

APPENDIX TO THE INTERNAL REGULATIONS

POLICY FOR THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT AT WORK & POLICY FOR THE MANAGEMENT OF INTERNAL COMPLAINTS REGARDING INCIDENTS OF VIOLENCE AND HARASSMENT AT WORK, PURSUANT TO ARTICLES 9 AND 10 OF LAW 4808/2021.

1. Our Company complies with all measures and obligations relating to the implementation of the provisions of Part II of Law 4808/2021 concerning the prevention and handling of all forms of violence and harassment, including gender-based violence and harassment, as well as sexual harassment.

2. The purpose of this Policy is to create and maintain a working environment that respects, promotes, and safeguards human dignity and every person's right to a world of work free from violence and harassment. Our Company declares that it recognizes and respects every employee's right to a workplace free from violence and harassment and that it does not tolerate any such behavior, in any form, by any person.

3. This Policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and the relevant implementing regulations and applies to the persons referred to in paragraph 1 of Article 3 of Law 4808/2021, namely:

- Employees and workers of our Company, regardless of their contractual status, including those employed under dependent employment contracts, whether full-time, part-time, or rotational employment, and whether for a fixed or indefinite term.
- Persons engaged under contracts for work, independent service agreements, or salaried mandates.
- Persons engaged through third-party service providers, where applicable.
- Persons participating in training programs, including interns, apprentices, and volunteers, where applicable.
- Former employees whose employment relationship with the Company has ended.
- Individuals applying for employment.

4. The forms of violence and harassment referred to in the above paragraph (Section 3) may occur:

- In the workplace, including public and private spaces and locations where the employee performs work, receives remuneration, takes breaks, particularly for rest or meals, as well as in sanitary and personal care facilities, changing rooms, or accommodation provided by the employer.
- During commuting to and from work, other work-related travel, business trips, training activities, and work-related events and social activities.
- During work-related communications, including those carried out through information and communication technologies.

5. Through this Policy, the Company declares that it will apply a zero-tolerance policy towards all forms of violence, harassment, gender-based harassment, sexual harassment, workplace bullying and threats, insults and degrading treatment for any reason or cause, abusive language, and any similar conduct that may occur in the workplace or in connection with work. The Company also expresses its commitment to preventing, addressing, and eliminating such behaviors should they arise.

6. It is expressly and unequivocally stated that all forms of violence and harassment are prohibited when they occur during the course of employment, are connected with employment, or arise from employment, including gender-based violence and harassment and sexual harassment.

7. For the purposes of this Policy:

a) “Violence and harassment” means forms of behavior, acts, practices, or threats thereof that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, whether occurring as isolated incidents or repeatedly.

b) “Harassment” means forms of behavior that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or on any other discriminatory grounds.

c) “Gender-based harassment” means forms of conduct related to a person’s gender that have the purpose or effect of violating that person’s dignity and

creating an intimidating, hostile, degrading, humiliating, or offensive environment, in accordance with Article 2 of Law 3896/2010 (Government Gazette A' 107) and paragraph 2 of Article 2 of Law 4443/2016 (Government Gazette A' 232). Such conduct also includes sexual harassment as defined in Law 3896/2010, as well as conduct related to a person's sexual orientation, gender expression, gender identity, or sex characteristics.

d) "Sexual harassment" means any form of unwanted verbal, psychological, or physical conduct of a sexual nature that results in an infringement of a person's dignity, particularly by creating an intimidating, hostile, degrading, humiliating, or offensive environment around that person.

Some indicative examples of such prohibited and unacceptable conduct include: sexual insinuations; mockery; obscene, sexual, or racist jokes or comments; the use of offensive language; comments about a person's appearance or character that cause embarrassment or discomfort; stalking or persistent following; sending messages of a sexual nature by any means, including text messages, emails, social media platforms, other electronic or online applications, fax, or letter; offensive and persistent questions regarding a person's age, marital status, personal life, sexual interests or preferences, race, ethnicity, political beliefs, or religion; sexual gestures; persistent requests for dates or threats; suggestions that sexual favors may advance a person's career or that refusing a relationship may negatively affect career development within the Company; rude gestures; touching and any form of unwanted physical contact; spreading malicious comments or insulting a person on discriminatory grounds such as age, gender, marital status, civil partnership, pregnancy, maternity, disability, sexual orientation, religion, or beliefs; verbal threats or threatening gestures; insults made publicly or privately; belittling or ridiculing an individual or their abilities, whether privately or in the presence of others; angry outbursts directed at an individual; persistent or unreasonable criticism; cyberbullying; offensive messages, letters, or telephone calls; displaying or distributing offensive or sexually explicit material; acts of retaliation; isolating or refusing to cooperate with a colleague; and spreading malicious or defamatory rumors.

