



# Policy for the Elimination of Violence and Harassment at Work

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2.0	05/06/2024	2024 Rebranding
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## 1 General

The Company adheres to all measures and obligations concerning the application of the provisions of Part II of Law 4808/2021 for the prevention, confrontation and combating of any form of violence and harassment; thus, contributing to the creation of a working environment that respects, promotes and guarantees the right of every person to a workspace without violence and harassment.

It refers to all forms of violence and harassment that occur during work, whether related to or arising from it, including violence and harassment based on sex and gender as well as sexual harassment.

It is clarified that any form of violence and harassment between the persons listed below under 3., even if it takes place outside of time and place of work, is considered to be related to work and therefore falls within the provisions hereof (such as travel from and to work, travel, education, and work-related events and social activities).

For the purpose of the present Policy, the terms “violence and harassment”, “harassment” and “harassment based on sex and gender” have the meaning defined in article 4 par. 2 of Law 4808/2021.

Indicatively as behaviors included within the meaning of “violence and harassment” are (among others) the following:

- any action or behavior that (may) intimidate, harm, or insult the dignity of any of the following under Article 3. persons (either by abusive, derogatory comments, unfair physical contact, glances, gestures, comments, invitations or with distribution of offensive material)
- jokes that include expressions of a sexual nature and / or expressions derogatory to vulnerable social groups and / or to people of different ethnic backgrounds
- comments with sexual connotations
- sexual proposals as well as the offer of compensation for their acceptance, as well as the threats in case of their rejection and / or the desire of the affected person to denounce behaviors that are part of this policy
- obscene gestures
- posting on social media of any comment with obscene / offensive / derogatory content
- sending by any technical means (communication platform) of image material / video / audio material of offensive and / or sexual content
- social isolation
- undermining or deliberately obstructing a person's work
- violation of personal belongings or work equipment
- any other act that could be considered as part of the terms of violence and harassment - as they arise from the aforementioned legislation.

## 2 Purpose of the Policy - Declaration of zero tolerance for any form of violence and harassment at work

The purpose of this policy is to create and consolidate a work environment that respects, promotes, and guarantees the human dignity and the right of every person to a world of work without violence and harassment. The Company declares that it recognizes and respects the right of every employee in a work environment without violence and harassment and **ultimately, declares, its zero tolerance for any form of violence and harassment in the workplace.**

## 3 Scope of Policy

This policy is adopted in accordance with articles 9 and 10 of law 4808/2021 and the regulatory legislation implementing them and applies to the persons of par. 1 of article 3 of law 4808/2021.

## 4 Preventing and combating violence and harassment at work

### 4.1 Risk assessment

The Company conducts regularly - at least once per year - an occupational risk assessment for violence and harassment, compiled by its competent associates, the results of which are communicated to all employees of the Company in an appropriate manner.

### 4.2 Defining the measures taken by the Company for the prevention, limitation and mitigation of risks but also for the monitoring of such behaviors - Description of the information and awareness actions of the Company's staff.

#### 4.2.1 The Company organizes at regular intervals training seminars for its staff and the management in order to inform them:

- (a) for the healthy behavior patterns at workplace
- (b) for their rights (and obligations in particular of the executives in relevant positions of responsibility) in the event of an incident of violence and harassment
- (c) for the proper management of incidents of violence and harassment
- (d) for any vulnerable categories of employees

The speakers of the above seminars are the presumably competent external collaborators of the Company (indicatively lawyers, psychologists, doctors, etc.) but possibly also representatives of voluntary organizations.

In addition to the above seminars, the Company is committed to providing staff with information in accessible formats (sending relevant e-mail or distributing leaflets) on the risks of violence and harassment in the workplace and on the relevant procedures for reporting such incidents.

#### 4.2.2 The Company regularly receives and reviews the access protocol and technical measures to ensure a safe workplace. Indicatively, the Company ensures the existence and maintenance of adequate lighting in all its areas, especially the difficult to access areas, as well as the controlled access to its buildings through the reception staff, the installed Access Control systems and the closed circuit television (CCTV) operation in the main entrances of the floors of the buildings that there are workplaces for the Company's staff.

