Travel Management Company

CORPORATE POLICY FOR THE PREVENTION AND COMBATING VIOLENCE AND HARASSMENT AT WORK.

Regal Travel Management Company S.A., demonstrating zero tolerance for incidents of violence and harassment in the workplace, adopts this policy, in compliance with articles 9 and 10 of law 4808/2021, which ratified the International Labor Convention 190/21.06.2021 of the International Labor Organization (ILO), concerning the elimination of violence and harassment in the world of work, the text of which was annexed in its entirety to the text of the law. Regal Group complies with all measures and obligations relating to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

1. Purpose

The purpose of this policy is to create and consolidate a work environment that respects, promotes and ensures human dignity and the right of every person to a world of work free from discrimination, violence and harassment. Regal Group declares that it recognizes, respects and protects the right of every employee to a working environment free from violence and harassment and that it does not tolerate any such behavior, of any form, by any person.

2. Scope of application

Subject Persons This policy covers the persons of par. 1 of art. 3 of Law 4808/2021 and its scope of application and protection includes all types of workers and employees of Regal Group, regardless of their contractual status, including those employed under a contract of employment, independent services, paid mandate, those employed through third-party service providers, individuals undergoing training, including interns and apprentices, volunteers, individuals whose employment relationship has ended, individuals applying for employment and other individuals who do business or collaborate with it.

3. Prohibited forms of conduct

Definitions Violence and harassment.

"Violence and harassment" means forms of conduct, acts, practices or threats thereof, which aim to, result in or are likely to result in physical, psychological, sexual or economic harm, whether occurring individually or repeatedly, Harassment. "Harassment" means forms of conduct, which aim to or result in the violation of a person's dignity and the creation of an intimidating, hostile, degrading, humiliating or offensive environment, regardless of whether they constitute a form of discrimination, and includes harassment based on gender or other grounds of discrimination,

Harassment based on gender.

"Gender-based harassment" means forms of conduct related to a person's gender, which have as their purpose or effect the violation of the dignity of that person and the creation of an intimidating, hostile, degrading, humiliating or aggressive environment according to article 2 of law 3896/2010 (A' 107) and par. 2 of article 2 of law 4443/2016 (A' 232). These forms of conduct also include sexual harassment of law 3896/2010, as well as forms of conduct related to the sexual orientation, expression, identity or gender characteristics of the person.

Discrimination.

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"Discrimination" means the different treatment of people resulting from prejudices or interests, any act by which individuals are unjustifiably separated on the basis of the groups, classes or other categories to which they belong or are perceived to belong. For example, discrimination is based on gender, age, language, nationality, race or ethnicity, disability, religious beliefs or sexual orientation. Incidents. The forms of behavior prohibited by this policy include, but are not limited to: Insulting due to discrimination based on gender, race, religion, appearance, sexual orientation, disability, age, or other personal characteristics and choices, threats, verbal or physical, insults in public or in private, belittling or ridiculing a person or their abilities, either in private or in front of third parties, threatened or actual physical violence, and persistent or unjustified criticism. Abusive, malicious, derogatory, obscene or mocking comments and their dissemination, innuendo, sexist or racist "jokes" and comments, the use of offensive language, verbal sexual harassment or suggestions, the implication that someone's sexual advances can advance their career or that refusing to engage in a sexual relationship may negatively affect their career path at the Company, the offering of benefits (e.g. promotion or salary increase) in exchange for sexual advances or the creation of an environment that promotes "sexual contact" as a means for professional development in the workplace, retaliation or threat of retaliation after rejecting sexual advances. Cyberbullying, sending messages with harassing and offensive content via SMS, email, social media, fax or letter, persistent and/or offensive questions about age, marital status, personal life, sexual orientation without legal reason and cause, as well as similar questions about race or ethnicity, including cultural identity and religion. Also included are visual forms of harassment such as posters, cartoons, caricatures, photographs or drawings that are derogatory based on characteristics protected by law. Unwanted physical contact such as touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing as well as all kinds of physical violence. Violation of privacy, intentional partial or total destruction of personal belongings, vehicles or assets, interference with or obstruction of normal work, movement and physical integrity of the individual, physical exclusion or confinement, sexual gestures, physical surveillance, stalking. The above acts are indicative and do not constitute an exclusive list of prohibited acts. Legitimate behaviors. The following behaviors do not constitute incidents of violence and harassment. Direct supervision of employees, including setting performance expectations. Taking measures to correct performance, such as placing an employee on a performance improvement plan. Assigning tasks and guiding them on how and when they should be done. Requesting updates or progress reports. Approval or justified denial of leave. Requesting documentation of absence for health reasons based on applicable legal provisions. The moral or financial reward for excellent employee performance. The provision of constructive feedback regarding work performance.

