



**Policy against discrimination,
violence and harassment
at work**

November 2022 (V1)

Policy against discrimination, violence and harassment at work

in accordance with the provisions of Law 4808/2021, as in force

Attica Group, in compliance with the provisions of Law 4808/2021, as in force, is drawing up this policy on combating discrimination and all types of violence and harassment of employees of all kinds in all companies of the ATTICA GROUP S.A., hereinafter jointly referred to as the Group companies.

The purpose of this policy is a) to promote equal opportunities for employees and combat all forms of discrimination, b) to maintain and consolidate a work environment that respects, promotes and safeguards human dignity and has zero tolerance for any kind of violence or harassment at work, expressly including gender-based violence and harassment and sexual harassment.

Attica Group recognizes that violence and harassment at work – on a case-by-case basis – constitute a violation or abuse of human rights, pose a threat to equal opportunities, are unacceptable and incompatible with decent work, and have a negative impact on work organisation and workplace relations, employee motivation and productivity.

Moreover, it recognises the importance of cultivating a workplace mindset based on mutual respect and human dignity in order to prevent incidents of violence and harassment.

This includes any incident of any kind of violence or harassment that occurs in the workplace, during work-related communications, including those that take place via information and communication technologies, as well as outside the workplace, to the extent that they are related to it (e.g. during commuting, during training seminars, professional and social events of the Group companies, etc.), provided that it comes from a person who is affiliated with the Group companies in any way or is employed at them (through third-party service providers, as interns, trainees, volunteers, etc.) or in general a person affiliated with the Group companies in accordance with the provisions of Article 3(1) of Law 4808/2021.

Recognising the right of all employees to a world of work free from all forms of violence and harassment, the Group companies declare that they in no way permit or tolerate such forms of behaviour or practices and take appropriate measures to avoid, prevent, control, restrict, monitor and address them.

Any person falling within Article 3(1) of Law 4808/2021 who is affected by an incident of violence or harassment against them, even if the relationship in which the behaviour was alleged to have occurred has ended, has the right not only to judicial protection, but also to appeal to the Labour Inspectorate and the Ombudsman, and to lodge a complaint within the Group companies.

For the purposes of this document, the following definitions are laid down, as stated to in Article 4 of Law 4808/2021, as in force:

“Violence and harassment” means any form of conduct, act, practice or threat that is aimed at, results in or is likely to result in physical, psychological, sexual or financial harm, whether occurring singly or repeatedly.

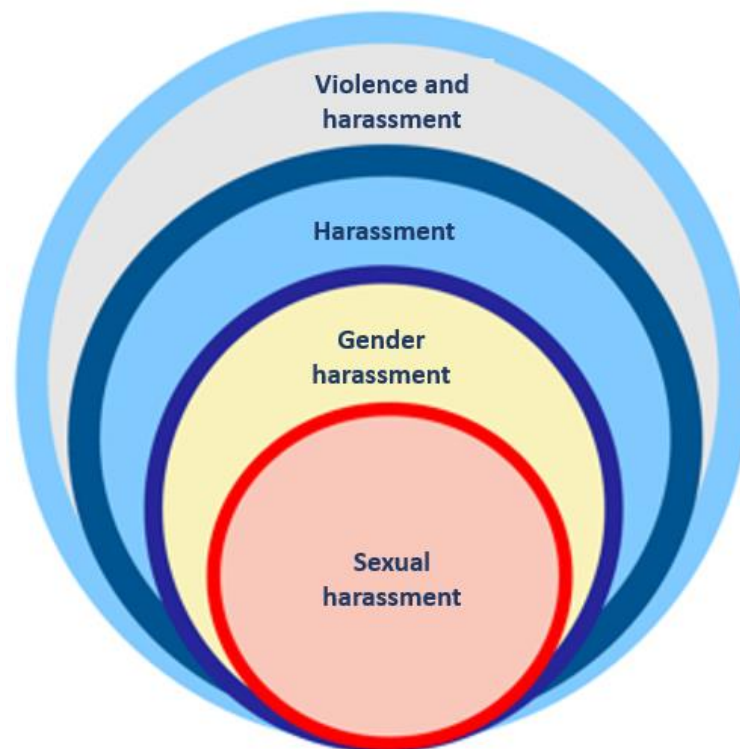
“Harassment” means any form of conduct the purpose or effect of which is to violate the dignity of the person and to create an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether it is a form of discrimination and includes harassment based on gender or on other grounds of discrimination.

