

Table of Contents

1	Purpose	2
2	Scope	4
3	Preventive and Protective Measures - Awareness Campaigns	5
4	Obligation not to Obstruct Adherence to Policy	5

1 Purpose

Respect for human dignity, at all levels, is a key element of **ImprovIT** Code of Conduct. **ImprovIT**, demonstrating zero tolerance for incidents of violence and harassment in the workplace, adopts this policy, as a best practice and as a framework for preventing and addressing any violent and harassing behavior in the company's work environment.

This policy is governed by the following regulatory framework:

The measures and regulations against harassment and violence at work that the Code of Individual Labor Law, as in force, defines (arts. 58 - 69 of Presidential Decree 62/2025 (Government Gazette 121 A')).

Law 4808/2021 (Government Gazette 101 A') which ratified the International Labor Convention 190/21.06.2021 of the International Labor Organization (ILO), concerning the elimination of violence and harassment in the workplace (Part I, art. 1 et seq.) and the more specific provisions of the law, (in particular, art. 5, articles 9 and 10 of Part II of the same law) which aim to create a work environment that respects, promotes and ensures the right of every person to a world of work free from violence and harassment. The policy model for combating violence and harassment was considered and enriched (Ministerial Decree No. 82063/1-11-2021 Government Gazette 5059 B').

The company ensures that employees are informed about their rights, such as the fundamental right of the employee to enjoy working conditions that respect their health, safety and dignity, confirmed in the Charter of Fundamental Rights of the European Union (2010/C83/02 and articles 1,27,31).

The protection of the right to the personality of the employee in all its manifestations (such as, in particular, health, honor, dignity) is protected both as a general principle of law and in the domestic legal order (articles 57 and 58 of the Civil Code), and any violation of the right is regulated by the provisions of the same Code concerning tort liability (articles 914, 932).

In application of the above provisions, the company effectively establishes and is committed to providing a working environment that protects the health and safety of its employees, in every location where it carries out its activities.

All employees in the company, regardless of the type and nature of their employment relationship and the contractual status that connects them with the company, are required to behave legally and correctly during their work, showing empathy and respect for the personality of others.

The **ImprovIT** applies a policy of zero tolerance to any form of violence and harassment that occurs at work or is work-related, including gender-based violence and harassment, and expresses its commitment to address and eliminate such incidents. Forms of violence and harassment include, but are not limited to: Behaviors, acts, practices or threats that aim to, result in or are likely to result in physical, psychological, sexual or economic harm, as well as forms of behavior that aim to or result in violating the dignity of the person and creating an intimidating, hostile, degrading, humiliating or offensive environment, whether

occurring individually or repeatedly and regardless of whether they constitute a form of discrimination, and include harassment based on gender or other grounds of discrimination.

Consequently, any form of violence and harassment occurring during, related to, or arising from work is expressly prohibited, including gender-based violence and harassment and sexual harassment for all **ImprovIT** employees, regardless of the nature of their employment status, aiming at a place of work where respect for human dignity is the rule.

The objective of the Company's Policy is to define a framework on how to prevent, properly address and eliminate workplace violence and harassment as the best practice.

2 Scope

The Policy is applicable to:

- all employees and employees of the company, members of ImprovIT staff who have an employment contract of any type (permanent or temporary, fixed term or indefinite, full-time or part-time)
- people employed under a work contract, service provision and hired work (independent services, paid assignment)
- employees contracted by third-party service providers
- persons attending training programs, including interns, apprentices, and volunteers
- members of **ImprovIT** 's staff with an expired work contract
- candidates seeking employment with the company and applicants for employment

Any form of violent behavior and harassment that occurs during work, whether related to it or arising from it, and that may occur is prohibited. Forms of violent behavior and harassment may occur, especially:

- at workplace, including all common areas or private rooms, all locations where employment-related business is conducted, lunchrooms or breakrooms, restrooms, locker rooms, and all types of accommodation paid for by the employer, as well as any premises owned or leased by the company's clients, where improvIT personnel are dispatched to carry out work.
- in travel and during transport to and from work, during travelling for business or training reasons, as well as during other corporate functions and social events related to business
- during communications and during telephone conversations, including calls implemented via IT technologies and applications

3 Preventive and Protective Measures - Awareness Campaigns

The **ImprovIT** 's measures and actions taken to prevent, control, mitigate and address workplace violence and harassment risks, as well as the ways to monitor incidents or behaviors of that nature, particularly include the following:

- To publish the policy on the website and on the intranet and in summary on the company premises
- Personnel Awareness and Education
- Psychological Support Line
- Informal actions to address workplace violence or harassment

4 Obligation not to Obstruct Adherence to Policy

No staff member, including persons exercising managerial rights, is allowed to prevent/ impede another person from exercising their rights and from adhering to the obligations stemming from this Policy.