#### 4.2.3 The Company ensures the consolidation by the staff and the Management of the values of respect for human dignity, cooperation, and mutual support through the provision of instructions and advice (written or oral) whenever it deems appropriate or necessary.

#### 4.2.4 The Company organizes regular meetings of the staff and the Management (either in total or in groups), in which the person of article 6. also participates, in order to discuss any problems

that the above persons have identified but also to deal with potential risks related to violence and harassment in the workplace.

**4.2.5** The Company encourages and contributes (through the proper organization of working time and / or the financing of the relevant actions) to the participation of the responsible executives of the Management in training seminars regarding the identification and management of the risks of violence and harassment at work.

**4.2.6** The Company regularly evaluates the above measures and conducts appropriate revisions. The Company encourages employees, in the context of the above review of preventive measures to contact their immediate superiors or senior management and to propose the measures that they deem best to serve the purpose of creating a safe working environment.

## **5 Information regarding the rights and obligations of the employees and the Company but also regarding the procedure to be followed in case of occurrence or reporting of such behavior**

**5.1** The remedies of the person affected (according to the above under 3. provision) by an incident of violence and harassment in the context described above (under 1.) are:

- Providing judicial protection by appealing to the competent civil and / or criminal courts to satisfy the rights provided by law to the affected person depending on the case.
- Submitting a complaint and application for a labor dispute to the Labor Inspectorate, within the framework of its legal responsibilities (through the citizen service line 1555).
- Report to the Greek Ombudsman, within the framework of its legal responsibilities (either in person at 17 Chalkokondyli Street, Athens or through the electronic submission of the report on the website [synigoros.gr](http://synigoros.gr)).
- Complaints within the Company in accordance with the complaints management policy as per the provisions of Article 7 of this Policy.
- Departure from the workplace for a reasonable period of time of the person who receives violence and harassment behaviors, without deprivation of salary or other adverse consequences, as long as in his/hers reasonable belief there is an imminent serious danger to his/her life, health or safety.
- Receipt of immediate psychological support to women who are victims of violence and harassment from the service of immediate psychological support and counseling of women victims of gender-based violence on the SOS Line 15900.
- Receipt of immediate psychological support addressed to the entire population experiencing an issue of psychosocial nature and especially to individuals and vulnerable populations who are going through some form of crisis or emergency, on the Immediate Social Helpline 197

The Company ensures the posting and maintenance in a visible place of the Company, so that the staff is informed, of the data regarding the above contact details of the competent administrative authorities to which every affected person has the right to apply (Labor Inspectorate, Greek Ombudsman).

### **5.2 Obligations of the Company**

The obligations of the Company in case of reporting an incident of violence and harassment in the workplace (as defined herein) are described below under provision 7 in conjunction with the relevant provisions of Law 4808/2021.

## **6 Designation of a liaison officer ("liaison") responsible for guiding and informing staff on issues related to the prevention and dealing with all forms of violence and harassment**

The respective HR Business Partner of PeopleCert Group of companies is defined as a liaison-reporting person (hereinafter "Reporting Person"), responsible for guiding and informing the staff on the issues of prevention and dealing with any form of violence and harassment. Any person from the above mentioned (under 3) can address to the specific person for the above issues either in person meeting, or by e-mail to the email address [raiseyourissue@peoplecert.org](mailto:raiseyourissue@peoplecert.org) or by phone call to: +30 210 3729099.

## **7 Procedure for managing internal complaints about incidents of violence and harassment**

**7.1** Reception of complaints - identification of a person for the receipt of complaints but also for informing the complainants

**7.1.1** The Reporting Person is responsible for receiving complaints that take place under the present policy. It is noted that any affected person has the right to file a complaint either in writing (and by sending e-mail to the above Email address under 6.) or orally-in person or by phone call to the above phone number under 6.

**7.1.2** The Reporting Person is obliged to inform the complainant about his/her rights in accordance with the above-mentioned under 5.1 and to immediately forward the complaint to the Human Resources Director of the Company.

