

## 2. Labour conditions



**Principle #03**  
Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining

**Principle #04**  
the elimination of all forms of forced and compulsory labour;

**Principle #05**  
the effective abolition of child labour; and

**Principle #06**  
the elimination of discrimination in respect of employment and occupation.

### Fair employee treatment

One of our Group's primary objectives is to ensure ideal working conditions; this is achieved through the fair treatment of employees and the protection of the freedom of association. To this end, we take steps every day to foster a healthy environment that is based on honest dialogue and mutual respect.

We appreciate diversity, while we discourage and reject all kinds of discrimination. Our decisions on employment are based solely on business reasons and criteria, such as qualifications, talent, achievement, effectiveness and performance, while they are always taken according to the local and international labour laws. This allows us to build a fair work environment, attract and retain the most specialised employees and remain true to our Principles. Our Group has adopted and applies appropriate procedures to detect any training needs, while providing incentives to our employees to achieve maximum efficiency, as well as opportunities for development.



**Dr. Konstantinos Georgiadis**  
Group Human Resource Director



### Commitments and Policies

Our employees' rights and obligations derive from labour legislation, from the Group's Code of Business Conduct and from the personal labour agreements they sign.

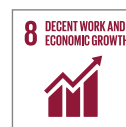
Our Group companies strictly adhere to the Code of Professional Ethics that stipulates that decisions on employment (from start to termination) shall be solely based on work-related factors, such as qualifications, achievements, effectiveness, and performance.

Moreover, to achieve the best possible work environment, the Code of Business Conduct ensures the proper utilization of personnel with emphasis on training and personal progress, while also describing the rules of conduct between employees and analysing the policies on Remuneration and Benefits.

Aiming to the best possible application of our policies, we arrange training sessions that include topics related to human rights, such as discrimination and ways to address it, while at the same time we have established a special grievance mechanism for Policy violation incidents. In addition, we have set up a special Health & Safety Committee, which represents all of our employees, aiming to allow the timely discussion of any issue of concern with senior management.



## 2.1 Freedom of association and collective bargaining



### Our approach

The Group is committed to recognize employees' rights to freedom of association and collective bargaining. In this context, all employees have the right to elect and be elected in the Health & Safety Committee, which they can contact in order to discuss any matter of concern. This Committee represents the employees and is responsible for arranging regular meetings with the Group's senior management, with the purpose of communicating and negotiating any issues of concern for our employees.

### Our performance

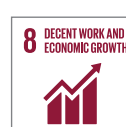
GRI 419-1

During the reporting period (2014-2016), no fines were imposed and there was no litigation concerning collective bargaining and freedom of association issues.

## 2.3 Abolition of child labour



## 2.2 Elimination of forced or compulsory labour



### Our approach

Our Group commits to comply with legislation and eliminate all forms of forced or compulsory labour. To this end, the Code of Ethics places emphasis on respecting the law and the integrity of each individual person. In addition, our Employee Code of Conduct protects employment relations and makes sure that labour laws prevail.

### Our performance

During the reporting period, no cases of forced or compulsory labour concerning the Group's activities, have taken place.

### Our approach

Our Group, through its Code of Professional Ethics, expressly prohibits child labour and complies with the respective legislation. As a result of our approach, the Group companies do not employ persons under the statutory age limit. We aim to see this commitment of ours, getting also adopted by our direct and indirect partners.

### Our performance

During the reporting period and for the duration of our Group's operation, there have not been any cases of child labour concerning the Groups' activities.

## 2.4 Non-discrimination in employment



### Our approach

We discourage and reject any kind of discrimination based on origin, nationality, the colour of the skin, religion, age, gender, family status, health, sexual preferences, or any beliefs.

We are all required to show integrity in our interactions with other employees and external bodies, to report on any concerns and demonstrate zero tolerance to any kind of abusive discrimination.

In addition, in the interviews held with prospect employees, we apply policies against discrimination. Even though these policies are not recorded, all responsible for the recruitment procedures follow strict orders by Management and impartially decide about who is more suitable to work for our Group.

Should we become aware of any discriminatory activity in our Group, we must report this to the Human Resources Department (compliance@sunlight.gr) or to the Compliance Officer.

### Communication and Training Sessions

Within the context of the two-day training session on Compliance, held at the end of 2014, for all senior executives of our company, special mention was made to the importance of communication between employees regarding discrimination issues and on the methods for addressing them.

### Our performance

#### Indicators

The following have been observed during the reporting period (2014 – 2016):

- > Sharp increase of new employee hires belonging to religious minorities (Komotini, Xanthi).
- > Increase progression rates to administrative positions for colleagues belonging to religious minorities (Komotini, Xanthi).

|   | 2014 | 2015 | 2016 |
|---|------|------|------|
| Employees in religious minorities - Foremen | -    | 1    | 2    |
| Employees from religious minorities hired   | 36   | 43   | 46   |

- > Small percentage of women in the factories. This is due to the increased protection of women from exposure to a lead environment, since this could cause problems to pregnant women.

GRI 406-1

#### Discrimination incidents

During the reporting period (2014-2016) no discrimination incident was recorded in our Group.