

## 1. PURPOSE

### 1.1 Purpose and Scope

The company under the corporate name “BioEmission Technology Solutions S.A.” and the distinctive title “Bioemtech” hereby undertakes, through the present policy, to establish and maintain a healthy working environment which respects, promotes and safeguards the right of every person to a world of work free from violence and harassment. It implements its intention to ensure access of those employed by the company to rights of protection against incidents of violence and harassment, including sexual violence and gender-based harassment. The following corporate policy follows and complies with the standards set by Law 4808/2021, Articles 9 and 10, regarding the legal treatment of harassment and violence in the working environment.

The present policy applies to all employees and persons engaged – irrespective of their employment status – partners, representatives and associates of the company. Within the scope of this specific policy are included, in addition to the above-mentioned members of the company, persons engaged through third-party service providers, trainees, apprentices and volunteers, as well as employees whose employment relationship with the company has ended, and also job applicants or other persons who transact or cooperate with the company.

### 1.2 Statement of Zero Tolerance to Discrimination

The company expresses its explicit and unequivocal intention to create a safe working environment in which every incident of harassment, violence and discrimination shall be addressed and eliminated. The objective of the company is the prohibition of any kind of racial, ethnic, religious discrimination, violence and harassment which is connected with or manifests in the workplace during the course of work or in relation thereto. Compliance with the present policy is mandatory for all employees and for all persons connected with the company in any manner whatsoever. With respect to the aforementioned persons who

violate the established measures and rights of employees, as arising from this policy, the company shall take the appropriate and necessary measures on a case-by-case basis, in order to prevent and avoid the recurrence of the impermissible conduct or incident.

## 2. CONTENT

### 2.1 Legal Basis

The above policy constitutes an act of compliance with Greek Law 4808/2021, as currently in force, with the regulatory administrative acts issued pursuant to the authorization of said law, as well as with the acts – opinions – decisions by the competent independent department of the body of the Hellenic Labor Inspectorate (S.E.P.E.)

### 2.2 Definitions

I. “Violence and harassment”: Means forms of behavior, acts, practices or threats thereof, which aim at, result in or are likely to result in physical, psychological, sexual harm or financial losses, whether manifested individually or repeatedly.

II. “Harassment”: Any form of behavior which has the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether it constitutes a form of discrimination, and includes harassment on grounds of gender or on other grounds of discrimination.

III. “Gender-based harassment”: Any form of behavior connected with the gender of a person, which has the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, degrading, humiliating or offensive environment. Such forms of behavior include sexual harassment, as well as forms of behavior connected with the sexual orientation, expression, gender identity or gender characteristics of the person.

IV. “Discrimination”: Means those acts which translate into differential treatment of persons and result in their unjustified separation on the basis of criteria deriving from prejudice or interests and not evaluative criteria. Indicatively, such discrimination includes discrimination on the grounds of gender, age, language, nationality, race, disability and sexual orientation.

**Examples of behaviors of violence and harassment:**

- Insulting or circulating offensive or obscene material.
- Language containing sexual characterizations and insinuations with racist undertones.
- Use of offensive language when describing or mocking a person with a disability.
- Comments regarding a person’s external appearance or character, which cause shame or embarrassment, as well as insinuations that a person’s external appearance constitutes a stepping stone for the advancement of his or her career in an obscene manner.
- Sending unsolicited messages of sexually explicit content via Social Media or telephone.
- Unwarranted, offensive and persistent questions regarding a person’s age, marital status, personal life, sexuality and preferences, religious and political identity and beliefs.
- Persistent sexual proposals or proposals for an outing [date] from other persons in the workplace, despite refusal.
- Offering advancement of a person’s professional career in exchange for entering into sexual relations.

**3. RISK ASSESSMENT AND SUPERVISORY CONTROL**

**3.1 Assessment of Risks of Violence and Harassment**

The company examines potential risk factors depending on the nature and subject matter of the work provided, psychosocial risks, including but not limited to risks of violence and

harassment at work, with the purpose of assessing existing working conditions and readjusting them in such a manner as to limit, to the extent possible, the likelihood of an incident of violence and harassment occurring in the workplace.

Indicatively mentioned risk cases include: high stress in the workplace, isolated or enclosed workplaces, allocation of job positions, security of facilities and inspection thereof, lack of appropriate training, persons with a history of violent behavior, delivery of goods or services, individual work or work in an isolated space, work late at night or during early morning hours, issues of domestic or personal life diffusing into the workplace.

### **3.2 Supervisory Control**

Control over the observance and implementation of the protection rules established by the present policy constitutes, in principle, the responsibility of the Company's Managers. The Managers approve and ratify the policy within the company and grant the competence and authority to the Responsible Persons for its proper and orderly implementation.

Pursuant to the policy, the following are designated:

I. The Managers themselves as the persons responsible for reviewing reports submitted by members of the company. Furthermore, as the review body, they are responsible for the immediate and thorough ascertainment of the truth thereof, as well as for the investigation of the case with impartiality and objectivity.

II. Ms. ROUCHOTA MARIA-TINA as the contact/liason person, with the principal purpose of providing guidance, information and prevention with regard to addressing violence and harassment in the workplace. The role she performs is twofold:

a) to guide and inform employees, irrespective of whether they address her in relation to an incident or complaint of violence and harassment or not.

b) to receive employees' reports and forward them to the competent review body, which shall proceed to the immediate ascertainment and investigation of the report.

III. Within the framework of the broader allocation and structure of the company, the Heads of the company's departments perform an auxiliary role to the contact person. The Heads ensure that the members of their department are informed of and understand this policy, as well as safeguard its observance within the department's limits. Furthermore, they inform the contact person of violations of this policy which may arise in their departments and contribute to the monitoring and management of their departments for the harmonization with the present policy.

#### **4. OBLIGATIONS AND RIGHTS OF THE COMPANY AND EMPLOYEES**

##### **4.1. Obligations of the Company**

Within the framework of the present policy for combating violence and harassment in the workplace, the company is obliged:

I. To accept and investigate every form of report or incident of violence and harassment, while at the same time respecting the handling of confidential information and the personal data of the involved members of the company.

II. To create a proper and functional working environment within which employees can be informed and made aware both of violence and harassment and of the procedures for addressing them through the company's policy.

III. To assist and support the competent authorities within the framework of any investigations that may arise, as well as to notify the competent Judicial and Administrative Authority in each case, where such notification is deemed necessary.

IV. To ensure the implementation of the present policy, with regard to the adoption of measures for the prevention and avoidance of violence and harassment incidents.

V. To take appropriate and necessary measures against the reported person in order to prevent and avoid the repeated occurrence of incidents or behaviors of violence and harassment, in the event that the prohibition of violence and harassment is violated.

#### **4.2. Obligations of Employees – Members of the Company**

Employees, members of the company, as well as all persons engaged in any form of employment by the company are obliged:

I. To be informed of, understand and comply with the present policy, both for the purpose of their personal safety and for the formation of a healthy and protected environment for the rest of the company's employees.

II. To immediately inform the Head of their department, or if this is not possible, the designated Contact/Liaison Person appointed by the company, of any incident of violence or harassment they perceive in the workplace.

III. To offer their assistance and knowledge in the investigation of any incident which has been reported by a member of the company in accordance with the procedure set out below, provided that their cooperation is required in such investigation.

### **5. RIGHTS OF THE AFFECTED PERSONS**

#### **5.1 Rights**

Every employee/member of the company who encounters or faces incidents or behaviors of violence and harassment, as indicatively defined in paragraph 2.2 under the title "Definitions", which incidents or behaviors have been committed against him or her, is entitled:

I. To report the incidents within the company, following the procedure set out in the present policy and the report management procedure, and to withdraw, should they wish, from the workplace following immediate notification of the Head of the department to which he or she belongs.

II. To seek judicial protection before the competent court, in accordance with the laws and rules of National and European Union Law.

III. To have recourse to the competent authorities designated within the framework of the law for equivalent incidents, such as, indicatively, the Independent Department of the Labour Inspectorate established pursuant to Article 16 of Law 4808/2021 for the monitoring of incidents of violence and harassment at work, and the Greek Ombudsman.

IV. To claim reparations for the harm suffered on any legal basis, since a claim for full compensation arises by operation of law, which covers actual loss and loss of profit, as well as moral damage (e.g. action for damages before the civil courts).

The above rights are also retained by any person connected with the company during the period in which the incident or behavior took place, even if such connection no longer exists.

In any case, when a report or complaint of such behavior arises within the company, the affected person retains every right to have recourse to any competent authority.

