

**ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG)
POLICY**

Contents	INTRODUCTION.....	3
2.	PURPOSE	3
3.	SCOPE OF APPLICATION	3
1. 4.	ROLES AND RESPONSIBILITIES	4
5.	MONITORING MECHANISM	4
6.	GOVERNANCE MODEL.....	5
7.	ENVIRONMENTAL MANAGEMENT	6
	7.1 HAZARDOUS AND NON-HAZARDOUS WASTE MANAGEMENT	6
	7.2 WATER MANAGEMENT	9
	7.3 ENERGY & GHG EMISSIONS MANAGEMENT INCLUDING CLIMATE CHANGE MITIGATION	10
	7.4 PROTECTION AND CONSERVATION OF BIODIVERSITY AND ECOSYSTEMS	12
	7.5 AIR POLLUTION & NOISE MITIGATION	13
8.	OCCUPATIONAL HEALTH & SAFETY ON THE WORKPLACE AND IN THE VALUE CHAIN	15
9.	WORKING CONDITIONS AND HUMAN RIGHTS PROTECTION	16
10.	LAND, PROPERTY AND LOCAL COMMUNITIES RIGHTS.....	17
11.	PRODUCT QUALITY AND CLIENT HEALTH & SAFETY	19
12.	BUSINESS ETHICS	19
13.	BUSINESS CONTINUITY	21
14.	COMMUNITY ENGAGEMENT AND SUPPORT	22
15.	POLICIES RELATED TO SUSTAINABLE DEVELOPMENT PRACTICES	22

1. Introduction

GEK TERNA Group (here after “the Group”) recognizes the need to address the environmental, social, and economic challenges facing the world today. As a responsible corporate entity, the Group is committed to integrating sustainable development principles into all aspects of our operations. Sustainable development is at the core of the Group’s business philosophy. By adopting sustainable practices, the Group aims to not only mitigate environmental risks but also create long-term value for all its stakeholders, including employees, clients, suppliers, and the wider community.

2. Purpose

This Sustainable Development Policy serves as a guiding framework to ensure that all the various operational activities are conducted in a manner that minimizes negative impacts on the environment, promotes social inclusivity, and contributes to the overall well-being of the communities in which the Group operates. This policy outlines the objectives and commitments in key areas of environmental stewardship, social responsibility, and economic viability. By embracing this Sustainable Development Policy, the Group reaffirms its commitment to responsible operational practices that prioritize the well-being of the planet, people, and prosperity, deciding factor for the establishment of the Company as preferred for its stakeholders. The principles and foundations outlined in this Policy are further developed and specified in the Group’s impact on its stakeholders. Additionally, specific policies addressing environmental, social, and corporate governance, as well as regulatory compliance, have been developed to meet the expectations of the Group's primary stakeholders.

3. Scope of Application

This Policy applies to the Group’s all full-time and part-time employees, interns, contractors, and subcontractors and all its subsidiaries. This Policy shall also apply, to the extent relevant, to the joint ventures, temporary joint ventures, and other equivalent associations, if the Company assumes the management thereof.

This sustainable development policy will cover the following impact factors:

- Environmental Management
- Hazardous and Non-Hazardous Waste Management
- Water Management
- Energy & GHG emissions management including Climate Change Mitigation
- Protection and Conservation of Biodiversity and Ecosystems

- Air pollution & Noise Mitigation
- Hazardous material management
- Occupational Health & Safety
- Human Rights Protection
- Product Quality and client Health & Safety
- Business continuity
- Community Engagement and Support

4. Roles and Responsibilities

- **Employees** and **management** must follow the guidelines mentioned below in order to successfully implement the policy.
- **Employees** should read the following policy, act in accordance with this policy and report any (possible) security breaches immediately.
- **Management** is responsible for communicating the following measures throughout the company and providing the means to support their implementation. Moreover, management considers all significant changes in the Group, legislation or the business environment and establishes measurable indicators and targets. It reviews the objectives, policy, and the achievement of these on an annual basis and additionally as and when required and deemed necessary to continuously improve the Group's performance.
- **Director of the Corporate Social Responsibility and Sustainable Development** coordinates with the involved departments & governance structures for the implementation and monitoring of the policy.

