



# Ethics & Compliance Human Rights Policy

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<b>Classification</b>	Public
<b>Owner</b>	Head of Ethics & Compliance  The Policy Owner is responsible for periodically reviewing and updating this Policy so as to reflect regulatory, best practice and business developments.
<b>Approver</b>	



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## **Applicability & Consequences**

This Policy applies to the Group and to Group Personnel. Group Personnel agree to uphold the Group's commitment to do what is right and to follow this Policy and the Group Code of Conduct. Group Personnel who fail to uphold this commitment put themselves, their colleagues, and the Group at risk of fines, penalties, reputational damage and personally may be subject to disciplinary action, up to and including, loss of employment. The Group reserves the right, at its sole discretion, to disclose information about violations of law to relevant authorities. Any Group Personnel who have violated applicable laws may be personally liable for penalties or fines or may be subject to imprisonment.

A Group Asset may establish standards that are stricter than this Policy. Any exceptions to or deviations from this Policy must be submitted to the Ethics & Compliance Office.

## **Your Responsibilities:**

- Follow applicable laws and regulations
- Understand and comply with the requirements of this Policy, the Group Code of Conduct, other Group Policies, and any Division/Sector or Asset policies or procedures in relation to this Policy
- Demonstrate ethics, integrity, and accountability at all times and expect the same from others
- Complete assigned training related to this Policy
- Uphold our commitment to always do what is right
- Leadership will provide appropriate resources and support to ensure the successful implementation of this Policy

## **Questions & Reporting Violations:**

Refer in good faith any questions, concerns, or any known or suspected violations of this Policy to your line manager or other internal management or to the Ethics & Compliance Office (please see Helpine Channels on Appendix).

Retaliation for good-faith reporting is not tolerated. Group Personnel who engage in retaliatory conduct are subject to disciplinary action.



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## **Group Human Rights Policy Statement**

In [Avramar] Group all human rights are protected and respected. We believe that we have the responsibility to ensure that there is no human rights violation or disrespect in the way we conduct business or treat our employees or others.

### **Our Policy**

[Avramar] Group's Human Rights policy is governed by the international principles of the United Nations Global Compact of which it has been a member since 2009 and the International Labor Organization.

[Avramar] Group's Code of Conduct as well as our Internal Labor Code explicitly provides for the protection of Human Rights and prohibits any kind of abuse thereof and is available to all employees.

The [Avramar] Group undertakes and adopts the principles of the following Human Rights:

1. Prohibits any form of discrimination in the workplace regarding gender, religion, age, abilities and promotes equal opportunities
2. Protects the right of freedom of association and the right to collective bargaining and encourages the open dialogue and mutual trust with the legally elected representatives of the workers.
3. Supports the effective abolition of child labor and maintains the age limit in accordance with Greek labor legislation
4. Supports the elimination of any form of forced or compulsory work
5. Committed to respect all employees without using any form of psychological, physical violence or the threat of such behavior
6. Collaborates and creates value in the local communities where it operates. Committed to create economic opportunities and promotes a climate of mutual sharing and creative contribution.

[Avramar] Group is committed to provide to all its employees:

- structured, transparent, and effective selective processes, valuing local hiring
- decent working conditions
- a clear labor conflict resolution policy in place for the presentation, treatment, and resolution of worker grievances in a confidential manner
- that no abusive disciplinary actions are taking place including threatening, humiliating or punishing disciplinary practices.
- to promote educational actions that enable the professional and personal growth of employees.
- to maintain a safe and healthy work environment.



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- to respect and value diversity, promote inclusion, and not tolerate discrimination or harassment of any nature, including moral or sexual, in accordance with applicable local laws.
- to respect and practice the freedom of association and collective bargaining in all areas, in accordance with applicable local laws.
- to provide training to help promote the respect of human rights to ensure that all employees are aware of and enforce its principles, as employees are both the subject and strategic agent of human rights.

### Policy Requirements

[Avramar] Group is committed to enhance a working environment free of discrimination and harassment, where all individuals are treated with respect and dignity and have equal opportunities.