The affected person retains the right to withdraw from the workplace for a reasonable period of time without deprivation of salary or any other adverse consequence, provided that, in their judgment and reasonably substantiated belief, there remains a serious risk to his or her life, health or safety, in particular when the employer is the perpetrator of such behavior or when the employer does not take the necessary appropriate measures as set out below in order to restore workplace peace, or when such measures are not capable of stopping the behavior of violence and harassment.

In this case, the person withdrawing is obliged to inform the employer in writing in advance, stating the incident of violence and harassment and the facts justifying his or her belief that a serious risk to his or her life, health or safety is imminent. If the risk does not exist or has ceased to exist and the affected person refuses to return to the workplace, the employer may have recourse to the Labour Inspectorate with a request for the resolution of the dispute.

## 6. PREVENTION AND PROTECTION

### 6.1. Preventive Measures

Within the framework of the above policy and for the prevention of violence and harassment in the workplace, the company shall take, as it is obliged, the following measures:

- I. It establishes a specific procedure for complaints and reports of incidents or behaviors, in order to prevent the prohibited act.
- II. It promotes the reporting and monitoring function of the department by its Head, who performs a supervisory role for the avoidance and identification of prohibited and unlawful behaviors.
- III. It encourages and promotes the training and information of employees regarding legislation on harassment and violence at work.
- IV. It encourages and promotes the training and information of employees regarding the understanding and management of incidents and risks of harassment and violence in the workplace.
- V. It promotes and informs personnel of the competent authorities to which they may address themselves for equivalent incidents [See ANNEX], and in particular the Labour Inspectorate, the S.E.P.E. complaints hotline (15512) and the hotline for victims of gender-based violence (15900).

## 6.2. Protective Measures

For the addressing of violence and harassment in the workplace, the company takes the following measures:

I. It evaluates on a regular basis the effective observance of the present policy and in particular the preventive and response measures concerning incidents of violence and harassment, as well as the possibility of updating the measures in accordance with any changes in the law.

II. It allows the possibility of modification of the initial placement and change of job position for reasons of physical and mental health, as well as the adaptation of the job position.

III. It issues a recommendation for compliance to an employee who displays behavior at the limits of or beyond the prohibition within the workplace.

IV. It provides for the temporary removal of the alleged perpetrator either from the specific Department in which the incident occurred or from the company in general, until the submitted report is examined.

V. It designates a specific person as Contact/Liaison Person, competent to guide and inform employees regarding the prevention and addressing of violence and harassment at work. The role is, in principle, informational and consists in guiding and informing employees on the handling of incidents and behaviors of violence and harassment. Furthermore, they are obliged to receive employees' reports and forward them to the competent review body, which shall proceed to the immediate ascertainment and investigation of the report.

As Contact Person in accordance with the above, Ms. ROUCHOTA MARIA-TINA is designated.

VI. It provides for the change and modification of working hours, job position and manner of provision of work (e.g. teleworking), provided that this is permitted by the nature of the work provided.

VII. It provides for the termination of the employment or cooperation relationship, subject to the prohibition of abuse of rights pursuant to Article 281 of the Greek Civil Code.

### **6.3. Conflict of Interest**

In particular cases where a conflict of interest may arise among the involved persons, the Managers of the company may assign the investigation of the report to the Company's Legal Counsel, who acts independently, or to a third person who is not connected with the company's personnel nor has any relationship with it.

## **7. BREACH OF THE PROTECTION POLICY**

In cases of breach of the present policy, the company is obliged to take measures arising from the framework of the Laws and Regulations in force under National and European Union Law, as well as the measures set out in the policy itself. The adverse consequences for the person violating the policy shall be decided by the Managers of the company on the basis of their appropriateness and may extend up to and including termination of the perpetrator's contract, provided that his or her behavior constitutes a serious act of violence and harassment in the workplace.

## **8. FINAL PROVISIONS**

**8.1.** The Policy for the prevention and combating of violence and harassment in the workplace shall be communicated in its updated form to the Managers of the company and to the employees of the company and shall simultaneously be posted on its website.

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**8.2.** The present policy shall be updated and adjusted accordingly whenever required by the company and the applicable legislation.

**8.3.** The present policy is ratified by the Managers of the company and shall enter into force as of the date of its posting.



