



Harassment, Violence and Discrimination Global Policy



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Policy

This policy is based on EU and Greek regulations and reflects a baseline of the behaviours, guidance, prevention, and remedial actions at Navarino globally. However, local laws and regulations will be followed, as applicable, and will supersede when representing a higher standard.

Navarino is committed to maintaining a workplace free from any form of violence, discrimination, and harassment. At Navarino there is no tolerance towards behaviours and actions of violence, harassment, or discrimination. These behaviours are offensive, create a hostile work environment, are a violation of our policies and are in many cases unlawful. Any harassment and discrimination or any form of violence will not be tolerated.

All Navarino people are required to act in a manner that upholds our values, creates a safe, creative, engaging work environment that prevents discrimination, violence, and harassment in the workplace.

This policy follows the guidance and the responsibilities as stated in Part II of the v.4808/2021 (Greek Law). This policy is being adopted pursuant to articles 9 and 10 of L. 4808/2021 and the regulatory legislation passed for their implementation and is applicable on the persons of paragraph 1 of article 3 of L. 4808/2021.

What Is Harassment?

Harassment in the Greek and the European legal system has been defined as:

- Physical, psychological, and/or sexual
- One off incidents or more systematic patterns of behaviour
- Amongst colleagues, between superiors and subordinates or by third parties such as clients, customers, suppliers, trainers, etc.
- Range from minor cases of disrespect to more serious acts, including criminal

Harassment can be a single incident or many incidents. It can be expressed in many ways such as physical violence, verbal, visual, or other forms of expression. Discrimination is the unfair or prejudicial treatment of individuals and groups based on characteristics including race, nationality, ethnic origin, religion, gender, age, political affiliation, sexual orientation, or other identity characteristic. Bullying, mobbing, and sexual harassment are types of harassment.

Sexual harassment is a form of harassment that includes any unwanted and unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's gender and makes the individual feel offended, diminished, uncomfortable, humiliated, intimidated or threatened. Sexual harassment also occurs when a person in authority or influence tries to trade job benefits for sexual favours. This can include hiring, promotion, continued employment, or any other terms, conditions, or privileges of employment.

Invited, mutual, reciprocated, and consensual flirtation, romantic relationship, attraction, or other relationship do not fall under the definition of sexual harassment. However, in such circumstances, such relationships should be in the private sphere. At work, the individuals should be professional, sensitive to any issues of real or possibly perceived conflict of interest, and not distracting in the workplace.



Definitions

Complaint is the expression of dissatisfaction or issue with Navarino related to harassment, violence and discrimination.

A complaint may be alleged by a Navarino employee towards anyone within Navarino. The above is irrespective of role or location. A complaint can be formal or informal.

The **complainant** is the person making a complaint.

Complaine is the person who is being complained about.

Harassment Complaint Form is the documented formal expression of a complaint and includes the facts: what occurred, when, and also any inputs that provide more information related to the complaint.

Policy

This policy applies to all Navarino people globally, those who work under an employment agreement of definite, or indefinite duration, free-lancers, trainees, interns, and also contractors, suppliers of any goods or services and their employees, candidates for employment, volunteers, visitors, and anyone doing business with Navarino, as well as former Navarino employees.

This policy applies to all Navarino areas of the workplace, including all areas where people take breaks or rest, eating spaces, areas of personal hygiene, restrooms, or any space that is related to the company or provided by the company including hotel rooms. This policy also covers the trip to and from work and any trips or travel related to work such as travel for training purposes, conferences, business trips, social work events, activities connected to the work of Navarino or organized by Navarino. This policy covers all means of communication including face-to-face, email, Teams, messages, video, phone, company social media sites, etc.

Every day we strive to embody our Values and principles through our people and our everyday actions and behaviours. Navarino people are encouraged to call out, to intervene, or notify a manager, when-ever possible (while securing they are keeping their own safety) when they witness any violence, discrimination, or harassment.

These guidelines help us build a productive, safe, respectful, fun, and good workplace. Our goal is that all our behaviours- based on our values and level of sensitivity on this subject- are to the point that we simply prevent any incident of violence, harassment, or discrimination at Navarino.

