

POLICY ON THE PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT AT WORK

AND ON THE HANDLING OF INTERNAL COMPLAINTS

This policy is issued in compliance with Articles 58–69 of the Labour Law Code (P.D. 62/2025) and Ministerial Decision 95/2026 (Government Gazette B' 1/08.01.2026) on the model policy for combating violence and harassment at work.

Article 1 — Purpose and Scope

The company Apollon Tourist Enterprises S.A., VAT No. 094044487 (hereinafter “the Company”), declares expressly and with absolute clarity that it does not tolerate any kind of violence, harassment or sexual harassment in the workplace. Any such behaviour is expressly prohibited and entails serious consequences.

This policy applies to all persons employed by or cooperating with the Company, regardless of the legal form of their relationship:

- Employees under an employment contract (indefinite or fixed-term, full-time or part-time)
- Employees through temporary employment agencies — they are also counted towards the 20-person threshold
- Trainees, apprentices and volunteers
- Job applicants (during the recruitment/interview stage)
- Contractors under a contract for independent services or for work
- Former employees, where the incident is connected to a previous employment relationship

The policy covers behaviour that occurs:

- In the workplace (offices, warehouses, production areas, sanitary facilities, changing rooms, etc.)
- During teleworking and any form of remote work
- While commuting to and from work, as well as on business trips
- At company events, training sessions and work-related social activities
- In communications via email, telephone, chat applications (Teams, Slack, etc.) and social media

Article 2 — Definitions

In accordance with Articles 59 and 60 of P.D. 62/2025, the following definitions apply:

a) Violence and Harassment

Forms of behaviour, acts, practices or threats thereof, which aim at, result in or are likely to result in physical, psychological, sexual or economic harm, whether occurring once or repeatedly.

b) Harassment (Moral Harassment / Mobbing)

Forms of behaviour whose purpose or effect is to violate the dignity of a person and to create an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether they constitute a form of discrimination.

c) Gender-Based Harassment

Forms of behaviour connected to a person's sex whose purpose or effect is to violate their dignity and create a hostile or humiliating environment. This includes behaviour connected to sexual orientation, gender expression, gender identity or sex characteristics.

d) Sexual Harassment

Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, whose purpose or effect is to violate the dignity of a person, in particular by creating an intimidating or humiliating environment.

Indicative forms of prohibited behaviour:

- Physical violence or the threat of physical violence
- Verbal attacks, insults, derogatory comments and offensive jokes
- Systematic belittling, unjustified criticism and devaluation of work
- Social exclusion, ignoring, deliberate isolation of an employee
- Unwanted comments, gestures or contact of a sexual nature
- Sending offensive material via email, messages or social media
- Cyberbullying — harassment through digital media
- Threats to a person's job or career progression for refusing sexual favours

Article 3 — Employer Obligations

The Company, in compliance with Articles 61 and 62 of P.D. 62/2025, undertakes the following obligations:

3.1 Risk Assessment

The Company incorporates the risks of violence and harassment into the Occupational Risk Assessment, in accordance with the Code of Laws on Health and Safety at Work (Law 3850/2010) and Articles 507–508 of P.D. 62/2025, taking into account factors such as interactions with customers, work in isolated environments, working hours and the hierarchical structure.

3.2 Staff Information and Awareness

The Company is obliged to inform all staff about:

- The content of this policy and their rights
- The forms of violence and harassment that are prohibited
- The complaint submission procedure and the contact details of the Complaints Officer
- The competent authorities they may turn to

Information is provided upon hiring and repeated at least annually.

3.3 Training of Managers

Managers with supervisory duties receive specialised training in recognising and preventing violence and harassment, as well as in handling complaints properly.

Article 4 — Procedure for Receiving and Examining Complaints

4.1 Complaints Officer

The following person is appointed as Complaints Officer (CO):

Full Name:	Christos Saffianis
Capacity / Position:	Personnel Manager
Email:	hr@apollohotels.gr
Telephone:	2241085535 (extension 7035)
Alternate person:	Georgios Koliadis

The CO receives training in handling complaints, is obliged to maintain absolute confidentiality and to act impartially.

4.2 Ways of Submitting a Complaint

Any affected person may submit a complaint:

- In writing (in hard copy or electronic form) to the Complaints Officer
- Orally — in which case the CO draws up written minutes signed by the complainant
- Anonymously — anonymous complaints are accepted and examined to the extent possible

4.3 Examination Stages

Stage 1 — Receipt: The CO receives the complaint and acknowledges receipt within 3 working days.

