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## ADOPTION OF MEASURES AND REGULATIONS ON HARASSMENT AND VIOLENCE AT WORK

Issue number	Date of Issue	Modifications
1.0	April 2023	New Version

**Implementation date** April 2023

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## **PART I: 'POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT'**

### **INTRODUCTION**

The purpose of this policy is to prevent and combat all forms of discrimination based on personal characteristics and choices, as well as all violence and harassment that occurs in the course of employment, whether related to or arising from it.

The company under the name "**KALTEQ SA**" (hereinafter "the Company") declares that it recognizes and respects the right of every person to a work environment free of violence and harassment and that it does not tolerate any such behavior, in any form, by any person.

The Company complies with all measures and obligations relating to the application of the provisions of Part II of Law no. 4808/2021 on the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

The Company, in compliance with the provisions of Law 4808/2021, has established the "Policy for the Prevention and Combating of Violence and Harassment" (hereinafter "the Policy"), the main purpose of which is to create and consolidate a working environment that respects, promotes and safeguards human dignity and the right of every person to a work environment free of violence and harassment.

### **A. Specific Objectives of the Policy**

The Policy aims to prevent and address violence, harassment and sexual harassment and in particular:

- To inform the Company's employee(s) regardless of the type of contract they have with the Company or the position they hold regarding the concepts of "violence and harassment", "harassment" and "sexual harassment", about the protection provided by the applicable legislation against conduct that may constitute sexual harassment or harassment, their rights whenever they may be subjected to violence or harassment or sexual harassment and the actions to be taken when they have a

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reasonable belief in the circumstances that they are victims of harassment or sexual harassment.

- To encourage the Company's employees, regardless of the type of contract they have with the Company or the position they hold, to participate and contribute to the prevention and treatment of violence, harassment and sexual harassment in the workplace and to the creation of a friendly working environment for all employees regardless of gender or sexual orientation.
- To promote the education and training of employees/employees of the Company regardless of the type of contract they have with the Company or the position they hold in relation to the importance of:

(a) the principle of equal treatment between men and women,

(b) the prohibition of discrimination on the grounds of sex or sexual orientation; and

(c) the prevention, treatment and combating of violence, harassment or sexual harassment.

- To promote cooperation between the management and the employees/workers of the Company in order to maintain a healthy and safe working environment with particular and constant characteristics of mutual respect, courtesy, honesty, understanding and mutual support.
- To provide immediate protection to any worker/employee who has a reasonable belief in the circumstances that he/she is being or has been subjected to sexual harassment or harassment or sexual harassment and from possible retaliation against him/her, due to repulsion of harassment or sexual harassment or the filing of a complaint of harassment or sexual harassment that takes place at work (workplace, travel to and from work, work-related communications).
- To define the obligations of management whenever it suspects an incident of violence, harassment or sexual harassment or becomes aware of such an incident or receives a complaint.
- To guide management in dealing properly and promptly with allegations of violence, harassment or sexual harassment and to protect victims and other parties involved in the investigation of any complaint.

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## **B. Declaration - Commitment of the Company**

The Company, as a first step in expressing its commitment to addressing sexual harassment, harassment and violence, makes a Policy Statement which provides that:

- Gender discrimination, violence, harassment and sexual harassment are strictly prohibited.
- Employees, workers regardless of their contractual/employment status and the Company's management have an obligation to comply with and support everything provided for in the Policy.
- Employees, workers regardless of their contractual/employment status and the Company's management have a duty of full confidentiality if they submit information as part of a complaint investigation. Commenting on confidential information and/or spreading rumors will not be tolerated.
- Employees regardless of their contractual/employment status and the Company's management, as well as job applicants and other persons cooperating with the Company, have the right to be treated with equality and dignity.
- Violence, harassment and sexual harassment in the workplace will not be permitted or tolerated and the Company will take appropriate measures to this end, as provided for by the relevant legislation and the Policy.
- Complaints of violence, harassment or sexual harassment will be handled promptly, seriously and in complete confidentiality.
- Employees, workers regardless of their contractual/employment status and members of the Company's management will be protected from victimization, adverse treatment and detrimental change of work conditions as a result of their contribution in any way (e.g., reporting, testifying) to the investigation of a complaint of violence, harassment or sexual harassment.
- Any deviations from the Policy will have consequences for the perpetrators that can go as far as dismissal.

