



PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE POLICY

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1. INTRODUCTION: BASIC PRINCIPLES AND COMMITMENTS

- 1.1. The main principle and commitment of the company "IATRIKO ATHINON E.A.E." (ATHENS MEDICAL CENTER S.A.) and its affiliated companies that make up the "IATRIKO ATHINON" Group of Companies (hereinafter referred to as the "Company" or "Group") is respect for human rights, ensuring the right of all employees to pursue their material progress and intellectual development with freedom, dignity, financial security, and equal opportunities, and combating any form of discrimination, as specifically reflected in the Human Rights Policy established and implemented by the Company.
- 1.2. The "IATRIKO ATHINON Group" recognises and highlights through this Policy the importance of a work culture based on mutual respect and human dignity for the prevention of violence and harassment in the workplace, in accordance with the provisions of international, European, and Greek law (Convention 190 of the International Labour Organization on the elimination of violence and harassment in the world of work, Convention 187 of the International Labour Organization on the Framework for the Promotion of Safety and Health at Work, Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance, Law 3896/2010, Law 4443/2016, Law 4808/2021, as amended by Law 5053/2023, Ministerial Decision 82063/2021).

1.3. Declaration of zero tolerance for all forms of violence and harassment at work

The "IATRIKO ATHINON Group" expressly and categorically states that:

- a) Any form of violence and harassment that occurs during work, is related to work, or arises from work, including gender-based violence and harassment and sexual harassment, is prohibited.
- b) Is committed to implementing preventive measures against all forms of violence and harassment in the workplace, as identified through risk assessment processes conducted in accordance with the current Occupational Risk Assessment study.
- c) Ensures that all reports or complaints concerning workplace violence or harassment are received through accessible communication channels and are handled promptly, impartially, and confidentially, with full respect for human dignity.
- d) Recognises the impact of domestic violence and, to the extent reasonably possible and after relevant information has been provided, takes measures to mitigate its impact in the workplace.
- e) Ensures that workers have the right to withdraw from a work situation where they have reasonable grounds to believe that there is an imminent and serious risk to life, health, or safety due to violence and harassment, without suffering retaliation or other unjustified consequences.
- f) Takes all appropriate measures to prevent further victimization of the affected person.

2. PURPOSE AND SCOPE

- 2.1. The purpose of this Policy is to establish a framework and procedures for preventing, addressing, and combating forms of violent and harassing behavior, and to create a work environment that respects, promotes, and ensures every person's right to a workplace free from violence and harassment.
- 2.2. This Policy includes and covers all employees working at all the companies of the Group, regardless of their employment status,

including those employed on a project contract, independent services, salaried assignment, those employed through third-party service providers, as well as individuals attending training, including trainees and apprentices, volunteers, employees whose employment relationship has ended, and individuals seeking employment.

- 2.3.** Attached to this Policy as a Special Annex is a Sample Prevention and Combating of Violence and Harassment in the Workplace Policy for each Group Clinic, attached to the Work Regulations of each Clinic of the Group as mandatory content thereof in accordance with Article 11 of Law 4808/2021.

3. DEFINITIONS

3.1. In accordance with the provisions of the law:

- a) **"Violence and harassment"** means forms of behavior, acts, practices, or threats thereof, which aim at, lead to, or may lead to physical, psychological, sexual, or economic harm, whether they occur individually or repeatedly.
- b) **"Harassment"** means any form of behavior that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether it constitutes a form of discrimination, and includes harassment based on gender or other grounds of discrimination. degrading, or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or other grounds of discrimination.
- c) **"Gender-based harassment"** refers to any form of behavior related to a person's gender that has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- d) **"Sexual harassment"** is defined in particular as any form of unwanted verbal, psychological, or physical conduct of a sexual nature that results in the violation of the individual's personality, as well as forms of behavior related to the sexual orientation, expression, identity, or gender characteristics of the person.

