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EXPERTS IN ALUMINIUM™

Policy on the Prevention and Combating of Violence and Harassment at Work and the Procedure for Receiving and Investigating Complaints

Policy on the Prevention and Combating of Violence and Harassment at Work and the Procedure for Receiving and Investigating Complaints

Version 2026 #4

1. Commitment

Cosmos Aluminium A.E. (hereinafter referred to as the "Company") maintains a zero-tolerance policy towards incidents of violence and harassment, both within and outside its premises, by any person, and fully respects the right of every individual to work in an environment free from violence, discrimination and harassment.

The Company complies with all measures and obligations relating to the implementation of Articles 58–69, 507–508, 533 and 537 of Presidential Decree 62/2025 (Government Gazette A' 121), as amended by Law 5239/2025 (Government Gazette A' 178), concerning the prevention and management of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, occurring during work, connected with work, or arising out of work.

It is emphasized that the Company does not tolerate incidents of violence and harassment:

- All Group facilities where employees work, receive remuneration, take breaks for rest or meals, use personal hygiene facilities, changing rooms, car parks, outdoor areas, and all offices provided by the Company to employees.
- In locations outside the Group's facilities that are nevertheless related to work, such as during business trips, training programs, events or social activities, as well as while travelling to and from work.
- In employee communications, including communications carried out through information and communication technologies (SMS, email, social media, letters).

2. Purpose

The purpose of this Policy is:

- To create and establish a working environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment.
- To provide information to all employees regarding the protection of employment and the prevention and combating of all forms of violence and harassment in the workplace.
- To state that the Company recognizes and respects the right of every employee to a working environment free from violence and harassment and that it does not tolerate any such behavior, in any form and by any person.
- To define measures for the prevention and mitigation of the risks of violence and harassment at work.
- To provide information on the measures for managing such incidents that the Company has established to prevent their recurrence.
- To establish this Policy as a fundamental condition of cooperation between employees, suppliers and business partners and the Company.
- To define the Company's responsibilities and obligations towards its employees regarding the prevention and management of violence and harassment in the workplace.
- To ensure the effective implementation and regular updating of this Policy.

This Policy is adopted in accordance with Article 62 of Presidential Decree 62/2025 (Government Gazette A' 121), as amended by Law 5239/2025 (Government Gazette A' 178), and the regulatory legislation implementing the same. It applies to the people referred to in paragraph 1 of Article 59 of Presidential Decree 62/2025 (Government Gazette A' 121), and its content is further specified in the sections below.

3. Protected Persons – Employees

This Policy applies to employees of Cosmos Aluminium A.E., irrespective of their contractual status, including persons employed under contracts for specific projects, independent services agreements or salaried mandate agreements; persons employed through third-party service providers; persons undergoing training, including interns and apprentices; volunteers; employees whose employment relationship has ended; job applicants; and workers in the informal economy.

4. Prohibited Forms of Conduct – Definitions

4a. Prohibition of Violence and Harassment at Work

The Company strictly prohibits any form of violence and harassment.

4b. Forms of Violence and Harassment – Indicative List of Prohibited Conduct

The following forms of violence and harassment are strictly prohibited, without limitation:

- Verbal or written sexual harassment, as well as sexual insinuations or insults, directed at employees who have not expressly consented to such comments. This also includes comments or insinuations implying the offer of benefits, such as a salary increase or career advancement, in exchange for sexual favors.
- Comments involving obscene gestures, written or verbal threats, malicious or mocking expressions relating to discrimination based on gender, race, religion, appearance, age, disability or sexual orientation or other personal choices, as well as the dissemination of such comments or expressions.
- Threats of retaliation following the rejection of sexually oriented propositions.
- Cyberbullying and all forms of harassment conducted through visual material, such as posters, animations, cartoons, photographs or videos, which are degrading to an individual based on characteristics protected by law.
- Persistent offensive questions concerning an individual's private life, marital status and sexual preferences. This includes persistent invitations to dates accompanied by psychological pressure or the use of violence.
- Sexual gestures or acts involving unwanted physical contact intended to exert violence, diminish human dignity or exert pressure to enter a sexual relationship.
- Conversations and communications contain obscene, threatening or offensive content.
- Any form of coercion into sexual contact.
- The use of insults and/or threats with the purpose of humiliating an individual, degrading their mental or physical abilities, or exercising physical, gender-based or psychological violence.
- Destruction of personal belongings or property.
- Acts intended to obstruct a person's performance of work, movement or physical integrity, as well as physical monitoring, stalking or pursuit of an individual.

5. Assessment of the Risks of Violence and Harassment at Work

The Company maintains an "Occupational Risk Assessment Study" (ORAS), in which all types of jobs and duties performed at its facilities are systematically assessed.

The study identifies sources of occupational risk and records the protective and preventive measures already implemented and/or proposed to be taken for the protection of employees, including risks and measures relating to the prevention and combating of violence and harassment at work, including sexual harassment.

It is noted that the study includes the identification and assessment of psychosocial risks, including risks of violence and harassment in the workplace and sexual harassment.

The assessment of these risks is carried out in cooperation between the Departments, Divisions and the Occupational Physician, with the aim of properly assessing such risks and, consequently, improving working conditions through the implementation of measures for the prevention, control and mitigation of incidents of violence and harassment.

6. Measures for the Prevention, Control, Mitigation and Management of Such Risks, as well as for the Monitoring of Such Incidents or Forms of Conduct

The Company takes measures to prevent, control, mitigate and manage violence and harassment in the workplace, including sexual harassment, through the establishment of the following practices, as recorded in the ORAS:

- Adoption of this Policy and publication thereof on the Company's website.
- Training employees in the procedure for managing incidents of violence, to ensure an understanding of employees' rights and to ensure that each relevant incident is documented and addressed with respect for human dignity and confidentiality. A relevant record is maintained.
- Open communication between employees and the employer, as well as with their immediate supervisors and colleagues.
- Individual and collective information provided to employees regarding the content of this Policy, particularly to employees working in positions presenting a higher risk of incidents of violence and harassment.
- Encouragement of employees and management personnel to participate in training programs concerning the recognition and management of such incidents.
- Appointment of a Reporting Person ("Liaison").
- Guidance and support for affected employees upon their return to work, whether they are victims of violence and harassment or victims of domestic violence.
- Regular assessment of the effectiveness of the preventive and response measures implemented, as well as review and updating of the risk assessment and relevant measures

7. Employee Information and Awareness-Raising Actions

The Company undertakes the following actions to inform and raise awareness among employees regarding violence and harassment at work:

- Posting this Policy and the "Internal Complaints Management Procedure for Incidents of Violence and Harassment" on the notice boards of the Departments.
- Controlled distribution by email of:
  - The Policy.
  - The contact details of the Reporting Person.
  - The contact details of the competent administrative authorities to which any affected person may exercise their right of recourse.

- Personal communication by senior management, at the level of immediate Directors and Supervisors, with employees at regular intervals regarding relevant matters, such as:
  - **Encouraging** the maintenance of a working environment in which respect for human dignity, cooperation and mutual assistance are fundamental values.
  - **Raising awareness** of the issues concerned.
  - **Scheduling group meetings** for discussion, whenever deemed necessary

- **Individual information** provided to employees by the Occupational Physician at regular intervals on relevant matters, as appropriate.
- **Provision of training**, by any appropriate means and method, to interested people through seminars conducted by mental health professionals, counseling service providers and others.
- **Encouragement of employee representatives** and management personnel to participate in training programs and educational seminars concerning the identification and management of the risks of violence and harassment at work.

8. Information on the Rights and Obligations of Employees and the Employer, as well as of Persons Exercising Managerial Authority or Representing the Employer, within the Scope of Their Responsibilities, in the Event of the Occurrence, Reporting or Filing of a Complaint Concerning Such Incidents, and on the Relevant Procedure

8.1 Rights of a Person Affected by an Incident of Violence and Harassment

In accordance with applicable legislation, a person, as defined in Section 3, who is affected by an incident of violence and harassment in connection with access to employment, during the employment relationship, or even after the contract or employment relationship under which the incident or conduct allegedly occurred has ended, has:

