



PIRAEUS PORT AUTHORITY S.A.
POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT AT
WORK AND FOR THE MANAGEMENT OF INTERNAL COMPLAINTS
ABOUT INCIDENTS OF VIOLENCE AND HARASSMENT



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PPA SA, 10 AKTI MIAOYLI STR., 185 38 PIRAEUS

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POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT AT WORK & FOR THE MANAGEMENT OF INTERNAL COMPLAINTS ABOUT INCIDENTS OF VIOLENCE AND HARASSMENT

PREAMBLE

«PPA S.A.», (henceforth the "Company") complies with all measures and obligations regarding the implementation of the provisions of part II of Law 4808/2021 for the prevention and treatment of any form of violence and harassment, including violence and gender-based and sexual harassment.

1. PURPOSE OF THIS POLICY

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 discriminations, violence and harassment. The Company declares that it recognizes and respects the right of every employee to a work environment with equal opportunities, free of discriminations, violence and harassment and does not tolerate any form of violence and harassment that occurs in the course of work or is connected to it or arises from it, including violence and harassment due to gender and sexual harassment.

2. SCOPE – SUBORDINATE PERSONS

This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the delegated legislation and covers the persons of par. 1 of article 3 of Law 4808/2021, i.e. workers and employees, regardless of their contractual status, including those employed under a project contract, independent services, salaried mandate, those employed through third party service providers, persons attending training, including interns and apprentices, volunteers, people whose employment relationship has ended, people applying for work and other people who deal with or collaborate with it.

3. PROHIBITED CONDUCT – DEFINITIONS

A. Violence and Harassment. "Violence and harassment" mean forms of behavior, acts, practices or threats thereof, which are intended, lead to or may lead to physical, psychological, sexual or financial harm, whether they occur individually or repeatedly.

B. Harassment. "Harassment" means forms of behavior that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, humiliating, degrading or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or other grounds of discrimination.

C. Gender Harassment. "Gender-based harassment" means forms of behavior linked to a person's gender, which have the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, humiliating, degrading or aggressive environment in accordance with Article 2 of Law 3896/2010 (A' 107) and paragraph 2 of Article 2 of Law 4443/2016 (A' 232). These forms of behavior include the

sexual harassment of Law 3896/2010, as well as forms of behavior linked to the sexual orientation, expression, identity or gender characteristics of the person.

D. Discrimination. "Discrimination" means the different treatment of people arising from prejudices or interests, any act by which individuals are unjustifiably separated on the basis of the groups, classes or other categories to which they belong or are perceived to belong. For example, discrimination based on sex, age, language, nationality, race or ethnicity, disability or chronic disease, religious or other belief or sexual orientation.

4. WHAT CONSTITUTES AN INCIDENT OF VIOLENCE AND HARASSMENT

The types of conduct prohibited by this policy include, but are not limited to:

- Insult based on discrimination based on gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices, threats, verbal or with gestures, insults in public or in private, belittling or ridiculing a person or their abilities, whether in private or in front of others, threatened or actual physical violence, persistent or unjustified criticism.

- The use and dissemination of abusive, malicious, derogatory, obscene or derisive comments, innuendos, sexist or racist "jokes" and comments, use of offensive language, verbal sexual harassment or suggestions, insinuations that someone's sexual favors can advance their career or that the refusal to enter into a sexual relationship may negatively affect his career path in the Company, the offer of benefits (eg, a promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sex" 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, persistent and/or offensive questions about age, marital status, personal life without lawful reason or justification, sexual orientation, and similar questions about race or ethnicity, including cultural identity and religion.

- Also included are visual forms of harassment such as e.g. posters, cartoons, photographs or designs that are derogatory based on characteristics protected by law.

- Unwanted physical contact such as touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing as well as physical violence of any kind.

- Invasion of privacy, intentional partial or total destruction of personal belongings, vehicles or property, interference with or obstruction of a person's normal work, movement and physical integrity, physical exclusion or confinement, sexual gestures, physical surveillance, the pursuit.

The above acts are indicative and do not constitute an exclusive list of prohibited acts.

