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**Policy for the Prevention and Combat of Violence and
Harassment at Work**
Internal Complaints Handling Procedure

B' edition
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Table of contents

.....	1
PART A: Policy for the Prevention and Combat of Violence and Harassment at Work (Article 9 N 4808/2021)	3
1. Purpose	3
2. Scope	3
3. Zero Tolerance Declaration for Violence and Harassment	3
4. Risk Assessment	4
5. Violations of this Policy	4
6. Measures for the Prevention, Control, and Mitigation of Risks – Awareness and Sensitization Actions.....	5
7. Reporting, Investigating, and Addressing Complaints	6
8. Malicious Complaints	7
9. Support for Employees Who Are Victims of Domestic Violence	8
10. General Information – Contact Person	8
PART B: Internal Procedure for Handling Complaints of Violence and Harassment (Article 10 of Law 4808/2021)	
1. Purpose	8
2. Definitions	9
3. Internal Complaints Channels	10
4. Guidelines for Submitting Internal Complaints	10
5. Responsibilities of the Internal Complaints Management Committee (ICMC)	10
6. Protection of Complainants	11
7. Rights of Complainants and Those Involved in the Complaint	12
8. Investigation of Incidents.....	12
9. Consequences Upon Confirmation of Violations	13
10. Confidentiality – Anonymity.....	13
11. Malicious Complaints	13
12. Record Keeping	14
13. Personal Data	14
14. Policy Awareness	14
15. Cooperation with Authorities.....	15
Table of changes to the present policy	
ANNEX A: Complaints Register	16

**PART A: Policy for the Prevention and Combat of Violence and Harassment at Work
(Article 9, Law 4808/2021)**

1. Purpose

The purpose of this Policy is to create and establish an environment within ProGnosis Biotech SA (hereinafter referred to as the "Company") that respects, promotes, and ensures human dignity, prevents and combats all forms of violence and harassment that occur during work, whether related to or arising from it, including gender-based violence and harassment, as well as sexual harassment.

2. Scope

This Policy applies to the management, staff, and employees of the Company, regardless of the employment status (e.g., fixed-term or indefinite contracts, part-time or temporary work, service contracts, third-party service providers, etc.), as well as interns or trainees at the Company, former employees, job applicants, and individuals interacting or collaborating with the Company.

3. Zero Tolerance Declaration for Violence and Harassment

The Company declares its commitment to addressing and eliminating incidents of violence and harassment in the workplace, with the aim of respecting and protecting human dignity.

In this context, the Company demonstrates zero tolerance for any form of violence and harassment. It adopts and implements all provisions of the relevant legislation (Laws 4808/2021, 3580/2010, and other legislative/regulatory provisions) as applicable. The Company is committed to receiving, investigating, and managing every complaint or report with confidentiality and respect for human dignity, in accordance with its adopted management policy. It also undertakes to assist any competent public, administrative, or judicial authority in the investigation of any incident of violence or harassment, if requested.

For employees or individuals associated with the Company who violate their obligations arising from this policy or the law, the Company will take the necessary and appropriate measures, on a case-by-case basis, to prevent recurrence and, to the extent possible, mitigate the consequences of such incidents.

4. Risk Assessment

In accordance with Article 42, paragraph 6, case (h) of Law 3850/2010, as added in the Article 7 of Law 4808/2021, the Employer is obliged to assess psychosocial risks, including risks of violence and harassment, including sexual harassment, and to take measures to prevent, control, and mitigate them. In this context, the Company will take appropriate investigative measures, and the findings will be evaluated by the Company's management to implement the necessary preventive, control, and mitigation measures for these psychosocial risks across various departments and units of the Company.

5. Violations of this Policy

The Company employs and collaborates with individuals without considering any criteria beyond purely qualitative and meritocratic factors related to work or service. Incidents of violence and harassment may occur both within the Company's premises (work, auxiliary, hygiene, and care spaces, etc.) and outside them (e.g., during business trips, events, or social activities related to the Company), as well as in any form of communication (including through information technology) related to work.

Indicative violations of this Policy and the Law include, but are not limited to:

- a. Insulting, derogatory, sexist, or racist comments
- b. Derogatory/insulting remarks about one's appearance, physical weaknesses, or character
- c. Verbal or physical aggressive behavior, rude gestures, touches, and any form of unwanted and non-consensual physical contact or attempt thereof
- d. Sending or publishing messages, comments, or photos by any means, digital or otherwise, that harm the personality or insult the dignity and reputation of the recipient or the person concerned, including edited photos and the use of A.I. technologies
- e. Offensive questions or comments or spreading rumors regarding personal data, sexual interests or preferences, gender, race or ethnicity, cultural identity, religious or other beliefs
- f. Proposals or insinuations for career advancement in exchange for any form of sexual favor or negative career consequences in the event of refusal.

The above indicative violations concern this policy insofar as they occur during, are related to, or arise from work, and take place in the broader workspace, during professional trips, training, events, or social activities related to work, as well as through

communications related to work, including those carried out using information and communication technologies.

6. Measures for the Prevention, Control, and Mitigation of Risks – Awareness and Sensitization Actions

The Company ensures a workplace that is accessible, safe, and friendly, where relationships among employees, collaborators, management, and members of the Company are governed by respect for human dignity and diversity, a spirit of cooperation and mutual assistance, professionalism, and mutual respect.

In line with its policies and organizational structure, the Company encourages communication between employees and their direct supervisors, colleagues, and management. As appropriate, it undertakes actions such as posting flyers in the workplace and distributing printed or digital materials to combat violence and harassment, ensuring that everyone is aware of the policy and procedures adopted for incidents of violence and harassment and knows where to seek help if needed. In this context, the Company provides training activities for its workforce through suitable seminars (either internally or in collaboration with external specialized partners) regarding the recognition and handling of incidents of violence and harassment and offers the necessary support to its staff and collaborators.

The Company encourages its employees and anyone connected to it in any way to report incidents of violence and harassment in the workplace, of which they may be witnesses. The Department of Financial Management and Human Resources evaluates the effectiveness of the implemented measures and practices every two years and proposes updates/changes to management based on a revised risk assessment.

7. Reporting, Investigating, and Addressing Complaints

If any employee of the Company or third party connected to it in any way believes they have been subjected to violence or harassment, or if they observe such behavior in the workplace, they must report the incident immediately, following the procedure described in Part B of this document [Internal Complaint Management Procedure for Incidents of Violence and Harassment (Article 10, Law 4808/2021)].

The Company will conduct a fair, timely, thorough, and objective investigation through its competent bodies, following the appropriate procedures for all parties involved, and will reach reasonable conclusions based on the collected evidence. The Company expects

full cooperation from employees or third parties connected to it in any investigation conducted for complaints regarding violence, harassment, or retaliation. The Company will maintain strict confidentiality regarding the investigation, to the extent possible and as permitted by applicable law. Upon completing the investigation, it will communicate the results to the parties involved as far as feasible and appropriate in each case.

Any form of retaliation by any employee or third party connected to the Company against another employee or third party who opposes violence or any form of harassment, files a complaint, provides testimony, assists, or participates in any investigation process is strictly prohibited.

If any employee or third party connected to the Company believes they have been subjected to retaliatory behavior due to submitting a complaint or assisting in the investigation of incidents of violence or harassment, they must follow the procedure described in the relevant Management Procedure (Part B of this document) to report the incident.

Complaints regarding behaviors that violate this policy will be promptly and thoroughly investigated.

An individual who in good faith and reasonably believes they have been affected by an incident of violence or harassment during employment, during the employment relationship, or even if the contract or relationship in which the incident or behavior is alleged to have occurred has ended, retains all rights to: a) Lodge a complaint and request the resolution of a labor dispute with the Labor Inspectorate within its legal competencies,

b) Report the incident to the Ombudsman within the scope of its responsibilities, and
c) Seek any judicial protection and take legal action in the competent courts.

To ensure workplace safety and the integrity of investigations, the Company may, among other actions, relocate employees or modify their work hours pending the outcome of the investigation. During this period, partial or full access to buildings or facilities may be restricted for those involved.

If the investigation determines that an incident of violence, harassment, or retaliation has occurred, the Company will take appropriate corrective, disciplinary, or other actions against the offender.

