

**Policy to prevent and combat violence  
and harassment**



## **1. Introduction**

DEPA COMMERCIAL S.A. has zero tolerance to incidents of violence and harassment in the workplace. By virtue of its 2014 Code of Conduct and Ethics (Article 8 of the CC&E), the Company adopted a corporate policy as an obligation of all employees, in order to establish a stable, healthy and safe workplace and maintain a positive work environment which promotes the good work of our Company and unleashes the true potential of our employees. One of the key factors that contribute to the establishment and maintenance of a positive work environment and the development of harmonious relations between employees is being respectful of colleagues and third parties. DEPA's executives, employees and partners should all respect our colleagues and anyone doing business with the Company and comply with the applicable legislation on equal opportunities. This means that we have to be polite and cooperative. We should be suitably attired and behave in a socially appropriate business-like fashion. DEPA shall not tolerate any sexual or other form of harassment against any employees or third parties dealing with the Company. If an employee or partner considers that they have been the victim of sexual or other form of harassment (racial, religious, etc.), they must submit a written complaint.

DEPA COMMERCIAL S.A. complies with all measures and obligations pertaining to the implementation of Law 4808/2021, Part II, on the prevention against all forms of violence and harassment, including gender-based violence and harassment and sexual harassment and adopts this policy in compliance with Articles 9 and 10 of Law 4808/2021 and the regulatory legislation in implementation thereof. Law 4808/2021 ratified ILO Convention No. 190/21.06.2021 on eliminating violence and harassment in the world of work and this international treaty's initial text was incorporated by full text in this law. This policy applies alongside and in interaction with the 2002 INTERNAL LABOUR REGULATION published by the Hellenic Confederation of Commerce and Entrepreneurship (ESEE) and DEPA's own 2014 Code of Business Conduct and Ethics.

## **2. Purpose**

The purpose of this policy is to create and consolidate a work environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment. DEPA COMMERCIAL S.A. declares that it recognises, respects and protects the right of every employee to a work environment free of violence and harassment and no such conduct, in any form and by any person, shall ever be tolerated.

## **3. Scope – Persons covered**

This policy covers the persons of Article 3(1) of Law 4808/2021 and its scope and protection includes all of DEPA's workers and employees, irrespective of their contract status, including any employees under temporary work contracts, providers of independent services, employees under salaried assignment contracts, employees through third-party service providers, persons in training, including trainees and interns, volunteers, persons whose employment contract has ended, persons seeking employment and other persons who have dealings or work with the Company.

## 4. PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK

### 4.1 Definitions

- **Violence and harassment** The term "violence and harassment" refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm.
- **Harassment** The term "harassment" refers to all forms of conduct with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not it constitutes a form of discrimination, including gender-based harassment or other reasons of discrimination.
- **Gender-based harassment** The term "gender-based harassment" refers to all forms of conduct directed at persons because of their sex or gender, which occurs with the purpose or effect of violating the dignity of such persons, and of creating an intimidating, hostile, degrading, humiliating or offensive environment referred to in Article 2 of Law 3896/2010 (GG A 107) and Article 2(2) of Law 4443/2016 (GG A 232). These forms of conduct include sexual harassment under Law 3896/2010, as well as forms of conduct related to the sexual orientation, expression, identity or gender characteristics of a person.
- **Discrimination** The term "discrimination" refers to the differential treatment of people resulting from prejudices or interests, any act of making unjustified distinctions between people based on the groups, classes, or other categories to which they belong or are perceived to belong. For example, people may be discriminated on the basis of sex, age, language, nationality, race or ethnicity, disability, religious beliefs or sexual orientation.