- The right to judicial protection.
- The right to appeal, submit a complaint and request the initiation of a labor dispute procedure before the Labor Inspectorate, within the scope of its statutory powers.
- The right to report the matter to the Greek Ombudsman, within the scope of its statutory powers.
- The right to submit a complaint within the Company, in accordance with the internal complaints management policy provided for in Section 10 below. Such a complaint or report cannot be submitted anonymously.
- In any event, the right to leave the workplace for a reasonable period without loss of pay, retaliation or any other adverse consequence, provided that the person believes that there is an imminent serious risk to their life, health or safety, particularly where:
    - The perpetrator is the employer themselves or a person exercising managerial authority; or
    - The employer fails to take the necessary appropriate measures, as referred to in Section 10.5, to restore a peaceful working environment; or
    - Such measures are insufficient to stop the violent or harassing behavior.
- In the case referred to in paragraph (e), the person leaving the workplace is required to inform the employer in writing beforehand, describing the incident of violence or harassment and the circumstances supporting their belief that there is an imminent serious risk to their life, health or safety.

8.2. Rights of the Company

The Company takes into consideration the following:

In cases where no risk exists or the risk has ceased to exist, and the affected employee (the person concerned) refuses to return to their position, the Company shall have the right to refer the matter to the Labor Inspectorate, requesting the resolution of the dispute.

8.3. Contact Details of the Competent Administrative Authorities to Which the Affected Person Has the Right to Appeal

Labor Inspectorate:

Labor Relations Inspection Department of Larissa

6 Farsalon Street, 41335 Larissa, Greece

tkelarisas@yeka.gr

Public opening hours: Monday – Friday
09:00 a.m.– 1:00 p.m.

2410 – 625 650
2410 – 671 910
2410 – 624 923

Complaints Telephone Line of the Labor Inspectorate

Available 24 hours a day, 7 days a week, free of charge

Citizen's Advocate

17 Chalkokondyli Street, 104 32 Athens, Greece

press@synigoros.gr

Public opening hours: Monday– Friday
08:30 a.m.– 2:00 p.m.

213 – 1306 600

Immediate Psychological Support and Counseling Service for Women Victims of Gender-Based Violence

SOS Helpline **15900**

9. Protection of Employment and Support for Employees Who Are Victims of Domestic Violence, Where Possible, Through Any Appropriate Means or Reasonable Accommodation

The Company recognizes its social responsibility in relation to incidents of domestic violence, which may also occur in the workplace, and declares its practical support for affected employees through every appropriate means and method.

Domestic violence may take the form of physical violence, sexual harassment, stalking or monitoring by current or former partners or spouses who are present in the same working environment.

In addition, the Company recognizes such forms of violence when exercised against an employee during remote work.

10. Communication Channels – Responsible Persons

10.1 Complaint Reception Procedure

The Company is committed to fostering a business culture of transparency and accountability. Accordingly, it requires the highest possible standards of professional and ethical conduct from all employees and business partners.

In order to strengthen the prevention of offenses, unethical conduct and violations, the Company seeks to ensure that any person who has concerns or suspicions regarding the above matters in connection with the Company's operations has the opportunity to report them, with the option of remaining anonymous, without fear of retaliation by the Company.

In this context, we have established cooperation with an independent external reporting system to facilitate and make the reporting of complaints easier and safer

https://cosmosaluminium.whistlefreen.app/whistle

10.2 Appointment of a Reporting Person

Alternatively, an employee may submit an oral or written complaint to the Reporting Person or their deputy.

The Reporting Person is responsible for providing guidance and information to employees regarding the prevention and management of violence and harassment at work. In addition, the Reporting Person is responsible for receiving, examining and managing complaints or grievances submitted by affected persons concerning acts of violence or harassment.

For the purposes of this Policy, Ms. Eleni Marinou is appointed as the Reporting Person ("Liaison"): (T: 2410 567554, email: emarinou@cosmosaluminium.gr)

For the purposes of this Policy, Ms. Styliani Keoglou is appointed as Deputy Reporting Person ("Deputy Liaison") in cases of absence, incapacity or conflict of interest involving the regular Reporting Person: (T: 210 4898520, email: skeoglou@etem.com.

Wherever this Policy refers to the Reporting Person, this shall also include their deputy.

