



# Policy for the Prevention and Countering of Violence and Harassment at Work and Complaint Handling Procedures

Document Table			
Date	Edition	Revision	Description of Changes
April 2026	A	1	Initial Edition

*This Policy comes into effect as of the date of the currently applicable edition, as reflected in the Document Table above, and is binding for all persons falling within its scope of application.*

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## PART A: PREVENTION AND COUNTERING OF VIOLENCE AND HARASSMENT AT WORK

### 1. Purpose of the Policy

This Policy for the Prevention and Countering of Violence and Harassment at Work and Complaint Handling Procedures (hereinafter the "**Policy**") is drafted in accordance with Article 62 of Presidential Decree (P.D.) 62/2025 (Government Gazette A' 121) and Ministerial Decision 95/2026 (Government Gazette B' 1/08.01.2026), as well as all relevant national and EU legislation.

The purpose of this Policy is:

- the prevention and effective handling of all forms of violence and harassment occurring during the course of work, linked with it, or arising from it;
- the assurance of a work environment that respects, promotes, and protects human dignity, personality, and the fundamental rights of every individual;
- the establishment of a clear and transparent framework of rights and obligations for the employer, persons exercising managerial rights, and all protected persons;
- the establishment of a safe, accessible, and impartial procedure for the reception, examination, and management of internal complaints;
- the assurance of protection for victims, complainants, and witnesses against retaliation or further victimization.

**ARROW SHIPPING HELLAS SA** (hereinafter the "**Company**") expressly declares its **zero tolerance** for any form of violence and harassment, including gender-based violence and sexual harassment, regardless of the position, status, or contractual relationship of the person involved.

This Policy is part of the company's broader framework of occupational risk prevention measures, including psychosocial risks, and is implemented with a view to equal treatment and respect for human dignity.

### 2. Legal Framework

This Policy is drafted and implemented in accordance with the current national and EU regulatory framework regarding the prevention and countering of violence and harassment at work.



In particular, the following provisions are specifically considered and applied:

- Presidential Decree (P.D.) 62/2025 (A' 121) "Labor Law Code", specifically the provisions regarding the prohibition of violence and harassment at work (Articles 58–69, 507–508, and 533), as well as the protection of human dignity, equal treatment, and the prohibition of discrimination (particularly Articles 16–57);
- Ministerial Decision 95/2026 (Government Gazette B' 1/08.01.2026), regarding the model policy for combating violence and harassment and for managing internal complaints;
- Law 5239/2025, as currently in force;
- Law 4808/2021 (A' 101), which ratified the International Labour Organization (ILO) Convention 190 and established the national framework for the prevention and countering of violence and harassment at work, as currently in force;
- Occupational Health and Safety legislation, particularly Law 3850/2010 (Code of Occupational Health and Safety), as currently in force, as well as the relevant provisions of P.D. 62/2025 regarding the assessment and prevention of occupational and psychosocial risks;
- Current national and EU legislation on personal data protection, particularly Regulation (EU) 2016/679 (GDPR) and Law 4624/2019, as currently in force.

In the event of subsequent amendment or replacement of the above provisions, this Policy shall be interpreted and applied in accordance with the legislative framework in force at any given time.

This Policy does not substitute or limit the rights recognized by current legislation for affected persons, nor the obligations of the employer as derived from applicable law.

### **3. Adoption, Consultation, and Communication of the Policy**

Prior to the final adoption of this Policy, the Company informs the employees' representatives, if any, and provides them with the opportunity to express their views. In the event that there are no employee representatives, the information is provided to the entire staff by any appropriate means.

Following the aforementioned consultation process, the adoption of the Policy is finalized by:



- posting it in a prominent position within the workplace and on the company's notice board;
- posting it on the company's website, if available;
- informing employees and their representatives in writing or by electronic means, through any appropriate channel.

In the event of an amendment to the Policy, the same process of consultation, information, and posting is followed as during its initial adoption.

#### 4. Scope of Application – Protected Persons

This Policy applies to every person employed by or providing work or services on behalf of the Company, regardless of the type of contractual relationship, the form of employment, or its duration.

Specifically, the Policy covers:

- employees under a contract of dependent labor, whether full-time or part-time, fixed-term or indefinite;
- employees through Temporary Agency Work (TAW) or other forms of staff leasing;
- seconded or loaned employees;
- persons providing services under a contract for work or independent services (including freelancers/independent contractors);
- interns, apprentices, and trainees;
- job applicants during the recruitment process;
- former employees, regarding incidents linked to the employment relationship;
- any third party transacting or collaborating with the company (indicatively: customers, suppliers, associates, visitors), to the extent that their behavior is connected to work.