### 4.2 Scope – Determining the workplace

The above forms of conduct may take place throughout the Company's facilities nationwide, where employees provide their services, as well as in places where employees receive their remuneration, take a break to rest or eat, in personal hygiene spaces and care facilities, changing rooms or accommodations given to the Company's employees. Furthermore, this policy covers all kinds of commuting to and from work, other travel, trips, conferences, trainings, as well as social events and work-related activities or Company-related operations. Finally, this policy also applies to all kinds of Company-related communications, including via information and communication technologies (e.g. e-mails, zoom or team meetings, social media, etc.).

### 4.3 Core Principles

- **Zero Tolerance – Prevention.** Harassment, violence and discrimination are offensive behaviours which create a hostile work environment, cause serious dysfunction in the workplace, disrupt work peace and, in many cases, constitute unlawful and punishable conduct. DEPA COMMERCIAL S.A. shall not tolerate any form of violence or harassment or discriminatory treatment and behaviour. The use of any form of physical or verbal violence is unlawful and should be reported immediately. Any employees, regardless of their relationship to DEPA S.A., who feel that they have been harassed or treated unfairly should

report it, in order to have this situation remedied accordingly or treated under the provisions of this policy. Furthermore, all employees are encouraged to report and intervene, where possible, but without putting themselves at risk, whenever they witness any discrimination or harassment. All Heads of Departments are required to report any complaints brought to their attention, which fall within the scope of this policy, as well as any instances of harassment that they are told about or observe themselves.

- **Actions – Rights – Measures.** Any employee or third party associated in any way with DEPA COMMERCIAL S.A., who is involved in incidents of violence and harassment or prevents the reporting of such incidents, shall be subject to remedial and/or disciplinary measures, including but not limited to changing the working hours or shifts or place of work, initiating mandatory sessions for psychological support and enforcing disciplinary penalties.

DEPA COMMERCIAL S.A., whenever receiving a complaint about incidents of violence and harassment, shall conduct an immediate, thorough and objective investigation, in order to ensure the procedural propriety for all parties involved through the competent bodies to be appointed for this role. The confidentiality of the investigation shall be respected as far as possible and shall be disclosed only to the persons needed to conduct the investigation, thus ensuring that such investigation will be conducted effectively and in accordance with the principles and procedures of this policy. Once an incident of violence and harassment has been identified and confirmed, immediate remedial action shall be taken. Any remedial measures shall be subject to review in order to ensure that incidents of harassment continue to be dealt with effectively. All employees, including the coordinating managers, heads and other supervisory bodies, are required to cooperate with and fully assist in any internal investigation looking into harassment or discrimination incidents.

- **Immediate response – Assistance.** Any employee who has been subjected to violence, harassment or discrimination also reserves the right to take all available and possible administrative actions or judicial proceedings laid down by law. The Liaison Officer for the prevention of violence and harassment (see next) shall provide the details of any relevant public, administrative and/or judicial authorities from which the complainant may seek protection. In the event of a serious incident of harassment involving criminal penalties, the Management of DEPA COMMERCIAL S.A. shall submit a report to the competent Prosecutor upon recommendation of the Complaints Handling Committee.
- **Prohibition of retaliation.** Any person falling within the scope of this policy shall not suffer negative consequences for reporting an incident of violence, harassment or discrimination, or for providing information about such an incident or assisting in any way in the investigation of such a reported incident. The Company shall not tolerate any kind of vindictive or retaliatory behaviour against a person who has made a complaint or assisted in its investigation. Whoever is involved in retaliation shall be subject to the penalties laid down in DEPA's Internal Rules of Procedure, as duly amended. The Company also prohibits any employee or third party, whatever their association to the Company may be, to take retaliatory or intimidatory actions against another employee or third party, who opposes violence or any form of harassment, submits a complaint, gives testimony, assists or participates in the investigation procedure of an incident.

