

Human Rights Policy

Introduction

GLOBE WILLIAMS considers that human rights are a material sustainable development issue for the Company. The Company is committed to respecting and protecting all categories of human rights. Respect for human rights is included in the Company's Code of Conduct and is one of its fundamental responsible practices.

GLOBE WILLIAMS consistently pays attention to how its business activities can affect human rights and is not involved in activities or relationships where there are clear indications of human rights violations. Our governance, prevention and response measures place particular emphasis on the following areas of activity:

- ✓ respect for the human rights of workers and society
- ✓ avoiding human rights violations through our business relationships with clients, suppliers and associates

This Policy sets out GLOBE WILLIAMS' zero tolerance for human rights violations and is implemented both by the Company not participating in such violations and by avoiding all transactions and contacts with third parties who have created, or concerning whom there are well-founded suspicions that they could be involved in creating, conditions which could cause violations of those rights.

A key principle of the Company is to support and respect internationally proclaimed human and labour rights in line with the UN Declaration on Human Rights. The Policy relates to issues which fall within the business scope and whose consequences have been assessed by evaluating the Company's Business Sectors. The main objective of the Human Rights Policy is to contribute to achieving the Company's overall Sustainable Development strategy by linking it to procedures and policies governing its wider business activities. The policy is regularly reviewed in order to be compatible with national and international developments and may be amended whenever that is considered necessary.

Purpose of the Policy

- This Policy sets out GLOBE WILLIAMS' zero tolerance for human rights violations and is implemented both by the Company not participating (directly, passively or tacitly) in such violations and by avoiding all transactions and contacts with third parties who have created, or concerning whom there are well-founded suspicions that they could be involved in creating, conditions which could cause violations of those rights.
- Moreover, the purpose of the Policy is to increase awareness and ensure the commitment of employees, suppliers and associates of GLOBE WILLIAMS to respect and protect human rights in all sectors of its business activities, including its subsidiaries.



The Company undertakes to recognise, evaluate, prevent and mitigate the risks of human rights violations by implementing a due diligence procedure and corrective actions to address such incidents if they occur. As part of its business activities, it respects and protects the following labour and social human rights:

Occupational Health & Safety

The Company ensures that it maintains a safe working environment by adopting high health and safety standards, systematically evaluating and managing the relevant risks, and by encouraging a corporate culture which seeks to make occupational health and safety a priority. The Company is committed to maintaining a working environment based on trust, dialogue and mutual respect and protects the prosperity and work-life balance of its employees. The Company is committed to ensuring decent pay and working hours based on applicable laws and labour standards for working hours, overtime and leave.

Suitable Working Conditions

- GLOBE WILLIAMS is committed to maintaining a working environment based on trust, dialogue and mutual respect and protects the prosperity and work-life balance of its employees.
- GLOBE WILLIAMS is committed to ensuring decent pay and working hours, based on the applicable laws and industrial standards for working hours, overtime and leave, while remuneration for overtime is higher than that laid down in Greek law.

Child Labour

The Company undertakes to operate in accordance with all laws on minimum ages for the recruitment of employees. The Company is prohibited from employing minors aged under 18. The Company has adopted a zero tolerance policy for incidents and child labour conditions across its entire range of operations, including its supply chain.

Forced Labour and Human Trafficking

The Company is committed to taking all necessary measures to avoid incidents and any direct or indirect involvement in any form of forced or mandatory labour and trafficking in human beings. The Company acknowledges its responsibility to remain aware of all relevant risks within its operations and in its wider supply chain. The Company is prohibited from exploiting any person and from using all forms of forced or compulsory labour. The Company has zero tolerance for incidents and conditions which could favour any form of modern-day slavery in the context of its operations and its supply chain activities, recognising that no sector of activity can be excluded.

Equal opportunities without discrimination

The Company is committed to providing equal opportunities and prohibits discrimination and harassment. Company procedures on seeking out and recruiting staff, access to education and training, pay, evaluation of performance and termination of collaboration are free from any discrimination based on race, gender, colour, national or social origin, religion, age, disability, sexual preference and political belief.



The Company does not tolerate insulting or inappropriate conduct, unfair treatment or retaliation of any type. According to the Company's Code of Conduct and the Anti-Violence and Harassment at Work Policy, physical or verbal harassment with a sexual, racist or defamatory character is prohibited in the workplace and all work-related situations outside the workplace. In the context of gender equality, the Company undertakes to take suitable measures to eliminate all discrimination against women in the field of employment, equal pay for equal work, vocational education and training and decision-making procedures. The Company respects employee personal data (GDPR) every time it collects personal information or carries out checks in the workplace.

Disciplinary Practices

The Company is committed to treating all its people with dignity and respect. Disciplinary practices, if necessary, are always in accordance with the law and in particular with the provisions of labour law. In all events, they will be a tool to prevent and avoid unacceptable conduct by employees. The Company undertakes to investigate complaints notified to it and to act accordingly. Where disciplinary measures are required, the Company undertakes to respect the basic rights of employees against whom complaints are made, such as: a) having information about and access to details of the assertions contained in the complaint, b) responding, formulating their defence claims and raising objections without restrictions or negative repercussions, c) if they so wish, consulting third parties and/or being represented by third parties when complaints are being evaluated. The Company is committed to ensuring that its disciplinary practices are consistently and fairly applied to all staff, and personal characteristics such as gender, national origin, religion, etc. will not affect the results of the investigation of any misconduct or the extent and content of any penalty.

Product - Service Management

The Company complies with the relevant national laws, international guidelines and standards on the design, production and trade of its products and services. The Company undertakes to monitor and protect the right to health, safety and privacy of clients/consumers arising from the use or sale of its services. If training or other measures are required to safely use its products and merchandise, the Company undertakes to ensure that all necessary steps are taken to ensure that end users are aware of those requirements.

The Company:

- is committed to raising awareness among its employees by providing information and training, while also engaging in corporate activities while respecting human rights.
- undertakes to regularly evaluate the business units in its Business Sectors in relation to the impacts on human rights protection.
- undertakes to promote respect for and protection of human rights in its supply chain and to include key human rights indicators in supplier selection criteria, contractual terms and checks carried out by the purchasing and procurement departments of its Business Sectors.

Complaint mechanisms and reporting

GLOBE WILLIAMS seeks to engage in substantive stakeholder consultation as part of its human rights due diligence process and encourages all stakeholders to contact the company if they



have clear evidence of non-compliance with the relevant procedures, as part of its effort to prevent or avoid any harm to human rights or wider involvement in human rights issues. clients and the public can contact us or submit complaints to **info@globewilliams.com** which will be examined by the competent departments. Any complaints, including those relating to human rights, are initially dealt with in accordance with the whistleblowing policy

On behalf of Management