

POLICY FOR THE PREVENTION AND ADDRESSING OF VIOLENCE AND HARASSMENT AT WORK

WELDING GREEK INSTITUTE (WGI) ΕΛΛΗΝΙΚΟ ΙΝΣΤΙΤΟΥΤΟ
ΣΥΓΚΟΛΛΗΣΕΩΝ

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PART A PREVENTION AND COMBATING POLICY

1. Introduction and zero-tolerance statement

At the Welding Greece Institute (WGI), **no form** of direct or indirect discrimination, victimisation, intimidation, violence or sexual harassment is tolerated, and the principle of equal treatment is guaranteed.

This policy aims to develop a working and training environment that respects, promotes and safeguards the right of every person to a world of work free from violence and harassment, irrespective of the contractual status of those employed, including persons engaged under a contract for services, independent services or a fee-based mandate, trainees and apprentices.

Every person employed by, trained by or working with WGI can be confident that their concern will be handled with **discretion, confidentiality and responsibility**.

2. Legal framework

- Law 4808/2021 (Part II), ratifying ILO Convention 190 on the elimination of violence and harassment in the world of work.
- Law 3896/2010 on equal treatment of men and women in employment.
- Law 4443/2016 on equal treatment irrespective of race, colour, ethnic origin, religion, disability, age or sexual orientation.
- Article 281 of the Greek Civil Code prohibiting abuse of rights.
- Regulation (EU) 2016/679 (GDPR) and Law 4624/2019.

3. Scope

This policy applies to:

- all WGI personnel, under any form of employment or collaboration;
- instructors, lecturers, examiners and assessors;
- trainees, candidates, interns and apprentices;
- persons exercising the right to work or who have submitted a job application;
- employees of contractors, subcontractors and suppliers, and visitors to the premises.

Violence and harassment may occur **in the workplace**, including public and private spaces and places where the employee works, is paid, or takes a break for rest or meals, in sanitary and washing facilities, changing rooms or accommodation, during **travel to and from work**, on other journeys, on trips and during training, as well as at **work-related events and social activities** and in **work-related communications**, including those carried out through information and communication technologies.

Classrooms, welding workshops, examination areas and on-site training at client premises are expressly included.

4. Definitions

All forms of violence and harassment occurring during work, whether connected with it or arising from it, are prohibited, including gender-based violence and harassment and sexual harassment.

- **Violence and harassment:** behaviours, acts, practices or threats thereof that aim at, result in, or may result in physical, psychological, sexual or economic harm, whether occurring on a single occasion or repeatedly.
- **Harassment:** behaviours that have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive environment, irrespective of whether they constitute a form of discrimination, including harassment on grounds of gender or other grounds of discrimination.
- **Gender-based harassment:** behaviours connected with a person's gender or sexual orientation that have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. **Sexual harassment** is included.

Indicative examples: physical violence and threats; verbal aggression, insults, ridicule and humiliating remarks; systematic isolation or exclusion of a person; unwanted physical contact or sexual innuendo; sending unwanted material of a sexual nature; intimidation and harassment through electronic messages or social media; threats of adverse employment consequences in exchange for favours.

5. Obligations of WGI

It is the primary duty and obligation of WGI:

- (a) to **receive, investigate and manage** every complaint or report, demonstrating zero tolerance of violence and harassment, in confidence and in a manner that respects human dignity, and not to obstruct their receipt, investigation and management;
- (b) to provide **assistance and access to any competent public, administrative or judicial authority** during the investigation of such an incident or conduct, where requested to do so;
- (c) to provide employees with information on the possible risks of violence and harassment and on the relevant prevention and protection measures, including the obligations and rights of employees and of the employer;

- (d) to **inform** employees of the procedures in place for reporting and addressing such conduct, as well as of the contact details of the competent administrative and judicial authorities.

6. Risk assessment and preventive measures

- Inclusion of violence and harassment risks in the written occupational risk assessment, with particular attention to lone working, night or remote work, on-site training and mixed groups of trainees.
- Clear allocation of responsibilities and supervision in the workshops and during examinations.
- Adequate lighting and security in common areas, changing rooms and sanitary facilities.
- Display of this policy in a prominent place and publication at www.wgi.gr.
- Briefing of every new member of staff and of every new group of trainees at the outset.
- Targeted training of supervisors and instructors in recognising and handling incidents.

PART B INTERNAL COMPLAINTS MANAGEMENT PROCEDURE

7. Right to submit a complaint

WGI, having informed its employees, adopts a policy for the management of internal complaints, which includes:

- (a) safe and easily accessible channels of communication for receiving complaints, together with the designation of the persons responsible for receiving and examining complaints and for informing complainants;
- (b) investigation and examination of complaints with **impartiality** and with protection of the confidentiality and personal data of victims and of those complained against;
- (c) the **prohibition of retaliation** and of further victimisation of the affected person;
- (d) a description of the consequences where breaches are established;
- (e) cooperation with, and provision of all relevant information to, the competent authorities upon request.