**7.1.3** The Company is committed to maintaining the confidentiality and protection of Personal Data of those involved in incidents of violence and harassment. In this context, the access to the electronic file of the complaint (and the other files related to the specific complaint) will take place only with the use of a password, which will be available exclusively to the Reporting Person, the Human Resources Director and the Chief Executive Officer of the Company. Any relevant files in physical form shall be stored in a special locked space, which shall be accessible only to the above persons.

**7.1.4** The above persons, who shall be informed of the complaint and the relevant data in the context of their responsibilities, shall not reproduce in any way the complaint or part of it, unless this is necessary in the context of this policy and / or the during their cooperation with the competent administrative and judicial authorities as described below (under 8.).

**7.1.5** In case the complaint is directed against the Reporting Person, the complainant may file a complaint to the respective manager of the Reporting Person according to the Organization Chart notified to the employees of the company (who will be obliged to inform the complainant in accordance with the provisions of condition 5.1).

**7.2** Impartial investigation and examination of complaints - Prohibition of retaliation and further victimization of the complainant

**7.2.1** Upon receipt of the complaint, the Reporting Person undertakes to remove any obstacle and hesitation of the complainant regarding the complaint and not to obstruct or, in any case, impede in any way, the receipt of the complaint.

**7.2.2** The Human Resources Director investigates and examines the reported incidents with objectivity, impartiality and respect for the human dignity of both the complainant and the accused person.

**7.2.3** It is expressly stated that any adverse treatment of the complainant, which constitutes retaliatory behavior or a countermeasure to the complaint made in the context of the present

policy, (explicitly including the termination of his/her employment contract) is strictly prohibited.

### 7.3 Complaints examination procedure - Consequences in case of violation of this Policy

**7.3.1** Following the transmission and study of the complaint, the Human Resources Director of the Company invites the affected person and any witnesses of the incident to a hearing without delay.

**7.3.2** Upon completion of the above procedure under **7.3.1**, the Human Resources Director invites the accused person in writing (or by e-mail) to apologize, informing him/her of the means of proof of the accusation, so that he/she proceeds with a counterclaim. The apology is submitted in writing before the Human Resources Director of the Company three (3) days after the notification.

**7.3.3** The Human Resources Director is entitled, at his/her discretion, to ask questions to the accused person or to call (at the same or next day) for additional information / examination the complainant and / or any existing witnesses.

**7.3.4** The Human Resources Director may, upon receipt of the complaint, take as an interim measure, until the issuance of the decision under **7.3.5**, by respecting the principle of proportionality and without prejudice to the prohibition of the abuse of rights, any of the following measures (or a combination thereof) that he/she deems necessary and appropriate to protect the affected person and to safeguard the sense of security at workplace, without this measure prejudging in any way the merits of the complaint. In particular, the Human Resources Director may take interim measures against the accused person:

- Compliance recommendation
- Repositioning
- Change of working schedule/timetable
- Change of place or way of providing the work

**7.3.5** In case, during the completion of the above-mentioned procedure (under **7.3.1** to **7.3.3**), the Human Resources Director of the Company judges (based on the data and testimonies presented before him/her by freely evaluating them) the complaint as well- founded and true, he/she is entitled:

- (i) to decide the enforcement:
  - (a) of any of the sanctions provided by the present Policy of the Company (see below under 10.1.4 – which also constitute- as well as the entirety of the present part of the Company's Rules of Procedure) for the specific violation and
  - (b) any of the above under 7.3.4. measures and / or
- (ii) propose to the Chief Executive Officer of the Company (who is responsible for the respective decision) the termination of the employment contract of the accused person.

The relevant decision of the Human Resources Director (or the termination of the employment contract by the Chief Executive Officer according to the above) will be notified to the complainant and the accused person in writing.