“Gender harassment” means conduct related to the gender of a person, the purpose or effect of which is to violate the dignity of that person and to create an intimidating, hostile, degrading, humiliating or offensive environment, as defined in Article 2 of Law 3896/2010 (A 107) and Article 2(2) of Law 4443/2016 (A 232). It also includes forms of conduct causally linked to the person’s sexual orientation, expression or gender identity or characteristics.

“Sexual harassment” means forms of unwanted verbal, psychological or physical conduct of a sexual nature, resulting in an affront to a person’s personality, especially with the creation of a concomitant intimidating, hostile, degrading, humiliating or offensive environment.

Diagram illustrating the relationship between the terms:

“Violence and Harassment”, “Harassment”, “Gender Harassment”, “Sexual Harassment”



To combat discrimination, violence and harassment at work, the Group companies have taken the actions set out in detail in the following chapters hereof, as follows:

- a) assessment of the risks of violence and harassment at work;
- b) implementation of measures to prevent, control, contain and respond to these risks, as well as to monitor such incidents or forms of behaviour;
- c) informing and raising the awareness of personnel;
- d) Provision of information to employees about the rights and obligations of Group companies, employees and persons exercising management prerogatives or representing the employer, to the extent and degree of their own responsibility, in the event of the occurrence or reporting of such incidents, as well as about the relevant procedure;
- e) designation of a reference person (“liaison”) responsible for guiding and informing employees on the prevention and handling of violence and harassment at work;
- f) taking, on a case-by-case basis, appropriate measures or making reasonable adjustments in order to protect employment as much as possible and to support employees who are victims of domestic violence.

CHAPTER A

Risk assessment – Prevention and information measures Employee and Company Rights and Obligations

A1. Assessing the risks of violence and harassment at work

The Group companies identify the “risks”, namely the factors that can be grounds for discrimination, contributing to incidents of violence and harassment (gender, age, colour, religious or other beliefs or other characteristics) and focus on the groups of persons that are most exposed to them. They then carry out risk assessment, using digital tools for business risk assessment, such as the On-line Interactive Risk Assessment platform used by the Group companies, or any other suitable tool. At the same time, the Group companies take appropriate measures to avoid incidents of harassment.

Indicatively, measures of a technical nature are taken in workspaces (e.g. adequate lighting where required or anything else). Moreover, measures are taken which are deemed appropriate and concern the break or dining area, regulation of employee shifts – especially during night work, business travel, social events of the Group companies, etc.

Examples of harassment

- Comments about someone’s appearance or character that are embarrassing or awkward.
- Insults or circulation of offensive or obscene material.
- Innuendo, mockery, obscene or sexual/racist jokes or comments against homosexuals.
- Use of offensive language when describing someone with a disability or mocking someone with a disability.
- Unwanted attention such as watching, stalking and unwanted verbal or physical attention.
- Unwanted sexual gestures, persistent “proposals” for dates, or threats.
- Sending of unsolicited messages with sexually bold content via SMS, e-mail, social media, fax or letter, or making threatening phone calls.
- Arbitrary, abusive and persistent questions about someone's age, marital status, personal life, sexual interests or orientation, as well as similar questions about someone's race or nationality, including their cultural identity and religion.
- Insinuation that the acceptance of sexual proposals by the employee may further their career, or that refusal to enter into a sexual relationship may adversely affect them.
- Unwanted sexually suggestive looks, rude gestures, touches, or any kind of unwanted physical contact.
- Spreading of malicious comments or insulting someone (mainly due to discrimination against them based on age, race, sex change, type of marriage, cohabitation agreements, pregnancy and maternity, gender, any disability, sexual orientation, religion or beliefs).

