



**Policy for the Prevention
and Combating Violence and
Harassment in the Workplace and
the Handling of Related Reports**



A blurred photograph of a modern office interior. Large windows on the right side let in bright, warm sunlight, creating a lens flare effect. Several people are visible in motion, their figures blurred into streaks of color (blue, yellow, black) as they move across the frame. Potted plants are visible near the windows. The overall atmosphere is one of a busy, active workplace.

1. Purpose

The Company undertakes to comply with all measures and obligations related to the implementation of the provisions of Articles 58–69, 507–508, 533 and 537 of Presidential Decree 62/2025 (Labour Law Code) concerning the prevention and addressing of all forms of violence and harassment in the workplace, including gender-based violence and harassment and sexual harassment.

The Purpose of above provisions and of this Policy is to set a coherent and modern framework for preventing, addressing and combating all forms and incidents of violence and harassment, contributing to the creation of a working environment that respects, promotes and safeguards the right of every person to a world of work free of violence and harassment.

The Company declares that it recognizes and respects the right of every employee to work in an environment that safeguards Human dignity and is free of violence and harassment and that it will not tolerate any such conduct, in any form, by any person. The Company further recognizes that violence and harassment, including sexual harassment and gender-based harassment, may have serious consequences for employees' dignity, mental health and sense of safety. For this reason, the Company encourages the prompt reporting of such incidents and is committed to addressing them with the utmost seriousness and confidentiality.

This Policy has been adopted in accordance with Article 62 of Presidential Decree 62/2025 and the regulatory legislation pursuant thereto.



2. Scope

This Policy applies to all OTE Group companies, provided that its implementation has been approved for the respective Group company by the competent corporate body or an authorized management executive.

The scope of this policy (Article 59 of Presidential Decree 62/2025) covers all employees and other persons working for OTE Group companies (hereinafter referred to as “Company”), irrespective of their contractual status. This includes individuals engaged under a project contract, an independent services contract, a remunerated mandate contract, persons engaged through third-party service providers, as well as persons attending training, including trainees and apprentices, volunteers, former employees whose employment relationship has ended, as well as job applicants.

In particular, with regard to individuals working for the Company:

(a) persons employed under employment contracts or employment relationships through Temporary Employment Agencies (TEAs), such individuals fall within the protection that the

Company (indirect employer), must provide to its employees, as well as, in the Company’s obligations to take appropriate measures in the event of a breach of Article 60 of Presidential Decree 62/2025 by temporary staff employed herein, given that the managerial authority is exercised by the Company over such workers.

In such an event, the Company forwards the relevant file to the direct employer (TEA), since the exercise of disciplinary authority remains with the direct employer, is governed by its own framework, and is not transferred by virtue of the assignment agreement to the Company.

(b) persons assigned to the Company under a genuine employee secondment arrangement and subject to their written consent, are covered by the protection that the Company (host employer), is required to provide to its employees, as well as in the Company’s obligation to take appropriate measures in the event of a breach of Articles 58–69, 507–508, 533 and 537 of Presidential Decree 62/2025 by a seconded employee working for the Company, given that the managerial right is exercised by the Company.

However, in the event of violation of the prohibition of any form of violence and harassment by a seconded employee at the Company, the Company shall also forward the relevant case file to the initial employer, since disciplinary authority remains with the initial employer and is governed by its own framework.

3. Access Rights

This Policy is posted on the Company's Process Web and Intranet and is freely accessible to all employees and other persons falling within its scope. It has been incorporated into and forms an integral part of the Employee Work Regulations

of those OTE Group companies that are under the obligation to draw up one and fall within the scope of this Policy. The same Employee Work Regulations include provisions governing disciplinary offences, the procedure for imposing disciplinary sanctions and the corresponding disciplinary penalties in cases where incidents of violence and harassment in the workplace are established.

In the event that the document cannot be accessed by an employee or other persons working for the Company who falls within the scope of this policy, the information will be provided by the relevant Director.

This Policy is freely accessible to all employees and other persons falling within its scope



4. Legal framework

All forms of violence and harassment, whether linked with or arising out of work, including gender-based violence and harassment and sexual harassment, are prohibited.

Specifically:

a) the term ‘violence and harassment’ shall be understood as a range of behaviors and/or practices, or threats thereof, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, whether a single occurrence or repeated;

(b) the term “harassment” means behaviors that aim at or result in the violation of a person’s dignity and the creation of an intimidating, hostile, degrading, humiliating, dehumanizing or offensive environment, regardless of whether or not they are discriminatory, and includes gender-based harassment or harassment related to other grounds of discrimination;

(c) the term “sexual harassment” means any form of unwanted verbal, psychological or physical conduct of a sexual nature that results in the violation of a person’s dignity, in particular through the creation of an intimidating, hostile, degrading, humiliating or offensive environment

(d) the term “gender-based harassment” means behaviors directed at persons because of their sex or gender that aim at or result in the violation of that person’s dignity and the creation of an intimidating, hostile, degrading, humiliating, or offensive environment. These behaviors include sexual harassment, as well as forms of conduct directed at persons because of their sexual orientation, expression, identity or gender characteristics

Incidents of violence and harassment against persons in scope by this Policy may occur, particularly:

(a) at the workplace, including public and private places and places where the employee performs their work, receives remuneration, takes a rest break or a meal, or uses sanitary, washing and changing facilities or employer-provided accommodation;

(b) when commuting to and from work, and during work-related trips, travel, training, and work-related events and social activities;

(c) through work-related communications, including those enabled by information and communication technologies.

5. Assessment of the Risks of Violence and Harassment in the Workplace

The Company must identify the risks associated with violence and harassment, taking into account, inter alia, any inherent risk arising from the nature of the activity, the job position, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks related to specific groups of employees and other persons working for the Company (such as night-shift workers, new recruits).

In order to perform the risk assessment, the Company may use both internal digital Enterprise Risk Assessment tools, such as the Enterprise Risk Management - TRMS tool (Telekom Risk Management Solution tool), or those available in Greece through the interactive web platform OIRA (Online Interactive Risk Assessment) accessible on the website of the European Agency for Safety and Health at Work (EU- OSHA) <http://www.oiraproject.eu>.



6. Measures for Prevention, Control, Mitigation, Risk Management as well as the Monitoring of such incidents or forms of conduct

Measures and administrative practices to prevent, control, and mitigate the risks of violence and harassment may include:

- Encouragement to maintain a working climate where respect for human dignity, cooperation and mutual assistance constitute core values
- Open communication with the Company, direct supervisors and colleagues
- Whistleblowing and Non-Retaliation Policy
- Ensuring that employees have the necessary training/information to carry out their duties, particularly in jobs that have higher risk of workplace violence and harassment
- Technical measures, such as the installation of emergency alarms, improved lighting, etc.
- Actions to raise awareness among employees of healthy patterns of behavior (e.g. addiction prevention), but also on issues concerning vulnerable categories of employees
- Guidance and support for victims of violence and harassment or of domestic violence victims to reintegrate them into the workplace
- Training of employees on responding to incidents of violence
- Annual evaluation of the effectiveness of the preventive and mitigation measures applied to the situations under consideration, and revision/update of the Risk Assessment process and the related measures derived from it.

7. Information and awareness-raising actions for Company employees and other persons working for the Company

The Company undertakes to provide employees and other persons working for the Company falling within the scope of this Policy with updates and information, in accessible formats and as appropriate, on the identified hazards and risks of violence and harassment, and the associated prevention and protection measures, on the procedures that exist at the corporate level and on the legal provisions in the event of such incidents.

In this context, the Company, may, inter alia:

- Organize targeted employee and other persons working for the Company, meetings to discuss relevant issues and address potential risks in a timely manner;
- Conduct seminars/webinars for awareness with mental health specialists or counselling service providers, representatives of volunteer organizations, etc;
- Encourage the participation of employee representatives and management in training programs and seminars on the identification and management of hazards and risks associated with violence and harassment at work.



