



# POLICY ON COMBATING DISCRIMINATION, VIOLENCE AND HARASSMENT AT WORK AND PROCEDURE FOR SUBMITTING AND EXAMINING COMPLAINTS

Written by: Human Resources Department	Version: 1
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## 1. PURPOSE

"**EPSILON NET**" (hereinafter the "Company") complies with all measures and obligations relating to the application of the provisions of Part II of Law 4808/2021 on preventing and combating all forms of violence and harassment, including gender-based violence and harassment, as well as sexual harassment.

The Company is committed to maintaining a working environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a working atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including violence and harassment. Therefore, the Company expects that all relationships between individuals on its premises will be professional and free from discrimination, prejudice, violence and harassment.

The Company has developed this Policy to ensure that all of its employees can work in an environment free from violence, unlawful harassment, discrimination and retaliation and will make every reasonable effort to ensure that all individuals bound by the Policy are familiar with it and are aware that any complaint in relation to a breach of the Policy will be investigated and resolved appropriately. It is expressly and unequivocally stated that all forms of discrimination, violence and harassment that occur in the course of work, whether related to or arising from work, are strictly prohibited.

This Policy should not and cannot be used as a basis for excluding or segregating persons of a particular gender or any other protected characteristic from participation in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid harassment complaints. The law and the Company's policies prohibit discrimination on the basis of gender or any other protected characteristic in terms, conditions, privileges and rights of employment.

The prohibitions against violence, discrimination, harassment and retaliation are intended to

complement and promote these policies, not to be the basis for an exception to them.

## **2. SCOPE OF APPLICATION**

All employees and those associated in any way with the Company must comply with this Policy.

This Policy applies to the Company's management and members, all prospective employees, employees with a dependent employment contract, persons providing services under contract, project, independent services and temporary employment contracts, employees whose employment with the Company has ended, employees employed through third party service providers, trainees and apprentices, and applies to conduct that comes either from colleagues or from third parties not directly connected to the Company (e.g., external salespersons, advisors or customers).

Conduct prohibited by these Policies is unacceptable in the workplace, whether physically present, online or by telephone, and in any work environment outside the workplace, such as during business trips, business meetings and social events conducted in the context of work.

## **3. DEFINITIONS**

### **Distinctions**

Discrimination is defined as discrimination based on gender, race, color, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health status, age or sexual orientation. Harassment on the basis of any other protected characteristic is also strictly prohibited.

### **Violence and Harassment**

Violence and Harassment are those forms of behavior, acts, practices or threats of such, which are intended to cause, lead to or are likely to lead to physical, psychological, sexual or economic harm, whether occurring individually or repeatedly.

Harassment means any form of conduct that has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, degrading or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment on the grounds of gender or other grounds of discrimination.

Under this Policy, harassment is verbal, written or physical conduct that disparages or shows hostility or aversion toward an individual because of his/her race, color, religion, gender, sexual orientation, gender identity or expression, national origin, age, disability, family status, citizenship, genetic information or any other characteristic protected by law or his/her relatives, friends or associates and that: (a) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (b) has the purpose or effect of unreasonably interfering with an individual's work performance; or (c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct is illustrative and not limiting to:

- Name-calling, insults or negative stereotyping, threatening, intimidating or hostile acts, derogatory jokes and written or graphic material that disparages or shows hostility or aversion towards an

individual or group that is posted on walls or elsewhere on the employer's premises or circulated in the workplace during the course of work or using Company equipment via e-mail, telephone (including voice mail), text messages, social networking sites or other means.

- Physical harassment, including, for example, physical interference with normal work or movement, or moral harassment ("mobbing"), i.e. the systematic, methodical and continuous use of psychological violence, moral violence, which may take the form of humiliating behavior, unequal treatment, insults, isolation, pushing people to make mistakes, threats, psychological violence, assigning excessive workloads combined with malicious comments on allegedly poor performance, placement in an "on hold" position without duties and job description and aimed at creating a hostile, humiliating environment, which offends the personality, dignity or physical-mental integrity of the employee, in order to cause him/her to resign.
- Retaliation or intimidation for reporting or threatening to report any of the above-mentioned forms of harassment or for cooperating in the investigation of a harassment incident.

### **Gender-based harassment & Sexual harassment**

Gender-based harassment is any form of conduct related to a person's gender that has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of behavior include sexual harassment, as well as forms of behavior linked to a person's sexual orientation, expression, identity or gender characteristics.

Specifically, sexual harassment is defined as unwelcome conduct of a sexual nature, including unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when, for example: a) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting that individual; or c) such conduct is intended or results in unjustified intervention to that said person's work performance or to create an intimidating, hostile or offending work environment. Sexual harassment can involve a range of subtle and not-so-subtle behaviors and can involve people of the same or different gender. Depending on the circumstances, these behaviors may include unwanted sexual gestures or requests for sexual favors; sexual jokes and innuendos; verbal abuse of a sexual nature; comments about a person's body, sexual ability or sexual inadequacies; persistent looking, whistling or touching; offensive or obscene comments or gestures; displaying sexually suggestive objects or images.

The above acts are indicative and do not constitute an exclusive list of prohibited acts. The employee or third party who engages in such prohibited conduct shall be and shall bear full responsibility for his/her actions.

### **Retaliation**

The Company encourages the reporting of all perceptible incidents of discrimination, violence or harassment. It is the Company's policy to investigate such complaints in a timely and thorough manner.

The Company prohibits retaliation against any person who complains of discrimination, violence or harassment or participates in the investigation of such complaints, in compliance with the provisions of article 13 of Law 4808/2021 and the labor law.

## **A. PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK**

### **Measures for Risk Prevention, Control and Mitigation - Actions of Awareness & Awareness Raising**

The Company ensures a safe, friendly and accessible working environment, where relationships between individuals are characterized by respect for human dignity, cooperation, trust and mutual assistance.

The Company conducts annual inspections of the facilities to assess and identify any vulnerability to workplace violence or harassment and takes any necessary corrective action to reduce all risks.

The Company, within the framework of its capabilities, takes all appropriate measures for the guidance, support and smooth reintegration of victims of domestic violence, making, as far as possible, all reasonable adjustments to working conditions to protect employment and support employees who have been victims of domestic violence. The Company uses all appropriate measures (e.g. printed and electronic material, participation in training seminars/Mental Health seminars/meetings, etc.) to inform, train and raise awareness among its staff in order to identify and combat incidents of violence and harassment at work and ensure that everyone is aware of these Policies, the procedures applied by the Company and who they can address in case of violence or harassment. The Company also organizes targeted group and one-on-one meetings with the staff to discuss relevant issues and address any risks in a timely manner, and encourages its staff to participate in training programs and seminars aimed at identifying and managing incidents of violence and harassment at work.

The Company encourages its employees and any third party associated in any way with the Company to report incidents of discrimination, violence and harassment in the workplace that they perceive or witness.

The Company periodically evaluates the effectiveness of these Policies and updates or revises them if deemed necessary.

### **Information on the rights and obligations of employees and the Company in case of violence and harassment incidents, and the relevant procedure.**

Any person who believes that he or she is a victim of conduct prohibited by this Policy or has witnessed such conduct, has the right: a) to judicial protection, b) to appeal to the Labor Inspectorate, c) to report to the Consumer Ombudsman and d) to file a complaint within the Company. The exercise of the right of intra-corporate complaint shall not affect the right of the aggrieved party to apply to the competent authority.

Competent administrative authorities for lodging a complaint

#### **Labor Inspectorate**

Citizens' hotline: 1555 Website: [www.sepe.gov.gr](http://www.sepe.gov.gr)

Email: helpdesk@sepenet.gr

### **Consumer Ombudsman**

Address: 144 Alexandras Avenue, 11471, Athens

Telephone numbers: 210 6460862, 210 6460814, 210 6460612, 210 6460734, 210 6460458

Email: grammateia@synigoroskatanaloti.gr

Also, women who are victims of violence and harassment can contact the direct psychological support and counselling service for women who are victims of gender-based violence at **SOS Line 15900**.

In the event of a violation of this Policy, the Company shall take the necessary and appropriate measures, as appropriate, against the complainant, in order to deter and prevent a similar incident or behavior from recurring.