The Policy applies to incidents of violence and harassment taking place:

- at the company's workplaces;
- in areas where work is provided on behalf of the company, including third-party facilities;
- during business travel, trips, training, or corporate events;
- during remote work/teleworking;



- during work-related communications, including electronic and telephone means.

In cases where company employees provide work at third-party facilities, the company cooperates with the host entity to ensure the prevention and handling of incidents of violence and harassment, within the scope of its competence and responsibility.

## 5. Definitions

For the purposes of this Policy, the following terms shall have the meanings attributed below, in accordance with applicable legislation:

### 5.1. Violence and Harassment

"Violence and harassment" refers to forms of behavior, acts, practices, or threats thereof that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, whether manifested as a single incident or repeatedly.

### 5.2. Harassment

"Harassment" refers to forms of behavior that have the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether they constitute a form of discrimination.

Harassment includes harassment based on gender or other grounds of discrimination.

### 5.3. Gender-based Harassment

"Gender-based harassment" refers to forms of behavior related to a person's gender, which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, in accordance with the relevant provisions of P.D. 62/2025.

These forms also include sexual harassment, as well as behaviors related to sexual orientation, gender identity, gender expression, or sex characteristics.

### 5.4. Sexual Harassment

"Sexual harassment" refers to any form of unwanted verbal, non-verbal, or physical behavior of a sexual nature, which has the purpose or effect of violating a person's dignity, particularly by creating an intimidating, hostile, degrading, humiliating, or offensive environment.



## 6. Assessment of Violence and Harassment Risks

The Company recognizes that violence and harassment at work constitute a serious occupational and psychosocial risk, which may affect the physical and mental health of employees, their dignity, and the smooth operation of the Company.

Within the framework of its obligations regarding prevention and the protection of health and safety at work, the Company conducts a Psychosocial Risk Assessment Study, as part of the overall Occupational Risk Assessment.

The Psychosocial Risk Assessment Study:

- considers the nature of the activity, the organizational structure, working conditions, and the specific characteristics of the workplaces;
- evaluates potential factors that may favor the emergence of violence or harassment phenomena;
- examines specific conditions, such as work at third-party facilities, staff leasing, remote work, or increased contact with the public;
- is reviewed on a regular basis or whenever working conditions change significantly.

Within the scope of this assessment, factors that may be linked to an increased probability of violence and harassment incidents are examined, such as:

- unclear distribution of responsibilities or roles;
- excessive workload or prolonged time pressure;
- inadequate communication or dysfunctional hierarchical relationships;
- occupational isolation or work without sufficient supervision;
- increased contact with the public or third parties in high-tension environments;
- working in remote or isolated locations;
- remote work without a clear communication framework;
- organizational practices or behaviors that may favor abusive or offensive conduct.

Based on the findings of the assessment, the Company takes the necessary organizational and administrative prevention and protection measures, as described in the subsequent chapters of this Policy and specified, where required, in the Psychosocial Risk Assessment Study.



## 7. Measures for the Prevention and Countering of Violence and Harassment

The Company takes the necessary organizational and administrative measures to prevent and counter violence and harassment at work, considering the findings of the Psychosocial Risk Assessment Study.

### 7.1. Organizational and Administrative Measures

The Company:

- establishes clear roles, responsibilities, and hierarchical relationships;
- promotes a culture of respect and zero tolerance for incidents of violence and harassment;
- ensures clear procedures for reporting incidents;
- takes measures to prevent conflicts of interest during the handling of complaints;
- cooperates, where required, with third-party entities in cases of staff leasing or work performed at third-party facilities.

### 7.2. Educational and Informational Measures

The Company:

- informs personnel regarding the content of this Policy;
- promotes awareness actions and staff training regarding violence and harassment;
- provides, where required, appropriate training to persons exercising managerial rights or managing complaints.

### 7.3. Protection and Support Measures

In the event of an incident or complaint, the Company may take, on a case-by-case basis, temporary or permanent protection measures, such as:

- change of workplace or work method;
- modification of duties;
- provision of supportive guidance;
- any other appropriate and proportionate measure to prevent the recurrence or escalation of the behavior.

These measures are implemented with respect for the rights of the persons involved and without any adverse treatment.



#### 7.4. Protection of Victims of Domestic Violence

The Company recognizes that domestic violence may significantly affect the working life and safety of employees. Employees who are victims of domestic violence may request, to the extent possible and following notification to the Company, the provision of support or reasonable adjustments, such as:

- flexible working hours;
- temporary change of location or method of work;
- leave in accordance with applicable legislation;
- taking measures to protect the safety of victims of domestic violence within the workplace.

