

**Policy for the prevention and combating of discrimination,
violence and harassment at work and procedure for
submission and examination of complaints**

pragma.
IOT SOLUTIONS

www.pragma-iot.com

1. PURPOSE

Pragma-IoT (hereinafter the “Company”), fully complies with the provisions of Part II of Law 4808/2021, which aim at the prevention and addressing of every form of violence and harassment, including gender-related and sexual harassment phenomena.

We are committed to the creation and maintenance of a working environment where everyone is treated with dignity and respect. All employees have the right to operate in an environment that promotes equal opportunities and prevents any form of discrimination, violence or harassment. Therefore, the Company expects from all persons associated with it to behave with professionalism and to avoid any action that may be considered offensive or abusive.

This Policy has been formulated in order to ensure that all employees enjoy a working environment free from every form of violence, discrimination, harassment or retaliation. The Company shall ensure that everyone is aware of this Policy and is informed that any complaint regarding its violation will be examined with care and impartiality.


The Company explicitly and categorically prohibits any form of violence, discrimination or harassment, regardless of whether these arise or are directly related to the workplace.

This Policy cannot be interpreted as a means of exclusion of any individual based on gender or other protected characteristic. On the contrary, it ensures that everyone is treated equally with regard to employment conditions and rights. The provisions on prevention of violence, harassment and discrimination aim to strengthen the principles of equality and fair treatment.



2. SCOPE OF APPLICATION

This Policy applies to all levels of management, the employees of the Company, candidates for recruitment, as well as persons cooperating with the Company through contracts for work, independent services or temporary employment. Additionally, it covers those employed through third-party providers, trainees, apprentices, as well as persons whose professional relationship with the Company has ended.



The Policy covers conduct originating both from internal staff and from external persons who have a professional relationship with the Company (e.g. partners, clients or suppliers).

The provisions of the Policy apply both within the physical premises of the Company and in virtual or remote working environments. Furthermore, they extend to any professional activity outside the office, such as business trips, meetings or events related to work.


3. DEFINITIONS

Discrimination

Discrimination is understood as discrimination based on gender, race, color, ethnic origin or social origin, genetic characteristics, language, religion or beliefs, political opinions, disability or health condition, age or sexual orientation. Harassment on the basis of any other protected characteristic is also strictly prohibited.

Violence and Harassment

Violence and Harassment include any behavior, act or threat that may cause or lead to physical, psychological, sexual or economic harm, whether it occurs once or repeatedly. This includes:

- **Physical violence:** Any form of physical attack or coercion.
 - **Verbal violence:** Demeaning comments, insults, threats or sarcastic remarks.
 - **Psychological violence:** Systematic devaluation, exclusion from work activities or intimidation (mobbing).
- 

- **Economic violence:** Unjust deprivation of financial resources, opportunities or benefits to which the individual is entitled.

Harassment

Harassment is considered any behavior that has the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading or offensive environment. This behavior may be verbal, written or physical and may be related to protected characteristics, such as race, gender, religion, age, sexual orientation or disability.

Indicative examples include:

- Demeaning comments, threats, negative stereotypes or intimidating actions.
- Dissemination of offensive material in the workplace, either physically or electronically (e.g. email, messages, social media).
- Physical interference or obstruction of work.
- Retaliation or intimidation against persons who report or complain about incidents of harassment.

Moral Harassment (Mobbing)

Moral Harassment (mobbing) is defined as systematic, hostile and abusive behavior that is repeatedly manifested with the aim of degrading, isolating or intimidating the victim.


Indicative forms include:

- Continuous criticism or unfair evaluation of performance.
- Marginalization from group activities or professional opportunities.
- Spreading rumors or defamatory comments.
- Assignment of inappropriate or downgraded duties with the aim of humiliation.