3.2. Indicative forms of violent and harassing behavior:

- Abusive, offensive comments (verbal violence), e.g., aggressive teasing, inappropriate jokes, sexual innuendo, disparaging remarks
- Physical violence (pushing, pinching, violent contact)
- Harassment with sounds, whistling, use of inappropriate words, hand or eye signals (e.g., inappropriate staring at the body or parts of the body)
- Belittling, humiliating, offensive behavior (e.g., comments about appearance, body type, manner of speaking)
- Threats of any kind
- Workplace bullying (e.g., belittling work performance, sarcasm, spreading false rumors, overloading with work, assigning belittling tasks that are not commensurate with the employee's abilities)
- Harassment through gestures (e.g., touching the body, hugging, sexual gestures)
- Harassment through inappropriate/obscene phone calls, messages, posts (e.g., sharing derogatory photos, texts, images, cartoons, images that degrade or are intended to degrade or embarrass another person)
- Abuse of a dominant position at work
- In general, any offensive, malicious, or intimidating behavior involving physical contact, verbal or non-verbal, abuse of personal power that results in the violation and insult of a person's dignity by creating a hostile, intimidating, undermining, humiliating, or threatening environment.

4. POSSIBLE RISKS OF VIOLENCE AND HARASSMENT AT WORK

4.1 Forms of violent and harassing behavior against individuals may occur in particular:

- a) in the workplace, including public and private areas and spaces where the employee performs work, receives remuneration, takes breaks, in particular for rest or meals, in personal hygiene and care areas, changing rooms or accommodation provided by the Company,
- b) during commutes to and from work, other travel, trips, training, as well as events and social activities related to work, and
- c) during work-related communications, including those carried out through information and communication technologies.

5. POLICIES AND MEASURES WITHIN THE GROUP TO COMBAT VIOLENCE AND HARASSMENT AT WORK

5.1. In order to combat violent and harassing behavior at work, the Company, based on the Law and in accordance with this Policy and the Reporting Policy, is required to:

- a) Appoint a reporting officer ("liaison officer" - Responsible for Receiving and Monitoring Reports, "Y.P.P.A") at Company/Group level, responsible for guiding and informing employees on the prevention and handling of violence and harassment at work.
- b) Receive, through the Report Receipt and Monitoring Officer, any complaint or relevant report, demonstrating zero tolerance for violence and harassment, and handle it confidentially and in a manner that respects human dignity.
- c) Not to obstruct the receipt, investigation, and handling of such complaints or reports.
- d) To provide assistance and access to any competent public, administrative, or judicial authority during the investigation of such incidents or behavior, if requested by them.
- e) Provide employees with information on the potential risks of violence and harassment in the workplace, as well as information on prevention and protection measures, including the obligations and rights of employees and the Company in such circumstances.
- f) Provide easily accessible information on the procedures in place at Company/Group level for reporting and dealing with such forms of behaviour, as well as the contact details of the competent administrative and judicial authorities, in accordance with the provisions in force.
- g) Take measures to protect the employment and support employees who are victims of domestic violence, as far as possible, by any appropriate means or reasonable accommodation.

5.2. In order to prevent violence and harassment at work, the Company takes all necessary measures to inform and raise awareness among its employees, including, but not limited to:

- Posting this Policy on the intranet and in all Company workplaces
- Training and education of employees on issues related to violence and harassment at work (through seminars, informational messages, etc.)
- Designing safety and protection at the workplace (avoiding employment in isolated areas, adequate lighting of the surrounding area, etc.)

5.3. In order to protect the persons affected and prevent the recurrence of violent and harassing behavior at work, **the Company** takes appropriate measures after investigating each such incident, and may impose work and disciplinary sanctions on persons who violate the prohibition of violent and harassing behavior, depending on the severity of the act, including, but not limited to:

- a recommendation to comply,
- a change of position, working hours, place of work, or manner of work,
- transfer to another company within the Group,
- deprivation of position of responsibility and related benefits,
- the imposition of disciplinary sanctions
- termination of the employment/work/cooperation contract.

