



ΥΠΕΡΤΑΜΕΙΟ
ΕΘΝΙΚΟ ΕΠΕΝΔΥΤΙΚΟ ΤΑΜΕΙΟ
GROWTHFUND
THE NATIONAL FUND OF GREECE

Accessibility: Building value for all by removing barriers

Expectations of companies

Expectations Document #2

Person on a bicycle and
person on a wheelchair train
together in nature

Introduction

Accessibility is a topic that can affect any stakeholder group. Typically, we think of the needs of employees and customers in terms of how they access and experience the organisation, but in fact, accessibility is relevant for anyone who interacts with a company: its customers, suppliers, partners, regulators and investors.



Young blind woman with white cane and a guide dog crossing the road



Middle age grey-haired disabled woman having video call sitting on wheelchair at home

Accessibility in the workplace

In the workplace, accessibility is fundamentally the removal of barriers to ensure no employee is excluded from taking an active and engaged role in working life. To be in line with international best practice standards,

employers should ensure their physical workplace, and the way they work – the workplace culture – is accessible to as many people as possible.

“We expect our investee companies to use initiatives such as **training and pilot projects and actively collaborate with relevant stakeholders** to ensure accessibility is increasingly integrated into corporate strategies.”

This means addressing accessibility across every aspect of the workplace, including the built environment, its interiors and the digital realm. We expect our investee companies to use initiatives such as training and pilot projects and actively collaborate with relevant stakeholders to ensure accessibility is increasingly integrated into corporate strategies. This not only empowers employees to succeed in their professional lives, but also allows business leaders to identify strategic opportunities from the untapped value that accrues from inclusive cultures.

By actively managing for a more accessible workplace using awareness and engagement, companies will help bring about social change while building value for their own organisations. Under the umbrella of diversity and inclusion, accessibility remains a core value which, when actively engaged with, has the power to transform corporate cultures.

Offering accessible products and services to customers and citizens

Companies are investing in their future each time they develop universally accessible products and services in response to a customer (or citizen) touchpoint. We subscribe to this belief at Growthfund, and we observe similar emphasis being put on progressive business cultures that promote fairness by other investors in their risk management engagement and stewardship activities. The drive to remove bias and provide equal opportunities in both the physical and digital realms is usefully informed by involving underserved groups and their representatives to ensure that advice is up-to-date and based on lived experience.

“Accessibility refers to all parts of a service, digital and physical, including **public and internal systems, call centres, face-to-face meetings and the buildings that these are held within.** Often, it is a lack of awareness that results in services being inaccessible.”

Engaging users from the Service Design

Universal design describes the approach to developing products and environments to be usable by people of all ages and abilities to the greatest extent possible, without the need for adaptation or specialised design. The 2011 World Report on Disability states that universal design is fundamental to inclusion and that it offers a practical and affordable solution to wider maximum accessibility. We expect our existing and future investee companies to be familiar with its potential and to work towards adopting a systemic approach to integrating universal design into their operations.

By designing accessible services for the widest range of people, everyone benefits. Special attention to navigation, ease of use and text clarity are among best practices online. Accessibility refers to all parts of a service, digital and physical, including public and internal systems, call centres, face-to-face meetings and the buildings that these are held within. Often, it is a lack of awareness that results in services being inaccessible. We therefore recommend that our investee companies engage actual users and NGOs when they are in the design phase. People with disabilities should be consulted about barriers they face and be involved finding solutions.

The expectations within this document are top-line guidance for companies and are to be used as communications tools while they deepen and accelerate their commitments to champion inclusive growth and prosperity. Ultimately, we understand each company is on its own journey, so this document outlines our expectations over the long term.



Successful businesswoman in wheelchair leading meeting

Accessibility and disability

Despite the growing business case, as outlined above, many companies are still struggling to make meaningful advancements on accessibility, but statistics prove this needs to change. Greece’s employment rate of workers aged **55 to 64** was **42.6%** in December 2020: organisations need to futureproof themselves and ensure they can meet the needs of these older employees.

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It is now more than 70 years since the UN’s Declaration on Human Rights and it is important for companies to address accessibility, including communication access, as a human rights issue. Transitioning to a more accessible environment which benefits employees and customers can mean transformative change and we therefore expect companies to interact with civil society, hold consultations and consider the views of all those with disabilities, including non-visible conditions, in the design and testing phases of their products.

