

**Policy of prevention  
and combating violence and  
and Harassment at Workplace**



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## **Policy of prevention and combating violence and and Harassment at Workplace**

The Lino Group, in compliance with the provisions of Part II of Law No. 4808/2021 for 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, Lino has adopted the following policy for the prevention and response to violence and harassment at work. At the same time, it incorporates in the Lino Group's policy the management of internal complaints about incidents of violence and harassment.



## PURPOSE

Lino Group companies respect 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 purpose of the policy is to create and establish 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. to prevent, address and eliminate all forms of violence and harassment that occur in the course of work, whether related to or arising from work.
- ii. to promptly identify instances of harassment and/or oppression by verifying incidents using effective complaint reporting methods,
- iii. communicating to all managers, employees, external partners, customers and third parties in direct contact with the company that any form of harassment and violence are phenomena unacceptable in the Lino Group.

## 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 Lino Group companies has ended, as well as prospective employees and other persons dealing or cooperating with the Group.

## ASSESSMENT OF RISKS OF VIOLENCE AND HARASSMENT AT WORK – DEFINITIONS

- 'violence and harassment' means any form of conduct, acts, practices or threats thereof, which is intended to, does or may result in physical, sexual psychological, or economic harm, whether occurring in isolation or repeatedly,
- '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
- "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 their dissemination, insinuations, 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 refusing 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 ethnicity, 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 are treated as acts of violence and harassment and retaliation and acts of retaliation or intimidation against another employee or a third party who opposes violence or any form of harassment, files a complaint, testifies, assists or participates in any process of investigating an incident against the complainant and further victimizing 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

- Lino Group, in the context of its general policy for the prevention and response to incidents of violence and harassment at work, takes the following actions:
- Inform and train staff using the most appropriate means available in each case, in order to ensure that all staff are aware of this policy and the procedures provided for in it, as well as the possibilities given 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 by e-mail to the staff's professional e-mail addresses the details of the competent administrative authorities to which any affected person has the right to appeal (Labour Inspectorate) and in particular the SEPE complaints hotline (15512) and the 1555 citizens' helpline and the e-mail address <https://1555.gov.gr/>, as well as the direct psychological support and counselling service, which is available to all staff.
- 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 phenomena, designating a specific person as a reference person ("liaison") within the company, responsible for guiding and informing employees on the prevention and response to violence and harassment, as well as for handling complaints. Included within these procedures is provision for disciplinary action to be taken against anyone found to have to have engaged in any form of harassment or violence, as well as to anyone who was complicit in such actions or who knew and deliberately concealed such actions.
  - It expressly prohibits retaliation against the complainant and further victimisation of the person complained against.

- Commit that complaints and harassment proceedings will be treated confidentially and will be handled impartially.

## PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS

Any employee of the Lino Group or a third party related in any way to him/her who 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 make a report/complaint as set out below.

Any employee of the Lino Group or a third party connected in any way with the employee who believes that he or she has been subjected to discrimination, violence or any form of harassment, or if he or 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 incident management of dealing with incidents of violence and harassment at work shall be the respective Corporate Social Responsibility Officer and Human Resources Manager of the Lino Group.

All queries relating to the execution or interpretation of this policy to the reporting person, who is responsible and manages all matters relating to the 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 follows.

Complaints about conduct in breach of this policy shall be accepted in writing, either anonymously or anonymously, at the dedicated e-mail address [hr@krv.gr](mailto:hr@krv.gr), to which only the reporting person shall have access.

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 shall collect and assess the complaint, recording and characterising it. The reporting person, if the complaint has been made anonymously, shall then contact the complainant, inform him/her of the following options for managing the incident and ask 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 investigation.

To avoid worsening the position of the complainant, and to ensure the integrity of the investigation, the reporting person should recommend to the management of the company to take all necessary measures, such as the transfer of employees or the modification of their working hours or the way in which they work (e.g. teleworking) modify their working hours until the investigation is completed.



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

- o Mediation of the reporting person and reaching a settlement through an invited discussion and a 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 reporting person shall prepare a report on the incident and its development and inform the CEO of the company.

- o 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 prepare a relevant report with the findings of his/her investigation, with a simultaneous characterization 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 on the imposition of disciplinary sanctions against the complainant, depending on the gravity of the incident, which may include, but are not limited to:

- an oral or written reprimand or recommendation for compliance
- a change of position, hours, place or manner of performing the work
- termination of the employment contract or cooperation agreement

Complaints which are shown to be manifestly unfounded or malicious will be filed as inadmissible, and in the event that the management of the company deems it necessary, will be further investigated in order to restore order and to avoid distorting the objectives pursued herein.

This policy and the above procedure shall be applied in parallel and complementary to the general legislation in force to protect the employee's personality and shall 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, the Lino Group undertakes to cooperate with the Competent Authorities and to provide any relevant information upon request.

More generally, the Lino Group and the reference person appointed by it 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, within the scope of its competence, the provision of data or information 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 reference to 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 information actions of posting them in the workplace, on the notice board and on the company's website, while informing employees and their representatives 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.