

## **LABOUR AND HUMAN RIGHTS POLICY**

Sofia Med recognises the right of all employees and stakeholders to work with dignity and believes that everyone in the company is responsible for having due regard for human rights.

Within Sofia Med, commitment on ethical principles is vitally important. Sofia Med supports the fundamental principles, as articulated in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines and the ILO Declaration of Fundamental Principles and Rights at Work. Sofia Med supports the protection of international human rights across the business value chain, and will not be complicit in human rights abuses. The company policies and procedures adhere to all applicable national laws concerning freedom of association and collective bargaining, non-discrimination, forced labour and underage workers in the workplace.

The commitment of Sofia Med relies on morals concerning the fundamental human rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

### Non-discrimination

Sofia Med respects diversity and avoids any form of unfair or unlawful discrimination in employment or occupation, in conjunction with promoting a culture where people recognise the value a diverse workforce brings. Sofia Med hires, assesses, remunerates and administers in a manner that does not discriminate in respect to gender, race or ethnicity, nationality, religion or other beliefs, age, marital status, disability, sexual orientation, political opinion, union affiliation, social or educational background. Workplace diversity at all levels is encouraged.

### Equality and equal opportunities

Sofia Med does not tolerate any discrimination based on gender, race or ethnicity, nationality, religion, age, social or educational background, disability, belief, sexual orientation, or political and trade union engagement. These principles apply to the recruitment of new employees, to employees with an employment contract, and to the professional promotion of employees. The only decisive factors of employment are performance, experience, personality, efficiency, skills, qualifications, and conduct.

### Freedom of association

Sofia Med upholds freedom of association and the effective recognition of the right to collective bargaining. Sofia Med retains an open and constructive dialogue with its employees and shall respect their rights to freely associate, organize, and bargain collectively in accordance with the applicable laws and regulations, in support of their mutual interests.

### Forced labour

Sofia Med rejects every form of forced labour. All work performed in the company and its business partners must be voluntary. No form of forced, compulsory labour is tolerated in Sofia Med.

### Underage workers

Sofia Med prohibits the employment of individuals under the applicable statutory minimum age for workers and in any case, at a minimum age of 18, except in the cases of vocational training for young individuals. Sofia Med is against all forms of exploitation of children. The company does not provide employment to children before they have reached the legal age to have completed their compulsory education, as defined by the relevant authorities and legal restrictions. Sofia Med expects its business partners and associates to have and uphold similar standards and abide by country-governing laws in countries wherein they operate.

### Harassment at workplace

Harassment (including all forms of sexual harassment and harassment based on other legally protected categories), bullying, rude or disrespectful behaviour and lewd comments are not allowed. Sofia Med prohibits any acts or threats of violence while conducting business on or off the company premises and in regards to external stakeholders or within the company people and management.

### Working conditions

Sofia Med compensates its employees with wages and benefits that meet or exceed the legally required minimum. Contracts have written agreements on employment, containing agreed terms and conditions. Employees at Sofia Med are ensured the respect of working hours set on national laws and relevant industry standards. Overtime work is voluntary and employees are compensated for overtime work in accordance with the local laws. Training is provided to all employees and Sofia Med is committed to equality of access to development and education opportunities.

Sofia Med must ensure that all employees enjoy a safe and healthy working environment and provide a general wellbeing in the workplace. Sofia Med commits to continuously improve health and safety performance by integrating Health and Safety aspects in all operations.

### Whistleblowing

The employees of Sofia Med are encouraged to raise any concerns regarding violations in the implementation of this policy and the Business Code of Conduct, including harassment, intimidation or discriminatory behaviour to employees, serious health and safety risks that could threaten the health and safety of employees, as well as the general public or customers. Sofia Med will accurately evaluate reported matters and, where appropriate, will adopt specific corrective measures to remediate all valid reported issues. Transparent communication on any identified human rights violations will be publicly available by Sofia Med.

### Compliance

Sofia Med shall comply with the provisions of this labour and human rights policy, as well as the national laws and regulations. Sofia Med must assess the implementation of the Labour and Human Rights policy in the planning and design of new business activities. Should there be differences between the content of this policy and the national laws or other applicable standards, the more rigorous requirements shall apply.

### Governance and accountability

Responsibility for the implementation of this policy lies with the most senior executive responsible for Sofia Med.

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Dr. Ioannis Papadimitriou  
General Manager