These actions may include (indicative but not exhaustive): (a) Disciplinary sanctions in accordance with the Work Regulations and the Law,

- (b) Changes in position, working hours, location, or method of work,
- (c) Termination of the employment or collaboration contract,
- (d) Legal actions.

The offender may also bear criminal or civil liability under applicable law.

8. Malicious Complaints

Given the serious consequences that the accused may face, complainants are strictly obliged to adhere to the duty of truth without this being seen as a deterrent to filing complaints. Complaints that are proven to be blatantly malicious and unfounded will be further investigated at the Company's discretion, both in terms of motives and the parties involved, to restore order by any legal means, including the actions mentioned indicatively in the previous article.

9. Support for Employees Who Are Victims of Domestic Violence

Within the framework of the Law and its capabilities, the Company takes every appropriate measure and makes any reasonable adjustment to working conditions to protect the employment and support its employees who are victims of domestic violence.

10. General Information – Contact Person

All questions related to the implementation or interpretation of this Policy should be directed to the Department of Financial Management and Human Resources. The head of the Department of Financial Management and Human Resources is designated as the responsible person (Contact Person) for informing and providing guidance to employees, whether or not they are addressing an incident or complaint related to violence and harassment, as well as for matters concerning the prevention and handling of violence and harassment in the workplace.

PART B: Internal Procedure for Handling Complaints of Violence and Harassment (Article 10 of Law 4808/2021)

1. Purpose

The purpose of this Procedure is to define the process for receiving and reviewing complaints of incidents of violence and harassment as defined by Articles 3 and 4 of Law

4808/2021. Specifically: a) To establish the principles and framework for managing internal complaints. b) To encourage those covered by this policy to take appropriate action if they experience or witness incidents of violence and harassment, including gender-based violence and harassment and sexual harassment.

2. Definitions

- **Internal Complaint:** A written report and provision of information to the Company (either anonymously or with identification) regarding incidents of violence and harassment that occurred in the context of work provided to the Company or on the occasion of such work.
- **Unacceptable Complaint:** A complaint that does not concern incidents of violence and harassment as defined by the Law, or that is not clear, specific, complete, timely (as defined below), or is manifestly malicious, frivolous, or excessive.
- **Complainant:** The person who reports or discloses information regarding incidents of violence and harassment, either as a victim or as a third party, in the context of their employment or in any kind of cooperation with the company.
- **Retaliation:** Any direct or indirect action or omission that takes place on the occasion and as a result of an internal complaint and which causes or may cause unjustified harm to the complainant.
- **Internal Complaints Management Committee (ICMC):** A three-member committee responsible for handling and investigating internal complaints. It consists of: a) the Responsible for Receiving and Monitoring Reports (RRMR), b) the Data Protection Officer (DPO), and c) an administrative employee of the Company, appointed by the Company's Board of Directors (BoD). If any of the members of the ICMC is involved in the complaint in any way, the BoD decides on their replacement, either by a company executive or a third party, who guarantees independence with respect to the persons involved in the complaint.
- **Internal Complaints Channels:** The channels through which internal complaints are submitted, including the means used for submitting complaints and the individuals to whom complainants can address.

- **Malicious Complaint:** A complaint knowingly made by the complainant that is false and not genuinely aimed at protecting their rights or legitimate interests or those of a third party, but at causing unjust harm to the accused.
- **Special category personal data:** Personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data for the purpose of uniquely identifying a person, data concerning health, or data concerning a person's sexual life or sexual orientation.

3. Internal Complaints Channels

Any internal complaint, whether anonymous or named, can be submitted through the following channels:

- **Email:** Send to antiviolence@prognosis-biotech.com, addressed to the head of the Financial Management and Human Resources Department and the RRMR (if they are a different person).
- **By post or courier:** Address to Odos Farsalon 153, Larissa, Postal Code 41335, marked as "CONFIDENTIAL, attention to the head of the Financial Management and Human Resources Department as RRMR."

