



CONSTANTINOU BROS
HOTELS
PAFOS CYPRUS

Workplace Discrimination, Violence & Harassment Policy

Policy | October 2025

The managing directors and management of Constantinou Bros Hotels are obligated to comply with all requirements related to Part II of Law 4808/2021, as well as 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, and sexual harassment. They must ensure excellent working conditions for all employees, treating all genders equally.

The purpose of this policy is to foster a work environment that respects, promotes, and safeguards human dignity, and ensures the right of every individual to a workplace free from violence and harassment. Constantinou Bros Hotels acknowledges and upholds the right of every employee to a safe work environment and emphasizes that no employee should tolerate any form of violence or harassment from anyone.

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Constantinou Bros Hotels recognizes and respects the right of every employee to a work environment free of violence and harassment. No employee should tolerate any such conduct, of any kind, from any person.

A. Regarding the prevention and elimination of violence and harassment at work, Constantinou Bros Hotels:

a) Risk Assessment: We assess the risks of violence and harassment at work by conducting thorough evaluations of our workplaces. This includes considering factors such as the proportion of the working population, gender, age, language, religion, and other characteristics that may lead to discrimination against employees.

b) Preventive Measures: We take measures to prevent, control, limit, and address these risks, as well as to monitor relevant incidents or behaviors. Specifically, Constantinou Bros Hotels ensures a safe, friendly, and accessible work environment where relationships between employees, associates, management, and members of our companies are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation, and support.

c) Training and Supervision: We train our executives to recognize discrimination, violence, and harassment at work and to provide the necessary support to our staff and partners. Each head of department is responsible for supervising and controlling potential incidents of violence and harassment within their department and must maintain open communication with the employees involved in any potential incident.

d) Awareness and Zero Tolerance: We act to inform and raise awareness among our staff about the risks of violence and harassment. We declare zero tolerance for any acts of violence and harassment and are committed to providing our staff with information in accessible formats. We also organize targeted meetings with our staff to discuss relevant issues and address potential risks promptly.

e) Rights and Obligations: We provide information on the rights and obligations of employees and the employer, as well as the responsibilities of those who exercise managerial authority or represent the company. This includes information on the legal rights of affected persons, such as the right to judicial protection, the submission of complaints, and the application for labor dispute resolution to the Labor Inspection. We also report to the Ombudsman and the competent body of the company in accordance with our complaint management policy.

f) Liaison Designation: We designate reference persons or positions ("liaisons") to guide and inform employees regarding the prevention and treatment of violence and harassment as stated in section B.



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g) Support for Victims of Domestic Violence: We ensure the protection of employment and support for workers who are victims of domestic violence, as far as reasonably practicable, by any appropriate means or reasonable regulation. We demonstrate our support by providing flexible work arrangements upon request of the employee who is a victim of domestic violence, to help them maintain their job and smoothly reintegrate after such incidents.

h) Commitment to Non-Discrimination: We adamantly reject discrimination in employment and occupation, including 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 receive, examine, and manage complaints or grievances of affected persons for violent and harassing behaviors is Mr. Neofytos Touros. For potential complaints, please write to**

hr@cbh-cyprus.com or call +35726964500. The competent person informs the affected person about their rights at any stage of the procedure followed within the company, including the right to submit a complaint to the competent administrative authorities, the Labour Inspection, the Ombudsman, and judicial authorities of their choice.

b) Investigation and Examination: Complaints are investigated and examined with impartiality and protection of the confidentiality and personal data of the victims and the accused. The company and the competent person undertake to receive, investigate, and manage any such complaint immediately, to investigate and examine the complainants, and to take immediate measures to protect the victim. In performing these duties, the responsible person must act fairly and comply with privacy regulations regarding personal data collected.

c) Prohibition of Retaliation: The company complies with the prohibition of retaliation against the affected person. It supports employees in reporting incidents of violence and harassment they have suffered and takes all appropriate measures to effectively protect them.

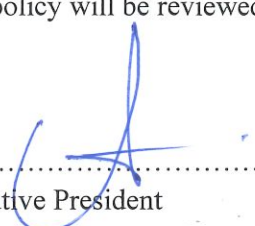
d) Consequences of Violations: The company identifies and describes the consequences in case of violations. After assessing the severity of the reported incident and in cooperation with the affected person, the company may impose adverse measures against the complainant, such as compliance establishment, change of position, schedule, place or manner of employment, or even termination of employment or cooperation relationship with the company, without prejudice to the prohibition of abuse of rights under Article 281 of the Civil Code.



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e) Cooperation with Authorities: The company cooperates and provides any relevant information to the competent authorities upon request. The company and the complaints management person cooperate with any competent public, administrative, or judicial authority that requests the provision of data and information and undertakes to provide assistance and access to this data. All collected data, in any form, are kept in a relevant file in compliance with the provisions of Law 4624/2019.

This policy will be reviewed annually to ensure its continuous suitability.


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Executive President
Mr Andreas Constantinou

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