
**POLICY FOR THE PREVENTION AND FIGHTING OF VIOLENCE AND
HARASSMENT AT WORK AND THE MANAGEMENT OF INTERNAL
COMPLAINTS FOR INCIDENTS OF VIOLENCE AND HARASSMENT
OF THE PRIVATE DIAGNOSTIC LABORATORY OF MOLECULAR
AND CYTOGENETIC ANALYSIS "GENOTYPOS"**

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The **Private Diagnostic Laboratory Genotypos**, demonstrating zero tolerance for incidents of violence and harassment in the workplace, adopts this policy in compliance with Articles 9 and 10 of Law 4808/2021, which ratified the International Labour Organization Convention No. 190 of 21.06.2021 on the elimination of violence and harassment in the world of work, the text of which is appended verbatim to the law.

1. Purpose

The purpose of this policy is to create and establish a work environment that respects, promotes, and ensures human dignity and the right of every person to a world of work without discrimination, violence, and harassment. The Private Diagnostic Laboratory Genotypos states that it recognizes, respects, and protects the right of every employee to a work environment free from violence and harassment and that it does not tolerate any such behavior of any form by any person.

2. Scope

This policy covers the persons referred to in paragraph 1 of Article 3 of Law 4808/2021, and its scope and protection include all types of employees and workers at the Private Diagnostic Laboratory Genotypos, regardless of their contractual status, as well as individuals applying for work and other individuals who transact or cooperate with it.

3. Prohibited Forms of Behavior - Definitions

Violence and harassment. "Violence and harassment" refer to behaviors, actions, practices, or threats thereof, intended to cause, result in, or potentially lead to physical, psychological, sexual, or economic harm, whether occurring individually or repeatedly.

Harassment. "Harassment" refers to behaviors intended to violate the dignity of an individual, creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether it constitutes discrimination, including harassment due to gender or other discrimination reasons.

Gender-based harassment. "Gender-based harassment" refers to behaviors associated with a person's gender, intended to violate the dignity of the person and create an intimidating, hostile, degrading, humiliating, or offensive environment as per Article 2 of Law 3896/2010 (A' 107) and paragraph 2 of Article 2 of Law 4443/2016 (A' 232). These behaviors include sexual harassment as defined by Law 3896/2010 and behaviors associated with sexual orientation, expression, identity, or gender characteristics.

Discrimination. "Discrimination" refers to differential treatment of people arising from prejudices or interests, any act causing unjustified separation of individuals based on groups, classes, or other categories they belong to or are perceived to belong to. Indicatively, discrimination based on gender, age, language, nationality, race or ethnicity, disability, religious beliefs, or sexual orientation.

Incidents. Prohibited behaviors under this policy include, but are not limited to: insults based on discrimination due to gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices, threats, verbal or gestural abuse, public or private insults, undermining or ridiculing an individual or their abilities, whether privately or in front of others, threatened or actual physical violence, persistent or unjustified criticism, offensive, malicious, derogatory, obscene, or mocking comments and their dissemination, innuendos, sexist or racist jokes and comments, use of offensive language, verbal sexual harassment or propositions, innuendos that sexual favors can advance one's career or that refusal of sexual relations may negatively impact professional advancement at the Private Diagnostic Laboratory Genotypos, offering benefits (e.g., promotion or salary increase) in exchange for sexual favors or creating an environment promoting "sexual contact" as a means for professional development in the workplace, retaliation or threats of retaliation after rejection of sexual propositions.

Cyberbullying, sending harassing and offensive content via SMS, email, social media, fax, or letter, persistent or offensive questioning about age, marital status, personal life, sexual orientation, as well as similar questions about race or ethnicity, including cultural identity and religion. Also included are visual forms of harassment such as posters, cartoons, caricatures, photos, or drawings that are derogatory based on characteristics protected by law. Unwanted physical contact such as touching, pinching, sexual gestures, hitting, grabbing, pushing, and any form of physical violence. Violation of privacy, deliberate partial or complete destruction of personal items, vehicles, or property, interference or obstruction of normal work, movement, and physical integrity of the individual, physical exclusion or confinement, sexual gestures, physical surveillance, stalking. These actions are indicative and do not constitute an exhaustive list of prohibited acts.

Permissible behaviors. The following behaviors do not constitute incidents 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. Assignment of tasks and guidance on how and when they should be done. Requests for updates or progress reports. Approval or justified denial of leave. Requests for documentation of absence due to health reasons based on current

legislative provisions. Moral or financial rewards for excellent employee performance. Providing constructive feedback on work performance.

4. Scope – Definition of the Workplace

4.1 A workplace is defined as a broader spatial context where incidents of violence and harassment can occur. The aforementioned behaviors may take place in all facilities of the Private Diagnostic Laboratory Genotypos where employees provide their services, as well as in areas where employees take breaks for rest or meals, and in spaces for personal hygiene and care.