4. Guidelines for Submitting Internal Complaints

a) The complaint must be submitted in writing, either anonymously or with identification.
 b) The complaint should be made in good faith and without delay, as soon as the incident of violence or harassment is noticed. In any case, if the complaint is delayed for more than three months from the reported incident, it will be considered unacceptable unless otherwise decided by the ICMC with a relevant decision.
 c) The complaint must be clear, specific, and contain as much information and detail as possible to facilitate its investigation. Specifically, it must include at a minimum the name of the person(s) who may have committed the act of violence or harassment, the date/time period and place where the act took place, and a detailed description of it.
 d) Special category personal data and other sensitive information not related to the act of violence or harassment should not be included in the complaint. If they are, they will not be considered.
 e) In the case of a named complaint, the complainant must be available to provide further information if requested.

5. Responsibilities of the Internal Complaints Management Committee (ICMC)

Upon receiving the complaint as described above, the CEOs and the head of the Company's Legal Department are informed, who then convene the ICMC within a necessary time frame. The ICMC has the following responsibilities:

- Reviews the admissibility of the complaints submitted.
- Evaluates and prioritizes the complaints for investigation.
- Contacts the complainant (in the case of a named complaint) to gather any necessary clarifications and/or evidence.
- Takes all appropriate measures to protect the personal data of the individuals involved in the complaints.
- Maintains a Register of Complaints and related files for each case, in collaboration with the Company's Legal Department.

6. Protection of Complainants

The Company protects any person who, in good faith, reports incidents of violence and harassment. In this context, any form of negative behavior towards anyone who has filed an internal complaint is prohibited, even if the complaint is later found to be incorrect. The ICMC (Internal Complaints Management Committee) and the Company's Management ensure that no retaliatory actions occur against anyone who, in good faith, reports incidents of violence and harassment. Specifically, the Company is committed to ensuring that individuals who have submitted internal complaints do not face retaliation, harassment, marginalization, intimidation, threats, or unjust treatment as a result of their complaint (e.g., dismissal, unfounded negative evaluations, denial of leave, exclusion from training seminars, rejection of expenses, etc.). Furthermore, unjustified changes to their employment contract are not permitted (e.g., suspension, demotion, denial of promotion, salary reduction, change of workplace, reassignment, change of duties, shift schedule modification, etc.). The same level of protection applies to third parties connected to the complainants or to the reported behaviors who could suffer retaliation within the work environment, such as colleagues or relatives of the complainants. In cases of clearly malicious and unsubstantiated internal complaints, the complainant will be subject to the provisions outlined in the Company's Policy for the Prevention

and Combatting of Violence and Harassment (Part A of this document), as well as the Company's Work Regulations. If the complainant is an external partner or a member of the partner's staff, premature termination or cancellation of the partnership as a result of the complaint is not permitted. Any act of retaliation must be immediately reported to the RRMR (Responsible for Receiving and Monitoring Reports) or a CEO by the affected individual. The ICMC will then address the issue, investigate it, and resolve it. If the investigation confirms retaliation, appropriate measures will be taken against the perpetrator. The accused will bear the burden of proving that their actions were not related to the complaint made by the complainant (reversal of the burden of proof). If the complainant expresses the desire for special protection from possible retaliation (e.g., transfer to another department or shift), the Company will consider the feasibility of granting such a request based on its current capabilities.

7. Rights of Complainants and Those Involved in the Complaint

A named complainant has the right to be informed by the ICMC of the receipt of their complaint (within 7 working days at the latest) and of the outcome of the investigation (within one month at the latest). The complainant will be informed by a member of the ICMC, using whatever method the ICMC deems most appropriate and effective.

The Company protects both the individuals who submit complaints and those involved in complaints. The investigation is conducted with absolute confidentiality, and privacy is maintained at every stage of the process to the extent possible, in order to avoid stigmatization and the "victimization" of individuals. Members of the ICMC sign and submit a confidentiality statement to the Company, which remains valid even after their membership in the ICMC ends or their relationship with the Company is terminated. Any person accused has the right to be informed, within a reasonable timeframe, of the alleged misconduct and the individuals managing the data contained in the complaints. However, if the ICMC determines that there is a significant risk that this notification could hinder the investigation or the collection of necessary evidence, the notification may be delayed until this risk no longer exists.

8. Investigation of Incidents

The Company is committed to handling every complaint, whether named or anonymous, with due diligence. The ICMC conducts an investigation into the incidents mentioned in the complaint as soon as possible. Where necessary and depending on the content of the complaint, additional professional and specialized support from other Company executives or external partners may be sought.

