



transport
for athens

sustainable development report



2023



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SUSTAINABLE DEVELOPMENT REPORT

2023

ATHENS TRANSPORT GROUP (OASA-STASY-OSY)

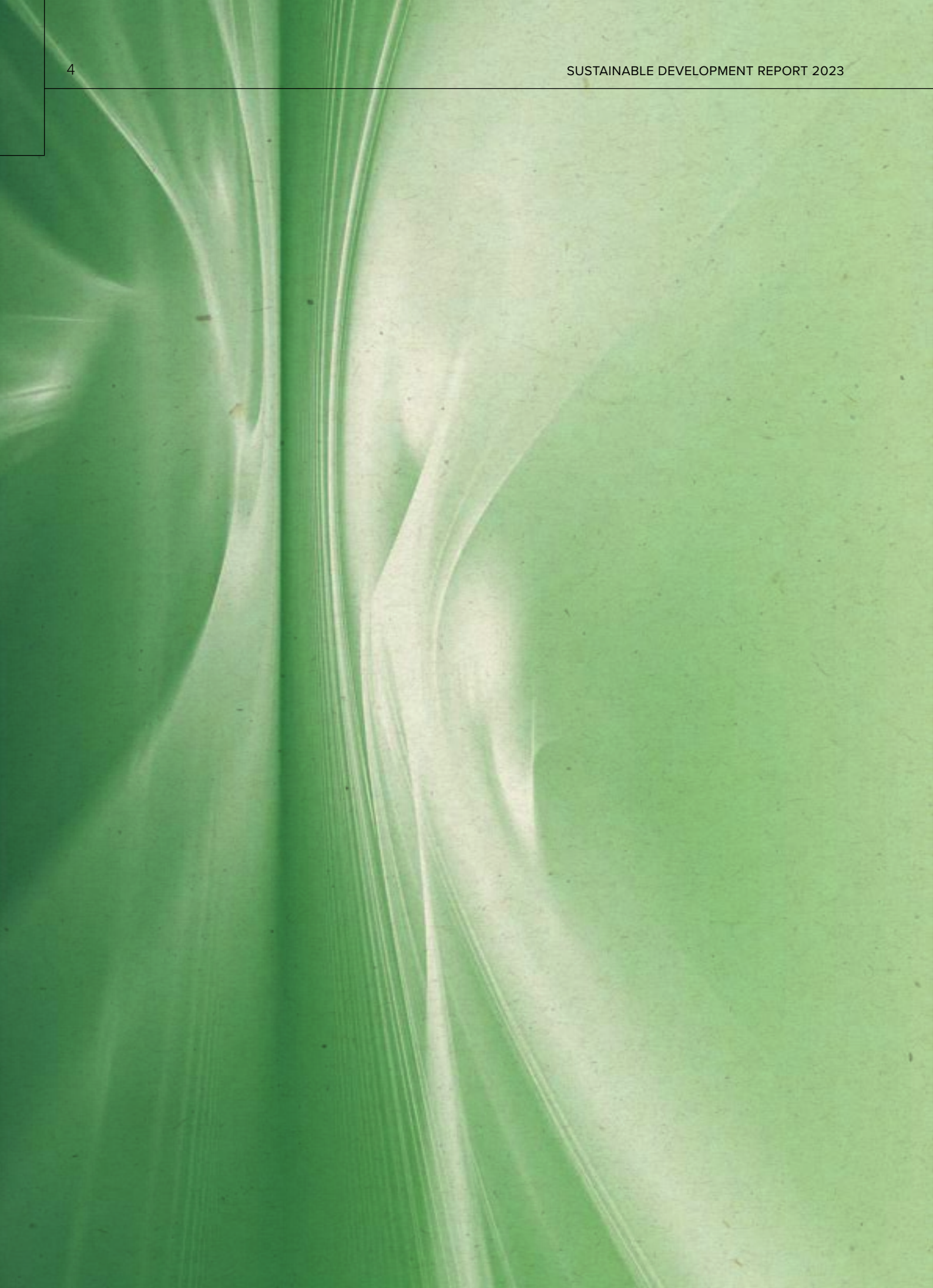


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Contents

Management Message	5
2023 at a Glance	6-7
1. About Athens Transportation Group	8
1.1 Profile	9
1.2 Vision, Mission and Values	11
1.3 History and Milestones	12
1.4 Value Chain and Business Relations	16
1.5 Memberships and Collaborations	18
2. Approach to Sustainable Development	19
2.1 Management of Sustainable Development Issues	29
2.2 Stakeholder involvement	30
2.3 Double Materiality Analysis	32
3. Environment	38
3.1 Climate Change	39
3.2 Resource and Waste Management	43
4. Society	45
4.1 Labour Relationships and Practices	46
4.2 Sustainable Urban Mobility	60
5. Governance	68
5.1 Corporate Governance	69
5.2. Business Ethics	72
6. Appendix	76
6.1 About the Sustainable Development Report	77
6.2 GRI Content Index	78
6.3 SASB Index	81
6.4 Key ESG Performance Indicators (KPIs)	81



Management Message

GRI 2-22

We are delighted to present the Sustainable Development Report for the companies of the Athens Transport Group (OASA, OSY, STASY). This report marks a significant milestone in our journey to create a modern and efficient transport operator that can meet the challenges of our time. As part of our ongoing commitment to service enhancement, we have developed this study with a focus on the Group's material topics related to sustainability and innovation.

Continuously improving our environmental performance

Public transport, as a key component of sustainable urban mobility, is an efficient and environmentally friendly mode of transportation that significantly reduces greenhouse gas emissions. One of our central priorities is the renewal of our bus fleet and the transition to electrification. To further reduce our environmental footprint and provide more eco-friendly mobility options, we are exploring the use of electric and alternative fuel vehicles in the medium term. Additionally, we are implementing a series of actions to enhance our internal sustainability and combat the effects of climate change. These actions include upgrading the energy efficiency of our supporting infrastructure, improving the recording and monitoring of resource consumption, and utilizing renewable energy sources.

Our environmental responsibility goes hand in hand with our social responsibility

Achieving sustainable urban mobility is a key priority for the Group, as the benefits will be multiplied for all residents of Attica. Our strategic action plans focus on enhancing mobility services and improving the overall passenger experience. In addition to renewing and upgrading our bus fleet, we are developing technical

solutions to offer new services, such as contactless ticketing (EMV) and Mobility as a Service (MaaS). These innovations will make daily life easier for our passengers by providing fast and easy payment options and enabling the creation of combined mobility packages using various modes of transport (urban transport, taxi, bicycle, etc.). The Attica Strategic Transport Plan, currently being implemented over the next two years, will lead to the development of integrated proposals to improve sustainable mobility and the efficient operation of public transport within the Athens Transport area of responsibility.



We actively support sustainable urban mobility and work daily to strengthen it.

ity to act as an agent of change. We actively support sustainable urban mobility and work daily to strengthen it. However, we believe that achieving our goals requires collective effort. We need all of you to join us. Together, guided by a common vision of cooperation and driven by the goal of enhancing the sustainability and resilience of urban passenger transport, we are ready to meet the challenges ahead and create a better future for Athens Transport.

Focus on our people

Emphasizing the human factor and our employees remains a cornerstone of our philosophy. The people working within the Athens Transport Group are the key to our success and are central to our strategy. We are committed to investing in their education, professional development, and well-being, ensuring a safe, attractive, and inclusive work environment that fosters solidarity, cooperation, and support. The Athens Transport Group operates with the obligation and responsibility

George Spiliopoulos
CEO of OASA


2023 at a Glance

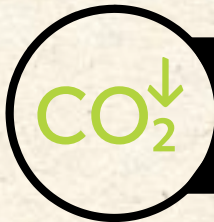
Sustainable and environmentally friendly Urban Transport System in Attica

15%
energy savings from the implementation of the braking energy recovery system by STASY

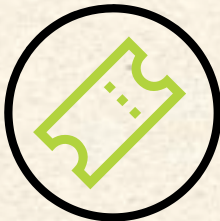
14%
of OSY vehicles are powered by electricity

12%
12% less energy consumption from the renovated rolling stock of STASY

 **2,039,393,599.99 MJ** **energy consumption**

 **100,434.96 t CO₂e**, direct GHG emissions (Scope 1)
55,022.58 CO₂e, indirect GHG emissions (Scope 2 location based)
79,078.93 CO₂e, indirect emissions of GHG (Scope 2 market based)

236,225,609
embarkations of STASY



215,118,203
embarkations of OSY

464



new employees hired

7,395
employees



105 | **4,749** | **2,541**
OASA | OSY | STASY





Tap'N'Pay: Introduction of contactless transactions (ENV) for public transport journeys using bank cards



Operation of chatbot for better service to citizens and application for the functionality of lifts on Metro Lines 1,2 and 3



Free WIFI pilot application at Acropolis Metro station

Passenger awareness campaign for ticket recharging

Development of a new Strategic Transport Plan for Attica

525,939
routes
of STASY

863,887
routes
of KTEL

4,033,409
routes
of OSY

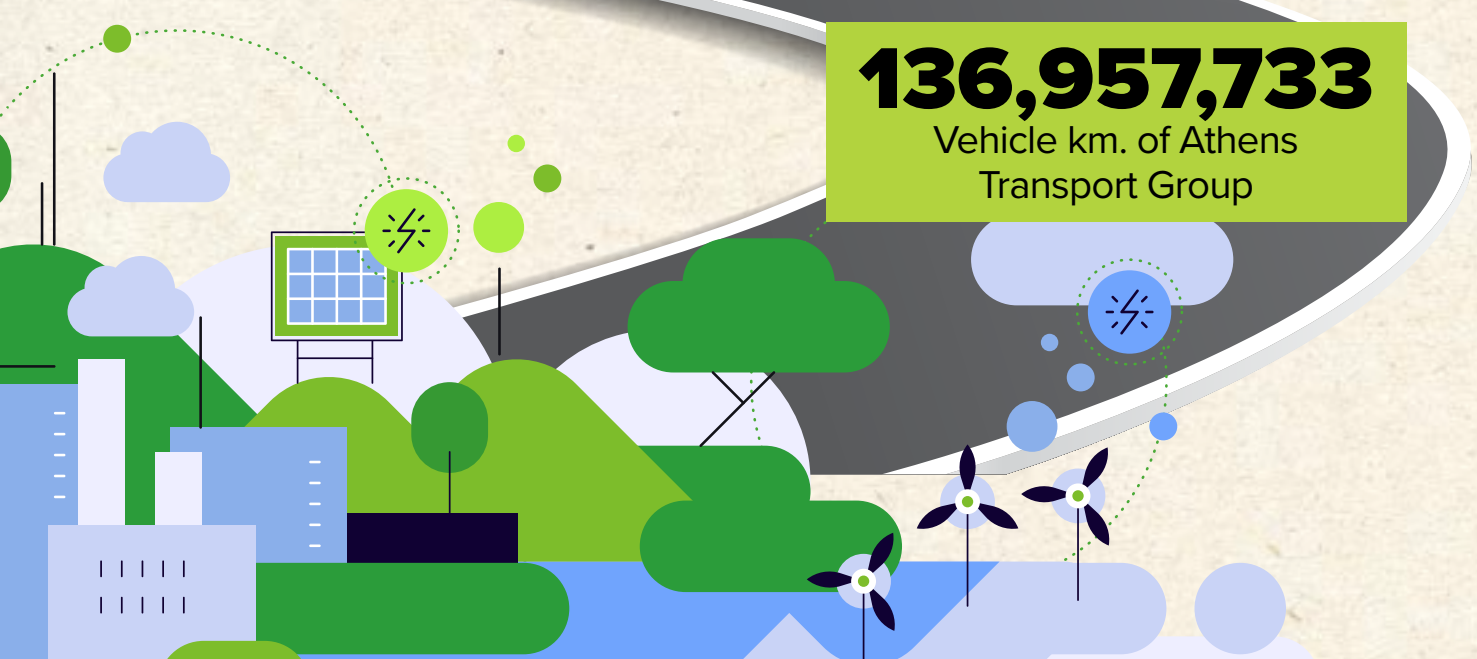
5,423,235
routes operated
by Athens
Transport
Group


65,387,918
Vehicle-km. of OSY

18,024,278
Vehicle km. of KTEL

53,545,537
Vehicle-km. of STASY

136,957,733
Vehicle km. of Athens
Transport Group



A nighttime photograph of a city street. On the left, a tram or train is blurred into a series of horizontal light trails, moving from left to right. The street is illuminated by streetlights, and buildings are visible in the background. On the right side of the image, there is a large, classical stone archway, possibly a remnant of an ancient structure. The overall color palette is dark with yellow and white highlights from the lights.

1. About Athens Transportation Group

1.1 Profile

GRI 2-1, GRI 2-6

Athens Urban Transport Organization S.A. (OASA)

OASA S.A. is a Legal Entity of Private Law, public utility, operating in the form of a Societe Anonyme. It was founded by Law 2175/1993, as the universal successor of OAS. It is a 100% subsidiary of the Hellenic Corporation of Assets and Participations (HCAP - Growthfund), was founded in 1993 and is based in Athens, at 15 Metsovo Street. OASA has two subsidiaries, Road Transport S.A. (OSY S.A.) and Urban Rail Transport Single Member S.A. (STASY S.A.).

Road Transport S.A. (OSY)

OSY S.A. was established pursuant to the provisions of Law 3920/2011 (Government Gazette 33/B/03.03.2011) and is a Legal Entity of Private Law, serving public utility purposes, falling under the category of organizations and enterprises of the wider public sector and operating under the rules of the private economy. As a Transport Company (TPPC), it is coordinated and controlled by OASA S.A., which is its sole shareholder, under the supervision of the Ministry of Infrastructure and Transport. OSY S.A. is based in privately owned facilities, at 6 Parnassou Street, in the Municipality of Agios Ioannis Rentis, where the Central Administrative Services of the company are housed.

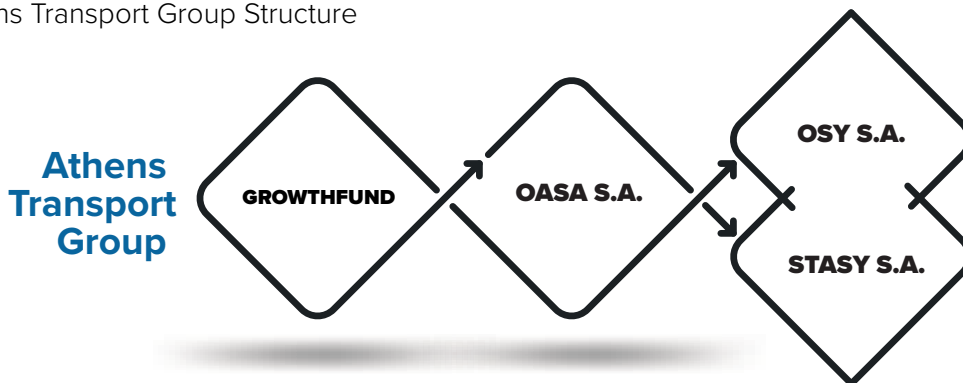
Urban Rail Transport S.A. (STASY)

STASY S.A. is a Legal Entity of Private Law that serves public utility purposes and falls under the category of organizations and enterprises of the wider public sector (DEKO). It operates on the basis of the rules of the private economy. As a Transportation Project Provision Company (TPPC), it is coordinated and controlled by OASA S.A. and is governed by the provisions of Laws 3920/2011 and 4972/2022 as in force, as well as by the provisions of the legislation on sociétés anonymes. The company is supervised by the Ministry of Infrastructure and Transport, is not listed on the Stock Exchange and its sole shareholder is OASA S.A. STASY S.A. does not belong to Article 23 Paragraph 2 of Cap. C of Law 993/79.

It is a public company for the development and operation of the network of metro lines 1, 2 and 3, and tram in Attica, as a renaming of Attiko Metro Operation Company (A.M.E.L. S.A.), in which TRAM S.A. and Athens-Piraeus S.A. (I.S.A.P. S.A.) merged in the light of the general restructuring of the public sector and the restructuring of urban transport. Urban Rail Transport (STASY) is based in Athens, at Athinas 67.

OASA and its subsidiaries operate in the Attica basin and form the "Athens Transport Group".

Chart 1: Athens Transport Group Structure



The Role of Athens Transport Group

The Athens Transportation Group (OASA S.A. – OSY S.A. – STASY S.A.) is the largest transportation operator in Greece, responsible for the control and operation of public transport in Athens and Piraeus, but also in the wider area of the Attica basin and other areas of the prefecture of Attica. Its goal is to provide reliable transportation services so that Urban Transport is established in the consciousness of the citizens of the basin and the visitors of the city, as the first choice for their urban transportation. The main responsibilities of Athens Transport are reflected in the table below:

Table 1: Responsibilities of the Athens Transport Group

Athens Transportation Group (OASA – OSY – STASY)	<ul style="list-style-type: none"> • The exploitation, development and disposal of all kinds of assets.
OASA	<ul style="list-style-type: none"> • Strategic and operational planning and the coordination and control of the provision of transport services in all Public Transport Modes. • The control and supervision of TPPCs. • The distribution of transport work in TPPCs. • The assignment and supervision of transportation and traffic studies. • The preparation of a five-year Strategic Plan and the approval of the Business Plans of the Group's companies. • The specifications of the level of passenger service. • The regulation of matters relating to the conduct of public transport in the area of its competence and, in particular, the definition, abolition and extension of lines, the definition of routes and routes, the starting points, terminations and stops of each line. • The control of public transport routing schedules. • The collection and processing of the operating data of the transport companies and the recommendation to the Minister of Infrastructure and Transport for the determination of the appropriate fare and the financing of their investment and development programs.
OSY / STASY	<ul style="list-style-type: none"> • The proposal to the Minister of Infrastructure and Transport for the definition of the technical specifications of the types of public transport vehicles, in cooperation with the TPPCs. • Sales promotion, planning, collection and fare controls. • The execution of the transport project according to its planning and distribution by OASA. • The preparation of business plans and their submission for approval to OASA. • The study, solution and generally treatment of any problem related to the execution of the transport project. • The study, supply, maintenance, repair, use and utilization of their rolling stock and other material. • Provisional and final acceptance, as well as monitoring of the works and supplies executed by ATTIKO METRO on behalf of the Athens Transport Group.

The Role of OASA in the Greek Economy

As the parent company of OSY and STASY, OASA is responsible for business planning (both ground and underground public transport), coordination, and control of the transport operations carried out by its subsidiaries. Additionally, OASA oversees the promotion of sales for the Athens Transport Group, as well as the planning, collection, and fare control. Based on project, cost, and quality indicators included in the transport contracts with EPSE, OASA S.A. also manages the distribution of revenues among the companies.

According to the provisions of Law 4512/2018, as of January 1, 2018, all ownership shares have been transferred to Growthfund. The Group has the following key obligations to its Shareholder (Growthfund):

- Aligning with the strategic, operational, and financial objectives of Growthfund to maximize long-term financial value.
- Complying with Growthfund's rules and instructions regarding restructuring, corporate governance, corporate compliance, supervision, social responsibility, transparency of procedures, and accountability.
- Creating benefits that align with the Group's crucial developmental, economic, and social role, particularly in providing public services in accordance with the relevant EU framework and specific obligations assigned to OASA by the state.
- Seeking synergies between the activities of its subsidiaries and introducing best practices in internal management to improve the Group's operations and services, achieving cascading benefits such as economies of scale and alignment of horizontal policies.

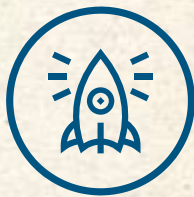
1.2 Vision, Mission and Values



Vision

The Athens Transportation Group has as its primary concern the contribution to the prosperity and economic development of the country through the development of sustainable and attractive Public Transport, so that they become the first choice of transportation in the greater Athens area, thus contributing to the economic, social and environmental development of the capital.

"Our vision is the effective coverage of transport needs of the citizens of the capital with quality services."



Mission

The mission of the Athens Transport Group is the strategic and operational planning, coordination and control of the transportation work carried out by public transport (ground and underground) in the Attica Region, as well as the promotion of reforms through restructuring, optimal corporate governance, transparency and innovation, with responsible management and social responsibility.



Values

Achieving the vision and mission requires a framework of principles and values including:

Defending Public Interest

The Group is committed to the better management and utilization of the fleet and the entire passenger transport infrastructure, with the aim of creating long-term value, increasing revenues and thus providing better, more efficient, safer and high-quality passenger transport services to citizens.

Groupness

The Group ensures the promotion of a corporate culture of "grouping" through the implementation of each new reorganization action.

Equality

Every intervention in the urban transport system of Attica ensures non-discriminatory access for all individuals, with particular attention to people with disabilities and vulnerable social groups.

Viability

Any intervention in the urban transport system of Attica is based on the system's sustainability, i.e. ensuring it in the long term.

Transparency

The Group operates with transparency, accountability and open communication, information and consultation with all interested parties, aiming to build and strengthen trust with citizens in the procedures and operation of OASA and its subsidiaries, OSY and STASY.

Meritocracy and Social Responsibility

The Group operates in a meritocratic manner, promotes diversity and ensures, at the same time, equal treatment and opportunities in the workplace, forbidding prejudice

Respect for Citizens' Rights

The Group acts responsibly towards society as a whole and demonstrates behavior within the framework of principles of professional and business ethics, which does not damage its image, reputation and work.

Partnerships

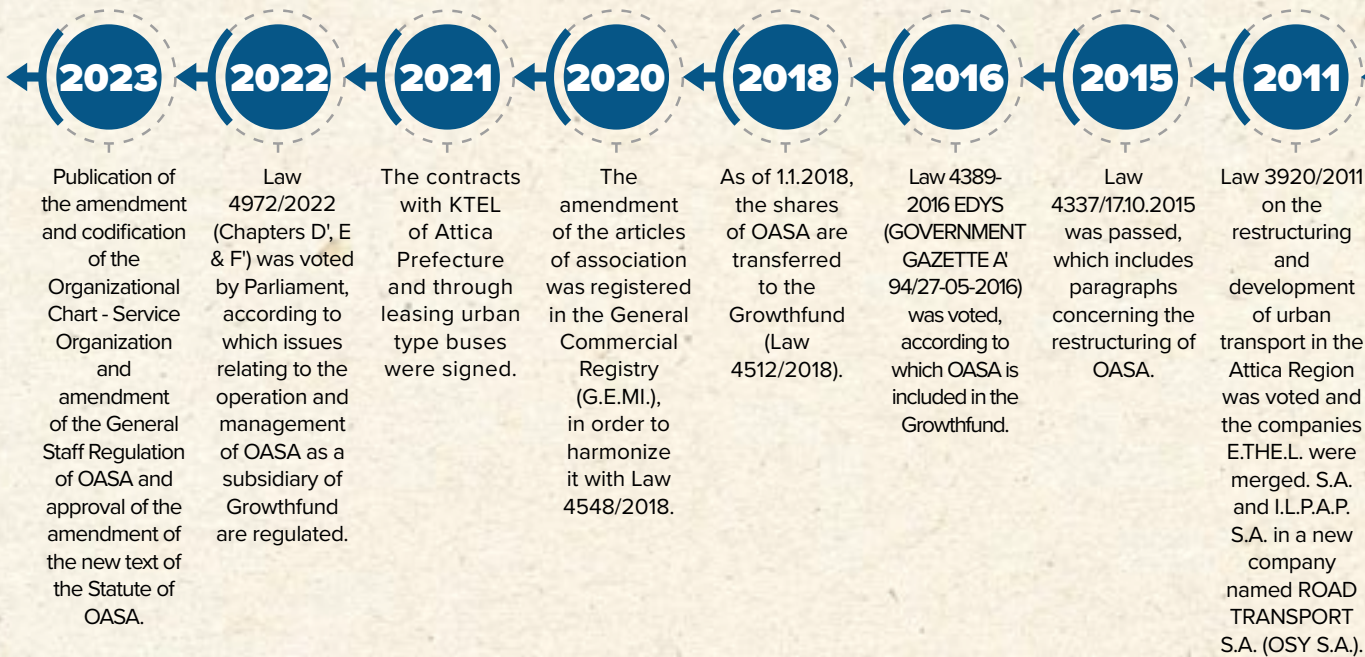
In order to achieve its goals, the Group constantly seeks, promotes and utilizes partnerships with all interested parties.

Consultation

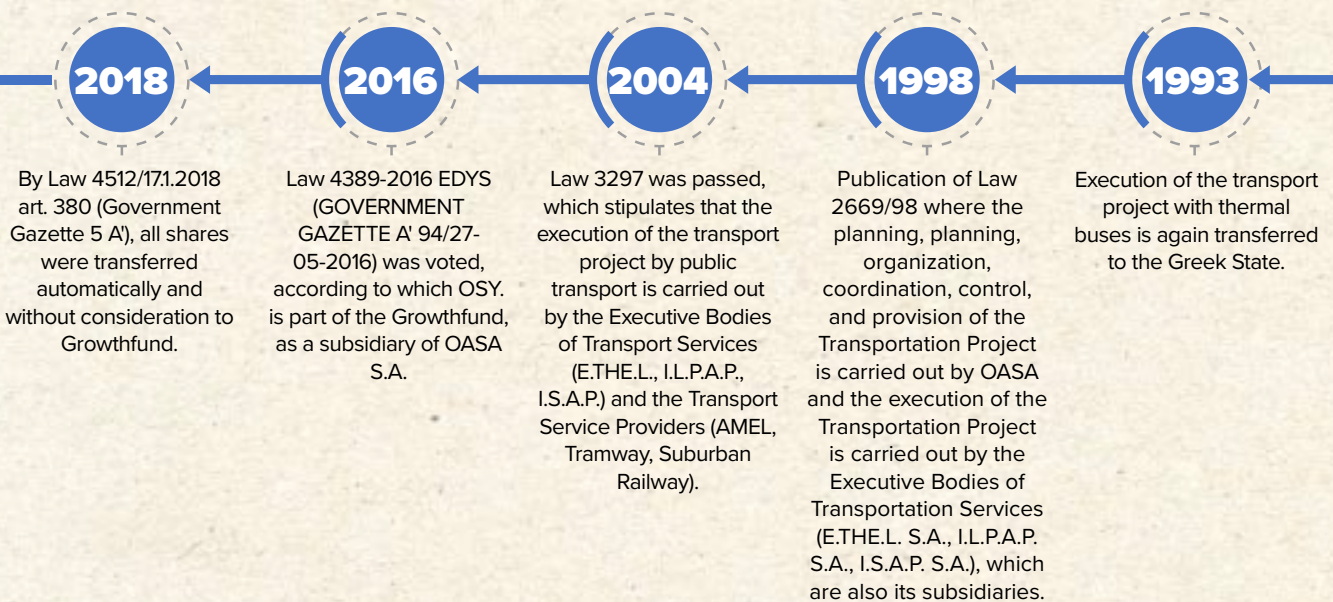
The planning of Attica's transport project is the subject of active participation of productive and social forces, through the participation of institutions and citizens using modern means.

