



THE RETAL GROUP

ANTI-DISCRIMINATION AND ANTI-HARASSMENT POLICY

1. INTRODUCTION

The RETAL Group (“we”, “us”, “our”, the “Company” or “RETAL”) is committed to providing a safe and healthy work environment in which all employees and other individuals who may affect, be affected by, or perceive themselves to be affected by our decisions or activity (“stakeholders”) are treated equally and fairly with respect and dignity, and where there is no place for any form of discrimination, harassment and bullying.

2. PURPOSE AND SCOPE

2.1. The purpose of this RETAL Group Anti-Discrimination and Anti-Harassment policy (the “Policy”) is to:

- reaffirm our commitment to fairness and respect as the values declared in the RETAL Group Code of Business Conduct;
- prohibit discrimination, harassment, and bullying in the workplace as types of conduct contradictory and/or detrimental to our values, and to establish a mechanism for its prevention and suppression;
- provide clear definitions of the wrongdoings concerned and prohibited behavior;
- indicate the means to be used for the prevention of discrimination, harassment, and/or bullying from occurring, and to detect and process them, should they happen, with the corresponding liabilities;
- guide employees and stakeholders on how to report violations of this Policy and explain how reports will be processed.

2.2. This Policy supplements the applicable laws, rules and regulations prohibiting and establishing liability for discrimination, harassment, and workplace bullying in all the countries in which RETAL operates.



3. APPLICATION

This Policy applies to the management, officers, employees, and all individual contractors (collectively referred to as the “employee” or the “employees”) of the companies that are members companies of the RETAL Group (the “Group”) and shall be formally adopted by the respective companies and pursued as part of their internal regulations.

4. DEFINITIONS

“Discrimination” is the unlawful and/or unequal treatment of an employee based upon legally protected statuses such as race, color, origin, nationality, religion or other belief system, religious creed (including religious dress and personal grooming practices), physical or mental condition, marital status, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender identity, gender expression, age, sexual orientation, veteran and/or military status or any other attribute protected under applicable law.

“Harassment” is a type of discrimination expressed in an offensive, unwelcome and unwanted behavior related to a protected status like age, race, sex, or human dignity. Harassment can be verbal (such as slurs, jokes, epithets, intimidation, ridicule, mockery), written (mail, emails, text messages, social media messages), visual (offensive posters, symbols, drawings) physical assaults or threats, and interference with work performance.

“RETAL Group” and “Group” is RETAL INDUSTRIES LIMITED and each of its direct and indirect subsidiaries.

“Workplace” means the premises or area where employees perform their work function, including production sites, offices and any other places where employees are present in connection with our business.

“Workplace bullying” is the offensive, unwelcome, and unwanted behavior of an employee or a group of employees having authority or power (either by the position held or personal physical or mental strength) creating an intimidating, hostile, degrading, humiliating or offensive environment for another employee.

Bullying can happen to any employee and can be perpetrated by employees from higher, lower or same level as the employee being bullied. It can take place at RETAL’s work sites, but also outside the workplace as well as online (emails, social media, etc.).

The definitions of discrimination, harassment, and workplace bullying in this Policy are without prejudice to any other definitions or interpretations of these terms under the applicable laws in the respective country. Such terms may have different interpretations in different countries and will be taken into consideration as appropriate.



5. IMPLEMENTATION – PROCEDURE AND RAISING AWARENESS

- 5.1. RETAL will implement the relevant human resources procedures to prevent discrimination, harassment, and workplace bullying from occurring.
- 5.2. RETAL will effectively communicate the Policy, inform and raise awareness on its content. All raising awareness and informative actions listed below shall be jointly defined and implemented by employees responsible for human resource management and the Group Communication and Sustainability directors.
 - The Policy and its subsequent versions will be available to RETAL employees and stakeholders on RETAL’s intranet and corporate website.
 - Communication of the Policy, informative and raising awareness activities will be periodically organized for all RETAL employees and be part of the onboarding process for newcomers to ensure the proper understanding of and compliance with the Policy.
 - Periodical evaluation of employees will be performed to check their knowledge of the Policy and define the need for training and information.
- 5.3. The management of the RETAL Group companies (CEOs, General Managers, etc.) is responsible for implementing the necessary actions not contemplated in this Policy to ensure compliance with the applicable legal requirements.

6. REPORTING AND WHISTLEBLOWING

- 6.1. RETAL strongly encourages employees who suffer or become aware of any actual situation of discrimination, harassment, or workplace bullying or believe that such situation may or will occur, to report said circumstances or her/his good faith complaints and concerns as soon as practicable.
- 6.2. RETAL also welcomes good faith initiative of any external stakeholder or third party to report any actual or suspected situation of discrimination, harassment or workplace bullying.
- 6.3. If a person believes that any wrongdoing has occurred, such person is encouraged to promptly take one or more of the following actions:
 - address concerns about the situation to the immediate manager, head of Human Resources or Chief Executive Officer of the respective Company, either verbally or by corporate phone number or email;
 - if the person is uncomfortable speaking with any of the primary contacts or believes that such employees have not properly handled such concern or are



involved in the wrongdoing, the person may address a message by email at whistleblower@retalgroup.com or by post to RETAL INDUSTRIES LIMITED, attention of Chief Legal Officer | General Counsel, Epimitheos 6, Industrial Area A, 3056, Limassol, Cyprus.

7. INVESTIGATION AND NON-RETALIATION

- 7.1 All reports of discrimination, harassment, and workplace bullying situation will be processed and investigated in accordance with RETAL whistleblowing management system.
- 7.2 Moreover, even where a complainant conveys a request to withdraw his/her initial formal complaint, the investigation may be continued to ensure that the workplace is free from discrimination, harassment and retaliation.
- 7.3 RETAL will not retaliate or allow any retaliation of any kind towards employees and/or others who report an actual or suspected violation of the Policy, even if they turn out to be mistaken and regardless of the consequences for RETAL and its business, as long as the report is made in good faith.
- 7.4 Any form of retaliation of a reporting or whistleblowing employee is a violation of this Policy and should be reported immediately through the whistleblowing channels.

8. LIABILITY

- 8.1 Any employee who commits any act of discrimination, harassment, or workplace bullying as described in this Policy will be liable to disciplinary sanctions and liability provided for in local internal regulations and the applicable laws.
- 8.2 Violations showing the signs of criminal or administrative offences shall be reported to the appropriate law enforcement bodies without prejudice to any other remedies that may be available to RETAL under the applicable law, including imposition of disciplinary sanctions on the violators.
- 8.3 Disciplinary actions should be also imposed on those employees whose report was found to be made knowingly false and/or not in good faith and/or not in the spirit of 7.3 above.



9. GOVERNANCE

- 9.1. The Group Sustainability and Legal directors will periodically review and update the provisions of the Policy to ensure alignment with international standards, local regulations and RETAL's principles.
- 9.2. Periodical surveys will be conducted by the Human Resource function managers and Group Sustainability Director to collect employees' feedback on this Policy and associated procedures in order to improve them. Furthermore, all RETAL employees are welcome to spontaneously provide their feedback on this Policy and suggest ways in which it might be improved. Such feedback shall be made to the to the Group Sustainability Director at sustainability@retalgroup.com directly or via the employee's direct supervisor or corresponding HR manager.