Additionally, this policy covers all types of commuting to and from work, other travel, educational seminars, training, as well as social events and activities related to work or connected with the actions of the Private Diagnostic Laboratory Genotypos. Finally, it applies to all forms of communication related to the Private Diagnostic Laboratory, including those conducted via information and communication technologies (e.g., email, Zoom or Teams meetings, social media, etc.).

4.2 Domestic Violence. All acts of physical, sexual, psychological, or economic violence occurring within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners, regardless of whether the perpetrator shares or previously shared the same residence with the victim. Domestic violence that occurs in the workplace, for example, through physical violence, sexual harassment, and stalking by current or former partners, constitutes a serious form of workplace violence.

Acts of domestic violence, including stalking/surveillance, can also be perpetrated by individuals in the same work environment with whom there are (or have been in the past) close relationships. Domestic violence, in any of the aforementioned forms, that is directed at an employee during telework.

5. Assessment of the Risks of Violence and Harassment at Work

5.1 Evaluation of Risk Factors and Improvement Measures

The **Private Diagnostic Laboratory Genotypos**, in collaboration with all its departments, studies potential risk factors related to the nature and scope of the provided work, including psychosocial risks and the risks of violence and harassment at work. The goal is to assess existing working conditions and adjust them to minimize the likelihood of incidents of violence and harassment in the workplace.

Examples of risk factors include: high stress in the workplace, isolated or enclosed workspaces, the layout of workstations (e.g., dense arrangement of workstations, unequal gender distribution in job positions, hierarchy of job positions in the organizational chart, etc.), the level of security of facilities and the frequency of its checks, lack of appropriate training, individuals with a history of violent behavior, delivery of goods or services by external partners or distributors, working alone or in an isolated space, working late at night or in the early morning hours, personal or domestic issues spilling over into the workplace.

5.2 Organization of Trainings, Issuance of Informational Materials, and Regular Training of Personnel on Violence and Harassment Issues

All employees must understand the behaviors that constitute violence and harassment, which are unacceptable and condemnable. The designated point of contact for issues of violence and harassment will ensure that the staff receives appropriate awareness and training on these matters and will communicate this policy both within and outside the Private Diagnostic Laboratory Genotypos.

6 Prevention Measures for Incidents of Violence and Harassment

6.1 Information on the Rights of Affected Persons.

The Private Diagnostic Laboratory Genotypos states that in the event a person is affected by an incident of violence and harassment during employment access, during the employment relationship, or even if the contract or employment relationship under which the incident or behavior is alleged to have occurred has ended, it has:

- a) the right to judicial protection,
- b) the right to appeal, submit complaints, and request the conduct of a labor dispute with the Labor Inspectorate, within its legal competencies,
- c) the right to report to the Ombudsman, within his legal competencies, as well as
- d) the right to file a complaint within the Laboratory in accordance with the complaint management policy.

The specific procedures for submitting, managing, and internally investigating reports include detailed steps that any complainant must take, as well as the responsibilities of the Management of the Private Diagnostic Laboratory Genotypos and the actions they must take to ensure the effective management of related incidents. In any case, when a report or complaint of such behavior arises within the Private Diagnostic Laboratory, the affected person retains every right to appeal to any competent authority. Any employee who experiences domestic violence that extends into the workplace can report this verbally or in writing to the Managing Director, Ms. Maria Ploussi, so that the Private Diagnostic Laboratory Genotypos can be informed and take appropriate and necessary measures.

6.2 Actions for Informing, Sensitizing, and Supporting Personnel.

The Private Diagnostic Laboratory Genotypos hereby informs its staff and maintains in a prominent place the contact details of the competent administrative authorities to which any affected person has the right to appeal (Labor Inspectorate, Ombudsman). It specifically informs about the complaint hotline SEPE (15512), the citizen service line 1555, and the website <https://1555.gov.gr/>, as well as the immediate psychological support and counseling service for women victims of gender-based violence, who can contact the SOS Line 15900 (General Secretariat for Demographic and Family Policy and Gender Equality [G.G.I.F.]).

Within its capabilities, the Private Diagnostic Laboratory Genotypos takes all appropriate measures and makes reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence. Additionally, it takes all necessary steps to inform and sensitize the staff, using the appropriate aforementioned means to combat violence and harassment. It ensures that everyone is aware of the company's policies and procedures against incidents of violence and harassment, knows where to turn in the event of violence or harassment, and understands the options provided by law.

The Private Diagnostic Laboratory Genotypos trains its staff in every appropriate way and means to recognize discrimination, violence, and harassment in the workplace and to provide the necessary support to its personnel and associates. It also encourages the participation of employees and management in training programs and educational sessions related to the recognition and management of potential risks of violence and harassment. Furthermore, it can conduct seminars with mental health specialists or providers of counseling services.

