Metaxa Hospitality Group

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Message from the CEO

●GRI 2-22

Dear readers,

2022 has been a year of geopolitical and economic challenges, both at a national and international level.

Both the hospitality industry and our key stakeholders, such as shareholders, partners, guests, employees, and the local communities where we operate, were confronted with the negative effects of inflation, and the broader volatile economic conditions that prevailed.

Despite these difficulties, as a Group, we managed once again to successfully operate our hotels, by offering high quality services of authentic hospitality, and to further implement our growth strategy by responsibly exploiting new capabilities and new opportunities to expand the portfolio we are managing.

Above all, however, we remained committed to our timeless priority of developing a **Sustainable Development** strategy, serving in practice **Sustainable Hospitality** for all. The operation of the Sustainability Committee, the Strategic Priorities, the Sustainable Supplies as well as the Communication of our Achievements, constitute the 4 pillars of our strategy.

Sustainable Development constitutes the cornerstone of our journey. With a **"Think Global – Act Local"** character we respond in a timely manner to global trends of tourism experiences, with Sustainable Development criteria.

We have developed a long-term strategy for our Sustainable Development, with concrete goals and measurable results, which are presented in the following pages of this report.

Enjoy your reading,

Andreas N. Metaxas
CEO, Metaxa Hospitality Group

SUSTAINABLE DEVELOPMENT IS THE CORNERSTONE OF OUR JOURNEY

2022 at a glance

804
employees
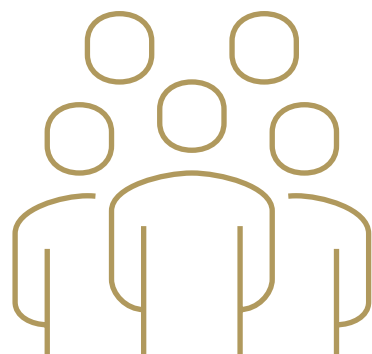
86%
of whom come from the local community

53%
of whom are women

1,300
suppliers

89%
of whom come from Greece

Business plan worth
€85 m.
for the renovation of premises and the upgrading of services

24
distinctions
for the Group's hotels

Carried out the 1st materiality analysis according to
GRI
Standards 2021

€21,000
in social programs

Hospitality sponsorship worth
€25,748
to performance actors hosted at the Group's hotels in Crete

8 tn
of plastic recycled

53.3%
of total energy consumed came from renewable energy sources

Energy production from a photovoltaic system
143,947 kWh
at Creta Maris Resort

1

A SUSTAINABLE HOSPITALITY GROUP

1. A Sustainable Hospitality Group

● GRI 2-1 | GRI 2-6

1.1 Profile

Metaxa Hospitality Group (hereafter referred to as the "Group" or "Metaxa Hospitality Group"), is based in Heraklion, Crete and consists of two economic entities, the Touristic Enterprises Company - TEAV S.A., which includes the hotel units Creta Maris Resort and TUI Magic Life Candia Maris in Crete and Marmari Hotel - Touristic - Commercial - Transport Enterprises Company S.A., which includes the hotel unit Santo Pure Oia Suites & Villas.

Metaxa Hospitality Group provides authentic hospitality services and is recognized with international awards and certifications. The Group commenced with its first hotel unit in Crete in 1975, by the late Nikolaos Metaxas and his wife Theano Evangelia Metaxa, whose work is continued by their family. The Group operates based on the principles of Sustainable Development, having employees, the local community, and visitors at the core of its activities.

During 2022, the Group operates:

(A) in **Crete,** with the 5* hotel **"Creta Maris Resort"**, in Hersonissos, Heraklion, housing the largest convention centre in Crete and one of the largest convention centers in Greece, the "Mikis Theodorakis Convention Center", and the 5* "TUI Magic Life Candia Maris" hotel, in Amoudara, Heraklion

(B) in **Santorini,** with the 5* **"Santo Pure Oia Suites & Villas"**. In 2023, the Group will inaugurate the Santo Collection Resorts & Villas hotel complex, which will consist of the hotels "Santo Pure Oia Suites and Villas", "Santo Mine Oia Suites" and "The Villas by Santo Collection".

As part of its strategic growth plan for the coming years, the Group will continue its expansion in the hospitality sector with investments in Crete and Santorini.

Metaxa Hospitality Group

METAXA HOSPITALITY GROUP S.A.
100%
TEAV S.A.
100%
MARMARI S.A.

The Hotels

Hotels	Rooms, Suites & Villas	Area	Location
CRETA MARIS RESORT	681	156,000m²	Crete Hersonissos
TUI MAGIC LIFE CANDIA MARIS	320	73,000m²	Crete Amoudara Heraklion
SANTO PURE OIA SUITES & VILLAS	65	36,000m²	Santorini Oia

CRETA MARIS

RESORT

All-inclusive ★ ★ ★ ★ ★

Creta Maris Resort commenced its operation in 1975, the year the Group was founded. It is an award-winning 5* all-inclusive resort in Hersonissos, characterized by the creation of unique experiences of authentic hospitality, offering to the visitor an experiential connection with the civilization, ethos, customs, gastronomy, culture and history of Crete, having Sustainable Development at the heart of its operation.

Creta Maris Resort is one of the most leading hotels in Greece, applying Sustainable Development practices for the well-being of the local communities of Crete, which, by extension, contribute to the strengthening of the national economy.

In winter 2022, Creta Maris Resort implemented a five-year business plan for the renovation of its premises and the upgrading of its services, of a total value of €44m. The works undertaken in 2022 included the renovation of common areas and gastronomy areas while new gastronomy departments were created.

⊕ www.cretamaris.gr
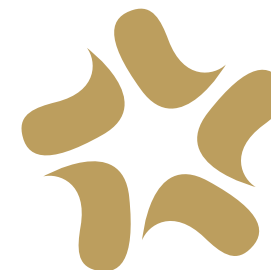
TUI MAGIC LIFE
CANDIA MARIS

All-inclusive ★ ★ ★ ★ ★

TUI Magic Life Candia Maris commenced its operation in 1995 in Amoudara, Heraklion, Crete. It is a 5* seaside resort, with an all-inclusive character, ideal for adults and children over 16 years old, having as main features the wellness and recreation, offering a variety of activities and luxurious hospitality facilities, while it also has conference facilities. At the heart of the hotel's proper operation is sustainable development, as it adopts best practices for the protection of the environment, the support of the local community, strengthening the local market, creating a prosperous working environment, the production of organic products and provision healthy meals, sustainable gardening as well as informing and raising public awareness on ecological issues.

⊘ www.candiamaris.gr

SANTO PURE

OIA SUITES & VILLAS

★ ★ ★ ★ ★

Santo Pure Oia Suites & Villas, operating since 2016 in Santorini, was the first hotel of the Group in Santorini.

Located in Oia, Santo Pure Oia Suites & Villas is characterized by comfortable spaces of Cycladic architecture. In winter 2022, the Group implemented an investment plan of €41m. The plan is expected to be completed by April 2024 and includes the creation of 20 new suites at Santo Pure Oia Suites & Villas, a new hotel unit of 37 suites, Santo Mine Oia Suites, as well as 2 luxurious, autonomous villas, The Villas by Santo Collection, in the area of Oia.

www.santocollection.gr

The services of Metaxa Hospitality Group

1 Hospitality – Accommodation

1,066 rooms, suites & villas.

2 Catering

A total of 11 restaurants, 17 bars and 5 snack points.

3 Recreation

Tennis, padel, football (5x5), mini golf, 3x3 basketball, boccia, areas for various sports activities such as cycling, aerobic, yoga, pilates and archery, 2 outdoor amphitheaters for evening performances, 1 open-air cinema (the largest in capacity in Europe), outdoor and indoor pools, heated or not.

4 Conference organization

The Mikis Theodorakis Convention Center consists of 28 main halls, 11 auxiliary rooms and can accommodate up to 5,025 delegates. In addition, Santo Pure Oia Suites & Villas and TUI Magic Life Candia Maris have a total of 6 conference rooms.

5 Wellness

3 gym areas in collaboration with the chain of wellness centers "OL wellness club".

Our philosophy and values

Our philosophy

Metaxa Hospitality Group is a leading Greek hospitality group, recognized for its ethos, passion, and word.

Values

The Group operates based on the following core values:

Authentic, quality hospitality

The Group is dedicated to offering quality experiences of authentic hospitality, welcoming to its hotels not just customers, but true friends, many of whom regularly visit every summer.

Social Responsibility

The Group feels a responsibility to give back to the society. It organically connects hospitality with the local community and economy. It promotes social responsibility in every function and activity of its hotels, highlighting the culture, heritage and gastronomy of each local area .

Business ethics

The Group looks its partners "in the eyes". It builds solid life relationships with its associates, based on honesty, mutual respect, mutual trust, transparency, and reliability.

Sustainable development

Sustainable Development is its perennial priority. It is the horizontal constant that permeates the entire corporate governance over time. Thus, on the one hand, it fulfills its moral duty, and on the other hand, it responds in a timely manner to global trends in the offering of tourism experiences, with criteria of sustainability and ecological footprint.

Leadership, innovation, development

Dares to shape the future. The Group strongly believes in the dynamics of Greek tourism. That is why it develops a long-term growth strategy, responsibly harnessing new possibilities and new opportunities to expand its managed portfolio.

The Group's People

People are the Group's strength. It builds stable, long-term relationships within a fair and safe working environment. The Group works and grows with them on the road to success.

Dedicated to delivering authentic hospitality experiences

Sustainable Development is a timeless priority

Dares to shape the future

Circle of values

The Group feels a responsibility to give back to society

Stands with ethos next to partners

People are its strength

Metaxa Hospitality Group
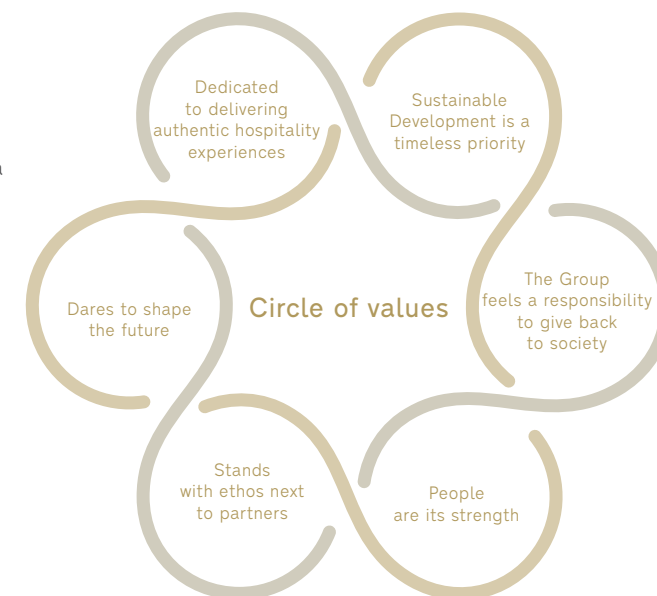
1.2 Business model

● ATHEX A-G1

The table below presents in detail the Group's business model, which reflects its inputs, business processes, products and services, as well as the value it creates.

Group Business Model

Inputs

Financial Capital
• Equity
• Grants
• Earnings
• Loans

Industrial capital
• 3 hotel complexes
• 1 conference center
• Equipment and machinery

Human Capital
• 804 employees
• Knowledge, abilities and skills
• Ethical values

Natural Capital
• Land use
• Water uses
• Ecosystems of hotel buildings
• Production of electricity from RES:
  - Investment in a photovoltaic park (2 MW) in Northern Greece and the TUI Magic Life Candia Maris resort*,
  - installed photovoltaic power system at Creta Maris Resort.*

Social Capital
• 1,300 suppliers (89% Greece, 11% International)

Intellectual Capital
• Software, systems, processes, and protocols
• Certifications

Business Processes

Philosophy- Values

Risk and opportunity assessment procedures

Corporate governance practices

Sustainable Development Strategy

Products and Services

Main hotel units

CRETA MARIS
RESORT

where the "Mikis Theodorakis Convention Center" is housed

TUI MAGIC LIFE CANDIA MARIS

SANTO PURE
OIA SUITES & VILLAS

Main services
• Hospitality – Accommodation
• Catering
• Recreation
• Conference Organization
• Wellness

Outputs: The value we create

Governance
• Business ethics

Environment
• Climate Stability
• Biodiversity, ecosystems and soil
• Water resources
• Waste and resource intensity

Society
• Employment practices & human rights
• Health and safety

Impacts

Value created by the company more broadly in the economy, society and the environment.

3 GOOD HEALTH AND WELL-BEING
4 QUALITY EDUCATION
5 GENDER EQUALITY
6 CLEAN WATER AND SANITATION
7 AFFORDABLE AND CLEAN ENERGY
8 DECENT WORK AND ECONOMIC GROWTH
12 RESPONSIBLE CONSUMPTION AND PRODUCTION
13 CLIMATE ACTION
14 LIFE BELOW WATER
15 LIFE ON LAND
16 PEACE, JUSTICE AND STRONG INSTITUTIONS
17 PARTNERSHIPS FOR THE GOALS

* The photovoltaic park (2 MW) in Northern Greece and in the TUI Magic Life Candia Maris resort, are expected to be connected to the grid within 2023.

Metaxa Hospitality Group

● GRI 201-1

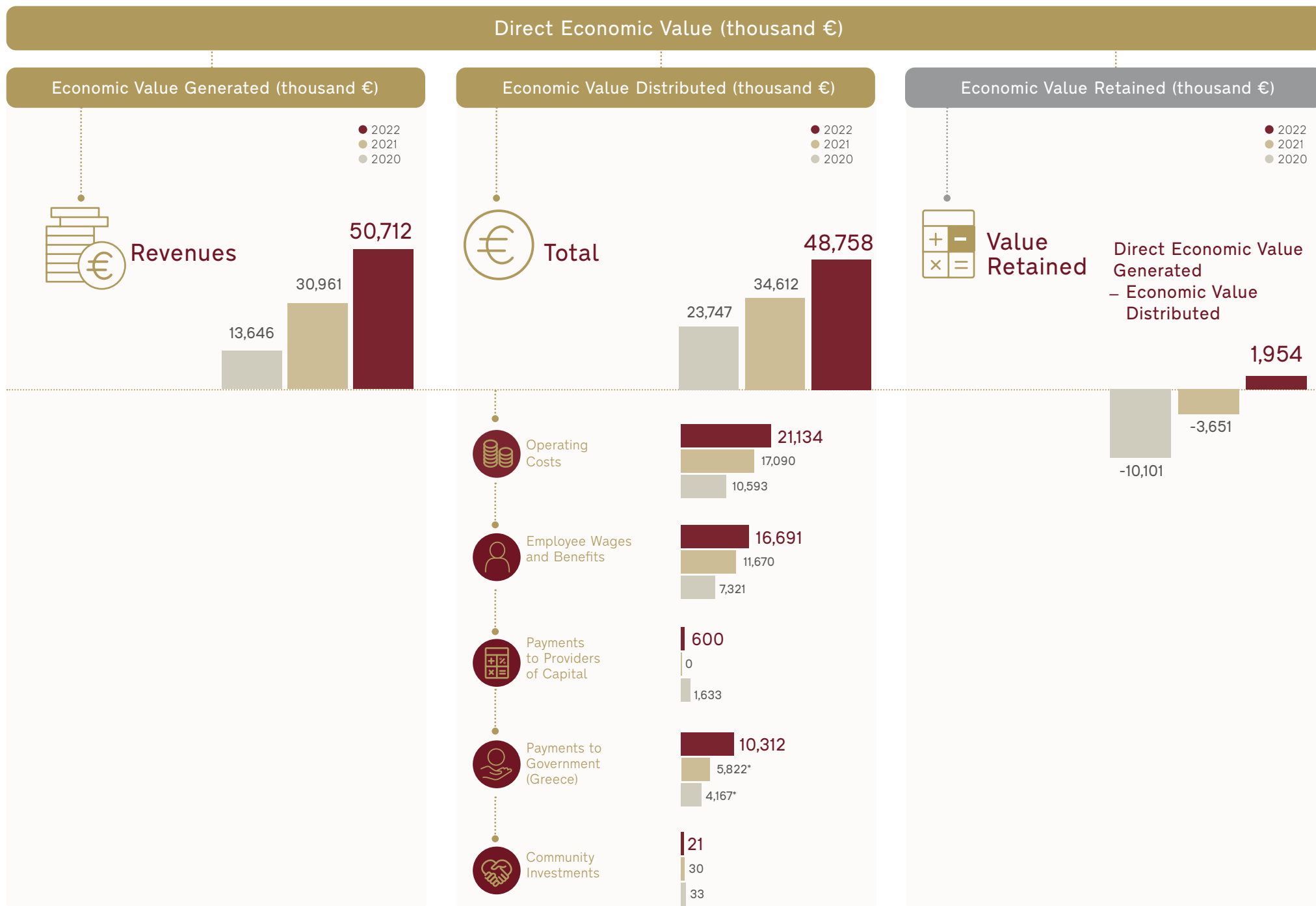## Direct Economic Value (thousand €)

Economic Value Generated (thousand €)

● 2022
● 2021
● 2020

Revenues

13,646
30,961
50,712

Economic Value Distributed (thousand €)

● 2022
● 2021
● 2020

Total

23,747
34,612
48,758

Operating Costs
21,134
17,090
10,593

Employee Wages and Benefits
16,691
11,670
7,321

Payments to Providers of Capital
600
0
1,633

Payments to Government (Greece)
10,312
5,822*
4,167*

Community Investments
21
30
33

Economic Value Retained (thousand €)

● 2022
● 2021
● 2020

Value Retained

Direct Economic Value Generated − Economic Value Distributed
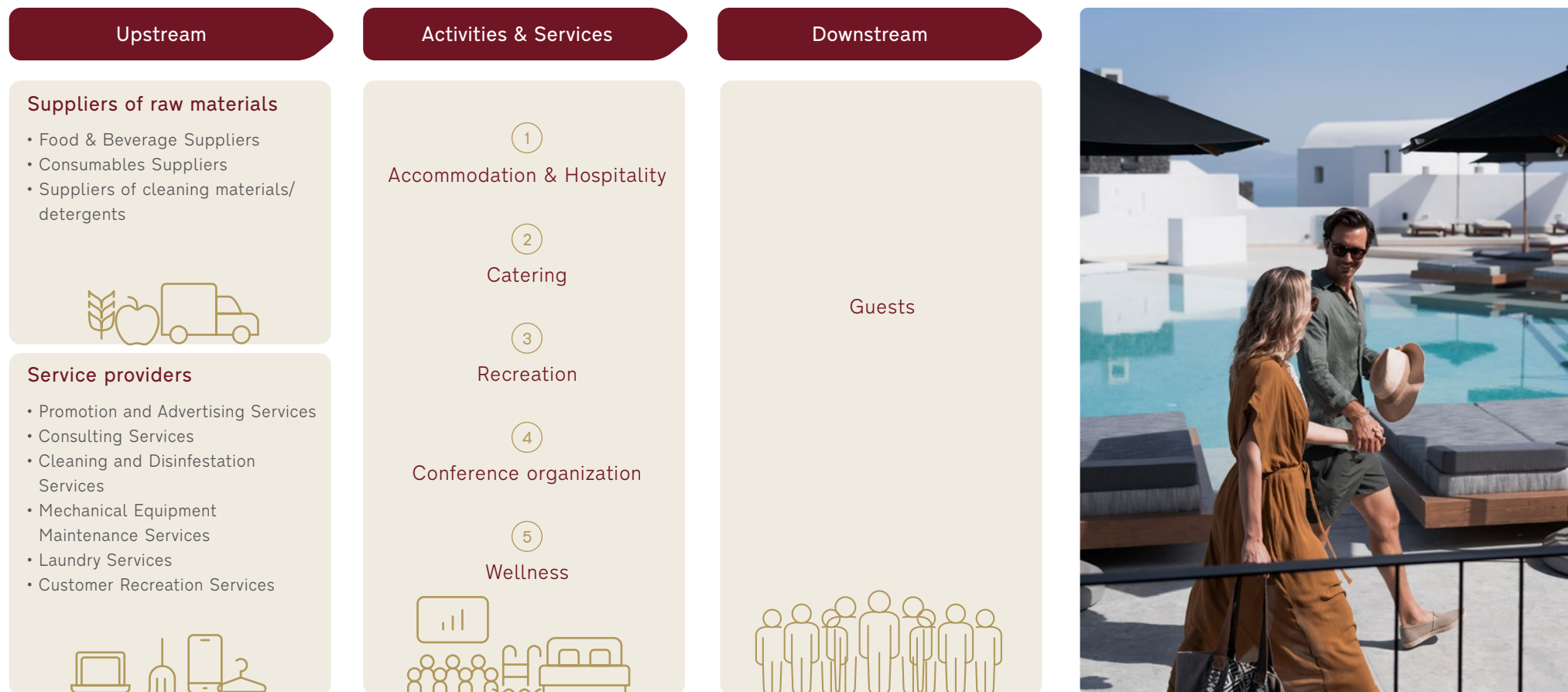
1,954
-3,651
-10,101

* In 2020 and 2021 payments to the Greek government were reduced as there were more tax reliefs due to the COVID-19 pandemic.

1.3 Value chain and business relationships

● GRI 2-6

The Group's value chain and business relationships play a crucial role in its Sustainable Development. By understanding each stage of the value chain, the Group can improve its efficiency and enhance its positive social and environmental footprint.

Upstream	Activities & Services	Downstream	
Suppliers of raw materials	① Accommodation & Hospitality	Guests	
• Food & Beverage Suppliers	② Catering		
• Consumables Suppliers	③ Recreation		
• Suppliers of cleaning materials/ detergents	④ Conference organization		
Service providers	⑤ Wellness		
• Promotion and Advertising Services			
• Consulting Services			
• Cleaning and Disinfestation Services			
• Mechanical Equipment Maintenance Services			
• Laundry Services			
• Customer Recreation Services			

The Group's strategic goal is to build relationships of trust with its 1,300 suppliers, of whom only 140 are international (11%). Its relations are always based on honesty, mutual respect, mutual trust, transparency, and reliability.

