

**MANUAL
AGAINST**

**SEXUAL
HARASSMENT
AND VIOLENCE
IN THE WORKPLACE**

Created for Growthfund
with the expert advice
of Women on Top



WHY ARE WE DISCUSSING SEXUAL HARASSMENT AND VIOLENCE IN THE WORKPLACE?

Sexual harassment and violence in the workplace are unlawful acts and can have extremely negative effects, not only on the people who suffer from them, but also on those who witness such behaviours, their teams, businesses and the wider society.

Recipients of such behaviours are much more likely to experience physical and mental problems as a result of the great pressure they are imposed to. They are also much more likely to quit their jobs or no longer be able to perform well. Similar manifestations of anxiety and frustration often appear among people who have witnessed such incidents, while the teams in which these incidents occur find it difficult to work collectively and to communicate.

All these effects have an impact on productivity, proper operation and the image of a business and they also affect the economy, trust and cohesion of the whole society.

For all these reasons, preventing and tackling sexual harassment and violence in the workplace is a matter that concerns us all, if we want to work and thrive in a safe professional environment.



**Growthfund
demonstrates
Zero
Tolerance
to sexual
harassment
and violence.**

WHAT IS SEXUAL HARASSMENT - AND WHAT IT IS NOT?

Sexual harassment is any type of unwanted conduct, of a sexual nature, which has the purpose or effect of violating a person's dignity, especially if it creates a threatening, degrading, humiliating or offensive work environment.

What does this practically mean?

- **THAT** a way of conduct may constitute sexual harassment even if this was not the purpose or intention of the person who committed it.
- **THAT** sexual harassment is not always coercive. It may include sexual acts that create a hostile environment.
- **THAT** a way of conduct may be sexually harassing not only to the person it is directed at, but also to other people who work in the same environment.

Sexual harassment can be:

- **NOT ONLY** a persistent sexual proposition, but also comments, jokes or questions.
- **NOT ONLY** only unwanted invitations, but also persistent staring or leering of a sexual nature or vulgar gestures.
- **NOT ONLY** a sexual assault, but also unwanted physical touching or caressing.
- **NOT ONLY** in person, but also via the internet and online in general.
- **NOT ONLY** a problem of female, but also of male employees.
- **NOT ONLY** something committed by men, but also behaviours committed by women.

REMEMBER:

sexual harassment does not always come from hierarchically superiors, but can also come from colleagues, customers or suppliers. In addition, it does not necessarily occur in a specific workplace context, i.e. in the office or factory, it can occur anywhere we perform our work: on the road, at a business dinner, on a trip or while working from home.

What is **not considered sexual harassment?**

- Consensual flirting or romantic relationships between adults.
- An unfortunate comment that was never repeated after we clarified or expressed that it was unwelcome.
- Demeaning comments about the abilities or specificities of a woman or a LGBTQI+ person (such behaviours are called “gender harassment” and are, of course, equally problematic!).
- Bullying behaviours, such as threats, yelling, exclusion from work or unjustified offensive criticism, which are not of sexual nature (such behaviours may constitute discrimination through intimidation or systematic persecution and must be reported but are not considered sexual harassment).

SOME EXAMPLES OF SEXUAL HARASSMENT

D. meets with a new supplier at the company's warehouse. He rushes to inform her of his sexual achievements and preferences. In subsequent meetings, he talks to her using derogatory sexual language about other female clients and mentions details of his romantic relationships with them.


A. is a secretary and her manager, S., often asks her to go out to dinner with him after work to review his agenda and other topics for the next day. In such conversations, S. often asks A. about her past relationships and sexual preferences. Even during daytime, A. catches S. staring at her while she is working. He often sends texts at her late at night telling her that he liked the clothes she was wearing at work that day. He is also used to approaching her desk, after all others have left the office, to complain about his non-existent sex life with his wife. A. has told him that his behaviour is embarrassing her, but he then blocked her way and told her that he just wanted someone to listen to him.


A low-paid gas station worker, single parent working night shifts, is informed of her dismissal two days after she turned down the business owner's flirtation.


