

# MIRUM



## POLICY

**1. ON PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT  
WORK**

**&**

**2. ON ADDRESSING AND HANDLING INTERNAL COMPLAINTS ABOUT  
INCIDENTS OF VIOLENCE AND HARASSMENT AT WORK OF THE  
COMPANY UNDER THE NAME:**

**«MIRUM HELLAS SOCIÉTÉ ANONYME»**

**July 2024**

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## INTRODUCTION

The company MIRUM HELLAS, belonging to the MIRUM Group of Companies, is active in the construction industry, with strategic investments in the area of ELOUNDA HILLS in Agios Nikolaos, Crete and, precisely because of its mission and its key role in the region, is committed to disseminate ethical principles in every work environment, as well as to apply appropriate tools to prevent any form of violent and ethically undesired behavior in the context of its labor relations.

MIRUM HELLAS believes that ethical behavior is a prerequisite for preserving the trust of our employees, shareholders and business partners, stakeholders and the communities in which we operate. MIRUM incorporates the parameters of ethics and good reputation in its business decisions and in all its business activities, considering that this is one of the key elements for both effective management and sustainable development of the company.

Relations with employees, partners and any person acting on behalf of MIRUM, within their scope of responsibility and assigned tasks, are based on mutual trust, respect, understanding, honesty and open communication. The Company's recruitment and employment practices comply with applicable law and have been designed with respect to fundamental principles and rights at work. In this context, MIRUM HELLAS is committed to the implementation of all national and international regulations aimed at protecting human rights at work, emphasizing the principle of equal opportunities for employees regarding recruitment, remuneration and professional advancement, regardless of age, ethnic origin, nationality, religion, gender, disability, sexual orientation, political position, economic level or other capacity and committed to shaping a respectful and non-discriminatory working environment where different ideas, opinions and beliefs are protected.

The corporate social policy of MIRUM HELLAS is based on human rights. These set minimum labour standards and complement our corporate values. We are committed to protecting and promoting human rights as set out in the United Nations Universal Declaration of Human Rights (UNDHR) and the International Labour

Organization (ILO) Declaration of Fundamental Principles and Rights at Work, as the value of human life is at the core of what we do.

It is therefore expected that MIRUM HELLAS' employees and partners, third parties and Private Counterparties will comply in the performance of their duties/obligations in any type of transactions or relationships with MIRUM HELLAS or in the course of their business activities with MIRUM HELLAS, in accordance with the present Policy for preventing and combating violence and harassment in the workplace, and with all the laws governing their activity.

This Policy is approved by the Board of Directors.

## **1. Introduction**

With this Policy, our company incorporates articles 9 and 10 of Law 4808/2021, which ratified the International Labour Convention 190/21.06.2021 of the International Labour Organization (ILO), on the elimination of violence and harassment at work, the text of which it annexed as such to the text of the law.

The Company, showing zero tolerance to incidents of violence and harassment in the workplace, adopts the said policy, which aims to enhance integrity and respect for all, as these constitute an integral part of our corporate environment.

## **2. Purpose**

The aim of this policy is to create and consolidate a working environment that respects, promotes and safeguards human dignity, the unique personality of each person and the right of every person to a world of work free from violence and harassment.

The Company "MIRUM HELLAS S.A." declares that it recognizes, promotes and respects the right of every employee to a working environment free from violence and harassment and that it does not tolerate any such behavior, of any form, by any person. In addition, it declares zero tolerance to these forms of behavior, of any form and by any person, and specifies the rights and obligations of employees and the employer to prevent and address such incidents or forms of behaviour.

### **3. Definitions**

#### **A. Company**

means the company "MIRUM HELLAS S.A."

#### **B. Employees**

It means all kinds of Personnel ("employees (male)" or "employees (female)" for the purposes of this policy) associated with the Company:

- with an employment contract (of indefinite or fixed term, of full-time or part-time),
- by works contract,
- Personnel seconded from an EU Member State or Personnel from third countries,
- members of the Board of Directors and managers/executives
- by contract of independent services,
- by remunerated mandate,
- with an apprenticeship contract,
- by loan (work substitution) agreement,
- employed through third-party service providers;
- Volunteers
- jobseekers,
- persons whose employment relationship with the company has ended.

