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**POLICY FOR COMBATING VIOLENCE
AND HARASSMENT AT WORK
AND POLICY FOR THE MANAGEMENT OF
INTERNAL COMPLAINTS FOR INCIDENTS OF
VIOLENCE AND HARASSMENT OF THE COMPANY
«G. AND E. KARAMOLEGKOS HOTEL TOURIST
AND COMMERCIAL S.A.»**

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PART A GENERAL PROVISIONS

1. Introduction

1. The company under the corporate name «G. AND E. KARAMELEGKOS HOTEL TOURIST AND COMMERCIAL ANONYMOUS COMPANY» (hereinafter **«KORD HOTELS»**) complies with all measures and obligations regarding the implementation of the provisions of Part II of Law 4808/2021 on preventing and combating 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 establish a working environment that respects, promotes, and ensures human dignity and the right of every person to a world of work free from violence and harassment. KORD HOTELS declares that it recognizes and respects the right of every employee to a work environment 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 regulatory legislation implemented pursuant to them.

2. Scope of Application

1. This policy applies to and concerns all employees and persons engaged by KORD HOTELS, regardless of their contractual status, including those employed under contracts for work, independent services, salaried mandates, persons employed through third-party service providers, as well as persons undergoing training, including interns and apprentices, volunteers, employees whose employment relationship has terminated, and persons applying for work.
2. The forms of violent behavior and harassment against any of the aforementioned persons may take place, in particular:
 - a) at the workplace, including public and private spaces and areas where the employee performs work, receives remuneration, takes a break, particularly for rest or meals, in personal hygiene and care facilities, changing rooms, or accommodation provided by KORD HOTELS.
 - b) during commutes to and from work, other movements, travel, training, as well as events and social activities related to work, and
 - c) during work-related communications, including those conducted through information and communication technologies.



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3. Definitions

For the purposes of this policy, the following definitions apply:

- a) «violence and harassment» means behaviors, acts, practices, or threats thereof, that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, whether manifested as a single occurrence or repeatedly,
- b) «harassment» means behaviors 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 gender-based harassment or harassment for other grounds of discrimination,
- c) «gender-based harassment» means behaviors related to a person's gender, which have the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment. These behaviors also include sexual harassment (as defined below), as well as behaviors related to a person's sexual orientation, gender expression, identity, or gender characteristics.
- d) «sexual harassment» means any form of unwanted verbal, psychological, or physical behavior of a sexual nature that aims at or results in violating a person's dignity, particularly by creating an intimidating, hostile, degrading, humiliating, or offensive environment around them.

4. Prohibition of violence and harassment at work

- 1. Every form of violence and harassment that manifests during work, is linked to it, or arises from it is prohibited, including gender-based, religious, racial, or sexual orientation violence and harassment, as well as sexual harassment.
- 2. Indicatively, the following are strictly prohibited, among others:
 - a) Comments involving content of a sexual nature or other malicious comments, when addressed to persons who have not explicitly expressed a desire to be the recipients of such comments
 - b) Comments or persistent questions about external appearance, gender, religion, race, or sexual orientation that cause shame or embarrassment
 - c) Distribution and/or display of material with sexual content and any other content offensive to human personality or dignity (e.g., photographic, digital, printed).
 - d) Unwanted comments with sexual innuendos
 - e) Sending messages with sexual content
 - f) Sexual gestures or acts (e.g., any unwanted physical contact aimed at assault or pressure to engage in sexual relations)
 - g) Persistent proposals for dates
 - h) Threats or insinuations that someone's sexual favors can advance their career or that refusing to engage in a sexual relationship can negatively affect their professional path in the company
 - i) Use of obscene, threatening, or offensive language, including cyberbullying
 - j) Obscene, threatening, violent, or offensive gestures
 - k) Coercion into sexual embraces or contact.
 - l) Belittling or ridiculing a person or their abilities, either privately or in front of others.



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PART B PREVENTING AND COMBATING VIOLENCE AND HARASSMENT AT WORK

1. Assessment of the risks of violence and harassment at work

The risks arising from violence and harassment at work can prove to be very serious, both for the employees and for the company itself.

