

POLICY FOR THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT AT WORK AND FOR THE HANDLING AND MANAGEMENT OF INTERNAL COMPLAINTS REGARDING INCIDENTS OF VIOLENCE AND HARASSMENT OF THE COMPANY UNDER THE CORPORATE NAME:

FLAME CONTROL SINGLE-MEMBER PRIVATE CAPITAL COMPANY (IKE)

GEMI NO.: 123543101000

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1. Preamble

1.1. Integrity and respect towards all persons are of vital importance to Flamecontrol MON. I.K.E. (hereinafter the “Company”) and constitute an integral part of its corporate environment.

1.2. The Company has created a workplace in which the personality of all employees is valued and where equal opportunities for progress and development are provided. Respect for and the dignity of each employee individually are an immediate priority for the Company.

1.3. The Company’s corporate social policy is based on human rights, which define the minimum standards of work and serve as a complement to the Company’s values.

1.4. Demonstrating zero tolerance for incidents of violence and harassment in the workplace, the Company adopts this Policy in compliance with Articles 9 and 10 of Law 4808/2021, which ratified International Labour Convention No. 190/21.06.2021 of the International Labour Organization (ILO) concerning the elimination of violence and harassment in the world of work, the text of which was annexed in full.

2. Purpose

The purpose of this Policy is to maintain a high-standard working environment that respects, promotes and safeguards human dignity and every person’s right to a world of work free from violence and harassment. The Company declares that it recognizes and respects every employee’s right to a working environment free from violence and harassment and that it does not tolerate any such conduct, in any form, by any person.

3. Scope of Application – Persons Covered

This Policy covers the persons referred to in paragraph 1 of Article 3 of Law 4808/2021. Within its scope of application and protection fall all employees and persons engaged by the Company, regardless of their contractual status, including persons employed under an employment contract (open-ended or fixed-term, full-time or part-time), under a contract for services/contract

for work, independent services agreement, salaried mandate, persons engaged through third-party service providers, persons attending training, including interns and apprentices, volunteers, persons whose employment relationship has ended, job applicants, and other persons who transact or cooperate with the Company.

4. Prohibited Forms of Conduct – Definitions

4.1. Any form of violence and harassment is prohibited when manifested during work, connected to work, or arising from work, including gender-based violence and harassment and sexual harassment.

4.2. Violence and harassment.

“Violence and harassment” means 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 as a single incident or repeatedly.

4.3. Harassment.

“Harassment” means forms of conduct which have the purpose or effect of violating a person’s dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether they constitute a form of discrimination, and includes harassment on grounds of sex or on other grounds of discrimination.

4.4. Gender-based harassment.

“Gender-based harassment” means forms of conduct related to a person’s sex which have the purpose or effect of violating that person’s dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment, pursuant to Article 2 of Law 3896/2010 (A’ 107) and paragraph 2 of Article 2 of Law 4443/2016 (A’ 232). Such conduct includes the sexual harassment referred to in Law 3896/2010, as well as conduct related to a person’s sexual orientation, gender expression, gender identity or sex characteristics.

4.5. Discrimination.

“Discrimination” means the differential treatment of people arising from prejudice or interests; any act by which an unjustified distinction is made between persons based on the groups, classes or other categories to which they belong or are considered to belong. Indicatively: discrimination on grounds of sex, age, language, nationality, race or ethnicity, disability, religious beliefs or sexual orientation.

4.6. Incidents (indicative and non-exhaustive).

Conduct prohibited under this Policy includes, indicatively and without limitation: discrimination-based insults on grounds of sex, race, religion, appearance, sexual orientation, disability, age or other personal characteristics and choices; threats (verbal or by gestures); insults publicly or in private; belittling or ridiculing a person or their abilities, privately or in the

presence of third parties; threatened or actual physical violence; persistent or unjustified criticism.