6. RIGHTS AND PROTECTION OF AFFECTED PERSONS

6.1. Any person affected by an incident of violence and harassment against them, even if the relationship in which the incident or behavior allegedly occurred has ended, has the right, in addition to judicial protection:

- Submit an anonymous or named, written or verbal report/complaint to the Company's Report Receipt and Monitoring Officer, who performs the duties and responsibilities of the "Reporting Officer/Liaison," as provided for by Law 4808/2021, using the procedure described below and in accordance with the Company's Whistleblowing Policy
- To appeal to the Independent Labor Inspectorate and the Ombudsman as the body promoting and supervising the principle of equal treatment.
- To leave the workplace for a reasonable period of time, without loss of pay or other adverse consequences, if he reasonably believes that there is an imminent serious risk to his life, health, or safety, especially when the employer is the perpetrator of such behavior or when they fail to take the necessary measures to restore peace in the workplace, or when such measures are not sufficient to stop the violent and harassing behavior. In this case, the person leaving is required to inform the employer in writing in advance, stating the incident of violence and harassment and the circumstances justifying his belief that there is a serious risk to his life, health or safety. If the danger does not exist or has ceased to exist and the affected person refuses to return to the workplace, the employer may appeal to the Labor Inspectorate with a request to resolve the dispute.
- To claim full compensation covering the actual and consequential damage suffered by the injured party, as well as moral damage.

6.2. It is prohibited and invalid to terminate or in any way dissolve the legal relationship on which the employment is based, as well as any other unfavorable treatment of the employee, if it constitutes retaliatory behavior or countermeasures within the meaning of Article 14 of Law 3896/2010¹ for incidents of violence and harassment under Article 4.

¹ Article 14 of Law 3896/2010: "It is prohibited to terminate or in any way dissolve the employment relationship and the civil service relationship, as well as any other unfavorable treatment:

a) on grounds of sex or family status,

b) when it constitutes retaliatory behavior by the employer due to the employee's refusal to submit to sexual or other harassment against him/her, in accordance with the definitions of Article 2, c) when it is a reaction by the employer or person responsible for vocational training to a protest, complaint, testimony, or any other action by a person undergoing vocational training, or their representative, at the workplace or vocational training site, before a court or other authority, which is relevant to the application of this law.

6.3. When the aggrieved person claims that there is violence and harassment at work, the burden of proof in court or before another competent authority that such circumstances did not occur lies with the accused. This provision does not apply in criminal proceedings.

7. HANDLING OF COMPLAINTS

7.1. Reports/complaints of any inappropriate behavior that constitutes violence and harassment at work should always be made in good faith, within a reasonable period of time, which cannot exceed six (6) months from the time the specific behavior took place.

Specifically, the report should include:

- a) The name of the person (persons) who committed the offense
- b) The specific incident that constitutes inappropriate/unethical behavior, with reference to the place and time it occurred and/or other available information.

The report/complaint may be submitted:

- a) Using the online platform at the following address:

<https://app.myethos.eu/mailbox/d979fa28-49d6-439f-a52e-dfb7306f23fb>

following the relevant instructions on the platform.

- b) Verbally, through a personal meeting with the Group's Report Receipt and Monitoring Officer – Y.P.P.A. (ERAKLIA PEPPA, tel. 6944 664 777, e-mail: yppa@iatriko.gr), which meeting must be scheduled within three (3) working days, following a relevant request by the reporter. In the event of impediment, absence, or expiration of the term of office of the Y.P.P.A., she shall be replaced by Ms. ELENI CHARALAMBAKI (lawyer), deputy_yppa@iatriko.gr

- c) in writing by sending an email to the following email address:

yppa@iatriko.gr

deputy_yppa@iatriko.gr

or alternatively to the email address: compliance@iatriko.gr

- d) in writing by sending a letter to the following address:

Delphon and Sarantaporou 1, Marousi, Attica,

Attn: Regulatory Compliance Officer / Reports Receipt and Monitoring Officer – ERAKLEIA PEPPA
marked "CONFIDENTIAL"

7.2. The management of submitted reports is carried out by the Report Management Committee (hereinafter referred to as the "Committee"), to which reports/complaints are forwarded by the Y.P.P.A. in accordance with the procedure described in the Group's Whistleblowing Policy.

7.2.1 Specifically, the Regulatory Compliance Officer performs the duties and responsibilities of the "Reporting Officer /Liaison," as provided for by Law 4808/2021, in this Policy and in the Policy for the prevention and combating of violence and harassment in the workplace of each Clinic of the Group, which constitute an Annex to the Staff Work Regulations of each Clinic.

