



ATHEXGROUP
Athens Exchange Group

HUMAN RIGHTS STATEMENT

of

ATHEXGROUP

**ATHEXGROUP supports
fundamental human rights both inside and outside
the Group, and demonstrates its commitment
by enacting responsible practices in the workplace.**



1. Introduction

The Group is fully committed to meeting its responsibility to respect human rights. Maintaining the highest ethical standards across the entire spectrum of its activities is an integral part of our values and ethical principles, as set out in the Code of Business Ethics.

The activities of the Group are conducted in an ethical manner, in full compliance with legal and regulatory requirements, with respect for human rights, and people are treated in accordance with the basic principles of this Human Rights Statement, the aim of which is the avoidance of any misconduct in connection with human rights.

Many of our key internal documents, including the Code of Business Ethics, along with a number of policies and procedures, reflect the Group's commitment to respect human rights. This commitment is governed by the basic principles of our corporate culture and is in line with a wide range of international standards, as well as with the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the OECD Guidelines for Multinational Companies, and the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work. We strongly support these international instruments within our work environment and in the territories where we are active.

In cases where national legislation does not cover internationally recognised human rights or when the implementation of those laws is not adequate, the guiding principles of the United Nations urge companies to operate in accordance with the highest international standard. Accordingly, in order to uphold human rights and promote equality, our Group – whenever deemed necessary – goes beyond compliance with national legislation by adopting international best practices.

As a Group, we believe in the fundamental dignity of every person and the right of every individual to live and work in safety, without fear of oppression or coercion. Our regulations, along with the Code of Business Ethics and the Human Resources Policy, place emphasis on responsibility, integrity, and values-based decision-making and set out our standards for conducting our business practices ethically and consistent with our moral principles.

These principles and standards shape our interactions with colleagues, clients, stakeholders, suppliers, society, communities, the ecosystem and markets around the world, as well as with our shareholders. They are fundamental to our Group and enable our continued success and long-term effectiveness. Viewing our obligations in the context of a Group with an international presence and client base, we have incorporated within the Code of Business Ethics a number of corporate policies and procedures which help put the aforesaid principles into practice:

- **Equal employment opportunities and non-discrimination:** The Group is committed to creating a work environment that promotes personal and professional growth and that fully utilizes the abilities of its employees, regardless of age, ethnicity, disability, national origin, ancestry, race,



religion, gender, sexual orientation, gender identity and/or expression, genetic information, or any other legally protected classification. The Group prohibits discrimination based on any of these classifications.

- **Non-harassment:** The Group condemns any form of workplace, sexual, online or other harassment against any employee by any person, including other employees, fixed-term employees or trainees, contractors, suppliers, clients, carriers, or visitors.
- **Non-retaliation:** The Group protects any individuals who have reported concerns, sought guidance, or cooperated in an investigation and prohibits any form of retaliation or discrimination against them. Any employee that engages in retaliation is subject to disciplinary action.
- **Diversity and inclusion:** The Group is committed to maintaining a work environment that values diversity, equality and inclusion. Employees are expected to respect each other, clients, suppliers, and others doing business with us, irrespective of their professional, employment or personal differences and across all dimensions of differences.
- **Data privacy:** As set out in our Code of Business Ethics and applicable policies and statements on privacy and confidentiality, the Group respects individuals' rights to privacy in compliance with the legislative framework in force and uses personal data in accordance with the provisions of the aforesaid framework and only for business and work purposes.
- **Health and safety:** Employees and others working or visiting our facilities are expected, at all times, to maintain safe and healthy working conditions and to adhere to published operating practices and procedures, as these are set out on a case-by-case basis. The Group also has programs in place to safeguard individuals who travel for work reasons and takes increased measures to prevent and combat the spread of epidemics or pandemics.
- **Labour standards:** The Group is committed to ensuring a fair, supportive and inclusive workplace. This commitment includes compliance with applicable laws regarding workplace conditions and rights in the jurisdictions in which we operate. The Group adheres to laws pertaining to the establishment of works councils and employee representatives. The Group strictly prohibits forced labour or activities that support human trafficking.
- **Telework:** All the above-mentioned principles and practices are implemented even in times of crisis, when new circumstances and situations necessitate adaptation to new ways and conditions of work for our employees, for example telework. In this framework, we take steps to ensure that all the above principles remain in effect and are implemented, providing – wherever required – all the necessary means to enable employees to perform their duties.
- **Contribution to communities:** Being aware of our impact on the communities in which we operate, we are committed to working constructively with interested parties in those communities and ensuring that we listen, learn and take into consideration their views and needs during the conduct of our business activities. Wherever necessary, we contribute towards and – whenever required or useful – engage in dialogue with interested parties on human rights issues related to our business activities. We are equally committed to creating economic opportunities



and promoting goodwill in the communities where we are active by undertaking relevant local initiatives.

2. Scope and implementation

The Group consistently pays attention to the way in which its business activities can affect human rights and does not become involved in activities or relationships whenever there are clear indications of human rights violations.

The governance, prevention and response measures adopted by the Group are of particular importance in the following areas:

- respecting the human rights of employees and society
- preventing human rights violations through our business relationships with clients, suppliers and associates

To ensure effective implementation, we are committed to providing compulsory training on this Human Rights Statement to all employees on a yearly basis.

