



Policy for the prevention and combating of violence and harassment at work and the handling and management of internal complaints about incidents of violence and harassment of the company under the name "XENIOS TOURIST HOTEL" "Société Anonyme"

1. The **"XENIOS TOURIST HOTEL COMPANY ANONYME"** observes all measures and the obligations relating to the implementation of the provisions of Part II of the Law 4808/2021 on the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment, and of sexual harassment.
2. The purpose of this policy is to create and consolidate an environment work that respects, promotes and ensures human dignity and the right of every person to a world of work free from violence and harassment. **«XENIOS TOURIST HOTEL COMPANY ANONYME»** states that recognizes and respects the right of every employee to a working environment environment free from violence and harassment and that it does not tolerate any such behavior, of any form by any person.
3. This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the regulatory legislation implementing them and occupies the persons of paragraph 1 of article 3 of law 4808/2021.

A. Preventing and combating violence and harassment at work

a) assessment of the risks of violence and harassment at work,

The Company conducts studies in collaboration with all its departments and the responsible physician. work on potential risk factors depending on the nature and subject of the work provided, the psychosocial risks, among others and of the risks of violence and harassment at work, with the aim of assessing the existing working conditions and their readjustment in such a way as to to limit as much as possible the chances of an incident of violence occurring and harassment in the workplace.

b) measures to prevent, control, limit and address risks them, as well as for monitoring such incidents or forms behavior



The Company states that in the event that a person is affected by an incident of violence and harassment during access to employment, during the employment relationship or even if the contract or employment relationship within the framework of which it is alleged to have occurred the incident or conduct has ended, has: a) the right to judicial protection, b) appeal, filing a complaint and application for a labor dispute in the Labour Inspectorate, within the framework of its legal responsibilities, c) reporting to the Ombudsman, within the framework of his legal responsibilities, as well as d) complaint within the company in accordance with the complaints management policy.

c) information and awareness-raising actions for staff

The Company takes all necessary measures to inform and raise awareness the staff, using the appropriate means as above, as appropriate, for the combating violence and harassment, ensuring that everyone is aware of the the company's policy and procedures regarding incidents of violence and harassment, know where to turn in case of violence or harassment, as well as the opportunities given to them by law.

d) information on the rights and obligations of employees and the employer, as well as the persons exercising managerial rights or representing the employer, to the extent and degree of their own responsibility, in the event of an event or reporting or denouncing such incidents, as well as for the relevant procedure

The Company hereby informs the personnel and maintains in a visible place the details of the competent administrative authorities, to which any person has the right to appeal affected person (Labor Inspectorate, Ombudsman), in particular it informs about the S.E.P.E. complaint hotline (15512) but also through the line citizen service 1555 and <https://1555.gov.gr/>, as well as for the direct psychological support and counseling service for female victims gender-based violence who can contact the SOS Line 15900 (General Secretariat

Demographic and Family Policy and Gender Equality - General Secretariat for Population and Family Policy).

B. Procedure for Submitting and Managing Internal Complaints – Reporting Person

Any employee against whom any incident of violence has occurred and harassment, may submit an oral or written complaint to the



PANTELIDI PANAGIOTI. Manager of the hotel ANASTASIA RESORT which is designated and as a “reference person” for this policy. The complaint may submitted in person, or via email to the electronic address om.ana@xv-hotels.com The complaint cannot be made anonymously.

The complaint must include the details of the person complained of, i.e. the person who has engaged in a form of prohibited conduct, as well as specific incident(s) that substantiate it.

The reporting person thoroughly investigates each complaint and collects any information is necessary regarding it. Complaints and investigations remain strictly confidential to the greatest extent possible, taking into account the sensitivity of the case and the confidentiality of all those involved.

Once the reporting person has completed their investigation, they submit a written report to the company's Management, in which it states the results of the investigations. In the event that an incident of discrimination actually occurs treatment, violence or harassment or retaliation, the company's Management proceeds, at its discretion, case, to take all necessary, appropriate and proportionate measures against the offender. These measures may include, but are not limited to: a) the recommendation of disciplinary compliance, b) changing the job position, hours, place and manner of his/her employment contract, c) termination of the employment or cooperation contract with the company, without prejudice to the prohibition of abuse of rights under article 281 of the Greek Civil Code. In any case, the offender may be subject to criminal or civil penalties.

liability, in accordance with applicable legislation.

Obligation of impartiality and confidentiality

The reporting person is obliged to act during the investigation process of the complaints in an objective and impartial manner. In addition, it must behave with respect towards all parties involved and in a confidential manner and secret.

Prohibition of Retaliation - Victimization of the Complainant



Retaliation and victimization of the complainant, who, as a aggrieved person, claimed his rights and submitted a written complaint regarding with an incident of violence and harassment. If any employee or third party who is connected in any way with the company believes that he has been subjected to conduct retaliation for filing a complaint or providing assistance in the process investigating incidents of discrimination, violence and/or harassment, must follow the above procedure for reporting the said retaliation incident.

Cooperation with administrative and judicial authorities

Our Company cooperates with any competent public, administrative or judicial authority, the which, either ex officio or upon submission of a request by an affected person, to within the scope of its competence, requests the provision of data or information and are committed to providing assistance and access to data.

Communication manager

For more information about this policy, any interested party person can contact PANTELIDIS PANAGIOTIS, responsible for hotelANASTASIA RESORT.

The General Manager

Kostoglou Georgios

Date 01.06.2024