**The Policy is communicated to all employees and other associates of the Company and is posted in a prominent place on the Company's premises and on its website.**

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## SCOPE OF THE POLICY - PERSONS CONCERNED

**Persons:** 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 paragraph 1 of Article 3 of Law 4808/2021. That is to say, it applies to employees and persons employed under a contract for work, independent services or a paid mandate, employees through third-party providers and apprentices.

**Place:** The Policy applies both in the workplace and in places associated with company meetings, conferences and work-related events, whether on or off Company premises, or in work-related communications online or by telephone.

## FORMS OF HARASSMENT - BULLYING AND SEXUAL HARASSMENT

### A. Definitions

"Violence and harassment" at work are described in Article 4 of Law 4808/2021:

(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, dehumanising 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 (A' 107) and par. 2 of Article 2 of Law No. 4443/2016 (A' 232). These forms of conduct include sexual harassment under Art. 3896/2010, as well as forms of conduct related to the sexual orientation, expression, identity or gender characteristics of the person.

Harassment and bullying are therefore defined as unwanted behavior by a person that is intimidating, malicious, annoying, offensive, humiliating or degrading to another person.

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It can be related to, but not limited to, the other person's age, gender, sexual preference, race, disability, religion or beliefs and can be a repeated or isolated incident. It can be verbal, non-verbal, physical and it may not always be face-to-face.

## **B. Forms of harassment-bullying**

Indicative and not limiting examples of bullying in the workplace are the following behaviors:

- Dissemination of false allegations
- Making offensive or aggressive comments about the personal lives of others
- Circulation or mere display of offensive or obscene material
- Obscene or rude gestures or unwanted physical contact or persistent offers to meet or communicate or threats if not accepted.
- Use of physical violence, including sexual assault
- Targeting with shouting and anger
- Repeated exclusion and exclusion from corporate processes and social events
- Suspicions or signs that the worker should quit his or her job
- Repeated and constant reminder of errors and omissions with derogatory characterisations
- Consequential criticism of one's work and effort without being directly linked to the outcome of the effort
- Pranks and jokes from third parties who do not like the particular person
- Making false allegations against a person
- Removing important areas of responsibility and replacing them with trivial or insignificant tasks

**It shall not constitute harassment:**

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- Justifiable and reasonable actions taken by employees and appointees of the Company in the performance of their duties to transfer, demote, exercise disciplinary authority, provide advice, instruction or direction, or terminate an employment or project or partnership contract without violating the rules of propriety.
  - Reasonable and justifiable decisions by the Company or its officers not to promote, transfer or provide benefits related to an employee's employment.
  - Any justifiable and reasonable action of the Company and/or its executives, as to the place, time, manner and type of work related to the performance of the employee's duties, in the context of the exercise of managerial right and without violating the rules of decency.

**What needs to be stressed is the undesirability of the behavior. None of the above conduct constitutes sexual harassment if it is not unwanted by the recipient or if it is not of such a form and nature that it violates the dignity of men and women. If the conduct is acceptable and is done with the consent of the parties, then there is no question of sexual harassment.**

It is clear that the intention (good or bad, innocent or guilty, suspected or unsuspected) of the perpetrator is completely irrelevant and of no importance. Good intent does not negate conduct that constitutes sexual harassment.

The Company, within the framework of its capabilities, takes all appropriate measures and makes all reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence.

### **Impact of violence and harassment at work (risk assessment)**

#### **i) For victims of violence and/or harassment**

- Anxiety, sleep disorders, post-traumatic stress syndrome.
- Inability to work, loss of self-esteem and self-confidence.
- Reduced performance and efficiency.
- Feeling socially isolated at work.

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- Physical symptoms of anxiety, such as headaches, backaches, stomach cramps; - Panic attacks, severe fatigue.
  - Deterioration of personal relationships.
  - Depression.