#### 4.4 Prohibited forms of conduct

- **Incidents.** Harassment prohibited under this policy includes, but is not limited to: Insulting someone on grounds of discrimination which is based on sex, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics/attributes and choices; threats, both verbal or gestural; insults in public or in private; belittling or ridiculing a person or their abilities, whether in privately or in the presence of third parties; threatening of or actual physical violence; persistent or unjustified criticism. Abusive, malicious, derogatory, obscene or derisive comments and the dissemination thereof, insinuations, sexist or racist “jokes” and comments, using offensive language, verbal sexual harassment or propositioning, insinuating that delivery of sexual favours are necessary for career progression or that the refusal to enter into a sexual relationship could negatively affect one's professional advancement in the Company, offering benefits (e.g. promotion or salary increase) in exchange for sexual favours or creating an environment that promotes “sexual contact” as a means of professional development in the workplace, the retaliation or threat of retaliation after rejection of sexual propositioning; cyberbullying, sending messages with annoying and offensive content by SMS, e-mail, social media, fax or letter, unjustifiably persistent and/or offensive questions about one's age, family status, personal life, sexual orientation, as well as similar questions on race or nationality, including cultural identity and religion. Also included are visual forms of harassment such as posters, cartoons, caricatures, photographs or drawings that are derogatory based on the characteristics protected by law. Physical unwanted contact such as touching, pinching, sexual gestures, hitting, grabbing, pushing and all kinds of physical violence. The violation of privacy, the intentional partial or total destruction of personal effects, vehicles or property, the interference to or obstruction of a person's regular work, movement and physical integrity, physical exclusion or confinement, sexual gestures, physical surveillance, stalking. These acts are all indicative and do not constitute an exhaustive list of prohibited acts.
- **Legitimate behaviours.** The following behaviours do not constitute instances of violence and harassment. The direct supervision of employees, including the setting of performance expectations. Taking steps to adjust performance, such as placing an employee in a performance improvement plan. The assignment of tasks and instruction on how and when such tasks should be performed. Requesting updates or task progress reports. The approval or justified refusal of requests for leave. Requesting documentation of absence on health grounds in accordance with the applicable legal provisions. The moral and/or financial reward for excellent employee performance. Providing constructive feedback on job performance.

#### 4.5 Assessment of the risks of violence and harassment at work

##### 4.5.1 Assessment of risk factors and their improvement

DEPA COMMERCIAL S.A. carries out studies in collaboration with all its departments on possible risk factors depending on the nature and subject matter of the work provided, with a view to assessing the existing working conditions and adjusting them in such a way as to reduce as far as possible the chances of an incident of violence and harassment in the workplace.

Some examples of risks are: high stress in the workplace, isolated or closed workplaces, job distribution, security of facilities and control thereof, lack of appropriate training, people with a history of violent behaviour, delivery of goods or services, working alone or in an isolated location, working late at night or in the morning hours, household or personal life issues brought in the workplace.

#### 4.5.2 Establishing a disciplinary framework for incidents of violence and harassment

The Company's disciplinary rules are hereby adjusted to clearly describe which behaviours shall not be tolerated and which ones constitute disciplinary offences, as well as to provide the corresponding disciplinary penalties that should be proportional to the disciplinary offences.

#### 4.5.3 Establishing a special procedure for receiving and investigating reports concerning incidents of violence and harassment

The competent reference person shall receive, investigate and handle any complaint or relevant report in a confidential manner respectful of human dignity and shall provide full support and assistance to the complainant. All employees have an obligation to maintain confidentiality when submitting evidence as part of an investigation. Commenting on confidential information and/or spreading rumours shall not be tolerated. All employees are protected from victimisation, adverse treatment and detrimental change in their working conditions because they contributed in any way (either by complaining or testifying) to the investigation of a harassment complaint in any form.

### **4.6 Measures to prevent, control, mitigate and combat risks, as well as to monitor such incidents or forms of conduct**

All employees and anyone associated in any way with DEPA COMMERCIAL S.A. should comply with this policy. This policy applies both in the workplace and wherever corporate meetings, conferences and work-related events are held, either at the Company's premises or elsewhere, by physical presence or on-line or by telephone.