The Group creates a sustainable supply chain, having as companions in this effort, its trusted suppliers. Since 2021, the Group has adopted the Procurement Policy and the "Sustainable Supplies – Initiative for a sustainable future" Program, as detailed in Chapter "3. Corporate governance practices". In addition, more information on the Group's contribution to local communities and the support of local producers is available in Chapter "5. Caring for people and the local community".

1.4 Memberships and awards

● GRI 2-28

The Group actively participates in organizations and bodies related to the industry, through which it expresses its views and promotes the principles of Sustainable Development.

Today, the Group is one of the most internationally recognized and awarded groups in the tourism industry, with 58 international and national awards and certifications. Below, the awards received by each of the hotels, as well as the Group as a whole (Creta Maris Resort, Tui Magic Life Candia Maris and Santo Pure Oia Suites & Villas) during the reporting period 2022, are presented.

Memberships

Metaxa Hospitality Group

GSTC
Global Sustainable Tourism Council

Greek Tourism Confederation (SETE)

Hellenic Hoteliers Federation (HHF)

Hellenic Chamber of Hotels (HCH)

Research Institute for Tourism (RIT)

Awards

Creta Maris Resort

World Travel Award:
Greece's Leading All-Inclusive Resort
Greece's Leading Sustainable Resort

Tripadvisor:
Travelers' Choice

Marie Claire Sustainability Awards:
Highly Commended "Best Sustainable Hotel"
& "Best Sustainable Hotel with Kids"

Greek Hospitality Awards:
Best Greek Green Resort

Kayak Travel Awards

TUI:
"TUI Quality Hotel"

HotelsCombined:
9 Rated by guests

Booking.com:
9,1/10 Traveller Review Awards

Travelmyth:
Top 10 Hotels for families in Crete

Hotels.com:
Loved by Guests All Inclusive Winner

TUI Magic Life Candia Maris

TUI:
"TUI Quality Hotel"

Santo Pure Oia Suites & Villas

World Travel Awards:
Greece's Best Resort Spa
Europe's Leading Boutique Resort
World's Leading Boutique Resort
Greece's Leading Island Villas

Greek Hospitality Awards:
Best Greek Hotel Dining Experience

Conde Nast Traveler:
Readers' Choice Awards
(4th in "Best Greek Hotels")

Tripadvisor:
Travellers' Choice Awards

Athinorama:
Greek Cuisine Award

Metaxa Hospitality Group

TTG Industry Awards:
Sustainability Initiative of the year Communities -
Finalist with initiative "Sustainable Supplies"

World Travel Awards:
Greece's Leading Hotel Group

Hellenic Responsible Business Awards:
Gold
Gold | Sustainable Development – Supply Chain award
for the Program "Sustainable Supplies – Initiative
for a sustainable future"

Greek Hospitality Awards:
Gold | Best Greek Hotel Brand

Metaxa Hospitality Group

Below, the certifications in force for 2022 that each of the Group's hotels has received are presented.

Certifications

Creta Maris Resort

TUV Austria Covid Shield	
Travelife Gold Certification	
TÜV Austria: ISO 22000 Food Safety Management System ISO 14001 Environmental Management System	
The Green Key Certification	
Greek Tourism Certification	
Ecarf Quality	
Bio Kouzina Gold	
Greek Breakfast	
DIO/Certification Scheme on Organic Products	
We do local Hospitality	
TUV Austria Water sports	
Blue flag Award	
Costa Nostrum Sustainable Beaches	

TUI Magic Life Candia Maris

Travelife Gold Certification	
The Green Key Certification	
Greek Tourism Certification	
Ecarf Quality	
HACCP	
Greek Breakfast	
We do local Hospitality	
Blue flag Award	
Costa Nostrum Sustainable Beaches	
DIO/Certification Scheme on Organic Products	
Bike friendly hotel	

Santo Pure Oia Suites & Villas

Boutique Hotel	
TÜV Austria Covid Shield	
Travelife Gold Certification	
TÜV Austria ISO 22000 Food Safety Management System	
DIO/Certification Scheme on Organic Products	
The Green Key Certification	
Greek Tourism Certification	
Greek Breakfast	
We do local Hospitality	

Metaxa Hospitality Group

2

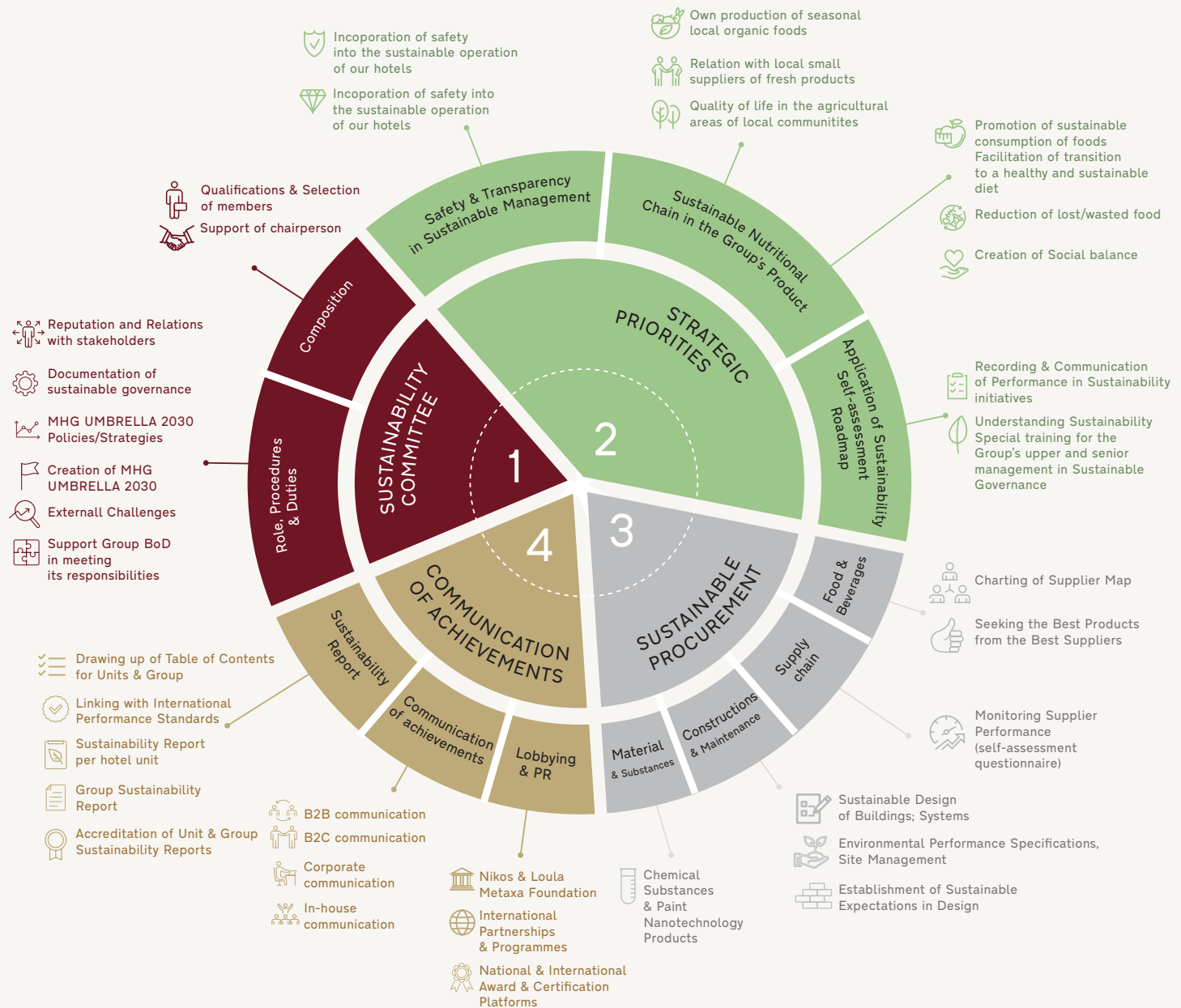# OUR JOURNEY TO SUSTAINABLE HOSPITALITY

2. Our journey to sustainable hospitality

2.1 Sustainable Development Strategy

● GRI 2-12 | GRI 2-13

The Group has formulated and implemented a Sustainable Development strategy with a "think global-act local" character and a time horizon of implementation by 2030. The BoD and the Group's senior management are responsible for developing, validating, and reviewing the strategy.

As described in the following figure, the strategy focuses on 4 areas of action:

Qualifications & Selection of members
Support of chairperson

Reputation and Relations with stakeholders
Documentation of sustainable governance
MHG UMBRELLA 2030 Policies/Strategies
Creation of MHG UMBRELLA 2030
Externall Challenges
Support Group BoD in meeting its responsibilities

Incoporation of safety into the sustainable operation of our hotels
Incoporation of safety into the sustainable operation of our hotels

Own production of seasonal local organic foods
Relation with local small suppliers of fresh products
Quality of life in the agricultural areas of local communitites

Promotion of sustainable consumption of foods Facilitation of transition to a healthy and sustainable diet
Reduction of lost/wasted food
Creation of Social balance

Recording & Communication of Performance in Sustainability initiatives
Understanding Sustainability Special training for the Group's upper and senior management in Sustainable Governance

Charting of Supplier Map
Seeking the Best Products from the Best Suppliers
Monitoring Supplier Performance (self-assessment questionnaire)

Sustainable Design of Buildings; Systems
Environmental Performance Specifications, Site Management
Establishment of Sustainable Expectations in Design

Chemical Substances & Paint Nanotechnology Products

Nikos & Loula Metaxa Foundation
International Partnerships & Programmes
National & International Award & Certification Platforms

B2B communication
B2C communication
Corporate communication
In-house communication

Drawing up of Table of Contents for Units & Group
Linking with International Performance Standards
Sustainability Report per hotel unit
Group Sustainability Report
Accreditation of Unit & Group Sustainability Reports

Composition
Role, Procedures & Duties
SUSTAINABILITY COMMITTEE
Safety & Transparency in Sustainable Management
Sustainable Nutritional Chain in the Group's Product
Application of Sustainability Self-assessment Roadmap
STRATEGIC PRIORITIES
Food & Beverages
Supply chain
Constructions & Maintenance
Material & Substances
SUSTAINABLE PROCUREMENT
Lobbying & PR
Communication of achievements
Sustainability Report
COMMUNICATION OF ACHIEVEMENTS

1
2
3
4

Sustainable Development oversight

● GRI 2-12 | GRI 2-13 | ATHEX C-G2 | ATHEX C-G4

For the most efficient supervision and management of Sustainable Development issues, the Group has established the Sustainability Committee, the structure and scope of which is described in detail in section "3. Corporate governance practices".

In 2022, within the framework of the Sustainability Committee, a special sub-committee entitled "Audit & Implementation Body" was established, aiming at the Group's more direct and holistic management of Sustainable Development issues, the alignment with the fields of application of the Sustainable Development strategy and the maximum utilization of the resulting benefits.

Regular members of the Body are the Deputy Chairman and 3 out of the total 14 members of the Sustainability Committee, while ad-hoc members are the Chairman of the Group and the chairman of Local Food Experts*.

The members of the Audit & Implementation Body propose, suggest, evaluate, and occasionally decide on Sustainable Development issues that are characterized as urgent, as well as on issues related to the Sustainable Development strategy (e.g., issues related to the Group's strategic priorities, sustainable procurement, communication of achievements and the Sustainability Committee).

* Local Food Experts is a company that is part of the innovative activity of the Social Cooperative Enterprises that in recent years are considered as the Third Pathway sector among EU countries' business activities.

At the same time, the members of the subcommittee meet for discussion and undertake the role of informing the Sustainability Committee about actions, collaborations and initiatives that may arise, before proceeding with their implementation.

For 2022, no emergency or urgent matters were recorded. Specifically, the Audit & Implementation Body:

⌄ Offers flexibility, speed, and a holistic approach to managing requests, proposals and ideas related to the Group's Sustainable Development issues.

⌄ Informs, proposes, evaluates, and recommends to the Sustainability Committee strategic issues for which the knowledge and agreement of all members of the Sustainability Committee is required.

⌄ Executes decisions of the Sustainability Committee.

⌄ Meets on an ad hoc basis.

2.2 Stakeholder engagement

●GRI 2-12 | GRI 2-29 | ATHEX C-S1 | ATHEX SS-S8

Regular stakeholder engagement aims to better understand stakeholder interests and needs, as well as to identify issues related to Sustainable Development that need to be resolved by the Group. The term "stakeholders" is defined as individuals or groups of individuals whose interests are or may be affected by the Group's activities.

For the Group, the main stakeholder groups are the following:

① Board of Directors / Shareholders
② Employees
③ Suppliers
④ Partners
⑤ Guests
⑥ Financial Institutions
⑦ Regulatory Authorities
⑧ Industry Associations / Organizations
⑨ Media
⑩ Local Community

In particular, in the Group's programs "Sustainable Procurement - Action for a sustainable future" and "Sustainable Hotel Farming" consultation has been carried out with the participating stakeholders (e.g., suppliers) through telephone and face-to-face communication. Further information on the programs is available in Chapters "3. Corporate governance practices" and "4. Our action for an environmentally sustainable hospitality". In addition, all hotels of the Group have implemented actions to record the satisfaction of guests for the quality of services, both during their stay and after they have checked out. To this end, a questionnaire has been created for each hotel and is available to guests during their stay, so that any problems that arise can be resolved immediately.

In case guests have checked out, internal procedures have been created (special feedback platform), so that any complaints are taken into account for improvement and resolution.

The following table presents the stakeholder categories, the engagement methods, and the frequency of engagement with them. To determine the Group's stakeholders, a detailed mapping was carried out as part of the Materiality Analysis process for the year 2022.
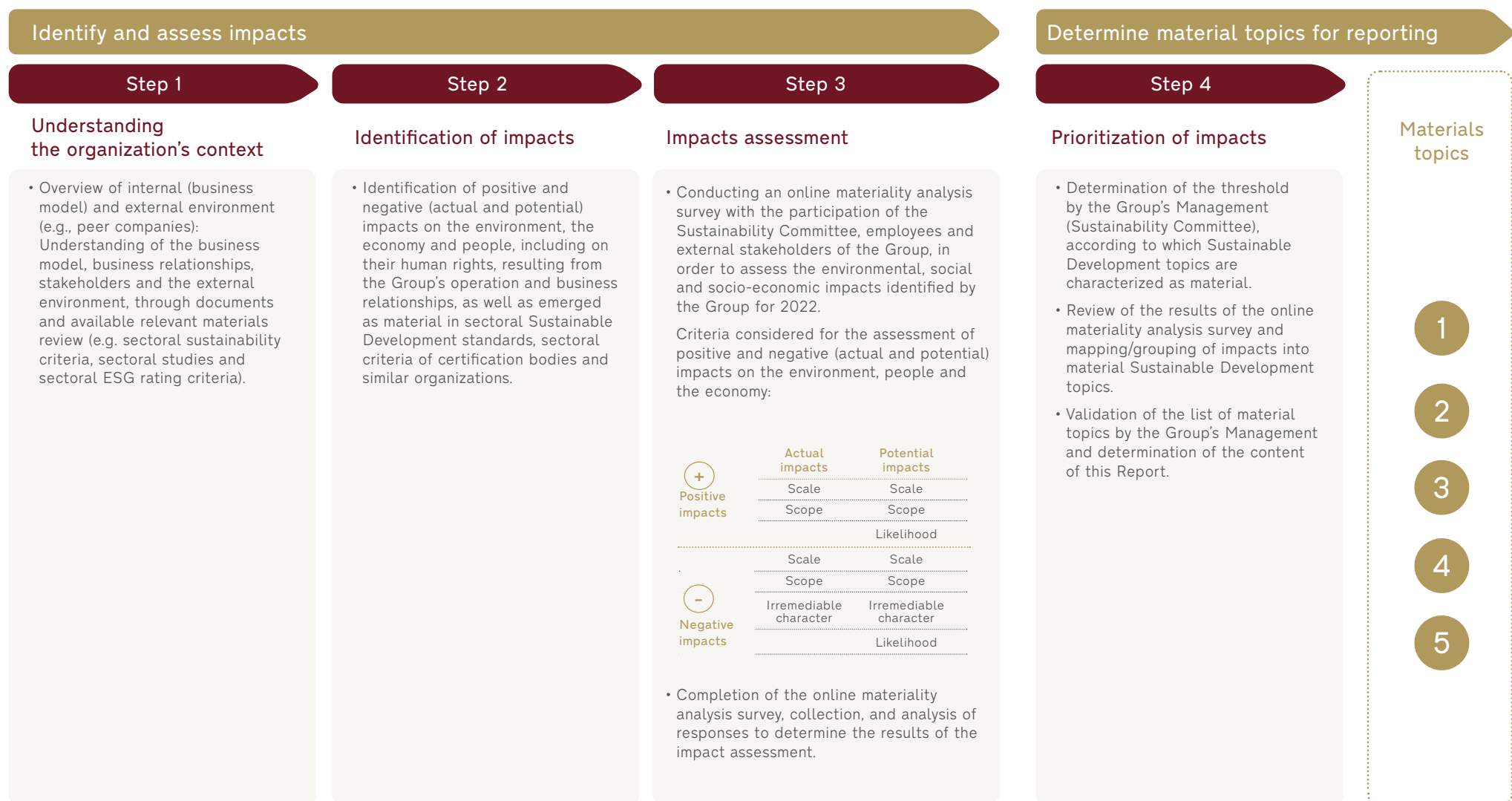
Stakeholders	Engagement method	Frequency of engagement
Board of Directors/Shareholders	General Meeting of Shareholders, Board of Directors	Annual, monthly
Employees	Meetings, updates, Bulletin boards, Group Website, Social Media	Continuous
Suppliers	Regular contacts/visits, Inspections, Sustainable Development Report, Social Media	Continuous
Partners	Regular contacts/visits, Inspections, Sustainable Development Report, Social Media	Continuous
Guests	Group Website, Sustainable Development Report, Social Media	Continuous
Financial Institutions	Conferences and events, Corporate publications and articles, Sustainable Development Report, Social Media	Continuous
Regulatory Authorities	Conferences and events, Sustainable Development Report, Social Media	Continuous
Industry Associations /Organizations	Corporate publications and articles, Personal communication, Conferences and events, Studies and corporate reports, Group Website, Sustainable Development Report, Social Media	Continuous
Media	Open dialogue events, Conferences and consultation events, Studies and corporate reports, Group Website, Sustainable Development Report, Social Media	Continuous
Local Community	Open dialogue events, Conferences and consultation events, Studies and corporate reports, Group's Website, Sustainable Development Report, Social Media	Continuous

2.3 Materiality analysis

● GRI 2-12 | GRI 2-14 | GRI 3-1 | GRI 3-2 | GRI 3-3 | ATHEX C-G3

In the context of the Group's continuous evolution and improvement in Sustainable Development, in 2022, the Group performed for the first time a materiality analysis process adopting the methodology of the new international GRI Standards 2021. The process of determining the material topics is based on the identification and assessment of the impacts created or likely to be created, by the Group's activity on the economy, the environment, and people, including its impacts on human rights. To update its impacts on Sustainable Development, the Group will conduct a materiality analysis on an annual basis. The materiality analysis for the reporting period 2022 comprised of the the following steps:
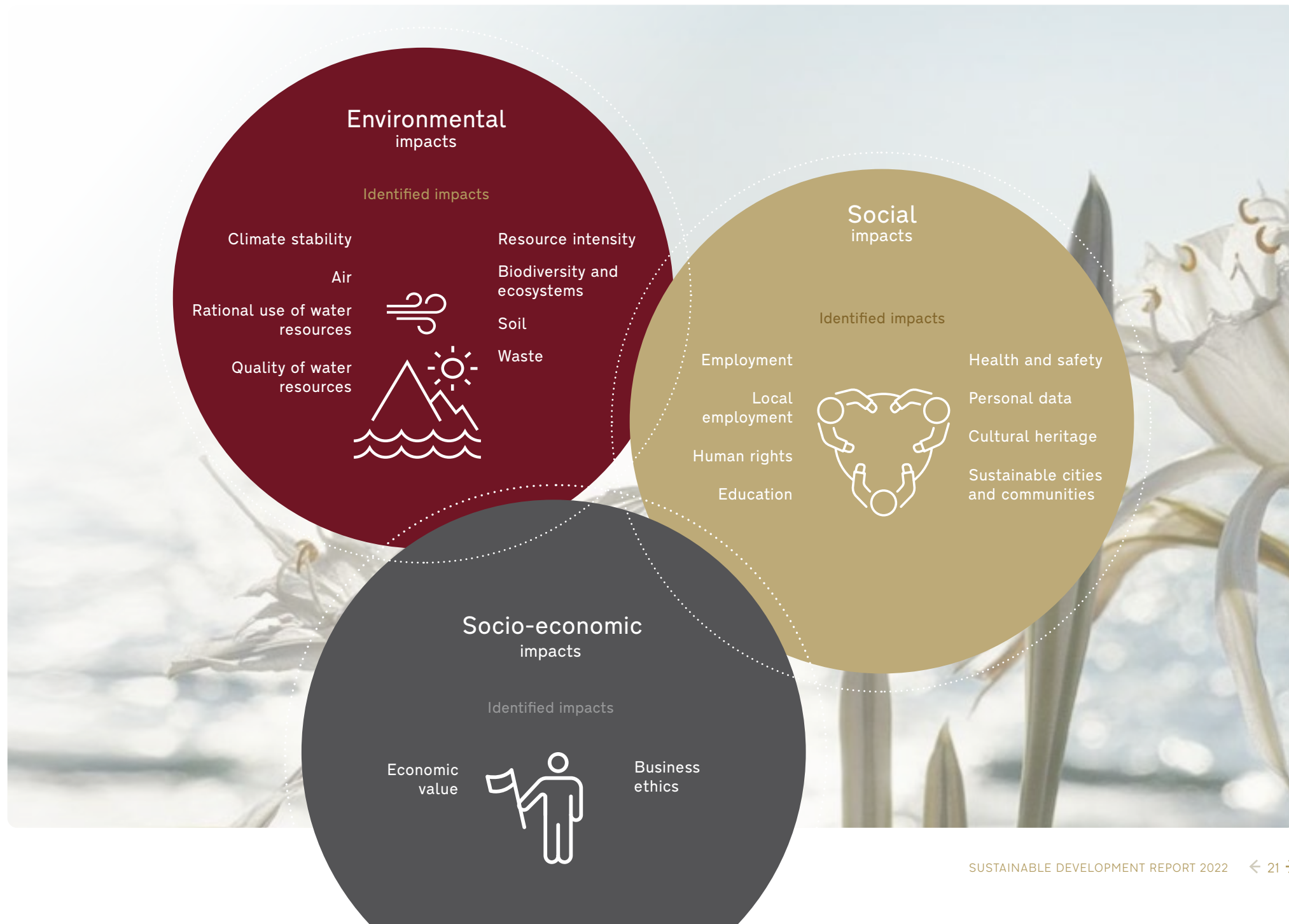
Identify and assess impacts

Step 1
Understanding the organization's context

• Overview of internal (business model) and external environment (e.g., peer companies): Understanding of the business model, business relationships, stakeholders and the external environment, through documents and available relevant materials review (e.g. sectoral sustainability criteria, sectoral studies and sectoral ESG rating criteria).

