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7th National Report on the implementation of the European Social Charter

submitted by

THE GOVERNMENT OF GREECE
Articles 2, 3, 4, 5, 6, and 20

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8th Greek Report on the Revised ESC

[ARTICLES 2,3,4,5,6 & 20]

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Article 2 – The right to just conditions of work

Article 2§1 - Reasonable daily and weekly working hours

a) *Please provide information on occupations, if any, where weekly working hours can exceed 60 hours or more, by law, collective agreements or other means, including:*
• information on the exact number of weekly hours that persons in these occupations can work;
• information on any safeguards which exist in order to protect the health and safety of the worker, where workers work more than 60 hours.

Regarding working time limits, the following apply:
1. According to **Article 189** of the Labour Code (P.D. 62/2025, G.G. A΄ 121):
"In every sector and branch of economic activity, full-time employment is set at forty (40) hours on a weekly basis, which may be distributed on a five-day or six-day work week, in accordance with the provisions in force, the collective labour agreements or arbitral awards. In undertakings applying five-day work week model, the full contractual hours of work are eight (8) hours per day. In undertakings applying six-day work week model, the full contractual hours of work are six (6) hours and forty (40) minutes per day. By virtue of labour collective agreements, arbitral awards or individual employment contracts, reduced full-time working hours on a daily or weekly basis may apply».
From the above-mentioned provision it follows that in all occupations working hours are set at forty (40) hours per week.

2. This limit may be exceeded only for one of the reasons restrictively referred to in the law. More specifically, **article 193** of the Labour Code stipulates the following:
« *Pursuant to article 187, it is permitted to exceed the maximum limit of daily working hours in the following cases:*
a) to carry out urgent work whose performance is necessary to prevent imminent accidents, organise rescue measures or deal with unforeseen damage either to the undertaking's materials or premises or buildings.
b) to carry out temporary emergency work or highly urgent work to provide services to the public.
c) to carry out urgent repairs on sea, land and air means of transport or when there are delays in all types of transport services.
d) to deal with excessive accumulation of workload.
e) to carry out work on the eve of public holidays.
f) to carry out preparatory or additional work that, due to its nature, must be performed outside the normal daily working hours of the enterprise or undertaking.
g) to make up for working hours lost because of collective stoppage of work, due to:
ga) sudden causes or force majeure (sudden damages to materials, power cuts, general lack of raw materials, natural disasters),
gb) public or local holidays, except Sundays and those treated as such and

gc) weather changes, in industries or works that due to their nature are affected by weather conditions.».

3. Moreover, statutory working hours exceedance is governed by strict limits and formal requirements, since overtime hours **are not permitted to exceed four (4) and hundred and fifty (150) hours on a daily and yearly basis respectively.** Moreover, explicit provision is made for the **worker's right to refuse** to work overtime. More specifically, according to **article 194** of the Labour Code:

«1. *In enterprises that apply conventional working hours of up to 40 hours per week, the worker may be employed for five (5) additional hours per week, at the employer's discretion (overtime). These additional working hours of overtime (41st , 42nd , 43rd , 44th , 45th hour) are remunerated at a rate that equals the amount normally paid as hourly wage increased by twenty percent (20%) and are not included in the permissible overtime limits, according to the provisions in force. Workers employed on a six-day work week basis, (according to the previous section,) may work up to eight (8) hours per week overtime (from 41st to 48th hour).*

2. Work performed beyond 45 hours a week in the abovementioned enterprises under para. 1 is considered as statutory overtime and is governed by all legal consequences, formalities and authorization procedures. For workers employed on a six-day work week basis, work carried out beyond 48 hours a week is considered as statutory overtime. In any case, regulations on the statutory daily working hours still apply. ***Workers have the right to refuse the provision of statutory overtime work, as provided for by article 12****. Workers' refusal to provide additional work does not constitute grounds for termination of their contract of employment, nor may it lead to any detrimental change or discrimination against the worker by his employer.*

*3. Workers who are employed overtime, for every hour of legal overtime****, up to four (4) hours on a daily basis and until they complete hundred and fifty (150) hours on an annual basis,*** *are entitled to pay equal to paid hourly wage increased by forty percent (40%), without prejudice to the provisions in force on working hours and rest periods of workers, in particular articles 169 to 186.»*

4.Every hour of statutory overtime for which the formalities and authorization procedures provided by law are not respected, shall from now on be classified as illegal overtime.

5.For every hour of illegal overtime, the worker is entitled to receive compensation equal to paid hourly wage increased by hundred twenty percent (120%)».

6. By decisions of the competent body of the Ministry of Labour and Social Security, overtime work authorization for workers employed in all enterprises and works may be granted, as appropriate, in excess of the permitted annual maximum overtime limits under paragraph 3, in cases of urgency, when it is absolutely necessary to carry out the work which cannot be postponed. For the overtime work referred to above, workers are entitled to compensation equal to the paid hourly wage increased by sixty percent (60%).».

4. In any case, the following limits should be complied with, even when overtime hours are included:

- Weekly working hours **may not exceed forty-eight (48) hours on average, over a period of maximum four (4) months**. More specifically, pursuant to **article 174** of the Labour Code:
«Subject to the provisions of the legislation in force, the weekly working hours of workers may not exceed forty-eight (48) hours on average over a period of maximum four (4) months, including the hours of statutory overtime. The annual paid leave and sick leave periods shall not be considered when calculating the average".
- For every twenty-four (24) hours period**, minimum rest period may not be less than eleven (11) consecutive hours** (**article 171** of the Labour Code).
- Workers are guaranteed **a minimum rest period of twenty-four (24) consecutive hours per week** (**article 173** of the Labour Code).

5. Based on the above it follows that weekly working hours are forty (40) hours. **These forty (40) hours may be exceeded only for specific reasons and under strict formal requirements and clear limits, while even in these cases provision is made for the right of the employee to refuse the provision of overtime work**. Moreover, even in cases where the conditions are met for work exceeding forty hours in a workweek, weekly working time may not exceed forty-eight (48) hours over a reference period of four months, or thirteen (13) hours on daily basis and six (6) days on weekly basis.

6. Regarding work over sixty (60) hours on a weekly basis, according to data from the ERGANI Information System of the Ministry of Labour and Social Security, where all hours of work are registered, it follows clearly that such type of employment is very restricted in Greece. More specifically:
During the period 6/2025 till 9/2025 (period during which higher needs for additional work arise because of tourism):
- Within the said period, it has been noted that on average only **0.16% of workers** were employed over 60 hours on a weekly basis in high season.
- In off-season periods this percentage is significantly lower.

In practice, therefore, a very small percentage of workers have worked over sixty (60) hours, proving thus that such employment takes place in exceptional and urgent circumstances and conditions.
It is also important to mention that according to data of the ERGANI Information System, during the first month of implementation of Law 5239/2025, the percentage of employees who worked overtime over 3 hours on a daily basis rose just to 0,4% (Please note that the above mentioned percentage was noted during the festive period when there are increased labour market needs for overtime).

b) *Please provide information on the weekly working hours of seafarers.*
Regarding seafarers, the maximum permissible weekly working hours are set by the Maritime Labour Convention, 2006 of the International Labour Organisation which was ratified by virtue of Law 4078/2012 (G.G. A΄ 179) and is implemented by virtue of the

Regulation on the application of its requirements (Ministerial Decision No. 3522/08/2013 (G.G. B΄ 1671).

In addition to the above, the Regulation on maximum working time of crew members in passenger, vehicle/passenger, high-speed vessels shall apply [P.D. 381/2001 (G.G. A΄ 252)][1].

According to the current framework, the limits of hours of work/rest for seafarers who are employed in vessels other than the above mentioned (i.e. passenger, vehicle/passenger, high-speed vessels)**,** must be the following, according to the MLC 2006 of the International Labour Organisation:

(a) maximum hours of work which may not be more than:

(aa) 14 hours in any 24-hour period and

(bb) 72 hours in any seven-day period

(b) minimum total hours of rest which may not be less than:

(aa) ten hours in any 24-hour period and

(bb) 77 hours in any seven-day period

It must be noted that Greece has chosen to apply the *minimum hours of rest* format in accordance with the Regulation on the application of MLC, 2006[2].

Especially for seafarers employed on passenger and passenger-vehicle and high-speed vessels:

- The daily working time shall be 8 hours, which cannot be extended beyond two (2) hours per 24-hour period.
- In exceptional cases, and under specific conditions, daily employment of up to one (1) additional hour is possible, i.e. up to eleven (11) hours per day.
- In a 7-day period, working hours may not exceed seventy (70) hours.

The standard working hours for seafarers are generally based on an eight-hour working day with one day off per week and rest on public holidays.

Working time for seafarers means the time during which the seafarer is required to work on the vessel, including the time required to work before departure and after arrival, respectively at the beginning of the itinerary/voyage, on arrival at intermediate ports and after the end of the itinerary/voyage, on condition that this is provided for in their duties and the specific conditions of each vessel. This time may be determined within the framework of a system applied for the performance of work on vessels, in particular in accordance with the relevant service regulations, the collective maritime labour agreement applicable to the relevant ship category, and the orders of the captain who is responsible for regulating and supervising the work of the crew in order to achieve the vessel's safe and regular operation.

As regards maritime labour, it should be noted that labour legislation does not apply to maritime employment, which is governed by the Private Maritime Law Code (Law 3816/1958), the Public Maritime Law Code (Legislative Decree 187/1973) and other specific laws governing collective maritime labour agreements (Law 299/36, Emergency Law 3276/45, Legislative Decree 304/74). Normally, maritime work, in terms of working

[1] The said P.D. was adopted following previous consultation with the social partners, before the MLC, 2006 in exercise of the powers conferred by the SOLAS Convention (Law 1045/1980).

[2] Article 8 of Ministerial Decision No 3522/08/2013) (G.G. B΄ 1671).

conditions, time limits, and seafarers' pay, is the responsibility of the Port Authority, which is the body responsible for inspecting the vessel. The provisions of labour legislation and the relevant articles of the Civil Code may only be applied on a supplementary basis, provided that this does not contravene the specific nature of maritime work. It follows from the above that the inspection of vessels and their crew falls outside the remit of the Labour Inspectorate. Practical implementation is monitored through regular and extraordinary inspections carried out by the competent local Port Authorities.

c) *Please provide information on how inactive on-call periods are treated in terms of work or rest time.*

As mentioned in the previous Greek report on Article 2(1) of the ESC, based on both theory and case-law and on the interpretation of articles 648-652, 657-663, 666-667, 660 and 671 of the Civil Code, in combination with the provisions of Law 3239/55, 1876/90 and of the Legislative Decree 3755/57, it follows that generally an employment relationship involves the active or positive provision of intellectual or physical activity for the achievement of a certain economic result by the worker.

However, provision of dependent work exists even when the worker's freedom is restricted being obliged to remain at a place and time set by the employer, in order to be ready for the performance of duty, if the circumstances necessitate it[3]. In this case we have a readiness to perform duty relationship. The form and type of these agreements are not provided for by any provision of law, CLA, regulation, etc., but theory and case-law have accepted that such an employment contract under Articles 648 et seq. of the Civil Code is entirely valid, in accordance with the provision of Article 361 of the Civil Code on freedom of contracts, since such an agreement is not prohibited by any other provision of substantive or formal law.

An employee's readiness to perform duty is divided into the following two main categories, depending on the intensity of his alertness: a) actual readiness to perform duty or standby duty and b) mere readiness to perform duty or on-call duty (on call). When actually ready or standby, the employee must maintain his mental and physical alertness and remain either at the company premises or at another specific location and, when required, be able to go to the workplace and make himself available to the employer during specified hours as appropriate. This form of readiness is considered to be full-time employment, irrespective of work occurrence and thus, such form of readiness is fully equal to normal work, since apart from the restriction of one's freedom in favour of another person, full physical and mental alertness of the worker is also required. Thus, when an employee is on standby duty, all labour law provisions apply[4].

[3] First Instance Court Decision 70/2010, Plenary Session, First Instance Court Decision 10/2009, Athens Single-Member Court of First Instance 362/2008, Athens Court of Appeal 6002/2004.

[4] First Instance Court Decision 766/2012, First Instance Court Decision 1352/2009, First Instance Court Decision 115/2009, First Instance Court Decision 112/2009, First Instance Court Decision 1512/2008, Court of Appeal of Thessaloniki 830/1995, First Instance Court Decision 1234/1990, First Instance Court Decision. 157/1989, First Instance Court Decision 66/1989, First Instance Court Decision 1418/1984.

When merely ready or on-call the employee, on agreement with the employer, is required to restrict his freedom in favour of the latter, by remaining at a specific place and time, without being obliged to maintain his mental and physical alertness in order to make himself available to the employer at any time. In the case of simple readiness for work, there is an employment relationship, but case law accepts that not all provisions of labour law apply, unless otherwise agreed, except in cases where there is actual work or where special circumstances require the employee to be on alert[5].

The provisions of law or of CLAs setting out pay thresholds do not apply, nor the provisions on pay increments for night work or work on Sundays and holidays, or those on working time limits relating to additional pay for overtime, statutory overtime etc. However, salary should be paid and if the salary amount is not agreed upon, it shall be defined, pursuant to article 653 of the Civil Code (salary that normally applies) depending on the duration of the worker's commitment, etc.[6]. If therefore, there is no agreement on the salary amount, the employer must pay the «salary that normally applies», i.e., the one that is paid by all employers for the provision of similar work or services to other workers of the same age who provide the same type of services at the same place and time and under the same conditions.

Furthermore, according to Article 581 para 1 of the Labour Code (PD 62/2025, GG A' 121), as amended and in force:

"1. The employer is required to register any change or modification to the working hours or organization of working time, as well as the legal overtime work of employees, in the ERGANI Information System no later than the day of the change or modification of the working hours or the organization of working time and, in any case, before the employees take up their duties and before the start of overtime work. When the competent supervisory bodies find that there has been a change or modification in working hours or in the organization of working time or overtime work without this having been reported prior to its commencement, sanctions shall be imposed on the employer by an act of the competent body, in accordance with Articles 572 and 576 ».

Consequently, even in cases where actual work is performed during mere readiness, any change or modification to the working hours or organization of working time of employees is legitimate only if it is registered in the ERGANI Information System no later than the same day of the change and in any case before the employees take up their duties.

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[5] First Instance Court Decision 70/2010, Plenary Session First Instance Court Decision 10/2009, First Instance Court Decision 207/2009, Court of Appeal of Ioannina 103/2008, First Instance Court Decision 802/2003, First Instance Court Decision 962/2007, First Instance Court Decision 1659/1995, First Instance Court Decision 1208/1995, Court of Appeal of Thessaloniki 830/1995, Court of Appeal of Thessaloniki 2580/1995, First Instance Court Decision 1184/1993, First Instance Court Decision 1234/1990, Court of Appeal of Thessaloniki 2043/1990, First Instance Court Decision 66/1989, First Instance Court Decision 1406/1988, First Instance Court Decision 1511/1987, Athens Single-Member Court of First Instance 4334/1985, First Instance Court Decision 1127/1984, Court of Appeal of Piraeus 139/1984.

[6] First Instance Court Decision 70/2010, Plenary Session, First Instance Court Decision 10/2009, First Instance Court Decision 207/2009, First Instance Court Decision 1749/2008, Court of Appeal of Ioannina 103/2008, First Instance Court Decision 802/2003, First Instance Court Decision 1659/1995, First Instance Court Decision 1208/1995, First Instance Court Decision 1184/1993, First Instance Court Decision 1234/1990.

It should also be noted that for each twenty-four (24) hour period, which begins at 00:01 and ends at 24:00, a minimum daily rest period of eleven (11) consecutive hours must be ensured for the employee. Deviations from the above minimum daily rest period are permitted, pursuant to Article 182 para1 of the Labour Code, by collective labour agreements between the most representative employers' organizations and employees' trade unions at national, sectoral, or regional level, in accordance with the rules laid down by them, provided that the employees concerned are granted equivalent periods of compensatory rest. Or, in exceptional cases where it is objectively impossible to grant equivalent periods of compensatory rest, appropriate protection is provided to those workers in accordance with the assessment of occupational risk as provided for in Article 498. Therefore, after the end of the daily work, it is possible to resume work, without prejudice to compliance with the minimum daily rest period of 11 hours, while a derogation from this rest period is only possible if the procedure laid down in paragraph 1 of Article 182 of the Labour Code.

Finally, it must be noted that in order to bring our national law in line with the requirements of EU Directive 2019/1152 of the European Parliament and of the Council of 20 June 2019, article 4 of Law 5239/2025 (A 178) **amended** article 73 of the Labour Code (P.D. 62/2025) (transposing article 4 of Directive 2019/1152) and article 190 of the Labour Code (transposing articles 10 and 11 of Directive 2019/1152) and thus on-demand contracts, i.e. contracts without agreed upon hours of work, were abolished.

Article 3- The right to safe and healthy working conditions

Article 3§1 - The right to safe and healthy working conditions

Please provide information on the content and implementation of national policies on psychosocial or new and emerging risks, including:
• in the gig or platform economy;
• as regards telework;
• in jobs requiring intense attention or high performance;
• in jobs related to stress or traumatic situations at work;
• in jobs affected by climate change risks.

