

REPORTING POLICY N.4808/2021

POLICY FOR THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE AND THE HANDLING AND MANAGEMENT OF INTERNAL COMPLAINTS FOR INCIDENTS OF VIOLENCE AND HARASSMENT OF THE COMPANY NAMED "OCCIDENTAL S.A." AND THE BRANCH "Astir Odysseus Kos Resort & Spa"

COMPANY – BRANCH:

"OCCIDENTAL S.A." - "Astir Odysseus Kos Resort & Spa"

EMPLOYER – LEGAL REPRESENTATIVE DETAILS:

Surname: SIAFAKAS

Name: AGGELOS

Father's Name: DIMITRIS

Tax Identification Number – Tax Office: 998922193 - FAE PIRAEUS

Address: AKTI MIAOULI 99, PIRAEUS

INTRODUCTION

The company "Occidental S.A.", based in Piraeus, at 99 Akti Miaouli Street, Tax ID 998922793 - Tax Office FAE Piraeus, General Commercial Registry No. 12168907000, and its branch, complies with all measures and obligations regarding the implementation of the provisions of part II of Law 4808/2021 for the prevention and handling of all forms of violence and harassment, including gender-based violence and sexual harassment.

1. PURPOSE OF THIS POLICY

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 individual to a world of work free from violence and harassment. Our company declares that it recognizes and respects the right of every employee to a work environment free from violence and harassment and does not tolerate any form of violence or harassment that occurs during work, is related to it, or arises from it, including gender-based violence and sexual harassment.

2. SCOPE OF APPLICATION – COVERED INDIVIDUALS

This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the enabling legislation issued under it. It applies to the individuals listed in paragraph 1 of article 3 of Law 4808/2021, including employees and workers, regardless of their contractual status, including those working under a contract of works, independent services, salaried mandate, those employed through third-party service providers, individuals undergoing training, including interns and apprentices, volunteers, individuals whose employment relationship has ended, job applicants, and other individuals who deal or collaborate with the company.

3. PROHIBITED BEHAVIOR – DEFINITIONS

A. Violence and Harassment

"Violence and harassment" mean forms of behavior, acts, practices, or threats thereof that aim to, lead to, or may lead to physical, psychological, sexual, or economic harm, whether occurring individually or repeatedly.

B. Harassment

"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 discrimination, including harassment based on gender or other discriminatory reasons.

C. Gender-Based Harassment

"Gender-based harassment" means forms of behavior related to a person's gender that have the purpose or effect of violating the person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, as per article 2 of Law 3896/2010 and paragraph 2 of article 2 of Law 4443/2016. These forms of behavior include sexual harassment as defined in Law 3896/2010, as well as behaviors related to sexual orientation, expression, identity, or characteristics.

D. Discrimination

"Discrimination" means different treatment of individuals arising from prejudice or interests, any act by which individuals are unjustifiably separated based on groups, classes, or other categories to which they belong or are considered to belong. Indicative examples include discrimination based on gender, age, language, nationality, race or ethnicity, disability, religious beliefs, or sexual orientation.

4. WHAT CONSTITUTES VIOLENCE AND HARASSMENT INCIDENTS

A. Incidents

Prohibited behaviors under this policy include, but are not limited to: insults based on discrimination such as gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices, threats, verbal or gestural insults, public or private humiliation, belittling or mocking an individual or their abilities, whether in private or in front of others, threatened or actual physical violence, persistent or unjustified criticism. Insulting, malicious, derogatory, obscene, or mocking comments and their dissemination, innuendos, sexist or racist jokes and comments, the use of offensive language, verbal sexual harassment or proposals, insinuations that someone's sexual favors can advance their career or that refusal to engage in sexual relations may negatively impact their career in the company, offering benefits (e.g., promotion or salary increase) in exchange for sexual favors, or creating an environment that promotes "sexual contact" as a means for professional development in the workplace, retaliation or threats of retaliation after rejecting sexual proposals. Cyberbullying, sending harassing and offensive messages via SMS, email, social media, fax, or letter, persistent or/and offensive questions about age, marital status, personal life, sexual orientation, as well as similar questions about race or ethnicity, including cultural identity and religion. Additionally, visual forms of harassment such as posters, cartoons, caricatures, photographs, or drawings that are derogatory based on legally protected characteristics. Unwanted physical contact such as touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, as well as any form of physical violence. Violation of privacy, intentional partial or total destruction of personal belongings, vehicles, or assets, interference or hindrance of normal work, movement, and physical integrity of the individual, physical exclusion or confinement, sexual gestures, physical stalking, and pursuit. The aforementioned acts are indicative and do not constitute an exclusive list of prohibited acts.