It also includes abusive, malicious, derogatory, obscene or mocking comments and their dissemination; insinuations; sexist or racist “jokes” and comments; use of offensive language; verbal sexual harassment or propositions; insinuations that sexual favors may advance someone’s career or that refusal to engage in a sexual relationship may negatively affect their professional course in the Company; offering benefits (e.g., promotion or pay raise) in exchange for sexual favors; or creating an environment that promotes “sexual contact” as a means of professional advancement in the workplace; retaliation or threats of retaliation following rejection of sexual propositions.

Cyberbullying; sending messages with harassing or offensive content via SMS, email, social media, fax or letter; persistent and/or offensive questions without lawful reason or cause regarding age, marital/family status, personal life, sexual orientation, and similar questions regarding race or ethnicity, including cultural identity and religion.

Visual forms of harassment are also included, e.g., posters, animations, cartoons, photographs or drawings that are derogatory based on characteristics protected by law.

Unwanted physical contact such as touching, pinching, sexually suggestive gestures, hitting, grabbing, pushing, as well as any form of physical violence.

Violation of privacy; intentional partial or total destruction of personal items, vehicles or property; interference with or obstruction of normal work, movement and physical integrity; physical exclusion or confinement; sexual gestures; physical surveillance, stalking, pursuit.

The above acts are indicative and do not constitute an exhaustive list of prohibited acts.

4.7. Legitimate conduct.

The following do not constitute incidents of violence and harassment: direct supervision of employees, including setting performance expectations; taking measures to correct performance, such as placing an employee on a performance improvement plan; assigning tasks and providing guidance on how and when they must be performed; requesting work updates or progress reports; approving or justifiably refusing leave; requesting documentation of absence for health reasons in accordance with applicable legal provisions; moral and/or financial reward for excellent employee performance; providing constructive feedback on work performance.

5. Scope – Definition of the Workplace

5.1. “Workplace” means a broader spatial framework within which incidents of violence and harassment may occur. The above conduct may take place in all Company premises nationwide where employees provide their services, as well as in areas where employees receive their

remuneration, take breaks for rest or meals, in areas of personal hygiene and care, changing rooms or accommodations provided by the Company to staff.

This Policy also covers any type of commuting to and from work, other travel, business trips, conferences, training, as well as social events and activities related to work or connected to the Company's activities.

Finally, it applies to any communications related to the Company, including those conducted via information and communication technologies (e.g., emails, Zoom or Teams meetings, social media, etc.).

5.2. Domestic violence includes all acts of physical, sexual, psychological or economic violence occurring within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners, regardless of whether the perpetrator shares or previously shared the same residence with the victim.

Domestic violence that takes place in the workplace, for example through physical violence, sexual harassment and stalking by current or former partners, constitutes a serious form of workplace violence. Acts of domestic violence, including stalking/surveillance, may also be committed by persons within the same work environment with whom they have (or had in the past) close relationships. Domestic violence, in any of the above forms, exercised against an employee during telework is also covered.

6. Employer Obligations for Preventing and Addressing Violence and Harassment

The Company, as well as persons exercising managerial authority or representing the employer, has adopted a Complaint Submission and Investigation Procedure, through which it:

- (a) receives, investigates and manages any complaint or relevant report, demonstrating zero tolerance for violence and harassment, with confidentiality and in a manner that respects human dignity, and does not obstruct the receipt, investigation and handling of such complaints or reports,
- (b) provides assistance and access to any competent public, administrative or judicial authority during the investigation of such an incident or conduct, where requested,
- (c) provides employees with information on potential risks of violence and harassment in the workplace and relevant prevention and protection measures, including the obligations and rights of employees and the employer in relation to such incidents, and
- (d) posts in the workplace and makes accessible information on the procedures in place at company level for reporting and addressing such conduct, as well as contact details for the competent administrative and judicial authorities pursuant to applicable provisions.

7. Assessment of Risks of Violence and Harassment at Work

7.1. Risk factor assessment and improvement.

The Company conducts studies in cooperation with all departments and the competent occupational physician regarding potential risk factors depending on the nature and subject matter of the work provided, psychosocial risks, including risks of violence and harassment at work, with the aim of assessing existing working conditions and readjusting them so as to reduce, as far as possible, the likelihood that an incident of violence and harassment will occur in the workplace.

