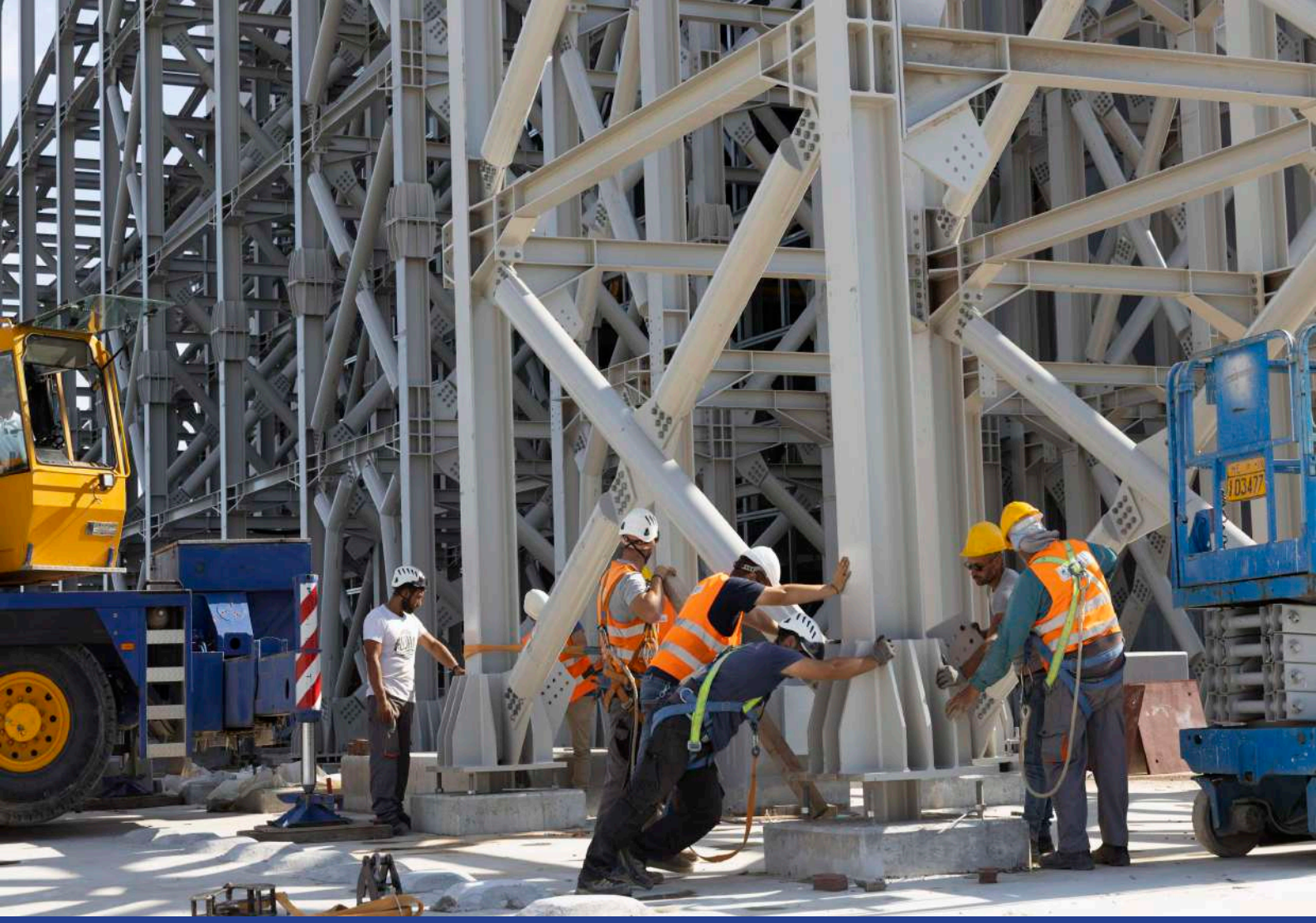


# POLICY FOR THE PREVENTION AND HANDLING OF VIOLENCE AND HARASSMENT AT WORK

K.LIAROMATIS

STRUCTURAL STEELWORK

# POLICY FOR THE PREVENTION AND HANDLING OF VIOLENCE AND HARASSMENT AT WORK

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# POLICY FOR THE PREVENTION AND HANDLING OF VIOLENCE AND HARASSMENT AT WORK

