

Human Resources &
Organization
Division

Human Resources Administration
Department

General Counsel –
Legal Affairs &
Corporate Governance
Division

Compliance Department



Human Rights Policy

BoD Decision 54/06.06.2022



INTRODUCTION

PPC S.A. is undeniably an innovative company, job and prosperity creator, a leader in business practice and excellence. As a consequence, it places high on its list of key priorities the respect for human rights, the respect for its employees and for all parties involved in its business.

The Company seeks to protect and promote respect for human rights within its sphere of influence. It supports and encourages best practices in human rights, as well as security and protection of its stakeholders.

PURPOSE OF THE POLICY

The present Policy establishes a framework for promoting respect for and protection of Human Rights, both within the Company's internal environment and its sphere of influence.

This Policy expresses PPC SA's intention not to tolerate the violation of Human Rights, both by preventing such violations by the persons falling within the scope of this Policy and avoiding transactions with third parties involved in proven (at least upon issuance of first instance judgement) human rights violations.

In addition, the purpose of the Policy is to enhance the awareness of employees and all stakeholders with regard to the respect and protection of Human Rights in all areas of the Company's Business, including its subsidiaries.

SOURCES OF HUMAN RIGHTS PROTECTION

The following internationally recognised Standards, Regulations, Principles and Guidelines have been taken into account in the preparation of this Policy:

1. The International Bill of Human Rights
2. The UN Guiding Principles on Business and Human Rights.



3. The UN Global Compact
4. The OECD Guidelines for Multinational Enterprises
5. The Declaration on Fundamental Principles and Rights at Work and the Fundamental Conventions of the International Labour Organisation (ILO)
6. The UN Sustainable Development Goals (SDGs) and the 2030 Agenda on Sustainable Development
7. The UN International Conventions on Human Rights
8. The European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR)
9. The European Social Charter

SCOPE OF APPLICATION

This Policy is binding on:

- (i) the Members of the Board of Directors
- (ii) the executives of the company, and
- (iii) employees with a dependent employment relationship, those employed under work contracts, remunerated or non-remunerated mandate, independent service contracts and temporary employment, trainees, apprentices and volunteers, and those employed through third-party service providers.

PPC S.A. ensures that it cooperates with suppliers and other third parties that adopt similar policies in their businesses.



RESPECT FOR HUMAN RIGHTS

PPC S.A. acts proactively and ensures the protection, respect and observance of human rights.

At the same time, it puts in place mechanisms for restoration and redress in the event that it becomes aware of any violation of the Principles hereof.

i. Life, Health and Safety at Work

Health and Safety at work are of paramount importance and their protection is directly linked to the protection of human dignity and its inviolability. The Company supports and adopts a corporate culture that aims to promote health and safety at work as its key priorities.

The Company provides and maintains health and safety in the workplace for all its personnel, in accordance with the applicable occupational health and safety laws, minimising the risks of accident or injury.

Employees receive regular training on occupational health and safety issues and are provided with the appropriate Personal Protective Equipment for their work.

ii. Good working conditions

PPC S.A. remunerates its personnel in accordance with the applicable legislation, regulations and collective labour agreements, while the determination of the remuneration is based on objective criteria. For overtime work, statutory compensation is paid.

Furthermore, it ensures that employees are paid on time and on a regular basis and have access to their monthly payroll.

In addition, employees are granted all leaves provided for by the labour legislation, regardless of the employment relationship.

iii. Freedom of association and collective bargaining



PPC S.A. complies with the requirements of the legislation concerning the right of association and collective bargaining. It ensures that employees who participate in legally recognised trade unions do not face intimidation or harassment.

Moreover, it maintains open communication and promotes constructive dialogue with the legally elected representatives of employees, in mutual respect and in good faith at all times.

iv. Prohibition of Discrimination/Violence and Harassment at work

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

It provides equal opportunities in recruitment, as well as in the development, education, training, remuneration, and performance assessment of its employees. No discrimination will be tolerated on the basis of race, gender, colour, nationality or ethnic origin, social class, religion, age, disability, marital status, sexual orientation or gender identity, political and cultural beliefs or any other status protected by the applicable legislation.

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

v. Child Labour

PPC S.A. operates in accordance with all laws concerning the observance of the minimum age limits in the recruitment of its employees and contributes in every possible way and by all means possible to the effort to eliminate child labour.

vi. Slavery, forced labour and human trafficking

PPC S.A. prohibits the use of any form of forced, compulsory or bonded labour or human trafficking and demonstrates zero tolerance to incidents and situations that may favour any form of Modern Slavery.



vii. Personal Data Protection

PPC S.A. takes all appropriate measures to ensure the confidentiality, security and protection of the personal data of its employees and customers, as well as to prevent its alteration, damage, loss, destruction and accessibility by unauthorized third parties.

In addition, it ensures the effective exercise of the rights of its employees and customers, in relation to the processing of their personal data, in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 (GDPR) and the "Personal Data Protection Policy" approved by the Company's Board of Directors.

viii. Combatting Corruption

PPC S.A. works against corruption in all its forms. It prohibits and does not tolerate any form of bribery or extortion, while it proactively ensures the development of procedures and practices to combat and address corruption.

ix. Environmental protection

PPC S.A. supports and adopts a proactive approach to environmental challenges.

It continuously takes initiatives to promote environmental responsibility and encourages the development and dissemination of environmentally friendly technologies aimed at achieving the energy-green transition.

It is underlined that PPC's environmental strategy has been aligned with the ambitious medium and long-term goals of the European Union and Greece for climate neutrality by 2050. To this end, the Company's new Business Plan promotes, inter alia, the immediate implementation of the "Green deal" in electricity generation by:

-accelerating the withdrawal of lignite-fired power plants and of the corresponding mines,

-promoting RES as the new dominant energy generation technology,



-taking a leading role in the development of E-Mobility in Greece.

x. Rights of Local Communities

PPC S.A. recognizes the importance of its relationship with and the influence it exerts over decades on the local communities in which it operates.

Therefore, it respects, cooperates, communicates, consults and shapes, as far as possible, in cooperation with the local communities, actions, investments and decisions that may have an impact on the rights, quality of life and economic development and progress of the said communities.

xi. Disciplinary proceedings

Disciplinary proceedings are applied by PPC S.A. to its personnel, where deemed necessary, as a management tool to prevent unacceptable conduct and are in compliance with the labour legislation and the Company's regulations.

PPC S.A. ensures that these proceedings are applied with consistency and fairness to the entire personnel, while personal attributes such as gender, national origin, religion, etc. do not affect the results of the investigation of potential misconduct or the severity of any sanction. Moreover, the company encourages reporting by employees and all stakeholders of any misconduct for the purposes of further investigating and taking appropriate measures to restore legality, to impose sanctions for employee misconduct, as well as to prevent similar incidents to occur in the future ("Enforcement Policy, Reporting/Complaint Handling Procedure" as approved by the Company's Board of Directors).

xii. Corporate Social Responsibility

PPC S.A. consistently operates with responsibility and absolute transparency throughout its business activities. PPC's actions and the way it conducts its business are based on responsibility for the environment, implementation of best labour practices and care for its interactions with all stakeholders (customers, employees, shareholders, suppliers, local communities, etc.). It operates in a balanced manner, for the benefit of society and the Company, in accordance with the Company's Sustainable Development Policy, while its actions and objectives incorporate the E



(Environment), S (Society) and G (Governance) criteria in its operation as a Group and in all its business decisions.

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

It is also noted that PPC S.A. is fully aligned with the new philosophy of corporate responsibility within the framework of CSV (Creating Shared Value). Through CSV, it aims to achieve profit and financial strength while creating added value for the society and the environment. Moreover, PPC S.A. is constantly adapting its business practices towards this direction with a view to creating long-term value that is shared with all stakeholders while setting the conditions for sustainability for future generations as well.

ACTIONS AND PROCEDURES FOR THE IMPLEMENTATION OF THIS POLICY

Training and Awareness

The Company trains and provides information related to human rights respect to all its personnel.

In particular, as regards personnel training, the Human Resources and Organisation Division (HRO/Di), in cooperation with the Compliance Department (CD), takes the following measures:

- 1) Provision of relevant information, including the publication of the present Policy, through intranet, internal seminars and open discussions, etc.
- 2) Provision of a specialised E- Learning training programme, entitled "Human Rights in PPC SA" to all employees and executives.
- 3) Establishment of a help line within the Company to provide advice to employees with regard to human rights in the workplace and guidance from specialised executives.
- 4) Inclusion of human rights issues in the induction programmes for new recruits.



Violations of the Policy

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

Any employee who becomes aware of a violation of this Policy by another employee shall report such violation in accordance with the "Enforcement Policy, Reporting/Complaint Handling Procedure".

Obligations

It is the responsibility of each Head to adhere to this Policy in his/her area of responsibility, to set the tone from the top and to provide guidance to employees reporting to him/her.

Employees have a duty to adhere to the principles and rules set out in this Policy.

Monitoring, Review and Evaluation of the Policy Implementation

The HRO/Di, in cooperation with the CD, shall have the responsibility to ensure that the Policy remains updated and represents the best practice.

More in particular, they shall review it at least every two (2) years, or periodically as deemed necessary. Any updates, additions, and/or amendments to the Policy shall be approved by both the Chief Legal Affairs & Corporate Governance Officer and the Chief Human Resources & Organization Officer.