

**\*\*POLICY FOR THE PREVENTION AND COMBAT OF VIOLENCE AND THE PROCEDURE FOR RECEIVING AND EXAMINING SUCH COMPLAINTS\*\***

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**\*\*I. PREAMBLE\*\***

1. The tourism services company operating under the trade name "MID EAST LTD" (hereinafter referred to as "the Company") declares that it recognizes and respects the right of every person to a work environment free from violence and harassment and that it does not tolerate any such behavior of any form from and towards any person. Any form of violence and harassment is strictly prohibited and is not tolerated within the premises and operational framework of the Company.

2. The Company complies with all measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and handling of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, and is responsible for ensuring and maintaining a safe, decent, and friendly working environment for its employees, visitors, clients, and partners.

3. This Policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the applicable regulatory legislation, as amended, and applies to the persons referred to in paragraph 1 of Article 3 of Law 4808/2021.

## **\*\*II. PURPOSE\*\***

The purpose of this policy is to create and establish a working environment that respects, promotes, and ensures human dignity and the right of every person to a world of work without violence and harassment.

## **\*\*III. DEFINITIONS\*\***

For the purposes of this Policy, the following definitions apply:

- **\*\*Harassment\*\***: Any unwanted behavior related to a person's gender, sexual orientation, and gender identity, which has the purpose or effect of violating their dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.

- **\*\*Sexual Harassment\*\***: Any unwanted verbal, psychological, or physical behavior of a direct or indirect sexual nature, which has the purpose or effect of offending a person's personality, particularly by creating an intimidating, degrading, humiliating, or offensive environment around them.

This behavior can be isolated or systematic. It does not matter how the harasser perceives their behavior towards the harassed individual, nor is it necessary for the harassed individual to inform the harasser that their behavior is unwanted.

The intention of the harasser is irrelevant. What matters is that the harassed individual reasonably perceives the behavior as unpleasant, offensive, intimidating, or humiliating. Sexual harassment is not always easily recognizable. Someone may consider behavior as mere teasing or a joke and not intend harassment. However, when the other person is disturbed by this behavior and finds it suggestive, offensive, or threatening, an issue arises and intervention is required.

### ### FORMS OF SEXUAL HARASSMENT

- **Verbal Behavior**: Examples include sexual comments, jokes, anecdotes, and gestures; immoral and offensive comments about gender or sexual orientation; orchestrating discussions on sexual topics; describing one's sexual life in front of others; intrusive questions about personal or sexual life; sexual innuendos; insults; and invitations to dates or sexual encounters.

- **Non-verbal Behavior**: Examples include unwanted touching of clothing, hair, or other body parts; caresses; kisses; unnecessary physical proximity; sexual movements; and obscene gestures.

- **Visual Behavior**: Examples include lewd gestures; surveillance of personal life (e.g., social media); attempts to distribute sexual material such as images, magazines, videos, etc.

- **Other Forms of Remote Behavior via Internet or Other Means or Information Technology**: Examples include written content of a sexual nature; related phone calls; messages and emails; displaying photos; posting sexual images or movies; spreading sexist rumors.

### ### IV. IMPACTS OF VIOLENCE, HARASSMENT, AND SEXUAL HARASSMENT

Violence, harassment, and sexual harassment infringe on the dignity of victims. They lead to decreased self-esteem, intense feelings of fear, anger, and exploitation, which can further impact the physical and mental health of the individual. It has been observed that these behaviors disrupt the victim's interpersonal and family relationships, reduce their performance in the workplace, alter and alienate the victim's character and behavior, and enhance psychological disturbance and imbalance.

Interpersonal violence, such as sexual harassment, is one of the most traumatic events a person can experience, particularly women or young girls. If we respond to the immediate needs of the victims and show them that we believe them and take the matter seriously, we help to limit further harmful effects. It is equally important to continue supporting the victims until they recover, in the manner and timing they desire.

### ### V. PREVENTION AND COMBAT OF VIOLENCE AND HARASSMENT AT WORK

#### \*\*A) Risk Assessment of Violence and Harassment at Work\*\*

The Company regularly conducts assessments of psychosocial risks at work, which include risks of violence and harassment, and takes necessary measures to limit and prevent them according to the guidelines and suggestions of the occupational physician and safety technician.