## Table of Contents

1. Statement of Principles and Purpose ..... 3
2. Scope of Application and Definitions ..... 3
3. Risk Assessment: Violence and Harassment ..... 3
4. Prevention, Control, Response and Monitoring Measures ..... 3
5. Employee Information and Awareness ..... 4
6. Rights and Obligations ..... 4
7. Reference Person (Liaison) ..... 4
8. Support for Victims of Domestic Violence ..... 4
9. Secure Reporting Channels and Designated Persons ..... 5
10. Submission of Complaints ..... 5
11. Impartial Investigation, Confidentiality and Data Protection ..... 5
12. Prohibition of Retaliation ..... 6
13. Consequences of Substantiated Violations ..... 6
14. Cooperation with Competent Authorities ..... 6
15. Adoption, Publication and Review ..... 6
16. Legal Sources ..... 7

# POLICY FOR THE PREVENTION AND HANDLING OF VIOLENCE AND HARASSMENT AT WORK

## 1. Statement of Principles and Purpose

**K. LIAROMATIS S.A.** is committed to providing a safe working environment that respects human dignity, equal treatment and the personal rights of everyone. The Company declares zero tolerance for all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, regardless of the position or capacity of the person involved. The Company takes measures to prevent such conduct, protect those affected and meaningfully investigate every report, without prejudging any person.

## 2. Scope of Application and Definitions

This Policy covers persons working under any form of employment, contract workers, employees of third-party providers or temporary employment agencies, seconded workers, trainees, apprentices, volunteers, job applicants and former employees in respect of work-related incidents, pursuant to Article 59 of Presidential Decree 62/2025. It applies at production facilities and offices, shared spaces, during travel and business trips, at construction sites, at customer premises and professional events, and to telephone, electronic and digital communications connected with work. Violence and harassment means behaviours, practices or threats thereof, whether occurring once or repeatedly, which aim at, result in or are likely to result in physical, psychological, sexual or economic harm. This includes gender-based violence and sexual harassment. The lawful, documented and proportionate exercise of managerial authority does not automatically constitute harassment.

## 3. Risk Assessment: Violence and Harassment

The Company includes psychosocial risks in its written occupational risk assessment and reviews the measures when work activities or organisational conditions change or incidents occur. The following is an initial framework for identifying risks and does not replace an actual assessment by job role.

- Production, welding, sandblasting/painting, operation of equipment and overhead cranes: tension under time pressure, verbal aggression, threats or intimidation in high-risk areas.
- Construction sites, installation work and travel: cooperation with contractors, subcontractors and customer personnel; isolation of workers and difficulty accessing a secure reporting channel.
- Offices, management, technical and commercial staff: abuse of hierarchical authority, offensive remarks, online harassment or unwanted personal advances.
- Specific groups or circumstances: new recruits, apprentices, night or lone shifts, third-party workers, people with increased dependence on supervisors or communication barriers

## 4. Prevention, Control, Response and Monitoring Measures

- Express prohibition of offensive, threatening, sexist, racist or unwanted sexual behaviour, whether in person or through digital means.
- Training of supervisors, shift leaders, foremen and project managers in early incident identification, deescalation and safe reporting.
- Clear communication to subcontractors, suppliers, customers and other third parties of the rules of conduct in shared working environments.
- Easy and secure access to a reference person and an alternative reporting channel, including where the immediate supervisor is involved.
- Immediate risk assessment and, where necessary, temporary separation from dangerous contact, without adverse treatment of the affected person.

