



MOBIAK S.A. Policy Against Child Labor, Human Trafficking & Forced Labor

1st edition - December 2025

1. Purpose

MOBIAK S.A. is committed to conducting its business ethically, responsibly, and in full compliance with applicable Greek and European Union legislation. This Policy establishes MOBIAK's zero-tolerance approach to child labor, human trafficking, and all forms of forced or compulsory labor within its own operations and throughout its supply chain.

2. Scope of Application

This Policy applies to:

- All MOBIAK S.A. employees, managers, and members of the Board of Directors
- All subsidiaries and affiliated companies
- All suppliers, contractors, subcontractors, agents, and business partners acting on behalf of MOBIAK S.A.

Compliance with this Policy is a prerequisite for any business relationship with MOBIAK S.A..

3. Legal and Regulatory Framework

MOBIAK S.A. operates in accordance with, and commits to comply with, all applicable national and international laws and standards, including but not limited to:

Greek Legislation

- Greek Constitution (Article 22 – Protection of labor)
- Law 4808/2021 on the protection of labor and prevention of exploitation
- Law 4198/2013 on the prevention and combating of human trafficking and protection of victims
- Law 4554/2018 on labor inspection and undeclared work

European Union Legislation

- Charter of Fundamental Rights of the European Union
- Directive 2011/36/EU on preventing and combating trafficking in human beings
- Directive 94/33/EC on the protection of young people at work
- Regulation (EU) 2019/1020 and related supply-chain compliance obligations
- Corporate Sustainability Due Diligence and Reporting principles

International Standards

- United Nations Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- International Labour Organization (ILO) Conventions No. 29, 105, 138, and 182

4. Definitions

- Child Labor: Any work performed by a person below the minimum legal working age as defined by Greek law and ILO Convention No. 138.
- Forced or Compulsory Labor: Any work or service exacted from a person under the threat of penalty and for which the person has not offered themselves voluntarily.
- Human Trafficking: The recruitment, transportation, transfer, harboring, or receipt of persons by means of threat, force, coercion, abduction, fraud, or abuse of power for the purpose of exploitation.

5. Policy Commitments

MOBIAK S.A. explicitly commits to:

- Prohibit and prevent child labor in all business activities
- Reject all forms of forced, bonded, or involuntary labor
- Prohibit human trafficking and exploitation in any form
- Respect human dignity, freedom, and equal opportunity
- Provide safe, lawful, and fair working conditions

6. Employment Practices

MOBIAK S.A. ensures that:

- All employees meet the minimum legal working age
- Employment is freely chosen and based on written contracts
- No employee is required to surrender identification documents, passports, or work permits
- Wages, working hours, and benefits comply with applicable laws and collective agreements
- Employees have the right to freedom of movement, association, and lawful termination of employment

7. Supply Chain and Business Partners

MOBIAK S.A. expects all suppliers and partners to:

- Comply with all applicable labor, human rights, and anti-trafficking laws
- Prohibit child labor, forced labor, and human trafficking in their operations
- Maintain verifiable employment records
- Allow audits, inspections, and assessments when requested

MOBIAK S.A. reserves the right to suspend or terminate cooperation with any partner found to be in violation of this Policy.

8. Due Diligence and Risk Management

MOBIAK S.A. implements reasonable due diligence measures, including:

- Risk assessment of suppliers and regions
- Supplier declarations and contractual clauses
- Monitoring and auditing procedures
- Corrective action plans where risks are identified

9. Reporting and Whistleblowing

MOBIAK S.A. encourages employees and external stakeholders to report any suspected violations of this Policy.

Reports may be made:

- Confidentially
- Without fear of retaliation
- Through internal reporting channels or designated compliance officers

All reports will be investigated promptly and appropriately.

10. Training and Awareness

MOBIAK S.A. provides regular training and awareness programs for employees and relevant stakeholders to ensure understanding and effective implementation of this Policy.

11. Violations and Disciplinary Measures

Any violation of this Policy may result in:

- Disciplinary action, up to and including termination of employment
- Termination of contracts with suppliers or partners
- Legal action where required by law

12. Governance and Review

This Policy is approved by MOBIAK S.A.'s Management and reviewed periodically to ensure ongoing compliance with legal requirements and best practices.

13. Entry into Force

This Policy enters into force on the date of approval and is publicly available to all stakeholders.

Approved by: Management of MOBIAK S.A.

Effective Date: