POLICY ON PREVENTING AND COMBATING VIOLENCE AND HARASSMENT IN THE WORKPLACE

Introduction

VAKON CONSTRUCTIONS S.A. is primarily committed to protecting its employees and creating safe working conditions, condemning all forms of violence and harassment, regardless of who perpetrates them or who they are directed against.

The Company implements all measures and obligations arising from Part II of Greek Law 4808/2021 and has zero tolerance for any conduct, acts, practices or threats intended to or resulting in physical, psychological, sexual or economic harm, whether occurring as isolated incidents or repeatedly. This includes any form of violence, discrimination, intimidation or harassment, of any nature or kind, that may arise in the Company's workplace.

This Policy, adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the relevant implementing regulatory legislation, and relating to Article 3(1) of the same Law, describes the procedures and rules governing relationships between the Company's employees. Its purpose is to prevent incidents of harassment and to create and maintain a working environment that respects, promotes and safeguards human dignity and everyone's right to a workplace free from violence and harassment.

For the purposes of this Policy, the term "workplace" refers to any place where a specific activity or work is carried out for which the employee receives [the original Greek text is incomplete at this point].

"Violence and harassment" refers to forms of conduct, acts, practices or threats thereof that are intended to, result in or may result in physical, psychological, sexual or economic harm, whether occurring as isolated incidents or repeatedly.

"Harassment" in the workplace refers to any form of conduct that has the purpose or effect of violating an employee's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether such conduct constitutes a form of discrimination. It also includes harassment based on gender or other discriminatory grounds.

Scope of Application of this Policy

This Policy applies to all employees of VAKON CONSTRUCTIONS S.A., regardless of their place of work, as well as to the Company's external associates and visitors.

Key Applicable Rules

Harassment of any person working at or visiting the premises of VAKON CONSTRUCTIONS S.A. on the grounds of gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or gender expression is strictly prohibited.

The following conduct is expressly prohibited in the workplace of VAKON CONSTRUCTIONS S.A., or at any location where the Company's executives and employees are present for business purposes:

- Any form of sexual proposition, whether explicit or implied.
- Sexual innuendos, sexual jokes or teasing.
- Comments, offensive descriptions or defamatory expressions containing sexual insinuations.
- Obscene gestures and obscene language.
- The display, distribution or circulation of videos or images of a sexual or sexually suggestive nature.
- Any form of physical contact.

Any comments or degrading behaviour containing racist, ethnic, religious or sexist content are also expressly and strictly prohibited.

Person Responsible for Managing Incidents of Violence and Harassment

The person responsible at VAKON CONSTRUCTIONS S.A. for receiving, reviewing and managing complaints or reports submitted by individuals affected by incidents of violence and harassment is Mr. Vasileios Theodosiou.

Employees may contact him in person by visiting his office, by telephone or via email.

Mr. Vasileios Theodosiou shall inform the affected individual of the available options and the procedures to be followed.

Procedure for Managing Incidents of Violence and Harassment

1. Reporting an Incident

Any employee who has experienced an incident of violence or harassment must notify the Company's designated person responsible for managing such incidents.

2. Investigation and Confidentiality

The designated person shall act promptly and impartially and shall investigate and examine complaints objectively, ensuring the confidentiality and protection of the personal data of both the affected individuals and the persons against whom the complaints have been made.

The Company and the person responsible for managing such incidents must perform their duties with discretion and impartiality, maintaining confidentiality and protecting the Personal Data (PD) collected.

The Company shall take all possible measures to ensure the protection of the affected individual and shall maintain zero tolerance towards any form of retaliation against them.

3. Assessment of the Incident and Protective Measures

The Company, in cooperation with the designated person and the affected individual, shall review all available information and assess the seriousness of the incident.

For the duration of the investigation, the affected individual may be transferred to a different position or have their working hours adjusted in order to ensure their safety.

4. Corrective and Disciplinary Measures

If the investigation establishes that the incident did indeed occur, the Company shall take all lawful measures against the offender, depending on the seriousness of the incident.

Such measures may include corrective or disciplinary action, as well as other measures such as formal warnings regarding compliance, reassignment to another position or even termination of the employment contract.

The person responsible for managing complaints may cooperate with any competent authority that requests the provision of information and evidence, either on its own initiative or following a relevant request. The Company undertakes to provide the necessary assistance and access to such information and evidence.