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SUSTAINABILITY REPORT

**AEGEAN  
MOTORWAY**



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# AEGEAN MOTORWAY

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# THE YEAR AT

## January 2024

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Horizontal wage increase adjusted to inflation

## February 2024

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Achievement of the target of a 50% reduction in energy consumption this year, instead of in 2030

## May 2024

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Large-scale exercise in the Katerini Tunnel

## May 2024

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Road Safety Festival in Larissa

## June 2024

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Participation in European Awareness Day for motorway field workers

## June 2024

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Participation in the global Road Safety Campaign by HELLASTRON Greek Motorways

## July 2024

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Completion of the refinancing process for Aegean Motorway S.A.

## September 2024

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Gold & Silver awards at the leading technological innovation awards ceremony, PPC VITE Awards 2024

## October 2024

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Completion of bridge upgrade works in the Platykampos area

## November 2024

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Awarding of scholarships & tour of the Company's facilities for the 3 scholarship recipients and their families

## December 2024

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Completion of geotechnical restoration works - Ag. Theodoros junction

## December 2024

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Award at the Mobility Awards for the Safe Truck Parking Areas in Aerino

# T A GLANCE

## February 2024

Introduction of a new discount programme, “Moschochori Premium”

## April 2024

Completion of bridge upgrade works in the Aiginio area

## May 2024

Participation in the VINCI Safety Week

## May 2024

Completion & delivery of upgraded branch to Thessaloniki of the Katerini Tunnel

## June 2024

“Aegean Motorway: Sustainability & Road Safety”. TV tribute

## July 2024

Official opening of the Safe Truck Parking Areas in Aerino, Magnesia

## September 2024

Presentation at the STHEV workshop “The importance of ESG criteria for businesses”

## October 2024

New reduced toll prices on the motorway

## November 2024

Commencement of upgrade works on the rainwater tanks of the Platykampos bridge

## December 2024

Large-scale exercise in the T1 Tembi Tunnel



Our mission remains unchanged: to operate a motorway that serves the country's needs today while preparing for the future – a safer, cleaner and more resilient future. With dedication, knowledge and continuous development, we are working to ensure that Aegean Motorway continues to be a benchmark in sustainable development and modern infrastructure management.

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## Message from the CEO

For Aegean Motorway, 2024 was a year in which the principles of sustainable development were further integrated into the way we plan, operate and develop one of the country's most important road arteries.

In an environment where economic uncertainty, international energy pressures and the effects of climate change are creating new circumstances on a daily basis, our choice is clear: to remain a future-oriented organisation with stable values, expertise and an ambitious vision for our role in society.

Our sense of responsibility goes far beyond the reliable operation of a motorway. It concerns protecting the environment, enhancing road safety, supporting economic activity and fostering trust with the communities we serve. This understanding is at the heart of our strategy and shapes every decision and every investment.

In 2024, we recorded significant achievements that confirm the Company's strategic direction. We achieved an impressive **50% reduction in our energy consumption**, meeting an ambitious European target for 2030 well ahead of schedule. Exceeding this milestone is not just a technical achievement; it demonstrates our commitment to the energy transition and strengthens our position as a leader in responsible infrastructure management.

At the same time, investments in photovoltaic parks and other high energy efficiency solutions allow us to move steadily towards **energy neutrality**, strengthening our autonomy and operational resilience.





The climate challenges of 2024 have once again highlighted the need for infrastructure that is resilient to extreme events. Throughout the Mediterranean – and especially in Greece – the frequency and intensity of these events are increasing, with a direct impact on transport and public safety. Acting proactively, we have carried out extensive interventions to reinforce the motorway’s defences: flood protection works, upgrading of rainwater tanks and strengthening of emergency management protocols. These actions strengthen the cohesion of the road network and ensure that drivers can travel safely even under intense pressure.

Road safety remains a central pillar of our mission. Guided by the Vision Zero vision, we have invested in technology, cooperation with the relevant authorities and targeted enforcement of rules to prevent risks.

The installation and use of advanced detection systems has led to a **90% reduction in wrong-way driving** at the Leptokarya junction, while enhanced checks using the “smart tachograph” revealed more than **1,100 violations**, with total fines exceeding **€1.15 million**.

At the same time, 7,800 heavy vehicle drivers were identified for exceeding the permitted driving time limits, confirming the need for continuous, evidence-based and data-driven interventions. **Investments of €32 million in heavy maintenance** further enhanced the safety, resilience and reliability of the motorway for all users.

However, sustainable development is first and foremost about people. This year, we strengthened our partnerships with local suppliers and **invested over €31 million** in projects and supplies that support the regional economy and create lasting economic and social benefits. Our people – our employees, partners and local communities – are at the heart of our choices. Through dialogue, transparency and responsible corporate governance, we seek to meet their expectations and shape solutions with a long-term positive impact.

Moving forward, we remain committed to a strategy that combines three fundamental elements:

- **responsible and safe operation**, with continuous investment in technology and preventive maintenance
- **green transformation**, with an emphasis on energy efficiency, clean energy sources and climate resilience
- **social and economic contribution**, through partnerships that strengthen local development

Thank you for your continued support and trust.

**Dimitrios Gatsonis**  
Chief Executive Officer,  
Aegean Motorway S.A.



The concession period is 30 years from the date of commencement of the concession. At the end of the concession period, Aegean Motorway S.A. will hand over the motorway to the Greek State in full operation.

## Company History

**A**egean Motorway S.A. was established on 12 June 2007 with the sole purpose of entering into a contract with the Greek State as a Concession Company for the design, construction, financing, operation, maintenance and management of the Maliakos-Kleidi section of PATHE motorway. The Concession Agreement was signed on 28 June 2007 and ratified by Law 3605/08.08.2007.

The concession commencement date was set for 5 March 2008. Aegean Motorway S.A. officially took over the motorway on 20 March 2008, marking the start of the Company's operations.

On 20 October 2009, the electronic toll collection system became fully operational, while later that year, a significant rockfall incident in the Tembi Valley (17 December 2009) led to enhanced safety and monitoring measures. The upgrade of the existing motorway was completed on 31 December 2009, followed by the opening of the T1 tunnel (2 km) on 23 March 2010.

The economic recession of 2009 led to the suspension of funding, resulting in a significant slowdown in construction activity on the new sections from 1 June 2010 onwards. Progress continued with the opening of the T2 tunnel (6 km) on 31 May 2011 and the start of interoperability on 18 December 2012, improving connectivity across the motorway network.

Following successful negotiations with the Greek State, the Concession Agreement Amendment Agreement (C3A) was signed on 17 December 2013

and ratified by Law 4219/2013 (Government Gazette A' 269/11.12.2013), marking the finalisation of financing for the resumption of project works.

Subsequent milestones were the opening of the T3 tunnel (2.7 km) on 25 July 2014, the opening of the new sections of the motorway to traffic on 7 April 2017 and the completion of all construction works on 30 August 2017.

A new Agreement Amending the Concession Agreement, which adjusted the loan terms to the new economic environment with a positive impact on the Company and the State, was signed on 8 July 2024 and ratified by Law 5125/2024 (Government Gazette A 114/11.12.2024).



## Location and Headquarters

The headquarters of Aegean Motorway S.A. are located in Larissa (Moschochori, 41500), where the Management Departments and the Motorway Management Centre are housed.

Along the motorway, there are two Operation and Maintenance Centres in Moschochori and Leptokarya and two Technical Bases in Drymonas and Korinos. The main network of toll stations along the main axis includes five (5) Frontal Toll Stations in Pelasia, Moschochori, Makrychori, Leptokarya and Kleidi.

The four operate as a complex, supported by a total of seventeen (17) Ramp Toll Stations: 2 in Glyfa, 3 in Velestino, 2 in Monastiri, 2 in Kileler, 1 in Makrychori, 2 in Evangelismos, 2 in Gyrtani, 1 in Platamonas, and 2 in Leptokarya.

The main network is also supported by the Frontal Toll Station in Pyrgetos.

The "Maliakos - Kleidi" section passes through three (3) Regions - Central Greece, Thessaly, Central Macedonia, five (5) Regional Units - Fthiotida, Magnesia, Larissa, Pieria, Imathia, and twelve (12) municipalities – Stylida, Almyros, Volos, Riga Fereou, Kileler, Larissa, Tembi, Agia, Dion-Olympos, Katerini, Pydna-Kolindros, and Alexandria.

# Financial Data

All financial data of Aegean Motorway are posted on the company website:

[www.aegeanmotorway.gr](http://www.aegeanmotorway.gr)

## THE COMPANY



## FINANCIAL STATEMENTS

The following financial data relate exclusively to Aegean Motorway and not to subsidiaries or other companies.

### Financial data for Aegean Motorway 2024

Financial data (amounts in euros)	2024
Turnover (net)	102,508,447.69
Other ordinary income	667,634.42
Total income before interest	108,069,789.87
Operating costs	80,387,096.95
Employee salaries and benefits (included in operating costs)	13,107,724.21
Payments to lenders	-142,749,644.03
Taxes and social security contributions	26,212,130.62
Retained economic value	224,607,303.28

# Participation and awards

## ASSOCIATIONS, BODIES, ORGANISATIONS

Aegean Motorway actively participates as a member in international and national bodies. Company executives have been elected to leadership positions in these bodies and their individual working groups, contributing significantly, through sustainable

development goals, to the progress of the sector with the aim of continuously improving infrastructure and services to customers/users.

Indicative examples include:

■ **ASECAP** (European Association of Operators of Toll Road Infrastructures)

■ **Hellenic Institute of Customer Service** (EIEP)

■ **HELLASTRON** - HELLENIC ASSOCIATION of TOLL ROAD NETWORK

■ **I.O.A.S. "Panos Mylonas" Road Safety Institute**

■ **IBTTA** (International Bridge Tunnel & Turnpike Association)

■ **S.T.E.V.** (Association of Thessalian Enterprises & Industries)

■ **ITA** (International Tunnelling Association)

■ **STEAT** (Association of Higher Class Technical Companies)

■ **IRF** (International Road Federation)

■ **Association of SA-LLC** (Association of Public Limited Companies and Limited Liability Companies)

## CONFERENCES

In a constantly changing environment, where everything is evolving rapidly and the requirements of international and national regulatory bodies are being upgraded, creating new environments and new operating conditions, it is clear that vigilance, close monitoring and, where possible, active participation

in shaping such environment is crucial for companies. Aegean Motorway is consciously committed and closely monitors developments, participating, among other things, in international forums and conferences. Indicative examples of its participation in seminars, conferences and workshops are listed below:



# 1

Corporate Governance & Compliance Conference 2024

# 2

11th Information Security Conference

# 3

Interbalkan Conference on Occupational Health & Safety

# 4

16th Pan-Hellenic Conference of Legal Services Lawyers

# 5

8th International Conference on Asphalt, Mixtures & Pavements

# 6

4th Athens ESG Forum

# 7

Risk Management & Compliance Conference 2024

# 8

19th Panhellenic Concrete Conference

# 9

7th Compliance Conference/ Embracing change

# 10

4th Panhellenic Conference on Occupational Health & Safety

## AWARDS

In September 2024, Aegean Motorway was honoured with Gold and Silver Awards at the prestigious PPC BITE Awards 2024, one of Greece's leading institutions recognising excellence in technological innovation.

These awards highlight the Company's ongoing commitment to integrating cutting-edge digital solutions and sustainable practices into the operation and maintenance of motorway infrastructure. The recognition reflects Aegean Motorway's strategic focus on smart technologies that enhance road

safety, environmental performance and operational efficiency, in line with broader goals for sustainable development and innovation in transport.

In December 2024, Aegean Motorway was awarded the Silver Award at the Mobility Awards 2024, in the Motorway Safety category, for its Safe and Secure Truck Parking Areas on the Aegean Motorway (SSTPA) with Modern Parking Systems - Enhancing Road Safety and Goods Protection.

# Disclosures

## About this report

### SCOPE OF APPLICATION IN RELATION TO THE FINANCIAL STATEMENTS

The Sustainability Statement presents the performance of Aegean Motorway S.A. in environmental, social and governance (ESG) issues in line with the Sustainable Development Goals for the reporting period from 1 January to 31 December 2024, at Company level.



### GENERAL BASIS FOR THE PREPARATION OF THE SUSTAINABILITY STATEMENT

A Double Materiality Assessment (DMA) was conducted to assess the impacts, risks and opportunities for sustainability (Impacts, Risks, Opportunities, - “IRO”) based on defined selection criteria, in line with the European Sustainability Reporting Standards (ESRS). The criteria included factors such as stakeholder engagement, impacts, risks, opportunities, dependencies on ecosystems, energy, fuels, water resources and available human resources, as well as the entire value chain.

The Company’s intellectual and industrial property, such as patents, trademarks and other property rights, is a vital part of its asset portfolio. To ensure their proper use, all employees and executives must handle these assets responsibly and exclusively within the scope of their professional duties. In accordance with Articles 19a(3) and 29a(3) of Directive 2013/34/EU, the Company has chosen not to disclose certain information relating to intellectual property.

In line with its commitment to transparency, Aegean Motorway did not make use of the exemption allowing for the non-disclosure of future developments or ongoing negotiations.

The Company has adopted the United Nations agenda, as expressed in the 2030 Sustainable Development Goals, and has been publishing Annual Corporate Responsibility/Sustainable Development Reports since 2015, based on the Global Reporting Initiative (GRI) guidelines. This Report presents in detail the link between the programmes and actions of the reporting period and the Sustainable Development Goals.

This Report has been reviewed and verified by an external body with regard to specific elements of its content. The external body is fully independent and did not provide any related consulting services to the Company.

The conclusions and recommendations of the external body arising from the external assurance process are used to improve the Company’s processes and the quality of the Sustainability Statements that are disclosed.

All reports are available on the company website:  
<https://www.aegeanmotorway.gr/h-etairia/etairiki-koinwnikh-efthini/>

## Additional information

### TIME HORIZONS

In preparing its sustainability statement, Aegean Motorway adopted the following time horizons,

which are defined in relation to the end of the reporting period:

- **Short-term horizon: Financial year 2026**, which is one year after the Company's current reporting period.
- **Medium-term horizon: Financial years 2027 to 2028**, corresponding to a period of two years after the short-term horizon.
- **Long-term horizon: Financial years 2029 to 2050**, covering 22 years after the medium-term horizon, with the financial years 2030, 2040 and 2050 considered milestones, aligned with key global and European sustainability frameworks.

The financial year 2030 is considered a critical reference point due to the United Nations Sustainable Development Goals (in particular Sustainable Development Goals 8 and 9) and the EU's interim climate target under the Fit for 55 package, which requires a 55% reduction in greenhouse gas emissions compared to 1990 levels.

The financial year 2040 is recognised for its role in the EU's clean air policy and the zero pollution action plan, which establish this year as a key milestone for achieving significant reductions in air, water and soil pollution.

Finally, the financial year 2050 marks the commitment of the EU and the global community to climate neutrality, as defined by the Paris Agreement, the European Green Deal and the European Climate Law, which set binding targets for net-zero greenhouse gas emissions by mid-century.

These milestones provide a structured basis for long-term strategic planning, risk assessment and investment prioritisation.

### VALUE CHAIN INDICATORS

Measurements based on estimates of upstream and/or downstream data in the value chain using indirect sources mainly concern Scope 3 emissions. The estimates, assumptions and other considerations were determined by data limitations and aim to maximise the accuracy of the calculations to reflect the situation at Aegean Motorway.

The Company does not see the need to take additional measures to improve the accuracy of future measurements that include estimated value chain data, as these estimates are based mainly on Greece's energy mix, emission factors for emission calculations and recognised net calorific values for energy conversions.

All indicators, units of measurement, sizes and measurements in the statement follow internationally recognised standards and available best practices. Unless expressly stated, no restrictions, exceptions or modifications apply.

The 2024 Sustainability Statement does not include revised comparative data. This is the first Sustainability Statement by Aegean Motorway adapted to the CSRD Directive - therefore, no changes have been made other than the introduction of new metrics based on the Corporate Sustainability Reporting Directive (hereinafter "CSRD").

### CHANGES COMPARED TO LAST YEAR

The measurement methodologies for most of the CSRD-related indicators in this statement remain consistent with those used in previous years, and no additional restrictions, exceptions or modifications have been made unless explicitly stated in the statement.

### OTHER EU LEGISLATION INCLUDED

No information derived from other legislation has been disclosed in this statement.

# Governance

## THE ROLE OF THE ADMINISTRATIVE BODIES

**A**egean Motorway is a public limited company not listed on a stock exchange, with registered shares. The Company operates in accordance with Greek law, best international practices, the Company's Articles

of Association and the decisions of the General Meeting of Shareholders.

The current composition of the share capital of Aegean Motorway S.A. is as follows:

### Composition of the Share Capital

Shareholder	Percentage of Participation in the Share Capital of the Concessionaire
HOCHTIEF PPP Solutions GmbH	38.89%
AVAX CONCESSIONS SINGLE-MEMBER S.A.	23.61%
AKTOR CONCESSIONS SINGLE-MEMBER S.A.	22.22%
VINCI CONCESSIONS SAS	15.28%

The Company's Supreme Administrative Bodies are the General Meeting, in which the four shareholders participate, and the Board of Directors.

The election of the members of the Supreme Administrative Bodies is determined by the Company's Articles of Association and by individual Shareholder Agreements, which were drawn up when the Company was established.

The General Meeting of Shareholders is composed of persons authorised by the Shareholders on the basis of specific legal documents, who may belong to the executive management team of each Shareholder, be lawyers or other executives.

The Board of Directors consists of 11 members with a 3-year term of office, who are not remunerated, who represent all Shareholders based on each Shareholder's percentage of participation in the Share Capital, and who are elected by the General Meeting of Shareholders in accordance with Article 20 of the Company's Articles of Association. The elected members have professional qualifications (engineers, economists) and sufficient insight to enable them, on the one hand, to understand, supervise adequately and decide effectively on issues arising in relation to the concession project and corporate governance,

and on the other hand, to devise long-term strategies for adaptation, resilience and sustainable development. All have previous experience in concession projects, participate in specialised committees in international organisations in the sector and monitor, participate in and are able to take decisions that are important for the sustainable development of the sector at European and international level. Due to their multi-level education and experience, it is customary for members to hold corresponding positions of responsibility in other legal entities belonging to each shareholder's group.

The Board of Directors delegates a significant part of its responsibilities and decisive authority on specific issues (subject to the more specific provisions of the Articles of Association) to substitutes (members of the Board of Directors and third parties).

The Chairman of the General Meeting and the Board of Directors is also a designated executive legal representative of the Company.

In order to avoid conflicts of interest, the Annual General Meeting of Shareholders grants the special authorisation provided for by company law on an annual basis.

The latest composition of the Company's Board of Directors, as formed on 11.09.2024, is shown below:

Name	Position
Oliver Wagner	Chairman
Georgios Syrianos	Vice-President
Dimitrios Gatsonis	Managing Director and Chief Executive Officer
Peter Hubert Coenen	Member
Panagiotis Perris	Member
Maria Eleni Nitsopoulou	Member
Panagiotis Papanikolas	Member
Francois Regis Le Miere	Member
Georgios Papageorgiou	Member
Apostolos Mytilis	Member
Nikolaos Spyridonakos	Member



	MEN			WOMEN		
Board of Directors	Age <30	Age 30-50	Age >50	Age <30	Age 30-50	Age >50
Number of Members	-	1	9	-	-	1
Percentage	-	9%	82%	-	-	9%

The overall representation of both genders on the Board of Directors is approximately 91% men and 9% women.

The Company's Board of Executive Directors (hereinafter referred to as "BoE") consists of four (4) members, each over the age of 50.

Board of Executives	Age <30	Age 30-50	Age >50
Number of Members	-	-	4
Percentage	-	-	100.00%

As Aegean Motorway is not listed on an organised stock exchange, it is not subject to the legal requirement to elect independent members to its Board of Directors, as stipulated by national corporate governance legislation.

Currently, the Board of Directors (BoD) does not include members with a specific mandate to represent employees, and there is no formal mechanism for employee representation at BoD level.

For its proper functioning, Aegean Motorway has been organised into four Divisions, which are headed by **four Executive Directors**:

- **Management**
- **Finance**
- **Operation**
- **Technical Division**

Decision-making on all matters determining the Company's objectives and the manner of implementing the decisions taken is the responsibility

of the specific group of Executive Directors, who form the Board of Executives (BoE) and who:

➤ Meet regularly to make decisions and review pending issues

➤ Assign further responsibilities to individuals and project teams

➤ Supervise the persons to whom responsibilities have been assigned

➤ Evaluate the progress of processes

The Board of Directors is informed on a monthly basis through reports as well during the BoD meetings, which take place on a regular - usually bimonthly - basis. Critical issues that concern the Company and

affect its overall operation are examined thoroughly, preventive and/or corrective actions are defined, and their implementation is monitored. Decision-making is recorded in the relevant minutes.

Aegean Motorway S.A. recognises that the prevention, management and elimination of conflicts of interest is a prerequisite for its smooth and integrity-based business operations.

The established Conflict of Interest Policy recognises all situations that create a potential conflict of interest in the Company and sets out the framework of its obligations in relation to them, ensuring its compliance with the applicable legislative and regulatory framework and ensuring the necessary vigilance of employees and associates against actions

that fall within the concept of bribery. The Compliance Officer reports to the Executive Board at regular intervals.

The process of evaluating the effectiveness and efficiency of the above administrative bodies and the relevant reports are kept confidential.

The Company's Management is supported by Committees set up by specialised Company employees with specific objectives and targets.

## INFORMATION PROVIDED TO THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES OF AEGEAN MOTORWAY AND SUSTAINABILITY ISSUES EXAMINED BY THEM

The supervision of sustainability and ESG issues falls within the remit of the BoE and the following administrative bodies:



Risk Management Committee



Road Safety Committee



Energy Committee



Information Security Risk Assessment Committee



Health & Safety and Social Responsibility Committee

Below, their responsibilities regarding the overall management of impacts, risks, opportunities (IRO) and related objectives are described in more detail.

The Risk Management Committee plays a critical role in identifying, assessing and managing both risks and opportunities that could affect the Company's objectives. It ensures that the organisation is well prepared to mitigate potential risks while capitalising on emerging opportunities.

The Committee oversees the setting of clear objectives related to significant risks and opportunities, ensuring that these objectives are aligned with the Company's overall strategy. In addition, it monitors progress toward these objectives by regularly reviewing performance metrics, evaluating the effectiveness of mitigation strategies, and adjusting actions as necessary to ensure continued resilience and growth.

The Road Safety Committee is responsible for identifying, assessing and managing road safety risks and opportunities within the organisation. It ensures

that protocols are in place to mitigate risks and protect the public. The Committee sets clear safety performance targets and monitors progress through regular reviews of safety indicators, evaluating the effectiveness of initiatives and adjusting strategies as needed to ensure continuous improvement and regulatory compliance.

The Energy Committee is responsible for identifying, assessing and managing energy-related risks and opportunities within the organisation. It ensures the implementation of efficient energy practices and the reduction of consumption across all operations.

The Committee sets measurable energy efficiency targets and monitors progress, regularly reviewing performance data, evaluating the success of energy-saving initiatives and adjusting strategies to optimise energy use and achieve sustainability goals.



The Information Security Risk Assessment Committee is responsible for identifying, assessing, and managing information security risks across the organisation. It ensures that robust security measures are in place to protect sensitive data and systems from potential threats.

The Health, Safety and Social Responsibility Committee, with the participation of employees elected by their colleagues from all facilities and departments of the Operations Division, contributes significantly to the identification, assessment and management of both risks and opportunities related to employee safety.

The Committee meets regularly, every six months, with the Company's Management and senior executives to discuss issues related to Health and Safety at Work and broader environmental management and social responsibility issues.

Each Committee, according to its specialisation, is responsible for monitoring trends at national and international level, as well as regulatory developments in the field of sustainability that could significantly affect the Company's activities.

It also assesses the Company's performance in implementing its annual business and strategic plan, providing updates to the BoD.

Together, these committees report to the BoD on how they support the Company's long-term commitment to value creation.

They also oversee the implementation of responsible and ethical business practices, guided by ESG criteria and indicators, in line with the Company's sustainability-related policies, which are referenced throughout the sustainability statement.

Decisions on setting objectives related to material impacts, risks and opportunities and the way the relevant progress shall be monitored – in other words, the Company's objectives and the way decisions are

implemented, is the responsibility of the specific group of Executive Directors who make up the Board of Executives (BoE) and who:

➤ Meet regularly to make decisions and review pending issues

➤ Assign further responsibilities to individuals and project teams

➤ Oversee the persons to whom responsibilities have been assigned

➤ Evaluate the progress of procedures

The Board of Directors is informed on a monthly basis through reports as well during the BoD meetings, which take place on a regular - usually bimonthly - basis. Critical issues that concern the Company and

affect its overall operation are examined thoroughly, preventive and/or corrective actions are defined, and their implementation is monitored. Decision-making is recorded in the relevant minutes.

## MONITORING OF SUSTAINABILITY MATTERS

The DMA was completed in 2025, with the validation of the final impacts, risks and opportunities that were assessed as material and are subject to consultation in the Risk Management, Road Safety, Energy, Information Security, Health & Safety and Social Responsibility Committees and to the Managing Director.

The Company's highest administrative body is the Board of Directors, in which the four shareholders are represented. In turn, the Board of Executives (BoE) is in direct and interactive communication with the Committees regarding the results and effectiveness of policies, actions, measurements and targets adopted to address material issues, particularly in high-risk areas, as well as any negative impacts that may have arisen.

Aegean Motorway has identified 44 material impacts, risks and opportunities (IROs) covering 7 key sustainability issues.

Based on the results of the DMA, the administration bodies, together with the managers of the relevant departments, formulate long-term strategies for adaptation, resilience and sustainable development.

Impacts, risks and opportunities are assessed during the monitoring of the Company's strategy, prior to significant actions and during the risk management process, including whether the hedges related to these impacts, risks and opportunities have been tested.



## DUE DILIGENCE

The Company is firmly committed to respecting human rights in accordance with applicable laws and standards for human rights and labour at national, European and international level in accordance with the principles of the International Labour Organisation. To support this commitment, the Company implements procedures to identify, assess

and address actual or potential adverse human rights impacts that may arise from its own activities or that could be directly or indirectly linked to its activities or services through its business relationships. The “nominal” minimum social guarantees cover the following areas:

### 01 Human rights - due diligence

During the reporting period, Aegean Motorway continues to strengthen its commitment to human rights through its “Human Rights Protection Policy”, which ensures the fair treatment of employees, customers, shareholders and society, with a firm stance against any violation of human rights.

The Policy applies to all Company personnel, regardless of hierarchical level, laying the foundation for respect for internationally recognised human rights in all its activities and value chain. Furthermore, the “Due Diligence Procedure” describes how the

Company, through audits, applies due diligence rules when selecting suppliers, contractors and service providers.

In addition, the Company applies the Code of Conduct for business partners - suppliers, which covers issues of compliance with applicable National and European Legislation, promotes respect for human rights and labour relations, requires compliance with health and safety legislation and promotes environmental protection.

## 02 Fair competition

The Code of Conduct for business partners - suppliers promotes and enforces fair competition. Business Partners must respect the rules of antitrust and

competition law when participating in public tenders and private sector bids, as well as in their daily business practices.

## 03 Fighting corruption

In accordance with the regulatory compliance programme - and due diligence - in the selection and management of business partners, all contracts entered into are governed by terms relating to the regulatory compliance of the contracting parties.

In order to ensure that the entities with which it enters into commercial contractual relationships comply with the applicable legislative and regulatory framework, the Company:

A. draws up almost all commercial agreements it enters into in writing,

B. all contracts it enters into with third parties include a relevant clause whereby the counterparties undertake to comply with the applicable legislative and regulatory framework, with particular emphasis on compliance with laws and provisions relating to the elimination of corruption, monopolies, money laundering and relevant criminal provisions; at the same time, they are required to report any investigation for violation of the relevant provisions during the contractual relationship or any conflicts of interest. In the event of a deviation from this

commitment, a relevant clause is activated, which is included in the standard contracts and which provides for the termination of the contract with immediate effect and the payment of relevant compensation if it has suffered relevant damage or claims have been brought against it.

In addition, the Code of Conduct for business partners - suppliers requires abstention from acts of influence (bribery), corruption and money laundering. Business partners must not engage in acts of bribery, offering or accepting gifts to employees or executives of the Company to secure, maintain or expedite a commercial transaction or in any act that violates the applicable framework for money laundering. Similarly, they must not engage in similar acts of bribery, offering or accepting gifts to organisations and government officials.

In addition, they are required to have corporate mechanisms in place to combat bribery and corruption, applying zero tolerance, and to ensure that their employees and third-party partners are aware of the implementation of this policy.

## 04 Tax compliance

Law 4557/2018 incorporated Directive (EU) 2015/849 of the European Parliament and of the Council of 20 May 2015 “on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, amending Regulation (EU) No 648/2012 of the European Parliament and of the Council and repealing Directive 2005/60/EC of the European Parliament and of the Council and Commission Directive 2006/70/EC” (EU L 141 of 5.6.2015). Within the above legal framework, the European Commission maintains and updates a list

of all natural and legal persons, organisations and entities subject to the freezing of funds and assets (asset freeze). This list also includes persons subject to United Nations sanctions (asset freeze). The list is also published online.

In the future, Aegean Motorway intends to publish additional information on minimum social guarantees based on the EU classification regulation, also based on its expected revision.

## RISK MANAGEMENT AND INTERNAL CONTROLS

Aegean Motorway promotes a culture of responsibility and proactive risk management by implementing a structured mechanism that systematically incorporates the findings of risk assessments and controls related to the sustainability reporting process. This mechanism has identified only a limited number of risks related to sustainability reporting, which are effectively addressed by inherent controls.

