

INTERNAL EMPLOYMENT REGULATION



MARCH 2023

CHAPTER ONE: GENERAL PROVISIONS

Article 1 - Aim

The aim of the present employment regulation (hereafter “the regulation”) is to regulate every issue related to the employment relations between the **Companies/Hotels of GRECOTEL Group** and their staff. More specifically, its aims are as follows:

- A. The creation, preservation and promotion of a climate of high-level interpersonal relations, based on mutual trust and good cooperation, between the employees and the Company.
- B. The mutual respect among the employees of the Company.
- C. The compliance with the necessary rules of conduct, hierarchy, ethics, safety and comfort upon provision of services and work.
- D. The rational and efficient operation of the Company, to the maximum possible extent, via the most appropriate combination of professional knowledge, ethics, specialization and use of the full potential of its human resources.

Article 2 - Validity

2.1. The provisions of the present regulation shall apply additionally to the provisions of employment legislation, the collective employment agreements and the individual employment contracts of the employees, without harming the legal interests of the Company or the staff.

2.2. The settlement of any issue not included in the present regulation shall fall within the managerial prerogative of the Company, which shall be exercised in accordance with the restrictions imposed by labor legislation and the Civil Code.

2.3. The Company reserves the right to amend or supplement the present regulation upon the authorization procedure and in accordance with the laws in force.

2.4. The omission on behalf of the Company, in some cases, to exercise one of its rights allowed by the present regulation shall not be considered as a silent renunciation, and shall not lead to the abolition or weakening of any term of the present regulation.

2.5. Any reference to employees or staff of the Company concerns equally and without any gender discrimination all the male and female employees of the Company.

Article 3 - Scope

The provisions of the present regulation that complements the individual employment contracts concern all the staff members of the **Companies/Hotels of the GRECOTEL Group**, who are connected to these companies via a dependent full- or part-time or job rotation employment relation, of indefinite or fixed duration, or come from a temporary work agency, that is engaged in the headquarters or branches - hotels of the Group, as well as in any other hotel unit or branch that the GRECOTEL Group will establish in the future.

CHAPTER TWO: STAFF REGULATIONS

Article 4 - Staff Recruitment

4.1. The staff recruitment shall take place following a decision from the Company Management, subject to the respective provisions of labor legislation and pursuant to the Company's Articles of Association and the respective decisions of the Management that may apply.

4.2. Every new recruit shall furnish, upon recruitment, all the certificates and recruitment documents required by law and by the resolutions of the Company Management. More specifically, the new recruit is obliged to furnish the following supporting documents:

- Curriculum Vitae followed by an Application for Employment or Reemployment.
- ID or Passport.
- Proof of TIN, Public Finance Department, Single Social Security Entity Registration Number and Social Security Number.
- Civil Status Certificates.
- Proof of payroll bank account.
- Residence and work permit for foreign employees.
- Health booklet, for the jobs where this is required by law.
- Every other document, that may be requested by the Human Resources Management of the Company.

The collection, keeping and processing of the above data shall be carried out in accordance with the applicable legislation regarding the protection of personal data, with the terms and conditions set out in law.

4.3. A written individual employment contract is drawn up with the new recruit. The employment contract is drawn up based on a sample approved by the Company Management. Every new recruit signs the individual employment contract with the Company upon his recruitment and is informed of the individual terms of the employment contract pursuant to the Presidential Decree under no. 156/94. The signature of a detailed

employment contract may replace the communication of the individual terms of the employment contract pursuant to the Presidential Decree 156/94.

4.4. The recruitment shall be dully communicated to the public authorities before the new recruit enters into service.

4.5. The personal and family data must be true. The Company is not liable in case of an employee damaged due to non-disclosing data that would confer any rights on him.

4.6. Every employee, for any change of his personal or/and family data that may occur during his employment relation with the Company, has to communicate such change to the Company submitting the required supporting documents attached.

4.7. Every employee recruited in the Company shall be informed of the present Regulation and declare in writing that he received a copy thereof.

4.8. It is prohibited from the employee to pay to the Company any amount as security or for any other reason upon his recruitment.

Article 5 - Discretion With Regard to the Salary

5.1. Every employee must be discreet with regard to the income of other colleagues of his, in case he becomes aware of it upon exercising special tasks within the Company.

5.2. Every employee must be discreet with regard to the remuneration he has received.

Article 6 - Staff Evaluation – Criteria

6.1. The occupation of the employees is subject to evaluation, for the objective and impartial weighting of the professional capacity and suitability of the employees with regard to their work and the tasks they perform, based on their qualifications and essential skills. For the evaluation, the general activity of the employee, the theoretical training, any special knowledge on the scope of the work, the experience, the interest, the creativity, the effectiveness upon exercising the various tasks, the quantitative and qualitative performance, the initiatives taken during work and the capability shown upon every action, are taken into account. The evaluation is undertaken by the Human Resources Management in cooperation with the relevant competent Head of Office.

6.2. The essential skills based on which the Company staff is evaluated are specified as follows:

6.2.1. Character and behavior: The willingness and capability of smooth and effective cooperation with any colleague, the collective spirit and the desire to participate in collective tasks and activities, the courtesy, the understanding and the composure as regards to relations and collaborations in general are assessed.

6.2.2. Performance: The work done by the employee to be evaluated is assessed, in terms of quantity and quality, in combination with his participation rate to the achievement of the Company's aims.

6.2.3. Professional capacity: The competence as regards the necessary knowledge for the field of activity of the employee to be assessed, the effort for continuous improvement of the professional knowledge, the capacity to assimilate the knowledge required for the exercise of his tasks, the scientific and professional training, the capacity to effectively use professional experience, the inventiveness upon exercising his tasks and the effective dealing with possible problems that may arise, the ease and confidence upon dealing with the problems of the work, as well as the possibility and stability to implement effective work methods are assessed.

6.2.4. Decisiveness – initiative: The spontaneous and on his own judgement action and measures taking or decision making, the pertinent dealing with and management of affairs, the responsibility assumption and the submission of proposals for the production of more effective work and the better service of the company aims are assessed.