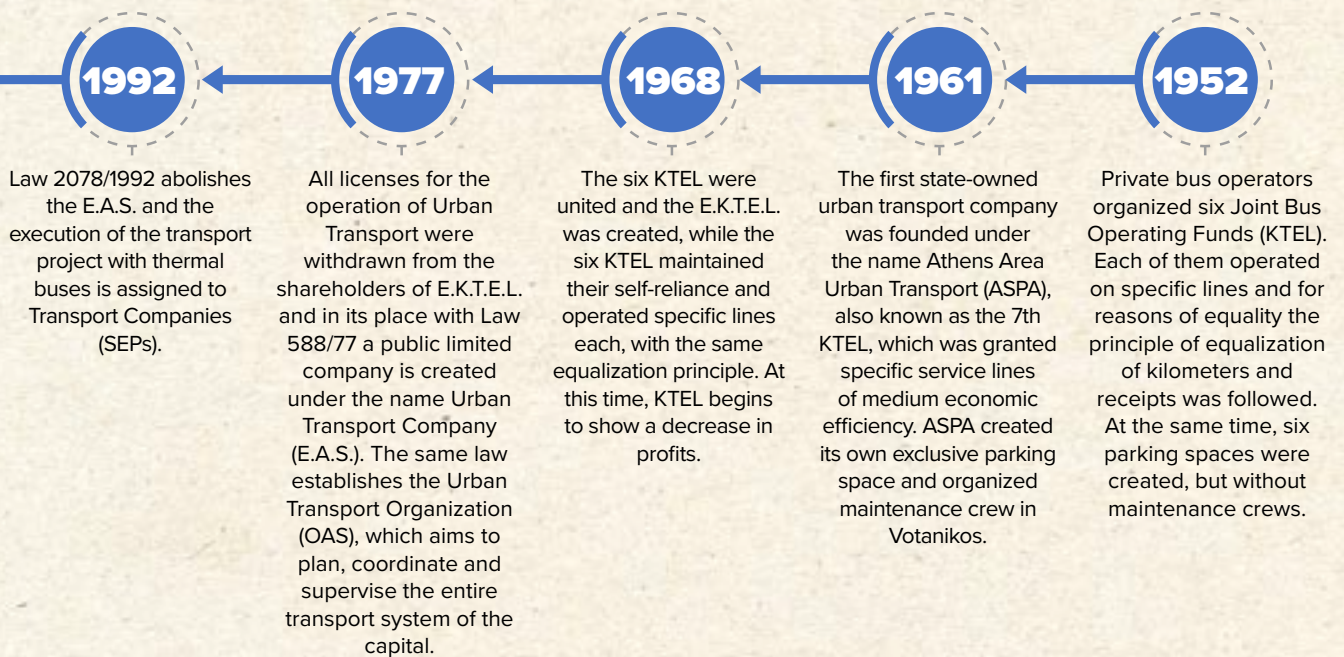
1.3 History and Milestones

OASA

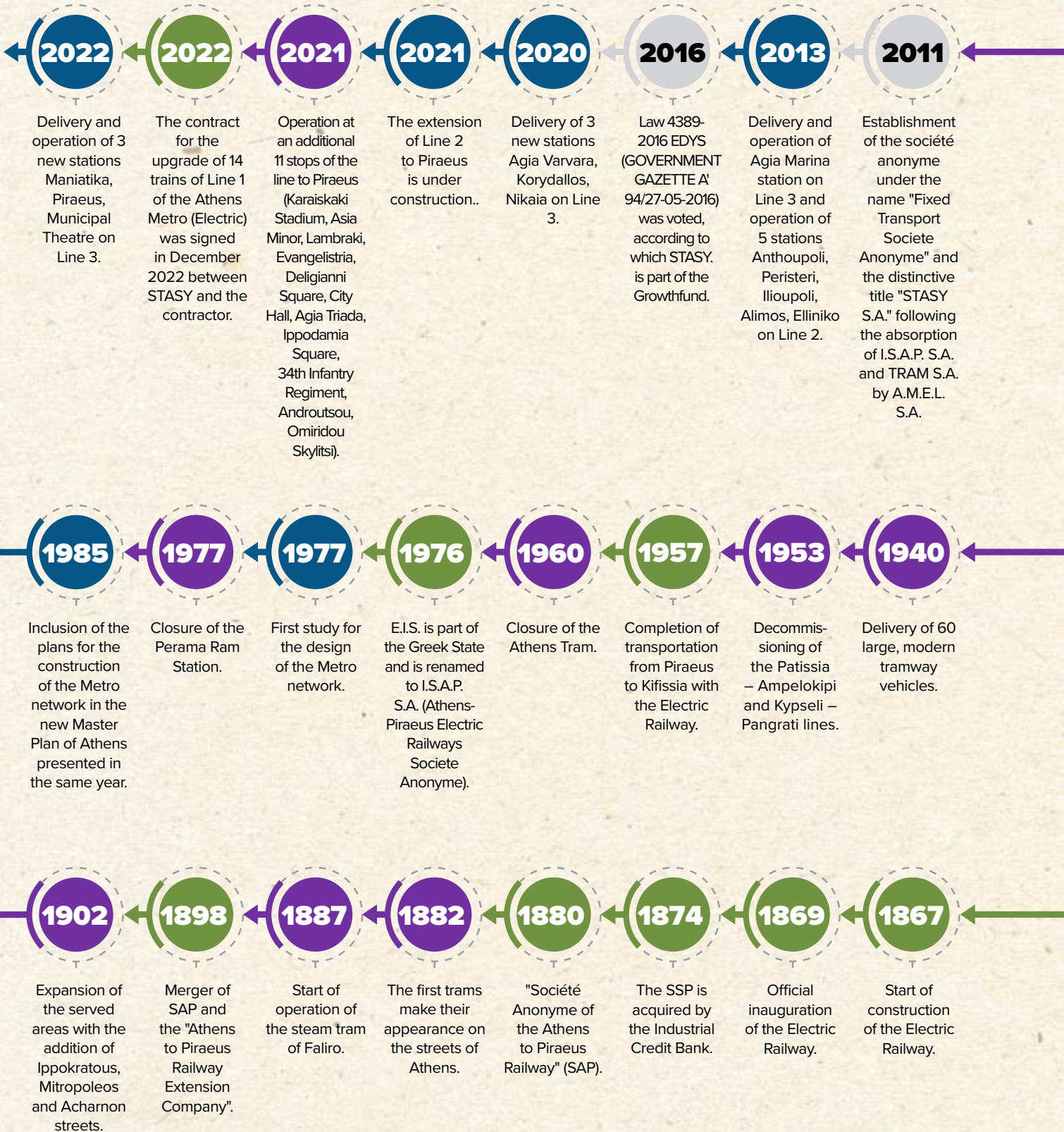


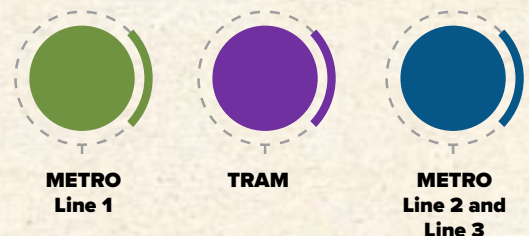
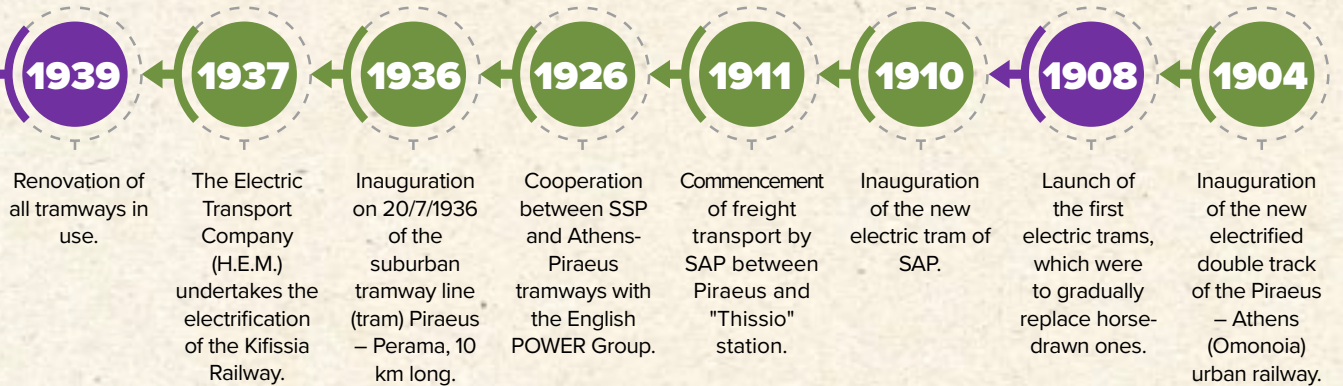
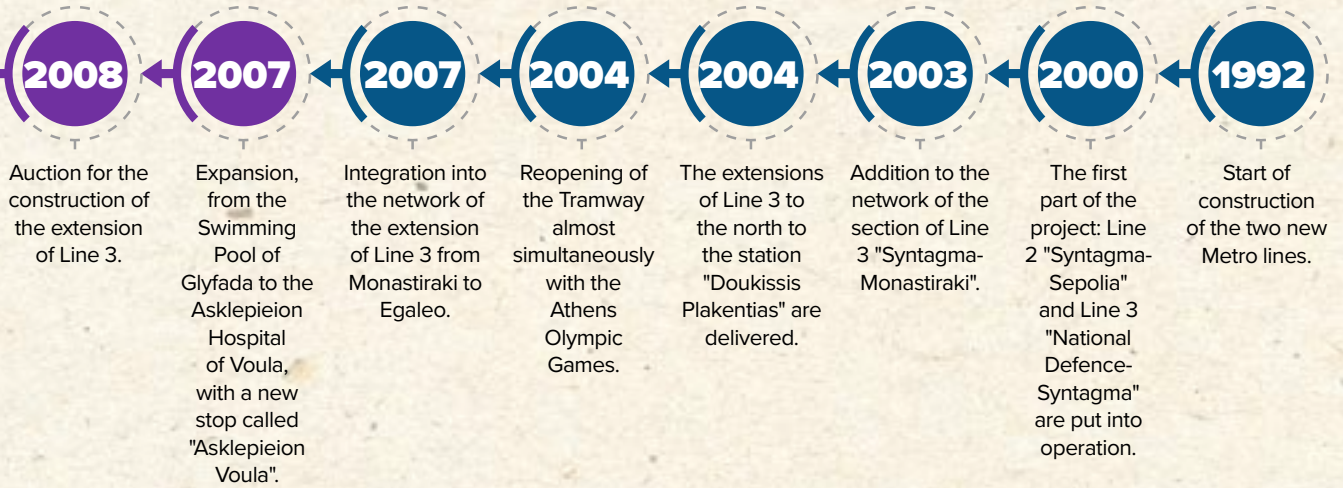
OSY





STASY





1.4 Value Chain and Business Relations

GRI 2-6

Table 2: Activities and business relationships in the Group's value chain			
	Upstream	Athens Transport Group Activities	Downstream
OASA S.A.	<ul style="list-style-type: none"> • Governance Bodies and Independent Authorities¹ • Local government • Manufacturers • Security and cleaning services • Suppliers of equipment, raw materials and materials • Utility providers 	Transportation Planning & Development	<ul style="list-style-type: none"> • Passengers • Subsidiaries
OSY S.A.	<ul style="list-style-type: none"> • Governance Bodies and Independent Authorities¹ • Subcontractors • Security and cleaning services • Suppliers of equipment, raw materials and materials • Utility providers • Fuel suppliers for operation and maintenance purposes 	Implementation of the public transport project by land roads, within the boundaries of the Attica Region (OSY)	<ul style="list-style-type: none"> • Local communities • Passengers
STASY S.A.	<ul style="list-style-type: none"> • Governance Bodies and Independent Authorities¹ • Subcontractors • Security and cleaning services • Suppliers of equipment, raw materials and materials • Utility providers • Fuel suppliers for operation and maintenance purposes 	Implementation of the public transport project with (ground and underground) means of fixed track within the boundaries of the Attica Region (STASY)	<ul style="list-style-type: none"> • Local communities • Retailers • Passengers • Shop tenants • Users of infrastructure (embarkation stations) • Parking services • Taxi services

Service Modernization and Digital Transformation

Transportation planning and monitoring of its implementation is a main activity for OASA, which organizes the network of public transport, including buses, trolleybuses, trams and metro, in a way that ensures effective and efficient mobility. The Group's transportation activities during 2023 focused on three main directions:

- The first direction concerns the upgrading of the transport operation and the passenger experience, in order for public transport to regain the trust of passengers.
- The second direction concerns the reduction of the environmental footprint and alignment with the Green Deal, through the promotion of sustainable urban mobility through actions such as the replacement of the group's light vehicles with low or zero emission vehicles.
- The third direction concerns the actions for the drafting of the Strategic Plan of Urban Transport of Athens, i.e. the program of development studies required for the formulation of the medium-long term General Plan for the Development of Transport of Attica.

¹ Ministry of Labour and Social Security, Ministry of Infrastructure and Transport, Ministry of Health and Ministry of National Economy and Finance.

Implementation of the public transport project by land roads, within the boundaries of the Attica Region (OSY)

Purpose of OSY is the production of the transport project, with the responsibility for the execution of the public transport project by land road means, within the boundaries of the Region of Attica, as defined in Law 3852/2010, except for the islands. The transport network of thermal buses has an area of about 3,951 km and electric vehicles about 370 km out of a total of 4,321 km and is one of the largest in Europe.

Implementation of the public transport project with means of fixed track within the boundaries of the Attica Region (STASY)

STASY has as its main responsibility the execution of the transport project within the boundaries of the Region of Attica for the service of passengers, with the terrestrial and underground fixed-track transportation means. Its primary goal is to save resources through the creation of economies of scale and, in terms of the transport dimension, the necessary complementarity of fixed-track transportation means, so that they can be established in the consciousness of the citizens of the Basin and the visitors of the city, as their first choice for their transportation. The main strategic choice of the company is the continuous recognition and response to the needs of the traveling public.

Assignment of Transportation Project to KTEL

Due to the particular circumstances shaped by the COVID-19 pandemic in 2020, it became necessary to reorganize the frequency of transport services and to take emergency measures for the provision of the transport service, with high quality features and specifications. For the above reasons, as of October 2020² KTEL was assigned the execution of urban and special local routes, regular road passenger transport in the Region of Attica (area of responsibility of OASA).

This cooperation serves objectives of overriding public interest, which consists in the need to ensure the uninterrupted, continuous and uninterrupted provision of the public urban transport service to every potential passenger under OASA's area of responsibility.

² In the framework of the 108/2020 contract "Assignment of urban and special local routes in the area of responsibility of OASA" (SAA: ΩAZN46ΨXX3-H06) which expired on 6.10.2022 and on 6.12.22 the 96/2022 contract for the continuation of the cooperation was signed.

1.5 Memberships and Collaborations

GRI 2-28

At Athens Transport Group, we firmly believe that strong networks and partnerships are crucial to achieving our vision and mission. The companies within the Athens Transport Group (OASA, OSY, STASY) are committed to fostering an innovative mindset for the continuous enhancement of our services. We actively monitor and participate in International Associations, Stakeholder Consultation Committees, and research and development (R&D) programs aimed at designing, developing, and providing innovative services to our passengers.

Leveraging international experience, stakeholder consultation, and research synergies are top priorities for OASA. These efforts add value, contribute to the pillars of Environment, Society, and Governance (ESG), and underscore our social role. They also promote extroversion, help develop strategic partnerships at both European and international levels, and strengthen our human resources by enhancing their knowledge and skills through the exchange of experiences, know-how, and best practices. In this context, the following participations and collaborations of OASA stand out:

- International Association of Public Transport (UITP).
- EBRT2030 (European Bus Rapid transit of 2030: electrified, automated, connected).
- European Metropolitan Transport Authorities (EMTA).
- Standing Committee on Issues of People with Disabilities of the Ministry of Infrastructure and Transport.
- IP4MAAS: SHIFT2RAIL - Innovation Programme 4 to support the deployment of mobility as a service (2020-2023).
- FRONTIER (Next generation traffic management for empowering CAVs integration, cross-stakeholders collaboration and proactive multi-modal network optimization).
- CONDUCTOR (Fleet and traffic management systems for conducting future cooperative mobility).
- PISTIS (Promoting and Incentivising Federated, Trusted, and Fair Sharing and Trading of Interoperable Data Assets).
- Participation in the Board of Directors of the Panos Mylonas Road Safety Institute.
- Participation in the Digital Transformation Executive Network of the Digital Transformation Bible 2020-2025 of the Ministry of Digital Governance.
- Participation in the Joint Digital Transformation Cooperation Group of the Group's companies, which aims to design joint actions and projects such as Group ERP, Preparation of a Strategic Plan for the Exploitation of New Technologies within the Group (Group Digital Strategy).
- Participation in the Energy Competence Center (E.K.I P.C.), which is an important milestone and a practical proof of the Group's commitment to undertake policies and actions aimed at implementing a holistic sustainable development strategy, in order to achieve greenhouse gas emission reduction targets and utilize new technologies and smart applications that will enhance the Group's efforts for sustainable urban mobility.

It is worth noting that the synergies developed by OASA, in addition to the implementation of ESG priorities and the enhancement of extroversion, through its self-determination to scientific teams, generate revenue, proving that the participants in these programs recognize in OASA a consistent and capable partner.



2. Approach to Sustainable Development

Approach to Sustainable Development

As part of Athens Transport Group's commitment to sustainable development, we adopt initiatives and actions that reflect an integrated approach towards the green transition. This holistic strategy not only enhances sustainable mobility, environmental sensitivity, and social responsibility but also contributes to achieving the United Nations Sustainable Development Goals (SDGs).

The Group embraces the European Green Deal and develops initiatives related to the circular economy, green mobility, clean technologies, building renovation and renewable energy sources (RES), energy efficiency, and nature protection. In this context, we continuously strive to reduce our carbon footprint by integrating new vehicles with anti-pollution technology and zero emissions, and by upgrading energy efficiency in our facilities. Additionally, in collaboration with municipalities, we create Sustainable Urban Mobility Plans to promote sustainable modes of transport aimed at reducing greenhouse gas emissions.

In addition, the companies of the Athens Transport Group adhere to strict safety standards, complying with applicable legislation for road vehicles (buses and trolleybuses) and OSY facilities. Concurrently, the companies support continuous education and training for employees, enhancing their professional skills and overall personal development and empowerment. Preventative periodic medical checks are also conducted to ensure the suitability of mobility personnel.

The Group contributes to economic growth by providing high-quality mobility services, improving quality of life, and enhancing culture and society. It implements actions that cultivate human resources, foster a sense of volunteerism and social contribution, and support humanitarian initiatives. By doing so, the Group contributes to the work of recognized social institutions and organizations, always focusing on social contribution and promoting the historical, cultural, and folklore diversity of the country.

ESG Goals and Priorities

Presented below are the ESG Priorities (strategic goals) of the Growthfund for the Athens Transport Group until the year 2026, using 2021 as a base year. Based on the ESG (Environmental, Social and Governance) pillars, the Group pursues the following:

- CO₂ emissions estimation & roadmap for alignment with the European Green Deal.
- Improvement of accessibility to public transport in Athens.
- Enhancing transparency on ESG issues.

Table 3: ESG priorities of the Group for the period 2022-2026

Environment			
Implementation Year	ESG Priorities	Response	Status
2024-2026	Upgrade of 14 Line 1 trains and reconstruction of 2 traction yards to recover energy through electro-coupling	Replacement of part of the equipment of the 8th delivery trains because it can no longer be maintained and upgrading of some systems to make the trains more modern and passenger friendly. In particular, it concerns the purchase of trains and the replacement of substations.	Ongoing
2024-2026	Refurbishment of 12 traction substations on line 1	Replacement of equipment in 12 substations of the Line, with new, modern technology equipment, aiming at saving energy and reducing the environmental footprint of STASY. This project will be implemented in stages. It involves the replacement of 2-3 substations every 3 years, while the parts of the substations that are removed will yield spare parts for the others.	Ongoing

2024	Carbon footprint reduction -3%		Ongoing
2024	<p>Use AI & ML* in preventive maintenance system for buses and trolleybuses</p> <ul style="list-style-type: none"> • Design, development and operation of an integrated preventive maintenance system with AI & ML technology in buses and trolleybuses. • With an average of more than 220 kilometres per vehicle per day, the system will significantly reduce CO₂ emissions. <p><i>*AI & ML: Artificial Intelligence, Machine Learning</i></p>	<ul style="list-style-type: none"> • Removal from circulation of old technology diesel vehicles (EURO1). • OSY is in the process of procuring 140 new electric buses and expects to receive them in 2024. • Holding of an open tender for the award of the suburban bus lines of Attica with 211 vehicles (2024-2025). 	Ongoing
2024	<p>Transition to electrification</p> <ul style="list-style-type: none"> • New electric buses (OSY). <ul style="list-style-type: none"> - Pilot evaluation of electric buses. - Transitional plan of operation, facilities & human resources. - Change management plan. • Installation of car charging stations in STASY's parking lots and depots. 		Ongoing
2022-2025	Reduction of energy footprint in offices	<ul style="list-style-type: none"> • Reduction of the energy footprint of specific facilities after the changes they will undergo to accept (parking, maintenance, charging) electric buses. • Energy upgrade of OSY's buildings (e.g. replacement of depot lighting with LED systems, treatment of liquid waste from workshops, lubricators, washing machines). • Energy upgrade of STASY's stations and facilities through the replacement of lighting with LED systems and replacement of Barco mimic panel incandescent units at ATS (Syntagma Station). 	Ongoing
2022-2024	<p>New low-emission vehicles</p> <p>Continuation of the tender procedures for the supply of new vehicles with anti-pollution technology (Compressed Natural Gas - CNG, electric).</p>	<p>Evaluation of tender offers of the Ministry of Transport and Infrastructure. It has been declared the temporary contractor for the 200 CNG and the signing of the contract for the 100 CNG has been approved by the Court of Auditors.</p>	Ongoing

2022-2024	Consumption of natural resources	<ul style="list-style-type: none"> • Data collection and specification for the procurement of new bus washes, which will use less water and manage waste with environmentally friendly systems. • Initiation of the process of obtaining ISO 14001 certification (Environmental Management). The pre-audit has been scheduled and then OSY will take appropriate adaptation actions. 	Ongoing
2022-2024	Energy, water and waste management <ul style="list-style-type: none"> • Energy upgrade of facilities. • Installation of photovoltaic systems in the depots of OSY. • Further establishment of good practices in waste management (e.g. fleet recycling). • Wastewater management facilities at OSY depots. • Responsible water consumption. 	<ul style="list-style-type: none"> • Installed photovoltaic panels by OSY at the facilities of Petros Ralli, while it has signed contracts with contractors for the optimization of wastewater and waste management. • STASY's photovoltaic system with a capacity 970.83 kWp and an expected annual production of 1,400 MWh. It is expected to cover 36% of the depot's energy needs and the capital depreciation is determined at 4 years. 	Ongoing
2022-2024	Environmental Management System Certification <ul style="list-style-type: none"> • Development, implementation and acquisition of environmental certificate (e.g., ISO 14001, EMAS). • In 2020, OASA prepared a CO₂ emissions report. • Establishment of the above report as a tool for measuring and making relevant business decisions. 	<ul style="list-style-type: none"> • OSY has initiated the procedures for the certification of the A/C of Anthousa according to the ISO 14001 Standard. • ISO 14001 certification for a STASY depot and implementation of training to the Standard lasting 6 weeks. 	Ongoing
2022-2024	Rolling stock reduction and braking power recovery on Line 1 <ul style="list-style-type: none"> • 12% less energy consumption than refurbished rolling stock. • Energy savings of 15% through power regeneration during braking. 	<p>Submission of the studies and their approval by STASY, and the process of ordering the equipment from the contractor is in progress.</p>	Ongoing

Society			
Implementation Year	ESG Priorities	Response	Status
2023-2024	Psychological support programs aimed at strengthening mental and emotional well-being	<ul style="list-style-type: none"> • STASY has implemented this since September 2023, including a 24-hour counseling hotline for employees and their family members. • Memorandum of cooperation from STASY with the Athens Employee Day Center "THALPOS", where employees undertake FREE personalized mental health services through individual sessions (2024). 	Ongoing
2023-2024	Digital platform training and learning <ul style="list-style-type: none"> • Digital platform for the implementation of the internal and external training and learning programs of STASY. • Training for 3,000 employees (drivers and/or other customer service staff) on accessibility. 	A training program for first aid was implemented for all employees, through the online E-Learning platform of STASY. The program is combined with practical training and leads to obtaining a 5-year certificate.	Ongoing
2023 (Ongoing process)	Actions for the Improvement of the Working Climate (STASY)	<ul style="list-style-type: none"> • Actions for Mental-Emotional Wellbeing. • Actions for Social Wellbeing aimed at strengthening the Corporate Image. • Actions for Physical Wellbeing. • Actions for Financial Wellbeing. • Actions for Transparency and Respect for Personality. <p><i>More information on actions to improve the working climate is available in Section 4.1 Working Practices.</i></p>	Completed
2023-2024 (Ongoing process)	Human Resources Development / Employees Training Continuation of training programs for all specialties, for all staff, through the online platform OSY ACADEMY.	<ul style="list-style-type: none"> • OSY, in its effort for continuous training of its staff and its maximum utilization, has intensified the provided training programs (see face-to-face seminars, OSY Academy etc.). • Development of the platform "STASY GNOSIS" – customer service employee training guide. 	Ongoing

2023-2024	<p>Improving accessibility by upgrading and extending telematics</p> <p>Upgrade of OASA's website to improve accessibility for people with disabilities.</p>	<ul style="list-style-type: none"> • The upgrade of the OASA website has been completed in order to display the content and information in a way that facilitates access by people with disabilities. • OSY participates in the action "Every stop, smart stop", whose goal is to place a QR Code at each stop and will refer to the telematics application of OASA, with LIVE data regarding the lines and routes of interest. In addition, it is expected to highlight vehicles that can serve disabled people with color differentiation in the telematics application. • Development of an electronic application on STASY's website. (www.stasy.gr) to inform obstructed passengers about possible technical failures in lifts of the Metro network. 	Completed
2023 (Ongoing process)	<p>Supporting Society</p>	<ul style="list-style-type: none"> • Continuation of programs for the provision of OSY's computer equipment to school units. • New project for the measurement of air quality inside OSY's buses. • OSY's and STASY's participation in social programs in the form of transportation services at major sporting and social events. • Continuation of reduced fare programs for vulnerable groups and free transportation to people with disabilities (with mobility problems), through the special service of OSY. • Installation of equipment for the free provision of internet access services (WiFi) within OSY's and STASY's vehicles. • OSY's participation in providing data on the special platform (O2HUB of HCAP) that aims at gathering information to society. • OSY's and STASY's participation in an online reporting platform in the context of Compliance. • Provision of personal hygiene items for protection against Covid-19 in schools, institutions, flood patients, etc. 	Ongoing
2023-2025	<p>Integration of new staff</p>	<ul style="list-style-type: none"> • Continuation of the recruitment process by the Public Employment Service (D.Y.P.A.) of persons for training at OSY's and STASY's premises. • Recruitment planning required for the whole Group. 	Ongoing

2023	Organizational Restructuring	<ul style="list-style-type: none"> • Initiation of the process of obtaining ISO 45001 certification (Personnel Health and Safety). OSY's pre-audit has been scheduled and the Company will enforce any required actions that arise. • Initiation of the process of obtaining ISO 45001 certification (Personnel Health and Safety) for the Eleonas depot of Line 3. • Continuation of OSY's Family Benefits programs (camps for the children of employees, incapacitated motor or intellectual children, students in Higher or Higher Education Institutions, crèches, etc.) to employees. • Continuation of benefit programs, in the form of gift certificates, during the holiday season. • Creation of a Regulatory Compliance Framework for OSY. • Collective Labour Agreement in all Group companies. 	Ongoing
2022-2024	Accessibility improvement program at selected Metro stations Implementation of an action plan in pilot plants, followed by widespread implementation in all.	<ul style="list-style-type: none"> • The upgrade of the metro and metro station in Monastiraki has been completed, making it fully accessible for people with disabilities. • Completion of a study of improvement interventions for the access of disabled people to the stations of Line 1 (pilot application at "Kallithea" station). • Testing of a new type of entry-exit ramp on Line 1 platforms in collaboration with the National Federation of Physically Handicapped People. • Pilot project of electronic universal accessibility for people with disabilities & people with disabilities that will be implemented at the ACROPLOIS metro station. • Development of an application for visualization scenarios and enhancing accessibility for people with hearing impairments. 	Ongoing
2022-2023	Continuous digital upgrades to online recharging of fare products for remote transactions	<ul style="list-style-type: none"> • Completion of modification of the Automatic Fare Collection System (AFCS) and provision of online ticket purchase. 	Completed
2022-2023	Employee engagement measurement survey	<ul style="list-style-type: none"> • Implementation of research in STASY for the years 2022 and 2023 (where the company achieved incremental results of the confidence index) and taking actions. 	Completed
2022-2023	Preparation of the Board of Directors and Senior Management of the Group and its subsidiaries for the implementation of ESG priorities	<ul style="list-style-type: none"> • Attendance of recognized training programs as well as trainings organized by Growthfund for its subsidiaries. • Training of Compliance Officers. • Training of Growthfund subsidiaries on ESG issues. 	Completed

Governance

Implementation Year	ESG Priorities	Response	Status
2024-2026	Development of a new ERP system	It concerns the supply, installation and operation of the Group's new ERP system, in order to better manage its resources. The order of purchase and integration of the modules is: finance > logistics > HR.	Ongoing
2024	Installation of a tamper detection system	Installation of a modern tampering detection system, alarm/paging generation, as well as a signal reception center, in all depots and train depositories (STASY).	Ongoing
2023-2024	Risk Assessment Conduct risk assessment and management.	Appointment of a Risk Manager in each of the three companies of the Athens Transport Group. Completion of the process of risk identification and assessment and the preparation of a Risk Register and action plan for each company. Both the Risk Registers and the Action Plans have been approved by the Board of Directors.	Ongoing
2023	Transparency & Disclosures <ul style="list-style-type: none"> • Corporate Governance Statement in the Annual Results Report. • Prepare sustainability disclosures based on appropriate standards (e.g. UN SDGs). 	Preparation of a Sustainable Development Report for the period 1.1.2023-31.12.2023 at group level.	Completed
2022-2024	Embrace the new Corporate Governance Code for listed companies, to the extent feasible. Implementation of Circular No. 60 of the Hellenic Capital Market Commission for the minimum 25% representation of women on the Board of Directors, in the context of harmonization with the standards of listed companies as much as possible.	Establishment of a Committee for the Nomination of Candidate Members of the Board of Directors of subsidiary companies. The companies OASA and STASY have appointed new Board members, in accordance with Growthfund's requirement.	Completed

2022-2024	Monitoring	Quarterly reports of the Compliance Officer to the Board of Directors and establishment of a communication framework with Growthfund.	Ongoing
2022-2026	Improving processes	<ul style="list-style-type: none"> • Within 2023, the full integration of OSY and STASY users in Cloud services (Office 365) was completed. • Preparation for the inclusion of OSY staff in the digital work card ERGANI II. • Development of quality control system specifications for preventive vehicle maintenance in OSY. • Implementation of the policy of entering into transactions with related Parties (third parties) by OSY. • Full integration in mydata of OSY and STASY. • Full operation of the fuel management and control system by OSY (PROMIS). • Improvement of the tender procedures by the Procurement Directorate, in order to reduce the completion time from 9-12 months to 4-7 months for large tenders by the OSY. • Integrating the approval flow of digital signatures in procurement processes into the document management system (DMS). • Renewal of the overall network infrastructure due to equipment obsolescence and upgrading of the interconnection speed both in terms of user access to services and server interconnection (STASY). • Upgrading of Microsoft licenses for the company's servers (STASY). • Upgrade the IVU.rail system and extend the licenses to the entire organization (STASY). • Automation of financial services through an Information System and their integration into the Digital Portal gov.gr (STASY). • Improvement of the content of the corporate website/ Improvement of the station signage in Greek and English language/ Printing of maps (z-cards) with the network of STASY/ Micro -app lifts (STASY). 	Ongoing
2022-2024	Digital transformation	<ul style="list-style-type: none"> • Supply of 150 state-of-the-art computers for OSY. • Supply of 120 desktop computers and 40 laptops for STASY. • The distribution of 3,500 smart phones with internet access through the SYZEFXIS II program (integration of traffic personnel) has been completed. • Initiation of Cyber Security awareness and information actions. • Creation of digital transformation indicators (they concern the recording of existing technologies, the rate of introduction / utilization of new technologies (AI, EMV, Automation), technological tools (Data Lake, ERP), as well as digital skills and training needs of companies). • Digitization of the technical file and centralized management of all information, for the economic and efficient maintenance of the equipment of STASY, as well as the implementation of new projects. • Upgrading of central servers, data storage systems, security systems, network infrastructure and workstations. It is a process that takes place over time (STASY). • Completed the creation of infrastructure for immediate disaster recovery and business continuity (Disaster Recovery) of the 3 IT Centers of STASY. • Possibility for violators to pay the fine through Bank or online platform or at the Post Office (STASY). 	Ongoing

2022-2023	Complaints Procedure	Implementation of Growthfund's Whistleblowing Policy and the "Safevoice" platform.	Completed
2021-2026	Business Ethics <ul style="list-style-type: none"> • Establish an effective ethics & compliance program, new policies and procedures, including the policies provided by Growthfund. • Training on Business Ethics & Regulatory Compliance. 	<ul style="list-style-type: none"> • OASA has established and posted on its website the Code of Ethics & Professional Conduct, as well as the policies: Reporting, Anti-Corruption & Bribery and Against Violence & Harassment at Work. In addition, it has established policies: Gifts & Hospitality, Sponsorships & Donations, Regarding Business Ethics & Compliance training. In 2022 Manager training was completed and subsequently in 2023, that of the department heads. • OSY has posted and communicated to staff the compliance policy and code of conduct. The same is expected to happen with other policies, as defined by Growthfund. Concurrently, OSY has already completed seminars for managers on Business Ethics & Regulatory Compliance. • URBAN RAIL has posted its Policies on its internal website, in the field "Regulatory Compliance". It has completed all its executive training and has started its employees' in-person training. The trainings will also take place through an online platform. • Compliance with the GDPR Directive, upgrading the mechanisms of prevention and identification of network risks and attacks in order to evaluate and redesign the infrastructure of STASY. 	Ongoing
2021-2024	Third-party control	<ul style="list-style-type: none"> • Implementation of a process for all partners and suppliers (based on a Growthfund process). 	Ongoing
2021-2023	Independence of the Board of Directors	<ul style="list-style-type: none"> • Implementation of Law 4706/2020 regarding independence. • Distinction of roles and responsibilities: Non-executive position of Chairman of the BoD. • All members of the Board of Directors sign a declaration of absence of conflict of interest (and/or declaration of independence accordingly), in a form provided by Growthfund. 	Completed

2.1 Management of Sustainable Development Issues

GRI 2-12 (a, b-i), GRI 2-13 (a)

The supervision and management of sustainable development issues, including risks and opportunities, are conducted at various levels. The Boards of Directors (BoD) of the Athens Transport Group companies approve the Group's Business Plan, which encompasses the Sustainable Strategy and individual actions related to the pillars of sustainable development.

The Boards of Directors are regularly informed about the results of studies and actions related to these pillars, such as the carbon footprint study and the passenger satisfaction study. In addition to the Board members, senior management executives and employees participate in established collaboration groups, such as the Corporate Transformation Actions Team and the Passenger Experience Team. These groups undertake sustainable development actions, including studies to manage the Group's impact on both the external environment (e.g., environmental footprint assessment, roadmap for alignment with the Green Deal, passenger satisfaction study) and the internal environment (e.g., employee satisfaction survey).

Furthermore, senior management executives consult with stakeholder groups and relay their views to the respective Boards of Directors. These insights are considered when drafting policies and making decisions that affect stakeholder groups on a case-by-case basis.

In the context of assessing and managing sustainable development risks, OASA, STASY, and OSY have identified, managed, and monitored risks in accordance with the Risk Management Policy and the relevant methodology provided by Growthfund and applied by each subsidiary.

Every ESG risk has been standardized and defined as those that threaten ecosystems, such as water quality degradation, pollutants, air pollution, and risks arising from unacceptable practices like workplace discrimination, poor or dangerous working conditions, harassment, human rights violations, and occupational accidents.

Risks are assessed and calibrated based on their probability of occurrence, their impact on the Group, and the adequacy of the Group's control mechanisms. For each risk, the Group calibrates individual safeguards, describes the correlation of each risk with the operations of the Group's companies, identifies possible events it may cause, outlines the risk factors that create it, and records historical events related to it.

At the governance level, the internal auditor identifies sustainable development risks and communicates them to the Board of Directors of each company through the Audit Committee. The Boards of Directors validate the internal auditor's report and take measures to mitigate risks. Additionally, action plans and measures are defined to address risks, specifying those responsible for their preparation, monitoring, management, and response. Key Risk Indicators (KPIs) and response strategies, along with monitoring limits, are recorded in the Risk Registers of each company.

2.2 Stakeholder involvement

GRI 2-29

Athens Transport Group seeks to maintain continuous and effective communication with all interested parties in order to record any concerns and needs that arise, as well as to communicate information about its activities. Regular consultation, communication and dialogue with stakeholders aims to better understand their interests, expectations and needs, as well as to identify issues related to sustainable development that need to be resolved by the Group.

The term stakeholders is defined as individuals or groups of individuals whose interests are or may be affected by the Group's activities. For the Group, the main stakeholder categories are the following:

- Senior Management
- Shareholders
- Employees
- Governance Bodies and Independent Authorities
- Suppliers and Partners
- Business Community and Sectoral Bodies
- Passengers
- Local Communities
- Academic and Research Community
- NGO
- Mass Media

The companies of the Athens Transport Group aim at a constructive and systematic dialogue with all stakeholders, to develop, shape and maintain long-term relationships of trust and transparency. The following table prioritizes and categorizes stakeholders according to their impact and influence on the operations of the Athens Transport Group, while the methods of consultation and the frequency of consultation with them are recorded. In order to identify the Group's stakeholders, a detailed mapping was carried out as part of the Double Materiality Analysis process.

Table 4: Group stakeholder categories and communication means and frequency

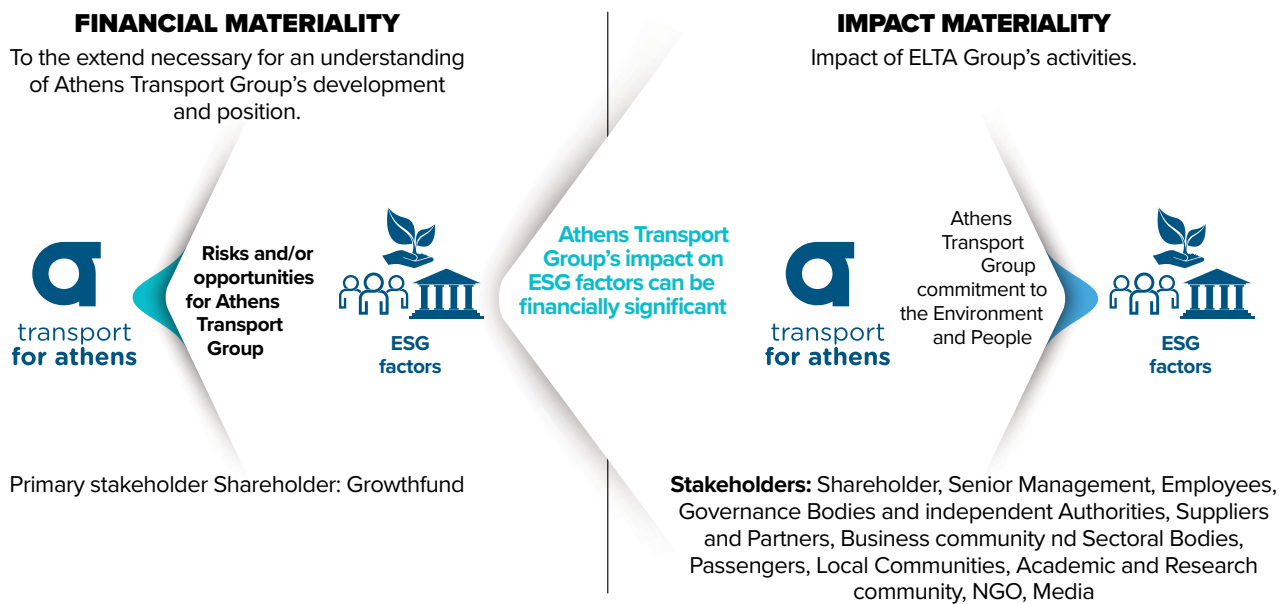
Stakeholder Group	Means of Communication	Communication Frequency
Senior Management (Management of STASY and OSY)	<ul style="list-style-type: none"> • Telephone contact • Email correspondence • Meetings 	Continuous
Shareholders	<ul style="list-style-type: none"> • Monthly Report to Growthfund • Email correspondence • Meetings 	Continuous
Employees	<ul style="list-style-type: none"> • Newsletter • Employee Satisfaction Survey • Meetings • Email correspondence • Message platform for the direct information of employees on their mobile phone (STASY) 	Continuous
Governance Bodies and Independent Authorities	<ul style="list-style-type: none"> • Email correspondence • Meetings • Letters • Reports (upon request) 	Monthly
Suppliers and Partners	<ul style="list-style-type: none"> • Meetings • Email correspondence 	Weekly
Business Community and Sectoral Bodies	<ul style="list-style-type: none"> • Email correspondence • Meetings • Participation in forums and conferences • Events 	Where applicable
Passengers	<ul style="list-style-type: none"> • Audience line 11185 • Chatbot, submission of complaints through OASA website • Questionnaires (satisfaction survey) 	Weekday
Local Communities	<ul style="list-style-type: none"> • Email correspondence • Meetings 	Monthly and on a case-by-case basis
Academic and Research Community	<ul style="list-style-type: none"> • Email correspondence • Meetings / Cooperation in the framework of Research Projects 	Monthly and on a case-by-case basis
NGO	<ul style="list-style-type: none"> • Email correspondence • Meetings • Letters • Press releases 	Monthly and on a case-by-case basis
Media	<ul style="list-style-type: none"> • Press releases • Linage • Interviews 	Weekly

2.3 Double Materiality Analysis

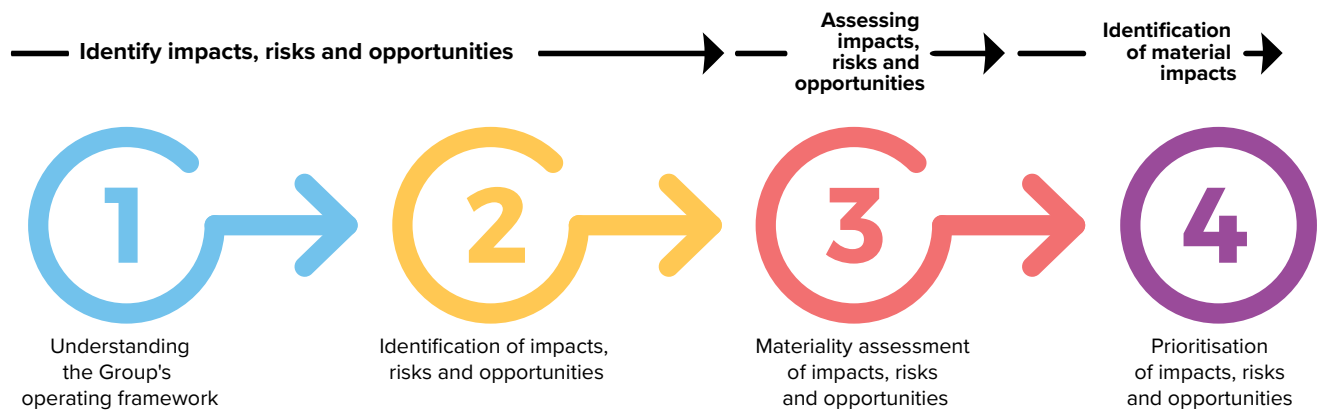
GRI 3-1

In 2023 (for the purposes of the Sustainable Development Report 2022), Athens Transport Group carried out for the first time an inside-out & outside-in Materiality Analysis following the GRI Standards 2021 and considering the European Sustainable Development Reporting Standards (ESRSs). The concept of double materiality includes the company’s environmental, social and economic impacts, including its impact on human rights (inside-out); as well as the financial risks and opportunities arising from the environment and society to the company (outside-in), thus affecting its business value, i.e., the economic value created by its activities, in the short, medium and long term level.

Chart 2: Double Materiality Analysis



The Double Materiality Analysis was conducted in four phases:



Phase 1 – Understanding the operating framework

- **Business model overview (internal environment) and external environment:** Understanding the business model and business relationships, as well as the external environment, through an overview of available relevant material.
- **Understanding stakeholders:** Understanding key stakeholders through an overview of available relevant materials.

Phase 2 – Identification of impacts, risks and opportunities

- **Identification of positive and negative (actual and potential) impacts, risks and opportunities on the economy, environment and society, including human rights:** As they emerged from its operation and value chain, while industry standards were examined in order to ensure that all possible aspects impacting or likely to impact the Group are taken into account.

Phase 3 – Materiality assessment of impacts, risks and opportunities

- **The evaluation and prioritization of the identified impacts, risks and opportunities was carried out based on their severity, as well as their likelihood of occurrence, following the Company's risk assessment methodology.** This process involved experienced internal stakeholders, depending on the theme of the ESRS standards.

Criteria for assessing positive (actual and potential) effects:

- The scale.
- The scope.
- The probability of them happening (likelihood).

Criteria for assessing negative (actual and potential) effects:

- All of the above.
- The irremediable character.

Risk and opportunity assessment criteria:

The identified risks and opportunities were considered on the basis of whether they may affect the Group's performance, financial condition, access to capital and costs. This assessment also considered the potential magnitude of the financial effects of the risks and opportunities concerned in relation to their likelihood of occurrence in the short, medium and long term.

Phase 4 – Prioritisation of impacts, risks and opportunities

GRI 2-14

The Company then assessed the individual issues using appropriate thresholds in accordance with the risk assessment methodology already used as a Company, from which the list of material impacts, risks and opportunities was derived. This consolidated information was validated by senior management to ensure completeness and accuracy of the material topics identified.

Identified Impacts, Risks and Opportunities

During the dual-materiality analysis process, 17 actual positive, 7 actual negative and 16 potential adverse environmental, social, and economic impacts were identified, as well as 25 financial risks and 21 financial opportunities, presented in more detail in Table 5 below.

Table 5: Athens Transport Group Double Materiality Analysis						
THEMATIC UNIT	Recognized Topics	Recognized Sub-Topics	Impacts		Financial Risks	Financial Opportunities
			Actual	Potential		
ENVIRONMENT	Climate change	Adaptation to Climate Change			●	●
		Climate Change Mitigation / Energy	+		●	●
	Pollution	Pollution of air		-	●	
		Pollution of water		-	●	
		Pollution of soil		-	●	
	Water and marine resources	Water	+		●	●
			-		●	●
	Biodiversity and ecosystems	Direct impact factors on biodiversity loss (Climate change, Land use change, Pollution, Direct exploitation)	+	-	●	●
	Circular economy	Resource inputs, including resource use	+		●	●
			-		●	●
		Waste	+		●	●
			-		●	●
	SOCIETY	Own workforce ³	Working conditions (working time, adequate wages)	+	-	●
Freedom of association and collective bargaining			+	-	●	●
Health and safety at work / Work-life balance			+		●	●
			-		●	●
Diversity, equal treatment and equal opportunities for all			+	-	●	●
Training and skills development			+	-	●	●
Child labour / Forced labour					●	

³ The term "own workforce" includes all employees of the companies of the Athens Transport Group (OASA, OSY and STASY), regardless of hierarchy and operation.

SOCIETY	Workers in the value chain	Working conditions and human rights in the value chain				
	Affected communities	Economic, social and cultural rights of communities, related to land use, security, adequate housing, adequate food, clean water and sanitation				
		Civil and political rights of communities in relation to freedom of expression				
	Special topics	Urban mobility				
	Consumers and end-users	Information-related impacts for consumers and/or customers and/or end-users on privacy, freedom of expression and access to quality information				
		Personal safety of consumers and/or end-users				
		Social inclusion of consumers and/or end-users	Social inclusion of consumers and/or end-users			
	Social inclusion of consumers and/or end-users	Responsible marketing practices				
GOVERNANCE	Business conduct	Corporate culture / Protection of whistle-blowers / Corruption and bribery				
		Management of supplier relations, including payment practices				

Subsequently, based on the results of the double materiality analysis survey, the following thematic areas of positive and negative (actual and potential) impacts, as well as financial risks and opportunities, were prioritized by the Group's Senior Management as material.

Tables 6 & 7: Prioritized Positive and Negative Impacts

Positive Impacts		
1	Climate Change Mitigation / Energy	A
2	Working conditions <i>(working time, adequate wages)</i>	A
3	Factors of direct impact on biodiversity loss <i>(climate change, land use change, pollution, direct exploitation)</i>	A
4	Waste	A
5	Health and safety at work / Work-life balance	A
6	Personal safety of consumers and/or end-users	A
7	Impacts related to the information available to consumers and/or end-users on privacy, freedom of expression and access to quality information	A
8	Resource inflows, including resource use	A
9	Urban mobility	A

Negative Impacts			
1	Climate Change Mitigation / Energy	A	
2	Pollution of air		P
3	Pollution of soil		P
4	Water pollution		P
5	Factors of direct impact on biodiversity loss (climate change, land use change, pollution, direct exploitation)		P
6	Personal safety of consumers and/or end-users	A	
7	Health and safety at work / Work-life balance	A	
8	Working conditions <i>(working time, adequate wages)</i>		P
9	Freedom of association and collective bargaining		P
10	Training and skills development		P
11	Diversity, equal treatment and equal opportunities for all		P
12	Working conditions and human rights in the value chain		P

A = Actual Impacts & P = Potential Impacts

Tables 8 & 9: Prioritised Risks and Opportunities

Risks	
1	Working conditions <i>(working time, adequate wages)</i>
2	Climate change mitigation / Energy
3	Personal safety of consumers and/or end-users
4	Corporate culture / Whistle-blower protection / Corruption and bribery

Opportunities	
1	Training and skills development
2	Corporate culture / Whistle-blower protection / Corruption and bribery
3	Urban mobility
4	Working conditions <i>(working time, adequate wages)</i>
5	Climate change mitigation / Energy
6	Personal safety of consumers and/or end-users












Material Topics

GRI 3-2

The thematic areas mentioned above were grouped into the following material topics to effectively and comprehensively depict the Group's management approach and performance.

Since there was no change in the business model or activities of the Group's companies in 2023, it was decided not to repeat the double materiality analysis conducted in November 2023 for the 2022 Sustainability Report. Instead, the same material topics were used as the basis for this Report, which has been approved by the management of the Group's companies.

Table 10: Material Topics⁴ of Athens Transport Group

A/A	Material topic	Impact	Risk/Opportunity	UN Sustainable Development Goals
1	Climate change mitigation (including power consumption)	I	R/O	
2	Circular economy (including resource use and waste management)	I		
3	Working conditions and employee development (including working time, wages, training and skills development, freedom of association and collective bargaining, health and safety at work, diversity and equal opportunities)	I	R/O	 
4	Working conditions and human rights in the value chain	I		 
5	Safety of passengers and users	I	R/O	 
6	Customer and user rights and privacy (including customer service, freedom of expression and access to quality information)	I		
7	Sustainable urban mobility (including accessibility to mobility and transport infrastructure)	I		
8	Business ethics (including business culture / Protection of whistle-blowers / Corruption and bribery)		R/O	

I = Materiality of effects, R/O = Financial materiality (Risk/Opportunity)

⁴ Note: Regarding the impact "Direct impact factors on biodiversity loss (Climate change, Land use change, Pollution, Direct exploitation)", the Management considered that it does not constitute a significant impact and was not included in the Sustainable Development Report.

03

Environment



3.1 Climate Change



Material topic: Climate change mitigation

GRI 3-3

Impacts	
Actual	Positive
	From the operation of fixed track means as an alternative use of private cars for transportation within the city and through investments and actions that lead to the reduction of greenhouse gas emissions.
	Negative
	Energy consumption from fossil fuels and greenhouse gas emissions into the atmosphere.
Financial Opportunities	
From the reduction of greenhouse gas emissions and energy savings.	
Financial Risks	
From the cost of energy, or the cost of any requirement to renew equipment and electrify the activities of OSY.	

According to the European Commission's "Climate Action" data, the transport sector is responsible for about one-quarter of pollutant emissions in the European Union and is the main cause of air pollution in cities. The Athens Transport Group plays a crucial role in mitigating climate change, as the use of public transport prevents the movement of approximately 500,000 cars per day. In its first environmental footprint report published in 2021, the Group documented that the "theoretical" removals of emissions are higher than the Group's emissions, indicating a net environmental benefit from its operations.

In this context, the Athens Transport Group implements climate change mitigation actions to reduce emissions from its activities and enhance its environmental profile by promoting the use of public transport. The Group aims to integrate environmental parameters into the decision-making process, identify areas for improvement, and plan targeted actions. Additionally, it seeks to highlight the contribution of public transport to the improvement of the urban environment, thereby taking advantage of opportunities to lower operating costs and avoid financial fines or sanctions for non-compliance with regulatory requirements.

