



HUMAN RIGHTS360 NON-PROFIT CIVIL LAW PARTNERSHIP GENDER EQUALITY POLICY AND THE PREVENTION OF VIOLENCE AND HARASSMENT AT WORK

Introduction

The Human Rights360 Non-profit Civil Law Partnership (hereinafter "Human Rights360" or the "Organization"), since its establishment, has been committed to upholding and promoting principles and values of a high ethical level. This Policy on Gender Equality and the Prevention of Violence and Harassment at Work of our Organization (hereinafter referred to as "the Policy") clearly sets out the ethical principles and values as well as the code of conduct adopted by the Organization in the context of gender equality and the prevention of violence and harassment at work. Throughout its work, it has become clear that the Organization promotes equality, diversity, respect and team spirit in a positive and decent work environment. In this context, the Organization does not tolerate any discrimination or offensive behavior against employees, associates or third parties (moral, sexual or other forms of harassment, intimidation, persecution etc.) or social exclusion or unequal treatment due to nationality, race, color, ethnic or social origin, ethnic minority status, property, disability, age, sexual orientation, sex, genetic characteristics, marital status, religious or political beliefs or physical disabilities, veteran or citizenship status, as provided by the Greek and European legislation.

Human Rights360 shows zero tolerance towards any form of violence or harassment, intimidation, psychological abuse at work, aggressive or unjustified, offensive, harassing and generally undesirable behavior against any employee, co-worker, volunteer, beneficiary, associate of the organization, exercised by any colleague and/or a third party.

Any person who receives or witnesses incidents of discrimination, abusive behavior, unequal treatment, exclusion, violence, harassment, intimidation or persecution is required to immediately



notify this the Organization in accordance with the relevant procedure described in this Policy.

Purpose

The purpose and objective of this Policy is to ensure equal treatment of all staff of Human Rights360. To this end, Human Rights360 develops a merit-based system of recruitment, performance evaluation, and staff remuneration, and supports the continuous improvement of the skills of its staff by conducting capacity building and education programs for their professional development, thus providing the staff the same career and vocational rehabilitation opportunities.

Furthermore, this Policy aims to prevent any form of violence or harassment, intimidation, psychological abuse at work, aggressive or unjustified, offensive, harassing and generally undesirable behavior against any of the staff of the Organization or any third party.

Definitions

For the purposes of this Policy:

- (a) "discrimination" means any kind of conduct whose aim or effect constitutes a violation of the dignity of a person and his/her unequal treatment on grounds of race, color, religion or other belief, sex, age, national or ethnic origin, family or social status; , sexual orientation, identity or gender characteristics, physical or mental disability or chronic illness or medical condition in general, physical appearance, or any other element protected by Greek and European law, including indirect discrimination, i.e. any regulation or practice, which may at first glance seem neutral, but it puts people at a particular disadvantage because of their sex, sexual orientation and gender identity;
- (b) "violence" means any kind of conduct, act, practice or threat thereof which is intended, results in or is likely to result in physical, psychological, sexual or financial harm, whether it constitutes a marginal case or is manifested repeatedly;



(c) "harassment" means any kind of conduct whose purpose or effect constitutes a violation of the dignity of a person and the creation of an intimidating, hostile, degrading, humiliating or aggressive environment, irrespective of whether it constitutes a form of discrimination, or whether it includes gender-based harassment (of sexual nature) or discrimination based on other grounds,

Scope of application

This Policy establishes the basic principles with the aim to ensure equal treatment of all staff of HumanRights360, but also to prevent any form of violence or harassment within the Organization. It applies to the Administration of Human Rights360, its senior management, its employees, and generally all persons employed by Human Rights360 either under an employment contract or in any other contractual relationship.

It covers all the activities of Human Rights360 in Greece and abroad, regardless of the person who is responsible for carrying them out.

It complements the framework of the Code of Conduct and Ethics of Human Rights360 and operates complementary to the current legislation.

Basic principles

Human Rights360 recognizes the intrinsic value of all humans and, to this end, it seeks to promote respect for human dignity, which is achieved by equal treatment of all people, but also by the omission of any action or behavior that constitutes an act of violence or harassment.

The commitments of Human Rights360 are based on its principles, but also on the legislative and regulatory framework, Greek, European and international, on standards, conventions (e.g. the Convention on the Elimination of All Forms of Discrimination



against Women (CEDAW)), on relevant laws and global aspirations set out in the Sustainable Development Goals. HumanRights360 acknowledges that issues of gender inequality intersect with other forms of oppression based on unequal power relations, which may include racism, caste-based discrimination and discrimination based on racial or ethnic origin, discrimination based on age, sexual orientation and homophobia, religious discrimination, class-based discrimination, colonial history among others. Human Rights360 works with marginalized women and their allies to address structural barriers to the realization of women's rights and gender equality, social justice, peace, prosperity and a life without violence, and reconciliation with all forms of diversity.

