

**Policy on preventing and combating
violence and harassment and on handling
internal complaints**



Table of Contents

1. Introduction.....	4
2. Definitions	5
3. Scope	5
4. Assessment of the risks of violence and harassment at work	6
5. Risk assessment methodology	6
6. Measures for the prevention, control and reduction of risks	7
7. Information on the rights and obligations of victims of violence and harassment	9
8. Submission of reports/complaints – Appointment of a "liaison officer"	10
9. Internal complaint management policy	10
10. Employment protection – Protection of victims of domestic violence.....	12
11. Persons responsible for compliance with the policy.....	12
12. Specific issues	13
13. Company – Appendix.....	14

1. Introduction

1. EVOIKI ZYMI S.A. (hereinafter referred to as the Company) complies with all measures and obligations relating to the implementation of the provisions of Part II of Law 4808/2021 on the prevention and combating of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

2. The purpose of this policy is to create and establish a working environment that respects, promotes and ensures human dignity and acts to prevent and combat all forms of discrimination based on personal characteristics and choices, as well as any form of violence and harassment that occurs during work or is related to or arises from it.

3. The Company declares that it recognises and respects the right of every employee to a working environment free from violence and harassment and that it does not tolerate any such behaviour, in any form, from any person.

4. Harassment may take the form of verbal, physical, visual or other content, or a combination of the above. By way of example, but not limited to, the use of offensive language, spreading malicious comments or insults, mainly due to discrimination based on age, gender, marital status, appearance, pregnancy, motherhood, any disability, religious beliefs, the use of threats or insults in public or in private, the belittling or ridiculing of a person or their abilities, the monitoring and persecution of a person, the exercise of unjustified and persistent criticism, the use of offensive expressions or insinuations or obscene, sexual, racist comments or jokes, rude gestures, any kind of unwanted physical contact, online or physical bullying, offensive emails, letters or phone calls, exclusion from company meetings and collective decisions, outbursts of anger against a person, questions about a person's race, ethnicity or geographical origin, sexual gestures or insinuations or persistent propositions or threats to meet, offers of benefits in exchange for accepting propositions of this nature or retaliation for rejecting such propositions, behaviour that may harm or endanger the safety of others, lead to aggressive action or destroy property belonging to the Company.

Furthermore, behaviour may constitute a form of violence or harassment even if the perpetrator did not intend to cause offence or even if it occurs outside the "defined workplace". Behaviour may constitute a form of violence or harassment even if it takes place between colleagues who are in positions of equal seniority. Silence does not in any way constitute acceptance of violent or harassing behaviour. The consumption of alcoholic

beverages or pharmaceutical substances does not constitute a reason that can justify any form of violent or harassing behaviour.

5. This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the implementing regulations and applies to the persons referred to in paragraph 1 of Article 3 of Law 4808/2021.

2. Definitions

1. "Violence and harassment" means forms of behaviour, acts, practices or threats thereof, which aim at, lead to or may lead to physical, psychological, sexual or economic harm, whether occurring in a single instance or repeatedly.

2. "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, degrading or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment on grounds of sex or other grounds of discrimination.

3. "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 (A' 107) and paragraph 2 of Article 2 of Law 4443/2016 (A' 232). These forms of behaviour also 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. "Domestic violence" means all acts of physical, sexual, psychological, economic or verbal violence that take place within the family, regardless of biological or legal ties between former or current spouses or partners and regardless of whether the perpetrator shares or has shared the same residence with the victim in the past. Acts of domestic violence, including physical violence and harassment, stalking and surveillance, can also be committed in the workplace by people in the same working environment, as well as during teleworking.

3. Scope

Forms of violent and harassing behaviour may take place:

- In the workplace, including all Company facilities, public and private spaces, spaces where the employee performs work, receives remuneration, takes breaks (especially for rest or meals), personal hygiene and care areas, changing rooms or accommodation, areas related to company meetings, conferences and work-related events.
- travel to and from work, other travel, trips, training, as well as work-related events and social activities.
- work-related communications, including those carried out in person, but also via information and communication technologies, online or by telephone (e.g. emails, Teams or Zoom meetings, social media).

