

A photograph of a modern glass building with a large blue circle overlay in the foreground. The building has a complex, multi-level structure with a glass facade and a white canopy. The sky is clear and blue. The blue circle is positioned in the lower right quadrant of the image, containing the title text.

**POLICY OF
COMPLIANCE OF
VIOLENCE AND
HARASSMENT
AT WORK**

1. PURPOSE AND SCOPE

1.1 PURPOSE

The purpose of this Policy is to define the main axes to be followed by all Company personnel to prevent and combat violence and all forms of harassment, at work and in incidents occurring during the work, or associated with either derived from it.

1.2 IMPLEMENTATION FIELD

The whole Company

2. PERSONS INVOLVED - LIABILITIES

All employees

3. DEFINITIONS - ABBREVIATIONS

Violence and harassment

"Violence and harassment" means the forms of behavior, acts, practices or threats thereof that aim, lead or may lead to physical, psychological, sexual or economic harm, whether they occur individually or repeatedly.

Harassment

"Harassment" means a form of behavior which has as its purpose or effect the violation of the dignity of the person and its personality and the creation of an intimidating, hostile, humiliating, humiliating or aggressive environment, regardless of whether they constitute a form of discrimination, including harassment; due to gender or for other reasons of discrimination.

Sexual harassment

"Sexual harassment" means behavior related to the sex of a person whose purpose or effect is to violate the dignity of that person and to create an intimidating, hostile, humiliating, humiliating or aggressive environment or to disproportionately affect people of a certain sex; and includes sexual harassment.

Psychological harassment

“Psychological harassment” means any persistent, repetitive and / or systematic abusive behavior in the workplace or in relation to work that includes verbal or written threats, acts, gestures, or working methods that, intentionally or unintentionally, are detrimental to personality, dignity or physical or psychological integrity of an individual or causes deterioration of the work environment or endangers the employment of the individual or creates a hostile, intimidating, humiliating or offensive environment. Psychological harassment may be the result of the behavior of one or more individuals.

Domestic violence

“Domestic violence” means all acts of physical, sexual, psychological or economic violence that take place within the family or at home, regardless of biological or legal family ties, or between former or current spouses or partners and regardless of whether the perpetrator is shared or shared in the past the same residence as the victim.

4. REFERENCES

Process of complaints

5. POLICY DEVELOPMENT**5.1 Assessment of risks of violence and harassment at work**

The identification and assessment of risks is carried out in detail in the Company’s occupational risk assessment study, which is systematically monitored by the Security Technician and the Health and Safety System Manager of the Company.

Indicative incidents of violence and harassment at work can be considered as follows:

- Physical or verbal assault or abuse.
- Use of physical or electronic means to threaten or abuse or degrade personality.
- Implied, obscene photographs, obscene gestures designed to degrade the employee’s personality, gender, religion or sexual preferences.
- Dissemination of malicious rumors either individually or in groups about the personality, gender, religion or sexual preferences of an employee.
- Utilization of the position of power within the Company for the degradation of the employee’s personality.
- Utilization of the position of power within the Company for the arbitrary behavior towards the existing e.g. cancellation of participation in trainings, obstruction of promotions and increases.

- Utilization of the position of power within the Company for the proposal to have sexual intercourse.

5.2 Measures to address the risks of violence and harassment at work

More specifically, GEK TERNA in the context of this policy:

- Encourages staff to report and report such incidents in accordance with the complaint procedure.
- Defines the Regulatory Compliance Officer as the reference person for receiving complaints and providing clarifications to staff. Personnel may send their questions or complaints either to the e-mail address compliance@gekterna.com or via the anonymous complaints platform <https://gekterna.integrityline.com/frontpage>.
- Guides and supports victims of violence and harassment or victims of domestic violence for reintegration into the workplace.
- Schedules staff training and awareness raising on violence, harassment and the Code of Ethics and Ethics in general.
- Provides access to all employees in this Policy as well as the relevant Procedures.
- Protects persons who make a complaint and prohibits relative retaliation or mistreatment.
- Monitors through the implemented Management Systems the implementation of measures to prevent violence and harassment at work.

5.3 Personnel information and awareness actions

GEK TERNA is planning training and awareness raising activities for the staff, which it includes in the annual training program of the company. Indicative actions are:

- Informing staff through awareness-raising trainings either live or through e-learning.
- Posting of the Policy and the Available Procedures on an accessible website for all employees.
- Training of specialized training for personnel in positions of responsibility.
- Planning of special on-the-spot training on construction sites and other workplaces outside the Company's headquarters.

5.4 Staff's rights and obligations

Every employee is entitled:

- To be treated with respect and courtesy.
- Not to be subjected to violent behavior, harassment, including sexual and sexual violence, discrimination and intimidation.
- To denounce any incident of prohibited behavior in the workplace (according to this Policy, as analyzed below), without being victimized or suffering any other adverse consequences or retaliation.

Each employee is required:

- To comply with this Policy and all applicable and valid Procedures for the purpose of both his personal protection and those of other employees in the Company.
- To immediately notify any incident of violence and harassment to his / her supervisor.
- To cooperate in case of investigation of a complaint, which may have been submitted in accordance with the following procedure.
- To participate in actions and training programs of the Company regarding incidents of violence and harassment.

In addition, all Company personnel:

- Has the right to judicial protection
- May lodge a complaint with the Labor Inspectorate
- May report to the Ombudsman
- May lodge a complaint with the Regulatory Compliance Officer of the Company, who is obliged to investigate and examine the complaint with impartiality and protection of the confidentiality and personal data of the complainant.

Additional obligations of Managers and supervisors

In particular, the Directors and Heads of the Company owe in addition:

- To ensure the implementation of this Policy in their area of responsibility.
- To establish appropriate standards of conduct in their area of responsibility.
- Not to engage in the manifestation of unwanted and forbidden behaviors in the exercise of their duties.
- To act immediately when they become aware of any manifestation of a prohibited behavior.

- To encourage employees to report any incidents of violence and harassment that they have experienced or perceived.
- To immediately inform the Regulatory Compliance Officer of any incidents of violence and harassment that have occurred in their area of responsibility.

5.5 Domestic violence

The Company shall, as far as possible, take measures to protect employment and support victims of domestic violence.

Any employee who has suffered domestic violence, who also receives extensions in the workplace, may report this orally or in writing to his / her supervisor or to the Head of Regulatory Compliance in order to inform the Company and take the appropriate and necessary measures such as e.g. information and cooperation with the competent authorities.

5.6 Communication with authorities

Greek police

- Call **100** (operates 24/7)
- If you cannot speak, send a text message (sms) to 100, with:
 - ❖ Exact address
 - ❖ Name and surname
 - ❖ Type of emergency (e.g. “my life is in danger”, “I accept violence from my wife/ husband”)

Domestic violence

- For more information, please visit the following website of the Hellenic Police for domestic violence:

http://www.astynomia.gr/index.php?option=ozo_content&perform=view&id=2030&Itemid=421&lang

General Secretariat for Demographic and Family Policy and Gender Equality (GGIF):

- National SOS 15900 telephone line (operated 24/7)
- There is the possibility for women to communicate electronically via the e-mail address:
sos15900@isotita.gr

Single Number of Citizenship Communication and Service for Insurance, Labor and Social Affairs

- <https://1555.gov.gr/>

Useful Websites

- <https://isotita.gr>
- <http://womensos.gr>

6. RECORD KEEPING

As described in the Complaints Procedure.