#### \*\*B) Measures for the Prevention, Control, Limitation, and Handling of Risks of Violence and Harassment at Work, and for Monitoring such Incidents or Behaviors\*\*

To prevent, control, limit, and handle the risks of violence, and to monitor such incidents or behaviors, the Company takes the following measures:

- Conducts information and awareness activities for staff on the prevention and handling of violence and harassment at work.
- Provides training for employees to recognize, prevent, and effectively manage incidents and behaviors or attempts of violence and harassment while performing their duties.
- Implements technical measures and certified spatial organization standards recommended or suggested by the safety technician and any competent administrative authority, contributing to the prevention, avoidance, and handling of incidents of violence and harassment.
- Implements measures recommended or suggested by the occupational physician and any competent administrative authority to support victims of violence and harassment, and victims of domestic violence, and to reasonably accommodate them at work.
- Encourages reporting unwanted behaviors.

- Implements an easily accessible process for staff and any third interested party to submit and investigate complaints/reports of violence, harassment, and sexual harassment, maintaining principles of confidentiality, trust, objectivity, and impartiality.
- Assists in timely addressing all reports/complaints with seriousness, sensitivity, justice, and confidentiality.
- Guarantees confidentiality and disclosure of issues arising from the Evaluation Report.
- The designated "Link" Person prepares a triennial report of the current Policy for the prevention and handling of risks of violence and harassment at work, suggesting revisions after prior consultation with the staff.
- Promotes and encourages appropriate standards of behavior at work.

The Company specifically provides the following **\*\*Guidelines for the Prevention of Violence, Harassment, and Sexual Harassment\*\*** and for handling such incidents or behaviors:

**\*\*Guidelines for the Prevention of Violence, Harassment, and Sexual Harassment\*\***

- Avoid discussions, comments, insinuations, gestures, expressions that target or reference gender, sexual orientation, or gender identity of any individual (employee, colleague, client, supplier, partner).
- Correct your behavior when you realize it bothers or offends colleagues, clients, partners, collaborators, supervisors, and employers, and do not hesitate to apologize.
- Set your personal boundaries in your relationships.
- Collaborate with specialists, psychologists, and anyone who can help to eliminate the phenomenon.

**\*\*Guidelines for Dealing with Harassment and Sexual Harassment\*\***

- Do not ignore or underestimate the unpleasant feelings caused by unwanted behavior.
- Trust your judgment about the behavior of the person harassing you.
- Do not feel uncomfortable, ashamed, or blame yourself for the perpetrator's behavior (client, partner, collaborator, colleague, supervisor, employer, etc.).
- Do not choose to isolate yourself from others.

- Do not justify the perpetrator's behavior and do not unjustly self-blame.

### ### C) Information and Awareness Actions for Staff

1. The Company is committed to providing the staff with information and details on the prevention and handling of incidents of violence and harassment, using any suitable and appropriate means, as needed. Additionally, upon request, the Company offers personalized information to specific employees regarding related preventive and protective measures, the procedures existing within the Company, and the options available by law in such cases.

2. The Company maintains this Policy posted in a visible spot within the workplace and on its official website.

3. Every employee, partner, and client can access information on issues of violence and harassment and the related Company Policy. They can find useful informational material or access helpful links or platforms on the website [www.mideast.gr](http://www.mideast.gr). Furthermore, any employee or interested third party can request information or details on related topics via email at [HRC@mideast.gr](mailto:HRC@mideast.gr). The Company commits to responding within seven (7) working days.

### ### D) Information on the Rights and Obligations of Employees and the Employer in Case of Incidents, Reports, or Complaints of Violence or Harassment, and the Related Procedure

The Company has an obligation to provide clear and adequate information regarding the rights and obligations of employees and those exercising managerial rights or representing the Company, to the extent and degree of their responsibility, in case of incidents, reports, or complaints of violence or harassment, as well as the related procedure.

