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Policy on the Prevention and Combatting Violence and Harassment in the Workplace

Summary

This Policy outlines the framework for managing any form of violence and harassment in the workplace in accordance with law No. 4808/2021 on labor protection and other provisions.

Document Revision & Approval History

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The Executive Director Internal Audit OTE Group has been notified of this Policy.

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1. Purpose

1.1. The Company undertakes to comply with all measures and obligations related to the application of the provisions of Part II of L. 4808/2021 on the prevention and management of all forms of violence and harassment, including sexual and gender-based violence and harassment. The Purpose of Part II of L. 4808/2021 is to set a coherent and modern framework for preventing, addressing and combating all forms and incidents of violence and harassment, contributing to the creation of a working environment that respects, promotes and safeguards the right of every person to a world of work free of violence and harassment.

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

1.3. This Policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulatory legislation pursuant thereto.

2. Scope

The scope of this policy covers (par 1 of Article 3 of Law no. 4808/2021) employees and other persons working for the Company of OTE, Cosmote, Germanos, Cosmote Technical Services and Cosmote E-Value (hereinafter Company), irrespective of their contractual status, including those employed under a project contract, an independent services contract, a remunerated mandate, those employed through third-party service providers, as well as persons attending training, including trainees and apprentices, volunteers, employees whose employment relationship has ended, and job applicants.

In the rest of the OTE Group companies, the Policy will come into force after a decision by their competent body.

3. Access Rights

This Policy is posted on the Company's Process web and Intranet. Access to this policy is free for all employees.

In the event that the document cannot be accessed by an employee or external associate who falls within the scope of this policy, the information will be provided by the relevant Director.

The distribution of this document outside the Company is not allowed.

4. Legal framework

4.1 All forms of violence and harassment, whether linked with or arising out of work, including gender-based violence and harassment and sexual harassment, are prohibited.

Article 4 (Par 2) of Part II of Law No. 4808/2021 provides the definitions of both "violence and harassment", as well as of "harassment" and "gender-based harassment". Specifically:

a) the term "violence and harassment" shall be understood as a range of behaviors and/or practices, or threats thereof, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, whether a single occurrence or repeated;

(b) the term "harassment" means behaviors that aim at or result in the violation of a person's dignity and the creation of an intimidating, hostile, degrading, humiliating, dehumanizing or offensive environment, regardless of whether or not they are discriminatory, and includes gender-based harassment or harassment related to other grounds of discrimination;

(c) the term "gender-based harassment" means behaviors directed at persons because of their sex or gender that aim at or result in the violation of that person's dignity and the creation of an intimidating, hostile, degrading, humiliating, or offensive environment. These behaviors include sexual harassment, as well as forms of conduct directed at persons because of their sexual orientation, expression, identity or gender characteristics [relevant provisions of Art. 2 of L. 3896/2010 (A' 107) and of Art. 2 (par. 2) of L. 4443/2016 (A' 232)].

It is noted that, with regards to raising awareness of OTE Group employees in relation to sexual harassment and the prevention of this phenomenon, the provisions of the "Policy on Avoiding Sexual Harassment within OTE Group" apply.

4.2. Incidents of violence and harassment against persons concerned by this Policy may occur, particularly:

(a) at the workplace, including public and private places and places where the employee performs their work, receives remuneration, takes a rest break or a meal, or uses sanitary, washing and changing facilities or employer-provided accommodation;

(b) when commuting to and from work, and during work-related trips, travel, training, and work-related events and social activities;

(c) through work-related communications, including those enabled by information and communication technologies.

5. Workplace violence and harassment Risk Assessment

The Company must identify the hazards and risks of violence and harassment, taking into account, inter alia, any inherent risk arising from the nature of the activity, the occupation, factors such as gender and age or other protected characteristics, as well as risks related to specific groups of employees (such as night-shift workers, new recruits).

In order to perform the risk assessment, the Company may use both internal digital Enterprise Risk Assessment tools, such as the Enterprise Risk Management - TRMS tool (Telekom Risk Management Solution tool), or those available in Greece through the interactive web platform OIRA (Online Interactive Risk Assessment) accessible on the website of the European Agency for Safety and Health at Work (EU-OSHA) <http://www.oiraproject.eu>.

