

AUXILIARY FUND FOR THE INSURANCE OF LIABILITY ARISING FROM MOTOR ACCIDENTS – LEGAL ENTITY GOVERNED BY PRIVATE LAW (P.D. 237/86

1 MAKRI St., ATHENS, 11742

This Policy applies to the **AUXILIARY FUND FOR THE INSURANCE OF LIABILITY ARISING FROM MOTOR ACCIDENTS – Legal Entity Governed by Private Law (P.D. 237/86)** having its registered seat at 1 Makri Street, Athens, with the object of the Payment of Insurance Compensation for Civil Liability arising from motor accidents, as more specifically provided for in Article 19 of Law No. 489/1976, hereinafter referred to as the “Company”.

In accordance with the established will and commitment of the Company’s management to ensure compliance with the applicable legislation, the Auxiliary Fund complies with all measures and obligations relating to the implementation of the provisions of Part II of Law No. 4808/2021 for the prevention and addressing of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

The purpose of this policy is to create and establish a working environment which respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment. The Company, as a Legal Entity Governed by Private Law, declares that it recognises and respects the right of employees to a working environment free from violence and harassment and that it does not tolerate any such behaviour, of any form and from any person.

This policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulatory legislation implementing them, and covers the persons referred to in par. 1 of article 3 of Law No. 4808/2021.

## **PART A. Prevention and combating of violence and harassment at work**

### **1. Assessing the risks of violence and harassment at work**

#### ***(a) Identification of potential sources of risk***

**1-1.** The present policy is based on the identification of sources of risk associated with the nature of the Company’s activity and the particular characteristics of the jobs and the hierarchical structure included in said activity.

**1-2.** In particular, the following are taken into account as risk factors:

- The fact that the activities of the Company, which operates in the payment of insurance compensation for civil liability arising from motor accidents, as more specifically provided for in Article 19 of Law No. 489/1976, consist mainly of office work performed during specific working hours, as a rule with the physical presence of employees, but also that the nature of the work may exceptionally include the performance of tasks during hours of reduced staff presence and/or remote work.
- The fact that the Company provides opportunities for employment and advancement to adults who have the relevant required qualifications, irrespective of age group, origin, gender or other individual characteristics.
- Various factors associated with the nature of the work, such as, for example, the existence of high stress and pressure arising from the highly demanding professional obligations undertaken by the Company, both in terms of quality and in terms of compliance with schedules and deadlines.
- The layout of the Company's workplaces and, in general, the forms of communication between employees, to the extent that these may allow to a greater or lesser degree the prevention of behaviours prohibited by the present policy.
- The fact that the individual training and awareness of employees with regard to issues of respect for human dignity, as well as the individual background of each of them (e.g. history of violent behaviour, etc.), cannot always be known in advance.

**1-3.** Within this context, it is understood that the risks of behaviours of violence and/or harassment may occur:

- (a) in any area of the Company, including areas where employees perform their work, receive remuneration, take breaks, in particular for rest or for meals, and in areas of personal hygiene and care
- (b) during all types of travel for business trips, training, as well as during events and social activities related to work or connected with the Company's activities
- (c) during work-related communications and Company activities, including those held through information and communication technologies.

**1-4.** The objective of the Company is to identify and update risks on an on an ongoing basis, taking into account, among other things, digital tools for the assessment of occupational risk, where and when these are available.

***(b) Definition of behaviours of violence or harassment***

**1-5.** “Violence and harassment” means the behaviours, actions, practices or threats thereof, whether in a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm.

**1-6.** “Harassment” means any behaviour which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not constituting a form of discrimination, and includes gender-based harassment or harassment based on other grounds of discrimination.

**1-7.** “Gender-based harassment” means the forms of conduct related to a person’s gender, which have the purpose or effect of violating the dignity of that person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of conduct include sexual harassment, within the meaning of Law No. 3896/2010, as well as forms of conduct related to the person’s sexual orientation, expression, gender identity or characteristics.

