

# Anti-Violence and Harassment Policy in the Workplace

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## Abbreviations

- **1. Scope**

This policy defines AthTech S.A.'s zero-tolerance policy toward harassment of any kind in the workplace. It applies to all company employees, managers, contractors, and external partners.

- **2. Rules of Application**

All employees and associates must comply with this policy. Non-compliance is subject to investigation, disciplinary action, and potential termination. The policy is enforced at all company levels.

- **3. Stakeholders – Responsibilities**

All employees are responsible for maintaining a harassment-free workplace. Management must lead by example, ensure prompt investigation of any complaints, and take appropriate corrective actions. The Management Department oversees policy implementation.

- **4. Anti-Harassment Policy**

- **4.1 What is Harassment**

**Violence & Harassment:** Any act or behavior that may cause physical, psychological or sexual harm to the employee.

**Sexual Harassment:** Any unwanted behavior of a sexual nature that violates the dignity of the individual.

AthTech College maintains zero tolerance for harassment. Harassment can be verbal, physical, or psychological, and may come from a colleague, supervisor, or third party such as a client. Examples include but are not limited to:

- Spreading malicious rumors or gossip
- Social exclusion or isolation
- Intimidation or undermining work
- Physical abuse or threats
- Deliberate withholding of information
- Offensive jokes or inappropriate language
- Unreasonable workloads or deadlines
- Persistent criticism or belittlement
- Blocking access to promotions, training, or leave

#### ○ 4.2 Reporting Harassment

Any employee who experiences or witnesses harassment should report it promptly through one of the following channels:

- Directly address the offender, only if certain that the behavior was unintentional and minor.
- Report the incident to their manager, department head, or any executive, especially if others are involved.
- Contact the Management Office at [feedback@athtech.gr](mailto:feedback@athtech.gr) or via Teams with the responsible person. All communication will be handled confidentially.
- Use the anonymous forms shared in the internal channel at Teams for open communication with Upper Management.

Managers or executives who are informed about harassment must notify upper management immediately. Failing to report such incidents will be treated as complicity in the behavior.

#### ● 5 Protection & Support Measures

- Immediate investigation of any complaint
- Protection of the employee from retaliation
- Implementation of disciplinary or legal sanctions where necessary

#### ● 6. Training & Awareness

AthTech College undertakes training and awareness actions for all its members regarding the right to a safe and dignified working environment.

#### ● 7. Version Control Summary

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**Important Note:** This policy has been in effect since 06/09/2021 and is published on the company's internal channels, following the provisions of Greek Law N.4808/2021.

End of Document - Policy