Name/Function: Danae Kalantidi/Director of Corporate Social Responsibility and Sustainable Development

Contact details: dkalantidi@gekterna.com

5. Monitoring mechanism

Policy review

Annual reviews and updates on the content of the policy, including changes in objectives, measures, and applicable regulations, will be conducted by the Director of the Sustainable Development and CSR Department. Therefore, the **Director** must communicate with all the relevant Departments and review and update the policy on an annual basis in order to respond to all requests and inquiries.

Approval of policy

The policy is approved by the CEO of the Group.

6. Governance Model

The governance model of the Group's ESG Committee, established in 2021 and consisting of five (5) members, focuses on the effective monitoring and evaluation of the Group's performance in environmental, social, and corporate governance matters. This model is based on specific principles and procedures that ensure the alignment of the Group's strategies with the principles of sustainability and social responsibility.

- **Composition and Expertise:** The committee consists of five members selected based on their expertise in ESG matters. The diverse knowledge and skills of the members allow a comprehensive approach to monitoring and managing ESG-related issues.
- **Continuous Evaluations:** The committee holds regular meetings to assess the Group's progress on environmental, social, and governance issues. These meetings enable the timely identification of problems and the implementation of corrective actions.
- **Integration of Non-Financial Factors:** A key part of the committee's work is the monitoring and integration of non-financial factors into business strategy and decision-making. This includes evaluating factors such as environmental impact, social impact, and the quality of corporate governance.
- **Strategic Resilience and Readiness:** The committee aims to strengthen the Group's resilience and preparedness in managing changes in its operating environment. This is achieved through the development of strategies that take into account trends and challenges in the field of sustainability.
- **Transparency and Accountability:** The ESG Committee's governance model incorporates principles of transparency and accountability, ensuring that the committee's decisions and actions are open to scrutiny by all stakeholders.
- **Through these procedures and principles, the governance model of the ESG Committee ensures that the Group's actions are consistent with the principles of sustainability and social responsibility, while also enhancing the Group's ability to respond effectively to the challenges and opportunities of the modern business environment.**

7. Environmental Management

Objectives

- **Aiming for 100%** of all business segments with ISO 14001:2015 certification
- **Above 70%** participation rate in environmental trainings provided to employees.
- **At least one** environmental inspection per project/facility.
- **Zero** incidents of non-compliance with environmental laws and regulations and relevant fines.

Measures

The protection of the environment and the reduction of the environmental footprint are an integral part of the Group's strategy and one of the central axes of its business activities. The Group aims to identify and deal with potential risks immediately, implementing the appropriate measures and integrating environmental issues into the Group's business models.

The Group conducts annual internal audits, in all its operational activities, in order to ensure compliance with the approved environmental conditions, as they apply per installation/operational activity, the special requirements that apply per case, as well as the requirements as defined in the procedures of internal systems and corresponding standards (ISO). Internal audits aim to achieve the following:

- Evaluation of the degree of compliance with the environmental legislation requirements.
- Evaluation of the degree of response to the requirements of the Group's customers
- Evaluation of the degree of compliance with the requirements of the Environmental and Energy Management Systems and ISO of the Group companies
- Identification of improvement areas

7.1 Hazardous and Non-Hazardous Waste Management

Objectives

- Responsible management of all hazardous and non-hazardous waste from all production activities, with emphasis on methods of rational collection, treatment, as well as reuse and recycling where feasible.
- Conducting regular inspections and audits to ensure compliance with the regulations on the storage, management and disposal of hazardous materials, with the aim of achieving **zero** deviations/violations on an annual basis.
- Provision of annual training programs for employees regarding the proper handling, storage and disposal of hazardous materials, in order to foster a culture of safety and awareness within the organization.

Measures

The Group as part of its sustainable construction practices, aims to implement effective waste management strategy. Indicatively, some of the key initiatives and measures undertaken on per project basis are the following:

- Waste assessment and management: Conduct a waste assessment to identify the types and quantities of waste generated during construction activities. Develop and or/apply waste management plans that outline strategies for waste reduction, recycling, and proper disposal.
- Source separation and recycling: Implement a system for source separation of different types of waste materials, such as concrete, wood, metal, plastics, and packaging. Set up designated areas or containers for each waste stream to facilitate recycling and ensure proper disposal.
- On-site waste segregation & waste collection points: Encourage workers to segregate waste materials at the source to minimize contamination and maximize recycling potential. Provide clear signage and training to ensure proper waste segregation practices are followed.
- Reuse and salvage: Promote the reuse and salvage of materials whenever possible. This can include salvaging materials from demolition or renovation projects for use in future construction, or donating usable materials to charitable organizations or community projects.
- Responsible disposal: For waste that cannot be recycled or salvaged, the Group liaises with external third-party licensed waste management companies to handle hazardous waste and other non-recyclable materials.
- Monitoring and reporting: Implement a system to track and monitor waste generation, recycling rates, and disposal methods. Regularly report on waste management performance to assess progress, identify areas for improvement, and demonstrate compliance with regulations.
- On a project basis, adapt modular construction practices to eliminate waste generation.
- Employee education and engagement: Provide training and education to employees on proper waste management practices. Raise awareness about the importance of waste reduction, recycling, and responsible disposal. Encourage employee participation and engagement in waste management initiatives.
- Continuous improvement: Regularly review and update waste management practices based on feedback, lessons learned, and emerging technologies. The Group strives to stay informed about new recycling options, waste reduction strategies, and regulatory changes to continuously improve waste management efforts.

Our Group's process optimization approach for hazardous materials management is described through the following measures:

- Identify and assess hazardous materials: Conduct a thorough inventory of all hazardous materials used or stored on construction sites. This includes chemicals, solvents, paints, asbestos-containing materials, and other potentially hazardous substances. Assess the risks associated with each material to prioritize management efforts.
- Develop responsible management plans that outline procedures for the safe handling, storage, transportation, and disposal of hazardous materials. These plans should include guidelines for labeling, personal protective equipment (PPE), spill response, and emergency procedures.
- Train and educate employees: Provide training to all employees on the proper handling and management of hazardous materials. This includes educating our employees and contractors on the risks associated with each material, safe handling techniques, and the use of appropriate PPE. Regularly update training programs to ensure compliance with regulations and best practices.
- Implement proper storage and labeling: Store hazardous materials in designated areas that are secure, well-ventilated, and equipped with appropriate containment measures. Clearly label all containers with the contents, hazards, and handling instructions to ensure proper identification and minimize the risk of accidents or misuse.
- Optimize material usage and substitution: Evaluate opportunities to reduce the use of hazardous materials by exploring alternative products or processes. Consider substituting hazardous materials with less harmful alternatives that achieve the same results. This can help minimize the quantity of hazardous materials on-site and reduce associated risks.
- Establish waste management procedures: Develop procedures for the proper disposal of hazardous waste generated during construction activities. Ensure compliance with local regulations and engage with licensed waste management companies for safe and responsible disposal. Implement waste segregation practices to facilitate recycling or proper treatment of hazardous waste.
- Regular inspections and audits: Conduct regular inspections of construction sites to ensure compliance with hazardous materials management procedures. Perform audits to assess the effectiveness of the management plan and identify areas for improvement. Address any non-compliance issues promptly and implement corrective actions.
- Continuous improvement and monitoring: Regularly review and update the responsible management plans based on lessons learned, new regulations, and emerging best practices. Monitor and track key performance indicators related to hazardous materials management to identify trends, measure progress, and drive continuous improvement.

Furthermore, the Group has currently in place a traceability system, as mentioned in the procedure for the control of substances hazardous to health (REACH), and implements

the following measures:

- **Inventory and categorize hazardous substances:** Conduct on a regular basis a comprehensive inventory of all hazardous substances used or stored on construction sites. Categorize them based on their properties, risks, and regulatory requirements. This includes chemicals, solvents, paints, asbestos-containing materials, and other hazardous substances.
- **Labeling and identification:** Ensure that all hazardous substances are properly labeled with clear and standardized labels. Labels include information such as substance name, hazards, handling instructions, and emergency contact details. Use consistent labeling formats and ensure labels are prominently displayed on containers.
- **Safety Data Sheets (SDS):** Obtain and maintain up-to-date SDS for all hazardous substances used. SDS provide detailed information about the properties, hazards, safe handling, and emergency response procedures for each substance. The SDS are easily accessible to workers and regularly reviewed for accuracy.

7.2 Water Management

Objectives

The Group has set the following targets on an annual basis:

- **Access for employees and citizens** of local communities to safe and drinkable water and sanitation facilities to meet their needs.
- **Aiming for zero** incidents of non-compliance with permits, standards and regulations on water quantity, availability or quality.
- **Aiming for discharge water quality data** measurements to be lower than the legally required limits on per project basis.

Measures

The Group implements continuous water management & improvement practices and monitoring programs in all its main operational units. More specifically, the Group applies the following measures in all the Group's business units:

- Regulatory compliance regarding water management is ensured by strictly following the Environmental Terms Approval Decisions and Water Use Permits of all industrial plants.
- Regular communication by the Company with the relevant authorities and regulatory bodies to identify and assess the future potential of regulatory changes relating to sustainability issues, including water.
- Setting of annual internal targets for water consumption.
- Environmental managers in each of the Group's BUs are assigned to monitor the objectives and responsible management of water resources in all construction/industrial plants.
- Implementation of an Environmental Management System certified by ISO 14001, through which potential incidents are managed and addressed, with the

development of plans to minimize the risk of leakage and the implementation of predictive, preventive and corrective measures to ensure the good condition of the water.

- Management of water discharges resulting from the Group's operational activity, in order to ensure that they are fully controlled, by monitoring parameters defined by the environmental regulations and conditions, according to which the environmental permits of the Group's Business Units' facilities have been obtained.
- Continuous improvement and enrichment of the Group's practices in this area is sought through voluntary participation in the global Water initiatives (such as CDP).
- Implementation of water recycling and reuse programmes on project basis, to the maximum extent possible, as well as rainwater harvesting and utilization practices.

For **responsible water discharge** on project basis, water discharges are monitored and controlled where applicable, in order to ensure the quality of the discharged water through parameters that are determined by the environmental regulations and conditions under which the environmental permits of the facilities have been obtained. In particular, the specifications and limits of the discharged water resulting from each activity are defined by the Environmental Terms Approval Decisions and Water Use Permits. Furthermore, measurements are carried out on a continuous basis to monitor the disposal quality of the treated industrial wastewater in terms of pH and temperature, and once a month analyses are carried out at the outlet of the treatment plant, which include temperature, suspended solids, total dissolved solids, COD, BOD5, pH, sulphur and fluoride. With regards to the characteristics of the marine receptor where the discharge takes place, its physico-chemical characteristics are monitored for compliance with the Environmental Quality Standards (EQS).

7.3 Energy & GHG emissions management including Climate Change Mitigation

Objectives

- Annual monitoring & reporting of GHG emissions for all the Group's subsidiaries.
- Aiming for implementation of specific action plans for the reduction of carbon footprint.
- 100 % of the Group subsidiaries to receive Guarantees of Origin (GOs) by 2030.
- High participation rate (**at least 70%**) of trainings on energy related issues to all employees.

Measures

The Group has established an environmental and energy management system characterized by clear objectives and measurable outcomes, with its progress assessed yearly. The Environmental and Energy Management System of the Group adheres to the

ISO 14001:2015 international standard, a certification held by the majority of its subsidiaries. Furthermore, the subsidiary TERNA has attained certification under the ISO 50001:2018 international standards, implementing an energy management system across all their projects and facilities. Additionally, the Group maintains certification in accordance with the ISO 9001:2015 international standard.

Moreover, regarding the GHG emissions reduction, the Group undertakes the following measures:

- Renewable energy sources: The Group obtains on an annual basis Guarantees of Origin (GOs) for most of the subsidiaries, with a future target to expand this practice to 100% of the Group subsidiaries by 2030.
- Employee engagement and training: All employees, company officials involved as well as contractors/subcontractors receive a mandatory training session on an annual basis on environmental and energy related issues. The main topics of the training process include the following:
 - Adopting the right approach to climate change issues.
 - Full updating on current legislation.

The content of the training program may be modified to address any legislative or other relevant changes. Furthermore, to increase employee awareness on sustainability issues, the annual sustainability report is available to all employees.

- Employee commuting & Business travel:
 - Implement telecommuting options: Explore the possibility of allowing employees to work remotely, at least part of the time. This can help reduce the need for daily commuting and subsequently lower energy consumption.
 - Promote cycling and walking: Encourage employees to cycle or walk to work. This promotes active commuting and reduces energy consumption associated with motorized transportation.
 - Encourage carpooling: Promote carpooling among employees for business purposes commuting (i.e. attending conferences/ or external meetings)
 - Promote teleconferences to avoid air travel emissions. When air travel cannot be avoided, we encourage economic class instead of business travel.
- Replacement of passenger vehicle fleet with electric/hybrid vehicles in order to reduce direct CO2 emissions.
- Upgrading of lighting and air conditioning equipment with more energy efficient solutions.
- Collaboration with suppliers and subcontractors: Encourage the Group's suppliers and subcontractors to adopt sustainable practices and provide environmentally friendly products and services.
- Use eco-friendly materials: The Group aims to opt for sustainable building materials such as recycled or reclaimed materials, low VOC (volatile organic

compound) paints, and sustainably sourced wood. This reduces the environmental impact associated with material extraction and manufacturing.

- Energy-efficient design: The Group tries to incorporate energy-efficient design principles into construction projects where feasible. This includes optimizing insulation, using energy-efficient windows, and incorporating natural lighting and ventilation to reduce the need for artificial lighting and HVAC systems.
- Green building certifications: The Group aims to obtain green building certifications for the infrastructure development projects such as LEED (Leadership in Energy and Environmental Design) or BREEAM (Building Research Establishment Environmental Assessment Method). These certifications validate the sustainability of construction practices and can enhance the company's reputation.
- Waste management and recycling: The Group develops comprehensive waste management plans on a project basis that include recycling and proper disposal of construction waste. This minimizes the amount of waste sent to landfills and promotes the reuse of materials.

7.4 Protection and Conservation of Biodiversity and Ecosystems

Objectives

- Aiming for zero incidents of biodiversity degradation.
- Annual monitoring of the risks and impacts on biodiversity in all environmentally licensed sites falling within Natura sites.
- Annual monitoring studies of bird fauna, where required depending on the geographical area of the projects.
- Technical protection systems to be installed where necessary (if applicable).

Measures

GEK TERNA Group is committed to managing the ecological impacts resulting from its activities. The protection of biodiversity and the restoration of the natural landscape of the exploitable areas associated with its business activities constitute a substantial challenge for the Group. The Group's approach of the biodiversity protection issue contributes to Sustainable Development in a broader sense, namely:

- conservation of mountain ecosystems, including biodiversity.
- restoration of exploitable land affected by its business activity.
- increase of afforestation and reforestation at local and national level.

Moreover, considering that plenty of Group's activities (e.g., wind farm development, infrastructure development, highway construction) take place within areas of high biodiversity value, the Group is responsible for implementing a management system that ensures the enhancement of the positive and the limitation of the negative effects that its operation creates or may create. The Group implements several measures in this direction:

- Application of certified systems.
- Conducting training for the workers and visitors of the construction sites regarding the protection of biodiversity.
- Undertaking initiatives to promote and protect local ecosystems.
- Use of mechanisms for monitoring and recording its effects on the wider natural environment.

Furthermore, during both the construction and operational phases of its projects, the Group conducts various environmental assessments and studies, including Environmental Impact Assessments (EIA), Special Ecological Assessment Studies (SEA), and Special Ornithological Studies (SOS), among others. These efforts are carried out in partnership with expert external third-party scientists and organizations. The fundamental goal of these initiatives is to gather and utilize critical data to safeguard local ecosystems by implementing effective measures for the protection and rehabilitation of the areas affected by its activities.

7.5 Air pollution & Noise Mitigation

Objectives

- Continuous and periodic sampling measurements of the pollutant emissions (NO_x, SO_x and particles).
- Monitoring and recording dust emissions in accordance with the environmental legislation and the Company's standards, where applicable.
- Annual training to all engaged employees and subcontractors on the importance of proper equipment maintenance and idle reduction practices to minimize unnecessary emissions.
- Regular noise monitoring and audits to assess the effectiveness of mitigation measures and identify opportunities for improvement.
- Scheduling of noisy construction activities during off-peak hours or weekends to minimize disruption to nearby residents and businesses.

Measures

More specifically, the following measures are to be implemented on a project basis:

- Dust control: Implement effective dust control measures to minimize the release of particulate matter into the air. This can include using water sprays, dust suppressants, and covering loose materials during transportation and storage.
- Emission control for construction equipment: Ensure that the equipment used on the construction site bears the CE marking, demonstrating that it complies with the essential health, safety and environmental requirements. Regularly service and tune equipment to reduce emissions and optimize fuel efficiency.
- Alternative fuel and electric equipment: Considers using alternative fuel options such as biodiesel or electric-powered equipment to reduce emissions from

construction activities. More specifically, this includes using electric vehicles, electric-powered machinery, or hybrid equipment.

- Construction site layout and traffic management: Plan the construction site layout to minimize vehicle movement and congestion, which can contribute to air pollution. More specifically, regarding the nature of the project, implement efficient traffic management strategies to reduce idling and unnecessary vehicle trips.
- Noise and vibration control: Implement measures to minimize noise and vibration from construction activities. Indicative illustrative measures include using noise barriers, acoustic enclosures, and vibration-damping techniques to reduce the impact on nearby communities and minimize the need for excessive equipment operation.
- Green procurement: Prioritize the use of low-emission and environmentally friendly materials during construction. This includes selecting construction materials with low VOC content and using eco-friendly adhesives, paints, and sealants.
- Monitoring and reporting: Implement air quality monitoring systems to assess the impact of construction activities on air pollution. Regularly monitor and report air quality data to ensure compliance with regulations and identify areas for improvement.
- Stakeholder engagement and communication: Engage with local communities, stakeholders, and regulatory authorities to communicate the company's commitment to air pollution control. Provide regular updates on air quality monitoring results and mitigation measures to build trust and transparency.

8. Occupational Health & Safety on the Workplace and in the value chain Objectives

Internal stakeholders

- **Aiming for zero fatalities**
- **100% of the Group's employees** receive training on H&S issues on an annual basis.
- **At least one** compliance audit on H&S issues per year, per project.
- Achieve **70%** of all operational plants with ISO 45001:2018 certification by 2030.

External stakeholders

- **Ensuring responsible and proper management of all construction sites**, with the aim of the continuous improvement of operating conditions and the minimization of impacts on society. **Appointment and training of a construction site manager in each active project**, with the aim of achieving **at least 90% compliance** with the procedures for responsible construction site management and the requirements for minimizing social and environmental impacts, as recorded in monthly inspections.
- **Reduction of risks for residents, visitors and the wider public**, through preventive safety measures, continuous surveillance and immediate response to potential hazards. **Training of 100% of external crews and construction site visitors** in basic safety procedures before entering project areas.
- **Maintenance of safe, protected and strictly controlled project areas**, by applying high safety standards, clear procedures and systematic monitoring. **Installation and operation of access control systems in 100% of active construction sites**, with recording of all entries/exits.

Measures

The health and safety of employees constitute fundamental aspects of GEK TERNA Group's operations and are primary business objectives. As a responsible organization, the Group acknowledges its duty to continuously enhance health and safety conditions within its work areas. Moreover, it respects the right of its employees, as well as those of independent contractors working on its premises, to carry out their duties without being exposed to risks that may lead to injury or occupational disease.

Equipment safety inspections is an ongoing process within the Group to ensure the continued safety of workers and compliance with regulations. More specifically, the Group implements the following steps to frequently conduct equipment safety inspections:

- Create and keep a list of all the equipment used on the construction site, including heavy machinery, power tools, scaffolding, ladders, and personal protective equipment (PPE).
- Determine how often each piece of equipment should be inspected. This can vary

depending on the type of equipment and the manufacturer's recommendations. Regular inspections are typically conducted daily, weekly, monthly, or annually.

- Create a comprehensive checklist that covers all the critical safety aspects of each equipment. The checklist should include items such as structural integrity, electrical components, moving parts, safety guards, brakes, tires, fluid levels, and any specific safety features.
- Train/ educate workers/inspectors: Ensure that the individuals responsible for conducting the inspections are properly trained and knowledgeable about the equipment being inspected and are familiar with the manufacturer's guidelines and any relevant safety regulations.
- Perform the inspections according to the established frequency. The assigned inspectors should thoroughly examine each piece of equipment, following the checklist and paying attention to any signs of wear and tear, damage, or malfunction.
- Record the results of each inspection, noting any issues or deficiencies identified. This documentation is essential for tracking maintenance and repair needs, as well as for compliance purposes. If any safety concerns or deficiencies are found during the inspection, take immediate action to address them. This may involve repairing or replacing faulty equipment, scheduling maintenance, or providing additional training to workers.
- Maintain records of all inspections, including dates, findings, and actions taken. This documentation will help demonstrate compliance with safety regulations and can be useful for future reference.
- Regularly review the inspection process and make improvements as necessary. This may involve updating the checklist, providing additional training, or implementing new safety measures.

9. Working conditions and human rights protection

Objectives

- **Aiming for zero** incidents of Human Rights Violations
- **100%** of the Group's employees receive training on Human Rights issues.
- **Coverage of 100%** of the Group's employees by collective bargaining agreements, in accordance with the applicable institutional and regulatory framework.

Measures

The Group aims to ensure labour relations that promote mutual trust, constructive cooperation, two-way communication and recognition, as stated in the Company's Human Rights Policy. At the same time, it aims to promote the fundamental principles

of the International Labour Organisation's (ILO) Declaration on the Protection of Fundamental Labour Rights, including:

- respect for freedom of association and effective recognition of the right to collective bargaining,
- the elimination of all forms of forced or compulsory labour,
- non-participation in forms of child labour, and
- the elimination of discrimination at work.

GEK TERNA Group recognizes that its activities may have direct or indirect impacts on the human rights of external stakeholders, including local communities, suppliers, subcontractors and other partners.

In this context, the Group is committed to respecting and promoting internationally recognized human rights, preventing instances of violations and encouraging responsible business conduct throughout the supply chain. This approach includes the integration of relevant requirements into contractual relationships, as well as the possibility of reporting and managing related issues concerning external stakeholders.

Child and Forced labour

The Group prohibits, will not participate in and will not support any form of forced or compulsory labour, prisoner labour or slave labour. The Group aims to raise awareness on the topic of child and forced labour by training all the Group's employees by 2027.

10. Land, Property and Local Communities Rights

Objectives

- 100% completion of legal and technical land ownership due diligence before the commencement of any contracting activity.
- Zero incidents of violation of cultural or archaeological elements per year through cooperation with competent authorities and the use of archaeological supervision where required.
- Creation and operation of a grievance mechanism in 100% of construction sites with monthly reporting of indicators.
- 100% completion of compensations before the commencement of works in a specific intervention area, where feasible.
- Installation and operation of watering or anti-dust systems in 100% of construction sites where there is airborne dust from earthworks.

Measures

The Group is committed to operating with full respect for local communities and the rights related to land, property and their cultural identity. In this context the Group:

- Respects land ownership, customary land use rights and cultural heritage. The Company recognizes the importance of formal and traditional rights associated with land and is committed to protecting any form of cultural or historical element that may be affected by its construction activities.
- Conducts fair, transparent and meaningful consultations with local communities. Continuous and open communication with residents, bodies and stakeholders is encouraged, in order to ensure that their views, needs and concerns are taken into account at all stages of the project.
- Avoids any involuntary resettlement or, where this is not possible, ensures fair and adequate compensation. The Group is committed to selecting solutions that prevent the displacement of individuals or households. In exceptional cases where this cannot be avoided, procedures of fair compensation and adequate support are implemented, in compliance with applicable laws and international principles.
- Reduces project impacts such as noise, dust, traffic burden and other disturbances. Preventive and control measures are adopted in order to reduce the nuisance caused to local communities, with an emphasis on environmental practices, safe traffic flow and effective management of dust and noise.

11. Product quality and client Health & safety

Objectives

- **Regular safety audits or inspections** of projects during construction and delivery phase to ensure compliance with safety standards, aiming for zero major safety violations.

Measures

GEK TERNA places the utmost importance on the health and safety of its customers, ensuring its operations align with the legal and safety precautions. Recognized for its industrial leadership in the market, the Group diligently ensures that all its projects meet stringent safety standards, from design to implementation. Each infrastructure built by the Group is accompanied by the latest in technology software system to enable the management of the building's emergency procedures and compliance practices. Moreover, the Group uses sustainable and non-toxic building materials to a large percentage and fully complies with national safety policies.

At the completion and delivery of every project, the Group provides the customer/end user with the relevant Operational and Maintenance manual, alongside the mandatory Health and Safety manual, associated with the proper maintenance and end use of the building/infrastructure.

To add on, the Group offers proactive awareness/ educational programs to their customers for their safety precautions when in and around the building. Moreover, GEK TERNA Group actively encourages feedback, establishing a direct line for health or safety concerns, which it addresses with promptness and efficiency.

12. Business Ethics

Objectives

- **100% of the Group's employees** are trained on Regulatory Compliance, the Code of Ethics and Business Conduct, and Policies.
- Maintenance of **zero confirmed incidents** of corruption, bribery or fraud across all of the Group's activities.
- Maintenance of a **strong culture of integrity and compliance** with the regulatory framework at all levels of the Group.

