



# Policy against Violence and Harassment at work

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## 1. Introduction

The group of companies MOTOR OIL (HELLAS) CORINTH REFINERIES SA. ("Group") adopts this Policy Against Violence and Harassment at work ("Policy"), according to Articles 9 and 10 of Law 4808/2021 (GG A' 101/19.6.2021), as codified with the P.D. 80/2022, the regulatory legislation pursuant to these and in particular Decision 82063/2021 (GG B' 5059/1.11.2021) of the Minister of Labor and Social Affairs as well as to international best practices.

The Group, aiming to ensure a working environment in which respect for all prevails, complies to all the obligations arising from the legislative provisions and undertakes to take all necessary measures to prevent and tackle any potential or actual form of violence and harassment manifested during work, including gender-based violence and harassment as well as sexual harassment.

## 2. Purpose

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 of violence and harassment.

The Group declares that it recognizes and respects the right of every employee to a work environment free of violence and harassment and emphasizes its zero tolerance of inappropriate behavior in any form and by any person.

## 3. Definitions

- Violence and Harassment: Any conduct, act or practice, single or repeated, that is either intended to cause physical, psychological, sexual or economic harm, or results or is likely to result in such harm. Harassment also includes forms of conduct intended to



violate the dignity of a person and to create an intimidating, hostile, degrading, humiliating, degrading, or offensive working environment, including gender-based harassment and sexual harassment.

- Sexual harassment: Any conduct, whether isolated or repeated, that is related to a person's gender and is intended to violate that person's dignity and create an intimidating, hostile, degrading, humiliating, or aggressive environment.

- Report: The internal verbal or written provision of information about violations related to this Policy.

- Good Faith: A reasonable belief by the reporting party, based on the circumstances and information available to the reporting party, that the information provided is true.

## 4. Scope

The scope of this Policy applies to the persons referred to in par. 1 of article 3 of Law no. 4808/2021, namely:

- i. all employees and staff of the Group, regardless of their contractual status, including those employed under a work contract, independent services, paid mandates, employed through third party service providers,
- ii. persons undergoing training, including trainees and apprentices,
- iii. volunteers,
- iv. employees whose employment relationship has ended,
- v. prospective employees of a Group Company,
- vi. persons who deal or cooperate with the Group.

## 5. Declaration of zero tolerance in incidents of violence and harassment

The Group, remaining focused on its commitment to respect human rights, explicitly and unequivocally declares that any form of violence and harassment manifested during work, whether connected to it or resulting from it, is strictly prohibited.

The Group opposes any kind of behavior or actions that offend or harm or diminish the personality, dignity and prestige of employees or create an intimidating or hostile work environment for them. The behaviors prohibited by this policy include, but are not limited to:

- threatened or actual physical violence
- verbal harassment including abusive and derogatory comments
- physical harassment
- aggressive behavior
- overt threats and intimidation
- acts of retaliation. In particular, the termination or termination in any way of the legal relationship on which the employment is based, as well as any other unfavorable treatment of persons falling within the scope of this Act, is prohibited and shall be null and void if it constitutes retaliatory behavior or retaliation within the meaning of Article 14 of Law no. 3896/2010 for an incident of violence and harassment.
- racist comments
- sexist connotations
- physical harassment and sexual advances
- unethical comments about sexual orientation

Forms of violence and harassment against persons falling within the scope of the Policy may take place in particular:

- a) in the workplace, including public and private places and areas where the employee provides work, receives remuneration, takes a break, in particular for rest or eating, in personal hygiene and care areas, changing rooms or accommodation provided by Group Companies,

- b) travel to and from work, other travel, travel, training, and work-related events and social activities; and
- c) in work-related communications, including those conducted through information and communication technologies.

The above behaviors are indicative and do not constitute an exclusive list of prohibited acts. Anyone listed in Article 4 of this Policy who engages in such prohibited conduct will be held fully responsible for his or her actions.

## **6. Preventing and tackling violence and harassment at work**

### **6.1 Risk assessment of violence and harassment at work**

The Group shall identify the risks associated with violence and harassment at work, considering any inherent risk arising from the nature of the activity, the workplace, factors such as gender and age or other discriminatory characteristics, as well as risks relating to specific groups of employees, e.g. night shift workers, employees who are newly recruited.