DEPA COMMERCIAL S.A. ensures an approachable, safe and friendly work environment where the relations between employees, partners and Management are governed by mutual respect, kindness, honesty, understanding, trust, cooperation and support.

DEPA COMMERCIAL S.A., within the limits of its capabilities, takes all appropriate measures and makes all reasonable adjustments to work conditions in order to ensure the protection and support of employees who are victims of domestic violence. The Company also takes all available measures to inform and raise awareness among staff, by any means appropriate (e.g., print and electronic materials, etc.), in order to combat violence and harassment, ensuring that everyone is aware of the Company's policies and procedures concerning incidents of violence and harassment and knows where to turn to in the event of violence or harassment.

#### **4.7 Information on the rights of aggrieved persons**

DEPA COMMERCIAL S.A. states that in the event that a person is aggrieved by an incident of violence and harassment in access to employment, during the employment relationship or even if the contract or employment relationship in the context of which the incident or conduct is alleged to have occurred has expired, they have:

- 1) the right to judicial protection;
- 2) the right to appeal, submit a complaint and petition for grievance hearing with the Labour Inspectorate, within the framework of its legal responsibilities;
- 3) the right to file a report to the Greek Ombudsman, within the framework of the Ombudsman's legal responsibilities, as well as
- 4) the right to file a report within the Company in accordance with the complaints management policy.

The individual procedures for the submission, handling and internal investigation of reports include the detailed steps that any complainant must take, as well as the responsibilities of DEPA's bodies and the actions they need to take to ensure the effective management of relevant incidents. In any case, when a report or complaint of such behaviour arises within the Company, the aggrieved person retains all rights to appeal to any competent authority.

Any person who is subjected to violence and harassment shall have the right to leave the workplace for a reasonable period of time, without their wages being withheld or any other repercussions, where in their reasonable belief there is an imminent serious risk to their life, health or safety, in particular when the perpetrator of such conduct is a hierarchically senior person. In this case, the person leaving should inform the Company's Personnel Department in advance, reporting the incident of violence and harassment and the incidents that corroborate their belief that a serious risk to their life, health or safety is imminent.

#### **4.8 Information, awareness and support actions for staff**

DEPA COMMERCIAL S.A. hereby informs the staff and posts in a conspicuous place the contact details of the competent administrative authorities, to which any aggrieved person has the right to appeal (Labour Inspectorate, Ombudsman), and in particular informs about the Labour Inspectorate's complaint hotline (15512) and the citizens' service line at 1555 and <https://1555.gov.gr/>, as well as about the service of direct psychological support and counselling for women who are victims of gender-based violence and are able to communicate with the SOS 15900 Hotline (General Secretariat for Demographic and Family Policy and Gender Equality).

DEPA COMMERCIAL S.A., within the limits of its capabilities, takes all appropriate measures and makes all reasonable adjustments to work conditions in order to ensure the protection and the support of the employees who are victims of domestic violence. It also takes all necessary measures to inform and raise awareness among staff, using the above-mentioned appropriate means to combat violence and harassment, ensuring that everyone is aware of the Company's policy and procedures concerning incidents of violence and harassment and knows where to turn to in the event of violence or harassment, as well as the possibilities given to them by Law.

DEPA COMMERCIAL S.A. trains its executives in every appropriate way and means in order to identify discrimination, violence and harassment at work and to provide the necessary support to

its staff and partners, by organising seminars, publishing relevant brochures and regularly training staff on matters of violence and harassment. It also encourages the participation of employee representatives and management executives in training programmes and training seminars on the identification and management of potential risks of violence and harassment, as well as seminars by mental health specialists or counselling providers. The appropriate reference person for issues regarding violence and harassment shall ensure that staff receive appropriate awareness training on violence and harassment and shall make this policy known both inside and outside the Company.