Indicative risk cases include: high workplace stress; isolated or enclosed work areas; allocation/layout of workstations; facility security and controls; lack of adequate training; persons with a history of violent behavior; delivery of goods or services; lone work or work in isolated areas; late-night or early-morning work; household or personal-life issues spilling over into the workplace.

7.2. Seminars, informational materials and regular staff training on violence and harassment.

All employees must understand which behaviors constitute violence and harassment and are non-tolerable and reprehensible. The designated reference person for violence and harassment matters shall ensure that staff receive appropriate awareness-raising on violence and harassment and shall make this Policy known within and outside the Company.

8. Measures for Preventing Incidents of Violence and Harassment.

8.1. Information on the rights of affected persons.

The Company states that where a person is affected by an incident of violence and harassment when accessing employment, during the employment relationship, or even if the contract or employment relationship under which the incident or conduct is alleged to have occurred has ended, that person has:

- (a) the right to judicial protection,
- (b) the right to lodge a complaint and request labor dispute resolution before the Labour Inspectorate, within its lawful competences,
- (c) the right to report to the Greek Ombudsman, within its lawful competences, and
- (d) the right to file an internal complaint in accordance with the Company's complaint management policy.

The individual submission, management and internal investigation procedures set out the detailed steps to be taken by any complainant, as well as the responsibilities of the Company's bodies and the actions required to ensure effective handling of relevant incidents. In any case, where a report or complaint of such conduct arises within the Company, the affected person retains all rights to address any competent authority.

Any employee who is subject to domestic violence which has repercussions in the workplace may report this orally or in writing to their supervisor so that the Company is informed and can take appropriate and necessary measures.

8.2. Information, awareness and staff support actions.

By this Policy the Company informs staff and maintains in a visible place the details of the competent administrative authorities to which any affected person may have recourse (Labour Inspectorate, Greek Ombudsman). In particular, it provides information on the complaint hotline of the Labour Inspectorate (S.E.P.E.) 15512, as well as through the citizen service line 1555 and the portal <https://1555.gov.gr/>

, and also on the immediate psychological support and counseling service for women victims of gender-based violence, who may contact the SOS Helpline 15900 (General Secretariat for Demographic and Family Policy and Gender Equality – G.G.I.F.).

Within its capabilities, the Company takes any appropriate measure and makes any reasonable adjustment of working conditions to protect employment and support employees who are victims of domestic violence.

The Company also takes all necessary measures to inform and raise awareness among staff, using the appropriate means mentioned above, ensuring that everyone is aware of the Company's policy and procedures regarding incidents of violence and harassment, knows where to turn in case of violence or harassment, and understands the options afforded by law.

The Company trains its executives, by any appropriate means, to recognize discrimination, violence and harassment at work and to provide the required support to staff and partners. It also encourages participation of employee representatives and management members in training programs and educational seminars on identifying and managing potential risks of violence and harassment and may organize seminars with mental health professionals or counseling service providers.

9. Procedure for Submitting and Managing Internal Complaints – Reference Person

9.1. Any employee against whom any incident of violence and harassment has been manifested may submit an oral or written complaint to the Company's Legal Representative, who is also designated as the "reference person" for this Policy. The complaint may be submitted in person or via email at m.rerakis@flamecontrol.gr

. Anonymous complaints are not permitted.

9.2. The complaint must state the details of the respondent/accused, i.e., the person who engaged in the prohibited conduct, as well as the specific incident(s) constituting such conduct.

9.3. The reference person thoroughly investigates each complaint and collects any evidence necessary. Complaints and investigations remain strictly confidential to the maximum extent

possible, taking into account the sensitivity of the case and the confidentiality of all parties involved.

9.4. In particular, the reference person may speak with the complainant and the respondent, interview witnesses, request the submission of any documents that may exist and that prove whether or not any incident of violence and harassment occurred, and communicate with the heads of each department, where the complainant approached them.