Reports submitted on these issues are handled by a 5-member Committee, consisting of: a) the Report Receipt and Monitoring Officer, b) the Company's Legal Advisor, c) the General Manager of each Clinic, d) the Group's Human Resources Manager, and e) the Deputy Director or Head of the Human Resources Department of each Clinic.

7.2.2 In the other companies of the Group, the Committee for the management of reports of violence and harassment at work remains a three-member body consisting of: a) the Y.P.P.A., b) the Company's Legal Advisor, c) the Group's Human Resources Director.

8. CONTACT DETAILS OF THE COMPETENT PUBLIC AUTHORITIES

8.1. The competent public authorities for receiving and monitoring complaints of violence and harassment at work within the Company are:

1) LABOR INSPECTION BODY

Complaints hotline: 1555

Details of Regional Labor Relations Inspection Directorates here:

[List-of-Services-LABOR-INSPECTION-ISSUE-2023-10.pdf \(hli.gov.gr\)](#)

2) CITIZEN'S ADVOCATE

17 Chalkokondili Street, Athens 10432

Tel.: 213 1306 800

3) Immediate Psychological Support and Counselling Service for women victims of gender-based violence – SOS LINE 15900

The SOS 15900 hotline is a nationwide service that enables women victims of violence or third parties to immediately contact an agency that deals with gender-based violence.

The hotline is staffed by psychologists and sociologists who provide immediate assistance in emergency situations of violence on a 24-hour basis, 365 days a year.

At the same time, women can also communicate electronically via the following email address: sos15900@isotifa.gr.

More details about the principles and operation of the SOS 15900 hotline are available here: SOS 15900 Hotline Operating Regulations

197 - National Social Solidarity Center Hotline (for calls outside the prefecture, dial 210-197).

People of all ages can anonymously request assistance and receive information about specialized psychosocial support and social solidarity services 24 hours a day, 365 days a year.

The Policy, in its current revised version, was approved by the Company's Board of Directors on May 12, 2025 (Minutes 891) and is reviewed upon recommendation by the Regulatory Compliance Unit whenever necessary.

ANNEX I:

Sample PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE POLICY of each Clinic of the Group, attached to the Work Regulations of each Clinic of the Group as mandatory content thereof in accordance with Article 11 of Law 4808/2021

PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE POLICY OF THE
PRIVATE CLINIC (Clinic headquarters) OF "IATRIKO ATHINON E.A.E."

APPENDIX TO THE APPROVED WORK REGULATION WORK REGULATION

COMPANY: IATRIKO ATHINON E.A.E.

OPERATION: PRIVATE GENERAL CLINIC OF "IATRIKO ATHINON E.A.E. (5-7 Distomou Street, Marousi)

LEGAL REPRESENTATIVE DETAILS:

SURNAME:

FIRST NAME:

FATHER'S NAME:

TAX ID NUMBER:

TAX OFFICE:

RESIDENCE ADDRESS:

POSTAL CODE:

Certified by:

The Private General Clinic ... of "IATRIKO ATHINON E.A.E." complies with all measures and obligations relating to the implementation of the provisions of Part II of Law 4808/2021 on the prevention and combating of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

In the Occupational Risk Assessment of paragraph 1 of Article 43 of the Code of Laws on the Health and Safety of Workers (Law 3850/2010) that employers are required to comply with, the risks associated with violence, harassment, and other psychosocial risks have been identified and added, taking into account, among other things, any inherent risk arising from the nature of the activity (e.g., contact with the public), the job position, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks relating to specific groups of workers (such as night workers, new recruits). The section or annex of the above Occupational Risk Assessment concerning the risks of violence and harassment, as well as the corresponding preventive measures, shall also be communicated to employees.

Policies for combating violence and harassment within the
private general clinicof "IATRIKO ATHINON E.A.E."

Violence and harassment, including sexual harassment and all forms of discrimination, and gender-based harassment in the workplace are prohibited by a network of provisions under international, European, EU, and Greek law, including Law 4808/2021, Government Gazette A 101/19.6.2021, which ratified International Labor Convention 190 (Part I, Article 1) and established its implementing provisions (Part II, Articles 2-23), Law 3896/2010 and Law 4443/2016, as applicable.

