



Occupational Health & Safety Policy
(hereinafter OHS Policy)
HEDNO S.A

HEDNO's BoD Decision 45/19.12.2024

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system for all

Policy's Timeline

- **Initial Drafting of the policy** : Compliance Department (ComD) and Occupational Health & Safety Development (OHSDD) Department on December 2024
- **Adoption of the Policy** : HEDNO's BoD Decision 45/19.12.2024
- **Date of Adoption- entry into force of the Policy** :
- **Revisions of the Policy** :

Contents

1. Purpose and implementation of the Policy
2. Basic Principles
3. Measures
4. Roles and responsibilities
 - 4.1 General provisions
 - 4.2 Detailed distribution of responsibilities using the RACI table
5. Guidelines and procedures
6. Training
7. Audit
8. Data reporting
9. Responsibilities
10. Implementation and review of the Policy

1. Purpose and Application of the Policy

Ensuring Occupational Health and Safety (hereinafter, OHS) is a basic and conscious strategic choice for HEDNO, which covers and exceeds the obligations dictated by National and International legislation. The Company respects the fundamental right of every employee to a healthy and safe working environment and recognizes its responsibility for the effective management of OHS risks in the workplace, placing OHS at the heart of its business decisions. In this context, aiming for "zero accidents" for HEDNO's employees, its partners and all third-party stakeholders is a top priority for the Company.

With the OHS Policy, HEDNO clarifies the objective, the principles and the measures adopt and to be adopted in order to realize its corporate obligations, recognizing the responsibility it bears as an employer regarding the implementation of measures to protect the health and safety of persons who fall within the scope of this Policy, its facilities as well as the working environment. It also clarifies the obligations of workers as set out in the relevant legal framework.

The implementation of the OHS Policy is the basic framework for improving the Company's performance in the field of OHS and consequently for achieving full compliance with the Company's legal obligations in the said field, along with the appropriate adaptation of the Company's operating framework based on best practices related to the scope of this Policy.

The purpose of this Policy is to integrate OHS as a major parameter in the whole range of HEDNO's activities and to formulate a strong corporate culture on OHS issues, in order to systematically identify and assess relevant risks at work, as well as to prevent and minimize OHS incidents.

In addition to the above, HEDNO, recognizing the particular, among others, social dimensions of accidents, adopts the present OHS Policy aiming mainly at the following:

- **Eliminate accidents, injuries and occupational diseases, or damage to the Company's equipment and facilities**, by performing all work – adopting all measures as for the required level of safety and quality.
- **Minimize OHS incidents** through risk control and zero tolerance for failure to report incidents.

- Continuous **control and monitoring** for the identification and assessment of potential risks about OHS arising in the context of HEDNO's activities and **immediate implementation** of appropriate preventive systems and protective measures in order to effectively reduce the risk and minimize the impact of the identified risks.
- **Minimize the impact** of identified risks on people, on the environment and for facilities.
- **Continuous improvement of the OHS culture** of HEDNO's employees, its partners and all third-party stakeholders in the said field. .

By fulfilling the above objectives, HEDNO aims to eliminate, as far as reasonably practicable, any potential risk and/or risky situation that may cause damage to human health, the environment and its assets.

The OHS Policy is binding for all employees of the Company (irrespective of their contractual relationship with HEDNO) and particularly for the members of the Management, the highest management bodies of the Company, irrespective of whether they are members of HEDNO's BoD, all HEDNO's executives, irrespective of their level and the way they are recruited, the employees with dependent employment contracts (fixed-term and indefinite), the service providers with paid or unpaid mandate, project contract, independent services and temporary employment contracts, trainees, apprentices and volunteers, those employed through third party service providers, as well as the staff of suppliers, contractors, subcontractors and service providers to HEDNO, regarding OHS objectives, principles and measures.

2. Basic Principles

The basic principles that govern all procedures and practices applied by HEDNO regarding OHS are the following requirements:

- The fulfilment of legal and other OHS requirements applicable to the Company's activities.
- The mandatory compliance with the defined "Life Saving Rules (hereinafter, LSRs)" as a prerequisite for cooperation, without accepting any form of violation of these rules.

The following are defined as Life Saving Rules (LSRs) in the HEDNO:

PRE-TASK RISK ASSESSMENT: Assess any potential risks at the workplace

WORK PERMIT: Never perform a task if not authorized to do so

ENERGY ISOLATION: Always respect the rule "Isolate - Test - Ground

WORK AT HEIGHT: Be properly anchored whenever there is risk of fall from height

MOBILE EQUIPMENT: Keep mobile equipment at a safe distance from live lines

LOAD LIFTING: Stay outside the fall zone

EXCAVATION WORK: Fence off excavations or openings in the ground

WORK IN CONFINED SPACES: Ensure safe entry to, conditions and exit from a confined space

ROAD SAFETY: Drive consciously

PPE: Wear the appropriate PPEs and use the necessary CPEs

- To provide and maintain a healthy and safe working environment for employees and all those affected by the Company's activities and operations (customers, visitors, suppliers, contractors, partners, neighboring facilities, environment, etc.).
- The cessation of work performed by any employee in the event of life-threatening conditions and/or situations or the detection of deviations from the existing "Life-Saving Rules" until full remediation and correction of such conditions has occurred.