Every time he books a sale, H. suffers the jokes of colleagues who claim he has done sexual favours to achieve it.


HOW SHOULD WE BEST BEHAVE AT WORK?

DON'T


 **Avoid** touching people in your workplace unless you are sure they agree. An unwelcome hug, a “friendly” pat or grab, can embarrass your colleagues.


 **Avoid** excessive or regular alcohol consumption in the context of your workplace.


 **Avoid** questions, jokes, comments, or conversations about your sex life or the sex life of the people you work with.


 **You are not allowed** to bring into your work environment, whether physical or online, any material that can be offensive to people you work with, especially if it is sexually explicit.

DO

 **Ask:** “May I?” and respect any answer, even if it is expressed with a grimace or a dodge.

 **Make sure** that your colleagues can find you and communicate with you in places where alcohol, relaxed behaviour or increased familiarity are not necessarily included.

 **Apologize** if you realise that a colleague felt uncomfortable with something you said, asked, or implied about their personal life.

 **When communicating online,** make sure that your appearance, gestures and environment are decent and professional so as not to embarrass your counterparts.

AVOID

asking your colleagues and/or employees to fulfil personal needs that go beyond the scope of their work.

AVOID

addressing people in your professional environment with nicknames or diminutive names - address them as adults who have undertaken an important task.

PRACTICE

correctly reading the non-verbal cues of the people around you: i.e. understand from their posture, facial expressions, movements, voice, whether they feel comfortable or uncomfortable with something.

FREQUENT QUESTIONS AND CONCERNS

Moreover:

To understand and prevent sexual harassment, we may need to change certain views and behaviours that we have been accepting until recently. This is not easy and can raise questions and reflections such as:

Can't you take a joke anymore?

Humour is useful in building healthy and meaningful relationships with the people we work with, but jokes of sexual content or innuendos have no place in the workplace. With such a “joke” it is very likely that we, even unwittingly, offend one or more people, whereas we could have a laugh and interact in numerous other, safer, ways.

Have women become overly sensitive?

We may indeed find that certain behaviours that were until now considered socially acceptable, are no longer OK. This is not over-sensitivity; it is a social adaptation. But how can we adapt to the new code of communication? We can practice in recognizing the “signals” send out by our colleagues, and we also need to be open to any feedback they may give us about accidental misconduct. If we are doubtful about what we can or cannot say or do, it's a good idea to: a) ask; b) choose the safest version (“your dress is very nice” instead of “you are very sexy in this dress”); and/or c) ask ourselves what we would assume if someone behaved this or the other way to someone from our family.

What if I get wrongly accused for sexual harassment?

Cases of false accusation for sexual harassment are extremely rare (only 1.5% of reports worldwide). It is very difficult for a person, woman or man, to engage into the procedure of filing a report, which often involves risk and mental cost, unless something which has really offended their dignity, or makes their job difficult, has taken place. At all cases, the company has designed and implements a robust reporting mechanism for the management and investigation of all complaints, thus ensuring protection and fair treatment of everyone involved.

So is flirting not allowed at the workplace?

Flirting with mutual consent is not considered as sexual harassment, so we need to ensure that the other person is willingly involved in the process. If we encounter resistance, verbal or non-verbal, to our first approach, it is important to stop. Also, before making a compliment or a sexual proposal to someone, we need to make sure they have the option to say “no.” If this person is of a much lower hierarchical position than ours, if their working conditions are fragile, if they are particularly vulnerable due to their age, disability or they belong to a minority group, we should be even more cautious in our approach, so as not to exert, unwittingly, any kind of pressure that can transform flirt into a harassing behaviour.

What if I get fired because my complaint has upset the team

The company implements a policy which ensures an effective reporting and investigation mechanism and has properly trained its employees to recognize relevant possible behaviours and to confront them by declaring zero tolerance. At the same time, the company, as well as the Law, strictly prohibits retaliation (dismissal, unfavourable transfer, etc.) against people who report such incidents.

WHAT IS THE ROLE OF THE HR DEPARTMENT?

