

# **ZILLION'S**

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

January 2024

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

### **1. SCOPE AND PURPOSE OF THE POLICY**

The Company «**ZILLION'S ICE CREAM BAR**» with registered seat at Kifissia (69 Dionysou street) with GEMH No. 86725202000 and TIN 998967752 of DOY Kifissia (hereinafter the “**Company**”) adopts this Policy in accordance with the provisions of Law 4808/2021 (Government Gazette 101/A/19-6-2021) and Decision 82063/2021 (Government Gazette 5059/B/1-11-2021) and abides with all the measures and obligations under Part II of Law 4808/2021 for the prevention and combat of violence and harassment at work, including gender-based violence and harassment and sexual harassment that occurs in the course of work.

The Company is committed to operating in accordance with the rules of ethics and the applicable legal and regulatory framework for the protection of labor, seeking to maintain high standards of professional and ethical conduct.

The persons covered by the protection are workers and employees, regardless of their contractual status, as well as persons undergoing training, including trainees and apprentices, as well as workers whose employment relationship has ended and persons applying for employment.

This Policy applies to incidents of violence and harassment, including gender-based violence and harassment and sexual harassment, which are caused in the course of work, whether related to or arising from work and occur: a) in the Company's workplaces and in any other place where employees are present in the course of their work, b) during their travel to and from the workplace, other travel, as well as at events and social activities (corporate events, seminars, work travel) and c) any correspondence exchanged during work (including such conducted through technology channels (email, sms etc).

The purpose of this Policy is to create and establish a violence and harassment-free work environment that respects, promotes and safeguards human dignity and protects the rights of every person from abusive and violent behavior.

### **2. DEFINITIONS/EXAMPLES**

**"Violence and harassment"** mean those forms of conduct, acts, practices or threats thereof, which are intended to cause, result in or are likely to result in physical, psychological, economic or sexual harm, whether occurring in isolation or repeatedly.

**"Workplace Violence"** is any incident of abuse, threat or assault on a person in the workplace during the performance of work duties. Indicatively, it may include physical assault, aggressive behavior, threats, verbal abuse, incidents involving anger, insulting, undue reinforcement of psychosocial risks. These are behaviors that constitute physical and psychological abuse, that cause physical or mental pain, diminish the personality, dignity and integrity of the employee.

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**"Harassment"** means any form of conduct that has the purpose or effect of violating the dignity of a person and of creating an intimidating, degrading, humiliating, hostile, degrading, or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment on the grounds of sex or other grounds of discrimination.

**"Gender-based harassment"** means forms of conduct related to the gender of a person which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, degrading or offensive environment. These forms of conduct include sexual harassment, as well as forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics.

**"Sexual harassment" is** defined as any form of unwanted verbal, psychological, or physical conduct of a sexual nature that results in the violation of a person's personality, in particular by creating an intimidating, hostile, degrading, humiliating, humiliating or hostile environment around that person. These are behaviors with a sexual tone or innuendo, manifested in actions or words, which are unpleasant and offensive to a person. They do not have to be repeated behaviors, as long as they are also an isolated incident.

**Examples of violence and harassment** include but are not limited to the following:

- Obscene gestures, touching and any kind of unwanted physical contact,
- Exposure of body parts for the purpose of sexual arousal,
- Sexual comments or innuendos or suggestions or questioning,
- Unwanted proposals aimed at sexual intercourse,
- Unwanted intimacy,
- Sexual or immoral or offensive comments,
- Moderating discussions on sexual issues,
- Describing sexual activity in front of other people without their consent
- Indiscriminate questions about personal or sex life,
- Obscene remarks,
- Annoying flirting and constant/persistent suggestions for social activity outside the workplace, when it has been made clear that these suggestions are unwelcome,
- Displaying offensive or obscene material (printed or electronic e.g. pictures, objects, etc.) ,
- Whistles,
- Unnecessary very close physical distance,
- Unsolicited messages with sexual or threatening or offensive content via SMS, e-mail, social media, fax, letter, telephone communication,
- Mocking, obscene or sexually or racially offensive comments directed against minority groups.
- Using offensive language, describing or making fun of someone with a disability.
- Comments about someone's appearance or character that cause embarrassment or shame.
- Disseminating malicious comments or insulting someone (especially because of discrimination on the grounds of age, race, health, gender reassignment, type of marriage, civil partnership, pregnancy and maternity, sex, any disability, sexual preference, religion or belief).
- Verbal or gestural threats, such as shouting or swearing - in public or in private - at

