

ATHENS TRANSPORT GROUP (OASA-STASY-OSY)



transport
for athens

2022

**SUSTAINABILITY
DEVELOPMENT
REPORT**







transport
for athens

2022

**SUSTAINABLE
DEVELOPMENT
REPORT**

ATHENS TRANSPORT GROUP (OASA-STASY-OSY)

Table of Contents

Management Message	5
2022 at a Glance	6
1. About Athens Transportation Group	8
1.1 Profile.....	9
1.2 Vision, Mission and Values.....	11
1.3 History and Milestones.....	12
1.4 Value Chain and Business Relations.....	16
1.5 Memberships and Collaborations.....	17
2. Approach to Sustainable Development	18
2.1 Management of Sustainable Development Issues.....	27
2.2 Stakeholder involvement.....	28
2.3 Double Materiality Analysis.....	29
3. Environment	36
3.1 Climate change.....	37
3.2 Resource and Waste Management.....	38
4. Society	42
4.1 Labour Relationships and Practices.....	44
4.2 Sustainable Urban Mobility.....	58
5. Governance	66
5.1 Corporate Governance.....	68
5.2 Business Ethics.....	70
6. Appendix	73
6.1 About the Sustainability Report.....	74
6.2 GRI Table of Contents.....	75
6.3 SASB Table of Contents.....	77
6.4 Key ESG Performance Indicators (KPIs).....	78





Management Message

2022 has been another unpredictable year. While the pandemic is mainly behind us, geopolitical turbulence, the energy crisis, and the ensuing recession have deeply affected people and businesses worldwide. In the midst of these challenges, of course, we cannot lose sight of the urgency of climate change.

These multiple crises of recent years have not left Athens Transport Group and public transport commuters unaffected, which has emphatically demonstrated the need to upgrade the resilience and sustainability of urban transport.

Sustainability at the core of our values

In 2022, in cooperation with Growthfind, we laid the foundations for developing a holistic sustainability strategy to adequately address the present and future challenges and respond to our multiple roles.

The companies of the Athens Transport Group (OASA, OSY, STASY) cover the transportation needs of thousands of people every day, taking care of the economically weaker, offering an essential social project and giving impetus to the development dynamics of Attica. At the same time, given the economies of scale achieved in transportation, public transport is the friendliest and most efficient way of transportation within the city, contributing to the overall reduction of pollutant emissions.

The implementation of the sustainability strategy, in this way, comes to be

incorporated into the already existing values of the companies of the Athens Transport Group and to further enhance the positive externalities it produces, for public transport to become the first choice of transportation in the broader area of the capital. This goal drives us to provide passengers with upgraded, sustainable, inclusive and safe urban transportation services to passengers.

Putting Green Urban Transport into Practice

While we take a holistic, sustainable approach, the greatest opportunity for change lies within the environmental pillar of sustainability. On an annual basis, according to the Carbon Footprint Report of the Group's companies for 2022, we emit thousands of tons of greenhouse gases. So, we recognize that we are, in fact, part of the problem.

However, we are also part of the solution since the companies of the Group can contribute to the further reduction and

However, we are also part of the solution since the companies of the Group can contribute to the further reduction and long-term elimination of CO₂ emissions from urban transport.

long-term elimination of CO₂ emissions from urban transport.

In 2022, we made significant progress towards that. OSY is gradually renewing the bus fleet through the open tender conducted by the Ministry of Infrastructure & Transportation for the supply of 140 electric and 300 CNG vehicles. Accordingly, STASY has started the gradual withdrawal of 14 trains of Line 1, a project expected to reduce the trains' energy consumption by 12%.

At the same time, given that the Group fully adopts the European Green Deal, a study was completed within 2022 - Roadmap for harmonization with the objectives of the Green Agreement and includes a series of actions and actions in the areas of the circular economy, green mobility, the integration of ESG criteria and digital transformation.

We are Our People

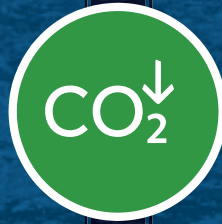
The implementation of a sustainability strategy in a Group with over 7,000 employees, most of whom work under challenging conditions, would be ineffective if it was not inclusive towards them. To this end, we ensure a balanced relationship between professional and personal life, a healthy working environment, and all the necessary supplies through continuous education and training to upgrade their skills. Sustainable development is the only way to improve the resilience of communities, but it cannot be achieved alone. For this reason, we actively participate in International Associations, Stakeholder Consultation Committees, and research and development (R&D) programs, recognizing the need for collaboration to achieve the green transition. It is our obligation to take action and, with every action, acquire environmentally friendly vehicles with zero footprint, thus shaping the sustainable urban transport of the future. 2022 was another

unpredictable year. While the pandemic is largely behind us, the geopolitical turmoil, energy crisis, and subsequent recession have deeply affected people and businesses worldwide. In the midst of these challenges, of course, we cannot overlook the urgency of climate change. These multiple crises of the last few years did not leave the Athens Transport Group and the commuters with Mass Transport unaffected, which emphatically demonstrated the need to upgrade the resilience and sustainability of urban transport.

Spiliopoulos Georgios
CEO of OASA



2,095,802,997
MJ energy consumption



224,822 t CO₂e,
greenhouse gas emissions
(Scope 1 and Scope 2)

13%
of OSY's vehicles
are powered by electricity



Initiation of the environmental
management certification pro-
cess according to ISO 14001 in
OSY



Avoidance of use of
800,000
cars from the use
of public transport

2022 at a Glance

49,203
hours of training



414,255,000
boardings



3,667,923
Routes



66
new employee hires

139,048,036
vehicle-kilometres



7,228
7,228 employees
108 OASA
4,801 OSY
2,319 STASY

Zero incidents
of violation of labour rights
in the Group's value chain





01

About Athens
Transportation Group

1.1 Profile

GRI 2-1, GRI 2-6

Athens Urban Transport Organization S.A. (OASA)

OASA S.A. is a Legal Entity of Private Law, a public utility operating as a Societe Anonyme. It was founded by Law 2175/1993 as the universal successor of OAS. It is a 100% subsidiary of the Hellenic Corporation of Assets and Participations (HCAP - Growthfund), was founded in 1993 and is based in Athens, at Metsovou Street 15. OASA has two subsidiaries, Road Transport S.A. (OSY) and Urban Railtransport S.A. (STASY).

Road Transport S.A. (OSY)

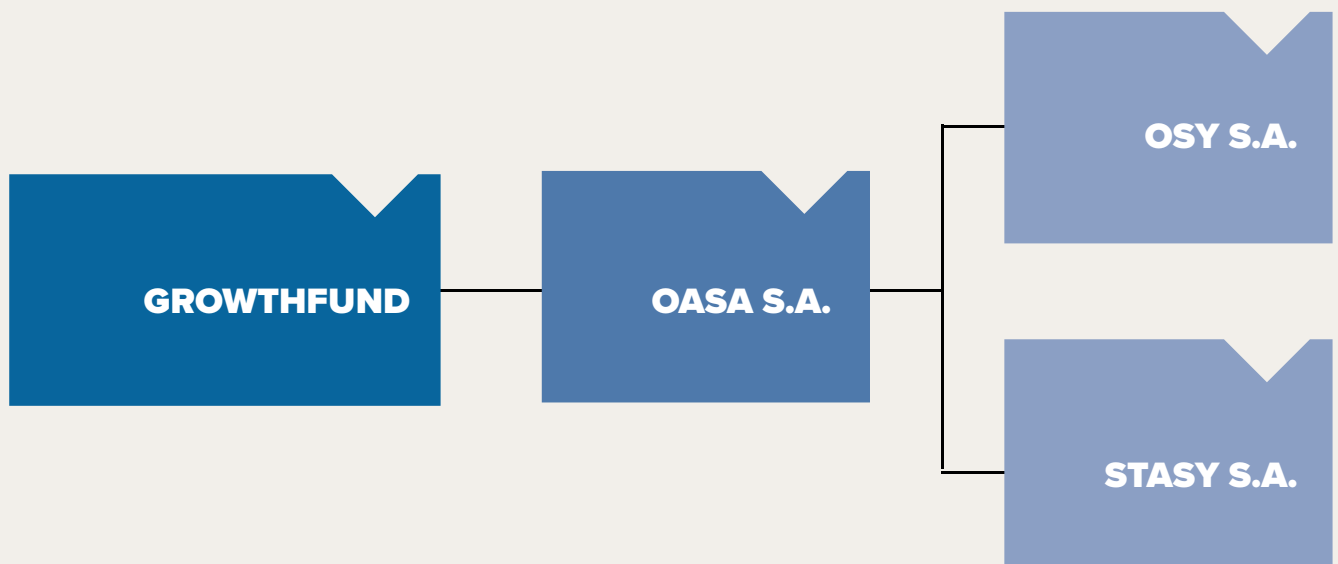
OSY S.A. was established pursuant to the provisions of Law 3920/2011 (Government Gazette 33/B/03.03.2011) and is a Legal Entity of Private Law, serving public utility purposes, falling under the category of organizations and enterprises of the wider public sector and operating under the rules of the private economy. As a Transport Company (TPPC), it is coordinated and controlled by OASA, which is its sole shareholder, under the supervision of the Ministry of Infrastructure and Transport. OSY is located in privately owned facilities at 6 Parnassou Street, in the Municipality of Agios Ioannis Rentis, where the Central Administrative Services of the company are housed.

Urban Railtransport S.A. (STASY)

STASY S.A. is a legal entity of private law that serves public utility purposes and falls under the category of organizations and enterprises in the broader public sector (public utility companies). It operates based on the rules of the private economy. As a Transportation Project Provision Company (TPPC), it is coordinated and controlled by OASA and is governed by the provisions of Laws 3920/2011 and 4972/2022 as in force, as well as by the provisions of the legislation on sociétés anonymes. The Ministry of Infrastructure and Transportation supervises the company, but it is not listed on the Stock Exchange, and OASA is its sole shareholder. STASY does not appertain to Article 23 (2) of Chapt. C of Law 993/79.

It is a public company for the development and operation of the network of metro lines 1, 2 and 3, and the tram in Attica, as a renaming of Attiko Metro Etaireia Leitourgias S.A. (A.M.E.L. S.A.), into which TRAM S.A. and Ilektrikoi Sidirodromoi Athinon Peiraios S.A. (I.S.A.P. S.A.) merged in the light of the general restructuring of the public sector and the restructuring of urban transport. Urban Railtransport (STASY) is based in Athens, at Athinas 67.

OASA and its subsidiaries operate in the Attica basin and form the "Athens Transport Group".



Graph 1: Athens Transport Group Structure

The Role of Athens Transport Group

The Athens Transport Group (OASA – OSY – STASY) is the largest transportation operator in Greece, responsible for the control and operation of public transport in Athens and Piraeus, as well as in the wider area of the Attica basin and other areas of the prefecture of Attica. The aim is to provide reliable transportation services so that Urban Transportation is established in the consciousness of the citizens of the basin and the visitors of the city as their first choice for transportation. The main responsibilities of Athens Transport are reflected in the table below:

Table 1: Responsibilities of Athens Transport Group

Table 1: Responsibilities of Athens Transport Group	
Athens Transport Group (OASA – OSY – STASY)	Exploitation, development and disposal of all kinds of assets.
OASA	Strategic and operational planning and coordination and control of the provision of transport services in all modes of public transport.
	Control and supervision of TPPCs.
	Distribution of transport work in TPPCs.
	Assignment and supervision of transportation and traffic studies.
	Preparation of a five-year Strategic Plan and approval of the Business Plans of the Group's companies.
	Specifications of the level of passenger service.
	Regulation of matters relating to the operation of public transport in the area of its competence and, in particular, the definition, abolition and extension of lines, the definition of routes and timetables, the starting points, terminals and stops of each line.
	Control of public transport routing schedules.
	Collection and processing of data on the operation of public transport companies and the recommendation to the Minister of Infrastructure and Transport for the determination of the appropriate fare and the financing of their investment and development programmes.
OSY / STASY	Proposal to the Minister of Infrastructure and Transportation is to define the technical specifications of the types of public transport vehicles in cooperation with the TPPCs.
	Sales promotion, planning, collection and fare controls.
	Execution of the transport project according to OASA's planning and distribution.
	Preparation of business plans and their submission for approval to OASA.
	Study, solution and general treatment of any problem related to the execution of the transport project.
	Design procurement, maintenance, repair, utilization and exploitation of their rolling stock and other equipment.
Provisional and final acceptance as well as monitoring of the works and supplies executed by ATTIKO METRO on behalf of the Athens Transport Group.	

The Role of OASA in the Greek Economy

OASA, as the parent company of OSY and STASY, in addition to its operational planning responsibilities (ground and underground public transport), coordination, and control of the transport performed by its subsidiaries, is also responsible for the promotion of sales of the Athens Transport Group, planning, collection and fare control. At the same time, on the basis of project, cost and quality indicators included in the transport contracts with the TPPCs, OASA undertakes the distribution of revenues among the companies.

With the provisions of Law 4512/2018, as of 1.1.2018, all ownership shares are transferred to Growthfund with the following fundamental obligations of the Group to the Shareholder (HCAP - Growthfund):

- Alignment with the strategic, operational and financial objectives of Growthfund, aiming to maximize its long-term economic value.
- Compliance with the rules and instructions of Growthfund in terms of restructuring, corporate governance, corporate compliance, supervision, social responsibility, transparency of procedures and accountability.
- Creation of benefits that are in line with the crucial developmental, economic and social role of the Group. In particular, the provision of public service shall be under the relevant EU framework, but it must also comply with the framework of specific obligations assigned to OASA by the state.
- Seeking synergies between the activities of its subsidiaries and introducing best practices of internal management, aiming to improve the Group's operation and services and achieve multiplier benefits (economies of scale, alignment of horizontal policies, etc.).

1.2 Vision, Mission and Values



Vision

The Athens Transportation Group has as its primary concern the contribution to the prosperity and economic development of the country through the development of sustainable and attractive Public Transport so that they become the first choice of transportation in the greater Athens area, thus contributing to the economic, social and environmental development of the capital.

“Our vision is the effective coverage of transport needs of the capital's citizens with quality services.”



Mission

The mission of the Athens Transport Group is the strategic and operational planning, coordination and control of the transportation work performed by the means of public transport (ground and underground) in the Attica Region, as well as the promotion of reforms through restructuring, optimal corporate governance, transparency and innovation, with responsible management and social responsibility.



Values

Achieving the vision and mission requires a framework of principles and values, including:

Defense of Public Interest

The Group is committed to better managing and utilising the fleet and the entire passenger transport infrastructure, aiming to create long-term value, increasing revenues and providing citizens better, more efficient, safer and high-quality passenger transport services.

Groupness

The Group promotes a corporate culture of "groupness" by implementing each reorganization action.

Equality

Every intervention in the urban transport system of Attica ensures -without discrimination- everyone's access to it, with special care for the disabled and vulnerable social groups.

Sustainability

Every intervention in the urban transport system of Attica is made with the system's sustainability in mind, i.e. ensuring it in the long term.

Transparency

The Group operates with transparency, accountability and open communication, information and consultation with all interested parties, aiming at building and strengthening trust with citizens in the procedures and operation of the OASA and subsidiaries, OSY and STASY.

Merit and Social Responsibility

The Group operates in a meritocratic manner, promoting diversity and ensuring equal treatment and opportunities in the workplace, not allowing prejudices.

Respect for Citizen's Rights

The Group acts responsibly towards society as a whole and demonstrates behavior within the framework of principles of professional and business ethics, which does not harm its image, reputation and work.

