

Sustainability Report 2021

elpedison
Next to you with all our energy

Sustainability Report 2021

Our ESG performance for long-term
value creation

Contents

6 **Message from the Chairman and CEO**

8 **Message from the Management Team**

10 **2021 at a glance**

A About ELPEDISON

1.1 14 Profile

1.2 16 Timeline

1.3 18 Our human resources

1.4 20 Our supply chain

1.5 23 Memberships and awards

B Sustainable Development

I 26 Our approach to Sustainable Development

II 26 Stakeholder engagement

III 28 Materiality analysis

B.1 Environment

1.1 36 Reducing GHG emissions

1.2 40 Safeguarding biodiversity

1.3 44 Providing solutions that reduce the environmental impact of our customers

B.2 Society

2.1 52 Generating and distributing direct and indirect economic value

2.2 56 Providing solutions that ensure access to affordable energy

2.3 59 Ensuring the health, safety and wellbeing of employees

2.4 68 Participating and investing in local communities

B.3 Corporate governance

3.1 76 Ensuring corporate governance, regulatory compliance and business ethics

3.2 84 Ensuring emergency preparedness

88 **About the Sustainability Report**

89 **GRI Content Index**

Message from the Chairman and CEO

[GRI 102-10, GRI 102-14]

Dear readers,

It is a great pleasure for all of us to present to you the first Sustainability Report of our company for the financial year 2021, through which we aim to provide comprehensive information on our long-term commitment to responsible and sustainable business operation and to an integrated approach for the management of our economic, social and environmental impacts.

For more than 15 years, ELPEDISON has held a leading position in power generation and in electricity and natural gas supply, operating on the basis of innovation, quality, investment in Greek entrepreneurship and sustainable development. Our long-term goal is to produce power and supply electricity and natural gas safely, contributing to the energy efficiency of the country, but also to offer our customers a high-quality experience, through our products and services.

In our company, our effort towards sustainable development is applied daily in all our business activities management, contributing at the same time to the achievement of the UN Sustainable Development Goals. The responsibility we have towards the environment, the local communities within which we operate daily and the society in general, our employees, partners and shareholders is part of our corporate culture and our philosophy. Serving the values that govern our corporate vision, we make investments and take initiatives that cover a wide range of energy

efficiency actions, including green energy, but also, best practices in the design of innovative services. In our company, we continuously endeavour to minimise the impacts that may occur to the environment, to reduce our carbon footprint and to improve the energy efficiency of our operations, turning the challenges into growth opportunities, always complying with the legal and institutional framework. With a dynamic presence in the natural gas market, in the context of environmental protection, we ensure an electricity production process fully environmentally friendly, with our two combined cycle gas turbine units in Thisvi, Boeotia and Thessaloniki.

We invest steadily in the flexibility of our units, either by upgrading existing ones or designing new units that will be able to run on natural gas and hydrogen. 2021, was a milestone for the technological development of our production activity, as we completed the upgrade of the Thessaloniki Power Plant, with an investment of more than €20 million, installing the most advanced technologies available for such type of units, enhancing the energy efficiency and increasing the ability of the plant to provide fast response to the network demand, a necessity which is an enabler for the further addition of non-programmable renewable generation in the national and European power systems.

At the same time, at ELPEDISON we believe that our most important investment and the most valuable capital are our employees. We seek to provide our people with a working environment of respect and trust. We invest in their ongoing professional development, recognize their efforts, reward results, and provide a fair, equal and enjoyable work environment. The health and safety of our people and partners are areas of fundamental value for us and we are committed to continuously improve our standards, while preserving our immaculate track record in terms of accidents at work. In this year we also had to remain consistent with extraordinary measures to minimise the impact of the COVID-19 pandemic and the company managed, for another year, to maintain uninterrupted business activity, while at the same time providing maximum protection to its personnel.

The high degree of competitiveness, the provision of innovative services, but also our responsible business activity, constitute the commitment of our company for a sustainable future. We are called upon to maintain the confidence of our stakeholders, constantly assessing potential business risks, in order to provide uninterrupted access to affordable energy. 2021 was another special year, in which we were asked to adapt

to the needs of the long-awaited Target Model for the electricity market in Greece, which will provide long-term benefits in terms of transparency, fairness, efficiency and competitiveness. In this framework, we have managed to increase our financial performance, despite the difficulties posed by the health crisis, proving our commitment to the needs of our customers.

Recognizing sustainable development as a powerful tool of our strategy and operations, we envision achieving long-term returns that will have a positive impact on society, the environment and the economy at large.

Enjoy your reading,
Sincerely yours,

Andrea Testi
Chairman of the Board of Directors

Nikolaos Zahariadis
CEO

Message from the Management Team

Marios Andrikopoulos

Legal Director

ELPEDISON's Legal Department operates under the principles of Lawyers' Code of Conduct and under this framework introduces precious principles within the corporate practice. In this sense the principles of ethics, transparency, integrity, lawful and compliant, as well as respectful conduct activity, govern our practice, towards the company's Sustainable Development.

Minimization of the GHG emissions and ensuring the H&S of our personnel, lies in the heart of what we do daily, in our Power Plants.

Antonios Argyrakis

Deputy Chief Operation Officer

Doing the right things for the communities we serve must guide our activities. Delivering exceptional service is what we should demand from ourselves when representing our customers.

Stathis Vovos

Commercial Director

At ELPEDISON, we always remain consistent towards our commitment to keep on creating value for the Greek economy, supporting incomes and employment with jobs, generating tax revenue to the State, thus, contributing to the creation of direct and indirect economic value.

Stamatis Kapralos

Finance & Control Director

Katerina Karali

Regulatory & Business Development Director

Investing in RES electricity projects, which will mitigate emissions of the company's generation portfolio, along with storage and hydrogen projects, are among the priorities of the BD department, ultimately enhancing sustainable ESG practices.

Business Ethics and regulatory compliance is a top priority for Energy Management Division in the ever-changing world of energy markets and all of us are working towards this goal.

Andreas Petropouleas

Energy Management Director

We consider one of our top priorities to provide and maintain a safe, healthy and modern workplace and working environment, where employees are engaged and enabled to perform at their best.

Spyros A. Raptakis

H.R., I.T. & Business Support Director

Assisting end-users to curtail energy costs, improve the quality of their energy usage and reduce CO₂ emissions, drive our energy efficiency solutions. Furthermore, sharing value with the communities we operate and the society in broad, lies at the core of our Strategy.

Maya Stylianou

Energy Efficiency Services, Corporate Communications & CSR Director

Silvio Jean

Chief Operation Officer

Respect for the workers and compliance with environmental and safety standards in our power plants is the key point of our culture. We constantly invest for improving safety and to lower the environmental impact, aiming to operate the most efficient power plants in Greece, with significant benefit for the environment and the population.

“In a changing world of energy, all of us at ELPEDISON envision meeting the challenges of the future, guided by the Sustainable Development principles”.



2021 at a glance

€561 m.

Investments
(2005-2021)



Launch of the
first corporate
campaign



People
Excellence
Award 2020

CRI Silver
Award and
Commendation in
the Environment
category from
the Corporate
Responsibility
Index

Corporate
Super Brands
Award
2021 - 2022

€1,493 m.

Directly
distributed
economic
value since 2021



Impacts on
protected areas
and areas of high
biodiversity value

€1,491 m.

revenues
in 2021



Environmental
incidents



Incidents of
working day
loss

2,524 MWh

Estimated energy
reduction with
the provision
of energy
efficiency services
since 2020

12.8%

Customer
increase
in electricity
supply



Negative effects
on biodiversity



Incidents of
corruption



Emergency
Drills



Supporting
the country's
hospitals
to combat
COVID-19
pandemic

€575 k.

Investments in
social contribution
programs, with
a focus on
society and the
environment, during
2019-2021



Business risk
assessment
system



New Social
Investment
Program
"Ενεργοποιώ"

During 2021 ELPEDISON completed the upgrade of the Thessaloniki power plant, with an investment of more than €20 million.

A

About ELPEDISON

1.1

Profile

14

1.2

Timeline

16

1.3

Our human
resources

18

1.4

Our supply
chain

20

1.5

Memberships
and awards

23

1.1 Profile

[GRI 102-1, GRI 102-2, GRI 102-3, GRI 102-4, GRI 102-5, GRI 102-6, GRI 102-16]

The ELPEDISON Company

ELPEDISON is the result of the cooperation between two "giants" in the energy sector, the Hellenic Petroleum Group and Edison. Combining their power and know-how, Hellenic Petroleum, one of the largest industrial and commercial Energy groups in South-Eastern Europe, and Edison, the longest-running electricity company in Europe, one of the largest in Italy and member of Électricité de France Group, world's largest power company, created ELPEDISON.

We are a leading independent producer of electricity in Greece and one of the largest and most reliable suppliers of electricity and natural gas, holding a leading position in the Greek energy market.

The company is a key player in the energy market

Having inherited the experience, know-how and technology from the parent companies, Hellenic Petroleum and Edison, we are an energy company that understands the market in depth, identifying all the critical factors that affect us and always aiming for the benefit of the final consumer.

With our two privately owned combined cycle power plants, with a total installed capacity of 820 MW running on natural gas fuel, we are committed to one of the most environmentally friendly power generation processes. At the same time, the advanced combined cycle production technology, used in both of our units, ensures the most efficient use of fuels, achieving and exceeding an efficiency of 56%.

Thanks to our well-trained staff, we accurately identify the needs of our business and residential customers. We offer our customers the product that best suits their needs while, at the same time, reducing their costs for electricity and natural gas consumption. In addition, we offer high quality energy services throughout our clientele, as well as the ability to provide fully personalized company solutions that respond to their different needs, resulting in the additional reduction of their energy costs and significant reduction of their environmental footprint.

Today, ELPEDISON is a leading energy company, both in production and supply of electricity and in the supply of natural gas. We aspire to always be one of the most important players in the industry, offering high quality energy products and services, at competitive prices, with stability and consistency.



During the period 2005-2021, our investments amounted to a total of €561 m., from our own funds, without additional funding from the State.

Our vision

Be the leader in providing outstanding and innovative energy solutions.

Our mission

We are committed to produce and sell power safely, contributing to the security of supply and sustainable development. We provide our customers with a top quality experience through our products

and services. We operate with enthusiasm in what we do and we pride ourselves at offering our employees a place where they can excel, creating value for all our stakeholders.

Our values



Safety



Commitment



Customer focus



Integrity



Excellence

Our culture

A high-performing, customer-focused, innovative and collaborative culture, that encourages open dialogue, individual autonomy, initiative and calculated risks, together with continuous learning and

development, so as to capitalize on business opportunities, drive business growth and ensure the successful implementation of our long-term strategy.

1.2 Timeline

2003



Hellenic Petroleum Group establishes the company ENERGEIAKI THESSALONIKIS S.A. (ENTHES).
ILEKTROPARAGOGI THISVIS S.A. was established.

2005



ENTHES is completing the construction of the first Natural Gas-fired power plant in Thessaloniki, with a total installed capacity of 400 MW

2006



The operation of the Power Plant in Thessaloniki begins
EDISON participates in ILEKTROPARAGOGI THISVIS S.A.

2007



The construction of the 2nd Power Plant in Thisvi, Viotia, with a total installed capacity of 420 MW, begins by ILEKTROPARAGOGI THISVIS SA, a company that is a joint venture of EDISON- ELLAKTOR-HALCOR

2009



ENTHES absorbs ELECTRICITY Thisvi SA and is renamed to ELPEDISON ELECTRICITY PRODUCTION S.A., with the international distinctive title ELPEDISON Power S.A.. The shareholders of the company are HELLENIC PETROLEUM, EDISON, ELLAKTOR & HALCOR. ELPEDISON BV - which is a joint venture of HELLENIC PETROLEUM 50% & EDISON 50% - controls 75.78%



HELLENIC PETROLEUM & EDISON launch ELPEDISON COMMERCIAL, which commences its activity in the electricity supply and trading market, with the international distinctive title ELPEDISON Trading

2010



The 2nd ELPEDISON Power plant in Thisvi is completed and its commercial operation begins

2012



ELPEDISON Trading is renamed to ELPEDISON Energy

2015



ELPEDISON Power absorbs ELPEDISON Energy and the company's title changes to ELPEDISON, thereby establishing a vertically integrated power generation and supply company

2016



ELPEDISON becomes the No. 1 alternative supplier, with 50,000+ customers

2017



ELPEDISON enters the natural gas supply market

2018



ELPEDISON reached a total number of 100,000 customers

2019



ELLAKTOR and HALCOR exit the joint venture and ELPEDISON BV acquires 100% of ELPEDISON's shares



The Company starts importing LNG

2020



Proceeding to investment of € 20 m. for the upgrade of the Thessaloniki power plant with more environmentally friendly features



The Company enters the Target Model



The Company creates a new business unit for Energy Efficiency Services



ELPEDISON reached a total number of 250,000 customers

2021



The investment for the upgrade of the Thessaloniki power plant was completed

1.3 Our human resources

[GRI 102-7, GRI 102-8]



We offer a range of professional development opportunities, in a fast, dynamic environment. We adopt a high-performance, customer-centric, innovative and collaborative culture, which encourages open dialogue with our people, autonomy, initiative

and sensible risk, along with continuous improvement and growth, to seize every business opportunity, to lead the development of the Company and ensure the successful implementation of our long-term strategy.



We value excellence, zeal for work, integrity, customer orientation and safety awareness and look for the same characteristics in people, who are interested in working for us.

Employee training

At ELPEDISON we have created a personal and professional development program that aims to provide targeted development solutions that continuously improve the professional knowledge and skills of our employees, in order to excel in a dynamic environment and add value to the company.

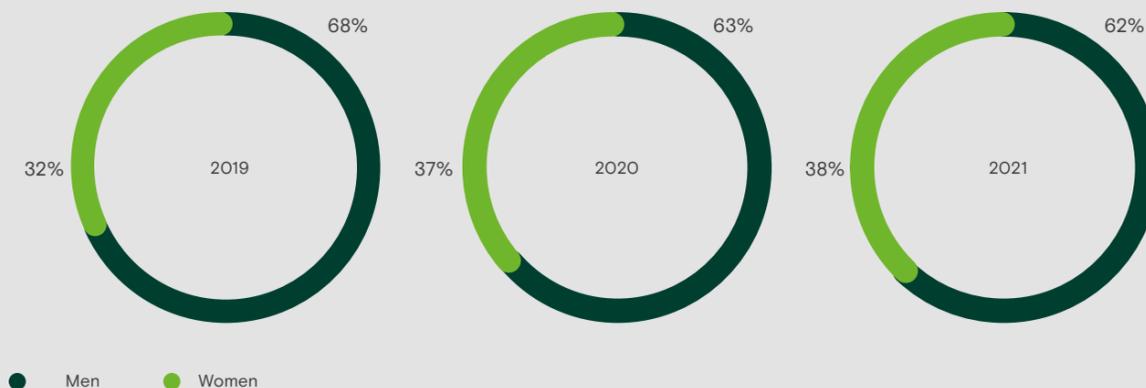
More specifically, the program aims at:

- Supporting the smooth integration of new employees into the corporate culture and the way the company operates
- Creating a common language and culture among employees that is in line with the company's expectations
- Enhancing the necessary skills of employees, so as to achieve excellent performance in their work and to develop as professionals
- Strengthening managerial skills and ensuring business continuity
- Increasing employee engagement
- Creating a competitive advantage for the company through employees' specialization

In addition, during 2021, more than 4,000 hours of training were held on, among others, at the following topics:

- Energy, legislative framework and strategy
- Energy management
- Project management
- Health and safety at work
- Personal data protection
- Performance management
- Energy markets
- Positive psychology
- Management skills development
- IT and cyber security applications
- Data analysis and reporting
- Technical training on the operation and maintenance of units
- Use of the LinkedIn learning platform to carry out a wide range of trainings for the development of personal skills (soft skills)

Total number of employees by employment contract (permanent) and gender



	2019			2020			2021		
Number of employees ELPEDISON	158			205			226		
Total number of employees by employment contract and gender									
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent	108	50	158	130	75	205	140	86	226
Temporary	0	0	0	0	0	0	0	0	0
Total	108	50	158	130	75	205	140	86	226
Total number of employees by employment contract and region									
Athens									
Permanent	91			136			156		
Temporary	0			0			0		
Thessaloniki									
Permanent	38			40			44		
Temporary	0			0			0		
Thisvi									
Permanent	29			29			26		
Temporary	0			0			0		
Total	158			205			226		
Total number of employees by employment type									
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	108	50	158	130	75	205	140	86	226
Part-time	0	0	0	0	0	0	0	0	0
Total	108	50	158	130	75	205	140	86	226

Note: Part of our business activity is assigned to third companies.



