



GRECOTEL POLICIES

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Greotel, the largest and most successful Greek Luxury Hotel Group, is a pioneer in the creation and implementation of dynamic holistic corporate social responsibility programs and has made its network of over thirty hotels throughout the country an industry model. With a multitude of activities ranging from environmental awareness and cultural programs to educational and humanitarian support, Greotel is engaged in making our communities a better place for everyone.

As our policies are subject to change you are kindly invited to visit the portal regularly.



MESSAGE FROM THE MANAGER

We, at Grecotel, undertake our leadership role with a true sense of awareness and deep appreciation of our responsibilities, and we reciprocate the trust society has placed in us with tangible and substantive support for numerous programs and activities. We provide you a safe and friendly hotel experience where sustainability is key: operating with minimum environmental impact, raising environmental awareness, supporting local initiatives, buying locally, promoting culture and education, exhibiting sensitivity for vulnerable groups, improving regional and international health and social living conditions, and serving as an employer of choice.

The following policies are based on international standards, management and operational procedures. We share these policies to help you become familiar with the ways in which we promote the safe enjoyment of our hotel facilities.

Panagiotis Markou
General Manager





Quality Policy

Grecootel recognizes that a robust quality management system offers benefits to all concerned, both internally and externally. Service quality is understood to be a tool for satisfying client expectations at the highest level of standards. We at Grecootel:

- Comply with the current national and international legal framework and regulatory requirements.
- Identify and understand our guests' expectations, measure perceptions, and implement changes to increase satisfaction. The effectiveness of our services and guest satisfaction is monitored through our guest questionnaires, tour operators' feedback and management/ staff meetings and auditing control reviews.
- Deliver on-time qualitative products, systems and services that meet or exceed our guests' expectations.
- Improve our employees' skills and motivation through regular training in quality, hygiene and food safety practices.
- Embed social responsibility and company ethics policies in our business practices.
- Assure the quality and safety of our supplies.
- Improve operational performance along the value chain from suppliers to guests.
- Implement a continual improvement quality system with audited measurable objectives for guest services.
- Generate environmental awareness of hotel employees to leave a cleaner, healthier, and safe environment for the next generation.

Our Quality Assurance Department sets standards and measurement methods for guest satisfaction. The General Manager is responsible for the implementation of the hotel's quality system and establishes the sustainable development philosophy underpinning the continuous improvement process. Employees at all levels apply the principles in their everyday activities. Employees are guest satisfaction focused and exercise leadership with the aid of such tools as guest comments, weekly walkthrough inspections and health-and-safety-at-work regulations.



Health and Safety Policy

Grecotel is committed to ensuring the health and safety of all persons including employees and guests. We take all reasonable and practical steps to improve work safety conditions and strive to uphold the core values of safety, knowledge, integrity and leadership in order to achieve our goal of zero accidents. We at Grecotel:

- Comply with all health and safety legislation, acts, regulations, codes of practice and other guidelines.
- Ensure all managers are directly responsible and accountable for the health, safety and welfare of their employees and always provide them with the necessary resources.
- Provide personal protective equipment and clothing for safe working conditions.
- Provide appropriate Health and Safety Training to involved parties.
- Maintain relevant procedures, systems, information, training, recognition programs, and organizational structures to support and communicate effective health and safety practices throughout the hotel.
- Establish clear targets and objectives to improve health and safety.
- Effectively disseminate health and safety information and standards to all employees as part of each business unit's consultative process.
- Employees attend all training and read all information

distributed. They follow the rules and safety systems of the workplace, including those governing the use of any required personal protective equipment/clothing.

- Cultivate and maintain a positive safety culture through the active participation, consultation and cooperation of all employees and guests in promoting and developing measures for the improvement of health and safety for all.
- Actively respond to and investigate all incidents and ensure that injured employees are able to return to their job as rapidly as possible through equitable claims management and rehabilitation practices.

Grecotel implements and maintains these systems, standards, policies and procedures. These standards are monitored regularly to ensure their integrity and effectiveness and to facilitate continuous improvement.



Environmental Policy Statement

Grecotel pursues sustainable development processes for economic prosperity, the reduction of social inequalities and the restoration of the planet's environmental sustainability. Systematic improvement is one of our main goals. Grecotel has introduced environmental programs in all hotels with the aim of minimizing our environmental footprint. Our goal is to provide high quality services which respect the environment and the local communities.

Grecotel contributes to the protection of the environment in the following ways:

- Systematically sets higher goals and evaluates their success with ever higher standards.
- Adopts 13 of the 17 UN sustainable development goals.
- Ensures the implementation of existing environmental legislation.
- Forms and implements environmental programs throughout the whole range of its activities and writes sustainability reports on an annual basis.
- Systematically improves its environmental behavior based on annual measurements and controls and sets new targets for further improvement.
- Monitors environmental noise, energy, water, and waste measurements and regularly performs environmental audits.
- Ensures environmental awareness of all stakeholders including guests, employees, suppliers, and the local community.
- Maintains for its employees a systematic educational program on environmental projects and encourages them

to participate actively.

