

ANTI-DISCRIMINATION, ANTI-HARASSMENT AND ANTI-BULLYING POLICY

T&T Travel Consultants S.M.P.C.

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HR-POL-002	1.0	DPO / ISMS & Privacy Manager	Managing Director	Internal	July 20 th , 2026 / annual or material change

1. Commitment and scope

T&T is committed to equal opportunity and a workplace in which people are treated with dignity and respect. Discrimination, harassment, sexual harassment, bullying, victimization and retaliation are prohibited. This policy applies to work, recruitment, training, travel, events, remote work, communications, social media connected to work and interactions with customers, suppliers and visitors.

2. Responsibilities

Role	Responsibilities
Managing Director / management	Lead by example, provide resources, avoid retaliation and ensure fair response.
Managers	Act on concerns, do not investigate informally beyond authority, preserve privacy and escalate.
Personnel and contractors	Treat others respectfully, cooperate honestly, avoid gossip/retaliation and report concerns.
HR-designated investigator	Triage, protect parties, investigate impartially, document and recommend action.
DPO / Privacy Lead	Advise on lawful handling, access, retention, rights and special-category data; not the merits decision-maker unless separately appointed.

3. Prohibited conduct

- Direct or indirect discrimination based on characteristics protected by Greek/EU law.
- Unwanted conduct that violates dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
- Unwanted conduct of a sexual nature, sexual advances, requests, messages, images, gestures or contact.
- Repeated or serious misuse of power, intimidation, humiliation, exclusion, malicious rumor or unreasonable undermining.
- Adverse action, threats or pressure because a person raised, supported or was believed likely to raise a concern.

Assessment considers applicable legal definitions, conduct, context, severity, repetition, power relationships and reasonable effects; it is not determined solely by intent or by a single person's subjective view.

4. Reporting routes

- Direct manager, unless involved.
- Another manager or the Managing Director, contacted through T&T at +30 210 8055310 or the registered address.
- For privacy of complaint records: dpo@tntconsultants.gr.
- Immediate danger or suspected crime may be reported to emergency/law-enforcement services.

5. Response procedure

1. Acknowledge and assess immediate safety, separation, non-retaliation and evidence-preservation needs.
2. Explain options, privacy limits, expected stages and support. Informal resolution is voluntary and is not used where inappropriate.
3. Appoint an impartial investigator without conflict; define scope and interview/record plan.
4. Give relevant parties a fair opportunity to respond; share information only where necessary.
5. Reach findings using the applicable standard, decide proportionate action and communicate outcomes to the extent lawful.
6. Monitor retaliation, implement workplace corrections and retain records under the approved schedule.

6. Privacy and records

Complaint and investigation information is Restricted. Access is limited to authorized persons with a need to know. T&T cannot guarantee absolute confidentiality, but will limit disclosure to investigation, protection, legal, regulatory and disciplinary needs. Records may contain special-category or criminal-allegation data and require documented lawful conditions, secure storage, retention, legal hold and rights handling.

7. Training and protection

Personnel receive induction and refresher training; managers receive response training. Good-faith reporters, witnesses and participants are protected against retaliation. Deliberately false allegations may be addressed, but an unsubstantiated good-faith report is not misconduct.

8. Review and related documents

- T&T Code of Conduct (HR-POL-001).
- People Security, Awareness and Disciplinary Policy (§21 of the ISMS/PIMS).
- Information Classification and Handling Policy (§9).
- Privacy and Personal Data Protection Policy (§19).
- Applicable Greek employment, equality, health and safety and whistleblowing requirements.