Employee benefits

We offer to all employees' extra benefits, in addition to those provided in the current legal framework, which are divided into health benefits, cash benefits or other benefits:

- Health insurance program
- Additional medical coverage
- Pension plan
- Company vehicles
- Corporate mobile phones
- Monthly ticket restaurant vouchers and employee mobility benefits
- Special pricing on ELPEDISON services and products
- Coverage of vehicle travel expenses for employees
- Coverage of employees commuting expenses via means of public transportation

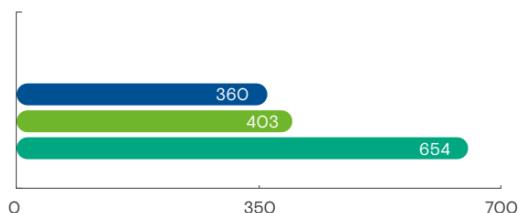
1.4 Our supply chain

[GRI 102-9, GRI 102-10]

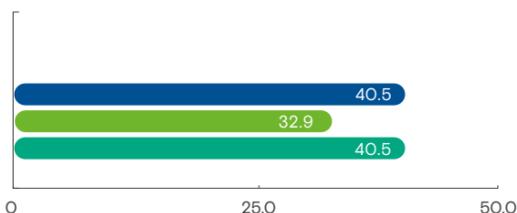
At ELPEDISON we work with reliable suppliers around the world, with whom we maintain long-term relationships of trust, as they contribute to a crucial role in our value chain. The main categories of suppliers include:

- Suppliers of industrial materials
- Commercial entities
- Professional equipment suppliers
- Suppliers of IT systems and equipment
- Business consultants
- Technical services

Number of suppliers



Estimated monetary value of total payments to suppliers (mil. €)



● 2019 ● 2020 ● 2021

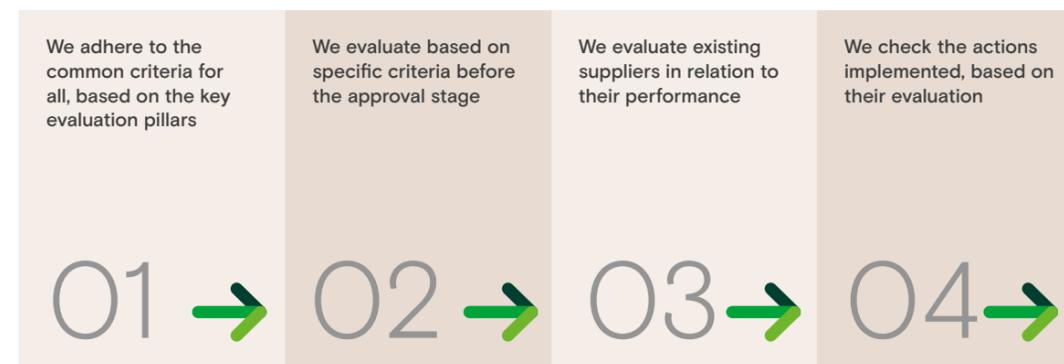
Selection and evaluation of suppliers

From the first day of ELPEDISON's operation, we select suppliers who respect the environment, health & safety and ethics and take measures to protect them. As a producer and supplier of energy with a significant impact on the environment, we believe that proper and responsible cooperation must be based on criteria that create value in both the environment and the society as a whole. Specifically, we believe that every ELPEDISON supplier in Greece and abroad, must embrace the company's position in legal, ethical and social issues, which affect the way our company operates and the rules that govern our operation and action. We value the contribution of our suppliers and believe that trust is gained through transparency and honesty.

For this reason, we rely on our suppliers and select those who operate in the same way as us, always in accordance with our Code of Conduct and Business Ethics.

In 2020, we recognized the need to improve the management of relationships with our suppliers, by appointing in our organization chart, a Vendor Management & Strategic Sourcing Section Manager, who undertakes the observance of the operating rules of our company, regarding the selection and retention of suppliers. In this context, in 2021 we drafted and implemented a detailed procedure which indicated all criteria for evaluating and selecting new suppliers, as well as evaluating existing ones. For the coordination and implementation of what is stated in this document, the procurement department is responsible in cooperation with the company's operational departments.

To select and maintain in the "list" the approved suppliers:



The criteria for selecting suppliers consist of the following pillars:

- Strategic direction
- Reaching customers
- Cost / Financial context
- Ability to respond
- Competitiveness
- Sustainable development
- Communication
- Control and consistency
- Commitment
- Alignment with ELPEDISON's values

Supply chain	2019	2020	2021
Number of suppliers per city			
Athens	239	276	441
Alexandroupoli	1	1	1
Volos	—	—	1
Elefsina	5	6	7
Thessaloniki	80	84	145
Thiva	8	8	15
Kilkis	1	1	2
Kozani	2	2	4
Komitini	1	1	1
Corinth	1	1	1
Crete	2	2	2
Lamia	—	—	1
Larisa	—	—	1
Livadeia	11	11	18
Patra	2	2	3
Ptolemaida	2	2	2
Serres	1	1	2
Sparti	—	—	1
Tripoli	1	1	1
Florina	1	1	1
Chalkida	2	3	4
Total	360	403	654
Estimated monetary value of total payments to suppliers (€)			
Athens	38,127,440	29,538,046	37,638,280
Alexandroupoli	1,440	1,440	1,440
Volos	—	—	5,339
Elefsina	114,328	96,819	107,525
Thessaloniki	936,813	1,589,211	1,541,576
Thiva	46,718	41,343	184,565
Kilkis	690	880	0
Kozani	203,830	179,056	74,163
Komitini	545	77	3,960
Corinth	165	8,376	2,351
Crete	96,086	170,515	293,560
Lamia	—	—	29,880
Larisa	—	—	10,839
Livadeia	131,723	108,362	194,483
Patra	489,981	135,273	38,816
Ptolemaida	340,968	415,844	326,150
Serres	10,841	5,281	5,223
Sparti	—	—	3,166
Tripoli	1,643	1,852	0
Florina	2,787	14,869	7,374
Chalkida	10,690	633,515	79,570
Total	40,516,688	32,940,759	40,548,261
Basic categories of suppliers			
Suppliers of industrial materials	73	57	85
Commercial entities	107	146	278
Professional equipment suppliers	13	16	31
Suppliers of IT systems and equipment	17	21	27
Business consultants	40	56	66
Technical services	110	107	167
Total	360	403	654

1.5 Memberships and awards

[GRI 102-12, GRI 102-13]



At ELPEDISON we participate in a variety of bodies and organizations in the context of strengthening and expanding the network of collaborations, exchange of know-how and expertise in the field of energy, as well as the

promotion of business responsibility. We strive for excellence in our business, offering our customers high quality experience through our products and services. Our continued effort is recognized and rewarded with corporate distinctions and awards.

Our collaborations in 2020/2021 were the following:

- Children's hospitals: Athens Children's Hospital Aghia Sophia, Athens General Children's Hospital P. & Ag. Kyriakou and Pentelis Children Hospital, as well as three hospitals in Thessaloniki, GNTH Ippokratio Hospital, AHEPA and Papageorgiou
- We4All
- The Smile of the Child
- Syzoi
- Municipality of Thiva
- Holy Metropolis of Naples and Stavroupolis
- BEST (Board of European Students of Technology)
- IENE
- Alliance for Greece
- Hellenic-Italian Chamber (Member of the Chamber)
- Rewarding Packaging Recycling Agency for the sponsorship of the hellenic recycling competition
- Organization BEST (Board of European Students of Technology) for the sponsorship of the Hellenic competition EBEC Greece
- University of Macedonia for the sponsorship of the
- TEDxUniveresityofMacedonia 2021
- Hellenic Society for the Protection and Rehabilitation of Persons with Disabilities (ELEPAP)
- Institute of Social & Preventative Medicine (ISPM)

For 2020/2021 our awards were the following:

- CRI Silver Award and Commendation in the Environment category from the Corporate Responsibility Index
- People Excellence Award 2020 in the Energy sector, as one of the companies that upgrade the "Employee Experience", providing personalized human resources services
- Corporate Superbrands Greece Award 2021-2022



We strive for excellence in our business, offering our customers a high-quality experience, through our products and services.

B

Sustainable Development

I

Our approach to
Sustainable Development

26

II

Stakeholder
engagement

26

III

Materiality
analysis

28



I Our approach to Sustainable Development

[GRI 102-40, GRI 102-42, GRI 102-43, GRI 102-44]

The responsibility we have towards the environment, the local communities where we live and operate daily, towards other stakeholders such as our employees, customers, shareholders and suppliers/partners as well as the society in general, is embedded within our corporate culture and philosophy.

For ELPEDISON, our contribution to Sustainable Development is more than just charitable contributions and sponsorships. It is something that applies to the every-day management of our business activities.

According to Sustainable Development theories, companies are the players who, more than all of the others, have the power, working in cooperation with society and civil

society organizations, to improve the quality of development, since their activities affect a large number of stakeholders.

The ability to manage relations with stakeholders, beyond the requirements of laws and regulations, consistently towards Sustainable Development, is material for the continuity and success of any business endeavor.

Sustainable Development is a strategic factor of ELPEDISON's business model and is translated into different priorities, as defined by the materiality analysis carried out by the company and presented in this Report.

II Stakeholder engagement

At ELPEDISON, we recognize the categories of our stakeholders that impact and / or influence our business operation and on an annual basis we validate and prioritize them, while at the same time we monitor and improve the methods of communication and consultation with them. In addition, we record the basic needs and

expectations of stakeholders, as they arise from our daily business operations, through the existing channels of communication and engagement with them (e.g. surveys, telephone or electronic communication, meetings, conferences, announcements, etc.).

Key stakeholder groups	Method of communication and engagement	Frequency of communication	Key topics of interest
Employees	Electronic, telephone, in-person	Daily	<ul style="list-style-type: none"> Ensuring the health, safety and well-being of employees Safeguarding corporate governance, regulatory compliance and business ethics Generating and distributing direct and indirect economic value
Customers	Electronic, telephone in-person, in-writing	Daily	<ul style="list-style-type: none"> Ensuring emergency preparedness Providing solutions that ensure access to affordable energy Providing solutions that reduce the environmental impact of our customers
Consumers	Electronic, telephone, in-person	Daily	<ul style="list-style-type: none"> Providing solutions that ensure access to affordable energy Ensuring the health, safety and well-being of employees Reducing GHG emissions Ensuring emergency preparedness
Shareholders	Electronic, telephone, in-person	Daily	<ul style="list-style-type: none"> Ensuring the health, safety and well-being of employees Providing solutions that ensure access to affordable energy Providing solutions that reduce the environmental impact of our customers Reducing GHG emissions
Suppliers/Partners	Electronic, telephone, in-person	Daily	<ul style="list-style-type: none"> Ensuring the health, safety and well-being of employees Safeguarding corporate governance, regulatory compliance and business ethics Generating and distributing direct and indirect economic value
State and Supervisory Authorities	Electronic, telephone, in-person	Occasionally	<ul style="list-style-type: none"> Providing solutions that ensure access to affordable energy Ensuring emergency preparedness Safeguarding corporate governance, regulatory compliance and business ethics
Academic community	Electronic, telephone, in-person	Occasionally	<ul style="list-style-type: none"> Reducing GHG emissions Ensuring the health, safety and well-being of employees
Business community	Electronic, telephone, in-person	Occasionally	<ul style="list-style-type: none"> Reducing GHG emissions Generating and distributing direct and indirect economic value Safeguarding biodiversity
Local Government/ local community	Events, telephone, in-person	Occasionally	<ul style="list-style-type: none"> Reducing GHG emissions Safeguarding biodiversity Generating and distributing direct and indirect economic value Providing solutions that ensure access to affordable energy
Wider society	Electronic, telephone, in-person, in-writing	Occasionally	<ul style="list-style-type: none"> Safeguarding biodiversity Reducing GHG emissions Providing solutions that ensure access to affordable energy Providing solutions that reduce the environmental impact of our customers Ensuring the health, safety and well-being of employees Ensuring emergency preparedness

III Materiality analysis

[GRI 103-1, GRI 102-46, GRI 102-47]

At ELPEDISON we focus on topics related to our economic growth and the creation of long-term value for all our stakeholders. In this context, we identified the economic, social and environmental aspects of our activities related to the needs and expectations of stakeholders, but also the

broader impacts we create on the economy, society and the natural environment.

In 2021, we conducted for the first time a materiality analysis based on the principles of the international GRI standards.

Phase 1 – Identification of Sustainable Development topics

In the first phase of the analysis, we took into account the GRI Standards Stakeholder Inclusiveness principle and the GRI Sustainability Context and identified issues related to the economic, social and environmental impacts of our business model, as well as the needs and expectations of our stakeholders, which emerged, inter alia, from the following sources:

- Business strategy, policies, processes, product / service impact analysis, etc.
- Results of existing engagement / communication with stakeholders.
- Peer companies Sustainability Reports.
- UN Sustainable Development Goals (UN SDGs)
- GRI Standards and other ESG standards topics for the energy sector.
- ESG requirements of investors, analysts and rating agencies.

The topics identified and arising from the above work, are the following:

1. Reducing GHG emissions
2. Safeguarding biodiversity
3. Promoting of circular economy practices
4. Improving water management
5. Generating and distributing direct and indirect economic value
6. Providing solutions that ensure access to affordable energy
7. Providing solutions that reduce the environmental impact of our customers
8. Creating and retaining employment
9. Ensuring the health, safety and well-being of employees
10. Investing in the training and development of employees
11. Supporting diversity, inclusion and protection of human rights at work
12. Participating and investing in local communities
13. Ensuring corporate governance, regulatory compliance and business ethics
14. Ensuring emergency preparedness
15. Evaluating of partners (including suppliers/ contractors) with ESG criteria

2021

3

we conducted for the first time a materiality analysis based on the principles of the international GRI standards

The materiality analysis was performed through a 3-phase framework



Phase 2 – Prioritization of material topics

In the second phase of the analysis, we took into account the GRI Standards Principles of Materiality and Stakeholder Inclusiveness. Having already identified at company level 15 topics related to our activities through which we create economic, social and environmental impacts throughout our value chain, we proceeded with an electronic survey completed by our stakeholders, in order to prioritize these topics, asking them to assess the extent to which these topics:

- a. Significantly influence their assessments and decisions as company’s stakeholders
- b. Reflect the significant economic, environmental and social impacts of ELPEDISON (impacts at a broader economic, social and environmental level, in addition to the impact on stakeholders)

The analysis of the survey results led to the following topics prioritization as shown in the materiality map:

Material topics

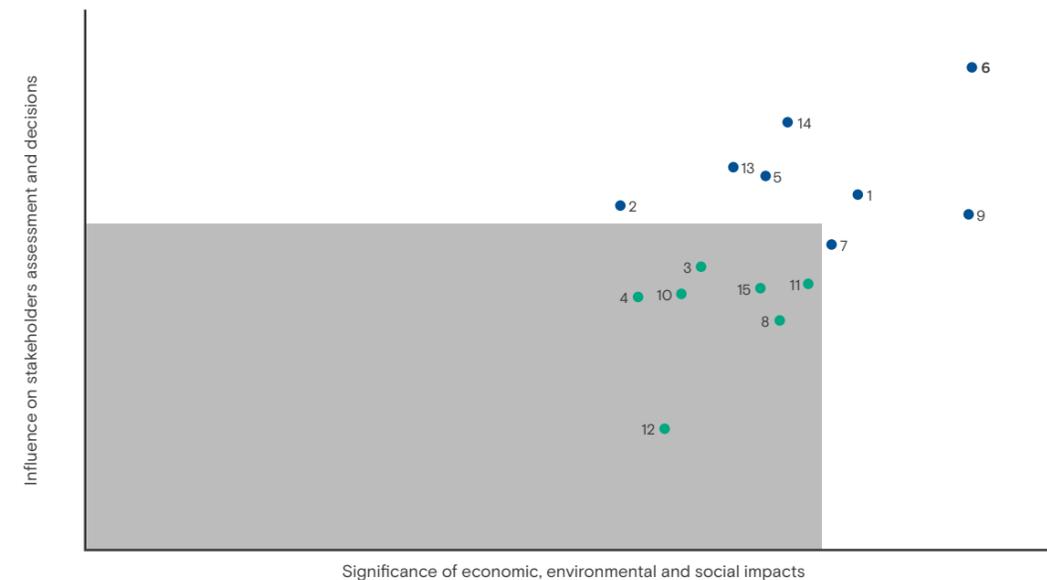
- 1. Reducing GHG emissions
- 2.Safeguarding biodiversity
- 7. Providing solutions that reduce the environmental impact of our customers
- 5. Generating and distributing direct and indirect economic value
- 6. Providing solutions that ensure access to affordable energy
- 9. Ensuring the health, safety and well-being of employees
- 13. Ensuring corporate governance, regulatory compliance and business ethics
- 14. Ensuring emergency preparedness

Other identified topics

- 3. Promoting circular economy practices
- 4. Improving water management
- 8. Creating and retaining employment
- 10. Investing in the training and development of employees
- 11.Supporting diversity, inclusion and protection of human rights at work
- 12. Participating and investing in local communities*
- 15. Evaluating partners (including suppliers/ contractors) with ESG criteria

*This topic has not been identified as material through the materiality analysis and the electronic survey completed by our stakeholders. However, the topic Participating and investing in local communities is included and analyzed in this Report as an identified topic, since ELPEDISON implements important social actions, creating direct and indirect value in the communities the company operates in.

