

POLICY FOR THE PREVENTION, COMBATING AND MANAGEMENT OF VIOLENCE AND HARASSMENT AT WORK

COMIDOR S.A.

Legal name	COMIDOR ANONYMI ETAIREIA
Trade name	COMIDOR S.A.
Registered office / Address	11A Laskaratos Street, Pylaia Municipal Community, Thessaloniki
Tax Identification Number (TIN)	999256614
G.E.MI. No.	58722904000
Legal representative	Spyridon Skolarikis
Date of adoption	31/01/2026

A. Company Commitment and Legal Basis

COMIDOR S.A. (hereinafter the “Company”) considers integrity, mutual respect and the protection of human dignity to be integral elements of its working environment. The Company has zero tolerance for any form of violence or harassment at work, including gender-based violence and harassment and sexual harassment, irrespective of the person from whom such conduct originates.

This Policy takes into account the applicable legal framework, in particular Articles 59 to 69 of the Greek Labour Law Code (Presidential Decree 62/2025), Ministerial Decision 95/2026 (Government Gazette B’ 1/08.01.2026), as well as the relevant provisions on occupational health and safety and the protection of personal data.

The Company voluntarily adopts this comprehensive Policy irrespective of the number of persons it employs at any given time. If, in the future, the conditions for mandatory application of Article 62 of Presidential Decree 62/2025 are met, this Policy shall also apply for the purpose of complying with that obligation, subject to any update required by applicable law.

B. Purpose

The purpose of this Policy is to create and maintain a working environment that respects, promotes and safeguards human dignity and the right of every person to work free from violence, harassment, intimidation or humiliation. The Company seeks to prevent such conduct, ensure its early identification, provide safe reporting channels and address incidents promptly, impartially and effectively.

C. Scope

To the extent provided by applicable law, this Policy applies to every person connected with the Company or coming into professional contact with it, including in particular:

- employees under open-ended or fixed-term employment contracts, whether full-time or part-time;
- persons engaged under contracts for works, independent services or salaried mandate;

- leased or temporary personnel and persons providing services through third parties;
- apprentices, interns, trainees and volunteers;
- job applicants and persons whose employment or cooperation with the Company has ended, in relation to incidents connected with work;
- customers, visitors, suppliers, business partners and any third party interacting with Company personnel in a work-related context.

D. Definitions and Context of Application

Violence and harassment: forms of conduct, acts, practices or threats thereof that aim at, result in or are likely to result in physical, psychological, sexual or economic harm, whether occurring on a single occasion or repeatedly.

Harassment: conduct whose purpose or effect is to violate a person's dignity and create an intimidating, hostile, degrading, humiliating or offensive environment, irrespective of whether it constitutes a form of discrimination.

Gender-based harassment: conduct related to a person's sex or gender and having the above purpose or effect, including sexual harassment and conduct related to sexual orientation, gender expression, gender identity or sex characteristics.

Workplace: for the purposes of this Policy, the term is interpreted broadly and includes physical places where work is performed; rest, break and hygiene areas; travel to and from work where connected with work; business travel; training; corporate or social events related to work; remote work; and any work-related communication, including communication through email, company or personal devices and social media.

Domestic violence: acts of physical, sexual, psychological or economic violence in the context of family or intimate-partner relationships. Where its consequences affect an employee's work or safety, the Company shall, to the extent possible, take appropriate support and protection measures.

E. Indicative Forms of Prohibited Conduct

- actual or threatened physical violence, intimidation, stalking or other threatening conduct;
- verbal hostility, threats, or insulting, belittling or humiliating comments;
- sexual comments, jokes, gestures, unwanted touching, persistent or sexualised staring;
- intrusive questions about a person's private or sexual life, or persistent invitations after a refusal;
- sending or sharing messages, images or other material of a sexual or offensive nature in a work-related context;
- conduct related to a protected characteristic that creates a hostile or humiliating environment;
- acts of retaliation or adverse treatment because a person reported an incident or participated in a related procedure;
- extensions of domestic violence into the workplace or remote-working environment.

The following do not, in themselves, constitute violence or harassment when carried out lawfully, in good faith and without abusive or offensive conduct: reasonable supervision and management; setting objectives and duties; performance evaluation; substantiated criticism or feedback; performance-improvement measures; approval or reasoned refusal of leave; and lawful requests for documentation of absence.

F. Risk Assessment and Preventive Measures

The Company includes psychosocial risks and risks of violence and harassment in its occupational risk assessment and takes into account the nature of its activities, job positions, organisation of work, remote work, contact with customers or third parties and any groups of employees that may be more exposed to such risks.

In this context, the Company:

- fosters a working climate based on respect, cooperation and mutual support;
- provides information and appropriate training on recognising, preventing and addressing incidents;
- maintains clear, safe and easily accessible reporting channels;
- periodically assesses the effectiveness of its measures and updates them where required;
- cooperates, where required or considered necessary, with the Safety Technician, Occupational Physician and other competent professionals;
- ensures a safe and fair working environment;
- takes the necessary, appropriate and proportionate measures where a breach is established, with the aim of stopping the conduct and preventing a recurrence.

G. Employee Rights and Obligations

Every employee has the right:

- to be treated with respect and dignity;
- to be free from violent, harassing or intimidating conduct;
- to report an incident or concern without being subjected to retaliation or adverse treatment;
- to be informed of the available internal and external channels of protection.

Every employee is required:

- to comply with this Policy;
- to cooperate in good faith with an investigation when requested;
- to respect the confidentiality of the relevant procedures;
- to participate in relevant information and training activities organised by the Company.

Employees are encouraged to report incidents they experience or become aware of, particularly where there is a risk to the safety or health of any person.

H. Additional Duties of Managers and Supervisors

- ensure the implementation of this Policy within their area of responsibility;
- set an appropriate standard of conduct;
- refrain from engaging in prohibited conduct themselves;
- act without undue delay when they become aware of a serious incident;
- encourage timely reporting and inform the competent person or Company function.

I. Reference Person (“Contact Person”) and Person/Function Responsible for Complaints

The following person is designated as the reference person (“contact person”) for information and guidance on the prevention and handling of violence and harassment:

- Name: Maria Siapka
- Position: Administrative Assistant (Personnel)
- Contact details: smaria@comidor.com

The following person/function is designated as responsible for receiving, examining and managing complaints:

- Name / Function: Maria Siapka
- Position: Administrative Assistant (Personnel)
- Email / other contact details: smaria@comidor.com

The two roles may be performed by the same person where this is organisationally appropriate and impartiality, confidentiality and the absence of conflicts of interest are ensured. Where a conflict of interest exists or the complaint concerns the responsible person, the matter shall be assigned to another suitable person or function designated by Management.

J. Submission and Handling of Internal Complaints

Any affected person may submit a named oral or written complaint to the responsible person or function, in person or by email. Disclosure of the complainant's identity is required in order to activate the formal internal examination and investigation procedure. Written complaints shall be submitted using the "Incident Report and Complaint Form", which is made available separately by the Company. A person who wishes to raise a concern informally, without submitting a formal complaint and without activating the formal investigation procedure, may speak to the reference person without completing the "Incident Report and Complaint Form".

A named complaint should include, to the extent known, details of the person complained against, a description of the specific incident(s), the time and place of occurrence, any witnesses and any available supporting evidence. Anonymous information or reports do not constitute a formal complaint and do not activate the formal complaint examination and investigation procedure. However, where specific information concerning a possible incident of violence or harassment comes to the Company's attention, it shall be assessed within the framework of the Company's general prevention and response obligations and, where appropriate, suitable preventive or organisational measures may be taken.

The responsible person or function:

- receives and records the named complaint without obstructing its submission;
- investigates the allegations objectively, impartially and with respect for human dignity;
- may speak with the complainant, the person complained against and witnesses, and request relevant documents or other lawfully available evidence;
- adopts appropriate interim protective measures where required, without prejudging the outcome of the matter;
- maintains confidentiality and applies the principles of data minimisation and restricted access;
- completes the investigation without undue delay and, as a rule, within three (3) weeks, unless the complexity of the matter requires more time;
- submits a written report to Management setting out the conclusions and, where appropriate, recommended measures.

The complainant and the person complained against shall be informed that the procedure has been completed and, to the extent permitted by law and by the protection of personal data and third-party rights, of its outcome.

K. Measures Where a Breach Is Established

Where a violation of the prohibition of violence and harassment is established, the Company shall take the necessary, appropriate and proportionate measures on a case-by-case basis, with the aim of stopping the conduct and preventing a recurrence. Such measures may include, indicatively:

- a compliance recommendation or other written warning;
- a change of position, working hours, place or manner of work, where appropriate and lawful;
- organisational or protective measures designed to prevent recurrence;
- termination of the employment or cooperation relationship where justified by the seriousness of the breach and in accordance with applicable law.

L. Rights of the Affected Person

Any person subjected to an incident of violence or harassment retains, irrespective of the internal procedure, the right to judicial protection, to refer or submit a complaint to the Labour Inspectorate and to make a report to the Greek Ombudsman, as applicable.

Where, in the person's reasonable belief, there is an imminent serious risk to their life, health or safety, they may leave the workplace for a reasonable period without loss of pay or other adverse consequence, subject to the conditions of applicable law, after first informing the employer or the responsible person in writing.

M. Prohibition of Retaliation

Any adverse treatment, retaliation or victimisation against a person because they made a complaint or report in good faith, sought protection, exercised a lawful right or participated as a witness or other involved person in a related procedure is prohibited. This prohibition applies irrespective of the final outcome of the complaint, provided that the report was not made knowingly falsely with the intention of causing harm.

N. Personal Data Protection and Record Keeping

The records of each matter shall be kept in a dedicated confidential file, accessible only to persons for whom access is strictly necessary and only for as long as required for the purpose of the processing and under applicable law. The Company applies the GDPR, Greek Law 4624/2019 and the principles of lawfulness, data minimisation, accuracy, storage limitation, integrity and confidentiality.

O. Cooperation with Competent Authorities

The Company and any responsible person or function shall cooperate with the competent public, administrative or judicial authorities when requested within the scope of their powers and shall provide the necessary assistance and any information lawfully held by the Company.

P. Protection of Victims of Domestic Violence

To the extent possible, the Company shall take measures to protect employment and support employees who are victims of domestic violence, particularly where its consequences affect their work or safety. Depending on the circumstances, measures may include temporary adjustment of working hours or workplace, organisational safety arrangements and information on available support services.

Q. Entry into Force, Information and Publication

This Policy enters into force on the date of its adoption. The Company communicates it to its personnel and makes it easily accessible at the workplace and, where considered appropriate, on its internal or public website. Any material amendment shall be communicated in a corresponding manner. If the Company becomes subject to the mandatory application of Article 62 of Presidential Decree 62/2025, the consultation and publication requirements applicable at that time shall also be observed.

R. Contact Details of Competent Authorities

- Labour Inspectorate: 1555
- Hellenic Police: 100
- SOS Helpline for victims of gender-based / domestic violence: 15900, email: sos15900@isotita.gr
- Greek Ombudsman: www.synigoros.gr
- Useful websites: isotita.gr, womensos.gr

Thessaloniki, 31/01/2026

For COMIDOR S.A.

Legal Representative: Spyridon Skolarikis