The risks stem mainly from the level of accessibility and synchronisation of data from the upstream and/or downstream parts of the value chain and the possible overestimation or underestimation of sustainability achievements, resulting in a lack of trust among stakeholders. The mechanism for addressing these risks includes data collection mechanisms across

all departments and facilities, as well as review processes by key internal stakeholders regarding sustainability data management and consolidation.

The sustainability risk assessment strategy is aligned with Aegean Motorway's integrated risk management framework. This alignment ensures consistency in the assessment, prioritisation and management of risks across the Company, promoting a unified and systematic approach. The Risk Management Committee strengthens the functioning of the Internal Audit System by setting principles and establishing and implementing appropriate and up-to-date policies and procedures for risk management, including identification, assessment, quantification/ measurement, monitoring, control and management.



# Strategy

## STRATEGY, BUSINESS MODEL AND VALUE CHAIN

### Business model

Aegean Motorway ensures uninterrupted, 24-hour operation throughout the year, providing a consistently high level of service to road users. In 2024,

the Company processed a total of 29,605,412 toll transactions. Of these:

➤ 76% (22,487,101 transactions) concerned Category 1 (motorcycles) and Category 2 (passenger cars)

➤ 24% (7,118,311 transactions) concerned Category 3 and 4 vehicles (trucks and buses)

➤ It is worth noting that 53% (15,672,566 transactions) were carried out via electronic toll lanes, marking an increase of 15.32% compared to 2023

To maintain the quality and safety of its operations, Aegean Motorway offers a comprehensive range of services, such as:

- Traffic and incident management: Rapid detection and handling of incidents to ensure user safety
- Regular maintenance: Ensures the continuous functionality of the motorway infrastructure
- Winter operations: In cooperation with public authorities, the motorway remains accessible and safe during adverse weather conditions
- Oversized/overweight vehicle management: Coordinated supervision of large vehicle traffic
- Rest areas: Short-stay parking and toilets for drivers
- Accessibility services: Support for toll transactions involving persons with disabilities
- Technical policing: Regular monitoring and enforcement of traffic regulations
- Emergency maintenance: Rapid response to unforeseen damage or operational disruptions
- Heavy maintenance: Structural upgrades, replacements and modernisation efforts beyond the scope of routine maintenance
- Motorist service stations: Fully equipped facilities available to travellers
- Customer service: System for managing user feedback and complaints
- Toll collection: Reliable and efficient toll systems at all access points

Through this operational framework, Aegean Motorway remains committed to providing safe, efficient and user-focused infrastructure.

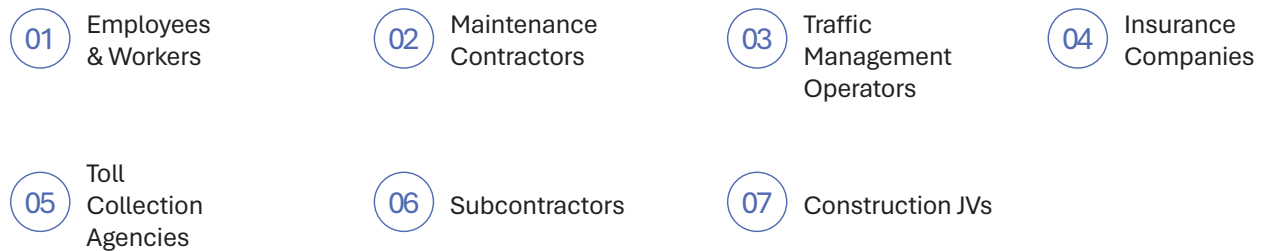
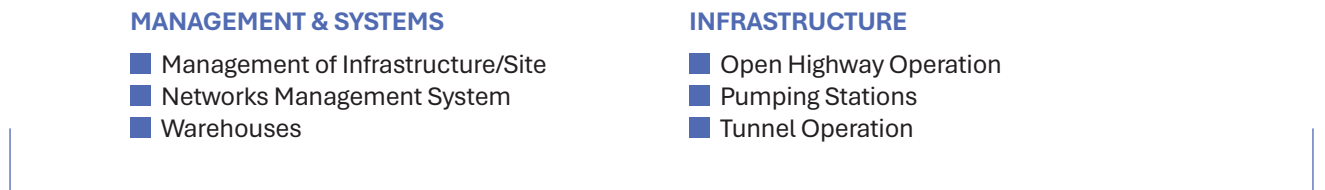
# Value chain

Below are the key players in the value chain and the main activities of Aegean Motorway.

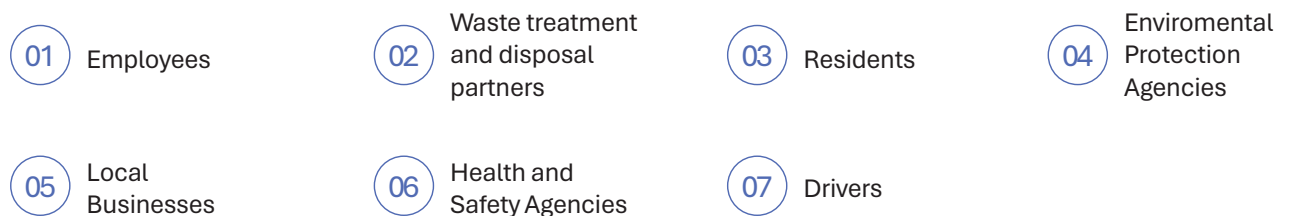
## UPSTREAM RAW MATERIALS / SUPPLIERS



## MIDSTREAM PRODUCTION / TRANSPORTATION



## DOWNSTREAM - CUSTOMERS / END USERS



## INTERESTS AND OPINIONS OF STAKEHOLDERS

### Stakeholder groups

Aegean Motorway considers all partners and entities that influence or are influenced by its activities and operations to be stakeholders. Interaction with stakeholders is ongoing throughout the year, through two-way communication and information channels. Stakeholders receive information through annual reports, questionnaires

distributed every two years, meetings, announcements and correspondence. The table below lists the various stakeholders, the main requirements of each group, and the methods and frequency of communication, with the aim of understanding their needs and addressing issues of common interest.

Stakeholders	Basic requirements
End users	<ul style="list-style-type: none"> <li>■ Road safety</li> <li>■ Uninterrupted and smooth operation</li> <li>■ Rapid response to incidents</li> <li>■ Toll prices</li> <li>■ Discount packages</li> <li>■ Good infrastructure condition</li> <li>■ Maintenance work progress</li> </ul>
Employees	<ul style="list-style-type: none"> <li>■ Safe working environment</li> <li>■ Project sustainability</li> <li>■ Training</li> <li>■ Open door policy</li> <li>■ Company benefits policy (group insurance plan, company vehicles and phones, etc.)</li> <li>■ Equal opportunities &amp; meritocracy</li> </ul>
Shareholders	<ul style="list-style-type: none"> <li>■ Company financial results</li> <li>■ Sources of risk (various risks, e.g. maintenance work, legal, financial, etc.)</li> </ul>
Banks	<ul style="list-style-type: none"> <li>■ The Company's financial results</li> <li>■ Sources of risk (various risks, e.g. maintenance work, legal, financial, etc.)</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>■ Transparency/meritocratic management</li> <li>■ Timely payment</li> <li>■ Ability to participate in competitive procedures</li> </ul>
Affected communities	<ul style="list-style-type: none"> <li>■ Maintenance work</li> <li>■ Support for the local community</li> <li>■ Toll costs</li> <li>■ Possibility of utilising local actors and resources in the implementation of the project</li> <li>■ Employment by the local community</li> <li>■ Requests for sponsorships, donations</li> </ul>

Stakeholders	Basic requirements
Media	<ul style="list-style-type: none"> <li>■ Updates and systematic information</li> <li>■ Advertisements &amp; listings</li> <li>■ Toll policy</li> <li>■ Incidents on the motorway</li> <li>■ Interview requests</li> </ul>
Police / fire brigade	<ul style="list-style-type: none"> <li>■ Anything related to the implementation of policing and firefighting contracts</li> </ul>
Greek State	<ul style="list-style-type: none"> <li>■ Compliance with contractual obligations</li> <li>■ Effective communication and cooperation</li> </ul>
Other motorways	<ul style="list-style-type: none"> <li>■ Interoperability</li> <li>■ Joint actions and practices</li> </ul>
Other bodies	<ul style="list-style-type: none"> <li>■ How the project is implemented (technical methods used)</li> <li>■ The impact of the project on the environment</li> <li>■ Requests for visits to the project</li> <li>■ Requests for conference sponsorships and joint actions</li> <li>■ Compliance with environmental and labour legislation</li> <li>■ Compliance with occupational health and safety legislation</li> <li>■ Company performance in environmental protection, personnel management, occupational safety, motorway safety</li> </ul>

## STAKEHOLDER ENGAGEMENT

The Board of Executives (BoE) of Aegean Motorway follows a structured approach to informing the Communications Department and the Committees about the views and interests of Management.

Stakeholders monitor the Management’s engagement and communication strategies to understand its interests and provide information on key issues related to significant opportunities and/or risks (IROs).

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Aegean Motorway has identified its material impacts, risks and opportunities through the double materiality assessment process. Each material topic, such as resource use and the circular economy, pollution, climate change and governance, has been assessed and the Company’s most significant impacts have been identified, along with the impact on its activities, its ability to create long-term value, to comply with

regulatory obligations and to maintain responsible environmental and social performance throughout its value chain. The results, as well as the corresponding risks and opportunities, are presented in the section “Description of the material impacts arising from the materiality assessment,” in accordance with the European Sustainability Reporting Standards (ESRS), in each chapter of this report.





# Managing impacts, risks and opportunities

## IDENTIFICATION OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

### Double materiality assessment methodology

The Double Materiality Assessment (DMA) process is a critical tool for identifying, defining and evaluating Aegean Motorway's priorities for sustainable development. The Company systematically applies the impact assessment process, and during the reporting period, the Company expanded the scope of the assessment to include financial materiality and additional value chain actors in light of the Corporate Sustainability Reporting Directive (CSRD).

As part of its commitment to stakeholders, the Company continuously monitors its impact on society and the environment. The dual materiality assessment involves evaluating the Company's impact on sustainability issues from two different perspectives:

- Materiality of impacts, which examines the impact of Aegean Motorway's activities on environmental and human sustainability issues.
- Financial materiality, which examines how sustainability issues affect the Company's value creation and financial performance.

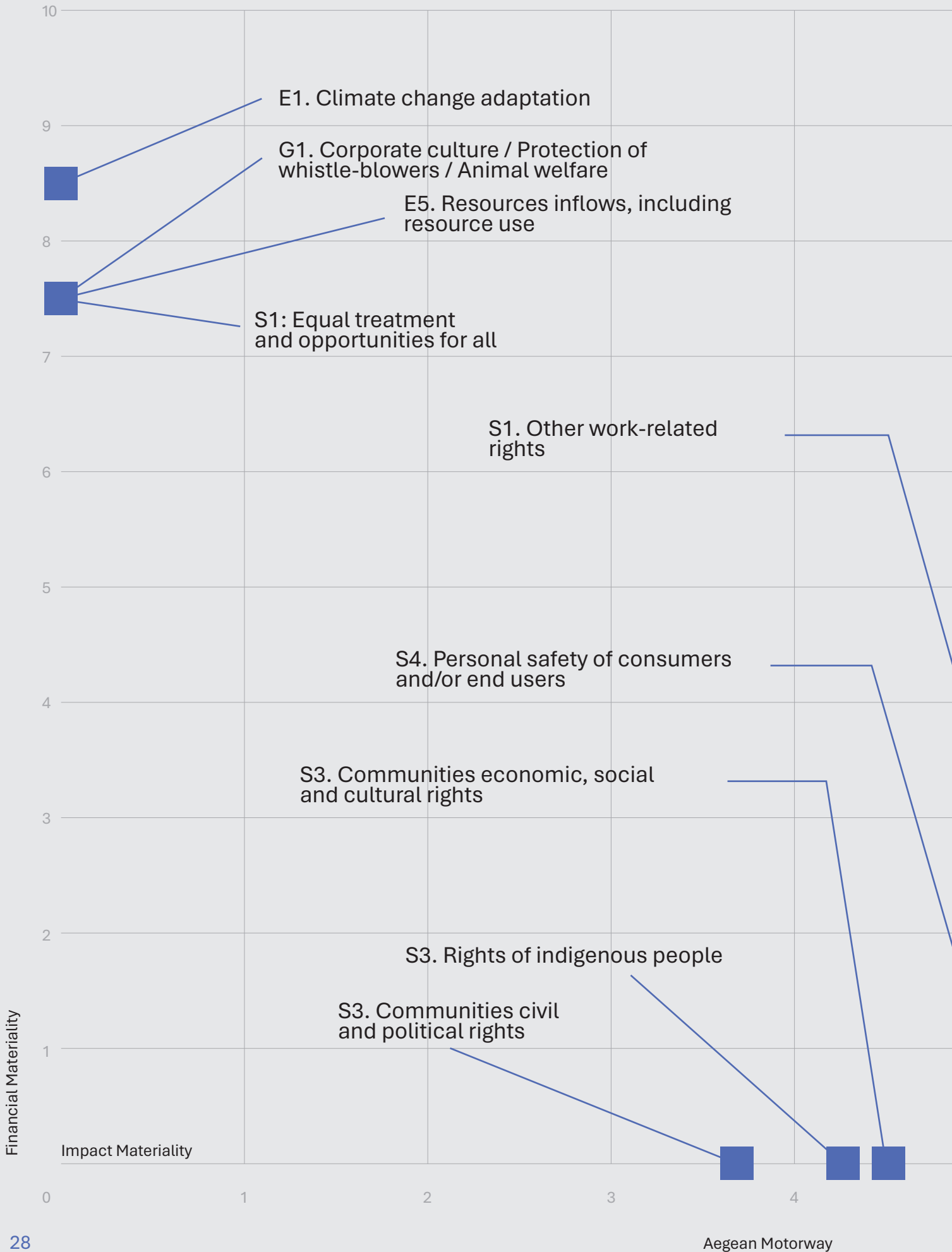
DMA is an important tool in its strategic business plan for transformation and sustainable development, which is designed to anticipate and address stakeholder expectations, regulatory changes and risks and opportunities related to sustainability.

The methodology includes the following steps:

- Identifying stakeholders and mapping the value chain
- Recording impacts, risks and opportunities
- Materiality of impacts
- Financial materiality
- Rating impacts, risks and opportunities
- Validation of impacts, risks and opportunities

**Priority-based materiality matrix**

All material sustainability topics identified through the DMA are presented in the table below.



E1. Climate change mitigation

S1. Working conditions

E1. Energy

E2. Pollution of air, water and soil

E2. Substances of concern and substances of very high concern

E5. Waste/Resource outflows related to products and services

S4. Information related impacts for consumers and/or end users

S4. Social inclusion of consumers and/or end users

E2. Microplastics

## INTEGRATION OF DOUBLE MATERIALITY ASSESSMENT INTO DMA

The DMA process adopted by Aegean Motorway is aligned with the European Sustainability Reporting Standards (ESRS), as it incorporates both economic materiality and impact materiality aspects. This allows the Company not only to identify and manage

the impacts of its operations throughout the value chain, on the environment and people, even when conditions change or new activities arise, but also to comply with evolving regulatory requirements.

## DMA GOVERNANCE

The Board of Executives (BoE) of Aegean Motorway is responsible for ensuring that each impact, risk

and opportunity (IRO) is accurately attributed in terms of language and scope.

## DMA APPROACH PER ENVIRONMENTAL THEMATIC STANDARD

### Pollution

Aegean Motorway recognises the significant environmental impacts that pollution, including air, water and soil contamination, can have on both local ecosystems and human health. In line with its commitment to environmental sustainability, the Company has developed a structured approach to identifying, assessing and managing the significant risks and opportunities related to pollution arising from its activities.

This comprehensive process involves reviewing the Company's activities, as well as those of its upstream and downstream value chain partners, to assess both actual and potential pollution-related impacts.

Specifically, Aegean Motorway focuses on the following key areas:

- 01 Air pollution:** Emissions from construction and operational activities, including transport-related air pollutants.
- 02 Water pollution:** Contamination from runoff, waste disposal and wastewater management during construction and maintenance.
- 03 Soil pollution:** Risks of contamination from hazardous waste, improper disposal and development activities.

### Methodologies, tools and assumptions

To assess and mitigate the effects of pollution, Aegean Motorway uses the following methodologies, tools and assumptions:

**Dual materiality approach:** The Company incorporates dual materiality assessment into its evaluation of the economic and environmental impact of pollution. This approach examines the direct impact of the Company's activities on the levels of pollution, as well as the long-term risks and opportunities associated with pollution control, regulatory compliance and environmental performance.

**Benchmarking:** The Company regularly compares its pollution management strategies with national and international best practices in pollution control and sustainable infrastructure. This ensures that the Company's practices are aligned with the highest environmental protection standards and contribute to the continuous improvement of its pollution management efforts.

These procedures enable Aegean Motorway to identify key opportunities, such as reducing emissions by improving operational efficiency, strengthening water and soil pollution control measures, and implementing sustainable waste management

practices. They also highlight risks related to air quality deterioration, water pollution from runoff, soil pollution, and the potential impact of stricter environmental regulations.

## RESOURCE USE AND CIRCULAR ECONOMY

At Aegean Motorway, effective resource management and minimising environmental impact are key pillars of the Company's sustainability strategy. In line with its commitment to the principles of the circular economy, the Company has developed comprehensive procedures for identifying, assessing and managing significant environmental and

operational impacts, risks and opportunities related to resource use in all aspects of its activities.

These procedures are designed to ensure that the Company's activities are aligned with best practices for sustainability and resource efficiency, as well as to meet legal and regulatory requirements.

### Methodologies, tools and assumptions

Specifically, Aegean Motorway focuses on key areas such as resource inputs and outputs, as well as waste management. To identify the potential and actual impacts related to these areas, documented methodologies incorporating both qualitative and quantitative approaches are applied.

Through a double materiality assessment, the Company evaluates how its activities, as well as those in its upstream and downstream value chain, can affect the environment and economic performance, and vice versa.

The double materiality assessment process is an integral part of identifying long-term environmental risks and opportunities that may arise from resource use and waste generation. It involves a systematic review of key activities, such as manufacturing,

maintenance and operational processes, to identify patterns of resource consumption and waste generation that could pose risks to environmental sustainability.

In the context of opportunities, the Company develops strategies to mitigate these risks through the adoption of circular business models and efforts to increase the use of secondary raw materials, as well as improved waste management practices.

The results of the double materiality assessment are used to inform the Company's resource management strategies and policies. These strategies are reviewed regularly, with ongoing monitoring and reporting processes to track progress and identify areas for further improvement.

Consultation with stakeholders:

Aegean Motorway works with a wide range of stakeholders, including internal teams, local communities and environmental organisations, to evaluate and improve its resource use and waste management strategies.

This ongoing engagement ensures that the Company's practices remain relevant and aligned with the needs of its stakeholders.

Benchmarking:

To maintain high standards in circular economy practices, Aegean Motorway evaluates its resource management strategies against best practices at national and European level.

This process ensures the continuous improvement of resource use and waste management systems to meet or exceed industry standards.



## GOVERNANCE

**A**egean Motorway has implemented a structured process for identifying, assessing and prioritising material impacts, risks and opportunities related to governance, sustainability and responsible corporate behaviour. The process is based on a dual materiality approach, ensuring that both economic impacts and environmental, social and governance factors (ESG) are taken into account when assessing the Company's long-term value creation and operational resilience.

Through this approach, Aegean Motorway assesses the potential impact of its decisions and activities on stakeholders, as well as the risks and opportunities arising from external trends, including regulatory developments, market conditions and social expectations. Criteria such as location of operation, type of project, contractual structures, sector-specific challenges and regulatory requirements are used to assess the significance of each risk or opportunity related to governance.

The Company also examines the broader governance context of its activities, covering compliance with legal and contractual obligations, transparency and accountability in decision-making, risk management and ethical practices at all levels of operation.

Projects, partnerships and service agreements are analysed to identify potential governance risks or opportunities that may affect operational integrity, regulatory compliance and stakeholder trust.

Stakeholder engagement is incorporated into the internal governance assessment to ensure that relevant perspectives from within the Company – such as employees, management teams and business units – inform decision-making processes.

This focus allows Aegean Motorway to comprehensively identify governance-related impacts, manage related risks and capitalise on opportunities to enhance corporate responsibility, transparency and internal control mechanisms, thus supporting effective and responsible management at all levels of the organisation.



# Climate change

## GOVERNANCE

### Climate leadership

**P**rogress monitoring and transparency are fundamental elements of Aegean Motorway's corporate governance, strategy and risk management framework, with climate-related indicators playing a decisive role. These indicators are incorporated into decision-making processes and evaluated with the same importance as other key performance indicators (KPIs), creating a dynamic feedback mechanism that evolves over time. By incorporating climate-related indicators into its governance structure, the Company

gains valuable insights into the potential impacts of climate-related risks and opportunities on various aspects of its operations.

The Board of Executives and the Energy Committee, as key administrative entities, play a critical role in ensuring the long-term success of Aegean Motorway, while taking into account climate-related risks that could affect its operations and shareholder value. The Company has established the Energy Committee to implement its energy policy.

The Committee is also responsible for overseeing initiatives aimed at reducing energy consumption, increase the use of alternative energy sources, reduce greenhouse gas emissions and promote sustainable energy use.

### Transition plan for climate change mitigation

Climate change has become an undeniable global reality and one of the most significant challenges of our time. Its widespread effects are increasingly evident in all aspects of daily life. As the operator of key national motorways and infrastructure, Aegean Motorway recognises the critical importance of this issue and addresses it with unwavering commitment and responsibility.

In line with the Company's role and values, it is also setting new, ambitious targets focused on enhancing road safety and promoting sustainable development in all its activities.

Aegean Motorway takes into account the goals of the Paris Agreement, aiming to put climate change at the heart of its strategy. The Company is committed to achieving its net-zero goal.

This commitment concerns the direct activities of Aegean Motorway (Scope 1 and 2), while efforts are also being made to include indirect emissions throughout the value chain (Scope 3), actively contributing to the transition to a sustainable energy economy. In line with the Corporate Sustainability Reporting Directive (CSRD) and in support of the above objectives, Aegean Motorway will develop a comprehensive transition plan in the medium term.

This plan will respond to the rapidly evolving energy environment and aim to create long-term value by modernising core operations and exploring opportunities in renewable energy sources (RES) and clean energy solutions.

Aegean Motorway has incorporated potential transition risks related to emissions into its strategic risk management mechanisms, addressing both the financial and operational challenges arising from the transition to a sustainable economy. Aegean Motorway's environmental costs are categorised according to decarbonisation levers.

These drivers include investments that have been incorporated into the Company's medium-term planning and contribute to the achievement of its climate goals.

Although the Company's potential committed greenhouse gas emissions originate from the intermediate stage of the value chain, which by definition cannot be significantly changed, these emissions are not expected to jeopardise the achievement of the Company's reduction targets.

During the reporting period, the Company invested in and financed climate change mitigation and adaptation actions that will be an integral part of the transition plan going forward.

Although there was no legal obligation under Commission Delegated Regulation (EU) 2021/2178, a preliminary eligibility assessment was carried out.

The following diagrams show the financial resources allocated to the action plan, including both the operating expenses (OpEx) and capital expenses (CapEx) required for its implementation.

## OPEX EXPENSES

324,507 €

Protection and Maintenance of Green Spaces and New Plantings / Irrigations

104,659 €

Cost of Social Environmental Actions

44,186 €

Environmental Studies

3,424 €

Operating / Maintenance Costs of Air Pollution Monitoring Stations

2,232 €

Analyses/Laboratories

## CAPEX EXPENSES

Infrastructure Resilience  
Enhancement Projects

30,549.500 €

Maintenance / Upgrade  
of Irrigation System

16,225 €

At this point, it is worth noting that the Company is not involved in coal, oil and natural gas production activities. Furthermore, Aegean Motorway is not excluded from the EU benchmarks linked to Paris.

**Identification of impacts, risks and opportunities**

Aegean Motorway recognises the profound and widespread impacts of climate change on the environment and society. To proactively address these challenges, the Company has developed a comprehensive framework for assessing and addressing climate-related risks and opportunities across all of its activities and value chain. This framework is based on the Company’s dual

materiality perspective, which takes into account both the environmental consequences and the financial significance of climate change. Engagement with key stakeholders, combined with continuous benchmarking against industry best practices, strengthens the Company’s ability to adapt to climate risks and advance its climate resilience and sustainable development goals.

Description of the material impacts resulting from the materiality assessment

**Description of risks and opportunities**

Material risks and opportunities				
Section	Subsection	Description	Characterisation	Time horizon
E1. Climate change	Adaptation to climate change	Developing infrastructure that can handle extreme weather — such as flood-resistant bridges and pavement materials that can handle high temperatures — can minimise repair costs and revenue losses due to downtime, as well as reduce recovery times after forced shutdowns, ensuring business continuity.	Opportunity	Short term
E1. Climate change	Adaptation to climate change	The implementation of an efficient energy management system — such as EN ISO 50001:2018 — not only contributes to reducing emissions and aligning operations with global climate goals, but also creates opportunities to reduce energy costs, improve operational efficiency and enhance access to green financing and sustainability-based revenues.	Opportunity	Short term

Material risks and opportunities				
Section	Subsection	Description	Characterisation	Time horizon
E1. Climate change	Adaptation to climate change	Rising temperatures, flooding and other extreme weather events — which are expected to occur more frequently and intensely due to climate change — pose significant risks to road infrastructure, bridges and tunnels. These risks can accelerate deterioration, increasing repair and maintenance costs, while also causing service interruptions, increased insurance premiums and reduced availability, significantly reducing revenue.	Risk <sup>1</sup>	Short term
E1. Climate change	Climate change mitigation	Transitional opportunities arising from climate change regulations — such as growing demand for sustainable infrastructure and low-carbon technologies — are driving adaptation, innovation and alignment with evolving standards, and positioning the Company as a leader in climate-resilient road and bridge infrastructure, ultimately strengthening revenues.	Opportunity	Medium term
E1. Climate change	Mitigation of climate change	The integration of sustainable mobility solutions — such as electric vehicle charging infrastructure, hydrogen infrastructure and green transport corridors — into road networks, combined with the application of low-carbon technologies in the construction and maintenance of tunnels, bridges and other infrastructure, offers a significant opportunity to reduce emissions, meeting growing regulatory and societal demands, and tapping into new sources of revenue through access to green financing, increased project demand and enhanced attractiveness to investors.	Opportunity	Short term
E1. Climate change	Energy	Rising energy costs, influenced by factors such as availability, taxes and market fluctuations, could significantly impact operating expenses.	Risk	Short term

<sup>1</sup> Rising temperatures, flooding and extreme weather events caused by climate change are increasingly threatening critical road infrastructure, including bridges and tunnels. These conditions accelerate deterioration and damage, leading to higher repair and maintenance costs. In addition, they cause operational disruptions, increase insurance premiums and reduce infrastructure availability, ultimately affecting revenue and service reliability. This risk is therefore classified as significant.

## Description of impact

Material impact				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
E1. Climate change	Mitigation of climate change	Contribution to the acceleration of climate change due to the combustion of fossil fuels by construction machinery, transport vehicles and generators used in offices and on-site operations.	Negative Actual	Upstream - Raw Materials/Suppliers  Company Activities  Downstream - Customers/End Users
E1. Climate change	Energy	Electricity consumption for infrastructure and road network activities generates Scope 2 greenhouse gas emissions, increasing demand for fossil fuels and indirectly contributing to atmospheric degradation and climate change.	Negative Actual	Upstream - Raw Materials/Suppliers  Company Activities  Downstream - Customers/End Users
E1. Climate change	Energy	High energy consumption during production activities contributes to greenhouse gas emissions, especially when fossil fuels are a significant part of the energy mix.	Negative Actual	Upstream - Raw Materials/Suppliers  Company Activities  Downstream - Customers/End Users
E1. Climate change	Energy	Road infrastructure construction generates significant Scope 3 greenhouse gas emissions throughout the supply chain, contributing to climate change and the depletion of natural resources associated with construction activities.	Negative Actual	Upstream - Raw Materials/Suppliers  Company Activities  Downstream - Customers/End Users

## POLICIES

**A**egean Motorway has developed and implemented a comprehensive framework of policies and management systems aimed at addressing climate change and promoting sustainable environmental practices. Specific guidelines and internationally

recognised standards ensure compliance with applicable legislation and the integration of practices that contribute to environmental protection, social responsibility and energy efficiency.

## Environmental management system: EN ISO 14001:2015

The Company implements an Environmental Management System in accordance with the EN ISO 14001:2015 standard, with the aim of systematically managing and reducing the negative environmental impacts of its activities. The system facilitates the continuous monitoring of environmental performance, ensuring compliance with relevant legislation and promoting sustainable development.

## Energy management system: EN ISO 50001:2018

In addition, the Company implements an Energy Management System in accordance with the EN ISO 50001:2018 standard, which focuses on improving energy efficiency whilst reducing energy consumption.

This system supports the rational management of energy resources, while enhancing environmental responsibility and economic efficiency.

### ACTIONS

#### Energy consumption reduction programme

As part of the Company's energy efficiency improvement efforts, a programme has been designed and implemented to reduce electricity consumption and, consequently, greenhouse gas emissions through the adoption of new technologies.

Following the completion of LED lighting installation programmes in previous years and with the completion of ongoing programmes and the launch of new ones, the Company has managed to reduce Scope 2 emissions related to electricity consumption by 45% in 2024.

This achievement is the result of several important initiatives, such as the completion of the lighting upgrade on open motorway sections and in tunnels through the adoption of innovative LED technology, the full roll-out of LED lighting at toll stations in 2024, which included the installation of 200 LED lights on the canopies of the Front Toll Stations and 192 LED units on the roofs of all Toll Stations (Frontal and Ramp Toll Stations), replacing older conventional

luminaires, as well as the development and activation of central energy management software to optimise energy use. Along with the completion of the LED programme at the Toll Stations, in 2024, energy savings of 53% were recorded compared to the reference year 2018, when the lighting interventions first began. In addition, the Company is pursuing projects that are in the design or implementation stage, most notably the adoption of alternative energy supply options from renewable sources with the aim of further reducing its carbon footprint.