This policy applies to the Company's management, members and executives, as well as to all employees, regardless of their contractual status.

4. Assessment of the risks of violence and harassment at work

The company, in accordance with the legal framework for the prevention and combating of violence and harassment at work, complies with and implements this Policy. The Company considers it its duty to assess the risks of violence and harassment at work. The Company regularly assesses the risks of violence and harassment at work and takes all necessary measures to minimise this risk.

5. Risk assessment methodology

The Company **works** with all its departments, the Safety Technician and the competent Occupational Physician **to identify potential risk factors** depending on the nature and subject of the work, psychosocial risks, including risks associated with violence and harassment at work , as well as situations that lead to discrimination against employees, in order **to assess existing working conditions** to adjust them in such a way as **to reduce the likelihood of an incident of violence or harassment and any form of discrimination** and to ensure a working environment in which the relationships between employees, partners and members of the

company's management are characterised by **mutual respect, honesty, understanding and trust**.

In particular, the Company **regularly assesses** these **risks** using a specific methodology.

6. Measures for the prevention, control and mitigation of risks

1. The Company strives to foster good relations among its employees and encourages the maintenance of a working environment where respect for human dignity, cooperation and mutual assistance are core values. It seeks open communication with the employer and immediate superiors and colleagues. All executives (Directors, Deputy Directors, Senior Managers, Managers, Deputy Supervisors) are required to monitor their departments for any incidents of violence and harassment, while remaining vigilant and maintaining good communication with their subordinates. The Company ensures that working conditions are suitable and friendly for all employees, always in compliance with the relevant legal provisions.

2. The Company also takes appropriate ongoing compliance measures and administrative practices to prevent, control, limit and address these risks, as well as to monitor such incidents or forms of behaviour, including but not limited to:

- Encouraging the maintenance of a working environment where respect for human dignity, cooperation and mutual assistance are core values.

- Open communication with the employer, immediate superiors and colleagues.

- Process for handling reports/complaints/grievances.

- Ensuring that employees have the necessary training/information to perform their duties, especially in jobs that are more prone to incidents of violence and harassment.

- Actions to raise employee awareness of healthy behaviour patterns (e.g. avoiding addictions), as well as issues concerning vulnerable groups of employees.

- Guidance and support for victims of violence and harassment or victims of domestic violence to help them reintegrate into the workplace.

- Training employees in procedures for managing incidents of violence.

-Regular assessment of the effectiveness of the preventive and response measures implemented and review/update of the risk assessment and measures.

Furthermore, as part of staff awareness-raising, the company may, among other things:

-Hold seminars with mental health specialists or counselling service providers, representatives of voluntary organisations, etc.

-Encourage the participation of employees and management in training programmes and educational seminars on the recognition and management of risks of violence and harassment at work.

3. In addition, all necessary measures are taken to inform and raise awareness among staff, using appropriate means (printed and electronic material, etc.) to combat violence and harassment, ensuring that everyone is aware of the Company's policy on incidents of violence and harassment and knows where to turn in the event of violence or harassment. The Company informs employees and the Company of their specific rights and obligations, to the extent and degree of their own responsibility, in the event of such incidents occurring or being reported or complained about, as well as of the relevant procedure. In order to prevent the above risks, the Company takes measures to inform and raise awareness among its staff, as follows:

- Training and provision of appropriate information to employees (recognition of problematic situations, de-escalation of tensions, complaint management, procedures for dealing with emergencies or incidents of violence).
- Ensuring that employees, customers, partners and visitors to the Company are aware of the above agreed response methods by posting a relevant document in the reception area and/or other areas of the Company.
- Paying special attention to employee groups that are more vulnerable in these matters (young employees, older employees, trainees, temporary employees, immigrants).
- Provide appropriate training, especially to managers and those who exercise a supervisory role in the company.