- Periodic, at least annual, assessment of complaints in anonymous aggregated form and revision of preventive measures.

## 5. Employee Information and Awareness

The Company communicates this Policy to new employees upon recruitment and to all existing employees, displays it in prominent locations and on the corporate website and provides information in an accessible manner. It organises refresher briefings and targeted training where necessary. New recruits, supervisors and construction-site personnel receive specific information about complaint channels.

## 6. Rights and Obligations

Every employee has the right to work free from violence or harassment, to report an incident or testify as a witness without retaliation, and to be informed of the available procedures. Every employee must respect others, refrain from prohibited conduct and cooperate in good faith with investigations while maintaining confidentiality. Management and executives must act without delay, must not downplay complaints, must protect the persons involved and must apply proportionate measures. The affected person may, simultaneously or independently, apply to the Labour Inspectorate, the Greek Ombudsman (within its remit) or the courts.
Useful contacts:

- Labour Inspectorate / 1555
- Greek Ombudsman: www.synigoros.gr
- SOS Helpline for women experiencing gender-based violence: 15900
- In an immediate emergency: 112 or 100

## 7. Reference Person (Liaison)

The following person is designated as the reference person:

| | |
|---|---|
| Full Name | **Avgeris Konstantinos** |
| Secure email address | augerisk@liaromatis.gr |
| Telephone | +30 2610 647 491 / + 30 694 88 07 969 |

Alternative channel if the above person is the subject of a complaint or is unable to act:

| | |
|---|---|
| Person responsible for receiving and examining complaints | **Dimitra Liaromati** |
| Secure email address | liaromatid@liaromatis.gr. |
| Telephone | +30 2610 647 491 / + 30 693 74 72 627 |

The above email addresses are individual accounts and access to them is permitted exclusively to their respective holders, who have been designated as persons responsible for receiving and handling complaints. Incoming messages and attachments are treated as strictly confidential and are not disclosed to unauthorised persons. Information is processed and, where necessary, disclosed only to the extent required for the impartial investigation of incidents, protection of the persons involved and compliance with applicable personal data protection legislation.

## 8. Support for Victims of Domestic Violence

For employees experiencing domestic violence, the Company considers, upon a confidential request and on a case-by-case basis, flexible working hours, a change in point of contact, secure communications, leave or other

appropriate accommodations in accordance with the law and operational possibilities. The aim is to protect employment, safety and dignity without requiring unnecessary disclosure of sensitive information.

## 9. Secure Reporting Channels and Designated Persons

| | |
|---|---|
| Person responsible for receiving and examining complaints | **Dimitra Liaromati** |
| Secure email address: | reports@liaromatis.gr |
| Telephonee | +30 2610 647 491 / + 30 693 74 72 627 |
| Opportunity for a private meeting | A private meeting with the designated person responsible for receiving and handling complaints may be arranged by prior agreement during a break or at the end of the working day, in a suitable location that ensures privacy and confidentiality. The meeting may also take place during working hours by prior agreement, without adverse consequences for the employee. |

Alternative channel if the above person is the subject of a complaint or is unable to act:

| | |
|---|---|
| Full name | **Konstantinos Avgeris** |
| Ασφαλής διεύθυνση email: | augerisk@liaromatis.gr. |
| Telephone | +30 2610 647 491 / + 30 694 88 07 969 |

A report may be submitted verbally or in writing by the affected person or by any person with knowledge of an incident. Anonymous reports are assessed to the extent that they can be investigated; the Company does not guarantee that every anonymous report will provide sufficient information for full verification. The reference person is responsible for informing and guiding employees regarding the prevention and handling of violence and harassment at work, and for providing information about their rights and the available complaint procedures, regardless of whether a report or complaint has previously been submitted.