Law 3850/10 (GG 84 A') "Ratification of the Code of Laws on the Health and Safety of Workers" (KNYAE) (as codified by Presidential Decree 62/2025 "Labour Law Code") applies to protect the health and safety of workers from all occupational risks including psychosocial ones. The provisions of the code apply (unless otherwise specified) to all enterprises, undertakings and premises in the public and private sector and to every worker employed by an employer under any employment relationship (including temporary employees and employees under fixed-term contracts) trainees and apprentices. According to the above provisions of the KNYAE, the employer is obliged to ensure the health and safety of employees in all aspects of work and to take measures to ensure the health and safety of third parties (principle of employer responsibility) (Article 533 of Presidential Decree 62/2025).
The provisions of the KNYAE do not apply to domestic staff, but the health and safety of such staff must be ensured within the scope of this law.

Law 4808/21 "On the Protection of Labour" (Government Gazette 101 A), which ratified Convention 190 of the International Labour Organization "On the elimination of violence and harassment in the world of work" (Part I), introduced in Part II, as codified in Articles 58-69 of Presidential Decree 62/2025 - Chapter B, Section II "Measures and regulations against violence and harassment at work", amendments to individual articles of the KNYAE (Articles 491-545 of Presidential Decree 62/2025) with the explicit inclusion of psychosocial risks, and in particular the risks of violence and harassment (including sexual harassment), occupational risks and the general obligation of the employer to assess these risks and take them into account when planning actions to prevent and improve working conditions (amendment to paragraph i, Article 42 "General obligations of employers" of Law 3850/10 as codified by Article 533, paragraph i).

Furthermore, according to the amendment of the same article (Article 42, paragraph e), when drawing up the preventive action program, the employer must take into account - apart from psychosocial risks - parameters such as work organization, social relations, and environmental and technological factors.
Specifically:
- Provisions have been included regarding the employer's obligation to inform employees about the risks to their health and safety and the relevant prevention and

protection measures and activities concerning either the company in general or any type of work and tasks, and to eliminate these risks, including risks of violence and harassment (including sexual harassment) (“Information in the context of health and safety” - Amendment of Article 47 of Law 3850/10 as codified by Article 537 of Presidential Decree 62/2025).

- With the amendment of Articles 17 and 18 of Law 3850/2010 "Strengthening the powers of labour physicians – as codified by articles 507 and 508 of Presidential Decree 62/2025 - expanded the advisory powers of labour physicians both in matters of prevention of violence and harassment at work and in matters of integration or reintegration into the productive process with the necessary adjustments to the workplace, for individuals who have suffered discrimination or are victims of violence and harassment or victims of domestic violence (Article 507 of Presidential Decree 62/2025). In addition, labour physicians, as part of their role in monitoring the health of employees, provide information on the risks of violence and harassment and ways to prevent them, and provide emergency treatment, among other things, in cases of violence (Article 508 of Presidential Decree 62/2025).
- By amending Article 62 of Presidential Decree 62/2025 "Labour Code" by virtue of Article 3 *"Company policies for combating violence and harassment and for handling internal complaints - Amendment to Article 62 of the Labour Code"* of Law 5239/2025 "Fair Work for All: Simplification of Legislation - Support for the worker - Protection in Practice - Pension Arrangements and Other Provisions" (A' 178), additional obligations were established for employers with more than 20 employees to develop policies for the prevention and fight against violence and harassment, stating zero tolerance for such forms of behavior and the rights and obligations of employees and employers for the prevention and handling of such incidents or forms of behavior shall be specified, and the procedure for handling internal complaints in a confidential manner and with respect for human dignity shall be described. This policy is drawn up in consultation with employees or their representatives. If the enterprise/employer is required to draw up Staff Regulations or if it has or is drawing up such regulations, the text of the policy referred to in Article 62 of Presidential Decree 62/2025 shall be included in it.

Details regarding the minimum content of the policy, as defined in Article 62 of the Labour Law Code, and a relevant policy template are provided in **Ministerial Decision 95/08-01-2026** "Policy templates for combating violence and harassment and for handling internal complaints of article 62 of the Labour Law Code which abolished Ministerial Decision 82063/2021 (B’ 5059) “Policy templates for combating violence and harassment and for handling internal complaints under Articles 9 and 10 of Law 4808/2021, as well as relevant instructions to those responsible, pursuant to paragraph 1 of Article 22 of Law 4808/2021 (A' 101)".
(Ministerial Decision 82063/21 was repealed by Ministerial Decision 95/2026 due to the amendment to Article 62 of Presidential Decree 62/2025 "Labour Code" (A' 121) introduced by Article 3 "Company policies for combating violence and harassment and for handling internal complaints - Amendment to Article 62 of the Labour Code" of Law 5239/2025 "Fair

Work for All: Simplification of Legislation - Support for the worker - Protection in Practice - Pension Arrangements and Other Provisions" (A' 178). This repeal will not substantially change the content of the Ministerial Decision).

Article 3, "Policy Content" of MD 95/2026, regarding the Assessment of risks of violence and harassment at work, states that risks at least associated with violence and harassment are identified in the policy, taking into account any inherent risks arising from the nature of the activity, the job position, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks relating to specific groups of employees.

Paragraph b of Article 3 lists indicative measures for the prevention and handling of violence and harassment at work, and paragraph 1c provides information on the obligation to inform and raise awareness among staff about the risks of violence and harassment and the relevant measures for prevention and protection against these risks.

Article 4 of the Ministerial Decision stipulates the employer's obligation to prominently post this policy in the workplace, on the company's website (if available), and to communicate it to employees and their representatives, in hard copy or electronically.

Furthermore, Law 5239/2025 "Fair Work for All: Simplification of Legislation - Support for Employees - Protection in Practice - Pension Arrangements and Other Provisions" (A' 178), in Part B, "Provisions for Health and Safety at Work" in Article 37, which amended Article 533 of Presidential Decree 62/2025 (codification of Article 42 "General obligations of employers" of Law 3850/2010), included a specific reference to workers with disabilities and chronic illnesses and, when designing measures to prevent and improve working conditions, (paragraph 6(e)) and in terms of ensuring their unhindered participation in training/education (paragraph 6(g)), their coverage by collective protection measures (paragraph 6(h)) but also in the implementation of health and safety measures by providing instructions that are understandable to persons with disabilities (paragraph 7i), and in providing reasonable adjustments for the performance of the tasks assigned to them (paragraph 8b).

Furthermore, in paragraph 8a of the same article, other factors were added that employers should take into account during the risk assessment process, specifically: risks related to the production process arising from the configuration of the working method, working patterns, working time, and their interaction, as well as from inadequate information at work.

Regulations for temporary employees

Pursuant to Articles 113–133 of Law 4052/2012 (Government Gazette 41A), as currently in force, Directive 2008/104/EC of the European Parliament and of the Council of 19 November 2008 on work through Temporary Employment Agency was transposed into our national law.

Article 125 includes the relevant health and safety provisions for temporary workers. In particular, paragraph 1 of Article 125, "Health and safety at work for temporary workers," states that "Employees under a temporary employment contract or relationship enjoy the same level of protection in terms of safety and health at work as that provided to other

employees of the indirect employer. The indirect employer, notwithstanding any contractual provision for joint responsibility with the Temporary Employment Agency, is responsible for the conditions under which the employee performs his work and for any accident at work. Furthermore, paragraph 2(a) states that the **Temporary Employment Agency is required to have a Safety Technician and a Labour Physician** regardless of the number of employees, while paragraph 2(h) states that the Temporary Employment Agency and the indirect employer must cooperate systematically in order to ensure the health and safety of temporary workers.

In order to ensure that temporary workers have the necessary qualifications and skills for the job to be performed for the indirect employer, Article 124(3) of the same law states that "... *The indirect employer must specify, before the employee is made available under the contract, the professional qualifications or skills required, the special medical monitoring and the specific characteristics of the job post to be filled. The employer must also point out any major or specific risks associated with the specific job. The Temporary Employment Agency is required to communicate this information to employees"*.

Specifically, in case of violence and harassment of staff through third-party providers, Article 59 "Scope of Application", paragraph 1 of Presidential Decree 62/2025 states that measures and regulations concerning harassment and violence at work apply - among others, to employees and workers in the private sector - regardless of their contract status, including those employed through third-party service providers. More specifically, Article 1, "Protected persons - Obligated companies," paragraph 3, of Ministerial Decision 95/2026 "Policy templates for combating violence and harassment and for managing internal complaints under Article 62 of the Labour Law Code", regulates the specific issue of the rights and obligations of employees working through third parties. The said article provides that these employees are covered by the protection granted by the indirect employer to its employees, but also by the obligations the employer has to take measures in case of violation by a temporary employee in his company, under Article 460 "Prohibition of violence and harassment at work" of the "Labour Law Code" provided that the managerial right is exercised by the indirect employer. Nevertheless, the exercise of disciplinary authority remains with the direct employer and is governed by its own framework.

Provisions for employees working remotely

Article 130 "Terms of Teleworking" of Presidential Decree 62/2025 regulates issues relating to the provision of remote work.

Specifically, paragraph 7 states that teleworkers have the same rights and obligations as employees working at the premises of the company or business "in relation to workload, assessment criteria and procedures, rewards, access to information concerning the company, training, and professional development..." Furthermore, paragraph 8 states that the employer should monitor the employee's performance in a manner that respects their private life, whereas the use of a webcam for this purpose is prohibited.

According to para 9, the employer shall provide information to the teleworker about the company's health and safety policy, and particularly the specifications of the teleworking space, the rules for the use of visual display screens, breaks, the organizational

and technical means of paragraph 10, which define the right to disconnect, and any other necessary information. The teleworker must comply with health and safety legislation and not exceed working hours. Furthermore, when providing telework, it is assumed that the telework space meets the above specifications and that the employee complies with health and safety rules.

Specifically, regarding the right to disconnect under paragraph 10 of Article 130 of Presidential Decree 62/2025: employees have the right to abstain completely from providing their services, to avoid digital communication, and answering phone calls, emails, or any other form of communication beyond working hours and during their statutory leave. Any adverse discrimination due to the exercise of the right to disconnect is prohibited.

To assess the occupational risks of teleworkers, the European Agency's website provides a corresponding online tool, OiRA, in Greek, which includes control categories for this activity and is aimed both at employers - for the measures they need to take for the health and safety of teleworkers - and at employees, so that the latter can assess the conditions of their teleworking space and become aware of the risks.

Furthermore, for private sector employees who are at a proven risk to their health, the provisions of Article 130 para.3(b) of Presidential Decree 62/2025 apply, whereby they are required to work remotely, at their request, for as long as the risk persists. By virtue of authorization, No. 105583/9-11-2022 decision "*Application of the provisions of paragraph (b) of Article 5(3) of Law 3846/2010 (GG A' 66) was issued, as replaced by Article 67 of Law 4808/2021 (GG A'101) on "provision of remote work through teleworking at the request of the employee*," which specifies the conditions, illnesses, or disabilities that can substantiate a serious risk to their health, as well as the supporting documents that the employee must submit, the competent bodies, and the procedure for proving this risk.

Provisions for employees working on digital platforms

Article 134, "Health and Safety of Service Providers," of Presidential Decree 62/2025 includes provisions for the Health and Safety of service providers with reference in paragraph 1 that digital platforms have towards natural persons connected by independent service or project contracts the same welfare, health, and safety obligations under the relevant legislation, applied mutatis mutandis, as they would have towards those persons if they were bound by employment contracts. As stated in Article 135 "Obligation to inform service providers of their rights" of Presidential Decree 62/2025, the obligations of the digital platform regarding the health and safety of providers as specified in the legislation form part of the independent service or project contract between them, a copy of which is provided to these workers. The agreement also contains measures for the protection of personal data of service providers that should be taken by the digital platform.

Employees involved in the distribution of products and items by means of mopeds or motorcycles who are employed on a dependent basis or through a digital platform are protected by specific measures set out in Ministerial Decision 72555/23 (B' 4958) "Safety and Health during the distribution and transport of products and items by mopeds or motorcycles." These measures concern the certificates and other required documents that

the employer must have for the proper use and maintenance of vehicles, the types and specifications of personal protective equipment, and the occupational risk assessment standard for these activities.

The risk assessment standard provided in the Annex to the Ministerial Decision includes checkpoints based on the provisions of the Ministerial Decision, such as: general issues of occupational health and safety (services of a Safety Technician, Labour Physician, employee training), specific issues relating to the use of these means (specifications for two-wheeled vehicles and transport equipment, personal protective equipment), protection from natural factors (extreme temperatures - heat waves, extreme cold, solar radiation, noise, vibrations) as well as checkpoints for organizational and psychosocial factors (high workload and time pressure, irregular breaks, working hours, unsafe work, violence and harassment). The above ministerial decision takes care of these workers in terms of exposure to extreme temperatures, with the provision of Article 7 "Other provisions," which states that in the event of extreme weather conditions (heatwave - extreme cold), the employer is obliged to implement specific measures and circular guidelines.

Provisions for protection against environmental risks

The Ministry of Labour and Social Security issues circular guidelines for employers to take specific organizational and technical measures, including breaks and work cessation for the protection of employees working outdoors (construction work, distribution services, technical works, etc.) from heat stress.

Organizational measures include performing outdoor work during hours when temperatures are not at their peak, scheduling adequate breaks to reduce heat stress, the provision of canteens or other suitable break areas, with air conditioning where possible, the reduction of employment or work cessation in particularly hot areas, such as engine rooms, foundries, glassworks, pottery works, shipbuilding, etc., between 12:00 and 16:00.

Other measures relate to providing guidance to workers, giving them the appropriate personal protective equipment, protecting workers belonging to high-risk groups, dealing with emergencies and providing first aid, providing specific measures for work carried out exclusively outdoors, etc.

In any case, the temperature in the workplace must be appropriate to the needs of the human body, considering the nature of the work, the physical effort required to perform it, and the weather conditions throughout the year.

In addition, beyond the above organizational and technical measures included in general circulars (currently in force: Circular 34666/03-6-2024 on "Prevention of heat stress among workers" (ΑΔΑ: ΡΓ1Ν46ΝΛΔΓ-ΩΟ6) applicable to both the private and public sector), in cases where, according to data from the National Meteorological Service, particularly high temperatures and discomfort levels (WBGT) are expected to prevail, the Ministry issues ad hoc circulars applicable to private sector workers and specific areas of the country, imposing a mandatory stoppage of manual work performed outdoors (e.g., construction and technical works, delivery services etc.) during peak hours (usually 12:00-

17:00). Indicative examples include circulars nos. 19938/20.07.2025, 20041/21.07.2025, and 20165/22.07.2025.

It should be noted that the measure of mandatory work stoppage to protect workers from heat stress was first implemented in our country in 2023, during the heatwave known as "CLEON", when Ministerial Decision 65581/2023 (Government Gazette 4491/B` 12.7.2023) was issued *"Emergency measures to address heat stress among private sector workers during the heatwave known as 'CLEON'."*

Furthermore, Article 521 of the Labour Code Law concerning the protection of workers in cases of natural and technological disasters and extreme weather phenomena, for which emergency measures are taken by the competent authorities, in particular measures relating to the compulsory evacuation or preventive removal of citizens from specific areas, employers of companies operating in these areas are required to comply with such measures.

Regulations for self-employed persons

Presidential Decree 305/1996 "*Minimum safety and health requirements to be applied to temporary or mobile construction sites in accordance with Directive 92/57/EEC*" stipulates in **Article 9**:

"2. *In addition, self-employed persons have, correspondingly:*
a. All the obligations for employers when they share the same workplace in accordance with Article 7 (paragraph 9) of Presidential Decree 17/96.
b. The general obligations of Article 8 (paragraphs 1 and 2, subparagraph a) of this decree.
c. The obligation to apply Annex IV of Article 12 of this decree."

Article 3(6) of Presidential Decree 212/2006 "*Protection of workers exposed to asbestos at work, in accordance with Council Directive 83/477/EEC, as amended by Council Directive 91/382/EEC and Directive 2003/18/EC of the European Parliament and of the Council*" states that: "**Self-employed persons** have all the obligations of employers and employees with regard to safety and health protection for technical work."

On the same subject, the circular implementing Presidential Decree 212/2006, No. 130115/06.07.2007, in the context of establishing a chain of responsibility and awareness among all those involved in asbestos management projects, provides for clear obligations for self-employed persons, as well as for contractors and subcontractors, when they themselves carry out professional activities on the construction site (Article 3 - section "*Coordination of employers - joint responsibility of employers*").

In addition to the above legislative provisions, any circular of an informative or interpretative nature containing technical and organizational measures (e.g., circulars on thermal stress) is also communicated to bodies such as the Hellenic Confederation of Professionals, Craftsmen, and Merchants (GSEVEE), whose members include many categories of self-employed persons. These measures do not exclude self-employed persons. In addition, it should be noted that these bodies are also represented on the Council for Health and Safety of Workers (SYAE), which gives its opinion on every regulatory act that is brought forward.

