

**TABLE OF CONTENTS**

1. PURPOSE ..... 2  
 The aim of the policy is to prevent and combat all forms of discrimination based on personal characteristics and choices, as well as any violence and harassment occurring at work, whether related to or resulting from it2

2. SCOPE ..... 2  
 Management and members of XENOS HOTELS & RESORTS, employees with a contract of dependent employment, service providers with contracts of paid mandate, work, independent services and temporary employment, employed through third party service providers, trainees and apprentices, employees whose employment relationship with company t has ended, candidate employees in a company of the hotel, other persons who deal or cooperate with the Hotel.

3. DECLARATION OF ZERO TOLERANCE for DISCRIMINATION, VIOLENCE and HARASSMENT - ----  
 RISK ASSESSMENT ..... 2

4. DEFINITIONS ..... 3

4.1. DISTINCTIONS ..... 4

4.2. VIOLENCE AND HARASSMENT ..... 4

4.3. GENDER HARASSMENT & SEXUAL HARASSMENT ..... 5

4.4. RETALIATION ..... 6

5. MEASURES TO PREVENT, CONTROL AND REDUCE RISKS – INFORMATION & AWARENESS ----  
 ACTIONS ..... 6

6. REPORTING, INVESTIGATING AND DEALING WITH COMPLAINTS ..... 7

7. MALICIOUS COMPLAINTS ..... 8

8. FURTHER INFORMATION – REFERENCE PERSONS ..... 8

9. CHANGE HISTORY TABLE ..... 8

10. DASHBOARD OF CHECKS AND APPROVALS ..... 9

## **1. PURPOSE**

The aim 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 related to it or resulting from it.

## **2. SCOPE**

Management and members of XENOS HOTELS & RESORTS, employees with a dependent employment contract, service providers with contracts of remunerated mandate, work, independent services and temporary employment, employed through third-party service providers, trainees and apprentices, employees whose employment relationship with a Group company has ended, candidate employees in a Group company, other persons who deal or cooperate with the Hotel.

## **3. DECLARATION OF ZERO TOLERANCE FOR DISCRIMINATION, VIOLENCE AND HARASSMENT – RISK ASSESSMENT**

XENOS HOTELS & RESORTS expresses its commitment to address and eliminate discrimination, violence and harassment in the workplace, in order to ensure a working environment where respect for human dignity prevails and discrimination based on personal characteristics and choices will not be allowed.

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

Indicatively and not restrictively, the Hotel 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 shame or embarrassment, stalking, stalking and unwanted verbal or physical attention towards a person are strictly prohibited, sending sexually explicit messages via SMS, e-mail, social media, fax or letter, insulting and persistent questions about someone's age, marital status, personal life, sexual interests or preferences, as well as similar questions about their race or ethnicity, including their cultural identity and religion; sexual gestures or persistent suggestions for dating or threats, insinuations that someone's sexual favors can advance one's career or that refusing to enter into a sexual relationship may adversely affect one's career path at the hotel, rude gestures, touches and any kind of unwanted physical contact, spreading malicious comments or insulting someone primarily because of age discrimination; gender, type of marriage, civil partnerships, pregnancy and maternity, any disability, sexual orientation, religion or belief, verbal or gesture threats, swearing in public or in private, belittling or mocking a person or his abilities, either in person

Either privately or in front of others, outbursts of anger against someone, persistent or unjustified criticism, exclusion from social events, group meetings, work, discussions and collective decisions or planning, cyberbullying, offensive emails, letters and phone calls.

XENOS HOTELS & RESORTS is committed to receiving, investigating and handling any relevant complaint, showing zero tolerance to discrimination, violence and harassment, with confidentiality and respect for human dignity. It also undertakes not to obstruct the receipt, investigation and handling of such complaints.

XENOS HOTELS & RESORTS is committed to providing assistance and access to any competent public, administrative or judicial authority in the investigation of any incident of violence and harassment.

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

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

Specifically, the Reporting and Internal Investigation Policies reflect the Group's principles, which ensure 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 that 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.

## **4. DEFINITIONS**

### **4.1. Discrimination**

Discrimination is defined as discrimination based on sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political opinions, disability or health status, age or sexual orientation.

### **4.2. Violence and Harassment**

Violence and Harassment are the forms of behavior, acts, practices or threats thereof, which aim, lead or are likely to lead to physical, psychological, sexual or economic harm, whether they occur individually or repeatedly.

Harassment is also conduct which has the purpose or effect of violating the dignity of the person and of creating an intimidating, hostile, degrading, humiliating or offensive environment, whether or not it constitutes a form of discrimination, and includes harassment based on sex or on other grounds of discrimination.

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

- Verbal harassment, including e.g. abusive comments, insults or accusations.
- Physical harassment, including e.g. physical interference with normal work or movement.
- Visual forms of harassment, e.g. posters, cartoons, cartoons, photographs or drawings that are derogatory based on features protected by law.
- Retaliation or intimidation in the event of reporting or threatening to report any of the aforementioned forms of harassment or to cooperate in the investigation of a harassment incident.