4.Scope of Application – Definition of the Workplace

4.a. Workplace is understood as a broader spatial context in which incidents of violence and harassment can take place. The above forms of behavior can take place in all the company's facilities nationwide, in which employees provide their services, as well as in those areas where employees receive their pay, take a break for rest or food, in personal hygiene and care areas, changing rooms or accommodation provided by the company to the staff. Furthermore, this policy also covers all types of travel to and from work, other travel, travel, conferences, training, as well as social events and activities related to work or connected to the company's actions. Finally, it also applies to all types of communications related to

the company, including those carried out through information and communication technologies (e.g. emails, zoom or teams' meetings, social media, etc.).

4.b. Domestic violence – All acts of physical, sexual, psychological or economic violence that take place within the family or home, regardless of biological or legal family ties, or between former or current spouses or partners and regardless of whether the perpetrator shares or has previously shared the same residence with the victim. Domestic violence that takes place in the workplace, for example through physical violence, sexual harassment and stalking by current or former partners, is a serious form of violence in the workplace. Acts of domestic violence, including stalking/monitoring, can also be committed by people in the same work environment, with whom they have (or had in the past) close relationships. Domestic violence, in any of the above forms, inflicted on the employee during teleworking.

5.Assessment of the risks of violence and harassment at work

5.a. Assessment of risk factors and their improvement. Regal Group carries out studies in collaboration with all its departments and the competent doctor regarding the possible risk factors depending on the nature and scope of the work provided, the psychosocial risks, including the risks of violence and harassment at work, with the aim of assessing the existing working conditions and adapting them in a way that limits as much as possible the chances of an incident of violence and harassment occurring in the workplace. Examples of risk factors include: high stress in the workplace, isolated or enclosed workplaces, job allocation, facility security and control, lack of appropriate training, people with a history of violent behavior, delivery of goods or services, working alone or in an isolated area, working late at night or during the morning hours, domestic or personal life issues that spill over into the workplace.

5.b. Organizing seminars, issuing information leaflets and regular training of staff on violence and harassment. All employees must understand those behaviors that constitute violence and harassment, which are intolerable and unacceptable. The competent reference person for violence and harassment issues will ensure that staff receive appropriate awareness on violence and harassment issues and will make this policy known inside and outside the company.

6. Measures to prevent incidents of violence and harassment.

6.a. Information on the rights of affected people. Regal Group declares that in the event that a person is affected by an incident of violence and harassment during access to employment, during the employment relationship or even if the contract or employment relationship in the context of which the incident or behavior allegedly occurred has expired, he has: a) the right to judicial protection, b) to appeal, submit a complaint and request for a labor dispute to the Labor Inspectorate, within the framework of its legal responsibilities, c) to report to the Ombudsman, within the framework of his legal responsibilities, as well as d) to file a complaint within the company in accordance with the complaint management policy. The individual procedures for submitting, managing and internally investigating reports include the detailed steps that any complainant must take, as well as the responsibilities of the bodies of Regal Group and the actions they must take to ensure the effective management of relevant incidents. In any case, when a report or complaint of such behavior occurs within the company, the affected person retains every right to appeal to any competent authority. Any employee who is subjected to domestic violence, which also extends to the workplace, may

report this fact orally or in writing to the human resources manager in order for the company to be informed and to take the appropriate and necessary measures.

6.b. Information, awareness-raising and staff support actions. Regal Group hereby informs its staff and maintains in a visible place the details of the competent administrative authorities, to which any affected person has the right to appeal (Labor Inspectorate, Ombudsman), in particular it informs about the SEPE complaint hotline (15512) but also through the citizen service line 1555 and https://1555.gov.gr, as well as about the direct psychological support and counseling service for female victims of gender-based violence who can contact the SOS Line 15900 (General Secretariat for Demographic and Family Policy and Gender Equality [G.G.I.F.]. Regal Group, within the framework of its capabilities, takes every appropriate measure and makes every reasonable adjustment to working conditions for the protection of employment and the support of employees – victims of domestic violence. It also takes all necessary measures to inform and raise awareness among staff, using the appropriate means to combat violence and harassment, as appropriate, as mentioned above, ensuring that everyone is aware of the company's policy and procedures regarding incidents of violence and harassment, knows where to turn in the event of violence or harassment, as well as the possibilities given to them by law. Regal Group trains its executives in every appropriate way and means to recognize discrimination, violence and harassment at work and to provide the required support to its staff and associates. It also encourages the participation of employee representatives and management executives in training programs and seminars on the recognition and management of potential risks of violence and harassment and may also hold seminars with mental health specialists or counseling providers.

