

Internal Complaints Management Policy

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1. Introduction

1.1 Purpose

This Policy (the "Policy") sets out the general principles and operational framework under which EVOIKI ZYMI ABEE (hereinafter referred to as "the company") receives, assesses and investigates reports of violence and harassment in the workplace.

The Company adopts and implements this Policy.

The company adopts the Policy in accordance with the principle of proportionality and taking into account its size, legal form, nature and the nature of its activities

The Policy and any amendments thereto are proposed by the Human Resources Department and approved by the company's management.

The company is committed to maintaining the highest standards of ethical and professional conduct, adopting a zero-tolerance policy towards illegal activities or actions that may adversely affect its reputation and credibility.

1.2 Regulatory Framework

The Internal Complaints Management Policy (hereinafter referred to as "the Policy") complies with the requirements of the regulatory framework, as defined in Law 4808/2021 "Labour Protection" and Ministerial Decisions 820//2021 (MD 82063 Government Gazette B 5059 2021) of the Minister of Labour

1.3 Definitions

For the purposes of this Policy, the following definitions apply:

"Report/complaint" is the verbal or written communication of information regarding violations or concerns submitted in relation to an actual or potential violation of the regulatory framework.

"Whistleblower" is the natural person who reports or discloses information about work-related violations.

"Respondent" means the person against whom an allegation of a violation has been made and to whom the irregularity is attributed or with whom that person is associated.

"Retaliation" is any direct or indirect act or omission occurring in a work-related context that causes or may cause unjustified harm to the whistleblower and may include, but is not necessarily limited to, harassment, discriminatory treatment, inappropriate performance evaluation, salary freeze or adjustment, work assignments, demotion, termination of employment contract.

"Feedback" is the provision of information to the complainant regarding the relevant report.

"Violation" is an act or omission that is illegal and relates to an act and areas that fall within the scope of the Policy.

"Good faith" is the unquestionable belief in the veracity of the reported circumstances, i.e. the fact that the reporter/complainant reasonably believes that the information provided is true, based on reasonable facts and/or circumstances that allow the assumption that the report is sufficiently substantiated.

"Violence and harassment" means forms of behaviour, acts, practices or threats thereof, which aim at, lead to or are likely to lead to physical, psychological, sexual or economic harm, whether occurring on a single occasion or repeatedly.

"Harassment" means any form of behaviour that has the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment on grounds of sex or other grounds of discrimination.

"Sexual harassment" means any form of behaviour related to a person's sex which has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, degrading or aggressive environment, as defined in Article 2 of Law 3896/2010 and paragraph 2 of Article 2 of Law 4443/2016. These forms of behaviour include sexual harassment under Law 3896/2010, as well as forms of behaviour related to a person's sexual orientation, expression, identity or gender characteristics.

For the purposes of applying this law, forms of violent behaviour and harassment against the persons referred to in Article 3 of Law 4808/2021 may take place in particular: (a) in the workplace, including public and private spaces and spaces where the employee performs work, receives remuneration, takes breaks, in particular for rest or meals, in personal hygiene and care facilities, changing rooms or accommodation provided by the employer, (b) during travel to and from work, other travel, travel, training, as well as events and social activities related to work, and (c) during communications related to work, including those carried out through information and communication technologies.

1.4 Scope and obligations

The procedures for managing internal complaints apply to all company employees, as well as to all interested parties related to the company.

2. General Principles

The Policy is a means of ensuring a peaceful working environment where employees can report incidents of violence and harassment at work with clarity and confidence.

The Policy aims to ensure an environment of trust and safety for Employees and encourages them to report, in good faith, any illegal acts of violence and harassment that come to their attention.

A fundamental principle of the Policy is to protect the confidentiality of information and the privacy of the complainant's personal data.

The reporting process aims to enhance transparency and encourages the reporting of incidents that lead to violations of company procedures and policies, as well as incidents of violence and harassment.

3. Scope of reports

Reports are submitted on the condition that there is a good faith and reasonable belief that a violation or misconduct has occurred. Company employees are encouraged to report the following cases of violence and harassment:

- forms of behaviour, acts, practices or threats thereof, which aim at, lead to or may lead to physical, psychological, sexual or economic harm, whether manifested individually or repeatedly.
 - forms of behaviour that have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or aggressive environment, regardless of whether it constitutes a form of discrimination, and includes harassment on the grounds of sex or other grounds of discrimination.
 - forms of behaviour related to a person's gender, which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, degrading or aggressive environment, as defined in Article 2 of Law 3896/2010 (A' 107) and paragraph 2 of Article 2 of Law 4443/2016 (A' 232). These forms of behaviour include sexual harassment under Law 3896/2010, as well as forms of behaviour related to the sexual orientation, expression, identity or gender characteristics of the person.

4. Submission of reports

Reports may be submitted by telephone, in writing or by e-mail to the reporting person referred to in Article 9 of Law 4808/2021. Reports may also be submitted in person between the complainant and the reporting officer referred to in Article 9 of Law 4808/2021.

In all cases, good faith regarding the legitimacy of a report is a prerequisite for its valid submission. Reporters will be protected from retaliation. The identity of the whistleblower, if they have chosen not to be anonymous, will be protected and the confidentiality of the information will be ensured. Submitted reports are only shared with pre-determined individuals (the reporting person referred to in Article 9 of Law 4808/2021 and the investigation committee, management). The reporting person then authorises the investigation committee to conduct the investigation, which has the right to act at its discretion to verify the allegations, while observing the principles of confidentiality. The company ensures that the complainant is adequately protected from possible negative consequences, such as threats or attempts at retaliation, or discrimination or any other form of unlawful action in accordance with Article 13 of Law 4808/2021. In particular, when the report relates to the complainant's superior, the investigation cannot be conducted by the superior. In any case, the company ensures that the complainant is fully protected from possible negative consequences if the assessment of the report and the relevant investigation do not reveal any violation.

The disclosure of the complainant's identity may be required by a judicial or other authority in the context of an investigation into the case in question. To this end, the complainant shall be informed before his or her identity is disclosed, unless such information would jeopardise the relevant investigations or judicial proceedings. When informing the complainant, the company shall provide an explanation for the disclosure of the relevant confidential data. The company shall take all necessary technical and organisational measures to protect personal data. The personal data of the parties involved shall be protected and processed solely for the purpose of verifying their validity. The company maintains an electronic file, with the necessary security specifications, which includes all submitted reports and the corresponding documentation.

The investigation committee consists of the following individuals: 1. Nikos Konstantakis, 2. Despoina Konstantinidou, 3. Dimitris Flokos.

The investigation committee informs the complainant of their right, at any stage of the procedure followed within the company, to also submit a complaint to the competent administrative authorities within their jurisdiction (Labour Inspectorate and Ombudsman) as well as to the judicial authorities, at their discretion.

In any case, the investigation and examination of complaints is carried out impartially and with protection of the confidentiality and personal data of the victims and the accused.

The company and every competent member of the committee undertake to receive and not to obstruct the receipt, to investigate and manage immediately any such complaint, to investigate and examine the allegations impartially and with respect for human dignity, and to take immediate measures to protect the affected party.

In any case, the above persons are committed to maintaining confidentiality and protecting Personal Data (PD) collected in the course of performing the above duties.

5. Investigation committee and related procedures

1. Governance

The Investigation Committee is responsible for evaluating and handling reports and submitting proposals and measures where it deems necessary.

2. Receipt of reports

In order to facilitate the proper examination and evaluation of reports submitted, complainants are encouraged to provide all available information, including the facts that gave rise to the event related to the report, noting the date and nature of the event, the name(s) of the person(s) involved, the person(s) involved, as well as any potential witnesses or other evidence, including relevant documents.

Reports can be submitted either by telephone to the following dedicated number: or by telephone to: 2221170253, or by sending an e-mail to the following address: hr@evoiki-zimi.gr or by post to the contact person referred to in Article 9 of Law 4808/2021, in Kastella, Evia, 14 KM E.O. CHALKIDAS – Aidipsos, Postal Code 344 00, for the attention of Mr. Stefanos Emmanouilidis.

These channels operate exclusively for the receipt of reports and are available 24 hours a day, seven days a week.

At the request of the complainant, the report may also be submitted through a physical meeting with a member of the Committee. In this case, the Committee ensures that, subject to the complainant's consent, the conversation is recorded.

The company appoints Mr. Stefanos Emmanouilidis as the contact person responsible for guiding and informing employees on the prevention and handling of violence and harassment at work. Stefanos Emmanouilidis, whose contact details are as above.

The role of the contact person is informative: it consists of guiding and informing employees, regardless of whether they are addressing him in connection with an incident or complaint of violence and harassment or not. Employees should have easy and direct access to the contact person, and the means/channels of communication with him/her are provided for above.

In any case, it is the responsibility of the above person to protect Personal Data (PD), which may come to their knowledge in the course of their duties.

3. Handling of reports

According to paragraph 2 of Article 12 of Law 4808/2021, when an employee or other person employed in another capacity violates the prohibition of violence and harassment under Article 4 of the same law, the employer is obliged to take the necessary and appropriate measures, as the case may be, against the accused, in order to prevent and avoid the recurrence of similar incidents or behaviour. These measures may include a compliance recommendation, a change of position, working hours, place or manner of work, or termination of the employment or cooperation relationship, without prejudice to the prohibition of abuse of rights under Article 281 of the Civil Code.

The procedure for handling complaints includes the following steps:

- When a complaint is submitted to the reporting person, they immediately forward it to the investigation committee, which investigates and decides whether the report contains irregularities, omissions or violations of the institutional framework.

The Committee then decides whether to close the case or inform the company's management of the violations found.

- When an employee is found to be in violation of the company's Internal Regulations and Policies, the Investigation Committee recommends corrective measures to the Management.

- The contact person monitors the above and handles communication with the complainant and, if necessary, requests further information and updates on the progress of their report.

- If the report has been submitted under a real name, the reporting person confirms receipt of the report within seven (7) days of its submission.

- Upon completion of the case, the reporting person informs the complainant of the decision taken in the Commission's report. Feedback to the complainant will be provided no later than three (3) months after the case is closed.

4. Final provisions – approval, review and update

Under the responsibility of the Human Resources Department, the Internal Complaints Management Policy will be communicated to Employees and posted on the company's website in a separate, easily recognisable and accessible section. The information shall include the procedures applicable to reporting a case, including the template and the manner in which the company may request the complainant to clarify details of the report or to provide additional information, the timeline for providing comments and the type and content of such comments, as well as the nature of the follow-up on reports.

The Human Resources Department is responsible for evaluating and reviewing the Policy annually.