



WATER SCIENCE

## **POLICY FOR THE PREVENTION, COMBAT, AND HANDLING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE**

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### **1. Company Description and Commitment:**

The Single-Member Private Capital Company SNF HELLAS is based in Athens, specifically at 3 Eleftherias Street, P.C. 14564, Kifissia, Attica, and is a subsidiary of the organization SNF SA. The SNF SA organization, with 45 years of history, is the leading producer of polyacrylamide chemical polymers, holding 50% of the global production. It has 21 production facilities across Europe, America, Asia, and Australia, and maintains more than 70 subsidiaries worldwide.

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### **Commitment Against Violence and Harassment in the Workplace**

Integrity and respect for all individuals are of vital importance and are an integral part of our corporate environment. We have created a workplace in which the personality of every employee is valued, and equal opportunities for development and growth are provided. The respect and dignity of each individual employee are our immediate priority. The Company, demonstrating zero tolerance for incidents of violence and harassment in the workplace, adopts this policy in compliance with Articles 9 and 10 of Greek Law No. 4808/19.06.2021, which ratified the International Labour Convention 190/21.06.2021 of the International Labour Organization (ILO), concerning the elimination of violence and harassment in the world of work. The text of this convention is annexed in full to the law, and it shall hereafter apply alongside the above-mentioned Policies.

### **2. 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 individual to a world of work free from violence and harassment. The Company declares that it recognizes and respects the right of every employee to a workplace free from violence and harassment and that it does not tolerate any such behavior, in any form, from any person.

### **3. Scope of Application**

The scope of this policy includes all types of personnel associated with the Company:

- Under an employment contract (permanent or fixed-term, full-time or part-time),
- Under a project contract,
- Seconded personnel from an EU member state or third-country personnel,
- Under an independent service contract,
- Under an apprenticeship contract,
- Employed through third-party service providers,
- Job applicants,
- Individuals whose employment relationship with the company has ended.



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### **4. Prohibited Forms of Behavior - Definitions**

#### **Violence and Harassment**

These refer to forms of behavior, acts, practices, or threats thereof, intended to cause, lead to, or that may lead to physical, psychological, sexual, or economic harm, whether occurring once or repeatedly.

#### **Harassment**

This refers to forms of behavior that aim to or result in the violation of an individual's dignity and the creation of a threatening, hostile, degrading, humiliating, or aggressive environment, regardless of whether it constitutes a form of discrimination, and includes harassment based on gender or other grounds of discrimination.

#### **Harassment Based on Gender**

This refers to forms of behavior related to a person's gender, which aim to or result in the violation of that person's dignity and the creation of a threatening, hostile, degrading, humiliating, or aggressive environment. These forms of behavior include sexual harassment as defined by Law 3896/2010, as well as forms of behavior related to a person's sexual orientation, expression, identity, or gender characteristics.

#### **What Constitutes an Incident of Violence and Harassment**

Examples of behaviors that may occur include, but are not limited to, the following:

- Threatened or actual physical violence
- Bullying, oppression, persecution
- Aggressive or threatening behavior that reasonably causes fear in another person
- Verbal hostility
- Blatant threats
- Threats related to the position and working conditions
- Offensive comments or jokes targeting another person
- Arrogant, degrading, and belittling remarks
- Acts of retaliation
- Domestic violence carried over into the workplace
- Sexual comments, jokes, gestures
- Immoral or/and offensive remarks about gender or sexual orientation
- Intrusive questions about personal or sexual life
- Sexual innuendos
- Invitations for dates or sexual encounters
- Unwanted touching, whistling, caressing, kissing
- Persistent or lustful staring
- Sending messages of a romantic or sexual nature (via phone or email)

#### **What Does NOT Constitute an Incident of Violence and Harassment**

- Direct supervision of employees, including setting performance expectations
- Taking measures to correct performance, such as placing an employee on a performance improvement plan
- Assigning tasks and providing guidance on how and when they should be completed
- Requesting updates or progress reports on tasks
- Approval or denial of leave
- Requesting documentation for absence due to health reasons, in accordance with applicable regulations



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- Moral or financial reward for excellent performance
- Providing constructive feedback regarding work performance

### **Workplace**

- This refers to a broader spatial context in which incidents of violence and harassment may occur, specifically:
  - In the workplace, including public and private spaces and areas where the employee provides work, receives compensation, takes breaks, or rests, as well as in personal hygiene and care facilities.
  - During commuting to and from work, other travel, business trips, training, as well as events and social activities related to work.
  - During communications related to work, including those conducted via information and communication technologies (company emails and mobile phones).

### **Domestic Violence**

All acts of physical, sexual, psychological, or economic violence that occur within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners, and regardless of whether the perpetrator shared or previously shared the same residence with the victim.

Domestic violence that occurs in the workplace, such as physical violence, sexual harassment, and stalking by current or former partners, is a serious form of violence in the workplace. Acts of domestic violence, including stalking/monitoring, can also be committed by people within the same work environment with whom the victim has (or had in the past) close relationships.

## **5. Company Obligations - Prevention Measures for Incidents of Violence and Harassment**

The Company reaffirms its zero tolerance for any incident of violence and harassment, in any form it may take, including sexual harassment and gender-based violence, occurring in the workplace or in connection with work, whether perpetrated by one employee against another, by a supervisor, by an authorized person, who is considered an employer, by a client, visitor, supplier, or any third party. The Company takes all appropriate and necessary measures aimed at both the prevention and, if necessary, the handling and management of such incidents and forms of behavior.

Specifically, the Company:

- Provides information to its employees regarding the handling of incidents of violence and harassment, managing these incidents, their responsibilities, and their rights.
- Monitors the implementation of this policy and takes action against employees who do not comply.
- Ensures a safe and fair working environment.
- Imposes necessary and appropriate sanctions in the event of the identification of any prohibited behavior by any employee, client, visitor, or supervisor.



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### **6. Rights and Responsibilities of Employees**

Every employee has the right to:

- be treated with respect and courtesy
- not to be the recipient of violent behavior, harassment, including sexual and gender-based violence, discrimination, and bullying
- report any incident of prohibited behavior in the workplace (according to this policy, as detailed below), without being victimized or subjected to any adverse consequences or retaliation.

**Every employee is obligated to:**

- comply with this policy and all applicable and current procedures to ensure both their personal protection and that of other employees in the company
- immediately report any incident of violence and harassment to their supervisor
- cooperate in the investigation of any complaint that may have been submitted according to the procedure outlined below.

### **7. Additional Obligations of Management and Supervisors**

Specifically, the supervisors of the company are additionally required to:

- ensure the implementation of this policy within their area of responsibility
- establish appropriate standards of behavior within their area of responsibility
- refrain from engaging in any unwanted and prohibited behaviors in the course of performing their duties
- take immediate action when they become aware of any prohibited behavior
- encourage employees to report any incidents of violence and harassment they have experienced or witnessed
- inform the Company's Management immediately about any incidents of violence and harassment that occurred within their area of responsibility.

### **8. Guidelines for the Prevention and Handling of Incidents of Violence and Harassment**

In order to prevent and address incidents of violence and harassment in the workplace, employees are advised to:

- Seek comprehensive and objective information regarding the legislation related to violence and harassment and the protection mechanisms. The Company can provide assistance and information on these matters.
- Correct their behavior when they realize it bothers or offends a colleague or coworker.
- Define their personal boundaries with those around them.
- Not ignore incidents of violence and harassment.
- Not feel uncomfortable, ashamed, or blame themselves for the perpetrator's behavior.
- Not justify the perpetrator's behavior.
- Deflect or calmly and decisively address violent or harassing behavior.
- Maintain a log of details regarding incidents of violence and harassment.
- Report incidents to their supervisor or the company.