A2. Measures for preventing, controlling, limiting and responding to these risks, as well as for monitoring such incidents or forms of conduct

The Group companies take care of implementing actions aimed at informing and raising awareness among employees regarding the prevention of and response to violence and harassment in the workplace. To this end, they make accessible information on the procedures in place at company level for reporting and responding to such forms of conduct. Furthermore, in the context of informing their personnel, the Group companies may organize, on their own initiative, training for their employees for the purpose of preventing, controlling and limiting harassment, discrimination at work, and retaliation.

In this case, the employees invited to receive training are obligated to participate in the relevant training days/seminars that are held either by the Group companies or by an organisation associated with them (consultancy firm, training centre, etc.).

Furthermore, if employees express an interest in or the intention to attend training seminars offered by organisations competent to do so regarding harassment at work or domestic violence, the Group companies encourage and facilitate said attendance, granting the relevant leave to persons who apply for it.

Training objectives:

- a) contribute to the establishment of standards of conduct that promote equality and a change in culture, insofar as the culture in question creates or contributes to phenomena of sexual or any other form of violence and/or harassment;
- b) provide information to participating persons about the negative effects of bullying at work;
- c) cultivate and create values among employees in positions of responsibility that will help them to respond effectively to such incidents and to implement the procedures aimed at responding to them;
- d) facilitate the communication of managers and employees with the companies that employ them;

In any case, the Group companies assess the effectiveness of the measures on a regular basis and, if deemed necessary, re-evaluate the risks and formulate the measures accordingly.

The heads of all directorates, sections and departments of the Group Companies have the specific responsibility to ensure that their subordinates observe and implement this policy, along with the measures that have been taken by each Group Company, as employers, with regard to preventing and limiting the occurrence of violence and harassment.

Furthermore, said persons are required to be available to enable their subordinates to approach them and to express to them any concerns, complaints and protests regarding the subject of this policy.

A3. Employee information and awareness actions

The Group Companies provide their personnel with information on the risks of violence and harassment, on the prevention and protection measures taken, and on the procedure followed for responding to reports of such incidents.

In the context of informing and raising the awareness of employees, the Group companies endeavour to organise targeted meetings with personnel to prevent the risks of violence and harassment at work and address them in a timely manner. They may also organise relevant seminars in cooperation with consultancy service providers or mental health specialists.

A4. Provision of information about the rights and obligations of Group companies, employees and persons exercising management prerogatives or representing a given company/employer, to the extent and degree of their own responsibility, in the event of the occurrence or reporting of such incidents, as well as about the relevant procedure for responding to such incidents.

The Group companies declare zero tolerance for incidents of violence and harassment and inform their staff about the rights and obligations of employees should such incidents occur or be reported, and about the procedure for dealing with them.

Moreover, it is incumbent on the employees of the Group Companies to understand the content of this policy, be aware of their rights and obligations in the event of an incident or conduct falling within the scope hereof, and follow the instructions and guidelines of the company/employer regarding the relevant matter.

Specifically:

1. Each employee or person generally falling under Article 3(1) of Law 4808/2021 who is affected by an incident of violence and harassment at work, during the labour relationship or even if the contract or labour relationship under which the incident or behaviour is alleged to have occurred has expired, has a right to:

- a) **judicial protection**;
- b) appeal, submit a complaint and apply for a labour dispute to be brought before the **Labour Inspectorate**, in accordance with the applicable laws;
- c) recourse to **the Ombudsman**, in the context of its legal competences; and
- d) submit a **complaint within the Group companies**, in accordance with the complaints management policy set out below in Chapter B.

