



Human Rights Policy

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	Legal Services Department		
	Department of Sustainable & Environmental Strategy		

1. Introduction

This Policy reflects the commitment of Thessaloniki Port Authority S.A. (hereinafter “the Company”) to the protection and promotion of human rights, which are a fundamental parameter of Sustainable Development for the Company in all its activities. The Human Rights Policy of the Company is closely linked with its sustainability policy, recognizing that achieving sustainable development requires respect for and promotion of human rights at all levels of activity.

The Company acknowledges that respecting and safeguarding human rights are fundamental to its ethical and responsible operation, directly aligned with the values and principles outlined in the Company’s Code of Ethics and Conduct. The Company integrates sustainability principles into its practices, ensuring that the environmental, social, and economic aspects of its operation are consistent with the protection of human rights.

2. Vision and Values

Vision: Thessaloniki Port Authority S.A. is a responsible and pioneering company, placing respect for and safeguarding of human rights at the core of its strategy, creating a positive impact on people, communities, and society as a whole.

Mission: Ensuring compliance with applicable legislation, international regulations, international human rights standards, and relevant guidelines for the protection of human rights. At the same time, promoting the well-being and dignity of all individuals affected by the activities of Thessaloniki Port Authority S.A., combating any form of human rights violations, and raising awareness among employees, customers, suppliers, partners, and all stakeholders on respect and protection of human rights.

3. Scope of Application

This policy binds:

- a. Members of the Company’s Board of Directors
- b. Senior management executives
- c. Employees under any form of employment contract
- d. The Company’s partners (contractors, suppliers, service providers, consultants, customers, users, and other business associates)

4. Principles and Objectives

The Company adopts the following fundamental principles, which guide its operations and ensure respect for and protection of human rights in all its activities:

- **Respect for Legality:** Compliance with national and international legislation, internationally recognized standards, and guidelines for the protection of human rights.
- **Promotion of Equality and Non-Discrimination:** Ensuring equal opportunities without discrimination on the grounds of age, race, gender, color, nationality, religion, health, sexual orientation, political or ideological beliefs, or other characteristics.
- **Protection of Employees:** Safeguarding employees' rights by creating a work environment that promotes dignity, safety, and respect.
- **Awareness and Training:** Providing training and awareness programs on human rights protection.
- **Transparency and Accountability:** Applying transparent processes and practices that enhance accountability for the prevention, identification, and management of human rights violations.
- **Diversity and Inclusion:** Implementing equality and inclusion policies aimed at strengthening diversity and equality in the workplace and fostering a culture of open communication and acceptance of different views.

The protection and promotion of human rights constitute a fundamental priority and core commitment of the Company. The goal is to create an environment where all employees feel accepted, respected, and protected, reinforcing trust, fair treatment, and equal participation.

Through the implementation of this Policy, the Company aims to:

- **Attract and Retain Talent:** Implement strategies to attract and retain talented professionals from diverse backgrounds, enhancing competitiveness and innovation.
- **Create a Supportive Work Environment:** Strengthen job satisfaction and employees' well-being by cultivating a positive and safe workplace that promotes productivity and commitment.

The success of this Policy requires the commitment and cooperation of all members of the Company. We are committed to continuing to invest in our people, recognizing that they are our most valuable asset and the key to achieving our strategic goals.

5. Implementation Practices

The Implementation Practices of this Policy are integrated into the Company's business processes, with the aim of systematically preventing, identifying, and managing issues related to human rights.

5.1 Compliance with Internationally Recognized Standards

The Company ensures that all its activities comply with internationally recognized human rights standards, guidelines, and directives, including:

- The Universal Declaration of Human Rights (United Nations).
- The ILO Declaration on Fundamental Principles and Rights at Work.
- The ILO Core Conventions.
- The International Covenant on Civil and Political Rights (ICCPR).
- The International Covenant on Economic, Social and Cultural Rights (ICESCR).
- The Charter of Fundamental Rights of the European Union.
- The UN Global Compact Principles.
- The UN Sustainable Development Goals.
- The UN Guiding Principles on Business and Human Rights.
- The OECD Guidelines for Multinational Enterprises.
- The UN Convention on the Elimination of All Forms of Discrimination Against Women (Article 11 – Employment).
- The European Convention on Human Rights.
- **National Legislation:** Compliance with the Greek Constitution, labor law, anti-discrimination legislation (indicatively Laws 3896/2010, 4443/2016, 4808/2021, 3850/2010), data protection regulations (Law 4624/2019 & GDPR), and union rights legislation (Law 1264/1982).