Reporting of incidents

All Navarino, people are encouraged to report when they view instances of discrimination, violence, or harassment and any such behaviours that violate this policy. Any Navarino person who feels harassed or discriminated should report it so that any violation of this policy can be corrected promptly. Any harassing, violent or discriminatory conduct, even a single incident, can be addressed under this policy. Complaints must be done with the below outlined complaint process via the CPO and Legal Counsel.

Any use of physical force and violence is an unlawful event and must be reported immediately to the CPO and Legal Counsel.



All Navarino managers and supervisors are required to report any complaint they receive that falls under this policy or any harassment, violence, or discrimination that they observe or become aware of to the CPO and Legal Counsel.

Navarino however will not tolerate malicious and false complaints aimed at diminishing, deliberate hurting an innocent individual, or damaging the reputation of any individual without cause. In such cases the individual proven to have made a malicious and false complaint will be subject to remedial and/or disciplinary action as fully described below.

Retaliation prohibition

No person covered by this policy shall be subject to adverse action due to reporting an incident of harassment or violence, providing information, or otherwise assisting in any investigation of a complaint. Navarino will not tolerate retaliation against anyone who, in good faith, reports or provides information about discrimination, violence or harassment.

Investigation of Incident

Navarino will conduct a prompt, thorough and balanced investigation that ensures due process for all parties whenever the CPO, as the person responsible for awareness about violence, and harassment. and managing any related complaints. The confidentiality of the investigation will be kept- to the fullest extent possible- and only disclosed based on “need to know” basis for the full investigation to occur effectively and within the principles of this policy. Effective corrective action will be taken whenever discrimination, violence or harassment is found to have occurred. This action will be reviewed, as needed, to ensure that the addressing of the discrimination, violence or harassment is still effective. All employees, including managers and supervisors, are required to provide factual information and to fully cooperate with any internal investigation.

Please note that the Navarino complaint process does not preclude anyone from exercising their right to follow legal avenues as applicable by local law and regulations. In such a situation, please inform the CPO who will guide the individual to the right local authorities or organization appropriate for their situation. In the event of a serious incident, the CEO or other local legal representative may directly file a report to the appropriate local authorities after previously informing the person making the complaint (complainant).

Management of Complaints related to Harassment and Violence:

The CPO is delegated as the “Violence and Harassment Information and Complaint Management Officer” and is responsible for supporting this policy, creating awareness, communicating with employees, being available for any questions or concerns, managing the complaints process, and ensuring the timely communication and guidance towards preventing and combating workplace harassment including sexual harassment, prejudice, and violence.

The **responsibilities** of the CPO are:

a) To communicate in a timely and appropriate way and provide guidance on all questions relating to the interpretation and application on the provisions of this policy, the complaint process, in the event of an incident of violence or harassment, and any related manner. To inform on all measures taken by Navarino to prevent, manage and report harassment and violence in the workplace, including sexual harassment.



b) To work towards securing that Navarino is compliant with this policy, as it is set out. The CPO, together with the Legal Counsel, will receive and investigate complaints in the event of an incident of violence and harassment as described in this policy. To provide support and assistance to the complainant. To work towards finding possible solutions to an established complaint. To prepare a report on the findings of the investigation of such incidents and recommend to Navarino's management the appropriate corrective and/or disciplinary measures in the event of an established incident of Violence and Harassment.

Any Employee, or other individual covered by this policy, may contact the CPO who is the “Violence and Harassment Information and Complaint Management Officer” and the Legal Counsel regarding any incident of harassment, discrimination or violence and can make a complaint:

- a) In person
- b) By telephone/ TEAMS
- c) By email via to: Despina.Malliou@Navarino.gr and George.Koutroumpousis@Navarino.gr
- d) By company post/mail to: Despina Malliou and George Koutroumpousis

The complaint will be recorded and entered into the record and the procedure which is described immediately below will be followed. The CPO will work together with Legal Counsel regarding any complaint.

