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## 1.0 PURPOSE

The purpose of this policy (POL) is to establish and promote a workplace which respects, promotes and safeguards human dignity. Acts of violence, threatening and malicious behavior, or intimidation as well as any retaliation act will not be tolerated. To such end, BD is committed to take all necessary measures required in order to create and maintain a healthy work environment, in compliance with the applicable law provisions.

## 2.0 SCOPE

This POL applies to all individuals included in Part I. paragraph 1 article 2 & Part II paragraph 1 article 3 of Greek Law 4808/2021, including full-time and part-time employees, persons working irrespective of their contractual status (agents, contractors), persons in training, including interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants, and individuals exercising the authority, duties or responsibilities of an employer. Moreover, it is applicable in case of behaviors of violence and harassment expressed towards or on behalf of third parties, either at work or on the occasion of work

## 3.0 DEFINITIONS

Refer to the *Quality Systems Glossary of Terms* (GPOL-003) for a full list of definitions.


**Violence and harassment:** A range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.

**Harassment:** Behaviors that aim at or result in the harm of a person's dignity and the creation of a bullying, hostile, humiliating, degrading or aggressive environment and include gender-based harassment or other discriminatory reasons.

**Gender harassment:** Violence and harassment directed at persons because of their sex or gender that aim at or result in the harm of a person's dignity and the creation of a bullying, hostile, humiliating, degrading or aggressive environment. Such behaviors also include sexual harassment, as well as the behaviors that aim at a person's sexual orientation, expression, identity or gender characteristics according to article 2 of law 3896/2010 (A' 107) and par. 2 of article 2 of law 4443/2016 (A' 232). These forms of behavior include the sexual harassment of Law 3896/2010, as well as forms of behavior linked to the person's sexual orientation, expression, identity or gender characteristics.

**Sexual Harassment:** Any unwelcome sexual approach or expression of sexual interest of any form (verbal, psychological or physical), that aim at or result in the harm of a person's dignity and the creation of a bullying, hostile, humiliating, degrading or aggressive environment. Such behavior may be performed not only by a Manager to a subordinate employee, but also vice versa or even by a colleague of the same tier, as well as between colleagues of different or the same sex, of the different or same age, etc.

While it is not possible to list all circumstances that may constitute sexual harassment, the following are some examples of conduct which, if unwelcome, may constitute sexual harassment:

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- Unwelcome sexual advances – whether they involve physical touching or not
- Sexual nicknames, jokes, written or oral references to sexual conduct
- Comments on an individual's body or an individual's sexual activity
- Displaying or distributing sexually suggestive objects or pictures
- Unwelcome leering, whistling, touching, sexual gestures, suggestive or insulting comments
- Discussion of one's sexual activities

Incidents. The forms of conduct prohibited by this policy include, but are not limited to:

Insults based on discrimination based on gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices, threats, verbal or by gestures, insults in public or in private, belittling or ridiculing a person or their abilities, whether in private or in front of others, threatened or actual physical violence, persistent or unjustified criticism.

Abusive, malicious, derogatory, obscene or derisive comments and their dissemination, innuendos, sexist or racist "jokes" and comments, use of offensive language, verbal sexual harassment or suggestions, insinuations that someone's sexual favors can advance his/her career or that refusing to enter into a sexual relationship may negatively affect his/her career path at the Company, offering benefits (e.g. promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sexual contact" as a means of professional development in the workplace, retaliating or threatening retaliation after rejecting sexual advances.

Cyberbullying, sending messages with harassing and offensive content via SMS, email, social media, fax or letter, persistent and/or offensive questions about age, marital status, personal life, sexual orientation, and similar questions about race or ethnicity, including cultural identity and religion. Also included are visual forms of harassment such as e.g. posters, cartoons, photographs or designs that are derogatory based on characteristics protected by law.