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- staff or colleagues.
- Belittling or ridiculing a person or his/her abilities, either in person or in the presence of others.
- Outbursts of anger against someone or a group for trivial reasons.
- Offensive and unjustified questions about someone's marital status, personal life, health, sexual interests or preferences, and similar questions about someone's race or ethnicity, including their cultural identity and religion.
- Unwelcome, sexual gestures or persistent requests for private, non-work-related meetings.
- The systematic and abusive exercise of managerial discretion against a specific person or persons in respect of incidents falling within the scope of this Policy.
- Exploiting a position of authority that provides a hierarchically superior position for one's own sexual benefit, such as the case where a supervisor demands favors of a sexual nature in exchange for better working conditions, promotions, salary increase, etc,
- Retaliation or intimidation in case of reporting or threatening to report any harassing behavior.

The above acts are examples and do not constitute an exhaustive list of behaviors that constitute violence and harassment.

Whether an action/behavior is considered violence or harassment is an objective fact and is not influenced by the intentions of the perpetrator.

### **3. ZERO TOLERANCE STATEMENT ON VIOLENCE & TO HARASSMENT**

The Company, through this Policy, declares that it recognizes and respects the right of employees to a work environment free of violence and harassment and that it will not tolerate any such behavior, in any form, by any person.

In this context, incidents of any form of violence and harassment in the workplace are expressly prohibited and the Company is committed to making every effort to address and eliminate them immediately in order to ensure a safe working environment for employees. Therefore, any form of violence, abusive behavior, psychological or physical abuse, intimidation, harassment, including sexual harassment against any employee will not be tolerated by the Company.

### **4. MEASURES TO PREVENT AND RESPOND TO INCIDENTS OF VIOLENCE AND MALICIDE - INFORMATION & AWARENESS RAISING**

The Company complies with all measures and obligations set out in Law 4808/2021 for the prevention and response to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment. In this context, the Company shall ensure the awareness and protection of employees, take all appropriate measures, implement practices and procedures in order to inform employees of this Policy, their rights and the procedures to be taken to deal with incidents of violence and harassment and the management of reports/complaints of the aforementioned incidents. Through this Policy, the Company aims to make employees vigilant in order to understand and recognize violence and harassment behaviors in a timely manner, and to encourage them to report them to its authorized

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representatives, as identified below.

## **4.1 ASSESSMENT OF THE RISKS OF VIOLENCE AND HARASSMENT AT WORK**

The Company identifies risks related to violence and harassment, taking into account, inter alia, any inherent risk arising from the nature of activities, jobs, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks related to specific groups of employees, such as (night workers, new recruits, people with disabilities and people with fixed-term contracts).

## **4.2 MEASURES TO PREVENT, CONTROL, CONTAIN AND RESPOND TO RISKS OF VIOLENCE AND HARASSMENT - MONITORING OF SUCH INCIDENTS OR FORMS OF BEHAVIOUR**

Measures and administrative practices to prevent and control the risks of violence and harassment include:

- Encourage the maintenance of a working climate where respect for human dignity, cooperation and mutual assistance are core values.
- Open communication with the Company and immediate supervisors and colleagues.
- Report/complaint management process.
- Ensuring that employees have the necessary training/information to carry out their duties, particularly in jobs that are at higher risk of violence and harassment incidents.
- Technical measures, such as the installation of emergency alarms, improved lighting, etc.
- Actions to raise awareness among employees of healthy behavioral patterns (e.g. avoiding addictions), but also on issues concerning vulnerable categories of employees.
- Guidance and support for victims of violence and harassment or victims of domestic violence to reintegrate into the workplace.
- Training of employees in the procedures for the management of violent incidents.
- Evaluate on a regular basis the effectiveness of the preventive and mitigation measures in place and review/update the assessment of risks and measures.

## **4.3 STAFF INFORMATION AND AWARENESS-RAISING ACTIVITIES**

The Company undertakes to provide staff with information in accessible formats, as appropriate, on the risks of violence and harassment, as well as on the related prevention and protection measures, on the procedures in place at Company level and on the possibilities provided by law in the event of such incidents, under the auspices of the Administrator.

In particular, the Administrator trains employees to recognize discrimination, violence and harassment at work and to provide the necessary support to its staff and associates.

