



**WORKPLACE NON-DISCRIMINATION, ANTI-HARASSMENT AND VIOLENCE  
PREVENTION POLICY**

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**1. AIM OF POLICY**

The aim of this policy is to prevent and combat every form of discrimination based on personal characteristics and choices and every form of violence and harassment occurring in the course of, linked with, or arising out of, work.

**2. SCOPE OF APPLICATION**

This Policy applies to the Management and members of LAMDA Development Group (the "Group") companies, workers and employees under employment contract, retainer agreement, works contract, independent contractor contract, temporary employment contract, agency workers, trainees, interns and apprentices, workers whose employment with a Group company has been terminated, prospective Group company employees, other persons who enter into transactions or work with the Group.

**3. STATEMENT OF ZERO TOLERANCE TO DISCRIMINATION, VIOLENCE AND HARRASSMENT - ASSESSMENT OF RISK**

LAMDA Development Group of Companies (the "Group") is committed to combating and eliminating discrimination, violence and harassment in the workplace, with a view to ensuring a work environment that fosters respect for human dignity and bans discrimination on the basis of personal characteristics and choices.

It is expressly and unequivocally stated that any form of discrimination, violence and harassment occurring in the course of, linked with, or arising out of, work, is strictly prohibited.

The following non-exhaustive list of behaviours is strictly banned by the Group: innuendos; mockery, lewd or sexist or racist jokes or remarks; the use of offensive language; comments about a person's physical appearance or character which cause embarrassment or distress; spying, stalking, unwelcome verbal or physical attention towards an individual; sending sexually suggestive text messages, emails, social media messages, faxes or letters; intrusive or persistent questioning about a person's age, marital status, personal life, sexual interests or orientation, or similar questions about a person's racial or ethnic origin, including their culture or religion; sexually suggestive gestures or repeated requests for dates or threats; suggestions that sexual favours may further a person's career, or that not offering them may adversely affect their career in the Group; rude gestures, touching, or other unwelcome bodily contact; spreading malicious rumours, or insulting someone, particularly due to discrimination on the grounds of age, gender, marriage, civil partnership, pregnancy and maternity, disability, sexual orientation and religion or belief; verbal or physical threats or abuse, such as swearing, in private or in public; belittling or ridiculing a person, or his/her abilities, in private or in public; sudden rages or displays of temper against an individual; persistent or unjustified criticism; ignoring or excluding an individual from social events, team meetings, discussions and collective decisions or planning; cyber bullying and harassment, abusive emails, letters and phone calls.

The Group is committed to receive, investigate and handle every relevant complaint, showing zero tolerance for discrimination, violence and harassment, and to treat all grievances in confidence and with respect for human dignity. The Group also affirms its commitment to not obstruct the receipt, investigation and handling of such complaints.

The Group makes a commitment to provide assistance to every competent public, administrative or judicial authority during the investigation of each incident of violence and harassment.

Appropriate and proportionate measures shall be taken on a case-by-case basis for those employees and parties related to the Group in any manner that breach the obligations under this Policy, in order to prevent any similar incident or conduct from happening again.

In order to eliminate discrimination, violence and harassment, the Group has put in place a comprehensive mechanism for the filing, handling and investigation of reports, by establishing dedicated reporting channels and by developing a framework of Policies and Procedures. More specifically, the Group's principles are reflected in the Reporting and Internal Reports Investigation Policies, by means of which the Group aims to prevent and resolve issues of violence and harassment in the workplace. The individual Reporting, Management and Internal Investigation Procedures, provide the detailed steps that every reporting person needs to follow, as well as the competencies of the Group's bodies and the actions that must be taken by them in order to ensure the effective handling of relevant incidents.

## **4. DEFINITIONS**

### 4.1. Discrimination

Discrimination shall mean discrimination on the basis of sex/gender, race, colour, ethnic or social origin, genetic characteristics, language, religion or belief, political opinions, disability or state of health, age or sexual orientation.

### 4.2. Violence and Harassment

The term "Violence and Harassment" refers to a range of behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm.

Harassment is also defined as conduct occurring with the purpose or effect of violating human dignity and of creating an intimidating, hostile, degrading, humiliating or offensive environment, regardless if such conduct is a form of discrimination, and includes harassment based on gender or other grounds of discrimination.

Forms of harassment banned by this policy include, but are not limited to:

- Verbal harassment, including derogatory remarks, insults or accusations;
- Physical harassment, including physical interference with normal work or movement;
- Visual harassment, e.g. posters, animated films, cartoons, photographs or drawings that are degrading based on protected characteristics;
- Retaliation or bullying for reporting or threat of reporting of any of the above forms of harassment or for cooperating in the investigation of a harassment incident.

#### 4.3. Gender-based & Sexual Harassment

Gender-based harassment is conduct based on an individual's perceived sex, aiming to violate the dignity of said individual and to create an intimidating, hostile, degrading, humiliating or offensive environment. This form of harassment includes sexual harassment as well as discrimination on the basis of sexual orientation, gender expression, gender identity or sex characteristics.

