

POLICY

FOR COMBATTING VIOLENCE AND HARASSMENT IN THE WORKPLACE

& HANDLING RELATED INTERNAL COMPLAINTS



What is the purpose of the Policy?

The BODOSSAKI FOUNDATION (hereinafter the '**Foundation**') affirms its zero tolerance of incidents of violence and harassment at work.

The purpose of this Policy is to ensure a safe working environment for all persons employed by the Foundation, by preventing and responding effectively to incidents of violence and harassment at work, in compliance with the provisions of Articles 9 and 10 of Law 4808/2021 (Government Gazette 101/A/19.06.2021), which ratified Convention 190/21.06.2021 of the International Labour Organisation concerning the elimination of violence and harassment in the workplace, as codified in Articles 64 and 65 of the Presidential Decree 80/2022 (Government Gazette 222/A/04.12.2022).

How are incidents of violence and harassment in the workplace defined?

Violence and Harassment: Refer to forms of behaviour, acts, practices or threats thereof aimed at, leading to, or likely to lead to, physical, mental, sexual or economic harm, whether occurring as isolated incidents or repeatedly.

Physical Violence: Refers to any attempt to physical assault another person or group of persons, and/or the infliction of bodily harm, and/or damage to objects or property.

Harassment / Mantal Violence: Refers to forms of behaviour that have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment on the basis of gender.

Gender-based Harassment: Refers to forms of behaviour related to a person's gender, which aim at or result in violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of behaviour include sexual harassment under Law 3896/2010, as well as forms of behaviour related to a person's sexual orientation, expression, identity or gender characteristics.

Sexual Harassment: Refers to the display of any form of unwanted verbal, non-verbal, or physical behavior of a sexual nature, with the intent or effect of offending a person's dignity, particularly by creating an intimidating, hostile, degrading, humiliating, or offensive environment. A single incident of this nature is sufficient



to constitute sexual harassment if it offends the individual's dignity and creates an adverse environment. Such inappropriate behaviour includes not only direct actions but also those carried out through social networks/online.

Sexual harassment as unethical behaviour: Refers to sexual harassment to the point where an employee's rejection or disapproval of the conduct in question is used as a criterion for a decision that affects at work the person subjected to sexual harassment.

Harassment in the workplace: Refers to social interactions where one (or more) individuals aim to place another individual in a position of weakness through a series of unethical behaviours which, while seemingly unrelated, are part of a strategy to intimidate the targeted individual. The employee is subjected to mental harassment/bullying, with or without the use of social media, through continuous criticism and undermining, aggressive - obscene language, social exclusion and isolation, spreading rumours and humiliation, hostile behavior, spying - stalking, unjustified assignment of tasks detrimental to the individual, etc. What differentiates harassment in the workplace from other stress factors is that it is a systematic, long-term, and 'covert' tactic aimed at the mental and occupational destruction of the targeted individual. Aggression can be expressed both verbally and non-verbally.

Domestic Violence: Refers to all acts of physical, sexual, psychological or economic violence that take place within the context of family relationships, regardless of biological or legal family ties, or between former or current spouses or partners, regardless of whether the perpetrator shares or has previously shared the same residence with the victim.

What is the scope of the Policy?

1. This Policy applies to all individuals working for or engaged by the Foundation, regardless of their contractual status, including those employed under permanent or fixed-term contracts, on probation, under contract for particular services, freelance agreements, contracts of mandate, persons employed through third-party service providers, suppliers, contractors and subcontractors and their personnel, as well as persons undergoing training, including interns and apprentices, volunteers, pro bono workers, former employees, and job applicants.
2. For the purposes of this Policy, instances of violence and harassment may be directed against, or perpetrated by, any of the persons referred to in paragraph 1 of this article, as well as by third parties, and must



occur in the context of the individual's work or related activities,
particularly:

(a) in the workplace, including all areas where the individual performs their work, receives remuneration, takes breaks (including for rest or meals), or uses hygiene and care facilities, changing rooms or accommodation provided by the Foundation;

(b) travel to and from work, other work-related travel, training, events, and social activities connected with work;

(c) in work-related communications, including those conducted through information and communication technologies.

