

**POLICY FOR THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT
AT WORK AND FOR THE PROCEDURE FOR RECEIVING AND EXAMINING
COMPLAINTS IN ACCORDANCE WITH MINISTERIAL DECISION No. 95/2026
(Government Gazette B' 1/08.01.2026)**

Enterprise/Branch: DES PRIMARY EDUCATION PRIVATE COMPANY (P.C.)

Details of the Employer / Legal Representative:

SURNAME: KONSTANTARA

NAME: BILIO

FATHER'S NAME: DIMITRIOS

TIN (Tax Identification Number): 044545151

COMPETENT TAX OFFICE (D.O.Y.): PIRAEUS

RESIDENTIAL ADDRESS: 98 A. PAPANASTASIOU

POSTAL CODE: 18533

The undersigned certifying person: BILIO KONSTANTARA

1. The enterprise under the name “DES PRIMARY EDUCATION PRIVATE COMPANY (P.C.)” complies with all measures and obligations concerning the implementation of Articles 58–69, 507–508, 533 and 537 of Presidential Decree 62/2025 (Government Gazette A' 121) for the prevention and addressing of all forms of violence and harassment, including violence and harassment based on gender and sexual harassment.
2. The purpose of this policy is the creation and establishment of a working environment which respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment. The enterprise under the name “DES PRIMARY EDUCATION PRIVATE COMPANY (P.C.)” declares that it recognizes and respects the right of every employee to a working environment free from violence and harassment and that it does not tolerate any such behavior, of any form, from any person.
3. The present policy is adopted in accordance with Article 62 of Presidential Decree 62/2025 (Government Gazette A' 121) and the regulatory legislation issued pursuant thereto, applies to the persons referred to in paragraph 1 of Article 59 of Presidential Decree 62/2025 (Government Gazette A' 121), and its content is specified as follows:

POLICY CONTENT

a) Assessment of the risks of violence and harassment at work:

Bullying and harassment in the workplace constitute repeated unjustified behaviors directed against an employee or a group of employees, which may humiliate, undermine, threaten, or victimize them. Such negative behaviors and manifestations may occur between colleagues, between employees at different hierarchical levels, from an employer toward an employee, or even from a third party (e.g. student/parent) toward an employee.

Workplace harassment is a widespread problem and may take many forms (e.g. moral or sexual) among employees and at all hierarchical levels within the professional

environment, creating risks to their safety and health. Harassment may consist of aggressive behavior, both verbal and physical, as well as less obvious actions, such as devaluing an employee's work or abilities or socially isolating them within the working environment. Bullying is more likely to occur in workplaces where teasing, jokes, and pranks are tolerated — and harassment frequently involve an element of unfair use or abuse of power, from which victims may be unable to protect themselves.

Occupational violence refers to any incident in which an employee is attacked or threatened in the workplace, including any statement or behavior that causes them to believe that they are in danger of physical assault. The term "*occupational violence*" includes all forms of physical attack against employees or any kind of direct physical contact, including that originating from third parties (such as students, parents, external visitors, etc.). Violence may take various forms: verbal, physical, emotional, sexual, as well as online.

The nature of work within a school unit entails daily and uninterrupted interaction with students, parents, and third-party external visitors who attend the school in the context of educational activities or with whom employees interact in the context of excursions, which increases the risk of incidents of violence or harassment against employees.

Any incident involving bullying or harassment of employees in a school unit must be reported immediately to the School Management, which is responsible for handling the matter by taking appropriate measures.

b) Measures for the prevention, control, limitation and addressing of these risks, as well as for the monitoring of such incidents or forms of behavior:

The enterprise adopts the following measures in order to limit the above risk factors and address the relevant risks: encouragement of the maintenance of a working climate where respect for human dignity, cooperation, and mutual assistance constitute fundamental values; open communication with the employer and immediate supervisors and colleagues; establishment of a report/complaint management procedure; appropriate design of the workplace and allocation of duties; control of access to the school premises; informing staff about the prevention and combating policy implemented by the enterprise; regular evaluation of the effectiveness of the measures.

c) Actions for the information and awareness-raising of staff:

Organization of training seminars with mental health specialists for the recognition of all forms of violence (verbal, physical, psychological, sexual); written notification of all employees regarding the Policy for the Prevention and Combating of Violence and Harassment; creation of a dedicated section on the school's website concerning the complaints procedure; conducting surveys to assess the working climate and identify potential risks; encouragement of the participation of employees and management executives in training programs and educational seminars concerning the recognition and management of risks of violence and harassment at work.

d) Information regarding the rights and obligations of employees and the employer, as well as of persons exercising managerial authority or representing the employer, to the extent and degree of their respective responsibility, in the event of the occurrence, report, or complaint of such incidents, as well as regarding the relevant procedure.