10.3 Investigation and Examination of Complaints with Impartiality and Protection of the Confidentiality and Personal Data of Victims and Reported Persons

In this context:

- The Reporting Person shall promptly investigate every complaint and collect all necessary information with absolute discretion, confidentiality and impartiality, while respecting human dignity.
- The Reporting Person may interview witnesses and supervisors to whom the affected person has reported the matter, speak with the complainant and the reported person, and request the submission of documents and evidence.
- The affected person shall receive regular updates regarding the progress of the examination of their complaint and shall also receive the results of the investigation upon its completion.
- The Reporting Person shall make every effort to resolve the incident amicably, where feasible.
- At the request of the affected person, the Company may transfer them to another position or modify their working hours. The Company may also transfer the reported person to another position, either during or upon completion of the investigation.
- The information and evidence collected shall be treated as strictly confidential and maintained by the Reporting Person as confidential material. In all cases, confidentiality and the protection of Personal Data shall be maintained in the performance of the above duties.
- The Reporting Person shall inform the Company's Management of the existence of a complaint and submit a written report containing the findings of the investigation. The findings shall also be communicated to the complainant and the reported person for their information.
- The investigation of the report/complaint and preparation of the findings shall take place as soon as possible and no later than three weeks after submission of the complaint.

10.4 Prohibition of Retaliation Against the Affected Person

The Company undertakes to comply with the obligation to prohibit retaliation against affected persons, in accordance with Article 66 of Presidential Decree 62/2025 (Government Gazette A' 121) and the provisions of labor legislation.

The Company emphasizes that all incidents shall be handled and investigated objectively and undertakes to maintain confidentiality and protect Personal Data.

The Company prohibits any adverse treatment of the affected person by any employee or member of Company management and ensures their timely removal from the location of the incident to prevent retaliatory behavior against them because of submitting a complaint concerning an incident of violence or harassment.

10.5 Description of Consequences Where Violations Are Established

- In all cases, the Company shall give the reported person the opportunity to provide an explanation before taking any decision, unless it considers that doing so would put the affected person at risk or that it has conclusive evidence concerning whether the relevant act was committed.
- The Company shall take all necessary, appropriate and proportionate measures, as applicable in each case, against the reported person to prevent and ensure that a similar incident or behavior does not recur. Such measures may include:
  - A formal instruction to comply;
  - A change of position, working hours, workplace or manner of providing work; or
  - Termination of the employment or cooperation relationship.

- Referral of the matter to the competent authorities (Labor Inspectorate, judicial/prosecutorial authorities, Greek Ombudsman, etc.) where the incident is unlawful and subject to criminal or administrative sanctions.
- Finally, the Company shall also examine cases of manifestly malicious complaints, which shall be further investigated and handled on a case-by-case basis and by any lawful means and procedure, without compromising the dignity of the complainant.

10.6 Cooperation with and Provision of Relevant Information to the Competent Authorities

The Company, the Liaison and any other person responsible for receiving and managing complaints of violence and harassment shall cooperate with every competent public, administrative or judicial authority which, either on its own initiative or following a request submitted by an affected person, within the scope of its powers, requests the provision of documents, evidence or information.

The Company is undertaking to aid and access to such information.

In this context, all information and evidence collected, whether in physical or electronic form, shall be retained by the Reporting Person in accordance with the applicable legislation on the protection of personal data.

11. Communication of the Content of this Policy

This Policy shall be communicated to all employees of the Company by any appropriate means and shall be posted in the workplace and on the Company's website.

12. Responsibility for the Policy

- **Approval and Review:**

This Policy has been approved by the Company's Board of Directors and is countersigned by the Chairman of the Board of Directors.

In the event of any discrepancy between the content of this Policy and applicable national legislation or other standards in force, the more stringent requirements shall prevail.

- **Monitoring of Implementation:**

The competent Management team (Members of the Board of Directors, Chief Financial Officer, Commercial Director and Production Director) is responsible for reviewing and monitoring the content of this Policy at least once a year during the Management Review.

In addition, this team shall oversee the provision of training required for the purposes of this Policy.

The Chairman of the Board



Xenofon I. Kantonias

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