

POLICY FOR COMBATING VIOLENCE HARASSMENT AND DISCRIMINATION AT WORK

Code
CG.4

Policy Owner

Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination (Elena Gkika)

Version
V.3

Effective
23/04/2023

Approved by

TEMES Managing Director (Evgenios Dendrinou)

POLICY STATEMENT:

The purpose of this Policy is to:

- establish a safe, respectful, and inclusive work environment for all employees.
- prevent and address incidents of violence, harassment, and discrimination in any form, whether verbal, physical, or systemic.
- outline clear guidelines and procedures for reporting and addressing such behavior
- promote a culture of mutual respect, dignity, and equality among all members of the organization. ensure compliance with legal requirements and upholds the Company's values of fairness, diversity, and inclusion.

APPLIES TO:

This Policy applies to all members of the Management of TE.MES. S.A., to all employees of the Company regardless of their contractual status, including those employed under a work contract, freelancers, individuals under paid mandate contracts, individuals through third party service providers, as well as persons in training, including interns and apprentices, volunteers, employees whose contracts have been terminated, job applicants, at the Company's headquarters and at all branches of the Company, as well as to persons related in any way with the Company.

KEY TOPICS:

1. Declaration of zero tolerance of violence, harassment and discrimination incidents:
2. Definitions
3. Scope of application of the policy and responsible bodies
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Related Documents:

- Corporate Code of Conduct
- Employee's Handbook
- Internal circulars/policies for compliance with the Personal Data Protection Rules

1. Declaration of zero tolerance of violence, harassment and discrimination incidents:

"Tourism Enterprises of Messinia S.A." with the present policy commits to the integration and general strengthening of preventive and repressive mechanisms and procedures to address and eliminate incidents of violence, harassment and discrimination at work.

In particular, the Company, aiming at creating a working environment in which respect for human dignity prevails, declares in an explicit and unequivocal manner the prohibition of all forms of violence, harassment and discrimination that occur in the workplace, whether related to or resulting from it, including violence and harassment based on gender, religious beliefs, particular external characteristics, etc., as well as sexual harassment. Human dignity, mental balance, work development and freedom of expression are the rights of each employee, regardless of hierarchical position, gender, age, sexual preference or length of service in the Company.

Furthermore, the Company, recognizing that domestic violence can affect employment, productivity, health and safety in the workplace, takes all appropriate measures within its capabilities and makes all reasonable adjustments to working conditions to protect employment and support employees - victims of domestic violence.

The measures to prevent and combat incidents of violence, harassment and discrimination at work will include, inter alia, facilitating the reporting of such incidents, investigating and handling any complaint or report with confidentiality, discretion and respect for human dignity. In addition, the Company is committed to protect the person who has suffered violence, harassment or discrimination from further victimization and to prevent any action that can be characterized as "retaliation" or "retribution".

Apart from the above commitments, the Company also expressly declares that it will assist any public administrative or judicial authority in the investigation of an incident of violence and harassment in the latter.

Finally, this policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the regulatory legislation implementing them and includes the persons referred to in para. 1 of article 3 of Law 4808/2021.

2. Definitions

2.1. **“Company”** means the company under the registered name “Tourism Enterprises of Messinia S.A.” (“T.E.MES. SA”).

2.2. **“Violence and Harassment”** mean the unacceptable forms of behavior, actions, practices or threats that aim at, result in or may result in physical, psychological, sexual or financial damage, either occurring in isolation or repeatedly. The abovementioned term indicatively includes forms of behavior that aim at or result in the violation of human dignity and the creation of a fearful, hostile or aggressive environment, regardless of whether they constitute a form of discrimination.

Indicatively:

- ✓ aggressive or threatening behavior, such as shouting, gestures, pushing,
- ✓ spreading, in writing or orally, malicious and unsubstantiated rumours about a person or group, socially excluding or isolating someone,
- ✓ use of offensive humour, including racist, educational, religious, sexist or ethnic jokes,
- ✓ derogatory remarks concerning the gender, race, ethnicity, national origin, age, disability, educational level, religion, sexual orientation, gender identity or expression, or any other legally protected characteristic of another person,
- ✓ publicly ridicule another person,
- ✓ derogatory comments concerning physically specific characteristics of a person such as weight, height, etc.,
- ✓ receiving, posting, displaying, publishing, photographing, printing, distributing pornographic, obscene, offensive or inappropriate materials or materials of an ethnic, religious or racist nature,
- ✓ destruction, concealment or theft of personal items or work equipment,
- ✓ visual forms of harassment, e.g. posters, cartoons, caricatures, photographs or drawings that are derogatory on the basis of characteristics protected by law,
- ✓ retaliation or intimidation for reporting or threatening to report any of the aforementioned forms of harassment or for cooperating in the investigation of a harassment incident.