Carbon footprint reduction actions

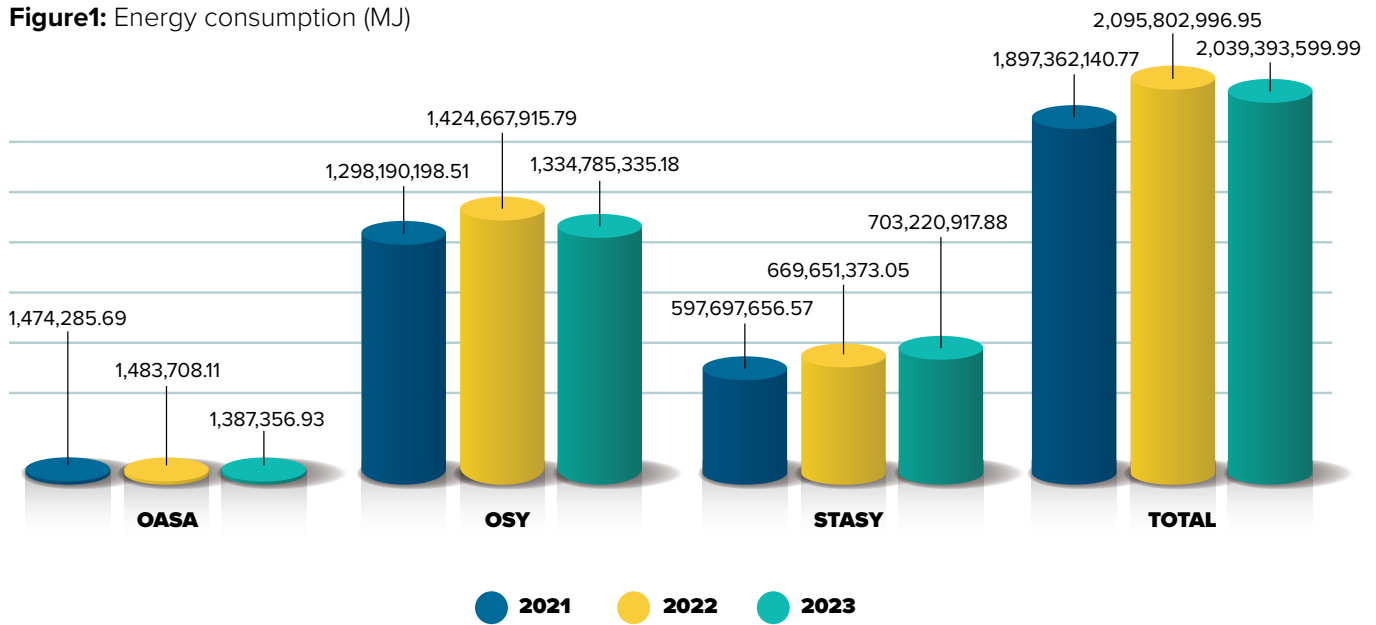
GRI 302-1, GRI 305-1, GRI 305-2

TR-RO-110a.1.

The Group has implemented and planned various actions to upgrade the energy efficiency of offices and facilities, promote the electrification of the vehicle fleet, reduce waste generation, enhance technological capabilities, improve digital connectivity, support urban upgrading initiatives, and promote sustainable mobility. Specifically, in 2023, the Group undertook projects to reduce the energy footprint of specific OSY offices, replace depot lighting with LED systems, and make changes to accommodate electric buses (parking, maintenance, charging).

In 2023, the Group's total energy consumption amounted to 2,039,393,599.99 MJ. The majority of this energy was consumed by OSY, accounting for 65.45% (a reduction of 6.30% compared to 2022), followed by STASY at 34.48% (a reduction of 5.01% compared to 2022). OASA consumed only 0.07% of the total energy (a reduction of 6.49% compared to 2022), as its activities are limited to administrative buildings. Additionally, none of the Group's companies used energy from renewable sources.

Figure 1: Energy consumption (MJ)



Note: More information on energy consumption is available in section 6.4 "ESG performance indicators (KPIs)".

Direct Scope 1 emissions amounted to 100,434.96 t CO₂e, reflecting a decrease of 10.85% compared to 2022. Indirect Scope 2 emissions were 55,022.58 t CO₂e (location-based) and 79,078.93 t CO₂e (market-based), achieving reductions of 24.55% and 29.49%, respectively.

Figure 2: Direct GHG Scope 1 emissions (t CO₂e)

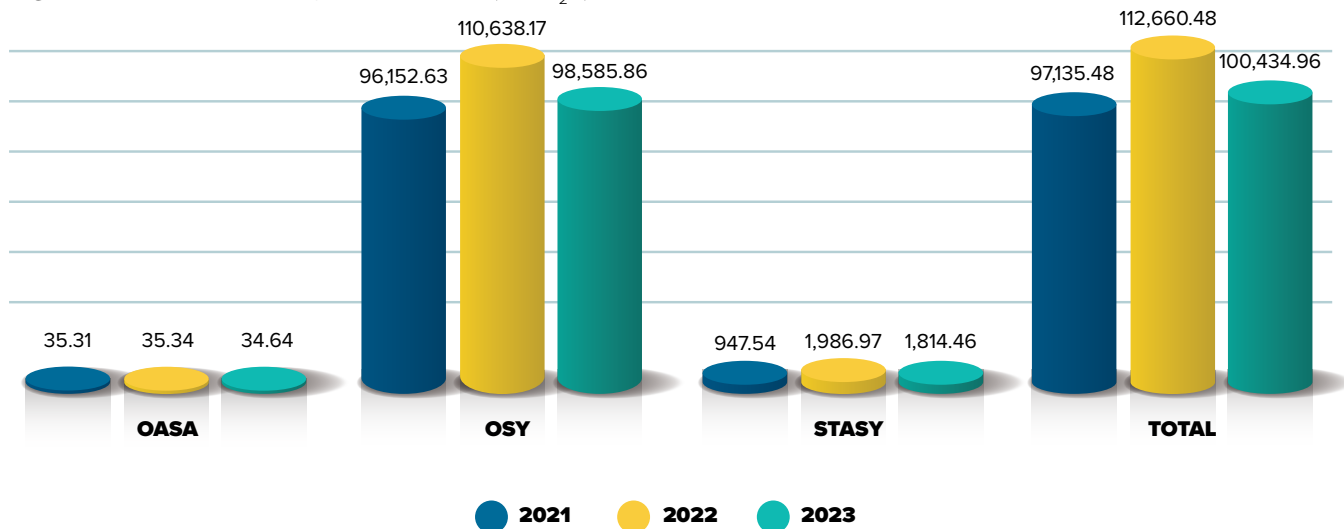


Figure 3: Indirect GHG Scope 2 location based (t CO₂e)

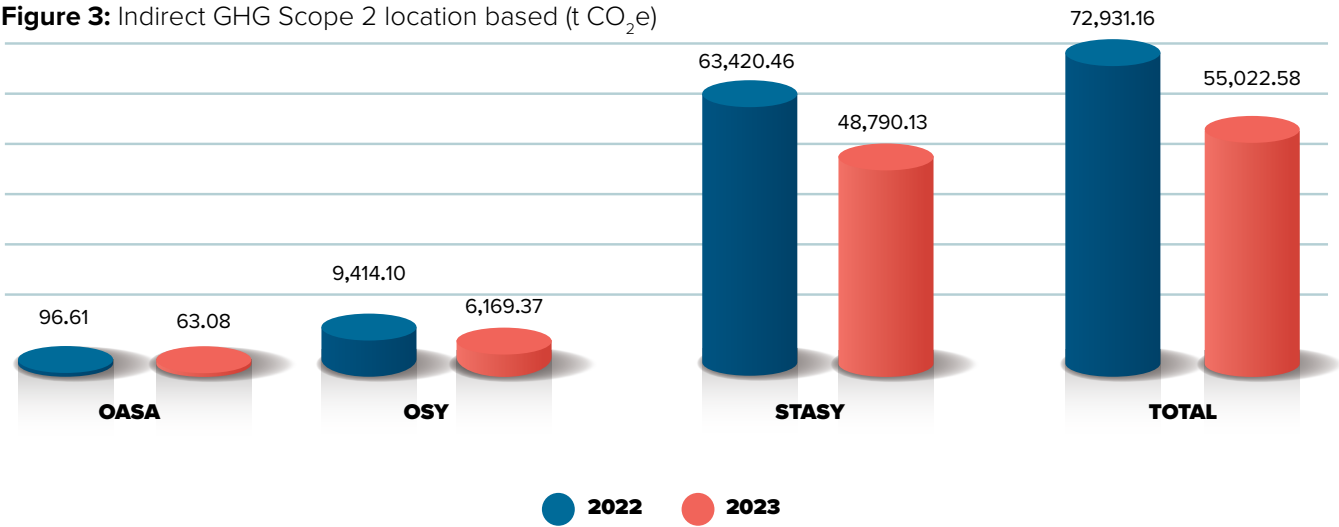
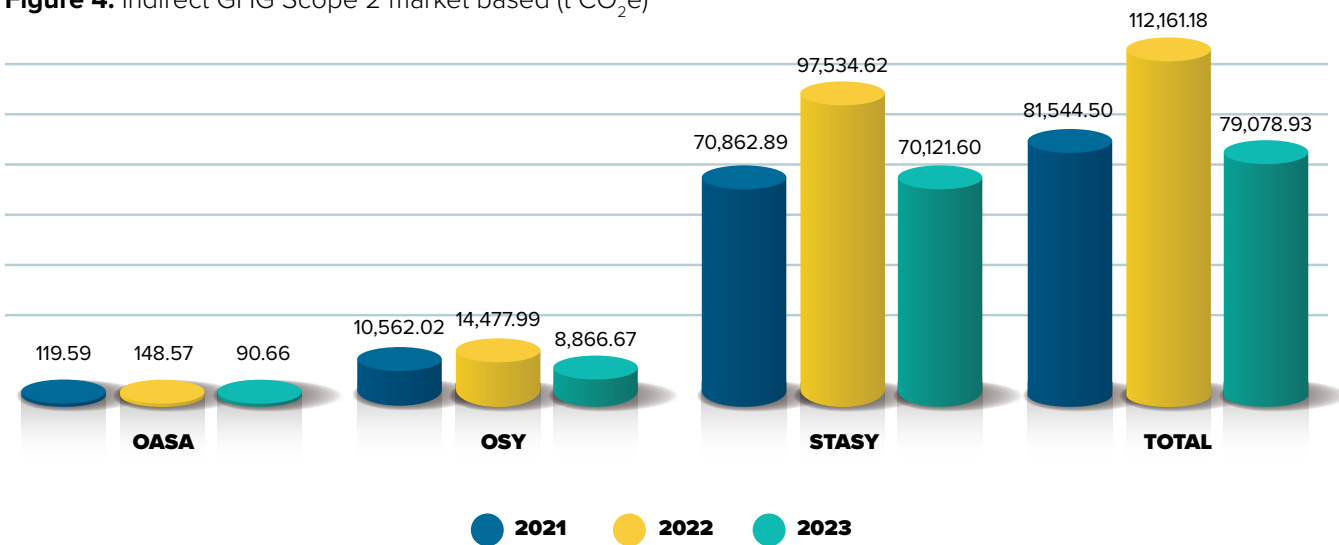


Figure 4: Indirect GHG Scope 2 market based (t CO₂e)



Note: More information on greenhouse gas emissions is available in section 6.4 "ESG performance indicators (KPIs)".

Internal Performance Indicator: Use of refrigerants" με το format του τίτλου

In 2023, the Group used 8.08 t of refrigerants, not all of which were harmful to the ozone layer. Of this total, 90.59% (7.32 t) was used primarily by the vehicle fleet. The remaining quantity, 0.76 t, was used by STASY, while OASA did not use any freon in maintenance activities during the reporting period.

More environmentally friendly public transport

The benefits of fixed-track transportation are clearly demonstrated by the environmental data and road accident statistics in the Attica basin. These results calculated using assumptions from Attiko Metro, the Association of Greek Transport Engineers, OASA, IENE (Institute of Energy of Southeast Europe), and CRES (Centre for Renewable Energy Sources), estimate that the energy consumed per passenger for car transportation is 9.76 kWh, with CO₂ emissions of 2.55 kg per passenger.

The use of the Metro and Tram significantly reduces CO₂ and other pollutants in the city's atmosphere. As electric modes of transport, trains and trams do not produce local pollution, and despite their electricity consumption, their environmental impact is considerably lower compared to cars. The Group recognizes that reducing air pollutant emissions in Attica requires fostering a culture of sustainable transportation among passengers. To encourage the use of urban transport, STASY has installed bicycle parking spaces outside Metro stations and promotes "Car Free Day," highlighting the option of transporting bicycles via fixed-track transportation means.

Additionally, the Group, through its subsidiary OSY, maintains a fleet of trolleybuses, which are environmentally friendly and quiet. Trolleybuses are more energy-efficient and emit fewer air pollutants per kilometer traveled compared to conventional-engine buses, thus contributing to the reduction of greenhouse gases. OSY also operates buses powered by Compressed Natural Gas (CNG), which have a better environmental footprint compared to diesel buses due to the non-emission of fine particulate matter (PM). Furthermore, the Ministry of Infrastructure and Transport conducted an open tender for renewing the urban bus fleet for Athens and Thessaloniki. This procurement will add 140 electric vehicles and 300 CNG buses to OSY's fleet in 2024, replacing older conventional vehicles. OSY has also integrated 292 used vehicles into its fleet through a leasing process, thereby renewing and improving the age of its vehicles. In 2023, the distribution of OSY vehicles by motor fuel was as follows:

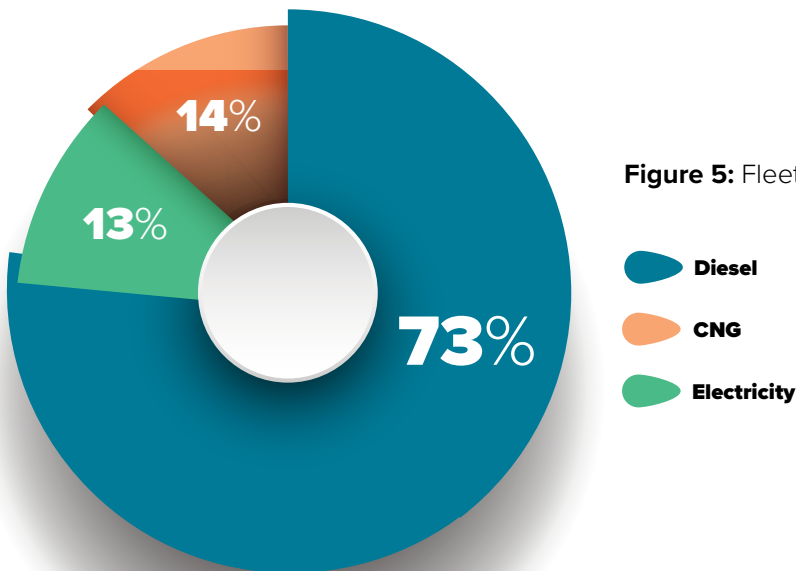


Figure 5: Fleet of OSY vehicles by motor fuel

Finally, the Group seeks to reduce the environmental burden of its vehicles by providing training to OSY drivers on energy-efficient and ecological driving ("ecodriving").

3.2 Resource and Waste Management



Material topic: Circular economy
GRI 3-3

Impacts	
Actual	Positive
	Through the efficient use of natural resources, such as reducing paper use.
	From the rational management of waste, the implementation of recycling practices and the cooperation with properly licensed bodies.
	Negative
	The lack of systematic management of natural resources, as well as the absence of binding terms to suppliers.

The activities of the Group's subsidiaries require materials essential for their transport operations, inevitably leading to waste generation. To comply with environmental regulations and ensure proper waste management, the Group's companies collaborate with appropriately licensed waste management bodies. In 2023, OASA continued digitizing its archives, particularly the Central Protocol archives, through the Papyrus Program. Additionally, OASA drafted specifications for new bus washers for OSY, designed to consume less water.

OSY initiated the ISO 14001 Environmental Management Certification process by conducting a pre-audit. STASY has implemented paper-saving practices, such as using internal websites for electronic document distribution from the Central Protocol and electronic order management. They have also eliminated local printers in favor of central printers with scanning capabilities and set up two-sided printing on all computers. In the next phase, full digitization of the Central Protocol is expected, eliminating the need for printing at any stage.

Waste Management

GRI 306-1 (a-i), GRI 306-2 (b,c), GRI 306-3.

Internal Performance Indicator: Generated waste

Waste such as lubricants and oils resulting from OSY vehicle maintenance, especially conventional vehicles, is collected by an authorized partner, using appropriate private trucks and drivers trained for this purpose and then disposed of using licensed companies. Additionally, old, useless, empty metal barrels, used tires, scrap metal materials and old accumulators (vehicle batteries) are collected and managed by licensed waste management and recycling companies.

STASY maintains long-term cooperation with approved Alternative Management Systems for managing waste electrical and electronic equipment, such as lamps, electronic boards, computers, power tools, and portable batteries. It has also contracted licensed companies through tenders for the management of Waste Lubricating Oils (ALE), lead-acid accumulators, and Ni-Cd batteries, as well as non-hazardous waste like metal chips, metal objects, and cables, and hazardous waste such as absorbents, packaging, containers, and sprays. Based on these collaborations, suitable containers have been developed for each waste type in all company depots, allowing for source separation and collection. STASY submits an annual waste report through the Electronic Waste Registry (EHR). Additionally, materials such as paper, batteries, aluminum, wooden pallets, accumulators, rails, and wooden sleepers are recycled.

In 2023, OASA produced municipal office waste that is not currently recorded. It generated 279.43 t of waste and 741 pieces of old, empty metal barrels. STASY produced 885.17 t of waste.

Integrated Rewarding Recycling Program

STASY, in collaboration with the National Collective System Rewarding Recycling, implements the Integrated Rewarding Recycling Program in Fixed Track Means. The purpose of this innovative program is:

- To inform and sensitize citizens who circulate daily by means of fixed track (Metro and Tram), about the benefits of recycling in environmental protection.
- To give the opportunity to recycle packaging to passengers and others in the Rewarding Recycling Houses that have been placed in central public transport stations.

The program offers a fee of €0.03 per package to passengers and citizens. As part of the program, the "recycling train" continued to circulate in 2023, carrying the message of recycling and environmental protection and is an important communication initiative.



4. Society

4.1 Labour Relationships and Practices



Material topics:
Working conditions and employee development
Working conditions and human rights in the value chain
GRI 3-3

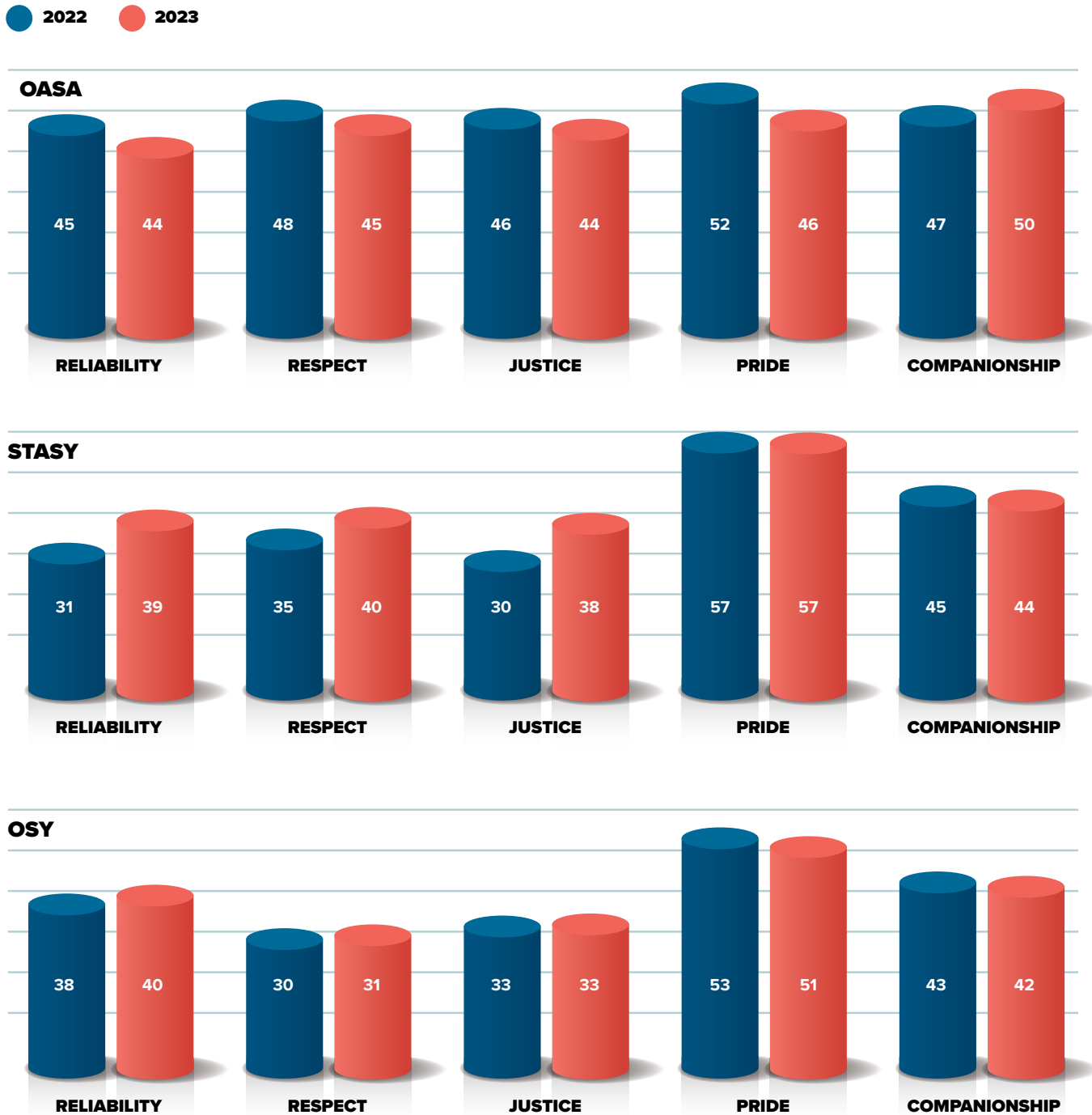
Working conditions and employee development	
Impacts	
Actual	Positive
	Through productive work in conditions of human dignity and the implementation of policies on health and safety at work.
Potential	Negative
	Actual negative effects associated with accidents at work in OASA's subsidiaries.
Financial Opportunities	
From increased profitability, due to productive work in decent conditions, attracting high-level executives and high employee retention and the development of employees' skills through the use of technology.	
Financial Risks	
From the inability to attract qualified executives due to uncompetitive salaries, from loss of revenue in cases of closure due to employee mobilizations, and from the cost of any fines and sanctions and the negative reputation in cases of non-compliance with labor legislation on working hours.	
Working conditions and human rights in the value chain	
Impacts	
Potential	Negative
	Failure to implement established policies and procedures that create working conditions that do not promote freedom, equality, security and human dignity.

Employee wellbeing and wellness are integral parts of every company's culture that promotes sustainable development and one of the most important factors for its success. The Group recognizes the importance of working conditions and seeks continuous interaction with employees so that it can timely implement corrective actions and improve the daily working life of its people.

In this context, the Group conducts on an annual basis the Great Place To Work (GPTW) employee satisfaction assessment survey with the participation of employees of the Group's companies, in order to reflect their views. Employees were asked to evaluate five critical dimensions of the work environment: "Reliability", "Respect", "Fairness", "Pride", "Companionship". The aim of the initiative is to record the proposals of employees and then to design and implement actions to improve the effectiveness of corporate practices, enhance the quality of relationships and trust within the Group and form a systematic two-way communication channel between employees and management, in order to avoid financial risks related to low employee satisfaction, such as loss of revenue in cases of strike action.

In addition, the Group, through the survey, communicates with all staff through the various communication channels, keeps the internal website (intranet) of its companies updated so that there are available data on necessary labor and operational issues. Regular meetings with staff are also held to discuss important updates.

Figure 6: Employee evaluation by occupational dimension of GPTW survey 2023



Human resources data

GRI 2-7, GRI 2-30

The Group monitors and records all its employees, on an annual basis, by gender (women, men, other), by type of contract (indefinite or fixed term), type of employment (full-time and part-time). The area of activity of all human resources is Attica.

In 2023, human resources amounted to 7,395 compared to 7,228 employees in 2022, presenting an increase of 2.31% due to increased business needs in OSY and STASY which led companies to recruit.

The majority of employees were employed in OSY, which accounted for 66.22% (4,749 employees). Women accounted for 11.59% (857 employees) of the total human resources, which is attributed to the nature of the Group's activities and almost all human resources, 96.34% (7,124 employees), was permanent.

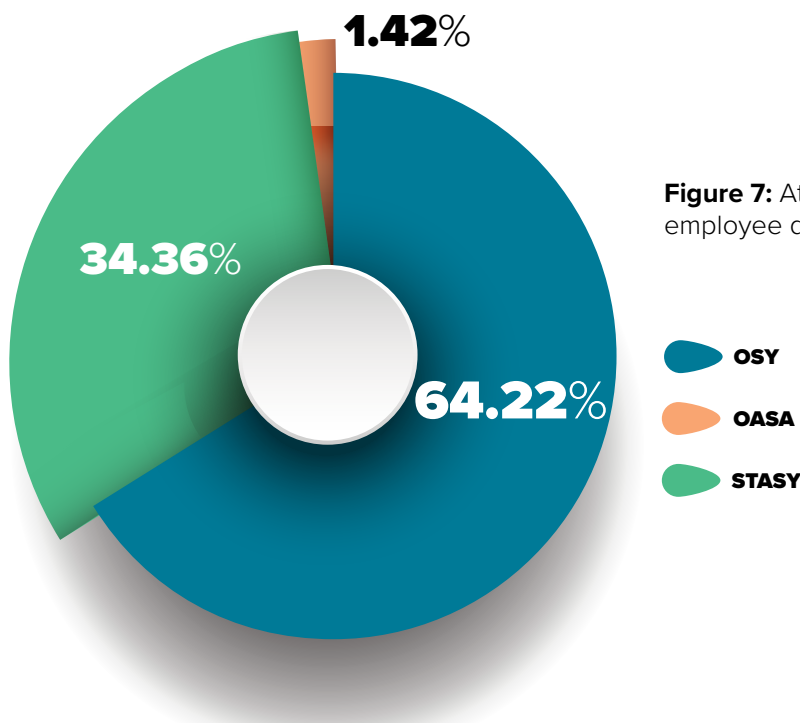


Figure 7: Athens Transport Group employee distribution

For the calculation of the number of employees, the "headcount" methodology was applied on 31.12.2023 of the respective year, while all employees with an employment contract were included in the recording. For 2023, all human resources was covered by Collective Labour Agreements (CLAs).

