

# Code of Conduct

## Reporting concerns

Complaints, Allegations and  
Anti-Harassment Policy

Last updated: September 2021

**Build trust with each other**

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# 1. General provisions

## 1.1 Background

PwC Greece is committed to ensuring that it has appropriate policies and procedures in place to address any concerns, complaints and/or allegations by Partners or staff members, that PwC Greece or any of our people have failed to comply with appropriate personal conduct, professional, ethical, regulatory or legal requirements, or its own systems of quality control. This includes any violations of relevant PwC Network Standards and/or PwC Global Policies and/or PwC Greece Policies, as well as other concerns that arise during the course of doing business.

In line with the **PwC Code of Conduct** each one of us, no matter what our level or role, is empowered to speak up when dealing with behaviour, or facing a situation that doesn't seem right. Each of us has the responsibility to report and express our concerns, and to do so in good faith, fairly, honestly and professionally.

PwC is committed to caring for and protecting our people against harassment, discrimination and retaliation.

## 1.2 Applicability

This Policy is intended for and applicable to Partners and staff members of the member firms that comprise PwC in Greece (the "Firm"). Application of this policy also includes temporary personnel, independent contractors and their staff members, interns, lawyers, former employees, job applicants and generally any person that relates to PwC in any other way. PwC will not tolerate from any of the above person any form of discrimination or harassment that violates this policy.

This policy applies:

- (a) In any workplace either in public or private spaces.
- (b) During work-related trips, travel, training, events or social activities.
- (c) Through work-related communications, including those enabled by information and communication technologies.
- (d) When commuting to and from work.

## 1.3 Definitions

For the purposes of this Policy, the terms listed below will have the following meanings:

Firm	PwC in Greece (comprising: PwC Auditing Company S.A., PwC Business Solutions S.A., PwC Accounting S.A., M. Psylla V. Vizas G. Katrinakis Law Firm)
Governance Body	PwC Greece's Governance Body which will be informed on any Ethics Committee decisions.
Ethics Committee	An appointed committee whose duty is to consider and investigate Complaints and Allegations so as to inform the Governance Body on their handling. The Ethics Committee consists of the BCL (see below) and three other members, each one representing one of the Lines of Service.
Code of Conduct (or the "Code")	The Global Code of Conduct and local supplement issued by the PwC Network and PwC Greece respectively. The Code describes a common set of expectations for our conduct, a key element of which is that we abide by applicable laws and regulations. To the extent any local law or regulation is more restrictive than this Code, local law or regulation prevails.
Policy	This policy, titled "PwC Code of Conduct: Reporting Concerns – Complaints, Allegations and Anti-Harassment Policy."
Ethics, Business Conduct & Anti-Corruption Leader (also referred to as "BCL" in this document)	An appointed Senior Executive of the Firm whose primary role is to drive an ethical culture within their territory and help facilitate compliance with the Ethics and Business Conduct element (10.1) of the Ethics & Compliance Network Standard (Michalis Pikis, who has been appointed as Ethics, Business Conduct & Anti-Corruption Leader).

Ethics and Business Conduct Officer (also referred to as “BCO” in this document)	Officer reporting to the BCL, who is in charge of related day to day tasks and ensuring the smooth operation of the Ethics Helpline and the implementation of the Firm's Code of Conduct, who can also receive reports and advise potential reporters. Angie Phountis holds the role of Ethics and Business Conduct Officer.
Reporter	Any person filing a Report or Inquiry
Reportee / Subject	A person upon which a report is filed
Report	Reporting through one of the Channels provided of any of the items defined below, and specifically a Concern, Complaint or Allegation in relation to Personal Conduct, Business Conduct, including Suspicion of business wrongdoing.
Concern, Complaint or Allegation in relation to Personal Conduct	Coming forward with a situation and/or incident with which a staff member has come across behaviour within the workplace that is inconsistent, with our Code of Conduct such as violence and harassment, including but not limited to gender-based harassment/sexual harassment and bullying, discrimination, abuse (of substances or other), or disrespectful behaviour.
Violence, harassment and gender-based harassment	As defined in the existing Greek Labour law (currently L. 4808/2021)
Concern, Complaint or Allegation in relation to Business Conduct	Coming forward with a suspicion of business wrongdoing; issues relating to professional, ethical, regulatory or legal requirements, or the firm's own system of quality control; including any violations of relevant Network Standards and Policies within the Firm's territory, as well as other concerns that arise during the course of doing business.
Suspicion of business wrongdoing	<p>A reasonable suspicion of (threatened or planned) wrongdoing affecting the Firm, and consisting of any or all of the following instances:</p> <ul style="list-style-type: none"> <li>• a (threatened or planned) criminal offence;</li> <li>• a (threatened or planned) violation of a rule of law, rule of conduct and/or any work or other instruction, as formally adopted or issued (directly or indirectly) by the Firm;</li> <li>• any complaints made in writing about the performance of the statutory audits carried out;</li> <li>• any breaches of the provisions of the Greek Law 4449/2017 on statutory audits of annual accounts and consolidated accounts and, where applicable, of Regulation (EU) No 537/2014 on specific requirements regarding statutory audit of public interest entities.</li> <li>• any intervention in the carrying-out of a statutory audit in any way which jeopardizes the independence and objectivity of the statutory auditor who carries out the statutory audit on behalf of the audit firm from Firm's owners or shareholders, as well as the members of the administrative, management and supervisory bodies of the Firm, or of an affiliate of the Firm;</li> <li>• any incident which has or may have, serious consequences for the integrity of the Firm's statutory audit activities;</li> <li>• threats to public health, safety or the environment;</li> <li>• (threatened or planned) deliberate supply of incorrect information to the public authorities;</li> <li>• (threatened or planned) waste of the Firm's money or funds;</li> <li>• knowledge of consistent filing of inaccurate expense claims</li> <li>• (threatened or planned) deliberate destruction, manipulation or withholding of information about any of the above incidents from third parties.</li> </ul>

## 1.4 General

We are all empowered and expected to speak up and this Policy outlines the process for doing so. Subject to any evidence to the contrary, a Reporter filing a Report in accordance with this Policy will be deemed to be acting in good faith and not to be out to gain any purely personal advantage. We are all under an obligation to exercise professional scepticism and raise issues as they occur or are identified. And to do so fairly, honestly and with respect to the rights and privacy of others who may be involved. PwC is committed to protecting individuals against negative consequences where they raise concerns in good faith.

In turn, any individual receiving an inquiry or report is responsible for addressing the issue brought to their attention and informing the Ethics, Business Conduct & Anti-Corruption Leader.

Those who violate this Policy and associated procedures will be subject to appropriate corrective measures and / or disciplinary action (according to the Firm's Internal Regulations, as and where applicable), up to and including dismissal. Disciplinary measures will also apply to:

- Anyone who directs or approves transgressions (violations) or has knowledge of them and does not move promptly to correct them.
- Any person who retaliates in any way against another person raising a concern in good faith (irrespective of whether the investigation substantiates the allegations).
- Any individual who files a report in bad faith, who abuses the procedures by raising a concern when they know it is untrue.

## 1.5 Ethics Committee

The Ethics Committee has been set up to consider and investigate concerns, complaints or allegations, and inform the Governance Body on their handling. The Ethics Committee consists of the BCL and three other members, each one representing one of the Lines of Service.

If the matter that is being considered by the Ethics Committee relates to Corruption issues involving a partner or staff member employed by one of the PwC entities in Greece (refer to definition of "Firm" above) and that entity is not represented by the members of the Ethics Committee, then that specific entity representative will also attend the Ethics Committee and participate in the discussion on that particular matter and will also vote on the action to be taken for that particular matter.

The BCL will be presenting matters to the Ethics Committee, to the Territory Chief Risk Officer, OGC and HC representatives who are also permanent participants. Other participants will be attending as and when necessary depending on the nature of each matter that is being assessed.

Decisions by the Ethics Committee will be adopted following overall consensus being reached by all of the participants and failing that by a majority vote of the members. The Ethics Committee will inform the Governance Body of its decisions. In the event that the Ethics Committee fails to arrive at a decision due to equal votes in favour of and against a specific action, then the case is elevated to the Governance Body for final decision.

## 1.6 Ethics, Business Conduct & Anti-Corruption Leader

The Ethics, Business Conduct & Anti-Corruption Leader will be responsible for implementing and facilitating compliance with the Code of Conduct and all related policies.

The duties of the Ethics, Business Conduct & Anti-Corruption Leader will be to serve the Firm in that capacity, and:

- I. to ensure that this Policy is implemented uniformly;
- II. to supply information about this Policy and its application to the Reporter and others upon request;
- III. to provide the Reporter, upon request, with substantive and/or procedural advice and guidance when the Reporter has a concern or complaint to make or has a (possible) suspicion of business wrongdoing or is filing a Report; and to act as a sounding board for the Ethics Committee.

## 1.7 Preventative and detective measures against personal and/or business misconduct

The Firm has established a number of mechanisms to avert or identify early personal and/or business misconduct, including:

- a. Having available to all staff and partners the:
  - i. Code of Conduct (CoC),
  - ii. Local supplement to the CoC,
  - iii. Code of Conduct Reporting Concerns – Complaints & Allegations & Anti-Harassment Policy, and
  - iv. Ethics Helpline.
- b. Delivering appropriate training, including:
  - i. annual Ethics and Compliance and other training to all Partners and staff (refresher training),
  - ii. Ethics and Compliance training to all new joiners.
- c. Providing other platforms to staff to express their concerns, including the Global People Survey and the Global Departure Survey.
- d. Conducting anonymous surveys periodically.

## 2. Reporting your concerns

### 2.1 Filing a report or inquiry & available resources

Partners or Staff members who come across personal or business conduct issues, as defined above, should raise a concern by using one of the three available channels:

**In person:** Any person may contact, consult with and if deemed necessary report to the BCL, BCO, or an Ethics committee member. In particular, Partners or Staff members who come across a personal conduct issue can contact and consult their Supervisor or their Human Capital Business Partner as well.

**Ethics Helpline - Online ([EthicsPoint](#)):** Any person, including third parties, may also report a concern, complaint and/or allegation or ask a question electronically through the Global Ethics Helpline. Upon registering your concern or question, the Firm's BCL is notified. The procedure described below is followed.

**Ethics Helpline - By Phone (800 848 1553):** Any person, including third parties, may also report a concern, complaint and / or allegation or ask a question through the Global Ethics Phone line. Call centre personnel will register your concern or question and the Firm's BCL is notified. The procedure described below is followed.

Inquiries or reports may be made anonymously if preferred. Anonymity will be maintained within the limits of the law and to the extent possible in order to facilitate the investigation process.

If something doesn't feel right, or you have reservations about behaviour that might be inconsistent with the PwC Code of Conduct and our Values then report your concern, by using any of the channels above that are available to help you. Choose one that you are comfortable with to assist in working through the situation.

Furthermore, every person who has been subjected to violence and harassment has the right:

- to legal protection,
- to refer to the Labour Inspection Body ("Επιθεώρηση Εργασίας") and to the Citizens' Ombudsman ("Συνήγορο του Πολίτη"), as well as to report internally as per above.
- To request a change of location and/or working hours.
- To abstain from work for a reasonable amount of time, without any adverse effect, including on salary, if according to his/her reasonable belief he/she perceives that there is a serious threat to his/her life, health or safety.
  - This is especially applicable when the necessary available measures for his/her protection have not been taken, or when the measures taken are not suitable to stop behaviours of violence and harassment.
  - In this respect, the person that is abstaining from work is obliged to inform the Firm in advance and in writing, stating the incident of violence and harassment and the facts that support his/her belief that there is a threat to his/her life, health or safety.
- To claim, in a Court of Law, full compensation covering any losses or damages.

The contact details for the Citizens Ombudsman (“Συνήγορος του Πολίτη”) are:

17, Chaklokondyl Street, 104 32 Athens  
E-mail: [press@synigoros.gr](mailto:press@synigoros.gr)  
tel: (+30) 213 1306 600

The contact details for the Labour Inspection Body (“Σώμα Επιθεώρησης Εργασίας (Σ.ΕΠ.Ε)”) are available at this [link](#).

The Firm will always be at the disposal of the competent public authorities in order to assist, in any way, with the investigation of any reported incidents.

## 2.2 Handling a concern, complaint and/or allegation

Concerns, complaints and/or allegations are investigated and addressed in an appropriate way.

The Ethics, Business Conduct & Anti-Corruption Leader, in consultation with the Ethics Committee and other parties<sup>1</sup> will decide the course of action. The Partner or Staff member raising the issue or concern will be informed of the outcome. The identity of the person raising the issue or concern will remain confidential (if confidentiality is not possible due to the nature of the issue raised, every attempt will be made to limit disclosure of the individual's identity)

The Ethics, Business Conduct & Anti-Corruption Leader will then make recommendations to the Ethics Committee, in which he will state whether:

- the facts brought forward constitute a breach as described in this policy<sup>2</sup>
- the concern, complaint and/or allegation will lead to management actions in order to address the issue;
- remediation or disciplinary action is required and if so, what measures would be the most appropriate;
- the issue or concern is justified, partly justified or unjustified, and if unjustified whether it is deemed that the report was made in good faith or not
- any identified deficiencies exist in the design or operation of the Firm's quality control policies and procedures.
- an external party should be informed

The Ethics Committee will assess the BCL's recommendations and make a decision on the concern, complaint and/or allegation. Where necessary, this decision will be reported to the Governance Body. The Partner or staff member making the report and the person or persons identified in the complaint and/or allegation will be informed of the outcome. Indicative actions decided by the Ethics Committee based on their severity/repetition are:

Category 1 (Lesser severity and one -off)

- Written warning
- Supplemental training/coaching

Category 2 (higher severity or repeat offenders of category 1)

- Exclude from annual merit increase/bonus/promotion process
- Other financial sanction
- Reduction of role scope
- Work subject to additional oversight (increased scrutiny)
- Change of workplace and/or working hours and/or position

Category 3 (higher severity or repeat offenders of either category 1 or 2)

- Removal of signing rights
- Termination of employment
- Other legal action

For instances where a breach on Independence has been confirmed, disciplinary actions will take place as per Matrixk Section 21.01.340.

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<sup>1</sup> The Ethics, Business Conduct & Anti-Corruption Leader, will be in consultation with the following other parties, depending on the nature of the issue:

For Personal Conduct matters, in consultation with HC if relevant

For Business Conduct matters, in consultation with OGC, Chief Risk Officer and/or the Regulatory and Independence Leader (as is relevant)

<sup>2</sup>Breaches, as described in this policy, are:

For Personal Conduct matters, the incident is deemed to be in violation of current PwC Code of Conduct, policies, rules, regulations and laws; For Business Conduct matters the facts brought forward constitute a business wrongdoing as meant in this Policy and the incident is deemed to be in violation of current PwC Code of Conduct, policies, rules, regulations and laws or the firm's own system of quality control; including any violations of relevant Network Standards and Policies within the Firm's territory, as well as other concerns that arise during the course of doing business

As regards to disciplinary proceedings and disciplinary sanctions, the provisions of the Firm's Internal Regulation (where applicable) shall apply.

With respect to Independence breaches, an annual report containing an overview of the consequences of the reported breaches, including any measures taken to address such breach and/or modifications performed to the internal quality control system, will be prepared and communicated internally by the Regulatory and Independence Leader (here after 'RIL'), or a Senior Independence Office Team Member that the RIL specifically appoints, at the end of the financial year as part of the compliance testing process.

All issues raised will be thoroughly investigated and appropriately resolved. Actions taken to investigate and address an issue raised are adequately documented as appropriate, depending on the severity of the case. Subject matter experts will be consulted as required and complex or serious matters will be escalated to the appropriate management level. The BCL and BCO will facilitate the investigation process in order to ensure that each concern or issue is addressed appropriately.

## 2.3 Follow up action

The BCO is responsible for monitoring the implementation of any actions decided by the EC and to report on progress to the EC, following liaison with HC and relevant other individuals. All actions decided by the EC are followed up until resolution.

## 3. Confidentiality and anonymity

Any person who is in any way involved in the handling of a reported issue must keep all information to which they become privy on account of their involvement strictly confidential.

A person raising an issue or concern will remain anonymous at his/her request, provided that this does not run counter to any statutory obligations or prejudice of the Firm's justified interests. Once the report has been conclusively dealt with, all persons involved must return all data and records which they have had at their disposal in connection with the handling of the complaint or allegation to the Ethics, Business Conduct & Anti-Corruption Leader or, as the case may be, to the Ethics and Business Conduct Officer, ensuring that the data and records are kept on file.

The Helpline is designed to secure anonymity of the person submitting the inquiry if the person wishes so.

## 4. Can a Reporter be subject to any disciplinary or other punitive action?

Irrespective of whether the investigation confirms the allegations, no person who comes forward in good faith will be subject to any disciplinary or any other punitive action, solely as a result of raising such concerns, except as set forth in the paragraph below.

However, a person who abuses the procedures by raising a concern they know to be untrue or uses the process for inappropriate purposes will be subject to disciplinary or other punitive action.

If a Partner or staff member suspect that a business wrongdoing has occurred and fails to report his/her suspicions or does report them in a way other than in accordance with the terms of this Policy, he/she will be acting in violation of PwC's Code of Conduct and related internal PwC guidelines.

## 5. Anti-retaliation

PwC does not tolerate retaliation. A person who retaliates in any way against another person raising a concern will be subject to disciplinary or other punitive action. (irrespective of whether the investigation substantiates the allegations).

## 6. Assessment of potential hazards and risks of harassment within the workplace

The Firm has taken all reasonable measures and in cooperation with the Firm's doctor (Ιατρός Επαστίας), to prevent potential hazards and risks of harassment with the workplace. Additionally, the Firm provides all Partners, staff and family members with a 24/7 anonymous support line (Hellas Assistance Programme).

## 7. Measures for victims of domestic violence

The Firm will assist any employee being victim of domestic violence, with all appropriate means or reasonable efforts to accommodate, which may include: Flexible working arrangements, and/or safety measures in the workplace (e.g. secure parking position, work in a non-isolated area)

For any additional information or clarification regarding this policy, interested parties may communicate with the BCL, the BCO and the Human Capital Business Partners ('HCBPs'). The contact details are: BCL Michalis Pikis ([Michalis.pikis@pwc.com](mailto:Michalis.pikis@pwc.com)), BCO Angie Phountis ([angie.phountis@pwc.com](mailto:angie.phountis@pwc.com)), HCBPs for Assurance Vasso Fouska ([yassiliki.fouska@pwc.com](mailto:yassiliki.fouska@pwc.com)), for Advisory Alkistis Danilatou ([alkistis.danilatou@pwc.com](mailto:alkistis.danilatou@pwc.com)), for TLS & IFS Fani Maxilari ([fani.maxilari@pwc.com](mailto:fani.maxilari@pwc.com)).



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