

POLICY ON THE IMPLEMENTATION OF Law No. 4808/2021 ON VIOLENCE AND HARASSMENT

1. POLICY STATEMENT

Go Shipping is committed to providing a safe environment for all its employees, free from any form of workplace violence or harassment, including gender-based harassment or sexual harassment, and complies with all measures and obligations regarding the implementation of the provisions of Law 4808/2021. Go Shipping will enforce a zero-tolerance policy toward any form of violence or harassment in the workplace, will treat all incidents seriously, and will immediately investigate relevant complaints. Any act of violence or harassment at work is strictly prohibited.

The term “violence and harassment” in the workplace refers to unacceptable acts, forms of behavior, and practices—or threats thereof—whether occurring on a single occasion or repeatedly, which are intended to, result in, or are likely to result in physical, psychological, sexual, or economic harm, and includes gender-based violence and harassment. The term “gender-based violence and harassment” means violence and harassment that targets individuals because of their gender or disproportionately affects individuals of a specific gender and includes sexual harassment.

This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the implementing regulations thereof and applies to the persons referred to in paragraph 1 of Article 3 of Law 4808/2021.

2. PREVENTING AND COMBATING VIOLENCE AND HARASSMENT IN THE WORKPLACE

I. Assessment of the risks of violence and harassment in the workplace, which may be caused by colleagues, supervisors, external partners, customers, or visitors:

- Risk of an attack resulting in physical, sexual, or psychological harm.

- Attempted injury to a person, resulting in physical harm.
- Harassment or intimidation involving the abuse of physical and psychological power.
- Unwanted conduct—verbal, nonverbal, visual, psychological, or physical—based on age, disability, health status, gender, sexual orientation, race, color, language, religion, or other status that negatively affects the dignity of men and women at work.
- Sexual harassment—unwanted conduct that could be perceived by the victim as humiliating, threatening, or offensive.
- Psychological harassment (bullying), which consists of malicious, cruel, or vindictive attempts to humiliate or undermine an individual.

II. Employees have the right and the obligation to report any action or situation that violates this policy. Department heads are required to take all appropriate measures to prevent, monitor, mitigate, and address risks of violence and harassment in the workplace, as well as to monitor such incidents or forms of behavior.

III. Anyone, including Go Shipping employees, customers, temporary workers, contractors, or visitors, who harasses another person will be subject to disciplinary action in accordance with this internal policy.

IV. Any act or conduct by an employee that violates this Policy is considered a disciplinary offense and will be punished according to its severity.

V. Go Shipping undertakes to regularly inform and raise awareness among employees regarding the content of this policy, the complaint management process, as well as their resulting rights and obligations. This will be achieved through the regular organization of informational meetings at the department level, or workshops involving the entire staff.

VI. Go Shipping is obligated to ensure job protection and support for employees who are victims of domestic violence. To this end, appropriate measures will be taken on a case-by-case basis, and accommodation will be provided to employees.

3. DEFINITION OF A REFERENCE PERSON

Go Shipping has designated the Management Assistant as the designated contact person (“Liaison”), responsible for guiding and informing employees on the

prevention and handling of violence and harassment in the workplace. Employees may contact this person regarding any issue related to the implementation of this policy.

4. PROCEDURE FOR SUBMITTING AND INVESTIGATING COMPLAINTS REGARDING INCIDENTS OF VIOLENCE AND HARASSMENT IN THE WORKPLACE

Under the law, the rights of employees who may be subjected to violence or harassment are: 1) the right to judicial protection, 2) the right to file a request for labor dispute proceedings with the Labor Inspectorate, within the scope of its statutory authority, 3) filing a complaint with the Ombudsman, within the scope of his statutory powers, and 4) filing a complaint within the company in accordance with the following provisions.

1) All reports of violence or harassment are taken seriously and handled with respect and confidentiality. No one will be placed at a disadvantage for filing such a complaint, and any form of retaliation against the complainant is prohibited. All parties involved in the complaint review process must maintain strict confidentiality and safeguard the personal data of victims and those accused.

2) Anyone who experiences an act or behavior of violence or harassment must file a report, either with the “Association” or with their department head, at their discretion.

Reports may be submitted confidentially, in writing, or via email. All reports are treated with respect, confidentiality, and without fear of retaliation against anyone reporting an incident of harassment or such behavior.

Go Shipping takes all necessary measures to maintain confidentiality and protect the personal data of the individual and the information they have submitted, disclosing their identity only where required by applicable law or when disclosure is unavoidable for the conduct of an effective investigation and the taking of appropriate measures. Furthermore, Go Shipping is committed to cooperating and providing relevant information to any competent public, administrative, or judicial authority, upon request, during the investigation of incidents of violence and harassment.

3) All reports will be investigated in a timely, thorough, and impartial manner, and those who have filed reports will be notified of the receipt of their report and the progress of its investigation.

Upon submission of each report and in cases involving incidents of violence or harassment, depending on the nature and severity of the case, the recipient of the report gathers further information and, where appropriate, discusses the facts with the person involved to clarify the situation. Subsequently, in collaboration with the Human Resources Manager and with the assistance of the Legal Department, an assessment is made as to whether the matter is substantial, as well as the potential impact on the Group's operations.

In any case, Go Shipping ensures that the final decision is based on transparent and impartial evidence.

4) Go Shipping reserves the right to reassign employees or modify their work schedules pending the outcome of the investigation, in accordance with applicable law. During this period, partial or full access to buildings and/or facilities may not be permitted. If the incident of discriminatory treatment, violence, harassment, or retaliation is confirmed following the investigation, Go Shipping will take appropriate corrective, disciplinary, or other actions against the offender, including but not limited to: (a) disciplinary sanctions, (b) change of position, schedule, location, or manner of work, (c) termination of the employment contract or collaboration agreement, (d) legal action. In any case, the offender may also be subject to criminal or civil liability, in accordance with applicable law.

This Policy applies in conjunction with applicable general legislation regarding the protection of employees' privacy and does not affect their legal rights under civil and criminal law. Furthermore, in addition to judicial protection, they have the right to appeal to the Labor Inspectorate and the Ombudsman, as the body responsible for promoting and overseeing the principle of equal treatment.

Date:

Name and signature of the Chief Executive Officer: