



Labour & Human Rights Policy

Version 2.1 | 2025

1. Scope, Purpose & Management Commitment

Goldair Cargo S.A. recognizes that respect for human rights and fair labour practices are fundamental to sustainable business operations. This Policy Framework establishes the company's binding commitments and operational procedures across all areas of labour and human rights, in full compliance with Greek Law 4808/2021, EU directives, ILO Core Conventions, and the UN Guiding Principles on Business and Human Rights.

The Vice President & Managing Director holds overall accountability for this Framework. Each Department Head is responsible for implementation within their area. This Policy is reviewed annually and any material changes are communicated to all employees within 30 days of adoption.

2. Certification & Standards Framework

Goldair Cargo S.A. operates an Integrated Management System certified against multiple international standards. Labour and human rights requirements are embedded within this certified system, providing independent third-party assurance of the company's commitments.

Certification / Standard	Scope
ISO 45001:2018	Occupational Health & Safety Management System – certified
ISO 9001:2015	Quality Management System – certified
ISO 14001:2015	Environmental Management System – certified
ISO 22000:2018	Food Safety Management System – certified
ISO 13485:2016	Medical Devices Quality Management – certified
SEDEX / SMETA	Social & Ethical audit covering labour rights, H&S, environment and business ethics
GDP (Good Distribution Practice)	Pharmaceutical distribution standards – certified

The Integrated Management System is governed by the Quality, Social Responsibility, Environment, Health & Safety and Food Safety Manual (EGX, Edition 8, effective 01/12/2025), approved by the Managing Director and maintained by the Quality, Social Responsibility & Environment Manager.

3. Anti-Discrimination & Anti-Harassment

3.1 Policy Statement

Goldair Cargo S.A. is committed to maintaining a workplace free of all forms of discrimination and harassment. No employee, candidate, contractor or visitor shall receive less favourable treatment based on gender, gender identity, race, ethnic origin, age, disability, religion, beliefs, sexual orientation, pregnancy, or any other protected characteristic.

This commitment is implemented in accordance with Law 4808/2021 (Government Gazette A 101/19.6.2021), EU Equal Treatment Directives, and ILO Conventions C111 and C100. It is further

operationalized through the company's Social Responsibility Procedure [ΔIAX.16, Section: Discrimination].

3.2 Definitions

Discrimination: Any form of unequal treatment, whether direct or indirect, intentional or unintentional, during recruitment, compensation, access to training, promotion, termination or retirement, based on any protected characteristic.

Harassment: Unwanted conduct related to a protected characteristic that violates dignity or creates an intimidating, hostile, degrading or offensive environment, including sexual harassment.

Gender Equality: Equal enjoyment of human rights, decision-making power, representation, opportunities and resources regardless of gender or sex at birth.

3.3 Procedures

- Annual risk assessment of discrimination and harassment risks at all sites
- Mandatory anti-discrimination and anti-harassment training for all employees upon onboarding and every two years thereafter [ΔIAX.03]
- Designation of the General Manager as the company-level Liaison Officer (as per Law 4808/2021) responsible for receiving, investigating and handling complaints
- Confidential complaint channel accessible to all employees at all times
- Complaints investigated objectively; findings communicated in writing to complainant
- Zero tolerance for retaliation against complainants or witnesses
- Disciplinary measures up to and including termination for confirmed violations
- Active monitoring of male/female composition at all organizational levels and actions to strengthen women in management roles [ΔIAX.16, Section: Gender Equality]

4. Career Management & Training

4.1 Policy Statement

Goldair Cargo S.A. is committed to the continuous professional development of all employees. Access to training and career development opportunities is provided on a fair and non-discriminatory basis. The company operates a formal Training & Development procedure as part of its certified Integrated Management System [ΔIAX.03 – Personnel Training Procedure, Ed. 5, 01/12/2025].

4.2 Training Framework

Training needs are identified annually (or semi-annually) by Department Heads and consolidated by the Quality & System Manager, with approval from the Managing Director. Training categories include:

- Health & Safety – mandatory, annual (including emergency response drills) [ΔIAX.03, Section: Emergency Training]
- Induction training for all new employees covering: Quality, Environmental, Social Responsibility, H&S policies, employee rights, PPE, first aid and complaint procedures [ΔIAX.03, Section: New Employee Induction]
- Social Responsibility awareness – employee rights, freedom of association, non-discrimination, grievance mechanisms [ΔIAX.03, Section: Social Responsibility Training]
- Ethics and anti-corruption
- Technical and role-specific skills
- Leadership & Management development

- Pharmaceutical and medical device handling (GDP/GMP) for relevant staff [ΔIAX.03, Section: Medical Devices]

4.3 Career Development

- All employees hold formal written job descriptions (E.ΔIAX.03.01) [ΔIAX.03]
- Annual performance appraisal conducted for all employees using a structured four-level rating scale (Very Good / Good / Average / Poor) [ΔIAX.03, Section: Personnel Evaluation]
- Development actions are defined for any employee rated below Very Good
- Internal vacancies are advertised internally before external recruitment
- Promotion criteria are documented, transparent and applied consistently
- All training is recorded in the electronic Training & Development file (E.ΔIAX.03.03); attendance sheets and certificates are retained [ΔIAX.03, Section: Records]

5. Fair Remuneration & Working Conditions

- All employees are remunerated in accordance with the applicable Collective Labour Agreement and Greek labour law; wages meet or exceed legal minimums
- Working hours, overtime and rest periods comply with applicable legislation
- Employment terms are documented in written contracts provided to each employee
- Equal pay for work of equal value is a guiding principle; pay equity is monitored and reported in the Annual Social KPI Report

6. Freedom of Association & Social Dialogue

6.1 Policy Statement

Goldair Cargo S.A. respects the right of all employees to freedom of association and collective bargaining in accordance with ILO Conventions C87 and C98 and applicable Greek law.

