

	POLICY OF PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT & POLICY FOR THE MANAGEMENT OF INTERNAL COMPLAINTS CONCERNING INCIDENTS OF VIOLENCE AND HARASSMENT	
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POLICY FOR THE MANAGEMENT OF INTERNAL COMPLAINTS CONCERNING INCIDENTS OF
VIOLENCE AND HARASSMENT**

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1. Preamble - Purpose

1.1. "ATTICA DEPARTMENT STORES SINGLE MEMBER SOCIETE ANONYME" (hereinafter referred to as: "Company") shall comply with all measures and obligations relating to the application of the provisions of Part II of Law 4808/2021 on preventing and combating all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

The Company is committed to providing a safe and healthy working environment wherever its business activities are carried out and to ensure that all its employees and partners (hereinafter: "Partners") are treated and treat each other with dignity and respect.

All Company Partners are expected to behave in an appropriate manner in their working environment and to demonstrate sensitivity and respect for the personality of others.

The Company applies a zero-tolerance policy to any form of violence and harassment that occurs in the course of work, whether related to or resulting from it, including gender-based violence and harassment and sexual harassment, which are strictly prohibited for any partner of the Company.

1.2. The aim of this policy is to create and consolidate 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.

The Company wishes to ensure that all employees (regardless of hierarchical level) are treated, and treat their colleagues with dignity and respect. All Company Partners are expected to behave in an appropriate manner in their working environment and to demonstrate sensitivity and respect for the personality of others.

In this context, the Company declares that it recognises and respects the right of every employee and Partner to a working environment free from violence and harassment and that it does not tolerate any such behavior, in any form, by any person.

This policy sets out a framework for preventing, tackling and combating violence and harassment at work.

1.3. This policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the regulatory legislation pursuant thereto and includes the persons listed below under par. 3.1.

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2. Governance policy

The Division of Human Resources is responsible for the writing and content of the policies on "Prevention and combating of violence and harassment" and the policy on the "Management of internal complaints of incidents of violence and harassment" policy. It is also responsible for updating the aforementioned policies on an annual basis (if necessary).

The Policies, as well as any updates thereto, are subject to Management approval and are immediately effective upon approval.

3. Scope of application

3.1. This applies to all the Company's Partners, namely to:

- all employees of the Company with a dependent employment contract (full-time or part-time, indefinite or fixed-term),
- employees under a contract for work, independent services, or a remunerated mandate,
- those employed through third-party service providers, as well as persons undergoing training, including trainees and apprentices,
- employees whose employment relationship has ended, as well as to people applying for a job.

3.2. For the purposes of the application of this Article, forms of violence and harassment against the persons referred to in Article 3.1 may take place:

(a) in the workplace, including public and private places, and places where the employee provides work, receives pay, takes a break, personal hygiene and care facilities, changing rooms or accommodation provided by the employer,

(b) travel to and from work, other travel, trips, education, and work-related events and social activities; and

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

4. Definitions - Forms of violence and harassment in the workplace

For the purposes of the application hereof:

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(a) "Violence and harassment" means any form of conduct, acts, practices or threats thereof, intended to, resulting in, or likely to result in physical, psychological, sexual or economic harm, whether occurring in isolation or repeatedly.

So-called "bullying" is also a form of violence and harassment, i.e. an offensive, intimidating, malicious or abusive behaviour, including the misuse of power, which can make a person feel vulnerable, upset, discredited, undermined or threatened. Power can derive from a position of authority but can include personal power as well as power of coercion through fear or intimidation.

The above behaviour may be physical contact, verbal and non-verbal. It may also include behaviours such as:

- Unreasonable exclusion of a person from normal business interactions so that they feel unwelcome.
- Undermining or deliberately obstructing the work of another individual.
- Circulation of negative rumours or gossip.
- Inappropriate criticism or derogatory language about a person in front of others.
- Any other contact that suggests hostility, disrespect or unfavourable treatment of a person.

This behaviour can be conscious, but it can also be unconscious. In any case, reasonable, sincere and constructive criticism of an employee's performance or conduct or reasonable guidelines for better job performance does not constitute bullying behaviour.