6.2.5. Organization – Planning and Co-ordination: The capacity to organize the assigned work, in a regular and effective way, with adaptability to the changing conditions and requirements, aiming to avoid possible delays of the work exercised and to increase productivity, the capacity to prioritize the tasks to be completed, the capacity to divide the tasks, the planning and regular inspection of the sound and timely execution – fulfillment of the aims and the current tasks are assessed.

Article 7 - Individual Service Files

7.1. For every employee of the Company, an individual service file is kept, that contains all the necessary data regarding his service and family status.

7.2. As regards the data contained in the individual service file of each employee, the respective legislation for the protection of personal data is applied and these data cannot be used for any other purpose than the working status and the evolution of the employee within the Company.

7.3. In any case, via an application on behalf of the employee himself, the Company is obliged to provide to him exact copies of the documents included in his individual service file.

CHAPTER THREE: TERMINATION OF EMPLOYMENT RELATION

Article 8 - Termination of the Employment Relation

8.1. Due to termination of the Employment Contract by the Company. The Company has the right to terminate the employment contracts of its employees, in accordance with law. The termination of the employment contracts of the staff associated with the Company via employment contracts of indefinite duration shall take effect pursuant to the provisions of the labor legislation in force.

8.1.1. The dismissal compensation shall be calculated in accordance with the applicable legislation in force.

8.1.2. In case the employee has committed a criminal offense, the provision of article 5 par. 1 of Law 2112/1920 shall apply, as in force.

8.2. Due to a Conviction. The contract shall be automatically dissolved in case of conviction of an employee, by an irrevocable court decision, to a sentence of temporary or life imprisonment. For the termination of the employment relation due to the cases mentioned in the present paragraph, a relevant resolution of the Company shall be issued and communicated to the employee. The termination of the employment contract takes effect on the date when the Company becomes aware of the irrevocable court decision.

8.3. Due to fulfillment of the conditions for a full age pension. Once the conditions for a full age pension are met, the employee has the right to leave or the Company has the right to remove the employee. In both cases, the compensation shall be calculated in accordance with the provisions of article 8 indent b' of Law 3198/1955, as replaced by par. 1 of article 5 of Law 435/76 and in force since then, in combination with the Company Policy. The employee must inform the Company when the conditions for a full age pension are met and submit to the Company all the documents that may be requested.

8.4. Due to termination of the Employment Contract by the employee (voluntary departure). Every employee has the right to voluntarily leave the Company. The resignation shall be submitted in writing by the employee to the Company, while the employment relation shall be terminated upon receipt of the resignation, in accordance with the provisions of the individual employment contracts and the legislative provisions in force. With respect to professional ethics, the employee must, in due time, as provided by law, inform the Head of Office regarding his decision and fulfill his professional obligations/duties before leaving. For

the preparation of the standard procedure of disengagement, the employee leaving is obliged to deliver every asset of the Company provided to him in order to facilitate the execution of his tasks.

8.4.1. The employees, provided that they meet the conditions of article 8 indent a' of Law 3198/1955, as in force each time, can voluntarily leave, after applying in writing for the consent of the Company. The Company has discretion to provide its consent to the voluntary resignation of the employees. In case the Company provides its written consent, the reduced compensation provided by law shall be paid.

8.5. Due to the death of the employee

8.6. Due to the expiry of the employment contract of fixed duration or expiry of the works contract. The employment contract of fixed duration or the works contract is automatically terminated, without any compensation, upon the expiration of the period provided, in the case of employment contracts of fixed duration, or upon the completion of the work, in the case of works contracts, provided that the said contracts are not renewed in writing.

8.7. Due to termination of the employment contract of fixed duration or of the works contract, with or without cause, implementing a relevant clause of the individual employment contract regarding the termination before the end of the fixed duration and transforming the employment contract to an employment contract of indefinite duration upon termination, in accordance with the provision of article 40 of Law 3986/2011, as in force.

8.8. Every employee, who is licensed or leaves his work, is obliged to deliver to the competent Direction / Department before leaving, with relevant proof of delivery or a delivery and acceptance protocol, all the service documents, notes, circulars, technical manuals, books, etc. he might keep, as well as any other asset of the Company, together with the treasury management analysis he might hold. The Company has the right to claim from the employee compensation for possible damages, loss of materials, tools, etc., in case it can be proven that the employee is responsible, in accordance with the provisions of article 664 of Civil Code.

CHAPTER FOUR: WORKING TIME – ABSENCE – ILLNESS - MATERNITY

Article 9 - Working Time Limits

9.1. The working timetable of the staff and the working hours are determined by a resolution of the Company Management, following the legal procedure and the legal working limits set out by the provisions of labor legislation for the various categories of staff.

9.2. The working hours (start, break and ending of the work day) are specified by the Company and shall be included in a list electronically submitted to the ERGANI information system and communicated to the employees prominently posted in a prominent location at the workplace. The Company always retains the right, within the law and the local conditions, to freely amend the working hours in order for its needs to be fulfilled.

9.3. The time for starting and ending the work day may vary among the employees, but it shall be specified by the Company depending on its needs.

9.4. All the members of the staff have to be at the workplace and leave it upon the time indicated by the Company. In case of late arrival at the workplace or early departure from it without the prior approval from the Director, the Management has the right to reduce the salary depending on the time period of late arrival at the workplace or the early departure, as well as to impose a disciplinary measure pursuant to the present Regulation.

9.5. The provisions of the present regulation and the provisions of law referring to the working hours do not bind individuals that hold a Managerial position (managing directors) or trusted persons, within the meaning of Law 2269/1920 and the other provisions of labor legislation, as in force.

9.6. The Company, following a resolution of the Management, will specify when and under which conditions overtime work shall be provided. Every employee is obliged, in good faith, to work overtime, following an order from the Company or an authorized body, within the limits specified by the provisions and laws in force. The Company, in any such case, shall compensate the employee in accordance with the provisions in force. No overtime work shall be done, without the prior approval from the Company Management.

9.7. In the case of limitation of the financial activity of the Company due to force majeure or lack of work, the Management has the possibility, instead of terminating the employment contracts of the employees, to put its staff on suspension in writing, pursuant to the provisions of law.

9.8. The Company may implement a job rotation system on the interest of the total of the employees, as set out by the relevant legislative provisions, as well as take any other legal measure.

