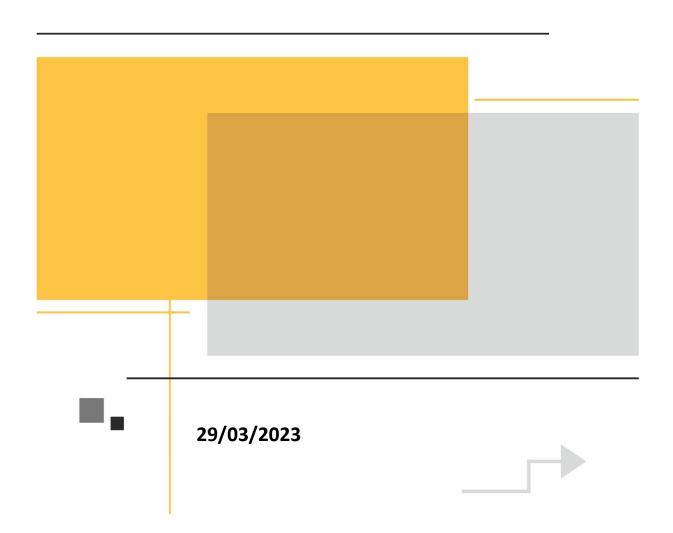




Human Rights Policy





DOCUMENT TITLE

HUMAN RIGHTS POLICY

POLICY TITLE	DOCUMENT TYPE	
HUMAN RIG	GROUP POLICY	
DATE OF ENTRY INTO FORCE	CODE	VERSION
29/03/2023	P07	3

ENTITY IN CHARGE / BUSINESS OWNER

GROUP HUMAN RESOURCES DIRECTOR

BOARD OF DIRECTORS

QUEST HOLDINGS

DOCUMENT ADDRESSED TO

The personnel of Quest Holdings and its Subsidiary Companies.

CLASSIFICATION: PUBLIC DOCUMENT



1. Introduction – Policy Statement

Respect for human rights is for the Quest Group (i.e. the parent company "Quest Holdings Societe Anonyme", hereinafter referred to as "Quest Holdings", and its subsidiaries, hereinafter referred to as "Group Companies") as well as its social partners, an essential element of its sustainable development and a matter of fundamental importance, as is it incorporated within the Group principles of: Integrity, Mutual Respect, Effectiveness.

The Group undertakes to apply both the basic international conventions, charters and principles on human rights and the national legislation of the countries in which it operates. It is committed to ensuring that all people are treated fairly, with dignity and respect. It is committed to ensuring, for all its employees, a working environment of equal opportunities, without discrimination and harassment. It is committed to promoting respect and protection of human rights, both within the Group's internal environment and in its sphere of influence.

Respect for human rights is one of the fundamental principles of the Quest Group and is reflected both in the Code of Conduct and Ethical Behavior of the Group and in the Suppliers and Partners Code. .

This Policy establishes the framework for promoting respect and protection of human rights, both within the Quest Group's internal environment and in its sphere of influence. At the same time, the Quest Group has established a more specific Policy of Diversity, Equality and Inclusion, regarding the diversity of its personnel and members of the Boards of Directors of its companies.

The Management of the Group Companies are committed to comply with this Policy and have the necessary resources to implement it.

2. International Conventions, Declarations, Charts, Principles and Standards

The preparation of this Policy was based on the current policies and procedures of the Quest Group, as well as on international regulations (contracts/agreements, charters, etc.), internationally recognized standards and guiding principles. Indicatively:

- On the International Bill on Human Rights (namely, the Universal Declaration of Human Rights of the United Nations and International Covenant on Civil and Political Rights (ICCPR) and on Economic, Social and Cultural Rights (ICESCR));
- On the European Convention on Human Rights;
- On the 8 Fundamental Conventions of the International Labor Organization (ILO), in accordance with the 1998 Declaration on the Fundamental Principles and Rights at Work, reflecting the working standards of the ILO, aiming at ensuring accessible, productive and sustainable work worldwide in conditions of freedom, equality, security and dignity;
- On the United Nations Global Compact (UNGC). Since March 2022 Quest Holdings has been a member of the UN Global Compact with a commitment to the Ten Principles of UNGC;
- On the Diversity Charter of the European Commission;
- On the Guiding Principles on Business and Human Rights of the United Nations Global Compact.