For risk assessment, the Group gathers information and data internally while at the same time monitoring international trends and developments in the field of occupational risks and utilizing digital occupational risk assessment tools, such as those available for our country through the interactive, online platform OIRA (Online Interactive Risk Assessment) at <http://www.oiraproject.eu> of the European Agency for Safety and Health at Work (EU-OSHA). It should be noted that an occupational risk assessment is already an obligation of the Group according to par. 1a' of article 43 of Law no. 3850/2010 (Code of Laws on Health and Safety at Work), among which are psychosocial risks.



The Group's Risk Management Unit, in collaboration with the organizational units involved, monitors on a continuous basis the risks related to the above issues, their importance and the safety measures put in place to prevent them.

## 6.2 Measures to prevent, control, mitigate and address the risks of violence and harassment at work and to monitor such incidents or forms of behaviour and actions to inform and raise awareness among staff

The Group, with the main concern of maintaining a working climate where respect for human dignity, cooperation and mutual assistance are core values, ensures a working environment that is accessible, safe and friendly, where relations between employees, partners, management and members of its Companies are characterized by mutual respect, courtesy, honesty and trust. More specifically, the Group:

- oversees the implementation of this Policy,
- is committed to taking the necessary appropriate measures and imposing the appropriate sanctions in order to prevent and resolve issues of violence and harassment at work,
- within its means, commits to take all appropriate measures and make all reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence, as specified in section 6.4 of this Policy,
- encourages its employees and any third party associated in any way with it to report incidents of violence and harassment in the workplace if they come to their attention and commits to cooperate with any competent authority in investigating them,
- has established the appropriate mechanisms to conduct a thorough and fair investigation of potential reports, following the Policy and Procedure for the Management and Investigation of Reports of Breaches of the Regulatory Framework and maintains open communication with immediate supervisors and colleagues,
- ensures that employees are informed of the contents of this Policy and any amendments to it. Information is provided through the provision of informational materials, emails, newsletters, or other appropriate means depending on the category

of employees. In addition, information on the Policy is published on the Group's intranet and in the workplace, while the Policy is posted and remains freely accessible to all interested parties on the website of the Group Companies that have this obligation,

- supports employees - victims of violence and/or harassment with a view to their immediate and smooth reintegration into the workplace; and
- ensures that all necessary technical measures are taken to prevent such incidents e.g. adequate lighting in the Group's premises, emergency notification facility.

In addition to the aforementioned actions, the Group may undertake information and awareness-raising activities for its staff, primarily by providing accessible information on the risks of violence and harassment, prevention and protection measures, the existing procedures within the Group and the possibilities provided by law, while encouraging the participation of employees and management in relevant training programs. In the context of staff awareness raising, the Group may, inter alia:

- Organize targeted staff meetings to discuss relevant issues and address potential risks in a timely manner.
- Conduct seminars with mental health specialists or counselling service providers, representatives of voluntary organizations, etc. to provide information and training on risk management and to identify potential risks in the event of an incident.
- Encourage the participation of employee representatives and management in training programs and seminars on the identification and management of risks of violence and harassment at work.

### **6.3 Rights and obligations of Group employees and of persons exercising managerial rights or representing Group Companies, to the extent and to the extent of their responsibility**

All employees must comply with this Policy and all relevant applicable and applicable procedures and cooperate with any competent authority in investigating any incident of potential violence or harassment by providing requested information.

Any employee, even if the relationship in the context of which the incident or conduct allegedly occurred against him/her has ended, has the right to report any incident of





any form of violence or harassment that comes to his/her attention, in accordance with the provisions set out in the Policy on Reporting Breaches of the Regulatory Framework. The report should be made in good faith and without delay, as soon as it becomes apparent.

Employees who experience incidents of violence and harassment, in accessing employment or during the employment relationship, or even if the contract or employment relationship under which the incident or conduct allegedly occurred has expired, have the right to appeal to the competent authorities as provided by law (a. right to judicial protection, b. right to appeal and file a complaint and request for an industrial dispute with the Labor Inspectorate, within the scope of its statutory powers, c. reporting to the Ombudsman, within the framework of his/her statutory powers).

In the event of a breach of this Policy, appropriate corrective, disciplinary and/or other actions will be taken against the offender. In particular, in the event that an employee or a person employed in another relationship, pursuant to a. 3 of Law no. 4808/2021, violates the prohibition of violence and harassment at work, the Group is obliged to take the necessary appropriate and proportionate measures on a case-by-case basis against the complainant, in order to prevent and avoid a similar incident or behavior from recurring. Such measures may include recommending compliance, changing the position, working hours, place or manner of work or terminating the employment or cooperation relationship, without prejudice to the prohibition of abuse of right in article 281 Civil Code.

