



POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT AT WORK

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**POLICY TO PREVENT AND COMBAT
VIOLENCE AND HARASSMENT AT WORK**

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POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT AT WORK

1. PURPOSE

EYDAP S.A.(hereinafter referred to as the "Company") adopts this Policy in accordance with the articles 9 and 10 of Law 4808/2021 (Government Gazette 101/A/19-6-2021) and the regulatory legislation implementing them after relevant consultation with the EYDAP OME.

The Company is committed to operating in accordance with the principles of business integrity and the current legislative and regulatory framework for the protection of labour, seeking to maintain high standards of professional and ethical conduct.

The purpose of this Policy is to create and establish a violence and harassment-free work environment that promotes and respects human dignity and protects the rights of every person from abusive and violent behaviour.

The Company declares that, as part of its duty of care, it recognizes and respects the right of employees to a healthy and safe working environment, free of violence and harassment, and that it will not tolerate any such behavior, in any form, by any person. In this context, incidents of any form of violence and harassment in the workplace are expressly prohibited and the Company undertakes to make every effort to address and eliminate them immediately. Therefore, any form of violence, abusive behaviour, psychological or physical abuse, intimidation, harassment, harassment, or any other form of harassment will not be tolerated by the Company.

2. SCOPE OF THE POLICY

The “Company” adopts the Policy in all its activities to prevent and address all forms of violence and harassment including gender-based violence and harassment and sexual harassment that occurs in the course of work, whether related to or arising from work.

The persons covered by the protection are workers and employees at EYDAP and its subsidiary, regardless of their contractual status, including those employed under a contract of employment, independent services, on a paid basis, those employed through third party service providers, as well as persons undergoing training, including trainees and apprentices, volunteers, as well as workers whose employment relationship has ended, and persons applying for employment.

This present Policy applies to incidents of violence and harassment, including gender-based violence and harassment and sexual harassment, which are caused in the course of work, whether related to or arising from work and occur: a) in the Company's workplaces and in any other place where employees are present in the course of their work, b) during their travel to and from the workplace, other travel, as well as at events and social activities related to work (corporate events, seminars, business trips etc) and c) in work-related communications, including those carried out by means of information and communication technologies (email, sms, etc)

3. DEFINITIONS / EXAMPLES

"Violence and harassment" means those forms of conduct, acts, practices or threats thereof, which are intended to cause, result in or are likely to result in physical, psychological, economic or sexual harm, whether occurring in isolation or repeatedly.

"Workplace Violence" is any incident of abuse, threat or assault on a person in the workplace during the performance of work duties. Indicatively, it may include physical assault, aggressive behaviour, threats, verbal abuse, incidents involving anger, insulting, undue reinforcement of psychosocial risks. These are behaviours that constitute physical and psychological abuse, that cause physical or mental pain, diminish the personality, dignity and integrity of the employee.

"Harassment" means any form of conduct that has the purpose or effect of violating the dignity of a person and of creating an intimidating, degrading, humiliating, hostile, degrading or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment on the grounds of sex or other grounds of discrimination.

"Gender-based harassment" means forms of conduct related to the gender of a person which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of conduct include sexual harassment, as well as forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics.

"Sexual harassment" is defined as any form of unwanted verbal, psychological, or physical conduct of a sexual nature that results in the violation of a person's personality, in particular by creating an intimidating, hostile, degrading, humiliating environment around that person. These are behaviours with a sexual tone or innuendo, manifested in actions or words, which are unpleasant and offensive to a person. They do not have to be repeated behaviours, a single isolated incident is enough.

A **"Reference Person" ("Liaison")** is defined as the person designated as responsible for guiding and informing employees on the prevention and response to violence and harassment at work.