3. Purpose

This Policy expresses the zero tolerance of the Quest Group in the violation of human rights, which is implemented both by the exemption of the Group's Companies in related violations, and by avoiding any transactions and contact with third parties that may have caused or exist reasonable suspicions that they may be involved in creating conditions that might cause infringements of those rights.

The purpose of this Policy is:

- To establish the principles and the guidelines pursuant to which the Group Companies shall organize their actions and their operation so that they are governed by respect for human rights.
- To increase of awareness and the assurance of the commitment of the employees and the associates of the Group Companies in respecting and protecting human rights in all areas of their business.

4. Scope

The Human Rights Policy governs the Quest Holdings and its subsidiaries in which it participates with more than 50% and/or has control over them (hereinafter Quest Group). The principles of this Policy are expected to be respected by all employees.

Furthermore, the partners, the suppliers and the parties concluding contracts with Quest Holdings and each Group company are encouraged to adopt this Policy. The Management of Quest Holdings and Group Companies communicate this Policy to partners and suppliers by posting it on their website, encouraging them to comply with these principles or other in line respective principles.

5. Policy Description

This Policy reflects the will of the Quest Holdings Management and the Group Companies to protect human rights throughout the Quest Group and its partners (stakeholders), as described in the following paragraphs hereof.

Human Rights

Human rights are ethical principles that set specific standards of human behavior and are usually protected as legitimate rights under national and international law. They are regarded as "commonly perceived inalienable fundamental rights to which a person is inherently entitled simply because she or he is a human being". These include civil and political rights such as the right to life and liberty ,freedom of thought and expression, and equality before the law. Human rights also include economic, social and cultural rights, such as the right to work, the right to health, the right to food, the right to housing, medical care, education and the right to participate in culture.

Human rights, therefore, are considered international (applied and valid everywhere) and protect equality (the same applies to all). The doctrine of human rights has clearly influenced international law as well as national constitutions, the policies of states and the action of non-governmental organizations and they are the cornerstone of public order around the world. According to the idea of human rights, "if the public discourse of peacetime global society can be said to have a common moral language, it is that of human rights.

The Quest Group, in the context of its business activity, respects and supports the protection of human rights, as set by the Ten Principles of the United Nations Global Compact.



It complies with the current (international and national) legislation, international conventions, declarations, charters, standards and principles in any activity and demonstrates due diligence to avoid synergy in case of human rights violations and is committed to recognition, evaluation, prevention and mitigating the risk of human rights violations.

In particular, it is committed to:

- Strengthening the awareness of its employees through information and education.
- Regularly evaluating the core business units of Quest Holdings and Group Companies, regarding the protection of human rights.

Areas where human rights violations are likely to occur

Some of the areas where human rights violations can be observed, as well as the attitude of the Quest Group towards these violations as indicative cases are listed below. The listing of these areas does not remove the obligation to respect all human rights.

1. Life, Freedom & Security

The Quest Group:

- → constantly strives to ensure a healthy and safe work environment, in accordance with both applicable legislation and the Group's Health and Safety Policy;
- \rightarrow considers the health and safety of its employees a core value and maintains and provides a safe working environment with a view to preventing possible accidents and injuries to employees during the performance of their duties, adopting high health and safety standards, as well as through actions to address general risks by providing training on health and safety issues:
- → ensures that in the workplace, incidents of violence (verbal or physical), harassment of any kind (such as sexual, psychological or moral) or situations of bullying are avoided. Management of all companies and employees are all responsible for ensuring that incidents of harassment and bullying are not tolerated. The Quest Group has an internal Policy on Violence and Harassment in accordance with the legislation in force;
- \rightarrow ensures that, according to case-by-case needs, security personnel are engaged in the protection of its assets and employees;
- → supports a proactive approach to environmental challenges, takes initiatives to promote environmental responsibility more broadly and encourages the development and dissemination of environmentally friendly technologies, limiting potential life and safety risks.

2. Non-Discrimination

The Quest Group:

 \rightarrow commits to and ensures non-discrimination on grounds of nationality, race, religion, color, social class, age, disability, sexual orientation, political beliefs, gender, marital status or any other characteristics and anything related to employment.

