

## **POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT AT WORK**

### **INTRODUCTION**

Enaon and its subsidiaries (hereinafter referred to as the "Companies"), fully respecting the rights of employees and providing comfortable and safe working conditions, are committed to maintaining a healthy working environment, where all employees are treated with dignity and respect, as well as to comply with the relevant legislative framework on harassment and violence at work. Any form of harassment and violence in the workplace is not acceptable. For these purposes, the Companies, in addition to the Internal Labor Regulation and the Code of Ethics & Ethics they apply, adopt this Policy, in compliance with the provisions of Law 4808/2021, Law 4443/2016, Law 3896/2010, Law 4624/2019, and, more broadly, with the existing legal framework and Greek and International practices on this issue.

### **DEFINITIONS**

'Violence and harassment' means behaviour, acts, practices or threats thereof which are intended, lead to or are likely to result in physical, psychological, sexual or economic harm, whether occurring individually or repeatedly, and may take place: (a) in all workplaces, including offices and in the field, where workers perform work; take breaks in personal hygiene areas, changing rooms or other areas of the Company, b) travel to and from work, other movements, travel, education, as well as work-related events and social activities and c) during work-related communications, including those made through information and communication technologies, but also on social media.

'Harassment' means conduct which has the purpose or effect of violating the dignity of the person and of creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not it constitutes a form of discrimination, including harassment based on sex, age, disability or health status, marital status, nationality, racial or ethnic origin, religion, political opinion, sexual orientation; or other characteristics, or towards a relative, friend or associate of the person or for other reasons of discrimination, but also behaviors that may be considered as such by the victim.

'Gender-based harassment' means conduct related to a person's sex which has the purpose or effect of violating that person's dignity and of creating an intimidating, hostile, degrading,

humiliating or offensive environment. Such conduct includes sexual harassment as well as conduct related to a person's sexual orientation, expression, gender identity or sex characteristics.

"Bullying" means the form of Violence or Harassment, with physical or psychological abuse, reduction or coercion of a person, whether this is done by a colleague to the "target" person ("staffing") or is done by a hierarchical supervisor to subordinate ("bossing") or is done by a group of individuals to a person ("mobbing").

## UNACCEPTABLE BEHAVIOR

The Companies expressly prohibit behaviors/acts or threats of harassment: race, gender, color, sexual orientation, religion, origin, nationality, citizenship, age, marital status, disability, etc. Harassment covers a wide range of expressions from overt solicitation of a sexual nature (e.g. lewd behaviour or acts, insults, vulgar jokes or slander, obscene material in the workplace) to verbal or non-verbal threats, insults or ridicule, assault or obstruction of normal functioning, generally cases where the offensive behaviour results in the creation of a hostile environment.

Indicative (and not restrictive) examples of the above behaviors are:

- Physical violence or threat thereof
- Aggressive or threatening behavior that may cause fear both in a particular person and in groups of persons
- The oppressive or persecutory behavior or threat thereof
- Threats related to job or working conditions
- The expression of hostility, verbal or otherwise,
- Degrading or offensive behavior, verbal and practical, slanderous or offensive or derogatory comments or jokes, insults, defamation or belittling or mocking a person or their abilities, outbursts of anger, persistent or unjustified criticism
- Revenge behavior, exclusion from social events, working group meetings and trainings, discussions and collective decisions, cyberbullying, offensive emails, letters and phone calls
- Sexual or racist comments, innuendo, jokes, mockery and gestures, comments about appearance or character
- Malicious comments or insults regarding gender or sexual orientation, religion, age, type of marriage, pregnancy and maternity, any disability, etc.
- Prying questions or innuendos about personal or sexual life

- Invitations (oral or written or other expression and by any means) for erotic/sexual intercourse
- Incidents of domestic violence

## SCOPE

This Policy binds: the members of the Board of Directors (BoD) and the persons exercising managerial duties in the Companies, as well as the staff, executives and Managements of the Companies, regardless of the contractual form that connects the parties. In particular, it includes all those associated with the Companies by an employment contract (indefinite or fixed-term, full-time or part-time), a work contract, a secondment, a contract of independent services, a salaried mandate, a loan agreement, an apprenticeship contract, employees with outsourcing (through third-party service providers), voluntary work, employees whose employment relationship has ended, prospective employees, other persons who may cooperate or deal with the Companies, etc.