## ANNEX

## CONTACT INFORMATION OF COMPETENT AUTHORITIES:

- **Complaints Hotline of the Labour Inspectorate**
- Citizens' service line 1555 – on working days from 09:00 to 15:00.  
In case of inability to speak or lack of telephone access, send an e-mail to tkepalinis@yeka.gr.

**Hellenic Police**

- Call 100 – 24-hour operation.
- In case of inability to speak or lack of telephone access, send an SMS to 100.
- For further information, visit the following website of the Hellenic Police regarding domestic violence:  
[http://www.astynomia.gr/index.php?option=ozo\\_content&perform=view&id=2030  
&Itemid=421&lang](http://www.astynomia.gr/index.php?option=ozo_content&perform=view&id=2030&Itemid=421&lang)

**General Secretariat for Demographic and Family Policy and Gender Equality  
(G.S.D.F.P.G.E.)**

- Call 15900 – 24-hour operation.
- Call 214-4055251.
- In case of inability to speak or lack of telephone access, send an e-mail to sos15900@isotita.gr.

**Useful Websites:**

- <https://isotita.gr>
- <http://womensos.gr>

## **1. PREFACE**

The company under the name “BioEmission Technology Solutions S.A.” and the distinctive title “Bioemtech” guarantees secure and easily accessible communication channels for the reception and examination of reports regarding violence and harassment at work, as well as for the information of complainants. It facilitates the relevant procedures and records them in the following policy.

## **2. INTERNAL REPORT MANAGEMENT PROCEDURE**

### **2.1 Report Submission Procedure**

Every employee, company member, and any third party connected in any way to the company is encouraged to report incidents of violence, harassment, and discrimination occurring in the workplace, whether such incidents occur against them personally or if they witness them. The report may be submitted either with identification through the Report Submission Form, which will be immediately available in the workplace for every person connected with the company, or anonymously. The report may be submitted in person to the Contact/Liaison Person designated under the Policy for the prevention and combating of workplace violence and harassment, or electronically via e-mail at [conduct@bioemtech.gr](mailto:conduct@bioemtech.gr).

Upon submission of a report, both electronically and in person, a receipt of submission will be provided, which will later serve in the investigation of the incident.

### **2.2 Examination and Investigation of the Report**

#### **2.2.1. Report Examination and Evaluation Procedure**

From the moment the report is received by the Contact/Liaison Person of the company, the process of examining the report begins. The Contact Person is obliged to immediately initiate the necessary actions to assess the severity of the report and conduct a thorough

investigation of the incident, in order to then forward the complete case to the company's Managers, who will decide on the measures to be imposed regarding the reported incident and its further referral to the competent authorities. For the Examination and Evaluation of the Report, the Contact Person is obliged to carry out the following actions:

- i. To create a relevant file in which the report will be recorded, followed by the results of the investigation.
- II. To examine and assess whether the severity of the alleged act carries legal and criminal implications, both regarding the perpetrator and the company.
- III. To identify the directly involved persons and limit the inquiry to the Department where the incident was reported.

#### **2.2.2. Report Investigation Procedure**

Beyond the examination and evaluation of the report, the Contact Person is obliged to investigate the report in order to present a complete account of the incident to the company's Managers, who will then decide on the subsequent handling of the issue both within the company and workplace and through referral to the competent administrative and judicial authorities. For the Investigation of the Report, the Contact Person must:

- I. Examine the incident and collect the necessary information.
- II. During said examination, seek the assistance of other persons who may have witnessed the incident or behavior, or in general any related person deemed capable of providing significant information regarding the truth of the matter.
- III. Examine whether similar reports have been filed in the past against the same person.
- IV. Seek the advice and assistance of the company's Legal Counsel regarding legal matters arising from the incident, to be immediately informed of its legal and criminal implications.

V. Take necessary temporary measures to protect the complainant until a final conclusion is reached, such as temporarily restricting the reported person's access to the workplace, transferring them to another department, providing alternative means of performing work (e.g., telework) etc.

VI. Make a definitive classification of the incident (e.g., harassment, unjust discrimination, etc.) in order to clearly investigate the implications of the act.

VII. Inform the complainant, the reported person, and the company of the actions being taken during and until the completion of the examination of the report.

VIII. Draft a concise proposal for the handling of the incident and the reported person, to be presented to the Managers if the report is deemed to require immediate action by the company's Managers.

