



FENCHURCH  
FARIS

# **Policy for the Prevention and Combating of Violence and Harassment in the Workplace & Complaint Handling Process**

**Manual 2026**

## Table of Contents

1. Purpose of the Policy - Corporate Commitment - Zero Tolerance Statement .....	4
2. Scope .....	5
3. Definitions.....	6
4. Assessment of Violence and Harassment Risks at Work.....	8
5. Measures to prevent, control, limit and address risks as well as monitor such incidents or forms of behavior .....	8
6. Information and Awareness Initiatives .....	9
7. Rights and Responsibilities of Employees, Management & Officers .....	9
8. Designation of a Reference Person for employee support and awareness.....	12
9. Employment Protection – Support for victims of domestic violence by all appropriate means or reasonable accommodation.....	13
10. Channels of Communication – Reporting Persons .....	14
11. Investigation and handling of complaints – Impartiality – Confidentiality – Data Protection .....	15
12. Policy Review.....	17



**Revision**

Section / Page	Version Number / Revision	Date	Description

**Status: 2026 Manual – Edition No.1**



## 1. Purpose of the Policy - Corporate Commitment - Zero Tolerance Statement

This policy establishes the core principles that underpin the company's commitment to maintaining a safe, respectful, fair work environment, free from all forms of violence, harassment and discrimination. As a reinsurance broker operating in a highly regulated, relationship-based and internationally interconnected industry, the company recognizes that professional integrity and ethical conduct are essential not only for the well-being of employees but also for maintaining the trust of clients, reinsurers, brokers, regulators and market partners.

The purpose of this policy is to establish a work environment that respects, promotes and ensures the human dignity and every person's right to a workplace free from any form of violence and harassment. Fenchurch Faris Ltd DECLARES that it acknowledges and respects the right of every employee to a working environment free from violence and harassment and that it DOES NOT TOLERATE any such behaviour, in any form, by any person. This policy emphasizes the company's stance on the prevention of gender-based violence, including violence against women, which may take many forms, including subtle or obvious and disproportionately affect individuals in professional environments worldwide.

The following policy is implemented and is aligned with articles 58-69, 507-508, 533 and 537 of the Presidential Decree. 62/2025 (A' 121) and its corresponding regulations - which incorporates Convention No. 190 of the International Labor Organization into national law, requiring all workplaces to adopt structured policies and mechanisms for the prevention and handling violence and harassment. Furthermore, the policy reflects recognized international standards in the financial and insurance sectors, including the principles of responsible business conduct, risk management standards and the expectations of regulatory authorities overseeing corporate governance and workplace culture.

By implementing this policy, the company reinforces its commitment to ethical behaviour, transparency, accountability and the protection of human dignity. It also ensures that employees understand their rights and obligations, as well as the channels available to express concerns. In particular, the purpose of the policy is not only to comply with legal requirements, but also to create a culture where respect, professionalism and safety are deeply rooted in the daily operations and long-term strategy of the company.



The company HAS A STRICT ZERO TOLERANCE POLICY AGAINST ANY FORMS OF VIOLENCE, HARASSMENT OR DISCRIMINATORY BEHAVIOR within the workplace or in any professional interaction related to its activities. This commitment extends to ensuring a safe, dignified and inclusive environment, where all individuals are treated with respect and dignity. The company ensures full confidentiality when handling complaints, actively protects individuals who raise concerns and guarantees that no act of retaliation will be tolerated under any circumstances.

## 2. Scope

The policy applies to all individuals employed by, associated with or representing Fenchurch Faris Ltd. Jordan (hereinafter referred to as "the Company") in any capacity. This includes, but is not limited to, all full-time and part-time employees, contract employees, independent contractors, salaried employees, third party service providers, trainees, volunteers, temporary staff, interns, job applicants, as well as executives and senior management.

The scope of this policy extends beyond the physical office to any location or circumstance where work activities take place or where an employee or representative of the company may be acting in a professional capacity. This includes industry conferences, client meetings, negotiations, site visits, networking events, corporate events and business trips both domestically and internationally. Given that reinsurance brokerage is an industry that relies heavily on professional interactions, negotiations and cross-border communication, maintaining respectful conduct in all these contexts is essential to safeguarding the company's reputation and business integrity.

All standards of professional conduct remain in effect during virtual meetings, teleconferences, video calls and all forms of digital communication, including email, messaging platforms, collaboration tools and company-approved communication systems. Any online offensive behaviour, such as harassment, adverse comments, inappropriate sharing of content, or bullying via electronic media, is treated with the same seriousness as violations that occur in person.

