

# Policy against Violence and Harassment in Workplace

## A. Prevention and Elimination of Violence and Harassment in the Workplace

### 1. Overview: Purpose

The respect for human dignity, at all levels, is a key element of Eurobank's Code of Conduct. Eurobank, is committed to provide a workplace that protects the health and safety of its employees, at every location where it conducts its business.

All employees, regardless of the nature of their employment status, are obliged to comport themselves properly while at work, showing empathy and respect for the personality of others. **The Bank applies a policy of zero tolerance to any form of violence and harassment that occurs at work or is work-related**, including gender-based violence and harassment, and expresses its commitment to address and eliminate such incidents. Any form of violence and harassment is absolutely prohibited for all Bank employees, regardless of the nature of their employment status, aiming to a place of work where respect for human dignity is the rule.

The objective of the Policy, is to define a framework on how to prevent, properly address and eliminate workplace violence and harassment.

### 2. Scope

The Policy is applicable to:

- all members of Eurobank's staff having an employment contract of any type (permanent or temporary, fixed-term or open-ended)
- the persons occupied under a project contract, independent services, and salaried mandate
- employees contracted by third-party service providers
- persons attending training programs, including interns, apprentices, and volunteers
- members of Eurobank's staff with an expired work contract
- candidates seeking employment with the Bank

Forms of violent behavior and harassment, may occur, especially:

- at workplace, including all common areas or private rooms, all locations where employment-related business is conducted, lunchrooms or breakrooms, restrooms, locker rooms, and all types of accommodation paid by the employer
- during transport to and from work, during travelling for business or training reasons, as well as during other corporate functions and social events related to business
- during telephone conversations, including calls implemented via IT technologies and applications

### 3. Preventive and Protective Measures - Awareness Campaigns

The Bank's measures and actions taken to prevent, control, mitigate and address workplace violence and harassment risks, as well as the ways to monitor incidents or behaviors of that nature, particularly include the following:

Communicate this Policy on the Bank's official Website and Intranet

- Personnel Awareness and Education
- Psychological Support Line
- Informal actions to address workplace violence or harassment

## **Obligation not to Obstruct Adherence to Policy**

No staff member, including persons exercising managerial rights, is allowed to prevent/impede another person from exercising their rights and from adhering to the obligations stemming from this Policy.

## **B. Internal Reporting concerning Incidents of Violence and Harassment in the Workplace**

### **1. Submission of internal Grievance/Complaint**

Any person who believes he or she has been subjected to violence and/or harassment in the workplace, as well as any person who becomes aware of incidents of workplace violence and/or harassment, in breach of this Policy, may file a written grievance/complaint of the incident, choosing among the available communication channels.

The Bank encourages the affected persons to keep a record of all harassment incidents, documenting the actions they have taken to stop them, as well the details regarding previous requests they might have made, asking for help.

### **2. Grievance/ Complaint Investigation**

The Bank's Human Resources General Division, in cooperation with the Group Compliance General Division and the Internal Audit Group General Division, examines the submitted grievance/complaint and launches a prompt, thorough and impartial investigation, ensuring confidentiality and protection of the personal data of those involved, following the relevant procedure.

### **3. Decision Procedure for Disciplinary Measures against the Respondent**

The decision to establish or not, disciplinary measures against the respondent is taken by the Committee against Workplace Violence and Harassment.

### **4. Sanctions/ Disciplinary Measures against the Respondent**

If the investigation confirms, fully or partially, the complaint and the violation of our Policy against Workplace Violence and Harassment, the Committee takes necessary, suitable, and proportionate measures on an ad hoc basis against the respondent to prevent any similar incident or conduct from recurring.

### **5. Prohibit Retaliation against Complainant**

The Bank will never impose any retaliatory measures, nor will it allow any form of retaliation, against anyone who brings a complaint alleging a violation of our Policy against Workplace Violence and Harassment. However, the above is not intended to protect persons who intentionally submit false or even malicious complaints, as in such cases, the Bank may, upon investigation by the Committee against Workplace Violence and Harassment, at its fair discretion in the exercise of its managerial right, proceed to impose sanctions against the above persons, not excluding even the termination of the employment contract or cooperation.

### **6. Grievance/ Complaint submission by Third Parties**

The Bank, through its website, also encourages any third party, other than its employees, to report any violation of policies, procedures and applicable laws related to violence and harassment issues, as well as any attempt to cover up the above.