The Company examines such requests with discretion and confidentiality, taking into account both the protection of the affected person and the operational needs of the business.

### 8. Rights and Obligations

#### 8.1. Rights of the Affected Person

Any person falling within the scope of this Policy who considers that they are subject to an incident of violence or harassment—whether during access to employment, during the employment relationship, or even after its termination—retains, in particular, the following rights:

- a) the right to judicial protection;
- b) the right to recourse, filing a complaint, and requesting the resolution of a labor dispute before the Labor Inspectorate;
- c) the right to report the incident to the Greek Ombudsman;
- d) the right to file a complaint within the Company in accordance with this Policy.

The activation of the internal procedure does not limit or exclude the right to seek recourse before any competent administrative or judicial authority.

#### 8.2. Obligations of the Employer and Persons Exercising Managerial Rights

The Company and persons exercising managerial rights or representing the employer are obliged to:

- take every appropriate and suitable measure for prevention and protection;
- examine complaints with objectivity, impartiality, and confidentiality;
- prevent retaliation or adverse treatment against the persons involved;



- comply with the obligations provided for in Articles 65–68 of P.D. 62/2025, as currently in force.

The Company informs personnel and maintains in a prominent position the contact details of the competent administrative authorities, specifically:

- the Labor Inspectorate (Citizen Service Line 1555);
- the Greek Ombudsman ([www.synigoros.gr](http://www.synigoros.gr));
- the SOS Line 15900, for the provision of immediate psychological support and counseling to women victims of gender-based violence.

### 8.3. Consequences of Non-Compliance

Violation of the provisions regarding the prohibition of violence and harassment may entail the consequences provided by law, according to Articles 65–68 of P.D. 62/2025, as well as measures provided for by any applicable Internal Work Regulations or other applicable internal Company procedures, depending on the severity of the violation.

These measures may include, indicatively: recommendations, written reprimand, modification of duties, temporary removal from the workplace, as well as any other appropriate and proportionate administrative or disciplinary measure.

## 9. Designation of Designated Contact Person and Internal Complaints Committee

### 9.1. Designated Contact Person ("Liaison")

The Company encourages any person falling within the scope of this Policy who considers that they have suffered an incident of violence or harassment to submit their complaint and/or grievance.

For this purpose, the following person is appointed as the Designated Contact Person ("Liaison") for violence and harassment issues:

**Full Name: Patounas Georgios**

**Position in the Company: Office Clerk**

**Email Address: [gap@arrowship.com](mailto:gap@arrowship.com)**

**Contact Telephone: 6951 855253**

The Designated Contact Person constitutes the primary point of contact within the Company for violence and harassment issues and is responsible for:

- receiving complaints and grievances;
- providing information and guidance regarding the rights and the procedure to be followed;
- supporting the persons involved in understanding their available options.



Their role is primarily informational and supportive and is exercised regardless of whether the person wishes for the immediate activation of the investigation procedure.

Access to the Designated Contact Person is direct and easy via the above contact details.

In the performance of their duties, the Designated Contact Person is required to maintain strict confidentiality and ensure the protection of Personal Data that comes to their knowledge, in accordance with applicable legislation.

### 9.2. Substitute Designated Contact Person

In the event of absence, impediment, or conflict of interest of the Designated Contact Person, a Substitute is designated as follows:

**Full Name: Meidani Garyfallia**

**Position in the Company: Assistant Accountant**

**Email Address: [lsm@arrowship.com](mailto:lsm@arrowship.com)**

**Contact Telephone: 6974 069790**

The Substitute exercises the duties of the Designated Contact Person during the period of substitution, with the same obligations of impartiality and confidentiality.

### 9.3. Internal Complaints Committee

For the investigation of complaints regarding violence and harassment, the Company establishes an Internal Complaints Committee.

The Committee consists of the following members:

<i>No.</i>	<i>Full Name</i>	<i>Position in the Company</i>	<i>Email Address</i>	<i>Contact Telephone</i>
<b>1</b>	Kavalekas Stergios	Shipbroker	<a href="mailto:sik@arrowship.com">sik@arrowship.com</a>	6951 855254
<b>2</b>	Kostopoulos Konstantinos	Legal Representative	<a href="mailto:cic@arrowship.com">cic@arrowship.com</a>	6951 855251
<b>3</b>	Kostogiannis Anargyros	Legal Representative	<a href="mailto:agc@arrowship.com">agc@arrowship.com</a>	6974 300629



The Committee:

- examines complaints with objectivity and impartiality;
- may summon the persons involved to provide explanations;
- evaluates the available evidence;
- recommends appropriate measures or actions to the Management.