7. Information on the rights and obligations of those affected by incidents of violence and harassment.

1. Employees, executives and associates of the Company may contact the following bodies in order to obtain more specific information on the rights and obligations of employees and employers, as well as individuals who exercise managerial authority or represent the employer, to the extent and degree of their own responsibility, in the event of the occurrence, reporting or complaint of such incidents.

a) Rights: A person affected by an incident of violence and harassment in the context of their employment relationship has the right to:

i. judicial protection,

ii. appeal, file a complaint and request the Labour Inspectorate to conduct a labour dispute investigation, within the scope of its legal powers

iii. report to the Ombudsman, within the scope of its legal powers, and v. file a complaint within the Company. In any case, when a report/complaint of such behaviour arises within the Company, the affected person retains all rights to appeal to the competent Authorities.

b) Contact details: i. REGIONAL DIRECTORATE FOR THE INSPECTION OF LABOUR RELATIONS - EAST ATTICA - LABOUR RELATIONS COORDINATION DEPARTMENT OF VIOTIA, 17 Epameinondas Street, Thebes, 32200, VIOTIA, TEL. 2262027815

LABOUR RELATIONS INSPECTION DEPARTMENT OF EVIA EL. VENIZELOU & VELISSARIOU 2, CHALKIDA, 22810 82485

LABOUR RELATIONS INSPECTION DEPARTMENT OF KARDITSA V. TZELLA 48 & TALIADOUROU, KARDITSA, 24410 22638

ii. SEPE (complaints hotline: 1555)

III. <https://www.synigoros.gr/?i=submission-system.el.home>

iv. Immediate psychological support and counselling service for women victims of gender-based violence (SOS line: 15900).

c) The Company also applies Articles 12-15 of Law 4808/2021 as well as a specific procedure for handling internal complaints/reports.

8. Submission of a report/complaint – Appointment of a "liaison officer"

1. Any employee, executive or member of the Company's Management, and in general any person covered by this Policy who has been subjected to any form of violence, harassment or discriminatory treatment, or who has witnessed any similar incident in the workplace, as defined above, should not only not hesitate, but must report/complain with complete confidence and without fear of reprisals.in the workplace, as defined above, should not only not hesitate, but must report/complain, with complete confidence and without fear of reprisals, any incident of this nature.
2. The Company appoints as the contact person ("liaison") the current Human Resources Manager, who in this case is Mr. His role is to provide guidance and inform employees on the prevention and handling of violence and harassment at work.

His/her role is informative and consists of guiding and informing employees, regardless of whether they are approached in connection with an incident or complaint of violence and harassment or not.

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

Employees and all persons covered by this Policy may contact him/her

- either in person by visiting his/her office.
- either by telephone on: 2221170253
- or by sending an e-mail to the following address: hr@evoiki-zimi.gr

9. Internal Complaints Management Policy

In addition to appointing a contact person to receive each request, the Company implements a procedure for investigating and examining complaints of violence and harassment in a

manner that ensures the protection of the victim and respect for human dignity. In particular, it has appointed a committee to further investigate any report/complaint. The members of the Committee are: 1. Nikos Konstantakis, 2. Despoina Konstantinidou, 3. Dimitris Flokos.

The members of the committee undertake to investigate and handle any complaint immediately, to investigate and examine the allegations impartially and with respect for human dignity, and to take immediate measures to protect the person concerned.

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.

The Company has established appropriate mechanisms to conduct a fair, timely, thorough and objective investigation. In addition, all necessary measures have been taken to ensure the cooperation of all parties involved, whether employees or third parties. The Company treats all reports of discrimination, violence and harassment with absolute confidentiality and discretion. Persons who have submitted reports will be informed of the receipt of the report and, at regular intervals, of the progress of the investigation of their report.

In order to maintain workplace safety and the integrity of investigations, the Company may, among other things, relocate employees or modify their working hours pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be permitted.

If an incident of violence, harassment or discrimination is indeed substantiated, the Company shall take all necessary, appropriate and proportionate - as appropriate - measures and decide on the type and severity of penalties to be imposed on the accused person in order to prevent and deter the recurrence of similar incidents or behaviour.

These penalties and measures may include, for example:

- A compliance recommendation
- Change of job position, working hours, place and manner of work
- Termination of the employment or cooperation contract with the Company, subject to the prohibition of abuse of rights under Article 281 of the Civil Code
- Disciplinary sanctions in accordance with the Labour Regulations (imposition of a reprimand, fine, compulsory leave)
- Legal action, as the offender may also be liable under criminal or civil law in accordance with the legislation in force.

