

Human Rights Policy



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CONTENTS

INTRODUCTION	3
PURPOSE	3
APPLICATION	3
LAWS AND MORAL STANDARDS	3
HUMAN RIGHTS AND FAIRWORKPLACE PRACTICES	4
1. WORKING CONDITIONS	4
• Payment	4
• Hiring	4
• Timetable	4
• Leaves of absence and other provisions	4
2. FREEDOM OF ASSEMBLY AND COLLECTIVE NEGOTIATIONS	4
3. FORCED LABOR	5
4. SUPPLIERS	5
5. TRAINING	5
6. CHILD LABOR	5
7. DIVERSITY	5
8. HEALTH AND SECURITY	6
9. PERSONAL DATA PROTECTION	6
10. LOCAL COMMUNITY	6
11. SUPPLIERS - PARTNERS	6
12. ENVIRONMENT	7
13. PRODUCT MANAGEMENT	7
14. COMMUNICATIONS	7
15. PROTEST AND COMPLAINTS MECHANISM	7
16. ROLES AND RESPONSIBILITIES	8
17. APPLICATION AND AMENDMENT	8

Date 14/10/2022

INTRODUCTION

Bright Special Lighting S.A. consider Human Rights as a substantial issue of viable development for our Company.

The current Human Rights Policy establishes a framework for the promotion of respect and protection of Human Rights within the Company and its circle of influence.

This policy is frequently revisited so that it remains compatible with national and international developments and is amended every time it is considered necessary.

PURPOSE

Purpose of the current policy is the commitment of **Bright Special Lighting S.A.** to the respect and protection of all categories of Human Rights, both for the Company (employees) and for the company's social partners (suppliers, associates) and local communities where the Company is active, by fortifying and securing its reputation as a diligent corporate unit.

APPLICATION

The current policy applies to all of Company's installations, those outside Attica included.

The current policy is binding for the members of the Board of Directors, those who are in charge of every installation and all the personnel employed by the Company.

The current policy is binding for all suppliers that are collaborating with the Company.

LAWS AND MORAL STANDARDS

Sources of the current policy are the U.N. Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Cultural and Human Rights.

In case a violation of human rights is detected, the Company is committed for immediate corrective actions and the restitution of the implications, if any, by the violation.

The policy is frequently revisited so that it remains compatible with national and international developments and may be amended if this is considered necessary.

HUMAN RIGHTS AND FAIRWORKPLACE PRACTICES

1. WORKING CONDITIONS

➤ Salaries

- The company fully complies with the minimum wage legislation while the salaries are determined by objective factors.
- All employees receive equal payment for equal work, independently of race, sex, color, nationality or ethnic origin, class, religion, age, inabilities, family status, sexual orientation, gender identity, political and cultural beliefs.
- All employees are paid on time via their bank account.
- Salary, overtimes, bonuses, legal deductions are made known to the employees.
- The Company strongly opposes to any king of illegal labor.
- The Company compensates the employee in case of dismissal or resignation, according to the current legislation.

➤ Hiring

Before starting to work with the Company, employees are informed about terms and conditions of their employment as well as their right and obligations according to the current legislation.

➤ Timetable

- The Company fully complies with the current legislation for working hours, overtime employment, breaks and time offs.
- A suitable space for breaks during worktime is accessible to the employees.

➤ Leaves of absence and other provisions

- The Company fully complies with the labor legislation requirements concerning leaves of absence (i.e. parental leave, annual leave, marriage leave)
- In additions to the above, the Company provides food stamps to the employees.

2. FREEDOM OF ASSEMBLY AND COLLECTIVE NEGOTIATIONS

- The Company fully complies with the legislation requirements concerning the right of assembly and collective negotiations as well as
- Reassures those employees participating in labor unions, do not confront intimidation or harassment of any kind and finally
- Is committed to the development of constructive dialogue with the legally elected representatives of employees, with mutual respect and good faith.

3. FORCED LABOR

- The company forbids the use of any kind of forced labor, including labor of incarcerated, labor under especially oppressive terms, slave labor and any form of trafficking.
- The Company under no circumstances withholds personal travelling documents or id cards or any personal item. Original employee's documents are used by the Company only when it is required by the law for the registration, by local or national authorities. These documents are returned to the employees after the procedure is complete.
- Employees can at any time and freely terminate their employment, after a prompt notification, without any cost.

4. SUPPLIERS

The acceptance of and compliance to the principles and requirements of this policy constitutes an obligatory contact term for all the Company's suppliers, associates and subcontractors.