Facilities

GRI 2-21 (a,c) , GRI 401-2 (a-i,a-ii, a-iv), GRI 405-2

The current CLAs concluded between employees of all 3 management of the Athens Transport Group. They actively highlight and ensure over time the cooperation and commitment between employees and companies, representing an important tool for regulating issues related to working conditions, the rights and obligations of employees, as well as the rights and obligations of the employer.

The OASA CLA includes the provisions of the current legislation on work-life balance for parents and carers (parental leave, paternity leave, absence for reasons of force majeure, carer's leave, etc.) and has made arrangements for leave related to family protection (childcare leave, leave due to illness of a child or other dependent, leave to hospitalize children, leave due to serious illnesses of children, reduced hours for parents of children with disabilities, etc.).

The adoption of the above measures and their incorporation with appropriate additions of benefits (e.g. support for the further training of all employees according to their field of work, possibility of using crèche and kindergarten services, etc.) within the framework of the CLA, reflects the social sensitivity of OASA and the recognition of the importance of employees in modern working reality. The agreement creates a balanced working environment that serves both the interests of employees and the employer, enhancing the positive dynamic between the two sides.

In the same context, the CLA of OSY meets legislative requirements by providing parental leave, paternity leave, absence for reasons of force majeure and carer's leave, to ensure the necessary work-life balance of employees. Also, the company offers licenses related to family protection, such as childcare leave, leave due to illness of a child or other dependent member, childcare leave, leave due to serious illnesses of children, reduced hours for parents of children with disabilities, coverage of driving license renewal costs of Traffic Personnel (drivers), etc.

Also, OSY supports the training of its employees according to their field of work and provides the opportunity to use nursery - kindergarten and camp services. In the CLA for the period covering the year 2023, all benefits deriving from previous BIPs are reported, while at the same time benefits related to::

- Daily meals for all employees.
- The support in the monthly coverage of attendance at nursery schools.
- Women employees, who were given an extra day of paid leave for annual gynecological check-ups.
- The production of the Transportation Project.

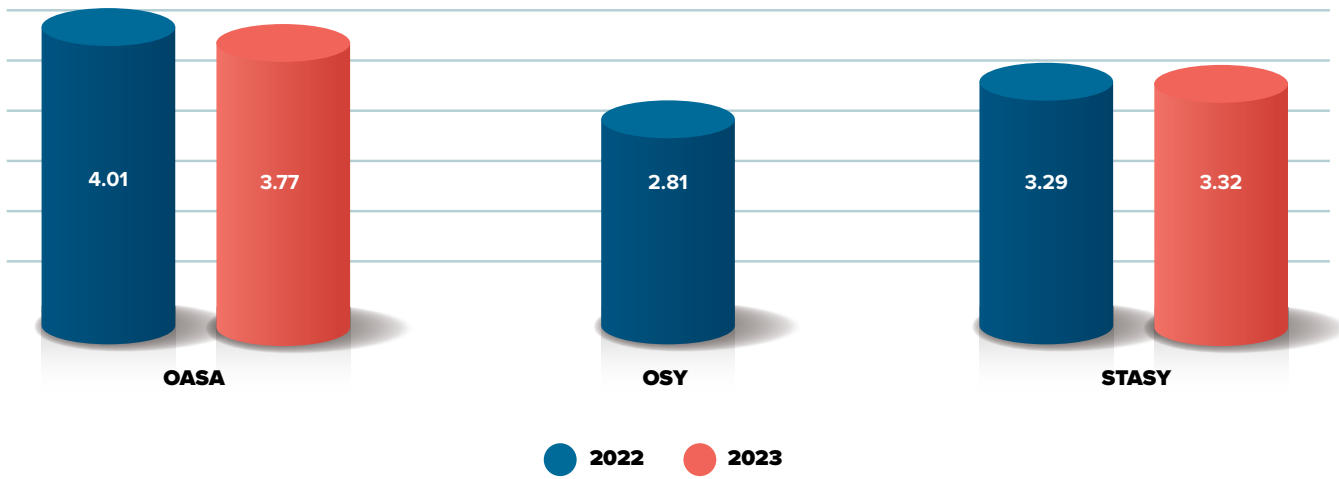
Regarding STASY the CLA 2022-2023 is the pinnacle of previous CLAs, as additional non-wage benefits were added, and years of service issues were resolved. Some of the non-wage benefits granted to its employees are the following: use of crèche and kindergarten services with a monthly payment for each child, scholarship system at all levels of education for the children of employees and the employees themselves, coverage of costs for hosting the children of employees in a camp of the former ISAP or in private ones, expenditure for cleaning work uniforms, child birth allowance, annual financial support for a disabled child, student-school allowance, purchase of military service and purchase of mothers' pensionable time. Also, the provision of daily meals to all employees. At the same time, the company contributes to the Auxiliary Personnel Insurance Fund (K.E.A.P.) as well as to the Youth Account to address needs required due to studies. In addition, the legislative provision of an insurance program covering preventive and diagnostic tests is in progress, as well as the issuance of a Joint Ministerial Decision for the administration of dangerous and unhygienic tests.

In addition, it operates a corporate Blood Bank in cooperation with the Employees' Unions and is at the disposal of employees and their families, in case of need. URBAN RAIL supports the Football Sports Team and the Runners Team consisting of colleagues from all three fixed track media. Also, at the company's premises in Neo Faliro is located the Supply Cooperative, where employees can make their purchases through special partnerships at preferential prices. Finally, STASY makes suggestions for motivating employees such as unhealthy benefits, working in a position of responsibility and recording processes and development.

Regarding the remuneration ratio of the CEO / Employees⁵ it stood at 3.77:1 for OASA and 3.29:1 for STASY.

⁵ The CEO/Employee remuneration ratio is defined as the ratio between the annual total remuneration of the CEO and the average value of the total remuneration of employees (excluding the remuneration of the CEO).

Figure 8: Remuneration ratio of the CEO / Employees of Athens Transport Group



Note: More information regarding the CEO/Employee remuneration ratio is available in section 6.4 "ESG Performance Indicators (KPIs)".

Figure 9: OASA Ratio of basic salary and remuneration of women to men

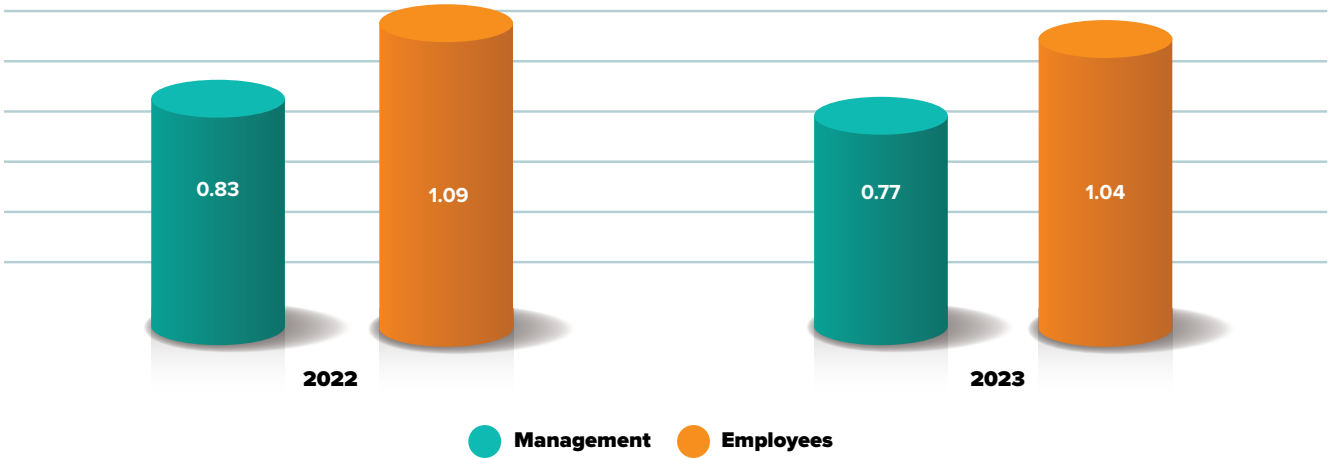


Figure 10: OSY Ratio of basic salary and remuneration of women to men

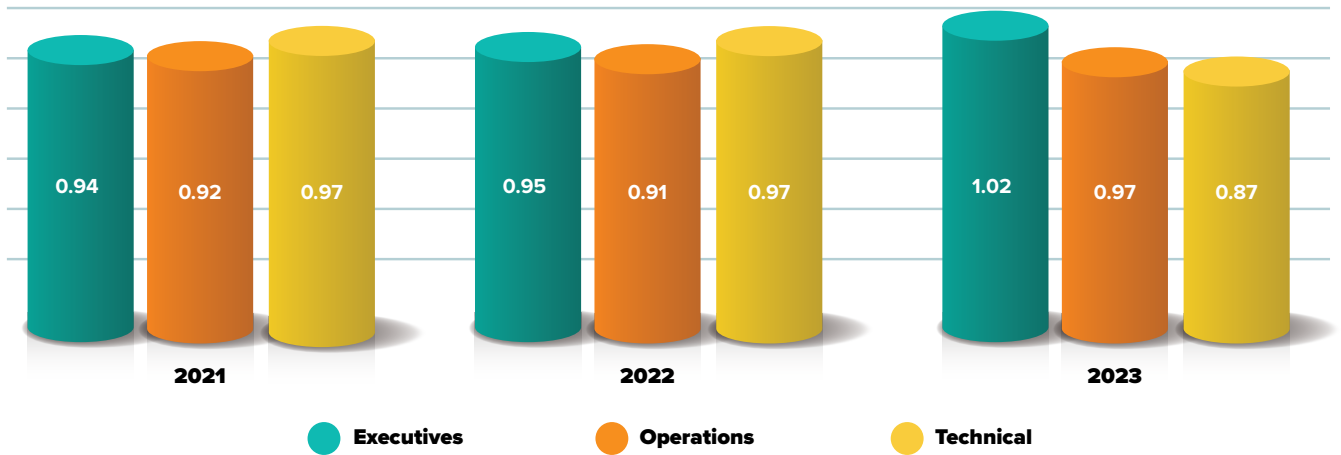
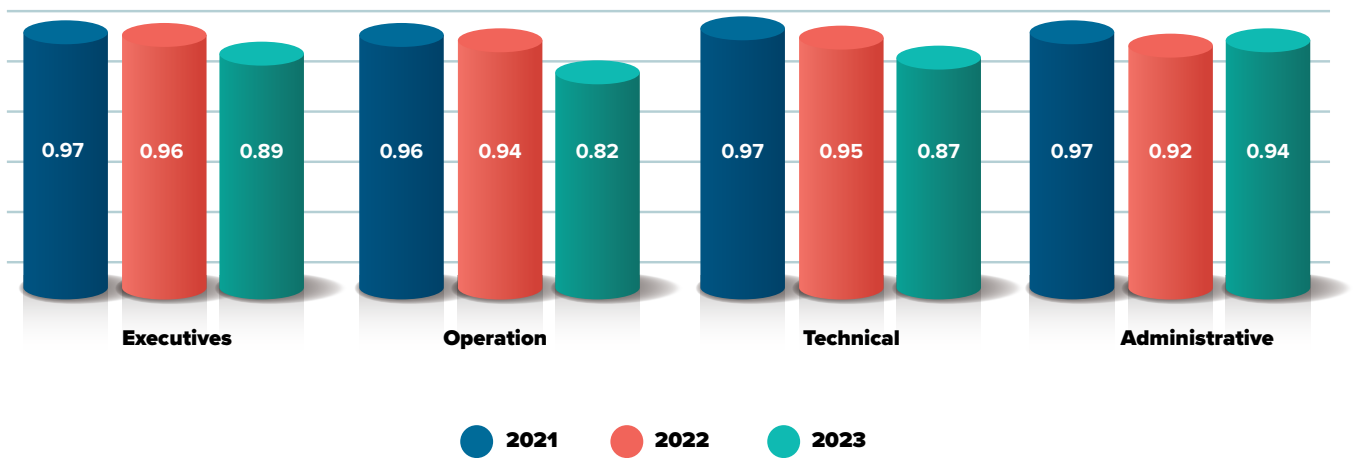


Figure 11: STASY Ratio of basic salary and remuneration of women to men



Note: The Basic Salary Ratio of Women / Men by Hierarchy Level in OASA for 2021 is not available. More information on women/men's basic salary data is available in section 6.4 "ESG performance indicators (KPIs)".

In addition, 684 Group employees took parental leave, of which 483 men and 201 women, showing an increase of 8.40% (631 parental leave). The largest percentage of the permits concerned STASY employees.

Employee Wellness - Wellbeing

STASY, recognizing the need to support all its employees and wanting to promote a culture of empathy, understanding and work balance, adopts practices to strengthen the well-being of its employees. The well-being of its employees is a provision of utmost importance. URBAN RAIL creates the most favorable conditions for its employees and offers benefits, beyond its regulatory obligations towards them, by investing in:

- Mental-Emotional Wellbeing with emphasis on the implementation of a counseling support program,
- Social Wellbeing by creating actions to increase employee intimacy,
- Physical Wellbeing such as special leave, insurance and
- Financial Wellbeing by providing various types of benefits and Family Friendly Policies.

Indicatively, some of the wellness benefits are the following:

Actions for Mental-Emotional Wellbeing:

- 24-hour Telephone Line for Counseling Support of Employees & members of their family.
- Memorandum of Cooperation with the "THALPOS-Mental Health" Center in Athens, where employees can receive FREE personalized mental health services through individual sessions with one or more health professionals or participate in group information and psychosocial support programs, either at the Company's offices or at any other location (2024).
- Podcasts on various wellbeing topics.
- Psychological education webinars - Cyber talks.
- Tips-Tips on various topics.

Family Friendly Politics:

- Family Friendly Politics e.g. flexible working hours where possible, paid leave, parental support through special leave, child birth allowance, school - student allowance, marriage leave, childcare allowance, rewards for children of employees for distinctions by official sports bodies, etc.
- Support of parenthood by providing special leaves such as: marriage, paternity, pregnancy - postpartum, school performance, child illness, special leave for employees with children or spouses of people with disabilities.

Actions for Social Wellbeing aimed at strengthening the Corporate Image:

- Establishment of an annual New Year's pie cutting event at the metro station "Syntagma" for all employees, with awards for employees athletes & children of employees due to their discrimination in sports events & draw of great prizes.
- Music performance for "International Women's Day" with Yiannis Parios at Pallas Theatre (10.03.2024) for all the women of the Company.
- Provision of personalized gifts e.g. lucky charms to all employees, for the new year, gifts during the holidays to the children of employees in order to get to know better the network of STASY.

Actions for Physical Wellbeing:

- Creation of STASY Sports Teams
- STASY Workers' Football Team,
- STASY Runners Team,
- STASY Tennis Team
- STASY Basketball Team

Actions for Financial Wellbeing

- Legislative provision for the Insurance program covering preventive and diagnostic tests (in progress).
- Childcare allowance.
- Scholarship system at all levels of education for employees' children and employees themselves.
- Coverage of costs for the accommodation of children of employees in a camp of ISAP or in private.
- Rewarding employees, athletes & their children who excelled from official sports bodies by paying an amount in the form of vouchers.
- Meal vouchers.

Social Wellness

- Actions to develop the familiarity of employees.
- Volunteering actions.

Physical Wellness

- Group Insurance Program.
- Licenses, e.g. gynecological testing, blood donation, etc.
- Creation of sports teams (football, runners, tennis, etc.).

Training and skills development

GRI 404-1 (a-i), GRI 404-2 (a)

The Group continuously invests in the training and development of its employees across all three companies, recognizing that the high level of services offered and passenger satisfaction depend on the skills of its workforce. Employee training not only contributes to personal development and empowerment but also enhances professional skills and performance. Moreover, continuous education and training help establish good corporate practices, strengthen cooperation, and improve corporate identity. The Group offers both internal and external training opportunities, enabling employees to acquire new knowledge and expertise that support their personal development and professional growth. As employees' professional and scientific backgrounds improve, so does the Group. In 2023, 64 employees of the Athens Transport Group enrolled in Growthfund's Sustainability Academy, with 25 receiving certificates for their successful participation.

Specifically, OASA conducted training programs to enhance employees' skills in corporate processes such as submitting detailed periodic EFKA declarations, electronic document handling, and controlling and clearing public procurement expenditures. Additionally, training was provided in quality passenger service and MS Office applications.

In the context of telematics work, annual training and updates to the training manuals for OASA and OSY users were conducted, reflecting new functionalities and tools developed during the year. An intensive specialized training program was also implemented for the operators of the OSY Vehicle Management Center, focusing on the full functional integration of routing data into the Real-Time Passenger Information systems (Daily Scheduling).

OSY has implemented a variety of training programs covering topics such as company organization and operations, procurement, financial matters, legislation, personal data processing and security, new communication technologies, computer skills enhancement, executive development, and ecological driving ("Eco Driving"). In collaboration with the P.E.I. School of OSY, these programs also include training for the Certificate of Professional Competence.

Additionally, OSY has launched the innovative online knowledge portal "OSY Academy," the first online academy designed to meet the needs of a DEKO. This portal aims to equip employees with the necessary knowledge and tools to ensure their safety and that of the traveling public. OSY employees can access training and information anytime, anywhere, using various methods. The portal features training technologies, interactive activities, electronic equipment simulations, eBooks on company procedures, and video animations. It serves as a valuable resource for both learners and trainers, combining asynchronous digital training with traditional classroom activities.

The online material includes comprehensive training programs tailored to employees' needs. Users can find courses on company culture, bus simulations and mechanisms, the Certificate of Professional Competence (P.E.I.), and essential technical and theoretical knowledge. Moreover, a special section has been created for employees' children, where they can explore with their parents' bus, play with their favorite characters, and learn songs in Greek and English.

STASY conducts trainings on two main pillars:

- **Training / Retraining in the technical subject of each job position and safe work training.**

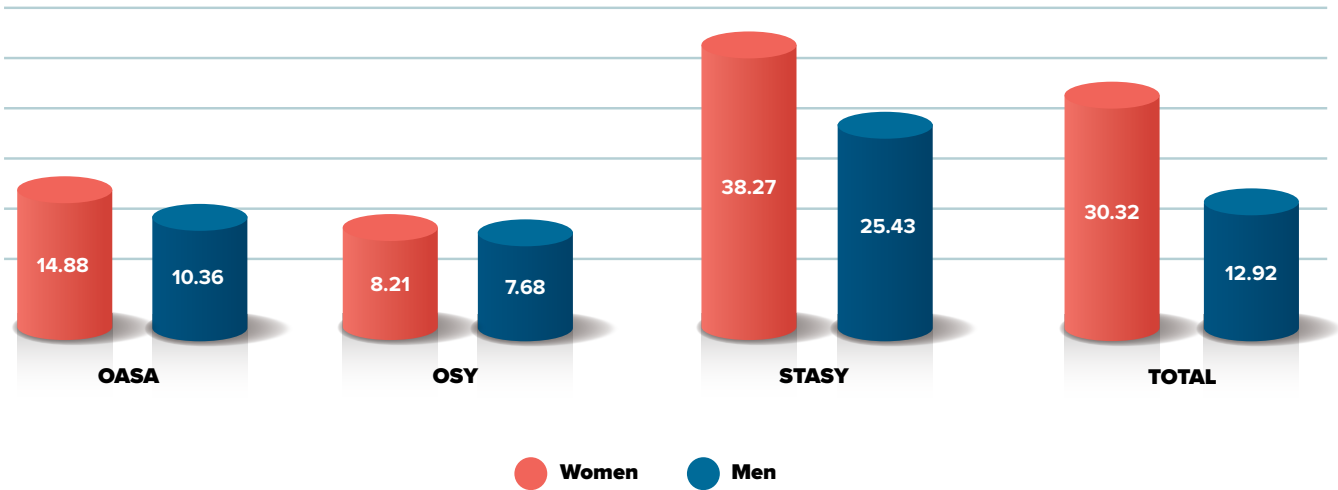
Through this training, employees are trained in preventing and dealing with the risks lurking in their STASY network, with the aim of better serving the traveling public, both in terms of traffic management and safety and reducing occupational accidents. In cooperation with Safety Technicians, training on health & safety at work and proper use of Personal Protective Equipment are planned and implemented, in accordance with the provisions of legislation and Occupational Risk Assessments.

- **Training of staff on administrative, financial and support issues.**

This training mainly concerns new legislation on administrative and financial matters, procurement and supply, introduction of new technologies, etc. Employees also participate in the training programs organized by the National Center for Public Administration and Local Government (EKDDA). Administrative training also includes staff training in first aid and cardiopulmonary resuscitation.

In addition, STASY designs and implements trainings on the "horizontal" skills of staff and finances, after evaluation, undergraduate and postgraduate programs of formal education, which are attended by employees. In 2023, the average training for the Group was recorded at 30.32 for women and 12.92 for men.

Figure 12: Average hours of education by gender in 2023



Note: The company has modified the methodology of calculating the average training of employees by gender. Therefore, the performance of 2023 is not comparable to that of 2022. More information regarding training data is available in section 6.4 "ESG Performance Indicators (KPIs) and for the OSY ACADEMY Knowledge Portal on <http://www.osyacademy.com/> website.

Employees turnover

GRI 401-1

The cultivation, establishment, and consolidation of a stable, modern, and healthy corporate environment that promotes the Group's work and is characterized by the principles of equality, respect for individual rights, and diversity is everyone's obligation. This is a requirement of the Group's Code of Ethics and Professional Conduct.

Within the Group, everyone is expected to operate meritocratically, treating colleagues and partners with respect and dignity, and not tolerating any form of discrimination or harassment in the workplace. This approach ensures the creation of a working environment with equal opportunities for development and professional growth for all, which is essential for healthy business activity, social cohesion, and progress.

To regulate working conditions and maintain labor peace, the Group's subsidiaries adhere to the Internal Organization and Operation Regulation⁶ (KEOL). KEOL governs the Disciplinary Law applicable to employees and imposes disciplinary penalties through the appropriate bodies, such as the Disciplinary Council of the Company, the CEO, General Managers, and Directors. KEOL fosters adherence to rules and frameworks, clarifies unpleasant incidents at work, and reinforces the practices and values that govern the Group's companies.

The Group systematically monitors and records employee hires and departures, as well as related indicators. In 2023, there were a total of 464 new hires and 286 employee turnover.

⁶ FEK 505/28.02.2014

Figure 13: Hires

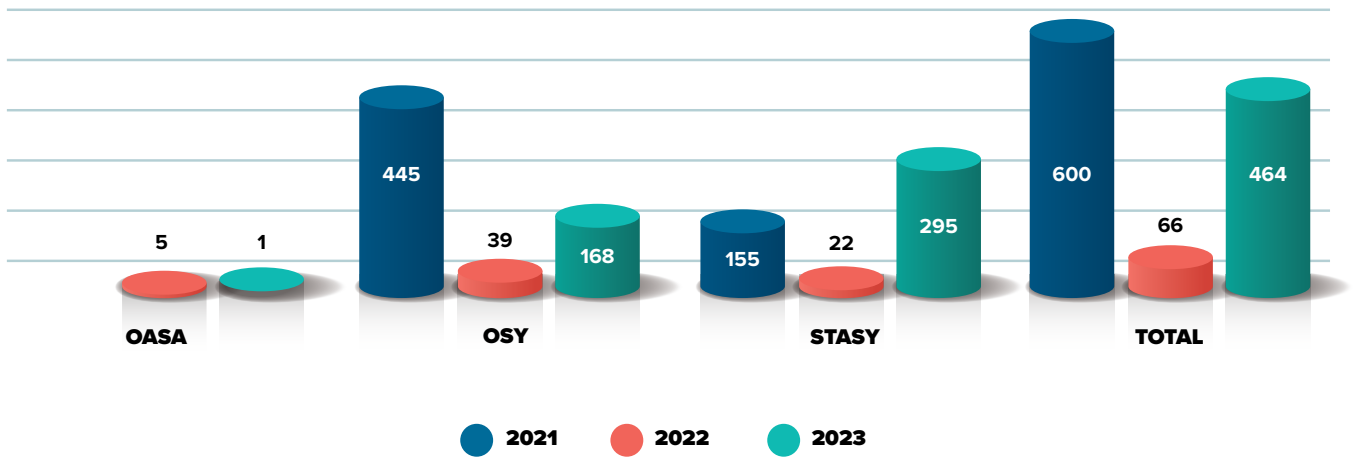
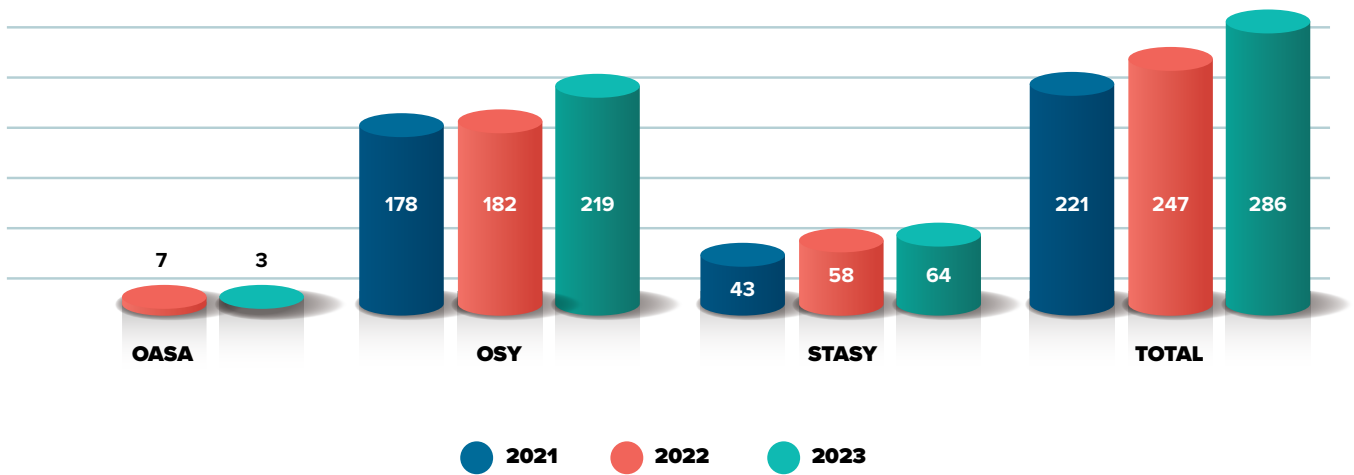


Figure 14: Turnover



Note: For OASA there are no data available on recruitment and departures for the year 2021. More information on employee mobility data is available in section 6.4 "ESG performance indicators (KPIs)".

Health and Safety

The Group is committed to ensuring, to the extent possible, the safety and well-being of all employees and to protect passengers from risks that may arise from its activities. In this context, it implements a Health and Safety Management System, carries out a risk assessment and provides health services to employees. It also conducts trainings and preventive exercises to deal with emergencies and encourages employees to communicate situations when they perceive that risks arise, so that they can immediately take corrective actions.

