



HUMAN RESOURCES POLICY

October 2024

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Human resources (HR) is an “umbrella term” used to describe the management and development of employees in an organisation. Traditionally, Human Resources focused on hiring, terminations, and payroll. Yet, Human Resources has been reframed, covering a much wider remit from recruitment, onboarding and payroll, to employee benefits, training and further development. The Human Resources Policy {*hereinafter referred to as “the HR Policy” or “the Policy”*} applies to PharOS Pharmaceutical Oriented Services (*hereinafter referred to as “PharOS” or “the Company”*).

Policy Statement

Building and maintaining a strong people-centric culture at PharOS is among the strategic priorities. Our Human Resources Department serves to cultivate and strengthen our culture. Through strategic initiatives, policies, procedures, and practices, HR fosters an environment that encourages collaboration and promotes people’s professional growth. This requires a dynamic, multi-faceted approach that not only supports, but consistently nurtures a positive workplace culture. Consequently, PharOS is committed to providing transparent, effective, legal, and consistent human resource (HR) systems.

Objective

The main purpose of the HR Policy is to provide clear guidelines and standards for employee behavior and decision-making and to ensure consistency, compliance, and alignment with PharOS’ goals and values. Our HR Policy acts as a guide that supports a fair, inclusive working environment. It outlines the principles and practices that guide PharOS regarding labor rights, talent attraction, DE&I initiatives, employee performance and development, occupational health and safety, as well as employee wellness and personal development.

Scope

We are committed to fostering an atmosphere, where every employee feels valued, respected, and empowered to contribute their unique skills and perspectives. Our HR Policy ensures compliance with legal standards, establishes a shared foundation of trust and mutual respect, and aligns with our core values and long-term vision for success.

The current Policy applies to all individuals hired by the Company under any form of employment and in any unit (offices, laboratories, warehouses, etc.) and any location. Similarly, the Policy also applies to those employed under any form of dependent employment in businesses or units that come under the Company in any lawful manner, including through mergers, unless otherwise agreed. All staff are responsible for understanding and adhering to the present HR Policy.

Workplace Conduct

Our workplace conduct guidelines set the standards for respectful, professional, and ethical behaviour across the Company. We expect all employees to contribute to a positive, inclusive, and productive work environment, aligning their actions with our values to create a workplace that fosters mutual respect and collaboration.

Employment Practices

Our employment practices are designed to foster a fair, respectful, and supportive working environment that promotes growth and accountability. Our commitment is such that creates the foundation for a positive organizational culture.

Code of Conduct and Ethics

As a Company driven by the values of quality and growth, PharOS attaches great importance to the behaviour and conduct of the people representing it. A substantial part of our Company's accomplishments is attributable to the emphasis placed on our ethical business dealings and internal policies. Our Code of Conduct constitutes a binding framework on how PharOS' employees are expected to act in the course of their work.

Professional Behaviour Standards

We maintain high expectations for professional behaviour, encouraging employees to conduct themselves with high ethical standards, reliability, accountability, and responsibility. These standards further foster a supportive and productive environment, where employees can thrive, free from disruptive or unprofessional actions.

Respect for Human Rights

PharOS respects and supports internationally recognized human rights and operates with a sense of responsibility towards employees, while respecting their human rights. Within its sphere of influence, the Company ensures that it is not complicit in any human rights abuses or violations.

We are committed to ensuring a safe, inclusive, fair working environment, free from discrimination, harassment, and exploitation that promotes teamwork and trust and where all people are treated with respect and fairness. Concurrently, we are committed to respecting the dignity, freedom, and equality of all individuals, avoiding any involvement in activities that may contribute to human rights abuses.

We do not tolerate hostility, harassment, or retaliation. Through continuous diligence and transparency, we strive to ensure that our supply chains, partnerships, and services align with high ethical standards. We have created a grievance mechanism that establishes accessible and transparent channel for reporting various concerns, such as the "SpeakUP service", in order for raised issues to be investigated promptly and effectively. Additionally, we have a Whistleblowing Policy and an Anti-Violence and Anti-Harassment Policy that define the frame of acceptable behaviour.