Examples of violence and harassment: indicative but not restrictive are the following the following forms of undesirable conduct which have the purpose or effect of violating the personality by creating an intimidating, hostile, degrading or aggressive working environment for the person subject to them:

- Unjustified systematic exclusion from processes and activities in the work environment (e.g. systematic exclusion of a person from work group meetings)
- Unjustifiable removal of significant areas of responsibility and replacement with minor duties, not consistent with the employee's annual (positive) evaluation
- Repeated criticism and belittling of the work, the individual or his/her abilities either in person or in the presence of others
- Frequent outbursts of anger, insults or threats against a person or group,

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- Exploiting a position of authority that provides a hierarchically superior position for one's own sexual benefit
- Immoral or offensive comments,
- Obscene gestures, touching and any kind of unwanted physical contact,
- Exposure of body parts for the purpose of sexual arousal,
- Sexual comments or innuendos,
- Unsolicited proposals aimed at sexual intercourse, unwanted intimacy,
- Describing sexual activity in front of other people without their consent
- Indiscriminate questions about personal or sex life,
- Persistent proposals for social activity or private meetings that are not work-related
- Displaying offensive or obscene material (e.g. pictures, objects, etc.) ,
- Unsolicited messages with sexual or threatening or offensive content via information and communication technologies
- Humiliating, malicious or racist comments directed against minority and/or vulnerable groups.
- Comments about someone's appearance or character that cause embarrassment or shame.
- Offensive comments and unjustified questions about someone's marital status, race or ethnicity, including their cultural identity and religion.
- Retaliation or intimidation in case of reporting or threatening to report any harassing behaviour.

Behaviors of violence and harassment do not include those that are within the limits of the managerial right under the provisions of labour law and concern the normal supervision and control of employees, the objective evaluation of their work performance and their general work presence (e.g. the provision of recommendations or comments by the hierarchically superior employee regarding the way his/her subordinate performs his/her tasks)

Whether an action/behaviour is considered violence or harassment is an objective fact and is not influenced by the intentions of the perpetrator, as, good intentions do not invalidate conduct that constitutes harassment if the conduct is unwanted and unacceptable to the person subjected to it.

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4. MEASURES TO PREVENT AND RESPOND TO INCIDENTS OF VIOLENCE AND HARASSMENT - INFORMATION & AWARENESS ACTIONS

The Company complies with all measures and obligations set out in Law 4808/2021 for the prevention and response to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment. In this context, the Company shall ensure the awareness and protection of employees and the strengthening of trust in the working environment, take all appropriate measures, implement practices and procedures in order to inform employees of this Policy, their rights and the procedures to be taken to deal with incidents of violence and harassment and the management of reports/complaints of the aforementioned incidents.

Through this Policy, the Company aims to make employees vigilant in order to understand and recognize violence and harassment behaviors in a timely manner, and to encourage them to report them to its authorized representatives, as identified in par. 5.

4.1. Measures to prevent, control, contain and respond to risks of violence and harassment - monitoring of such incidents or forms of behaviour

Measures and administrative practices to prevent and control the risks of violence and harassment include:

- Encourage the maintenance of a working climate where respect for human dignity, cooperation and mutual assistance are core values.
- Open communication with the Company (i.g. an anonymous questionnaire to be completed by employees regarding issues of violence and harassment at work) and immediate supervisors and colleagues.
- Adoption of a procedure for the management of reports/complaints by the Complaints Evaluation Committee on violence and harassment at work.
- Technical measures, such as improved lighting, etc.
- Posting of this Policy on the Company's website.
- Ensuring that employees have the necessary training/information to carry out their duties, particularly in jobs that are at higher risk of violence and harassment incidents.
- Actions to raise awareness among employees of healthy behavioural patterns (e.g. avoiding addictions), but also on issues concerning vulnerable categories of employees.
- Guidance and support for victims of violence and harassment or victims of domestic violence to reintegrate into the workplace.
- Training of employees in the procedures for the management of violent incidents, under the responsibility of the Executive Division of Human Resources / Obligatory training of senior managers on the above issues
- Monitoring of incidents of violence and harassment, on an annual basis by the Executive Division of Human Resources and the Regulatory Compliance Division (in cooperation with the HRD) / Evaluate on a regular basis the effectiveness of the preventive and mitigation measures in place and review/update the assessment of risks and measures.

