



ANTI-DISCRIMINATION POLICY, OF VIOLENCE AND HARASSMENT AT WORK

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1. PURPOSE

The purpose of the policy is to prevent and combat any form of discrimination based on personal characteristics and choices as well as any violence and harassment that occurs during work, whether connected to it or resulting from it.

2. SCOPE

Management and members of LVL A.E. group companies. ("Group"), employees with a contract of dependent work, service providers with wage contracts of mandate, project, independent services and temporary employment, employed through third party service providers, practical trainees and apprentices, employees whose employment relationship with a Group company has ended, prospective employees in a Group company, other people who do business or cooperate with the Group.

3. DECLARATION OF ZERO TOLERANCE TO DISCRIMINATION, VIOLENCE AND HARASSMENT – RISK ASSESSMENT

The LVL A.E. Group of Companies ("Group") expresses its commitment to address and eliminate discrimination, violence and harassment in the workplace, with the aim of ensuring a working environment where respect for human dignity prevails and discrimination on the basis of personal characteristics will not be allowed and options.

It is expressly and unequivocally stated that any form of discrimination, violence and harassment that occurs during work, whether connected to it or resulting from it, is strictly prohibited.

By way of example and not limitation, the Group declares that innuendo, mockery, obscene, sexual or racist jokes or comments, the use of offensive language, comments about someone's appearance or character, which cause embarrassment or embarrassment, are strictly prohibited. stalking, stalking and unwanted verbal or physical attention towards someone, sending sexually explicit messages via SMS, e-mail, social media, fax or letter, asking insulting and persistent questions about someone's age, marital status , his personal life, his sexual interests or preferences, and similar questions about his race or nationality, including his cultural identity and religion, sexual gestures or persistent dating suggestions or threats, insinuations that sexual someone's favors can advance his career or that the refusal to enter into a sexual relationships can negatively affect his professional career at the hotel,



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rude gestures, touching and any kind of unwanted physical contact, spreading malicious comments or insulting someone mainly due to discrimination on age, gender, type of marriage, cohabitation agreements, pregnancy and maternity, any disability, sexual his preferences, religion or beliefs, threatening verbally or with gestures, cursing in public or in private, belittling or ridiculing a person or his abilities, whether in private or in front of others, outbursts of anger against someone , persistent or unwarranted criticism, exclusion from social events, work group meetings, discussions and collective decisions or planning, cyberbullying, abusive emails, letters and phone calls.

The Group is committed to receiving, investigating and managing any relevant complaint, demonstrating zero tolerance for discrimination, violence and harassment, with confidentiality and respect for human dignity. It also undertakes not to obstruct the receipt, investigation and management of such complaints.

The Group undertakes to provide assistance and access to any competent public, administrative or judicial authority, during the investigation of any incident of violence and harassment.

For employees and those connected in any way with the Group who violate the obligations arising from this Policy, the necessary appropriate and proportionate measures are taken, as the case may be, in order to prevent and prevent a similar incident or behavior from recurring.

In order to combat discrimination, violence and harassment, the Group has created a comprehensive mechanism for submitting, managing and investigating reports, with the establishment of special reporting channels and the creation of a network of Policies and Procedures.

Specifically, the Reporting and Internal Investigation Reporting Policies reflect the principles of the Group, with which it ensures both the prevention and resolution of issues of violence and harassment at work.

The individual Reporting, Management and Internal Investigation Procedures include the detailed steps any complainant must take, as well as the responsibilities of the Group's bodies and the actions they must take to ensure the effective management of relevant incidents.



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1. DEFINITIONS

1.1. Discrimination

Discrimination means discrimination based on sex, race, colour, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health condition, age or sexual orientation.

1.2. Violence and Harassment

Violence and Harassment are the forms of behavior, actions, practices or threats thereof, which are intended, lead or may lead to physical, psychological, sexual or financial harm, whether manifested individually or repeatedly.

Harassment also constitutes forms of behavior that have as their purpose or result the violating the dignity of the person and creating an intimidating, hostile, degrading, humiliating or aggressive environment, regardless of whether they constitute a form of discrimination, and include harassment based on gender or on other grounds of discrimination.

Harassment prohibited by this policy includes, but is not limited to:

- Verbal harassment, including e.g. abusive comments, insult or accusation.
- Physical harassment, including e.g. of physical interference with normal work or movement.
- Visual forms of harassment, e.g. posters, cartoons, cartoons, photographs or designs that are derogatory based on characteristics protected by law.
- Retaliation or intimidation for reporting or threatening to report any of the aforementioned forms of harassment or for cooperating with an investigation of a harassment incident.

1.3. Gender Harassment & Sexual Harassment

Gender-based harassment is any form of behavior linked to a person's gender that has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. These forms of behavior include sexual harassment, as well as forms of behavior linked to a person's sexual orientation, expression, identity or gender characteristics.