5. RETALIATION

The Company also prohibits any employee or third party, in any way connected with it, from taking retaliatory actions against another employee or third party who opposes violence or any form of harassment, files a complaint, reports as a witness, assists or participates in any proceeding of incident investigation.

The Company protects the persons who file a complaint as well as the persons mentioned in complaints. More specifically the Company ensures the non-existence of retaliation to anyone who in good will proceeds to a complaint and ensures that they will not suffer harassment or marginalization, bullying or threats or unfair treatment as a result of their complaint.

Furthermore, the termination or in any way dissolution of the legal relationship on which the employment is based, as well as any other adverse treatment of the affected person, is prohibited and void, as long as it constitutes retaliatory behavior or a countermeasure for reporting an incident of violence and harassment.

6. SCOPE – DETERMINATION OF THE WORK AREA

A workplace is a wider spatial context in which incidents of violence and harassment can take place. The above forms of behavior may take place in all the company's facilities, in which employees provide their services, as well as in those areas where they take a break for rest or food, in personal hygiene areas and care, changing rooms or accommodation provided by the company to staff.

Also, this policy covers all types of travel to and from work, other travel, travel, conferences, training, as well as social events and activities related to work or connected to the actions of the company. Finally, it also applies to all communications related to the Company, including those carried out through IT and communication technologies (e.g. e-mails, team meetings, social media, etc.).

7. DOMESTIC VIOLENCE

The concept of domestic violence includes all acts of physical, sexual, psychological or financial violence that take place within the family or home, regardless of biological or legal family ties, between former or current spouses or partners, and regardless of whether the perpetrator shares or has shared in past the same residence with the victim. The domestic violence that takes place in the workplace, including but not limited to physical violence, sexual harassment and stalking by current or former partners, is a serious form of workplace violence. Acts of domestic violence, including stalking, 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, is considered to be practiced on the employee during telework as well.

8. ASSESSMENT OF THE RISKS OF VIOLENCE AND HARASSMENT AT WORK

A. Assessment of risk factors and their improvement.

The company assesses and investigates in cooperation with competent occupational doctor regarding the possible risk factors depending on the nature and scope of the work provided, the psychosocial risks,

including the risks of violence and harassment at work, in order to evaluate the existing working conditions and readjust them in such a way as to limit as much as possible the chances of an incident of violence and harassment taking place in the workplace. Indicative cases of risk are mentioned such as: high stress in the workplace, isolated or closed workplaces, distribution of jobs, safety of facilities and their control, lack of appropriate training, people with a history of violent behavior, working in an isolated area.

B. Modes of prevention

The Company, within the framework of its capabilities, takes every appropriate and necessary measure and makes every reasonable adjustment to the working conditions with the aim, on one hand, to prevent and on the other hand to deal with and manage such incidents and forms of behavior.

9. MEASURES TO PREVENT INCIDENTS OF VIOLENCE AND HARASSMENT.

The Company takes all the necessary measures to inform and raise awareness of the staff, using appropriate means to combat discrimination, violence and harassment, ensuring that everyone is aware of the company's policy and procedures in relation to incidents of discriminations, violence and harassment, they know who they can turn to in case of violence or harassment, as well as the possibilities given to them by the law.

Indicative:

- Encourages all the employees/partners to maintain a working climate where respect for human dignity, cooperation and mutual assistance are key values.
- Ensures open communication with Management and direct supervisors and colleagues.
- Establishes a specific procedure for managing reports/complaints, as specified in the corresponding chapter of this policy.
- Receives, investigates and manages any complaint or related report, demonstrating zero tolerance for violence and harassment, with confidentiality and in a manner that respects human dignity. It follows every prescribed procedure, respecting the principle of confidentiality and the protection of the personal data of those involved.
- Ensures that employees have the necessary training/information to perform their duties, particularly in jobs that have a higher risk of incidents of violence and harassment.
- Guides and supports victims of violence and harassment, as well as victims of domestic violence in their reintegration into the workplace, by any appropriate means or reasonable accommodation.
- Evaluates on a regular basis the effectiveness of applied preventive measures and countermeasures and revises / updates the assessment of risks and measures.