2. Any person who is the object of violence or harassment at work is entitled to leave the workplace for a reasonable period of time, without loss of salary or other adverse consequence, provided that in their reasonable belief there is an imminent serious risk to their life, health or safety, especially when the employer is the perpetrator of such behaviour or when the employer does not take the necessary appropriate measures in order to restore labour peace, or when such measures are not capable of stopping the violence and harassment.

3. In this case, the person leaving the workplace is obligated to give prior written notice to Attica Group's Human Resources and Culture Management Director, reporting the incident of violence and harassment and the incidents that justify their belief that there is a serious imminent risk to their life, health or safety. If the risk does not exist or has ceased to exist and the person who has left refuses to return to the workplace, the Group company employing the person in question may refer the matter to the Labour Inspectorate, requesting that the dispute be resolved.

4. On a case-by-case basis, the Group companies are required to take the necessary appropriate and proportionate measures against the reported person in order to prevent any recurrence of such an incident or conduct. These measures may include recommending compliance, change of job, hours, place or manner of providing work, or terminating the employment relationship or partnership, without prejudice to the prohibition of abusing the right of Article 281 of the Hellenic Civil Code.

5. Persons holding positions of responsibility and persons generally representing the Group companies are obliged to set a good example through their conduct, to intervene by preventing harassment and psychological bullying, to immediately report any complaint about violence and harassment to Attica Group's Human Resources and Culture Management Director, to communicate to their subordinates good standards of conduct, and to ensure that there is a supportive environment for their associates/subordinates.

Provide the contact information of public bodies:

- For the Labour Inspectorate, report line 1555.
- The 15900 SOS line provides direct psychological support and counselling to women who are victims of gender-based violence.
- The Ombudsman website: www.synigoros.gr.

A5. Appointment of reference person-“Liaison” for guiding and informing employees with regard to preventing and responding to violence and harassment at work.

The person responsible for guiding and informing employees with regard to preventing and responding to violence and harassment at work – hereinafter, “Liaison” – is the **Human Resources and Culture Management Director** of Attica Group.

The “Liaison” informs and guides personnel with regard to preventing and responding to violence and harassment, in the event of an incident or the submission of a complaint.

Persons falling within the scope hereof may contact the designated reference person/Liaison via email. Regarding any information that becomes known to them, the aforementioned reference person is bound by the legislation in effect on confidentiality and protection of natural persons from processing of their personal data.

A6. Employment protection and support of employees who are victims of domestic violence

The Group Companies actively support victims of domestic violence, taking into account their family and financial situation (children who are minors, children with disabilities, etc.) and exercise all necessary care to preserve their jobs and help them reintegrate smoothly. To carry through on this commitment, the Group companies may take the following actions, among others:

- Provide access to flexible forms of employment.
- Provide assistance to facilitate access to support structures.
- Grant special leave, at the request of an employee who has been the victim of domestic violence.

CHAPTER B

Procedure for receiving and investigating complaints

B1. Communication channels – Competent persons

Group companies encourage submission of complaints about all incidents that may constitute violence or harassment or retaliation for any such incidents, regardless of whom they are directed against and regardless of who the perpetrator is and what position they hold.

Recipients of such conduct should address themselves and express their concerns to the **Group's** specially appointed **Transparency Committee**, in accordance with the provisions of the Group's current Whistleblowing Procedure.

The Transparency Committee is made up of the following persons:

- the Chairperson of the Attica Group Audit Committee;
- the Legal, Insurance & Corporate Affairs Director
- the Internal Audit Director.

A complaint related to an incident of violence or harassment at work may be submitted using any of the following communication channels:

1. Special email address: conductline@attica-group.com
2. Special postal address:
Attica Group SA
Transparency Committee
PO Box 76090
3. Electronic Contact Form available on the Company's website <https://www.attica-group.com/el/εταιρική-υπευθυνότητα/καταγγελίες-για-παραβατικές-συμπεριφορές.html>
4. Personal contact with one of the members of the Transparency Committee.

