



LABOR & HUMAN RIGHTS POLICY

Athens,

June 2026

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1. INTRODUCTION

At PharmaPath, we consider respect for fundamental human rights and internationally recognized labor standards to be an integral part of our business ethics and sustainability strategy.

The Labor & Human Rights Policy expresses our ongoing commitment to operating responsibly, fairly and with integrity, while safeguarding the dignity, equality and respect of every individual directly or indirectly connected to our activities.

Through this Policy, we seek not only to comply with applicable legal requirements but also to continuously improve our corporate culture, internal operations and relationships with society and our stakeholders.

2. PURPOSE AND COMMITMENT

PharmaPath is committed to promoting, respecting and protecting fundamental labor and human rights for all employees, business partners and stakeholders.

This Policy reflects the Company's zero-tolerance approach towards violations of labor and human rights and its commitment to human dignity, ethical business conduct and the protection of the rights of all employees and stakeholders.

In developing this Policy, PharmaPath has taken into consideration internationally recognized principles and standards, including:

- The United Nations Universal Declaration of Human Rights
- The International Labour Organization (ILO) Fundamental Conventions
- The United Nations Global Compact Principles
- The United Nations Guiding Principles on Business and Human Rights

3. SCOPE

This Policy applies to:

- All PharmaPath employees, including permanent, temporary, fixed-term and part-time employees
- All business operations and locations where PharmaPath conducts activities
- Suppliers, contractors and business partners through contractual commitments and responsible supply chain requirements

4. CORE COMMITMENTS

4.1 Protection Against Retaliation

PharmaPath maintains a zero-tolerance approach towards any form of retaliation against employees, contractors or business partners who, in good faith, report concerns regarding labor or human rights violations.

No individual shall suffer adverse treatment for raising concerns, participating in an investigation or expressing a reasonable compliance-related concern.

4.2 Non-Discrimination and Inclusion

PharmaPath is committed to maintaining a workplace free from discrimination and promoting an inclusive culture where all individuals are treated with dignity and respect.

The Company prohibits discrimination based on:

- Gender
- Race
- Color
- Ethnic origin
- Nationality
- Religion
- Beliefs
- Age
- Marital status
- Disability
- Sexual orientation
- Gender identity
- Political opinions
- Trade union membership
- Social or educational background
- Any other characteristic protected under applicable national, European or international legislation.

Recruitment, performance evaluations, compensation, promotion and development decisions are conducted fairly, transparently and without bias, supporting diversity and inclusion across all levels of the organization.

4.3 Equal Opportunity

PharmaPath is committed to providing equal employment opportunities to all applicants and employees with respect to recruitment, career development, promotion, termination of employment and all other employment-related decisions.

Employment decisions are based on performance, qualifications, competencies, experience and professional conduct.

Any discriminatory practice is strictly prohibited, as it contradicts PharmaPath's core values and may result in disciplinary action in accordance with the Company's Code of Conduct.

4.4 Forced Labour, Child Labour and Human Trafficking

PharmaPath condemns and prohibits all forms of forced, compulsory or bonded labor, slavery, servitude and human trafficking.

All work performed within the Company must be voluntary, and no form of forced labor, debt bondage or involuntary labor shall be tolerated.

The Company recognizes its responsibility to remain vigilant regarding potential labor and human rights risks within its operations and business relationships.

In addition, PharmaPath fully complies with applicable national and international legislation concerning minimum working age requirements and does not employ individuals below the legally permitted age for employment.

4.5 Workplace Harassment and Conduct

At PharmaPath, we treat all individuals with dignity and respect and are committed to maintaining a workplace free from harassment and inappropriate behavior.

Any form of harassment, including sexual harassment, bullying, intimidation, abusive behavior, offensive comments, threats or violence, is strictly prohibited.

The Company is committed to investigating all reported incidents promptly, objectively and confidentially and to taking appropriate corrective actions where necessary.

4.6 Environment, Health and Safety

PharmaPath considers the health, safety and wellbeing of its employees to be a fundamental priority and core value.

The Company is committed to providing a safe, healthy and supportive working environment that promotes wellbeing, accident prevention and the protection of both physical and mental health.

PharmaPath maintains a dedicated Environment, Health and Safety Policy which:

- Complies with applicable national and European legislation and internationally recognized standards
- Incorporates processes for identifying, assessing and preventing occupational risks
- Encourages employee participation in fostering a strong safety culture
- Invests in training and continuous awareness on health and safety matters

The Company also recognizes environmental protection as an integral part of its sustainable operations and is committed to minimizing its environmental impact through responsible environmental management practices.

Health, safety and environmental protection are shared responsibilities. PharmaPath encourages open communication, active participation and continuous improvement in all related areas.

4.7 Working Conditions

PharmaPath is committed to providing fair, transparent and lawful working conditions.

The Company promotes an open-door culture, encouraging employees to raise concerns, ask questions, suggest improvements and discuss matters relating to compliance, ethics, quality and working conditions.

PharmaPath is committed to providing equal pay for work of equal value regardless of gender or any other protected characteristic.

The Company provides fair wages and benefits that meet or exceed applicable legal requirements and ensures that employment agreements clearly outline all agreed terms and conditions.

Working hours comply with applicable legislation and industry standards, while overtime is voluntary where applicable and compensated fairly.

4.8 Freedom of Association

PharmaPath recognizes and respects the fundamental right to freedom of association and collective bargaining in accordance with applicable legislation and internationally recognized labor principles.

Employees are free to join, establish or participate in trade unions or other employee representative bodies without fear of retaliation, discrimination or harassment.

4.9 Responsible Supply Chain

PharmaPath expects its suppliers, contractors and business partners to operate in accordance with the principles set out in this Policy.

The Company may take labor, social and human rights criteria into consideration during supplier selection, evaluation and business relationship reviews.

4.10 Community and Environmental Protection

PharmaPath takes all necessary measures to protect the environment and avoid activities that could negatively impact local communities.

To support this commitment, the Company:

- Supports local economic development through local employment opportunities and collaboration with local suppliers
- Maintains open communication channels with local communities and stakeholders

- Protects the environment and biodiversity through sound environmental management practices, pollution prevention and responsible use of natural resources
- Complies with all applicable environmental and land-use regulations
- Promotes environmental and social awareness through training, volunteering initiatives and cooperation with local organizations.

5. **RESPONSIBILITIES AND GOVERNANCE**

- The Human Resources Department is responsible for the implementation and monitoring of this Policy.
- The Sustainability Committee, or designated management representatives, oversees the integration of this Policy into the Company's sustainability strategy.
- Managers and supervisors are responsible for promoting compliance and supporting employees within their areas of responsibility.

6. **TARGETS**

PharmaPath is committed to achieving the following objectives:

- 100% of employees have access to this Policy
- More than 90% participation in relevant training and awareness activities
- 100% investigation of reported concerns related to labor and human rights matters

These targets may be reviewed periodically as part of the Company's continuous improvement process.

7. **COMMUNICATION AND MONITORING MECHANISMS**

- This Policy is communicated to all employees upon hiring and is available on the Company's website.
- An anonymous reporting channel is available through the Company's whistleblowing platform for reporting potential violations.
- The Policy is reviewed annually by Management to ensure its effectiveness and continuous improvement.

8. **DOCUMENT CONTROL**

Version	Effective Date	Approved By
1.0	22/06/2026	CEO