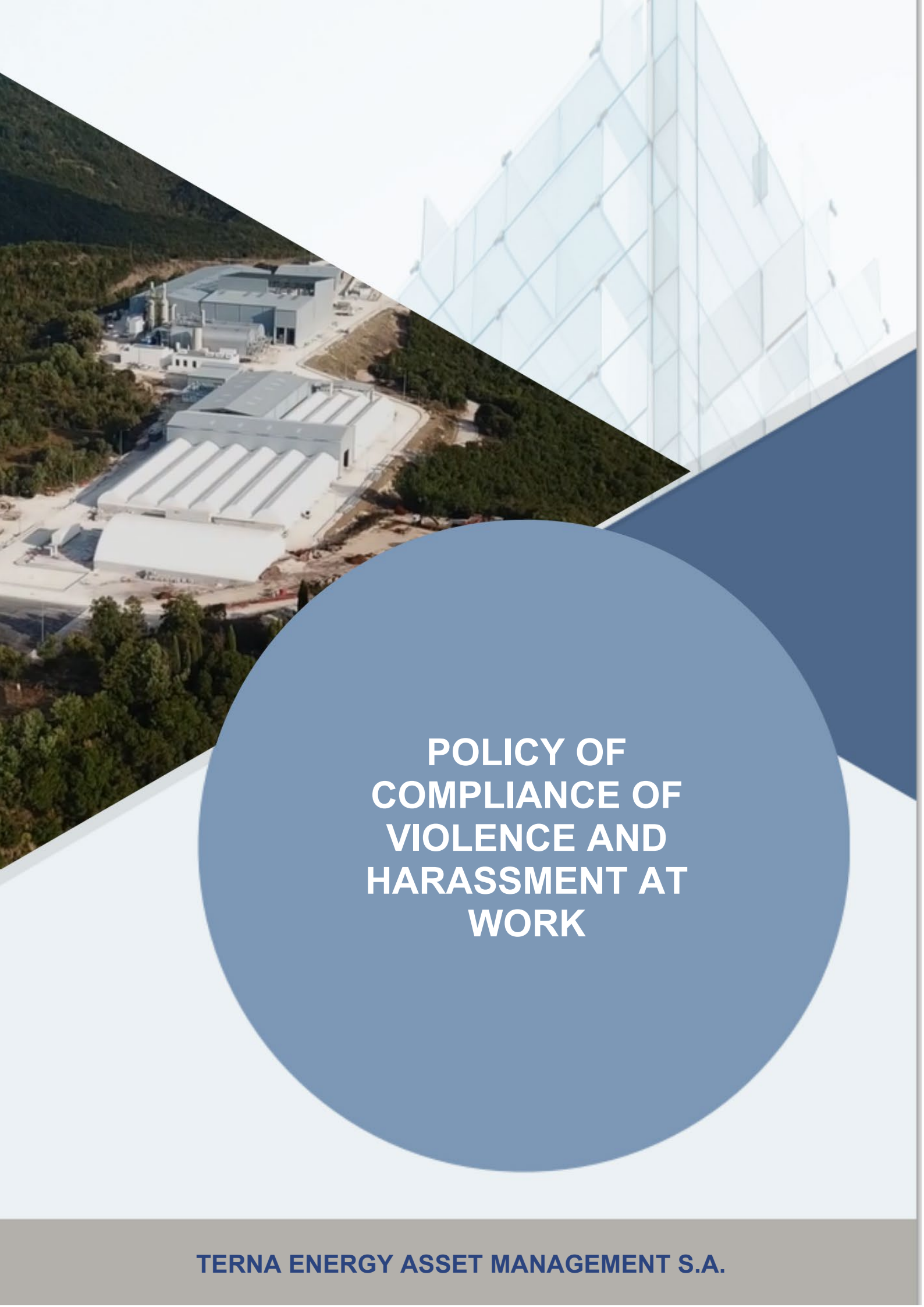




POLICY OF COMPLIANCE OF VIOLENCE AND HARASSMENT AT WORK

1. PURPOSE AND SCOPE

1.1 PURPOSE

The purpose of this Policy is to establish the basic guidelines that all Company staff must follow to prevent and combat violence and all forms of harassment, in the workplace and in situations that occur during work, whether related to or arising from it.

1.2 SCOPE

The entire Company.

2. PARTIES INVOLVED – RESPONSIBILITIES

All employees.

3. DEFINITIONS – ABBREVIATIONS

Violence and harassment

“Violence and harassment” means the forms of behaviour, acts, practices, or threats thereof that are intended to result in, or are likely to result in physical, psychological, sexual, or economic harm, whether occurring on a single occasion or repeatedly.

Harassment

“Harassment” means a form of behaviour that have the purpose or effect of violating a person’s dignity and personality and creating an intimidating, hostile, degrading, humiliating, or hostile environment, regardless of whether they constitute a form of discrimination, and includes harassment based on sex or other grounds of discrimination.

Gender-based harassment

“Gender-based harassment” means conduct related to a person’s gender that has the purpose or effect of violating that person’s dignity and creating an intimidating, hostile, degrading, humiliating, or aggressive environment, or disproportionately affects individuals of a specific gender, and includes sexual harassment.

Psychological harassment

“Psychological harassment” is defined as any persistent, repeated, and/or systematic abusive behaviour in the workplace or in connection with work that includes verbal or written threats, actions, gestures, or work practices that, intentionally or unintentionally, are harmful to a person’s personality, dignity, or physical or psychological integrity of an individual, or causes

a deterioration of the work environment, or jeopardises the individual's employment, or creates a hostile, intimidating, humiliating, or offensive environment. Psychological harassment can result from the behaviour of one or more individuals.