4.2. Assessment of the risks of violence and harassment at work

The Company, in the context of its obligations under Law 3850 /2010 ("Code of Laws on Health and Safety at Work") regarding the assessment of professional risks, identifies and evaluates risks related to violence and harassment, taking into account, inter alia, any inherent risk arising from the nature of activities, jobs, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks related to specific groups of employees, such as night workers, new recruits, people with disabilities and people with fixed-term contracts.

The assessment of the risks of violence and harassment is carried out in accordance with the Company's approved Risk Management Policy. In addition, for risk assessment, the Company may use the job risk assessment prepared by the ESYPP as well as digital tools through the online platform OIRA (Online Interactive Risk Assessment) on the website <http://www.oiraprojet.eu> of the European Agency for Safety and Health at Work (EU-OSHA).

In this context, working conditions are assessed and appropriate improvement measures are proposed in order to ensure the protection and safety of workers. The risks associated with violence and harassment at work are considered to be very significant both for the employees (causing stress, anger, fear during work and psychosomatic symptoms) and for the Company (disruption of working relationships and the smooth functioning of the Company, reduced productivity, negative reputation, legal and financial consequences).

The Company takes appropriate measures to ensure that employees receive all necessary information regarding the risks and measures to address violence and harassment at work. At the same time, the responsible Occupational Physician shall inform employees about the risks of violence and harassment at work and ways to prevent them.

4.3. Staff information and awareness activities

The Company undertakes to provide to staff and employees who are subject to the scope of this Policy with information in accessible formats, as appropriate, on the risks of violence and harassment, the related prevention and protection measures, as well as the possibilities provided by law in the event of such incidents, under the auspices of the Company's Executive Division of Human Resources.

In particular, the Company's Executive Division of Human Resources trains employees to recognise discrimination, violence and harassment at work and to provide the necessary support to its staff and associates.

In addition, it encourages the participation of employee representatives and management in training programmes and seminars on the recognition and management of risks of violence and harassment at work.

The Company encourages its employees and any third party associated with it (such as customers, suppliers, contractors) to report incidents of discrimination, violence and harassment in the workplace that come to their attention.

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The heads of the organisational units, regardless of their status, must, within the framework of the provisions of the Code of Ethics and Professional Conduct of the Company, report any incident of violence or harassment that comes to their attention, informing the "Liaison" immediately by any appropriate means, in order to apply the procedure of paragraph 1. 5.

4.4. INFORMATION ON THE RIGHTS AND OBLIGATIONS OF EMPLOYEES AND THE COMPANY

In the event that a person is affected by an incident of violence and harassment upon access to employment, during employment, or even if the contract or employment relationship under which the incident or conduct allegedly occurred has ended, the person has the right to (a) judicial protection; (b) an action, a complaint and a request for an employment dispute to the Labor Inspectorate, within the scope of its authority under the law; (c) a report to the Ombudsman, within the scope of its authority under the law; and (d) a complaint within the Company, in accordance with the procedure under para. 5 of this Policy. In any case, where a report or complaint of such conduct within the Company arises, the aggrieved person reserves all rights to appeal to any Competent Authority.

Any person who is subjected to an incident of violence and harassment must inform the "Liaison" in writing beforehand, stating the incident of violence and harassment and the circumstances that justify his or her belief that there is a serious risk to his or her life, health or safety. Thereafter, the "Liaison" shall forward the complaint to the Violence and Harassment Complaint Review Committee and the Committee, after investigation and evaluation, shall determine what the appropriate action is to address the alleged incident in accordance with the procedure outlined or provided for in para. 5 of this Policy.

The affected worker has the right to leave the workplace for a reasonable period of time, without loss of pay or other adverse consequences, if in his/her reasonable belief there is a serious risk to his/her life, health or safety, in particular, where his immediate superior or other superior is the perpetrator of such behaviour, or where he fails to take the necessary appropriate measures to restore industrial peace, or where such measures are not sufficient to stop the behaviour of violence and harassment.

In this case, if the risk does not exist or has ceased to exist and the person who suffers an incident of violence and harassment against him or her refuses to return to the workplace, the Company may appeal to the Labour Inspectorate with a request to resolve the dispute.

When an employee who is a member of the regular staff or otherwise employed in an employment relationship violates the prohibition of violence and harassment of this Policy, the Company shall take the necessary appropriate measures on a case-by-case basis against the complainant, in order to prevent and prevent a similar incident or behaviour from recurring. Such measures may include recommending compliance, changing the job, hours, place or manner of employment, or terminating the employment or partnership relationship, subject to the prohibition of abuse of right in Article 281 of the CC.

In any case, the violation of the prohibition of violence and harassment at work gives rise, among other things, to a claim for full compensation for the person affected, which covers his/her positive and consequential loss and moral damage.

The Company's Executive Division of Human Resources ensures that the information provided to employees is complete and that the details of the competent Administrative Authorities to which any affected person has the right to appeal (Labour Inspectorate) are posted in conspicuous places (notice boards of all organisational units, intranet (Thalassa)), Citizen's Advocate), and in particular informs the affected persons of their right to contact the SEPE complaints hotline through the 1555 citizens' helpline,

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as well as the direct psychological support and counselling service for women victims of gender violence, through the SOS 15900 hotline.

4.5. Protection of employment and support for workers victims of domestic violence

The Company takes measures that actively demonstrate its social responsibility towards the phenomenon of domestic violence, such as protecting employment, providing special leave or flexible working arrangements at the request of the employee victim of domestic violence, in order to support him/her in maintaining employment and smooth reintegration after such incidents, especially in cases where there are minor children or children with disabilities or serious illnesses.

4.6. DEFINITION OF REPORTING PERSON ("LIAISON")

- a) **The Company's Reporting Person ("Liaison")** is defined as, the person who is responsible for guiding and informing employees to prevent and respond to specific incidents of violence and harassment at work regardless of whether they are addressed to him/her in response to an incident of violence. The role of the "Liaison" is mainly informative. Where his/her assistance is requested, he/she may support the drafting/submission of complaints. The 'Reporting Person' shall inform the person concerned of the details of the competent administrative authorities to which he or she has the right to appeal at any stage of the procedure provided for in par. 5 of this Article as well as the contact details of the Authorities. The Association shall ensure that the affected persons are informed about their right to seek psychological support from the Company's medical doctor of a relevant specialty.

In addition, the "Liaison" receives the complaints about incidents of violence and harassment at work and forwards them to the Complaints Evaluation Committee for investigation and management, in accordance with the procedure for receiving and examining complaints as provided for in par. 5 of this Policy. The Reporting Person shall be obliged to protect any Personal Data (PD) which may come to his/her knowledge in the course of his/her duties.

In the context of the effective implementation of this Policy, two "Reporting Persons" appoints as "Reference Persons" two executives from the Executive Division of Human Resources, proposed by the Head of Human Resources.

The name and contact details are posted in prominent places (notice boards of all organizational units, intranet (Thalassa) for the information of employees by the Company's Executive Division of Human Resources.

- b) A **Committee for the Evaluation of Complaints of Violence and Harassment at Work** shall be established, which shall investigate and evaluate complaints of incidents of violence and harassment at work and decide what is the appropriate measure to address the reported incident, in accordance with the procedure set out in par. 5 of this Policy. The work of the Committee may be assisted, where appropriate, by the Company's employed medical doctor of relevant specialty.

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The Committee for the Evaluation of Complaints of Violence and Harassment at Work consists of:

1. The Executive Director of Human Resources
2. The Regulatory Compliance Director
3. The Personnel Issue Department Head
4. the General Director/Director of an independent organisational unit in which the incident takes place. If the incident involves more than one organisational unit, then the General Directors/Independent Directors of the organisational units involved in the incident will be involved
5. The President of the Federation of Workers
6. The Company's medical doctor proposed by ESYPP

The above are substituted in case of any impediment to their participation in the Committee (e.g. when the complaint concerns a Member of the above Committee, either as a perpetrator or as a victim, where there is a conflict of interest). The full and alternate members of the Complaints Evaluation Committee and the way of their replacement are defined by decision of the CEO.

The Commission meets in a valid manner when all its members (members or alternates) are present and its decisions are taken by majority vote. In the event of a tie, the President of the Commission shall have the casting vote.

The Commission shall report annually to the Governing Board on the submission and management of complaints of violence or harassment at work.

5. PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS

5.1. Complaints reception

Any person who suffers an incident of violence and harassment against him/her has the right, to contact the "Liaison" in order to be informed of his/her rights, as well as to be informed of the procedure provided by this Policy and under the applicable legislation, to deal with the incident of violence and harassment suffered.

Any employee who is subjected to any form of violence or harassment during work, whether related to or arising from work, has the right to submit a written complaint/report through the channels of communication referred to in par. 7 of this Policy. Complaints about incidents of violence and harassment are to be made by name and must be clear and specific and include the full details of the complainant and the complainant, contact details, as well as a clear reference to the specific incidents that constitute the complaint, with a certain description of the incident (e.g. e.g. date, place, description of the act or conduct and any other information deemed by the complainant to be of assistance in investigating the incident).

Complaints/reports shall be submitted to the "Liaisons" in writing either by mail or to the e-mail address posted by the Executive Division of Human Resources in the designated communication channels for this purpose or in person. Complaints/reports are then forwarded directly to the Violence and Harassment Complaints Evaluation Committee for investigation, evaluation and management.

The "Liaisons" must receive and not prevent the submission of complaints. Persons submitting a report/complaint shall be informed by the "Association" of its receipt and of the progress of its examination by the competent Commission.

5.2. Investigation and examination of complaints

After the incident is reported by "Liaison" the Violence and Harassment Complaints Evaluation Committee, as part of its responsibilities for investigating and managing complaints:

- Takes all necessary measures to ensure the protection of those affected, the confidentiality of the procedure and the confidentiality of information and data, acting with impartiality and respect for human dignity and the rights of employees (complainants and complainants),
- Investigates the credibility of the complaint based on the facts described in the complaint and collect facts and information to determine the validity of the complaint of the alleged incident. In this context, the Commission has the right to: a) communicate with the complainant and the complainant, b) contact the organisational units involved and request the necessary information and evidence proving that the alleged incident did or did not take place and to examine witnesses, c) to have access to the Company's records (paper, electronic, audiovisual material) and to receive copies of relevant and necessary copies for the documentation of the decision on the complaint/report under review, in compliance with the principles of proportionality and necessity of the means and purpose of processing. Documents containing personal data that are not related or relevant to the content of the complaint shall not be taken into account and shall not be filed.

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- Evaluates the information and evidence collected and decides on the merits of the complaint. If the merits are not confirmed, the complaint shall be archived for a period of 5 years, following a reasoned decision by the Commission.
- If the complaint is assessed as justified, the Commission shall decide, on the basis of reasons, to take any appropriate and necessary measure to address the complained incident and to avoid the recurrence of similar behaviour (e.g. recommendation for compliance, change of job or working hours or way of providing work, replacement of an employee through a service provider, termination of a service contract, etc.). If the Committee determines the need to apply the disciplinary provisions of the Personnel Regulation, it submits a recommendation to the CEO or the official authorized by him for the conduct of an administrative review and further disciplinary action as provided for in the Regulation. In any case, the complainant may also be subject to criminal or civil liability, in accordance with the applicable legislation.
- Communicates the results of the investigation to the complainant and the complainant. Where the complainant is employed through a service provider, the Commission shall forward the findings of the investigation and the relevant file to the complainant's employer for information and further action.
- In the event that during the above procedure it is determined that no incident of violence or harassment took place and that the report/complaint submitted is malicious, the Committee will investigate the motives of the malicious complaint and will take all appropriate and necessary measures within the framework of the disciplinary provisions of the Company's Staff Regulations and the Code of Ethics and Professional Conduct.
- Monitors the implementation of the measures and decisions taken and evaluate their effectiveness at least annually.
- Submits an annual written report to the CEO of the Company, which records the outcome of the investigations and the measures taken or to be taken to address the alleged incident.

5.3. Prohibition of retaliation and further victimization against the aggrieved person

It should be noted that retaliatory actions (retaliation) against the complainant are prohibited and will not be tolerated. The Company commits that persons who file an internal complaint or facilitate its investigation will not be subject to retaliation (including but not limited to intimidation, threats, unfair treatment, demotion or deprivation of promotion, marginalization, differentiation of duties). Retaliation shall constitute disciplinary misconduct as defined in the Company's Personnel Regulations or failure to perform the terms of the service provider's contract.