Assessment of the Risks of Violence & Harassment

Forms of employee harassment:

- malicious comments relating to an individual's personality, manner of expression and behaviour, habits and opinions,
- disclosure of personal information, spreading false rumours, defamation,
- ridicule or contempt,
- attacks with raised voices or insulting comments,
- manipulative tactics,
- non-verbal bullying messages,
- regularly assigning tasks that do not match their qualifications,
- frequent changes of task without adequate time for training or experience;
- withholding information necessary for performance of their duties,
- undervaluing of abilities with constant daily concentration on mistakes and weaknesses,
- creating rules that apply only to the targeted person,
- excessive monitoring or exposure to adverse conditions (e.g. smoking, loud music, etc.),
- deliberate strategies to isolate them,
- systematically ignoring suggestions as if the person were absent,



- prohibiting communication with others,
- exclusion from meetings, seminars, or social events,
- refusal to grant leave without any genuine work-related justification,
- inventing conditions that deter the assertion of employment rights,
- threats of punishment for filing complaints with management,
- intentional falsification of performance reviews to suggest negative assessment,
- Intimidation through violent actions (e.g. loud banging of hands on tables, doors slammed in faces).

The following **do not** constitute harassment or unequal treatment:

- Applying performance criteria set by the Foundation,
- Reasonable deadlines for project completion,
- Constructive feedback on results of the employee's work,
- Regular performance reviews,
- Notifying staff of unsatisfactory performance, provided it is a fair assessment and adequate resources and information have been provided for the employee to carry out their duties,
- Reprimands for inappropriate or unethical behaviour,
- Changes in duties & responsibilities, providing the essential terms of the original employment remain unchanged,
- Direct supervision, including setting performance expectations,
- Implementing performance improvement plans,
- Assigning tasks and providing guidance on their execution,
- Requesting updates or progress reports,
- Justified approval or denial of leave,
- Requesting medical documentation for health-related absences as per regulations,
- Moral or financial reward for exceptional employee performance,
- Providing constructive performance-related feedback.

Forms of sexual harassment may include:

- any physical contact without the consent of both parties (e.g. touching, grabbing, hugging),



- requests for sexual favours, accompanied by implicit or explicit threats regarding job performance evaluation, promotion or other employment benefits,
- subtle or overt pressure for unwanted sexual activity,
- unwanted romantic or inappropriate proposals or pressure for sexual contact,
- persistent invitations for social activity outside work despite clear lack of interest,
- inappropriate flirting,
- obscene remarks or innuendos,
- sexually suggestive gestures, expressions, comments, or jokes,
- gender-based stereotypes or behaviours,
- display or distribution of sexual material (images, posters, calendars, graffiti, reading material, promotional items, etc.),
- obscene, offensive or unsolicited online communication, emails, or phone calls.

Employee Awareness – Rights & Obligations

Each individual subject to this Policy **is entitled:**

- to be treated with respect and courtesy,
- not to be subjected to violent behaviour, harassment (including sexual and gender-based violence), discrimination, or intimidation,
- to report any incident of unethical behaviour in the workplace (as defined in this Policy), without fear of retaliation or adverse consequences.

Each individual subject to this Policy **is obliged:**

- to comply with this policy and all applicable procedures for the protection of themselves and others employed by the Foundation,
- to participate in the Foundation's training and awareness programmes relating to violence and harassment,
- to immediately report any incident of violence or harassment to the designated 'contact person',
- to cooperate with the investigation of any complaint submitted in



accordance with the procedure set out below,

- to correct their own behaviour if they perceive that it is causing offence or discomfort to others (colleagues, partners, etc.),
- not to feel ashamed or blame themselves for the conduct of the perpetrator,
- to respond to violent or harassing behaviour calmly and decisively,
- to act in good faith and refrain from submitting false, inaccurate, or defamatory complaints.

