



Policy on Preventing and Fighting Workplace Discrimination, Violence and Harassment

1. Principles and commitments: Human Rights at Work

Respect for human rights and the principle of equal opportunities govern all the Group's HR management policies, procedures and practices, ensuring a working environment that fosters respect and human dignity, while embracing and integrating diversity. Piraeus Financial Holdings Group has endorsed the principles of the UN Global Compact regarding Human Rights, the Women's Empowerment Principles (WEP's) and has also signed up to the UN Principles for Responsible Banking.

The Group acknowledges the responsibility for a working environment that promotes respect and equal opportunities by establishing the Human Rights Policy, Employee Regulation, Code of Conduct and Ethics, and this Policy and Procedure on Preventing and Fighting Workplace Discrimination, Violence and Harassment.

It highlights the principles and values and describes the desired behaviours so that employees show respect, ethics and objectivity towards their colleagues and encourage similar behaviours through their attitude.

2. Declaration of Zero Tolerance for all forms of workplace discrimination, violence and harassment

The Bank expressly and unequivocally declares that all forms of violence and harassment occurring in the course of work, whether related to or resulting from it, including gender-based and sexual violence and harassment, are prohibited and expresses its commitment to addressing and eliminating them.

The Bank undertakes to receive, investigate and handle any relevant complaint showing zero tolerance to violence and harassment, with confidentiality and respect for human dignity.

3. Purpose and Scope

The Bank shall take all measures and comply with all obligations relating to the implementation of the provisions of Part II of Law 4808/2021 on the prevention and management of all forms of violence and harassment, including gender-based and sexual violence and harassment.

The purpose of this policy includes the prevention of and fight against all forms of discrimination based on personal characteristics and choices; and the establishment and consolidation of a working environment that respects, promotes and safeguards human dignity and the right of every human being to a world of work free from violence and harassment.



Piraeus Bank declares that it recognizes and respects the right of every employee to a working environment free from violence and harassment, and that it does not tolerate any such conduct, in any form by any person, employee, partner, client or visitor manifested in the course of the work, whether connected to it or arising from it.

It applies to the employees of the Bank (incl. Group Subsidiaries) regardless of their contractual status, including those with contract of employment, independent services, salaried mandate, third party services, as well as persons undergoing training, including trainees and apprentices, volunteers and employees whose employment relationship has ended, as well as job seekers.

4. Definitions:

a. Violence and Harassment

According to the European Agency for Safety and Health at Work, violence at work is any incident where a person is intentionally abused, threatened, or assaulted at work, and which endangers their safety, health, well-being, or work performance. It covers insults, threats, physical or psychological aggression exerted by people from inside or outside the organisation against a person at work. There may be a racial or sexual dimension to the violence.

Workplace harassment is defined as unreasonable and repeated behaviour towards an employee or group of employees, which represents a health and safety risk. Unreasonable behaviour is defined as that which makes an employee feel unfairly treated, humiliated and undermined, considering all the prevalent conditions at their workplace. Health and safety risks include the risk to the mental and physical health of employees. Harassment can be aggressive behaviour, both verbal and physical, as well as less obvious actions such as the undervaluation of an employee's work or his/her social isolation in the workplace. Harassment often involves the element of misuse or abuse of power, from which victims cannot be protected. The concept of harassment may include physical, psychological, sexual and/or financial harm to the victim.

Gender-based harassment means forms of conduct based on a person's gender, which have the purpose or effect of violating their dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment (Law 3896/Government Gazette 207/8.12.2010) and paragraph 2 of Article 2 of Law 4443/2016. Such forms include sexual harassment, as well as forms of behaviour related to sexual orientation, expression, gender identity or characteristics.

Specifically, sexual harassment is defined as any unwanted conduct of a sexual nature, including unwanted sexual advances as well as any unwanted physical, verbal or psychological conduct of a sexual nature.



