

General Counsel –
Legal Affairs & Corporate
Governance Division

Human Resources &
Organization
Department

Compliance Department

Human Resources
Management Department
Occupational Health & Safety
Department



Policy against Violence and Harassment at Work

BoD Decision 18 /01.03.2022



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PURPOSE

By the present policy, PPC S.A. aims to prevent and combat any form of violence and harassment while performing work, whether related to or resulting from it.

FIELD OF APPLICATION

This policy shall cover all employees of the Company and in particular the members of the management, employees with a contract of employment (fixed-term and indefinite), those providing services under paid or unpaid mandate contracts, project contracts, independent service contracts and temporary employment contracts, interns, apprentices and volunteers, as well as those employed through third party service providers. It shall also cover employees whose employment relationship has ended and persons applying for a job.

The policy shall be applied :

- (a) at the workplace, including public and private places and places where the employee is engaged in work, receives pay, takes a break, in particular, for rest or eating, in sanitary facilities, locker rooms or accommodation provided by the Company,
- (b) to commuting and business trips, training, as well as work-related events and social activities; and
- (c) during work-related communications, including those carried out through information and communication technologies.



DEFINITIONS

"Violence and harassment" means those forms of conduct, acts, practices or threats thereof, which are intended, lead or are likely to lead to physical, psychological, sexual or financial harm, whether manifested as an isolated incident or repeatedly. The above term includes but is not limited to, forms of conduct whose purpose or effect is to violate human dignity and create an intimidating, hostile or aggressive environment, regardless of whether they constitute a form of discrimination.

"Gender-based harassment" means any form of conduct related to a person's gender that have the purpose or effect of violating human dignity and creating an intimidating, hostile, degrading, humiliating or aggressive environment. The above forms of conduct include sexual harassment, as provided for in Law 3896/2010, as well as forms of conduct related to gender orientation, gender expression, identity or gender characteristics.

"Reprehensible behaviour" related to incidents of violence and harassment means dangerous, immoral or illegal practices that take place in the workplace or in the context of the Company's activities and which include, but are not limited to, mobbing, bullying, threats, extortion, insult, defamation, discrimination based on gender, sexual orientation, colour, age, national origin, religious and/or political beliefs, or family status. Examples of harassment/violence are listed in Annex 1.



ZERO TOLERANCE DECLARATION ON VIOLENCE AND HARASSMENT

PPC S.A. is explicitly and clearly opposed to and takes a stand against any form of violence and harassment that occurs during work, either related to it or resulting from it.

In particular, the Company shall be committed:

- to integrating and generally strengthening preventive and repressive mechanisms and procedures for addressing and eliminating incidents of workplace violence and harassment;
- to receiving, investigating and handling any relevant report/complaint with confidentiality and respect for human dignity, and not placing any kind of obstacles in the receipt, investigation and handling of such complaints, in accordance with the Company's Enforcement Policy & Report/Complaint Management Procedure;
- not to victimising the person who has been harassed or suffers violence, and not to take any action that may be described as 'revenge' or 'retaliation';
- to taking all appropriate measures and make all reasonable adjustments to working conditions in order to support employees who are victims of domestic violence, when such incident comes to the knowledge of the Company;
- to providing assistance and access to any competent public, administrative or judicial authority during the investigation of any incident of violence or harassment.



In addition, employees or any third party related to them in any way shall not be allowed to take retaliatory action against another employee or third party who objects to any kind of violence or harassment, files a complaint, testifies, assists or participates in any incident investigation process.

MEASURES FOR PREVENTING AND COMBATTING INCIDENTS OF VIOLENCE AND HARASSMENT

In order to ensure an accessible, safe and friendly working environment, the Company shall be committed to guide, train and raise awareness among its personnel regarding incidents of workplace violence and harassment, by adopting the following prevention and response measures and mechanisms:

- Providing all managers and employees with information by all appropriate means and training;
- Encouraging employees and any third party related in any way with the Company to report/file a complaint for any incidents of violence and harassment in the workplace that they may witness;
- Identifying fields and specialties where employees are most exposed to incidents of violence and harassment;
- Establishing an internal mechanism to disclose/report and investigate incidents of violence and harassment;
- Designating a contact person (liaison) responsible for guiding and informing employees on the prevention and response to violence and harassment.

