



ThPA S.A.

Sustainability Policy

Policy Structure & Contents

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1. Sustainability Policy Statement

In accordance with the ThPA S.A. (hereinafter the "Company" or "ThPA S.A.") mission statement, the Company promotes sustainable growth by providing services in line with sustainable development principles, especially in the communities in which it operates. This Policy (hereinafter "Sustainability Policy") covers the full spectrum of sustainability, as defined by ThPA S.A., including environmental, social and governance (ESG) criteria. The Company recognizes that sustainability is among its top priorities. Through the Sustainability Policy, the Company aims to improve the transparency and accountability of its operational activities and outlines its commitments for the creation of sustainable added value.

2. Purpose

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:

- Creating Sustainable Value
- Environment
- Society
- Governance

These pillars constitute the framework for all actions and initiatives related to ESG implementation throughout the Company. To support this effort, we are committed to adopting responsible practices, introducing due diligence mechanisms, making commitments and setting targets and Key Performance Indicators (KPIs).

3. Scope of Application

This policy applies to the entire Company and takes into account relevant national and international legislation. This implies that ThPA S.A. is committed to complying with applicable laws and regulations and ensuring that its policies are consistent with relevant requirements. It is important for ThPA S.A. to have clear policies, which reflect its commitment to adopt legitimate and ethical business practices and to implement these practices.

The Company's Sustainability Policy is in line with the requirements of the effective legislative and regulatory framework, and in particular with the following legislations that promote the core principles of sustainable development:

- Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU on the disclosure of non-financial and diversity information by certain large companies and groups,
- Law 4403/2016, which adapts the Greek legislation to the provisions of Articles 19, 20, 29, 30, 33, 35, 40 to 46 of Directive 2013/34/EU and to the provisions of Directive 2014/95/EU,
- Section 7 "Report (Statement) of Non-financial Information" of the circular 62784/2017 of the Ministry of Economy and Development.
- Law 4548/2018 on the Reform of the Law on Sociétés Anonymes,

- Law 4706/2020 on Corporate Governance of Sociétés Anonymes,

Additionally, the Company, in the context of drawing up and implementing this Sustainability 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), adopted in September 2015 by the 193 UN member states,
- The ATHEX ESG Reporting Guide 2022,

ThPA S.A.'s Sustainability Policy:

- Applies to all persons working for and/or on behalf of ThPA S.A., including employees at all levels, BoD members, directors, senior executives, officers, interns, contractors and all persons employed by ThPA S.A. either through employment agreements or any other sort of contractual relationship.
- Is communicated to all third parties providing services to the Company (supply chain) or on its behalf (including partners and suppliers, intermediaries, and any other persons with whom the Company operates under outsourcing or other agreements).
- Covers all Company activities in Greece, including all operations carried out by the Company or a third party acting on behalf of or in collaboration with the Company.

4. Stakeholder Groups

ThPA S.A. is dedicated to implementing a strategy that generates added value for all its stakeholders. The Company acknowledges the interests and expectations of its stakeholders and strives to facilitate continuous communication through various channels to comprehend, evaluate and address issues of material importance to them. Addressing stakeholder concerns and expectations enhances the Company's long-term performance and contributes to the overall success of its business. In addition, ThPA S.A. participates in national and international initiatives focused on sustainable development to fulfill its commitment to sustainable development issues.

Key stakeholder groups include:

- ✓ Employees
- ✓ Shareholders and Investors
- ✓ Customers, Shipping and Terminal Operators
- ✓ Port Community
- ✓ Media
- ✓ Suppliers, Contractors and Strategic Partners
- ✓ Passengers
- ✓ Financial Institutions and Creditors
- ✓ Regulatory bodies, Ministries and Port Authorities
- ✓ Maritime Sector Associations
- ✓ NGOs and Civil Society
- ✓ Research Institutions and Academia
- ✓ Ports and Terminals

5. Strategic Pillars, Commitments & Practices

1. Environment, Climate and Energy

1. Energy Efficiency, Climate Change and Air Quality

Our Commitment

We focus on energy efficiency and air quality, constantly trying to monitor and reduce GHG emissions, with emerge both directly from fossil fuel consumption and indirectly from electricity generation.

