

POLICY & CODE OF CONDUCT:

PREVENTING AND COMBATING

VIOLENCE AND HARASSMENT

IN THE WORKPLACE

**METTMANN PUBLIC COMPANY LIMITED** 

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#### 1. LEGAL FRAMEWORK AND PURPOSE

The present Policy & Code of Conduct (the "Code") is established in line with the provisions of the Law on the Prevention and Combating of Violence and Harassment in the Workplace of 2025 (L.42(I)/2025) (the "Law"). As per the Law, the Company, in its capacity as employer, has the obligation to prepare the Code for the purpose of preventing and combating any forms of violence and harassment in its workplace.

The Company affirms its zero-tolerance stance towards all forms of violence and harassment and aims at providing a dignified workplace, which ensures equal opportunities to everyone, upholds human rights and provides safe and free from any violence and harassment working conditions to its employees.

All employees have, at the same time, the responsibility to cooperate in creating a work environment based on mutual respect, support those who report incidents of violence and harassment as much as possible, and cooperate in the relevant investigations.

#### 2. DEFINITIONS

Any reference to the below terms in the present Code, shall have the following meaning:

TERM	DEFINITION
Company	means METTMANN PUBLIC COMPANY LIMITED
Employee	means a person:
	(a) who works or is an apprentice, full-time or part-time, for a fixed or indefinite, continuous or non-continuous period, regardless of the place or form of employment (including home workers and teleworkers);
	(b) who is undergoing professional education or training;
	(c) who is employed in a form of undeclared work in accordance with the provisions of applicable law;
	(d) whose employment relationship has not yet begun, in the event that the violation of the provisions of the Law or this Code has been committed during the recruitment process or at another stage of negotiation in which they participated as candidates for employment before the conclusion of a contract or the commencement of employment.
Workplace	means the place where work is carried out or the place related to it or arising from such work and includes:
	<ul><li>(a) the offices designated by the Company;</li><li>(b) the public and private space surrounding the workplace, including the parking area and external spaces connected to the workplace;</li></ul>



- (b) a place where the employee is paid, rests, eats, or uses sanitary, washing and changing facilities;
- (c) a place where tours or journeys are made or where professional education or training, events or social activities related to work;
- (d) work-related communication, including communication enabled by information and communication technologies, email, video calls, internal platforms;
- (e) accommodation provided by the employer; and
- (f) travelling to and from work.

#### **Violence**

means an act, attempt, omission, practice or conduct, including threats, which has as its purpose or effect or consequence the possibility of causing physical, sexual, psychological or economic harm or damage to the victim, and which is carried out in the workplace and occurs either individually or repeatedly.

Offences provided for in the Criminal Code Law, Cap.154 and in the Prevention and Combating of Violence against Women and Domestic Violence and Related Matters Law of 2021 (L. 115(I)/2021 shall also be included under this definition.

#### Harassment

means any unwanted behavior to a recipient in the workplace which has as a purpose or result, the insult or violation of a recipient's dignity and the creation of an intimidating, hostile, humiliating or aggressive environment.

# Adverse change of working conditions

means an act or omission or general conduct of the employer or other person who is competent or responsible for determining or amending the conditions of employment, which causes direct or indirect, material, economic or moral harm to the employee or attacks, in any way, their personality or dignity;

The interpretation of any additional terms or expressions, which are not explicitly defined in this Code, shall be interpreted and governed in accordance with the Law.

# 3. SCOPE OF APPLICATION

This Code concerns the relationship of the Company and its employees, in the capacity of the Company as employer of the employees and governs:

- (a) employees' activities related to their employment and conduct in the workplace which may constitute violence or harassment:
- (b) company's acts or conduct which are the result of a complaint, report made or rejecting acts of violence or harassment in the workplace;
- (c) third parties' acts or conduct which constitute violence or harassment and these parties have a customer or contractual relationship or provide services in the workplace or to the Company or members of the public who visit the workplace or the Company.



#### 4. PROHIBITED CONDUCT

The below acts, omissions, practice or conduct, as well as any ancillary or related conduct in the workplace are <u>strictly</u> prohibited and they are punishable under the Law and the Code:

- Conduct that constitutes or causes violence to another person in their workplace.
- Conduct that causes harassment to another person in their workplace.
- Obstruction of or attempt to obstruct a complain in relation to violence or harassment in the workplace.
- > Termination or other adverse change of working conditions of a person who made a complaint or protest for conduct provided for in this Code or repulsed or reported violence or harassment in the workplace.

Violence may include, without limitation:

- Hitting, punching, slapping, poking or other means of unwanted physical contact or assault;
- Challenging an individual to fight;
- Engaging in unwelcome horseplay;
- Bringing weapons into the workplace;
- Threatening an individual verbally or in writing;
- Stalking or intimidating.

Harassment may include, without limitation:

- insulting, intimidating, demeaning, annoying, embarrassing or otherwise offensive behavior;
- inappropriate or unwelcome focus or comments on a person's physical characteristics or appearance;
- bullying and cyberbullying;
- isolation and shunning, gossip, rumors, negative blogging, insults;
- slamming doors, throwing objects and physical contact and;
- any conduct of a sexual nature;
- any form of discrimination or inequality based on age, gender, race, religion, sexual orientation, political beliefs, citizenship, marital status, family status, disability or any additional ground protected by law as such.
- any other harassment that affects an individual's dignity or psychological or physical integrity.



#### 5. COMPANY'S OBLIGATIONS

The Company shall have the following obligations towards its employees:

- a. The Company protects its employees from any act, omission, practice or conduct of any person in the workplace, which constitutes violence or harassment.
- b. The Company protects its employees from any act or conduct which is a result of submission of a complaint or initiation of any reporting procedure or repulsed or reported violence or harassment in the workplace.
- c. The Company shall implement precautionary measures to prevent and address violence and harassment in the workplace, and the present Code constitutes such measure.
- d. The Company draws up, updates and maintains the present Code. The Company provides to all new employees this Code as part of their onboarding and provides to existing employees periodic updates and refresher trainings.
- e. The Company takes all appropriate measures to stop, prevent the reoccurrence and to eliminate the consequences towards the victim of an incident of violence or harassment in the workplace, as soon as it becomes aware of it.
- f. The Company investigates and manages every complaint or report with zero tolerance towards violence and harassment in the workplace, with impartiality, confidentiality and protection of the personal data of the people involved in a manner that respects human dignity and does not hinder the receipt, investigation and management of such complaints or reports.
- g. The Company puts in place complaint investigation mechanisms that are safe, fair and effective. Please refer to section 7 COMPLAINS AND REPORTING PROCEDURE for further information.
- h. The Company appoints one employee, as it is announced from time to time to all employees, who receives training for the purpose of ensuring compliance with the Code and for the receipt and investigation of complains from employees, as per the Code (the "Designated Officer").
- The Company promotes a work culture against violence and harassment and takes measures for the prevention, control, limitation and compacting of violence and harassment, including training and informative sessions to its employees.

# 6. EMPLOYEES' OBLIGATIONS

The employees are expected to:

- a. Conduct themselves in full compliance with this Code.
- b. Thoroughly read, understand, and consistently apply the principles of this Code in their workplace activities.
- c. Refrain from engaging in any prohibited behavior or submitting false complaints related to incidents of violence or harassment.



- d. Cooperate with and adhere to the directives of the Company or its designated persons to ensure compliance with this Code.
- e. Participate in training programs to be able to respond appropriately to any incident of workplace violence.
- f. Inform the Designated Officer about any concerns for the potential violence or harassment incidents in the workplace.

#### 7. COMPLAINTS AND REPORTING PROCEDURE

# 7.1 Internal Complaints

All employees are encouraged to report incidents of violence and harassment of which they are victims or of which they become aware. In the case of reporting of a complaint for violation of the present Code, the below mechanisms shall be followed:

- a. Employees wishing to report incidents of a prohibited conduct under this Code, may submit a written or oral complaint to the Designated Officer or to their immediate supervisor or manager.
- b. The Designated Officer or manager or supervisor receiving the complaint, immediately initiate investigation and ensures that preliminary measures are taken to safeguard employees and limit the violence or the harassment as the case may be. In case of serious incident, the Designated Officer shall encourage the complainant to immediately report to the police, as may be appropriate.
- c. The Company formally acknowledges receipt of the complaint to the complainant within five (5) business days.
- d. The Company conducts confidential interviews with all relevant parties and witnesses and takes all actions required for the completion of a thorough investigation of the complaint.
- e. The Company documents the finding of its investigation and determines the appropriate disciplinary or corrective actions.
- f. The Company will inform the complainant of the investigation outcomes as soon as possible, considering the specific circumstances of the case, and communicate any measures taken to address the issue, prevent recurrence, mitigate consequences for the victim, and avoid further harm.

The Company ensures that its internal procedures for handling complaints related to prohibited conduct adhere to the following principles:

- > Clarity and Understanding: The procedures are clear, well-explained, and understood by all employees.
- Confidentiality and Impartiality: Complaints are handled with strict confidentiality and objectivity, ensuring a fair and unbiased process for all parties involved.



- ➤ Guidance and Support: The complainant receives adequate guidance and support throughout the process, ensuring they are informed and assisted appropriately.
- Protection of the Complainant: The complainant will not face victimization or retaliation as a result of submitting a complaint.
- Protection of Witnesses: Any witnesses to the alleged conduct will not face victimization or retaliation for providing their testimony.
- Timely Resolution: Complaints will be resolved within a reasonable timeframe from the date of submission, ensuring prompt action.
- No Substitution for Formal Procedures: These internal procedures do not replace or undermine the formal process for submitting and addressing complaints of harassment or violation.

# 7.2 External Complaints

In addition to the internal complaints' procedure outlined above, an employee, who believes that is affected by a violation of the present Code, may also refer to the following external sources:

# 7.2.1 Labor Inspector

The employee may submit a complaint to the labor inspectors, who are appointed by the Minister of Labor and Social Insurance, from time to time, to investigate the complaint.

The labor inspector either draws up minutes for the settlement of the case when both parties agree or prepares minutes stating its actions and findings for the investigation. The latter may be used for any future court proceedings before the Labor Dispute Courts in Cyprus by the parties involved.

During the investigation by the labor inspector, the Company or its representatives and the employee must provide to the labor inspector, upon request, any information or means which may serve as evidence to the violation of the Code.

This labor investigator proceeds with the above actions provided that no case has been initiated before the Courts.

## 7.2.2 Commissioner for Administration and Protection of Human Rights

The employee may submit a complaint to the Commissioner for Administration and Protection of Human Rights of Cyprus (the "Commissioner") in the case any claim falls within the authority of the Commissioner, pursuant to the Commissioner for Administration Law of 1991 (L.3/1991).

# 7.2.3 Employee Organizations

Any employee may also appoint any associations, workers' organizations or other organizations or legal entities, whose statutory purpose includes the elimination of discrimination and/or the promotion of equality between men and women to exercise their rights under the Code to file court proceedings or to make a complaint to the labor inspector of the Commissioner for and on their behalf.

# 7.2.4 Police Authorities

It is provided that in case of violation of the Law on the basis of commission of a criminal offence, the victim may also report the incident to the Police.

#### 8. MEASURES AGAINST PROHIBITED CONDUCT

#### 8.1. Internal measures

In response to incidents of prohibited conduct, the Company may take any of the following actions, depending on the nature, severity, impact of the incident, the contractual relationship and applicable laws:

- > Formal Warning: A formal written warning to the individual responsible for the incident, outlining the nature of the violation or possible violation under investigation, expectations for behavior, and the potential consequences of further misconduct.
- > Suspension: Imposition of suspension, as a temporary corrective measure while an investigation is underway or as a disciplinary action following a violation.
- > Reassignment: The individual may be reassigned to a different role within the Company after a thorough assessment of the situation.
- > Termination of employment/contractual relationship: The Company may terminate the individual's employment or contract without any right for any compensation towards the person responsible for the incident, pursuant to their contractual relationship and applicable laws.
- Law Enforcement or Regulatory Authorities: If the violation constitutes a criminal act or breaches the Law or any other relevant laws or regulations, the Company may refer the matter to the appropriate authorities for further investigation and potential legal action.

#### 8.2 External measures

#### 8.2.1 Court

In addition to the above measures, any employee who believes they have been affected by a violation of the provisions of the Law has the right to file a claim before a competent court, even if the employment relationship in which the alleged violation took place has ended.

The Company encourages individuals to seek legal advice and support as needed to fully understand their rights and the legal avenues available to them.

#### 9. USEFUL CONTACTS

# Office of the Commissioner for Administration and the Protection of Human Rights (Ombudsman)

Address: Era House, Diagorou 2, 1097 Nicosia, 22166, 1518 Nicosia

Tel: +357 22 405500 / 501 Fax: +357 22 672881

Email: ombudsman@ombudsman.gov.cy

www.ombudsman.gov.cy

# Labour Inspectorate - Ministry of Labour and Social Insurance

Address: 77 Kallipoleos Avenue, 2100 Nicosia, Cyprus.

Tel: +357 77778577 Fax: +357 22806209 Email: info@dli.mlsi.gov.cy

https://www.gov.cy/mlsi/ypiresia-epitheoriseon/

# **Cyprus Police**

Address: Police Headquarters, Evangelou Floraki Street, P.C.1478

Tel: +357 1460 or +357 22808080 Email: police@police.gov.cy

https://www.police.gov.cy/police/police.nsf/index\_gr/index\_gr?opendocument

# **10. CODE REVIEW**

This Code and the procedures will be reviewed annually, or more frequently, if necessary, upon advice of the Designated Officer, the Company, or if there is a change upon risk assessment performed by the Company or in any other circumstances that may affect the health and safety of the employees.

Approved by:

NATALIA NAZAROVA, Directo

Date of Approval: