

POLICY AGAINST VIOLENCE & HARASSMENT

07/2022

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1. PREAMBLE

The anonymous company "DOMOCHEMICAL INDUSTRIAL COMMERCIAL SOCIETE ANONYME," with the distinctive title "NOVAMIX," based in Chalandri, Attica (40 Papanikoli Street), complies with all measures and obligations related to the implementation of Part II of Law 4808/2021 for the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

2. PURPOSE

The objective of this policy is to create and consolidate a working environment that respects, promotes, and ensures human dignity and everyone's right to a work environment free of violence and harassment. The Company declares that it recognizes, respects, and protects every employee's right to work in an environment free of violence and harassment, and that it has zero tolerance for any phenomenon of violence, discrimination, intimidation, or harassment, of any nature or form, that manifests itself during work or arises from it.

3. SCOPE

This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and their implementing legislation, and it applies to all persons described in paragraph 1 of Article 3 of Law 4808/2021, i.e. employees and private sector employees, regardless of contractual status. In particular, the Company informs employees about any potential or actual risk of workplace violence and harassment, as well as the measures in place to prevent it and the procedures in place to deal with it.

A. Preventing and combating violence and harassment at work.

(a) The Company assesses the risks of violence and harassment, taking into account a number of factors as well as employee characteristics that can be a reason for discrimination and intimidation, such as, but not limited to, the employees' gender, age, position and hierarchy within the company.

Simultaneously, the risk of violence and harassment faced by various subgroups, such as newly hired workers, night shift workers, vulnerable worker categories, and so on, is assessed.

(b) The Company is committed to taking all reasonable and appropriate precautions to avoid, control, limit, and address the aforementioned risks, as well as to monitoring such incidents or forms of behaviour, demonstrating zero tolerance for violence and harassment. Any action taken by the Company to achieve the above goal is taken and carried out in a manner that respects human dignity, with complete discretion and confidentiality.

In particular, the Company

(i) seeks to foster a positive working environment among employees by encouraging feelings of mutual respect for one another,

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- (ii) encourages a meritocratic system of employee internal development,
- (iii) organizes actions to educate and raise employee awareness about how to deal with incidents of violence and harassment,
- (iv) takes precautions to prevent risks and maintain its facilities, while the Company's executives must inspect the working conditions of each department (cleanliness, safety, etc.), which must be suitable for the performance of the employees' duties,
- (v) any complaint about incidents of violence and harassment is investigated immediately, and the effectiveness of the prevention and response measures is evaluated on a regular basis.

(c) The Company proceeds with staff information and awareness actions, such as sending this policy and/or any other information leaflet to them via e-mail and posting these forms on the Company's website or in easily accessible locations within the Company's premises (e.g. on the bulletin board). The Company may hold additional meetings to discuss these phenomena, as well as other actions and educational programs

(d) In the event of the occurrence, reporting, or termination of such incidents, the Company provides information on the rights and obligations of the employees and the employer, as well as the persons exercising managerial rights or representing the employer, to the extent and scope of their own responsibility, as well as the relevant procedure.

The Company commits to fully informing its employees not only about their rights in the event that they are the victims of any harassment behavior or incident, but also about all legal actions they may take from now on. In general, each affected employee has the following options, namely

- (i) recourse to judicial protection,
- (ii) submission of a complaint to the Labor Inspectorate in accordance with its statutory mandate,
- (iii) the filing of a petition with the Greek Ombudsman in accordance with his legal responsibilities as well as
- (iv) a complaint within the Company, in accordance with the complaint management policy. The Company informs its employees about how they communicate with the appropriate authorities and how to file an appeal with them.

(e) The Company appoints Lefteris Gkogkos as a reference person ("Link") for the guidance and information of employees regarding the prevention and treatment of violence and harassment at work, to whom employees can appeal for any relevant issue, and in particular at the telephone number +30 210 6853 098 and the e-mail address l.gogos@novamix.gr. The employee may contact the reference person at any time for information and guidance on any issue related to incidents of violence and

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harassment, while committing to protect the personal data of the employees who come to his knowledge in the performance of his duties.

(f) The Company takes care of the protection of employees and the support of employees of victims of domestic violence, to the greatest extent possible, by any appropriate means or reasonable adjustment, maintaining the job of employees who have suffered similar incidents, promoting their smooth reintegration into work, and creating flexible working arrangements, provided that the employee victim of domestic violence has previously informed the Company and provided that the operational and or legal requirements are met.

B. Procedure for receiving and dealing with complaints

(a) The Company has the necessary communication channels and competent people in place for employees to either file a complaint, which will be investigated by the appropriate bodies, or to be informed and sensitized about workplace violence and harassment. The competent person for the receipt, examination and management of the complaint is Lefteris Gkogkos, with whom the employee can contact in person, by phone at +30 210 6853 098 or by e-mail at l.gogos@novamix.gr.

(b) The Company is committed to conducting impartial investigations and examinations of complaints while protecting the confidentiality and personal data of victims and complainants. The complaint handler must perform his duties in a discrete, impartial, discretionary, and confidential manner, protecting the personal data he collects, in full compliance with the Company's Privacy Policy and the procedures for compliance with the General Data Protection Regulation (GDPR).

(c) The Company takes every possible and appropriate measure to effectively protect not only the affected person, but also any other employee who demonstrates in practice his opposition to incidents of violence and harassment or participates in procedures for the investigation of incidents of violence and harassment, retaliation against them being prohibited. In any case, the Company agrees not to proceed with a complaint or any other unfavorable treatment of an employee if it constitutes vindictive behavior or a countermeasure within the meaning of article 14 of Law 3896/2010 (A'207) for an incident of violence and harassment under article 4. Anyone who has been the victim of retaliation or vindictive behavior may report the incident using the procedure outlined in this procedure.

(d) If the reported incident is haunted, the Company takes a series of steps against the accused to ensure that a similar incident does not occur again in the future. The competent body for taking these measures is the Company's Board of Directors, which will decide on the penalty to be imposed on the complainant, as an indicative recommendation to comply, a change of position, a change of hours, a place or method

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of providing work, or termination of the employment or cooperation relationship, among other things.

(e) If requested, the Company and any competent person for the receipt and handling of complaints of incidents of violence and harassment will cooperate and provide any relevant information to the appropriate administrative and judicial authorities.

The interested party may contact the Company's competent reference person for any information and information regarding this policy.



EN ISO 9001:2015



EN ISO 14001:2015



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