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### **9. Internal Complaint Submission and Management Process – Reporting Person**

Any employee who experiences any incident of violence and harassment may submit an oral or written complaint to the Responsible Systems Officer, Mrs. Peny Petroulia, and the General Manager, Mr. Nikos Floros, who are designated as the "reporting persons" for this policy. The complaint may be submitted in person or via email to the address infohellas@snf.com. The complaint cannot be anonymous.

The complaint should include the details of the person being reported, i.e., the individual who has exhibited a form of prohibited behavior, as well as the specific incident(s) that substantiate it.

The reporting persons will thoroughly investigate each complaint and gather any necessary information related to it. Complaints and investigations will remain strictly confidential to the greatest extent possible, considering the sensitivity of the case and the confidentiality of all involved parties.

Specifically, the reporting persons may communicate with the complainant and the accused, interview witnesses, and request the submission of documents that may exist and demonstrate whether or not an incident of violence and harassment occurred.

Once the reporting persons have completed their investigation, they will submit a written report to the company's management, detailing the outcome of the investigation. The results of the investigation will be simultaneously communicated to both the complainant and the accused, so they are made aware of them. The completion of the investigation and the submission and notification of the findings should take place as soon as possible, and in any case, no later than three weeks from the date the complaint was submitted by the complainant.

If the investigation confirms that an incident of violence and harassment has occurred, the company's management will take all necessary, appropriate, and relevant measures against the accused, on a case-by-case basis. These measures may include, but are not limited to: a) a compliance notice,

- b) a change in the workplace, working hours, location, or method of providing work,
- c) termination of the employment or collaboration agreement with the company.

### **10. Rights of Victims**

According to the applicable legislation, any person who experiences an incident of violence or harassment has the right to leave the workplace for a reasonable period without losing pay or facing any other negative consequence, if they reasonably believe there is an imminent serious danger to their life, health, or safety. This is particularly relevant when the employer is the perpetrator of such behavior or when the employer fails to take appropriate measures to restore workplace peace, or when those measures are insufficient to stop the violent or harassing behavior.

In this case, the individual leaving the workplace is required to inform the "reporting persons" in writing beforehand, detailing the incident of violence and harassment and the events that justify their belief that there is an imminent serious risk to their life, health, or safety.

Additionally, employees who face incidents of violence and harassment at work have the right to appeal to the competent authorities, as stipulated by the law. These rights include:

- a. The right to judicial protection,
- b. The right to file a complaint and request the initiation of a labor dispute investigation with the Labor Inspection Authority, within its legal responsibilities,
- c. The right to report to the Ombudsman, within the scope of its legal responsibilities.



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### **11. Obligation of Impartiality and Confidentiality**

The designated reporting persons are required to act objectively and impartially during the investigation of complaints. Additionally, they must treat all parties involved with respect and maintain confidentiality and discretion. The disclosure or dissemination of any details concerning the investigated complaint to non-involved parties is strictly prohibited.

These obligations also apply to the company's management during the final stage of taking measures and making decisions.

### **12. Prohibition of Retaliation - Victimization of the Whistleblower**

Retaliation and victimization of the complainant, who as the affected party, exercised their rights and submitted a written complaint regarding an incident of violence and harassment, are strictly prohibited. Any form of retaliation or victimization against the complainant constitutes a serious violation of this policy and will result in consequences for the individual engaging in such behavior.

### **13. Collaboration with Administrative and Judicial Authorities**

In cases where the affected person has filed a complaint about an incident of violence and harassment before any administrative or judicial authority, the company is committed to providing any necessary assistance and support, as well as any available information or documents to the relevant authorities.

### **14. Cases of Domestic Violence**

The company will take measures, to the extent possible, to protect employment and support employees who are victims of domestic violence. Any employee who has been a victim of domestic violence that extends to the workplace can report this orally or in writing to the designated contacts to inform the company and take the appropriate and necessary actions.

### **15. Exceptions**

There are no exceptions to the application of this Policy.

Employees who need further information or have questions about this policy can contact the designated persons for guidance.