

Policy for the Prevention and Management of Incidents of Violence and Harassment in the Workplace and Managing of Internal Complaints

(the "Policy")

[For Greek press here](#)

1. INTRODUCTION

Aria Hotels Hospitality Property Ownership & Real Estate Société Anonyme, registered with the General Commercial Registry (GEMI) under number 122156301000 and with Tax Identification Number (TIN) 998429452 of the Tax Authority FAE Piraeus (hereinafter "**Aria Hotels**" or the "**Company**"), complies with all measures and obligations regarding the implementation of Part II of Law 4808/2021 for the prevention and management of all forms of violence and harassment, including gender-based and sexual harassment.

The purpose of this Policy is to establish and maintain a work environment that respects, promotes, and safeguards human dignity and the right of every individual to a workplace free from violence and harassment. Aria Hotels recognizes and respects the right of every employee to a work environment free from harassment and does not tolerate any such behavior, of any form, by any person.

Aria Hotels expressly and categorically prohibits all forms of violence and harassment, including gender-based and sexual harassment, occurring during work, in connection with work, or arising from work. The company is committed to receiving, investigating, and managing all related complaints with zero tolerance for violence and harassment, maintaining confidentiality and respect for human dignity.

This Policy is adopted in accordance with Articles 9 and 10 of Law 4808/2021 and applies to all employees and workers of Aria Hotels, regardless of contractual status, including those engaged under service contracts, independent services, salaried mandates, those employed through third-party service providers, trainees, apprentices, volunteers, former employees, and job applicants.

Acts of violence and harassment against any of the above persons may occur:

(a) In the workplace, including public and private spaces where the employee provides work, receives remuneration, takes breaks (especially for rest or meals), in areas for personal hygiene and care, changing rooms, or accommodation provided by Aria Hotels.

(b) During commutes to and from work, other work-related travel, training, events, and social activities related to work.

(c) During work-related communications, including those conducted via information and communication technologies.

2. DEFINITIONS

For the purposes of this Policy:

- **“Violence and Harassment”**: Conduct, acts, practices, or threats thereof, that cause or may cause physical, psychological, sexual, or economic harm, whether isolated or repeated. Examples include:
 - verbal abuse or offensive remarks,
 - threats of any kind,
 - demeaning or humiliating behavior,
 - cyberbullying,
 - systematic exclusion from team activities,
 - physical harassment (touching, pushing, pinching),
 - retaliation for reporting misconduct,
 - sexual harassment or innuendos,
 - degrading visual material,
 - solicitation of sexual favors in exchange for benefits,
 - discriminatory insults (e.g., based on age, gender, disability, sexual orientation).
- **“Harassment”**: Conduct intended or resulting in the violation of an individual’s dignity and the creation of an intimidating, hostile, degrading, humiliating, or offensive environment, whether or not it constitutes discrimination.
- **“Gender-Based Harassment”**: Conduct linked to an individual’s gender that violates their dignity and creates an intimidating, hostile, degrading, humiliating, or offensive environment. This includes sexual harassment, as well as conduct linked to sexual orientation, gender identity, expression, or characteristics.
- **“Sexual Harassment”**: Any unwelcome conduct of a sexual nature, including verbal, non-verbal, physical, or psychological behavior, or sexual advances.
- **“Company/Employer”**: Aria Hotels S.A.
- **“Employees”**: All persons employed by Aria Hotels or its affiliates, regardless of contract type or employment arrangement.

- **“Other Workers”**: All other persons engaged beyond employment contracts with Aria Hotels or its affiliates, including independent service providers, contractors, trainees, apprentices, former employees, job applicants, and informal workers.
- **“Reporting Officers”**: Company representatives designated to receive, examine, and manage complaints of violence and harassment.
- **“Policies”**: The present policies for (a) combating violence and harassment at work and (b) managing internal complaints.

Aria Hotels is committed to evaluating each incident and, if found credible, investigating it in accordance with the internal complaints management framework for incidents of violence and harassment in the workplace.