- Innovates in management with modern operating methods and practices.
- Uses natural products and supports the primary sector by preferring local and recycled products.
- Supports international and national environmental organizations and NGOs.
- Designs and implements construction and renovation building projects of buildings, where nature prevails.
- Undertakes actions to protect the landscape, wildlife and historical monuments.
- Informs and ensures the observance of human rights in all hotel processes and procedures.
- Strengthens and supports the local communities.

Organizationally, Grecotel's Environmental Manager formulates the implementation plans for all the Environmental Programs and communicates these to all employees and guests. All Hotel Managers are committed to supporting the implementation plans by providing all necessary means for their proper operation and continual improvement.

Furthermore, each hotel there is a dedicated Green Team responsible for ensuring the implementation of environmental measurements and initiatives. Ultimately, all employees are responsible for the promotion, support and implementation of the Environmental Programs in their daily activities.



Children Rights Policy

At Grecotel, we hold ourselves responsible for the active safeguarding of children from all forms of mistreatment or abuse, from physical neglect through to emotional or sexual or exploitation.

We support and respect the protection of human rights throughout the company's sphere of influence, including standing against human trafficking and the exploitation of children. We publish our Children's Rights Policy and provide training for all our employees on human rights, including the protection of children. Grecotel is committed to:

- Respecting and endorsing children's rights and takes all necessary measures to protect children against all types of exploitation.
- Adopting preventive measures to stopping the planning or circulation of tourist programs which promote or encourage sexual contact with minors.
- Establishing a Grecotel Group ethical policy against the commercial sexual exploitation of minors.
- Reporting all suspicious cases involving children to the authorities, the local police and child protection agencies.
- Providing our staff with training on child protection. All our employees are trained to handle such cases while we take strong actions to ensure that children's best interests are ensured.
- Supporting all kinds of organizations and activities

for the protection of children, such as "THE SMILE OF THE CHILD" a Hellenic voluntary, non-profit child welfare organization actively involved in activities to raise public awareness about the prevention of violence against children.

- Providing information to guests through informative material and our portal.
- Reporting annually on the progress made towards achieving the above implementation of the targets.

All persons who do not comply with these rules, and ignore warnings given by hotel management, shall be expelled from the hotel. According to the offence, the General Manager may notify the law enforcement authorities. All employees must adopt this policy and show determination and support for its implementation.



Corporate and Social Responsibility Policy

In Greotel we champion the importance of Corporate Social Responsibility in the hospitality industry. The Policy sets our social priorities and principles.

We are committed to:

- Operating in accordance with CSR strategy and Continuous improvement.
- Encouraging our business partners to reach company's standards.
- Complying with all relevant national and international rules and regulations for the implementation of best practices in all our operations.

Ethical Business Conduct in order to ensure:

- Fair treatment of all employees and clients.
- Transparency of our business policies and practices.
- High standards relating to health and safety in the working environment.
- Ethical business practices throughout our operations.

Human Rights

- Support and respect the protection of internationally proclaimed human rights.
- Encourage vendors to actively to observe international human rights norms.

Animal Rights

- Support initiatives to help preserve and protect our natural heritage through participation in such programs as the WWF protection of the Caretta-Caretta at our beaches.

Impact on Society

- Our awareness of the local and wider community is a given and is nurtured.

- We effectively support the needs of the local community.
- Dialogue with local communities is encouraged as mutually beneficial.
- Respect the local culture, traditions and intellectual property rights.

Equal Opportunities Employer

- Provide equal opportunities to all employees and job applicants.
- No job applicant shall receive less favorable treatment on the grounds of sex, age, marital status, sexual orientation, race, color, religion or belief, nationality, ethnic or national origin.
- No discrimination relating to employees and job applicants for any reason (such as special needs or part time or short-term status) without full and proper justification.

Child Protection Policy

- Promote human rights, and in particular children's rights by training employees and providing information to guests.
- Reject, eradicate and condemn any form of human exploitation, especially that of a sexual nature, particularly when this involves minors.
- Greotel does not utilize or promote child labor.



Purchase Policy

Purchasing decisions can have a significant environmental, social and financial impact. Responsible procurement (or sustainable/responsible purchasing) is a process by which environmental, social and ethical considerations are considered when making a purchasing decision. Greotel considers the following parameters:

- Whether a purchase is necessary: Every purchase must cover a real need of the hotel whilst considering the hotel category.
- The type of materials and products used: Priority should be given to recyclable and returnable products as well as to those from recycled materials, mostly paper, aluminum, glass, plastic. Avoid excessive multiple packaging because the more complex a product is, the more materials are used in its production and the more waste is disposed of into the environment.
- Under what conditions they have been manufactured.
- How far they have travelled: Product transportation is always an important factor to be considered, as it

contributes to air pollution and fuel consumption, and the use of non-renewable sources of energy.