Non-discrimination and Equal Employment Opportunities

We prioritize equality and strive to promote it in order to effectively respond to challenges, win top-talent, and support all employees. Merit and individual contribution is appreciated. Employment decisions (including hiring, promotions, additional benefits, compensation) must remain unbiased without any consideration to race, gender, age, disability, or any other characteristic to ensure equitable selection and promotion systems.

Diversity, Equity, and Inclusion

We cherish the differences among employees and foster an environment, with a variety of demographic characteristics and experiences. We believe in redistributing resources to ensure that all individuals have equal opportunities and promote freedom of expression.

Anti-Violence and Anti-Harassment

We do not condone or tolerate any act of violence, harassment or bullying against or by any PharOS' employee and maintain an "Anti-Violence and Anti-Harassment Policy", through which we seek to set clear guidelines, address, prevent, correct, and discipline behaviour that violates its content.

Workplace Health and Safety

We prioritize health and safety, as fundamental aspects of our workplace culture. Our commitment to creating a safe environment encompasses proactive measures to protect employee health, to support health and safety initiatives, and to promote a culture of health and safety awareness.

We have specifically set a workplace Environmental, Health & Safety (EH&S) Policy which ensures that all employees can perform their duties in a safe and secure environment. We regularly assess workplace hazards, provide necessary training, we minimize risks and protect the well-being of our people. We provide all employees with the necessary protective clothing, safety devices and equipment. Employees violating H&S regulations are liable to disciplinary actions that can lead to dismissal, depending on the degree of risk.

They have set and communicate our own Health and Safety Standard Operating Procedure (SOP) which lists all the measures and procedures that the Company may adopt and which may be altered to reflect regulatory requirements.

Emergency procedures are established to safeguard everyone's safety in the event of a crisis or any unforeseen situation. We provide training and resources to prepare for emergencies, including evacuation plans and safety protocols, promoting a secure and responsive workplace environment.

Dress Code and Personal Appearance

Our appearance reflects on ourselves and on the Company. PharOS' dress code is designed to support a consistent professional appearance. The goal is to ensure that we present ourselves positively and avoid offending customers, clients, or colleagues. Employees are expected to dress in smart business attire, unless the day's tasks require otherwise. Further details regarding the dress code are provided in the Employee Handbook, as well as the Code of Business Conduct.

Privacy, Protection, and Confidentiality of Data

PharOS takes all necessary steps to treat personal data confidentially and only collect, process and store data according to the provisions of the applicable data protection laws. Data privacy and confidentiality are critical to maintaining the trust of employees and stakeholders. The Company adheres to Policies and practices (indicatively, Privacy Policy, General Data Protection Regulation (GDPR) Privacy Notice for employees workers & contractors, Data Protection Policy, Information Security Policy) to protect sensitive information, ensuring that all personal and organizational data is handled with care and in compliance with applicable laws and regulations.

All employees are bound not to divulge or give to any third party, any confidential information, including but not limited to any kind of personal data of employees, associates, clients, suppliers, intentionally or unintentionally during the term of their employment in the Company, as well as upon termination. Upon termination of employment, an employee is obliged to deliver to the Company all such confidential information that the employee may have in their possession.

Acceptable Use of Company Resources

We expect the appropriate and responsible use of all organizational resources, tools, technology, and assets. Employees must utilize all resources efficiently while safeguarding against misuse or unauthorized access. To this end, the Company maintains an “Acceptable Use & Communication Tools Policy”, a “Laptop Policy”, and a “Mobile Phones Policy”.

Email and Internet Usage

The email and internet usage policy provides clear expectations for using Company email systems and internet resources. Employees are encouraged to use these tools for work-related purposes, while adhering to guidelines that protect against security threats and to ensure that appropriate communication standards are maintained.

