

Policy on combating violence and harassment and managing internal complaints under Articles 9 and 10 of Law No. 4808/2021 pursuant to par. 1 of article 22 of Law No. 4808/2021 (Government Gazette A' 101).

Company - Branch :

“GASTRADE NATURAL GAS CONSTRUCTION AND TECHNICAL SOCIETE ANONYME” and branch of Alexandroupolis

Headquarters/Head Office: 197, Kifissias Ave., Maroussi, Attica

Branch: Komnion 1 & Dimokratias Ave., Alexandroupolis

Details of Legal Representative

SURNAME: Sifnaios

NAME: Konstantinos

1. The Company shall comply with all measures and obligations relating to the implementation of the provisions of Part II of Law No. 4808/2021 on prevention and response to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

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

3. This policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulatory legislation pursuant thereto and includes the persons referred to in par. 1 of Article 3 of Law No. 4808/2021 (employees and persons employed in the private sector, regardless of their contractual status, including persons employed under a work contract, independent

service providers, persons employed through third-party service providers, as well as persons attending training, including trainees and apprentices, volunteers, employees whose employment relationship has ended, as well as persons applying for employment and workers in the informal economy).

A. Preventing and combating violence and harassment at work

α) A declaration of zero tolerance of violence and harassment at work, wherever it comes from

The Company rejects and opposes, in an explicit and categorical manner, any form of violence and harassment that occurs during work, whether related to or resulting from it.

In particular, the Company is committed to:

- integrate and generally strengthen preventive and repressive mechanisms and procedures for dealing with and eliminating incidents of violence and harassment at work,
- receive, investigate and handle any relevant report/complaint with confidentiality and respect for human dignity, and not to obstruct the receipt, investigation and handling of such complaints,
- not to victimize the person who has been harassed or subjected to violence, and not to take any action that could be described as 'retaliation' or 'retribution',
- take all appropriate measures and make all reasonable adjustments to working conditions to support employees who are victims of domestic violence when such an incident comes to its attention,
- provide assistance and access to any competent public, administrative or judicial authority in the investigation of any incident of violence and harassment.

In addition, it is prohibited for any employee or third party, in any way related to him or her, to take retaliatory action against another employee or third party who opposes violence or harassment of any kind, files a complaint, testifies, assists or participates in any incident investigation process.

(b) an assessment of the risks of violence and harassment at work,

The Company has not to date encountered any risks of violence and harassment at work, but in any case that any such incident comes to its attention, it will take all necessary measures to deal with it.

(c) measures to prevent, control, mitigate and respond to such risks, and to monitor such incidents or patterns of behavior,

All employees of both the head office and the branch of Alexandroupolis are informed of this policy and of their rights and the provisions of the law to prevent and combat incidents of violence and sexual harassment.

Employees are informed by this policy that in accordance with Art. 4 of Law 4808/2021 "**Any form of violence and harassment, which occurs during the course of work, whether related to or resulting from it, including gender-based violence and harassment and sexual harassment, is prohibited.**"

Information and training of staff will take place by all appropriate means, and the designated reporting person will be responsible for guiding and informing employees on how to prevent and deal with incidents of violence and harassment.

(a) "violence and harassment" means any form of conduct, acts, practices or threats thereof, intended to cause, resulting in or likely to result in physical, psychological, sexual or economic harm, whether occurring in isolation or repeatedly,

(b) 'harassment' means any form of conduct which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, dehumanizing or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment on grounds of sex or other grounds of discrimination,

(c) "gender-based harassment" means forms of conduct related to the gender of a person, which have the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, degrading, humiliating, humiliating or aggressive environment as defined in Article 2 of Law No. 3896/2010 (Government Gazette A' 107) and par. 2 of Article 2 of Law No. 4443/2016 (Government Gazette A` 232). These forms of conduct include sexual harassment under Law No. 3896/2010, as well as forms of conduct related to the sexual orientation, expression, identity or gender characteristics of the person.