Internal Misconduct Complaints Process

This section explains the process for all internal misconduct complaints from Navarino people. Such misconduct includes violence, harassment, or discrimination. All complaints are treated as confidential and only the necessary people to manage the process correctly are involved. These persons will form a Complaints Management Team and are:

- The direct manager of the employee making the complaint (complainant) or the Sr. Manager of that Division
- The Chief People Officer (CPO) who has the responsibility to implement and ensure the compliance of this policy
- The Legal Counsel
- The Chief Executive Officer (CEO)

1. Dealing with a complaint informally

Complaints, including those of harassment, violence, or discrimination, can be addressed informally by a co-worker towards his/her manager, and/or towards the CPO and Legal Counsel. The decision to complain informally is fully up to the individual. Sometimes, a good solution might be found via this informal process. If this is not the case, the co-worker can make a formal complaint. The manager or the CPO and Legal Counsel can also encourage people to make official complaints. The manager must inform and involve the CPO and Legal Counsel when an informal complaint has been made.

Please note:

- If a complaint involves the manager, please directly address the complaint to the CPO and Legal Counsel and/or the Sr. Manager.
- If the complaint refers to a Sr. Manager, please inform CPO and Legal Counsel. They will inform the CEO.
- If the complaint refers to the CPO, please inform Legal Counsel and CEO.
- If the complaint refers to the CEO, please inform CPO and Legal Counsel.



2. Formal complaint

A formal complaint should be sent to the CPO and Legal Counsel, as previously described, i.e., in person, via telephone, via company mail, or email. When in writing, please use the Harassment Complaints Form. If the complaint is in person, the CPO will ask the individual to fill-in the Internal Complaints Form. The complaint can also be anonymous and can be sent by company mail, however doing so might limit the ability of the CPO and Legal Counsel to address the complaint in a correct and effective way.

Please note:

- If the complaint refers to the CPO, please inform Legal Counsel and CEO.
- If the complaint refers to a Sr. Manager, please inform CPO and Legal Counsel. They will inform the CEO.
- If the complaint refers to the CEO, please inform CPO and Legal Counsel.

The CPO will acknowledge the formal written complaint within a working day. The CPO, together with Legal Counsel, will review the complaint and launch an investigation. They will also involve the Complaints Management Team.

3. Investigation: Meeting to discuss the complaint

The CPO will invite the complainant to a meeting with CPO and Legal Counsel, normally within 3 working days, to discuss and to better understand the complaint. The complainant should bring any information related to the complaint at this meeting. Other members of the Complaints Management Team may also attend this meeting.

4. Investigation: Gathering further information and notifications

The CPO will lead any needed investigation, together with Legal Counsel, into the complaint in an objective, respectful and balanced matter. The investigation can include:

- Gathering any email exchanges or other written information
- Gathering of any evidence beyond written evidence
- Meetings with others, such as witnesses, that might have relevant information

The CPO and Legal Counsel will keep confidentiality appropriately; however, they will need to notify relevant people that a formal complaint has been received- such as the complaint management team. If the harassment or discrimination complaint is against a manager, then they will inform the higher-level manager.

The CPO will keep notes on the investigation and together with Legal Counsel will look for a solution that is aligned with this policy, national law, and the Values of Navarino.

If the complaint involves a legally defined crime, the CEO, or a local legal representative, will need to report it to the authorities always after consultation with the complainant.

5. Investigation – Inviting the accused in the complaint to a meeting

When the person who the complaint is against is known (the accused), then the CPO needs to inform that there is a complaint against them and to set up a meeting where also Legal Counsel and the Manager of the individual (the accused) will be present. This meeting will be set within a reasonable time and not more than 10 days from the time of the complaint. The only exception can be if more time is needed for the collection of evidence and possible witnesses.

The names of the complainant, the accused and any witnesses must be kept confidential by the CPO and the Complaint Management Team. The person who the complaint is against (the accused) can know of the names of the complainant and any witnesses only after the written consent of the



complainant and witnesses or should the company need to share this information due to legal requirements.

The person who the complaint is against (the accused) has the right to ask for time, of up to three (3) working days from the meeting, to collect any supportive evidence or witnesses.

If the complaint is anonymous, the CPO can only ask for a meeting with the person who the complaint is against (the accused), only after a full investigation and only where there is sufficient and verified evidence against that person.

6. Formal Answer – Recommendations towards the CEO

Upon the completion of the investigation process, the CPO together with the Legal Counsel and the Manager of the complainant will draw up a report with findings, conclusions and proposed corrective actions and remedial measures. The CPO will share the report with the recommendations to the CEO for further actions and decision.

