

Version 1.1

G.E.P

EQUALITY AND DIVERSITY POLICY

Policy against Employees' Violence
and Harassment

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Equality and diversity policy

Policy against employees' violence and harassment

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Article 1: Introduction

The Institute of Entrepreneurship Development and its social partners wish to develop a dialogue in the field of social responsibility and, specifically, to promote equality at workplace for all employees and intensify prevention and to address all forms of violence and harassment at workplace. IED's social responsibility policy responds to the need for solidarity and effective human resources' management at all levels. The promotion of equal opportunities, equal treatment and diversity of employees is considered imperative for IED, in the context of its function as a partner in EU projects and actions.

The Institute of Entrepreneurship Development confirms its commitment to general principles regarding the equal opportunities over the long term and the rejection of all forms of violence. In this context, IED undertakes to promote and launch actions that support diversity at multiple levels, the upward mobility of its staff and the prevention of all forms of violence and harassment at workplace, which are indicators that IED is working closely with society.

Institute of Entrepreneurship Development takes into account the following:

- Gender equality is a fundamental human right, recognized both internationally and throughout the European Union.
- Gender equality is one of the five values underpinning the European Union, which is obliged to integrate it into all its activities.
- The main goals and objectives of the European Commission's Gender Equality Strategy 2020-2025.
- The Charter of Fundamental Human Rights which promotes equality and prohibits all sexual discrimination.
- The requirements for preventing and responding to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, as defined by the national Greek legislation with the law by number 4808/2021.

IED recognizes that National and European rights prohibiting sexual discrimination and encouraging equal treatment in employment, including equal wages for women and men for equivalent work or work of equivalent value, and the commitment made by EU institutions and organizations and trade unions at all levels for establishing equality between women and men, have contributed both to increasing the number of women in the labor market, in order to guarantee better quality of education and for increasing the number of women in the labor market.

We recognize, however, that unfortunately the gender pay gap persists in many sectors of the economy, and in the EU labor market, women are sometimes over-represented in lower paid sectors and under-represented in decision-making positions. In addition, IED's long experience in managing and participating in employment promotion, adult education, social inequality eradication, refugee integration and other projects provided us with additional knowledge and a broader understanding of work and professional opportunities in EU countries.

Therefore, IED's management considers necessary to undertake further action, as stated in the EU strategy, on gender equality, in particular with regard to equal pay and women's

access to decision-making positions, but also to combat gender-based violence. IED's workplace equality policy is based on three key factors:

- combating discrimination to achieve equal opportunities and treatment
- promoting diversity as a source of wealth for the company.
- Preventing and detrending incidents of gender-based violence and harassment and sexual harassment.

The present policy was designed, based on the above pillars, which expresses the dominant perception of iED's administration department, which is the following: equality at workplace not only contributes to the economic and social performance of the Institute of Entrepreneurship Development, but also improves cohesion and contributes to changing attitudes in society as a whole.

This Policy applies to the Institute of Entrepreneurship Development, and its branches in Cyprus and EU, as well as to consortia/partnerships in which it holds more than 30 % of the shares, subject to the dominant influence criterion.

Article 2: Policy for Equality and Diversity. Employees' Policy against Violence and Harassment

Chapter 1 - Equality Policy

iED recognizes that diversity and inclusion help to support creativity and innovation: they are an essential component of a successful organization. The Administration Department of Institute of Entrepreneurship Development is committed to encouraging diversity and inclusion and ensuring that there is no discrimination in our company. We want our staff and our partners to truly represent the diversity of society. We want to be an organization in which every employee and freelancer feels respected and able to perform to their highest potential.

To this end, this policy provides a framework of equality and fairness for everyone in our activities and at iED workplaces. It expresses our commitment to avoid discrimination on the basis of age, disability, gender, gender reassignment, marital status (including civil partnerships), race, ethnic origin, skin color, nationality, religion or belief, or sexual orientation. Furthermore, the scope of this equality policy is extended to include people with limited opportunities, socially excluded people and people with special needs who are under-represented in the modern working environment. A key aspect of equality policy is, of course, the employees' gender, as the main field of reference. This policy applies to employees and freelancers/external employees and to people working inside and outside of iED's premises.

The purpose of this Policy is to set out the conditions required to reduce and unjustified disputes that may exist and therefore achieve the following:

- equal opportunities for women and men,
- equal wage for male and female employees, taking into account all aspects of working conditions,
- a better work-life balance for both male and female employees.

Therefore, the Institute of Entrepreneurship Development is committed to maintaining a consistent and honest attitude and behavior on issues related to equality and diversity. The Administration Department clearly encourages all iED departments and working groups to ensure that the composition of human resources to express the variety existing in society in order to achieve greater diversity. This part includes women, obviously, who despite their developing role in the professional sector, are generally under-represented at senior management levels in our country and the EU. At iED, during our 17 years of operation, we have succeeded in maintaining Employee and Staff ratios and indicators in various areas that differentiate us positively from the average in the services sector. Our main strategy is continuous improvement through the implementation of action plans, as outlined in this Policy to combat stereotypes and promote equality between all men and women and people belonging to special groups, within the Institute and in the cooperative and partnership schemes in which we participate in the implementation of European projects.

All partners, volunteers and employees, whether part-time, full-time or temporary, will be treated fairly and with respect at iED. The recruitment choice, whether as an iED staff member or as a freelancer/external contractor, will be based on the professional competence, level of education, skills and qualifications of each candidate. Access to promotion opportunities, training or any other benefit will also be based on the individual's competences and skills. All employees will be encouraged to develop their potential and talents, and resources of the workforce will be fully utilized to maximize the creativity and success of the company.

We, as iED's Administration Department:

- We actively seek to increase the number of people we work with, who come from groups/communities underrepresented in entrepreneurship and education, or in particular job roles in our industry. Emphasis is placed on recruitment and selection of new staff, with preferential recruitment of under-represented groups, usually women and/or people with disabilities.
- We ensure wage and benefit structures, with policies aimed at achieving gender equality that incorporate all issues related to anti-discrimination. Additionally, in conjunction with equal wage, we ensure that the phenomenon known as the 'glass ceiling' ceases to exist and is replaced by career progression for women at the same level as that of men, i.e., based solely on their professional skills.
- We examine and review all formal and informal employment/recruitment practices and procedures to ensure they are fair and help us identify the best talent, without discrimination or segregation.
- We identify and seize opportunities to increase the diversity of individuals in shaping and making decisions at management and operational level.
- We make reasonable adjustments to the workplace and work organization to enable people with special skills and/or special needs to work in or with our company.
- We actively seek to increase diversity in our networks and recruitment 'pools'.
- We maintain working conditions and a working environment in which individual differences and the contributions of all our staff and external partners are recognized and valued. We regularly review the organization and flexibility of work based on the needs of our staff members.
- We ensure that every employee and external partner is able to work in an environment that promotes dignity and respect for all. We will not tolerate any form of bullying, intimidation or harassment.
- We ensure that all staff members have opportunities for training, development and upscaling. Emphasis will be placed on promoting and developing the careers of under-represented groups in our industry, usually women. We continuously invest in the organization of personal and professional development policies (including skills assessment and mentoring).
- We design and implement various family-friendly measures to better reconcile work and family life, better work-life balance for employees. These may include provisions on parental, maternity, childcare and other types of family leave, specific working time arrangements (organization of part-time work, job sharing, etc.) and childcare arrangements.
- We have put in place programs, action plans and good practice rules to ensure equality and enhance diversity which are reflected in measurable objectives, which are listed in Chapter 3 (Annex). These targets are monitored periodically and reviewed in terms of timescales and achievement.