To avoid any misunderstandings and/or misinterpretations in the implementation of this Policy, which could lead to unnecessary or inappropriate disputes and negatively affect the smooth operation of the Company, it is clarified that, in principle, conduct falling within the scope of the employer's managerial authority

and the applicable legal framework shall not be considered acts of violence or harassment. This includes actions directly or indirectly related to the supervision and monitoring of the Company's employees, their productivity and effectiveness, their performance evaluation, and their overall work performance and presence.

A. POLICY FOR THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT AT WORK.

I) Assessment of Risks of Violence and Harassment in the Workplace.

The Company's primary objective is the prevention and elimination of all forms of violence and harassment in the workplace, as well as the effective handling of even suspicions of such incidents. For this reason, the Company shall incorporate psychosocial risks into its Occupational Risk Assessment Study, including risks associated with violence and harassment. In doing so, it shall take into account, among other factors, any inherent risks arising from the nature of the business activity, the specific job position, factors such as gender and age, or other characteristics that may constitute grounds for discrimination, as well as risks affecting specific groups of employees (such as night-shift workers and newly recruited employees).

For this assessment, digital occupational risk assessment tools may be used, including those available in Greece through the OiRA (Online Interactive Risk Assessment) platform of the **European Agency for Safety and Health at Work (EU-OSHA)**, accessible at <http://www.oiraproject.eu>.

II) Measures for the Prevention, Control, Mitigation and Management of Such Risks, and for Monitoring Such Incidents or Forms of Conduct.

The Company's measures and practices for the prevention, control, mitigation, and management of such risks, as well as for monitoring such incidents or forms of conduct, include the following:

A) Encouraging the maintenance of a working environment in which respect for human dignity, cooperation, and mutual support are fundamental values.

B) Maintaining open communication between employees and the Company's Human Resources Officer, management, immediate supervisors, and colleagues.

- C)** Establishing a procedure for the handling of reports and complaints.
- D)** Ensuring that employees receive the necessary training and information required to perform their duties, particularly in positions that present a higher risk of incidents of violence and harassment.
- E)** Providing assistance and access to any competent public, administrative, or judicial authority during the investigation of such incidents or conduct, whenever requested by those authorities.
- F)** Implementing actions aimed at raising employees' awareness of healthy behavioral standards (e.g., the avoidance of addictions), as well as issues concerning vulnerable categories of employees.
- G)** Providing employees with information regarding potential risks of violence and harassment in the workplace and the relevant prevention and protection measures, including the rights and obligations of both employees and the employer in relation to such incidents.
- H)** Training employees on procedures for handling incidents of violence and harassment.
- I)** Posting information in an accessible location within the workplace regarding the procedure for reporting and addressing such forms of conduct.

III) Information and Awareness-Raising Actions for Personnel.

The Company shall:

- A)** Organize targeted staff meetings for the discussion of relevant issues and the timely identification and management of potential risks.
- B)** Conduct seminars with mental health professionals, counseling service providers, representatives of voluntary organizations, and other relevant experts.
- C)** Encourage the participation of employee representatives and management personnel in training programs and educational seminars concerning the identification and management of risks related to violence and harassment in the workplace.

IV) Information on the Rights and Obligations of Employees and the Employer, as well as Persons Exercising Managerial Authority or Representing the

Employer, to the Extent of Their Responsibility, in the Event of the Occurrence, Reporting, or Complaint of Such Incidents, and on the Relevant Procedure.