7 Procedure for Submission and Management of Internal Complaints – Reference Person

Any employee who has experienced an incident of violence and harassment may submit a verbal or written complaint to Ms. Maria Ploussi, who is designated as the "contact person" for this policy. Complaints can be submitted in person or via email to mploussi@genotypos.gr. Anonymous complaints are not accepted.

The complaint must include the details of the accused individual, i.e., the person who engaged in the prohibited behavior, as well as specific incident(s) that constitute the behavior. The contact person will thoroughly investigate each complaint and collect any necessary information related to it. Complaints and investigations will remain strictly confidential to the greatest extent possible, taking into account the sensitivity of the case and the privacy of all involved.

Specifically, the contact person may: Speak with the complainant and the accused, Interview witnesses, request documents that may exist and prove whether any incident of violence and harassment took place, communicate with the supervisors of each department if the complainant approached them.

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communicate with the supervisors of each department if the complainant approached them.

Once the contact person completes their investigation, they will submit a written report to the Management of the Private Diagnostic Laboratory Genotypos, detailing the investigation's findings. The results of the investigation will be simultaneously communicated to both the complainant and the accused so that they are informed. The completion of the investigation and the submission and notification of the contact person's report must occur 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 an incident of discriminatory treatment, violence, harassment, or retaliation, the Management of the Private Diagnostic Laboratory Genotypos will take all necessary, appropriate, and proportionate measures against the accused, depending on the case.

These measures may include, but are not limited to:

- a) A compliance recommendation,
- b) Changing the job position, schedule, location, and manner of work,
- c) Termination of the employment or cooperation contract with the Diagnostic Laboratory, subject to the prohibition of abuse of rights under Article 281 of the Civil Code.

Complaints that are proven to be blatantly malicious will be considered inadmissible and will be further investigated at the discretion of the company, both in terms of motives and involved parties, in order to restore order by any legal means and methods.

8 Rights of Affected Individuals

According to current legislation, any person who experiences an incident of violence and harassment has the right to leave the workplace for a reasonable period without loss of salary or other adverse consequences, provided they reasonably believe there is an imminent serious risk to their life, health, or safety. This is especially true when the employer is the perpetrator of such behavior, or when the employer fails to take necessary and appropriate measures to restore workplace peace, or when these measures are insufficient to stop the behavior of violence and harassment.

In this case, the departing employee is obliged to inform the contact person in writing beforehand, detailing the incident of violence and harassment and the circumstances justifying their belief that there is an imminent serious risk to their life, health, or safety.

Employees who face incidents of violence and harassment at work have the right to appeal to the competent authorities as stipulated by law, including:

- a. The right to judicial protection,
- b. The right to appeal and file a complaint and request a labor dispute with the Labor Inspectorate within its legal competencies,
- c. Reporting to the Ombudsman within his legal competencies.

9 Obligation of Impartiality and Confidentiality

The contact person is required to act in an objective and impartial manner during the investigation of complaints. Additionally, they must treat all involved parties with respect and handle matters confidentially and discreetly. The disclosure or notification of details concerning the examined complaint to non-involved parties is strictly prohibited. These obligations also apply to the Management of the Private Diagnostic Laboratory Genotypos during the final stage of taking measures and making decisions.

10 Prohibition of Retaliation - Victimization of the Complainant

Retaliation and victimization of the complainant, who as an affected person has asserted their rights and submitted a written complaint regarding an incident of violence and harassment, are strictly prohibited. Retaliation and victimization of the complainant constitute a serious violation of this policy and entail consequences for the person acting in this manner. If any employee or third party associated in any way with the Private Diagnostic Laboratory Genotypos believes they have been subjected to retaliatory behavior due to submitting a complaint or providing assistance in the investigation of incidents of discrimination, violence, or harassment, they must follow the aforementioned procedure to report the incident of retaliation.

11 Cooperation with Administrative and Judicial Authorities

The Private Diagnostic Laboratory Genotypos, as well as any responsible person or service for receiving and managing such complaints, cooperates with any competent public, administrative, or judicial authority that, either ex officio or upon the submission of a request by an affected person, within its competence, requests the provision of data or information. They are committed to providing assistance and access to the data. To

this end, any data collected, in any form, is kept in a relevant file in compliance with the provisions of Law 4624/2019 (A' 137) "Personal Data Protection Authority, measures for the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 for the protection of natural persons against the processing of data."

This Policy is posted on the official website of the Private Diagnostic Laboratory at the following link:
www.genotypos.gr.

12 Revision Table

Version Number:	Effective Date:	Reason/Description of Change:
01	16/01/2024	Initial Version