The members of the Committee must act with discretion, maintain the confidentiality of the procedure, and recuse themselves in the event of a conflict of interest.

In the event that a member of the Committee is involved in the complaint or if there is a reason for bias, they shall be replaced by another suitable person.

The initial contact for filing a complaint is made through the Designated Contact Person, unless otherwise provided or in the case of a conflict of interest.

## **PART B: PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS**

### **10. Submission of Complaints**

The Company ensures that every person falling within the scope of this Policy has the opportunity to submit a complaint regarding an incident of violence or harassment in a secure, confidential, and accessible manner.

#### **10.1. Methods of Submitting a Complaint**

A complaint may be submitted:

- in writing, by sending an email to the Designated Contact Person's email address;
- by hand, by delivering a document to the Designated Contact Person;
- verbally, in which case it is recorded in writing by the competent person.

The Company encourages the submission of named (non-anonymous) complaints to ensure the effective investigation of incidents.

#### **10.2. Anonymous Complaints**

Anonymous complaints are taken into consideration and evaluated based on:

- the degree of documentation of the reported incidents;
- the severity of their content;



- the feasibility of investigating the reported acts.

Anonymity may hinder the investigation of the case, but it does not preclude its examination.

### 10.3. Content of the Complaint

To the extent possible, the complaint should include basic information that facilitates the investigation, such as:

- the details of the complainant (if not anonymous);
- the details of the person against whom the complaint is made;
- a brief description of the incident;
- the place and time of occurrence;
- any witnesses or available evidence of any form (documents, emails, videos, text or voice messages).

The lack of certain details does not prevent the examination of the complaint. To facilitate the submission of complaints, the Company provides a **Violence and Harassment Incident Reporting/Complaint Template (Annex I)**, which may be used without being a mandatory requirement for the acceptance of the complaint.

## 11. Complaint Examination Procedure

### 11.1. Timeline for Submitting a Complaint

Reports or complaints are generally submitted within two (2) months from the date of the incident or the most recent occurrence, in order to facilitate their effective investigation and the accurate recall of events by the involved parties and any witnesses.

Complaints submitted after the lapse of the aforementioned period shall be examined normally, particularly when the delay is justified by the nature of the incident, the psychological state of the complainant, fear of retaliation, or other reasonable grounds. Delay does not constitute a reason for non-acceptance or non-examination of the complaint; however, it may practically hinder its investigation.

### 11.2. Recording and Notification of the Complaint

Within the framework of the internal procedure, the Designated Contact Person shall produce a detailed record within fifteen (15) working days of receiving the complaint, which shall include:

- a description of the incident;



- the place and time of occurrence;
- the persons involved;
- any witnesses and available evidence;
- the complainant's view regarding the sought outcome.

Where required, interviews are conducted with the complainant and other involved persons for a more complete recording of the facts. The record is shared with the complainant to confirm its accuracy.

Within ten (10) working days from the completion of the recording, the content of the complaint is disclosed to the person against whom the complaint is made, who is invited to submit a written response within ten (10) working days of notification. Throughout this process, the right to a hearing and the principle of impartiality are ensured.

### **11.3. Investigation and Findings**

Upon receipt of the response from the person against whom the complaint is made, further investigation is conducted, which may include additional interviews with the involved parties, examination of witnesses, and evaluation of available evidence.

Subsequently, an investigation report is drafted for the Internal Complaints Committee, reflecting the facts, the evaluation of the evidence, the conclusions, and any proposed measures, in accordance with Chapter 8.3.

The Committee may proceed with additional actions or hearings before the final validation of the report. The final text is validated by the Committee and communicated to the involved parties, to the extent permitted by personal data protection legislation.

The entire process shall not exceed sixty (60) days from the submission of the complaint, unless exceptional reasons exist that justify a reasonable extension.

### **11.4. Special Cases - Record Keeping - Completion of Procedure**

In the event that the person against whom the complaint is made is not an employee of the Company, the Company shall take every appropriate measure within the limits of its competence and, where feasible, cooperate with the competent body or the business to which that person belongs.

The Designated Contact Person maintains a record of all actions carried out within the framework of the procedure, ensuring confidentiality and the protection of Personal Data.



If, at any stage of the procedure, it is determined with justification that its continuation is not warranted, the involved parties are informed in writing of the completion of the procedure and the relevant reasons.

