



HUMAN RIGHTS POLICY

HEDNO S.A.

HEDNO's BoD Decision 43/19.12.2024

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One power
system for all

Policy's Timeline

- **Initial Drafting of the policy** : Compliance Department (ComD) on December 2024
- **Adoption of the Policy** : HEDNO's BoD Decision 43/19.12.2024
- **Date of Adoption- entry into force of the Policy** :
- **Revisions of the Policy** :

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1. INTRODUCTION

The Hellenic Electricity Distribution Network Operator (hereinafter, "HEDNO" or "HEDNO S.A.", or the "Company") is undeniably an innovative company, a creator of jobs and a climate of prosperity, a leader in business practice and excellence. And as such, it puts emphasis on, as one of its key priorities, the respect for human rights, the respect for its employees, and the respect for all stakeholders in the conduct of its business.

The Company seeks to protect and promote respect for the personality and human rights within its sphere of influence. It supports and promotes best practices for human rights, security and protection of interested parties.

2. PURPOSE OF THE POLICY

This Policy establishes a framework for promoting respect for and protection of Human Rights, both within the Company and within its sphere of influence.

This Policy expresses HEDNO's intention to have zero tolerance for the violation of Human Rights, by avoiding both the relevant violations by persons falling within the scope of this Policy, as well as transactions with third parties that may have caused demonstrably, on the basis of at least a court decision of first instance, violations of such rights.

In addition, the purpose of this Policy is to increase the awareness of employees and all stakeholders, within the Company's sphere of influence, regarding the respect and protection of Human Rights, in all areas of HEDNO's activities.

3. SOURCES OF HUMAN RIGHTS PROTECTION

In drafting this Policy, the following internationally recognized Standards, Regulations, Principles and Guidelines have been especially taken into account:

1. The United Nations Universal Declaration of Human Rights
2. The United Nations Guiding Principles on Business and Human Rights (The UN Guiding Principles on Business and Human Rights).

3. The UN Global Compact Principles (UN Global Compact)
4. The OECD Guidelines for Multinational Enterprises (OECD Guidelines for Multinational Enterprises)
5. The Declaration on Fundamental Principles and Rights at Work and the fundamental Conventions of the International Labour Organisation (ILO)
6. The Sustainable Development Goals (SDGs) of HE and the 2030 Agenda for Sustainable Development
7. The UN International Human Rights Conventions
8. The EU Charter of Fundamental Rights and the EU acquis in the field of human rights protection
9. The European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR)
10. The European Social Charter
11. The United Nations Convention on the Elimination of All Forms of Discrimination against Women

4. FIELD OF APPLICATION

This Policy is binding on :

- (i) the Members of the Board of Directors of the Company.
- (ii) The senior management and directors of the Company even if they are not members of the Board of Directors.
- (iii) Officers of the Company irrespective of their level and the manner and procedure of their recruitment, expressly including all Special Officers and Special Advisors of the Company; and
- (iv) employees under contract of employment, service providers under contracts of paid or unpaid assignment, project, independent service and temporary employment, interns, apprentices and volunteers, and those employed through third party service providers.

HEDNO ensures that it cooperates with suppliers and other third parties (e.g. contractors, subcontractors) that adopt and implement policies similar to this one in their businesses.

5. RESPECT FOR HUMAN RIGHTS

Within the framework of the exercise of its competences and its scope of action, HEDNO SA acts proactively and ensures the protection, respect and observance of human rights.

At the same time, it shall ensure that restoration and redress mechanisms are put in place in the event that it becomes aware of any violation of the Principles of this Policy and which is causally attributable to HEDNO's fault.

5.1 . Health and safety at work

Health and safety at work are supreme goods and their protection is directly linked to the protection of human dignity and its inviolability. The Company supports, adopts and encourages a corporate culture that aims to promote health and safety at work as a core value, while having and implementing an Health and Safety Policy at Work, the scope of which includes all those employed in the Company's projects and activities and third parties generally related to the Company.

It provides and maintains the required health and safety conditions in the workplace for all its personnel in accordance with applicable labor health and safety laws, minimizing the risks of accident or injury.

Employees receive appropriate and systematic information on labor health and safety issues, are provided with the appropriate Personal Protective Equipment and have received appropriate safe working instructions for the work in which they are employed.

5.2 Suitable working conditions

HEDNO remunerates its staff in accordance with the applicable legislation, regulations and operational collective agreements, while the way in which the

remuneration is determined is based on objective criteria. For overtime work, the statutory remuneration shall be paid.

Furthermore, the company ensures that employees are paid on time and on a regular periodic monthly basis and have access to monthly payroll.

In addition, employees are granted all leaves provided for by labor legislation, irrespective of their employment relationship with the company, obviously to the extent that such leaves and the relevant entitlement are provided for in the legal framework in force at any given time, in particular in the framework of labor legislation.

5.3 Freedom of association and collective bargaining

HEDNO complies with the requirements of the legislation on the right of association and collective negotiations/bargaining. It ensures that employees participating in legally recognized trade unions do not face intimidation or harassment.

In addition, it maintains open communication and promotes constructive dialogue with the legally elected employees' representatives, in mutual respect and always acting in good faith, protecting the rights of employees while promoting the interests of the company.

5.4 Prohibition of discrimination/violence and harassment at work

HEDNO fully respects diversity and the right to equal opportunities and does not tolerate any form of discrimination.

It provides equal opportunities in the recruitment, as well as the development, education, training, remuneration and performance appraisal of its employees. It shall not tolerate discrimination on the basis of race, sex, colour nationality or ethnic origin, class, religion, age, disability, marital status, sexual orientation or gender identity, political and cultural beliefs or any other status protected by applicable law.

The Company does not accept any form of physical, verbal, sexual or psychological harassment or violence, as well as threats and intimidation at work, and the Company's "Policy against Violence and Harassment at Work" approved by the Board of Directors of the Company and the "Sanctions and Management of Reports and Complaints Policy of the Company"

5.5 Child Labor

HEDNO fully observes all laws concerning the provision and observance of minimum age limits in the recruitment of its employees and contributes in every possible way and means to promote the efforts to eliminate child labor.

5.6 Slavery, forced labor and human trafficking

HEDNO prohibits the use of any form of forced, compulsory or bonded labor or human trafficking and demonstrates zero tolerance to incidents and conditions that may lead to and/or promote any form of Modern Slavery.

5.7 Protection of Personal Data

HEDNO takes all appropriate measures to ensure the confidentiality, security and protection of personal data of employees and persons dealing with the company and to prevent their alteration, damage, loss, destruction, as well as access to them by third parties who, according to the applicable legislation on the protection of personal data, do not have such a right of access. As for the specific issues of personal data protection and management of such matters, specific policies - instructions of the company addressing the aforementioned specific issues are applicable.

In addition, the Company ensures the effective exercise of the rights of the aforementioned, in relation to the processing of their personal data, in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 (GDPR) and the relevant specific policies - instructions of the company on these topics.

5.8 Fight against corruption

HEDNO operates against corruption in all its forms. It prohibits and does not tolerate any form of corruption, bribery or extortion and proactively ensures the development of procedures and practices to combat and counter corruption, bribery, etc. As for corruption and bribery issues and its relevant issues along with the framework to manage such cases, HEDNO's "Policy against corruption and bribery" is applicable.

5.9 Environmental protection

HEDNO supports and adopts a proactive approach to environmental challenges. It undertakes on a regular basis initiatives to promote environmental responsibility more broadly and encourages the development and dissemination of environmentally friendly technologies aimed at achieving the energy-green transition.

It is underlined that HEDNO's environmental strategy has been aligned with the ambitious medium and long-term climate neutrality targets of the European Union and the State for 2050. To this end, in addition to the implementation of EU and national environmental legislation, HEDNO is taking additional initiatives and preventive measures aimed at reducing the environmental footprint of all its activities and facilities, as specified in particular in the context of the company's strategic planning and in the Company's Environmental Policy.

5.10 Rights of Local Communities

HEDNO recognizes the importance of the partnership/relationship and its influence upon the local communities, in which it operates, over the decades.

As such, it respects, cooperates, communicates, consults and formulates, as far as possible and feasible, in collaboration with local communities, actions, investments and decisions that may have an impact on the rights, quality of life and economic development and progress of those communities.

5.11 Disciplinary practices-suppressive measures

HEDNO's disciplinary regulations and procedures shall be applied to its staff, if deemed necessary and as a tool in order to prevent unacceptable behavior and must be in accordance with the labor legislation and the Company's relevant regulations.

HEDNO shall ensure that these practices are applied consistently and fairly to all staff, and personal characteristics such as gender, national origin, religion, etc. shall not affect the outcome of the investigation of potential misconduct or the severity

of any potential penalty. In cases where it is deemed necessary to apply disciplinary procedures and/or measures, the Company is committed to ensure that employees have access to the details of the misconduct attributed to them, have the possibility to appeal against disciplinary decisions without any negative consequences for them, may, within the framework and limits allowed by the relevant disciplinary regulations of the Company, be represented and assisted by a lawyer in the relevant disciplinary proceedings and, in general, that all rights of the employee are respected.

In addition, the Company encourages employees and all interested third parties to report any findings of misconduct in order to further investigate them and take appropriate measures to restore legality. In this context, the Company's "Sanctions Policy & Report/Complaint Management Procedure" is applicable.

5.12 Corporate Social Responsibility

HEDNO always operates responsibly and with absolute transparency throughout its activities . Its actions and the way it conducts its business practices include responsibility for the environment, implementation of best labor practices and care in the way it interacts with all interested parties (customers, employees, shareholders, suppliers, local communities, etc.). It operates in a balancing manner, for the benefit of society and the Company, while its actions and objectives incorporate to the maximum extent possible the criteria E (Environment), S (Society) and G (Governance) in its operation and in all its business decisions.

It recognizes the important multiplier role of social capital (social capital builds trust and cooperation), invests and offers incentives for its development and maximization.

It is also noted that HEDNO ensures its alignment with the new philosophy of corporate responsibility within the framework of CSV (Creating Shared Value). Through CSV, the company aims to achieve profit and financial robustness while creating added value for the society and the environment. At the same time, the company is constantly adapting its business practices in this direction with the aim of creating long-term value that is shared with all interested parties but also sets the conditions for sustainability and viability for future generations.

6. ACTIONS AND PROCEDURES FOR THE IMPLEMENTATION OF THE POLICY – TRAINING AND AWARENESS RAISING

6.1 General provisions

The Company shall train and provide information related to human rights issues to all its personnel.

With specific reference to staff training, the Compliance Department (CD) shall ensure, with the assistance, where necessary, in particular of the LODD (Learning & Organizational Development Department) that the following are initiated:

- 1) Providing relevant information, including the publication of this Policy, through the intranet, internal seminars and other training - educational activities.
- 2) Provision of a specialized E-Learning training program, entitled "Human Rights at HEDNO" to all employees and executives.
- 3) Assist where required the persons who fall within the scope of this Policy regarding the observance of human rights and the regulations of this Policy in the workplace. To this end, it shall ensure a special communication channel for this purpose.
- 4) Inclusion of human rights issues in the integration programs for young workers, in cooperation with HRMD (Human Resources Management Department).

6.2 Detailed distribution of responsibilities using the RACI table

The RACI (Responsible, Accountable, Consulted, Informed) table is a powerful tool for defining and clarifying roles and responsibilities related to environmental management activities. By assigning specific roles to jobs/teams, the RACI table ensures that every aspect of environmental policy is effectively managed.

This structured approach ensures that responsibilities are clear, preventing duplication and gaps in policy execution. The RACI table should be reviewed and updated regularly to reflect any changes in the Company or its operations in real time.

This structured approach ensures that responsibilities are clear, preventing duplication and gaps in policy delivery. The RACI matrix should be reviewed at least

every two years or at any time such a review is deemed necessary in order to reflect properly any changes in the Company or its operations in real time. The relevant proposal for review will be conducted by the Compliance Department, , in collaboration with other HEDNO's Departments, when needed.

The roles in the context of this policy are presented on the following RACI matrix.

Roles - Task/Activity	CEO/GM	ComD	HRMD	OHSCD	OHSDD	L/D	LODD
Review of the Policy	A	R	C	C	C	C	I
Implementation of the Policy	I	A&R	C	C	C	I	I
Evaluation & Monitoring Policy	I	A&R	C	C	C	I	I
Training and Awareness Raising	I	A&R	I	I	I	I	C

R:RESPONSIBLE	A:ACCOUNTABLE	C:CONSULTED	I:INFORMED
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Definitions

Responsible: The person / function that does the given task. There is one person responsible although others can be delegated to assist in the work required.

Accountable: The person / function that is ultimately answerable for the oversight of the task and must sign-off on the work that "responsible provides.

Consulted: The person / function whose opinion is sought prior or during a task, decision or action is made. Typically, a SME with whom there is a two-way communication.

Informed: The person / function that is kept up-to-date on progress, often only on completion of the task, and with whom there is just one-way communication.

7. VIOLATIONS OF THE POLICY

Violation of this Policy will not be tolerated and may lead to the imposition of sanctions under the applicable regulatory and legislative framework.

The Sanctions Policy & Complaints Management Policy & Procedure of the HEDNO is applicable for reporting issues in cases of alleged violation of the provisions of this Policy.

8. OBLIGATIONS

It is the responsibility of each supervisor to adhere to this Policy in his/her area of functional responsibility, to set an example (tone from the top) and to provide guidance to employees under his/her authority.

All persons falling within the scope of this Policy must comply with the principles and rules/dispositions set out in this Policy.

9. MONITORING, REVIEW AND EVALUATION OF THE POLICY IMPLEMENTATION

The Compliance Department (ComD), with the assistance of, in particular, the HRMD (Human Resources Management Department), the OHSCD (Occupational Health & Safety Compliance Department) and the OHSD (Occupational Health & Safety Development Department), where appropriate, is responsible for ensuring that this Policy remains updated.

Specifically, this Policy shall be reviewed at least every two (2) years, or periodically if needed. Any updates, additions, and/or amendments to this Policy shall be approved by the General Managers of Legal Affairs & Corporate Governance and Human Resources & Organization acting jointly.

This Policy has been approved by the Board of Directors of the HEDNO by its Decision of 43/19.12.2024 and is effective as of this date.