



DOCUMENT TITLE

HUMAN RIGHTS AND DIVERSITY POLICY

POLICY TITLE		DOCUMENT TYPE
HUMAN RIGHTS AND DIVERSITY POLICY		GROUP POLICY
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DOCUMENT ADDRESSED TO
The personnel of all Quest Group companies.

CLASSIFICATION: INTERNAL DOCUMENT

1 Introduction

The Management of each Company of the Quest Group acknowledges that the issues related to respect for Human Rights and Diversity are a fundamental value, which is integrated in the way of operation and promotes cooperation and productivity.

The Group embraces the 10 Principles of the UN Global Compact, which include, among others, Principles related to Human Rights and Labour.

The diversity of executives and board members of companies, in all its forms, contributes substantially to the improvement of decision-making, due to the consideration of issues through different views, perspectives and approaches. On the contrary, the lack of diversity can lead to a one-sided way of thinking and dealing with issues and wrong decisions.

The Management of each Company of the Quest Group is committed to comply with this Policy and to provide the resources required to implement this Policy.

2 Purpose

The purpose of the Human Rights and Diversity Policy is:

- To establish the principles and the guidelines pursuant to which the companies shall organise their actions and their operation so that they are governed by respect for Human Rights.
- The dissemination of best practice to the Group for reporting issues related to Human Rights within and outside the company environment.
- The qualitative improvement in decision-making and the enhancement of efficiency, through diversity in both the Boards of Directors and the other management bodies of the companies.

3 Scope

The Human Rights and Diversity Policy is addressed to the Management of each company of the Group and therefore to all Departments and employees.

Furthermore, the partners, the suppliers and the parties concluding contracts with each company are encouraged to adopt this Policy. The Management of each company shall notify and communicate this Policy to the partners and suppliers and shall exert influence to make them align accordingly by encouraging them to comply with these principles.

The issue of Diversity also concerns the members of the Nomination and Corporate Governance Committee, as well as all the members of the Board of Directors of Quest Holdings.

4 Policy Description

This Policy expresses the will of the Management of the companies for the protection of Human Rights throughout the Group and the stakeholders, as described in the following paragraphs, and for the support of diversity at all administrative levels, respect for all persons, irrespective of their particularities and the use of diversity to improve the work culture and results of companies.

4.1 Principles and Values

Human Rights are the fundamental rights of freedom and standards of treatment that all human beings are entitled to. The Group respects and supports Human Rights as referred to in the United Nations Universal Declaration of Human Rights.

The relationships between the company and the employees as well as the relationship between the companies shall be based on respect for the individual and the human rights.

- Equality, Non-Discrimination

It is a Group value not to allow any employment discrimination based on race, religion, color, origin, age, disability, sexual orientation, political belief, sex or family status. The companies shall establish such working environment and equal working conditions that adopt and promote openness and teamwork, encouraging the employees to go beyond the conventional behaviour and trust others.

As regards employment, recruitment, remuneration and allowances, education, evaluation, promotion, compensation and benefits, transfer and termination of cooperation, each employee shall be treated fairly, in accordance with his or her ability to meet the requirements and standards of his or her role. No factors peculiar to certain individuals and not related to work shall be taken into account, as this can be regarded as discriminatory practice.

- Zero tolerance for harassment and bullying

There may be various forms of harassment and bullying and their consequences may be severe. Management and employees are all responsible for ensuring that incidents of harassment and bullying are not tolerated. The companies are entitled to take disciplinary measures or legal action against those found to harass or bully others.

No employee shall be subject to physical, sexual, racial, psychological, verbal or any other form of harassment, bullying or violence. The Group has procedures to detect any problems in the implementation of this standard and to immediately and effectively address them.

- Zero tolerance for child labour

No form of child labour shall be tolerated within the Organisation as well as in the broader environment of partners-suppliers. No person under the age prescribed by the law shall be recruited.

- Forced Labour

No form of forced labour shall be tolerated within the Organisation as well as in the broader environment of partners-suppliers.

- Freedom of Association

In accordance with the Principles, Values, Policies and the Internal Regulation of the Group, the right to participate in labour unions is not hindered in any way.

- Balance between Professional and Personal Life

The Group systematically urges employees to maintain a balance between their professional and personal lives.