8. Rights and obligations of employees and other persons working for the Company, as well as individuals exercising managerial authority or representing the Company

In the event that a person is subjected to an incident of violence and harassment when accessing employment, during the employment relationship or even if the contract or employment relationship under which the incident or conduct is alleged to have occurred has expired, the affected party has a right to:

- a) judicial protection,
- b) recourse, filing a report, and submitting a petition for a labor dispute to the Labor Inspectorate, within the scope of its statutory powers,
- c) file a report with the Greek Ombudsman, within the scope of their statutory powers; and
- d) submit a report within the Company in accordance with the "OTE Group Whistleblowing and Non-Retaliation Policy".

In any case, when a report of such conduct arises within the Company, the aggrieved party reserves every right to seek recourse before any competent authority.

Any person within the scope of this Policy who suffers an incident of workplace violence and harassment against them, must first notify the Company in writing, stating the incident of violence and harassment and the circumstances that justify their belief that the situation presents an imminent and serious danger to life, health or safety. In cooperation with the Company's relevant business units, the appropriate measures to deal with the incident (e.g. removal from the workplace) and the necessary implementation time of such measures, shall be determined.

In this case, if the danger ceases to exist and the person concerned, who was removed from the workplace, refuses to return, the Company may appeal to the Labor Inspectorate with a request to resolve the dispute.

When an individual exercising the managerial right or representing the Company violates the prohibition of violence and harassment in entering into or refusing to enter into a legal relationship with a person falling within the scope of this Policy, or in the development, duration or termination of such a relationship, violates the labor legislation, the administrative sanctions as defined in Article 573(2)(a) of Presidential Decree 62/2025 (e.g. administrative fine, etc.) shall be imposed against the Company.

In any case, the violation of the prohibition of violence and harassment gives rise, among other things, to a claim for full compensation of the person affected, which covers both non-pecuniary and pecuniary damage, as well as moral damage.

The contact details of the competent administrative authorities to which any aggrieved party has the right to appeal (Labor Inspectorate, Greek Ombudsman) are posted on the Company's intranet.

Furthermore, the aggrieved individuals can also contact the Employment Inspection Authority (SEPE) reports/grievances telephone line through the citizen service line 1555, as well as the immediate psychological support and counselling service for women victims of gender-based violence via the SOS line 15900.

In addition, the Company provides 24-hour telephone communication channels through the "Next to you" psychological support line at 8001150327 (code 1588), where any incidents of violence or harassment can be reported and employees and other persons working for the Company can receive support.

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9. Designation of a person of reference ("contact person") for providing guidance and information on the prevention and addressing of violence and harassment at work

The Company has appointed the Head of Compliance & Enterprise Risk Management OTE Group as the "person of reference" to provide guidance and information regarding the prevention and management of violence and harassment at work while the following channel of communication has been set up:

- Email: askmecompliance@telekom.gr

The role of the "person of reference" is informative: it is to guide and inform employees and other persons working for the Company regardless of whether or not the person of reference was contacted in response to an incident or to report a violence and harassment incident or not. In any case, it is the duty of the abovementioned person of reference to protect Personal Data (PD) which may come to their knowledge in the performance of their role.

10. Employment protection and support of employees and other persons working for the Company - victims of domestic violence

The Company takes measures that actively demonstrate its social responsibility towards the phenomenon of domestic violence. Indicatively, such measures may include employment protection, the provision of special leave or flexible working arrangements at the request of the employee or other person working for the

Company - victim of domestic violence, in order to support them in maintaining employment and their smooth reintegration after such incidents, especially in cases involving minor children or children with disabilities or serious illnesses.

11. Receipt and investigation of enquiries and reports

This Policy is implemented in accordance with the relevant provisions of the OTE Group Whistleblowing and Non-Retaliation Policy, which is applied, with respect to the report handling procedure, by the competent bodies and under the relevant guarantees of protection.

