

**POLICY FOR THE PREVENTION OF VIOLENCE AND HARASSMENT IN THE WORKPLACE /
MANAGEMENT OF INTERNAL COMPLAINTS REGARDING INCIDENTS OF VIOLENCE AND
HARASSMENT
OF THE LEGAL ENTITY UNDER PRIVATE LAW UNDER THE NAME THESSALONIKI
INTERNATIONAL FILM FESTIVAL**

(MINISTERIAL DECISION No. DIDAD/F.64/946/oik.858 - GOV. GAZ. B' 343/26.01.2023, AS AMENDED AND CURRENTLY IN FORCE, AND LAW 4808/2021)

PART A – GENERAL PROVISIONS

1. Introduction: The public-benefit, non-profit Legal Entity under Private Law under the name THESSALONIKI INTERNATIONAL FILM FESTIVAL (hereinafter FESTIVAL), headquartered in Thessaloniki, at 10 Aristotelous Square (P.C. 54623), with Tax Identification Number 090290161, registered with the D' Public Tax Office of Thessaloniki, and represented by its General Director, Ms. Elise Jalladeau (Ελίς Ζαλαντό), affirms that the FESTIVAL complies with all measures and obligations related to the implementation of the provisions of Ministerial Decision No. DIDAD/F.64/946/oik.858 (Gov. Gaz. B' 343/26.01.2023), as currently in force, for the prevention and management of incidents of violence and harassment in the workplace in public entities, issued pursuant to Law 4808/2021.

The FESTIVAL recognizes and respects every employee's right to a work environment free from violence and harassment and does not tolerate any such behavior, of any form, from any individual. The preventive, monitoring, mitigation, and response measures implemented by the FESTIVAL concerning risks of violence and harassment in the workplace, as well as its efforts in raising awareness and informing its personnel on these issues—combined with its work organization methods, the nature of its activities, and its strict compliance with the applicable legislation on occupational health and safety—significantly contribute to enhancing the level of protection for employees and effectively addressing associated risks.

2. Prohibition of Violence and Harassment in the Workplace

The purpose of this Policy is to prevent and combat violence and harassment that occurs during work, is connected to work, or arises from it, including gender-based violence and harassment as well as sexual harassment. Additionally, this Policy aims to create and establish a workplace environment that respects, promotes, and safeguards human dignity and the right of every individual to a world of work free from violence and harassment.

3. Definitions for the Purposes of this Policy:

(a) “Violence and harassment” refer to behaviors, acts, practices, or threats thereof that aim at, result in, or may result in physical, psychological, sexual, or economic harm, whether they occur as isolated incidents or repeatedly.

(b) “Harassment” refers to behaviors that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether they constitute a form of discrimination. This includes harassment based on gender or other grounds of discrimination.

(c) “Gender-based harassment” refers to behaviors related to a person's gender that have the purpose or effect of violating their dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment.

(d) “Sexual harassment” refers to any form of unwanted verbal, psychological, or physical conduct of a sexual nature that aims at or results in the violation of a person's dignity, particularly by creating an

intimidating, hostile, degrading, humiliating, or offensive environment around them. It also includes behaviors related to a person's sexual orientation, gender expression, gender identity, or sex characteristics.

4. Scope of Application

This Policy applies to and covers all employees and personnel of the FESTIVAL, regardless of their contractual employment status or type of employment relationship. This includes individuals employed under project-based contracts, independent service agreements, paid mandate contracts, those working through third-party service providers, as well as individuals undergoing training, including interns and apprentices. It also extends to volunteers, former employees whose employment relationship has ended, and individuals in the process of appointment or recruitment.

PART B – Risk Assessment / What Constitutes Violence and Harassment in the Workplace

1. The risks arising from violence and harassment in the workplace can be highly severe, affecting both employees and the FESTIVAL. For employees, these risks include, in particular: **(a)** Violation of human dignity and the infliction of moral harm. **(b)** Induction of anxiety, stress, anger, and fear in the performance of work duties. **(c)** Development of psychosomatic symptoms, such as headaches, tachycardia, increased blood pressure, and sleep disorders. At the same time, the FESTIVAL itself also faces risks, including: **(1)** Disruption of labor relations and its smooth operation. **(2)** Legal and financial consequences. **(3)** Negative publicity.