**7.3.6** In case the complaint is directed against the Human Resources Director, all the above under **7.** responsibilities shall be transferred to the Chief Executive Officer. In case the complaint is directed against the Chief Executive Officer, then all the responsibilities under **7.3.3** of the Human Resources Director are transferred to:

- (a) To the Deputy or other Chief Executive Officer, and in case of lack thereof
- (b) to the Chairman of the Board of Directors,  
and in case the capacity of the Chairman and the Chief Executive Officer coincide,  
and there is no Deputy
- (c) to the member of the Board of Directors and legal advisor of the company Mr Stavros-Pantelis Koumentakis.

## **8 Provision of information and cooperation with the competent authorities**

Upon request, the Company through its legal representatives, as well as the Reporting Person cooperate with any competent public, administrative or judicial authority, which, either ex officio or upon request of a person concerned, within the scope of its competence, requests the provision of information and are committed to provide assistance and access to data (no. 5 par. 1 law 4808/2021). For this purpose, any data they collect, in any form, are kept in a relevant file in compliance with the provisions of Law 4624/2019 (A '137).

## **9 Measures to protect employment and support of employees victims of domestic violence**

- 9.1 The Company takes to the extent possible, by any appropriate means or reasonable adjustment, measures to support the employees -victims of domestic violence.
- 9.2 In particular, in the context of employment protection, the Company may, at its discretion, provide to the employee who has been a victim of domestic violence, in order to support him/her in maintaining his/her job and in his/her smooth reintegration after such incidents:
  - a) Special paid leave for a reasonable period of time, (taking into account the non-disruption of the smooth operation of the business)
  - b) Flexible work-related settings (e.g. regarding schedule).
- 9.3 The employee who is a victim of domestic violence requests the above support measures with a special request to the Company, either through the Reporting Person or directly to the Management of the Company. The Company shall manage the issue with discretion and confidentiality.

## **10 Disciplinary Provisions in Case of Violation of the Company's Policy for the Elimination and Fight against Violence and Harassment at Work**

### **10.1 Disciplinary Procedure - Penalties**

- 10.1.1 The existence of a disciplinary procedure and the possibility of imposing disciplinary penalties by the Company in case of violation of the Company's Policy for the Elimination of Violence and Harassment at Work, in no way restricts its right to dismiss the Employee under the conditions provided by the legal framework.
- 10.1.2 Any allegation of violation of the Company's Policy for the Elimination of Violence and Harassment at Work is treated by the Company as a (possibly committed) disciplinary misconduct, in accordance with the provisions of this article.

10.1.3 Responsibility for the imposition of the relevant penalties, provided in this Policy (which will constitute integral part of the Company's Rules of Procedure), has only the Chief Executive Officer of the Company (subject to any otherwise defined above under 7.).

10.1.4 The penalties have as follows:

- (a) oral or written reprimand;
- (b) fine corresponding to a maximum of 25% of one wage or 25% of the paid monthly salary corresponding to one working day.
- (c) unpaid leave, up to ten (10), at most days for each calendar year, in case of recurrence or serious disciplinary violation. In this case the Employee is not entitled to receive the corresponding salary or wage.

10.1.5 A special "file" is kept for each Employee for any violations of the above Policy and any penalties imposed. Reports and complaints shall not be registered, if the Employee is not given the opportunity to state his/her views.

10.1.6 Fines are deposited where and as required by law.

## 10.2 Classification of disciplinary sanctions

The penalties provided for and imposed on the basis of what is provided for in the relevant provisions hereof are always proportionate to the subjective and objective gravity of any breach of the above Policy.

## 10.3 Procedure for imposing penalties and their execution

10.3.1 The imposition of the penalties provided for in this Policy is independent of any other legal consequences and sanction.

10.3.2 The condition for the imposition of a disciplinary penalty is the summoning of the offender to an apology and the notification of any means of proof of the accusation, in order to proceed with a counterclaim. The apology is submitted in writing three (3) days after the notification.

10.3.3 During the -if any- imposed penalty, the Employee has the rights provided to him/her by the current legislation.

10.4 The possible non-strict observance and application of the provisions of this Policy, does not give the right to consider that the Company has waived its rights or that abolition or amendment of this Policy has occurred.

10.5 The penalties, apart from the reprimand, are notified in writing to the interested party, where he/she signs for the receipt the copy or the book of penalties.



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