2.3. **“Gender-based harassment”** means the forms of behavior that are correlated to the gender of the person, that aim at or result in the infringement of the right to the personality and the creation of a fearful, aggressive, humiliating, degrading and/or hostile environment. The abovementioned forms of

behavior also include sexual harassment, as defined in the provisions of Law 3896/2010, as well as forms of behavior related to the sexual orientation, the expression, the identity or the characteristics of a person's gender.

Indicatively:

- ✓ derogatory comments or jokes about gender, gender identity or gender expression or sexual orientation,
- ✓ aggressive behavior on the basis of gender, gender identity, gender expression or sexual orientation.

2.4. **"Sexual Harassment"** is defined as the manifestation of any form of unwanted verbal, psychological or physical conduct of a sexual nature, which results in the violation of an individual's personality, in particular by creating an intimidating, hostile, degrading, humiliating or aggressive environment around that person.

Indicatively:

- ✓ explicit sexual proposals, requests for sexual concessions or unwanted demands for dates,
- ✓ offering benefits (e.g. promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sexual intercourse" as a means of professional development in the workplace,
- ✓ sending sexual/pornographic images, photographs, texts or messages by e-mail or any other means of communication (messenger, what's app, etc.),
- ✓ sexual innuendos, comments, epithets, obscene or defamatory expressions with sexual innuendos, "teasing" or "jokes" of a sexual nature,
- ✓ obscene gestures, display of sexually offensive graphic material in electronic and printed form (e-mail, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual innuendo,
- ✓ inappropriate or derogatory comments about a person's appearance or clothing,
- ✓ unwanted physical contact, such as touching, gestures of a sexual nature,
- ✓ retaliation or threats of retaliation after rejection of sexual advances.

2.5. **"Direct discrimination"** means any act or omission which excludes or places persons at a distinct disadvantage because of their sex, age, origin, sexual orientation, gender identity, religious beliefs,

as well as any instruction, incitement or systematic encouragement of persons to discriminate unfavorably or unequally against others on the basis of their sex, age, origin, sexual orientation, gender identity, religious beliefs, whereas **"indirect discrimination"** shall mean any act or omission which puts persons at a particular disadvantage because of their sex, age, origin, sexual orientation, gender identity, religious beliefs, unless that criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

Indicatively:

- ✓ preventing a person's advancement on the grounds of age, sex, origin, religion, political beliefs,
- ✓ denying a person access to privileges and facilities to all staff on the grounds of gender, age, sexual orientation, gender identity, religious beliefs.

2.6. **"Improper Behaviors"** related to violence and harassment incidents are the dangerous unethical or illegal practices occurring at the workplace under the responsibility of the employer or in the context of the Company's activities.

2.7. **"Unwanted Behavior"** means any behavior that is unpleasant and offensive to a person, regardless of whether it is an isolated or repeated action.

2.8. **"Retaliation"** are the unjustified unfavorable measures that the Company may take against either the insulted person or the employees that defended, formally or informally, or testified in its favor or against the person accused prior to the investigation of the report and/or complaint against him/her.

Indicatively:

- ✓ suspension or dismissal,
- ✓ failure to convert a temporary employment contract into a full-time contract,
- ✓ non-renewal or early termination of an employment contract,
- ✓ unjustified low performance appraisal,
- ✓ exclusion from promotion opportunities or demotion,
- ✓ denial of opportunities and training,
- ✓ exclusion from corporate social opportunities

- ✓ and, in general, any actions that result in an excessive limitation or extension of the duties of the person making the complaint or the person reporting or disclosing incidents of violence, harassment and discrimination.

2.9. “Responsible Authority” are the individuals, teams and/or departments of the Company that are responsible for handling the reports and/or complaints regarding violence or harassment incidents at the workplace and taking preventive and battling measures for such incidents. For the purposes of this Policy, the Human Resources Department of the Company is considered as the responsible authority.