Chapter 2 - Policy against Employees' Violence and Harassment

The Institute of Entrepreneurship Development complies with all measures and obligations relating to the implementation of the provisions of Part II of Law 4808/2021, to prevent and respond to all forms of violence and harassment, including gender-based violence and harassment and sexual harassment. The purpose of this policy is to create and consolidate a working environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment. iED declares that the right of every employee to a work environment free of violence and harassment is recognized and respected and that it will not tolerate any such behavior, in any form, by any person. For this reason, iED:

- has carried out a systematic assessment of the risks of violence and harassment at work,
- has designed measures to prevent, control, mitigate and address such risks and to monitor such incidents or patterns of behavior,
- has applied a documented Procedure for receiving and examining complaints,
- has implemented information and awareness-raising activities for staff.

This policy is adopted in accordance with Articles 9 and 10 of Law. 4808/2021 and the regulations made pursuant thereto and shall include the persons referred to in par. 1 of Article 3 of Law 4808/2021.

Chapter 3 - Validation - Monitoring and Control – Sanctions

This document is prepared by the Governance & Internal Policies Manager and signed by all members of the Board of Directors of the Institute of Entrepreneurship Development. Before the final ratification of the text by the President of iED, this policy is sent and consulted with all iED staff, for improvements, changes, amendments.

In order to effectively implement this policy at iED we have set programs and good practice standards for equality and protection of diversity which are reflected in specific measurable targets/objectives, which are listed in Chapter 3 (Annex). These objectives shall be monitored periodically and reviewed in terms of timetables and their achievement.

At iED, a committee has been set up consisting of a member of the Board of Directors, an Employee Representative and the iED's Governance & Internal Policies Manager, provided that there is proportional representation, i.e., two of the three members are women. This committee will:

- be responsible for the implementation, evaluation of the effectiveness, review and revision of this policy and the preparation of the action plan.

- ensure that the principles and commitments of this Agreement and group-wide agreements on gender equality.
- monitor and propose indicators necessary for the Group's gender equality policy and propose improvement actions & training programmes, if required.

The committee meets periodically every three months and in exceptional circumstances (e.g., complaints) and monitors the success of policy implementation and reviews our progress at least once a year. The committee may establish working groups to develop action plans to help us implement this policy and achieve the specific objectives at iED that enhance equality and diversity and prevent all forms of violence and harassment, including gender-based violence and harassment and sexual harassment. The person responsible for ensuring the implementation of the action plans (Article 4) is iED's Governance & Internal Policies Manager. The person responsible for the management of workplace harassment complaints (Liaison) has been appointed by iED's Board of Directors, is Mrs Angeliki Mantse.

This policy is fully supported by the company's senior management. Violations of the policy may be considered as misconduct and could lead to disciplinary proceedings in accordance with the iED's Internal Working Rules (EWR) _v1.3.

Chapter 4 – Action plans and commitments

Chapter 4.1 - Attitude and behaviors – Communication

Responsibility for compliance with the principle of gender equality in the workplace rests solely with the Board of Directors of the Institute of Entrepreneurship Development. However, the success of this policy is primarily based on changing the attitude and behavior of every person at iED (general management, managers, human resources, employee representatives) regarding the role of men and women both at workplace and in life. From that point of view, regular and constructive dialogue at all levels of iED and in the partnerships within the European projects will encourage change. This dialogue will ensure that the objectives of gender equality are fully integrated into all collective agreements, both at the level of iED and in all the partnerships and companies involved in its activities.

The Institute of Entrepreneurship Development supports innovative measures and policies that contribute to enhancing women's professional experience and their proper integration into the workforce, in particular through learning and apprenticeship programs in all roles, operational and managerial. The HR department analyses any gaps between male and female employees, based on clear and understandable information on wage, training, career development and more. The invisible barriers created through prejudices, stereotypes and the way organisations operate that can stop women and groups of people with different characteristics from progressing in their careers.

The management of iED undertakes to provide information on this Policy for raising awareness on gender equality and combating gender-based violence and harassment to all employees, managers, partners in projects, representatives of institutions and trade

unions. Once adopted, this policy is communicated to all interested third parties and is available on the official website of the organization (ied.eu).

