



POLICY ON PREVENTING AND ADDRESSING WORKPLACE HARASSMENT

GROUP HUMAN RESOURCES DIVISION
ENTRY INTO FORCE:30.11.2021
ΚΩΔΙΚΟΣ ΕΓΓΡΑΦΟΥ: GR.ELL.HRD.PL.v1-11.21

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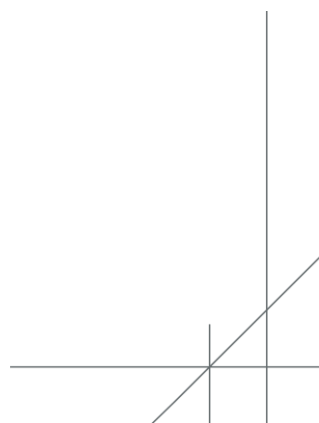
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INTRODUCTION

This Policy has been developed in order to safeguard fair behavior in any and all of our transactions and relations, wishing to ensure a workplace environment which promotes respect to human dignity and does not allow discrimination against employees due to their personal traits and choices

OBJECTIVE

The objective of this Policy is to create and establish a work environment which respects, encourages and safeguards human dignity and everyone's right to a workplace free from violence and harassment.

The Company has zero tolerance to any kind of violence or harassment at the workplace and sets the preconditions for effectively preventing and addressing all forms of violence and harassment, including gender-related violence and sexual harassment, for the purpose of preventing, to the extent possible, any future recurrence.

Specifically, this Policy aims at: (a) establishing compliance with the applicable legal and regulatory framework, including in particular Law no. 4808/2021, as in force, for protecting employees and other individuals in the Company from incidents of violence and harassment that may occur either during or in relation with work, (b) making the definition of violence and harassment understandable, (c) encouraging confidential reporting of incidents and (d) raising employees' and partners' awareness and vigilance in order to identify acts pertaining to violence and harassment at the workplace.

RELATED POLICIES

This Policy should be read in conjunction with the Code of Ethics, the Whistleblowing Policy, the Human Rights Policy and the Data Protection Policy.

DEFINITIONS

"Company" shall mean the company "ELLAKTOR SA".

"Group" shall mean the holding group of "ELLAKTOR SA", that is, the Company and the entities it controls ("subsidiaries").

"Policy" shall mean the Policy on Preventing and Addressing Workplace Harassment.

SCOPE

This Policy applies to all Group companies, including those based abroad and is binding for (i) the members of the Board of Directors (BoD), ii) the persons who carry out managerial duties in the Group companies and (iii) the remaining Group personnel.

When a Group company participates in a Joint Venture which is not controlled by the Group and / or in subsidiaries with a share (both direct and indirect) less than 100%, partners are informed about this Policy and are urged to comply with its requirements and adopt equivalent policies, if they have not already done so.

DEFINITION OF HARASSMENT

Within the framework of this Policy, the following definitions shall apply:

“Violence and harassment” shall mean the forms of behavior, acts, practices or threats thereof which intend, lead or might lead to physical, psychological, sexual or economic damage, occurring either individually or repeatedly.

“Discrimination” shall mean any discrimination due to gender, race, color, ethnic origin, social class, genetic traits, language, religion or beliefs, political views, disability or health condition, age or sexual orientation.

“Harassment” shall mean any form of behavior which intends or leads to violation of human dignity and to the creation of an intimidating, hostile, humiliating, degrading or aggressive environment, regardless whether such behavior is a form of discrimination or not, including harassment based on gender or on any other discriminating ground.

“Gender-based harassment” or “gender-based violence and harassment” shall mean such forms of behavior related to a person’s gender, which intend or lead to the violation of human dignity and the creation of an intimidating, hostile, humiliating, degrading or aggressive environment. Such forms of behavior include sexual harassment, as well as forms of behavior pertaining to the individual’s sexual orientation, gender expression, identity or characteristics.

