

HUMAN RIGHTS POLICY

At FOURLIS Group we operate responsibly and we constantly evolve, in all the countries of activity, while being committed to our Values and having as a priority the respect for all our people and stakeholders, the support of the society and the protection of the environment, aiming at sustainable development at a financial, social and environmental level.

Our Values

Integrity, Respect, Efficiency

Our Vision

Passion for better living!

Our Mission

To create superior value for our customers, people, shareholders and society, by delivering goods and solutions for better living.

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1. Policy statement – Our commitment

Respect for Human Rights is a matter of fundamental importance for FOURLIS Group of companies, as stated at its principles: Integrity, Respect, Efficiency.

We are committed to apply both the fundamental international Human Rights Principles and the national legislation in the countries in which we operate.

We are committed to ensure that all people are treated fairly, with dignity and respect.

We are committed to ensure a working environment of equal opportunities, free from any form of discrimination or harassment for all our employees.

We are committed to promote respect and protection of Human Rights, both within the Company's internal environment, as well as in our sphere of influence with stakeholders.

The Group's [Code of Conduct](#) safeguards the fundamental principles of Human Rights.

2. International regulations, guidelines and standards

This policy is based on the applicable policies and procedures of FOURLIS Group and to internationally recognized standards and guidelines. Specifically:

- The International Bill of Human Rights (5 Declarations including the UN Universal Declaration of Human Rights).
- The 8 Fundamental Conventions of the [International Labor Organization](#) – ILO.
- The ILO Code of Practice on Recording and Notification of Occupational Accidents and Diseases.
- The Principles of the United Nations Global Compact (UNGC).
- The [Organization for Economic Cooperation and Development \(OECD\) Guidelines](#).
- The [Diversity Charter](#).
- The UN Guiding Principles on Business and Human Rights.

3. Scope and objectives

The objective of the Human Rights Policy is to provide FOURLIS Group with another means of declaring compliance with applicable laws and international standards and guidelines, making it clear that it respects Human Rights and shows no tolerance of any violation. For FOURLIS Group, the protection of Human Rights is part of its culture and a strong priority, both at Management and employee level.

This policy must be applied by all employees, regardless of their hierarchical level, at all companies of FOURLIS Group, in all its countries of operation.

At the same time, all suppliers/partners of the Group, as well as third parties working with them on behalf of FOURLIS Group, are expected to adopt the principles of this policy.

Compliance with the Human Rights Policy is monitored through a relevant, regular internal audit and compliance review, including the continuous assessment of potential risks of non-compliance across the Group's organizational units.

The Policy will be reviewed if necessary, depending on national and international developments, and its context may be amended.

4. Principles

4.1 Respect and equal opportunities for all

Respect is one of the corporate values that FOURLIS Group embraces (Integrity, Respect, Efficiency). The Group is committed to provide equal opportunities on recruitment and selection, training, remuneration and development of its human resources, focusing on professional qualifications, performance, skills and experience, regardless of race, ethnic or social origin, religion, descent, gender, disability, sexual orientation, age, marital status, political beliefs, or any other characteristics.

At the same time, FOURLIS Group has designed and implements a GDPR Policy, which is consistent with the Group's business needs, and safeguards and protects the personal and sensitive personal data of its clients, employees, retirees, and candidate employees. Further details are included in the GDPR Policy of FOURLIS Group and its subsidiaries.

FOURLIS Group applies a Recruitment Policy as well as an Open Resourcing Policy regarding employees' internal mobility, and development, ensuring equal opportunities and non-discrimination in the selection and development processes of employees.

FOURLIS Group is committed to ensure that all decisions regarding employment matters are free of any unlawful discrimination at all hierarchical levels. Furthermore, it has set up a Nomination and Remuneration Committee, ensuring transparency and meritocracy at Board level, and as of June 2021, it has established a Suitability Policy for Board members, approved by the General Assembly of Shareholders.

In order to further strengthen its commitment against discrimination and to the promotion of equality in the workplace, FOURLIS Group applies a Policy of Equal Opportunities and Diversity while it has signed the Diversity Charter and is committed to take action towards further and continuous promotion of no discrimination within the Group.

4.2 Freedom of association and collective bargaining

FOURLIS Group complies with the applicable legislation on the fundamental rights of freedom of association and collective bargaining. Furthermore, it is committed to facilitate dialogue between management and employees and accepts that employees and employers retain the right to establish and participate in employee/employer organizations/associations of their choice, with no discrimination or prior authorization. It also respects the right of such organizations/associations to form and participate in federations and confederations, which may in turn be linked to international organizations/associations of employees and employers.

At the same time, FOURLIS Group is totally opposed to any act of intervention aimed at restricting the freedom of these associations and considers that they should retain the right to draw up their own statutes and regulations, elect their representatives in full freedom, organize their administration and activities and formulate their action plans.

4.3 Forced or compulsory labor

The right to work must be freely granted and is an inalienable right of every employee to leave the company at its own will, always respecting the applicable employment laws of each country.

FOURLIS Group, as a multinational company, ensures that the terms of employment contracts respect the legislation in force in the country of operation, are in simple and comprehensive language and include detailed scope and clear information.

4.4 Child labor

FOURLIS Group respects the rights of children, including the right to the care and protection of their well-being, their right to education, to rest and having the freedom of expression.

More specifically, the Group does not permit the employment in its companies of any persons who are below the age of adulthood.

FOURLIS Group implements a summer employment program providing working experience to the children of Group employees aged 15-18 years, in compliance with the existing labor legislation in force and following the relevant internal Policy.