In case that a person is affected by an incident of violence and harassment during access to employment, during the employment relationship, or even if the contract or employment relationship within the framework of which the alleged incident or conduct occurred has ended, they shall have: a) the right to judicial protection, b) the right to file a complaint (named or anonymous) and to submit a request for the resolution of a labor dispute before the Labour Inspectorate (single citizen service line 1555, or via email to the competent Department of the Labour Inspectorate), c) the right to report the matter to the Greek Ombudsman (electronically at the link: <https://www.synigoros.gr/el/anafora/ipovoli-anaforas>, contact telephone number: 213 1306 600), as well as d) the right to file a complaint within the enterprise in accordance with the complaints management policy described below. In the event that the affected person is a woman, she may additionally contact the immediate psychological support and counseling service for women victims of gender-based violence (SOS Helpline 15900).

In any case, when a report or complaint of such an incident arises within the enterprise, the affected person retains all their rights to also seek recourse before any competent authority in parallel.

e) Designation of a contact person (“liaison”) for the guidance and information of employees regarding the prevention and addressing of violence and harassment at work:

As the contact person to whom the affected person may address themselves, Evangelia Karvouna is designated (contact telephone number: 2109656691, email: dimitiko@deschool.eu). The role of the above person is informational in nature: it consists in guiding and informing employees, regardless of whether they approach them in connection with an incident or complaint of violence and harassment or not. In all cases, it constitutes an obligation of the above person to ensure to protect Personal Data (PD) that come to their knowledge in the exercise of their role.

f) Protection of employment and support of employees who are victims of domestic violence, to the extent possible, by any appropriate means or reasonable accommodation.

The enterprise demonstrates in practice its social responsibility toward the phenomenon of domestic violence by providing protection of employment and flexible working arrangements following a request by the employee who is a victim of domestic violence, with the aim of supporting them in maintaining their employment and ensuring their smooth reintegration after such incidents, particularly in cases where there are minor children or children with disabilities or serious illnesses.

PROCEDURE FOR THE RECEIPT AND EXAMINATION OF COMPLAINTS

g) Communication channels and competent persons:

The persons designated as competent for the receipt, examination, and management of complaints and grievances submitted by affected persons concerning behaviors of violence or harassment are:

- The School Principal Evangelia Karvouna (tel. 210 9656691, dimotiko@deschool.eu).

The submission of a grievance or complaint is preferably made in writing and by personal delivery of the document to one of the above persons, following prior arrangement, to ensure the security and confidentiality of the information. In all cases, the above persons inform the affected person of their additional rights, such as the possibility of submitting a complaint to the competent judicial and administrative authorities.

h) Investigation and examination of complaints with impartiality and protection of the confidentiality and personal data of victims and the persons complained against.

Both the employer and the competent persons designated above (under section g) undertake to receive and not obstruct the receipt of, to promptly investigate and manage every such complaint, to examine and assess the reported allegations with impartiality and respect for human dignity, and to immediately take measures for the protection of the affected person.

In all cases, the above people are bound to maintain confidentiality and to ensure the protection of Personal Data (PD), which are collected in the exercise of the above duties.

The persons competent for the examination of the complaint may, if deemed appropriate, inform the employer and the person responsible for human resources management, and may also proceed with any necessary collaborations and the adoption of immediate measures that will assist in the investigation and handling of the incident. Furthermore, these people may have access to company records, to any audiovisual material collected by the enterprise, and to other appropriate means for the collection of information and evidence during the examination of the complaint and for the verification of the reported allegations. Finally, the above competent persons undertake that, in the event they ascertain the existence of a conflict of interest, they are obliged to transfer the complaint/grievance to the other competent person, and they further undertake not to engage themselves in the examination of the reported allegations and to safeguard the confidentiality of the information.

i) Prohibition of retaliation against the affected person.

The termination or in any manner dissolution of the legal relationship upon which employment is based, as well as any other adverse treatment of persons employed in the enterprise, is prohibited and null and void, insofar as it constitutes retaliatory behavior or a countermeasure within the meaning of Article 14 of Law 3896/2010 (Government Gazette A' 207) in relation to an incident of violence and harassment under Article 4 of Law 4808/2021, as amended and in force.

j) Description of the consequences upon establishment of violations.

When an employee or any other person engaged under any employment relationship with the enterprise violates the prohibition of violence and harassment at work, the employer is obliged to take the necessary appropriate and proportionate measures, as the case may require, against the person complained against, in order to prevent and avoid the recurrence of a similar incident or behavior. Such measures may include a recommendation for compliance, change of position, working hours, place, or manner of

providing work, or termination of the employment or cooperation, without prejudice to the prohibition of abuse of rights under Article 281 of the Civil Code.

k) Cooperation and provision of any relevant information to the competent authorities, if requested.

The employer, as well as the above competent persons responsible for the receipt and management of complaints at enterprise level, shall cooperate with any competent public, administrative, or judicial authority which, either ex officio or following a request submitted by an affected person, within the scope of its competence, requests the provision of data or information, and they undertake to provide assistance and access to such data, as required pursuant to Article 5 paragraph 1 of Law 4808/2021. For this purpose, any data collected, in any form, shall be maintained in a relevant file in compliance with the provisions of Law 4624/2019.