- Conformity to Law

The Group shall conform to the laws and regulations applicable to any business activity and shall exercise due diligence to avoid complicity in any case of violation of human rights.

- Local Community

Each company of the Group, as a responsible corporate citizen, recognises its social responsibilities and actively promotes respect for Human Rights. Acting and showing interest for the community, in which it operates, is the best way to meet its social responsibility obligations and have positive changes brought about in the community.

4.2 Diversity and Participation

The companies of the Group shall promote equal opportunities and shall seek to integrate all employees through the employment policies and practices adopted.

For this purpose, the main aim is to create an environment of acceptance, where everyone will feel respect and appreciation of others without being influenced by any difference in their personality and perceptions.

This behaviour extends to all stakeholders of the Group companies, such as suppliers, customers and partners.

Employees participate in the activities and development of the companies' operations based on their intention to participate, their experience and their abilities, without their participation being hindered by any diversity. The meaning of diversity shall be recognised and endorsed so that the workplace reflects the existing diversity of employees.

Meritocracy is supported in the selection, training and development of employees.

Companies make sure that there is no restriction on the performance of work or access to work due to diversity.

The evaluation of employees and executives of companies of all administrative levels, including the members of the Boards of Directors of the companies, is based on the knowledge, skills, experience, ethics, cooperation and practical acceptance and application of the Principles and Values of the Group and is in no way affected by any difference between the employee and the manager.

4.2.1 Members of Boards of Directors

Quest Holdings recognises the benefits of diversifying Board members, both its own and its subsidiaries and considers that through this it will maintain and strengthen its competitiveness.

It is sought that non-executive members have significant knowledge and experience both from professional sectors related to those of the Group companies, and from other sectors such as commercial, financial, business, technological, consulting, auditing, business management and human resource development, and others.

It is desirable to have a balance of membership from all the above sectors.

The skills and culture of the candidate members of the Board of Directors are difficult to assess and in fact in such a way that they are effectively combined with the skills and culture of the other members in order to achieve the best result.

However, these elements are important in the selection of candidates for the creation of a dynamic team that will enthusiastically embrace the vision of the Group and will create the appropriate culture in the organisation, with targeted and innovative decisions.

The important professional and administrative experience of the Board members is one of the requirements in the selection of candidates.

Nevertheless, age diversity is also sought, within the framework of what is feasible, which transfers experiences of different time periods and trends.

Selection of Board members of QH

The selection of the members of the Board of Directors is carried out following a non-binding recommendation by the Nomination and Corporate Governance Committee, with objective criteria, which are mainly knowledge and business experience, skills and leadership skills, character, integrity, ethics, adoption of the Principles and Values of the Group and the breadth of views, without being affected by gender, nationality, age, political beliefs or any other unfair criteria.

Succession of Board members of QH

The Nomination and Corporate Governance Committee plays an important role in creating a succession plan for Board members, which will take into account diversity in gender, knowledge, skills, culture and experience of the candidates, in order to create a dynamic team which, in addition to diversity, will combine effective collaboration between members.

4.3 Reporting incidents of discrimination

It is everyone’s duty to report behaviours that cause discrimination. The employees of the companies have to report any incident, which they regard to be incompatible with the Human Rights and Diversity Policy.

The employees can make the complaint to their Manager or the Management of the company or the Human Resources Department.

All complaints shall be recorded either by the complainant or by the party against whom the complaint is made and the authorised Manager shall be responsible to keep the relevant file.

Quest Holdings and the Group companies undertake to protect the complainant and investigate the incidents.

The Management of the company shall take all the necessary administrative or disciplinary measures to deal with the incident. Management shall have the possibility to refer to the competent authorities for further investigation or to report any crimes to the authorities.

5 Implementation Control

The Human Rights and Diversity Policy applies to all Group companies inside and outside Greece.

The CEO of each company is responsible for the loyal implementation of the Policy.

Quest Holdings retains the responsibility to monitor the loyal implementation of the Policy in all companies of the Group, through its competent executive officers and by using the available control mechanisms and the methodology it has designed.

The competent executives of the companies shall provide all the information required for the documentation of the implementation control of the Policy.

6 File of Changes

Version	Date	Description
1	01/07/2016	Initial version of Policy
2	06/11/2020	Addition of new Rights under the Global Compact. Addition of the Diversity Policy