In particular, sexual harassment is defined as unwanted behavior of a sexual nature, including unwanted sexual proposals, requests for sexual favors and any other unwanted physical or verbal act of a sexual nature. Such conduct may be expressed by a person of any gender and includes harassment of a person of any gender.



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For illustrative purposes, some examples of sexual harassment are as follows:

- Offering benefits (eg, promotion or salary increase) in exchange for sexual favors or creating an environment that promotes "sex" as a means of professional development in the workplace.
- Retaliating or threatening to retaliate after rejecting sexual advances.
- Visual Conduct: obscene gestures, display of sexually offensive graphic materials in electronic and printed form (e.g., e-mail, voice mail, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual innuendo.
- Verbal behavior: derogatory comments, sexual innuendos, use of sexual "language" or "jokes" of sexual content.
- Verbal sexual harassment or suggestions.
- Verbal abuse of a sexual nature: sexual comments about a person's body, use of sexually derogatory comments in describing a person, sexually suggestive or obscene comments in chat, letters, invitations, notes or other comments, epithets.
- Physical contact: touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, etc.

The above acts are indicative and do not constitute an exclusive list of prohibited acts. The employee or third party who engages in such prohibited conduct should and will bear full responsibility for their actions.

1.1. Retaliation

The Group also prohibits any employee or third party, in any way connected with it, from retaliating against another employee or third party who opposes violence or any form of harassment, files a complaint, files a report, assists or participates in any proceeding incident investigation.



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2. MEASURES FOR THE PREVENTION, CONTROL AND LIMITATION OF RISKS – INFORMATION & AWARENESS ACTIONS

All employees and those connected in any way with the Group must comply with this policy.

The policy applies both in workplaces and in places related to corporate or group meetings, conferences and work-related events, whether on the Group's premises or outside, whether in person or online or by phone.

The Group ensures an accessible, safe and friendly working environment where relations between employees, partners, Management and members of its companies are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.

The Group, within the framework of its capabilities, takes every appropriate measure and makes every reasonable adjustment to working conditions to protect employment and support employees - victims of domestic violence.

The Group takes all the necessary measures to inform and raise awareness of the staff, using the appropriate means (eg printed and electronic material, etc.) to combat violence and harassment, ensuring that everyone is aware of the Group's policy and procedures in relation to incidents of violence and harassment and knows where to turn in the event of violence or harassment.

The Group encourages its executives to recognize discrimination, violence and harassment at work and to provide the necessary support to its staff and partners.

The Group encourages its employees and any third party associated with it in any way to report incidents of discrimination, violence and harassment in the workplace that they happen to witness.

1. REPORTING, INVESTIGATING AND RESOLVING COMPLAINTS

If any employee of the Group or a third party associated with it in any way believes that they have been subjected to discrimination, violence or any form of harassment, or if they have found that such behavior is taking place in the work environment, they should follow the steps of the Reporting Process to report the incident.

The Group treats with absolute confidentiality and discretion the management of all incidents of complaints of discrimination, violence and harassment.

Persons who have submitted reports will be informed of the receipt of the report and at regular intervals of the progress of the review of their report, in accordance with the Report Management Process. Upon completion of the investigation, the Group will communicate the results of the investigation as soon as practicable and appropriate.



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If any employee of the Group or a third party associated with it in any way believes that they have suffered retaliatory behavior as a result of filing a complaint or providing assistance in the process of investigating incidents of discrimination, violence and/or harassment, they must follow the procedure described in the Policy Group Reports to report the retaliation incident in question immediately.

Complaints of conduct in violation of this policy will be accepted in writing, by name or anonymously, in accordance with the reporting policy and will be promptly and thoroughly investigated.

To maintain workplace safety and the integrity of investigations, the Group may, among other things, move employees or modify their work hours pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be permitted.

If the result of the investigation shows that an incident of discrimination, violence or harassment or retaliation has taken place, the Group will take appropriate corrective, disciplinary and/or other actions against the offender.

These actions may include (indicative and not limited): (a) disciplinary sanctions, (b) change of position, time, place or method of providing the work, (c) termination of employment contract or partnership agreement, (d) legal actions.

In any case, the offender may also be subject to criminal or civil liability, according to current legislation.

This Regulation applies in parallel with the existing general legislation for the protection of the employee's personality and does not affect his legal rights at the level of civil and criminal legislation, but also the rights to submit a Complaint before the competent Auditing Authority.

2. MALICIOUS CLAIMS

Complaints that prove to be clearly malicious will be considered unacceptable and will be further investigated at the discretion of the Club, both in terms of motives and those involved, in order to restore order by any legal means and means.

3. FURTHER INFORMATION – CONTACT PERSONS

All questions related to the implementation or interpretation of this policy should be submitted to the Director, who is designated as the competent person (Point of Reference) for the information and advisory guidance of staff as well as for issues related to prevention and addressing workplace violence and harassment.

4. CHANGE HISTORY TABLE

Έκδοση	Ημερομηνία	Περιγραφή Μεταβολών
1.0	04/2022	Έκδοση