The energy consumption reduction programme also includes the installation of electric vehicle charging stations at motorist service stations (MSSs) along the motorway, as well as the adoption of alternative energy supply options from renewable sources to reduce the energy footprint.

The following gas types were used to calculate CO<sub>2</sub> emissions: GHGs - CO<sub>2</sub>eq, R407, R410a, R404a, R134a or HFC-134a, HFC-32.

The energy consumption reduction programme is closely linked to the targets set and is expected to continue in the future.

## Central energy management software

The development and installation of the central energy management software was completed and implemented for the first time during the 2023 financial year and continues to this day. This software allows real-time monitoring of a total of 89 electricity consumption points and 22 water supply points from facilities such as tunnels, through integration with the SCADA system – through the installed smart energy consumption meters as regards the open motorway -, through integration with the BMS system as regards building infrastructure - and through the installed

smart water consumption meters as regards the pumping stations. In addition, the programme can manage electricity and water supply accounts. Water consumption from the public water supply networks amounted to 7,445.92 m<sup>3</sup>, and from the boreholes to 534,841 m<sup>3</sup>. The installation of this software will further enhance the monitoring of the Company's electricity and water consumption, preventing potential system malfunctions or failures, thus contributing to additional energy savings.

## Photovoltaic systems






According to the feasibility study based on current legislation, the installation of photovoltaic systems is capable of covering a large percentage of the electricity consumed by the Concessionaire. Following the negative responses from DEDDHE to the construction of new PV parks due to the inability to

support the grid, the purchase of already constructed parks was preferred. In this context, a large part of the agreement was implemented in 2024 with the signing of the relevant documents. The process will continue and be completed in 2025.

## Environmental management<sup>2</sup>

Environmental management has been a top priority for Aegean Motorway since it started its operations. In this context, in 2009, the Company decided to certify its environmental management system with the main objective of continuously improving its

environmental performance. The scope of application refers to the Operation and Maintenance of the motorway and covers all of the Company's activities as listed below:

-  Separation of waste at source
-  Collection and disposal of waste to licensed management bodies
-  Storage in specially designed areas
-  Sewage collection tanks and biological treatment plant operation
-  Raising employee awareness

<sup>2</sup> Environmental management covers various sustainability issues, such as pollution, water and the circular economy, regardless of the double materiality analysis.



### Depletion of natural resources from electricity supply

**A**egean Motorway strengthens its energy management through effective strategic upgrades and initiatives related to renewable energy sources. The Company has introduced a centralised energy management software to optimise energy use. In addition, it is considering the development and use of photovoltaic parks as a means of meeting its electricity needs. The lighting infrastructure has been upgraded with the installation of 200 LED luminaires

in the funnels of the Front Toll Stations, replacing the old conventional types, and 192 LED luminaires in the canopies of all Toll Stations, both Frontal and Ramp Toll Stations, replacing the old conventional types.

Lighting management software is used to further improve energy efficiency and lighting settings, such as the ability to adjust the intensity (dimming).

### Depletion of natural resources from fuel supply

**T**he Company is committed to reducing its environmental impact through strategic choices, vehicles and emissions management. Aegean Motorway takes significant measures to reduce its carbon footprint by using Euro5 cars, which meet strict emission standards. It actively calculates and

monitors CO2 emissions to ensure compliance with environmental regulatory requirements. In addition, the procurement of plug-in hybrid vehicles demonstrates the Company's commitment to adopting cleaner and more sustainable transportation options.

## Motorway Landscaping

The maintenance work carried out by the Aegean Motorway Maintenance Department also includes landscaping work, which involves planting, tending

and watering along the motorway. During 2024, **the following landscaping works were carried out on the motorway:**

## Irrigation Control

During the reporting year, continuous monitoring and repair of faults and damage to the irrigation network in geographical sections 1 to 26 was carried out.

## Grass cutting Branch cutting

Work was carried out on the right shoulder and central reservation, in car parks, at junctions and other motorway facilities in geographical sections 1 to 26. Extensive branch cutting and grass cutting was also carried out in the Tembi Valley, in the area of Rapsani Train Station in geographical section 26 and along the side roads at the boundary of the fence in geographical sections 1 to 26.

## Tree cutting

Targeted cutting of dry conifers due to pine wilt disease was carried out in the wider area of the Aerino junction.

## Green space maintenance/ pruning in accordance with Government Gazette B/3475/24.5.2023

Work was carried out on the right shoulder and the central median, in parking areas, at interchanges, and in other motorway facilities across geographical sections 1–26. Additionally, extensive branch cutting and grass mowing were performed in the Tempi Valley, in the area of the Rapsani railway station (S.S. Rapsanis) in geographical section 26, and along the service roads at the fence boundary within geographical sections 1–26.

## Replacement

Replacement of pipes, water meters, taps, etc. and repair of pumps in geographical areas 1 to 26.

## Restoration of burned plants

Due to fires in neighbouring areas of the motorway during the summer, damage to the motorway's vegetation and plants was recorded. The damage was recorded on both sides of the motorway from kilometre 285 to 377, with a total length of 12.5 km affected. Specifically, the damage was recorded over a total area of 137,607 m<sup>2</sup>, within which 2,337 trees and shrubs were burned.

With the aim of maintaining the existing vegetation and plants along the motorway, Aegean Motorway proceeded in 2023 to commission a phytotechnical study and subcontract the vegetation and plants of new species based on the study.

The phytotechnical study took three key factors into account:

- the aesthetic adaptation and integration of the road project into the natural environment and the topological characteristics of the area,
- the selection of non-flammable plant species, i.e. species that can create natural fire protection,
- the selection of plant species with low irrigation requirements and resistance to motorway conditions (passing vehicles, atmospheric pollution).

The project to replace plants damaged by the fires was completed in 2024.

## Monitoring the natural restoration of vegetation in the Tembi Valley and Neos Panteleimonas areas

In compliance with Environmental Term 3.3 of Joint Ministerial Decision No. 120770/20-01-2010, Aegean Motorway is preparing the Annual Study for the Assessment of the Natural Restoration of Vegetation in the areas of the Tembi Valley and Neos Panteleimon in the Municipality of Kato Olympos in the Prefecture of Pieria.

The Study covers a summary assessment of the environmental impact and the degree of effect on the flora of the areas from the works carried out twice a year with the aim of stabilising the rock masses of the slopes in these specific locations.

For the 14th consecutive year, an assessment of the natural condition of the vegetation in these areas was carried out by an external partner with the support of the Company's specialist agronomist. The results were included in the Study prepared for the period from May 2023 to June 2024, which was submitted in July 2024 to the Ministry of Environment & Energy, Directorate-General for Environmental Policy, Environmental Licensing Directorate.

According to the study, the overall picture of the flora throughout the GR 140005 area is considered to be entirely satisfactory in terms of both species populations and distribution across habitats.

## Monitoring of Birdlife in Special Protection Areas

In 2023, Aegean Motorway, in collaboration with specialist scientific staff, launched a programme to monitor birdlife in SPAs. Specifically, in order to implement the programme, in August 2023 a field survey of bird species was launched for the SPA protection areas, as well as a check for the existence of habitat types that may be affected by the existing project for the SAC protection areas.

In October 2024, the study of the Environmental Monitoring Programme for Bird Species in Special Protection Areas GR1420005, GR1420007, GR1420011, GR1420015, GR1220010, for the period August 2023 – August 2024. The programme recorded the status of birdlife in the area affected by the motorway, as defined (500 m on either side of the axis), with a focus on the protected areas that

the motorway axis crosses or borders (GR1420005, GR1420007, GR1420011, GR1420015, GR1220010). The purpose of recording and analysing the findings was to assess the potential impact of the motorway's operation on the integrity of bird habitats and, in particular, the endangered species that live in them, on the population of species, but also on critical parameters (nesting, feeding, reproduction and wintering), possible changes in biorhythms due to noise, air pollution, night lighting, etc.

According to the conclusions of the study and the on-site recording of species carried out in the Field Research Area for the calendar year 2023-2024, it is estimated that there is a need to investigate in depth over time which measures are necessary to implement.

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In the coming years, systematic monitoring of the protected areas should be carried out, with the aim of replicating the results for better decision-making on possible countermeasures.

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In this context, a Bird Monitoring Programme (2024-2025) is planned for the next calendar year, using the same methods as before, with additional approaches to be added if necessary.

This will enable an initial comparison of the results for the years 2023–2024 and 2024–2025 and allow for the adoption of a more specialised approach.

## MEASUREMENTS AND OBJECTIVES

### Targets

Aegean Motorway is committed to setting emission reduction targets through a holistic approach, taking into account market trends, infrastructure demand forecasts and evolving transport preferences under various transition scenarios.

The accelerated adoption of sustainable mobility solutions, such as electric vehicles, alongside the integration of renewable energy sources into infrastructure projects, are key factors. At the same time, technological advances in construction methods and materials, as well as new climate policies and carbon pricing mechanisms, will

inform the target-setting process. Engagement with investors, regulators, customers, employees, other concessionaires and local communities ensures that internal targets and external expectations for sustainable development are aligned.

These targets are based on scientifically substantiated data and aligned with internationally recognised frameworks, such as the Paris Agreement and the United Nations Sustainable Development Goals, to effectively manage material impacts, risks and opportunities related to climate.

### Energy consumption and mix

Total energy consumption	Unit	2024
Total electrical energy consumption	MWh	14,406
Percentage of renewable energy sources in total energy consumption	%	18.66
Percentage of fossil fuels in total energy consumption	%	81.34

Type of fossil fuel	Unit	2024
Total energy consumption from fossil fuels	MWh	15,756

Type of renewable energy	Unit	2024
Total energy consumption from renewable sources	MWh	3,600.2
Electricity consumption from renewable sources (excluding renewable electricity generated by the Company)	MWh	3,600.2
Heating, cooling or steam purchased and consumed from renewable sources (excluding renewable electricity produced by the Company)	MWh	0

Intensities and revenues	Unit	2024
Greenhouse gas intensity by location (total greenhouse gas emissions per net revenue)	Value	4,243.8
Net revenues used to calculate greenhouse gas intensity	Millions of euros	102,508,447.69

## Scope 1, 2, 3 emissions and total greenhouse gas emissions

Scope 1, scope 2, scope 3	Unit	2024
Total emissions (Scope 2 based on location)	t CO <sub>2</sub> eq	5,307
Total Scope 1 emissions	t CO <sub>2</sub> eq	1,188
Total electricity emissions by location (network average)	t CO <sub>2</sub> eq	5,307
Total Scope 3 emissions	tCO <sub>2</sub> e	428,532
Percentage of conventional means of transport Scope 2 greenhouse gas emissions	-	0

## METHODOLOGIES AND ASSUMPTIONS

### Calculation of Scope 1 & 2 emissions

The Company has implemented a methodology for calculating emissions from its activities, aligned with ISO 14064-1:2018 and the GHG Protocol. The year 2023 has now been established as the base year for monitoring CO<sub>2</sub>e emissions, due to the expansion of emissions calculations to include activities related

to indirect emissions. The following gas types were used to calculate CO<sub>2</sub> emissions: GHGs - CO<sub>2</sub>eq, R407, R410a, R404a, R134a or HFC-134a, HFC-32. The Company's carbon footprint was recorded in accordance with ISO 14064-1:2018 and the GHG Protocol. There are no direct biogenic CO<sub>2</sub> emissions.

### Scope 3 emissions calculation

Scope 3 emissions include the following categories:

- Upstream transmission and distribution: Energy losses that occur during the transmission and distribution of electricity through the electricity system.
- Employee commuting: Daily commuting of staff between home and work, including calculation of kilometres travelled, as well as remote working (teleworking).
- Business travel: Emissions from business travel, including air travel and accommodation.
- Capital goods: Emissions related to the depreciation of the Company's fixed assets.
- Waste disposal: Emissions from the production and disposal of waste resulting from the operation of facilities, motorway maintenance and heavy maintenance activities.
- Use of sold products: Emissions related to the use of the motorway by customers (vehicle kilometres travelled).
- Leased assets: Emissions from the leasing of premises used for the operation of Customer Service Stations.

### Energy calculation

No energy other than electricity is used specifically for heating, cooling or steam. With regard to imported

electricity, the share of nuclear energy in each supplier's energy mix is 1%.





# Pollution

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### Identification of impacts, risks and opportunities

**A**egean Motorway recognises the significant environmental impacts that pollution – including air, water and soil contamination – can have on ecosystems and human health.

To address these challenges, the Company has established a systematic approach to identifying and assessing pollution-related risks and opportunities across all of its activities and value chain. Key areas of focus include air pollution from emissions, water pollution from runoff and waste disposal, and soil contamination from hazardous waste.

This process is guided by a dual materiality approach, which assesses both environmental and economic impact. Stakeholder engagement and benchmarking against best practices further support the Company's efforts to mitigate pollution and improve sustainability.

In addition, Aegean Motorway collaborates with local media to inform the public about its activities, environmental initiatives and community engagement efforts.

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The Company ensures that its communication with local media is clear, accurate and timely, thereby contributing to a well-informed public and strengthening trust between the Company and the communities in which it operates.

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## Description of the material effects resulting from the materiality assessment

### Description of risks and opportunities

Material risks and opportunities				
Section	Subsection	Description	Characterisation	Time horizon
E2. Pollution	Air, water and soil pollution	Strengthening pollution controls helps reduce potential liabilities and remediation costs, prevents fines and improves operational efficiency, leading to increased profitability overall.	Opportunity	Short term

### Description of impacts

Material impacts				
Section	Subsection	Description of impact	Characterisation	Time horizon
E2. Pollution	Microplastics	Plastic components in building materials can degrade into microplastics, leading to increased toxicity, which results in damage to the ecosystem, harm to organisms and pollution of natural resources.	Negative Actual	Upstream - Raw Materials/ Suppliers Company Activities  Downstream - Customers/End Users
E2. Pollution	Air, water and soil pollution	Construction work significantly affects air quality by releasing substances such as NO <sub>x</sub> , SO <sub>x</sub> and possibly ozone-depleting compounds, leading to atmospheric pollution from emissions unrelated to greenhouse gases and harming human health and the environment.	Negative Actual	Upstream - Raw Materials/ Suppliers Company Activities  Downstream - Customers/End Users
E2. Pollution	Air, water and soil pollution	Heavy maintenance work, such as asphalt application, emits volatile organic compounds (VOCs), particulate matter and carbon dioxide, contributing to local atmospheric pollution and greenhouse gas emissions.	Negative Actual	Upstream - Raw Materials/ Suppliers Company Activities  Downstream - Customers/End Users

Material impacts				
Section	Subsection	Description of impact	Characterisation	Time horizon
E2. Pollution	Air, water and soil pollution	Emissions from product transport, both by freight vehicles and shipping activities (downstream value chain), contribute to atmospheric pollution and greenhouse gas emissions.	Negative Actual	Upstream - Raw Materials/ Suppliers Company Activities
E2. Pollution	Substances of concern/ Substances of very high concern	Heavy metals contained in concrete, steel, asphalt, additives and other materials in the upstream part of the value chain, particularly those used in the construction and maintenance of road infrastructure, do not degrade easily and can remain in the environment for decades, causing long-term impacts on ecosystems.	Negative Actual	Upstream - Raw Materials/ Suppliers Company Activities  Downstream - Customers/End Users

## POLICIES

### Air Pollution Management

Aegean Motorway has implemented a comprehensive air pollution monitoring process in compliance with environmental regulations and requirements. In 2017, the Department of Civil Engineering of the University of Thessaly was commissioned to prepare six-monthly reports on the air pollutant monitoring programme.

This programme includes regular measurements, based on an approved programme, using a fully equipped mobile station.

The data collected is used to evaluate the results of air quality measurements.

The air quality monitoring methodology has been updated to comply with the amended environmental conditions set out in the decisions of the Ministry of Environment and Energy (YPEN), which govern the air pollution monitoring programme along sections of the motorway.

Through this systematic approach, Aegean Motorway ensures continuous monitoring of air pollution levels and compliance with environmental regulations, whilst also contributing to the improvement of the air quality along the motorway by taking action in the event of limit values being exceeded.

## ACTIONS

### Annual environmental impact assessment of Aegean Motorway: Monitoring and management of air pollution

The Company's Integrated Management Department – Environment Division is responsible for overseeing the timely execution and submission of the Annual Environmental Studies for 2024. These studies are crucial for assessing the environmental impact of the Company's activities, focusing in particular on air pollution from motorway emissions and other related environmental aspects.

The environmental studies are conducted annually and provide key data on emissions and pollutant levels, helping to identify and manage potential environmental risks in a timely manner. The findings of these reports are incorporated into the Company's environmental management practices, supporting efforts to reduce pollution and improve overall environmental performance.

The programme for monitoring atmospheric pollutants along the motorway was launched in 2017 with the installation of four permanent monitoring stations

in areas specified by the Environmental Terms. The optimisation of the measurement methodology led to a modification of the network, which operated with one permanent station in the Katerini area - above the tunnel - and one mobile station that takes measurements in the areas of M. Monastiri, Platamonas and Makrygialos, in accordance with Annex 1 of Community Directive 2008/50/EC.

From 10/5/2023, the mobile station also replaced the permanent station in Katerini for the second half of 2023, as this was taken out of service.

The mobile monitoring station takes 24-hour measurements of pollutants, including CO, Nox/NO<sub>2</sub>, O<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and VOCs, during four fortnightly monitoring periods throughout the year, ensuring that all significant seasonal variations are represented.

**The evaluation of the findings of the air pollution monitoring programme for 2024 leads to the following conclusions:**

With regard to air quality indicators, no exceedances were recorded at any location and for any pollutant, with the sole exception of the ozone (O<sub>3</sub>) indicator. A limited exceedance of this indicator was observed mainly during August 2024, based on measurements from the Katerini and Platamonas stations.



At the same time, Aegean Motorway implements a series of complementary actions aimed at effectively preventing and mitigating the effects of pollution in all its activities and value chain.

These actions are meant to make sure we're following environmental rules, protecting natural resources, and always getting better at how we do things for the environment.

Key actions include:

## Construction and upgrading of runoff retention and treatment infrastructure

Installation of runoff retention tanks near sensitive water bodies and upgrading of existing facilities to hydrocarbon separators to prevent contamination of surface and groundwater.

## Monitoring of runoff quality

Regular measurement and analysis of motorway runoff quality in sensitive water bodies to ensure compliance with environmental standards and protect aquatic ecosystems.

## Inspection of drainage systems

Periodic inspections to verify the proper operation and maintenance of wastewater collection and treatment systems at all Company facilities.

## Employee training and awareness

Ongoing employee training and awareness initiatives focused on pollution prevention, spill response and good environmental practices.

## Strategic noise mapping

Conducting a comprehensive noise mapping study along the motorway every five years to identify sensitive areas and determine appropriate mitigation measures.

## Remediation and clean-up activities

Carrying out immediate remediation and decontamination actions in the event of accidents or spills, in cooperation with specialised contractors and local authorities.

## Upstream value chain assessments:

Aegean Motorway also works closely with contractors and suppliers to ensure that environmental management and pollution control measures are consistently applied throughout its supply chain.

## Aegean Motorway’s strategic plan for environmental responsibility

Since 2024, Aegean Motorway has been proactively addressing the environmental impact of its construction activities by involving subcontractors in its sustainability efforts and incorporating environmental criteria into contractual agreements. Recognising that construction activities carried out

mainly by subcontractors contribute to Scope 3 greenhouse gas emissions and that there is currently no process in place to assess these impacts, the Company has developed a strategic plan that it intends to implement in two phases:

**1** Consultation with main subcontractors to prepare and submit reports with detailed information on the environmental footprint of each project they undertake.

**2** Incorporating environmental criteria into contracts with subcontractors and suppliers, with a particular focus on the technical specifications of the materials used.

### MEASUREMENTS AND TARGETS

#### Air, water and soil pollution

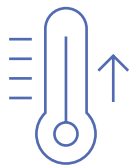
The results of the 2024 air pollution monitoring programme show that there were no exceedances of any air quality index at any of the monitoring stations, except for the O3 (ozone) index. The isolated exceedance of this indicator was recorded

in the majority of measurements during the second half of August 2024, particularly at the Katerini and Platamonas stations.

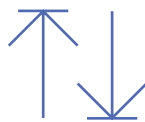
**The high levels of O3 concentration are mainly attributed to:**



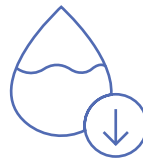
Intense solar radiation



High maximum temperatures



Significant temperature differences between daily minimum and maximum values



Low humidity levels



Low wind speed

### INCIDENT MANAGEMENT AND RECOVERY

During 2024, Aegean Motorway recorded two pollution incidents caused by fires in trailers carrying electric bicycles and mopeds while parked along the motorway. The Company immediately activated its emergency environmental response procedures to limit the impact and proceed to

rehabilitation of the motorway. Aegean Motorway assumed full responsibility for the decontamination process, covering the cost of removing the pollutants and collecting and transporting the hazardous waste by a certified and licensed waste management operator.



# Resource use and the circular economy

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### Identification of impacts, risks and opportunities

**A**egean Motorway is committed to integrating the principles of the circular economy into all its activities, maximising resource efficiency, promoting the reuse of materials and prioritising sustainable raw materials in line with international standards. For the effective resource management and reduction of environmental impact, the Company has established procedures to identify and assess the significant impacts, risks and opportunities associated with its activities.

This includes a targeted focus on resource inputs and outputs and waste management, based on established methodologies. The double materiality

assessment further supports the identification of actual and potential impacts on both the Company's activities and its wider value chain, upstream and downstream.

The Company engages in ongoing cooperation and consultation with affected communities to strengthen its environmental and social strategies. It maintains timely and transparent communication through tailored channels that reflect the specific interests of stakeholders. In particular, ongoing and meaningful dialogue with social partners and local communities helps to integrate their environmental concerns into the Company's decision-making.

## Description of the material impacts resulting from the double materiality assessment

### Description of risks and opportunities

Material risks and opportunities				
Section	Subsection	Description	Characterisation	Time horizon
E5. Resource use and circular economy	Product and Service-Related Waste/ Resource Outputs	The Company promotes a culture of environmental responsibility by encouraging recycling, improving waste separation at source and raising environmental awareness among its employees and partners. These efforts contribute to long-term waste reduction and the adoption of sustainable operating practices.	Opportunity	Medium term

### Description of impacts

Material impacts				
ESRS section	ESRS sub-section	Description of impact	Characterisation	Position in the value chain
E5. Resource use and circular economy	Waste/ Resource Outputs Related to Products and Services	The consumption of natural resources, including materials and fuels, contributes to environmental degradation through increased waste generation.	Negative Actual	Upstream - Raw Materials/ Suppliers Company Activities

## POLICIES

### Waste management

**A**egean Motorway, in compliance with waste management legislation and Joint Ministerial Decision No. 43942/4026 on the organisation and operation of the Electronic Waste Register (EMA), (as amended by Joint Ministerial Decision No. 1/1/2017 and Joint Ministerial Decision No. 26303/1483), has implemented a structured process for managing the waste generated by its activities.

Although the Company does not have a formal sustainability policy on resource use and the circular economy, it strictly complies with waste management legislation and ensures the proper handling of waste through a clearly defined process.

This process includes the annual submission of the 2024 waste production report to the electronic waste register of the Ministry of Environment and Energy. The report provides a detailed account of the total quantities of waste produced, categorised as hazardous and non-hazardous waste, with a clear description of the disposal procedures and the companies responsible for waste treatment.

The scope of the procedure covers all of the Company's activities, specifically the operation and maintenance of the motorway, including its upstream and downstream value chain, where feasible.

The Company ensures that waste management activities comply with environmental standards and that responsible waste treatment is promoted throughout the value chain. In addition, the Company's approach is aligned with applicable environmental legislation, contributing to the minimisation of environmental impacts.

The waste management process is monitored on an ongoing basis to ensure compliance with national and international standards. The Environment Department coordinates and monitors waste management processes related to the activities of Aegean Motorway.

This includes communicating with waste management companies, scheduling the collection of materials and ensuring compliance with environmental regulations.

The Department plays a key role in overseeing the proper handling, disposal and recycling of waste produced by the Company, ensuring that all processes are carried out efficiently and sustainably.

As part of its commitment to sustainability, Aegean Motorway also focuses on maintaining communication with key stakeholders, including affected communities and regulatory bodies.

## ACTIONS

### Sustainable practices for resource management

Starting in 2024, the Company has launched a comprehensive initiative to implement sustainable resource management practices.

This includes adopting strategies and technologies aimed at reducing environmental impact, optimising

resource use and promoting long-term ecological balance. The following initiatives will continue into the future. By incorporating these practices into its activities, the Company demonstrates its commitment to sustainability and responsible management of natural resources.

### Depletion of natural resources from the supply of materials/equipment

Aegean Motorway is committed to sustainability and regulatory compliance by selecting products that meet specific environmental standards. For this reason, it chooses, where possible, approved

products that are energy efficient and sustainable in accordance with measures related to eco-design, energy labelling and tyre labelling, as issued by the European Commission.

### Electronic Waste Register (HMA)

In accordance with the legislation on waste management and Joint Ministerial Decision No. 43942/4026 on the Organisation and Operation of the Electronic Waste Register (EMA), (as amended by Joint Ministerial Decision No. 1/1/2017 and Joint Ministerial Decision No. 26303/1483), Aegean Motorway has

submitted its Annual Waste Producer Report for the year 2024 to the Electronic Waste Register of the Ministry of Environment and Energy. The report details all the quantities of waste disposed of by the Company and the companies that managed them.

### CIGARETTE BUTT COLLECTION AND RECYCLING PROGRAMME

Since August 2022, Aegean Motorway has installed special cigarette butt collection bins at its facilities in Moschochori and Leptokarya. This initiative is part of the Company's commitment to environmental

sustainability through a unique and innovative cigarette butt collection, management and recycling programme developed by Cigaret Cycle AMKE.

By participating in this programme, Aegean Motorway contributes to raising awareness among its employees about the environmental and health risks associated with cigarette butts.

Since cigarette butts are not biodegradable and can remain in the environment for over 15 years, they re-enter the food chain, posing a threat to biodiversity. Through this programme, Aegean Motorway aims to prevent further environmental pollution and promote responsible waste management practices. Furthermore, thanks to the recycling methods

used, cigarette butts are converted into useful, environmentally friendly materials, such as fertiliser for use in floriculture and forms of industrial plastic for everyday use. In 2024, 24.8 kg of cigarette butts were collected from the two special recycling bins between 1 January 2024 and 31 December 2024.

Recycling this amount of waste will produce 5.5 kg of fertiliser, 17.3 kg of industrial plastic raw material, while sending the waste for recycling instead of disposing of it as ordinary municipal waste saved 49,600 m<sup>3</sup> of fresh or sea water from pollution.

## MEASUREMENTS AND TARGETS

### Resource inputs

Aegean Motorway uses a range of key materials and assets throughout its operations, from construction to ongoing maintenance, which are vital to the Company's infrastructure development and sustainability goals.

These resources are necessary for the effective execution of projects and maintenance of road infrastructure, while ensuring compliance with environmental and safety regulations.

### Construction materials and inputs:

- **Steel, concrete and iron:** Fundamental materials used in the construction of pavements, structural elements and infrastructure. These materials are selected for their durability and suitability for the specific conditions of the motorway network.
- **Aggregates (gravel, sand), geotextiles:** These are an integral part of the foundation and stability of the infrastructure, providing the necessary support and strength.
- **Asphalt, emulsions and additives:** These are used in road paving, ensuring resistance to environmental factors and wear and tear from traffic.
- **Precast concrete elements, steel beams and structural elements:** These materials are vital for the construction of bridges, overpasses and other vital infrastructure.
- **Pipes, culverts and stormwater management systems:** Essential for effective drainage and water management throughout the motorway network.

### Technological and infrastructure equipment:

- **Road signs, guardrails, bollards and lighting poles:** Essential components for road safety and traffic management systems.
- **Traffic lights, traffic signals and intelligent transport systems (ITS):** Critical to traffic flow and user safety, these systems help manage congestion and provide real-time information.

- **Heavy machinery and equipment:** Includes excavators, asphalt pavers, graders, cranes, road rollers and drilling equipment, all necessary for motorway construction, repair and maintenance.
- **Surveying equipment, sensors and geotechnical testing tools:** These tools support the collection and analysis of data necessary for the design and monitoring of construction projects.

#### Health, safety and site management materials:

- **Personal protective equipment (PPE):** Essential for the safety and protection of workers in all phases of construction and maintenance activities.
- **Temporary roadblocks, cones and scaffolding:** Used to ensure the safety of workers and road users, facilitating the construction and maintenance process while minimising risks.
- **Site offices and sanitary facilities:** Essential for operational efficiency and the well-being of workers on construction sites.

#### Environmental monitoring and control systems:

- **Air, water and noise monitoring systems:** Used to monitor environmental impacts, ensuring compliance with relevant environmental standards and identifying areas for improvement in pollution control.
- **Digital and administrative tools**
- **BIM (Building Information Modelling), GIS and project management systems:** These digital tools help to manage projects effectively, improving coordination, accuracy and project delivery schedules.
- **Geotechnical and surveying equipment:** Used for environmental impact surveys, measurements and assessments, which provide information for construction and maintenance strategies.

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In addition to these materials and equipment, the Company uses water in various operations, such as water supply, irrigation and other maintenance work, ensuring that its activities are carried out in an environmentally responsible manner.