5. TRAINING

Bright Special Lighting S.A. provides all the necessary resources so that all employees as well as suppliers' and associates' employees, employed at Company's projects and activities participate in educational activities.

6. CHILD LABOR

- The company does not employ children under the minimum age required by Law.
- The company does not employ children under the age of compulsory education.
- The company does not employ minors (under 18 years old) for duties in dangerous environment (such as working in heights, limited space etc) or night shifts or duties not contributing to the development of the employee.

7. DIVERSITY

- The company offers equal opportunities during hiring as well as deployment and education of employees. Any kind of discrimination based on race, gender, color, nationality or ethnic origin, class, religion, age, inability, family status, sexual orientation or gender identity, political and cultural beliefs or any other category protected by law, is not tolerated.
- The company does not tolerate any form of physical, verbal, sexual or psychological harassment or violence, as well as threats and intimidation at work.

8. HEALTH AND SECURITY

- The company is certified for ISO 45001:2018 and possesses the necessary certificate.
- The company has in effect a Health and Security policy at work that covers all employees that are employed at its activities, including the employees of its suppliers, associates, and subcontractors.
- At the beginning of their employment, all employees are informed about basic safety and health rules as well as the dangers and security measures concerning their work.
- All employees are systematically briefed on issues concerning health and safety at work.
- All employees are equipped with the appropriate means of protection for each assigned duty.
- All employees have access to appropriate resting, hygiene and first aid spaces.
- The company employs an occupational doctor for all employees.
- The company implements reporting and monitoring procedures concerning accidents at work and occupational related diseases at workplace that also apply to the employees of its suppliers and associates.

9. PERSONAL DATA PROTECTION

Bright Special Lighting SA is taking all necessary technical and organizational measures to secure (a) confidentiality, security and protection of personal data of its employees and to avert deterioration, damage, loss and destruction as well as accessibility by non-certified third parties and (b) effective exercise of their rights against the process of employees' personal data, according to the GDPR (EU 2016/679) and the corporate policy of Data Protection.

10. LOCAL COMMUNITY

- The company is committed to developing activities and materializing projects with respect to the rights of local communities, where it is active.
- The company maintains an open communication line with local communities where it is active and consults with delegates of local communities about the prevention and mitigation of possible effects deriving from its activities.
- The Company is committed to abide by the principles and actions of Corporate Responsibility and is certified with ISO 26000:2010 for that, possessing the equivalent certificate.

11. SUPPLIERS - PARTNERS

The Suppliers - Associates comply with all the relevant laws and regulations for commerce and imports, including sanctions and prohibitions applicable on their activities.

12. ENVIRONMENT

- The company complies with all relevant environmental and energy efficiency laws, regulations and standards (ISO 14001:2015), (ISO 50001:2018) and implements an effective system of detection and neutralization of possible environmental and energy hazards.
- We expect from our corporate partners an effort to support the goals of environmental protection of Bright Special Lighting SA through their provided products and services. In this framework, we also expect from our suppliers to consider climate protection in their activities, by setting goals and trying to achieve them.

13. PRODUCT MANAGEMENT

- The company complies with relevant national laws, international guidelines and standards concerning the design, the production and trade of its products and services.
- If education or other measures for safe use of its products is required, the company commits that all necessary action is taken so that end users are aware of these requirements.

14. COMMUNICATIONS

Our zero-tolerance approach for violations of human rights is made known at the beginning of the cooperation with each supplier, contractor, representative and business partner, and at any time it is deemed necessary.

15. PROTEST AND COMPLAINTS MECHANISM

- Every employee, supplier, customer, or any other interested party, can file a complaint or report issues concerning the implementation of Ethics Code, namely or anonymously, by:
 - Sending e – mail at gvasiliou@bright.gr
 - Sending mail at
Bright Special Lighting
Kephalovrysou 5 street, Monomati, Acharnai,
13677 Acharnai,
Attention of Quality and Corporate Social Responsibility Department, with the indication “Confidential”.
- At the same time, the company is committed to investigate and deal with employees’ concerns as well as the resolution of protests by taking corrective actions without taking any action against any employee that reports in good faith any real or alleged misconduct.

16. ROLES AND RESPONSIBILITIES

- The Quality and Corporate Social Responsibility Department in coordination with the Human Resources Department oversees and studies the effectiveness and implementation of the abovementioned policy.

17. APPLICATION AND AMENDMENT

General Human Resources Department, General Direction and Quality and Corporate Social Responsibility Department are cooperating for the drafting and furthermore amendment of this policy, which is uploaded updated on the company's website.