## **ii) For the Company**

- Increased staff turnover, training costs for new staff.
- Deterioration of interpersonal relationships.
- Unsafe environment and negative working climate.
- Negative public image, reducing the trust of potential and existing customers and the public in general

Guidance for employees and management on preventing and responding to harassment and sexual harassment.

## **A. Guidelines to prevent sexual harassment, harassment and violence.**

- Seek comprehensive and objective information on legislation on violence, harassment and sexual harassment and protection mechanisms
- Participate in actions and programs to combat the causes of gender discrimination, stereotypes and prejudices that perpetuate violence, harassment and sexual harassment
- Avoid conversations, comments, insinuations, gestures, expressions that target or refer to the gender or sexual orientation or gender identity of any person
- Correct your behavior when you perceive that it is annoying or offensive to another person and do not hesitate to apologise
- Set individual boundaries with others when you have evidence of behavior that bothers or offends you
- Work with management to improve the working environment and implement the Policy.

## **B. Guidelines for dealing with violence, harassment and sexual harassment**



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- Do not ignore or underestimate the unpleasant feelings it causes you.
  - Trust your assessment of the behavior of the person who is harassing you.
  - Do not feel uncomfortable, ashamed or blame yourself for the behavior of the perpetrator (male or female).
  - Do not choose isolation.
  - Do not justify the behavior of the perpetrator (male or female).
  - Take responsibility for doing the right thing:
  - Set your limits on the perpetrator (male or female).
  - Resist or deal with his/her behavior calmly and firmly.
  - If, despite your efforts, the person continues to harass or sexually harass you, tell someone you trust and also talk to your family.
  - Keep a diary with details of incidents of violence, harassment or sexual harassment.
  - Inform the designated "Reference Person" at the enterprise level.
  - Submit a written complaint or grievance to the "Reference Person" responsible for providing guidance and information, stating specifically and objectively what has happened, when and where. Use the "Complaint Form" at the end of this document (Appendix A) for this purpose.
  - Consult the inspectors of the Labour Inspectorate (ΣΕΠΕ).

## **DUTIES AND RESPONSIBILITIES OF THE COMPANY**

### **A. Ensuring a decent and safe working environment**

The Company:

- Recognises that harassment and sexual harassment are forms of gender-based violence and constitute prohibited sex discrimination (or other discriminatory grounds) at work.

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- Recognises that violence is a prohibited form of behaviour/practice whether it is work-related or results from work.
  - It has a legal responsibility to ensure a safe, decent, healthy and friendly working environment.
  - It is responsible for preventing and responding to violence, harassment and sexual harassment.
  - Recognises the need to support the employment of domestic violence workers

## **B. Measures taken by the Company to prevent violence, harassment and sexual harassment**

Historically, no incidents of violence, harassment or sexual harassment have occurred in the workplace or in connection with work at the Company. Therefore, in order to prevent violence, harassment and sexual harassment, the Company takes the following measures related to the information and awareness of all persons covered by the Policy. Should working conditions change significantly in the future or relevant incidents occur, the Company will proceed with a new risk assessment and possible additional countermeasures.

### **In detail, the Company takes the following measures:**

- The Company shall communicate the Policy to the employee(s), the management and third parties concerned, in writing or otherwise, and shall ensure that violence, harassment and sexual harassment in the work environment is not acceptable, taking action in any case where any of the above do not comply.
- Ensuring an accessible, safe and friendly working environment, where relationships between all persons concerned are characterised by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.
- The company designates the compliance officer of the company level as the reference person, responsible for guiding and informing employees on the prevention and response to violence and harassment at work. The role of the reference person is informative and consists of guiding and informing employees, whether or not they

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are contacted in response to an incident or complaint of violence and harassment. The reference person shall be obliged to protect personal data that may come to his/her knowledge in the course of his/her role.

- The company shall provide 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 degree of their responsibility, in the event of the occurrence or reporting or complaining of such incidents, and on the relevant procedure for receiving and investigating complaints. In particular, any person affected by an incident of violence or harassment in access to 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 ended, has the following possibilities: 4.1) recourse to judicial protection; 4.2) filing a complaint with the Labour Inspectorate within the scope of its statutory powers; 4.3) filing a report with the Ombudsman within the scope of his/her statutory powers; and 4.4) filing a complaint within the company, in accordance with the complaint management policy. The contact details of the competent authorities are as follows:
  - Ombudsman line: 213 13 06 600 (e-mail: [press@sinigoros.gr](mailto:press@sinigoros.gr)),
  - Labour Inspection Line via the Citizens' Hotline 1555 (e-mail: [helpdesk@sepenet.gr](mailto:helpdesk@sepenet.gr)),
  - SOS 15900 line for immediate psychological support and counselling for women victims of gender-based violence.