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## Resource outflows

Description	Unit	2024
Total waste generated	t	10,308
Total waste not recycled	t	135
Total hazardous waste produced	t	28.5
Hazardous waste destined for incineration	t	0
Hazardous waste sent to landfill sites	t	0.69
Total hazardous waste sent for disposal	<b>t</b>	<b>0.69</b>
Non-hazardous waste sent for incineration	t	0
Non-hazardous waste sent to landfill sites	t	134.36
Total non-hazardous waste sent for disposal	<b>t</b>	<b>134.36</b>
Hazardous waste for recycling	t	27.79
Hazardous waste diverted from disposal through other recovery processes	t	0
Total amount of hazardous waste diverted from disposal	<b>t</b>	<b>27.79</b>
Non-hazardous waste prepared for reuse	t	0
Non-hazardous waste for recycling	t	9,789.68
Non-hazardous waste diverted from disposal through other recovery operations	t	355.85
Total amount of non-hazardous waste diverted from disposal	<b>t</b>	<b>10,145.53</b>



# Own workforce

## STRATEGY

### **Material impacts, risks and opportunities and their interaction with the strategy and business model**

At Aegean Motorway, the commitment to sustainability includes the well-being and development of its workforce.

The Company supports its employees through fair, safe and growth-oriented policies. The Company's strategy and business model ensure equal opportunities and remuneration, prohibit all forms of discrimination as well as forced or child labour, and promote diversity by integrating employees with disabilities.

The Code of Conduct for staff and the Health and Safety Management Framework of Aegean Motorway

apply to all employees, contractors and third-party service providers working on its premises. The Company adopts a holistic approach to sustainable development, incorporating initiatives that promote sustainable practices throughout its value chain.

Aegean Motorway's policies and procedures, which cover occupational health and safety, combating violations and discrimination, and protecting human rights, apply to all departments and activities.

This ensures that all employees and external partners working on its premises are adequately protected and covered by the security measures in place.

The Company employs a diverse mix of staff with different types of contracts: its core workforce includes full-time managers, engineers, economists and legal, specialised and general office staff, technical staff, toll collectors, as well as labourers, drivers and cleaning staff, employed on permanent and fixed-term contracts.

Aegean Motorway does not use on-call contracts. For seasonal or specialised work, such as snow removal and technical projects, the Company works with suitable subcontractors. Aegean Motorway

recognises the potential negative effects of long working hours in demanding sectors, such as road infrastructure, which can adversely affect employee well-being through increased stress, fatigue and reduced concentration.

This is a systemic issue that is widely recognised in the industry and in the areas where the Company operates. Through relevant actions and policies, Aegean Motorway strives to ensure the proper management of working hours and the protection of employee well-being.

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**Aegean Motorway has achieved significant positive results for its human resources through initiatives that promote financial security, well-being and safety in the workplace.**

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These include collective agreements offering enhanced pension and healthcare benefits, as well as support measures such as a blood bank, monthly meal vouchers and special leave policies to improve work-life balance. The Company also implements a comprehensive health and safety management system, along with strict data protection practices in accordance with Law 4624/2019 (GDPR).

These efforts primarily benefit administrative, technical, and operational staff, while certain measures are extended to contractors and service providers.

The Company sees key opportunities in the proactive wellbeing of its workforce and risk management. Preventing harassment creates a safer, more inclusive environment, improving morale and reducing legal risks and staff turnover. Comprehensive medical programmes reduce absenteeism and healthcare costs while enhancing performance. Implementing a health and safety system at work reduces accidents, medical claims and insurance costs, supporting a stable and productive workforce. Aegean Motorway does not participate in activities that are considered to involve a significant risk of forced or compulsory labour.

The Company is certified to:

**ISO 39001:2012**

(Road Safety Management System)

**SA 8000**

(Social Responsibility)

**OHSAS 18001:2007**

(Occupational Health and Safety)

certifications, demonstrating its commitment to ethical labour practices.

Furthermore, it does not operate in areas or engage in activities that are considered to pose a significant risk of child labour. The Company's activities are conducted in accordance with Greek labour law, which prohibits the employment of children under the age of 15.

## EMPLOYEE GROUPS THAT COULD BE NEGATIVELY AFFECTED

The Health, Safety and Social Responsibility Committee of Aegean Motorway plays a critical role in identifying and addressing risks to the workforce by maintaining close and ongoing dialogue with all departments. Through regular meetings and structured feedback sessions, the Committee collects first-hand information from employees about

incidents, near misses and operational challenges in critical areas. This feedback mechanism allows the team to understand any particular characteristics or conditions, such as night shifts, high-traffic areas or the use of heavy machinery, that contribute to employee stress, fatigue or accidents.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### Description of the material impacts resulting from the materiality assessment

Aegean Motorway has established robust processes for the effective management of its workforce, systematically identifying and assessing

the key impacts, risks and opportunities arising from its activities. All IROs related to the Company's workforce are described below.



## Description of risks and opportunities

Material risks and opportunities				
Section	Subsection	Description	Characterisation	Time horizon
S1. Equal workforce	S1. Equal treatment and opportunities for all	By proactively preventing harassment, we create a safe and inclusive environment for vulnerable and underrepresented individuals. This commitment enhances employee well-being and corporate culture, whilst also reducing costs associated with legal liabilities, employee turnover and low productivity levels.	Opportunity	Short term
S1. Own workforce	S1. Working conditions	Comprehensive medical programmes can lead to financial opportunities by reducing absenteeism and healthcare costs, increasing employee productivity and improving overall morale, thereby enhancing organisational performance.	Opportunity	Short term
S1. Same workforce	S1. Working conditions	Implementing effective health and safety risk management can lead to fewer workplace accidents, reducing related costs such as medical expenses, legal fees and insurance.	Opportunity	Short term

## Description of impacts

Material impacts				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
S1. Own workforce	S1. Working conditions	Extended working hours can significantly affect the well-being of workers in demanding sectors such as road construction and infrastructure, where shifts are often long and the work is physically and mentally exhausting. This can lead to increased stress and fatigue, reduced mental alertness, and highlights the importance of managing working hours while providing adequate support to workers.	Negative Potential	Company Activities

Material impacts				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
S1. Own workforce	S1. Working conditions	Collective agreements provide employees with strong pension and health benefits, contributing to their financial security and well-being.	Positive Actual	Company activities
S1. Own workforce	S1. Working conditions	The Code of Conduct opposes behaviour related to exploitation or sexual abuse and creates a respectful and safe workplace where the dignity of every employee is protected.	Positive Actual	Company Activities
S1. Own workforce	S1. Working conditions	Implementation of employee benefits that enhance well-being and promote work-life balance, such as a blood bank for medical emergencies, monthly meal vouchers to support nutrition, and special leave to cover personal and family needs.	Positive Actual	Company Activities
S1. Own workforce	S1. Working conditions	The Company has established a Health and Safety Management System to address work-related injuries and life-altering incidents. This system is designed to protect the health and safety of employees by ensuring a safe and supportive working environment.	Positive Actual	Company Activities
S1. Own workforce	S1. Other labour-related rights	The Company respects privacy by adopting personal protection measures in accordance with Law 4624/2019 (GDPR), strengthening the protection of the Company and personal data. This commitment also enhances the sense of security and protection among employees.	Positive Actual	Company Activities

## Policies regarding Human Resources

At Aegean Motorway, employee-related policies form the backbone of its operations, ensuring a structured, ethical and effective working environment. This set of policies is designed to promote a safe and supportive atmosphere, with the aim of enhancing the well-being and satisfaction of its workforce and serving as a preventive framework. By promoting a culture of respect, open communication and continuous development, the Company strives to create a workplace where employees feel valued, safe and motivated to give their best.

The Employee Code of Conduct and Internal Work Regulations play a central role in this context, supporting standards of ethics, conflict of interest safeguards and anti-bribery measures, which are complemented by the Policy on Combating Violence

and Harassment in the Workplace, ensuring a non-discriminatory and respectful workplace with formal reporting and response procedures. An occupational health and safety management system (ISO 45001-2018) is also in place, which acts as a guarantee for the entire workforce.

The Company implements strong policies against bribery and conflicts of interest, along with a Supplier and Partner Code of Conduct and due diligence protocols to ensure that these ethical standards extend throughout its value chain.

In addition, a structured grievance and complaint mechanism allows employees and third parties to report misconduct confidentially, enhancing accountability and timely risk identification.

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Collectively, these policies reduce risks, legal, reputational damage, staff turnover, loss of productivity and operational disruptions, while creating opportunities to improve employee well-being, retention and productivity, diversity and innovation.

## EMPLOYEE CODE OF CONDUCT

The Aegean Motorway Employee Code of Conduct describes the principles and rules governing employee behaviour, promoting a respectful and professional working environment. It applies to all employees, contractors and third-party service providers involved in its activities.

It also includes explicit expectations regarding compliance with laws prohibiting forced or compulsory labour and child labour. Business partners and their representatives are encouraged to report in good faith any concerns or potential violations related to these issues.

Such reports are handled with strict confidentiality and due diligence. Reporting mechanisms include designated communication channels, such as a dedicated email address and a postal address for confidential submissions addressed to the compliance officer. These provisions collectively serve as preventive measures and monitoring

mechanisms to address risks related to human trafficking, forced labour and child labour in all activities and business relationships.

The Company's senior management, including the Chief Executive Officer and the Human Resources Director, is responsible for implementing the policy, ensuring compliance with ethical standards and legal requirements.

The Code takes into account the interests of various stakeholders, including employees, customers, suppliers and the wider community, to ensure that the policy responds to their concerns and expectations. Employees are informed about the Code during the onboarding process and attend training sessions to understand its principles and their responsibilities under it. In addition, the Company maintains open channels for reporting any concerns or violations related to the Code, reinforcing its commitment to a positive organisational culture.

## HUMAN RIGHTS PROTECTION POLICY

**A**egean Motorway is firmly committed to protecting the human and labour rights of its workforce, in full alignment with the UN Guiding Principles on Business and Human Rights, the ILO Declaration and the OECD Guidelines.

These standards are incorporated into the Company's Human Rights Protection Policy and supported by additional frameworks, such as the UN Global Compact and the Universal Declaration of Human Rights. This alignment is reflected in its policies on non-discrimination, freedom of association, safe working conditions and data protection, and is implemented through clear procedures, training and a confidential complaints mechanism. The Head of the Legal Department is responsible for implementing the policy, while the Chief Executive Officer is responsible

for approving the document. When determining the Company's policies, the interests of key stakeholders are taken into account through regular communication with public authorities, internal dialogue at all employee levels, including through the Corporate and Social Responsibility Committee and continuous monitoring of relevant European and national legislation.

Aegean Motorway ensures that policies are accessible to both potentially affected stakeholders and those responsible for their implementation through multiple internal communication channels, as well as the established complaints mechanism, the regular meetings of the Health, Safety and Social Responsibility Committee, and the publication of meeting minutes.

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The policies are also accessible via the Company's internal network and official website.

Aegean Motorway's Human Rights Protection Policy underlines its commitment to defending fundamental rights and promoting a fair, safe and inclusive working environment. The Company prohibits discrimination on the basis of gender, age, race, origin, disability, religion or sexual orientation, ensuring equal opportunities in recruitment, evaluation and termination of employment.

It maintains a zero-tolerance policy towards child labour, forced labour and modern slavery, both within its own operations and throughout its supply chain.

The Company is committed to providing safe and healthy working conditions through strict health and safety standards, systematic risk assessments and a culture focused on prevention. Employees' rights to privacy are respected, supported by a comprehensive data protection policy. Aegean Motorway ensures compliance with national legislation and international standards, including the Universal Declaration of Human Rights, ILO conventions and the UN Global Compact, reinforcing its commitment to ethical business practices and sustainable development.

Aegean Motorway participates in consultations with both local communities and employees on issues that may affect their environment. In addition, it implements internal codes of conduct and provides

training programmes to foster ethical behaviour, respect and increased awareness of human rights at all levels of the organisation.

Aegean Motorway's Human Rights Protection Policy explicitly addresses and prohibits all forms of human trafficking, forced or compulsory labour and child labour. The Company maintains a zero-tolerance approach to such practices, both within its activities and throughout its value chain.

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The policy ensures that Aegean Motorway takes all necessary measures to prevent direct or indirect involvement in any form of modern slavery, in accordance with international standards and national legislation.

## COMPLAINTS MECHANISM

Aegean Motorway provides an accessible and confidential complaints mechanism, which is available to employees, partners and third parties. Reports of human rights violations can be submitted via a dedicated email address:

[compliance@aegeanmotorway.gr](mailto:compliance@aegeanmotorway.gr)

and all complaints are investigated with due diligence and objectivity. The Company ensures full protection from retaliation for whistleblowers and takes corrective action when necessary, following

established internal procedures. This mechanism is continuously monitored and improved to ensure its effectiveness and maintain the Company's commitment to human rights.

Aegean Motorway has established clear operational procedures, including accident management and the use of Personal Protective Equipment, as well as Occupational Risk Assessment Studies for all employee groups and facilities, and complies with international standards such as **ISO 45001, ISO 31000 and ISO 39001**.

## POLICY ON COMBATING VIOLENCE AND HARASSMENT IN THE WORKPLACE

The Policy for combating violence and harassment in the workplace aims to create and establish a working environment that respects, promotes and ensures human dignity, with zero tolerance for abusive behaviour of any kind, including gender-based violence and harassment and sexual harassment by any person.

Similarly, the human rights protection policy, as described in the previous chapter, provides a comprehensive framework for prohibiting discrimination and explicitly prohibits discrimination on the basis of race, ethnicity, colour, gender, sexual orientation, gender identity, disability, age, religion, political opinion, national origin, social origin and other forms of discrimination covered by Union regulations and national legislation.

The senior level responsible for implementing the policy includes the Chief Executive Officer, the Human Resources Manager and the Legal Department Manager, who collectively oversee and ensure the effective implementation of the policy throughout the organisation.

The senior level responsible for implementing the policy includes the Chief Executive Officer, the Human Resources Manager and the Legal Department Manager, who collectively oversee and ensure the effective implementation of the policy throughout the organisation. When setting policies, Aegean Motorway actively takes into account the interests of key stakeholders through regular communication with public bodies, ongoing internal dialogue at all

employee levels through the Corporate and Social Responsibility Committee, continuous monitoring of European and national legislation, and the organisation of internal workshops in collaboration with relevant industry organisations.

The policy is available to potentially affected stakeholders and those responsible for its implementation through multiple channels. It is accessible via the internal network and the Company's official website, distributed to new employees upon recruitment, and supported by ongoing information and awareness-raising activities and training programmes. In addition, internal communication channels, the Employee Code of Conduct and a grievance mechanism further ensure comprehensive understanding and compliance.

In accordance with the Principles adopted by the Company, all employees are responsible professionals who behave with honesty and integrity, always taking responsibility for their actions.

The Policies, the Code of Conduct, and the Regulations supplement the applicable legislation and are binding on all members of Aegean Motorway, wherever they operate.

Particular emphasis is placed on the development and implementation of internal procedures that focus on promoting channels of communication at all hierarchical levels, without exception, on identifying and addressing issues related to overwork, discrimination, harassment and any interference that undermines the dignity of the employee in any way. In addition, these procedures aim to foster a spirit of teamwork and common goals through specially designed training programmes, as well as to promote social responsibility and contribution through team activities with an environmental and social orientation.

The Company implements its policy to combat violence and harassment in the workplace through a series of specific procedures designed to prevent, address and mitigate such issues. These include

strong internal communication channels, a formal grievance mechanism, and complaint reporting and management procedures, such as anonymous reporting and a clear commitment to non-retaliation.

In addition, the policy is reinforced through ongoing information campaigns and awareness-raising initiatives aimed at promoting diversity and inclusion throughout the organisation.

### **Procedures for cooperation with employees and employee representatives regarding the impact**

**A**egean Motorway actively engages with its workforce through the Health & Safety and Corporate Social Responsibility Committee, which includes employees elected by their colleagues from all facilities and departments of the Operation Division.

The Committee meets regularly every six months with the Company's Management and executives to discuss issues related to Health and Safety at Work and broader corporate social responsibility issues. Aegean Motorway has been certified by an accredited body for the installation and implementation of the SA8000 Social Responsibility Management System.

This certification framework facilitates ongoing cooperation with employee representatives and provides valuable information on the needs and rights of its workforce, ensuring respect for human rights within the organisation.

It also assesses the effectiveness of its cooperation with its workforce through risk assessments carried out as part of the implementation of the SA8000 Social Responsibility System.

**These assessments help identify areas for improvement and ensure that efforts to engage with the workforce are aligned with social responsibility commitments, supporting the continuous improvement of labour relations and related outcomes.**

The Company takes various measures to understand and address the needs of particularly vulnerable employees, such as people with special needs and disabilities. These include assessment of job suitability by the Occupational Physician and,

where necessary, transfer of employees to suitable positions, providing the option of remote working, covering expenses related to significant medical incidents and ensuring continued payroll during serious health problems.

These measures demonstrate Aegean Motorway's commitment to supporting vulnerable groups of employees and responding to their specific needs.

### **PROCEDURES FOR REMEDYING NEGATIVE EFFECTS AND CHANNELS FOR EMPLOYEES TO EXPRESS THEIR CONCERNS**

#### **Internal communication channels with employees**

Aegean Motorway has established an "Open Door" policy for all hierarchical levels and has introduced basic rules for internal corporate communication that do not violate the responsibilities, hierarchical relationships or personality of the employee in question.

The type and transmission of information follows specific rules, which ensure the timely and accurate information of the relevant Company personnel - in this way, a healthy and dignified working environment is ensured and maintained.

Specifically, the Company implements the following internal corporate communication structures:

- Vertical communication structure
- Horizontal cross-departmental communication structures
- Cross-departmental communication structures
- Authorised communication structures

## INTERNAL COMPLAINT MANAGEMENT

Aegean Motorway actively encourages an environment of trust among its employees, customers and suppliers. In this context, it supports the reporting of illegal practices and criminal offences in good faith. In this context, and in parallel with the above communication structures, in order to ensure that staff members can communicate

directly with the relevant departments on issues relating to inappropriate practices and behaviour that violate Aegean Motorway’s policies and regulations, the Company has created two confidential and/or classified communication channels, which are governed by strict rules, in order to:

**1** Ensure compliance with the principle of confidentiality and protection of anonymity (to the extent that this does not conflict with applicable law)

**2** Not to jeopardise the current position or future professional development of the person submitting such reports

These channels accept named and anonymous reports, however, the Company encourages named reports and is committed to strictly adhering to the principles of respect for personality, trust, transparency, dignity, honesty and integrity, and professional conscientiousness and confidentiality in handling such complaints.

The ultimate purpose of these communication channels is the timely identification and handling of deviations relating to the Company’s compliance with its Policies and Regulations and the applicable institutional framework, as well as to safeguard the interests of its staff, shareholders, customers and suppliers.

## INTERNAL COMMUNICATION CHANNELS

Directly with the Human Resources Department for personnel issues via:

- E-mail to the designated e-mail address marked “Confidential”. This is a gmail address that can be used by all staff and is accessible exclusively to the Human Resources Department
- Letter (anonymous), marked “Confidential”
- By telephone, asking for the Human Resources Department

Directly with the Legal Department for complaints related to the Company’s legal/regulatory obligations, such as conflicts of interest, bribery, unauthorised

transactions with public services and/or other state bodies, unacceptable - and in some cases illegal - actions. Communication is possible via:

- E-mail, by sending an e-mail to the designated e-mail address of the Legal Department
- An anonymous or signed letter sent directly to the compliance officer, marked “Strictly confidential”
- Telephone communication, directly with the Legal Department Manager

All reports received through internal channels are recorded, categorised and analysed in order to understand the nature and extent of the issues reported. The relevant indicators are periodically evaluated by senior management, who initiate

appropriate actions when necessary. This monitoring and control process, with the involvement of the intended users, ensures the effectiveness of the channels and that issues are addressed promptly and adequately.

## PROTECTION OF COMPLAINANTS

**A**egean Motorway actively promotes trust in its complaint and reporting mechanisms through comprehensive training, clear communication and strong protection measures.

Employees are informed of the Company's zero-tolerance policy towards violence and harassment through regular seminars and briefings to raise awareness and encourage the reporting of such incidents.

The Company ensures that all employees are aware of the available channels for submitting complaints, including anonymous reports and the procedures for handling them. To protect individuals who use these mechanisms, Aegean Motorway has established policies that ensure protection from retaliation.

**The Company is committed to maintaining confidentiality and not disclosing the identity of the complainant, unless required by law, and to protecting them from any acts of retaliation or discrimination.**

In addition, individuals involved in the investigation process who have a conflict of interest are excluded in order to maintain objectivity.

The Company also cooperates, when required, with the competent public, administrative or judicial authorities, and takes appropriate measures where it is found that its policies have been violated, and adopts, where necessary, measures such as compliance recommendations, changes in job responsibilities and/or termination of employment.

**Through these measures, Aegean Motorway demonstrates its commitment to ensuring a safe and supportive working environment where employees can express their concerns without fear of reprisals.**

## Actions

Aegean Motorway acts decisively to protect and support its workforce through effective preventive measures.

## EMPLOYEE BENEFITS

**I**n addition to its core responsibilities, Aegean Motorway has implemented a series of initiatives with the primary aim of achieving positive effects for its own workforce, with a view to enhancing quality of life, well-being, professional development and work culture.

To support employees in the face of rising living costs, in 2021 the Company began providing a monthly meal allowance card for all staff. In terms of health and protection, since 2011, the Company has offered a comprehensive private group health and life insurance programme, which supplements public health coverage.

This plan includes medical coverage for employees and, optionally, for their family members, life insurance, coverage for permanent total or partial disability due to accident or illness, and access to special offers for medical services through partnerships, such as with IASO Thessaly.

**In addition, employees benefit from preventive health examinations, diagnostic tests and maternity support, including a one-off childbirth allowance. A blood bank has also been set up through regular blood donations by staff in collaboration with the General Hospital of Larissa.**

To address the significant impact of long working hours on the well-being of employees in the demanding road infrastructure sector, Aegean Motorway closely monitors working hours and conducts comprehensive risk assessments for each job position.

These assessments identify fatigue-related risks and guide staff and shift planning to prevent excessive workloads and reduce stress. In line with best practices, such as limiting shift length, ensuring adequate rest periods and integrating fatigue risk management into its operations, the Company proactively ensures mental alertness, reduces stress-induced errors and promotes the overall health and safety of its workforce. Aegean Motorway offers flexible working arrangements and special leave

for employees who are studying, are new parents or have health issues. Employees also regularly participate in social events and celebrations, such as annual gatherings, beach parties, festive events and employee recognition programmes, such as “Employee of the Year”, thus strengthening team spirit and a strong sense of belonging.

In addition, continuous training and development programmes are available to all employees, regardless of hierarchical level, covering topics such as first aid, fire safety, firefighting and road safety. The Company also collaborates with universities, offering internships in both the construction and operations sectors, while actively supporting employees who pursue further studies related to the Company’s operational needs.

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These initiatives demonstrate the Company’s overall commitment to improving employee well-being, enhancing personal and professional development, and fostering a positive, inclusive work culture.

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Aegean Motorway monitors and evaluates the impact of its actions and initiatives on its workforce and identifies the need for action through individual and collective employee interviews. The Company also responds to actual or potential negative impacts on

its workforce through multiple channels, such as the grievance mechanism, the submission of complaints, and the meetings of the Health & Safety and Social Responsibility Committee.





## HEALTH AND SAFETY

The Company has made strategic decisions to strengthen its internal capacity in health and safety matters. Specifically, the Company employs permanent internal staff, including a Safety Officer, to enhance the consistency, quality and immediacy of safety supervision in the workplace. In addition, the Company works on a permanent basis with an external Occupational Physician, employs a full-time Nurse and has two Medical Centres installed at the Operations and Maintenance Centres in Moschochori and Leptokarya.

To ensure the safety of employees, appropriate personal protective equipment is provided to all employees to further minimise risks and create a safer working environment. The Health, Safety and Social Responsibility Committee, which includes management, other responsible positions such as

the safety technician and occupational physician, and employee representatives from all operational facilities, plays a key role in monitoring risks. The Committee meets at least twice a year, or more often when necessary, to discuss safety issues and develop collective actions.

All relevant data is collected by the Integrated Management and Internal Audit Department and managed according to formal approved procedures, fully aligned with international standards ISO 45001 (Occupational Health and Safety Management) and ISO 31000 (Risk Management) standards.

These procedures are subject to continuous review to monitor their effectiveness, enabling the Company to address any shortcomings immediately and reinforce its culture of prevention.

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At the same time, the Company recognises opportunities to enhance employee trust, satisfaction and retention through proactive investments in occupational health and safety infrastructure. By embedding critical safety functions and demonstrating a commitment to transparent, participatory governance on safety issues, the Company reinforces its reputation as a responsible employer.

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Furthermore, empowering employees through their participation in the Health and Safety Committee enables a bottom-up approach to decision-making, improving morale and promoting a safer and more participatory work environment.

These practices contribute not only to risk mitigation, but also to enhancing operational resilience, retaining talent and long-term business sustainability, which are key strategic opportunities for the Company.

Aegean Motorway ensures that its practices do not cause or contribute to any material adverse impacts on its workforce by upholding the principles of equal treatment and meritocracy in recruitment and strictly adhering to its employee data protection policy (GDPR) of employees. Work planning takes into account favourable weather conditions to ensure the well-being of employees, and all employees are provided with appropriate personal protective equipment (PPE). In addition, the Company includes clauses in its contracts with suppliers requiring the implementation of social responsibility systems and enforces a code of conduct for suppliers.

When tensions arise between the prevention of negative impacts and other business pressures, the Company prioritises the health, safety and rights of its workforce, while seeking balanced and responsible solutions.

To effectively manage its material impacts, Aegean Motorway allocates both human and financial resources to various key areas. Operational responsibility lies with the Human Resources Department. The Company operates in accordance with internationally recognised standards, including ISO 45001 and SA8000, to ensure a structured and responsible approach.

Financial resources are allocated to employee training programmes, health and safety measures and the overall well-being of the workforce. To identify and address issues, there is a formal grievance mechanism and complaint management procedures, including anonymous reporting and a no-retaliation policy. In addition, management regularly monitors performance and evaluates the effectiveness of actions taken, ensuring continuous improvement and transparency in addressing material impacts.

## MEASUREMENTS AND TARGETS

### Targets

The main objectives set by Aegean Motorway for the management of material impacts, risks and opportunities related to its workforce are as follows:

- Maintaining and increasing training hours for employee development
- Maintaining a healthy working environment
- Continuation of the horizontal financial support programme for employees
- Elimination of serious workplace accidents

While Aegean Motorway's objectives include health and safety as well as employee welfare and development, the process of setting objectives is more systematically structured around health and safety issues. This process includes regular safety inspections conducted during the implementation of

works, led by the Safety Technician, to identify critical areas for improvement. While the direct involvement of the workforce or employee representatives in setting these objectives is not explicitly described in detail, ongoing training programmes help to align employee performance with these objectives.

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The Company continuously monitors its performance, including assessing market conditions, using this knowledge to identify lessons learned and promote improvements in health and safety practices.

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Total employees



Male employees



Female employees



Employees of other gender



Number of employees in countries with 50 or more employees representing at least 10% of the total number of employees



Permanent employees (men)



Permanent employees (women)



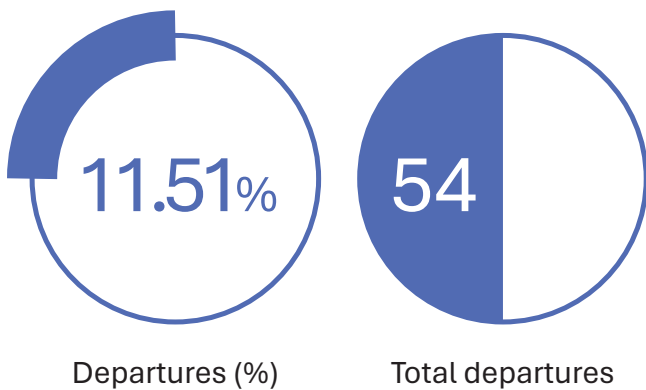
Temporary employees (men)



Temporary employees (women)



Employees without guaranteed working hours



The figures are based on the number of employees and reflect the workforce at the end of the reporting period.

**Characteristics of non-salaried employees in the company’s own workforce**

The Company does not employ persons provided by companies mainly engaged in employment activities.

**Collective bargaining and social dialogue**

In terms of wages, Aegean Motorway offers wages above the limits of collective agreements. The collective agreements in force have been in effect since 2007 and cover 100% of employees, while all

national minimum wage requirements are met. The Company does not employ staff on standby contracts; fixed-term contracts are used to cover seasonal needs.

**Diversity indicators**

Aegean Motorway respects diversity, taking measures to prevent any form of discrimination in the workplace

and in the selection of its employees. It provides equal opportunities to all employees, regardless of gender.

Diversity	Financial year 2024
Number of men in senior management	15
Percentage of men in senior management positions (%)	83.33
Number of women in senior management	3
Percentage of women in senior management (%)	16.66
Distribution of employees (number of staff) under 30 years of age	13
Employees aged <30 (%)	2.79
Distribution of employees (number of staff) between 30 and 50 years old	357
Employees aged 30- (%)	76.45
Distribution of employees (number of staff) over 50 years old	97
Employees aged >50 (%)	20.77

The Company defines its highest administrative bodies as the General Assembly, which consists of the four shareholders (HOCHTIEF PPP Solutions GmbH, AVAX CONCESSIONS SINGLE MEMBER SA, AKTOR CONCESSIONS SINGLE MEMBER SA, VINCI CONCESSIONS SAS) and the Board of Directors. The election of members to these supreme administrative bodies is determined by the Company's Articles of Association and by special agreements between the Shareholders drawn up when the Company was established. The Chief Executive Officer has broad powers to represent the Company and exercise the powers of the Executive Board, except for matters

requiring collective action by the Executive Board. This power is exercised jointly with one of the three Executive Directors (Chief Financial Officer, Chief Operating Officer, Chief Technical Officer).

In addition, four executive members of the Board of Directors have relevant delegated powers. Non-executive members of the Board do not play an active role in policy formulation or implementation, but participate in Board meetings, which are usually held every two months, where general issues, including sustainability, are announced and decisions are taken.

