

## Introduction

Human rights are at the very core of every responsible business. We aspire to be recognized as a company with a preeminent professional working environment where our employees feel safe and valued and where their human rights are respected. Our employees are vital and the foundation of our organization and therefore we will continuously work to prevent and mitigate adverse human rights impacts. Operating in selected parts of Information and Communication Technologies (ICT) in the fields of Defense, Security, Space, Telecommunications, Cybersecurity, eHealth and Environmental Protection, we recognize that we may become part of impacts on human rights. In particular The Right to Life; through our products, services and the industry we belong to. We also require our business relationships to respect human rights and commit by policy.

## Scope and Definition

There are 48 human rights defined in the International Bill of Human Rights. A full list of these can be found on next page.

## Compliance

AKMON respects human rights as defined by the UN Guiding Principles on Business and Human Rights. This assists us to comply with relevant National, EU and International legislation. We follow the implementation of these principles by the Cypriot and the Greek government, as well as the EU.

### We commit to

- Respecting human rights as outlined by the UN Guiding Principles on Business and Human Rights.
- Zero-tolerance towards slavery and human trafficking.

### We will

- Conduct human rights due diligence, including regular operational-level human rights impact assessments.
- Raise awareness and train our employees in human rights.
- Require our business partners to respect human rights.
- Provide channels such as *Ethics Line* and *Tell us your concerns* for our employees and external stakeholders to voice their concerns and report misconduct.
- Communicate this policy commitment and our human rights impacts both internally and externally.

### We expect you to

- Assist AKMON meet our commitment to respect human rights.
- Treat everyone in a respectful manner.
- Inform us immediately about any severe impacts that you become aware of; with us or our business relationships.

### Together we will

- Treat everyone with respect and dignity.
- Ensure that our working environment feels safe, tolerant, and supportive.
- Speak up if we see someone's human rights being impacted.

## List of Human Rights

- Right to self-determination
- Right to non-discrimination
- Right to work
- Right to equal pay for equal work
- Right to a living wage
- Right to safe and healthy working conditions
- Right to equal opportunities for everyone to be promoted
- Right to rest, leisure and paid holidays
- Right to form and join trade unions and the right to strike
- Right to social security, including social insurance
- Right to protections of mothers before and after childbirth
- Right to children's and young people's protection from exploitation
- Right to adequate food and its fair distribution
- Right to adequate clothing
- Right to adequate housing
- Right to water and sanitation
- Right to health
- Right to education
- Right to take part in cultural life
- Right to benefit from scientific progress
- Right to material gains from inventions
- Moral rights of authors
- Right to life
- Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment
- Right not to be subjected to slavery, servitude or forced labor
- Right to liberty and security of person
- Right to detained persons to humane treatment
- Right not to be subjected to imprisonment for an inability to fulfil a contract
- Right to freedom of movement
- Right of aliens to due process when facing expulsion
- Right to a fair trial
- Right to be free from retroactive criminal law
- Right to recognition as a person before the law
- Right to privacy
- Right to freedom of thought, conscience and religion
- Right to freedom of opinion
- Right to freedom of expression
- Right to freedom of information
- Right to freedom from war propaganda
- Right to freedom from incitement of racial, religious or natural hatred
- Right to freedom of peaceful assembly
- Right to freedom of association
- Right to protection of the family and the right to marry
- Right to protection of the child and right to acquire nationality
- Right to participate in public affairs
- Right to equality before the law, equal protection of the law and rights of non-discrimination

- Right to free, prior and informed consent to medical or scientific experimentation
- Rights of minorities (culture, religious practice and language)

## Discrimination and Harassment Policy

### Introduction

Right to non-discrimination is one of the 48 human rights listed in the International Bill of Human Rights. AKMON is committed to respecting human rights.

All employees should feel safe, secure, and comfortable when coming to work. The work environment should be one of tolerance, respect, and inclusion, free from any forms of discrimination, hostility, and harassment.

### Scope and Definition

Discrimination can be based on a variety of elements including, but not limited to, race, color, gender, language, religion, political or other opinion, national or social origin, property, birth or other status such as ethnic origin, disability, age health status, parental or marital status, or sexual orientation. Harassment comes in many forms, and includes among others, intimidating, bullying, and physical, psychological, verbal, or sexual harassment.