Visible disability and non-visible conditions: Disabilities can occur in many different forms with some having few or no visible signs. It is expected leaders understand the broad number of visible conditions (such as mobility difficulties) and non-visible conditions (such as Asperger’s Syndrome). We expect this awareness should be supported with training initiatives for employees to encourage engagement with affected groups, where appropriate seeking their input in designing solutions.

Accessibility at work affects people at different stages of life, such as women returning to work post childbirth and the ageing workforce, some of whom will acquire disabilities while they are in their roles. In situations like these, the wider workforce needs to be engaged and helped to empathise with the unseen challenges they may not personally experience through specific education and training initiatives. Companies should endeavor to keep equality and diversity training fresh, relevant and up-to-date.

Policies and regulation addressing barriers to access

Greece has ratified most of the major international conventions in terms of access to employment for people with disabilities.

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The new and strengthened Strategy for the Rights of Persons with Disabilities 2021-2030 intends to tackle the diverse challenges that people with disabilities face, while the National Plan of Action on the Rights of People with Disabilities sets clear and measurable targets for dealing with the complexities of disability. We expect companies to formulate an objective-led strategy which aligns with these frameworks.

Quota scheme: The Greek employment law ‘Provision for the employment of special social groups and other clauses’, defines the quota scheme for the private and the public sector. A new law has passed which gives flexibility on the way companies hire their people. As with all employment law legislation, we urge our companies to prepare for its implementation.

Article 27 of the United Nations Convention on the Rights of Persons with Disabilities: The CRPD “recognizes the right of persons with disabilities to work on an equal basis with others”. It also prohibits all forms of employment discrimination, promotes access to vocational training, promotes opportunities for self-employment and calls for reasonable accommodation in the workplace, among other provisions.



Father carries a stroller down the stairs without ramp for the disabled and baby prams



Man with disability in wheelchair in front of stairs

Offering accessible transport services

Transport plays a significant role within the sphere of accessibility, and we acknowledge the social values which some of our companies have as their foundations which already focus on accessibility for all within this sector. To transition forwards, we expect our companies to continuously engage with disabled groups and those with hidden disabilities to understand their needs and empower them to co-design solutions.

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Building awareness and engagement with those experiencing a disability or hidden disability can include:



• **Auditing:** Regular surveys are advised on customer satisfaction to ascertain important feedback.



• **Initiatives:** Assistance phone numbers for those who need help embarking and disembarking from public transport, e.g., travel mentor schemes.

It should be considered that easily accessible transport services for those with disabilities become more useable for all passengers as their ease of navigation and comfort increases.

Real estate asset management and development, hospitality and leisure business units

“Research shows that there is widespread **public awareness of the legal requirement for accessibility** within real estate, but people who do not have disabilities frequently do not realise just **how inaccessible buildings are** in reality for those coping with disabilities.”

We urge companies within these industries to assess the physical access to their buildings, as well as the services provided within them.

Research shows that there is widespread public awareness of the legal requirement for accessibility within real estate, but people who do not have disabilities frequently do not realise just how inaccessible buildings are in reality for those coping with disabilities

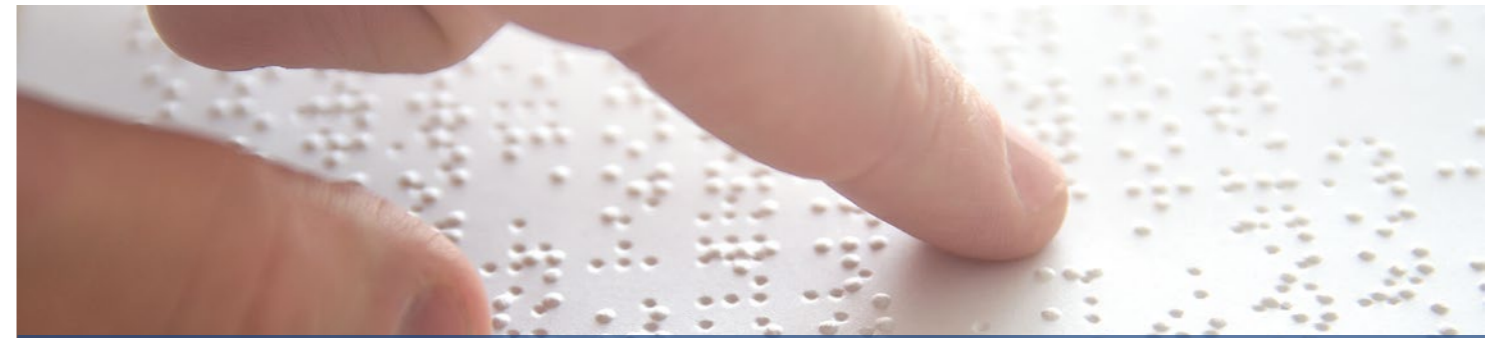
In contrast to this lack of understanding is the overwhelming acknowledgement that there is commercial value in providing a fully accessible built environment, given the large number of people living with a disability or acquiring a disability as the population ages. In that context, we expect leaders to advocate:

- **Enhancing the public’s awareness** of good practice when it comes to showcasing the accessibility of the built environment.
- **Ascertaining the complex combination of needs** to meet the access requirements of different disabilities.
- **Commissioning accessibility audits:** It can be difficult for organisations to know what good practice is in the provision of facilities for workers, visitors or other users – or, indeed whether they have met their obligations to make reasonable adjustments.

Infrastructure (ports, coastal, canals, etc.), concessions contracts.

Accessibility is too often designed around the unimpaired with later concessions made for those with disabilities. Infrastructure accessibility constantly needs to be updated and improved so that new developments are not missed. As such, we expect our companies to:

- **Improve their knowledge and understanding** of the requirements of people with disabilities. For example, attempts to prevent cycle access to pavements at kerb ramps also restricts wheelchair users.
- **We also expect that all tender and contract documents** explicitly incorporate the principles of universal accessibility.
- **Expand user input:** People with reduced mobility should be involved in the design, planning and implementation processes. This includes building awareness and forming partnerships with affected groups. This will also help ensure there are no missed opportunities within each project.



Hand of a person reading braille text

Accessible communication materials for customers and citizens

“We expect our companies to respond appropriately to create **high-quality online experiences for all their customers by conducting an audit of their digital systems to assess accessibility compliance.** These findings should be used to improve system compliance and help protect organisations from legal action.”

Communication materials must be accessible to all. This means that any documents should be written in plain language that is easy to understand or in braille for people with visual impairment. It also means that there should be no barriers to digital communication that prevents access to websites, digital tools and technologies. Companies should strive to ensure their technology is accessible to individuals with auditory, cognitive, neurological, physical, speech, and visual disabilities.

To ensure an all-encompassing approach, it is suggested leaders think about accessibility from the start and communicate to staff at all levels that accessibility is a team responsibility. Factors to consider include:

- Text facilities for the deaf and audible services for the visually impaired
- Content and design should be clean and simple
- Meeting government accessibility requirements under Article 27 (see above)
- Establishing a task force to assess digital accessibility, led by disabled users

Digital accessibility within services: Most consumers begin their dining and travel experiences online, which has forced the sector to digitise, particularly in the wake of the pandemic. We expect our companies to respond appropriately to create high-quality online experiences for all their customers by conducting an audit of their digital systems to assess accessibility compliance. These findings should be used to improve system compliance and help protect organisations from legal action. All systems must be accessible to those with impaired vision, motor difficulties, cognitive impairments or learning disabilities, deafness or impaired hearing. We also expect there to be accessibility training for employees so that when aiding individuals with impairments, employees can be confident. It is vital to remember guests may have special preferences and requests.

It is often argued ROI is hard to measure when it comes to spending on digital accessibility modifications. However, accessible designs provide benefits that ultimately increase sales because it is possible to:

- Reach a larger customer base that includes the disabled population
- Make mobile access easier
- Improve SEO rankings
- Drive innovation

Promoting inclusivity and diversity in the workplace to improve accessibility

“To ensure that progress is made to a specific timetable, **introducing quota systems can support positive action.** Such quotas could support women returning from maternity leave who want to continue their career progression, for example.”

Attitudes can be as much of a barrier to the inclusion of disabled people as physical structures, but studies in unconscious bias show that people can be unaware of their negative attitudes towards certain groups, including those living with disabilities. Leaders should actively promote and model inclusive attitudes, which should be supported by a revision of company policies with handbooks to reinforce the importance of inclusion. A dedicated taskforce that meets regularly to discuss diversity and inclusion best practice would be a useful addition.

Creating a truly accessible environment means supporting people with different impairments or needs so they can work successfully and progress. To ensure that progress is made to a specific timetable, introducing quota systems can support positive action. Such quotas could support women returning from maternity leave who want to continue their career progression, for example.

