

Policy on the Prevention and Combating of Incidents of Workplace Violence and Harassment - Management of Complaints

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1. Introduction

Optima bank and its subsidiaries, hereinafter referred to as the "Group", are obliged to comply with the provisions of Part II of Law 4808/2021 on the prohibition, but also the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, which occurs in the course of work, whether related to or resulting from it, as specifically defined in the Articles of Part II of Law 4808/2021, for persons subject to the protection of the law.

In accordance with the provisions of Articles 9 and 10 of Law 4808/2021, the Group has the obligation:

- i. To adopt a policy to prevent and combat violence and harassment at work, within the meaning of Articles 3 and 4 of Law 4808/2021, stating zero tolerance of such forms of conduct, specifying the rights and obligations of employees and the Group to prevent and address such incidents or forms of conduct; and
- ii. To adopt a policy for the management of internal complaints about incidents of violence and harassment at work, within the meaning of Articles 3 and 4 of Law 4808/2021, which outlines the procedure for receiving and examining such complaints in a manner that ensures the protection of the victim and respect for human dignity.

2. Purpose and Scope

The purpose of the policy is to prevent and combat all forms of violence and harassment that occur on the course of work, whether it is carried out in the designated workplace or outside the workplace, including, but not limited to, private places where work is performed, during training activities, travel and work-related social events, through communications using technology, etc. The creation and consolidation of 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 is a key priority of the Group.

This policy applies to employees employed by the Group regardless of their contractual status, including those employed on a project contract, on a remunerated mandate, those employed through third party service providers, as well as persons attending training, including trainees and apprentices.

3. Zero Tolerance Statement on violence and harassment at work

The Group expressly and unequivocally declares that all forms of violence and harassment that occur in the course of work, whether related to or arising from work, including gender-based violence and harassment and sexual harassment, are strictly prohibited and expresses its commitment to address and eliminate them.

The Group is committed to receiving, investigating and handling any relevant complaint with zero tolerance for violence and harassment, with confidentiality and respect for human dignity.

4. Definitions

4. Definitions:

4.1. Violence and Harassment

According to the European Agency for Safety and Health at Work, violence and harassment means any behaviour, act or practice, or threats thereof, that aim at, result in, or are likely to result in physical or psychological harm, whether a single occurrence or repeated. This includes insults, threats, physical or psychological attacks by persons inside and outside the Group against one or more persons in the workplace. There may even be a racial or sexual dimension to violence. More specifically, sexual harassment is defined as unwanted conduct and any other physical or verbal act of a sexual nature related to sexual orientation, expression, identity or gender characteristics. Gender-based harassment refers to those manifestations of behaviour related to a person's gender that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment.

Workplace harassment is defined as repeated, unjustified behaviour towards an employee or a group of employees, or towards a third party (e.g. partner, supplier, provider, etc.) that endangers his/her health and safety, and offends his/her sexual characteristics.

Harassment can also include aggressive behaviour, both verbal and physical, as well as less obvious actions such as devaluing an employee's work, or social isolation in the workplace. Harassment often involves an element of improper use or abuse of power, from which victims may be unable to protect themselves.

Indicative behaviours involving violence and harassment of any kind in the workplace include:

- verbal violence such as abusive, insulting comments
- threats of all kinds
- degrading, insulting or humiliating behaviour

- cyberbullying
- systematic exclusion of a person from meetings of his/her work group
- physical violence and harassment with gestures (touching, pushing)
- retaliation or intimidation for reporting or threatening to report
- sexual harassment
- visual forms of harassment such as the display of sexually offensive electronic and printed graphic materials (e.g. E-mail, files, photographs, etc.)
- offering benefits (e.g. job advancement) in exchange for a sexual act
- disseminating malicious comments or insulting someone on the grounds of discrimination (including, but not limited to, age, gender, any disability, sexual preference, etc.)
- sexual innuendo etc.

The above examples are indicative and not exhaustive of the prohibited acts that fall within the definitions of violence and harassment. In this context, and in order to avoid misunderstandings and/or misinterpretations in the application of this policy, it is clarified that those behaviours that are within the limits of the managerial prerogative and concern the supervision of the employee, the evaluation of their work performance and their general work presence do not constitute violence and harassment.

4.2. Workplace

The workplace is defined as any place where the worker performs work, takes a break, in personal hygiene and care facilities, commuting to and from work, on business trips, in training facilities, at social events and work-related activities, including those enabled by information and communication technologies.