#### **C. Violence and harassment**

It means the forms of conduct, actions, practices or threats thereof, which aim, lead or are likely to lead to physical, psychological, sexual or economic harm, whether occurring individually or repeatedly.

#### **D. Harassment**

Such a conduct is defined as the conduct which has the purpose or effect of violating the dignity of the person and of creating an intimidating, hostile, humiliating, degrading, or offensive environment, whether it constitutes a form of discrimination, and includes harassment based on sex or on other grounds of discrimination.

### **E. Gender-based harassment**

This means conduct related to the sex of a person which has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, humiliating, degrading, or offensive environment. These forms of behavior include sexual harassment of Law 3896/2010, as well as forms of behavior related to sexual orientation, expression, gender identity or sex characteristics of the person.

### **F. Sexual harassment**

Any form of unwanted verbal, psychological or physical conduct of a sexual nature, which has the effect of offending the personality of a person, by creating an intimidating, hostile, degrading, humiliating or offensive environment around him/her. Provisions providing for sanctions for such conduct shall apply as in force.

### **G. Workplace**

It means a broader spatial context, in which incidents of violence and harassment can take place, namely:

- In the workplace, including public and private places and places where the employee provides work, receives remuneration, takes a break or rests, in personal hygiene and care areas, changing rooms or accommodation provided by the company.
- While traveling to and from work, other travel, business trips, education, as well as work-related events and social activities.
- During work-related communications, including those made through information and communication technologies (corporate e-mails and mobile phones).

### **H. Domestic violence**

This means all acts of physical, sexual, psychological or economic violence that place within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners, and regardless of whether the offender shares or previously shared the same home with the victim, in accordance with applicable law.

Incidents of domestic violence that take place in the workplace, for example through physical violence, sexual harassment and stalking by current or former partners, constitute a serious form of workplace violence under applicable law.

Domestic violence, in any form, inflicted on the employee during telework is also a serious form of violence in the workplace, according to applicable law.

#### **4. Forms of harassment**

##### **What constitutes a violent incident and harassment?**

Such behaviors that may occur are indicatively the following:

- Threatened or actual physical violence
- Intimidation, oppression, persecution
- Aggressive or threatening behavior that reasonably causes fear to another person
- Verbal hostility and abusive comments
- Visual forms of harassment e.g. posters or derogatory designs based on legally protected features
- Overt/undisguised threats
- Threats related to employment and conditions
- Offensive comments or jokes about another person
- Haughty, derogatory and diminishing comments
- Acts of retaliation
- Domestic violence transmitted in the workplace
- Sexual comments, jokes, gestures of a sexual nature
- Immoral and/or offensive comments about gender or sexual orientation
- Prying/indiscrete questions about personal or sexual life
- Sexual innuendo
- Invitations to date or sexual intercourse
- Unwanted touches, whistles, caresses, kisses
- Send messages of erotic or sexual content (by phone or e-mail).

##### **What does **NOT** constitute an incident of violence and harassment**

- Direct supervision of employees, including setting performance expectations.
- Taking steps to correct performance, such as placing an employee on a performance improvement plan.
  - Assigning tasks and guiding them on how and when they should be done.
  - Request updates or task progress reports.
  - The approval or refusal of leave.
  - Request for documentation of absence for health reasons based on current provisions.
    - The moral and/or financial reward of excellent employee performance.
    - Providing feedback on work performance.
    - Recommendations for compliance with regulations reflected in provisions of the Law, directives, procedures and internal circulars of the company.

## **5. Obligations of the company – Measures to prevent incidents of violence and harassment**

The Company declares its zero tolerance to any incident of violence and harassment, in any form it may take, including sexual harassment and gender-based violence, which takes place at work or in connection with it, by an employee against another employee, by a supervisor, by an authorized person, understood as employer, by a customer, by a visitor, and any third party.

The Company takes all appropriate and necessary measures to prevent and address such incidents and forms of behavior.