Employee Training: Training is fundamental within this sector if employees are to understand what must be done and why. This should include:

- **Experiential training:** One example is where employees are asked to travel blindfolded to experience the obstacles faced by someone with visual impairments with the objective of suggestions for improvements.
- **Discussions:** Talking about barriers faced by people experiencing disabilities and hidden disabilities, covering attitudinal, environmental and organisational barriers.
- **Communication skills:** How to communicate with people with disabilities, for example, children with autism or those with a hearing impairment.

Practical measures to support employees with physical disabilities: Under Greek law there are many practical measures employers are already expected to implement to assist this group. These include flexible working as well as the assistance of suitable tech equipment. Naturally, companies' buildings need to be accessible for wheelchair users and we expect all leaders to understand the relevance of these measures and engage with affected groups to understand how best to accommodate any additional needs.



Man with disability sitting on a wheelchair while talking with computer



Cheerful young Down Syndrome waiter in restaurant

Actions already pursued by Growthfund and its investees

Growthfund respects the rights of customers and users and provides high-quality services, utilizing innovative practices. The rights of customers and users reflect the Growthfund's commitment to transparent, ethical and responsible operation, enhancing trust.

Pilot Project to Enhance Accessibility at Monastiraki Metro Station

Growthfund in cooperation with its subsidiary Athens Transport Group, established a very important pilot project for its subsidiaries regarding accessibility at Monastiraki Metro station, aiming at promoting social inclusion of People with Disabilities.

- A survey was conducted among a targeted group of People with Disabilities (PWD), with the support of the Association of Social Responsibility for Children and Youth (SKEP), to identify accessibility barriers faced by users with disabilities in public transport.

- An accessibility audit of Monastiraki Metro station was carried out, focusing on use by wheelchair users, people with visual impairment or blindness and people with autism.

- The elevators in the metro stations of STASY were marked on Google maps.

- Experiential training was carried out for 30 employees, including bus drivers, station managers, transport planning executives, who, through simulation, experienced the reality of people with disabilities in public transport.

- A Digital Accessibility seminar was held, organized by Growthfund in collaboration with the NPO «Me Alla Matia»

- Growthfund funded the necessary mild interventions (signage, installation of a guide for the blind, etc.) to improve accessibility at Monastiraki Metro Station which was completed in December 2022.

- The development of QR codes in collaboration with «This is Athens» was discussed in order to provide a narrative when navigating blind people within the Monastiraki Metro station.

- An indicator for people with disabilities was developed by Athens Transport Group in order to record the use of public transport by people with disabilities.

These actions are a guide for the Athens Transport Group for similar actions, during the publication period of this phase similar actions are being implemented at the «Kallithea» station.



Transport for Athens Group provides information to passengers, through telephone and electronic service, regarding their information on the Group's issues and the provision of the required information, which is always given in cooperation with its competent services. Furthermore, the company implements actions to enhance and improve accessibility and mobility for people with disabilities. Specifically, the company implements the following actions:

Telematics: 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.

Digital Assistant Tool - chatbot (AI): «Artificial intelligence» program that interacts with users/passengers, providing helpful information and answers on routes, schedules and tickets. In addition, it enables Contact Live Agents (11185 and Service Center executives) to resolve more specialized topics.

Accessibility and transportation for people with disabilities

Athens Transport enhanced the accessibility of its services and carried out an accessibility audit on its websites. The Transportation Service for disabled people of OSY serves those who cannot move with the existing transport network or are destined for areas of the network where vehicles with the required wheelchair access equipment are not routed. Also, 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. Athens Transport Group also implements actions to further enhance sustainable urban mobility as

follows:

- Cooperation with 40 Municipalities of Attica to develop Sustainable Urban Mobility Plans (SUMPs).
- Implementation of the new Attica Strategic Transport Plan (ASTP).



HPPC pursues customer service and satisfaction through the provision of advanced services focused on the safety and inclusion of property users. Interaction with customers, in terms of services, is conducted both in person and online, with communication occurring through the Company's website, social media and through customer satisfaction surveys.

Accessibility audits

Furthermore, HPPC conducts accessibility audits of the Business Units at regular intervals, while accessibility to people with disabilities has been ensured. Furthermore, HPPC offers electronic ticketing services at Parnassos Ski Centre and 3D Virtual Tours for people with limited access to the Achilleion Museum and Diros Caves.