Obligations of Managers & Supervisors

For the purposes of this Policy, individuals who head departments or directorates in the Foundation should:

- lead by example through exemplary conduct in the exercise of their duties,
- consistently promote this policy among their teams,
- actively participate in training sessions, awareness-raising talks, and campaigns organised by the Foundation,
- be alert for signs of violence or harassment by observing changes in employee behaviour or performance changes and seeking feedback,
- intervene before violence or harassment escalates, offering immediate support and monitoring the working environment,
- demonstrate effective skills in conflict resolution,
- encourage team members to report incidents of violence and harassment, and respond promptly, respectfully and empathetically,
- immediately inform the designated 'contact person' upon learning of any incident or allegation of violence or harassment.

Obligations of the Foundation

In relation to incidents of violence and harassment, the Foundation undertakes:

- to receive, investigate, and manage all complaints or reports with zero tolerance, complete confidentiality, and full respect for human dignity, without obstructing the process,



- to provide assistance and access to any competent public, administrative or judicial authority during the investigation of such incidents, upon request,
- to inform all persons subject to this Policy of potential risks of violence and harassment at work and the related prevention and protection measures, including the rights and responsibilities of employees and the Foundation in relation to such incidents.

Measures to Prevent, Monitor Control and Limit the Risks of Violence and Harassment in the Workplace

To prevent incidents of workplace violence and harassment, the Foundation shall:

- provide information on potential risks through informative leaflets, emails, etc.;
- provide appropriate training at regular intervals in order to offer guidance and raise awareness regarding forms of violence and harassment in the workplace;
- gather the views of persons subject to this Policy anonymously through questionnaires in order to assess working conditions and collect suggestions or observations;
- designate a 'contact person', tasked with providing ongoing advice and information regarding violence and harassment in the workplace.

Measures for Addressing Incidents of Violence and Harassment in the Workplace

- **In the event of** an incident or behaviour constituting violence or harassment in the workplace, the aggrieved individual may submit a verbal or written complaint to the 'contact person'. Complaints may be made in person, via email to the designated email address, or by telephone. Alternatively, they may use the communication channels set out in the Foundation's [Whistleblowing Policy](#).
- The contact person will promptly forward the complaint to the **Ethics Committee established under the Foundation's Code of Professional Conduct** (hereinafter referred to as the '**Committee**'). The Committee is responsible for assessing both named and anonymous complaints, advising the competent Executive Committee on their credibility and



whether further investigation is warranted, conducting inquiries, and submitting a written report to the Executive Committee.

Members of the Ethics Committee are (ex officio):

- The current Advisor to the Property and Financial Management Directorate;
- The current Head of the Legal Department;
- The current Head of the Foundation's Administrative Support / Secretariat.

The alternate Committee member is the current Head of Digital Infrastructure Transformation, who shall replace any other Committee member in cases of conflict of interest, perceived bias, or inability to deal with the incident in question.

- The Committee conducts a thorough investigation of every credible complaint, gathering all necessary evidence related to the matter. Specifically, it may interview the parties involved (complainant and accused), examine witnesses, request relevant documents that may exist and could help determine whether an incident of violence or harassment occurred, and liaise with heads of departments and directorates of the Foundation. Once the investigation is complete, the Committee submits a written report to the competent Executive Committee of the Foundation, which then arrives at a reasoned decision regarding the complaint. The decision, along with the Committee's findings, is communicated to both complainant and accused to ensure they are informed of it. The investigation should be completed, and the findings submitted and communicated to the Executive Committee as promptly as possible, and generally no later than three (3) weeks from the date the complaint was filed. The competent Executive Committee may request further investigation by the Committee or decide to take investigative action itself.
- If the incident is substantiated, the Executive Committee shall take all necessary, appropriate, and proportionate measures, which may include, but are not limited to:
 - issuing a compliance notice to the employee concerned;
 - changing their role, working hours, location, or manner in which work is assigned;



-terminating their contract of employment, collaboration, service or supply with the Foundation.

- The investigation and resolution of complaints is governed by the following principles:

-Prohibition of retaliation or further victimisation: All complaints, regardless of form, shall be investigated without reprisals against the complainant or witnesses. Any retaliatory termination or adverse treatment is prohibited and void.

-Confidentiality: All parties involved must maintain strict confidentiality.

