

**POLICY FOR PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK AND TREATING AND ADDRESSING INTERNAL COMPLAINTS FOR INCIDENTS OF VIOLENCE AND HARASSMENT**

**I. EKME METALLURGICAL TECHNICAL - INDUSTRIAL & COMMERCIAL SOCIETE ANONYME, trading as EKME S.A.:**

Integrity and respect for all contribute to our success, are vital and an integral part of our corporate environment.

We have created a workplace, within which the personality of all employees is valued, who are given equal opportunities for development and growth. The respect and dignity of each individual employee is our immediate priority.

Our Company's corporate social policy is based on human rights. These set out our minimum work standards and act as a complement to our corporate values.

The Company, demonstrating zero tolerance for incidents of violence and harassment in the workplace, adopts this policy, in compliance with Articles 9 and 10 of Greek Law No. 4808/19.06.2021, which ratified the International Labour Convention 190/21.06. 2021 of the International Labour Organization (ILO), regarding eliminating violence and harassment in the world of work, the text of which was annexed to the text of the law, and which henceforth applies alongside the above-mentioned Policies.

**II. Purpose**

The purpose of this policy is to create and consolidate a work environment that respects, promotes and ensures human dignity and the right of every person to a world of work free of violence and harassment. **EKME S.A.** declares that it recognizes and respects the right of every employee to a work environment free of violence and harassment and that it does not tolerate any such behavior, of any form, by any person.

**III. Scope**

The scope of this application includes all types of staff members associated with the Company by means of:

- a dependent work contract (indefinite or fixed-term, full-time or part-time).
  - a project contact.
  - staff seconded by an EU member state or staff from third countries.
  - an independent service contract.
  - a salaried assignment.
  - an apprenticeship contract.
  - a loan contract.
- employed through third party service providers.
- volunteers.

- persons applying for work.
- persons whose employment relationship with the company has ended.

#### **IV. Prohibited forms of behavior - Definitions**

##### **Violence and harassment**

Means the forms of behavior, actions, practices or threats thereof, which aim at, lead or may lead to physical, psychological, sexual or financial harm, whether manifested individually or repeatedly.

##### **Harassment**

It means the forms of behavior that aim at or result in violating a person's dignity and creating an intimidating, hostile, demeaning, humiliating or aggressive environment, regardless of whether they constitute a form of discrimination, and they include also harassment based on gender or on other grounds of discrimination.

##### **Gender-based harassment**

It means the forms of behavior associated with a person's gender, which aim at or result in violating that person's dignity and creating an intimidating, hostile, demeaning, humiliating or aggressive environment. These forms of behavior include also the sexual harassment specified in Law 3896/2010, as well as forms of behavior associated with a person's sexual orientation, expression, identity or gender characteristics.

##### **What constitutes an incident of violence and harassment**

Such behaviors that may occur are, by way of indication, the following ones:

- Threatened or actual physical violence.
- Intimidation, oppression, stalking.
- Aggressive or threatening behavior causing fear to another person.
- Verbal hostility.
- Outright threats.
- Threats related to the job and working conditions.
- Offensive comments or jokes, which are about another person.
- Arrogant, condescending and disparaging comments.
- Acts of retaliation.
- Domestic violence extending to the workplace
- Sexual comments, jokes, gestures.
- Immoral and/or offensive comments about gender or sexual orientation.
- Indiscreet questions about personal or sex life.
- Sexual innuendos.
- Invitations to date or sexual contact.
- Unwanted touches, whistles, caresses, kisses.
- Stares or lustful gazes.
- Sending messages of erotic or sexual content (by phone or by e-mail)

### **What does NOT constitute an incident of violence and harassment**

- The direct supervision of employees, including setting performance expectations.
- Taking action to correct performance, such as placing an employee on a performance improvement plan.
- Assigning tasks and guidance on how and when they should be done.
- Request for information or reports on work progress.
- Approval or denial of permission.
- Request for documentation of absence on health grounds based on the applicable provisions.
- The moral or financial reward of excellent employee performance.
- Providing constructive feedback on work performance

### **Workplace**

It means a wider spatial context, in which incidents of violence and harassment can take place, namely:

- In the workplace, including public and private places and places where the employee provides work, receives remuneration, takes a break or rests, in areas of personal hygiene and care.
- In commuting to and from work, other types of commuting, business travel, education, as well as work-related events and social activities.
- During work-related communications, including those made through information and communication technologies (company e-mails and mobile phones).