2.1. Employees

The Group strives to be an employer of choice for current and future employees. The issue of human rights in this context is very broad and encompasses, inter alia, the prohibition of forced and child labour, a commitment to fair remuneration and working hours, ensuring freedom of association, equality, respect and freedom of action.

In general, our approach is based on the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work, as well as applicable labour laws in the jurisdictions in which we operate. Amongst other measures, the Group has undertaken commitments in respect of the following standards:

2.1.1. Health and well-being

Steps have been taken to establish a modern system of prevention and protection in the workplace, aimed at continuously ensuring health and safety at work. At the level of prevention, Employee Assistance Programs are in place to address psychosocial risks and other factors that lead to low productivity, absenteeism and presenteeism.

By raising awareness about health and safety, and providing employees with direct and indirect access to health care, the Group helps reduce work-related accidents and illnesses.

2.1.2. Protection of personal data



According to applicable legislation, the personal data of employees are considered sensitive data and, as a consequence, special protection is required with respect to their management, processing (including storage and deletion), transfer, disclosure and/or communication.

The handling of employees' personal data must be in conformity with the relevant laws on the protection of individuals with regard to the processing of personal data and the free movement of such data, as well as with national legislative provisions on data protection and the respective laws.

Every person who processes employees' data is required to be aware of, comply with and implement all internal and external data protection regulations.

2.1.3. Diversity and inclusion

As set forth in our Code of Business Ethics, we are committed to treating everyone with dignity and respect, irrespective of position or working conditions.

The Group is committed to providing all employees with equal opportunities for employment and promotion, with respect for the rights of minorities and women, without any discrimination.

All employees are evaluated on the basis of their performance (as assessed on the basis of specific work-related behavioural indicators and targets) and are expected to understand and support the honest, fair and corrective feedback from their supervisors and colleagues.

2.1.4. Remuneration

The Group is committed to providing a fair and comprehensive remuneration package that ensures a decent standard of living and rewards employees competitively – in the context of the respective industry standards and the local labour market – in accordance with applicable labour laws, while efforts are made to attract and retain talented officers. Total remuneration consists of fixed monthly salaries, benefits and variable performance-based remuneration linked to profitability and other business indicators and targets at an individual and operational level.

2.1.5. Freedom of association

The Group complies with all applicable laws, rules and regulations pertaining to collective agreements, negotiations and freedom of association, as well as with international conventions such as International Labour Organization (ILO) Convention nos. 87 and 98.

We respect the right of all employees to participate in the Employees Association and we maintain an open dialogue with employees' representatives. We work with these representatives, in a spirit of cooperation and good faith, with the aim of ensuring harmonious labour relations and the well-being of employees. To further strengthen this relationship, the Group – in collaboration with employees'



representatives – has established and operates an Occupational Insurance Fund, in which all employees are entitled to participate and benefit from the various contributions of the employer companies.

2.1.6. Forced and child labour

The Group has a zero-tolerance policy to forced labour and child labour across the entire spectrum of its business activities both in and outside the country.

2.2. Clients

Our clients are active in all segments of the economy, including those where the risk of adverse impacts on human rights may be high. In view of this, we make every effort to understand the environmental and social risks associated with a particular client or transaction, just as we do for each financial risk.

In order to identify, prevent and mitigate any negative impacts on human rights, we have incorporated human rights issues (e.g. working practices, forced labour, children's rights, health and safety of workers and communities, etc.) in the Environmental and Social (ES) due diligence process, in the framework of evaluating the Environmental, Social and Governance (ESG) performance of issuing companies and major clients of the Group, which additionally forms part of the stage of assessing the risks of new issues.

In the course of the human rights due diligence process, we take into consideration internationally recognised best practices and standards.

The specific guidelines for our sector provide further guidance regarding the assessment and evaluation of risks and performance in respect of clients and transactions in the context of human rights.

Moreover, due diligence is supplemented by direct interaction with clients and external tools/databases which are available for supporting the risk assessment process, examining – whenever necessary – a certain collaboration with independent experts.

2.3. Suppliers

Suppliers belong to a category that is not part of the Group but provides it with products and/or services.

Every effort is made to work with suppliers whose human rights policies and practices are in line with our own, based on the applicable Supplier Code of Conduct. Suppliers are expected to respect the human rights of their employees, offer equal employment opportunities to all, and not tolerate any form of discrimination or harassment.

We expect our supplier partners and their supply chains to comply with all applicable laws and regulations in the jurisdictions, countries and territories in which they operate, especially labour law, e.g., no



tolerance for forced or child labour, compliance with safety and health rules and standards in the workplace, and the provision of fair pay and insurance to employees.

We maintain long-term relationships with our suppliers, whenever this is possible. If a supplier partner does not comply with applicable laws and regulations and/or our requirements, after issuing a warning we insist on improvements and reserve the right to terminate the relationship if our standards are not met and any shortcomings that have been identified fail to be addressed.

2.4. Complaint mechanisms and reporting

The Group seeks to engage in meaningful consultation with stakeholders in the framework of the human rights due diligence process and encourages all interested parties to communicate with the organisation in cases where they have clear evidence of non-compliance with relevant procedures in its effort to prevent or avoid any harm to human rights or its wider involvement in human rights issues.

Clients and the general public may contact us or submit complaints online at ethics@athexgroup.gr for examination by the competent services.

Any complaints, including those related to human rights, are initially handled in accordance with the reporting and complaints policy.