10. PERSON OF REFERENCE – COMPLAINT MANAGEMENT TEAM

Appointment of Reference Person

Any employee against whom any incident of violence and harassment has occurred, may submit a complaint to the **Violence and Harassment Incidents Reference Person**. The **Secretary of the Disciplinary Board** is appointed as Person of Reference for this policy and may be replaced by the **Deputy Secretary of the Disciplinary Board**.

Complaint Management Team

For the management of the Complaints, a team is appointed, consisting of the Regulatory Compliance Manager, the Human Resources Manager and the Deputy Human Resources Manager.

The reporting person's role is informational: it is to guide and inform employees / partners, regardless of whether or not they contact them about an incident or complaint of violence and harassment. The access of the employees to the reference person will be easy and immediate and in particular they will communicate with him/her through the electronic mail address (**e-mail odk@olp.gr**) or via a mail folder marked "personal and confidential". For general information and guidance, the communication may also take place via the above methods or by phone or in person.

In any case, it is the obligation of the aforementioned person, of the Complaint Management Team and of the executives of the Human Resources Department who manage and examine the above complaints, the protection of Personal Data, which may come to their knowledge during the exercise of their role.

To avoid any doubt, the above competent persons must inform the victims of their right, at any stage of the procedure followed within the company, to also submit a complaint to the competent administrative authorities within their competence (Labor Inspection and Citizen's Advocate) as well as to the judicial authorities, at their choice.

11. COMPLAINT RECEIVING AND EXAMINATION PROCEDURE

The company establishes a special procedure regarding the stages of reporting issues of protection from harassment and violence. This procedure captures the immediate actions to be taken in case of protection issues. Within this context, a special complaint-reporting mechanism is established to identify and report problems and violations of the relevant legislation, ensuring: a) direct communication and access to the person responsible for receiving the report as well as, b) appropriate support and legal assistance when needed.

Step 1: Start of the complaint process

- The complaint can be submitted in person, or via email to odk@olp.gr, or via post to the address Akti Miaouli 10, 185 38 Piraeus, to "HR Department, Reference Person".
- The complaint can be made named or anonymously. It is noted that an anonymous complaint is of limited legal validity, and may be dismissed if there is no supportive evidence.
- The complaint should include the information of the person complained of, i.e. the person who engaged in a form of prohibited behavior, as well as the specific incident(s) that substantiate it.

- The complaint should also be notified to the relevant trade union bodies, in accordance with the General Staff Regulation and the consent of the complainant.

Step 2: Investigation of the Complaint

The reference person informs the Complaint Management Team and under its guidance, thoroughly investigates each complaint and collects any necessary information about it. Complaints and investigations remain strictly confidential to the maximum extent possible, taking into account the sensitivity of the case and the privacy of all involved.

In particular, the Complaint Management Team or the reference person, may:

- speak with the complainant
- speak with the person complained of,
- examine witnesses,
- request the production of documents that may exist and from which it is proven that any incident of violence and harassment took place or not and
- communicate with the heads of each department, in case which the complainant addressed to them.

The receipt, investigation and management of complaints is carried out promptly and impartially, in a manner that respects human dignity and ensuring the protection of the confidentiality and personal data of victims and complainants collected in the exercise of the above duties.

Step 3: Completion of research and decision making

The investigation is completed within one (1) month at the latest for incidents investigated by the reporting person/team and within four (4) months for incidents investigated by the Disciplinary Board.

In the event that the complaint is directed against a member of the Complaint Management Team, or the reference person, or one of them finds themselves in a conflict of interest situation, then this person is replaced by another member appointed by the top Management.

The competent persons participating in the investigation, based on the above data, judge the merits of the complaint and take the following actions:

- Preparation of a written report with the results of the investigations.
- Submission of the written report to Top Management members, and specifically to the Deputy CEO in charge of the Human Resources Department and Deputy CEO in charge of the affected person's Department, who in turn decide jointly on whether the report is required to be communicated to all members of the Top Management and its decision taking bodies.
- Disclosure of investigation result to both the complainant and the complained-of, in order for them to become aware of it. The completion of the investigation and the submission and communication of the reporting person's conclusion must take place as soon as possible and, in any case, no later than the period foreseen for the completion of the investigation.