Chapter 4.2 - Ensuring equal opportunities in recruitment

Recruitment is an important tool for encouraging diversity in employment and is a dynamic process that determines the composition of the iED's staff. In 2021, women represented the 71.7 % of the workforce with no significant differences between departments, hierarchy and professional categories. In particular, the percentage in the highest hierarchical positions (executive officers, directors, etc.) reached 66.7%, but in 2021, the percentage of women on the Institute's Board of Directors was zero. The Institute of Entrepreneurship Development is committed to diversify the positions open to women and to promote their better representation at senior management levels of iED. In particular, the presence of women will be encouraged in managerial and operational business activities, as well as in jobs where female representation in the EU employment framework is somehow under-represented and therefore under-appreciated. It is also important to remember the principle of European law that the principle of equality does not prevent the practice or adoption of positive discrimination measures for the underrepresented sex in employment and work.

Furthermore, iED believes that work-based training and learning programs are the best way to promote diversity. As such, the Institute of Entrepreneurship Development is committed to developing partnership programs with targeted educational institutions and organisations to develop competencies and skills in women and other groups of people who are underrepresented at certain levels of iED.

iED and its partner organisations also undertake ensuring that equality in career development is strengthened in the context of the age transition, where young people are assigned tasks and responsibilities. Finally, in order to promote the Group's business activities, intergenerational cooperation and the systematic transfer of knowledge and skills (which are essential to maintain the skills, knowledge and "memory" of the company) will be encouraged through mentoring/coaching programs.

As part of the staffing and recruitment process, iED is committed to the following principles:

- Particular attention should be paid to the titles of job offers (always mentioning that a role is open to both men and women). HR departments will try to ensure that the way in which the HR department does not perpetuate stereotypes of occupations or their supposed characteristics (availability, mobility).
- Clear standards and quotas for external recruitment and selection agencies on diversity, pluralism and gender equality shall be applied, in particular the systematic presentation of a large number of female candidates whose qualifications match the post applied for, wherever possible.
- The Institute of Entrepreneurship Development is committed to verifying the impartiality of recruitment through standardized procedures and to take corrective action when necessary. Therefore, iED reiterates that recruitment criteria should be based on qualifications, skills, level of education and professional experience. Therefore, a person cannot be dismissed or excluded from the recruitment process on the grounds of gender, social or cultural origin, name, city of origin and birth, age, disability, political or

religious views, sexuality, trade union membership or any trade union activity. Given this and with the aim of attracting more women to our company, iED's Governance & Internal Policies team will provide guidance and awareness training to HR staff and hiring managers.

A woman's pregnancy (actual, probable or future) cannot be a factor in discriminating against refusal to recruit. It is iED's standard policy to prohibit the HR department or other interested party from seeking any information about a candidate's pregnancy.

Chapter 4.3 - Equality between women and men in terms of career development

The Institute of Entrepreneurship Development is committed to better support the professional development of women throughout their careers, thus facilitating their access to all levels of corporate responsibility and fulfilling the goal of gender parity. IED administrative department is committed to:

- encouraging voluntary internal mobility to improve employment diversity and facilitate inter-enterprise activities. When reorganizations take place, whether they occur internally or lead to outsourcing of company activities, iED is committed to ensuring non-discriminatory treatment of employees.
- Methodically encouraging women's access to senior management positions, decision-making bodies such as the board of directors and managerial positions in general.
- systematic monitoring and career assessment for women during and after maternity leave (and for both men and women in the case of adoption leave). Before leaving with maternity or paternity leave, the responsible manager/head of department must prepare the employee's departure and temporary replacement. Upon return, the manager shall meet with the employee again to provide a summary of significant events that occurred during the period of absence and to discuss their return to work. Depending on the length of the absence, a job evaluation may be conducted, if necessary. Also, any training provided during maternity or parental leave required for its continuation shall be offered again when the employee returns to work in order to maintain its competence and effectiveness. These principles also apply to cases of parental leave.
- taking the necessary measures to ensure that pregnant or breastfeeding women can temporarily adjust their working conditions and/or working hours when these pose a risk to their health or safety. (e.g., in cases of exposure to hazards, when business travel abroad is required, when working in pandemic conditions such as Covid19, when commuting to and from the office is time-consuming or arduous, etc.)
- ensuring that at the end of maternity, paternity or adoption leave, the employee has the right to keep his/her job or equivalent position under conditions that are no less favorable.
- ensuring that gender equality is taken into account in the working environment and working conditions and in the design of the infrastructure and facilities used by workers (for example, sanitary facilities, breastfeeding rooms, personal protective equipment, etc.). Workplaces must be equally suitable for both men and women at all levels.

