



People & Organization
Group Function

HR Operations
Department

Legal & Corporate
Governance Group
Function

Compliance & Corporate
Governance Department

HUMAN RIGHTS POLICY

Decision of the Board of Directors

POLICY APPROVAL HISTORY

RESPONSIBLE ORGANISATIONAL UNIT (POLICY OWNER)	Compliance and Corporate Governance Department Legal & Corporate Governance Group Function HR Operations Department People & Organisation Group Function
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06.06.2022	Approval and adoption of the Policy.	PPC Board of Directors (Decision no 54)
29.12.2025	Revision of the Policy to align with the applicable regulatory framework, the internal Policies and procedures of the Company and the Group.	Chief Legal and Corporate Governance Officer PPC Group and People & Organisation Group Function - PO/GrF (Decision no 12)

INTRODUCTION

PPC S.A., the parent company, and its subsidiaries (hereinafter the "PPC Group") constitute an innovative business Group and a pioneer in the creation and development of employment, labour relations, and human resources evolution, following best practices and rules to achieve excellence. Respect for and protection of human rights within its activities, as well as in its relationships with business partners have always been among the Group's priorities.

In this context, and in line with our commitments to implement the 10 Principles of the UN Global Compact—as integrated into other Group policies—this policy ensures the continuity and continuous improvement of results in relation to material issues affecting employees, other affected parties and groups involved in the current and future activities of the Group.

This includes:

Training and Awareness: The parent company and its subsidiaries conduct regular training sessions to inform and raise awareness among employees regarding the human rights principles and the Group's relevant commitments. These actions ensure that all employees are informed of their rights and obligations.

Monitoring and Reporting: The parent company and each subsidiary implement mechanisms to monitor compliance with human rights standards and provide relevant updates to the parent company, PPC S.A.

Involvement of Social Partners: The parent company and its subsidiaries collaborate with local communities, suppliers, and other stakeholders to promote and ensure respect for human rights. This includes procedures for identifying and mitigating any human rights impacts and risks associated with the activities of suppliers and other stakeholders.

PURPOSE OF THE POLICY

This Policy expresses the intention of the PPC Group to demonstrate no tolerance for violation of human rights, both by preventing such violations from the part of persons falling within the scope of this Policy and avoiding transactions with third parties who have provenly caused (at least upon issuance of first instance judgement) human rights violations. This Policy establishes a framework for the harmonisation and further implementation of the fundamental requirements (legal and other) regarding the respect for and protection of human rights, both within the Group and within its primary sphere of influence.

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 OECD Guidelines for Multinational Enterprises.

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

SCOPE OF THE POLICY

The present policy applies to:

- i. Members of the Board of Directors,
- ii. Executives,
- iii. Members of the Committees,
- iv. Company's employees under a contract of dependent employment, service providers under remunerated or non-remunerated mandate contracts, contracts for work, independent service contracts and temporary employment, interns, apprentices and volunteers, as well as affected stakeholders, including the Company's partners/suppliers who collaborate directly with the Group and participate in the first tier of their supply chain. The aforementioned stakeholders falling within the scope hereof are required to accept this Policy and contribute to its implementation, to the extent deemed appropriate.

The PPC Group ensures that it collaborates with suppliers and other third parties who have developed similar policies in their businesses.

ADOPTION OF THE POLICY BY SUBSIDIARIES

This Policy is adopted and implemented by the subsidiaries, provided that it does not conflict with more specific national or sectoral regulations governing each Company of the Group.

The Policy shall be adopted by each subsidiary company by decision of its Board of Directors making it binding on all executives and employees of that company.

The Policy shall be adopted and implemented by the subsidiaries, with the necessary adjustments as required by the size and respective activities of each Company, without altering its key principles and obligations.

Subsidiaries shall be required to implement feedback mechanisms to allow employees and other stakeholders to report any concerns or violations of the human rights policy (see Section XX).

RESPECT FOR HUMAN RIGHTS

The PPC Group, within its scope of activity, 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 any violation of the Principles hereof occurs.

i. Occupational Health and Safety

Occupational Health and Safety are of paramount importance and their protection is directly linked to the protection of human life, which, under all circumstances, is regarded as an inviolable principle. The Group invests in the development and fostering of a corporate culture that supports a safe working environment, adopting best practices for the recording, monitoring, and continuous reduction of factors that may lead to accidents, near-misses, or lost work time.

The PPC Group invests in employee training and strengthens its occupational health and safety management systems, while it encourages its partners to implement similar systems at their workplaces.

The PPC Group systematically informs its employees on occupational health and safety issues and provides the appropriate Personal Protective Equipment for each job position.

ii. Fair working conditions

The PPC Group remunerates its personnel in compliance with the applicable legislation, regulations and collective labour agreements, while the methodology for determining compensation is based on objective criteria. For overtime work, statutory compensation is paid.