8. Referent person and reporting channels

The **referent person**, responsible for guiding and informing employees, is **Vaseiliadis Ioannis**.

A complaint may be submitted through any of the following channels:

- by email to **info@wgi.gr**, accessible solely by the referent person;
- by telephone on **2105562130, ext. 3133**, on working days from **[11:00 to 15:00]**;
- in writing, in a sealed envelope addressed to the referent person;

- orally, at a private meeting, in which case a note is drawn up and signed by the complainant.

Where the complaint concerns the referent person or a member of management, it is submitted directly to the **Chief Executive**, who appoints an alternate handler.

9. Content of the complaint

As far as possible, the complaint should include the complainant's details, a description of the incident, the time and place, the persons involved or present, and any available evidence. Incompleteness **is not a ground for rejection**.

Anonymous reports are examined to the extent that the information provided permits an investigation.

10. Examination procedure

- **Step 1 Receipt:** registration in a confidential file and written acknowledgement to the complainant within **[3] working days**.
- **Step 2 Preliminary assessment:** assessment of seriousness and of any immediate risk, within **[5] working days**, and adoption of interim protective measures where required.
- **Step 3 Investigation:** separate hearings of the complainant and of the person complained against, examination of witnesses and evidence. The person complained against is informed of the acts alleged and has the **right to be heard and to respond**. Both are entitled to be accompanied by a person of their choice.
- **Step 4 Findings:** a reasoned report is drawn up within **[20] working days** of receipt, extendable by **[10]** days in complex cases, with written notice to the parties.
- **Step 5 Decision and measures:** adoption of the measures set out in clause 12 and written notification of the outcome to both parties.

At every stage the presumption of innocence of the person complained against is observed, without this detracting from the protection of the affected person.

11. Interim protective measures

Pending completion of the investigation, WGI may take measures to protect the affected person, such as a change of working hours, position or department, remote working, or temporary separation of the person complained against from shared areas. Such measures are **not punitive** and must not adversely alter the terms of employment of the affected person.

12. Measures against the person complained against

Where an employee or other person engaged by WGI breaches the prohibition of violence and harassment under Article 4 of Law 4808/2021, WGI is obliged to take the necessary, appropriate and proportionate measures in each case against that person, in order to prevent the recurrence of a similar incident or conduct.

Those measures include a **warning to comply**, a **change of position, working hours, place or manner of work**, and **termination of the employment or collaboration relationship**, subject to the prohibition of abuse of rights under Article 281 of the Greek Civil Code.

Where the person complained against is a trainee or candidate, the measures additionally include **termination of participation in the programme, without refund of tuition fees**, and exclusion from future participation. Where that person is an employee of a contractor or supplier, their employer is informed and their removal from the premises is requested.

13. Prohibition of retaliation

Any adverse treatment, dismissal, alteration of terms of employment or other retaliation against a person who has submitted a complaint, given evidence as a witness or assisted in the investigation is prohibited. Any such act constitutes a separate disciplinary offence.

A malicious or knowingly false complaint, if proven, also attracts measures; the fact that a complaint is not proven **does not in itself make it false or malicious**.

14. Right to leave the workplace

Where an incident of violence and harassment occurs against an employee, that employee has the right to **leave the workplace for a reasonable period, without loss of pay or any other adverse consequence**, where in their reasonable belief there is an imminent and serious danger to their life, health or safety. The employee shall inform WGI in writing as soon as possible.

15. Withdrawal of a complaint and amicable resolution

Complaints may be withdrawn at any time. Alternatively, mediation and settlement may take place through discussion, with both parties invited and heard, bringing the matter to a close.

Amicable resolution requires the **free consent of the affected person** and does not apply to incidents of physical or sexual violence, which are investigated in every case.

16. Confidentiality and personal data

Every person involved in handling a case is bound by strict confidentiality. Access to the file is limited to those persons for whom it is strictly necessary.

Data are processed in accordance with the GDPR and with Policy WGI/056.3. Case files are retained for **[5] years** from final closure, unless legal proceedings are pending, and are then securely destroyed.

17. Recourse to the competent authorities

This internal procedure **does not replace or restrict** the right of any affected person to apply to any competent administrative or judicial authority, at any stage and irrespective of the outcome of the internal examination.

- **Labour Inspectorate** complaints line **1555**, www.hli.gov.gr
- **Greek Ombudsman** 17 Chalkokondyli St, 104 32 Athens, tel. +30 213 1306600, www.synigoros.gr
- **Hellenic Police** emergency **100** (in cases of immediate danger or of a criminal offence)
- **SOS Line 15900** support for women victims of violence, 24 hours a day
- The competent Public Prosecutor's Office and the civil courts for civil claims

18. Validity and review

This policy takes effect on the date of issue, is communicated to all personnel and is reviewed at least every three years, or whenever the legal framework changes. It is displayed in a prominent place on the premises and published at www.wgi.gr.