#### **4.3. Gender harassment & Sexual harassment**

Gender-based harassment is conduct related to a person's sex that has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. Such conduct includes sexual harassment as well as conduct related to a person's sexual orientation, expression, gender identity or sex characteristics.

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

For illustrative purposes, some examples of sexual harassment are:

- Offering benefits (e.g. promotion or pay raise) in exchange for sexual favours or creating an environment that promotes "sexual intercourse" as a means to professional development in the workplace.
- Retaliation or threat of retaliation after rejection of sexual advances.
- Visual Behavior: obscene gestures, displaying sexually offensive electronic and printed graphic materials (e.g., e-mail, voicemail, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual insinuations.
- Verbal behavior: derogatory comments, sexual innuendo, sexual use '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 a person's description, sexually suggestive or obscene comments in conversation, letters, invitations, notes or other comments, adjectives.

XENOS HOTELS & RESORTS POLICY  
TO COMBAT DISCRIMINATION,  
VIOLENCE AND HARASSMENT AT WORK

- 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 behavior should and will bear full responsibility for his actions.

## **5. RETALIATION**

XENOS HOTELS & RESORTS also prohibits any employee or third party, in any way connected with him, from taking retaliatory actions against another employee or third party, who opposes violence or any form of harassment, submits a complaint, testifies, assists or participates in any incident investigation process.

## **6. RISK PREVENTION, CONTROL AND MITIGATION MEASURES – INFORMATION & AWARENESS-RAISING ACTIONS**

All employees and persons connected in any way with the Hotel must comply with this policy.

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

XENOS HOTELS & RESORTS ensures an approachable, safe and friendly working environment where relations between employees, partners, Management and members of its companies are distinguished by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.

XENOS HOTELS & RESORTS, within the limits of its capabilities, takes all appropriate measures and makes every reasonable adjustment of working conditions to protect employment and support employees - victims of domestic violence.

XENOS HOTELS & RESORTS takes all necessary measures to inform and sensitize the staff, using the appropriate means (e.g. printed and electronic material, etc.). to combat violence and harassment by ensuring that everyone is aware of the Group's policy and procedures towards incidents of violence and harassment and knows where to turn in case of violence or harassment.

XENOS HOTELS & RESORTS encourages its executives to recognize discrimination, violence and harassment at work and to provide the necessary support to its staff and partners.

XENOS HOTELS & RESORTS encourages its employees and any third party connected in any way with them to report incidents of discrimination, violence and harassment in the workplace that they happen to witness.

## **7. REPORTING, INVESTIGATING AND DEALING WITH COMPLAINTS**

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

XENOS HOTELS & RESORTS treats with absolute confidentiality and discretion the management of all incidents of reporting discrimination, violence and harassment.

The persons who have submitted petitions will be informed of the receipt of the petition and at regular intervals of the progress of the examination of their petition, in accordance with the Petition Management Process. Upon completion of the survey, the hotel will communicate the results of the survey as soon as this is practicable and appropriate.

If any employee of the Group or a third party connected in any way with the Group believes that they have suffered retaliatory behavior due to filing a complaint or assisting in the investigation of incidents of discrimination, violence and/or harassment, they must follow the procedure described in the Group's Reporting Policy to report such retaliatory incident immediately.

Reports of conduct that violate this policy will be accepted in writing, named or anonymous under our reporting policy and will be promptly and thoroughly investigated.

To maintain workplace safety and the integrity of investigations, the hotel may, among other things, move employees or modify their working 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 outcome of the investigation shows that an incident of discrimination, violence or harassment or retaliation has taken place, the hotel will take appropriate corrective, disciplinary and/or other actions against the offender.

These actions may include (but are not limited to): (a) disciplinary sanctions, (b) change of position, hours, place or manner of providing work, (c) termination of an employment contract or cooperation contract, (d) legal actions.

In any case, the offender may also be subject to criminal or civil liability, in accordance with the applicable legislation.

This Regulation applies in parallel with the applicable general legislation for the protection of the personality of the employee and does not affect his legal rights at the level of civil and criminal law, as well as the rights to file a Complaint before the competent Supervisory Authority.

## **8. MALICIOUS COMPLAINTS**

Complaints that are proven to be manifestly malicious will be considered inadmissible and will be further investigated at the discretion of the Group, both as to the motives and as to those involved, in order to restore order in any legal way and means.

## **9. FURTHER INFORMATION – REFERENCE PERSONS**

All questions related to the execution or interpretation of this policy should be submitted to the Director, who is designated as the competent person (Reference Person) for informing and advising staff as well as for issues relating to the prevention and handling of violence and harassment in the workplace.

THE MANAGEMENT  
XENOS HOTELS & RESORTS  
May 1st, 2023