

POLICY FOR THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT AT WORK

Introduction

Our company, HiSCS S.M.S.A. complies with all measures and obligations related to the implementation of Part II of Law 4808/2021 for the prevention and management of all forms of violence and harassment, including gender-based violence and sexual harassment.

Purpose of this Policy

The purpose of this policy is to establish and maintain a work environment that respects, promotes, and safeguards human dignity and the right of every individual to a workplace free from violence and harassment. Our company declares that it acknowledges and respects every employee's right to such an environment and does not tolerate any form of violence or harassment that occurs during work, is connected to work, or arises from it, including gender-based and sexual harassment.

Scope

This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the relevant delegated legislation and applies to all employees and workers, regardless of their contractual status.

1. PREVENTION AND MANAGEMENT OF VIOLENCE AND HARASSMENT

- 1.1. The company conducts a risk assessment of violence and harassment in the workplace, taking into account any inherent risks arising from the nature of the activity, the job position, factors such as gender and age or other characteristics that may be grounds for discrimination, as well as risks concerning special groups of employees (e.g., newly hired employees, night shift workers).
- 1.2. The company takes measures to prevent, control, limit, and address these risks, as well as to monitor such incidents or forms of behavior, demonstrating zero tolerance towards violence and harassment, operating with confidentiality and respecting human dignity. For example, the company encourages maintaining a work environment where respect for human dignity, cooperation, and mutual assistance are core values. It undertakes actions to raise employees' awareness of healthy behavior standards and issues concerning vulnerable employee groups. It also takes technical measures to prevent risks, such as adequate lighting of work areas. The company also provides a process for managing reports/complaints and regularly evaluates the effectiveness of its actions.
- 1.3. The company undertakes actions to inform and sensitize personnel about possible risks of violence and harassment in the workplace and the related prevention and protection measures against such incidents. As part of raising staff awareness, targeted meetings are organized to discuss relevant issues and promptly address potential risks. The participation of management executives and employee representatives in training seminars related to the identification and management of workplace violence and harassment risks is also encouraged.
- 1.4. The company provides information on the rights and obligations of employees and the employer, as well as of individuals exercising managerial authority or representing the employer, to the extent and degree of their responsibility, in case such incidents are reported or alleged, as well as about the related complaint reception and examination procedure. Specifically, any person affected by an incident of violence or harassment during access to employment, during the employment relationship, or even after the termination of the contract or employment relationship under which the incident or behavior allegedly occurred, has the following options: 1) resort to judicial protection, 2) file a complaint with the Labor Inspectorate within its legal jurisdiction, 3) submit a report to the Ombudsman within its legal jurisdiction, and 4) file an internal complaint within the company, according to the complaint management policy. Contact details for the authorities are as follows: The Greek Ombudsman: **213 13 06 600** (e-mail: press@sinigoros.gr), Labor Inspectorate Hotline through citizen service line **1555** (e-mail: press@sinigoros.gr).

helpdesk@sepenet.gr), SOS line **15900** for immediate psychological support and counseling for women victims of gender-based violence.

- 1.5. The company ensures, as far as possible, the protection of employment and support for employees who are victims of domestic violence, through all appropriate means or reasonable accommodations, such as flexible working arrangements following a request by an employee who is a victim of domestic violence.

2. COMPLAINT RECEPTION AND EXAMINATION PROCEDURE

- 2.1. The company guarantees safe and easily accessible communication channels for the reception and examination of complaints and for informing complainants, facilitating the relevant procedures. In any case, the affected person will be informed at any stage of the process followed within the company about their right to also file a complaint with the authorities within their jurisdiction (Labor Inspectorate and Ombudsman) as well as with the judicial authorities at their discretion.
- 2.2. The receipt, investigation, and handling of complaints are conducted promptly and impartially, in a manner that respects human dignity and ensures the protection of confidentiality and the personal data of victims and accused people collected during the exercise of the above duties.
- 2.3. The company commits to upholding the prohibition of retaliation obligation, according to Article 13 of Law 4808/2021 and the provisions of labor legislation.
- 2.4. In case of confirmed violation, the company takes the necessary, appropriate, and proportional measures against the accused to prevent and stop the recurrence of similar incidents or behavior. These measures include, but are not limited to, compliance recommendations, change of position, change of working hours, change of workplace or working method, or termination of the employment or cooperation relationship, subject to the prohibition of abuse of rights under Article 281 of the Civil Code.
- 2.5. The company and every person responsible for receiving and managing complaints commit to cooperating and providing assistance and all relevant information to the public, administrative, and judicial authorities upon their request, maintaining a relevant file in compliance with the provisions of Law 4624/2019.

Date: 30.12.2021

HiSCS S.M.S.A.