Health and Safety Management System

GRI 403-1

The Group implements a Health and Safety Management System, which is in accordance with legal and other national, EU and international requirements, directives and regulations in the field of health and safety and has been based on data collected for risk assessment purposes.

Whenever a potential risk is identified (exposure to chemicals, intense noise or vibration, excessive work stress, prolonged adverse postures requiring ergonomic interventions, etc.), a risk assessment of the relevant risk is carried out, resulting in the recommendation to the management of the Group's companies to take administrative, organizational and technical measures to prevent any adverse effects on employees' health.

The System covers all employees, including employees who are not employees of the Group (employees of contractors and external partners). For their medical oversight, which is provided by their own employers, the Group applies relevant legal provisions. Furthermore, the Health and Safety Management System covers tasks carried out by the employees of the subsidiaries (electrical, electromechanical, construction, maintenance, track works, rolling stock, telecommunications, signalling).

Regarding facilities, the System covers all workplaces including boarding stations, warehouses and Metro tunnels. As far as the premises of OASA are concerned, there is no System as they are office buildings and the nature of the staff is office employees.

Addressing Health & Safety Risks and Employee Participation

GRI 403-2, GRI 403-4

TR-RO-320a.3

The identification of risks to workers' health and safety is of particular importance for the effectiveness of the measures implemented. The Group's activity involves risks that are largely unavoidable, such as traffic within the city, exposure to physical agents such as noise and vibration, work with chemicals, and even criminal acts in public places.

In this context, the Group takes measures that include hazard elimination at source, replacement of material or process, safe working methods (ergonomic improvements and organizational procedures, such as shift duration and night shift management) and personal protective equipment.

For the premises of the buildings and the employees of the Group's offices, the process of identifying potential risks is carried out by the Safety Officer of each company, who visits and consults their facilities throughout the year and informs the Technical Departments in writing and orally of any comments. The Group's companies ensure the integrity of the risk identification process through its cooperation with a specialized firm, which undertakes the writing of each Written Occupational Risk Assessment (GEEK), in cooperation with the Technical Departments.

However, in addition to risk identification procedures, workers and their representatives, either as members of the Trade Unions' Health and Safety Committee and individually, have an important role in communicating them.

Employees are required to report to their Supervisor any failure or defect in the equipment or facilities they use, so that any possible risk can be contained. Workers are also asked to report whether they have identified activities and procedures or actions of third parties which may cause hazards and possibly lead to accidents, destruction of equipment or installation, or damage to foreign property and take action to minimize risks within their work environment. Then, after examining

the situation, the Occupational Medical Service issues adequacy or non-adequacy documents or recommends collective preventive measures.

The monitoring of the implementation and implementation of the measures for Health and Safety at work is carried out in cooperation with the Safety Technician and the Occupational Doctor, with the management of the Group's companies, as well as with the employees. Cooperation is achieved through meetings, written or oral briefings or reports and/or visits to premises and facilities.

In the GEEK, as well as in the instructions that have been notified, it is stipulated that in case an incident occurs, the Occupational Doctor and the Safety Technician are first informed, in addition to the competent authorities, who will investigate the incident and its causes and propose measures on how to prevent similar situations in the future. In addition, the respective divisions of the subsidiaries continue to study health and safety incidents (accidents, near misses, sudden illnesses in the workplace, long-term absences) individually and collectively, then issuing conclusions and recommendations for preventive measures.

Implementation of Security Measures in Building Facilities

Based on the occupational risk assessment, the Technical Departments of the Group's companies carry out repair and maintenance work for the buildings, electrical and plumbing equipment, as well as networks, to safeguard the health and safety of employees, informing the management of further obligations, in order to initiate other, new actions deemed necessary.

In particular, regarding the headquarters of OASA at 15 Metsovo Street in Athens, due to the age of the building, marble fell from the balconies and due to this, all necessary actions were taken in order to install scaffolding and a safety net.

The company has taken all necessary steps to repair the facades of the roof to carry out the repair works. However, the company's management has decided to relocate its services to a new building. Regarding the building at 16 Rethymnou Street in Athens, by decision of the Board of Directors, a Fire Safety team has been appointed and a preventive evacuation exercise of the 6th floor has been carried out, according to the instructions of the Safety Officer, because it is a six-story building that houses the largest number of employees and a Public Service Room. Also, a security system with alarm, cameras and entrance control, as well as a fire detection system will be installed in the building at 16 Rethymnou Street, as provided by the Fire Safety Study. It is noted that in all facilities the Technical Department has prepared and posted the Escape Diagrams per floor.

OSY has developed a security system which includes recording and surveillance cameras of the Ano Liosia and Thrasio A/S, while at the same time the guardhouses of the security personnel have been reinforced with 24-hour staffing. A turnstile system has been installed at the Central Service. In addition, additional lighting pylons and an entry-exit control system for vehicles (parking bars) have been installed in all depots. At the premises of OSY, escape plans have been posted and fireproof security doors have been installed at the Central Service as well as an approved fire safety study has been implemented in the headquarters building and all safety measures are applied in accordance with current legislation.

STASY, in compliance with Law 2434/12-09-2014, implements and maintains the appropriate structure of Chief/Deputy Chiefs/Fire Protection Teams, for all its facilities, in local depots and in the railway network, above ground or underground. Relevant fire safety issues are recorded in an organized manner and are immediately resolved by the competent technical services of STASY, as they carry out a preventive maintenance program in all means of fire protection, active or passive. Also, the issuance of Fire Protection Certificates is complied with in accordance with the applicable legislation and the relevant instructions of the Fire Service and a Fire Safety File is created for each Fire Station of the railway network, in order to deal with fire incidents more effectively.

STASY is in direct and frequent contact with the Fire Brigade, through links designated on behalf of STASY and the Fire Brigade where joint evacuation exercises of trains and stations are planned and implemented. There are also regular evacuations of building structures by all staff.

Health Services Provided

GRI 403-3, GRI 403-6

According to individual and collective labour agreements, the National Social Security System compulsorily covers all workers in terms of health insurance, sick leave, as well as public hospital/diagnostic tests. The Group implements a system of medical monitoring, protection and prevention of employees' health through:

- Periodic medical examination of all staff, based on individual health status, age and type of work.
- Additional medical examination upon request.
- Examination after illness/long sick leave.
- Examination after a change of job.
- Check after an accident.
- Examination after incident report.
- Examinations for new recruits.

Also, employees may come at any time to be examined for health issues that may affect their work capacity or for health disorders that may be caused by their work.

In addition, in compliance with legal requirements, employees have access to their own medical record, which is securely kept and classified by the Medical Service. Employees undergo periodic medical examinations by Occupational Physicians, using the Group's medical instruments and, when necessary, are referred to external physicians. The participation of employees in the above activities is facilitated by administrative procedures, such as shift modification, referral for consultation during working hours and exchange of administrative documents (including medical documents), which is implemented under strict confidentiality rules.

Other health benefits of the Group include the organization, equipment, installation and maintenance of first aid facilities and procedures, the conduct of vaccination programs and the establishment of groups of high-risk employees for heat waves, for extreme incidents of air pollution. The Group voluntarily offers advice and guidelines on health issues, focusing, mainly, but not exclusively, on the prevention of health risks from smoking, obesity, drug and alcohol abuse, immune system disruption, reduced sleep, stress and psychosocial factors.

Health and Safety Education

GRI 403-5, GRI 403-7

Training on Health and Safety at work is part of the training programs organized, both during the recruitment of employees and in cases of job change. Specifically, first aid training is provided to selected staff members and training seminars on occupational hygiene and prevention (including anti-bullying counseling services). Furthermore, employees receive updates and training material on Health and Safety and dealing with potential risks via email and can address any questions, clarifications and remarks to their supervisor, the respective Human Resources Directorates (HRM), the Safety Technician and the Occupational Doctors.

In addition, OSY, on the initiative of the Technical Department, conducts fire safety training of personnel by the Fire Service, on a date when the competent Service will be available. First aid training has been implemented for traffic personnel (drivers, station managers and supervisors). Furthermore, it has been proposed to HRM and the Occupational Doctor to conduct first aid training. Subsequently, STASY implements training on Fire Protection issues for all personnel and a more specialized training cycle at the Fire Brigade Academy. In addition, it maintains a Memorandum of Cooperation in First Aid with the Red Cross aiming at training employees and citizens in dealing with health emergencies in its facilities and a Memorandum of Cooperation with the Hellenic Institute of Occupational Health and Safety (ELINYAE) aiming at training and information on specialized health and safety issues of employees.

In addition, the contracts signed with contractors include a special annex concerning the terms of Health and Safety at work, which must be observed during the execution of work by employees of the contractors at the facilities of the Group and its subsidiaries. In addition, before the commencement of works, the subsidiary companies provide training to the employees of the contractors and give the necessary certifications, depending on the works and the place where they are performed..

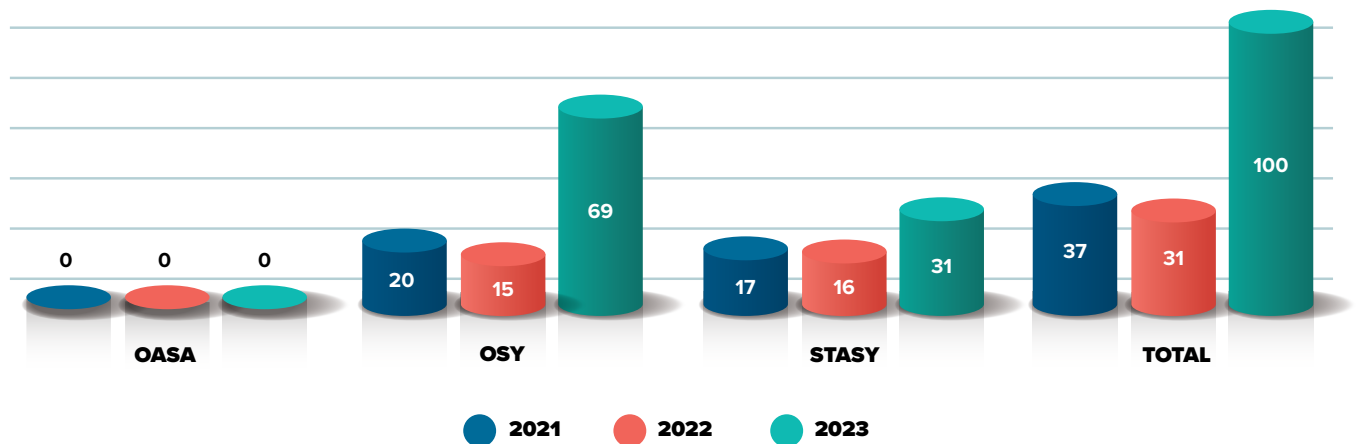
Health and Safety Facts

GRI 403-9 (a,e, f), GRI 403-10 (a-ii)

TR-RO-540a.1

During the reference year, there were 31 injuries to STASY employees and 69 injuries to OSY employees compared to 16 and 15 respectively for the previous year, while at OASA there were no recorded injuries. The incidents that occurred concerned injuries from slip-tripping, traffic accidents while moving from work to the employees' home, external threat-criminal action, collision with fixed objects, pathological causes and falls. There has also been no workplace-related illness in employees of the Group's companies.

Figure 15: Recorded injuries



Note: More information on health and safety information is available in section 6.4 "ESG performance indicators (KPIs)".

Working conditions and human rights in the value chain

GRI 414-1

In the Group, all employees must understand and comply with its principles and values, acting responsibly towards society as a whole and demonstrating professional and business ethics, which does not damage its image, reputation and work. The Group considers the working conditions and rights of employees in its value chain in accordance with Law 4412/2016, which defines the Basic Obligations of the Parties, providing for evaluation of suppliers, in the context of the Processes & Procedures of the Quality Management System. In addition, the procurement regulation, the project contracts, the special procurement procedures and the framework contracts as a subsidiary of Growthfund are under development, following the adoption of Law 4972/2022.

Within the reporting year, Athens Transport Group companies did not evaluate suppliers based on social criteria regarding working conditions and human rights in the value chain. The Group does not have a separate due diligence policy, where its development is under way at OASA and STASY. For the reference year, the Group's companies are aligned with the requirements of the law and the suppliers are audited in each separate tender process based on the regulatory requirements and the corresponding invitation/proclamation.

4.2 Sustainable Urban Mobility



**Material topics: Safety of passengers and users
Customer and user rights and privacy
Sustainable Urban Mobility**

GRI 3-3

Safety of passengers and users	
Impacts	
Υφιστάμενες	Positive
	Through the provision of quality services by OASA's subsidiaries, with the help of internal training on regulations and procedures, as well as on equipment handling and passenger service.
	Negative
	From accidents on platforms or road accidents involving buses that do not allow passengers to ensure physical, mental and social well-being, including safety aspects.
Financial Opportunities	
By protecting the health and safety of consumers and end users of the products and services of OASA's subsidiaries, leading to increased profitability and reputation preservation.	
Financial Risks	
From complaints, compensation and fines in cases where the integrity and health of consumers and end users of products and services of OASA subsidiaries are endangered.	

Customer and user rights and privacy	
Impacts	
Actual	Positive
	Through seamless access to information for customers and end users.

Sustainable Urban Mobility	
Impacts	
Actual	Negative
	Through the accessibility of citizens/passengers to safe, affordable, efficient and sustainable mobility and transport systems and infrastructure.

Safety of passengers and users

GRI 416-2 (a-i)

The Group, in compliance with the Regulation on Passenger Rights for regular and occasional services by road means of public transport (Buses-Trolleybuses) and means of fixed track (Metro and Tramway),⁷ takes actions aimed at providing quality, efficient and continuously improving transport services to passengers and enhancing the effectiveness and sustainability of passenger transport in its area of competence.

⁷ FEK 1181/B/19-6-201, available at <https://www.oasa.gr>.

More specifically, E.P.S.E. serve passengers and carry out the transportation work with vehicles / trains, as the law, the contracts between OASA & E.P.S.E. and the relevant decisions of competent bodies determine. It shall take all necessary measures in a timely manner, in case of failures, to restore, as soon as possible, the smooth operation of the network and facilitate the smooth operation of the routes.

The reopening of the economy, after the restrictive measures applied due to the COVID-19 pandemic and the gradual and continuously increasing trend of using public transport, in combination with the changing epidemiological conditions of the pandemic, such as its mutations, the increase in cases, the degree/frequency of transmission of the disease and the uncertainty that had been created, made it necessary to continue cooperating with KTEL to decongest public transport and provide better service of the public.

Furthermore, the Group's subsidiaries systematically maintain rolling stock and provide all the necessary support services and facilities to ensure the safe and comfortable movement of passengers. In addition, they safeguard the cleanliness and hygiene of vehicles and trains put into circulation, as well as the areas used by the public (stations) and ensure the safe movement of passengers, prohibiting, inter alia, the entry onto the premises, means and infrastructure of the Group to people with uncovered wounds or wounds, to avoid transmission of diseases to third parties, as well as the transport of flammable and explosive materials.

During the reporting period, there were no recorded incidents of non-compliance with regulations and/or voluntary codes regarding the impact on the health and safety of OASA services. OSY continuously trains drivers to avoid incidents that may have a negative impact on the health and safety of passengers. Finally, STASY develops internal data collection procedures in order to respond to the next Sustainable Development Report.

Customer and user rights and privacy

The Group provides information to the traveling public, through telephone and electronic service, regarding its information on the Group's issues and the provision of updated information, which is always given in cooperation with its competent services. In addition, the Group meets all necessary conditions for the protection of users' personal data.

Telematics

The telematics project concerns a fleet management and passenger information system for ground transport means (buses and trolleybuses), aiming at optimizing the performance and quality of the provided transport work.

In the telematics system, where all bus lines have been integrated, it is possible to display them at "smart" stops, while the service of informing urban transport users through smart devices (mobile phones, tablets, computers) has been implemented, giving the opportunity for easy and timely updating of the details of each route.

In addition, the operational data describing the traffic events of all vehicles will be digitally interconnected with the corresponding validation data of the Electronic Ticket system as the interconnection of telematics data with the Automatic Fare Collection System (AFCS) has not been implemented, to obtain useful indications of the degree of occupancy of vehicles during peak hours. The application is used to make decisions to strengthen specific lines based on demand data with the aim of avoiding severe overcrowding. Both passengers and OASA benefit from the operation of telematics with OSY, as reflected in the table below.

Table 11: Benefits of implementing telematics

Passengers	OSY and STASY
<ul style="list-style-type: none"> • Real-time information system. • Passenger Information with 1,000 "Smart" Stops. • Informing Passengers in the vehicle about the progress of the Itinerary via Screen and Audio Announcement. • Informing Public Transport Users via smartphone, app and website (web) about the planned and executed transport project. • Availability of Transportation Services at all Urban Transport stops. • Information on Emergency Events in the Transport Network. • Reduction of waiting time at stops and total travel time. • Improvement of travel quality by utilizing vehicle traffic data. 	<ul style="list-style-type: none"> • Qualitative and quantitative upgrade of the services provided to passengers (reliability, accuracy, information). • Optimal fleet management using Automatic Vehicle Positioning System (Vehicle GPS) for real-time information. • Dynamic and Accounting Supervision of the execution of the transport project. • Two-way wireless communication between the management centre and drivers. • Update drivers by sending management center information and commands in real time. • Increase staff safety with multiple alternative communication systems (voice, text, silent emergency alarm).

Passenger Information via 11185

The Group provides information to passengers through the telephone line 11185, the line for people with disabilities (+30 2108200887) as well as through electronic means of communication (e-mail, live chat) on any matter concerning their transportation by public transport and their service in the best possible way with Athens Transport. In total, for 2023, approximately 165,000 passenger calls to 11185, 3,000 calls to the disabled line and 900 conversations (with approximately 3,000 messages) were served through the live agent function of the chat bot. In addition, through the chatbot "digital assistant" (AI), more than 72,000 passengers were served.

Also, in 2023, the common database of the information center was updated with all new information for valid and correct information, as well as tools to facilitate the search for bus service modifications and important updates. In addition, the information center provided passengers with information and service on electronic ticketing issues and specifically on the following:

- Provision of information on card issuing points.
- The required supporting documents per category of beneficiaries.
- Support in the process of activating the right to unemployed and people with disabilities.
- Information on how to acquire and use (charge, validate) new products.
- Resolving technical issues with e-ticketing. Πληροφόρηση Επιβατών μέσω Ηλεκτρονικού

Passenger Information via Email and Website

In 2023, 1,896 informative e-mails were answered by OASA, including complaints transmitted to operators through the email account, customer care. 225 announcements and press releases were issued and posted on the OASA website.

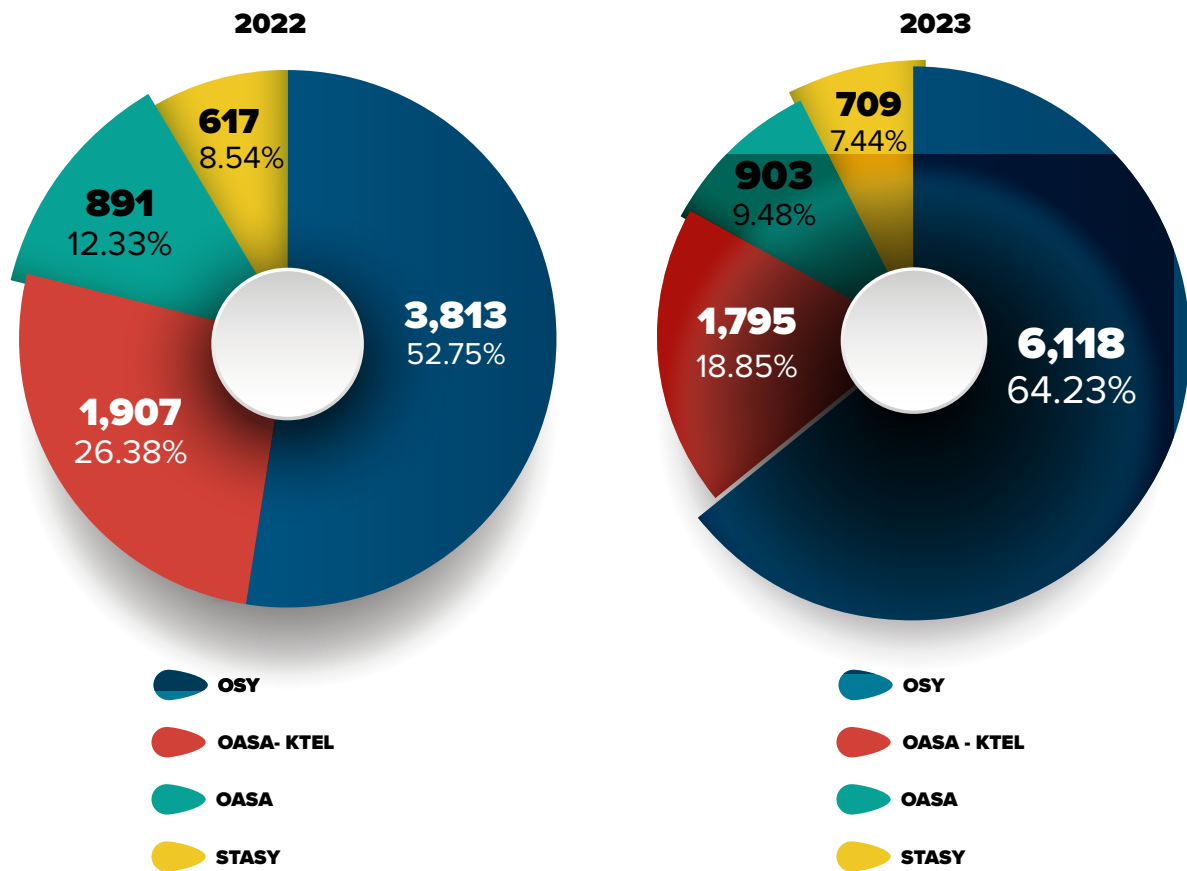
There was a continuous update of the content of the website (whenever required), as well as the database of the new interactive tool, "digital assistant" chatbot (AI), for improved interaction with users / passengers, providing even more useful information and answers, in terms of routes, routes, tickets. In addition, the ability to communicate with live agents (11185 and service center executives) was activated to resolve more specialized issues

Management of Passenger Complaints

In 2023, Athens Transport Group proceeded with the collection, management and transmission of complaints registered:

- In the complaint reception form on the OASA website (total 9,525 entries).
- Through the electronic protocol "PAPYRUS", maintained by the Organization and related to complaints, reports, complaints and suggestions of the traveling public.

Figure 16: Number of complaints per company



Privacy Protection
GRI 2-27, GRI 418-1

The processing of personal data is carried out in accordance with national and European legislation on personal data, but also with the relevant policies of the Group. In particular, the personal data of all parties are protected and processed solely in the context of preventing, detecting or investigating irregular, unethical, illegal or criminal behavior.

The Group implements the necessary technical and organizational measures to ensure a high level of data security, access to information "on a need to know basis", commitment of staff with confidentiality obligations, recording of accesses, monitoring of access and access rights, use of encryption, keeping confidential passwords, in accordance with its applicable policies and procedures.

Within the reporting period, by decision no. 30/2023, the Data Protection Authority imposed on OASA a fine worth € 50,000 for the violation of article 5 par. 2 of Regulation (EU) 2016/679 "on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC".

Sustainable Urban Mobility

Internal Performance Indicator: Number of Routes

Internal Performance Index: Vehicle-kilometers

Internal Performance Indicator: Boardings

Internal Performance Indicator: Kilometric network (km)

Internal Performance Indicator: Number of rows

Sustainable Urban Mobility Plans

According to the legislation, OASA⁸ cooperates with 40 Municipalities of Attica to develop Sustainable Urban Mobility Plans (SUMP). The action continued in 2023, with the formulation of measures and proposals that will promote sustainable modes of transport (walking, cycling) and their combination with urban transport, discouraging the use of private means, so that, cooperatively, they may lead the State to reduce air pollutant emissions and limit the greenhouse effect.

The strategic directions of the action plans mainly concern the improvement and expansion of infrastructure to encourage pedestrian travel, the improvement of bicycle infrastructure, the reduction of motorized traffic, the increase of road safety, the creation of green routes, the increase of transport efficiency, the creation of municipal transport lines, the management of parking, but also the undertaking of actions promoting sustainable modes of transport. These guidelines are specified in packages of measures that are developed, progressively, over the time horizons examined by SUMP.

It is clarified that the elaboration of the actions concerning urban transport of the already approved SUMP by the Municipalities is planned to be done in the light of the Group, under the terms and objectives set in the Attica Strategic Transport Plan, to align the common goals.

The Group has developed a series of internal performance indicators for more effective network monitoring and timely implementation of corrective actions. For 2023, internal performance indicators were as follows:

- Number of Routes: 525,939 STASY and 4,897,296 OSY (including KTEL)
- Vehicle-kilometers: 53,545,537 STASY and 83,412,196 OSY (including KTEL)
- Boardings: 215,118,203 OSY and 236,225,609 STASY
- Mileage network: Buses (5,781 km), Trolleybuses (368 km), Metro (89.9 km), Trams (29.8 km)
- Number of lines: Bus (258), Trolleybus (20), Metro (3), Light Rail (2)

Attica Strategic Transport Plan (SMA)

In 2023, the tender for the award of the Attica Strategic Transport Plan was completed and the contract was signed within the first quarter of 2024. The new SMA aims to improve the quality of life of the citizens of Attica, enhance sustainable mobility, promote green transport and the efficient operation of the Athens Transport System. Particular emphasis will be placed on the interoperability of instruments (OSY, STASY, KTEL, Municipal Transport, etc.) in order to evaluate the supply and demand of transport work. Based on these data, comprehensive proposals for improving mobility in OASA's area of responsibility will be formulated. The project, according to the contractual schedule, will be completed within 2 years and is of key importance for the formulation of a transport policy for the Group for the next 20 years. The project is funded by the Operational Programme "Transport Infrastructure, Environment and Sustainable Development".

Transportation for people with disabilities

The Transportation Service for People with Disabilities of OSY serves those passengers with disabilities who cannot travel with the existing transport network or are destined for areas of the network where vehicles with the required wheelchair access equipment are not routed. This effort aims to ensure the safety of special social groups or categories, but also to avoid their social exclusion.

Specifically, OSY owns 3 specially designed buses that are regularly available to clubs, non-profit companies, as well as disabled sports teams for cultural and sports events. All of OSY's vehicles have low floors, with the possibility of kneeling to the boarding side and the majority of them have a special extended ramp, making it easy to board, even with wheelchairs.

⁸ Law 4784/2021 and Law 4599/2019

In the majority of vehicles, there is a special insured space for placing a wheelchair inside the vehicle, while at the same time the person traveling with a wheelchair can press the stop button to disembark.

For 2023, the specially designed buses were used by 1,918 people and made 3,282 trips to leisure areas, workplaces, schools, hospitals, clinics and areas with sports facilities covering a total of 66,159 vehicle kilometers. Buses were also used to cover the transportation needs of athletes and escorts (715 people) of the Paralympian Committee for People with Disabilities.