Information Security Guidelines

Our information security guidelines establish the protocols for safeguarding our digital assets. Employees are required to follow best practices in data handling, including secure storage, access controls, and incident reporting, to mitigate risks and protect the integrity of our information systems. As per the Employee Handbook, the Confidentiality Agreement signed by every employee and the “IS 05 Information Classification and Handling Policy”, securing data and information is of utmost concern. Potential breaches on the security protocol lead to strict and swift disciplinary actions. Employees are given access to a Virtual Private Network which provides a secure connection to Company servers and networks. The VPN is to be used at all times during working hours. Should there be any problem of connection, the IT department is to be informed through email.

Recruitment and Selection

At PharOS, we strive to remain adaptable and responsive to new employees, as we are to our clients. Our recruitment and selection process is dedicated to attracting, identifying, and retaining top talent. We seek to appoint the best possible candidate for permanent, casual or contract-based positions and we implement fair, unbiased hiring practices. We strive to provide every candidate with a positive experience and a smooth transition to their new role. We maintain a “Talent Acquisition Policy” and implement a “Talent Acquisition Procedure” that consists of the following steps:

- Identify the hiring need: Assess and confirm the need for a new or replacement role within PharOS
- Create a detailed job description: Define responsibilities, qualifications, and skills
- Announce the job opening internally: Share the opportunity within PharOS to ignite interest and encourage internal applications
- Advertise the position externally: Post the job opening on external platforms to reach a broader pool of candidates
- Collect applications: Gather all incoming applications from internal and external candidates
- Review and screen applications: Evaluate applications to shortlist candidates who meet the criteria

- Schedule interviews: Arrange interviews with shortlisted candidates
- Select the final candidate: Choose the most qualified candidate and proceed with a fair offer

The recruitment and employee integration process are thoughtfully designed and periodically refined by the Company to align with both the Company's goals and the evolving industry standards.

Onboarding and Orientation

Our onboarding and orientation process is designed to provide new employees with a supportive transition into Pharos' working environment.

The onboarding process takes place in the first day through a standardized procedure with typical steps: set-up of workstations, introduction to processes, agreed benefits, and provision of necessary resources. The orientation covers key policies, employee resources, benefits, and expectations.

Accurate documentation and compliance are critical to meeting regulatory and organizational standards. As such, we ensure that all new employees complete the necessary documentation, understand their compliance obligations, and have clear access to resources that address the aforementioned requirements.

Termination and Offboarding

The Company focuses on selecting the appropriate people with the hope that dismissals will not be necessary. The termination and offboarding process is handled with respect and professionalism, ensuring that employees who leave the Company receive appropriate support and resources. Poor attendance, lateness, idling, poor performance, serious cases of non-GMP or EH&S compliance and bad language are just some of the practices that will not be tolerated by the Company.

When an individual intends to submit their resignation, they are requested to write a resignation letter and send it to their manager, cc'ing the HR Department and HR in turn conducts the exit interview. Except for those cases which warrant summary dismissal, employees are entitled to give or receive the notice period specified in the relevant provisions of law. Further details on staff dismissal and offboarding process are available on the Employee Handbook.

Career Development

Our performance management system provides structured, valuable feedback and support. Through regular performance appraisals, employees receive constructive feedback on their strengths, areas for development, and gaps that helps align individual goals with organizational objectives.

Performance Management

Performance appraisals (upon which the bonus is based) are conducted annually to evaluate employee contributions and achievements, offering an opportunity for two-way feedback. This process encourages open dialogue between managers and employees, enabling them to discuss performance outcomes, identify gaps and areas for improvement, set future goals, and identify professional development opportunities.