4.5 Working hours, compensation and other benefits

FOURLIS Group is committed to maintain a working environment of respect, meritocracy, transparency and mutual trust, protecting the standard of living and well-being of its employees. In this context, it respects the national legislation regarding minimum wage, in all countries of the Group's operation, ensuring the timely and regular payment of salaries, and operating in full compliance with all applicable laws on wages and working hours.

FOURLIS Group remunerates its employees taking into consideration the principle of equal and reasonable remuneration for the position in question, considering the level of responsibility as well as the knowledge and experience required for the employee to fulfil his/her duties. The objective is to create value for customers, shareholders, employees, and the economies of the countries in which FOURLIS Group operates.

FOURLIS Group has formulated a Compensation and Benefits Policy based on the Group's financial results, the evaluation of employee performance and market trends regarding remuneration by hierarchical level. In addition, the Group has a Nomination and Remuneration Committee which submits proposals to the Board of Directors regarding their remuneration, while it also applies a Remuneration Policy for the members of the Board of Directors, in accordance with the applicable legislation.

4.6 Occupational health and safety

FOURLIS Group is committed to provide and maintain occupational health and safety, focusing on the prevention and minimization of risks related to accidents, injuries, and exposure to health hazards, and has developed and adopted an occupational health and safety management system, covering all legislative requirements as well as the aspects of "ILO Code of Practice for the Registration and Reporting of Occupational Accidents and Illness". This system applies to all activities, shops, and facilities of the Group, as well as to all employees, along with suppliers, partners, customers and visitors.

Employees are also trained in health and safety issues regarding the protection of their wellbeing and safety, as well as that of customers, visitors and other stakeholders entering the Group's premises.

4.7 Harassment, violence and intimidation

The respect for Human Rights is a fundamental principle of the Group's operation. The companies of FOURLIS Group are committed to provide a positive, productive and safe working environment.

The Group encourages a safe working environment, without any discrimination, harassment or retaliation.

FOURLIS Group has an active presence in several markets, complying with each country's local legislation regarding harassment and violence issues in the workplace while it has also developed a Code of Conduct in all countries of activity, as well Internal Labor Regulations where required, and a Workplace non-discrimination, anti-harassment and violence prevention Policy, to ensure the elimination of harassment, violence and intimidation in the workplace.

4.8 Training and personal development

FOURLIS Group recognizes the importance of training and personal development of employees. In this context, it ensures that all newly hired employees are informed about the Group's structure, principles, Code of Conduct, and the Internal Labor Regulation of each company. At the same time, it has established the FOURLIS Learning Academy, to which all employees participate, regardless of their grade and always according to their role, duties and developmental needs.

4.9 Cooperation with suppliers and other partners

FOURLIS Group ensures the continuous improvement of its relations with suppliers and other partners, through the proper communication of the terms of cooperation and the basic framework of principles and values that should govern their collaboration. The Group applies a Code of Conduct for Suppliers/Partners as well as a Suppliers/Partners Acceptance Due Diligence Procedure, while it makes suppliers and other partners aware of all the above-mentioned human right commitments of the Group and expects them to be fully compliant with them.

FOURLIS Group ensures collaboration with suppliers and franchisors who meet European and national regulations for quality and safety of trading goods, in terms of design, production, use and labeling and will not allow or contribute, to the best of its knowledge, to adverse effects for Human Rights caused by the actions of its suppliers, or other third parties.

The Group also recognizes that forced labor can be linked to its business through professional relationship with third parties, including partners, contractors and suppliers. In this context, FOURLIS Group is committed to avoid any collaboration with partners/contractors and suppliers who are known to apply forced or compulsory labor practices in their operation.

4.10 Collaboration with local communities and stakeholders

FOURLIS Group recognizes that it constitutes a part of the communities in which it operates.

Through consultation with its stakeholders, the Group maintains its open channels of communication and is up to date about every concern related to Human Rights issues.

At the same time, it aims at increasing its socio-economic footprint by implementing numerous actions, meeting the actual and urgent needs of local communities, as well as maintaining existing and creating new job positions.

Moreover, during special circumstances (e.g., pandemic, natural disasters), FOURLIS Group either re-adjusts its programs or includes supplementary ones focusing on addressing these emergencies for the relief of the society and its members.

5. Reporting of concerns or grievances

FOURLIS Group is committed in creating workplaces which promote open and honest communication between anyone involved.

You can report anonymously or by name, any violations of this policy, or incidents of non-compliance with the current legislation, at FOURLIS Group Code of Conduct/Whistleblowing hotline operating 24/7, either via mobile or landline to: +30210-6293010. Alternatively, you can send an email to the following address: codeofconduct@fourlis.gr.

If Group employees wish to report any concerns, possible breaches of this Policy, or incidents of non-compliance with the applicable legislation, they can also contact their supervisor/manager, or the Group/company/store Human Resources Department, as well as any member of the Legal Department or of the Management of FOURLIS Group or its companies.

FOURLIS Group commits to preserving the anonymity of the concerns/reports/complaints, while ensuring that no acts of retaliation or revenge will occur against anyone by whom they were expressed. FOURLIS Group is also committed to investigate any concerns/reports/complaints and to implement all appropriate measures in response to any breach.

FOURLIS Group of companies reserves the right to modify this policy at any time, without any prior notice.

FOURLIS Group Human Rights Policy is posted on all communication channels of the Group.

For further information or clarifications regarding the Human Rights Policy, please do not hesitate to contact us at the following e-mails: csr@fourlis.gr, hr@fourlis.gr.

(The current Human Rights Policy has been developed in cooperation with KPMG Advisors Single Member S.A).