The broad scope of this policy ensures that the protections provided by this policy are not limited by geography, employment status or means of communication. At the same time, it reflects the company's commitment to creating a unified work environment where all individuals can interact safely, respectfully and without fear of any form of violence, harassment or discrimination.



### 3. Definitions

This section provides clear and standardized definitions of key terms used throughout the policy, ensuring that all employees, managers and executives share a common understanding of what constitutes unacceptable behaviour. Accurate definitions are essential to maintain consistency in incident reporting, investigation, enforcement and training. They also ensure compliance with articles 58-69, 507-508, 533 and 537 of Presidential Decree 62/2025 (A'121), ILO Convention 190 and internationally recognized safety and human rights standards applicable to organizations in the reinsurance mediation industry.

#### **Violence and Harassment**

For the purposes of this policy, "violence and harassment" means any conduct, act, practice or threat of conduct that has the purpose, effect or is likely to result in physical, psychological, sexual or economic harm, whether occurring as an isolated incident or repeatedly. This includes, but is not limited to, threats, coercion, intimidation, blackmail or any conduct that undermines a person's dignity or sense of safety in the workplace.

#### **Harassment**

"Harassment" means any conduct that has the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive environment, whether it constitutes a form of discrimination, and includes harassment based on gender or other discriminatory grounds. It can comprise of, but is not limited to, derogatory comments, disparaging or offensive remarks, aggressive behaviour, abuse of power, or any action that affects an individual's professional performance or well-being. Harassment can occur in person, in groups, online, or through written communication.

#### **Gender-Based Violence and Harassment**

"Gender-based violence and harassment" means forms of conduct related to the sex of a person, which have as their purpose or effect the violation of the dignity of that person and the creation of an intimidating, hostile, degrading, humiliating or offensive environment. These forms of conduct include sexual harassment as well as any form of unwanted verbal, psychological or physical conduct of a sexual nature, resulting in the insulting of the personality of a person, by creating an intimidating, hostile, degrading, humiliating or offensive environment around them. The same applies to direct or indirect discrimination based on sex, in relation to family status, regarding the rights of employees.

Harassment, sexual harassment, and any less favourable treatment resulting from the tolerance or rejection of such conduct constitute sex discrimination and are prohibited. Sex discrimination includes any less favourable treatment based on sex, gender



reassignment, pregnancy or maternity, retaliatory conduct and harassment, as well as conduct related to sexual orientation, gender identity or gender expression. Gender-based violence covers harmful practices that target individuals based on sex or gender identity and is a significant risk in professional environments, including finance and insurance.

### **Violence against Women**

Violence against women includes any act of violence, harassment or abuse — whether physical, sexual, psychological or economic — that is specifically directed against women or predominantly affects women. This may include unwanted advances, discriminatory behaviour, sexist comments, threats, stalking, exploitation of positional authority or any action that undermines the safety or equal participation of women in the workplace. Such behaviours may occur between colleagues, between management and employees, or through interactions with customers, brokers, reinsurers or other external partners.

### **Sexual Harassment**

It is any form of unwanted verbal, psychological or physical conduct of a sexual nature, resulting in an attack on the personality of a person, by creating an intimidating, hostile, degrading, humiliating or offensive environment around them. Examples include but are not limited to inappropriate or indecent comments, sexual jokes, innuendo, unwanted touching, intrusive personal questions, sending or displaying sexual material, repeated proposals or coercive behaviour for sexual favours. Sexual harassment can occur in person or through digital means, such as messaging apps, emails or social media.

### **Workplace**

For the purposes of the above definitions, “workplace” includes not only the physical premises of the company but also teleworking environments, commuting, business travel, client meetings, industry events, virtual interactions, and any location or circumstance where business duties are performed or where an employee or representative can reasonably be considered to be acting on behalf of the company.

By clarifying these definitions, the company ensures consistent understanding and application of the policy across all departments and levels of management. This clarity supports effective prevention, reporting, investigation and enforcement and helps maintain a culture of respect, equality and professionalism throughout the organization.



#### **4. Assessment of Violence and Harassment Risks at Work**

The Company identifies, records and assesses the risks associated with violence and harassment in the workplace, considering the inherent risk of its activity (reinsurance mediation/brokerage), the location and manner of work organization, as well as psychosocial risks, in accordance with the obligations for occupational risk assessment (P.D. 62/2025). Factors that increase exposure to violence and harassment are also considered, such as communication with third parties, meetings and travel, the use of digital media and hierarchical imbalances.

When assessing risks, the Company considers factors such as gender, age or other discriminatory characteristics, as well as specific groups of employees (e.g. newly hired employees). The assessment is reviewed periodically and when organizational structures, roles, methods or workplace change or findings emerge from reports, complaints or internal assessments.