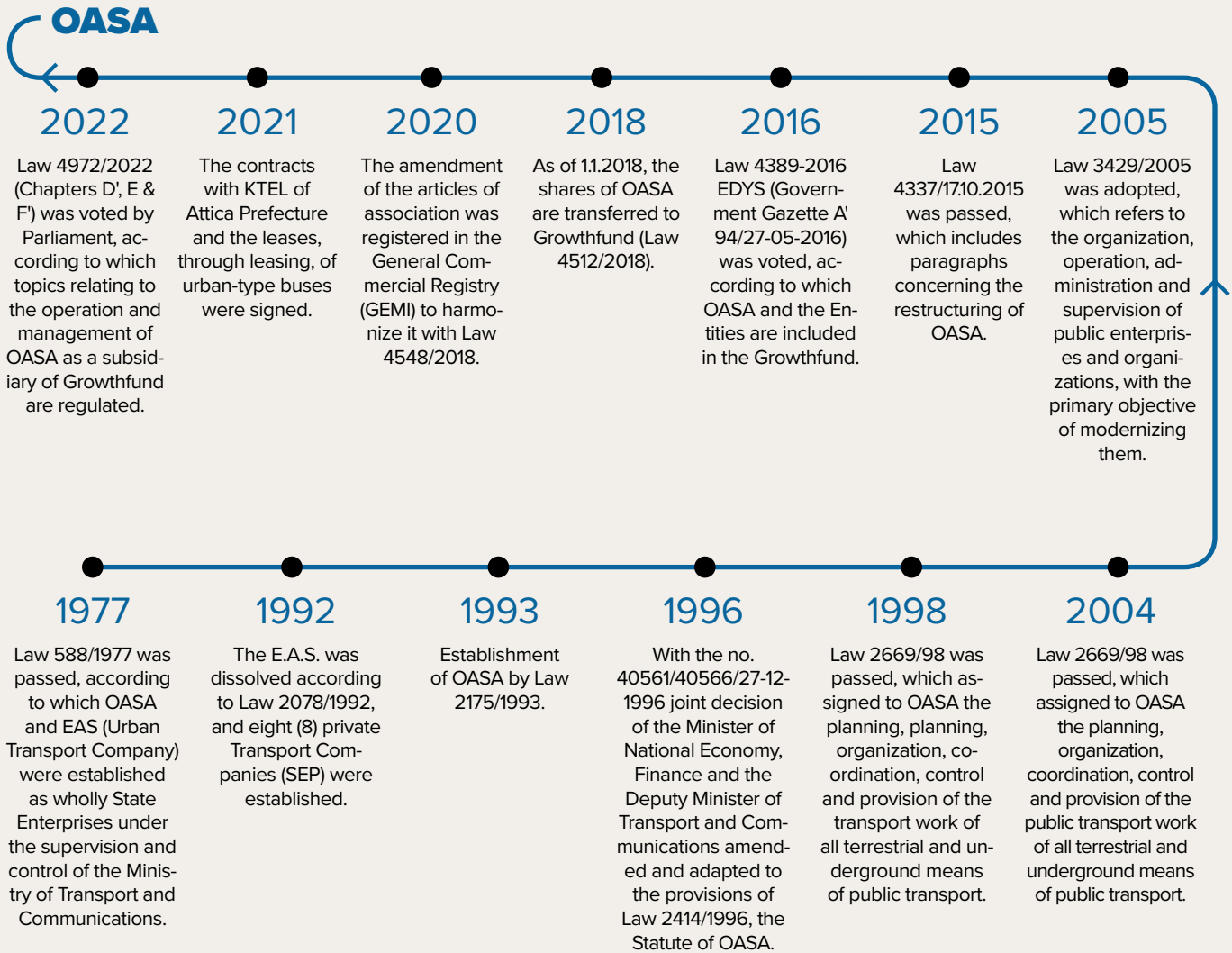
Partnerships

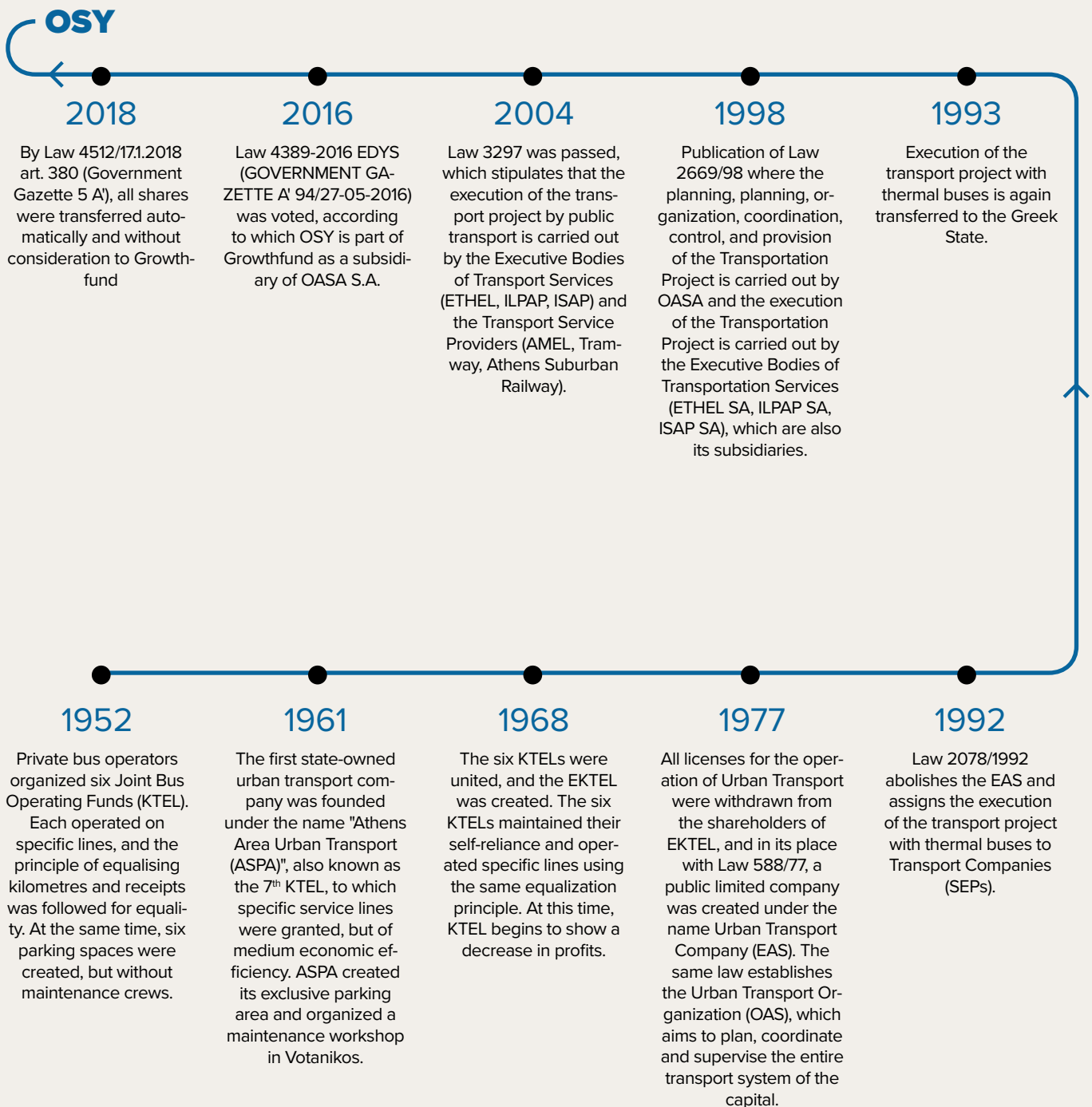
The Group constantly seeks, promotes and utilizes partnerships with all interested parties to achieve its goals.

Consultation

The planning of the transport project of Attica is the subject of active participation of the productive and social forces through the participation of institutions and citizens using modern means.

1.3 History and Milestones





STASY

2022

Delivery and operation of 3 new stations Maniatika, Piraeus, Dimotiko Theatro on Line 3.

2022

The contract for upgrading 14 trains of Line 1 of the Athens Metro was signed in December 2022 between STASY and the contractor.

2021

Operation at an additional 11 stops of the line to Piraeus (Gipedo Karaiskaki, Mikras Asias, Lambraki, Evangelistria, Platia Deligianni, Dimarhio, Agia Triada, Platia Ippodamias, 34ou Syntagmatos, Androutsou, Skylitsi).

2021

The extension of Line 2 to Piraeus is under construction.

2020

Delivery of 3 new stations, Agia Varvara, Korydallos, and Nikaia on Line 3.

2016

Law 4389-2016 EDYS (GOVERNMENT GAZETTE A' 94/27-05-2016) was voted, according to which STASY is part of the Growthfund.

1937

The Electric Transport Company (H.E.M.) undertakes the electrification of the Kifissia Railway.

1939

Renovation of all tramways in use.

1940

Delivery of 60 large, modern tramway vehicles.

1953

Decommissioning of the Patissia – Ampelokipi and Kypseli – Pangrati lines.

1957

Completion of transportation from Piraeus to Kifissia with the Electric Railway.

1960

Closure of the Athens Tram.

1976

EIS is part of the Greek State and was renamed ISAP SA (Athens-Piraeus Electric Railways Societe Anonyme).

1936

Inauguration on 20/7/1936 of the suburban tramway line (tram) Piraeus – Perama, 10 km long.

1926

Cooperation between SSP and Athens-Piraeus tramways with the English POWER Group.

1911

Commencement of freight transport by SAP between Piraeus and "Thisio" station.

1910

Inauguration of the new electric tram of SAP.

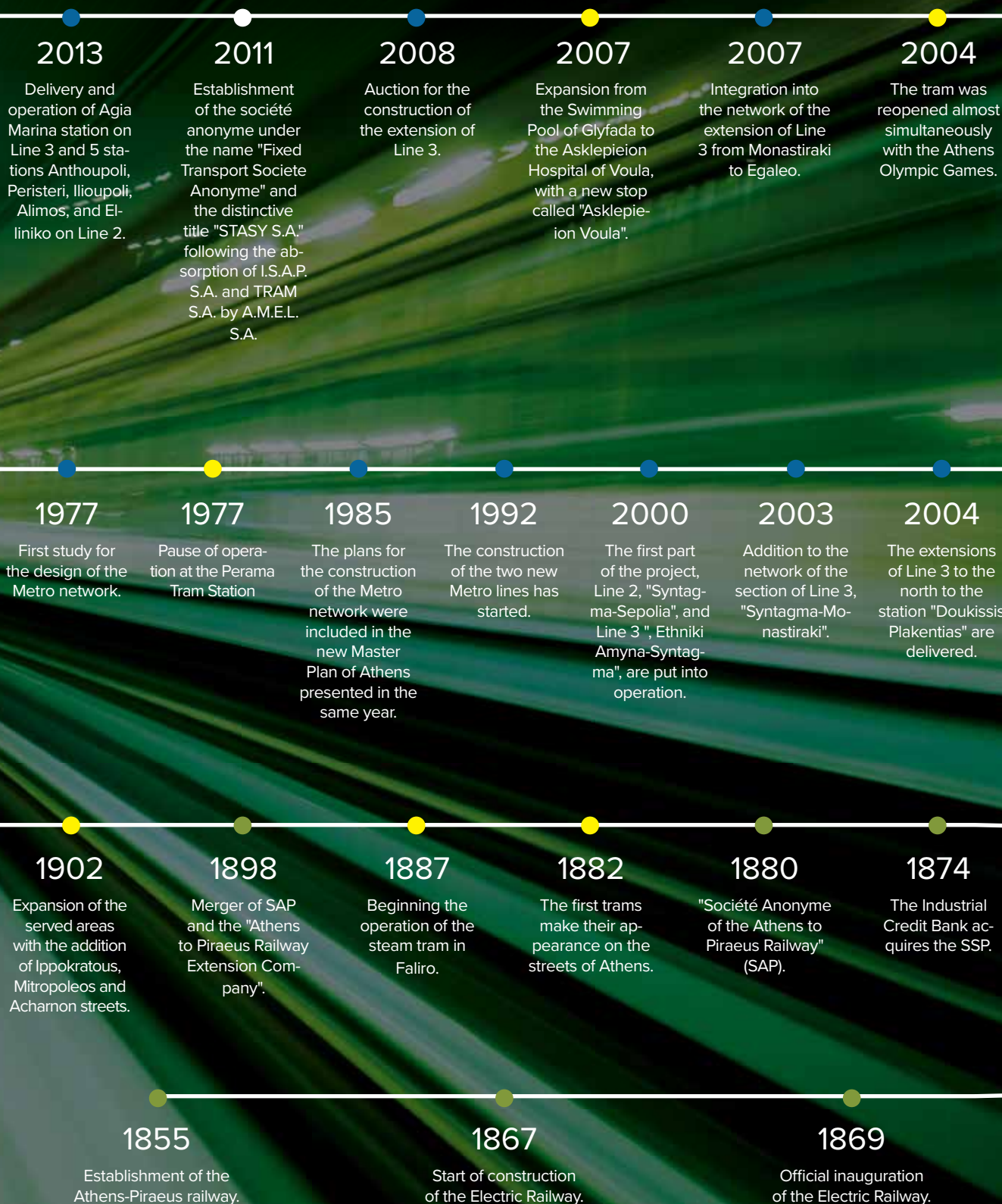
1908

Launch of the first electric trams to gradually replace horse-drawn ones.

1904

Inauguration of the new electrified double track of the Piraeus – Athens Urban railway (Omonoia).

- METRO Line 1
- METRO Line 2 and Line 3
- TRAM



1.4 Value Chain and Business Relations

GRI 2-6

Table 2: Activities and business relations in the Group's value chain		
Upstream	Athens Transport Group Activities	Downstream
<ul style="list-style-type: none"> • Governance Bodies and Independent Authorities¹ • Local government • Manufacturers • Security and cleaning services • Suppliers of equipment, raw materials and materials • Utility providers 	Transportation Planning & Development	<ul style="list-style-type: none"> • Passengers • Subsidiaries
<ul style="list-style-type: none"> • Governance Bodies and Independent Authorities¹ • Subcontractors • Security and cleaning services • Suppliers of equipment, raw materials and materials • Utility providers • Fuel suppliers for operation and maintenance purposes 	Implementation of the public transport project with (ground and underground) means of fixed track within the boundaries of the Attica Region (STASY)	<ul style="list-style-type: none"> • Local communities • Passengers
<ul style="list-style-type: none"> • Governance Bodies and Independent Authorities¹ • Subcontractors • Security and cleaning services • Suppliers of equipment, raw materials and materials • Utility providers • Fuel suppliers for operation and maintenance purposes 	Implementation of the public transport project by land roads, within the boundaries of the Attica Region (OSY)	<ul style="list-style-type: none"> • Local communities • Retailers • Passengers • Shop tenants • Users of infrastructure (boarding stations) • Parking services • Taxi services

Service Modernization and Digital Transformation

Transportation planning and monitoring of its implementation is a primary activity for OASA, which organizes the public transport network, including buses, trolleybuses, trams and metros, to ensure effective and efficient mobility. The Group's transportation activities during 2022 focused on three main axes:

- The first axis is to upgrade the transport operation and passenger experience for public transport to regain passengers' trust after the COVID-19 pandemic.
- The second axis concerns the reduction of the environmental footprint and alignment with the Green Deal by promoting sustainable urban mobility through actions such as replacing the Group's light vehicles with low or zero-emission vehicles.
- The third axis concerns the actions for drafting the Strategic Plan of Urban Transport of Athens, i.e., the program of development studies required for the formulation of the medium-long term General Plan for the Development of Transport in Attica.

Implementation of the public transport project by land roads within the boundaries of the Attica Region (OSY)

The purpose of OSY is to produce the transport project, with the responsibility for executing the public transport project by land road means within the boundaries of the Region of Attica, as defined in Law 3852/2010, except for the islands. In addition, the transport network of thermal buses has an area of about 3,976 km, and electric vehicles are about 380 km out of a total of 4,536 km. It is one of the largest in Europe.

Implementation of the public transport project with means of fixed track within the boundaries of the Attica Region (STASY)

STASY has as its main responsibility the execution of the transport project within the boundaries of the Region of Attica for the service of passengers, with terrestrial and underground public transport, with the primary goal of saving resources through the creation of economies of scale and in terms of the transport dimension, the necessary complementarity of MTAs, so that they are established in the consciousness of the citizens of the Basin and the visitors of the city, as their first choice for their transportation. The company's leading strategic choice is to recognize and respond to the needs of its passengers continuously.

1. Ministry of Labour and Social Security, Ministry of Infrastructure and Transportation, Ministry of Health and Ministry of National Economy and Finance.

Assignment of Transport Project to KTEL

Due to the special conditions created by the pandemic of the disease COVID-19 in 2020², it became necessary to reorganize the frequency of the transport service and take extraordinary measures to provide the transport service with high-quality standards. For the above reasons, as of October 2020, KTEL has been entrusted with the execution of urban and special local routes and regular road passenger transport in the Region of Attica (OASA's area of responsibility).