Article 3§2 – Health and Safety Regulations

a) *Please provide information on:*

• the measures taken to ensure that employers put in place arrangements to limit or discourage work outside normal working hours (including the right to disconnect);

As regards the right to disconnect, this is mandatory under the law and must be specified in the employer's relevant teleworking policy. (see above under Article 3 para.1 of the Revised ESC in the sub-section entitled "*Provisions for Teleworkers").*

• how the right not to be penalised or discriminated against for refusing to undertake work outside normal working hours is ensured.

b) *Please provide information on:*

• the measures taken to ensure that self-employed workers, teleworkers and domestic workers are protected by occupational health and safety regulations;

• whether temporary workers, interim workers and workers on fixed-term contracts enjoy the same standard of protection under health and safety regulations as workers on contracts with indefinite duration.

As mentioned above in Article 3(1) of the Revised ESC for the protection of the health and safety of workers against all risks arising from work, including psychosocial risks, Law 3850/10 (GG 84 A') "Ratification of the Code of Laws on the Health and Safety of Workers" [KNYAE] applies. The provisions of the code apply (unless otherwise specified) to all public and private sector companies, undertakings and premises and apply to every worker employed by an employer under any employment relationship (including temporary employees and employees under fixed-term contracts), trainees, and apprentices. According to the above provisions of the KNYAE, the employer is obliged to ensure the health and safety of employees in all aspects of work and to take measures to ensure the health and safety of third parties (principle of employer responsibility) (Article 42, paragraph 1).

The provisions of the KNYAE do not apply to domestic personnel, but the health and safety of such personnel must be ensured within the scope of this law.

With regard to teleworkers, see above under Article 3(1) of the Revised ESC, in the sub-section entitled "Provisions for teleworkers", which provides a detailed analysis of the coverage of teleworkers by OSH legislation.

Furthermore, Article 7 of Law 5239/2025 stipulates that employees have the right to refuse to work overtime. The employees' refusal to work overtime does not constitute grounds for termination of their employment contract, nor can it lead to any detrimental change or unfavorable discrimination against them by the employer.

Article 3§3 - Enforcement of health and safety health regulations

Please provide information on measures taken to ensure the supervision of implementation of health and safety regulations concerning vulnerable categories of workers such as:

- *domestic workers;*
- *digital platform workers;*
- *teleworkers;*
- *posted workers;*
- *workers employed through subcontracting;*
- *the self employed;*
- *workers exposed to environmental-related risks such as climate change and pollution.*

In recent years, the Occupational Safety and Health Inspectorate (AYE) has carried out two campaigns targeted at enterprises employing motorcycle couriers (1,344 inspections in 2022 and 661 in 2024), many of whom work on digital platforms.

In recent years, particular emphasis has been given to inspections of construction and technical projects (5,032 inspections in 2023, 5,942 in 2024), in which a significant number of self-employed persons work.

Furthermore, every year during the summer period, the OSH Inspectorate carries out a special program of preventive inspections to monitor the adoption and respect of appropriate organizational and technical measures by enterprises to reduce heat stress on workers. The program is implemented in accordance with relevant circulars issued by the Ministry of Labour and Social Security and intensifies inspections to ensure the implementation of measures to reduce heat stress on workers, with an emphasis given to sectors where, on the one hand, the working environment is extremely hot and, on the other hand, there is direct exposure to solar radiation, such as outdoor work. Specifically, 1,615 inspections were conducted in 2023 and 1,030 in 2024.

Inspections carried out in all sectors of economic activity to ensure compliance with occupational health and safety measures concern all employees, including those employed on a subcontracting basis and posted workers.

Article 4 – The right to fair remuneration

Article 4§3 – Right of men and women to equal pay for work of equal value

a) *Please indicate whether the notion of equal work and work of equal value is defined in domestic law or case law.*

The concepts of «equal work» and «work of equal value» are provided in Greek Law (article 22 para. 1 of the Constitution, article 37 of the Labour Code), however, they are not accompanied by an explicit, single and precise legislative definition or by standard assessment criteria for the value of work.

So far, interpretation and application of the said concepts have mainly been made through case law of both national courts and of the EU Court of Justice.

In the context of the ongoing **EU Directive 2023/970** transposition process, the systematic regulatory precise definition of the above-mentioned concepts is under consideration, in accordance with the requirements of the Directive, based on objective and gender-neutral criteria.

The final form and scope of the said precise definition shall be determined upon completion of the Directive transposition process into our national law.

b) *Please provide information on the job classification and remuneration systems that reflect the equal pay principle, including in the private sector.*

Existent pay structures and job evaluation/classification systems in Greece do not adequately reflect the concepts of *equal work* or *work of equal value* and therefore do not permit meaningful comparisons across different jobs, nor are they built on *gender-neutral evaluation criteria*. In the context of the transposition and implementation of Directive (EU) 2023/970 into national law, the competent ministries will make available to employers and social partners—through a digital database—the evaluation tools and methodologies developed by national, European and international organizations. This will enable the adoption and use of gender-neutral job evaluation and classification systems. To this end, the **European Institute's for Gender Equality** (EIGE) step-by-step toolkit for gender-neutral job evaluation will be utilized.

In addition, within the framework of the *FAIR PAY [Pioneering Equal and Transparent Pay Initiatives Project (2025-2026)*] *project,* the development of a practical Guide, detailed tools and checklists for assessing and comparing equal pay for equal work or work of equal value is foreseen, including the application of gender-neutral job evaluation and classification systems, for use by private sector employers and social partners in collective bargaining. The project also provides for the design and delivery of training programmes to strengthen the capacity of employers and social partners in assessing equal pay for equal work or work of equal value and in applying gender-neutral evaluation and classification systems.

In the **Greek Public Sector**, the concept of "work of equal value" is practically implemented through job descriptions that define duties, responsibilities, and working

conditions, allowing for comparative evaluation of positions and the application of the principle of work of equal value.

Article 22(1)(b) of the Greek Constitution guarantees the principle of equal pay for work of equal value. The legislation for wages in the public sector (e.g. **Law 4354/2015** [O.G. A΄176/16.12.2015] on **"** *Management of non-performing loans, wage regulations, and other urgent provisions for the implementation of the agreement on fiscal targets and structural reforms"*, **Law 4472/2017** [O.G. A΄74/19.05.2017] on "*Pension provisions for the public sector and amendment of provisions of Law 4387/2016, measures for the implementation of fiscal targets and reforms, social support measures and labor regulations, the Medium-Term Fiscal Strategy Framework 2018–2021, and other provisions",* etc.) does not imply gender discrimination. In the Public sector a standardized pay structure is in place, ensuring that all employees regardless of gender are paid based on qualifications (education category) and experience (years of service).

More specifically, **Law 4354/2015** introduced the unified pay scale (single salary system) for the public sector, classifying employees by educational category (University Educational category, Technological Educational Category, Secondary Educational Category and Compulsory Educational category).

In addition to basic salary employees may receive additional allowances according to specific criteria, such as job position (level of responsibility), family status, working conditions (hazardous duties) and location (working in border regions).

A respective logic is applicable also in the case of persons working in the public sector whose remuneration falls under a special wage grid (indicatively members of armed forces, police, personnel working in the fire service, judges, doctors) that is based on the rank of grade they hold.

Therefore, the above legislative framework is based on common gender-neutral criteria and excludes discrimination based on gender. The entire salary framework is established by legislative provisions that apply objective and impartial criteria with respect to gender.

Moreover, regarding the prioritization of positions in the public sector, we would like to inform you of the following:

According to article 76 of the Civil Servants' Code (Law 3528/2007), «Posts falling under the provisions of the present law are classified in the following categories: a) Specific Posts (EO), b) posts for holders of University Education degree (PE), c) posts for holders of Technological Education degree (TE), d) posts for holders of Secondary Education degree (DE), e) posts for holders of Compulsory Education degree (ΥΕ)». It must be noted that the said classification of jobs is used also in the provisions of Law 4354/2015, that specifies issues relating to civil servants' pay that fall under the scope of the Civil Servants' Code. Article 77 of the Civil Servants' Code, which applies in combination with P.D 85/2022 on Qualifications for appointment, specifies the requested formal qualifications by post category.

It must be clarified that article 8 of Law 4354/2015 provides for the decoupling of the grade under which the civil servant is classified from the salary he receives and therefore

there is no connection any more between pay-scale and grading systems. The above-mentioned information applies also to the personnel bound by open-ended private law employment relationship, which according to article 28, para.3 of Law 4369/2016 was included in the same grading system as the permanent staff.

c) *Please provide information on existing measures to bring about measurable progress in reducing the gender pay gap within a reasonable time. Please provide statistical trends on the gender pay gap.*

Measures to close the gender pay gap

- As mentioned above, Greece is in the process of *transposing Directive (EU) 2023/970* on pay transparency, through the *adoption of a law*. A *working group*, consisting of experts and representatives from the ministries and agencies involved, has been formed and is currently operating in order to draw up conclusions and draft law. The group's work is due to be concluded in February 2026.
- The *FAIR PAY- Pioneering Equal and Transparent Pay Initiatives Project (2025-2026)* funded under the EU Citizenship, Equality, Rights and Values (CERV) programme, supports the implementation of the Pay Transparency Directive. Coordinated by the General Secretariat for Gender Equality and Human Rights in partnership with the Research Centre for Gender Equality, the Greek Association of Women Entrepreneurs, and NGO Women on Top (now renamed WHEN), the project introduces concrete measures to promote equal pay for equal work or work of equal value.

Its main objectives are to promote pay transparency, develop practical tools for gender-neutral job evaluation, strengthen the capacity of employers and workers, and raise awareness of the benefits of equal pay, whereas their actions include the documentation of good practices, stakeholder consultations, the creation of practical tools and a training manual, educational seminars for employers and employees, awareness-raising campaigns, and the establishment of an online platform. A final conference will ensure broad dissemination of results.

By combining research, training, consultation, and awareness activities, *FAIR PAY* provides a structured pathway for measurable progress in narrowing the gender pay gap in Greece in line with EU requirements.

- In 2020, the General Secretariat, in cooperation with the Research Centre for Gender Equality (KETHI) and the NGO Women on Top, implemented the pilot project *SHARE – Promoting work-life balance in companies and a better sharing of care between men and women*, co-funded by the European Commission's Rights, Equality and Citizenship (REC) Programme. Within this framework, a pilot "Equality Label" was awarded to enterprises applying gender equality policies. A specific methodology was developed, requiring participating companies to prepare and implement an Equality Plan. Among the core assessment criteria was equal pay for work of equal value. Twenty-two enterprises applied, and eighteen were awarded the pilot "Equality Label."

Building on the knowledge and experience gained through SHARE, Greece established a permanent and comprehensive scheme for awarding the *Equality Label* to enterprises in both the public and private sectors, as provided by Law 4604/2019 (as amended by Law

4808/2021). The full implementation of the Equality Label has been integrated into the PA 2021–2027 under the "Human Resources and Social Cohesion" sectoral program. The project establishes a structured, sustainable mechanism for promoting gender equality in enterprises which includes the creation of an information system for monitoring the Label, advisory support for GSEHR, and updated training material (including e-learning). The Equality Label rewards companies that implement policies on equal treatment, equal opportunities for women and men, and the prevention of violence and harassment at work. Importantly, the elimination of pay disparities and the promotion of equal pay for work of equal value are included among the criteria for awarding the Label, thus rendering the Equality Label a policy that contributes directly to measurable progress in narrowing the gender pay gap by embedding equal pay principles into company policies and practices.

- Greece adopted Law 5178/2025 on gender-balanced representation in senior management positions of listed companies, non-listed public limited companies, and state-owned enterprises. The law transposes Directive (EU) 2022/2381 into national law and raises the quota for the underrepresented sex on the boards of large listed companies to 33%. By promoting more equal participation of women and men in corporate leadership, this measure contributes to reducing structural barriers that perpetuate pay disparities and strengthens gender equality in the labour market.

Statistical data on the gender pay gap

The **Hellenic Statistic Authority** collects data on the gender pay gap every four years through the Survey on the Structure and Distribution of Pay, the reference population being defined as the total number of employees (full-time and part-time). It covers enterprises employing at least ten salaried employees and operating in sections B to S, excluding section O (Public administration and defense; compulsory social security), of the statistical classification of economic activities NACE Rev. 2. The most recent data available are through the aforementioned Survey on the Structure and Distribution of Pay in **2022.**
[See Annex: Hellenic Statistic Authority_GenderPayGap2022.xlsx]

EUROSTAT data

According to the latest provisional data from EUROSTAT, the **gender pay gap in Greece in 2023 was 13.6%,** slightly higher by 0.1 p.p. than in 2022 (13.5%). At EU-27 level the gender pay gap was 12.0% in 2023 (provisional data).

	2017	2018	2019	2020	2021	2022	2023
Greece Total	*:*	10.4	:	:	:	13.5	13.6(p)
EU Total	*14.6*	*14.4*	*13.7*	*12.7*	*12.3*	*12.2*	*12.0(p)*

Source: Structure of Earnings Survey, Eurostat, last update 25.02.2025,
(p): provisional, (:) not available
https://ec.europa.eu/eurostat/databrowser/view/earn_gr_gpgr2__custom_18033243/default/table

Gender pay gap in Greece

2010	2014	2018	2022	2023
15.0	12.5	10.4	13.5	13.6 p

Eurostat (2025), Database: sdg_05_20

Up to 2018, the gender pay gap in Greece recorded a steady decline (a reduction of 4.6 percentage points compared to 2010), consistently remaining below the EU-27 average. This trend, however, was reversed in 2022, when the gender pay gap increased by 2.9 percentage points relative to 2018 and, for the first time, surpassed the corresponding EU-27 average (12.2%).

Gender pay gap in Greece by age group

	2014	2018	2022	2023
Less than 25 years	-0.2	4.2	-3.3	-4.4
25 -34 years	2.1	1.6	4.4	6.1 p
35-44 years	8.4	9.0	10.7	12.5 p
45-54 years	14.5	9.8	15.4	15.9 p
55-64 years	17.5	15.3	19.7	19.2 p
65 years or over	4.8	34.5	27.1	25.1 p

Eurostat (2025), Database: earn_gr_gpgr2ag

The gender pay gap appears to be positively correlated with age, as older cohorts exhibit a wider gap. Since 2018, the 65+ age group has recorded the highest gender pay gap, as well as the steepest increase over the past eight years. The age groups 25–34, 45–54 and 55–64 followed the pattern of a narrowing gender pay gap until 2018, followed by an increase in 2022, while for the 35–44 age group the upward trend has been evident since 2018. By contrast, in 2022 the pay gap narrowed for both the under-25 and the 65+ age groups.

Gender pay gap in Greece by type of ownership of the economic activity

	2014	2018	2022
Public ownership	13	7.7	13.4
Private ownership	16.4	17.2	15.9

Eurostat (2025), Database: earn_gr_gpgr2ct

The type of sector (ownership of economic activity) in which an employee is engaged affects not the direction, but the magnitude of the gender pay gap, with disparities being more pronounced in the private sector. Women are consistently paid less than men, and the divergence between the public and private sectors peaked in 2018, subsequently following a downward trajectory and narrowing to less than 2 percentage points in 2022 (compared to 9.5 in 2018). The gender pay gap in both sectors exhibits a cyclical pattern over four-year periods: in the public sector it has remained relatively stable over the past eight years, showing a significant decrease in 2018 and a corresponding increase in 2022. By contrast, in the private sector a marginal increase (below one percentage point) was observed in 2018, followed by a comparatively larger decrease in 2022.

Gender pay gap in Greece by type of working time

	2014	2018	2022	2023
Part-time	3.5	-8.3	-5.3	-3.4 p
Full-time	10.3	10.1	14.2	14.2 p

Eurostat (2025), Database: earn_gr_gpgr2wt

The type of employment (full-time versus part-time) appears, on the other hand, to affect the direction of the gender pay gap. Among full-time employees, women consistently earn lower wages, with the disadvantage narrowing slightly in 2018 and widening again in 2022. In contrast, among part-time employees a gender pay gap to the detriment of men has been observed since 2018; although it decreased by 3 percentage points, it nevertheless persisted in the same direction in 2022. It is also noteworthy that the gender pay gap in full-time employment has consistently been larger than that in part-time employment.

Gender pay gap in Greece by economic sector

NACE_R2 (Labels)	2014	2018	2022	2023
Public administration and defence; compulsory social security	:	-16.7	:	:
Information and communication	21.7	23.6	24.6	24.9 p
Wholesale and retail trade; repair of motor vehicles and motorcycles	18.3	18.6	20.2	20.2 p
Financial and insurance activities	16.8	17.0	19.2	19.4 p
Manufacturing	19.9	17.9	18.0	17.8 p
Real estate activities	-6.2	18.1	17.9	18.8 p
Business economy	18.6	17.5	15.6	15.5 p
Electricity, gas, steam and air conditioning supply	26.9	22.0	14.5	13 p
Human health and social work activities	8.4	12.6	14.5	14.5 p
Professional, scientific and technical activities	12.0	26.8	13.8	13.3 p
Industry, construction and services (except public administration, defense, compulsory social security)	12.5	10.4	13.5	13.6 p
Construction	6.3	10.2	12.6	9.9 p
Transportation and storage	15.2	22.3	9.7	10.2 p
Mining and quarrying	-2.1	5.3	9.5	7 p
Education	9.6	10.9	9.1	9.4 p
Arts, entertainment and recreation	12.1	5.0	8.6	8.8 p
Accommodation and food service activities	10.5	7.7	7.3	7.2 p
Administrative and support service activities	15.0	4.7	6.6	7.9 p
Other service activities	28.2	8.8	4.6	5.2 p
Water supply; sewerage, waste management and remediation activities	6.2	9.9	-5.4	-4.4 p

Eurostat (2025), Database: earn_gr_gpgr2

The economic sectors with the highest average gender pay gap are: (a) information and communication; (b) wholesale and retail trade, including the repair of motor vehicles and motorcycles; and (c) electricity, gas, steam and air conditioning supply — all sectors in which women are underrepresented. Real estate activities recorded the largest increase in the gender pay gap over the period 2014–2020 (24.1 percentage points), while other service activities registered the largest decrease (23.6 percentage points).

