



HUMAN RIGHTS POLICY

Included in COMPREHENSIVE HUMAN RESOURCES POLICY

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General Information

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Involved Units	Chief Executive Officer Human Resources Unit
Code of Policy / Procedure	11
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Prepared by	Head of Human Resources	01.11.2023
Reviewed by	Internal Audit Unit Compliance Officer	07.11.2023
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Approved by	Boards of Directors	30.06.2025

Revision / Amendment History			
Effective Date	Code	Chapter / Paragraph	Rationale for Changes
27.07.2023	1.0		
17.11.2023	2.0	H/R Policy 2 - Paragraph 4	Amendment to the Code of Professional Conduct and Ethics

H/R Policy 1: Human Rights Policy

1. Equal opportunities

Trastor REIC (the Company) is an equal opportunities employer and follows the policy on human resources management regardless of gender, race, age, colour, religion, sexual orientation, nationality or physical ability. Equal opportunities are about treating all people fairly and impartially and creating the right conditions that encourage and respect diversity and ensure dignity, both in the workplace and in the wider society. The Company's equal opportunities policy complies with the Greek Law on Non-Discrimination in Employment.

The Company is committed to ensuring an excellent working environment in which all human resources have equal opportunities. To this end, it has established human resources management policies and procedures based on the above principles concerning: selection and utilization, training, remuneration and benefits, career development and progression, promotions, transfers, termination of employment, relations with customers and the community in general.

It recognizes its responsibility for equal opportunities and accepts only the best behavior and respect for the dignity of each employee's personality from all its staff. It undertakes not to employ minors in accordance with and in compliance with local legislation and not to force any employee directly or indirectly into forced / compulsory labor.

2. Ensuring Human Rights at Trastor

To ensure human rights and avoid any form of discrimination in the work environment, Trastor has established rules and procedures which are communicated to all employees from the moment of their employment.

Based on the established practices on human resources management issues, the Board of Directors confirms the relevant policies. Further, the Compliance Officer ensures that the relevant policies are disseminated to all the Company's human resource

At the same time, the HR oversees the implementation of relevant practices that ensure the application of human rights in accordance with the applicable labour legislation.

The Audit Committee is responsible for monitoring the implementation of the human rights policy relating to communication and investigation, grievance management and employee counselling as well as matters relating to disciplinary misconduct.

3. Harassment in the Working Environment

Working environment harassment is defined as repeated, unjustified behaviour towards a worker, or a group of workers, that endangers his/her health and safety.

Unreasonable behavior is defined as that which a worker perceives as unfavorable treatment, humiliation, undermining or threatening, considering the totality of the circumstances in his/her working environment.

Risks to health and safety include risks to the worker's mental and physical health.

Harassment can include aggressive behavior, both verbal and physical, as well as less obvious actions such as devaluing a colleague's work or social isolation in the workplace. Harassment often involves an element of improper use or abuse of power, from which victims may be unable to protect themselves. The concept of harassment can include both physical and psychological violence.

Sexual harassment is defined as the manifestation of any form of unwanted conduct of a sexual nature, with the purpose or effect of violating the dignity of a person, in particular by creating an intimidating, hostile, degrading, humiliating, humiliating or aggressive environment (Law 3896/FEK 207/8.12.2010).

4. Violence in the Workplace

According to the European Agency for Safety and Health at Work, violence at work is any incident where a person is subjected to insults, threats or assaults at work that endanger their safety, health, well-being or work performance. It covers insults, threats, physical or psychological assaults by persons inside and outside the organization against a person in the workplace. There may be a racial or sexual dimension to violence.

5. Communication with Employees and Active Engagement

The Company seeks to ensure a positive working environment that promotes internal communication through different channels and opposes the display of any kind of unprofessional behavior.

Specifically, in order to achieve two-way contact at all levels, it provides all employees with multiple communication channels, which include: the Employee Satisfaction Survey, personalized and group electronic communication via e-mail, departments' meetings, performance and skills evaluation of employees.

Further, the Company is systematically seeking new ways of communication to ensure the dissemination of information and further improve communication and contact with employees.

In particular, the Company's newly hired employees receive a copy of and are informed from the moment of their hiring about the Code of Conduct, HR Management Principles, HR Policies, among others.

The relevant information is also provided electronically by the Compliance Officer to all employees through an electronic notification.

All human resources are required to have carefully read, understand, and accept the contents of the policy and commit to informing them of any relevant changes or amendments whenever announced by the Company.

6. Transparency in Informing Stakeholders

Η Trastor επιδιώκει να διασφαλίσει συστηματική και σύμμετρη πληροφόρηση σε ενδιαφερόμενα μέρη (stakeholders) για τα θέματα πολιτικής ανθρωπίνων δικαιωμάτων και των πρωτοβουλιών που εφαρμόζει.

Ενδεικτικά, η Εταιρεία επικοινωνεί τις σχετικές ενημερώσεις μέσω του διαδικτυακού ιστότοπου της, και του λογαριασμού της στο LinkedIn.

7. Confidentiality and Privacy Principle

Trastor takes care to ensure at all times the confidentiality and privacy of the data concerning the Company's human resources.

The Company encourages named reports. Anonymous reports make the task of analytical investigation extremely difficult or even impossible, due to the difficulty of providing information from an anonymous complainant (e.g. conversation, meeting to provide clarifications during the investigation), as well as assessing the credibility of the report. Anonymous reports submitted are reviewed according to their level of substantiation and the possibility of identifying the unlawful action they describe.

The Company is committed to maintaining the anonymity of the complainant and not to take any action that may result in the disclosure of the complainant's identity. Note that the disclosure of the identity of the complainant may be required by judicial or legal proceedings as part of the investigation of the case. The anonymity of any other persons involved in the report will be preserved, subject to the above restrictions.

Personal data will be held and processed in accordance with the provisions of the applicable personal data protection legislation.

8. Monitoring and Management Systems to Ensure Human Rights

In the broader context of risk management, any risks arising from the non-implementation of relevant procedures are assessed.

Further, the Company has established monitoring systems and practices, procedures for managing conduct contrary to the Company's operating principles and values in order to identify in a timely manner any incidents of unprofessional conduct contrary to human rights principles; and to ensure that they are promptly and effectively addressed.

Unprofessional conduct is defined as any conduct that involves direct or indirect discrimination and offends the dignity of employees. In accordance with the European anti-discrimination legislation introduced in 2000, 2000/43/EK and 2000/78/EK, all direct or indirect discrimination is prohibited. Discrimination is defined as the failure to provide equal opportunities at work irrespective of sex, age, race, colour, religion, sexual orientation, physical ability. Discrimination is also defined as harassment and any other offensive action as well as an order to discriminate.

In the event that an employee believes that he/she has been subjected to any form of direct or indirect discrimination, unprofessional conduct, sexual harassment or that he/she has been wronged in the workplace, he/she should first seek to report the incident to his/her immediate supervisor and head of unit.

Cooperation between employees and supervisors should be possible in resolving most work issues and/or problems.

In cases where it is not possible to resolve the problem at the unit level, the Company has established roles that provide support and guidance in managing incidents of unprofessional conduct in a responsible and sensitive manner for the employee.

The management of any issue is managed in accordance with the established *Whistle Blowing Policy*.