

Policy for ANTI VIOLENCE - ANTI HARASSMENT in WORKING ENVIRONMENT

Executive summary

IDE has a zero-tolerance policy for any form of violence (physical, psychological, moral) and harassment, which may occur during the course of, or be related to, or arise from work, including gender-based violence and harassment and of sexual harassment. As it is already provided in IDE **Code of Business Conduct and Ethics**, IDE is committed to providing a **safe and healthy working environment** taking into account all its functions and activities such as workplaces, transportation, communications, etc. **All IDE employees, with any employment relationship and regardless of hierarchical position, have an obligation to behave with respect to the personality and dignity of others.**

Thus, IDE has issued the **new policy “ANTI VIOLENCE - ANTI HARASSMENT POLICY in WORKING ENVIRONMENT”** in accordance with Greek Law **4808/2021**. This policy establishes a prevention framework, as well as procedures for dealing with and combating violence and harassment in the work environment as follows:

Prevention Framework

- The **prevention measures** include, among others, review of the **risk assessment** considering any inherent risk arising from the nature of the activity, the work location, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks relating to specific groups of workers (e.g., new recruits, trainees); the **raising of awareness** by the notification of the policy/procedure to the internal corporate network, on the company's official website, the providing of information, and **guidance** of the employees as well as the **active participation** of the superiors in the implementation of the policy.

Rights of the affected persons

- Any person covered by this policy who suffers an incident of violence and harassment against him/her, has **the right to leave** the workplace for a reasonable time, without loss of salary or other adverse consequence, if in his/her reasonable belief there is an imminent serious danger to life, his health or safety, in particular, when the employer is the perpetrator of such behavior or when the employer does not take the necessary appropriate measures (see below under Measures), in order to restore working peace, or when these measures are not capable of stopping the behavior violence and harassment. In this case, the leaver is obliged to inform IDE (the employer) beforehand in writing, stating the incident of violence and harassment and the incidents that justify his/her belief that a serious risk to his/her life, health or safety is imminent.
- **Administrative sanctions** according to law may be imposed against the employer for violation of the labor legislation, when an employer or a person exercising the managerial right or representing the employer violates the prohibition of violence and harassment when entering into or refusing to enter into a legal relationship with a person covered by the Policy or during its development, duration or termination.

- In any case, the violation of the prohibition gives rise, among other things, to a **claim for full compensation** of the affected person, which covers his positive and collateral damage, as well as moral damage.

Procedures for dealing with and combating violence and harassment

- Any person who is affected by an incident of violence and harassment against him or any person who becomes aware of incidents of violence and/or harassment at work in violation of this Policy may **report** the incident verbally or in writing, by name or anonymously, formally or informally, choosing one or more of the available communication channels (email: report@intracomdefense.com).
- IDE, through the **Complaints Management Committee** consisting of the Head of HR, the Head of Legal Services and the superior director/manager of the victim and the alleged offender, manages and investigates any complaint submitted, in a timely, serious and effective manner, **impartially** and with absolute **protection of the confidentiality and personal data** of the victims and alleged offenders, and decides on taking action (substantiated complaint) or failure to take measures (unfounded complaint), to the detriment of the person complained of.
- In the case of establishing the merits of the complaint, IDE, after a relevant recommendation of the **Complaints Management Committee**, decides to take the **necessary and appropriate measures** on a case-by-case basis to protect the affected person and against the person complained of.
- IDE supports the rights of the affected persons and ensures that there is **no retaliation** against the aggrieved person.

Measures

- When an employee or another person covered by the Policy violates the prohibition of violence and harassment, IDE as the employer is obliged to take the necessary appropriate and proportionate measures in each case at the expense of the offender, in order to prevent and prevent a similar incident from happening again the behavior of violence and harassment.
- These measures may **include recommending compliance, changing the position, time, place or way of providing work or terminating the employment or partnership relationship**, subject to the prohibition of the abuse of rights in Article 281 of the Civil Code.

Cooperation of Employer with the competent authorities

- IDE will **cooperate with the competent authorities** and provide them with any relevant information, if requested.