5. Measures for the Prevention, Control and Mitigation of Risks

5.1. Information and Awareness-Raising Actions

All employees and other persons covered by this Policy must comply with it.

The Group ensures an accessible, safe and friendly working environment where relationships between employees, partners/ associates, Management and Board members of the companies are characterised by mutual respect, courtesy, honesty, understanding, trust, cooperation and support. At the same time, within the framework of its capabilities, it shall take all appropriate measures and make all reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence.

It also posts digital material, in a website accessible to all employees (Employees Portal), to combat violence and harassment, ensuring that everyone is aware of the Group's policy and procedures

against incidents of violence and harassment and knows where to turn in case of violence or harassment.

The Group trains its executives for the purpose of recognition of violence and harassment at work to provide the necessary support to its staff and partners, while at the same time encouraging employees and other persons covered by this Policy to report incidents of violence and harassment in the workplace to which they happen to be witnesses.

To achieve two-way contact at all levels, all employees are provided with communication and information channels, including:

- the internal websites (Employee Portal),
- the employees of the Human Resources Division

5.2. Optional initial actions to deal with incidents of violence and harassment prior to recourse to the Reporting Channel for the management of named & anonymous reports

Employees are encouraged to be informed through communication channels regarding the Group's Policies and Procedures. If any employee of the Group with any contractual status believes that he/she has been subject to any form of violence or harassment and wishes to address the incident, he/she may follow the steps outlined below before resorting to the Reporting channel for the management of named and anonymous reports.

- He/she asks the person (or persons) creating the problem to stop.
- Discusses the problem with his/her supervisors or with an executive of the Human Resources Division.

5.3. Training

The Group shall provide employees with information material on the potential risks of violence and harassment in the workplace and any information on prevention and protection measures, procedures for submitting named and anonymous reports and dealing with such behaviours, as well as contact details of the relevant administrative and judicial authorities in accordance with the applicable provisions, while channelling it to its internal communication channels.

The Group shall train its employees to recognise discrimination, violence, sexual harassment, gender-based harassment and domestic violence so they are able to provide the necessary support to their employees and partners at an early stage.

5.4. Risk Assessment

The assessment of psychosocial risks, which include the risks of violence and harassment, is one of the Group's legal obligations to ensure health and safety of its employees, as well as of third parties employed on its premises. It has therefore incorporated the relevant parameters in the Occupational Risk Assessment Study.

5.5. Employee Support Programmes

The Group will further ensure a healthy work environment by providing specialised Employee Assistance Programs (EAPs) through an external specialised provider.

6. Reference Person and Contact Details

For any information, clarification, queries regarding this Policy, interested parties may contact via the reference person who is the Head of the Human Resources Division, currently represented by Mr Yiannis Parnis (Contact no. 210 8173136 - 6942401300 and/or via e-mail at yparnis@optimabank.gr with a distinctive subject title: Violence and Harassment at Work.)

7. Internal Complaints Management Procedure for Incidents of Violence and Harassment at Work

7.1. The Bank's system for receiving and managing named and anonymous reports.

Named and anonymous reports are submitted to the "Whistle Blowing" reporting channels for the managements of issues falling under misconduct, violence and harassment in the workplace.

If any employee believes that he or she has suffered an incident of violence and/or any form of harassment or has witnessed such behaviour in the workplace, the Group encourages the submission of named and anonymous reports.

The basic and inviolable principle is to protect confidentiality of the personal data of the persons submitting such reports / complaints and to ensure that their present position and their future professional development are not jeopardised as a result of any retaliation in accordance with the provisions of Ch. 8 of the present Policy. In any case, the Group shall ensure the protection of the personal data of the complainant /reporting person / respondent in accordance with the relevant Group Policies and Procedures and as required by law.

Any employee covered by this Policy can report an incident of violence and harassment using one of the following channels.

More specifically:

- by mail to post office box (Optima bank P.O. Box no. 61371, Hellenic Post (ELTA) of Maroussi, or
- by e-mail to the dedicated e-mail address of the Bank "whistleblowing@optimabank.gr"

Employees need to be encouraged to keep notes of all incidents and actions taken to stop incidents of violence and harassment, as well as any requests for support they have submitted to the Bank's internal communication channels.

In the case of an oral report, the complainant is encouraged to forward their report in writing and in detail in accordance with this policy and procedure.

In general, the submission of named reports is encouraged so that communication is possible and more information is provided if requested and necessary.