9.9. The days of weekly rest of the staff are the ones mentioned in the relevant establishment and timetable plans, submitted to the ERGANI information system, as set out by the labor legislation in force.

9.10. The employees' annual paid leave, as well as any other types of leave provided for by labor legislation or collective labor agreements, shall be granted in accordance with the applicable legislation in force.

Article 10 - Absence

10.1. The employee may, for any of the below mentioned indicative reasons, be absent from his work.

A. illness / visit to a doctor

B. appearance before a public authority (Court, Military Unit, etc.)

C. visit to school/s in order to get informed on his children's progress.

10.2. In order to be absent – for the aforementioned reasons B and C – from the Company, the completion of the relevant document and the approval from the Head of Office and the Manager shall precede.

10.3. In case the employee, for any reason, cannot go to his work and is not able to previously ask for a leave of absence, he must notify his Head of Office without delay. In case of non-notification, his absence shall be regarded as unjustifiable.

10.4. In case of an unjustifiable absence, the Company is not obliged to pay the salary, retaining at the same time any legal right that may arise.

10.5. In order for the absences mentioned in paragraph 1 of the present document to involve payment, the supporting document provided by the Competent Authorities shall be filed.

Article 11 - Illness

11.1. The absence from work due to illness shall be certified by a "Medical Opinion" of a doctor of the Single Social Security Entity or of the employee's relevant social security entity; this medical opinion must be filed by the employee upon his return to work. The above medical opinion must be filed within two working days from the day of absence.

11.2. The Company will cover ½ of the daily wage for the first 3 days of each period of illness. In any case of absence due to illness for a period greater than 3 days, a relevant medical opinion and a sick leave from the social security entity (Single Social Security Entity, etc.) must be provided.

11.3. For a period of illness greater than three days, the Company shall cover the amount remaining from the daily pay supplement paid by the Single Social Security Entity (or any other social security entity) in order to cover the total of the nominal daily wage of the employee, for the time set out by the provisions in force.

11.4. The consequences of absence of the employee from his work are those provided by the labor legislation.

Article 12 - Maternity

12.1. The pregnancy and postpartum leaves are provided in accordance with the relevant provisions of the labor legislation, as in force. During the first trimester of pregnancy, the employee is obliged to inform her Head of Office and the competent Direction of the Company, while she has to file to the Company a medical opinion referring to the possible due date. For the rest, the provisions on illness shall be applied.

12.2. In pregnancy, childbirth or post-natal period, the employee has all the rights provided by law, by the ministerial decisions, collective employment agreements and Arbitration Awards binding the Company, while she has all the obligations towards the Company imposed to her by the said legal provisions. After giving birth, the working mother has all the additional rights provided by the labor legislation in force for the time period set out by the said legislation.

12.3. Every working father is entitled to all rights granted to him by the applicable labor legislation, for the duration specified therein.

12.4. The Company grants all types of leave provided for by the applicable legislation regarding the balance between professional and private life for parents and caregivers, as well as leave related to the protection of the family, as defined by law.

CHAPTER FIVE: STAFF DUTIES AND RESPONSIBILITIES

Article 13 - Non-competition Clause

The employees are under the obligation to avoid any activity that could be considered to be in competition with the Company's activities and are prohibited to obtain interests, or undertake obligations, or participate in any way, directly or indirectly, in companies with a commercial or other gainful employment identical to or similar, directly or indirectly, with the Company's employment, or be directly or indirectly employed in another business or on

behalf of a third party, natural or legal person, or as individuals in a form of employment that can be a part of or in competition with the activities of the Company.

Article 14 - Confidentiality

14.1. The staff must treat with confidentiality any information or event of which they might become aware because of or on the occasion of exercising their tasks.

14.2. It is prohibited to provide any information to any third party without the prior special permission by the Company, unless this information has to be provided by the employee, due to the nature of his work.

14.3. Every employee is obliged to treat with absolute confidentiality any information regarding the organization of the Company, as well as the methods and systems used.

14.4. In case an employee becomes aware of confidential information regarding the Company (e.g., information related to issues that are not generally known by people outside the Company, or issues pertinent to products and services it offers, as well as issues regarding its activities in general), he has the obligation not to communicate this information neither use it, unless there is an explicit written approval on behalf of the Company. This is the case for information received either intentionally or not by the employee.

14.5. Every employee, upon the expiry of his employment relation with the company or whenever the Company may request, is obliged to deliver all documents, plans, files that may contain confidential information regarding the Company.

14.6. The members of the staff must avoid anything that might be in breach of the unfair competition law or might incur sanctions against them pursuant to provisions of the Penal Code and other relevant penal provisions.

Article 15 - Obligations of the Staff

The employees must:

15.1. Arrive in time at the workplace in accordance with their work schedule in force and take up work at the time scheduled.

15.2. Willingly comply with the resolutions and orders of the Hotel Management, as well as of the Heads of Office of the various departments. More specifically, the employees have to conform to the provisions of the General Regulations of the Company, the procedures set out each time by the Company, as well as the resolutions, general or special directives from the

Management, and the other authorized bodies; they also have to conform to the service guidance of their superiors, within the managerial prerogative. In this context, the employees have to accurately execute the oral and written orders from their Head of Office and follow their directives and guidance, as regards the work to be done. The written announcements of general nature, circulars, statutory directives of the Company, shall be posted on special notice boards and shall be regarded as personal documents, addressed to each one of the employees separately and the ignorance thereof shall not be allowed.

15.3. Behave decently to every Head of Office, colleague or third party that may interact directly with them for Company affairs. More specifically, the Heads of Office and subordinates have to treat their relations with due respect. They must behave in a spirit of cooperation and not cause any friction.

15.4. Contribute in all good conscience to the quiet and pleasant stay of customers, aiming to create a neat atmosphere and give the impression to the customer or visitor that he has come to a hospitable, decent and civilized place.

15.5. Be especially careful when they open and close the doors and windows, something that must be done quietly; report to their Head of Office any possible damage caused by a customer to any of the room furniture or any possible loss of objects that were in the room before the customer's departure.