Step 2
Identification of impacts

• Identification of positive and negative (actual and potential) impacts on the environment, the economy and people, including on their human rights, resulting from the Group's operation and business relationships, as well as emerged as material in sectoral Sustainable Development standards, sectoral criteria of certification bodies and similar organizations.

Step 3
Impacts assessment

• Conducting an online materiality analysis survey with the participation of the Sustainability Committee, employees and external stakeholders of the Group, in order to assess the environmental, social and socio-economic impacts identified by the Group for 2022.

Criteria considered for the assessment of positive and negative (actual and potential) impacts on the environment, people and the economy:

	Actual impacts	Potential impacts
+ Positive impacts	Scale	Scale
	Scope	Scope
		Likelihood
− Negative impacts	Scale	Scale
	Scope	Scope
	Irremediable character	Irremediable character
		Likelihood

• Completion of the online materiality analysis survey, collection, and analysis of responses to determine the results of the impact assessment.

Determine material topics for reporting

Step 4
Prioritization of impacts

• Determination of the threshold by the Group's Management (Sustainability Committee), according to which Sustainable Development topics are characterized as material.

• Review of the results of the online materiality analysis survey and mapping/grouping of impacts into material Sustainable Development topics.

• Validation of the list of material topics by the Group's Management and determination of the content of this Report.

Materials topics

1
2
3
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5

The identified impacts

During the materiality analysis process, it was identified that the Group's operation creates or is likely to create positive and negative impacts on the environment, the economy, and people, as follows:
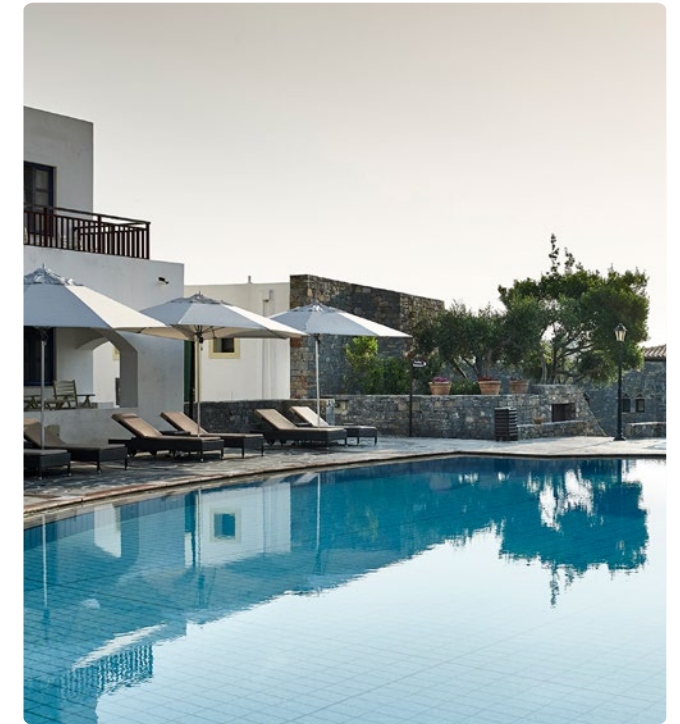
Environmental impacts

Identified impacts

Climate stability

Air

Rational use of water resources

Quality of water resources

Resource intensity

Biodiversity and ecosystems

Soil

Waste

Social impacts

Identified impacts

Employment

Local employment

Human rights

Education

Health and safety

Personal data

Cultural heritage

Sustainable cities and communities

Socio-economic impacts

Identified impacts

Economic value

Business ethics

Material topics

● GRI 3-2 | GRI 3-3 | ATHEX C-G3

Based on the results of the impact assessment, the grouping of impacts into topics and the threshold set by the Management, the material topics that are included in this Report are presented in the table below.

Type of impact	Material Topics	Positive impacts (+)	Negative impacts (−)	Correlation with the Sustainable Development Goals (SDGs)
Environmental	Climate stability	✓	✓	7 13
	Biodiversity, ecosystems and soil	✓		6 14 15
		✓	✓	12 15
	Water resources	✓	✓	6 14
		✓		6 14
	Waste and Resource intensity	✓	✓	12 15
		✓	✓	3 6 12
Social	Employment Practices & Human Rights	✓		8
		✓		8
		✓		5 16
	Health and safety	✓		3
Socio-economic	Business ethics	✓		16 17

Placing Sustainable Development at the heart of its operation, the Group makes continuous efforts to enhance its positive impacts on the environment, the economy, and people, including on their human rights, as well as to prevent or reduce negative impacts.

Actions to mitigate and address actual and potential negative impacts, as well as actions to reinforce actual and potential positive impacts on the above material topics, are described in more detail in the following chapters.

3

CORPORATE GOVERNANCE PRACTICES

MESSAGE
2022 AT A GLANCE
1. THE GROUP
2. SUSTAINABLE HOSPITALITY
3. CORPORATE GOVERNANCE PRACTICES
4. ENVIRONMENT
5. PEOPLE & COMMUNITY
6. APPENDICES

3. Corporate governance practices

Organisational Structure

● GRI 2-9 | GRI 2-11 | GRI 2-17 | GRI 2-20 | GRI 2-21 | ATHEX C-G1

The Group's Board of Directors (BoD) is its supreme executive body. In addition, the two economic entities of the Group, Touristic Enterprises Company - TEAV S.A. and Marmari Hotel - Touristic - Commercial - Transport Enterprises Company S.A., consist of separate BoDs.

The composition and responsibilities of the BoD are determined by the Group's Articles of Association as well as by the current legislative and regulatory framework. As the supreme management body, the BoD sets the guidelines and ensures the effective implementation of the Group companies' strategy. The term of office of the BoD is five years and there is no official distinction between executive and non-executive members, as the company does not fall within the scope of Law No. 4706/2020. However, there is an informal distinction as illustrated in the table below. There are no independent members on the BoD of the Group. 4 members of the Board are in the age group over 50 years old and 1 in the age group 30-50 years old. 3 women participate in the BoD (60% of the total members of the Board). The BoD does not include under-represented social groups and all members of the Group have experience and knowledge relevant to the tourism industry. The participation of the members of the BoD in other BoDs outside the Group does not constitute a limiting factor in the exercise of their duties.
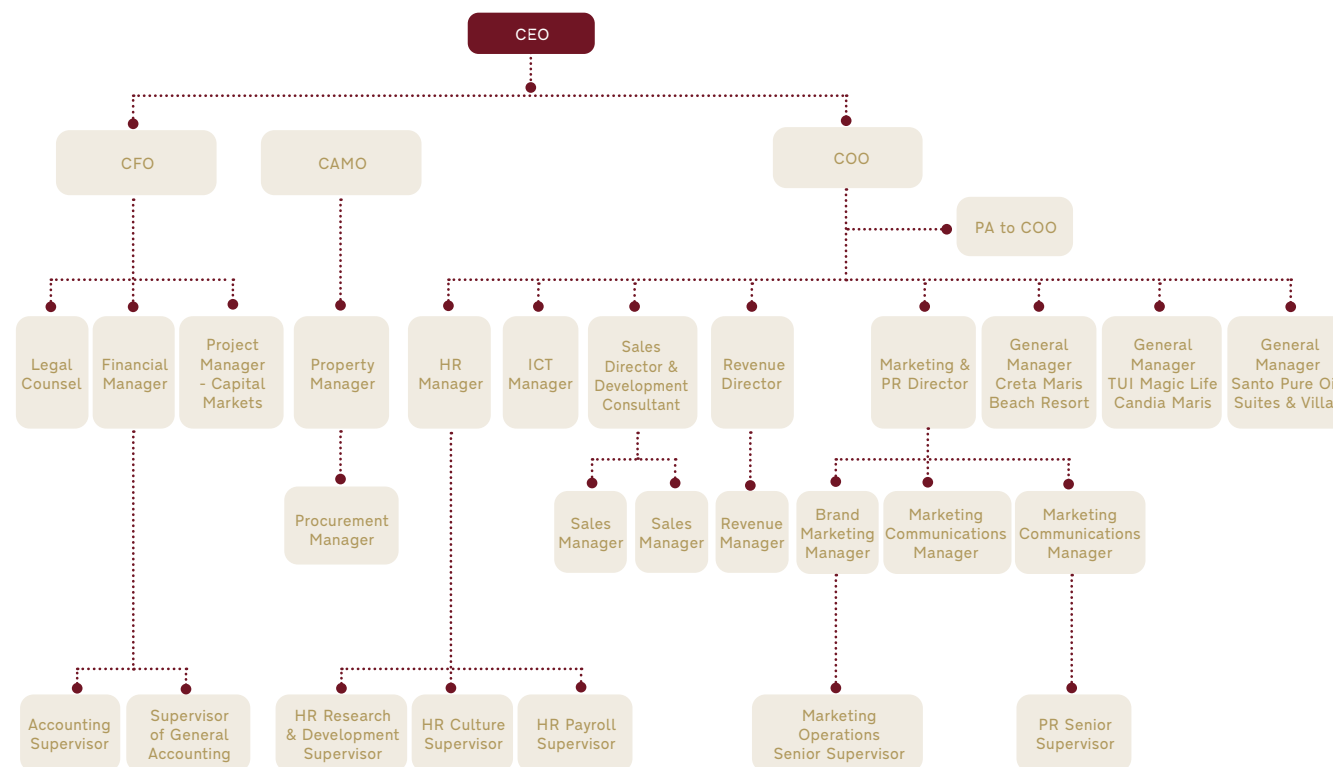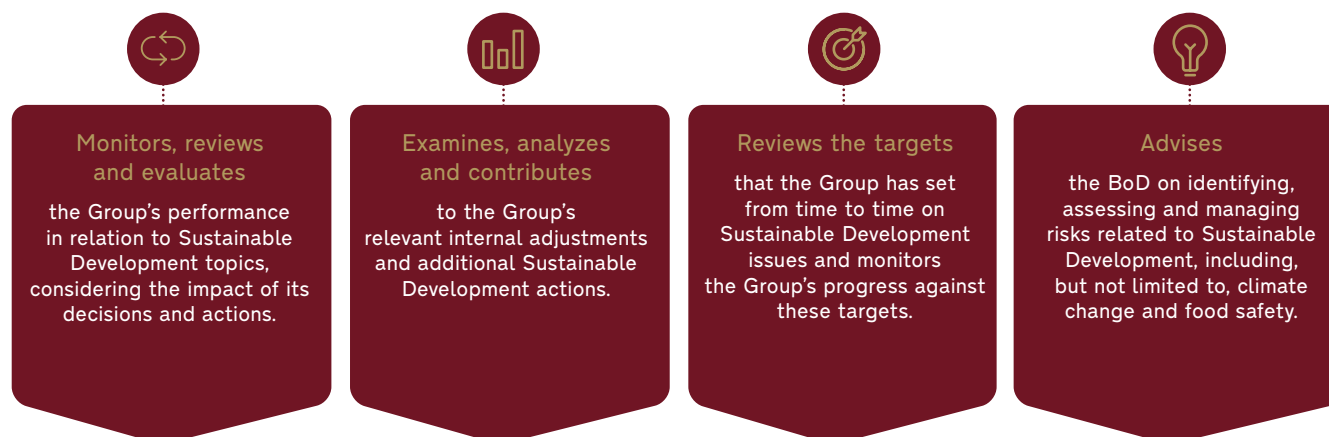
All executive members of the BoD are informed and trained on Sustainable Development topics by attending relevant seminars or workshops. Currently, there is no formal Performance Assessment Process of the highest governance body. The remuneration of Executive BoD Members consists of contracts of paid mandate contracts and annual remuneration approved by the General Assembly in accordance with Law 4548/2018. The "non-executive" BoD members receive remuneration when approved by the General Assembly.

In the table below, the Group's annual total compensation ratio has been calculated by dividing the annual total compensation of the CEO to the median annual total compensation for all of the organization's employees excluding the CEO.

	2022	2021	2020
Annual total compensation ratio	15.8	18.7	17.4
Change in the annual total compensation ratio	-0.004	1.42	-

Group's Board of Directors

Theano-Evangelia Metaxa	Chairman – Non-Executive Member
Andreas Metaxas	Deputy Chairman – Executive Member (CEO)
Rodanthi Metaxa	Member – Non-Executive Member
Marina Metaxa	Member – Non-Executive Member
Ioannis Metaxas	Member – Executive Member (CAMO)

The following diagram illustrates the organizational structure of the Group:

Metaxa Hospitality Group

Committees

● GRI 2-13

The Group's Sustainability Committee was established in 2021 and helps shape the Group's policies, strategies and programs related to Sustainable Development topics. Within the framework of the Sustainability Committee, a special sub-committee entitled "Audit & Implementation Body" was also established, more information on which can be found in Chapter "2. Our path towards sustainable hospitality". Sustainable Development topics are discussed on a case-by-case basis in meetings between the Management and the Sustainability Committee. The Sustainability Committee:

Monitors, reviews and evaluates	Examines, analyzes and contributes	Reviews the targets	Advises
the Group's performance in relation to Sustainable Development topics, considering the impact of its decisions and actions.	to the Group's relevant internal adjustments and additional Sustainable Development actions.	that the Group has set from time to time on Sustainable Development issues and monitors the Group's progress against these targets.	the BoD on identifying, assessing and managing risks related to Sustainable Development, including, but not limited to, climate change and food safety.

The Sustainability Committee consists of the following 14 members who are members of the BoD, Group executives and strategic partners:

1	Chairman	Andreas Metaxas	Chief Executive Officer, CEO
2	Deputy Chairman	Konstantinos Triantafyllis	Marketing & PR Director
3	Member	Giorgos Skouras	Chief Financial Officer, CFO
4	Member	Giannis Metaxas	Chief Asset Management Officer, CAMO
5	Member	Manos Bormpoudakis	Chief Operating Officer, COO
6	Member	Nikos Vlasiadis	General Manager, Creta Maris Resort
7	Member	Serafeim Karouzakis	General Manager, TML Candia Maris
8	Member	Christos Seizis	General Manager, Santo Pure Oia Suites & Villas
9	Member	Nikos Sfakianakis	Sales Director & Development Consultant
10	Member	Laurent Barelier	Revenue Director
11	Member	Loula Metaxa	HR Manager
12	Member	Christos Kouteranis	Property Manager
13	Member	Giorgos Gatzilakis	Project Manager Capital Markets
14	Member	Sotiris Bampagiouris	CEO, Local Food Experts s.c.e.

3.1 Business ethics

Management approach

● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Socio-economic	Business ethics	⊕ (actual)	16 PEACE, JUSTICE AND STRONG INSTITUTIONS / 17 PARTNERSHIPS FOR THE GOALS

During its operation, the Group creates actual positive impacts in terms of ensuring regulatory compliance and business conduct, through its structure and operation. Positive impacts are created by the operation of the Sustainability Committee, the implementation of a complaint management mechanism, the Data Security Policy and the Personal Data Protection Regulation, as well as the implementation of the "Sustainable Supplies" program, for managing more efficiently the supply chain of local suppliers.

Staff handbook

● GRI 2-23, GRI 2-24, GRI 2-27, ATHEX C-G5

The Group has developed the staff handbook, which constitutes a point of reference for all its employees who are trained and informed about its content upon recruitment. Through the staff handbook, the Group manages to communicate its commitments to ensure responsible business and the ethical behavior of its employees through relevant meetings, trainings, and events to internal and external stakeholders.

Indicatively, the staff handbook includes the following sections:

- Group values, philosophy, and mission
- Corporate Social Responsibility
- Environmental Awareness
- Employees attire
- Protection of human rights
- Health and Safety
- Human Resources
- Safety Rules
- Ethical behavior of employees
- Labour issues

The information handbook has been approved and bears the signature of the Group's CEO. The handbook is sent electronically to its stakeholder groups by e-mail. The Group's effort to ensure its business conduct and regulatory compliance is also reflected in the fact that for 2022 there were no incidents of non-compliance with laws and regulations.

Problem solving and complaint management mechanism

● GRI 2-16 | GRI 2-25 | GRI 2-24 | GRI 2-26 | ATHEX SS-S9

The Group has developed a problem-solving and complaint management mechanism. Through it, the Group enables its employees, partners and suppliers to express their concerns or complaints (e.g., labor relations issues, nutrition, transportation, working hours, accommodation). Employees can express these to the Management, either in writing, via email to the Human Resources Department (hr@metaxahospitality.gr), or in person to the Management. In addition, employees can and should discuss their concerns directly with their supervisors. Supervisors, if they are unable to provide a solution, and depending on the nature of the problem, may request the assistance of the Human Resources Department. Regarding partners and suppliers, any concerns or complaints are communicated to the Manager of each hotel, or to the head of each department concerned.

The mechanism has been designed by employees of the Group and specifically by employees of the Human Resources Department. In order to improve its operation, it has been planned for the coming years to receive feedback through the Satisfaction and Culture Survey, which is conducted with the participation of all employees.

In addition, the Group has a complaint management system that monitors, records and manages visitors' concerns and problems, activating the Management team for their optimal resolution.

This mechanism includes:

Complaint management during the guest's stay — Resolution time 24 – 48 hours

- Recording of incident.
- Notification of the competent department as appropriate to the incident.
- Immediate incident resolution through customer service actions.
- Follow up with the client, after the incident is resolved, aimed at changing client's negative review.

Complaint management subsequent to the guest's stay

- Recording of incident.
- Operation team update.
- Feedback from the operation team about the incident.
- Electronic communication with the client, providing information that the incident has been communicated to the Group and that it is taking all the necessary measures to ensure that it improves its procedures and the quality of its services.

In 2022, no critical concerns were communicated to the Group's BoD.

Employee Disciplinary Procedure

● GRI 2-24

The Group has a Disciplinary Procedure in place to ensure a fair and effective system for dealing with unsatisfactory performance and behavior of employees. An employee warning can be made informally (orally) or formally (in written), with the ultimate goal of employee compliance. There are the following four warning levels:

1. **Grey level:** Verbal warning.
2. **Yellow level:** More than one verbal warning/discussion.
3. **Orange level:** First written warning.
4. **Red level:** Second written warning and provision of in person information.

Metaxa Hospitality Group

Personal Data Privacy Policy

● GRI 2-24 | ATHEX C-G6

Respect for people's private life and rights is an unsurpassed value for the Group. Information systems must be protected to the greatest extent possible. For this purpose, a Personal Data Privacy Policy is applied, with the aim of ensuring confidentiality and guaranteeing the proper functioning of information systems. The Group has:

- Data Protection Officer (DPO) internally within the Group.
- External partner as a Data Protection Officer consultant to control and provide training on relevant issues.
- Data Protection Coordinator (DPC) at Creta Maris Resort, TUI Magic Life Candia Maris and Santo Pure Oia Suites & Villas.
- Information Security Officer (ISO).

The Group recognizes the importance of personal data protection. Therefore, the Group implements the General Data Protection Regulation (GDPR) to process personal data in accordance with European legislation. The Group's stakeholders are at the core of its commitments and as such, the respect and protection of their personal data constitutes a main concern.

In this context, the Group complies with the key data protection principles and implements the following policy to ensure that personal data is processed correctly:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

The Group ensures employees' cooperation in maintaining guests' privacy, through annual training that is conducted at the beginning of the tourist season. Every new member to the Metaxa Hospitality Group, with particular emphasis on those that hold key personal data processing positions, such as the HR, accounting, reservations, Marketing, sales, etc. departments, receive training at the beginning of their recruitment.

