

POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT AT WORK

INTRODUCTION

Our company with the name "APOLLO TOURIST ENTERPRISES S.A.-APOLLO HOTEL", VAT number 094044487 DOU Rhodes, based in Faliraki Rhodes and legally represented for the signing of this document (prot. number: 2400572/8-7-2021 Registry Department/G.E.MI Service), by the Managing Director Vasilios Minaidis Ilias, resident of Rhodes, 49 Apodimon Street, Tax ID Number 002248720 DOU Rhodes, observes all the measures and obligations regarding the implementation of the provisions of part II of Law 4808/2021 on the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

PURPOSE OF THIS POLICY

Purpose of this policy The purpose of this policy is to create and consolidate a work environment that respects, promotes and ensures human dignity and the right of every person to a world of work free of violence and harassment. Our company declares that it recognizes and respects the right of every employee to a work environment free of violence and harassment and does not tolerate any form of violence and harassment that occurs in the course of work or is connected to it or arises from it, including violence and harassment due to gender and sexual harassment.

FIELDAPPLICATION

This policy is adopted in accordance with articles 9 and 10 of Law 4808/2021 and the delegated legislation and covers workers and employees, regardless of their contractual status. PARTICULARLY:

A. PREVENTING AND ADDRESSING VIOLENCE AND HARASSMENT

1. The company assesses the risks of violence and harassment at work, taking into account any inherent risk arising from the nature of the activity, the job position, factors such as gender and age or other characteristics that constitute grounds for discrimination, as well as risks concerning special groups of employees (e.g. newly hired, night workers).
2. The company takes measures to prevent, control, limit and deal with these risks, as well as to monitor such incidents or forms of behavior, demonstrating zero tolerance for violence and harassment, operating with confidentiality and respecting human dignity. Indicatively, the company encourages the maintenance of a working climate, where respect for human dignity, cooperation and mutual assistance are key values. It carries out actions to raise employees' awareness of healthy behavior patterns and issues concerning vulnerable categories of employees. It also takes measures of a technical nature in its facilities to prevent risks, such as e.g. adequate lighting of the premises. The company also provides,
3. The company undertakes actions to inform and raise awareness of the staff regarding the possible risks of violence and harassment in the workplace and the relevant prevention and protection measures for such incidents. As part of staff awareness, targeted meetings are organized to discuss relevant issues and address potential risks in a timely manner. The participation of management executives and employee representatives in training seminars on the recognition and management of risks of violence and harassment at work is also encouraged.
4. The company provides information on the rights and obligations of the employees and the employer, as well as the people who exercise it managerial right or represent the employer, to the extent and degree of their own responsibility, in the event of occurrence or reporting or reporting of such incidents, as well as for the relevant procedure for receiving and examining complaints. In particular, any person affected by an incident of violence or harassment during access to employment, during the employment relationship or even if the contract or employment relationship in the context of which the incident or behavior allegedly occurred has ended, has the following possibilities: 4.1) recourse to judicial protection, 4.2) submission of a complaint to the Labor Inspectorate within the framework of its statutory powers, 4.3) filing of a report with the Ombudsman within the framework of his statutory powers as well as 4.4) complaint within the company, in accordance with the complaint management policy. The contact details for the competent authorities are as follows: **Ombudsman Line: 213 13 06 600 (e-mail: press@sinigoros.gr), Labor Inspection Line via citizen service line 1555 (e-mail: helpdesk@sepenet.gr), SOS Line 15900 for immediate psychological support and counseling for female victims of gender-based violence.**
5. The company designates as a reference person ("link") at company level, responsible for guiding and informing employees about the prevention and treatment of violence and harassment at work the **Nikolaos Orange, Director Apollo Blue**, to which the employees can turn for the relevant issues (**phone 22410 87420** and email address **manager@apolloblue.gr**). The reporting person's role is informative and consists of guiding and informing employees, regardless of whether or not they come to them about an incident or complaint about an incident of violence and harassment. The reference person is obliged to protect the personal data that may come to his knowledge in the exercise of his role.
6. The company ensures the protection of employment and the support of working victims of domestic violence, as far as possible, by any appropriate means or reasonable adjustment, such as indicatively with flexible work arrangements following the request of an working victim of domestic violence.

B. COMPLAINT RECEIVING AND EXAMINATION PROCEDURE

1. The company guarantees secure and easily accessible communication channels for receiving and examining complaints and informing complainants and facilitates the relevant procedures. In particular, a competent person who will receive, examine and manage the complaints or complaints of the affected persons for violent or harassing behavior is defined as **Georgios Koliadis, Director Apollo Beach**. The relevant communication will be made at the e-mail address **manager@apollobeach.gr** or at the relevant complaints box in the entrance vestibule and exit of employees. In any case, the affected person will be informed, at any stage of the procedure followed within the company, of the possibility to also submit a complaint to the competent administrative authorities within their competence (Labor Inspectorate and Ombudsman) as well as to the judicial authorities of his choice.
2. The receipt, investigation and management of complaints is carried out promptly and impartially, in a manner that respects human dignity and ensuring the protection of the confidentiality and personal data of victims and complainants collected during the exercise of the above tasks.
3. The company undertakes to comply with the obligation to prohibit retaliation, in accordance with article 13 of Law 4808/2021 and the provisions of labor legislation.
4. In the event of a violation being found, the company takes the necessary, appropriate and proportionate measures against the complainant, in order to prevent a similar incident or behavior from happening again. These measures include, for example, the recommendation of compliance, a change of position, a change of hours, a change of place or method of providing work or the termination of the employment or partnership relationship, subject to the prohibition of the abuse of rights in Article 281 of the Civil Code.
5. The company and every person responsible for receiving and managing complaints undertake to provide their cooperation and assistance and any relevant information to the competent public, administrative and judicial authorities, if requested by them, which they keep in a relevant file in compliance with the provisions of Law 4624/2019.

ΤΟΥ ΠΡΟΪΣΤΗΤΗ ΕΠΙΧΕΙΡΗΣΙΑΣ ΑΠΟΛΛΩΝ Α.Ε.
For the company
ΕΠΙΧΕΙΡΗΣΙΑΣ ΑΠΟΛΛΩΝ
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