When a person exercising managerial right or representing a Group Company violates the prohibition of violence and harassment in the conclusion or refusal to conclude a legal relationship with a person falling within the scope of this Policy or in the development, duration, or termination thereof, violates labor legislation, the administrative sanctions under paragraph a. of para. 2 of article 19 of Law no. 4808/2021.

The Group and the persons exercising managerial authority or representing the Group Companies shall receive, investigate, and manage any complaint or relevant report with zero tolerance for violence and harassment, in a confidential manner and in a way



that respects human dignity, and shall not obstruct the receipt, investigation and management of such complaints or reports. At the same time, they shall provide assistance and access to any competent public, administrative or judicial authority in the investigation of such an incident or conduct, if requested by them.

The details of the competent administrative authorities to which affected persons may appeal (Labor Inspectorate, Ombudsman) are posted on the intranet of the Group Companies. In addition, affected persons may also contact the Labor Inspectorate's complaints hotline through the Citizens' Helpline 1555, as well as the direct psychological support and counselling service for women victims of gender violence through the SOS Line 15900.

#### **6.4. Protecting employment and supporting workers who are victims of domestic violence**

The Group is committed to demonstrating in practice its social responsibility regarding cases of domestic violence and to supporting employees who are victims of domestic violence. Indicatively, measures that the Group may take to protect employment and support employees-victims include, but are not limited to, the provision of special leave or flexible working arrangements at the request of the employee-victim of domestic violence, in order to ensure that the Group supports the employee to maintain employment and/or return to full-time work, especially in cases where the employee-victim has minor children and/or children with disabilities.

### **7. Reference Person**

All the above issues and their similar ones will be explained by the Human Resources Manager of the respective Group Company, who, designated as the Reference Person of this Policy, will, with responsibility and confidentiality, guide and inform employees on the prevention and treatment of violence and harassment at work and answer any



questions they may have. In particular, should persons falling within the scope of this Policy wish to contact the Reference Person for the above purposes, they may do so by name or anonymously through the following channels of communication:

- via email,
- by telephone on the direct telephone line of the Reference Person,
- personal meeting with the Reference Person, upon submission of a written or oral request or via email to the Reference Person

The Reference Person shall comply with all provisions on the protection of personal data and confidentiality in the performance of his/her duties.

## **8. Receipt and Examination of reports**

If any Group employee believes that he or she has been subjected to violence or any form of harassment or has witnessed such behavior taking place in his or her work environment, he or she must follow the detailed provisions of the Group's Breach of Regulatory Framework Reporting Policy to report the incident.

In particular, to report a doubt, complaint or (alleged) violation(s) of this Policy, persons falling within the scope of this Policy may communicate anonymously or anonymously through the following communication channels:

- Electronic Reporting Platform: <https://whistleblowing.moh.gr/#/>

- Written report - Letter with the indication "to the attention of the Officer Responsible for the Receipt and Monitoring of Reports ("O.R.R.M.R.") or the Compliance Officer (for Group companies that have not designated an O.R.R.M.R.)" or "Report of the Law no. 4808/2021" at the address: 12A Irodou Attikou 12A, 151 24, Maroussi, Greece

- Personal meeting of the whistleblower with the Officer Responsible for the Receipt and Monitoring of Reports (O.R.R.M.R.) or Compliance Officer (for Group companies that have not appointed an O.R.R.M.R.), upon the whistleblower 's request in writing or orally or via email to the O.R.R.M.R. or the Compliance Officer, respectively.



The Group has established the appropriate investigation mechanisms, following the Procedure for the Management and Investigation of Reports of Breach of the Regulatory Framework (Whistleblowing Procedure) and handles with absolute confidentiality and discretion the management of all incidents of complaints of discrimination, violence and harassment.

Pending the outcome of a potential investigation and with a view to maintaining workplace safety and the integrity of investigations, the Group may, among other things, move employees or modify their working hours. During this period, partial or total access to buildings and/or facilities may not be permitted.

## **9. Related Policies & Procedures**

- Regulatory Framework Violation Reporting Policy (Whistleblowing Policy), and
- Procedure for the Management and Investigation of Reports of Regulatory Framework Violation (Whistleblowing Procedure).