

POLICY FOR PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK

1. The Company, demonstrating zero tolerance to incidents of violence and harassment in the workplace, adopts this policy in compliance with Articles 9 and 10 of Law 4808/2021, which ratified the International Labour Convention 190/21.06.2021 of the International Labour Organization (ILO) on the elimination of violence and harassment at work. The present policy of the Company is hereafter applicable in parallel with the above mentioned provisions on the one hand, and on the other hand, with the provisions of the document **"POLICY FOR PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK AND TREATING AND ADDRESSING INTERNAL COMPLAINTS FOR INCIDENTS OF VIOLENCE AND HARASSMENT"** posted on the Company's website at the link <https://www.ekme.gr/content/EKME-HARASSMENT-POLICY.pdf>.

2. The aim of this policy is to create and consolidate a working environment that respects, promotes and safeguards human dignity and the right of every person to a workplace free from violence and harassment. The Company recognizes and respects the right of every employee to a work environment free of violence and harassment and will not tolerate any such behaviour, in any form, by any person. Integrity and respect for all contribute to our success, are vital to our success and are an integral part of our corporate environment.

3. The scope of this policy includes all types of personnel associated with the Company: with a dependent employment contract (indefinite or fixed-term, full-time or part-time), with a project contract, personnel seconded from an EU member state or personnel from third countries, with an independent services contract, with a paid mandate, with an apprenticeship contract, with a loan contract, employed through third-party service providers, volunteers, job applicants, persons whose employment relationship with the Company has ended.

4. Prohibited forms of behaviour:

a. Violence and harassment: It means any form of conduct, acts, practices or threats thereof, intended to cause, resulting in or likely to result in physical, psychological, sexual or economic harm, whether occurring on one occasion or repeatedly.

b. Harassment: This includes forms of conduct which have the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not they constitute a form of discrimination, and includes harassment on grounds of gender or other grounds of discrimination.

c. Harassment on grounds of gender: This means forms of conduct related to the gender of a person which have the purpose or effect of violating the dignity of that person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of conduct include the sexual harassment of Law 3896/2010, as well as forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics.

d. What constitutes an indicative incident of violence and harassment: Intended or actual physical violence

Intimidation, oppression, persecution

Aggressive or threatening behaviour that causes reasonable fear

Verbal hostility

Unveiled threats

Threats related to the job and working conditions

Offensive comments or jokes that are about another person

Arrogant, derogatory and demeaning comments

Retaliatory acts

Domestic violence transmitted in the workplace. Domestic violence carried out in the workplace, for example, through physical violence, sexual harassment and stalking by current or former partners, is a serious form of workplace violence. Acts of domestic violence, including stalking or tailing, can also be committed by people in the same work environment with whom they have (or have had in the past) a close relationship. Domestic violence, in any of the above forms, inflicted on the worker during remote working.

Sexual comments, jokes, gestures

Unethical and/or offensive comments about gender or sexual orientation

Indiscriminate questions about personal or sex life

Sexual innuendo

Invitations for dating or sexual intercourse

Unwanted touching, whistling, caressing, kissing

Persistent or lustful looks

Sending erotic or sexual messages (by phone or e-mail)

e. What does NOT constitute an incident of violence and harassment:

Direct employee supervision, including setting performance expectations

Taking steps to correct performance, such as putting an employee on a performance improvement plan

Delegation of tasks and guidance on how and when to do them

Request for updates or progress reports

The approval or refusal of a leave

Request for documentation of absence for health reasons based on the applicable provisions

The moral and/or financial reward for excellent performance of an employee

Providing constructive feedback on the performance of the work

5. The Company takes all appropriate and necessary measures in order to prevent, on the one hand, and to deal with and manage such incidents and forms of behaviour, on the other hand. More specifically, the Company: Provides information and appropriate training to its employees on how to deal with incidents of violence and harassment, how to manage them, their responsibilities and rights. Cooperates with the relevant Occupational Physician to adopt measures to prevent incidents of violence and harassment in the workplace. Supervises the implementation of this policy and take action against employees who do not comply, imposing the necessary and appropriate sanctions in the event that any employee, customer, visitor or supervisor is found to have engaged in a prohibited form of behaviour.