Human Rights360 also rejects any form of violence and harassment in the workplace or elsewhere by anyone and towards anybody.

Persons responsible for the implementation of the Policy

- A. The General Assembly is responsible for the adoption and approval of this Policy, its periodic review, the monitoring of its implementation and the annual evaluation of its adequacy and effectiveness.

- B. The Team of Gender Equality and Prevention of Violence and Harassment at Work is defined by the General Assembly of Human Rights360, it establishes procedures, if required, for the implementation of the Policy, is responsible for monitoring and supervising the progress in the implementation of this Policy, proposes actions and corrective measures for the better implementation of the Policy and ensures the training of the staff of Human Rights360 on issues related to this Policy. It has three members and is composed of a representative of the employees of Human Rights360, a representative of the Management and an independent Legal Adviser with special knowledge and experience on issues of gender equality and dealing with violence and harassment in the workplace. Its term of office is two years and is not associated with or



influenced (nor does it necessarily coincide) with the term of office of the organization.

- C. Senior Managers and Managers of all Departments of Human Rights360 should support the implementation of the Policy, to ensure that every employee of Human Rights360 understands and implements this Policy and
- D. should inform the Team of Gender Equality and Prevention of Violence and Harassment at Work and the General Assembly if they find any discrepancies or failures in the Policy.
- E. All employees of Human Rights360, finally, must respect and strictly adhere to this Policy. It is the duty of all employees, regardless of the grade and / or position or form of service provided, to be vigilant regarding the responsibilities and commitments arising from this Policy, to avoid and prevent acts that are not in line with these commitments, and also a duty of the Human Resources Manager to inform the new entrants to the Organization about the obligations, commitments and principles dictated by this Policy.

Implementing measures – Commitments

For the implementation of the Basic Principles and for the successful application of the aims and objectives of the Policy, Human Rights360 undertakes to fulfill the following commitments while committing itself to be monitored, evaluated and reported, as part of its responsibility for transparency and liability:

1. Equality in accessing a job position and in initiating and terminating an employment relationship. Human Rights360 uses evaluation criteria both in the preparatory acts of recruitment (terms of recruitment, vacancies, etc.) but also in the selection, that do not directly or indirectly lead to discrimination based on gender or marital status (pregnancy, maternity, etc.), i.e. leading to gender-related discrimination.



2. Human Rights360 applies the principle of equal treatment of men and women for work of equal value. Working and employment conditions, training and education opportunities, promotions, as well as the design and implementation of staff evaluation systems are applied horizontally and in the same way to all staff of Human Rights360.

3. Human Rights360 ensures equality during the professional relationship and at the stage of its dissolution. It applies the principle of prohibition of termination of the employment contract when the termination is dictated by retaliation motives or as a response to any other behavior, due to e.g. non-compliance of an employee with sexual or other harassment against him/her, reaction, protest, complaint of the employee, his /her marital status, due to his/her children and dependents, or due to a testimony of an employee before a third party, Authority or Court related to this Policy.

4. Accessibility of all staff, men and women, to positions of responsibility and equal representation in these positions, as well as in Committees, Projects, Actions, etc. while maintaining a gender balance in the distribution of jobs and positions of responsibility of the staff and associates of Human Rights360 per level, department, Committee, etc.

5. Implementation of the Gender Equality Framework and regular control of the Gender Index at every stage of the work of Human Rights360, of the Projects and Programs it implements, in order to continuously monitor the equal representation and participation both sexes, and if they are not met, to decide their modification.

6. Raise staff awareness on gender equality and empowering women.

7. Assess the importance of work-life balance by supporting and accepting flexible forms of employment, facilitating the granting of leave and support for reintegration into working conditions within the workplace. Human Rights360, as part of its efforts to promote the reconciliation of working and private life for working women and men, is committed to encouraging and supporting parental care, supporting in practice its substantial intention to foster parenting and male involvement in child care. In addition to fully complying with the existing legal framework, Human Rights360: (a) provides working parents with the setting of at least one open day



per semester that a parent (male or female) can bring the child to work; at least 14 + 2 days of paternity leave for male employees, (c) gives at least (and in addition to the corresponding legal provision) 2 days per year to fathers with children up to 18 years of age to monitor school performance (regardless of granting the same leave to mother) and (d) allows remote work during pregnancy or to parents with children up to 8 years of age, or with children with disabilities, with home care after consultation with the Management of the Organization.