9. Consequences Upon Confirmation of Violations

Depending on the results of the investigation, once the validity of the complaint is established and the severity of the reported act is assessed, the ICMC (Internal Complaints Management Committee) proposes corrective, disciplinary, or other actions. These actions may include (indicatively but not limited to): (a) warnings, (b) disciplinary sanctions, (c) change of position, working hours, location, or manner of work, (d) termination of the employment contract or cooperation agreement of the person accused, (e) legal actions. The ICMC's proposal is brought to the attention of the Board of Directors, which makes a final decision on the matter.

10. Confidentiality – Anonymity

The Company commits to making every effort and taking all appropriate measures to protect the identity of both the complainant and the individuals mentioned in the complaints in any capacity. The Company will handle each case with full confidentiality and discretion, to the extent that this is feasible. In the case of a named complaint, the identity of the complainant will not be disclosed to anyone other than the authorized persons responsible for receiving, monitoring, and investigating complaints—namely, the members of the ICMC and any specialized external consultants or other Company executives specifically involved in investigating a particular incident, to the extent necessary. Exceptionally, in the case of a named complaint, the identity of the complainant may be revealed if: A. The complainant consents, to the extent relevant to their consent. B. Disclosure is required by law. C. The complaint is proven to be malicious and clearly intentional. D. Disclosure of the identity is deemed necessary to prevent or mitigate a threat to the safety of the Company's workforce, based on the recommendation of the ICMC and the decision of the Company's Board of Directors.

11. Malicious Complaints

If a complaint is proven to be false and malicious, and the accused requests in writing to the ICMC, they may be informed of the identity of the complainant (if known to the ICMC) in order to exercise their legal rights. Complaints that are found to be clearly malicious will be further investigated at the Company's discretion, both in terms of the motives and the parties involved, to restore order through all legal means and as outlined in Article 9 of this Procedure.

12. Record Keeping

The ICMC (Internal Complaints Management Committee) maintains a Complaint Register, either in electronic or printed form, in accordance with the provisions of national and European data protection laws. A sample Complaint Register is attached as Annex A of this policy.

13. Personal Data

All personal data processing under this policy and procedure is carried out in compliance with the applicable national and European data protection laws, as well as the Company's data protection policy. The personal data of all individuals involved are protected and processed exclusively in relation to the specific complaint, with the purpose of determining the validity of the complaint, investigating the incident, and taking the actions required by law, Company regulations, and policies.

The Company takes all necessary technical and organizational measures to protect personal data, as per its data protection policy. Sensitive personal data or other information that is not directly related to the complaint is disregarded and deleted.

Access to personal data included in complaints is restricted to those involved in the management and investigation of the incident, namely the ICMC members, including any specialized external consultants and other Company personnel specifically assigned to investigate a particular case. If deemed necessary by the ICMC, the Company's Board of Directors may also have access to the data.

The personal data associated with the complaint are deleted within a reasonable timeframe following the completion of the investigation and, in any case, after a five-year period from their collection for the specific purpose, unless a legal obligation requires otherwise.

14. Policy Awareness

The Finance and Human Resources Department ensures that all employees of the Company are informed about the content of this Policy and Procedure. The information is provided via distribution of informative materials, email, or other appropriate methods, depending on the employee category.

15. Cooperation with Authorities

The Company ensures and commits to cooperating and providing any relevant information and data to any competent authority, whether public, administrative, or judicial, either on its own initiative or upon request from an affected individual, as part of its official duties. To this end, any data collected in any form is maintained in a relevant file for a reasonable period, in compliance with the provisions of Law 4624/2019.

Table of changes to the present policy

Edition	Date	Description of Changes
1.0	15/9/2021	A' Edition
2.0	12.1.2024	B' Edition

ANNEX A

COMPLAINS REGISTER

Incident of Violence and/or Harassment	Date of complaint / means of submitting the complaint	Named or anonymous complaint	Brief description of the background	Submission to the ICMC → ICMC's proposal	Results / Findings / Determination of Violation or Not / Imposition of Sanctions	Notification (as applicable) to other authorities (Independent Authorities, judicial authorities, etc.)	Case progress before other authorities / final report

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