### Compliance

AKMON is committed to respect human rights as defined by the UN Guiding Principles on Business and Human Rights, as well as comply with international and national laws and regulations.

### We commit to

- Having a zero-tolerance policy towards all forms of discrimination and harassment.

### We will

- Refrain from discriminating in our recruitment and promotion processes, as well as in our daily business interactions.
- Provide and ensure a secure workplace free from all forms of discrimination and harassment.
- React prompt to any discrimination or harassment case brought to our attention.

### We expect you to

- Treat everyone with respect.
- Base all work-related decisions solely on merits and in compliance with this Policy.
- Encourage others to speak up and never engage in any form of discrimination or harassment.
- Report discriminatory and harassing behavior.

### Together we will

- Show respect and treat our surroundings in the same manner we would like to be treated.

- Speak up when we see someone being subjected to discriminatory or degrading behavior.

## Diversity Policy

### Introduction

At AKMON, we recognize and value diversity and gender equality in our workforce. Diversity is about bringing together a rich mix of people with different perspectives and backgrounds.

We believe that variances of thought, skills, background, experience, and work styles are crucial for the sustainable business development and future of AKMON. Our recruitment, development, and career building activities are based on the premises of equal opportunity and of supporting a diverse talent pool.

### Scope and Definition

Diversity encompasses a wide range of visible and invisible attributes; e.g. age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability as well as a diversity of talents, skills, experiences, and abilities.

### Compliance

AKMON is committed to respect human rights as defined by the UN Guiding Principles on Business and Human Rights, as well as comply with international and national laws and regulations.

### We commit to

- Providing an inclusive and welcoming environment for all people, including, among others, employees, customers, suppliers, and business partners.

### We will

- Maintain a strong focus on diversity and equal opportunity in recruitment, compensation, termination and other conditions of employment, as well as provide adequate training for our employees and leaders.
- Maintain an inclusive and tolerant workplace.

### We expect you to

- Be respectful towards everyone with whom you interact.
- Take into account diversity, when making a recruitment, development activities, or promotion decision.
- Specifically, if you hold a management position, to promote equal opportunities

### Together we will

- Create an inclusive, harmonious, and welcoming workplace.
- Treat everyone with respect and be respectful of cultural and other differences.

## Health and Safety Policy

### Introduction

Occupational health and safety is essential in any workplace. AKMON is dedicated to providing the best possible working environment for our employees as this is a necessary and vital condition for ensuring job satisfaction, health and safety, a positive work life, and for AKMON to be an attractive workplace.

### Scope and Definition

This policy covers the physical and psychological working environment, and the general well-being and safety for all employees at AKMON. It also covers employees on travel for AKMON. This includes, but is not limited to, safety regulations, handling of occupational accidents, mental wellbeing (e.g., stress), facilities, work life balance, and substance abuse.

### Compliance

AKMON is committed to respect human rights as defined by the UN Guiding Principles on Business and Human Rights, as well as comply with relevant national and international health and safety regulations and requirements.

#### We commit to

- Providing a safe and healthy working environment for our employees and to prevent accidents.

#### We will

- Invest in our employees' health, motivation, safety and systematically improve the working environment.
- Implement relevant guidelines and procedures and communicate these to employees.
- Register all reported incidents and develop new proactive measures to ensure the prevention of similar future incidents

#### We expect you to

- Observe the health and safety rules and take the necessary precautions in order to protect yourself your co-workers/colleagues, and any visitors.
- Report all accidents, near-misses, injuries, and unsafe acts and conditions.
- Adhere to AKMON' s Alcohol & Drug Policy to maintain a workplace free from illegal use, possession, sale, or distribution of drugs and alcohol.

#### Together we will

- Remind our colleagues and visitors of the applicable rules.
- Keep an eye out for our colleagues. Stop immediately any unsafe behavior that we might witness.

## Data Privacy Policy

### Introduction

The right to privacy is a human right. The well-being of our employees is a high priority in AKMON and respecting their rights as individuals is essential.