The present internal policies of the Private Clinic ... of "IATRIKO ATHINON E.A.E." (hereinafter referred to as "Private Clinic") for combating violence and harassment and managing internal complaints are adopted in accordance with Articles 9, 10, and 11 of Law 4808/2021 in conjunction with the provisions of Law 4990/2022. Their purpose is to contribute to the creation of a working environment that respects, promotes, and ensures the right of every person to work without violence and harassment.

I. DEFINITIONS/SCOPE OF APPLICATION

1. For the purposes of this policy, in accordance with the provisions of Laws 3896/2010, 4443/2016, and 4808/2021:

- "Violence and harassment" refers to forms of behavior, actions, practices, or threats thereof, which aim at, lead to, or may lead to physical, psychological, sexual, or economic harm, whether occurring in a single instance or repeatedly.
- "Harassment" means any form of behavior that has the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating, or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or other grounds of discrimination.
- "Sexual harassment" means any form of unwanted² verbal, non-verbal, or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular by creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- "Gender-based harassment" refers to forms of behavior related to a person's gender (including gender expression, gender identity, or sex characteristics) that have the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- "Discrimination" means any form of discrimination as defined in Article 2 of Law 3896/2010 and Article 2 of Law 4443/2016.

Sexual harassment and gender-based harassment, in accordance with the provisions in force, constitute forms of violence and harassment at work in accordance with Part II of Law 4808/2021, while at the same time constituting distinct forms of prohibited discrimination on the grounds of gender or other characteristics of the employee protected by law.

For the sake of brevity, all of the above behaviors will hereinafter be referred to as "discrimination, violence, and harassment."

2. This policy applies to employees and workers, regardless of their contractual status, including those employed on a project basis, independent contractors, salaried employees, those employed through third-party service providers, as well as individuals attending training, including interns and apprentices, volunteers, employees whose employment relationship has ended, and individuals seeking employment. For the sake of brevity, all of the above persons will hereinafter be referred to as "workers."

3. For the purposes of this policy, the prohibition of any form of violent behavior and harassment against employees covers, in particular: (a) the workplace, including public and private areas and areas where the employee performs work, receives remuneration, takes breaks, in particular for rest or meals, in areas for personal hygiene and care, changing rooms or accommodation provided by the employer, (b) travel to and from work, other travel, trips, training, as well as events and social activities related to work, and (c) work-related communications, including those made through information and communication technologies, whether at the workplace or during teleworking or remote working. For the sake of brevity, all of the above cases will hereinafter be referred to as violence and harassment "at work."

II. POLICIES WITHIN THE PRIVATE CLINIC TO COMBAT VIOLENCE AND HARASSMENT - ZERO TOLERANCE FOR VIOLENCE AND HARASSMENT (Article 9 of Law 4808/2021)

1. The Private Clinic is committed to maintaining a work environment free from all forms of violence and harassment. No form of violence or harassment in the workplace is permissible or tolerated.

2. All employees, as well as persons exercising managerial authority or representing the Private Clinic, must refrain from any form of violence and harassment in the workplace.

² The unwanted nature of the behavior is what distinguishes sexual harassment from friendly behavior, which is welcome and mutual.

work, comply with this policy, and ensure that they behave with respect and dignity towards their colleagues and third parties with whom they come into contact in the course of their duties. In addition, supervisors, managers, and, in general, persons exercising managerial authority or representing the employer must ensure, to the best of their knowledge, that there is no violence or harassment in the work environment that falls within their area of responsibility.

3. Depending on the severity of the incident/harassment/violence that arises from the internal procedures of the Private Clinic, which has taken place to the detriment of the affected employee, the disciplinary penalties provided for in Article 15 of the Work Regulations shall apply, but in addition, the Private Clinic may take the following indicative but not exhaustive measures to deal with the reported incident:

- Change of job position
- Transfer
- Removal from position of responsibility and related benefits
- Dismissal

4. Upon the initial implementation of this policy and periodically thereafter, the Private Clinic organizes information and awareness-raising activities for its employees and executives on violence and harassment, particularly in the form of training seminars on the various forms and manifestations of violence and harassment, the rights and obligations of employees at all levels in the event of such incidents occurring or being reported or complained about, as well as the procedure for handling such complaints/reports. Employees at all levels are required to participate in these actions.