More specifically:

**\*\*General Obligations of the Company for the Prevention and Handling of Violence and Harassment:\*\***

a) Exhibit zero tolerance for violence and harassment.

b) Provide employees with information related to the potential risks of violence and harassment in the workplace and the related preventive and protective measures, including the obligations and rights of employees and the Company in such incidents.

c) Post and make accessible information within the workplace on the procedures existing within the Company for reporting and handling such behaviors, along with contact details for the competent administrative and judicial authorities as per the applicable provisions.

**\*\*Company Obligations in Case of Violence or Harassment Against an Employee or Third Party:\*\***

- Inform the affected person by the designated Link Person of the Company about their rights and the way to exercise them within the internal complaint handling process and before the competent administrative and judicial authorities.
- Receive, investigate, and handle the complaint or report confidentially and respectfully, refraining from any action that obstructs the reception, investigation, and handling of these complaints and reports.
- Assist and provide access to any public, administrative, or judicial authority in investigating such incidents or behaviors, if duly requested.
- Take necessary, appropriate, and proportional measures against the accused to prevent and avoid recurrence of similar incidents or behaviors and to protect the affected person. These measures may include compliance recommendations for the accused, changes in position, working hours, place, or manner of work, or even termination of employment or cooperation, subject to the prohibition of abuse of rights under Article 281 of the Civil Code.

**\*\*Rights of the Affected Person - Consequences of Violating the Prohibition of Violence and Harassment\*\***

Every person affected by an incident of violence or harassment, even if the relationship within which the incident or behavior occurred has ended, has:

- a) The right to judicial protection before civil courts for full compensation, including positive and consequential damages and moral harm, and the right to judicial protection before criminal courts.
- b) The right to appeal, file a complaint, and request a labor dispute investigation before the Labor Inspectorate, within its legal competencies.
- c) The right to report to the Ombudsman, within its legal competencies.
- d) The right to file a complaint within the Company according to this Complaint Handling Policy.



In any case, when a report or complaint of such behavior arises within the Company, the affected person retains the right to appeal to any competent authority.

e) The right to leave the workplace for a reasonable period without loss of wages or other adverse consequences, if they reasonably believe there is an imminent serious threat to their life, health, or safety, especially when the accused person exercises managerial rights or legally represents the Company or when the Company fails to take necessary measures to restore workplace peace, or when such measures are inadequate to stop the behavior of violence and harassment.

In this case, the affected person must inform the Company, legally represented, in writing, citing the incident of violence and harassment and the circumstances justifying their belief in an imminent serious threat to their life, health, or safety. If the threat does not exist or has ceased to exist, and the affected person refuses to return to the workplace, the Company may appeal to the Labor Inspectorate requesting resolution of the dispute according to the applicable law, particularly Article 18 of Law 4808/2021.

### ### METHODS OF IMMEDIATE AND URGENT INFORMATION AND COMMUNICATION WITH COMPETENT AUTHORITIES

- **Contact the Labor Inspectorate**:

Through the citizen service line 1555.

- **Contact the Ombudsman**:

Via the website [www.synigoros.gr](http://www.synigoros.gr) or by phone at 2131306600.

- **Contact the SOS Hotline 15900**:

The SOS Hotline 15900 operates 24/7 and provides useful information on issues of violence and harassment, as well as domestic violence, and details on the country's counseling centers that women victims of gender-based or domestic violence and multiple discrimination can turn to for psychological, social, legal, and employment support. It also offers immediate and urgent psychological support and counseling to women victims of gender-based violence and harassment and to domestic violence victims in urgent need or crisis.

### ### E) Appointment of a Reference Person ("Link") for Guiding and Informing Employees Regarding the Prevention and Handling of Violence and Harassment at Work

In the Company, Ms. Ourania Kalyva is designated as the reference person (hereinafter "Link"), responsible for guiding and informing employees on the prevention and handling of

incidents of violence and harassment at work. In fulfilling her role, the Link provides information and guidance regarding the measures implemented by the Company for the prevention and handling of incidents of violence and harassment, the rights and obligations of both employees and the Company for the prevention, avoidance, and handling of such incidents. Additionally, she offers personalized information and guidance to any interested party on specific incidents of violence or harassment, providing clear and necessary information and guidance for the effective handling of the incident, the protection of the affected person, and the resolution and elimination of the offense for the future.