## SUFFICIENT SALARIES

Aegean Motorway ensures that all employees receive salaries and benefits that are competitive with the market, exceeding the requirements of Collective Labour Agreements, in order to guarantee the well-being of its workforce and meet the needs of modern families.

It maintains fair and equal pay without gender discrimination, with salaries determined by job specifications and employee qualifications. As a result, all employees are paid an adequate wage in line with current benchmarks, fulfilling the disclosure requirement.

## SOCIAL PROTECTION

Aegean Motorway exceeds legal requirements to promote the social protection and well-being of its entire workforce through a comprehensive benefits package:



**Illness:** All employees participate in the Greek national social security system. In addition, Aegean Motorway offers private group health insurance that covers medical care for employees and their families, as well as access to preventive examinations and medical services through IASO Thessaly.



**Unemployment:** Employees contribute to the national unemployment insurance system through OAED, becoming eligible for benefits once they have completed the required insurance contributions (e.g. approximately 125 days within a 12-month period).



**Work-related injury & disability:** In addition to the compensation provided by the state, the Company's private insurance covers life, permanent total and partial disability resulting from work-related accidents or illnesses.



**Parental leave:** Employees enjoy statutory maternity/paternity leave, which is supported by a one-off childbirth allowance paid through the insurance programme.



**Retirement:** All staff accrue public pension rights through social security, in addition to support through group life and disability insurance.

## People with disabilities

Employment and integration of persons with disabilities	Financial year 2024
Percentage of persons with disabilities among employees, subject to legal restrictions on data collection (%)	1.28

The report on persons with disabilities in the workforce is based on official disability certificates issued by the Disability Certification Centre.

These certificates serve as the main source of data for identifying employees with recognised disabilities.

## TRAINING AND SKILLS DEVELOPMENT INDICATORS

Employee education and training constitute a key pillar of the Company's strategy, enhancing knowledge and added value.

The Company supports partnerships with Universities, internship positions, and the continued studies of its employees, in line with its operational needs.

Training and skills development	Financial year 2024
Male employees who participated in regular performance and career development reviews	237
Female employees who participated in regular performance and career development reviews	150
Other employees who participated in regular performance and career development reviews	0
Percentage of employees who participated in regular performance and professional development reviews (%)	82.34
Average number of training hours per gender (men)	6.31
Average number of training hours per gender (women)	2.01
Average number of training hours per person for employees	4.74

Examples of training programs carried out in 2024 include: ArcGIS Pro 2D & 3D, Artificial Intelligence in Administrative Secretariat & for Administrative

Executives, Level Up Your Excel Skills – Mastering Data & Formulas, and Energy Management Software.

## Health and safety indicators

Health and Safety	Financial year 2024
Percentage of people in its workforce covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines (%)	100
Number of fatalities in its own workforce as a result of work-related injuries and work-related illnesses	0
Number of fatalities resulting from work-related injuries and illnesses of other workers employed at the Company's facilities	0
Number of recorded work-related accidents for its own workforce	4
Percentage of recorded work-related accidents for its own workforce (%)	4.31 <sup>3</sup>
Number of recorded cases of work-related illnesses among employees	0
Number of days lost due to work-related injuries and deaths from work-related accidents, work-related illnesses and deaths from work-related illnesses	17

<sup>3</sup> The "work-related injury rate" is calculated as the number of relevant incidents divided by the total number of hours worked and multiplied by 1,000,000, in accordance with requirement 2.1 of GRI 403-9. The term "rate" is used in the sense of an indicator (rate) per one million working hours and not as a mathematical percentage (%). The calculation applied by the Company is: Frequency Rate = Number of occupational accidents ÷ total hours worked × 1,000,000. Therefore: 4 occupational accidents ÷ 929,003.35 total hours worked × 1,000,000 = 4.305689532766486

## Indicators for work-life balance

Work-life balance	Financial year 2024
Percentage of employees entitled to leave for family reasons (%)	100 <sup>4</sup>
Percentage of eligible employees who took leave for family reasons (%)	46.65
Percentage of eligible employees who took leave for family reasons by gender (men) (%)	27.3
Percentage of eligible employees who took leave for family reasons by gender (women) (%)	80
Percentage of eligible employees who took leave for family reasons by gender (other gender) (%)	0

<sup>4</sup> The percentage of employees entitled to leave for family reasons was calculated based on the total workforce, excluding the four executives, as their employment contracts follow a different framework that does not include standard leave entitlements applicable to the rest of the staff.

All Company employees are entitled to family-related leave in accordance with national labour legislation and the Company's social policy. In addition, Aegean Motorway offers flexible working arrangements,

including reduced working hours and special leave, to support employees who are students, have children or face health issues.



## REMUNERATION INDICATORS (pay gap and total compensation)

Aegean Motorway recognises the broader context of wage inequalities between men and women in Greece based solely on job requirements and

qualifications, ensuring that men and women receive equal pay for equal work.

Gender equality and equal pay for work of equal value	Financial year 2024
Gender pay gap (%)	18
Annual total remuneration index (%)	4.80 <sup>5</sup>

<sup>5</sup> When calculating the annual total remuneration index, the denominator included all employees except the highest-paid individual and the four directors (a total of 462 employees).

The scope of the data covers permanent and fixed-term employees and explicitly excludes subcontractors.

The data is collected by the Human Resources Department using internal personnel management systems and payroll records.

## INCIDENTS, COMPLAINTS AND SERIOUS HUMAN RIGHTS IMPACTS

There have been no complaints regarding human rights violations and incidents of violence, harassment or discrimination in the workplace through internal company channels or to third party authorities.

As a result, there were no fines, penalties or damages awarded as a result of complaints submitted for human rights violations or incidents of discrimination, including violence and harassment.



# Affected communities

## STRATEGY

### Material impacts, risks and opportunities and their interaction with the strategy and business model

**A**egean Motorway recognises that its activities can significantly affect the lives, livelihoods and well-being of communities and residents along its network. The Company contributes to meaningful positive

impacts through a range of activities that support the well-being and development of local communities.

Key examples include:

➤ Job creation and local hiring practices, particularly in disadvantaged areas, which promote income generation, skills development and economic resilience.

➤ Infrastructure upgrades that enhance safety, connectivity and access to emergency services.

➤ Respect for self-determination empowers communities to determine their own social, economic and cultural development, strengthening local governance and promoting sustainable development, guided by the communities themselves in accordance with their needs and values.

These actions primarily benefit communities located along the motorway corridor, where regular company functions are concentrated and where improvements in mobility, safety and economic opportunities have a direct positive impact.

The main negative impacts of the Aegean Motorway come from its construction, operation, and

transport activities as part of its value chain. Limited consultation with the community during construction restricts local participation and disrupts residents' lives.

Transport networks increase noise, air pollution and safety risks, affecting quality of life and public infrastructure.

## TYPES OF AFFECTED COMMUNITIES SUBJECT TO SIGNIFICANT IMPACTS

The DMA of Aegean Motorway covers all affected communities that could be materially affected by its activities and those of its value chain. It is important to note that no material risks have been

identified<sup>6</sup>, so there are no stakeholder groups from the affected communities with specific characteristics that face a significant risk of harm.

The impacts identified mainly concern the Company's own activities and not its upstream or downstream value chain partners, as Aegean Motorway operates in a nationally regulated road infrastructure framework with limited exposure to extractive industries or extensive supply chains.

The types of communities subject to potential material impacts are:

- Communities living or working around the Company's operating sites and infrastructure axis, including those living near motorways, toll stations, tunnels and service areas. These communities may be affected by factors such as noise pollution, traffic-related risks, temporary disruptions from construction work and changes in land use. However, they may benefit from improved access, connectivity and local economic opportunities.
- Communities indirectly affected by logistics or maintenance service providers, particularly in areas where road maintenance activities or the movement of heavy equipment could cause short-term disruption or safety concerns. These impacts are mitigated through operational controls and cooperation with service providers.
- Aegean Motorway's business model does not currently include activities related to raw material extraction or waste processing. Therefore, it does not materially affect communities at either end of the value chain in this context.
- No indigenous communities have been identified as being materially affected by the Company's activities, as Aegean Motorway operates exclusively within Greece, where there are no such populations along its infrastructure network.

<sup>6</sup> Aegean Motorway has not identified any material risks or opportunities arising from the impacts and dependencies on affected communities. Therefore, there are no specific groups of affected communities for which such risks or opportunities apply.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### Description of the material impacts resulting from the materiality assessment

#### Description of impacts

Material impacts				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
S3. Affected communities	S3. Civil and political rights of communities	The creation of local jobs, particularly in underserved areas, can contribute positively to household incomes, skills development and local economic activity.	Positive Actual	Company Activities  Downstream – Customers/End Users
S3. Affected communities	S3. Civil and political rights of communities	The construction or expansion of the sites may proceed without full consultation with the community, potentially limiting local citizens' participation in land use decisions and undermining the procedural rights of local residents. This lack of participation can negatively affect residents' livelihoods, disrupting their daily lives.	Negative Potential	Company Activities  Downstream – Customers/End Users
S3. Affected communities	S3. Economic, social and cultural rights of communities	Regular transport activities related to distribution networks can increase noise, air pollution and road safety risks, degrading quality of life and putting pressure on public infrastructure in affected communities.	Negative Actual	Downstream – Customers/End Users
S3. Affected communities	S3. Economic, social and cultural rights of communities	Infrastructure upgrades often lead to better access to emergency and public services, which enhance safety, increase efficiency and improve overall well-being and livelihoods.	Positive Actual	Company Activities  Downstream – Customers/End Users
S3. Affected communities	S3. Economic, social and cultural rights of communities	Road construction can cause light pollution and noise pollution, which affect the well-being of local residents.	Negative Potential	Company Activities  Downstream – Customers/End Users

Material impacts				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
S3. Affected communities	S3. Economic, social and cultural rights of communities	Construction work often leads to road closures or detours, causing longer travel times, increased costs and frustration for local residents. These disruptions can negatively affect livelihoods.	Negative Actual	Company Activities  Downstream – Customers/End Users
S3. Affected communities	S3. Economic, social and cultural rights of communities	Communities may be forced to relocate or lose land due to construction projects, disrupting their livelihoods.	Negative Potential	Company Activities  Downstream – Customers/End Users
S3. Affected communities	S3. Rights of indigenous peoples	Respect for the principle of self-determination allows communities to actively shape their own social, economic and cultural development. This improves empowerment, strengthens local governance and promotes sustainable, community-led development that is aligned with people's needs and values.	Positive Actual	Downstream – Customers/End Users
S3. Affected communities	S3. Indigenous peoples' rights	Violations of the rights, safety and quality of life of local communities may arise due to the Company's direct activities or projects, including issues such as pollution, safety risks, environmental damage, land pressure and inadequate consultation.	Negative Potential	Company Activities  Downstream – Customers/End Users

## POLICIES

Aegean Motorway recognises that the construction and operation of large infrastructure projects inevitably affect the communities through which they pass. The Company is committed to minimising negative impacts and actively contributing to the well-

being of affected populations. Its policies towards affected communities are based on the principles of transparency, environmental management, road safety and social responsibility.

Through continuous dialogue with stakeholders, targeted support initiatives and proactive environmental and social measures, Aegean Motorway strives to ensure that its presence will bring long-term, shared value to the areas it serves.



## HUMAN RIGHTS PROTECTION POLICY

**A**egean Motorway adopts the Human Rights Protection Policy as the central framework for managing material sustainability issues. This policy governs the Company's approach to managing the material impacts, risks and opportunities associated with all affected communities.

The Legal Department Manager (LGM) is responsible for compliance, proper implementation and review of this policy, while the Chief Executive Officer is responsible for its approval and ratification.

The policy follows international standards, including the UN Guiding Principles, the ILO Declaration and the OECD Guidelines, ensuring ongoing compliance and monitoring.

The Company implements strict procedures to prevent violations that affect communities. To date, no material human rights violations have been reported in the activities or value chain of Aegean Motorway.

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**Any incidents will be addressed immediately through complaint mechanisms and corrective actions in accordance with international standards.**

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The Company engages in effective and ongoing dialogue with affected communities to identify and address social and environmental issues, including potential negative impacts arising from the Project. This commitment promotes transparency, trust and mutual respect between the Company and local stakeholders.

With regard to respect for the human rights of communities and indigenous peoples, while its activities do not directly affect indigenous peoples, Aegean Motorway's policy ensures equal protection and respect for the rights of all affected communities.

The policy supports the fundamental principles of human rights, emphasising the right of communities to participate in decisions that affect their land and livelihoods, thereby strengthening social cohesion and democratic participation.

To facilitate accountability and redress, the Company maintains a secure, confidential grievance mechanism accessible to employees, partners, contractors and third parties, including community members, via a dedicated email address

[compliance@aegeanmotorway.gr](mailto:compliance@aegeanmotorway.gr)

All concerns and complaints reported are treated with due diligence in accordance with established procedures, and appropriate corrective measures are implemented immediately.

The Company also guarantees protection from retaliation for those who report in good faith, thus enabling effective access to corrective measures in accordance with UN guiding principles.

## PROCEDURES FOR ENGAGING WITH AFFECTED COMMUNITIES ON IMPACTS

**A**egean Motorway attaches particular importance to cooperation with affected communities as part of its commitment to managing the actual and potential impacts of its activities. The Company recognises that the needs of local communities are essential to its decision-making and the development of responsible and sustainable practices.

Although the views of affected communities do not directly influence the Company's decisions, Aegean Motorway recognises that its activities can affect the daily life and well-being of local communities. Therefore, it works directly and on a daily basis with affected stakeholders to ensure that actual and potential social and environmental impacts are identified, assessed and addressed in an appropriate manner.

Cooperation with local communities takes place at multiple stages of the Project's life cycle. During the design phase and prior to the commencement of construction works, public consultations are held as part of the Environmental Impact Assessments (EIS), where required by law, with the aim of informing the design and identifying social and environmental concerns at an early stage. During construction, the Company works more frequently with communities to address potential impacts such as noise, dust, road

closures and traffic diversions. During the operational phase, engagement continues through open communication channels that support monitoring, problem solving and continuous improvement of impact mitigation strategies.

The Company maintains ongoing communication with legal representatives or trusted intermediaries on a daily basis, reflecting its commitment to open and transparent dialogue.

This communication takes various forms, such as telephone communication, written correspondence, emails, text messages, information leaflets and the use of special complaint submission forms.

All stakeholders, including affected communities, also have the opportunity to communicate via the Company's website and the Company's official social media accounts. This wide range of communication methods ensures that stakeholders have multiple ways to express their concerns, ask questions, and provide feedback on the Company's services.

The Communications Department, together with the Chief Operation Officer (COO) and Chief Executive Officer (CEO), are responsible for overseeing these processes.

**Effectiveness is assessed by monitoring the number of complaints or issues raised and successfully resolved, providing a tangible measure of responsiveness to community concerns.**

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Aegean Motorway implements various measures to record the views of affected communities, with particular attention to vulnerable and marginalised groups.

These include timely and accurate communication about traffic arrangements, ongoing works and incidents through multiple channels, such as the Company's website, social media platforms, mobile phone applications for quick service, and variable message signs (VMS).

Special facilitation programmes are offered to frequent users, including discount programmes and access cards, enhancing engagement. Complaints and requests can be submitted through various

mechanisms, including a helpline, online forms and physical contact points, ensuring accessible and flexible participation.

Significant care is taken to ensure accessibility and safety for all users, explicitly including vulnerable groups such as people with disabilities. In addition, awareness-raising and prevention campaigns focusing on road safety contribute to the well-being of communities. Aegean Motorway does not operate in areas adjacent to indigenous communities.

Therefore, no incidents of violation of their rights have been recorded or reported, so the relevant requirement does not apply.

## Procedures for remedying negative impacts and channels for affected communities to express their concerns

Aegean Motorway's approach to remedying material adverse impacts on affected communities is based on accountability, transparency and respect for human rights.

### CHANNELS FOR RAISING CONCERNS

In cases where Aegean Motorway identifies that its activities may have caused or contributed to material adverse impacts on affected communities, the Company takes corrective action through its established grievance procedure.

This includes conducting a thorough investigation of the issue and implementing appropriate measures to address and remedy the damage caused. The effectiveness of the correction is assessed by resolving each case, following up with complainants where necessary, and incorporating lessons learned into the Company's internal processes.



Call centre

These channels receive, record, process and respond to all user requests and/or complaints within a reasonable time frame. These contact points also provide, upon request, specialised information in collaboration with the relevant Company personnel, enhancing responsiveness and trust between users and affected stakeholders.

The Company encourages its business partners and contractors to adhere to similar standards for human rights and grievance mechanisms. While Aegean Motorway does not yet maintain formal third-party complaint platforms, it actively promotes responsible behaviour throughout the value chain and expects its partners to maintain effective, secure and transparent channels of communication for submitting complaints and concerns. All complaints submitted are documented and handled with due

In 2024, the average response time to complaints and comments from subscribers and users was 4 calendar days, despite a slight increase in their number by 5.45%.

Aegean Motorway maintains a secure and confidential complaints mechanism that is accessible to employees, contractors, business partners and third parties, including members of affected communities.

Individuals can report potential human rights violations or other concerns through channels such as:



Customer service points

diligence, in accordance with a defined internal procedure. The Company monitors each case from submission to resolution, ensuring transparency and responsiveness. The effectiveness of the complaint submission system is reviewed periodically and feedback from users, complainants and affected stakeholders is taken into account to ensure continuous improvement.

Aegean Motorway guarantees protection from retaliation or any adverse consequences for individuals who express their concerns in good faith. Through this multi-channel and flexible framework,

Aegean Motorway ensures that the concerns of affected communities and motorway users are heard, addressed and resolved in a fair, respectful and effective manner.

## ACTIONS

Aegean Motorway has developed targeted action plans and has dedicated resources to manage material impacts, risks and opportunities in relation to affected communities. The Company invests in environmental studies and systematic monitoring of environmental conditions, ensuring that potential environmental and social risks are identified and addressed in a timely manner.

These efforts contribute to maintaining ecological balance and preventing disruption to the community from the outset.

To mitigate the impact, Aegean Motorway has allocated resources for the installation of noise barriers in sensitive areas and the implementation of specialised traffic management measures during the construction phases. These interventions are supported by internal controls and structured monitoring of complaints, enabling the Company to minimize nuisance and safety risks for residents in neighbouring areas. In addition, a comprehensive air pollutant monitoring programme has been implemented, alongside the development of a strategic road safety plan.

**This plan includes innovative initiatives in collaboration with the Greek Police and Fire Service, with the aim of reducing accidents and achieving the ambitious “Vision Zero” of zero road deaths by 2050.**

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In cases where there is an impact, Aegean Motorway takes remedial action through a structured complaint management system and by implementing technical corrective measures, such as upgrading the affected infrastructure with the aim of restoring community well-being and operational integrity.

Continuous monitoring is a key pillar of the Company’s approach. Through the systematic recording and analysis of complaints and requests from communities, the Company compiles regular reports that are incorporated into its strategy and improve the effectiveness of its response.

Aegean Motorway takes further action to achieve positive impacts for the communities it affects. The Company demonstrates its commitment to social solidarity in practice by supporting education, health and sustainability through a wide range of actions and sponsorships in 2024. It has donated essential equipment to civil protection volunteer groups, such as EPOMEA Volos and EODYA Larissa, as well as to special education schools and treatment centres for people with disabilities.

The Company supports innovative educational initiatives, including sponsorship for the construction of a satellite at the 9th Gymnasium of Larissa to monitor air quality and the replacement of conventional lighting with energy-efficient LED lighting in many schools. In addition, Aegean Motorway promotes environmental efforts by planting trees and sponsoring events for sustainability and the environment. The effectiveness of the above initiatives is monitored through multiple indicators, such as the number of actions

implemented, the volume of requests and complaints recorded, including those that have been successfully resolved, and the participation rates in awareness-raising activities and surveys. In addition, satisfaction levels are assessed through targeted surveys, complaint logging and reporting, providing valuable feedback that helps measure impact and guide the continuous improvement of these actions.

The Company supports these actions with tangible resources, such as specialised staff, dedicated teams for environmental and community issues, and financial investments in impact mitigation infrastructure and social support programmes.

For example, its decision to provide free transportation for residents affected by Storm Daniel reflects both its operational capability and its humanitarian orientation in resource planning. Through this integrated approach, Aegean Motorway not only addresses negative impacts such as pollution, road safety concerns or construction-related disruptions, but also creates opportunities for positive impact.

These include supporting local economies through corporate responsibility initiatives, improving access to essential services, promoting local employment and strengthening community trust through transparent and inclusive communication.

By aligning its activities with community needs and allocating the necessary resources to support them, Aegean Motorway promotes long-term resilience and sustainable development in the areas where it operates.

## MOTORWAY MANAGEMENT CENTRE

The Motorway Management Centre (MMC) operates 24 hours a day, 365 days a year, to meet the operational needs of the motorway. The state-of-the-art facilities of the MMC are located in the Operations

Building in Moschochori, Larissa. The Centre is staffed by trained and specialised personnel, ready at any time to manage and respond each of the more than 15,000 incidents per year, in order to ensure:

- Safe, orderly and high-quality service for motorway customers/users
- Immediate and effective response to emergency and/or urgent situations

A fully equipped, but unmanned, backup Motorway Management Centre operates within the Leptokarya facilities, ready to take over the management of

the Motorway in case of an emergency. The MMC coordinates all parties involved in dealing with incidents that occur on the motorway and ensures:

- The smooth and uninterrupted flow of traffic along the entire length of the motorway
- The control of planning and the proper execution in the field of all works on the motorway
- The coordination of patrol personnel and specially equipped intervention teams, which act accordingly to secure and cover an incident on the motorway, as well as corrective maintenance of the motorway to reduce the likelihood of secondary incidents and limit their potential impact.
- Timely warning of passing drivers about any incidents, severe weather conditions, traffic regulations, etc.

The goal is always to continuously improve road safety and provide optimal service to drivers, and our primary concern is a safe driving environment, with immediate response and handling of any incident. The Integrated Motorway Management System that

has been installed allows the MMC to control the operation and monitor traffic on the motorway in real time. This system consists of open motorway management equipment and tunnel management equipment for the Project.



With regard **to the open motorway**, the traffic management system includes:

- Closed-circuit television (CCTV)
- Emergency Telephones (ERT)
- Traffic Data Collection System
- Variable Message Signs (VMS), Traffic Congestion Signs (Queue Signs), Lane Control Signs (LCS) and Variable Speed Limit Signs (VSLS)
- Overhead Vehicle Detection Systems (OHVD)
- Traffic Control Barriers
- Road Weather Information Systems (RWIS)
- Corporate Vehicle Fleet Monitoring (AVL)
- Information system for recording incidents, scheduling tasks and monitoring the passage of oversized/overweight vehicles

Specifically for **tunnels**, the following systems are added to the above:

- Supervisory Control and Data Acquisition System (SCADA)
- Automatic Incident Detection System (AVID)
- Light signalling (for total closure, one-way traffic, etc.)
- Ventilation, lighting, fire detection and firefighting systems

## INCIDENT RESPONSE ACTION PLANS

Incidents are considered to be conditions that may occur on the motorway and in the wider area, such as traffic accidents, immobilised vehicles,

obstacles or debris on the motorway, adverse weather conditions, problems with users or other incidents such as fires, etc.

In 2024, a coordinated response was carried out to 15,260 incidents within the Project, the majority of which (40.9%) involved providing assistance to immobilised vehicles (fuel, tyres, mechanical breakdowns, etc.).

Traffic accidents in total (with material damage only and/or casualties) account for only 4.1% of incidents.

### Number of incidents for 2024 by category

Immobilised Vehicle	6,239
Traffic accident with material damage	618
Traffic accident with casualties	13
Obstacle on the Roadway	2,056
Live Animal	2,369
Other Incidents	3,965
Total	15,260

The largest number of incidents (36.6%) are detected by the Company's patrols and other personnel, while 30.1% are detected following a call to 1075.

### Number of incidents for 2024 by detection source

Patrols – Company Personnel	5,580
1075	4,591
Emergency Telephone Numbers	72
Closed-Circuit Television and Automatic Incident Detection System	2,932
Police, Roadside Assistance and/or Third Parties	2,085
Total	15,260

In 2024, the Company's average response time to incidents was 26.9 minutes, while the average incident recovery time (from incident detection to traffic restoration) was 68.2 minutes.

In cooperation with the Emergency Services, Aegean Motorway has developed and updated Action Plans for joint incident response, which aim at the coordinated use and management of human and non-

human resources in order to reduce the duration and impact of incidents and increase the safety of road users. Joint action plans have been drawn up with a number of agencies:

# 1

Hellenic Police (EL. AS.), for policing the Project

# 2

National Ambulance Service (EKAV)

# 3

Fire Brigade (FS), for firefighting at the Project

# 4

Roadside Assistance Companies

# 5

Winter Maintenance Subcontractors

As part of the Action Plans, Aegean Motorway, in cooperation with the competent Services, conducts

Readiness Exercises with the participation of all involved parties.

## COLLECTION OF IMMOBILISED VEHICLES

**A**egean Motorway collaborates with companies that have vehicle collection units and are active in the field of transport and/or roadside assistance, to remove vehicles that may have broken down within the Project and affect its smooth and safe operation. The responsibility and liability of the collection units is

to transport the immobilised vehicle, at no charge to the user, to the nearest safe location outside the motorway traffic area (either on the external road network, in a legal and safe parking space, or in areas maintained by us within the motorway for this purpose).

## PATROLS – INSPECTIONS MAINTENANCE & REPAIR WORK

**A**s part of the regular maintenance of the motorway, its equipment and infrastructure:

- Inspections are carried out through patrols throughout the day to detect possible damage/faults and repair them in a timely manner.
- Scheduled regular inspections of motorway equipment, civil engineering and E&M are carried out.
- Maintenance and repair work is carried out on the road surface (potholes), safety barriers, fencing, signage, motorway buildings, etc. maintenance of green areas and cleaning, as well as snow removal during the winter season.
- Maintenance and repair work is carried out on EES equipment and systems both on the open motorway (street lighting, irrigation, motorway management system, toll systems, etc.) and the four tunnels of the Project (electric lighting, generators, SCADA, fire detection, firefighting, etc.).

Aegean Motorway carries out technical policing of the motorway with its own personnel and resources. Patrols are carried out throughout the year by Aegean Motorway personnel, who are suitably trained and equipped with special vehicles fitted with rotating yellow beacons, electronic variable message signs, flashing arrows and portable emergency signage.

TRAFFIC REGULATIONS AND SIGNAGE

In order to accommodate scheduled events (construction/maintenance work, etc.), we are often required to implement special traffic arrangements and take the necessary measures (closure of part or all of the motorway carriageway and its entrances/

exits in combination with temporary restrictions, see speed limits, overtaking, etc.).

The signage used in the management of a planned event is divided into the following categories:

Full Signage

for limited duration works (within one day)

Long-Term Works Signage

upgrade of the above signage for long-term works

Mobile Signage

for mobile short-term works

Emergency Signage

for normal incidents

Mobile Signage

for “mobile incidents” (e.g. special cargo escort, etc.)

Full Signage

for long-duration incidents, when required

The preparation of plans and guidelines for signalling events follows national specifications, as well as

current Greek and international experience and practice.

RESPONSIBLE INFORMATION FOR DRIVERS AND LOCAL COMMUNITIES

During the implementation of temporary traffic arrangements, customers/ motorway users are informed via special temporary signage, such as electronic variable message signs, as well as relevant instructions from the Emergency Services

and/or our staff. Important traffic arrangements (closures) are announced by the media before they are implemented, and prohibitory and/or information signs are placed at appropriate points on the motorway.

# 1 Maintenance of Infrastructure for Driver Safety

## Extensive asphalt pavement maintenance work

- Anti-skid = 421,775 m<sup>2</sup>
- AC20 = 163,120 m<sup>2</sup>

### Planned for 2025:

- Asphalt works covering a total area of approximately 520,000 m<sup>2</sup>
- Restoration of road markings covering an area of approximately 250,000 m<sup>2</sup>

## Repair of expansion joints on bridges

- Total number of bridges with repaired joints: 5 bridges
- Approximately 140 m of joints replaced

The project will continue in 2025 with work on 11 more bridges.

## Technical maintenance works: the project includes work on 26 bridges, 30 culverts and 2 retaining walls

- In 2024, work was carried out on 4 bridges and 15 culverts
- The project began in September 2023 and will be completed in 2025

## Inspection of signal bridges: this involves inspecting 196 metal signal bridges to investigate their structural condition, record any defects and plan the necessary repair measures.

The inspections will be extended into 2025.

## Reinforcement/reconstruction of old bridges (in progress)

Work is planned on 96 bridges and 1 retaining wall, of which:

- Reinforcement of 16 bridges and 1 retaining wall
- Waterproofing of the deck on 16 bridges
- Reconstruction of pavements/new safety barriers on 64 bridges

By the end of 2024, work had been completed on 30 bridges (13 with structural reinforcement - including the Aliakmonas bridge (222AR), 4 with deck insulation and 13 with pavement reconstruction and installation of new safety barriers), as well as the reinforcement of the retaining wall at Glyfa I/C.

The continuation of structural reinforcement of three (3) additional bridges is planned for 2025. The project will continue in 2026.

In 2024, a series of heavy maintenance works were carried out on the motorway.

## Six-monthly inspections and maintenance work on slopes and rockfall protection systems

In accordance with the Inspection Manual, two inspections of rockfall protection measures were carried out in 2024 in the Tembi Valley and the Panteleimon area.

The inspections were followed by light maintenance and cleaning work. According to estimates, the condition of the slopes is stable and rockfall activity remains at a low level.

In addition to the six-monthly inspections, the Concessionaire continuously monitors the prisms/mirrors and crack meters in accordance with the approved Manual.

In parallel with the inspections of the rockfall protection systems, specific works were carried out in 2024 to install additional systems at 12 locations along the Tembi Valley on the artificial slopes. For example, among other things, 1,180 m<sup>2</sup> of Tecco mesh was installed.

Restoration and stabilisation works for the landslide in the Methoni area (Ch 458) – North branch: the works include the construction of a pile wall approx. 100 m long and the reconstruction of the embankment to stabilise the road at this point.

### The works were completed in 2024.

Indicatively, the following were used for the construction, among other things:

- 1,280 m of piles with a diameter of  $\Phi$ 1.20 m
- 155,000 kg of steel
- 150 m<sup>3</sup> of C30/37 concrete

Repair work on geotechnical problems at km 259 of the motorway: this refers to landslide repair work in the wider area upstream and downstream of the motorway. The restoration includes two pile walls, one on the motorway embankment and one on the side road embankment.

### The works are scheduled to be completed in the first quarter of 2025.

Indicatively, the following are used for the construction, among other things:

- 972 m of piles with a diameter of  $\Phi$ 1.50 m
- 700 m of piles with a diameter of 0.80 m
- 275,000 kg of steel
- 413 m<sup>3</sup> of C30/37 concrete
- 2,877 m<sup>2</sup> gabion baskets

Repair work on geotechnical problems at the Agioi Theodoroi junction exit (KP 262.4) - Northern branch of the motorway: refers to the presence of cracks in the motorway embankment due to its height and slope. The repair works include the extension of the existing culvert and the reshaping of the embankment with an improved slope.

#### The works were completed in 2024.

Indicatively, the construction involved, among other materials:

- 3,860 m<sup>3</sup> of embankment and riprap materials

Restoration works on the embankment/road surface of bridge 41R (km 287 of the motorway) - direction to Athens due to problems caused by the “DANIEL” floods: the project includes works to regulate the stream bed by installing gabions, restoring the

motorway embankment, and restoring the road pavement and asphalt layers.

#### The works will continue in 2025.

Indicatively, the construction involves, among other things:

- 12,000 m<sup>3</sup> of excavation to restore the riverbed
- 8,000 m<sup>3</sup> of embankment to restore the riverbed
- 4,950 m<sup>2</sup> of gabions
- 2,970 m<sup>3</sup> of backfill to restore the road
- 4,000 m<sup>3</sup> of road paving
- 4,039 m<sup>2</sup> of asphalt layers

Maintenance/repairs of building facilities: the project mainly concerns waterproofing works and was carried out on 18 buildings/motorway administration and operation centres, 14 toilet buildings and 4 buildings housing the tunnels' electrical and mechanical equipment.

## 2 New constructions to upgrade user service and safety

### Upgrade of the Katerini Cut & Cover /Tunnel T4

The works include:

- Reinforcement of structural fire resistance
- Heavy maintenance work on all EME systems

The project will significantly extend the structural and operational life of the tunnel, optimise the effectiveness of electronic surveillance, detection and incident management systems within the tunnel, maximise the fire safety of drivers and the surface area accessible to citizens, and significantly reduce operating costs.

Work on the Thessaloniki branch was completed in 2023. Work on the Athens branch is being carried out in 2024, while traffic has been transferred to the new northern branch. The project is expected to be completed in October 2025.

### Upgrade of open bridge tanks on the motorway

In order for the Concessionaire to comply with the approved Environmental Terms of the project, it is necessary to control and manage the rainwater runoff from motorway bridges in terms of the pollution they carry to the receiving waters. For this reason, priority was given to 9 bridge locations, whose rainwater drainage tanks were upgraded to hydrocarbon separators in accordance with EN858, which, in combination with the installation of sampling systems, allows for the control and management of runoff before it reaches the receiving waters.

By 2023, the upgrade of tanks on 7 bridges had been completed, while in 2024 the upgrade of two additional tanks on bridge 114R (Ch. 356.0) was implemented. The upgrade of the tanks on the last bridge – 223R (Ch. 470.5) is planned for 2025.

### Flood protection works in the wider area

Based on two ministerial decisions, flood protection works are underway in the northern section of the motorway (Katerini-Korinos and at the Kleidi toll station) in areas without receptors.

The works will continue in 2025.



## ROAD SAFETY

In 2024, Aegean Motorway presented a comprehensive approach to Road Safety, with targeted and significant initiatives and actions. With the vision and objective of operating a modern motorway in order to offer its users high-level

infrastructure and services, the Company considers road safety to be an extremely important issue, which it addresses through regular monitoring and anticipation of modern challenges, timely action, constant readiness, adaptability and flexibility.

The conclusion of the Company's analysis of road accidents is that there are three main factors that cause them: the driver, the vehicle and the road environment.

With the aim of offering solutions, Aegean Motorway has developed a strategic plan for road safety, according to which:

- There should be effective control of excessive speed
- There must be the ability to quickly locate vehicles travelling in the wrong direction
- Ensure the creation of protected safe parking areas for heavy vehicles
- Ensure and strengthen the monitoring of driver fatigue

To achieve these goals, a series of initiatives are already being implemented in collaboration with the Greek Police and Fire Service, aimed at reducing accidents and returning investment to users, by protecting them even more on the motorway. The main reasons for a driver being involved in a traffic

accident are excessive speed, driving in the wrong direction, and fatigue and drowsiness. In line with its strategic plan to address these causes, Aegean Motorway has equipped and undertaken to strengthen the training of Greek Police officers with a series of actions, specifically:

- Delivery of the TraffiStar S290M system for recording and photographing vehicles that violate the speed limit using radar technology to enhance policing, to the P.A.TH.E. Magnesia Motorway Traffic Department and training of personnel.
- Provision of a pilot system for detecting vehicles travelling in the wrong direction, to strengthen policing at the Leptokarya motorway junction at the Pieria Motorway Traffic Department, for vehicles travelling in the wrong direction.
- Creation of a safe parking area for heavy vehicles in Aerino, Magnesia, which will address the issue of fatigue among heavy vehicle drivers in road transport.
- Training of police authorities on better policing and control of “smart” tachographs.

To address the risks posed by overloaded and poorly maintained heavy goods vehicles, which are responsible for 14% of incidents involving road obstructions, the training needs of police authorities on better policing and control of overloaded heavy

vehicles were covered. With regard to vehicles as a factor in road accidents, for overloaded heavy vehicles (estimated at 10% of heavy vehicles), the response measures are threefold:

**1** Provision of a portable static weighing system for heavy vehicles

**2** Training of Motorway Traffic Department personnel in the static weighing system for heavy vehicles

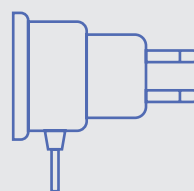
**3** High Speed Weigh In Motion (HS-WIM) systems

To improve the road environment and minimise related incidents, the municipalities of Almyros and Riga Fereou were each given a Mercedes Sprinter van to help with their important work of collecting stray dogs in their area. In addition to the above initiatives, which go beyond its contractual

obligations, Aegean Motorway operates proactively, addressing the possibility of fire in electric vehicles, the number of which is increasing in Greece, by equipping the fire brigades of Leptokarya, Drymonas and Pyrgetos with emergency equipment for the first time in Greece:



Donation of fireproof blankets to prevent the spread of fire



Donation of Emergency Plugs to immobilise vehicles and protect personnel on duty

An additional innovative measure to improve road safety is the automatic detection system for ADR vehicles inside tunnels, combined with the Weigh in Motion System, which monitors in real time the dangerous goods class and weight of vehicles transporting dangerous or flammable materials inside the tunnels. Since 2015, Aegean Motorway's goal has been to create a culture of road safety among future

drivers, and in this spirit, it has been working with the Panos Mylonas Road Safety Institute "Panos Mylonas" Institute, training programmes for school students through interactive programmes approved by the Ministry of Education.

**To date, more than 13,000 people have been trained through these activities.**

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Road safety is at the core of Aegean Motorway's actions and vision, which through its initiatives aims to create the conditions that will lead to "Vision Zero" by 2050, i.e. zero road accidents.

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## SAFE TRUCK PARKING STATION IN AERINO

In January 2020, the Ministry of Infrastructure invited all Greek motorways to participate in a joint EU-funded programme to develop Safe Truck Parking Stations along the Greek motorway network.

Aegean Motorway responded to this call by proposing the construction of two such areas in Aerino (one in each direction) and thus, in July of the same year, the implementation of the European Commission's action 2019- EL-TMC-0264-W for the development of nine (9) Safe Parking Areas for Heavy Goods Vehicles along the Trans-European Network (core) within Greece (INEA/CEF/TRAN/M2019/2099687).

Funding for the above action was included in the Connecting Europe Facility (CEF). The Ministry of Infrastructure and Transport undertook the overall coordination of the action, through the Directorates-General for Strategic Transport Planning and Road Safety of the General Secretariat for Transport and Transport Infrastructure of the General Secretariat for Infrastructure.

At the end of the first half of 2023, the construction of the two stations in Aerino and in both directions of the motorway was completed, which include (in each direction):

- A total area of approximately 18,000 m<sup>2</sup>
- 36 secure parking spaces for trucks
- 20 parking spaces for cars and 2 buses (outside the fenced area)
- Driver rest area with vending machines for snacks and food
- Toilets (men's, women's and disabled) and bathrooms
- Waste management and biological treatment facilities
- Silver level security facilities (24-hour surveillance system, controlled entry/exit, fencing, lighting and signage)



In November of the same year, the two sites began trial operations (free of charge), attracting a significant number of truck drivers every day, who familiarised themselves with the sites and made use of the services offered there. In March 2024, the parking areas in Aerino were certified at Silver security

level by the official body (DEKRA), and in July 2024, following the inauguration ceremony held on 10 July in the presence of the leadership of the Ministry of Infrastructure and Transport, the facilities became fully operational (for a fee).

## SERVICES FOR PROFESSIONALS

### **Procedure for the passage of overweight / oversized vehicles and construction machinery**

**E**nsuring maximum traffic safety is a priority for Aegean Motorway. On a daily basis, the Company informs all drivers about scheduled works and current traffic conditions on the motorway and assists professional drivers of overweight/oversized vehicles/ construction machinery who wish to travel along our Project, providing them with all the information they

need to safely complete their journey through the Passage Possibility Information Service.

At the same time, in constant communication with the Emergency Services, all special crossings are monitored as they progress, with the main focus on the safety of those travelling on the motorway.

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Written notifications/responses to requests for passage from professional drivers with vehicles or combinations of vehicles exceeding the maximum dimensions are processed as quickly as possible, ensuring efficient service.

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## SPONSORSHIPS

Awareness-raising activities and sponsorships for road safety, as well as support for education, health and culture, form a solid basis for planning activities aimed at the communities through which the motorway passes.

## ROAD SAFETY & AWARENESS

- Sponsorship of the 8<sup>th</sup> International Conference on Asphalt Mixtures and Pavements (Mar-24)
- Donation of radar equipment to the Magnesia Traffic Police Department (Apr-24)
- Cement aggregate for the Municipality of Katerini (Apr-24)
- Creation of specialised video training modules on environmentally friendly and defensive driving, for shared use by all AMSA staff. In collaboration with the Panos Mylonas Road Safety Institute (Apr-24)
- Road Safety Festival in secondary schools in the prefecture of Larissa with the participation of the I.O.A.S. 500 students were trained (May-24)
- Co-organisation of the activities of the International Week for the Safety of Motorway Workers (VINCI) (May-24)
- Sponsorship of electronic signage (VMS info) in the Municipal Unit of Methoni (June 24)
- Donation of road construction materials to the Municipality of Almyros for road signage / crosswalks outside the municipality's schools (June 24)
- Equipment for the Magnesia Motorway Police Department (Aug-24)
- European accident-free night in Larissa in collaboration with the Panos Mylonas Road Safety Institute (Oct-24)
- Donation of road safety signage to the community of Krokio Almyrou (Nov-24)
- Organisation of the training course "Rescue in traffic accidents" for Fire Service executives (Nov-24)
- Support for the field exercise: "Design and Construction of Underground Works" by the National Technical University of Athens (Dec-24)

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## SOCIAL SOLIDARITY: SUPPORT FOR EDUCATION, HEALTH AND SUSTAINABILITY

- Donation of equipment to the Volos Civil Protection Volunteer Group (Jan-24)
- Donation to the IONAS Association – Department of Therapeutic Education for People with Disabilities (Feb-24)
- Sponsorship to the 9<sup>th</sup> Lyceum of Larissa for the construction of a satellite – as part of a European school competition that will measure air quality (Feb-24)
- Donation of electronic equipment to the Special Education School of Larissa (Mar-24)
- Sponsorship of the Annual General Meeting of the Thessaly Business and Industry Association (STHEV) (Mar-24)

- Sponsorship of the 4<sup>th</sup> Conference on the Environment and Energy organised by the Association of Greek Women Engineers (Mar-24)
- Donation to the Holy Metropolis of Larissa & Tyrnavos for the technical study for the reconstruction of the Tembi footbridge (Apr-24)
- Sponsorship of the sustainability event “Larissa, a city of the future” organised by the Municipality of Larissa, attended by, among other members of the Government, the Minister of Infrastructure & Transport, Mr. Staikouras (May-24)
- Sponsorship of blood storage equipment for the Blood Donation Unit of Larissa General Hospital (June 24)
- Donation to the non-profit environmental and humanitarian organisation “we4all”, which specialises in tree planting, with the aim of participating in a tree planting event in Larissa, as well as planting 1,000 trees in areas of Greece affected by fires (24 September)
- Donation to EODY Larissa, a voluntary civil protection group, to replace and upgrade the equipment needed for its voluntary activities (Sep-24)
- Workshop on “The Future of Sustainable Development” (Sep-24)
- Donation to the Association of Parents of People with Disabilities in Magnesia (Oct-24)
- Replacement of all conventional lighting with LED lighting at the 6<sup>th</sup> Lyceum of Pieria (Oct-24)
- Sponsorship of equipment for the TRIMAN triathlon in Pieria (Oct-24)
- Sponsorship of the planting of 1,000 trees in areas affected by fires (Oct-24)
- Replacement of all conventional lighting with LED lighting at the 9<sup>th</sup> Lyceum and 5<sup>th</sup> Lyceum of Larissa (Nov-24)
- Three sponsorships for outstanding students from the Regional Units of Larissa, Magnesia and Pieria for the academic year 2024-2025 (Nov-24)
- Organisation of the educational workshop “Compliance training” (Nov-24)
- Tree planting initiative in Larissa with the participation of the Municipality of Larissa and away subscribers (Nov-24)
- Training workshop on Taxonomy (Dec-24)
- Equipment for the organisation of the Olympus Marathon 2024 event (Dec-24)

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## CULTURE

- Major sponsor of the “Olympus Festival” in Pieria (June-24)
- Major Sponsor of the “South Olympus Festival” cultural event organised by the Municipality of Tembi (June-24)
- Festive events for Agia Paraskevi at the Moschochori facilities (July-24)
- Major Sponsor of the cultural event “Olympia en Dio” in Pieria (September-24)



## ADDRESSING THE IMPACT

Aegean Motorway identifies the necessary and appropriate actions through a systematic and participatory process, which includes:

- Environmental and social impact assessments carried out during the design and development stages of projects, in accordance with national and European legislation.
- Monitoring of environmental conditions to ensure compliance and timely identification of potential adverse impacts on local communities.
- Community grievance and complaint mechanisms that allow affected individuals to raise their concerns in a structured and accessible manner.
- Stakeholder engagement sessions and ongoing dialogue with local authorities, civil society and community representatives to understand local sensitivities and expectations.
- Internal audits and risk assessments, including monitoring of key social and environmental performance indicators (KPIs).

These processes help to identify actual and potential negative impacts, such as construction disturbance, increased noise or traffic during peak periods, or impacts on land use, and to determine the necessary

interventions. Aegean Motorway adopts a hierarchical approach tailored to this context in order to address the significant negative impacts on communities:

- Land acquisition and spatial planning are carried out in full compliance with national legal frameworks and European standards, ensuring fairness, transparency and, where necessary, compensation and consultation.
- Construction practices are designed to minimise disruption. Measures include the use of noise barriers, dust suppression techniques, temporary signposted diversions and construction scheduling to reduce disruption to communities.
- Operational measures focus on long-term risk mitigation, such as installing pollution control systems, upgrading safety measures and maintaining infrastructure to avoid interruptions in connectivity or access.
- In the event of closure or decommissioning, although not currently active, the Company is committed to following legal protocols and working with stakeholders to ensure a responsible and inclusive process.

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Where issues are sector-specific or require shared responsibility (e.g. road safety, disaster management, regional infrastructure resilience), Aegean Motorway participates in collaborative efforts with public authorities, emergency services and other private entities.



**A**egean Motorway is committed to providing effective procedures for addressing and remedying material adverse impacts on affected communities. The Company actively engages with local stakeholders throughout the design and implementation of the Project to identify concerns in a timely manner, particularly with regard to community consultation, noise, pollution and disturbances caused by construction and transport activities. When negative impacts occur, such as disturbances to daily life, land loss or safety risks, Aegean Motorway offers formal grievance mechanisms that

allow affected individuals and communities to raise issues directly. These mechanisms are designed to be transparent, flexible and culturally appropriate, ensuring timely investigation and resolution.

The Company also works with local authorities and partners to mitigate impacts and restore community well-being. Through ongoing monitoring and dialogue, Aegean Motorway assesses the effectiveness of these remediation processes and makes improvements where necessary to defend community rights, protect livelihoods and maintain trust.

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In 2024, no serious human rights issues or incidents related to affected communities have been reported.

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## MEASUREMENTS AND GOALS

### Targets

**A**egean Motorway recognises the importance of setting measurable objectives in this area. As part of its ongoing commitment to social responsibility and stakeholder engagement, Aegean Motorway is in the

process of developing relevant targets to better assess and enhance its impact on local communities in the near future.

# Customers and end users

## STRATEGY

### Material impacts, risks and opportunities and their interaction with the strategy and business model

The Double Materiality Assessment (DMA) conducted by Aegean Motorway includes the assessment of impacts, risks and opportunities based on interaction with its particularly valuable customers and end users. Therefore, the Company has identified all customers and end users who may be significantly

affected by its own activities and value chain. **The table below** provides a brief description of the types of customers and end users that are subject to material impacts from Aegean Motorway, either through its own activities or through its value chain.

Type of customers/ end users	Description
Daily users	Individuals who regularly use Aegean Motorway for travel to and from work, school or other daily activities within the motorway network area.
Commercial Transporters	Trucking companies and logistics providers that transport goods and services via the motorway, relying on its infrastructure for timely and efficient deliveries.
Tourists and Visitors	Domestic and international travellers who use the Aegean Motorway to access airports, city centres and tourist destinations in Athens and the surrounding areas.
Emergency Services	Police, fire brigade, ambulance and other emergency teams that depend on the Aegean Motorway for quick access and mobility throughout the region.
Local residents	People living in areas close to the motorway who may be affected by noise, air quality and changes in traffic flow.

The material impacts of the Aegean Motorway on customers and end users mainly concern road users who have access to the motorway through its operations and services in the downstream value chain. Although the services are not inherently

harmful, high accident rates create safety risks. To address these, Aegean Motorway implements the ISO 39001:2012 standard and has invested in emergency telephones, patrols, CCTV cameras and incident detection for rapid response.

In terms of data protection, strict compliance with the GDPR and an ISO 27001:2022-certified system ensure the protection of personal data, such as license plate numbers and toll transactions.

The Company also supports inclusive mobility through accessible infrastructure and improves the user experience with digital tools for trip planning, electronic tolls and real-time updates. These impacts cover both its own activities and those in its downstream value chain.

Aegean Motorway recognises that road users rely on accurate, accessible information – such as real-time updates and safety messages – to travel safely. It recognises the increased risks faced by vulnerable users (people with disabilities and frequent users in general) and those who have concerns about the protection of personal data.

To protect them, it provides accessible infrastructure and implements strict data protection rules through compliance with GDPR and ISO 27001:2022. Aegean Motorway acknowledges that the negative impact of high accident rates is a known systemic issue associated with motorway operation and potentially affecting users of its road network.

However, through the Dual Materiality Assessment (DMA), no significant risks or opportunities related to this issue were identified. In particular, the assessment did not identify end users with specific characteristics who are at significantly higher risk of harm.

Road safety remains a key operational priority for the Company, which continues to implement safety measures, infrastructure improvements and emergency response systems as part of its broader commitment to user well-being and responsible motorway management.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### Description of the material impacts resulting from the materiality assessment

#### Description of impacts

Material impacts				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
S4. Customers and end users	S4. Impacts related to customer and/or enduser information	The Company's strict compliance with the GDPR and the implementation of an ISO 27001:2022 certified Information Security Management System ensures strong protection of users' personal data (e.g. license plates, CCTV camera footage, toll transactions), minimising the risks of data breaches, misuse or privacy violations.	Positive Actual	Company Activities  Downstream – Customers/End Users
S4. Customers and end users	S4. Personal safety of customers and/or end users	Transparent communication about road conditions, road safety campaigns and usage data enhances user confidence and public accountability.	Positive Actual	Company Activities  Downstream – Customers/End Users

Material impacts				
Section	Subsection	Description of impact	Characterisation	Position in the value chain
S4. Customers and end users	S4. Personal safety of customers and/or end users	High accident rates on motorways can have a negative impact on the health, safety and lives of road users.	Negative Potential	Company activities  Downstream – Customers/End Users
S4. Customers and end users	S4. Personal safety of customers and/or end users	The Company's investment in emergency telephones, patrol personnel, CCTV cameras and incident detection systems enhances the safety of road users, enables rapid emergency response and strengthens public confidence in the reliability of motorway operations.	Positive Actual	Company activities  Downstream – Customers/End Users
S4. Customers and end users	S4. Personal safety of customers and/or end users	The implementation of ISO 39001:2012 demonstrates the Company's commitment to systematic management and improvement of road traffic safety, reducing accident rates and enhancing the overall safety environment for motorway users.	Positive Actual	Company activities  Downstream – Customers/End Users
S4. Customers and end users	S4. Social inclusion of customers and/or end users	Providing accessible infrastructure for vulnerable groups promotes safe and inclusive mobility.	Positive Actual	Company activities  Downstream – Customers/End Users
S4. Customers and end users	S4. Social inclusion of customers and/or end users	The provision of digital tools for travel planning, electronic tolls and real-time updates improves user convenience and engagement.	Positive Actual	Company activities  Downstream – Customers/End Users



## POLICIES

At Aegean Motorway, the management of material impacts, risks and opportunities related to customers and end users, including specific groups, is guided by a series of practices that focus on transparency, accessibility and safety. These include timely and accurate communication about traffic arrangements, ongoing works and incidents on the motorway through multiple channels, such as the Company's website, social media platforms, mobile apps for quick service and variable message signs (VMS). Special facilitation programmes, such as discount programmes and access cards, are implemented for regular users, enhancing accessibility and convenience. Mechanisms for submitting complaints and requests, via a dedicated hotline, electronic forms and physical contact points, ensure flexible and inclusive communication.

Significant care is taken to ensure accessibility and safety for all users, with an emphasis on the needs of vulnerable groups, including persons with disabilities.

### Awareness and prevention campaigns further support road safety for all users.

These practices are aligned with international standards, including compliance with the General Data Protection Regulation (GDPR) to protect users' personal data, adherence to the OECD Guidelines for Multinational Enterprises on corporate responsibility, and respect for the fundamental principles of the United Nations Universal Declaration of Human Rights.

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## PROCEDURES FOR WORKING WITH CUSTOMERS AND END USERS ON THE IMPACT

The Company maintains an interactive dialogue policy with its customers and end users, utilising comments, ideas, feedback and complaints as valuable inputs for the continuous improvement of its services and the effective management of actual and potential impacts.

The Management Bodies of Aegean Motorway use a structured approach to inform the Committees and, by extension, the Board of Directors, about the views and interests of stakeholders.

Dialogue is conducted continuously with legal representatives directly or through trusted intermediaries, with daily communication, demonstrating the Company's commitment to maintaining open lines of dialogue. The types of communication are varied, including communication by telephone, in writing, by email, SMS, information

leaflets and by completing special complaint submission forms. In addition, interested parties can communicate via the Company's website and social media platforms, while a 24/7 emergency hotline is available for reporting incidents. Periodic user satisfaction surveys are conducted to gather feedback, and direct communication takes place at service provision sites and customer service points.

Information campaigns are regularly disseminated through the Company's website, social media platforms and local media. Cooperation with representatives of specific groups, such as professional drivers and local communities, further enhances participation and dialogue. This multi-channel approach ensures that stakeholders have multiple opportunities to voice their concerns, ask questions and provide feedback on the Company's services.

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To address the needs of vulnerable groups, special facilitation programmes are in place for regular users, including discount programmes and access cards. Particular attention is paid to ensuring accessibility and safety for all users, with a special focus on vulnerable populations such as persons with disabilities.

## CUSTOMER SERVICE LINE

Aegean Motorway offers various communication options for its customers and has a dedicated customer service team that works diligently every day to help drivers by providing comprehensive answers to their questions.

Aegean Motorway evaluates the effectiveness of its dialogue with customers and end users through this special team, which works daily to support stakeholders by providing detailed information on issues and services related to the Project.

The team meticulously records and manages comments and complaints, ensuring prompt and thorough responses to all requests. This systematic approach to gathering feedback and resolving issues

allows the Company to monitor recurring problems, identify areas for improvement, and implement the necessary adjustments.

As a result, Aegean Motorway continuously improves its service provision and communication with stakeholders, leading to tangible results that meet the needs of all users, including vulnerable groups such as persons with disabilities.

Finally, the Company actively collaborates through the aforementioned channels with customer groups that may be vulnerable (e.g. persons with disabilities) to gather feedback and better understand their specific needs.

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This proactive approach allows Aegean Motorway to continuously adapt its services and communication strategies to effectively support vulnerable users and protect their rights.

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## PROCEDURES FOR REMEDYING NEGATIVE IMPACTS AND CHANNELS FOR CUSTOMERS AND END USERS TO EXPRESS THEIR CONCERNS

### Channels for raising concerns

Aegean Motorway has multiple channels and procedures for handling customer complaints. Each communication method has procedures in place that allow requests and complaints to be collected and managed with the aim of handling them promptly and effectively. The Company handles all complaints

confidentially and in compliance with data protection legislation, ensuring that no information is disclosed that is not required by a public authority.

**Aegean Motorway offers the following direct communication options for its customers:**



1075 - Emergency line (24/7)

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Customer service line



Customer Service Points (CSP)

[www.aegeanmotorway.gr](http://www.aegeanmotorway.gr)

Customers can also use the various channels available in writing, via email, SMS, information leaflets, by filling in the complaint form, via the website and social media to provide feedback.

The Call Centre and Customer Service Points, in collaboration with the relevant Company staff, collect specialised information, process it and respond within an average of 5 calendar days to each request and/or complaint from motorway users. Aegean Motorway monitors and evaluates the issues raised through the systematic evaluation of incoming requests,

categorised by type, such as complaints and positive comments. Response times to queries and complaints are closely monitored to ensure their timely resolution.

In addition, participation rates in user satisfaction surveys provide information on the effectiveness of communication channels. Feedback from these monitoring activities is used to continuously improve the responsiveness and quality of communication channels, ensuring that they meet the needs of stakeholders.

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In 2024, the Company handled a total of 561 complaints, broken down by topic. 78% customer service/eway service, 12% toll operation, 6% toll operation, 2% maintenance and 2% general issues.

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## ACTIONS

### Customer initiatives

# #1

In 2024, Aegean Motorway continued to strengthen its eway subscription service, which is winning over customers who prefer modern, fast and easy electronic transactions at toll stations. The total number of eway transponders issued in 2024 reached

168,778, an increase of 16.7% compared to last year. More specifically: The new MyEway app for mobile phones (for Android and iOS operating systems) has been concluded. With this app, all users have access to:

- Information about the eway service and the Aegean Motorway.
- Real-time updates on projects/events that may affect their journey.
- Calculation of the route and toll costs.
- Contact with the Aegean Motorway customer service department.
- Emergency call (SOS) for immediate communication with the Management Centre of the motorway on which they are travelling.
- Safe driving tips.

In addition, eway subscribers are provided with:

- Information about their subscription account balance.
- The option to top up their account.
- Account data management (editing contact details, changing plans, adding/removing transponders, changing vehicle registration numbers, etc.)
- Provision of transit and transaction data, as well as account statement copies.

## #2

In 2024, to strengthen the customer base of the eway service and enhance its overall commercial activities, the Company launched a series of eway

marketing initiatives, including radio spots, print campaigns and advertising banners.

## #3

During the year, the Company renewed its partnership with vehicle insurance provider Anytime, continuing to offer exclusive benefits to eway subscribers. In addition, the partnership with Piraeus Bank's Yellows rewards programme was

maintained "Yellows" reward programme, allowing eway subscribers to earn and redeem Yellows points every time they top up their account balance using cards issued by the bank.

## #4

Aegean Motorway, as part of its 2024 sustainability initiatives, took the initiative to organise a special tree planting event, which included a raffle offering two electric scooters and five electric bicycles exclusively for eway subscribers, in collaboration with the Municipality of Larissa. On Sunday, 10 November,

more than 200 subscribers and their families planted 150 trees in a designated area belonging to the Municipality of Larissa. The day was filled with positive energy, refreshments, music and a raffle with exciting prizes, creating an unforgettable community experience.

## #5

Aegean Motorway is also committed to addressing the needs of vulnerable and marginalised customers, including people with disabilities. The Company has implemented various measures, including facilitating toll transactions for users with

disabilities through an electronic card system that provides full coverage of toll fees. This initiative not only helps to reduce the financial burden on customers with disabilities, but also ensures their equal access to motorway services.

## NATIONAL CUSTOMER SERVICE WEEK

In October, Aegean Motorway actively participated in National Customer Service Week 2024, organised by the Hellenic Institute of Customer Service (EIEP) and attended by many member companies. Honouring its ongoing commitment to providing excellent service to motorway users, the Company carried out a variety

of activities aimed at both its employees and customers. The activities included a “Meet & Greet” event with world champion Antigoni Drissbioti, guided tours of the Aegean Motorway centre, employee job exchanges, a charity football match and much more.