However, it is made clear that anonymous reports are treated with the same attention and weight as named reports.

In any case, the Group is committed to protect the anonymity and confidentiality of the complainant's data, as well as to ensure that his/her present position and future professional development are not compromised.

7.2. Assessment of confidential reports

The assessment of confidential reports of employees and third parties concerning the Group will be undertaken by the Whistleblowing Management Committee "**Reports Management Committee**", based on impartiality and the protection of the confidentiality of the personal data of victims and persons concerned.

The "**Whistleblowing Management Committee**" is composed of: the Head of Internal Audit, the Head of Human Resources, the Head of Compliance, the Head of Risk Management and the Head of Legal.

7.3. Investigating a Complaints Report

The "**Whistleblowing Management Committee**" investigates the credibility of the report based on the information provided and if the complaint is assessed as credible, it is referred to the Human Resources Division for further investigation.

The Human Resources Division, in cooperation with the relevant Divisions, immediately investigates the case, collecting data and findings, using all possible access to files, audiovisual material and any other appropriate means of investigation, in order to determine whether it is confirmed, as well as the severity of the situation.

Following the investigation by the Human Resources Division the **"Whistleblowing Management Committee"** is reconvened, in order to, after considering the information, recommend any necessary action against the person involved, in accordance with the Group's internal procedures. Persons who have submitted reports will be informed of the receipt of the report at regular intervals of the progress of the examination of their report. Upon completion of the investigation, the Head of Human Resources Division shall communicate the results of the investigation as soon as possible and appropriate.

Reports, complaints which - in the context of the application of the procedures of this policy - are found to be manifestly malicious will be considered inadmissible and will be investigated further at the Committee's discretion, both as to the motives and the parties involved. In the case of proven malicious complaints, the "Whistleblowing Management Committee" will recommend to the Human Resources Division any necessary action against the person involved.

7.4. Temporary Measures in favour of the Complainant

The Human Resources Division shall, if necessary and in agreement with the complainant, take measures to protect the complainant until the complaint/report is fully investigated.

Indicative measures include granting the complainant special paid leave or teleworking depending on the nature of their duties or internal transfer to another department.

8. Protection against acts of retaliation

The Group is committed to protecting employees who have made a report in good faith from any acts of retaliation.

The Group will never retaliate or allow retaliation against the complainant in the event of violence or harassment. In particular, any unfavourable treatment of the complainant is prohibited, if it constitutes vindictive behaviour or countermeasure within the meaning of Article 14 of Law 3896/2010. Early termination or in any way termination of the legal relationship on which the employment is based is invalid if it constitutes retaliatory conduct or countermeasure within the meaning of Article 14 of Law 3896/2010 for an incident of violence and harassment under Article 4 of Law 4808/2021.

9. Penalties against the Respondent

In case of confirmation of complaints regarding the violation of the principles of the Policy on the Prevention and Combating of Violence and Harassment at Work, the Human Resources Division takes all necessary measures in accordance with the Group's internal procedures.

In particular, the necessary appropriate and proportionate measures are taken against the

respondent to prevent a similar incident or behaviour from recurring.

Measures include a recommendation for compliance, change of position, working hours, place or manner of work, and disciplinary sanctions as determined in order of priority or according to the seriousness of the misconduct and include:

- a) Oral warning
- b) Written warning
- c) Written reprimand
- d) A fine of up to 25% of daily earnings
- e) Temporary cessation of work for up to 3 months, without remuneration
- f) Termination of employment contract.

10. Rights of Victims

This Policy is applied in parallel with the applicable legislation on the protection of human dignity and does not affect the legal rights of any employee in terms of civil and criminal law, as well as the rights to submit a complaint before the authorities of the competent Audit Authority.

In particular, every employee has the right to:

- **Submit a complaint within the Bank through the official channels** mentioned in section 7.1
- **Contact the Labour Inspectorate** at the Citizen Service Hotline at 1555 and the SEPE Complaints Hotline 15512
- **Contact the Greek Ombudsman**, email: press@synigoros.gr, 213 1306 600

The Group is also committed to provide assistance and access to any competent public, administrative or judicial authority in the investigation of any incident of violence and harassment in the workplace.

11. Evaluation and Optimisation of Policy

The Group is committed to evaluating this Policy in a manner consistent with the requirements of applicable laws and regulations, ensuring that it is kept up to date with relevant developments. The Group shall post this Policy and Procedure in all internal communication channels so that all employees can be aware of it.