(d) "Sexual Harassment" means 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 or degrading environment around that person. It is behavior with a sexual tone or innuendo, manifested in actions or words, which are unpleasant and offensive to a person. It is not required to be repetitive behaviors, even a single incident can be considered as such.

(e) "Offensive behavior" related to incidents of violence and harassment means dangerous, unethical or illegal practices that take place in the workplace or in the context of the Company's activities and which include, but are not limited to, moral harassment (mobbing), bullying, threats, extortion, blackmail, insult,

defamation, slander, discrimination based on a person's gender, sexual orientation, color, age, nationality, religious and/or political beliefs, marital status.

Forms of violence and harassment against workers may take place in particular:

(a) at the workplace, including public and private places and places where the worker performs work, receives pay, takes a break, in particular, for rest or eating, in personal hygiene and care facilities, changing rooms or accommodation provided by the employer,

(b) travel to and from work, other travel, trips, education, and work-related events and social activities; and

(c) in work-related communications, including those carried out through information and communication technologies.

Indicative examples of violence/harassment are listed in Annex 1

(d) information and awareness-raising activities for staff,

All employees of both the head office and the branch of Alexandroupolis are informed of this policy and of their rights and the provisions of the law to prevent and combat incidents of violence and sexual harassment. They are also constantly informed of any changes in the relevant legal and regulatory framework.

In addition, the company undertakes to organize staff meetings to discuss relevant issues and address potential risks in a timely manner, to conduct seminars with mental health specialists or counseling service providers, representatives of volunteer organizations, etc., and to encourage the participation of employees and managers in training programs and seminars for identifying and managing the risks of violence and harassment in the workplace.

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

(e) information on the rights and obligations of employees and the employer, as well as of persons exercising managerial authority or representing the employer, to the extent and to the extent of their responsibility, in the event of the occurrence or reporting or reporting of such incidents, and on the relevant procedure

All employees of both the head office and the branch of Alexandroupolis are informed of this policy and their rights, as well as the relevant provisions of Law 4808/2021 and of the Ministry of Justice Decree 101269/2021 (Government Gazette B' 5998) concerning issues related to the conduct of the procedure, the appearance of the parties and the evidence before the Hellenic Labor Court for incidents of violence and harassment according to article 18 of the Law. 4808/2021 (Government Gazette A' 101).

This procedure for the resolution of disputes before the Hellenic Labor Inspectorate (SEPE) is set out in detail in Annex 2 of this policy for the information of employees.

This policy will remain posted on the notice board and on the Company's website, while employees will be informed about its approval and implementation via an email message.

In any case, **every affected employee is informed that he or she has a right:**

- (a) judicial protection,
- (b) filing an appeal, a complaint and a request for an industrial dispute with the Labor Inspectorate, within the scope of its statutory authority,
- (c) reporting to the Greek Ombudsman, within the framework of his statutory authority, and
- (d) a complaint within the company in accordance with this policy. Where a report of such conduct within the business arises, the aggrieved person retains all rights of recourse to any competent authority.

Through the 1555 citizens' helpline, a complaint can be submitted by telephone to the SEPE (Labor Inspectorate).

Furthermore, the direct psychological support and counselling service for women victims of gender violence (**SOS 15900**) is also important.

(f) designating a contact person ("liaison") to guide and inform workers on how to prevent and deal with violence and harassment at work

The competent contact person ("liaison") for guidance and information for employees on the prevention and response to violence and harassment at work is Mr. Alexandros Koutroumpousis, MD Office Manager.

For any legal information/clarification employees can contact the General Counsel, Ms. Katerina Patsantara.

(g) Protecting employment and supporting workers who are victims of domestic violence, to the extent possible, by any appropriate means or reasonable accommodation.

Any worker who is a victim of domestic violence may request support both in terms of counselling and consultation with the employer to facilitate his/her working arrangements.

B. Procedure for receiving and examining complaints

(a) channels of communication - competent persons

The contact person ("liaison") for any complaints is Mr. Alexandros Koutroumpousis.

Reports/complaints can be submitted:

A) via email to the address: a.koutroumpousis@gastrade.gr,

B) via mail to the address 197 Kifisias Ave and 40-42 Anavryton St, Maroussi, Attica, Postal Code 15124, marked "Confidential" and to the attention of Mr. Alexandros Koutroumpousis.