B. Permissible Behaviors

The following behaviors are not considered incidents of violence and harassment:

- Direct supervision of employees, including setting performance expectations.
- Taking measures to correct performance, such as placing an employee on a performance improvement plan.
- Assigning tasks and guidance on how and when they should be done.
- Requesting updates or progress reports.
- Approval or justified denial of leave.
- Requesting documentation for absence due to health reasons based on existing legislative provisions.
- Ethical or financial reward for excellent employee performance.
- Providing constructive feedback on work performance.

5. RETALIATION

The company also prohibits any employee or third party, in any way connected with it, from taking retaliatory actions against another employee or third party who opposes violence or any form of harassment, files a complaint, testifies, assists, or participates in any process of investigating an incident.

6. SCOPE OF APPLICATION – DEFINITION OF THE WORKPLACE

The workplace is considered a broader spatial context in which incidents of violence and harassment can occur. The above forms of behavior can take place in all the company's facilities where employees provide their services, as well as in places where employees take breaks for rest or food, in personal hygiene and care areas, locker rooms, or accommodations provided by the company to the staff. Furthermore, this policy covers all kinds of commutes to and from work, other commutes, trips, conferences, training, and social events and activities related to work or connected to the company's actions. Finally, it applies to all kinds of communications related to the company, including those conducted through information and communication technologies (e.g., emails, Zoom or Teams meetings, social media, etc.).

7. DOMESTIC VIOLENCE

All acts of physical, sexual, psychological, or economic violence that occur within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners and regardless of whether the perpetrator currently shares or previously shared the same residence with the victim. Domestic violence that takes place in the workplace, for example through physical violence, sexual harassment, and stalking by current or former partners, constitutes a serious form of workplace violence. Acts of domestic violence, including stalking, can also be committed by people who are in the same work environment with whom they have (or had in the past) close relationships. Domestic violence, in any of the aforementioned forms, exercised on the employee during telework.

8. RISK ASSESSMENT OF VIOLENCE AND HARASSMENT AT WORK

A. Evaluation and Improvement of Risk Factors

Our company conducts studies in collaboration with all its departments and relevant authorities to update the Occupational Risk Assessment. This is focused on potential risk factors depending on the nature and type of work provided, psychosocial risks, including risks of violence and harassment at work. The goal is to assess current working conditions and adjust them to minimize the chances of incidents of violence and harassment in the workplace. Examples of risk situations include: high stress in the workplace, isolated or closed workspaces, distribution of work positions, facility security and control, lack of appropriate training, individuals with a history of violent behavior, delivery of goods or services, individual or isolated work, working late at night or early morning hours, personal or domestic issues spilling over into the workplace.

B. Preventive Measures

Within its capabilities, the company takes all appropriate and necessary measures and makes reasonable adjustments to working conditions to both prevent and manage such incidents and behaviors.

9. PREVENTIVE MEASURES FOR INCIDENTS OF VIOLENCE AND HARASSMENT

The company informs staff and maintains prominently displayed contact information for the relevant administrative authorities to which any affected person has the right to appeal. These include:

- Seeking judicial protection
- Filing a complaint with the Labor Inspectorate within its legal competences
- Submitting a report to the Ombudsman within its legal competences
- Filing a complaint within the company, according to its complaint management policy

Contact details for relevant authorities are as follows: Ombudsman's Line: 213 13 06 600 (email: press@sinigoros.gr), Labor Inspection Line via citizen service line 1555 (email: helpdesk@sepenet.gr), SOS Line 15900 for immediate psychological support and counseling for women victims of gender-based violence.

The detailed procedures for submitting, managing, and internally investigating reports include the specific steps any complainant must follow, as well as the responsibilities of the company's bodies and the actions they must take to ensure effective management of such incidents. In any case, when a report or complaint of such behavior arises within the company, the affected person retains the right to appeal to any relevant authority. Any employee experiencing domestic violence that extends to the workplace can report it verbally or in writing to their supervisor so that the company can be informed and take appropriate and necessary measures. The company, within its capabilities, takes all appropriate measures and makes reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence. Additionally, it takes all necessary measures to inform and sensitize staff, using appropriate means, to combat violence and harassment, ensuring that everyone knows the company's policy and procedures regarding incidents of violence and harassment, where they can turn to in case of violence or harassment, and the legal options available to them.

