

## **Policy for the prevention and management of all forms of violence and harassment in the workplace**

### **1. Purpose**

The purpose of this policy is to create and establish a work environment that respects, promotes, and safeguards human dignity and the right of every individual to a work world without violence and harassment. ICAP OUTSOURCING SOLUTIONS S.A. (hereinafter the "Company") declares that it recognizes and respects the right of every employee to a work environment free from violence and harassment and that it does not tolerate any such behaviour, in any form, from any person.

This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the applicable regulatory legislation and applies to the individuals referred to in par. 1 of article 3 of Law 4808/2021.

### **2. Scope of application**

This Policy protects all employees regardless of their contractual status, individuals undergoing training, including interns and apprentices, employees whose employment relationship has ended, prospective employees of the Company.

The Policy applies to violence and harassment that occur during, are related to, or result from work:

- a) in the workplace, including public and private areas and areas where the employee provides work, receives remuneration, takes a break particularly for rest or meals, in personal hygiene and care areas, changing rooms or accommodation provided by the employer
- b) during commutes to and from work, other travel, trips, training, as well as work-related events and social activities, and
- c) during work-related communications, including those conducted through information and communication technologies.

### **3. Policy Framework**

The Company complies with all measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and management of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

The Company does not tolerate any form of violence, harassment, intimidation, psychological abuse in the workplace, aggressive or unjustified behaviour, offensive, annoying and generally unwanted behaviour against any employee on behalf of a supervisor, colleague and/or third parties.

All forms of violence and harassment that occur during employment, whether related to or resulting from it, including gender-based violence and harassment and sexual harassment, are

prohibited.

The Company does not tolerate any form of harassment based on race, colour, religious or other beliefs, gender, age, national or ethnic origin, marital or social status, sexual orientation, gender identity or characteristics, physical or mental disability or chronic illness or medical conditions in general, physical appearance, or any other element protected by law.

#### **4. Definitions and Concepts**

a) "Violence and harassment" refers to the forms of behaviours, actions, practices or threats thereof, which aim, lead or may potentially lead to physical, psychological, sexual or economic harm, whether occurring as isolated incidents or repeatedly;

b) "Harassment" refers to the forms of behaviour intended or resulting in the violation of a person's dignity and the creation of an intimidating, hostile, degrading, humiliating or aggressive environment, regardless of whether these constitute a form of discrimination, and include gender-based harassment or other reasons for discrimination.

c) "Gender-based harassment" refers to forms of behaviour related to the gender of a person, intended or resulting in the violation of this person's dignity and the creation of an intimidating, hostile, degrading, humiliating or aggressive environment according to Article 2 of Law 3896/2010 (A' 107) and par. 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 sexual orientation, expression, identity or characteristics of a person's gender.

d) "Sexual harassment" means forms of verbal, psychological or physical behaviours of a sexual nature, that offend a person's personality, particularly by creating an intimidating, hostile, degrading, humiliating or aggressive environment around them.

#### **Preventing and combating violence and harassment in the workplace**

##### **5. Risk assessment of violence and harassment in the workplace**

In order to prevent and combat violence and harassment in the workplace, the Company conducts assessments of occupational risks, including psychosocial risks. In addition, the Company may conduct anonymous surveys, through questionnaires, regarding the work environment and the identification of violence and harassment risks at work.

##### **6. Measures to prevent, monitor, mitigate and manage violence and harassment risks in the workplace**

This policy is communicated to employees and to all individuals who fall within its scope. All employees are obliged to comply with the policy.

The Company ensures an accessible and safe environment, where open communication is encouraged and relationships between employees are distinguished by mutual respect and cooperation.

Employees are informed and provided with training material concerning violence and harassment in the workplace. The Company also provides employees with information regarding potential risks of violence and harassment and the preventive and protective measures in place, including their obligations and rights in relation to such incidents.

The Company is committed to receiving and investigating every relevant report or complaint,

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demonstrating zero tolerance to violence and harassment, with confidentiality and respect for human dignity. It is, also, committed to not interfere with the receipt, investigation and management of such reports or complaints.

The Company encourages employees and any person relevant to it to report the incidents of discrimination, violence and harassment in the workplace, in which they happen to witness.

The Company updates the risk assessment and regularly evaluates the effectiveness of the preventive and responsive measures addressing violence and harassment in the workplace.

## **7. Employee awareness and sensitization activities**

The Company provides employees with information concerning potential violence and harassment risks in the workplace and the relevant prevention and protection measures, including their obligations and rights in relation to such incidents.

## **8. Information regarding the rights and obligations of employees and the Company**

Every employee, or person employed under any other arrangement, who is affected by an incident of violence and harassment against them, even if the working relationship under which the incident or behaviour allegedly occurred has ended, has the right, beyond judicial protection, to appeal to the Labour Inspectorate and the Ombudsman in accordance with Law 3896/2010 and Law 4443/2016 on equal treatment.

Also, the same affected individual has the right to submit a relevant complaint within the Company (art. 10, Law 4808/2021), in which case the Company is obliged to take the necessary offerings and proportionate measures, on a case-by-case basis, against the accused party (either an employee or person employed under any other arrangement, who violates the prohibition of violence and harassment) (art. 12, par. 2, Law 4808/2021).

The Company receives, investigates and manages every complaint or relevant report demonstrating zero tolerance to violence and harassment, with confidentiality and in a manner that respects human dignity, and does not interfere with the receipt, investigation and management of such complaints or reports. Support and access is provided to any competent public, administrative, or judicial authority during the investigation of such incident or conduct, if requested by them.

Finally, any affected person, who reasonably believes that there is an imminent serious danger to their life, health or safety, has the right to leave the workplace for a reasonable period of time without loss of salary or other adverse consequence, provided they first notify the Company in writing, stating the incident of violence and harassment and the incidents that justify their belief. However, if the risk has ceased to exist and the affected person refuses to return to the workplace, the Company may appeal to the Labour Inspectorate with a request for the resolution of the dispute.

## **9. Designation of reference person ("liaison")**

The designated reference person responsible for guiding and informing employees regarding the prevention and management of violence and harassment in the workplace is the Company's Head of Human Resources.

## **10. Support for employees-victims of domestic violence**

The Company safeguards employment and supports employees-victims of domestic violence in retaining their jobs and reintegrating smoothly after such incidents, providing the possibility, upon request of the employees-victim of domestic violence, to grant special leave or offer flexible work arrangements.

### **Complaint reception and investigation procedure**

The Company adopts a dedicated complaints and reports procedure for the management, reception and investigation of incidents involving violence and harassment. This process ensures:

- a) the protection of the victim and respect for human dignity,
- b) appropriate support and legal assistance when needed,
- c) safe and easily accessible communication channels for receiving complaints, as well as the designation of the responsible individuals within the company for the receipt and examination of complaints and updating the complainants,
- d) investigation and examination of complaints with impartiality and protection of confidentiality and personal data of victims and accused individuals,
- e) the prohibition of retaliation and further victimisation of the affected person,
- f) the description of consequences on confirmed violations,
- g) cooperation with and provision of all relevant information to competent authorities, if requested.

### **11. Communication channels - responsible persons**

The person responsible for receiving the reports is the Company's Head of Human Resources.

The complaint-report is submitted to the designated recipient either verbally or in writing.

If the case concerns the behaviour/actions of the designated recipient, then communication is made only with the Company's representative.

Any report or complaint submitted by a third party (besides personnel) is addressed to the designated recipient.

The designated recipient informs the Company's representative of the complaint-report.

Grievances/complaints/reports regarding acts of harassment or retaliation that constitute a Policy violation will be accepted in writing or verbally, and anonymous complaints will be taken seriously and investigated. Anyone who has observed any incident of violence or harassment is obliged to report it immediately.

### **12. Investigation and examination of complaints**

Internal complaints of violence or harassment are investigated with swiftness, impartiality, strict confidentiality and protection of personal data.

All employees are obliged to maintain strict confidentiality in case they submit information as

part of a complaint investigation.

The designated recipient investigates the facts of each complaint in an objective and direct manner while maintaining confidentiality, collecting all necessary facts and testimonies.

The protection of personal data and confidentiality applies to all tasks and obligations of the designated recipient.

If necessary, medical and psychological evaluation and support must be provided immediately to the complainant.

Following the evaluation of the report-complaint, the designated recipient submits their conclusions and relevant proposals to a Committee consisting of the Managing Director, the Deputy Managing Director and the Executive Director of the complainant's Division. The Committee decides on whether or not a violation has occurred and the appropriate action plan. Depending on the case, this may include further investigation, protective measures implemented in a safe and appropriate manner, referral to local authorities, conflict/complaint resolution procedure, etc., and informs the complainant.

In the event of serious reports or allegations, the Committee may submit a report to the competent local authority and seek its advice. Depending on the case, judicial proceedings and/or other legal proceedings may be initiated

### **13. Cooperation and provision of information to competent authorities**

The Company provides assistance and access to any competent public, administrative or judicial authority, during the investigation of such incidents and if requested by those authorities.

### **14. Prohibition of retaliation against the affected person**

During the complaint reception and investigation process, all involved parties (victims, complainants, witnesses, etc.) are protected from further victimization or retaliation, adverse treatment, or detrimental changes of working conditions in consequence of their contribution, in any way, to the investigation of a complaint concerning violence and harassment.

### **15. Description of consequences in case of confirmed violations**

When an employee or person employed under any other arrangement violates the Policy, the Company is obliged to take the necessary offerings and proportionate measures on a case-by-case basis against the accused party, in order to prevent and avoid the repetition a similar incident or behaviour. Such measures may include a compliance warning, change of position, schedule, location or method of work, or termination of the employment or cooperation relationship (without prejudice to the abuse of rights prohibition under Article 281 of the Civil Code).

### **16. Useful contact and information details**

Head of Human Resources ICAP OUTSOURCING SOLUTIONS, Natasa Mousa	210-3362008 <a href="mailto:nmousa@icap-os.com">nmousa@icap-os.com</a>
Labour Inspectorate Complaint hotline	1555

Labour Relations Inspection Department of Kallithea	210 9599985,-6 Arapaki 6, 17673 Kallithea <a href="mailto:tkekalith@yeka.gr">tkekalith@yeka.gr</a>
Ombudsman (or Citizen's Advocate)	213-1306600 Chalkokondyli 17, 10432 Athens <a href="https://www.synigoros.gr/el/anafora/ipovoli-anaforas">https://www.synigoros.gr/el/anafora/ipovoli-anaforas</a>
SOS helpline for psychological support for women victims of violence or third parties	15900
Website of the State on issues of sexual harassment, abuse, and abuse of power, and the actions to combat them	<a href="https://metoogreece.gr/">https://metoogreece.gr/</a>