

Policy on the Prevention and Combating of Violence and Harassment in the Workplace and the Procedure for Receiving and Examining Complaints

Anatolia adheres to all measures and obligations concerning the implementation of Articles 58–69, 507–508, 533, and 537 of Presidential Decree 62/2025 (Government Gazette A' 121) regarding the prevention and handling of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

This policy aims to create and maintain a work environment that respects, promotes, and safeguards human dignity and every person's right to a workplace free from violence and harassment. Anatolia recognizes and respects every employee's right to a workplace free from violence and harassment and does not tolerate any such behavior, in any form, by anyone.

This policy is adopted in accordance with Article 62 of Presidential Decree 62/2025 (Government Gazette A' 121) and the regulatory legislation issued pursuant thereto, and it applies to the persons referred to in paragraph 1 of Article 59 of Presidential Decree 62/2025 (Government Gazette A' 121).

5.1 Definitions

For the purposes of this policy, the following definitions apply:

1. "Violence and harassment" means forms of behavior, acts, practices, or threats thereof that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, whether they occur in isolation or repeatedly.
2. "Harassment" means forms of behavior that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether they constitute a form of discrimination, and includes harassment on grounds of gender or on other grounds of discrimination.
3. "Gender-based harassment" means forms of behavior associated with a person's gender, which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment. These forms of behavior include sexual harassment (as defined below), as well as forms of behavior associated with the person's sexual orientation, gender expression, gender identity, or gender characteristics.
4. "Sexual harassment" means any form of unwanted verbal, psychological, or physical behavior of a sexual nature that aims at or has the effect of offending a person's personality, in particular by creating an intimidating, hostile, degrading, humiliating, or offensive environment around that person.

5.2 Prohibition of Violence and Harassment at Work

5.2.1 All forms of violence and harassment that occur during work, whether connected with work or arising out of it, are prohibited, including violence and harassment on grounds of

gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or any other legally protected characteristic.

5.2.2 Indicatively, the following are strictly prohibited, among others:

- (a) comments containing expressions of a sexual nature or other malicious comments, when directed at persons who have not explicitly indicated a desire to receive such comments;
- (b) comments or persistent questions about outward appearance, gender, religion, race, or sexual orientation that cause shame or embarrassment;
- (c) circulation and/or display of material of a sexual nature and any other content offensive to human personality or dignity (e.g., photographic, digital, or printed material);
- (d) unwanted comments with sexual innuendos or the sending of messages with sexual content, sexual gestures, or acts (e.g., any unwanted physical contact aimed at assault or pressuring someone into sexual relations);
- (e) persistent requests for dates, threats, or insinuations that one's sexual favors can advance their career, or that refusal to enter into a sexual relationship may negatively affect their professional progress within the Organization;
- (f) use of obscene, threatening, or offensive language, including online bullying;
- (g) obscene, threatening, violent, or offensive gestures;
- (h) coercion into sexual encounters or contact;
- (i) belittling or ridiculing a person or their abilities, either in private or in front of others.

5.2.3 Anatolia is committed to providing a working environment free from discrimination, intimidation, and unlawful harassment. Harassment is a form of discrimination that is offensive, affects the performance of employees/collaborators, undermines the integrity of the organization's relationship with its employees/collaborators, and harms the company's productivity and stability.

5.3 Prevention and Combating of Violence and Harassment at Work

Assessment of the risks of violence and harassment at work.

The risks arising from violence and harassment at work can prove to be very serious, both for employees and for the organization itself. More specifically, for employees, the risks include in particular:

1. violation of human dignity and causing moral harm,
2. causing anxiety, stress, anger, and fear during the performance of work,
3. causing psychosomatic symptoms (such as headaches, tachycardia, increased blood pressure, sleep disorders, etc.).

At the same time as employees, the organization itself also faces risks such as:

1. disruption of labor relations and the smooth operation of the organization,
2. reduced productivity,
3. legal and financial consequences,
4. negative publicity.

