



ANTI-VIOLENCE & ANTI- HARASSMENT POLICY AT WORK
ALSO FOR THE HANDLING OF INTERNAL COMPLAINTS ABOUT INCIDENTS OF VIOLENCE
AND HARASSMENT

Of the company
"EMEK HELLENIC MECHANICAL CONSTRUCTIONS AND EQUIPMENT SA"
(G.E.MI. reg no. 112598708000)

The Company "EMEK HELLENIC MECHANICAL CONSTRUCTIONS AND EQUIPMENT SA" and the distinctive title "EMEK S.A." (hereinafter "**Company**"), adopts and implements, in accordance with articles 9 and 10 of Law 4808/2021, this policy (hereinafter "**Policy**") to prevent and fight against violence and harassment in the workplace and to handle any complaints of incidents of violence and/or harassment.

Any amendment to this Policy must be approved by the Company's Board of Directors.

FIELD OF APPLICATION – PURPOSE OF THE POLICY

The Policy concerns all employees of the Company, regardless of the more specific contractual status that connects them with it, whether it is a contract of dependent work or a project contract, independent services, salaried personnel, even to those employed through third party service providers, as well as to people attending training, including trainees and apprentices, volunteers, employees whose employment relationship has ended, as well as people applying for work (hereinafter "**Employees**").

It also applies to the Company's subsidiary in Bulgaria, subject to any variations for individual matters that are adapted due to the local regulatory framework.

The purpose of the Policy is, on the one hand, to create a safe working environment, on the other hand, to ensure that an effective mechanism is implemented to support and protect Employees who report/complain incidents of violence or harassment, and for the effective management of relevant reports/complaints.

PREVENTING AND FIGHTING VIOLENCE AND HARASSMENT AT WORK

1. GENERAL PROHIBITIONS – BASIC PRINCIPLES

1. The Company respects the rights and diversity of the Employees
2. The Company has zero tolerance for violence and harassment, wherever it comes from, and has a duty to protect its Employees from violence by third parties
3. The Company does not discriminate - nor tolerate any form of discrimination or harassment - on the basis of sex, physical or mental disability or disease, appearance, religion, race, colour, social class, nationality, political opinion, age, marital status, sexual orientation or other characteristics .
4. The working climate must be inspired by respect, solidarity, justice and understanding.

5. All forms of violence and harassment occurring during, connected to or arising from work, including gender-based violence and harassment and sexual harassment, are expressly, totally and absolutely prohibited;
6. Any form of harassment, intimidation, psychological abuse, aggressive or unjustified behavior, offensive, annoying and generally unwanted behavior against any Employee, by a supervisor, colleague and/or third parties is absolutely not tolerated, and is treated as an offense, with serious penalties ,
7. Prejudiced thinking is prohibited.
8. Any Employee who is the recipient or witness of such incidents must immediately inform the Company.
9. Relevant matters are handled with discretion, confidentiality and efficiency.

Violence and/or harassment may take place in particular:

1. In the Company's workplaces, public and/or private, as well as in places where the Employee provides work (including all kinds of Company construction sites), receives pay, takes a break (especially for rest or for food), in personal hygiene areas and care, in any changing rooms or accommodation provided by the Company.
2. In the Employees' transportation to and from their work, in other transportations, travel, training, as well as in the events and social activities related to the work.
3. During work-related communications, including those made through information and communication technologies.

2. ASSESSMENT / EVALUATION OF RISKS OF VIOLENCE AND HARASSMENT

The most important factor in dealing with violence and harassment is prevention.

A necessary condition for prevention is the performance of risk assessments for the safety and health of Employees and the elimination of phenomena of violence/harassment.

The Company carries out risk assessments for the safety and health of the Employees already on the basis of par. 1a' of article 43 of Law 3850/2010 (Code of Laws on health and safety at work), while, when assessing the risks of violence and harassment, factors such as:

1. the conditions and organization of work and the management of the Company's human resources,
2. the way it manages its human resources (fair distribution of jobs between men and women, regardless of age or other characteristics),
3. the organizational structure of the Company,
4. the physical arrangement of the workplaces and parking spaces, warehouses and other facilities of the Company (e.g., if there are "dark" places or isolated workplaces, if the workplaces are adequately monitored for safety reasons , etc.),
5. the degree of interaction of the Employees with third parties (customers, suppliers, etc.),
6. the interpersonal relations of the Employees,
7. the extent to which there may or may not be discrimination, abuse of power and gendered cultural and social norms that support violence and harassment;
8. the multiple risks women face in their work, as well as the conditions under which they work in the Company (positions they take, etc.),
9. the extent to which occupational safety and health programs address the needs and concerns of Workers in the workplace;

10. the general conditions (e.g. economic crisis and level of unemployment generally act as a deterrent for reporting incidents of violence/harassment).

The Company takes violence and harassment and related psychosocial risks into account when managing occupational safety and health and ensures that these risks are systematically (re-assessed).

3. MEASURES TO PREVENT, CONTROL, LIMIT AND ADDRESS THE RISKS OF VIOLENCE AND HARASSMENT AND TO MONITOR RELATED INCIDENTS

To reduce the possibility of the occurrence of violence/harassment risks, the Company takes measures:

*PREVENTIVE
(Actions against
violence and
harassment and
cultivating business
standards and values
that do not allow
such incidents to
occur)*

1. Creation of a diverse and inclusive working environment, with respect and presence of women in the management of the Company.
2. Informing Employees about what constitutes violence and harassment, raising awareness and providing them with targeted information and training regarding typical forms/behaviors, their causes and consequences.
3. Taking measures of a technical nature (adequate lighting, etc.).
4. Ensuring that employees have the necessary training and information to perform their duties, particularly in jobs that have a higher risk of incidents of violence and harassment.
5. Investigating the extent of potential risks, assessing the likelihood of their occurrence and clarifying the nature of the related problems.
6. Formulation of relevant policy and provision of effective reports/complaints procedures.
7. Effective communication of the Company's standards and values at all levels (distribution/posting of the Policy, notification in case of updates/modifications, etc.).
8. Ensuring adherence to business standards and values by all Employees (by adopting relevant contractual clauses, continuous control and monitoring of compliance, etc.).
9. Ensuring that senior managers act as role models.
10. Cultivating a working climate with interpersonal conflicts as limited as possible.
11. Including the handling of interpersonal conflicts between Employees, in the tasks and responsibilities of their administrative officers.
12. Selecting managers with the skills to manage such conflicts and resolve disputes.
13. Continuous monitor for any abuse of power phenomena.
14. Participation of Employees and their representatives, especially women, in preventive actions and the formulation of the relevant policy.
15. Conducting, if deemed necessary, confidential and anonymous surveys on the working climate, transparently, so that

employees know how the survey data will be used and how the results will be made available and, subsequently, use of the results to inform the preventive measures.

16. Establishing transparent non-discriminatory recruitment and promotion processes.
17. Adherence to a merit-based recruitment and promotion policy, establishing specific objective criteria for the selection of a candidate for a job and the progress of existing employees, in order to avoid forms of harassment that occur as a condition of employment or promotion.
18. Creating conditions that prevent or reduce the exposure of Employees to violence and harassing behavior – Limiting the factors that generally favor violent/harassing behavior.
19. Ensuring professionalism and scientific rigor in the investigation and settlement of related complaints.
20. Creating a climate of confidentiality and relationships of trust so that victims and witnesses can report violence/harassment without fear.

*RESTRICTIVE
(Actions that minimize or end the consequences of any phenomena of violence/harassment)*

1. Management functions as a team, in a participatory model.
2. Cultivating a positive team climate.
3. Task prioritization.
4. Clearly identify individuals designated as responsible for resolving disputes and conflicts.
5. Staff training in violence/harassment incident management procedures.

*CORRECTIONS
(Measures in case violence/harassment occurs)*

1. Provision of specific procedures, in accordance with the Company's Policy for the Management of Internal Complaints for Incidents of Violence and Harassment.
2. Provision of legal consequences for the perpetrators of such incidents.
3. Guidance and support for victims of violence and harassment or domestic violence to reintegrate into the workplace.

The Company evaluates on a regular basis the effectiveness of the applied preventive measures and countermeasures and reviews/updates the assessment of risks and measures.

