

# Discrimination, violence & harassment at work

It is an obligation of the CEOs, directors and management of Wavemaker Hospitality Ltd to comply with all requirements related to Part II of Law 4808/2021 as well as with EU regulations (Directive 2000/43/EC, Directive 2006/54/EC, Directive 2004/113/EC,) for the prevention and treatment of any form of violence, gender and race -based harassment, religion or belief, disability, age or sexual orientation, sexual harassment and to ensure the excellent working conditions of all employees, equally treating men and women.

The scope of this policy is to create a work environment that respects, promotes and safeguards human dignity, and the right of every person to a work environment without violence or harassment.

Wavemaker Hospitality Ltd recognizes and respects the right of every employee to a work environment free of violence and harassment and that not every employee should tolerate any such conduct, of any kind, from any person.

# Discrimination, violence & harassment policy

## A. Regarding the prevention and elimination of violence and harassment at work, Wavemaker Hospitality Ltd:

- a) Assess the risks of violence and harassment at work by conducting an autopsy of its workplaces, but also taking into account factors such as the proportion of the working population, gender, age, language, religion and other characteristics that may constitute reasons for discriminating against employees.
- b) Takes measures to prevent, control, limit and address the above risks, as well as to monitor relevant incidents or behaviours.

Specifically, Wavemaker Hospitality Ltd ensures a safe, friendly and accessible work environment, where the relationships between employees, associates, management and members of its companies are distinguished by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.

Wavemaker Hospitality Ltd trains its executives to recognize discrimination, violence and harassment at work and to provide the necessary support to its staff and partners.

Each head of department in Wavemaker Hospitality Ltd is responsible for supervision and control of potential incidents of violence and harassment within every department and must be in open communication with the employees involved in a potential incident.

- c) Acts to inform and raise awareness of its staff about the risks of violence and harassment. It declares zero tolerance for any acts of violence and harassment and is committed to providing its staff with briefing and information in accessible formats, as well as to organize targeted meetings with its staff to discuss relevant issues and timely address potential risks.
- d) Provides information on the rights and obligations of the employees and the employer, as well as the information on persons who exercise the managerial right or represent the company, to the extent of their own responsibility, in case of occurrence or report or termination of such incidents, as well as for the relevant procedure. In particular, the company informs the employees about the legal rights of an affected person, including the right to judicial protection, the submission of a complaint and an application for a labour dispute to the Labor Inspection. Within the framework of its legal responsibilities, the company report to the Ombudsman also within the framework of his legal responsibilities, as well as the complaint to the competent body of the company in accordance with the complaint management policy.
- e) **Designates as a reference persons/ position** ("liaison") to guide and inform employees regarding the prevention and treatment of violence and harassment at are stated in section B, hereafter.
- f) Ensures the protection of employment and the support of workers victims of domestic violence, as far as reasonably practicable, by any appropriate means or reasonable regulation. In particular, the company demonstrates in practice the support of the above category of employees by providing flexible work arrangements upon request of the employee who is the victim of domestic violence, in order to support the employee in maintaining the job and smooth reintegration after similar incidents.
- g) We adamantly reject discrimination in employment and occupation, racial and religious discrimination, ensuring an inclusive and equitable workplace for all.

## **B. Regarding the process of receiving and examining complaints:**

a) Communication channels - competent persons

**The responsible person within the company in Greece to receive, examine and manage the complaints or grievances of the affected persons for violent and harassing behaviours is:**

**Mr. Tsampikos Magioglou.**

**For potential complains in Cyprus, please write to us on: [compliance@wavemakerhospitality.com](mailto:compliance@wavemakerhospitality.com) or call us on 00 357 25 883 516.**

**Affected persons communicate with the above either in person, by telephone at 22410 04117/ 6932 201 769 /00357 25 883 516 by sending an e-mail to [t.magioglou@atlantichotels.com](mailto:t.magioglou@atlantichotels.com) or [compliance@wavemakerhospitality.com](mailto:compliance@wavemakerhospitality.com) by completing and sending to the designated e-mail the complaint form.**

The competent person informs the affected person about his / her rights, at any stage of the procedure followed within the company, to submit a complaint to the competent administrative authorities, to the Labor Inspection and the Ombudsman, as well as to judicial authorities of his /her choice.

b) Investigates and examines the complaints with impartiality and protection of the confidentiality and personal data of the victims and the accused. The company and the above competent person undertake to receive, investigate and manage immediately any such complaint, to investigate and examine the complainants, as well as to take immediate measures to protect the victim. In the performance of the above duties, responsible person must act fairly and comply with the privacy regulations of Personal Data collected.

c) Complies with the prohibition of retaliation against the affected person. The company supports employees to report incidents of violence and harassment they have suffered and takes all appropriate measures to effectively protect them.

d) Identifies and describes the consequences in case of violations. The company, after assessing the severity of the reported incident and in cooperation with the affected person, may impose adverse measures against the complainant, such as the establishment of compliance, change of position, schedule, place or manner of employment or even the termination of his employment or cooperation relationship with the company, without prejudice to the prohibition of abuse of right of article 281 of the Civil Code.

e) Cooperates and provides any relevant information to the competent authorities, upon request. In particular, the company as well as the above complaints management person, cooperate with any competent public, administrative or judicial authority, which, either ex officio or at the request of the person concerned, within its competence, requests the provision of data and information and undertakes to provide assistance and access to this data. For this purpose, all the data collected, in any form, are kept in a relevant file, in compliance with the provisions of the law 4624/2019.

This policy will be reviewed annually for its continuous suitability.

**Vasilis Nicolaidis**

Co-CEO

Wavemaker Hospitality Ltd.