## 10. Submission of Complaints

Complaints may be submitted in writing or verbally through the Company's designated communication channels. A complaint should describe the facts as clearly and accurately as possible, indicating, for example, the date, time and location of the incident, the nature and description of the behaviour, the persons involved, any witnesses, and any available evidence or information that may assist the investigation. In the case of repeated incidents, it is recommended that the frequency and duration be indicated. The absence of some of the above details does not prevent submission or examination of a complaint. The Company may request additional information if deemed necessary, with due regard for confidentiality and the protection of personal data.
All complaints are treated seriously, impartially and confidentially, in accordance with this Policy.

## 11. Impartial Investigation, Confidentiality and Data Protection

The Company receives every report without obstruction and acts promptly. The internal procedure is as follows:

1. Registration: secure recording of the date, essential facts and available evidence; acknowledgement of receipt generally within two working days (internal target).
2. Immediate protection: assessment of risk and, where necessary, appropriate, proportionate interim measures, without prejudging responsibility.

3. Impartiality: appointment of an investigator without a personal interest; each person involved is given an opportunity to present their views, without mandatory confrontation.
4. Examination: interviews, documents and lawfully available evidence, with access limited to what is strictly necessary; unauthorised access to private communications is prohibited.
5. Findings: a documented assessment and recommendation to a competent, uninvolved decision-making body, with the aim of completion generally within 20 working days, unless the complexity of the case requires an extension, in which case the parties will be informed.
6. Decision and follow-up: implementation of measures, informing the parties to the necessary extent, and follow-up checks for recurrence or retaliation.
7. Records are stored in a file with restricted access and retained only for as long as required by a specific lawful need and an approved records-retention schedule, in accordance with the GDPR and Law 4624/2019. Information provided to the parties does not include unnecessary personal data of others.

## 12. Prohibition of Retaliation

Any adverse treatment, threat, dismissal or other detrimental change in response to a complaint made in good faith, testimony, provision of information or exercise of a lawful right is prohibited. A complaint that is not substantiated is not, for that reason alone, considered to have been made in bad faith. Any allegations of retaliation are investigated separately and promptly, in accordance with Article 66 of Presidential Decree 62/2025.

## 13. Consequences of Substantiated Violations

Where a violation is established, appropriate and proportionate measures are taken according to its seriousness and the applicable legal and contractual framework: a written recommendation to comply, training, reassignment of duties or position, changes to working hours or place of work, exclusion of a third party from premises or cooperation and, where legally justified, termination of the employment relationship or cooperation. The rights of all persons involved and the prohibition of abusive exercise of rights are respected.

## 14. Cooperation with Competent Authorities

The Company cooperates with the competent administrative and judicial authorities and provides information lawfully requested, ensuring confidentiality, restricted access and personal data protection. The internal procedure does not restrict the right to submit an external complaint.

## 15. Adoption, Publication and Review

This Policy is adopted by K. LIAROMATIS S.A. in accordance with the procedures provided for in Article 2 of Ministerial Decision 95/2026 (Government Gazette B’ 1/08.01.2026), following completion of the consultation or employee information procedure required in the circumstances. Any change to the designated contact persons is communicated immediately. The Policy is reviewed at least annually or earlier if necessary. Note: This Policy does not replace the occupational risk assessment, the Internal Work Regulations, any applicable collective arrangements or rights under current legislation.

## 16. Legal Sources

1. Ministerial Decision 95/2026 (Government Gazette B' 1/08.01.2026): Model policy for combating violence and harassment and for handling internal complaints under Article 62 of the Labour Law Code (Presidential Decree 62/2025, Government Gazette A' 121), together with relevant guidance for obliged entities, pursuant to the authorisation in Article 69(1) of the Labour Law Code.
2. Presidential Decree 62/2025 (Government Gazette A' 121/11.07.2025): Labour Law Code, Articles 58-69, 507-508, 533 and 537.
3. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
4. Law 4624/2019 (Government Gazette A' 137/29.08.2019): Hellenic Data Protection Authority; measures implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data; transposition into national law of Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016; and other provisions.