## **MANAGEMENT OF INTERNAL COMPLAINTS**

### **Ensuring that there are no adverse consequences against any person who reports behaviour that constitutes acts of violence or harassment**

The Company expressly and unequivocally assures those who intend to file a complaint related to this Policy that they will not suffer any adverse treatment as a result of such action. No action will be taken against a person who makes any complaint in good faith, even if the facts reported therein are not verified on the basis of a comprehensive investigation. Harassment, intimidation or any other adverse treatment in retaliation against a person who has filed a complaint under this Policy will not be tolerated by the Company in any circumstances.

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**Unacceptable retaliation may include, but is not limited to, the following:**

- Termination of employment contract.
- Non-renewal of a fixed-term employment contract.
- Arbitrary transfer of the complainant to another position as a result of the incident complained of or an unjustified refusal to transfer requested by the complainant.
- Undue restriction or enlargement of the complainant's duties or an unfavorable change in the scope of his/her work.
- Denial of opportunities and education.
- Arbitrary exclusion from company benefits.
- Arbitrary reduction of remuneration
- Verbal or written harassment or bullying.

In the event that the complainant believes that he or she has been subjected to any retaliation as a result of a complaint under this Policy, he or she should immediately inform the compliance officer and the compliance officer should initiate an investigation process as set out in this Policy.

The Company shall take all necessary steps to restore the appropriate environment of cooperation for any employee or partner or contractor found to have been subjected to any form of retaliation. The above shall also apply to those employees who testify as witnesses in the relevant complaint review proceedings and to those investigating such proceedings.

**Ensuring confidentiality**

All complaints and investigations are treated confidentially to the extent possible and information is disclosed strictly and only on a need-to-know basis. It is noted that disclosure of the identity of the complainant may be required by a Court or other public authority as part of the investigation of the case. The identity of the complainant is usually disclosed to the parties involved during the investigation and the Complaints Manager takes appropriate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information relating to a complaint or investigation under this Policy will be maintained in secure files in the Core Compliance function. The retention

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and processing of personal data will be carried out in accordance with the applicable data protection legislation

The Company, in compliance with article 10 of Law 4808/2021, has established clear procedures for dealing with violence, harassment and sexual harassment. These procedures ensure that problems are resolved in a prompt and effective manner. The procedure for resolving any such problem can take either an informal or formal form.

### **Informal complaint procedure**

If the harassed person wishes to resolve the matter informally, the Complaints Manager:

- Shall give the alleged harasser an opportunity to respond to the complaint in case the alleged harasser falls within the scope of this Regulation.
- Ensures that the alleged harasser understands the reporting mechanism.
- Facilitates communication between the two parties where they fall within the scope of this Agreement to reach an informal resolution acceptable to the complainant.
- Ensures that confidential records are maintained in accordance with the Company's necessary security standards.
- Monitors the outcome of the process to ensure that the unacceptable behavior has been terminated.
- Ensures that all of the above is completed within 10 working days of the complaint being made

### **Formal complaint procedure**

Once any formal complaint has been made, (by sending a form to the " reference person"), the following investigation procedure will be followed:

#### **The reference person:**

Acknowledges receipt of the complaint to the complainant on the same or the next working day after receipt.

- Ensures that confidential records are maintained in accordance with the Company's necessary security standards.

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- Informs the members of the Committee of the content of the complaint. They shall investigate whether the complaint falls within the scope of this Policy and whether the complaint is admissible or manifestly unfounded.

1. **In case of rejection of the complaint**, the reasons shall be communicated in writing to the complainant within ten (10) working days from the submission of the complaint and shall relate to cases where:

- The reported acts do not meet the definition of violence and/or harassment.
- The complaint does not contain sufficient information to substantiate the allegation.