The CPO will send a written answer to the complaint and will also arrange a meeting with the complainant to fully inform on the findings of the investigation and proposals to address the verified incident. This will usually be provided within 15 working days from the first meeting; however, this depends on the complexity and nature of the complaint.

7. Appeal of Decision

If the co-worker making the complaint (complainant) is not satisfied with the answer or solution presented and wishes to appeal, they should let the CPO know in writing.

- The CPO will then invite the complainant to a meeting to better understand the reason for wishing to repeal the decision.
- The CPO will then look at any other information that is provided or any further needed information for the appeal phase.
- The CPO will also set up a formal appeal meeting with the Legal Counsel, the CEO, the CPO, and the complainant.
- Normally within five days from the appeal meeting the CPO will issue a final decision in writing.

8. Remedial and/or Disciplinary Process

Navarino is obligated to take the necessary, appropriate, and proportionate actions towards the accused when there is a verified incident of harassment, discrimination, or violence to appropriately respond to such incidents and to prevent such conduct in the future. The advisory recommendations of the CPO related to the remedial/disciplinary process will be considered, however the CEO has the final decision on what is the most appropriate way to address a verified incident.

Some remedial or disciplinary actions can include: a statement in writing that the accused must comply with the Navarino policies, a warning letter or written reprimand, a change of position/role, changes in work schedule, mode of work or place of work, mandatory support sessions with a psychologist or counsellor, suspension as a disciplinary action, starting a conflict resolution process or registering the incident with the relevant authorities or judicial authorities, or in the case of a serious verified incident, the termination of employment or contract subject to the Article 281 AK.

9. Rights of Employees

Every Navarino employee or other person effected by this policy who has experienced an incident of harassment or violence, beyond the right of internal complaint as described above, also has the right to begin a judicial process which is fully within their rights to address the damages incurred on various levels including physical as well as ethical and emotional. The information provided below is



regarding Greece. For other locations, employees can revert locally for relevant organizations and also connect with the CPO who can support with providing further information.

Employees in Greece can contact the Labor Authority (Epitheorisi Ergasias). They can also contact the Ombudsman (Sinigoro Tou Politi) which is the institution that promotes and oversees the principle of equal and fair treatment.

However, the CPO and Legal Counsel should also be informed of such steps as well as be informed of the incident of harassment or violence so that Navarino can also begin the process as outlined in this policy.

The Ombudsman can be reached at:

Chalkokondyli 17, 104 32 Athens

Email: press@synigoros.gr

Tel: (+30) 213 1306600

The Labor Authority's (Epitheorisi Ergasias S.EP.E) contact information can be found at:

<https://ypergasias.gov.gr/epikoinonia/>

Telephone number for the psychological support of victims of violence and harassment: SOS 15900 and email: sos15900@isotita.gr

10. The Support of Victims of Domestic Violence

Navarino will actively support any employee who is a victim of domestic violence with all appropriate means. Such support could include:

- Flexible working hours upon the request from the effected employee and based on the needs of the role and business requirements
- Taking specific security measures, as needed, in the place of work

Navarino risk assessment of harassment and discrimination

In Navarino we have mostly people of Greek origin and also various other nationalities in our offices in Greece and in our international locations. Approximately 85% of our people are based in Greece. Most of our people have degrees either undergraduate or post-graduate in Engineering, Business or Finance & Accounting. We have an approximate ratio of 70% men and 30% women.

In Navarino 34% of our people are between the ages of 25 to 34 and 42% between the ages of 34 to 44 years old. This means that 76% of our people are between the ages of 25 to 44 years old.

Work is generally highly technical and there is contact with customers and suppliers. Work rhythm can be fast, the work has a high level of complexity and demands strong teamwork, conscientiousness, and initiative.

Risk Analysis:

This is our risk assessment based on our current understanding and knowledge of risks for harassment, violence, and discrimination. This risk analysis refers to the understood likelihood of situations as they are today through also having reviewed harassment, violence, and discrimination history within Navarino. This initial risk analysis will be periodically reviewed and updated as needed. Any incident of harassment is one incident too many as the impact on emotional and physical wellbeing is critical. Our focus at Navarino is to provide a safe work environment for all by the prevention of harassment.



