

## **1. THE POLICY**

This policy is adopted in accordance with articles 9 and 10 of the Greek Law 4808/2021 and the regulatory legislation applied thereof. The parent company "MOTODYNAMICS S.A.", as well as each of its subsidiaries, namely "MOTODIKTYO SINGLE MEMBER S.A." and "LION RENTAL SINGLE MEMBER S.A." comply to all measures and obligations relating to the implementation of the provisions of Part II of the Greek Law 4808/2021 with respect to the prevention and tackling any form of violence and harassment, including gender-based violence and harassment and sexual harassment.

## **2. PURPOSE**

The purpose of this policy is to create and establish a working environment that respects, promotes, and ensures human dignity and the right of each individual to a world of work free from violence and harassment. The parent company "MOTODYNAMICS S.A.", as well as each of its subsidiaries "MOTODIKTYO SINGLE MEMBER S.A." and "LION RENTAL SINGLE MEMBER S.A." (hereinafter each referred to as "Company") declare that they recognize and respect the right of each employee to a working environment without violence and harassment and that they do not tolerate any such behavior, of any form by any person.

## **3. SCOPE OF APPLICATION**

**3.1** This Policy's scope of application encompasses all employees of the Company and those employed by it, regardless of their contractual status, including those employed under project contracts, contracts of independent services, of paid mandates, those employed through third-party service providers, as well as persons undergoing training, including interns and apprentices, volunteers, employees whose employment relationship has ended as well as job applicants.

**3.2** This Policy applies to cases in which the behavior of violence and harassment is manifested, including but not limited to:

- (a) in the workplace, including areas where the employee takes breaks
- (b) during commutes from and to work, other transits, travels, training, as well as events and social activities relating to work, and
- (c) during work-related communications, including those conducted via information and communication technologies.

## **4. DEFINITIONS - INDICATIVE CASES**

**4.1** "Violence and harassment" refer to behaviors, actions, practices, or threats thereof, that aim, result, or may result in physical, psychological, sexual or financial harm, whether they are manifested isolated or repeatedly.

**4.2** "Harassment" refers to behaviors that aim or result in the violation of a person's dignity and the creation of an intimidating, hostile, degrading or aggressive environment, regardless of whether they constitute a form of discrimination. The definition of "harassment" includes the following, indicatively referred, behaviors:

- Aggressive behavior, both verbal and physical.
- Psychological violence.
- Bullying.
- Depreciation of a colleague's work.
- Social isolation.
- Racist or demeaning comments based on ethnicity.
- The capture, posting, display, publication, photography, printing, distribution of pornographic, indecent, insulting or inappropriate material or material of a sexual, ethnic, religious or racist nature.
- The use of insulting humor, including racist, religious, sexist jokes or jokes based on ethnicity.
- Demeaning comments regarding gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, identity or gender expression, or any other legally protected characteristic of another individual.
- Any communication or action that is harassing or discriminatory.

**4.3** "Sexual harassment" refers to behaviors associated with a person's gender, which aim or result in violating the dignity of that person and in creating an intimidating, hostile, degrading or aggressive environment\*.

*\*Article 2 of the Greek Law 3896/2010 (A' 107) and para. 2 of Article 2 of the Greek Law 4443/2016 (A'232).*

**4.4** With respect to the behaviors that relate to a person's gender, sexual harassment\*\* as well as behaviors related to sexual orientation, expression, identity or the gender characteristics of a person are included. Sexual harassment may come from both a man and woman, or even from a person of the same gender as of the person being harassed. Examples of sexual harassment include the following indicative behaviors:

- Coercion into sexual acts or contact.
- Unwanted/inappropriate touching.
- Obscene gestures/expressions.
- Verbally explicit sexual proposals.
- Unwanted invitations to a date.
- Display of pornographic drawings, photos or videos.
- Sending emails or sms with subject or material of sexual nature.

- Sexual insinuations.
- "Teasing" or jokes of sexual content.
- Unwanted comments or adjectives with sexual innuendos.
- Vulgar language.
- Suspicious recurring phone or digital harassments under the guise of work.