4. COMPANY OBLIGATIONS

1. Ensuring the health and safety of Employees and third parties.
2. Protection of Employees from acts of violence or insult to their personality or damage to their morals, prevention and limitation of any manifestations of violence and harassment.
3. Compliance with the legislative and regulatory provisions regarding the health and safety of Employees and their protection from violent/harassing behaviours,

4. Taking measures to protect the health and safety of the Employees, including the activities of prevention of occupational risks, information and training, as well as the creation of the necessary organization and the provision of the necessary means.
5. Supervision of the correct implementation of the measures.
6. Adaptation of measures according to changes in circumstances.
7. Continuous improvement of existing situations.
8. Implementation of the instructions of the competent authorities and generally facilitating their work.
9. Ensuring the maintenance and monitoring of the safe operation of media and facilities.
10. Encouraging and facilitating the training and education of Employees and their representatives.
11. Taking preventive measures (avoidance and assessment of risks).
12. Adaptation to technical developments.
13. Providing Employees with information related to the potential risks of violence and harassment in the workplace and related prevention and protection measures, including the obligations and rights of Employees and the Company.
14. Providing the appropriate instructions to the Employees.
15. Posting in workplace, of information about the procedures that exist within the company, for reporting and dealing with violence/harassment.
16. Cooperation with the occupational physician in matters of work physiology and psychology, including the prevention of violence and harassment at work, sexual harassment, ergonomics and hygiene at work, arrangement and shaping of positions and the work environment and organization of the production process.
17. Providing on a case-by-case basis, in the context of direct support, medical and psychological assessment and support to Employees who may be subjected to violence / harassment / domestic violence.
18. Receiving, investigating and handling complaints/reports confidentially and with respect for human dignity.
19. Facilitation of receipt, investigation and management of complaints / reports.

5. IN PARTICULAR, INFORMATION AND AWARENESS-RAISING MEASURES FOR EMPLOYEES

1. The Company promotes the education and training of Employees regarding the importance of the principle of equal treatment between men and women, the prohibition of discrimination due to gender or sexual orientation and the prevention, treatment and combating of harassment.
2. The Company communicates the Policy to Employees and keeps it posted in workplaces and accessible on its internal network.
3. The Company takes the appropriate measures so that the Employees and their representatives have at their disposal all the necessary information in relation to:
 - a) the legislation in force regarding the health and safety of Employees and how it is applied by the Company,
 - b) safety and health risks, as well as protection and prevention activities and
 - c) the measures taken.
4. The Company takes the necessary actions so that the appropriate information is also provided to the employees of any other companies that perform work at its facilities by the respective employers.
5. The Company ensures that each Employee receives, at no cost to him, appropriate and sufficient training in the field of safety and the protection of his health and

integrity, including his protection against phenomena of violence and/or harassment, in particular in the form of information and instructions on occasion:

- a) of his recruitment,
- b) any change of duties,
- c) change of his working conditions,
- d) changing equipment / technology or introducing new technology specifically related to his job position or duties.

6. OBLIGATIONS OF EMPLOYEES

1. Implementation of the Company's rules on health, safety and protection against violence/harassment.
2. Care, where possible, for the safety and protection of their health and integrity , and for the safety and protection of the health and integrity of other persons affected by their acts or omissions in the course of their employment, in accordance with their training and with the appropriate instructions of the Company.
3. Immediate reporting of all situations that can reasonably be considered to present an immediate and serious risk to their safety and the protection of their health and integrity.
4. Contribution to the Company so that it becomes possible to fulfill the duties or requirements imposed by the legislation on safety, health and protection against violence and harassment and/or by the competent authorities.
5. Monitoring the training programs carried out by the Company on health, safety and protection against violence and harassment.
6. Cooperation with the Company's occupational physician within the scope of his responsibilities.

7. EMPLOYEE RIGHTS

An employee who may be affected by an incident of violence and harassment, even if the relationship in the context of which the incident or behavior allegedly occurred against him has ended, has:

- ❖ the right to appeal before the Labor Inspectorate, the right to report to the Public Defender of Rights as a body promoting and supervising the principle of equal treatment, within the framework of his statutory powers, the possibility of contacting the service of direct psychological support and counseling for female victims of gender-based violence, as well as right to file a complaint under this Policy, right to judicial protection, right to appeal in general to any competent Public Authority.