- Harassment including the level of physical violence from externals (contractors, suppliers, customers, and partners) is managed as there are controls as to who has access to our premises at Navarino. Offices are not in high crime areas. Employees do not work very late at night. Areas around offices are well lit. Employees do not carry cash money for the company. The offices have a first entrance that creates a first barrier towards entering. People cannot easily walk in from the street. Doors are always closed and locked. Only people with specific cards or keys can enter. All visitors must sign in after invitation from a manager and delivery people are not allowed to enter our premises and wander. Visitors are escorted by their hosts and meetings are held with more than one Navarino person present. Navarino's culture is well known by suppliers, customers, and other external partners and thus a deterrent and protective environment is created. Thus, we consider the risk of harassment including the level of physical violence from an external person to be low.
- Harassment to the level of physical violence from colleagues is not congruent with the culture of Navarino. The physical set up of our offices with open plan and many offices having glass walls and/or doors makes physical violence difficult to hide. We have people across Navarino who embody our values and thus we consider the risk of physical violence to be low.
- Harassment in the form of bullying and mobbing is not congruent with the culture of Navarino when taking in consideration the values of our people. People work in open plan mostly, and incidents cannot easily be hidden. We recognize the importance of hiring and having people with high moral identity who we expect will (should they ever witness bullying or mobbing) to step up and do the right thing. We also will do trainings and information sessions to sensitize people to these forms of harassment. We estimate the risk of bullying and mobbing to be low.
- Considering the specifics of the diverse individuals at Navarino, the Navarino culture and values, the international nature of the industry- the risk of discrimination and harassment based on ethnic origin, political beliefs, race, religion, within Navarino is considered low.
- Sexual orientation and gender identification could be considered a rather underdeveloped area in certain countries and in Greece. However, the Navarino culture supports a respectful and human rights-based approach to this topic. We will do trainings and information sessions to sensitize people to these forms of harassment. The risk of this type of harassment and discrimination is considered low.
- Sexual harassment in the past has unfortunately been part of the work life in certain companies in Greece and globally. It is also considered to be prevalent in high technology companies in Silicon Valley for example. Research shows that the women most vulnerable to sexual harassment are young (under 30 years of age), financially dependent or financially vulnerable, single, or divorced and with culturally different status than others in the work environment. For men, those most harassed are young, LGBTQ, and members of ethnic or racial minorities. In Navarino we have approximately a quarter of female co-workers within the vulnerable age group. A study by Prorata in Greece published in January of 2021 shows that sexual harassment has been experienced by 65% of the women surveyed. Of those incidents 58% where in the workplace.

In recent years, with women having a larger presence in the workforce of the countries where we are present, the international "me too" movement, and recent similar events in Greece and other countries, societies globally have become more sensitized on this topic. The Navarino culture is firmly against any type of harassment including sexual harassment. Our teams tend to work together in open larger offices. In Navarino we also have women in senior management and middle management roles (three senior managers are women and four middle managers) and we hope that female co-workers will feel more comfortable to go to them to discuss such topics and any questions. There are only a couple of situations where



a woman might work alone with men and in those cases, there is open plan workspace where everyone is sitting together including managers and supervisors. In Navarino, all of our people including our management team embodies our values and our culture is firmly for respect towards all people. We will do trainings and information sessions to sensitize people even more to this form of harassment. The risk is considered low.

Informing and Creating Awareness regarding Harassment and Violence

While we have, at this time, rated our risks low for harassment, violence, and discrimination within Navarino, we will take the following actions to secure a safe workspace and prevent harassment:

- Introduce mandatory trainings for everyone on our new launched People Learn @ Navarino site to further inform and sensitise our people on these topics to support a workplace that nurtures people and is free from any form of harassment, violence, and discrimination
- we will do trainings towards our team leaders and Managers to inform them further on these topics and their responsibilities
- we will also update and adjust the Navarino Labour Regulation (applicable to Greece) to reflect this policy and include any specific measures that we can take together to prevent any incidents of violence, harassment, and discrimination
- we will review our risk analysis at least on a yearly basis and take actions as needed

To support this policy and to create an environment free from any form of stress or worry connected to harassment and violence, we aim to start an anonymous Employee Staff Motivation and Engagement Survey- to encourage full participation- which will also include related questions. Based on the answers, we will then take the necessary actions towards the prevention of harassment and violence in the workplace.