More specifically, the Company:

- Adopts the present Policy for preventing, addressing and combating violence and harassment at work, which declares zero tolerance for incidents of violence of any form, discrimination and harassment, praises respect for human rights and dignity of all employees and provides for a process of open and honest dialogue between employees and managers, as well as submission of complaints and denunciations to the Reference Person, as defined below, to the email address: [tellus@mirum.gr](mailto:tellus@mirum.gr), in any case. As the "**Reference Person**", who guides and informs employees to prevent



and deal with incidents of violence and harassment at work, is defined as the HR Manager of the company (Human Resources Manager).

- He/she promotes a process of open and honest dialogue between employees and managers.

- He/she provides access to employees, by any appropriate means, to this Policy, which is posted in areas accessible to all Personnel, so that all employees are aware of their rights.

- He/she informs about the rights and obligations of employees and the employer, as well as of persons exercising the managerial right or representing the Company, to the extent and to the grade of their own responsibility, in case of reporting or denouncing incidents of violence or harassment.

- He/she collaborates with the competent Occupational Doctor in order to update an Occupational Risk Assessment Study, in order to include psychosocial risks, including the risks of violence and harassment at work, and to prevent incidents of violence and harassment in the workplace, such as in places where employees rest, dine, etc.

- He/she supervises the implementation of this policy and takes action for employees who do not comply.

- He/she ensures a safe and fair working environment.

- He/she imposes the necessary and appropriate sanctions/disciplinary penalties in case of detection of a prohibited form of behavior by any employee, or supervisor, or other necessary and proportionate measures when such behavior comes from a third party, guest customer, or service provider which can extend as far as the termination of the legal relationship or cooperation.

## **6. Rights and Obligations of Employees**

### **Every employee is entitled to:**

- be treated with respect and courtesy.
- not to be subjected to violent behaviour, harassment, including sexual and gender-based violence, adverse discrimination and intimidation.

- immediately report any incident of prohibited behavior in the workplace (in accordance with this policy, as detailed below), without being victimized or suffering any other adverse consequence or retaliation.

**Every employee is obliged to:**

- to comply with this Policy and all applicable and in force procedures for the purpose of both, personal protection and that of other employees of the Company.

- may immediately notify any incident of violence and harassment to his/her supervisor, unless that person is involved in any way in the incident, or to the persons reporting this Policy, at his/her choice. That is, the employee, who experiences an incident of violence or harassment, may contact his/her supervisor in order to receive guidance from him/her on the actions to be followed to deal with an incident of violence or harassment by referring him/her to the "reference persons", while he/she may address directly to the "Reference Persons", especially if the person causing the incident of violence or harassment is the employee's supervisor, who receives violent or harassing behavior.

- In case the person causing the incident of violence or harassing behavior is one of the two "Reference persons", as defined below, the employee will address the Board of Directors of the company or directly to the Labour Inspectorate.

- To cooperate in the investigation of any complaint submitted in accordance with the procedure set out below.

- To participate in actions and training programs of the Company regarding incidents of violence and harassment.

**7. Guidelines for preventing and responding to violence and harassment**

In order to prevent and deal with incidents of violence and harassment in the workplace, it is advisable for employees to:

- Seek comprehensive and objective information on violence and harassment legislation and protection mechanisms. The Company may provide assistance and information on such matters.

- Participate in actions and programs aimed at combating stereotypes, prejudices and adverse discrimination.

- Correct their behavior when they realize that it annoys or insults a colleague or coworker.
- They define their individual boundaries to those around them.
- Do not ignore incidents of violence and harassment.
- Do not feel uncomfortable, ashamed or blame themselves for the behavior of the offender.
- Do not excuse the behavior of the offender.
- Reject or calmly and decisively repel violent or harassing behavior.
- They immediately inform their supervisor through an informal, open and honest dialogue.
- Submit a written complaint, via email, for further support to the e-mail box: [tellus@mirum.gr](mailto:tellus@mirum.gr).

#### **8. Procedure for the Submission and Handling of Internal Complaints of Incidents of Violence and Harassment – "Reference Persons"**

As part of its legal obligation, the Company adopts a Complaints Submission and Management Procedure in order to ensure the protection of employees and respect for human dignity.