Any person who suffers an incident of violence and harassment against him, has the right to leave the workplace for a reasonable time, without loss of salary or other adverse consequence, if, in his reasonable belief there is an imminent serious risk to life, health or safety, in accordance with the provisions of article 12 of Law 4808/2021, informing the Company beforehand in writing and mentioning both the incident of violence/harassment and the incidents that justify his belief that there is an imminent serious risk to life, health or his safety.

8. RESPONSIBLE – CONTACT PERSON FOR VIOLENCE/ HARASSMENT ISSUES

Ms. Patiti Elpida, Vice-President of the Board of Directors, is designated as the person in charge - reference person for issues related to this Policy and liaison for the guidance and information of Employees regarding the prevention and treatment of violence and harassment at work.

Employees' access to the above person is easy and immediate and can be done via phone 210 5595084 or by email at: h.patiti@emek.gr or in person at her office.

The personal data that may come to the knowledge of the above-mentioned person during the exercise of her role as a reference person - employee liaison are protected at all times in accordance with the law and this Policy.

9. SUPPORT FOR WORKING VICTIMS OF DOMESTIC VIOLENCE

- ❖ The Company supports its Employees who may be facing domestic violence and assists them, by any appropriate means, by reasonably adjusting the working arrangements on a case-by-case basis. In case an Employee is concerned about the risks of domestic violence in his/her workplace or if, for example, he/she has taken restrictive measures or related protection against his/her partner or ex-partner, and generally if a victim of domestic violence is affected by it at his/her work, the Company will provide him/her with case-by-case assistance in case of a relevant need. E.g.:
 - a) will take practical actions / safety planning (eg providing a safe parking place or temporarily reorganizing his/her works);
 - b) will assist in the level of information regarding specialized services and support,
 - c) will refer the Employee to specialized domestic violence, safe housing, legal aid and counseling organizations,
 - d) will grant leave on a case-by-case basis for the Employee to access support from domestic violence organisations, receive counselling, attend court, attend police or other authorities, etc.;
 - e) will possibly make flexible arrangements for his/her work for a specified period of time,
 - f) will provide him/her with medical and psychological assessment and support where appropriate, within the framework of direct protection.

HANDLING OF INTERNAL COMPLAINTS / REPORTS OF INCIDENTS OF VIOLENCE / HARASSMENT

1. BASIC PRINCIPLES

When handling reports/complaints:

1. The Company ensures trust and safety in the working environment.
2. The Company encourages reporting/complaints in case of violence/harassment.
3. The Company receives and does not prevent the receipt of reports/complaints.

4. The Company collects and investigates all evidence and information related to reports/complaints, and investigates and examines the complaints with impartiality and respect for human dignity.
5. The Company provides reasonably substantiated responses to submitted reports/complaints and takes immediate measures to protect the victim.
6. The anonymity and personal data of petitioners / complainants are protected.
7. The position of petitioners / complainants in the Company or their future professional development is not affected by the fact of submitting a report/complaint.
8. Reports/complaints are made without promise of payment or existence of any remuneration to the petitioner/complainant.
9. Reports/complaints are treated with respect for the personality of the reporter/complainant, with trust, transparency, decency, honesty and professional conscientiousness.
10. The Company investigates reports/complaints diligently and without discrimination, responds to each report with care and demonstrates courtesy and understanding.
11. The Company provides guidance on existing communication mechanisms.
12. The Company ensures the protection of the details of the complainant and any third party named in the report/complaint.
13. The Company exhausts all possibilities of immediate settlement of the report/complaint.

2. COMMUNICATION PROCEDURE - SUBMITTING COMPLAINTS - COMPETENT PERSONS

A report of an incident of violence/harassment can be made, in writing or verbally:

- a) By e-mail to the address: h.patiti@emek.gr
- b) Through a complaint box located at the entrance to the Company's offices,
- c) With a personal meeting, at the request of the complainant, with Ms. Kotrotsiou Olga, secretary, or the occupational physician, or his/her immediate Supervisor, who are obliged to competently forward the report/complaint to Ms. Patiti Elpida, Vice President of the Board of Directors, or any future employee in that position,
- d) By phone (anonymously or by name) on the number 2105595084.

In the event that the complaint has been submitted by e-mail, this is kept in the company's file for one (1) year and after the expiry of this period of time it is deleted.