The above-mentioned Link is bound by the principles of confidentiality, trust, and the protection of personal data of every involved person, which come to her knowledge during the exercise of her role.

### ### F) Protection of Employment and Support of Employees Who Are Victims of Domestic Violence, Using All Appropriate Means or Reasonable Adjustments as Far as Possible

The Company is committed to protecting the employment and applying all appropriate measures recommended by the occupational physician or other competent administrative authority for the support and restoration of employees who are victims of violence or harassment at work, as well as victims of domestic violence, including reasonable adjustments at work.

### ### VI. INTERNAL PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS

\*\*A) The internal procedure for receiving and examining complaints aims at the immediate handling of the incident of violence and harassment, collecting evidence for the investigation and resolution of the offense, and protecting the affected person.\*\*

This process is suitable mainly when:

- There is a claim by an employee, client, or partner that they have experienced an incident of violence or harassment, know the procedure, recognize/consider it useful, and wish to follow it.
- The person reporting or complaining about an incident of violence or harassment and the accused have continuous or frequent contact, and therefore, the reporting or complaining person wishes the incident to be handled promptly, confidentially, and discreetly to restore a positive, harmonious relationship between them.

- The incident constituting violence or harassment is of a less serious nature, and the reporting or complaining person expects the offense to cease without needing to resort to other bodies and/or authorities.

**\*\*The internal procedure should:\*\***

1. Be immediate, easily accessible, clear, well-defined, and understandable.
2. Be objective and respect the personal data and personality of the involved parties.
3. Have clear stages.
4. Not victimize the reporting or complaining person and potential witnesses.
5. Have a timeframe within which it should be completed.
6. Not replace in any way the official procedure for submitting and examining complaints of violence or harassment, which is the responsibility of the competent authorities and is regulated by the applicable legislation.
7. Uphold the principles of confidentiality and trust.

#### **### B) Communication Channels - Responsible Persons**

1. The responsible person (hereinafter "Link") for receiving, examining, and managing complaints or grievances from affected individuals regarding behaviors of violence or harassment is Ms. Ourania Kalyva.
2. Within the scope of their role, the above-mentioned responsible person:
  - Informs the affected individual about their rights and the possibility, at any stage of the procedure followed within the Company, to also file a complaint and pursue any legal means with the competent administrative authorities within their jurisdiction (Labor Inspectorate and Ombudsman) as well as with the competent judicial authorities.
  - Investigates and examines the complaint, gathering any suitable and necessary evidence impartially while protecting the confidentiality and personal data of the affected and any involved individuals.
  - Provides the competent administrative and other authorities with any information requested within their jurisdiction to investigate the incident.
  - Is bound by the principles of confidentiality, trust, and the protection of personal data of every involved person, which come to their knowledge during the exercise of their role.

- Has access to Company records, audiovisual material collected by the Company, and other suitable means for collecting information and evidence during the examination of the report/complaint and for verifying the allegations.

3. While performing their duties as Link, the individual is protected from retaliation as outlined in this Policy for the affected and other involved persons.

### ### C) Internal Procedure - Steps:

1. Any affected person experiencing an incident of violence or harassment, as well as any third party aware of such an incident or attempt, can report it to the human resources department through the following means:

- In person at the office by appointment, between 10:00 AM and 4:00 PM.
- By email to [hrc@mideast.gr](mailto:hrc@mideast.gr).
- By phone at 2112118738 or 6978125295.

2. Following immediate consultation between the Link and the affected individual, the following steps are taken:

- The person reporting/complaining is asked to provide an oral and then a written account of the incidents constituting harassment or sexual harassment.

- The reporting/complaining person is asked to identify any witnesses or submit any necessary or suitable means to substantiate the incident.

- Witnesses are requested to provide a written report on the alleged incident of harassment or sexual harassment.

- The accused person is informed of the report/complaint and asked to provide their view/explanation orally and then in writing, submitting any necessary or suitable means to substantiate their account.

- The accused person has the right to call witnesses who can provide written or oral accounts of the incident.