The Company is committed both, through the employees' supervisors and through the "Reference Persons", to receive and not to obstruct the receipt, investigation and management of complaints about incidents of violence and harassment. Specifically:

**A)** For this Policy:

- As the "**Reference Person**", responsible for guiding and informing employees on the prevention and handling of violence and harassment at work, as provided for in point 5 above, is defined the HR Manager of the company (Human Resources Manager). The HR Manager organizes targeted meetings to discuss issues of violence and harassment and to address potential risks in a timely manner, conducts awareness programs and training seminars on the recognition and management of risks of violence and harassment at work, informs employees about their rights and obligations and informs them about the possibility of submitting a written complaint about incidents of violence and harassment.

- The "**Reference Person**", who is designated as competent to receive, investigate and manage reports and complaints related to incidents of violence and/or harassment, is defined as the Company's **HR Director**.

**B)** The complaint can be submitted in person or via e-mail and specifically to [tellus@mirum.gr](mailto:tellus@mirum.gr). The complaint can be made either anonymously or by surnamed. It should be clarified, however, that anonymous reporting may hinder an adequate, timely and complete examination of the complaint.

**C)** The report should include the details of the person concerned, i.e. the person who committed a form of prohibited behavior, as well as the specific incident(s) that substantiate it.

**D)** The above competent "Reference Person", i.e. the HR Director, thoroughly investigates each complaint and collects any information necessary regarding it. Complaints and investigations shall remain strictly confidential to the maximum extent possible, considering the sensitivity of the case and the confidentiality of all parties involved.

**E)**, he/she may speak with the reporting person and the person concerned, hear witnesses, request the production of documents that may exist and prove that any incident of violence and harassment took place or not, and communicate with the heads of each department, if the complainant addressed them. In any case, it is at the discretion of the "Reference Person" to define the required degree of confidentiality required to complete the investigation.

**F)** When the "Reference Person", i.e. the HR Director, completes the investigation, he/she submits a written report to the Board of Directors of the Company, stating its result. The results of the investigation shall be communicated simultaneously to both the denouncing and the accused person, for them to become aware of these.

**G)** The completion of the investigation and the submission and communication of the "Reference Person" conclusion must take place as soon as possible and, in any case, no later than four (4) weeks from the date of submission of the complaint by the complainant.

**H)** In the event that an incident of violence and harassment is indeed established, the Company's Management proceeds, on a case-by-case basis, to take

all necessary, appropriate and proportionate measures against the complainant. Such measures may include, but are not limited to:

- (a) recommending compliance orally or in writing;
- (b) changing the job, working hours, place and manner of providing work;
- (c) the imposition of a disciplinary penalty in accordance with the provisions of the Internal Labour Regulation,
- (d) the termination of the employment or cooperation contract with the company.

I) If the incident of violence and/or harassment comes from the Human Resources Manager himself, the victim appeals directly, at his/her choice, either to the Board of Directors of the company or directly to the Labor Inspectorate.

J) The investigation and examination of complaints will be carried out with impartiality and protection of confidentiality and personal data (PD) of complainants and accused, which are collected in the exercise of the above duties. It is understood that due to his/her position and role, the HR Director will have access to company files, audiovisual material collected by him/her and other appropriate means to collect information and data during the examination of the complaint and to identify the concerned persons.

### **9. Rights of affected persons**

According to the current legislation, any person who suffers an incident of violence and harassment against him/her during access to employment, during the employment relationship or even if the contract or employment relationship under which the incident or behavior allegedly occurred has expired, has at the same time the right to: a) judicial protection, b) appeal, submission of a complaint and application for a labour dispute to the Labour Inspectorate, within the framework of its statutory competences, c) reporting to the Ombudsman, within the framework of its statutory competences, as well as d) complaint within the company in accordance with the complaints management policy.

In any event, where such conduct is reported or denounced within the undertaking, the affected person shall retain all rights to appeal to any competent Authority.

Furthermore, any person who suffers violence and harassment against him/her has the right to leave the workplace for a reasonable time, without deprivation of salary or other adverse consequence, if in his/her reasonable belief there is an imminent serious danger to his life, health or safety, in particular, when a superior or a person acting as employer is the perpetrator of such conduct or when appropriate measures are not taken; to restore industrial peace, or when such measures are not sufficient to stop the conduct of violence and harassment.