Unwanted physical contact such as touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing as well as physical violence of any kind. Invasion of privacy, intentional partial or total destruction of personal belongings, vehicles or property, interference or obstruction of the normal work, movement and physical integrity of the individual, physical exclusion or confinement, sexual gestures, physical surveillance, the pursuit. The above acts are indicative and do not constitute an exclusive list of prohibited acts.

## 4.0 RESPONSIBILITIES

### 4.1 Human Resources


Human Resources shall be responsible for establishing and maintaining this GQP as part of the Core Quality System.

Refer to the *BD Quality Management System Framework* (GPOL-002) for a full list of GPO responsibilities.

## 5.0 REQUIREMENTS

### 5.1 How, By Whom and Where May Harassment Take Place

#### 5.1.1 How?

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Harassment can be either direct or indirect.

Direct harassment: any comment/behavior addressed directly to a person and based on stereotypes and prejudices, in relation to a protected individual characteristic of a person.

Indicative forms of direct harassment:

- orders, threats, gestures, remarks, jokes, taunts about a person's looks, body, clothing, habits or traditions and customs,
- any form of disrespect such as shouting, insults or humiliating comments
- Mocking an employee because of his or her accent or origin or color or sexual orientation or appearance.

Indirect harassment: a behavior may initially appear neutral, but it may imply an unfavorable treatment of an employee based on a protected characteristic.

Example of indirect harassment: creating a climate of bullying in the workplace to homosexual workers, etc.

Such undesirable behaviors, either direct or indirect, can be manifested not only verbally but also visually (i.e. sexual glance) or physically (eg. unwanted conduct).

#### **5.1.2. By whom?**

Behaviors or conducts which are prohibited under this POL can be performed by any person within the workplace e.g. BOD member, employee, associate (service or project provider), apprentice, even a former employee of the Company. Any person who displays such behavior may be charged with harassment within the workplace.

#### **5.1.3. Where?**


Harassment of employees occurring in the workplace or in other settings, in which employees may find themselves in connection with their employment, is unlawful and will not be tolerated. In particular the policy applies (a) in the workplace, including public and private spaces which are a place of work; (b) in places where the employee is paid, takes a rest break or a meal; (c) during work-related trips, travelling, training, events or social activities (i.e. after work drinks); (d) through work-related communications, including those enabled by information and communication technologies (emails, text messages etc.); (e) in employer-provided accommodation; and (f) when commuting to and from work.

### **5.2. Measures Of Prevention and Control Of Violence And Harassment In The Workplace**

#### **5.2.1. Risk assessment**

The company has made a written assessment of the work-related risks, which includes the assessment of psychosocial risks, the risks of violence and harassment, sexual harassment, as well as the measures taken to control and reduce same.

The company declares that the following behaviors / incidents of violence and harassment are prohibited (indicatively but not restrictively): the use of offensive language either orally or in writing (emails, letters, phone calls), derogatory comments, jokes, insults, threats, sexual or racist comments or jokes or implicit comments about ones appearance, the creation of a hostile or intimidating working environment, offensive and persistent questions about one's race or nationality, including one's cultural identity and religion, one's age, marital status, personal life, sexual interests or preferences, physical harassment / gestures and conduct, any kind of physical contact, displaying and distributing (via SMS, e-mail, social media, etc.) offensive or sexually explicit material, unwanted sexual suggestions or persistent suggestions for dating or

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threats, implications that sexual favors may be a means of professional development in the workplace, distribution of photographs or designs that are derogatory, the display and distribution of offensive material, exclusion from social events, working group meetings, the dissemination of malicious comments or insults mainly due to discrimination based on age, sex, type of marriage, any disability, sexual preferences, religion retaliation or intimidation in the event of a report by any of the aforementioned forms of harassment or for cooperating in the investigation of a harassment incident.

### **5.2.2. Measures for the prevention, control of incidents of violence and harassment**

Any form of violence and harassment in the workplace is not acceptable. The company's employees are obliged to comply with the relevant rules in place, as they have been further defined in the company's Code of Conduct.