- **TO FOSTER** a culture of open communication, via establishing the appropriate channels.
- **TO CLEARLY COMMUNICATE** the company's Zero Tolerance policy.
- **TO ENSURE** that people are familiarized with the concept of sexual harassment, so that it is not considered a taboo subject.
- If circumstances permit, **TO DISCLOSE**, anonymously and with particular respect, how a crisis was managed, with emphasis on the protection afforded to the victim and the consequences entailed for the offender on a case-by-case basis, so that employees feel that each report is being assessed and investigated fairly.

WHAT ARE THE EMPLOYER'S OBLIGATIONS?

- **TO TAKE** all appropriate and necessary precautionary measures, such as paying special attention to male-dominated functions and isolated or poorly lit areas, and to foster a climate of equality and respect in corporate events, travels and business dinners.
- **TO DEVELOP** and implement appropriate corporate policies.
- **TO ESTABLISH** complaint management mechanisms supported by appropriately qualified professionals.
- **TO TAKE** practical and psychological support measures for vulnerable teams within its staff.
- **TO CONDUCT** informative, awareness-raising, empowerment and training events for employees, business partners and suppliers.

WHAT SHOULD I DO IF I FIND MYSELF IN A DIFFICULT SITUATION?

If someone in your workplace behaves in a way that makes you uncomfortable or creates a humiliating environment for you and/or your colleagues, it is important to express your discomfort, even if you are afraid it will be considered “exaggerated.” Even if you don’t feel safe enough to deal with this person, or if their behaviour persists despite your notifications, there are appropriate channels in place where you can talk about it safely and confidentially. For your report, make sure to gather details of specific events and behaviours (when, where, what).

Specifically, you can:

- (a) Report incident(s) via the whistleblowing platform at safevoice.growthfund.gr
- (b) Send the relevant report via email to safevoice@growthfund.gr
- (c) Send the relevant report by post to the Company’s address: Growthfund (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) Submit a report in writing or orally directly to the Compliance Officer.

DO NOT HESITATE to report any troubling behaviour, even if it occurred in the past. The company manages every report with confidentiality and prohibits retaliation and vindictive behaviour against the person who files the report.

You can also contact independent bodies outside the company, including:

[Hellenic Labour Inspectorate](https://www.sepe.gov.gr/ergasiakes-scheseis/nomothesia-ergasiakes-scheseis/prostasia/via-kai-parenochlisi-stin-ergasia/epivoli-dioikitikon-kyroseon-apo-tin-epitheorisi-ergasias/)

www.sepe.gov.gr/ergasiakes-scheseis/nomothesia-ergasiakes-scheseis/prostasia/via-kai-parenochlisi-stin-ergasia/epivoli-dioikitikon-kyroseon-apo-tin-epitheorisi-ergasias/

[The Greek Ombudsman](https://www.synigoros.gr/el)

www.synigoros.gr/el

[Speak Out service](https://speakout.actionaid.gr)

speakout.actionaid.gr

[SOS line 15900](https://www.synigoros.gr/el)

by the General Secretariat for Equality and Human Rights

Growthfund implements specific Code of Ethics & Business Conduct, a Policy on violence and harassment at work, a Whistleblowing Policy and a Guideline on Equal Opportunities and Diversity.

WHAT SHOULD I DO IF I OBSERVE SOMETHING?

Even if an offensive behaviour is not directed at you, you have an important role in preventing and combating sexual harassment and violence.

If you witness or become aware of such an incident:

- **OFFER YOUR SYMPATHY** and support to the victim, always maintaining the required confidentiality and discretion.
- If circumstances permit, **EXPLAIN CLEARLY** to the person that his or her behaviour was harassing, and that such behaviour is not acceptable in the context of work.
- As the incident unfolds, **TRY TO STOP IT** indicating that it is neither pleasant nor funny, but rather annoying and reprehensible.
- If you feel that you, as a witness, have been harassed by such behaviour, you can **REPORT IT** through the above channels so that the incident can be properly investigated.
- If the actual victim of sexual harassment files an official report, **SHOW YOUR SUPPORT** by confirming his/her testimony.



GROWTHFUND
ΥΠΕΡΤΑΜΕΙΟ