More specifically, for employees, the risks include in particular:

- a) Violation of human dignity and infliction of moral damages
- b) Causation of anxiety, stress, anger, and fear during the performance of work
- c) Causation of psychosomatic symptoms (such as headaches, tachycardia and increased blood pressure, sleep disorders, etc.)

Concurrently with the employees, the company itself faces risks such as:

- Disruption of labor relations and of the smooth operation of the company
- Reduced productivity
- Legal and financial consequences
- Negative publicity

However, the measures to prevent, control, and limit the risks of violence and harassment at work, as well as to monitor and manage such incidents or behaviors, implemented by KORD HOTELS, along with the information and awareness-raising actions for its staff on issues of violence and harassment, combined with work organization methods, the nature of its business activity, and strict compliance with the applicable occupational health and safety legislation, contribute substantially to improving the protection level of employees and effectively addressing the related risks.

2. Measures for the prevention, control, limitation, and addressing of the risks of violence and harassment at work and for monitoring such incidents or forms of behavior

KORD HOTELS takes measures and implements administrative practices to prevent, control, limit, and address the risks of violence and harassment at work, as well as to monitor such incidents or forms of behavior. Indicatively, the aforementioned measures and administrative practices include the following:

- a) Adoption of a Policy for Managing Internal Complaints Regarding Incidents of Violence and Harassment, which is included herein (Part C), so that every complaint or relevant report is received, investigated, and resolved confidentially and in a manner that respects human dignity. KORD HOTELS may maintain an Incidents Log for the reported occurrences.



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- b) Designation of a reference person («liaison») to guide and inform employees regarding the prevention and addressing of violence and harassment at work.
- c) Encouragement to maintain a working climate where respect for human dignity, cooperation, and mutual assistance are core values.
- d) Technical measures, such as the provision of adequate lighting, etc.
- e) Training of employees on procedures for managing incidents of violence and ensuring that employees have the necessary training/information to perform their duties, especially in job positions that present a higher risk for the occurrence of violence and harassment incidents.
- f) Actions to raise employee awareness on healthy standards of behavior, as well as on issues concerning vulnerable categories of employees.
- g) Guidance and support to victims of violence and harassment for their reintegration into the workplace.
- h) Provision of assistance to any public, administrative, or judicial authority during the investigation of violence or harassment incidents, upon their request.
- i) Regular evaluation of the effectiveness of the implemented preventive and response measures, and revision/updating of the risk assessment and measures.
- j) Any other appropriate and recommended measure to achieve the purposes of this policy.

3. Actions for informing and raising awareness among staff on issues of violence and harassment

KORD HOTELS declares its zero tolerance for phenomena of violence and harassment and takes the following actions to raise awareness among its staff regarding these phenomena:

- a) provides hereby to its staff information and details regarding the risks of violence and harassment, as well as the related prevention and protection measures, the procedures in place at the company level, and the options provided by law in the event of such incidents.
- b) May organize targeted staff meetings to discuss relevant issues and address potential risks in a timely manner.
- c) May conduct seminars with mental health professionals or counseling service providers, etc.
- d) Encourages the participation of employees and management executives in training programs and educational seminars regarding the recognition and management of the risks of violence and harassment at work.



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4. Information on the rights and obligations of employees and KORD HOTELS in the event of the occurrence, reporting, or filing of a complaint regarding incidents, as well as on the relevant procedure.

Options available to persons affected by incidents of violence and harassment:

In the event that a person is affected by an incident of violence and harassment during access to employment, during their employment relationship or collaboration with KORD HOTELS, or even if their contract or employment relationship with KORD HOTELS, within the framework of which the incident or behavior is alleged to have occurred, has terminated, they have:

- a) the right to judicial protection,
- b) the right to appeal, file a complaint, and petition for the resolution of a labor dispute before the Labor Inspectorate, within the scope of its statutory powers,
- c) the right to submit a report to the Greek Ombudsman, within the scope of its statutory powers as the body responsible for promoting and supervising the principle of equal treatment, and
- d) the right to submit a report or complaint within KORD HOTELS in accordance with the intake and management procedure for complaints provided for in Part C of this policy. In any case, when a report or complaint regarding such behavior arises within KORD HOTELS, the affected person retains every right to appeal to any authority.