This cooperation serves the purpose of imperative public interest, which consists of the need to ensure the uninterrupted, continuous, and undisturbed provision of the public urban transport service to every potential passenger in the area of OASA's responsibility.

1.5 Memberships and Collaborations

GRI 2-28

At Athens Transport Group, it is a common belief that strong networks and partnerships can contribute significantly to the vision and realization of its mission. The companies of the Athens Transport Group (OASA, OSY – STASY), having as a vision the development of an innovative mentality for the continuous upgrading of its services, monitor and participate in International Associations, Stakeholder Consultation Committees as well as in research and development (R&D) programs for the design, development and provision of innovative services to passengers.

The utilization of international experience, stakeholder consultation and synergies in the field of research are important priorities for OASA as they add value, contribute to the pillars of Environment–Society-Governance (ESG) and highlight its social role. At the same time, they enhance extroversion to help develop a network of strategic partnerships at the European and international level while strengthening and developing its human resources as they improve their knowledge and skills through exchanging experiences, know-how and best practices. In this context, the following participations and collaborations of OASA stand out:

- [International Association of Public Transport \(UITP\)](#)
- [EBRT2030 \(European Bus Rapid transit of 2030: electrified, automated, connected\)](#)
- [European Metropolitan Transport Authorities \(EMTA\)](#)
- [Standing Committee on Issues of Persons with Disabilities of the Ministry of Infrastructure and Transport](#)
- [IP4MAAS: SHIFT2RAIL - Innovation Programme 4 to support the deployment of mobility as a service \(2020-2023\)](#)
- [FRONTIER \(Next-generation traffic management for empowering CAVs integration, cross-stakeholder collaboration and proactive multi-modal network optimization\)](#)
- [CONDUCTOR \(Fleet and traffic management systems for conducting future cooperative mobility\)](#)
- [PISTIS \(Promoting and Incentivising Federated, Trusted, and Fair Sharing and Trading of Interoperable Data Assets\)](#)
- [HARMONY \(Holistic approach for providing spatial & transport planning tools and evidence to metropolitan and regional authorities to lead a sustainable transition to a new mobility era¹, 2019-2022\)](#)
- [Participation in the Board of Directors of the Panos Mylonas Road Safety Institute.](#)
- [Participation in the Digital Transformation Executive Network of the Digital Transformation Bible 2020-2025 of the Ministry of Digital Governance.](#)
- [Participation in the Joint Digital Transformation Cooperation Group of the Group's companies, which has as its object the design of joint actions and projects such as Group ERP Preparation of a Strategic Plan for the Exploitation of New Technologies within the Group \(Group Digital Strategy\).](#)

It is worth noting that the synergies developed by OASA generate revenue, in addition to implementing ESG priorities and enhancing extroversion via its self-determination to scientific teams, proving that participants in these programs recognize OASA as a consistent and capable partner.

² Within the framework of the contract 108/2020 "Assignment of the execution of urban and special local routes in the area of responsibility of OASA (ΑΔΑ ΩΑΖΝ46ΨΧΕ3-Η06)", which expired on 6.10.2022, and on 6.12.22 the contract 96/2022 was signed for the continuation of the cooperation.

02

Approach to Sustainable Development



The Group's commitment to sustainable development, initiatives, and actions are adopted to reflect an integrated approach to the green transition. This holistic approach, on the one hand, enhances sustainable mobility, environmental sensitivity and social responsibility, and on the other hand, contributes to the achievement of the United Nations Sustainable Development Goals (SDGs).

The Group adopts the European Green Deal and develops initiatives related to the circular economy, green mobility, clean technologies, building renovation & RES, energy efficiency and nature protection. In this context, the Group seeks to continuously reduce its carbon footprint by taking actions to integrate new vehicles with anti-pollution technology and zero emissions and to upgrade energy efficiency in its companies' facilities. Furthermore, in collaboration with Municipalities, it creates Sustainable Urban Mobility Plans, promoting sustainable modes of transport to reduce greenhouse gas emissions.

In addition, the companies of the Athens Transport Group apply strict safety standards in compliance with the applicable legislation related to road means (buses and trolleybuses) and OSY facilities. At the same time, companies support the continuous education and training of employees, enhancing their professional skills and overall personal development and empowerment while conducting preventive periodic medical checks to ensure the suitability of movement personnel.

The Group also contributes to economic growth by providing high-quality mobility services, improving quality of life and enhancing culture and society, implementing actions that cultivate human resources, creating a sense of volunteerism and social contribution, and supporting humanitarian initiatives. Thus, it contributes to the work of recognized social institutions and organizations. Always focus on social contribution and promote the country's variety of history, culture, and folklore.

ESG Goals and Priorities

Below are presented the main strategic objectives (financial and non-financial) of the ESG (Environment, Society, Economy) priorities of Growthfund for the Athens Transport Group until 2024, with the base year 2021. Based on the ESG Sustainable Development pillars, the Group pursues the following:

- CO₂ emissions estimation & roadmap for alignment with the European Green Deal.
- Improvement of accessibility to public transport in Athens.
- Enhancing transparency on ESG topics.



Table 3: **Group Targets for the period 2022-2024**

Environment

Implementation Year	ESG Priorities	Response	Status
2024	<p>Use AI & ML* in preventive maintenance system for buses and trolleybuses</p> <ul style="list-style-type: none"> • Design, develop and operate an integrated preventive maintenance system with AI & ML technology in buses and trolleybuses. • With an average of more than 220 kilometres per vehicle per day, the system will significantly reduce CO₂ emissions. <p><i>* AI & ML: Artificial Intelligence, Machine Learning</i></p>	Removal from the circulation of old technology diesel vehicles (EURO1).	Ongoing
2024	<p>Transition to electrification</p> <ul style="list-style-type: none"> • New electric buses (OSY). <ul style="list-style-type: none"> ▶ Pilot evaluation of electric buses. ▶ Transitional plan of operation, facilities & human resources. ▶ Change management plan. • Installation of car charging stations in parking lots and depots of STASY. 	OSY is in the process of procuring 140 new electric buses and expects to receive them in 2024.	Ongoing
2022-2025	<p>Reduction of energy footprint in offices</p>	<ul style="list-style-type: none"> • Reduction of energy footprint of specific facilities after the modifications they will undergo to accommodate electric buses (parking, maintenance, charging). • Energy upgrade of OSY buildings (e.g. replacement of parking lots lighting with LED systems, treatment of liquid waste from workshops, lubricators, washing machines). 	Ongoing
2022-2024	<p>New low-emission vehicles</p> <p>Continuation of the tender procedures for the supply of new vehicles with anti-pollution technology (Compressed Natural Gas - CNG, electric).</p>	Evaluation of tender offers of the Ministry of Transport and Infrastructure. It has been declared the temporary contractor for the 200 CNG and the signing of the contract for the 100 CNG has been approved by the Court of Auditors.	Ongoing
2022-2024	<p>Consumption of natural resources</p>	<ul style="list-style-type: none"> • Data collection and drafting of specifications for the procurement of new bus washers, which use less water and manage waste with environmentally friendly processes. • Start the process of obtaining ISO 14001 certification (Environmental Management). The pre-audit has been scheduled, and the OSY will take the appropriate adaptation actions. 	Ongoing

2022-2024	<p>Energy, water and waste management</p> <ul style="list-style-type: none"> • Energy upgrade of facilities. • Installation of PV systems in the OSY parking lots. • Further consolidation of good practices in waste management (e.g. fleet recycling). • Wastewater management facilities at OSY parking lots. • Responsible water consumption. 	OSY has installed PV panels at Petros Rallis A/S facilities and has signed contracts with contractors to optimize wastewater and waste management.	Ongoing
2022-2024	<p>Environmental Management System Certification</p> <ul style="list-style-type: none"> • Development, implementation and acquisition of environmental certificate (i.e. ISO 14001, EMAS). • In 2020, OASA prepared a CO₂ emissions report. • Establishment of the above report as a tool for measuring and making relevant business decisions. 	OSY has initiated the procedures for the certification of Anthoussa's A/C according to the ISO 14001 Standard.	Ongoing
2022-2024	<p>Rolling stock reduction and braking power recovery on Line 1</p> <ul style="list-style-type: none"> • 12% less energy consumption than renovated rolling stock. • Energy savings of 15% through power regeneration during braking. 	Submission and approval of studies by STASY. The process of ordering equipment from the contractor is in progress.	Ongoing
2022	<p>CO₂ emissions estimation & roadmap for alignment with the European Green Deal</p>	The project was prepared in light of the institutional framework of the Green Deal and included a package of measures, actions, investments, and initiatives for the Group's companies, which will gradually lead to the green transition. The actions concerned the energy upgrading of buildings, the promotion of electrification and electromobility, the reduction of waste generation, the reduction of carbon footprint emissions, the technological upgrading of companies, the enhancement of digital connectivity, the support of urban upgrading actions and the promotion of sustainable mobility.	Completed
2022	<p>Promoting paper ticket reuse</p> <p>Awareness campaign for the reuse of multiple tickets for environmental purposes and the use of ATH.ENA CARD.</p>	The Group implemented an information campaign in collaboration with STASY & OSY by posting relevant material (video & posts) on social media, at Metro stations and inside buses & trolleybuses.	Completed
2022	<p>Integrated bus fuel management system</p>	<ul style="list-style-type: none"> • Replacement of liquid fuel tanks. • Volumetry/calibration of tanks. • Electronic control system. • The system will contribute to the improvement of OSY's environmental footprint. 	Completed

Table 3: **Group Targets for the period 2022-2024**

Society			
Implementation Year	ESG Priorities	Response	Status
2023-2024	Digital platform training and learning <ul style="list-style-type: none"> Digital platform for evaluating STASY's internal and external training and learning programs. Training for 3,000 employees (drivers and/or other customer service employees) on accessibility. 	A training program for first aid was implemented for all employees through the online E-Learning platform of STASY. The program combines practical training and leads to obtaining a 5-year certificate.	Ongoing
2023	Improving accessibility by upgrading and extending telematics Upgrade of OASA's website to improve accessibility for people with disabilities.	The OASA website upgrade was completed in order to display the content and information in a way that facilitates access by people with disabilities. OSY participates in the "Every stop, smart stop" action, which aims to place a QR Code at each stop and will refer to the telematics application of OASA, with LIVE data regarding the lines and routes of interest. In addition, it is planned to highlight vehicles that can serve disabled people with colour differentiation in the telematics application.	Completed
2023	Integration of new employees	Continuation of the recruitment process by the Public Employment Service (D.Y.P.A.) of persons for training at the premises of OSY.	Completed
2022-2024	Accessibility improvement program at selected Metro stations Implement an action plan in pilot plants, followed by wide-spread implementation.	The upgrade of the metro and metro station in Monastiraki has been completed, making it fully accessible for people with disabilities (the upgrade of the electric station in Kallithea is expected to be completed soon).	Ongoing
2022-2023	Continuous digital upgrades to online recharging of fare products for remote transactions	Completion of modification of the Automatic Fare Collection System (AFCS) and provision of online ticket purchases.	Completed
2022-2023	Employee engagement measurement survey	Implementation of research in STASY for the years 2022 and 2023 (where the company achieved incremental results of the confidence index) and taking action.	Completed
2022-2023	Preparation of the Board of Directors and Top Management of the Group and its subsidiaries for the implementation of ESG priorities	<ul style="list-style-type: none"> Attendance of recognised educational programs as well as trainings organized by Growthfund for its subsidiaries. Training of Compliance Officers. Training of Growthfund subsidiaries on ESG topics. 	Completed
2022	Managing the impact of the COVID-19 pandemic	<ul style="list-style-type: none"> Continuation of molecular and rapid tests for all employees, with a proportional frequency to the general epidemiological load. Procurement of personal hygiene items to protect against COVID-19. 	Completed

2022	Human Resources Development / Employee Training Continuation of training programs for all specialities and employees through the online platform OSY ACADEMY.	OSY has intensified the provided training programs to continuously train its employees and maximise utilization (see face-to-face seminars, OSY Academy, etc.).	Completed
2022	Organizational Restructuring	<ul style="list-style-type: none"> • Initiation of the process for obtaining ISO 45001 certification (Personnel Health and Safety). The pre-audit has been scheduled, followed by the OSY, which will take the appropriate adaptation actions. • Continuation of OSY's Family Benefits programs to employees (camps for employees' children, physically or mentally disabled children, students in Higher Education Institutions, day nurseries, etc.). • Continuation of benefit programs, in the form of gift certificates, during the holiday season. • Creation of a Regulatory Compliance Framework for OSY. • Collective Labour Agreement in all Group companies. 	Ongoing
2022	Supporting Society	<ul style="list-style-type: none"> • Continuation of programs for the provision of computer equipment to school units of OSY. • New project for the measurement of air quality inside the buses of OSY. • Participation in OSY social programs in the form of transportation services at major sporting and social events. • Continuation of reduced fare programs for vulnerable groups and free transportation to people with disabilities (with mobility problems) through the specialised service of OSY. • Installation of equipment for the free provision of internet access services (wifi) within the vehicles of OSY. • Provision of data by OSY on the specialised platform (O2HUB of Growthfund) that aims to gather information for the society. • OSY participation in an online reporting platform in the context of Regulatory Compliance. 	Ongoing
2021-2022	New stop overhangs to improve disabled access to buses and trolleybuses	In June 2022, OASA equipped 156 stops with high passenger traffic, with 409 special prefabricated overhangs, to facilitate embarkation/disembarkation in public transport. These stops are mainly located around Fixed Track Means (FTM) stations to create an integrated access framework.	Completed