15.6. Return to the kitchen or canteen any food and beverage not consumed by the customers; any remainders shall be thrown in the special container.

15.7. Arrive to their work appropriately dressed, using the uniforms provided or indicated, without altering them. More specifically, with regard to his appearance, each employee has to keep in mind the following points:

- The male employees shall have regular haircuts and shave on a daily basis,
- Women with long hair shall keep it tied back,
- All employees shall have their nails trimmed, groomed and clean,
- The uniform shall be always clean and freshly ironed. The shirt shall be always buttoned up and carefully stuck in the trousers and the bow-tie shall be clean and steady.
- The belt and socks shall have a color close to the color of the uniform.
- The pockets shall be empty, without any cigarettes, money (coins), hairbrushes, keys or other small objects.
- The shoes shall always be polished.

15.8. Be keen on the Hotel's interests, preserve its secrets and not provide information to unauthorized persons in and out of the Hotel. Perform their tasks diligently and defend and promote the Company's interests in any lawful way. The performance of the tasks shall be

done with the greatest possible diligence, individually and collectively, aiming to its timely and optimum handling. The provision and exchange of knowledge between the employees, always in a spirit of good cooperation, contributes to the individual effectiveness as well as the effectiveness of the Company as a whole.

15.9. The employees must not cause any damage or deterioration to furniture, tools, material or any other asset of the Company and must keep and preserve these assets in a good condition. Any damage or tear of the assets of the Company, willfully caused by the employee, obliges him to pay a compensation depending on the damage or tear caused; such compensation shall be deducted from his salary in accordance with the provisions of article 664 of the Civil Code.

15.10. Perform their tasks responsibly and in accordance with the provisions in force, as well as any task other than their usual task in case of emergency, in the spirit of good cooperation and effort to fulfill the Hotel's aim; such an extraordinary occupation cannot be considered, in any case, to be an unfavorable treatment towards the employees within their specialization.

15.11. Inform the Staff Office regarding their exact address of residence and any possible change of their family status.

15.12. Immediately inform in case of infection from a contagious disease.

Article 16 - Banning Orders

The employees are prohibited to:

16.1. Proceed to actions that might be contrary to their aforementioned responsibilities.

16.2. Use the objects owned by the customers.

16.3. Smoke in all enclosed spaces of the Company (rooms, halls, corridors, etc.) pursuant to Law 3868/2010, as in force, as well as in any other space of the Company (enclosed or outdoors) in front of the customers.

16.4. Sing, whistle and make noises in general within the workplace. More specifically, it is prohibited to use radio players and other audio transmitting machines, unless this use is within the Company's activity.

16.5. Go around and be in the corridors or the halls when no task has to be performed.

16.6. Have any dispute with the customers, even if they are right, or have long discussions with them.

16.7. Behave intimately to the customers and, especially, with friendly gestures.

16.8. Accept visitors during their work.

16.9. Be in the Hotel at times or spaces not specified by the Management.

16.10. Directly or indirectly demand any tips from the customers. More specifically, the employee is prohibited to accept any presents for performing his tasks or ensure, for himself or his family, other kinds of advantages and benefits.

16.11. Make phone calls, unless it is an emergency, using appliances other than the ones specified by the Management to be used by the staff. More specifically, the employees are prohibited to use the assets of the Company, such as the computers, tools, machinery, etc., for personal reasons, not pertinent to the Company (e.g., unnecessary use of the Internet or the telephones).

16.12. Use any entrance and exit doors other than the ones specified for the staff by the Management.

16.13. Leave their workplace during the working hours, without prior permission from the Head of Office and the Staff Office.

16.14. Provide and sell any kind of objects not coming from and not offered by the Company, both to the customers and to the other members of the staff, without prior permission from the Staff Office.

16.15. Engage in any kind of propaganda, beyond the legitimate trade union action, as well as receive payments in the form of fund-raising for any purpose. The payment of fees by the employees to their trade unions is not regarded as fund-raising.

16.16. Use the machinery and equipment of the Hotel when not appointed to do so.

16.17. Be inexplicably absent from their position. In case of absence due to illness or any other serious reason, the employee has to immediately inform his Head of Office and the Staff Office, except for cases of force majeure or illness that renders the immediate notification naturally impossible.

16.18. Accept to store objects of customers or third parties. The employee, in case he finds an object in the Hotel or in its surroundings, must deliver the said object to the person appointed by the Management to collect this type of objects.

16.19. Use other toilets than the ones intended especially for the personnel.

16.20. Eat in other places than the ones specified by the Management or at times out of schedule.

16.21. Introduce and use, in the workplaces, alcoholic beverages and arrive at the workplaces in a non-sober condition.

16.22. Leave the Hotel wearing the hotel uniform.

16.23. Take away from the workplaces of the Company any documents, plans, samples, copies or excerpts thereof, without prior special permission.

16.24. Eliminate or alter any document or plan related to the Company's interests.

16.25. Export any material, tool, product and, in general, any asset of the Company, without prior special permission.

16.26. Proceed to any writing activity, lecture, publication, announcement to the press, post on the social media, concerning the Company, without prior permission from the competent body of the Company.

16.27. Hamper the performance of the tasks of colleagues.

16.28. Organize gatherings within the spaces of the Company without prior permission, except for the cases set out by Law 1264/82, as in force.

16.29. Take part in quarrels, express themselves with insults, lewd gestures and battery.

16.30. Every action or omission in general, that might harm the smooth operation of the Company, unsettle the discipline or decrease the Company's repute, shall be prohibited.

16.31. Any form of violence or harassment in the workplace is strictly prohibited.

16.32. Any act or omission that may harm the smooth operation of the Company, undermine discipline, or diminish the Company's reputation is strictly prohibited, as is the violation of any provision of this Internal Work Regulation.

Article 17 - General Duties of the Heads of Office

17.1. The Heads of Office of the Hotel are responsible for the smooth operation of their services, as well as for the good performance of all the employees working there, based on the orders of the Hotel Management. They must ensure that all their subordinates become aware of the general or special orders, circulars and directives in force and concern them or their service, supervise for their proper observation and for the diligent and responsible performance of the tasks of their subordinates, provide them with any necessary direction and clarification. More specifically:

17.2. They coordinate in general the actions of the departments they supervise and monitor the implementation of the regulation, the Management's directives and other orders.