2. Acts of violence and harassment against any of the aforementioned individuals may occur, in particular: **(a)** In the workplace, including public and private spaces and locations where the employee performs work, receives compensation, takes breaks—particularly for rest or meals—as well as in areas for personal hygiene and care, locker rooms, or accommodations provided by the FESTIVAL. **(b)** During commutes to and from work, other work-related travel, business trips, training sessions, as well as events and social activities associated with work. **(c)** During work-related communications, including those conducted through information and communication technologies.

Indicatively, the following are strictly prohibited, among others:

(a) Comments containing sexual content or other malicious remarks, directed at individuals who have not explicitly expressed a desire to receive such comments. **(b)** Comments or persistent inquiries about a person's physical appearance, gender, religion, race, or sexual orientation that cause embarrassment or discomfort. **(c)** Distribution and/or display of sexually explicit material or any other content that is offensive to human dignity or personality (e.g., photographic, digital, printed). **(d)** Unwelcome comments with sexual innuendos. **(e)** Sending messages with sexual content. **(f)** Sexual gestures or acts, including any unwanted physical contact intended to attack or coerce someone into engaging in a sexual relationship. **(g)** Persistent invitations to dates. **(h)** Threats or insinuations that someone's sexual favors may advance their career or that refusal to engage in a sexual relationship could negatively affect their professional trajectory within the organization. **(i)** Use of obscene, threatening, or offensive language, including cyberbullying. **(j)** Obscene, threatening, violent, or offensive gestures. **(k)** Coercion into sexual acts or contact. **(l)** Degrading or ridiculing an individual or their abilities, either privately or in the presence of others.

PART C – PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE

1. The FESTIVAL implements measures and administrative practices to prevent, monitor, mitigate, and address the risks of violence and harassment in the workplace, as well as to track such incidents or behaviors. These measures and administrative practices include, but are not limited to, the following: **(a)** Adoption of this Policy on the Management of Internal Complaints for Incidents of Violence and Harassment, ensuring that all complaints and related reports are received, investigated, and resolved confidentially and with respect for human dignity. The FESTIVAL may also maintain an Incident Log for reported cases. **(b)** Encouraging the maintenance of a work environment where respect for human dignity, cooperation, and mutual support are core values. **(c)** Implementation of technical measures, such as ensuring adequate lighting and other safety provisions. **(d)** Providing employees with information on potential risks of violence and harassment in the workplace, as well as related preventive and protective measures, including the rights and obligations of

both employees and the employer in handling such incidents. (e) Awareness-raising initiatives aimed at promoting healthy behavioral standards and addressing issues affecting vulnerable employee groups. (f) Guidance and support for victims of violence and harassment to facilitate their reintegration into the workplace. (g) Assisting any competent public, administrative, or judicial authority in the investigation of incidents of violence or harassment, upon request. (h) Regular assessment of the effectiveness of the implemented preventive and response measures, along with reviewing and updating the risk assessment and related measures. (i) Any other appropriate and necessary measure to achieve the objectives of this Policy.

2. The FESTIVAL: (a) Receives, investigates, and manages all complaints and related reports, demonstrating zero tolerance for violence and harassment, ensuring confidentiality, and handling cases in a manner that respects human dignity. Furthermore, it does not obstruct the receipt, investigation, or management of such complaints or reports. (b) Has posted this Policy both in the workplace and on the FESTIVAL's official website, outlining the procedures for reporting and addressing such behaviors, as well as providing contact details for the competent administrative authorities, in accordance with applicable legal provisions.

3. The personnel supervisors of each department of the FESTIVAL:

(a) Inform employees by all appropriate means about the applicable legal provisions concerning the prevention and management of violence and harassment in the workplace, as well as the relevant guidelines contained in general or specific codes of conduct and professional ethics guides.