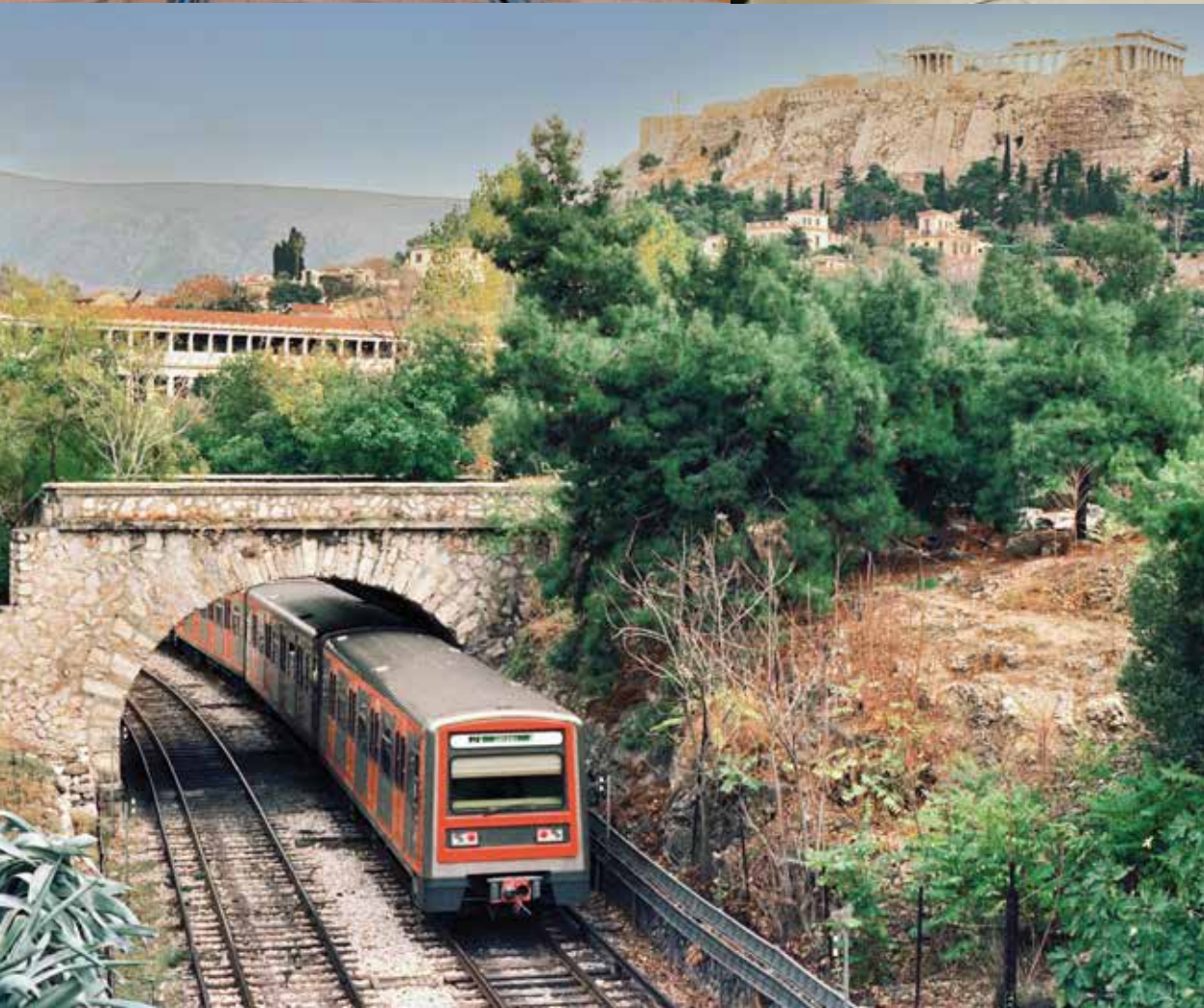




Table 4: **Group Targets for the period 2022-2024**

Governance			
Implementation Year	ESG Priorities	Response	Status
2023	Transparency & Disclosures <ul style="list-style-type: none"> Corporate Governance Statement in the Annual Results Report. Prepare sustainability disclosures based on appropriate standards, e.g. UN SDGs. 	Preparation of a Sustainable Development Report for the period 1.1.2022-31.12.2022 at the Group level.	Completed
2023-2024	Risk Assessment Conduct risk assessment and management.	The risk identification and assessment process by STASY and the formulation of the Risk Register and Action Plan have been completed and approved by the company's BoD. The process for OASA and OSY is ongoing.	Ongoing
2022-2023	Complaints Procedure	Implementation of the <i>Growthfund Whistleblowing Policy</i> and the "Safevoice" platform.	Completed
2022-2024	Embrace the new Corporate Governance Code for listed companies to the extent feasible. Implementation of Circular No. 60 of the Hellenic Capital Market Commission for the minimum 25% representation of women on the Board of Directors in the context of harmonization with the standards of listed companies as much as possible.	Establishment of a Committee for the Nomination of Candidate Members of the Board of Directors of subsidiary companies. The Group's companies have appointed new BoD members in accordance with the Growthfund requirement.	Completed
2022-2024	Monitoring	Quarterly reports of the Compliance Officer to the Board of Directors and establishment of a communication framework with Growthfund.	Ongoing
2022-2024	Improvement processes	<ul style="list-style-type: none"> Development of quality control system specifications for preventive vehicle maintenance in OSY. Implementation of the policy of entering into transactions with related Parties (third parties) by the OSY. Full integration into OSY's mydata OSY will fully operate the fuel management and control system. (PROMIS) Improve the tender procedures by the Procurement Directorate to reduce the completion time from 9-12 months to 4-7 months for large tenders by OSY. 	Ongoing
2022-2024	Digital transformation	<ul style="list-style-type: none"> Initiation of Cyber Security awareness and information actions. Create digital transformation indicators for all Growthfund companies. 	Ongoing

2021-2024	Independence of the Board of Directors	<ul style="list-style-type: none"> • Implementation of Law 4706/2020 regarding independence. • Distinction of roles and responsibilities: Non-executive position of Chairman of the BoD • All members of the Board of Directors sign a commitment of absence of conflict of interest (and/or declaration of independence accordingly) in a form provided by Growthfund. 	Ongoing
2021-2024	Third-party control	Implementation of a procedure for all partners and suppliers (based on the Growthfund procedure).	Ongoing
2021-2024	Business Ethics <ul style="list-style-type: none"> • Establish an effective ethics & compliance program, new policies and procedures, including those provided by Growthfund • Training on Business Ethics & Regulatory Compliance. 	<ul style="list-style-type: none"> • OASA has established and posted on its website the Code of Ethics & Professional Conduct and the policies: Reporting, Anti-Corruption & Bribery and Against Violence & Harassment at Work. Regarding Business Ethics & Compliance training, in 2022, the training of Managers was completed. • OSY has posted and communicated the compliance policy and code of conduct to employees. The same is expected with the other policies defined by the Growthfund. At the same time, he has already completed seminars for managers on Business Ethics & Regulatory Compliance. • STASY has posted on its internal website, in the field "Regulatory Compliance", its Policies. It has completed the training of all its executives and has started the face-to-face training of its employees. The training will also take place through an electronic platform. 	Ongoing

2.1 Management of Sustainable Development Issues

GRI 2-12 (a, b-i), GRI 2-13 (a)

The supervision and management of ESG topics, including risks and opportunities, is carried out at various levels with the Boards of Directors (BoD) of the companies of the Athens Transport Group. Approve the Group's Business Plan, which includes the Sustainable Strategy, as well as individual actions related to the sustainability pillars.

At the same time, the Boards of Directors of the companies are informed about the results of studies and actions related to the sustainability pillars, such as the carbon footprint study and the passenger satisfaction study. In addition to the members of the Board of Directors, the executives of the Senior Management of the companies, as well as employees of the Group, participate in group cooperation groups that have been established, such as, among others, the Corporate Transformation Action Team and the Passenger Experience Team, undertaking sustainable development actions, such as conducting studies to manage the Group's impact both on the external environment (environmental footprint assessment, roadmap for harmonization with the Green Deal, passenger satisfaction study) and on the internal environment (employee satisfaction survey).

In addition, senior management executives per company consult with stakeholder groups and inform the members of the respective Board of Directors of their views, which are considered when drafting policies and making decisions concerning stakeholder groups on a case-by-case basis. In addition, for the effective management of sustainability topics, the internal auditor identifies risks and communicates them to the Board of Directors of each company through the Audit Committee, with the Board of Directors of the Group companies validating the internal auditor's report and taking measures to mitigate risks.

2.2 Stakeholder involvement

GRI 2-29

Athens Transport Group seeks to maintain continuous and effective communication with all interested parties to record any concerns and needs that arise and communicate information about its activities. Regular consultation, communication and dialogue with stakeholders aims to understand their interests, expectations and needs better and identify topics related to sustainable development that need to be resolved by the Group.

The term stakeholders is defined as individuals or groups whose interests may be affected by the Group's activities. For the Group the main stakeholder groups are the following:

- Senior Management
- Shareholders
- Employees
- Governance Bodies and Independent Authorities
- Suppliers and Partners
- Business Community and Sectoral Bodies
- Passengers
- Business Community
- Local Communities
- Academic and Research Community
- NGOs
- Mass Media

The companies of the Athens Transport Group aim at a constructive and systematic dialogue with all stakeholders to develop, shape and maintain long-term relationships of trust and transparency. The following table prioritizes and categorizes stakeholders according to their impact and influence on the operations of the Athens Transport Group. At the same time, the methods of consultation and the frequency of consultation with them are recorded. In order to identify the Group's stakeholders, a detailed mapping was carried out as part of the Materiality Analysis process.

Table 4: Group stakeholder groups and ways and frequency of their participation

Stakeholder Group	Means of Communication	Communication Frequency
Senior Management (Management of STASY and OSY)	<ul style="list-style-type: none"> • Telephone contact • Email correspondence • Meetings 	Continuous
Shareholders	<ul style="list-style-type: none"> • Monthly Report to Growthfund • Email correspondence • Meetings 	Continuous
Employees	<ul style="list-style-type: none"> • Email correspondence • Meetings • Letters • Reports (upon request) 	Continuous
Governance Bodies and Independent Authorities	<ul style="list-style-type: none"> • Email correspondence • Meetings • Letters • Reports (upon request) 	Monthly
Suppliers and Partners	<ul style="list-style-type: none"> • Meetings • Email correspondence 	Weekly
Business Community and Sectoral Bodies	<ul style="list-style-type: none"> • Email correspondence • Meetings • Participation in forums and conferences • Events 	On occasion
Passengers	<ul style="list-style-type: none"> • Audience line 11185 • Chatbot, submission of complaints through the OASA website • Questionnaires (satisfaction survey) 	Daily
Local Communities	<ul style="list-style-type: none"> • Email Meetings 	Monthly and on occasion
Academic and Research Community	<ul style="list-style-type: none"> • Email correspondence • Meetings / Cooperation in the framework of Research Projects 	Monthly and on occasion

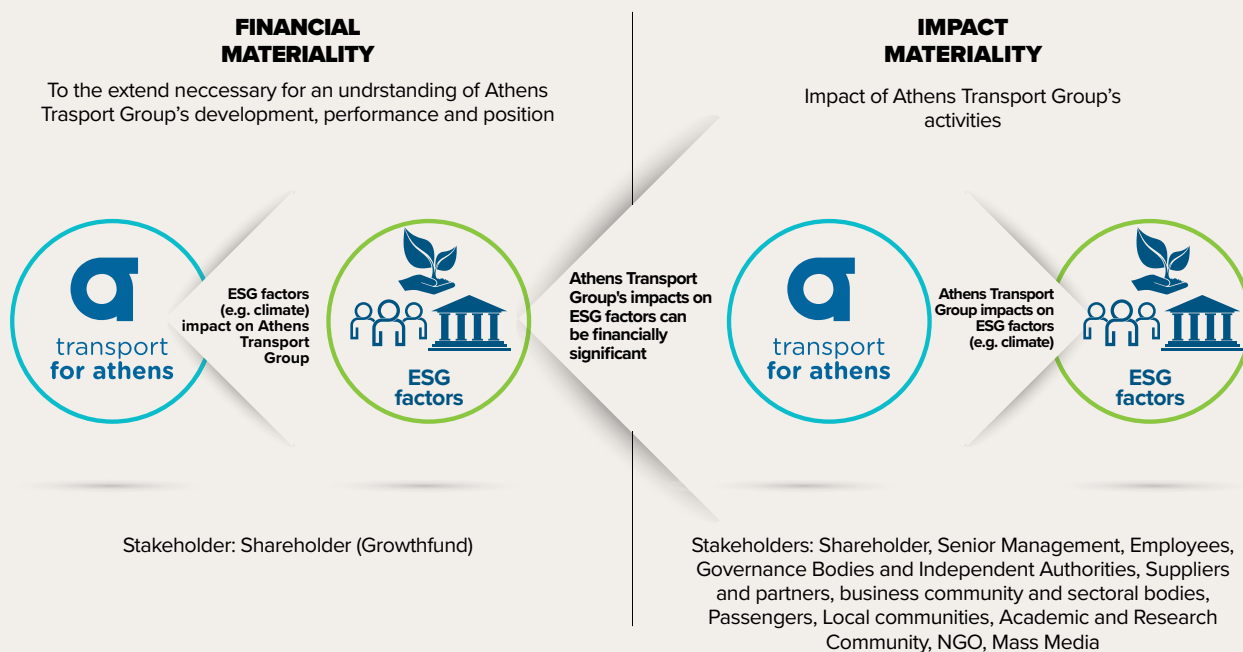
NGO	<ul style="list-style-type: none"> • Email correspondence • Meetings • Letters • Press releases 	Monthly and on occasion
Media	<ul style="list-style-type: none"> • Press releases • Articles • Interviews 	Weekly

2.3 Double Materiality Analysis

GRI 3-1

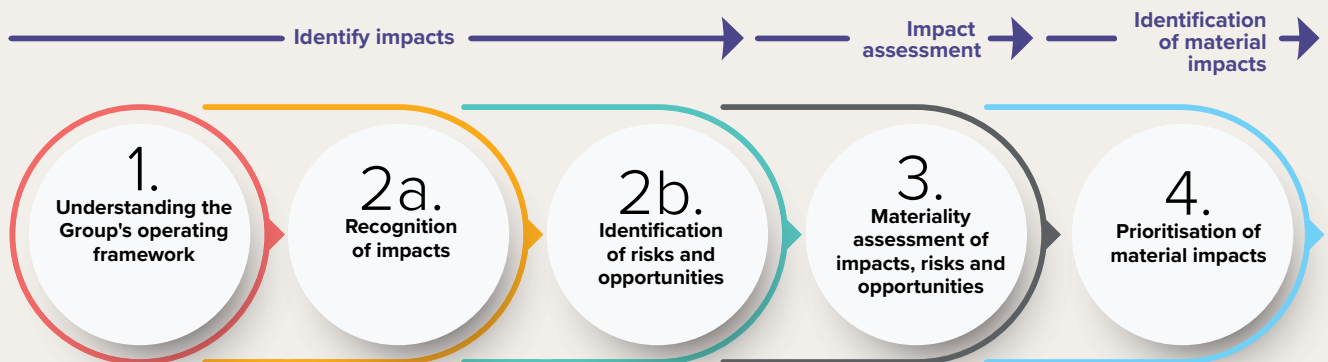
In 2023, Athens Transport Group conducted for the first time a Double Materiality Analysis (inside-out & outside-in) following the European Sustainable Development Reporting Standards (ESRSs – Sector agnostic topical standards), as well as the international Sustainable Development Reporting Standards GRI (GRI Standards 2021). The concept of dual materiality assesses, on the one hand, the impacts of the company on the environment, society and the economy, including the impacts on human rights (impact materiality), on the other hand, the financial risks and opportunities arising from the environment and society to the company (financial materiality), thus affecting its business value, i.e. the economic value created through its activities, in the short and medium to long term.

Graph 2: Double materiality concept





The Double Materiality Analysis was conducted in four phases:



Phase 1

Understanding the operating framework of Athens Transport Group

- **Overview of the Group's business model (internal environment) and external environment (e.g. similar companies):**

From documents and available material, aim to understand the Group's business strategy and operating model through identifying key stakeholders and understanding and mapping its business relationships with stakeholders to identify actual and potential impacts of the organization, as well as potential financial risks and opportunities.

Phase 2

Identification of Impacts, Risks and Opportunities

- Identification of the Group's positive and negative (actual and potential) impacts on the economy, the environment and society, including impacts on human rights, as they resulted from its operation and business relationships, or were highlighted as significant by sustainable development models and similar organizations.
- Identification of the Group's financial risks and opportunities due to environmental, social or governance topics, taking into account positive and negative (actual and potential) identified impacts in relation to the European Sustainable Development Reporting Standards (ESRSs – Sector agnostic topical standards).

Phase 3

Assessment of Impacts, Risks and Opportunities

- **Conducting a double materiality survey:**

A survey was conducted with the participation of Senior Management, employees and external stakeholders regarding the assessment of environmental, social and economic impacts, including impacts on human rights and financial risks and opportunities (taking into account the existing Growthfund Risk Management Policy), related to the Group's operation.

Criteria for assessing positive (actual) impacts:

- Scale, i.e. how beneficial the impact is or could be.
- Scope of the impact, i.e. how extensive the impact is.

Criteria for assessing negative (actual and potential) impacts:

- Scale of impact, i.e. how severe the impact is.
- Scope of the impact, i.e. how extensive the impact is.
- Irremediable character of the impact, i.e. how difficult it is to manage or repair the damage caused.
- Likelihood of impact, i.e. what is the probability that the impact will occur.

Financial risk and opportunity assessment criteria:

- Likelihood.
- Potential magnitude of the economic impact.

- **Collection and analysis of evaluation results:**

Following the completion of the process, responses were collected and analysed to determine the results of the assessment of impacts, risks and opportunities.

Phase 4

Impact Prioritisation and Validation

GRI 2-14

Materiality threshold:

The threshold for identifying impacts, risks and opportunities as material topics has been defined.

Matching the impacts of risks and opportunities on sustainable development topics:

Impacts and risks/opportunities were grouped under sustainable development topics, as illustrated in the table below.

Validation of a list of material topics by Senior Management.

Identified Impacts, Risks and Opportunities

During the double materiality analysis process, 17 actual positive, 7 actual negative and 16 potential negative environmental, social, and economic impacts were identified, as well as 25 financial risks and 21 financial opportunities, presented in more detail in the table below.