## **5. Procedure for the submission, handling and internal investigation of reports**

DEPA COMMERCIAL S.A. encourages its employees and any third party associated in any way with the Company to report any incidents of discrimination, violence and harassment in the workplace, to which they are witnesses and is committed to treating with absolute confidentiality, discretion and impartiality the handling of all complaints. DEPA COMMERCIAL S.A. is committed to receiving, investigating and handling any relevant complaints, showing zero tolerance towards discrimination, violence and harassment, always by maintaining confidentiality and being respectful of human dignity. The Company also undertakes not to interfere with the receipt, investigation and handling of such complaints. This policy applies alongside the applicable legislation on the protection of the employee's personality and does not affect the employee's legal rights in civil and criminal law, as well as the rights to lodge a complaint before the competent government bodies.

### **5.1 Communication channels – Competent persons**

#### **5.1.1 Reference Person/ Liaison Officer**

By decision of the Company's Management, DEPA COMMERCIAL S.A. appoints one person (preferably a lawyer on a salaried assignment by the Company's Legal Service) to be a reference person ("Liaison Officer"), who will be in charge of guiding and informing employees on the prevention and dealing with violence and harassment at work. The role of the Liaison Officer is to supply information: i.e. to guide and inform employees, regardless of whether such guidance or information is sought out for an incident of violence and harassment or a related complaint.

#### **5.1.2 Complaints reviewing body**

Upon being authorised by the Board of Directors of DEPA COMMERCIAL S.A., the Complaints Handling Committee (the "Committee") has undertaken the handling of reports or complaints concerning violence or harassment made by the aggrieved persons. The Committee consists of three (3) members: the reference person (Liaison Officer) as the Chairman, a member of the Workers' Union Board, and an executive from the Human Resources Function, who is appointed by decision of the Company's Management. The Committee shall be appointed for a period of three years. After the end of their term, the members of the Committee may be reappointed. The Board of the Workers' Union shall inform Management of the member who will participate in the Committee. It is the obligation of the above persons and committees to protect Personal Identifiable Data (PID), which may come to their knowledge in the exercise of their roles.



## 5.2 Investigation and review of complaints

Complaints about conduct that constitutes a violation of this policy shall be made in writing to the above appointed Committee, by name, and shall be investigated promptly, thoroughly and impartially, while ensuring the protection of confidentiality and personal data of both the victims and the complainees. Complaints submitted by telephone to the dedicated helpline are also accepted upon review. The persons who have filed reports shall be informed of the receipt status of such reports and about the progress of the review at regular intervals. In order to maintain safety at the workplace and the integrity of the investigations, the Company may, *inter alia*, move workers or change their working hours, pending the outcome of the investigation. During this period, access to buildings and/or facilities may be recalled, in part or in whole. As regards the burden of proof, the provision of Article 15 of Law 4808/2021 shall apply (the complainees bears the burden of proving that there has been no violation). Upon completion of the investigation, the Company will communicate the results of the investigation as soon as this is practicable and appropriate. The steps of filing a report/complaint are described next.

### Step 1: Methods of filing a complain – Establishing trust

DEPA COMMERCIAL S.A. has established a procedure and makes available to the complainant alternative ways of submitting their report/complaint by name:

- by mail to: 92 Marinou Antipa Ave, Heraklion Attikis, P.C.: 14121 - attention of "Chairman of the Complaints Handling Committee/Liaison Officer";
- by e-mail to the dedicated Company address at ([trust@depa.gr](mailto:trust@depa.gr)), which is accessible only by the Liaison Officer; or
- by phone on the dedicated helpline calling the Liaison Officer at: (+30) 210 2701 099 (ext 099), (every day 9:00 – 17:00).

### Step 2: Classification of conduct and first response

The Liaison Officer collects and evaluates the complaint and then documents and classified it based on its form/type (harassment, bullying, etc.). Then the Liaison Officer contacts the complainant. The complainant is asked how they wish to initiate the incident handling process, and is given assurances about discretion and confidentiality and for the incident handling options.

