

## Policy on the Prevention and Combating of Violence and Harassment at Work & Internal Complaints Handling Procedure

*English translation. In case of any discrepancy, the Greek version prevails.*

### Document details

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| <b>Title</b>                     | Policy on the Prevention and Combating of Violence and Harassment at Work and Internal Complaints Handling Procedure                                                 |
| <b>Document code</b>             | [●]                                                                                                                                                                  |
| <b>Version</b>                   | 2.0                                                                                                                                                                  |
| <b>Approval / effective date</b> | 25.09.2026                                                                                                                                                           |
| <b>Approved by</b>               | Board of Directors                                                                                                                                                   |
| <b>Document owner</b>            | Human Resources Director                                                                                                                                             |
| <b>Classification</b>            | Public – posted at the workplace and on the website                                                                                                                  |
| <b>Legal framework</b>           | Labour Law Code (P.D. 62/2025, Gov. Gazette A' 121), Articles 58–69; Ministerial Decision 95/2026 (Gov. Gazette B' 1); GDPR (EU) 2016/679 and Law 4624/2019          |
| <b>Related documents</b>         | Internal Work Regulations; Code of Ethics & Conduct; Occupational Risk Assessment (ISO 45001); Whistleblowing Policy (Law 4990/2022); Artificial Intelligence Policy |
| <b>Next review</b>               | (at least annually)                                                                                                                                                  |

### Revision history

| Version | Date       | Description of changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Approval |
|---------|------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| 1.0     | 31.12.2025 | Initial version, in accordance with Articles 9 and 10 of Law 4808/2021 and Ministerial Decision 82063/2021.                                                                                                                                                                                                                                                                                                                                                                                                   | Yes      |
| 2.0     | 25.09.2026 | Update in accordance with Ministerial Decision 95/2026: new legal references; risk assessment based on activity and job positions; scope (construction sites, travel, digital communications, third parties, branches); obligations of managers; alternate contact person and anonymous complaints; investigation stages and deadlines; records and personal data; digital harassment and artificial intelligence tools; details of competent authorities; amendment procedure; standardised document format. | Yes      |

## Chapter A – Introduction – Scope – Definitions

1. The company under the corporate name «**ΣΑΛΦΟ ΚΑΙ ΣΥΝΕΡΓΑΤΕΣ ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ - ΣΥΜΒΟΥΛΟΙ ΔΙΑΧΕΙΡΙΣΗΣ ΚΑΙ ΤΕΧΝΙΚΩΝ ΕΡΓΩΝ**» (SALFO & Associates S.A. – Management and Technical Works Consultants), General Commercial Registry (G.E.MI.) No. 117037201000 (hereinafter “**SALFO**”), complies with all measures and obligations arising from Articles 58 to 69 of the Labour Law Code (Presidential Decree 62/2025, Government Gazette A’ 121), as in force, for the prevention and handling of all forms of violence and harassment in the workplace, including gender-based violence and harassment and sexual harassment.

The purpose 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. SALFO expressly declares that it recognises and respects the right of every employee to a working environment free from violence and harassment and that it does not tolerate any such conduct, in whatever form and by whomever it is committed.

This policy is adopted in accordance with Article 62 of the Labour Law Code and Decision No. 95/2026 of the Minister of Labour and Social Security (Government Gazette B’ 1), and covers the persons referred to in Article 59(1) of the Labour Law Code. In particular, it applies to all employees and workers of SALFO, regardless of their contractual status, including persons engaged under works contracts, independent services contracts or salaried mandates, persons engaged through third-party service providers, persons in training, including interns and apprentices, volunteers, workers whose employment relationship has ended, job applicants, and workers in the informal economy.

The policy covers every incident that occurs in the course of work, is linked to it or arises out of it, in particular: at SALFO’s offices; on construction sites, at the premises of clients, contractors and partners and at any other place where work is performed; during business travel, meetings, training and events, in Greece and abroad; in accommodation provided by SALFO; when commuting to and from work; and in work-related communications, including those by email, instant messaging applications, social media and video conferencing, as well as during teleworking.

The policy also covers conduct by third parties, such as clients, contractors, subcontractors, suppliers and visitors, towards persons covered by it, as well as conduct of such persons towards third parties in the context of work.