However, the prevention, control, and mitigation measures for the risks of violence and harassment at work, as well as the monitoring and management of such incidents or forms of behavior implemented by the organization, the information and awareness-raising actions it carries out among its staff regarding issues of violence and harassment, combined with the methods of work organization, the nature of its activity, and the strict compliance with the applicable legislation on health and safety at work, contribute significantly to improving the level of protection of employees and to effectively addressing the associated risks.

5.4 Measures for the prevention, control, mitigation, and handling of incidents of violence and harassment at work, and for monitoring such incidents or forms of behavior

Anatolia adopts the following measures and commits to implementing the administrative practices set out below for the prevention and control of risks of violence and harassment:

- It encourages all its employees/collaborators to maintain a working climate in which respect for human dignity, cooperation, and mutual support are core values.
- It ensures open communication with Management, direct supervisors, and colleagues.
- It establishes a specific procedure for handling reports/complaints, as specified in the relevant chapter of this policy.
- It receives, investigates, and handles every complaint or related report, demonstrating zero tolerance for violence and harassment, with confidentiality and in a manner that respects human dignity. It follows every prescribed procedure, respecting confidentiality and protecting the personal data of those involved.
- It ensures the unimpeded receipt, investigation, and handling of such complaints or reports.
- It provides assistance and access to any competent public, administrative, or judicial authority during the investigation of such incidents or behaviors, if requested.
- It ensures that employees have the necessary training/information to carry out their duties.

- It organizes actions to raise employee awareness of healthy behavioral standards, as well as on issues concerning vulnerable groups of employees.
- It guides and supports victims of violence and harassment in their reintegration into the workplace by any appropriate means or reasonable accommodation.
- It supervises the proper implementation of employee health and safety measures.
- It assesses psychosocial risks, including the risks of violence and harassment, including sexual harassment, and takes appropriate measures for their prevention, control, and mitigation.
- It regularly assesses the effectiveness of the preventive and response measures implemented and revises/updates the risk assessment and the measures accordingly.

Furthermore, Anatolia reinforces the competencies of the occupational physician, who:

- Advises on matters of work physiology and psychology, including the prevention of violence and harassment at work, including sexual harassment, ergonomics and work hygiene, the arrangement and configuration of workstations and the work environment, and the organization of the production process.
- Advises on matters of initial placement and change of job position for health reasons, physical or mental, temporarily or permanently, as well as on the integration or reintegration into the production process of persons experiencing discrimination or victims of violence and harassment, including sexual harassment, as well as victims of domestic violence, including by indicating the reconfiguration of or reasonable adjustments to the job position.
- Provides emergency treatment, particularly in the event of an incident of violence or harassment.

5.5 Information and awareness-raising actions for staff on issues of violence and harassment

Anatolia declares its zero tolerance for incidents of violence and harassment and undertakes the following actions to raise awareness among its staff regarding these phenomena:

- Through this policy, it provides staff with information and details on the risks of violence and harassment, as well as related prevention and protection measures, existing procedures, and the options available under the law in the event of such incidents.
- It may organize targeted staff meetings to discuss relevant issues and to address potential risks in a timely manner.
- It may conduct seminars with mental health specialists or providers of counseling services, etc.
- It encourages employees and management executives to participate in training programs and educational seminars on recognizing and managing the risks of violence and harassment at work.

5.6 Information on the rights and obligations of employees and of Anatolia in the event of the occurrence, reporting, or complaint of incidents, as well as on the relevant procedure

Every employee/collaborator of Anatolia who is affected by an incident of violence and harassment against them, even if the employment relationship under which the incident or behavior is alleged to have occurred has ended, has the following rights:

- The right to judicial protection.
- The right to appeal, to submit a complaint, and to request the settlement of a labor dispute to the Labor Inspectorate, within the framework of its legally defined competences.
- The right to report to the Greek Ombudsman, within the framework of its legally defined competences, as the body for promoting and supervising the principle of equal treatment.
- The right to file a complaint within the company in accordance with this policy.