In particular:

- Organizes targeted staff meetings to discuss relevant issues and address potential risks in a timely manner.
- Encourages the participation of employee representatives and managers in training

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programs and seminars on the identification and management of risks of violence and harassment at work.

The Company encourages its employees and any third party associated with it (such as customers, suppliers) to report incidents of discrimination, violence and harassment in the workplace that come to their attention.

## **4.4 INFORMATION ON THE RIGHTS AND OBLIGATIONS OF EMPLOYEES AND THE COMPANY**

The Company informs staff that, in the event that a person is affected by an incident of violence and harassment upon access to employment, during employment, or even if the contract or employment relationship under which the incident or conduct allegedly occurred has ended, he or she has: (a) the right to judicial protection; (b) an action, a complaint and a request for an employment dispute to the Labor Inspectorate, within the scope of its authority under the law; (c) a report to the Ombudsman, within the scope of its authority under the law; and (d) a complaint within the company, in accordance with the procedure under para. 5 of this Policy. In any case, where a report or complaint of such conduct within the Company arises, the aggrieved person reserves all rights to appeal to any Competent Authority.

The Administrator ensures that employees are fully informed and that the details of the Competent Administrative Authorities (Labor Inspectorate, Citizen's Advocate) to which any aggrieved person has the right to appeal, are posted in conspicuous places (notice boards of all organizational units, intranet), and in particular, it provides information on the SEPE complaints hotline through the 1555 citizens' helpline, as well as on the direct psychological support and counselling service for women victims of gender violence, so that they can contact the SOS 15900 hotline.

When a permanent employee or otherwise employed violates the prohibition of violence and harassment in this Policy, the Company shall take the necessary appropriate and proportionate measures on a case-by-case basis against the accused in order to avoid and prevent a similar incident or conduct from recurring. Such measures may include recommending compliance, changing the position, hours, place or manner of employment, or terminating the employment or partnership relationship, subject to the prohibition against abuse of right in Article 281 of the AK.

Any person who suffers an incident of violence and harassment against him or her shall have the right to leave the workplace for a reasonable period of time, without loss of pay or other adverse consequence, if in his or her reasonable belief there is an imminent serious risk to his or her life, health or safety, in particular, where his immediate superior or other superior is the perpetrator of such conduct, or where he fails to take the above-mentioned appropriate measures to restore peace at work, or where such measures are not sufficient to stop the violent and harassing conduct.

In this case, the dismissed employee must inform the Company in writing beforehand, stating the incident of violence and harassment and the circumstances that justify his/her belief that there is a serious risk to his/her life, health or safety. If the risk does not exist or has ceased to exist and the person who suffers an incident of violence and harassment against him or her refuses to return to the workplace, the Company may appeal to the Labor Inspectorate to request a resolution of the dispute.

In any case, the violation of the prohibition of violence and harassment at work gives rise, among other things, to a claim for full compensation of the aggrieved person, which covers his/her incidental and consequential damage, as well as moral damage.

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Any discriminatory treatment of an aggrieved person is prohibited if it constitutes retaliatory conduct or countermeasure a) on the grounds of gender or marital status, b) when it constitutes retaliatory conduct because of the employee's non-compliance with sexual or other harassment against him/her, c) when it is made as a reaction, protest, complaint, testimony or any other action of an employee person before a court or other authority, which is relevant to the application of this Policy.

## **4.5 DEFINITION OF REPORTING PERSON ("LIAISON")**

**The Company's Reporting Person ("Liaison")** is defined as the person who is responsible for guiding and informing employees to prevent and respond to specific incidents of violence and harassment at work.

The Liaison is designated by the Administrator GEORGIOS ROMANOS The Liaison is authorized by the Company and his/her name and contact details are posted in prominent places (notice boards of all organizational units, intranet) for the information of employees.

His role is to guide and inform employees, in case he is contacted about any incident of violence and harassment. Where his/her assistance is requested, he/she may support the drafting/submission of complaints. The Liaison shall inform the person concerned of the details of the competent administrative authorities to which he or she has the right to appeal. This role is communicated by the Administrator to all employees by e-mail.

The Reporting Person shall be obliged to protect any Personal Data (PD) which may come to his/her knowledge in the course of his/her duties.

