

CALDERA GROUP OF HOTELS & VILLAS Human Rights & Human Resource Policy

Respecting human rights is a fundamental part of Caldera Group of Hotels & Villas responsibility as a company and is vital to operate our business sustainably. of Caldera Group of Hotels & Villas is committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. We seek to avoid complicity in human rights abuses and to use our influence to promote the fulfilment of human rights. Our commitment to operating with respect for human rights is reflected in all aspects of Caldera Group of Hotels & Villas business operations and is integrated in our company policies and relevant procedures. We aim to identify, assess, and manage the human rights impacts of our business activities based on the operational context, our leverage and business relationships. Caldera Group of Hotels & Villas looks to those human rights defined in the Universal Declaration of Human Rights and its two corresponding covenants, The International Covenant on Civil and Political Rights and The International Covenant on Economic, Social and Cultural Rights. Additionally, we also look to children's and women's rights as outlined in the United Nations Convention on the Rights of the Child and the United Nations Convention on the Elimination of Discrimination against Women and the protection of any minorities and vulnerable groups as they are identified.

Human rights and key stakeholders

In implementing this policy, we focus our efforts on issues and relationships in which we have greater degrees of control and influence, as outlined below.

Suppliers

Caldera Group of Hotels & Villas works with suppliers and business partners to ensure that human rights are respected in the supply chain, based on our business relationships, leverage and operational context. Our engagement is manifested through our Sustainability Commitment and managed through applicable follow-up procedures. As appropriate, we use tools for human rights risk and impacts assessments to identify actual and potential human rights issues. Actions to manage and address human rights risks and impacts are guided and carried out through dialogue and collaboration with relevant stakeholders. Caldera Group of Hotels & Villas also aims to use its influence to support the advancement of human rights in the communities where we operate.

Employees

We believe our employees are our greatest assets, and recognize our ethical as well as legal responsibilities to take care of them. We believe that by treating our employees well, they in turn will continue to take the very best care of our customers.

Caldera Group of Hotels & Villas seeks to respect the human rights of all employees within the Caldera Group as well as comply with all national laws. Our commitment is manifested in policies such as the Discrimination and Equality Policy and the Global Harassment Policy. To ensure remediation of potential abuses, we have a complaint procedure which is applicable to the whole Group.

The primary goals therefore related to our human resource management are as follows:

1. Recruitment

Atlantica Caldera Creta Paradise will ensure that a fair system is in place so that all applicants for available positions are fairly considered. Caldera Group of Hotels & Villas will not discriminate in any way and welcomes applications from all candidates regardless of their race, age, sex, nationality, disability or religion.

2. Contract/Legislation

Throughout the period of employment, Caldera Group of Hotels & Villas will have a contract that meets as a minimum the regulations as stipulated by national law.

3. Induction and Training

Caldera Group of Hotels & Villas will ensure that all new employees are provided with appropriate induction and training. This will cover such areas as company philosophy and culture, product knowledge, employee welfare and benefits, heath and safety, performance management, etc.

4. Development and Promotion

All employees of the Caldera Group of Hotels & Villas will be encouraged to further develop their skills and opportunities for promotion will be provided wherever possible. All employees will have individual objectives, and individual development plans will be agreed with managers/supervisors to review objectives and agree new targets.

It is our company policy that all legal requirements are fully complied with regarding employment; therefore we do not employ children under 16 which is the minimum required age for employment.

We aim to offer a safe and secure work environment and free from any form of discrimination based on race, age, sex, nationality, disability or religion and we are committed to follow any relevant labour legislation, promoting a fair treatment of our employees, preventing any form of discrimination, exploitation, harassment and abuse and allow employees to meet up during working hours, from an association and elect a spokesperson in order to discuss issues without management involvement.

Customers

Caldera Group of Hotels & Villas seeks to respect the human rights of our customers in all operating countries. Our main focus areas include: respecting the privacy of our customers e.g. by safe storing of any personal data, and aiming for that no customers are discriminated against, as outlined in our Discrimination Policy. In addition, we strive for that our marketing is done with respect for the views of our stakeholders by not aiming to communicate any specific ideal, but rather a range of styles, attitudes and ethnic backgrounds. We also state that our business is in the area where children are not sexually exploited from tourism related issues and all employee are informed for the importance of child protection and all are actively involved where this is necessary for children protection. If any suspicious activity in relation with child abuse has been noticed, the Hotel Manager will immediately report the incident to the Local Authorities.

Society

We participate where appropriate in public affairs in a non-partisan and responsible way to promote internationally recognized human rights. We play a positive role, within our spheres of influence, in capacity-building for the realization of human rights. We promote the realization of environmental sustainability and development through our core business and through our participation in other multi stakeholder activities where appropriate. We uphold the highest standards in business ethics and integrity and where appropriate to support efforts of national and international authorities to establish and enforce such standards for all businesses.

This policy is reviewed annually for its continuous suitability.

General Manager

Manousos Psaroudakis

MANOUSOS PSAROUDAKIS, MBA HOTEL GENERAL MANAGER