(b) "harassment" and "gender-based harassment" means conduct that has the purpose or effect of violating the dignity of a person, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment and may include, but is not limited to:

- Unwanted verbal contact with threats, profanities, derogatory comments or insults, unwanted diminutives, derogatory jokes, or comments.
- Unwanted contacts or postings, such as posting or sharing derogatory photos, cartoons or drawings or sharing emails, texts or images that degrade, insult or embarrass another person.
- Unwanted physical contact.
- Sexual harassment, which may take any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, as well as the forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics.

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(c) "retaliation" means punishing someone or taking adverse employment action because a concern or complaint of possible harassment, discrimination, violence or reprisal was raised or because someone participated in an investigation. Retaliation may include:

- Termination of the employment contract,
- Disciplinary action or reduction of a person's duties, or
- Demotion or transfer of an employee.

(d) "domestic violence" means all acts of physical, sexual, psychological or economic violence that take place within the family or the home, regardless of biological or legal family ties, or between former or current spouses or partners and regardless of whether the offender shares or has previously shared the same residence with the victim.

5. Potential risks of violence and harassment at work

The Company, in cooperation with the occupational physician, will also take into account when assessing the occupational risk pursuant to Article 43 of Law 3850/2010 the potential risks and measures to combat violence and harassment at work, including sexual harassment, considering, by way of example and without limitation:

(a) Working conditions and arrangements, work organisation and human resources management, as appropriate.

(b) Discrimination, abuse of power relations and gender, cultural and social norms that support violence and harassment.

The occupational risk assessment will be updated at regular intervals, taking into account the current - each time - conditions and needs, in accordance with the applicable provisions.

6. Prevention and protection measures

Measures and practices for the prevention and control of psychosocial risks and in particular violence include, but are not limited to:

6.1. Notification of this document in all workplaces and on the Company's intranet and the Company's website.

The purpose of the notification is to:

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(a) foster a working climate where respect for human dignity, cooperation and mutual assistance are core values,

(b) open communication with management and immediate superiors to resolve and smooth out conflicts and disagreements.

6.2. The Company will promote actions to accurately inform its employees of their relevant rights in relation to this policy.

6.3. Psychological support line

The direct assistance mechanisms that exist successfully in Greece are the following:

- SOS 15900 is a national service that enables women who are victims of violence or third parties to immediately contact an agency for tackling gender-based violence. The line is staffed by psychologists and sociologists, who provide immediate assistance in emergency and urgent cases of violence on a 24-hour basis, 365 days a year. At the same time there is the possibility of electronic communication for women through the e-mail address: sos15900@isotita.gr.
- 197 - National Social Solidarity Centre helpline (for calls outside the prefecture 210-197).
- People of all ages can anonymously ask for help and find out about specialised psychosocial support and social solidarity services 24 hours a day, 365 days a year.

6.4. Avoiding excessive workload, which leads to stress and burnout - factors that can encourage aggressive behaviour.

6.5. Assigning clear roles and responsibilities and ensuring that employees have the necessary training and information to carry out their duties.

6.6. Review/update of the study regarding the assessment of the potential risks of violence and harassment when new risks or incomplete preventive and technical measures (e.g. need to install emergency alarms, improve or enhance lighting, etc.) are identified.

7. Rights of persons affected

Every person who has been subjected to violence and/or harassment has the following

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rights:

- to claim judicial protection and full compensation, covering any direct and consequential damage and moral damages.
- to appeal to the Labour Inspectorate and the Ombudsman.
- to file an internal complaint as referred to in Article 8.
- to request the assistance of the legal persons and associations of persons referred to in paragraph 2 of Article 22 of Law 3896/2010.
- to request measures concerning the person reported, in accordance with par. 2 of Article 12 of Law 4808/2021 or measures relating to his/her own protection, such as changing the place of work and/or working hours and/or working remotely (if permitted by the nature of the work).
- to leave the workplace for a reasonable period of time, without loss of pay or other adverse consequence, if, in his/her reasonable belief, there is an imminent serious risk to his/her life, health or safety, in particular, when the necessary appropriate measures have not been taken to protect him/her or when such measures are not sufficient to stop the behaviour of violence and harassment. In this case, the person subjected to violence or harassment must inform the Company in writing beforehand, reporting the incident of violence and harassment and the facts that justify his/her belief that there is a serious risk to his/her life, health or safety.