Appraisal System

Pharos maintains a "Performance Appraisal System" - a targeted approach focusing on S.M.A.R.T. objectives and competency focus areas. This system serves specific purposes:

- ensures objectivity and transparency
- ensures a common approach regarding both individual goals and competency focus areas
- fosters interactive discussions about performance and experience (holistic annual review)
- fosters people motivation and engagement
- aligns with PharOS' corporate strategic goals
- contributes to continuous personal improvement via targeted competency focus areas

Additionally, PharOS maintains a "Performance Appraisal Form" that serves multiple purposes for both the Company and employees. It clarifies job responsibilities and performance expectations and equips employee with a roadmap for career development, outlining the skills and achievements required for progression. The "Performance Appraisal Form" is divided into Corporate Strategic Goals, Individual Objectives, Competency Focus Areas, Employee's Development Goals, and Career Aspirations and Interests.

Professional Development and Training

We are committed to facilitating career development from within whenever possible. We empower employees to take charge of their career paths, offer resources and guide for skill enhancement, advancement opportunities, and succession planning:

- To assist our employees in improving their performance, the Company implements various methods of support their work. The methods to be applied will be communicated in advance to those involved, covering all aspects (criteria and evaluation methods, etc.). The strengths and weaknesses in each employee's performance, as well as the overall results of the evaluation, will be communicated individually to each employee by their direct supervisor, who will also be entitled to provide feedback.
- Employees may receive a discretionary monetary reward based on their performance at the discretion of the Company. This provision can be revoked at any time without prior notice.

Our training and development programs are designed to equip employees with the skills and knowledge for both personal and professional growth. Through a variety of learning opportunities, we invest in our employees' development to enhance their capabilities and overall job satisfaction.

Work-related Trainings: Work-related Training is conducted by the Managers of the respective Department and cover both technical and job-specific skills.

Soft-skills Trainings: This type of Training - conducted by Human Resources Department - covers thematics related to Coaching, Leadership, and People Management. It focuses on the development of critical abilities (inter alia communication, negotiation, teamwork, critical thinking, and problem solving) and is addressed to managerial and senior level positions, where a cognitive-behavioral approach, apart from knowledge and technical skills, is required.

Managing Misconduct

PharOS is committed to conducting its business activities with integrity and always in compliance with applicable national and European legislation, the regulatory framework, Company's policies and procedures, the Code of Conduct, as well as any other code and policy that the Company implements and follows. Irregularities and deviations, as well as misconduct may occur in the workplace and are not in line with Company's commitments. As such, the Company shall provide its employees with the

necessary means of defense and protection against such incidents and behaviours, encouraging them to speak openly and make relevant reports and complaints.

Grievance and Complaint Procedure

Our grievance and complaint procedure provides a structured process for our employees to voice concerns or report issues in a safe and confidential manner. We are committed to addressing grievances promptly and fairly, ensuring that all employees have the opportunity to raise concerns without fear of retaliation.

The Company maintains a “Grievance Procedure”, according to which the following steps should be followed:

- If an individual have any problem within work, they should bring the matter to the attention of their immediate Supervisor / Manager
- Their Supervisor / Manager should address the matter and report back to them within a reasonable timeframe
- If their Supervisor / Manager fail to deal with the matter reported or if the matter concern the Supervisor, the individual may then raise the matter with the HR / Country Head

Additionally, PharOS maintains the “SpeakUP Service,” which aims to establish communication channels and set clear procedures for submitting and monitoring reports and complaints. This service operates 24 hours a day, 7 days a week and is accessible through an online process, a phone line, and email. The SpeakUP platform is accessible via the Company’s website. Further details, regarding the “SpeakUP Service” can be found at the “SpeakUP Procedure for Reporting an Incident of Violation of Law” document.

Disciplinary Procedures

Disciplinary procedures are established by the Company to address performance issues or misconduct in a fair and consistent manner. We emphasize a progressive discipline approach, focusing on communication, support, and opportunity for improvements, while also upholding PharOS’ ethical standards.

It is employees’ obligation to conduct themselves in a reasonable manner, to observe the rules and regulations applicable to them and to carry out their duties and the lawful orders of their superiors, whilst strictly abiding to the Company’ s conduct. In case an employee is charged with a disciplinary offense, the following procedure shall apply:

- The charge for an offense will be made within ten (10) working days from the discovery of the incident
- The charge will be discussed between the employee and the Department Manager / Supervisor
- The employee will have three (3) working days to provide their feedback and document it

If an incident is serious enough, the Company may suspend the employee for up to five (5) working days, while an investigation is conducted; if no charges are brought, the employee will be reinstated. Additionally, the Company reserves the right to terminate employment for employees convicted of serious criminal offenses, and all disciplinary actions will be recorded in the employee’s personal file, adhering to local labor laws. Further details on the “Disciplinary Procedure” are available on the Employee Handbook.

Employee Recognition and Rewards

We believe that recognizing and rewarding employees' contributions is vital to fostering engagement and motivation. Our employee recognition and rewards initiatives are designed to applaud and celebrate achievements, promote a positive working culture, and encourage individuals and teams to excel in their roles. Our employee recognition approach highlights outstanding performance and contributions across the Company. These initiatives are designed to acknowledge individual and team accomplishments, fostering a culture of appreciation.

The Bonus amount is determined each year based on specific criteria:

- Company's overall performance
- Achievements versus corporate strategic goals
- Overall employee's performance within the year and year-end rating
- Final bonus target amount

PharOS Annual Merit Increase Plan

The Plan aims to promote the Company's values and meritocracy and differentiate employees' rewards based on both organizational and individual performance. The Plan applies to all employees who are eligible to a merit increase every two (2) years, depending on their year-end performance. The objectives of the Plan are the following:

- Promote Company's values and meritocracy
- Differentiate employees' rewards based on both organizational and individual performance

PharOS Annual Incentive Plan

PharOS has a salary structure that establishes the value of each job according to the labor law and the market value. PharOS rewards good performance that adds value to the Company, by compensating its people in a fair manner, based on job responsibilities and employee's performance. The objectives of the Plan are the following:

- Promote Company's values and meritocracy
- Differentiate rewards based on both organizational and individual performance
- Facilitate long-term sustainable Company growth

Reference Program

PharOS Reference Program is a strategic initiative implemented to encourage employees to recommend qualified candidates for job openings, as well as a powerful tool for the Company to enhance its recruitment strategy. In this way, the Company leverages the networks of existing employees to identify potential hires, by offering important benefits.

Employee Wellness and Wellbeing

Employees' wellbeing is of utmost importance and it has been witnessed that it strengthens Company's resilience, enhances retention, and promotes work-life balance. We recognize the importance of health (mental, emotional, and physical) and overall wellness for employee productivity and satisfaction. Our mental health and wellness initiatives (indicatively, meals discount, online fitness program, workplace massage, employee psychological support, employee welfare program) promote a healthy work-life balance and foster a culture of understanding and support for mental well-being.

Communication Approach

Our communication approach provides a framework for effective and professional interactions within and outside the Company. By establishing clear guidelines, we aim to promote respectful and constructive dialogue, enhance collaboration, and ensure that communication reflects our core values and organizational standards.

Company announcements and instructions are communicated to employees, either by posting them on the Company's Board of Announcements (Noticeboard) or by sending relevant emails. When posted on the workplace board, it is assumed that announcements have been read by all employees working at that location. Similarly, when sent to employees via email, it is assumed that they have been read by the recipients.

Additionally, PharOS encourages open communication and proactive problem-solving, offering resources to resolve conflicts respectfully and fairly. If an individual has a work-related question or suggestion, the Company encourages them to initially discuss it with their manager. In case their manager cannot adequately address the situation or if they do not feel comfortable discussing it, they may contact the Human Resources Department.