5. Employees have the right to report any incident of violence and harassment against them. In such cases, they can contact the reporting person ("Liaison") for advice and assistance and/or submit an internal complaint directly, if they wish.

6. "Contact Person" at the Private Clinic level, responsible for receiving complaints about incidents of violence and harassment at work and for guiding and informing employees on the prevention and handling of violence and harassment at work, is the Group's Report Receipt and Monitoring Officer (Y.P.P.A.) of the "Iatriko Athinon Group," or, in case of impediment, absence, or expiration of term, his/her deputy, acting in accordance with Law 4990/2022 and the corresponding Group Whistleblowing Policy, yppa@iatriko.gr, deputy_yppa@iatriko.gr

Complaints about incidents of violence and harassment at work can also be made using the online platform at the following address:

<https://app.myethos.eu/mailbox/d979fa28-49d6-439f-a52e-dfb7306f23fb>

or verbally through a personal meeting with the Group's Report Receipt and Monitoring Officer (Y.P.P.A.) (tel. 6944 664 777), which should be scheduled within three (3) working days, following a relevant request by the reporter.

The Private Clinic ensures that the "Association" receives appropriate training in the prevention of violence and harassment and the management of such reports/incidents, so that it can fulfill its role effectively.

7. Any employee who reports an incident of violence and harassment, provides information or assists in any way with the investigation of a complaint of violence and harassment (including the "Association" and the competent bodies for investigating complaints) shall not be subject to adverse treatment as a reprisal. Any person who falls within the scope of this policy and believes that they have suffered such retaliation must immediately report it to the "Association" (under II.6) or "the competent body" (under III.1). Anyone who imposes such retaliation is subject to the penalties set out in paragraph II.3.

8. Violence and harassment constitute not only a violation of the policies of the Private Clinic but also, under certain conditions, a criminal offense, which may also give rise to civil liability of the perpetrator towards the victim.

9. The Private Clinic takes special measures to protect employment and support employees who are victims of domestic violence, in accordance with paragraph 1(f) of Article 3 of Ministerial Decision 82063/2021, provided that the relevant supporting documents are submitted, providing victims, upon request by the victim of domestic violence, with: a) special leave of one (1) day with pay per incident on an annual basis to seek medical/forensic/social/legal assistance and recourse to the competent services and judicial authorities, and b) flexible working hours arrangements for up to one (1) week after such an incident on an annual basis.

III. POLICIES WITHIN THE PRIVATE CLINIC FOR THE MANAGEMENT OF INTERNAL COMPLAINTS (Article 10 of Law 4808/2021)

1. A five-member Committee, as defined in the Whistleblowing Policy, is responsible for handling complaints of violence and harassment, consisting of:

a) the Group's Report Receipt and Monitoring Officer (Y.P.P.A.) of the Iatriko Athinon Group, yppa@iatriko.gr (or his/her deputy, deputy_yppa@iatriko.gr)

b) the Legal Advisor of the "Iatriko Athinon" Group

c) the General Manager of the Private Clinic

d) the Human Resources Director of the "Iatriko Athinon" Group

e) the Deputy Director/Head of the Human Resources Department of the Clinic

2. Employees who have suffered violence and harassment, or those who have witnessed or become aware of such incidents in any way, may submit relevant complaints/reports to the competent body verbally or in writing, either by name or anonymously. If the complaint is verbal, the competent body will complete a verbal complaint receipt form based on what was reported verbally. In any case, all complaints, whether verbal or written, named or anonymous, are accepted and the competent body takes the appropriate action. Anonymity may limit the ability of the Private Clinic to investigate the complaint through its competent bodies.