In any case, when a report or complaint of such behavior arises within the company, the affected person retains all their rights to appeal to any competent authority.

Furthermore, any person covered by this policy who suffers an incident of violence and harassment against them has the right to withdraw from the workplace for a reasonable period of time, without loss of pay or other adverse consequences, provided that, in their reasonable belief, there is an imminent serious risk to their life, health, or safety, particularly when the perpetrator of such behavior is a person exercising managerial authority or representing Anatolia, or when Anatolia fails to take the necessary and appropriate measures to restore workplace peace, or when such measures are insufficient to stop the violent or harassing behavior.

In such a case, the person withdrawing is obliged to inform Anatolia in advance in writing, stating the incident of violence and harassment and the circumstances that justify their belief that there is an imminent serious risk to their life, health, or safety.

If the risk no longer exists, and the affected person refuses to return to the workplace, Anatolia may refer the matter to the Labor Inspectorate with a request to resolve the dispute. In such a case, Article 18 of Law 4808/2021 shall apply. In any case, violating the aforementioned prohibition gives rise, among other things, to a claim for full compensation for the affected person, covering their positive and negative damages, as well as their moral harm.

Obligations of Anatolia and its competent bodies in the event of the occurrence, reporting, or complaint of an incident of violence and harassment

Anatolia and the persons exercising managerial authority or representing the organization, to the extent and degree of their own responsibility, are obliged to initiate the prescribed

procedure for the management and handling of incidents of violence and harassment as soon as they become aware of any incident, without culpable delay, as this procedure is provided for in the relevant chapter of this policy. When an employee or a person engaged in any other capacity violates the prohibition of violence and harassment, the organization is obliged to take the necessary, appropriate, and proportionate measures on a case-by-case basis against the reported person, as specified in the relevant chapter of this policy, in order to prevent and ensure that a similar incident or behavior does not recur.

5.7 Definition of the contact person

The Human Resources Director of the organization is designated as the contact person ("liaison") at enterprise level, responsible for guiding and informing employees/collaborators regarding the prevention and handling of violence and harassment at work.

The contact person's role is advisory/informational: it consists of guiding and informing employees/collaborators, whether or not they approach them in connection with an incident or complaint of violence and harassment. Access by employees to the contact person shall be easy and direct, and in particular they may contact them via email address (e-mail) nkotanid@anatolia.edu.gr and by telephone at 2310398258.

In any case, the aforementioned person is obligated to protect Personal Data that may come to their knowledge during the exercise of their role.

5.8 Protection of employment and support for employees/collaborators who are victims of domestic violence

Anatolia, demonstrating in practice its social responsibility towards the phenomenon of domestic violence, adopts the following measures:

- Protection of the employment of victims of domestic violence by any appropriate means or reasonable accommodation.
- Provision of special leave or flexible working arrangements upon the request of the employee/collaborator who is a victim of domestic violence, with the aim of supporting them in maintaining their employment and in their smooth reintegration following such incidents, particularly in cases where there are minor children or children with disabilities or serious illnesses.

5.9 Communication channels – Responsible persons

Anatolia ensures safe and easily accessible communication channels for receiving complaints. The Human Resources Department of the organization is designated as the competent service that will receive, examine, and handle complaints or grievances from affected persons regarding behaviors of violence or harassment.

Specifically, affected persons may address any issue concerning the violation of the prohibition of violence and harassment at work to the contact person ("liaison") at the organizational level, namely the Human Resources Director, via email address (e-mail) nkotanid@anatolia.edu.gr and by telephone at 2310398258.

Management Team for Potential Incidents of Violence and Harassment

The Management Team for Potential Incidents of Violence and Harassment is composed of the following persons:

1. Magdaleni Doudou, Legal Advisor
2. Anastasia Kotanidou, Human Resources Director
3. Vasileia Stergiadou, Human Resources Coordinator

The Management Team for Potential Incidents of Violence and Harassment shall convene to evaluate any relevant incident, either in person or via teleconference, after the Human Resources Director and the Human Resources Coordinator have completed in-person meetings with all involved parties (complainant, accused, witnesses).