In this case, the withdrawing party is obliged to inform the "Reference Persons" in writing, stating the incident of violence and harassment and the incidents justifying his/her belief that a serious danger to his/her life, health or safety is imminent. In addition, employees who face incidents of violence and harassment at work have the right to appeal to the competent authorities, as defined by law.

#### **10. Obligation of impartiality and confidentiality**

The "Reference Person", who is responsible for investigating and handling complaints, i.e. the **HR Director**, is obliged to act in the process of investigating complaints, in an objective and impartial manner. In addition, he/she must behave with respect to all parties involved and in a confidential and case-discrete manner. It is strictly and expressly forbidden to make public or disclose to non-involved parties any information concerning the case denunciation.

In any case, the company undertakes to maintain confidentiality during the investigation to the maximum extent possible under the circumstances and remains fully responsible for implementing all necessary measures to protect the personal data of the persons involved.

#### **11. Prohibition of Retaliation - Victimization of the complainant**

It is forbidden to exercise retaliation and victimize an affected person due to intolerance to sexual or other harassment against him, or due to protest, complaint or testimony of an employee or his representative, before a Court, competent Authority or the Company, regarding an incident of violence and harassment. The exercise of retaliation and victimization as described above constitute a serious violation of this policy and have consequences for the person acting in this way, in

accordance with the principles and procedures of the company, while it may also result in the termination of the employment contract or in other cases other similar measures up to the termination of the legal relationship with a third party.

#### **12. Cooperation with administrative and judicial Authorities**

In case the affected person has reported the incident of violence and harassment before any administrative or judicial Authority, the company undertakes to provide any necessary help and assistance, as well as any information it may have to these competent Authorities.

#### **13. Cases of Domestic Violence**

The Company takes, to the extent possible, measures to protect employment and support employees victims of domestic violence.

Any employee who has suffered domestic violence, which also extends to the workplace, may report this fact orally or in writing to his/her supervisor or to the respective HR Director, to inform the company and take appropriate and necessary measures.

#### **14. Malicious Complaints**

Complaints, which prove to be manifestly malicious, will be further investigated at the discretion of the HR Director, both as to the motives and as to those involved, in order to restore labor peace in any legal way and means.

#### **15. Policy Review**

This Policy is amended according to its legislative and regulatory framework. In any case, legislative provisions prevail over this policy.

The revision hereof is examined and approved by the Board of Directors of the Company.

Employees who need more information or have questions about this policy can contact their Supervisor or the "Reference Persons".

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## ANNEX

### External information sources nationwide:

#### Contact details of competent authorities

##### ✓ APCR complaints hotline

- Call the citizen service line **1555** (operating 24/7)
- Call the competent department of the Regional Directorate of Labour Relations Inspection **of Crete**, namely the Department of Labour Relations Inspection of Lasithi, at 12A Epimenidou Street, Agios Nikolaos, Crete, telephones: **28410 22885, 28410 83245** Or the competent department of the Regional Directorate of Labour Relations Inspection **of Athens**, i.e. the Department of Labour Relations Inspection of the Eastern Sector of Athens, at Patission Street no. 37, contact numbers: **210 52812-12, -13, -14, -20, -23, -25**

##### ✓ Ombudsman: <https://www.synigoros.gr/el/anafora/ipovoli-anaforas>.

✓ Direct psychological support and counseling service for women victims of gender-based violence to be able to contact the "SOS Hotline" 15900.

##### ✓ Hellenic Police

- Call **100** (operates 24/7)

#### Domestic violence

- Call **100** (operates 24/7).
- If you can't talk, send an SMS to 100.
- For more information, please visit the following Hellenic Police website on domestic violence:

[http://www.astynomia.gr/index.php?option=ozo\\_content&perform=view&id=2030&Itemid=421&lang](http://www.astynomia.gr/index.php?option=ozo_content&perform=view&id=2030&Itemid=421&lang)

- Call 15900 (operating 24/7)

#### General Secretariat for Demographic and Family Policy and Gender Equality (G.G.I.F.):

- Call **15900** (operating 24/7)
- If you can't talk, e-mail : [sos15900@isotita.gr](mailto:sos15900@isotita.gr)

#### Useful Websites

- <https://isotita.gr>
- <http://womensos.gr>