3. PREVENTION AND COMBATING OF VIOLENCE AND HARASSMENT IN THE WORKPLACE

This Policy applies to all workplaces and all locations where employees participate in activities of or on behalf of Aria Hotels, whether physically present, online, by phone, or by other technological means.

To ensure that employees and other workers exercise due care and are sensitized to workplace behavior issues, and to ensure that necessary measures for prevention, control, limitation, and management of related risks are in place, as well as organized and continuous monitoring of such incidents or similar behaviors, Aria Hotels undertakes the following actions:

1. Adopt and implement a Policy for internal complaint-handling procedures for incidents of violence and harassment, ensuring confidentiality and respect for human dignity.
2. Appointment of Reporting Officers for guidance and information regarding prevention and management of workplace violence and harassment.
3. Promote a workplace culture of mutual respect, dignity, and cooperation.
4. Provide employees with necessary information, especially those in roles who have higher risk of such incidents.
5. Encouragement of vigilance and immediate reporting of any such behavior, either experienced or witnessed, in accordance with the complaints Policy.
6. Require supervisors to actively monitor and address inappropriate behaviors within their teams and to take preventive measures when there is evidence or knowledge of potential risks.

4. INTERNAL COMPLAINT PROCEDURE

A. Reporting

If any employee or worker covered by this Policy believes they have experienced or witnessed violence or harassment, Aria Hotels encourages the submission of both named and anonymous reports.

Fundamental principles include the protection of anonymity and confidentiality for complainants, safeguarding their current and future professional status.

Complaints may be submitted in writing to the designated Reporting Officers:

- **Mr. Gerasimos Pantazatos Livier**, Chief Executive Officer — makis.pantazatos@ariahotels.gr
- **Ms. Barbara Metallinou**, Chief of Staff — barbara.metallinou@ariahotels.gr
- Additionally, complaints may be submitted via email at [hr@ariahotels.gr].

B. Investigation

Reporting Officers are responsible for investigating the credibility of reports and, if deemed credible, conduct further investigation and taking appropriate interim measures to protect the complainant (e.g., special paid leave, remote work, or transfer to another department).

Reporting Officers are bound by confidentiality and the protection of personal data collected during their duties.

Aria Hotels prohibits any form of retaliation against complainants, in accordance with Article 13 of Law 4808/2021 and labor law provisions. Any adverse treatment constituting retaliation or reprisal due to the filing of a complaint is strictly forbidden.

If an investigation confirms an incident of violence, harassment, or retaliation, Aria Hotels will take all necessary and proportionate measures against the perpetrator, which may include compliance orders, disciplinary sanctions, changes in position, schedule, location, or method of work, or termination of employment.

C. Outcome

If an investigation confirms an incident of violence, harassment, or retaliation, Aria Hotels will take all necessary and proportionate measures against the perpetrator, which may include compliance orders, disciplinary sanctions, changes in position, schedule, location, or method of work, or termination of employment.

5. PROTECTION AGAINST RETALIATION

In accordance with Article 13 of Law 4808/2021, retaliation against complainants or affected persons is strictly prohibited. Any adverse treatment motivated by the submission of a complaint shall be considered a violation of this Policy.

6. COOPERATION WITH AUTHORITIES

Aria Hotels and its Reporting Officers shall fully cooperate with competent public, administrative, and judicial authorities, providing access to records and evidence in accordance with applicable laws, including Law 4624/2019 on personal data protection.

7. LEGAL RIGHTS OF EMPLOYEES

This Policy is applied in parallel with applicable legislation and does not affect the legal rights of employees under civil and criminal law, nor their right to file complaints with the competent authorities.

Employees may also contact:

- **Labor Inspectorate (SEPE):** Citizen Service Hotline 1555 / Complaints Line 15512
- **Greek Ombudsman:** press@sinigoros.gr / Tel. (+30) 213 1306 600
- **SOS Line 15900:** Immediate psychological support and counseling for women victims of gender-based violence.

This Policy has been communicated to all employees, posted at the workplace, and published on the official website of Aria Hotels.

Adopted by Aria Hotels S.A. in accordance with Articles 9 and 10 of Law 4808/2021.