**1-8.** Indicative instances of violence and harassment incidents include the following forms of behaviour:

- Threatened or actual physical violence
- Intimidation, oppression, persecution
- Aggressive or threatening behaviour which reasonably causes fear to another person
- Verbal hostility
- Overt threats
- Threats related to position and working conditions
- Offensive comments or jokes concerning another person
- Arrogant, derogatory and demeaning comments
- Acts of retaliation
- Domestic violence carried over into the workplace
- Sexual comments, jokes, gestures
- Immoral and/or offensive comments regarding gender or sexual orientation
- Intrusive questions regarding personal or sexual life
- Sexual insinuations
- Invitations for dates or sexual contact
- Unwanted touching, whistling, caressing, kissing
- Persistent or lascivious staring
- Sending messages of an erotic or sexual nature (via telephone or by e-mail)

**1-9.** The following do not constitute violence and harassment incidents

- Direct supervision of employees, including the setting of performance expectations

- Taking measures to correct performance, such as placing an employee on a performance improvement plan
- The assignment of tasks and guidance as to how and when they should be carried out
- Requests for work updates or progress reports
- The approval or refusal of leave
- Requests for documentation of absence for health reasons in accordance with the applicable provisions
- The moral and/or financial rewarding of an employee's excellent performance
- The provision of constructive feedback regarding work performance

## **2. Measures to prevent, control, mitigate and address such risks, and to monitor such incidents or patterns of behaviour**

**2-1.** It is strictly prohibited for all employees and members of management working in the Company to engage in any form of violence and harassment occurring during the course of work, whether connected with it or arising from it, including violence and harassment on the grounds of gender, religion, race, sexual orientation, as well as sexual harassment.

**2-2.** In addition to the above express prohibition, the Company's Management promotes the following measures and administrative practices for the prevention and control of the risks of violence and harassment:

- Encouragement to maintain a working environment where respect for human dignity, cooperation and mutual assistance are core values.
- Open communication with the employer and with immediate supervisors and colleagues.
- Procedure for the management of reports/complaints.
- Ensuring that employees have the necessary training/information to perform their duties, particularly in jobs presenting a higher risk of occurrence of violence and harassment incidents.
- Technical measures, such as improvement of lighting, etc.
- Actions for raising employees' awareness regarding healthy standards of behaviour (e.g. avoidance of addictions), as well as on issues concerning vulnerable categories of employees.
- Guidance and support to victims of violence and harassment or to victims of domestic violence for their reintegration into the workplace.
- Training of employees on procedures for the management of incidents of violence.
- Regular evaluation of the effectiveness of the implemented preventive measures and remedies, and review/update of the assessment of the risks and measures.

### **3. Information and awareness-raising actions for the staff**

**3-1.** The Management of the Company declares its zero tolerance towards violence and harassment phenomena and undertakes to provide staff with information and guidance in accessible forms, as appropriate, regarding the risks of violence and harassment, as well as the related prevention and protection measures, the procedures in place at the level of the undertaking, and the possibilities provided by law in the event of such incidents.

**3-2.** Within the framework of raising staff awareness, the competent bodies of the Company may, among other things:

- Organise targeted staff meetings to discuss relevant issues and timely address potential risks.
- Conduct seminars with mental health specialists or providers of counselling services, representatives of voluntary organisations, etc.
- Encourage the participation of employees' representatives and management executives in training programmes and educational seminars relating to the identification and management of violence and harassment risks at work.

### **4. Information on the rights and obligations of employees and of persons exercising managerial duties or representing the Company, in the event of occurrence or reporting or lodging of a complaint of such incidents, as well as on the relevant procedure**

**4-1.** In the event that any member of the staff is affected by an incident of violence and harassment during their access to employment, during the employment relationship, or even if the contract or employment relationship in the context of which the incident or behaviour is alleged to have occurred has terminated, they shall have the following rights:

- a) the right to judicial protection,
- b) the right to have recourse, to submit a complaint and to request the initiation of a labour dispute before the Labour Inspectorate, within the framework of its statutory competences,
- c) the right to report to the Ombudsman, within the framework of its statutory competences, as well as
- d) the right to submit a complaint within the undertaking in accordance with the complaints management policy.

