



GRECOTEL
WHITE PALACE

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

At Grecotel, we 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.

Kontorinis Vardis
Hotel General Manager





Quality Policy

Greotel 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 Greotel:

- 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, online review sites, 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
 - Collaborations with local businesses & suppliers
 - Contribution to the local community (sponsorships - donations)
- Employment of local populations
- Contribution to the local economy through our activities
- Assure the quality and safety of our supplies.
- Keeping an updated list of suppliers and revising it according to quality certifications
- Improve operational performance along the value chain from suppliers to guests.
- Set quality objectives, which are reviewed in a monthly as well as annual basis as to the progress of their achievement, approves new or modifies older, depending on the conditions and the factors prevailing in the market.
- Consistently monitors all the critical parameters and processes, in order to ensure the quality and safety of the facilities, services and staff.

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.



Quality Policy

Greotel 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 Greotel:

- Identifies and allocates all necessary resources to ensure the smooth, efficient and effective operation of the Company
- Manages any data and information safely and effectively, as well as any property that may be gained in the cooperation with its customers and complies with the legislation regarding personal data.
- CIs committed to the continuous improvement of the quality of the services provided and of the Quality Management System itself, with the ultimate aim of increasing customer satisfaction and improving competitiveness.
- Remains systematically informed of developments concerning its operation sector.
- Develops links of constructive cooperation with its customers and suppliers and promotes an open dialogue and information of interested parties in a spirit of sincere and mutual respect.
- Operates with a view to protecting the environment and defending the moral and ethical rights of workers.
- 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.
- Raising environmental awareness through continuous education and initiatives
- Applies specific procedures for monitoring and measuring customer satisfaction, and the application of corrections and corrective actions when needed.
- Invests in the development of new technologies & techniques that improve the quality of its services and create a technologically modern and professionally suitable working environment
- Continuously trains staff and encourages them to active participation, on an individual and team level, in order to fulfill quality objectives and to ensure the improvement of the Quality Management System

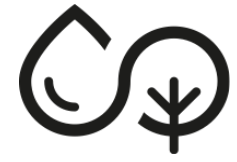


Health and Safety Policy

Greotel 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 Greotel:

- 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.
- We implement a comprehensive crisis management plan for immediate and effective response to emergency situations, ensuring the safety and well-being of our guests and staff.

Greotel 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

Greotel is committed to make sustainable living commonplace. Our strategy defines our priority environmental focus areas in pursuit of our purpose. These are, climate action (including greenhouse gas emissions and energy management), protect and regenerate nature (including eliminating deforestation, sustainable sourcing, water stewardship and biodiversity protection) and waste-free world (including plastic packaging, food waste and waste management) In addition to the focus areas defined by the legal, we are committed sustainable practices in our operations which reduce emissions to air, land and water.

To whom it applies

This Policy applies to our operations over which we have direct control, encompassing employees and contractors engaged at our hotels and other facilities, including administration offices, Danilia Village, Agreco Farm etc. Furthermore, in collaboration with partners involved in segments of our value chain beyond our direct control, we advocate for the adoption of the same standards outlined in this Policy.

Greotel's Environmental Manager develops and communicates implementation plans for Environmental Programs to all staff and guests. Hotel Managers ensure support, while Green Teams enforce initiatives at each hotel. All employees promote and implement Environmental Programs in their daily duties



Environmental Policy Statement

Our commitment

Climate protection

- We are members of the U.N. global compact, supporting the 17 goals initiative and taking action to achieve them.
- In Greotel, we reduce carbon emissions across the supply chain in line with the goals of the Paris Agreement and our absolute carbon emission reduction target
- We monitoring and reporting our progress on our sustainable goals
- Our philosophy includes the formulation and execution of environmental initiatives throughout our entire range of activities, accompanied by annual sustainability reports.
- We methodically upgrade our environmental practices based on yearly evaluations and controls, consistently setting new targets for improvement.
- We elect to utilize products and establish partnerships with businesses and companies that do not adversely impact the environment.
- Furthermore we undertake actions to protect the landscape, wildlife and historical monuments.
- Every product in our inventory and for sale is cruelty-free and ocean friendly