## REDUCED TOLL PROGRAMMES

The Company values the residents of Thessaly and for this reason has designed and promoted a discount programme called “Moschochori Premium”, which offers tiered discounts for passenger vehicle users, ensuring the lowest toll price at the Moschochori Toll Station: €3 from the first passage, effective from 1 January 2024. With the aim of better serving and facilitating its subscribers, Aegean Motorway has designed a series of discount

programmes based on their needs and habits, offering tiered discounts that in some cases can reach up to 80%. Motorcycle subscribers are eligible for discounts of up to 90%. The Moschochori Return Programme offers an 80% discount on return journeys to the Company’s Frontal Toll Stations, from the 6th transaction within the same calendar month.

**The effect of the discount programme is illustrated below:**

### eway LOCAL Discount Programmes

	2022	2023	2024
PELASGIA	3,083	3,715	4,385
MOSCHOHORI	5,500	6,211	6,019
MAKRYCHORI	9,177	11,426	13,462
PYRGETOS	237	219	257
LEPTOKARYA	5,689	6,984	8,105
KLEIDI	12,441	14,538	16,321

Following a recent amendment to the Concession Agreement (ratified by Law 5125/2024), a new category of vehicles exempt from paying tolls on the motorway, which is managed by Aegean Motorway, has been added.

Specifically, vehicles wholly owned and used by persons with disabilities or war veterans with disabilities are now exempt from tolls, provided that the person is present in the vehicle and holds an official parking card or disability ID card.

To facilitate this process and ensure smooth and fast toll passage, Aegean Motorway has issued a new electronic SID card (orange in colour), which is

issued and sent directly to eligible users. **This card simplifies the toll exemption process, as it:**

- It requires a one-time verification during the application process, eliminating the need for repeated document checks.
- It speeds up passage through toll stations by allowing easy identification of exempt vehicles.

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The initiative was fully implemented in August 2024, and by the end of the year, 6,150 active cards had been issued.

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### MOTORIST SERVICE STATIONS (MSS)

In 2024, the Company introduced new services and upgraded existing motorist service stations (MSS) along the motorway:

- Completion of the renovation of the Korinos MSS.
- Installation and operation of fast charging stations for electric vehicles in the parking areas of the Korinos MSS.
- Installation of fast charging stations for electric vehicles in the parking areas of the Almyros and Skotina motorway service stations, with operation expected to commence in 2025.

The success of these initiatives is assessed using various key metrics, such as the total number of activities carried out, the number of requests and complaints submitted, along with the percentage resolved, and the level of participation in awareness campaigns and feedback surveys. In addition,

consumer satisfaction is measured through focused surveys, systematic documentation of complaints, and the creation of reports. This feedback provides important information that supports the assessment of the Company's impact and leads to the continuous improvement of these efforts.





## HUMAN RIGHTS INCIDENTS

The Company has not had any human rights issues related to its customers, underscoring

its commitment to ethical practices and social responsibility.

## MEASUREMENTS AND TARGETS

### Targets

The Company has set various goals, although specific customer-related goals have not yet been established. **Key goals include:**

- Completion of the Myeway app for mobile phones: Aimed at motorway customers to improve user experience and provide competitive advantages.
- Upgrading services for drivers: By creating additional bus stops (KTEL) at Motorist Service Stations (SSA). A feasibility study is underway for the creation of bus stops at the Evangelismos and Skotina Motorist Service Stations.

Customers and end users contribute to setting goals and improvements mainly through satisfaction surveys that focus on service quality, accessibility

and customer service. The Company systematically analyses requests and complaints submitted by users to identify areas for improvement.

The conclusions drawn from this process are incorporated into performance management procedures, supporting informed decisionmaking and promoting continuous improvement.



# Corporate behaviour

## GOVERNANCE

### The role of the administrative, supervisory and management bodies

The corporate governance framework of Aegean Motorway has been designed to ensure integrity, transparency and accountability in all its activities.

The Board of Directors plays a decisive role, setting an example from the top, in shaping the Company's values and strategic direction, while ensuring compliance with legal, regulatory and corporate governance standards and promoting a strong

ethical culture. The Board of Directors oversees the Company's conduct and corporate policy, ensuring that operations are consistently aligned with the Company's ethical standards and policies.

Composed of experienced executives with specialised expertise in corporate behaviour, the Board of Directors provides effective guidance and oversight at all levels of the Company.

The Company's Code of Conduct and Internal Work Regulations are approved and ratified by the Chief Executive Officer, who is responsible for overseeing their implementation.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### Identification of impacts, risks and opportunities

**A**egean Motorway prioritises the fight against corruption and ethical business practices as fundamental to its activities, being fully aware of the significant financial and reputational risks associated with bribery and fraud. Please refer to the chapter “Double Materiality Assessment Methodology” for a

comprehensive overview of the methodology followed and the results obtained on governance issues. Dual materiality captures all relevant material impacts that have been classified and analyses how these impacts affect the various stakeholders in the value chain and interest groups.

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### The Aegean Motorway Whistleblowing Mechanism strengthens corporate resilience by preventing fraud and promoting ethical behaviour through a secure reporting channel for employees and stakeholders.

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This reduces legal risks and enhances accountability. Over time, it fosters a culture of integrity that attracts investors and talent focused on governance excellence. Beyond risk management, Aegean Motorway’s comprehensive compliance framework,

which includes anti-corruption measures, supplier oversight and whistleblower protection, ensures legal compliance while strengthening the Company’s long-term resilience and reputation as a trusted industry leader.

## PERSONAL DATA PROTECTION POLICY

**A**egean Motorway continuously monitors and assesses the risks associated with the legal framework for personal data protection.

In 2024, it undertook a planned upgrade of the relevant procedures and policies, continuously harmonising them with the guidelines of the Personal Data Protection Authority and the applicable legislation, and continued its staff awareness-raising activities.

Both the corporate website:

[www.aegeanmotorway.gr](http://www.aegeanmotorway.gr)

and the website:

[www.myeway.gr](http://www.myeway.gr)

have posted and described in detail the privacy and cookie policies that are in force and applied.

At the same time, in order to achieve the maximum possible protection of corporate data and the personal data they contain, as well as to comply with the new requirements for the security of network and information systems, the Company continues to upgrade software and implement new specialised technical applications where necessary.

In 2024, no incidents of breaches were recorded, while requests submitted regarding the management of personal data and data subjects were handled in accordance with the applicable legal framework.

Aegean Motorway proceeded with the expansion and reassessment of the Information Security Management System based on the new revision of the ISO 27001:2022, incorporating the new mandatory fields of cybersecurity and personal data security – GDPR.



## INTEGRATED MANAGEMENT – DIGITAL TRANSFORMATION - INNOVATION

**A**egean Motorway SA, recognizing that the data and information produced and managed in the course of its operations is a material asset, and understanding the important role of information as a driving force for maximizing the effectiveness and sustainability of every business decision, has implemented a longterm digital transformation project covering the needs of the entire Company.

Over a period of more than three years, implementing a long-term strategic plan for digital transformation, the Company has ensured a high degree of centralised management of information data, serving employees at all hierarchical levels and ensuring a high degree of flexibility and reliability of its operations, along with a high level of protection and fortification of the company against any risk.

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The Central Digital Management System collects data directly from the sources where it is produced, manages and finalises the data based on approved procedures, and disseminates the information in a controlled manner to end users through established networks and devices.

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**The ultimate goal is the continuous improvement of the central objectives:**

### Technological Infrastructure

- Improvement of production process quality
- Enhancing flexibility

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### Technical Supervision of Devices & Network

- Immediate Detection & Response to Cyber Attacks
- Rational Use of Resources

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### Reliable Infrastructure

- Data Confidentiality
- Data Integrity
- File availability

## Code of Conduct for Employees and Internal Work Regulations

The Company recognises that safeguarding the interests of its shareholders and social partners depends largely on adherence to commonly accepted principles and values of business ethics and conduct by both management and employees.

To this end, Aegean Motorway has adopted this Code of Organisational Conduct, which serves as a declaration of values and principles and sets out the expected daily conduct of both management and employees. The Code of Organisational Conduct for

employees and the Internal Work Regulations are based on the principle of professional responsibility, emphasising that all individuals are accountable professionals who act with integrity, honesty and take full responsibility for their actions. It complements the applicable legislation and is binding on all members of the Company, regardless of their place of work. Management considers it its responsibility to inform all employees, permanent associates and suppliers in order to create a uniform operating framework. To this end, this Code has been created.

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Company personnel must familiarise themselves with its content and ensure compliance with the principles and values described therein, applying them both within and outside the Company.

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The commitment to comply with the Code of Conduct for employees is a right and responsibility shared by all members of the Company. To uphold these standards, the Company has established robust procedures designed to proactively identify any deviations and quickly implement effective corrective measures, ensuring ongoing compliance and improvement. Aegean Motorway cultivates its culture through continuous training, open communication

and initiatives that strengthen employee engagement. Leadership shapes key behaviours, promoting trust, respect and accountability. The Company promotes its values internally and externally, recognising exemplary behaviour and encouraging continuous feedback to strengthen its culture. Corporate culture is assessed through performance reviews and compliance checks, ensuring alignment with strategic objectives and stakeholder expectations.

## MANAGEMENT OF COMPLAINTS SUBMITTED WITHIN THE REGULATORY FRAMEWORK

In order for the Company to be able to identify, report and investigate concerns about illegal behaviour or behaviour that is contrary to its Code of Conduct for employees, it has introduced a complaints line.

The Regulatory Framework Complaint Management Procedure is designed to ensure that the Company has an effective system for handling reports and complaints, allowing for the timely identification of unfair practices or violations.

It provides the necessary guarantees that all complaints are taken seriously, while respecting the principles of confidentiality and anonymity, to

the extent permitted by applicable law, and ensures the protection of the current situation and future professional development of those who submit reports.

Aegean Motorway is committed to protecting whistleblowers and their anonymity in accordance with Directive (EU) 2019/1937.

Furthermore, anonymous reports are only taken into consideration if they provide substantial evidence and clearly describe illegal behaviour that needs to be investigated.

Sensitive personal data, such as information about racial or ethnic origin, political beliefs, health or sexual orientation, is also avoided unless directly related to the report. Reports must also be made in good faith, and the Company is committed

to protecting the identity of the whistleblower, unless disclosure is required by law. It also ensures protection from retaliation, discrimination or any negative impact on the current or future role of the complainant.

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The Company's management encourages employees and third parties to submit reports on criminal acts, suspected illegal behaviour, mismanagement or serious irregularities - omissions identified within the Company.

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Reports may relate to incidents that may involve fraud or corruption, theft, embezzlement, forgery, acts contrary to the interests of Aegean Motorway, incidents of bribery or material violations/irregularities in the provision of services by Aegean Motorway.

If the complainant is involved in the reported misconduct, they remain accountable, although their cooperation will be taken into account during

the investigation. Those named in a report have the right to be informed of the allegations, to know who has access to the information and to be invited to a hearing. In cases where there is a risk of obstructing the investigation, notification may be delayed until the risk has passed.

If a complaint is found to be unfounded, the person concerned will be informed accordingly.

## MANAGEMENT OF BUSINESS RELATIONS WITH SUPPLIERS

The supply chain of Aegean Motorway covers a significant part of the upstream chain, as the Company cooperates with a large number of suppliers, most of whom operate mainly in Greece. Aegean Motorway develops relationships that are characterised by a shared vision for the optimal

quality of the final product and the services it will provide to motorway users. Throughout 2024, the goal was to ensure the uninterrupted supply of all the materials and goods necessary for the Company's operation and to meet the needs that arose in society.

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The Company fully complies with the specifications of the Concession Agreement in accordance with Greek and European legislation and regulations and ensures the selection of reliable suppliers/ partners capable of supporting the operation and maintenance of the motorway.

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The company's needs for a wide variety of products are met through closed/open tenders or direct awards following market research with requests

for quotations. Also through assignments to external partners and the selection of specialised international partners.

The above-mentioned needs concern a wide variety of products (approximately 8,000 recurring codes out of a total of 13,400) and services, which are covered:

- Through closed/open tenders or direct procurement, following market research with requests for quotations for each category. This enables us to obtain materials of the highest quality at a favourable cost. Our suppliers are audited and evaluated annually.
- By selecting specialised international partners.

The main categories of suppliers for Aegean Motorway are:

- The joint venture for the construction of new sections (with full responsibility for the supply of materials and services for the construction activity).
- Contractors for other projects.
- Motorway maintenance contractors (snow removal, etc.).
- Suppliers of materials (fixed assets, spare parts, consumables, etc.).
- Service providers working with the Company's General and Financial Management (chartered accountants, lawyers, consultants, etc.).
- Designers

The above categories of suppliers, except for service providers and consultants, belong to the high-intensity category. During the year covered by this Report, there were no changes in relation to previous years with regard to the above data. The activated Enterprise Resource Planning (ERP) system,

transparency and meritocracy are ensured both in the selection of suppliers through the implementation of a series of procedures and in the sustainable management of the supply cycle, from the emergence of a need to the control and distribution of materials to the relevant departments.



In 2024, we collaborated with

**827** suppliers:

Local suppliers	Central & Northern Greece (Larissa, Magnesia, Pieria, Thessaloniki)	436
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National suppliers	(Central Greece / Attica)	344
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Foreign suppliers		47
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Investment	Local and national suppliers	€74,613,592
		local €30,328,035

Foreign suppliers		€8,256,073
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Total		€113,197,700
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#### CODE OF CONDUCT FOR BUSINESS PARTNERS - SUPPLIERS

The Company has developed a code of conduct for business partners - suppliers, which, among other things, takes into account the relevant risks and

impacts on sustainability issues: **The key elements governing the code are the following principles:**

- Compliance with applicable national and European legislation.
- Respect for human rights and labour relations.
- Compliance with health and safety legislation.
- Protection of the environment.

The Code specifically describes the Company's requirements regarding ethical business practices, such as maintaining accurate financial records, avoiding undue influence (bribery), corruption and money laundering, and avoiding conflicts of interest.

It also addresses issues related to sponsorship, the promotion of fair competition and the protection of information and personal data. These issues are closely linked to sustainable development.

Consequently, Business Partners must comply with all applicable national and international laws and regulations relating to the areas in which they operate.

At the same time, they are expected to adhere to high standards of business ethics and demonstrate adequate compliance with this Code. In addition, Business Partners and their associates are encouraged to report any concerns or potential violations related to this Code to the Company.

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The Compliance Officer keeps a record of all reports and violations received, along with all relevant documents for each case.

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## PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

Fundamental aspect of the Code of Conduct for employees and corporate policy is the strict prevention of bribery and corruption. The Company emphasises that all professional relationships must be conducted with dignity and respect, both towards the counterparty and towards the Company itself.

Accordingly, employees are expected to work with partners and suppliers with transparency and respect. In addition, the Company ensures equal opportunities for potential suppliers, selecting them on the basis of objective and fair criteria. Finally, partners and suppliers are required not only to comply with applicable laws and internationally recognised business standards, but also to embrace strong social and environmental responsibility through best ethical practices.

Given that the issue of corruption and bribery is of significant importance to Aegean Motorway, the Company has established an anti-bribery policy that extends the framework of organisational behaviour.

Specifically, this policy aims to ensure the Company's compliance with the applicable legislative and regulatory framework for combating bribery, with the aim of promoting a clear understanding among all employees of what constitutes bribery and its various forms it can take, as well as ensuring that employees and associates are vigilant against actions that fall within the scope of bribery.

The Compliance Officer is responsible for providing guidance on issues related to corruption and bribery, while the Legal Department is responsible for reviewing and implementing this Procedure. As with the aforementioned policies, the Chief Executive Officer is responsible for its final approval.

If any employee of Aegean Motorway has doubts about how to handle a situation or whether a particular behaviour may violate the Company's anti-bribery policy, they may seek guidance from the Compliance Officer, either verbally or in writing.

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Employees who identify any violation of the applicable anti-bribery policy are encouraged to report the relevant circumstances.

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Reports or complaints regarding incidents of bribery may be submitted through the following channels:

1

Anonymously or openly by email to:

[compliance@aegeanmotorway.gr](mailto:compliance@aegeanmotorway.gr)

2

Anonymously or openly by post to the headquarters of Aegean Motorway (**Moschochori, Larissa**, PC 415 00, for the attention of the Compliance Officer), marked:

“Strictly confidential”

3

Alternatively, the complainant may call the following telephone numbers:

**2414-401000**  
ext. 1150

Aegean Motorway is committed to protecting the complainant from any retaliatory actions related to their position, as mentioned above in the section “Handling complaints submitted within the regulatory framework”.

## MEASURES AND OBJECTIVES

### Confirmed incidents of corruption or bribery

In 2024, Aegean Motorway did not identify any incidents of corruption or bribery, and there were no

finances or convictions for violations of anti-corruption and anti-bribery laws.

Supplier payment indicators	Unit	2024
Number of pending legal proceedings for late payments	No.	0
Average number of days for invoice payment from the date of commencement of calculation of the contractual or statutory payment deadline	No.	30
Percentage of payments aligned with standard payment terms	%	97.81

# GRI TABLE

This report is the Company's tenth Sustainability Report and covers the actions it implemented in 2024 in accordance with the GRI standards for the

period from **1 January to 31 December 2024**. It was assessed by EUROCERT.

## General Disclosures

GRI Standard	Disclosure	Reporting	External Assurance
	2-1 Details of the organisation	<ul style="list-style-type: none"> <li>■ Company History</li> <li>■ Location, and Headquarters</li> </ul>	✓
	2-2 Entities included in the organisation's Sustainability Report	<ul style="list-style-type: none"> <li>■ About the current Report</li> </ul>	✓
	2-3 Reporting period, frequency and contact details	<ul style="list-style-type: none"> <li>■ About the current Report</li> </ul>	✓
	2-4 Restatements of information	<ul style="list-style-type: none"> <li>■ About the current Report</li> </ul>	✓
	2-5 External assurance	<ul style="list-style-type: none"> <li>■ About the current Report</li> </ul>	✓
	2-6 Activities, supply chain and business relationships	<ul style="list-style-type: none"> <li>■ Strategy</li> <li>■ Strategy, Business Model, and Value Chain</li> </ul>	✓
	2-7 Human Resources	<ul style="list-style-type: none"> <li>■ Own Workforce</li> </ul>	✓
	2-8 Employees of Third-Party Companies	<ul style="list-style-type: none"> <li>■ Own Workforce / Characteristics of Non-Salaried Employees within the Company's Workforce</li> </ul>	✓
	2-9 Governance Structure and Composition of the Board of Directors	<ul style="list-style-type: none"> <li>■ Governance</li> </ul>	✓
	2-10 Appointment and selection of the highest governance body	<ul style="list-style-type: none"> <li>■ Governance</li> </ul>	✓
	2-11 Chair of the highest governance body	<ul style="list-style-type: none"> <li>■ Governance</li> </ul>	✓

GRI Standard	Disclosure	Reporting	External Assurance
	2-12 Role of the highest governing body in overseeing impact management	■ Governance / Oversight of Sustainability Matters	✓
	2-13 Assignment of responsibilities for managing impacts	■ Governance	✓
	2-14 The role of the highest governance body in sustainability reporting	■ Governance / Oversight of Sustainability Matters	✓
	2-15 Conflict of interest	■ Governance ■ Due Diligence	✓
	2-16 Communication of Critical Issues	■ Governance	✓
	2-17 Collective knowledge of the highest governance body	■ Governance	✓
	2-18 Performance evaluation of the highest governance body	■ Governance	✓
	2-19 Remuneration policy	■ Own Workforce / Measurements and Targets / Adequate Wages	✓
	2-20 Remuneration Determination Process	■ Workforce / Measurements and Targets / Compensation Indicators	✓
	2-21 Annual Total Compensation Index	■ The Company has not adopted the annual total remuneration index	
	2-22 Management statement on the importance of sustainable development and the relevant strategy	■ Message from Management	✓
	2-23 Corporate policies and commitments	■ The Company's Management ensures the fulfillment of its contractual obligations and the certification of its operations against standards, as well as for the continuous improvement of the effectiveness and efficiency of their implementation	✓

GRI Standard	Disclosure	Reporting	External Assurance
	2-24 Integration of corporate policies	■ Aegean Motorway has a series of policies in place defining the framework and rules of operation and behavior within the organization, aimed at the continuous improvement of the services we provide	✓
	2-25 Procedures for assessing and addressing negative impacts	■ Governance ■ Management of Impacts, Risks, and Opportunities	✓
	2-26 Mechanisms for seeking advice and raising concerns	■ Governance / Information provided to the administrative, management and supervisory bodies of Aegean Motorway. Also, sustainability issues reviewed by such bodies	✓
	2-27 Compliance with laws and regulations	■ Governance / Due Diligence. The Company has not identified any incidents of noncompliance with regulations and laws for the period covered by the Report	✓
	2-28 Participation in bodies	■ Participation and Awards	✓
	2-29 Approach to social partner groups	■ Strategy – Stakeholder Groups	✓
	2-30 Collective labour agreements	■ Own Workforce	✓

### GRI 3: Material Issues

GRI Standard	Disclosure	Reporting	External Assurance
	3-1 Process for determining material topics	■ Management of Impacts, Risks, and Opportunities	✓
	3-2 List of material issues	■ Management of Impacts, Risks, and Opportunities	✓
	3-3 Management of material issues	■ Management of Impacts, Risks, and Opportunities	✓

## GRI 204: Procurement practices

GRI Standard	Disclosure	Reporting	External Assurance
	204-1 Proportion of spending on local suppliers in areas where the Company has significant operations	■ Management of Supplier Relationships	✓

## Environment

GRI Standard	Disclosure	Reporting	External Assurance
GRI 302: Energy	302-1 Energy consumption within the Company	■ Climate Change / Measurements and Targets / Energy Consumption and Mix	✓
GRI 303: Water	303-1 Water consumption	■ Climate Change / Actions / Central Energy Management Software	✓
GRI 304: Biodiversity	304-1 Locations of activities owned, leased, or managed by the organization that are within or near protected areas and areas of high biodiversity value outside protected areas	■ Climate Change / Actions	✓
GRI 305: Air pollutant emissions	305-1 Direct (scope 1) greenhouse gas emissions	■ Climate Change / Measurements and Targets / Scope 1, 2, and 3 Emissions and Total Greenhouse Gas Emissions	✓
	305-2 Indirect (scope 2) greenhouse gas emissions	■ Climate Change / Measurements and Targets / Scope 1, 2, and 3 Emissions and Total Greenhouse Gas Emissions	✓
	305-3 Indirect (scope 3) greenhouse gas emissions	■ Climate Change / Measurements and Targets / Scope 1, 2, and 3 Emissions and Total Greenhouse Gas Emissions	✓
	305-5 Greenhouse gas emissions reduction	■ Climate Change / Measurements and Targets / Scope 1, 2, and 3 Emissions and Total Greenhouse Gas Emissions	✓

## Environment

GRI Standard	Disclosure	Reporting	External Assurance
GRI 306: Liquid and solid waste	306-3 Waste by type and management method	■ Resource Use and Circular Economy / Policies – Actions	✓
	306-4 Waste Diverted from Final Disposal	■ Resource Use and Circular Economy / Measurements and Targets	✓
	306-5 Waste Diverted from Final Disposal	■ Resource Use and Circular Economy / Measurements and Targets	✓

## Employment

GRI Standard	Disclosure	Reporting	External Assurance
GRE 401: Employment	401-1 New employee hires and employee turnover	■ Own workforce / Measurements and targets / Characteristics of the company's employees	✓
	401-3 Parental leave	<ul style="list-style-type: none"> <li>■ Own workforce</li> <li>■ Social protection</li> <li>■ Indicators for work-life balance</li> </ul>	✓

## Occupational Health and Safety

GRI Standard	Disclosure	Reporting	External Assurance
GRI 403: Occupational Health and Safety	403-5: Employee training on occupational health and safety	■ Own workforce / Actions – Health and Safety	✓
	403-9 Type and rates of injury, illness, lost workdays, and absenteeism	■ Own workforce / Health and safety indicators	✓
	403-10 Work-related illnesses	■ Own workforce / Health and safety indicators	✓

## Education and Training

GRI Standard	Disclosure	Reporting	External Assurance
GRI 404: Education and Training	404-1 Average hours of training per year per employee	■ Own workforce / Training and skills development indicators	✓
	404-2 Programmes for employee skills development	■ Own workforce / Training and skills development indicators	✓

## Diversity and equal opportunity

GRI Standard	Disclosure	Reporting	External Assurance
GRI 405: Diversity and equal opportunity	405-1 Diversity of governance bodies and employee breakdown	■ Own workforce / Diversity indicators	✓
	405-2 Ratio of basic salary and remuneration of men and women	■ Own workforce / Compensation indicators	✓

## Antidiscrimination

GRI Standard	Disclosure	Reporting	External Assurance
GRI 406: Anti-discrimination	406-1 Incidents of discrimination and corrective actions	■ There were no incidents of discrimination during the period covered by the Report	✓

## Customer Health and Safety

GRI Standard	Disclosure	Reporting	External Assurance
GRI 416: Customer Health and Safety	416-2 Incidents of non-compliance related to the health and safety impacts of the Company's products and services	■ There were no incidents of noncompliance related to the health and safety of the Company's services during the period covered by the Report	✓

## Economic Performance

GRI Standard	Disclosure	Reporting	External Assurance
GRI 201: Economic Performance	201-1 Direct economic value generated and distributed	<ul style="list-style-type: none"> <li>■ Financial Data</li> </ul>	✓

## Anticorruption

GRI Standard	Disclosure	Reporting	External Assurance
GRI 205: Anticorruption	205-3 Confirmed incidents of corruption and corrective actions	<ul style="list-style-type: none"> <li>■ There were no incidents of corruption during the reporting period.</li> </ul>	✓

## Local Communities

GRI Standard	Disclosure	Reporting	External Assurance
GRI 413: Local Communities	413-2 Processes with significant actual or potential impacts on local communities	<ul style="list-style-type: none"> <li>■ Climate Change</li> <li>■ Pollution</li> <li>■ Affected Communities</li> </ul> <p>There are no negative impacts on local communities, as all necessary measures are taken, fully implementing and exceeding the relevant provisions of existing legislation</p>	✓

## Personal data

GRI Standard	Disclosure	Reporting	External Assurance
GRI 418: Personal data	418-1 Documented reports of privacy violations	<ul style="list-style-type: none"> <li>■ There were no complaints regarding violations of user data privacy during the period covered by the Report</li> </ul>	✓

# ESRS TABLE

This report is the Company's second Sustainability Report, which attempts to comply with

ESRS standards for the period from **1 January to 31 December 2024**.