### **Domestic violence**

All acts of physical, sexual, psychological or financial violence that take place within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners, and regardless of whether the perpetrator shares or previously shared the same residence with the victim.

Domestic violence that takes place in the workplace, for example through physical violence, sexual harassment and stalking by current or former partners, is a serious form of workplace violence. Acts of domestic violence, including stalking/pursuing, can also be committed by people in the same work environment, with whom they have (or have had) close relationships.

Domestic violence, in any of the above forms, inflicted on the employee during teleworking.

## **V. Company Obligations - Measures for Preventing Violence and Harassment.**

The Company declares, once again, its **zero tolerance** for any incident of violence and harassment, in whatever form it may take, including sexual harassment and gender-based violence, which takes place at or on the occasion of work, by an

employee against another employee, by a supervisor, by an authorized person, which means an employer, by a customer, visitor, supplier and any third party. The Company takes all appropriate and necessary measures, on the one hand, in order to prevent and, on the other hand, to address and manage such incidents and forms of behavior.

More specifically, the Company:

- Provides information, as well as appropriate training to its employees on addressing and managing incidents of violence and harassment, on their responsibilities and rights.
- Collaborates with the competent Occupational Physician, in order to update the Occupational Risk Assessment Study, so as to include psychosocial risks, including risks of violence and harassment at work, and the prevention of incidents of violence and harassment in the workplace.
- Monitors the implementation of this policy and takes measures against employees who fail to comply.
- Ensures a safe and fair working environment.
- Imposes the necessary and appropriate sanctions in the event that any employee, customer, visitor, supervisor is found to be manifesting a form of prohibited behavior.

## **VI. Rights and Obligations of employees**

Every employee is entitled to:

- be treated with respect and courtesy
- not to be the recipient of violent behavior, harassment, including sexual and gender-based violence, discriminatory treatment

and intimidation.

- report any incident of prohibited behavior in the workplace (in accordance with this policy, as detailed below), without being victimized or suffering any other adverse consequence or retaliation.

Every employee is obliged to:

- comply with this policy and all applicable and valid procedures for the purpose of both his personal protection and that of other employees in the company.
- immediately report any incident of violence and harassment to his supervisor.
- cooperate in case of investigation of any complaint, which may have been submitted according to the procedure below.
- participate in actions and training programs of the Company regarding incidents of violence and harassment.

## **VII. Additional obligations of Directors and supervisors**

In particular, the company's Directors and supervisors are also obliged to:

- ensure the implementation of this policy in their area of responsibility.
- set appropriate standards of behavior in their area of responsibility.

- avoid engaging in undesirable and prohibited behaviors, in the context of performing their duties.
- act immediately when they become aware of any manifestation of prohibited behavior.
- encourage employees so that they report any incidents of violence and harassment that they have experienced or that came to their attention.
- immediately inform the Company Management of any incidents of violence and harassment that took place in their area of responsibility.

### **VIII. Guidelines for preventing and addressing incidents of violence and harassment**

To prevent and address incidents of violence and harassment in the workplace, employees should:

- Seek comprehensive and objective information related to the legislation on violence and harassment and the protection mechanisms. The Company may provide assistance and information regarding such matters
- Participate in actions and programs aimed at combating stereotypes, prejudices and adverse discrimination.
- Correct their behavior when they realize that it bothers or offends a colleague or partner.
- Define their individual boundaries to those around them.
- Not ignore incidents of violence and harassment.
- Not feel uncomfortable, ashamed, or reproach themselves for the offender's behavior.
- Not justify the offender's behavior.
- Repel or address calmly and decisively violent or harassing behavior.
- Keep a log of incidents of violence and harassment.
- Inform their supervisor or the company through informal, open and honest dialog.
- Email a written complaint for further support to: [idgetriadis@ekme.gr](mailto:idgetriadis@ekme.gr) if no solution was reached regarding the complaint concerning violent or harassing behavior at work.

### **IX. Procedure for Submitting and Managing Internal Complaints – Reference Person**

Any employee who has been victim of any incident of violence and harassment may submit a verbal or written complaint to the Health, Safety and Environment Officer Mr. Ioannis Dimitriadis, who is also defined as "reference person", for this policy. The complaint can be submitted in person or via e-mail, specifically to the e-mail address: [idgetriadis@ekme.gr](mailto:idgetriadis@ekme.gr). The complaint cannot be made anonymously.

The complaint should include the details of the alleged harasser, i.e. the person who engaged in a form of prohibited behavior, as well as the specific incident(s) that substantiate it.