8. Ensure the principle of gender mainstreaming, i.e. the integration of gender perspective in the design and implementation of projects, but also in every manifestation of the general activity of Human Rights360.

9. Identify potential risks of unequal treatment due to gender or violence and harassment within the turnover of Human Rights360 and take precautionary measures to address them.

10. Creation of collaborations for the promotion of equal treatment and participation of both the Organization itself and motivation of its staff for its participation in organizations and collective initiatives for the promotion of gender equality.

11. Ensure that all the Policies, procedures and practices of the Organization are developed in the light of gender equality.

12. Preparation of an annual report on gender balance and diversity in staffing and governance structures, together with average remuneration levels.

13. Implementation of targeted strategies for the restitution of all kinds of gender inequality, both at the level of job position and at the level of remuneration.

14. Ensure that all annual business plans, job descriptions and performance plans reflect Human Rights360's commitment to gender equality.

15. Diffusion of the communication to all actors, sponsors and the public of the horizontal goal of Human Rights360 of equality of men and women in its work.

16. Take measures to prevent and address all forms of sexual harassment and violence and the sexual exploitation and abuse of children and vulnerable adults, raise staff awareness, develop and adopt effective reporting and monitoring systems.

17. Ensure that all areas of activity of Human Rights360, the Departments and their partners respect and uphold Human



Rights360's commitment to social justice, gender equality, respect and avoid any invocation or act of exclusion and reproduction of stereotypes.

18. Systematic negotiation with donors and funding partners for the implementation of actions in the context of the promotion of gender equality, equal treatment and the prevention of violence and harassment at work.

19. Analysis and reporting to competent authorities, if required, on data concerning employability and job distribution among the staff of Human Rights360 and taking of corrective actions, if and where required.

20. Education and training of staff and associates on the implementation of this Policy, on the risks involved and the ways to deal with them. Organizing and attending seminars on this subject by the staff, the executives, but also the Management of Human Rights360.

21. Continuous monitoring of the implementation of the Policy, evaluation of its implementation by all staff and preparation and publication annually and within the first quarter of each year of progress report, which will be approved by the General Assembly of HumanRights360.

22. Appointment of Ourania Papadopoulou as focal point for the support of female employees regarding issues of sexual harassment.

Risk Assessment

Behaviors of violence, harassment and discrimination can take place:

(a) in any place where the Organization operates, including public and private spaces and places where employees provide their work, receive remuneration, take breaks ,in particular for rest or food, in areas of personal hygiene and care, accommodation structures, etc.

(b) during all kinds of movements, travel, education, and work-related events and social activities or activities of the Organization; and

(c) in communications related to the work and activities of the Organization, including those made through information and communication technologies, such as text or oral messages and



comments, jokes, which could be interpreted as sexist, racist, intimidating, offensive or slanderous.

Reporting process

Human Rights360 establishes a special procedure for reporting stages of protection against harassment, violence and discrimination. This procedure outlines the immediate steps to be taken in the event of protection issues. In this context, a special complaint-reporting mechanism is established to identify and report problems and violations of this Policy, ensuring: a) direct communication and access to the person responsible for receiving the report; and, b) appropriate support and legal assistance when needed.

A. Persons entitled to submit reports

For the purposes of this Policy, reports may be submitted (and will be considered as in accordance with the procedures described herein) by any staff member of the Organization who in good faith reports an incident or incidents discovered in the course of his or her duties or in connection with them, which indicate acts of violence, harassment or discrimination. The report should preferably be written and without delay. However, reports may also be submitted through the relevant channels of the Organization by persons whose employment relationship with Human Rights360 has ended, but also by persons whose employment has not yet started, in case such behaviors were observed during the recruitment process, or other pre-contractual negotiation, as well as by third parties providing services to or on behalf of the Organization.

B. Cases to be reported

As the reporting process is widely recognized as an important tool for detecting cases of violence, harassment and discrimination, it is important for the staff to fully understand the cases in which they are ethically required to report and not to submit reports maliciously, for personal gain or otherwise for the defamation of colleagues.



C. How to submit reports

Any employee may submit a complaint, report or denounce an incident of harassment, violence or discrimination in writing to complaints@humanrights360.org, an e-mail address which is accessible to the legal representative, the Legal Adviser and the Regulatory Compliance Officer, but also orally. Reports and complaints can be sent from a working email address or from a personal or non-personal email address, if submitted anonymously. A report can also be submitted orally.