Materiality map



Materiality and boundaries

The information captured in the table below, based on the GRI Standards requirements, presents:

1. Why is each topic material?
 - a. Which are the stakeholders affected by the most significant environmental and socio-economic impacts created by ELPEDISON (based on the results of the sustainable development materiality analysis survey).
 - b. What are the UN Sustainable Development Goals to which ELPEDISON contributes from the environmental and socio-economic impacts it creates in its stakeholders but also in the economy, society and the natural environment.
2. Who causes these impacts?

The event of each impact may occur at different stages of the ELPEDISON value chain. Consequently, some are caused directly by ELPEDISON and some indirectly by a third party, whose activities are linked to ELPEDISON (downstream or upstream of its value chain).

Phase 3 – Validation of results

In the last phase of the analysis, the results of the second phase were validated by the ELPEDISON’s Top Management. This process took into account the GRI Standards Principle of Completeness and Stakeholder Inclusiveness.

Through this analysis, the 8 material topics, which are presented in this Report, were prioritized.

Material topic boundaries

Material topic	Why is the topic material? Who is affected by the impacts?		Boundaries Who causes the impacts?		Report section
	Wider economic, social and / or environmental impacts caused	Stakeholder groups affected	ELPEDISON involvement with the impacts	Stakeholders outside of ELPEDISON that may cause or be associated with the material topic impacts	
Reducing GHG emissions	 	<ul style="list-style-type: none"> Employees Customers Consumers Shareholders Suppliers/Partners Local Government/Local community Wider society 	✓	<ul style="list-style-type: none"> Customers Consumers Suppliers/Partners State and Supervisory Authorities 	ENVIRONMENT Chapter 1.1
Safeguarding biodiversity	 	<ul style="list-style-type: none"> Employees Customers Consumers Shareholders Suppliers/Partners Local Government/Local community 	✓	<ul style="list-style-type: none"> Suppliers/Partners State and Supervisory Authorities Local Government/Local community 	ENVIRONMENT Chapter 1.2
Providing solutions that reduce the environmental impact of our customers	 	<ul style="list-style-type: none"> Employees Customers Consumers Wider society 	✓	<ul style="list-style-type: none"> Academic community Suppliers/Partners State and Supervisory Authorities 	ENVIRONMENT Chapter 1.3
Generating and distributing direct and indirect economic value		<ul style="list-style-type: none"> Employees Shareholders Suppliers/Partners Local Government/Local community Wider society 	✓	<ul style="list-style-type: none"> Customers Consumers Suppliers/Partners State and Supervisory Authorities 	SOCIETY Chapter 2.1
Providing solutions that ensure access to affordable energy	 	<ul style="list-style-type: none"> Employees Customers Consumers Wider community 	✓	<ul style="list-style-type: none"> State and Supervisory Authorities 	SOCIETY Chapter 2.2
Ensuring the health, safety and well-being of employees	 	<ul style="list-style-type: none"> Employees Customers Suppliers/Partners 	✓	<ul style="list-style-type: none"> Suppliers/Partners 	SOCIETY Chapter 2.3
Safeguarding corporate governance, regulatory compliance and business ethics	  	<ul style="list-style-type: none"> Employees Shareholders Customers Consumers Suppliers/Partners Business community 	✓	<ul style="list-style-type: none"> Customers State and Supervisory Authorities Local Government/Local community 	CORPORATE GOVERNANCE Chapter 3.1
Ensuring emergency preparedness	 	<ul style="list-style-type: none"> Employees Shareholders Customers Suppliers/Partners 	✓	<ul style="list-style-type: none"> Suppliers/Partners State and Supervisory Authorities Local Government/Local community 	CORPORATE GOVERNANCE Chapter 3.2
Important identified topic					
Participating and investing in local communities	    	<ul style="list-style-type: none"> State and Supervisory Authorities Suppliers/Partners Local Government/ local community Wider society 	✓	<ul style="list-style-type: none"> State and Supervisory Authorities Local Government/ local community Wider society 	SOCIETY Chapter 2.4

B.1

Environment

1.1

Reducing
GHG emissions

36

1.2

Safeguarding
biodiversity

40

1.3

Providing solutions that reduce
the environmental impact
of our customers

44



1.1 Reducing GHG emissions



[GRI 103-2, GRI 102-11]



Our approach

ELPEDISON follows, in all its activities, rules and requirements related to the respect and protection of the environment. Adheres to the regulatory framework in power plants and offices, takes into account scientific developments, evaluates and monitors, on an ongoing basis, the available data and implements, as far as possible, the most appropriate preventative and corrective actions.

At ELPEDISON all our corporate, commercial and industrial activities are in line with the principles of "green growth", seeking a sustainable tomorrow, in a better, energy-independent environment.

Moreover, we intend to address the issue of climate change with determination. We share the vision presented in the European Union's 2020 Program - "Energy 2020": A Strategy for Competitive, Sustainable and Secure Energy - regarding a strategy based on new synergies between the social, economic and industrial institutions, for the achievement of a more sustainable development. In addition, we are adapting our strategy under the European Green Deal, to commit to the reduction of emissions by at least 55% by 2030.

Our Policy

For ELPEDISON, value creation is based on the ability to achieve financial objectives while gradually reducing environmental impacts, following a sustainable growth model. In this way, all stakeholders can have their expectations met.

The implementation of a sustainable and responsible environmental policy is a basic principle of our company philosophy, but also our obligation to the societies where we operate. The environmental protection policy, which is included and analyzed in the ELPEDISON Management Framework document, is implemented through respect for the needs and expectations of stakeholders throughout the value chain, based on a precautionary approach.

In this context, the promotion of a sustainable development model is implemented throughout the company through:

- Compliance with environmental legislation, relevant to our activities, for each production unit.
- Self-assessment, at regular intervals, to verify the correct application of the established procedures, regarding the management of energy and pollutants.
- Enhancing the development and dissemination of environmentally friendly technologies with the possibility of integrating more environmentally friendly methods and tools into energy production.

Recording and monitoring of greenhouse gas emissions



Our priority at ELPEDISON is to ensure the proper management and continuous improvement of our environmental footprint resulting from our business activities. In line with international transparency best practices in emissions reporting, we monitor our impact on climate change and monitor annual carbon dioxide emissions. We follow international protocols for the calculation of our emissions.

In addition, in compliance with the provisions of the EU Directive and the existing national institutional framework, we have been registered in the greenhouse gas emission allowance trading system and have developed and operate a dedicated carbon trading platform for trading in accordance with international standards. In all

our power plants, we have obtained the required carbon dioxide emission allowances and at the same time, we implement the recording and monitoring of emissions and relevant report submissions.



At ELPEDISON all our corporate, commercial and industrial activities are in line with the principles of "green growth", seeking a sustainable tomorrow, in a better, energy-independent environment.

Improving energy efficiency



Energy consumption and air emissions are key environmental impacts of our power generation process. Our approach to improving our energy efficiency and consequently reducing air emissions is based on the following pillars:



A. Investments in high-tech equipment to improve energy efficiency

In 2021, the investment of €20 m. was implemented for the upgrade of the Thessaloniki power plant with more environmentally friendly features, aiming to improve the power generation process and energy efficiency. In this unit, we achieve high energy efficiency by consuming primary energy for the production of electricity, through the combustion of raw materials. The “smart” energy management system used by the unit prevents the increase of the temperature and minimizes the emission of polluting emissions (NOx, CO₂ emissions).



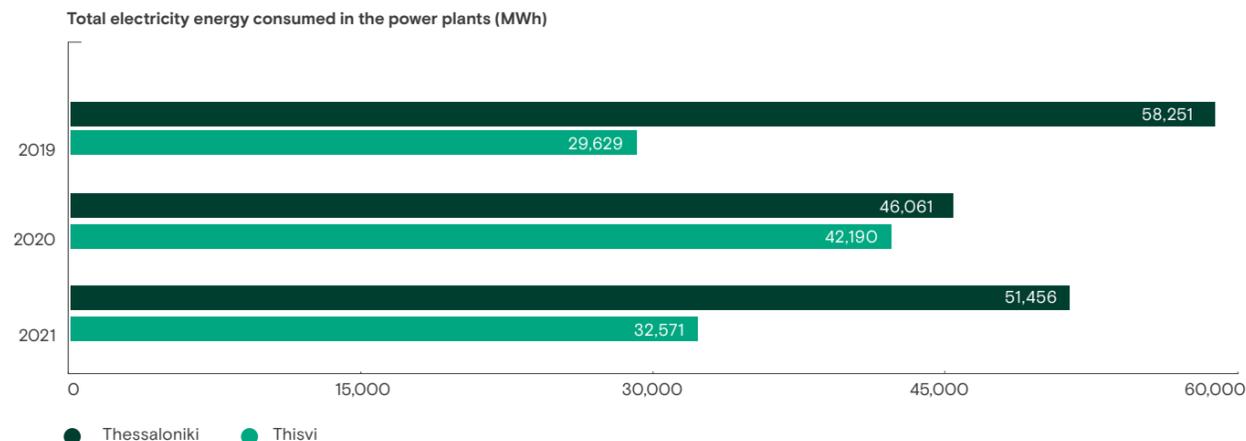
Smart energy management control systems

B. Energy saving actions

In the context of improving the energy efficiency of our offices in Athens, we have invested in a number of management and consumption reduction actions, such as the use of LED technology lamps and replacement of VRV technology air conditioning systems, with “smart” energy management control systems. In addition, we have replaced conventional lighting with LED equivalents in the warehouse of Thisvi unit.

Our performance

[GRI 103-3, GRI 302-1, GRI 305-1]



		2019	2020	2021
Total energy consumed - Thessaloniki Unit				
Electricity	MWh	58,251	46,061	51,456
Fuels from non-renewable resources				
Natural gas (HHV)	MWh	3,766,345	2,796,428	4,098,090
Natural gas (pre-heating)	m ³	139,901	116,415	125,064
Diesel	lt	2,291	3,095	3,000
Total energy consumed - Thisvi Unit				
Electricity	MWh	29,629	42,190	32,571
Fuels from non-renewable resources				
Natural gas (HHV)	MWh	2,715,259	4,395,190	3,989,476
Natural gas (pre-heating)	m ³	74,944	61,847	101,476
Diesel	lt	21,750	31,000	30,000
Total energy consumed - Headquarters				
Electricity	MWh	325	285	411

	2019	2020	2021
Total greenhouse gas (tCO₂) emissions - Thessaloniki Unit			
Direct emissions (Scope 1)			
Natural Gas and Oil	676,735	498,716	735,009
Total greenhouse gas (tCO₂) emissions - Thisvi Unit			
Direct emissions (Scope 1)			
Natural Gas and Oil	453,606	741,242	668,409

1.2 Safeguarding biodiversity



[GRI 103-2, GRI 102-11]



Our approach

At ELPEDISON we take consistent care to ensure biodiversity. We recognize how electricity production can affect and depend on biodiversity

and the ecosystem. That is why we systematically try to create a positive effect on the environment.

Our commitment to the environment

Our company, in accordance with the Policy it implements, is committed to the protection of the environment, preventing any conditions and events that may result in causing pollution or damage to the environment, as well as managing environmental resources prudently and responsibly.

In this context, we implement an Environmental Resource Management System in accordance with the EN ISO 14001: 2015 standard, which includes the proper documented procedures and work instructions for our facilities.

In addition, we implement control measures and procedures to measure and reduce the impact of our work on the environment, preventing and minimizing the corresponding risks, as well as addressing all factors and conditions that may result in environmental pollution or other events.

The main purpose is to provide a framework for the implementation of impact assessment

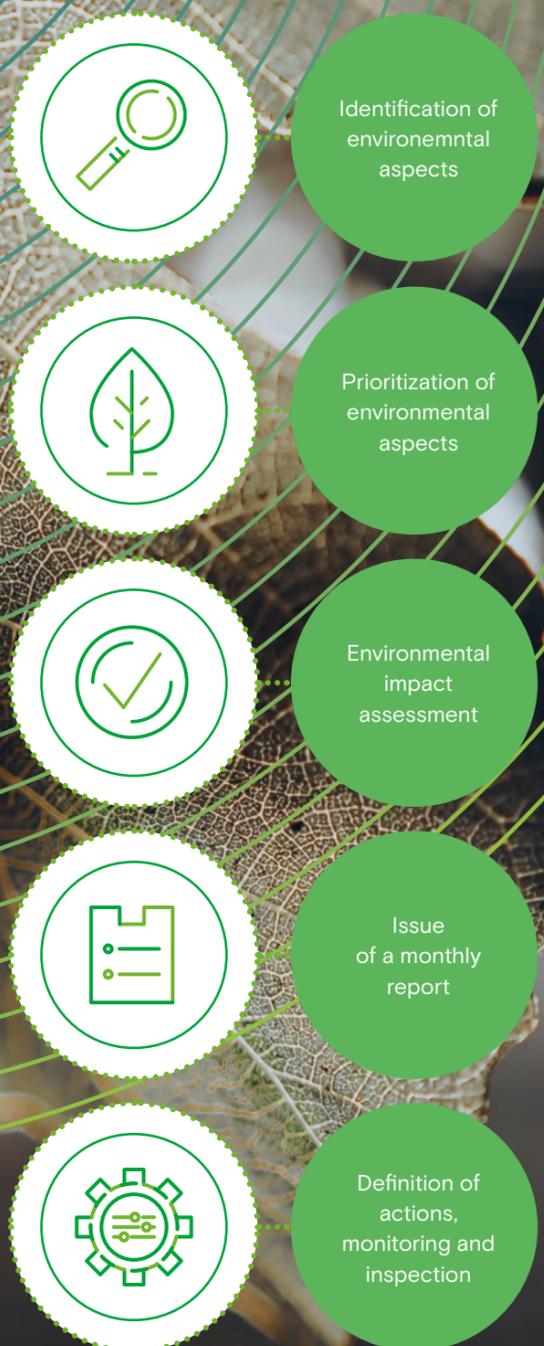
measures, in order to avoid, mitigate or compensate for adverse environmental impacts, as well as to minimize and manage potential risks to the environment and biodiversity.

The most important risks that are identified and evaluated are the following:

- Chemical spills
- Other hazardous liquid leaks
- Fire at the natural gas station
- Fire in oil tanks

At the same time, in the context of avoiding possible negative environmental impacts from our production activities, we apply to each unit a specific procedure according to which various environmental aspects are identified and evaluated.