Waste Reduction

- We implement energy management systems to reduce energy consumption and environmental footprint
- We adopted "hotel waste methodology systems" to record, monitor, and reduce food waste.
- In our company, we utilize alternative energy sources for partial or complete energy consumption.
- We have eliminated single-use plastic water bottles, plates, cutlery, and cups.
- In addition, we have implemented an extensive recycling program.
- We provide bulk-size bathroom toiletry bottles for shampoo, conditioner, and shower gel as amenities.
- We provide a Digital PressReader for guests, eliminating the need for physical newspapers and magazines.
- We use natural products and support primary sector by preferring local and recycled products.
- Guests can enjoy biodegradable coffee pods and tea bags during their stay
- We also collaborate with our suppliers to recycle coffee capsules.



Environmental Policy Statement

Stakeholders & community

- We promote environmental awareness among all stakeholders: guests, employees, suppliers, and the local community.
- Our targets are met through various initiatives such as renewable energy, energy efficiency improvements, waste reduction, innovation in equipment, and supplier engagement.
- We maintain a systematic educational program on environmental projects for our employees, actively encouraging their participation.
- We innovate in management with modern operating methods and practices
- We support international and national environmental organizations and NGOs.
- We design and implement construction and renovation building projects of buildings, where nature prevails.
- We prioritize the awareness and adherence to human rights across all hotel processes and procedures.
- We empower and support local communities
- We prioritize partnerships with sustainable suppliers for hotel purchasing and products.
- We encourage suppliers to minimize unnecessary packaging

Energy-water reduction

- We have implemented water conservation measures to save water resources
- We continuously supervised our carbon footprint
- We have Energy-saving control systems at our guest rooms
- Drinking water fountains are accessible
- Transitioning to alternative energy sources using solar panels
- Our transportation options include e-cars, e-bikes, e-mini buses, and e-car chargers

Sustainable gastronomy

- Our menu features locally sourced, sustainable, and seasonal ingredients
- Local fishermen supply our culinary department with fresh ingredients and responsibly sourced seafood
- Sustainably sourced coffee and tea available are provided
- We offer cage-free eggs from select purveyors
- Endangered species are banned from all of our menus



Human Rights Policy

Grecotel is committed to ensuring that its staff and suppliers understand and implement the principles of respecting human rights. To this end, the company organizes annual human rights training for all hotel employees, while this policy is also communicated to subcontractors and partners.

Our commitment

Respect for Human Rights and Fair Working Conditions:

- We ensure respect and protection of human rights in all areas, including working conditions, terms and conditions of employment, recruitment of staff and fair career development of our employees.
- In Grecotel, we foster a culture of dignity and respect in interactions with guests and employees.
- We are committed to preventing forced labor, child labor and any form of exploitation within our operations and supply chain.

Freedom of Association:

- In Grecotel, we ensure the right of all our employees to join a union or create their own group to discuss terms and conditions of employment, manage complaints and submit ideas/ suggestions without fear of retaliation.
- We actively support open communication and collaboration between management and employee representatives to foster a positive and inclusive work environment.

Compliance with National Legislation:

- We ensure that working hours, breaks, leave days and paid leave comply with national legislation, reflecting our commitment to fair labor practices.
- We compensate overtime work appropriately or provide equivalent leave, always with employee's free consent.
- We provide additional benefits such as sick leave, maternity leave and other legally mandated entitlements to support the well-being of our employees.
- We regularly review and updated our policies to ensure compliance with changing laws and regulations.

Non – Discrimination:

- In our company, we are committed to ensuring a diverse and inclusive workplace by prohibiting discrimination based on race, gender, age, religion, sexual orientation, disability or any other characteristic.
- We ensure equal access for all guests to our hotel services and facilities, promoting inclusivity and accessibility.
- Also, we uphold equal employment terms and conditions for all our employees, including fair working hours, breaks, holidays, benefits, opportunities for advancement and access to training programs.
- We implement clear policies and procedures to address and resolve any complaints of discrimination promptly and fairly.