9.5. Upon completion of the investigation, the reference person notifies the outcome to the complainant and the respondent so that they are informed. Completion of the investigation and submission and communication of the reference person's findings must take place as soon as possible and, in any event, no later than three (3) weeks from the date the complaint was filed by the complainant.

9.6. If a substantiated incident of discriminatory treatment, violence or harassment or retaliation is found, the Company's Management takes, as appropriate, all necessary, suitable and proportionate measures against the respondent. Such measures may include indicatively: (a) a recommendation to comply, (b) change of job position, working hours, place and manner of performance of work, (c) termination of the employment contract or cooperation agreement with the Company, subject to the prohibition of abuse of rights under Article 281 of the Greek Civil Code. In any case, the offender may also incur criminal or civil liability pursuant to applicable legislation.

9.7. Complaints that are proven to be manifestly malicious shall be deemed inadmissible and may be further examined at the Company's discretion, both as to motives and as to those involved, in order to restore order by any lawful means and measures.

10. Rights of Affected Persons

10.1. Under applicable legislation, any person subjected to violence and harassment has the right to leave the workplace for a reasonable period without loss of pay or other adverse consequence, provided that, in their reasonable belief, there is an imminent serious risk to their life, health or safety, particularly where the employer is the perpetrator of such conduct or where the employer fails to take the necessary appropriate measures to restore workplace peace, or where such measures are not sufficient to stop the violent or harassing behavior.

In such case, the departing person must first inform the reference person in writing, describing the incident of violence and harassment and the facts supporting their belief that a serious risk is imminent. If the risk does not exist or has ceased to exist and the affected person refuses to return to the workplace, the employer may refer the matter to the Labour Inspectorate requesting resolution of the dispute.

10.2. Employees facing incidents of violence and harassment at work have the right to apply to the competent authorities as provided by law (a) right to judicial protection, (b) right to lodge a complaint and request labour dispute resolution before the Labour Inspectorate within its lawful competences, (c) right to report to the Greek Ombudsman within its lawful competences.

11. Duty of Impartiality and Confidentiality

The reference person is obliged to act during the investigation process in an objective and impartial manner. In addition, they must treat all involved parties with respect and act confidentially and discreetly. Disclosure or communication to non-involved parties of information relating to the complaint under examination is strictly prohibited. The applicable legislation on privacy and personal data protection is strictly observed. These obligations also bind the Company's Management at the final stage of taking measures and decisions.

12. Απαγόρευση Αντιποίνων – Θυματοποίησης του καταγγέλλοντα.

Retaliation and victimization of the complainant are prohibited, where the complainant, as an affected person, asserted their rights and filed a written complaint regarding an incident of violence and harassment. Retaliation and victimization constitute a serious breach of this Policy and entail consequences for the person engaging in such conduct.

If any employee or third party connected in any way with the Company considers that they have been subjected to retaliatory conduct due to filing a complaint or assisting in the investigation of incidents of discrimination, violence and/or harassment, they must follow the above procedure to report the incident of retaliation.

13. Συνεργασία με διοικητικές και δικαστικές αρχές.

The Company, as well as any competent person or service responsible for receiving and managing such complaints at company level, cooperates with any competent public, administrative or judicial authority which, either ex officio or following a request by an affected person within its competence, requests provision of evidence or information, and undertakes to provide assistance and access to the relevant data.

For this purpose, any evidence collected in any form is kept in a relevant file, in compliance with the provisions of Law 4624/2019 (A' 137) "Hellenic Data Protection Authority; measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data".

14. Derogations

Derogations from the application of this Policy are not permitted.

15. Contact Person.

For further information regarding this Policy, any interested person may contact the Company's Legal Representative, Mr. Matthaios Rerakis.

16. Policy Review

Annual review or following legislative changes/incidents.

Management Statement: Flame Control MON. I.K.E. is fully committed to the implementation of this Policy.

Signature:



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