Specific steps of the process:



We invest in high efficiency units

ELPEDISON's investment in natural gas, the cleanest fossil fuel for electricity generation, is just the beginning. Technologies and applications linked to renewable energy will follow. With the help of research and technology, responsible power generation methods, that respect the environment, are selected. The promotion of the model of sustainable development is applied in both ELPEDISON power plants, in Thessaloniki and Thisvi, through:

- The adoption of state-of-the-art environmental management systems
- The implementation of activities to protect air quality, climate, soil, subsoil, nature and the natural environment
- Specific actions to minimize noise, vibration and electromagnetic fields
- Liquid waste proper management
- Solid hazardous and non-hazardous waste proper management
- The continuous use of programs, for the training and awareness of the employees and the external contractors of the units

Our responsible production units

At ELPEDISON our goal is to produce energy with the least possible impact on the environment. Through our two privately owned and modern units in Thessaloniki and Thisvi, we aim for the

responsible management of electricity generation in a way that contributes to the protection and promotion of local biodiversity, which are the sustainable development goals of the company.

The Unit of Thessaloniki

The power plant in Thessaloniki is the first large-scale private investment in the Greek energy sector, with a capacity of 400 MW, which is a gas-fired unit.

The plant's operation is based on the combined cycle Gas Turbine technology, that optimizes its performance factor and offers the most efficient conversion of the energy generated from natural gas, into electricity. At the same time, the combined cycle method offers significant financial and environmental benefits.

The unit, which was upgraded with an investment of €20m., has been designed in accordance with the latest and most stringent international regulations and specifications, while its operation is in compliance with the relevant Greek and European legislation, both technologically and environmentally.

The Unit of Thisvi

The unit in Thisvi, Viotia, is the second natural gas combined cycle power unit, with a capacity of 420 MW. The unit operates since the completion of its construction. Through the use of state-of-the-art technology, the unit combines maximum performance with minimal environmental encumbrance, without affecting the area's microclimate, ensuring the conservation of biodiversity

The modern plant facility is located on 100 acres of private land in Thisvi's Industrial Zone. The unit operates under a context of clearly defined boundaries and land uses, approved street plan and infrastructure, thus ensuring both the minimization of any environmental impact and further industrial development.

€20 m.

For upgrading the plant of Thessaloniki

We operate responsibly towards the environment

Water use

The requirements of the Thisvi unit for water are minimized through the adoption of the Air-Cooling technology for the main power generation process and the residual auxiliary water needs are covered by the existing industrial network, which is supplied by Mornos, and has a sufficient water supply throughout the year. The plumbing design of the existing power station was based on the principle of minimum water consumption, minimizing the use of natural resources.

Regarding the Thessaloniki production unit, the water requirements are covered by seawater, both for indirect cooling of the main power generation process and for the residual auxiliary water needs.

Liquid and solid waste

During the operation of the combined cycle units there is no production of liquid waste from the production process, since no water is used in the production of electricity as a raw material. The liquid waste generated comes from the auxiliary functions of the facility.

The sludge resulting from the maintenance and requirements of the equipment, based on the Environmental Impact Study, are estimated to be in very small quantities and stored in barrels and their final disposal is done in specially authorized bodies.

In addition, the production of electricity through the combustion of natural gas does not lead to the production of solid and toxic waste.

Our performance

[GRI 103-3, GRI 304-1, GRI 304-2]

	2020	2021
Significant direct and indirect impacts on biodiversity from the activities	0	0
Plants in protected areas and areas of high biodiversity value	<p>The Thessaloniki production unit is located in Ionia Industrial Area, which is characterized as low biodiversity due to the industrial facilities located in the area. The Thermaic gulf, from which water is pumped, is not characterized as a protected area that needs water protection.</p> <p>The Thisvi production unit is located in an Industrial Area, which is characterized as low biodiversity. The Corinth gulf is not affected by the operation of the unit.</p>	

1.3 Providing solutions that reduce the environmental impact of our customers



[GRI 103-2]



Our approach

For ELPEDISON, energy is not just a social good. It is important that our customers have a choice, both in the way in which the energy they wish to consume is produced and in the technology used to utilize resources with respect for the environment in the context of their sustainable conservation.

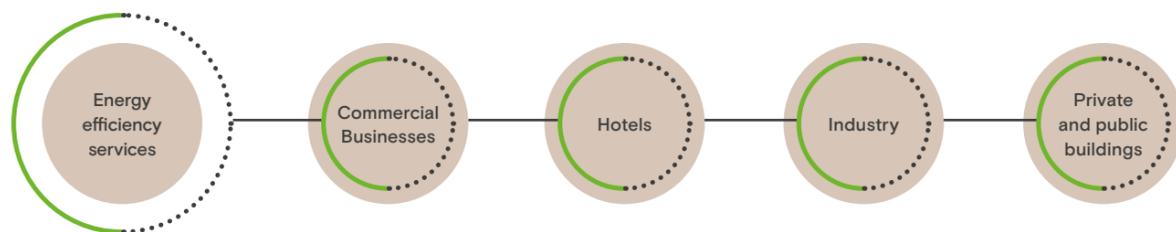
At ELPEDISON, sustainable development is our business goal, and innovation is the tool to achieve it. We innovate through a range of products and services that create value not only for our own customers, but also for society, and which at the same time contribute to addressing the current challenges facing the planet from climate change.

We support Greek companies through bespoke solutions that allow them to use energy more efficiently, emit less carbon dioxide and reduce their operating costs. The digitization and the new technology we use accelerate this process. It creates new opportunities, such as self-production from renewable sources and self-consumption, digital energy management and smart building technology. Also, technologies such as the Internet of Things (IoT) and Artificial Intelligence (AI) help to upgrade the services and experiences of our customers, enabling them to manage directly and in real time with the energy they consume through the application of smart and technologically advanced systems. Customers who trust us, are now seeking for smart solutions at the lowest possible cost to the environment.

Energy efficiency services

At ELPEDISON we listen to the business needs, evaluate international trends and good practices, but also developments in the field of energy by offering comprehensive cutting-edge proposals

that apply to different business sectors, as well as specialized services adjusted to small businesses and household customer needs.



In order to maximize the value, we create to our customers, but also to the environment, we offer the following service pillars:



Distributed generation services

With the PV Net Metering service, every customer has the opportunity to produce the energy they consume, achieving a reduction in energy costs and carbon dioxide (CO₂) emissions. Through the service, our customers contribute to the protection of the environment without being affected by future changes in the energy costs. PV Net Metering is an ideal solution for any customer, household, professional but also small and large business, who wants to reduce the cost of electricity with the power of the sun, installing an energy system, in which, the excess energy produced is not lost but stored in the network.

Moreover, with the implementation of projects that support the production of energy through the application of small wind turbines in commercial buildings, as well as through projects for the development of high performance Combined heat and power (CHP) installations in large commercial and industrial buildings, a significant reduction in the energy and environmental footprint of units can be achieved.



Energy efficiency upgrade services

ELPEDISON offers turnkey solutions of energy efficiency projects, as it undertakes the design of the project, the supply and installation of the necessary equipment, as well as the services of maintenance and certification of the operational efficiency of the new equipment. More specifically, ELPEDISON carries out interventions and provides solutions to both active and passive systems of building installations such as the following:

- Upgrading and optimizing the operation of heating, cooling and ventilation systems
- Upgrading and optimizing the operation of industrial equipment systems (burners, compressed air, pumps, etc.)
- Lighting upgrade with LED equivalents
- Design and development of automation systems
- Installation of power optimization and power quality devices
- Installation of energy storage systems



Facility Energy Management services

The ELPEDISON Facility Energy Management service is an important tool for companies, as it helps them better understand the energy needs of their facilities, in order to better manage their energy consumption. The ultimate goal of this service is to help our customers consume only the energy that is really needed for their business, thus reducing the overall energy cost.

Specifically, the ELPEDISON Facility Energy Management service provides the ability to monitor and collect real-time consumption data for commercial and industrial installations, individual operations of Electromechanical systems or parts of the production of industrial installations. In addition, the service offers access to valuable information through an easy to use online tool, the ability for our customers to receive automatic alerts (alarms, alerts), as well as smart reporting and data analysis tools.

Thanks to the new service, our customers have at their disposal the necessary information to better manage their energy, to make their facilities more efficient, to optimize their productivity, to increase the life of their equipment, to reduce costs energy and maintenance and therefore their overall impact on the environment.

The ELPEDISON Facility Energy Management service is provided through a simple and complete 360° solution, which we have formulated with a very customer-centric approach. This solution includes the installation of the necessary metering equipment, the development of a platform based on a user friendly navigation to monitor their consumption in real time, technical support, as well as the ability to provide energy management and efficiency services.



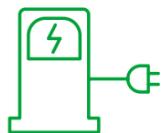
Energy Monitoring and Consulting Support Services

Aiming at satisfying our business customers energy needs, ELPEDISON offers the following services that will help customers, reduce their operational costs and environmental footprint:

- Energy audit
- Installation of energy metering and the development of smart platforms.
- Continuous and real time monitoring of our customers' energy consumption through specially designed platforms.

- Study and simulation of the thermal loads and energy needs of the company.
- Thermal and visual comfort control.
- "Reporting" services and provision of bespoke recommendation reports to improve energy efficiency.





Electrical vehicle charging services

At ELPEDISON with the specialization, the know-how and with strategic collaborations, we are able to offer a complete charging and electrification solution, the ELPEDISON DriveGreen Business service. The service includes the development and inspection of the installation of the selected equipment at the facilities of our customers. Specifically, the service enables our customers, households and businesses to:

- Be informed about the capacity of their existing electrical installation, in terms of charging electric vehicles

- Make the right decisions in choosing the appropriate charging equipment for their electric vehicles
- Install all vehicle charging systems safely by certified officers
- Get innovative EV chargers with a huge range of functions
- Manage EV chargers through the Cloud platform
- Reduce their carbon footprint
- Further improve their corporate image



Issuance of green energy certificates

At ELPEDISON we actively care about the environment and offer our customers the ELPEDISON Green service and the ELPEDISON Green Certificate service.

ELPEDISON Green and ELPEDISON Green Certificate, are services that allow access to certified "green" energy, produced 100% from renewable sources. With these services, for every megawatt hour (MWh) of electricity

consumed, ELPEDISON supplies the same amount of guarantees of origin, which it secures through local producers of renewable energy sources (solar and wind).

By choosing these services, we enable our customers, households and business customers, to enhance sustainable development by contributing to the financing of new renewable energy units in Greece.

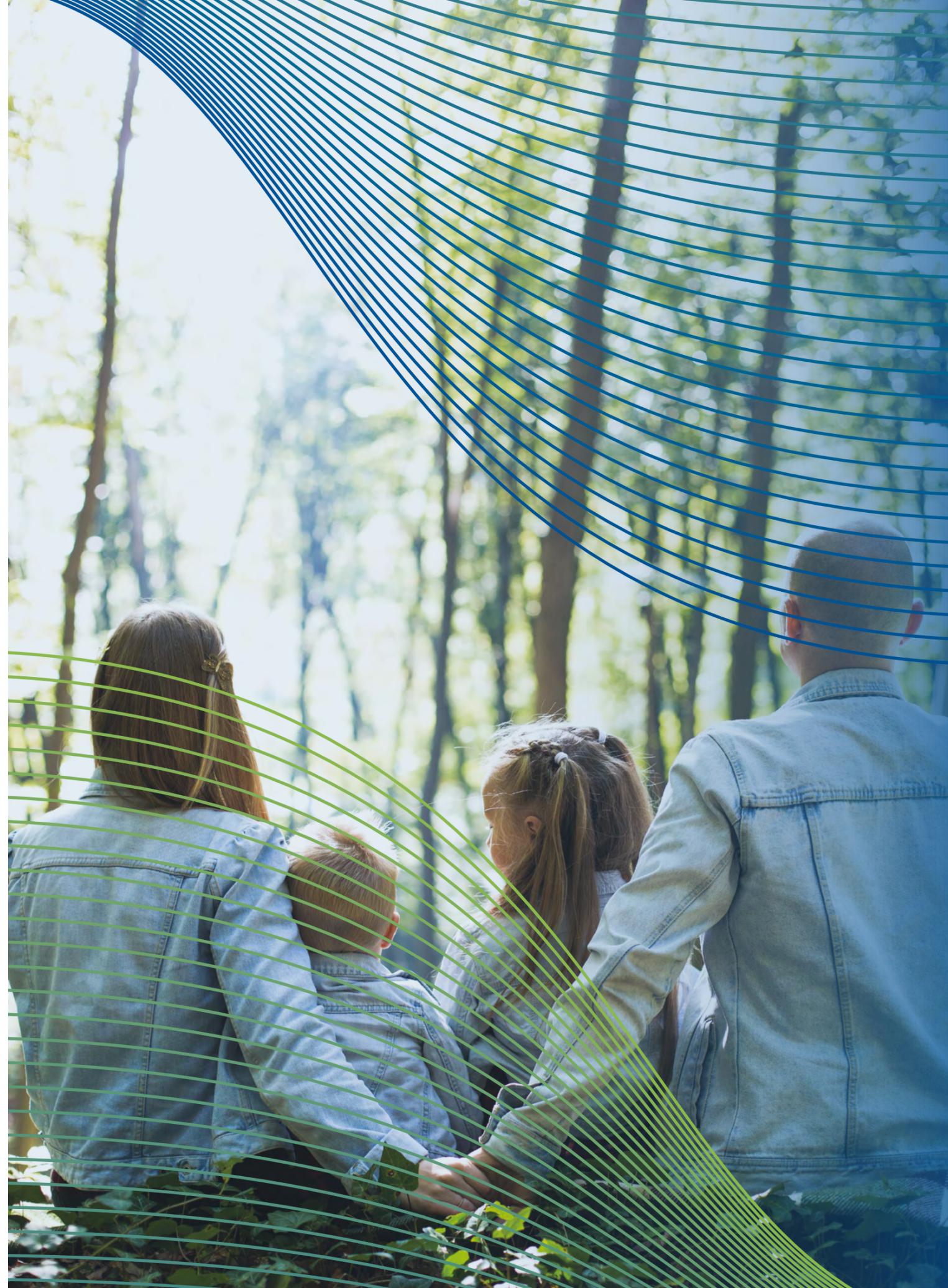
Our performance

[GRI 103-3, ELPEDISON Indicator]

Through the energy efficiency services we provided to our customers since 2020, we conducted studies and developed recommendation reports for projects that can

have a positive impact on the environment, contributing to the reduction of air emissions by reducing energy consumption by 2,524 MWh.

Categories of services	Type of service	2020		2021	
		Number of projects	Estimated energy reduction (MWh)	Number of projects	Estimated energy reduction (MWh)
Distributed generation services	• Development PV Net Metering systems	>10	177	>40	2,314
Site upgrade services	• Upgrading of central heating system	—	—	1	32.95
Total		>10	177	>40	2,347



B.2

Society

2.1

Generating and distributing direct and indirect economic value

52

2.2

Providing solutions that ensure access to affordable energy

56

2.3

Ensuring the health, safety and wellbeing of employees

59

2.4

Participating and investing in local communities

68



2.1 Generating and distributing direct and indirect economic value



[GRI 103-2]



Our approach

Our company creates economic value for its stakeholders through its business activities, contributing to the economy, employment and the development of local communities. Through the production and supply of energy, but also through the specialized services we offer, we support incomes and jobs, we generate tax revenues to the State, as well as jobs throughout our value chain. Therefore, we produce and distribute direct and indirect economic value, creating a positive footprint in the company itself, but also in the domestic market, as well as in multiple sectors.

Over time, ELPEDISON has demonstrated consistent strategic planning and developed financial and operational management. Through the continuous development of our business activity and the release of resources for investments in innovative products of electricity and natural gas, but also in high-tech services, we look forward to a future that will bear fruit both to the company and its stakeholders and to the local society in which we operate. Focusing on best practices of energy production and management,

we implement programs with emphasis on the supply chain that improve the efficiency of the various operations of our company.

Always guided by the rules and the culture of ELPEDISON, we make investments that support and strengthen our main business activity with the aim of creating a sustainable model of business development. With €561 m. in investments in the last 17 years and with the modernization of our production unit in Thessaloniki, at a cost of over €20 m., we demonstrated in practice our commitment to the quality upgrade of our productive activities. This state-of-the-art unit will add the necessary production capacity to support the estimated growth, while providing the necessary infrastructure to achieve significant technological improvements. At the same time, we are particularly focused on fundamental growth factors, such as the innovation of our services, which will help to further increase our financial performance



We demonstrate in practice our commitment to the quality upgrade of our productive activities.

€561 m.

Investments
(2005-2021)

€575 k.

Investments in social
contribution programs, with
a focus on society and the
environment, during 2019-
2021

€1,493 m.

Direct distributed
economic value in 2021

€1,491 m.