6. a. **Every worker is entitled to:**

Be treated with respect and courtesy

Not be subjected to violent behaviour, harassment, including sexual and gender-based violence, discrimination and intimidation

Report any incident of prohibited conduct in the workplace (in accordance with this policy, as detailed below), without being victimised or suffering any other adverse consequence or retaliation

b. **Every employee is obliged to:**

Comply with this policy and all applicable and valid procedures in order to protect his/her personal safety and that of other employees of the company

Immediately report any incident of violence and harassment to his/her supervisor

Cooperate in the investigation of any complaint that may have been lodged in accordance with the procedure below

Participate in the Company's actions and training programs regarding incidents of violence and harassment

7. **Complaints and their management:** Any employee against whom any incident of violence and harassment has occurred may submit an oral or written complaint to the member of the Board of Directors of the Company, Mr. Konstantinos Ilias, father's name Dimitrios, also referred to as the "Reporting Officer", for this policy. The complaint may be submitted in person or by e-mail, in particular to the following e-mail address: kilias@ekme.gr. The complaint cannot be made anonymously. The complaint should include the details of the suspected person, i.e. the person who has engaged in a form of prohibited conduct, as well as the specific incident(s) that substantiate it. The Reporting Officer thoroughly investigates each complaint and collects any information necessary in relation to it. Complaints and investigations remain strictly confidential to the maximum extent possible, taking into account the sensitivity of the case and the confidentiality of all parties involved. In particular, the Reporting Officer may talk to the complainant and the suspected person, examine witnesses, request the production of any documents that may exist which prove that any incident of violence and harassment did or did not take place and contact the heads of each department, in case the complainant has addressed them. When the Reporting Officer completes his/her investigation, he/she submits a written report to the Company's Management, in which he/she states the result of the investigation. The results of the investigation shall be communicated in parallel to both the complainant and the suspected person, so that they may take note of them. The completion of the investigation and the submission of the findings to the Company's Management, as well as its notification to the complainant and the suspected person, must take place as soon as possible and in any case not later than 3 weeks from the date of submission of the complaint by the complainant. In the event that an incident of violence and harassment actually occurs, the company's management will take all necessary, appropriate and proportionate measures against the suspected person, as the case may be. These measures may include, but are not limited to: (a) the recommendation of compliance; (b) the change of the employee's job, working hours, place and manner of work; (c) the termination of the employment contract or cooperation with the company. The Reporting Officer is required to act in an objective and impartial manner during the complaint investigation process. In addition, he/she must behave with respect to all parties involved and in a confidential and discreet manner. The publication or disclosure to non-parties of information relating to the complaint under consideration is completely prohibited. The above obligations are also borne by the Company's Management at the final stage of taking measures and decisions. Retaliation and victimisation of the complainant, who, as an affected person, has asserted his or her rights and submitted a written complaint about an incident of violence and harassment, is prohibited. Retaliation and victimisation of the complainant is a serious breach of this policy and will result in consequences for the person who acts in this way. In case the affected person has made a complaint of the incident of violence and harassment before any administrative or judicial authority, the Company shall provide any necessary assistance and help, as well as any information that may be available, to these competent authorities.

Annex - External Information Sources of Pan-Hellenic Scope

Contact details of the competent authorities

Labour Inspectorate (SEPE) complaints hotline

- Call the **1555** citizen helpline (open 24/7)

Hellenic Police

- Call **100** (works 24/7)

Domestic violence

- Call **100** (works 24/7)
- If you can't talk, send an SMS to 100.
- For more information, visit the following website of the Hellenic Police on domestic violence

http://www.astynomia.gr/index.php?option=ozo_content&perform=view&id=2030&Itemid=421&lang

- Call 15900 (open 24/7)

General Secretariat for Demographic and Family Policy and Gender Equality (GSGE):

- Call **15900** (open 24/7)
- If you cannot speak, please send an e-mail to sos15900@isotita.gr

Useful Websites

- <https://isotita.gr>
- <http://womensos.gr>