

MELISSA ILIAS KALLIANTAS & SONS S.A.

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The company “Melissa Ilias Kalliantas & Sons S.A.”, demonstrating zero tolerance toward incidents of violence and harassment in the workplace, and implementing all measures and obligations concerning the application of the provisions of §2 of Part II of Greek Law 4808/19.06.2021, which ratified International Labour Convention 190/21.06.2021 of the International Labour Organization (ILO), adopts this Policy in compliance with the above provisions, regarding the prevention and management of all forms of violence and harassment based on gender, including sexual harassment in the workplace.

1. PURPOSE

The purpose of this Policy is the prevention and elimination of all forms of discrimination based on personal characteristics, as well as any form of violence and harassment occurring during work, whether connected with it or arising from it.

2. SCOPE OF APPLICATION

Beneficiaries include members of the company, employees under dependent employment contracts, individuals providing services under mandate, project or independent service contracts, temporary workers, individuals employed through third-party service providers, interns and trainees, former employees whose employment relationship has ended, job applicants, and any other persons transacting or cooperating with the company.

3. ZERO TOLERANCE STATEMENT ON DISCRIMINATION, VIOLENCE AND HARASSMENT – RISK ASSESSMENT

The company expresses its commitment to addressing and eliminating discrimination, violence and harassment in the workplace, with the aim of ensuring a working environment where respect for human dignity prevails and discrimination based on personal characteristics or choices will not be tolerated.

By way of example and not limitation, the company strictly prohibits insinuations, mockery, threats, intimidation, racist comments or comments that offend dignity.

The company expressly prohibits behaviors and practices that may cause physical, psychological, or financial harm, as well as any form of sexual harassment.

In investigating and handling such complaints, the company further commits to providing assistance and access to any competent public, administrative, or judicial authority during the investigation of any incident of violence or harassment.

For employees and any persons connected with the company who violate obligations arising from this Policy, the necessary, appropriate, and proportionate measures shall be taken on a case-by-case basis in order to sanction and prevent recurrence of such misconduct.

4. DEFINITIONS

4.1 Discrimination

Discrimination refers to discrimination based on gender, race, color, national origin or social origin, genetic characteristics, language, religion or beliefs, political opinions, disability, age, or sexual orientation.

4.2 Violence and Harassment

Violence and harassment include forms of behavior, acts, practices or threats thereof, which aim at, result in, or are likely to result in physical, psychological, or financial harm, whether occurring once or repeatedly.

Harassing behavior includes conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment, whether or not it constitutes discrimination, including harassment based on gender or other grounds of discrimination.

Harassment prohibited under this Policy includes, but is not limited to:

- Verbal harassment, including abusive comments, insults, or accusations
- Physical harassment, including physical obstruction of work or movement
- Visual forms of harassment, such as posters, cartoons, caricatures, photographs or drawings that are degrading based on legally protected characteristics

- Retaliation or intimidation in response to reporting or threatening to report any of the above forms of harassment or for cooperating in an investigation
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4.3 Gender-Based Harassment & Sexual Harassment

Gender-based harassment consists of behaviors connected with a person's gender, having the purpose or effect of violating their dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment.

Such behaviors include sexual harassment, as well as conduct related to sexual orientation, gender expression, gender identity or gender characteristics.

Sexual harassment is defined as any unwanted conduct of a sexual nature, including unwanted sexual advances, requests for sexual favors, and any other unwanted physical or verbal conduct of a sexual nature. Such conduct may be expressed by a person of any gender and may target a person of any gender.

Examples of sexual harassment include:

- Offering benefits (e.g., promotion or salary increase) in exchange for sexual favors or creating an environment that undermines sexual dignity as a means of avoiding retaliation
- Retaliation or threat of retaliation after rejection of sexual advances
- Physical conduct of a sexual nature (e.g., touching, kissing, interference, gestures, etc.)
- Verbal conduct of a sexual nature (e.g., comments about a person's body, sexual insinuations, sexual jokes, sexual messages)
- Non-verbal sexual conduct (e.g., display of sexual material, obscene looks or gestures)
- Physical contact such as touching, pinching, sexually suggestive gestures, hitting, pushing, physical violence

These acts are indicative and not exhaustive. Any employee or third party engaging in such prohibited conduct shall bear full responsibility for their actions.

