

## Human Rights Policy

The human rights policy is a reference guide for the company's approach and responsible practices.

Over the years, the expectations as well as our responsibility towards our employees, customers, suppliers and all our partners necessitate to continuously commit ourselves to respect and promote Human Rights in all our actions.

Guided by the forenamed tenor, we are committed to their constant defense seeking to chart a specific direction that will ensure our sustainable development.

We seek to drive positive change and create ever better conditions for a better world. We want the human factor to be at the heart of every decision we make.

Taking into account the responsibility of our relationships and activities as a company that grows internationally, we focus on the implementation of international and domestic regulations, laws and provisions that look forward to these directions.

We comply with and follow the provisions of:

- The Universal Declaration of Human Rights by the United Nations General Assembly
- The Tripartite declaration of principles concerning multinational enterprises and social policy (MNE Declaration) and the core conventions of International Labour Organization (ILO),
- The proposals of the Organization for Economic Co-operation and Development (OECD)

Our aim is that this hereunto policy should be applied by all our employees and partners not only in the context of good conduct but also when making decisions concerning vertical issues of the company.

ElvalHalcor has the necessary channels to receive reports of violations or suspected non-compliance with its Human Rights & Principles Policy, and more generally of violations of Intellectual Property Rights that take place within it, and are intended to manage them promptly and appropriately, aiming to normalize and redress any irregularity.

In any case, ElvalHalcor, protects the anonymity of these actions whether they involve internal or external reporting (i.e. in relation to a partner, e.g. a supplier). We emphasize that we reject the possibility or even suspicion of consistency or retaliation to anyone who makes a report.

### Human Rights

1. We strive to uphold human respect, recognizing the value of cultural, civil and cultural diversity and ensuring their continued protection.
2. We reject all forms of physical or verbal violence and any tactics that may offend the mental health of employees, and closely monitor the potential for abuse of positions of power, both on and off our premises.

3. We embrace equality, providing work and development opportunities for all genders, while advocating non-discrimination, promoting diversity in terms of religion, culture, age, gender and sexual identity of employees. In this way, we aim to create a creative and collaborative environment.
4. We oppose any form of labour exploitation, forced labour or slavery, and we are against any form of child labour, applying in our recruitment policy the age limits provided by the legislation of each country in which we operate.
5. We are committed to the continuous effort to ensure the Health of all ElvalHalcor employees, recognizing its importance as the most basic commodity, and we attend to continually attune to all international regulations and standards related to health and safety in workplace.
6. We position ourselves responsibly in favor of the environmental protection, understanding the sustainable development framework, promoting and implementing in all possible ways the provisions thereof. For the same reason we apply recycling methods in the majority of our operations.
7. We recognize and promote the educational reinforcement of our employees at all levels, considering its importance, and we welcome all efforts for their development and progress.
8. We seek constant contact between employers and employees, forming channels of communication through which the requests and suggestions of the whole are communicated and divulged. Thus, we build relationships of substance and trust, while respecting the right of assembly in accordance with current legislation.
9. We respect the privacy and data confidentiality of all ElvalHalcor employees and partners - active or inactive - and therefore we treat all relevant information with confidentiality and integrity. We follow the provisions of the General Data Protection Regulation (GDPR) and obtain congruous acquiescence where required.
10. We demonstrate zero tolerance of child labour, which implies that at any stage of our operation it is not acceptable. This policy applies equally to our partners and suppliers.
11. We protect marriage and family rights for all employees.
12. We uphold the right of fair and equitable remuneration for every employee focusing on ensuring an adequate living standard.
13. We support the defense of respite and recreation rights in the context of ensuring workers' mental health and maintaining an appropriate work-life balance.

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