5.2 Integration into Business Activities

5.2.1 The Company develops and implements policies and procedures related to human rights that promote:

- Equality, non-discrimination, and inclusion of all individuals regardless of gender, age, nationality, religion, or other characteristics.
- Combating violence and harassment at work.
- Diversity, through hiring and promotion of individuals from different backgrounds.

5.2.2 The Company identifies, records, assesses, monitors, and regularly manages risks with potential human rights impacts through its Internal Control System.

- **Regular Audits:** Conduct of regular audits to assess compliance with Company policies and procedures.
- **Whistleblowing:** Anonymous reporting channels for violations or irregularities, provided information is submitted in good faith.

- **Compliance Reports:** Periodic compliance reports including human rights issues.
- **Corrective Actions:** Implementation of corrective measures to address identified issues.

5.2.3 The Company provides training programs on equality and non-discrimination, while promoting diversity and inclusion as part of its annual training plan.

5.2.4 The Company conducts regular Surveys and assessments to identify and address human rights risks in its activities. Human rights criteria are incorporated in materiality assessments and supplier evaluations.

5.2.5 The Company has adopted a Code of Ethics and developed mechanisms for complaint assessment, investigation, and management, ensuring the protection of all stakeholders' rights.

5.2.6 The Company operates with full transparency and strengthens accountability at all levels of its activity.

- **Transparent Procedures:** Establishment of responsible and trustworthy processes.
- **Transparency in Decision-Making:** Ensuring transparency in decisions to build employee trust.
- **Open Communication:** Encouraging open communication between employees and management.
- **Employee Satisfaction Surveys:** Conducting surveys to understand employee needs and expectations.
- **Fair Recruitment and Promotion:** Clear criteria ensuring meritocracy and objectivity.

6. Company Commitments

Workers' Rights

Thessaloniki Port Authority S.A. ensures the protection of its employees' rights in all aspects of their working life.

Family Life

The Company respects and supports the right of its employees to maternity and family life. At the same time, it seeks to improve the balance between professional and family life by providing support to its employees through social welfare benefits, depending on local conditions and expectations.

Child Labor

The Company prohibits child labor in its activities and throughout its supply chain. It offers the opportunity to young individuals over 18 years of age to participate in apprenticeship programs, internships, and gain work experience.

Slavery and Forced Labor

The use of any form of forced or compulsory labor is prohibited, including labor under loan agreements, corporal punishment, psychological or physical coercion, and sexual harassment, as well as sexual and verbal abuse.

Health and Safety at Work

A primary priority of the Company is the creation, maintenance, improvement, and safeguarding of health and safety at work, as well as the establishment and preservation of a healthy and safe working environment.

It also ensures the provision of safe and hygienic working conditions to prevent occupational accidents and diseases, along with the continuous improvement of the effectiveness of the Occupational Health and Safety Management System.

Appropriate Working Conditions

The Company strives for a fair, open, supportive, and pleasant working environment that continuously fosters the positive promotion of corporate culture, aiming at development and creativity.

Equal Opportunities Without Discrimination

The Company recruits, evaluates, remunerates, and manages its employees without discrimination based on gender, race or ethnicity, nationality, religion or other beliefs, age, family status, special abilities, sexual orientation, or political beliefs, encouraging diversity at all levels in the workplace.

Privacy Protection

The Company takes all appropriate measures to ensure the confidentiality, security, and protection of employees' personal data.

Right to Trade Union Freedom

The Company maintains open and constructive dialogue with its employees and respects their rights of association, organization, and collective bargaining, in accordance with the applicable legislative framework and regulations, for their mutual benefit.

Development Opportunities

The Company implements training programs to enhance employees' skills and capabilities and provides opportunities for growth and career advancement to all employees who demonstrate high performance and commitment.

Violence and Harassment

The Company complies with all measures and obligations related to the prevention and management of all forms of violence and harassment, including gender-based violence and sexual harassment, and handles internal complaints regarding incidents of violence and harassment.

7. Approval, Amendments, Review

This Policy has been approved by the Board of Directors of Thessaloniki Port Authority S.A. and may only be amended or revised by it.

|----- End of Policy -----|