

The company complies with all measures and obligations regarding the implementation of the provisions of Part 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. The company prohibits any form of violence and harassment that manifests itself during the course of work or is connected to it or arises from it, including violence and harassment based on gender and sexual harassment. a) By violence and harassment are meant the forms of behavior, acts, practices or threats thereof, which aim, lead or may lead to physical, psychological, sexual or financial harm, whether they occur individually or repeatedly, b) as harassment are understood the behaviors, which have the purpose and effect of violating the dignity of the person and creating an intimidating, hostile, humiliating, humiliating or aggressive environment, regardless of whether they constitute a form of discrimination and include harassment based on gender or for other reasons of discrimination. Harassment due to gender means the forms of behavior related to the gender of a person, which have the purpose or result of violating the dignity of that person and creating an intimidating, hostile, humiliating, humiliating or aggressive environment according to article 2 of Law 3896/2010 (A'107) and par. 2 of article 2 of Law 4443/2016 (A'232). These forms of behavior include the sexual harassment of Law 3896/2010, as well as the forms of behavior linked to the sexual orientation, expression, identity or gender characteristics of the person. The purpose of this policy is to create and consolidate a work environment that respects, promotes and ensures human dignity and the right of every person to a world of work free of violence and harassment. The company declares that it recognizes and respects the right of every employee to a work environment free of violence and harassment and that it does not tolerate any such behavior of any kind by any person. This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the applicable regulatory legislation and covers the persons of paragraph 1 of Article 3 of Law 4808/2021 and concerns all forms of violent behavior and of harassment against the above persons which can take place: (a) in the workplace, including public and private spaces and spaces where the employee provides work, receives remuneration, takes a break, especially for rest and food, in areas of personal hygiene and care, changing rooms or accommodation provided by the employer, (b) in commuting to and from work, other commuting, travel, training, as well as work-related events and social activities and (c) during communications that work-related, including those carried out through information and communication technologies.

A. Preventing and combating violence and harassment at work

The company takes all the appropriate and necessary measures in order to prevent and deal with such incidents and forms of behavior on the one hand. a) assessment of the risks of violence and harassment at work: The company takes and implements all the necessary measures to identify the risks associated with violence and harassment, taking into account, among other things, any inherent risk arising from the nature of the activity, the job position, factors such as age and other characteristics that constitute reasons for discrimination, as well as the risks that concern specific groups of workers. To assess these risks, the company utilizes all the legal and prescribed occupational risk assessment tools, such as those available for our country. b) measures to prevent, control, limit and deal with these risks, as well as to monitor such incidents or forms of behavior, implemented by the company are: 1) Encouragement to maintain a working climate, where respect for human dignity, cooperation and mutual assistance are core values, 2) Ensuring open communication with the company and direct supervisors and colleagues, 3) Implementing and following a report and complaint management process, 4) Ensuring that employees have the necessary training/information to perform their duties, especially in jobs that have a higher risk of incidents of violence and harassment. 5) Implementation of technical measures, such as improving lighting, etc., 6) Taking actions to inform and raise awareness of employees in healthy behavior patterns (e.g. avoiding substance use, addiction), but also for issues concerning vulnerable categories of