6.2 Procedures

- The company does not restrict, discourage or penalise employees who choose to join, form or participate in trade unions or employee representative bodies
- Union members, employee representatives and those involved in organising are not subject to discrimination, harassment, intimidation or retaliation
- Employee representatives have access to their members in the workplace
- The company participates in and complies with the applicable Collective Labour Agreement negotiation processes
- A formal grievance mechanism is maintained; employees may raise concerns without fear of retaliation [ΔIAX.16]
- Employee rights regarding freedom of association are communicated at induction and in Social Responsibility training [ΔIAX.03]

6.3 Communication Channels

- Regular all-staff briefings on company performance, strategy and sustainability
- Anonymous feedback and suggestion system available at all times
- Whistleblower procedure for reporting concerns (see Section 9)

7. Health & Safety

7.1 Policy Statement

Goldair Cargo S.A. is committed to providing a safe and healthy working environment for all employees, contractors and visitors. The company operates a certified Occupational Health & Safety Management System in accordance with ISO 45001:2018 and Greek Law 3850/2010 [EGX Ed.8, Section 6 – H&S Policy].

7.2 Management System

- Certified ISO 45001:2018 Occupational Health & Safety Management System [EGX Ed.8]
- Annual written Occupational Risk Assessment covering all workplaces and operations, including specific assessment for pregnant, new and nursing mothers
- Designated Safety Technician responsible for day-to-day health & safety monitoring
- Designated Company Doctor for employee health surveillance and mandatory annual check-ups
- Emergency evacuation plan posted at all sites; evacuation drills conducted at least annually [ΔΙΑΧ.03, Section: Emergency Training]
- Fire safety equipment inspected regularly; fire drills conducted at least once per year
- Personal Protective Equipment (PPE) provided to all relevant employees at no cost
- Hazardous substances management procedure in place (labelling, storage, handling, transport)
- Ergonomics assessment for all office workstations
- Vehicle safety programme for all drivers
- First aid training and equipped first aid stations at all sites
- Clean sanitary facilities, drinking water and meal break areas provided to all employees [ΔΙΑΧ.16, Section: H&S]
- All employees have the right to leave a situation of imminent serious danger without seeking prior permission

8. Child Labour & Forced Labour Prevention

Goldair Cargo S.A. strictly prohibits child labour and forced labour in all its operations and supply chain, in accordance with ILO Conventions C138 and C182, the UN Convention on the Rights of the Child, Greek Law, and the SEDEX/SMETA standard [ΔΙΑΧ.16, Sections: Child Labour & Forced Labour].

- The minimum age of employment is 16 years; employees under 18 are subject to special protections and may not work night shifts or more than 8 hours per day
- Young workers subject to compulsory education laws work only outside school hours; combined school, work and travel time shall not exceed 10 hours per day
- All employment is freely chosen; employees may terminate employment with reasonable notice as per their contract
- No employee is subject to debt bondage, retention of identity documents, or any form of coercion or trafficking
- No unpaid internships or traineeships [ΔΙΑΧ.03, Section: Recruitment]
- Due diligence on child and forced labour risks is extended to suppliers via the Supplier Code of Conduct
- Any confirmed case of child or forced labour will result in immediate remediation and/or contract termination

9. Whistleblower & Grievance Mechanism

Goldair Cargo S.A. maintains a formal Whistleblower Procedure (effective 01/12/2025) to protect individuals who report activities believed to be illegal, dishonest or unethical [Whistleblower Procedure, 01/12/2025].

- Current and former employees, and contractual parties, may report concerns relating to labour rights, discrimination, harassment, safety, corruption or ethics
- The designated Liaison Officer (Mr. Georgios Zavogiannis, tel. 2111804202, gzavogian@goldair.gr) is responsible for receiving, investigating and coordinating corrective action
- Concerns involving the Liaison Officer are reported directly to the Chief Executive Officer
- Confidentiality of complainants is protected to the maximum extent possible
- No retaliation against any person who makes a report in good faith
- Intentionally false reports are subject to disciplinary action
- The whistleblower is not responsible for investigating the alleged activity or determining corrective measures

10. Supply Chain & Supplier Requirements

Goldair Cargo S.A. extends its labour and human rights commitments to its supply chain. All suppliers and subcontractors are required to sign and comply with the Goldair Cargo Supplier Code of Conduct and to operate in accordance with applicable labour laws and ILO Core Conventions. Contracts include clauses on environmental, labour and human rights requirements. Suppliers are evaluated annually using a structured supplier assessment form.

11. Governance, Related Documents & Review

This Policy Framework is approved by the Vice President & Managing Director and distributed to all employees. It is reviewed at least annually as part of the Integrated Management System Review. Performance is measured and reported separately in the Annual Social KPI Report.

Related Document	Reference
Integrated Management System Manual	EGX, Edition 8, 01/12/2025
Social Responsibility Procedure	ΔΙΑΧ.16, Edition 1, 01/12/2025
Personnel Training Procedure	ΔΙΑΧ.03, Edition 5, 01/12/2025
Whistleblower Procedure	01/12/2025
Supplier Code of Conduct	Current edition
Business Ethics Policy	Current edition
Environmental Policy	Current edition
Sustainable Procurement Policy	Current edition
Annual Social KPI Report	Issued annually

Approved by:

Kallinikos Kallinikos



Vice President & Managing Director, Goldair Cargo S.A.

Date: December 2025