LABOUR INSPECTORATE

By virtue of Ministerial Decision No. 67759/2022 (3795 B') the Labour Inspectorate started operating as an Independent Administrative Authority, responsible for monitoring and inspecting the enforcement of labour law, in continuation of the work done by the Labour Inspectorate.

According to article 103, para. 2, case e of Law 4808/2021 (G.G. A 101/19.6.2021) *«Protection of Labour – Establishment of the Independent Authority «Labour Inspectorate» - Ratification of the ILO Violence and Harassment Convention No. 190 – Ratification of the ILO Promotional Framework for Occupational Safety and Health Convention No. 187 – Transposition of Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance, other provisions of the Ministry of Labour and Social Affairs and other urgent regulations»,* the Labour Inspectorate shall inspect inter alia the enforcement of and compliance with the legislation on the **promotion of the principle of equal treatment** irrespective of sex, racial or ethnic origin, religion or belief, disability, age or chronic disease or sexual orientation, taking into account also cases of multiple discrimination, and also the **fight against discrimination** on the grounds of sex, gender identity and sexual orientation in the field of employment and occupation. To this end, the Authority takes both preventive and repressive measures, such as informing workers and employers on the proper application of law provisions and conducting inspections on the application of labour law provisions respectively.

Moreover, by virtue of Law **4443/2016** (G.G. A'232/9.12.2016) *«I) Transposing Directive 2000/43/EC implementing the principle of equal treatment between persons irrespective of racial or ethnic origin, Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation and Directive 2014/54/EU on measures facilitating the exercise of rights conferred on workers in the context of freedom of movement for workers , .. and other provisions»* any form of discrimination is prohibited on the grounds of race, colour, national or ethnic origin, descent, religion or belief, disability or chronic disease, age, family or social status, sexual orientation, gender identity or characteristics in the field of employment and occupation. The Labour Inspectorate shall address cases of violation of the principle of equal treatment, either following complaints or following an order by the Ombudsman, who retains the power to conduct own inquiry and adopt final conclusion (article 20 para. 5 of Law 4443/2016).

The Regional Industrial Relations Inspectorates inform without delay the Ombudsman both upon receiving a complaint and after completing their investigative actions and imposing sanctions. Complaints are handled in accordance with the labour dispute resolution process (article 23 of Law 4144/2013, 88 A'), where the Ombudsman is also present. In cases where violations are identified, the Authority shall impose **administrative sanctions** and, where appropriate, shall file **complaints** for the imposition of penalties.

The violation of the principle of equal treatment of men and women regarding access to employment and occupation, including their career development and vocational training, together with education for employment, working terms and conditions, including pay and termination of employment, under article 20 of Law 4443/2016 is handled in accordance

with Ministerial Decision No.80016/01.09.2022 (4629 B') «*Classification of Infringements and setting of fine amounts imposed by the Labour Inspectorate* ….». This is one of the infringements that are classified as «severe» and give rise to administrative sanction of 2.000,00€ per affected worker.

Workers whose rights are violated may have recourse to the Labour Inspectorate by submitting a formal or anonymous complaint via the electronic service for complaints on the site of the Labour Inspectorate **www.hli.gov.gr**, via e-mail, by visiting the relevant inspection department or by calling the **1555 hotline**. If violations are identified, administrative and/or penal sanctions shall be imposed, as provided for by the legislation in force.

In 2025 the Independent Authority of the Labour Inspectorate did not handled cases of violation of the principle of equal pay of men and women, either via labour dispute resolution process or by means of an anonymous complaint and subsequent on-site inspection.

Article 5 – The right to organise

LEGISLATIVE FRAMEWORK

Regarding the current legislative framework on the right to organize, please refer to the information given in the previous report on article 5, i.e. the *5th Greek Report on the Implementation of the Revised European Social Charter (2022)*.

Moreover, we would like to state the following:

Pursuant to the provisions of article 381§5 of the Labour Code (Presidential Decree 62/2025 A'121), **specific protection and facilitations are provided for members of trade unions governing bodies**, such as protection against dismissal.

More specifically, the termination of the employment contract is invalid in the case of:

a) members of the governing body of a trade union, in accordance with article 92 of the Civil Code,

b) members of the provisional governing body of the trade union, within the meaning of article 79 of the Civil Code, which is appointed by a court, in accordance with article 69 of the Civil Code and

c) members of a governing body who are elected provisionally during the establishment of the trade union.

This prohibition shall be valid throughout the members' term of office and for one year thereafter, unless paragraph 10 of article 381 is applicable.

According to para.6 of article 381, the foregoing protection shall be granted to the following extent:

- If the organization has up to 200 members, 5 members of its governing body shall be protected
- If the organization has up to 1000 members, 7 members of its governing body shall be protected
- If the organization has more than 1000 members, 9 members of its governing body shall be protected.

The order of priority of the members to be protected shall be specified in the Articles of Association. If the Articles of Association make no such provision, the order of priority for protection shall be the following: the Chairman, the deputy Chairman or Vice-Chairman, the General Secretary, the Deputy General Secretary, the Treasurer and all other members in the order of their election (article 381§7).

Moreover, pursuant to article 381, para. 8, the following shall also be protected: the first 21 founding members of the first trade union set up in the undertaking or establishment or of the occupational branch, on condition that the undertaking in which they work employes more than eighty (80) workers. This protection shall be valid for one year from the date of signature of the memorandum of association. If the organization is not in fact set up within six (6) months of the signature of the memorandum of association, the protection of the founding members shall cease and shall be valid for the members of the next organization to be set up.

Finally, regarding the protection of trade union officers who participate in the Executive Committee, the Secretariat of the European Trade Union Confederation and the European Works Councils of groups of undertakings, the provisions of article 381 (article 381§11) shall apply respectively.

Moreover, article 382, para. 7 of the Labour Code stipulates the following: two (2) representatives of the governing body of the most representative firm-level trade union or failing that, one (1) representative of the local labour center are entitled to be present during inspection conducted by Labour Inspectors and submit their observations. The presence of third persons is prohibited, other than that of workers who are present at that particular moment in the enterprise and of their representatives.

ARMED FORCES - POLICE

Regarding the right to organize of serving officers of the Armed Forces and of the Hellenic Police, please refer to the previous report on article 5, i.e. the *5th Greek Report on the Implementation of the Revised European Social Charter (2022)*.

a) *Please indicate what measures have been taken to encourage or strengthen the positive freedom of association of workers, particularly in sectors which traditionally have a low rate of unionisation or in new sectors (e.g., the gig economy).*

Regarding the new economic sectors, such as digital platform workers, we would like to inform you of the following:

Article 133 of the Labour Code provides for the following:

"1. Service providers who are natural persons and are connected to digital platforms under independent contractor agreements or works contracts, have the right to establish organisations with the objective of promoting their occupational interests.

2. Service providers who are natural persons and are connected to digital platforms under independent contractor agreements or works contracts, have the right to strike, which is exercised by the organisations in para. 1. Articles 415 to 417 and 419 shall apply mutatis mutandis.

3. The organisations in para. 1 have the right to collectively bargain and conclude collective agreements, in accordance with article 394, para. 2."

b) *Please describe the legal criteria used to determine the recognition of employers' organisations for the purposes of engaging in social dialogue and collective bargaining.*

c) *Please describe the legal criteria used to determine the recognition and representativeness of trade unions for the purposes of engaging in social dialogue and collective bargaining.*

1. It is noted that Law 1264/1982, as codified by Presidential Decree 62/2025 and in force today, does not apply to employers' organisations, where the provisions of the Civil Code regarding trade unions (articles 78-107), the relevant provisions of the Introductory Law of the Civil Code (articles 12, 107-108) as well as special provisions apply.

Article 368, para.3 of the Labour Code provides for the following types of trade unions:

«3. Trade union organisations shall be classified as primary, secondary and tertiary.

a) Primary trade union organisations are:

(aa) basic trade unions,
(ab) local branches, as provided for in their articles of association, of trade union organisations for a larger area or for the whole of Greece, but only as regards the right to become members of the corresponding labour center,
(ac) associations of persons, one for each establishment, undertaking, public service, public law legal entity, local self-government agency, founded by at least ten (10) workers by means of memorandum of association which they submit at the General Register of Workers' Trade Union Organisations under article 369 and communicate to the employer, on condition that the total number of workers does not exceed forty (40) and that there is no basic trade union with at least half that membership. If after the establishment of any such association of persons, one of the above conditions ceases to be satisfied, the association shall automatically be dissolved. The memorandum of association must specify the purpose of the association, designate two persons to represent it and provide for its duration, which shall not exceed six months.
Associations of persons shall be governed by both article 416.1.c and, mutatis mutandis, by the provisions concerning trade unions in article 370, para.1a and article 374, paras. 1, 5, 6, 7 and article 375.
The election of representatives of the association of persons shall take place under the surveillance of a three-member election supervisory committee.
b) Secondary trade union organisations are Federations and Labour Centers. Federations are associations of at least two (2) trade unions in the same branch or related branches of economic activity or the same occupation or related occupations. Labour Centers are associations of at least two (2) basic trade unions and local branches having their registered offices within the area of the corresponding labour center, irrespective of the place of employment of their members.
c) Tertiary trade union organisations (confederations) are associations of federations and labour centers.».

Furthermore, article 399 of the Labour Code regulates issues relating to the terms and conditions for the conclusion of collective labour agreements as well as issues relating to the legitimacy of trade union representatives as follows:
The following shall be legally entitled to conclude collective agreements:
a. workers' and employers' trade union organisations at all levels within their field of activity, as well as associations of persons under the terms and conditions of article 396, para. 5, on condition that they are registered with the corresponding registers of para. 44 of the present article.
More specifically collective labour agreements mentioned in article 396, para. 3, shall be concluded on behalf of the workers, by the most representative tertiary trade union organisation. The remaining labour collective agreements under article 396, shall be concluded on behalf of the workers by the most representative workers' trade union organisation within the scope of the labour collective agreement.
b. Any employer on behalf of the workers he/she employes in his/her enterprise.

c. On behalf of workers in law firms, notary offices or other offices, the relevant collective agreement shall be signed, or the arbitral procedure shall be conducted between workers' trade union organisation and the relevant Public Law Legal Entity, to which the employers belong.

2. The representativeness of workers' trade union organisations shall be evaluated by the number of union members who voted in the most recent elections for their governing bodies. The representativeness of employers' organisations shall be evaluated by the number of workers bound by dependent employment contracts with the members of the organization or their members who may even be a natural person, sole proprietorship or enterprise, according to the Employers Organisation General Register (GE.MH.O.E.).

The competence, responsibility and/or representativeness for the conclusion of a labour collective agreement, as well as the existence and the legal status or the nature of workers trade unions and employers' organisations may be contested by bringing an action before the Single Member Court of First Instance within the territorial jurisdiction of which the defendant's head office or domicile is situated. The action shall be heard in accordance with articles 591 et al. of the Code of Civil Procedure and the specific provisions of the present law. The following have a legitimate interest in bringing an action before a court, as appropriate: the workers' trade union, the individual employer and the employers' organisation.

Action may be brought no later than ten (10) days after the commencement of negotiations. Upon serving the documents of the action, all negotiations are suspended until final judgement is passed. The hearing date shall be set within five (5) working days after action is brought, irrespective of the number of cases heard on that day. The action and the writ of summons are served on the defendant no later than forty-eight (48) hours before the hearing. Judgment is passed within fifteen (15) days.

An appeal may be lodged within ten (10) days after first instance decision is passed. Appeal hearing date shall be set within fifteen (15) days after it is lodged. The appeal and the writ of summons are served on the defendant no later than seven (7) working days before the hearing. Judgment is passed within fifteen (15) days. In any case, action may be brought within ten (10) days after the entry into force of the collective labour agreement, without suspending it, while the same above-mentioned time-limits shall apply.

Information on judgements passed in accordance with the present article shall be included in the defendant, plaintiff or any third-party records kept at the Employers Organisation General Register (GE.MH.O.E.) and the Workers Trade Union General Register (GE.MH.S.O.E.).

3. (a). Regarding the legitimacy of trade union representatives, the relevant provisions in their articles of association shall apply.
(b). Regarding the legitimacy of associations of persons representatives, in case a' of paragraph 1, the regulations in their memorandum of association shall apply.

4. (a) All workers' trade unions, workers' associations of persons and employers' organisations and in particular those that conclude labour collective agreements and/or appoint their representatives in the governing bodies of entities supervised by the Ministry of Labour and Social Security, as well as in its collective bodies, are required to be registered at the Ministry's Register of workers trade unions and employers organisations which is kept at the ERGANI Information System of the Ministry of Labour and Social Security.
(b) A General Register of Workers Trade Unions (GE.MH.S.O.E.) shall be developed at the Ministry of Labour and Social Security where the following data shall be kept: ba) trade union's articles of association and any amendments thereto, as well as any notice of its dissolution, bb) the number of the members who voted in the elections of the trade union's governing bodies, bc) the composition of the trade union's governing bodies, bd) the head office of the trade union and its contact details and be) its financial statements, provided that there are state or co-financed sources of funding for the organization itself or its affiliated entities.
(c) A General Register of Employers Organisations (GE.MH.O.E.) shall be developed at the Ministry of Labour and Social Security where all employers organisations are required to be registered and where the following data shall be kept: ca) the articles of association of the organisation and any amendments thereto, as well as any notice of its dissolution, cb) the number of the members who voted in the elections of the organisation's governing bodies, cc) the composition of its governing bodies, cd) the head office and its contact details, ce) the number of workers employed by each member of the employers' organization and cf) its financial statements, provided that there are state or co-financed sources of funding for the organization itself or its affiliated entities.
(d) By decision of the Minister of Labour and Social Security all issues relating to the development of the Register of Workers and Employers Organisations shall be regulated. The decision shall also regulate issues relating to disclosure of its data and any necessary technical detail and information relating to the registry's data and the protection of personal data, in particular in connection with the representativeness of workers and employers' organisations».

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By virtue of Article 30C of Law 1264/1982, the establishment of trade union organizations is allowed among active-duty military personnel.

Regarding question c, we would like to point out that, concerning the legal recognition of trade unions by the competent Court of First Instance, the procedure provided for in the Civil Code (articles 78 et al.) is respected, in accordance with article 30C, para. 14 of Law 1264/1982.

As regards the criterion for their representativeness, in accordance with the definition given in article 21 para. 4 section c′ of Law 1264/1982, the most representative trade union is the secondary trade union that has the greatest number of members who voted during the most recent elections for their governing bodies.

d) *Please provide information:*
• on the status and prerogatives of minority trade unions;
• on the existence of alternative representation structures at enterprise-level, such as elected worker representatives.

- Regarding the **legal status** and the **prerogatives** accorded to minority trade unions, under article 383, para. 3 of the Labour Code, referring to leaves of absence granted by the employer mandatorily, the following are provided for:

«3. Leaves of absence referred to in para. 2 shall be limited to thirty (30) days per year to the members of the Executive Committee or the Bureau of the non-representative tertiary organisations and to the Chairman of the Executive Council, of the second most representative secondary organization, on condition that this organization has as many voting members as the ones referred to in cases b and c of para.2, and up to 1/3 of the time referred to in cases d, e, f, g and h of para. 2 for trade union officials of the second most representative firm-level trade union organization referred to in the above-mentioned cases».

Moreover, article 397, para.5 of the Labour Code provides for the following:

«5. Workers' trade unions of the same enterprise, sector or occupation are entitled to intervene in the negotiations that concern them.
If they cosign the labour collective agreement, they are bound by it».

Article 404 of the Labour Code also provides for the right of workers' or employers' organisations, not bound by an agreement, to join a labour collective agreement as follows:

«1. Unions and employers' organisations that are not bound by collective agreement may mutually join a labour collective agreement referring to their category. A trade union may join a labour collective agreement which the employer is already bound by. Joining is possible by means of a private document that is communicated to the parties that concluded the labour collective agreement. This document is submitted to the local authorities of the Ministry of Labour and Social Security and is registered in the specific book for labour collective agreements. In the event of joining an agreement, paragraphs 2, 3, 4, 5 and 6 of article 398 shall apply. Joining a firm-level labour collective agreement by the employer or trade union of another company is not possible».