THEMATIC UNIT	Recognized Topics	Recognized Sub-Topics	Impacts		Financial Risks	Financial Opportunities
			Actual	Potential		
ENVIRONMENT	Climate change	Adaptation to Climate Change			●	●
		Climate Change Mitigation / Energy	+		●	●
	-					
	Pollution	Air pollution		-	●	
		Water pollution		-	●	
		Soil contamination		-	●	
	Water and marine resources	Water	+		●	●
	-					
	Biodiversity and ecosystems	Direct impact factors on biodiversity loss (Climate change, Land use change, Pollution, Direct exploitation)	+	-	●	●
	Circular economy	Resource inputs, including resource use	+		●	●
			-			
		Waste	+		●	●
			-			

SOCIETY	Intimate Labour potential ³	Working conditions (working time, adequate wages)				
		Freedom of association and collective bargaining				
		Health and safety at work / Work-life balance				
		Diversity, equal treatment and equal opportunities for all				
		Training and skills development				
		Child labour / Forced labour				
	Employees in the value chain	Working conditions and human rights in the value chain				
	Affected communities	Economic, social and cultural rights of communities related to land use, security, adequate housing, adequate food, clean water and sanitation				
		Civil and political rights of communities in relation to freedom of expression				
SOCIETY	Special topics	Urban mobility				
	Consumers and end users	Information-related impacts on consumers and/or clients and/or end-users on privacy, freedom of expression and access to quality information				
		Personal safety of passengers and/or end-users				
	Social inclusion of consumers and/or end-users	Social inclusion of consumers and/or end-users				
Social inclusion of consumers and/or end-users	Responsible marketing practices					
GOVERNANCE	Business behaviour	Business culture / Protection of whistle-blowers / Corruption and bribery				
		Management of supplier relations, including payment practices				

Subsequently, based on the double materiality analysis survey results, the following thematic areas of positive and negative (actual and potential) impacts, as well as financial risks and opportunities, were prioritized by the Group's Senior Management as material.

3. The term "Own workforce" includes all employees of the companies of the Athens Transport Group (OASA, OSY and STASY), regardless of hierarchy and function.

Tables 6 & 7: **Prioritized Positive and Negative Impacts**

Positive Impacts		
1	Climate Change Mitigation / Energy	A
2	Working conditions (working time, adequate wages)	A
3	Factors of direct impact on biodiversity loss (climate change, land use change, pollution, direct exploitation)	A
4	Waste	A
5	Health and safety at work / Work-life balance	A
6	Personal safety of passengers and/or end-users	A
7	Impacts related to the information available to passengers and/or end-users on privacy, freedom of expression and access to quality information	A
8	Resource inputs, including resource use	A
9	Urban mobility	A

Negative Impacts			
1	Climate Change Mitigation / Energy	A	
2	Air Pollution		P
3	Pollution of soil		P
4	Water pollution		P
5	Factors of direct impact on biodiversity loss (climate change, land use change, pollution, direct exploitation)		P
6	Personal safety of passengers and/or end-users	A	
7	Health and safety at work / Work-life balance	A	
8	Work conditions (working time, adequate wages)		P
9	Freedom of association and collective bargaining		P
10	Training and skills development		P
11	Diversity, equal treatment and equal opportunities for all		P
12	Working conditions and human rights in the value chain		P

A = Actual Impacts & P = Potential Impacts

Tables 8 & 9: **Prioritized Risks and Opportunities**

Risks	
1	Work conditions (working time, adequate wages)
2	Climate change mitigation / Energy
3	Personal safety of consumers and/or end-users
4	Business culture / Whistle-blower protection / Corruption and bribery

Opportunities	
1	Training and skills development
2	Business culture / Whistle-blower protection / Corruption and bribery
3	Urban mobility
4	Work conditions (working time, adequate wages)
5	Climate change mitigation / Energy
6	Personal safety of consumers and/or end-users

The above thematic areas were then grouped into the following material topics for a more effective and complete depiction of the Group's management approach and performance and form the basis for determining the content of this Sustainable Development Report, which the Group's Management has validated.

Material Topics

GRI 3-2

Table 10: **Material topics⁴ of Athens Transport Group**

Material topics for the Sustainability Report				
N/A	Material topic	Impact	Risk / Opportunity	UN Sustainable Development Goals
1	Climate change mitigation (including power consumption)	I	RO	
2	Circular economy (including resource use and waste management)	I		
3	Working conditions and employee development (including working time, wages, training and skills development, freedom of association and collective bargaining, health and safety at work, diversity and equal opportunities)	I	RO	 
4	Working conditions and human rights in the value chain	I		 
5	Safety of passengers and users	I	RO	
6	Customer and user rights and privacy (including customer service, freedom of expression and access to quality information)	I		
7	Sustainable urban mobility (including accessibility to mobility and transport infrastructure)	I		
8	Business ethics (including business culture / Protection of whistle-blowers / Corruption and bribery)		RO	

I = Materiality of impacts, R/O = Financial materiality (Risk/Opportunity)

4. Note: Regarding the impact "Direct impact factors on biodiversity loss (Climate change, Land use change, Pollution, Direct exploitation)", the Management considered that it does not constitute a significant impact and was not included in the Sustainable Development Report.

03

Environment



3.1 Climate change

Material topic: Climate change mitigation



GRI 3-3

Impacts	
Actual	Positive
	From the operation of the fixed track means an alternative use of private cars for transportation within the city and through investments and actions that reduce greenhouse gas emissions.
	Negative
	Energy consumption from fossil fuels and greenhouse gas emissions into the atmosphere.
Financial Opportunities	
From the reduction of greenhouse gas emissions and energy savings.	
Financial Risks	
From the cost of energy to the cost of any requirement to renew equipment and electrify the activities of OSY.	

According to the European Commission's "Climate Action" data, the Transport Sector is responsible for about 1/4 of emissions in the EU and is the main cause of city air pollution. The contribution of Athens Transport Group to climate change mitigation is crucial, as the use of Public Transport avoids the movement of approximately 800,000 cars per year. In its 1st environmental footprint report published in 2021, the Group documented that "theoretical" removals are higher than the Group's emissions and, therefore, the environmental benefit arising from the Group's operation is greater than if the Group did not provide the transport project.

In this context, the Athens Transport Group implements climate change mitigation actions to assist and enhance the effort it has undertaken to reduce emissions from its activities and improve its environmental profile by promoting the use of public transport. The Group aims to introduce environmental parameters into the decision-making process, identify areas for improvement, plan targeted actions, but also highlight the contribution of public transport to the improvement of the urban environment to take advantage of the opportunities presented for lower operating costs, avoidance of financial fines or sanctions that are expected to be imposed on businesses that will not comply with the requirements created by the regulatory framework.

Carbon footprint reduction actions

GRI 302-1 , GRI 305-1, GRI 305-2

TR-RO-110.1., TR-RO-110a.3.

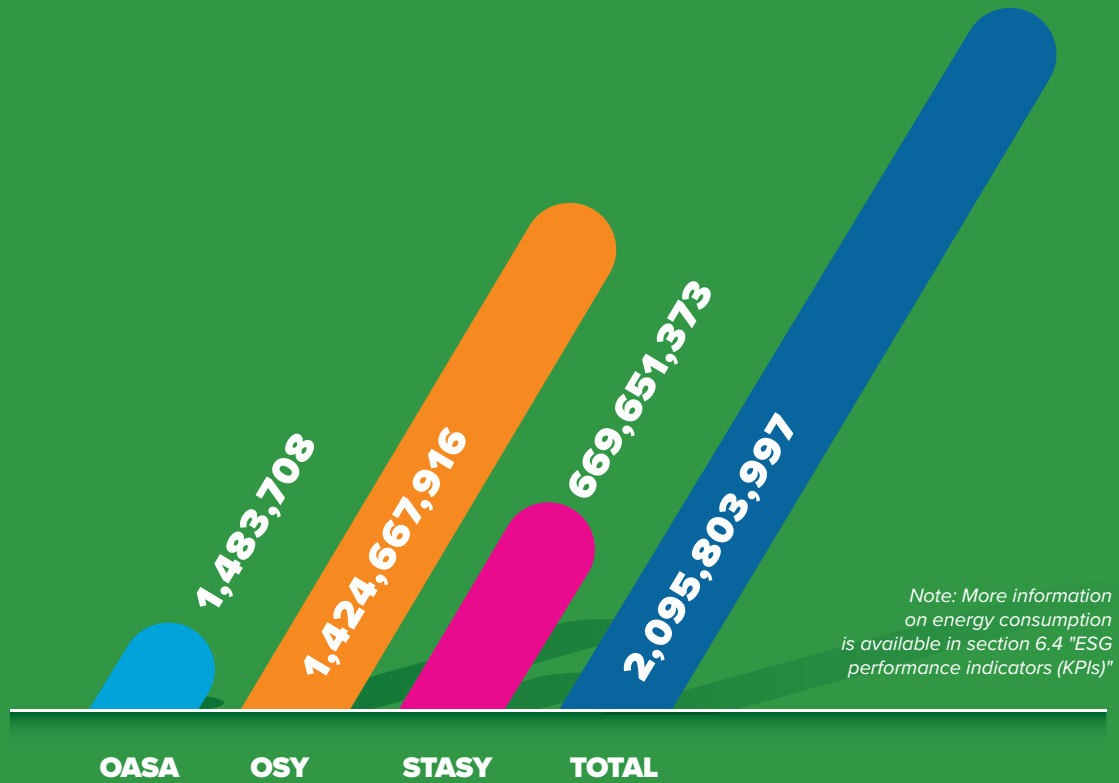
Internal Performance Indicator: Use of refrigerants

The Group has proceeded with the implementation and planning of actions for the energy upgrade of offices and facilities, the promotion of electrification and electrification of the vehicle fleet, the reduction of waste generation, the technological upgrade of companies, the enhancement of digital connectivity, the support of urban upgrading actions and the promotion of sustainable mobility. Specifically, in 2022, the Group proceeded with projects to reduce the energy footprint of specific OSY offices, to replace the lighting of the parking lots with LED systems and to changes the reception (parking, maintenance, charging) of electric buses.

In 2022, total energy consumption at the Group level amounted to 2,095,802,996.95 MJ. More specifically, the majority of energy consumed is carried out by OSY 67.98%, with STASY to follow at a rate of 31.95%, while OASA consumes only 0.07% of the total energy, as its activities are limited to administration buildings. Also, none of the Group's companies used energy from renewable sources. Fuel consumption amounted to 1,339,797,406.15 MJ, with all Group companies using natural gas in their activities, where its usage rate for STASY amounted to 51.38%, in OSY 18.49% and OASA 12.87%.



Figure 1:
Energy consumption (MJ)



Note: More information on energy consumption is available in section 6.4 "ESG performance indicators (KPIs)"

Scope 1 emissions amounted to 112,660.48 t CO₂e, while Scope 2 emissions (market based) amounted to 112,161.18 t CO₂e.

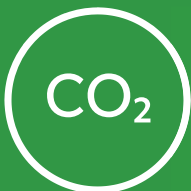
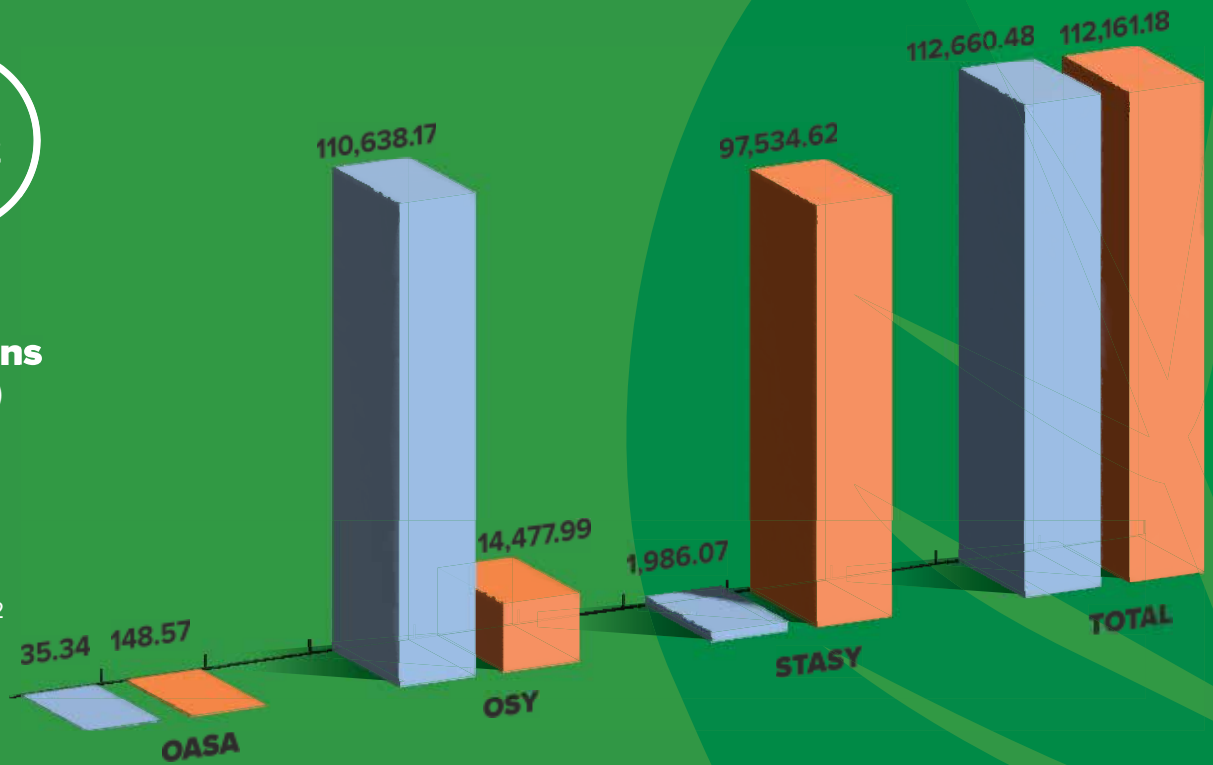


Figure 2:
Annual Emissions (t CO₂e)

- Scope 1
- Scope 2



Note: More information on greenhouse gas emissions is available in section 6.4 "ESG Performance Indicators (KPIs)"

In 2022, the Group had 11.95 t of refrigerants, not all of which were harmful to ozone, their use was carried out by 93.87% by OSY. (11.22 t), mainly due to its fleet of vehicles. The remaining quantity came from STASY (0.73 t), with the OECD having minimal emissions of ozone-depleting substances (0.00035 t).

More specifically, the substances included in the calculation of emissions per company are as follows:

Table 11: Refrigerant use	
Company	Refrigerants
OSY	R-134A, R-407C, R-410A, R-22, R-32
STASY	R-407C, R-134A, R-410A
OASA	R-410A

More environmentally friendly public transport

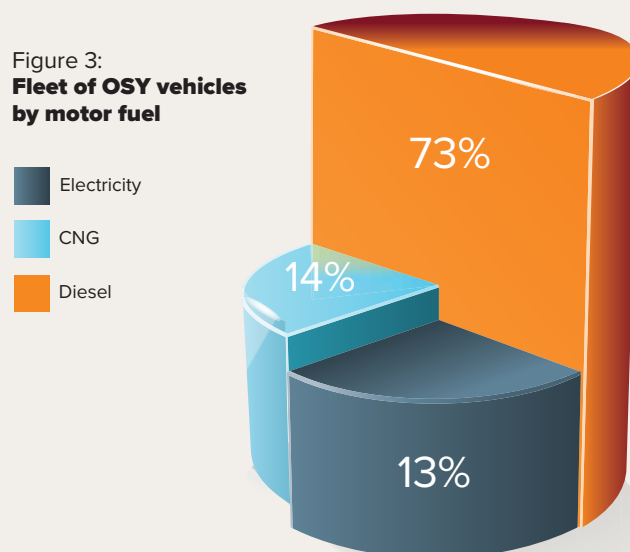
The benefits of fixed track means are highlighted in the most emphatic way by recording environmental data and road accidents in the Attica basin. The results have been calculated using assumptions made by Attiko Metro, the Association of Greek Transport Engineers, OASA, IENE (Institute of Energy of Southeast Europe) and CRES (Centre for Renewable Energy Sources). It has been estimated that the energy consumed per passenger and car transportation reaches 9.76 kWh and the CO₂ production per passenger and car movement 2.55 kg.