ThPA S.A. recognizes the increasing impact of Climate Change in its operations. To this end, the Company strives to reduce its overall impact by deploying environmental monitoring mechanisms and energy consumption initiatives and reducing carbon emissions across its activities. At the same time, the Company uses its established Environmental and Energy Management Systems to:

- Meet the requirements of the ISO 14001 and ISO 50001 standards
- Replace sources of higher energy consumption
- Adopt measures for port related operations and in buildings
- Upgrade heating equipment
- Employ recurrent trainings for the proper use of machinery and vehicles

Overall, it is extremely important to emphasize the significance of energy efficiency, climate change, and air quality both inside and outside the Company's premises. This is crucial because it promotes the proper implementation of sustainability practices to safeguard the environment, and it also aligns with the broader objectives established by global institutions like the United Nations. Therefore, ThPA S.A. remains committed to safeguarding such goals and ensuring their adoption across its value chain.

2. Efficient Management of Water Resources and Ecosystem Protection

Our Commitment

We are committed to protecting the marine ecosystem and biodiversity and managing efficiently water resources ensuring positive environmental impact and contributing to the marine natural resources' preservation.

We implement various measures to monitor, control and ultimately reduce water consumption, both in office buildings, warehouses, dockworker restrooms and showers, and for vessel supply. Again, the Environmental Management System ensures that the aforementioned resources are treated with care. Overall, we reduce water consumption and monitor sea water quality in collaboration with external researchers. All the above ensures that water is used in a sensible manner, thus ensuring that the principles of sustainable water use are preserved.

3. Waste Management

Our Commitment

We are committed to effectively managing the waste resulting from our operations by monitoring and controlling operational waste, promoting recycling activities and ensuring proper treatment and disposal.

ThPA S.A. employs waste management controls to reduce, reuse and recycle waste coming from its operations. Through the approved Waste Management Plan, the Company adheres to the relevant regulatory requirements and manages the type and quantity of waste produced by port operations. The Company also collects and transports non-hazardous solid waste from land-based facilities to storage, treatment or landfill facilities. Overall, we have established mechanisms to monitor the types

of waste that derive from our operations. Specifically, the Digital Waste Registry helps us keep track of waste and ensure that all recycling opportunities are leveraged. Furthermore, ThPA S.A. is aware of risks related to potential spills that might occur within the port and has established trainings and incident-response mechanisms to mitigate them. We have invested in waste management as we consider it a key pillar of sustainability, given its direct impact to the environment as well as to society and the economy.

2. Social Engagement

1. Employee Development and Talent Management

Our Commitment

We provide ongoing training and development programs to all our employees to help them enhance both personal and professional skills, while maintaining a fair and diverse culture at all levels of the Organization, promoting equal opportunities and respecting human rights.

At ThPA S.A., we place special emphasis on empowering its employees and developing a working environment that promotes equality, inspiration, a sense of community and personal and professional growth. We understand that in order to effectively handle the difficulties of daily operations and generate added value across the value chain, we need to make sure that our people are well-equipped. For this reason, our Company strives to attract and retain talented employees, who will form the basis of our growth. We make sure that all necessary toolkits for the development of employees are available. Our employees enjoy a wide range of growth opportunities which go hand in hand with our corporate goals. We integrate a number of trainings to improve the hard skills of employees, such as technical expertise, while also try to enhance their soft skills, via trainings on how to deal with emergency situations, which are also co-conducted with certified trainers and organizations. We consider our employees' growth a vital part of the Company's course to growth, as well as a significant aspect of sustainable development.

2. Equity, Diversity and Inclusion

ThPA S.A. continuously pursues a framework of equal opportunities, diversity and inclusion in its operations. We aspire to support the development and evolution of our people while upholding their rights and valuing their individuality. For this reason, we have created a Diversity Policy and stringent anti-discrimination guidelines to guarantee that everyone is respected and valued. ThPA S.A. always values people not by ethnic, religious or gender criteria, but by their intrinsic value as human beings. Our goal is to promote our people's growth and ensure that the principles of dignity and respect are applied across our organization equally, thus ensuring that dignity and respect to one's person are appreciated. Therefore, ThPA S.A. acts in line with the human rights framework developed by international organizations and the United Nations.