Domestic violence

"Domestic violence" refers to all acts of physical, sexual, psychological, or economic violence that occur within the family or the home, regardless of biological or legal family ties, or between former or current spouses or partners, and regardless of whether the perpetrator shares or previously shared the same residence with the victim.

4. REFERENCES

Complaints procedure

5. POLICY DEVELOPMENT

5.1 Assessment of the Risks of Violence and Harassment in the Workplace

Risks are identified and assessed in detail in the Company's occupational risk assessment study, which is systematically monitored by the Safety Technician and the Manager of the Company's Health and Safety System.

The following are examples of violence and harassment in the workplace:

- Physical or verbal assault or abuse.
- The use of physical or electronic means to threaten, abuse, or degrade a person's dignity.
- Insinuations, indecent photographs, and obscene gestures intended to disparage an employee's character, gender, religion, or sexual orientation.
- Spreading malicious rumours, either individually or as a group, about an employee's character, gender, religion, or sexual orientation.
- Abusing a position of power within the company to undermine an employee's self-esteem.
- Abusing a position of power within the Company to act arbitrarily toward subordinates, e.g., cancelling their participation in training sessions, or blocking their promotions and pay raises.
- Abusing a position of power within the Company to propose a sexual relationship.

5.2 Measures to Address the Risks of Violence and Harassment in the Workplace

More specifically, TERNA ENERGY ASSET MANAGEMENT S.A., in accordance with this policy:

- Encourages staff to report such incidents in accordance with the complaints procedure.
- Designates the Compliance Officer as a point of contact for receiving complaints and providing clarifications to staff. Employees may submit their questions or complaints either to the email address compliance@gekterna.com or through the anonymous reporting platform <https://gekterna.integrityline.com/frontpage>.
- Provides guidance and support to victims of violence and harassment, or victims of domestic violence, to help them reintegrate into the workplace.
- Plans training and awareness-raising activities for staff on issues related to violence, harassment, and the Code of Conduct in general.
- Provides all employees with access to this Policy and the related Procedures.
- It protects individuals who file complaints and prohibits retaliation or adverse treatment in connection with such complaints.
- Monitors, through the Management Systems in place, the implementation of measures to prevent workplace violence and harassment.

5.3 Staff Information and Awareness-raising Initiatives

TERNA ENERGY ASSET MANAGEMENT S.A. plans training and awareness-raising activities for its staff, which it incorporates into the company's annual training program. Examples of such actions include the following:

- Informing staff through awareness training either in person or via e-learning.
- Posting the Policy and the available Procedures on a website accessible to all employees.
- Development of specialised training programs for staff in leadership positions.
- Scheduling special on-site training at construction sites and other workplaces outside the Company's headquarters.

5.4 Employees Rights and Obligations

Every employee has the right to:

- Be treated with respect and courtesy.
- Not to be subjected to violent behaviour, harassment, including sexual and gender-based violence, discrimination, or intimidation.

- To report any incident of prohibited conduct in the workplace (in accordance with this Policy, as detailed below) without being victimised or suffering any other adverse consequences or retaliation.

Every employee is required to:

- Comply with this Policy and all applicable and current Procedures for the purpose of protecting both themselves and other Company employees.
- Immediately report any incident of violence or harassment to their supervisor.
- Cooperate in the investigation of any complaint that may have been filed in accordance with the procedure outlined below.
- Participate in the Company's training initiatives and programs regarding incidents of violence and harassment.

In addition, all Company employees:

- Are entitled to judicial protection
- May file a complaint with the Labour Inspectorate
- May file a report with the Ombudsman or the Labour Inspectorate
- May file a complaint with the Company's Compliance Officer, who is required to investigate and review the complaint impartially while protecting the whistle-blower's confidentiality and personal data.

Additional Responsibilities of Directors and Supervisors

In particular, the Company's directors and supervisors are also required to:

- Ensure the implementation of this Policy within their respective areas of responsibility.
- Establish appropriate standards of conduct within their area of responsibility.
- Refrain from engaging in undesirable or prohibited conduct themselves while performing their duties.
- Take immediate action upon becoming aware of any instance of prohibited conduct.
- Encourage employees to report any incidents of violence or harassment that they have experienced or witnessed.
- They must immediately notify the Compliance Officer of any incidents of violence or harassment that have occurred within their area of responsibility.

5.5 Domestic violence

The Company takes measures, to the extent possible, to protect the employment of employees who are victims of domestic violence and to support them.

Any employee who has been a victim of domestic violence that extends into the workplace may report this incident verbally or in writing to their supervisor or the Compliance Officer so that the Company may be informed and take the appropriate and necessary measures, such as notifying and cooperating with the relevant authorities.

5.6 Contact Information for Authorities

Greek police

- Call **100** (available 24/7)
- If you are unable to speak, send a text message (SMS) to 100, with the following:
 - ❖ Exact address
 - ❖ Full name
 - ❖ Type of emergency (e.g., “My life is in danger,” “I am being abused by my spouse”)

Domestic violence

- For more information, visit the following Hellenic Police website on domestic violence:
http://www.astynomia.gr/index.php?option=ozo_content&perform=view&id=2030&Itemid=421&lang

General Secretariat for Demographic and Family Policy and Gender Equality (G.S.D.F.P. & G.E.):

- National SOS Hotline 15900 (available 24/7)
- Women can contact us online via email at: sos15900@isotita.gr

Single Contact and Citizen Service Number for Social Security, Labour, and Social Issues

- <https://1555.gov.gr/>

Useful Websites

- <https://isotita.gr>
- <http://womensos.gr>

6. RECORD KEEPING

As described in the Reporting Procedure.