10. PROCEDURE FOR SUBMITTING AND MANAGING INTERNAL COMPLAINTS – POINT OF CONTACT

Any employee subjected to any incident of violence and harassment can file an oral or written complaint with Mr. Aggelos Sifakas (Company President) or Mrs. Stergiani Kioutsiouki (Hotel General Manager), who is also designated as the "point of contact" for this policy. The complaint can be submitted in person or via email to aggsifakas@astirodysseuskos.gr or sk@astirodysseuskos.gr. Anonymous complaints are not accepted. The complaint must include the details of the accused, i.e., the person who exhibited a form of prohibited behavior, as well as specific incident(s) that constitute the behavior.

The point of contact thoroughly investigates each complaint and collects any necessary information related to it. Complaints and investigations remain strictly confidential to the greatest extent possible, considering the sensitivity of the case and the confidentiality of all involved parties. Specifically, the point of contact may interview the complainant and the accused, examine witnesses, request the submission of documents that may exist and prove whether any incident of violence and harassment occurred or not, and communicate with the supervisors of each department if the complainant addressed them.

The receipt, investigation, and management of complaints are conducted promptly and impartially, respecting human dignity and ensuring the confidentiality and protection of personal data of the victims and the accused collected during the exercise of these duties. Once the point of contact completes the investigation, they submit a written report to the company's management, outlining the investigation's results. The results are simultaneously communicated to both the complainant and the accused so that they are informed. The investigation must be completed, and the report submitted and communicated as soon as possible, and in any case, no later than three weeks from the date of the complaint submission by the complainant.

The company is committed to upholding the prohibition of retaliation, in accordance with Article 13 of Law 4808/2021 and the provisions of labor legislation. If an incident of discriminatory treatment, violence, harassment, or retaliation is substantiated, the company's management takes all necessary, appropriate, and proportionate measures against the accused. These measures may include, but are not limited to:

- Compliance recommendation
- Change of work position, schedule, location, and manner of work
- Termination of employment or cooperation with the company, subject to the prohibition of abuse of right under Article 281 of the Civil Code.

Complaints that are proven to be clearly malicious will be deemed inadmissible and further investigated at the company's discretion, both in terms of motives and involved parties, to restore order by any legal means and measures.

11. RIGHTS OF AFFECTED INDIVIDUALS

According to current legislation, any person experiencing an incident of violence and harassment has the right to leave the workplace for a reasonable period without loss of pay or other adverse consequences if they reasonably believe there is an imminent serious risk to their life, health, or safety, especially when the employer is the perpetrator of such behavior or when the necessary measures to restore workplace peace are not taken, or when such measures are insufficient to stop the behavior.

In this case, the departing person must inform the “point of contact” in writing beforehand, detailing the incident of violence and harassment and the facts justifying their belief that there is a serious risk to their life, health, or safety. Additionally, employees facing incidents of violence and harassment at work have the right to appeal to the competent authorities as provided by law (a. right to judicial protection, b. right to appeal and file a complaint and request for labor dispute resolution with the Labor Inspectorate within its legal competences, c. report to the Ombudsman within its legal competences, see above).

12. COOPERATION WITH ADMINISTRATIVE AND JUDICIAL AUTHORITIES

The company and any responsible person or service for receiving and managing such complaints at the corporate level cooperate with any relevant public, administrative, or judicial authority that either ex officio or upon request from the affected person, within its competence, requests the provision of data or information. They are committed to providing assistance and access to the data. For this purpose, any collected data, in any form, is kept in a relevant file in compliance with the provisions of Law 4624/2019 (A' 137) “Personal Data Protection Authority, measures for the implementation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data.”

13. CASES OF DOMESTIC VIOLENCE

The company takes, as far as possible, measures to protect the employment and support of employees who are victims of domestic violence. Any employee who has experienced domestic violence that extends to the workplace can report it verbally or in writing to their supervisor or the HR Manager to inform the company and take appropriate and necessary measures.

14. DEVIATIONS

Deviations from the application of this policy are not permitted. Employees seeking more information or having questions about this policy can contact their supervisor.