Check-In Meetings

The Company fosters an "open-door" policy and in order to support this, it has established the "Check-In Meetings". Check-In Meetings are inter-departmental meetings - in the absence of the Head of each department, where the Head of HR Department is always present and takes the lead of the conversation. They are highly structured through a questionnaire, have a clear agenda, and aim to spark a conversation on the Company's achievements, great moments and areas of improvement. Support and promotion of equal opportunities and fair treatment are largely present at Check-In Meetings that are designed on the basis of transparency.

Social Media and Public Relations

Our social media and public relations policy sets guidelines for employees engaging with social media platforms in a professional capacity. We encourage responsible communication that aligns with our brand values, while reminding employees of their role as representatives of the Company when sharing content or engaging in discussions online.

Compliance with Labor Laws and Regulations

Compliance with legal requirements and regulations is essential to our Company's integrity and success. We are committed to upholding all applicable labor laws and regulations, ensuring that our practices align with legal standards to protect the rights of our employees and the Company. Additionally, compliance ensures that we operate within the legal framework, while promoting fair treatment for all employees. We continually monitor and update our policies and practices to remain compliant with evolving labor laws, safeguarding both the organization and our workforce.

Anti-Bribery and Anti-Corruption

Our "Anti-Bribery and Anti-Corruption Policy" reflects our commitment to ethical business practices and transparency. We maintain a zero-tolerance toward bribery and corruption, providing clear guidelines for acceptable conduct and promoting a culture of integrity in all our operations.

Whistleblowing

The “Whistleblowing Policy” encourages employees to report unethical behavior, misconduct, or violations of Company’s policies without fear of retaliation. We are committed to protecting whistleblowers and ensuring that all reports are handled confidentially and thoroughly investigated, reinforcing our dedication to ethical practices and accountability. The “SpeakUP service” is designed to support this goal.

Interaction with Other Policies and Procedures

The present HR Policy shall apply concurrently and serve as a supplement to the following corporate Policies and regulations currently in force; this interaction ensures a cohesive approach to HR throughout PharOS.

- Code of Conduct
- Anti-Bribery and Anti-Corruption Policy
- Anti-Violence and Anti-Harassment Policy
- Whistleblowing Policy
- Environmental, Health and Safety (EH&S) Policy
- PharOS Induction Presentation
- PharOS Annual Incentive Plan
- PharOS Annual Merit Increases Plan Guidelines
- Performance Appraisal Form
- SpeakUP Procedure
- PharOS Employee Handbook
- PharOS Internal Employee Regulations
- Privacy Policy
- GDPR Privacy Notice for employees, workers & contractors
- Data Protection Policy
- Information Security Policy

Monitoring and Review

PharOS’ Human Resources Department is responsible for ensuring that the latest version of the Human Resources Policy is published and is made available to all employees.

PharOS ensures that any material changes on the content of the Policy are to be notified to all interested parties.

The Policy undergoes annual reviews and changes in an ad hoc basis, when needed. Any review and / or amendment on the content of the current HR Policy is dependent to the following factors:

- Changes in local, state, or federal laws and regulations that affect employment practices
- Feedback from employees and Management on the effectiveness of existing policies
- Industry best practice and trends that necessitate updates to enhance organizational effectiveness
- Organizational growth and/or restructuring that may affect HR functions or employees’ needs
- Results from internal audits and/or assessments that identify gaps or areas for improvement
- Advancements in technology that may require new policies or revisions to existing guidelines
- Changes in organizational strategy or goals that align with employee engagement and retention efforts

The Company states that it regularly reviews and updates the HR Policy, in response to the above factors.

Contact

Any general queries or comments about the present HR Policy should be addressed to: Human Resources Department.

Should you require a status update, or need further information or clarifications upon the Policy, you may raise a request via e-mail to: hr@pharosgr.gr

The HR Policy comes into effect immediately upon approval by the decision of 31/10/2024 of PharOS.

Document Revision Information:

Version	Amendment	Date of Approval	Policy Approval Authority	Effective Date
1.0	Initial Issue	31/10/2024	Managing Directors	1/11/2024