Measures

GEK TERNA Group is committed to ensuring a business environment that promotes transparency, accountability and responsibility. The Group promotes fair practices, compliance with the applicable regulatory framework and zero tolerance for phenomena of corruption or bribery, while the Code of Conduct serves as a reference point for the behaviour of all cooperating parties. Specifically, measures are

implemented that include:

- adoption and implementation of rules of ethics and conduct governing the behaviour of the Group's employees, Management and partners,
- compliance with the applicable legislation and regulatory requirements and alignment with the guidelines of the United Nations and the European Union,
- combating corruption and bribery,
- management and prevention of conflicts of interest through transparent procedures,
- ensuring transparency and integrity in transactions and decision-making processes,
- establishment of a mechanism for reporting issues or practices that conflict with the Code of Conduct, ensuring confidentiality and protection from retaliation for those who make reports,
- communication, awareness and training of employees on business ethics, conduct and regulatory compliance issues,
- internal audits in Divisions and construction sites on ethics issues,
- maintenance of ISO 9001 (Quality Management System), ISO 37001 (Anti-Bribery Management Systems) and ISO 37301 (Compliance Management Systems).

13. Business continuity

Objectives

- Develop **emergency preparedness and response plans** on per project basis to minimize disruption of the Group's operations, ensure resilience, safeguard the involved stakeholders and comply with Legal and Regulatory Requirements.
- Aiming for the conduction of at **least one** emergency exercise undertaken per project facility on an annual basis.

Measures

The Group, towards business resilience and continuity, develops and implements emergency preparedness and response plans on a project basis and specifically include the following:

- **Potential hazards/risks & impacts identification:** A thorough assessment per each construction site is conducted to identify potential environmental & H&S hazards/risks/impacts such as fires, natural disasters, chemical spills, accidents, and other emergencies specific to your industry.
- **Customer Orientation:** An orientation session is conducted for customers before they enter the construction site to provide them with an overview of the emergency procedures, including evacuation routes, assembly points, and communication channels.
- **Site Access and Security:** Clearly marked and secured customer access areas, ensuring they are easily identifiable and separate from construction zones. Measures are also implemented to control access and prevent customers from entering hazardous areas.
- **Communication Channels:** Clear instructions are provided on how clients can report emergencies or safety concerns and how they will receive updates and instructions during an incident and thus establish effective communication channels during emergencies.
- **Client Responsibilities:** The responsibilities of clients during emergencies are clearly defined, such as following instructions from construction personnel, evacuating promptly, and not interfering with emergency response efforts.
- **Personal Protective Equipment (PPE):** The PPE requirements for clients are specified, such as hard hats, safety glasses, high-visibility vests, and any other necessary protective gear, alongside with provided instructions on how to properly use and wear the PPE.
- **Emergency Assembly Points:** Designated assembly points are identified and communicated where customers should gather during evacuations. These points are to be located at a safe distance from the construction site and easily accessible.
- **Evacuation Procedures:** Step-by-step instructions are provided on how customers should evacuate the construction site during emergencies. Additional

Information is also included on primary and secondary evacuation routes, any obstacles to avoid, and the location of emergency exits.

- **Emergency Services Contact Information:** Emergency contact information is clearly displayed, including local emergency services, on-site emergency response team, and any other relevant contacts for customers to be aware of these and how to use them.

14. Community Engagement and Support

Objectives

- **Maintain above 2%** of annual EBITDA on spending towards social contribution activities.
- Annual increase of emergency relief actions.

Measures

The Group continuously strengthens its relations with the local communities in its areas of operation with through new actions and projects to maximize the added value it produces and its positive impact. In particular, GEK TERNA Group implements a social support program that reflects the Group's commitment to the principles of Sustainable Development in order to strengthen its business activities, meet the needs of its stakeholders and defend the well-being of local communities. Through targeted actions and initiatives, GEK TERNA Group improves the daily life of local communities, supports the younger generation, contributes to the care of socially vulnerable groups, and strengthens the local economy and entrepreneurship, while consistently standing ready to address crises and urgent needs.

The social contribution actions implemented by the Group shall positively impact the following areas:

- Healthcare
- Education
- Environment
- Culture
- Emergency response situations

15. Policies related to sustainable development practices

All employees of GEK TERNA Group are required to follow policies, report any issues or breaches, and play an active role in upholding a positive work environment.

Other related policies:

- Health & Safety and Environmental Policy

- Sustainable Procurement Policy
- Human Rights Policy