3. Scope of application of the policy and responsible bodies

- 3.1. This policy applies in the workplace, including public and private places where the employee performs work - whether physically present or at a distance -, takes breaks, in particular for rest or meals, in personal hygiene and care facilities, changing rooms or accommodation provided by the employer, commuting to and from work, other types of commuting, travels, training, and work-related events and social activities as well as during work-related communications, including those enabled by information and communication technologies.
- 3.2. For the Company, this policy applies to the Company's headquarters in Athens and its branches (e.g. the Costa Navarino hotels and facilities), to the workplaces where subsidiaries are housed, to construction sites and houses under construction and residences of the Company, during transportation to and from the Company, during the conduct of corporate meetings, gatherings, conferences and in general, to all communication and interaction between employees, employees and partners, employees and the Company, etc. e.g. during work breaks, in social media and when exchanging personal messages (sms, email, skype, etc.).
- 3.3. The competent bodies for monitoring and implementing the Policy on combating violence and harassment at work are:
- the Management,
 - the Directorate of Human Resources,
 - the Heads of Departments (when appropriate).

4. Purpose and core principles of the Policy

- 4.1 This Policy sets out the principles and framework for the company's compliance with the provisions of Convention 190 of the International Labor Organization on the Elimination of violence and harassment in the world of work, ratified by Articles 1 to 23 of Law 4808/2021.
- 4.2 Through this Policy, the Company sets as a top priority the development of a culture of free expression at work, encouraging immediate reaction and reporting of any improper behavior related to violence, harassment and discrimination in the workplace.
- 4.3 For this purpose the Company commits to:
- 4.1.1. Provide immediate protection to an Employee who believes that he/she is or has been subjected to violence or harassment or discrimination by protecting him/her from possible retaliation against him/her for repelling the violence or harassment or discrimination or for making a complaint of violence, harassment or discrimination.
 - 4.1.2. Ensure that all Employees are protected from further victimization, adverse treatment and detrimental change of circumstances as a result of their contribution in any way (e.g. whistleblowing, testimony) to the investigation of a report of an incident of violence or harassment.
 - 4.1.3. Ensure that the victim is informed of his/her right to take legal action or to appeal to the Labour Inspectorate and the Ombudsman and, if required, to provide any relevant information to the Responsible Authorities.
 - 4.1.4. Prohibit retaliation and any form of vindictive behavior.
 - 4.1.5. Have effective means of monitoring and investigating reports and/or complaints of incidents of violence and harassment, as detailed in Chapter 4 herein.
 - 4.1.6. Cooperate and assist any Responsible Authority in investigating incidents of violence, harassment or discrimination at work in order to maintain a healthy and safe working environment, which is governed by the principles of mutual respect, honesty, courtesy, understanding and mutual support.

5. Measures and mechanisms for preventing, handling and combating incidents of violence, harassment and discrimination at work

5.1 The Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination

Any employee who wishes to make a report or complaint about an incident of violence, harassment or discrimination that he/she has been subjected to or of which he/she has direct or indirect knowledge may contact the Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination, Ms. **Elena Gkika** or alternatively the Internal Audit Director, Ms. **Venetia Kontoe** (for contact details see below: paragraph 5.4.1).

5.2 Committee for the Evaluation of Reports of Violence, Harassment and Discrimination

5.2.1 The Violence and Harassment Report Evaluation Committee (Committee) evaluates the named and/or anonymous complaints/reports received by the Reporting Officer/Complaints Manager for Violence and Harassment or the Internal Audit Director.

5.2.2 The Company encourages eponymous complaints. Anonymous complaints make the task of a thorough investigation extremely difficult or impossible due to the difficulty of providing information from an anonymous complainant (e.g., conversation, meeting to provide clarification during the investigation) as well as assessing the credibility of the complaint.

However, even anonymous complaints will be taken into consideration seriously and investigated. In particular, anonymous complaints will be examined based on their degree of substantiation and the possibility of identifying the action incompatible with this Policy that they describe.

5.2.3 In any case, the Company commits to maintain the anonymity of the complainant and not to take any action that may result in the disclosure of his/her identity. It is noted that the disclosure of the identity of the complainant may be required by judicial or legal proceedings in the context of the investigation of the case. The anonymity of any other persons involved in the report will be preserved, subject to the above restrictions.