More specifically, sexual harassment is an unwanted conduct of sexual nature, including unwelcome sexual advances, requests for sexual favours, and any other unwelcome physical or verbal conduct of a sexual nature. Sexual harassers or victims of sexual harassment may be of any sex or gender. Some examples of sexual harassment are provided below for illustration purposes only:

- The offer of benefits (e.g. a promotion or raise) in exchange for sexual favours, or the creation of an environment that promotes sexual intercourse as a means for career advancement;
- Retaliation or threats of retaliation for rejecting sexual advances;
- Visual harassment: obscene gestures, display of sexually explicit electronic or paper material (e.g. email, voice email, books, files, photos, etc.), cartoons or posters, or any indecent or sexually suggestive material;
- Verbal harassment: belittling remarks, sexual innuendo, use of obscene language or "jokes" of a sexual nature;
- Verbal sexual harassment or advances;
- Sexual verbal abuse: sexist remarks about the body of an individual, disparaging description of an individual, sexually suggestive or lewd remarks in conversations, letters, invitations, notes or other comments, and labelling;
- Physical contact: touching, pinching, sexually suggestive gestures, patting, stroking, grabbing, pushing, etc.

The above examples are for illustrative purposes only and not an exhaustive list of prohibited conduct. The employee or third party engaging in such prohibited conduct must and shall bear full responsibility for his/her actions.

#### 4.4. Retaliation

The Group shall also prohibit any employee or third party that is related to the Group in any way from proceeding to retaliation acts against any other employee or third party that opposes violence or any form of harassment, makes a complaint, testifies, assists or participates in any incident investigation procedure.

## **5. MEASURES FOR THE PREVENTION, CONTROL AND MITIGATION OF RISKS - RAISING AWARENESS**

Every employee and third party related to the Group in any manner must comply with this policy.

This policy applies both to the workplace and to any place where company or group meetings and work-related conferences and events are held, inside or outside the Group premises, and whether involving physical presence or remote participation via the internet or phone.

The Group shall foster an accessible, safe and friendly work environment in which the relationships between employees, team members, Management and Group companies are defined by mutual respect, honesty, understanding, trust, cooperation and support.

The Group shall, to the extent possible, take any and all appropriate measures and shall proceed to every reasonable adjustment of working conditions in order to protect the employment and to support employees that are victims of domestic violence.

The Group shall take all necessary measures to inform and raise awareness among the personnel, using appropriate means (e.g. paper and electronic material, etc.) to combat violence and harassment, by ensuring that everyone is aware of the policy and the procedure of the Group regarding violence and harassment incidents and that everyone knows where to turn to in case of violence or harassment.

The Group trains its officers to recognise discrimination, violence and harassment in the workplace and to provide the personnel and its associates the necessary support.

The Group encourages its employees and any third party that is in any way related to it to report incidents of discrimination, violence and harassment in the workplace that they might witness.

## **6. REPORTING, INVESTIGATION AND HANDLING OF COMPLAINTS**

If any employee of the Group or any third party that is in any way related to it believes that s/he has suffered discrimination, violence or any form of harassment, or if s/he has been aware of any such conduct occurring in the workplace, s/he must follow the steps provided in the Reporting Procedure in order to bring a complaint about the incident. The Group has established the appropriate mechanisms for the conduct of a fair, timely, thorough and objective investigation, according to the Reporting Management and the Internal Reporting Investigation Procedures. Moreover, all necessary measures have been taken in order to ensure cooperation of all involved parties, whether employees or third parties, according to the Internal Reporting Investigation Procedure. The Group shall treat every complaint of discrimination, violence and harassment in strict confidence and with the utmost discretion.

Reporting persons shall be given a report receipt notification and shall receive regular updates on the progress of investigation of their reports, according to the Reporting Management Procedure. Upon completion of the investigation, the Group shall communicate the results of the investigation as soon as practically possible and expedient.

If any employee of the Group or any third party that is in any way related to it believes that s/he has been the victim of retaliatory actions as a result of making a complaint or providing assistance in a discrimination, violence and/or harassment investigation process, s/he must follow the steps provided in the Group's Reporting Policy in order to immediately report the retaliation.

Complaints about forms of conduct that violate this agreement shall be accepted only in writing, by name or anonymously, according to the reporting policy, and shall be investigated immediately and thoroughly.

In order to ensure safety in the workplace and to safeguard the integrity of the investigation, the Group may, *inter alia*, transfer employees or modify their working hours, pending the outcome of the investigation. During that period, access to buildings and/or facilities might be denied in whole or in part.

If the results of the investigation show that a discrimination, violence or harassment or retaliation incident has occurred, the Group shall take the appropriate corrective, disciplinary and/or other actions against the perpetrator.

Such actions may include (indicatively and without limitation): (a) disciplinary actions; (b) reassignment to another position, change of working hours, place or manner of work provision; (c) termination of employment contract or provision of services agreement; (d) legal action.

In any event, the offender may have criminal or civil liability, according to the applicable laws.

This Policy applies in conjunction with the applicable general laws on the protection of the employee's personality, without prejudice to the employee's legal rights under civil-law and criminal-law or the right to lodge a Complaint with the competent Audit Authority.

## **7. MALICIOUS REPORTING**

Reports proven to be manifestly malicious shall be rejected as inadmissible and shall be further investigated, at the Group's discretion, both as regards the motives as well as the parties involved, so as to restore order in any legal manner and by any legal means.



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**8. FURTHER INFORMATION - CONTACT PERSONS**

Any queries on the implementation or interpretation of this policy must be addressed to the Group's CHRO, who is appointed as the competent Contact Person in charge of informing and consulting the personnel and responsible for issues of prevention and combating of violence and harassment in the workplace.

**9. TABLE OF HISTORICAL CHANGES**

Version	Date	Description of Changes
1.0	09/2021	Version

**10. TABLE OF AUDITS AND APPROVALS**

	Organizational Unit	Title / Name of Authorised Officer	Date
Policy Unit:	Group HR Division	Group CHRO	09/2021