For queries regarding compliance with this Policy or in case of doubt, grievances, violation or alleged violation of this Group Policy, employees falling within its scope may contact the OTE Group Compliance Office through the following communication channels:

- Email: askmecompliance@telekom.gr (for enquiries)
- E-Mail: tellme@telekom.gr (for grievances / reports)
- E-Mail: humanrights@telekom.gr (in case of doubt or concern about any relevant issue)

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The competent employees of OTE Group's Compliance Office shall inform the aggrieved party of the possibility to also submit, at any stage of the procedure followed within the Company, a report to the competent administrative authorities (Labor Inspectorate, Greek Ombudsman) within their competence, as well as to the judicial authorities, at the aggrieved party's option.

The Company and its competent employees, who have received specific training for this purpose, undertake to receive and not to obstruct the receipt of, to investigate and address promptly any such report, to investigate and examine the report with impartiality and respect for human dignity.

For the purpose of examining and handling a report, the competent employees of OTE Group Compliance may have access to Company records, audiovisual material collected by the Company and any other appropriate means for gathering information and evidence during the examination of the report and for establishing the facts of the case. Appropriate measures may also be implemented to ensure the security of the relevant information and to address potential conflicts of interest.

The Company shall take all necessary measures to ensure that individuals who, in good faith, provide information regarding incidents of violence or harassment in the workplace do not suffer any personal, professional or financial detriment as a result of providing such information.

Personal data is processed in accordance with the Law, the Binding Corporate Rules for the Protection of Personal Data within the DT Group and the Rules for the Proper Use of Communication Media, Access & Control Systems of Company Computers.

The data collected (personal data and other information) are kept for five (5) years, for the purpose of investigating a report, violation or alleged violation of this Policy, unless there are serious reasons that require their retention (e.g. ongoing investigation, pending legal proceedings).

The termination or dissolution, in any way, of the legal relationship on which the employment is based, as well as any other unfavorable treatment of a person falling within the scope of this Policy, is prohibited and null and void where it constitutes retaliatory conduct or countermeasure within the meaning of Article 44 of Presidential Decree 62/2025 in cases of violence and harassment in the workplace.

If an employee or other persons concerned by this Policy, violate the prohibition of violence and harassment in the workplace the Company is obliged to take the necessary and appropriate measures against the reported individual where applicable, in order to hinder and prevent the recurrence of similar incidents or behaviors. Such measures may include recommendations to comply; changing the employ-

ment position, working hours, place or manner of employment, or terminating the employment or cooperation relationship, without prejudice to the prohibition of abuse of right as defined in Article 281 AK.

The Company as well as OTE Group Compliance Office employees responsible for receiving and handling such reports shall cooperate with any competent public, administrative or judicial authority, which, either ex officio or upon request by an aggrieved person, within the scope of its competence, requests the provision of data or information, and undertake to provide assistance and access to the data.

For this purpose, all information and evidence collected, in whatever form, shall be retained in the relevant case file in accordance with the provisions of Law 4624/2019.

In cases relating to violence and harassment in the workplace, legal entities and associations of persons, including trade unions, may, where they can demonstrate a legitimate interest and have obtained the written consent of the employee, other person working for the Company or aggrieved party concerned, file an appeal or claim in the name of the latter before the competent administrative or judicial authorities or intervene in support of their interests. The aggrieved party shall at all times retain the right to participate in, intervene in or discontinue such proceedings.

12. Entry into Force of this Policy

This Policy has been incorporated into and constitutes an integral part of the Internal Employee Regulations of OTE, GERMANOS, Telekom Technical Services and Telekom e-Value, which have entered into force pursuant to the relevant provisions of the Enterprise Collective

Labour Agreement concluded with the respective employees' trade union.

For all other OTE Group companies where no enterprise trade union exists, this Policy shall enter into force upon approval by the competent corporate body of the respective company.

OTE Group declares that it recognizes and respects the right of every employee to work in an environment free of violence and harassment and will not tolerate any such conduct, in any form, by any person.