After the initial check, the members of the Committee proceed to investigate the complaint.

**If the complaint is directed to one of the investigators, a conflict of interest situation exists, and then this member shall not participate in the investigation of the complaint and shall be replaced ad hoc by a person appointed by the Company's Management.**

The Committee decides on the validity or otherwise of the complaint under investigation and recommends the appropriate response measures to the President of the Company, so that he can take the necessary final decisions.

Decisions of the Complaints Review Committee shall be reasoned, taken by majority vote and communicated to the complainant.

The Complaints Review Committee consists of the members of the Board of Directors, the Director of Human Resources and the company's Legal Advisor

#### **The complainant:**

- May (at its own request or at the Committee's invitation) be invited to participate in a Committee meeting in the context of the investigation. If he/she requests to attend, he/she will be invited to attend in order to present the contents of his/her complaint and to provide any necessary clarification at a mutually agreed time.
- He/she shall be informed no later than 15 days after receipt of his/her complaint of the progress and outcome of the investigation, in an appropriate manner, taking into account in particular any legal obligations of confidentiality that may apply

#### **Response measures**

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In the event that violence or harassment is confirmed as set out in this Policy, one of the following response measures will be taken on a case-by-case basis - if the respondent falls within the scope of this Policy:

- an oral or written recommendation,
- an oral or written reprimand,
- termination of employment or cooperation and, in addition, where appropriate, a change in the position, working hours, place or manner of work of the respondent.

The choice of the appropriate response depends on the severity, nature and extent of the harassment. Appropriate and proportionate repressive and/or deterrent measures will be applied to ensure that incidents of violence or harassment are treated as highly significant.

In serious cases, including physical violence, the harasser's employment or cooperation will be terminated immediately. Details of any repressive or deterrent action taken by the Company against the alleged harasser will be provided to the complainant if deemed appropriate by the Complaints Review Committee.

**Not satisfied with the outcome of the investigation of the complaint.**

If the complainant is not satisfied with the outcome of the investigation, he/she may address the President of the Company stating the reasons for his/her dissatisfaction. The President shall respond in writing, informing the Company of the acceptance or rejection of any request to investigate the complaint further.

**The Company shall ensure that the internal/informal procedure for reviewing complaints of violence, harassment or sexual harassment:**

- Is clear, it has been explained and it is understood by all persons concerned.
- It shall be carried out confidentially and objectively.
- Provides sufficient guidance and support to the respondent.
- Approaches and treats the complainant and the respondent with respect.
- Neither the complainant nor the respondent is victimized;
- Any witnesses are not victimized.
- Produces results within a reasonable time from the date of the complaint.

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- Encourages the complainant to report incidents of violence, harassment or sexual harassment either verbally or in writing.
  - It recommends that the complainant should take care to keep any evidence he/she may have concerning his/her conduct and the conduct of the respondent.
  - Asks the complainant if he/she wishes to deal with the situation himself/herself or if he/she needs assistance.
  - Informs the complainant of his/her right to file a formal complaint.
  - If necessary, and without stigmatising the parties involved, they shall avoid professional cooperation with each other and/or move away if they are in nearby offices or on the same floor.

The internal/informal procedure does not involve the filing of a complaint. It is about making a complaint and in NO WAY replaces the formal procedure for filing and reviewing a complaint of violence, harassment or sexual harassment. The complainant may at any stage of the internal/unofficial procedure, if he/she wishes, proceed to an internal/unofficial procedure and with a complaint to the institutions of the state or judicial action.

### **Criminal and civil proceedings**

In particular, a victim of sexual abuse has the right to bring separate criminal or civil charges against an alleged perpetrator. The victim's legal rights are in no way limited or affected by this Policy.

It is understood that this Policy is applied in parallel with the legislation in force for the protection of the employee's/partner's/apprentice's personality and does not affect his/her legal rights, nor the right to lodge a complaint before the competent supervisory authorities.

Retaliation and victimisation of the complainant who has exercised his/her legal rights and made a complaint about an incident of violence and harassment is prohibited. Retaliation and victimisation of the complainant shall constitute a serious breach of this Policy and shall entail consequences for anyone acting in this way.

