



369

AUDIOVISUAL

POLICY
FOR COMBATTING VIOLENCE AND HARASSMENT IN THE WORKPLACE &
HANDLING RELATED INTERNAL COMPLAINTS
(Articles 64 and 65 of Presidential Decree 80/2022 –
Articles 9 and 10 of Law 4808/2021)

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I. Declaration - Purpose

1.- 369AV PRIVATE COMPANY (hereinafter the '369') affirms its zero tolerance of incidents of violence and harassment at work.

2.- The purpose of this Policy is to ensure a safe working environment for all persons employed by 369, by preventing and responding to incidents of violence and harassment at work, in compliance with the provisions of articles 9 and 10 of Law No. 4808/2021 (Government Gazette 101 A'/ 19.06.2021), which ratified Convention 190/21.06.2021 of the International Labour Organisation (ILO) on 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).

II. Definitions

1.- 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 they occur in isolation or repeatedly.

2.- Physical violence: Refers to any attempt to physically attack another person or group of persons, and/or the infliction of bodily harm, and/or damage to objects or property.

3.- Harassment / Mental 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.

4.- 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.

5.- 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 behavior includes not only direct actions but also those carried out through social networks/online

6.- 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.

7.- 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.

8.- 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.

III. Scope

1.- This Policy applies to persons working for and employed by 369, regardless of their contractual status, including those employed under dependent employment relationships (permanent or fixed-term, probationary, etc.), contractors for particular projects, independent contractors, independent service providers, persons employed through third-party service providers, suppliers, contractors and subcontractors of 369 and persons employed on their behalf, as well as persons undergoing training, including interns and apprentices, volunteers, pro bono workers, employees whose employment has ended, and job applicants.

2.- For the purposes of this Policy, instances of violence and harassment may be directed against any of the persons referred to in paragraph 1 of this article **or** come from any of the persons referred to in paragraph 1 of this article, but also from third persons, and must occur in the context of the individual's work, in the broad sense of the term, and participation in work-related activities, **particularly:**

(a) in the workplace, including all places where the working person provides work, receives remuneration, takes breaks, particularly for rest or meals, in personal hygiene and care facilities, changing rooms, or accommodation provided by 369,

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

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

IV. Assessment of the Risks of Violence & Harassment

1.- Forms of employment harassment:

- malicious comments relating to an individual's personality, manner of expression and behaviour, habits and opinions,
- disclosure of personal information, spreading false rumours, slander,
- ridicule, contempt,
- attacks with raised voices and 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/experience,
- withholding information necessary for the performance of their duties,
- undervaluing of abilities with constant daily concentration on mistakes and weaknesses,
- creating rules that disadvantage them which others do not have to follow,
- excessive monitoring, exposure to adverse conditions (e.g., smoking, loud music, etc.),
- deliberate strategies to isolate them,
- systematically ignoring their suggestions as if they were absent,

- prohibiting others from speaking to them,
- exclusion from meetings, seminars, social events,
- refusal to grant leave, without any genuine work-related justification,
- inventing conditions for exercising their employment rights that deter them from asserting those rights,
- threats of punishment if they file complaints with management,
- intentional falsification of performance reviews to suggest negative assessment,
- intimidation through violent actions (e.g., loud banging of a hand on the table, slamming a door in their face).

1.1.- Administrative actions such as the following do not constitute harassment or unequal treatment:

- Application of performance criteria set by 369.
- Feasible deadlines for the completion of a project.
- Constructive feedback on the results of the employee's work.
- Regular feedback.
- Reporting unsatisfactory performance, provided the assessment is fair and the employee has been given the necessary means, information and knowledge to carry out their duties.
- Observation of inappropriate or unethical behaviour.
- Changes in duties & responsibilities provided that the initial and essential terms of the original employment contract remain unchanged and are in force as regulatory.
- Direct supervision of employees, including setting performance expectations.
- Taking measures to correct performance, such as placing an employee on a performance improvement plan.
- Assigning tasks and providing guidance on how and when they should be completed.
- Requesting updates or progress reports.
- Justified approval or denial of leave.
- Request for documentation of absence for health reasons based on current regulations.
- Ethical and/or financial reward for excellent employee performance.
- Providing constructive feedback regarding work performance.

2.- Forms of sexual harassment (indicative):

- any action that entails physical contact without the consent of both parties (e.g. touching, grabbing, hugging, etc.),
- requests for sexual favours accompanied by implied or overt threats regarding the targeted employee's job performance evaluation, promotion or other job benefits or damages,
- subtle/implied or obvious pressure for unwanted sexual activity,
- unwanted sexual and unethical advances or pressure for sexual intercourse,
- constant exhortations to engage in social activity outside work (when it has been made clear that this is undesired),
- inappropriate flirting,
- obscene remarks,
- different types of insinuations,

- sexually oriented gestures, verbal expressions, remarks or jokes/comments about a person's sexuality or sexual experience,
- stereotypes/stereotypical gender-related attitudes,
- displays or publications of sexual material such as pictures, posters, calendars, graffiti, objects, advertising material, reading materials,
- obscene, undesired or offensive online communication, emails and phone calls.