The use of the Metro and the Tram contributes to the reduction of CO₂ and other pollutants in the city's atmosphere since trains and vehicles, as electric means, do not pollute locally, and despite the consumption of electricity, the impact, compared to the use of cars, is significantly less. The Group recognizes that the reduction of air pollutant emissions in Attica will be achieved by cultivating the corresponding culture among passengers. In particular, to encourage transportation by urban transport, STASY has installed bicycle parking spaces outside the Metro stations and supports the "Car Free Day" with communication promotion of the possibility of transporting bicycles by MTA.

In addition, the Group, through its subsidiary OSY, maintains a trolleybus fleet, which is an environmentally friendly and silent means of transport, as trolleybuses are more energy efficient, emit fewer air pollutants per kilometre travelled compared to conventional-thermal buses, thus contributing to the reduction of greenhouse gases. Also, OSY has buses powered by Compressed Natural Gas (CNG), with an improved environmental footprint compared to diesel, given the non-emission of fine particulate matter (PM). Furthermore, the Ministry of Infrastructure and Transportation conducted an open tender to renew the urban bus fleet for Athens and Thessaloniki. Through this procurement, they will join the OSY fleet of 140 electric vehicles and 300 CNG in 2024, replacing older technology vehicles. In addition, OSY integrated 292 used vehicles into its fleet through a leasing process while renewing and improving the age of the vehicles in its fleet. In 2022, the distribution of OSY's vehicles per motor fuel was as follows:

Finally, the Group seeks to reduce the environmental impact of its vehicles by providing training to OSY drivers on energy-efficient and ecological driving ("ecodriving").

Figure 3: Fleet of OSY vehicles by motor fuel



3.2 Resource and Waste Management



Material topic: Circular economy

GRI 3-3

Impacts	
Actual	Positive
	<ul style="list-style-type: none"> • Through the efficient use of natural resources, such as reducing paper use. • From rational waste management to the implementation of recycling practices and cooperation with properly licensed bodies.
	Αρνητικές
	<ul style="list-style-type: none"> • There is a lack of systematic management of natural resources and the absence of binding terms to suppliers.

The activities of the Group's subsidiaries require materials necessary for the realization of their transport work and inevitably generate waste. In the context of compliance with environmental terms and legislation and for the proper environmental management of waste generated by their facilities, the Group's companies cooperate with appropriately licensed waste management bodies. In 2022, OASA implemented information campaigns on social media to promote the recharging of multiple tickets and the use of ATH.ENA CARD, mainly for environmental reasons, proceeded to the digitization of its archives and mainly the archives of the Central Protocol, through the "Papyrus" Program. Also, OASA proceeded to draft specifications for supplying new bus washes for OSY, which will consume less water.

The OSY started the ISO 14001 Environmental Management Certification process by realising a pre-audit. STASY has adopted paper-saving practices, such as the operation of internal websites for the electronic distribution of documents from the company's Central Protocol and the electronic management of orders, as well as the abolition of local and the use of central printers, with the ability to scan documents and set up two-sided printing on all computers. In the next step, the full digitization of the Central Protocol is foreseen so that printing is not required at any stage.

Waste Management

GRI 306-1 (a-i), GRI 306-2 (b,c), GRI 306-3

Waste such as lubricants and oils resulting from the maintenance of OSY vehicles, especially those of older technology, is collected by an authorized partner, using appropriate private trucks and drivers trained for this purpose and then disposed of to licensed companies. Also, licensed management and recycling companies collect and manage old, useless, empty metal barrels, used tyres, scrap metal materials, and old accumulators (vehicle batteries).

In addition, STASY maintains long-term cooperation with approved Alternative Management Systems for the management of waste electrical and electronic equipment, such as lamps, electronic boards, computers and power tools, portable batteries and Ni-Cd accumulators, while it has concluded contracts through tenders with licensed companies for the management of Waste Lubricating Oils (WLO), lead acid accumulators, non-hazardous waste, such as metal chips, metal objects and cables and hazardous waste such as hazardous absorbents, packaging, containers and sprays. Based on the above collaborations, suitable containers have been developed per waste type in all the company's parking lots for collection -per type- at source, as it submits an annual waste report through the Electronic Waste Registry (HMA) also, in STASY materials such as paper, batteries, aluminium, wooden pallets, accumulators, rails and wooden sleepers are recycled.

For 2022, no waste generation and management data is available at the Group level. OASA and OSY have developed internal data collection procedures to respond to a subsequent Sustainable Development Report. STASY, within the reference year, generated 859,62 t of waste, recording an increase of 8.43% compared to 2021 (792.76 t), of which 96.17% concerned non-hazardous waste and the remaining 3.83% was hazardous waste.

Integrated Rewarding Recycling Program

STASY, in collaboration with the National Collective System "Rewarding Recycling", implements the "Integrated Rewarding Recycling Program in Fixed Track Means". The purpose of this innovative program is:

- To inform and sensitize citizens who circulate daily by means of fixed track (Metro and Tram) about the benefits of recycling in environmental protection.
- To allow passengers to recycle packaging -and not only- in the "Rewarding Recycling Houses" in central public transport stations.

The program offers a reward fee of €0.03 per package to passengers and citizens. The price is intended either for free purchases at partner stores or to enhance the provision of daily "Meals of Love" by the charity organization of the Holy Archdiocese of Athens "Apostoli".

The "recycling train" was presented within the program's framework, which conveys the message of recycling and environmental protection and is an advertising initiative. Moreover, the Athens Metro is the second in the world and the first in Europe to implement a packaging recycling program at stations. Thus, STASY is our country's first Public Utility Company to fulfill the legal obligation to recycle packaging⁵.

5. Law 4496/2017





04

Society



4.1 Labour Relationships and Practices

Material topics: Working conditions and employee development

Working conditions and human rights in the value chain



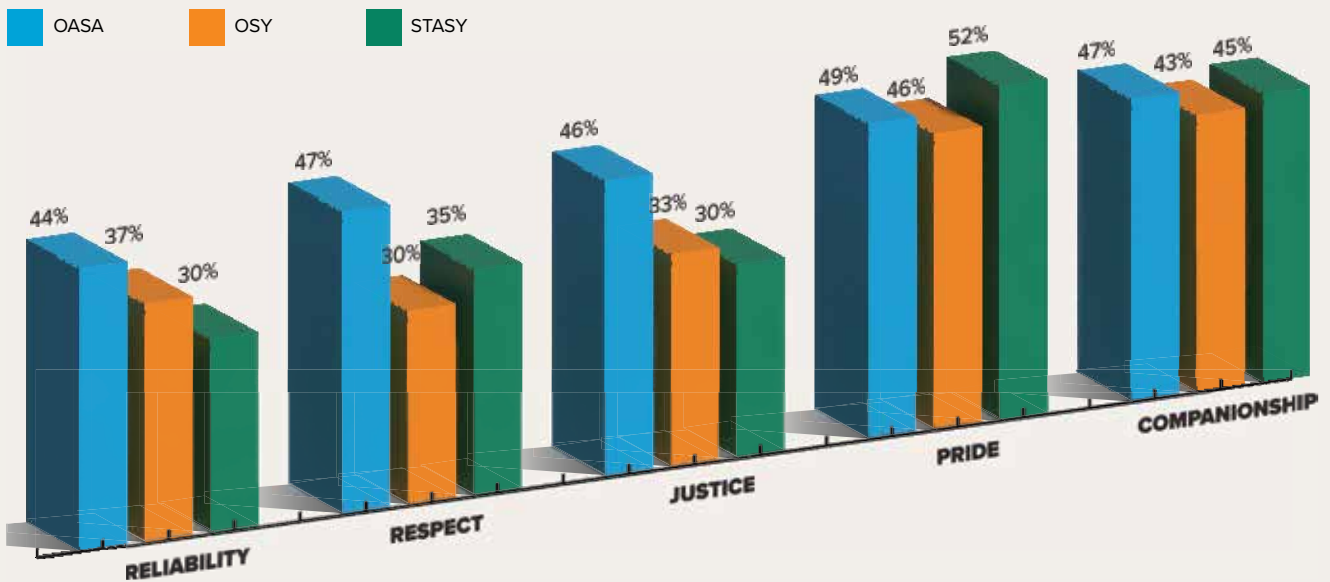
Working conditions and employee development Impacts	
Actual	<p>Positive</p> <ul style="list-style-type: none"> Through productive work in conditions of human dignity and the implementation of policies on health and safety at work.
	<p>Negative</p> <ul style="list-style-type: none"> Existing negative impacts associated with accidents at work in OASA's subsidiaries
Potential	<p>Negative</p> <ul style="list-style-type: none"> Failure to implement established policies and procedures that create working conditions that do not promote freedom, equality, safety and human dignity, lead to non-respect of information, consultation and participation rights, gender inequality, ethnic/racial discrimination, ageism or any other kind of discrimination in the workplace and access to quality education and lifelong learning opportunities; exclusively and unfairly.
Financial Opportunities	
<ul style="list-style-type: none"> From increased profitability due to productive work in decent conditions, attracting high-level executives and high employee retention and the development of employees' skills through technology. 	
Financial Risks	
<ul style="list-style-type: none"> From the inability to attract qualified executives due to uncompetitive salaries, the loss of revenue in cases of closure due to employee strikes, and the cost of any fines and sanctions and the negative reputation in non-compliance with labor laws on working hours. 	
Working conditions and human rights in the value chain Impacts	
Potential	<p>Negative</p> <ul style="list-style-type: none"> Failure to implement established policies and procedures creates working conditions that do not promote freedom, equality, security and human dignity.

Employee satisfaction and morale are integral parts of any company's culture that promote sustainable development and are among the most critical factors for its success. The Group recognizes the importance of working conditions and seeks continuous interaction with employees to implement corrective actions in a timely manner and improve the daily working life of its people.

In this context, in 2022, the Group distributed the Great Place To Work (GPTW) questionnaire to all employees of the Group's companies to reflect their views. The initiative aimed to record employees' proposals and then launch actions to improve the effectiveness of corporate practices, enhance the quality of relationships and trust within the Group and to establish a systematic two-way communication channel between employees and management to avoid financial risks related to low employee satisfaction, such as loss of revenue in cases of strike action.

Employees were asked to evaluate five critical dimensions of the working environment. The Graph below shows the percentage of positive ratings, i.e. employees who stated "Often true" or "Almost always true" per work dimension.

Figure 4: **Employee evaluation by occupational dimension of GPTW survey 2022**



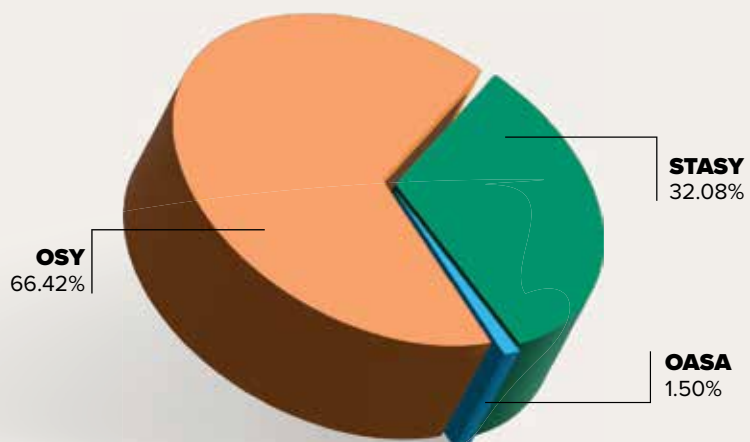
Human resources data

GRI 2-7, GRI 2-8 (a,b) , GRI 2-30

The Group monitors and records all its employees, on an annual basis, by gender (women, men, other), by type of contract (indefinite or fixed-term), type of employment (full-time and part-time). The area of activity of all human resources is Attica.

In 2022, human resources amounted to 7,228 compared to 7,443 employees in 2021, showing a decrease of 2.89% due to retirements from all three companies of the Group, with the majority of employees employed in OSY, 66.42% (4,801 employees). Women accounted for 9.92% (717 employees) of the total human resources, which is attributed to the nature of the Group's activities, and almost all human resources, 99.63% (7,201 employees), were permanent, with OSY employing 27 temporary employees. At the same time, the number of workers who were not employees of the group amounted to 60 and included guarding, cleaning, consulting services, and special associates/consultants.

Figure 5: **Athens Transport Group employee distribution**



For the calculation of the number of employees, the "headcount" methodology was applied on 31.12.2022 of the respective year, while all employees with an employment contract were included in the recording. For 2022, all human resources were covered by Collective Labour Agreements (CLAs).

Benefits

GRI 2-21 (a,c) , GRI 401-2 (a-i,a-ii,a-iv), GRI 405-2

In 2022, the 3 CLAs concluded between employees and the 3 management of the Athens Transport Group were implemented. They actively highlight and ensure the cooperation and commitment between employees and companies over time, representing an important tool for regulating issues related to working conditions, employees' rights and obligations, and the employer's rights and obligations.

The OASA CLA has included the provisions of the current legislation on work-life balance for parents and carers (parental leave, paternity leave, absence for reasons of force majeure, carer's leave, etc.) and has made arrangements for leave related to family protection (childcare leave, leave due to illness of a child or other dependent member, leave for hospitalization of a child, leave due to severe diseases of children, part-time work for parents of children with disabilities, etc.).

The adoption of the above measures and their incorporation with appropriate additions of benefits (e.g. support for the further training of all employees according to their field of work, possibility of using crèche and kindergarten services, etc.) within the framework of the Collective Agreement reflects the social sensitivity of OASA and the recognition of the importance of employees in modern working reality. The agreement creates a balanced working environment that serves the interests of employees and the employer, enhancing the positive dynamic between the two sides.

In the same context, the CLA of OSY meets legislative requirements by providing parental leave, paternity leave, absence for reasons of force majeure, and carer's leave to ensure the necessary work-life balance of employees. Also, the company offers licenses related to family protection. Such as childcare leave, leave due to illness of a child or other dependent member, childcare leave due to severe diseases of children, reduced hours for parents of children with disabilities, coverage of driving license renewal costs of Traffic Personnel (drivers), etc.

Also, OSY supports training its employees according to their work and provides the opportunity to use nursery - kindergarten and camp services. In the CLA for the period covering the year 2022, all benefits deriving from previous CLAs are reported, while at the same time benefits related to:

- Daily meals for all employees.
- The reinforcement of the monthly coverage of attendance at nursery and kindergartens.
- Women employees were given an extra day of paid leave for annual gynaecological check-ups.
- The production of the Transportation Project.

Finally, for STASY, the new CLA is the pinnacle of previous CLAs, as additional non-wage benefits were added, and years of service issues were resolved. Its signature created a positive relationship between employees and the company, cultivated a sense of trust and promoted a healthy working environment. Some of the non-wage benefits that are now granted to its employees are the following: use of crèche and kindergarten services with the payment of a monthly amount per child, scholarship system at all levels of education for the children of employees and the employees themselves, coverage of costs for hosting the children of employees in a camp of ISAP or private ones, Expenditure for cleaning work uniforms, childbirth allowance, annual financial support for a disabled child, student-school allowance, purchase of military service and purchase of mothers' pensionable time. In addition, the legislative provision of an insurance program covering preventive and diagnostic tests is in progress, as well as the issuance of a Joint Ministerial Decision for granting dangerous and unhealthy work.





Regarding the remuneration ratio of CEO / Employees⁶ for 2022, it stood at 4.01:1 for OASA, 2.81:1 for OSY, and 3.32:1 for STASY.