Moreover, the PPC Group ensures that employees are paid on time and on a regular basis and have access to their monthly payroll.

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

iii. Freedom of association and collective bargaining

The PPC Group complies with the requirements of the legislation concerning the right of association and collective bargaining. It ensures that employees who participate in a legally recognised labour union (where applicable) do not face intimidation or harassment. In addition, it maintains open communication and promotes constructive dialogue with the legally elected employee representatives, with mutual respect and always in good faith.

iv. Prohibition of Discrimination/Violence and Harassment at work

The PPC Group recognises the importance of diversity and demonstrates no tolerance for violations involving incidents of unequal treatment, violence, and harassment. In this context, it also acknowledges the need for the adoption of

measures to protect the rights of more vulnerable groups (such as women, migrants, and persons with disabilities, in line with the Commission Delegated Regulation (EU) 2023/2772 dated July 31, 2023), across all its activities.

It provides equal opportunities in recruitment, as well as in the development, education, training, remuneration, and performance assessment of its employees. Discrimination based on 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, is not tolerated.

The Group does not tolerate any form of physical, verbal, sexual or psychological harassment or violence, or threats and intimidation at work, by adopting a relevant mechanism for receiving and promptly investigating reports/complaints of violence and harassment incidents (see also "[Policy against Violence and Harassment at Work](#)").

v. Child Labour

The PPC Group demonstrates no tolerance for violations concerning incidents of child labour. It operates in accordance with all laws concerning the observance of the minimum age limits in the recruitment of its employees and contributes by every possible means and methods to the effort of eliminating child labour.

vi. Slavery, forced labour and human trafficking

The PPC Group demonstrates no tolerance for violations concerning forced labour incidents, as well as for conditions which may favour any form of modern slavery. The Group prohibits any form of forced, compulsory or bonded labour or human trafficking.

vii. Personal Data Protection

The PPC Group 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, as well as accessibility by unauthorised 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, pursuant to the provisions of the General Data Protection Regulation (EU) 2016/679 (GDPR) (see also "[PPC Group Personal Data Protection Policy](#)").

viii. Ethical marketing standards

The use of unfair or misleading advertising and marketing strategies shall not be an option for PPC. The PPC Group is committed to responsible communication with consumers and end-users.

ix. **Combatting Corruption**

The PPC Group demonstrates no tolerance for violations concerning corruption incidents and acts against it in all its forms. It prohibits and demonstrates no tolerance for any form of bribery or extortion, while it proactively ensures the establishment of procedures and practices to combat and address corruption.

x. **Environmental protection**

The PPC Group supports and adopts a precautionary approach to environmental challenges. It continuously undertakes initiatives to reduce its environmental footprint and encourages the development and dissemination of environmentally friendly technologies, aiming to achieve the green energy transition.

xi. **Rights of Affected Local Communities**

The PPC Group recognises the importance of its relationship with and the influence it exerts over decades on the positively or negatively affected local communities, in which it operates.

Therefore, it respects, cooperates, communicates, consults and shapes, as far as possible, in cooperation with the affected local communities, actions, investments, and decisions that may have an impact on the rights, well-being, economic development, and social progress of these communities.

xii. **Disciplinary proceedings**

Disciplinary proceedings are applied by the PPC Group to its personnel, where deemed necessary, as a management tool to prevent unacceptable conduct and are always in compliance with the labour legislation, the collective labour agreement, as well as the rules of operation of each Company of the Group.

The PPC Group ensures that the said proceedings are applied with responsibility, 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.

In particular, the PPC Group encourages the reporting of any misconduct by employees and all stakeholders for the purpose of further investigation and the implementation of appropriate measures to prevent similar incidents in the future, while protecting whistleblowers from disciplinary action and any form of retaliation. The PPC Group shall not tolerate harassment or any actions and behaviours that are demeaning, intimidating, or hostile. Retaliation or intimidation against people who report matters in good faith is strictly prohibited (see also "[Enforcement Policy & Report/Complaint Handling Procedure](#)").

xiii. **Corporate Social Responsibility**

The PPC Group always operates with responsibility and absolute transparency in all its business activities. The Group's activities and the conduct of its business practices entail environmental responsibility, implementation of best labour

practices and due care in its interactions with all stakeholders. In this context, it has endorsed the 10 Principles of the United Nations Global Compact since 2022. The Group operates in a balanced manner, in accordance with its Sustainable Development Policy, while through the actions and the goals it sets, it integrates E (Environment), S (Society), and G (Governance) criteria into its operations and business decisions.