V. Employee Awareness - Rights & Obligations

1.- Each person covered by this Policy is entitled to:

- be treated with respect and courtesy,
- not be subjected to violent behaviour, harassment, including sexual and gender-based violence, discrimination or intimidation,
- report any incident of unethical conduct in the workplace (in accordance with this Policy, as explained below), without being victimised or suffering any other adverse consequence or retaliation.

2.- Each person covered by this Policy must:

- comply with this Policy and all applicable and valid procedures in order to protect their own personal safety and that of other employees of 369,
- participate in initiatives and training programmes organised by the 369 which relate to incidents of violence and harassment,
- immediately report any incident of violence or harassment to the 'contact person',
- cooperate with any investigation of a complaint which has been submitted in accordance with the procedure set out below,
- correct their own behaviour when they perceive that it is annoying or offensive to another person (colleague, collaborator, etc.),
- not feel uncomfortable, ashamed or blame themselves for the behaviour of the perpetrator,
- calmly and decisively reject or confront violent or bullying behaviour,
- to act in good faith and refrain from making false, inaccurate or defamatory allegations.

VI. Obligations of Managers & Supervisors

For the purposes of this Policy, individuals who head or direct departments or directorates respectively within 369 should:

- adopt exemplary behaviour in the performance of their duties and lead those with whom they work by example,
- systematically promote this Policy to all members of their teams,
- actively participate in educational seminars, awareness-raising talks and/or campaigns organised by 369,
- be alert to incidents of violence and harassment, observing any change in employee behaviour and performance and seeking their feedback,
- take action before violence and harassment escalates (in the early stages), providing immediate help to deal with the incident and ensuring adequate supervision of the work environment,

- demonstrate skill in effective conflict resolution management,
- encourage individuals they work with to report any incidents of violence and harassment and respond promptly, seriously and in the most appropriate manner, with full respect and empathy for each complaint,
- immediately inform the 'contact person' as soon as they become aware of any potential incident violating relevant legislation or a complaint regarding violence and harassment.

VI. Obligations of 369

In relation to incidents of violence and harassment, 369 has the following general obligations:

- **to receive, investigate and manage any complaint or report**, demonstrating zero tolerance for violence and harassment, with complete confidentiality and in a manner that respects human dignity, and not to obstruct the receipt, investigation and management of such complaints or reports,
- **to provide assistance and access to any competent public, administrative or judicial authority** during the investigation of such an incident or behaviour, upon request from such authority,
- **provide information** to individuals covered by this Policy on the potential risks of violence and harassment in the workplace and related prevention and protection measures, including the obligations and rights of both the employees and 369 in relation to such incidents.

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

369 takes measures to prevent violence and harassment at work. **Specifically**, 369:

- provides information to individuals covered by this Policy regarding the potential risks of violence through informative leaflets, emails, etc.,
- provides appropriate training at regular intervals aimed at guiding and advising on forms of workplace violence and harassment,
- will use questionnaires, in which responses will be given anonymously by the individuals subject to this Policy, to gather the views of employees regarding their working conditions and any comments or suggestions they may have regarding these conditions.
- has designated a 'contact person' who, among other responsibilities, is tasked on a daily basis with the duty of informing individuals covered by this Policy about issues relating to violence and harassment in the workplace.

IX. Measures for Addressing Incidents of Violence and Harassment in the Workplace

1.- In the event of an incident or behaviours that constitute violence and harassment in the workplace, the individual who has experienced such behaviour may submit a verbal or written complaint to the 'contact person'. The complaint shall be submitted in person or to the contact person's email address listed below or by telephone contact with the contact person.

2.- The contact person promptly forwards/notifies the complaint to the **Legal Counsel** who is responsible for assessing named and anonymous complaints, providing opinions to the Managing

Director of 369 as to their reliability and suitability for further investigation, conducting relevant inquiries, and presenting its written findings to the Managing Director of 369.

3.- The Legal Counsel investigates each credible complaint thoroughly and gathers any necessary evidence relating to it. Specifically, the Legal Counsel may interview the parties involved (complainant and accused), examine witnesses, request the submission of any documents that might exist which prove whether any incident of violence and harassment occurred, and communicate with the heads of departments and directorates of 369. After completing its investigation, the Legal Counsel submits a written report to the Managing Director of 369, who makes a reasoned decision on the complaint. This decision, along with the Legal Counsel's report, is communicated to the parties involved (complainant and accused) to ensure that they are informed of it. The completion of the investigation and the submission and communication of the Legal Counsel's report to the Managing Director must take place as soon as possible and generally not later than three (3) weeks from the date the complaint was submitted by the complainant. The Managing Director has the option to request further investigation of the case from the Legal Counsel or to undertake investigations itself.