## 12. Prohibition of Retaliation

In accordance with Article 62 of P.D. 62/2025 (A' 121) and the provisions of labor legislation, the Company expressly prohibits any form of retaliation, adverse treatment, or intimidation against any person who:

- submits a complaint or reports an incident of violence or harassment;
- provides information or testimony within the framework of an investigation;
- supports or assists an affected person;
- seeks recourse before competent administrative or judicial authorities.

Retaliation specifically refers to acts or omissions that negatively affect the terms and conditions of employment, such as, indicatively:

- unjustified change of duties;
- adverse performance evaluation;
- exclusion from benefits or opportunities;
- threats or intimidation;
- termination of the employment contract.

The submission of a complaint shall not entail any adverse consequence for the complainant, even if the complaint is not confirmed, provided it is not proven that it was submitted maliciously or with the knowledge of false facts.

## 13. Confidentiality and Protection of Personal Data

The Company ensures that all reports, complaints, and relevant procedures are conducted with absolute confidentiality and with respect for the protection of Personal Data.

The details of the persons involved, as well as any information arising within the framework of the investigation, are disclosed only to those persons strictly necessary for the purposes of examining the case.

Data processing is carried out in accordance with:

- the General Data Protection Regulation (EU) 2016/679 (GDPR);



- Law 4624/2019, as currently in force;
- and the Company's internal data protection policies.

The relevant records are kept in a secure manner and for the period of time necessary for the purposes of investigation and compliance with the Company's legal obligations.

## **14. Implementation of the Policy**

### **14.1. Entry into Force**

This Policy enters into force on the date specified in the Document Table and is binding for all persons falling within its scope of application.

### **14.2. Revision**

This Policy is reviewed on a regular basis, and particularly in the event of changes in legislation or organizational changes affecting its implementation.

### **14.3. Relationship with Other Regulations**

This Policy applies complementarily to applicable legislation and to any existing Internal Work Regulations or other internal Company policies. In the event of a conflict, the applicable legislation shall prevail.

### **14.4. Cooperation with Competent Authorities**

The Company cooperates with the competent administrative and judicial authorities and provides any necessary information or data requested within the framework of their legal powers, while complying with the provisions on the protection of Personal Data.

## **15. Approval of the Policy**

This Policy is approved by the Company's Management and enters into force on the date specified in the Document Table.

On behalf of the Company

Full Name: \_\_ Kostopoulos Konstantinos\_\_

Ιδιότητα: \_\_\_\_\_ Legal Representative \_\_\_\_\_

Date: \_\_27/04/2026\_\_\_\_\_

Signature: \_\_\_\_\_



## ANNEX I: VIOLENCE AND HARASSMENT INCIDENT REPORTING / COMPLAINT TEMPLATE

(This template is to be used for the submission of a grievance or complaint in accordance with the Company's Policy.)

### 1. Complainant's Details (unless submitted anonymously)

Full Name: \_\_\_\_\_  
Position / Department: \_\_\_\_\_  
Contact Telephone: \_\_\_\_\_  
Email Address: \_\_\_\_\_

I wish for my details to remain confidential to the extent permitted by law.

### 2. Details of the Person against whom the complaint is made

Full Name: \_\_\_\_\_  
Position / Department: \_\_\_\_\_  
Department (if an employee): \_\_\_\_\_

### 3. Description of the Incident

Date(s) of incident: \_\_\_\_\_  
Location: \_\_\_\_\_

Detailed description of events (what happened, how, and which behavior is considered violence or harassment):

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### 4. Witnesses (if any)

Full Name: \_\_\_\_\_  
Contact Details: \_\_\_\_\_



**5. Supporting Evidence**

- Documents
- Electronic messages (email)
- Messages (text / voice)
- Video / photos
- Other: \_\_\_\_\_

Description / Attachment of evidence:

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**6. Desired Outcome / Request**

Please examine this complaint and take the appropriate measures.

Specifically, I request:

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**7. Declaration**

I declare that the above information is true and submitted within the framework of the Policy for the Prevention and Countering of Violence and Harassment at Work.

Date: \_\_\_\_\_

Signature (if submitted in writing): \_\_\_\_\_

**Notice on the Processing of Personal Data**

The personal data included in this report will be processed exclusively for the purposes of investigating the complaint, in accordance with the General Data Protection Regulation (EU) 2016/679 and applicable national legislation.

Access to the data is restricted to strictly competent persons only.

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Signature:  
ΚΩΝΣΤΑΝΤΙΝΟΣ ΚΩΣΤΟΠΟΥΛΟΣ /  
KONSTANTINOS KOSTOPOULOS  
Father's name: ΙΩΑΝΝΗΣ / IOANNIS  
TIN: 069232581  
Date of signature: 18/05/2026 18:15:41