C) orally by telephone or, upon request of the reporter, through a personal meeting with the reference person, within a reasonable time frame. In these cases, the conversation is recorded, if the complainant consents to this, or the conversation or minutes of the meeting are fully and accurately transcribed, and then the complainant is given the opportunity to verify, correct, and agree with the produced text by signing it. If the complainant refuses to sign, the author of the text will make a relevant mention.

Reports/complaints submitted through the specified methods to the contact person are assigned a unique case file number.

(b) investigating and examining complaints impartially and protecting the confidentiality and personal data of victims and persons being accused,

The competent contact person will immediately examine the complaint, within the framework of his/her competences, while complying with the provisions of national and EU legislation on the protection of personal data (Law 4624/2019 and Regulation (EU) 2016/679) and will subsequently duly inform the Management and/or the Board of Directors of the Company, as appropriate in each case, about the potential need to take measures against the person being reported.

Specifically, the contact person – the person responsible for examining complaints checks and evaluates the reported cases reasonably and classifies them based on the criteria/parameters defined below in this policy. Depending on the classification of the complaints, the contact person forwards them to the aforementioned relevant bodies, as applicable, for further investigation.

Complaints shall not be forwarded for investigation by the contact person but shall be archived, with simultaneous notification to the complainant, when:

- They do not pertain to the Company's operations, employees, or associates,
- They have been submitted with the same content previously and have been answered,
- They are vague,
- They are unfounded or indefinite, lacking completeness and substantiation of the alleged conduct or act, or when such reports allege behaviors unrelated to the subject of this policy.

Complaints that concern individuals covered by the provisions of this policy as defined above and in paragraph 1 of Article 3 of Law 4808/2021 are forwarded for investigation to the Company's Managing Director.

Complaints concerning the Managing Director, the Chairman, and the members of the Board of Directors are forwarded for investigation to the Board of Directors.

(c) the prohibition of retaliation against the aggrieved person,

Any complaint will remain confidential and will not lead to "retaliation" against the affected person.

Any discrimination against an aggrieved person is prohibited and unacceptable if it constitutes retaliatory conduct or countermeasure a) on the grounds of gender or marital status; b) when it constitutes retaliatory conduct for the employee's non-compliance with sexual or other harassment against him/her; c) when it is made in response to a reaction, protest, complaint, testimony, or any other action of an employee before a court or other authority related to the application of this Policy.

(d) a description of the consequences of any violations found,

In any case where a violation of the relevant provisions is established, the Company will take compliance measures against the respondent (indicatively: 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) and any required legal action both with regard to the employment status of the offending employee and the notification of the competent authority (S.E.P.E.).

(e) cooperating and providing any relevant information to the competent authorities, upon request.

The Company will cooperate seamlessly with any competent public, administrative or judicial authority, which, either ex officio or upon request by an aggrieved person, within its competence, requests the provision of data or information and is obliged to provide assistance and access to the data (paragraph 1

of article 5 of Law 4808/2021). To this end, any information they collect, in any form, shall be kept in a relevant file, subject to the provisions of Law No. 4624/2019 (Government Gazette A' 137).

Note: If this policy is amended, the Company will notify employees of any such change.

ANNEX 1

Indicative examples of violence and harassment:

- Circulation of offensive or obscene material (printed or electronic).
- Mocking, insulting or 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 shame or embarrassment.
- Sending unsolicited messages with sexual or threatening or offensive content via SMS, e-mail, social media, fax, letter, telephone communication.
- 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.
- Solicitation of a sexual relationship with the threat (direct/indirect) that any refusal will affect career development or recruitment.
- Obscene gestures, touching and any kind of unwanted physical contact.
- Exposure of body parts for the purpose of sexual arousal.
- Spreading 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 beliefs).
- Verbal or gestural threats, such as shouting or swearing - in public or in private – at staff or colleagues, intimidation of workers.
- 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 of people for trivial reasons.
- 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.
- Retaliation or intimidation in case of reporting or threatening to report any harassing behavior.