## **4.6 PROTECTION OF EMPLOYMENT AND SUPPORT FOR WORKERS WHO ARE VICTIMS OF DOMESTIC VIOLENCE**

The Company takes measures that actively demonstrate its social responsibility towards the phenomenon of domestic violence, such as protecting employment, providing special leave or flexible working arrangements at the request of the employee victim of domestic violence, in order to support him/her in maintaining employment and smooth reintegration after such incidents, especially in cases where there are minor children or children with disabilities or serious illnesses.

## **5. PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS**

### **A. Channels of communication - Competent Persons**

Any person who suffers an incident of violence and harassment against him/her has the right, and if he/she wishes, to contact the Liaison in order to be informed of his/her rights, as well as to be informed of all the options and support available to him/her, both under this Policy and under the applicable legislation, to deal with the incident of violence and harassment suffered. After the incident is reported by the aggrieved party, the Liaison shall take the appropriate steps to investigate the incident and initiate a relevant Administrative Inquiry at the Company's Administrator, in accordance with the procedures set out in the provisions of the relevant legislation.

In any case in which any employee becomes the victim of violence or harassment within the

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workplace or becomes aware of such behavior towards a third employee within the work environment, he/she has the right to file a complaint, either eponymous or anonymous, directly with the Company's Administrator.

The Company's Administrator has the obligation to immediately inform of any complaint of an incident of violence and harassment, to immediately initiate the investigation, examination and management of the aforementioned complaint, subject to this Policy and the provisions of the applicable legislation.

Persons filing reports/complaints will be promptly informed of the receipt of the report/complaint, as well as periodically informed of the progress of its investigation, by the Company's Administrator.

## B. Investigation and examination of complaints

The Company's Administrator is committed to receiving, investigating and examining any complaint or related report, demonstrating the Company's zero tolerance of violence and harassment, with full respect for the rights of the employee and taking all necessary measures to ensure the confidentiality of the entire process and the protection of the employee's personal data.

When investigating and examining complaints, the persons authorized by the Company must handle them with impartiality and protection of the confidentiality and personal data of the victims and the accused. The Administrator will promptly and thoroughly investigate the complaint in a fair and impartial manner, taking into account all the evidence gathered during the investigation, with the aim of reaching reasonable conclusions as to whether an incident of violence or harassment occurred within the workplace and to impose the appropriate sanctions.

If the investigation that is carried out reveals that the complaint was ultimately malicious and no incident of violence or harassment took place, the motives for the malicious complaint will be investigated and the appropriate disciplinary sanctions will be imposed in accordance with applicable law.

## C. Prohibition of retaliation and further victimization against the aggrieved person.

It is prohibited and invalid to terminate or in any way dissolve the legal relationship on which the employment is based, as well as any other unfavorable treatment of the person affected, if it constitutes retaliatory behavior or a countermeasure for incidents of violence and harassment.

It is expressly stated that retaliation against the complainant is strictly prohibited, and the disciplinary sanctions provided for will be imposed in accordance with the applicable legislation.

## D. Consequences upon finding violations.

In the event of a violation of the prohibition against violence and harassment, the Company shall take appropriate and proportionate action, as appropriate, against the accused person in order to prevent and prevent a similar incident or conduct from recurring. Such measures may include recommending compliance, changing the position, hours, place or manner of work, or terminating the employment or partnership relationship, subject to the prohibition of abuse of right.

In any case, the violator may also be subject to criminal or civil liability in accordance with the applicable legislation.

## E. Cooperate and provide any relevant information to the competent authorities, if requested

The Company declares that it will cooperate with any competent public, administrative and judicial authority, to which it will provide assistance and access by any means or instrument and will disclose any information requested by them regarding any incidents of violence and harassment in the



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workplace.

## 6. **CONFIDENTIALITY & PRIVACY**

In the process of handling any report/complaint and dealing with incidents of violence and harassment at work, the conditions of confidentiality and discretion will be strictly observed both in the person of the complainant and in the person of the accused.

Furthermore, the incident and the content of the report/complaint, as well as any information that could lead to the identification of the parties involved, will be treated with the utmost secrecy.

## 7. **FINAL PROVISIONS**

The Company's Administrator is responsible for the implementation of this Policy, as well as for indicating the necessary amendments to this Policy to improve measures and to enhance the protection of victims of violence and harassment at work.

This Policy shall come into effect upon approval by the Company's Administrator and the full text of this Policy is permanently posted on the Company's website.