Further, we have the following guidelines and policies that, together with this policy, enable us to create together every day the workplace we want at Navarino:

- Navarino Recruitment Policy
- Navarino People Handbook which outlines how we work and behave at Navarino including the Navarino Values of Integrity, Innovation, Agility and Teamwork
- Navarino Competence Library which is part of our Performance Management approach and considers that “how we do work” is just as important as to “what we deliver”. Competencies connect with our Values and outline the competencies of Navarino including Communication, Teamwork, Learning, and Building a Successful Team
- Navarino Human Rights & Whistleblowing Policy
- Navarino Complaints Management Policy and Process
- Navarino Physical Security Policy

Responsibility to Cooperate with the Relevant Authorities

In order to secure effective communication and transparency, Navarino expressly informs employees that, in compliance with the law, it must always be available to the competent authorities in order to assist in any way in the investigation of any reported incidents of Violence and Harassment. In the context of fulfilling its relevant obligations arising from the above provisions, the company may share, upon request, Employees' personal information with the competent bodies, including special data categories as set out in Article 9 of the GDPR.



Personal Data and GDPR

Navarino, and any companies connected to Navarino, manage the personal data of employees according to GDPR and N. 4624/2019.

The personal data managed during a complaint process will be limited to what is absolutely needed to correctly investigate the complaint and to assess the validity of the complaint. During the investigation, both sensitive as well as other personal data may be processed including details of the incident(s) and facts, evidence, paperwork, and the identities of individuals connected to the incident such as the complainant, the accused, witnesses, or other relevant individuals.

Personal data will be processed by the CPO and the Complaints Management Team for one or more purposes as described below:

- For the purposes of investigating, managing, and processing the complaint, including assessing the facts presented and uncovered via the investigation.
- Assessing the existing risk and for the CPO to prepare the report towards the CEO.
- In order to be compliant with legal requirements
- To manage and fully defend the rights and interests of Navarino towards any claims, disputes, or other possible actions, as needed, and for a period that is deemed necessary to ensure these rights and interests
- The identity of the complainant may be shared or disclosed with our legal advisers or the relevant authorities depending on the type or seriousness of the complaint. In such cases these third parties will have their own independent management processes and obligations to secure data security and GDPR

Personal data will be processed for the time period needed to achieve the above purposes. Where personal data is no longer necessary in the Company, it will either be safely deleted or anonymized.

Anyone who Navarino has their personal data (data subjects) reserve the rights provided for in Articles 15 to 21 of the GDPR, namely they have the right:

- To be informed of their personal data and to be notified by the employing company about the processing of their personal data.
- To have access to their personal data, to request their rectification or erasure, without prejudice to the existence of a valid reason or a specific legal obligation for the processing or keeping of their personal data by the employing company.
- To object at any time to the processing of their personal data on grounds relating to their particular situation, unless the employing company can demonstrate compelling and legitimate grounds for the processing which override their interests, rights and freedoms or the processing in question is carried out for the establishment, exercise, or support of legal claims of the Company.
- To lodge a complaint with the Hellenic Data Protection Authority in the event of a breach of their rights.

Policy Conclusion, Communication, and Ideas for Improvement

The above policy of Navarino seeks to clarify and communicate our stance on harassment, violence, and discrimination and to create a relevant and effective framework for combatting, preventing, and addressing any form of violence, harassment, and discrimination in the workplace. Our goal is to create a workplace which respects, prioritizes, and protects the right of each person for a work environment free from harassment, violence, and discrimination.

Navarino will share with all employees this policy in ways that are effective and clear (in writing or via other ways). Each employee has the right and is invited to suggest ideas, proposals for



improvements or any comments related to this policy which will be taken in full consideration. Any comments should be addressed to the CPO.

This Policy enters into force immediately upon its posting on the bulletin boards of the Company and is amended in accordance with the provisions of applicable law.