17.3. They guide the actions of their subordinates aiming for a more effective performance, indicating the ways to improve the working systems.

17.4. They ensure the continuous improvement and progress of the employees.

17.5. They inform their subordinates regarding any general or special order that might concern their service and provide the necessary clarifying directions for the execution of such orders.

17.6. They are responsible for the timely and exact exercise of their work, the study and processing of the various issues within their area of competence without delay and the general operation and effectiveness of their service.

17.7. They can assign to the employees additional tasks beyond their usual work, within their capabilities and area of work and only in extraordinary circumstances and temporarily, due to lack of personnel or excessive workload or delay of the work to be performed, always within the managerial prerogative.

17.8. Behave to and treat the staff in accordance with the modern business management, continuously promoting human relations.

17.9. Aim to increase the employee productivity, for continuous improvement of the employees, systems and working tools.

17.10. They immediately inform the Human Resources Management, for any necessary alteration or extension of the working hours (alteration of the daily working hours, replacement of an employee being absent by another employee who might have the day off, necessity of overworking or working overtime, etc.), before its implementation, so that the legal actions provided by the labor legislation can be executed.

CHAPTER SIX: HYGIENE & SAFETY PROVISIONS

Article 18 - Hygiene In The Workplace

18.1. The Company is obliged to ensure the cleanliness and hygiene of the workplaces, the public spaces, and its facilities in general.

18.2. The same obligation to keep the above mentioned spaces clean binds the employees as well.

18.3. Moreover, the employees have to keep all the objects provided to them by the Company for the performance of their tasks clean and in a good condition.

18.4. Additionally, the Company cooperates with an occupational physician, who visits the Company's facilities on a regular basis in order to examine the employees and make advisory medical suggestions to the Company Management for the benefit of the work of the employees. The schedule of visits from the Occupational Physician is posted in the Company's facilities.

Article 19 - Safety In The Workplaces - Fire protection

19.1. The Company is obliged to take every appropriate measure for the safety in the workplaces in general (buildings, machines, facilities, etc.), in order to avoid possible accidents, while the employees are obliged to carefully use the facilities, tools, electromechanical and electronic equipment and material of the Company. The Heads of Office and their replacements are obliged to take every preventive measure to prevent and counter every possible risk that may cause accidents to the staff or damages to the machines and the Company in general.

19.2. The directions that need to be followed by all employees in case of fire or other danger are posted in all Company facilities. The employees have to know the directions well and especially the path that they need to follow in order to exit the Company facilities. More specifically, one can find in the entrance of the building the exact directions for the necessary actions to be followed by the staff and the public in case of emergency, layout plans of the Hotel for the information of the emergency services, where he can find highlighted the

following places: the stairs, the emergency exits, the final exits, the location of fire extinguishers, fire hose reels and spots feeding the permanent fire extinguishing network, the power supply switches, the mechanical ventilation system, or possibly the coal gas or liquefied gas system, the position of the main switchboard of the fire detection and alarm system, as well as the position of the hazardous spaces. On every floor, one can find a simplified guidance plan posted near the stairs. Every room or stay facility has a sheet with clear directions regarding the necessary actions, in case of fire, together with a simplified plan of the floor, where the position of the room is highlighted in relation to the escape walkways (emergency exits, stairs, etc.). In the directions, the prohibition to use the elevators in case of fire is highlighted. The directions, apart from the Greek language, are also available in at least one more language, spoken by the majority of the customers that usually visit the Hotel.

19.3. The Hotel Management is responsible to organize and train all the members of the staff so that, in case of fire, they will be able to execute the appropriate directions and effectively contribute to the evacuation of the Hotel from all the residents. The Management is also responsible for the sufficient maintenance of the existing fire extinguishing tools. The Hotel staff, at least once a year, participates in training courses in order to learn how to handle the fire extinguishing tools, to raise the alarm, as well as in at least one exercise of evacuation of the building facilities.

19.4. All employees have to immediately report to their Head of Office any possible anomaly or damage presented in the company facilities, and the Company is obliged to ensure the immediate fixing thereof and take all the necessary measures for the safety of the employees.

19.5. All the employees have to willingly comply with the written or oral directives of any Head of Office regarding the working method and the terms of safety and hygiene. Every employee has to immediately announce to the Company's officer every suspicion of fire, or smoke, or any relevant odor and find the source thereof either with him or alone. In case of fire or other emergency (explosion, earthquake, etc.), the employees are obliged to provide the assistance that may be requested by the Company's officers. Every employee is obliged to use the fire extinguishing tools, in accordance with the training he has received from the Company and solely in order to deal with the fire, and immediately announce any possible damage in these tools or in the electronic or other facilities that he might become aware of. Every employee has to notify his Head of Office or the competent service, for any event that might reach his attention and could cause danger against persons or damages to the Company facilities.

19.6. In case of an accident, this has to be immediately communicated to the Company or the competent Head of Office and first aid shall be administered to the suffering person until the relevant medical support arrives. The competent Head of Office has to fill in a written report regarding how the accident happened, the kind of the accident, the time it took place, as well

as the witnesses thereof and submit it to the Staff Management of the Company. The accident shall be communicated by the Company to the competent services, as set out by law (competent branch of the Single Social Security Entity, the competent police station and the Labor Inspectorate Body).

19.7. The company cooperates with a Safety Technician, who visits all the Company facilities on a regular basis and inspects the facilities and takes all preventive measures for the protection of the employees and the avoidance of accidents. The schedule of visits of the Safety Technician is posted in the Company facilities.

19.8. Every employee has to comply with the hygiene and safety policy of the Company. More specifically, he has to participate and undertake an essential and responsible role in maintaining a healthy and safe working environment via the following actions:

- He has to participate to the safety and hygiene system of the working environment.
- He has to follow the right procedures and use the right equipment.
- He has to wear protective clothing and equipment if necessary.
- He has to report any possible pain or distress as soon as possible.
- He has to ensure that all accidents and incidents are reported.
- He has to help so that the new employees, the trainees and visitors in the workplace correctly understand the safety procedures and the reason of their existence.
- He has to immediately report to the Manager any possible concern regarding the hygiene and safety of the Company.
- He has to keep the working environment clean and neat so that the risk of accident is decreased.