3. Appropriate Working Conditions

The Quest Group:

- → commits to maintaining a working environment based on trust, dialogue and mutual respect, striving for the existence and/or improvement of the work-life balance of its employees, providing support through social care benefits, depending on the local conditions and expectations. Examples of this support are: social family allowances, wellness programs, events for the children of employees and so on;
- → respects and supports the right of employees to motherhood and family life;



- → commits to ensuring decent wages and working hours, in accordance with the current legislation on working hours, overtime and leave;
- \rightarrow commits to promoting an environment and conditions of equality, adopting and promoting openness, trust and teamwork;

With regard to recruitment, employment, allowances, training, evaluation, promotion, remuneration and benefits, transfer and termination of cooperation, each employee shall be treated fairly within the scope of his/her duties as derived from his/her role. No factors specific to limited individuals and not related to work shall be taken into account, as this can be regarded as discriminatory practice.

-> ensures the development of employees, so that they are equipped with modern skills and knowledge in accordance with the requirements of the time and their duties.

4. Freedom of Association

The Quest Group:

 \rightarrow recognizes and respects the fundamental right to freedom of association and the right to collective bargaining, within the framework of existing legislation and current agreements. In the event that employees are represented by a legally established association, the Quest Group engages in an open and constructive dialogue with its legally elected representatives, with a relationship of mutual trust and with the aim of mutual benefit.

5. Forced Labour

The Quest Group:

→ undertakes to take all appropriate and necessary measures to prevent incidents, as well as any direct or indirect involvement in any form of forced or compulsory work.

6. Child Labour

The Ouest Group:

 \rightarrow undertakes to operate in accordance with the applicable legislation regarding the minimum age limits for the recruitment of workers in all the areas in which it operates. Quest Group does not employ minors under the age of 18.

7. Combating Corruption

The Quest Group:

→ operates against corruption in all its forms.

Local Community

The Quest Group:

- \rightarrow as a responsible corporate citizen, recognizes its influence in the communities in which it operates and commits to cooperate with the groups of social partners of these societies, with the aim of ensuring that it listens and takes their views into account when conducting its business activities.
- \rightarrow as a responsible corporate citizen, recognizes its social responsibilities and actively promotes respect for Human Rights. Acting and showing interest for the community, in which it operates, is the best way to meet its social responsibility obligations and have positive changes brought about where necessary in the community.

Disciplinary Practices

The Quest Group:



ightharpoonup is committed to treating all its employees with dignity and respect. Disciplinary practices are implemented, if deemed necessary, as a management tool to prevent and deter unacceptable behavior and are consistent with labor law.

Employee liabilities

Issues related to respect for human rights may arise in any interpersonal contact, in the capacity of Director, Supervisor, colleague or business partner. Therefore, all employees of the Quest Group must have read and understood this Policy in order to be able to ensure that they act in accordance with it in the context of their duties and under their capacity.

All employees of the Group are encouraged to be informed of internationally recognized human rights by referring for this purpose, inter alia, to the material posted on the website www.ohchr.org by the Office of the United Nations High Commissioner for Human Rights (OHCHR) and also to participate in the relevant training programs and seminars organized by the Quest Group.

6. Reporting of incidents

Employees of the Quest Group must report any incident which they regard to be incompatible with the Human Rights Policy. It is the duty of all to report behaviors that cause or constitute a violation of human rights.

Through the basic mechanism for reporting infringements of the Code of Conduct and Ethical Behavior applied by the Quest Group, and as specifically defined in the "Procedure for the management of complaints/incidents of non-compliance", its employees are given the opportunity to express their concerns and report incidents of infringement of human rights, (anonymous or signed reports by mail (for the attention of the Regulatory Compliance Officer), as well as by e-mail at: milisemas@company.gr / where company indicates the corresponding Group Company.

Quest Holdings and Group Companies are committed to protecting the complainant, investigating incidents, and resolving complaints by taking corrective action (administrative or disciplinary measures).

Quest Holdings Management and Group Companies have the ability to contact the competent authorities for further investigation of the case or to report criminal acts.

In the event of a third party reporting an incident, the Quest Group shall carry out an investigation and assessment thereof.

7. Control of Application

The Human Rights Policy is compulsorily implemented by Quest Holdings and the Group's Companies inside and outside Greece while at the same time being responsible for the control of faithful application .

The Human Resources Unit of each company, as well as the Regulatory Compliance Unit, is responsible for controlling the faithful application of the policy.

8. File of Changes

Version	Date	Description
1	01/07/2016	Initial version of Policy
2	06/11/2020	Addition of new Rights under the Global Compact. Addition of Policy
3	29/03/2023	Improvement additions and amendments. Separation of the Diversity Policy and its renaming to Diversity, Equality and Inclusion Policy.

7 OF 7 HUMAN RIGHTS POLICY 29/03/2023