

General Manager of
Legal Affairs & Corporate
Governance

Compliance Department



POLICY AGAINST VIOLENCE AND HARASSMENT AT WORK

BoD Decision 25/27.07.2023

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One power
system for all

1 PURPOSE

With this policy, HEDNO SA (in accordance with Part II of Law No. 4808/2021) aims to prevent and combat all forms of violence and harassment (including gender-based violence and harassment) occurring in the course of, or in connection with, or arising from work.

2 SCOPE OF APPLICATION

The policy applies to all employees of the Company (irrespective of their contractual relationship) and in particular to members of the management, employees with a contract of employment (fixed-term and open-ended), service providers with remunerated or non-remunerated mandate, project contract, independent services and temporary employment contracts, trainees, apprentices and volunteers, as well as those employed through third party service providers. It also covers former employees, whose employment relationship has ended, as well as those who apply for work.

The policy is implemented:

(a) in workplaces, including public and private places and places where the employee performs its duties, is remunerated, takes a break, in particular, for rest or eating, in personal hygiene and care areas, changing rooms or accommodation provided by the Company,

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

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

3 DEFINITIONS

"Violence and Harassment" mean those forms of conduct, acts, practices or threats thereof, which are intended to cause, result in or are likely to result in physical, psychological, sexual or economic harm, whether occurring as an isolated conduct, act, practice or threat or repeatedly. The above concept includes, by way of example, forms of conduct which have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile or aggressive environment, regardless of whether they constitute a form of discrimination.

"Harassment" means any form of conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment on the grounds of sex or on other grounds of discrimination.

"Gender-based harassment" means forms of conduct related to a person's gender that have the purpose or effect of violating the person's dignity and creating an intimidating, hostile, degrading, humiliating and/or aggressive environment. The above forms of conduct include sexual harassment, as defined by the provisions of Law under No. 3896/2010, as well as forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics.

"Offensive behaviour" related to incidents of violence and harassment means dangerous, unethical or illegal practices that take place in the workplace or in the context of the Company's activities and which include, but are not limited to, moral harassment (mobbing), bullying, threats, extortion/blackmail, insults - verbal abuse, defamation, discrimination based on a person's gender, sexual orientation, colour, age, ethnicity, religious and/or political beliefs, marital status. Indicative examples of harassment/violence are listed in Annex 1.

4 ZERO TOLERANCE STATEMENT ON VIOLENCE AND HARASSMENT AT WORK WHEREVER IT DERIVES

HEDNO S.A. rejects and opposes explicitly and unequivocally, any form of violence and harassment that occurs during work, whether related to it or resulting from it.

In particular, the Company is committed to:

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

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

5 MEASURES TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT

In order to ensure an accessible, safe and friendly working environment, the Company is committed to instruct, train and sensitise its personnel/staff regarding incidents of violence and harassment at work, by adopting the following measures and mechanisms for prevention and handling:

- Information by all appropriate means and training of all managers and employees (employees in general)
- Encourage employees and any third party connected in any way with the Company to report/make complaints about incidents of violence and harassment in the workplace that they happen to witness,
- Identify sectors and specialties where workers are most exposed to incidents of violence and harassment,
- Establish an internal mechanism to disclose/report and investigate incidents of violence and harassment.
- Designate a reference person (liaison), responsible for guiding and informing employees on how to prevent and deal with incidents of violence and harassment.

For this purpose, the competent Department of the company is the Compliance Department.

Reports/complaints of incidents of violence and harassment will be accepted in accordance with the Company's Sanctions Policy & Reporting/Complaints Handling Process and will be investigated promptly and thoroughly. Upon reporting an incident or complaint by a Company employee and in order to ensure a healthy working environment, the Company may take the necessary and appropriate measures to ensure that no similar incident or behaviour is repeated in the future.

These measures may include, but are not limited to, a recommendation to comply, a change of job duties, working hours, place or manner of work, disciplinary sanctions, termination of the employment contract of the employee who engaged in violent or harassing behaviour or of the cooperation agreement, as well as legal - judicial action.