The policy applies to SALFO and its branches in Greece. It applies mutatis mutandis to SALFO's branches abroad, subject to the mandatory provisions of local law. The subsidiaries of the Group adopt an equivalent policy, consistent with this policy and with the law of their country.

2. For the purposes of this policy, the following definitions apply:
  - (a) **“violence and harassment”** means forms of conduct, acts, practices or threats thereof, whether occurring once or repeatedly, that aim at, result in or are likely to result in physical, psychological, sexual or economic harm;
  - (b) **“harassment”** means forms of conduct that have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not they constitute a form of discrimination, and includes harassment on grounds of sex or other grounds of discrimination;
  - (c) **“gender-based harassment”** means forms of conduct related to the sex of a person that have the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct includes sexual harassment (as defined below), as well as conduct related to the sexual orientation, gender expression, gender identity or sex characteristics of the person;
  - (d) **“sexual harassment”** means any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating the personality of a person, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment around that person.
3. Any form of violence and harassment occurring in the course of work, linked to it or arising out of it is prohibited, including violence and harassment on grounds of sex, religion, race or sexual orientation, and sexual harassment. By way of example, the following are strictly prohibited, among others: (a) comments containing expressions of a sexual nature or other malicious comments, when addressed to persons who have not expressly indicated that they wish to receive such comments; (b) comments or persistent questions about a person's appearance, sex, religion, race or sexual orientation that cause embarrassment or discomfort; (c) circulating and/or displaying material of a sexual nature or any other content offensive to human personality or dignity (e.g. photographic, digital or printed); (d) unwanted comments with sexual innuendo; (e) sending messages with sexual content; (f) sexual gestures or acts (e.g. any unwanted physical contact aimed at assault or at pressure

to engage in sexual relations); (g) persistent requests for dates; (h) threats or insinuations that sexual favours may advance a person's career, or that refusing a sexual relationship may adversely affect their career at the company; (i) use of obscene, threatening or offensive language, including cyberbullying; (j) obscene, threatening, violent or offensive gestures; (k) forcing sexual embraces or contact; (l) belittling or ridiculing a person or their abilities, whether in private or in front of others; (m) creating, altering or disseminating photographs, video, audio or other content concerning a person without their consent, including content generated or modified with artificial intelligence tools (e.g. "deepfakes"), with the purpose or effect of violating their dignity.

## **Chapter B – Prevention and Combating of Violence and Harassment at Work**

4. **Assessment of the risks of violence and harassment at work.** SALFO identifies and assesses the risks of violence and harassment, taking into account the nature of its activity as an engineering design and technical works consultancy, the job positions, and factors such as sex, age or other characteristics that constitute grounds of discrimination. The assessment forms part of SALFO's written occupational risk assessment (Article 534(1)(a) of the Labour Law Code) and of its ISO 45001 occupational health and safety management system, and is reviewed at least annually. The following are assessed, in particular, as situations of increased risk:

- (a) work on construction sites and at the premises of clients or contractors, where staff work alongside persons who are not under SALFO's managerial authority;
- (b) supervision and inspection of third-party works, where tensions, pressure or threats may arise;
- (c) lone working on construction sites or at remote locations;
- (d) business travel and secondments, in particular to countries with a different legal and cultural environment;
- (e) teleworking and digital communications, including the use of artificial intelligence tools to generate or alter content;
- (f) hierarchical relationships and relationships of dependence, in particular for new hires, interns, apprentices and persons on fixed-term or works contracts;
- (g) periods of increased workload and tight project delivery deadlines.

The risks arising from incidents of violence and harassment for employees may include, by way of example and without limitation:

- (a) violation of human dignity and non-pecuniary harm;

- (b) feelings of anxiety, stress, fear, insecurity or anger in the performance of work;
- (c) psychosomatic symptoms, such as headaches, tachycardia, increased blood pressure, sleep disorders, fatigue and reduced concentration;
- (d) adverse effects on the employee's work performance, engagement and general well-being.

At the same time, for SALFO itself, the occurrence or improper handling of such incidents may result in:

- (a) disruption of working relationships and of the internal cohesion of the workforce;
- (b) reduced productivity and quality of the services provided;
- (c) legal, administrative and financial consequences, including sanctions and claims;
- (d) damage to reputation and corporate image, and negative publicity.