5.2.4 The preserving and processing of personal data is carried out in accordance with the provisions of the applicable legislation on the protection of personal data.

5.2.5 The Evaluation Committee consists of three members:

- (a) The Reporting Officer/ Complaints Manager for Violence and Harassment,
- (b) The CEO of the Company,

(c) The Director of Internal Audit.

5.2.6 In case a member of the Committee is unable to participate or even in case of conflict of interest or in case the report/complaint concerns a member of the Committee, the member will be replaced by an external associate/consultant specialized in the specific area.

5.3 Measure for prevention and protection

5.3.1 The Company, both during the recruitment of personnel and throughout the period of their employment, undertakes to continue to develop training programs aimed at informing, raising awareness and generally combating and reducing incidents of violence, harassment and discrimination.

5.3.2 More specifically, the Company:

(a) at regular intervals - starting from the time of recruitment - will offer its employees training and education programs, which are part of the Company's trainings ("mandatory trainings"), as well as ad hoc training, on the protection provided to them by the applicable legislation against behaviors that may constitute harassment or sexual harassment or discrimination in the workplace, on their rights and obligations in such cases, and on the actions to be taken if they consider themselves to be victims of violence or harassment or discrimination in the workplace,

(b) encourages its Employees to cooperate with the Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination, to contribute to its activities and to report their views on programs and measures to prevent and suppress violence and harassment, as well as their performance in relation to the working environment,

(c) commits to educate and sensitize its personnel with regard to incidents of violence and harassment, so that its employees are able to recognize such incidents that may occur at work, to apply methods of dealing with conflicts in the workplace, using techniques to de-escalate a crisis or tense or violent situation, to report incidents of violence, harassment, intimidation and discrimination in the workplace and to support the person who is subjected to such behaviors.

(d) educate its personnel through periodical campaigns regarding the importance of:

- the principle of equal treatment,
- the prohibition of discrimination,
- respecting diversity,
- promoting a culture of honesty, dialogue and prevention, combating and suppressing violence and harassment at work.

(e) promote measures to identify the sectors and/or specializations where employees are most exposed to incidents of violence, harassment and discrimination and, in cooperation with employees' representatives, take the necessary steps to foster in its staff a sense of security so that they are not afraid to disclose incidents of violence and harassment of which they or their colleagues are victims.

5.4 Internal mechanisms for handling reports/complaints of violence, harassment and discrimination incidents

5.4.1 Procedure for recording a report and/or complaint

Any person falling within the scope of this policy may report and/or denounce an incident of violence, harassment and discrimination that he/she has become aware of, either named or anonymous, using one of the following channels/ways of communication:

- Verbally and in person to the Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination, or alternatively the Internal Audit Director
- By telephone (by verbal communication or message) to **6980 325000** (this number is managed by the Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination), or alternatively to **6941661027** (number that is managed by the Internal Audit Director)
- At the dedicated e-mail address (harassment@temes.gr), (which is active from 1/1/2022.)
- By letter to the mailbox of the Human Resources Department addressed to the Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination.
- By letter addressed to the Internal Audit Director: 5 Pentelis Str. P. Faliro Attica 17564 Greece

5.4.2 Internal procedure for investigating a report or complaint

5.4.2.1 Complaints and reports of incidents of violence, harassment and discrimination will be accepted, named or anonymously, and will be investigated promptly and thoroughly. Upon the reporting of an incident or complaint by an Employee of the Company and to ensure a healthy work environment, the Company may make internal transfers of the parties involved or their departments, modify working hours or even suspend temporarily the parties involved during the investigation of the incident and for up to one week.