## **PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT AT WORK**

### **5. RISK ASSESSMENT OF VIOLENCE AND HARASSMENT AT WORK**

**5.1** Harassment may have significant effects on employees. Specifically, it may affect their physical, mental and psychosomatic health and may result in serious consequences, anxiety, exhaustion, as well as a decrease in performance, while these symptoms may persist for several years.

**5.2** At company level, harassment may lead to higher rates of absence from work and decrease in productivity.

### **6. MEASURES FOR THE PREVENTION, CONTROL, LIMITATION AND TACKLING THESE RISKS AS WELL AS MONITORING OF SUCH INCIDENTS OR BEHAVIORS-**

Indicatively, the measures that the Company takes for the prevention, control, limitation and tackling incidents of violence and harassment or violent and harassing behavior are the following:

- Encouragement to maintain a working environment in which respect for human dignity, cooperation and mutual assistance are core values.
- Open communication with the Company and the immediate supervisors and colleagues.
- Procedure for managing reports/complaints.
- Encouragement for the submission of reports or complaints for incidents of violence and harassment.
- Ensuring that employees have the necessary training/information to perform their duties, especially in job positions with a higher risk of manifestation of incidents of violence and harassment.
- Technical measures, such as improved lighting etc.
- Actions to raise employees' awareness about healthy behavior standards (e.g. avoidance of addictions), as well as about issues relating to vulnerable employee categories.

- Guidance and support to victims of violence and harassment or victims of domestic violence for the purpose of their reintegration in the workplace.
- Training employees on the procedures for managing incidents of violence.
- Regular assessment of the effectiveness of the implemented preventive and response measures as well as revision/updating of the risk assessment and of the measures.

## **7. ACTIONS FOR INFORMING AND RAISING AWARENESS OF THE STAFF**

Within the framework of raising staff's awareness, the Company, assessing the given circumstances, may:

- Organize targeted staff meetings to discuss relevant issues and address potential risks in a timely manner.
- Conduct seminars with mental health specialists or counseling service providers, representatives of volunteer organizations, etc.
- Encourage the participation of staff representatives and management members in training programs and educational seminars relating to the recognition and management of risks of violence and harassment at work.
- Inform staff about behaviors that constitute harassment.

## **8. INFORMATION ON THE RIGHTS AND OBLIGATIONS OF EMPLOYEES AND THE EMPLOYER, AS WELL AS OF PERSONS WHO EXERCISE MANAGERIAL RIGHTS OR REPRESENT THE EMPLOYER, TO THE EXTENT AND DEGREE OF THEIR RESPONSIBILITY, IN CASE OF MANIFESTATION OR REPORT OR COMPLAINT OF SUCH INCIDENTS, AND ON THE RELEVANT PROCEDURE.**

**8.1** In case an employee is affected by an incident of violence and harassment they have the right, in accordance with Article 12 of the Greek Law 4808/2021 to:

- a) judicial protection,
- b) appeal, submit a complaint and apply for a labor dispute to the Labour Inspectorate, within the framework of its legal powers,
- c) report to the Greek Ombudsman, within the framework of its legal powers, and
- d) file a complaint to the Company, in accordance with the Company's complaint management policy.

**8.2** Each employee suffering an incident of violence and harassment against them, has the right to leave the workplace for a reasonable period of time, without salary

deprivation or any other adverse consequence, in case upon their reasonable belief an imminent serious threat to their life, health, or safety exists, especially in case no necessary and appropriate measures are taken to restore the workplace peace, or when these measures are insufficient to stop the violent and harassing behavior. In this case, the departing employee is obliged to inform the Company in writing beforehand, mentioning the incident of violence and harassment and the circumstances that justify their belief that there is an imminent serious risk to their life, health or safety. If the risk does not exist or has ceased to exist, and the person who suffered the incident of violence and harassment refuses to return to the workplace, the Company has the right to appeal to the Labour Inspection requesting the resolution of the dispute.