#### **5. Measures to prevent, control, limit and address risks as well as monitor such incidents or forms of behaviour**

The Company implements administrative, organizational and, where necessary, technical measures to prevent, control, limit and address risks of violence and harassment, as well as monitor relevant incidents or forms of behaviour. In particular, the Company:

- Promotes respect, cooperation and open communication in the workplace.
- Maintains an institutionalized reporting/complaints procedure with support for victims.
- Ensures training and information for employees and executives with managerial duties.
- Takes technical and organizational security measures, as well as protective measures for victims as required.

The Company regularly evaluates the effectiveness of the implemented preventive and repressive measures and proceeds, where necessary, to review or update the risk assessment and the relevant measures, especially following incidents, reports or organizational changes.



## 6. Information and Awareness Initiatives

Information plays a key role in ensuring that all employees understand the standards of behaviour expected within the company, including appropriate workplace behaviour, its boundaries and rules of professional communication. In addition, it provides guidance to employees in recognizing unacceptable behaviour, such as harassment, discrimination or violence, and informs them on how to access the company's available reporting channels. By equipping staff with this knowledge, the company strengthens prevention, increases awareness and promotes a consistent understanding of legal and policy obligations across all staff.

The Company ensures timely and appropriate information to staff, in accessible formats, regarding:

- the risks of violence and harassment, including psychosocial risks,
- the applicable prevention and protection measures,
- the reporting and investigation procedures,
- the rights and possibilities provided by applicable legislation

To enhance awareness and prevention, the Company may organize information meetings, training programs or seminars and ensure the wide dissemination of this policy and the available reporting channels.

## 7. Rights and Responsibilities of Employees, Management & Directors

### 7.1 Rights and Responsibilities of Employees

Both employees and management share a collective and substantial responsibility for maintaining a safe, respectful and harassment-free work environment. All employees are expected to conduct themselves professionally, ethically and respectfully always, both within the office and during any work interaction with clients, brokers, reinsurers or external partners. Employees are also responsible for reporting any incident, concern or behaviour that may compromise safety or violate this policy, thereby contributing to the timely prevention and reduction of risks throughout the organization.

Executives and managers have an increased responsibility due to their leadership positions and their influence on the culture of the work environment. They must respond promptly and impartially to all reports or observations of violence, harassment or



discrimination, ensuring that investigations are conducted fairly, thoroughly and with full confidentiality. Management must also protect the rights of all those involved, adhere to the company's strict non-retaliation principles and implement appropriate corrective or preventive measures when necessary. This policy also covers issues related to domestic violence, in accordance with the provisions of Law 3500/2006 and any relevant legislation, recognizing the need to protect employees who may be affected by such incidents. The company is committed to providing support, discretion and appropriate safeguards to those affected, ensuring that domestic violence does not negatively impact their job security or career.

Through consistent and accountable leadership, management reinforces the company's commitment to a positive, safe and compliant work environment.

## **7.2 Possibilities and rights of the affected person**

The Company informs the staff that any person affected by an incident of violence or harassment during access to employment, during the employment relationship or even after the termination of the contract or employment relationship in the context of which the incident allegedly occurred, retains the following rights:

- a) Right to file a complaint within the Company
- b) Right to report to the Greek Ombudsman
- c) Right to appeal to the Independent Labor Inspection Authority, within the framework of its responsibilities (Citizen Service Line 1555).
- d) Right to access support services, such as the SOS Line 15900 for immediate psychological support and counselling for women victims of gender-based violence.
- e) Right to judicial protection.

Filing an internal complaint does not exclude or limit the right to appeal to any competent administrative or judicial authority. The Company and the competent persons are obliged to cooperate with any public, administrative, judicial or police authority that requests information within the framework of its legal responsibilities. The information collected during the handling of complaints is kept in a special file, physical or electronic, in accordance with the provisions on personal data protection (Law 4624/2019 and applicable legislation). The transmission of information is carried out only to the extent necessary for the exercise of the authorities' responsibilities.



### 7.3 Rights and consequences in the context of the employment relationship

According to articles 65–68 of Presidential Decree 62/2025:

- Any person affected by an incident of violence or harassment has the right, in addition to judicial protection, to appeal to the Labor Inspectorate and the Ombudsman, as well as to file a complaint within the company. In the event of a violation of the prohibition of violence and harassment, the employer shall take appropriate and proportionate measures against the person complained of, to prevent the recurrence of similar incidents. These measures may include recommending compliance, changing the position or mode of work or, if necessary, terminating the employment or cooperation relationship, without prejudice to the prohibition of abuse of rights, as well as any necessary organizational arrangement to avoid further victimization of the affected person.
- Any person who experiences an incident of violence or harassment retains the rights arising from labour legislation for the protection of his life, health and safety. In cases where it is considered that there is a risk to physical integrity, the person may take the necessary measures, in accordance with the prescribed procedures, and must inform the employer of the existence of the risk and the actions taken. If the cause of the risk ceases to exist, the employer may appeal to the Labor Inspectorate with a request for the resolution of the dispute.
- When an employer or a person exercising managerial rights or representing the employer violates the prohibition of violence and harassment when concluding or refusing to conclude a legal relationship or during its development, duration or termination, he violates labour legislation and administrative sanctions are imposed on him.
- Depending on the seriousness of the incident and under certain conditions, compensation may be granted to the affected person.
- Prohibition of retaliation: The termination of contract or termination in any way of the legal relationship, on which employment is based, is prohibited and invalid, as well as any other unfavourable treatment of a person, if it constitutes vindictive behaviour or countermeasure, for an incident of violence and harassment in accordance with article 66 of Presidential Decree 62/2025 (A' 121) and the other provisions of labour legislation.
- When the affected person claims to have been subjected to violence and harassment, the burden of proof that no circumstances of violence or harassment occurred lies with the accused, outside of criminal proceedings.

The reporting, investigation and enforcement process is described in detail in the corresponding sections of this Policy.



## 8. Designation of a Reference Person for employee support and awareness

### Reference Person (“Liaison”)

The Company designates a Reference Person (“Liaison”) for the prevention and response to violence and harassment at work, in accordance with article 62 of Presidential Decree 62/2025. The role of the Reference Person is to provide information and guidance and consists of:

- providing information to employees regarding this Policy,
- providing information on the options available in the event of an incident of violence or harassment,
- informing about the internal and external reporting channels and the relevant rights.

The Reference Person does not replace the complaint procedure nor act as a decision-making or sanctioning body, unless expressly provided for in this Policy.

Employees' access to the Reporting Person is direct and easy through the following communication channels:

#### **Reference Person:**

**Maria Theotokatou**

**Email:** [safeworkplace@fenfar.com](mailto:safeworkplace@fenfar.com)

#### **Alternate Reference Person:**

**Laoura Apostolou**

**Email:** [safeworkplace@fenfar.com](mailto:safeworkplace@fenfar.com)

The Reference Person is obliged to strictly observe confidentiality and protect the Personal Data that comes to his knowledge during the performance of his duties, as detailed below.



## **9. Employment Protection – Support for victims of domestic violence by all appropriate means or reasonable accommodation**

The policy also covers issues related to domestic violence, recognizing the need to protect employees who may be affected by such incidents. The company is committed to providing support, discretion and appropriate protective measures to those affected, ensuring that domestic violence does not negatively affect their job security or career, to the extent reasonably practicable. The Company recognizes the seriousness of the phenomenon of domestic violence and is committed, to the extent possible and within the framework of applicable legislation, to take appropriate measures to protect employment and support employees who have been affected by such incidents.

Upon request of the employee and with respect for confidentiality, the Company may consider on a case-by-case basis:

- taking measures to ensure employment and prevent adverse consequences due to the victim's condition,
- granting leave under defined conditions in accordance with legal provisions,
- implementing reasonable and proportionate adjustments, such as temporary modification of duties or other organizational arrangements,
- taking additional measures to protect the employee's safety in the workplace, if required.

Consideration shall be given to employees who have minor children or children with disabilities or serious medical conditions. The above measures are applied following an individual assessment, with a view to protecting human dignity, maintaining the employment relationship and the smooth operation of the Company.



## 10. Channels of Communication – Reference Persons

This section explains the procedures that employees must follow to report any incident of violence, harassment or inappropriate behaviour. It is emphasized that reporting channels must be clearly communicated, easily accessible to all staff and designed to protect the privacy and safety of the complainant. The company is responsible for supporting individuals who make a report, protecting them from retaliation and informing them about the stages of the investigation process, as well as handling each report promptly, fairly and confidentially, as will be discussed below.

The Company ensures the existence of safe, easily accessible and confidential communication channels for receiving reports or complaints regarding incidents of violence or harassment.

### **The following persons are responsible for receiving, examining and handling complaints:**

#### **Reference Person:**

**Maria Theotokatou**

Email: [safeworkplace@fenfar.com](mailto:safeworkplace@fenfar.com)

#### **Alternate Reference Person:**

**Laoura Apostolou**

Email: [safeworkplace@fenfar.com](mailto:safeworkplace@fenfar.com)

Also, incidents can be reported to the immediate supervisor, unless he/she is involved, in which case they can in any case be reported to Email: [safeworkplace@fenfar.com](mailto:safeworkplace@fenfar.com)

**Means – Communication channels:** The complaints can be submitted:

- in writing (via email) to [safeworkplace@fenfar.com](mailto:safeworkplace@fenfar.com).
- verbally (after a meeting) with the relevant persons as above,
- through the confidential reporting platform: <https://tips.hushline.app/to/safeworkplace>

The relevant persons handle complaints impartially, discreetly and with respect for Personal Data, taking the necessary measures for the security of the information. The complainants are informed of the receipt and progress of the complaint, while the affected person retains the right to appeal to the competent authorities at any stage, regardless of the progress or completion of the internal procedure.



## 11. Investigation and handling of complaints – Impartiality – Confidentiality – Data Protection

### 11.1 Investigation and handling of complaints – Impartiality – Confidentiality – Data Protection

Once an incident is reported, the company is obliged to immediately initiate an investigation and conduct it in a fair, neutral and fully confidential manner. The process must ensure that all parties involved can be heard, that relevant evidence is collected objectively and that the rights of all parties involved are respected throughout.

All findings must be clearly documented, and any corrective or disciplinary measures must be applied consistently and proportionately, reflecting the seriousness of the incident and the company's commitment to a safe and respectful working environment.

#### **Investigation process**

The investigation may include, as appropriate, assessment of the complaint, collection of information and data, obtaining explanations from the parties involved, possible access to company records and documents for investigation purposes, informing the relevant authorities and cooperating with other services of the Company for decision-making, always within the limits of competence and in accordance with applicable legislation.

#### **a. Temporary protection measures**

If there is a need for immediate intervention, appropriate and proportionate measures are taken to protect the affected person and prevent further deterioration of the situation, and may include, indicatively and on a case-by-case basis:

- temporary internal transfer or separation of those involved
- modification or reallocation of duties,
- temporary suspension of duties, in accordance with applicable legislation,
- taking measures to restrict access to specific areas or information systems,
- any other appropriate organizational measure deemed necessary to ensure industrial peace.

Temporary measures are taken based on the principle of proportionality, do not constitute a disciplinary sanction and do not prejudice the outcome of the investigation.



### **11.2 Confidentiality and protection of Personal Data**

- Persons participating in the investigation process are bound by an obligation of confidentiality.
- Personal Data collected in the context of the investigation are processed exclusively for the purposes of examining the complaint, in compliance with the principles of necessity, proportionality and purpose limitation, in accordance with applicable data protection legislation.
- Access to the case data is limited to strictly competent persons.

### **11.3 Conflict of interest**

If a conflict of interest arises or is suspected with respect to a person who has the authority to receive, investigate or evaluate the complaint, this person is obliged to declare the relevant conflict without delay and to refrain from any action within the context of the procedure. A conflict of interest is understood to mean the existence of a personal, family, professional or hierarchical relationship with any of the parties involved, or any other element that may call into question his objectivity and impartiality. In this case, another suitable and unbiased person is appointed to continue the procedure, to ensure the integrity and legality of the investigation. Referring to this section 8, the affected party has the choice either to contact another contact/competent person or to choose one of the channels available.

### **11.4 Consequences upon detection of violations**

If an employee or person employed in any employment or cooperation relationship violates the prohibition of violence and harassment, the employer is obliged to take the necessary, appropriate and proportionate measures, as the case may be, to prevent the recurrence of a similar incident or behaviour. Various forms of discipline may be applied depending on the severity of the incident:

- Verbal or written warning for compliance,
- Change or suspension from work duties,
- Termination of the contract or termination of the legal relationship on which employment is based,
- Imposition of disciplinary sanctions and/or reporting to the competent Authorities

The chosen measure is determined based on the principle of proportionality, considering the severity of the incident, any recurrence, the circumstances under which the incident occurred and the need to protect the working environment. In any case, the adoption of measures is subject to the prohibition of abuse of rights in Article 281 of the Civil Code. The imposition of the above measures does not exclude the application of any administrative, civil or criminal sanctions provided for by applicable law.



## **12. Policy Review**

The policy is reviewed annually to ensure that it remains current, effective and aligned with the company's business needs and legal obligations. However, the company may review it earlier if regulatory requirements, industry standards change, or if any incident, complaint or internal assessment indicates that modifications are necessary. This approach ensures that the policy continually reflects best practices, supports a safe and respectful work environment, and is readily adaptable to emerging risks or compliance requirements.