

TELEWORK POLICY

PEOPLE TRANSFORMATION DEPARTMENT



ΕΝΕΡΓΕΙΑ & ΥΠΗΡΕΣΙΕΣ
ΚΟΙΝΗΣ ΩΦΕΛΕΙΑΣ



ΤΡΟΦΙΜΑ &
ΕΦΟΔΙΑΣΜΟΣ



ΔΙΑΧΕΙΡΙΣΗ ΑΚΙΝΗΤΩΝ



ΜΕΤΑΦΟΡΕΣ & ΥΠΟΔΟΜΕΣ



ΤΕΧΝΟΛΟΓΙΑ



ΤΑΧΥΔΡΟΜΙΚΕΣ
ΥΠΗΡΕΣΙΕΣ

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1. Purpose of the Policy

The purpose of this policy is to establish the rules and conditions for the provision of telework by the personnel of the Hellenic Corporation of Assets and Participations S.A. ("the Company").

The Company aims to implement a flexible approach to work organization with a focus on employee health and safety, while also enabling employees to perform their duties in the most efficient manner, regardless of their work location.

2. Eligibility and Framework for Providing Telework

This policy applies to specific employees for whom the Company will permit the provision of telework:

The employer provides technical support to the employee for the performance of telework and undertakes to repair or replace the computer provided by the Company and used by the employee for telework in the event of malfunction. This obligation does not extend to devices owned by the employee. The Company will not compensate the employee for damage to equipment that belongs to the employee.

The Company reserves the right, and the employee agrees, that the Company may offset any amount the employee may be entitled to due to the provision of telework against the employee's additional remuneration exceeding the legal minimum (e.g., expenses related to the use of the employee's home workspace, telecommunications costs, etc.).

3. Conditions for Participation in the Telework Program & Employee Obligations

If an employee is included in the telework program under the applicable framework, the Company will inform the employee of the telework days for each period and the duration of the telework program. These days may be modified based on operational needs, following notification to the employee. At the end of the specified duration, the telework arrangement will be evaluated by the Company to determine whether to renew the telework agreement, agree on potential adjustments, etc.

The employee must hold a position compatible with telework. In this context, employees with duties that, by their nature, cannot be performed remotely will not be eligible for the telework program. Participating employees must be capable of working independently.

Employees providing telework services must have a corporate computer unless otherwise agreed with the Company. They must also have access to a telephone line and internet. Additionally, employees are required to care for the Company's equipment and avoid causing any damage to it.

During their working hours, employees must be accessible and adhere to the usual procedures of the Company and their department for tracking working time and requesting leave.

Employees are required to comply with applicable occupational safety regulations to ensure the safety of their home workspace and to avoid risks to their own safety or the Company's technological equipment.

Employees agree that the equipment or other assets provided by the Company remain the Company's property and are to be used exclusively for work related to the Company, not for personal or other purposes. Family members or third parties must not use the Company's equipment or assets.

The Company reserves the right to access the employee's work-related communications, files,

and information, as well as the equipment used by the employee, to serve the Company's legitimate interests. This access will be conducted in accordance with applicable laws and Company policies for purposes such as safeguarding people and assets, organizing and monitoring work processes, maintaining and properly using Company property, ensuring employee compliance with safety standards and Company rules, retrieving Company files, etc.

If telework is terminated for any reason, the employee must return all files to the Company and must not retain any copies at their home.

In all cases, the Code of Ethics and Professional Conduct of the Hellenic Corporation of Assets and Participations (HCAP) applies, along with the associated penalties for non-compliance.

The employee will sign the Commitment attached to this policy.

Both the employee and the Company will comply with applicable laws, including those related to personal data protection.

If the conditions for participation in the telework program are not met, the Company reserves the right to deny or revoke telework approval.

4. Specific Obligations Regarding Personal Data Protection

The employee and the Company acknowledge and comply with applicable laws, including the framework for personal data protection, throughout the duration of the telework program.

The employee must adhere to the Company's policies on data and information security and take necessary measures, including but not limited to:

Placing equipment in a secure location without access by third parties.

Storing Company-related files exclusively on the Company's server.

Avoiding storage of files on online storage services.

Accessing only the files and systems strictly necessary for the tasks performed.

Locking the computer when not in use.

The use of electronic files is encouraged during telework. If the use of physical files is deemed necessary, the employee must ensure they are stored in a locked space after use, in accordance with the Company's Policy on the Processing and Protection of Personal Data and Use of Communication Tools.

Access to the Company's systems is permitted only via a virtual private network (VPN), ensuring data encryption and user authentication.

Use of Email and Messaging Applications

Personal email accounts (e.g., Gmail, Yahoo, Hotmail) must not be used for sending or receiving messages for telework purposes. Only the corporate email account should be utilized.

Messaging applications (text and/or video) should not be used for telework purposes when messages contain personal data that could pose risks if leaked. If their use is absolutely necessary, services with strong security features (e.g., encryption, data protection settings) should be preferred.

Use of Storage Device Terminals

Install and regularly update antivirus software and a firewall on the device (e.g., computer, laptop) used for telework.

Ensure the latest updates for application software and operating systems on employee devices are installed.

Use the most up-to-date versions of web browsers (e.g., Firefox, Chrome). Avoid storing browsing history (e.g., private browsing mode) or delete any telework-related links from the history at the end of the workday.

When using a corporate computer, do not save non-work-related files. If using a non-corporate computer with the Company's permission, separate work-related personal data files from personal files by organizing them into clearly distinct folders with appropriate descriptive names.

Apply suitable encryption to files containing personal data, especially when stored on portable/removable media (e.g., USB sticks). In some cases, encryption may also be applied to files on the primary telework device (computer, laptop), especially for high-risk data.

Back up files containing personal data processed during telework activities. Backup files should follow measures similar to those outlined in point 5.

Lock the device used for telework (e.g., screen saver with a password) if it is left unattended for any reason.

Conducting Teleconferences

Use platforms that support security features (e.g., encryption) for teleconferences. Avoid software that does not provide end-to-end encryption.

Protect the teleconference link (e.g., avoid sharing it publicly on social networks) for scheduled meetings.

Carefully review the terms of use and data protection policies when selecting a teleconference solution.

Voluntary Nature – Policy Modification/Revocation

The Company may include all or part of its staff in the telework program under the applicable framework.

The provision of telework is a voluntary option offered to the employee by the Company. The Company reserves the right to modify or revoke this policy unilaterally at any time and for any reason, including organizational needs or employee performance. Such modifications or revocation shall not be considered a unilateral adverse change to employment terms or grounds for any employee claims against the Company.