Figure 6: **Remuneration ratio of the CEO / Employees of Athens Transport Group**

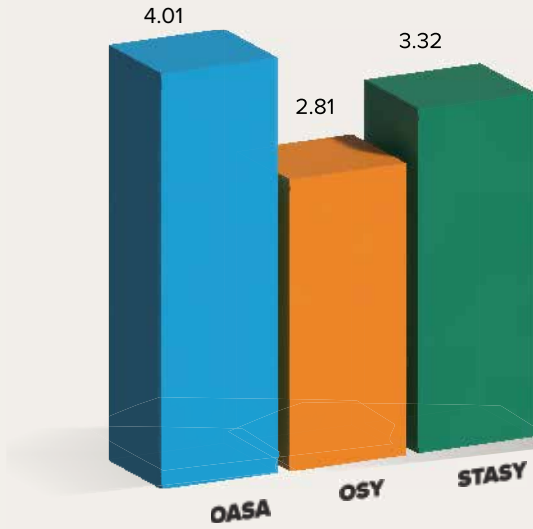
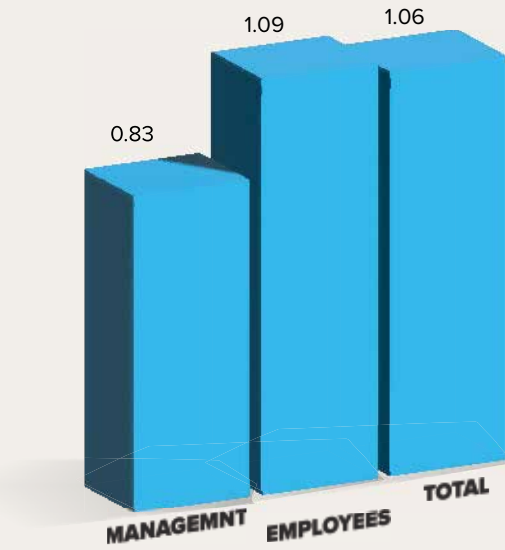
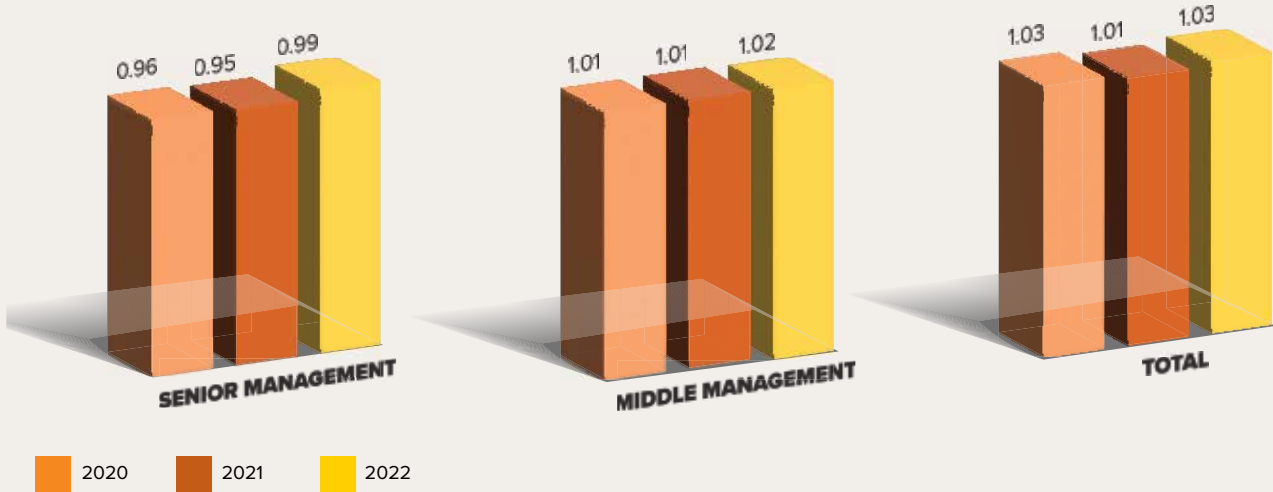


Figure 7: **Basic salary ratio of women to men OASA.**

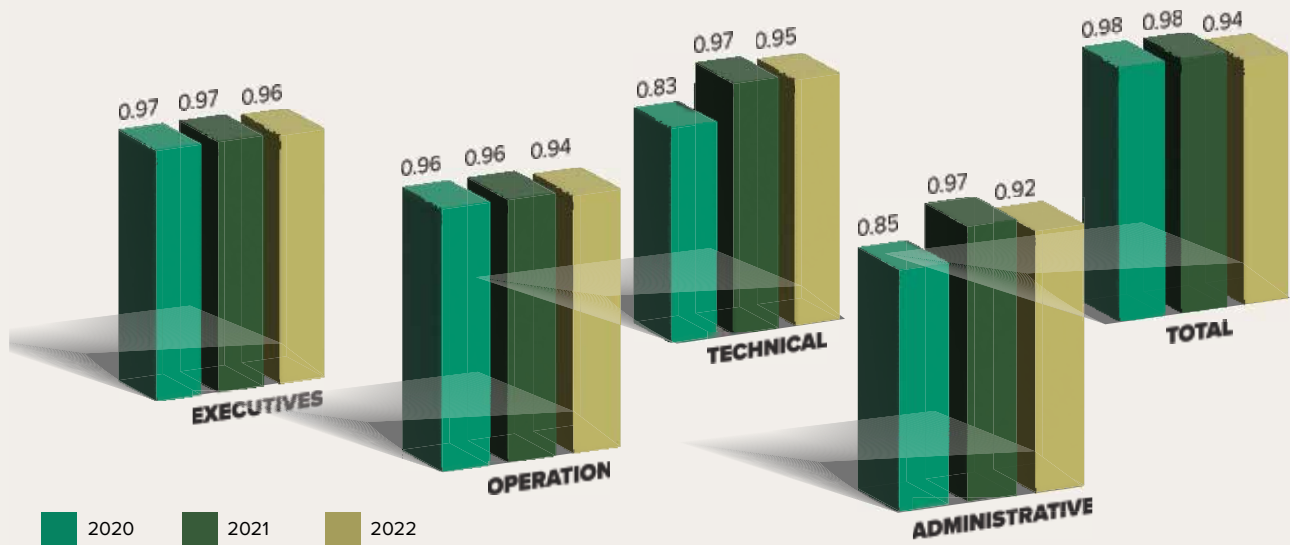


Note: More information regarding the CEO/Employee compensation ratio is available in section 6.4 "ESG Performance Indicators (KPIs)".

Figure 8: **Ratio of basic salary of women to men OSY**



6. The CEO/Employee pay ratio is defined as the ratio between the CEO's annual total compensation and the average value of total employee compensation (excluding CEO compensation).

Figure 9: **Ratio of basic salary of women to men STASY**

Note: More information on women/men's basic salary data is available in section 6.4 "ESG performance indicators (KPIs)".

Training and skills development

GRI 404-1 (a-i), GRI 404-2 (a)

The Group continuously invests in the training and development of employees in all three companies, recognizing that the high level of services offered and the satisfaction of passengers depend on the skills possessed by employees. Also, employee training contributes to their personal development and empowerment and enhances their professional skills and performance. At the same time, the continuous education and training of employees contributes to establishing good corporate practices, strengthening their cooperation and improving corporate identity. The Group offers internal and external training for employees to receive new knowledge and expertise that will help them in terms of personal development, while at the same time, the Group grows as the professional and scientific background of employees is upgraded. Within 2023, 64 employees of the Athens Transport Group were enrolled in the Hyperfund Sustainability Academy and 25 of them received a relevant certificate for their successful participation.

Specifically, OASA carried out training programs to enhance employees' skills regarding corporate procedures, such as submitting a detailed periodic EFKA declaration, Electronic Document Handling, and the control and clearance of public procurement expenditures. Also, training was carried out in quality Passenger Service and training in MS Office applications.

Also, in the context of telematics work, the Group conducted the 2022 annual training and updated the training manuals of OASA-OSY users according to the new functionalities and tools developed during the year. An intensive program of specialized training was implemented for the operators of the Vehicle Management Center of OSY based on the new developments in the telematics system regarding the full functional integration of the routing data of the means (under the current operational conditions) in the Real Time Passenger Information systems (Daily Scheduling).

OSY conducted training programs, the content of which concerned topics of organization and operation of the company, procurement, financial nature, legislation, processing and security of personal data, the use of new technologies for communication topics, the improvement of skills for the use of computers, the development of executives, the learning of ecological driving "Eco Driving" and in collaboration with the CPC for Drivers School of OSY, for the acquisition of the Certificate of Professional Competence.

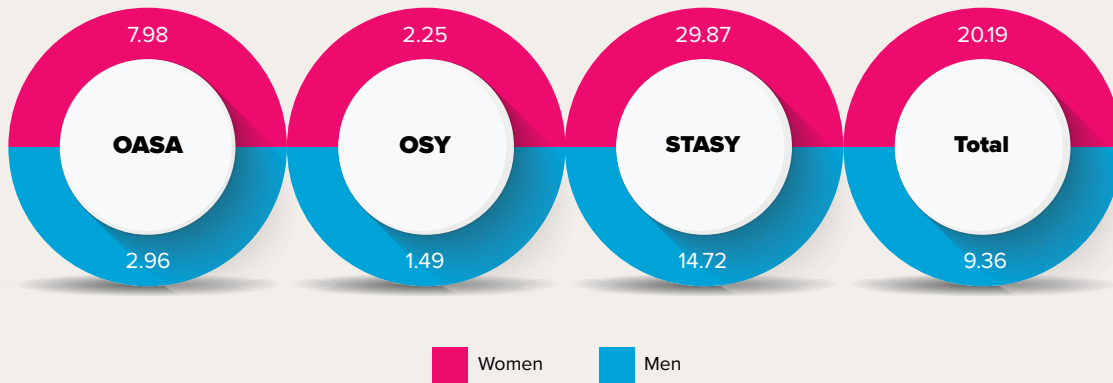
At the same time, OSY created the innovative online knowledge portal "OSY Academy", the first online academy designed to meet the needs of a PUC, to equip the company's employees with the necessary knowledge and tools to ensure the safety of both them and the travelling public. The employees of OSY have the opportunity to be trained and informed at any time needed, wherever they are, by any means at their disposal, as training technologies are applied, such as interactive activities, simulations on electronic equipment, eBooks referring to the company's many processes and video animations. The portal is a tool for learners and trainers, as it combines asynchronous training with digital media and traditional classroom activities.

In the online material, integrated training programs have been designed and created based on the needs of employees. The user can find training for acquaintance with the company and its culture, simulations of buses and their mechanisms, courses for the Certificate of Professional Competence (CPC), as well as the necessary technical and theoretical knowledge that may be needed. In addition, a special area has been created for employees' children, who can navigate with dad and mom's bus, play with their favourite heroes and learn songs in Greek and English.

STASY Training is carried out on two main axes: a) the training/retraining of specialities and b) the training of safe work. The training/retraining of speciality concerns topics of regulations and procedures, as well as handling equipment, passenger service and more. Through training on occupational safety topics, employees are trained to know and deal with the risks lurking in the STASY network to reduce occupational accidents. The training of the employees ultimately results in the best service for the travelling public, both in terms of traffic management and safety.

In 2022, the Group provided a total of 49,203 hours of training, the majority of which were implemented by STASY by 84.06% and the average hours of training totalled 20.19 hours for women and 9.36 hours for men.

Figure 10: **Average hours of training by gender**



Note: More information regarding training data is available in section 6.4 "ESG Performance Indicators (KPIs) and for the OSY ACADEMY Knowledge Portal on <http://www.osyacademy.com/website>.

Diversity and equal opportunities

GRI 401-1, GRI 405-1 (b-i, b-ii)

TR-RO-320a.2

The cultivation, establishment and consolidation of a stable, modern and healthy corporate environment that will promote the Group's work and will be characterized by the principle of equality, especially with regard to gender, respect for individual rights, respect for diversity, is everyone's obligation and is a requirement of the Group's Code of Ethics and Professional Conduct.

In the Group, everyone is required to operate in a meritocratic manner, behave with respect and dignity towards their colleagues and partners, and not tolerate any form of discrimination and harassment in the workplace. This ensures the creation of a working environment of equal opportunities for development and professional development for all, a fundamental prerequisite for healthy business activity, social cohesion, and progress.

The subsidiary companies of the Group, for the regulation of working conditions and labour peace, have an Internal Organization and Operation Regulation⁷ (KEOL), which regulates the Disciplinary Law that applies to their employees and disciplinary penalties are imposed by the competent bodies on a case-by-case basis, i.e. the Disciplinary Board of the Company, the CEO, the General Managers and the Directors.

The Group systematically monitors and records its employees' total hiring and departures and the hiring and departure indicators. In 2022, 66 new hires were made, with OSY to make 39 recruitments, STASY to follow with 22 hires and OASA with 5 recruitments, compared to 600 in 2021, showing a decrease of 89%. Also, in 2022, 247 employees left the company, namely 182 departures in OSY, 58 in STASY and 7 in OASA, compared to 221 in 2021, showing an increase of 11.76%.



Figure 11: **Hires**

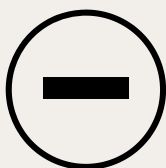
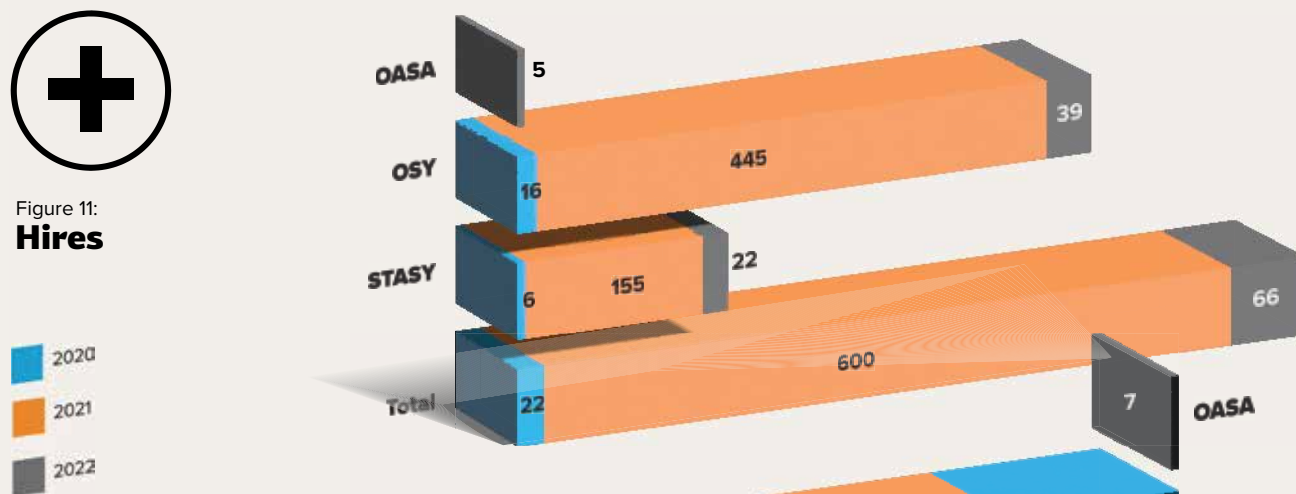
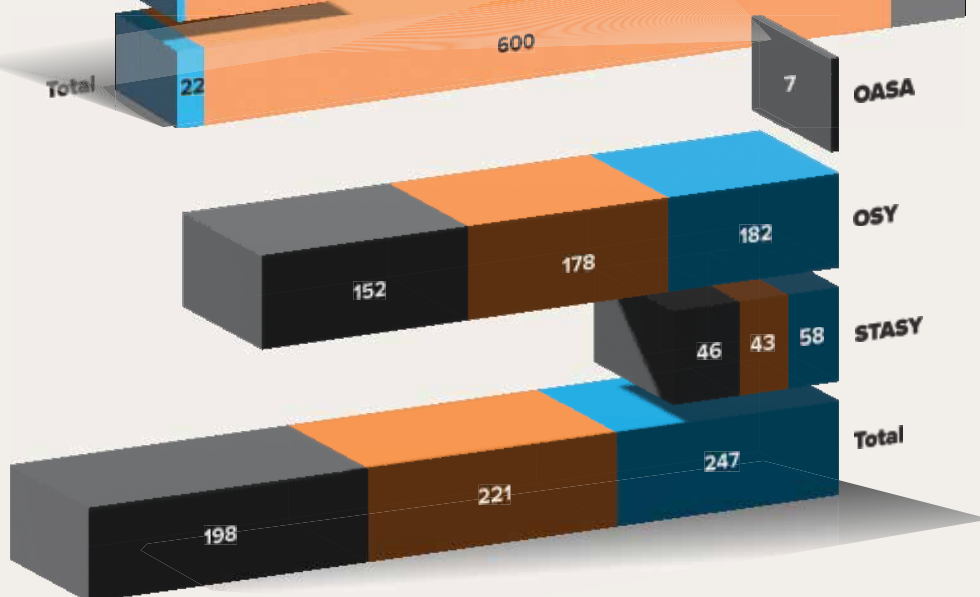