D. How to deal with reports

Reports and complaints are handled in a speedy way, with seriousness and complete confidentiality, and they are treated, as well as any data that will be submitted as evidence or data in the context of the investigation, by the above authorities, in complete confidentiality. Commenting on confidential information and / or spreading rumors is not tolerated. The same obligations bind the directors and the representatives of the Organization to the extent of their own responsibility and involvement. Human Rights360 receives, investigates and handles any report or complaint with zero tolerance for violence, harassment and discrimination. The reports / complaints are received by the Legal Adviser and the Regulatory Compliance Officer of the Organization and its legal representative, who are designated as the focal points (liaisons). The Committee handling reports/ malfunctions, assesses them within a reasonable time, examines them, carries out an investigation, and makes proposals by preparing a relevant report in terms of taking measures, or further actions (e.g. referral to competent authorities, court proceedings, etc.) to the General Assembly, which decides on it. Depending on the special circumstances, interim measures may be taken with the consent of the complainant, e.g. implementation of the teleworking for one of the two parties or temporary transfer of one of the two parties to another job position / office, until the examination of the report is completed.



Human Rights360 provides assistance and access to any competent public, administrative or judicial authority in the investigation of such incident or conduct, upon request.

Human Rights360, under the supervision of the Legal Adviser and the Regulatory Compliance Officer, keeps a written record of the reports submitted, including a complete file with the report, the actions taken to handle each case, the recommendation and the decision of the General Assembly of the Organization.

Consequences in case of infringement of the policy hereby

The examination of the report is completed with the decision on the measures that are found appropriate to be taken, which shall indicatively escalate from the compliance recommendation, the change of position, of working hours, of the place or manner of labor supply, up to the termination of the employment or collaboration relationship, on the reservation of the abuse of right according to article 281 Civil Code. On any case it is evaluated which measure is appropriate and proportionate on each case, to be taken against the defendant, in order any similar incident or behaviour to be prevented and not repeated.

Support and Protection of the reporting person– complaint

All employees are protected from victimization, unfavorable treatment and harmful change of circumstances because they have contributed in any way (e.g. complaint, testimony) to reporting, investigating a complaint of harassment, violence or even discrimination.

Respect for the principles of trust, confidentiality and protection of personal data is essential. The investigation follows a secure procedure for the exchange of information between the parties involved. Data protection and confidentiality extends over all the work and duties of the parties involved in the submission and examination of reports and complaints and continues after its completion. The current legislation on the protection of privacy and personal data is strictly observed.

If the applicant is in need for medical and psychological evaluation and support, the latter should be granted to him/her immediately. Moreover, the Organization should assist in every possible means



and support in every way employees who are victims of labor- and domestic violence.

The Team of Gender Equality and Prevention of Violence and Harassment at Work provides confidential and impartial guidance and support to employees with the aim to assist them in reporting on issues related to this Policy. The guidance of staff, especially at an early stage, contributes not only to the avoidance of reckless and unfounded reports, but also to the intolerance, already at an early stage and at its birth, of any form of violence, harassment, sexual or other discrimination, but also of any act offensive to the dignity of the employee.

Human Rights360 is committed to providing the highest possible support and the highest degree of protection from retaliation, which could arise as result of the report. No staff member of the Organization and no third party will be able to prevent an employee from submitting his/her report. Any form of threat or retaliation is prohibited and will be dealt with accordingly. In addition, if the claimant wishes to remain anonymous, the Organization should investigate the report, however anonymity entails a risk not fully understanding and examining the report, and increases the risk of frivolous, malicious or unreliable reports and information, as well as the risk of a wrong decision taken by the Management of the Organization. It is pointed out that the claimant's right of protection does not apply if he/she makes malicious reports, or reports for personal gain or reports for the defamation of his/her colleagues.

Publication of the Policy

This Policy is available to the staff of the Organization through the internal communication networks, and is posted in the workplaces of the Organization in Greek and English. In this way, Human Rights360 seeks to enhance transparency, as it provides an opportunity for anyone concerned to learn about and evaluate the core values, rules and principles that underpin the operation of the Organization.



Policy Review

The Administration of HumanRights360 reviews this Policy whenever necessary, but at least every three years, to ensure its adequacy with respect to the principles and rules applied by Human Rights360, as well as the applicable legal and regulatory framework. In case of change of the Policy, Human Rights360 takes care of the immediate disclosure of its revised text to the staff in any way it deems appropriate.