It should be noted that employers are obliged to conduct an Enterprise Risk Assessment under Article 43 (1a) of the law No. 3850/2010 (Code of Laws related to Occupational Safety and Health), including in relation to psychosocial hazards.

6. Measures for Prevention, risk management and monitoring of such incidents or forms of behavior

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

- Encouragement to maintain a working climate where respect for human dignity, cooperation and mutual assistance constitute core values
- Open communication with the Company, the immediate supervisors and colleagues
- A Whistleblowing Policy
- Ensuring that employees have the necessary training/information to carry out their duties, particularly in jobs that have higher risk of workplace violence and harassment
- Technical measures, such as the installation of emergency alarms, improved lighting, etc.
- Actions to raise awareness among employees of healthy patterns of behavior (e.g. addiction prevention), but also on issues concerning vulnerable categories of employees
- Guidance and support for victims of violence and harassment or of domestic violence victims to reintegrate them into the workplace
- Training of employees on managing incidents of violence

In order to monitor incidents of violence or violence and harassment behaviors, an annual evaluation of the effectiveness of the preventive measures in place and of the measures taken to address the situations in question, as well as an update of the Risk Assessment process and the related measures resulting from it, shall be carried out.

7. Information and awareness-raising actions for Company employees

The Company undertakes to provide employees falling within the scope of this Policy with updates and information, in accessible formats and as appropriate, on the identified hazards and risks of violence and harassment, and the associated prevention and protection measures, on the procedures that exist at the corporate level and on the legal provisions in the event of such incidents.

In this context, the Company, may, inter alia:

- Organize targeted employee and worker meetings to discuss relevant issues and address potential risks in a timely manner;
- Conduct seminars/webinars for awareness with mental health specialists or counselling service providers, representatives of volunteer organizations, etc;
- Encourage the participation of employee representatives and management in training programs and seminars on the identification and management of hazards and risks associated with violence and harassment at work.

8. Rights and obligations of employees and individuals exercising managerial authority or representing the Company

In the event that a person is subjected to an incident of violence and harassment when accessing employment, during the employment relationship or even if the contract or employment relationship under which the incident or conduct is alleged to have occurred has expired, the affected party has a right to:

- a) judicial protection,
- b) submit an appeal, a complaint and an application for an industrial dispute to the Labor Inspectorate, within the scope of its statutory powers,
- c) file a complaint with the Greek Ombudsman, within the scope of their statutory powers; and
- d) file a complaint within the Company in accordance with the "Whistleblowing Policy". In any case, when such conduct is reported or denounced within the Company, the aggrieved party retains all rights of recourse to any competent authority.

Any person within the scope of this Policy who suffers an incident of workplace violence and harassment against them, must first notify the Company in writing, stating the incident of violence and harassment and the circumstances that justify their belief that the situation presents an imminent and serious danger to life, health or safety. In cooperation with the Company's relevant business units, the appropriate measures to deal with the incident (e.g. removal from the workplace) and the necessary implementation time of such measures, shall be determined.

In this case, if the danger ceases to exist and the person concerned, who was removed from the workplace, refuses to return, the Company may appeal to the Labor Inspectorate with a request to resolve the dispute. In this case, Article 18 of Law 4808/2021 applies.

When an individual exercising the managerial right or representing the Company violates the prohibition of violence and harassment in entering into or refusing to enter into a legal relationship with a person falling within the scope of this Policy, or in the development, duration or termination of such a relationship, violates the labor legislation, the administrative sanctions as defined in Article 19 (par. 2) of Law 4808/2021 (e.g. administrative fine, etc.) apply.

In any case, the violation of the prohibition of violence and harassment gives rise, among other things, to a claim for full compensation of the person affected, which covers both non-pecuniary and pecuniary damage, as well as moral damage.

The contact details of the competent administrative authorities to which any aggrieved party has the right to appeal (Labor Inspectorate, Greek Ombudsman) are posted on the Company's intranet.

Furthermore, the aggrieved individuals can also contact the Employment Inspection Authority (SEPE) complaint hotline via the 1555 citizens helpline, as well as the direct psychological support and counselling service for women victims of gender-based violence through the SOS 15900 hotline.

In addition, employees can contact the psychological support line "Next to you", provided by the Company, via phone at +30 8001150327 (code 1588) on a 24/7 basis to report incidents of violence or harassment and receive support.