## General Requirements ESRS 2

Description	Section	Additional Information (Data points covered)
<b>BP-1</b> General basis for preparing the sustainability declaration	About this report	<ul style="list-style-type: none"> <li>■ [ESRS 2-BP-1-5-(a)]</li> <li>■ [ESRS 2-BP-1-5-(d)]</li> <li>■ [ESRS 2-BP-1-5-(e)]</li> </ul>
<b>BP-2</b> Disclosures in relation to specific circumstances	Additional information	<ul style="list-style-type: none"> <li>■ [ESRS 2-BP-2-9-(a)]</li> <li>■ [ESRS 2-BP-2-9-(b)]</li> <li>■ [ESRS2-BP-2-10-(a)]</li> <li>■ [ESRS 2-BP-2-10-(b)]</li> <li>■ [ESRS 2-BP-2-10-(c)]</li> <li>■ [ESRS 2-BP-2-10-(d)]</li> <li>■ [ESRS 2-BP-2-13-(a)]</li> <li>■ [ESRS 2-BP-2-13-(b)]</li> <li>■ [ESRS 2-BP-2-13-(c)]</li> <li>■ [ESRS 2-BP-2-14-(a)]</li> <li>■ [ESRS 2-BP-2-14-(b)]</li> <li>■ [ESRS 2-BP-2-14-(c)]</li> <li>■ ESRS 2- BP-2-15]</li> </ul>
<b>GOV-1</b> The role of administrative, management and supervisory bodies	The role of the Governing Bodies	<ul style="list-style-type: none"> <li>■ [ESRS 2-GOV-1-21-(a,d,e)]</li> <li>■ [ESRS 2-GOV-1-21-(c)]</li> <li>■ [ESRS 2-GOV-1-21-(b)]</li> <li>■ [ESRS 2-GOV-1-22-(a)]</li> <li>■ [ESRS 2-GOV-1-22-(b)]</li> <li>■ [ESRS 2-GOV-1-22-(c)]</li> <li>■ [ESRS 2-GOV-1-22-(ci)]</li> <li>■ [ESRS 2-GOV-1-22-(cii)]</li> <li>■ [ESRS 2-GOV-1-22-(cii)]</li> <li>■ [ESRS 2-GOV-1-22-(d)]</li> </ul>
<b>GOV-2</b> Information provided to the Company's administrative, management and supervisory bodies and sustainability issues addressed by them	Oversight of sustainability issues	<ul style="list-style-type: none"> <li>■ [ESRS 2- GOV2-26-(a)]</li> <li>■ [ESRS 2- GOV2-26-(b)]</li> <li>■ [ESRS 2- GOV2-26-(c)]</li> </ul>
<b>GOV-3</b> Integrating sustainability-related performance into incentive schemes	Leadership on climate issues	-
<b>GOV-4</b> Statement on sustainability due diligence	Due diligence	<ul style="list-style-type: none"> <li>■ [ESRS 2-GOV-4-30]</li> <li>■ [ESRS 2-GOV-4-32]</li> </ul>

## General Requirements ESRS 2

Description	Section	Additional Information
<b>GOV-5</b> Risk management and internal controls relating to sustainability reporting	Risk management and internal controls	<ul style="list-style-type: none"> <li>■ [ESRS 2-GOV-5-36-(a),(c)]</li> <li>■ [ESRS 2-GOV-5-36-(b)]</li> <li>■ [ESRS 2-GOV-5-36-(d),(e)]</li> </ul>
<b>SBM-1</b> Strategy, business model and value chain	Strategy, business model and value chain	<ul style="list-style-type: none"> <li>■ [ESRS 2-SBM-1-40-(a)-(iii)]</li> <li>■ [ESRS 2-SBM-1-40-(a)-(iv)]</li> <li>■ [ESRS 2-SBM-1-(40)-(b)]</li> </ul>
<b>SBM-2</b> Interests and views of stakeholders	Interests and views of stakeholders	<ul style="list-style-type: none"> <li>■ [ESRS 2-SBM-2- 45 (a)-(ii)-(iii)-(iv)-(v)]</li> <li>■ [ESRS 2-SBM-2- 45-(d)]</li> <li>■ [ESRS 2-SBM-2-45 b, AR16]</li> </ul>
<b>SBM-3</b> Material impacts, risks and opportunities and their interaction with the strategy and business model	Material impacts, risks and opportunities	<ul style="list-style-type: none"> <li>■ [ESRS 2- SBM-2-48 a]</li> </ul>
<b>IRO-1</b> Description of the process for identifying and assessing material impacts, risks and opportunities	Identification of material impacts, risks and opportunities	<ul style="list-style-type: none"> <li>■ [ESRS 2-IRO-1-53-(a)]</li> <li>■ [ESRS 2-IRO-1-53-(b,i,iii)]</li> <li>■ [ESRS 2-IRO-1-53-(b)-(ii)]</li> <li>■ [ESRS 2-IRO-1-53-(b-(iv))]</li> <li>■ [ESRS 2-IRO-1-53-(c)-(i)]</li> <li>■ [ESRS 2-IRO-1-53-(c,ii,iii)]</li> <li>■ [ESRS 2-IRO-1-53-(c), (d)]</li> <li>■ [ESRS 2-IRO-1-53-(c)-(iii)]</li> <li>■ [ESRS 2-IRO-1-53-(d)]</li> <li>■ [ESRS 2-IRO-1-53- (b,d,e,f)]</li> <li>■ [ESRS 2-IRO-1-53- (b,iii)]</li> <li>■ [ESRS 2-IRO-1-53- (g)]</li> <li>■ [ESRS E1.IRO-1,20 a, AR 9, AR10]</li> <li>■ [ESRS E2.IRO-1-1-1 a]</li> <li>■ [ESRS E5.IRO-1-1-1 a]</li> <li>■ [ESRS E5.IRO-1-11-(b)]</li> </ul>
<b>IRO-2</b> ESRS disclosure requirements covered by the Company's sustainability statement	Appendices	-

## Climate change | ESRS E1

Description	Section	Additional Information
<b>ESRS 2, GOV-3</b> Integrating sustainability-related performance into incentive programmes	Leadership on climate issues	<ul style="list-style-type: none"> <li>■ [GOV-3 13]</li> </ul>

Description	Section	Additional Information
<b>E1-1</b> Transition plan for climate change mitigation	Transition Plan for Climate Change Mitigation	<ul style="list-style-type: none"> <li>■ [ESRS E1-1-17]</li> <li>■ [ESRS E1-1-16-(c)]</li> </ul>
<b>ESRS 2, SBM-3</b> Material impacts, risks and opportunities, and their interaction with the strategy and business model	Identification of impacts, risks and opportunities	<ul style="list-style-type: none"> <li>■ [SBM-3 18]</li> </ul>
<b>ESRS 2, IRO-1</b> Description of processes for identifying and assessing material climate-related impacts, risks and opportunities	Identification of impacts, risks and opportunities	-
<b>E1-2</b> Policies related to climate change mitigation and adaptation	Policies	<ul style="list-style-type: none"> <li>■ [ESRS E1-2-24]</li> <li>■ [ESRS E1-2-25]</li> </ul>
<b>E1-3</b> Actions and resources related to climate change policies	Actions	<ul style="list-style-type: none"> <li>■ [ESRS E1-3-29-(a)]</li> </ul>
<b>E1-4</b> Objectives related to climate change mitigation and adaptation	Objectives	-
<b>E1-5</b> Energy consumption and mix	Energy consumption and mix	<ul style="list-style-type: none"> <li>■ [E1-5 37, AR 35]</li> <li>■ [E1-5 AR 34]</li> <li>■ [E1-5 AR 34]</li> <li>■ [E1-5 37 a, AR 32, AR 33]</li> <li>■ [E1-5 37 c]</li> <li>■ [E1-5 37 c(ii)]</li> </ul>
<b>E1-6</b> Scope 1, 2, and 3 Emissions and total greenhouse gas emissions	Scope 1, 2, 3 emissions and total greenhouse gas emissions	<ul style="list-style-type: none"> <li>■ [E1-6 53, AR 53]</li> <li>■ [E1-6 46 AR 55]</li> <li>■ [E1-6 44, 52 a, AR 47]</li> <li>■ [E1-6 48 a, AR43]</li> <li>■ [E1-6 49 a, 52 a, AR 45, AR 47]</li> <li>■ [E1-6 51, AR 46]</li> <li>■ [ESRS E1-6 AR43-(c)]</li> </ul>

## Pollution | ESRS E2

Description	Section	Additional Information
<b>ESRS 2, IRO-1</b> Description of procedures for identifying and assessing impacts, risks and opportunities related to material pollution	Identification of impacts, risks and opportunities	-

## Pollution | ESRS E2

Description	Section	Additional Information
<b>E2-1</b> Policies related to pollution	Policies	-
<b>E2-2</b> Actions and resources related to pollution	Actions	-
<b>E2-4</b> Air, water and soil pollution	Air, water and soil pollution	-

## Resource use and circular economy | ESRS E5

Description	Section	Additional Information
<b>ESRS 2, IRO-1</b> Description of processes for identifying and assessing impacts, risks and opportunities related to the use of material resources and the circular economy	Identification of impacts, risks and opportunities	-
<b>E5-1</b> Policies related to resource use and the circular economy	Policies	-
<b>E5-2</b> Actions and resources related to resource use and the circular economy	Actions	-
<b>E5-4</b> Resource inputs	Resource inputs	■ [E5-4 30]
<b>E5-5</b> Resource outflows	Resource outflows	<ul style="list-style-type: none"> <li>■ [E5-5 37 c, AR32]</li> <li>■ [E5-5 37 c, AR32]</li> <li>■ [E5-5 37 b, AR31]</li> <li>■ [E5-5 37 b, AR31]</li> <li>■ [E5-5 37 b, AR31]</li> </ul>

## Company Personnel | ESRS S1

Description	Section	Additional Information
<b>ESRS 2, SBM-2</b> Stakeholder interests and views	Interests and views of stakeholders	-

## Company Personnel | ESRs S1

Description	Section	Additional Information
<p><b>ESRS 2, SBM-3</b> Material impacts, risks and opportunities and their interaction with the strategy and business model</p>	Material impacts, risks and opportunities and their interaction with strategy and business model	<ul style="list-style-type: none"> <li>■ [ESRS S1.SBM-3 14 a]</li> <li>■ [ESRS S1.SBM-3 14 b]</li> <li>■ [ESRS S1.SBM-3 14 c]</li> <li>■ [ESRS S1.SBM-3 14 d]</li> <li>■ [ESRS S1.SBM-3 14 f i,ii]</li> <li>■ [ESRS S1.SBM-3 14 g i,ii]</li> <li>■ [ESRS S1.SBM-3 15]</li> </ul>
<p><b>S1-1</b> Policies relating to the Company's workforce</p>	Policies	<ul style="list-style-type: none"> <li>■ [ESRS S1-1 19]</li> <li>■ [ESRS S1-1 20]</li> <li>■ [ESRS S1-1 21]</li> <li>■ [ESRS S1-1 20]</li> <li>■ [ESRS S1-1 20a]</li> <li>■ [ESRS S1-1 20b]</li> <li>■ [ESRS S1-1 20c]</li> <li>■ [ESRS S1-1 22]</li> <li>■ [ESRS S1-1 23]</li> <li>■ [ESRS S1-1 24a]</li> <li>■ [ESRS S1-1 24b]</li> <li>■ [ESRS S1-1 24c]</li> <li>■ [ESRS S1-1 24d]</li> </ul>
<p><b>S1-2</b> Procedures for communicating with employees and employee representatives about impacts</p>	Procedures for communicating with employees and employee representatives about the impacts	<ul style="list-style-type: none"> <li>■ [ESRS S1-2 25]</li> <li>■ [ESRS S1-2 27]</li> <li>■ [ESRS S1-2 27a]</li> <li>■ [ESRS S1-2 27b]</li> <li>■ [ESRS S1-2 27c]</li> <li>■ [ESRS S1-2 27d]</li> <li>■ [ESRS S1-2 27e]</li> <li>■ [ESRS S1-2 28]</li> </ul>
<p><b>S1-3</b> Procedures for addressing negative impacts and channels for employees to raise concerns</p>	Procedures for remedying negative impacts and channels for employees to express their concerns	<ul style="list-style-type: none"> <li>■ [ESRS S1-3 32d]</li> <li>■ [ESRS S1-3 32c]</li> <li>■ [ESRS S1-3 32b]</li> <li>■ [ESRS S1-3 32e]</li> <li>■ [ESRS S1-3 33]</li> </ul>
<p><b>S1-4</b> Taking measures regarding material impacts on the Company's workforce and approaches to mitigating material risks and seeking material opportunities related to the workforce, as well as the effectiveness of these actions</p>	Actions	<ul style="list-style-type: none"> <li>■ [ESRS S1-4 38a]</li> <li>■ [ESRS S1-4 38b]</li> <li>■ [ESRS S1-4 38c]</li> <li>■ [ESRS S1-11 74]</li> <li>■ [ESRS S1-4 38d]</li> <li>■ [ESRS S1-4 39]</li> <li>■ [ESRS S1-4 40a]</li> <li>■ [ESRS S1-4 40b]</li> <li>■ [ESRS S1-4 41]</li> <li>■ [ESRS S1-4 43]</li> </ul>
<p><b>S1-5</b> Objectives related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities</p>	Objectives	<ul style="list-style-type: none"> <li>■ [ESRS S1-5 46]</li> <li>■ [ESRS S1-5 4-(a), (b), (c)]</li> </ul>

## Company Personnel | ESR S1

Description	Section	Additional Information
<b>S1-6</b> Characteristics of the Company's employees	Characteristics of the Company's employees	<ul style="list-style-type: none"> <li>■ [ESRS S1-6 50a, AR 57]</li> <li>■ [ESRS S1-6 50b]</li> <li>■ [ESRS S1-6 50c]</li> <li>■ [ESRS S1-6 50c, AR 59]</li> <li>■ [ESRS S1-6 50d]</li> </ul>
<b>S1-7</b> Characteristics of persons not employed in the Company's workforce	Characteristics of non-salaried workers within the Company's workforce	-
<b>S1-8</b> Coverage of collective bargaining and social dialogue	Coverage of collective bargaining and social dialogue	-
<b>S1-9</b> Diversity indicators	Diversity indicators	-
<b>S1-10</b> Adequate wages	Adequate wages	-
<b>S1-11</b> Social Protection	Social Protection	-
<b>S1-12</b> Persons with disabilities	Persons with disability	-
<b>S1-13</b> Education and skills development indicators	Training and skills development indicators	-
<b>S1-14</b> Health and safety indicators	Health and safety indicators	-
<b>S1-15</b> Work-life balance indicators	Work-life balance indicators	-
<b>S1-16</b> Remuneration indicators (wage gap and total remuneration)	Remuneration indicators (wage gap and total remuneration)	-
<b>S1-17</b> Incidents, complaints and serious human rights impacts	Incidents, complaints and serious human rights impacts	-

## Affected communities | ESRs S3

Description	Section	Additional Information
<p><b>ESRS 2, SBM-2</b> Interests and views of stakeholders</p>	Interests and views of stakeholders	-
<p><b>ESRS 2, SBM-3</b> Material impacts, risks and opportunities and their interaction with the strategy and business model</p>	Material impacts, risks and opportunities and their interaction with strategy and business model	<ul style="list-style-type: none"> <li>■ [ESRS S3.SBM-3 9 c]</li> <li>■ [ESRS S3.SBM-3 9 b]</li> <li>■ [ESRS S3.SBM-3 9 a i]</li> <li>■ [ESRS S3.SBM-3 9 a ii]</li> <li>■ [ESRS S3.SBM-3 9 a iii]</li> <li>■ [ESRS S3.SBM-3 9 a iv]</li> <li>■ [ESRS S3.SBM-3 10]</li> </ul>
<p><b>S3-1</b> Policies related to affected communities</p>	Policies	<ul style="list-style-type: none"> <li>■ [ESRS S3-1 14]</li> <li>■ [ESRS S3-1 16a]</li> <li>■ [ESRS S3-1 16b]</li> <li>■ [ESRS S3-1 16c]</li> <li>■ [ESRS S3-1 17]</li> </ul>
<p><b>S3-2</b> Procedures for communicating with affected communities about impacts</p>	Procedures for engaging with affected communities regarding impacts	<ul style="list-style-type: none"> <li>■ [ESRS S3-2 21]</li> <li>■ [ESRS S3-2 21a]</li> <li>■ [ESRS S3-2 21b]</li> <li>■ [ESRS S3-2 21c]</li> <li>■ [ESRS S3-2 23]</li> </ul>
<p><b>S3-3</b> Procedures for remedying negative impacts and channels for raising concerns in affected communities</p>	Procedures for remedying negative impacts and channels for raising concerns in affected communities	<ul style="list-style-type: none"> <li>■ [ESRS S3-3 27a]</li> <li>■ [ESRS S3-3 27b]</li> <li>■ [ESRS S3-3 27c]</li> <li>■ [ESRS S3-3 27d]</li> </ul>
<p><b>S3-4</b> Measures taken regarding material impacts on affected communities and approaches to managing material risks and pursuing material opportunities related to affected communities, as well as the effectiveness of these actions</p>	Actions	<ul style="list-style-type: none"> <li>■ [ESRS S3-4 32b]</li> <li>■ [ESRS S3-4 32c]</li> <li>■ [ESRS S3-4 31]</li> <li>■ [ESRS S3-4 32a]</li> <li>■ [ESRS S3-4 33a]</li> <li>■ [ESRS S3-4 36]</li> </ul>
<p><b>S3-5</b> Objectives related to managing material negative impacts, promoting positive impacts, and managing material risks and opportunities</p>	Objectives	-

## Customers and end users | ESR S4

Description	Section	Additional Information
<p><b>ESRS 2, SBM-2</b> Interests and views of stakeholders</p>	Interests and views of stakeholders	-
<p><b>ESRS 2, SBM-3</b> Material impacts, risks and opportunities and their interaction with the strategy and business model</p>	Material impacts, risks and opportunities and their interaction with strategy and business model	<ul style="list-style-type: none"> <li>■ [ESRS S4.SBM-3 10, AR 5-6]</li> <li>■ [ESRS S4.SBM-3 10a i]</li> <li>■ [ESRS S4.SBM-3 10 a ii]</li> <li>■ [ESRS S4.SBM-3 10 a iii]</li> <li>■ [ESRS S4.SBM-3 10 a iv]</li> <li>■ [ESRS S4.SBM-3 10-(b),(d)]</li> <li>■ [ESRS S4.SBM-3-11]</li> </ul>
<p><b>S4-1</b> Policies relating to customers and end users</p>	Policies	-
<p><b>S4-2</b> Procedures for communicating with customers and end users about impacts</p>	Procedures for communicating with customers and end users about impacts	<ul style="list-style-type: none"> <li>■ [ESRS S4-2 20,AR 17]</li> <li>■ [ESRS S4-2 20a, AR 14]</li> <li>■ [ESRS S4-2 20b, AR 16]</li> <li>■ [ESRS S4-2 20c, AR 15-16]</li> <li>■ [ESRS S4-2 20d]</li> <li>■ [ESRS S4-2 21]</li> </ul>
<p><b>S4-3</b> Procedures for addressing negative impacts and channels for customers and end users to express concerns</p>	Procedures for remedying negative impacts and channels for customers and endusers to express concerns	<ul style="list-style-type: none"> <li>■ [ESRS S4-3 25a, AR 18]</li> <li>■ [ESRS S4-3 25b, AR 19]</li> <li>■ [ESRS S4-3 25c]</li> <li>■ [ESRS S4-3 26,AR 23]</li> </ul>
<p><b>S4-4</b> Taking measures regarding material impacts on customers and end users, as well as approaches to managing material risks and pursuing material opportunities related to customers and end users, and effectiveness of these actions</p>	Actions	<ul style="list-style-type: none"> <li>■ [ESRS S4-4 31a, AR 35]</li> <li>■ [ESRS S4-4 35]</li> </ul>
<p><b>S4-5</b> Objectives related to managing material negative impacts, promoting positive impacts and managing material risks and opportunities</p>	Objectives	-

## Corporate Behaviour | ESRS G1

Description	Section	Additional Information
<b>ESRS 2, GOV-1</b> The role of administrative, supervisory and management bodies	The role of administrative, supervisory and management bodies	<ul style="list-style-type: none"> <li>■ [ESRS GOV-15a]</li> <li>■ [ESRS GOV-15b]</li> </ul>
<b>ESRS 2, IRO-1</b> Description of procedures for identifying and assessing material impacts, risks and opportunities	Identification of impacts, risks and opportunities	-
<b>G1-1</b> Corporate behaviour policies and corporate culture	Corporate behavior Policies	<ul style="list-style-type: none"> <li>■ [ESRS G1-1-9,AR 1]</li> <li>■ [ESRS G1-1-10-(a)]</li> <li>■ [ESRS G1-1-10-(c), (e)]</li> </ul>
<b>G1-2</b> Supplier relationship management	Supplier relationship management	<ul style="list-style-type: none"> <li>■ [ESRS G1-2-15-(a), (b)]</li> </ul>
<b>G1-3</b> Prevention and detection of corruption and bribery	Prevention and detection of corruption and bribery	<ul style="list-style-type: none"> <li>■ [ESRS G1-3-18-(a)]</li> <li>■ [ESRS G1-3-21-(c)]</li> <li>■ [ESRS G1-3-18-(b), (c)]</li> <li>■ [ESRS G1-3-20]</li> </ul>
<b>G1-4</b> Incidents of corruption or bribery	Confirmed incidents of corruption or bribery	-
<b>G1-5</b> Political influence and lobbying activities	Confirmed incidents of corruption or bribery	-
<b>G1-6</b> Payment practices	Confirmed incidents of corruption or bribery	<ul style="list-style-type: none"> <li>■ [G1-6 33 a]</li> <li>■ [G1-6 33 b]</li> </ul>



# List of data points in horizontal and topical standards derived from other EU legislation

Disclosure requirement	Data point	Sustainability Disclosures   Annex	SFDR Reporting
ESRS 2 GOV-1	21 (d)	Gender diversity on the Board of Directors	✗
ESRS 2 GOV-1	21 (e)	Percentage of independent members of the board of directors	
ESRS 2 GOV-4	30	Statement on due diligence	✗
ESRS E1-5	37	Energy consumption and mix	✗
ESRS E1-6	44	Gross Areas 1, 2, 3 and total greenhouse gas emissions	✗
ESRS E1-6	53-55	Intensity of gross greenhouse gas emissions	✗
ESRS E5-5	37 (d)	Non-recyclable waste	✗
ESRS E5-5	39	Hazardous and radioactive waste	✗
ESRS 2 SBM3 - S1	14 (f)	Risk of forced labour incidents	✗
ESRS 2 SBM3 - S1	14 (g)	Risk of incidents of child labour	✗
ESRS S1-1	20	Human rights policy commitments	✗
ESRS S1-1	21	Due diligence policies on issues covered by the International Labour Organisation's fundamental Conventions 1 to 8	

Pillar 3 Reporting	Benchmark Regulation Report	Report on the EU Climate Regulation	Section
	X		The role of the BoD
	X		The role of the BoD
			Statement on due diligence
			Energy consumption and mix
X	X		Gross Scopes 1, 2, 3 and Total GHG emissions
X	X		Energy consumption and mix
			Resource outflows
			Resource outflows
			Material impacts, risks and opportunities and their interaction with strategy and business model
			Material impacts, risks and opportunities and their interaction with strategy and business model
			Policies
	X		Policies

Disclosure requirement	Data point	Sustainability Disclosures   Annex	SFDR Reporting
ESRS S1-1	22	Procedures and measures to prevent human trafficking	✗
ESRS S1-1	23	Workplace accident prevention policy or management system	✗
ESRS S1-3	32 (c)	Workplace accident prevention policy or management system	✗
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of occupational accidents	✗
ESRS S1-14	88 (e)	Number of days lost due to injuries, accidents, fatalities or illnesses	✗
ESRS S1-16	97 (a)	Gender pay gap (unadjusted)	✗
ESRS S1-16	97 (b)	CEO pay ratio relative to average employee pay	✗
ESRS S1-17	103 (a)	Discrimination incidents	✗
ESRS S1-17	104 (a)	Non-compliance with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines	✗
ESRS S3-1	16	Human rights policy commitments	✗
ESRS S3-1	17	Non-compliance with the UN Guiding Principles on Business and Human Rights (UNGPs), the principles of the International Labour Organisation (ILO) and the OECD Guidelines	✗
ESRS S3-4	36	Human rights issues and incidents	✗

Pillar 3 Reporting	Benchmark Regulation Report	Report on the EU Climate Regulation	Section
			Policies
			Policies
			Processes to remediate negative impacts and channels for own workers to raise concerns
		X	Health and safety metrics
			Health and safety metrics
		X	Compensation metrics (pay gap and total compensation)
			Compensation metrics (pay gap and total compensation)
			Incidents, complaints and severe human rights impacts
		X	Incidents, complaints and severe human rights impacts
			Policies
		X	Policies
			Actions

Disclosure requirement	Data point	Sustainability Disclosures   Annex	SFDR Reporting
ESRS S4-1	16	Policies relating to customers and end users	✗
ESRS S4-1	17	Non-compliance with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines	✗
ESRS S4-4	35	Human rights issues and incidents	✗
ESRS G1-4	24 (a)	Fines for violating anti-corruption and bribery laws	✗



Pillar 3 Reporting	Benchmark Regulation Report	Report on the EU Climate Regulation	Section
			Policies
	X		Policies
			Actions
	X		Confirmed incidents of corruption or bribery



# External independent external assurance report for the 2024



EUROPEAN INSPECTION AND CERTIFICATION COMPANY S.A.

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## EUROCERT Independent Audit/Inspection Statement for the 2024 Sustainable Development Report of AEGEAN MOTORWAY (No. 00.16.0017)

### Information on the Independent Audit/Inspection Statement

The Assurance Provider EUROCERT has been engaged to provide external assurance on the disclosures published in the Sustainability Report 2024 ('the Report') of AEGEAN MOTORWAY S.A. ('the Company'). The Company is exclusively responsible for the data and information within the Report. The assurance process was conducted by EUROCERT in terms of sample-based audits of data and information, as well as audits of data collection systems and procedures.

Economic and financial data were not verified. Instead, they were assessed concerning the information contained in the 2024 annual financial statement which has been verified by other third parties.

The intended users of this Statement are all the stakeholders of the Company.

### Scope of Works

EUROCERT undertook and implemented the following quality assurance activities from November 2025 to January 2026:

1. Review of the Report against the requirements of Global Reporting Initiative (GRI) Sustainability Reporting Guidelines, to confirm that the "in accordance with the GRI Standards" requirements are fulfilled,
2. Verification of the data included in all the chapters of the Report.
3. Use of remote audit techniques, including interviews with the Sustainability Team and the main executives of the Company, and sampling inspections of files, to evaluate:
  - the reliability and accuracy of performance indicators of the Sustainability Report
  - the processes for generating, gathering, and managing information included in the Report
  - the adherence to the principles of inclusivity, materiality, and responsiveness to stakeholders.



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### Limitations

1. The objective evidence was found via int contacting external stakeholders.

### Conclusions

During the assurance engagement, it was confi chapters of the Report are accurate and reliab and assertions was found to be within ac comprehensive and proper presentation of pe information and there is an effective data gat place for issues that pertain to sustainable devel

EUROCERT concurs that the "in accordance with met.

### Opportunities for Improvement

Based on the observations and concluding rema EUROCERT's recommendations for the improv Reports are as follows:

- Provision of information for additional perf topics of the GRI Standards.

### Statement of Independence, Impartiality and C

EUROCERT is an independent professional se environmental, health, safety and social acco experience in conducting verification over enviro information, systems and processes.

EUROCERT is an accredited certification body t that complies with the requirements of sever maintains a comprehensive system of quality procedures regarding compliance with ethical applicable legal and regulatory requirements.

EUROCERT has implemented a Declaration of relevant procedures which ensure that all en maintain high standards in their day-to-day busi



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external sources of the Company and not via

It is confirmed that the data and information of all the  
disclosed statements are within acceptable limits. The Company provided a  
performance based on reasonably documented  
management and reporting system in  
compliance with the requirements.

The "GRI Standards" requirements have been

Benefits derived from the assurance engagement,  
contribution to the Company's future Sustainability

Performance indicators related with material

**Competence**

Services company that specializes in quality,  
reliability. Its assurance team has extensive  
environmental, social, ethical and health and safety

Company that operates a Quality Management System  
in accordance with international accreditation standards and accordingly  
control including documented policies and  
requirements, professional standards, and

Impartiality and Independency and several  
employees, that work for or on behalf of it,  
business activities. We are particularly cautious in



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the prevention of conflicts of interest. EUROCERT has a few existing commercial contracts  
with the Company regarding management systems certification activities. Our assurance  
team does not have any involvement in other projects with the Company that would cause a  
conflict of interest and has never provided any consulting services to the Company.

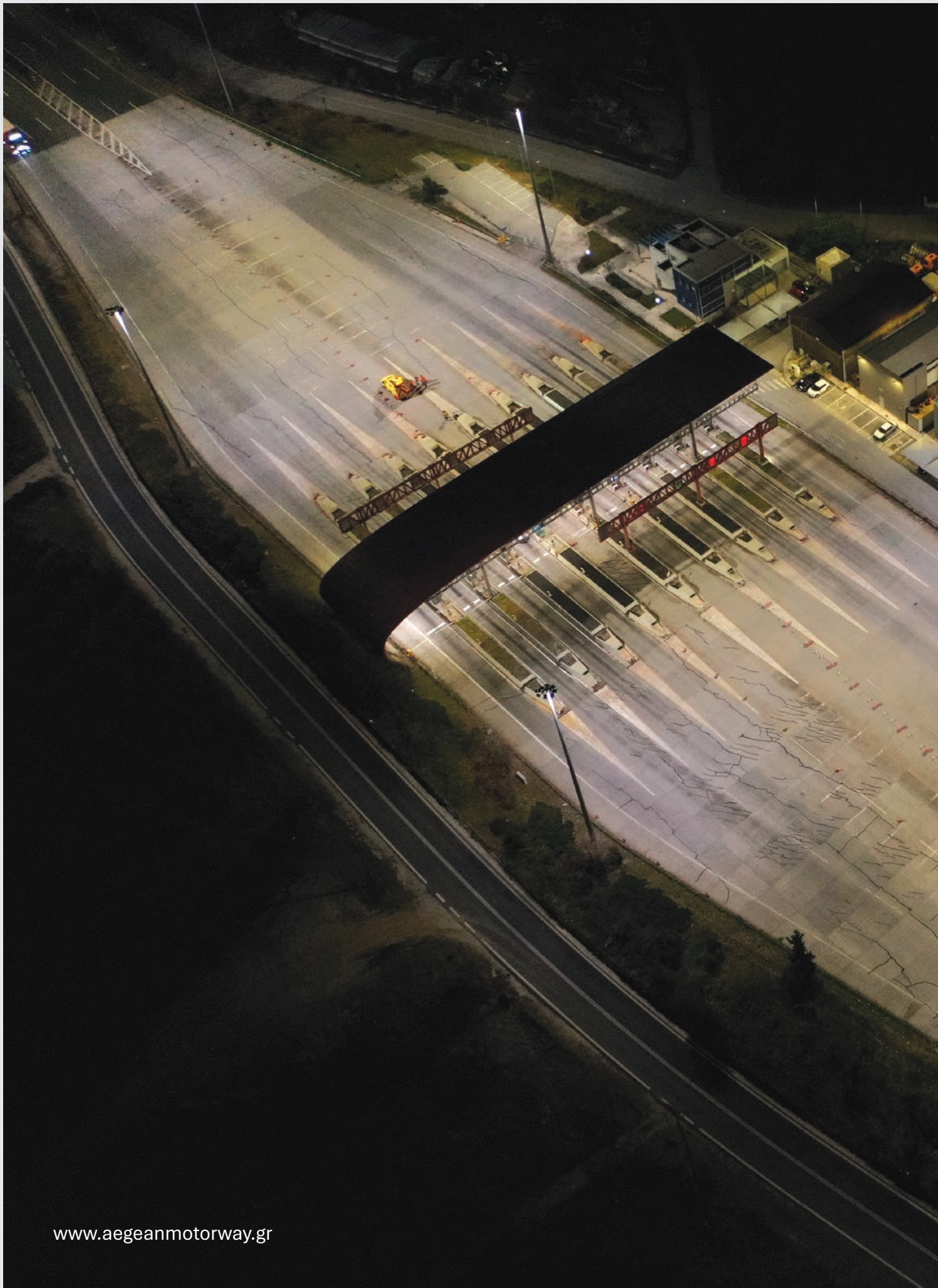
*Note: This Independent Assurance Report has been prepared as a translation of the original Greek  
version*

For EUROCERT,  
Metamorphosi, 27<sup>th</sup> of January 2026

  
General Certification Director  
Athina Chalkiopoulos

Lead Auditor  
Antonios Kastρινakis







**AEGEAN  
MOTORWAY**