5. **Measures for the prevention, control, mitigation and handling of the risks of violence and harassment at work – Monitoring of incidents.** SALFO takes all necessary and appropriate measures and applies suitable administrative, organisational and technical practices for the prevention, control, mitigation and handling of the risks of violence and harassment at work, as well as for the effective monitoring and management of relevant incidents or conduct, guided by respect for human dignity and the safeguarding of a safe and healthy working environment.

By way of example and without limitation, these measures and practices include:

- (a) Encouraging a healthy working climate in which respect for human dignity, cooperation and mutual support are fundamental values.
- (b) Promoting open and honest communication between employees, the employer, line managers and colleagues.
- (c) Establishing and applying a clear, accessible and effective procedure for submitting, receiving and handling reports or complaints of violence and harassment (Chapter C).
- (d) Ensuring that employees have the necessary training and information to perform their duties, in particular in positions with an increased risk of violence or harassment.
- (e) Adopting technical measures, such as emergency alert systems, adequate and appropriate lighting of workplaces and any other suitable technical measure.
- (f) Carrying out awareness-raising actions for employees on healthy patterns of behaviour (e.g. avoidance of addictions), as well as information actions on matters concerning vulnerable categories of employees.

- (g) Providing guidance and support to victims of violence and harassment or of domestic violence, with a view to maintaining their employment and ensuring their smooth reintegration into the working environment.
- (h) Training employees in the procedures for preventing, recognising and handling incidents of violence and harassment.
- (i) Regularly assessing the effectiveness of the preventive and corrective measures applied, and reviewing and updating the assessment of the relevant risks and of the measures to address them.
- (j) Including, in contracts with contractors, subcontractors and partners, terms requiring respect for this policy in their cooperation with SALFO.
- (k) Training managers exercising managerial authority in recognising and promptly addressing incidents of violence and harassment.

**6. Information and awareness-raising actions for staff on violence and harassment.**

SALFO declares its zero tolerance of violence and harassment and takes the following actions to raise the awareness of its staff:

- (a) through this policy, it provides its staff, in accessible formats, with information on the risks of violence and harassment, on the related prevention and protection measures, on the procedures in place within the company and on the options available under the law in the event of such incidents;
- (b) it may organise targeted staff meetings to discuss relevant issues and to address potential risks in good time;
- (c) it may hold seminars with mental health professionals, counselling service providers, etc.;
- (d) it encourages employees and management to take part in training programmes and seminars on recognising and managing the risks of violence and harassment at work;
- (e) it includes information on this policy in the onboarding of new hires and provides periodic training to managers exercising managerial authority.

**7. Information on the rights and obligations of employees and of SALFO in the event of the occurrence, report or complaint of incidents of violence and harassment.**

A person affected by an incident of violence and harassment has, cumulatively or alternatively, the following rights:

- (a) The right to judicial protection, in accordance with applicable law.
- (b) The right to appeal, file a complaint or request the resolution of a labour dispute before the Labour Inspectorate, within the scope of its statutory powers.

- (c) The right to submit a report to the Greek Ombudsman, within the scope of its powers as the body responsible for promoting and monitoring the principle of equal treatment.
- (d) The right to submit a report or complaint within SALFO, in accordance with the complaints handling procedure set out in Chapter C of this policy.

The exercise of any of the above rights does not exclude or limit the exercise of any other right of the affected person before any competent authority.

Persons exercising managerial authority or representing SALFO must, to the extent of their responsibility: (a) promote, through their own conduct, a working environment of respect; (b) intervene immediately when they become aware of conduct that may constitute violence or harassment; (c) inform the Liaison Officer or the competent persons under Chapter C without delay of any incident that comes to their attention, respecting confidentiality; (d) not discourage the submission of reports or complaints and not engage in retaliation. All employees must comply with this policy, cooperate in good faith in the investigation of complaints and keep confidential any information that comes to their knowledge in that context.