(b) Take the necessary actions to educate, raise awareness, and train employees on the management of workplace violence and harassment incidents, as well as on the elimination or reduction of risks associated with such occurrences.

(c) Ensure the creation of a safe and confidential environment for employees who wish to report incidents of violence and harassment in the workplace, with the aim of addressing them in a timely manner in accordance with the applicable procedures.

4. Procedure and Authorities for Submitting Reports on Workplace Violence and Harassment Incidents

4.1. Any individual referenced in the Scope of Application section who has been affected by an incident of violence or harassment, even if their employment or contractual relationship has ended at the time the incident or behavior in question occurred, has the right to file a complaint, in addition to seeking judicial protection, as follows:

(a) Before the Greek Ombudsman (Chalkokondyli 17, 10432 Athens, E-mail: press@synigoros.gr, Tel.: (+30) 213 1306 600), as the authority responsible for promoting and monitoring the principle of equal treatment and combating discrimination.

(b) Within the organization where the work was performed, as specified below in section 2.2 of this Policy.

(c) Before the National Transparency Authority (NTA), provided that a complaint has already been submitted to the competent authorities and entities specified in (a) and (b) above and that no action has been taken by the responsible bodies within three months from the date of submission. In such cases, the NTA shall exercise its powers as described in sections 2.3 and 2.4 of this Policy.

4.2. Complaints regarding incidents of violence and harassment shall be submitted to the competent supervisor of the organization responsible for personnel matters.

4.3. Complaints shall be submitted under a confidential protocol to the Secretariat Office of the FESTIVAL (Olympion Building, 6th floor, 10 Aristotelous Square, Thessaloniki). The competent supervisor is obliged to immediately, and no later than five (5) working days from the receipt of the complaint, assess the validity of the allegations and summon the accused for explanations, as well as any other person who, based on the complaint or the accused's statements, was aware of or witnessed the incident of violence or harassment. If

the findings of this investigation establish disciplinary liability on the part of the accused, the report shall be immediately forwarded, and no later than within an exclusive deadline of three (3) days, to the General Director, who serves as the competent disciplinary supervisor of the accused, for further action within the framework of disciplinary procedures.

4.4. The National Transparency Authority (NTA) shall also investigate any disciplinary liability of the body before which the complaint was submitted, in cases where there was an unjustified delay in the examination of the complaint, except in cases where the complaint was submitted before the Greek Ombudsman.

4.5. The FESTIVAL ensures that the investigation and examination of complaints shall be conducted with impartiality, while safeguarding the confidentiality and personal data of both victims and accused individuals. Furthermore, the competent bodies before which complaints are submitted shall perform their duties with integrity, objectivity, and impartiality in handling complaints, strictly observing confidentiality obligations. They must also refrain from managing specific cases by declaring a conflict of interest whenever a situation of conflict of interest arises.

4.6. If it is determined that the designated authorities responsible for receiving complaints have a conflict of interest in handling a specific complaint, the complaint shall be immediately forwarded to the Greek Ombudsman.

4.7. The affected individual who has submitted the complaint shall be immediately informed by the competent authorities handling the case regarding the progress of the complaint's examination or its possible referral to another competent authority or body, in accordance with the provisions of the preceding paragraphs.

5. Protection Measures

5.1. When the accused individual violates the prohibition of violence and harassment in the workplace, the FESTIVAL, upon becoming aware of the violation, shall take the necessary, appropriate, and proportionate measures, as applicable in each case, against the accused in order to prevent the recurrence of a similar incident or behavior, even during the investigation of the relevant complaint.

5.2. These measures may include: a compliance recommendation, reassignment to another organizational unit, relocation to a different workplace, or modification of working hours. Additionally, they may involve removal from the workplace through the mandatory granting of regular leave or compensatory leave, provided the individual has remaining leave balance. Further measures include investigating potential disciplinary liability, initiating disciplinary proceedings, and imposing disciplinary sanctions in accordance with applicable legal provisions, or terminating the employment or engagement contract, in cases where such termination is legally permissible based on the accused's employment relationship, subject to the prohibition of abuse of rights under Article 281 of the Greek Civil Code. The measures of reassignment, workplace relocation, or modification of working hours may also be applied to the affected individual, upon submission of a relevant request. In such cases, the Service is obliged to prioritize the examination of the request.