For this purpose, the Company has established the Psychological Support Section, coming under the Occupational Health Unit of the Occupational Health & Safety Department, which consists of a network of psychiatrists, psychologists and social workers.



Reports/complaints of incidents of violence and harassment shall be received in accordance with the Company's Enforcement Policy & Report/Complaint Management Procedure and shall be investigated promptly and thoroughly. Following the reporting of an incident or the filing of a complaint by a Company's employee and in order to ensure a healthy work environment, the Company shall take all necessary and appropriate protection measures to ensure that similar incidents or conducts will not be repeated in the future.

These measures may include, but are not limited to, verbal warning, change of job position, working hours, workplace or manner of performing work, disciplinary action, termination of the employment contract of the employee who engaged in violent or harassing behaviour or of the cooperation agreement, as well as legal action.

Any employee who suffers an incident of violence or harassment shall have the right to leave the workplace for a reasonable period of time, without deprivation of salary or other adverse consequence, if in his/her reasonable belief there is an imminent serious risk to his/her life, health or safety, especially when the Head is the perpetrator of such behaviour or when the necessary appropriate measures to eliminate violence and harassment incidents have not been taken. In such a case, the employee concerned shall inform his/her service unit in writing in advance, stating the reasons that justify his/her belief that there is an imminent serious risk to his/her life, health or safety. If the risk does not exist or has ceased to exist and the employee refuses to return to the workplace, the employer may appeal to the Labour Inspectorate to have the dispute resolved.

In any case, the affected persons shall have the right, in addition to taking legal action, to appeal directly to the Hellenic Labour Inspectorate (SEPE) and the Ombudsman, which are the competent bodies for resolving disputes linked to workplace violence and harassment.



CONFIDENTIALITY AND NON-DISCLOSURE

In the process of handling complaints and disclosures of incidents of violence and harassment, the terms of confidentiality and non-disclosure in respect of both the complainant and the respondent shall be strictly observed. Furthermore, with regard to the content of the complaint, as well as any information that could lead to the identification of the person disclosed or directly reported, strict confidentiality shall be maintained.

The way in which the protection of information and access of the person responsible for the investigation of each reported incident of workplace violence and harassment is ensured, shall be mentioned in detail in the Company's Enforcement Policy & Report/Complaint Management Procedure.

FINAL PROVISIONS

The Compliance Department, in cooperation with the competent Departments of the Human Resources & Organisation Division of the Company, shall act as the competent internal body for the Policy, entrusted with competences that include:

- (a) follow-up of the implementation of the policy,
- (b) evaluation of its effectiveness,
- (c) submission of recommendations on measures deemed necessary to improve and strengthen the protection of victims of workplace violence and harassment.
- (d) recommending amendments to the present policy, including its adaptation to any recent provisions of the applicable legislation.

This Anti-Violence and Anti-Harassment Policy shall enter into force upon its approval by the Board of Directors of the Company. The full text shall be permanently available in a conspicuous place on the Company's premises and shall also be posted on the Company's website.



ANNEX 1

EXAMPLES OF HARASSMENT AND VIOLENCE:

- Circulating offensive or obscene material (hard copy or electronic).
- Mocking, obscene, or sexually or racially offensive comments against minority groups.
- Using offensive language, describing or making fun of persons with disability.
- Comments on appearance or character that may cause embarrassment or shame.
- Sending unsolicited messages with sexual or threatening or offensive content via SMS, e-mail, social media, fax, letter, telephone.
- Offensive and intrusive questions about family status, personal life, health, sexual interests or preferences and similar questions about race or nationality, including cultural identity and religion.
- Unwelcome, sexual gestures or persistent propositions for intimate, non-work-related meetings.
- Sexual advances using the threat (direct/indirect) that any refusal will affect career development or recruitment.
- Obscene gestures, touching and any kind of unwanted physical contact.
- Spreading malicious comments or insults (especially due to discrimination on the grounds of age, race, health, gender reassignment, type of marriage, civil partnership, pregnancy and maternity, sex, any kind of disability, sexual preferences, religion or beliefs).
- Verbal or gestural threats, such as yelling or cursing - in public or in private - to personnel or colleagues.



- Belittling or ridiculing a person or his/her abilities, either in person or in the presence of others.
- Outbursts of anger against a person or a group for trivial reasons.
- The systematic misuse of authority (power harassment) against a specific person or persons linked with incidents falling within the scope of this policy.