The conclusion is communicated to the competent disciplinary bodies of the company according to the Staff Regulations, in which representatives of the employees participate.

The company undertakes to comply with the obligation to prohibit retaliation, in accordance with article 13 of Law 4808/2021 and the provisions of the labor legislation.

In the event that an incident of discrimination, violence or harassment or retaliation actually occurs, the Company's Management will, on a case-by-case basis, take all necessary, appropriate and proportionate measures against the person complained of.

These measures may include indicatively:

- a) compliance recommendation,
- b) changing job position, hours, place and way of providing work,
- c) strengthening the education and training of the staff regarding the importance of combating violence, harassment and the violation of equal opportunities, through the provision of relevant information to the staff at regular intervals in order to avoid the occurrence of phenomena related to the above.

The above procedure is complemented by the provisions of the Disciplinary Law of the General Staff Regulations.

Complaints that proven to be clearly malicious will be considered unacceptable and will be further investigated at the discretion of the company, both in terms of motives and those involved, in order to restore order by any legal means.

12. RIGHTS OF VICTIMS

Every employee / partner of the company who is affected by an incident of violence and harassment against them, have the following rights:

- Judicial protection.
- Appealing, submitting a complaint and submit a Labor Complaint to the Labor Inspectorate, within the framework of its legal powers.
- Reporting to the Ombudsman, within the framework of their legal powers, as a body promoting and supervising the principle of equal treatment.
- Complaint within the company in accordance with this policy.

In any case, when there is a report or complaint of such behavior within the company, the affected person retains every right to appeal to any competent authority.

The existence of this Policy is not intended to, nor can it, discourage or exclude or prevent the complainant from exercising his rights provided by the applicable legislation and seeking solutions through judicial or extrajudicial means through the competent administrative or judicial authorities.

Any person who experiences an incident 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 their reasonable belief there is an imminent serious danger to their life, health or safety, and until adequate measures are taken to stop the violent and harassing behavior.

In this case, the leaver is obliged to inform the company beforehand in writing, stating the incident of violence and harassment and the incidents that justify their belief that there is an imminent serious risk to their life, health or safety. As long as the risk does not exist or has ceased to exist and this person refuses to return to the workplace, the company can appeal to the Labor Inspectorate with a request to resolve the dispute.

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 of the affected person, which covers their positive and collateral damage, as well as moral damage.

With reference to the burden of proving of the complaint, before a court or other competent authority, paragraph 1 of article 24 of Law 3896/2010, to which Article 15 of Law 4808/2021 refers, applies.

13. COOPERATION WITH ADMINISTRATIVE AND JUDICIAL AUTHORITIES

The Company, as well as any competent person or agency for the reception and management of such complaints at the corporate level cooperates with any competent public, administrative or judicial authority, which, either ex officio or upon submission of a request by an affected person, within the scope of its competence, requests the provision of data or information and undertake to provide assistance and access to the data. Any information collected, in any form, is kept in a relevant file in compliance with the provisions of Law 4624/2019 (A' 137) "Personal Data Protection Principle, implementing measures of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons against data processing."

14. CASES OF DOMESTIC VIOLENCE

The Company takes, as far as possible, measures to protect employment and support employee victims of domestic violence. Any employee who has suffered domestic violence, which also extends to the workplace, may report this fact verbally or in writing to their supervisor and to the Reference Person in order for the company to be informed and to take the appropriate and necessary measures.

Employment protection and support for employees / partners of victims of domestic violence

The company, proving in practice its social responsibility towards the phenomenon of domestic violence, adopts the following measures:

- Protecting the employment of victims of domestic violence by any appropriate means or reasonable accommodation.
- Provision of flexible work arrangements at the request of the employee / partner, a victim of domestic violence, with the aim of supporting them in maintaining their job and in their smooth reintegration after such incidents, especially in cases where there are minor children or children with disabilities or serious illnesses.

15. EXCEPTIONS

Deviations from the application of this Policy cannot take place. Employees who need more information or have questions about this policy can contact the Reference Person or any member of the Complaint Management Team.

This Policy will be posted on the company's bulletin board as well as is notified to each employee under the responsibility of the Department in which he/she serves.