Turnover in 2021

Creating value during the COVID-19 pandemic

2020 was marked by the global spread of the COVID-19 pandemic, which affected the global market, consumer behavior and the socio-economic environment. Overall, the utility sector (electricity and natural gas) was less affected than other sectors, with total electricity demand in Greece in 2020 lower by 4.3% than in 2019. Nevertheless, ELPEDISON showed resilience in terms of customer representation with a 12.8% increase in customer base in electricity and a vertical increase in its profitability in 2021.

ELPEDISON, with its experience in the operation in times of recession and uncertainty, took measures and managed to protect not only the health and safety of our people, but also to ensure the business continuity of all production units and the uninterrupted coverage of our customers energy needs.

Our company's immediate response to intense market challenges is based on our flexibility, immediate decision-making and timely response to the ever-changing needs and demands of our customers and consumers as a whole, always taking into account regulatory principles and the general institutional frame. With competitive pricing policies in our products and with our innovative services available, we have managed and successfully dealt with market volatility, while maintaining the trust of our customers.

2021 was a year of strong performance and significant progress for ELPEDISON, as despite the global challenges of the COVID-19 pandemic, we continued seamlessly our business activity, achieving full business continuity, while creating value in a dynamic operating environment.

Our performance

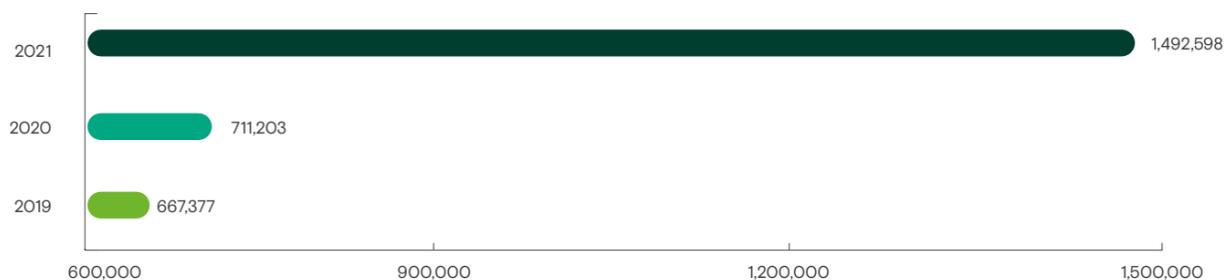
[GRI 103-3, GRI 102-7, GRI 201-1]

ELPEDISON 2021 economic performance

- The company's turnover during the year 2021 amounted to €1,491.1 m. compared to €684.9 m. in the corresponding period of 2020
- Gross profit amounted to €101.48 m. for the

- year 2021, compared to €36.3 m. the previous year
- Profit after taxes in the year 2021 amounted to €52.6 m., compared to profit taxes amounting to €16.9 m. in 2020

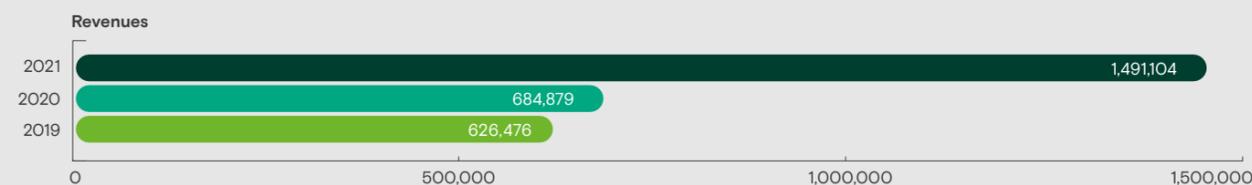
Economic value distributed (in thousand €)



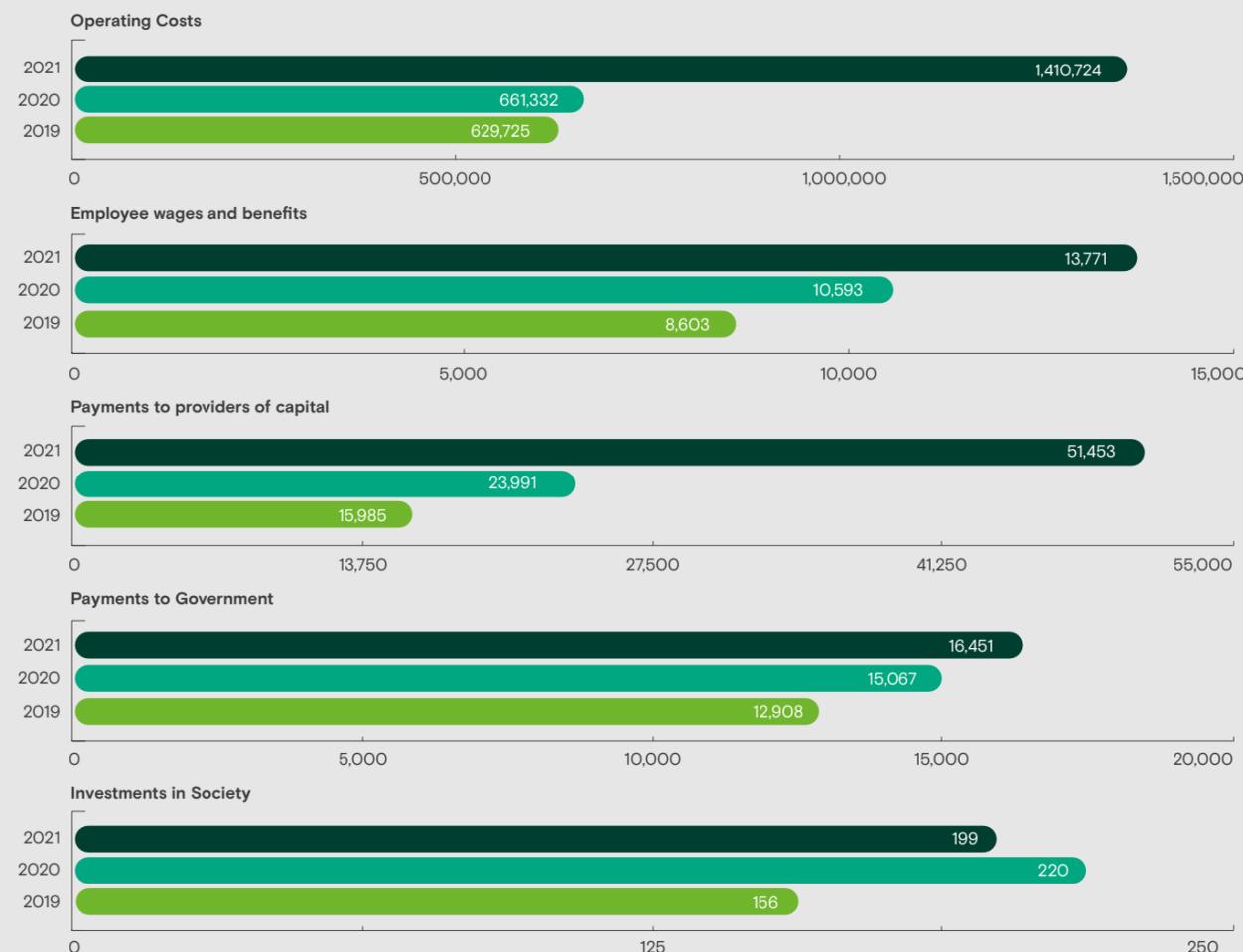
Direct economic value generated (in thousand €)	Direct economic value generated and distributed		
	2019	2020	2021
Revenues	626,476	684,879	1,491,104
Economic value distributed (in thousand €)			
Operating Costs	629,725	661,332	1,410,724
Employee wages and benefits	8,603	10,593	13,771
Payments to providers of capital	15,985	23,991	51,453
Payments to Government	12,908	15,067	16,451
Investments in Society	156	220	199
Total	667,377	711,203	1,492,598
Economic value retained (in thousand €)			
Total*	-40,901	-26,324	-1,494

*The negative economic value retained is due to the losses presented by the company in 2019-2021. More information is available in the annual financial statements on the company's website.

Direct economic value generated (in thousand €)



Economic value distributed (in thousand €)



2.2 Providing solutions that ensure access to affordable energy



[GRI 103-2]



Our approach

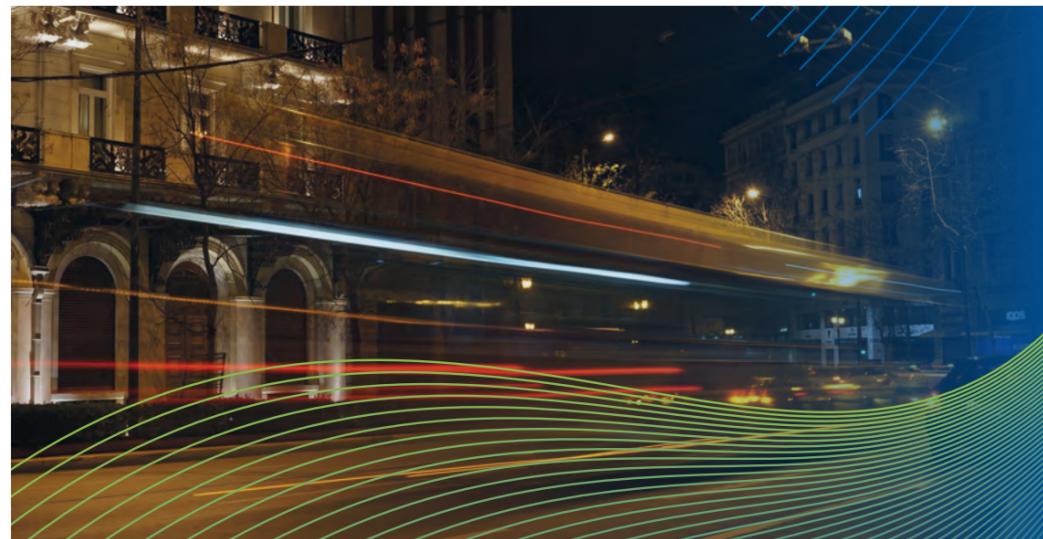
At ELPEDISON we recognize that energy is central to every great challenge and opportunity facing the world today. Access to energy plays a fundamental role in sustainable economic growth and social prosperity.

We advocate that maximizing the use of renewable energy sources, improving energy efficiency and access to modern energy services are the ideal way for the international community to ensure universal access to energy, while reducing prices and tackling climate change at the same time.

We manage energy in a way that is accessible to everyone

means access to the full range of energy services, in addition to basic electricity needs such as lighting, water heating, heating and cooling and access in communication.

At our company, we take into account that access to modern, sustainable energy services for all



ELPEDISON considers that energy, as a basic asset, should be accessible to all.

We formulate an affordable pricing policy for everyone

One of the goals of our company is to provide sustainable electricity and natural gas at the lowest possible price. Energy becomes available when a balance is struck between our business goals and the needs of our customers. In accordance with the legal and institutional framework, ELPEDISON considers that energy, as a basic good, should be accessible to all.

In 2021, the average selling price of electricity for household customers was €150.23 / MWh and for business customers €140.66 / MWh.

On average, each month, an average household customer represented by ELPEDISON spent €56.34 on their electricity bill, while their natural gas bill was €48 per month.

We listen to the needs of our customers

At ELPEDISON we support the needs of customers belonging to socially vulnerable groups, while we support non-governmental organizations, social enterprises, institutions, and other voluntary organizations through discounts. More specifically, in our company we take into consideration specific criteria (as defined internally), in order to represent customers and consumers who are at a disadvantage:

- People who need special treatment due to health problems
- People who have stayed or are unemployed for a long time
- People with low incomes

In addition, at ELPEDISON we strive to provide energy and build relationships with customers that create significant value for society as a whole:

- Hospitals
- Churches
- Non-Governmental Organizations (NGOs)

We offer services that create value for our customers

In the context of creating affordable price and accessibility to energy as a key asset, we provide services that create value for our customers by improving energy efficiency and reducing operating costs in homes and businesses. More information is available in section B.1.3 "Providing solutions that reduce the environmental impact of our customers".

In addition, through other programs, such as the combined energy service with private insurance, we offer the possibility to "cover" the bills for up to 24 months for the entire insurance period, in case of job loss, illness or accident.

Our performance

[GRI 103-3, Δείκτης ELPEDISON]

	2020	2021
Category of customers per activity	Number of meters	
Activities of religious organizations	760	791
Special medical activities	314	365
Other human health activities	274	308
Provision of services to society as a whole	265	265
General medical professions	204	216
Activities of practicing medical and dental professions	185	199
Dental practice activities	163	173
Human health activities	59	62
Hospital activities	28	22
Exclusive nursing home activities for seniors and people with disabilities. Housing and care activities for the elderly and disabled	16	16
Exclusive nursing activities at home. Nursing and housing activities	4	4
Activities of a dedicated in-home nurse for mental disability, mental health and substance use. Housing and care activities for people with mental disability, psychological disorders and substance abuse	1	2
Other activities of a dedicated nurse at home. Other housing and hospitality activities (other activities of social welfare institutions with accommodation)	1	2
Total	2,274	2,425

2.3



Ensuring the health, safety and wellbeing of employees

[GRI 103-2, GRI 403-1, GRI 403-2, GRI 403-3, GRI 403-4, GRI 403-5, GRI 403-6, GRI 403-7, GRI 403-8]



Our approach

ELPEDISON's mission is to provide its customers with high quality energy products and services, in cooperation with its suppliers, with whom it takes care of the development and expansion of the use of those technologies that are the most efficient and fully compatible with the professional Health and Safety requirements.

The adoption of management systems, which comply with international standards, shows our commitment to go beyond simply complying with existing regulations. We promote a policy of continuous improvement, with a positive impact on the development of a security philosophy, in every aspect of our operation.

We consider the health and safety of our employees to be of utmost importance. For this reason, we have developed a specific Health and Safety Policy, which summarizes our goals on this topic. We are committed to achieving high performance in the Health and Safety field, to continuously improve the respective performance indicators and to comply with the current legal provisions. Its purpose is to prevent incidents that could lead to human injury or illness, as well as large-scale accidents.

In brief, we always take care to ensure:

- the implementation of legislation relating to Health and Safety,
- the development of an appropriate and effective Health and Safety Management System,
- the adequate and effective training of all employees, in order to increase their awareness on issues related to Health and Safety,
- the participation of all ELPEDISON employees in the implementation of the Health and Safety Policy,
- the formulation of specific requirements and specifications of Health and Safety for each employee who works at ELPEDISON and who works in our offices and plants,
- the definition of clear, measurable, realistic Health and Safety goals,
- the periodic review of the Health and Safety Management System and the existing Policy, in order to ensure the continuous improvement of our activities and the minimization of the cases of non-compliance, if any, with the relevant specifications and requirements.

Health and Safety Management

Occupational Health and Safety is a line of responsibility that starts from ELPEDISON's Management and reaches the production units, in all the areas where we operate. Our goal is

not only zero occupational accidents, but also the resolution of near misses, in which we act primarily in the prevention field. For this reason:

01

We follow the Health and Safety Policy, in order to constantly improve the Health and Safety conditions in the workplace. Therefore, it is stipulated that every employee must perform his/her duties in accordance with the safe work rules.

02

We apply within the integrated Management System, a specific Health and Safety Management Policy in production areas and offices, according to the certification we have received, based on ISO 45001: 2018 - Occupational Health and Safety Management System.

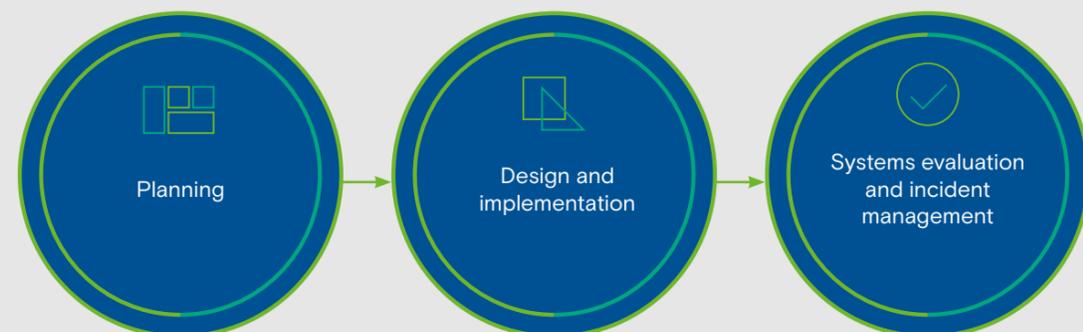
03

We have developed a practical Health and Safety Guide (Greek and English), which is distributed to all company staff, as well as to partners and visitors who enter our units. Our goal is the continuous and complete information of all interested parties about the ELPEDISON current Health and Safety practices and procedures.