The incident handling options are:

I. Procedure before the Liaison Officer (invitation and hearing of the parties involved). The incident ends with the mediation of the Liaison Officer and compromise of the parties (handling within five working days of being documented). This is followed by a written report informing the Committee of the incident and its development.

II. Procedure before the Complaints Handling Committee: If the issue is not resolved by the Liaison Officer, then the matter is discussed in meetings of the Complaints Handling Committee (handling within three weeks of being documented). Meetings may be convened (jointly or individually) by the parties involved in order to resolve the dispute through mediation by the Committee and the conciliation of the parties.

III. Proposal by the Complaints Committee: If the incident is not resolved in any of the above methods, the Complaints Handling Committee, by means of a written reasoned report detailing

the incident and the subsequent actions, proposes to the Company's Management either to adopt an "implementing decision" about the necessary, appropriate and proportionate measures to be taken, as the case may be, against the complainee, in order to prevent and not repeat a similar incident or behaviour, or to close the procedure and archive the case.

#### Step 3: Implementing decision

In this case, the Company's Management takes measures and imposes disciplinary penalties. In any case, the applicable provisions of the Labour Regulations and the Code of Conduct, as well as the current legislation in general, have a lasting effect, for which the parties involved will be kept informed.

#### Step 4: Transmission of a proposal and decision

The proposal of the Complaints Handling Committee and the Management's implementing decision are forwarded by the Complaints Handling Committee to the parties involved.

#### Step 5: Revising – reviewing the procedure

After the end of the calendar year, a report (general and anonymised, no references to personal data) shall be drawn up on the incidents and the type of incidents handled by the Committee. Actions shall be proposed to inform and raise awareness among employees in various ways.

### **5.3 Prohibition of retaliation against aggrieved persons**

If any employee or third party associated in any way with the Company considers that they have suffered retaliatory behaviours or further victimisation due to their filing a complaint or assisting in the investigation process of incidents of discrimination, violence and/or harassment, they must follow the above procedure to report such incident of retaliation.

### **5.4 Description of the effects of finding violations**

If the result of the investigation shows that there has been an incident of discrimination, violence or harassment or retaliation, DEPA COMMERCIAL S.A. shall take appropriate corrective, disciplinary and/or other actions against the violating party. Such actions may include:

- 1) a recommendation for compliance;
- 2) a written reprimand;
- 3) changing the position, working hours, workplace or working methods;
- 4) imposing a fine of up to ¼ of a day's salary or up to ¼ of 1/25 of a month's salary per offence;
- 5) compulsory leave from work (temporary dismissal) up to a maximum of thirty (30) days for each calendar year. Compulsory leave from work due to temporary dismissal entails the non-payment of a salary during the period of leave and the Company's right to prohibit the complainee from entering the workplace during the same period,
- 6) termination of the employment or cooperation, without prejudice to the prohibition of abuse of rights under Article 281 of the Civil Code. The termination of the employment contract is invalid if it constitutes vindictive behaviour or a countermeasure within the meaning of Article 14 of Law 3896/2010 (GG A 207) against an incident of violence and harassment.

Complaints that are proven to be blatantly malicious will be considered inadmissible and will be further investigated at the discretion of the Company, both as to the motives and as to those involved, in order to restore order by any legal means.

#### **5.5 Cooperation with the competent authorities**

DEPA COMMERCIAL S.A., as well as any person or department in charge of receiving and handling such complaints at company level, shall cooperate with any competent public, administrative or judicial authority which, either *ex officio* or upon request by an aggrieved person, within the framework of their competence, request the provision of data or information and undertake to provide assistance and access to the data. To this end, any data collected, in any form, is kept in a relevant file in compliance with the provisions of Law 4624/2019 (GG A 137) on "Personal Data Protection Authority, measures for the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data".