REPORTING, INVESTIGATION AND MANAGEMENT OF COMPLAINTS

The Company applies appropriate mechanisms and procedures in order to inform, regularly train and raise employees’ awareness on the content of this Policy, as well as on their arising rights and obligations, making sure that there is no person without knowing where to address in case of an incident of violence or harassment.

Employer’s Obligations

The Company shall ensure that:

- all the reasonable preventive measures are taken for the protection of employees and other individuals in the Company against violence and harassment at the workplace;
- measures are in place for preventing, controlling, limiting and addressing risks of violence and harassment at the workplace;
- risk assessment is conducted with regard to violence and harassment at the workplace;
- employees are informed about assessment results;
- procedures, policies and regulations at the workplace are well in place for eradicating the risk of having employees exposed to violence;
- all employees are well-trained on this Policy.

Any Company employee or any third party who is anyhow related to a Company employee and believes that they have been subjected to discriminatory treatment, violence or any form of harassment or has realized that such a behavior occurs at the workplace, shall have to make a report pursuant to the WhistleBlowing Policy (<https://ellaktor.com/en/compliance-management-system/>) that our Company has adopted for further investigating and addressing the incident.

Management of Reports

The Company provides distinct channels for reporting incidents of violence or harassment, in a safe and simple manner. Reports may be submitted in confidentiality or full anonymity. All reports shall be treated with respect, confidentiality and without the fear of retaliation against the person reporting a harassment-related incident or behavior. The Company operates on a zero-tolerance basis towards retaliation.

The Company has all the necessary measures in place for maintaining the confidentiality and protecting the personal data of an individual and of the information that they have reported, by disclosing their identity only when required by law or when such disclosure is inevitable for the carrying-out of an effective research and for taking the necessary measures. Furthermore, the Company is committed to provide cooperation and all related information to any competent authority, either administrative or judicial, if requested so, for the investigation of a violence and harassment incident.

All reports shall be investigated promptly, thoroughly and impartially, whereas the individuals who have made a report shall be informed about its acceptance and progress, pursuant to the provisions of the Whistleblowing Policy.

Whenever a report is submitted and, in all cases involving incidents of violence or harassment, depending, of course, on the nature and the gravity thereof, the Human Resources Department shall collect further information and, as the case may be, proceed to a discussion over the facts with the person involved in order to clarify the situation. Next, in cooperation with the Compliance Department and the support of the Legal Service, it shall assess whether such situation is substantial and whether it could have any influence on Company activities.

In any case, the Company ensures that the final decision shall be made on transparent and unbiased evidence.

The Company reserves the right to transfer employees or to amend their work shifts when a research result is pending, as provided for by the applicable legislation. In the meantime, partial or full access to buildings and/or facilities may be prohibited. When, after the research, an incident of discriminatory treatment, violence, harassment or retaliation is confirmed, the Company shall proceed to all appropriate corrective, disciplinary or other actions against the violator. Such actions shall include but not be limited to (a) disciplinary sanctions, (b) change in position, work shift, place or type of working, (c) termination of employment or partnership contract, (d) litigation. In any case, violators may also incur criminal or civil liability, according to the applicable legal provisions.

This Policy shall apply in parallel to the applicable general legislation on the protection of employees' personality and does not affect their legal rights on the basis of civil and criminal law. Furthermore, in addition to judicial protection, they are entitled to resort to the Hellenic Labor Inspectorate (in Greek "*SEPE*") and the Greek Ombudsman, being the institution responsible for promoting and supervising the principle of equal treatment.

The Company shall make sure the protection of employment and the support of employees who have been victims of domestic violence. To this end and on a case-by-case basis, appropriate measures shall be taken and such employees shall be respectively facilitated.

Reference Person

The Chief Human Resources Officer shall be responsible as the reference person ("Liaison"), to guide and inform Company Employees on the measures taken to prevent and address violence and harassment at the workplace.

MONITORING OF THE POLICY

The Policy on Preventing and Addressing Workplace Harassment shall be reviewed on a yearly basis or as may be otherwise necessary. The Chief Human Resources Officer shall be responsible for preparing and suggesting revisions of this Policy.