The company takes all necessary measures in order to prevent incidents of violence and harassment in the workplace. In particular, the company shall:


- Ensure a safe, fair and friendly working environment where relationships between employees, managers and its associates are based on by mutual respect, honesty, trust, cooperation and assistance.
- Inform and sensitize its staff, using all appropriate means (i.e. post to company's intranet), in order to prevent violence and harassment, so that everyone is aware of the company's policies and procedures against incidents of violence and harassment as well as to whom they should address in such cases.
- Train its executives to distinguish between discrimination, violence and harassment in the workplace and to provide the necessary support to their staff and associates.
- Take all appropriate measures and make any reasonable adjustments to working conditions to protect employment and support workers - victims of domestic violence.
- Collaborate with the Work Doctor in order to update the Occupational Risk Assessment, to include psychosocial risks, including the risks of violence and harassment, and the prevention of incidents of violence and harassment at the workplace.
- Encourage its employees and any third party associated in any way with the company to report incidents of discrimination, violence and harassment in the workplace, which they happen to witness.
- Evaluates on a regular basis the effectiveness of the implemented preventive measures and measures to deal with violence and harassment in the workplace and update the risk assessment and measures where necessary.

### **5.2.3. Information of Employees**

In compliance with the relevant legal provisions, the company shall inform its employees and any person who falls under the scope of this POL regarding their rights and obligations and update this POL whenever required.

To such end:

- All Managers and/or supervisors are responsible for ensuring that all employees, contractors and volunteers are aware of and comply with this POL.
- Every individual who falls under the scope of this POL shall fully comply with any obligation imposed by the present and respect other people's rights.
- In case an employee becomes a victim of a behavior of violence or harassment as discussed above, he/she is entitled to take the following actions:
  - Talk to their Line Manager, expressing any complaint or concern, for advice or any other kind of assistance.

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- File a complaint internally before the Ethics and Compliance Department, the Human Resources Department, the Legal Department, the International Helpline Portal, as detailed in the company's Code of Conduct each time in force);
- File a lawsuit before the competent courts;
- File a complaint before the competent Labor authorities;
- Contact the Greek Ombudsman;
- Refrain from work for a reasonable period of time, without any adverse consequences or reduction of salary if the employee deems that a serious danger to his/her life, health or safety is imminent. Prior to that, the employee must have informed the company's Human Resources Department in writing, stating the incident of violence or harassment he/she invokes and the facts that prove it, as well as justify the imminent danger. If it is judged by the relevant investigation that there is no such risk and nevertheless the employee refuses to return to work, the company will refer the case to the competent department of the Labor Inspection.
- The company shall post (in a noticeable place) the contact information of the competent administrative authorities to which any complainant may file his/her complaint (labor authorities, Ombudsman). Complaints may also be made by phone, i.e. through the hotline for citizens' service 1555 and at <https://1555.gov.gr/>, Victims can also contact the SOS Line 15900 (General Secretariat of Demographic and Family Policy and Gender Equality [G. G.I.F.]", which is specifically competent for providing psychological support and consulting women who are victims of gender-based violence.
- Provision of special leave or flexible work arrangements at the request of a victim of domestic violence, in order to support the latter in maintaining his/her job and in his/her smooth reintegration after such incidents, especially in cases where there are minor children or children with disabilities or serious illnesses.

### **5.3 Rights and Obligations Of The Company And The Employees, In Case Of A Complaint For Harassment.**


#### **5.3.1. Company's Obligations:**

Managers are assigned to prevent any incident related to violence and harassment. More specifically, Managers shall:

- ensure the implementation of this POL in their area of responsibility
- lead by example
- act immediately when they become aware of any prohibited behavior
- encourage employees to report incidents of violence and harassment
- ensure that any action of retaliation will be avoided
- cooperate with the competent authorities by providing any relevant information related to the case under examination.
- immediately inform the Contact Person, as defined below, regarding any incident of violence and harassment that have occurred in their area of responsibility.
- train its executives in every appropriate way and means to recognize discrimination, violence and harassment at work and to provide the required support to its staff and partners
- encourages the participation of employees and management in training and education programs related to the recognition and management of potential risks of violence and harassment, as it may also hold seminars with mental health specialists or counseling service providers