At the same time, in the context of customer safety and inclusion, HPPC has developed detailed terms of use of electronic tickets and facilities for the Business Units in Diros Caves, Achilleion Museum, Parnassos Ski Centre and Voras Kaimaktsalan Ski Centre.

Digital Accessibility

HPPC's website ensures seamless and equal access for all users, with or without disabilities, from any type of device or software and aims to improve the experience of all online visitors. The content of the website has been designed to be functional, comprehensible and technically compatible with regard to navigation programs (e.g. screen readers for blind people). The notable difference of this action lies in the good cooperation of ETAD with AMKE «Me Alla Matia», which carried out the evaluation of the website through the use of focus groups of end users, disabled and/or disabled people in collaboration with specialized technicians, while the evaluations of the website are regularly repeated to indicate and immediately implement any technical corrections required.



ELTA Group, with a sense of responsibility towards society, adopts actions that strengthen vulnerable groups, with social character being a priority and is cultivated through the actions undertaken by the

Group's companies for social solidarity.

Free postal services for visually impaired people

ELTA supports visually impaired people by providing them with free postal services. Specifically, ELTA distributes free of charge, postal items, weighing up to 7 kg, sent from/to people with severe visual impairments (i.e. 80% disability rate) or from/to institutions/associations for the blind. The benefit concerns the following:

- Correspondence, literature in any form, audio documents.

- Equipment or material to assist such persons in coping with their disability, including specially adapted CDs, Braille writing equipment, Braille watches, white sticks and recording equipment.

It is also noted that these items are not subject to storage fees, while letters to blind persons are excluded from presentation to customs and the submission of a declaration.



Organization of Central Markets and Fisheries (OKAA)

, which operates in the Rentis Vegetable Market, the Meat Market, the Consumer Market and the 11 Fish Scales throughout Greece, in collaboration with the AMKE «Me Alla Matia», implemented an evaluation program of the premises of KAA with the aim of further facilitating consumers with disabilities who visit its facilities, adopting the implementation of all the foreseen European accessibility standards, in the Organization's facilities and stores for an even more «friendly» market for People with Disabilities.

The evaluation was carried out by a focus group of disabled people and scientists in the field so that the end user has the first say, always in accordance with the existing legislation and European directives.