4.- In the event that an incident of violence or harassment is proven, the Managing Director shall, on a case-by-case basis, take all necessary, appropriate and proportionate measures. These measures may include, but are not limited to:

- (a) issuing the employee with a compliance recommendation,
- (b) changing their role, working hours, location and the manner in which work is assigned to them,
- (c) terminating their employment or cooperation contract, or supply or project contract, with 369.

5.- The investigation of complaints and issuance of decisions regarding them are governed by the following principles:

- **Prohibition of retaliation against or further victimisation of the aggrieved person and potential witnesses:** all complaints, regardless of how they are submitted, will be investigated in a way that ensures that no retaliation is inflicted on the complainant or any potential witnesses. It is prohibited and invalid to terminate or in any way dissolve the legal relationship on which employment is based. Equally prohibited is any other adverse treatment of a person who reports an incident of violence or harassment or is a witness to such an incident, if it constitutes retaliatory behaviour or a countermeasure for submitting the complaint.
- **Confidentiality:** All persons to whom complaints of violence or harassment are submitted have an obligation to handle the cases with absolute confidentiality.
- **Anonymity:** Where a complaint has been submitted anonymously, the investigating body may seek face-to-face or telephone contact if this is deemed necessary for the investigation. However, if the aggrieved person does not wish to disclose their identity, this will be fully respected and the complaint will remain anonymous.
- **Impartiality:** The investigating body shall act with impartiality and a clear sense of duty. If for any reason this is not possible, the Managing Director of 369 shall be informed and shall take appropriate action, as required.
- **Personal Data Protection:** The personal data of all parties involved are protected to the maximum extent possible, in accordance with relevant national and EU legislation regarding the protection of personal data, by all persons involved in the investigation and evaluation of the reports.

6.- In the event that the aggrieved person has reported the incident of violence and harassment to any administrative or judicial authority, 369 is committed to providing any necessary assistance and support, as well as any relevant information it may possess to these authorities.

7.- In cases where the intervention of the authorities (e.g. the police) is deemed necessary following notification by 369, the appropriate actions will take place under the guidance of 369's Legal Counsel.

8.- From the disclosure of the incident and for the time it is considered necessary, 369 will ensure the provision of moral and psychological support, assistance and reintegration services to the victim, where deemed appropriate.

9.- In any case, 369 reserves the right not to follow the procedure described above for managing incident of workplace violence and harassment, when it has reasonable grounds to believe that the complaint, accusation or protest has been submitted outside reasonable limits set by principles of good faith and good morals, or is manifestly lacking in substantial merit.

X. Legal Rights of Aggrieved Persons

Any person who has been subjected to violence and harassment has the right, in addition to filing a complaint:

- To exercise any of their legal rights, by taking appropriate legal actions and remedies as necessary.
- To appeal to the Hellenic Labour Inspectorate (SEPE): <https://www.hli.gov.gr>. SEPE complaints hotline via the citizens' helpline: 1555.
- To contact the Ombudsman: 17 Halkokondyli, 10432 Athens, Greece, E-mail: press@synigoros.gr Tel: (+30) 213 1306 600.
- To contact the immediate psychological support and counselling service for women victims of gender violence: SOS Line 15900.
- Request a change of position and/or working hours, if the harassment has been documented, and despite relevant recommendations, reprimands and/or disciplinary measures, etc. have been followed, incidents of harassment continue to occur.
- To refrain from work for a reasonable period, without any impact on employment relations, including salary, if they reasonably believe there is a serious threat to life, health or safety, especially if necessary measures for their protection have not been taken or if the measures taken are not adequate to stop violent or harassing behaviours. In such cases, the employee refraining from work is required to inform 369 in advance and in writing, detailing the incident of violence or harassment and the facts supporting their belief that there is a risk to their life, health or safety.
- To seek full compensation for any losses or damages before the Court.

XI. Special Care for Victims of Domestic Violence

369 is committed to protecting employment and providing support by all appropriate means to employees who are victims of domestic violence. In order manifest its commitment, 369 may take the following indicative actions:

- change of role, working hours or place of work,
- change in the method of work provision and access to flexible forms of employment,
- provision of moral and psychological support services,

- provision of assistance to facilitate communication and access to support structures.

XII. Contact Person

A contact person ('Liaison') at 369 level, responsible for guiding and informing employees about the prevention and handling of workplace violence and harassment, as well as for receiving relevant verbal and/or written complaints as described above, is Mr. Odysseas Kokkinakis e-mail: odysseas@369av.gr - tel.: 6932334185.

XII. Policy Review

369 reserves the right to make additions and general amendments to the content of this Policy, within the framework and under the terms and conditions set by the applicable legislation.

Athens, 01-10-2025
The Managing Director of 369 AV PC
Tina Petrovic