### **2.3 Evaluation of the Report by the Company Managers**

If the Contact Person deems the report well-founded, they forward it to the company Managers, who will decide the necessary actions required for addressing and resolving the incident according to employee protection measures. The Managers, after examining the report and taking into account the opinion of the Contact Person, are obliged to implement the most appropriate measure for handling the act. Subsequently, if the act is legally and criminally punishable, they may refer it to the company's Legal Counsel for handling the referral and report to the competent Administrative and Judicial Authorities, always taking into account the consent and judgment of the complainant, except in cases where the procedure is initiated ex officio. Actions available to the Managers include, indicatively but not exclusively:

I. Mediation and resolution of the incident through listening to and discussion with the involved parties and the Managers, in a timely manner following receipt and examination of the report.

If the resolution is achieved through mediation among the involved parties, it is mandatory to record the resolution in the report archive and the case file.

II. Resolution through internal workplace measures aimed both at preventing recurrence and alleviating the negative climate in the workplace, as well as properly addressing the reported incident.

III. Referral of the incident to the competent Administrative, Public, and Judicial authority, if the severity of the matter exceeds the company's capacities and competence and has severe legal implications.

This action should be taken following consultation with and assessment by the company's Legal Counsel.

#### **2.4 Maintenance of Report Records – Cooperation with Competent Authorities**

The company, as mentioned in section 2.2.1 [Report Examination and Evaluation Procedure], is obliged under Law 4808/2021 to create a report archive and maintain a file for each case for 10 years. The archive shall record and file the report while always adhering to rules concerning the protection of personal data of the involved parties, as set forth in the Personal Data Protection Law [Law 4624/2019]. This archive shall be made available to any competent Public, Judicial, or Administrative Authority, which [either on its own initiative or upon a party's request] requires provision of information and data regarding an incident that took place in the company's workplace [Article 5, Law 4808/2021].

#### **2.5 Protection of Personal Data of Involved Persons**

This policy and the procedures described herein are bound by the company's Data Protection Policy, as well as the EU General Data Protection Regulation (GDPR – 2016/679) and Greek Law 4624/2019 as currently in force. Every affected person has, under this policy, the right to

appeal to the Hellenic Data Protection Authority, as well as the rights described in the company's Personal Data Protection Policy.

### **3. PROHIBITION OF RETALIATION**

Information and reports submitted to the company are considered confidential and protected under the company's Personal Data Protection Policy, as also referenced in section 2.5. As a consequence of the aforementioned section and of Article 13 of Law 4808/2021, any termination of employment, or any other adverse treatment of the complainant, that constitutes retaliatory behavior or a countermeasure under Article 14 of Law 3896/2010 regarding incidents of workplace violence and harassment, is prohibited and null and void.

Any person affected by such retaliatory act or behavior is entitled to follow the report procedure for harassment as described in this process.



**REPORT SUBMISSION FORM**  
Incidents of Violence and Harassment  
**TO THE COMPANY UNDER THE CORPORATE NAME**  
**“BioEmission Technology Solutions S.A.”**

**Full Name:**

(You may submit the report anonymously – without identification details. In such case, you will not have the ability to monitor and be informed of the progress of your report.)

**By means of the present document, I hereby submit, under my name, a report that on the .... day of the month of ....., year ....., at the workplace of the company BioEmission Technology Solutions S.A., the following incident occurred, which constitutes a violation of the Company’s policy for the combating of violence and harassment in the workplace:**

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**In the above-described incident, the following natural persons are involved:**

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**I hereby request the immediate examination of the reported incident by the company, through the competent procedures, as provided for in the Policy for Protection against Violence and Harassment and in the Report Management Procedure.**

**Place .....**

**Date ..../..../.....**

<b>Reporter</b>	
<b>Signature</b>	

With regard to the personal data provided, the company BioEmission Technology Solutions S.A. hereby informs that, in its capacity as Data Controller, it collects and processes such data exclusively and solely for the execution of the present procedure, as set out in the relevant Report Management Procedure. The data are stored for the period necessary for the processing of the employee's report and subsequently for purposes of archiving and registration in the report registry in accordance with the applicable legislation. Each data subject has the right of access to the data concerning them. The data subject also has the right to request their rectification, the restriction of their processing, as well as to obtain copies in a commonly recognized format in accordance with the provisions of the General Data Protection Regulation. Finally, the data subject has the right to lodge a complaint with the Hellenic Data Protection Authority.