### **DEFINITION OF 'REFERENCE PERSON'.**

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The Company in compliance with article 9 of Law 4808/2021, has appointed as a Reference Person the Compliance Officer who, in addition to his/her responsibility at company level, is responsible for the guidance and information of employees on the prevention and treatment of violence and harassment at work, will also be responsible for the initial receipt of potential formal and informal complaints and their support and, after completing his/her investigation, he/she will draw up a report, which will be submitted to the Board of Directors for appropriate action to be taken against the alleged perpetrator of the harassment or incident of violence. In the case where the alleged perpetrator is a member of the Board of Directors in any capacity, he or she will abstain from the relevant meeting at which the decision on the complaint is taken.

The Company has an Occupational Physician who, in cases where an incident of violence or harassment at work is detected, may take note of it, if necessary.

## **PART II: 'POLICY ON THE PROTECTION OF PERSONAL DATA COLLECTED IN THE CONTEXT OF THE ABOLITION OF HARASSMENT'**

### **INTRODUCTION**

The company under the name "KALTEQ SA" (hereinafter "Company") respects the privacy of its employees and is in compliance with the General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR"). As part of the Employer's obligations to prevent and address violence and harassment in the world of work, as detailed and defined in Part II of Law 4808/2021, and in particular during the process of investigating a reported incident of violence and harassment in the workplace, the Employer will collect and access personal data of its employees/employees regardless of contractual/employment status. This document provides the details regarding the Processing of Data and sets out the appropriate measures to protect it. Failure to comply with this policy could have a significant negative impact on the Employer's business operations and could result in loss of reputation and financial loss. This policy is intended to inform employees/employees of the Company about the processing of their Personal Data (as defined below) in the context of an investigation of a reported incident of violence or harassment and to contribute to the Company's general compliance with all applicable laws on the protection of Personal Data, including Law 4624/2019 and the GDPR.

### **WHAT DATA WE COLLECT**

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In the context of the survey, the Employer collects and processes the following personal data of the data subjects:

First and last name.

Address.

Contact telephone/s.

E-mail.

Gender.

Data on the opinion and views of the data subject about other persons related to the Employer such as employees, managers (supervisors), members of the management team or former employees in these positions.

Data on the date and location of the data subject's actions or conversations.

Data subject's answers to the questions on the relevant form (Questionnaire) or in written or recorded minutes.

Data collected in the course of interviews for the investigation of incidents which may consist of paper documents, or electronic records submitted for examination by the parties involved.

Signature.

## **HOW WE COLLECT PERSONAL DATA**

### **A. Directly by the natural person**

The Employer collects personal data directly from the subject in the following ways:

- Upon submission of the complaint.
- By submitting records relating to the documentation or defense against the complaint.
- By conducting oral interviews during the investigation of the incident.

### **B. From third parties**

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In certain cases, personal data is collected by third parties such as:

- From the opposite side of the dispute.
- From associates/employees of the Company if they are called to testify as witnesses or if they report an incident that has come to their attention.
- From third party witnesses not employed by the Company, to the extent permitted or required by the investigation.

### **C. By right.**

Where required the Employer may collect data from:

From each employee's/worker's file.

From records of the Employer's use of its technological and communications equipment to the extent permitted by law.

### **LAWFUL BASIS OF PROCESSING**

Personal Data collected directly from the subjects or by third parties or automatically, are processed only in the context of the legitimate purposes of processing, as described in the applicable legal framework. The lawful purposes for processing Personal Data are:

(a) to comply with obligations under the law (Law 4808/2021 and No. M.A. 82063/1November 2021 (Government Gazette 5059/B/1-11-2021)).

(b) to safeguard and protect the legitimate interests of both the Company and the employees/associates themselves.

(c) the consent given by the data subject under the specific conditions set out in the legal framework, for example in the case of recording and creation of audiovisual material. In this case, subjects will be asked to give prior consent, either verbally or in writing, in both cases with prior clear information and a secure method of documenting valid consent. Failure to provide consent to record the employee's testimony will have no effect on the investigation or its outcome.