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

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

ANNEX 2

No 101269 (Government Gazette B' 5978/20.12.2021)

Regulating issues relating to the conduct of the proceedings, the appearance of the parties and the evidence before the Labor Inspectorate for incidents of violence and harassment under article 18 of Law No. 4808/2021 (Government Gazette A' 101).

Article 1

PURPOSE

1. The purpose of this Decision is to regulate particular issues relating to the conduct of the proceedings, the appearance of the parties and the evidence before the SEPE in cases of applications for the resolution of disputes relating to violence and harassment pursuant to Article 18 of Law No. 4808/2021 (A' 101).
2. This includes derogations from Article 3 of Act No. 3996/2011, as amended by Article 23 of Law No. 4144/2013 (A' 88) and Article 122 of Law No. 4808/2021. For matters not regulated herein, the above provisions shall apply.
3. For a case to be subject to the current procedure for labor disputes concerning violence and harassment at work under Article 18 of Law 4808/2021, it is necessary for there to be a dispute that arises from the employment or work relationship in the private sector, regardless of the contractual status of the employees, according to paragraph 1 of Article 3 of Law 4808/2021, concerning the compliance with the specific provisions of Articles 4, 12, 13 of Law 4808/2021.

Article 2

SOURCES

1. Any person referred to in Article 3 of Law 4808/2021 who is affected by an incident of violence and harassment against them according to Article 4 of the same law, even if the relationship within which the incident or behavior is alleged to have occurred has ended, has the right to file a request with the Labor Inspectorate.
2. The employer also has the right to file a request to the Labor Inspectorate, in the event that he/she claims that the aggrieved person as defined in c' and d' of paragraph 3 of article 12 of Law 4808/2021 refuses to return to the workplace, while the appropriate measures of paragraphs 2 and 3 have been taken and the risk which obliged him/her to leave no longer exists.

3. The employer also has the right to file a request with the Labor Inspectorate in the case where it is claimed that the affected person mentioned in paragraphs c and d of paragraph 3, Article 12, of Law 4808/2021 refuses to return to the workplace, even though the appropriate measures of paragraphs 2 and 3 of Article 12 have been taken and the risk that required them to leave no longer exists.

Article 3

CONDITIONS OF ADMISSIBILITY OF THE APPLICATION

1. The application shall be submitted, at the option of the aggrieved person - complainant, either to the Head of the competent Regional Directorate of Labor Relations Inspection or to the Head of the competent Department of Labor Relations Inspection and the dispute resolution procedure shall be conducted by the latter.

2. In order to be admissible in this procedure, the application must be named, written and specific, indicating the full details of the applicant, the aggrieved party and the respondent (name or surname and legal representation, if applicable, postal address, contact details), as well as the specific incidents or conduct of violence and harassment at work and other incidents, as defined in articles 4, 12 and 13 of Law No. 4808/2021.

3. The application must be submitted in Greek only, and any relevant documents in foreign languages will be accepted only if they are legally translated. If the applicant does not speak Greek during the hearing, an interpreter must be present, under the applicant's own responsibility, and if he or she cannot write, and if he or she pleads this to the competent official, the latter must draw up the application, indicating this fact at the end of the application.

Article 4

INVITATION - PARTIES PRESENT

Following the submission of the above application, the institution/head of the institution/head referred to in par. 1 of Article 3 of this Decision which conducts the labor dispute shall determine the hearing of the application within ten (10) calendar days of its filing at the latest.

1. Subsequently, a written invitation shall be sent, by any appropriate means, to all parties involved according to law, namely:

a) to the applicant - affected person of article 3 of Law. 4808/2021 or applicant - employer in the case of subparagraphs c' and d' of par. 3 of Article 12 of Law No. 4808/2021,

(b) the employer, or another person exercising managerial authority or representing the employer, whether or not he or she is the person complained of,

c) to another employee or person employed in another relationship pursuant to article 3 of Law No. 4808/2021, when this is the person complained of,

d) to the Ombudsman for the exercise of his statutory authority, in accordance with the provisions of Law. 3094/2003, in cases where the dispute concerns a violation of the provisions of Article 2 of Law 3094/2003. 3896/2010 (Government Gazette A' 207) and the provisions of paragraph 2 of Article 2 of Law No. 4443/2016 (Government Gazette A' 232).

