



# Management of Internal Complaints for Incidents of Violence and Harassment

## **PURPOSE**

In addressing and preventing violence and harassment in the workplace, Katradis Group has developed this policy for managing internal complaints of incidents of violence and harassment to inform employees about:

- **The method of submitting complaints,**
- **The procedure the company will follow after receiving the relevant complaint,**
- **The rights of employees who have experienced such unlawful behaviors, and**
- **The measures for addressing such incidents.**

Employees who have experienced or witnessed incidents of violence and harassment against others in the workplace are encouraged to report such behaviors immediately to the company's designated authority to ensure prompt measures are taken to combat and address such behaviors, aiming to secure a workplace free from violence and harassment.

The company is committed to thoroughly investigating each submitted complaint with due diligence, maintaining strict confidentiality and protecting all disclosed information, including personal data, while taking all necessary measures to prevent potential retaliation or adverse actions against the complainant.

## **AUTHORIZED PERSONNEL WITHIN THE COMPANY FOR RECEIVING AND EXAMINING COMPLAINTS**

If you experience or become aware of any behavior involving violence or harassment in the workplace, you may submit your complaint in writing to the Complaint Reception and Monitoring Officer (CRMO) via the following means:

- **By email at: [whistle@katradis.com](mailto:whistle@katradis.com)**
- **By post to the address: 11 Psaron & Anapafseos, Drapetsona, P.C. 186 48, addressed to the Complaint Reception and Monitoring Officer (CRMO).**

## **CONTENTS OF THE COMPLAINT**

The complaint must be submitted in writing and should include as many details as possible about the incident of violence or harassment, specifically mentioning:

- (a) The location and time of the incident,
- (b) The name of the person exhibiting the violent or harassing behavior,
- (c) The name of the person who experienced the behavior,
- (d) A detailed description of the incident, and
- (e) Any supporting evidence or testimonies confirming the validity of the complaint.

The more precise and substantiated a complaint, the easier and more effective its investigation.

The company reserves the right to contact the complainant if further details are needed.

Complaints must be truthful and submitted in good faith. Malicious complaints, defined as false allegations intended to damage the reputation of any employee, are expressly prohibited. The company reserves the right to impose disciplinary measures against individuals who submit such complaints.

#### **MANAGEMENT AND ASSESSMENT TEAM FOR INTERNAL COMPLAINTS**

For the purposes of implementing this policy and investigating complaints, the company establishes a Management Team for Internal Complaints (hereafter referred to as the "Management Team"). The team comprises three members: the Complaint Reception and Monitoring Officer (CRMO), the HR and Payroll Manager, and the Group's General Manager. If evidence suggests that a complaint is substantiated, the Management Team gathers all relevant materials, initiates disciplinary procedures, and imposes penalties proportionate to the offense's severity.

If the complaint involves a member of the Management Team, that individual must immediately report to the CEO, requesting exclusion due to a conflict of interest. A replacement will be appointed by the CEO.

#### **CONFIDENTIALITY AND DATA PROTECTION**

The company and the Management Team are obligated to handle complaints with strict confidentiality, refraining from disclosing any information related to the complaint or the involved parties unless legally required or requested by a judicial or administrative authority.

The company complies with Law 4808/2021 for workplace protection and processes personal data in complaints per national and EU data protection laws, including GDPR 679/2016 and Law 4624/2019.

#### **PROTECTION OF THE COMPLAINANT – PROHIBITION OF RETALIATION**

Katradis Group is committed to protecting employees who, in good faith, report any incidents of violence or harassment. Retaliatory actions such as threats, intimidation, adverse employment actions, or any other detrimental effects are strictly prohibited.

The company will take immediate measures against any individuals found to have engaged in retaliatory actions.

KATRADIS Group  
Yannis Kontakis, General Manager