- Regarding the **existence of alternative representation structures** at enterprise level, the following apply:

Articles 425 to 441 of the Labour Code codified **Law 1767/1988** on *«Works councils and other labour law provisions – Ratifying ILO Convention No. 135»* (G.G. A'63/06.04.1988), which introduces **works councils**. Workers in any enterprise employing at least fifty (50) people fall within the scope of this regulation. They shall have the right to elect, and form works councils to represent them in their dealing with the enterprise. In enterprises in which there are no trade union organisations, only twenty (20) workers shall be required (article 425).

The function of works councils is participatory and consultative, aiming at improving the working conditions of workers in relation to the undertaking's growth and development. The operation of such works councils shall at no point prejudice the purpose,

means and rights of trade unions which, by means of their activity in accordance with articles 22 and 23 of the Constitution and of articles 368 to 386, 415 to 417 and 419 of the Labour Code, safeguard and promote the labour, financial, social insurance, social and trade union interests of employees (article 436, para.1).

Agreements reached between employers and works councils shall not be binding upon trade unions to pursue more favourable regulations for their employees by means of collective agreements (article 436, para.2). Works councils shall co-operate with the trade union organization in the enterprise and shall keep that organization informed on matters falling within the council's competence (article 436, para.3).

Works councils have the following competences:

1. They shall decide jointly with the employer on the following issues, provided they are not regulated by law or a collective labour agreement, and provided there is no trade union organization in the enterprise:

(a) the drawing up of internal rules for the enterprise.

(b) health and safety rules in the enterprise,

(c) setting up information programs about new methods of organizing work and the use of new technologies.

(d) scheduling of continuing education, and training programs for the staff, in particular after each major change in technology,

(e) the manner of monitoring the presence and behaviour of the staff in the context of protecting workers' privacy, especially in relation to audio-visual means.

(f) scheduling holiday leaves.

(g) the reentry into the workforce of disabled workers who have been injured in occupational accidents at the enterprise and their placement in jobs appropriate for them,

(h) planning and supervising cultural, recreational and social events and social facilities.

A written agreement shall be drawn up in regard of the above-mentioned matters, which shall take effect upon signature, shall have regulatory effect, be posted on the works council notice board and be communicated to the trade union organization of the enterprise or, if none exists, to the corresponding secondary level trade union (article 436, para.4).

2. Works councils shall study and propose ways to improve productivity for all the component factors of production. To this end, they may call upon experts from the organization provided for in article 10, para.2 of this law (article 436, para.5).

3. They shall propose measures to improve the terms and conditions of work (article 436, para.6).

4. They shall propose, from among their members, nominations for their representatives on the Health and Safety Committee (article 436, para.7).

<u>The Association of persons under article 369, para. 3 of the Labour Code</u>.

Associations of persons, one for each establishment, undertaking, public service, public law legal entity or local self-government agency, are founded by at least ten (10) workers, by means of memorandum of association, which they lodge at the General Register of Workers Trade Union Organisations under article 369 and communicate to the employer, on condition that the total number of workers does not exceed forty (40) and that there is

no basic trade union with at least half that membership. If, after the establishment (where appropriate) of any such association of persons, one of the above-mentioned conditions ceases to be satisfied, the association shall automatically be dissolved. The memorandum shall specify the purpose of the association, designate two persons to represent it and provide for its duration, which shall not exceed six months.

Associations of persons shall be governed by article 416.1.c and article 370.1a as well as article 374.1,5,6,7 and article 375 of the Labour Code.

The election of the representatives of an association of persons shall take place under the surveillance of a three-member election supervisory committee.

The Association of persons under article 396, para. 5 of the Labour Code.

Firm-level collective agreements are concluded by order of priority by trade union organizations in the enterprise that cover workers or if there is no trade union in the enterprise, by an association of persons, irrespective of the occupational category, post or specialty of workers in the enterprise, and failing these, by the corresponding primary sectoral trade unions and the employer.

The association of persons under article 396, para.5 is established by at least three fifths (3/5) of the number of workers in the enterprise, irrespective of the total number of workers in it and without limit to its duration. If after the establishment (where appropriate) of any such association of persons, the above-mentioned condition of the three fifths of workers ceases to be satisfied, the association shall automatically be dissolved. For all other issues relating to the association of persons, article 368.3.a.cc of the Labour Code shall still apply.

Workers' representatives who shall conduct negotiations before mass dismissals.

According to article 355 of the Labour Code, legitimate representatives of workers' basic trade union in the enterprise or undertaking whose members are at least 70% of workers together with the majority of the workers dismissed shall be considered as workers representatives. If in the enterprise there are more than one basic trade unions without none of them covering seventy (70%) percent of workers together with the majority of those who are dismissed, workers nominated by the governing bodies of trade unions by their common statement to the employer are considered as workers representatives. These representatives are nominated proportionately to the strength of trade unions, on condition that seventy percent (70%) in total of workers and the majority of those involved in the dismissals belong to the enterprise. The nomination of these representatives must be done within three days from the date of the employer's notification provided for in article 354, para. 2. If there is no trade union or unions that satisfy the conditions referred to in the previous paragraphs, workers are represented by a three-member committee in enterprises or undertakings employing from twenty (20) to fifty (50) workers and a five-member committee in enterprises or undertakings employing more than (50) workers. The members of the above-mentioned committee shall be elected by means of secret ballot by the assembly of the enterprise or undertaking's workers. The assembly is convened within seven days from the date the relevant employer's invitation is

made available at the workplace. The invitation specifies the agenda, the date, the time and the place of the assembly which shall be communicated to the competent Department of Labour Relations of the Labour Inspectorate. In order to conduct the vote, the presence of at least fifty-one percent (51%) of workers in the enterprise or undertaking is required. For the election of representatives, the relative majority of all persons present is required. If the election of workers' representatives is not successful, they shall be appointed the day after the assembly is convened by the most representative Labour Center among the workers of the enterprise or undertaking. If the workers' representatives are not established by means of the above-mentioned procedure, workers shall be represented by a three- or five-member committee composed of workers who have the longest years of service within the enterprise or undertaking.

Finally, pursuant to article 202, para. 6 of the Labour Code, the following shall apply: "Working time arrangements under paragraphs 1 and 2 shall be specified by virtue of firm-level labour collective agreements or agreement between the employer and the union within the enterprise referring to its members or agreement between the employer and the works council or agreement between the employer and an association of persons. The association of persons referred to in the previous section may be established by at least twenty-five percent (25%) of a company's workers that employes more than twenty (20) workers and fifteen percent (15%) if the total number of company workers is maximum twenty (20) employees. For all other issues, the provisions referred to in article 368, para.3 subpara.ac´shall apply. If there is no trade union or no agreement is reached between the trade union and the employer, working time arrangements may apply following written agreement between the employer and the worker. In any case, termination of an employment contract is prohibited on grounds of an employee's non-consent to working time arrangements."

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Serving military trade union organisations are distinguished into primary and secondary. They are not distinguished into minority trade unions. The representatives of the military are registered members of trade unions who are elected in accordance with the procedure provided for in article 30C, para. 15 of Law 1264/1982.

Article 6 – The right to bargain collectively

Article 6§1 – Joint Consultation

a) *Please state what measures are taken by the Government to promote joint consultation.*

The process of setting an adequate statutory minimum wage and daily wage is an **institutionalized form of organized consultation** that promotes the participation of all key social partners and the scientific community in shaping national wage policy.

Article 141A of **the Labour Code** defines a specific procedure for determining the adequate statutory minimum wage and daily wage for the years **2025, 2026, and 2027.** This procedure is based on collective documentation, institutional cooperation, and the participation of both scientific and social actors, with the aim of setting minimum limits based on objective economic and social data.

The initiation of the procedure provides for a consultation process, during which parameters related to the situation and perspectives of the Greek economy are examined, such as productivity, competitiveness, price, income, and wage level, employment, unemployment, and the purchasing power of workers, as well as the overall cost of living. It is expressly provided that the implementation of the procedure cannot lead to a reduction in the existing minimum thresholds. Within this framework, two bodies with distinct roles are established: the **Scientific Committee** and the **Consultation Committee**.

The Scientific Committee is established by joint decision of the Minister of Labour and Social Security and of National Economy and Finance and consists of five independent experts from the academic or research community, including the President of the Council of Economic Experts and a representative of the Hellenic Statistical Authority. This Committee is entrusted with the task of formulating fully reasoned and documented opinions on the level of the statutory minimum wage and daily wage, the criteria applied for their setting and updating, and the assessment of their adequacy in relation to economic conditions. In addition, the Commission may recommend indicative reference values or variations for specific groups of workers, in accordance with the principles of proportionality and equal treatment.

At the same time, a Consultation Committee is being set up, which operates within the Organization for Mediation and Arbitration (OMED) and has a three-year term. It is chaired by the President of OMED and includes representatives of social partners at national level: the General Confederation of Greek Workers, ADEDY, the Association of Enterprises and Industries, the General Confederation of Professionals, Craftsmen and Traders of Greece, the Hellenic Confederation of Commerce and Entrepreneurship, the Association of Greek Tourism Enterprises, and the Hellenic Federation of Industries. The Consultation Committee shall formulate reasoned opinions, either unanimously or by majority, referring to the minority opinion, on issues examined by the Scientific Committee.

The procedure begins each year with an invitation sent within the first fifteen days of January by the President of OMED to specialized scientific and research bodies, such as the Bank of Greece, the Hellenic Statistical Authority, the Public Employment Service, the Center for Planning and Economic Research (KEPE), the Foundation for Economic and Industrial Research (IOBE), the Labour Institute of GSEE/ADEDY, the Small Business

Institute of the Greek Confederation of Small and Medium-Sized Enterprises, as well as the institutes of employers' associations. By January 25, these bodies are required to prepare and submit assessment reports on the current minimum wage and daily wage, with proposals for their adjustment based on the specified criteria.

These reports are collected and sent by January 31 to the Scientific Committee and the Consultation Committee, so that they can express their opinions by February 15. The opinions and reports are then sent to the Center for Planning and Economic Research, which, in collaboration with the Scientific Committee, prepares the consultation report. This conclusion includes a systematic recording of the views of the social partners, their points of agreement and disagreement, as well as documentation based on the criteria set out in the law. The conclusion shall be finalized by February 28 and forwarded without delay to the President of OMED who shall submit it to the Ministers of Labour and Social Security and of National Economy and Finance by the 5th of March.

The Ministry of Labour and Social Security posts all relevant documents, reports, opinions, and conclusions on its official website, ensuring the transparency of the procedure. By March 15, the relevant ministers propose the level of the statutory minimum wage and daily wage to the Cabinet, and by the end of March, a joint ministerial decision is issued on their setting, following the Cabinet's consent.

The procedure set out in Article 141A of the Labour Code ensures the systematic participation of all bodies involved, the documentation of proposals through scientific data, and the full publicity of its stages and results, thus enhancing coordination among administration, social partners, and research institutions in shaping the minimum wage policy.

By Ministerial Decision No. 33093/16.12.2025 (B' 6789), as provided for in Article 5 of Law 5163/2024 "Transposing EU Directive 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union – Public sector personnel salary adjustment – Regulations on setting the minimum salary for the years 2025, 2026, and 2027, and other provisions" (A' 199), the Action Plan for the Promotion of Collective Bargaining in Greece was drawn up for the period 2026–2030.

The action plan is based on **five priority axes**.

The **first** axis will be completed within the first quarter of 2026 and concerns the strengthening of the regulatory framework for collective bargaining through the enactment of the Social Accord. The Social Accord includes provisions that form a coherent framework for strengthening collective bargaining, aiming to achieve high-quality employment. At the same time, it aims to: a) facilitate the extension of collective labour agreements so that more workers are protected by these, b) fully protect employees after the expiry of collective labour agreements, as their terms continue to apply even after the three-month extension period has elapsed, thus re-establishing full after-effect, and c) speed up procedures in case of disagreement between workers and employers, by means of better and faster procedures for dispute resolution via the OMED (Organization for Mediation and Arbitration).

The **second** axis covers the period from the second quarter of 2026 to the second quarter of 2027. During this period, a competent Working Group is to be set up to strengthen collective bargaining at the Ministry of Labour and Social Security. The Working Group will be set up for five years with a tripartite composition, consisting of representatives of the Ministry of Labour and Social Security and the National Social Partners. The Group will hold regular meetings to monitor the policy of strengthening collective bargaining within the Action Plan.

The **third** axis covers the second quarter of 2026 until the second quarter of 2027 and provides for the data collection, digitalization and availability to enable systematic data collection, processing and analysis relating to the coverage of employees by collective agreements. To this end, the electronic filing of collective labour agreements, the creation of a digital register of collective labour regulations and collective agreements, and the data collection on the evolution of collective agreement coverage rates are being promoted.

The **fourth** axis covers the second quarter of 2026 to the fourth quarter of 2030 and provides for studies, surveys, information and training activities on issues related to collective bargaining. In this regard, the aim is to prepare studies, organize relevant conferences in cooperation with international organizations and carry out information and training activities.

The **fifth** axis covers the period from 2028 to 2030 and includes monitoring the implementation of the Action Plan for the promotion of collective bargaining as well as targeted inspections for the implementation of the terms of collective labour agreements. The Action Plan will be monitored through the preparation of an annual monitoring and assessment report and enforcement of the terms of collective labour agreements. To this end, the Labour Inspectorate will carry out targeted interventions and inspections based on an operational plan drawn up in cooperation with the Ministry of Labour and Social Security, following the tripartite Working Group's proposals. In this way, both the Labour Inspectorate and the Ministry will be able to gather valuable information on the labour market state, contributing to the development of even more targeted and effective policies.

The Greek Action Plan for the Promotion of Collective Bargaining for the period 2026-2030, in its official English version, is available on the website of the Ministry of Labour and Social Security at the following link:
https://ypergasias.gov.gr/en/labour-relations/collective-employment-relations/action-plan-for-the-promotion-of-collective-bargaining-in-greece-2026-2030/

b) *Please describe what issues of mutual interest have been the subject of joint consultation during the past five years, what agreements have been adopted as a result of such discussions and how these agreements have been implemented.*

In Greece, it is the established policy and intention of the Ministry of Labour and Social Security to promote effective consultation with social partners via regular meetings and to ensure that their positions and opinions are given equal consideration in legislative initiatives. Recognizing the multiple challenges and weaknesses of the social dialogue system, the Ministry has undertaken systematic initiatives aimed at enhancing both tripartite social dialogue and bilateral dialogue among social partners.

The **Supreme Labour Council (A.S.E.)** is the standard form of tripartite social dialogue in the country. A significant part of the social dialogue on labour relations takes place during its meetings. It is worth noting that the Plenary Session of the Council gives its opinion to the Minister of Labour on requests for the extension and declaration of collective labour agreements as generally binding, so that these cover all employees falling within their scope.

Furthermore, an important institution for the strengthening of the social dialogue in Greece is the **Economic and Social Committee (O.K.E.)**, which was established in 1994, based on the model of the Economic and Social Committee of the European Union: tripartite division of the interests represented, i.e. a division into three Groups, one of employers/entrepreneurs, one of private and public sector employees, and one including other categories, such as farmers, self-employed people, consumers, environmental protection organizations, disabled people's confederation, gender equality organizations, and the local government.

As of May 2001, the Greek O.K.E. has become a constitutionally recognised institution of the Greek state. The OKE is required to formulate opinions on draft laws and policies that have significant social or economic impact, such as labour, development, and the environment. In addition, it may formulate opinions either at the request of the government or Parliament or on its own initiative.

A notable example of an agreement resulting from tripartite social dialogue is the signing of the tripartite National Social Accord at the end of November 2025. Specifically, throughout the past year, extensive tripartite dialogue took place at the Ministry of Labour and Social Security among the Ministry, the employees' representatives (GSEE), and the employers' representatives (SEV, GSEVEE, ESEE, SVE, SETE), which resulted in the signing of the 26/11/2025 "National Social Accord for the Strengthening of Collective Labour Agreements." It should be noted that there has never been an accord between the state and the National Social Partners on labour issues of such scope, while the purpose of the accord is to strengthen the legislative framework to increase the percentage of workers covered by collective labour agreements in Greece. The National Social Accord was also ratified by the Hellenic Parliament with the adoption of Law 5278/2026 (A'22).

c) *Please state if there has been any joint consultation on matters related to (i) the digital transition, or (ii) the green transition.*

Within the framework of a joint consultation between social partners, Articles 4, 5, and 7 of the National General Collective Labour Agreement (23.6.2021), with Registration Number 16/1.7.2021, provide for the following:

(i) Issues related to the ***digital transition***

«**ARTICLE 4 - Autonomous framework agreement on Digitalization**

The parties have decided to adopt the "European Framework Agreement on Digitalization" signed on June 26, 2020, by the European Trade Union Confederation (ETUC), the Union of European Employers' Associations, Industries and Enterprises (BUSINESSEUROPE), the European Organization of Small and Medium-sized Enterprises (SME United) and the European Centre of Public Enterprises (CEEP).

The text "European Framework Agreement on Digitization" is attached to this NGCLA and forms an integral part thereof.

