



**POLICY AGAINST
DISCRIMINATION,
VIOLENCE &
HARASSMENT
AT WORK**

1.

Purpose & Scope

The purpose of this policy is to ensure a working environment that respects, promotes and safeguards human dignity and the right of every person to work free from violence and harassment. Avis Budget Greece is committed to prevent, tackle, and eliminate all forms of discrimination based on personal characteristics and choices as well as any violence and harassment that occurs during work, whether connected with it or resulting from it.

This policy is adopted in accordance with Law 4808/2021 (articles 9 & 10) and applies to the management and employees of the company under the name "OLYMPIC COMMERCIAL & TOURISM ENTERPRISES SINGLE-MEMBER S.A." (hereinafter referred to as "Avis Budget Greece") who are employed on employment contracts, work contracts, salaried mandate, independent services, temporary employment, through third party service providers, trainees and apprentices, employees whose employment relationship with Avis Budget Greece has ended, prospective employees of Avis Budget Greece, people who deal with or cooperate with Avis Budget Greece.



2.

Zero tolerance towards discrimination, violence & harassment

— Risk assessment

Avis Budget Greece is committed to tackle and eliminate discrimination, violence, and harassment in the workplace, with a view to ensuring a working environment where respect for human dignity prevails. It is therefore explicitly stated that discrimination based on personal characteristics or choices is not acceptable and any kind of discrimination, violence and harassment that occurs during work, whether related to it or resulting from it, is strictly prohibited.



Avis Budget Greece states that the following, indicatively and not restrictively, are strictly prohibited:

innuendo, mockery, sexual or racist jokes or comments, the use of offensive language, comments about someone's appearance or character that cause shame or embarrassment,

monitoring, stalking and unwanted verbal or physical attention towards a person,

sending messages with offensive/sexual content via SMS, email, social media, fax or letter,

offensive and persistent questions about someone's age, marital status, personal life, sexual interests or preferences, as well as similar questions about their race or nationality, including their cultural affiliation, identity and religion, sexual gestures or persistent suggestions for a meeting or threats, or – in any way expressed,

explicitly or innuendo – dependence / connection of the professional course of an employee in the Company on the acceptance or not of proposals of erotic content, rude gestures, touches and any kind of unwanted physical contact or attempt thereof,

the dissemination of malicious comments or insult of someone mainly due to discrimination for age, gender, type of marriage, cohabitation agreement, pregnancy and motherhood, any kind of disability, sexual preferences, religion or beliefs,

bullying or threats verbal or gestures or via the Internet, the devaluation or ridicule of a person or his abilities, either in private or in front of others, outbursts of anger against someone, persistent or unjustified criticism, exclusion from social events, workshop meetings, discussions and collective decisions or planning, offensive emails, letters and phone calls.

3.

Reporting, investigating and handling of complaints

Avis Budget Greece is committed to receiving, investigating, and managing any relevant complaint, with confidentiality and respect for human dignity, without obstructing the process in any way or by any means. Avis Budget Greece is committed to providing assistance and access to any competent public, administrative or judicial authority in the investigation of any incident of violence and harassment. For employees and those in any way associated with Avis Budget Greece who violate the obligations arising from this Policy, the necessary appropriate and proportionate measures are taken to prevent and not to repeat a similar incident or behavior.

In order to combat discrimination, violence and harassment, Avis Budget Greece has created an integrated mechanism for the submission, management and investigation of complaints/reports, with the installation of specific reporting channels. In particular, the Whistleblowing Policy reflects the principles of Avis Budget Greece, which cater for both prevention and resolving issues of violence and harassment at work. The Whistleblowing Policy includes in detail the steps that any complainant must take, as well as the responsibilities of the Company's bodies and the actions they must take to ensure the effective management of relevant incidents. If any Avis Budget Greece employee, or a third party associated in any way with it, believes that they have been subjected to discrimination, violence, or any form of harassment, or if they have determined that such conduct takes place in the work environment, they must follow the steps described in the Whistleblowing Policy to report the incident.



Avis Budget Greece has in place all the appropriate mechanisms to conduct a fair, timely, thorough, and objective investigation. All necessary measures have also been taken to ensure the cooperation of all parties involved, employees or third parties. Avis Budget Greece treats the handling of all incidents of reporting discrimination, violence and harassment with the utmost confidentiality and discretion. Persons who have submitted reports shall be informed upon the receipt of their report and regarding the progress of the investigation. Upon completion of the investigation, Avis Budget Greece will communicate the results as soon as this is practically feasible and appropriate.

If any Avis Budget Greece employee, or a third party associated in any way with it, believes that they have been subjected to retaliatory conduct as a result of lodging a complaint or assisting in the process of investigating incidents of discrimination, violence and/or harassment, they must follow the procedure described in the Whistleblowing Policy and report such incident of retaliation immediately.

Complaints regarding conduct that violates this policy will be accepted in writing, named or anonymously, based on the Whistleblowing Policy and will be investigated promptly and thoroughly. Competent body for the receipt and investigation of complaints is the Director of Internal Audit Department of Avis Budget Greece.

In order to safeguard the workplace and the integrity of the investigations, Avis Budget Greece may, inter alia, move employees or modify their working hours, pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be allowed.

If the outcome of the investigation shows that an incident of discrimination, violence or harassment or retaliation has taken place, Avis Budget Greece will take appropriate corrective, disciplinary and/or other actions against the violator.

These actions may include (indicatively and not restrictively):

- (a) disciplinary sanctions,
- (b) change of position, working hours, place, or way of providing the work,
- (c) termination of the employment contract or cooperation contract,
- (d) judicial actions. In any case, the offender may also bare criminal or civil liability, in accordance with the applicable legislation.

This Policy is applied in parallel with the applicable general legislation for the protection of the employee's personality and does not affect his/her legal rights in terms of civil and criminal legislation, as well as the rights to submit a Complaint before the competent Audit Authority.

4. **Malicious complaints**

Complaints that are proven to be manifestly malicious will be considered unacceptable and will be further investigated in the judgment of Avis Budget Greece, both in terms of motives and in terms of those involved, in order to restore order in any legal way and means.

5. **Further information** — Reference persons

All questions related to the implementation or interpretation of this policy should be submitted to the Compliance Department of Avis Budget Greece, which is appointed as the responsible department for informing and advising personnel on issues related to the prevention and treatment of violence and harassment in the workplace.





6.

Measures for the prevention, control and containment of risks

— Information & awareness

All employees and third parties in any way affiliated with Avis Budget Greece are expected to fully comply with this policy.

The policy applies to both workplaces and workplace-related venues, conferences, and events, whether on Avis Budget Greece's premises or outside, in-person presence, online or by telephone.

Avis Budget Greece ensures a work environment, accessible, safe, and friendly where the relations between employees, associates, management and members of its companies are distinguished by mutual respect, courtesy, honesty, understanding, trust, cooperation and support. Within the framework of its capabilities, Avis Budget Greece takes every appropriate measure and proceeds with any reasonable adjustment of working conditions for the protection of employment and the support of employees - victims of domestic violence.

Avis Budget Greece takes all the necessary measures to inform and raise awareness among the employees, using the appropriate means (e.g. printed and electronic material, etc.) to combat violence and harassment, ensuring that everyone is aware of the policy and procedures towards similar incidents and knows where they can turn if they are confronted with any of them.

Avis Budget Greece trains its executives to recognize discrimination, violence and harassment at work and provides the necessary support to its staff and associates.

Avis Budget Greece encourages its employees and any third party associated in any way with it, in the event that they witness an incident of discrimination, violence or harassment in the workplace, to report it immediately.