04

We take care of all our staff training, regarding the knowledge of providing "First Aid", with specially designed seminars, which are held on a regular basis, by external partners. The ability to provide First Aid in case of need, both in the workplace and in general, on the street, at home, in a public place, is the greatest sign of responsibility and solidarity to our colleague and/or fellow human being.

Basic pillars of Health and Safety management



Planning

Health, Safety and Environment Committee

ELPEDISON has set up a Health, Safety and Environment Committee, in which company executives and senior management participate. Its main responsibility is the systematic monitoring and recording of all relevant issues, with the aim of the proper operation of the company's facilities in matters of Health and Safety. At the same time, regular internal audits are carried out in all production departments by the executives in charge of this responsibility and recommendations for improvement are submitted. In addition, monthly meetings have been established in which all members of the committee participate, in order to be informed and analyze issues that concern the employees' Health and Safety, but also to develop a plan for resolving and preventing incidents.

Roles and responsibilities

We have assigned the duties of a Safety Officer and Occupational Physician to each production unit, in accordance with the relevant legislation, who manages and undertakes issues related to illnesses and occupational accidents.

Health and Safety training

We focus on the ongoing training of our employees in Health and Safety issues. The training is provided through skills development training programs, but also through Health and Safety awareness programs, culture building, or training needs identified through the incident investigation or inspection process and approved by production unit committees.

This training is divided into two categories:

- the basic, which includes basic Health and Safety issues related to the workplace and is provided when hiring the employee,
- the specific, which includes specific Health and Safety issues, related to the duties, responsibilities, and workplace of each employee.

Both training categories are provided internally and externally by approved partners on a case by case basis.

Design and implementation

At ELPEDISON we systematically evaluate our performance in the Health and Safety field. We monitor the potential risks through the Occupational Risk Assessment Study in accordance with applicable law, in order to continuously ensure the appropriate Health and Safety conditions in the workplace.

The measures applied for the protection of workers from occupational hazards, arise after proper planning, taking into account the legal requirements and the systematic risk assessment. In summary, the measures and procedures applied are:

- Defining an emergency plan
- Incident recording
- Scheduled Health and Safety audits
- Monitoring the employees' health in the context of diseases
- Overview and review of management and prevention systems

Security

In addition, in the context of monitoring and risk assessment, we conducted a vulnerability study in the Thisvi and Thessaloniki production units,

the headquarters, in order to identify potential threats, assess the risk and make security recommendations. More specifically, during the assessments, a specific methodology was followed, according to which the following were implemented:

- recording and assessing the current security situation,
- analysis of each operational space and infrastructure of the installation,
- separation of spaces into safety zones.



Systems evaluation and incident management

Incident management is undertaken and systematically monitored by the safety officer of each production unit in collaboration with the employees. Specifically, meetings are held on a daily basis where issues arising from the previous

day are analyzed and recorded in the daily report. In addition, an evaluation of the Health and Safety systems is carried out every month, in order to ensure the implementation of the procedures and protection measures, as much as possible.



Our response to the COVID-19 pandemic

Since the beginning of the pandemic, the company has ensured and continues to ensure maximum security conditions for the protection of human resources, customers and the supply chain.

With the primary goal of protecting our employees' Health and Safety, we have taken specific and targeted actions, through a common and uniform framework for dealing with the pandemic, which includes:

Organizational measures

- Arrival planning at the company's offices, where remote work is not possible, preventing overcrowding during peak hours
- Remote work of the people working in the offices - as much as possible - according to the special provisions and implementation of a structured program of remote work in specific organizational units
- Recommendations of the occupational doctor for employees belonging to vulnerable groups
- Minimize events or meetings with external visitors
- Minimize Business trips
- Postponement of scheduled workshops and seminars
- Adjust staff access to common areas, such as changing rooms, toilets, kitchen, etc., in order to reduce congestion and ensure that distances are maintained

Personal hygiene measures

- Application of good personal hygiene practices (hand disinfection, etc.) and use of antiseptic
- Provide antiseptic in all workplaces and protective face masks
- Avoid making meals in places other than specially designed areas
- Supply and installation of waste bins with lids for disposal of disposable materials, such as wipes, paper towels or other materials used to disinfect surfaces or objects in the workplace
- Creation of a psychological support hotline for employees, which is implemented with the cooperation of expert consultants
- Continuous provisions of information to the staff about the actions we implement, in order to deal with the pandemic
- Carrying out COVID-19 detection test (PCR) on all company employees at home (August-September 2021)
- Carrying out COVID-19 detection test (self-tests) on the company's employees, based on the official instructions of the Authorities
- Provision of free self-tests to each employee



Since the beginning of the pandemic, the company has ensured and continues to ensure maximum security conditions for the protection of human resources, customers and the supply chain.



Our performance

[GRI 103-3, GRI 403-9]

	2019	2020	2021
Work-related injuries (offices and privately owned store)			
Employees			
Working hours	336,224	436,240	480,928
Number of fatalities as a result of work-related injury	0	0	0
Rate of fatalities as a result of work-related injury	0	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0	0
Rate of high-consequence work-related injuries (excluding fatalities)	0	0	0
Number of recordable work-related injuries	0	0	0
Percentage of recordable work-related injuries	0	0	0

Note: Part of our business activity is assigned to third companies.

	2019	2020	2021
Work-related injuries (production units)			
Employees			
Working hours	120,840	104,920	102,452
Number of fatalities as a result of work-related injury	0	0	0
Rate of fatalities as a result of work-related injury	0	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0	0
Rate of high-consequence work-related injuries (excluding fatalities)	0	0	0
Number of recordable work-related injuries	0	0	0
Percentage of recordable work-related injuries	0	0	0

Note: Part of our business activity is assigned to third companies.

2.4 Participating and investing in local communities



We are firmly committed to strengthening our ties with the communities in which we operate, seeking ongoing dialogue with all stakeholders and establishing a lasting relationship with local stakeholders to meet their needs and expectations.

To this end, ELPEDISON contributes to the following pillars of action:

Supporting local employment

- We strive over time to meet our staffing needs through the employment of people from the local labor market.
- We collaborated with more than 200 local contractors and subcontractors during the Thisvi unit construction. At the same time, we have employed a significant number of people through partnerships, mainly to support work and services
- Regarding the Thessaloniki Plant upgrade, more than 400 people from General Electric and sub contractors were occupied during the project's implementation.

Ensuring health and social prosperity

- We support critical areas for the local communities' prosperity.
- During 2020-2021, a period with multiple sanitary and social challenges, we created a relief chain, with the aim of responding immediately to the call for humanitarian aid.



We created a relief chain, with the aim of responding immediately to the call for humanitarian aid.

- We stood by the hospitals on the front line of COVID-19. We responded immediately to the needs for providing support to hospitals in Attica and Thessaloniki, offering significant assistance, by providing technological equipment and consumables, following the needs indicated by the hospitals themselves and following the prescribed procedures.
- We funded and carried out, in collaboration with IKPI, a study to record the factors and conditions that affect the quality of life of the inhabitants of a remote island in the Cyclades, according to a special questionnaire designed according to the standards of the globally-recognized model by the World Health Organization (WHO).
- For another consecutive year, we gave smile to children who remained hospitalized, during Christmas festive days, in children's hospitals of Athens and Thessaloniki, proving our commitment for continuous support to vulnerable groups of people, with an emphasis on children. Children of all ages, received gifts and toys in their rooms, according to the Hospital's safety protocols, due to the pandemic. The Hospitals were three in Athens including Agia Sofia Children, P. & Ag. Kyriakou, and Pentelis Children Hospital, as well as three in Thessaloniki, GNTH Ippokratia, AHEPA and Papageorgiou.

- We were next to the municipalities of Central Macedonia, offering food orders that covered the basic needs of people facing financial hardship during Christmas. The meal vouchers were received by members of the local government on Christmas Eve, distributing them to families facing serious financial difficulties.
 - In ELPEDISON, we confirmed our commitment to stand next to the Greek society and the environment, implementing one more initiative towards sustainability and environmental protection. In the context of our presence at the 85th TIF we asked from our stand's visitors to smile for a good cause, contributing in the reforestation of the forests suffered from the recent wild fires in Greece.
- Our stand's visitors had the chance to choose their favorite "green" background, offer their brightest smile and we then offered an amount for each photo, supporting the areas affected by the recent fires. Along with their contribution to our forests revival, our visitors received a giveaway, while also participating in a draw for special presents.
- In the context of the European Mobility Week, held in 16 - 22 September, we were among the major sponsors of the Municipality of Thiva (in cooperation with Thisvi power plant).



- ✓ Supporting local employment
- ✓ Ensuring health and social prosperity
- ✓ Enhancing the education and development of the people

Enhancing the education and development of the people

- In the context of ensuring social development and education, we are developing a series of initiatives aimed at supporting young people and improving education infrastructure.
- In 2020, we undertook the restoration work of the building facilities of the school of Dombraina.
- We sought to inform our young and old people about the value of energy saving and sustainable development and how to achieve it.
- During 2021, we distributed 24,000 books to Hospitals all over the country, during the Easter days, after the collaboration of ELPEDISON and the newspaper "Ark of Orthodoxy". ELPEDISON undertook the transfer of the books to the Dioceses throughout Greece and they were then distributed to patients as well as hospital health staff, who have been at the forefront of dealing with the pandemic that is plaguing the country.
- We support socially vulnerable groups, with emphasis on young people and children, but also the wider Greek society, performing for the second consecutive year, in collaboration with the Theater of Neos Kosmos, theatrical performances with the adaptation of the story of the child hero Pinocchio, in the largest children's hospitals of Athens and Thessaloniki.
- We donated tables to primary schools in central Macedonia, supporting the distance learning program.
- We proceeded with the financing of the reconstruction of a model kindergarten of the Holy Temple of Agios Panteleimon of Ampelokipi, of the Holy Metropolis of Naples and Stavroupolis.
- In 2021 we were the sponsor of the initiative "Offer kilometers to Syzoi", organized by Syzoi, a Non - profit organization made by parents and friends of visually impaired children with additional disabilities (mental disabilities, autism, etc.). Syzoi called the public, through a digital campaign, to run for a good cause, collect kilometers and support kids with serious eye disorders. The initiative's goal was to collect 6.000 kilometers in total, while we turned the distance to euros, offering 6.000€ to Syzoi. The amount will cover the expenses of specially designed educational programs for the kids. The initiative was launched on December 1st and lasted for 13 days, until 6.000 kilometers were collected.
- We funded the replacement of bulbs at the football and basketball courts of the children's camp facilities of the Holy Metropolis of Neapolis and Stavroupolis, aiming to further enhance the camp's energy efficiency.

"Ενεργοποιώ" program

By announcing its new CSR program, "Ενεργοποιώ", ELPEDISON, continues a series of initiatives which have been implemented in recent years and which -among other things- include the support of the local communities in which we operate, as well as individual social groups, synergies with Foundations and NGOs and the training of young and older people, on the value of energy savings and sustainable development as a whole. For all these practices, the Company won the CRI Silver award in 2020 and a special commendation for its actions in the Environment category.

At the same time, we supported our local operating communities with various benefits and aids. In addition, in collaboration with the Hellenic Ministry of Education and Religious Affairs, we donated state-of-the-art tablets to primary schools, supporting the distance education.

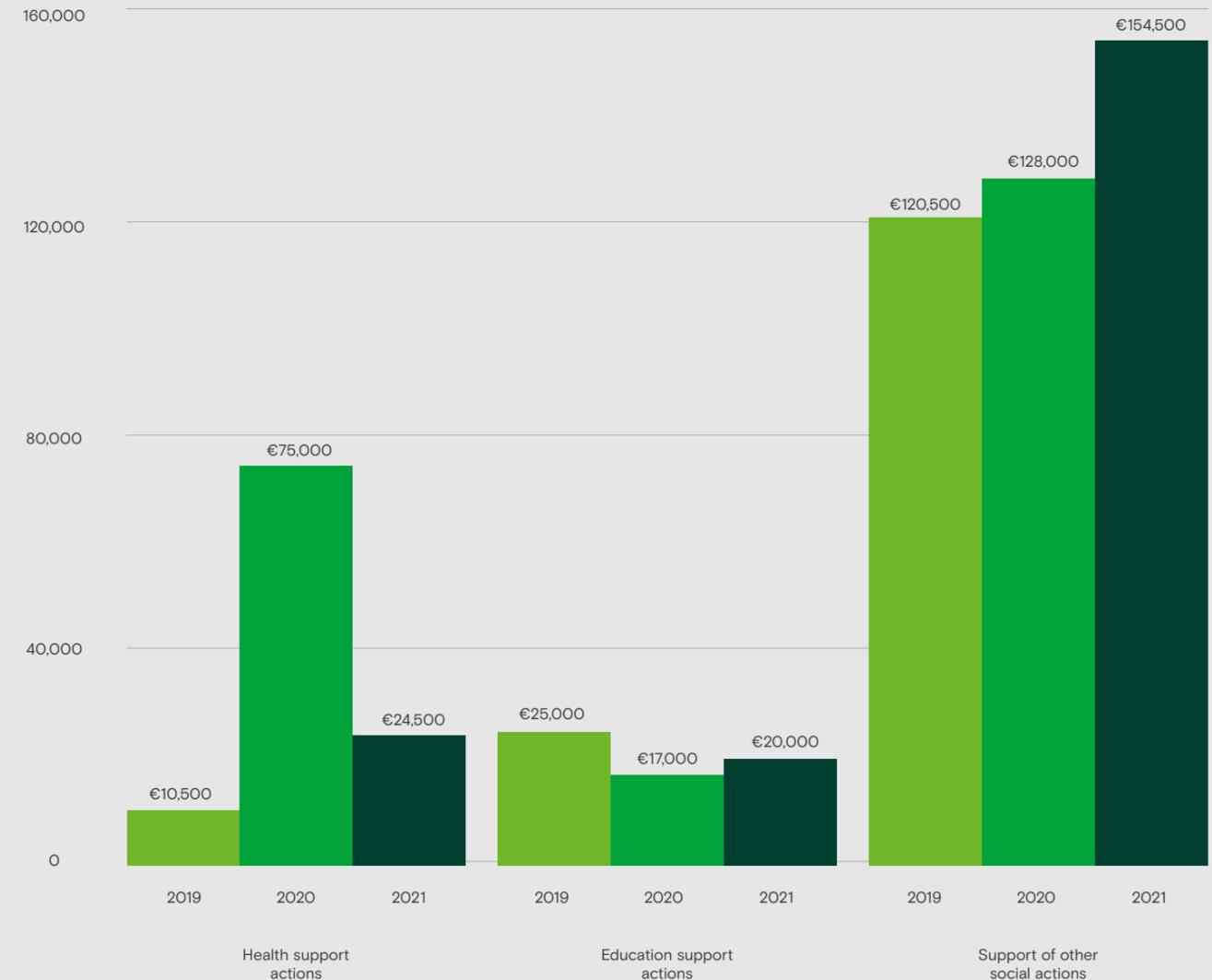
Overall in 2020-2021 we proceeded with the following collaborations:

- Cooperation - donation to ELEPAP and ELEPAP Thessaloniki
- Cooperation with the Non-profit Organization Syzoi
- Support of the Holy Metropolis of Neapolis and Stavroupolis
- Support of the Municipality of Thiva

- Participation in the 85th TIF and initiative for the reforestation of forests that have suffered from recent wild fires
- Collaboration - donation to Make A Wish Greece
- Cooperation with the Hellenic Ministry of Education and Religious Affairs for the donation of tablets to schools in Northern Greece
- Cooperation with the Institute of Social and Preventive Medicine for the sponsorship of Health Profile research in the Municipality of Amorgos
- Cooperation with the hospitals Attikon University Hospital, AHEPA University General Hospital and Sotiria Thoracic Diseases Hospital of Athens for the donation of consumables and radiological equipment
- Cooperation with the Non-profit Environmental Organization We4all, for the support of the reforestation of fire-affected areas
- Cooperation with "Smile of the Child" for the coverage of the expenses of special medical treatments for 7 children living in the organization's house in Kerkyra
- Cooperation - support through sponsoring of the EBEC (European BEST Engineering Competition) in Greece, organized by BEST (Board of European Students of Technology)

Our total contribution to the local community, from 2019 reaches €575,000.