CHAPTER SEVEN: OUT-OF-OFFICE WORK

Article 20 - Out-of-office Work

20.1. In the case the out-of-office work of the staff is necessary, the Company covers the expenses regarding the transportation, accommodation and food.

20.2. The Company, following a resolution of the Management, shall specify when and under which circumstances out-of-office work must be performed. Every employee has to work out of office, when indicated by good faith, following a relevant order on behalf of the Company or an authorized body, within the limits specified by the provisions and laws in force. No out-of-office work shall be performed, unless prior permission by the Company Management has been given.

CHAPTER EIGHT: STAFF TRAINING

Article 21 - Staff Training

21.1. The Company considers the staff training important, and ensures that its staff participates in training programs, organized either by the Company itself or by special training entities. The training is a direct tool for the qualitative development of the employee and the work he may offer.

21.2. Based on the approved budget, the Department Managers may recommend to the Company Management the necessity to organize training seminars aiming to improve the knowledge and productivity of the staff. The Company Management collects and processes these data and organizes the training plan for the following year.

21.3. The Company Management examines in any case the possibility of allowance granted by state and community financial allocations for the seminars. The Company pays only for training programs performed by organized and recognizable institutions that can issue legitimate justifying evidence.

CHAPTER NINE: DISCIPLINARY OFFENSES - PENALTIES

Article 22 - Disciplinary Violations

22.1. The relations between the Company and the staff are based on mutual trust and willingness for close and sincere cooperation. A condition for this mutual trust and cooperation is the full compliance with the terms of the present regulation, procedures, directives and orders of the Company, as well as the laws in force.

22.2. Any action or omission on behalf of an employee, that might harm the Company's interests, undermine the discipline or deteriorate the Company's prestige or the reputation of the employees, is a disciplinary offense.

22.3. For the uninterrupted operation of the Company's services, the safeguarding of its interests, and, in general, the maintenance of order and smooth functioning within its departments, the disciplinary rules applicable to legal entities are hereby extended and implemented through this Regulation for all Company personnel. The following disciplinary offenses are identified and listed:

1. Late arrival at work, unjustified absence, and leaving the workplace during working hours without permission from the Supervisor and the Personnel Office, as well as failure to use the digital work card (articles 9.4, 10.3, 15.1, 16.13, 16.17).

2. Disobedience to any lawful orders, instructions, and circulars issued by Management and the competent bodies of the Company (article 15.2).
3. Improper conduct and behavior toward Supervisors, colleagues, and third parties (article 15.3).
4. Lack of due diligence required for the performance of duties (articles 15.4, 15.5, 15.6, 15.8, 15.10, 15.11).
5. Improper appearance (article 15.7).
6. Causing damage or wear to any property of the Company (article 15.9).
7. Smoking in the Company's indoor areas and smoking in any Company area in the presence of customers (article 16.3).
8. Creating unnecessary noise during work that disturbs the quiet working environment (article 16.4).
9. Unnecessary wandering in corridors, receiving visitors during working hours, being present at times or in areas not designated by Management, using entrances/exits and restrooms other than those designated for staff, and consuming food at times or in areas other than those designated (articles 16.5, 16.8, 16.9, 16.12, 16.19, 16.20).
10. Unnecessary use of the Company's telephones, computers, and other equipment for purposes unrelated to work (article 16.11).
11. Use of hotel machinery and equipment by an employee who is not authorized to do so (article 16.16).
12. Leaving the Hotel wearing work uniforms (article 16.22).
13. Obstructing colleagues in the performance of their duties (article 16.27).
14. Any act or omission that may undermine the Company's reputation, financial condition, or smooth operation (article 16.32).
15. Negligent performance of general Supervisor duties (article 17).
16. Any action harmful to the environment and contrary to the Company's Environmental Policy (article 26).
17. Refusal to perform contractual work duties.
18. Violation of the obligation of non-competition and confidentiality regarding Company matters and the use of any information or data obtained through employment (articles 13, 14).
19. Violation of confidentiality regarding salary (article 5).
20. Concealment of a possible infection by a communicable disease posing risks to the health of colleagues and third parties (article 15.12).
21. Illegal use of Company property and illegal possession of items belonging to the Company, customers, or colleagues (articles 16.2, 16.18).
22. Arguments with customers and improper behavior toward them (articles 16.6, 16.7).
23. Bribery, acceptance of gifts, or use of Company resources for personal tasks or tasks of third parties unrelated to the Company (article 16.10).

24. Distributing or selling any kind of items not originating from or offered by the Company, whether to customers or staff, without approval from the Personnel Office (article 16.14).
25. Any form of propaganda, except lawful trade-union activity, as well as collecting money for any purpose except the payment of trade-union contributions (article 16.15).
26. Bringing into or using alcoholic beverages or narcotic substances in the workplace, as well as reporting to work in a state of impaired sobriety (article 16.21).
27. Removing from Company premises any documents, plans, samples, photocopies, or extracts thereof without specific authorization; destroying or falsifying any document or plan related to the Company's interests; removing any material, tool, product, or property of the Company without authorization (articles 16.23, 16.24, 16.25).
28. Any writing activity, lecture, publication, press announcement, or social media post concerning the Company without prior authorization (article 16.26).
29. Organizing gatherings within Company premises without permission, except as permitted under Law 1264/82, as in force (article 16.28).
30. Arguments, insults, obscene gestures, and acts of physical violence (article 16.29).
31. Violation of hygiene rules in the workplace (article 18).
32. Violation of safety rules in the workplace (articles 19.4, 19.5, 19.6, 19.8).
33. Any act of discrimination, victimization, or harassment on the grounds of gender, age, family status, sexual orientation, race, color, religion, beliefs, or nationality (articles 16.30, 27.6).
34. Any form of violence or harassment in the workplace (article 16.31).
35. Violation of any provision of this Regulation or of any applicable laws and regulations.