Sustainable Supplies

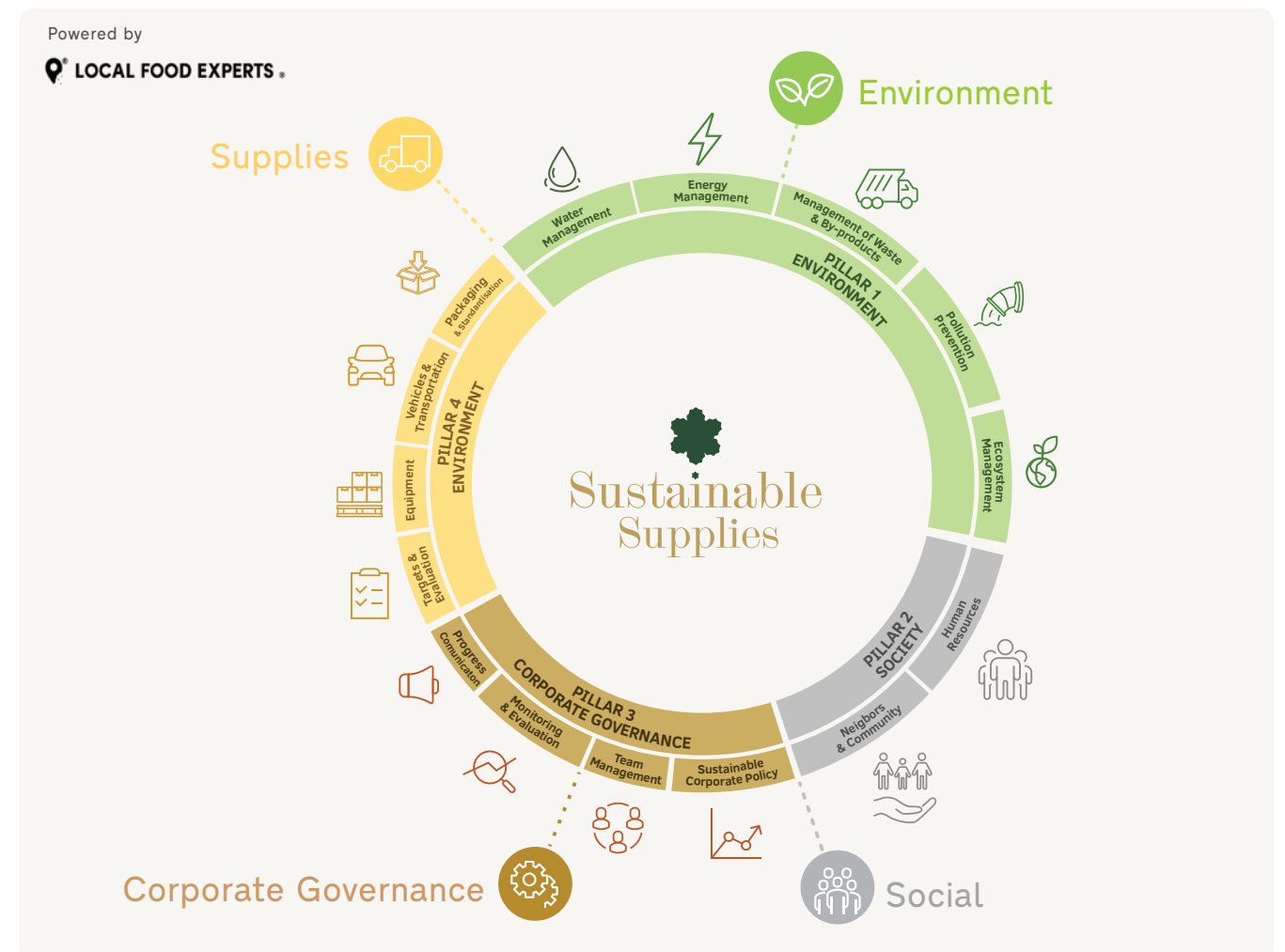● GRI 2-6 | GRI 2-23 | GRI 2-24 | ATHEX C-S8

The Group, since 2019, applies a Procurement Policy that is implemented based on an ever-growing relationship with national and local producers and suppliers to promote local products and ensure higher levels of quality for its customers.

In the context of the Procurement Policy, the Group:

1. Supports local suppliers, providing support to the local economy and allowing its guests to try the high-quality products that the place has to offer.

2. Contributes to the reduction of greenhouse gas emissions resulting from the transport of products, as the majority is sourced from local suppliers and not international ones.

3. Seeks inclusion of product codes from suppliers holding responsible management certifications (e.g., GGN Global Gap Number certification, Good Agricultural Practices (GAP), organic product certifications).

4. Chooses products that are environmentally friendly (e.g., FSC certified), products that participate in the Fair-Trade movement and products that are available in large packages rather than individually, to achieve material packaging savings (e.g., plastic).

5. Chooses the purchase of state-of-the-art (electronic and electrical) equipment in order to achieve a smaller environmental footprint due to better technological performance.

In addition to the Procurement Policy, in 2021, the Group took the initiative to plan and implement the "Sustainable Supplies – Initiative for a sustainable future" program in collaboration with Local Food Experts. The program is a novel initiative for the Greek hospitality industry, with the participation of 11 partners/suppliers, initially from the Food & Beverages sector, while there are plans to extend it to other categories in the future.

The program's participants will receive training in sustainable business practices in relation to the environment, society, corporate governance and practices in managing their own supply chain. A 360° roadmap has been developed for the program, which ties in with the international Society – Economy – Environment criteria (ESG Performance) and is based on 4 pillars: **Environment, Society, Governance, Supplies.**
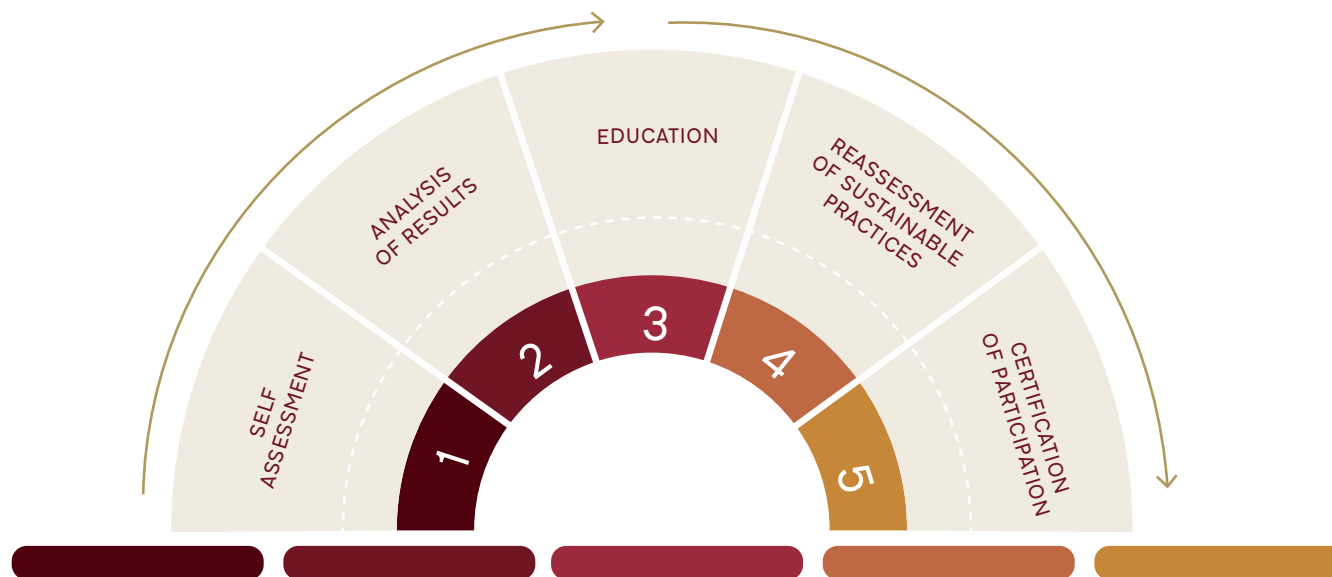
The program "Sustainable Supplies - Initiative for a sustainable future", is implemented in 5 stages and consists of three cycles. The first cycle of the Program was completed in 2022 and concerns the self-assessment of supplier performance (stage 1) and the analysis of its results (stage 2). The second cycle is scheduled to start in 2023 and will include the education (stage 3), while the third cycle concerning the reassessment of sustainable practices (stage 4) and the award of a certification of the suppliers' participation (stage 5), will be implemented in 2024.

Performance

GRI 205-3 | GRI 206-1 | GRI 418-1 | ATHEX A-G2

In 2022, the Group implemented all the necessary internal procedures and policies to ensure the integrity of its business activity. As such, in 2022 there were:

0
• Zero submissions of complaints and/or observations about illegal, irregular, or unethical actions of the staff.

0
• Zero public legal cases regarding corruption brought against the Group or its employees.
• Zero legal actions pending or completed regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the Group has been identified as a participant.

0
• Zero monetary losses incurred as a result of business ethics violations.

0
• Zero confirmed incidents of corruption.
• Zero confirmed incidents of corruption that led to the removal or disciplinary action of employees.
• Zero confirmed incidents of corruption that led to the termination or non-renewal of cooperation with partners.

2
• 2 substantiated complaints received concerning breaches of customer privacy, that did not result in data loss due to timely intervention by IT. There is no documented incident related to data loss.

1 — SELF ASSESSMENT

The Group provides participants with the KPIs per activity sector, based on global ESG standards, through 188 questions in relation to the sustainable practices that they follow:
• Sustainable Governance
• Water Management
• Management of Waste & By Products
• Ecosystem Management,
• Human resources
• Neighbours & Community
• Supplies & Markets
• Infection Prevention
• Energy Management

2 — ANALYSIS OF RESULTS

The results of the first evaluation are processed by the team of experts and set the educational priorities of the program.

3 — EDUCATION

The training stage includes open discussions, study and working groups in the form of online or in-person meetings.

4 — REASSESSMENT OF SUSTAINABLE PRACTICES

Monitoring the improvement and application of sustainable business principles.

5 — CERTIFICATION OF PARTICIPATION

By the end of the programme, suppliers will have:
• Understood the principles of sustainable development issues related to corporate governance.
• Gained substantial knowledge on sustainable practices in the food sector.
• Gained tools and novel, readily applicable sustainability practices.

4

OUR ACTIONS FOR AN ENVIRONMENTALLY SUSTAINABLE HOSPITALITY

4. Our actions for an environmentally sustainable hospitality

4.1 Climate stability

Management approach

● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Environmental	Climate stability	(+) (−) (actual)	7 AFFORDABLE AND CLEAN ENERGY ☀ 13 CLIMATE ACTION 🌍
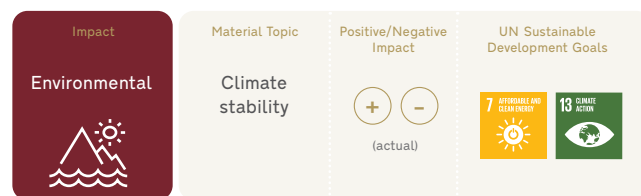
Direct and indirect greenhouse gas emissions are released from the operation of the Group's hotels, the activity of their guests and the purchase of products and services. To mitigate this negative effect, the Group implements energy saving practices, the use of renewable energy sources and the implementation of monitoring and recording systems of direct and indirect greenhouse gas emissions. In addition, the Creta Maris Resort in Crete implements an ISO 14001 certified environmental management system. By 2025, TUI Magic Life Candia Maris and Santo Pure Oia Suites & Villas are also expected to be certified.

Energy transition in hospitality

● GRI 302-1 | GRI 305-1 | GRI 305-2 | ATHEX C-E1 | ATHEX C-E2 | ATHEX C-E3

One of the main points on which the Group focuses its strategy for Sustainable Development is the reduction of energy consumption. The Group understands that responsible energy management begins with the systematic monitoring and recording of the quantities of energy produced and consumed.

The Group produces energy from a photovoltaic system at the Creta Maris Resort, generating 143,947kWh that accounts for 2.2% of the resort's total energy consumption. In addition, from 2023 the Group will start operating a photovoltaic park in Northern Greece.

Furthermore, to improve its carbon footprint, the Group has proceeded with the following energy saving actions:

Replacement and installation of new energy recovery systems from air conditioning and ventilation of internal common areas, aiming at heating water for use.

Using liquid propane (gas) in kitchens facilities.

Gradual replacement of incandescent and economy light bulbs with LED light bulbs in 90% of the Group's hotel facilities.

Implementation and operation of a modern Building Energy Management System (BMS), in lighting, water heating management and air conditioning in the Creta Maris Resort and Santo Pure hotels, with the aim of optimizing operations and controlling energy consumption.

Setting of air conditioners (Fun Coil Unit – FCU) to a temperature that ensures maximum comfort and optimal energy consumption (temperature adjustment between 21-24 degrees Celsius depending on the outdoor weather conditions).

Magnetic cards in all rooms, ensuring that all electrical appliances (except refrigerators) are turned off when guests leave their rooms.

Replacement and installation of energy-efficient electrical equipment (e.g., A+++ air-conditioning systems, refrigerators, computers, photocopiers).

Systemic procedures for the maintenance and proper cleaning of all energy installations.

The main goal of the Group for the next year is to obtain certification according to LEED, for Santo Mine Oia Suites, which is under construction in Santorini and is expected to be operational within 2024.
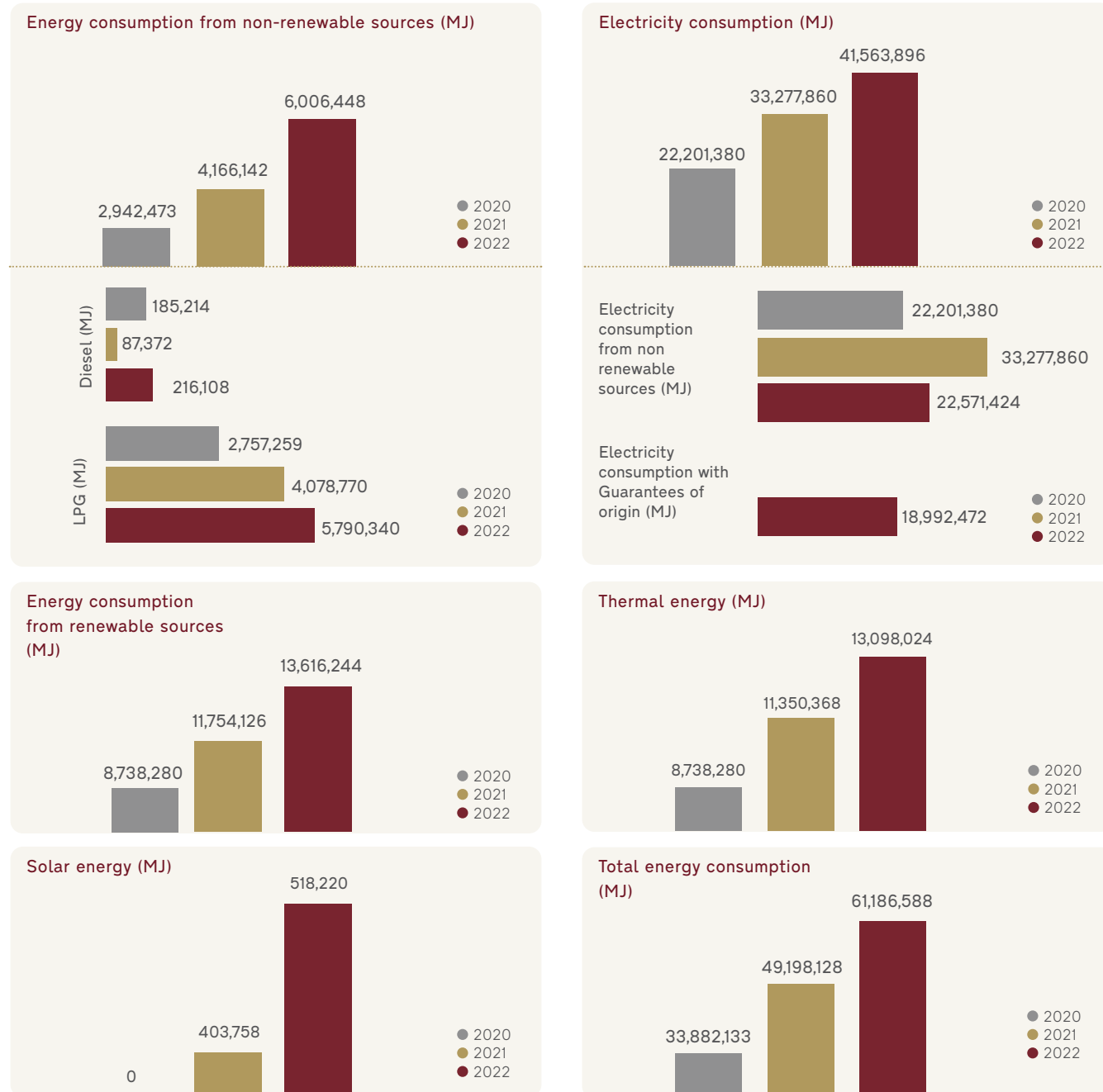
Direct and indirect greenhouse gas emissions

● GRI 302-1 | ATHEX C-E3

The operation of the hotels, as well as the services provided by the Group, leads to the release of direct and indirect emissions of greenhouse gases into the atmosphere. To improve its environmental footprint, the Group calculates and records its direct and indirect greenhouse gas emissions. In 2022, the direct emissions of the Group amounted to 479 tn CO_2e while the indirect ones to 2,692 tn CO_2e.

Energy consumption within the Group

● GRI 302-1 | ATHEX C-E3

Energy consumption from non-renewable sources (MJ)

- 2,942,473 (2020)
- 4,166,142 (2021)
- 6,006,448 (2022)

● 2020 ● 2021 ● 2022

Diesel (MJ)
- 185,214 (2020)
- 87,372 (2021)
- 216,108 (2022)

LPG (MJ)
- 2,757,259 (2020)
- 4,078,770 (2021)
- 5,790,340 (2022)

● 2020 ● 2021 ● 2022

Electricity consumption (MJ)

- 22,201,380 (2020)
- 33,277,860 (2021)
- 41,563,896 (2022)

● 2020 ● 2021 ● 2022

Electricity consumption from non renewable sources (MJ)
- 22,201,380 (2020)
- 33,277,860 (2021)
- 22,571,424 (2022)

Electricity consumption with Guarantees of origin (MJ)
- 18,992,472 (2022)

● 2020 ● 2021 ● 2022

Energy consumption from renewable sources (MJ)

- 8,738,280 (2020)
- 11,754,126 (2021)
- 13,616,244 (2022)

● 2020 ● 2021 ● 2022

Thermal energy (MJ)

- 8,738,280 (2020)
- 11,350,368 (2021)
- 13,098,024 (2022)

● 2020 ● 2021 ● 2022

Solar energy (MJ)

- 0 (2020)
- 403,758 (2021)
- 518,220 (2022)

● 2020 ● 2021 ● 2022

Total energy consumption (MJ)

- 33,882,133 (2020)
- 49,198,128 (2021)
- 61,186,588 (2022)

● 2020 ● 2021 ● 2022

Metaxa Hospitality Group

●GRI 302-1 | ATHEX C-E3

Total energy consumption (MWh)

9,412 — 2020
13,666 — 2021
16,996 — 2022

● 2020
● 2021
● 2022

Percentage of electricity consumed over total energy consumption (%)

65.53%
67.64%
67.93%

Percentage of renewable energy sources in total energy consumption (%)

25.79%
23.89%
53.29%

Energy from renewable sources (fuels + electricity) (MWh)

2,427.30 — 2020
3,265.04 — 2021
9,058 — 2022

● 2020
● 2021
● 2022

Total energy production (MWh)

2,427.30 — 2020
3,265.04 — 2021
3,782.3 — 2022

● 2020
● 2021
● 2022

Percentage of renewable energy sources in total energy produced (%)

100%

● 2020
● 2021
● 2022

- The reduction of Diesel and LPG in 2021 is due to investments in energy recovery. As a result, the consumption of oil and LPG decreased, while in 2022 they increased due to construction projects, where there was no electricity and oil had to be used.
- Diesel consumption by company cars has not been recorded for the years 2022, 2021 and 2020.
- In 2020 there was no energy consumption from renewable sources.
- The requirements of the GRI 302-1c disclosure are met given that there is no heating, cooling, or steam consumption.
- The disclosure requirements of GRI 302-1d are met given that there is no sale of electricity, heating, cooling, or steam.

●305-1 | ATHEX C-E1

Scope 1 emissions (t CO$_2$e)

	2022	2021	2020
Total direct emissions of greenhouse gases	479.05	317.15	253.89
CO$_2$	359.48	248.73	176.88
CH$_4$	7.24	5.09	3.46
N$_2$O	112.33	63.33	73.54
Biogenic CO$_2$ emissions	0	0	0

The standards, methodologies, assumptions and/or calculation tools used to calculate Scope 1 emissions have been based on Greenhouse gas reporting: conversion factors 2020, GOV.UK.

●305-2 | ATHEX C-E2

Scope 2 emissions (t CO$_2$e)

	2022	2021	2020
Location-based emissions (in tn CO$_2$e)	2,691.72	2,155.11	1,437.79
Which gases included in the calculation of indirect emissions (π.χ. CO$_2$, CH$_4$, N$_2$O, HFCs, PFCs, SF$_6$, NF$_3$, or all types)?	CO$_2$, CH$_4$, N$_2$O		

The standards, methodologies, assumptions and/or calculation tools used to calculate Scope 2 emissions have been based on Greenhouse gas reporting: conversion factors 2020, GOV.UK.

Metaxa Hospitality Group

4.2 Biodiversity, ecosystems and soil

Management approach

● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Environmental	Biodiversity, ecosystems and soil	(+) (−) (actual and potential)	6 CLEAN WATER AND SANITATION 14 LIFE BELOW WATER 15 LIFE ON LAND
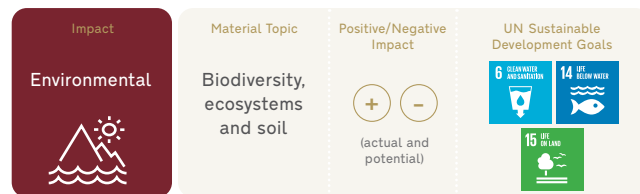
The protection, preservation and enhancement of biodiversity, ecosystems, and soil in the areas where it operates, constitutes a priority for the Group. In this direction, it certifies its products as organic, implements the "Sustainable Hotel Farming" Program, conducts relevant trainings, is certified with the "Costa Nostrum Sustainable Beaches" international standard for the protection of coastal and marine biodiversity near the beach of its hotels and implements corporate initiatives.