In particular, any employee must stop performing a job if:

- Finds that any person, including colleagues, other staff and third parties, are in danger because of an unsafe situation or because of the adoption of an unsafe work practice or method.

- There is a possibility of environmental damage.

- The safety of the operation of an installation is questioned and there is a possibility of serious damage or harm occurring, which endangers the health and safety of HEDNO's technical crew or workers of HEDNO's contractors or third parties.

- To establish a supportive environment in order to ensure the holistic well-being of employees, with the aim of promoting integrity, balance,

mental health, psychological well-being, personal development and productivity.

- To continuously inform, raise awareness and educate its employees on OHS issues through face-to-face meetings, seminars and appropriate safe work instructions/procedures, based on and specifically as provided in Article 6 of this Policy, in order to foster a culture whereby all work-related injuries and illnesses can and should be prevented.
- The development of adequate OHS management frameworks that enable, on the one hand, the management of safety risks through the application of appropriate prevention and protection measures at different levels of risk control, and on the other hand, the search for opportunities to achieve OHS improvements.
- The continuous monitoring, documentation and evaluation of OHS and the regular review of this policy, based on and as provided for in Article 10 of this policy, with a view to the continuous improvement of the OHS management system and its results.
- The cultivation and development of accountability through consultation and participation of employees, as defined in the applicable legislation, as a fundamental prerequisite for the effectiveness of OHS Policy.
- The full compliance of HEDNO's contractors as well as all those who have access to the Company's facilities regarding OHS issues, with the applicable legal framework for OHS, as well as the relevant contractual terms of the Company. The Company's contractual terms and conditions regarding OHS issues are defined in terms of content and are drawn up by the General Management for Network Development and Management (GM/NDM) in cooperation with the General Management of Occupational Health and Safety - (GM/OHS) and the General Directorate for Legal Affairs and Corporate Governance.

3. Measures

The GM/OHS has the mission to design and implement safe working methods for the continuous improvement of the working environment and the safeguarding of the health of HEDNO's employees. Furthermore, HEDNO's Environmental Health and Committee (EHSEC) has the purpose - among others - to oversee the identification and to oversee the monitoring and the management of risks and opportunities related to OHS, the supervision of compliance with regulatory, statutory, legislative and institutional obligations regarding HWS, as well as the supervision of the Company's annual targets regarding OHS.

Indicative measures that are being implemented to prevent occupational/work risks and protect OHS are the following:

- Identification and assessment of occupational/work risks in each job/type of work and by phase of performance. Observance of the Occupational I Risk Assessment Study (ORAS), in compliance with the legislation in force, by all Service Units, as a basic tool for the management of OHS issues. . Formulation of risk-based measures to eliminate or minimize risks arising from or related to OHS issues.
- Systematic information and training of employees on risks at work, safe working methods and practices, emergency response and first aid instructions, and on the incident reporting procedure. Systematic information and training of the Company's executives on the occupational/work risks of the activities they supervise.
- Develop and issue instructions for safe working and protection from risks. Preparation of Emergency Response Plans for the protection of human resources and facilities, in cooperation with the relevant bodies. Conduct regular staff preparedness exercises in cooperation with the competent authorities.
- Reporting of unsafe situations and actions to provide instructions and initiate the necessary corrective actions.
- Conduct internal briefings on safe working methods for all work carried out by employees and HEDNO's contractors/associates.
- Carry out regular visits and relevant field inspections in order to discuss safety issues as extensively as possible and to raise awareness on OHS issues among employees and HEDNO's contractors/associates.
- Provision of the Company's personnel with the most appropriate personal and group protection equipment, depending on the nature of their work.

- Taking measures to protect the health and safety of employees in compliance with the applicable legislation, medical supervision of staff health and conducting Periodic Occupational Health Check-ups, while fully ensuring medical confidentiality and protection of personal data.
- Investigate all OHS incidents and root cause analysis, where required, in line with the Company's Corporate Incident Management Framework. Drawing conclusions, recording and communicating lessons learned, and taking the required preventive and corrective actions.
- Evaluate corporate performance, based on internationally established indicators, annual statistical analysis of personnel accidents and prepare an Annual Report to the Company's Management.
- Allocate the necessary resources for the effective implementation of this Policy.
- Cooperation with competent bodies, such as the Labor Inspectorate (LI), the Hellenic Institute of Occupational Health and Safety (HIOS), etc.

4. Roles and Responsibilities

4.1 General Provisions

The organizational responsibility for the monitoring and implementation of the OHS Policy is assigned to the Occupational Health & Safety Development Department (hereinafter, OHSDD).

The OHSDD, in collaboration with, when needed, the Occupational Health and Safety Compliance Directorate (hereinafter, OHSDD), the Compliance Department (hereinafter, ComD) and the Corporate Risk Management Unit (hereinafter, CRMU), is responsible for enhancing the collective knowledge of top and senior management and, more broadly, the understanding of all staff of the key principles about OHS and the awareness of the risks and opportunities related to OHS, mobilizing at its discretion the necessary resources for this purpose, including any external assistance (assistance from external consultants) that may be required.

4.2 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 Occupational Health & Safety Development Department (OHSDD), in collaboration with other HEDNO's Departments, including but not limited to the Compliance Department (ComD).

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

Roles Task/Activity	CEO/GM & EHS Committee	OHSDD	ComD	OHSCD	LD	LODD	Other Departments-Regions& Areas
Review of the Policy	A	R	C	C	C	I	I
Implementation of the Policy	I	A&R	C	I	C	I	I
Evaluation and Monitoring of the Policy	I	A&R	C	C	I	I	I
Education - Training	I	A&R	C	C	I	C	I

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.

5. Guidelines and Procedures

The Company's activities are supported by a wide range of guidelines and working procedures covering organizational and technical aspects of OHS. The guidelines and directives aim to provide specific recommendations on specific tasks. They act as a complement to the applicable legal framework on OHS issues and, where they also set higher OHS standards than the relevant legal framework, these higher standards are binding for the Company and for all persons falling within the scope of this Policy.

The currently applicable guidelines and applicable procedures and instructions of this Policy are posted on the Company's intranet.

Responsible for the adoption of the above-mentioned Guidelines and Procedures within the framework of the OHS Policy is the OHSDD, assisted in the exercise of its competence, where necessary, by OHSCD, ComD and the Legal Department (hereinafter LD).

6. Education

In order to facilitate the early identification of risks and the design of effective actions to prevent them, mitigate their effects and prevent OHS incidents, informative meetings and specialized training seminars are organized, in principle in person (to the maximum extent possible), in all areas and fields of HEDNO's

activities. The aim is to cultivate a safety culture according to which all injuries and illnesses at work can and should be prevented. Responsible for the training in the context of the OHS Policy is the OHSDD, cooperating, in the exercise of its respective competence, when needed, with the OHSCD, the LODD (Learning & Organizational Development Department) and the ComD.

7. Check

Internal audits are carried out to monitor progress and performance on OHS issues. Internal audits, which are carried out in the context of this Policy, also include the process of audits and inspections by internal inspectors and external OHS specialists. All issues identified are addressed in accordance with approved and item-specific action plans, the effectiveness of which are systematically monitored by the OHSDD.

8. Data reporting

All Company Directorates are required within their scope of competence and responsibility to collect, review and report OHS data for the purpose of monitoring progress and planning relevant improvement actions. Data collection is carried out at Service Unit level and overall at Company's level, supporting the analysis of OHS issues as well as further planning at all HEDNO's levels. . The collected data is processed appropriately to calculate leading and lagging KPIs to assess and monitor the performance on OHS issues by the Company's Environment, Health and Safety Committee and the top management. Based on the above assessment, appropriate objectives and strategic actions are set by the Management to achieve continuous improvement in OHS issues.

The OHSDD is responsible for the collection, collation and processing of all the above data and must cooperate and provide, whenever requested, to the Company's Environment, Health and Safety Committee all the necessary information and data regarding the OHS Policy, in order the said Committee to effectively exercise its competences/powers.

9. Responsibilities

All staff members and persons in general who fall within the scope of the OHS Policy, as provided in this Article 1, shall be responsible for compliance with the principles and rules laid down in this OHS Policy. Additionally, it is the responsibility of each staff member to comply with this OHS Policy within the area of his/her functional

responsibility, to set the right example, and to provide guidance to all staff members under his/her authority.

Similarly, the Company's Senior Management must demonstrate leadership and set an example for all employees, while providing appropriate resources, active internal communication based on mutual trust, and visible leadership across the entire range of HEDNO's functions and activities.

10. Implementation and review of the Policy

The OHS Policy is in line with all HEDNO's applicable Policies.

Any questions and issues that arise regarding issues of interpretation and/or implementation of this OHS Policy should be addressed to the OHSD, which is assisted in the exercise of its responsibilities by the Compliance Department (ComD) and the Legal Department (LD).

The OHS Policy should be reviewed at least every two years or at any time depending on the particular needs and circumstances of the Company. In particular, the OHS Policy may be revised whenever it is deemed necessary or appropriate, taking into account in particular the specific needs and circumstances of the Company, the evolution of the relevant requirements of the legal framework on OHS and on the basis of experience gained, the Company's strategy in the field of OHS, and finally the development of new best practices and general developments in legislation and case law in the field of OHS, in order to ensure that the content of the OHS Policy is effectively adapted to the new circumstances.

HEDNO's OHS Policy was approved by Resolution No. 45/19.12.2024 of the HEDNO's BoD and is in force from this date.