Any person covered by this policy who is subjected to an incident of violence or harassment has the right to leave the workplace for a reasonable period, without loss of pay or any other adverse consequence, if, in their reasonable belief, there is an imminent serious risk to their life, health or safety. In that case, the person leaving must first inform SALFO's designated Liaison Officer in writing, describing the incident and the facts on which their belief in the existence of a serious risk is based. If the risk does not exist or has ceased to exist and the affected person refuses to return to the workplace, SALFO may refer the dispute to the Labour Inspectorate for resolution, in accordance with Article 570 of the Labour Law Code, as in force.

Every affected person has the right to apply, among others, to the following competent authorities:

**(a) Labour Inspectorate**

Online submission of complaints: <https://apps.sepenet.gr/portal/login> or in person at the competent Labour Inspectorate Department

Citizen service and complaints line: **1555**

**(b) Greek Ombudsman**

Address: 17 Chalkokondyli Street, 104 32 Athens

Submission of reports: [www.synigoros.gr](http://www.synigoros.gr)

Tel.: (+30) 213 1306 600

**(c) SOS helpline for women victims of gender-based violence**

Tel.: 15900

Non-compliance with this policy and conduct constituting violence or harassment entail the relevant consequences within the employment or cooperation relationship, as set out in Chapter C of this policy and in applicable law.

8. **Designation of a Contact Person (“Liaison Officer”).** The Human Resources Director, Mr Konstantinos Efthymiou (tel.: 6979795066, email: kefthimiou@salfo.gr), is designated as the contact person (“**Liaison Officer**”) for the purposes of this policy. In that capacity, the Liaison Officer is responsible for guiding, informing and supporting all persons covered by this policy on the prevention and handling of incidents of violence and harassment at work, whether they approach him in connection with a specific incident or complaint or for general information. The Liaison Officer acts in accordance with the principles of confidentiality, objectivity, impartiality and protection of human dignity; informing the company’s Management of relevant matters is at his discretion, taking into account the seriousness and nature of each case. The Liaison Officer must also ensure the protection of any personal data that comes to his knowledge in the performance of his duties, in accordance with applicable law and the company’s internal policies.
9. **Protection of employment and support for employees who are victims of domestic violence.** Upon the request of an employee who is a victim of domestic violence, SALFO may consider, on a case-by-case basis and with full respect for privacy and confidentiality, any appropriate and reasonable measure or adjustment, taking into account: the nature and requirements of the employee’s duties, SALFO’s organisational and operational capabilities, and the particular needs arising from the employee’s personal and family situation. These measures aim to preserve employment, ensure continuity of work and facilitate the employee’s smooth reintegration into the working environment, in particular where there are minor children or children with disabilities or serious illnesses. By way of example and without limitation, support measures may include: flexible forms of work or working arrangements (such as adjusted working hours, teleworking or a temporary change of duties), reasonable time off in accordance with applicable law, and any other appropriate organisational adjustment that is deemed necessary and feasible.

**Chapter C – Procedure for Receiving and Examining Complaints**

10. **Contact details for the submission of complaints.** The Human Resources Director (the “**Liaison Officer**”) is designated as the person responsible for receiving, examining and handling complaints or grievances of affected persons concerning conduct constituting

violence or harassment. Complaints or grievances may be submitted to the Liaison Officer orally (in person or by telephone at 6979795066) or in writing by email to [kefthimiou@salfo.gr](mailto:kefthimiou@salfo.gr). Alternatively, complaints may be submitted to the Legal Counsel / Compliance Officer, Ms Maria Psarra (tel.: 2107256047 / email: [mpsarra@vglawyers.gr](mailto:mpsarra@vglawyers.gr)), in particular where the complaint concerns the Human Resources Director or a person with whom he has a relationship giving rise to a conflict of interest. In that case, the alternate person exercises all the powers under this Chapter. Anonymous complaints are also accepted and are examined provided they contain sufficient information to allow an investigation. The competent persons inform the complainant that they may, at any stage, also apply to the competent administrative or judicial authorities.