Stage 2 — Preliminary Assessment: The seriousness of the incident is assessed. In urgent cases, interim protective measures are taken immediately.

Stage 3 — Investigation: A confidential investigation is carried out. The complainant, the person complained against and any witnesses are heard. The procedure is completed within 30 calendar days.

Stage 4 — Decision: Management makes a decision based on the findings and informs the parties involved.

Stage 5 — Follow-up: After the decision is issued, the CO monitors the situation to ensure that the problem does not recur.

4.4 Confidentiality

All persons involved in the complaint examination procedure are obliged to maintain absolute confidentiality. The complainant's details are not disclosed without their consent. Personal data are processed in accordance with the GDPR (EU 2016/679) and Law 4624/2019.

Article 5 — Protective Measures and Consequences of Violations

5.1 Measures to Protect the Affected Person

Where a violation is established, or during the investigation, the Company may immediately take the following measures to protect the affected person:

- Temporary change of position, working hours or manner of work
- Granting leave to allow the situation to be resolved
- Provision of psychological support
- Any other appropriate measure depending on the circumstances

5.2 Disciplinary Consequences for the Person Complained Against

Where a violation is established, the Company imposes sanctions according to the seriousness of the incident:

- Written warning to comply
- Mandatory participation in training
- Change of position, working hours or place of work
- Suspension of bonuses or any additional remuneration
- Termination of the employment or cooperation contract (in serious cases), in accordance with Articles 65 and 66 of P.D. 62/2025

Important: Under Article 65(2) of P.D. 62/2025, when an employee breaches the prohibition of violence and harassment, the employer is obliged to take the necessary measures to prevent a similar incident from recurring.

Article 6 — Prohibition of Retaliation

Any adverse treatment, sanction or retaliation is strictly prohibited against:

- A person who has filed a complaint of violence or harassment
- A person who has testified as a witness during an investigation
- An employee representative who has supported an affected person

This prohibition is expressly established in Article 66 of P.D. 62/2025. Any retaliation is treated as a separate disciplinary offence.

Article 7 — Competent Authorities and Contact Details

The Company communicates to all staff the following contact details, which are posted in a prominent place in the workplace:

Body	Contact Details
Labour Inspectorate (SEPE)	Citizens' helpline: 1555 www.hli.gov.gr
SOS Line — Gender-Based Violence	SOS telephone line: 15900 (24-hour operation)
Greek Ombudsman	210 7289600 www.synigoros.gr
Public Prosecutor	In cases of a criminal nature — competent Public Prosecutor's Office of the Court of First Instance

Article 8 — Rights of Affected Persons

In accordance with Articles 65–68 of P.D. 62/2025, every affected person has the right:

- To submit an internal complaint to the CO without fear of retaliation
- To leave a dangerous or humiliating situation, informing their supervisor or the CO immediately
- To request a change of position, working hours or place of work
- To apply to the Labour Inspectorate (SEPE) or the Greek Ombudsman
- To claim compensation for moral damage or mental distress before the competent Court
- To terminate the employment contract, treating the violence/harassment as serious cause, and to claim severance pay

Reversal of the burden of proof: Under Article 68 of P.D. 62/2025, when the complainant invokes facts that justify the violation, the burden of proving that the prohibition was not breached shifts to the employer or employee complained against.

Article 9 — Employee Obligations

Every employee is obliged:

- To respect the dignity of all colleagues, partners, customers and visitors
- To refrain from any form of behaviour falling within the prohibitions of this policy
- To inform the CO or Management if they become aware of an incident of violence or harassment
- To cooperate during any investigation and to maintain confidentiality

Article 10 — Policy Review

This policy is reviewed:

- Regularly — at least once every two (2) years
- Extraordinarily — in the event of a change in legislation, a significant change in the composition or structure of the business, or after a serious incident

Any amendments are communicated immediately to all staff.

Management Commitment Statement

The Company's Management expressly declares its commitment to the full implementation of this policy, to creating a safe and dignified working environment, and to complying with every relevant legal obligation.

Records

CODE	TITLE	STORAGE METHOD		RETENTION PERIOD	RESPONSIBLE FOR KEEPING
		FORM	ELECTRONIC		
E QS-P-00-9-1	COMPLAINT FORM — VIOLENCE & HARASSMENT AT WORK	✓	✓	At least 3 years	Complaints Officer

The Legal Representative

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ΞΕΝΟΔΟΧΕΙΟ ΑΠΟΛΛΩΝ
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