The termination or termination in any way of the legal relationship on which the employment is based, as well as any other adverse treatment of the affected person, is prohibited and is null and void if it constitutes retaliatory behaviour or a countermeasure for incidents of violence and harassment.

5.4. Cooperation and provision of any relevant information to the competent authorities, if requested

The Company declares that it will cooperate with any competent public, administrative and judicial authority, to which it will provide assistance and access by any means or instrument and will disclose any information requested by them regarding any incidents of violence and harassment in the workplace.

6. CONFIDENTIALITY & PRIVACY

6.1. In the process of handling any report/complaint and dealing with incidents of violence and harassment at work, the conditions of confidentiality and discretion will be strictly observed both in the person of the complainant and in the person of the accused. The Company shall take appropriate measures to ensure the security of information and data gathered in the course of the investigation of complaints, in compliance with the legislation and its relevant Policies on the protection of personal data and information security.

6.2. In particular, the “Liaison” Office, which is located at the premises of the Executive Division of Human Resources of EYDAP S.A., maintains a Complaints Register for a period of five (5) years. The Register is kept in electronic and/or paper form, together with the data and documents accompanying a report/complaint, which are collected in the context of its investigation. The period of retention may be extended on a case-by-case basis and only if there are reasons to retain the data (e.g. investigation by administrative, judicial or other authorities, pending litigation, pending a decision by an authority, body or institution, etc.).

E.Y.D.A.P. S.A. as the Data Controller takes all necessary technical and organizational measures in accordance with the national and European legislation on personal data protection (EU 2016/679, Law 4624/2019) taking into account the policies and procedures it has established. The personal data collected from the initial stage of the submission of a report or its notification to the Association, as well as at any stage of its investigation until its filing, as mentioned above, are processed by the persons authorised under this Policy in order to verify the validity or otherwise of the report, to investigate the allegations and to take the measures proposed to deal with the alleged incident and to avoid the recurrence of similar behaviour. The legal basis for the processing of the personal data of the natural persons involved for the above mentioned processing purposes, as specified by this Policy, is the compliance of EYDAP S.A. with its legal obligations as derived from the current legislative framework in force to address violence and harassment at work (Law 4808/2021 and the relevant implementing legislation). Access to personal data is strictly limited to the contact persons and bodies designated by this Policy (Association, Committee, CEO), the competent organisational units to which a complaint/report may relate, but also to those persons possibly involved in the management and investigation of the reported incidents. The complainant shall have the right of access to the information in the file in order to support his/her allegations and to rebut the complainant's allegations. The competent bodies authorised by this Policy to receive and manage such complaints shall cooperate with any competent Public, Administrative or Judicial Authority which, either on its own initiative or following a request from an aggrieved person, requests data or information within its competence, and undertake to provide assistance and access to the data. Data subjects may contact the Data Protection Officer regarding their rights and for the provision of any relevant information regarding the processing of their personal data at the following e-mail address dpo@eydap.gr and at the contact telephone number 2107495156. It should be noted that in certain circumstances compelling and legitimate reasons for processing may override the interests, rights and freedoms of the data subject.

7. CHANNELS OF COMMUNICATION

Complaints pursuant to paragraph 5 and questions concerning the rights of the persons concerned may be submitted via the following e-mail address: syndesmos@eydap.gr or in person at the office of the 'Association' (DGAD, 156 Galati, Oropou) and by post to the 'Liaison' (156 Galati, Oropou).

The Compliance Department (email: gr_d_kansym@eydap.gr) is responsible for resolving any questions regarding the implementation of and compliance with this Policy.

8. FINAL PROVISIONS

The Executive Division of Human Resources is responsible for the implementation of this Policy, and the Regulatory Compliance Division for the monitoring of the implementation and its effectiveness.

The Regulatory Compliance Division recommends the updating of the Policy when necessary.

This Policy is approved and revised by resolution of the Company's Board of Directors and is posted on the Company's website.