Article 23 - Disciplinary Penalties

In the case of the aforementioned violations, the Company Management shall impose, via its authorized officers, one of the following penalties, depending on the seriousness of the offense:

- An oral or written argument.
- A reprimand.
- A fine equal to -25% of the daily wage or equal to 1/25 of the salary. The fines deducted from the employees shall be paid as provided by law.
- Compulsory abstention from work for a maximum period of ten days for each calendar year for the same employee. During the said abstention, the employment contract shall be suspended and not interrupted. The employee is allowed to lodge an appeal against the penalty of compulsory abstention before the competent Regulatory Body of the Ministry of Labor, within five days from the day this is communicated to the employee, in accordance with article 2 of the Legislative Decree 3789/57, as in force. This shall have suspensive effect.

Article 24 - Imposition of Disciplinary Penalties

24.1. The Hotel Manager is the person responsible for the imposition of disciplinary penalties.

24.2. The disciplinary penalties must always be justified and shall be imposed as follows:

- An oral or written argument or reprimand shall be imposed to the employees for minor misdemeanors or offenses committed for the first time and not leading to working anomaly or damage for the Company.
- The penalty in the form of a fine shall be imposed in case of relapse into an offense, for which a reprimand had been imposed, or in case of disciplinary offenses showing negligence, carelessness, without causing incidental damage, or in case of disciplinary offenses for which a reprimand is not sufficient.
- The penalty in the form of suspension (compulsory abstention from work) shall be imposed in case of relapse into a disciplinary offense, or in case of a severe disciplinary offense, that could compromise the safety of people or the interests of the Company. Upon execution of this penalty, the person punished is not allowed to enter the Company's facilities and he does not receive any wage for the days of suspension.

24.3. Every violation shall result to the relevant penalty. The penalty shall be in proportion to the seriousness of the disciplinary offense and shall be imposed *ex aequo et bono* and in accordance with the principles of good faith and morality.

24.4. For any case of violation that may consist a criminal offense of the employee, the Company shall reserve the right to proceed to any legal action (e.g., filing of a suit).

24.5. The penalty of temporary suspension (compulsory abstention from work) or the fine is always imposed following a written summons towards the employee to testify in defense of himself, three (3) working days after the delivery of the summons to testify.

24.6. The decision to impose a disciplinary penalty is communicated in writing to the employee concerned, who shall sign a dated acknowledgement of receipt. In case the employee concerned denies to sign the acknowledgement of receipt, the employee of the Company who is responsible for the delivery, notes the said denial on the acknowledgement of receipt, sets a date on it and signs it.

24.7. The Company is obliged to keep a book set out by law, which shall include, in chronological order, the names of employees to whom fines have been imposed, in accordance with the present regulation, the reason why these fines were imposed and the time when the fines imposed were deposited to the special bank account on the name of the competent service of the Ministry of Labor.

24.8. The same book, in a special section, shall include the rest of the penalties also imposed to employees, written in the same way, in accordance with the present regulation.

24.9. A copy of the penalties shall be included in the personal file of each employee.

24.10. The aforementioned disciplinary proceedings is independent of the termination of the employment contract, that can take place irrespective of the launching or not of disciplinary proceedings.

Article 25 - Report and Complaints from the Employees

25.1. Every employee has the right to express a complaint to his direct Head of Office, filling out a special complaint form, in case he wishes to report an operational problem or believes that he is harmed or treated unfairly because of the behavior of his Heads of Office or his colleagues or for any other reason.

25.2. If the complaints concern his direct Head of Office, as well as in case of personal issues of great importance, the employee could address to the superior Heads of Office. More specifically, in extremely serious cases, such as the case of sexual harassment or human rights or children's rights violation, the employee can bypass the superiors and report directly to the Staff Officer or the Hotel Manager.

25.3. The procedure of report and complaints followed is as follows:

- Report of a complaint to the Head of Office, Staff Officer, as determined above.
- Filling of a complaint form by the employee, delivery of the form to the Staff Office and registration of this complaint in a complaint book.
- Start of a procedure to solve the problem, update the employee on the solution given and registration of the solution in the complaint book.

25.4. The employees have the right, after having exhausted their superiors and not being satisfied by the solution given, to express directly to the Management any serious complaint they may have related to their work and living and, in general, related to the workplace of the Company.

25.5. Employees are entitled—after having exhausted their hierarchical chain of command and not being satisfied with the solution provided—to express directly to Management any serious complaint related to their work or to their general living conditions within the Company's workplace.

CHAPTER TEN: ENVIRONMENTAL POLICY – CORPORATE SOCIAL RESPONSIBILITY POLICY

Article 26 - Implementation of Environmental Policy

26.1. The employees, apart from the aforementioned regulations, are bound by the Environmental Policy of the Company, as this is each time in force.

26.2. More specifically, the Company implements Procedures of Environmental Management in order to decrease, minimize and manage the environmental impacts. Developing the system of environmental management, the Hotel specifies all the environmental parameters related to its activities and develops procedures and programs aiming to the continuous improvement of its environmental performance.

26.3. The Company Management is committed to:

- Comply with any legislative or other requirement within which its activities fall and which is related to its environmental aspects.
- Assess the environmental impacts of its activities aiming to decrease or eliminate the negative effects.
- Take every possible action in order to prevent any type of pollution, that would deteriorate the local natural, residential environment and the quality of the touristic product offered.
- Via setting goals and continuous research for improved environmental techniques, pursue continuous improvement.

26.4. More specifically, the Company pursues, via environmental programs and goals, the regular inspection of the System performance and the re-examination of the measures-goals for their upgrade, as regards:

- The protection of the coastal habitat housing it and of the quality of the receiving waters.
- The implementation of measures/actions for energy and water saving, the correct management of the waste produced and the correct management and decrease of the solid waste produced.
- The maintenance of the good quality of the atmospheric air.
- The cooperation with local institutions, authorities and producers aiming to maintain the natural beauty of the area, as well as to support the local economy.
- The increase of the environmental awareness of the staff, visitors and collaborators of the Hotel, as well as of the local residents, organizing relevant seminars, events and presentations.
- The education and awareness-raising of the staff of the Hotel aiming to its active participation to the system of environmental management.
- The information of the customers on the environmental activities of the hotel unit, aiming to encourage their active participation.

- The invitation of local producers, NGOs and women's cooperatives that can organize presentations aiming to increase the interest of the visitors, to promote and help the identification of the local tradition, so that a close cooperation with the local community can be established.

Article 27 - Implementation of Corporate Social Responsibility Policy

27.1. The employees, apart from the aforementioned regulations, are bound by the Corporate Social Responsibility Policy of the Company, as this is provided and in force each time.

27.2. In the context of the Corporate Social Responsibility (CSR) Policy followed, the Company is active in a way ensuring the fair treatment of all employees and customers, the transparency of its policies and business practices, high standards on all issues related to health and safety in the workplace, moral business practices in all its actions.

27.3. The Company supports and respects the protection of the internationally proclaimed human rights, while it encourages its suppliers to comply with the international regulations on human rights. It defends the human rights and, especially, the children's rights, through training the staff and informing the customers, rejects, eliminates and condemns any form of harassment, especially sexual harassment, and especially when this affects minors, and rejects the forced or other type of child labor.

27.4. The Company effectively supports the needs of the local community where its activities take place, and takes initiative based on the local needs, continuously develops its relations with the local and broader community and encourages the dialogue with the local community to the benefit of both sides.

27.5. The Company is an equal opportunity employer and gives equal opportunities to all employees and jobseekers. Its aim is to ensure that no discriminations due to gender, age, family status, sexual orientation, race, color, religion, beliefs or nationality shall take place in the workplace, while it ensures equal treatment among the employees and jobseekers with special needs, and takes any practical measure in order to ensure the smooth integration of the employees with disabilities in their working group. The Human Resources Management realizes a periodic assessment of the equal opportunities policy and monitors the results and the implementation of this policy throughout the Company.

27.6. The employees are responsible to comply with this policy and ensure that all behavior patterns required by the Company are implemented via:

- The equal treatment towards the others and the avoidance of any type of direct or indirect discrimination, victimization or harassment.
- The information of the Heads of Office regarding any suspicion of violation of this policy.

- The cooperation for the promotion of a harmonious working environment free of discriminations, harassment and intimidation.

27.7. The Company ensures the continuous professional and personal development of all its employees. Some indicative voluntary benefits from the Company to its staff are the following: blood bank, training and education programs, travels abroad, free accommodation to the staff, bonus program, special prices when they stay in hotels of the Company and loan provision.

Article 28 – Application of the Office Operating Policy

28.1. Employees working in the Company's offices, in addition to the provisions of this Regulation, are bound by the Company's Office Operating Policy, as issued and amended from time to time by the Human Resources Department, insofar as it does not conflict with mandatory provisions of Greek law.

28.2. Indicatively and not restrictively, the following key principles of the current Office Operating Policy are attached to this Regulation and constitute an integral part thereof:

28.2.1. Basic entry–exit rules for the office:

- Employees must arrive at their workplace on time, in accordance with their applicable work schedule, and commence work at the designated time. In case of late arrival, they must inform their Supervisor, the Human Resources Office, and Reception. Failure to do so may be considered an unjustified absence.
- Employees must use their entry–exit card every time they enter or leave the office. In cases where an employee, for any reason, has not used their card despite being present for work, they must inform their Supervisor and the Human Resources Office.
- The card is personal and used exclusively by the employee to whom it is assigned. Use of another employee's card is prohibited.
- In the event of loss of the entry–exit card, employees must immediately notify the Human Resources Office.

28.2.2. In cases of annual leave, sick leave, or absence due to business travel, employees must notify the competent Company departments, as specified in the Office Operating Policy.

28.2.3. Meeting Rooms:

The reservation of meeting rooms is made through the Company's email platform. The employee who submits the request to reserve a meeting room is responsible for keeping it tidy and clean and for returning the equipment in proper condition. If they notice any malfunction, they must inform Reception.

28.2.4. Each employee is responsible for attending to their external partners or visitors.

28.2.5. Smoking is prohibited in all Company areas (offices, common areas, stairwells, etc.).

28.2.6. Common Areas:

Employees must respect their colleagues by maintaining quiet in corridors, at Reception, and in all common areas of the Company, keep common areas clean, notify the cleaning personnel

if they observe that an area requires cleaning, use storage spaces reasonably due to their limited availability and shared purpose, replace water bottles whenever they notice they are empty, and generally contribute to maintaining order and cleanliness in offices and common areas.

28.2.7. Basic cleanliness rules for the kitchen:

Employees must keep the kitchen clean, wash items after each use, place dishes in the dishwasher after rinsing them, ensure no food residue remains in the sink, use refrigerator space reasonably so all employees can be accommodated, refrain from consuming colleagues' food or beverages, not store or consume alcoholic drinks, keep common electrical appliances clean and turn them off after use (toaster, microwave, coffee machine, etc.), notify the responsible persons when consumables are running low, avoid removing consumables from Company premises for personal use, avoid consuming foods with strong odors, and maintain quiet while using the kitchen for meals.

28.2.8. Basic cleanliness rules for the restrooms:

Employees must keep restrooms clean, immediately notify the cleaning personnel when cleaning is required, always keep the restroom door closed, use bins for waste disposal, immediately notify cleaning personnel when consumables (paper, soap, etc.) run out, and wash their hands every time before leaving.

28.2.9. Basic cleanliness rules for offices:

Employees must keep their workspace clean, remove food debris and waste if consuming food, coffee, tea, water, etc. at their desk, ensure cleanliness of their computer equipment (screen, keyboard, mouse) using appropriate products, turn off their computer and any other devices when leaving, switch off lights and close windows, leave their workspace tidy and clean, avoid disposing of food or food waste in office bins and place such waste in the kitchen bin, and notify cleaning personnel when office bins are full.

28.3. The provisions of this Regulation that apply exclusively to hotel employees shall not apply to employees working in the Company's offices.

CHAPTER ELEVEN: FINAL PROVISIONS

Article 28 - Suspension of Voluntary Benefits

It is explicitly agreed that every voluntary benefit from the Company, even if not explicitly referred to in the present Regulation, is granted at the employer's discretion, is freely reversionary and is in no way incorporated to the obligations of the employer arising from the employment contract, neither is calculated as part of the employee's income, neither sets a working practice or custom.