Organic Products Certification
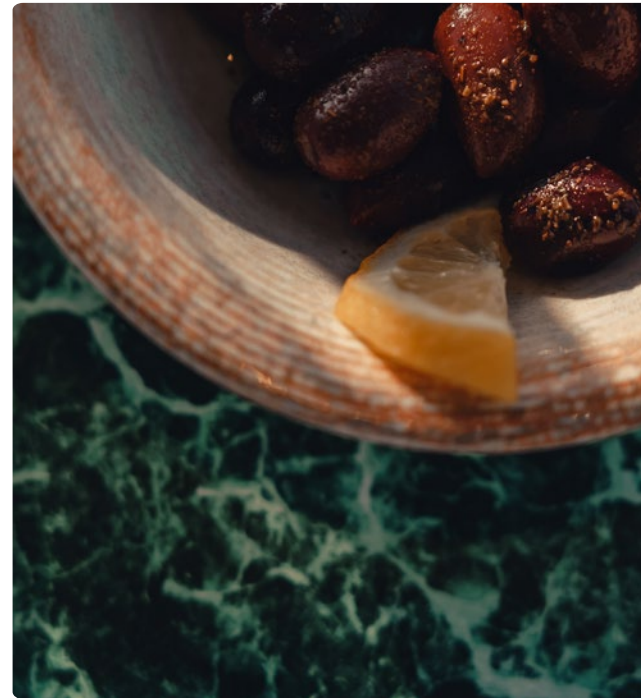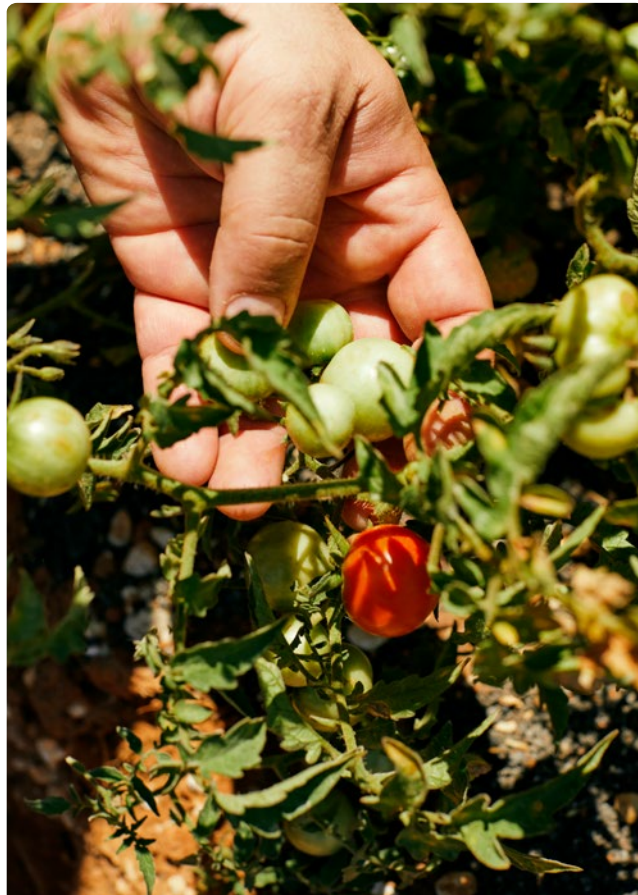● GRI 304-2

In 2011, the Group started the process of Certification of Organic Products for its hotels (areas of 58.07 acres) in accordance with the EU Regulation 2018/848 for organic agriculture, with the aim of having their areas certified as organic by 2024. The external audit required for obtaining the certification, was carried out by "DIONET – Organization for the Control and Certification of Organic Products" and is renewed annually.

The certification process consists of two stages, the "transitional" and the "organic". The transitional stage begins from the date of inclusion in the certification process and lasts 3 years. After the end of the 3 year period, the organic stage begins, during which everything produced from the lands of the Group's hotels is considered organic. The grounds of the Creta Maris Resort are already in the organic stage since 2014, except for the lawn areas which are expected to be certified as organic in 2025. The grounds concerning the hotels TUI Magic Life Candia Maris and Santo Mine Oia Suites have joined the certification process since 2021 and are expected to be certified by 2024.

This certification is exclusively linked to the Group's goal of coming one step closer to "green/regenerative hospitality", maximizing its contribution to the environment, as well as creating a regenerative, resilient, healthy, and environmentally friendly food system.

Sustainable Hotel Farming

In keeping pace with the principles of the European Green Deal and the EU "From Farm to Fork" Strategy, the Group aims to create a sustainable, healthy and environmentally friendly food system, and to maintain healthy soil, by avoiding the use of pesticides and herbicides, thus promoting organic cultivation in its gardens and the protection of biodiversity. In collaboration with the company Local Food Experts, the Group has developed and implements the "Sustainable Hotel Farming" Program, which contributes to the creation and maintenance of a sustainable ecosystem in the Group's operating areas.

The implementation of the Program continued for a 2nd consecutive year, and is based on the following pillars:

1 Issues related to energy and soil

The Group reduces its carbon footprint through greenhouse gas emissions reduction by avoiding the use of fertilizers and pesticides, and thereby allowing the soil's organic matter to function and sequester carbon.

2 Own food production

In the organic gardens of the Group's hotels, a multitude of organic herbs, organic fruits, and nuts, as well as vegetables, are grown using certified, sustainable production and cultivation methods. The cultivation of the gardens is directly linked to the hotels' restaurants and bars as, in this way, the Group combines the production of the raw material with responsible consumption and sustainable gastronomy. The consumption rate of organic products amounts to 2.36% of the total fresh vegetables consumed by the Group in total. Native plant varieties have been selected for cultivation, thus reducing the need for constant care, and implying a reduced need of water. The products are grown on a seasonal basis, so as to avoid human intervention and refrain from burdening nature to produce something outside its natural cycle. Varieties may be co-cultivatedsubject to favorable conditions, thus saving space, water, nutrients and fertilizer use.

3 Sustainable landscape management

The Group creates "man-made landscape", i.e., contributes to land management, based on:
1. Taking care of soil health (e.g., use of nutritional preparations, soil improvement products and soil protection products, organic fertilizers and earthworm composting).
2. Reduction of water use.
3. Zero use of synthetic pesticides or herbicides.
4. Implementation of zones of non-human intervention, letting nature act.
5. Organic cultivation and horticulture in the gardens of all the hotels.

4 Training & communication

The Group wishes to contribute to the formation of a new perception of hotel farming and its connection with the production and supply of food. For this purpose, it informs and educates its employees, existing and potential guests, as well as its partners and suppliers.

Metaxa Hospitality Group

Initiatives to protect biodiversity

● GRI 304-2

The Group contributes in practice to the protection and preservation of biodiversity, through initiatives, actions and educational programs, as presented in detail below:

As a rule, endemic species are used for the planting of the outdoor areas of the hotels, with a constant effort to increase the variety of species and the number of plants, while biological management of the hotel gardens is applied with the aim of preserving and increasing (expelling) the beneficial insects and the microorganisms endemic to the local ecosystem.

Continuous trainings are carried out for the gardening team (i.e., "green team") of each hotel, which concern sustainable land management practices and soil health. In these trainings, the results and continuous efforts of the Group for the environment are presented in detail, while guests and partners are invited to become part of the actions protecting the local flora and fauna.
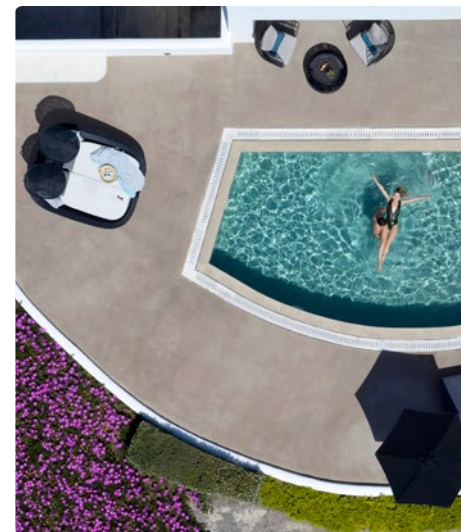
The Group takes care of its footprint on the local flora and fauna (insects, birds). Through the placement of planted rooftops on the roofs of the Group's hotels in Santorini, which hold the ground and the water at the same time, thus allowing for the water to drain and flow so that it does not stagnate, the plants are properly watered, and it does not create roof insulation issues.
In this way, the Group creates autonomous ecosystems in its new hotel units in Santorini, which act as a "green roof", making them friendlier to the local flora and fauna.

The Creta Maris Resort and TUI Magic Life Candia Maris in Crete have obtained the certification of the international standard "Costa Nostrum Sustainable Beaches", which is attributed to sustainable beaches. This fact practically proves the respect that the Group shows to biodiversity, as well as to the flora and fauna that lives and grows in the marine and coastal zone of the beaches of its hotels. In particular, for the protection of coastal and marine biodiversity, coastal cleaning actions are organized through volunteer groups, involving workers and guests.

4.3 Water resources

Management approach

● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Environmental	Water resources	+ − (actual and potential)	6 CLEAN WATER AND SANITATION 14 LIFE BELOW WATER

The Group implements initiatives for the proper management and protection of water as well as programs to measure and reduce its consumption. In particular, Creta Maris Resort implements water resource management procedures that are in line with ISO 14001. By 2025, TUI Magic Life Candia Maris and Santo Pure Oia Suites & Villas are also expected to be certified. Despite the actions that the Group implements, it does not cease to have large water consumption needs resulting from the daily operation of its hotels.

Withdrawal and use of water

● GRI 303-1 | GRI 303-2 | GRI 303-3 | ATHEX SS-E3

The consumption of water in the Group results mainly from its necessary use for the provision of its services:

Hospitality – Accommodation
- Personal water needs of guests in its total of 1,066 rooms, suites and villas.
- Cleaning of rooms and common areas (interior and exterior) of the Group's hotels..

Catering
- Use of water in restaurants, bars and snack points during the preparation of food and drink.
- Using water to clean food and drink utensils.
- Meeting the personal needs of guests.

Recreation
- Water use in facilities (e.g., jacuzzi, indoor and outdoor pools).
- Cleaning and maintenance of sports and recreation areas.

Conference organization
- Coverage of participants' water needs.
- Cleaning and maintenance of premises.

Wellness
- Cleaning and maintenance of gym areas.

The Group covers its needs by withdrawing water from groundwater (licensed boreholes), from sea water by withdrawing water from desalination plants at TUI Magic Life Candia Maris, as well as water from the municipal water supply network (Municipal Water and Sewerage Utilities – DEYA). The collection of water data has been carried out based on the recordings of the maintenance departments as well as the agronomists of the Group. The areas where the Group operates, with water reserves under increased stress have been identified through the Aqueduct Water Risk Atlas and have been identified as extremely high risk.

Water withdrawal and discharge (ML)

Water sources	2022		2021		2020	
	All areas	Water-Stress Areas	All areas	Water-Stress Areas	All areas	Water-Stress Areas
Surface water (ML)						
Fresh water (ML)	0	0	0	0	0	0
Other water (>1,000 mg/lt total of dissolved solids) (ML)	0	0	0	0	0	0
Groundwater (ML)						
Fresh water (m³)	0	305,662.65	0	266,216.64	0	158,409.07
Fresh water (ML)	0	305.66	0	266.22	0	158.41
Other water (>1,000 mg/lt total dissolved solids) (m³)	0	54,710	0	47,985	0	41,477
Other water (>1,000 mg/lt total of dissolved solids) (ML)	0	54.71	0	47.99	0	41.48
Seawater (ML)						
Fresh water (m³)	0	79,472.73	0	0	0	44,268.18
Fresh water (ML)	0	79.47	0	0	0	44.27
Other water (>1,000 mg/lt total of dissolved solids) (ML)	0	0	0	0	0	0
Produced water (ML)						
Fresh water (ML)	0	0	0	0	0	0
Other water (>1,000 mg/lt total of dissolved solids) (ML)	0	0	0	0	0	0
Third-party water (ML)						
Fresh water (m³)	0	20,031.92	0	29,330	0	2,977
Fresh water (ML)	0	20.03	0	29.33	0	2.98
Other water (>1,000 mg/lt total of dissolved solids) (ML)	0	0	0	0	0	0
Surface water (ML)	0	0	0	0	0	0
Groundwater (ML)	0	0	0	0	0	0
Seawater (ML)	0	0	0	0	0	0
Produced water (ML)	0	0	0	0	0	0
Total water withdrawal (ML)	0	459.88	0	343.54	0	247.13
Total water withdrawal (m³)	0	459,877	0	343,535	0	247,127
Fresh water (m³)	0	405,167	0	295,550	0	205,654
Fresh water (ML)	0	405.17	0	295.55	0	205.65
Other water (>1,000 mg/lt total of dissolved solids) (ML)	0	54.71	0	47.99	0	41.48
Total water discharge (ML)	0	172.83	0	118.35	0	95.75
Total water discharge (m³)	0	172,829	0	118,347	0	95,751
Fresh water (ML)	0	172.83	0	118.35	0	95.75
Fresh water (m³)	0	172,829	0	118,347	0	95,751
Other water (>1,000 mg/lt total dissolved solids) (ML)	0	0	0	0	0	0
Other water (>1,000 mg/lt total dissolved solids) (m³)	0	0	0	0	0	0

Metaxa Hospitality Group

Water resource management initiatives

● GRI 303-1 | ATHEX SS-E4

The Group implements in all its hotel units a variety of initiatives for the proper management of water resources but also to avoid risks related to water consumption. The Group follows the regulatory framework governing the legal provisions for hospitality service units regarding the management and quality of its water and wastewater, while implementing various programs and initiatives:

› Automatic and manual measurements to prevent leaks.

› Monitoring of water consumption on a monthly basis.

› Flow regulators in hotel taps to reduce consumption in rooms and other facilities.

› Improvement of water supply by regulating the flow from the main water switches at Creta Maris Resort.

› Automated watering during the evening hours.

› Water recycling and automatic water purification in swimming pools.

› Reverse osmosis and filtration units used by all Group hotels for better water filtration.

› Implementation of the "Wash on Demand" policy for cleaning service of hotel towels and sheets, which invites customers to contribute to reducing water consumption through special signs.

› Pool cleaning manually or using robotic pool cleaners, to avoid frequent replacement of fresh water.

› Training of the staff of all maintenance departments of the Group's hotels on water saving techniques.

› Licensed seawater intake for use within TUI Magic Life Candia Maris hotels.

› Reduction of lawn areas in hotel facilities, where available, to limit water use during their watering.

› The sources from which the Group withdraws water for its various needs come from licensed boreholes, desalination plants, or direct intake of water from the network depending on the location, through legal procedures or from the respective municipality.

› Provision made for the use of water from swimming pools, for irrigation or water supply purposes, in the two new units, Santo Mine Oia Suites and The Villas by Santo Collection, which are under construction in Santorini and are expected to operate within 2023.

› Training of suppliers through the "Sustainable Supplies" program on water resources management.

As shown in the table below, water consumption in 2022 increased compared to previous years. This is due to the increase in overnight stays per person and the addition of new facilities (e.g., creation of a jacuzzi, swimming pool) in all three hotels of the Group that were renovated.

● GRI 303-5 | ATHEX SS-E3

Total water consumption

	2022		2021		2020	
	All Areas	Water Stress Areas	All Areas	Water Stress Areas	All Areas	Water Stress Areas
Total water consumption (m^3)	0	287,048	0	225,185	0	151,380
Total water consumption (ML)	0	287.05	0	225.19	0	151.38

Water resources protection initiatives

● GRI 303-2

For the protection of water resources, the Group implements:
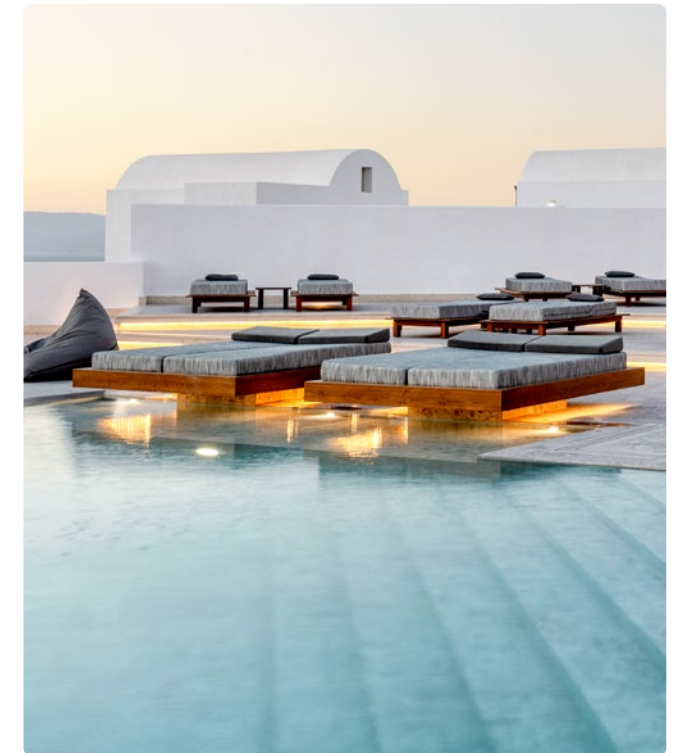
› Checking and maintenance of the quality of water, wherever it is used (for which the Group has been certified according to ISO:22000). A prerequisite for certification is the check of the quality of water use for hygiene reasons in all areas of hotels.

› Connection of the sewerage system of the Group's hotels with the local biological wastewater treatment, so that liquid waste is not discharged directly into the sea.

› Sustainable Hotel Farming Program, in which synthetic plant protection and nutrition preparations are not used, to avoid contamination of the soil and consequently the groundwater.

With an implementation horizon until 2027, the Group is in the process of drafting targets for the rational management and protection of water resources.

4.4 Waste and resource intensity

Management approach
● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Environmental	Waste and resource intensity	+ − (actual and potential)	3 GOOD HEALTH AND WELL-BEING / 6 CLEAN WATER AND SANITATION / 12 RESPONSIBLE CONSUMPTION AND PRODUCTION

The consumption and/or use of raw materials and materials from non-renewable sources for operational purposes, as well as the generated waste from hotels, create negative impacts on the environment. For this reason, the Group takes care of the management of waste produced by its hotels and restaurants: it records its waste in a detailed manner, reduces it to the maximum and applies composting and recycling practices.

Food waste
● GRI 306-1 | GRI 306-2

In 2022, the Creta Maris Resort continued its participation in WWF's "Hotel Kitchen: Here we value food" program. WWF Greece, with the support of Unilever Food Solutions, is implementing the program in 11 hotels, including Creta Maris Resort in Crete, which participated in it from May 2021 to September 2022. The program implemented the requirements of article 20 of Law 4819/2021 on recycling, according to which hotel units with more than 100 beds, are obliged to record and declare the quantity of food waste at their facilities from 01/01/2022.

In particular, through the program, Creta Maris Resort proceeded to:

› Measuring and recording daily the levels of food waste at selected points.

› Implementing prevention tactics (e.g., by creating portions rather than placing food at the buffet in large utensils, supervising restaurants/buffets to monitor food consumption) to avoid food waste during the preparation, presentation and serving of food.

› 15 staff trainings of the food and beverage, kitchen and service departments, on the issue of food waste and the importance of reducing it.

› Informing guests and employees about the effort in which the hotel participates, by placing relevant signs in public areas, restaurants, and guest and employee rooms.

During 2022, Creta Maris Resort measured weekly food waste from:

1. Food - vegetable preparation.
2. Buffet leftovers.
3. Guest's plate.
4. Staff's restaurant.
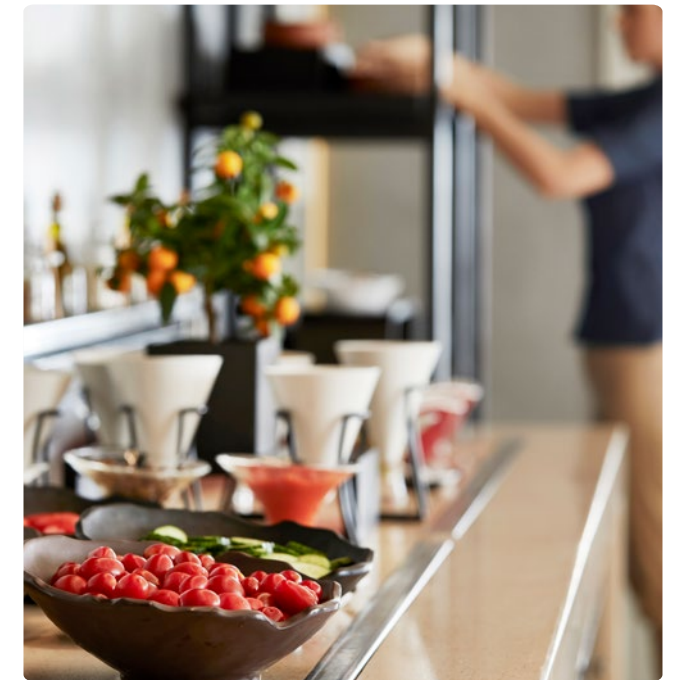
The measurement was achieved through the placement of bins at the above 4 points, the transfer of the waste collected to the scale area and their daily counting. This program is expected to be developed and implemented in the rest of the Group's hotels by 2026.

Organic waste

In support of the "Zero waste to landfill" target, Creta Maris Resort and TUI Magic life Candia Maris contributed to its achievement through the separation and management of 201 tons of organic waste from its kitchens and its restaurants, which would otherwise be destined for landfill. For 2022, waste from all hotel restaurants in Crete was transferred to the facilities of SYCHEM Group's Bioenergy Crete, where it was converted into biogas for power generation.

Implementation of a composting system

Organic kitchen waste (not containing oils) are transferred to our hotel gardens and, together with garden waste, are composted. Natural composting is an inexpensive and effective way of reducing organic kitchen waste (food leftovers, paper towels) and garden waste (clippings, grass). Through this process, a compost is produced from the decomposition of organic materials, which is of very good quality and that can be used for any type of cultivation.

In this context, the Group collaborates with Dandalis, the local coffee manufacturing company, from which it receives spent coffee waste to enrich the natural composting process and the creation of quality fertiliser for the hotels' gardens. In 2022, 3 tons of the Group's waste was composted.

Reducing the use of and recycling plastic

The Group, with a sense of responsibility, has taken significant actions to reduce and recycle plastic in its facilities. To this end, it has proceeded to:

▶ Replacing plastic with paper straws and cups.

▶ Replacement of single-use plastic products with wooden and paper ones, in the Group's restaurants and bars.

▶ Replacement of plastic bottles with glass or paper ones, in the Group's restaurants and bars.

▶ Replacement of single-use plastic bathroom products with refillable containers.

The Group collects plastics from all hotel departments, separates them in separate bins from all other waste, weighs them on special scales in the warehouse departments of each hotel and then forwards them to the recycling bin, from where they are collected by special recycling companies such as "Creta Eco Phoenix" and "Cretan recycling". In 2022, 8 tons of plastic were recycled.

Reduction of paper use

With regard to the reduction of paper use, the Group limits as much as possible the printed material providing information relating to each hotel (e.g. welcome card, room menus, notes page, envelopes, etc.) and instead forwards electronic information messages through an application installed on the TVs of the rooms, for their electronic display.