Social contribution (€)



€ 575,000

Our total contribution to the local community, from 2019

B.3

Corporate Governance

3.1

Ensuring corporate governance, regulatory compliance and business ethics

3.2

Ensuring emergency preparedness



3.1 Ensuring corporate governance, regulatory compliance and business ethics



[GRI 102-18, GRI 103-2]

Our approach



At ELPEDISON we are guided by our Values. Values that express the sense of responsibility and which are always at the core of our corporate decisions, defining all our activities. Our goals and commitments are achieved through:

- Compliance with legislation
- Compliance with the Code of Ethics

- Compliance with the employee Code of Conduct
- Compliance with the Elpedison Management Framework (EMF), as well as
- Through the effective organization and operation of corporate governance bodies, which include the Board of Directors and the Internal Audit Committee.

Compliance with legislation

ELPEDISON operates in a strictly regulated framework which is monitored jointly and in cooperation between the Regulatory Affairs Department and the Legal Department, with the aim of guiding and providing advice to all other departments of the company. At the same time, the Legal Department ensures the

compliance with the general legislation, as well as the response to the requests and actions towards the company on behalf of all kinds of authorities and bodies.

Code of Ethics

At ELPEDISON, Management has established a Code of Ethics which concerns the compliance of both employees and suppliers/partners. In this context, we make a clear commitment, applying the principles of integrity and transparency, to all our stakeholders. We believe that every employee and partner/supplier of ELPEDISON should know the position of the company

towards legal, ethical and social issues which impact the way in which the company operates, as well as, the rules that govern it. The Code contains the rules that define the behavior that must be followed consistently throughout the operation of ELPEDISON activities. The principles mentioned in the Code should guide us in our daily business relationships, providing us with



The way we achieve our business results is just as important as achieving them.

a framework of standards for good behavior in accordance with our corporate values. The way in which we achieve our business results is just as important as achieving them.

The Code applies to all our employees and suppliers/partners. More specifically, all employees and suppliers/partners are obligated to adopt a policy of 'zero tolerance' in cases of illegal or unethical behavior.

The Code of Ethics includes flowing principles, guidelines, rules, and procedures:

- Compliance with antitrust laws
- Management of confidential information
- Protection of company assets
- Justice and Honesty
- Human Rights – Diversity and Inclusion
- Discrimination and harassment in the workplace
- Personal data protection
- Copyright laws
- Bribery and corruption
- Transparency of integrity
- Conflicts of interest
- Combatting money laundering through illegal activities (AML)

Employee Code of Conduct

The effectiveness of the Code is based on the commitment and support from all of us, with special emphasis given to the prevention of any corruptive behavior in the following areas:

- Recruitment process
- Employee training
- Employee rights and benefits
- Obligation of employees at work
- Rules of Administrative Conduct

- Disciplinary checks
- Violations of regulations
- Disciplinary offenses and sanctions

The principles mentioned in the Code should guide us in our daily behavior and in our decisions, providing us with a framework of standards for proper behavior in accordance with our corporate values.

Corporate Management Framework

The ELPEDISON Company Culture calls for respect of certain principles, which are expected to create the environment within which we will be able to implement our vision and achieve the following strategic objectives:

1. Safe, effective, efficient, transparent, reliable, ethical and socially responsible operations
2. True, accurate, complete and reliable internal and external financial and non-financial reporting and
3. Compliance with applicable laws and regulations (internal or external)

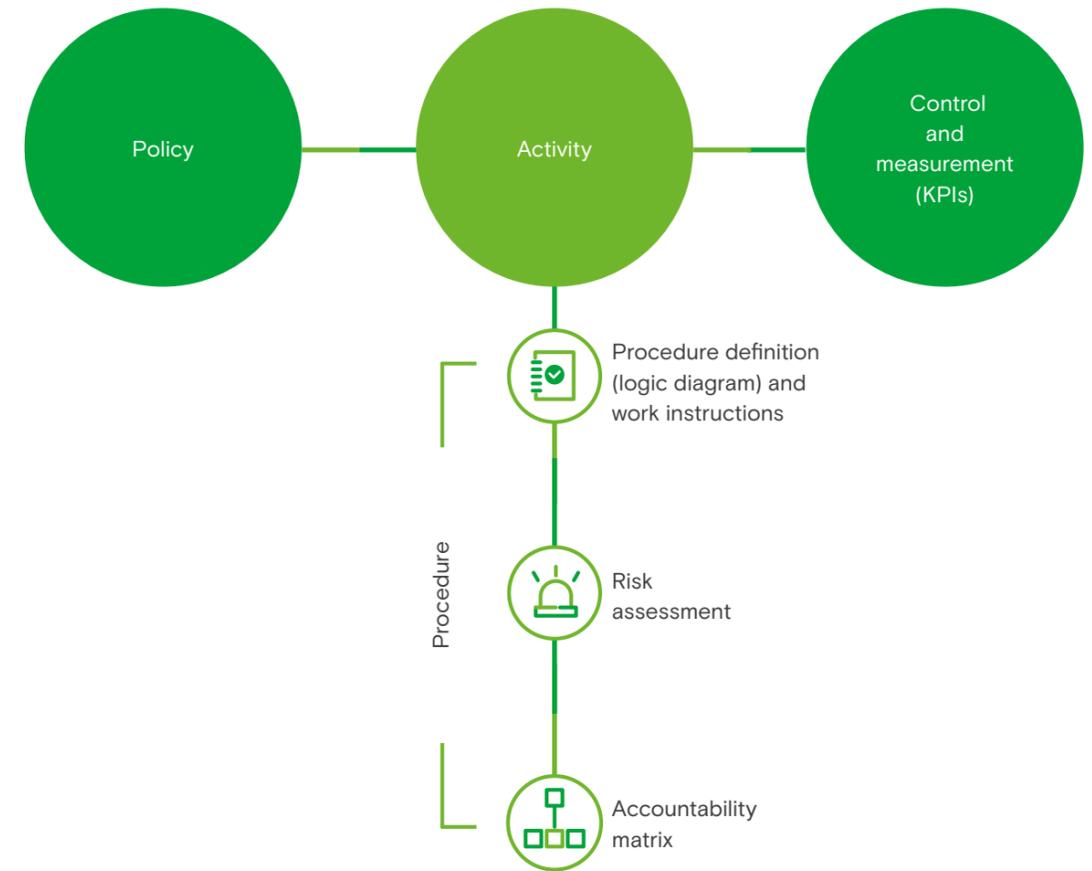
The set of Systems translates BoD expectations into Operational Requirements, to be implemented within the organization and it is to be used by ELPEDISON employees as guidance in implementing a Management Framework, consistent with the aforementioned strategic objectives.

In particular, the ELPEDISON Management Framework (EMF) establishes control activities, in order to ensure that the above strategic objectives are pursued and that actions are taken to address risks affecting the achievement of those objectives.

All ELPEDISON employees and partners have to respect the EMF, while operating within or with ELPEDISON. The ELPEDISON Management Framework (EMF) provides a structured approach for respecting this commitment, while it consists of 18 Systems. These Systems are properly designed and documented so that they address all the shareholders' expectations:

1. Administrative leadership, commitment and accountability
2. Risk management and internal control
3. Human resources
4. Ethics and compliance
5. Health and Safety, Environment and Safety (facilities)
6. Operations
7. Project development, approval, execution and control
8. Energy management
9. Commercial
10. Financing and control
11. Purchases
12. Change management
13. Quality
14. Data and information
15. Communication and Investment in local communities
16. Crisis and emergency management
17. Sustainable Development and Innovation
18. Evaluation, Continuous Improvement and investigation incidents/discrepancies

Each system consists of:



At ELPEDISON we are committed to complying with the policies and procedures described in the 18 systems of the Corporate Management Framework.

In application of the Corporate Management Framework (Management Framework) we implement an Internal Control System (Internal Control System) that consists of five areas of focus, always related to our vision, mission and values. It concerns a process that is implemented by the Board of Directors, the Management and all the people of our company and is

designed to provide reasonable assurance in relation to the achievement of our business goals. The following is a brief overview of this Framework, the areas of focus and the related actions that accompany them, while the following pages indicatively present more information in relation to specific actions that constitute this System (e.g. risk management). All of the above, create an environment of accountability, mutual trust and respect for the rules that correspond to our philosophy, values and commitments.

Environment	Risk assessment	Control Activities	Information and Communication (Reporting included)	Monitoring
<p>The Environment reflects the attitude and actions of the Board and management regarding the significance of control within the organization. It sets the tone of an organization, influencing the control consciousness of its personnel. Moreover, it provides the discipline and structure for the achievement of the primary objectives of the system of Internal Audit.</p>	<p>Risk Assessment identifies and analyzes external or internal risks affecting achievement of the objectives at the activity and the entity level. The assessment provides a foundation for managing change in the economy, the industry and regulatory environments and other operating conditions.</p>	<p>Control activities are the policies and procedures applied to ensure that management directives are carried out and actions are taken to address risks affecting achievement of objectives. Control activities occur throughout the organization, at all levels and in all functions.</p>	<p>An information system is the set of activities, involving people, processes, data and/or technology, which enable the organization to obtain, generate, use, and communicate transactions and information to maintain accountability and measure and review the entity's performance or progress toward achievement of objectives. The Information system processes data from both internal and external sources to support the function of internal control.</p>	<p>Monitoring includes ongoing evaluations, separate evaluations, or combination of the two that are used to ascertain whether each of the five components of internal audit is present and functioning.</p>
<p>Culture</p> <ul style="list-style-type: none"> Well defined desired culture using culture dimensions analysis <p>Governance rules</p> <ul style="list-style-type: none"> Articles of association BoD committee Authorization chart <p>Management leadership and personnel climate</p> <p>Organisation structure</p> <ul style="list-style-type: none"> Clear Business Model Process model Organization chart with single reporting line Risk based and balanced delegation of power Job grading Workforce planning <p>High Performing HR system (Employee engagement)</p> <ul style="list-style-type: none"> Code of ethics Performance management Reward system Career planning Continuous improvement of the HR system Succession plan Talent Management and development plan Continuous training Recruitment system <p>Infrastructure</p> <ul style="list-style-type: none"> Modern assets and High level of technology in BU High level automatio Modern workplace and Good housekeeping Physical Security 	<p>Risk identification</p> <ul style="list-style-type: none"> Threads in SWOT analysis Internal questionnaires (Workshops) Risk reporting by processors <p>Risk evaluation</p> <ul style="list-style-type: none"> Likelihood and potential impact Quantification, Inherent and residual value at risk <p>Risk response</p> <ul style="list-style-type: none"> Avoidance Reduction Sharing Acceptance <p>Risk monitoring</p>	<p>The control activities are organized in systems. All systems are integrated in the same context (framework) by working holistically Each system includes</p> <ol style="list-style-type: none"> Policy which defines: <ul style="list-style-type: none"> (a) purpose and objectives (b) Scope (c) requirements Activities mapping covering all requirements Accountability matrix Procedures (Preventive, detective, corrective and directive) Performance review and detective control activities <ul style="list-style-type: none"> (a) Measurement using a well structured and defined KPIs system (b) Verification of system Corrective control activities <ul style="list-style-type: none"> (a) Feedback mechanism (b) Corrective mechanism <p>Quality Assurance</p> <ul style="list-style-type: none"> (a) Quality Assurance Plan (b) Quality Assurance Control 	<p>Information system which:</p> <ul style="list-style-type: none"> identifies the info required to support the Internal Audit identifies the info for the achievement of the objectives captures internal and external sources of data processes and transform relevant data into info maintains quality of data throughout processing considers cost of benefits processes info used in designing, implementing or conducting the I C processes info used in assessing the effectiveness of the Internal Audit uses the technology to create new revenue strems and support decision making (Digitalization) <p>Communication is the continual and iterative process of providing, sharing and obtaining necessary information</p> <p>Communication system which:</p> <ul style="list-style-type: none"> Communicates internal or external info Communicates to external parties (shareholders, partners, owners, regulators, customers, financial analysts) Communicates with BoD Selects the method of communication Provides separate communication lines such as whistle-blower hotlines Enables inbound communication from customers, suppliers, external auditors, regulators etc Communicates the objectives Communicates the responsibilities of the Internal Audit Communicates the Internal Audit deficiencies and corrective actions 	<ul style="list-style-type: none"> Evaluation of IC system Identify IC Deficiencies and lack of effectiveness Propose corrective actions Identify ability to override Internal Audit <p>Through the following mechanisms:</p> <ul style="list-style-type: none"> (a) Ongoing monitoring implemented by inline management through a KPI tree (b) Self assessment of processing (c) Internal Auditing (d) External quality assesment review of the auditing every 5 years <p>Formal evaluations by internal auditors</p> <ul style="list-style-type: none"> Annual audit plan Follow up on corrective action activities Investigation of reported issues Reporting <ul style="list-style-type: none"> Finding issues Recommendations Timeframe Response from management Process owner Progress monitoring

The Risk and Internal Control Department is responsible for the maintenance of the System, and at the same time acts as a second line of defense in controlling its implementation. System maintenance includes:

- Ensuring the timely notification and dissemination of the provisions of the Internal Control system
- Revision of the System and its renewal on a regular basis, in order to keep pace with any changes both

in the expectations of those who apply it, as well as changes related to environmental and regulatory provisions

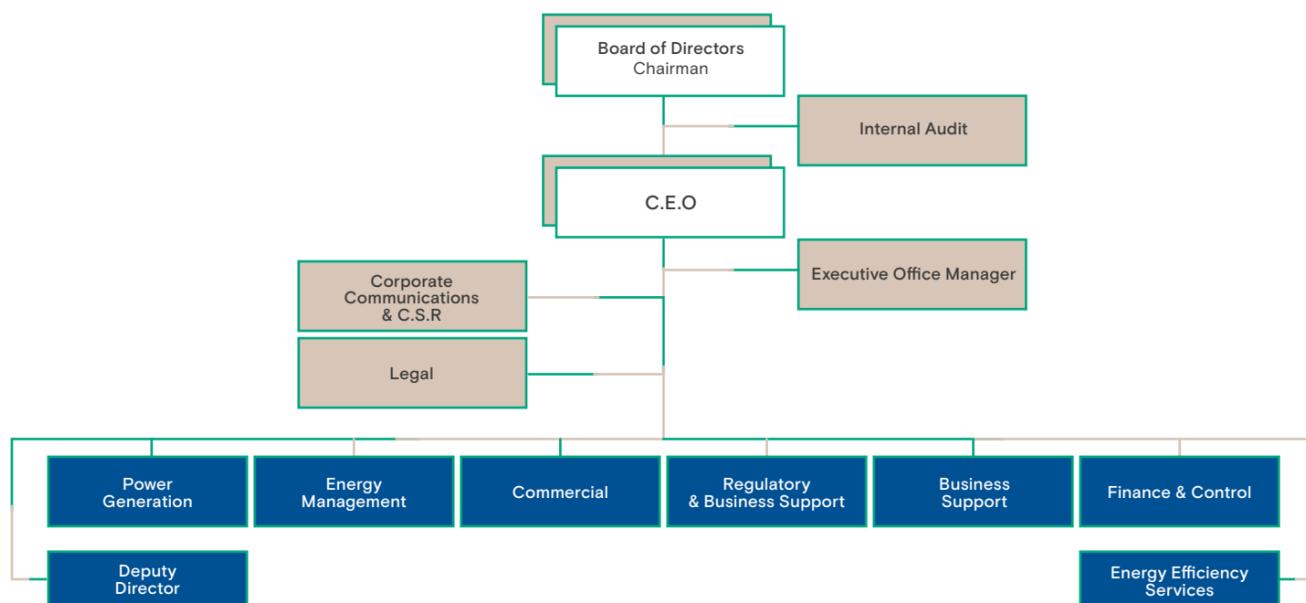
- Adoption of appropriate precautionary measures to detect any breaches of the System
- Monitoring the implementation of the System on a regular basis

Board of Directors and Organizational Structure

The Board of Directors, based on the ELPEDISON's provisions of the articles of association, has the authority to decide on all matters concerning its management and representation, the management of corporate assets and, in general, the pursuit of its purpose. The Board of Directors decides on all matters generally concerning ELPEDISON within the framework of the corporate purpose, with the exception of those, which according to the law or these articles of association, belong to the exclusive competence of the General Meeting.

ELPEDISON is managed by the Board of Directors,

consisting of eight (8) members. The Board bears the responsibility of the Management of the corporate property, its representation, and the formulation of a strategic direction, seeking the strengthening of its economic value and efficiency, as well as the protection of corporate interest. The Board of Directors is elected by the General Assembly for a three-year term and establishes rules that define the fundamental principles for the internal structure, management and collaborations of the Group. The sessions of the Board in Greece are held at least once every calendar quarter, as well as exceptionally if deemed necessary for immediate decision-making.



Members of the Board of Directors

- Andrea Testi – Chairman
- Ioannis Zisimos – Deputy Chairman
- Nikolaos Zachariadis – CEO

- Christian Thomas – Member
- Spyros Kiartzis – Member
- Theodora Papadimitriou – Member
- Fabio Catalano – Member (Replaced Mr. Roberto Cozzi on 08.03.2021)
- Marco Adriano Landoni – Member

Internal Audit

The Internal Audit Department at ELPEDISON is an independent entity, designed to add value and improve the company's operations. It assists in achieving the company's goals by systematically evaluating the effectiveness of the internal control system, risk management and corporate governance processes. The Internal Audit Department periodically informs the Internal Audit Committee consisting of members of the Board of Directors and through this process, the Board of Directors is informed about the evaluation of the overall efficiency and effectiveness of the company's

processes and operations. It proposes improvements / changes and additions to procedures and policies, when necessary, and monitors their implementation. Internal auditors perform their duties in accordance with the Standards for the Professional Practice of Internal Auditing, as well as with the policies and procedures of the company. The Internal Audit Department has full access to all the data and activities of ELPEDISON that are necessary for the implementation of the audit project.

Our performance

[GRI 103-3, GRI 205-3]

	2019	2020	2021
Total number of confirmed incidents of corruption	0	0	0
Total number of confirmed incidents in which employees were dismissed or disciplined for corruption	0	0	0
Total number of confirmed incidents when contracts with partners/suppliers were terminated or not renewed due to violations related to corruption	0	0	0
Public legal cases regarding corruption brought against ELPEDISON or its employees.	0	0	0

3.2 Ensuring emergency preparedness



[GRI 102-11, GRI 103-2]



Our approach

In an ever-changing world with unpredictable conditions, we are called upon to manage and assess a range of business and operational risks that may affect our reputation, resilience and broader growth prospects.

The high degree of preparedness and the immediate response of ELPEDISON to emergencies ensures the continuity of our business operation. At the same time, the rapid return to normal operation in case of emergencies, effectively reduces the potential impact on the environment, employees and

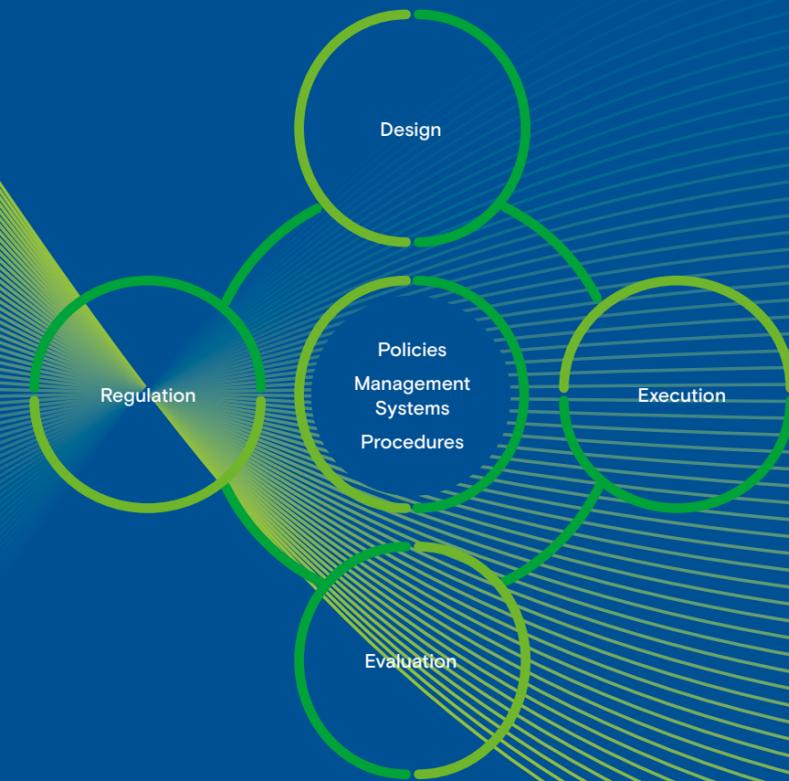
the local community, while protecting it from negative impacts on its reputation and financial performance.

ELPEDISON's approach to dealing with emergencies contributes to its sustainable development, through the implementation and promotion of integrated policies and plans aimed at the effective management of emergencies at all levels related to the protection of the natural environment and workers, but also the social prosperity at local and national level.

Risk assessment

Based on the annual report we publish on the smooth operation of our production units, we identify the risks and their impacts, while enhancing the ability to respond effectively to emergencies. Our goal is to deal with risks effectively and to prepare appropriately, to improve recovery times and to maintain our

critical productive functions during a major crisis. Our risk management plan is based on the Policies we have developed, the Management Systems and the procedures we have designed, while it is structured according to the design-execution-evaluation-regulation cycle.



At ELPEDISON we have identified the following areas through which risks may arise that impact all of our business activities:

- Employee health and safety incidents
- Incidents that cause environmental impact
- Natural disasters, acts of terrorism and other malicious acts
- Insufficient physical security

Risk and emergency management

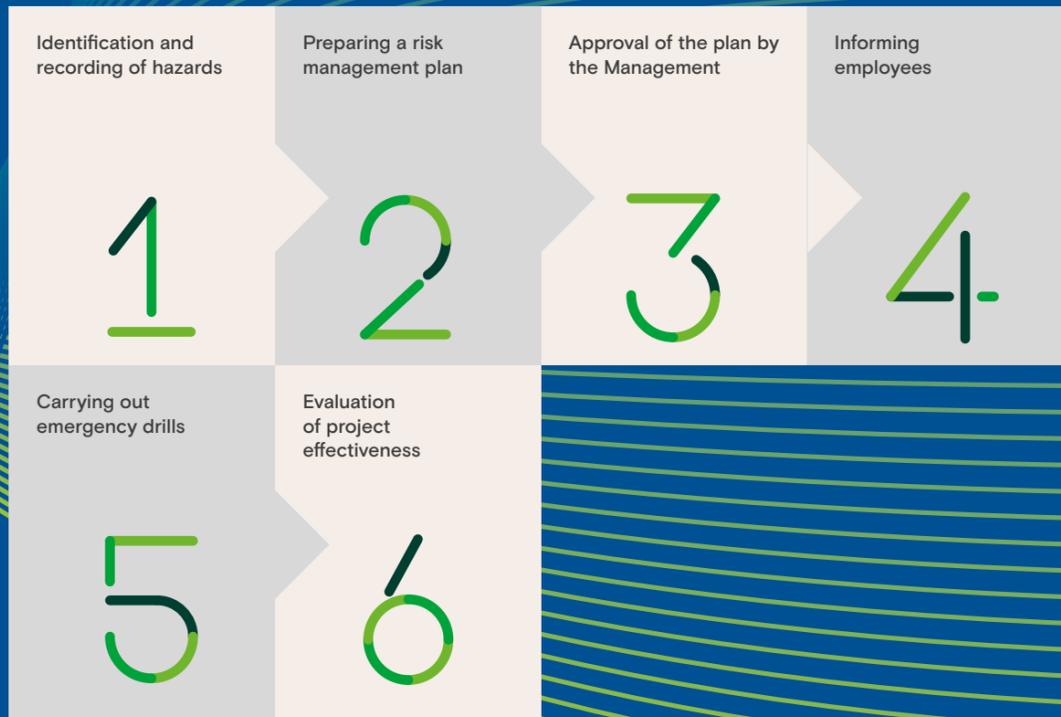
Employee health and safety incidents

The safety officer of each production unit, in collaboration with the employees, is responsible for the management of incidents in the health and safety field. Specifically, meetings are held daily where issues arising from the previous day are analyzed and recorded in the daily unit report. In addition, health and safety systems are evaluated every month to ensure that procedures and protection measures are implemented, as much as possible.

According to the operation report of our production units, the following health and safety risks are identified and evaluated:

- Fire
- Explosion
- Accident with a vehicle
- Serious injury while operating machinery

The procedure for preparing for emergencies is listed in the report and includes the following steps:



Incidents that cause environmental impact

Our company, in the context of ensuring the protection of the environment in the areas where it operates, issues a report according to which the operation of the production units is controlled. This report includes the activities to be carried out in the context of current and future work and shows how structural actions should be studied and implemented in emergencies.



Insufficient physical security

Studies on exposure to earthquakes and floods have been carried out according to Environmental Impact Assessment Reports. Based on the results, the corresponding protection actions of the units were designed. Every factory has a record of earthquake activity so that it can stop its production in time and with maximum safety for the equipment, the environment and the safety of working residents.

Earthquake emergency preparedness drills, heavy snowfall and high ambient temperature are performed regularly. Plants also have procedures to protect equipment from very high or very low temperatures. These procedures are applied during the summer and winter respectively.

In addition, our company, in the context of ensuring our smooth operation and protection of workers from the COVID-19 pandemic, in accordance with the guidelines and recommendations of the World Health Organization and the Ministries of Health and Climate Crisis & Civil Protection, essential measures were implemented from the first instance of the pandemic, the implementation of which is evaluated on a systematic basis. In this way, we continued our business activities, supporting our customers as much as possible.

Our performance

[GRI 103-3, ELPEDISON indicator]

The management of emergency events is a top priority for our company, and this is reflected in our performance. In particular, during 2021, no serious incidents were confirmed that affected the health and safety of workers, while no significant environmental impact incidents or terrorist incidents were reported.



workplace accidents



environmental events



emergency drills



Natural Disasters

As part of the monitoring and assessment of risks related to natural disasters, we conducted a vulnerability study in the production units of Thisvi and Thessaloniki, but also in the headquarters, in order to identify potential threats and take corrective action. Specifically, during the assessment, a specific methodology was followed, according to which:

- Recording and assessment of the existing security situation
- Analysis of each operational space and infrastructure of the installation
- Separation of areas into Safety Zones

Acts of terrorism and malicious acts

In collaboration with the Center for Security Studies (KEMEA), vulnerability studies of our facilities have been carried out. An action plan has been created and related actions are being carried out in facilities and trainings to optimize the company's exposure to acts of terrorism and malicious acts.

Appendices

[GRI 102-45, GRI 102-48, GRI 102-49, GRI 102-50, GRI 102-51, GRI 102-52, GRI 102-53, GRI 102-54, GRI 102-56]

About the Sustainability Report

This Report is the 1st Sustainability Report of ELPEDISON based on the Global Reporting Initiative (GRI) Standards, which includes our approach and performance in relation to the material Sustainable Development topics we have identified, in order to inform our stakeholders about our economic, social and environmental impacts.

The Report concerns the financial year 2021 (1.1.2021 - 31.12.2021) and was prepared in collaboration with the Department of Climate Change and Sustainable Development of EY Greece * according to the GRI Standards: Core Selection (This report has been prepared in accordance with the GRI Standards: Core option). Where appropriate, the Report includes internal performance indicators and its content is in line with the UN Sustainable Development Goals (SDGs).

In this Report, the term "company" refers to the company ELPEDISON S.A.

More information on the content and company's Sustainable Development topics materiality analysis is available on the 26-33 pages. The GRI content index is available on the 89-94 pages.

ELPEDISON has not received external assurance on the content of the report. We recognize the importance of the process to our stakeholders and are considering obtaining external assurance for our next reports.

For any report on the initiatives we take in the field of sustainable development, as well as for questions regarding this Report and its content, you can contact Mr. Akis Stamoulis at d.stamoulis@elpedison.gr.

*The present report was prepared with the consulting support of the Climate Change and Sustainability Services Practice of ERNST & YOUNG (HELLAS) CERTIFIED AUDITORS-ACCOUNTANTS SA ("EY"). ELPEDISON is responsible for the calculation, collection and consolidation of quantitative data as well as for the accuracy and completeness of the quantitative and qualitative data included in this report. EY shall not bear any responsibility or liability against any third party for the contents of this report.

GRI Content Index

[GRI 102-55]

GRI Standard	Disclosures	Page/Reference	Omissions
GENERAL DISCLOSURES ("Core" option)			
GRI 102: General Standard Disclosures 2016	102-1 Name of the organization	14	—
	102-2 Activities, brands, products, and services	14	—
	102-3 Location of headquarters	14	—
	102-4 Location of operations	14	—
	102-5 Ownership and legal form	14	—
	102-6 Markets served	14	—
	102-7 Scale of the organization	18, 54	—
	102-8 Information on employees and other workers	18-19	—
	102-9 Supply chain	20	—
	102-10 Significant changes to the organization and its supply chain	6-7, 20	—
	102-11 Precautionary principle	36, 40, 84	—
	102-12 External initiatives	23	—
	102-13 Memberships of associations	23	—
	102-14 Statement from the senior decision-maker	6-7	—
102-16 Values, principles, standards, and norms of behavior	15	—	
102-18 Governance structure	82	—	
102-40 List of stakeholder groups	27	—	

GRI 102: General Standard Disclosures 2016	102-41 Collective bargaining agreements	There are no collective bargaining agreements	—
	102-42 Identifying and selecting stakeholders		26
	102-43 Approach to stakeholder engagement		26
	102-44 Key topics and concerns raised		27
	102-45 Entities included in the consolidated financial statements		88
	102-46 Defining report content and topic Boundaries		28-33
	102-47 List of material topics		30
	102-48 Restatements of information	It is the 1st Sustainability Report of the company and due to that, there are no restatements.	—
	102-49 Changes in reporting	It is the 1st Sustainability Report of the company.	—
	102-50 Reporting period		88
	102-51 Date of most recent report	It is the 1st Sustainability Report of the company.	—
	102-52 Reporting cycle		88
	102-53 Contact point for questions regarding the report		88
	102-54 Claims of reporting in accordance with the GRI standards		88
	102-55 GRI content index		89
	102-56 External assurance		88

MATERIAL TOPICS			
Reducing GHG emissions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	36-38	—
	103-3 Evaluation of the management approach	39	—
GRI 302: Energy 2016	302-1 Energy consumption within the organization	39	—
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	39	—
Safeguarding biodiversity			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	40-43	—
	103-3 Evaluation of the management approach	43	—
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to protected areas and areas of high biodiversity value outside protected areas	43	—
	304-2 Significant impacts of activities, products, and services on biodiversity	43	—
Providing solutions that reduce the environmental impact of our customers			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	44-48	—
	103-3 Evaluation of the management approach	48	—
ELPEDISON Indicator	Estimated energy reduction from energy efficiency services	48	—

Generating and distributing direct and indirect economic value			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	52-54	—
	103-3 Evaluation of the management approach	54	—
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	54-55	—

Providing solutions that ensure access to affordable energy			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	56-57	—
	103-3 Evaluation of the management approach	58	—
ELPEDISON Indicator	Number of electricity meters per customer category	58	—

Ensuring the health, safety and well-being of employees			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	59-64	—
	103-3 Evaluation of the management approach	66-67	—

GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	60	—
	403-2 Hazard identification, risk assessment, and incident investigation	63	—
	403-3 Occupational health services	60	—
	403-4 Worker participation, consultation, and communication on occupational health and safety	61	—
	403-5 Worker training on occupational health and safety	61	—
	403-6 Promotion of worker health	63	—
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	63	—
	403-8 Workers covered by an occupational health and safety management system	59-60	—
	403-9 Work-related injuries	66-67	—

Ensuring corporate governance, regulatory compliance and business ethics			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	76-83	—
	103-3 Evaluation of the management approach	83	—
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and actions taken	83	—

Ensuring emergency preparedness			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	33	—
	103-2 The management approach and its components	84-87	—
	103-3 Evaluation of the management approach	87	—
ELPEDISON Indicators	Number of accidents Number of environmental events Emergency drills	87	—

elpedison
Next to you with all our energy