5. MEASURES FOR PREVENTION, CONTROL AND RISK LIMITATION – INFORMATION & AWARENESS ACTIONS

The Company reiterates its zero tolerance toward any incident of violence or harassment, in any form, including sexual harassment and gender-based violence, occurring in the workplace or in connection with work, whether between employees, by supervisors, authorized persons (employers), clients, visitors, suppliers, or any third party.

The Company takes all necessary measures to inform and raise awareness among staff, using appropriate means (e.g., printed and electronic materials), ensuring that all employees and associated persons are aware of the Policy, procedures, reporting channels, and available legal protections.

Specifically, the Company:

- Creates an accessible, safe and friendly working environment based on respect for human dignity, mutual respect, courtesy, honesty, understanding, trust, cooperation and support
- Provides information and appropriate training regarding the handling of violence and harassment incidents
- Informs employees and managers of their rights and obligations
- Implements technical measures (e.g., notification systems)
- Regularly evaluates the effectiveness of preventive measures
- Organizes regular staff training
- Provides ongoing educational awareness to cultivate a culture of zero tolerance and equality
- Takes reasonable workplace adjustments to protect employees who are victims of domestic violence
- Enforces the Policy and imposes appropriate sanctions
- Encourages open communication and reporting

6. RIGHTS AND OBLIGATIONS OF EMPLOYEES

Each employee has the right:

- To be treated with respect and courtesy
- Not to be subjected to violence, harassment (including sexual or gender-based violence), discrimination or intimidation
- To report incidents without retaliation

Each employee is obliged:

- To comply with this Policy
- To fully cooperate in investigations
- To report incidents immediately
- To participate in training programs

Managers have additional obligations to enforce, monitor, set behavioral standards, and report incidents to the Administration.

7. DOMESTIC VIOLENCE

The Company takes appropriate measures and reasonable adjustments to protect and support employees who are victims of domestic violence.

8–9. REPORTING PROCEDURE & INTERNAL COMPLAINT MANAGEMENT

Complaints may be submitted verbally or in writing to:

- The President of the Board
- The HR Director
- The CEO (Mr. Konstantinos Kalliantas)

Complaints may also be submitted via email: **ked@elefsinahotel.gr**
or by telephone: **6932254753**

Complaints may be anonymous.

Investigations are conducted confidentially, objectively, and completed within three weeks.

Disciplinary measures may include:

- a) Recommendation for compliance
- b) Change of position, schedule, workplace
- c) Termination of employment or cooperation (subject to Article 281 Civil Code)

Malicious complaints are inadmissible.

10. RIGHTS OF VICTIMS

Victims may leave the workplace without loss of pay if they reasonably believe serious danger exists.

They may also seek:

- Judicial protection
 - Complaint to the Labor Inspectorate
 - Report to the Ombudsman
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11. OBLIGATION OF IMPARTIALITY AND CONFIDENTIALITY

The reporting officer must act objectively, impartially, respectfully, and confidentially. The Administration is equally bound.

12. PROHIBITION OF RETALIATION

Retaliation against complainants is strictly prohibited and constitutes a serious violation of this Policy.

13. COOPERATION WITH ADMINISTRATIVE AND JUDICIAL AUTHORITIES

The Company fully cooperates with competent authorities and processes data in compliance with Law 4624/2019 and GDPR (EU Regulation 2016/679).

14. INFORMATION CONTACT NUMBERS

Ministry of Labour and Social Security: 1555

Greek Ombudsman: +30 213 1306 600

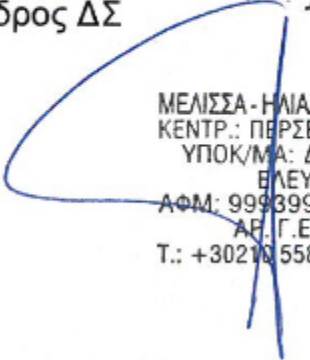
Email: press@synigoros.gr

Labour Inspectorate: www.hli.gov.gr

For the Company

ΜΕΛΙΣΣΑ Η. ΚΑΛΛΙΑΝΤΑΣ κ ΥΙΟΙ Α.Ε.Τ.Ε.Ε

Καλλιαντάς Κωνσταντίνος
Πρόεδρος ΔΣ



ΜΕΛΙΣΣΑ - ΗΛΙΑΣ ΚΑΛΛΙΑΝΤΑΣ & ΥΙΟΙ Α.Ε.Τ.Ε.Ε.
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