Any employee, and in general any person (as referred to in paragraph 3 of the Preamble), who is affected by an incident of violence or harassment directed against them, even if the incident has not yet been formally reported or substantiated, shall have the right to seek protection and support through the procedures established by the Company and the applicable legal framework even if the employment relationship/contract under which the alleged incident or conduct occurred has ended, shall have the right to:

A) Seek judicial protection.

B) File a complaint with the Labour Inspectorate through the following contact details: Citizens' Service Hotline **1555**, or through its website at <https://www.sepe.gov.gr/>.

C) Submit a complaint to the Greek Ombudsman through the following contact details:

17 Halkokondyli Street, Postal Code 104 32, Athens, Greece

Tel.: (+30) 213 1306 600

E-mail: press@synigoros.gr

D) Contact the immediate psychological support and counselling service for women victims of gender-based violence through the **SOS Helpline 15900**.

E) Report or file a complaint regarding the incident or conduct within the Company, as provided for in Section/Chapter B of this Policy.

F) In accordance with paragraph 2 of Article 12 of Law 4808/2021, request that the Company take measures against the person complained of and/or take measures for the complainant's own protection.

G) Leave the workplace for a reasonable period of time, after informing the Company's responsible officers, without loss of pay or any other adverse consequence, provided that, based on a reasonable belief, there is an imminent and serious risk to their life, health, or safety, particularly where the necessary and appropriate protective measures have not been taken, or where the measures taken are insufficient to restore a peaceful working environment and stop the violent or harassing conduct.

In such a case, the employee leaving the workplace shall first inform the employer in writing, describing the incident of violence or harassment and the circumstances justifying their belief that a serious risk to their life, health, or safety is imminent. If the risk does not exist or has ceased to exist and the person referred to in paragraph 3 refuses to return to the workplace, the employer may apply to the Labour Inspectorate for the resolution of the dispute, as provided for in Article 18 of Law 4808/2021.

H) Claim before the competent courts full compensation from the person who caused the damage, including compensation for material losses, loss of profit, moral damages, and any other recoverable loss.

Obligations of Employees and Other Covered Persons.

Every employee, and in general every person covered by paragraph 3 of the Preamble, is required to:

A) Comply with this Policy for the protection of both themselves and all other persons working within the Company.

B) Promptly report any incident of violence or harassment to the designated reporting person/contact person (“liaison officer”) appointed under this Policy.

C) Cooperate in the event of an investigation of an internal (within the Company) report or complaint.

D) Participate in the Company’s training activities and programs concerning incidents of violence and harassment.

E) Refrain from engaging in any unwanted or prohibited conduct in the course of performing their duties.

F) Promptly inform the “liaison officer” (designated contact person) referred to in this Policy of any incidents of violence or harassment that have occurred within their area of work or responsibility.

G) Not obstruct or prevent any other person from exercising their rights and fulfilling their obligations as provided for under this Policy and the applicable legislation.

The Company undertakes to take all necessary, appropriate, and proportionate measures, on a case-by-case basis, against the person complained of, in order to prevent and avoid the recurrence of similar incidents or conduct.

V) Designated Contact Person (“Liaison Officer”).

The designated contact person (“liaison officer”) whom any employee may contact for guidance and information regarding the prevention and handling of violence and harassment in the workplace is the Company’s Human Resources Manager, **Ms. Aikaterini Kanti**.

The role of the designated contact person (“liaison officer”) is informational in nature and consists of providing guidance and information to employees, regardless of whether they approach the liaison officer in relation to an incident or complaint concerning violence or harassment.

The contact details of the designated contact person (“liaison officer”) are as follows:

Ms. Aikaterini Kanti

Telephone: +30 22414 40771

Postal Address: AMADA COLOSSOS RESORT Hotel, Rhodes–Kallithea Provincial Road, P.C. 85100, Rhodes, Greece

E-mail: hrm@amadacolossosresort.com

The designated contact person (“liaison officer”) is obliged to ensure the protection of **Personal Data** that may come to their knowledge in the performance of their duties.

The designated contact person may be replaced by decision of the Company’s Board of Directors.

VI) Protection of Victims of Domestic Violence

The Company protects employment and supports, through all appropriate means and reasonable accommodations, those employees covered by this Policy who are victims of domestic violence.