7. Internal Complaints Submission and Management Procedure

Reporting Person Any employee against whom any incident of violence and harassment has occurred may submit a verbal or written complaint to the Human Resources Director (Administration Manager), who is also designated as the "reporting person", for this policy. The complaint may be submitted in person or by email to the email address k.andritsou@htravelgroup.com. The complaint cannot be made anonymously. The complaint must include the details of the person complained about, i.e. the person who committed a form of prohibited conduct, as well as the specific incident(s) that constitute it. The reporting person thoroughly investigates each complaint and collects any necessary information regarding it. Complaints and investigations remain strictly confidential to the greatest extent possible, considering the sensitivity of the case and the confidentiality of all parties involved. In particular, he may speak with the complainant and the accused, examine witnesses, request the production of any documents that may exist and from which it is proven that any incident of violence and harassment took place or not and communicate with the heads of each department, in case the complainant addressed them. Once the reporting person has completed his investigation, he submits a written report in which he states the result of the investigations. The results of the investigation are simultaneously communicated to the complainant and the accused, in order for them to take note of them. The completion of the investigation and the submission and notification of the report person's findings must take place as soon as possible and, in any case, no later than 3 weeks from the date of submission of the complaint by the complainant. - In the event that an incident of discriminatory treatment, violence or harassment or retaliation is documented, the Company's Management proceeds, on a case-by-case basis, to take all necessary, appropriate and proportionate measures

against the person complained about. These measures may include but are not limited to: a) the recommendation for compliance, b) the change of the job position, hours, place and method of providing work, c) the termination of the employment or cooperation contract with the company, without prejudice to the prohibition of abuse of rights under Article 281 of the Civil Code. - Complaints that prove to be clearly malicious will be considered unacceptable and will be further investigated at the company's discretion, both in terms of motives and those involved, in order to restore order by any legal means.

8. Rights of those affected

According to the current legislation, any person who experiences an incident of violence and harassment against him/her has the right to leave the workplace for a reasonable time, without loss of salary or other adverse consequences, if, in his/her reasonable belief, there is an imminent serious risk to his/her life, health or safety, in particular, when the employer is the perpetrator of such behavior or when he/she does not take the necessary and appropriate measures to restore peace at work, or when these measures are not sufficient to stop the behavior of violence and harassment. In this case, the person leaving is obliged to inform the reporting person in writing beforehand, stating the incident of violence and harassment and the circumstances that justify his/her belief that a serious risk to his/her life, health or safety is imminent. Employees who face incidents of violence and harassment at work have the right to appeal to the competent authorities, as defined by law (a. right to judicial protection, b. right to appeal and submit a complaint and request for the conduct of a labor dispute to the Labor Inspectorate, within the framework of its statutory responsibilities, c. report to the Ombudsman, within the framework of his/her statutory responsibilities).

9. Obligation of impartiality and confidentiality

The reporting person is obliged to act in an objective and impartial manner during the complaint investigation process. Furthermore, he must behave with respect towards all parties involved and in a confidential and confidential manner. The publication or disclosure of non-involved parties of information concerning the complaint under consideration is completely prohibited. The above obligations also apply to the company's Management during the final stage of taking measures and decisions.

10. Prohibition of Retaliation – Victimization of the Complainant Retaliation and victimization of the complainant, who, as an aggrieved person, claimed his rights and filed a written complaint regarding an incident of violence and harassment, is prohibited. Retaliation and victimization of the complainant constitute a serious violation of this policy and entail consequences for the person acting in this manner. If any employee or third party associated in any way with the company believes that he has been subjected to retaliatory behavior due to filing a complaint or providing assistance in the process of investigating incidents of discrimination, violence and/or harassment, he must follow the above procedure for reporting the said incident of retaliation.

11. Cooperation with administrative and judicial authorities

Regal Group, as well as any competent person or service for the reception and management of such complaints at the corporate level, cooperate with any competent public, administrative or judicial authority, which, either ex officio or following a request from an affected person, within the framework of its

competence, requests the provision of data or information and is committed to providing assistance and access to the data. To this end, any data they collect, in any form, are kept in a relevant file in compliance with the provisions of Law 4624/2019 (Government Gazette A' 137) "Personal Data Protection Authority, implementing measures of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of data.". For more information regarding this policy, any interested person may contact the Human Resources Director (Administration Manager). This Policy is posted on the company's official website at the following link: https://regalgroup.gr/.

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