Gender-based harassment & Sexual harassment

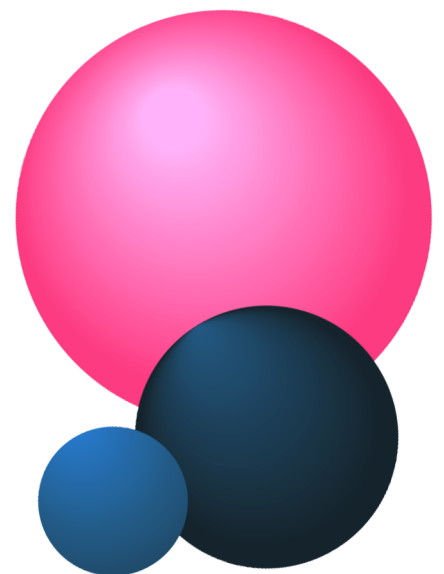
Gender-based harassment is any behavior linked to the gender of a person and has the purpose or effect of violating their dignity and creating a hostile or humiliating environment. It includes sexual harassment, which is defined as unwanted conduct of a sexual nature, such as:

- 
- Unwanted sexual proposals or comments.
 - Requests for sexual favors.
 - Verbal or physical conduct that creates a hostile or offensive working environment.

Such behaviors may include:

- Sexual jokes or insinuations.
- Comments about a person's appearance or personal life.
- Unwanted touching, hugs or other physical contact without consent.
- Display or sending of inappropriate visual or written material (e.g. images, videos, messages).

Any form of harassment is unacceptable and anyone who exercises it shall bear full responsibility for their actions. The organization is committed to investigate all complaints with absolute confidentiality and to take the necessary measures for the protection of victims.



Prevention and combating of violence and harassment

1. ASSESSMENT OF RISKS OF VIOLENCE AND HARASSMENT AT WORK.

Violence and harassment in the workplace entail serious risks both for employees and for the Company itself. The consequences for employees include, among others:

- a) Violation of human dignity and causing psychological harm.
- b) Increase of work-related stress, fear and emotional tension.
- c) Appearance of physical and psychosomatic symptoms (such as insomnia, headaches, increased blood pressure, tachycardia).

For the Company, the risks include:

- a) Disruption of smooth operation and professional relationships.
- b) Decrease in productivity and quality of work.
- c) Legal implications and financial damages.
- d) Negative publicity and damage to the Company's reputation.

The Company takes measures for the prevention, recognition and management of incidents of violence and harassment. These include awareness initiatives, clear procedures for reporting and investigating complaints, as well as full compliance with applicable legislation on health and safety at work. These actions aim at the protection of employees and the maintenance of a safe and respectful working environment. Additionally, the Company conducts regular evaluations and revisions of its policies, ensuring continuous improvement and adaptation to current needs and legislative requirements.

2. MEASURES FOR THE PREVENTION, CONTROL AND LIMITATION OF RISKS – INFORMATION & AWARENESS ACTIONS

The Company ensures a safe and supportive working environment, where relationships among employees are based on respect, cooperation and trust.

Within the framework of prevention and management of potential risks, the Company takes measures to inform and raise awareness of staff regarding issues related to violence, harassment and discrimination in the workplace.

For the promotion of these values:

- Informational material and guidelines are provided regarding the management of issues of respect and safety in the workplace.
- Open communication is encouraged as well as the reporting of any incident that violates the Company's policies.
- Meetings are organized with the aim of strengthening cooperation, preventing risks and creating an environment where all employees feel safe and respected.

Also, within the limits of its capabilities, it takes every appropriate measure for the guidance, support and smooth reintegration of victims of domestic violence, proceeding, to the extent possible, to any reasonable, case-by-case adjustment of working conditions for the protection of employment and the support of employees who are victims of domestic violence. It encourages both its employees and any third party associated with it to report any incident of discrimination, violence or harassment in the workplace that they perceive or witness.

The Company monitors and evaluates its policies on a regular basis, proceeding to any adjustments deemed necessary in order to ensure a fair and safe working environment.