11. SALFO and the designated contact person (“Liaison Officer”) undertake to receive, and in no case to obstruct the receipt of, and to investigate and handle promptly, every report or complaint concerning an incident of violence or harassment at work. The investigation is carried out impartially, objectively and confidentially, with full respect for the human dignity of all parties involved, and with every necessary and appropriate measure being taken for the immediate protection of the affected person. SALFO and the Liaison Officer undertake to maintain strict confidentiality and to protect the personal data collected in the handling and investigation of complaints, in accordance with the GDPR, national law and the company’s internal policies.
12. **Investigation procedure.** The investigation of complaints generally follows these stages:
  - (a) acknowledgement of receipt of the complaint to the complainant within five (5) working days;
  - (b) consideration of the need for immediate measures to protect the affected person, such as a temporary change of position, working hours or place of work or avoidance of contact between the persons involved, without any adverse consequence for the affected person;
  - (c) hearing of the complainant and of the person complained against, who is informed of the allegations and given the opportunity to present their views, as well as of witnesses;
  - (d) collection of evidence, including, where necessary and lawful, access to relevant SALFO records and electronic communications;
  - (e) preparation of findings and notification of the outcome to the complainant and to the person complained against, generally within [thirty (30)] days of receipt of the complaint, with the possibility of extension in complex cases and corresponding notice to the complainant. Anyone involved in the investigation who has a conflict of interest must abstain from it. In cases of particular seriousness or complexity, SALFO may assign the investigation to an external, independent adviser.
13. **Records and personal data.** The information relating to each complaint is kept in a separate, confidential file, accessible only to the competent persons and protected by the

technical and organisational measures of SALFO's information security management system (ISO 27001), in accordance with the GDPR and Law 4624/2019. The information is retained for five (5) years from the completion of the procedure or, where judicial or administrative proceedings are pending, until their final conclusion. Entering complaint information into artificial intelligence tools that have not been expressly approved by SALFO for that purpose is prohibited, and no decision on a complaint is taken solely on the basis of automated processing.

14. SALFO expressly undertakes to comply with the **prohibition of any form of retaliation** against affected persons, in accordance with Article 66 of the Labour Law Code and the provisions of labour law in general. SALFO extends the same protection to witnesses and to anyone who assists in good faith in the investigation of a complaint.
15. Where it is established that an employee or a person engaged by SALFO under any other relationship has breached the prohibition of violence and harassment, SALFO takes against that person the necessary, appropriate and proportionate measures in each case, with a view to immediately ending the unlawful conduct, preventing its recurrence and restoring peace in the workplace (Article 65(2) of the Labour Law Code).

These measures may include, by way of example and without limitation:

- (a) a recommendation to comply or a written warning;
- (b) disciplinary sanctions, in accordance with the relevant provisions of the Internal Work Regulations and/or the Company's Code of Ethics & Conduct, as in force from time to time;
- (c) a change of position, working hours, place or manner of work, on a temporary or permanent basis;
- (d) termination of the employment or cooperation relationship, subject to the principle of proportionality and to the prohibition of abuse of rights under Article 281 of the Greek Civil Code.

Where the breach is committed by a third party, such as a client, contractor, subcontractor or visitor, SALFO takes every appropriate measure to protect the affected person, such as informing the third party's employer, requesting the third party's removal from the project or the workplace, and exercising its contractual rights.

Furthermore, where a complaint is found, following an objective and substantiated investigation, to have been made **maliciously**, i.e. in the knowledge that the facts alleged are untrue, SALFO reserves the right to take any lawful measure against the complainant within the framework of the employment or cooperation contract and applicable law. A

complaint made in good faith does not entail any adverse consequence for the complainant, even if it is not substantiated.

16. SALFO, the designated Liaison Officer and any other competent person involved in receiving, investigating and handling complaints of violence or harassment cooperate fully with any competent public, administrative or judicial authority that, either on its own initiative or at the request of an affected person and within the scope of its statutory powers, requests information or documents.

## **Chapter D – Final Provisions**

This policy is communicated to all SALFO employees by any appropriate means, posted at the company's workplaces and on its notice board, and published on its official website.

This policy may be updated at any time at SALFO's discretion, in particular in the event of changes to the applicable legislative or regulatory framework or to the details of the competent persons. Any amendment to the text of the policy is adopted following consultation with, and information of, the employees or their representatives, in accordance with Article 2 of Ministerial Decision 95/2026, and is recorded in the Revision History. A change limited to the details of the competent persons is communicated to employees and posted as set out above.

**The policy is reviewed at least annually and is incorporated into SALFO's Internal Work Regulations. This version applies from 25.09.2026 and supersedes all previous versions.**