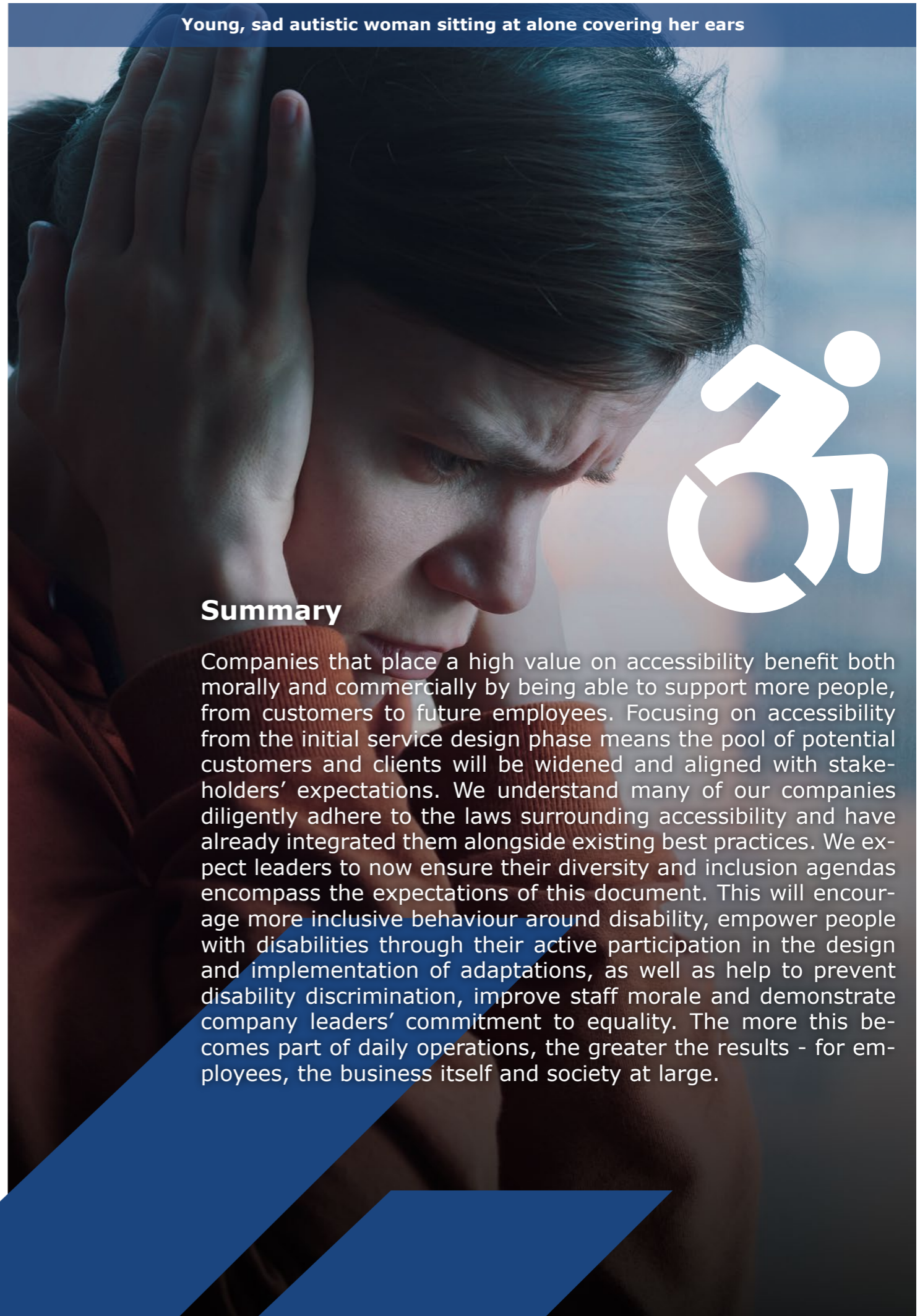


Corinth Canal (AEDIK) created a digital museum for the development & exploitation of the History and Cultural value of the Canal, providing the public with the possibility to visit it online and have interactive experiences that present with rich material the evolution of the canal over the centuries.



Community of diverse people

Young, sad autistic woman sitting at alone covering her ears



Summary

Companies that place a high value on accessibility benefit both morally and commercially by being able to support more people, from customers to future employees. Focusing on accessibility from the initial service design phase means the pool of potential customers and clients will be widened and aligned with stakeholders' expectations. We understand many of our companies diligently adhere to the laws surrounding accessibility and have already integrated them alongside existing best practices. We expect leaders to now ensure their diversity and inclusion agendas encompass the expectations of this document. This will encourage more inclusive behaviour around disability, empower people with disabilities through their active participation in the design and implementation of adaptations, as well as help to prevent disability discrimination, improve staff morale and demonstrate company leaders' commitment to equality. The more this becomes part of daily operations, the greater the results - for employees, the business itself and society at large.

Glossary for basic accessibility terms

We expect leaders to understand the preferred language around certain disabilities, such as 'visual impairment' rather than blind, and we suggest this forms part of staff training.

Accessibility: Accessibility is fundamentally the removal of barriers to ensure no employee is excluded from taking an active and engaged role in working life. Employers should ensure their workplace, and the way they work, is accessible to as many people as possible. This means addressing accessibility across every aspect of the workplace, including the physical environment and the digital realm.

Ageism: Stereotyping and discriminating against individuals based on their age.

Article 27 of the United Nations Convention on the Rights of Persons with Disabilities: The CRPD "recognises the right of persons with disabilities to work on an equal basis with others, furthermore, the CRPD prohibits all forms of employment discrimination, promotes access to vocational training, promotes opportunities for self-employment and calls for reasonable accommodation in the workplace, among other provisions."

Bias: Attitudes for or against a person, group or concept especially in a way considered to be unfair.

Disability: This refers to the interaction between individuals with a health condition (e.g., cerebral palsy, Down's syndrome and depression) and personal and environmental factors (e.g., negative attitudes, inaccessible transportation and public buildings, and limited social supports).

Digital accessibility: Digital accessibility is the inclusive practice of removing barriers that prevent interaction with, or access to websites, digital tools and technologies.

Companies should strive to ensure their technology is accessible to individuals with auditory, cognitive, neurological, physical, speech, and visual disabilities. It includes web accessibility.

Discrimination: The behavior or action (usually negative) against a certain individual or group based on their shared characteristics. Discrimination can happen because of conscious prejudice or unconscious bias.