3. INFORMATION AND AWARENESS ACTIONS OF STAFF REGARDING ISSUES OF VIOLENCE AND HARASSMENT.

The Company adopts a zero-tolerance stance towards violence and harassment, taking measures to inform and raise awareness among its staff:

- It provides, through this Policy, information regarding the risks of violence and harassment, the preventive and protective measures, the internal procedures and the rights provided by legislation.
- It may organize targeted meetings with staff for the discussion of relevant issues and the timely addressing of potential risks.
- It may organize training seminars with specialists or advisory service providers, depending on needs.
- It encourages the participation of its employees and executives in training and education programs for the recognition and management of incidents of violence and harassment in the workplace.

4. INFORMATION ON THE RIGHTS AND OBLIGATIONS OF EMPLOYEES AND THE COMPANY IN CASE OF INCIDENTS OF VIOLENCE AND HARASSMENT, AS WELL AS THE RELEVANT PROCEDURE

In case a person is affected by an incident of violence and harassment during access to work, during the employment relationship or even after its termination provided that it occurred during the course of that employment, they have the following rights:

- Complaint to the Human Resources department, which will handle the matter with absolute confidentiality, objectivity and particular sensitivity.
- They may submit a named or anonymous complaint to the Labour Inspectorate (SEPE – Σώμα Επιθεώρησης Εργασίας, Greece), to the Independent Department for the Monitoring of Violence and Harassment at Work (complaint hotline: 1555).

- Report to the Greek Ombudsman (Συνήγορος του Πολίτη), DETH HELEXPO S.A., Egnatia 154, 54636 Thessaloniki, Tel.: +30 2131306600, E-mail: press@synigoros.gr.
- Right to judicial recourse.
- Immediate psychological support and counselling service for women victims of gender-based violence: SOS Helpline 15900 (Γενική Γραμματεία Δημογραφικής και Οικογενειακής Πολιτικής και Ισότητας των Φύλων – Greece), <http://www.isotita.gr/thlefoniki-grammi-sos/>

In any case, when a report or complaint of such behavior arises within the Company, the affected person retains every right to appeal to any competent authority. In case violations are established with the existence of relevant evidence, the employment relationship with the perpetrator is terminated and the Company proceeds to all necessary legal actions. In any case, Pragma-IoT will make available to the competent authorities any relevant information, if requested, and will cooperate with the aim of eliminating phenomena of violence and harassment.

5. DESIGNATION OF CONTACT PERSON (“LIAISON”)

For the purposes of this Policy, the Liaison is designated as the Human Resources Director of Pragma-IoT, who is responsible for guiding and informing employees regarding the prevention and handling of violence and harassment at work. Communication takes place either verbally in person or via e-mail at: a.tsantili@pragma-iot.com

The Liaison provides support on any issue related to incidents of violence or harassment, whether there is a formal complaint or not, and acts at their discretion to inform Management. They are obliged to ensure the protection of Personal Data received in the exercise of their duties.

In case of impediment, conflict of interest or suspicion of bias or for any reason inability to handle the incident by the regular Liaison, the Deputy Liaison is designated as the Software Development Director of the Company, e-mail: kzkitsik@pragma-iot.com.


In this Policy, reference to the Liaison includes also the Deputy Liaison

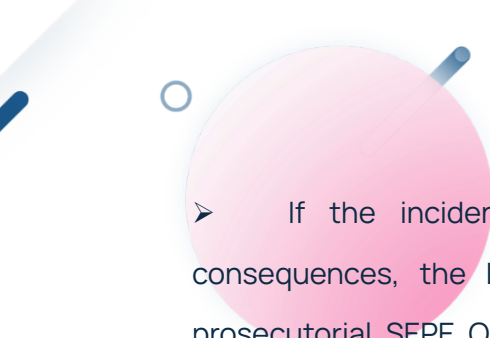


Procedure for receiving and examining complaints

1. INVESTIGATION AND EXAMINATION OF COMPLAINTS WITH IMPARTIALITY AND PROTECTION OF CONFIDENTIALITY AND PERSONAL DATA OF VICTIMS AND ACCUSED PERSONS

The Company and the Liaison commit to receive, investigate and manage immediately any complaint regarding an incident of violence or harassment with impartiality, objectivity and respect for human dignity, while ensuring confidentiality and the protection of personal data of those involved. In this context:

- Persons submitting a complaint will be informed of its receipt and the progress of its examination. Upon completion of the investigation, the Company informs the complainant of the results.
 - The Liaison, in cooperation with the legal advisor and/or other competent executives of the Company, investigates the allegations using any appropriate means, provided that this does not conflict with legislation and good morals. If deemed necessary, they inform the Company's Management (Board of Directors and/or Chief Executive Officer) regarding the complaint and the results of the investigation.
 - Where possible, the Liaison seeks an amicable resolution before escalation.
 - To ensure workplace peace and the integrity of the investigation, the Company may transfer or modify the working hours, place or method of work of the affected person or the accused until completion of the investigation.
 - During the investigation, the Liaison may access Company records, audiovisual material and other appropriate means of information collection, in accordance with the law.
 - Before taking any measure or imposing sanctions, the Liaison calls the accused to provide explanations, unless reasonably deemed unnecessary due to risk to the affected person or existence of irrefutable evidence.
- 



➤ If the incident constitutes an unlawful act with criminal or administrative consequences, the Liaison cooperates with the competent authorities (e.g. judicial, prosecutorial, SEPE, Ombudsman).

➤ The Company and the Liaison are committed to confidentiality and protection of personal data collected during the investigation.

The investigation of complaints and the issuance of decisions are governed by the following principles:

✓ **Prohibition of retaliation and further victimization of the affected person and witnesses:** All complaints, regardless of submission method, are examined in a way that ensures avoidance of retaliation. Any action leading to termination of employment or other adverse consequences against a complainant or witness, when it constitutes retaliation, is strictly prohibited and invalid.

✓ **Confidentiality:** All persons receiving complaints are obliged to handle them with absolute confidentiality.

✓ **Anonymity:** In case of anonymous complaint, the investigating body may seek communication if necessary, however if the affected person does not wish to reveal identity, this must be fully respected.

✓ **Impartiality:** The investigating body acts with impartiality and full sense of duty. If not possible, the Deputy Liaison is appointed.

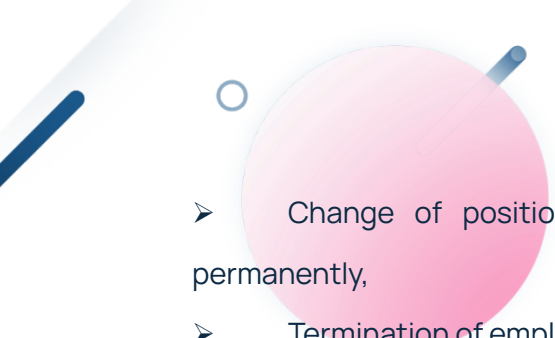
✓ **Protection of Personal Data:** Personal data of all parties are protected to the maximum extent under applicable law.

2. CONSEQUENCES IN CASE OF VIOLATIONS OF THIS POLICY.

If it is established that an employee or other person working with Pragma-IoT has violated the prohibition of violence and harassment, the Company takes appropriate, necessary and proportionate measures to prevent recurrence. **Such measures may include:**

➤ Recommendation for compliance,



- 
- Change of position, working hours, place or method of work, temporarily or permanently,
 - Termination of employment or cooperation.

Furthermore, if a complaint is found to have been submitted maliciously, Pragma-IoT reserves the right to take any lawful action against the complainant.

3. COOPERATION AND PROVISION OF INFORMATION TO COMPETENT AUTHORITIES, IF REQUESTED

The Company, the Liaison and any competent person cooperate fully with public, administrative or judicial authorities, if requested, either ex officio or upon request of the affected person. Necessary data and information are provided, ensuring full support and access. All collected data are kept in a special file in compliance with personal data protection legislation.

4. FINAL PROVISIONS

This Policy is communicated to all employees through appropriate means, such as the Company's wiki and Teams platform, to which all employees have access. The Company reserves the right to update this Policy at its discretion, in accordance with needs and developments.