5.3. Any individual covered under the Scope of Application who experiences an incident of violence or harassment has the right to be justifiably absent from the workplace for a reasonable period, not exceeding three (3) working days, without loss of salary or any other adverse consequence, provided that they have a reasonable belief that there is an imminent serious risk to their life, health, or safety, particularly when the perpetrator of such behavior is the direct supervisor of the affected individual, or when, despite the submission of a complaint, the necessary and appropriate measures referenced in paragraph 2 have not been implemented to restore the normal functioning of the Service, or when those measures are inadequate to stop the violent or harassing behavior.

5.4. In the aforementioned case, the departing individual is required to inform the General Director of the FESTIVAL in writing, reporting the incident of violence or harassment and the facts that substantiate their belief that a serious risk to their life, health, or safety is imminent. If the risk does not exist or has ceased to exist, or if the Service has implemented the necessary measures outlined in paragraph 3.2, and the individual refuses to return to the workplace, their absence shall no longer be considered justified.

6. Prohibition of Retaliation Against the Affected Individual

The FESTIVAL ensures that no adverse treatment shall be imposed on the affected individual if such treatment constitutes an excessive and unjustified measure or countermeasure against them due to the submission of a complaint regarding an incident of violence or harassment. The FESTIVAL shall not take retaliatory action against the employee/complainant as a result of or in connection with their complaint. It shall not proceed with the termination or dissolution of their employment relationship in any manner, nor shall it engage in any other adverse treatment against the complainant due to retaliatory behavior arising from the employee's refusal to submit to sexual or other harassment, or as a countermeasure for protesting, reporting, testifying, or engaging in any other action before a court or other authority related to the implementation of this Policy.

7. Consequences of Violating This Policy

If it is determined that an employee or any other individual engaged with the FESTIVAL under a different form of employment relationship has violated the prohibition of violence and harassment, the FESTIVAL shall take the necessary, appropriate, and proportionate measures against them, as applicable in each case, in order to prevent and deter the recurrence of a similar incident or behavior. These measures may include: (a) A compliance recommendation. (b) The imposition of a disciplinary sanction, in accordance with the relevant provisions of the Regulations on Operations/Employment, as currently in force. (c) Reassignment, modification of working hours, location, or method of work performance, on either a temporary or permanent basis. (d) Termination of the employment or cooperation relationship, subject to the prohibition of abuse of rights under Article 281 of the Greek Civil Code. Furthermore, in cases where a complaint is determined to have been maliciously submitted, the FESTIVAL reserves the right to take any lawful measures against the complainant, within the framework of their employment or cooperation contract and applicable legislation. Specifically, the provisions concerning disciplinary offenses, disciplinary procedures, and disciplinary sanctions in the context of or following complaints regarding workplace violence and harassment form an integral part of the FESTIVAL's Regulations on Operations.

8. Cooperation and Provision of Relevant Information to Competent Authorities Upon Request

The FESTIVAL, the designated contact person, and any other individual responsible for receiving and handling complaints of violence or harassment shall cooperate with any competent public, administrative, or judicial authority that, either ex officio or following a request submitted by an affected individual within its jurisdiction, requests the provision of data or information. They are obligated to provide assistance and grant access to the requested information. To this end, any data collected, in any form, shall be kept in a dedicated file, in compliance with the applicable legislation on personal data protection.

PART D – FINAL PROVISIONS

This Policy shall be communicated to all employees of the FESTIVAL by all appropriate means and shall be posted in the workplace and on the website www.filmfestival.gr. This Policy may be updated from time to time at the discretion of the FESTIVAL, including in cases where there are changes in the details of the designated competent persons.