#### **5.3.2. Employee obligations:**

Each employee shall:

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- Officially report and file a complaint regarding employment discrimination or harassment, without fear of retaliation, as detailed in the respective company's Code of Conduct. In practice, if an employee of the company cannot evaluate whether another employee's behavior is acceptable or not, he/she is encouraged to contact with his/her Line Manager and further with the Company's Human Resources Department to discuss such concerns.
- Avoid by all means any expression of violence or harassment against other individuals.
- "Treat others like he/she would like to be treated".
- Avoid using stereotypes or any other type of discrimination against any individuals.
- Ask the individual who performs any behavior of violence/harassment to stop and explicitly take a stand against it. Moreover, it is strictly forbidden to encourage him/her or to assist the latter in any way.
- Do not remain uninvolved if he/she sees that a colleague becomes a victim of harassment or intimidation but report the incident to the competent persons within the company.

#### **5.4. Procedure For Internal Complaints Regarding Incidents Of Violence And Harassment:**

The company demonstrates zero tolerance in case of incidents of violence and harassment in the workplace. To such end, a specific procedure is followed in terms of internal addressing of such complaints. The key elements of such procedure are the following:

- the development of secure and easily accessible communication channels for receiving complaints, as well as the determination of those who are authorized to receive and review the relevant complaints and inform the complainants,
- investigating complaints impartially and protecting the victims/complainants' confidentiality and personal data,
- the prohibition of retaliation and further victimization of the complainant,
- description of the consequences,
- cooperation with the competent authorities and provision of any relevant information to them, when requested.

##### **5.4.1. Determination of a "Contact person"**

Designated as the "Contact Person", responsible for informing and guiding employees on issues of violence and harassment at work is Valentina Maria Maurelli Sr. HR Manager Italy& Greece with whom you may contact at the following email address for any relevant information [valentina.maria.maurelli@bd.com](mailto:valentina.maria.maurelli@bd.com).


The "Contact Person" should further inform the complainant regarding all available options that he/she may follow at any stage of the internal investigation company procedure, i.e., file a complaint to the competent administrative authorities (Labor Inspectorate and Ombudsman), file a lawsuit before the competent courts.

The "Contact Person" shall always respect the applicable rules GDPR and confidentiality (or any other applicable law and regulation on the processing of personal data), in relation to the collection of personal data in terms of investigating a harassment case.

##### **5.4.2. Individuals with whom a complainant may contact in order to report incidents of violence and harassment**

Employees may report incidents of violence and harassment at the workplace to any of the following individuals:

- Each employee may contact his/her Manager. The latter is responsible to receive, investigate and address any relevant complaint or report related to violence and harassment.

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- Either to the Company (Ethics and Compliance Office, by sending an email at ethicsoffice@bd.com or by telephone at 855-209-1582 for Greece).

Moreover, the manager should not in any case prevent the receipt, investigation and addressing of such complaints in any possible way.

Managers shall immediately report to Human Resources Department any other violation he/she was informed by any third party or he/she became aware of.

Reports/complaints should be submitted as soon as possible and the relevant information should be provided to the extent necessary.

#### **5.4.3. Investigation procedure**

Each complaint/report regarding violence and harassment should be further examined and investigated expeditiously and with the utmost confidentiality.

The Human Resources Department is responsible for conducting an appropriate investigation in order to determine whether and to what extent the incident claimed has actually occurred and to what extent.

While conducting the investigation, the Human Resources Department will:

- create a file about the incident of violence and harassment reported,
- document carefully the reported incidents of violence and harassment
- collect any evidence necessary for the investigation.

Any documents, electronic information, eyewitness testimonies, etc. may be used as evidence for the investigation.

