



HELLENIC WASTE
RECYCLING

Policy on the Prevention & Addressing of Violence & Harassment in the Workplace



Policy on the Prevention & Addressing of Violence & Harassment in the Workplace



1. Purpose

This Policy aims to define the fundamental principles adopted by HELLENIC WASTE RECYCLING S.A. for the prevention, monitoring, and handling of all forms of violence and harassment in the workplace, including gender-based violence and harassment, sexual harassment, and any other form of harassment occurring in connection with work or arising in the course of employment. This applies to incidents that take place during work, are related to work, or result from work, as provided for in **Articles 58–69, 507–508, 533, and 537 of Presidential Decree 62/2025, as well as Ministerial Decision 95/2026.**

2. Scope of Application

This Policy applies to all individuals, regardless of their contractual status, including those engaged under project-based contracts, independent service agreements, fixed-term mandates, workers employed through third-party service providers, as well as individuals participating in training programs, including trainees and apprentices, volunteers, and job applicants.

This Policy covers all persons protected under the law, namely:

- ✓ Employees under employment contracts
- ✓ Individuals engaged under project-based contracts or independent service agreements
- ✓ Workers employed through third-party service providers
- ✓ Temporary agency workers
- ✓ Seconded (loaned) employees
- ✓ Trainees, apprentices, and interns
- ✓ Volunteers
- ✓ Job applicants
- ✓ Former employees whose employment relationship has ended

For the purposes of applying this Policy, the Company takes into account that:

- ✓ For the calculation of the threshold of **20 employees**, temporary agency workers and seconded (loaned) employees are also included.

In cases of temporary employment or secondment, Hellenic Waste Recycling fully ensures the protection of workers within its premises, while any disciplinary procedures are coordinated with the direct employer.

The legislative framework of the new law addressing these behaviors goes beyond the mere “prohibition” of all forms of violence and harassment in the workplace, focusing both on prevention and on the effective handling of such incidents.

3. Definitions

Violence and Harassment

The term “violence and harassment” in the workplace refers to a range of unacceptable behaviors and practices, or threats thereof, whether occurring as a single incident or repeatedly, which aim to, result in, or are likely to result in physical, psychological, sexual, or economic harm, and includes gender-based violence and harassment.

Violence and Harassment in the Workplace

Violence and harassment in the workplace are understood as any form of unacceptable behavior or practice, whether isolated or repeated, that may cause physical, psychological, sexual, or economic harm.



Gender-Based Violence and Harassment

Behavior directed at individuals because of their gender, or behavior that disproportionately affects persons of a particular gender, including sexual harassment.

Harassment Based on Gender

Behavior related to a person's gender that creates an intimidating, hostile, or degrading environment, including sexual harassment.

Domestic Violence

Acts of physical, psychological, sexual, or economic violence that occur within the family context, regardless of biological or legal family ties, or between former or current spouses or partners, and regardless of whether the perpetrator shares or has shared the same residence with the victim.

4. Policy on the Prevention & Combatting of Violence & Harassment

This Policy aims to define the fundamental principles adopted by HELLENIC WASTE RECYCLING S.A. for the prevention, monitoring, and handling of all forms of violence and harassment in the workplace, including gender-based violence and harassment and sexual harassment, as provided for in **Articles 58–69, 507–508, 533, and 537 of Presidential Decree 62/2025 and Ministerial Decision 95/2026.**

HELLENIC WASTE RECYCLING S.A. complies with all measures and obligations related to the implementation of the provisions of Ministerial Decision 95/2026, **Articles 58–69, 507–508, 533, and 537 of Presidential Decree 62/2025, as well as Part II of Law 4808/2021**, regarding the prevention and combatting of all forms of violence and harassment in the workplace, including gender-based violence and harassment and sexual harassment.

The purpose of this Policy is to create and maintain a working environment that respects, promotes, and safeguards human dignity and the right of every individual to a workplace free from violence and harassment.

HELLENIC WASTE RECYCLING S.A. recognizes and respects the right of every employee to a work environment free from violence and harassment and is committed to creating and maintaining a workplace that upholds human dignity, equality, and professional integrity. The Company explicitly declares zero tolerance for any form of violence, harassment, bullying, or abusive behavior.

This Policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the implementing regulatory framework thereunder, and covers the persons referred to in paragraph 1 of Article 3 of Law 4808/2021, as well as Ministerial Decision 95/2026.

Any person who experiences an incident of violence or harassment has the right to seek both judicial protection and recourse before the Labour Inspectorate and the Greek Ombudsman, as well as to submit a complaint within the Company.

5. Measures for the Prevention and Combatting of Violence and Harassment in the Workplace at HELLENIC WASTE RECYCLING S.A.