Workplace violence and harassment forms include:

- verbal abuse, such as intimidating, offensive comments;
- threats of any kind;
- degrading, offensive or humiliating behaviour;
- cyberbullying;
- systematic exclusion of a person from meetings of their work group;
- physical violence and gestures (touching, pinching, pushing);
- retaliation or intimidation for reporting or threat of reporting;
- sexual harassment;
- visual forms of harassment such as photographs which are derogatory to the recipient;
- offer of benefits (e.g. professional development) in exchange for a sexual favour;
- spreading malicious comments or insulting someone due to discrimination (including on the grounds of age, gender, any disability, sexual orientation, etc.);
- sexual innuendos etc.

The above are indicative examples and not an exhaustive list of prohibited acts falling under the definitions of violence and harassment.

In this context and in order to avoid misunderstandings and/or misinterpretations in the implementation of this policy, it is clarified that any act within the scope of the management prerogative regarding employee supervision, work performance evaluation and overall presence at work, does not constitute violence and harassment.

b. Workplace

Workplace is defined as any place where the employee delivers work; commutes to and from; goes on business trip; attends training, social events and work-related activities, both in person and online; and take a break in sanitary and welfare facilities.

The Bank undertakes in any case to evaluate and, if proven to be reliable, to investigate any incident reported in accordance with the Internal Complaint Management Procedure against Violence and Harassment at Work.

5. Prevention Measures to Eliminate Violence and Harassment

a. Communication & Information Channels

The Bank acknowledges that violence and harassment can have a significant impact on the mental well-being of the victims. It recognises that violence and harassment incidents can lead to higher rates of absence from



work, reduced performance and productivity, not only with regard to the individuals targeted by the harassment, but also other employees, who are subject to the heavy psychosocial climate at the workplace.

Therefore, the Bank takes care and ensures a working environment that promotes communication, information and training through different channels.

In particular, to achieve two-way communication at all levels, it provides all employees with multiple communication and information channels, including:

- the Intranet, HR Portal, Yello,
- Organizational Health
- HR Business Partners of Group HR,
- Communication with special roles (Occupational Physician),
- Support Channels (Employee Help Line)

b. Optional Initial actions to deal with violence and harassment before contacting the Whistle Blowing Channel

Employees are encouraged to be informed via the communication channels about the Group's Policies and Procedures. If any employee of the Bank, with any contract status, believes that they are subject to any form of violence or harassment and wishes that the incident be addressed, they may follow the steps listed below before contacting the Whistle Blowing Channel.

- Ask the person(s) causing the problem to stop;
- Submit their dissatisfaction in writing to the person causing the problem;
- Discuss the problem with their supervisors or a member of Group HR.

c. Training

The Bank will provide employees with information material on the potential violence and harassment risks at the workplace and any information on prevention and protection measures, whistle blowing procedures, ways of handling such behaviour, as well as contact details of the relevant administrative and judicial authorities, in accordance with the applicable provisions, and reporting through the Bank's internal communication channels.

The Group will train its managers to identify discrimination, violence and harassment, gender-based harassment and sexual harassment at work, and domestic violence so as to provide the necessary support to its employees and partners.

The Bank will regularly create educational or awareness training modules and seminars for all employees across all hierarchical levels, as well as for its managers, in order for them to be able to identify violence and harassment incidents at the workplace. In this manner, everyone will be encouraged to participate in training



and awareness programs on the Group's policy and procedures regarding violence and harassment incidents, and on where they can turn in the event of violence and harassment incident or behaviour.

d. Risk Assessment

The assessment of psychosocial risks, including the risks of violence and harassment, is a statutory obligation of the Bank to ensure the health and safety of its employees, as well as of third parties employed on its premises.

For this reason, the Bank has incorporated the relevant parameters into the Occupational Risk Assessment Study, as well as in the responsibilities of the Occupational Doctor, in order to reduce psychosocial risks and provide its employees with an additional channel of communication through the regular meetings with the Occupational Doctor under the respective legislation (Law 3850/2010). Specifically, Occupational Doctor, who visit the facilities on a regular basis, are also responsible for informing the employees about the rights and the whistle blowing procedure.