8. Internal complaints management policy

8.1. Any person who believes that he/she has been subjected to violence and/or harassment, as well as any person who becomes aware of incidents of violence and/or harassment in violation of this policy, may immediately and without any delay, report the incident to his/her supervisor, provided that the supervisor is not involved in any manner with the reported incident.

Alternatively, especially if the submission of a report/complaint to the Supervisor is not possible for whatever reason, the report/complaint is submitted directly to the Company's Human Resources Division.

The aforementioned report/complaint may be written or oral, named or anonymous. However, anonymity may, in some cases, limit the Company's ability to investigate the

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complaint.

8.2. Supervisors, who receive reports/complaints regarding incidents of violence and harassment, take immediate and appropriate measures to protect the affected person and at the same time report the matter in writing to the Company's Human Resources Division.

In cooperation with the Company's Human Resources Division and upon agreement with the complainant, until the full investigation and final examination of the persons reported, the Supervisors may take the following indicative measures on a temporary basis, in order to protect the affected persons, depending on the case:

- change of staff shifts,
- transfer of the complainant to another work department,
- the employment of the complainant by teleworking or telecommuting, depending on the nature of his/her duties,
- grant of paid leave to the complainant.

8.3. The Company, through the Human Resources Division, shall immediately investigate and examine the complaints, with impartiality and protection of confidentiality and personal data of the victims and the complainants, in accordance with the law. Nevertheless, when investigating the complaints, complete anonymity may not always be possible, for example, either when conducting interviews with the complainant, the witness(es) and the person reported, where details about the allegations may be brought to their attention, or following intervention by a public authority, subject, however, always to the necessary legal requirements for the protection of the personal data of the parties involved and with adherence to the confidentiality and discretion of those who may obtain such knowledge.

Where possible, the Company will also consider the person alleged to have committed the harassment. As appropriate and depending on the circumstances, the Company may also review documents (including electronic communications) related to the investigation that are available or accessible by the Company.

8.4. In the event of confirmation, in whole or in part, of the allegations, the Company shall take the necessary, appropriate and proportionate measures, as appropriate, against the

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person reported, in order to prevent and avoid the recurrence of similar incidents or conduct. These measures shall include in particular:

- the compliance recommendation,
- the change of position, working hours, place or manner of work,
- or even the termination of the employment or cooperation relationship.

8.5. The Company will never retaliate against a complainant, nor will it allow retaliation to occur, to anyone who reports in good faith a possible violation of the law or this Company policy. Any form of retaliation is prohibited. It constitutes unconventional behaviour and may lead to the termination of the employment contract. However, this prohibition is not intended to protect persons who deliberately make false allegations. In the case of employees who knowingly submit a false complaint, the above shall also apply.

8.6. Early reporting is the most effective method for resolving actual or potential incidents of harassment. The Company encourages all those subject to this policy to file complaints in a timely manner, so that prompt and constructive action can be taken.

8.7. The Company will always be at the disposal of the competent public authorities in order to assist, in any way, in the investigation and clarification of the reported incidents.

8.8. Each Affiliate of the Company has a duty to cooperate with the Company in any investigation conducted into complaints hereunder.

9. Protection of victims of domestic violence

Any Partner of the Company, who suffers domestic violence, can seek advice or psychological support at the psychological support helplines mentioned above under par. 6.3.

The Company will assist any Partner who informs it that he/she suffers domestic violence, by any appropriate means or reasonable accommodation, which may include:

- Flexible working arrangements for a fixed period of time and periodic review.
- Planning for safety and protection in the workplace (e.g. employment in a non-isolated area, selective control of visits by immediate family, etc.).

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to the disciplinary procedure beforehand, if due to conduct in violation hereof, the continuation of the employment relationship cannot reasonably and in good faith be continued.

13. Protection of personal data

For information on the processing of your personal data in the context of the employment relationship, please see the relevant applicable Policy.