The competent Directors, Supervisors, and Department or Team Heads may be requested to assist, as appropriate.

The Management Team for Potential Incidents of Violence and Harassment shall investigate and examine all complaints impartially and with respect for human dignity. It may recommend immediate measures to protect the affected person and shall protect, by all appropriate means, the personal data of both complainants and the accused. It shall also ensure the prohibition of retaliation and prevent further victimization of the affected person. It is also responsible for informing the complainants and, after collecting all necessary information regarding the incident, shall describe in its report the consequences in the event that a violation of the prohibition of violence and harassment is established, in accordance with the provisions of Article 12 of Law 4808/2021 and Article 15 of Law 4808/2021. It shall cooperate, if requested, with the competent authorities and provide them with all relevant information. If no violation of the prohibition of violence and harassment is established, the complainant shall be informed in writing of the findings of the report of the Management Team for Potential Incidents of Violence and Harassment.

In any case, the members of the Management Team for Potential Incidents of Violence and Harassment are committed to maintaining confidentiality and protecting the Personal Data collected while exercising the above duties.

5.10 Investigation and examination of complaints with impartiality and protection of the confidentiality and personal data of victims and the accused

The Human Resources Department and every competent person of Anatolia are committed to receiving, not obstructing the receipt of, investigating, and handling any such complaint immediately; examining the reported matters with impartiality and respect for human dignity; and taking immediate measures to protect the affected person.

In any case, the above persons or departments are committed to maintaining confidentiality and protecting the Personal Data collected while exercising the above duties.

All grievances/reports/complaints shall be investigated promptly and thoroughly. In every case, appropriate organizational measures are taken to secure the above information and ensure confidentiality. Respect for the principles of confidentiality and the protection of personal data is essential. The follows secure procedures for exchanging information between involved employees/interested parties. Data protection and secrecy apply to all work and investigations carried out under this policy and continue even after their completion. The applicable legislation on privacy and personal data protection is strictly adhered to.

5.11 Prohibition of retaliation against the affected person

In any case, Anatolia commits to prohibiting retaliation, in accordance with Article 13 of Law 4808/2021 and the applicable provisions of labor legislation in force. Specifically, the termination or dissolution in any way of the legal relationship on which the employment is based is prohibited and null and void, as is any other adverse treatment of the affected person, insofar as it constitutes retaliatory behavior or a reprisal within the meaning of Article 14 of Law 3896/2010, in connection with an incident of violence and harassment.

5.12 Consequences upon establishment of violations

When the investigation carried out shows that an employee or person engaged in any other capacity has violated the prohibition of violence and harassment, the organization takes the necessary, appropriate, and proportionate measures on a case-by-case basis against the reported person, in order to prevent and ensure that a similar incident or behavior does not recur.

Such measures may include:

- A compliance directive, change of position, working hours, place, or manner of work of the reported person.
- Initiation of disciplinary proceedings and the imposition of disciplinary sanctions.

Specifically, for violations of this policy, one of the following disciplinary penalties shall be imposed by the Administration of the organization, through its authorized bodies, depending on the severity of the offense:

- Oral or written warning.
- Reprimand.
- Termination of the employment or collaboration relationship.

5.13 Cooperation and provision of all relevant information to the competent authorities, upon request

Anatolia, as well as any competent person or department responsible for receiving and handling such complaints at the organizational level, cooperate with any competent public, administrative, or judicial authority which, either on its own initiative or following a request submitted by the affected person, within the framework of its competence, requests the provision of data or information, and they commit to providing assistance and access to such data (paragraph 1 of Article 5 of Law 4808/2021). To this end, any data they collect, in any form, shall be kept in a relevant file, in compliance with the provisions of Law 4624/2019.