At the same time, they advise on the prevention of violence and harassment at work, including sexual harassment, and inform employees, inter alia, of the risks.

e. Employee Assistance Programs

The Bank has also ensured a healthy working environment by providing specialized Employee Assistance Programs (EAPs) through an expert external provider.

Beneficiaries (employees and family members) have access to a 24/7 hotline for any personal, family and work issue that concerns them, and receive assistance and guidance to deal with any challenges. If they are concerned by a violence and harassment issue, they receive guidance so as to be empowered to deal with the perpetrator and, at the same time, contact the internal channels to report the issue in order to be handled.

6. Management of Domestic Violence Incidents

Domestic violence includes all acts of physical, sexual, psychological and economic violence that take place within the family and regardless of whether the perpetrator shares or used to share the same household with the victim.

Within the limits of its capabilities, the Bank, upon becoming aware of a domestic violence incident, undertakes to take all appropriate actions and make all reasonable adjustments to working conditions, in order to protect employment and support victims of domestic violence.

Support measures for employees who have suffered domestic violence include:

- Flexible working arrangements (e.g. special leave);



- Safety measures at the workplace (e.g. work in a non-isolated area);
- Provision of empowerment and psychological support through Employee Assistance Programs.

7. Reference Person and Contact Information

For any information, clarification or question regarding this Policy, interested parties can call the reference person who is the Head of the Organisational Health of Group HR, currently represented by Ms. Arianna Inglezaki (Telephone: 210 3288261 - 6951659074 and/or email inglezakiA@piraeusbank.gr), adding the distinctive title "Violence and Harassment at Work" to the Subject field.

Policy on the Management of Internal Workplace Violence and Harassment Complaints

1. Whistleblowing Report Receipt and Management System of the Bank.

Reports to the Whistle Blowing Channel for the management of issues related to misconduct, violence and harassment at the workplace.

If any employee believes that he/she has experienced an incident of violence and/or any form of harassment or has identified such behaviour in the workplace, the Bank encourages both named and anonymous reports.

The fundamental and inviolable principle is to protect the anonymity and confidentiality of the data of the persons submitting such reports / complaints and ensure that their current position and future professional development are not compromised.

Any employee subject to the scope of this Policy may communicate / report a violence and harassment incident using one of the channels below.

Specifically:

- **mail to a post office box** (Piraeus Bank PO Box 13614, Hellenic Post (ELTA) of Syntagma Sq);
- **via e-mail to the special e-mail address "whistleblowing@piraeusbank.gr"**, which is accessible exclusively to the Head of Group Internal Audit and the Head of Group Human Resources.

In the event that any other employee of the Bank/ Group receives such a report, they should record it in the inbox of their Unit and either send it to the special e-mail address 'whistleblowing@piraeusbank.gr' or enclose it in an envelope and send it to the above mailbox immediately.

Employees need to be encouraged to keep notes on all incidents and actions taken to stop violence and harassment incidents, as well as any support requests they have submitted on Bank's internal communication channels.



In the case of an oral report, the complainant shall be encouraged to submit their detailed report in writing according to the whistle blowing policy and procedure.

Moreover, in case of an anonymous report, the complainant shall be encouraged to also submit it by identifying themselves.

In any case, it is reminded that the Bank commits itself to protecting the anonymity and confidentiality of the complainant's data, as well as to ensuring that their current position and future professional development are not compromised.

2. Evaluation of confidential reports

Confidential reports by employees and third parties concerning the Piraeus Bank Group shall be evaluated by the **Anti-Violence and Anti - Harassment Complaint Management Committee** always ensuring impartiality and protection of the confidentiality of the personal data of victims and respondents.