The purpose of this policy is:

- to identify the types of behavior prohibited by this policy
- to provide procedures to follow when complaints of discrimination or harassment made by partners or employees of [Avramar] Group arise
- to ensure that all partners and employees of [Avramar] Group are aware that harassment and discrimination are unacceptable practices incompatible with our company standards, and a violation of the law

### PROHIBITED CONDUCT:

#### Discrimination

The [Avramar] Group upholds and supports the right to equal treatment without discrimination or harassment. This Policy prohibits discrimination or harassment based on the following grounds, and any combination of these grounds:

- Age
- Creed (includes religion)
- Sex (including pregnancy and breastfeeding)
- Gender Identity\* and Gender Expression\*
- Sexual Orientation\*
- Family status (such as a parent-child relationship)
- Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship)
- Disability (including mental, physical, developmental, or learning disabilities)
- Race
- Ancestry
- Place of origin
- Ethnic origin
- Citizenship
- Color



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### Harassment

Workplace harassment will not be tolerated from any person in the workplace (including fellow employees or partners, clients, other employers, supervisors, and members of the public).

Anyone at [Avramar] Group found to have engaged in workplace harassment may be subject to disciplinary action, up to and including termination.

### **Business Partners & Suppliers Network**

We have a large and diverse extended Business Partner & Suppliers Network and we recognize the critical role our suppliers play in helping us to work responsibly and sustainably. Our Suppliers Code of Conduct sets out our expectations with regards to the respect for the human rights, including labor rights, of the workers in our extended supply chain.

We will only work with suppliers who implement our Suppliers Code of Conduct. They must agree to ensure transparency, to remedy any shortcomings, and to drive continuous improvement.

In short Supplier's obligations in relation to labor compliance and based on international human rights standards including fundamental principles and rights at work must retain from:

#### **a. Forced labour**

Supplier shall not use any form of forced, bonded, slavery or human trafficking.

As part of hiring process, workers must be provided with a written employment contract that contains a description of employment. All work shall be voluntary, and employees shall be free to leave work after reasonable notice period expires or terminate their employment.

#### **b. Young workers**

Child labor is strictly prohibited. No person shall be employed who is below the minimum legal age of employment. The minimum age of employment refers to any person under the age of 15 or under the age for completing compulsory education in countries, whichever is higher. Children under the age of 18 shall not perform work that is hazardous for their health and safety or inconsistent with the child's personal development.

#### **c. Working hours**

Supplier shall ensure working hours of supplier's employees do not exceed the maximum set by applicable local law. A workweek does not exceed 60 hours per week including overtime. Workers shall be allowed at least one day off every seven days. Supplier shall follow all applicable laws with respect to working hours and all overtime should be voluntary.

#### **d. Wages**

Supplier should ensure its employees paid with the applicable wage laws, including those relating to minimum wages, overtime hours and legally agreed benefits.

Workers shall be provided with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Supplier shall not use deductions from wages as a disciplinary measure.

#### **e. Disciplinary practices**

There is no inhumane treatment, including mental, physical, or verbal abuse of workers. Disciplinary practices shall be communicated to workers.

#### **f. Discrimination**

Supplier shall not support any form of discrimination in hiring, employment terms, race, color, age, gender identification, sexual orientation, pregnancy, nationality, disability, religion, political affiliation, social or marital status and union membership.



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Suppliers shall endorse any form of discrimination at any stage of employment from their recruitment, interview, and assessment.

### **g. Freedom of Association**

Supplier shall respect the right of all workers to join trade unions and the rights of employees to bargain collectively to the extent permitted by applicable law.

Workers and their representatives shall be able to openly communicate and share ideas and concerns with management for the resolution of any issues.

## **Grievance/Complaint Policy**

Employees may file grievances for any of the following reasons (the following list is not exhaustive):

- **Workplace harassment**
- **Health and safety**
- **Supervisor behavior**
- **Employment conditions**

When an official grievance is filed, the company is obliged to:

- **follow the standard formal grievance procedure**
- **Communicate the procedure**
- **Investigate all grievances promptly**
- **Treat all employees who file grievances equally**
- **Preserve confidentiality at any stage of the process**
- **Resolve all grievances when possible**

## **Handling and Investigating Grievances/Complaints**

Grievances/Complaints that have been reported will be promptly assessed on a preliminary basis by the Ethics & Compliance Office to determine the need for, and appropriate course of, Investigation. Relevant Leadership will be notified at the appropriate time where a Grievance/Complaint is raised against a person in that Leadership's Division/Sector or Asset. In situations where Leadership is the direct subject of a Complaint, the Leadership's supervisor will be notified as appropriate.

A designated member(s) of Human Capital will be notified of, and may be delegated responsibility for investigating, any Grievances/Complaints that principally comprise personnel issues, performance or performance evaluation matters, or employee relations.

### **Investigation Process**

The Ethics & Compliance Office will promptly assign an appropriate Investigator to each Grievance/Complaint where it has been determined that an Investigation is required. Investigations are to be conducted where warranted, irrespective of an individual's position or tenure within the Group. All Investigations will be completed as soon as reasonably practicable, while maintaining a thorough and fair review. Investigators will strive to ensure that business operations are not disrupted by the Investigation.

An Investigator will interview the reporting individual, if known, to discuss the Grievance/Complaint, gather information, and clarify any issues to help formulate the scope of the Investigation. The person who is the subject of the Investigation will be notified in a timely manner, appropriate to the type of



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Complaint raised and legal requirements, about the Investigation and may be involved in the Investigation, as deemed necessary and appropriate.

Upon completion of the Investigation, the Investigator will prepare a closure report and/or closure plan. The reporting individual will be informed of the closure of the Complaint Feedback entailing the actions taken.

Only in the case that there are Avramarly discovered facts or information might an appeal of an Investigation be considered. An appeal will not be considered simply because a party disagrees with or dislikes the outcome of an Investigation. Only the Policy Owner has discretion to accept an appeal. Accepted appeals are reviewed by the Policy Owner who will make a final determination of the appeal. In appeals that pertain to the Policy Owner or senior Leadership, the appeal is reviewed by the ARCC.

### **Remedy**

We pay attention on the provision of effective remedy wherever human rights impacts occur through company-based behavior or tactics. We continue to train our employees and workers on human rights, including labor rights, encouraging them to speak up, without retribution, about any concerns they may have, including through our helpline channels. We are committed to continue increasing the capacity of our management to effectively identify and respond to concerns. We also promote the provision of effective grievance mechanisms by our suppliers.



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## Definitions

Term	Definition
<b>Discrimination</b>	Refers to any form of unequal treatment based on prohibited conduct, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory, or it may involve rules, practices or procedures that appear neutral, but have the effect of disadvantaging certain groups of people.
<b>Harassment</b>	Engaging in a course of vexatious comment or conduct that is known, or ought reasonably to be known, to be unwelcome. It can involve words or actions that are known or should be known to be offensive, embarrassing, humiliating, demeaning, or unwelcome.
<b>Grievance</b>	any complaint, problem or concern of an employee regarding their workplace, job or coworker relationships
<b>Ethics &amp; Compliance Office</b>	The Ethics & Compliance Office or relevant Asset ethics & compliance function
<b>Group Policy(ies)</b>	Any policy that applies to the Group. Group Policies do not include policies that only apply to a limited set of Group Personnel, for example, a policy that only applies to a specific Division/Sector or Asset within the Group
<b>Investigation</b>	The review and analysis of the factual, legal, and ethical bases of a Concern, which may include interviews, review of documents and data, site visits, or receipt of advice from external advisors
<b>Investigation Plan</b>	The investigation strategy for reviewing a Concern, which usually enumerates the types of documents or information to be requested and reviewed, the persons to be interviewed, and an outline of questions to ask. Investigation Plans may vary in format, from a detailed formal document to a verbally communicated plan, depending on the nature, complexity, and financial or legal risk at issue
<b>Investigator</b>	Any person designated by the Ethics & Compliance Office to coordinate, supervise, and conduct the Investigation of a particular Concern
<b>Leadership</b>	The Chief Executive Officer or equivalent of the Group, a Sector or Division head, or, in each case, a nominated representative
<b>Group</b>	Avramar Seafood S.L. (); any entity, operation, or investment controlled by; and/or any entity, operation, or investment that adopts the Group Code of Conduct
<b>Group Personnel</b>	All individuals who work directly for or represent the Group, including directors, employees, consultants, and long-term contractors of the Group





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APPENDIX

**Ethics & Compliance Contact Information**

Telephone Number : +30 2103724940

E-mail: [ethics@avramar.eu](mailto:ethics@avramar.eu)

**Ethics & Compliance Helpline Channels**

Call : 0030 2102202112

Go to : <http://speakup.avramar-group.grantthornton.gr>

Send an email to : [speakup.avramar-group@gr.gt.com](mailto:speakup.avramar-group@gr.gt.com)