

Corporate Social Responsibility Policy

Regulatory Compliance | Business Ethics



ΕΝΕΡΓΕΙΑ & ΥΠΗΡΕΣΙΕΣ
ΚΟΙΝΗΣ ΩΦΕΛΕΙΑΣ



ΤΡΟΦΙΜΑ &
ΕΦΟΔΙΑΣΜΟΣ



ΔΙΑΧΕΙΡΙΣΗ ΑΚΙΝΗΤΩΝ



ΜΕΤΑΦΟΡΕΣ & ΥΠΟΔΟΜΕΣ



ΤΕΧΝΟΛΟΓΙΑ



ΤΑΧΥΔΡΟΜΙΚΕΣ
ΥΠΗΡΕΣΙΕΣ

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1. Purpose

The subsidiaries under the portfolio of the Hellenic Corporation of Assets and Participations S.A. (**Growthfund** or **the Company**) operate in sectors of the Greek economy such as energy, water supply and sanitation, infrastructure, transportation, services, markets, and others. These sectors critically influence key indicators of the Greek economy, including growth, employment, competitiveness, and outward orientation. In addition, they employ over 35,000 people, and their operations—as well as the services they provide—have a tangible impact on the daily lives of citizens. With data constantly evolving under the demanding conditions of society and the economy, public enterprises are called upon to operate efficiently while intensifying their efforts to ensure their sustainable development.

Corporate Social Responsibility (CSR) is a dynamic and multifaceted concept that constitutes a self-commitment for the Growthfund and its subsidiaries. With a steadfast focus on upgrading public enterprises and the economy, supporting society and employees, and protecting the environment, the Growthfund and its portfolio companies aim to serve as a dynamic example of Sustainable Development—both within the public sector in which they operate and across the broader economy and society.

Growthfund's commitment to responsible entrepreneurship and the achievement of Sustainable Development at all levels is guided by the Company's vision, mission, principles, and values.

- Public interest
- Integrity
- Transparency and Accountability
- Consultation
- Meritocracy
- Social Responsibility
- Innovation and Efficiency

In this context, Growthfund has established a CSR policy with clear objectives and priorities, adhering to international best practices and responding to the needs of the times.

2. Global Sustainable Development Goals

Growthfund has adopted the 17 Sustainable Development Goals for 2030. A key priority for Growthfund is to address, to the greatest extent possible, the objectives directly linked to the activities and challenges of the sectors in which its portfolio companies operate – objectives


that concern their employees, the society and environment in which they are active, as well as the material issues that may arise from their day-to-day operations.



3. Strategy

Due to the nature of the Growthfund’s activities, every CSR initiative must aim to generate a positive impact on the Greek economy, society, and the environment. To achieve this, Growthfund is pursuing a comprehensive Sustainable Development strategy based on four pillars.

Pillar	Priorities	Respective UN Sustainability Goals
Society and economy	<ul style="list-style-type: none"> ✓ Actions of high social value – solidarity and volunteering programmes ✓ Targeted actions (also through our subsidiaries and/or in cooperation with the state) to address crises that affect a large part of the population (such as the pandemic crisis) ✓ Sponsorships and donations ✓ Support and empowerment of communities ✓ Consultation with stakeholders Collaboration with public bodies and universities ✓ Responsible investments: investments based on criteria that promote Sustainable Development (Environmental – Social – Governance) ✓ Training-related activities at primary and secondary levels ✓ Youth training programmes 	
High standards of corporate	<ul style="list-style-type: none"> ✓ Promotion of a unified, modern corporate culture across all Growthfund's portfolio companies. 	

governance and compliance	<ul style="list-style-type: none"> ✓ Adoption and implementation of good corporate governance and compliance practices for transparency and accountability ✓ Center of Excellence with training tools, policies and seminars for the wider public sector ✓ Anti-corruption and bribery ✓ Responsible Suppliers: Establishment of a Supplier Code of Conduct, which will also include ESG criteria ✓ Crisis Management ✓ Employee awareness-raising regarding responsible management and business ethics 	
Modern working environment	<ul style="list-style-type: none"> ✓ Working conditions (health and safety) ✓ Gender equality ✓ Respect for diversity; establishment of an open, productive environment ✓ Meritocracy and equal opportunities ✓ Employee training tools/ shift to new production models, for the wider public sector ✓ Bridging the intergenerational technology skills gap through the promotion of modern work practices (e.g. remote working). 	
Climate change and low-emission economy	<ul style="list-style-type: none"> ✓ Encourage a balanced transition to a low-emission economy with an emphasis on major climate change initiatives (including de-lignitisation and overall reduction of fossil fuel energy consumption, especially when jobs and/or local communities are affected) ✓ Implement green solutions in everyday work and urban mobility ✓ Improve the energy footprint and encourage partners to act alike ✓ Promote infrastructure projects for sustainable cities and energy efficiency actions ✓ Environmental awareness-raising actions of employees and citizens ✓ Promote transition to lower-emission working models, such as through digital transformation actions 	

4. Management of CSR-related matters

CSR matters are managed at the Growthfund's highest executive level. Growthfund's Board of Directors and its Executive Management define both the short-term strategic priorities and the Company's long-term overarching Sustainable Development strategy.

Responsible business and ethics policies and procedures established by Growthfund play a critical and binding role in the implementation and management of CSR matters, ensuring full compliance with transparency requirements regarding the effective use of allocated resources. Each CSR-related initiative proceeds only after thorough review and, subsequently, a formal decision by the Board of Directors of the Growthfund, followed by relevant notification to the Corporate Governance Council.

The CSR policy is tailored to the activities and operational sectors of the Growthfund and its subsidiaries, and is adjusted in response to evolving needs at the economic, social, and environmental level.

Within this framework, an annual CSR plan with a defined budget must be prepared and submitted at the beginning of each year for approval by the Board of Directors. Given the nature of the public enterprises included in the Growthfund's portfolio and their impact on society and citizens, in cases of socioeconomic crisis or exceptional circumstances (e.g. pandemic, natural disasters), a deviation from the initial CSR plan may be foreseen, subject to a decision by the Board of Directors. Periodic CSR reports (e.g. annual) must also be submitted to the Board of Directors, documenting the relevant activities carried out during the reporting period as well as any improvement actions or proposals for approval by the Board.

The Regulatory Compliance Directorate, in collaboration with the Legal Department and the other Directorates of the Growthfund, provides support—where required—for Management's recommendations, as well as during the decision-making process of the Board of Directors on legal, regulatory, financial, social, and ethical matters that may arise.