

GRECOTEL

POLICY

ON PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK

&

ON THE MANAGEMENT OF INTERNAL COMPLAINTS CONCERNING INCIDENTS OF VIOLENCE AND HARASSMENT

Preamble

The company shall comply with all measures and obligations relating to the application of the provisions of Part II of Law No, 4808/2021 on preventing and combating all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

The aim of this policy is to create and establish a working environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from any violence and harassment. It also aims to create, maintain and promote a climate of high-quality human relations, mutual trust and good cooperation, mutual respect between persons associated with the company, as well as compliance with the necessary rules of conduct, hierarchy, ethics, safety and comfort in the provision of services and work.

The Company states that it recognizes and respects the right of every employee to enjoy a work environment free of violence and harassment and will not tolerate any such behaviour, in any form, by any person. In particular, the company will not tolerate any form of harassment, intimidation, psychological workplace abuse, aggressive or unjustified behaviour, offensive, harassing and generally unwanted behaviour against any employee or other person protected by this policy, on the part of a supervisor, co-worker and/or third party, and any employee or co-worker who may be the recipient or witness to such incidents shall immediately report such incidents to the persons designated in the policy. The Company's Management provides the assurance that these matters will be handled with discretion, confidentiality and efficiency.

This policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulatory legislation implementing such Law and includes the persons referred to in Article 3(1) of Law No. 4808/2021, as specified below.

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Scope of application

The persons covered and protected by this policy are all employees and employed persons of the company, regardless of their contractual status. Specifically, it covers any employee with an agreement or employment relationship, whether full-time, part-time, rotational, permanent or fixed-term, as well as those employed under a work contract, independent services, paid mandates, those employed through third-party service providers, persons undergoing training, including trainees and apprentices, volunteers, as well as employees whose employment relationship has ended, and persons applying for work.

Employees with agreements or employment relationships through temporary employment agencies (TEAs) are included in the protection that the company, as an indirect employer, provides to its employees/partners, but also in its obligations to take measures in case of violation of the prohibition of violence and harassment at work by a temporary employee of the company, given that the managerial right is exercised by the company.

However, in case of violation of the prohibition of any form of violence and harassment by a temporary employee, the company forwards the relevant file also to the direct employer (TEA), as the exercise of disciplinary power remains with the direct employer, is governed by its own framework and is not transferred by the agreement of assignment to the indirect employer.

Employees assigned to the company under an assignment agreement and with their written agreement are included in the protection provided by the company, as a third party employer, to its employees/partners, but also in its obligations to take measures in case of violation of the prohibition of violence and harassment at work by a loaned employee in the company, since the managerial right is exercised by the company.

However, in the event of a breach of the prohibition of all forms of violence and harassment by a borrowed employee, the company will also forward the relevant file to the original employer, as the exercise of disciplinary power remains with the original employer and is governed by its own framework.

For the purposes of implementing this policy, forms of violence and harassment against the above-mentioned persons may take place in particular:

(a) at the workplace, including public and private places and places where the employee performs work, receives pay, takes a break, in particular, for rest or eating, in personal hygiene and care facilities, changing rooms or accommodation provided by the company,

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(b) travel to and from work, other travel, movements, education, and work-related events and social activities; and

(c) in work-related communications, including those carried out through information and communication technologies.

Definitions and examples

“Violence and harassment” means any form of conduct, acts, practices or threats thereof, whether occurring once or repeatedly, which is intended to, does or is likely to result in physical, psychological, sexual or economic harm.

"Harassment" means any form of conduct which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, dehumanising or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment on the grounds of sex or other grounds of discrimination.

"Gender-based harassment" means any form of conduct related to the gender of a person, which has the purpose or effect of violating the dignity of that person and creating an intimidating, hostile, degrading, humiliating or aggressive environment as defined in Article 2 of Law No. 3896/2010 (A' 107) and Article 2(2) of Law No. 4443/2016. These forms of conduct include the sexual harassment of Law 3896/2010, as well as forms of conduct related to a person's sexual orientation, expression, identity or gender characteristics.

