



Policy on Prevention and Combating violence and Harassment at Work



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Policy on preventing and combating violence and harassment at work

KRV in compliance with the provisions of Part II of Law No. 4808/2021 on the prevention and response to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, and in particular Articles 9 and 10 of Law 4808/2021, the following policy on the prevention and response to violence and harassment at work is adopted. At the same time, it incorporates in its policy the management of internal complaints about incidents of violence and harassment.



PURPOSE

KRV respects the right of every employee to a work environment free of violence and harassment and that it has zero tolerance for such behaviour, in any form and by any person.

The aim of the policy is to create and consolidate a working environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment.

Therefore the purpose of this policy is to:

- i. the prevention, treatment and elimination of all forms of violence and harassment, whether related to or arising from work.
- ii. promptly identifying cases of harassment and/or oppression by verifying incidents using effective complaint reporting methods,
- iii. the notification to all executives, employees, external partners, customers and third parties who come into direct contact with the company that any form of harassment and violence are unacceptable in the company.

FIELD OF APPLICATION

This policy includes the persons listed in par. 1 of article 3 of Law no. 4808/2021 and in particular all members of the Board of Directors of the Company, employees and employees regardless of their contractual/employment status, including employees with a dependent employment contract, employees with a project contract, trainees and employees whose employment relationship with the Company has ended, as well as prospective employees and other persons dealing or cooperating with the Company.

ASSESSMENT OF RISKS OF VIOLENCE AND HARASSMENT AT WORK - DEFINITIONS

- i. 'violence and harassment' means any form of conduct, acts, practices or threats thereof, whether occurring in isolation or repeatedly, intended to cause, resulting in or likely to result in physical, psychological, sexual or economic harm,
- ii. 'harassment' means conduct that has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, dehumanising or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment based on sex or other grounds of discrimination
- iii. "gender-based harassment" means forms of conduct related to the gender of a person, which have the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, degrading, humiliating or aggressive environment as defined in Article 2 of Law No. 3896/2010 (A' 107) and par. 2 of Article 2 of Law No. 4443/2016 (A' 232). These forms of conduct include sexual harassment under Art. 3896/2010, as well as forms of conduct related to the sexual orientation, expression, identity or gender characteristics of the person.

The forms of violence and harassment prohibited by this policy include, but are not limited to:

- Insulting someone primarily and not limited to discrimination on the basis of gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices, threats, verbal or gestural, swearing in public or in private, belittling or ridiculing a person or his or her abilities, whether in private or in front of others, outbursts of anger against a person, or making persistent or unjustified criticism.



- Abusive, malicious, derogatory, obscene or mocking comments and the dissemination thereof, innuendo, sexist or racist "jokes" and comments, the use of offensive language, verbal sexual harassment or suggestions, implying that one's sexual favors may advance one's career or that refusal to engage in a sexual relationship may adversely affect one's career with the Company, offering benefits (e.g.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; retaliating or threatening to retaliate after rejecting sexual advances.
- Cyberbullying, sending messages with harassing and offensive content via SMS, e-mail, social media, fax or letter, asking offensive and persistent questions about age, marital status, personal life, sexual orientation, and similar questions about race or nationality, including cultural identity and religion. The above includes visual forms of harassment such as posters, cartoons, caricatures, photographs or drawings that are derogatory based on characteristics protected by law.
- Physical unwanted contact such as touching, pinching, sexual gestures, hitting, grabbing, pushing and all kinds of physical violence. Invasion of privacy, intentional partial or total destruction of personal belongings, vehicles or property, interference with or obstruction of the normal working, movement and physical integrity of the person, physical blocking or confinement, sexual gestures, physical surveillance, stalking.
- It is expressly provided that they shall be treated as acts of violence and harassment and that retaliation and acts of retaliation or intimidation against another employee or third party who opposes violence or any form of harassment, makes a complaint, testifies, assists or participates in any process of investigating an incident against the complainant and further victimisation of the aggrieved person are expressly prohibited

MEASURES FOR THE PREVENTION, CONTROL, CONTAINMENT AND MANAGEMENT OF SUCH RISKS AND FOR THE MONITORING OF SUCH INCIDENTS OR FORMS

As part of its general policy for the prevention and response to incidents of violence and harassment at work, KRV takes the following actions:

- Inform and train staff using the most appropriate means available to ensure that all staff are aware of this policy and the procedures provided for in it, as well as the possibilities provided by law in the event of incidents of violence or harassment at work.
- These actions include, among other things, informing staff by posting in a prominent place or sending via e-mail to the professional e-mail addresses of staff the details of the competent administrative authorities to which every affected person has the right to appeal (Labour Inspectorate) and in particular the telephone line for complaints to the SEPE (15512) and the citizens' helpline 1555 and the e-mail address <https://1555.gov.gr/>, as well as the direct psychological support and counselling service for the staff of the SEPE.
- It trains and informs its staff in every appropriate way in order to recognise and identify discrimination, violence and harassment at work and to provide the necessary support to its staff and partners.
- It establishes, within the framework of this policy, a procedure for receiving and examining complaints about the above-mentioned phenomena, while designating a specific person as a reference person ("liaison") within the company, responsible for guiding and informing employees about the prevention and response to violence and harassment, as well as for handling complaints. Included within these procedures is provision for disciplinary sanctions for anyone found to be :



- that he or she engaged in any form of harassment or violence, and anyone who assisted in or knew of such acts or deliberately concealed them.
- It expressly prohibits retaliation against the complainant and further victimisation of the person affected.
- It is committed that complaints and harassment proceedings will be treated confidentially and dealt with impartially.

PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS

Any employee of KRV or a third party who is in any way related to him/her believes that he/she has been subjected to discrimination, violence or any form of harassment, or if he/she has noticed that such behaviour is taking place in the work environment, may report/report it as set out below.

The reporting person in relation to this policy and the management of incidents of violence and harassment at work is the respective Corporate Social Responsibility Officer and Human Resources Manager of the company.

All queries relating to the implementation or interpretation of this policy to the reference person who is responsible for and manages all matters relating to information and counselling of staff, as well as matters relating to the prevention and management of violence and harassment in the workplace. Complaints and/or complaints by the persons concerned about behaviour involving violence or harassment shall also be submitted to the reporting person, who shall deal with them as set out below.

Complaints about conduct that constitutes a violation of this policy are accepted in writing, either with name or anonymously, at the dedicated email address hr@krv.gr, which is accessible only to the reporting person.

Complaints are investigated by the reporting person promptly and thoroughly, impartially and in compliance with the principles of confidentiality and protection of the personal data of the alleged victims and the complainants.

In particular, the reporting person collects and evaluates the complaint, recording and characterizing it. The reference person, if the complaint has been made by name, then contacts the complainant, informs him/her of the following options for managing the incident and asks him/her how he/she wishes to initiate the management process.

It is noted that complainants have the right to be informed of the receipt of their complaint and the progress of its examination.

In order to avoid worsening the position of the complainant, as well as to ensure the integrity of the investigation, the reporting person must recommend to the company's management to take all necessary measures, such as moving employees or modifying their working hours or the way they are provided (e.g. telecommuting), modify their working hours until the investigation is completed.

In particular, the following procedures may be followed following a complaint:

- Mediation of the reference person and reaching a settlement through an invited discussion and hearing of two parties. Once the circumstances complained of have been resolved and the incident is deemed to have ended, the procedure not taking more than 10 working days, the person shall prepare a report on the incident and its development and inform the CEO of the company.
- If the complainant does not wish to follow the above procedure, or if the above procedure is unsuccessful, as well as in the case of an anonymous complaint, the reporting person shall draw up a relevant conclusion with the findings of his/her investigation, with a simultaneous characterisation of any observed behaviour of violence or harassment and its degree, which shall be submitted within 10 working days



from the receipt of the complaint to the Board of Directors, which is also the competent authority to decide on the submission of sanctions.

The Board of Directors of the Company, if it determines that the alleged incident of violence or harassment or discriminatory treatment has indeed taken place, will decide on the appropriate corrective measures and the imposition of disciplinary sanctions against the complainant, depending on the gravity of the incident, which may include, but not limited to:

- i. an oral or written reprimand or recommendation to comply
- ii. a change of position, working hours, place or manner of performing the work
- iii. the termination of the employment contract or cooperation agreement

Complaints which are proven to be manifestly unfounded or malicious will be filed as inadmissible, and in case the company's management deems it necessary, they will be further investigated to restore order and avoid distortion of the objectives pursued by this.

This policy and the above procedure are applied in parallel and complementary to the general legislation in force for the protection of the employee's personality and do not affect the employee's legal rights under civil and criminal law.

The employee or officer who engages in such prohibited conduct bears full and exclusive responsibility for his/her actions and if the case follows the judicial route, Lino Group undertakes to cooperate with the Competent Authorities and to provide any relevant information upon request.

More generally, the company and its designated reporting person undertake to cooperate with any competent public, administrative or judicial authority which, either on its own initiative or following a request by an affected person, requests data or information within its competence, and undertake to provide assistance and access to the data. To this end, any information they collect, in whatever form, shall be kept in a relevant file, subject to the provisions of the law on the protection of personal data.

At the end of the calendar year, a report shall be drawn up by the reporting person on the incidents (without mentioning any persons by name), the type and evolution of the incidents managed.

The adoption of the policy texts of articles 9 & 10 of Law 4808/2021 is completed by the company's actions to inform employees and their representatives by posting them at the workplace, on the notice board and on the company's website, while informing them in writing or by e-mail or by any other appropriate means. In the event of amendments to the policy texts, the company has the same obligation to consult and inform employees and their representatives as when the policy was originally adopted.