**8.3** The Company, as well as the persons exercising management rights, or represent the Company, are obliged to:

- a) receive, investigate and handle every complaint or related report, demonstrating zero tolerance towards violence and harassment, acting with confidentiality and in respectful to the human dignity manner, ensuring that the receipt, investigation and management of these complaints or reports are not hindered,
- b) provide assistance and access to any competent public, administrative or judicial authority, when investigating such incidents or behaviors, upon request of these authorities,
- c) provide information to employees regarding potential risks of violence and harassment in the workplace and the relevant preventive and protective measures, including the obligations and rights of both employees and the employer with respect to such incidents,
- d) display in the workplace and make accessible the information on the existing at company level procedures for reporting and addressing such behaviors, as well as the contact details of the competent, pursuant to the applicable provisions, administrative and judicial authorities.

**8.4** Any Head or Director whose attention is drawn to a potential manifestation of violence or harassment is obliged to immediately inform any member of the Human Resources Management, which supports this specific procedure.

**8.5** The Directors and Heads of Directorates or/and Departments within the Company are obliged to (i) inform their subordinates about this Policy and the related procedures, and (ii) encourage their subordinates to adopt a positive, open-minded work attitude, in order to feel that they can easily express their concerns.

## **9. APPOINTMENT OF PERSON OF REFERENCE («LIAISON»)**

The Director of Human Resources Mrs. Sofia Thomaidou is appointed as the person of reference ("liaison "), responsible for guiding and informing employees about the prevention and tackling violence and harassment in the Company, regardless of whether they approach it due to an incident or a complaint about an incident of violence.

## **10. EMPLOYMENT PROTECTION AND SUPPORT OF EMPLOYEES VICTIMS OF DOMESTIC VIOLENCE**

In the case of an employee who is a victim of domestic violence and aiming to support them in maintaining their job and their smooth reintegration after incidents of violence, especially in cases in which there are minor children or children with disabilities or serious illnesses, upon request of the employee victim of domestic violence and after evaluating the circumstances by the Company, it is possible to indicatively provide them with special leave, to arrange the provision of their work in a flexible way, and generally take every necessary measure for the protection of their employment.

## **11. WAYS OF COMMUNICATION IN CASE OF AN INCIDENT OF VIOLENCE AND HARASSMENT - RESPONSIBLE PERSON FOR RECEIVING AND INVESTIGATING THE COMPLAINTS AND FOR INFORMING THE COMPLAINANTS**

**11.1** The Director of Human Resources Ms. Sophia Thomaidou, who has also been appointed as the person of reference ("liaison"), is appointed as the person responsible for the reception, investigation and management of complaints or grievances of affected individuals by violent or harassing behaviors, whose the contact details are the following:

**E-mail :** [s.thomaidou@motodynamics.gr](mailto:s.thomaidou@motodynamics.gr)

**Phone numbers:** 210 6293516 – 693 2900555

**Address of the Company's Office:** 10 Germanikis Sholis Str., 15123 Marousi, Attica

**11.2** Any employee wishing to report or denounce an incident of violence or harassment should immediately contact, according to the aforementioned methods, the Director of Human Resources, Ms. Sofia Thomaidou. In case this becomes difficult for any reason, the employee may address, in order of priority, the following persons: their immediate superior, any director of the company, any member of the Human Resources Management and any member of the company's compliance body. The aforementioned persons are obliged to immediately report the incident to the Director of Human Resources, Ms. Sofia Thomaidou. Even though employees are advised to seek assistance from the aforementioned individuals in the specified order of priority above, they may, in case of danger or an emergency situation, report their concerns to any reporting channel at any time.

**11.3** The Company encourages name-based reports/complaints. Anonymous reports/complaints make the investigation of the reported/alleged incidents difficult due to the challenge of assessing the credibility of the report/complaint. However, anonymous reports/complaints are evaluated, in any case, taking into account the severity of the matter and the possibility of their confirmation from independent and reliable sources.

**11.4** The Company will immediately inform the complainant about the receipt of their report/complaint, providing them with the relevant affirmation of receipt (either paper or electronic form). The Human Resources Department or another appointed person with the task of investigating such complaints will promptly and thoroughly examine the reports/complaints. Subsequently, the complainant will be informed about the results of the relevant investigation.

