



HUMAN RIGHTS
POLICY

Contents

1.	Introduction	3
2.	Scope of application	3
3.	Purpose	4
4.	International Standards and Guidelines	4
5.	Legislation	5
6.	Human Rights Fields	5
7.	Administration	6
8.	United Nations Guiding Principles on Business and Human Rights: Implementation of the UN Framework “Protection, Respect and Remedy”	7
9.	Staff training - Awareness raising	8

Review History

Effective date	Revision No.	Conducted by
20/06/2021	1	Compliance Department

1. Introduction

Respect for Human Rights is one of the fundamental principles of Barba Stathis, as reflected in the current Code of Conduct and the Supplier Code of Conduct. The company is committed to protecting and promoting respect for human rights across its operations.

This policy seeks to further inform and ensure respect for Human Rights across the company's operations, and sets the framework for the full implementation of respect and protection of Human Rights, both in the company's environment and in areas impacted by it.

1.1 Roles and Responsibilities of Persons and Departments

Compliance Directorate

- Provides advice where the need for interpretation arises in matters relating to this policy.
- Receives incident reports.
- Is responsible for training staff on Human Rights issues.
- Prepares an annual report on the impact of this Policy.

Legal Services Directorate

- Provides advice on issues related to Human Rights.
- Informs management and takes legal action if a violation is detected.

Internal Audit Directorate

- Handles confidential reports from employees and third parties on human rights issues.
- Carries out checks to prevent and control incidents.

2. Scope of application

The principles of this Policy are expected to be respected and applied by Barba Stathis' associates and business partners, including its contractors, suppliers, customers and all its business partners.

All contractors and suppliers of Barba Stathis are aware of this policy through the Supplier Code of Conduct, which they receive from the Procurement Directorate.

Other business partners are informed through the Code of Conduct posted on the corporate site of Barba Stathis at www.barbastathis.com and/or the cooperation agreements.

Issues related to the respect of Human Rights can arise in any interpersonal contact as a manager, supervisor, colleague or even as a business partner. Therefore, all employees of Barba Stathis must read and understand the Policy in order to ensure that they act in accordance with it.

2.1 Approvals - Policy Monitoring Mechanism

This policy is approved by Senior Management.

Management takes into account all significant changes in the organization, legislation or the business environment and establishes measurable indicators and targets. It reviews the objectives, policy and the achievement of these on an annual basis and additionally as and when required and deemed necessary in order to continuously improve the company's performance.

The Compliance Directorate is responsible for the monitoring and control of this policy and any revision thereof.

The policy has an immediate and universal effect.

3. Purpose

Respect for Human Rights is one of the fundamental principles of Barba Stathis, as reflected in the current Vivartia Code of Conduct and the Supplier Code of Conduct. The company is committed to protecting and promoting respect for human rights across its operations.

- 3.1** The Human Rights Policy seeks to raise awareness among stakeholders and ensure respect for Human Rights throughout the company's operations.

4. International Standards and Guidelines

Barba Stathis has zero tolerance for cases of human rights abuses. The Human Rights Policy includes a commitment to uphold the following internationally recognized standards:

- The United Nations Universal Declaration of Human Rights.
- The Basic Conventions of the International Labour Organization (ILO).
- The Principles of the UN Global Compact.
- The Global Sustainable Development Goals (Agenda 2030).
- The United Nations Guiding Principles on Business and Human Rights.
- The Organization for Economic Co-operation and Development (OECD) Guidelines.
- The United Nations Convention on the Elimination of All Forms of Discrimination against Women (Article 11 - scope of employment).

5. Legislation

Barba Stathis is committed to full compliance with applicable national and EU law.

6. Human Rights Fields

6.1 Freedom of Thought, Opinion and Expression

The company is a strong advocate of open, honest and fact-based communication within the organization, as well as dialogue with external stakeholders. It creates a working environment in which employees express their opinions freely, without fear of reprisal. It takes appropriate steps to facilitate officials and external stakeholders to raise concerns and to ensure that these concerns are addressed in a respectful and fair manner.

6.2 Health and Safety

The company considers the Health and Safety of its employees as one of its most important values and adopts an employment environment aimed at preventing accidents by adopting relevant risk management standards, health and safety standards, as well as systematic assessment of potential risks, in order to make health and safety a key priority.