The Company ensures the proper and secure operation of the communication channels in question.

At any stage of the process, the affected parties can of course also submit a complaint to the competent administrative authorities within their jurisdiction.

3. INVESTIGATION AND REVIEW OF COMPLAINTS

1. Reports/complaints can be named or anonymous. Due to the nature of the incidents, it is clearly preferable to submit named complaints so that the handling of the incidents can be more efficient and facilitate the conduct of the relevant investigation and the taking of the relevant measures.
2. Complainants must act responsibly in order to determine whether an action needs to be reported and investigated further.

3. Each complaint must provide sufficient, accurate and relevant information in terms of names, dates, locations, witnesses, description of incidents, in order for a reasonable investigation to be conducted.
4. The complainant is not expected to prove the truth of his allegation, but that there are sufficient grounds for concern based on the information available to him/her at the time of the report.
5. The investigation of complaints is the responsibility of Ms. Patiti Elpida, under the supervision of the Managing Director. After receiving the complaint:
 - Checking and evaluating the seriousness and credibility of the complaint.
 - Investigating the complaint impartially and responsibly.
 - Formulating proposals to resolve the matter within a reasonable period of time, which cannot exceed thirty (30) days.
 - Informing the parties involved, after completion of the investigation, of its findings and the necessary measures.
 - Keeping a record of the complaint, relevant documentation, any findings recorded. The file in question is kept by Ms. Kotrotsiou Olga, in electronic or paper form, for a period of five (5) years from the submission of the report/complaint, a period necessary for the effective management of complaints and the rational treatment of issues that arise, including incident assessment and analysis procedures in order to address and prevent incidents of violence/harassment in the future.
 - The information of the Board of Directors the company.
6. Ms. Patiti Elpida,
 - informs the petitioner/complainant in a reasonable time and as directly as possible.
 - may request further information and maintain communication with the petitioner/complainant as required.
7. The investigation is conducted with impartiality, respect and discretion towards the persons involved. All persons participating in the investigation must cooperate harmoniously and substantially, in order to effectively resolve the mentioned/ reported incidents.
8. The investigation must be completed within a reasonable period of time, depending on the nature and complexity of the matter reported.
9. Any delay must be adequately justified.
10. If the report/complaint relates to a person involved in the investigation process or one of these persons has a conflict of interest, then that person shall recuse himself from the investigation of the report/complaint and be replaced.
11. A complaint may be rejected in particular if:
 - The reported conduct does not fall within the scope of this Policy. The complaint is not made in good faith or is manifestly malicious. There is insufficient information to further investigate and evaluate the complaint. The matter for which the relevant complaint was lodged has already been addressed.
12. The Company's senior management/managers:
 - a) inform their subordinates about this Policy and related procedures,
 - b) encourage their subordinates to adopt a positive, open work attitude so that they feel they can easily express their concerns and
 - c) apply the decisions of the competent bodies of the Company to deal with possible reports/complaints.
13. Employees must:

- a) be aware of this Policy and related procedures,
 - b) submit bona fide and substantiated reports/complaints.
14. The Company carries out a qualitative and quantitative analysis, in anonymized form, of the data related to the handling of reports/complaints, in order to:
- a) to identify the persons to whom reports/complaints most often concern,
 - b) to identify and analyze the generative causes,
 - c) to examine whether other processes or functions of the Company are possibly affected,
 - d) to submit proposals for corrective measures and
 - e) to take corrective measures, where this is considered reasonable.

4. PROHIBITION OF RETALIATION AND FURTHER VICTIMISATION

1. No person who makes a complaint/report in good faith will be subject to harmful consequences, such as unjustified disciplinary action, victimization, threats or other adverse treatment.
2. It is prohibited and invalid to end or in any way terminate the legal relationship on which the employment is based, as well as any other adverse treatment of an Employee, as long as it constitutes retaliatory behavior or a countermeasure for an incident of violence and harassment, i.e. when it is done as a reaction to a protest, complaint, testimony or any other action, either within the Company or before a court or other authority.