AKMON is dedicated to ensuring the privacy and protection of our employees' personal data in compliance with applicable laws and regulations.

### Scope and Definition

Personal data is defined as any information relating to an identified or identifiable individual, a 'data subject', such as an employee, business partner, supplier, customer, etc.

In practice, personal data is a wide array of information that – either by itself or in combination with other information – can be used to identify an individual, such as name, date of birth, address and phone number, or other information, specific to the physical, mental, economic, cultural, or social identity of a person.

### Compliance

AKMON complies with relevant national and international legislation regarding data privacy such as the EU General Data Protection Regulation (GDPR). In order to achieve this compliance, AKMON has put in force the separate policy "QM - Q5 PERSONAL DATA SECURITY POLICY".

### We commit to

- Respecting the data privacy rights of our employees and all other individuals with whom we interact; and to demonstrating the utmost care in handling their personal data in a compliant manner.

### We will

- Describe which personal data we collect and how we use and store it and for which purposes.
- Raise awareness within our organization regarding data privacy and train our employees accordingly.

### We expect you to

- Safeguard all personal data entrusted to you and to ensure that the principles of data protection and data privacy are applied.
- Adhere to AKMON 's data privacy procedures, including AKMON 's Data Privacy Handbook.

### Together we will

- Use personal data only for the particular and legitimate purpose for which it was collected.
- Maintain confidentiality of any personal data we have been entrusted with.
- Ensure we do not keep personal data any longer than necessary.

## Report your Concerns

Every employee is responsible for knowing what is expected. By becoming familiar with this Code and the policies and procedures it highlights, you will be better equipped to recognize and handle ethical dilemmas. It is important to ask questions or raise issues if you experience a situation that might have ethical implications. When in doubt: speak up. Talk to your colleagues, manager, or relevant.

## Reporting Channels

AKMON has two reporting channels, Ethics Line and Tell us your concerns, to report concerns depending on the seriousness of the concern. Please note, that no classified information can be reported in any of the two systems.

## Ethics Policy

AKMON 's Ethics Policy offers a confidential and safe channel where any employee or third party of AKMON (e.g., suppliers, consultants, etc.) can report to the Administration concerns if they suspect that serious or illegal misconduct or other potential wrongdoing is taking place. The reporting procedure operates in strict compliance with data privacy regulation. All reported incidents will be handled in an anonymous and professional manner without fear of retaliation for reporting. You can report serious or illegal misconduct and other potential wrongdoings including, but not limited to:

- Criminal offences, including bribery, fraud, and forgery of documents
- Violence or assault against employees
- Security breaches
- Violation of laws and regulations
- Violations of trade sanctions

## Tell us your concerns

Tell us your concerns is an internal procedure for AKMON employees. All reports will be treated in a professional and confidential manner and the whole process is transparent.

You can report concerns and other potential wrongdoings such as but not limited to:

- Bullying
- Harassment
- Environmental negligence
- General work conditions
- Discrimination

Reports concerning the physical working environment should be reported to the Administration and to the “External Safety Advisor.”

### **Protection and Non-Retaliation**

Retaliation against an employee for reporting an issue or raising a legitimate concern involving a violation of company policy, law, or regulation is strictly prohibited. Allegations of retaliation will be treated seriously and be thoroughly investigated. Confirmed allegations of retaliation will result in appropriate disciplinary action, up to and including termination of employment.

AKMON is committed to protect and support our employees. Any employee who refuse to act unethically, in keeping with AKMON ’s Anti-Corruption Policy and procedures, as well as or other relevant policies, will be protected and supported even when such actions result in loss of business or other disadvantages to AKMON.

### **Disciplinary Measures**

All employees are expected to comply with all of the policies described, as well as applicable national and international legislation, regulation, and other requirements.

If ever in doubt on how to act, it is the responsibility of the employee to seek guidance and talk to his/her manager or relevant department.

### **Consequences for Violating this Code**

Depending on the gravity of the violation, disciplinary measures range from an oral or written warning to termination of employment, and in cases of illegal misconduct prosecution. All violations will be noted in an employee’s HR file.

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