Any employee or worker who suffers an incident of violence and harassment against them has the right to leave the workplace for a reasonable period of time, without loss of pay or other adverse consequence, if in their reasonable belief there is an imminent serious risk to their life, health or safety, especially when the Supervisor is the perpetrator of such behaviour or when the necessary appropriate measures capable of stopping the behaviour of violence and harassment are not taken. In such a case, the staff member concerned shall inform their Unit in writing beforehand, giving reasons for their belief that there is an imminent serious risk to their life, health or safety. If the risk does not exist or has ceased to exist and the employee refuses to return to the workplace, the employer can appeal to the Hellenic Labour Inspectorate (SEPE) in order to resolve the the dispute.

In any case, the affected persons have the right, in addition to judicial protection, to appeal directly to the Hellenic Labour Inspectorate (SEPE) and the Greek Ombudsman, as the bodies in charge of resolving disputes due to violence and harassment at work.

6 CONFIDENTIALITY AND PRIVACY

In the process of handling complaints and disclosures of incidents of violence and harassment, the conditions of confidentiality and secrecy of both the complainant and the accused will be strictly observed. Furthermore, absolute secrecy will be maintained with

regard to the content of the report/complaint, as well as any information that could lead to the identification of the person disclosed or directly complained about.

The manner, in which the protection of information and access of the person responsible for the investigation of each reported incident of workplace violence and harassment will be ensured, is detailed in the Company's Sanctions Policy & Reporting/Complaints Handling Process.

7 FINAL PROVISIONS

The Head of the Compliance Department, under this Policy, hold the position of Compliance Officer, noting that this Compliance Officer, who constitutes a separate and distinct person from the Compliance Officer of the Compliance Programme under Article 124 par. 7 and subsequent articles of Law 4001/2011, is in cooperation where necessary with the Human Resources Department and will act as the competent internal body of the Policy, with powers that will include:

- a)** monitoring the implementation of this policy,
- b)** evaluating its effectiveness,
- c)** submitting proposals on measures it considers necessary to improve and strengthen the protection of victims of violence and harassment in the workplace.
- d)** recommending amendments to this policy, inter alia, to adapt it to any more recent relevant legislation in force.

This Policy against Violence and Harassment at work is effective upon approval by the Company's Board of Directors. The full text is permanently available in an accessible and prominent place in the Company's premises, while it is also posted on the Company's website.

ANNEX 1

Indicative examples of harassment and violence:

- Circulation of offensive or obscene material (printed or electronic).
- Mocking, obscene or sexually or racially offensive comments directed at minority groups.
- Using offensive language, describing or making fun of someone with a disability.
- Comments about someone's appearance or character that cause embarrassment or shame.
- Sending unsolicited messages with sexual or threatening or offensive content via SMS, e-mail, social media, fax, letter, telephone.
- Offensive and unjustified questions about someone's marital status, personal life, health, sexual interests or preferences, as well as similar questions about someone's race or ethnicity, including their cultural identity and religion.
- Unwelcome, sexual gestures or persistent requests for private, non-work-related meetings.
- Solicitation of a sexual relationship with the threat (direct/indirect) that refusal will affect career development or recruitment.
- Indecent gestures, touching and any kind of unwanted physical contact.
- Spreading malicious comments or insulting someone (especially because of discrimination on the grounds of age, race, health, gender reassignment, type of marriage, civil partnership, pregnancy and maternity, sex, any type of disability, sexual preference, religion or belief).
- Verbal threats or threatening gestures, such as shouting or swearing - in public or in private - to staff or colleagues, intimidation of employees.

- Belittling or ridiculing a person or their abilities, either in private or in the presence of others.
- Anger outbursts against a person or a group for trivial/insignificant reasons.
- The systematic and abusive exercise of management rights directed against a specific person or persons for incidents falling within the scope of this policy.