3. The investigation of any complaint/report by the competent body must begin immediately after its receipt and be completed as soon as possible, and in any case within one month of its submission, and must be conducted in detail with impartiality, objectivity, sensitivity and in any case in compliance with the provisions of paragraph 1(e) of Article 3 of Ministerial Decision 82063/2021 in conjunction with the provisions of Law 4990/2022, as described in detail in the "Iatriko Athinon" Group's Whistleblowing Policy. The process of receiving and examining the complaint ensures the protection of the victim and respect for human dignity, in accordance with paragraph 1(b) of Article 2 of Ministerial Decision 82063/2021 in conjunction with the provisions of Law 4990/2022, as described in detail in the Medical Group of Athens' Reporting Policy.

Minutes of all hearings and investigations will be kept, and any evidence gathered in any form will be kept in a relevant file in accordance with the provisions of Law 4624/2019 in conjunction with the provisions of Law 4990/2022, as described in detail in the "Iatriko Athinon" Group's Whistleblowing Policy.

4. The Private Clinic will cooperate and provide all relevant information to the competent authorities upon request.

This policy is posted on the intranet, where all employees of the Private Clinic can read it.

IV. RIGHTS OF AFFECTED PARTIES

This Policy applies in parallel with the legislation in force for the protection of human dignity and does not affect the legal rights of each employee under civil and criminal law, or their rights to file a complaint with the competent supervisory authority.

The affected person has, indicatively but not exclusively, the following options:

a) the right to judicial protection

- b) the right to appeal, file a complaint, and request the resolution of a labor dispute by the Labor Inspectorate, within the scope of its legal powers
- c) reporting to the Ombudsman, within the scope of its legal powers
- d) complaint within the Private Clinic in accordance with the Complaint Management Policy, as well as regarding the rights and consequences of non-compliance in the context of the employment relationship, in accordance with Articles 12-15 of Law 4808/2021.

Contact details of the competent public authorities

- Ombudsman
17 Chalkokondili Street, Athens, Postal Code 104 32
E-mail: press@synigoros.gr
Tel: (+30) 213 1306 600
- Independent Labor Inspectorate
 - 1. Labor Relations:
 - Competent Department for the Inspection of Labor Relations
 - Address:
 - E-mail:
 - Tel:
 - 2. Occupational Safety & Health:
 - Competent Department for Occupational Safety and Health Inspection
 - Address
 - E-mail:
 - Tel:
- SEPE complaints hotline 1555 or online at:
<https://www.hli.gov.gr/odigies-ilektronikon-ypiresion/ergasiakes-scheseis-ilektronikes-ypiresies/anonymi-katangelia/>
- Citizen service hotline 1555
- E-mail: helpdesk@sepenet.gr
- Immediate psychological support and counseling service for women victims of gender-based violence SOS line 15900* of the General Secretariat for Equality and Human Rights of the Ministry of Social Cohesion and Family (Art. 2, paras. 3 and 4, Presidential Decree 77/2023, Government Gazette B 130/27.6.2023).

*** The SOS 15900 hotline is a nationwide service that enables women victims of violence or third parties to immediately contact an agency that deals with gender-based violence. The line is staffed by psychologists and sociologists who provide immediate assistance in emergency and urgent cases of violence on a 24-hour basis, 365 days a year.**

At the same time, women can also communicate electronically via the following email address:
sos15900@isotifa.gr.

More details on the principles and operation of the SOS 15900 helpline are available here: SOS 15900 Helpline Operating Regulations

197 - National Social Solidarity Center Helpline (for calls outside the prefecture 210-197).

People of all ages can anonymously request help and get info on specialized psychosocial support and social solidarity services 24 hours a day, 365 days a year.

The following constitutes the Whistleblowing Policy of Law 4990/2022, which accompanies the Policy on Violence and Harassment (Article 10, paragraph 2 of Law 4808/2021), which in no way affects the content and subject matter of these Work Regulations, which are to be ratified, together with the Annex on violence and harassment, to which the Whistleblowing Policy is attached for the information of employees.

ANNEX II: DOCUMENT HISTORY

Date of Issue / Revision	Issue Number	Details of Changes	Approval	Date
30-09-2021	1 st		Board of Directors No. 792	30-09-2021
20-02-2024	2 nd	Revision	Board of Directors No.	20-02-2024
30-05-2024	3 rd	Revision	Board of Directors No. 848	30-05-2024
12-5-2025	4 th	Revision	Board of Directors No. 891	12-5-2025

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