The identification and assessment of risks are conducted in detail within the Company's Occupational Risk Assessment Study, which is systematically monitored by the Safety Technician and the Occupational Health and Safety Management System Manager of the Company.

5.1 Risk Assessment of Violence and Harassment in the Workplace

The risk assessment for violence and harassment in the workplace has been incorporated into the Company's existing Occupational Risk Assessment Study. According to this assessment, exposure of an employee to a dangerous situation involving violence and harassment in the workplace may result in physical, psychological, sexual, or economic harm, undermining the individual's dignity, including gender-based harassment, and may occur within the workplace, during work-related travel, and in communications related to work, outlining the minimum procedures that must be followed.

HELLENIC WASTE RECYCLING S.A. integrates the evaluation of violence and harassment risks into its Occupational Risk Assessment Study, taking into account:

- ✓ The nature of the work



- ✓ Working conditions (shifts, night work, workplaces, etc.)
- ✓ Vulnerable groups of workers
- ✓ Psychosocial risks

The Company may use digital risk assessment tools, such as the **OIRA platform (EU-OSHA)**.

5.2 Measures for the prevention, control, mitigation, and handling of violence and harassment risks in the workplace, as well as for monitoring such incidents or behaviors

More specifically, within the framework of this Policy, HELLENIC WASTE RECYCLING S.A.:

- ✓ Encourages staff to maintain a working climate in which respect for human dignity, cooperation, and mutual support are fundamental values.
- ✓ Promotes open communication with the employer, direct supervisors, and colleagues.
- ✓ Provides all employees with access to this Policy and the related procedures.
- ✓ Encourages training, information, and awareness-raising activities for staff on issues of violence and harassment in the workplace so that they can properly perform their duties, particularly in job positions that involve a higher risk of exposure to incidents of violence and harassment.
- ✓ Encourages employees to report and formally raise such incidents.
- ✓ Maintains a procedure for handling reports/complaints.
- ✓ Protects individuals who submit complaints and strictly prohibits any form of retaliation or adverse treatment.
- ✓ Monitors, through the applicable Management Systems, the implementation of preventive measures against violence and harassment in the workplace.
- ✓ Guides and supports victims of violence and harassment, as well as victims of domestic violence, to facilitate their reintegration into the workplace.
- ✓ Trains employees in the procedures for handling incidents of violence.
- ✓ Regularly evaluates the effectiveness of the preventive and response measures in place and proceeds with the review and updating of the risk assessment and related measures as necessary.
- ✓ Appoints the Occupational Health and Safety Management System Manager as the designated “Contact Person” responsible for guiding and informing employees regarding the prevention and handling of violence and harassment in the workplace.

5.3 Information and Awareness-Raising Actions for Staff

HELLENIC WASTE RECYCLING S.A., through its Human Resources Department, organizes targeted staff meetings to discuss relevant issues and ensure the timely identification and management of potential risks.

In addition, the Company encourages the participation of employee representatives and management executives in training programs and professional development seminars related to the identification and management of violence and harassment risks in the workplace.

Indicative actions include the following:

- ✓ **Posting of this Policy and the available procedures**, as well as contact details of the competent authorities, **in a publicly accessible online space for all employees and third parties**, in accordance with applicable legislation, at the website www.hellenic-recycling.gr in both Greek and English.
- ✓ **Posting of this Policy**, the available procedures, and the contact details of the competent authorities, in accordance with applicable legislation, at an **accessible location within the workplace in printed form**, in both Greek and English.



- ✓ Scheduling of specialized on-site training sessions at plants and other workplaces, both within and outside the Company's headquarters.
- ✓ Encouragement of staff participation in awareness-raising and training programs, either in person or through e-learning platforms.
- ✓ Development of targeted training programs for employees in managerial and supervisory positions.

5.4 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 of Their Responsibility, in the Event of an Incident, Report, or Complaint of Such Conduct, and on the Relevant Procedure

The Company informs its personnel that, in the event that a person is affected by an incident of violence and harassment during access to employment, in the course of employment, or even after the termination of the contract or employment relationship within which the incident or behavior is alleged to have occurred, that person has:

- ✓ The right to judicial protection,
- ✓ The right to lodge an appeal, submit a complaint, and request the initiation of a labor dispute procedure before the Labour Inspectorate, within the scope of its legal competencies,
- ✓ The right to file a report with the Greek Ombudsman, within the scope of its legal competencies, and
- ✓ The right to submit a complaint within the Company in accordance with the internal complaints management policy.

In any case where a report or complaint concerning such conduct arises within the Company, the affected person retains the right to seek recourse before any competent authority; the contact details of the relevant authorities are provided below.