3. Health, Safety and Employee Wellbeing

Our Commitment

We continuously work to maintain a safe working environment, with employee health and safety being our top priority. We also focus on promoting employee well-being by offering benefits that will enable us to achieve that goal.

ThPA S.A. acknowledges the importance of Health and Safety and is committed to maintaining a safe working environment for all its employees. The inadequate management of potential incidents may have adverse effects on employee health, disrupt the work-life balance, as well as on the Company's operational activities. We are committed to applying all necessary measures to protect our employees and eliminate potential risks, as well as ensure a safe and prosperous work environment. The

Company applies both a Health and Safety management System and an Occupational Health and Safety Policy, through which there are strict criteria for the protection and security of employees. It is the utmost goal of ThPA S.A. to create a surplus of wellbeing in the workplace, via which employees will be able to work efficiently and without hassle. Thus, it is imperative to keep ensuring such a hassle-free workplace where all measures for health and safety are guaranteed.

4. City-Port Integration

Our Commitment

We strengthen relationships, generate added value and create jobs in the regions and communities where we operate. We also strongly support local businesses, forge links with local suppliers and increase our overall socio-economic impact.

ThPA S.A. highly values its long-lasting, active and strong relationship with the city of Thessaloniki. The Port of Thessaloniki is located within the city and thus, our Company's sustainable development plays a key role for the city's sustainable development. This practically means that ThPA S.A. must promote sustainability at a corporate level and encourage the city's environmental, cultural and economic growth. Therefore, the Company 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. Overall, city-port integration is a critical issue for the Company, as it is key to delivering added value to the economy and society.

3. Business Ethics and Value Creation

1. Corporate Governance and Business Ethics

Our Commitment

We promote business ethics, anti-corruption and anti-competitive behavior through the establishment of a strong corporate governance structure and the promotion of transparency and accountability.

Our Company understands the impact a well-organized corporate governance structure can have on sustainable development. ThPA S.A. has a Code of Ethics in place, which emphasizes the principles of integrity and transparency. In turn, these principles are directly linked to sustainable development. The Code states that the means of achieving results are equally important to the results themselves and that the Company conducts its business with integrity, by taking ethics and regulatory compliance seriously. ThPA S.A. operates within an effective corporate governance framework and establishes a comprehensive system of procedures and controls. Through the Code of Ethics, all employees and partners are encouraged to act in accordance with the beliefs, values and ethics associated with the Company's culture. Overall, corporate governance ensures that the core values of transparency and integrity apply throughout the Company.

2. Stakeholder Engagement and Client Building

Our Commitment

We enhance communication and active engagement with key stakeholders, developing a sustainable way of thinking across our value chain and strengthening our client relationships through extensive research and targeted actions.

For ThPA S.A. the definition of stakeholders includes all the groups influenced by our activities or influencing our activities and decision-making process. We are committed to all our stakeholders and involve them in the identification and management of sustainability topics and concerns in order to enhance our performance in this front. By engaging with our stakeholders, we meet our ambitions of improving transparency, building trust and dealing with emerging challenges and opportunities. We

must note that each stakeholder group has a value of its own, in terms of communication, opportunities for dialogue and feedback. This means that each stakeholder has a vital role to play in the context of ThPA S.A.'s efforts to promote sustainability.

3. Economic Growth and Business Expansion

Our Commitment

We integrate ESG principles throughout our business. Our investments take into account sustainability and climate-related criteria, aiming to improve our performance and leverage opportunities for growth and expansion, while respecting the mandate for a “green” future.

ThPA S.A. supports its economic growth by adopting sustainability principles along its procedures and investments. 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.

4. Crisis, Reputation and Risk Management

Our Commitment

We implement the appropriate risk management procedures to ensure business continuity and we respond to threats and emergencies through a comprehensive emergency preparedness plan.