- If the accused person admits to the complaint, the manner of acceptance will be evaluated.

- Consequences for employees and other personnel will be proportional to the severity of the offenses within the framework defined by law. This Regulation does not in any way replace the applicable legislative provisions.

- False complainants will face appropriate consequences for their false complaint and the disruption caused to the smooth operation of the Company.

- If it is decided or necessary to pursue an external procedure, management, in cooperation with the Legal Department, will inform the affected person of the necessary steps. The above actions will also be considered.

**\*\*If you are an employee:\*\***

- Inform the Link immediately.

- Submit a written complaint or grievance following the procedure outlined in this Policy, specifying what happened, when, and where.

### ### D) DUTIES AND OBLIGATIONS OF THE COMPANY

- During the investigation and examination of complaints, the Company and the Link are bound by the principles of impartiality, confidentiality, and the protection of personal data of the affected individuals, the accused, and any other involved persons.

- The investigation period lasts from three (3) to seven (7) working days after the complaint is made.

- The Company is also obliged to inform the victim that non-disclosure, i.e., not disclosing their details, may hinder the overall process. However, the Company will respect this wish of the victim to the extent possible and protect their personal data to the extent permitted by law.

- If deemed necessary, the management will refer the case to the competent authorities of the Greek State and Justice, without neglecting internal procedures.

- The Company is prohibited from terminating or otherwise ending the legal relationship on which the employment is based, as well as any other adverse treatment of a person who reports or complains or is involved as a witness in the report or complaint of an incident of violence or harassment, in retaliation or retribution for the report or complaint of the incident. The Company is obliged to adhere to the obligation of non-retaliation according to Article 13 of Law 4808/2021 and the provisions of labor law.

### ### E) Consequences of Violation During the Internal Investigation Process

1. When the violation of the prohibition of violence and harassment comes from a person exercising managerial rights or representing the Company against an employee or with any employment relationship, at the start, during, and upon termination of employment, such

behavior is considered a violation of labor law, and the Company faces the administrative sanctions of Article 19 of Law 4808/2021.

2. When an employee or someone with another employment relationship violates the prohibition of violence and harassment against another person (employee, colleague, client, partner, third party), they are subject to any appropriate and proportional measures, as the case may be, to prevent recurrence and remove the offense and protect the affected person. For example, the above-mentioned employee may be subject to compliance recommendations, change of position, working hours, place, or manner of providing work, or even termination of the employment or cooperation relationship, as a last resort to restore workplace peace and protect the affected person.

### ### VII. HOW CAN I SUPPORT A PERSON WHO HAS EXPERIENCED HARASSMENT OR SEXUAL HARASSMENT?

When an individual experiences harassment or sexual harassment, the people they choose to confide in play a crucial role. A relative, friend, colleague, partner, etc., who offers support can be a significant source of assistance and help.

Individuals who have experienced harassment or sexual harassment often find it difficult to talk about it. We know that many victims fear they won't be believed, that they will be blamed, or that people will ignore or downplay the seriousness of the situation.

The six steps outlined below will help address these fears and support victims of harassment or sexual harassment:

1. Listen to the victim.
2. Help the victim determine what options they have.
3. Never blame the victim.
4. Ask the victim before taking any action based on what they have told you.
5. Be aware of your own emotions and seek help for yourself if needed.

### ### VIII. EPILOGUE

Employees of the Company must, as soon as they become aware of or are informed about any incident of harassment or sexual harassment, immediately inform the Company's Management or the Link. The Company will protect the identity of these individuals and investigate any report within a reasonable timeframe and in the best possible manner, in accordance with this Policy and the applicable legislation.

### ### IX. FINAL PROVISIONS

It is noted that:

- External partners and employees of the Company, in any form of employment relationship, must be informed of and accept this Policy in writing before or during the signing of a contract with the Company, with the Company's diligence.
- This Policy is the result of consultation between the Company and its staff.
- The draft of this Policy was posted in the workplace for the employees' awareness, and their opinions were taken into account in accordance with Article 11 of Law 4808/2021.

This Policy is valid until it is revised in accordance with applicable law.

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