Furthermore, any person subject to this policy who suffers an incident of violence and harassment against them has the right to leave the workplace for a reasonable period of time, without deprivation of salary or other adverse consequences, provided that, in their reasonable belief, there is an imminent serious danger to their life, health, or safety. This applies particularly when the perpetrator of such behavior is a person exercising managerial authority or representing KORD HOTELS, or when KORD HOTELS fails to take the necessary and appropriate measures to restore labor peace, or when those measures are insufficient to stop the behavior of violence and harassment. In this case, the departing person is obliged to notify the Liaison of KORD HOTELS in writing beforehand, stating the incident of violence and harassment and the facts that justify their belief that a danger to their life, health, or safety is imminent. If the danger does not exist or has ceased to exist and the affected person refuses to return to the workplace, KORD HOTELS may appeal to the Labor Inspectorate requesting the resolution of the dispute, under the applicable provisions of Article 18 of Law 4808/2021, as amended.



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Contact details of the competent administrative authorities to which any affected person has the right to appeal

a) Labor Inspectorate (SEPE): The contact details of the Regional Directorates of Labor Relations Inspection are available at the following link:



<https://bit.ly/3WUWXgn>

Labor Inspectorate (SEPE) complaints hotline via the citizen service line: 1555

b) The Greek Ombudsman: 17 Chalkokondyli St., 10432 Athens, E-mail: press@synigoros.gr Tel.: (+30) 213 1306 600

c) Immediate psychological support and counseling service for women victims of gender-based violence: SOS Line 15900.

Consequences of non-compliance with this policy within the framework of the employment relationship: The provisions of Part C herein apply.

5. Designation of a reference person («Liaison»)

Ms. Eleni Tzanou (info@hotel-majestic.gr, tel. 6944764669) is designated as the reference person («Liaison») for the purposes of this policy. In this capacity, the Liaison is responsible for guiding and informing the persons subject to this policy regarding the prevention and addressing of violence and harassment at work, regardless of whether they are approached regarding a specific incident or complaint of violence and harassment or not. The responsibility of informing the Management rests upon the discretion of the Liaison. Furthermore, the Liaison is obliged to ensure the protection of Personal Data (PD) that may come to their knowledge during the execution of their role.

6. Protection of employment and support for employees who are victims of domestic violence by any appropriate means or reasonable accommodation.

KORD HOTELS, as a practical demonstration of its social responsibility against the phenomenon of domestic violence, may, upon request of an employee who is a victim of domestic violence, examine on a case-by-case basis—taking into account the nature of their duties and its organizational capabilities—the implementation of appropriate measures aimed at supporting the employee in retaining their job and smoothly reintegrating after such incidents, particularly in cases involving minor children or children with disabilities or serious illnesses (indicatively, the adoption of flexible working arrangements, etc.).



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PART C INTAKE AND EXAMINATION PROCEDURE FOR COMPLAINTS

1. Contact details for the intake of complaints

The following persons are designated as responsible for the intake, examination, and management of complaints or grievances filed by affected persons regarding behaviors of violence or harassment:

For the **Majestic Hotel**: Ms. Eleni Tzanou (manager@hotel-majestic.gr, tel. 6944764669)

For the **Kamari Beach Hotel**: Ms. Nitsa Georgiadou (manager@kamaribeach.gr, tel. 6943104335)

For the **Rose Bay Hotel**: Mr. Athanasios Roumpos (info@rosebay.gr, tel. 6944710948)

For the **Xenones Filotera**: Mr. Alexandros Tsamatos (info@xenonesfilotera.gr, tel. 6948463096)

In the event of any impediment, conflict of interest, suspicion of bias, or for any reason an inability to handle the matter by the aforementioned persons, Ms. Margarita Karamolegou (margarita@kordhotels.gr, tel: 6944765475) is designated as the alternate liaison for all of the above. Wherever reference is made to the liaison in this policy, the alternate Liaison is also included.