Our Company understands the value of managing risks and retaining a solid reputation. Thus, we have enacted a series of procedures to manage and mitigate risks. The Risk Management procedure is conducted in order to identify, analyze, prioritize, treat, monitor and report the main risks associated with the Company's activities. The Internal Control System of the Company sets out all the internal control mechanisms and procedures related to risk management, internal audit and regulatory compliance, which cover every activity of the Company and contribute to its safe and effective operation. Overall, the Company's monitoring and risk management procedures ensure our uninterrupted operations, business continuity and good reputation.

4. Smart and Digital Port

1. Accessibility and Security

Our Commitment

We promote maritime safety and security, developing measures to safeguard our port from any unlawful activities, improving our infrastructure and inspecting the transferred cargo.

ThPA S.A. as a port-managing organization is attentive towards the accessibility and security of its spaces. A large number of people and ships pass through the spaces of the port every day; ThPA S.A. uses a Security Policy that guarantees a safe working environment and takes active measures to prevent illegal activities against people, ships, vehicles, buildings, goods, loading and unloading equipment and supplies, in order to maintain safety and security. Through internal navigation channels and access points, the major objective is to monitor all the port areas and ensure that port premises remain secure. In fact, we also aim to prevent any security-related incidents that may damage the port and remain vigilant to the types of risk that might emerge from our activities. Overall, we understand the importance of security for our value chain and our presence in the market and we remain committed to safeguard it.

2. Digitization and Automation

Our Commitment

We optimize our operations, processes and infrastructure through the automation and digitization of the port systems to provide innovative high-end services and create value for the wider port community.

ThPA S.A. has enacted a novel smart-port approach to ensure the optimization of the port's operations. This includes the adoption of automation technologies, digitized systems and innovative high-end services to create surplus value for the Company and the port community. These endeavors have the aim of positioning the port as an engaging location and an attractive employer that promotes innovation within its value chain. The smart approach is also fundamental to sustainability, as digitized services increase accessibility, ensure the protection of resources and the monitoring of sensitive processes, while nudging the wider port community towards innovative tolls and techniques that can reduce the overall environmental impact.

3. Quality, Innovation and Sustainable Service Design

Our Commitment

We are committed to designing and promoting services that incorporate ESG criteria to meet our customers' expectations and implement innovative low-carbon solutions.

ThPA S.A.'s Quality Management System aims to meet the needs, requirements and expectations of our customers in the areas of mooring of commercial vessels, passenger vessels and cruise ships, loading and unloading of containers, bulk cargo and general cargo, storage and transport of cargo, and concession of sites for commercial and cultural activities. We aim to provide to our customers services of the highest quality, while continuously improving our operations. ThPA S.A. is committed to enhancing its services, ensuring safety of operations and maximizing efficiency, productivity and service quality for its customers and partners. To contribute to the economic growth of the Thessaloniki and the broader region, ThPA S.A. implements initiatives to support the local economy and community, create new jobs and opportunities and enhance the overall social product.

6. Sustainability Policy Implementation, Monitoring & Modification

The Sustainability Committee reports to the Executive Chairman of the Board of Directors for monitoring the Sustainability Policy implementation. The Sustainability Team under the leadership of the Director of Sustainability and Environmental Strategy is responsible for monitoring the principles and practices of this Policy, in the context of ThPA S.A. daily operations. The Sustainability Team prepares information reports on the Sustainability Policy implementation for the Executive Chairman of the Board of Directors on an annual basis.

The rules, commitments and principles described in the Company's Code of Ethics & Conduct, Diversity Policy, Remuneration Policy, Conflicts of Interest Policy, Board Member Eligibility Policy, Security Policy, Privacy Policy, Data Protection Policy, Quality Policy, Business Continuity Policy, Information Security Policy and any other relevant Policies or Codes adopted and implemented by ThPA S.A., remain in force, and are applied in parallel with this Policy.

The Sustainability Policy was approved by the ThPA SA Executive Committee on 30/05/2023 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 SA Executive Committee.

The Sustainability Policy is available in the Company's internal network (in a digital and physical format). and on the Company's corporate website.

7. Contact Point

For any questions or information on the policy outlined in this document, please contact:

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8. Sustainability Policy – Version History

Version	Date	Edited by	Description	Approved by
1.0	30\05\2023	Sustainability Committee	First version	Ex.Co