Throughout the investigation, the Human Resources Department will make any effort possible to safeguard maximum sensitivity and confidentiality, involving only those persons who are strictly necessary. To such end, the identity of the complainant is confidential and will not be disclosed to anyone (unless the complainant requests so).

#### **5.4.4. Procedure following the completion of the investigation - consequences in case of violations**

Upon the completion of the investigation, the Human Resources Department will notify the complainant in writing regarding the completion of the investigation and its outcome.


Furthermore, the company will cooperate with the competent authorities in order to investigate and respond to any complaint regarding violence and harassment, as well as to provide any assistance required on behalf of the Company.

If, upon completion of the investigation regarding the reported incidents of violence and harassment, a violation of this policy is found, the Company will take appropriate corrective and preventive measures, including but not limited to:

- Oral warning.
- Change of position/working hours/place of work/ manner of performing the work.

Stricter action may be taken in the following indicatively mentioned situations:

- Repeated violations of law or policy.

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- Concealment or destruction of information.
- Failure to report a violation.
- False/incorrect reporting of a violation.
- Retaliation against an individual.

The type of discipline measure imposed will depend on the nature and severity of the misconduct, in accordance with the disciplinary procedure set out in the company's Internal Working Regulation.

The company may ask the complainant's Manager to monitor the development of the matter so as to ensure that none of the alleged incidents persist after the imposition of the appropriate disciplinary sanctions. At the same time, the competent Manager should be alert for any potential retaliation.

#### **5.5. Prohibition Of Retaliation**

Any conduct likely to discourage an employee from reporting incidents of violence and harassment against him/her or another co-worker may be considered "retaliation."

Retaliation against an employee for filing a complaint regarding violation of a company policy or for participating in an investigation constitutes unlawful conduct and violation of this POL.

It is noted that any adverse treatment or even a termination of the employment agreement of a person who filed a complaint or participated in an investigation, is considered null and void.

Examples of adverse treatment that may be considered as retaliation acts include, but are not limited to:

- dismissal,
- disciplinary warning,
- denial of a salary increase or of a voluntary benefit (bonus),
- exclusion from meetings or other work activities
- confrontation with or criticism of the individual because of the complaint.

Anyone who retaliates is subject to disciplinary sanctions in accordance with the company's Internal Working Regulation.


#### **5.6. Cooperation With The Competent Authorities**

The company through its authorized representatives shall cooperate with any competent authority in relation to any request for provision of data or information for any case brought before said authority. To this end, any information gathered, in whatever form, shall be kept in a file for the period of time, in accordance with the legal provisions on the protection of personal data.

#### **5.7. Final Provisions**

This policy does not grant any contractual rights to individual employees. The Company reserves its right to modify and/or abolish any of its terms at any time. This Policy is posted on the official website of the Company at the following link: <https://www.bd.com>



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**COMPANY:** Becton Dickinson Hellas SA

**LEGAL REPRESENTATIVE:** Country Sales Lead BDI Greece

**LAST NAME:** Tripodianos

**NAME:** Manolis

**FATHER'S LAST NAME:** Isaak

**TAX ID:** 094501826

**TAX AUTHORITY:** FAE Piraeus

**ADDRESS OF RESIDENCE:** Filellinon1 & M. Alexandrou Str

**ZIP CODE:** 16452


**CONTACT PERSON:** Valentina Maria Maurelli, Sr. HR Manager Italy& Greece

**SAFETY TECHNICIAN –WORK DOCTOR:** Ioannis Touris

**CERTIFIED BY:** TUV Nord

**EMPLOYEES:** 41

**PERSON/AGENCY RESPONSIBLE FOR THE INTERNAL RECEIPT OF COMPLAINTS** Valentina Maria Maurelli, Sr.  
HR Manager Italy& Greece.

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## 6.0 REVISION HISTORY

Rev. #	ECO #	Change Owner	Description of Change
01		Ilaria Paolini	Initial release.