The Violence and Harassment Complaint Management Committee consists of: the Head of Group Internal Audit, the Head of Group Human Resources, the Head of Group Compliance, the Head of Group Risk Management, the Management Consultant and the President of the Representative Employees' Union.

3. Investigation of a Complaint Report

The Violence and Harassment Complaint Management Committee investigates the reliability of the report based on the information provided and if the complaint is deemed reliable, it is assigned for investigation in accordance with the Whistle blowing Procedure by Group HR.

Group HR investigates the case, gathering evidence and findings to determine whether the complaint is confirmed, as well as the importance of the situation.

Following the investigation by Group HR, the Violence and Harassment Complaint Management Committee reconvenes in order to consider all the information and recommend any necessary actions against the person involved, in accordance with the Bank's internal procedures.

Reports and complaints which -in implementation of the procedures under this policy- prove to be manifestly malicious shall be considered inadmissible and will be further investigated at the discretion of the Committee, both in terms of motives and parties involved. In the event of proven malicious complaints, the Violence and Harassment Complaint Management Committee shall recommend to Group HR any necessary actions against the parties involved.



4. Provisional Measures for the Complainant

Group HR shall, if necessary and subject to the agreement the whistle blower, take measures to protect the latter until the complaint/report is fully investigated.

Actions for the whistle blower may include special paid leave, remote working subject to the nature of duties or transfer to another function.

5. Protection from Retaliatory Actions

The Group is committed to protecting the employees who made a report in good faith from any retaliatory actions in accordance with the "Framework for the Protection of Employees against Potential Retaliatory Actions".

The Bank shall never retaliate or allow retaliation against the whistle blower of a violence or harassment incident. In particular, any unfavourable treatment of the whistle blower is prohibited, since it constitutes vindictiveness or retaliatory action in the sense of Article 14 of Law 3896/2010. Termination or dissolution in any way of the employment relationship shall be null and void, if it constitutes vindictiveness or retaliatory action in the sense of Article 14 of Law 3896/2010 against the report of a violence and harassment incident under Article 4, as set out under B.1 hereof (Principles and commitments).

6. Sanctions against the Complainant

In the event that a complaint for violation of the principles of the Policy on Preventing and Fighting Workplace Discrimination, Violence and Harassment, the necessary actions shall be taken by Group HR in accordance with the Bank's internal procedures, as set out under B.1 hereof (Principles and commitments).

Specifically, the necessary appropriate and proportionate measures shall be taken against the complainant in order to prevent and avoid recurrence of such incident or behaviour.

The measures shall include compliance recommendation, change of the position, working hours, place or manner of employment, and disciplinary measures as laid down in order of priority or depending on the gravity of the misconduct, including:

- Oral warning
- Written warning
- Written reprimand
- Fines up to 25% of wages
- Temporary unpaid suspension for up to 3 months
- Termination of employment



7. Rights of Affected Persons

This Policy shall be implemented along with the applicable legislation on the protection of human dignity and **shall not affect the legal rights of employees under the civil and criminal law**, or their rights to submit a complaint before the authorities of the competent Supervisory authority.

In particular, every employee has the right to :

- **Submit a complaint through the Bank's official channel;**
- **Appeal to the Labour Inspectorate** calling the Citizens Hotline 1555 and the Labour Inspectorate Complaints Hotline 15512;
- **Contact the Ombudsman**, email: press@synigoros.gr, 213 1306 600.

The Bank also undertakes to provide assistance and access to any competent public, administrative or judicial authority, during the investigation of any incident of violence and harassment at the workplace.

8. Policy Evaluation and Optimisation

The Bank undertakes to evaluate this Policy in compliance with the requirements of the applicable laws and regulations, ensuring it is constantly up-to-date.

In the event that this Policy needs to be amended, for the purpose of fighting discrimination, violence and harassment and managing internal complaints, the Bank and the Union representatives shall negotiate and sign the amendments, which will be included as an appendix hereto.

The Bank shall post this policy and procedure on all internal communication channels so that all employees take knowledge of it.