ARTICLE 5 – Digital Skills

In the context of developing and implementing the "European Framework Agreement on Digitization", the parties agree to draw up an action plan for the implementation of the Agreement, giving priority to:

- Establishment of a joint working group on digital skills and employment, with the aim of preparing workforce and enterprises to seize the opportunities and address the challenges of digital transformation.»

(ii) Issues related to ***green transition***

«**Article 7 – Fair Transition to a low-carbon economy.**

The parties involved in the National General Collective Labour Agreement (NGCLA) reconfirm Article 66 of the 2018 NGCLA on the term and importance of the Fair Transition of workers to a low-carbon economy which will ensure the necessary support when there is a need for restructuring, retraining, and redeployment. They also consider their institutional participation in planning and acting for a fair transition to the post-lignite era through the Fair Development Transition Plan (FDTP) to be equally essential and necessary.

Since development policies should guarantee the full and equal participation of both workers and employers in the preparation, implementation, and monitoring of public policies for adaptation to climate change, including investment strategies, in accordance with the guidelines of the International Labour Organization, the parties to the NGCLA agree:

a) to establish, through their Institutes, a joint mechanism for monitoring trends and awareness-raising and training activities for the development of capacities and necessary skills in emerging industries, acquiring new skills in all sectors and retraining in vulnerable sectors, and

b) to send a joint letter to the Ministry of Labour and Social Affairs for the establishment of a new Division within the Supreme Labour Council dealing with the environment and labour. This Division will include, on the one hand, the parties to the NGCLA, proportionally and equally, and, on the other hand, a representative of the Ministry of Environment.»

Article 6§2 – Collective bargaining

a) *Please provide information on how collective bargaining is coordinated between and across different bargaining levels including information on:*
• the operation of factors such as erga omnes clauses and other mechanisms for the extension of collective agreements;
• the operation of the favourability principle and the extent to which local/workplace agreements may derogate from legislation or collective agreements agreed at a higher level.

As regards the current legislative framework on collective bargaining, we refer to the comments made in the previous report on Article 6, namely the *5th National Report on the Implementation of the Revised European Social Charter (2022).*

➢ With regard to the operation of factors such as **erga omnes clauses**, Article 404 of the **Labour Code** analyzes the terms and conditions under which a collective labour agreement may either be extended or a trade union may accede to it, as follows:
«Article 404. Accession to a collective agreement and extension of its scope.
1. Trade union organizations and individual employers not bound by a collective agreement may jointly accede to any collective agreement concerning them. Workers' trade union organizations may accede to any collective agreement already binding upon their employers. Accession to a collective agreement shall be effected by private contract; such contract shall be notified to the parties to the agreement and filed with the local branch of the Labour Inspectorate, which shall enter it in the special register of collective agreements. The provisions of article 398, subsections (2), (3), (4), (5) and (6) of this Act shall also be applicable in respect of accession.
An enterprise agreement shall not be open to accession by an employer or a workers' organization from another establishment.
2. By decision of the Minister of Labour and Social Security, it is possible to approve the Conclusion of the Supreme Labour Council and declare a collective labour agreement or arbitration award generally binding on all employees under the following conditions:
2.1. The extension of a collective labour agreement or arbitration award requires:
(a) an application submitted by any of the parties bound by it to the Minister of Labour and Social Security.
(b) documentation of the effects of the extension on competitiveness and employment and notification thereof to the Supreme Labour Council.
2.2. The Supreme Labour Council shall submit a reasoned opinion to the Minister of Labour and Social Security, taking into account:
(a) the application for extension,
(b) the documented confirmation by the competent service of the Ministry that the collective agreement already binds employers who employ more than 50% of the workers within the sector or occupation; and
(c) the outcome of the consultation of the bound parties before the Supreme Labour Council on the necessity of the extension and its impact on the competitiveness of enterprises, the way competition works, and employment.

2.3. Undertakings facing serious financial problems and undergoing pre-insolvency, quasi-insolvency, or insolvency proceedings, or out-of-court settlements or reorganization proceedings, regardless of whether the extended collective agreement provides for exemptions from the application of terms for employees in companies, in accordance with paragraph 8 of Article 396 of the Labour Code, may be exempted from the first subparagraph of paragraph 2 of this article, following a reasoned opinion of the Supreme Labour Council, in terms of conditions or in terms of the collective labour agreement or arbitration award as a whole, which is declared mandatory.
3. The extension shall take effect from the date of publication of the decision of the Minister of Labour and Social Security in the Government Gazette and shall be valid for three (3) months after the expiry of the collective regulation.
4. By decision of the Minister of Labour and Social Security, following opinion of the Plenary Session of the Supreme Labour Council, it is possible to specify the cases of exempted undertakings and any related issue concerning the application of this provision, in particular for the adoption of measures to protect existing jobs, specifically for each undertaking.
5. The provisions of this section concerning accession to a collective agreement and the extension of its scope shall apply also to workers engaged in agriculture, livestock husbandry and related occupations and to homeworkers, in so far as the collective agreements in question cover their respective branches of activity».

➢ With respect to the **principle of favorability** and the extent to which agreements at local/workplace level may deviate from legislation or collective agreements, the following cases apply:

i) According to Article 403 of the Labour Code, the following provisions apply:
«Article 10-Plurality of collective agreements
1. Where an employment relationship is governed by more than one collective agreement in force, the agreement containing the terms most favourable to the workers shall prevail.
In comparing and opting for the terms to be applied in this case, account shall be taken: a) of uniformity of remuneration and b) of uniformity of other conditions.
2. In the event of plurality, sectoral agreements and enterprise agreements shall prevail over occupational agreements.
By way of exception, in cases where undertakings are facing serious financial problems and undergoing pre-insolvency, quasi-insolvency, or insolvency proceedings, or out-of-court settlements or reorganization proceedings, the enterprise-level collective labour agreement shall prevail over the sectoral agreement, provided that the sectoral agreement does not provide for exceptions to the application of its terms in accordance with paragraph 8 of article 396.
By decision of the Minister of Labour and Social Security, following opinion of the Plenary Session of the Supreme Labour Council, the cases of exempted undertakings shall be specified and all relevant issues for the application of this paragraph shall be defined, for the adoption of measures to protect existing jobs, specifically for each undertaking.

3. The national sectoral or occupational collective agreement does not prevail over the corresponding local agreement".

ii) In accordance with Article 400 of the Labour Code- the following are provided for:

« Article 400 - Effects of a collective agreement.

1. The clauses of a collective agreement shall have immediate and binding effect.

2. Any terms of individual contracts of employment at variance with the clauses of a collective agreement shall prevail, provided that they give the workers greater protection.

3. Conditions of work specified in collective agreements shall take precedence over statutory provisions, provided that such conditions are more favourable to the workers, except in respect of mandatory statutory provisions applicable to both parties concerned».

Paragraph 4 of Article 382 of the Labour Code also stipulates that "It shall be the duty of the employer, or a fully authorized representative of the employer, to meet the representatives of the trade union organizations at their request, at least once a month and to endeavour to settle issues which are a cause of concern to the workers or their organizations".

b) *Please provide information on the obstacles hindering collective bargaining at all levels and in all sectors of the economy (e.g. decentralisation of collective bargaining).*

c) *Please provide specific details on:*

- *the measures taken or planned in order address those obstacles;*
- *the timelines adopted in relation to those measures;*
- *the outcomes achieved/expected in terms of those measures.*

As regards measures taken to address obstacles to collective bargaining, our country has drawn up an Action Plan on strengthening and promoting collective bargaining. Specifically, **Law 5163/2024** (Government Gazette A'199/06.12.2024) "Transposition of Directive (EU) 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union - Adjustment of public sector salaries - Provisions for setting the minimum wage for 2025, 2026, and 2027, and other provisions" Directive (EU) 2022/2041 was transposed into Greek law.

Specifically, Article 5 of the above law provides for the following:

"Article 5. Action plan to promote collective bargaining for the setting of wages (Article 4 of Directive (EU) 2022/2041).

1. By decision of the Minister of Labour and Social Security under paragraph 1(a) of Article 24, an Action Plan shall be drawn up after consultation with the social partners or in consideration of their agreement and proposals. The Action Plan shall have a duration of one (1) to five (5) years and shall set out a clear timetable and specific measures for the gradual increase of the collective bargaining coverage rate, with full respect for the social partners' autonomy. The measures envisaged in the Action Plan concern in particular: (a) encouraging the effectiveness of collective bargaining and the ability of trade unions and employers' organizations to conduct collective bargaining; b) creating databases with information, in particular, on wages, production cost, the competitiveness of the Greek

economy, and employment, and c) conducting studies, research, information, and training activities on collective bargaining issues.
2. For the preparation of the Action Plan, the Minister of Labour and Social Security invites the representatives of the social partners to submit their proposals for the Action Plan in paper form within a period of at least thirty (30) calendar days after receiving the invitation, and specifically invites:
a) on behalf of the trade unions, the General Confederation of Greek Workers (GSEE) and other secondary organizations proposed by GSEE, b) on behalf of employers' organizations, the Hellenic Federation of Enterprises (SEV), the Hellenic Federation of Industries (SVE), the General Confederation of Greek Small Businesses and Traders (GSEVEE), the National Confederation of Commerce and Entrepreneurship (ESEE), the Association of Greek Tourism Enterprises (SETE) and other employer organizations with broader representation proposed by them.
By decision of the Minister of Labour and Social Security, following a proposal by any social partner referred to in points (a) and (b), the above deadline may be extended by up to thirty (30) calendar days.
The Action Plan shall be issued within ninety (90) calendar days after the deadline for submitting proposals.
3. The social partners are entitled to propose to the Minister of Labour and Social Security the Action Plan they have agreed upon, or actions to promote collective bargaining, on which they agree, independently of or in parallel with the consultation procedure referred to in paragraph 2.
4. The first Action Plan referred to in paragraph 1 shall be issued within one (1) year of the entry into force of this Act.
5. Specifically for seafarers, when the collective bargaining agreement coverage rate falls below eighty percent (80%), an Action Plan shall be drawn up, by decision of the Minister of Shipping and Island Policy of paragraph 1(c) of Article 24, in accordance with the first, second and third subparagraphs of paragraph 1, to facilitate and promote the exercise of the right to collective bargaining for the purpose of setting wages, after consultation with the social partners or upon their agreement or proposals".

In this context, Ministerial Decision No.33093/16.12.2025 (B' 6789), as provided for in Article 5 of Law 5163/2024 "*Transposing EU Directive 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union – Public sector personnel salary adjustment – Regulations on setting the minimum salary for the years 2025, 2026, and 2027, and other provisions*" (A' 199), **the Action Plan for the Promotion of Collective Bargaining in Greece was drawn up for the period 2026–2030**. The said Action Plan is part of a broader effort to enhance collective labour agreements, which constitute a key mechanism for regulating employment terms. It aims at increasing the coverage of workers by collective regulations while enhancing transparency and predictability as regards working terms in the entire economy. At the same time, the Action Plan provides for interventions aimed at strengthening the role of National Social Partners as key actors of the social dialogue and

the labour market. By strengthening their organizational and bargaining capacity, the aim is to foster a framework for cooperation that promotes high-quality employment and addresses systemic labour market challenges. Thus, the Action Plan shall operate as an institutional shielding tool, with a view to improving the effectiveness of collective bargaining at national level in relation to the above-mentioned objectives.

With a view to promoting collective bargaining coverage, a comprehensive plan is established that combines concrete measures, a clear timeline in full respect of the autonomy of the social partners, which is designed along the following main axes:
a) Within the first quarter of 2026: Strengthening of the regulatory framework on collective bargaining – Enactment of the Social Accord.
b) From the second quarter of 2026 up to the second quarter of 2027:
(ba) Establishing the relevant Working Group within the Ministry of Labour and Social Security.
(bb) Data collection, digitalization and availability.
c) From the third quarter of 2026 up to the fourth quarter of 2030: Studies, surveys, information and training activities on issues relating to collective bargaining.
d) From 2028 to 2030:
(da) Monitoring the implementation of the Action Plan for the Promotion of Collective Bargaining
(db) Targeted inspections regarding the enforcement of collective labour agreement terms.

The exact text of the Social Accord is the following:
"SOCIAL ACCORD
MINISTRY OF LABOUR AND SOCIAL SECURITY - NATIONAL SOCIAL PARTNERS
1. Conclusion of sectoral collective labour agreements
1.1. With a view to ensuring social partner of broad representation, recognizing subsidiary competence of tertiary workers' organization (GSEE) to conclude or co-sign sectoral collective labour agreements, following a call made by the negotiating members of workers.
1.2. With a view to defining the scope of a sectoral collective labour agreement, facilitating the possibility of extending and also verifying the coverage rate of all workers in the sector, Business Activity Codes (KAD) shall be defined as a minimum within the text of sectoral collective labour agreements and reference will be made to any other information that identify each sector.
2. General Register of Trade Unions (GEMHSOE) and General Register of Employers Organizations (GEMHOE).
2.1 Information required for registration with the GEMHSOE and GEMHOE should be limited to what is necessary. More specifically, the following information shall be published in the Register of Employers:
- Constitution of the employers' organization, any amendments thereto and any instrument of its dissolution,

- total number of members of the employers' organization (not individual TIN Nos). Depending on the organization's structure, this number shall include all the enterprises or natural persons or unions/federations which are its members,
- composition of the administration bodies of the employers' organization,
- registered office and contact details of the employers' organization,
- total number of workers in the enterprises-members of the organization (provided that the immediate members of the organization are enterprises). The said obligation does not apply to organizations referred to in Law 1712/1987.

Relevant adjustment shall also apply to information published in the Register of Workers' Trade Unions.

2.2 Mitigation of sanctions as consequence of non-inclusion in the Registers. More specifically, registration constitutes a prerequisite only for extending collective labour agreements signed by the organization and for having recourse to the OMED, given that an assessment is required of the organization's representativeness and of the collective dispute significance. Moreover, registration should not cause suspension of rights deriving from trade union action.

2.3 The minutes of vote sorting and electronic vote counting, instead of being published in the GEMHSOE, shall be delivered by the judicial representative to the relevant Court of First Instance and shall be kept in the relevant trade union file.

3. Collective Labour Agreement Validity

3.1. Full after-effect of all Collective labour agreement regulatory terms after the expiry of the three-month extension.

3.2. New recruits hired during the three-month extension period shall be explicitly bound by the terms of collective labour agreements.

4. Extension of collective labour agreements

4.1. Reduction of the quantitative criterion from 50% to 40%, so that a collective labour agreement can be extended.

4.2. Recognition of the 40% fictio juris requirement, provided that the agreement is concluded or co-signed by the tertiary workers' organization (GSEE) and by one (1) of the national employers' organizations - in its fields of competence, and that this organization is the most representative one in this sector.

5. Organization for Mediation and Arbitration (OMED)

5.1. Provision for a fast mechanism to check the admissibility of applications for unilateral recourse to Mediation and Arbitration, by establishing and functioning a committee within the OMED, which will conduct "prechecks" on whether the conditions required by law are met. The Committee shall consist of one (1) Professor of Labour Law, one (1) Professor of Economics and one (1) supreme court judge, who shall be selected by the OMED Administrative Board for a specific term of office.

5.2. Abolition of the second instance arbitration by the OMED (article 412 of the Labour Code), with a view to rapidly resolving collective disputes.».

Based on the above Action Plan, point a) Within the first quarter of 2026: *Strengthening the regulatory framework for collective bargaining – Enactment of the Social*

Accord, on February 13, 2026, the Ministry of Labour and Social Security submitted to the Hellenic Parliament the relevant draft law, which was vote-approved, making the National Social Accord a law of the state. (Law 5278/2026 – Official Government Gazette 22A'/16-02-2026).

It should be noted that, as with the text of the Accord, the provisions of Law 5278/2026 were the result of consultation and agreement between the government and all national Social Partners.

d) *Please provide information on the measures taken or planned to guarantee the right to collective bargaining of (i) economically dependent (self-employed) persons showing some similar features to workers and (ii) self-employed workers.*

Paragraphs 1 and 2 of Article 394 of the Labour Code specify that the scope of the law covers all persons working under a private law employment relationship for any Greek or foreign employer, company, enterprise, or service in the private or public sector of the economy, including workers in agriculture, livestock farming, and related works, as well as domestic workers. In addition, it also applies to natural persons who, although not bound by an employment relationship, work under conditions of dependence and require protection equal to that of employees.

Therefore, its scope also covers the **category of economically dependent (self-employed) persons who share certain characteristics with employees under dependent employment relationships**, which includes workers on digital platforms. Article 133 of the Labour Code provides for the following:

«1. Service providers who are natural persons and are connected to digital platforms through independent service or work contracts have the right to establish organizations for the purpose of promoting their occupational interests.

2. Service providers who are natural persons and are connected to digital platforms through independent service or work contracts have the right to strike, which is exercised by the organizations referred to in paragraph 1. Articles 415 to 417 and article 419 apply mutatis mutandis.

3. The organizations referred to in paragraph 1 have the right to bargain collectively and conclude collective agreements, in accordance with paragraph 2 of Article 394.