2. Investigation and examination of complaints with impartiality and protection of the confidentiality and personal data of the victims and the accused

KORD HOTELS and the Association commit to receive and not obstruct the receipt of, to promptly investigate and manage any complaint regarding an incident of violence or harassment, to investigate and examine the allegations with impartiality, objectivity, and respect for human dignity, as well as to take immediate measures to protect the affected person. In this context:

a) Persons submitting a complaint will be informed of the receipt of the complaint and, at regular intervals, of the progress of its examination. Upon completion of the investigation, KORD HOTELS will inform the complainant of the results of the investigation.

b) The Association, assisted—if it deems it appropriate or necessary—by the legal advisor and/or other competent executives of KORD HOTELS, proceeds to investigate the allegations, where it may use any appropriate means if it does not contravene the law and morality. Furthermore, if it deems it advisable or necessary, the Association informs the Management of KORD HOTELS (Board of Directors and/or Chief Executive Officer) about the complaint and the results of the relevant investigation.

c) If feasible, the Association attempts to resolve the incident in a conciliated manner before it escalates.



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d) To ensure labor peace and the integrity of the investigations, KORD HOTELS may, among other things, transfer the affected person or the accused, or modify their working hours, or the location or manner of providing their work, until the completion of the investigation.

e) During the examination of the complaint and for the verification of the allegations, the Association may have access to KORD HOTELS' records, audiovisual material collected by it, and other appropriate means for gathering information and evidence.

st) Prior to taking any measure or imposing any sanction, the Association calls upon the accused to present their defense, unless it reasonably judges that this is not required, either because it would put the affected person at risk, or because there is irrefutable evidence regarding whether or not the act constituting an incident of violence and harassment was committed, or for any other reason.

z) If the incident simultaneously constitutes an unlawful act and entails criminal or administrative sanctions, the Association cooperates with the authorities (including, but not limited to, judicial and prosecutorial authorities, the Labor Inspection Body [SEPE], the Greek Ombudsman, etc.).

i) KORD HOTELS and the Association commit to maintaining confidentiality and protecting Personal Data collected during the performance of the duties.

3. Prohibition of retaliation against the affected person.

KORD HOTELS commits to comply with the obligation to prohibit retaliation against affected persons, in accordance with Article 13 of Law 4808/2021 and the provisions of labor legislation. In this context, any adverse treatment of an affected person is prohibited, among other things, if it constitutes retaliatory behavior or a countermeasure against them due to the submission of a complaint regarding an incident of violence and harassment.

4. Consequences upon establishment of violations of this policy

In the event that it is established that an employee or an individual under another employment relationship at KORD HOTELS has violated the prohibition of violence and harassment, KORD HOTELS shall take against them the necessary, appropriate, and proportionate measures on a case-by-case basis, in order to prevent and ensure the non-recurrence of a similar incident or behavior. These measures may include:

a) a compliance recommendation,

b) the imposition of a disciplinary penalty, applying also the relevant provisions of the Company's Internal Labor Regulations and/or Code of Ethics & Conduct, as currently in force,

c) a change of position, working hours, location, or manner of work performance, on a temporary or permanent basis, or

d) the termination of the employment or cooperation relationship, without prejudice to the prohibition of abuse of rights under Article 281 of the Civil Code.



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Furthermore, in the event that a complaint is deemed to have been submitted maliciously, KORD HOTELS reserves the right to take any legal measures against the complainant within the framework of the employment or cooperation contract and the law.

5. Cooperation and provision of any relevant information to the authorities, upon request.

KORD HOTELS, the Association, and any other person responsible for receiving and managing complaints of violence or harassment cooperate with any competent public, administrative, or judicial authority which, either ex officio or upon request by an affected person, within the scope of its obligations, requests the provision of data or information, and they commit to provide assistance and access to said data. To this end, any data collected, in any format, are kept in a relevant file in compliance with the provisions of personal data protection legislation.



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PART D

FINAL PROVISIONS

This policy is communicated to all employees of KORD HOTELS by any appropriate means and is posted in the workplaces and on the company's website. This policy may be updated from time to time at the discretion of KORD HOTELS (including in the event of a change in the details of the persons responsible).