Further, STASY ensures that stations and trains on Metro Lines 2 and 3 are friendly to the service of disabled people by providing facilities such as markings on the first and last steps of the fixed staircases, direction indicators and emergency buttons for stopping the operation of escalators. Additional warning markings are also applied – change of floor texture at the edge of the platform, signs and graphs with more legible elements, signs and graphs showing the facilities offered, accessible seats on the platform, double handrails on fixed two-way stairways, CCTV cameras, curb cuts, guides for the blind.

In addition, there are accessible elevators at all stations, recorded announcements in the elevator cabins, intercom with the Station Manager in the elevator cabins, audio announcement of floors, Braille on floor buttons, ramps of altitude changes, existence of special disabled gates, emergency telephones at the levels of ticketing/check-in area and platform, toilets for wheelchair users at all stations and Sidings.

In addition, it has created a mini electronic application, through which every disabled or disabled person can be informed in real time about the operating status of elevators at metro stations.

Improving Accessibility

In June 2022, in order to serve disabled individuals, OASA completed the equipment of 156 stops with high passenger traffic, with 409 special prefabricated overhangs, in order to facilitate embarkation/disembarkation in public transport. These stops are mainly located around fixed track stations, to create an integrated access framework. The project was implemented through E.P.Y.ME.PER.A.A.⁹ of the NSRF 2014-2020.

At the same time, in collaboration with Growthfund - SKEP (Association of Social Responsibility for Children & Youth) and the Group, actions were implemented regarding:

- Evaluation-improvement of website accessibility.
- Update of the website oasa.gr for stops that have a hanging, interactive map.
- Training Program on Accessibility Specifications for Communication Materials.
- Maintenance on the ramps of the available buses.
- Issues related to the regulation of audible announcements at telematics stops.
- Improvement of accessibility at Monastiraki Metro Station.
- Identification of interventions to improve accessibility at Kallithea Metro Station.
- Improvement of accessibility to Metro station platforms (gap between station and platform).
- Improvement of service for passengers with speech and hearing impairments, regarding information issues and use of automatic machines for the purchase of fare products by visually impaired passengers.
- Development of a Disability Index for recording-evaluating the use of public transport by people with disabilities.

⁹ Operational Programme "Transport Infrastructure, Environment and Sustainable Development".

Digital Applications

OASA recognizes the value of digital applications that improve the experience of passengers during their daily transportation with the public transport of the Group's subsidiaries, so it has implemented innovative initiatives that are part of the modernization of services characterized by their digital transformation, specifically OASA has proceeded with:

- The design of new reports and applications in the business Telematics software (skyview) it handles. Indicatively, these concern the display of fare points of sale, the separation of lines according to their transport identity (basic, extraordinary, etc.).
- The improvement of passenger information tools.
- The use of EMV bank cards and mobile phones for public transport transportation for purchase and validation. It concerns the use of bank cards and mobile phones for transportation by public transport (purchase-validation). The means of fare will be the bank card itself, either in physical form or digitally integrated into the mobile phone or other device. The passenger who uses his card for journeys will be charged at the end of the day with an amount depending on his travels, with the choice of the best solution and according to the pricing rules that will be set. In 2022, procedures were carried out to find a technical solution, while in 2023 its development began, with the aim of completing the project within 2024.
- The interoperability of the AFCS with other applications - Implementation of Account Based Ticketing System (ABT) - Mobility as a Service (MaaS). It concerns the implementation of an advanced state-of-the-art system for the provision of mobility services, which will include bank cards, smart cards and mobile phones connected to a user account on the back-end of the Cloud server. With the implementation of the system, the correct and, optimal for the passenger, fare value will be calculated (including features of maximum allowed charge per specific time period or number of trips - fare capping). The implementation of PBT will also form the basis for the implementation of Mobility as a Service (MaaS), so that open interconnection with other BackOffice systems (e.g. mobility partners) is possible and the provision of an interoperability platform for OASA is available. In 2022, procedures were carried out to find a technical solution, while in 2023 its development began, with the aim of completing the project during 2024.
- Implementation of NFC Athena card application for IOS: This functionality is part of the implementation of the Account Based Ticketing System (ABT) - Mobility as a Service (MaaS). With the implementation of this functionality, the passenger carries out, automatically, via a mobile phone equipped with NFC function, the charging process of the fare type.

Quality Assurance

OASA, faithful to its goal of transition to a more "passenger-centric" model and upgrading the quality of its services, from 2020, implements a Quality Control System, in accordance with the European Standard EN 13816:2002 "Transport – Logistics and Services – Public Transport – Definition of Service Quality, Objectives and Measurements".

Standard EN 13816 applies to companies and organizations providing passenger transport services. It concerns the providers of these services, Public Bodies and Authorities, who wish to align public transport with the expectations of passengers and society. It defines the requirements that determine and measure the quality of services provided by Public Transport to passengers and gives guidance on the choice of relevant measurement methods.

OASA, in adherence with the requirements of the EN 13816 Standard, has compiled a series of Quality Indicators, which it monitors with constant frequency, in order to continuously improve the quality of the provided transport work and the satisfaction of its passengers. The implementation of this system is controlled and certified by the independent Certification Body.

Corporate Social Responsibility Actions

In addition to its actions to ensure safe and comfortable transportation of passengers with disabilities, STASY remains sensitive to social and cultural issues, implementing actions for the benefit of both society as a whole and its employees. STASY voluntarily undertakes commitments that go beyond common regulatory and contractual obligations, investing in social development, environmental protection, respect for fundamental rights, as well as a new, comprehensive approach to quality and sustainable development.

In addition, STASY has established partnerships with emblematic organizations, such as the National Theatre, the Greek National Opera, the Athens and Epidaurus Festival, the Athens Concert Hall, the Michael Cacoyannis Foundation, the Athens Development and Tourism Promotion Agency of the Municipality of Athens, as well as companies from the field of culture and entertainment, such as the concert production companies "XLALALA", "Fuzz Productions" and "Highpriority", the theatrical production companies "Performing Arts & Entertainment", "Twilight" and "Melisma NPO", as well as the company "Politis Group", which owns some well-known radio stations in Athens.

Furthermore, STASY organizes and supports in various ways every year a series of activities with a significant positive social impact, providing free multipurpose spaces available at Metro stations, especially at "Syntagma" station. Indicatively, 2023 hosted:

- Exhibition of agricultural products in the framework of actions of the Reconstruction Committee of Northern Evia and the NGO "DIAZOMA".
- Voluntary blood donation of the National Blood Donation Center (E.K.E.A.), within the framework of the program "The 4 seasons of Blood Donation".
- Exhibition - Tribute to the Asia Minor Catastrophe, using audiovisual media" (organised by TIF-Helexpo).
- Historical photography exhibition, organized by the OTE Employee Cultural Center, entitled: "One picture, a thousand words".
- Information campaign on cancer disease in all its aspects, aiming to improve the patient's living conditions through the provision of all possible assistance (organized by KAPA3 - Guidance Center for Cancer Patients).
- Report on the presentation of interactive activities of the Armed Forces by the Hellenic National Defence General Staff (HNDGS).

Also, STASY, due to its activity, can address thousands of citizens daily, either through promotional messages at the METRO and TRAM facilities or through the initiatives organized at the stations. For this reason, many organizations, bodies, and municipalities turn to the company for the promotion of their activities.



05 Governance

5.1 Corporate Governance

GRI 2-9, GRI 2-11

Athens Transport Group operates with a strong commitment to business ethics, transparency, and adherence to regulatory standards. The Boards of Directors (BoD) serve as the highest governing bodies within the Group's companies, overseeing administration and the fulfillment of statutory objectives. The Board of Directors of OASA comprises eight members (six men and two women) who serve four-year terms. This includes three independent non-executive members, one of whom is the Chairman of the BoD. The Board members include representatives from the Ministry of Finance¹⁰ and employees. Additionally, the CEO of OASA is a member of this Board, holds a position on the Board of Directors of STASY, and serves as the President of the Board of Directors of OSY.

Table 12: Board of Directors of OASA

Name	Title	Tenure
Mr. Sardelis Christoforos	Chairman - Independent Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mr. Spiliopoulos Georgios	Chief Executive Officer - Executive Member of the BoD	5/1/2023 – 5/1/2027
Mrs. Antonopoulou Irida	Deputy CEO & Executive Director - Executive Member of the BoD	21/12/2021 – 21/12/2025
Mr. Pantazis Ioannis	Independent Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mrs. Hardouveli Susan Bejian	Independent Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mr. Sakellariadis Konstantinos	Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mr. Angelopoulos Panagiotis-Iason	Non-Executive Member of the BoD	26/4/2022 – 26/4/2026
Mr. Papadopoulos Pavlos	Employee Representative - Non-Executive Member of the BoD	11/11/2021 – 11/11/2025

Audit & Risk Committee

The Audit & Risk Committee is responsible for establishing and maintaining an effective Internal Control System (ICS) to achieve the Group's objective, an essential part of which is the process of preparing and presenting a financial report, free from errors or omissions. This responsibility includes the design by the Management of the Group's companies of certain controls, which prevent or discover cases where process and control systems do not function effectively. In this context, the Group's companies have established an Audit & Risk Committee¹¹, consisting of three non-executive members, two of whom are independent. Commission decisions shall not be made public.

In particular, the Committee is responsible for supporting the BoDs of the Group's companies through the independent and objective monitoring of the ICS and procedures and financial reporting, quality and risk management, the internal audit unit and the supervision of regular audit. Also, the Committee is responsible for regularly informing the Management, submitting its recommendations/proposals, which are related both to the monitoring of the financial reporting process and the ICS and the procedures designed, implemented and monitored by the Management of the Group's companies.

More information is available on the Financial Statements for the Fiscal Year 2023

¹⁰ BoD Decision 5015/2024

¹¹ BoD Decision 4954/2023

Procedure for the Selection and Appointment of the Members of the Board of Directors.

GRI 2-9 (c-vii), GRI 2-10

The selection of members for the Board of Directors of OASA is conducted by the Shareholder (Growthfund) through its nomination committee. As the sole shareholder, Growthfund evaluates and selects executives with diverse and sufficient experience to implement OASA's strategic objectives. This includes expertise in the transport sector¹², both academically and professionally, to mitigate negative impacts and enhance positive outcomes from the Group's activities.

The composition of the Board of Directors of OASA considers the opinions of the Ministry of Finance and the employees, who are represented on the Board. OASA also prioritizes diversity, in line with Growthfund's Strategic Plan 2022-2024, ensuring that 25% of the Board members are women. Additionally, the Board maintains independence according to corporate governance laws and policies to avoid conflicts of interest.

Evaluation and Training of BoD Members

GRI 2-17, GRI 2-18

Regarding the evaluation of the members of the Board of Directors of OASA, Growthfund sets annual targets, including those related to the Group's sustainable development. These targets are monitored and evaluated through corresponding performance indicators (KPIs). The evaluation indirectly affects the BoD members, as their bonuses depend on achieving these targets. Specifically, Growthfund evaluates performance annually, either through the Portfolio Manager or its Sustainable Development Team, with audits conducted throughout the year to track progress.

Following the evaluation, depending on the performance achieved, decisions may be made to accelerate, re-prioritize goals and actions, or take corrective measures to align the Group with its targets. This may include changes in the composition of the Board of Directors and the adoption of new practices and policies. However, to date, any corrective actions and changes implemented have not been directly due to the achievement or non-achievement of these objectives.

Finally, there is no formal framework for the training and skills development of Board members. However, they do participate in seminars and e-learning programs organized by Growthfund, which cover topics such as sustainable development.

Conflict of interest

GRI 2-15 (a)

Given the nature, activities, and responsibilities of the Athens Transport Group, it is crucial to avoid and manage situations that could lead to conflicts of interest. The Group's Code of Ethics and Professional Conduct specifically addresses conflicts of interest, which occur when the private or personal interests or relationships of an executive, employee, or partner compete directly or indirectly with the interests of the Group.

A conflict of interest is any situation that may unfairly affect the Group's ability to act in the best interests of OASA and its subsidiaries in an objective and impartial manner. All employees are obligated to avoid any conduct that constitutes or could potentially constitute a conflict of interest, both in their professional duties and personal activities outside the Group.

Employees must investigate potential conflicts of interest within their scope of work, including those involving their family members. To prevent actual or potential conflicts of interest, the Group has established policies for the avoidance of such conflicts. These policies apply to Board members, executives, employees, and associates, outlining the rules and procedures for identifying and managing these situations. As of 2023, Board members are required to submit annual statements of personal status in accordance with the relevant directive from the Shareholder (Growthfund) for the prevention, detection, and management of conflicts of interest.

Additionally, all employees must be familiar with the Group's applicable policies and immediately notify the Company's Compliance Officer in writing about any significant personal interests that may be affected by the Group's transactions or decisions, as well as any other conflicts of personal interest that arise in the course of their duties.

¹² In accordance with the procedure set out in article 197 paragraph 4 of Law 4389/2016

Determination of remuneration

GRI 2-19 (a-i, b), GRI 2-20 (a)

The Group's companies have, approved by the General Meeting, a Remuneration Policy of the BoD members¹³ which has been accepted by Growthfund. In the determination of remuneration there was no participation of the independent members of the Board of Directors of the Group's companies, nor was there an independent committee to oversee the process, as well as the involvement of external consultants.

The Policy provides for annual variable remuneration for the CEOs of OASA, OSY and STASY and the Deputy CEO - Executive Director of OASA, which is linked to the achievement of specific goals, including those of sustainable development, which are equally distributed. More specifically, at least 4 goals are set, based on the Growthfund's Strategic Plan. 2 qualitative objectives, one of which is related to the improvement of corporate governance, and 2 quantitative objectives decided by the Board of Directors of each company.

¹³ Decision of the General Assembly 1/2020 and 1/2023

5.2 Business Ethics



Material topic: Business ethics

GRI 3-3

Financial Opportunities
Existing anti-bribery and anti-corruption policies, as well as the ability for OASA to benefit from effective, accountable and inclusive institutions.
Financial Risks
Due to the absence of processes for shaping a responsible business culture based on business ethics.

Code of Ethics and Professional Conduct

GRI 2-23 (c,d,e,f), GRI 2-24

The Code of Ethics and Professional Conduct serves as a daily guide for the professional conduct of the Group's employees. It is supported by relevant policies, guidelines, and procedures, and clearly outlines the ethical principles, values, and internal rules that must be adhered to by everyone with an employment or cooperation relationship with the Group. Through its Code of Ethics and Professional Conduct and accompanying policies, the Group mitigates potential financial risks associated with the lack of responsible business culture processes.

Compliance with the values, principles, and rules set forth in the Code, which is approved by the Board of Directors of OASA, is a collective responsibility. The Code provides guidelines for subsidiaries, which are required to establish and implement their own policies and procedures to meet these standards, always in alignment with the principles, values, and rules of the Code.

However, since it is impossible to foresee every possible situation and behavior, employees must exercise good judgment and avoid inappropriate conduct. To ensure compliance with the Code, all employees, regardless of their hiring date, are required to fully understand its rules and principles, undergo appropriate training, and commit to its observance by signing a Personal Commitment.

Until 2023, OASA has provided compliance and business ethics training for Management members and executives at the General Management, Directorate, and Department levels. At STASY, Compliance/Business Ethics workshops are conducted for all employees at local workplaces, with approximately 600 employees trained to date. Additionally, due to the dispersed nature of OSY employees (drivers), Business Ethics training has been provided to selected executives up to the rank of Deputy Director.

Furthermore, within the framework of the Code of Conduct, corporate policies have been developed to reflect the appropriate behavior expected of the Group's employees and the framework within which they are to perform their duties. Specifically, the Group's companies have developed the following policies:

Table 13: Policies of Athens Transport Group companies

OASA	Code of Ethics & Professional Conduct
	Policy Against Corruption and Bribery
	Gift and Friendship Policy
	Policy against Violence and Harassment at Work
	Petitions Policy and Reporting Procedure - Whistleblowing
	Sponsorship and Donation Policy
	Third Party Due Diligence Policy (ongoing)
OSY	Code of Ethics & Professional Conduct
	Gift and Hospitality Policy
	Policy against Violence and Harassment at Work
	Policy Against Corruption and Bribery
	Reporting Policy
	Sponsorship and Donation Policy
	Report Management Process - Whistleblowing
STASY	Regulatory Compliance System Framework
	Gift and Hospitality Policy
	Sponsorship and Donation Policy
	Policy Against Corruption and Bribery
	Code of Ethics and Professional Conduct
	Policy against Violence and Harassment at Work
	Reporting Policy
	Report Management Process - Whistleblowing
Third Party Due Diligence Policy (ongoing)	

Furthermore, OASA establishes its business ethics framework through the Charter of Obligations to the Consumer (COC)¹⁴. The COC outlines the statutory obligations and conditions under which the public enterprise provides its products or services to consumers, as well as the procedures for compensating consumers in cases of non-compliance with these obligations and terms. Additionally, it is essential for the Directorates of OASA to implement the principles of the Code. These commitments are emphasized in operational plans and translated into specific projects and actions. OASA also includes specific terms in its contracts, such as ensuring contractors comply with labor legislation, and provides employee training on a case-by-case basis as needed.

The Code of Ethics and Professional Conduct, the COC and the policies of OASA are available on the website <https://www.oasa.gr>, the policies of OSY are available on the website <https://www.osy.gr> and the Code of Ethics and Professional Conduct and the policies of STASY are available on the website <https://www.stasy.gr>.

Reporting mechanisms

GRI 2-16(a), GRI 2-25 (b), GRI 2-26

The Group has developed a Reporting Policy in order to set the framework for the effective, transparent and fair process of disclosure and settlement of reports related to employment relations, incidents of violence and harassment, fraud, corruption, abuse of power, bribery, violation of gift and hospitality policy, conflict of interest, forgery, threat, extortion, use of force, discriminatory treatment of employees, unethical behavior and other irregularities, omissions or criminal acts that may arise in the operations of the Group. The purpose of the Policy is to create the framework for their early detection and

¹⁴ Every public enterprise that offers products or services to consumers is obliged to draw up and submit to the Interministerial Committee of Public Enterprises and Organizations, a Charter of Obligations to the Consumer (CSE).

to define the principles and operating framework under which the Group receives, manages and investigates reports that have come to the attention of its staff or third parties and concern:

- Members of the Board of Directors,
- Employees,
- Partners, suppliers and anyone providing services,
- Third parties who have relevant information about any unlawful acts.

The Group takes all reports of possible misconduct seriously and in any case, the confidentiality of the report is ensured, and an investigation is carried out in order to identify any violations. For each violation, the necessary corrective measures and relevant sanctions are taken, which are determined in accordance with the nature of the violation, the applicable law and the employment/cooperation contracts. The communication channels used by the Group's companies to collect requests and complaints are the following:

- Complaint management system for passengers (call center 11185, chatbot, complaint submission form on the OASA website).
- Contact/complaint form (websites OASA, STASY, OSY).
- Petition platform, accessible at <https://safevoice.Growthfund.gr>.
- To be sent to the email address of each company.
- To be sent by post to the address of each company, to the attention of the Compliance Officer, with the indication "Confidential".
- To be submitted in writing or orally directly to the Compliance Officer of each company.

The above communication networks operate as "lines" of communication of reports and are available all days and hours of the week, in addition, the Group's companies have, based on Law 4990/2022, appointed a Reporting Receipt and Follow-up Officer (RRFO). Any expression of protest, dissatisfaction, opinion and/or complaint, not submitted through the reporting process may not be treated as a reference by the Group's companies. In 2023, STASY handled 12 employee complaints, of which 11 concerned labor and personal relations issues, while 1 report was deemed a vague complaint by the Whistleblowing Committee. Accordingly, OSY handled 1 employee report on employment and personal relations issues.

The Reporting Policy is available here: <https://oasa.gr>, <https://www.osy.gr>, <https://stasy.gr>.

Bribery and Corruption

GRI 2-27, GRI 205-3, TR-RA-520a.1

Corruption and bribery are among the most serious challenges facing modern businesses globally. They threaten good governance, undermine economic and social development, and distort free competition. To fulfill its mission of providing high-quality, safe, and efficient passenger transport services, the Group upholds high values and principles.

Integrity and transparency are paramount and apply to every aspect of the Group's operations. Any form of corruption or bribery, as well as behaviors, acts, or omissions that could endanger the Group or even create the suspicion of corruption or bribery, are not tolerated. Recognizing the importance of combating corruption and bribery, and demonstrating its unwavering commitment to zero tolerance for such practices, the Group has established a "Policy Against Corruption and Bribery."

This Policy applies to all employees and associates of the Group's companies, regardless of their position, including Board members and any third parties acting on their behalf. It emphasizes that compliance with the current legal and regulatory framework to combat corruption and bribery is everyone's responsibility. The Group prohibits any form of corruption and bribery and maintains zero tolerance for any behavior or suspicion of behavior that violates this Policy.

In 2023, there were no violations of applicable laws during the Group's operations, no confirmed incidents of corruption leading to the termination of employees or business contracts, and no public legal cases related to corruption against the Group or its employees. Additionally, there were no monetary damages resulting from legal proceedings related to unfair competition regulations.

Our Policy Against Corruption and Bribery is available here <https://oasa.gr>, <https://www.osy.gr>, <https://stasy.gr>



06 Appendix



6.1 About the Sustainable Development Report

GRI 2-2, GRI 2-3, GRI 2-5

This annual Sustainable Development Report is the second published by Athens Transport Group (hereinafter referred to as the "Group") and was published on December 24, 2024. The report contains information related to the Group's activities in Greece and in particular in Attica, including its subsidiaries Road Transport S.A. and Urban Rail Transport S.A., and presents qualitative and quantitative information on its management approach and performance in the field of sustainable development. The Group aims to inform its stakeholders about the impact it has or may create on the environment, people and the economy, and to contribute to the formation of a basis for comparing its performance in the field of sustainable development. The report is published and available in digital form on the company's website <https://www.oasa.gr/>.

This report covers the reporting period from January 1, 2023 to December 31, 2023, in line with the annual financial reporting period of the Group companies. It has been prepared with reference¹⁵ to the 2021 GRI Standards, taking into account the Road Transportation Sustainability Accounting Standard (2018-10 edition) and the Rail Transportation Sustainability Accounting Standard (2018-10 edition) issued by the Sustainability Accounting Standards Board (SASB). The report takes into account the Group's broader contribution to the UN Sustainable Development Goals (SDGs).

More information on the content and materiality analysis of the Group's sustainable development topics is available on pages 32-37. The GRI Content Index is available on pages 78-80.

The Group has not proceeded with external assurance of the content of the Report, recognizes the importance of this process and is considering obtaining external assurance for subsequent Reports.

Athens Transport Group considers the opinion of all stakeholders regarding the content of this report important. For more information or clarifications, please get in touch with the following contact using the below details:

Email: oasa@oasa.com
Metsovou 15,
106 82 Athens

¹⁵ Athens Transportation Group has reported the information cited in this GRI content index for the period 01.01.2023-31.12.20223 with reference to the GRI Standards.