Article 6§4 – collective action

a) *Please indicate:*
• the sectors in which the right to strike is prohibited;
• those sectors for which there are restrictions on the right to strike;
• sectors for which there is a requirement of a minimum service to be maintained.
Please give details about the relevant rules concerning the above and their application in practice, including relevant case law.

With regard to the **right to strike**, in accordance with the provisions of Article 415 of the Labour Code, strike is a right of workers exercised by the trade union organizations either as a means of preserving and promoting the economic, labour, trade union and social insurance interests of the workers, and as a manifestation of solidarity in relation to these objectives, or as a manifestation of solidarity on the part of workers of undertakings or establishments which are subsidiaries of multinational companies with workers in other undertakings or establishments or at the head office of the same multinational company, on condition that the outcome of the strike by the latter workers will directly affect the economic or labour interests of the former. In the second case, the strike shall be declared exclusively by the most representative tertiary trade union organization.

A minimum of twenty-four (24) hours' notice must be given to the employer or trade union before exercising the right to strike, including short-term work stoppages. The notice is given in written form, served by a court officer to the employer or employers concerned, and includes the date and time of commencement and duration of the strike, the form of the strike, the strike demands, and the grounds on which these are based.

It should be noted that for public undertakings or public utility undertakings[7] (paragraph 2, Article 415 of the Labour Code), the calling of a strike shall not take effect until four (4) full days have elapsed since the date on which the claims and the reasons for them have been announced by means of a document communicated by a court officer to the employer or employers, to the appropriate Ministry and to the Ministry of Labour and Social Security (Article 416). An additional obligation preceding the strike is the prior submission of a request for public dialogue before the Organization for Mediation and Arbitration (OMED), by the competent trade unions declaring the strike or the short-term work stoppage, in accordance with the provisions of Article 418 of the Labour Code. While the public debate is ongoing, the right to strike is suspended and legal action before the competent courts on issues related to the strike in question is prohibited.

Article 417 of the Labour Code provides for the obligation of the trade union organization declaring the strike to provide, during the strike, the necessary **Security Personnel** for the safety of the enterprise's premises and the prevention of damage and

[7] According to the provision, public utility companies whose operation is vital to meeting the basic needs of society are defined as companies or enterprises belonging to one of the following sectors: a) Provision of health services by hospitals in general, b) Water treatment and distribution, c) Production and distribution of electricity or fuel gas, d) Production or refining of crude oil, e) Transport of persons and goods by land, sea, and air, f) Telecommunications and postal services, g) Drainage and disposal of waste water and sewage, and collection and disposal of waste, h) Loading, unloading, and storage of goods in ports, i) Bank of Greece, Civil Aviation, and any kind of services or parts of services involved in the settlement and payment of salaries of public sector personnel pursuant to Article 14 of Law 4270/2014 (A' 143).

accidents. Furthermore, for public undertakings or public utility undertakings (Article 415, para.2), in addition to security personnel, **Personnel providing Minimum Level of Service** shall also be available to meet the basic needs of society during the strike. These basic needs are defined as at least one third (1/3) of the service normally provided. Therefore, the percentage of the Personnel Providing Minimum Level of Service to be agreed upon cannot be less than the above-mentioned rate (Ministry of Labour, Circular No. 62587/2021).

In particular, the trade union that has called the strike shall communicate in writing to the employer, by means of a document served by a court officer before the commencement of the strike, the names of the employees who will provide their services as Security Personnel and, if required, as Personnel Providing Minimum Level of Service. The personnel is designated upon a special agreement between the most representative trade union organization of the company or holding and the employer, through direct bargaining between the parties. The agreement is valid for the entire following calendar year and, if it is not terminated or amended, it is also valid for subsequent calendar years (Article 417, paragraphs 4-9).

In any case, a strike may not be declared without first determining the Security Personnel and, where required, the Personnel Providing Minimum Level of Service. At the same time, strike may not be declared unless the trade union that declares the strike is responsible for making sure that the personnel subject to the employer's managerial right (paragraph 10, Article 417) is made available to the employer.

Finally, Article 419, "Prohibition of hiring strikebreakers - prohibition of lockouts - legality of strikes," of the Labour Code stipulates the following:

"1. During a lawful strike, it is prohibited to hire strikebreakers.

2. Lockouts are prohibited.

3. It is not permissible to prohibit strikes by means of injunctions.

4. The Single-Member Court of First Instance of the district where the trade union that declared the strike is based shall decide for disputes arising from the application of Articles 415 to 417, as well as of this Article, in accordance with the procedure laid down in paragraph 3 of Article 614 and Articles 621 and 622 of the Code of Civil Procedure. In urgent cases, the presidents of the competent courts of first and second instance shall set a short trial date and shorten the deadlines for the service of judicial documents so that the hearing can take place within five days (5) from their filing, regardless of the number of cases pending. The deadline for appeal is three (3) days.

5. Disputes arising from the application of Article 9 in the event of a strike declaration in the undertaking, shall be settled in accordance with the procedure laid down in paragraph 4 and within the same time limits as above.

6. If a strike or work stoppage declared by a primary trade union organization is deemed illegal in accordance with the procedure set out in paragraph 4, no strike may be declared by the corresponding secondary or tertiary trade union organization against the same employer and at the same starting date after the court decision has been issued."

ARMED FORCES-POLICE

As regards the implementation of Article 6(4) of the Revised European Social Charter to the Armed Forces and the Hellenic Police, we refer to the previous report on Article 6, namely the 5th National Report on the Implementation of the Revised European Social Charter (2022).

***b**) Please indicate whether it is possible to prohibit a strike by seeking injunctive or other relief from the courts or other competent body (administrative body or arbitration body). If affirmative, please provide information on the scope and number of decisions in the last 12 months.*

According to paragraph 3 of Article 419 of the Labour Code: *"3. A strike may not be prohibited by injunctions."* The legality of the strike may be questioned, according to paragraph 4 of Article 419 of the Labour Code, only by bringing an action before the Single-Member Court of First Instance in accordance with the procedure for labour disputes (paragraph 3 of Article 614 and Articles 621 and 622 of the Code of Civil Procedure), while at the same time, specific short deadlines are set for the proceedings, as the hearing is scheduled within five days (5) since the filing of the action and the deadline for appeal is three (3) days. If the strike is deemed illegal or abusive, its suspension may be ordered.

Over the past 12 months, 38 lawsuits have been filed with the Athens Court of First Instance requesting the prohibition of strike action, of which 29 (74.4%) have been upheld and the strikes in question ruled illegal and abusive.

Article 20 - Right to equal opportunities between women and men

a) *Please provide information on the measures taken to promote greater participation of women in the labour market and to reduce gender segregation (horizontal and vertical). Please provide information/statistical data showing the impact of such measures and the progress achieved in terms of tackling gender segregation and improving women's participation in a wider range of jobs and occupations.*

As regards the enhancement of the legislative framework in order to achieve work-life balance for parents and carers:

By virtue of articles 227 to 233 para 2 of the Code of Labour Law (P.D. 62/2025, A' 121) our national legislation was adapted to the provisions of EU Directive 2019/1158 and new minimum common rights were established in the public and private sector in order to achieve work-life balance for parents and carers.

More specifically, in the context of the implementation of EU Directive 2019/1158:

- Fourteen days paternity leave with pay by the employer was established for birth, adoptive and foster fathers
- As regards the minimum 4 months parental leave (which is an individual right of every parent), which according to the previous framework was granted without pay, a parental leave benefit was established under the above-mentioned Directive, for two months, equal to the minimum statutory salary, together with proportion of Christmas and Easter bonuses and holiday allowance that are paid by DYPA (PES). In the event of twins, triplets and/or multiple babies, the allowance shall be paid for two additional months, irrespective of the number of children born together. Single parents, because of death of the other parent or total withdrawal of parental custody or due to non-acknowledgement of the child by the other parent, are entitled to double both the duration of parental leave and the amount of allowance. Moreover, persons exercising parental custody are also beneficiaries of such leave. The child's age limit increased from 6 to 8 years old. Workers were given the possibility to request parental leave in every flexible manner (for example in hours or in days) and employers have the responsibility to consider the request and respond to it, if it does not disturb the proper functioning of the enterprise.
- Up to five days' leave for carers per year without pay was established. Every worker who provides care or support to a relative or person residing in the same household with the worker or who needs care or support for serious medical reasons shall be the beneficiary, provided that the worker has completed six (6) months of employment with the same employer.
- The entitlement to absence from work with pay was established for the working parent or carer, up to two (2) times per year and up to one (1) workday each time, on grounds of *force majeure* relating to urgent family matters in case of sickness or accident that make the immediate presence of the worker necessary.
- The entitlement was established for every working parent or carer with children up the age of twelve (12), to request flexible working arrangements for the purpose of caring for the child, such as teleworking, flexible working hours or part-time employment,

provided that the worker has completed six (6) months of employment with the same employer. The employer must consider the request and reply in writing if he rejects the request by justifying the reasons for his rejection.

Furthermore, articles 227 to 233 para 2 of the Code of Labour Law regulated the following:

- New entitlements were established providing full equality of the rights of biological mothers with the rights of working women who adopt a child aged up to eight years old, and in particular: a) post-natal part of 9 weeks maternity leave starting from the child's integration date into the family and b) specific nine months maternity protection leave and benefit, granted by DYPA (PES).
- The entitlement for working women of the private sector was established to seven (7) working days paid leave every time they undergo medically assisted reproduction treatments.
- The entitlement to one (1) day paid leave per year was extended also to working women of the private sector for gynecological check-up (article 96 of Law 5043/2023).
- Many of the already existing provisions relating to maternity and facilitations to parents were reformulated and codified and in many of them significant improvements were carried out.

Below you can find the changes in summary:

- The entitlement to specific nine months maternity protection leave and benefit was extended also to workers of the public sector employed under fixed-term private law contract. The employer shall receive the benefit by the body she is employed with and bears her salary costs, in accordance with the minimum salary rate.
- The provisions on child-raising leave were codified (reduced working hours for parents after maternity leave or specific maternity protection leave or parental leave, with pay).
- The provisions on the following leaves were codified: leave to monitor a child's school performance, marriage leave, leave for prenatal checkups, reduced working hours for parents of children with disabilities, leave due to child's or other dependent member's sickness.
- The provisions on the following leaves were codified and improved: leave due to child's serious illness, leave due to the hospitalization of the child and leave to single-parent families.
- The termination by the employer of a working father's employment contract or relationship is explicitly prohibited and considered null and void for a period of six (6) months after childbirth, unless there are serious grounds for such termination, as is already the case for working pregnant/mothers (for 18 months).
- The termination of a worker's employment contract or relationship is prohibited on grounds of applying for or exercising their rights to improve work-life balance.

In any case the above-mentioned rights fall within the specific protection framework of articles 233 το 248 of the Labour Code, on safeguarding labour rights, and the framework against dismissal and any less favourable treatment.

Below you can find other legislative initiatives:

- Twenty (20) days paid leave was established in case of the death of a child for its working parents, without any condition.
- The terms «female worker who adopts a child» and «integration of the child into the family» were clarified in the law, so that these persons may exercise their rights to maternity leave and the specific maternity protection leave and benefit (article 43 of Law 4997/2022).
- The specific maternity protection leave and benefit increased from six to nine (9) months (during the leave the worker receives a benefit and enjoys social insurance coverage by DYPA (PES) depending on the minimum salary each time in force). Moreover, the possibility of a mother is established to transfer part of up to seven (7) months of the specific maternity protection leave/benefit to the father (article 43 of Law 4997/2022).
- The entitlement of maternity protection leave and benefit was extended to all insured women who have received maternity benefit by the social security fund they are insured with, whereas previously only those women who were insured with the former IKA-ETAM were entitled to this benefit. Moreover, this entitlement was extended also to lawyers who are employed on salaried assignment basis (article 150 του Ν. 5078/2023).
- Similarly, the entitlement to the specific maternity protection benefit was extended to freelance professionals, self-employed persons and farmers, provided that they have paid their social security contributions, and they also have the entitlement to transfer this provision respectively to the father (article 151 of Law 5078/2023).
- By virtue of articles 6 and 7 of Law 5089/2024 labour law was adjusted while provisions and facilitations referring to various types of leaves (maternity leave, paternity leave, specific maternity protection leave and benefit) and protection against dismissal were extended to same-sex spouses who have a biological child together.

The above measures were adopted firstly to bring a balance between private, professional and family life. However, in the long run the aim is to enhance the employment of women as clarified in the Regulatory Impact Analysis (RIA) that accompanied Law 4808/2021 when the Draft Bill was submitted to the Parliament for adoption, as follows:
«*The regulation aims at dealing with stereotypes in occupations and the roles of men and women and combating discrimination. This law establishes a minimum level of workers' protection, and in the medium term the objective is to foster female employment in order to tackle the under-representation of women in employment and support through legislation their carrier development by improving conditions so that they might combine responsibilities of their professional and private lives.*
Moreover, the general objective is the effective application of the principle of equality of men and women, as regards opportunities in the labour market and equal treatment at work, by improving access to regulations for work-life balance, such as leaves and flexible working arrangements for all and also through the creation of incentives, such as remuneration for entitlements that have been granted without pay till today and also strengthening the use of such entitlements by men, who usually do not make use of such facilitations.

Moreover, by providing equal protection against dismissal on family grounds, the question of removing disincentives or traditional stereotypes related to female employment is addressed. Furthermore, the national legislative framework is modernized on the rights and facilitations for working parents and persons with care responsibilities for relatives in the ascending line or other relatives or persons with whom they live in the same household, in the context of their private life, thus facilitating them in better combining their work with care giving tasks.
In the above-mentioned framework the acquired level of protection and rights are fully maintained on issues relating to work-life balance for parents and care givers, and at certain points they are further strengthened compared to the requirements of the Directive. Moreover, these rights are adapted to the current needs of both workers and enterprises by adopting flexible working arrangements that facilitate working parents to regulate their working time to meet their family needs.»

Finally, the recent Law No. 5239/2025 provides for other measures too in order to achieve work-life balance. More specifically, the following provisions are drawn up:

- Implementing working time arrangements without reducing earnings in accordance with the worker's family needs (for example, 10 hours on four-day working week instead of 8 hours on five-day working week) for a period of up to one year (article 9 of Law 5239/2025).
- Splitting the annual leave at the worker's will (article 10 of Law 5239/2025).
- Establishing the parental leave allowance as unseizable, non-transferable and tax-free amount (article 11 of Law 5239/2025).
- Extending maternity leave to foster mothers (article 12 of Law 5239/2025).
- Extending protection against dismissal to foster mothers (article 13 of Law 5239/2025).

General Secretariat of Equality and Human Rights

The promotion of women's equal participation in the labour market constituted one of the main priority axes of the National Action Plan for Gender Equality 2021–2025. In this context, a set of comprehensive measures has been implemented, aiming to address the various parameters that contribute to the creation and perpetuation of gender inequalities, as well as horizontal and vertical segregation, and to approach the different facets of gender equality in employment.
In particular:
Equality Label - Share Project
The Equality Label, established under Article 21 of Law 4604/2019 (as amended by Article 21 of Law 4808/2021), is awarded by the GSEHR to public and private sector enterprises that actively promote gender equality in the workplace. By recognizing organisations that adopt policies of equal treatment, equal opportunities, and the prevention and elimination of violence and harassment at work, the initiative serves as a concrete incentive for embedding equality principles into everyday business practices; thereby promoting, in a practical and effective manner, equal opportunities and equal treatment in the world of work.

The Equality Label seeks to address the complex mosaic of gender inequalities in employment and to promote sustainable change across the labour market. Its award criteria encompass a broad set of dimensions, including: eliminating pay gaps and ensuring equal remuneration for work of equal value; tackling horizontal and vertical gender segregation in employment; strengthening women's representation in managerial and decision-making roles; promoting equality in career progression; supporting work–life balance for parents and caregivers; encouraging the adoption of Gender Equality Plans by enterprises; and providing training programmes on gender equality, violence, and harassment.

The methodology for awarding the Equality Label to enterprises builds extensively on the knowledge and experience gained through the implementation of the pilot project *SHARE – Promoting work–life balance in companies and a better sharing of care between men and women*, co-funded by the European Commission's Rights, Equality and Citizenship (REC) Programme. Within this framework, a pilot version of the Equality Label was introduced and awarded to enterprises implementing gender equality policies, based on a structured methodology. A total of twenty-two enterprises applied, of which eighteen successfully received the pilot Equality Label.

Other initiatives - Promoting work-life balance

"Nannies of the Neighbourhood": This initiative supports parents and guardians—particularly women—in re-entering the labor market after childbirth and continuing their professional careers. It also addresses undeclared care work by certifying informal carers. The project subsidizes home-based care for infants and toddlers (2 months to 2.5 years old) through vouchers provided to working parents, single parents, and foster families, prioritizing mothers. The pilot phase of the programme was completed in July 2025, covering 62 municipalities, and its nationwide scale-up has been scheduled. During this phase, 1.515 care providers were registered, whereas 925 agreements were concluded between beneficiary parents and care providers.