If the complaint is proven to be unfounded and manifestly malicious, it will be dismissed as inadmissible and further investigated in terms of motives and those involved in order to restore dignity, order and a safe working environment by any legal means and with the possible imposition of compliance measures to prevent recurrence.

Retaliation against the affected person is prohibited, in particular the termination or termination in any way of the legal relationship on which the employment is based, as well as any other unfavourable treatment of a person, if it constitutes vindictive behaviour or a countermeasure to an incident of violence and harassment. On the contrary, the Company protects the dignity of the affected person in every possible way and takes all appropriate measures to deal with such incidents discreetly and prevent their recurrence. In the event that an employee or third party connected in any way with the Company suffers retaliatory behaviour as a result of filing a complaint or assisting in the investigation of incidents of violence, harassment or discrimination, they must follow the above procedure to report the retaliation incident.

10.

Finally, the Company takes measures to protect employment and support employees who are victims of domestic violence, as far as possible, by any appropriate means or reasonable accommodation. Specifically, the Company: a) guides and supports victims of domestic violence in order to reintegrate them into the workplace, b) considers granting special leave or making flexible work arrangements at the request of an employee who is a victim of domestic violence, in order to support them in keeping their job and smoothly reintegrating after such incidents, c) encourages the employee victim to visit the occupational physician. Employees must immediately report any such behaviour or incidents to the person responsible for health and safety issues.

11. Policy Officers

All employees must comply with this policy. The policy applies both in the workplace and in areas related to corporate meetings, conferences and work-related events, whether in person, online or by telephone. The Company ensures an accessible, safe and friendly working

environment where relationships between employees, partners, management and members of the company are characterised by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.

12. Specific issues

1. All questions related to the implementation or interpretation of this policy should be submitted to the Company's Human Resources Manager, who is designated as the person responsible (Reference Person) for informing and advising staff, as well as for issues relating to the prevention and handling of violence and harassment in the workplace.
2. The Company undertakes not to take any reprisals against any employee who reports in good faith information relating to incidents of violence and harassment at work or participates in any relevant investigation or proceedings within the Company or before the Competent Authorities. However, measures may be imposed against employees who deliberately provide false information to the Company. The Company also undertakes to prevent any action that could potentially lead to further victimisation of the affected person.
3. The Company also takes all necessary measures to protect the personal data of victims and complainants, as well as to keep confidential the information submitted during the investigation and examination of complaints, and will disclose it only if and to the extent necessary.
4. Retaliation against the affected person is prohibited, in particular the termination or termination in any way of the legal relationship on which the employment is based, or any other unfavourable treatment of a person, if it constitutes vindictive behaviour or retaliation for an incident of violence or harassment. On the contrary, the Company protects the dignity of the affected person in every possible way and takes all appropriate measures to deal with such incidents discreetly and prevent their recurrence. In the event that an employee or third party connected in any way with the Company suffers retaliatory behaviour as a result of filing a complaint or assisting in the investigation of incidents of violence, harassment or discrimination, they must follow the above procedure to report the retaliation incident.
5. The Company, the "liaison" and any other person responsible for receiving and handling such complaints at company level **shall cooperate, upon request - with any competent public, administrative or judicial authority** which, either on its own initiative or following a request from an affected person within the scope of its competence, requests the provision of data or

information, and undertake to provide assistance and access to the data. To this end, any data collected, in any form, shall be kept in a relevant file in accordance with the provisions of Law 4624/2019 on the "Personal Data Protection Authority, measures implementing Regulation 2016/679 EU of the European Parliament and of the Council of^{f27}April 2016 on the protection of natural persons with regard to the processing of personal data'.

13.Company – Annex

The public limited company under the name "EVOIKI ZYMI ANONYMOUS INDUSTRIAL AND COMMERCIAL COMPANY" and with the distinctive title "EVOIKI ZYMI", GEMI number: 046142022000, Tax Identification Number: 094339738 of the Tax Office of Chalkida and registered office in Kastella, Evia, 14 KM E.O. Chalkida – Aidipsos, Postal Code 344 00.