The Health, Safety and Environment Officer thoroughly investigates each complaint and collects any necessary information about it. Complaints and investigations remain strictly confidential as much as possible, taking into account the sensitivity of the case and the privacy of all involved.

In particular, he may speak with the complainant and the alleged harasser, interview witnesses, request the production of any documents that may exist and prove that any incident of violence and harassment occurred or not and communicate with the heads of each department, if the complaint is addressed to them.

Once the Health, Safety and Environment Officer completes his investigation, he submits a written report to the company's Management, in which he states the result of the investigations. The results of the investigation are also communicated to both the complainant and the alleged harasser, in order for them to take cognizance of them. The completion of the investigation and the submission and communication of the conclusion of the Human Resources Manager must take place as soon as possible and, in any case, no later than a period of 3 weeks from the date the complainant submitted the complaint.

In the event that an incident of violence and harassment actually occurred, the Company's Management will accordingly take all necessary, suitable and appropriate measures against the alleged harasser. Such measures may include but are not limited to:

- a) the warning procedure.
- b) change of his job position, hours, place and way of providing work.
- c) termination of the contract of employment or cooperation with the company.

#### **X. Rights of victims**

Under the current legislation, every person that becomes victim of violence and harassment has the right to leave the workplace for a reasonable time, without loss 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, in particular, when the employer is the perpetrator of such behavior or when the latter does not take the necessary appropriate measures to restore work peace, or when such measures are not sufficient to stop the violent and harassing behavior.

In this case, the person leaving is obliged to inform the "reference person" beforehand in writing, mentioning the incident of violence and harassment and the incidents that justify his/her belief that there is an imminent serious risk to his/her life, health or safety.

In addition, employees who face incidents of violence and harassment at work have the right to appeal to the competent authorities, as defined by the legislation (a. right to judicial protection, b. right to appeal and submit a complaint and request for a labor dispute to the Labor Inspection, within the framework of the legal powers granted to it, c. report to the Ombudsman, within the framework of the legal powers granted to him).

#### **XI. Requirement of impartiality and confidentiality**

The Health, Safety and Environment Officer is required to act during the process of complaint investigation in an objective and impartial manner. Moreover, he must behave with respect to all parties involved and in a confidential and discreet manner. The disclosure or notification to parties not involved of information concerning the complaint under review is completely prohibited.

The above requirements also fall on the Company's Management during the final stage of taking measures and decisions.

#### **XII. Prohibition of Retaliation - Victimization of the Complainant**

It is prohibited to retaliate against and victimize the complainant who, as an affected person, asserted his/her rights and submitted a written complaint regarding an incident of violence and harassment. Retaliating against and victimizing the complainant is a serious violation of this policy and leads to consequences for the person doing so.

#### **XIII. Cooperation with administrative and judicial authorities**

In the event that the affected person has reported the incident of violence and harassment before any administrative or judicial authority, the company commits itself to provide any necessary help and assistance, as well as any information it may have to the competent authorities.

#### **XIV. Cases of Domestic Violence**

The Company takes, as far as possible, measures to protect employment and support employees who become victims of domestic violence.

Any employee who has suffered domestic violence, which also extends to the workplace, may report this fact orally or in writing to his/her supervisor or the Personnel Manager in order to inform the company and let it take the appropriate and necessary measures.

#### **XV. Deviations**

Deviations from the application of this Policy cannot take place. Employees needing more information or having questions about this policy may contact their supervisor or the Health, Safety and Environment Officer.

This Policy will be available on our company's official website at the following link:  
<https://www.ekme.gr/content/EKME-HARASSMENT-POLICY.pdf>

## **Appendix – External Sources of Nationwide Information**

### **Contact details for the competent**

#### **authorities SEPE (Labor Inspection) complaints** **telephone line**

- Call the Citizen Service Line **1555** (24-hour)

#### **Hellenic Police**

- Call **100** (24-hour)

#### **Domestic violence**

- Call **100** (24-hour).
- If you can't talk, text to 100.
- For more information, visit the following website of the Hellenic Police on domestic violence  
[http://www.astynomia.gr/index.php?option=ozo\\_content&perform=view&id=2030&Itemid=421&lang](http://www.astynomia.gr/index.php?option=ozo_content&perform=view&id=2030&Itemid=421&lang)
- Call 15900 (24-hour)

#### **General Secretariat for Demography and Family Policy and Gender Equality (G.G.I.F.):**

- Call **15900** (24-hour)
- If you can't talk, send an e-mail to [sos15900@isotita.gr](mailto:sos15900@isotita.gr)

#### **Useful Websites**

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