In order to achieve this, discussions should be held with the Party prior to the design of the offices in order to identify appropriate equipment and infrastructure for mixed teams, existing or future. The iED Risk Assessment also includes gender equality and harassment & violence issues, in which the specific impact of working conditions on women is adequately assessed.

Chapter 4.4 – Equal access to vocational training

The Institute of Entrepreneurship Development is committed to raising awareness among its managers and heads of departments about the equal development of skills and professional qualifications of employees. At the same time, iED undertakes to pay particular attention to the professional training of women and all under-represented groups in the workforce, and in particular to their access to professional training for senior management positions, in order to stimulate their career development. In addition, the conditions for equal access of executives to seminars, professional workshops, conferences and professional skills certification programs are systematically strengthened. The iED's administrative department is constantly investing in planning personal and professional development policies in a fair and equal way for all its staff without discrimination. Training indicators are included in the indicator monitoring system but also in the annual objectives of this policy (Chapter 3).

Chapter 4.5 - Encouraging networks and mentoring of women

In order to facilitate access to high levels of responsibility and to break the "glass ceiling" of men's career advancement from one point in the hierarchy and above, the Institute for Entrepreneurship Development promotes the development of internal and external networks of women and gradually implements a mentoring system. To this end, it cooperates with specialized organisations and NGOs, and makes use of studies and training material produced in the context of the implementation of the European projects in which it participates.

The three-member monitoring committee of this policy assigns a mentor who is a trusted person, male or female, with rich and varied experience in the Institute of Entrepreneurship Development, in the role of a mentor/mentee. The mentor's duty is to guide, assist and motivate the mentored employee, passing on his/her business experience and acquired skills and effective behaviors that he/she has developed in his/her professional life.

The iED management promotes the Women on Top programme where women who are top managers of the Institute for Entrepreneurship Development are encouraged to share their experiences within the company, as well as with students from schools and universities.

Chapter 4.6 – Employee's representation

The administration department of the Institute of Entrepreneurship Development recognizes that the representative bodies of employees contribute in the long term, through honest democratic dialogue within the company, to the development and strengthening of the company's position. Therefore, iED would like to take the opportunity through this policy to reiterate its promise, which is also a personal commitment of the members of the management, that the exercise of a representative mandate and/or trade union activity within the legal framework will not adversely affect the career of an individual at iED in any sense.

Chapter 4.7 - Equal wage for equivalent performance and skills

Equality and fairness of pay is one of the most important pillars of this policy for the Institute of Entrepreneurship Development. Equal wage for women and men at workplace, in terms of basic salary, performance-related pay (Bonus) and other benefits, is a key factor for equality between women and men in society, which has implications for later retirement but also affects work-life balance. iED transparently applies an objective remuneration system that covers all employees and sends a positive message about the company's values and its methods applied for resource's management. A fair and non-discriminatory system that reflects good management practice and contributes effectively to the achievement of business objectives by encouraging productivity in all employees regardless of gender or other discrimination. In this context, iED's HR department systematically communicates the salary scales and the rules for the development and adjustment of salaries and allowances, as well as the criteria for the distribution of the Productivity Bonus based on objective evaluation criteria, so that all stakeholders are aware of it. In addition, any directly or indirectly discriminatory pay practices shall be investigated and, if found to exist, abolished. For this to happen, the representative bodies and workers' representatives must be informed of the pay grades and scales within the Institute. On the basis of the information available, the iED management is committed to achieving the following:

- Equal wage for equivalent jobs and years of experience, between the two sexes
- Equal pay between women and men in senior and managerial positions
- Provision of a monthly allowance to female workers for each child
- Documented equivalent salary progression for both sexes

Chapter 4.8 - Progressive management of any discrepancies & special cases

The Institute of Entrepreneurship Development is committed to achieving and maintaining equal wage between women and men in the long term. The iED's administrative department and operational departments make every effort to even out any discrepancies, for equivalent skills and the same job and level of responsibility. This commitment is part of the action plan provided for in Article 4.7.

All recruitment must comply with the principle of full equality of payment between men and women for equivalent skills and at job level or between jobs with the same responsibilities. If an individual case of discrimination occurs in violation of the applicable regulations, the discrepancy must be remedied within a maximum period of 3 months, with retroactive effect.

Maternity leave is normally a neutral period for individual wage increases and performance-related pay increases. The Institute of Entrepreneurship Development is committed to ensuring that maternity leave does not have a negative impact on the salary level or career development of the women concerned. To this end, the Human Resources Department will verify that maternity period will not have a negative impact on individual wage increases or the determination of wage related to job performance. Similarly, iED's HR department will pay particular attention to parental leave periods in relation to changes in the average earnings of the individual employee concerned.

Chapter 4.9 - Management of part-time employees and trainees

At the Institute of Entrepreneurship Development, any employee who wishes to work part-time should not be subject to discrimination, in particular with regard to his/her remuneration in relation to the actual number of hours worked. Particular attention will be paid by the HR department to the remuneration of part-time workers, who will receive the envisaged salary increases proportional and comparable to those of full-time workers. The gender ratio (Male/Female) of part-time employees in iED, is similar to that of full-time employees. It is the iED's established policy that the employee's workload should be commensurate with the working hours set out in the employment contract and that consideration should be given to adjusting the workload on a case-by-case basis. The HR department also carefully evaluates requests for part-time and part-time employees to move to full-time positions and vice versa, taking into account the equality factor and the equal treatment of applicants on the basis of their gender.

The Institute of Entrepreneurship Development encourages internships for students and graduates at many levels of its operation. All interns are employed in accordance with the conditions and requirements of national labor & social security legislation and in accordance with the standards set by the institution/educational institution from which they come from. iED applies the same policy for trainees as for full-time employees with regard to equality, support for diversity at workplace, prevention and treatment of all forms of violence and harassment at workplace. In addition, iED departmental managers have received clear instructions to observe and prevent unfair practices and unprofessional behavior towards interns by other employees and supervisors, due to abuse of rights based on hierarchical position.

Chapter 4.10 – Work-life balance

The Institute of Entrepreneurship Development seeks to create a better relationship between the private and professional lives of its employees, taking into account the complex and diverse nature of family situations in modern society. This objective requires above all a better way of planning work and an innovative policy to improve the quality of life at work. Achieving a work-life balance affects not only women but all employees in an organization. Male employees who wish to play a greater role in their family life may find themselves confronted by their company, whether this resistance comes from management or from their colleagues.

The policies and actions implemented by iED for this purpose will be tailored to employees' needs, taking into account that these needs vary throughout a person's life and that long uninterrupted periods of work and/or irregular working hours do not contribute to a work-life balance. Working conditions should be such that workers can adequately fulfil all their family responsibilities, with regard to their parents or children, their civic duties, etc. In order to achieve a good work-life balance for employees, parental and/or paternity leave (for both men and women) should be equally available to all.

In consultation with our social partners and our partners in European projects, the iED administrative department ensures that there are no management policies and contractual clauses that support the idea that only women bear family responsibilities. It is important to clarify that the iED's position on this social issue is that raising children is the same to men as it is to women. This policy examines the application of these principles, as well as the promotion of initiatives taken to provide support for both motherhood and fatherhood.