B. POLICY FOR THE MANAGEMENT OF INTERNAL COMPLAINTS REGARDING INCIDENTS OF VIOLENCE AND HARASSMENT IN THE WORKPLACE.

I) Responsible Persons and Communication Channels.

The person responsible for receiving and examining reports, complaints, and grievances concerning acts of violence and/or harassment, as defined in this Policy, as well as for informing the person against whom the complaint is made, is **Ms. Aikaterini Kanti**, the Company's Human Resources Manager.

Any employee who believes that they have been subjected to violence and/or harassment, as well as any employee who becomes aware of incidents of violence and/or harassment in violation of this Policy, may submit a written report or complaint through any of the following communication channels:

- **By post** to the following address:
AMADA COLOSSOS RESORT Hotel
Rhodes–Kallithea Provincial Road
P.C. 85100, Rhodes, Greece
- **By e-mail** to: **hrm@amadacolossosresort.com**
- **By hand-delivering a written complaint** to the responsible person: **Ms. Aikaterini Kanti**

All complaints and reports shall be handled with the utmost discretion and confidentiality and shall be stored in a secure location.

Upon receipt of a complaint, the responsible person shall inform the affected individual that, at any stage of the procedure followed within the Company, they have the right, at their discretion, to submit a complaint to the competent administrative authorities within the scope of their jurisdiction (namely the Labour Inspectorate and the Greek Ombudsman), as well as to the judicial authorities.

II) Temporary Measures in Favor of the Complainant & Investigation and Examination of Complaints.

A) Temporary Measures in Favor of the Complainant.

Where required by the circumstances and subject to agreement with the complainant/affected person, the Company shall promptly implement appropriate measures to protect them until the complaint has been fully investigated and finally examined.

Indicative measures, depending on the circumstances of the case, may include:

1. **Modification of working hours and work schedules** for the personnel involved.
2. **Transfer of the complainant** to another department or to another branch of the Company, where applicable, for a period to be mutually agreed upon.
3. **Remote working arrangements (teleworking)** for the complainant, provided that the nature of their duties allows such an arrangement.
4. **Granting paid leave** to the complainant.

B) Investigation and Examination of Complaints.

The Company is committed to ensuring that the submission of any complaint relating to this Policy will not be obstructed in any way. The Company further undertakes to promptly handle and investigate every such complaint impartially, with respect for human dignity, confidentiality, and compliance with personal data protection rules concerning the complainant, the respondent, witnesses, and any other persons involved. The Company shall also take immediate measures, where necessary, to protect the affected person.

All individuals involved in the investigation of a case (including the complainant, the respondent, and any employees or other persons who may be interviewed) are required to maintain confidentiality and discretion and to comply with all applicable personal data protection requirements regarding any information and data obtained during the examination and investigation of the matter.

The investigation and examination procedure shall commence immediately upon receipt of the complaint/report by the responsible person. The procedure shall be as follows:

1) Discussion Between the Responsible Person and the Complainant

Upon receipt of the complaint/report, the responsible person shall invite the complainant to a meeting no later than **five (5) working days** after receipt of the complaint in order to discuss the matter further. The complainant is required to attend this scheduled meeting.

The complainant, during the discussion, is required to further explain and elaborate on the alleged facts to the responsible person. The responsible person shall have the right to ask clarifying questions and receive answers from the

complainant in order to obtain a full understanding of the allegations. At the conclusion of the discussion, the complainant shall be required to submit in writing all clarifications relating to the matter and sign them.

The responsible person shall have the right, throughout the investigation process, to invite the complainant for additional discussions, following the same procedure described above. The complainant shall likewise have the right to be heard by the responsible person.

2) Summoning the Respondent for Information Regarding the Allegations and Submission of a Written Statement of Defense.

Upon completion of the collection of information from the complainant, the responsible person shall invite the respondent within **five (5) working days** in order to inform them of the allegations and request that they submit a signed written statement of defense within **five (5) working days**.

Following the submission of the respondent's statement, the responsible person shall invite the respondent to a discussion concerning the allegations. The respondent is obliged to answer truthfully regarding all facts within their knowledge. During the discussion, the responsible person shall have the right to ask clarifying questions and receive answers from the respondent in order to gain a complete understanding of the allegations. At the conclusion of the discussion, the respondent shall be required to submit in writing any additional clarifications concerning the matter and sign them.