9. Designation of a person of reference ("contact person") for guidance and information on preventing and addressing violence and harassment at work

The Company has appointed the Executive Director of Compliance, Enterprise Risk Management and Insurance OTE Group as the "person of reference" to provide guidance and information regarding the prevention and management of violence and harassment incidents at work while the following channels of communication have been set up:

- E-mail: askmecompliance@ote.gr or
- Tel.: +30 210 611 2345 (Monday through Friday: 10:00 a.m to 5:00 p.m)

The role of the "person of reference" is informative: it is to guide and inform employees—regardless of whether or not the person of reference was contacted in response to an incident or to report a violence and harassment incident or not. In any case, it is the duty of the abovementioned person of reference to protect Personal Data (PD) which may come to their knowledge in the exercise of their role.

10. Employment protection and support of employees-victims of domestic violence

The Company takes measures that actively demonstrate its social responsibility towards the phenomenon of domestic violence. Indicatively, such measures may include employment protection, the provision of special leave or flexible working arrangements at the request of the employee-victim of domestic violence, in order to support them in maintaining employment and their smooth reintegration after such incidents, especially in cases involving minor children or children with disabilities or serious illnesses.

11. Receipt and examination of enquiries and complaints

11.1 For queries regarding compliance with this Policy or in case of doubt, complaint, violation or alleged violation of this Group Policy, employees falling within its scope may contact the OTE Group Compliance Office through the following communication channels:

- E-mail: askmecompliance@ote.gr (for enquiries)
- E-mail: tellmecompliance@ote.gr (for grievances / complaints)
- E-mail: humanrights@ote.gr (in case of doubt or concern about any relevant issue)

The OTE Group Compliance Office receives, examines and manages grievances or complaints from affected individuals regarding violent or harassing behavior.

The competent employees of OTE Group's Compliance Office shall inform the aggrieved party of the possibility to also submit, at any stage of the procedure followed within the Company, a complaint to the competent administrative authorities (Labor Inspectorate, Greek Ombudsman) within their competence, as well as to the judicial authorities, at the aggrieved party's option.

11.2 The Company and its competent employees, who have received specific training for this purpose, undertake to receive and not to obstruct the receipt of, to investigate and deal promptly with any such complaint, to investigate and examine the complaint with impartiality and respect for human dignity, and to take immediate measures to protect the aggrieved party. The Company also takes all the required measures in order to ensure that the whistle-blowers who report incidents of violence or harassment, in good faith, will be protected from any retaliation resulting in personal, professional or financial damage.

Personal data is processed in accordance with the Binding Corporate Rules for the Protection of Personal Data within the DT Group and the Rules for the Proper Use of Communication Media, Access & Control Systems of Company Computers.

The data collected (personal data and other information) are kept for three (3) years, for the purpose of investigating a complaint, violation or alleged violation of this Policy, unless there are serious reasons that require their retention (e.g. ongoing investigation, pending legal proceedings).

The OTE Group Compliance employees responsible for investigating and managing the complaint may have access to Company records, audiovisual material collected by the Company, and other appropriate means to gather information and evidence during the investigation of the complaint and to ascertain the facts of the complaint.

11.3 The termination or dissolution, in any way, of the legal relationship on which the employment is based, as well as any other unfavorable treatment of a person falling within the scope of this Policy, is prohibited and null and void where it constitutes retaliatory conduct or countermeasure within the meaning of Article 14 of L. 3896/2010 (A' 207) in cases of violence and harassment under Article 4 of the L. 4808/2021.

11.4 If an employee or other persons concerned by this Policy, violate the prohibition of violence and harassment (article 4 of L. 4808/2021), the Company is obliged to take the necessary and appropriate measures against the complainant, where applicable, in order to hinder and prevent the recurrence of similar incidents or behaviors. Such measures may include recommendations to comply; changing the employment position, working hours, place or manner of employment, or terminating the employment or cooperation relationship, without prejudice to the prohibition of abuse of right as defined in Article 281 AK (Art. 12(2) of L. 4808/2021).

11.5 The Company as well as OTE Group Compliance Office employees responsible for receiving and managing such complaints shall cooperate with any competent public, administrative or judicial authority, which, either ex officio or upon request by an aggrieved person, within the scope of its competence, requests the provision of data or information, and undertake to provide assistance and access to the data (Article 5 (par 1) L. 4808/2021).