## **12. INVESTIGATION AND EXAMINATION OF COMPLAINTS WITH IMPARTIALITY AND PROTECTION OF THE CONFIDENTIALITY AND PERSONAL DATA OF THE VICTIMS AND OF THE ACCUSED PARTIES**

**12.1** By ensuring a trustworthy and secure environment for employees, the Company encourages the submission of reports/complaints about incidents of violence and harassment. The procedure for receiving and examining such complaints is conducted in a way that ensures the protection of the victim and the respect for human dignity.

**12.2** A fundamental and inviolable principle of the Policy is the protection of confidentiality and the personal data of the victims and of the accused parties as well as the assurance that their current position or future professional development are not jeopardized.

**12.3** The reports/complaints are treated with impartiality and respect to the general and specific principles and values, especially those of respect for personality, trust, and transparency. In this context, the Company (i) investigates the reports/complaints and responds to them with diligence, care and without discrimination, (ii) makes every effort and exhausts every possibility for the immediate resolution of the report/complaint and (iii) does not litigate against the person submitting the report/complaint.

**12.4** The Company is committed to protecting its employees who have submitted a report/complaint in good faith from (i) any actions of retaliation with respect to their current position and their future professional development, (ii) any other form of discrimination or any kind of unfavorable treatment, (iii) actions or behaviors of targeting and further victimization.

**12.5** The accused parties have the right to be informed about the incident of violence or harassment with which they are charged, as well as about the individuals

who have access to the data contained in the report/complaint, in the context of its examination. However, in cases where there is a serious risk that the aforementioned notification may hinder the investigation of the case and the collection of the necessary evidence, the notification to the individuals that the report/complaint concerns, may be postponed until this risk no longer exists.

**12.6** In case that the report/complaint is related to a person involved in the investigation process or in case any of these persons have a conflict of interest, then that person will abstain from the investigation of the report/complaint and will be replaced.

### **13. PROHIBITION OF RETALIATION AGAINST THE AFFECTED PERSON**

The Company commits to comply with the obligation to prohibit retaliation and further victimization of the affected individual, in accordance with Article 13 of Law 4808/2021 and the provisions of labor legislation.

### **14. DESCRIPTION OF THE CONSEQUENCES UPON DETECTION OF VIOLATIONS**

**14.1** After the examination of the information collected during the investigation and the reaching of specific conclusions, the Company will take the appropriate actions and will announce its decision to both the complainant and the alleged offender, as appropriate.

**14.2** When an employee or an individual under a different employment relationship violates the prohibition of violence and harassment, the Company is obliged to take the necessary appropriate and proportional measures against the accused person in order to prevent and ensure that such an incident or behavior does not recur. These measures may include the issuance of a compliance notice, change of the position, schedule, place or way of work provision, or termination of the employment or cooperation relationship, with the reservation of the prohibition of the abuse of rights under Article 281 of the Greek Civil Code.

### **15. COOPERATION WITH THE AUTHORITIES AND PROVISION OF INFORMATION**

The company as well as the person responsible for receiving and managing complaints will cooperate with any competent public, administrative or judicial authority which, either on its own initiative or following a request from an affected person, within its jurisdiction, requests the provision of details or information and commit to providing assistance and access to the data (paragraph 1 of Article 5 of the Greek Law 4808/2021). For this purpose, any data they collect, in any form, is kept in a relevant file, in accordance to the provisions of the Greek Law 4624/2019 (A' 137).

### **16. PROCESSING OF PERSONAL DATA**



**16.1** Every processing of personal data within the context of this Policy complies with the provisions of the national and European legislation.

**16.2** The personal data relating to the parties involved in a report/complaint are processed solely for the purposes of verifying the validity of the report/complaint. In other respects, the provisions of the Company's Privacy Policy apply (<https://motodynamics.gr/>).

## **17. FINAL PROVISIONS - APPROVAL & REVIEW OF THE POLICY**

**17.1** The Policy is notified to the employees through posting on the company's internal information network (WeNet).

**17.2** The Policy is reviewed on a regular basis and is revised when necessary.

## **18. VALIDITY**

The present has immediate effect.