- 5.4.2.2 The complaint is recorded and the Head of Human Resources as the Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination or alternatively the Internal Audit Director, convenes the Violence and Harassment Complaints Evaluation Committee within five (5) working days.
- 5.4.2.3 The investigation of each complaint is conducted objectively, ensuring that all persons involved are heard impartially and treated fairly. During the investigation, relevant testimonies shall be recorded and minutes shall be kept according to the General Data Protection Regulation.
- 5.4.2.4 It is provided that as part of the procedure and, where necessary, the possibility of obtaining the opinion of an expert, external specialist consultant.
- 5.4.2.5 Complaints and reports of incidents of violence, harassment and discrimination at work are made in terms of confidentiality, privacy and protection from retaliation against both the complainant and the person accused.
- 5.4.2.6 The Reporting Officer/Complaints Manager for Violence, Harassment and Discrimination who is responsible for monitoring and recording incidents of violence, harassment and discrimination at work, has the following obligations and responsibilities in relation to this policy:
- (a) monitoring the implementation of the policy, evaluating the effectiveness of the policy and making recommendations for updates and improvements to the policy in accordance with the risk assessment reports, the extent of internal reports and allegations of incidents of violence and harassment, as well as any suggestions from Company's employees,
 - (b) making recommendations to any official authority on measures it considers necessary to improve and strengthen the protection of victims of violence, harassment and discrimination in the workplace,
 - (c) promoting measures for the protection of the victim(s), as well as the imposition of sanctions.
- 5.4.2.7 In addition to the option of notifying an incident of violence, harassment or discrimination through the above internal procedure for the disclosure of such incidents, the affected persons have the option of recourse to external official mechanisms and bodies that deal with the resolution of disputes arising from violence, harassment and discrimination at work, including the Labour Inspectorate (SEPE), the Ombudsman and the Civil and Criminal Courts.
- 5.4.2.8 It is noted that in the event that the insulted person directly appeals either to the Labor Inspectorate, the Ombudsman or the Civil and Criminal Courts, the internal investigation procedure described above is immediately activated as soon as the Company becomes aware of it, and the Company is at the disposal of the Responsible Authorities in order to assist in the investigation of the incident.

6. Confidentiality and Privacy

During the procedure for reporting and disclosing incidents of violence, harassment and discrimination in the workplace must strictly respect the conditions of confidentiality and privacy of both the complainant and the person accused. Furthermore, with regard to the content of the report, as well as to any information that could lead to the identification of the person disclosed or directly complained about, strict privacy should be maintained.

7. Violence and harassment in the workplace risk assessment report

- 1.1 Potential risks of violence and harassment in the workplace should be identified in an integrated manner, by assessing the risk or potential risk of violence and harassment and developing a relevant prevention strategy to mitigate the actual or potential risks arising from employment conditions, from third parties, as well as from the abuse of power in the workplace.

The above assessment should, inter alia:

- (a) take into account the way the Company reacts and responds to complaints,
 - (b) identifying and documenting the location and circumstances in which incidents of violence, harassment and discrimination typically occur in consultation with employees (e.g., isolated work areas, busy workplaces, alone working, parking lot security, transportation from work to home and vice versa).
- 1.2 The relevant risk assessment report on the risks of violence and harassment at work is prepared and updated periodically by the Company's Technical Safety Manager, whereby employees are informed of the risks arising from work, including the risks of violence, harassment and discrimination, as well as ways to prevent them.

8. Provision of penalties

- 8.1 Depending on the gravity of the complained incident and the circumstances under which it took place, the Company is obliged to take the necessary appropriate protective measures and sanctions against the person accused in order to prevent and avoid a similar incident or conduct from reoccurring in the future.

- 8.2 These penalties may be indicatively and not restrictively:

- (a) a simple reprimand (verbal reprimand),

(b) a written reprimand,

(c) a severe written reprimand and a recommendation to comply,

(d) temporary suspension of up to 5 working days from the Company.

8.3. The Company may also consider as appropriate measures the change of working hours or the place of employment, while if the milder measures are deemed inappropriate, it may even terminate the employment contract of the employee who has engaged in violent or harassing behavior.

8.4. It should be noted that the recurrence of the person accused constitutes a particularly aggravating circumstance, which is taken into account when calculating the penalty to be imposed.

9. Measure for employees-victims of domestic violence

The Company is committed to assist any employee who has suffered domestic violence by supporting him/her in every reasonable way and by any appropriate means, including but not limited to:

(a) the possibility of applying flexible forms of work (e.g. working hours, teleworking where this is feasible due to the nature of the work provided),

(b) strengthening safety measures in the workplace, and

(c) providing psychological support through the reference to a specialized psychologist.

10. Final provisions

The present policy against violence and harassment enters into force and shall be amended in accordance with the applicable legal provisions. The full text can be permanently found in an accessible and visible place in the Company's premises, while at the same time it is also posted on the online training platform. Any employee may, upon request, receive a hard copy of the Policy.