The PPC Group is committed to incorporating practices and initiatives to create socio-economic shared value across all its sectors, in order to ensure long-term positive impact on the environment, its human resources, the affected communities in which it operates, as well as society at large. The core principles of Creating Shared Value (CSV) are integrated into the Group's business values, aiming to create long-term value for society by reshaping energy products and services, redefining productivity within its value chain, and making investments in the affected communities where it operates, thereby strengthening the local economy and human capital.

ACTIONS AND PROCEDURES FOR THE IMPLEMENTATION OF THIS POLICY

The implementation and oversight of the principles set forth herein are based on suitable risk identification, prevention, and mitigation procedures regarding the safeguarding of fundamental human rights. The identification and assessment of risks related to adverse impacts on human rights protection is continuous and feeds into the Group's Double Materiality Assessment (DMA).

All Group Functions participate in the training of the Group's employees and business partners for the implementation and effective evaluation of this policy, as well as in developing proposals for its improvement.

The PPC Group incorporates respect for human rights, including labour rights and customer/consumer rights, into its corporate governance and decision-making processes. This ensures that human rights are an integral part of the Group's operations and strategy, with clear accountability at all levels.

In this context, the PPC Group has established multiple communication channels (based on the OECD Guidelines for Multinational Enterprises and European Sustainability Reporting Standards - ESRS) for its employees and stakeholders for the submission of complaints, such as complaint forms, email and customer call centres, while it has implemented a formal grievance mechanism governed by the "Enforcement Policy & Report/Complaint Handling Procedure", aiming to identify and assess the actual and potential impact on human rights (see also "[Enforcement Policy & Report/Complaint Handling Procedure](#)").

Each subsidiary must establish equivalent channels and mechanisms for the effective management of the concerns. In compliance with its Human Rights Policy, the PPC Group implements proactive measures for the prevention, mitigation and remediation of human rights impacts, implementing grievance mechanisms to investigate incidents, develop action plans and provide suitable remediation when adverse effects are detected.

In the event of adverse human rights impacts, the PPC Group shall take measures to ensure that fair and efficient actions are implemented, while maintaining its

commitment to respecting and promoting human rights in all its activities.

Finally, the PPC Group informs affected stakeholders of its initiatives and the outcomes thereof concerning the mitigation of risks associated with fundamental rights violations. This feedback is utilised through the Group's annual Sustainability Report, with the aim of ensuring transparency and maintaining trust, as well as continuously improving the content of this policy and its related actions.

Training and Awareness

The PPC Group promotes awareness and respect for human rights to all employees and third parties, such as suppliers. To this end, training and awareness initiatives regarding human rights are implemented across the entire organisation. In particular, the Group promotes awareness on human rights through dedicated training courses, including specialised e-learning modules and workshops. Emphasis on human rights principles shall also be given during induction training for newly recruited employees, while suppliers are informed of the main procedures and policies adopted by the PPC Group, including the "[Suppliers/Partners' Code of Conduct](#)", which is signed by each Contractor.

These efforts aim to integrate human rights into the Group's daily operations, as well as to enhance the adherence to the Group's values across its entire value chain. Each subsidiary of the Group shall be responsible for the implementation of these practices, in accordance with the relevant national regulatory framework.

Violations of Policy - Reporting of Infringements

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

Any individual who becomes aware of a violation of this Policy shall report such incident via the established reporting channels, anonymously or by name (see "[Enforcement Policy & Report/Complaint Handling Procedure](#)") and in accordance with the respective internal procedures. The PPC Group pledges that there will be no retaliation or acts of revenge against anyone for expressing a concern.

Obligations

It shall be the responsibility of each Head to adhere to this Policy in his/her area of responsibility, to set the tone from the top and provide guidance to employees reporting to him/her. The individuals to whom this policy applies/is addressed shall also have the duty to comply with the Principles and rules set forth.

Finally, the adherence to the Human Rights Policy shall be monitored through regular internal audit and compliance reviews, including the continuous assessment of the potential risks arising from non-compliance across all the Group's organisational units.

Monitoring, Review and Evaluation of the Policy Implementation

The People & Organisation Group Function, in cooperation with the Legal & Corporate Governance Group Function, shall be responsible for updating this Policy

and shall be based on best practices.

In particular, the Policy shall be reviewed at least every two (2) years or periodically, when deemed necessary. Any updates, additions and/or amendments to the Policy shall be approved by both the Chief Legal & Corporate Governance Officer PPC Group and the Chief People & Organisation Officer PPC Group.

Finally, the Management of each Group subsidiary shall be responsible for the adoption of this Policy, appropriately adapted to the nature, scope and complexity of its operations, while taking into account the applicable regulatory framework of the country in which it operates.