- The packaging components: Purchase of products in bulk with re-useable, recyclable or returnable packages. This practice reduces both the cost and the impractical packaging that ends up as waste.
- Product disposal: Among the artificial and chemical products of everyday use, preference is given to those with the least damaging effects on the environment and human health.

Priority will be given to products from local markets, progressively from a municipal, regional to state level, provided that they meet the basic standards and needs of Greotel. Regarding the purchase of equipment, priority is given to the products that consume less water, energy and fuel and do not contain CFCs. Our environmental-friendly specifications are developed by Greotel's Environmental Department in cooperation with the Purchasing Department on the basis of specific European Union and international regulations, and the latest scientific research and innovation.



Privacy Policy Statement

Grecotel is committed to the highest standards of personal data protection because we strongly believe that only by doing so can we win and maintain the trust placed in us by all those we work with and serve. We take a comprehensive approach towards achieving this goal and involve all departments in diligently developing, adapting and improving the strongest technical and organizational measures towards that end. We at Grecotel:

- Design our policies and processes for the collection and processing of personal data so as to fully comply with national legislation and the EU General Data Protection Regulation.
- Provide detailed, targeted personal data protection policies for employees, business partners and guests and these are available to them at all times.
- Continually revise and improve these policies and processes.
- Design our policies to easily fully inform everyone of their freedoms and rights over how their personal data is used and of the privacy practices we implement. Our policies are available on all Grecotel sites.
- Take measures to engage those trusting us with their

personal data to actively signal their consent with opt-in statements wherever these are appropriate. Other such measures include the addition of privacy terms in all our forms and contracts that have to do with the processing of personal data.

- Periodically engage our employees in awareness and training programs to create a strong data protection culture at all levels.

Our Data Privacy Officer leads a team of internal and external experts in continually updating and improving our technical and organizational privacy policies and procedures. We draw upon the feedback and experience of employees, business partners and guests, as well as the most recent changes in European and National privacy legislation.

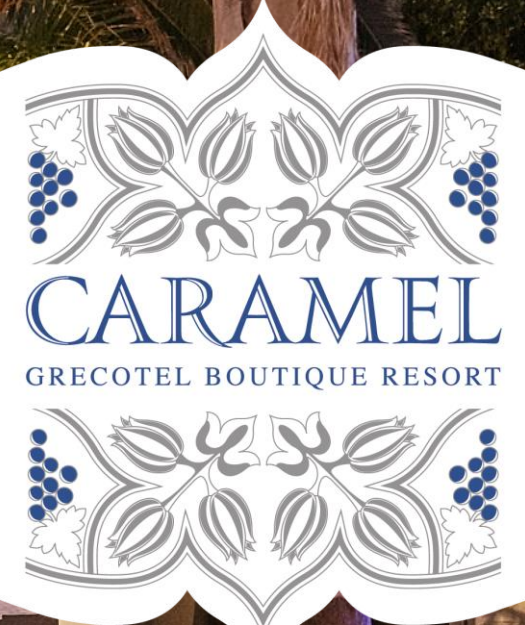


Complaints Policy

Greotel is committed to maintaining its responsiveness to the needs and concerns of its guests in order to deliver high quality professional services. Greotel follows the guiding principles of effective complaints handling:

- The Complaints Handling Policy is available on the Greotel portal.
- The Policy is accessible to all partners, employees and clients. It is easy to understand and includes details on submitting and resolving complaints.
- Receipt of each complaint is acknowledged to the complainant. Complaints will be handled in an effective and efficient manner. Throughout the complaint-handling process complainants are notified of the progress of the complaint handling.
- Each complaint is dealt with in an equitable, objective and unbiased manner through the complaints handling process.
- There are no charges complaint submission.
- Personal information concerning the complainant, in compliance with our strict Privacy Policy standards, is actively protected from disclosure unless the complainant expressly consents to its disclosure.
- Partners and employees are committed to the efficient and fair resolution of complaints. We actively solicit feedback from our guests on a regular basis and acknowledge each guest's right to complain.
- All partners and employees accept responsibility for effective complaints handling.
- Our complaints handling process is reviewed periodically -at least annually- by our Quality Assurance Department to enhance the efficiency of service delivery.

Complaints are examined by the Complaints Officer on a quarterly basis for the identification of systemic or recurring problems. If such problems are identified, the company will consider actions to be taken to address these challenges. Wherever appropriate, the Complaints Officer will ensure that issues raised in the complaints handling process are reflected in employee performance evaluations.



GRECOTEL
HOTELS & RESORTS