The responsible person shall have the right, throughout the investigation process, to invite the respondent for further discussions, following the same procedure described above. The respondent shall likewise have the right to be heard by the responsible person.

The respondent's refusal to submit a written statement, unless justified by a serious and objective reason and consistent with the principle of good faith, shall be regarded as an admission by the respondent of the facts alleged against them.

Where the affected person claims to have been subjected to violence and harassment in accordance with this Policy, the provisions of paragraph 1 of Article 24 of Law 3896/2010 shall apply. In such cases, the respondent bears the burden of proving before the court or any other competent authority that no violence and/or harassment was committed against the affected person.

3) Hearing of Other Persons Involved.

As part of the investigation and examination of complaints, the responsible person shall have the authority and the right to invite for discussion any employee involved in the complaint, as well as any employee whom the responsible person considers capable of providing useful information relevant to the investigation.

All persons involved are required to attend the scheduled meeting with the responsible person. During the discussion, the involved persons must present to the responsible person all information known to them regarding the alleged facts. The responsible person shall have the right to ask clarifying questions and receive answers from the involved persons in order to obtain a complete understanding of the allegations. At the conclusion of the discussion, the responsible person shall prepare a written record of the matters examined, and each involved person shall be required to sign the record in their own handwriting as confirmation of its contents.

The responsible person shall have the right, throughout the investigation process, to invite involved persons for further discussions, following the procedure described above. Likewise, the involved persons shall have the right to be heard by the responsible person.

4) Collection of Evidence by the Responsible Person Through Access to Company Records

For the purpose of gathering evidence and information during the examination of a complaint, the responsible person may, subject to approval by the Company's Board of Directors, be granted access to Company records, audiovisual material, and any other appropriate means necessary for the verification of the allegations.

5) Collection and Examination of All Evidence, Information and Reports, and Comprehensive Briefing of the Company's Board of Directors

The responsible person is also required to fully inform the Company's legal representative of every complaint received and of any new evidence or information arising or becoming known in relation to any complaint.

The responsible person shall carry out and follow any procedure provided for under this Policy only after obtaining approval from the Company's legal representative.

The responsible person is also required, whenever requested, to provide the Company's legal representative and Board of Directors with a full and detailed report regarding any complaint.

III) Prohibition of Retaliation Against the Affected Person.

The termination of employment, the termination by any means of the legal relationship upon which employment is based, or any other adverse treatment of a person covered by Article 3 of Law 4808/2021 is prohibited and shall be null and void where it constitutes retaliatory conduct or a retaliatory measure within the meaning of Article 14 of Law 3896/2010 in response to an incident of violence or harassment as defined in Article 4 of Law 4808/2021.

However, the above prohibition is not intended to protect persons who intentionally submit false and/or malicious complaints. In such cases, the Company reserves the right to take any lawful measures against such persons, including, where appropriate, the termination of their employment contract or cooperation agreement.

IV) Consequences / Sanctions Following the Establishment of Violations.

In the event that the allegations concerning a violation of the Policy on Violence and Harassment at Work are confirmed, in whole or in part, the Company shall take the necessary, appropriate, and proportionate measures against the respondent, depending on the circumstances of the case, in order to prevent and avoid the recurrence of similar incidents or conduct.

Such measures may include, in particular:

- A verbal or written recommendation to comply with the Policy;
- A formal written reprimand;
- A change of position, working hours, workplace, or method of work performance;
- Temporary suspension from work for up to ten (10) days per calendar year;
- Termination of the employment relationship or cooperation agreement, subject to the prohibition of abuse of rights under Article 281 of the Greek Civil Code.

V) Cooperation and Provision of Relevant Information to the Competent Authorities.

The Company, as well as the responsible person entrusted with the examination and management of complaints under this Policy, undertake to cooperate with and provide information and evidence to any competent public, administrative, or judicial authority which, either ex officio or following a request by an affected person and within the scope of its authority, requests the provision of such information or evidence.

For this purpose, all information and evidence collected in any form shall be maintained in an appropriate file in accordance with the provisions of **Law 4624/2019** governing the protection and processing of personal data.

Sakellarios Soulounias

CEO