"Sexual harassment" means any form of unwanted verbal, psychological or physical conduct of a sexual nature which violates the dignity of the person.

- It may take the form of unwanted touching, offensive and/or sexual comments, coercion, use of force/power or include unwanted sexual advances, unwanted sexual intercourse, unwanted verbal or physical conduct of a sexual nature, unwanted invitations for sexual compliments and other unwanted physical, verbal or visual conduct of a sexual nature and/or conduct directed at someone because of his/her gender.
- Unwanted physical, verbal or visual conduct of a sexual nature may include, but is not limited to, any of the following types of conduct: explicit sexual suggestions, sexual innuendo, comments, adjectives, or defamatory expressions with sexual innuendo, "teasing" or "jokes" of a sexual nature, jokes of a sexual nature, obscene gestures, or obscene expressions, pictures or drawings with obscene or sexual innuendos, display of sexually offensive graphic materials that are not necessary for the job, physical contact, such as "light hitting", pinching, or touching.

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Harassment on any basis takes place whenever, for example, the following occur:

- submission to harassing conduct that is an express or implied term or condition of employment,
- submission to or rejection of conduct is used as the basis for an actual or implied decision regarding employment, including loss of employment, demotion, or change in responsibilities or benefits,
- the conduct's aim or effect is not reasonably interfering with an individual's work performance or creates an intimidating, hostile or offensive work environment.

Other unlawful harassment is any conduct that creates a work environment characterized by offensive, obscene or derogatory comments and includes, but is not limited to:

- racist or derogatory comments based on ethnicity,
- downloading, posting, uploading, displaying, publishing, photographing, printing, distributing pornographic, obscene, offensive or inappropriate material or material of a sexual, ethnic, religious or racist nature,
- use of offensive humour, including racist, ethnic, religious or sexist jokes,
- derogatory comments concerning another person's gender, race, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or any other legally protected characteristic of another person,
- any communication or act that is harassing or discriminatory.

Prohibition of all forms of violence and harassment

All forms of violence and harassment, whether related to or arising from work, including gender-based violence and harassment and sexual harassment, are expressly prohibited.

The company is committed to providing a working environment free of discrimination, intimidation and unlawful harassment. Harassment is a form of discrimination that is offensive, affects the performance of employees/partners, compromises the integrity of the company's relationship with its employees/partners and harms the productivity and stability of the company.

In particular, harassment on the basis of gender, race, nationality, ethnicity, national origin, age, disability, religion, sexual orientation, gender identity or expression, or any other legally protected characteristic will not be tolerated and is prohibited by this policy.

Diversity and inclusion

The company develops and maintains a diverse workforce that provides a consistent competitive advantage. It recognises that a diverse mix of backgrounds, skills and experiences leads to new ideas, products and services. This maximises the company's ability to achieve its objectives.

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Non-discrimination

The company is committed to providing equal employment opportunities and does not accept any form of unfair discrimination at any stage of the employment relationship, including but not limited to recruitment, hiring, training, payroll and promotions.

In this context, any form of direct or indirect discrimination based on sex, race, ethnicity, nationality, national origin, age, disability, religion, sexual orientation, gender identity or expression or any other legally protected characteristic, is prohibited.

In particular, discrimination in terms of remuneration is prohibited. All employees of the company are entitled to equal remuneration for equal work or work of equal value. The company guarantees that the job classification system for determining remuneration is based on common criteria for all employees and is enforced in a non-discriminatory manner.

In the design and implementation of personnel evaluation systems linked to their salary progression, the company guarantees that the principle of equal treatment is respected and no discrimination of any kind is allowed.

Promoting substantive equality at work

The company promotes substantive equality at work to ensure: equal pay for work of equal value, balanced participation of women and men in managerial positions or in professional and scientific teams set up in the undertaking, equality in professional development, compliance with labour legislation on maternity protection and parental leave, compliance with legislation on measures to prevent and combat violence and harassment, implementation of equality plans or other innovative measures to promote effective gender equality, and establishment of a corporate culture of equal opportunities for women and men. To this end, it cooperates with the General Secretariat for Demographic and Family Policy and Gender Equality and adopts international best practices.

I. PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK

Assessment of violence and harassment risk at work

The company recognizes that any harassment that leads to the creation of an intimidating, hostile and offensive environment, very often occurs in workplaces and has strong and negative consequences, especially for the individuals who are the direct recipients of the harassment, but also for individuals indirectly involved in relevant incidents (e.g. persons who are witnesses).

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It also recognises that violence and harassment at work increase work-related stress and lead to psychosocial risks. Psychosocial risks and occupational stress are among the biggest challenges in the field of occupational safety and health. They significantly affect the health of individuals and the proper functioning of businesses.

The company recognises that psychosocial risks arise from problematic work design, organisation and management, as well as from an unhealthy social context of work and may lead to negative psychological, physical and social outcomes such as work-related stress, burnout or depression. When psychosocial risks and stress are treated as an organisational issue rather than a personal weakness, they can be as manageable as any other risk to safety and health in the workplace.

In view of the above, the company assesses and investigates the risks of violence and harassment at work, on a regular basis, in order to prevent any incident of violence and harassment.

To this end, the company, in cooperation with the occupational physician, updates the Occupational Risk Assessment Study to include the assessment of psychosocial risks, especially the risks of violence and harassment, including sexual harassment, in order to take the appropriate measures for their prevention, control and mitigation. For the preparation of a programme of preventive action and improvement of working conditions in the company, psychosocial risks are taken into account as a distinct parameter. In this context, the occupational physician may collaborate with occupational psychologists to prepare a Psychosocial Risk Assessment Study, as an integral part of the Occupational Risk Assessment Study.

The Psychosocial Risk Assessment identifies the risks associated with violence and harassment, taking into account, among other things, any inherent risks arising from the nature of the activity, the workplace, factors such as gender and age or other discriminatory characteristics, as well as risks related to specific groups of employees (such as night workers, new recruits).

Measures to prevent, control, limit and respond to incidents of violence and harassment at work and to monitor such incidents or forms of behaviour

The company adopts the following measures and is committed to implementing the following management practices to prevent and control the risks of violence and harassment:

- It encourages all its employees/partners to maintain a working climate where respect for human dignity, cooperation and mutual assistance are core values.
- It ensures open communication with management and immediate supervisors and colleagues.

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- It establishes a specific procedure for handling reports/complaints, as specified in the relevant chapter of this policy.
- It receives, investigates and handles any complaint or related report, demonstrating zero tolerance for violence and harassment, in a confidential manner and in a way that respects human dignity. It follows every procedure laid down, respecting the principle of confidentiality and the protection of the personal data of the parties involved.
- It ensures the smooth receipt, investigation and management of such complaints or reports.
- It provides assistance and access to any competent public, administrative or judicial authority in the investigation of such incidents or conduct, if requested by them.
- It ensures that employees have the necessary training/information to carry out their duties, particularly in jobs that are at higher risk of violence and harassment incidents.
- It takes technical measures, such as installation of emergency alarms, improved lighting, etc., as specified in the Occupational Risk Assessment Study.
- It organises actions to raise awareness among employees on healthy behavioural patterns, as well as on issues concerning vulnerable categories of employees.
- It guides and supports victims of violence and harassment, as well as victims of domestic violence, to reintegrate into the workplace, by any appropriate means or reasonable accommodation.
- It ensures that employees are trained in violence management procedures.
- It supervises the proper implementation of health and safety measures for employees.
- It develops a programme of preventive action and improvement of working conditions in the company, taking into account, in particular, the organisation of work, social relations, environmental and technological factors, as well as psychosocial risks.
- It assesses psychosocial risks, including the risks of violence and harassment, including sexual harassment, and take appropriate measures to prevent, control and limit them.
- It evaluates on a regular basis the effectiveness of the preventive and countermeasures in place and reviews/updates the risk assessment and measures.

Furthermore, the company is strengthening the responsibilities of the occupational physician, who:

- Advises on occupational physiology and psychology, including the prevention of violence and harassment at work, including sexual harassment, ergonomics and occupational hygiene, the arrangement and configuration of workplaces and the work environment, and the organisation of the production process.

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- Advises on initial placement and job changes for health, physical or mental health reasons, temporarily or permanently, as well as on the integration or reintegration of discriminated persons or victims of violence and harassment, including sexual harassment, and victims of domestic violence in the production process, including by suggesting job restructuring or reasonable adjustments.
- Provides emergency treatment, especially in the event of an incident of violence or harassment.

Information and awareness-raising activities for personnel:

The company declares its zero tolerance of violence and harassment and adopts the following categories of actions to raise awareness of these phenomena among its personnel.

In particular, the company is committed to providing personnel with information in accessible formats, as appropriate, on the risks of violence and harassment, as well as on the related prevention and protection measures, on the procedures in place at company level and on the possibilities provided by law in the event of such incidents.

The company and the persons exercising the managerial right or representing it:

- Provide employees with information on the potential risks of violence and harassment in the workplace and on the relevant prevention and protection measures, including the obligations and rights of the employees and the employer in such incidents.
- Post in the workplace and make accessible information on the procedures that exist at company level for reporting and dealing with such forms of behaviour, as well as the contact details for the competent administrative and judicial authorities in accordance with the applicable provisions

In the context of personnel awareness, the company, among others:

- Organises targeted personnel meetings to discuss relevant issues and address potential risks in a timely manner.
- Holds seminars with mental health specialists or counselling service providers, representatives of voluntary organisations, etc.
- Encourages the participation of employee representatives and management in training programmes and seminars on the identification and management of risks of violence and harassment at work.

In the context of raising awareness of health and safety issues at work:

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- The company ensures that employees receive all necessary information regarding safety and health risks, as well as measures and activities for protection and prevention, whether in the company in general or in any type of workplace and duties, including risks and measures to combat violence and harassment at work, including sexual harassment.
- The occupational doctor shall inform workers of the risks arising from their work and of ways of preventing them, including the risks of violence and harassment, including sexual harassment.

Rights and obligations of affected employees/partners

Any employee/partner of the company who is affected by an incident of violence and harassment against him/her, even if the relationship in the context of which the incident or conduct allegedly occurred against him/her has ended, has the following rights:

- Right to judicial protection.
- Filing a complaint, a grievance and a request for a labour dispute settlement with the Labour Inspectorate, within the scope of its statutory powers.
- Reporting to the Ombudsman, within the framework of his statutory powers, as a body promoting and supervising the principle of equal treatment.
- Reporting within the company in accordance with this policy. In any case, where such conduct is reported within the undertaking, the person concerned shall retain all rights of recourse to any competent authority.

Any affected person may also address:

- The Labour Inspectorate, via the 1555 citizens' helpline.
- The service of direct psychological support and counselling for women victims of gender violence, through the SOS 15900 Helpline.

Any person who suffers an incident of violence and harassment has the right to leave the workplace for a reasonable period of time, without loss of pay or other adverse consequence, if in his or her reasonable belief there is an imminent serious risk to his or her life, health or safety, and until measures are taken which are sufficient to stop the violent and harassing behaviour.

In this case, the departing employee must inform the company in advance in writing, stating the incident of violence and harassment and the circumstances that justify his/her belief that a serious risk is posed to his/her life, health or safety. If the risk does not exist or has ceased to exist and the person refuses to return to the workplace, the company can appeal to the Labour Inspectorate to settle the dispute.

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In any case, the violation of the prohibition of violence and harassment at work gives rise, among other things, to a claim for full compensation of the person affected, which covers his/her positive and consequential damage, as well as moral damage.

Furthermore, the termination in any way of the legal relationship on which the employment is based, as well as any other unfavourable treatment of the affected person, is prohibited and invalid, if it constitutes retaliatory behaviour or a countermeasure for the denunciation of an incident of violence and harassment.

Where legal persons and associations of persons, including trade unions, have a legitimate interest and the written consent of the person concerned, they may bring proceedings in his/her name before the competent administrative or judicial authorities. They may also intervene in his/her defence before the administrative or judicial authorities. The person concerned may in any case intervene or even annul the procedure.

It should be noted that where the affected person alleges violence and harassment and invokes, before a court or other competent authority, facts or evidence from which it is believed that an incident of violence or harassment occurred, the complainant bears the burden of proving to the court or other competent authority that there was no violation. This rule does not apply to criminal proceedings.

Obligations of the company and its competent bodies in the event of an incident of violence and harassment occurring or being reported or denounced

The company and the persons exercising managerial authority or representing the company, to the extent of their own responsibility, are obliged to initiate the prescribed procedure for managing and responding to incidents of violence and harassment as soon as they become aware of any incident, without undue delay, as provided for in the relevant chapter of this policy.

When an employee or other employee violates the prohibition of violence and harassment, the company is obliged to take the necessary appropriate and proportionate measures on a case-by-case basis against the complainant, as set out in the relevant section of this policy, in order to prevent a similar incident or behaviour from recurring.

Definition of reference person

The company's Human Resources Manager is designated as the reference person ("liaison") at company level, who is responsible for guiding and informing employees/partners on the prevention and response to violence and harassment at work.

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The role of the reference person is informative: it includes guiding and informing employees/partners, whether or not they address him/her in response to an incident or complaint of violence and harassment. Employees will have easy and immediate access to the reference person and in particular will contact him/her via the e-mail address Anna.Sfakianou@grecotel.com and the telephone line 2831071102

In any case, the above person is obliged to ensure the protection of Personal Data that may come to his/her knowledge in discharging his/her role.

Employment protection and support for employees/partners who are victims of domestic violence

Demonstrating in practice its social responsibility towards domestic violence, the company adopts the following measures:

- Protection of employment of victims of domestic violence by any appropriate means or reasonable accommodation.
- Provision of special leave or flexible working arrangements at the request of the employee/partner, a victim of domestic violence, in order to support him/her in maintaining employment and his/her smooth reintegration after such incidents, especially where there are minor children or children with disabilities or serious illnesses.

II. PROCEDURE FOR RECEIVING AND EXAMINING COMPLAINTS

The Company shall establish a specific procedure regarding the stages of reporting issues of protection from harassment and violence. This procedure reflects the immediate measures to be taken in case of protection issues. Within this framework a specific complaint-reporting mechanism shall be established to identify and report problems and breaches of the relevant legislation, ensuring: a) immediate communication and access to the person responsible for receiving the report and b) appropriate support and legal assistance when needed.

General principles

Complaints, reports and allegations of harassment or violence are handled promptly, seriously and in absolute confidentiality. All employees have a duty of full confidentiality if they provide evidence as part of a complaint investigation.

Commenting on confidential information and/or spreading rumours shall not be tolerated. All employees are protected from victimisation, unfavourable treatment and adverse change of

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circumstances because they have contributed in any way (e.g. reporting, testifying) to the investigation of a complaint of violence, harassment or sexual harassment.

Communication channels - Contact persons

The company ensures secure and easily accessible communication channels for receiving complaints. The company's Human Resources Department is designated as the competent department that will receive, examine and handle complaints or grievances of the affected persons regarding behaviours of violence or harassment.

In particular, affected persons can address any issue of violation of the prohibition of violence and harassment at work to the contact person ("liaison") at company level, i.e. the Human Resources Manager, through the e-mail address Anna.Sfakianou@grecotel.com and the telephone number 2831071102

As jointly responsible persons for the reception, management and examination of the above complaints are designated the other executives of the Human Resources Department with whom the affected persons will communicate via the e-mail address Markos.Motakis@grecotel.com and the telephone number 2831071102

The executives of the Human Resources Department perform the duties of receiving, managing and examining the above complaints, in parallel with their job duties.

For the avoidance of any doubt, the above contact persons must inform the affected person of his/her ability, at any stage of the procedure followed within the company, to also submit a complaint to the competent administrative authorities within their competence (Labour Inspectorate and Ombudsman) and to the judicial authorities, at his/her discretion.

Main persons involved in the procedure - specifically authorised personnel

- The affected person making a complaint/report/grievance.
- The company's HR Head, acting as a "liaison" at the company level.
- The executives of the Human Resources Department as jointly competent for receiving and handling the relevant complaints/reports/grievances.
- The immediate superior of the person making the report (if the person concerned so chooses).
- The legal representative of the company.

Reception of Complaints / Reports / Grievances

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Complaints/reports/grievances of acts of violence or harassment or retaliation that constitute a violation of this policy will be accepted in writing or verbally, through the above channels of communication. Even anonymous complaints will be taken seriously and investigated.

Any employee/partner who observes an incident of violence, sexual harassment or other illegal harassment must immediately report it to the aforementioned contact persons.

Any supervisor or Director who observes an incident of violence or possible sexual or other illegal harassment must immediately inform the company's "liaison".

Any affected person has the right to submit complaints/reports/grievances to his/her immediate superior. If the complaints are directed against his/her immediate superior, the affected person may address the complaints to the immediately following supervisors. However, given that issues of violence or harassment or sexual harassment are assessed as extremely serious, the affected person may bypass the hierarchy and report directly to the company's "liaison" or any member of the Human Resources Department. Therefore, although it is recommended that affected persons seek assistance from their immediate supervisor first, they can, at any time, report their concerns to any reporting channel.

The affected person is entitled, after contacting the above channels of communication, if he/she is not satisfied with the management of the issue and the solution provided, to submit complaints/reports/grievances directly to the Company's Management.

Investigation and examination of complaints impartially and protection of the confidentiality and personal data of victims and complainants

The Human Resources Department and any competent person of the company are committed to receive and not to prevent the receipt, to investigate and manage promptly any such complaint, to investigate and examine the complaints with impartiality and respect for human dignity, as well as to take immediate measures to protect the affected person.

In any case, the above persons or services are committed to maintain confidentiality and protect Personal Data collected in the performance of the above tasks

All complaints/reports/grievances will be investigated quickly and thoroughly by the company's "liaison" or other contact persons, who are in charge of investigating such complaints/reports/grievances.

The above contact persons shall have access to the records of the undertaking, to audiovisual material collected by the undertaking, and to other appropriate means for the collection of information

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and data in the examination of the complaint and for the identification of the complainants. In any case, appropriate organisational measures shall be taken to ensure the security of the above information and to safeguard confidentiality.

Respect for the principles of confidentiality and protection of personal data is essential. A secure information exchange procedure is followed between the employees/stakeholders involved. Data protection and confidentiality covers all work and investigations carried out under this policy and continues after its completion. The applicable legislation on the protection of privacy and personal data is strictly observed.

Main complaint-handling procedure

Phase 1/ Starting the investigation of the complaint: When the contact persons receive a complaint of an incident of violence or harassment or sexual harassment, they shall follow the following procedure:

- Record the date, time and events of the incident.
- Ascertain the views of the affected person.
- Confirm that the affected person understands the company's procedures for handling the complaint.
- Discuss and agree with the affected person on the next steps in investigating the complaint.
- Respect the choice of the affected person.
- Maintain a confidential record of all discussions.
- Maintain confidentiality and protect personal data.
- Inform the affected person of his/her ability, at any stage of the procedure followed within the company, to also submit a complaint to the competent administrative authorities within their competence (Labour Inspectorate and Ombudsman) and to the judicial authorities, at his/her discretion.
- Provide immediate attention and support to the affected person. If medical and psychological assessment and support is needed, it should be provided immediately. Inform the occupational physician to provide emergency treatment.

Phase 2/ Communication with the persons involved and examination of evidence: Subsequently, the competent persons conducting the investigation discuss with the persons involved and examine the relevant evidence. The investigation of the incident is being conducted with confidentiality and objectivity. In particular:

- They discuss separately with the affected person and the reported person.

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- They discuss separately with other relevant third parties (e.g. witnesses to an incident of violence or harassment).
- They examine audiovisual material, e-mails, documents and any other relevant evidence to examine the complaint and to establish the identity of the reported persons.

Phase 3/ Assessment and decision-making: The competent persons conducting the investigation shall, on the basis of the above information, decide on the merits of the complaint. In this context, they must try to understand what has happened and establish the facts in as objective, impartial and direct a manner as possible.

Following the above assessment, they prepare an investigation report on the complaint, detailing the investigations, testimonies and findings, and recording the findings of the investigation.

The relevant conclusion, accompanied by the corresponding proposals for further action by the company, is submitted to the company's legal representative.

The legal representative, in cooperation with the company's "liaison" and the relevant competent person who conducted the investigation, takes the decision on the company's action plan (this may include, as appropriate, further actions to protect in a safe and appropriate manner, a complaint to the local authorities, initiation of disciplinary proceedings, etc.).

In particular:

(a) If the investigation carried out does not establish the validity of the complaint, the case shall be closed. Nevertheless, organisational measures can be taken at company level to ensure the smooth operation of the company and to achieve working peace. The affected person is again informed of his/her ability to submit a complaint to the competent administrative authorities within their competence (Labour Inspectorate and Ombudsman) and to the judicial authorities, at his/her choice.

(b) If the investigation carried out establishes the validity of the complaint, i.e. that the alleged incident of violence or harassment or sexual harassment took place, the procedure provided for in this policy shall be followed with regard to the harasser and appropriate organisational measures shall be taken to protect the affected person. The company monitors that the recommendations and general measures taken are implemented, that the harassing behaviour has stopped and that the affected person is satisfied with the outcome. In this case too, the affected person is again informed of his/her ability to submit a complaint to the competent administrative authorities within their competence (Labour Inspectorate and Ombudsman) and to the judicial authorities, at his/her choice.

The company keeps a confidential record of all actions taken to handle each case, assures the parties involved that all records relating to the matter are kept confidential and ensures that the

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procedure is completed as quickly as possible and in any case within a reasonable time after the complaint is made.

Report to the competent authorities

In the event of particularly serious reports or complaints, the legal representative, in cooperation with the company's "liaison", may decide to submit a report to the competent administrative authorities, seeking their advice. The company undertakes to follow the advice and implement the measures proposed by the above-mentioned administrative authorities. Depending on the case, court proceedings and/or other possible legal procedures may be initiated.

Prohibition of retaliation against the affected person

In any case, the company is committed to complying with the obligation of non-retaliation, in accordance with article 13 of Law No. 4808/2021 and the provisions of labour legislation in force from time to time.

Specifically, the termination in any way of the legal relationship on which the employment is based, as well as any other unfavourable treatment of the affected person, is prohibited and invalid, if it constitutes vindictive behaviour or a countermeasure within the meaning of article 14 of Law No. 3896/2010, for an incident of violence and harassment.

Consequences of finding infringements

When the investigation reveals that an employee or other employee has violated the prohibition of violence and harassment, the company will take the necessary, appropriate and proportionate measures, as the case may be, against the complainant, in order to prevent and avoid a similar incident or behaviour from recurring. These measures may include:

(a) The recommendation of compliance, change of position, working hours, place or manner of employment of the reported person.

(b) The initiation of disciplinary proceedings and the imposition of the disciplinary sanctions provided for by the company's Internal Labour Regulation, if the reported person falls within the scope of the latter. Specifically, for violations of this policy, one of the following disciplinary sanctions is imposed by the company's Management, through its designated bodies, depending on the severity of the offence:

- Oral or written observation.
- Reprimand.

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- A fine of up to 25% of the daily wage or 1/25 of the salary. Fines withheld from employees shall be deposited where the law requires.
- Compulsory absence from work up to a maximum of ten days per calendar year for the same employee. During this period of absence, the employment agreement shall be suspended and not terminated. An appeal against the penalty of compulsory absence from work may be lodged within five days of the service thereof to the employee before the competent Regulations Department of the Ministry of Labour, pursuant to Article 2 of Law 3789/57, as in force from time to time. This appeal has a suspensive character.

(c) The termination of the employment relationship or cooperation with the reported person, without prejudice to the prohibition of abuse of right in Article 281 CC. It should be noted that the complaint may be made regardless of whether disciplinary proceedings are initiated or not.

Cooperation and provision of all relevant information to the competent authorities upon request

The company, as well as any person or department responsible for receiving and managing such complaints at company level, shall cooperate with any competent public, administrative or judicial authority which, either on its own initiative or following a request by an affected person, within its competence, requests the provision of data or information and undertake to provide assistance and access to the data (Article 5(1) of Law No. 4808/2021). To this end, any data they collect, in any form, are kept in a relevant file in accordance with the provisions of Law No. 4624/2019.

III. DRAFTING AND IMPLEMENTATION OF THIS POLICY

This policy has been drawn up after informing employees and posting the draft policy in the workplace or making it public in order to obtain the views of all personnel, where there are no trade unions and employee councils within the company.

In this context, employees had the opportunity, within ten (10) days of the posting of this policy as a draft, to submit proposals on the content of this policy, for each individual regulated issue, including, but not limited to, the rights and obligations of individuals in cases of violence and harassment in the employment relationship, the procedures for informing, receiving and investigating complaints, as well as to identify areas or work arrangements that, by their characteristics, involve greater risk of violence and harassment, taking into account the object and the specificities of the enterprise as well as the nature of the provided services, and groups of persons which are potentially more exposed to such risks, in order to take measures for their effective protection.

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After ten days following the posting of this policy, as a draft, during which employees had the opportunity to submit their proposals, as described above, the content of the policy was finalised.

The adoption of this policy is completed by information actions on the part of the company, by posting it in the workplace, on the company's notice board and on the company's website, if available, while informing employees and their representatives in writing or by e-mail or by any other appropriate means.

In particular, provisions on disciplinary misconduct, disciplinary proceedings and disciplinary sanctions in the context of or following complaints about incidents of violence and harassment at work are a mandatory part of the Labour Regulation. Consequently, the company shall incorporate the text of this policy, following the procedure provided for its drafting or amendment.

In the event of a Company Collective Labour Agreement, this policy shall be subject to collective bargaining and shall be incorporated into the content thereof.

The company will evaluate the effectiveness of this policy and make any necessary amendments. To this end, it may collect anonymous statistical data and data on the way it is implemented in order to determine its effectiveness.

In case of modification of the policy texts, the company has the same obligation to inform employees and their representatives as when the policy was originally adopted.

This policy shall enter into force ten (10) days after its posting on the company's notice board and after its communication by any appropriate means to the persons subject to it, at which time they shall be deemed to have knowledge of it.

This policy must be permanently posted in accessible and visible places of work.

For the Company