In order to achieve this objective, the company has formulated its Health and Safety Policy, with a view to preventing accidents and occupational diseases, one of the greatest challenges faced in the industry.

6.3 Child labor and working conditions

The company is committed to fully harmonize its operations in accordance with the current legislation on minimum age limits for hiring employees in the regions where it operates. For this reason, the company is committed not to employ minors and to employ staff who are at least 18 years of age.

In addition, the company is fully aligned with the 10th Principle of the United Nations Global Compact, where it is committed to zero tolerance of child labor incidents and conditions in its supply chain and across its operations.

The company fully complies with the applicable law, to which it strictly adheres.

6.4 Forced Labor and Human Trafficking

The company is committed to taking all necessary measures to avoid participating in any form of forced or compulsory labor and human trafficking.

It is also committed to preventing any relevant risk that may occur during its business activities, and across its entire supply chain.

Based on the Company's Code of Conduct, the exploitation of any person and the use of all forms of forced or compulsory labor is strictly prohibited. The measure is universal and applies to all of the Company's activities without exception.

6.5 Freedom of Association

The company is committed to fully respecting the fundamental right to freedom of association and the right to collective bargaining, in accordance with national and EU law, without fear of retaliation or harassment.

The company seeks to engage in constructive dialogue with the representatives of the Employees' Union and its employees.

6.6 Equal Opportunities, No Discrimination

The company is committed to fully respecting people's diversity and is committed to providing equal opportunities and zero tolerance for any form of discrimination or harassment.

The company does not discriminate on the basis of race, sex, color, national or social origin, religion, age, disability, sexual preference and political convictions in its procedures and policies governing recruitment, remuneration, as well as performance evaluation and termination methods.

To this end, the Policy on Diversity, Equality, Inclusion has been developed.

7. Administration

7.1 Risk Assessment

Management is responsible for identifying and prioritizing the broader areas in each company activity where the risk of human rights violations may be greatest.

The assessment of risks relating to the protection of Human Rights differs from the assessment of risks in the commercial, technical and financial sectors, as it is not limited to assessing their impact on the company, but also on the rights of third parties.

The assessment must be carried out in all areas of activity and is part of the valuation process in any merger, acquisition or material operational changes. In addition, as conditions change frequently, it is necessary to carry out appropriate periodic checks on a case-by-case basis. Remedial or corrective actions, where foreseen, should be documented and monitored.

7.2 Surveillance and Monitoring

The Internal Audit Directorate should monitor and study the effectiveness and implementation of this Policy.

Review of this policy is the responsibility of the Compliance Directorate.

7.3 Reporting

If you believe or suspect that a human rights violation has occurred, is occurring or is about to occur, you must report the incident immediately:

- to your immediate supervisor; and/or
- the Legal Directorate; and/or
- the Compliance Directorate

Reports are handled with transparency, confidentiality and respect for Human Rights.

If you have questions or need clarification regarding the Policy, please contact the Compliance Directorate.

7.4 Violations

Any employee who violates this Policy is subject to disciplinary and legal sanctions, including termination of his or her employment contract, in accordance with applicable laws and regulations.

8. United Nations Guiding Principles on Business and Human Rights: Implementation of the UN Framework “Protection, Respect and Remedy”

Protection: the duty of the state to protect citizens from human rights violations by third parties, including corporations, through the adoption of appropriate policies, regulatory frameworks and jurisprudence.

Respect: the corporate responsibility to respect Human Rights, in the sense that businesses must avoid violating the Human Rights of others and remedy the adverse consequences of their actions.

Remedy: the need for individuals who suffer a violation of their human rights by a business to have effective access to redress mechanisms, either through judicial or extra-judicial means.

9. Staff training - Awareness raising

Barba Stathis ensures the implementation of the policy and the integration of Human Rights principles in the culture of the organization through continuous actions and briefings. It raises awareness among its people and expects their active participation in the implementation of the Present Policy.

In the context of continuous training, teams are trained by staff level per thematic module at regular intervals.

All new recruits are trained in all the basic procedures of their area of responsibility and are made aware of the content of the policies and the Code of Conduct.

The basic principles of the policy are fully incorporated into the company's procedures, which are communicated in detail to all new recruits.

There is an open line of communication between employees and the Compliance Directorate.

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