Ensuring the right to equal pay for equal work or work of equal value

Greece is in the process of transposing *Directive (EU) 2023/970 on pay transparency, through the adoption of a law*. A *working group*, consisting of experts and representatives from the ministries and agencies involved, has been formed and is currently operating in order to draw up conclusions and draft law. The group's work is due to be concluded in December 2025.

The *FAIR PAY- Pioneering Equal and Transparent Pay Initiatives Project (2025-2026)* under the EU Citizenship, Equality, Rights and Values (CERV) programme, supports the implementation of the Pay Transparency Directive. Coordinated by the General Secretariat for Gender Equality and Human Rights in partnership with the Research Centre for Gender Equality, the Greek Association of Women Entrepreneurs, and NGO Women on Top (now renamed WHEN), the project introduces concrete measures to promote equal pay for equal work or work of equal value.

The main objectives of the Project are to promote pay transparency, develop practical tools for gender-neutral job evaluation, strengthen the capacity of employers and workers, and raise awareness of the benefits of equal pay, whereas their actions include the documentation of good practices, stakeholder consultations, the creation of practical tools and a training manual, educational seminars for employers and employees, awareness-raising campaigns, and the establishment of an online platform. A final conference will ensure broad dissemination of results.

By combining research, training, consultation, and awareness activities, *FAIR PAY* provides a structured pathway for measurable progress in narrowing the gender pay gap in Greece in line with EU requirements.

Addressing horizontal segregation

Strengthening the participation of women and girls in STEM fields is a key lever for combating horizontal occupational segregation. By challenging gender stereotypes and addressing structural barriers, targeted interventions contribute to diversifying the scientific and technological workforce and ensuring equal opportunities in career development.

To this end, the GSEHR has implemented a set of comprehensive actions. Specifically:

- Targeted initiatives facilitating the exchanges of expertise and knowledge-sharing between women academic and researchers and the creation of a support network. These activities supported the preparation and adoption of Gender Equality Plans (GEPs) in line with EU and EIGE standards.
- Participation in workshops and conferences promoted broader understanding and implementation of Gender Equality Plans across the academic and research community.
- Participation in the R&I Peers project (2018–2022): Conducted under the Horizon 2020 framework, the project piloted interventions designed to challenge gender bias and implicit norms restricting women's participation and advancement in research and innovation.

Addressing vertical segregation

Greece adopted Law 5178/2025 on gender-balanced representation in senior management positions of listed companies, non-listed public limited companies, and state-owned enterprises. The law transposes Directive (EU) 2022/2381 into national law and raises the quota for the underrepresented sex on the boards of large-listed companies to 33%.

Monitoring women's employment and gender-based discrimination at the workplace

The GSEHR monitors systematically women's employment and gender-based discrimination in the workplace has been significantly strengthened. The GSEHR's Gender Equality Observatory has issued nine thematic briefing notes by the Gender Equality Observatory covering a broad range of issues such as women's unemployment during the COVID-19 pandemic, organisation of work, occupational accidents and health risks, migrant women's employment, women with disabilities, the gender pay gap, skills by gender,

intergenerational transfer of socio-economic disadvantages, and pensions through a gender lens.

Also, extensive use of data from the Labour Inspectorate to track incidents of workplace violence and harassment has been made; four relevant reports published during 2021–2024 were integrated into the Secretariat's Annual Reports on Violence, enhancing evidence-based monitoring of gender-based discrimination in employment.

Furthermore, the Gender Equality Observatory systematically updated relevant indicators, ensuring both the timely provision of data and responsiveness to requests from institutions and citizens.

Facilitating the integration of unemployed women to the labour market

Within the framework of cooperation between the GSEHR and the Public Employment Service (DYPA), targeted actions have been implemented to support unemployed women, with particular emphasis on those belonging to vulnerable groups. Noteworthy initiatives include:

- *Employment Support for Women Victims of Gender-Based Violence*: This programme offers subsidised employment and entrepreneurship opportunities covering up to 90% of wages. It specifically targets survivors of gender-based violence, victims of trafficking, and transgender persons, aiming to facilitate their sustainable integration into the labour market.
- *Programmes to Support Female Employment (2021–2022):* These schemes provide grants and subsidies to women entrepreneurs and to mothers returning to the workforce, with a particular focus on young women and mothers with children under the age of eight who face heightened barriers to employment.

It must be noted that regarding recruitments for public sector bodies, the provisions of Law 4765/2021 shall apply, according to which objective criteria and procedure are set for the access of candidates to public sector jobs irrespective of sex.

Awareness raising

The awareness-raising actions implemented by the General Secretariat for Equality and Human Rights (GSEHR), with the aim of promoting equal opportunities and equal treatment in the fields of employment and work, can be schematically structured along two axes: according to the sector of employment (private or public) and the specific thematic areas addressed.

In particular:

With regard to the public sector, the National Centre for Public Administration and Local Government (EKDDA) has developed training programmes on gender-based violence (in cooperation with the General Secretariat for Equality and Human Rights – GSEHR). It is also already implementing a training programme on "Gender Perspective at the Workplace," which provides participants with a broad range of knowledge related to gender equality.

Moreover, the Research Centre for Gender Equality (KETHI) has implemented a project addressed to both employers and employees in the public and private sectors,

aiming to raise awareness on the issue of sexual harassment in the workplace. The project included five online training sessions (108 participants), five awareness and information events, one scientific conference, as well as the development of an e-learning training programme (469 participants).

As regards the private sector, the GSEHR has carried out a series of awareness-raising actions on gender discrimination in employment. These included, indicatively, five training programmes targeting business executives, the distribution of information materials specifically designed for employers and information leaflets for employees, as well as the organisation of awareness events.

In addition, in 2025 the "Diversity Awareness Project" has been implemented. The project, funded by the Recovery and Resilience Facility, aimed to raise employees' awareness of diversity issues and to combat discrimination in the workplace. Within its framework, an asynchronous online training and certification programme was delivered to 80,000 employees in the private sector. The training materials addressed grounds of discrimination such as gender, racial/ethnic origin, religion, disability, physical characteristics, age and sexual orientation, while also highlighting the dimension of intersectionality.

Greek Public Employment Service (DYPA)

The Greek Public Employment Service (DYPA) safeguards this right and promotes greater participation of women in the labour market and the reduction of gender segregation as follows:

Employment programmes targeting vulnerable social groups such as women

DYPA implements targeted active labour market policies aimed at enhancing women's participation in the labour market and reducing both horizontal and vertical gender segregation. These actions focus on creating new jobs, supporting female entrepreneurship, and empowering vulnerable groups of women.

In 2026 three new relevant schemes are in progress. More specifically:

- Funding scheme for enterprises to recruit 10.000 unemployed women, placing emphasis on mothers with children aged up to 15 years – 5.000 full-time employment positions and 5.000 part-time employment positions and
- Entrepreneurship scheme for 10.055 unemployed persons placing emphasis on women to establish their own company (17.000 euros per beneficiary).
- New entrepreneurship enhancement scheme for unemployed persons aged 18–29 years, placing emphasis on women, digital and green economy.

In 2025, a key funding initiative was launched to foster new entrepreneurial ventures. The "Entrepreneurship support programme for unemployed persons aged 30-59 with particular emphasis on women", offered up to €17,000 to support the creation of new businesses, again prioritizing female entrepreneurship. The programme strengthened self-employment opportunities, reduced entry barriers to entrepreneurship, and encouraged women's participation in sectors where female representation remains limited.

Furthermore, a new programme titled "Integrated Programme to Support New Entrepreneurship for Unemployed Youth Aged 18-29, with Emphasis on Women and the Digital & Green Economy" is scheduled for launching in September 2025 (total budget: €37 million). This programme aims to promote entrepreneurship by supporting the creation of 2,114 new small and medium-sized enterprises by unemployed youth who are Not in Employment, Education or Training (NEET). Special emphasis will be placed on unemployed women and on businesses operating in sectors of the digital and green economy. This nationwide programme offers each participant a grant of €17,500 (in 3 instalments over a 12-month implementation period starting from the date of business registration).

At the same time, the "Business subsidy programme for the employment of: a) 3,000 unemployed people from vulnerable social groups and b) 7,000 unemployed people facing labour market (re-)integration barriers", funded by the Recovery and Resilience Facility (RRF), is currently underway. This programme aims to create 3,000 new full-time jobs for unemployed individuals from special and vulnerable social groups – including women who are victims of gender-based or domestic violence – and an additional 7,000 positions for unemployed individuals facing integration barriers, such as mothers returning to the labour market after raising children, single-parent household members, and Roma individuals. The subsidy period ranges from 12 to 24 months, and the financial incentives offered to businesses enhance the sustainability of employment and increase the likelihood of long-term retention of women in the labour market.

Moreover, the "Business Subsidy Programme aimed at hiring 10,000 Unemployed Women, with Emphasis on Mothers of Minor Children" will be launched within 2025, offering full-time or part-time jobs ranging from 12 to 18 months.

Additionally, the "Open Comprehensive Programme for Counselling and Employment Subsidy for Unemployed Youth Aged 18-29" will create 5,971 new full-time jobs, providing increased subsidies (80% of the unit cost) to businesses hiring women. At the same time the "Programme for Labour Market (Re-) Integration of Unemployed Persons Aged 30+ from Vulnerable or Disadvantaged Social Groups" will be implemented, aiming to create 3,041 new jobs, 2,488 of which are specifically designated for women from vulnerable groups.

Finally, the "Open Comprehensive Programme for Counselling and Employment Subsidy for Unemployed Persons Aged 30+ and 50+" has been scheduled for 2026, with a total budget of €300 million. This programme provides higher subsidy rates for women (50% of the unit cost) to further strengthen their access to the labour market.

Vocational Training

In the framework of the National Recovery and Resilience Plan "Greece 2.0" and with funding from the European Union – NextGenerationEU, DYPA has been implementing large-scale upskilling and reskilling programmes in high demand sectors. Participation is open to all individuals aged 18+. According to the available statistical data, women account for more than 65% of the total participants. This outcome not only demonstrates the broad accessibility of the programmes but also highlights their positive contribution to promoting

gender equality in access to vocational training and lifelong learning opportunities, thereby effectively supporting the reduction of structural inequalities in the labour market.

As regards the enforcement of and compliance with the law on the promotion of the principle of equal treatment

By virtue of Ministerial Decision No. 67759/2022 (3795 B') the Labour Inspectorate started operating as an Independent Administrative Authority, responsible for monitoring and inspecting the enforcement of labour law, in continuation of the work done by the Labour Inspectorate.

According to article 103, para. 2, case e of Law 4808/2021 (101 A΄) the Labour Inspectorate shall inspect inter alia the enforcement of and compliance with the legislation on the promotion of the principle of equal treatment irrespective of sex, racial or ethnic origin, religion or belief, disability, age or chronic disease or sexual orientation, taking into account also cases of multiple discrimination, and also the fight against discrimination on the grounds of sex, gender identity and sexual orientation in the field of employment and occupation.

Moreover, by virtue of article 3, para. c of Law 4443/2016 (232 A΄) the principle of equal treatment irrespective of race, colour, national or ethnic origin, descent, religion or belief, disability or chronic disease, age, family or social status, sexual orientation, gender identity or characteristics in the field of employment and occupation, shall apply to all persons, in the public or private sector, as regards the working terms and conditions, especially as regards pay, dismissals, health and safety at work and in case of unemployment, the reintegration into the labour market and reemployment.

The Labour Inspectorate shall address cases of violation of the principle of equal treatment, either following complaints or following an order by the Ombudsman, who retains the power to conduct own inquiry and adopt final conclusion[8].

The violation of the principle of equal treatment of men and women regarding access to employment and occupation, including their career development and vocational training, together with education for employment, working terms and conditions, including pay and termination of employment, under article 20 of Law 4443/2016 (G.G. 232 A΄), is within the category of violations that are classified as «severe» and incur administrative sanction of 2.000€ per affected worker[9].

As regards statistics on women's participation in a wider range of jobs and occupations

Following at the end of the Chapter, you can find Tables from the Earnings Survey for the years 2018 and 2022, that present the number of workers by sex and position in the occupation, in accordance with the European classification of occupations ISCO_08 1-digit level. Moreover, the tables present the distribution of the percentage of managers by sex and occupation.

[8] See article 20, para. 5 of Law 4443/2016.

[9] Treated in accordance with M.D. No. 80016/01.09.2022 (4629 B') on «*Classification of Infringements and setting of fine amounts imposed by the Labour Inspectorate* ….».

The above-mentioned tables show that the total percentage of women in management positions in 2022 was 42,7% against 37,4% in 2018.

It must be noted that figures refer to enterprises with 10 or more workers and are active in sectors B to S, except O (public sector) of Nace Rev.2 classification, since this is the survey's coverage.

Slight differences between the totals and the sums of individual categories are due to rounding because of the use of normalization coefficients for the calculation of results on the number of workers.

b) *Please provide information on:*

• measures designed to promote an effective parity in the representation of women and men in decision-making positions in both the public and private sectors;

• the implementation of those measures;

• progress achieved in terms of ensuring effective parity in the representation of women and men in decision-making positions in both the public and private sectors.

Article 6, para.1 of Law 2839/2000, stipulates the following: «1. a) In every staff council in public services, public law legal entities and local self-government agencies, the number of members of every sex appointed by the administration shall be equal to at least one third of the persons appointed, in accordance with the provisions in force, provided that in the service in question there is sufficient number of civil servants who meet the legal requirements for appointment and that the members appointed are more than one (1). Decimal figures shall be rounded up to the next whole number, if the fraction is equal to half the number or more.

b) In case the members of administration councils or of other collective management bodies of public law legal entities or private law legal entities are appointed or nominated by the Public Authority, Public Law Legal Entities and Local Self-Government Agencies, the number of persons of each sex appointed or nominated is equal to at least one third of the appointed or nominated persons, according to the provisions in force, on condition that the members appointed or nominated are more than one (1). Decimal figures shall be rounded up to the next whole number, if the fraction is equal to half the number or more. The provisions of subparagraphs (a) and (b)shall apply to staff councils, administrative councils and collective bodies established after the entry into force of this law. «Establishment of collective bodies referred to in cases (a) and (b) without compliance with the conditions of the present article is not legal, except for collective bodies the members of which partly or in total are appointed ex officio or are elected or are appointed by the Ministry of Defense and the legal entities supervised by the Ministry, due to proven insufficiency of appropriate number of persons of the other sex».

Article 161 of the Civil Servants Code (Law 3528/2007, as in force), on «Representation of sexes» stipulates that «In Staff Councils established under the provisions of articles 157, 158, 159 and160 the number of members of each sex appointed shall be equal at least to 1/3 of the total number of the council's members, provided that in the service in question there is sufficient number of civil servants who meet the legal requirements for appointment and that the members appointed are more than one (1).

Decimal figures shall be rounded up to the next whole number, if the fraction is equal to half the number or more».

According to the relevant Circular[10], the General Secretariat for Equality and Human Rights (former General Secretariat for Gender Equality), being the body competent for planning and supporting policies on gender equality in the country, provided clarifications and guidelines on the application of the above-mentioned provisions. Moreover, the competent bodies and Authorities were informed on the "Development of an application, application of laws on the quota of sexes in public administration bodies and bodies supervised by them", which is included in the Flag Project: "Organisation of services for the incorporation, monitoring and assessment of equality policies at all forms of public action" ("Observatory"). This is an application that guides Administration Bodies on how to form and register the established or under establishment bodies facilitating thus both the respect of quotas and their monitoring by the General Secretariat for Gender Equality (http://pososto si.isotita.gr).

Regarding the participation of women on the boards of directors of the largest listed companies

According to data from the Hellenic Capital Market Commission, in 2023 women accounted for 27.5% of the members of boards of listed companies, marking an upward trend (2022: 26.1%, 2021: 25%). This development likely reflects the impact of Law 4706/2020 on corporate governance of public limited companies, which introduced a requirement that no less than 25% of the total board members must belong to the underrepresented sex as part of the suitability criteria for board appointments.

Law 5178/2025, which transposed Directive (EU) 2022/2381 on gender balance on corporate boards into national law, raised the quota to 33% for large listed companies. It also requires these companies to prepare annual reports on gender-balanced representation, to be submitted by 30 September each year to the Hellenic Capital Market Commission, the General Secretariat for Gender Equality and Human Rights, and the Greek Ombudsman.

[10] By virtue of Circular No. ΔΙΔΑΔ/Φ.37Α.1/13/οικ.12383/6-4-2017 on «Application and monitoring of the participation of sexes in collective bodies of the administration. Registration of collective bodies of institutions in the electronic application for monitoring»

Regarding management positions in public institutions:
Below you can find data on the participation of women who are appointed as heads of General Directorates and Directorates in the public sector in absolute figures and in percentages:

Participation by sex in management positions in the public sector			
Management positions	**WOMEN**	**MEN**	**Grand Total**
Heads of General Directorates	158	142	300
	53%	47%	100%
Heads of Directorates	2.740	1.882	4.622
	59%	41%	100%
Grand Total	2.898	2.024	4.922

Data refers to personnel appointed as Heads of General Directorates and Directorates in Ministries and public services, public law legal entities, Local Self-Government Agencies, Decentralized Authorities and Independent Authorities during July 2025. Data are taken from the Public Sector Human Resources Registry.