

SUSTAINABILITY STATEMENT 2024



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01

CHIEF EXECUTIVE OFFICER'S LETTER



Dear Partners,

The year 2024 has been truly exceptional for ThPA S.A., characterized by a well-planned and successful conclusion of the current strategy period and demonstrating that we continue to deliver on our strategic goals. As the culmination of a productive year, we are pleased to present our first Sustainability Statement for 2024, prepared in accordance with the European Sustainability Reporting Standards (ESRS) set out in the European Corporate Sustainability Reporting Directive (CSRD). We embrace CSRD reporting as a cornerstone of our commitment to transparency and sustainability. Aligned with our vision to be a "Gateway to Growth", this statement reflects our dedication to responsible growth and ESG principles, integrating sustainability into our business and shaping a better future for generations to come.

This Statement outlines the strategy for sustainable development ThPA S.A. and monitors the progress across all aspects of its operations and services. Following a thorough analysis of material issues, aligned with this strategy, we incorporate appropriate practices, and undertake initiatives with a view to addressing the material issues of ThPA S.A.'s stakeholders. Recognizing the vital role of ports in enhancing resilience and sustainability in global trade and maritime, we are committed to implementing policies that balance business operations with environmental responsibility, preventing and mitigating environmental impacts, creating social added value and supporting the local community of Thessaloniki, while ensuring high standards of corporate governance. Our continued inclusion in the ATHEX ESG Index reinforces our dedication towards sustainable growth and responsible business practices.

In 2024, amid geopolitical and supply chain disruptions that continued to arise in the broader area of eastern Mediterranean and with an increasing focus on climate action, ThPA S.A. remained at the forefront of the wider port community. The Container Terminal recorded a significant throughput and revenue increase compared to 2023, and the Port of Thessaloniki experienced nearly a 20% increase in cruise arrivals compared to 2023. In addition, ThPA S.A.'s ongoing participation in national and internationally prestigious events further solidified its position as a port of international importance, promoting connectivity and enhancing Greece's international outlook. In the direction of developing solutions in the fields of logistics, intermodal services, tourism, and sustainable practices, ThPA S.A. is constantly participating in innovation projects for the benefit of the societies and economies of the Balkans and the wider region of the Southeast, Central and Eastern Europe.

In line with our environmental goals, we accelerated our initiatives to reduce GHG emissions by investing in green technological solutions: We have increased the share of electricity generated from renewable energy sources and plan to further invest in photovoltaic systems to reduce carbon emissions, as well as in the adoption of hybrid equipment to further reduce fuel consumption. Additionally, at ThPA S.A., we

monitor seawater quality biannually to ensure compliance with environmental standards and safeguard marine resources. We conduct annual energy reviews and implement a comprehensive anti-pollution Contingency Plan which is updated annually.

Our people remain the driving force behind our business activities and achievements: Over the past year, we have introduced a series of training initiatives to further develop our personal and professional skills. We stand by our people, supporting them both personally and professionally in an environment of inclusion and equality. We are dedicated to safeguarding the health and safety of our employees and all users of the port area. We have initiated inspection procedures and incident investigation processes to safeguard the port environment, minimizing potential risks during loading, unloading, embarkation and disembarkation, as the safety and wellbeing of our employees, visitors, and the community remains one of our top priorities. At the same time, we deeply value our connection with local communities, building strong, meaningful relationships based on trust, respect

and collaboration. In 2024 we continued to promote a "greener" future for younger generations, by having carried out an underwater sea cleaning action at the Thessaloniki waterfront.

As we evolve as an organization, we place great value on business ethics and responsible corporate governance. Acting legally, with integrity and respect for society and the environment, maintains a pivotal role regarding our long-term approach. Throughout 2024, we developed and launched specific policies and procedures to create a well-structured and efficient approach regarding several aspects of ThPA S.A.'s operation.

Looking towards 2025, ThPA S.A. will continue its efforts to develop a more sustainable future and create long-term value for all its stakeholders. A sustainable port is not just about greener operations, it's also about empowering people and communities, continuing to act as a responsible entity. ThPA S.A. will continue monitoring environmental issues with equal responsibility, while improving its energy efficiency and its environmental footprint. Thus, we contribute to the enhancement of environmental awareness in the maritime sec-

tor. Our goals include achieving zero workplace accidents, zero incidents of corruption and maintaining the strong and lasting relationships of mutual trust with the local communities.

We would like to express our sincere appreciation to all our stakeholders for their trust and support. We remain determined in our commitment to operate with responsibility and business ethics, while contributing to social and economic prosperity in balance with sustainable development. With a skilled and diverse workforce and supported by a strong governance framework, ThPA S.A. has a great potential to deliver all its sustainability targets in 2025. We are confident that our sustainability strategy will reinforce our growth path and navigate future challenges. Let's work together to create a smarter, greener, and more resilient future for our industry, our society and our planet.

Dr. Ioannis Tsaras
Chief Executive Officer



02

HIGHLIGHTS

2024 in a Nutshell	
↘ 2023	↘ 2024
32.6 MIL. € EBITDA	42.6 MIL. € EBITDA
85.8 MIL. € REVENUE	100.523 MIL. € REVENUE
— CapEx	2.088 MIL. € CapEx
— OpEX	1.828 MIL. € OpEX
1,525 Ship Visits	1,581 Ship Visits
68 Cruise Ship Visits	81 Cruise Ship Visits
520,048 Containers (TEU)	565,595 Containers (TEU)
7,362,408 TN Cargo	8,490,728 TN Cargo

ESG Performance

Environment

5,948.99 tCO₂ EQ

Total Scope 1 & 2 GHG emissions (market-based)

36.22%

Share of renewable sources in total energy consumption

Investing in Advanced Technologies for Emission Reduction

4,551.13 TN

Total waste recycled (2024)

Implementing an Environmental Management System (EMS) for all port activities certified with ISO 14001: 2015

↘ 2023

357,168 M³

↘ 2024

319,829.17 M³

Water consumption

Social

0

Human rights incidents

↘ 2023

16.5%

↘ 2024

15.23%

Women in the workforce

15.28

Total average number of training hours per employee

0

Fatalities as a result of work-related injuries

Governance

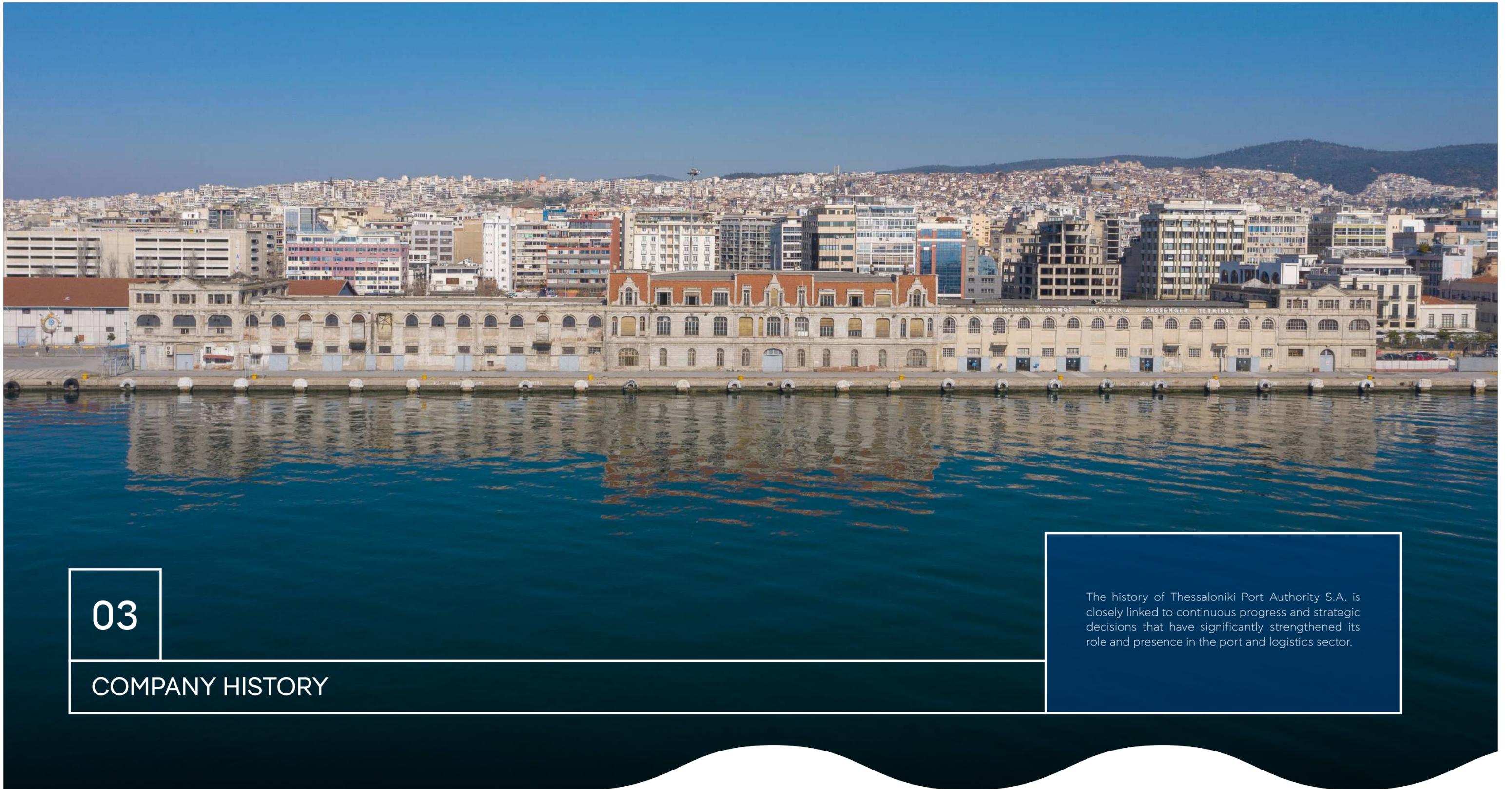
0

Incidents of non-compliance with regulations and legislation on financial, environmental, labor, and social matters

0

Corruption and bribery incidents

Prioritizing environmental management, health and safety, and social responsibility in supplier evaluation



03

COMPANY HISTORY

The history of Thessaloniki Port Authority S.A. is closely linked to continuous progress and strategic decisions that have significantly strengthened its role and presence in the port and logistics sector.

1904

Establishment of the French Company "Société Anonyme Ottomane de Construction et Exploitation du Port de Salonique", with the right to operate the port facilities until 1944.

1914

Founding law for the "Free Zone of the Port of Thessaloniki", which takes over the management of the largest part of the port, with the main responsibility being the loading, unloading and transport activities. Outbreak of World War I - interruption of setting up the new management structure.

1923

March: Establishment of the legal entity "Commission of the Free Zone of Thessaloniki" - operation October 1925.

September: Establishment of the "Serbian Free Zone of Thessaloniki", later renamed "Yugoslav Free Zone of Thessaloniki" - operation July 1929, abolished 1975.

1928

Establishment of the "Committee for the Regulation of Loading-Unloading of the Port of Thessaloniki".

1930

The "Thessaloniki Port Fund" was established and took over the contract of operation of the port from the "Société Anonyme Ottomane de Construction et Exploitation du Port de Salonique", which expired in 1944. Its purpose was the construction of new facilities and the maintenance of existing ones.

1932

Formation of the "Labor Office of the Port of Thessaloniki" with responsibility for the management of the dockworkers.

1953

The "Free Zone of Thessaloniki" and the "Thessaloniki Port Fund" were merged into a single public entity named "Free Zone and Port of Thessaloniki".

1970

By the Law 449/1970, the "Free Zone and Port of Thessaloniki" was renamed to "Thessaloniki Port Authority" (ThPA) and ThPA took over the management of the dockworkers from the "Committee for the Regulation of Port Loading-Unloading of Thessaloniki Port", which was abolished.

1999

The organization turned into a Société Anonyme with the registered name "Thessaloniki Port Authority S.A." and the trading name "ThPA S.A."

2001

ThPA S.A. was listed on the Athens Stock Exchange.

2012

Transfer of shares from the Greek State to the "Hellenic Republic Asset Development Fund" (HRADF).

2014

Launch of tender process regarding the acquisition of the majority stake (67%) of ThPA S.A. shares.

2018

Acquisition of 67% of shares by South Europe Gateway Thessaloniki (SEGT) Ltd.

2022

- Arrival of the 2 New Panamax STS Cranes.
- New Terminal Operating System (TOS) and new Truck Appointment System (TAS).
- Intermodal Rail Connection between the Port of Thessaloniki and Nis (Serbia).

2021

- ThPA S.A. becomes the first Greek port certified with ISO 45001:2018 for Occupational Health and Safety.

2020

- Delivery of a new Mobile Harbor Crane.
- Establishment of dry port in Sofia (Bulgaria) and direct rail connection between the Port of Thessaloniki and Sofia dry port.

2019

- The Port of Thessaloniki becomes the 1st Greek port of the Green Award network as an incentive provider.
- Publication of the 1st Sustainability Report.
- Delivery of 12 new Straddle Carriers ().

2023

- New Cruise Terminal "Alexander the Great".
- Intermodal Rail Connection between the Port of Thessaloniki and Skopje (Republic of North Macedonia).
- 1st Underwater Sea Cleaning at the Port of Thessaloniki.
- Inclusion in the ATHEX ESG Index.

2024

- 2nd Underwater Sea Cleaning, for the first time on Thessaloniki waterfront.
- Highest historical container throughput at the port (565,595 TEU).

2051

ThPA S.A. has the exclusive right to use the sea and land zone of the Port of Thessaloniki.





04

PARTICIPATIONS AND AWARDS

Participations in Organizations and Associations

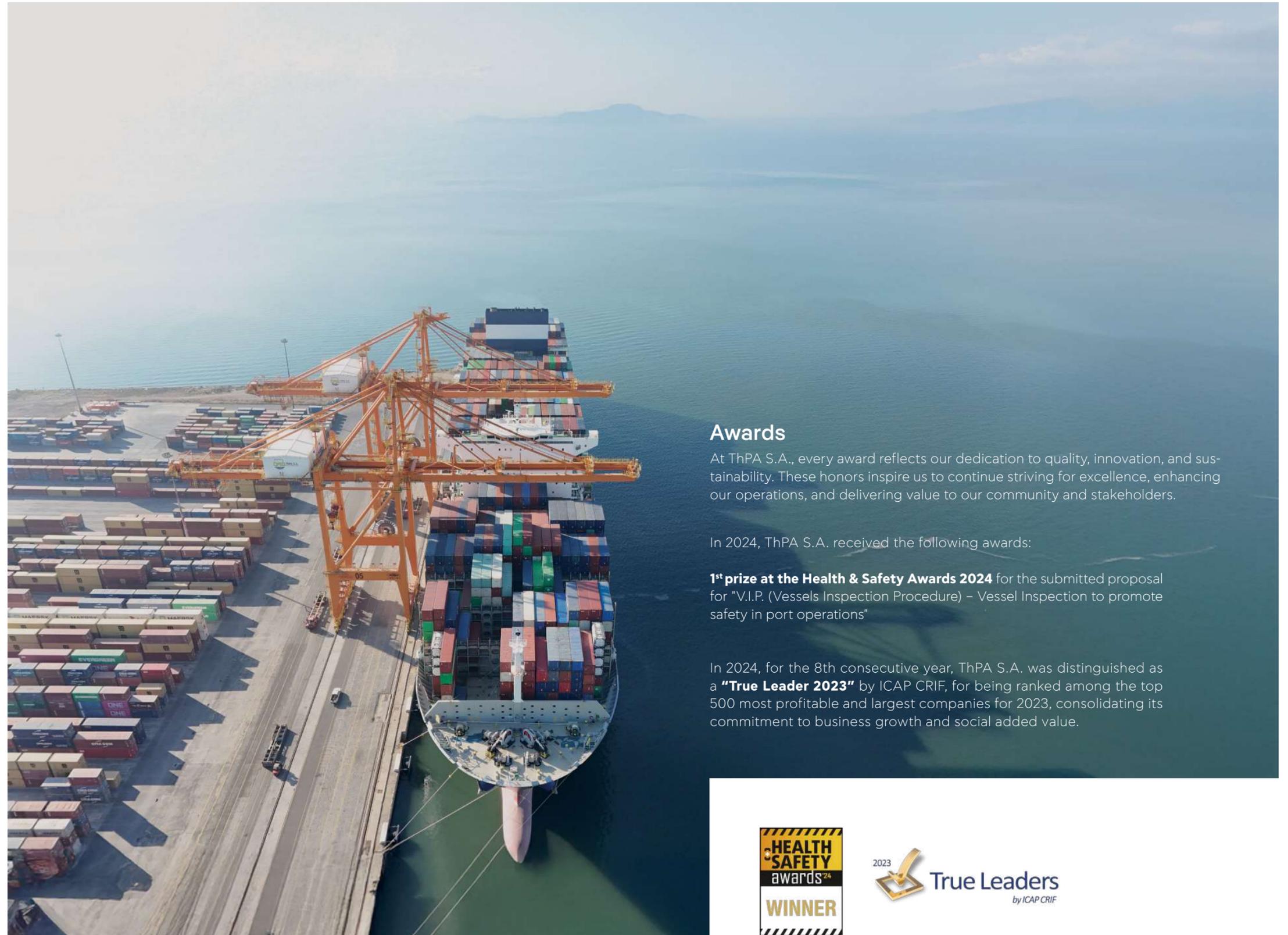
ThPA S.A. maintains active participation in various key institutions to stay updated with developments, best practices and regulatory changes in the areas of its activities. The development of strong and mutually beneficial relationships with the industry contributes to the creation of growth opportunities and enhances the credibility of the Company, while creating added value for all stakeholders.

In 2024, our Company participated in the following key organizations and associations, showcasing our commitment to collaboration and industry leadership:

- European Sea Ports Organisation (ESPO)
- ECOPORTS network
- Association of Mediterranean Cruise Ports (MedCruise)
- Thessaloniki Tourism Organization
- Green Award Network
- The EXANTAS Port Training Institute
- Hellenic Ports Association (ELIME)
- Cruise Lines International Association (CLIA)
- Hellenic Marine Environment Protection Association (HELMEPA)

In addition to the above initiatives, ThPA S.A. is also a member of and actively involved in the following Entities and Chambers:

- Greek Exporters Association
- Federation of Industries of Greece
- Greek Association of Supply Chain
- Hellenic American Chamber
- Hellenic-German Chamber of Commerce and Industry
- Hellenic-French Chamber of Commerce and Industry
- Greek-Serbian Commercial, Tourist, Trade and Industrial Chamber of Northern Greece
- Thessaloniki Convention Bureau
- Association of Chief Executive Officers
- Union of Listed Companies



Awards

At ThPA S.A., every award reflects our dedication to quality, innovation, and sustainability. These honors inspire us to continue striving for excellence, enhancing our operations, and delivering value to our community and stakeholders.

In 2024, ThPA S.A. received the following awards:

1st prize at the Health & Safety Awards 2024 for the submitted proposal for "V.I.P. (Vessels Inspection Procedure) – Vessel Inspection to promote safety in port operations"

In 2024, for the 8th consecutive year, ThPA S.A. was distinguished as a **"True Leader 2023"** by ICAP CRIF, for being ranked among the top 500 most profitable and largest companies for 2023, consolidating its commitment to business growth and social added value.





05

BASIS FOR PREPARATION

BP-1 General Basis for Preparation of Sustainability Statements

The present ThPA S.A.'s Report is consolidated and has been adjusted and revised to comply with the requirements of the European Sustainability Reporting Standards (ESRS). This includes aligning the scope, structure, and content of the Sustainability Report with the ESRS standards, ensuring comprehensive and compliant reporting. The current report covers the parent Company, namely ThPA S.A. ThPA S.A. has one subsidiary, ThPA Sofia EAD and its financial contribution is deemed insignificant and has minor operational contribution and marginal influence on the Group's overall sustainability profile. However, the activities of ThPA Sofia EAD are not excluded from the scope of this report, nor from the identification of material impacts, risks, and opportunities (IROs) as ThPA S.A. remains committed to ensuring the unbiased identification of IROs.

The scope of the ThPA S.A. Sustainability Report is the same as that of the financial statements, which are consolidated and include all group entities.

The Sustainability Statement of ThPA S.A. provides comprehensive coverage of all its business activities. As detailed in the respective sections, ThPA S.A. defines its value chain broadly to include not only its internal operations but also the upstream and downstream elements of its value chain. This means that ThPA S.A. takes into account the environmental, social, and governance (ESG) impacts associated with its suppliers, contractors, and other stakeholders involved in the provision of goods

and services, as well as those related to the port services offered by the Company. The boundaries of the value chain will be specified where relevant and explanatory notes will be provided for any exceptions. This approach ensures transparency and a thorough understanding of the ESG aspects influencing the Company's operations.

ThPA S.A. confirms that it has not elected to omit any impending developments or matters currently under negotiation from this sustainability statement. All relevant material information has been disclosed in accordance with ESRS requirements to ensure transparency and completeness.

BP-2 Disclosures in Relation to Specific Circumstances

Value Chain Metrics

ThPA S.A. is committed to ensuring the highest standards of accuracy, transparency and accountability in recording and disclosing data and results related to the Company's sustainability. As part of this commitment, we reviewed the metrics used for value chain data to determine whether estimates from indirect sources were necessary. Conclusively, all measurements reported are based on reliable and direct sources.

Sources of Estimation and Outcome Uncertainty

ThPA S.A. has reviewed and confirmed that all quantitative indicators and monetary amounts disclosed in this statement are founded on reliable data and measurement methods. No amounts are subject to a high level of measurement uncertainty.

Changes Against Last Year

This year, ThPA S.A. has significantly updated the preparation and presentation of its sustainability information. While last year's report adhered to the Global Reporting Initiative (GRI) Standards, this year's report aligns with the Corporate Sustainability Reporting Directive (CSRD). The transition to the CSRD framework enables a more comprehensive and standardized approach to sustainability reporting, complying with European Union regulations and enhancing comparability for stakeholders.

ThPA S.A. confirms that no revised comparative data is available for the current reporting period, and there is no difference between the data published in the previous period and the current data. Additionally, ThPA S.A. confirms that no material differences have been identified in previously reported periods, and no corrections or adjustments have been required for prior periods included in the sustainability statement. As no errors or corrections for prior periods have been identified, adjustments are not necessary.

Other EU Legislations Included

This Sustainability Statement includes data from ThPA S.A., providing a comprehensive overview of its activities. It informs stakeholders about how we are managing important issues, the actions we are taking for Sustainable Development and our contribution to the United Nations Sustainable Development Goals (SDGs). The statement, prepared in accordance with the CSRD Directive, reflects our commitment to transparency, accountability and alignment with evolving sustainability standards. The reported period covers from 1 January 2024 to 31 December 2024 and includes all business activities of ThPA S.A.

Time Horizons

ThPA S.A. aligns the Sustainability Statement with the time horizons defined by the European Sustainability Reporting Standards (ESRS), using as a short-term horizon the period up to one year, as a medium-term horizon the period from one to five years and as a long-term horizon the period over five years. This ensures compliance with the requirements of the ESRS and provides a clear framework for assessing and reporting sustainability-related objectives and performance over different time horizons.

Incorporation by Reference

Disclosure Requirement	Reference
GOV-1 – The role of the administrative, management and supervisory bodies	Corporate Governance Statement
GOV-1 – The role of the administrative, management and supervisory bodies	Corporate Governance Statement

Use of Phase-In Provisions in Accordance with Appendix C of ESRS 1

ThPA S.A. aligns the Sustainability Statement with the time horizons defined by the European Sustainability Reporting Standards (ESRS), using as a short-term horizon the period up to one year, as a medium-term horizon the period from one to five years and as a long-term horizon the period over five years. This ensures compliance with the requirements of the ESRS and provides a clear framework for assessing and reporting sustainability-related objectives and performance over different time horizons.





06

GOVERNANCE

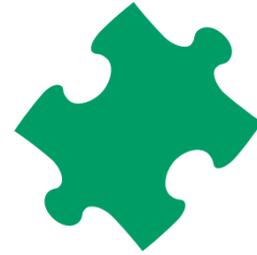
GOV-1 The Role of the Administrative, Management and Supervisory Bodies

ThPA S.A. has implemented a governance structure designed to ensure ethical business practices, transparency and reinforce accountability across all aspects of its operations. Through well-defined governance bodies, the Company maintains effective oversight, fosters responsible decision-making and aligns its activities with regulatory requirements and corporate values. The Company's governance structure, in relation to sustainability matters, is categorized into supervisory bodies, management bodies, and administrative bodies.

To monitor, manage and oversee impacts, risks, and opportunities, during the reporting period, responsibilities and roles have been developed throughout the Company, at the Board, Management, and operational level. This governance structure enables sustainability issues to be embedded in the key business processes and ensures the oversight of ESG related issues (including impacts, risks and opportunities) across three levels: Board Level, Management level and operational level.

For more information regarding the administrative, management and supervisory bodies (expertise and related to sustainability expertise), please refer to the Corporate Governance Statement.

The role of each administrative, management and supervisory body related to sustainability matters among others, is described below in detail.



The General Meeting of Shareholders

The General Meeting of Shareholders is the highest governing authority of the Company, ensuring responsible corporate oversight in accordance with applicable legislation. It assembles at least once a year, reviews and approves the financial and non-financial statements of ThPA S.A., appoints the auditors and evaluates the overall performance and management practices of the Company. Adhering to the principles of transparency and sustainability, its decisions are binding on all shareholders, enhancing corporate responsibility and long-term resilience.

Board of Directors (BoD)

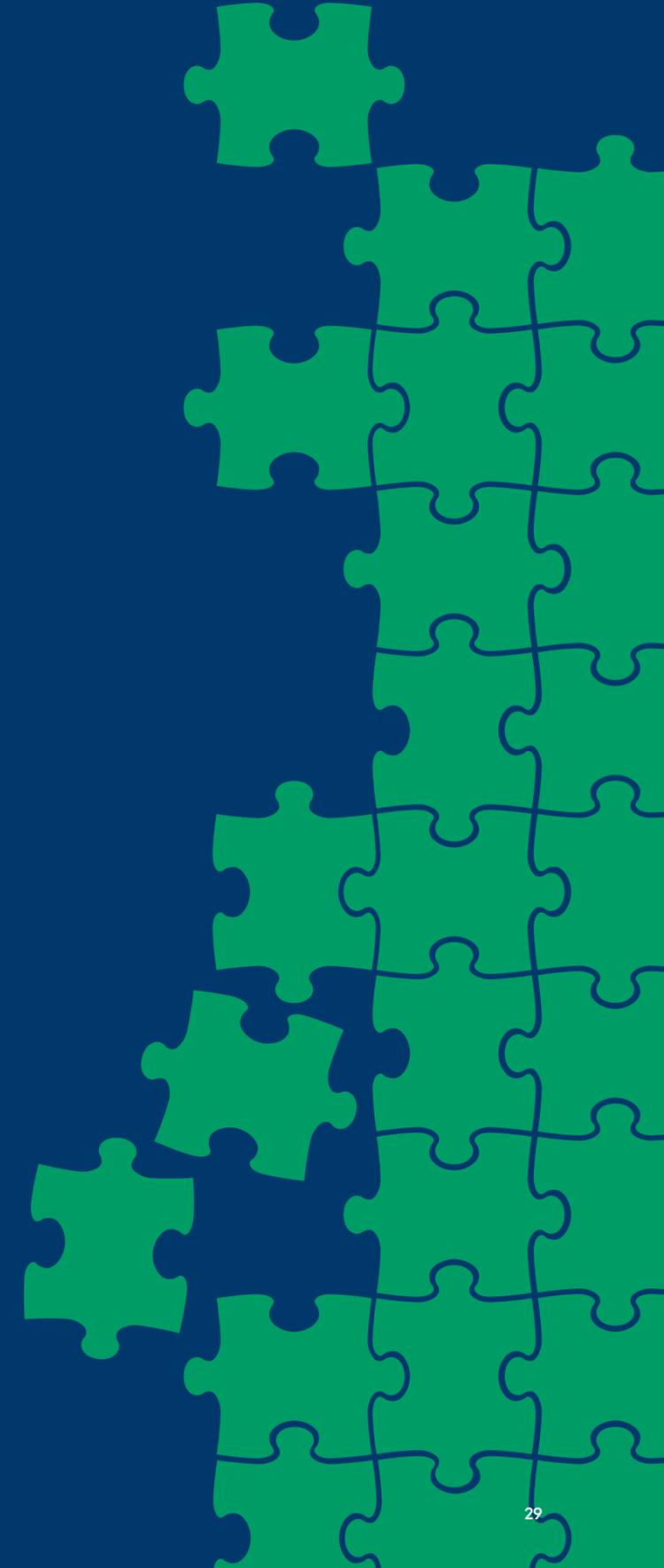
The Company is governed by the Board of Directors (BoD), which as the management body, defines and supervises the implementation of the corporate governance system. The BoD takes decisions relating to the management of the Company, matters regarding the administration of its assets according to the various legal and regulatory provisions and the general pursuit of its purpose. According to ThPA S.A.'s Charter of Company, the Board of Directors comprises of a minimum of nine (9) and a maximum of eleven (11) members (the "Members"). Members are elected by the General Meeting, which also designates the term in office of Members. The Board of Directors elects one Member as Chairman and one Member as Vice-Chairman. The Board of Directors shall elect one Member as the Chief Executive Officer. The offices of the Chief Executive Officer and the Chairman may but are not required to coincide in the same individual.

Its size and composition reflect the size, scope and complexity of the activities and the shareholder structure of the Company. The composition of the Board of Directors reflects the knowledge, skills and experience required to exercise its responsibilities, in accordance with the business model and strategy of the Company: It is comprised of persons from different backgrounds and with diverse skills, assuring maximum inputs to the governance of the Company. The CVs of the BoD members are available on the corporate site of ThPA S.A. and the Statement of Corporate Governance, providing detailed information about their relevant experience in the sector. It is noted that the composition of the BoD does not include representatives of employees or other workers. However, a representative of the Company's employees or/and a representative from the Municipality of Thessaloniki may attend the meetings of the Board of Directors as observers. The participation of these representatives shall be limited only to deliberations associated with labour issues or the city of Thessaloniki correspondingly.



The Company has established a Suitability Policy of the members of the Board of Directors, which in its applicable updated form is posted on its website and includes the principles and criteria of the individual suitability of each member and the collective suitability of the Board of Directors as a whole. In line with ThPA S.A.'s Suitability Policy for Board members, specific principles and criteria have been set to assess the individual suitability of each member, and the collective suitability of the BoD as a whole. The members of the BoD are divided into: a) executive, b) non-executive and c) independent non-executive. The BoD has delegated some of its powers to its Executive Chairman of the BoD, the Chief Executive Officer, the Executive Committee and the Chief Officers of the Company. The BoD determines the values and a strategic direction of the Company, approves the strategy, business plan and budget and evaluates the risks and opportunities to ensure alignment with the established strategy. Also, the BoD supervises implementation of the strategy and its execution that align with long-term environmental, social, and economic sustainability. A candidate member of the Board of Directors is assessed for its knowledge, and experience on ESG matters. Additionally, the knowledge, experience and contribution of the members of the Board of Directors on Sustainable Development constitute criterion of the annual evaluation of the collective suitability of the Board of Directors, as well as the self-assessment of the members of the Board of Directors.

The Management also ensures that the Sustainability strategy -as described in the context of the Sustainability Policy- is aligned with ThPA S.A.'s vision, mission, and values. ESG elements are occasionally addressed in the Management discussions, in line with best international practices and as needed.



The composition of the Board of Directors (BoD) at 31/12/2024 was:

Member name	Position	Executive Member	Non-Executive Member	Independent Non-Executive
Athanasios Liagkos	Executive Chairman of the BoD	✓		
Panagiotis Michalopoulos	BoD Vice-Chairman			✓
Ioannis Tsaras	Chief Executive Officer	✓		
Konstantinos Fotiadis	Non-Executive Member		✓	
Martin Masson	Non-Executive Member		✓	
Panagiotis Stampoulidis	Non-Executive Member		✓	
Angeliki Samara	Independent non-executive Member			✓
Efstathios Koutmeridis	Independent non-executive Member			✓
Evangelia Damigou	Non-Executive Member		✓	
Zonglyu (Jessie) Lu	Non-Executive Member		✓	

Board Composition ¹	Unit	2024
The number of executive members	No.	2
The number of non-executive members	No.	8
Percentage of independent board members	%	30%
Board's gender diversity ratio	No.	0.43
Percentage of male board members	%	70%
Percentage of female board members	%	30%

The BoD of ThPA S.A. consists of members with extensive experience and expertise in several fields, such as port management, banking and financial institutions. Some of the members have also served as advisory members on port authority boards and urban planning committees. The Chairman, Mr. Athanasios Liagkos, has had a long career in senior management positions in ports. He has served as member of the Hellenic Republic Asset Development Fund (HRADF) as a coordinator of the National Strategic Plan for Ports and Marinas and he served as a BoD member in all Port Authorities in Greece. He has held top executive positions in banks, financial institutions, and large corporations, as well as member of the Board of Directors in Company groups. The Vice Chairman, Mr. Panagiotis Michalopoulos, has extensive experience in the design, study, supervision, and construction of buildings, as well as in the functional arrangement of spaces and organization of construction sites. He has also been the partner and manager of the publishing-advertising-construction Company Eurodiastasi Ltd. Additionally, he has held senior management positions in various organizations, and was a member of various associations, cultural institutions and commercial chambers. The CEO, Mr. Ioannis Tsaras, has experience in energy, irrigation, and spatial planning projects, as well as in the financial sector, managing European funding instruments designed for the private sector. In the past he had been appointed for 6 years as CEO of ThPA S.A. and after that as General Manager of PFIC Ltd, a large phosphate fertilizer chemical industry.

The other members of the Board of Directors have worked in areas such as capital management, corporate governance, commercial negotiations, and international project management. Each member contributes their knowledge and skills, ensuring the implementation of best practices and compliance with regulatory frameworks.

For more information regarding the role of the administrative, management and supervisory bodies and their sustainability-related experience relevant to the sectors, products and geographic locations of ThPA S.A., please refer to the Corporate Governance Statement. The BoD of ThPA S.A. consists of members with extensive experience and expertise in several fields, such as port management, banking and financial institutions. Some of the members have also served as advisory members on port authority boards and urban planning committees. The Chairman, Mr. Athanasios Liagkos, has had a long career in senior management positions in ports. He has served as member of the Hellenic Republic Asset Development Fund (HRADF) as a coordinator of the National Strategic Plan for

Ports and Marinas and he served as a BoD member in all Port Authorities in Greece. He has held top executive positions in banks, financial institutions, and large corporations, as well as member of the Board of Directors in Company groups. The Vice Chairman, Mr. Panagiotis Michalopoulos, has extensive experience in the design, study, supervision, and construction of buildings, as well as in the functional arrangement of spaces and organization of construction sites. He has also been the partner and manager of the publishing-advertising-construction Company Eurodias-tasi Ltd. Additionally, he has held senior management positions in various organizations, and was a member of various associations, cultural institutions and commercial chambers. The CEO, Mr. Ioannis Tsaras, has experience in energy, irrigation, and spatial planning projects, as well as in the financial sector, managing European funding instruments designed for the private sector. In the past he had been appointed for 6 years as CEO of ThPA S.A. and after that as General Manager of PFIC Ltd, a large phosphate fertilizer chemical industry.

Executive Chairman of the BoD

The BoD elected one of its members as Executive Chairman. The Executive Chairman oversees and directs the Board of Directors (BoD), ensuring its effective operation in alignment with sustainable governance principles. Responsible for convening meetings, setting the agenda, and maintaining organizational efficiency, the Executive Chairman fosters transparent decision-making and strategic oversight. By ensuring well-structured discussions and responsible management, they support the Board in advancing long-term sustainability and corporate resilience. According to the Internal Regulation of ThPA S.A., ESG Policy is among the pillars which are under the competence of the Executive Chairman of the BoD.

Committees of the BoD

The Company's Committees play a significant role in supporting effective governance; ensuring transparency, and enhancing decision-making by providing oversight and expertise in key areas of operation. ThPA S.A. has the following Board of Director's committees: a) Audit Committee, b) Remuneration Committee, and c) Nomination Committee. The Board of Directors has also created an Executive Committee at managerial level and has delegated specific authorities to it. Each Committee operates in accordance with a defined scope and its Charter which sets out in particular its role, the process of its fulfilment, as well as the process for convening and holding its meetings.



Audit Committee

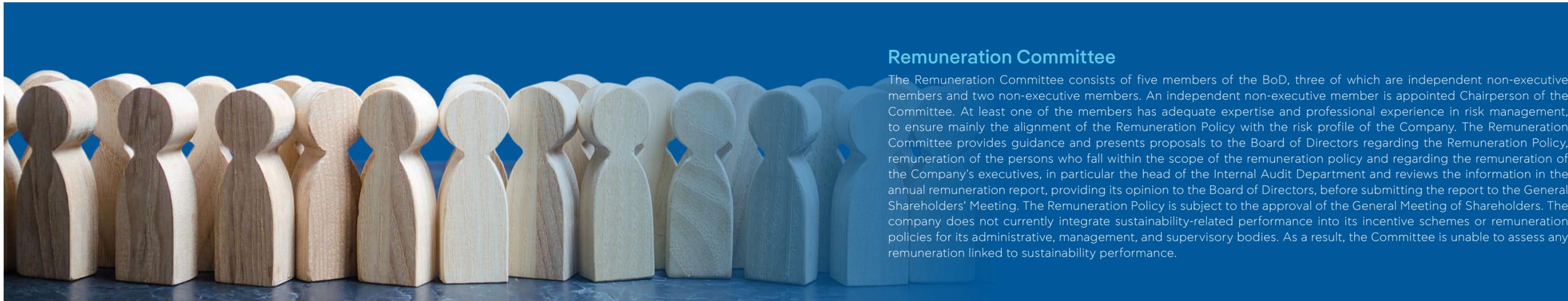
The Audit Committee is established to support the BoD in its duties in relation to the systemic supervision of governance, risk management, financial reporting, statutory audits and internal audit practices. It ensures the Company's compliance with regulatory requirements and promotes transparency in the Company's operations. The Committee consists of three non-executive members of the BoD, two of which are independent non-executive members and one non-executive member. An independent non-executive member is appointed Chairperson of the Committee. Beyond its core responsibilities, it also plays a significant role in monitoring sustainability-related matters, which are presented in the Report of the Proceedings of the Audit Committee submitted to the General Meeting.

Additionally, it reviews issues raised by the Compliance and Risk Management Officer, particularly regarding updates to the Risk Register. In its meetings, the Committee focuses on ensuring the integrity of financial reporting, the adequacy of internal controls, the compliance with legal and regulatory frameworks, and the identification and management of risks, providing the BoD with well-documented recommendations. Its key areas of focus include:

- Proposal and selection of external auditors, supervision of their work, as well as review and monitoring of their independence and objectivity.
- Monitoring the effectiveness of internal control, quality assurance and risk management systems.
- Monitoring, examination and evaluation of the financial reporting process and the preparation of the Company's Financial Statements and related non-financial items.
- Ensuring compliance with the current legal, regulatory, and general institutional framework.
- Overseeing audit reports and the activities of the Internal Audit Department.
- Submitting an annual report to the General Meeting of Shareholders of ThPA S.A., including an overview of ThPA S.A.'s sustainable development initiatives.

Considering the recent Law 5164/12.12.2024, and the approval of the non-financial reporting, based on the sustainability responsibilities, ThPA S.A. is in progress to update the relevant charter of the Audit Committee to incorporate certain provisions of the law.





Remuneration Committee

The Remuneration Committee consists of five members of the BoD, three of which are independent non-executive members and two non-executive members. An independent non-executive member is appointed Chairperson of the Committee. At least one of the members has adequate expertise and professional experience in risk management, to ensure mainly the alignment of the Remuneration Policy with the risk profile of the Company. The Remuneration Committee provides guidance and presents proposals to the Board of Directors regarding the Remuneration Policy, remuneration of the persons who fall within the scope of the remuneration policy and regarding the remuneration of the Company's executives, in particular the head of the Internal Audit Department and reviews the information in the annual remuneration report, providing its opinion to the Board of Directors, before submitting the report to the General Shareholders' Meeting. The Remuneration Policy is subject to the approval of the General Meeting of Shareholders. The company does not currently integrate sustainability-related performance into its incentive schemes or remuneration policies for its administrative, management, and supervisory bodies. As a result, the Committee is unable to assess any remuneration linked to sustainability performance.

Nominations Committee

The Nomination Committee consists of five members of the BoD, three of which are independent non-executive members and two non-executive members. An independent non-executive member is appointed Chairperson of the Committee. Its primary purpose is the identification of the suitable candidates that meet the qualifications required in the Suitability Policy to acquire the status of member of the BoD and its Committees. In this context, the Committee assists the BoD by ensuring that all its members and the members of the BoD's Committees continue to meet the suitability criteria defined in the Company's Suitability Policy both on an individual and collective basis.

The Committee is also responsible for:

- Ensuring that the updated CVs of all BoD members are publicly available on ThPA S.A.'s website.
- Reviewing and recommending updates of the Suitability Policy for Board members, as well as policies for their continuous education.
- Assessing the time required to be devoted by BoD and Committee members to effectively perform their duties.
- Ensuring that the management and supervisory bodies possess relevant sustainability experience to integrate environmental, social and governance principles into corporate strategy and decision-making.

The compositions of the BoD Committees at 31/12/2024 are presented in the following table:

Audit Committee	Nominations Committee	Remuneration Committee
Panagiotis Michalopoulos (Chairman)	Angeliki Samara (Chairwoman)	Panagiotis Michalopoulos (Chairman)
Efstathios Koutmeridis (Member)	Panagiotis Michalopoulos (Member)	Angeliki Samara (Member)
Panagiotis Stampoulidis (Member)	Efstathios Koutmeridis (Member)	Efstathios Koutmeridis (Member)
	Martin Masson (Member)	Martin Masson (Member)
	Konstantinos Fotiadis (Member)	Konstantinos Fotiadis (Member)

ESG Governance Structure

The ESG governance structure at ThPA S.A. is designed to ensure effective oversight and integration of sustainability objectives across all levels of the organization. This structure has at its heart the Sustainability Committee, which is a key component in providing direction for ThPA S.A. sustainability matters. The Sustainability Committee is an advisory committee. It informs, analyses, evaluates, and advises the Company's Management regarding the sustainable development strategy and assists in making decisions on matters related to the sustainable development and environmental strategy. It works under the direct supervision of the Executive Chairman of BoD and ensures that the Sustainability Policy principles and practices are effectively implemented. Furthermore, the Sustainability Committee does oversee the annual implementation of the Company's Sustainability Strategy, and responsibilities to deal with impacts, risks, and opportunities concerning sustainability, have been assigned by the BoD to the Compliance & Risk Management Officer.



In addition, the Sustainability Team, led by the Director of Sustainability and Environmental Strategy, operates as the Committee's dedicated operational arm. This Team oversees ESG-related issues, assessments, project implementation and daily monitoring of the Sustainability Policy execution. The Team collaborates daily with the Director of Sustainability and Environmental Strategy, who consolidates findings and recommendations. As the main link between the business departments and the Management, the Director of Sustainability and Environmental Strategy keeps the Management informed on key ESG issues, including strategic advice and ESG priorities aligned with the Company's wider objectives. The Team also prepares and submits reports regarding the Sustainability Policy implementation for the Executive Chairman of the BoD on an annual basis.

ThPA S.A. has established a well-defined sustainability governance framework, which formally outlines specific responsibilities as to who is charged with addressing impacts, risks and opportunities related to sustainability, and is in a process to update internal documents such as terms of reference and board mandates. Each body's or individual's responsibilities for impacts, risks and opportunities are reflected in the Company's existing policies such as the Sustainability Policy. This Policy is approved by the ThPA S.A. Executive Committee and is valid for three years since the date of its approval, unless revised and/or amended earlier due to a substantial change in the conditions under which it was prepared. Every modification of the Policy is adequately documented and approved by the ThPA S.A. Executive Committee.

The administrative, management, and supervisory bodies, along with senior executive management, are responsible for overseeing sustainability-related matters. Since no targets related to material impacts, risks, and opportunities have been set, no official process for monitoring progress has been adopted. However, the company remains engaged in assessing relevant sustainability considerations and taking any proactive actions if deemed necessary.

BoD's Role on Sustainability

ThPA S.A. ensures that the Board of Directors, as the governing and supervisory body, possesses the necessary skills to address sustainability challenges through established training programs. These programs focus on identifying and prioritizing material ESG impacts, risks, and opportunities, as well as setting measurable sustainability targets. Training also covers regulatory developments and emphasizes transparent sustainability reporting. Furthermore, a specific training on environmental and social issues is planned to be conducted next year for the management bodies of ThPA S.A., but it has not been officially approved yet.

The Board of Directors is committed to determine the frequency of evaluating the competencies, diversity, knowledge, and experience of the individual members of the Board of Directors and the Executive Management, including whether they collectively possess, or are able to leverage, relevant sustainability expertise. The evaluation for 2024 -once completed within the first months of 2025- will conclude accordingly, i.e. whether each individual Board member possesses skills that are relevant to ThPA S.A.'s material IROs, as well as to the industry in general, the geographical location of business activities, and the type of target consumers and end-users. The Board of Directors collectively hold sufficient sustainability expertise currently and are highly capable of aligning overall strategy with sustainability goals. The evaluation also demonstrates whether each member of the Executive Management has expertise and extensive knowledge in different areas of sustainability that relate directly to the Company's material IROs. However, not every member of the Executive Management is evaluated through this process.

The members of the Board of Directors who have experience and extensive knowledge on areas of sustainability that relate directly to Company's material IROs, are:

Panagiotis Michalopoulos (Vice-Chairman of the Bod) in his capacity as an engineer and having served as a senior manager in companies and bodies of the public and private sector, with legal responsibilities including representative issues such as the Environment, the Society and the Corporate Governance (ESG), he has gained a long experience on issues related to the identification of risks associated to sustainable development.

Angeliki Samara (Independent, non-executive member) in her capacity as Assistant Professor has specific research interests which include Financial Reporting, International Financial Reporting Standards, Accounting, Auditing and Audit Committees and ESG.





GOV-2 Sustainability Governance

The Company's administrative, management and supervisory bodies are in the early stages of integrating the assessment of impacts, risks, and opportunities into strategic decision-making, major transactions, and risk management. At this stage, these factors are considered primarily through discussions with key executives responsible for sustainability, risk management, and compliance, as well as through periodic reporting to governance bodies. While the Double Materiality Assessment (which the Sustainability Committee has been thoroughly informed about in this reporting year) has provided an initial framework for identifying material issues, the Company is in the process of embedding these considerations into decision-making structures. ThPA S.A. is in the process of developing reporting mechanisms that ensure governance bodies are updated on a regular basis, annually at least. As part of this process, the Company aims to enhance the systematic review of due diligence implementation and policy effectiveness at the governance level, ensuring comprehensive oversight. Considering that both the CSRD framework and the Double Materiality Assessment concept are quite recent, the Company is currently developing its own approach to systematically consider impacts, risks and opportunities when overseeing its strategy, its decisions on major transactions, and its risk management process, including potential trade-offs associated with those impacts, risks and opportunities. The Company is expected to formalize such integration in the immediate future and identify specific impacts, risks, and opportunities to be treated at the governance level. Therefore, it plans to inform its administrative, management and supervisory bodies about the results of the materiality analysis on an annual basis.



GOV-3 Integration of Sustainability-Related Performance in Incentive

The Company does not currently incorporate sustainability-related performance in its incentive schemes or remuneration policies for members of its administrative, management, and supervisory bodies. The Company constantly evaluates its compensation scheme and is considering the addition of sustainability-linked incentives as it progresses along on the pathway of its evolving ESG strategy.

GOV-4 Statement on Due Diligence

ThPA S.A. integrates due diligence into its governance, strategy, and business practices by identifying environmental, governance and key human rights risks within its supply chain, helping to prioritize where to focus efforts and resources. This process includes engaging with affected stakeholders to ensure their views are considered at every critical stage. After identifying risks, ThPA S.A. evaluates potential gaps in its processes and creates targeted improvement plans to effectively address any remaining risks. The following table highlights where the Company's due diligence process is outlined in the sustainability statement, providing details on how the Company applies its key aspects and steps:

Key Elements of Due Diligence	Description	Sections in the Sustainability Statement
a) Embedding due diligence in governance, strategy and business model	ThPA S.A. is planning to embed due diligence into its governance, corporate strategy and business model, with plans in place for formalized policies and board-level oversight. The Company aims to align due diligence processes with business unit KPIs, thus providing a systematic approach to identification and mitigation of risks. Some units already conduct due diligence as part of their operations such as the Procurement Division which assesses suppliers based on the Company's procurement policy, the Human Resources Division which assesses candidate employees based on the recruitment policy, the Legal Affairs Department which performs legal due diligence on customers and suppliers. In addition to this, the Company also follows ISO 37001:2016 standards and strengthens its commitment to transparent practices and anti-bribery, as part of its broader due diligence framework.	<p>GOV-2 – Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies</p> <p>GOV-3 - Integration of sustainability-related performance in incentive</p> <p>SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</p>
b) Engaging with affected stakeholders in all key steps of the due diligence	ThPA S.A. actively engages with stakeholders, including local communities, employees, customers, suppliers, Authorities, and relevant organizations, to understand their views and concerns. This collaboration is essential for identifying and addressing potential negative impacts. By fostering open dialogue, consultations and partnerships, the Company gathers valuable insights to shape strategies and actions that meet stakeholders' needs and expectations.	<p>GOV-2 – Information provided to and sustainability matters addressed by the administrative, management and supervisory bodies</p> <p>SBM-2 – Interests and views of stakeholders</p> <p>IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities</p> <p>SI-2 – Processes for engaging with own workforce and workers' representatives about impacts</p> <p>S3-2 – Processes for engaging with affected communities about impacts</p> <p>S3-4 – Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions</p> <p>S4-2 – Processes for engaging with consumers and end-users about impacts</p> <p>EI-2 – Policies related to climate change mitigation and adaptation</p> <p>E5-1 – Policies related to resource use and circular economy</p> <p>SI-1 – Policies related to own workforce</p> <p>S3-1 – Policies related to affected communities</p> <p>S4-1 – Policies related to consumers and end-users</p> <p>G1-1 – Business conduct policies and corporate culture</p>

Key Elements of Due Diligence	Description	Sections in the Sustainability Statement
c) Identifying and assessing adverse impacts	ThPA S.A. evaluates adverse incidents to understand their causes and effects, adopting a proactive approach to managing due diligence risks. This involves analyzing incidents based on their severity, and likelihood of recurrence. The findings are then compared to predefined standards and regulatory requirements to evaluate performance and compliance. While the Company's risk management system already incorporates aspects of this process, we are dedicated to improving it further. This includes creating detailed procedures to more systematically identify and assess adverse impacts.	<p>IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities</p> <p>SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model</p>
d) Taking actions to address those adverse impacts	ThPA S.A. on a continuous basis is enhancing operational controls, upgrading staff training programs and updating risk management protocols to proactively address possible negative impacts. When impacts have already occurred, the Company implements remediation plans. Additionally, ThPA S.A. collaborates with stakeholders to develop mitigation measures that address their needs effectively.	<p>EI-3 – Actions and resources in relation to climate change policies</p> <p>SI-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those action</p>
e) Tracking the effectiveness of these efforts and communicating	ThPA S.A. is dedicated to improving its due diligence processes by conducting annual reviews, sharing sustainability reports and learning from past experiences. It also works	<p>EI-5 – Energy consumption and mix</p> <p>EI-4 – Targets related to climate change mitigation and adaptation</p> <p>EI-6 – Gross Scopes 1, 2, 3 and Total GHG emissions</p> <p>SI-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities</p>

GOV-5 Risk Management and Internal Controls Over Sustainability Reporting

ThPA S.A. has a Sustainability Committee in place which directly reports to the Executive Chairman of the BoD and a Sustainability and Environmental Strategy Department led by the Director of Sustainability and Environmental Strategy, which ensures the implementation and monitoring of the sustainability policy. ThPA S.A. follows various internationally recognized ISO standards to further strengthen internal controls. The internal control system set up on the basis of the COSO's Internal Control integrated framework aims at the consistent implementation of the business strategy, the efficient use of available resources, the identification and management of sustainability reporting risks, the completeness and reliability of data and information on the financial state of the Company and compliance with regulatory and legislative requirements. ThPA S.A. applies a three-line model of governance where the first line is composed of operational teams responsible for daily managing sustainability related risks, data collection and sustainability reporting, the second line includes the Compliance & Risk Management Officer, the Legal Affairs, Sustainability and Environmental Strategy and Quality, Health & Safety Departments that oversee risk mitigation, while the third line is the Internal Audit Department which provides independent oversight and assurance.

As far as reporting is concerned, the Audit Committee oversees the Sustainability Statement to ensure transparency, compliance, integrity, and confidentiality of the reported data. Internal departments collaborate and collect qualitative and quantitative data under the Sustainability and Environmental Strategy Department's coordination, which ensures completeness, accuracy and alignment with CSRD requirements. Additionally, an independent third-party assurer provides limited assurance to the Sustainability Statement making sure it fully complies with ESRs. The approval process for the non-financial report mirrors that of the financial statements, including review and endorsement by the Sustainability Committee and then by the Audit Committee prior to receiving final approval from the Board of Directors, ensuring the highest level of oversight and accountability.

ThPA S.A. approaches risk management as one of the cornerstones that contribute to corporate governance, effectiveness, and optimal business performance. The organization has adopted a Risk Management Policy and a Risk Management Manual, both approved by the Board of Directors. This framework supports risk identification, risk analysis (qualitative and quantitative), evaluation of risks, risk treatment, risk monitoring and review, and communication and consultation. It is worth mentioning that the prioritization of risks is embedded in the qualitative analysis as well as in the evaluation of risks. The aforementioned steps are described below in detail:

1. Risk Identification

Risk identification is intended to determine the organization's exposure to uncertainty and should therefore be approached in a methodical manner to ensure that all potential risks are identified at this stage. The identification must therefore include all risks regardless of whether or not they are under the control of the management and requires the deepest knowledge of the Company's organization, the market in which it operates, the legal, political and cultural environment.

Some of the key risk identification techniques include:

- **Brainstorming.**
- **Questionnaires.**
- **Business studies that examine each business process and describe the internal processes and external factors that may influence those processes.**
- **Industry benchmarking.**
- **Scenario analysis**
- **Risk assessment workshops**
- **Incident investigation**
- **H.A.Z.O.P. (hazard and operability studies)**

2. Risks Analysis

The risk analysis aims to separate the secondary acceptable risks from the main risks and to provide data that will help in their evaluation and treatment. It involves reasoning about the sources of the risk, the consequences and the likelihood that these consequences will occur. The risks are analyzed based on the combination of the evaluation of the consequences and the likelihood, within the existing safeguards. A preliminary analysis can be performed so that low-impact risks can be ruled out from a more detailed analysis. The analysis continues with the identification of the existing safeguards for control.

Qualitative and Quantitative Risk Analysis

— Qualitative risk analysis is the process of assessing the consequences and likelihood associated with the identified risk elements. This analysis determines the importance and facilitates the prioritization of risk elements according to the potential effects that they may have on the objectives of the project. It provides the way to determine the importance and direction of the reaction to neutralize the negative impact of the risk. The likelihood and magnitude of the effect of the event under analysis allow its evaluation and prioritization.

— The quantitative analysis of the risk aims at the quantitative numerical analysis of the likelihood of each risk to occur, as well as the analysis of the consequences of the event on the objectives of the project and the extension of these consequences to the result of the whole project. Simulation techniques (such as the Monte Carlo method) as well as decision-making techniques are used to:

- Define the chances of success of the various objectives of a project
- Quantify the risks
- Determine the level of costs, time and additional resources needed to address these potential risks
- Identify and classify the risks that require the most attention by quantifying their relative share in the total risks of the project
- Set realistic goals in relation to the risks regarding the cost, time or quality of the final result of a project.

Quantitative analysis generally follows the same procedures as the qualitative analysis previously described.

3. Evaluation of Risks

The risk evaluation involves comparing the level of risk found through the analysis with the risk criteria previously established. When evaluating risks, risk analysis and comparison criteria should be considered on the same basis. Qualitative analysis therefore involves comparing the qualitative level of risk with qualitative criteria and quantitative analysis involves comparing the numerical level of risk with criteria that can be expressed in specific numbers such as destructiveness, frequency or monetary value. The result of the risk evaluation is a list of risks prioritized for further action. The objectives of the organization and the degree of opportunity that may arise from taking the risk must also be taken into account. Decisions must consider the broader context of the risks and the risk tolerance of third parties outside the organization that may benefit from it.



4. Risk Treatment

Risk management includes the range of options for dealing with them, the evaluation of these options, the preparation of plans for dealing with them and their implementation. Any risk management system must include at least the following:

- Effective and efficient operation of the organization.
- Effective internal safeguards.
- Compliance with laws and regulations.

Some of the risk management options include:

— Risk aversion by deciding to stop the activity that is likely to create risks. However, risk aversion can also occur in an inappropriate way due to the tendency of many people to avoid risks, which can increase the importance of other risks. Risk aversion results in:

- Risk aversion decisions, regardless of the information available and the costs incurred in handling them.
- Failure to handle risks.
- Assignment of critical choices or decisions to other parties.
- Postponement of decisions that the organization cannot avoid.
- Taking a choice because it may represent a lower risk, regardless of the benefits.

- Reducing the likelihood of the event.
- Reducing the consequences.
- Transfer of risk. It involves taking the risk or sharing it with a third party. Risk transfer mechanisms include insurance agreements, contracts, and forms of corporate organization such as cooperatives and business ventures. It should be noted, however, that the transfer does not eliminate the risk, as there is still a risk that the organization that undertook it will not be able to manage it effectively.
- Risk retention. All risks, after their reduction or transfer, leave residual risks that are maintained by the organization. Appropriate plans must therefore be drafted to manage the consequences of these risks, should they arise, including the definition of the means of financing them. Risks may also continue to exist due to their failure to be recognized or improperly managed or transferred.
- Reducing the consequences and likelihood of risks is also referred to as risk control. Risk control includes the relative benefit of the new safeguards in relation to the existing controls.





The organization will then need to evaluate the risk management options. Taking the most appropriate option involves balancing the cost of implementing each option with the benefit that results from it. It is clear that options with a large risk reduction that are acquired at relatively low cost must be selected by the organization. However, if the level of risk is high but significant opportunities arise from taking it, then the acceptance of these risks should be based on the evaluation of the cost of dealing with the risk and the cost of repairing the potential consequences in relation to the benefit of these opportunities. In most cases, however, the most appropriate risk management option results from a combination of different options.

After selecting the appropriate risk option, the preparation of the response plan follows. The response plan should include the responsibilities, the plan and the expected output of the risk management, budgets, performance measures and the review process. The response plan should also include mechanisms for evaluating the implementation of the option in relation to performance criteria, individual responsibilities and other objectives, as well as monitoring critical implementation elements.

5. Risk Monitoring and Review

The risks, the effectiveness of the response plan, the strategies and the management system applied to control the implementation need to be monitored to ensure that changing circumstances do not change the priorities of the risks. Ongoing review is important to ensure that management plans are relevant to the risk management objectives. Factors that can affect the likelihood and consequences of an output can vary, as can factors that affect the suitability or cost of different treatment options. Frequent repetition of the risk management cycle is therefore necessary.

6. Communication and Consultation

Communication and consultation are an important element at every stage of the risk management process. It is therefore important to develop a communication plan between internal and external stakeholders that addresses issues related to both the risk and its management process. Effective internal and external communication is important to ensure that those responsible for implementing risk management understand the basis for decision-making and the reason for taking specific action.

Perceptions on risks may differ because of the different assumptions, concepts and needs, issues and concerns of stakeholders related to the risk or the issues under discussion. Since stakeholders can have a significant influence on decision-making, it is important that their perceptions on risk and benefits are recognized and documented.

Risk management is integrated into daily operations to promote a culture of awareness in risk-taking on the one hand and provide scope for improving internal and external communication on the other. The Board of Directors is ultimately responsible for risk management. The Compliance and Risk Management Officer sets the risk-taking framework that corresponds to the company's business strategy, objectives, and values. Furthermore, the company observes changes in legislation and other regulations it should comply with and imposes compliance through remote and on-site inspections. While ThPA S.A. has not yet developed an official dedicated risk assessment approach including a prioritization methodology specifically for sustainability reporting, it acknowledges the importance of integrating sustainability reporting-related risks into its existing risk management framework and plans to address this in future reporting cycles in order to enhance its internal controls and ensure the integrity of the sustainability reporting process.

ThPA S.A. has not identified any risks linked with the sustainability reporting process. Internal control procedures are in place to ensure completion, accuracy and timely availability of data, which are supported by regular reviews and coordination with the appropriate departments.

In case sustainability reporting-related risks or any findings occur during the reporting period, the Compliance & Risk Management Officer ensures they are effectively and promptly shared to relevant departments, facilitating timely corrective actions. This approach fosters a culture of continuous improvement and proactive ESG management. Ongoing monitoring, ensures that possible issues would be addressed, corrective measures would be implemented and progress is tracked to enhance overall sustainability performance.

The Sustainability Team submits findings to Executive Chairman of the BoD every year. ESG performance is published in the Annual Sustainability Report, aligned with CSRD and ESRS requirements. Sustainability risk internal audits are conducted periodically, ensuring continuous improvement and compliance. The Audit Committee monitors the effectiveness of sustainability risk management and ensures transparency in ESG reporting. Any findings related to sustainability reporting risks are formally communicated to the Executive Chairman of the BOD as part of this annual reporting process.



07

STRATEGY

SBM-1 Strategy, Business Model & Value Chain

Description of Significant Groups of Products and (or) Services Offered

ThPA S.A., listed on the Athens Stock Exchange since 2001, operates the Port of Thessaloniki, handling containers, conventional cargo and offering efficient logistics and intermodal services. The Port is a key hub for trade in the Eastern Mediterranean and serves as a direct rail link to Bulgaria, Serbia, and North Macedonia. Additionally, it caters to passenger traffic through cruise and ferry services, with ferry routes to various Greek islands. The Port of Thessaloniki is a designated International Interest port and is part of the Core Network of the Trans-European Transport Network (TEN-T). In 2021, it achieved homeport status for the cruise industry, boosting tourism in Northern Greece.

ThPA S.A. aims to be a leading logistics provider in the Balkans and Southeast Europe, strategically located near major transport networks, with access to over 70 million consumers. The Company focuses on economic growth, sustainability and innovation. ThPA S.A.'s strategy is centered on enhancing the connectivity of the Port of Thessaloniki and expanding ThPA S.A.'s intermodal rail services throughout Southeast and Central Europe, positioning us as a critical player in the region's logistics and transportation network.

ThPA S.A. as a port of International Interest is part of the Core Network of the Trans-European Transport Network (TEN-T). Leveraging its strategic location, the Port boosts local economic activity and tourism, while enhancing its position within the wider European transport network.



• Container Handling:

ThPA S.A. provides a high-quality, integrated container handling system that prioritizes speed and reliability. The Container Terminal (CT) at Pier 6 operates efficiently, meeting the needs of its partners.



• Conventional Cargo Handling:

The Conventional Cargo Terminal (CCT) covers nearly 1,000,000 m² with quays extending 4,000 meters in length and a depth of up to 12 meters. It handles a wide range of cargo using specialized equipment and ample storage. A portion of the terminal is located within the Free Zone, facilitating efficient transit.



• Event Spaces:

ThPA S.A. offers indoor and outdoor spaces at Pier No. 1 for social and cultural events, strengthening the relationship between the Port and the city.



• Parking Areas:

The Port operates two modern outdoor parking areas with a total capacity of 595 spaces near key city locations. These facilities ease city congestion and provide safe, accessible parking for residents, visitors, and transit travelers.



• Project Cargo Handling:

ThPA S.A. offers specialized handling for project cargo, including oversized equipment like wind turbines, compressors, and construction machinery. This service is available at both the Container and Conventional Cargo Terminals.



• Intermodal Rail Services:

The Company provides cost-effective, high-quality intermodal rail services, including direct rail connections between Thessaloniki and Sofia (Bulgaria) and Niš (Serbia). ThPA S.A. partners with leading transport providers for door-to-door solutions and real-time shipment tracking.



• Container Block-Train Service:

In September 2023, ThPA S.A. launched a container block-train service between Thessaloniki and Skopje (North Macedonia), further expanding its intermodal services and strengthening regional connectivity.



• Temporary Customs Storage Services at Sofia and Niš:

ThPA S.A. offers temporary cargo storage at Dry Ports in Sofia and Niš, providing added value by handling cargo for imports and exports, including goods from non-EU countries, thus reducing transport costs, and extending service options.



• Logistics and Real Estate:

Storage services are available inside and outside the Free Zone, ensuring efficient interconnection. This enhances the regional supply chain and fosters development opportunities.



• Cruise & Ferry Operations:

Cruise and ferry services play a crucial role in Northern Greece's tourism. In 2021, the Port of Thessaloniki achieved homeport status, facilitating passenger embarkation and disembarkation. The region offers unique cultural, historical, and gastronomic experiences. In 2024, the Port saw 81 cruise arrivals, marking a 19% increase from 2023. Ferry services connect Thessaloniki to various Greek islands, with the "Makedonia" Passenger Terminal offering 24/7 services just 500 meters from the city center.

According to ThPA S.A.'s financial statements, the revenues generated from both the Container Terminal and Conventional Cargo operations individually contribute more than 10% of the Company's total revenue and thus are regarded significant.

ThPA S.A. promotes sustainable growth by providing services in line with sustainable development principles, especially in the communities in which it operates, although it has not yet set specific, quantified sustainability-related goals. Instead, its Sustainable Development Policy defines key elements, principles, and overarching objectives that guide its activities and strategic decisions, and aims at creating economic value and social surplus, always in accordance with the principles of sustainable development and environmental protection. This Policy has taken into account and voluntarily adopted international standards and principles, with particular emphasis on the "Agenda 2030" of the United Nations (UN) and the 17 Sustainable Development Goals (SDGs), as well as the ATHEX ESG Reporting Guide.

The Policy outlines the following four pillars, that are presented in the relevant sections of the Sustainability Statement, each with corresponding commitments. These pillars constitute the framework for all actions and initiatives related to ESG implementation throughout the Company:

- **Creating Sustainable Value**
- **Environment**
- **Society**
- **Governance**

The Policy's commitments shape ThPA S.A.'s approach to its products and services, ensuring that container handling, conventional cargo operations, logistics, and intermodal services are conducted in an environmentally and socially responsible manner. While formal sustainability targets are yet to be defined, the Company is committed to deploying environmental monitoring mechanisms, reducing its environmental footprint and carbon emissions across its activities, adopting measures for port related operations and in buildings and enhancing the efficient management of natural resources.

Regarding customer categories, ThPA S.A. serves a broad network of shipping companies, logistics providers, and clients, prioritizing service efficiency while promoting sustainability practices. These commitments include the adoption of automation technologies, digitized systems and innovative high-end services to create surplus value for the Company and the port community, the safety of operations and maximized efficiency, productivity and service quality for its customers and partners.

Geographically, ThPA S.A. plays a crucial role in regional trade and thus in regional economic growth generally, particularly by supporting landlocked and neighboring Balkan countries that rely on its infrastructure for access to global markets. Given the strategic location of the Port of Thessaloniki in Northern Greece and the Balkans, ThPA S.A. incorporates the principles of economic growth and business expansion in its strategy and decision-making processes. This approach, combined with sustainability principles, maximizes added value for the Company and its stakeholders, as well as for Thessaloniki, Greece and the broader region. This way, the Port of Thessaloniki functions as "gateway" to growth.

Additionally, ThPA S.A.'s expansion and infrastructure projects—such as the development of piers and terminals—are designed in compliance with national and European environmental regulations. These investments are made with sustainability in mind, ensuring that future operations align with best practices. This approach ensures that the natural resources are used in a sensible manner as well as added value is delivered to the economy and society.

Description of Products and Services that are Banned in Certain Markets

ThPA S.A., the operator of the Port of Thessaloniki, ensures full compliance with international trade regulations and market requirements. There are no prohibited services in certain markets, allowing the port to operate freely in various regions. The Company remains committed to maintaining transparent, legal and ethical business practices, facilitating unrestricted global trade and adhering to the highest industry standards.



Description of Business Model and Value Chain

As ThPA S.A. continues to grow, it remains focused on expanding into emerging sectors and lucrative markets, seizing opportunities in today's dynamic and rapidly changing global environment. ThPA S.A.'s value chain represents an integrated and unified framework for achieving excellence across its diverse activities, which includes port operations, logistics & transport services and sustainability initiatives. This structured model, outlined below, highlights the Company's unwavering commitment to fostering strategic partnerships, optimizing operational efficiency, and driving innovation at every stage of its operations.

Upstream (Supply Chain):

- Materials & Equipment
- Resources (energy, water, fuel)
- Human capital
- Financial capital
- Technical Support Services
- Logistics & Transport Services
- Partnerships

Midstream (Own operations):

- Port Operations regarding cargo handling, vessel docking, storage and automation of operations.
- Maritime and safety services, port security, health and safety for onsite personnel and visitors.
- Infrastructure Development related to expansion projects, sustainable design and maintenance of the current infrastructure.
- Environmental Management regarding waste treatment, monitoring air quality, sea quality and carbon footprint, energy management, compliance with regulations and sustainability programs.
- IT & Communication Services for logistics and cargo tracking and systems for port and vessel coordination.

Downstream:

- Distribution and logistics services
- Value-Added services
- Waste management and environmental services
- Customer relationship and management

ThPA S.A. operates a competitive business model that emphasizes its operations, key resources, customer segments and communication strategies. This model focuses on value creation, with a comprehensive cost analysis and revenue streams aligned with its competitive advantages. The Company is committed to Sustainable Development by integrating eco-social costs and benefits into its operations, addressing areas such as energy use, waste generation and infrastructure upgrades. ThPA S.A.'s competitive edge lies in its strategic location for multi-gateway inter-modal transport in Southeast and Central Europe, supported by skilled personnel, innovative systems and a focus on high-quality services and environmental protection. The Company prioritizes customer relationships, offering reliable, customer-focused solutions and invests in human resource development. Revenue is generated through its operations, with an emphasis on creating value for stakeholders, especially the local community. Key partners include European bodies, public authorities, customers, suppliers and local communities, all of whom are essential to ThPA S.A.'s management and operations.

Due to the Company's business activity, the disclosure requirements regarding revenues in fossil fuel, fossil gas, chemicals, controversial weapons, and tobacco are not applicable.

SBM 2 Interests and Views of Stakeholders

Description of Stakeholder Engagement

A key element of ThPA S.A.'s Sustainability strategy is fostering communication and maintaining an open dialogue with stakeholders, who play a vital role in the Company's operations. ThPA S.A.'s stakeholders are defined as all groups impacted by the Company's activities and those who can influence its decision-making to achieve its objectives. Key stakeholders are customers and clients, employees, investors & shareholders, suppliers & partners, society & communities, and port community & local communities. Views and interests of key stakeholders are continuously discussed internally in the relevant departments and business units, as well as the BoD is informed accordingly to ensure timely action and ongoing development of ThPA S.A.' strategy and business model.

To reinforce this commitment, the Company conducted a Stakeholder Engagement Assessment aligned with international standards, specifically the AccountAbility AA1000 Stakeholder Engagement Standard. This assessment reflects ThPA S.A.'s dedication to actively involving stakeholders in identifying and addressing a wide range of sustainability challenges. Their participation is highly valued, as it is crucial to enhancing the Company's performance in these critical areas.

Description of Categories of Stakeholders for which Engagement Occurs

The Sustainability Team, led by the Director of Sustainability and Environmental Strategy, oversees the application of this Policy within ThPA S.A.'s daily operations. They compile annual reports on the implementation of the Sustainability Policy for the Executive Chairman of the BoD, in accordance with Article 6 of the Policy. The Chairman is responsible for ensuring and evaluating the framework's effectiveness, with a focus on expertise and stakeholder interests.

STAKEHOLDER GROUPS

Employees

Shareholders & Investors

Customers, Shipping & Terminal Operators

Port Community

Media

Suppliers, Contractors & Strategic Partners

Passengers

Financial Institutions & Creditors

Regulatory bodies, Ministries, & Port Authorities

Maritime Sector Associations

NGOs & Civil Society

Research Institutions & Academia

Ports & Terminals

Description of How Stakeholder Engagement is Organized

Engaging with stakeholders is a core aspect of ThPA S.A.'s strategy to enhance transparency and trust while effectively addressing emerging challenges and opportunities. This ensures that the Company's business decisions and actions align with stakeholders' expectations regarding economic, social and environmental matters. The approach to stakeholder engagement varies depending on the stakeholder group and the affected area or/and activity/operation, the engagement is organized by dedicated responsible persons who utilize a mix of informal and formal communication methods and channels to maintain an open dialogue. These employees are responsible for maintaining the open lines of communication with each stakeholder group by using the below multiple channels and methods:



Stakeholder Groups	Communication Channels	Frequency of Engagement
Employees	Reporting & Dialogue Channels, Forums, Working Groups, Fact-Finding Interviews, Intranet, Press Releases, Employee Surveys, Social media	Daily
Shareholders & Investors	General Meeting, Annual & Financial Report, Corporate Website, Press Releases, Participation in Investment Forums, Presentations, Communication Platform	Annually and when necessary
Customers, Shipping & Terminal Operators	Complaint Procedures, Corporate Website, Working Groups, Survey, Newsletters	Daily and when necessary
Port Community	Corporate Website, Press Releases, Port Community Meetings, Social media	Regularly
Media	Corporate Website (Press Releases, Announcements), Networking Events, Briefing Meetings, Social Media, Direct Communication (Email, Telephone)	Frequently
Suppliers, Contractors & Strategic Partners	Meetings, Corporate Website, Social Media, Inspections, Direct Communication, Working Groups	Weekly and when necessary
Passengers	Corporate Website, Social Media, Complaint Form at Passenger Stations	Frequently
Financial Institutions & Creditors	Direct Communication, Financial Statements	Semiannually and when necessary
Regulatory bodies, Ministries, & Port Authorities	Dedicated Meetings, Financial Results, Periodic Reviews	Annually and when necessary
Maritime Sector Associations	Corporate Website, Business Events, Dedicated Meetings, Social Media, Press Releases	Frequently
NGOs & Civil Society	Corporate Website, Social Media, Participation In Events, Sustainability Report, Sponsorships, Meetings with Local Bodies	Frequently and when necessary
Research Institutions & Academia	Meetings, Events, Visits from Universities to the Company, Workshops, Collaboration in Projects, Internships, Sponsorships	When necessary
Ports & Terminals	Corporate Website, Collaboration in Projects	When necessary

For all the categories of stakeholders, engagement is also organized through the double materiality assessment process to analyze and understand stakeholder interests and views.

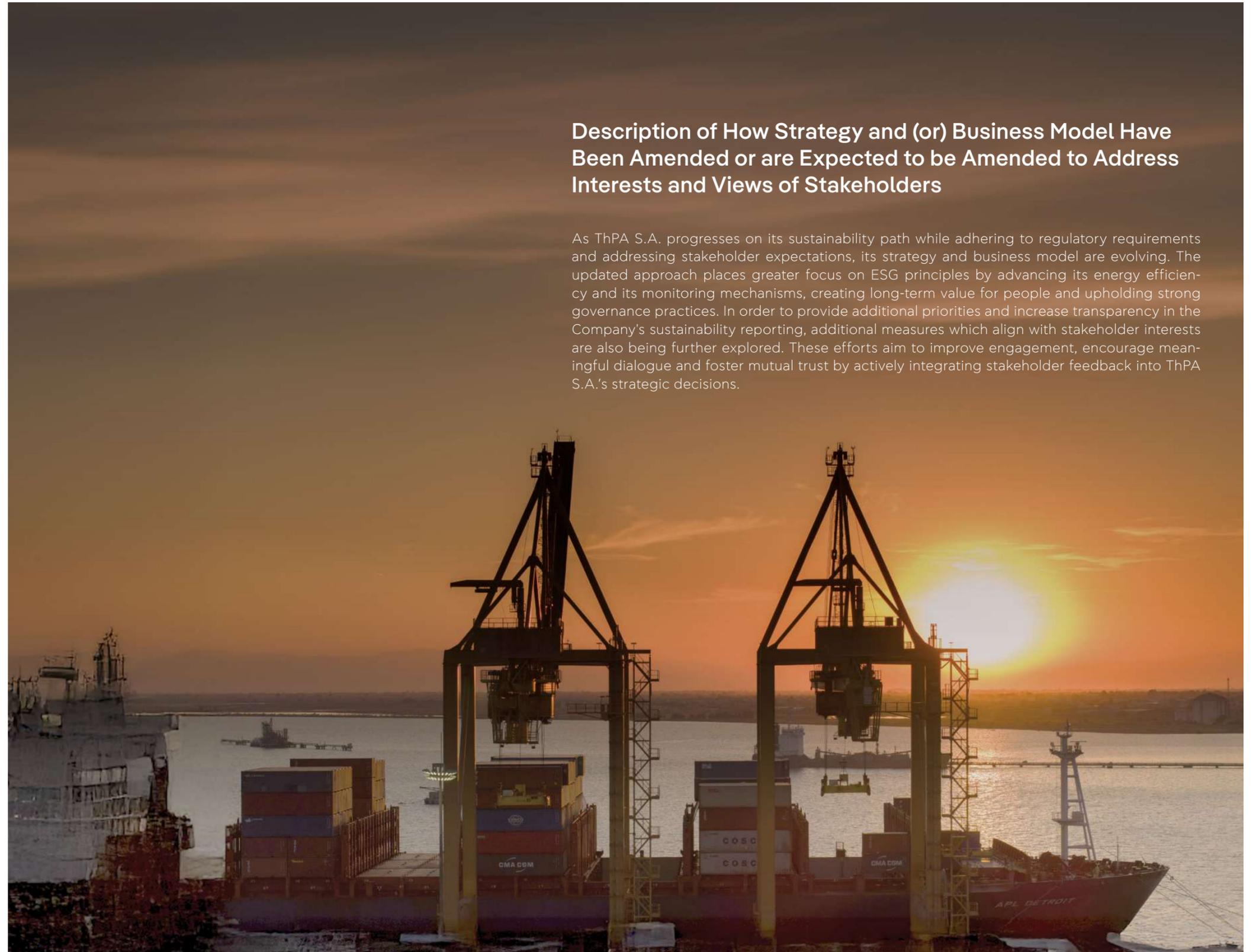
Description of Purpose of Stakeholder Engagement

The purpose of stakeholder engagement is to gather feedback, understand stakeholder concerns, and incorporate their views into the Company's decision-making processes to align with their expectations and enhance overall satisfaction. The stakeholder engagement is fostering growth, driving innovation, and leading with resourcefulness while creating meaningful value for ThPA S.A.'s employees, shareholders, partners and the broader community. Effective stakeholder engagement is essential to the Company's success, as it provides valuable insights through ongoing communication. For instance, engagement with its own employees, is organized through established reporting and dialogue channels, interviews, surveys and the use of intranet. The interests, views and rights of ThPA S.A.'s workforce are regarded fundamental in shaping the Company's strategy and business model. Their perspectives are always taken into consideration, including during the materiality analysis process while the Company is committed to promoting an inclusive working environment and safeguarding the working conditions for all. A similar approach applies to the engagement with customers and end-users: Through complaint procedures, the corporate website and satisfaction surveys, the Company gains valuable insights and its strategy and business model are also informed by a commitment to respecting its customers' human rights, particularly in the areas of privacy and access to quality information.

The Company stays updated on changing needs, expectations and potential risks as perceived by its stakeholders by keeping lines of communication open. Through active collaboration and dialogue, the Company aims to align its efforts with the needs of its region and society, ensuring sustainable progress and shared success. The outcomes of stakeholder engagement are considered by integrating feedback into ThPA S.A.'s policies, strategies and operations. This ensures that the Company remains responsive to stakeholder needs and continuously improves its services and initiatives.

Description of How Strategy and (or) Business Model Have Been Amended or are Expected to be Amended to Address Interests and Views of Stakeholders

As ThPA S.A. progresses on its sustainability path while adhering to regulatory requirements and addressing stakeholder expectations, its strategy and business model are evolving. The updated approach places greater focus on ESG principles by advancing its energy efficiency and its monitoring mechanisms, creating long-term value for people and upholding strong governance practices. In order to provide additional priorities and increase transparency in the Company's sustainability reporting, additional measures which align with stakeholder interests are also being further explored. These efforts aim to improve engagement, encourage meaningful dialogue and foster mutual trust by actively integrating stakeholder feedback into ThPA S.A.'s strategic decisions.





Description of Understanding of Interests and Views of Key Stakeholders as They Relate to Undertaking's Strategy and Business Model

Through this structured stakeholder engagement process, the interests and views of key stakeholders are incorporated into ThPA S.A.'s sustainability strategy. To reinforce its commitments and actions towards sustainable development, the Company's business model is aligned with the needs and expectations of its stakeholders, by understanding and incorporating their perspectives. As ThPA S.A. is evolving its due diligence process and implements a materiality assessment process to analyze and understand stakeholders' interests through the above-mentioned methods, the information collected and the feedback provided contributes to the identification of key themes and issues that are important to stakeholders and any improvement actions, measures and initiatives that are necessary to meet their expectations. By integrating these insights into ThPA S.A.'s business model and strategy, the Company may address any potential material impact, risk and opportunity arise.

Description of How Administrative, Management and Supervisory Bodies are Informed About Views and Interests of Affected Stakeholders with Regard to Sustainability-Related Impacts

The administrative, management, and supervisory bodies are regularly informed and updated about the views and interests of affected stakeholders regarding ThPA S.A.'s sustainability-related impacts from the Sustainability Committee and the Sustainability Team. They both have a key role in reviewing and addressing sustainability-related stakeholder feedback to the highest governance bodies. The Director of Sustainability and Environmental Strategy keeps the Board informed on key ESG issues, including strategic advice and ESG priorities aligned with the Company's wider objectives, while the Team prepares and submits reports regarding the Sustainability Policy implementation for the Executive Chairman of the BoD on an annual basis.

SBM-3 Material Impacts, Risks & Opportunities and their Interaction with Strategy & Business Model

Description of Material Impacts Resulting from Materiality Assessment

In the following tables, the IROs that were identified and assessed as material in ThPA S.A.'s DMA are listed, i.e. they were scored with 'significant' level of materiality. Each IRO relates to specific ESRS topic and has a detailed description. For impacts, the Table shows whether they contribute positively or negatively, if they are actual and potential, or both, their identified time horizon and where in ThPA S.A.'s own operations ("OO") and its upstream ("Upstream") and downstream ("Downstream") value chain these material impacts are concentrated. More information on each IRO, including how ThPA S.A. manages them, is included in the topical sections under 'Environment', 'Social', and 'Governance'.

ESRS Sub-Topic	E1. CLIMATE CHANGE MITIGATION
Initiative Action Decision Fact	ThPA S.A is implementing a series of planned actions to achieve significant emission reductions, including the installation of photovoltaic panels across warehouses to create a net-zero energy consumption balance, transitioning to hybrid equipment, and sourcing more environmentally friendly machinery. Specifically, eight machines responsible for the largest share of diesel consumption will be replaced with hybrid technology, leading to a substantial reduction in liquid fuel use.
Impact	These initiatives support sustainable development by reducing greenhouse gas emissions and dependence on fossil fuels, contributing to climate change mitigation. The installation of photovoltaic panels will lower the port's carbon footprint and enhance energy security. Additionally, replacing diesel-powered machines with hybrid technology will significantly decrease liquid fuel consumption and air pollution, creating a healthier environment for nearby communities and ecosystems.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E1. CLIMATE CHANGE MITIGATION
Initiative Action Decision Fact	ThPA S.A is in the process of compiling a comprehensive climate transition plan that will unify all the existing efforts and actions towards climate change mitigation and decarbonization. While further strategic targets and a dedicated climate change strategy for reducing Scope 1 and 2 emissions are areas for future focus, ThPA S.A. remains committed to meeting its obligations under the National Climate Law, which requires the establishment of specific targets and ensures compliance with existing legislation.
Impact	Without such a plan, ThPA S.A risks missing key opportunities for emissions reductions and may delay essential actions needed to combat climate change. To effectively contribute to global climate goals, it is imperative for ThPA S.A. to develop a detailed strategy that goes beyond emissions monitoring, incorporating targeted actions for long-term sustainability.
	Negatively
	Actually and Potentially
Time Horizon	Mid-term
Value Chain	∞

ESRS Sub-Topic	E1. ENERGY
Initiative Action Decision Fact	ThPA S.A. consumes substantial energy, primarily in the form of diesel fuels, to operate heavy-duty equipment for loading, unloading and transporting cargo, as well as to support its broader infrastructure and port operations.
Impact	ThPA S.A.'s use of fossil fuels contributes to greenhouse gas emissions, impacting climate change. Shifting to renewable energy sources would reduce its carbon footprint and align with global sustainability goal.
	Negatively
	Actually and Potentially
Time Horizon	Mid-term
Value Chain	∞

ESRS Sub-Topic	E1. ENERGY
Initiative Action Decision Fact	ThPA S.A. is implementing several energy efficiency initiatives, including replacing high-pressure sodium lamps with LED lighting in outdoor masts, conducting targeted training for employees on machinery and vehicle use and completing a building energy retrofit study, with recommendations currently under discussion. Additionally, electricity analyzers have been installed on four cranes, and plans are underway to purchase new ground equipment with high energy efficiency. The Company is using the ABB Ability software for measuring electric energy consumption using telemetric equipment in the Container Terminal.
Impact	These initiatives support sustainable development by reducing energy consumption and greenhouse gas emissions, enhancing operational efficiency. Training employees fosters better resource use, while the building retrofit study aims to optimize energy efficiency in facilities, demonstrating ThPA S.A.'s commitment to sustainability.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E3. MARINE RESOURCES
Initiative Action Decision Fact	ThPA S.A. has established response plans for marine pollution emergencies related to hazardous chemicals and petroleum products. These are promptly addressed using absorbent materials, with contaminated waste managed by licensed waste partners.
Impact	These initiatives support sustainable development by reducing greenhouse gas emissions and dependence on fossil fuels, contributing to climate change mitigation. The installation of photovoltaic panels will lower the port's carbon footprint and enhance energy security. Additionally, replacing diesel-powered machines with hybrid technology will significantly decrease liquid fuel consumption and air pollution, creating a healthier environment for nearby communities and ecosystems.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E3. MARINE RESOURCES
Initiative Action Decision Fact	ThPA S.A. implements an biannual water anti-pollution drill in collaboration with the harbor authority, ensuring the protection of local marine environments. The port conducts seawater quality monitoring every six months to assess the impact of its operations. Small scale sea pollution incidents that may occur are being tackled successfully according to the requirements of the Emergency Plan ensuring minimal impact on the local ecosystems.
Impact	ThPA S.A.'s proactive water anti-pollution plan and regular seawater monitoring significantly contribute to sustainable development by safeguarding marine ecosystems and maintaining seawater quality in the port area. The preparedness of tackling small scale pollution incidents that may occur reflect the effectiveness of these measures and reinforces the port's commitment to environmental stewardship, fostering a healthier marine environment for local wildlife and communities.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E3. MARINE RESOURCES
Initiative Action Decision Fact	ThPA S.A. conducts biannual seawater quality measurements and annual noise assessments, in accordance with its approved environmental terms. These measurements are performed in collaboration with external laboratories. Additionally, Environmental Impact Assessments are carried out prior to any port expansion investments to ensure the protection of marine ecosystems.
Impact	Regular monitoring of seawater quality and noise levels contributes to sustainable development by safeguarding local ecosystems and minimizing environmental disturbances. The commitment to conducting Environmental Impact Assessments before expansion projects further ensures that potential impacts on the environment are identified and mitigated, promoting responsible development practices.
	Positively
	Actually and Potentially
Time Horizon	Short-term
Value Chain	∞

ESRS Sub-Topic	S1. EQUAL TREATMENT AND OPPORTUNITIES FOR ALL
Initiative Action Decision Fact	ThPA S.A.'s recruitment policy, promotes inclusivity by considering candidates with disabilities and ensures transparency and meritocracy through structured hiring practices. All job openings are posted on its website, supporting fair selection processes that align with the Company's vision and strategic goals.
Impact	By fostering an inclusive workplace, the policy helps reduce inequalities and promotes social inclusion, contributing to a more equitable society.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	SI. EQUAL TREATMENT AND OPPORTUNITIES FOR ALL
Initiative Action Decision Fact	ThPA S.A. has achieved a relatively high representation of women (20%) in white-collar roles, such as back-office positions, which is notable for the port industry. However, women remain underrepresented in blue-collar roles, including dockworking and machinery operation—a gap the Company is committed to addressing in the coming years.
Impact	Limited female representation in ThPA's blue-collar roles presents challenges to fostering a diverse and inclusive workplace, potentially impacting workplace culture and reducing diverse perspectives in operational areas. This gender imbalance also risks talent shortages by not fully utilizing the female workforce for operational roles, potentially affecting productivity.
	Negatively
	Actually and Potentially
Time Horizon	Short-term
Value Chain	∞

ESRS Sub-Topic	SI. EQUAL TREATMENT AND OPPORTUNITIES FOR ALL
Initiative Action Decision Fact	ThPA S.A. has a policy to prevent and address workplace violence and harassment, in line with a European Directive. It includes a whistleblowing mechanism for both violence/harassment and unethical behavior, with designated persons responsible for handling complaints. This information is available on the website.
Impact	By promoting and fostering a culture of respect and a safe working environment, the Company enhances its social responsibility and builds a positive workplace culture, ultimately leading to improved employee morale and productivity.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	SI. OTHER WORK-RELATED RIGHTS
Initiative Action Decision Fact	ThPA S.A. follows all labor laws and regulations outlined by the EU Directives, ensuring compliance with international standards and human rights guidelines, such as the UN Guiding Principles on Business and Human Rights. So far, there have been no instances of human rights violations, but a process for incident reporting is in place, with reports presented to the Board of Directors.
Impact	With its compliance to human rights guidelines and the implementation of mechanisms for incident reporting, the port reduces potential human rights risks, strengthens stakeholder trust and supports transparency and accountability in its operations.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	SI. OTHER WORK-RELATED RIGHTS
Initiative Action Decision Fact	The Company complies with GDPR standards to ensure the security of employees' personal data, both in printed and electronic form. Additionally, it adheres to ISO 27001:2022, which strengthens its approach to information security, cybersecurity and privacy protection.
Impact	This commitment ensures robust data protection measures, safeguarding sensitive information and mitigating risks related to data breaches, while maintaining compliance with both privacy regulations and international security standards. equitable society.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. OTHER WORK-RELATED RIGHTS
Initiative Action Decision Fact	ThPA S.A. maintains a detailed code of ethics outlining business principles and ethical standards, which includes a strict prohibition against child and forced labor, a commitment also reinforced in all supplier contracts.
Impact	Prohibiting child and forced labor and reinforcing this in supplier contracts significantly supports societal sustainability by protecting children's rights and promoting ethical labor practices.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. WORKING CONDITIONS
Initiative Action Decision Fact	At ThPA S.A., all employees receive at least the minimum wage, as well as a range of additional benefits depending on their positions. These benefits include private healthcare, life insurance, meal vouchers and discounts. ThPA S.A. fully complies with legal requirements for all types of leave, including maternity and parental leave, ensuring employee rights are upheld.
Impact	ThPA S.A.'s commitment to fair wages, comprehensive benefits, and adherence to legal leave requirements fosters social equity and well-being among employees. This approach aligns with sustainable development goals related to decent work and economic growth.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. WORKING CONDITIONS
Initiative Action Decision Fact	ThPA S.A. records and thoroughly investigates all types of accidents, notifying the Labor Inspectorate and Port Authority as required. All incidents are documented and assessed, providing the foundation for generating key safety indicators. With ISO 45001 certification in place, the Company upholds a robust health and safety policy, ensuring that all employees are well-informed and committed to maintaining a safe working environment.
Impact	Having ISO 45001 certification and comprehensive health and safety procedures promotes societal sustainability by protecting employees in the value chain and ensuring safer working conditions. This proactive approach supports the well-being of workers, benefiting neighboring communities and fostering a culture of safety and compliance.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1.WORKING CONDITIONS
Initiative Action Decision Fact	ThPA S.A has a comprehensive mechanism in place to monitor and track working hours, ensuring that overtime is closely monitored and accurately recorded. Regular reviews of working hours also enable the Company to identify potential issues early, optimize workforce management and ensure fair compensation for overtime worked.
Impact	This system helps prevent excessive overtime, promoting a healthier work-life balance for employees. By reducing burnout and supporting overall well-being, it enhances employee satisfaction, boosts morale and drives higher productivity.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. WORKING CONDITIONS
Initiative Action Decision Fact	ThPA S.A.'s operations involve heavy machinery, high traffic zones and hazardous cargo handling, exposing workers to significant physical risks.
Impact	High-risk working conditions, including exposure to heavy machinery and hazardous materials, lead to increased chances of accidents and injuries.
	Negatively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S3. COMMUNITIES' CIVIL AND POLITICAL RIGHTS
Initiative Action Decision Fact	ThPA S.A. actually supports freedom of expression and encourages open communications with the local community. The port has established an inclusive Port Community body, ensuring representation from a wide range of stakeholders, to enable local organizations and residents to engage with the Company on legislative changes, operational updates and investment projects that may impact the community, fostering dialogue and collaborative insights on various port-related matters.
Impact	By regularly engaging with local stakeholders, the port enhances community participation in decision-making processes and supports sustainable communities, as local concerns and expectations are acknowledged and integrated into the Company's operations. The transparency also fosters trust between the port and the community, integrating the port as a vital part of Thessaloniki.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	S3. COMMUNITIES' CIVIL AND POLITICAL RIGHTS
Initiative Action Decision Fact	ThPA S.A. actively supports education-focused initiatives, scholarships and educational environmental awareness programs. Collaborating with NGOs supports underserved communities and sponsors events to promote inclusivity. This engagement involves economic, social and cultural support.
Impact	By collaborating with NGOs and providing educational opportunities, the port strengthens social equity, aligns with human rights goals, and supports its community ties. These initiatives enhance the social pillar of sustainability, emphasizing community empowerment through economic, social and cultural contributions.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	S4. INFORMATION-RELATED IMPACTS FOR CONSUMERS AND/OR END-USERS
Initiative Action Decision Fact	ThPA S.A. enforces strict access control over consumer data, limiting access to authorized users only and ensuring data privacy through a dedicated GDPR policy, with privacy statements for each department. There are external interface platforms and the IT department rigorously enforces security protocols. While no data incidents have occurred, comprehensive measures are in place to mitigate risks should any arise.
Impact	Prioritizing consumer data privacy and aligning with GDPR's principles, enhances consumer trust and demonstrates a commitment to safeguarding personal information.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	S4. INFORMATION-RELATED IMPACTS FOR CONSUMERS AND/OR END-USERS
Initiative Action Decision Fact	ThPA S.A. actively promotes customer freedom of expression by maintaining open communication channels. It conducts an annual customer survey, covering all aspects of its services and aligned with ISO standards, to gather valuable feedback. Any incidents that occur are documented, monitored and escalated to the relevant department for resolution. A registry is maintained to record all customer interactions, ensuring continuous improvement in service response.
Impact	By monitoring and addressing customer concerns, the port enhances transparency and accountability, which strengthens trust between the Company and its customers and helps build stronger relationships with stakeholders.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	S4. INFORMATION-RELATED IMPACTS FOR CONSUMERS AND/OR END-USERS
Initiative Action Decision Fact	ThPA S.A. handles daily communication with stakeholders and port users via phone and email, with any complaints directed to customer service for resolution. All issues, including those like gate delays, are recorded and addressed. QR codes and forms allow easy access for port users to contact customer service or specific departments, with a user-friendly website ensuring seamless service.
Impact	ThPA S.A.'s efficient communication and complaint resolution processes improve customer satisfaction and trust, fostering long-term client relationships. By addressing issues promptly and transparently, the port enhances its service quality.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	S4. PERSONAL SAFETY OF CONSUMERS AND/OR END-USERS
Initiative Action Decision Fact	ThPA S.A. has established comprehensive policies and regulations to ensure the safety of all contractors, suppliers & port users within its port facilities, in full compliance with national regulations. These include signed agreements, documented procedures and mandatory certifications. Strict safety protocols and risk assessments are consistently enforced, with internal inspectors overseeing safety measures. The Company maintains relevant certifications to ensure ongoing compliance and the highest safety standards across its operations.
Impact	ThPA S.A. aligns with responsible labor practices, by prioritizing workplace health and safety for contractors, suppliers & port users. Enhanced safety protocols, particularly in high-risk areas like port facilities, promote community well-being and minimize potential harm to individuals and communities.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Upstream/ Downstream

ESRS Sub-Topic	G1. CORPORATE CULTURE
Initiative Action Decision Fact	ThPA S.A. has implemented several publicly available policies to ensure strong governance and sustainability in line with corporate culture. These include a recently updated sustainability policy, a conflict of interest policy with clear documentation procedures for executives, and policies on energy management, environmental protection, health and safety (ISO 45001 certified) and cybersecurity. The Company also adheres to an established Code of Ethics, which integrates sustainability aspects like responsible economic practices.
Impact	ThPA S.A.'s comprehensive governance policies enhance transparency, accountability, and ethical conduct across the organization.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	G1. CORRUPTION AND BRIBERY
Initiative Action Decision Fact	ThPA S.A holds ISO 37001:2016 certification, recently renewed, and has updated its anti-bribery and whistleblowing policies. These policies include a clear procedure for handling incidents and a reporting channel that protects whistleblower anonymity. To date, no corruption or bribery incidents have been reported.
Impact	These measures contribute positively to sustainable development by promoting ethical business practices, enhancing transparency and fostering trust among stakeholders.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Upstream / Downstream

ESRS Sub-Topic	G1. CORRUPTION AND BRIBERY
Initiative Action Decision Fact	ThPA S.A. has established measures to prevent and detect corruption and bribery, including the preparation of training materials for staff. These materials are complemented by a poster that reinforces the principles outlined in the relevant policy manual, ensuring employees are informed and aligned with the Company's anti-corruption stance.
Impact	By equipping employees with knowledge of anti-corruption practices, ThPA S.A. fosters an ethical workplace culture that minimizes the risk of unethical behavior.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Upstream

ESRS Sub-Topic	G1. MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS INCLUDING PAYMENT PRACTICES
Initiative Action Decision Fact	ThPA S.A. has implemented a policy regarding late payments from/to suppliers, which is embedded within supplier contracts. The policy includes detailed clauses to ensure clear terms on payment timelines and responsibilities, providing a consistent framework for managing delayed payment scenarios across supplier relationships.
Impact	By managing delayed payments and clearly defining payment responsibilities within supplier contracts, the port contributes to economic sustainability, fosters trust and financial stability within the supply chain.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	Upstream

ESRS Sub-Topic	G1. MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS INCLUDING PAYMENT PRACTICES
Initiative Action Decision Fact	ThPA S.A actively fosters local economic development by prioritizing partnerships with businesses and SMEs in the Thessaloniki and Central Macedonia regions, even when these collaborations may come at a higher cost. Each partnership is carefully documented to ensure transparency and accountability in their operations.
Impact	By focusing on the local market first, the port demonstrates a commitment to boosting the local economy, contributing to job creation and supporting regional development, benefiting both community stability and business resilience in the region.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Upstream

ESRS Sub-Topic	G1. MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS INCLUDING PAYMENT PRACTICES
Initiative Action Decision Fact	ThPA S.A. is actively developing an updated database to assess and rate suppliers, aligning the ratings with international market standards. Vendor management is a key focus in their strategy, with ongoing improvements aimed at optimizing the use of these databases for more effective supplier evaluation.
Impact	By prioritizing suppliers who meet high ESG standards, the port encourages sustainability across its supply chain. This strategy helps reduce environmental impact, supports social responsibility, and fosters ethical governance practices.
	Positively
	Potentially
Time Horizon	Mid-term
Value Chain	Upstream

ESRS Sub-Topic	G1. POLITICAL ENGAGEMENT
Initiative Action Decision Fact	ThPA S.A. actively engages in lobbying for its investments through various channels, including office visits and outreach initiatives. These efforts also include organizing and funding strategic conferences on an annual basis to support and promote its projects and goals.
Impact	ThPA S.A.'s proactive lobbying efforts can drive economic growth by attracting investments and supporting strategic initiatives, fostering collaboration that can lead to innovative solutions and job creation thus ultimately benefiting local sustainable development.
	Positively
	Potentially
Time Horizon	Long-term
Value Chain	∞ / Upstream / Downstream

ESRS Sub-Topic	G1. POLITICAL ENGAGEMENT
Initiative Action Decision Fact	The Executive Chairman of ThPA S.A. – Port of Thessaloniki is also the President of ELIME (Hellenic Ports Association), and the representative of Greece in the European Sea Ports Organization (ESPO). The Executive Chairman also manages relationships with all port and shipping related Associations and Organizations, such as the Hellenic Chamber of Shipping. Additionally, the port serves on the governing committee of the Exporters Association of Northern Greece, on the national cruise committee, MedCruise Association - the Mediterranean Cruise Ports, among other associations.
Impact	The port's involvement in various organizations promotes collaboration and strategic initiatives that can enhance the sustainability of the cruise sector. By addressing national cruise strategy and engaging with Mediterranean ports, this role supports environmentally responsible tourism and regional development.
	Positively
	Actually and Potentially
Time Horizon	Short-term
Value Chain	∞ / Upstream / Downstream

ESRS Sub-Topic	G1. PROTECTION OF WHISTLE-BLOWERS
Initiative Action Decision Fact	ThPA S.A. has a Whistleblowing mechanism that ensures anonymity, with reports made via a special form on the website, phone, in writing or in person. Whistleblowers can choose not to provide personal details, and their identity is protected, even in face-to-face meetings. Retaliation is prohibited. The Compliance department handles investigations following a documented procedure in the complaint management manual. The system is open to employees and partners, promoting a culture of transparency and integrity.
Impact	The Whistleblowing mechanism fosters a culture of transparency and integrity within the organization. By encouraging reporting without fear of retaliation, it empowers all stakeholders to act ethically, thereby enhancing trust and accountability.
	Positively
	Actually and Potentially
Time Horizon	Long-term
Value Chain	∞ / Downstream

Description of Material Risks and Opportunities Resulting from Materiality Assessment

Out of the identified financial Risks and Opportunities, 26 were deemed material across the following ESRS sub-topics: E1. Climate change mitigation, E.1 Energy, E3. Marine resources, E5. Resource outflows related to products and services, S1. Equal treatment and opportunities for all, S1. Other work-related rights, S1. Working conditions, S3. Communities' civil and political rights, S.4 Information-related impacts for consumers and/or end-users, S.4 Personal safety of consumers and end-users, G1. Corruption culture, G1. Corruption and bribery, G1. Management of relationships with suppliers including payment practices, G1. Protection of whistleblowers. The Table below presents and describes in detail the material ROs, their identified time horizon and where in ThPA S.A.'s own operations ("OO") and its upstream ("Upstream") and downstream ("Downstream") value chain these material risks and opportunities are concentrated:

ESRS Sub-Topic	E1. CLIMATE CHANGE MITIGATION
Initiative Action Decision Fact	The port has implemented an Environmental Management System (EMS) for all its port activities, which is certified according to the International Standard ISO 14001:2015. Additionally, it has an Energy Management System (EnMS) in compliance with the requirements of the ISO 50001:2018 standard.
Risk/ Opportunity	Achieving these certifications can enhance operational efficiency and reduce energy and waste management costs. It can also strengthen market competitiveness, potentially attracting environmentally conscious investors and customers and may lead to lower insurance premiums due to improved risk management practices. Conversely, any violations related to environmental protection can result in substantial financial penalties and exclusion from bidding on future projects. Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E1. CLIMATE CHANGE MITIGATION
Initiative Action Decision Fact	ThPA S.A. is also in the process of compiling a comprehensive climate transition plan that will unify all the existing efforts and actions towards climate change mitigation and decarbonization. Strategic targets and a dedicated climate change strategy for reducing Scope 1 and 2 emissions are areas for future focus. ThPA S.A. remains committed to meeting its obligations under the National Climate Law, requiring the establishment of specific targets and ensures compliance with existing legislation. ThPA S.A. is certified according to ISO14064-1:2018 Greenhouse gases for Scope 1 and 2 emissions.
Risk/ Opportunity	The absence of a dedicated climate transition plan and detailed decarbonization goals can undermine investor confidence and limit access to sustainability-focused investments. This lack of strategic direction may result in missed opportunities for financial incentives tied to emission reductions and hinder the Company's long-term financial resilience. Risk
Time Horizon	Mid-term
Value Chain	∞

ESRS Sub-Topic	E1. ENERGY
Initiative Action Decision Fact	ThPA S.A. consumes substantial energy, primarily in the form of diesel fuels, to operate heavy-duty equipment for loading, unloading, and transporting cargo, as well as to support its broader infrastructure and port operations.
Risk/ Opportunity	The high energy consumption, particularly from fossil fuels, impacts enterprise value by leading to increased operational costs and exposing the Company to potential future regulations aimed at carbon emissions reductions. Transitioning to energy-efficient or renewable sources can reduce these costs over time and improve operational efficiency. Risk
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E1. ENERGY
Initiative Action Decision Fact	ThPA S.A. has installed an electricity consumption monitoring system at its highest energy-consuming substation, which monitors individual energy consumption with remote control, ensuring continuous monitoring. Consequently, electricity usage is tracked through the system and monthly billings. Additionally, there is an internal metering system for tenants.
Risk/ Opportunity	This continuous monitoring can present significant financial opportunities, as optimizing energy consumption may result in lower utility costs and enhance the port's sustainability profile.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E1. ENERGY
Initiative Action Decision Fact	ThPA S.A. is implementing several energy efficiency initiatives, including replacing high-pressure sodium lamps with LED lighting in outdoor masts, conducting targeted training for employees on machinery and vehicle use, and completing a building energy retrofit study, with recommendations currently under discussion. Additionally, electricity analyzers have been installed on four cranes and plans are underway to purchase new ground equipment with high energy efficiency. The Company is also using the ABB Ability software for measuring energy consumption using telemetric equipment in the Container Terminal.
Risk/ Opportunity	By lowering energy costs and implementing advanced energy management technologies, these initiatives enhance ThPA S.A.'s enterprise value. The shift to LED lighting and efficient equipment leads to significant savings, while sustainable practices improve the Company's reputation, attracting environmentally conscious clients and investors.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E1. ENERGY
Initiative Action Decision Fact	ThPA S.A. operates an internal fueling station for liquid fuels, equipping all liquid fuel-dependent equipment—including vehicles and boilers—with monitoring rings. This system allows for detailed tracking of fuel consumption for each vehicle, enabling the identification of inefficiencies and areas for improvement.
Risk/ Opportunity	The ability to monitor and optimize fuel consumption directly impacts ThPA S.A.'s enterprise value by reducing operational costs associated with fuel expenditures. By identifying inefficiencies and implementing improvements, the port can achieve significant cost savings over time.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E3. MARINE RESOURCES
Initiative Action Decision Fact	ThPA S.A. has established response plans for marine pollution emergencies related to hazardous chemicals and petroleum products. These are promptly addressed using absorbent materials, with contaminated waste managed by licensed waste partners.
Risk/ Opportunity	The proactive management of pollution risks enhances ThPA S.A.'s reputation as a responsible operator. This commitment to environmental stewardship can foster stakeholder trust, reduce potential regulatory fines and mitigate liability risks, ultimately supporting the port's long-term operational sustainability and enterprise value.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E3. MARINE RESOURCES
Initiative Action Decision Fact	ThPA S.A. implements a biannual water anti-pollution drill in collaboration with the harbor authority, ensuring the protection of local marine environments. The port conducts seawater quality monitoring every six months to assess the impact of its operations. Small scale sea pollution incidents that may occur are being tackled successfully according to the requirements of the Emergency Plan ensuring minimal impact on the local ecosystems.
Risk/ Opportunity	The implementation of a robust water anti-pollution plan enhances ThPA S.A.'s enterprise value by mitigating risks associated with environmental compliance and potential liabilities. By preventing pollution incidents and demonstrating accountability in water quality management, the port bolsters its reputation as a responsible operator, increasing trust among stakeholders, clients and regulatory bodies.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E5. RESOURCE OUTFLOWS RELATED TO PRODUCTS AND SERVICES
Initiative Action Decision Fact	ThPA S.A. ensures responsible management of all port-generated waste by collecting materials and delivering them to licensed companies for proper processing, primarily recycling, in line with circular economy principles. The Company has set up waste collection points within the port and utilizes its own vehicles to transport non-hazardous solid waste from land-based facilities to appropriate storage, treatment, or landfill sites.
Risk/ Opportunity	By effectively managing waste and complying with regulatory requirements, ThPA S.A. enhances its reputation as a responsible operator. This commitment attracts environmentally conscious clients and partners, reduces the risk of regulatory penalties, and can lead to cost savings through improved operational efficiencies, ultimately bolstering the Company's enterprise value.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	E5. RESOURCE OUTFLOWS RELATED TO PRODUCTS AND SERVICES
Initiative Action Decision Fact	ThPA S.A. is certified under ISO 14001 and actively implements a comprehensive waste management system. Waste is categorized into two primary types: 1) Ship waste, which, while not classified as the port's responsibility, is managed and closely monitored by ThPA S.A.; and 2) Waste generated from the port's own operations, for which the Company has established partnerships with various organizations to ensure effective management.
Risk/ Opportunity	This proactive approach not only reduces the risk of regulatory penalties but also positions ThPA S.A. as a responsible and sustainable operator, which can attract environmentally conscious customers and partners, ultimately bolstering its enterprise value.
	Opportunity
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	S1. EQUAL TREATMENT AND OPPORTUNITIES FOR ALL
Initiative Action Decision Fact	ThPA S.A. provides accessibility for office positions through elevators, ramps, specialized equipment, and computers to support employees with diverse needs. However, improvements are needed, such as additional resources for visually impaired individuals, to create a fully inclusive work environment.
Risk/ Opportunity	Strong inclusivity may lead to higher employee satisfaction and retention rates, which can improve workforce stability and reduce recruitment costs over time.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	SI. EQUAL TREATMENT AND OPPORTUNITIES FOR ALL
Initiative Action Decision Fact	ThPA S.A. currently lacks a formal performance evaluation process. A new system has been developed and is pending board approval, with implementation scheduled to begin in 2025.
Risk/ Opportunity	This lack of structured assessment can hinder employee development, reduce motivation and impact overall productivity. Additionally, without clear performance metrics, it becomes challenging to align individual contributions with organizational goals, potentially impacting ThPA S.A.'s operational efficiency and long-term strategic growth.
	Risk
Time Horizon	Short-term
Value Chain	∞

ESRS Sub-Topic	SI. OTHER WORK-RELATED RIGHTS
Initiative Action Decision Fact	ThPA S.A. follows all labor laws and regulations outlined by the EU Directives, ensuring compliance with international standards and human rights guidelines, such as the UN Guiding Principles on Business and Human Rights. So far, there have been no instances of human rights violations, but a process for incident reporting is in place, with reports presented to the Board of Directors.
Risk/ Opportunity	This commitment reduces legal risks related to human rights compliance while offering an opportunity to strengthen stakeholder trust and attract partnerships aligned with social responsibility values.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	SI. EQUAL TREATMENT AND OPPORTUNITIES FOR ALL
Initiative Action Decision Fact	ThPA S.A. has a policy to prevent and address workplace violence and harassment, in line with a European Directive. It includes a whistleblowing mechanism for both violence/harassment and unethical behavior, with designated persons responsible for handling complaints. This information is available on the website.
Risk/ Opportunity	In terms of enterprise value, these policies enhance the Company's reputation, build trust with employees, and attract talent. A safe, respectful workplace reduces the risk of legal issues and operational disruptions, leading to improved employee retention, morale, and performance.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	SI. OTHER WORK-RELATED RIGHTS
Initiative Action Decision Fact	The Company complies with GDPR standards to ensure the security of employees' personal data, both in printed and electronic form. Additionally, it adheres to ISO 27001:2022, which strengthens its approach to information security, cybersecurity, and privacy protection.
Risk/ Opportunity	By adhering to GDPR standards, the Company reduces the likelihood of costly data breaches and associated legal fees, fines, and compensation payments.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. OTHER WORK-RELATED RIGHTS
Initiative Action Decision Fact	ThPA S.A. maintains a detailed code of ethics outlining business principles and ethical standards, which includes a strict prohibition against child and forced labor, a commitment also reinforced in all supplier contracts.
Risk/ Opportunity	Adhering to ethical standards, such as prohibiting child labor, can enhance ThPA S.A.'s reputation and brand value, potentially leading to increased customer loyalty and investor confidence. This ethical stance can also mitigate risks associated with legal penalties, negative publicity, and potential boycotts, thereby safeguarding the financial health and long-term profitability.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. WORKING CONDITIONS
Initiative Action Decision Fact	ThPA S.A. records and thoroughly investigates all types of accidents, notifying the Labor Inspectorate and Port Authority as required. All incidents are documented and assessed, providing the foundation for generating key safety indicators. With ISO 45001 certification in place, the Company upholds a robust health and safety policy, ensuring that all employees are well-informed and committed to maintaining a safe working environment.
Risk/ Opportunity	Implementing robust health and safety measures can reduce workplace incidents, lowering associated costs such as medical expenses and lost productivity. These practices also enhance the Company's reputation, making it more attractive to investors and clients concerned with social responsibility, potentially leading to increased business opportunities and financial stability.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. WORKING CONDITIONS
Initiative Action Decision Fact	At ThPA S.A., all employees receive at least the minimum wage, as well as a range of additional benefits depending on their positions. These benefits include private healthcare, life insurance, meal vouchers and discounts. ThPA S.A. fully complies with legal requirements for all types of leave, including maternity and parental leave, ensuring employee rights are upheld.
Risk/ Opportunity	A robust benefits policy makes the Company more attractive to potential employees and improves retention among existing staff. High-quality benefits are especially valued by talent and contribute to a positive workplace culture, reducing turnover costs and fostering loyalty.
	Opportunity
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S1. WORKING CONDITIONS
Initiative Action Decision Fact	ThPA S.A.'s operations involve heavy machinery, high traffic zones, and hazardous cargo handling, exposing workers to significant physical risks
Risk/ Opportunity	This has the potential to result in serious incidents, legal liabilities, and increased worker compensation claims due to potential inadequate safety practices. By continuously prioritizing safety protocols and worker training ThPA S.A. could avoid any potential regulatory penalties, enhance worker morale and improve employee retention.
	Risk
Time Horizon	Long-term
Value Chain	∞

ESRS Sub-Topic	S3. COMMUNITIES' CIVIL AND POLITICAL RIGHTS	
Initiative Action Decision Fact	ThPA S.A. actually supports freedom of expression and encourages open communications with the local community. The port has established an inclusive Port Community body, ensuring representation from a wide range of stakeholders, to enable local organizations and residents to engage with the Company on legislative changes, operational updates, and investment projects that may impact the community, fostering dialogue and collaborative insights on various port-related matters.	
Risk/ Opportunity	By establishing an open dialogue with the local community and supporting the freedom of expression, the Company enhances trust and builds a positive reputation, contributing to stronger community relations and potential support for future projects. This could reduce social resistance to potential operational changes or regulatory approvals.	
	Opportunity	
Time Horizon	Long-term	
Value Chain	∞ / Downstream	

ESRS Sub-Topic	S4. PERSONAL SAFETY OF CONSUMERS AND/OR END-USERS	
Initiative Action Decision Fact	ThPA S.A. has established comprehensive policies and regulations to ensure the safety of all contractors, suppliers & port users within its port facilities, in full compliance with national regulations. These include signed agreements, documented procedures, and mandatory certifications. Strict safety protocols and risk assessments are consistently enforced, with internal inspectors overseeing safety measures. The Company maintains relevant certifications to ensure ongoing compliance and the highest safety standards across its operations.	
Risk/ Opportunity	Investing in safety compliance and health protocols, can reduce the Company's insurance costs and liability, while fostering a safe environment. This commitment also strengthens the port's brand reputation.	Any gap in implementing or enforcing health and safety protocols for consumers and end-users could lead to safety incidents or non-compliance penalties, which would affect operational continuity and cause significant legal costs.
	Opportunity	Risk
Time Horizon	Long-term	Long-term
Value Chain	∞ / Upstream/ Downstream	∞ / Upstream/ Downstream

ESRS Sub-Topic	S4. INFORMATION-RELATED IMPACTS FOR CONSUMERS AND/OR END-USERS	
Initiative Action Decision Fact	ThPA S.A. enforces strict access control over consumer data, limiting access to authorized users only and ensuring data privacy through a dedicated GDPR policy, with privacy statements for each department. There are external interface platforms, and the IT department rigorously enforces security protocols. While no data incidents have occurred, comprehensive measures are in place to mitigate risks should any arise.	
Risk/ Opportunity	By maintaining a secure and compliant data management system, the port can mitigate potential financial risks associated with data breaches or compliance violations, which can result in fines and legal expenses.	
	Opportunity	
Time Horizon	Long-term	
Value Chain	∞ / Downstream	

ESRS Sub-Topic	G1. CORPORATE CULTURE	
Initiative Action Decision Fact	ThPA S.A. has implemented several publicly available policies to ensure strong governance and sustainability in line with corporate culture. These include a recently updated sustainability policy, a conflict of interest policy with clear documentation procedures for executives, and policies on energy management, environmental protection, health and safety (ISO 45001 certified), and cybersecurity. The Company also adheres to an established Code of Ethics, which integrates sustainability aspects like responsible economic practices.	
Risk/ Opportunity	These policies improve decision-making, reduce risks, and ensure compliance with industry standards, which strengthens stakeholder trust and mitigates potential liabilities. As a result, the Company's long-term stability is improved, leading to greater financial performance, a competitive edge, and a positive reputation.	
	Opportunity	
Time Horizon	Long-term	
Value Chain	∞	

ESRS Sub-Topic	G1. CORRUPTION AND BRIBERY
Initiative Action Decision Fact	ThPA S.A. holds ISO 37001:2016 certification, recently renewed and has updated its anti-bribery and whistleblowing policies. These policies include a clear procedure for handling incidents and a reporting channel that protects whistleblower anonymity. To date, no corruption or bribery incidents have been reported.
Risk/ Opportunity	The strong anti-corruption framework can enhance investor confidence and stakeholder trust, potentially leading to increased business partnerships and long-term financial stability.
	Opportunity
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	G1. PROTECTION OF WHISTLE-BLOWERS
Initiative Action Decision Fact	ThPA S.A. has a Whistleblowing mechanism that ensures anonymity, with reports made via a special form on the website, phone, in writing or in person. Whistleblowers can choose not to provide personal details, and their identity is protected, even in face-to-face meetings. Retaliation is prohibited. The Compliance department handles investigations following a documented procedure in the complaint management manual. The system is open to employees and partners, promoting a culture of transparency and integrity.
Risk/ Opportunity	A solid Whistleblowing mechanism enhances the port's reputation for integrity and ethical practices and thus can attract socially responsible investors and partners, fostering stakeholder trust and collaboration.
	Opportunity
Time Horizon	Long-term
Value Chain	∞ / Downstream

ESRS Sub-Topic	G1. MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS INCLUDING PAYMENT PRACTICES
Initiative Action Decision Fact	ThPA S.A. has implemented a policy regarding late payments from/to suppliers, which is embedded within supplier contracts. The policy includes detailed clauses to ensure clear terms on payment timelines and responsibilities, providing a consistent framework for managing delayed payment scenarios across supplier relationships.
Risk/ Opportunity	The formalized payment terms help mitigate the risk of cash flow disruptions caused by delayed payments. With a structured framework in place, the Company minimizes potential supplier disputes, supporting accurate budget forecasting and improving cost management.
	Opportunity
Time Horizon	Long-term
Value Chain	Upstream



Disclosure of Changes to Material Impacts, Risks and Opportunities Compared to Previous Reporting Period

In 2024, ThPA S.A. carried out its first Double Materiality Analysis to align with CSRD requirements. As a result, the material topics from the previous reporting period were not assessed at the sub-topical and sub-sub-topical levels as outlined by CSRD. Therefore, a direct comparison with the current material topics is not feasible.

Disclosure of Specification of Impacts, Risks and Opportunities that are Covered by ESRS Disclosure Requirements as Opposed to Those Covered by Additional Entity-Specific Disclosures

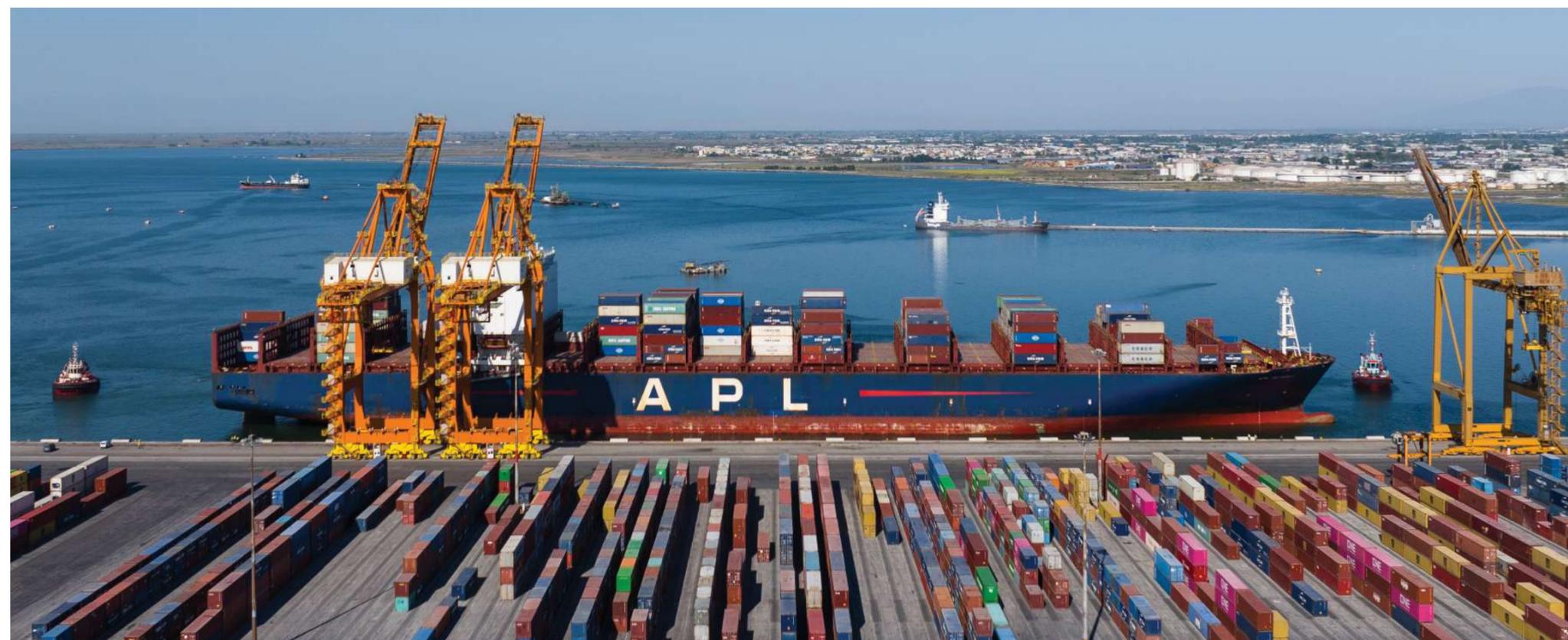
All identified material IROs are covered by ESRS disclosure requirements, and no entity-specific disclosure has been identified.

Disclosure of Whether and How Material Impacts Originate from, or are Connected to Strategy and Business Model

ThPA S.A.'s material impacts, inevitably affect, positively and/or negatively, people and the environment in many ways across its value chain, through its operations and activities (e.g. energy consumption) and the internal business environment (e.g. social related matters) in short-term, mid-term and long-term. As mentioned above, these impacts are interconnected and may interact with the strategy and business model through the Company's strategic focus to support sustainable development. For example, the adoption of energy-efficient practices, recycling activities and initiatives, support of wellbeing of employees etc., demonstrate a comprehensive approach to addressing sustainability-related challenges and create positive outcomes.

Information About Resilience of Strategy and Business Model Regarding Capacity to Address Material Impacts and Risks and to Take Advantage of Material Opportunities

ThPA S.A. has updated its strategy to integrate ESG factors into strategic planning, strengthening the Company's resilience. In addition to this, it has adapted its business model to address significant sustainability issues. Considering significant ESG factors that affect or could affect ThPA S.A.'s strategy, assures that the Company is prepared for a wide range of challenges and opportunities. Resilience is also reinforced by a comprehensive risk management system involving the entire spectrum of business activities. Therefore, ThPA S.A. is well-equipped to allocate expectations on challenges and minimize their impact. Such systems of business continuity have already been placed in front, quite well-documented elements within and enabled by operational resources, which go further to build back the resilience of the business model and strategy. These ensure that essential services remain available to minimize any disruption and allow the Company to maintain an efficient flow of operations, thereby meeting stakeholder expectations.



Disclosure of Current and Anticipated Effects of Material Impacts, Risks and Opportunities on Business Model, Value Chain, Strategy and Decision-Making, and How Undertaking has Responded or Plans to Respond to These Effects

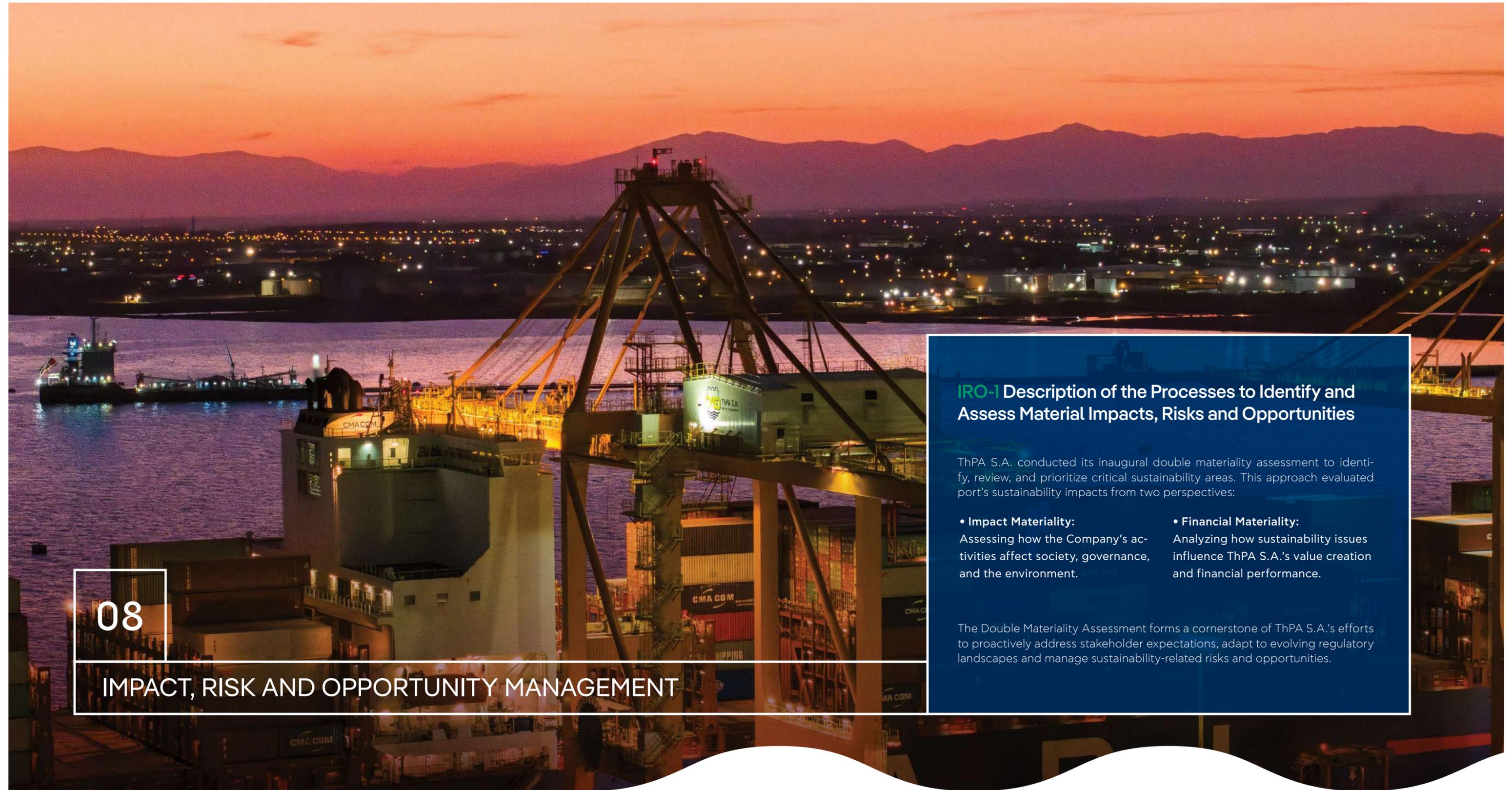
Through the DMA process, ThPA S.A. is enabled to clear understanding on the identified material impacts, risks and opportunities affecting both its operations and its value chain. This approach enhances resilience and reinforces sustainability as an integral element of ThPA S.A.'s strategic decision-making. This positions the Company to efficiently allocate resources and track the progress of its commitments by identifying key areas where its business model, strategy, value chain and decision-making processes are affected by the sustainability-related factors. Therefore, these actions and initiatives are both impactful and aligned with stakeholders' expectations.

Disclosure of Current Financial Effects of Material Risks and Opportunities on Financial Position, Financial Performance and Cash Flows and Material Risks and Opportunities for Which There is Significant Risk of Material Adjustment Within Next Annual Reporting Period to Carrying Amounts of Assets and Liabilities Reported in Related Financial Statements

As of the current reporting period, ThPA S.A. has found no financial effects from its material risks and opportunities on its financial position, performance, or cash flows.

Disclosure of Anticipated Financial Effects of Material Risks and Opportunities on Financial Position, Financial Performance and Cash Flows Over Short-, Medium- and Long-term

Due to the phased-in provision outlined in Appendix C of the ESRS, ThPA S.A. is leveraging the allowed transition period to enhance its methodologies for assessing and quantifying the anticipated financial effects of material risks and opportunities on its financial position, financial performance and cash flows across short-, medium- and long-term horizons. As the Company refines its approach and integrates more robust data analysis, it remains committed to progressively aligning its reporting with regulatory requirements, while ensuring the accuracy and reliability of its disclosures.



08

IMPACT, RISK AND OPPORTUNITY MANAGEMENT

IRO-1 Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities

ThPA S.A. conducted its inaugural double materiality assessment to identify, review, and prioritize critical sustainability areas. This approach evaluated port's sustainability impacts from two perspectives:

- **Impact Materiality:** Assessing how the Company's activities affect society, governance, and the environment.
- **Financial Materiality:** Analyzing how sustainability issues influence ThPA S.A.'s value creation and financial performance.

The Double Materiality Assessment forms a cornerstone of ThPA S.A.'s efforts to proactively address stakeholder expectations, adapt to evolving regulatory landscapes and manage sustainability-related risks and opportunities.

Step 1: Preliminary Understanding of Sustainability Issues

The first phase of ThPA S.A.'s Double Materiality Assessment focused on a benchmarking analysis to build an understanding of the Company's material topics, both specific to its operations and the broader industry. This process involved a comparative analysis, where ThPA S.A. examined its operations alongside those of its industry peers, thus evaluating key sustainability themes relevant to the Company and the sector. In order to identify the positive, negative, actual and potential impacts arising from its activities, ThPA S.A. held meetings with its internal stakeholders and key representatives of sustainability issues, by conducting working groups to gather the required information on its operations and initiatives. The outcome of these working groups was a long list of impacts, risks, and opportunities, which form the guiding principle for determining Impact Materiality and Financial Materiality. Before initiating the IROs identification phase of the DMA process, ThPA S.A. carefully reviewed and considered other reporting frameworks, including GRI and MSCI. However, the Company solely used ESRS for this assessment.

Step 2: Mapping of Stakeholders and the Value Chain

A key element of the analysis also involved mapping stakeholders and the value chain. Through this process, ThPA S.A. identified the complete list of stakeholders while examining the channels and frequency of communication with them. By situating the Company within the value chain map and analyzing its operational phases, along with the upstream and downstream segments, ThPA S.A. achieved a comprehensive understanding of its role within the broader spectrum of its operations.

Step 3: Scoring of the Impacts

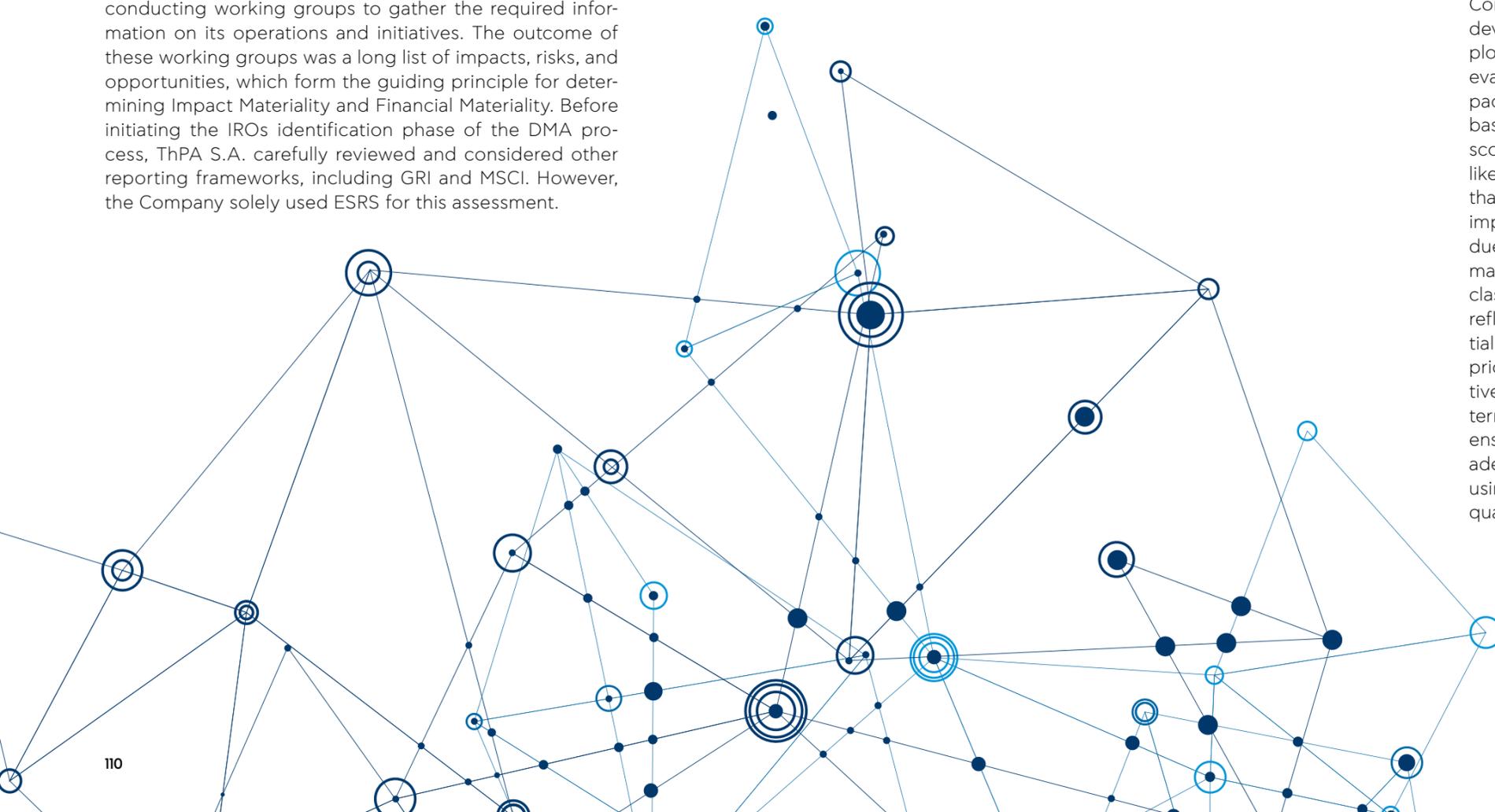
Impact Materiality

The Company's representatives proceeded to evaluate impacts, risks, and opportunities based on the scoring criteria established by the ESRS standards, distinguishing between Impact Materiality and Financial Materiality. Utilizing the outcomes of the Double Materiality Assessment, the Company identified and analyzed the risks and opportunities tied to its impacts. This process resulted in a prioritized list of sustainability themes, focusing on those with the greatest significance in terms of material impacts, risks, and opportunities. Each impact was assessed across two dimensions—Impact Materiality and Financial Materiality—allowing the Company to align its evaluation of effects on sustainable development with their financial relevance. ThPA S.A. employs an impact materiality assessment process to identify, evaluate, prioritize, and monitor its potential and actual impacts on people and the environment. Impacts are scored based on their severity—defined as a combination of scale, scope, and irreversibility (for negative impacts)—and their likelihood (for potential impacts). At this point it is noted that the Company acknowledges that certain "potential" impacts have been assigned the highest likelihood score due to strong evidence indicating their high probability to materialize. However, to fully comply with ESRS, impacts classified as "actually and potentially" were treated as actual, reflecting their ongoing and future influence, while "potentially" impacts were assessed separately as future risks. The prioritization of impacts applies to both positive and negative and considers their relative severity and likelihood. Internal stakeholder engagement informs these assessments, ensuring external stakeholder concerns are also reflected adequately. Material sustainability matters are determined using scoring thresholds, which establish whether a topic qualifies as material.

Financial Materiality

In the context of financial materiality, ThPA S.A. assesses the likelihood, magnitude, and nature of the financial effects of identified risks and opportunities through a structured financial materiality scoring process. This assessment evaluates how sustainability-related risks, and opportunities affect the port's financial performance. The scoring process considers the likelihood of financial outcomes and applies three time horizons—short, medium, and long term—to determine when financial benefits or losses may materialize. The magnitude of financial effects is assessed based on four key parameters: regulatory/legal, operational, reputational, and business/strategic effect. After scoring, thresholds are applied to determine which risks and opportunities are considered material. The Company has incorporated its Enterprise Risk Management (ERM) framework into the assessment process. While other types of risks, such as geopolitical risks were considered, they were not deemed significant enough to be included. Through the Double Materiality Assessment, ThPA S.A. identifies risks and opportunities based on its impacts, rather than dependencies on natural or human capital. This approach ensures a direct link between the Company's impact and financial materiality. During the workshops held as part of the assessment process, the gross risk perspective was indeed considered; however, it was decided to evaluate the financial effects based on the net risk perspective instead. This decision was made to ensure that the assessment reflects the risks as they stand after considering existing mitigation measures and controls.

ThPA S.A. assessed whether actions to address negative impacts or leverage opportunities in one sustainability matter led to material negative impacts or risks in another and did not identify any such cases.



Step 4: Validation of Impacts, Risks and Opportunities

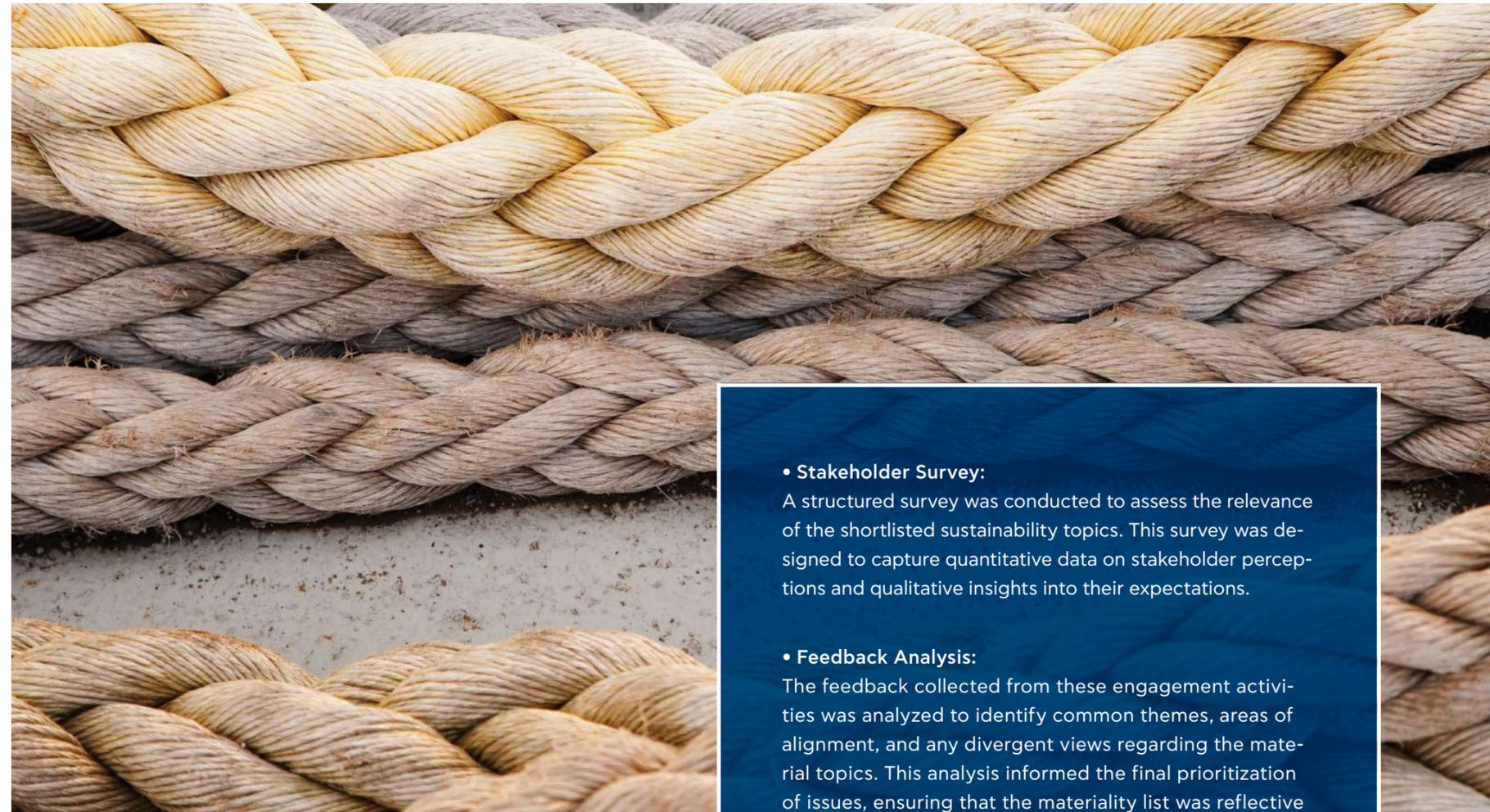
The final phase focused on the validation of the shortlisted material topics and the stakeholder engagement with both internal management and external stakeholders. To ensure the robustness and strategic alignment of the identified impacts, risks, and opportunities, a critical validation step was incorporated into the process, involving a thorough review by Management and members of the Sustainability Committee. This step served to verify that the assessments and scoring mechanisms were consistent with the organization's broader strategic objectives.

The decision-making process for addressing identified risks and opportunities involves multiple levels of review and approval. Initially, risks and opportunities were identified and assessed. It followed a structured, multi-step approach that began with the identification and assessment of these risks and opportunities. To ensure accountability, specific internal control procedures are in place, including regular monitoring and validation mechanisms. Different key Divisions including Risk Management, Financial, Sustainable Development validated the descriptions and scoring of the impacts, risks and opportunities. This step ensured accuracy and clarity. Finally, the results of financial materiality were reviewed by the Sustainability Committee, ensuring all significant financial implications were addressed. The Sustainability Committee also approved the results, thereby verifying top-level accountability. By engaging executive leadership, the organization was able to ensure that the findings were not only accurate but also aligned with the long-term goals, allowing for a more informed decision-making process that supports strategic priorities.

The process of identifying, assessing, and managing impacts and risks followed the DMA methodology. The IROs identification and assessment process is aligned with ThPA S.A.'s enterprise risk management (ERM) framework, ensuring that sustainability-related risks and opportunities are considered alongside financial and operational risks. However, the DMA methodology has not yet been fully integrated into ThPA S.A.'s overall risk management framework or used to assess its overall risk profile. The Company is actively working on incorporating climate and environmental factors into its business and risk management processes. The identification of opportunities has been derived through the DMA process, incorporating insights from stakeholder engagements, business operations and activities, and the active participation of internal experts. As it is the first time the DMA is being conducted to identify, assess and manage IROs, no comparison with previous years is applicable.

Step 5: Stakeholder Engagement

A stakeholder survey was also conducted to assess and prioritize sustainability material topics, ensuring that the identified sustainability topics not only reflected the Company's priorities but also resonated with external expectations. The assessment also included direct feedback from external stakeholders, which is crucial in ensuring that their concerns and priorities are adequately reflected in the final materiality list. Engaging with stakeholders—such as customers, suppliers, local communities, investors, and NGOs—enabled the port to gather diverse perspectives on the significance of the identified sustainability issues.



- **Stakeholder Survey:**

A structured survey was conducted to assess the relevance of the shortlisted sustainability topics. This survey was designed to capture quantitative data on stakeholder perceptions and qualitative insights into their expectations.

- **Feedback Analysis:**

The feedback collected from these engagement activities was analyzed to identify common themes, areas of alignment, and any divergent views regarding the material topics. This analysis informed the final prioritization of issues, ensuring that the materiality list was reflective of stakeholder concerns and priorities.

The following heatmap presents the aggregated results of the Stakeholder Survey, capturing the perceived importance of sustainability topics across different stakeholder groups. This visual representation allows for a clear identification of priority areas based on the level of interest and impact, as expressed during the engagement process.

The active involvement of stakeholders in the validation process ensured that the assessment was not only thorough but also aligned with external expectations. By incorporating stakeholder feedback, ThPA S.A. enhanced the transparency of the assessment, demonstrating its commitment to stakeholder inclusion and responsible business practices. This engagement process allowed stakeholders to feel heard and valued, reinforcing the notion that sustainability is a collaborative effort between ThPA S.A. and its community. Furthermore, it helped build trust and fostered a sense of shared responsibility in addressing sustainability challenges.

	Climate Change Mitigation	Energy	Marine Resources	Resource Outflows Related to Products & Services	Equal Treatment & Opportunities for All	Working Conditions	Communities' Civil & Political Rights	Information-Related Impacts for Consumers and/or End-Users	Personal Safety of Consumers and/or End-Users	Corporate Culture	Corruption & Bribery	Management of Relationships with Suppliers Including Payment Practices	Political Engagement	Protection of Whistle-Blowers
Investors & Shareholders	High	High	Medium	Low	Low	High	Low	Low	Low	Low	High	Medium	Medium	High
Media	High	High	High	Low	Low	High	Low	High	High	Low	High	Low	Medium	High
Suppliers	Medium	Low	High	High	High	High	Low	Low	High	High	High	High	Low	High
Ports & Terminals	High	High	High	High	Low	High	High	High	High	Low	Low	High	High	Low
Financial Institutions & Creditors	Low	Low	High	High	High	High	High	High	High	High	High	Low	Low	High
Research Institutions & Academia	High	High	High	High	High	High	High	Low	High	High	High	Low	Low	High
Passengers	High	Low	High	Low	Low	Low	Low	High	High	High	High	Low	High	High
Regulatory Bodies, Ministries & Port Authorities	Low	Low	High	High	Low	High	High	Low	High	High	High	High	High	High
Employees	Low	High	High	High	High	High	Low	Low	High	High	High	High	Low	High
Customers, Shipping & Terminal Operator	High	High	High	High	High	High	Low	High	High	Low	High	Low	Low	High

■ HIGH IMPORTANCE ■ MEDIUM IMPORTANCE ■ LOW IMPORTANCE



Description of the Processes to Identify and Assess Material Climate-Related Impacts, Risks and Opportunities [E1-IRO-1]

ThPA S.A.'s impact on climate change is linked to its greenhouse gas (GHG) emissions, primarily from fuel consumption for transport, equipment and electricity usage. The Company has implemented measures according to ISO 50001 and ISO 14064 to monitor and reduce emissions, including switching to renewable energy, using energy-efficient technologies and installing real-time monitoring systems. Though significant progress has been made in reducing GHG emissions, ThPA S.A. recognizes the importance of a coordinated transition/ decarbonization plan to align with national and global climate goals. Further assessments, particularly regarding supply chain emissions, may be considered for future climate impact management.

Climate-related physical and transition risks and opportunities have not yet been assessed through scenario analysis. As a result, the company has not identified specific climate-related hazards or transition events based on high-emission or 1.5°C-aligned climate scenarios. Future assessments may be conducted to evaluate exposure and sensitivity to such risks and opportunities. During the next reporting cycle, the company will discuss the specific timeframe for these assessments.

Description of the Processes to Identify and Assess Material Water and Marine Resources -Related Impacts, Risks and Opportunities [E-IRO-1]

Through a systematic procedure that involves environmental monitoring and risk assessments, ThPA S.A. identifies and evaluates material impacts, risks and opportunities related to water and marine resources. To detect any threats to marine ecosystems and water quality, the Company conducts routine assessments of its operations and the surrounding environment. Seawater quality is monitored every six months as part of the environmental monitoring process. To manage risks associated with water and marine resources, ThPA S.A. also utilizes well-established frameworks, such as emergency response plans and environmental impact assessments. Through its ongoing cooperation with the Harbor Master, particularly in the development and implementation of water protection strategies, opportunities for improvement are explored.

ThPA S.A. has consulted with key stakeholders, as part of its commitment to promote sustainable practices, concerning water and marine resources. An external stakeholder questionnaire was developed by the Company to gather the views of affected stakeholders on material sustainability topics, such as water and marine resources. The questionnaire examined, among other things, the possible correlation between the Company's operations and services and marine resources and therefore to what extent they affect them. Those consultations were designed to ensure that concerns and insights from stakeholders, including communities directly impacted, were considered in the assessment of impacts, risks and opportunities regarding water and marine resources practices by ThPA S.A.

Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities [E5 IRO-1]

ThPA S.A. conducted a Double Materiality Assessment (DMA) to screen its assets and activities with the intention of determining and evaluating actual and potential impacts, risks and opportunities related to resource use and circular economy, across the Company's value chain. Through the DMA process, the Company considered various assumptions, including regulatory compliance and goals for long-term environmental sustainability. The results of the DMA guide the Company's decisions regarding its sustainability-related issues. ThPA S.A. implements a comprehensive waste management approach to systematically assess and manage waste-related impacts across its operations and value chain. Through its Port Waste Management Plan, the Company evaluates waste generation, recycling, reuse and disposal processes. Key factors such as waste type, volume, disposal methods, resource recovery potential and compliance with local, national and EU regulations are considered (e.g. Directive 2008/98/EC - Waste Framework Directive - of the European Parliament and of the Council which is also embedded in national regulations). The implementation of waste registration and monitoring systems identifies areas where significant quantities of waste are generated and provides opportunities for reduction or recycling. ThPA S.A. manages all ship waste that is delivered to its facilities according to a Ship-waste and cargo residues management plan in collaboration with two licensed contractors that were selected based on open tenders according to the provisions of EU Regulation 352/2017.

ThPA S.A. has consulted with key stakeholders, as part of its commitment to promote sustainable practices, concerning circular economy. By means of an external stakeholder questionnaire, the Company surveyed affected communities for their views on material sustainability topics, such as circular economy. The questionnaire focused on the Company's operations and services and the ways they relate to and affect circular economy and more specifically waste reduction and management. Those consultations were designed to ensure that concerns and insights from stakeholders, including communities directly impacted, were considered in the assessment of impacts, risks and opportunities regarding circular economy practices by ThPA S.A.

Description of the Processes to Identify and Assess Material Impacts, Risks and Opportunities [GI-IRO-1]

ThPA S.A. identifies material impacts, risks, and opportunities (IROs) related to business conduct by following a structured process that incorporates location, activity, sector and transaction structure. The Company targets regional growth through partnerships with local businesses and SMEs mainly in Thessaloniki and Central Macedonia. The Company also screens its activities for governance-related issues such as corporate culture, prevention of corruption, management of supplier relationships, participation in political initiatives and protection of whistleblowers. As part of the port and logistics sector, ThPA S.A. aligns its practices with industry-specific risks and opportunities, embedding governance principles into transaction frameworks such as supplier contracts to promote ethical practices, ensure compliance with ESG standards and mitigate financial and operational risks. This thorough approach ensures that ThPA S.A. effectively addresses material impacts and risks, while leveraging opportunities to align its business conduct with ethical practices, strategic goals and sustainable development.

IRO-2 Disclosure Requirements in ESRS Covered by the Undertaking's Sustainability Statement

The tables below outline all ESRS disclosure requirements from ESRS 2 and the eight relevant topical standards that are material to ThPA S.A. and have shaped the preparation of our sustainability statements. Disclosure requirements for topical standards E2, E4 and S2 are excluded, as these fall below our materiality thresholds.

The tables serve as a guide to locate information on specific disclosure requirements within the sustainability statement.

In cases where we do not yet have any information related to a disclosure requirement, no reference is made.

Cross-Cutting Standards Disclosure Requirements		Section / Report
ESRS 2 General Requirements		
BP-1	General basis for preparation of the sustainability statement	BP-1 - General basis for preparation of the sustainability statement
BP-2	Disclosures in relation to specific circumstances	BP-2 - Disclosures in relation to specific circumstances
	Datapoints that derive from other EU legislation	BP-2 - Disclosures in relation to specific circumstances
GOV-1	The role of the administrative, management and supervisory bodies	GOV-1 - The role of the administrative, management and supervisory bodies
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	GOV-2 - Sustainability governance
GOV-3	Integration of sustainability-related performance in incentive schemes	GOV-3 - Integration of sustainability-related performance in incentive schemes
GOV-4	Statement on sustainability due diligence	GOV-4 - Statement on sustainability due diligence
GOV-5	Risk management and internal controls over sustainability reporting	GOV-5 - Risk management and internal controls over sustainability reporting
SBM-1	Strategy, business model and value chain (products, markets, customers)	SBM-1 - Strategy, business model and value chain
	Strategy, business model and value chain (headcount by country)	SBM-1 - Strategy, business model and value chain
	Strategy, business model and value chain (breakdown of revenue)	SBM-1 - Strategy, business model and value chain
SBM-2	Interests and views of stakeholders	SBM-2 - Interests and views of stakeholders
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model
IRO-1	Description of the process to identify and assess material impacts, risks, and opportunities	IRO-1 - Description of the process to identify and assess material impacts, risks, and opportunities
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement

Environmental Standards Disclosure Requirements		Section / Report
ESRS E1 Climate Change		
ESRS 2, GOV-3	Integration of sustainability-related performance in incentive schemes	GOV-3 - Integration of sustainability-related performance in incentive schemes
E1-1	Transition plan for climate change mitigation	E1-1 - Transition plan for climate change mitigation
ESRS 2, SBM-3	Material impacts, risks and opportunities, and their interaction with strategy and business model	SBM-3 - Material impacts, risks and opportunities, and their interaction with strategy and business model
ESRS 2, IRO-1	Description of the processes to identify and assess material climate related impacts, risks, and opportunities	IRO-1 - Description of the process to identify and assess material impacts, risks, and opportunities
E1-2	Policies related to climate change mitigation and adaptation	E1-2 - Policies related to climate change mitigation and adaptation
E1-3	Actions and resources in relation to climate change policies	E1-3 - Actions and resources in relation to climate change policies
E1-4	Targets related to climate change mitigation and adaptation	E1-4 - Targets related to climate change mitigation and adaptation
E1-5	Energy consumption and mix	E1-5 - Energy consumption and mix
E1-6	Gross Scopes 1, 2, 3 and total GHG emissions	E1-6 - Gross Scopes 1, 2, 3 and total GHG emissions
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	E1-7 - GHG removals and GHG mitigation projects financed through carbon credits
E1-8	Internal carbon pricing	E1-8 - Internal carbon pricing
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Phased - in

Environmental Standards Disclosure Requirements		Section / Report
ESRS E3 Water and Marine Resources		
ESRS 2, IRO-1	Description of the processes to identify and assess material pollution-related impacts, risks, and opportunities	IRO-1 - Description of the process to identify and assess material impacts, risks, and opportunities
E3-1	Policies related to water and marine resources	E3-1 - Policies related to water and marine resources
E3-2	Actions and resources related to marine resources	E3-2 - Actions and resources related to marine resources
E3-3	Targets related to water and marine resources	E3-3 - Targets related to water and marine resources
E3-4	Water consumption	E3-4 - Water consumption
E3-5	Anticipated financial effects from pollution-related impacts, risks, and opportunities	Phased - in

Environmental Standards Disclosure Requirements		Section / Report
ESRS E5 Resource Use and Circular Economy		
ESRS 2, IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks, and opportunities	IRO-1 - Description of the process to identify and assess material impacts, risks, and opportunities
E5-1	Policies related to resource use and circular economy	E5-1 - Policies related to resource use and circular economy
E5-2	Actions and resources related to resource use and circular economy	E5-2 - Actions and resources related to resource use and circular economy
E5-3	Targets related to resource use and circular economy	E5-3 - Targets related to resource use and circular economy
E5-4	Resource inflows	E5-4 - Resource inflows
E5-5	Resource outflows	E5-5 - Resource outflows
E5-6	Anticipated financial effects from biodiversity and ecosystems-related risks and opportunities	Phased - in

Social Standards Disclosure Requirements		Section / Report
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ESRS S1 Own Workforce

ESRS 2, SBM-2	Interests and views of stakeholders	SBM-2 – Interests and views of stakeholders
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
S1-1	Policies related to own workforce	S1-1 – Policies related to own workforce
S1-2	Processes for engaging with own workers and workers’ representatives about impacts	S1-2 – Processes for engaging with own workers and workers’ representatives about impacts
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	S1-4 Actions
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
S1-6	Characteristics of the undertaking’s employees	S1-6 Characteristics of the undertaking’s employees
S1-7	Characteristics of non-employee workers in the undertaking’s own workforce	S1-7 Characteristics of non-employee workers in the undertaking’s own workforce
S1-8	Collective bargaining coverage and social dialogue	S1-8 Collective bargaining coverage and social dialogue
S1-9	Diversity metrics	S1-9 Diversity metrics
S1-10	Adequate wages	S1-10 Adequate wages
S1-11	Social Protection	S1-11 Social Protection
S1-12	Persons with disabilities	S1-12 Persons with disabilities
S1-13	Training and skills development metrics	S1-13 Training and skills development metrics
S1-14	Health and safety metrics	S1-14 Health and safety metrics
S1-15	Work-life balance metrics	S1-15 Work-life balance metrics
S1-16	Remuneration metrics (pay gap and total remuneration)	S1-16 Remuneration metrics (pay gap and total remuneration)
S1-17	Incidents, complaints and severe human rights impacts	S1-17 Incidents, complaints and severe human rights impacts

Social Standards Disclosure Requirements		Section / Report
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ESRS S3 Affected Communities

ESRS 2, SBM-2	Interests and views of stakeholders	SBM-2 Interests and views of stakeholders
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
S3-1	S3-1 Policies related to affected communities	S3-1 Policies related to affected communities
S3-2	Processes for engaging with affected communities about impacts	S3-2 Processes for engaging with affected communities about impacts
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S3-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Social Standards Disclosure Requirements		Section / Report
ESRS S4 Consumers and End-Users		
ESRS 2, SBM-2	Interests and views of stakeholders	SBM-2 Interests and views of stakeholders
ESRS 2, SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
S4-1	Policies related to consumers and end-users	S4-1 Policies related to consumers and end-users
S4-2	Processes for engaging with consumers and end-users about impacts	S4-2 Processes for engaging with consumers and end-users about impacts
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Government Standards Disclosure Requirements		Section / Report
ESRS G1 Business Conduct		
ESRS 2, GOV-1	The role of the administrative, supervisory and management bodies	GOV-1 The role of the administrative, supervisory and management bodies
ESRS 2, IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities
G1-1	Business conduct policies and corporate culture	G1-1 Business conduct policies and corporate culture
G1-2	Management of relationships with suppliers	G1-2 Management of relationships with suppliers
G1-3	Prevention and detection of corruption and bribery	G1-3 Prevention and detection of corruption and bribery
G1-4	Incidents of corruption or bribery	G1-4 Incidents of corruption or bribery
G1-5	Political influence and lobbying activities	G1-5 Political influence and lobbying activities
G1-6	Payment practices	G1-6 Payment practices

Datapoints that Derive from Other EU Legislation

The table below includes all the datapoints that derive from other EU legislation as listed in ESRS 2 appendix B, indicating where the data points can be found in ThPA S.A.'s report and which data points are assessed as "Not material" (NM), "Not available" (NAv) and "Not Applicable" (NA).

Disclosure Requirement	ESRS 2 GOV-1	ESRS 2 GOV-1	ESRS 2 GOV-4	ESRS 2 SBM-1	ESRS 2 SBM-1	ESRS 2 SBM-1	ESRS 2 SBM-1	ESRS E1-1	ESRS E1-1
Data Point	21 (d)	21 (e)	30	40 (d) i	40 (d) ii	40 (d) iii	40 (d) iv	14	16 (g)
Sustainability Statements Appendix	Board's gender diversity	Percentage of board members who are independent	Statement on due diligence	Involvement in activities related to fossil fuel activities	Involvement in activities related to chemical production	Involvement in activities related to controversial weapons	Involvement in activities related to cultivation and production of tobacco	Transition plan to reach climate neutrality by 2050	Undertakings excluded from Paris-aligned Benchmarks
SFDR reference	✓		✓	✓	✓	✓			
Pillar 3 reference				✓					✓
Benchmark Regulation Reference	✓	✓		✓	✓	✓	✓		✓
EU Climate Law Reference								✓	
Section in the Statement/ NM/NAv/NA	GOV-1 The role of the administrative, supervisory and management bodies	GOV-1 The role of the administrative, supervisory and management bodies	GOV-4 - Statement on sustainability due diligence	SBM-1 - Strategy, business model and value chain	SBM-1 - Strategy, business model and value chain	SBM-1 - Strategy, business model and value chain	SBM-1 - Strategy, business model and value chain	NAv	NAv

Disclosure Requirement	ESRS E1-4	ESRS E1-5	ESRS E1-5	ESRS E1-5	ESRS E1-6	ESRS E1-6	ESRS E1-7	ESRS E1-9	ESRS E1-9
Data Point	34	38	37	40-43	44	53-55	56	66	66 (a); 66 (c)
Sustainability Statements Appendix	GHG emission reduction targets	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Energy consumption and mix	Energy intensity associated with activities in high climate impact sectors	Gross Scope 1, 2, 3 and Total GHG emissions	Gross GHG emissions intensity	GHG removals and carbon credits	Exposure of the benchmark portfolio to climate-related physical risks	Disaggregation of monetary amounts by acute and chronic physical risk; Location of significant assets at material physical risk
SFDR reference	✓	✓	✓	✓	✓	✓			
Pillar 3 reference	✓				✓	✓			✓
Benchmark Regulation Reference	✓				✓	✓		✓	✓
EU Climate Law Reference							✓		
Section in the Statement/ NM/NAv/NA	NAv	E1-5 Energy consumption and mix	E1-5 Energy consumption and mix	E1-5 Energy consumption and mix	E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	E1-6 Gross Scope 1, 2, 3 and Total GHG emissions	NAv	Nav (phase-in)	NAv (phase-in)

Disclosure Requirement	ESRS E1-9	ESRS E1-9	ESRS E2-4	ESRS E3-1	ESRS E3-1	ESRS E3-1	ESRS E3-4	ESRS E3-4	ESRS 2- SBM 3 - E4
Data Point	67 (c)	69	28	9	13	14	28 (c)	29	16 (a) i
Sustainability Statements Appendix	Breakdown of the carrying value of its real estate assets by energy-efficiency classes	Degree of exposure of the portfolio to climate-related opportunities	Amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water, and soil	Water and marine resources	Dedicated policy	Sustainable oceans and seas	Total water recycled and reused.	Total water consumption in m3 per net revenue on own operations	
SFDR reference			✓	✓	✓	✓	✓	✓	✓
Pillar 3 reference	✓								
Benchmark Regulation Reference		✓							
EU Climate Law Reference									
Section in the Statement/ NM/NAv/NA	NAv (phase-in)	NAv (phase-in)	NM	E3-1 Policies related to water and marine resources	E3-1 Policies related to water and marine resources	NAv	NAv	E3-4 Water Consumption	NM

Disclosure Requirement	ESRS 2- SBM 3 - E4	ESRS 2- SBM 3 - E4	ESRS E4-2	ESRS E4-2	ESRS E4-2	ESRS E5-5	ESRS E5-5	ESRS 2- SBM3 - S1	ESRS 2- SBM3 - S1
Data Point	16 (b)	16 (c)	24 (b)	24 (c)	24 (d)	37 (d)	39	14 (f)	14 (g)
Sustainability Statements Appendix			Sustainable land / agriculture practices or policies	Sustainable oceans / seas practices or policies	Policies to address deforestation	Non-recycled waste	Hazardous waste and radio-active waste	Risk of incidents of forced labor	Risk of incidents of child labor
SFDR reference	✓	✓	✓	✓	✓	✓	✓	✓	✓
Pillar 3 reference									
Benchmark Regulation Reference									
EU Climate Law Reference									
Section in the Statement/ NM/NAv/NA	NM	NM	NM	NM	NM	E5-5 Resource outflows	E5-5 Resource outflows	SBM-3 – S1 Material impacts, risks and opportunities and their interaction with strategy and business model	SBM-3 – S1 Material impacts, risks and opportunities and their interaction with strategy and business model

Disclosure Requirement	ESRS S1-1	ESRS S1-1	ESRS S1-1	ESRS S1-1	ESRS S1-3	ESRS S1-14	ESRS S1-14	ESRS S1-16	ESRS S1-16
Data Point	20	21	22	23	32 (c)	88 (b) and (c)	88 (e)	97 (a)	97 (b)
Sustainability Statements Appendix	Human rights policy commitments	Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8	Processes and measures for preventing trafficking in human beings	Workplace accident prevention policy or management system	Grievance/complaints handling mechanisms	Number of fatalities and number and rate of work-related accidents	Number of days lost to injuries, accidents, fatalities, or illness	Unadjusted gender pay gap	Excessive CEO pay ratio
SFDR reference	✓		✓	✓	✓	✓	✓	✓	✓
Pillar 3 reference									
Benchmark Regulation Reference		✓				✓		✓	
EU Climate Law Reference									
Section in the Statement/ NM/NAv/NA	S1-1 Policies related to own workforce	S1-1 Policies related to own workforce	S1-1 Policies related to own workforce	S1-1 Policies related to own workforce	S1-3 Processes to remediate impacts and channels for own workers to raise concerns	S1-14 Health and safety metrics	S1-14 Health and safety metrics	S1-16 Remuneration metrics (pay gap and total remuneration)	S1-16 Remuneration metrics (pay gap and total remuneration)

Disclosure Requirement	ESRS S1-17	ESRS S1-17	ESRS 2- SBM3 – S2	ESRS S2-1	ESRS S2-1	ESRS S2-1	ESRS S2-1	ESRS S2-4	ESRS S3-1
Data Point	103 (a)	104 (a)	11 (b)	17	18	19	19	36	16
Sustainability Statements Appendix	Incidents of discrimination	Non-respect of UNGPs on Business and Human Rights and OECD	Significant risk of child labour or forced labour in the value chain/tices or policies	Human rights policy commitments	Policies related to value chain workers	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8	Human rights issues and incidents connected to its upstream and downstream value chain	Human rights policy commitments
SFDR reference	✓	✓	✓	✓	✓	✓		✓	✓
Pillar 3 reference									
Benchmark Regulation Reference		✓				✓	✓		
EU Climate Law Reference									
Section in the Statement/ NM/NAv/NA	S1-17 Incidents, complaints and severe human rights impacts	S1-17 Incidents, complaints and severe human rights impacts	NM	NM	NM	NM	NM	SBM-3 – S1 Material impacts, risks and opportunities and their interaction with strategy and business model	S3-1 Policies related to affected communities

Disclosure Requirement	ESRS S3-1	ESRS S3-4	ESRS S4-1	ESRS S4-1	ESRS S4-4	ESRS G1-1	ESRS G1-1	ESRS G1-4	ESRS G1-4
Data Point	17	36	16	17	35	§10 (b)	§10 (d)	§24 (a)	§24 (b)
Sustainability Statements Appendix	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	Human rights issues and incidents	Policies related to consumers and end-users	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	Human rights issues and incidents	United Nations Convention against Corruption	Protection of whistle-blowers	Fines for violation of anti-corruption and anti-bribery laws	Standards of anti-corruption and anti-bribery
SFDR reference	✓	✓	✓	✓	✓	✓	✓	✓	✓
Pillar 3 reference									
Benchmark Regulation Reference	✓			✓				✓	
EU Climate Law Reference									
Section in the Statement/ NM/NAv/NA	S3-1 Policies related to affected communities	S3-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	S4-1 Policies related to consumers and end-users	S4-1 Policies related to consumers and end-users	S4-4 Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	G1-1 Business conduct policies and corporate culture	G1-1 Business conduct policies and corporate culture	G1-4 Incidents of corruption or bribery	G1-4 Incidents of corruption or bribery

MDR-P Policies Adopted to Manage Material Sustainability Matters

ThPA S.A. has established a range of policies, which are in place to prevent, mitigate and remediate actual and potential sustainability-related identified impacts, risks and opportunities. The responsible persons for their implementation, continuously monitor effectiveness with actions reported alongside relevant disclosures. The Table below discloses ThPA S.A.'s policies related to specific sustainability matters.

Policy	ENVIRONMENTAL POLICY
Description	<p>The Policy is designed to promote sustainable development through the provision of quality and environmentally friendly services and is one of the main strategic goals of ThPA S.A. In this context, ThPA S.A. has designed and implements an Environmental Management System in accordance with the requirements of the International Standard ELOT EN ISO 14001: 2015 based on its needs and aspirations and in accordance with Legal and Regulatory requirements of applicable National and European legislation. ThPA S.A. has adopted several commitments related to environmental protection. To ensure these commitments, ThPA S.A. continuously improves the Environmental Management System by using the following processes:</p> <ul style="list-style-type: none"> • Management Reviews • Internal Audits • Identification and evaluation of the environmental aspects of its activities and their impact • Corrective actions
Scope	Company
Accountable for Implementation	Director of Sustainability & Environmental Strategy
Internationally Recognized Instruments	ISO 14001
Availability	Corporate Website

Policy	SUSTAINABILITY POLICY
Description	<p>ThPA S.A. has decided to develop a Sustainability Policy in order to better communicate its ongoing efforts towards sustainability. The Sustainability Policy also supports ThPA S.A.'s efforts to meet its role as a vital part of economic activity in Greece, the Balkans and Southeast Europe. The Company's ambition is to create economic value and social surplus, always in accordance with the principles of sustainable development and environmental protection. The Sustainability Strategy of the Company is based on four pillars:</p> <ul style="list-style-type: none"> • Creating Sustainable Value • Environment • Society • Governance <p>These pillars constitute the framework for all actions and initiatives related to ESG implementation throughout the Company. To support this effort, the Company is committed to adopting responsible practices, introducing due diligence mechanisms, making commitments and setting targets and KPIs.</p>
Scope	Company, Local communities
Accountable for Implementation	Director of Sustainability & Environmental Strategy
Internationally Recognized Instruments	N/A
Availability	Corporate Website

Policy	ENERGY MANAGEMENT POLICY
Description	<p>ThPA S.A., considers the ongoing energy and climate crisis, the requirements of the National and European legislation and thus is making continuous efforts to reduce its energy footprint and the greenhouse gas emissions of its activities through various commitments such as the continuous improvement of its energy performance.</p>
Scope	Company
Accountable for Implementation	Director of Sustainability & Environmental Strategy
Internationally Recognized Instruments	ISO 50001
Availability	Corporate Website

Policy	PROCUREMENT REGULATION
Description	<p>The Procurement Policy sets out the terms and conditions, rules and principles governing the procurement function and procedures of ThPA S.A. The main objectives of the Policy are:</p> <ul style="list-style-type: none"> • To ensure that works, goods and services procured meet the Company's business needs and requirements in terms of quality, safety and efficiency • To achieve optimal use of ThPA S.A.'s resources and optimize the added value for the Company, in terms of cost, quality and delivery time • To ensure transparency and effectiveness across all procurement procedures • To promote fair competition • To ensure probity and accountability for outcomes – probity means integrity and honesty, and the Company conducts its purchasing activities with the utmost probity • To provide guidance to the Company to allow consistency across all procurement activities • To prevent, adequately control and avert the risks the Company is exposed to
Scope	Company, Suppliers
Accountable for Implementation	Procurement & Investments Division Director
Internationally Recognized Instruments	All the principles of European and national procurement law
Availability	Corporate Website

Policy	CODE OF ETHICS
Description	<p>Includes the fundamental principles (integrity, technological Leadership and Innovation, team spirit, merit-based approach, gifts, invitations and other donations, compliance, non-discrimination, harassment, reporting violations), rules and values that shape the framework of corporate activities and determine ThPA S.A.'s daily conduct and practice. The sum of these rules and principles describes the type of behavior that the Company expects from its people, as well as the way in which they conduct their business activities with its customers, its suppliers and all its associates.</p> <p>The Code of Ethics and the related procedures and measures apply to all workers, employees, executives, and Senior Management. ThPA S.A. also encourages its contractors, suppliers, associates, consultants, users and other business partners to respect the principles of this Code.</p>
Scope	Company, Business Relationships, Partners, Community
Accountable for Implementation	Corporate Governance
Internationally Recognized Instruments	N/A
Availability	Corporate Website

Policy	DIVERSITY POLICY
Description	The Company's objective is to treat all employees honestly and fairly, and to promote their advancement and growth. The policy of THPA S.A. is to operate under fair and legal procedures of human resources management, and not to discriminate on the basis of age, race, gender, color, ethnic origin, religious beliefs, health status, sexual preferences, political or ideological views, or other employee characteristics that are protected by laws and regulations. Employees are required to comply with all laws and regulations and to perform their work in light of the above non-discrimination principle.
Scope	Company
Accountable for Implementation	HR Director
Internationally Recognized Instruments	N/A
Availability	Corporate Website

Policy	RECRUITMENT POLICY
Description	<p>Includes all activities related to the planning, recruitment, selection and hiring of new employees at ThPA S.A. The execution of the steps and activities that make up the overall recruitment process is aimed at attracting and recruiting staff through proper and merit-based criteria to meet the Company's requirements and to ensure the ability of new employees to meet the company's needs and help achieve its strategic objectives. At the same time, they aim to ensure transparency of procedures in order to strengthen the climate of trust in the company. The following steps constitute the recruitment process:</p> <ul style="list-style-type: none"> • Forecasting Human Resource Needs, • Vacancy Coverage Request, • Candidate Search, • Recruitment Application Management, • Candidate Evaluation and Selection, • Hiring
Scope	Company
Accountable for Implementation	HR Director
Internationally Recognized Instruments	N/A
Availability	Corporate Intranet & Sustainability Report

Policy	TRAINING AND DEVELOPMENT POLICY
Description	<p>This Training and Development Policy aims to outline the process for:</p> <ul style="list-style-type: none"> • Identification • Analysis • Planning • Implementation, and • Evaluation <p>of employee Training and Development programs. All employees of the Company have the right to participate in training and development programs that the company determines they should attend, in line with its personnel training policy.</p>
Scope	Company
Accountable for Implementation	HR Director
Internationally Recognized Instruments	N/A
Availability	Corporate Intranet & Sustainability Report

Policy	POLICY TO PREVENT AND COMBAT VIOLENCE AND HARASSMENT
Description	<p>This Policy contains the assessment of the risks of violence, harassment, discrimination and breach of equal opportunities at work, measures to prevent, control, limit and address such risks and to monitor such incidents or behaviors, the actions that will be in place to inform and raise awareness of the staff, the rights and obligations of the employees and the Company, as well as of the persons who exercise the managerial right or represent the company, to the extent of their own responsibility, in case of such incidents are reported or actually happen. The Policy also includes the procedure for managing internal complaints about the above incidents, the secure and easily accessible communication channels for receiving complaints.</p>
Scope	Company
Accountable for Implementation	HR Director
Internationally Recognized Instruments	All the principles of national law regarding direct and indirect discrimination on grounds of gender in harassment and sexual harassment
Availability	Corporate Intranet

Policy	OCCUPATIONAL HEALTH AND SAFETY POLICY
Description	<p>The defense of Health and Safety at work, as well as the creation and maintenance of a healthy and safe working environment, are the main priorities of ThPA S.A. It is a commitment of the Management to provide safe and healthy working conditions for the prevention of accidents at work and occupational diseases as well as the continuous improvement of the efficiency of the Management System for Health and Safety at work.</p>
Scope	Company, Suppliers & Contractors, Consumers and End-Users
Accountable for Implementation	Head of Quality, Health & Safety Department
Internationally Recognized Instruments	ISO 45001
Availability	Corporate Website

Policy	BUSINESS CONTINUITY POLICY
Description	<p>The purpose of this Policy is to provide a general framework through which an effective System is established and implemented, which:</p> <ul style="list-style-type: none"> • ensures that critical activities, support resources and interdependencies between them are identified • takes into account the results of the business continuity risk assessment and business impact analysis, in order to select the appropriate business continuity strategy • remains effective in achieving the objectives and meeting the requirements of business continuity, while fully in line with the requirements of the International Standard ELOT EN ISO 22301: 2019.
Scope	Company
Accountable for Implementation	CEO
Internationally Recognized Instruments	ISO 22301
Availability	Corporate Website

Policy	QUALITY POLICY
Description	<p>The Policy aims to meet the requirements of the modern business reality and ensure the ongoing improvement of its processes with a view to achieving top customer satisfaction. In this context, ThPA S.A., seeks to:</p> <ul style="list-style-type: none"> • Comply with the requirements of ISO 9001:2015 • Comply with the applicable relevant legislation, International Codes and best practices • Provide ongoing information and training to all its employees through training programmes • Constantly improve the Quality Insurance System and the company operations
Scope	Company
Accountable for Implementation	Head of Quality, Health & Safety Department
Internationally Recognized Instruments	ISO 9001
Availability	Corporate Website

Policy	POLICY ON THE PROTECTION OF CONFIDENTIAL INFORMATION
Description	Members of the Board of Directors are obligated to maintain the confidentiality of any non-public, proprietary, or sensitive company information. Such information may only be used in relation to their role as Directors and must not be disclosed or utilized for any personal or external purpose. Any breach of this obligation may result in disciplinary or legal consequences.
Scope	Company
Accountable for Implementation	Corporate Governance
Internationally Recognized Instruments	N/A
Availability	Corporate Website

Policy	CONFLICT OF INTEREST POLICY
Description	This Policy establishes the concept of conflict of interest, the persons liable to comply with the policy, as well as those special cases where it is possible for a conflict of interest to ensue. The purpose of this Policy is to institute substantial rules which delimit the conflicts of interest within the corporate organization, in order for the competent administrative, managerial and supervisory bodies to be able to: (a) identify, evaluate, anticipate, manage, deal with or avert similar states and, subsequently, to (b) safeguard and promote the corporate interest.
Scope	Company
Accountable for Implementation	Compliance and Risk Management Officer
Internationally Recognized Instruments	N/A
Availability	Corporate Website

Policy	SUITABILITY OF BOD MEMBERS POLICY
Description	The Suitability Policy for the members of the Board of Directors of the Company defines the basic principles and framework for the selection, renewal of the term of office and replacement of the members of the BoD, as well as the criteria set for that purpose.
Scope	Company
Accountable for Implementation	Nomination Committee
Internationally Recognized Instruments	N/A
Availability	Corporate Website

Policy	REMUNERATION POLICY
Description	The objective of the Remuneration Policy is to maximize the value of the Company by enhancing and adopting procedures of continuous improvement, evolution, high performance & commitment, taking into account all parties involved, being thus in line with and contributing to the Company's business strategy. It aims to attract and retain highly qualified executives from the international market. Moreover, it helps prevent or minimize conflict of interest situations and promotes sound and effective risk management while discouraging excessive risk taking, as long as pay is not related to achieving excessive profits but to the firm's steady growth path.
Scope	Company
Accountable for Implementation	Remuneration Committee
Internationally Recognized Instruments	N/A
Availability	Corporate Website

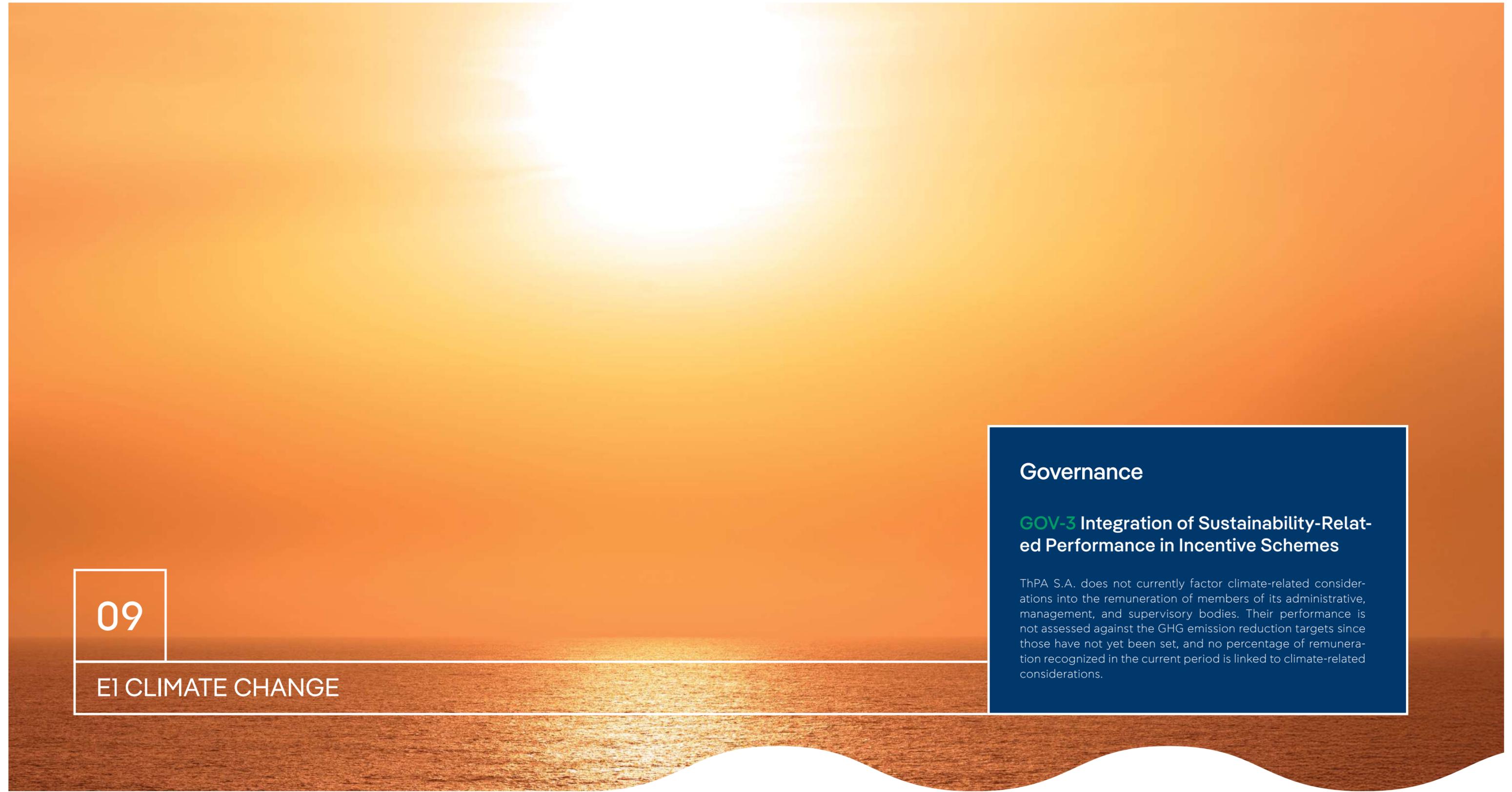
Policy	RISK MANAGEMENT POLICY
Description	<p>The purpose of the Risk Management Policy is to establish the framework under which the Company can identify, assess and manage the risks associated with its activities, processes and operating systems. More specifically, the Risk Management Policy of the Company aims at:</p> <ul style="list-style-type: none"> Aligning its risk management strategy with the strategic goals of the Board of Directors. Establishing unified risk management procedures. Minimizing the level of possible and/or actual losses associated with the following risk categories: <ol style="list-style-type: none"> Business Continuity Information Security & Resilience Reputation & Credibility Health & Safety Legislative/Regulatory compliance Financial State & Charges Environmental Compliance.
Scope	Company
Accountable for Implementation	Compliance and Risk Management Officer
Internationally Recognized Instruments	N/A
Availability	Corporate Intranet

Policy	ICT SECURITY POLICY
Description	ThPA S.A. enforces an ICT Security Policy to protect company data and systems, ensuring confidentiality, integrity, availability, and privacy. Aligned with ISO/IEC 27001, it sets controls against threats and maintains a strong security framework.
Scope	Company, Local communities, Consumers and end-users
Accountable for Implementation	ICT & DT Director
Internationally Recognized Instruments	ISO 27001
Availability	Corporate Intranet

Policy	ANTI-BRIBERY POLICY
Description	<p>The Anti-Bribery Policy of ThPA S.A. implements a zero-tolerance policy in case of corruption and bribery. Its purpose is to provide a more general framework through which an effective System is established and implemented, which:</p> <ul style="list-style-type: none"> ensures compliance with applicable Greek and Community legislation. ensures understanding of the definition of bribery and the forms of bribery we encounter. takes into account the results of the bribery risk assessment to select the appropriate strategy. encourages confidential reporting of any incident or suspicion of bribery through specific means of communication. contributes to the vigilance of employees and associates for the recognition of actions related to bribery and the protection of the reputation of ThPA S.A. remains effective in achieving the goals and meeting the requirements of business continuity, while fully in line with the requirements of the International Standard ELOT EN ISO 37001:2016.
Scope	Company, Business Relationships
Accountable for Implementation	Compliance and Risk Management Officer
Internationally Recognized Instruments	ISO 37001
Availability	Corporate Intranet

MDR-A Actions and Resources in Relation to Material Sustainability Matters

ThPA S.A. 's actions related to material sustainability matters are detailed within the topical standards of its sustainability statement.



09

EI CLIMATE CHANGE

Governance

GOV-3 Integration of Sustainability-Related Performance in Incentive Schemes

ThPA S.A. does not currently factor climate-related considerations into the remuneration of members of its administrative, management, and supervisory bodies. Their performance is not assessed against the GHG emission reduction targets since those have not yet been set, and no percentage of remuneration recognized in the current period is linked to climate-related considerations.

Strategy

EI-1 Transition Plan for Climate Change Mitigation

A formal transition plan for climate change mitigation has not been yet adopted by ThPA S.A. The Company nevertheless considers it essential to be in line with climate-related targets and is reviewing its operational and strategic framework to align climate resilience and mitigation strategies. As a priority in ThPA S.A.'s strategic agenda, the formation of a comprehensive transition plan is in progress. ThPA S.A. intends to align this plan with the Paris Agreement objectives and applicable ESRS standards for sustainable operations and stakeholder alignment. A specific adoption date will be fixed after this preparatory phase ends.



SBM-3 Material Impacts, Risks and Opportunities and their Interaction with Strategy and Business Model

ThPA S.A. has adapted its strategy and business model to address climate change by integrating sustainability principles into its operations. The Company takes eco-social costs into account, such as greenhouse gas emissions from energy use, waste generation and the upgrading of infrastructure and systems. It also creates value by aligning its activities with sustainable development, innovation, and resource efficiency.

Recently, ThPA S.A. has modified its business model to better meet its climate change mitigation goals. For example:

- **Investing in Renewable Energy:**

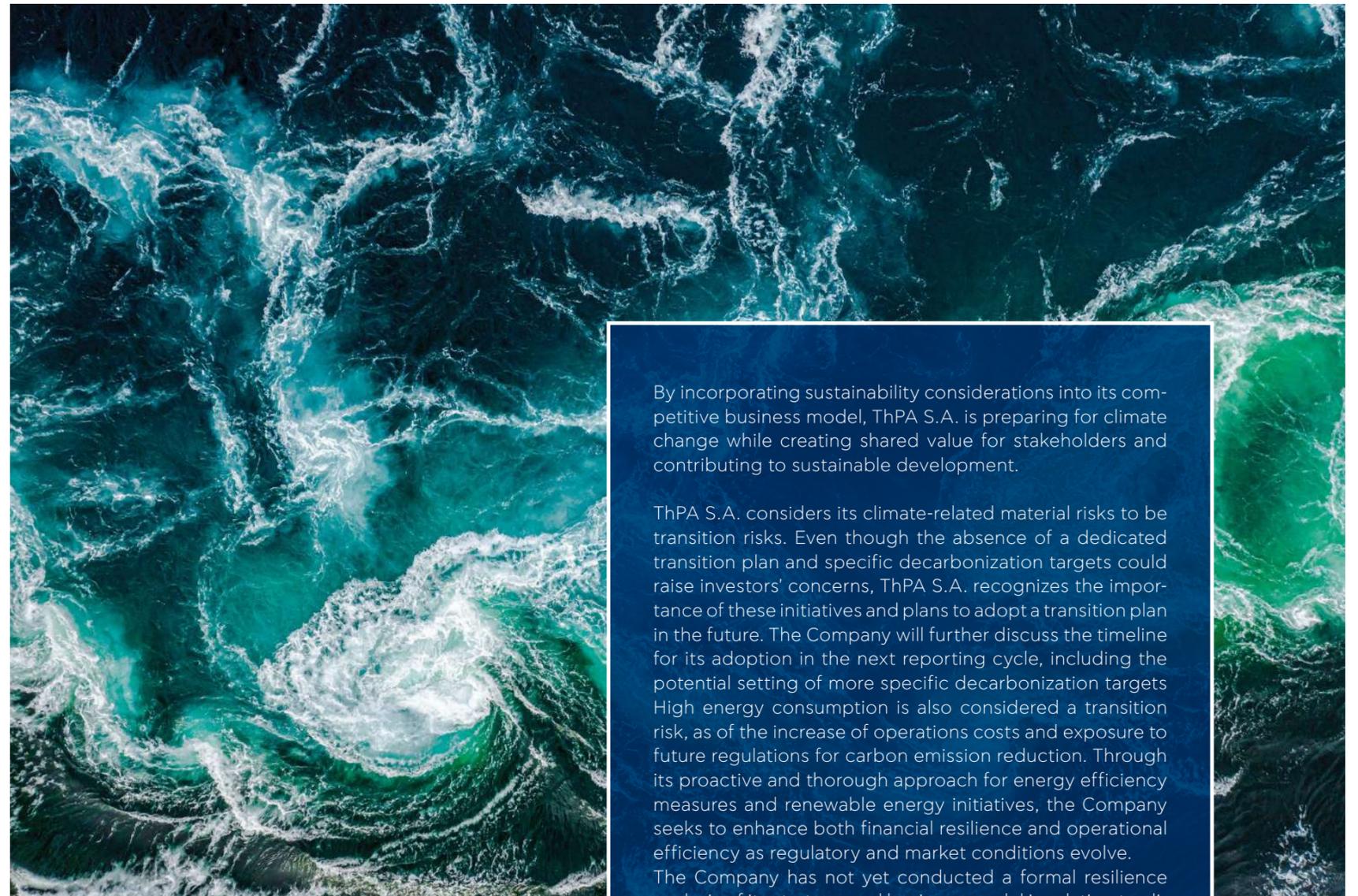
ThPA S.A. aims to reduce carbon emissions, achieve net-zero energy consumption, and support global climate goals.

- **Advanced Technologies for Emission Reduction:**

The Company is transitioning to hybrid equipment and purchasing machinery with specifications that allow it to significantly reduce operational emissions. This transition improves ThPA S.A.'s environmental performance and enhances its path towards more sustainable port operations.

- **Infrastructure Climate Resilience:**

ThPA S.A. is modernizing its infrastructure to address climate risks—particularly extreme weather conditions—and ensure operational continuity. Their risk management system includes floodwater management networks, salting roads during icy conditions, halting operations during high winds or extreme heat and upgrading infrastructure to withstand these challenges. These proactive measures protect key assets and support the Company's long-term sustainable operation.



By incorporating sustainability considerations into its competitive business model, ThPA S.A. is preparing for climate change while creating shared value for stakeholders and contributing to sustainable development.

ThPA S.A. considers its climate-related material risks to be transition risks. Even though the absence of a dedicated transition plan and specific decarbonization targets could raise investors' concerns, ThPA S.A. recognizes the importance of these initiatives and plans to adopt a transition plan in the future. The Company will further discuss the timeline for its adoption in the next reporting cycle, including the potential setting of more specific decarbonization targets. High energy consumption is also considered a transition risk, as of the increase of operations costs and exposure to future regulations for carbon emission reduction. Through its proactive and thorough approach for energy efficiency measures and renewable energy initiatives, the Company seeks to enhance both financial resilience and operational efficiency as regulatory and market conditions evolve. The Company has not yet conducted a formal resilience analysis of its strategy and business model in relation to climate change using climate scenario analysis as defined in ESRS 2 IRO-1. Yet the Company recognizes the importance of managing climate risks and opportunities in its strategic planning and risk management activities. Eventually ThPA S.A. plans to integrate a resilience analysis into its overall climate-related strategy following best practice and regulatory requirements. This analysis includes scenario-based assessments of how different climate pathways might affect the Company's operations, financial performance, and long-term strategy. ThPA S.A. intends to start this process in the coming years and disclose the results in subsequent reporting cycles.

Impact, Risk and Opportunity Management

E1-2 Policies Related to Climate Change Mitigation and Adaptation



ThPA S.A. has implemented policies to manage its material impacts, risks and opportunities related to climate change mitigation and adaptation. The Environmental Policy promotes sustainable development through eco-friendly services and is supported by an ISO 14001:2015 certified Environmental Management System. This system ensures compliance with national and EU regulations, pollution prevention and continuous improvement of environmental performance. Environmental aspects and impacts are identified, monitored and controlled by ThPA S.A., enabling the Company to anticipate and address environmental challenges. Through corrective actions, internal audits and management reviews, ThPA S.A. builds operational resilience and supports climate change mitigation. The policy is regularly reviewed, updated, and published.

The Sustainability Policy aligns with ThPA S.A.'s goals for energy efficiency, climate change mitigation, and air quality management. It focuses on reducing direct GHG emissions from fossil fuel consumption and indirect emissions from electricity generation. To limit its climate impact, ThPA S.A. has established environmental monitoring programs, implemented energy-efficient measures in its operations and buildings and continually improves energy consumption practices. The policy integrates the Company's Environmental and Energy Management Systems in line with ISO 14001: 2015 and ISO 50001: 2018 standards, helping to manage energy consumption and carbon emissions.

This proactive approach ensures compliance with regulations, supports global sustainability targets, and prepares the Company for a low-carbon economy transition.

The Energy Management Policy addresses the current energy and climate crisis by reducing the port's energy footprint and GHG emissions. By implementing the ISO 50001: 2018 standard, this policy sets energy targets, monitors performance and fosters an energy-efficient culture through staff training. It directly contributes to climate change mitigation by reducing energy consumption and enhancing energy efficiency in operations.

Additionally, the Procurement Regulation ensures that suppliers meet environmental, safety, social, labor and international sustainability standards. This approach aligns the port's supply chain with ThPA S.A.'s broader climate and sustainability goals by embedding sustainability in procurement practices.

These policies collectively address key issues related to climate change mitigation, energy efficiency and GHG emission reduction, ensuring that ThPA S.A. minimizes its climate impact over the long term. They are regularly reviewed to ensure compliance with legal and regulatory requirements as well as to support the Company's long-term climate change goals. Currently, ThPA S.A.'s policies do not include renewable energy generation, as the company has not yet engaged in renewable energy production. However, as ThPA S.A. intends to explore renewable energy deployment, the integration of relevant considerations into its policies will be evaluated in order to align with future initiatives.

ThPA S.A. gathers feedback regarding its policies from stakeholders and evaluates whether their interests and expectations can be incorporated into policy development. This approach ensures that policies align with stakeholder concerns while remaining consistent with ThPA S.A.'s strategic priorities and operational framework.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.



E1-3 Actions and Resources in Relation to Climate Change Policies

Actions regarding GHG emission reductions are being implemented by ThPA S.A.. Central to this effort is the plan to transition to low-emission and hybrid equipment in the near future, resulting in a substantial reduction in liquid fuel use. In addition to this, ThPA S.A. is planning to install photovoltaic (PV) panels on warehouse rooftops in the near future, to achieve a net-zero electric energy consumption balance. In addition, ThPA S.A. has developed and is implementing an Environmental Management System (EMS) for all port activities certified in accordance with ISO 14001: 2015 International Standard. Respecting relevant national and European regulations and principles of ISO 14001: 2015, ThPA S.A. identifies, evaluates, and manages the environmental aspects and impacts of its operations. The Company creates environmental programs and sets performance indicators.

Energy consumption is a significant operational aspect of ThPA S.A.'s activities. To address this, ThPA S.A. has established an Energy Management System (EnMS), in accordance with the requirements of ISO 50001: 2018, to monitor, manage and reduce energy consumption. The Company has also installed an electricity consumption monitoring system (supported by ABB Ability, an innovative software solution that empowers real time, data-driven decisions for safer, smarter operations that maximizes resource efficiency and contributes to a low carbon future) at its highest electric energy-consuming substation, which monitors continuously and remotely all individual asset energy consumption. For tenants there is an internal metering system as well, where electricity usage is recorded through the system and monthly bills are generated. Besides, ThPA S.A. provides an internal fueling station for liquid fuels and equips all liquid-dependent vehicles with monitoring rings. With this system, fuel consumption can be tracked per vehicle - highlighting inefficiencies and potentials for improvement.

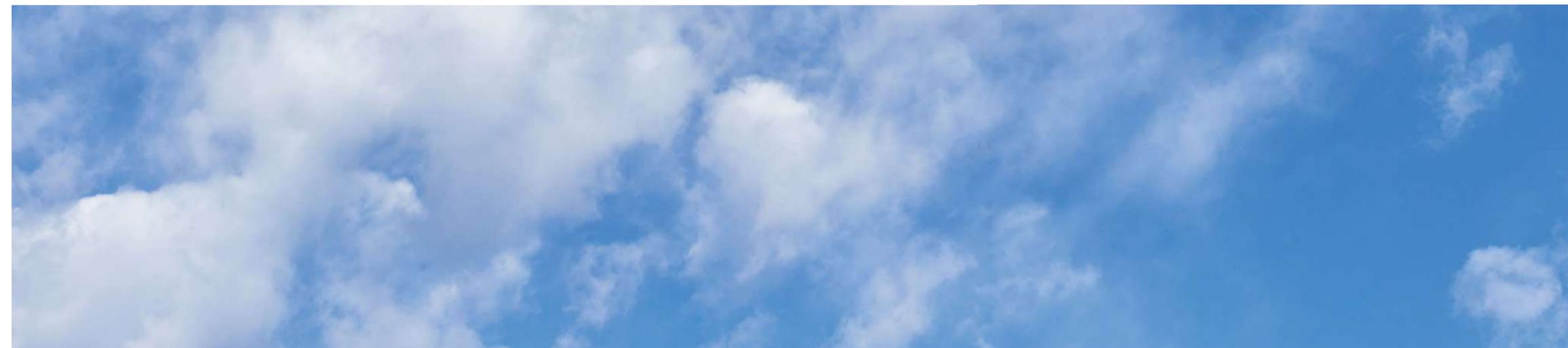
ThPA S.A. has launched multiple energy efficiency initiatives, including the replacement of high-pressure sodium lamps with LED lighting on outdoor masts, which significantly reduces electricity consumption. Additional actions include the completion of a building energy retrofit study with recommendations currently under review and plans to acquire new ground equipment with high energy efficiency. The use of electricity analyzers that have been installed on four cranes provides critical energy consumption data, supporting further efficiency improvements. Employee training on the proper use of machinery and vehicles further supports energy efficiency goals.

In line with ThPA S.A.'s climate actions, a wireless reefer monitoring system has been implemented in the Port of Thessaloniki. It captures real-time container temperature, alarms, and power consumption, which enhances operational efficiency and minimizes energy loss. Through the implementation of smart technologies, the Company supports the transition into a sustainable, energy-efficient business model which allows for differentiation in service provision against their peers in accordance with their climate change mitigation policies.

ThPA S.A. remains committed to fulfilling its obligations under Greece's National Climate Law (Law 4936/2022), which requires the establishment of specific targets and compliance with existing legislation. To this end, ThPA S.A. has adopted the principles of ISO 14064: 2018 and the Greenhouse Gas Protocol to measure its CO₂ equivalent (CO₂e) emissions. ThPA S.A. continuously tracks and reports emissions derived from its operations.

ThPA S.A.'s climate change mitigation actions are categorized by decarbonization levers as follows:

- **Energy Efficiency:**
Replacement of high-pressure sodium lamps with LED lighting; building energy retrofit study; targeted employee training on equipment usage; continuous analysis of energy consumption using electricity analyzers on cranes and telemetric equipment across all buildings.
- **Electrification:**
Use of hybrid technology for port machinery and the acquisition of high-efficiency ground equipment.
- **Fuel Switching:**
Transition from diesel to hybrid equipment, resulting in a substantial reduction in fuel usage.
- **Renewable Energy:**
Installation of photovoltaic panels on warehouse rooftops, supporting a transition to renewable energy sources and the creation of a net-zero energy balance for the associated facilities.



Outcome of Actions

The outcome of ThPA S.A.'s actions on climate change mitigation is reflected in measurable progress toward GHG emission reductions and energy efficiency. The key outcomes include:

- **Reduction in Diesel Consumption:**

Liquid fuel use is expected to be significantly reduced by replacing high-diesel-consumption machines with hybrid or electric equipment.

- **Energy Savings:**

The replacement of high-pressure sodium lamps with LED lighting reduces energy consumption, while electricity analyzers and telemetric equipment give real-time overview of consumption patterns.

- **Net-Zero Energy Consumption Balance:**

The installation of photovoltaic panels on warehouse rooftops aims to achieve a net-zero electric energy balance, further supporting GHG reduction objectives.

ThPA S.A.'s climate-related actions are continually reviewed and improved to ensure alignment with regulatory requirements, such as the Greece's National Climate Law and the requirements of ISO 14064-1:2018. Through the use of internal audits, management reviews, and corrective actions, ThPA S.A. ensures that actions remain effective and that resources are directed toward impactful climate change mitigation measures. Progress is tracked through quantitative performance indicators for GHG emissions, energy consumption, and fuel use, which are systematically reviewed as part of ThPA S.A.'s ongoing improvement cycle, demonstrating ThPA S.A.'s long-term commitment to climate change mitigation and operational resilience. While ThPA S.A. has not set specific GHG reduction targets, but the implementation of the aforementioned actions is expected to contribute to a reduction in emissions over time. The impact of these actions is monitored through the Company's tracking mechanisms, providing insight into the effectiveness of its climate-related initiatives. ThPA S.A. is willing to examine the possibility of setting clear GHG reduction targets that derive from relevant actions with 2024 being their baseline year.

ThPA S.A. has ensured that resources are readily available for critical port operations and projects. The Company has established clear mechanisms to reallocate resources from other areas when needed, ensuring that emerging priorities are addressed promptly. This proactive approach ensures that resource availability does not obstruct the implementation of its plans. Furthermore, ThPA S.A. maintains consistent access to affordable financing, enabling the port to secure necessary capital or obtain funding at reasonable costs. This access is vital for supporting its operational activities and investments, allowing ThPA S.A. to execute initiatives effectively while remaining adaptable to financial or operational challenges.

ThPA S.A.'s initiatives, whether implemented or planned, do not entail substantial Capital Expenditures (CapEx) or Operational Expenditures (OpEx). As a result, they are not linked to specific line items or notes in the financial statements.

Capital and operating expenditures reflect the initiatives to reduce emissions from its own operations and achieve decarbonization. As part of the compliance with the EU Taxonomy regulation, required under Commission Delegated Regulation (EU) 2021/2178, the Company has started assessing the alignment of its activities with the Technical Screening Criteria (TSC), the Do No Significant Harm (DNSH) principle and the Minimum Social Safeguards (MSS).

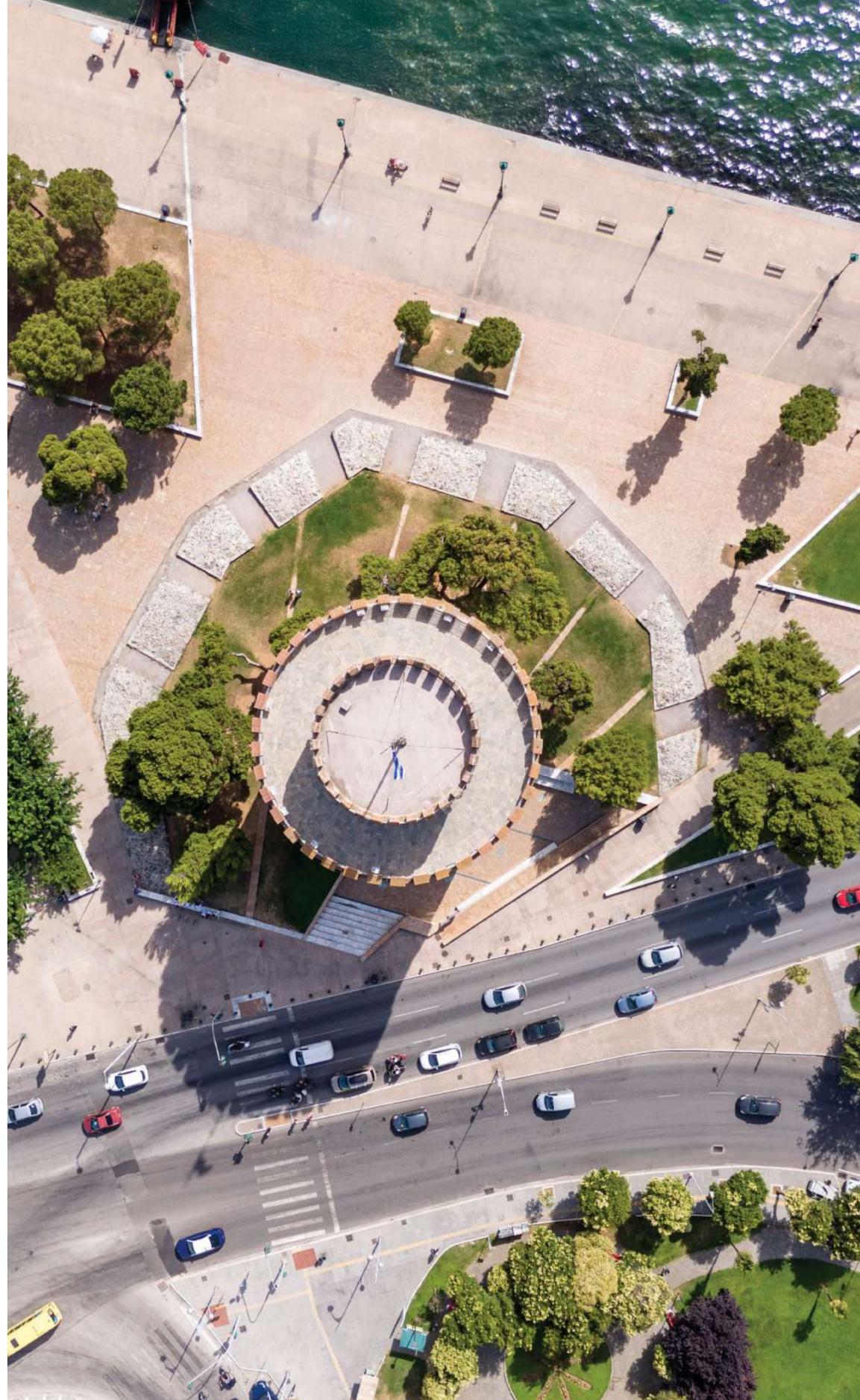
Metrics and Targets

EI-4 Targets Related to Climate Change Mitigation and Adaptation

Although ThPA S.A. has not yet set measurable, outcome-oriented targets for Climate Change Mitigation and Energy, the Company actively tracks the impact of its policies and actions. This is done through mechanisms such as GHG emissions quantification in accordance with ISO 14064: 2018 for Scope 1 & Scope 2 emissions. Monitoring tools such as energy consumption trackers and an internal fuel tracking system provide continuous data, helping identify high-consumption assets for efficiency improvements.

While formal targets are yet to be established, ThPA S.A. is committed to reducing Scope 1 and Scope 2 emissions through operational changes and technological upgrades. This includes replacing high-emission diesel machines with hybrid or electric models and installing photovoltaic panels across warehouses for a net-zero electricity balance. To improve energy efficiency, the Company has implemented LED lighting upgrades, uses electricity analyzers on cranes, and adopted ABB Ability software to optimize energy use.

Progress is tracked through both qualitative and quantitative indicators, including CO₂e emissions from Scopes 1 and 2, energy consumption metrics, and operational improvements. Periodic reviews and audits of the Energy Management System under ISO 50001:2018 ensure that any areas for improvement are addressed, supporting the alignment with regulatory obligations and international best practices.



Energy Consumption and Mix	Unit	2024
Fuel consumption from coal and coal products	MWh	—
Fuel consumption from crude oil and petroleum products	MWh	19,176.652
Fuel consumption from natural gas	MWh	860.756
Fuel consumption from other fossil sources	MWh	—
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	—
Total fossil energy consumption	MWh	20,037.408
<i>Share of fossil sources in total energy consumption</i>	%	63.78
Consumption from nuclear sources	MWh	—
<i>Share of consumption from nuclear sources in total energy consumption</i>	%	—
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	—
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	11,379.216
Consumption of self-generated non-fuel renewable energy	MWh	—
Total renewable energy consumption	MWh	11,379.216
<i>Share of renewable sources in total energy consumption</i>	%	36.22
Total energy consumption	MWh	31,416.624

Note: Energy consumption metrics are based on direct measurements from electricity bills and fuel consumption invoices. Conversion of energy units follows the National Climate Law, with kilowatt-hours (kWh) converted to megawatt-hours (MWh) and fuel consumption in liters converted to MWh. The metrics have not yet been validated by an external body. However, validation is scheduled for early April 2025 as part of the ISO 50001 certification process. It is also worth noting that in 2024, ThPA S.A. purchased electricity bundled with Guarantees of Origin (GOs) for 100% of its consumption, ensuring that the energy used is attributed to renewable sources.

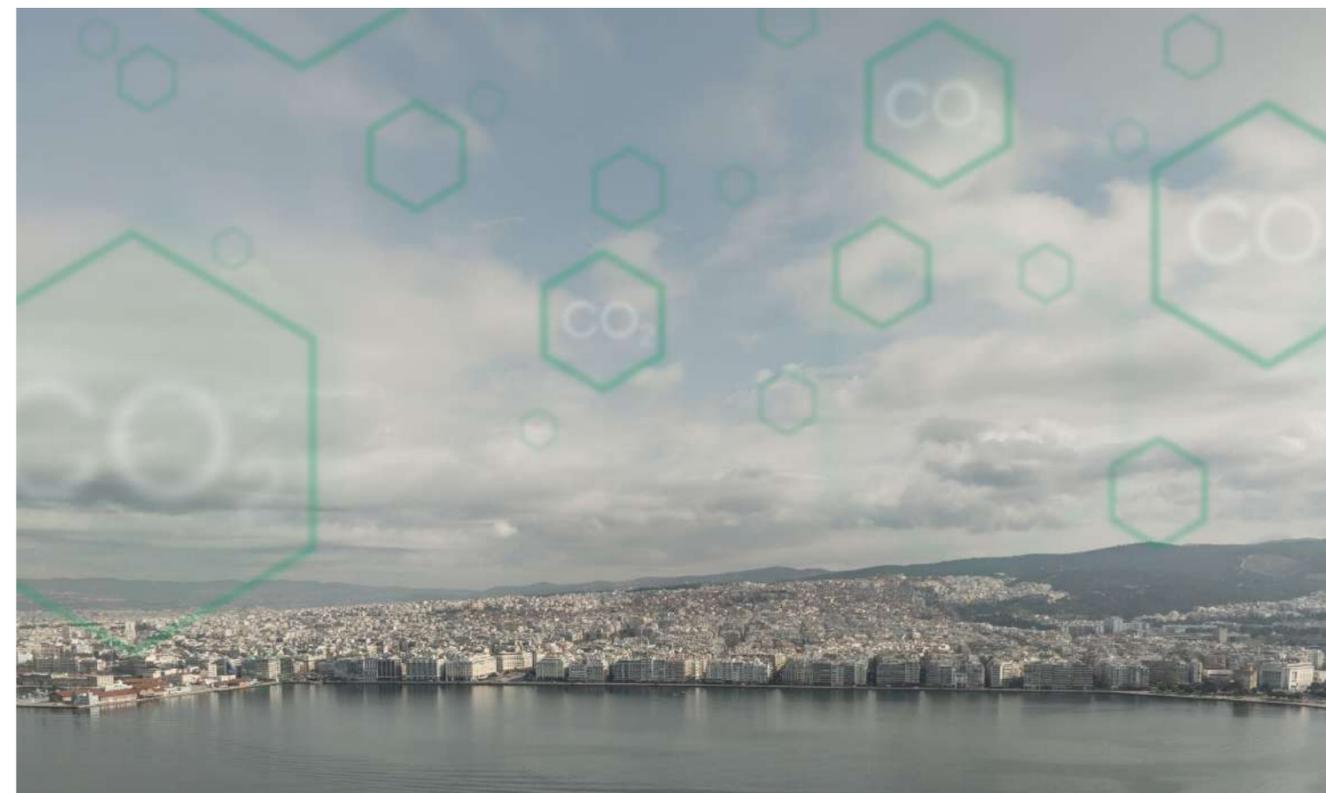
Energy Intensity Per Net Revenue	Unit	2024
Total energy consumption from activities in high climate impact sector	MWh	31,416.624
Net revenue from activities in high climate impact sectors	million euros	100.52
Energy intensity	MWh/million euros	312.54

The high climate impact sectors used to determine energy intensity are based on the Company's activities classified under the following NACE codes: H52.2.1 (Service activities incidental to land transportation), H52.2.2 (Service activities incidental to water transportation), and H52.2.4 (Cargo handling). However, the Company does not disaggregate net revenue by sector and the energy intensity calculation is based on the total net revenue of the Company.

The net revenue used in the calculation is derived from the overall net revenue of the Company, as disclosed in the financial statements. Since there is no specific categorization of net revenue from high climate impact sectors in the financial statements, a detailed reconciliation to relevant line items or notes is not available for this reporting year.

EI-6 Gross Scopes 1, 2, 3 and Total GHG Emissions

Gross Scopes 1, 2, 3 & Total GHG Emissions	Unit	2024
Scope 1 GHG emissions		
Total Scope 1 emissions	tCO ₂ eq	5,948.99
Percentage of Scope 1GHG emissions from regulated emission trading schemes	%	—
Scope 2 GHG emissions		
Scope 2 location-based emissions	tCO ₂ eq	5,685.08
Scope 2 market-based emissions	tCO ₂ eq	0
Total GHG emissions		
Total GHG emissions (location-based)	tCO ₂ eq	11,634.07
Total GHG emissions (market-based)	tCO ₂ eq	5,948.99
GHG emissions intensity		
GHG emissions intensity, location-based (total GHG emissions per net revenue)	tCO ₂ eq/per million euros	115.74
GHG emissions intensity, market-based (total GHG emissions per net revenue)	tCO ₂ eq/per million euros	59.18
Net revenue	million euros	100.52
Net revenue used to calculate GHG intensity	million euros	100.52
Total energy consumption	MWh	31,416.624



The Company plans to measure Scope 3 emissions in 2025, but this category is currently excluded from the emissions reporting.¹ As 2024 is the first year of reporting under ESRS and serves as the base year for GHG emissions, there are no significant changes in the definition of what constitutes the reporting undertaking and its upstream and downstream value chain. Any future significant changes in the Company's reporting boundary or value chain will be disclosed along with their impact on the comparability of reported emissions.

ThPA S.A.'s Scope 2 GHG emissions are associated with the purchase of electricity used to support its business activities. This includes electricity consumed from the grid for powering offices and other electric equipment such as cranes. In calculating Scope 2 emissions, the Company has applied the country-specific and market specific emission factors of the power system using a location-based and a market-based model, ensuring the emissions are accurately aligned with the regional grid's and the provider's emission profile.

ThPA S.A.'s calculation methodology for GHG emissions follows the methodology outlined in the National Climate Law and aligns with ISO 14064-1: 2018 for Scopes 1 and 2 ensuring consistency with internationally recognized standards. Emission factors are sourced from the official guidelines of the Ministry of Environment and Energy, the National Inventory Report (NIR) and DAPEEP. In particular, Scope 2 market-based emissions were calculated using a market-based approach, employing the emissions intensity index provided by DAPEEP for 2023. This index considers the average emission intensity of the network, derived from the Residual Energy Mix, as detailed in DAPEEP's 2023 energy mix report. For location-based Scope 2 emissions, the remaining energy mix of the country is used, reflecting the national grid's overall emissions. Scope 3 emissions were not calculated for the reporting year. Scope 1 and 2 GHG emissions have not yet been validated by an external body. However, they will be validated later this year, in compliance with the National Climate Law.

¹ These changes in the scope of the value chain and the exclusion of Scope 3 emissions will affect the comparability of reported GHG emissions year to year, with plans for Scope 3 emissions to be included in the future.

According to Appendix C of the Commission Delegated Regulation (EU) 2023/2772, companies with an average of no more than 750 employees on their balance sheet date during the financial year (on a consolidated basis, if applicable) are permitted to exclude data points on Scope 3 emissions and total GHG emissions in the first year of preparing their sustainability statement. As ThPA S.A. meets this criterion, it may omit data points related to Scope 3 emissions.

The net revenue used in the GHG emissions intensity calculation is derived from the financial statements, as disclosed in the relevant section of the annual report.

EI-7 GHG Removals and GHG Mitigation Projects Financed Through Carbon Credits

In ThPA S.A., there are no GHG removals and storage from projects developed in own operations or contributed to in its upstream or downstream value chain.

EI-8 Internal Carbon Pricing

In ThPA S.A., there are no internal carbon pricing schemes taking place.

Disclosures Pursuant to Article 8 of the EU Regulation 2020/852 (“EU Taxonomy Regulation”)

Introduction to the Regulation (EU) 2020/852

The Regulation (EU) 2020/852 (hereinafter “the EU Taxonomy Regulation”) represents a fundamental element of the European Union’s sustainable finance agenda. It establishes a uniform classification framework to determine which economic activities can be considered environmentally sustainable, thereby providing clarity and consistency for financial markets, businesses, and policymakers. The EU Taxonomy Regulation aims to redirect capital flows toward sustainable investments, supporting the EU’s commitment to climate neutrality by 2050 and the objectives of the European Green Deal.

The regulation establishes six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Pollution prevention and control
5. Transition to a circular economy
6. Protection and restoration of biodiversity and ecosystems

Under the framework of the EU Taxonomy Regulation, the European Commission is empowered to adopt Delegated Acts to supplement and operationalize the core provisions of the Regulation. These Delegated Acts play a critical role in providing the detailed technical criteria necessary to determine whether specific economic activities qualify as environmentally sustainable. The Delegated Acts set out the Technical Screening Criteria (TSC) for each environmental objective, specifying:

- The thresholds and conditions under which an activity is considered to contribute substantially to an environmental objective;
- The conditions for ensuring that the activity does not cause significant harm (DNSH) to other objectives; and
- The relevant performance indicators and compliance benchmarks.

In accordance with the Commission Delegated Regulation 2021/2178 of 6 July 2021 supplementing the Taxonomy Regulation (hereinafter “Disclosures Delegated Act”) and the criteria established by the Taxonomy Regulation Delegated Acts for each environmental objective, ThPA S.A. (hereinafter “the Company”) has assessed its activities for the 2024 reporting period, in terms of eligibility and alignment, incorporating the current market perception. More specifically, the report presents both eligible and non-eligible activities, as well as aligned and non-aligned activities for the reporting period ending on 31 December 2024. The disclosures incorporate data collected from ThPA S.A. and ThPA Sofia, entities that will be referred to as “the Company” for the purposes of these disclosures.

Application of the Taxonomy Regulation to ThPA S.A.

ThPA S.A. is responsible for the administration, management, and development of the Port of Thessaloniki, one of the largest and most strategic ports in Southeast Europe. The Company plays a pivotal role in facilitating trade and logistics across the Balkans and broader Southeast European region, serving as a key gateway between Europe, Asia, and the Eastern Mediterranean.

In order to identify the eligible and aligned activities, the Company has carried out a comprehensive review of activities and determined which of them can make a significant contribution to the six environmental objectives. The Company’s primary potentially eligible activity under the EU Taxonomy Regulation includes the activity 6.16. Infrastructure enabling low carbon water transport.

Description of Activity 6.16. Infrastructure Enabling Low Carbon Water Transport

The Company operates port infrastructure that supports the transition to low-carbon water transport by enabling the use of vessels with lower greenhouse gas (GHG) emissions. In line with the EU Taxonomy Regulation, the Company has assessed the eligibility and alignment of its primary business under activity “6.16 Infrastructure enabling low carbon water transport”, as defined in the Climate Delegated Act. Following the technical screening criteria, the Company considers the activity aligned with the EU Taxonomy, as its infrastructure investments facilitate the transition to low-carbon maritime transport by providing onshore power supply (OPS) to reduce emissions from docked vessels. In addition, the infrastructure and facilities are used for transferring freight between different transport modes, including terminals and structures for loading, unloading and transshipment of goods.

The activity has been assessed to ensure that it does not cause significant harm to other environmental objectives, including biodiversity protection, sustainable water and marine resource management, circular economy and pollution prevention. Based on the above, Turnover and Capital Expenditure (CapEx) related to this activity are included in the aligned EU Taxonomy KPIs, as they contribute to the decarbonization of port operations and water transport.



Information on Assessment of Compliance with the Regulation (EU) 2020/852

The Company has identified the following eligible activities contributing to Climate Change Mitigation (CCM), Transition to a Circular Economy (CE) and Pollution Prevention and Control (PPC), as derived from its Turnover, Capital Expenditures (CapEx) and Operational Expenditures (OpEx):

2.1 Collection and Transport of Hazardous Waste

The Company contributes to the collection and transport of hazardous waste, emphasizing the safe and efficient handling of such waste prior to treatment, material recovery, or disposal. This includes the operation and upgrading of processes dedicated to hazardous waste management. Operating Expenditure (OpEx) associated with activity 2.1. is applicable, contributing to Pollution Prevention and Control (PPC) objective through effective hazardous waste management practices. Activity 2.1. is assessed by the Company as aligned with the EU Taxonomy Regulation. The Company conducts this activity in full compliance with all relevant environmental legislation and best practices, ensuring the safe, controlled, and traceable collection and transportation of hazardous waste according to the applicable legislation. Moreover, it has been verified that the activity does not cause significant harm to any of the other environmental objectives, in accordance with the Do No Significant Harm (DNSH) criteria.

2.3 Collection and Transport of Non-Hazardous and Hazardous Waste

The Company extends its expertise to the collection and transport of non-hazardous and hazardous waste, focusing on activities aimed at preparing waste for reuse or recycling. Turnover associated with activity 2.3. is applicable, aligning with Transition to a Circular Economy (CE) objective by promoting efficient waste management practices and enhancing resource recovery. Activity 2.3. is considered aligned with the requirements of the EU Taxonomy

Regulation. The activity makes a substantial contribution to the environmental objective of circular economy through the safe, controlled, and compliant collection and transportation of both hazardous and non-hazardous waste, ensuring their appropriate management and disposal. The Company operates in full compliance with the relevant Technical Screening Criteria (TSC), adhering to all applicable regulatory frameworks and environmental standards. Furthermore, the activity does not cause significant harm to any of the other environmental objectives, in line with the Do No Significant Harm (DNSH) criteria.

4.1 Electricity Generation Using Solar Photovoltaic Technology

The Company is engaged in the generation of electricity using solar photovoltaic (PV) technology. Capital Expenditure (CapEx) associated with Activity 4.1. is applicable, contributing to Climate Change Mitigation (CCM) objective by supporting the transition to renewable energy sources. However, the activity has been assessed as not aligned with the provisions of the EU Taxonomy Regulation. While electricity generation from solar PV contributes substantially to climate change mitigation, the Company's assessment determined that it does not fully meet the required Technical Screening Criteria (TSC) for alignment, as the solar panels have not yet been installed.

4.9 Transmission and Distribution of Electricity

The Company is involved in the operation of transmission and distribution systems designed to transport electricity across medium-voltage and low-voltage networks. Capital Expenditure (CapEx) associated with activity 4.9. is applicable, contributing to Climate Change Mitigation (CCM) objective by promoting sustainable energy distribution and strengthening the resilience of electricity infrastructure. Activity 4.9. is assessed by the Company as aligned with the provisions of the EU Taxonomy Regulation. The activity contributes substantially to the environmental objective of climate change mitigation, as it enables the efficient and reliable distribution of electricity, including electricity generated from renewable sources. The Company ensures full compliance with the applicable Technical Screening Criteria (TSC), demonstrating that the infrastructure and operations support the transition to a low-carbon energy system and meet the required thresholds. In addition, it has been confirmed that the activity does not cause significant harm to any of the other environmental objectives, in line with the Do No Significant Harm (DNSH) criteria.

6.2 Freight Rail Transport

The Company engages in the purchase, financing, leasing, rental and operation of freight transport services on mainline rail networks and short line freight railroads. These activities provide efficient, low-carbon alternatives for the movement of goods, reducing road congestion and lowering greenhouse gas emissions. Turnover associated with activity 6.2. is eligible, contributing to Climate Change Mitigation (CCM) by supporting the transition to more sustainable and energy-efficient transport solutions.

6.3 Urban and Suburban Transport, Road Passenger Transport

The Company focuses on the purchase, financing, leasing, rental, and operation of urban and suburban transport vehicles for passengers, aiming to provide efficient and sustainable road transport solutions. These activities help reduce traffic congestion and emissions in urban areas, offering a cleaner alternative to private car use. Turnover associated with activity 6.3. is aligned, supporting Climate Change Mitigation (CCM) by enhancing urban mobility sustainability and promoting the use of low-emission transport options. Activity 6.3. is assessed as aligned with the requirements of the EU Taxonomy Regulation. This activity contributes substantially to the environmental objective of climate change mitigation by promoting low-emission mobility solutions and reducing reliance on private vehicle use. The Company ensures compliance with the applicable Technical Screening Criteria (TSC), demonstrating that vehicles and transport services meet established emissions thresholds and support the shift towards sustainable urban mobility. Furthermore, the activity has been confirmed not to cause significant harm to any other environmental objectives, in accordance with the Do No Significant Harm (DNSH) criteria.

6.5 Transport by Motorbikes, Passenger Cars and Light Commercial Vehicles

This activity refers to the purchase, leasing, rental, and operation of vehicles, including those used for the Company's operations. Capital Expenditure (CapEx) associated with activity 6.5. is eligible, contributing to Climate Change Mitigation (CCM) by reducing emissions from transport and promoting the adoption of more sustainable vehicle technologies.

6.6 Freight Transport Services by Road

This activity contributes to climate change mitigation by providing efficient freight transport services, reducing emissions from road transport, and supporting the transition to more sustainable logistics solutions. Turnover and Operating Expenditure (OpEx) associated with activity 6.6. are eligible, reflecting the Company's commitment to enhancing the sustainability of freight transport by road, contributing to Climate Change Mitigation (CCM) objective, and reducing the carbon footprint of goods movement.

6.11 Sea and Coastal Passenger Water Transport

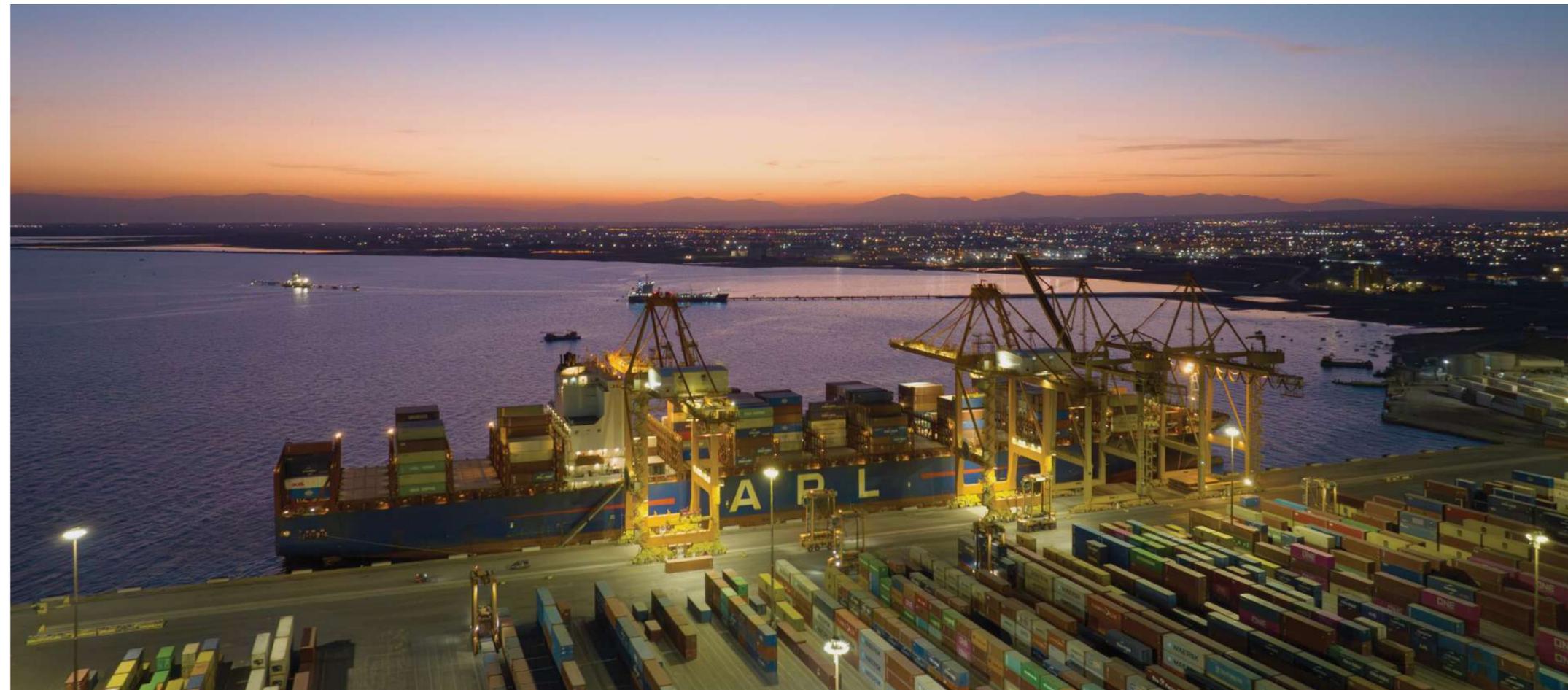
The Company provides expertise in sea and coastal passenger water transport, involving the purchase, financing, chartering and operation of vessels specifically designed and equipped for passenger transport on sea or coastal waters, whether scheduled or unscheduled. This category encompasses the operation of ferries, water taxis, excursion vessels, cruise ships and sightseeing boats. Turnover associated with activity 6.11. is considered eligible within climate change mitigation objective, as it directly supports the operational efficiency of passenger transport services.

7.3 Installation, Maintenance, and Repair of Energy Efficiency Equipment

This activity contributes directly to climate change mitigation by reducing greenhouse gas emissions and supporting the transition to a low-carbon economy. Capital Expenditure (CapEx) associated with this activity includes a significant portion of the Company's capital expenditure, which corresponds to new investments and maintenance costs for energy efficiency equipment, reflecting the Company's commitment to sustainable energy solutions and alignment with Climate Change Mitigation (CCM) objective. Activity 7.3. is assessed as aligned with the provisions of the EU Taxonomy Regulation. This activity contributes substantially to the environmental objective of climate change mitigation by facilitating the deployment and ongoing operational efficiency of technologies that reduce energy consumption and improve energy performance in the Company buildings and infrastructure. The Company ensures full compliance with the relevant Technical Screening Criteria (TSC), confirming that the equipment installed, and the associated services are in line with best practices for energy efficiency and contribute to measurable reductions in greenhouse gas emissions. Moreover, the activity does not cause significant harm to any other environmental objectives, in accordance with the Do No Significant Harm (DNSH) criteria.

7.7 Acquisition and Ownership of Buildings

This activity concerns the acquisition and ownership of buildings, recognizing as eligible the capital and operating expenses associated with all the Company's buildings. Both Capital Expenditure (CapEx) and Operational Expenditure (OpEx) associated with activity 7.7. are eligible, contributing to Climate Change Mitigation (CCM) objective by reducing emissions and fostering the adoption of new, more efficient buildings.



Do No Significant Harm (DNSH)

In line with its commitment to sustainability and the goals of the EU Taxonomy Regulation and the Do No Significant Harm principle, the Company recognizes the importance of assessing and managing climate-related risks. To ensure the long-term resilience and adaptability of the Company's operations, a comprehensive climate risk assessment is conducted, incorporating both physical risks (risks arising from climate change impacts) and transition risks (risks associated with the shift towards a low-carbon economy). Further information about climate risk assessment is available in the section E1 Climate change, subsection "SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model".

Minimum Social Safeguards

In order for an economic activity to be considered aligned with the EU Taxonomy Regulation, it must be verified that the Company complies with the minimum social safeguards, as defined in Article 18 of the Regulation. These minimum safeguards refer to the policies and procedures implemented by the Company to ensure adherence to the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. They also encompass the principles and rights enshrined in the eight fundamental conventions identified in the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as the provisions of the International Charter of Human Rights. In contrast to the first two alignment criteria — substantial contribution and do no significant harm — compliance with the minimum safeguards is evaluated at Company level, rather than at the level of individual economic activities.

The European Taxonomy recognizes four main pillars for which compliance with minimum social safeguards must be ensured, namely:

- **Human and Labor Rights**
- **Fair Competition**
- **Anti-Corruption and Bribery**
- **Taxation**

The Company has thoroughly reviewed all four of the aforementioned pillars and has implemented the necessary procedures and policies to ensure full compliance. The Company consistently applies these procedures across its operations to uphold the principles outlined in the EU Taxonomy Regulation, thereby ensuring alignment with the minimum social safeguards.

Human and Labor Rights

The Company is fully committed to complying with internationally recognized human and labor rights legislation, including the principles outlined in the United Nations Global Compact. To ensure an inclusive, non-discriminatory, and equitable working environment, the Company has established a comprehensive policy promoting equality, diversity, and inclusion (Diversity Policy). Additionally, a policy addressing violence and harassment in the workplace (Policy to prevent and combat violence and harassment) has been implemented with a strong emphasis on respect and equality. The Company's Procurement Regulation defines the expectations placed on suppliers in terms of corporate responsibility, covering key areas such as labor practices, health and safety, environmental protection, and ethical behavior.

It is important to note that, during 2024, no incidents of human or labor rights violations were recorded. Furthermore, no complaints related to human rights abuses, forced labor, or child labor were registered. The Company remains committed to the protection of whistleblowers, ensuring that all incidents are thoroughly investigated and that complaints are addressed through appropriate actions.

Fair Competition

The Company upholds fair competition as a fundamental pillar of its operations. The Company's adherence to applicable legislation, coupled with the procedures it has established, forms the cornerstone of its business success. The Company is fully committed to complying with the legal framework set by the Greek state and to conducting its business according to ethical practices, ensuring that all activities align with relevant internal policies. All employees are required to engage in fair transactions with customers, suppliers, and competitors, ensuring that their actions are grounded in merit and fully aligned with the principles of fair competition.

No legal actions were taken against the Company in the assessment period for any anti-competitive behavior or monopolistic practices.

Anti-Corruption and Bribery

One of the values of the Company is that it always acts legally, morally, with integrity and respect for society and the environment. The Company has prepared a Whistleblowing Manual to prevent and detect violations of national and EU law. The Manual sets out the principles and framework through which the Company receives, evaluates, and investigates reports of irregularities, omissions or offenses brought to the attention of its employees, customers, suppliers, or any other interested party. The Manual forms an integral part of operational governance and is approved by the Company's Board of Directors. Having implemented the Anti-Bribery Management System, as well as the whistleblowing procedure, the Company manages to maintain a completed framework regarding anti-bribery and mitigation of potential risks.

The Company has not identified any incidents of corruption and bribery and therefore no fines have been imposed,

Taxation

The Company is committed to fully complying with all relevant tax laws and regulations. Where appropriate, and following a thorough risk assessment, the Company implements specific control measures across its operations to prevent and avoid tax violations and illegal activities. Consequently, the Company's approach to tax compliance is grounded in transparency, long-term sustainability. Tax risk management is addressed through a two-fold approach. Firstly, in-house tax procedures are implemented as outlined in Chapter 6 of the accounting procedure booklet (currently under approval). Secondly, and more significantly, the Company ensures compliance with tax legislation through an annual mandatory tax audit conducted by an independent chartered Tax Audit Company. Evidence of compliance is provided through the certification awarded by the audit company, which serves as a supporting document for any potential audits conducted by the Public Revenue Independent Authority.

In addition, supplementary evidence of tax compliance includes the tax clearance letter, which certifies that the Company does not have any outstanding liabilities to the Greek State. Finally, the Company affirms that it has never been convicted of tax evasion.

Accounting Policy

Turnover

Total turnover corresponds to net sales as shown in the consolidated financial statements.

Capital Expenditures (CapEx)

Total capital expenditure corresponds to additions/investments made during the financial year, as shown in the consolidated financial statements. It includes research and development capital expenditures, tangible assets on the balance sheet, intangible assets, before any revaluation, amortization, or impairment of their value or any change in their fair value, changes due to business combinations, as well as additions/changes in assets classified as rights-of-use in accordance with International Financial Reporting Standard 16 (IFRS16).

Operational Expenditures (OpEx)

Total operating expenses correspond to non-capital research and development expenses, building renovation expenses, short-term leases, maintenance and repair expenses and other indirect expenses for the day-to-day operation of tangible assets.

Double Counting

The aforementioned definitions of turnover, capital expenditure (CapEx), and operating expenditure (OpEx) constitute the basis for the calculation of the Company's eligible and aligned Key Performance Indicators (KPIs) in accordance with the EU Taxonomy Regulation. Supported by the Company's detailed financial statements and the thorough classification of capital and operating expenses, the Company confirms that the compliance assessment was carried out with rigor and accuracy, ensuring that double counting was effectively avoided throughout the process.

EU Taxonomy KPIs

Turnover

Proportion of Turnover from products or services associated with Taxonomy-aligned economic activities – Disclosure covering financial year 2024

ThPA Economic Activities	Code	Turnover (million)	Proportion of Turnover, Year 2024	Substantial Contribution Criteria						DNSH Criteria ('Does Not Significantly Harm')						Minimum Safeguards	Proportion of Taxonomy aligned (A.1.) or Eligible (A.2.) Turnover, year 2023	Category Enabling Activity	Category Transitional Activity
				Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity				
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Collection and transport of hazardous waste	2.1	0	0%	N/EL	N/EL	N/EL	Y	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	–	–
Collection and transport of non-hazardous and hazardous waste	2.3	1,696	1,68%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	–	–
Transmission and distribution of electricity	4.9	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Urban and suburban transport, road passenger transport	6.3	0,048	0,048	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	–	T
Infrastructure enabling low carbon water transport	6.16	52,760	52,760	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Installation, maintenance and repair of energy efficiency equipment	7.3	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Turnover of environmentally sustainable activities (Taxonomy aligned) (A.1)		54,504	54,15%	52,47%	0%	0%	0%	1,68%	0%	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling		0	52,42%	52,42%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	E	
Of which Transitional		0	0,05%	0,05%						Y	Y	Y	Y	Y	Y	Y	0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Electricity generation using solar photovoltaic technology	4.1	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Freight rail transport	6.2	0,490	0,49%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Transport by motorbikes, passenger cars and light commercial vehicles	6.5	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Freight transport services by road	6.5	0,419	0,42%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Sea and coastal passenger water transport	6.11	0,685	0,68%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Acquisition and ownership of buildings	7.7	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Turnover of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy aligned activities) (A.2)		1,594	1,59%	1,59%	0%	0%	0%	0%	0%								0%		
A. Turnover of Taxonomy eligible activities (A.1+A.2)		56,098	55,74%	54,06%	0%	0%	0%	1,68%	0%								0%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy non-eligible activities		44,554	44,26%																
Total (A + B)		100,652	100%																

CapEx

Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – Disclosure covering financial year 2024

ThPA Economic Activities	Code	CapEx (million)	Proportion of CapEx, year 2024	Substantial Contribution Criteria						DNSH Criteria ('Does Not Significantly Harm')						Minimum Safeguards	Proportion of Taxonomy aligned (A.1.) or Eligible (A.2.) CapEx, year 2023	Category Enabling Activity	Category Transitional Activity
				Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity				
A. TAXONOMY ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Collection and transport of hazardous waste	2.1	0	0%	N/EL	N/EL	N/EL	Y	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	–	–
Collection and transport of non-hazardous and hazardous waste	2.3	0	0%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	–	–
Transmission and distribution of electricity	4.9	0,168	2,68%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Urban and suburban transport, road passenger transport	6.3	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	–	T
Infrastructure enabling low carbon water transport	6.16	0,585	9,33%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Installation, maintenance and repair of energy efficiency equipment	7.3	0,255	4,07%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	0%	E	–
CapEx of environmentally sustainable activities (Taxonomy aligned) (A.1)		1,008	16,08%	16,08%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling		0	16,08%	16,08%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	0%	E	
Of which Transitional		0	0%	0,05%						Y	Y	Y	Y	Y	Y	Y	0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Electricity generation using solar photovoltaic technology	4.1	0,350	5,59%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Freight rail transport	6.2	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Transport by motorbikes, passenger cars and light commercial vehicles	6.5	0,227	3,62%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Freight transport services by road	6.6	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Sea and coastal passenger water transport	6.11	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
Acquisition and ownership of buildings	7.7	0,503	8,01%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0%		
CapEx of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy aligned activities) (A.2)		1,080	17,22%	17,22%	0%	0%	0%	0%	0%								0%		
A. CapEx of Taxonomy eligible activities (A.1+A.2)		2,088	33,30%	33,30%	0%	0%	0%	0%	0%								0%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy non-eligible activities		4,182	66,70%																
Total (A + B)		6,270	100%																

OpEx

Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – Disclosure covering financial year 2024

ThPA Economic Activities	Code	OpEx (million)	Proportion of OpEx, year 2024	Substantial Contribution Criteria						DNSH Criteria ('Does Not Significantly Harm')						Minimum Safeguards	Proportion of Taxonomy aligned (A.1.) or Eligible (A.2.) CapEx, year 2023	Category Enabling Activity	Category Transitional Activity	
				Climate change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity	Climate Change Mitigation	Climate change Adaptation	Water	Pollution	Circular Economy	Biodiversity					
A. TAXONOMY ELIGIBLE ACTIVITIES																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Collection and transport of hazardous waste	2.1	1,628	59,69%	N/EL	N/EL	N/EL	Y	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	–	–
Collection and transport of non-hazardous and hazardous waste	2.3	0	0%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	–	–
Transmission and distribution of electricity	4.9	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Urban and suburban transport, road passenger transport	6.3	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	–	T
Infrastructure enabling low carbon water transport	6.16	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	E	–
Installation, maintenance and repair of energy efficiency equipment	7.3	0	0%	Y	N/EL	N/EL	N/EL	N/EL	N/EL	Y	Y	Y	Y	Y	Y	Y	Y	0%	E	–
OpEx of environmentally sustainable activities (Taxonomy aligned) (A.1)		1,628	59,69%	0%	0%	0%	59,69%	0%	0%	Y	Y	Y	Y	Y	Y	Y	Y	0%		
Of which Enabling		0	0%	0%	0%	0%	0%	0%	0%	Y	Y	Y	Y	Y	Y	Y	Y	0%	E	
Of which Transitional		0	0%	0%						Y	Y	Y	Y	Y	Y	Y	Y	0%		T
A.2 Taxonomy-Eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
Electricity generation using solar photovoltaic technology	4.1	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%		
Freight rail transport	6.2	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%		
Transport by motorbikes, passenger cars and light commercial vehicles	6.5	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%		
Freight transport services by road	6.6	0,049	1,80%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%		
Sea and coastal passenger water transport	6.11	0	0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%		
Acquisition and ownership of buildings	7.7	0,151	5,53%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									0%		
OpEx of Taxonomy eligible but not environmentally sustainable activities (not Taxonomy aligned activities) (A.2)		1,200	7,33%	7,33%	0%	0%	0%	0%	0%									0%		
A. OpEx of Taxonomy eligible activities (A.1+A.2)		1,828	67,02%	7,33%	0%	0%	59,69%	0%	0%									0%		
B. TAXONOMY NON-ELIGIBLE ACTIVITIES																				
OpEx of Taxonomy non-eligible activities		0,900	32,98%																	
Total (A + B)		2,728	100%																	



Nuclear and Fossil Gas Related Activities

The following table provides Taxonomy reporting for activities related to nuclear energy and fossil gas. These activities are presented separately from those in the previous tables, due to the ongoing debate about their classification as environmentally sustainable. The assessment of eligibility and alignment for nuclear and fossil gas-related activities follows a unique approach compared to other activities. Specifically, only six designated activities that support the transition to climate neutrality are eligible for alignment under the EU Taxonomy. The table below confirms that the Company does not engage in activities related to nuclear and fossil gas. Thus, the following tables on these activities have not been included.

TEMPLATE 1: NUCLEAR AND FOSSIL GAS-RELATED ACTIVITIES

Row	Nuclear energy related activities	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO

	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
3	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO



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E3 WATER & MARINE RESOURCES

Impact, Risk and Opportunity Management

E3-1 Policies Related to Water and Marine Resources

ThPA S.A. has not established a formal policy specifically for water or marine resources, nor a separate policy focusing on sustainable oceans and seas. However, its commitment to responsible environmental management is incorporated into existing policies, such as the Environmental Policy and Sustainability Policy, which, together with an Environmental Management System (EMS) certified to ISO 14001:2015 standards, address key aspects of sustainable water management and the prevention of environmental degradation. The absence of a specific policy on these issues is mainly since the Company's existing frameworks (e.g. Environmental Policy, Sustainability Policy) already incorporate relevant principles and commitments, thus ensuring integrated environmental management without the need for a stand-alone policy. Although the Company has not yet adopted specific policies or practices related to sustainable oceans and seas, it continuously improves its Environmental Management System by using Management Reviews, Internal Audits, Identification and evaluation of the environmental aspects of its activities and their impact and corrective actions.

However, efficient management of Water Resources and Ecosystem Protection is a Strategic Pillar of ThPA S.A.'s Sustainability Policy, which was established in 2023. Regarding seawater, ThPA S.A. is committed to protecting the marine ecosystem and biodiversity and monitoring sea water resources ensuring positive environmental impact and contributing to the marine natural resources' preservation. ThPA S.A. monitors sea water quality in collaboration with external specialized contractors.

Regarding water, the Company implements various measures to monitor, control and ultimately reduce water consumption, both in office buildings, warehouses, dockworker restrooms and showers and for vessel supply. The Environmental Management System which adheres to ISO 14001:2015, ensures that the aforementioned resources are treated with care. All the above ensures that water is used in a sensible manner, thus ensuring that the principles of sustainable water use are preserved.

The Environmental Policy which is aligned with the requirements of ISO 14001:2015, focuses on preventing marine pollution and improving environmental performance of the Environmental Management System (which also adheres to ISO 14001). It complies with the applicable Environmental Legislation, sets clear environmental goals and programs to reduce the negative and increase the posi-

tive effects of its activities, reviews environmental targets, identifies, evaluates and controls all environmental aspects and impacts and raises awareness among staff and the port community.

ThPA S.A. does not operate in a water risk/high water stress area and there are no water extractions by the Company in all port facilities. More specifically, according to the latest data from the most recent River Basin Management Plan Of The River Basins Of Central Macedonia River Basin District, the ecological potential, ecological status, and chemical status of the Gulf of Thessaloniki are classified as "good." This indicates that the projects implemented by various stakeholders for the environmental protection, along with ongoing monitoring efforts, are yielding positive results. Furthermore, as neither this specific plan nor the broader regional and national spatial and environmental plans identify significant water stress or water scarcity issues in the area, they are not considered a priority concern for ThPA S.A. Thus, it important to note that no relevant policies are deemed necessary to having been adopted for the Company.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.

E3-2 Actions and Resources Related to Water and Marine Resources

ThPA S.A. recognizes the importance of water as a shared resource vital for all living organisms that must be preserved for future generations. All water used in the Company's facilities concerns freshwater supplied by the Thessaloniki Water Supply and Sewerage Company (EYATH). Water consumption includes its office buildings, warehouses and dockworker restrooms and showers. Water is also consumed for cleaning and maintenance of the Port's road network and for vessel supply. Any wastewater and sewage produced is delivered to the Municipal Wastewater treatment facility in Sindos, through the pipeline network of EYATH.

The Company has established a number of procedures and control measures to ensure no direct wastewater is discharged into the marine environment, as it understands that the protection of the ecosystem is essential and it is committed to taking the right steps. With the assistance of certified contractors, ThPA S.A. carries out a seawater monitoring program to ensure compliance with the approved environmental terms for the operation of the Port. It's important for the Company to safeguard a sustainable growth while preserving the marine and terrestrial ecosystems, so ThPA S.A. carries out Environmental Impact Assessments prior to the implementation of any investment related to the expansion of the Port.

ThPA S.A. has also identified emergency scenarios in reference to marine pollution from hazardous chemical substances and petroleum products and has prepared response plans for each one of them. The emergency response plans are reviewed annually by the Company and approved by the Harbor Master which is the competent authority. The execution of any emergency response actions is delegated to an external authorized company. In cooperation with the competent authorities, the Company conducts regular marine pollution incident response drills, as well as continuous training of the responsible staff. Last, it is worth noting that there are no significant spills at ThPA S.A.'s port land-based facilities. In addition to this, ThPA S.A. continues its initiatives for the protection of the marine environment. In September 2024, an underwater sea cleaning action was conducted for the first time at the Thessaloniki waterfront, in cooperation with the Mediterranean Company for Environmental Protection (MEPP).

As specified in E3-1 section, ThPA S.A. does not operate in areas at water risk, or high-water stress areas, thus it does not implement any related actions or resources related to these.

The Company's initiatives, monitoring activities, and all related actions concerning water and marine resources are ongoing and do not have a defined completion timeframe. The majority of these actions are recurring annually, ensuring continuous management and assessment of water and marine-related impacts.

Metrics and Targets

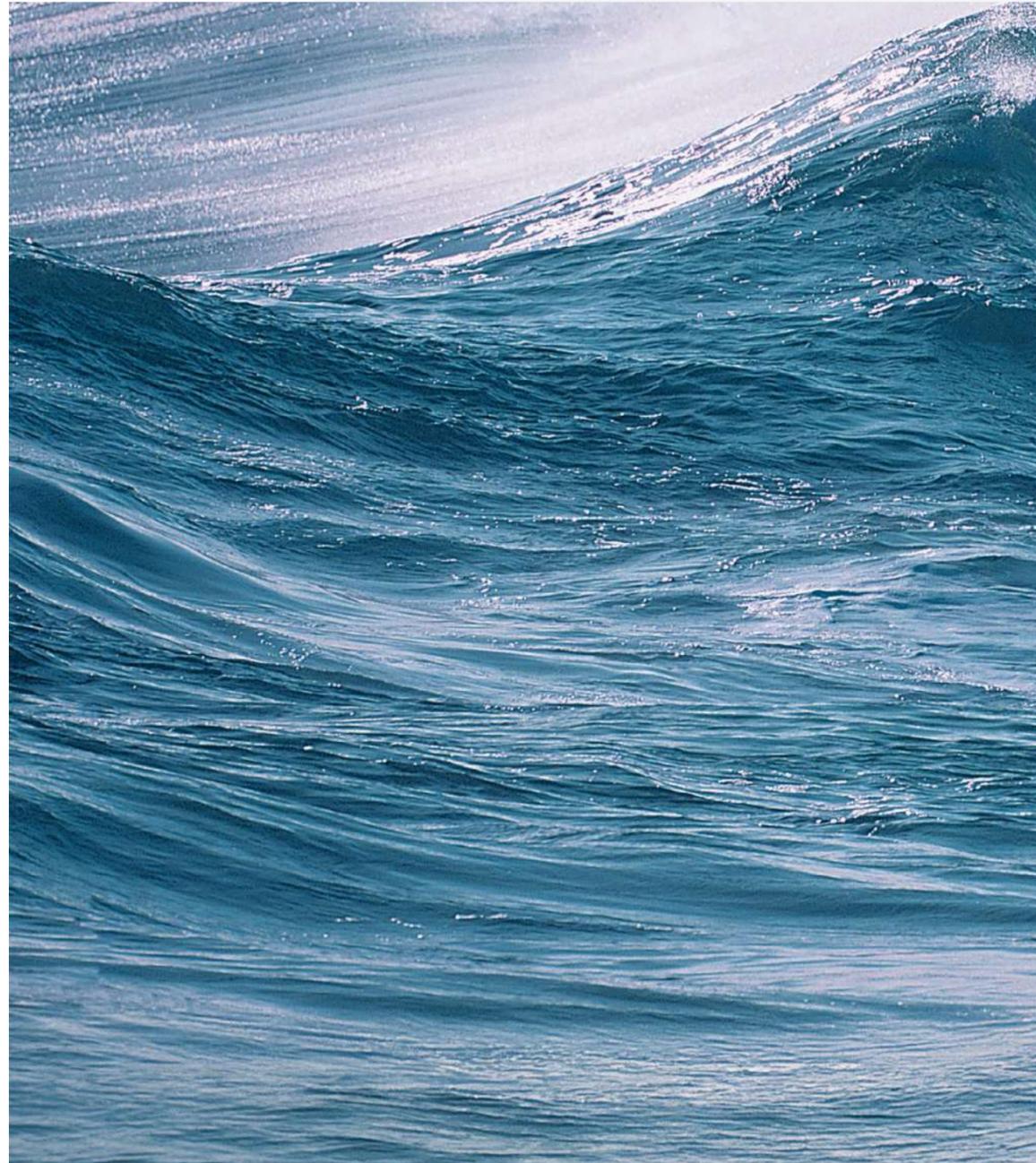
E3-3 Targets Related to Water and Marine Resources

ThPA S.A. has not yet set measurable targets with a defined timeframe based on results for impacts, risks and opportunities related to water and marine resources. However, the Company intends to set such targets in the near future and is working towards this goal. The timing for setting these targets is expected to be determined within the next months, with the delay being primarily due to the need for further analysis and evaluation of data and sustainability strategies related to water and marine resources. Despite the lack of measurable targets, the Company regularly monitors the effectiveness of its policies and actions through systematic processes, such as monitoring seawater quality and assessing the impact of port operations on the local marine ecosystem when conducting an Environmental Impact Assessment. Indicators for assessing progress include both qualitative and quantitative measures, such as the frequency of reporting on seawater quality.

E3-4 Water Consumption

ThPA S.A.'s measurement of the metrics has not been validated by any external body other than the assurance provider and are presented below.

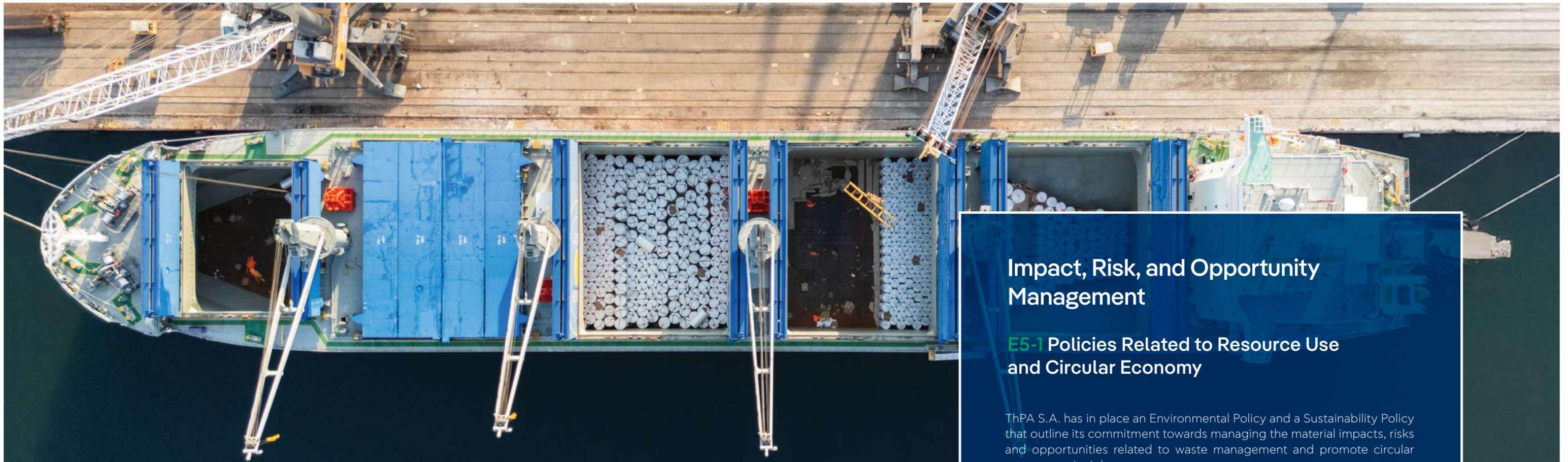
In addition to this, all metrics were obtained through direct measurement, without the use of sampling, extrapolation, or best estimates.



Water and Marine Resources	Unit	2024
Water		
Total water consumption	m ³	319,829.17*
Water consumption from areas with water risk	m ³	N/A
Water recycled and reused	m ³	N/A
Water stored	m ³	N/A
Changes in water storage	m ³	N/A
Share of the measure obtained from direct measurement, from sampling and extrapolation, or from best estimates	m ³ /million euros	100% direct measurement
Water intensity ratio	m ³	3,181.75
Water withdrawal in areas with water risk	m ³	N/A
Total water withdrawal in areas with water risk	m ³	N/A
Water discharges in areas with water risk	m ³	N/A
Total water discharge	m ³	NA**

* The total water consumption was calculated by subtracting from the total annual water consumption billed by the water provider Company (EYATH), the water sales to vessels and tenants.

** In ThPA S.A. the only occurring water discharge from its facilities is stormwater runoff but its quantity is not systematically monitored. Thus, the metric is not available.



Impact, Risk, and Opportunity Management

E5-1 Policies Related to Resource Use and Circular Economy

ThPA S.A. has in place an Environmental Policy and a Sustainability Policy that outline its commitment towards managing the material impacts, risks and opportunities related to waste management and promote circular economy principles.

The Sustainability Policy commits to efficient waste management through monitoring and control of operational waste, the promotion of recycling and proper treatment and disposal. ThPA S.A. has a Waste Management Plan in compliance with laws and regulations and employs tools such as Digital Waste Registry for waste tracking purposes, recycling optimization, and conformance assurance. This policy has given special emphasis to waste management due to its environmental impact.

The Environmental Policy is in alignment with ISO 14001:2015 specifications and aims at waste prevention and continuous improvement of environmental performance. It sets clear environmental goals, informs and raises awareness of the port community, suppliers, contractors and passengers passing through the port, on environmental management issues.

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E5 RESOURCE AND CIRCULAR ECONOMY

Also, ThPA S.A. engages suppliers and contractors in environmentally responsible activities. Through its Procurement Regulation, ThPA S.A. ensures that all contractors comply with all existing obligations in the areas of environmental, safety, social and labor law enacted by EU law, national law, collective agreements or international provisions of environmental, social, labor law and tax law (where applicable). This requirement is indicated in the tender documents and constitutes a special condition for the performance of the contract. The breach thereof by the contractor may constitute grave professional misconduct of the prospective supplier that will allow its exclusion from a subsequent procurement procedure.



The policies apply across ThPA S.A.'s operations, targeting all waste generated within the port. They also cover the upstream and downstream activities, from collection, storage, treatment and recycling, in collaboration with licensed contractors.

The top management at ThPA S.A. are responsible for their implementation, while the periodic reviews and audits ensure their continuous improvement. Both policies conform to the principles of ISO 14001:2015 and established national and EU environmental laws. The Company engages in dialogue with stakeholders, including staff, subcontractors and customers, regarding environmental sustainability and ensures policies meet their expectations.

Both policies are available on ThPA S.A.'s website ensuring transparency and are accessible for all stakeholders. Such a framework allows ThPA S.A. to manage its material issues arising under circular economy and fully align with its sustainability strategy commitment to a low-carbon, resource-efficient future.

ThPA S.A.'s current policies do not specifically address transitioning away from the use of virgin resources or the increased use of secondary (recycled) resources. Similarly, there are no dedicated policies in place for the sustainable sourcing and use of renewable resources.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.

E5-2 Actions and Resources Related to Resource Use and Circular Economy

ThPA S.A. takes a proactive approach to waste management as part of its broader environmental management system, with ongoing efforts to minimize waste directed to disposal and maximize recycling. The Company applies a Port Waste Management Plan that outlines procedures for categorizing and handling waste according to the European Waste Catalogue (EWC). The Port Waste Management plan is updated and approved by the Company's top management every three years. ThPA S.A. categorizes waste as hazardous or non-hazardous and as Port-generated or Ship-generated. Licensed partners manage all Port-generated waste, with detailed tracking through a Digital Waste Registry that records their waste statements, waste types, quantities and disposal methods to ensure transparency and efficiency. For Ship-generated waste, ships delivering waste to ThPA S.A.'s facilities follow a Ministry-approved Ship Waste Management Plan. The timeframe of the Ship Waste management Plan is defined by the respective approval decisions of the Ministry of Maritime Affairs and Insular Policy. Two licensed contractors, selected via open tenders under EU Regulation 352/2017, handle this waste. ThPA S.A. has maintained a comprehensive plan for managing ship waste and cargo residues since 2002, which aligns with all relevant and applicable national and European regulations.

It is worth mentioning that employee training programs ensure key staff members understand and can implement Waste Management procedures, emphasizing proper waste separation and fostering a culture of waste reduction, resource conservation and recycling. Across port facilities waste collection points are installed to further support separation and align with circular economy principles. When collected, hazardous waste is handled with care by licensed partners to ensure compliance and minimize environmental risks while solid non-hazardous waste is directed to appropriate facilities (also by licensed partners) to be stored, treated, disposed in landfills or recycled. Lastly, in 2024, large-scale machinery and crane scrapping (equipment decommissioning) took place with the aim of renewing to more efficient equipment.



The Company's initiatives, monitoring activities and all related actions concerning circular economy are ongoing and do not have a defined completion timeframe. The majority of these actions are recurring annually, ensuring continuous management and assessment of resource use and waste management based on the principles of circular economy.

ThPA S.A.'s actions related to the circular economy are reassessed every three years (in the context of the Port's Waste Management Plan reassessment) to determine whether additional measures are needed. So far, this evaluation has not identified such a need, and therefore, no new actions have been planned for the near future.

The actions implemented by ThPA S.A. do not require significant operational or capital expenditures. As a result, they are not classified as significant in terms of monetary amounts.

Metrics and Targets

E5-3 Targets Related to Resource Use and Circular Economy

Although ThPA S.A. has not established specific measurable outcome-oriented targets, it actively monitors the effectiveness of its policies and actions related to resource use and the circular economy. This monitoring is conducted through well-defined processes (e.g. Port’s Waste Management Plan, Environmental Monitoring Mechanism) embedded in the Company’s Environmental Management System (EMS), certified under ISO 14001:2015. The effectiveness of waste management policies and actions is tracked using a Digital Waste Registry. This tool records key data such as waste type, quantity, and disposal methods, enabling ThPA S.A. to evaluate its performance and identify opportunities for improvement. Additionally, the Port Generated Waste Management Plan outlines procedures for waste categorization and handling, ensuring proper management through licensed partners. Additionally, specialized training programs for employees, combined with internal reviews, ensure alignment with the Company’s waste management and circular economy objectives.

While no specific targets are set, the Company defines its level of ambition as a commitment to reducing landfill waste, maximizing recycling and improving waste management practices in alignment with regulatory standards and stakeholder expectations. Progress will be measured against data from the base year 2024 and evaluated through quantitative indicators such as the percentage of non-recycled waste or the amount of waste generated.

The absence of measurable outcome-oriented targets is mainly due to the ongoing development of ThPA S.A.’s sustainability strategy and the need to further assess its feasibility and methodology for setting such targets. Additionally, the Company prioritizes aligning its sustainability objectives with evolving regulatory requirements, stakeholder expectations and internal processes before formally adopting specific outcome-oriented targets.

E5-5 Resource Outflows

Total Waste Catalogue

At ThPA S.A., port generated waste is divided in two main categories: hazardous and non-hazardous. Port-generated waste is the result of the port’s daily operations. Regarding ship-generated waste, ThPA S.A. does not own or control the waste generated by calling vessels but manages through dedicated contractors.

Among the waste streams relevant to ThPA S.A.’s operations, port-generated waste is mainly composed of materials produced during normal port activities such as construction debris, packaging waste and general operational waste.

The materials that are present in ThPA S.A.’s waste (hazardous and non-hazardous), include mixed municipal waste, metals, plastics, paper and packaging material, iron, steel, glass, filter materials, textiles, waste oils etc. all of which are carefully managed according to regulations. Licensed contractors are used by the Company in order to ensure proper waste management either through disposal, treatment or recycling.

Disclosure Requirement E5-5 – Resource outflows			
	Unit	2024	
Total waste generated	tn	5,134.116	
Non-recycled waste	tn	582.980	
Percentage of non-recycled waste	%	11.36	
Total amount of hazardous waste	tn	61.014	
Waste Diverted from Disposal			
Types of Recovery	Unit	2024	
		Hazardous Waste	Non-hazardous Waste
Preparation for reuse	tn	0	0
Recycling	tn	61.014	4,490.122
<Other recovery operations>	tn	0	0
Total waste diverted from disposal	tn	61.014	4,490.122
Waste Directed to Disposal			
Types of Treatment	Unit	2024	
		Hazardous Waste	Non-hazardous Waste
Incineration	tn	0	0
Landfill	tn	0	582.980
<Other disposal operations>	tn	0	0
Total waste directed to disposal	tn	0	582.980

Please note, that due to the nature of its operations, ThPA S.A. does not produce any amount of radioactive waste. Metrics are validated in the context of ISO 14001:2015 certification as well as the Electronic Waste Registry (EWR).

Methodologies Used to Calculate Waste Data

The Company’s data on waste management is based on direct measurements. For each waste stream, the designated contractor collects the waste, weighs it and categorizes it on-site. No estimations or additional assumptions are used in this process.



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SI OWN WORKFORCE

Strategy

SBM-2 Interests and Views of Stakeholders

ThPA S.A. recognizes the importance of engaging with its employees to align the sustainability strategy with their interests and views, as it also acts in accordance with the human rights framework established by international organisations and the United Nations. Through regular, two-way communication channels such as employee Pulse Surveys, feedback forums, continuous communication with Employee Unions and structured reporting and dialogue sessions, ThPA S.A. actively seeks to understand and address the priorities of its employees, as they are essential in realizing its transformative vision. By conducting employee Pulse Surveys, we gain valuable insights into our Company's strengths and identify opportunities for improvement. Additionally, employees maintain direct communication with their supervisors, who promptly relay any critical information or concerns to the HR Department when necessary. The Company has also established whistleblowing channels that allow employees to express their concerns and/or violations anonymously or named.

SBM-3 Material Impacts, Risks and Opportunities and their Interaction with Strategy and Business Model

Types of Own Workforce

All people in the Company's workforce who can be materially impacted are included in the scope of disclosure under ESRS 2. Specifically, ThPA S.A. employs a diverse workforce that includes both employees and non-employees, depending on the nature of their collaboration with the Company. Specifically, the workforce of ThPA S.A. consists of employees both at blue- and white-collar work positions and non-employees, that are provided by third-party companies. Blue collar employees constitute the biggest constituent of its workforce, wherein port machinery operators, dock workers and technical staff have the daily responsibility for operation and maintenance of the port facility. The white-collar employees coordinate the whole operations of the Company and further work in its various departments comprising of sales, management, accounting and marketing.

As far as personnel in the value chain are concerned, both directly employed by ThPA S.A. and those employed within the Company's facilities not forming part of the above-mentioned personnel (non-employees), are directly or indirectly affected by the activities of the Company. Non-employees exist within the facilities, such as cleaning crews, suppliers, maintenance technicians, Security staff, etc., all helping to accomplish the running of the services and operations. Although they are not part of the Company's staff, their contribution is important for the completion of projects that serve the operational needs of ThPA S.A.

ThPA S.A.'s own workforce is covered under a collective labour agreement, which ensures access to all established policies, benefits and programs. For other categories of non-employees such as contractors, or any other non-standard employment category, who are not covered by this agreement, their benefits, training opportunities (if applicable) and participation in relevant programs are formalized within their specific service agreements with ThPA S.A. While these non-employees do not fall under the collective labor agreement, their working conditions, Health and Safety provisions and any additional entitlements are outlined in their respective contracts, ensuring clarity and compliance with applicable labor regulations.

The Company acknowledges that it has not yet developed a formal transition plan or a clear decarbonization strategy, and as a result, it is currently unable to estimate the specific negative environmental impacts or to forecast the achievement of climate-neutral operations. Consequently, none of the ThPA S.A.'s material impacts on employees arise from transition plans concerning the reduction of negative impacts on the environment or achievement of greener and climate-neutral operations.





IROs to Own Workforce

The results of the DMA identified three material negative impacts which refers to the limited female representation in ThPA S.A.'s blue-collar roles, the absence of a performance evaluation process and the working conditions, that expose mostly blue-collar employees to significant physical risks. The negative impacts are not widespread/systemic or related to individual incidents but are inherently linked to the nature of the Company's operations as a port authority and its involvement in port infrastructure activities. These impacts primarily stem from industry-specific challenges, such as employee exposure to heavy machinery and operational hazards. Additionally, the underrepresentation of women in blue-collar roles reflects broader industry trends rather than company-specific policies. Furthermore, the absence of a formalized performance evaluation process for all employees is recognized as an area for improvement but does not constitute a figurative issue affecting workforce management.

ThPA S.A. identifies Health and Safety as one of the material risks for one's own workforce, including all employees and non-employees. Due to the presence of heavy machinery and the high volume of port traffic, these risks are managed through a well-established Health and Safety Management System (ISO 45001: 2018). Moreover, the Company acknowledges that identifying how specific characteristics, work environments, or activities may elevate the risk of harm—particularly for blue-collar employees—is essential for developing effective Health and Safety measures.

The Company gathers input directly from employees, through its Pulse surveys and feedback mechanisms to better understand their concerns, experiences and perceptions of risk. Additionally, it considers other data sources, such as health and safety records, to identify trends that may indicate heightened risks for specific workforce groups. However, this remains primarily an internal process for ThPA S.A. to demonstrate a clear understanding of the heightened risks faced by certain employees based on their characteristics, work contexts, or activities.

Until December 2024, in ThPA S.A.'s operations, a total of six work-related accidents were recorded, with no fatal incidents and zero fatalities resulting from work-related injuries or ill health among its employees. Likewise, no fatalities were reported among other workers operating on the Company's sites. No cases of recordable work-related ill health occurred and a total of 30 lost workdays were recorded due to work-related injuries and fatalities from accidents or ill health. Risks related to labor are proactively addressed and mitigated through the implementation of Health and Safety, Human Rights, Violence and Harassment Policies and procedures relevant to business conduct. These measures are designed to prevent material negative impacts, whether systemic or (mostly) related to individual incidents and ensure the responsible and ethical management of labor practices across all operational contexts.

Through the DMA, ThPA S.A. identified positive impacts only for its own employees and non-employees and no impact was identified related to the Company's value chain. Positive impacts mainly highlight the Company's commitment to the creation of an inclusive work environment, promoting social inclusion and reducing inequalities, support employees' well-being and work-life balance, fostering a culture of respect, safeguarding human rights and transparency in its operations, ensure the right to free association for employees and implement policies for inclusivity and equal opportunities for all. ThPA S.A. also contributes to data protection by safeguarding sensitive information and mitigating risks related to data breaches, while maintaining compliance with both privacy regulations and international security standards.



The Company's actions focus on enhancing employee well-being and Health and Safety, working conditions, and work-life balance through various activities. These include initiatives for providing fair wages and benefits, preventing excessive overtime, ensuring safer working conditions, fostering a culture of respect by preventing and addressing workplace violence and harassment, enhancing accessibility and reducing inequalities in the workplace. Career growth is supported by structured hiring processes and fair selection practices.

With regards to opportunities, arising from related impacts, initiatives that enhancing inclusiveness, promote work-life balance and creating a respectful workplace initiative, adhering to ethical standards, complying with GDPR standards and implementing robust Health & Safety measures have been identified as main opportunities since they may increase the reputation as a responsible employer, improve the retention of existing employees, attract future employees and increase employees' performance.

ThPA S.A. operates exclusively within the EU and not in any region outside, a region with robust legal frameworks and strict enforcement mechanisms to protect against forced or compulsory labour and child labour. Given this regulatory context, all operations of the Company, including its own workforce, are governed by stringent EU and national labour laws that prohibit such practices. These laws, coupled with compliance requirements across industries, significantly mitigate the risk of incidents of forced labour, compulsory labour, or child labour within the Company's operations or associated activities. However, ThPA S.A. continuously monitors its suppliers and business relationships to ensure the protection of its own workforce, ensuring alignment with the principles outlined in international human rights conventions, EU labour regulations and international labour standards.

Impact, Risk, and Opportunity Management

SI-1 Policies related to own workforce

Policies

ThPA S.A.'s policies do not explicitly state alignment with internationally recognized instruments, such as the UN Guiding Principles on Business and Human Rights. However, they fully adhere to the applicable National and European legislative framework, ensuring compliance with relevant regulations and standards. Moreover, as stated previously, ThPA S.A. operates exclusively within EU where stringent legislative frameworks and employment laws provide protections against trafficking, child labour, forced labour and compulsory labour. Given this comprehensive legal safeguard, the Company has not deemed it necessary to implement a separate business policy specifically addressing these issues.

Code of Ethics

Since its incorporation, ThPA S.A. has emphasized integrity and transparency in all its business activities. The Code of Ethics outlines the fundamental principles, rules and values guiding the Company's operations, ensuring responsible and ethical conduct in all interactions with employees, customers, suppliers, and partners.

- **Integrity:** We uphold local and international laws and commit to operating with integrity, transparency, and responsibility towards the community.
- **Technological Leadership & Innovation:** We invest in cutting-edge technologies and foster continuous learning to provide high-quality, innovative solutions.
- **Team Spirit:** Collaboration and teamwork are essential to our success. We value the input of all employees, leveraging their skills and ideas to achieve common goals.
- **Merit-based Approach:** We emphasize fairness, transparency and merit in all decisions related to hiring, promotions and business transactions.
- **Compliance:** We comply with all relevant laws and regulations, ensuring that ethical standards are always upheld.
- **Non-Discrimination & Harassment:** We are committed to providing an inclusive and respectful workplace, free from discrimination and harassment of any kind.
- **Reporting Violations:** Employees can report violations of the Code and such reports will be handled confidentially and without retaliation.

This Code ensures ThPA S.A. operates ethically and responsibly, contributing to our long-term sustainability and the well-being of our community.

Whistleblowing Procedure

ThPA S.A. is committed to maintaining the highest level of ethical and professional conduct, adopting a zero-tolerance policy to illegal actions that may negatively affect its reputation and credibility. This service provides the possibility to report anonymously on irregularities, omissions or offences brought to the attention of employees, customers, suppliers or any other interested party. It is a prerequisite that such information is given in good faith, i.e. that there are valid reasons to believe that the information reported is true. ThPA S.A. is committed to maintain the highest level of ethical and professional conduct, adopting a zero-tolerance policy to illegal actions that may negatively affect its reputation and credibility.

Someone may remain anonymous if he/she wishes, but in case one wants to be informed about the action be taken by the Company, one could indicate the full name and contact details. In this case, the identity will not be disclosed to anyone other than authorized members of staff. It may, however, be disclosed during judicial or other legal proceedings, in order to safeguard the defense rights of the person concerned. The Company ensures that the person reporting information in good faith is appropriately protected from retaliation.



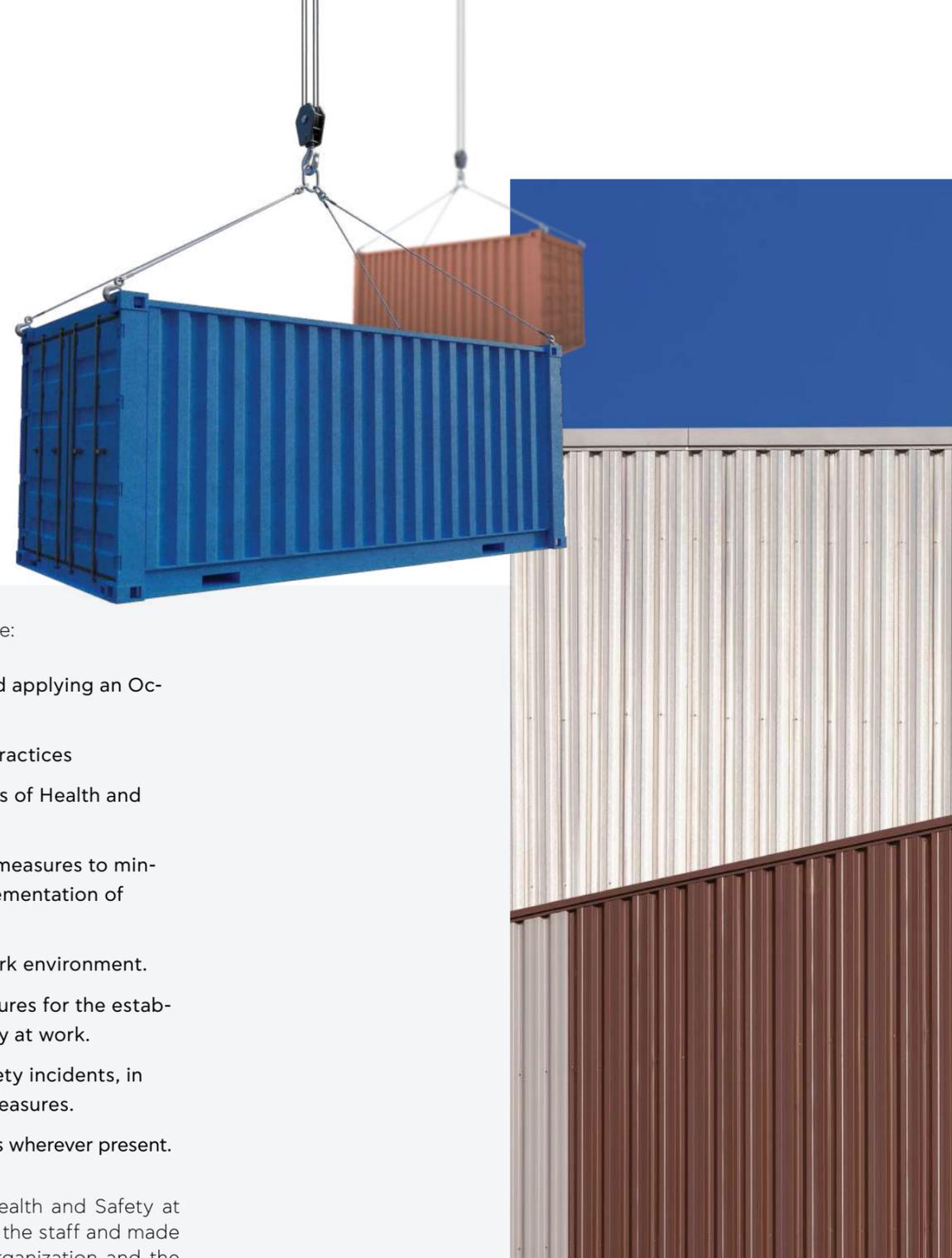
Health & Safety Policy

The defense of Health and Safety at work, as well as the creation and maintenance of a healthy and safe working environment, are the main priorities of ThPA S.A. It is a commitment of the Management to provide safe and healthy working conditions for the prevention of accidents at work and occupational diseases as well as the continuous improvement of the efficiency of the Management System for Health and Safety at work.

Key pillars of the Policy of ThPA S.A. in the field of Health and Safety at work are:

- Compliance with the requirements of the ISO 45001: 2018 standard and applying an Occupational health and safety management system.
- Compliance with applicable legislation, International Codes and Best Practices
- Continuous information, training, awareness of all employees in matters of Health and Safety at work.
- The systematic recognition of occupational hazards and the taking of measures to minimize the risks to Health and Safety in the workplace as well as the implementation of recognized good practices from the global experience.
- Taking measures in order to take advantage of opportunities in the work environment.
- The provision of all necessary means (equipment, training) and procedures for the establishment, review and achievement of the objectives for Health and Safety at work.
- The transparent, timely and thorough reporting of all occupational safety incidents, in order to identify the causes and implement preventive and corrective measures.
- The consultation and participation of employees and their representatives wherever present.

The Management assumes general responsibility for the protection of the Health and Safety at work and therefore ensures that this Policy is kept informed, communicated to the staff and made available to the public and stakeholders. The systematic inspection of the organization and the procedures contributes to the achievement of the goal of absolute observance of the rules of safe work in every field of work.



Diversity Policy

The Company's objective is to treat all employees honestly and fairly, and to promote their advancement and growth. Ensuring the diversity of the Company's human resources and providing equal opportunities to all ThPA S.A. employees can yield benefits at every level, provided the necessary preconditions have been established that promote diversity and the equal treatment of executives in this environment.

The Board of Directors must present gender diversity, as well as diversity in skills, opinions, abilities, knowledge, qualifications and experience that correspond to the Company's objectives. Diversity is aimed at the accomplishment of corporate goals, given that it strengthens the pool of skills, experience and knowledge available to the Company at its most senior management levels, and its competitiveness. The diversity policy, including gender equality for Board members, as this has been adopted by the Board of Directors, is posted on the Company website. The choice of practices and the corresponding policy is founded on the Company's needs and on any omissions which may be identified in the existing policies that are implemented. Additionally, the Board of Directors is responsible for educating senior Management Executives so that they may be informed about how to deter cases of discrimination and how to promote diversity and equal treatment among executives.

Pursuant to this Policy, diversity in the workplace does not permit the exclusion of any executive from any operation, position and work team. The policy of ThPA S.A. is to operate under fair and legal procedures of human resources management, and not to discriminate on the basis of age, race, gender, color, ethnic origin, religious beliefs, health status, sexual preferences, political or ideological views, or other employee characteristics that are protected by laws and regulations. Employees are required to comply with all laws and regulations and to perform their work in light of the above non-discrimination principle.

Policy for the Prevention and Handling of Conflicts of Interest

This policy establishes the concept of conflict of interest, the persons liable to comply with the policy, as well as those special cases where it is possible for a conflict of interest to ensue. The purpose of this document is to institute substantial rules which delimit the conflicts of interest within the corporate organization, in order for the competent administrative, managerial and supervisory bodies to be able to:

- a) identify, evaluate, anticipate, manage, deal with or and avert similar states and, subsequently,
- b) to safeguard and promote the corporate interest.

Training Policy of the BoD Members, the Managers and Other Executives

ThPA S.A. implements an introductory training process for the newly elected/newly appointed members of the BoD and the Audit, Nominations and Remuneration Committees, in order to facilitate the understanding of its members regarding the structure of the Company and its subsidiaries, the business model, the risk profile, the governance arrangements and their role in them. In this context, the Company ensures that the newly elected/newly appointed members are provided with all the information and training required to contribute effectively to the works of the BoD and the Committees and to the fulfilment of their mission. Given the evaluation based on the Suitability Policy submitted to the newly elected/newly appointed members, it is expected that they have the necessary knowledge, experience and know-how to fulfil their role. However, they are not necessarily all experts in all matters or aspects of governance. For this reason, training is a key factor for the continuous effectiveness of the BoD and a permanent commitment of the Company's BoD members.

The Company provides the necessary financial and human resources for the implementation of appropriate introductory and training programs on a continuous and personalized basis. In addition, presentations are made on a regular basis to the members of the BoD by the Company executives and external partners, in order to inform them about changes concerning the Company, the legal and regulatory framework, the requirements of the market and the industry.

Anti-Bribery Policy

ThPA S.A. implements a zero-tolerance policy in case of corruption and bribery. The Company's Management, taking into account the benefits of adopting a holistic and systematic approach to the prevention, deterrence and fight against Bribery, decided to install an anti-Bribery Management system, which takes into account the operating framework of the Company, the expectations and limitations deriving therefrom, and the requirements of the International standards ISO 37001:2016.

The purpose of the Policy is to provide a general framework through which an effective System is established and implemented, which:

- Ensures compliance with applicable Greek and Community legislation
- Ensures understanding of the definition of bribery and the forms of bribery ThPA S.A encounters
- Takes into account the results of the bribery risk assessment to select the appropriate strategy
- Encourages confidential reporting of any incident or suspicion of bribery through specific means of communication
- Contributes to the vigilance of employees and associates for the recognition of actions related to bribery and the protection of the reputation of ThPA S.A.
- Remains effective in achieving the goals and meeting the requirements of business continuity, while fully in line with the requirements of the International Standard ISO 37001:2016.

ThPA S.A. recognizes that the implementation of an effective anti-Bribery Management System presupposes continuous awareness and training of staff and clear definition of roles and responsibilities. The Management, recognizing the risks, is committed to allocate all the necessary resources for the implementation and continuous improvement of the System.



Recruitment Policy

ThPA S.A.'s Recruitment Policy, which was revised in 2022, well-defines the exact steps of the recruiting process and refines the actions related to human resource management, planning, attracting, selecting and hiring new employees, as well as the communication channels through which all information is shared externally. All vacancies are advertised online on sector-specific websites, on business and employment-focused social media platforms and the Company's website. Communication with potential candidates occurs through the completion of an online recruitment form on the Company's website, in-person submission, or referrals from ThPA S.A.'s partners (accompanied by consent for the Personal Data Processing) or any other external partner).

Policy Commitments on Human Rights

The Company's commitments are incorporated into its existing policies, such as the Code of Ethics and Diversity Policy, even though they are not explicitly defined as standalone commitments. Despite the absence of a dedicated Human Rights policy, these principles are embedded across various policies, reflecting the Company's commitment to responsible business practices. ThPA S.A.'s policies do not explicitly state alignment with internationally recognized instruments, such as the UN Guiding Principles on Business and Human Rights. However, they fully adhere to the applicable National and European legislative framework, ensuring compliance with relevant regulations and standards.

The following commitments are derived from the Company's existing policies. While they may not be explicitly labeled as "commitments," they are embedded within each policy and form an integral part of ThPA S.A.'s approach to responsible business practices.

Commitment to Equality, Diversity and Inclusion

Equality, diversity and inclusion govern ThPA S.A.'s operations and the Company is dedicated to cultivating them across all dimensions (gender, skills, talent, knowledge, opinions, and qualifications). By doing so, ThPA S.A. fosters an open, honest and fair workplace, which is characterized by mutual trust and respect. The Company's Diversity Policy is fundamental in protecting human rights and keeping its people well-informed about its values and principles. By eliminating discrimination and promoting diversity and inclusion, ThPA S.A. strengthens its reputation and demonstrates its commitment to be an employer of choice. Embracing diversity is not only integral to achieving ThPA S.A.'s vision of being more than a port but also to bring in new, ambitious and skilled employees with different backgrounds, so as to enhance its competitive edge and growth potential. Additionally, ThPA S.A. showcases zero tolerance to any form of discrimination and it strives to provide an open, safe and inclusive working environment, free of discrimination based on personal characteristics such as age, race, gender, color, ethnic background, religion, health status, sexual orientation or any other characteristic protected by the law.



Commitment to Preventing and Combatting Violence and Harassment

ThPA S.A. is committed to maintaining a workplace free of violence, harassment, intimidation and discriminations, and declares its zero tolerance for such behavior, including the behavior of colleagues, superiors, managers, clients, visitors, contractors and associates, and will act vigorously to prevent violence and harassment in the workplace. The employees and all kinds of associates of the company are forbidden to proceed to any threat of violence or violent action, harassment, discrimination and violation of equal opportunities. The Company also provides seminars about diversity, psychological bias and sexual harassment prevention, bringing human rights respect into the organizational culture.

Engagement with People in its Own Workforce

ThPA S.A. maintains open and effective communication with its employees through various channels, including daily interactions, reporting systems, forums, working groups, interviews, intranet, press releases and social media. The Company addresses key employee interests such as occupational health and safety, training and development, equal opportunities, compensation/benefit schemes, diversity and inclusion and human rights protection. By fostering dialogue and conducting surveys, ThPA S.A. ensures employee concerns and expectations are heard assessing whether any feedback can be integrated into its policies and practices.

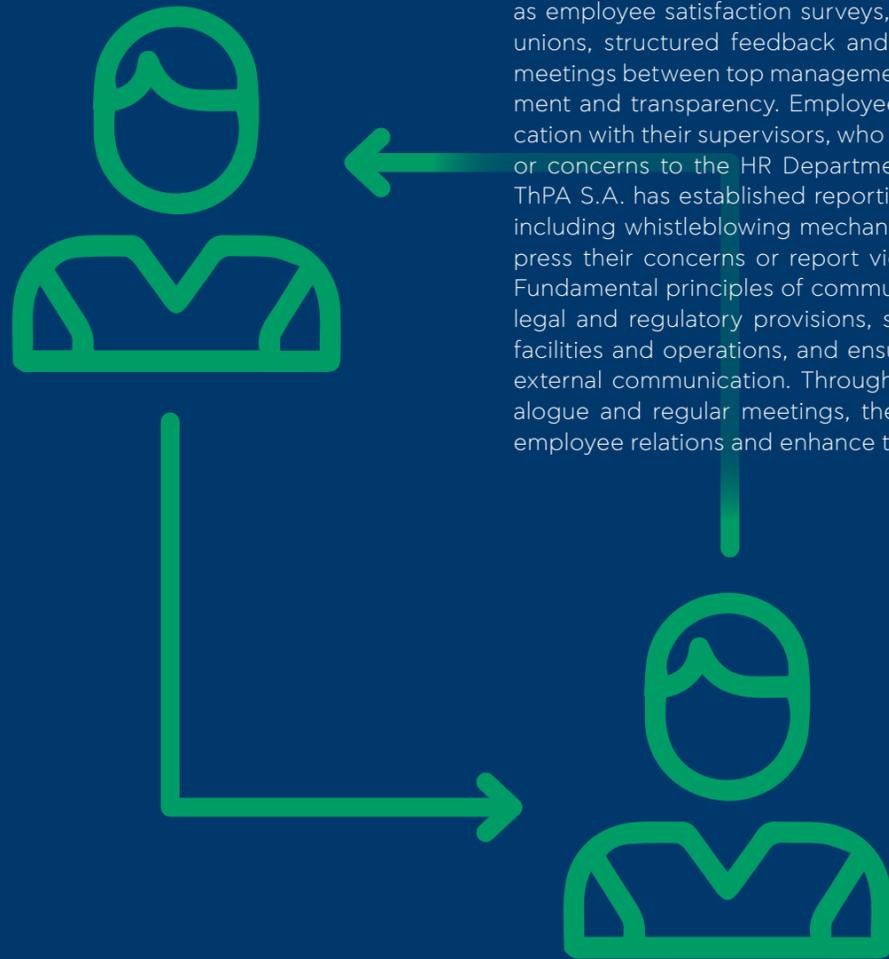
Measures to Provide and/or Enable Remedy for Human Rights Impacts Workforce

The Company has established confidential and accessible grievance mechanisms, including whistleblowing channel and an internal reporting process, to enable employees to raise concerns about potential human rights violations without fear of retaliation. The reporting channel is in place to ensure anonymity and accessibility for all employees. Additionally, ThPA S.A. has implemented formal investigation procedures to assess and address reported concerns in a fair, transparent, and timely manner. Corrective actions may include disciplinary measures, operational adjustments, or potential policy revisions to prevent recurrence. Through these mechanisms, the Company ensures that human rights-related issues are properly identified, investigated, and remediated.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.

SI-2 Processes for Engaging with Own Workers and Workers' Representatives about Impacts

ThPA S.A. recognizes the importance of engaging with its employees as key stakeholders to align its sustainability strategy with their interests and views. This effective engagement with employees is ensured through reliable two-way communication channels such as employee satisfaction surveys, regular meetings with employee unions, structured feedback and dialogue sessions and biweekly meetings between top management and supervisors to foster alignment and transparency. Employees also maintain direct communication with their supervisors, who promptly relay critical information or concerns to the HR Department when necessary. Additionally, ThPA S.A. has established reporting and communication channels, including whistleblowing mechanisms, that allow employees to express their concerns or report violations anonymously or directly. Fundamental principles of communication include compliance with legal and regulatory provisions, safeguarding safety conditions in facilities and operations, and ensuring the integrity of internal and external communication. Through continuous evaluation, open dialogue and regular meetings, the Company strives to strengthen employee relations and enhance the overall workplace experience.



ThPA S.A. employs a multi-faceted approach to understand focus on its workforce, prioritizing occupational safety, diversity, and open communication. By combining the following strategies, the Company aims to create a safe and inclusive environment for all employees:



Health and Safety:

- ThPA S.A. adheres to ISO 45001:2018 standards, emphasizing the systematic recognition of occupational hazards and risk minimization. This involves:
 - Continuous information, training, and awareness programs.
 - Transparent reporting of occupational safety incidents.
 - Consultation and participation of employees and their representatives.
- This focus on risk management is a core component of ThPA S.A.'s effort to ensure safe working conditions for all, and to minimize the risk of any group of employees facing increased exposure to harm due to their job responsibilities becoming vulnerable due to their work.



Equality, Diversity, and Inclusion:

- ThPA S.A. is committed to creating a workplace of mutual trust and respect, where diversity is valued.
- The related policies aim to prevent discrimination based on age, race, gender, religion, or other protected characteristics.
- The policies emphasize on fair and legal human resources management practices.
- ThPA S.A.'s has policies in place to promote diversity in senior management positions.



Stakeholder Engagement:

- ThPA S.A. conducts stakeholder engagement assessments, which include its employees.
- The Company utilizes employee satisfaction surveys to gather insights into the workforce's experience and identify areas for improvement.
- This allows ThPA S.A. to gain insights into its strengths and weaknesses from the employees' perspective.



Sustainability Reporting:

- ThPA S.A. releases sustainability reports that detail its efforts towards social and environmental responsibility, which includes information about its workforce. This provides transparency about their actions.

ThPA S.A. actively assesses the perspectives of its workforce regarding decisions and activities. This direct engagement ensures that all needs and requirements of employees are considered in decision-making processes regarding the impacts. Engagement methods, such as daily communication on health and safety, employee satisfaction surveys, and structured stakeholder assessments, provide valuable insights that directly inform policy and practice. This approach ensures that any issues are promptly recognized and managed, thereby upholding commitment to protecting human rights within its workforce.

The responsibility for ensuring employee engagement lies with the HR Director. This senior role is accountable for overseeing the implementation of engagement strategies and ensuring alignment with the Company's overall objectives. The HR Director makes sure that engagement activities are integrated into the organizational culture and that employees' perspectives are captured and acted upon in the broader context of work-related impacts management. ThPA S.A. monitors the effectiveness of workforce engagement through regular reviews of key protection performance indicators (KPI), related to engagement activities, which are aligned with the Company's objectives. These KPIs have included include metrics mentioned above such as feedback survey completion rates, the quality and relevance of employee contributions, and the extent to which engagement initiatives support overall organizational goals. Furthermore, the Company monitors these programs by tracking issues raised, actions taken, and resolutions achieved, ensuring continuous improvement in workforce engagement.

ThPA S.A. does not have a Global Framework Agreement or any other agreements with workers' representatives specifically regarding respect for human rights within the workforce.



SI-3 Processes to Remediate Negative Impacts and Channels for Own Workers to Raise Concerns

Mitigating the material negative impacts is essential for ThPA S.A. While the Company has not yet established a formal performance evaluation process, it is committed to implementing one in the coming year to enhance transparency and workforce development. Despite the absence of a structured evaluation framework, ThPA S.A. upholds principles of fairness, business ethics, and non-discrimination as outlined in its policies. Recruitment processes are designed to ensure equal opportunities, and established communication channels—such as regular discussions between employees and managers—serve as an avenue for providing feedback and addressing performance-related matters on an ad hoc basis. These informal mechanisms allow employees to raise concerns and seek guidance, fostering an open and supportive work environment. The introduction of a formalized performance evaluation system will further strengthen these efforts by providing a structured approach to assessing and developing employee capabilities.

The limited representation of women in ThPA S.A.'s blue-collar roles poses challenges to fostering a diverse and inclusive workplace. Despite the challenges, the Company maintains a strong commitment to gender equality through policies that prohibit discrimination and ensure pay equity. Its recruitment process is designed to be fair and unbiased, with no gender-based preferences. However, this gender disparity is a broader industry trend, particularly within the port authority and port operations sector, where female candidates for blue-collar positions remain fewer. Recognizing this challenge, ThPA S.A. actively seeks to enhance female representation in these roles by encouraging applications from women and promoting awareness of career opportunities in such operational functions.

The Company's operations involve high-risk working conditions due to heavy machinery and exposure to hazardous materials, increasing the likelihood of accidents and injuries. To mitigate these risks, ThPA S.A. maintains a rigorous health and safety framework, certified under ISO 45001. All incidents are thoroughly recorded, investigated, and reported to the Labour Inspectorate and Port Authority as required, forming the basis for key safety indicators. Through strict safety protocols and continuous employee awareness initiatives, the company fosters a culture of safety and compliance, safeguarding its workforce and contributing to the well-being of the broader community.

To promote open communication at all levels, ThPA S.A. is committed to fostering a culture of open communication where employees feel safe to raise concerns without fear of reprisal. To achieve this, the following channels have been established, and employees are encouraged to use any method they prefer:

- **Dedicated Email:**

A confidential email address is available for employees to report concerns related to ethical violations, safety hazards, or other harmful incidents. These reports are handled by an independent individual, separate from the communication channel, to ensure impartiality.

- **Open Door Policy:**

Managers at all levels maintain an open-door policy, encouraging employees to discuss concerns directly.

- **Anonymous Reporting:**

Employees can submit concerns anonymously through a designated system, ensuring confidentiality.

- **Regular Employee Meetings:**

Regular meetings, including safety meetings, provide opportunities for employees to raise concerns and provide feedback.

- **Investigation and Assessment:**

A thorough investigation is conducted to determine the root cause and extent of any potential negative incident.

- **Monitoring and Evaluation:**

The effectiveness of the remedy is monitored and evaluated through:

- Follow-up surveys with affected employees.
- Regular audits of implemented measures.
- Analysis of relevant data (e.g., incident reports, employee feedback).

ThPA S.A. is dedicated to maintaining a caring, respectful and transparent workplace focused on its employees' interests. In this regard, the Company has introduced a comprehensive Whistleblowing Manual, setting out a clear process for dealing with any instances where its operations may inadvertently cause actual disruption for the workforce. In

such instances, the Company will address concerns in a systematic way through established Whistleblowing channels in order to come to a quick and effective resolution. This policy, therefore, deals with individuals but also promotes the culture of support, respect and an employee's power to raise the concern with boldness.

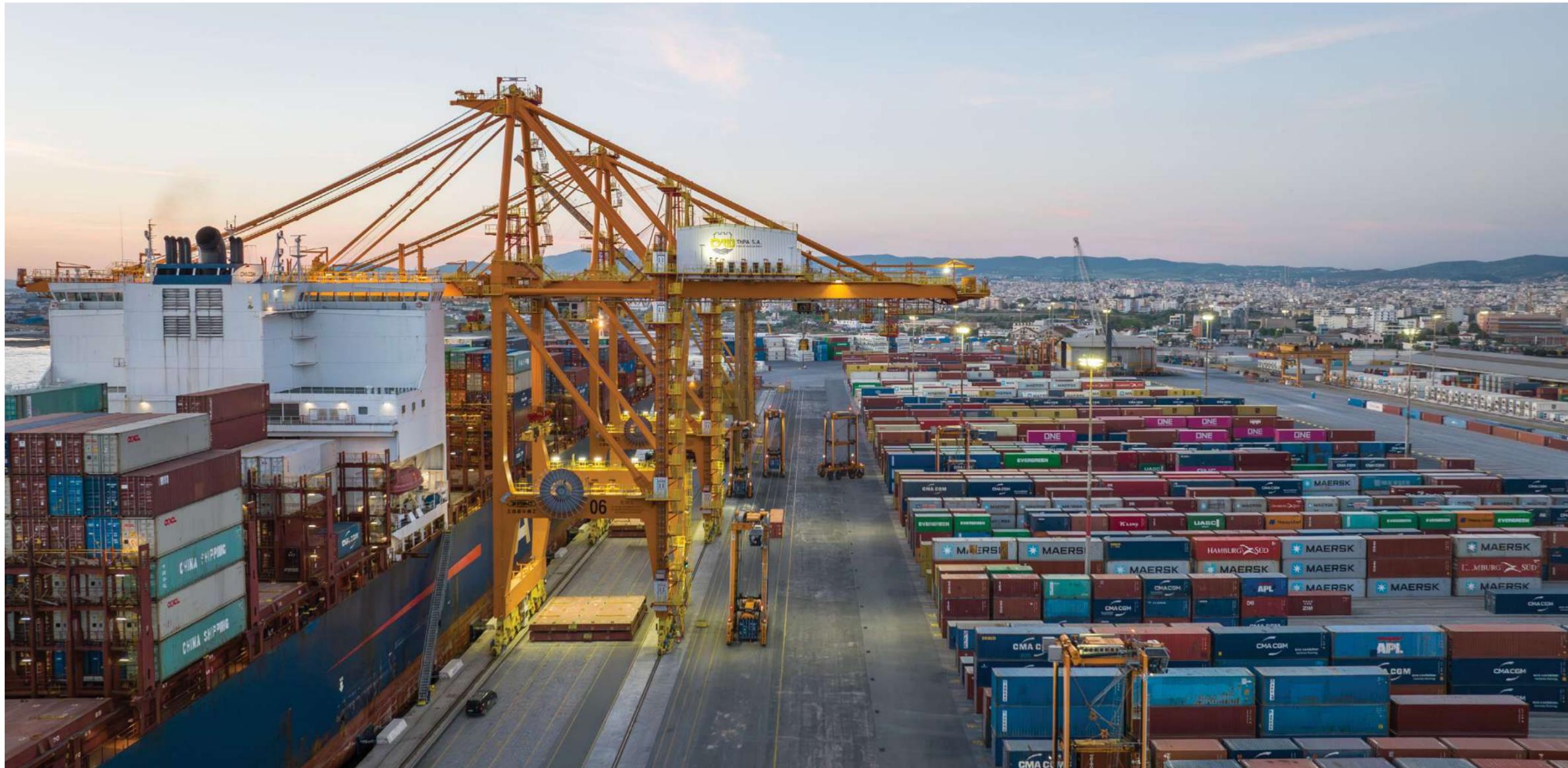
ThPA S.A. is dedicated to continuous improvement in its approach to addressing employee concerns and providing effective remedy. The Company ensures that these processes are clearly communicated to all employees and regularly reviewed for their effectiveness.

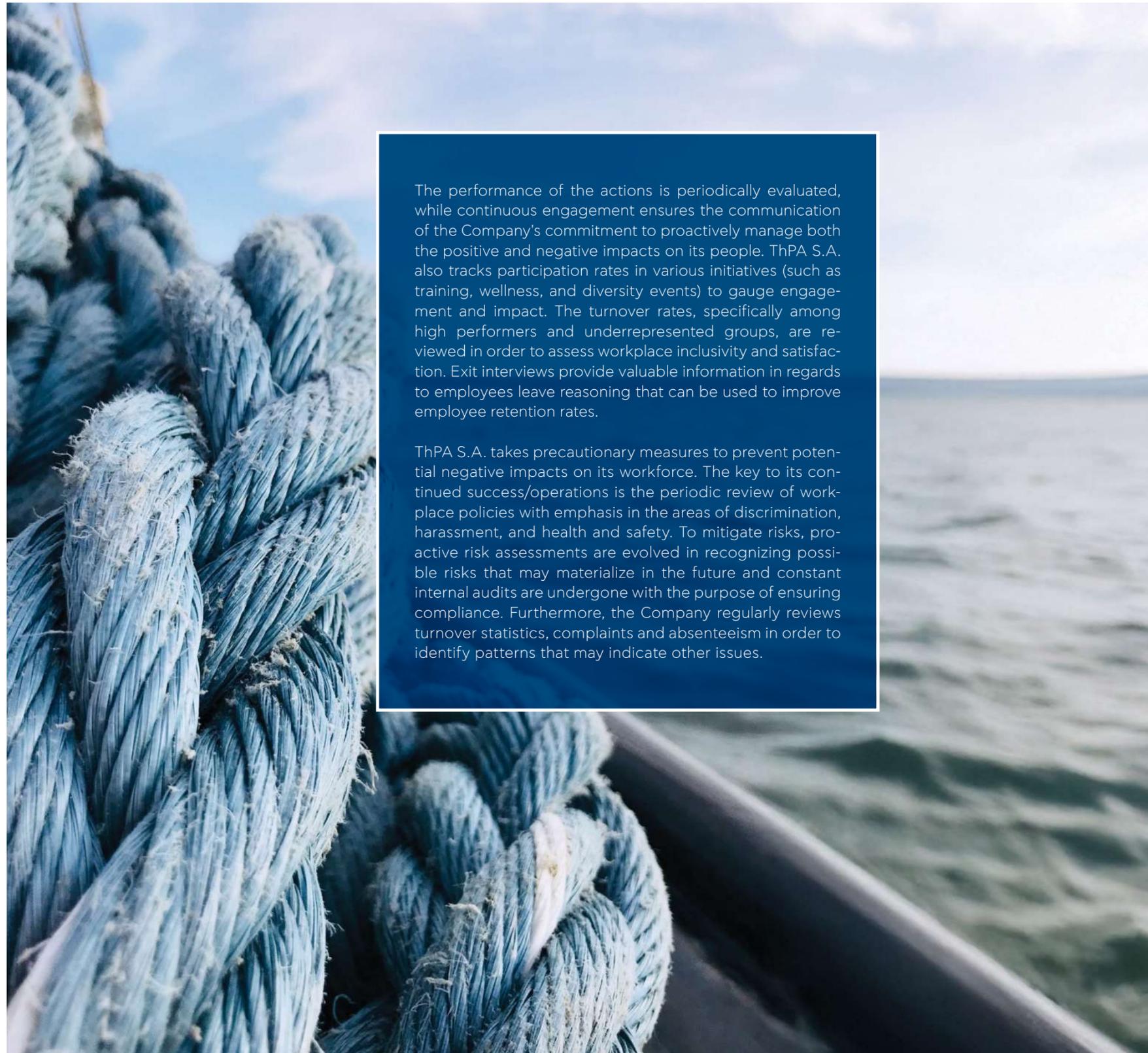
The processes mentioned aim that the grievance and reporting mechanism's, users are protected from retaliation. We maintain a zero-tolerance stand on retaliation, ensuring that any employee who raises any concern or reports an issue will be protected as long as the claims are made in good faith. These policies are communicated to the employees clearly, assuring them that any concerns expressed will be taken up in a confidential manner, with the relevant intervention taken to remedy any instance of retaliation.

SI-4 Actions

ThPA S.A. acknowledges the importance of addressing material impacts, risks and opportunities related to its own workforce as a critical component of its strategy. ThPA S.A. takes proactive actions to prevent or mitigate any material impacts on its workforce, specifically addressing concerns related to the absence of a performance evaluation process, the limited representation of female workers in blue-collar roles and the workers' exposure to significant physical risks due to the Company's operations, through continuous assessments, employee feedback channels and regular monitoring of operations.

Based on the results and outcome thereof, these conclude on appropriate corrective measures, such as process adjustments and/or additional support to affected employees. Current measures include establishing internal control systems, introducing comprehensive risk management frameworks, conducting regular satisfaction surveys to understand and respond to the needs of employees, and a dedicated communication plan with a focus on maintaining an open dialogue between employees and other stakeholders.





The performance of the actions is periodically evaluated, while continuous engagement ensures the communication of the Company's commitment to proactively manage both the positive and negative impacts on its people. ThPA S.A. also tracks participation rates in various initiatives (such as training, wellness, and diversity events) to gauge engagement and impact. The turnover rates, specifically among high performers and underrepresented groups, are reviewed in order to assess workplace inclusivity and satisfaction. Exit interviews provide valuable information in regards to employees leave reasoning that can be used to improve employee retention rates.

ThPA S.A. takes precautionary measures to prevent potential negative impacts on its workforce. The key to its continued success/operations is the periodic review of workplace policies with emphasis in the areas of discrimination, harassment, and health and safety. To mitigate risks, proactive risk assessments are evolved in recognizing possible risks that may materialize in the future and constant internal audits are undergone with the purpose of ensuring compliance. Furthermore, the Company regularly reviews turnover statistics, complaints and absenteeism in order to identify patterns that may indicate other issues.

To further alleviate risks, the Company has set up mental Health and wellness support programs and offers flexible work arrangements to address issues concerning the work-life balance. At the end of 2024, ThPA S.A. initiated a collaboration with a specialized firm to provide employees and their family members with 24/7 access to professional counseling support services from qualified mental health advisors. This program offers anonymous and unlimited use of the 24-hour Counseling Support Helpline, ensuring that all counseling sessions and any interaction with mental health professionals remain strictly confidential and protected by privacy regulations, complying with privacy regulations. This initiative is included in the broader Employee Assistance Program provided by ThPA S.A., which includes mental health counseling, designed to help employees and their families navigate personal and professional challenges.

To address the challenges identified as a result of Double Materiality Assessment and its impact on the workforce at ThPA S.A., the Company has implemented several initiatives aimed at mitigating these impacts and fostering a more inclusive, safe and performance-driven environment.

- **Gender Diversity:**

In white-collar roles, -which include professional, managerial, or administrative positions that typically involve office-based work, or decision-making responsibilities rather than manual labor- 20% of the workforce are females in ThPA S.A. The Company intends to boost female representation in blue-collar jobs, such as dock-working and machines operation, through specific outreach and training programs.

- **Performance Evaluation:**

A new performance evaluation system has been developed and will come into effect in 2025 to secure consistent feedback and improve employees' prospects for career development.

- **Health and Safety:**

As it involves heavy machinery and hazardous cargo handling, ThPA S.A. has strengthened the provision of safety measures, thus conducting regular training, providing good quality equipment protection and improving safety protocols to develop safe working environments. As a result of the improved safety protocols that are in place, no fatal incidents and zero fatalities resulting from work-related injuries or ill health among its employees were recorded during this reporting period.

ThPA S.A. demonstrates a proactive commitment to social engagement by fostering inclusivity, enhancing workforce well-being and ensuring effective communication with all employees. Although there is no specific performance evaluation policy yet, ThPA S.A. has established a formalized recruitment process to attract employees transparently and addresses equal opportunities, inspiring its employees to follow their own career path and reach their full potential in the Company. ThPA S.A. is focusing on recruiting more women in white-collar roles, as gender discrimination is addressed in the Company's Diversity Policy. The Company has also developed an employee benefits initiative to mitigate potential work-life balance issues, which includes medical insurance and retirement compensation, nursery school, meal voucher, wedding allowance, excellence awards for employees' children that graduate, provision of milk and loans for emergency financial needs or health reasons. In addition, ThPA S.A. takes into consideration the different needs of each role and provide additional benefits based on job requirements and ranking.

Moreover, ThPA S.A. is in the process of developing training materials focused on sustainable development, which will be made accessible to all employees through its intranet. While no formal training programs at this level have been provided to date, the Company is planning to deliver relevant presentations via email to ensure everyone has access to essential information and training on sustainability topics. Furthermore, the intranet will serve as a centralized platform to activate these communications, hosting training modules, presentations and videos for easy access. ThPA S.A. aims to launch this initiative in 2025, ensuring comprehensive employee awareness in its sustainability efforts.



ThPA S.A. is also developing an Employee Handbook, providing its own workforce with a comprehensive guide which outlines Company policies, procedures and expectations. The Handbook ensures employees have access to key information regarding their rights, responsibilities, available benefits and company values. In addition, the Company develops an Employee HUB, where employees can access important resources, including HR policies, learning and development opportunities and internal announcements.

The Employee Pulse Surveys are conducted to gather feedback from employees on workplace satisfaction, engagement and well-being. The insights gathered from the Employee Pulse Surveys help ThPA S.A. identify areas for improvement and implement changes that enhance employee experience. The Company has also placed digital Signage Communication Channels across Company's sites to disseminate important updates, safety messages, Company news and engagement initiatives, ensuring real-time communication.

ThPA S.A. allocates resources in Training and Development Talent Management as part of its investments in workforce-related initiatives, demonstrating its commitment to workforce growth, skill enhancement, and career progression. This includes the development of learning programs to support employees in upskilling and the necessary tools and processes for evaluating employee performance and providing feedback. However, as stated in SBM-3 14 e, ThPA S.A. has not identified any impacts on its own workforce that arise from the transition to a greener-climate neutral economy, and thus, can not specify any measures taken in this context regarding Training and Development.

Metrics and Targets

SI-5 Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

Currently, ThPA S.A. has not set time-bound and outcome-related oriented targets that meet the requirements for effectively managing potential negative impacts, advancing the positive ones, or managing material risks and opportunities related to its own workforce. However, the Company acknowledges the significance of establishing targets to drive meaningful progress in this area and evaluates the data gathered from its employees to establish a more standardized process that will monitor how effectively its policies and actions address its material sustainability-related impacts, risks and opportunities for its own workforce. Some targets that have been set, relate exclusively to the top level of management, where they are potentially linked to additional benefits or performance-based remuneration. However, these targets and their alignment with remuneration structures have not been publicly disclosed. As such, no workforce-wide targets have been identified or implemented, as they are not applicable beyond the top management level.



SI-6 Characteristics of the Undertaking's Employees

The employee data used for turnover reporting is sourced directly from ThPA S.A.'s HR Management System. This data is reported in "Head Count" as a reflection of the number of employees that were active on 31.12.2024. The methodology ensures that the total number of employees leaving and joining is tracked consistently, providing an accurate reflection of turnover trends. ThPA S.A. has significant employment in Greece (headcount 558), while the number of employees is also presented in the Financial Statements. The metrics included have not been validated by an external body beyond the assurer.

Characteristics of the Company's Employees	Unit	2024
Total employees	No.	558
Male employees	No.	473
Female employees	No.	85
Other gender employees	No.	0
Permanent employees (male)	No.	398
Permanent employees (female)	No.	82
Permanent employees (other gender)	No.	0
Temporary employees (male)	No.	75
Temporary employees (female)	No.	3
Temporary employees (other gender)	No.	0
Non-guaranteed hours employees (male)	No.	0
Non-guaranteed hours employees (female)	No.	0
Non-guaranteed hours employees (other gender)	No.	0

Regarding the non-guaranteed number of employees, Greek labour legislation mandates that all companies, including ThPA S.A., pre-submit employee working hours through the Ergani Information System. This requirement ensures that scheduled working hours are recorded before the workday commences. Consequently, accurately measuring "non-guaranteed" employment, which implies fluctuating or unscheduled hours, becomes impractical within this regulatory framework. Furthermore, Greek labour law stipulates a standard daily work schedule of eight (8) hours and a standard weekly workload of forty (40) hours. ThPA S.A. is legally obligated to create and submit monthly work schedules for each employee to the Ergani System, and employees are required to adhere to these schedules.

Employee Turnover	Unit	2024
Rate of turnover	%	4.64
Total turnover	No.	25

During the reporting period, the total number of employee departures due to voluntary resignation, retirement, dismissal, or death in service was 25. The employee turnover rate for the same period was 4.64%.

SI-7 Characteristics of Non-Employee Workers in the Undertaking's Own Workforce

As part of its workforce, ThPA S.A. engages both self-employed workers and workers provided by employment agencies to meet specific operational needs. These workers contribute to the Company's business activities under defined contractual relationships while not being classified as direct employees of ThPA S.A. The total number of non-employees engaged by the Company during the reporting period has been calculated in full-time equivalent (FTE). ThPA S.A. tracks non-employee workforce numbers through contractual records and payroll systems for service providers. Data is gathered in collaboration with the Procurement and Finance departments, which oversee contractual engagements and supplier agreements.

The metrics included have not been validated by an external body beyond the assurer.

Characteristics of the Company's employees	Unit	2024
Number of non-employees in own workforce	FTE	247*

*According to ThPA S.A. and regarding the methodology of calculating specific number of non-employees in its own workforce: At Stavros facility, the 45 FTEs and the 134 FTEs in Security were calculated by translating the total hours into FTEs.

SI-8 Collective Bargaining Coverage and Social Dialogue

The Company ensures compliance with collective bargaining agreements, covering the majority of its workforce. Specifically, all employees, except of the Management, are subject to the terms and conditions established in the collective agreement. As the Company has no significant employment in any EEA country other than Greece, no country-specific coverage data is available for the region. Therefore, all reported data pertains exclusively to Greece. For non-employees who are not covered by a collective bargaining agreement, working conditions and terms of employment are determined through internal policies or individual agreements, ensuring compliance with industry standards and fair labour practices. However, non-em-

ployees who are directly hired by ThPA S.A. are subject to separate terms or agreements and are covered under the collective bargaining agreement. The percentage of ThPA S.A.'s total employees covered by collective bargaining agreements is 96.95%.

As ThPA S.A. has no significant employment in any other country in the EEA, all its employees in Greece are represented by workers' representatives (100%). The Company also does not have any representation agreements as an organization in compliance with the European Works Council (EWC), Societas Europaea (SE) Works Council, or Societas Cooperativa Europaea (SCE) Works Council.

The metrics included have not been validated by an external body beyond the assurer. [ESRS 2 MDR-M]

Coverage Rate	Collective Bargaining Coverage		Social Dialogue
	Employees – EEA (for countries with >50 employees representing > 10% total employees)	Employees – Non-EEA (estimate for regions with >50 employees representing >10% total employees)	Workplace representation (EEA only-for countries with >50 employees representing >10% total employees)
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	GREECE		GREECE

SI-9 Diversity Metric

Regarding the definition of top management, ThPA S.A. used its own definition which includes the following roles and positions: The Chairman of the BoD, the CEO, the Executive team and the Directors.

The metrics included have not been validated by an external body beyond the assurer.

Diversity	Unit	2024
Number of men at top management level	%	13
Percentage of men at top management level	%	76.47
Number of women at top management level	No.	4
Percentage of women at top management level	%	23.53

Diversity	Unit	2024
<30 aged employees	No.	45
<30 aged employees	%	8.06
30-50 aged employees	No.	297
30-50 aged employees	%	53.23
>50 aged employees	No.	216
>50 aged employees	%	38.71

SI-10 Adequate Wages

ThPA S.A. conducts benchmarking and examines the salary ranges of employees in other industries in Greece. Additionally, it implements a Company-level collective labour agreement for its employees, which sets wages 25%-30% higher than the minimum wage, ensuring that its employees are compensated with an adequate wage in line with industry practices. It should be noted the Management is not subject to the conditions laid down in the above-mentioned agreement.

The metrics included have not been validated by an external body beyond the assurer.

Adequate wages	Unit	2024
Percentage of employees that earn below the applicable adequate wage benchmark	%	0%

SI-11 Social Protection

All ThPA S.A.'s employees who are subject to the collective labour agreement, are covered by social protection through public programs and in accordance with national legislation, in cases of accidents, injuries, etc. Beyond the legally established benefits, ThPA S.A. offers additional programs and benefits aimed at further supporting and enhancing the well-being of its employees. These benefits include:

- A Group Health Insurance Plan that provides employees with coverage for primary healthcare and significant coverage for themselves and their dependents
- Retirement compensation

All ThPA S.A. employees covered by the collective labour agreement receive comprehensive social protection as mandated by Greek legislation. This protection safeguards against income loss resulting from sickness, unemployment, occupational injury, acquired disability, parental leave, and retirement. This, combined with public social protection, demonstrates the Company's dedication to employee well-being and financial stability during recovery periods. Furthermore, ThPA S.A.'s medical insurance provides additional coverage for income loss due to occupational injury

with disability effects, supplementing public social security. This reinforces the Company's commitment to employee security during challenging times. ThPA S.A. also adopts a highly supportive approach to parental leave, fostering work-life balance and contributing to an environment that promotes employee development and satisfaction.

There are no identified categories of employees who are excluded from these protections, ensuring comprehensive coverage for all employees across ThPA S.A.'s operations. The same conditions do not apply to non-employees, as they are not directly employed by the Company.

SI-12 Persons with Disabilities

ThPA S.A. employs 1 disabled person. ThPA S.A. actively conducts awareness seminars and workshops to generate an environment that is inclusive and supportive. These initiatives are aimed at developing understanding, compassion and respect towards people with disabilities, while dismantling misconceptions and reducing stigma.

Employment and inclusion of persons with disabilities	Unit	2024
Persons with disabilities amongst its employees subject to legal restrictions on the collection of data	%	0%

The metrics included have not been validated by an external body beyond the assurer.

SI-13 Training and Skills Development Metrics

ThPA S.A. has not yet implemented a performance/career development review system for its employees and thus, no employee has participated in regular performance review and career development review. However, the preparation for implementing the measure has been completed and it is awaiting approval from the BoD in order to be launched in 2025. In order to calculate the average number of training hours, the headcount figures for total employment and employment by gender were used in the denominator of the metric, in line with ESRS S1-6.

ThPA S.A. recognizes that employee training is reinforcing development, enhances skill-building and ultimately boosting performance. The Company offers a diverse range of reskilling and upskilling programs to effectively address critical issues such as risk management, sustainability and health and safety, giving its people the opportunity to upgrade both their hard and soft skills and maximize their potential. ThPA S.A.'s Training and Development Policy provides with the opportunity to effectively select training programs by aligning the Company's goals with

employees needs and expectations. The Policy dictates the evaluation of training based on four criteria: feedback, learning, behaviors and outcome. Moreover, it outlines the Annual Training Plan, prepared by the HR Department based on training proposals submitted annually by Department Heads/Supervisors. The training plan is communicated internally at the end of each year, with progress reports issued quarterly to track and monitor the effectiveness of our training programs.

Additional to its formal training programs, ThPA S.A. has established a dedicated induction training program for new employees, which is designed to ensure the smooth transition into the Company's culture, values and operation. Through this induction training, new employees receive key information about ThPA S.A.'s operations, organizational structure, policies, procedures and its people. The primary goal is to provide them with a thorough understanding of the Company's processes and guiding principles, enabling them to manage their new roles efficiently and successfully.

Training and skills development	Unit	2024
Male employees that participated in regular performance and career development reviews	No.	0
Female employees that participated in regular performance and career development reviews	No.	0
Other gender employees that participated in regular performance and career development reviews	No.	0
Number of reviews in proportion to the agreed number of reviews by the management	Rate	0
Average number of training hours per male employee	No.	16.62
Average number of training hours per female employee	No.	7.84
Total average number of training hours per employee	No.	15.28
Average number of training hours per other gender employee	No.	0

The metrics included have not been validated by an external body beyond the assurer.

SI-14 Health and Safety Metrics

ThPA S.A.'s nature of work imposes heavy machinery and hazardous materials, leading to increased chances of accidents and injuries. Ensuring that ThPA S.A.'s approach is aligned with international standards, the Company has adopted an Occupational Health and Safety Management System, certified according to ISO 45001: 2018, which applies to all employees across all business units.

Regarding number of fatalities, the metric refers to the fatalities registered across ThPA S.A.'s own employees and other workers working on ThPA S.A.'s sites resulting from work-related injuries or work-related ill health. The number of work-related accidents refer to the consolidated number of accidents occurred for employees within the reporting period recorded in local health and safety management systems of ThPA S.A. It is worth mentioning that the nature of the recorded work-related accidents across

ThPA S.A.' employees does not form significant trends or patterns. The number of work-related ill health refers to the consolidated number of ill health cases occurred for employees within the reporting period recorded in local health and safety management systems of ThPA S.A. and include acute, recurring and chronic health problems caused or aggravated by work conditions or practices.

The number of days lost refers to the number of days lost, from and including the first full day and last day of absence and including all calendar days of the period (e.g., incl. weekends and public holidays). The LTIFR of recordable work-related accidents represents the number of work-related accident cases per one million hours worked and is calculated by dividing the number of cases registered in the reporting period by the aggregated working hours in ThPA S.A. and multiplied by one million.

Health and Safety	Unit	2024
Fatalities as a result of work-related injuries or work-related ill health (for own employees)	No.	0
Number of fatalities as result of work-related injuries and work-related ill health of other workers working on undertaking's sites	No.	0
Recordable work-related accidents	No.	6
Recordable work-related ill health	Rate	0
Days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health	No.	30
Percentage of recordable work-related accidents	%	5.58
Percentage of people in its own workforce who are covered by health and safety management system based on legal requirements and (or) recognized standards or guidelines	%	100

During the annual audits of the ISO 45001 system, a review of the indicators is always conducted; however, they are not validated or verified as in other ISO standards.

SI-15 Work-Life Balance Metrics

Family-Related Leaves

All ThPA S.A. personnel, regardless of gender, have the legal right to take parental leave, in accordance with the current national legislation. Parental leave covers both the needs of new parents to care for their children and to create a working environment that respects and supports the family.

Working Conditions

Work-life balance	Unit	2024
Percentage of total employees entitled to take family-related leave	%	96.59
Percentage of total entitled employees that took family-related leave	%	9.28
Percentage of male employees that took family-related leave	%	8.79
Percentage of female employees that took family-related leave	%	11.90
Percentage of other gender employees that took family-related leave	%	0

SI-16 Remuneration Metrics (pay gap and total remuneration)

ThPA S.A. calculates the pay gap by checking the earning of specific demographic groups, which include gender among the most prominent, thus revealing any inequities in compensation between employee groups. Total remuneration represents the entire earnings category, with base salary and performance bonus. Reporting frequency depends on the needs of the Company, the data can be reported yearly, quarterly, or monthly. ThPA S.A. maintains a collective bargaining agreement with the Unions and with this way promotes equal pay, ensuring no salary discrimination between men and women in equivalent positions. Remuneration metrics are calculated using gross salary and cash/in-kind benefits. The total remuneration ratio is de-

termined by dividing the highest-earning employee's total annual compensation (including all benefits) by the median annual salary of all other employees at ThPA S.A. Annual salary is defined as taxable income plus employer and employee pension contributions, excluding the highest-earning employee's income from the median calculation.

All calculations on compensation metrics are directly done by the HR department, with an Excel sheet that encompasses its calculation formula. This ensures the quality of these measurements and their constant representation in terms of total compensation within the Company.

Equal Treatment and Opportunities for All

Gender equality and equal pay for work of equal value	Unit	2024
Gender pay gap	%	17.10
Annual total remuneration ratio	Rate	7.92

All the metrics included have not been validated by an external body beyond the assurer.



SI-17 Incidents, Complaints, and Severe Human Rights Impacts

ThPA S.A. confirms that only one case of work-related discrimination and harassment has occurred. Following an investigation, the relevant committee determined that the incident did not fall within the defined framework of violence and harassment and accordingly informed the employee. As a result, there have been no fines, penalties, or compensation claims for damages related to such violations. Additionally, no grievances, incidents, or complaints have been filed through the company's designated channels for its workforce to raise concerns. ThPA S.A.'s grievance and incident handling processes are designed to prevent and address any potential violations in a timely and effective manner. Since no incidents have occurred, the company has not been required to reconcile fines or compensation amounts for such violations.

Additionally, there have been no grievances, incidents, or complaints regarding social and human rights matters within the Company. As a result, there have been no fines, penalties, or compensation for damages related to such incidents.

Measures against violence and harassment in the workplace	Unit	2024
Incidents of discrimination, including harassment	No.	1
Complaints filed through channels for people in the Company's own workforce to raise concerns	No.	0
Fines, penalties, and compensation for damages as result of incidents of discrimination, including harassment and complaints filed	No.	0

Human right violations	Unit	2024
Severe human rights incidents connected to the Company's workforce	No.	0
Number of severe human rights issues and incidents connected to own workforce that are cases of non-respect of UN Guiding Principles and OECD Guidelines for Multinational Enterprises	No.	0
Fines, penalties and compensation for damages for the incidents described above and complaints filed	No.	0



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S3 AFFECTED COMMUNITIES

Strategy

SBM-2 Interests and Views of Stakeholders

ThPA S.A. recognizes the importance of collaborating with affected communities in shaping its strategy and business model. Through ongoing consultations, meetings and surveys, it ensures that the needs, expectations and concerns of the communities in which it operates are taken into account. These processes enable the Company to adapt its practices to the latest developments regarding sustainability issues and implement best practices while ensuring the protection of human rights and transparency in its actions.

SBM-3 Material Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

IROs to Affected Communities

ThPA S.A. has identified that through a regular engagement with local stakeholders, it enhances community participation in decision-making processes and supports sustainable communities, as local concerns and expectations are acknowledged and integrated into the Company's operations. The transparency of this engagement also fosters trust between the port and the community, integrating the port as a vital part of Thessaloniki. As a result of this, the open dialogue is regarded as one of the material opportunities for one's affected communities. Through the establishment of an open and continuous dialogue with the local community, the Company supports freedom of expression, enhances trust and builds a positive reputation, contributing to stronger community relations and potential support for future initiatives. Therefore, this respectful and open interaction with the affected communities could reduce social resistance to potential operational changes, investment projects or regulatory approvals.

The material impact that ThPA S.A. has identified is linked to its strategic decisions to support the port-city integration and promote open stakeholder engagement. This impact primarily occurs through the nature of ThPA S.A.'s operations, that are critical for trade, economic development and community well-being and contribute to regional development, infrastructure investments, and environmental and social sustainability.

Types of Affected Communities

ThPA S.A. recognizes that its business operations are likely to materially affect multiple stakeholder groups and throughout its value chain in the scope of its disclosures. The Company acknowledges the significance of identifying and understanding the diverse communities that may be affected by its operations. Through its DMA process the Company has identified three key groups that are subject to its material impact, including the port community, the local community and civil society organizations/NGOs. The port community includes businesses, operators, workers who are directly involved in port-related activities, and whose economic well-being depends on port operations. The local community consists of residents in Thessaloniki and its wider surrounding areas who may experience environmental, social as well as economic impacts. Civil society organisations and NGOs represent broader societal interests, advocating for social equity and environmental protection. As a port authority which only operates the port facilities, ThPA S.A. has recognized that its operations and its value chain could not lead to human rights impacts or cause heightened risks of harm to indigenous people.

As ThPA S.A. actively promotes freedom of expression and open communication by ensuring diverse stakeholder representation in the established Port Users' Council. Thus, the Company enables representatives of the local community to engage on legislative changes and investment projects, thereby strengthening dialogue for positive community impact.



Impact, Risk, and Opportunity Management

S3-1 Policies Related to Affected Communities

ThPA S.A. is dedicated to maintaining the port as an integral part of citizens' and visitors' daily lives while strengthening its connection with the local community. The Company's commitment remains steadfast in fostering trust-based relationships with the society of Thessaloniki by supporting vulnerable social groups and local institutions and associations. Its contribution goes beyond its core activities, extending through various social initiatives guided by collective effort and teamwork, working closely with stakeholders and investing in younger generations.

Despite the fact that ThPA S.A. has not established a formal Corporate Social Responsibility (CSR) policy or any other policy specifically referring to the management of its material IROs related to affected communities, the Company implements a comprehensive CSR program, which designs and carries out a wide range of social initiatives that highlight the cultural significance of Thessaloniki and the wider region, raise awareness on environmental and marine ecosystem issues, enhance the growth prospects of the wider region and provide support to social groups in need.

ThPA S.A. continuously reviews its interactions with affected communities, recognizing the necessity for creating a positive societal added value. While formal policies on affected communities and community engagement are under evaluation or have not been established yet, the Company has already implemented numerous initiatives that support social well-being and remains committed to developing specific policies to further strengthen its dedication to the community. The following society-related policies are applicable, covering ThPA S.A.'s operations and extending throughout the Company's value chain, with a particular focus on communities directly affected by its activities. Additionally, ThPA S.A. aligns its following policies with relevant national and European recognised guidelines and standards relevant to local stakeholders.

Code of Ethics

ThPA S.A.'s Code of Ethics, while initially focused on guiding employee behavior and internal operations, plays a key role in shaping the Company's relationship with local communities. High moral standards, integrity, non-distinction and no tolerance for violence in any form are regarded fundamental to ThPA S.A. promoting a culture of respect in relations with the outside world. The emphasis on compliance ensures adherence to ethical and legal standards in business practices, indirectly benefiting society by promoting responsible corporate behavior. Additionally, the provisions on gifts and donations are provisions of what ThPA S.A. views as ethically sound transactions, which can also influence how it engages with external parties. Although community engagement specifically is not detailed in the Code, principles such as transparency and collaboration are designed to ensure responsible relations with the local community, which form the basis of trust and respect between the two parties.



Policy to Prevent and Combat Violence and Harassment

ThPA S.A. is committed to maintaining a safe, inclusive and respectful work environment, taking strict action against any forms of violence and harassment. Though the policy was initially designed to ensure that employees and associated members work free of violence or harassment of any kind, its purpose however extends beyond ThPA S.A.' premises to various locations where the employees carry out work-related activities. These include public places such as transportation hubs, accommodation provided by the employer and external work-related events.

Consequently, the Company's commitment to prevention and combat of violence and harassment indirectly contributes to the general well-being of the local community. By guaranteeing that employees act respectfully in all work-related environments -all the way from a certain public place up to public interaction with community members in those very same public space- the Company plays a role in promoting a culture of inclusivity and mutual respect. Additionally, any violation of this policy in public spaces while representing ThPA S.A., are subject to the same strict internal procedures and disciplinary actions. Though these measures, the Company not only protects its own interest, but also promotes a respectful and safe environment in the broader community, aligning with its social responsibility commitments.

Environmental Policy

ThPA S.A.'s commitment to environmental management, as outlined in its Environmental Policy, directly and indirectly benefits society and local communities by minimizing negative environmental impacts. By adhering to ISO 14001:2015 and the current national and European legislative framework, the Company ensures cleaner air and water, minimizing environmental risks for nearby residents and marine life. By implementing appropriate environmental programs to improve environmental performance and operating in such a way to ensure the prevention of pollution, ThPA S.A. reduces the negative effects and improves the environmental performance of ThPA S.A.'s activities. Additionally, the Company's commitment to inform and raise environmental awareness among its staff, members of the Port Users' Council, suppliers and passengers passing through the port, on environmental management issues fosters responsible behavior and collective action to protect the environment.

Sustainability Policy

ThPA S.A.'s Sustainability Policy has set up specific commitments under the Social Engagement Strategic Pillar with the ambition to create social surplus and also promote sustainable growth -through its business operations- in the city of Thessaloniki and the wider region. Regarding the City-Port Integration, ThPA S.A. is committed to strengthening relationships, generating added value and creating jobs in the regions and communities where it operates. The Company is also determined to strongly support local businesses, forge links with local suppliers and increase its overall socio-economic impact. As city-port integration is a critical issue for the Company, ThPA S.A. is taking part in numerous events and initiatives that give back to the community, either in the form of infrastructure upgrade or social actions that provide chances of cultural integration.

With a view to enhancing communication and actively engaging with key stakeholders, the Company is dedicated to engaging with all its stakeholders, including local communities and involving them in the process of identification and management of its sustainability topics and concerns through open dialogue and collaboration. Therefore, the Company enhances its performance in this front and improves transparency, builds trust and navigates through emerging challenges and opportunities. ThPA S.A. recognizes the unique value each stakeholder group holds and seeks its contribution to feedback and shared progress, thus advancing ThPA S.A.'s commitment to sustainability.

Through these direct and indirect efforts, ThPA S.A. plays an active role in safeguarding that the port remains a responsible and sustainable gateway, benefiting both the local environment and the broader community.

Although ThPA S.A. does not have an established policy on Human Rights yet, it actively seeks to promote human rights principles within its operations. These commitments are reflected in already established policies, such as the Code of Ethics and the Sustainability Policy. Besides, through various initiatives, the Company aims to create social added value, enhance engagement with local stakeholders and contribute towards the well-being of affected communities. ThPA S.A. assesses its policies on an ongoing basis, showing its willingness for the further development of specific human rights commitments.

ThPA S.A. has established a standardized process for engaging with stakeholders, including the affected communities and is committed to fostering the engagement with all its stakeholders, as mentioned in the Sustainability Policy.

While there is no dedicated remedy mechanism specifically addressing human rights impacts on affected communities, the Company is committed to maintaining an open dialogue with the local communities. ThPA S.A.'s corporate social responsibility initiatives and stakeholder engagement mechanisms, help identify and mitigate any potential negative social impacts. The Company's goal is to stay informed and act on opportunities and risks identified through its engagement and dialogue with affected communities. Additionally, the Company remains dedicated to enhancing its approach by identifying additional ways to integrate human rights considerations into its policies and due diligence processes.

As ThPA S.A. operates as a port authority, it does not have any known conflicts or direct engagements with Indigenous people. However, the Company remains committed to respecting the rights of all communities within its area of operations.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.

S3-2 Processes for Engaging with Affected Communities about Impacts

ThPA S.A. recognizes the unique value of its stakeholder group's feedback and enhances communication with local communities, so that their views are incorporated into decisions affecting potential positive or negative effects. Engagement takes place through the established Port Community Council and various means of communication, surveys, public consultation, so the affected communities are able to raise their concerns and provide their feedback. Such interactions are periodic depending on the subject matter and facilitated by the relevant department head, relevant to the topic of the interactions, who ensures that the provided input informs the Company's sustainability strategy and operations. ThPA S.A.'s Chairman and CEO are those who generally lead the communication with stakeholders and are the Company's representatives in numerous meetings with local communities and the port community.

The effectiveness of the engagement is based on the analysis of the indirect feedback and incorporation of key concerns into relevant initiatives and corporate decisions. ThPA S.A. regularly assess the general approach of affected communities' engagement -not through an official mechanism- and is committed to making the necessary adjustments in terms of its frequency. Those responsible for dealing with issues arising from interaction and engagement with affected communities, although it is not recorded as a requirement that they have received specific training or capacity building, are required to behave in accordance with the Company's established conduct policies and are supported by ThPA S.A.'s staff where necessary in order to respond to the fullest extent possible.

S3-3 Processes to Remediate Negative Impacts and Channels for Affected Communities to Raise Concerns

While no material negative impacts have been identified, ThPA S.A. proactively engages with affected communities and has transparent processes in place for remedying and addressing concerns should any such impacts arise. The Company's approach includes increasing contributions to strengthen the positive impacts it has through sponsorships and ThPA S.A. effectiveness of its remedies through ongoing dialogue with stakeholders, participation in events and sustainability reporting.

To ensure affected communities can raise concerns, ThPA S.A. have established multiple communication channels, including our corporate website, social media, complaint forms, meetings with local bodies and open dialogue with NGOs and civil society. These mechanisms are both internally managed and developed in collaboration with third-party organizations to enhance accessibility and responsiveness.

Additionally, the Company supports the availability of these channels through its business relationships by promoting transparency, regular stakeholder engagement and awareness initiatives on ESG issues. ThPA S.A. actively tracks and monitors concerns through annual reports, sustainability audits, and dedicated initiatives, ensuring that stakeholders' feedback is integrated into Company's decision-making. This continuous monitoring process, combined with stakeholder involvement, helps to evaluate and improve the effectiveness of response strategies, reinforcing the commitment to sustainable and resilient community development.

ThPA S.A. is committed to maintaining the highest standards of ethics and professional conduct, adopting a zero-tolerance approach to illegal activities that could negatively impact its reputation and credibility. To uphold transparency and accountability, the Company has implemented a whistleblowing policy that allows employees, customers, suppliers and other stakeholders to anonymously report violations, irregularities, or misconduct. Reports must be made in good faith, with reasonable belief in their accuracy.

To protect whistleblowers, ThPA S.A. ensures that individuals who submit reports can remain anonymous if they choose. If a whistleblower provides their contact information for follow-up, their identity is safeguarded and disclosed only to authorized personnel. Additionally, the

Company has strict policies in place to protect individuals using this reporting mechanism from any form of retaliation, reinforcing a safe and trustworthy environment for raising concerns.

The Company remains always open to receiving complaints and concerns from citizens, ensuring transparent and confidential handling of all issues raised. However, as mentioned earlier, there have been no noteworthy complaints to date that would necessitate a formal review. To assess whether affected communities are aware of and trust these mechanisms, the Company is considering conducting a survey to evaluate if citizens feel safe expressing their concerns, whether they trust that their confidentiality is protected and if they believe their issues will be effectively addressed. This approach aims to continuously improve engagement and responsiveness to community needs.





S3-4 Taking action on Material Impacts on Affected Communities, and Approaches to Managing Material Risks and Pursuing Material Opportunities Related to Affected Communities, and Effectiveness of those Actions

ThPA S.A serves as both a vibrant hub and a key attraction for visitors. Easily accessible, Pier No. 1 is a popular gathering place, offering a variety of cultural and recreational activities and indicating in practice the Company's commitment to port-city integration. Beyond its business services and operations, ThPA S.A. is committed to fostering positive social change and strengthening ties with the local community. Through open dialogue and targeted initiatives, the Company actively supports vulnerable social groups, cultural heritage and environmental sustainability. In 2024, ThPA S.A. contributed to numerous local organizations, reinforcing its dedication to corporate social responsibility. Its efforts include initiatives to assist financially challenged families, support individuals with visual impairments and promote environmental awareness—especially regarding marine ecosystem protection. Through these initiatives and actions, ThPA S.A. demonstrates a multifaceted commitment to societal well-being and therefore, to pursue the identified material opportunity.

A significant portion of its contributions is dedicated to community well-being, focusing on education and innovation and enhancing the open dialogue with the affected communities, by implementing a variety of actions, listed below:

- Support of the non-profit charitable Association "Syzoï". Specifically, ThPA S.A. supported of the 9th Mountain Race "Sizathlos" organized on annual basis by Syzoï. It is also noted that ThPA S.A. supports Syzoï -the Parents' Association of People with Vision Disorders & Additional Disabilities- since 2019.
- Support of the non-profit association "EduAct". Specifically, ThPA S.A. supported the FIRST® LEGO® League Panhellenic Final Competition and it is noted that ThPA S.A. supports this STEM-driven initiative of EduAct since 2023
- Educational Visits. ThPA S.A. welcomes students of all educational levels and institutions from both Greece and abroad to visit the port and get to know the history, activities, people, vision, mission and values of the Port of Thessaloniki. More information about this educational initiative is publicly accessible through ThPA S.A.'s website (<https://www.thpa.gr/sustainability/society/>)
- ThPA S.A. undergone an Underwater Sea Cleaning Action, for the first time at the Thessaloniki Waterfront, where 39 divers removed 1.5 tons of debris from the seabed. This initiative, complemented by an educational program for over 250 high school students, raises awareness of marine conservation. More information about this educational initiative is publicly accessible through the Company's website (<https://www.thpa.gr/underwater-sea-cleaning/>)

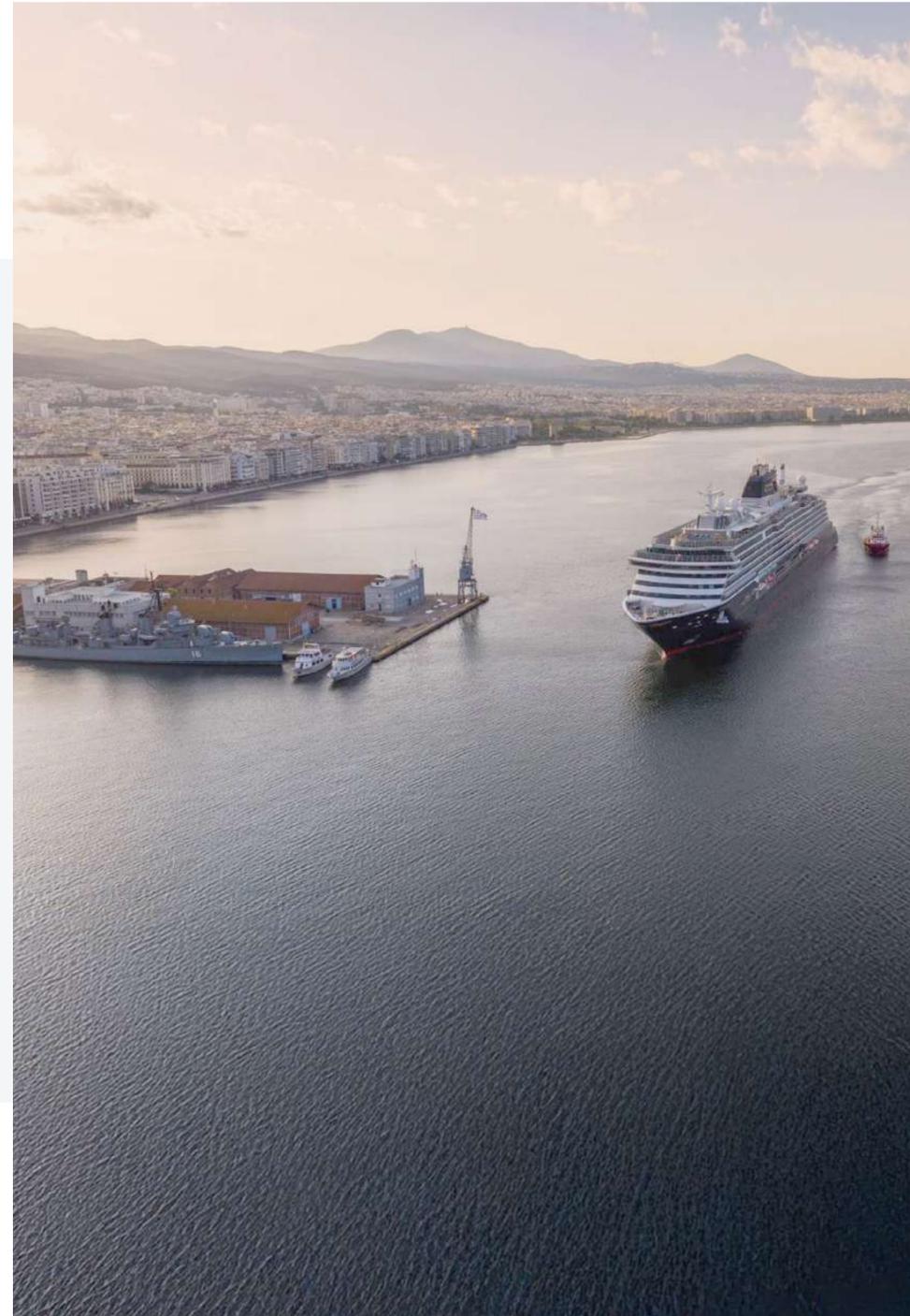
Through these actions, ThPA S.A. not only mitigates potential negative impacts but also actively contributes to social, educational, and environmental progress, reinforcing its commitment to sustainable and inclusive growth and leveraging the positive effects of the identified material opportunity.

ThPA S.A. assesses the effectiveness of its initiatives by actively monitoring key impact metrics and gathering feedback from affected communities. Specifically, the company tracks student participation numbers, conducts feedback surveys and utilizes post-visit assessments to evaluate the satisfaction and educational value of its programs. Additionally, ThPA S.A. engages with community members and partner organizations through surveys and consultations to ensure that its actions align with local needs and expectations, allowing for continuous improvement and meaningful impact.

These actions do not have a fixed time horizon, as they are ongoing throughout the year and, in many cases, are recurring on an annual basis. The continuous nature of these initiatives ensures that the Company remains responsive to evolving community needs and effectively manages material risks and opportunities over time.

The allocation of financial resources for managing material impacts on affected communities is not standardized or assigned in a predefined manner. Instead, ThPA S.A. allocates funding to support the various CSR initiatives aimed at addressing social impacts, fostering community engagement and promoting sustainable development. Even though relevant responsibilities to the management of material impacts related to affected communities are not formally structured within a specific framework that allows for direct inclusion in the sustainability statement human resources are dedicated to these efforts, including members of the Public Relations team and other departments/Divisions involved in community relations and stakeholder engagement.

ThPA S.A., by maintaining open channels of communication with all stakeholders and promoting transparency in its operations, reaffirms its commitment to ethical business practices and social responsibility. In this context, no significant human rights issues or incidents affecting local communities have been observed or recorded. This continuous engagement ensures that the Company remains attuned to societal concerns while upholding the highest standards of corporate governance and community relations.



Metrics and Targets

S3-5 Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

Currently, ThPA S.A. has not set time-bound and outcome-related oriented targets that meet the requirements for effectively managing potential negative impacts, advancing the identified positive impact, or managing material risks and opportunities related to affected communities. However, the Company acknowledges the significance of establishing targets to drive meaningful progress in this area.

ThPA S.A. is open to undertake any structural actions or upgrade existing engagement processes that involves engaging directly with the affected communities, their representatives and credible proxies. In the meantime, the Company gathers quantitatively and quantitative data from its implemented corporate social responsibility initiatives, such as the number of students participated in the educational visits and continuously assesses current practices and takes into account the wishes of the communities affected, to establish a process that will monitor how effectively its policies and actions addresses its material sustainability-related impacts, risks and opportunities for affected communities. Within the next reporting periods ThPA S.A. is committed to define a level of ambition, establish measurable qualitative and quantitative indicators to track progress and specify a baseline year from which progress will be measured.



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S4 CONSUMERS & END-USERS

Strategy

SBM-2 Interests and Views of Stakeholders

ThPA S.A.'s strategy and business model are deeply influenced by the interests, views and rights of consumers and end-users, with a particular focus on respect for human rights.

The Company maintains relationships with its end-users, which shape its strategy focused on responsible and transparent practices that ensure stability and credibility. It incorporates a commitment to the protection and needs of consumers. The Company focuses on building long-term relationships of trust, enhancing its social impact through responsible resource management, safety and transparency, ensuring that both end-users and consumers enjoy quality services with respect for human rights.

SBM-3 Material Impacts, Risks and Opportunities and their Interaction with Strategy and Business Model

ThPA S.A.'s business model reflects information-related impacts for customers, such as data privacy and customer satisfaction, as well as it reflects impacts related to the personal safety of consumers and end-users. By prioritizing consumer data privacy and aligning with GDPR's principles, ThPA S.A. enhances consumer trust and demonstrates a commitment to safeguarding personal information. Additionally, the Company promotes customer freedom of expression by monitoring and addressing customer concerns, and thus, it enhances transparency and accountability, which has positive impact. Specifically, it strengthens trust between the Company and its customers and helps build stronger relationships with stakeholders. Moreover, ThPA S.A.'s efficient communication and complaint resolution processes improve customer satisfaction and trust, fostering long-term client relationships. By addressing issues promptly and transparently, the Company enhances its service quality. In addition, ThPA S.A. places the highest priority on issues related to the personal safety of consumers and end-users. Ensuring their well-being is at the core of its operations and decision-making processes. The Company aligns with responsible labour practices by prioritising workplace health and safety for contractors, suppliers, and port users. Enhanced safety protocols, particularly in high-risk areas like port facilities, promote community well-being and minimise potential harm to individuals and communities.

The Company's material risks and opportunities in relation to consumers and/or end-users arise from actual or potential impacts rather than dependencies. While no critical dependencies on consumers and/or end-users have been identified, ThPA S.A. remains committed to addressing any material impacts to safeguard long-term trust, improve service experience, and maintain its market position.

All consumers and end-users who are likely to be materially impacted by ThPA S.A.'s operations, including those affected through its value chain, services, and its business relationships, have been included in the scope of this disclosure, in accordance with ESRS 2. The Company primarily serves contractors, suppliers and port users, who receive a range of services. In assessing potential material impacts, the Group has determined that certain customers may be subject to impacts related to their rights to privacy and personal data protection. However, the Company does not serve consumers or end-users of services that are inherently harmful to people or that increase the risk of chronic disease. Likewise, the Company does not have consumers or end-users who could be negatively affected in terms of their rights to freedom of expression or non-discrimination, nor does it serve consumers or end-users who rely on accurate and accessible service-related information, such as manuals or product labels, to avoid potentially damaging use. Additionally, ThPA S.A. does not have consumers or end-users who are particularly vulnerable to health impacts, privacy risks, or the effects of marketing and sales strategies, such as children or financially vulnerable individuals.

Based on the Double Materiality Assessment, no negative material impacts were identified in relation to consumers and end-users, therefore, no consumers or end-users with particular characteristics could be negatively affected.

Conversely, the positive material impacts derive from commitment to delivering high-quality services, protecting data privacy through a dedicated and established GDPR policy and minimizing potential harm to individuals and communities by implementing strict safety protocols. At the same time, internal security protocols and cybersecurity initiatives safeguard stakeholders' data privacy, fostering consumers' trust. Established processes such as an annual customer survey and a registry to record all customer interactions, further enhance transparency and accountability and foster long-term client relationships. In addition, the continuous improvements in service response enhance customer satisfaction. Moreover, signed agreements, documented procedures, and mandatory certifications alongside with implemented safety protocols and risk assessments and internal inspectors who oversee safety measures, particularly in high-risk areas such as port facilities, reduce the risk of harm to individuals and the broader community.

Furthermore, the DMA identified four opportunities and a risk arising from the material impacts which are relevant to all the Company's consumers and end-users. Regarding the opportunities, by maintaining a secure and compliant data management system, ThPA S.A. can mitigate potential financial risks associated with data breaches or compliance violations, which can result in fines and legal expenses. Additionally, the Company's commitment to maintain an open line of communication and addressing customer feedback can reduce reputational risk, lead to potential long-term revenue stability and minimize any cost associated with customer dissatisfaction. Moreover, ThPA S.A.'s efficient communication and complaint resolution process, makes the Company a preferred partner for clients who value responsive service and reliability, enhances its operational effectiveness and ultimately driving growth and

profitability. It is associated with continuous customer satisfaction, as it drives higher customer loyalty, fosters trust, and supports market share growth. In addition, investing in safety compliance and health protocols, can reduce the Company's insurance costs and liability, while fostering a safe environment. This commitment also strengthens the port's brand reputation.

Through the DMA, a risk was identified associated with potential safety incidents or non-compliance penalties, which could arise from any gap in implementing or enforcing health and safety protocols for consumers and end-users and would affect operational continuity and cause significant legal costs.

Based on the outcome of the materiality assessment conducted in accordance with ESRS 2 IRO-1, the Company has not identified any actual or potential negative impacts on consumers or end-users. Consequently, no specific consumer or end-user groups have been determined to be at greater risk of harm. However, ThPA S.A. remains committed to monitoring its services and maintaining open channels of communication to promptly address any concerns that may arise in the future.

ThPA S.A. has not identified any material risks or opportunities that relate to specific sub-groups of consumers and/or end-users, such as particular age groups or individuals with specific characteristics. Instead, the identified risks and opportunities relate more broadly to general categories of stakeholders such as suppliers, port users, and other service recipients. The Company remains attentive to potential emerging issues affecting specific groups and will reassess its approach as part of its ongoing stakeholder engagement and materiality assessment processes.

Impact, Risk, and Opportunity Management

S4-1 Policies Related to Consumers and End-User.

At ThPA S.A. to ensure that our business activities are conducted responsibly and with respect, we have developed and implemented a series of policies and regulations.



ThPA S.A. has designed and implements a Quality Management System in conformity with the requirements of the International Standard ELOT ISO 9001:2015, to meet the requirements of the modern business reality and ensure the ongoing improvement of its processes with a view to achieving top customer satisfaction.

The Quality Management System was designed based on the needs and aspirations of ThPA S.A. and in accordance with the legal and regulatory requirements of the applicable Greek and EU legislation and its scope is as follows:

- Mooring of Commercial vessels, passenger vessels and cruise ships
- Loading and unloading of containers, bulk cargo and general cargo
- Storage and transport of cargo
- Concession of sites for commercial and cultural activities

The Management commits to meet the requirements of all stakeholders and consolidate the customer confidence through the fulfilment of specific quality standards and the ongoing improvement of the effectiveness of the Quality Management System in conformity with ISO 9001:2015.

In this context, ThPA S.A., seeks:

- Compliance with the requirements of ISO 9001:2015
- Compliance with the applicable relevant legislation, International Codes and best practices
- Provision of ongoing information and training to all its employees through training programmes
- Constant improvement of the Quality Insurance System and the Company operations through the effective use of the following processes
 - Management Review
 - Internal Audits
 - Corrective Actions
 - Risk Management

To achieve the above goals, the Management:

- Commits to apply the principles of the Quality Policy and the Quality Management System that it establishes
- Commits to comply with the applicable Greek and EU legislation
- Informs its staff and encourages it to be bound by the same principles
- Commits to provide the infrastructure and equipment required for fulfilling its operations and implement properly the Quality Management System.

The implementation and certification of the quality management system aims at:

- Enhancing the Company's reputation by guaranteeing the customer confidence
- Creating opportunities for entering international markets as the Company's image and reliability improve
- Reducing production cost through the optimization of resource and time management
- Raising awareness of employees about quality management
- Ensuring ongoing improvement of processes based on the implementation of objective monitoring and measurement mechanisms and, therefore, upgrading the Company processes to generate value added.
- Creating a competitive advantage

The Company Management periodically reviews the principles and goals of this Quality Policy, the current version of which has been notified to all the staff.

At ThPA S.A., we also implement an ICT Security Policy to safeguard the company's information and the systems that manage it. Ensuring the confidentiality, integrity, availability and privacy of data is of vital importance. This policy establishes controls and safeguards against potential threats while enforcing a strong security framework to protect our information systems. This policy complies with ISO/IEC 27001 standard that specifies requirements for the establishment, implementation, monitoring and review maintenance and improvement of an information security management system.

At ThPA S.A. the protection of customer data is a top priority. Access is restricted to authorized users with credentials, while all data is hosted on on-premises servers safeguarded by advanced firewalls, in full compliance with GDPR regulations. Customer service is ensured through daily communication (via telephone and email), annual satisfaction surveys based on ISO quality standards and automated complaint management aimed at the continuous improvement of services. Additionally, digital tools such as QR codes and contact forms are utilized to provide users with direct access to services and relevant departments.

In addition, although there are no specific human rights policy commitments relevant to customers, including processes and mechanisms to monitor compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises, human rights principles are embedded in other ThPA S.A.'s policies, which comply with all applicable national and EU legislation related to customers and end-users. This underscores the Company's dedication to creating a framework where security, transparency, and respect are fundamental values.

Customer satisfaction is at the core of ThPA S.A.'s quality strategy. Committed to excellence, the Company maintains ongoing communication channels with customers through emails, its website and customer satisfaction surveys. These tools allow the submission of claims, requests and complaints while measuring satisfaction levels with the provided services. An annual Customer Satisfaction Survey is being conducted since 2021, evaluating customers' willingness to recommend services and their overall satisfaction. The survey results show a year-on-year increase in response rates and satisfaction levels, with the Net Promoter Score for 2023 improving by 117% compared to 2022. The results of the 2024 survey have not been evaluated yet.



Claims and Complaints Management

ThPA S.A. employs a structured and efficient process to manage claims, complaints, and requests, ensuring timely and effective resolution of any issues. All customer claims or complaints received by any department are directed to the Customer Service team, which promptly acknowledges receipt and engages the relevant divisions or departments to address the matter.

The claims and complaints handling process includes:

- **Notifying all relevant parties involved.**
- **Monitoring the progress of the claim or complaint.**
- **Informing customers about the resolution outcome.**
- **Updating the registry and CRM system upon case closure.**
- **Implementing corrective actions to enhance service quality.**

Claims, complaints and requests are documented in a weekly report, and a dedicated meeting is held to review progress by business unit and take corrective measures where necessary.

The Company has no recorded cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines for Multinational Enterprises related to consumers and/or end users.

During the reporting period, ThPA S.A has maintained open communication channels with all stakeholders regarding any potential changes, interventions, revised approaches to due diligence, or remedial measures related to policy adjustments. However, as of now, no such modifications have been deemed necessary, due to the absence of incidents and the minor significance of recorded complaints.

The responsible Regulatory Compliance & Risk Management Officer is tasked with continuously monitoring the regulatory framework and relevant requirements, ensuring that the Company remains fully aligned with applicable laws and regulations. Additionally, the Officer proposes measures and best practices to enhance compliance and manage potential risks, establishing a strong operational framework that safeguards the company while promoting transparency and reliability.

Through the established engagement mechanisms, ThPA S.A actively gathers feedback and input from stakeholders. This feedback is systematically monitored, evaluated, and assessed to determine its relevance and feasibility for integration into ThPA S.A policies and operational framework. However, the Company has not established a dedicated process that explicitly describes how the interests of key stakeholders are considered when setting policies related to consumers and end-users. While stakeholder interests are considered through the general engagement activities mentioned, there is no formalized mechanism to enhance transparency by further outlining how consumer and end-users interests are taken into account within its broader strategy.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.

S4-2 Processes for Engaging with Consumers and End-Users About Impacts

ThPA S.A. ensures engagement with consumers, end-users and their legitimate representatives through direct communication and credible proxies, as part of its commitment to transparent stakeholder dialogue. Engagement is conducted at various stages, including the identification and resolution of sustainability issues, using diverse methods such as consultations, surveys and assessments, in compliance with the Accountability AA1000 Stakeholder Engagement Standard. These engagements are held periodically, fostering open dialogue to address economic, social, and environmental concerns, aligning with stakeholders' expectations and reinforcing trust and transparency.

The operational responsibility for ensuring stakeholder engagement at ThPA S.A. lies with the Executive Chairman of the Board of Directors and the Chief Executive Officer. The Executive Chairman chairs the periodically meetings with Shipping Agents Association of Thessaloniki and the Hellenic Ports Association, Thessaloniki Port Users' Council, with the active participation of the CEO, ensuring that communication with the port community occurs effectively. These meetings provide a platform for stakeholders to engage in meaningful dialogue, share information and discuss key issues such as port services, sustainability initiatives and strategic developments. The involvement of these senior leaders underscores the Company's commitment to fostering transparency and collaboration with stakeholders.

Stakeholder Group	Communication Channels	Interests & Expectations	ThPA S.A. Response
Customers, Shipping and Terminal Operators Daily Communication	Complaint Procedures	Customer Satisfaction Innovation	Grievance Mechanisms
	Corporate Website	Fair Business Practices	ISO 27001
	Working Groups Survey	Data Privacy & Security	Information Security
	Working Groups	Products/Services Safety & Quality	Processes
	Survey	Sustainable Products/ Services	Total Quality and Business
	Newsletters		Excellence Systems
			Research & Development
		Processes Audits	

At ThPA S.A., the views of consumers and end-users play a crucial role in shaping decisions and actions aimed at managing both current and potential impacts. Through regular engagement with stakeholders, such as the Thessaloniki Port Users' Council, ThPA S.A. actively gathers feedback on key issues, including port services and sustainability initiatives. This input guides the Company's strategic planning, ensuring that business activities align with the needs and expectations of its users, while addressing any emerging challenges to enhance overall performance and mitigate impacts.

S4-3 Processes to Remediate Negative Impacts and Channels for Consumers and End-Users to Raise Concerns.

ThPA S.A. adopts a proactive approach by establishing processes that enable the immediate and effective management of any issues that may arise for its customers and consumers. Through systematic monitoring of customer satisfaction indicators and the management and analysis of complaints via a specially designed digital platform, the Company ensures that customer needs are considered and addressed. Committed to the continuous improvement of its services, the Company remains dedicated to providing an overall positive experience for its customers, enhancing their trust and satisfaction.

The Company has established communication channels to support its customers and address any concerns related to its operations, products, and services. Customers are encouraged to reach out directly through phone or email to report complaints, ask questions, or share feedback. These channels are designed to ensure prompt and effective responses, allowing the Company to resolve issues efficiently and maintain a high level of customer satisfaction. Through this approach, the Company aims to foster open communication and provide timely solutions to any concerns that may arise.

ThPA S.A., as part of its stakeholder communication efforts, holds annual meetings with the Thessaloniki Port Users' Council, coordinated and overseen by Strategic Communications. In 2023, the meeting was held via videoconference on November 21, chaired by the Executive Chairman of the Board of Directors and actively attended by the Chief Executive Officer. These meetings serve as a platform for the port community to exchange information, engage in constructive discussions, and address matters of shared interest, particularly initiatives related to the services provided by the port.

The 2023 meeting brought together 19 representatives from 18 organizations within the broader port community. Participants were updated on recent developments, including ThPA S.A.'s investment plans, operational activities, and sustainability initiatives. Key topics of discussion included the Port of Thessaloniki's connectivity, the expansion of intermodal services, the urgent need to upgrade the existing railway infrastructure, ThPA S.A.'s growth strategy, and collaborations with internationally significant ports. Additionally, the growth of the cruise industry drew significant interest.

These Port Community meetings underscore the value of transparent communication between ThPA S.A. and its stakeholders. Such collaborations are vital to enhancing the port's development and competitiveness on a global scale while strengthening supply chains across Southeast, Central, and Eastern Europe.

The Customer Service Department handles and responds to all incoming requests, complaints, and claims efficiently, ensuring timely and effective communication with stakeholders. To enhance service quality and streamline processes, a Customer Relationship Management (CRM) tool is actively in use at ThPA S.A., allowing for better tracking, management, and resolution of customer interactions. This system ensures that every inquiry is addressed promptly, fostering transparency and customer satisfaction.

S4-4 Taking Action on Material Impacts on Consumers and End-Users, and Approaches to Managing Material Risks and Pursuing Material Opportunities Related to Consumers and End-Users, and Effectiveness of those Actions

ThPA S.A. is committed to quality management and ensuring customer satisfaction. This commitment is exemplified through the implementation of the ISO 9001:2015 standard. The ISO 9001:2015 certification provides a framework for all processes, ensuring that ThPA S.A. consistently delivers services that meet and exceed customer expectations while effectively addressing the demands of the maritime industry.

The Company's Quality Policy serves as the foundation of its operations, incorporating rigorous procedures for ongoing monitoring and continuous improvement. This approach guarantees that all services uphold the highest industry standards. Quality excellence is embedded across all Management Systems, reflecting ThPA S.A.'s dedication to setting and surpassing benchmarks within the maritime sector.

In pursuit of offering reliable, modern, and competitive services, ThPA S.A. has achieved the following certifications:

- ISO 37001:2016 – Anti-bribery management system.
- ISO 50001:2018 – Energy management system.
- ISO 14001:2015 – Environmental management system.
- ISO 45001:2018 – Occupational health and safety management system.
- ISO 22301:2019 – Security and resilience, ensuring business continuity through robust plans and processes.
- ISO 27001:2013 – Information security management system applied to the container and conventional (bulk) cargo terminal information systems.
- Authorized Economic Operator (AEO) License – Security and Safety (AEOS), recognizing ThPA S.A. as a secure and reliable partner in the global supply chain for meeting stringent safety and security criteria.



Inspection Procedure

As part of our commitment to Health and Safety beyond the immediate confines of the port, ThPA S.A.'s Quality, Health, and Safety Department conducts inspections of ships docking at the port. These inspections aim to mitigate safety risks during loading, unloading, and onboarding operations.

The inspections assess the Health and Safety conditions of these operations and the onboarding of vessels serviced by ThPA S.A.'s employees. Detailed reports are prepared by the H&S Department, identifying any safety risks or instances of non-compliance, which are then communicated to vessel masters to ensure appropriate corrective actions are taken.

In 2023, the inspection procedure was updated to address the port's evolving operational requirements and to reinforce our commitment to maintaining high Health and Safety standards.

Incident Investigation

At ThPA S.A., we document and thoroughly investigate all incidents that could potentially lead to accidents, ensuring that appropriate measures are taken to prevent recurrence. For every incident, regardless of its severity, a defined procedure is followed to record, analyze, and evaluate the circumstances in which it occurred. Corrective actions are then implemented to address the root causes and prevent future occurrences.

Following each incident, we also review the need to update our Occupational Risk Assessment (ORA) or develop new safety procedures and guidelines. This approach enables continuous improvement of our Health and Safety Management System, reinforcing our commitment to a safe working environment.



Incident Reporting & Investigation

As part of the incident investigation procedure for incidents occurring within our premises, the process involves reporting the incident with a detailed description and all relevant documentation. Each incident is assigned a risk level based on its severity and the likelihood of recurrence. The root causes are analyzed, focusing on immediate causes, personal factors and job-related factors. If necessary, further actions are taken, which may include implementing corrective measures, introducing new safety controls, updating procedures, or revising risk assessments.

ThPA S.A in order to track and assess the effectiveness of actions and initiatives in delivering outcomes for consumers and end-users follows a comprehensive approach. Collaboration between cross-functional teams and all relevant departments ensures the development of the most effective solutions. Customer feedback is actively collected through various channels, enabling continuous improvement. A structured Customer Satisfaction Survey is conducted, with a questionnaire designed to measure satisfaction levels across different port segments. Additionally, open communication channels facilitate ongoing engagement, allowing customers to share their feedback and concerns, which are carefully evaluated to enhance services and operations.

Research and Development

ThPA S.A.'s participation in EU R&D projects enhances its Environmental, Social, and Governance (ESG) performance by addressing key sustainability and social responsibility challenges through the adoption of targeted practices.

The HECTOR project, aligned with EU priorities for protecting public spaces, strengthens the resilience of tourism infrastructure by fostering collaboration between public and private stakeholders. It ensures safer environments for communities and economies reliant on tourism by utilizing existing EU tools, methods, and recommendations. Bringing together expertise from law enforcement, municipalities, academia, and tourism operators, HECTOR provides a unified strategy for addressing the specific security needs of the tourism sector, promoting safety for tourists and local communities.

The POSEIDON project advances environmental sustainability by exploring the use of synthetic methanol (e-methanol) to decarbonize the shipping industry. This initiative supports cleaner maritime transport and underscores social responsibility by fostering local value chains and involving community input, driving inclusive innovation.

The INTERNET OF CONTAINERS project utilizes IoT technologies to enhance container management efficiency in ports, reducing operational disruptions and optimizing time-sensitive processes. This contributes to governance through greater supply chain transparency and to environmental sustainability by minimizing emissions from inefficient logistics practices.

Together, these projects promote a more sustainable, socially responsible, and well-governed approach across tourism, shipping, and logistics, creating safer societies, cleaner operations, and better governance within these sectors.

For the year 2024, there are no major accident incidents requiring large-scale rehabilitation actions.

The actions implemented by ThPA S.A. do not require significant operational or capital expenditures. Therefore, they are not classified as material in terms of monetary amounts.



Metrics and Targets

S4-5 Targets Related to Managing Material Negative Impacts, Advancing Positive Impacts, and Managing Material Risks and Opportunities

ThPA S.A. is committed to enhancing its services, ensuring safety of operations and maximizing efficiency, productivity and service quality for its customers and end-users, and aims to provide to its customers services of the highest quality, while continuously improving its operations. However, no formal targets have been set yet for managing material negative impacts, advancing positive impacts, or addressing material risks and opportunities.

Based on its ongoing commitment to delivering the best customer experience and following the outcome of the DMA and internal discussions with various divisions, the Company is open to exploring the possibility of tracking customer experience through specific outcome-oriented and ongoing targets. Established customer feedback mechanisms are in place and will be further strengthened if necessary to proactively enhance services, personalize customer interactions, and drive innovation and technological investments, ensuring sustained customer satisfaction, loyalty, and market growth.

Additionally, while no measurable outcome-oriented targets have been set regarding data privacy, the Company continuously monitors the effectiveness of its policies and actions by tracking data privacy incidents and adhering to its Security Protocols. For the 2024 reporting period, ThPA S.A. recorded zero incidents of data breaches, leaks, thefts, or losses of customer data.

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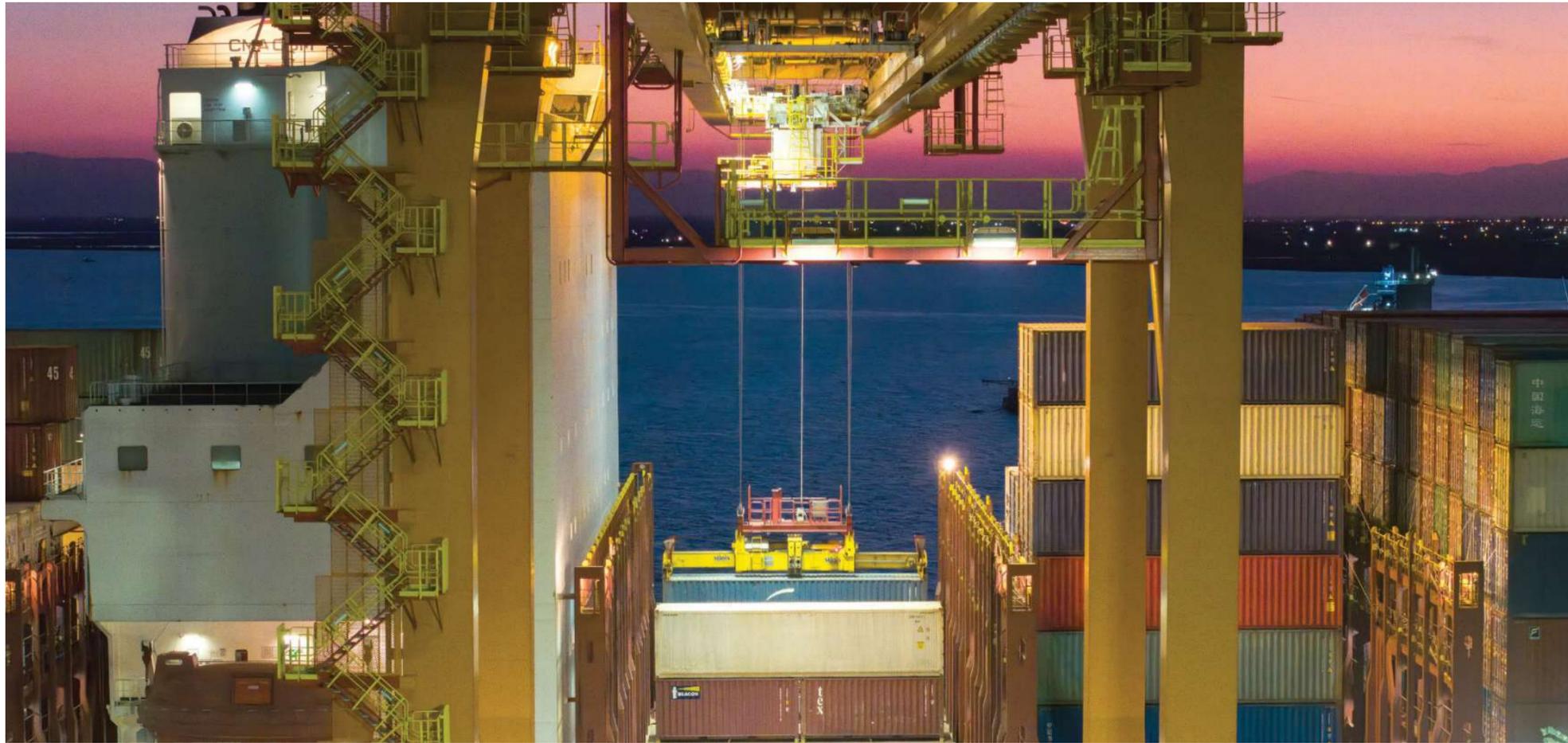
GI BUSINESS CONDUCT

Governance

GOV-1 The Role of the Administrative, Supervisory and Management Bodies

ThPA S.A.'s primary goal is to safeguard the interests of its shareholders, and all stakeholders, including customers, employees, suppliers, and the community. Recognizing the importance of corporate governance principles and the benefits derived from their application, the Company adopts regulations, policies, and practices that align with the regulatory framework, integrating them into its corporate culture.

ThPA S.A. has adopted the Hellenic Corporate Governance Code-HCGC by the Hellenic Corporate Governance Council-HCGC (June 2021), with certain deviations, as those are analytically described in the Corporate Governance Statement, which is released incorporated, according to the provisions of the law, in the Annual Financial Report. The Hellenic Corporate Governance Code follows the "comply or explain" principle, guiding companies in adopting best practices and formulating corporate governance policies and practices tailored to their specific circumstances.



Furthermore, ThPA S.A. has adopted a detailed Internal Regulation, in accordance with article 14 par. 2 of Law 4706/2020, that defines the organizational structure, the roles of the organizational units, the standing committees of the Company, as well as the duties of their heads and their reporting lines. These rules outline the main characteristics of the Internal Control System, i.e. the operation of the internal audit department and compliance and risk management officer, and the policy and procedure for conducting a periodic assessment of the Internal Control System, in particular concerning the adequacy and effectiveness of financial information, on an individual and consolidated basis, risk management and regulatory compliance, in accordance with recognized evaluation and internal audit standards, as well as the implementation of corporate governance provisions. This assessment is carried out by persons who have proven relevant professional experience and do not have dependent relations with ThPA S.A.

Moreover, the Regulation defines the process of hiring senior managers and evaluating their performance. Also, it describes the process of compliance of persons holding managerial duties, as defined in Article 3 par. 1 num. 25 of Regulation (EU) 596/2014, and persons having close ties with them, including the obligations arising from the provisions of Article 19 of Regulation (EU) 596/2014. The process of notifying any dependent relations of the independent non-executive members of the Board of Directors and the persons who have close ties with them is also outlined, as well as the process of compliance with the obligations related to related party transactions. The Regulation also highlights policies and procedures for the prevention and response to situations of conflict of interest, the policies and procedures for compliance of the Company with the laws and regulations governing its organization and operation, and its activities and the procedure adopted by the Company for the management of privileged information and the proper information of the public, in accordance with the provisions of Regulation (EU) 596/2014.

ThPA S.A.'s administrative, management, and supervisory bodies are also key to establishing and maintaining responsible business conduct. The Board of Directors (BoD), sets the Company values, approves its business plan and strategy and supervises its execution. It is responsible for defending corporate interests, managing assets and assessing risks and opportunities in accordance with legal and regulatory requirements. The BoD reviews the Company's strategy and key risks annually. This way it ensures that the business stays aligned with its objectives and strictly follows applicable regulations. Some of its duties related to business conduct are delegated to other executives and committees (such as the Executive Chairman, the CEO or the Executive Committee), to ensure smooth operations and good governance. Also, the Company has established a Policy for the Prevention and Handling of Conflicts of Interest and a Manual on Procedures for Conflict Management, ensuring that personal interests do not interfere with Company governance.

Ethical practices are embedded in every aspect of the Company, spanning decision-making processes and interactions with customers, employees, suppliers, and the community. Several committees that support the BoD and provide targeted oversight, are ensuring the transparency, integrity, functionality and effectiveness of ThPA S.A.'s corporate governance and business conduct: The Nomination Committee shortlists candidates for leadership roles, underlining ESG expertise among others and the Remuneration Committee ensures fair and transparent compensation practices in accordance with Company policy. The Audit Committee strengthens accountability through monitoring internal controls, financial reporting and compliance. Also, the Sustainability Committee focuses on implementing and aligning the Company's ESG strategy, offering guidance to both the BoD and the Executive Committee, which manages operational decisions. These bodies combined, ensure that business conduct reflects the Company's goals, values, and commitment to long-term sustainability. They oversee the Company's governance, strategy, and compliance with legal and ethical standards.

The expertise of the administrative, management and supervisory bodies on business conduct matters is ensured through a robust Suitability Policy. This policy outlines principles and criteria for selecting, replacing and renewing members of the Board of Directors, focusing on individual and collective qualifications. It ensures the BoD's composition aligns with the Company's strategy, business goals and commitment to promoting corporate interests. The Nomination Committee actively oversees the policy's implementation, recommending updates when needed to maintain its relevance and effectiveness. Detailed resumes of BoD members, showcasing their expertise, are publicly accessible on ThPA S.A.'s website, alongside the Suitability Policy itself. For more information regarding the administrative, management and supervisory bodies, as well as their expertise, please refer to the Corporate Governance Statement.

Impact, Risk, and Opportunity Management

GI-1 Business Conduct Policies and Corporate Culture

ThPA S.A. promotes a strong corporate culture and responsible business practices through clearly defined policies and procedures governing its activities. Among them lies the Code of Ethics which underlines the Company's commitment to integrity, transparency and ethical conduct in all its activities. The achievement of business results should align with basic principles that guide employee, customer, supplier and partner interactions with the Company. Other policies, such as the Conflict of Interest Policy, the Business Continuity Policy, the Anti-bribery policy, the Learning and Development Policy and the Risk Management Policy, equally support these commitments through addressing specific aspects of business conduct.

The Company has also adopted the Hellenic Corporate Governance Code (HCGC) in line with national standards for accountability and transparency. Any deviations from this code are stated in the Corporate Governance Statement included in the Annual Financial Report and available on the Company's website. Together these policies and practices demonstrate ThPA S.A.'s commitment to build trust and strong relationships with stakeholders as well as promote ethical behavior.

ThPA S.A. cultivates its corporate culture through a well-structured approach, containing policies focused on defining ethical behavior, transparency and engagement of its employees. The Company currently pursues a consistent code of conduct by establishing policies and procedures that promote integrity within its operations and across the value chain.

The Cultural Reengineering Program is the key change driver that was launched in 2023 and set for completion in 2025. The main aim of this cultural reengineering program is to create a supportive and cohesive work environment via open communication and participation. The program would incorporate activities, ranging from Q&A sessions with leadership to internal networking events and updates on what is happening within the Company. Staff welcome kits and employee handbooks help new hires as well as current employees to align with the values of ThPA S.A. from the start, while engagement and poll surveys provide useful feedback for further improvement of the employee experience.

Through these efforts, ThPA S.A. allows itself a chance to establish, develop, promote and evaluate its corporate culture over time, in order to be consistent with the Company's strategic vision for the well-being of its people.



In ThPA S.A. there are clearly defined mechanisms to identify, report and investigate concerns regarding unlawful behavior or breaches of its Code of Ethics. Suspected violations are reported by employees to their superiors, while managers and members of the BoD report such issues directly to the Audit Committee. Anonymous reporting is also available, following the Company's policies and procedures. The Audit Committee receives, investigates and responds to all reported concerns taking corrective and preventive measures where necessary. The Company also protects those who report concerns in good faith from retaliation of any kind. The Code of Ethics and the related procedures and measures apply to all workers, employees, executives, and Senior Management. The Company also encourages contractors, suppliers, associates, consultants, users and other business partners to respect the principles of this Code.

ThPA S.A. has adopted an Anti-Bribery Policy consistent with the United Nations Convention against Corruption and follows a zero-tolerance approach when it comes to matters concerning corruption and bribery. To further reinforce this approach and highlight its commitment to integrity, transparency and morality, the Company follows a holistic approach and has adopted an Anti-Bribery Management System in alignment with ISO 37001:2016 and the Company's operating framework. The Code of ethics as well as the policies and procedures regarding corruption and bribery are available to all ThPA S.A.'s employees.



ThPA S.A. has created an internal whistleblowing procedure in compliance with Directive (EU) 2019/1937, as incorporated into Greek law No. 4990/2022. This procedure appears in a Whistleblowing Manual which is approved by the Board of Directors. The Manual provides details on how to receive, evaluate and investigate reports of misconduct or illegal activity and is applicable for various stakeholders (employees, customers, suppliers etc.). The Manual is communicated via email to all ThPA S.A. employees and is available to the public via the Company's web site. Reports may be submitted twenty-four (24) hours a day and seven (7) days a week, via a recorded message to a dedicated telephone number or via the special electronic form on the website of ThPA S.A. in Greek (<https://www.thpa.gr/el/contact/whistleblowing-form/>) or in English (<https://www.thpa.gr/contact/whistleblowing-form/>) or by post to: **Thessaloniki Port Authority S.A.**, to the attention of the Compliance and Risk Management Officer. Reports may also be submitted by physical meeting, upon request of the petitioner in the above mentioned ways,

which will take place within three (3) weeks from the receipt of the request. Such channels ensure confidentiality, anonymity and secure handling of reports. The Company shields whistleblowers from threats or attempts of retribution and ensures those reporting in good faith will suffer no repercussions. Individuals implicated in reports are also protected if no misconduct is found. Accessible Company communication and periodic updates to the Manual by the Compliance and Risk Management Officer keep employees informed about whistleblowing procedures. Staff members that handle reports are trained to handle cases according to confidentiality, non-retaliation and legal compliance principles, while all ThPA S.A.'s workforce received relevant educational material in 2024.

Currently ThPA S.A. has not adopted a dedicated policy for Whistleblowing as there is no regulatory requirement to do so. However, the Company has developed a Whistleblowing Manual outlining procedures for reporting, evaluating and investigating relevant issues as well as measures to safeguard confidentiality and protect whistleblowers from any kind of retribution. This Manual explicitly states the Company's commitment, zero-tolerance stance, and guiding principles for handling reports, fully aligning with the regulatory framework. Additionally, the Company's Code of Ethics includes further relevant provisions.

Beyond the procedures to follow-up on reports by whistleblowers in accordance with the applicable law, ThPA S.A. also has procedures to investigate business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively. As stated in the Company's Code of Ethics, employees can report sus-

pected violations to their superiors, while managers and BoD members shall report directly to the Audit Committee. Reports can be submitted anonymously and the Audit Committee is responsible for reviewing all reported cases. After the conduction of investigations, corrective or suppressive actions are taken depending on the case. It is also worth mentioning that according to ThPA S.A.'s Summary of Internal Regulation, Regulatory Compliance and Risk Management Officer reports to the Audit Committee and guarantees the effective implementation of relevant regulations, policies and procedures.

Animal welfare policies are not applicable or relevant to the Company's operations, as the nature of its activities does not involve or impact animals in any capacity.

Currently, the Company does not have a dedicated policy for training on business conduct. However, all employees have access to a mandatory induction training that includes relevant aspects of ethical behavior and corporate values. This induction serves as a foundational introduction to the Company's principles and expectations. Looking ahead, ThPA S.A. recognizes the importance of continuous education in this area and has prospects to develop a dedicated policy for training on business conduct. This future initiative aims to ensure broader coverage, with a clear structure regarding target audience, frequency and depth of content, supporting a strong ethical culture within the organization.

ThPA S.A. recognizes the important task of identifying specific functions that are most at risk in relation to corruption and bribery. In order to strengthen its commitment to transparency and ethical business practices, ThPA S.A. will conduct an assessment to identify these areas within the next reporting cycles. This assessment will align with best practices, considering factors such as the nature of the Company's activities, level of external interactions, decision making authority, and exposure to financial transactions. While a formal evaluation of high-risk functions has not yet been conducted, ThPA S.A. maintains a general oversight of potential risks and ensures that its compliance framework remains robust. Even though this process is yet to be completed, ThPA S.A. is fully committed to enhancing its compliance framework.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.



GI-2 Management of Relationships with Suppliers

Regarding the Company's policies to prevent late payments as it is stated in ThPA S.A.'s Procurement Regulation, which is publicly available in its website and in its supplier spectrum are included Small and Medium Enterprises (SMEs) as well:

"The Company requires all supplier invoices to be submitted electronically (via email) to the billing address specified in the respective Purchase Order or contract for proper processing. In any other case, the recipient of the invoice shall immediately forward it to the Company's Accounting Department. Invoices sent, or emailed, to any other email address other than the aforementioned address may incur significant delays in payment. **In order to ensure prompt and timely payment and reduce the risk of invoice rejections**, all invoices shall contain at least the following elements legibly printed on the invoice:

- Supplier information (e.g. name, address, Tax / VAT number, etc.)
- Invoice number
- Invoice date
- Purchase Order number (based on which the invoice was issued)
- Procurement specifications (description of goods, works & services, quantity, prices, etc.)
- Invoice amount

It should be noted that all invoices should mirror the respective Purchase Order. A relevant provision should exist in each contract or any other contractual document which is signed by the contractor, while the Procurement & Investments Division is responsible for ensuring compliance with this term. The issuance date of the invoices should not precede the dispatch of the corresponding Purchase Order to the supplier and the starting date of the contract, if any. For invoices, not conforming to the clauses listed above, the Company reserves the right to return the respective invoice back to the supplier with a proper, written justification. In this case, the provided invoice is invalid and has to be replaced by a corrected invoice.

ThPA S.A. also prioritizes environmental management, health and safety and social responsibility in supplier evaluation, reflecting its commitment to sustainability. These criteria may relate to the supplied goods, works, or services, or may address broader sustainability goals. The Company values suppliers associated with corporate social responsibility and green procurement initiatives.

To enhance risk management and supplier performance, ThPA S.A. is actively developing an updated Supplier Master database, aligned with international market standards. This database allows for the systematic assessment and rating of suppliers, contributing to more effective supplier evaluation and vendor management.

Through these measures, ThPA S.A. ensures its supply chain supports its operational needs while addressing sustainability risks and impacts.

ThPA S.A. considers social and environmental criteria in its supplier selection process as outlined in its Procurement Policy. Supplier evaluations may include factors like environmental management, health and safety, social responsibility and green procurement initiatives, even if these are not directly related to the supplied goods, works, or services. Additionally, ThPA S.A. is enhancing its supplier database to align with international standards, enabling more effective evaluation and rating of suppliers, with a focus on vendor management and corporate social responsibility.

For further information regarding Policies please refer to section MDR-P – Policies adopted to manage material sustainability matters.

GI-3 Prevention and Detection of Corruption and Bribery

ThPA S.A. has procedures in place to prevent, detect, and address allegations or incidents of corruption and bribery. These procedures are described in its Whistleblowing Manual and Code of Ethics. ThPA S.A. promotes ethical behavior and encourages stakeholders to report suspected incidents. Reports can be submitted 24/7 by recorded messages, an online form, by post, or in person and thus corruption or bribery related incidents can be detected. The Compliance and Risk Management Officer serves as the Receiving and Monitoring Officer, ensuring the necessary confidentiality and accessibility for all submissions. When addressing allegations, ThPA S.A. follows a structured process. Reports are acknowledged within seven days and the Compliance and Risk Management Officer, in collaboration with the Head of Legal Services, assesses within 15 days whether they fall under the Manual's scope. If they do, a Whistleblowing Committee is formed to review the case thoroughly within three weeks. Where necessary, corrective and suppressive actions are undertaken to resolve the issue effectively. These procedures demonstrate ThPA S.A.'s commitment to transparency, integrity, and ethical business practices.

The investigators are not entirely separate from the chain of management involved in the matter, as one of the investigators is typically from the department that received the call to provide relevant details, and this role is usually undertaken by the respective Director.

Regarding the process, if any, to report outcomes to the administrative, management and supervisory bodies, it is stated in the Whistleblowing Manual's Chapter 5: Following up on reports: "The Committee presents its decision to the Executive Chairman of the Board of Directors to decide on further actions to be taken by him or by the competent body in accordance with the BoD Resolution regarding the delegation of responsibilities to the highest executive bodies of the Company."



Policies are clearly communicated to those for whom they are relevant and ThPA S.A. ensures that the policies are accessible and that they understand its implications. The Code of Ethics and the Whistleblowing Manual are both publicly available for all interested parties in ThPA S.A.'s Company website. Specifically, the Whistleblowing Manual, is also communicated via email to all employees. The availability of said policies and procedures is clearly communicated to all employees by the Company since day one.

So far, ThPA S.A. does not offer training programs dedicated to anti-corruption and anti-bribery. Therefore, currently, there is no available percentage of functions-at-risk covered by training programs. Nevertheless, as the Company is fully committed to transparency and integrity, its personnel has already received via email from the Regulatory Compliance & Risk Management Officer relevant training material as well as the Whistleblowing Manual. ThPA S.A. is planning to offer robust anti-corruption and anti-bribery training programs to all its employees (including members of the administrative, management and supervisory bodies) within 2025.

Metrics and Targets

GI-4 Incidents of Corruption or Bribery

ThPA S.A. has not identified any incidents of corruption and bribery and therefore there are no convictions or fines that have been imposed for violation of anti-corruption and anti-bribery laws. As a result, no actions were necessary to address breaches in anti-corruption and anti-bribery procedures and standards. Consequently, further actions or preventive measures were not required. The Company greatly values integrity and transparency and has thus, implemented a zero-tolerance approach regarding corruption and bribery. Additionally, it is equipped with policies and mechanisms to effectively handle such incidents in case they occur.

GI-5 Political Influence and Lobbying Activities

ThPA S.A. engages in lobbying efforts to support its investments and strategic initiatives, focusing on fostering economic growth and sustainable development. These activities include office visits, outreach initiatives and the organization and funding of strategic conferences to promote its goals. The Executive Chairman plays a pivotal role as President of the Hellenic Ports Association (ELIME) and Greece's representative in the European Sea Ports Organization (ESPO), actively advocating for policies that benefit the port and the broader maritime sector.

To this day ThPA S.A. has not received any financial or in-kind political contributions neither directly nor indirectly.

ThPA S.A.'s memberships in various organizations, such as the ECOPORTS network, MedCruise and the Hellenic-American Chamber of Commerce, further demonstrate its commitment to collaboration and sustainability. These efforts align with the port's material impacts: promoting local economic development through investment attraction, innovative solutions, and job creation, as well as enhancing the sustainability of the cruise sector by supporting environmentally responsible tourism and regional development through alignment with national and Mediterranean cruise strategies. Through its lobbying and participation in key organizations, ThPA S.A. fosters partnerships that align with its sustainability goals and benefit its stakeholders.

ThPA S.A. is registered in the EU Transparency Register with REG Number: 893211945319-14.

No members of the administrative, management and supervisory bodies held a comparable position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period.

GI-6 Payment Practices

Average time for invoice payment: 40 days.

Regarding the standard payment terms in number of days, ThPA S.A.'s Procurement Regulation clearly stated the following:

"The standard payment terms for all supplier invoices are 60 days from the date of the invoice. However, for certain exceptional cases the payment terms may vary depending on the nature of the procurement upon approval by the Company's CFO."

The percentage of the Company's payments made within the standard payment terms of 60 days is 23%. For reference, 75% of payments are made in less than 60 days, while 2% are made after 60 days.

The company is in a transition period as it has changed the standard payment term from 30 days to 60 days. This explains the average time for invoice payment, which remains significantly lower than 60 days, as well as the percentage of its payments aligned with the standard payment term. It is worth noting that there are no legal proceedings currently outstanding for late payments, as well as that the metrics included above have not been validated by an external body beyond the assurer.

ThPA S.A. utilizes a robust Enterprise Resource Planning (ERP) system (SAP) to manage its financial operations. The agreed payment terms are established within the system and scheduled for execution on the designated payment date.

Upon delivery and preliminary acceptance of goods or services, the invoice is submitted to the relevant department for verification. Following approval, the department records the delivery in the system. The Accounting Department processes the invoice using the three-way match method, ensuring accuracy and compliance. Payments are then scheduled in accordance with the agreed terms and settled through the designated banking channels.



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APPENDIX

Table of Indicators with the Athens Exchange ESG Index 2024 Data Based on the ATHEX ESG Reporting Guide 2024

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
ENVIRONMENTAL					
C-EI	C-EI-1	Scope 1 emissions - Total amount of direct emissions (Scope 1)	5,948.99	Tons CO ₂ equivalent (tCO ₂ e)	Annual Financial Report 2024 p. 122 Table EI-6 (English Version) – External Verification
C-EI	C-EI-2	Scope 1 emissions - GHG intensity of Scope 1 emissions	59.18	Tons CO ₂ equivalent (tCO ₂ e) / Net revenue in million euros	Calculations were based on the emissions included in the Annual Financial Report 2024 p. 122 Table EI-6 (English Version) – External Verification
C-E2	C-E2-1	Scope 2 emissions - Total amount of indirect emissions (Scope 2) – Location based approach	5,685.08	Tons CO ₂ equivalent (tCO ₂ e)	Annual Financial Report 2024 p. 122 Table EI-6 (English Version) – External Verification
C-E2	C-E2-2	Scope 2 emissions - GHG intensity of Scope 2 emissions – Location based approach	56.56	Tons CO ₂ equivalent (tCO ₂ e) / Net revenue in million euros	Calculations were based on the emissions included in the Annual Financial Report 2024 p. 122 Table EI-6 (English Version) – External Verification
C-E2	C-E2-3	Scope 2 emissions - Total amount of indirect emissions (Scope 2) - Market based approach	0	Tons CO ₂ equivalent (tCO ₂ e)	Annual Financial Report 2024 p. 122 Table EI-6 (English Version) – External Verification
C-E2	C-E2-4	Scope 2 emissions - GHG intensity of Scope 2 emissions - Market based approach	0	Tons CO ₂ equivalent (tCO ₂ e) / Net revenue in million euros	Calculations were based on the emissions included in the Annual Financial Report 2024 p. 122 Table EI-6 (English Version) – External Verification
C-E3	C-E3-1	Energy consumption and production - Total amount of energy consumed within the organization	31,416.624	Megawatt hour (MWh)	ISO 50001:2018 Certificate – External verification/ Annual Financial Report 2024 p. 121 Table EI-5 (English Version)
C-E3	C-E3-2	Energy consumption and production - Percentage of electricity consumed	36.22	Percentage (%)	ISO 50001:2018 Certificate – External verification/ Annual Financial Report 2024 p. 121 Table EI-5 (English Version)

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
ENVIRONMENTAL					
C-E3	C-E3-3	Energy consumption and production - Percentage of renewable energy consumed	36.22	Percentage (%)	ISO 50001:2018 Certificate – External verification/ Annual Financial Report 2024 p. 121 Table EI-5 (English Version)
C-E3	C-E3-4	Energy consumption and production - Total amount of energy produced	0	Megawatt hour (MWh)	No energy production in ThPA S.A. in 2024
C-E3	C-E3-5	Energy consumption and production - Percentage of renewable energy produced	0	Percentage (%)	No renewable energy production in ThPA S.A. in 2024
A-EI	A-EI-1	Scope 3 emissions - Total amount of other indirect emissions (Scope 3)	No – Not disclosed	Tons CO ₂ equivalent (tCO ₂ e)	Scope 3 calculation for 2024 has not been implemented / Annual Financial Report 2024 p. 122 Table EI-6 (English Version)
A-EI	A-EI-2	Scope 3 emissions - GHG intensity of Scope 3 emissions	No – Not disclosed	Tons CO ₂ equivalent (tCO ₂ e) / Net revenue in million euros	Scope 3 calculation for 2024 has not been implemented / Annual Financial Report 2024 p. 122 Table EI-6 (English Version)
A-E2	A-E2-1	Climate change risks and opportunities - Discussion of climate change-related risks and opportunities that can affect business operations	Yes – Disclosed	Discussion and Analysis	Double Materiality Assessment implemented. Reference included in the Annual Financial Report 2024 p. 69-70 (English Version)
A-E3	A-E3-1	Waste management - Total amount of hazardous waste	61.014	Tons	HMA 2024 Data / Annual Financial Report 2024 p. 147 Table E5-5 (English Version)
A-E3	A-E3-2	Waste management - Total amount of non-hazardous waste	5,073.102	Tons	HMA 2024 Data / The calculations were based on the data included in the Annual Financial Report 2024 p. 147 Table E5-5 (English Version)

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
ENVIRONMENTAL					
A-E3	A-E3-3	Waste management - Percentage of waste by type of treatment - Recycled	88.64	Percentage (%)	HMA 2024 Data / The calculations were based on the data included in the Annual Financial Report 2024 p. 147 Table E5-5 (English Version)
A-E3	A-E3-4	Waste management - Percentage of waste by type of treatment - Composted	0	Percentage (%)	HMA 2024 Data / The calculations were based on the data included in the Annual Financial Report 2024 p. 148 Table E5-5 (English Version)
A-E3	A-E3-5	Waste management - Percentage of waste by type of treatment - Incinerated	0	Percentage (%)	HMA 2024 Data / The calculations were based on the data included in the Annual Financial Report 2024 p. 148 Table E5-5 (English Version)
A-E3	A-E3-6	Waste management - Percentage of waste by type of treatment - Landfilled	11.36	Percentage (%)	HMA 2024 Data / The calculations were based on the data included in the Annual Financial Report 2024 p. 148 Table E5-5 (English Version)
A-E3	A-E3-7	Waste management - Total amount of radioactive waste	0	Tons	HMA 2024 Data / The calculations were based on the data included in the Annual Financial Report 2024 p. 148 Table E5-5 (English Version)
A-E4	A-E4-1	Total amount of effluent discharge containing polluting substances	0	Cubic meters (m ³)	No effluent discharges containing polluting substances occur in ThPA S.A.
A-E5	A-E5-1	Biodiversity sensitive areas - Description of the impact of business operations on biodiversity sensitive areas	56.56	Discussion and Analysis	Sustainability Policy
A-E6	A-E6-1	Climate change policy	Yes - Relevant clauses disclosed in other policy	Discussion and Analysis	Sustainability Policy/ Environmental Policy

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
ENVIRONMENTAL					
A-E7	A-E7-1	Removals and carbon credits - GHG removals and storage	0	Tons CO ₂ equivalent (tCO ₂ e)	No GHG removals and storage in 2024
A-E7	A-E7-2	Removals and carbon credits - Carbon credits	0	Tons CO ₂ equivalent (tCO ₂ e)	No carbon credits in 2024
A-E8	A-E8-1	Total GHG emissions - Total GHG emissions location based	No - Not Disclosed	Tons CO ₂ equivalent (tCO ₂ e)	For the calculation of the Total GHG emissions, calculation of Scope 3 emissions is required
A-E8	A-E8-2	Total GHG emissions - Total GHG emissions market based	No - Not Disclosed	Tons CO ₂ equivalent (tCO ₂ e)	For the calculation of the Total GHG emissions, calculation of Scope 3 emissions is required
SS-E1	SS-E1-1	Transition plan - Disclosure of transition plan for climate change mitigation	No - Not Disclosed	Discussion and Analysis	No transition plan conducted in 2024 / Annual financial Report 2024 p. 116 (English Version)
SS-E2	SS-E2-1	Air pollutant emissions - Total amount of NOx (excluding N2O)	No - Not Disclosed	Kilograms (kg)	Ambient SOx monitoring is being implemented continuously by Air Quality monitoring Station. No SOx source allocation is possible.
SS-E2	SS-E2-2	Air pollutant emissions - Total amount of Sox	No - Not Disclosed	Kilograms (kg)	Ambient SOx monitoring is being implemented continuously by Air Quality monitoring Station. No SOx source allocation is possible.
SS-E2	SS-E2-3	Air pollutant emissions - Total amount of Volatile organic compounds (VOCs)	No - Not Disclosed	Kilograms (kg)	Ambient VOCs monitoring is being implemented weekly by Air Quality monitoring Station. No VOCs source allocation is possible.
SS-E2	SS-E2-4	Air pollutant emissions - Total amount of Particulate matter (PM)	No - Not Disclosed	Kilograms (kg)	Ambient PM monitoring is being implemented continuously by Air Quality monitoring Station. No PM source allocation is possible.

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
SOCIAL					
C-S1	C-S1-1	Stakeholder engagement - Discussion of organization's main stakeholders and analysis of key stakeholder engagement practice	Yes – Disclosed	Discussion and Analysis	New materiality analysis and evaluation have been performed according to international standards. Stakeholder engagement to gather feedback on material topics
C-S2	C-S2-1	Percentage of female employees	15.23	Percentage (%)	HR Division Data 2024
C-S3	C-S3-1	Percentage of women at top management level	23.53	Percentage (%)	HR Division Data 2024
C-S4	C-S4-1	Employee turnover - Percentage of full-time employee voluntary turnover	2.23	Percentage (%)	HR Division Data 2024
C-S4	C-S4-2	Employee turnover - Percentage of full-time employee involuntary turnover	0	Percentage (%)	HR Division Data 2024
C-S4	C-S4-3	Employee turnover - Total employee turnover	2.23	Percentage (%)	HR Division Data 2024
C-S5	C-S5-1	Employee training - Average training hours of employees at top management level	5.471	Number of hours	HR Division Data 2024

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
SOCIAL					
C-S5	C-S5-2	Employee training - Average training hours of the rest employee categories	15.59	Number of hours	HR Division Data 2024
C-S5	C-S5-3	Employee training - Average training hours - Women	7.84	Number of hours	HR Division Data 2024
C-S5	C-S5-4	Employee training - Average training hours - Men	16.62	Number of hours	HR Division Data 2024
C-S6	C-S6-1	Human rights policy - Description of human rights policy and fundamental principles	Yes - Policy in place	Discussion and Analysis	Code of Ethics / Diversity Policy
C-S7	C-S7-1	Percentage of employees covered by collective bargaining agreements	96.95	Percentage (%)	HR Division Data 2024
C-S8	C-S8-1	Value chain - Discussion of supplier screening using ESG criteria	Yes – Disclosed	Discussion and Analysis	Procurement Regulation
C-S8	C-S8-2	Value chain - Policies to manage material impacts, risks and opportunities related to workers in the value chain	Yes - Policy in place	Discussion and Analysis	Procurement Regulation

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
SOCIAL					
A-S1	A-S1-1	Sustainable economic activity - Percentage of sustainable turnover - Alignment	54.15	Percentage (%)	Annual Financial Report 2024/ Turnover of environmentally sustainable activities (Taxonomy aligned) (A.1) p. 132 (English Version)
A-S1	A-S1-2	Sustainable economic activity - Percentage of sustainable CapEx - Alignment	16.08	Percentage (%)	Annual Financial Report 2024/ CapEx of environmentally sustainable activities (Taxonomy aligned) (A.1) p. 135 (English Version)
A-S1	A-S1-3	Sustainable economic activity - Percentage of sustainable OpEx - Alignment	59.69	Percentage (%)	Annual Financial Report 2024/ OpEx of environmentally sustainable activities (Taxonomy aligned) (A.1) p. 138 (English Version)
A-S1	A-S1-4	Sustainable economic activity - Percentage of sustainable turnover - Eligibility	55.74	Percentage (%)	Annual Financial Report 2024/ A. Turnover of Taxonomy eligible activities (A.1+A.2) p. 132 (English Version)
A-S1	A-S1-5	Sustainable economic activity - Percentage of sustainable CapEx - Eligibility	33.3	Percentage (%)	Annual Financial Report 2024/ A. CapEx of Taxonomy eligible activities (A.1+A.2) p. 135 (English Version)
A-S1	A-S1-6	Sustainable economic activity - Percentage of sustainable OpEx - Eligibility	67.02	Percentage (%)	Annual Financial Report 2024/ A. OpEx of Taxonomy eligible activities (A.1+A.2) p. 138 (English Version)
A-S2	A-S2-1	Total amount of monetary expenditure on employee training	96,691.00	Euros (€)	HR Division Data 2024

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
SOCIAL					
A-S3	A-S3-1	Percentage of difference between male and female earnings	171	Percentage (%)	HR Division Data 2024
A-S4	A-S4-1	CEO pay ratio - Total CEO pay	279,451.23	Euros (€)	HR Division Data 2024
A-S4	A-S4-2	CEO pay ratio - Ratio of CEO to median employee earnings	7.92	Ratio	HR Division Data 2024 / Remuneration Report 2024
SS-S4	SS-S4-1	Total amount of monetary losses as a result of labour law violations	0	Euros (€)	Annual Financial Report 2024
SS-S8	SS-S4-2	Customer satisfaction - Disclosure of customer satisfaction survey results	No – Results for 2024 not Disclosed yet	Discussion and Analysis	Annual Financial Report 2024 p. 183 (English Version)
SS-S9	SS-S4-3	Customer grievance mechanism - Description of key operations and procedures of Customer Grievance Mechanism	Yes – Disclosed	Discussion and Analysis	Annual financial Report 2024 p. 184 (English Version)

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
GOVERNANCE					
C-G1	C-G1-1	Board composition - ESG related qualifications of the board members	Yes – Disclosed	Discussion and Analysis	ThPA S.A. website – Board of Directors / BoD Secretariat Data 2024
C-G1	C-G1-2	Board composition - Classification of the Chairman of the Board	Executive	Discussion and Analysis	ThPA S.A. website – Board of Directors / Annual Financial Report 2024 / BoD Secretariat Data 2024
C-G1	C-G1-3	Board composition - Percentage of female board members	30	Number	ThPA S.A. website – Board of Directors / BoD Secretariat Data 2024
C-G1	C-G1-4	Board composition - Percentage of non-executive board members	50	Percentage (%)	ThPA S.A. website – Board of Directors / Annual Financial Report 2024 / BoD Secretariat Data 2024
C-G1	C-G1-5	Board composition - Percentage of independent non-executive board members	30	Percentage (%)	ThPA S.A. website – Board of Directors / Annual Financial Report 2024 / BoD Secretariat Data 2024
C-G1	C-G1-6	Board composition - Number of board members	10	Number	BoD Secretariat Data 2024
C-G1	C-G1-7	Board composition - Average age of board members	51.2	Number	BoD Secretariat Data 2024
C-G1	C-G1-8	Board composition - Average tenure of board members	2.5	Number	BoD Secretariat Data 2024

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
GOVERNANCE					
C-G2	C-G2-1	Sustainability oversight - Description of approach to sustainability oversight	Yes – Disclosed	Discussion and Analysis	Sustainability Policy
C-G3	C-G3-1	Materiality - Description of the materiality assessment process and material topics	Yes – Disclosed	Discussion and Analysis	Annual Financial Report 2024 p. 82-86 (English Version)
C-G3	C-G3-2	Materiality - Approach	Double Materiality	Discussion and Analysis	Annual Financial Report 2024 p. 82-86 (English Version)
C-G4	C-G4-1	Sustainability policy - Description of sustainability policy and fundamental principles	Yes - Policy in place	Discussion and Analysis	Sustainability Policy
C-G5	C-G5-1	Business ethics policy - Description of business ethics policy and fundamental principles	Yes - Policy in place	Discussion and Analysis	Code of Ethics
C-G6	C-G6-1	Data security policy - Description of data security policy and fundamental principles	Yes - Policy in place	Discussion and Analysis	Information Security Policy
C-G7	C-G7-1	Sustainability reporting - Basis for preparation of sustainability reporting	Yes – Disclosed	Discussion and Analysis	Included in the Annual Financial Report 2024 p. 24-26 (English Version)
C-G7	C-G7-2	Sustainability reporting - List all its entities included in the sustainability reporting	Yes – Disclosed	Discussion and Analysis	Annual Financial Report 2024 p. 24-25 (English Version)

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
GOVERNANCE					
C-G8	C-G8-1	Annual financial statements - Date of publication	15/4/2025	Date	Annual Financial Report 2024
A-G1	A-G1-1	Strategy, business model and value chain - Discussion of strategy, business model and value chain	Yes - Disclosed	Discussion and Analysis	Annual Financial Report 2024 p. 42-46 (English Version)
A-G1	A-G1-2	Strategy, business model and value chain - Activity in fossil fuel sector, chemical production, controversial weapons, cultivation and production of tobacco	Yes - Disclosed	Discussion and Analysis	ThPA S.A. has no activity in these sectors. / Annual Financial Report 2024 p. 46 (English Version)
A-G2	A-G2-1	Business ethics violations - Total amount of monetary losses as a result of business ethics violations	0	Euros (€)	Annual Financial Report 2024
A-G2	A-G2-2	Business ethics violations - Total number of business ethics violations	0	Number	Annual Financial Report 2024

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
GOVERNANCE					
A-G3	A-G3-1	ESG targets - Short-term targets associated with strategic ESG objectives	No - Not disclosed	Discussion and Analysis	<p>No short-term ESG targets have been set by ThPA S.A. Below are the pages from the Sustainability Report 2024 (English version) where it is stated that ThPA S.A. has not set specific targets.</p> <ul style="list-style-type: none"> • E1-4 - Targets related to climate change mitigation and adaptation: p. 120 • E3-3 - Targets related to water and marine resources: p. 143 • E5-3 - Targets related to resource use and circular economy: p. 146 • S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities: p.162 • S3-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities: p.179 • S4-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities: p.189

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
GOVERNANCE					
A-G3	A-G3-2	ESG targets - Medium-term targets associated with strategic ESG objectives	No – Not disclosed	Discussion and Analysis	<p>No short-term ESG targets have been set by ThPA S.A. Below are the pages from the Sustainability Report 2024 (English version) where it is stated that ThPA S.A. has not set specific targets.</p> <ul style="list-style-type: none"> E1-4 - Targets related to climate change mitigation and adaptation: p. 120 E3-3 – Targets related to water and marine resources: p. 143 E5-3 – Targets related to resource use and circular economy: p. 146 S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities: p.162 S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities: p.179 S4-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities: p.189
A-G3	A-G3-3	ESG targets - Long-term targets associated with strategic ESG objectives	Yes – Disclosed	Discussion and Analysis	ThPA S.A. Sustainability Report 2023 p. 38

2024 ID	2024 SUB-ID	Metric	Value	Unit	Reference
GOVERNANCE					
A-G4	A-G4-1	Percentage of CEO's variable pay	14.63	Percentage (%)	HR Division Data 2024
A-G5	A-G5-1	External assurance - Discussion of external assurance on reported ESG information – Scope of information covered	Yes - Certain metrics have been externally assured	Discussion and Analysis	ISO 14064-1:2018, ISO 50001:2018, ISO 14001: 2015, ISO45000, HMA 2024 Data
A-G5	A-G5-2	External assurance - Discussion of external assurance on reported ESG information - Level of assurance	Limited assurance	Discussion and Analysis	Annual Financial Report 2024 p. 238-249 (English Version)
A-G6	A-G6-1	ESG Bonds	0	Million Euros (€)	Annual Financial Report 2024
A-G7	A-G7-1	Integration of sustainability-related performance in incentive schemes - Incentive schemes and remuneration policies linked to sustainability matters	No –Not disclosed	Discussion and Analysis	Remuneration Policy
SS-G1	SS-G1-1	Whistleblower policy - Description of whistleblower policies and procedures	Yes - Procedure in place	Discussion and Analysis	Whistleblowing Procedure
SS-G2	SS-G2-1	Critical risk management - Description of systems, processes and mechanisms to identify and mitigate critical risks	Yes – Disclosed	Discussion and Analysis	Compliance and Risk Management Officer

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