B2. Investigation and consideration of complaints - Impartiality and protection of confidentiality and personal data

After the submission of a complaint, the procedure set out in the Group's Whistleblowing Procedure is followed, and the **Transparency Committee** is informed.

Witnesses to incidents must be disclosed to the aforementioned members of the Transparency Committee. Disclosure shall be made in any appropriate manner and must refer to specific incidents.

All reports or complaints regarding violence, harassment and/or discrimination at work will be thoroughly investigated by the Group companies. There is no deadline for submitting the complaint. The aforementioned persons authorised to investigate the complaint have free access to the files of the Group companies and to any audiovisual material collected by them for the security of their facilities.

The investigation of the complaint is initially completed by the Transparency Committee's preparation of a report on the complaint, which includes findings, suggestions and conclusions of the investigation. The report, with the evidence in the file, is submitted to the Management of the given Group company.

If the complaint proves to be well-founded, appropriate measures are taken in response. Furthermore, a new risk assessment is carried out to prevent recurrence of a similar incident or conduct.

The Group Companies and the natural persons so mandated for this purpose are legally bound to carry out an impartial examination of reported persons and to maintain the confidentiality of the information that comes to their knowledge throughout and after the end of the examination of the complaint/report, to the extent that this does not impede the progress of the investigation and the taking of compliance measures and responding to the incident, and faithfully complying in each case with the provisions of the General Data Protection Regulation, as in force, for the persons involved. Reports or complaints that

come to the Group companies, any documents that come into their possession during the investigation, as well as the findings of the investigation, shall be kept in the personal file of the reporting person and the reported person, in compliance with the rules on personal data protection as set out in the General Data Protection Regulation, as in force.

B3. Prohibition of retaliation

Termination or dissolution in any manner of the legal relationship on which the employment is based, as well as any other adverse treatment of a person falling under Article 3 of Law 4808/2021, insofar as it constitutes vindictive behaviour or retaliation, within the meaning of Article 14 of Law 3896/2010 (A 207), against a case of violence and harassment under Article 4 of Law 4808/2021. Furthermore, any act of retaliation against the person who filed a complaint or a report about violence or harassment at work or who participates in the investigation of a complaint contravenes this policy and may even establish grounds for termination of the employment/partnership relationship with the person responsible, depending on the extent to which this is deemed appropriate in each case. Every act of retaliation must be reported immediately to the aforementioned persons mandated to receive complaints and shall also be the subject of a thorough investigation by the Group companies and their competent bodies.

B4. Consequences of violation of the prohibition of violence and harassment at work

1. When an employee or person with another employment relationship or in general a person falling under Article 3(1) Law 4808/2021 violates the prohibition of violence and harassment, the Group companies are bound to take the necessary appropriate and proportionate measures, on a case-by-case basis, against the reported person, in order to prevent any recurrence of such an incident or conduct and to protect the affected person.
2. Measures against the reported person may include recommendation for compliance, change of job, hours, place or manner of providing work, or the termination of the employment relationship or partnership, without prejudice to the prohibition of abuse of the right set forth in Article 281 of the Hellenic Civil Code.
3. In addition, for the Group Companies that have a **Labour Regulation** in accordance with the applicable legislation, the procedure provided for in each Regulation shall be followed, with regard to disciplinary offences, disciplinary proceedings and disciplinary penalties, in the context of or following complaints about incidents of violence and harassment at work.

B5. Cooperation with Authorities

The Group companies undertake the obligation to cooperate and provide all relevant information and assistance, if requested, to the competent authorities. The persons authorised to receive and investigate complaints submitted to the Group companies about violence and harassment at work are also subject the same obligation. For this reason, all the data collected in any format are kept in a relevant file, to which access is granted, upon request, to the competent authorities, in compliance with the provisions on the protection of natural persons with regard to the processing of personal data.