**4-2.** In any case, where a report or complaint of such behaviour arises within the undertaking, the affected person shall retain all their rights to have recourse to any competent authority.

**4-3.** The contact details of the competent administrative authorities to which any affected person has the right to have recourse are as follows:

a) Labour Inspectorate (SEPE): The contact details are available on the website of said authority (<https://www.hli.gov.gr/epikoinonia/>). Telephone complaint to the Labour Inspectorate (SEPE) may be made through the citizens' service line: 1555.

b) Ombudsman: 17 Chalkokondyli st. - 10432 Athens, email: [press@synigoros.gr](mailto:press@synigoros.gr), Tel.: (+30) 213 1306 600.

c) Direct psychological support and counselling service for women victims of gender-based violence: SOS Line 15900.

**4-4.** The Company hereby informs its staff of the rights and the consequences of non-compliance within the framework of the employment relationship, as provided for in Articles 12–15 of Law No. 4808/2021 and as supplemented by the present.

**4-5.** The Company hereby informs the staff of the procedure for reporting or lodging complaints of incidents of violence or harassment adopted in Part B.

## **5. Designation of a reporting person (“liaison”) for the guidance and information of employees regarding the prevention and addressing of violence and harassment at work**

**5-1.** The Company designates as reporting person for these matters the employee of the Human Resources Department Mr Athanasiou Georgios (tel. 2103327481, e-mail: [Athanasidou@epikef.gr](mailto:Athanasidou@epikef.gr)).

**5-2.** The role of the reporting person is informative: it consists in guiding and informing employees, irrespective of whether they approach them in connection with an incident or complaint of violence and harassment or not. Employees' access to the reporting person is easy and direct and, for this purpose, the relevant means/channels of communication with them are provided.

**5-3.** In any case, it is the obligation of the above person to ensure the protection of Personal Data (PD), which may come to their knowledge in the exercise of their role.

**5-4.** Furthermore, the designated alternate liaison is the Secretariat of the General Directorate Ms Basdavanou Elisavet (tel. 2103327454, e-mail: [Ebasdavanou@epikef.gr](mailto:Ebasdavanou@epikef.gr)), who shall replace the regular Liaison in the event of any impediment, conflict of interest, suspicion of bias, or any other reason rendering the regular Liaison unable to handle the incident.

## **PART B Procedure for receipt and examination of complaints**

### **6. Communication channels - competent persons**

**6-1.** The Human Resources department is the designated competent person(s) or competent department (hereinafter “the competent persons”), which shall receive, examine and manage the complaints or grievances of affected persons regarding behaviours of violence or harassment.

**6-2.** The competent persons may perform their duties either exclusively or along with other duties and may either belong to the staff of the undertaking or cooperate with it.

**6-3.** The competent persons shall inform the affected person of their right, at any stage of the procedure followed within the undertaking, to also submit a complaint to the competent administrative authorities within the scope of their jurisdiction (Labour Inspectorate and the Ombudsman), as well as to the judicial authorities at their discretion.

**6-4.** Complaints shall be submitted either in writing, by delivering to the competent person a relevant written report of the affected person, or orally. Submission in writing shall also include the dispatch of an electronic message from the corporate address of the complainant. In the latter case, the competent person shall draw up a relevant note, recording the content of the complaint, and shall request the complainant to confirm the content of the complaint by affixing their signature.

**6-5.** In the event that the complaint concerns any of the persons competent for its receipt or handling, it may be submitted directly to the immediately higher hierarchical body of the Company or, where no such body exists, to the General Manager of the Company, who shall assign the investigation to a competent person not subject to a conflict of interest in relation to the specific complaint.