Reporting Issues:

- We ensure the right of all our employees to report issues or seek assistance from law enforcement or other legal authorities without restrictions or fear of retaliation.
- We provide confidential channels for employees to report any concerns regarding human violations, unethical behavior or workplace misconduct.
- We take all reports seriously and conduct through investigations to address and resolve issues promptly.



Human Rights Policy

Staff Support and well – being:

- We provide access to occupational health and safety services, ensuring a safe and healthy work environment for all our employees.
- We offer wellness programs and initiatives to support the physical and mental health of our staff.
- We organize events and activities at the end of each season to celebrate achievements and provide additional experiences for our employees, fostering a sense of community and appreciation.

Prevention of abuse and Harassment:

- We implement strict procedures to prevent any form of abuse harassment or violence in the workplace, ensuring a safe and respectful environment for all employees.
- We conduct regular training sessions on recognizing, preventing and addressing workplace harassment and abuse, collaborating with specialized organizations such as “The Smile of Child”.
- We provide support and resources for employees who may experience or witness harassment, ensuring their concerns are addressed promptly and effectively.

Promotion of Local Culture:

- We actively promote and respect the local culture and heritage of each region where we operate, integrating cultural appreciation into our services and activities.
- We encourage our guests to interact respectfully with local communities, fostering cultural exchange and mutual understanding.
- We collaborate with local artisans, performers and cultural organizations to showcase and support the rich traditions and cultural heritage of the areas we serve.

Staff Training:

- We provide comprehensive training to our staff on human rights issues, emphasizing the importance of respect, equality and protection of individual rights.
- Furthermore, we offer specialized training on child protection to ensure our employees are equipped to identify and address any potential risks to children.
- We regularly update training programs to reflect the latest best practices and legal requirements.

Through these commitments, we aim to create a working environment that promotes respect, justice and well-being while raising awareness of human rights throughout our company’s value chain.



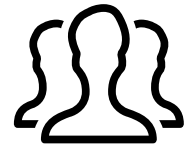
Children Rights Policy

At Greotel, 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. Greotel is committed to:

- Respecting and endorsing children's rights and takes all necessary measures to protect children against all types of exploitation.
- Establishing a Greotel 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.
- Providing information to guests through informative material and our portal.
- Reporting annually on the progress made towards achieving the above implementation of the targets.
- 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.

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.



Bribery Corruption and Fraud Policy

Greotel is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure all forms of bribery, corruption, and fraud are prevented. Greotel has zero tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships we build with our employees. Greotel will constantly uphold all laws relating to anti-bribery and corruption and adhere to the SIZA Social Standard requirements in combating any form hereof

To whom it applies:

This policy applies to all employees, managers, and owners of Greotel, including temporary or contract employees. Employees must ensure that they do not become involved in any way in the payment of bribes. This policy sets out the minimum standards to which all employees of Greotel must adhere at all times.

Definitions:

Bribery can be described as: giving or receiving anything from any person (usually money, a gift, loan, reward, favour, commission or entertainment), as an improper inducement or reward for obtaining business, employment or any other benefit. Bribes can therefore include, but are not limited to:

- Gifts and excessive or inappropriate entertainment, hospitality, travel and accommodation expenses.
- Payments, whether by employees or business partners such as recruiters, labour service providers or consultants.
- Other 'favours' provided to supervisors, such as making unwanted advances, payments or promises.

Our commitment:

All employees of Greotel must adhere to the company ethos of bribery and corruption. No employee or manager will be allowed to take part or become involved in any form of bribery, corrupt behaviour, or fraud, including the following:

- Offer, pay, or give anything of value to any person through which one will unethically gain something in return which is not provided for in terms of their employment contract.
- Attempt to mislead or induce any person to do something illegal or which goes against the company policy.
- Mislead or intentionally lie to any person to gain an advantage above and beyond their employment agreement.
- Violate any rules by shifting blame or responsibility onto another employee/person.
- Fraudulent practices against the company ethos or legislation.

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.



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