workers, 7) Guidance and support to victims of violence and harassment or victims of domestic violence to reintegrate into the workplace, 8) Training of employees in the procedures for managing incidents of violence, 9) Evaluation, through transparent and meritorious procedures, on a regular basis the effectiveness of applied preventive measures and countermeasures and review/update of risk assessment and measures. c) staff information and awareness actions: The company ensures the provision of continuous and uninterrupted information and the provision of information through accessible formats, depending on the case, on the risks of violence and harassment, as well as on the related prevention and protection measures, on the procedures that exist at the company level and for the possibilities given by law in case of such incidents. The company in the context of staff awareness: organizes targeted staff meetings to discuss relevant issues and address potential risks early, organizes and conducts seminars with mental health specialists or counseling service providers, representatives of voluntary organizations encourages the participation of employee representatives and management executives in training programs and educational seminars related to the recognition and management of the risks of violence and harassment at work, d) information on the rights and obligations of employees and the company, as well as persons exercising managerial authority or representing the employer, in measure and to the extent of their own responsibility, in case of occurrence or reporting or complaint of such incidents, as well as for the relevant procedure. In particular, the company constantly informs the staff and it is accepted that in case a person is affected by incidents of violence and harassment during access to employment, during the employment relationship or even if the contract or the employment relationship in the context of which it is alleged that the incident occurred or her behavior has ended, she has: a) the right to judicial protection, b) appeal, filing a complaint and applying for a labor dispute to the Labor Inspectorate, within the framework of its statutory powers, c) reference to the Ombudsman Citizen, within the framework of his responsibilities, as well as d) a complaint within the company in accordance with the complaints management policy, e) designation of a reference person ("liaison") to guide and inform employees regarding the prevention and response to violence and harassment at work. His role is to guide and inform employees, regardless of whether or not they come to him about an incident or complaint about an incident of violence and harassment. The staff can address the reference person via the electronic address : info@oceanic.com.gr f) employment protection and the support of working victims of domestic violence, if possible, by any appropriate means or reasonable adjustment. The company is against every incident and phenomenon of domestic violence and to this end it takes measures and implements policies to protect its staff who have become the recipient of such behaviors, namely: employment protection, provision of special leave or flexible work arrangements upon request of the employee victim of domestic violence , with the aim of supporting him in maintaining work and in orderly reintegration after such incidents, especially in cases where there are minor children or children with disabilities or serious illnesses.

B. Procedure for receiving and reviewing complaints.

Any employee against whom any incident of violence or harassment occurred may submit a written complaint to the competent person designated by the company. The complaint can be submitted in person or by e-mail, specifically to the e- mail address info@oceanic.com.gr It is not possible to submit a complaint verbally or by telephone.

a) communication channels - competent persons: Our company has appointed a competent person who will receive, examine and manage the complaints or complaints of the affected persons for violent or harassing behaviour. This competent person informs the victim of his possibility, at any stage of the procedure followed within the company, to also submit a complaint to the competent administrative authorities within the framework of their competence (Labour Inspectorate and Ombudsman) as well as to the judicial authorities, at his option.

b) investigation and examination of complaints with impartiality and protection of the confidentiality and personal data of the victims and the complainants: The company through the above competent person undertakes to receive and not prevent the receipt of complaints, to investigate and examine the complaints with impartiality and respect for human dignity, as well as taking immediate measures to protect the victim. The competent person thoroughly investigates each complaint and collects any information necessary regarding it, always under the condition of maintaining confidentiality and protection of Personal Data, which are collected during the exercise of the above tasks.

c) the prohibition of retaliation against the affected person and the prohibition of victimization of the complainant: The company undertakes to comply with the obligation to prohibit retaliation in accordance with article 13 of Law 4808/2021 and with the provisions of the labor legislation. Retaliating against and victimizing the complainant is a serious violation of this policy and carries consequences for the person doing so.

d) the description of the consequences upon detection of violations: According to par. 2 of article 12 of Law 4808/2021 when the employee or another employee violates the prohibition of violence and harassment in article 4 of the same law, the company is bound to immediately take the necessary appropriate and proportionate measures in each case at the expense of the complainant, in order to prevent and prevent a similar incident or behavior from repeating itself. These measures are: a) recommendation of compliance, b) change of position or hours or place or method of providing work, and c) the termination of the employment or partnership relationship, subject to the prohibition of the abuse of rights in Article 281 of the Civil Code

e) the cooperation and provision of any relevant information to the competent authorities, if requested: The company and the above competent person dealing with the reception and management of such complaints at company level cooperate with any competent public, administrative or judicial authority, which, either ex officio or upon submission of a request by an affected person, within the framework of its competence, requests the provision of data or information and undertakes to provide assistance and access to the data (par. 1 of article 5 of Law 4808/2021). For this purpose, any data collected, in any form, is kept in a relevant file in compliance with the provisions of Law 4624/2019 (A'137).