## **7. Investigation and examination of complaints with impartiality and protecting the confidentiality and personal data of the victims and the persons accused alike**

**7-1.** The Company and the above competent person undertake to receive and not to obstruct the receipt of, to investigate and to manage without delay any such complaint, to investigate and examine the allegations with impartiality and respect for human dignity, and to take immediate measures to protect the affected person.

**7-2.** In any case, it constitutes a commitment of the above persons or departments to ensure confidentiality and protect the Personal Data (PD) collected in the exercise of the above duties.

## **8. Procedure for investigation and evaluation**

**8-1.** Following receipt of the complaint, the competent person shall proceed to a preliminary investigation thereof in order to identify any obvious need for the supplementation of information by the complainant (e.g. determination of time or place of the incident, persons present or other circumstances, etc.).

**8-2.** Subsequently, they shall determine the evidence to be examined (e.g. correspondence records, audiovisual material where lawful recording exists, etc.), as well as the persons having knowledge of the actual facts who may provide testimony.

**8-3.** On the basis of the examination of the above evidence and the conduct of interviews with the above persons, the competent person shall draw up a report of findings in which they shall record their opinion

(a) on the substantiation of the complaint and the extent to which it may be considered probable, where it is not fully confirmed

(b) on the seriousness of the incident and the appropriate manner to address it

**8-4.** This report shall be submitted to the General Manager of the Company, who shall decide on the referral of the case to the Company's disciplinary bodies or on the adoption of other measures (e.g. preventive measures for the avoidance of recurrence of behaviours, possible referral to competent authorities in the case of particularly serious incidents, sanctions in the event of a false complaint, etc.).

**8-5.** For the performance of their duties with regard to the investigation of complaints, the competent persons shall request from the Company's Compliance Department to provide all necessary access to any type of Company records, invoking the existence of a complaint but without disclosing the identity of the complainant and the person accused.

**8-6.** Complaints which are proven to be manifestly malicious shall be considered inadmissible and shall be further investigated, where deemed necessary, as to their motives as well as to the persons involved, in order to restore order by every lawful means and method.

## **9. Prohibition of retaliation against the affected person**

**9-1.** Any adverse behaviour towards the affected person occurring as a consequence of filing a complaint or as a consequence of the refusal of the affected person to submit to behaviours of violence or harassment is prohibited and shall be treated as an incident of violence or harassment as defined herein, in accordance with Article 13 of Law No. 4808/2021 and the provisions of labour legislation.

## **10. Consequences upon establishment of violations**

**10-1.** In accordance with par. 2 of article 12 of Law No. 4808/2021, when an employee or other worker violates the prohibition of violence and harassment of article 4 of said Law, the Company shall take the necessary, appropriate and proportionate measures, on a case-by-case basis, regarding the person against whom the

complaint is made, in order to address this and prevent similar incidents or behaviours from recurring. These measures include:

- recommendations for compliance.
- the change of position, working hours, place or manner of performance of work.
- the termination of the employment or cooperation relationship.

**10-2.** The Company, as well as the above competent person or department designated for receiving and managing such complaints at Company level, shall cooperate with any competent public, administrative or judicial authority, which, either ex officio or at the request of the affected person, within its jurisdiction, requests the provision of data and information, and undertake to provide assistance and access to such data (par. 1 of article 5 of Law No. 4808/2021). To this end, any data collected, in any form, shall be kept in a relevant file in accordance with the provisions of the legislation on personal data protection.

#### **11. Protection of employment and supporting employees who are victims of domestic violence**

The Company demonstrates in practice its social responsibility towards the phenomenon of domestic violence, by examining on a case-by-case basis the need to grant special leave or to apply flexible working arrangements following a request by an employee who is a victim of domestic violence, in order to support them in maintaining their employment and in their smooth reintegration after such incidents, particularly in cases where there are minor children or children with disabilities or serious illnesses.