In addition, for the printing needs of the Group, environmentally friendly paper certified by the Forest Stewardship Council (FSC) is used. FSC is an independent, non-profit organization, founded in 1993 with the aim of promoting an environmentally appropriate, socially beneficial and economically sustainable management of our planet's forests. FSC certification provides the link between responsible forest management and the consumption of forest-derived products (timber, paper), allowing consumers to recognize responsible forestry products in stores around the world.

Waste recording

● GRI 306-3 | GRI 306-4 | GRI 306-5 | ATHEX A-E3

For the proper evaluation and implementation of waste management best practices, the Group recorded its non-hazardous waste in 2022. In addition, it recorded its waste management methods (e.g., reuse, recovery and landfilling) to assess and monitor its performance.

The calculation of the total weight of hazardous waste from all the Group's hotels could not be completed until the publication date of this Report, but its recording is expected to be completed before the next one is published.

The following data constitutes an inventory of the waste generated at Creta Maris Resort, TUI Magic life Candia Maris and Santo Pure Oia Suites & Villas. In the waste directed to disposal (e.g., landfill), the Santo Pure Oia Suites & Villas data has not been recorded.

The increase in the total weight of waste disposed of for recovery (e.g., recycling) in 2022, compared to previous years, is due to the fact that during the COVID-19 pandemic in 2020, based on health protocols, the resulting waste could not be recycled or reused. In addition, due to the pandemic, the summer season of 2020 was shorter and the waste generated was significantly less than in the next two years.

● GRI 306-3

Waste generated

Non-hazardous waste (t)	2022	2021	2020
Waste generated	536	677	265
Waste diverted from disposal	337	280	52
Waste directed to disposal	198	397	214

● GRI 306-4

Waste diverted from disposal

Non-hazardous waste (t)	2022			2021			2020		
	Onsite	Offsite	Total	Onsite	Offsite	Total	Onsite	Offsite	Total
Preparation for reuse	3*	201**	204	2	126	128	2	0	2
Recycling***	133	0	133	152	0	152	50	0	50
Total	136	201	337	154	126	280	52	0	52

* Waste sent for composting.

** Waste from the restaurants of the hotels Creta Maris Resort and TUI Magic life Candia Maris, transported to the facilities of Bioenergy Crete of the SYCHEM Group, where it was converted into biogas for power generation. In 2021 and 2020 the hotel TUI Magic life Candia Maris did not collaborate with Bioenergy Crete.

*** Includes waste of paper, glass, metal, plastic, cooking oils, electrical appliances, batteries, light bulbs.

● GRI 306-5

Waste directed to disposal

Non-hazardous waste (t)	2022			2021			2020		
	Onsite	Offsite	Total	Onsite	Offsite	Total	Onsite	Offsite	Total
Landfilling	0	198	198	0	397	397	0	214	214
Total	0	198	198	0	397	397	0	214	214

● ATHEX A-E3

Percentage of waste by type of treatment

Non-hazardous waste	2022	2021	2020
Total amount of waste (t)	536	677	265
Recycling	25%	22%	19%
Preparation for reuse	38%	19%	1%
Landfilling	37%	59%	80%

Metaxa Hospitality Group

5

CARING FOR PEOPLE AND THE LOCAL COMMUNITY

5. Caring for people and the local community

5.1 Employment practices & human rights

Management approach

● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Social	Employment practices & human rights	(+) (actual)	5 GENDER EQUALITY 8 DECENT WORK AND ECONOMIC GROWTH 10 REDUCED INEQUALITIES

The positive impact of the Group on employment lies in responsible employment practices, the provision of competitive salaries to employees, the utilization of human resources from the local communities where it operates, as well as the protection of human rights, the promotion of diversity and the assurance of equal opportunities for all.

We are our people

From the very first moment, the heart and mind of the Group were its people, the 804 employees who offer daily their smile, dedication and love in what they do. In this context, the Group has developed an organized and modern Human Resources Department giving priority to the recruitment of employees from the local communities where it operates (86% for 2022). During 2022, the Group collaborated with public and private schools of tourism professions, as well as universities, with the aim of bringing young people into contact with their future profession, gaining work experience and forming a good basis for a successful career in the tourism sector. In total, 35 students carried out their practical training in the various departments of the Group's hotels (food and beverage, customer services and central services departments).

The Group offers a wide range of career opportunities in the tourism industry, through the development of its activities in Crete and Santorini. To cover new jobs in the Group, priority is given to internal transfers as well as promotions/progressions of employees. The new jobs are initially announced to the Group's employees, who have the opportunity to submit their application and participate as a priority in the evaluation and selection process.

Employee data

● GRI 2-7 | GRI 2-30 | GRI 202-2 | GRI 401-1 | ATHEX ESG C-S4 | ATHEX ESG C-S7

The Group monitors and records its total employees by gender (women, men, other and not disclosed) on an annual basis, by type of contract (permanent or temporary employees), type of employment (full-time and part-time) and by hotel/area of activity. 100% of the Group's employees are covered by employment contracts. There are no workers who are not employees in the Group.

In the next table, the increase in total employees in 2022 compared to the previous two years is due to the need for more jobs in hotels due to the upgrade of the Group's services. Also in 2020, the tourist season was shorter (July-October) due to the regulations that emerged during the COVID-19 pandemic.

Employee by gender, type of work and location unit

	2022					2021					2020				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
MHG (headquarters)															
Total number of employees	50	23	0	0	73	38	18	0	0	56	30	16	0	0	46
Permanent employees	45	20	0	0	65	35	17	0	0	52	28	15	0	0	43
Temporary employees	5	3	0	0	8	3	1	0	0	4	2	1	0	0	3
Non-guaranteed hours employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of employees	50	23	0	0	73	38	18	0	0	56	30	16	0	0	46
Full-time employees	49	23	0	0	72	37	18	0	0	55	29	16	0	0	45
Part-time employees	1	0	0	0	1	1	0	0	0	1	1	0	0	0	1
CRETA MARIS RESORT															
Total number of employees	246	232	0	0	478	232	232	0	0	464	178	170	0	0	348
Permanent employees	3	25	0	0	28	0	21	0	0	21	0	18	0	0	18
Temporary employees	243	207	0	0	450	232	211	0	0	443	178	152	0	0	330
Non-guaranteed hours employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of employees	246	232	0	0	478	232	232	0	0	464	178	170	0	0	348
Employees	246	232	0	0	478	232	232	0	0	464	178	170	0	0	348
Full-time employees	245	232	0	0	477	231	231	0	0	462	178	170	0	0	348
Part-time employees	1	0	0	0	1	1	1	0	0	2	0	0	0	0	0
TUI MAGIC LIFE CANDIA MARIS															
Total number of employees	92	75	0	0	167	83	71	0	0	154	73	63	0	0	136
Permanent employees	0	8	0	0	8	0	8	0	0	8	0	5	0	0	5
Temporary employees	92	67	0	0	159	83	63	0	0	146	73	58	0	0	131
Non-guaranteed hours employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of employees	92	75	0	0	167	83	71	0	0	154	73	63	0	0	136
Full-time employees	92	75	0	0	167	83	71	0	0	154	73	63	0	0	136
Part-time employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SANTO PURE OIA SUITES & VILLASIS RESORT															
Total number of employees	41	45	0	0	86	34	39	0	0	73	34	32	0	0	66
Permanent employees	2	2	0	0	4	4	1	0	0	5	5	2	0	0	7
Temporary employees	39	43	0	0	82	30	38	0	0	68	29	30	0	0	59
Non-guaranteed hours employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of employees	41	45	0	0	86	34	39	0	0	73	34	32	0	0	66
Employees	41	45	0	0	86	34	39	0	0	73	34	32	0	0	66
Full-time employees	41	45	0	0	86	34	39	0	0	73	34	32	0	0	66
Part-time employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

● GRI 2-7 | GRI 202-2 | GRI 401-1 | ATHEX ESG C-S4 | ATHEX ESG C-S7

Total number of Group employees by type of employment for 2022
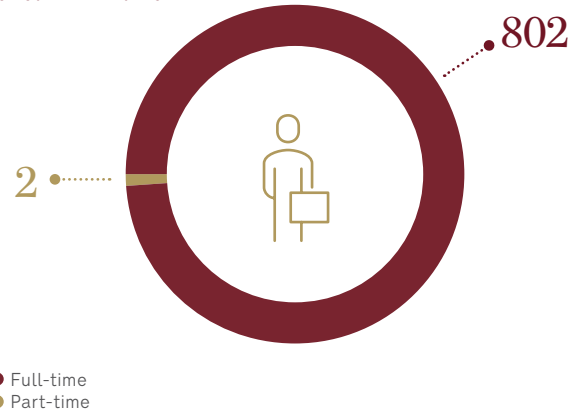
● 802
● 2

● Full-time
● Part-time

Total number of Group employees by type of employment for 2022

● 699
● 105

● Permanent
● Temporary
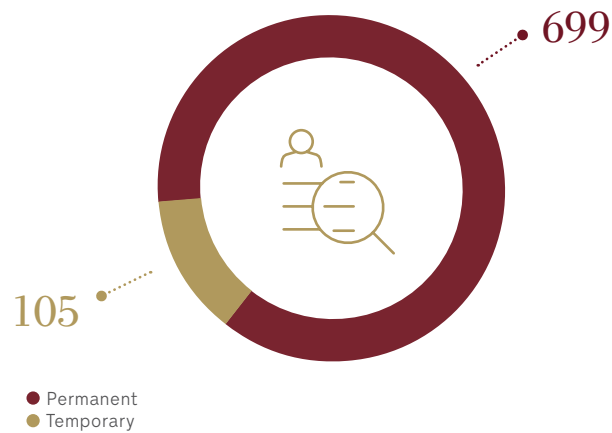
Employee by gender, type of work and location unit

	2022					2021					2020				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
TOTAL GROUP															
Total number of employees	429	375	0	0	804	387	360	0	0	747	315	281	0	0	596
Permanent employees	50	55	0	0	105	39	47	0	0	86	33	40	0	0	73
Temporary employees	379	320	0	0	699	348	313	0	0	661	282	241	0	0	523
Non-guaranteed hours employees	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total number of employees	429	375	0	0	804	387	360	0	0	747	315	281	0	0	596
Full-time employees	427	375	0	0	802	385	359	0	0	744	314	281	0	0	595
Part-time employees	2	0	0	0	2	2	1	0	0	3	1	0	0	0	1

● GRI 202-2

Percentage of senior management hired from the local community

2022	2021	2020
MHG (headquarters)		
100%	100%	100%
CRETA MARIS RESORT		
95%	94%	94%
TUI MAGIC LIFE CANDIA MARIS		
100%	100%	100%
SANTO PURE OIA SUITES & VILLAS		
100%	100%	100%

- Senior management, according to the Group's hierarchy, are all employees belonging to the "Manager" level and above.
- Significant locations of the Group are the areas where the three hotels are located and the location where its headquarters are located.

MESSAGE
2022 AT A GLANCE
1. THE GROUP
2. SUSTAINABLE HOSPITALITY
3. CORPORATE GOVERNANCE PRACTICES
4. ENVIRONMENT
5. PEOPLE & COMMUNITY
6. APPENDICES

The Group also records the total number of employee hires and turnover and monitors the hire and employee turnover rates (voluntary and non-voluntary).

● GRI 401-1 | ATHEX ESG C-S4

New employee hires and employee turnover

	2022														
	<30 years old					30-50 years old					>50 years old				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
MHG (headquarters)															
Number of new employee hires (#)	2	4	0	0	6	8	2	0	0	10	0	1	0	0	1
Rate of new employee hires	20%	50%	0%	0%	33%	24%	17%	0%	0%	22%	0%	33%	0%	0%	10%
Number of employee turnover (#)	0	1	0	0	1	5	2	0	0	7	0	1	0	0	1
Rate of employee turnover	0%	13%	0%	0%	6%	15%	17%	0%	0%	16%	0%	33%	0%	0%	10%
CRETA MARIS RESORT															
Number of new employee hires (#)	40	38	0	0	78	12	13	0	0	25	2	1	0	0	3
Rate of new employee hires	42%	44%	0%	0%	43%	13%	14%	0%	0%	14%	3%	2%	0%	0%	3%
Number of employee turnover (#)	18	15	0	0	33	12	7	0	0	19	1	1	0	0	2
Rate of employee turnover	19%	17%	0%	0%	18%	13%	7%	0%	0%	10%	2%	2%	0%	0%	2%
TUI MAGIC LIFE CANDIA MARIS															
Number of new employee hires (#)	7	6	0	0	13	8	6	0	0	14	5	0	0	0	5
Rate of new employee hires	44%	30%	0%	0%	36%	15%	15%	0%	0%	15%	24%	0%	0%	0%	14%
Number of employee turnover (#)	3	0	0	0	3	2	0	0	0	2	1	0	0	0	1
Rate of employee turnover	19%	0%	0%	0%	8%	4%	0%	0%	0%	2%	5%	0%	0%	0%	3%
SANTO PURE OIA SUITES & VILLAS															
Number of new employee hires (#)	14	11	0	0	25	5	6	0	0	11	3	0	0	0	3
Rate of new employee hires	78%	55%	0%	0%	66%	36%	29%	0%	0%	31%	33%	0%	0%	0%	23%
Number of employee turnover (#)	2	4	0	0	6	4	2	0	0	6	0	0	0	0	0
Rate of employee turnover	11%	20%	0%	0%	16%	29%	10%	0%	0%	17%	0%	0%	0%	0%	0%

Notes on the table:

• In the summer season 2022 there was a significant number of voluntary turnover, as the entire tourism industry was affected by the pandemic (the summer season of 2020 started in July and the summer season of 2021 in May, due to the restrictive measures).

• The increase in the rate of new employee hires at SANTO PURE OIA SUITES & Villas in 2022 compared to the previous two years, is due to the need for more jobs as a result of the upgrade of the Group's services at the hotel (creation of new rooms).

● GRI 401-1 | ATHEX ESG C-S4

New employee hires and employee turnover

| | 2021 | | | | | | | | | | | | | | |
| | <30 years old | | | | | 30-50 years old | | | | | >50 years old | | | | |
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
MHG (headquarters)															
Number of new employee hires (#)	5	2	0	0	7	2	1	0	0	3	0	0	0	0	0
Rate of new employee hires	56%	50%	0%	0%	54%	9%	8%	0%	0%	9%	0%	0%	0%	0%	0%
Number of employee turnover (#)	1	0	0	0	1	1	1	0	0	2	0	1	0	0	1
Rate of employee turnover	11%	0%	0%	0%	8%	5%	8%	0%	0%	6%	0%	50%	0%	0%	11%
CRETA MARIS RESORT															
Number of new employee hires (#)	47	58	0	0	105	27	11	0	0	38	4	9	0	0	13
Rate of new employee hires	59%	66%	0%	0%	63%	28%	12%	0%	0%	20%	7%	17%	0%	0%	12%
Number of employee turnover (#)	9	11	0	0	20	3	2	0	0	5	4	0	0	0	4
Rate of employee turnover	11%	13%	0%	0%	12%	3%	2%	0%	0%	3%	7%	0%	0%	0%	4%
TUI MAGIC LIFE CANDIA MARIS															
Number of new employee hires (#)	9	9	0	0	18	5	3	0	0	8	2	0	0	0	2
Rate of new employee hires	50%	41%	0%	0%	45%	10%	8%	0%	0%	9%	13%	0%	0%	0%	7%
Number of employee turnover (#)	1	1	0	0	2	1	0	0	0	1	0	0	0	0	0
Rate of employee turnover	6%	5%	0%	0%	5%	2%	0%	0%	0%	1%	0%	0%	0%	0%	0%
SANTO PURE OIA SUITES & VILLAS															
Number of new employee hires (#)	6	8	0	0	14	8	2	0	0	10	2	3	0	0	5
Rate of new employee hires	50%	44%	0%	0%	47%	50%	11%	0%	0%	29%	33%	100%	0%	0%	56%
Number of employee turnover (#)	1	1	0	0	2	4	2	0	0	6	2	0	0	0	2
Rate of employee turnover	8%	6%	0%	0%	7%	25%	11%	0%	0%	18%	33%	0%	0%	0%	22%

● GRI 401-1 | ATHEX ESG C-S4

New employee hires and employee turnover

	2020														
	<30 years old					30-50 years old					>50 years old				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
MHG (headquarters)															
Number of new employee hires (#)	0	1	0	0	1	0	2	0	0	2	0	0	0	0	0
Rate of new employee hires	0%	33%	0%	0%	14%	0%	18%	0%	0%	6%	0%	0%	0%	0%	0%
Number of employee turnover (#)	0	0	0	0	0	1	0	0	0	1	0	0	0	0	0
Rate of employee turnover	0%	0%	0%	0%	0%	5%	0%	0%	0%	3%	0%	0%	0%	0%	0%
CRETA MARIS RESORT															
Number of new employee hires (#)	5	4	0	0	9	4	7	0	0	11	1	1	0	0	2
Rate of new employee hires	10%	9%	0%	0%	0%	5%	8%	0%	0%	7%	2%	2%	0%	0%	2%
Number of employee turnover (#)	0	1	0	0	1	1	1	0	0	2	1	3	0	0	4
Rate of employee turnover	0%	2%	0%	0%	1%	1%	1%	0%	0%	1%	2%	7%	0%	0%	4%
TUI MAGIC LIFE CANDIA MARIS															
Number of new employee hires (#)	3	5	0	0	8	4	2	0	0	6	0	0	0	0	0
Rate of new employee hires	21%	31%	0%	0%	27%	9%	6%	0%	0%	7%	0%	0%	0%	0%	0%
Number of employee turnover (#)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Rate of employee turnover	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
SANTO PURE OIA SUITES & VILLAS															
Number of new employee hires (#)	9	9	0	0	18	3	7	0	0	10	0	0	0	0	0
Rate of new employee hires	47%	53%	0%	0%	50%	27%	47%	0%	0%	38%	0%	0%	0%	0%	0%
Number of employee turnover (#)	1	2	0	0	3	0	1	0	0	1	0	1	0	0	1
Rate of employee turnover	5%	12%	0%	0%	8%	0%	7%	0%	0%	4%	0%	0%	0%	0%	25%

Employee turnover rates

	2022	2021	2020
Involuntary turnover rate	0.5%	0.7%	0.03%
Voluntary turnover rate	9.9%	6.1%	1.7%

- In the 2022 summer season there were many voluntary turnovers as in the entire tourism industry affected by the pandemic (the 2020 summer season started in July and the 2021 summer season in May due to the restrictive measures).

Remuneration and benefits

● GRI 401-2 | GRI 401-3

The Group's people are key in providing the best authentic Greek hospitality services. The aim is to create conditions that ensure a healthy and stable working environment, thus establishing our Group as a highly preferred employer for its existing and future employees. In the Group, the reimbursement of remuneration and benefits follows the relevant national legal provisions. The Group's goal is to develop a Remuneration Policy by 2026.

The Group steadily invests, regardless of the type or duration of the contract, in the following voluntary benefits:

Benefits applicable to all hotels*

- Ticket to Crete/Santorini at the start of the tourist season.
- Departure ticket from Crete/Santorini at the end of the tourist season.
- New employee referral bonus (for those employees who propose new prospective employees).
- Season completion bonus (for those employees who will remain until the end of the season and will have completed at least 3 months of work).
- Discount for employees' friends/relatives who stay at the Group's hotels.
- Free access to training sessions both during the summer season and during the winter (for those who wish).
- Wedding and child allowance.
- "Employee of the Month" award to the best employee of the month.
- "Employee of the Year" award to the best employee of the year.
- Accommodation at staff houses.
- Provision of Meals at the staff restaurant.
- Provision of uniform depending on the job position.
- Transport to/from the hotel during the tourist season.

* Health care and life insurance, and disability insurance are not provided. There is no stock options plan as the Group is not listed on the Stock Exchange.

● GRI 401-3

Parental leave

	2022		2021		2020	
	Men	Women	Men	Women	Men	Women
Workers entitled to parental leave	3	2	2	2	1	2
Workers who took parental leave	3	2	2	2	1	2

Practices to enhance education

● GRI 404-1 | GRI 404-2 | ATHEX ESG C-S5 | ATHEX ESG A-S2

The Group's main care is that its people possess a high sense of hospitality and have high training and knowledge of the local market and the tourist product they are called upon to manage. To this end, the Group supports the work of its employees through continuous education and training, which constitutes a priority and is necessary, as it helps to improve employee loyalty, enhance employee retention, while increasing the efficiency and productivity of the Group as a whole.

Employees participate in training programs, following the recommendation of their supervisor according to the needs of the department and their interests. During 2022, the Group's employees enriched their existing knowledge and skills and developed new ones, through formal training programs aimed at increasing or enhancing technical skills and knowledge. The trainings included issues related to hotel safety, cleaning management, food & beverage, customer service, complaint and conflict management.

Recognizing that employees have a key role in achieving the Sustainable Development Goals, 70 trainings were conducted on 34 newly recruited employees in 2022. The trainings focused on sustainable land management practices and soil health, the use of local products and ingredients to protect local biodiversity and contribute to waste minimization.

The Group's goal for 2025 is to develop a unified training plan for the entire Group.

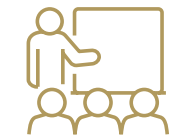**804**
employees
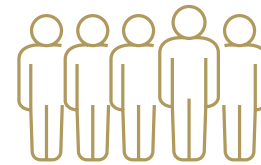
took part in the trainings

6,345
hours
of training

in seminar/conferences

Financing worth
€ 42,770
from the company to external bodies for training

● GRI 404-1 | ATHEX ESG C-S5

Average training hours per year per employee

	2022				2021				2020			
	Men	Women	Other	Not disclosed	Men	Women	Other	Not disclosed	Men	Women	Other	Not disclosed
Average training hours per year per employee	5.77	9.75	0	0	1.71	1.17	0	0	4.48	3.53	0	0
By employee level												
Employees in the top 10% of employees by total compensation*	11.08	21.95	0	0	4.31	4.73	0	0	8.42	0	0	
Employees in the bottom 90% of employees by total compensation	4.46	9.15	0	0	1.10	1.03	0	0	3.59	3.66	0	
By function												
Administrative staff	21.74	16.38	0	0	20.11	8.82	0	0	7.5	5.1	0	0
Services staff	4.72	8.88	0	0	0.74	0.34	0	0	4.30	3.37	0	0

* The reduction of the average training hours regarding employees in the 10% of employees by total compensation in 2021, is due to the fact that many seminars were canceled either due to restrictive measures or due to the illness of trainers. In addition, mass trainings (e.g., language courses) in which many employees participate were not planned for winter 2021 as it was not certain that they could take place

Performance evaluation

The Group encourages the continuous development of its employees, as this is a prerequisite for its success. The Human Resources Department seeks every employee to improve both individually and professionally. Performance evaluation takes place informally, on a daily basis, and systematically, at the end of each tourist season. The evaluation of personnel and supervisors aims to improve their performance, thus contributing to the achievement of corporate goals and the realization of the corporate vision. Employees and supervisors benefit as they learn their weaknesses and strengths in an objective way. In addition, performance evaluation is a useful tool that helps the Group identify further training needs of its members.

The Group conducts:

Performance evaluation	Every September, the process of Evaluations begins. Since 2021, the whole process has been digitized and is carried out through electronic questionnaires. Each employee is required to complete the Self-Assessment Document (different for Managers and Personnel). Each supervisor then completes the same document, but this time as an Employee Assessment. Finally, the Supervisor and the employee meet and discuss the results, to examine whether there are deviations, what are the objectives, training needs, achievements and possible career opportunities.

Research evaluation	One of the evaluation methods carried out in the Group is the evaluation of Managers by all its employees. Receiving collective feedback from members across the Group is a good way to assess how positive or negative their impact is. In 2022, the process was conducted online with the participation of 691 employees.

This evaluation has been taking place for the last 6 years through an anonymous questionnaire focusing on communication, decision making, leadership and general behavior of Executives. Evaluation strengthens employees' opinion and is a measurable and reliable tool for evaluating the management team. All evaluations are made every September-October to coincide with the end of each year's summer season, so as to set new goals for the next one. At the end of the questionnaire analysis, each Manager and his/her immediate supervisor receive a presentation of the results with a table for each question compared to the results of the previous season. The average result for each question and for each hotel is also collected, so as aquire a better picture in comparison to the previous year's results.

Protection of Human Rights

● GRI 2-23 | GRI 2-24 | GRI 405-1 | GRI 406-1 | ATHEX C-G5 | ATHEX C-S2 | ATHEX C-S3 | ATHEX C-S6 | ATHEX A-S3

Human rights are based on the principle of respect for the individual and are universal and indicate appropriate ways of behaving in the workplace. The Group implements the "Policy for the prevention and combating of violence and harassment at work", which aims to prevent violence and harassment of any form, including sexual harassment, of its employees, and the immediate and effective response to any incident. The Policy has been approved by the BoD.

The Policy applies to all employees, whether part-time, full-time or seasonal as well as to external partners of Metaxa Hospitality Group, regardless of their contractual status. Similarly, Metaxa Hospitality Group does not tolerate incidents of violence, harassment, or sexual harassment from external stakeholders. Customers, investors, and any other persons associated with the Group, such as trainees, interns, employees whose employment has ended, volunteers, candidate employees and individuals exercising employer powers, duties or responsibilities, are covered by the Policy.

The Policy contains the following pillars:

1 Policy for the prevention and combating of violence and harassment at work

| Violence | Harassment | Sexual Harassment |

The Group also implements the "Policy for the promotion of equality, anti-discrimination, inclusion and diversity at work", which has the same scope and is approved by the BoD. Equal opportunities, diversity and inclusion are promoted by the highest levels of the Group and relevant initiatives are implemented in its practices and policies for staff recruitment and selection, compensation and privileges, professional development and training, promotions, transfers, social and recreational programs, dismissals, terminations, and the continuous development of a working environment based on the principle of equality.

The Policy contains the following pillars:

2 Policy for the promotion of equality, anti-discrimination, inclusion and diversity at work

| Equal opportunities | Diversity | Inclusion |

The above Group Policies are based on all International Treaties, Regulations and EU Directives as incorporated into the Greek legislation. Currently, the Group's website is under construction and the relevant Policies intend to be posted on it by 2024. The Group's external stakeholders will be informed of the relevant Policies through the Group's website.

In this context, in 2022, training programs were provided to 118 newly recruited employees during their initial training, in relation to the above issues. The aim of the training is to help workers become aware of their own unconscious and conscious biases so as to be able to ensure that they do not manifest them at work.
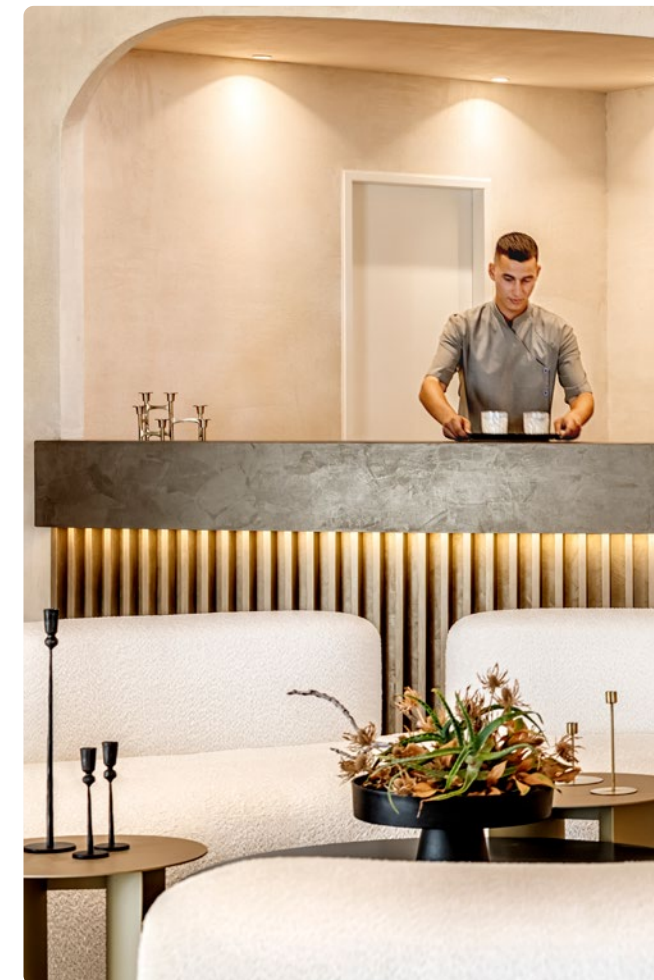
Incident reporting

Every employee should be vigilant and encouraged to report any unethical behavior. All directors, managers, employees and other persons bound by the above Policies are responsible for complying with them and reporting violations or alleged violations. The submission of reports is made either confidentially or anonymously and the employee is protected under the Personal Data Privacy Policy and the confidentiality of the Group's Human Resources Department.

To this end, the Group has a procedure for reporting and investigating incidents, which is mentioned in the above Policies and is communicated to its employees during their recruitment through a QR code.

Any violation may be reported directly in writing via email at HR@metaxahospitality.gr and orally to the Human Resources Department.

The complaint shall be substantiated, and appropriate action shall be taken within 7 days. Complaints shall be treated as confidential.

Depending on individual circumstances, the investigation may include:

- Disclosure of the nature of the complaint to the alleged offender.
- Inviting the alleged offender to provide a response.
- Interview all witnesses and obtain evidence related to the complaint.
- Review the findings of the investigation with the complainant and the offender and obtain any further clarifications.
- Discussion of the result the complainant would like to achieve.

Upon completion of the investigation, the investigator should immediately share their findings with the Group's Human Resources Department via email to HR@metaxahospitality.gr.

In 2022, there was 1 oral report of an incident of discrimination for which the Human Resources Department became aware, investigated and confirmed the complaint. Consequently, the Group terminated the employee's contract.

● GRI 405-1

Composition of governance bodies and analysis of employees by employee level and gender

2022														
	<30 years old					30-50 years old					>50 years old				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
By employee level															
BoD	0%	0%	0%	0%	0%	0%	100%	0%	0%	100%	75%	25%	0%	0%	100%
Senior Management	100%	0%	0%	0%	100%	32%	68%	0%	0%	100%	28%	72%	0%	0%	100%
Middle Management	0%	100%	0%	0%	100%	68%	32%	0%	0%	100%	50%	50%	0%	0%	100%
Employees	51%	49%	0%	0%	100%	55%	45%	0%	0%	100%	61%	39%	0%	0%	100%
By function															
Administrative staff	56%	44%	0%	0%	100%	73%	27%	0%	0%	100%	70%	30%	0%	0%	100%
Sevices staff	50%	50%	0%	0%	100%	51%	49%	0%	0%	100%	57%	43%	0%	0%	100%
2021															
	<30 years old					30-50 years old					>50 years old				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
By employee level															
BoD	0%	0%	0%	0%	0%	0%	100%	0%	0%	100%	75%	25%	0%	0%	100%
Senior Management	100%	0%	0%	0%	100%	35%	65%	0%	0%	100%	27%	73%	0%	0%	100%
Middle Management	0%	100%	0%	0%	100%	55%	45%	0%	0%	100%	67%	33%	0%	0%	100%
Employees	48%	52%	0%	0%	100%	55%	45%	0%	0%	100%	59%	41%	0%	0%	100%
By function															
Administrative staff	69%	31%	0%	0%	100%	65%	35%	0%	0%	100%	78%	22%	0%	0%	100%
Sevices staff	46%	54%	0%	0%	100%	52%	48%	0%	0%	100%	54%	46%	0%	0%	100%
2020															
	<30 years old					30-50 years old					>50 years old				
	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total	Women	Men	Other	Not disclosed	Total
By employee level															
BoD	0%	0%	0%	0%	0%	0%	100%	0%	0%	100%	75%	25%	0%	0%	100%
Senior Management	100%	0%	0%	0%	100%	33%	67%	0%	0%	100%	20%	80%	0%	0%	100%
Middle Management	33%	67%	0%	0%	100%	50%	50%	0%	0%	100%	100%	0%	0%	0%	100%
Employees	51%	49%	0%	0%	100%	54%	46%	0%	0%	100%	61%	39%	0%	0%	100%
By function															
Administrative staff	57%	43%	0%	0%	100%	65%	35%	0%	0%	100%	75%	25%	0%	0%	100%
Sevices staff	51%	49%	0%	0%	100%	50%	50%	0%	0%	100%	57%	43%	0%	0%	100%

● ATHEX C-S2 | ATHEX C-S3

Percentage of female employees

2022
- 68%
- 51%
- 55%
- 48%

2021
- 68%
- 50%
- 54%
- 47%

2020
- 65%
- 51%
- 54%
- 52%

- ● MHG (headquarters)
- ● CRETA MARIS RESORT
- ● TUI MAGIC LIFE CANDIA MARIS
- ● SANTO PURE OIA SUITES & VILLAS
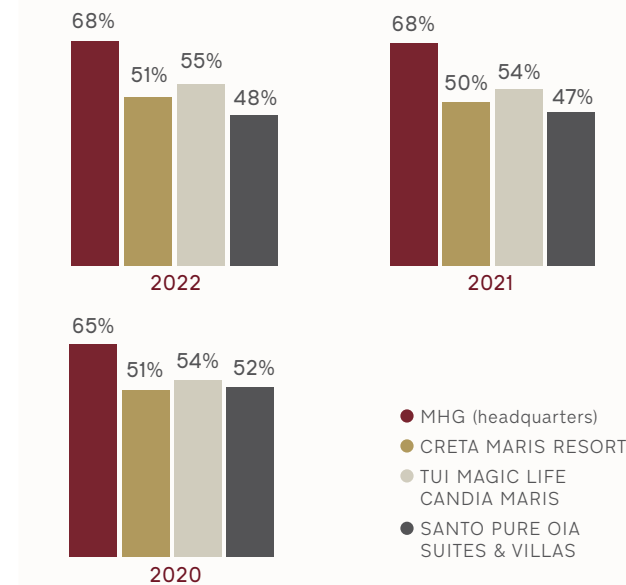
Percentage of female employees (total Group)
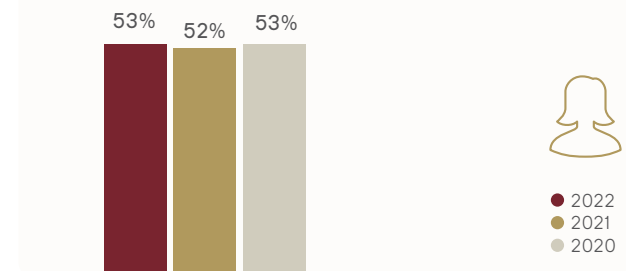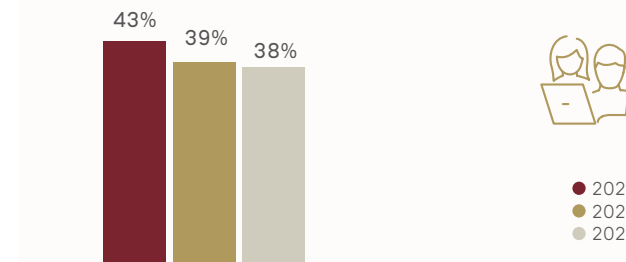
- 53% (2022)
- 52% (2021)
- 53% (2020)

- ● 2022
- ● 2021
- ● 2020

Percentage of female employees in management positions

- 43% (2022)
- 39% (2021)
- 38% (2020)

- ● 2022
- ● 2021
- ● 2020

5.2 Health and safety

Management approach

● GRI 3-3

Impact	Material Topic	Positive/Negative Impact	UN Sustainable Development Goals
Social	Health and safety	+ (actual and potential)	3 GOOD HEALTH AND WELL-BEING 8 DECENT WORK AND ECONOMIC GROWTH

The Group's health and safety is achieved through the implementation of the Health and Safety Management System "Committed to caring" in its hotels, the possession of the Health First "CoVid Shield" (TÜV AUSTRIA) certification by the Hellenic Chamber of Hotels, the ISO 22000:2018 certification, the Hazard analysis and critical control points (HACCP) certification as well as the provision of health and safety trainings.

Health and safety management system

● GRI 403-1 | GRI 403-8

The Group complies with the provisions of Labor Law that ensure a healthy and safe working environment. In particular, the Group applies the Greek legislation on operating licenses for hospitality facilities in relation to health and safety, as well as the national special health protocols based on the instructions of the official authorities regarding health & safety for each hotel area (e.g. swimming pool and beach areas, sports facilities, fire detection / fire safety, kitchen - LPG, current voltages - weak - low). The Group implements a Health and Safety Management System, named "Committed to Caring", which is in accordance with the above legal requirements, directives and regulations and applies to all employees and all hotels. By following all hygiene, food and safety rules, the Group's hotels receive HACCP certification every year and hold the ISO 22000 - Food Safety Management certification. In particular, Creta Maris Resort and Santo Pure Oia Suites & Villas, in 2022, received ISO 22000:2018 certification from TÜV Austria Hellas.

Through these certifications and ensuring compliance with their strict specifications, the safety and quality of food and beverages provided in the catering services of hotels is achieved.

In addition, during the COVID-19 period, the Group acquired the Health First certification, a health protocol for the operation of the departments/services offered by tourist accommodation, in accordance with the instructions of the NPHO and the Ministry of Tourism, as well as the Health First "CoVid Shield" (TÜV AUSTRIA). The certifications are valid in 2022. The Group's Occupational Health and Safety Management System is not certified by an external body in its entirety (all services, hotels and facilities). However, the Group plans to obtain the respective certification by 2027.

Workers covered by an occupational health and safety management system

	2022	2021	2020	
Number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by a health and safety management system [1]	804	747	596	
Number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by a health and safety management system	804	747	596	
	100%	100%	100%	Percentage
Number and percentage of all employees and workers who are not employees but whose work and/or workplace are controlled by the organization, who are covered by a health and safety system that has been internally audited	804	747	596	
	100%	100%	100%	Percentage
Number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by a health and safety system that has been audited by an external body [2].	0	0	0	
	0%	0%	0%	Percentage

[1] There are no workers who are not employees in the Group.

[2] The Group's facilities are not ISO 45001 certified.

Metaxa Hospitality Group

Minimization of risks

● GRI 403-2

To ensure health and safety and minimize risks, the Group takes care of the:

1	safety of facilities
2	compliance with strict standards
3	carrying out regular preventive security checks
4	continuous training of employees on safety issues
5	prevention and avoidance of any accidents through protective equipment
6	proper management of emergency situations that may jeopardise the health and safety of the staff

In addition, through HACCP certification, it is possible to predict hazards and their likelihood at every stage of the production process of a food, as well as to avoid causing damage to the customer's health. With the HACCP certification, it is ensured that the food departments of the Group's hotels ensure the hygiene of food and especially of the final product they offer to their guests and employees.

The Group provides its employees with the opportunity to express their concerns/reports in relation to occupational health and safety risks, either directly to their Manager and then to the Hotel Manager of each hotel, or to the Human Resources Department. In case Managers are unable to provide a solution, and depending on the nature of the problem, they may request the assistance of the Human Resources Department. The latter is responsible for managing any concern/report that may arise and carries out the necessary corrective actions. The Group's Privacy Policy ensures the protection of employees' privacy in case of filing such reports.

Incident investigation

●GRI 403-2 | GRI 403-7 | GRI 403-9 | GRI 403-10 | GRI 416-1 | ATHEX SS-S6

At the end of each summer season, the Incident rate for each unit/hotel as well as for the entire Group is calculated. Incident rates are an internal indicator used to compare the Group's Health and Safety performance against an average. This comparison is a benchmark for measuring Health and Safety performance relative to other companies in the same industry, as the average varies by business and industry.

In the event of an accident at work (either while the employee is en-route from the place of domicile to work or while returning from it), the employee must immediately contact his/her Manager who in turn must contact the Human Resources Department and the Hotel Manager. The safety technician is then informed, who, after compiling his report in relation to the accident, makes recommendations for the observance of safety rules and instructions in order to exercise due care. In addition, in the event of an accident, the first aid team (that consists of trained hotel staff) provides first aid and transports the employee to the nearest medical center or hospital.

●GRI 403-9 | GRI 403-10 | ATHEX SS-S6

Work-related injuries

Employees	2022	2021	2020
Number of hours worked	1,151,960	861,456	464,000
Number of fatalities as a result of work-related injury	0	0	0
Rate of fatalities as a result of work-related injury	0.0	0.0	0.0
Number of high consequence work-related injuries (excluding fatalities)	0	0	0
Rate of high-consequence work-related injuries (excluding fatalities)	0.0	0.0	0.0
Number of recordable work-related injury[1]	10	5	1
Rate of recordable work-related injuries (IR)[2]	1.7	1.2	0.4
Number of working days lost due to accidents at work	76	30	5
Accident severity rate	13.2	7.0	2.2

• The rates have been calculated at a rate of 200,000 ([total number of work-related injuries or number of working days lost due to work-related accidents/total number of working hours of all employees in the year] x 200,000). The rate of 200,000 indicates the number of hours worked by 100 full-time employees in a year.

• There are no workers who are not employees of the Group.

• There was no work-related ill health.

• For work-related injuries, the injuries recorded and reported to the Hellenic Labour Inspectorate were calculated.

• Work-related risks that may cause injuries have been identified and recorded by the safety technician.

[1] Refer to minor injuries. For 2021 and 2022, minor injuries resulting from equipment, machinery, slips, falls, falling objects are included.

[2] Accident severity rate based on terminology of the Athens Stock Exchange ESG Reporting Guide.

Health and safety services and benefits

● GRI 403-3 | GRI 403-6 | GRI 416-1

According to the provisions of Labor Law, the Group cooperates with the Occupational Physician and the Safety Technician, thus minimizing the likelihood of occupational accidents and the exposure of employees to risks related to their health. The occupational physician examines all employees every 2 years and keeps a record, for each one separately, on issues related to their health. Within the framework of his/her responsibilities, he/she is located within the hotels, during their period of operation, to be of service to guests, and delivers relevant first aid seminars to employees, that take place on an annual basis.

The safety technician inspects hotel facilities an average of 15 times a month to assess health and safety related impacts, monitor and introduce improvement measures to avoid occupational accidents that may occur. The regular inspections of the safety technician are carried out for all the Group's services (Hospitality, Accommodation, Catering, Recreation Conference Organization and Wellness). In addition, the Group maintains cooperation with external partners in all hotels to control food and water safety procedures, by carrying out sampling on a monthly basis. The Group provides gym services to its employees, at "manager" level and above, in all 3 of its hotels.

> The Group's goal until 2026 is to formulate a benefits program, which will offer services and programs related to health, safety and well-being -mental and physical- and will cover all employees in all the Group's hotels.

Health and Safety Training

● GRI 403-5

Maintaining a safe working environment is everyone's responsibility. Every employee must constantly attend the safety trainings and strictly adhere to the safety regulations.
The employee must observe the following general safety principles:

❯ Be well aware of the machinery and devices used, in order to avoid the risk of electric shock or accidents.

❯ Always use the required protective equipment.

❯ To make sure to turn off all electrical appliances when leaving his/her post and not to allow their use by unskilled people.

❯ Remove from the workplace any material that may cause an accident (broken glass, oil and water on the floor, etc.).

❯ Not throw cigarette butts and ashes in garbage bins.

❯ Not smoke in the workplace or in elevators.

❯ Follow the instructions and suggestions of his/her manager.

❯ Keep emergency exits unlocked.

The trainings are conducted per hotel department and include topics such as hygiene and safety within the hotel, fire safety, food hygiene, chemicals management, first aid by the safety technician as well as the occupational doctor, and COVID-19 (in collaboration with the University of Crete). In addition, for the safety of employees and visitors, hotels organize annual evacuation exercises, with different crisis scenarios each time, aiming at the preparedness and proper organization of each hotel's emergency management team.

In 2022, 1 evacuation exercise took place, at Creta Maris Resort under the guidance and supervision of the Professor of Dynamic Tectonic Applied Geology and Natural Disaster Management of the Department of Geology and Geoenvironment of the National and Kapodistrian University of Athens, the contribution of the Fire Brigade and the National Emergency Center, and the cooperation of the Municipality of Hersonissos.