2. The invitation must clearly state the subject matter of the case, with the application attached to it, and the date and time of the hearing must be indicated. At least two (2) working days must elapse between the date of receipt of the invitation and the date of the hearing, in order to ensure the preparation of the parties and to avoid postponement of the hearing for this reason.

3. When sending the invitation or afterwards and until the conclusion of the procedure, the competent Labor Inspectorate may request the documents and information it considers necessary for the conduct of the procedure and relevant to the requests to be examined.

Article 5

DEBATE - EVIDENCE - ADMINISTRATIVE AND CRIMINAL SANCTIONS

1. During the discussion, the invited party must produce any document or other evidence that has been requested in the invitation; otherwise, the administrative penalties provided for under Article 24 of Law 3996/2011 will be imposed, following a summons to provide written explanations.

2. Regarding the employment relationship of the petitioner, the Labor Inspector accepts as true the information that arises from the official documents that the employer is required to maintain and submit to the Labor Inspectorate. Any other relevant private document or evidence presented in any form, physical or electronic, is considered and assessed freely.

3. The Labor Inspector has the ability to examine the involved parties either individually or by cross-examination, at his or her own discretion. He has also the authority to conduct an autopsy and has free access to the company/employer's records, as well as to any audiovisual material collected by it for a lawful purpose, such as for the security of its facilities.

4. During the labor dispute process, up to two (2) representatives from each interested party can be present, in addition to legal advisors. These include representatives of organizations and interpreters, as applicable.

5. During the labor dispute process, the procedural rule of reversing the burden of proof as per para. 1 of article 24 of the Act. 3896/2010 is applied. Specifically, once a prima facie case has been established by the claimant alleging facts or evidence from which an incident of violence or harassment is inferred,

including gender-based violence and sexual harassment, the respondent then bears the burden to rebut this presumption and prove that such circumstances did not occur.

6. The discussion shall be limited to the facts contained in the application, without the possibility of materially altering them subsequently.

7. Postponement of the discussion is permissible for good cause, taking into account the interests of the parties, provided that, in the opinion of the Labor Inspector, there is no risk that the procedure will not be completed within two months of the complaint, as stipulated in Article 18 of Law No. 4808/2021.

8. In case of unjustified non-appearance of one of the summoned parties, the views of the party present shall be recorded and a presumption of the truth of its allegations shall be established, while at the same time the administrative sanctions of article 24 of Law 3996/2011 may be imposed on the absent party, after a summons to provide written explanations.

9. The procedure is concluded with the reasoned Conclusion of the Inspector, which may include the imposition of administrative sanctions, including the order to take interim measures pursuant to Article 19 of Law No. 4808/2018, as well as the filing of a complaint if a criminal offence has been committed. In case a provisional measures order has already been issued, the Conclusion decides whether to maintain, or revoke or modify the ordered provisional measures.

10. In any case, the provisions of paragraph 5 of Article 4 of Law 3094/2003 apply when the Ombudsman exercises his legal authority to conduct an independent investigation and formulate his final report on a complaint.

Article 7

OTHER REGULATIONS - ENTRY INTO FORCE

1. In cases where the application for a labor dispute includes a request related to the common provisions of labor legislation, the applicant is asked at the time of submission to separate the issues, so that each request can be discussed according to the legally prescribed procedure for resolving labor disputes.

2. For matters not regulated by this Decision, Article 3 of Law No. 3996/2011 applies, as amended by Article 23 of Law No. 4144/2013 and Article 122 of Law No. 4808/2021.

3. The entry into force of this Decision shall commence from the date of its publication in the Government Gazette and pending disputes before the Labor Inspectorate concerning incidents of violence and harassment at work at the time of entry into force of this Decision shall be concluded in accordance with the previous legal framework.