## PREVENTION AND RESPONSE MEASURES

The Companies make every effort to ensure a safe and stable working environment, in which all employees can work without fear of possible harassment or violence. For this reason, the Companies:

- 1) supervise the implementation of this Policy, review it whenever there is a need and take action in cases of employee non-compliance,
- 2) provide information and appropriate training to employees on dealing with incidents of violence and harassment, managing them, their responsibilities and rights in order to:
  - awareness of the risks of incidents of Violence and/or Harassment in the work environment,
  - understanding and consolidating the boundaries between acceptable and unacceptable behaviors that may produce discrimination and/or morally, socially or otherwise offend people,
  - familiarity and knowledge for the prevention, recognition and handling of incidents of Violence and/or Harassment in the workplace
- 3) have appointed [ethicscommittee@ena-on.gr](mailto:ethicscommittee@ena-on.gr) online account as a corporate "liaison", responsible for guiding and informing employees on preventing and dealing with violence and harassment at work,

- 4) in cooperation with the Occupational Doctor and the Safety Officer, update the Written Occupational Risk Assessment to include psychosocial risks, including risks of violence and harassment at work, to prevent incidents of violence and harassment in the workplace,
- 5) ensure employment protection and support for workers who are victims of domestic violence, as far as possible, by any appropriate means or reasonable accommodation, e.g. flexible working arrangements, safety measures and psychological support, etc.
- 6) receive, examine, investigate and handle any complaint, confidentially and in a manner that respects human dignity;
- 7) impose the necessary and appropriate sanctions where prohibited conduct is detected by any worker.
- 8) They encourage any employee to report any behavior that constitutes mobbing and harassment in the workplace and is contrary to Human Rights, by anyone, including supervisors, colleagues, visitors, contractors, clients or any other person.
- 9) Post this Policy on internal corporate websites and inform all staff accordingly.

## **OBLIGATIONS OF EMPLOYEES**

Any person covered by the above scope of this Directive shall:

- a. know and comply with this Policy and related procedures;
- b. accept the information and instructions related to this Policy;
- c. report immediately and to the competent persons (and only) any incidents of violence or harassment that come to his attention,
- d. cooperate in the investigation of relevant reports/complaints.

In particular, the Directors, the Supervisors and the Executives of the Companies in general, must primarily implement this Policy, discourage behaviors of violence and harassment, encourage zero tolerance of such behaviors and report them, ensure compliance with this Policy and the relevant procedures.

## **INCIDENT RESPONSE**

The Companies have put in place a Policy for the Management of Reports/Complaints, which is supplementary to the general Procedure for the Management of Anonymous and Non-Anonymous Reports & Complaints that they apply. The Companies investigate in a prompt, thorough and transparent manner any reports / complaints of harassment and / or violence

and safeguard in the best possible way the confidentiality of the information and personal data of the survey.

## **CONSEQUENCES OF CONFIRMED MISCONDUCT**

Any employee of the Companies who is found to have violated the prohibitions hereof, in addition to any legal consequences, shall be subject to disciplinary measures.

Disciplinary measures are imposed, in accordance with the Internal Labour Regulation, and on the basis of the principles of appropriateness, appropriateness and proportionality in relation to the violation in question.

In addition, the Companies may decide to take other organizational or administrative measures, as well as the termination of the contract of an employee who has demonstrated Violence and/or Harassment behavior.

Athens, 14 February 2024

THE CHIEF EXECUTIVE OFFICER

Barbara Morgante