

ANTI – WORKPLACE HARASSMENT AND VIOLENCE K POLICY

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1. PURPOSE/ZERO TOLERANCE STATEMENT

By means of this policy, the Hellenic Corporation of Assets and Participations S.A. (Growthfund or the Company) aims to prevent and combat all forms of violence and harassment occurring in the course of work, whether related to or arising from it. Having set the development of a free expression culture at the workplace as a top priority, Growthfund encourages the immediate reaction to and reporting of any reprehensible conduct related to violence and harassment at the workplace.

Specifically, Growthfund commits to adopt and strengthen prevention and repression mechanisms, as well as procedures aimed at tackling and eliminating incidents of violence and harassment at work.

With a view to creating a working environment where respect for human dignity prevails, it states expressly and unequivocally that all forms of violence and harassment in the course of work, whether related to or resulting from it, are prohibited, including gender-based and religious violence and harassment as well as sexual harassment. It further undertakes to prevent the victimization of any person who has been harassed or subjected to violence, and abstain from any action, which may be characterized as “retaliation” or “reprisal”.

In addition to the above commitments, the Company expressly states that it shall assist any public administrative or judicial authority, during the investigation of any violence and harassment incident conducted in the Company.

2. SCOPE

This policy applies to all the employees of the Company, regardless of their employment relationship, and in particular the management, employees with a contract of employment, service provision, paid or unpaid mandate, works, independent services and temporary employment, including trainees and apprentices, as well as third company employees, who provide their services to or do business with the Company.

The policy applies to the workplaces of the Company and its subsidiaries, including public and private areas, places where remote work is provided, as well as venues where corporate events, meetings, conferences, etc. are held.

3. HARASSMENT AND REPREHENSIBLE CONDUCT

“Violence and harassment” means forms of conduct, acts, practices or threats, which aim, lead or may to lead to physical, psychological, sexual or financial harm, whether they occur once or repeatedly. This includes, but is not limited to, forms of conduct which have the purpose or effect of violating the dignity of the person and creating an intimidating, hostile or offensive environment, regardless of whether they constitute a form of discrimination.

“Gender-based harassment” means forms of conduct based on a person's gender, which have the purpose or effect of violating their personality and creating an intimidating, hostile, degrading, humiliating or aggressive environment. The above forms of conduct include sexual harassment under Law 3896/2010, as well as forms of conduct related to sexual orientation, expression, gender identity or characteristics of the person.

“Reprehensible conduct” related to incidents of violence and harassment means dangerous, unethical or illegal practices occurring in the workplace under the responsibility of the employer or in the context of the Company's activities, which include but are not limited to mobbing, bullying, threats, extortion, insulting, defamation, discrimination which may be based on gender, sexual orientation, color, age, ethnicity, religious and/or political beliefs, marital status of the person.

4. MEASURES TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT – EMPLOYEE INFORMATION AND AWARENESS-RAISING

In particular, the Company's Compliance Department shall operate as a competent internal control function for incidents of violence and harassment at work in cooperation with the Human Resources Department.

The responsibilities of the control function shall include, not be limited to: a) monitoring the policy implementation and informing employees; b) evaluating the policy effectiveness; c) making recommendations to any official authority regarding measures it deems necessary to improve and enhance the protection of victims of violence and harassment at the workplace; d) investigating reports and/or complaints of violence and harassment incidents; e) promoting measures for the protection of the victim(s); and g) recommending repressive measures.

Complaints and reports of violence and harassment shall be accepted, whether openly or anonymously, always in accordance with the Company's Whistleblowing Policy, and shall be investigated promptly and thoroughly. Following a report of an incident or a complaint by an employee of the Company, with a view to safeguarding a healthy working environment, the Company may take the necessary and appropriate protection measures in order to ensure that such incident or conduct may not be repeated in the future.

Such measures may include, but not be limited to: compliance recommendation; change of position, working hours, place or manner of employment; termination of the employment contract of the employee who has engaged in violent or harassing conduct or of the business relationship. The Company may, at its discretion, take any of the above-mentioned measures or any other.

In any case, the affected persons may request judicial protection as well as directly appeal to the Labour Inspectorate and make a report to the Ombudsman, as agencies responsible for resolution of disputes arising from violence and harassment at work. It shall also be possible to contact the Labour Inspectorate complaints hotline, as well as the helpline for direct psychological support and counselling for women victims of gender-based violence.

5. WORKPLACE VIOLENCE AND HARASSMENT RISK ASSESSMENT REPORT

The potential risks of workplace violence and harassment shall be identified in a uniform manner, assessing the risk or potential risk of violence and harassment and establishing a relevant prevention strategy to mitigate the actual or potential risks that may arise from the employment conditions, third parties, as well as from abuse of power at the workplace.

The relevant workplace violence and harassment risk assessment report shall be prepared and updated at regular intervals by the Company's competent officer/team in cooperation with the HR department. Employees shall be informed of the risks that may occur at work, such as the risks of violence and harassment, including sexual harassment, and how to prevent them.

6. MEASURES FOR EMPLOYEES - VICTIMS OF DOMESTIC VIOLENCE

The Company is committed to assisting any employee who has suffered domestic violence by supporting them in any reasonable manner and by any appropriate means, including but not limited to (a) by implementing flexible working arrangements at the request of the employee (e.g. remote work where this is allowed by the nature of the work provided, etc.); (b) by reinforcing safety measures at the workplace; and (c) by providing psychological support.

7. CONFIDENTIALITY AND PRIVACY

The process of reporting violence and harassment incidents shall be subject to strict terms of confidentiality, secrecy of both the complainant and the respondent, and protection from retaliation. Furthermore, absolute secrecy shall be maintained with regard to the content of the report, as well as any information that could lead to the identification of the person against whom a report or complaint is made, in accordance with the provisions of the Company's relevant policy.

The manner in which protection of the information and access of the person responsible for the examination of the reported incident of workplace violence and harassment shall be ensured is detailed in the Company's Whistleblowing Procedure.

8. REPORTING VIOLENCE AND HARASSMENT INCIDENTS – COMMUNICATION

Any interested party who is subject to the scope of this Policy may report a violence and harassment incident that has come to their knowledge using one of the channels below. Reports may be:

- a. filed to the whistleblowing platform via an email to <https://safevoice.growthfund.gr/#/> or

- b. sent to the e-mail address of the Company safevoice@growthfund.gr or
- c. sent by post to the Company's address, namely [Hellenic Corporation of Assets and Participations S.A., 4 Karageorgi Servias Street, PC 10562- 4th floor], to the attention of the Compliance Officer, with the designation "Confidential"
- d. submitted in writing or orally directly to the Compliance Officer.

The aforementioned communication channels serve as reporting lines and are available 24/7.

9. MISCELLANEOUS

This Policy shall enter into force, be amended and repealed in accordance with the provisions of Law 4808/2021 and the Company's internal procedures. The full text shall be sent to the employees by e-mail and be permanently posted at an accessible and visible location at the Company's facilities as well as on the Company's intranet. Every employee may duly express his/her views. Finally, any employee may, upon request, receive a copy of the Policy.