In particular with regard to the processing of Special Categories of Data, the processing is necessary for the performance of the obligations and the exercise of specific rights of the controller or the data subject in the field of labour law and social security and social protection law, where permitted by Union or Member State law.

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## **DISCLOSURE OF DATA**

The Personal Data collected in the context of a complaint and investigation of an incident of violence and harassment are used exclusively for the fulfilment of the obligation of internal investigation of the complaint at the workplace, in accordance with the provisions of Part I.

In the context of ensuring the best possible execution of the research and always in accordance with the applicable legislation on the protection of Personal Data, the recipients of the Personal Data of the research may be the following:

- The members of the Committee
- The Reference Person
- The Occupational Physician
- The opposite party

To the extent that cooperation is necessary, any competent public, administrative or judicial authority which, either on its own initiative or at the request of an aggrieved person, requests data or information within its competence.

The Company shall take all appropriate technical and organisational measures, in particular with regard to the flow of data to recipients or those involved in the investigation process who are bound by confidentiality and confidentiality clauses regarding access or have a legal obligation of confidentiality under the law.

## **RETENTION OF PERSONAL DATA**

Personal Data collected in the context of an investigation will be recorded in a special file and will be kept for as long as the internal investigation and evaluation of the data is ongoing and, to the extent necessary in the context of our cooperation with any competent public, administrative or judicial authority, which, either ex officio or upon request by an affected person, within the scope of its competence, requests the provision of data or information. In this case, the data will be kept at least until the conclusion of the judicial investigation or the adoption of a final court decision. In any other case, the data will be destroyed upon the expiry of one (1) year from the completion of the investigation and the adoption of the relevant conclusion.

After the relevant period of time, the data is deleted or destroyed by secure methods in accordance with the Employer's Storage and Destruction Policy.

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Data for statistical purposes may be kept for an indefinite period of time if they have been anonymised.

## **INTERNATIONAL TRANSFERS**

The Company will not transfer Personal Data collected from data subjects to other countries. However, if the need to transfer to third countries arises, the Company will take appropriate measures to protect Personal Data in accordance with the GDPR, such as sending to countries that have obtained an adequacy decision or using Standard Contractual Clauses and any other safeguards to ensure the legality of the transfer.

## **THE RIGHTS OF DATA SUBJECTS**

In accordance with the applicable legislation and in the context of the Research, the data subject, after proving his/her identity and submitting his/her written request, has and may exercise the following rights:

The right of access, i.e. the right to be informed as to whether personal data are being processed and to obtain further information on the processing carried out, insofar as it does not conflict with any rights of other natural persons involved in the investigation who have a legitimate right to confidentiality/secretcy protection.

The right to request the correction of any inaccurate Personal Data or their completion. The following distinction should be made at this point:

Data relating to facts and data that can be objectively verified (such as the date and time of an event, the place of work of one of the participants) are subject to this right.

Facts arising from the parties' allegations and under investigation cannot be changed by the exercise of this right.

The right to object to further processing of their data,

The right to withdraw any consent given, for the future, without affecting the lawfulness of any processing already carried out. If the conditions provided by law are met:

The right to erasure,

The right to restrict processing and

The right to data portability.

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The data subject may exercise his/her rights by sending a message to: [mail compliance@Kalteq.gr](mailto:compliance@Kalteq.gr) The Company shall take all possible measures to satisfy the request within a reasonable period of time, at the latest within one (1) month after the submission of the request and the identification of the data subject. This period may be extended by a further two months if necessary, taking into account the complexity and number of requests.

In addition, if the data subject considers that his/her rights are violated, he/she has the right of recourse to the Personal Data Protection Authority regarding the way the Company processes Personal Data ([www.dpa.gr](http://www.dpa.gr)) at the link [https://www.dpa.gr/el/polites/katagelia\\_stin\\_arxi](https://www.dpa.gr/el/polites/katagelia_stin_arxi), Offices: 1-3 Kifissias Street, P.C. 115 23, Athens, Athens, Phone: +30-2106475600, Fax: +30-2106475628.

### **CHANGES IN POLICY**

This Policy may be amended in order to adapt and comply with the legal framework in force at any time. In the event of any change, employees will be informed by the Employer in the most appropriate manner.