Equality: The state in which everyone is treated the same way, typically working with the assumption that everyone starts out on equal footing with equal opportunities.

Hidden disability: An umbrella term that refers to a physical, mental, or neurological disability a person is experiencing that is not visible by others and / or is not immediately apparent.

Identity-first language: This is less- widely acceptable than person-first language. An example is "disabled person", which means you identify their disability first.

Impairment is a reduced physical or mental faculty. It becomes disabling when the individual is prevented from participating fully in society because of environmental and social barriers.

Inclusion: The practice of including people in a way that is fair for all, values everyone, and empowers each person to be themselves.

Neurodiversity: This describes the idea that people experience and interact with the world around them in many different ways; there is no



Man in a wheelchair, crossing a pedestrian crossing

one "right" way of thinking, learning, and behaving, and differences are not viewed as deficits. The word neurodiversity refers to the diversity of all people, but it is often used in the context of autism spectrum disorder (ASD), as well as other neurological or developmental conditions such as ADHD or learning disabilities.

Person-first language: An example is "person with a disability". This implies that they are a person first and just happen to be disabled. It puts emphasis on the person and implies that their disability is only one part of who they are and is not the focus.

Universal design: The process of designing products and environments that are usable by all people (inclusive of abilities, disabilities, and different characteristics or the needs different people may have) to the greatest extent possible.

Web accessibility: This refers to the principle that websites and the technologies associated with them should be equally accessible to everyone, regardless of their disabilities.

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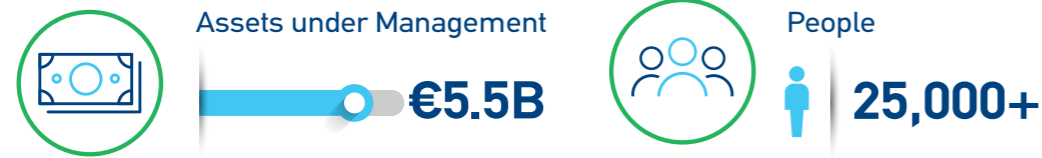
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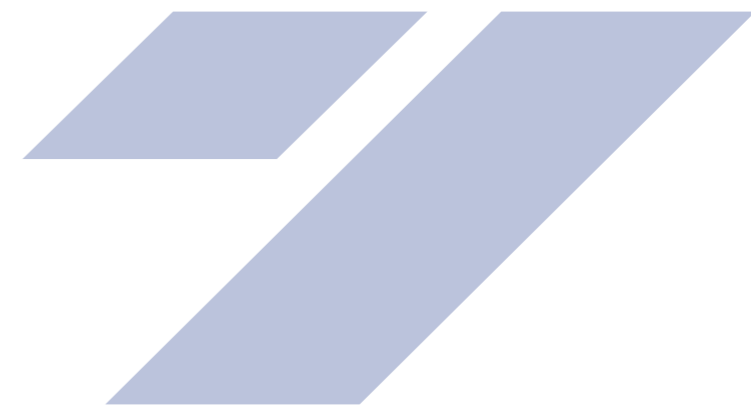


GROWTHFUND

THE NATIONAL FUND OF GREECE



- Energy
- Food & Supply
- Real Estate management
- Transportation & Infrastructure
- Technology
- Postal Services



Growthfund is a holding company established in 2016 with the Greek State as its Sole Shareholder, represented by the Minister of Finance. Its mission, as the National Fund of Greece, is to play an active role in modernizing State-Owned Enterprises, to maximize the value of public property, to provide improved services to citizens and consumers, and to contribute to the national economy. Growthfund's portfolio consists of its subsidiaries and participations in State-Owned Enterprises operating in key sectors of the Greek economy, such as Real Estate: Hellenic Republic Asset Development Fund (HRADF), Public Properties Company (ETAD), GAIAOSE, and TIF-HELEXPO, Energy: PPC, Transportation & Infrastructure: Athens International Airport, Transport for Athens Group, Corinth Canal (AEDIK), and 23 Regional Airports, Food Supply: CMT, CMFO, and Hellenic Saltworks, Technology: 5G Ventures (PHAISTOS), and Postal Services: Hellenic Post Group. The value of assets under management currently amounts to €5.5 billion, while the Group's total workforce is over 25.000 people.

* It is noted that for HFSF, Growthfund has no powers, as the decisions for the accomplishment of its mission and purpose are made exclusively by the relevant bodies of HFSF.

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