-Anonymity: Anonymous complaints may prompt personal or telephone contact if required, but the anonymity of the complainant must be respected if desired.

-Impartiality: The investigating body must act impartially and with a clear sense of duty. If this is not possible, the Executive Committee shall take appropriate action.

-Data Protection: The personal data of all parties involved shall be protected to the greatest extent possible, in line with national and EU legislation.

- If the aggrieved individual has also submitted the complaint to any administrative or judicial authority, the Foundation shall provide all necessary assistance and relevant information to the authorities concerned.
- In cases requiring the intervention of the police or any other authority, the Foundation's Legal Department shall oversee such actions.
- From the moment the incident is reported, the Foundation shall ensure, where appropriate, that the victim receives psychological and moral support, assistance, and reintegration services.
- The Foundation reserves the right not to follow the procedure outlined above if the complaint or allegation is deemed to exceed the limits set by principles of good faith and decency or is clearly unfounded.

Legal Rights of Aggrieved Persons



Any person who has been subjected to violence or harassment shall have the right, in addition to submitting a complaint:

- to exercise any legal right available to them by initiating the appropriate legal proceedings and remedies, as applicable;
- to report the incident to the Hellenic Labour Inspectorate (SEPE): <https://www.hli.gov.gr/epikoinonia>, Complaints Hotline: 1555;
- to contact the Greek Ombudsman: 17 Halkokondyli Street, 10432 Athens, E-mail: press@synigoros.gr, Tel.: (+30) 213 1306 600;
- to contact the Emergency Psychological Support and Counselling Service for women victims of gender-based violence: SOS Line 15900;
- to request a change in work location and/or working hours for a necessary period, provided the harassment has been substantiated, and, despite the implementation of recommendations, warnings, or disciplinary measures, the harassment continues;
- to refrain from attending work for a reasonable period, without any impact on the employment relationship or salary, if they reasonably believe there is a serious threat to their life, health, or safety – particularly where adequate protective measures have not been taken, or are inadequate to prevent the behaviour in question. In such cases, the individual must inform the Foundation in advance and in writing, detailing the incident and offering supporting evidence demonstrating the risk to their life, health, or safety;
- to seek full compensation before a Court of Law for any loss or damage incurred.

Special Care for Victims of Domestic Violence

The Foundation is committed to safeguarding the employment and providing comprehensive support to individuals who are victims of domestic violence. In order to manifest its commitment, the Foundation may take the following actions, among others:

- modify the individual's role, working hours, or place of work;
- adjust the method of work and offer access to flexible working arrangements;
- provide moral and psychological support services;
- assist with facilitating communication and access to supportive structures.



Contact Person

The contact person ('Liaison') within the Foundation, responsible for guiding and informing employees about the prevention and handling of workplace violence and harassment, as well as for receiving verbal and/or written complaints, is the current head of Administrative Support/Secretariat.

At the time of this Policy entering into force, the designated contact person ('Liaison') is Ms Ismini Fragkioudaki, E-mail: ifragkioudaki@bodossaki.gr, Tel.: +30 210 3317263

The alternate contact person ('Liaison') shall be the current head of Digital Infrastructure Transformation. This person shall act in place of the designated contact person ('Liaison') in cases of any conflict of interest, impediment, perceived bias, or any other reason that prevents the primary contact person from handling the matter. At the time of this Policy entering into force, the alternate contact person ('Liaison') is Ms Niki Manta, E-mail: nmanta@bodossaki.gr, Tel.: +30 210 0107765

Policy Review

This Policy was approved during the 611th meeting of the Foundation's Board of Trustees held on 21 March 2025 and is subject to ongoing evaluation regarding the effectiveness of its implementation. The Foundation reserves the right to amend or supplement its content in accordance with the applicable legal framework and subject to the conditions set forth by the relevant legislation.

This Policy shall enter into force on the date it is signed by the President of the Board of Trustees of the Foundation. It shall be published on the Foundation's website in both Greek and English. In the event of any inconsistency or contradiction between the Greek and English versions of the Policy, the Greek version shall prevail.

Athens, 21 March 2025
The President of the Board of Trustees
Athina Dessypri