5.3 Contribution to local communities

"We do local" initiative

Driven by the creation of resilient, sustainable and safe cities and communities, the Group implements the "We do local" Initiative. In the context of the Initiative, the Group for 2022 was active in the following pillars.

1 | Preference for local products and producers

With love and dedication to local communities, the Group contributes to the strengthening of the local economy of Crete and Santorini by supporting local traders and producers with the purchase of local products. The Group proudly, in 2022, collaborated with 51 local producers in Crete and Santorini and ensures that hotel guests come closer to the Greek gastronomy and the tradition of the place they have visited.
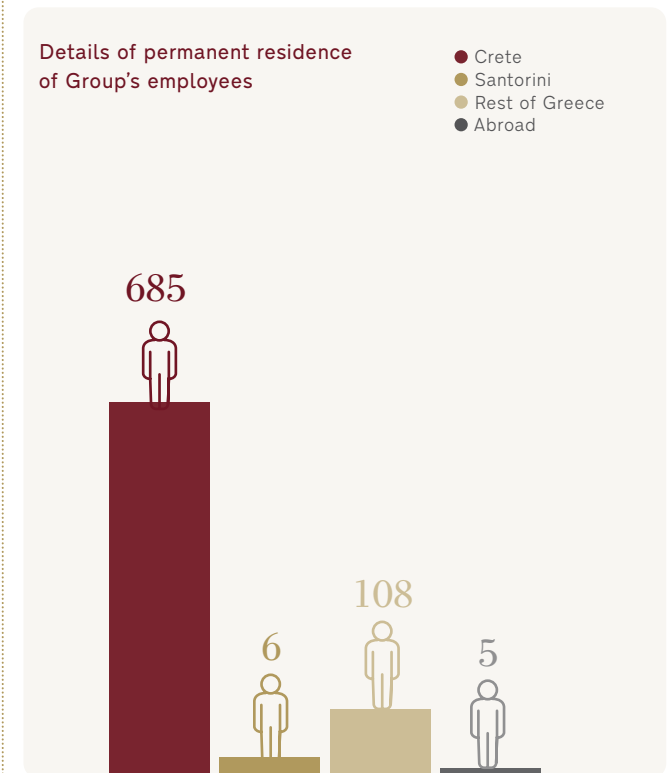
The preference for local products is the only way forward for the Group, as it ensures not only the contact of visitors with the local production of products, and therefore with the tradition of the location, but also contributes to the financial support of local communities and does not burden the environment with harmful gas emissions from international transport.

Percentages of purchases made by the hotels' food departments by place of origin/hotel for the year 2022
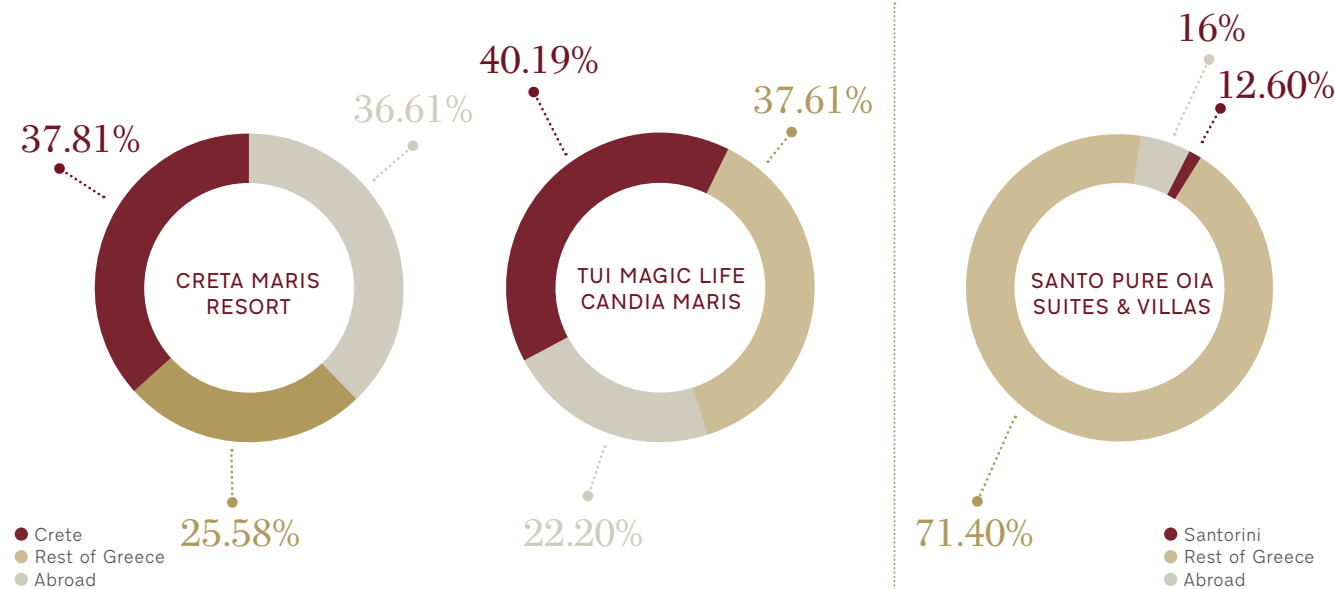
2 | Hires from the local community

During 2022, out of its 804 employees, it employed and trained 691 employees from Crete and Santorini (a percentage that amounts to 86% of the total employees), thus contributing to their professional training and lifelong learning.

Details of permanent residence of Group's employees

- Crete
- Santorini
- Rest of Greece
- Abroad

685

6

108

5

CRETA MARIS RESORT
37.81% — 36.61% — 25.58%
- Crete
- Rest of Greece
- Abroad

TUI MAGIC LIFE CANDIA MARIS
40.19% — 37.61% — 22.20%

SANTO PURE OIA SUITES & VILLAS
16% — 12.60% — 71.40%
- Santorini
- Rest of Greece
- Abroad

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3 · Volunteering & experiences actions for employees & guests

Setting People as the cornerstone of its philosophy, the Group stands by the local communities in which it operates, develops initiatives, and supports actions that promote social solidarity, culture, sports, volunteerism, education. For 2022, the amount of donations and sponsorships amounted to €21,000 and was granted to local cultural and sports organizations, as well as social structures in Crete and Santorini. In 2021, the Group began a strategic partnership with the Cultural and Conference Center of Heraklion, that continued in 2022. The performers were hosted at the Group's hotels in Crete, as a hospitality sponsorship, which amounted to €25,748.

During 2022, the Group actively participated in the following actions:

Volunteering & experiences actions or employees & guests

Creta Maris Resort					
Easter activities	Festive weekend in which visitors could get to know the local customs and traditions (dyeing eggs, kneading buns, decorating the epitaph, Good Friday liturgy and procession of the epitaph, Resurrection liturgy, roasting lamb and feasting at Easter). Services in the church were open to staff and guests outside the hotel.	Evacuation Exercise	Hotel evacuation exercise with the participation of staff, local authorities and the Kapodistrian University. In 2022, the preparedness exercise took on an even expanded role. It was included, as a subject of study, in the Applied Field Seminar CretaProtect: "Management of Environment, Risks and Crises in Island Environment", organized by the MSc "Environmental Disaster and Crisis Management Strategies" of the National and Kapodistrian University of Athens, in collaboration with the Municipality of Hersonissos and Creta Maris, with the participation of students of this MSc.	Greek Language Course	Weekly Greek Language Course.
Mother's Day	Viewing wishes in common areas and activities for children (card creation).			Beach cleaning	Organization of a symbolic beach cleaning starting from the beginning of the hotel's beach (under the pool villa) and finally at the square of Agia Paraskevi in Hersonissos.
Haircuts	Traditional sheep shearing at the hotel's organic farm.			Cooking class: Soutzoukia	Presentation of a traditional recipe of Soutzoukia (must with walnuts) by Mrs. Loula Metaxa.
Blood donation	Voluntary blood donation of staff.			Market	Weekly open market event with local producers.
Blue Flag	Blue Flag awarded to the hotel's beach. Voluntary beach cleaning with the participation of infants of the kindergarten "Zouzounakia".	Harvest	Traditional harvest in the hotel's vineyard. Then the grapes were transported with the hotel's donkey to the area where they were pressed by the customers. In the same area there was a small cauldron for distillation and moustalevria (local sweet).	Biodiversity Day	Organization of action for children. Walk around the organic farm and create handicrafts with herbs.
Tree Maintenance	Whitewashing of trees in the hotel gardens in order to protect them from insects. Volunteer staff members and guests participated in the action.			Ecological action	Beach cleaning for all visitors and then crafts with the plastics collected from the beach.
		Ocean Day	Organization of snorkeling activities for adults and building of sandcastles for children.	Celebration of World Tourism Day	Organization of festive activities: 1. Market, 2. Treat by the pool, 3. Photo banner at the main restaurant, 4. Cooking class, 5. Farmer for a day (for children), 6. Creation of postcards (for children), 7. Greek language course, 8. Greek Dances Show, 9. Promotion of festive activities of the municipality of Hersonissos.
Staff celebration	Celebration for the staff at the hotel's main restaurant at closing.	Cooking class	Weekly cooking class of local cuisine.		

Volunteering & experiences actions or employees & guests

TUI Magic Life Candia Maris

Easter activities	Good Friday liturgy and procession of the epitaph, Resurrection liturgy, roasting of lamb and feast at Easter. Services in the church were open to staff and guests outside the hotel.
Mother's Day	ffering flowers to all women in the main restaurant.
World Environment Day	Beach cleaning.
Cooking class	Weekly cooking class of local cuisine.
Greek Language Course	Weekly Greek Language Course.
Cocktail lesson	Weekly cocktail lesson using organic herbs from the hotel gardens.
Music nights	Organization of music nights 1 time per week.
Greek Music Action	Morning action with live Greek music.
Beach cleaning	Beach cleaning once a month.
Market	Weekly open market event with local producers.
Blue Flag	Blue Flag awarded to the hotel's beach. Voluntary beach cleaning.
Blood donation	Voluntary blood donation of staff.
World Car Free Day	Cycling event.
Oktoberfest	Celebration of local beer.
Celebration of World Tourism Day	Organization of festive activities: 1. Special menu for the day with organic ingredients at the restaurant Taverna, 2. treat at the pool, 3. Photo banner at the main restaurant.
Staff celebration	Party for staff on the hotel premises at closing.

Santo Pure Oia Suites & Villas

Easter activities	Offering dishes and candles to all guests and encouraging them to participate in local traditional events.
Blood donation	Voluntary blood donation of staff.
Vaitsis Exhibition	Organization of an exhibition of shadows by the artist Triantafyllos Vaitsis in a hotel area with free entrance from mid-August until the closing of the hotel at the end of October.
Music nights	Organization of music nights (harp, saxophone, piano, violin) at the hotel's main pool on a weekly basis (2-3 times per week). The area was also open to non-residents.
Celebration of World Tourism Day	Organization of festive activities: 1. Special tasting menu for the day at Alios Ilios, 2. Treat by the pool, . Cocktail masterclass at Akratos.
Staff celebration	Party for staff on the hotel premises at closing.

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M. Theodorakis Conference Centre	Naming ceremony of the Convention Center "Creta Convention Centre" to Mikis Theodorakis.

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For 2022, the Group's Donation/Sponsorship Program included the following:

Sponsorships - Donations

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Cultural Association of Kalo Chorio	Financial sponsorship to the Cultural Association of Kalo Chorio for the event 2nd Aposelemios run.	Crime Prevention and Suppression Team (CPST) of Heraklion	Donation of equipment to CPST Heraklion.
Santorini Experience	Providing hospitality to the organizers and athletes of the event (running and swimming).	Heraklion Cultural Conference Center	Provision of hospitality to the performers and artists of the events of the Heraklion Cultural Conference Center.
Holy Trinity Parish of Kavousi, Ierapetra	Financial sponsorship to the parish of Kavousi for the renovation of the Holy Trinity Church.	Cretan Association of Santorini "Arkadi"	Financial sponsorship to the Cretan Association of Santorini "Arkadi" for the organization of the cultural events of the Summer (2022).
Public Benefit Enterprise of the Municipality of Hersonissos	Provision of gift vouchers to the Public Benefit Enterprise of the Municipality of Hersonissosto be distributed to vulnerable groups through the action "Boxes of Love".	Cultural Association of Kavousi	Financial sponsorship to the Cultural Association of Kavousi for the organization of mountaineering games (Mikros Orinos Marathon) of Kavousi.
Cultural Association of Tzermiades "Anagennisi"	Financial sponsorship to the Cultural Association of Tzermiades for the event "Potato Festival".		
Association of Parents of Children with Neoplastic Diseases of Northern Greece "Lampsi"	Financial sponsorship to the Association of Parents of Children with Neoplastic Diseases "Lampsi".	Cities on volcanoes	Sponsorship dinner as part of the Cities on Volcanoes 11 conference.
Great Image	Financial sponsorship and hospitality to the artist Triantafyllos Vaitsis for the exhibition Art of Shadow (shadow sculptures) "Beyond the Visible" hosted at Santo Maris and Cultural Conference Center of Heraklion.	Athletics Club of Thira	Financial sponsorship to athletics club of Thira and more specifically to the women's volleyball team, for the year's season.

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6

APPENDICES

6. Appendices

6.1 About the Sustainable Development Report

●GRI 2-2 | GRI 2-3 | GRI 2-4 | GRI 2-5

This is the 4th, consecutive, Group's annual Sustainable Development Report, available in electronic form on its website www.metaxahospitality.gr. The Report presents information for the reference period 1 January 2022 to 31 December 2022. The financial statements of the Group cover the same period and the same entities - all 3 hotels of the Group. The date of publication of this Report is 10.11.2023.

The Report presents information regarding the Group's management approach and performance on Sustainable Development. In addition, the Report contributes to the formation of a basis for comparing the Group's performance in terms of Sustainable Development to previous years.

The Group's Sustainability Report has been prepared with reference to the new international Sustainable Development standards, the GRI Standards 2021 ("With reference to the GRI Standards"), and according to the updated Athens Stock Exchange ESG Reporting Guide (2022). At the same time, the Group continues to implement the 17 UN Sustainable Development Goals (SDGs). There are no restatements of information in the disclosures within the Report.

For the 2022 Sustainability Report, the Group has not proceeded with external content assurance. The Group has carried out an internal audit to ensure the content of the Report by the heads of the relevant hotel departments and subsequently by the Group's Chief Operating Officer (COO).

Communication

The Group considers that the opinion of each reader on the content of the Report is important for the development of dialogue. For this purpose, you can send your comments and/or any queries regarding the Report to the following contact details:

Address: 28A Alex.Papanastasiou Avenue, Heraklion Crete

Contact number: +30 2810 300520

Email address: info@metaxahospitality.gr

Coordinator: Marigianna Chalkiadaki, MHG Sustainability Manager

Departments/Directorates: MHG Sustainability Department

6.2 GRI Content Index

Statement of use	GRI 1 used
Metaxa Hospitality Group has reported the information cited in this GRI content index for the period 01/01/2022 – 31/12/2022 with reference to the GRI Standards.	GRI 1: Foundation 2021
	Applicable GRI sector standards
	N/A

GRI Standards	Disclosure		Page of the Report
	2-1	Organizational details	6 - 10
	2-2	Entities included in the organization's sustainability reporting	67
	2-3	Reporting period, frequency and contact point	67
	2-4	Restatements of information	67
	2-5	External assurance	67
	2-6	Activities, value chain and other business relationships	6 - 10, 13, 29 - 30
	2-7	Employees	47 - 48
	2-9	Governance structure and composition	24
	2-11	Chair of the highest governance body	24
	2-12	Role of the highest governance body in overseeing the management of impacts	17 - 20
	2-13	Delegation of responsibility for managing impacts	17 - 18
GRI 2 General Disclosures 2021	2-14	Role of the highest governance body in Sustainability reporting	20
	2-16	Communication of critical concerns	27
	2-17	Collective knowledge of the highest governance body	24
	2-21	Annual total compensation ratio	24
	2-22	Statement on Sustainable Development strategy	3
	2-23	Policy commitments	29 - 30, 55 - 56
	2-24	Embedding policy commitments	26 - 30
	2-25	Processes to remediate negative impacts	27
	2-26	Mechanisms for seeking advice and raising concerns	27
	2-27	Compliance with laws and regulations	26
	2-28	Membership associations	14 - 15
	2-29	Approach to stakeholder engagement	19
	2-30	Collective bargaining agreements	47

GRI Standards	Disclosure		Page of the Report
GRI 3 Material Topics 2021	3-1 Process to determine material topics		20 - 21
	3-2 List of material topics		20 - 22

Corporate governance practices - Business ethics

GRI Standards	Disclosure		Page of the Report
GRI 3 Material Topics 2021	3-3	Management of material topics	21 - 22, 26
GRI 205 Anti-corruption 2016	205-3	Confirmed incidents of corruption and actions taken	30
GRI 206 Anti-competitive Behavior 2016	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	30
GRI 418 Customer Privacy 2016	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	30

Our actions for an environmentally sustainable hospitality - Climate stability

GRI Standards	Disclosure		Page of the Report
GRI 3 Material Topics 2021	3-3	Management of material topics	32
GRI 302 Energy 2016	302-1	Energy consumption within the organization	32 - 34
GRI 305 Emissions 2016	305-1	Direct (Scope 1) GHG emissions	32, 34
	305-2	Energy indirect (Scope 2) GHG emissions	32, 34

Our actions for an environmentally sustainable hospitality - Biodiversity, ecosystems, and soil

GRI Standards	Disclosure		Page of the Report
GRI 3 Material Topics 2021	3-3	Management of material topics	35
GRI 304 Biodiversity 2016	304-2	Significant impacts of activities, products and services on biodiversity	36 - 38

Our actions for an environmentally sustainable hospitality - Water resources

GRI Standards	Disclosure		Page of the Report
GRI 3 Material Topics 2021	3-3	Management of material topics	39
GRI 303 Water and Effluents 2018	303-1	Interactions with water as a shared resource	39, 41
	303-2	Management of water discharge-related impacts	39, 41
	303-3	Water withdrawal	39 - 40
	303-4	Water discharge	40
	303-5	Water consumption	41

GRI Standards	Disclosure		Page of the Report
Our actions for an environmentally sustainable hospitality - Waste and resource intensity			
GRI 3 Material Topics 2021	3-3	Management of material topics	42
GRI 306 Waste 2020	306-2	Management of significant waste-related impacts	42 - 44
	306-3	Waste generated	44
	306-4	Waste diverted from disposal	44
	306-5	Waste directed to disposal	44
Caring for people and the local community - Employment practices & human rights			
GRI 3 Material Topics 2021	3-3	Management of material topics	46
GRI 202 Market Presence 2016	202-2	Proportion of senior management hired from the local community	47 - 48
GRI 401 Employment 2016	401-1	New employee hires and employee turnover	47 - 51
	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	52
	401-3	Parental leave	52
GRI 404 Training and Education 2016	404-1	Average hours of training per year per employee	53
	404-2 P	rograms for upgrading employee skills and transition assistance programs	53
GRI 405 Diversity and Equal Opportunity 2016	405-1	Diversity of governance bodies and employees	55 - 57
GRI 406 Non-discrimination 2016	406-1	Incidents of discrimination and corrective actions taken	55 - 57

GRI Standards	Disclosure		Page of the Report
Caring for people and the local community - Health and safety			
GRI 3 Material Topics 2021	3-3	Management of material topics	58
GRI 403 Occupational Health and Safety 2018	403-1	Occupational health and safety management system	58, 60
	403-2	Hazard identification, risk assessment, and incident investigation	59 - 60
	403-3	Occupational health services	61
	403-4	Worker participation, consultation, and communication on occupational health and safety	61
	403-5	Worker training on occupational health and safety	61
	403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	60
	403-8	Workers covered by an occupational health and safety management system	58
	403-9	Work-related injuries	60
	403-10	Work-related ill health	60
GRI 416 Customer Health and Safety 2016	416-1	Assessment of the health and safety impacts of product and service categories	60 - 61

6.3 Table of the Athens Stock Exchange ESG Reporting Guide 2022

ESG Classification	ID	Metric Title	Page of the Report	
Core Metrics				
Environment	C-E1	Scope 1 emissions	32, 34	It was not possible to collect data on the intensity of direct greenhouse gas (tnCO₂e) emissions in time for inclusion in this Report. It is expected that the recording will be completed by 2026.
	C-E2	Scope 2 emissions	32, 34	It was not possible to collect data on the intensity of indirect greenhouse gas (tnCO₂e) emissions in time for inclusion in this Report. It is expected that the recording will be completed by 2026.
	C-E3	Energy consumption and production	32 - 34	
Society	C-S1	Stakeholder engagement	19	
	C-S2	Female employees	55 - 57	
	C-S3	Female employees in management positions	55 - 57	
	C-S4	Employee turnover	47 - 51	
	C-S5	Human rights policy	53	
	C-S6	Human rights policy	55	The Group does not have a distinct Human Rights Policy. However, it has the "Policy to prevent and combat violence and harassment at work" and the "Policy for the promotion of equality, anti-discrimination, inclusion and diversity at work", which cover human rights.
	C-S7	Collective bargaining agreements	47 - 48	
	C-S8	Supplier assessment	29 - 30	

ESG Classification	ID	Metric Title	Page of the Report	
Corporate Governance	C-G1	Board composition	24	
	C-G2	Sustainability oversight	18	
	C-G3	Materiality	20 - 22	
	C-G4	Sustainability policy	18	The Group implements a Sustainable Development Strategy. However, it does not have a distinct Sustainable Development Policy but aims to form it with a time horizon of implementation in the next 2 years.
	C-G5	Business ethics policy	26, 55 - 56	
	C-G6	Data security policy	28	

Advanced Metrics				
Environment	A-E3	Waste management	44	
Society	A-S2	Employee training expenditure	53 - 54	
Corporate Governance	A-G1	Business model	11	
	A-G2	Business ethics violations	30	

Sector-specific Metrics				
Environment	SS-E3	Water consumption	39 - 41	No water recycling takes place. Therefore, the water recycling percentage has not been included (%).
	SS-E4	Water management	41	
Society	SS-S6	Health and safety performance	60	
	SS-S8	Customer satisfaction	19	
	SS-S9	Customer grievance mechanism	27	

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