These actions may include (but are not limited to): (a) disciplinary sanctions; (b) change of role, working hours, place or manner of work; (c) termination of an employment or cooperation contract; (d) legal action. Disciplinary sanctions may include, for example, training, referral to sessions, warning, reprimand or any other measure the Company believes is appropriate in the circumstances.

### **Further Information Reference Entities**

Any employee who has questions or concerns regarding these Policies should contact the Human Resources department, which is designated as the entity responsible (Reporting Entity) for informing and advising staff on the prevention and management of violence and harassment in the workplace.

## **B. PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS**

The Company encourages the reporting of all perceived incidents of discrimination, violence, harassment or retaliation, regardless of the identity or position of the perpetrator. Individuals who believe they have been the victim of such conduct should discuss their concerns with their immediate supervisor, the Human Resources Department or the Company's legal counsel, who are responsible for receiving any complaints.

The Company has put in place the appropriate mechanisms to conduct an impartial, fair, timely, thorough and objective investigation, and all necessary measures have been taken to ensure the cooperation of all parties involved, whether employees or third parties. The Company and any person responsible for receiving complaints are committed to receive, investigate and manage any relevant complaint, showing zero tolerance to discrimination, violence and harassment, not to obstruct the receipt of complaints and to take immediate measures to protect the affected persons.

The Company and any person responsible for receiving and managing complaints at the company level undertake to cooperate with any competent public, administrative or judicial authority which, either on its own initiative or following a request by an affected person, within the scope of its competence, requests the provision of data or information, and undertake to provide assistance and access to any data requested. To this end, any data collected, in any form, are kept in a relevant file in accordance with the provisions of Law 4624/2019 and the Company's Personal Data Protection Policy.

In addition, the Company encourages individuals who believe they are being subjected to such conduct to immediately inform the perpetrator that his or her conduct is unwelcome and request that it be stopped. Often this action alone will solve the problem. The Company recognizes in any case, however, that an individual may prefer to follow the complaint procedure either internally or before the competent administrative or judicial authorities.

The Company encourages the immediate reporting of complaints or concerns so that timely and constructive action can be taken before relationships are irreparably damaged. Therefore, although no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or alleged incidents of harassment.

Complaints of conduct in violation of this policy will be accepted in writing, eponymously or anonymously, and will be investigated promptly and thoroughly. The investigation may include individual interviews with the parties involved and, where necessary, with people who may have observed the alleged behavior or may have other relevant information.

To maintain workplace safety and the integrity of the investigations, the Company may, among other things, move 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 allowed. The Company and each person responsible for receiving and managing complaints at the enterprise level undertake to treat with absolute confidentiality and discretion the handling of all complaints throughout the investigative process and take all measures to protect the Personal Data collected during this process, to the extent consistent with adequate investigation and appropriate corrective action.

Persons who have submitted complaints will be informed of the receipt of the complaint and periodically of the progress of the examination of their complaint. Upon completion of the investigation, the Company will communicate the results of the investigation as soon as practicable and appropriate.

Retaliation against an individual for making a complaint of violence, harassment or discrimination or for participating in an investigation regarding an allegation of harassment, violence or discrimination is strictly prohibited and is a serious violation of this policy and, like the incident of violence, harassment or discrimination itself, will be subject to the management measures set out above. If any employee of the Company or a third party who is in any way related to him or her believes that he or she has been subjected to retaliatory behavior as a result of filing a complaint or assisting in the process of investigating incidents of discrimination, violence and/or harassment, he or she must report the incident immediately; such complaints will be promptly and thoroughly investigated and addressed.

Inappropriate behavior that constitutes violence or harassment, discrimination or retaliation will be dealt with appropriately, as set out above.

If a party involved in a complaint does not agree on the resolution method, that party may appeal to the CEO of the Company or to the General Manager. False and malicious allegations of harassment, discrimination or retaliation (as opposed to allegations that, even if false, are made in good faith) may result in appropriate disciplinary action.

**Date of approval:**

Approved by the Board of Directors of EPSILON NET SA at its meeting on 08/02/2022.