5 . CONSEQUENCES OF VIOLATION

1. If an Employee violates the prohibition of violence and harassment, the Company will take the necessary and appropriate measures against the complainant, in order to prevent a similar incident or behavior from recurring.
2. These measures include in particular:
 - a) the oral or written observation,
 - b) the written reprimand / compliance recommendation,
 - c) the change of position,
 - d) the change of hours,
 - e) the change of place or way of providing work,
 - f) the additional training of the reported person in matters of prevention and combating violence and harassment at work
 - g) placing the accused person on unpaid leave for a reasonable period of time upon agreement of the parties,if it is a minor offense,
 - a) fine up to a rate of 25% of the salary corresponding to a working day or on the employee's daily salary
 - b) mandatory absence from work up to ten (10) days,if the employee committed a serious offense repeatedly.
3. In all other cases in which the person who has committed the violation is not a member of the Company's staff, but falls under the scope of the present as stated above, his cooperation in any way with the Company will be immediately interrupted, in accordance with the provisions of the respective agreement between the parties and any applicable legislation

4. In the event that the violation originates from a colleague of the complainant, the Company must immediately take all necessary measures to protect the personality of the affected Employee, while it is not excluded that these behaviors can also be audited at a criminal level and, therefore, in the event that the violation constitutes a criminal offense at the same time, the Company may initiate criminal proceedings against the offender, regardless of the imposition of any disciplinary sanction as mentioned above.
5. In any case, in relation to the imposition of disciplinary sanctions, the provisions of article 36 of the Company's Internal Labor Regulations shall apply.

6. COOPERATION WITH COMPETENT AUTHORITIES – CONTACT DETAILS OF COMPETENT AUTHORITIES

As the case may be, the Company may cooperate (either on its own initiative or following an appeal by the complainant to the Labor Inspectorate or the Public Defender of Rights or another authority or body) with any legal and competent authority or body and, depending on the case, legal proceedings may be instituted process and/or any other legal actions to be taken.

Competent bodies – Contact details:

Labor Inspectorate

Citizen service telephone line: 1555

Independent Department for monitoring the phenomena of violence and harassment at work
28th of October 37, Athens, PC 104 32

<https://www.sepenet.gr/liferayportal/2>

Public Defender of Rights

17 Chalkokondyli, Athens, PC 104 32

tel .: 2131306600

<https://www.synigoros.gr/>

Service of direct psychological support and counseling for female victims of gender-based violence

SOS hotline – violence against women: 15900

Greek police

Telephone line: 100

www.astynomia.gr

Department of Gender Equality at Work

Directorate of Individual Regulations of the Ministry of Labor and Social Affairs

29 Stadiou, Athens, PC 10559

2131516384

General Secretariat of Family Policy and Gender Equality

8 Dragatsaniou str., Athens, PC 105 59

Tel .: 21 0331 7305

<https://isotita.gr/>

7. PROTECTION OF CONFIDENTIALITY OF INFORMATION AND PERSONAL DATA REPORTS AND COMPLAINTS

1. The Company ensures the protection of the confidentiality of the identity of the complainant and any third party named in the report/complaint.
2. Personal data not related to the nature of the complaint are not further processed and are deleted.
3. The Company ensures that all necessary measures are followed in order to ensure confidentiality and limit the risk of leakage or loss of company data.
4. The personnel involved in the reception, management, examination of the complaints or reports of the affected persons, have the responsibility to ensure the confidentiality of the information they receive and/or use in the performance of their duties in the context of the investigation of the complaint/report, in order not to undertake actions that may lead to the disclosure of the Company's confidential data.
5. The data of all those involved are subject to processing for the sole purpose of ascertaining the validity or otherwise of the specific report/complaint and to investigate the specific incident.
6. Access to data contained in reports/complaints for the purposes of investigating or managing the reports/complaints may only be granted to those involved in the management and investigation of the incident, the persons included in the report/complaint, witnesses and anyone else who has Legal interest.
7. The extent of access granted is decided on a case-by-case basis by Ms. Patiti Elpida and varies depending on the status of the complainant and the seriousness of the case.
8. Where access is granted, details of the complainant and witnesses are not shared unless they have given express consent and the report/complaint has been proven to be malicious.
9. The Company takes all necessary technical and organizational measures to ensure confidentiality and limit the risk of data leakage or loss and to protect relevant personal data.
10. Any processing of personal data under this Policy is carried out in accordance with applicable national and EU legislation.