5.4.1 Rights and Obligations of Employees

Every employee has the right to:

- ✓ Be treated with respect and courtesy.
- ✓ Not be subjected to violent behavior, harassment, including sexual and gender-based violence, adverse discrimination, or bullying.
- ✓ Report any incident of prohibited conduct in the workplace (in accordance with this Policy, as analyzed herein) without being victimized or suffering any adverse consequences or retaliation.
- ✓ Request and receive information regarding the Policy on the prevention and combatting of violence and harassment in the workplace, their rights and obligations arising from the law, as well as the consequences in case of violation of the relevant legislation, as applicable in each case.

Every employee is obliged to:

- ✓ Comply with this Policy and all applicable procedures in force, for both their own protection and that of other persons employed by the Company.
- ✓ Immediately report any incident of violence and harassment to their direct supervisor.
- ✓ Cooperate in the event of an investigation into a complaint submitted in accordance with the procedure described below.
- ✓ Participate in awareness-raising and training actions and programs related to incidents of violence and harassment.



5.5 Appointment of a Contact Person (“Liaison Officer”) for Guidance and Information of Employees on the Prevention and Handling of Violence and Harassment in the Workplace

Employees may raise concerns or address issues through the Occupational Health and Safety Management System Manager of the Company, who is designated as the contact person for such matters.

The role of this person is advisory and consists in guiding and informing employees, regardless of whether they are approached in relation to a specific incident or complaint of violence and harassment.

In the exercise of the above duties, the Employer, the Occupational Health and Safety Management System Manager, and any person involved commit to receiving and not obstructing the receipt of complaints, to promptly investigating and managing any such report, to examining and assessing the allegations impartially and with respect for human dignity, and to taking immediate measures to protect the affected person.

Through this Policy, HELLENIC WASTE RECYCLING S.A. informs that the affected person has the option, at any stage and irrespective of the internal procedure followed within the Company, to also submit a complaint to the competent authorities and to the courts at their discretion.

5.6 Communication Channels for Reports / Complaints

Within the framework for receiving complaints, the following communication channels with the Occupational Health and Safety Management System Manager are available for reporting incidents of violence and harassment in the workplace, as well as any deviations from the HELLENIC WASTE RECYCLING Code of Conduct and Business Ethics.

Communication may be made either anonymously or by name through:

- ✓ The Company’s website: <https://hellenic-recycling.gr>
- ✓ Sending an e-mail to: Report.hellenicWrecycling@gmail.com
- ✓ Sending a letter to the address:
“HELLENIC WASTE RECYCLING S.A.”, 100 Diulistirion Street, PC 133 41 Ano Liosia, Fyli,
addressed to the Occupational Health and Safety Management System Manager and marked “**Confidential.**”
- ✓ **Orally**, by contacting the Occupational Health and Safety Management System Manager.

5.7 Protection of Employment and Support for Employees Who Are Victims of Domestic Violence, to the Extent Possible, Through Any Appropriate Means or Reasonable Adjustment

Indicative actions by HELLENIC WASTE RECYCLING S.A. include the granting of special leave or flexible working arrangements upon request of an employee who is a victim of domestic violence, with the aim of supporting them in maintaining their employment and facilitating their smooth reintegration after such incidents, particularly in cases involving minor children or children with disabilities or serious illnesses.

6. Procedure for Receiving and Examining Complaints

Through the D04 Complaints and Disciplinary Sanctions Procedure, HELLENIC WASTE RECYCLING S.A. informs employees about:

- ✓ The available communication channels and the responsible persons, namely the Management Systems Department and the designated Contact Person (Occupational Health and Safety Management System Manager).
- ✓ The investigation and examination of complaints with impartiality, ensuring the protection of confidentiality and the personal data of both victims and complainants.
- ✓ The prohibition of retaliation against the affected person, in accordance with Ministerial Decision 95/2026, Article 13 of Law 4808/2021, and applicable labor legislation.
- ✓ The description of the consequences in case violations are established.



Such measures may include a compliance recommendation, a change of position, working hours, workplace or working arrangements, or the termination of the employment or cooperation relationship, subject to the prohibition of abuse of the right under Article 281 of the Civil Code.

- ✓ Cooperation and provision of any relevant information to the competent authorities, if requested.

7. Contact Details of Competent Authorities

Competent Contact Numbers:

- ✓ **SEPE – Labour Inspectorate – Directorate of Social Inspection:** Tel. 1555
- ✓ **Greek Ombudsman:** Tel. 213-130-6600
- ✓ **Hellenic Police:**
Call 100 (operates 24/7).
- ✓ **Domestic Violence:**
For further information, please visit the relevant webpage of the Hellenic Police on domestic violence.
- ✓ **General Secretariat for Demography, Family Policy and Gender Equality (GSGE):**
 - National SOS Hotline: **15900** (operates 24/7)
 - Electronic contact for women is available via e-mail: sos15900@isotita.gr





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