6.2 GRI Content Index

Declaration of Use	Athens Transport Group has reported the information cited in this GRI content index for the period 1.1.2023 to 31.12.2023 with reference to the GRI Standards.
GRI 1 used	GRI 1: Foundation 2021

GRI Standard	Disclosure	Report Page / Citation
General disclosures		
GRI 2: General Disclosures 2021	2-1: Organizational details	9
	2-2: Entities included in the organization's sustainability reporting	77
	2-3: Reporting period, frequency and contact point	77
	2-4: Restatements of information	92
	2-5: External assurance	77
	2-6: Activities, value chain and other business relationships	9-10,16-17
	2-7: Employees	48, 81-82
	2-9: Governance structure and composition	69-70
	2-10: Nomination and selection of the highest governance body	70
	2-11: Chair of the highest governance body	69
	2-12 (a,b-i): Role of the highest governance body in overseeing management of impacts	29
	2-13(a): Delegation of responsibility for managing impact	29
	2-14: Role of the highest governance body in sustainability reporting	33
	2-15 (a): Conflicts of interest	70-71
	2-16(a): Communication of critical concerns	73-74
	2-17: Collective knowledge of the highest governance body	70
	2-18: Evaluation of the performance of the highest governance body	70
	2-19 (a-i,b): Remuneration policies	71
	2-20 (a): Process to determine remuneration	71
	2-21 (a, c): Annual total compensation ratio	48-50,92
	2-22: Statement on sustainable development strategy	5
	2-23 (c,d,e,f): Policy commitments	72-73
	2-24: Embedding policy commitments	72-73
	2-25 (b): Processes to remediate negative impacts	73-74
	2-26: Mechanisms for seeking advice and raising concerns	73-74
	2-27: Compliance with laws and regulations	63, 74-75
	2-28: Membership associations	18
	2-29: Approach to stakeholder engagement	30-31
	2-30: Collective bargaining agreements	48

Material topics		
GRI 3: Material topics 2021	3-1: Process to determine material topics	32-36
	3-2: List of material topics	37
Material topic: Climate change mitigation		
GRI 3: Material topics 2021	3-3: Management of material topics	39,42
GRI 302: Energy 2016	302-1: Energy consumption within the organization	39-40, 83
GRI 305: Emissions 2016	305-1: Direct (Scope 1) GHG emissions	39-40, 84-85
	305-2: Energy indirect (Scope 2) GHG emissions	39-41,84-85
Internal Performance Indicator	Use of refrigerants	41,84-85
Material topic: Circular economy		
GRI 3: Material topics 2021	3-3: Management of material topics	43-44
GRI 306: Waste 2020	306-1 (a-i): Waste generation and significant waste-related effects	43-44
	306-2 (b,c): Management of significant waste-related impacts	43-44
	306-3: Waste generated	43-44, 86-87
OSY Internal Performance Index	Waste generated	43-44,87
Material topic: Working conditions and employee development		
GRI 3: Material topics 2021	3-3: Management of material topics	46,48-49, 51-52,56-59
GRI 401: Employment 2016	401-1: New employee hires and employee turnover	54-55,88-89
	401-2 (a-i, a-ii, a-iv): Benefits provided to full-time employees that are not provided to temporary or part-time employees	48-49
GRI 403: Health and Safety 2018	403-1: Occupational health and safety management system	56
	403-2: Hazard identification, risk assessment and incident investigation	56-57
	403-3: Occupational health services	58
	403-4: Worker participation, consultation and communication on occupational health and safety	56-57
	403-5: Worker training on occupational health and safety	58-59
	403-6: Promotion of worker health	58
	403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	58-59
	403-9 (a,e,f): Work-related injuries	59,89-91
GRI 404: Training and Education 2016	404-1 (a-i): Average hours of training per year per employee	53-54,92
	404-2(a): Programs for upgrading employee skills and transition assistance programs	53-54
GRI 405: Diversity and equal opportunities 2016	405-1: Diversity of governance bodies and employees	σελ 93-95
	405-2: Ratio of basic salary and remuneration of women to men	σελ 48-51, 95

Material topic Working conditions and human rights in the value chain		
GRI 3: Material topics 2021	3-3: Management of material topics	46,59
GRI 414: Social Supplier Evaluation 2016	414-1: New suppliers that were screened using social criteria	59
Material topic: Safety of passengers and users		
GRI 3: Material topics 2021	3-3: Management of material topics	60-61
GRI 416: Consumer Health and Safety 2016	416-2 (a-i): Incidents of non-compliance concerning the health and safety impacts of products and services	60-61,95
Material topic: Customer and user rights and privacy		
GRI 3: Material topics 2021	3-3: Management of material topics	60-63
GRI 418: Customer Privacy 2016	418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	63
Material topic: Sustainable urban mobility		
GRI 3: Material topics 2021	3-3: Management of material topics	60,64-67
Internal Performance Indicator	Number of Routes	64
Internal Performance Indicator	Vehicle-kilometres	64
Internal Performance Indicator	Boardings	64
Internal Performance Indicator	Mileage network (km)	64
Internal Performance Indicator	Number of rows	64
Material topic: Business ethics		
GRI 3: Substantive Issues 2021	3-3: Management of material topics	72-75
GRI 205: Anti-corruption 2016	205-3: Confirmed incidents of corruption and actions taken	74-75

6.3 SASB Index

SASB Road Transportation / Rail Transportation Index	Category	Report Page / Citation
TR-RO-110a.1: Gross global Scope 1 emissions	Quantitative	39-41
TR-RO-110a.3: (1) Total fuel consumed, (2) percentage renewable	Quantitative	83
TR-RO-320a.1: (1) Total recordable incident rate (TRIR) for (a) direct employees	Quantitative	89-91
TR-RO-320a.2: (1) Voluntary and involuntary turnover rate for all employees	Quantitative	88-89
TR-RO-320a.3: Description of approach to managing short-term and long-term driver health risks	Quality	56-57
TR-RO-520a.1: Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations	Quantitative	74-75
TR-RO-540a.1: Number of accidents and incidents	Quantitative	59

6.4 Key ESG Performance Indicators (KPIs)

Human Resources Data

GRI Standards 2021	Disclosure	2023					2022					2021				
		Women	Men	Total	Other	Not disclosed	Women	Men	Total	Other	Not disclosed	Women	Men	Total	Other	Not disclosed
GRI 2-7	Employees by gender, type of work and region															
	OASA															
	Total employees	53	52	105	0	0	56	52	108	0	0	54	55	109	0	0
	Permanent	53	52	105	0	0	56	52	108	0	0	54	55	109	0	0
	Temporary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Non-guaranteed working hours	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total full-time and part-time employees	53	52	105	0	0	56	52	108	0	0	54	55	109	0	0	

Material topic: Climate change mitigation

GRI Standards/ SASB Road Transportation / Rail Transportation	Disclosure	Unit of measurement	2023	2022	2021
	STASY				
	Energy Consumption within the Organization				
GRI 302-1 TR-RO-110a.3	Fuel consumption within the organization from non-renewable energy sources	MJ	9,818,836.95	12,233,891.85	14,938,123.77
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	693,402,080.93	657,417,481.20	582,759,532.80
	Total energy consumption within the organization	MJ	703,220,917.88	669,651,373.05	597,697,656.57
	OSY				
	Energy Consumption within the Organization				
GRI 302-1 TR-RO-110a.3	Fuel consumption within the organization from non-renewable energy sources	MJ	1,247,106,670.01	1,327,081,214.59	1,211,330,646.60
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	87,678,655.17	97,586,701.20	86,859,551.92
	Total energy consumption within the organization	MJ	1,334,785,335.18	1,424,667,915.79	1,298,190,198.51
	OASA				
	Energy Consumption within the Organization				
GRI 302-1 TR-RO-110a.3	Fuel consumption within the organization from non-renewable energy sources	MJ	490,820.13	482,299.71	490,841.29
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	896,536.80	1,001,408.40	983,444.40
	Total energy consumption within the organization	MJ	1,387,356.93	1,483,708.11	1,474,285.69
	Total				
GRI 302-1 TR-RO-110a.3	Fuel consumption within the organization from non-renewable energy sources	MJ	1,257,416.327.09	1,339,797,406.15	1,226,759,611.66
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	781,977,272.90	756,005,590.80	670,602,529.12
	Total energy consumption within the organization	MJ	2,039,393,599.99	2,095,802,996.95	1,897,362,140.77

Notes:

- The Group and its subsidiaries do not produce or sell any form of energy.
- For OASA, fuel consumption from non-renewable energy sources includes heating oil and natural gas.
- The calculation methodology and conversion factors used are based on the ISO 14064 Report Template, guidelines from the Ministry of Environment and Energy, and the 5th IPCC Report (Intergovernmental Panel on Climate Change).

GRI Standards 2021	Disclosure	Unit of measurement	2023	2022	2021
STASY					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	t CO ₂ e	1,814.46	1,986.97	947.54
	Biogenic CO ₂ emissions	t CO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 location based)	t CO ₂ e	48,790.13	63,420.46	Not available information
	Indirect greenhouse gas emissions (Scope 2 market based)	t CO ₂ e	70,121.60	97,534.62	70,862.89
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	0,76	0.69	Not available information
OSY					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	t CO ₂ e	98,585.86	110,638.17	96,152.63
	Biogenic CO ₂ emissions	t CO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 location based)	t CO ₂ e	6,169.37	9,414.09	Not available information
	Indirect greenhouse gas emissions (Scope 2 market based)	t CO ₂ e	8,866.67	14,477.99	10,562.02
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	7.32	11.22	7.49
OASA					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	t CO ₂ e	34.64	35.34	35.31
	Biogenic CO ₂ emissions	t CO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 location based)	t CO ₂ e	63.08	96.61	Not available information
	Indirect greenhouse gas emissions (Scope 2 market based)	t CO ₂ e	90.66	148.57	119.59
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	0	0.00035	Not available information
TOTAL					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	t CO ₂ e	100.434,96	112.660,48	97.135,48
	Biogenic CO ₂ emissions	t CO ₂ e	0	0	0

GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 location based)	t CO ₂ e	55,022.58	72,931.16	Not available information
Indirect greenhouse gas emissions (Scope 2 market based)	t CO ₂ e	79,078.93	112,161.18	81,544.50	
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	8.08	11.91	7.49

Notes:

- The year 2022 was chosen as the base year for calculating direct Scope 1 and indirect Scope 2 greenhouse gas emissions, in accordance with Greek climate law. Emissions for previous years have been recalculated using the methodology proposed by the Ministry of Environment and Energy.
- For calculating direct Scope 1 greenhouse gas emissions within the company and indirect Scope 2 market-based emissions, the guidelines from the "ISO 14064 Report Template v.1.1.xlsm" prepared by the Ministry of Environment and Energy during the 5th IPCC Assessment were followed.
- The consolidation method used is "Financial Control."
- According to the HCAP methodology for the location-based approach, the emission factor is derived from reports prepared and published by DAPEEP (production mix factor).
- For 2023, the emission factor is 252.4414 g CO₂/KWh, as reported in the DAPEEP Report (June 2024) - Energy Production Mix 2023. For 2022, the factor is 346.4218 g CO₂/KWh, as reported in the DAPEEP Report (June 2023) - Energy Production Mix 2022. Data for the location-based approach are not available for 2021.
- For the market-based approach, the factors from the Residual Energy Mix of each company's supplier have been used, based on the Ministry of Environment and Energy's instructions for the 2023 Carbon Footprint Reports.
- Since DAPEEP's calculations cover only carbon dioxide emissions, the coefficients for CH₄ and N₂O from the climate law implementation guidelines are used for both market-based and location-based approaches.

Material topic: Circular economy

GRI Standards 2021	Disclosure	Unit of measurement	2023	2022	2021
STASY					
GRI 306-3	Waste generated				
	Hazardous waste				
	13 02 05: Mineral-based non-chlorinated engine, gear and lubricating oils	t	2.78	5.43	4.24
	13 05 07: Water contaminated by petroleum products	t	0.35	Not available information	
	15 01 10: Packaging containing residues of or contaminated by hazardous substance	t	0.58	0.27	0.29
	15 02 02: Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances	t	1.51	1.59	2.18
	16 01 07: Oil filters	t	0.26	0.31	0.29
	16 02 13: Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	t	0.54	0.41	1.86
	16 02 15: Hazardous components removed from discarded equipment	t	0.10	0.23	0.20
	16 05 04: Gases in pressure containers (including halons) containing hazardous substances	t	0.92	1.36	3.32
	16 05 08: Organic chemical materials discarded consisting of or containing dangerous substances	t	0.15	0.00	0.12
	16 06 01: Lead batteries	t	33.41	16.21	55.87
	16 06 02: Ni-Cd batteries	t	1.43	3.55	0.00
	16 06 06: Separately collected electrolyte from batteries and accumulators	t	0.71	0.00	0.20
	20 01 21: Fluorescent tubes and other mercury-containing waste	t	3.86	3.12	3.46
	20 01 33: Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	t	0.17	0.15	0.30
	20 01 35: Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	t	1.07	0.31	0.20
	Total hazardous waste	t	47.84	32.94	72.53
	Non-hazardous waste				
	15 01 01: Paper and cardboard packaging	t	14.28	16.04	0.00
	15 01 02: Plastic packaging	t	61.15	133.84	0.00
	15 01 04: Metallic packaging	t	26.49	39.58	0.00
	15 01 05: Composite packaging	t	0.67	0.73	0.00
15 01 06: Mixed packaging	t	163.12	138.06	127.50	
15 01 07: Glass packaging	t	80.76	104.,37	0.00	

GRI 306-3	16 01 03: End-of-life tyres	t	1.15	Not available information	
	16 01 17: Ferrous metal	t	64.76	48.99	5.02
	16 01 18: Non-ferrous metal	t	0.48	0.00	0.48
	16 01 99: Waste not otherwise specified	t	32.71	33.34	142.00
	16 01 20: Glass	t	0,00	0.00	0.00
	16 02 11: Discarded equipment containing chlorofluorocarbons HCFC, HFCs	t	Not available information	0,00	0.00
	17 01 07: Mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	t	Not available information	79.91	0.00
	17 04 02: Aluminium	t	0.50	0.00	2.57
	17 04 11: Cables other than those referred to in item 17 04 10	t	0.00	0.00	0.87
	17 09 04: Construction and demolition test mixtures (except those included in 17 09 01 to 03)	t	142.50	Not available information	
	19 10 01: Iron or steel waste (from shredding of metal-containing waste)	t	2.31	Not available information	
	20 01 23: Discarded equipment containing chlorofluorocarbons	t	0.00	0.00	0.00
	20 01 36: Electrical and electronic equipment other than that referred to in points 20 01 21 , 20 01 23 and 20 01 35 discarded	t	1.30	0,72	0,30
	20 01 40: Metals	t	0.00	0.00	209.20
	20 02 01: Biodegradable waste	t	245.15	231.10	232.20
	20 03 07: Bulky waste	t	0.00	0.00	0.00
	Total non-hazardous waste	t	837.33	826.68	720.14
	Total non-hazardous and hazardous waste	t	885.07	859.62	792.67

Note: The data were sourced from the Electronic Waste Registry (EWR) and pertain to waste management through off-site disposal. All waste is removed from the facilities by properly licensed collectors for further management at appropriately licensed facilities. The category 'waste' 15 01 02: Plastic packaging, refers to the quantities collected under the rewarding recycling framework, totaling 60.76 t. The term "Non-ferrous metals" refers to electrified supports.

Internal Performance Indicator	Material	Unit Measurement	2023	2022	
OSY					
Internal Performance Indicator: Generated waste	Waste Lubricants-Oils	t	0.13	0.12	
	Old non-useful empty metal barrels	Pcs.	741	457	
	Used vehicle tyres	t	201.81	75.66	
	Vehicle accumulators	t	28.70	40.22	
	Old non-useful metal materials (scrap)	Scrap iron	t	47.06	36.82
		Copper	t	1.42	0.56
		Aluminium	t	0.32	0.00

Note: The increase in waste quantities compared to 2022 is due to their more complete recording at OSY's depots.

Material topic: Working conditions and employee development

GRI Standards/ SASB Road Transportation / Rail Transportation	Disclosure	Unit of Measur- ment	<30 years old			30-50 years old			>50 years old		
			Women	Men	Total	Women	Men	Total	Women	Men	Total
GRI 401-1 TR-RO- 320a.2	New employee hires and turnovers										
	2023										
	OASA										
	Number of employees	#	0	0	0	22	25	47	31	27	58
	Number of new employee hires	#	0	0	0	0	1	1	0	0	0
	Rate of new hires	%	0.00	0.00	0.00	0.00	4.00	2.13	0.00	0.00	0.00
	Number of employee turnover	#	0	0	0	0	0	0	2	1	3
	Rate of employee turnover	%	0.00	0.00	0.00	0.00	0.00	0.00	6.45	3.70	5.17
	OSY										
	Number of employees	#	4	48	52	88	1,857	1,945	93	2,659	2,752
	Number of new employee hires	#	0	42	42	6	96	102	16	8	24
	Rate of new hires	%	0.00	87.50	80.77	6.82	5.17	5.24	17.20	0.30	0.87
	Number of employee turnover	#	1	43	44	0	51	51	1	123	124
	Rate of employee turnover	%	25.00	89.58	84.62	0.00	2.75	2.62	1.08	4.63	4.51
	STASY										
	Number of employees	#	5	13	18	310	1,080	1,390	304	829	1,133
	Number of new employee hires	#	3	3	6	15	59	74	123	92	215
	Rate of new hires	%	60	23	33.3	4.8	5.4	5.3	40.4	11	18.9
	Number of employee turnover	#	0	0	0	0	8	8	10	46	56
	Rate of employee turnover	%	0.00	0.00	0.00	0.00	0.7	0.57	3.29	5.5	4.9
	TOTAL										
	Number of employees	#	9	61	70	420	2,962	3,382	428	3,515	3,943
	Number of new employee hires	#	3	45	48	21	156	177	139	100	239
	Rate of new hires	%	33.33	73.77	68.57	5.00	52.66	52.33	32.47	28.45	60.61
	Number of employee turnover	#	1	43	44	0	59	59	13	170	183
	Rate of employee turnover	%	11.11	70.49	62.85	0.00	19.91	17.44	30.37	48.36	46.41
	2022										
	OASA										
	Number of employees	#	0	0	0	24	26	50	30	23	53
	Number of new employee hires	#	0	0	0	2	3	5	0	0	0
	Rate of new hires	%	0.00	0.00	0.00	8.33	11.54	10.00	0.00	0.00	0.00
	Number of employee turnover	#	0	0	0	1	0	1	0	6	6
	Rate of employee turnover	%	0.00	0.00	0.00	4.17	0.00	2.00	0.00	26.09	11.32
	OSY										
	Number of employees	#	4	22	26	88	2,032	2,120	73	2,555	2,628
	Number of new employee hires	#	1	4	5	1	33	34	0	0	0
Rate of new hires	%	25.00	18.18	19.23	1.14	1.62	1.60	0.00	0.00	0.00	
Number of employee turnover	#	0	7	7	2	50	52	4	119	123	
Rate of employee turnover	%	0.00	31.82	26.92	2.27	2.46	2.45	5.48	4.66	4.68	

GRI 401-1 TR-RO- 320a.2	STASY										
	Number of employees	#	9	24	33	327	1,155	1,482	158	646	804
	Number of new employee hires	#	1	1	2	4	6	10	6	4	10
	Rate of new hires	%	11.11	4.17	6.06	1.22	0.52	0.67	3.80	0.62	1.24
	Number of employee turnover	#	0	0	0	2	4	6	5	47	52
	Rate of employee turnover	%	0.00	0.00	0.00	0.61	0.35	0.40	3.16	7.28	6.47
	TOTAL										
	Number of employees	#	13	46	59	439	3,213	3,652	261	3,224	3,485
	Number of new employee hires	#	2	5	7	7	42	49	6	4	10
	Rate of new hires	%	15.38	10.87	11.86	1.59	1.31	1.34	2.30	0.12	0.29
	Number of employee turnover	#	0	7	7	5	54	59	9	172	181
	Rate of employee turnover	%	0.00	15.22	11.86	1.14	1.68	1.62	0.35	5.33	5.19
	2021										
	OSY										
	Number of employees	#	4	34	38	97	2,268	2,365	67	2,451	2,518
	Number of new employee hires	#	4	41	45	12	387	399	1	0	1
	Rate of new hires	%	100.00	120.59	118.42	12.37	17.06	16.87	1.49	0.00	0.04
	Number of employee turnover	#	0	6	6	4	70	74	1	97	98
	Rate of employee turnover	%	0.00	17.65	15.79	4.12	3.09	3.13	1.49	3.96	3.89
	STASY										
Number of employees	#	1	18	19	361	1,245	1,606	141	624	765	
Number of new employee hires	#	2	16	18	6	131	137	0	0	0	
Rate of new hires	%	200.00	88.89	94.75	1.66	10.52	8.53	0.00	0.00	0.00	
Number of employee turnover	#	0	0	0	0	0	0	2	41	43	
Rate of employee turnover	%	0.00	0.00	0.00	0.00	0.00	0.00	1.42	6.57	5.62	

Note: For OASA, data are not available for the year 2021.

GRI Standards 2021	Disclosure	Unit Measurement	2023	2022	2021
403-9 TR-RO- 320a.1(2-a)	OASA				
	Workplace-related injuries				
	Employees				
	Number of hours worked	#	183,907	187,488	189,224
	Number of fatalities as a result of work-related injury	#	0	0	0
	Rate of fatalities as a result of work-related injury	%	0.00	0.00	0.00
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	0
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	0.00
	Number of recordable work-related injury	#	0	0	0
Rate of recordable work-related injuries (IR)	%	0.00	0.00	0.00	

403-9 TR-RO- 320a.1(2-a)	Workers who are not employees				
	Number of hours worked	#	20,720.0	24,496.5	20,869.5
	Number of fatalities as a result of work-related injury	#	0	0	0
	Rate of fatalities as a result of work-related injury	%	0.00	0.00	0.00
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	0
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	0.00
	Number of recordable work-related injury	#	0	0	0
	Rate of recordable work-related injuries (IR)	%	0.00	0.00	0.00
	OSY				
	Employees				
	Number of hours worked	#	8,207,021	Not available information	
	Number of fatalities as a result of work-related injury	#	0	Not available information	
	Rate of fatalities as a result of work-related injury	%	0	Not available information	
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	Not available information	
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0	Not available information	
	Number of recordable work-related injury	#	69	15	20
	Rate of recordable work-related injuries (IR)	%	0	Not available information	
	STASY				
	Workplace-related injuries				
	Employees				
	Number of hours worked	#	Not available information	4,090,228	4,071,333
	Number of fatalities as a result of work-related injury	#	0	0	1
	Rate of fatalities as a result of work-related injury	%	0.00	0.00	0.25
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	0
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	0.00
	Number of recordable work-related injury	#	31	16	17
	Rate of recordable work-related injuries (IR)	%	Not available information	3.91	4.18

		TOTAL			
GRI 403-9 TR-RO- 320a.1(2-a)	Employees				
	Number of hours worked	#	Not available information	4,277,716	4,260,557
	Number of fatalities as a result of work-related injury	#		0	1
	Rate of fatalities as a result of work-related injury	%		0.00	0.25
	Number of high-consequence work-related injuries (excluding fatalities)	#		0	0
	Rate of high-consequence work-related injuries (excluding fatalities)	%		0.00	0.00
	Number of recordable work-related injury	#		31	37
	Rate of recordable work-related injuries (IR)	%		3.91	4.18
	Workers who are not employees				
	Number of working hours	#	Not available information	24,496.5	20,869.5
	Number of deaths caused by workplace-related injuries	#		0	0
	Indicator of deaths caused by workplace-related injuries	%		0.00	0.00
	Number of very significant workplace-related injuries (excluding fatalities)	#		0	0
	Indicator of very significant workplace-related injuries (excluding fatalities)	%		0.00	0.00
	Number of recorded workplace injuries (recordable)	#		0	0
Recorded workplace injuries index (recordable)	%	0.00		0.00	

Notes:

- For calculating the "Recorded Workplace Injuries Index (recordable)" as per GRI 403-9, a coefficient of 1,000,000 man-hours was used for OSY and STASY, and a coefficient of 200,000 man-hours for OASA.
- The data on the company's performance in Health and Safety issues includes all employee groups. Data is collected using reporting tools and in collaboration with safety technicians.
- For the years 2021 and 2022, the totals refer to the companies OASA and STASY.

GRI 2-4

GRI Standards 2021	Disclosure	Unit of measurement	2023		2022	
			Women	Men	Women	Men
GRI 404-1	Average training hours per employee					
	OASA					
	Average employee training hours	#	14.88	10.36	7.98	2.96
	OSY					
	Average training hours per employee	#	8.21	7.68	2.25	1.49
	STASY					
	Average training hours per employee	#	38.27	25.43	29.87	14.72
Total						
Average training hours per employee	#	30.32	12.92	20.19	9.36	

Note: The company has modified the methodology of calculating the average training of employees by gender. Therefore, the performance of 2023 is not comparable to that of 2022.

Material topic: Diversity and Equal Opportunities

GRI Standards 2021	Disclosure	Unit of measurement	2023	2022
GRI 2-21	Annual total compensation ratio (CEO/Employees)			
	OASA			
	Annual total compensation ratio (CEO/Employees)	#	3.77	4.01
	OSY			
	Annual total compensation ratio (CEO/Employees)	#	Not available information	2.81
STASY				
Annual total compensation ratio (CEO/Employees)	#	3.29	3.32	

Note:

- The annual total remuneration of CEOs includes the salary based on a uniform salary scale (level of education, marital status and number of children).
- The annual remuneration of employees includes the salary based on a uniform salary scale (level of education, marital status and number of children) and variable remuneration from overwork.

GRI Standards 2021	Disclosure	Unit of measurement	Women	Men
GRI 405-1	Composition of governance bodies and analysis of employees by employee and gender			
	2023			
	Board of Directors of OASA	%	25.00	75.00
	Board of Directors of OSY	%	0.00	100.00
	Board of Directors of STASY	%	28.57	71.43
	OASA			
	By employee level			
	Management	%	50.00	50.00
	Employees	%	49.49	50.51
	OSY			
	By employee level			
	Senior Management	%	19.3	80.77
	Middle Management	%	11.07	88.93
	By function			
	Executives	%	34.33	65.67
	Production executives	%	1.76	98.24
	Technical employees	%	0.96	99.04
	STASY			
	By function			
	Executives	%	37.14	62.86
	Operation employees	%	21.09	78.91
	Technical employees	%	2.66	97.34
	Administrative employees	%	53.90	46.10
	2022			
	Board of Directors of OASA	%	25.00	75.00
	Board of Directors of OSY	%	0.00	100.00
	Board of Directors of STASY	%	25.00	75.00
	OASA			
	By employee level			
	Management	%	50.00	50.00
	Employees	%	50.00	50.00
	OSY			
By employee level				
Senior Management	%	20.00	80.00	
Middle Management	%	12.78	87.22	
By function				
Executives	%	32.36	67.64	
Production executives	%	1.57	98.43	
Technical employees	%	1.01	98.99	
STASY				
By function				
Executives	%	35.14	64.86	
Operation employees	%	20.81	79.19	
Technical employees	%	3.28	96.72	
Administrative employees	%	52.30	47.70	

GRI Standards 2021	Disclosure	Unit of measurement	<30 years old	30 – 50 years old	>50 years old
GRI 405-1	Composition of governance bodies and analysis of employees by hierarchy and age group				
	2023				
	Board of Directors of OASA	%	0.00	0.00	100.00
	Board of Directors of OSY	%	0.00	20.00	80.00
	Board of Directors of STASY	%	0.00	42.86	57.14
	OASA				
	By employee level				
	Management	%	0.00	0.00	100.00
	Employees	%	0.00	48.45	51.55
	OSY				
	By employee level				
	Senior Management	%	0.00	42.30	57.70
	Middle Management	%	0.00	34.31	65.69
	By function				
	Executives	%	0.29	33.73	67.97
	Production executives	%	0.63	41.55	57.82
	Technical employees	%	3.06	41.34	55.60
	STASY				
	By function				
	Executives	%	0.00	40.71	59.29
	Operation employees	%	1.45	53.60	44.95
	Technical employees	%	0.00	58.84	41.16
	Administrative employees	%	0.00	52.92	47.08
	2022				
	Board of Directors of OASA	%	0.00	0.00	100.00
	Board of Directors of OSY	%	0.00	20.00	80.00
	Board of Directors of STASY	%	0.00	66.67	33.33
	OASA				
	By employee level				
	Management	%	0.00	0.00	100.00
	Employees	%	0.00	46.00	54.00
	OSY				
By employee level					
Senior Management	%	0.00	48.00	52.00	
Middle Management	%	0.00	36.99	63.01	
By function					
Executives	%	0.32	39.16	60.52	
Production executives	%	0.61	45.95	54.28	
Technical employees	%	0.33	43.48	56.19	
STASY					
By function					
Executives	%	Information not available			
Operation employees	%	Information not available			
Technical employees	%	Information not available			
Administrative employees	%	Information not available			

Notes:

- For the year 2022, the number of employees at STASY used for the GRI 405-1 disclosure differs from those used for the GRI 2-7 disclosure because the data were recorded on different dates, and the company's workforce changes frequently.
- Age group data for STASY were not available for 2022.

GRI Standards 2021	Disclosure	2023	2022	2021
GRI 405-2	Ratio of basic salary and earnings of women to men			
	By employee level			
	OASA			
	Management	0.77	0.83	Information not available
	Employees	1.04	1.09	
	OSY			
	Senior Management	1.03	0.99	0.95
	Middle Management	1.05	1.02	1.01
	Employees	Information not available		
	By function			
	OSY			
	Executives	1.02	0.95	0.94
	Production executives	0.90	0.91	0.92
	Technical employees	0.87	0.97	0.97
	STASY			
	Executives	0.89	0.96	0.97
Operation employees	0.82	0.94	0.96	
Technical employees	0.87	0.95	0.97	
Administrative employees	0.94	0.92	0.97	

Notes:

- For OASA, the data are reflected per employee level. Basic salary data for women and men per function for the year 2022 were not available.
- For OSY, basic salary data for women and men at the employee level were not available for the years 2022 and 2023.
- For STASY, data are reported per function. Basic salary data for women and men per hierarchy level for the year 2022 were not available.

Material topic: Safety of passengers and users

GRI Standards 2021	Disclosure	Unit of measurement	2023	2022
GRI 416-2	Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services			
	OSY			
	Incidents of non-compliance with regulations resulting in a fine or penalties	#	0	1

Notes:

- The requirements of GRI 416-2 disclosure do not apply to OASA, as its operation includes administrative activities.
- No data are available for STASY for the years 2021-2023.