Chapters 4.11 Suppliers and subcontractors – Partners

The Institute of Entrepreneurship Development is committed to ensuring as far as possible that its suppliers, subcontractors, prospective partners and external partners comply with the principles of gender equality and respect for diversity. In this context, iED communicates this policy to its partners and accordingly requests certain key compliance documents (such as organization charts and employment data) and applies a standardized procedure for the screening and evaluation of suppliers and subcontractors. In this process, the evaluation criteria for selecting a partner and entering into cooperation include (if the partner is a legal entity) the following:

- The existence of a written work regulation / equality and diversity policy / policy against violence and harassment of employees (GEP)
- Applying a system of social corporate responsibility
- Partner's public image in the labor market
- History of employee's complaints and/or incidents of discrimination, harassment and/or violence in the partner's working environment
- The existence of aggravating court decisions concerning any employment issue

Additional terms and conditions on equality aspects in employment, diversity management and incident prevention are explicitly mentioned in the work contracts and private agreements between the iED and the supplier/subcontractor, where applicable.

In some cases, where the external partner is an individual person, iED applies the same policy as for full-time employees regarding equality, supporting diversity at workplace and preventing and addressing all forms of violence and harassment at workplace.

Chapter 4.12 - Preventing and combating violence and harassment at workplace

The Institute of Entrepreneurship Development has set strict rules regarding the prevention and combating of violence and harassment at work. Any verbal expressions and behaviors of sexual nature that undermine the dignity of employees due to their degrading or humiliating nature, as well as intimidating, hostile, offensive, threatening or violent situations that degrade, insult and morally harm employees and partners of iED are strictly prohibited at iED. This principle is a key pillar of the iED's Code of Conduct and is included in iED's Internal Working Rules (EWR) _v1.3.

In this context, the iED's Implementation Committee of this policy:

- conducts an assessment of the risks of violence and harassment at work, which is included in the organization's overall Risk Analysis. The analysis is carried out using specific quantitative indicators and factors and is part of the Occupational Risk Assessment at work and is based on international standards.
- shall take specific measures to prevent, control, mitigate and address such risks and to monitor such incidents or patterns of behavior. These measures include training and information, psychometric tests in prevention and multilevel assessment of candidates, disciplinary measures, methods of surveillance and control at workplace and the use of workplace as a place for working.
- plans and implements annually informative, training and awareness-raising activities for iED's staff and partners
- records and communicates within the Institute information on the rights and obligations of employees and the employer, as well as the persons exercising managerial rights or representing the employer (iED Board), to the extent of their own responsibility, in the event of the manifestation or reporting or reporting of incidents of violence and harassment at work, as well as on the relevant procedure for handling such incidents thereafter.
- has designated a specific reference person ("contact person") to guide and inform employees on how to prevent and deal with violence and harassment at work (see Article 3)
- it has internal procedures in place to protect the employment and support of workers who are victims of domestic violence, to the extent possible, by any appropriate means or reasonable accommodation. In this context, the iED committee cooperates with special partners (psychologists, social workers, etc.) and the competent social services of the Municipality of Larissa.

In order to meet the above commitments and rules, the iED Management has developed a Violence and Harassment at Work Response Plan and a Complaints Reception and Review Procedure. To this end, the committee implementing this policy (Article 3) works with experts in the specific issues, who are trained in harassment issues, and with the relevant departments. A key pillar of the iED's policy is the prevention of sexual harassment, where the emphasis will be not only on the immediate implementation of appropriate procedures to resolve incidents of harassment in the workplace, but also on preventing it from happening again.

The three-member committee and the contact person, as mentioned in Article 3, are exclusively responsible for the prevention and response procedures, but also for the management of incidents of violence and harassment at work, in cooperation and support of the iED's legal advisor. Of course, this does not prevent the intervention of other interested parties within the company who may, if they wish, approach the employees involved in the incident, such as the Human Resources department or trade union representatives. The 'liaison' is the first recipient who is informed and evaluates each complaint or incident that has been observed and reports it to the committee which decides to inform the CEO and the legal advisor. Subsequently and within 24 hours, actions are taken to investigate, verify and record the incident, followed by actions including: disciplinary measures, legal actions and involvement of competent services, direct support for victims of violence, work organization measures, etc. The management department promotes transparency and encourages all initiatives to raise awareness among staff on the issue of violence and harassment at workplace. The main pillars of the response to incidents of harassment and violence at the iED are as follows:

- a) Reliable and available communication channels within the company and with external parties. Duties and responsibilities and persons responsible for managing incidents are clearly defined and effectively communicated to all employees. The documentation of responsibilities and communication channels is documented in this document, in the iED's organizational chart and Job Descriptions and in the Internal Work Rules (EWR) _v1.3
- b) Investigating and examining complaints impartially and protect the confidentiality and personal data of victims and complainants. The personal data of the cases are processed only by the competent persons on the basis of the iED's Privacy Policy approved by the administration. (iED, GDPR Terms & Conditions |version 4).
- c) Prohibition of retaliation against the affected person. With the approval of the management, measures are taken to protect the complainant either through measures to organize the work (dismissal, change of department, etc.) or through confidentiality measures (anonymization, etc.) or other legal and judicial remedies.
- d) Systematic recording and evaluation of the consequences of identified violations at individual and company level. Each incident is evaluated in terms of its extent, the consequences for the person affected and the function and image of the iED.
- e) Strict disciplinary measures and sanctions for established offenders without tolerance, depending on the nature and characteristics of the incident, as provided for in the Internal Work Rules (EWC)_v1.3.

f) Cooperation and provision of any relevant information regarding the incident to the competent authorities, social services and the Police, if requested, with the supervision and mediation of the iED's Legal Advisor.

Annex/Indicators

Measured Statistical indicators of Policy/GEP implementation, targets and improvement rates

Annual Index	Numerical Price		(%)		TARGET# annual change
Year 2021	Men	Women	Men	Women	
Board of Directors	3	0	100	0	+33% W
Total Staff number	13	35	27,1%	72,9%	+20% T
Management positions (directors / Supervisors)	2	6	25,0%	75,0%	-
Age Mean	30	30			-
Interns	2	1	66,7%	33,3%	+15% W
Contract for an indefinite period	8	31	20,5%	79,5%	-10% M
Fixed-term contract	0	1	0,0%	100,0%	-
Project Contract / Invoice for services rendered	3	3	50,0%	50,0%	-
Part-time Contracts	0	2	0,0%	100,0%	-
Job offers / Incoming CVs for evaluation	100	125	44,4%	55,6%	+20% T
Departures / Redundancies	5	13	27,8%	72,2%	-
Recruitments	10	21	32,3%	67,7%	+ 20%T
Promotions/upgrades with salary impact	1	4	20,0%	80,0%	+30%T
Job with travelling abroad	3	16	15,8%	84,2%	+15%M
Trainings. Number of hours dedicated to trainings	56	56	50,0%	50,0%	+30%T
Certified Vocational Educational Trainings (number of projects)	1	2	33,3%	66,7%	+25%T
Educational leaves (days)	0	3	0,0%	100,0%	+20%M
Sick leaves (days)	0	13	0,0%	100,0%	-
Parental leaves (number of men and women who use them)	0	0	0,0%	0,0%	-
Maternity - Paternity leaves (days)	0	560	0,0%	100,0%	-
Beneficiaries for having children (number of children counted)	2	3	40,0%	60,0%	-
Incidents of violence/sexual harassment at work (victims)	0	0	0,0%	0,0%	0
Benefits: Average gross annual salary by classification by hierarchical level					Chart 1
Productivity Bonus: bonus level with classification by working section					Chart 2
Breakdown of staff by gender, by department and by position in the hierarchy	Working Sections 5. Levels of hierarchy: INT, JM, M, SM, S, D				Chart 3

W: for women only, M: for men only, T: total sum



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