Figure 12: **Turnover**

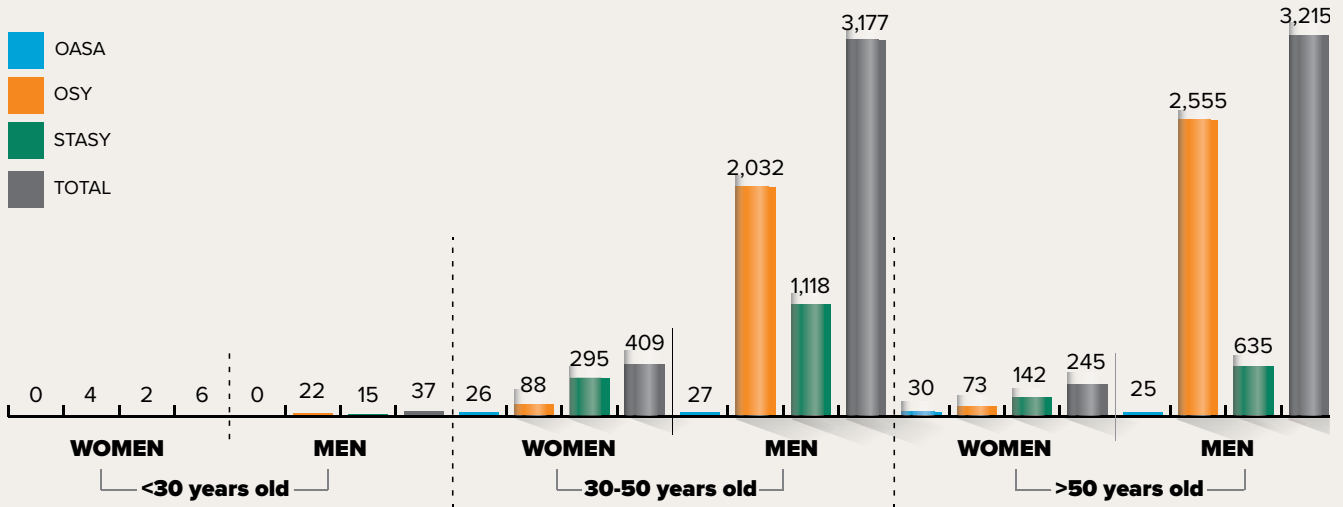


Note: Recruitment and departure data are not available for OASA for the years 2020 and 2021. More information on employee turnover data is available in section 6.4 "ESG performance indicators (KPIs)".

7. Government Gazette 505/28.02.2014

The Group seeks to preserve diversity by recording the composition of its workforce by gender and age group. More specifically, in 2022, the distribution of employees by age group was as follows: 0.6% under 30, 50.59% in the 30-50 age group and 48.81% over 50 years old.

Figure 13: **Distribution of employees by gender and age group**



Note: More information on the Code of Ethics and Professional Conduct is in section 5.1 Corporate Governance and on employee diversity data in section 6.4 "ESG performance indicators (KPIs)".

Health and Safety

The Group is committed to ensuring, to the extent possible, all employees' safety and well-being and protecting passengers from risks that may arise from its activities. In this context, it implements a Health and Safety Management System, performs risk assessments, and provides health services to employees. It also conducts training and preventive exercises to deal with emergencies and encourages employees to communicate situations when they perceive that risks arise so that they can immediately take corrective actions.

Health and Safety Management System

GRI 403-1

The Group implements a Health and Safety Management System, per legal and other national, EU and international requirements, directives and regulations in the health and safety field, and it has been based on data collected for risk assessment purposes.

In particular, whenever a potential risk is identified (exposure to chemicals, intense noise or vibration, excessive work stress, prolonged adverse postures requiring ergonomic interventions, etc.), a risk assessment of the relevant risk is carried out, resulting in the recommendation to the management of the Group's companies to take administrative, organizational and technical measures to prevent any adverse impacts on employees' health.

The System covers all employees, including workers who are not employees of the Group (employees of contractors and external partners). The Group applies relevant legal provisions for their medical surveillance, which their employers provide. Furthermore, the Health and Safety Management System covers tasks carried out by the employees of the subsidiaries (electrical, electromechanical, construction, maintenance, track works, rolling stock, telecommunications, signalling).

Regarding facilities, the System covers all workplaces, including boarding stations, warehouses and Metro tunnels. As far as the premises of OASA are concerned, there is no System as they are office buildings and the work is administrative and clerical.

Risk Management and Employee Participation in Health and Safety

GRI 403-2, GRI 403-4

TR-RO-320a.3

The identification of risks to employees' health and safety is of particular importance for the effectiveness of the measures implemented. The Group's activity involves largely unavoidable risks, such as traffic within the city, exposure to physical agents such as noise and vibration, work with chemicals, and even criminal acts in public places.

In this context, the Group takes measures that include hazard elimination at source, replacement of material or process, safe working methods (ergonomic improvements and organizational procedures, such as shift duration and night shift management) and personal protective equipment.

For the premises of the buildings and the employees of the Group's offices, the process of identifying potential risks is carried out by the Safety Officer of each company, who visits and consults their facilities throughout the year and informs the Technical Departments in writing and orally of any comments. The Group's companies ensure the integrity of the risk identification process through cooperation with a specialized firm that undertakes the writing of each Written Occupational Risk Assessment in cooperation with the Technical Departments.

However, in addition to risk identification procedures, employees and their representatives, as members of the Trade Unions' Health and Safety Committee and individually, have an important role in communicating them.

Employees are required to report to their Supervisor any failure or defect in the equipment or facilities they use so that any possible risk can be contained. Employees are also asked to report whether they have identified activities and procedures or actions of third parties which may cause hazards and possibly lead to accidents, destruction of equipment or installation, or damage to foreign property and take action to minimize risks within their work environment. Then, after examining the situation, the Occupational Medical Service topics adequacy or non-adequacy documents or recommends collective preventive measures.

The monitoring of the implementation and implementation of the measures for health and safety at work is carried out in cooperation with the safety technician and occupational doctor, the management of the group's companies, and the employees. Cooperation is achieved through meetings, written or oral briefings or reports and/or visits to premises and facilities.

In the Written Occupational Risk Assessments, as well as in the instructions that have been notified, it is stipulated that in case an incident occurs, the Occupational Doctor and the Safety Technician are first informed, in addition to the competent authorities, who will investigate the incident and its causes and propose measures on how to prevent similar situations in the future. In addition, The respective divisions of the subsidiaries continue to study health and safety incidents (accidents, near misses, sudden illnesses in the workplace, long-term absences) individually and collectively, then issuing conclusions and recommendations for preventive measures.

Implementation of Security Measures in Building Facilities

Based on the occupational risk assessment, the Technical Departments of the Group's companies carry out repair and maintenance works of buildings, electrical and plumbing equipment, as well as networks, to safeguard the health and safety of employees, informing the management of further obligations, to initiate other, new actions deemed necessary.

In particular, regarding the headquarters of OASA at 15 Metsovou Street in Athens, due to the age of the building, marble fell from the balconies, and for this reason, all necessary actions were taken to install scaffolding and a safety net. The company is approving the studies for the repair of the facades and the roof, which have been submitted to the competent Services to announce a tender in early 2024 for the repair works. However, the company's management has decided to relocate its services to a new building.

Regarding the building at 16 Rethymnou Street, in Athens, by decision of the Board of Directors, a Fire Safety team has been appointed and a preventive evacuation exercise of the 6th floor has been carried out, according to the instructions of the Safety Officer, because it is a six-storey building that houses the largest number of employees and a Public Service Room. Also, a security system with alarm, cameras, entrance control, and a fire detection system will be installed in the building at 16 Rethymnou Street, as provided by the Fire Safety Study. It is noted that the Technical Department on each floor has prepared and posted the Escape Diagrams in all facilities.

OSY has developed a security system that includes recording and surveillance cameras of the Ano Liosia and Thrasio parking lots, while at the same time, the guardhouses of the security personnel have been reinforced with 24-hour staffing. A turnstile system has been installed at the Central Service. In addition, additional lighting pylons and an entry-exit control system for vehicles (parking bars) have been installed in all parking lots. At the premises of OSY, escape plans have been posted and fireproof security doors have been installed at the Central Service.

STASY, in compliance with Law 2434/12-09-2014, implements and maintains the appropriate Chief/Deputy Chiefs/Fire Protection Teams structure for all its facilities, in local parking lots and the railway network, above ground or underground. Relevant fire safety issues are recorded in an organized manner and are immediately resolved by the competent technical services of STASY, as they carry out a preventive maintenance program in all means of fire protection, active or passive. Also, the issuance of Fire Protection Certificates is complied with in accordance with the applicable legislation and the relevant instructions of the Fire Service. A Fire Safety File is created for each Fire Station of the railway network to deal with fire incidents more effectively.



STASY is in direct and frequent contact with the Fire Service through links designated on behalf of STASY and the Fire Service, where joint evacuation exercises of trains and stations are planned and implemented. There are also regular building evacuations by all employees.



Health Services Provided

GRI 403-3, GRI 403-6

According to individual and collective labour agreements, the National Social Security System compulsorily covers all employees regarding health insurance, sick leave, and public hospital/diagnostic tests. The Group implements a system of medical monitoring, protection and prevention of employees' health through:

- Periodic medical examination of all employees, based on individual health status, age and type of work.
- Additional medical examination upon request.
- Examination after illness/long sick leave.
- Examination after a change of job.
- Check after an accident.
- Examination after incident report.
- Examinations for recruits.

Also, employees may come at any time to be examined for health issues affecting their work capacity or for health disorders their work may cause.

In addition, in compliance with legal requirements, employees have access to their medical records, which are securely kept and classified by the Medical Service. Employees undergo periodic medical examinations by Occupational Doctors using the Group's medical instruments and, when necessary, are referred to external physicians. The participation of employees in the above activities is facilitated by administrative procedures, such as shift modification, referral for consultation during working hours and exchange of administrative documents (including medical records), which is implemented under strict confidentiality rules.

Other health benefits of the Group include the organization, equipment, installation and maintenance of first aid areas and procedures, the conduct of vaccination programs and the establishment of groups of employees at high risk for heat waves for extreme air pollution incidents. The Group voluntarily offers advice and guidelines on health topics, focusing, mainly, but not exclusively, on the prevention of health risks from smoking, obesity, drug and alcohol abuse, immune system disruption, reduced sleep, stress and psychosocial factors.

Health and Safety Education

GRI 403-5, GRI 403-7

Training on health and safety at work is part of the training programs that are organized, both during the recruitment of employees and in cases of job change. In particular, first aid training is provided to selected employee members, and training seminars on occupational hygiene and prevention (including anti-bullying counselling services) are also offered. Furthermore, employees receive updates and training material on Health and Safety and dealing with potential risks via email and can address any questions, clarifications and remarks to their supervisor, the respective Human Resources Departments (HRD), the Safety Technician and the Occupational Doctors.

In addition, OSY, on the initiative of the Technical Department, conducts fire safety training of personnel by the Fire Service on a date when the competent Service will be available. Furthermore, it has been proposed that HRD and the Occupational Doctor conduct first aid training. Subsequently, STASY implements training on Fire Protection issues for all employees as well as a more specialized training cycle at the Fire Academy.

In addition, the contracts signed with contractors include a special annex concerning the terms of health and safety at work, which must be observed during the execution of work by contractors' employees at the Group's facilities and subsidiaries. In addition, before the commencement of work, the subsidiary companies provide training to the employees of the contractors and give the necessary certifications, depending on the job and the place where it is performed.

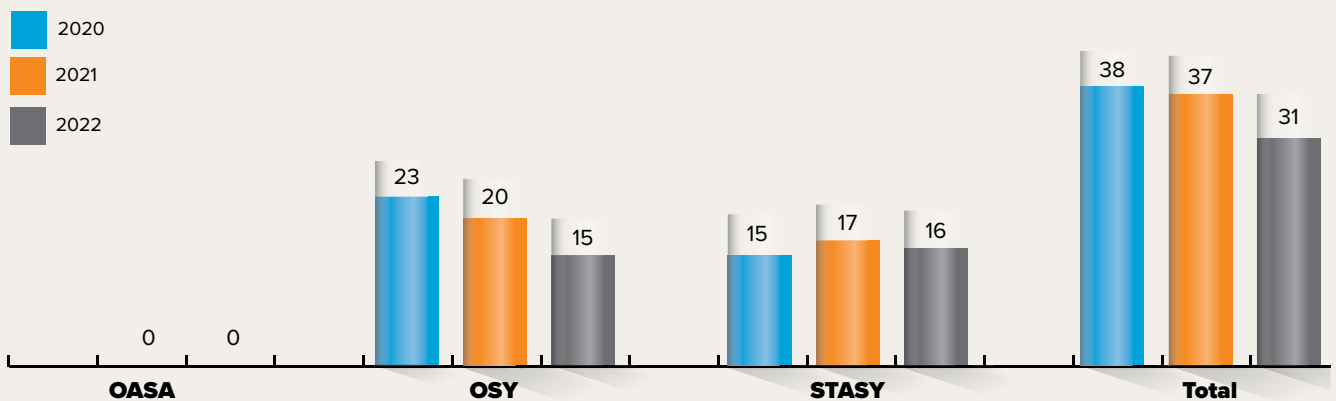
Health and Safety Facts

GRI 403-9 (a,e,f), GRI 403-10 (a-ii)

TR-RO-320a.1 (2-a), TR-RO-540a.1

During the reference year, 17 injuries were recorded by STASY employees, and 15 injuries to OSY employees, compared to 16 and 23, respectively, of the previous year, while in OASA, there was no recorded injury. The incidents involved injuries from slip-tripping, traffic accidents during the commute (no traffic accidents at work in OASA and STASY), external threat-criminal action, collision on fixed objects, pathological causes and falls. There has also been no workplace-related illness in employees of the Group's companies.

Figure 14 : **Recorded injuries**



Note: For OASA, there are no data available for the year 2020, more information regarding health and safety data is available in section 6.4 "ESG performance indicators (KPIs)".

Working conditions and human rights in the value chain

GRI 414-1

In the group, all employees must understand and comply with its principles and values, act responsibly towards society, and demonstrate professional and business ethics that do not offend its image, reputation, and work. The Group considers the working conditions and rights of employees in its value chain in accordance with Law 4412/2016, which defines the Basic Obligations of the Parties, providing for evaluation of suppliers in the context of the Processes & Procedures of the Quality Management System. In addition, the procurement regulations, the works contracts, the special procurement procedures, and the framework contracts as a subsidiary of Growthfund are under development following the adoption of Law 4972/2022.

Within the reporting year, Athens Transport Group companies did not evaluate suppliers based on social criteria regarding working conditions and human rights in the value chain. The Group does not have due diligence procedures, but suppliers are audited in each separate tender process based on the requirements of the law and the corresponding invitation/proclamation.

4.2 Sustainable Urban Mobility

**Material topics: Safety of passengers and users
Clients and user rights and privacy
Sustainable Urban Mobility**



GRI 3-3

Safety of passengers and users Impacts	
Actual	Positive • Through the provision of quality services by OASA's subsidiaries, with the help of internal training on regulations and procedures, as well as on equipment handling and passenger service.
	Negative • From accidents on platforms to road accidents involving buses that do not allow passengers to ensure physical, mental, and social well-being, including safety aspects.
Financial Opportunities	
• By protecting the health and safety of consumers and end users of the products and services of OASA's subsidiaries, leading to increased profitability and reputation preservation.	
Financial Risks	
• From complaints, compensation and fines in cases where the integrity and health of consumers and end users of products and services of OASA subsidiaries are endangered.	

Clients and user rights and privacy Impacts	
Actual	Positive • Through seamless access to information for clients and end users.

Sustainable Urban Mobility Impacts	
Actual	Positive • Through the accessibility of citizens/passengers to safe, affordable, efficient and sustainable mobility and transport systems and infrastructure.

Safety of passengers and users

GRI 416-2 (a-i)

In compliance with the Regulation on Passenger Rights of regular and occasional services by road means of public transport (Buses) and track-based modes of transport (Metro and Tramway)⁸, the Group takes actions to safeguard passengers' health, hygiene and safety.

More specifically, TPPC serves passengers and carries out the transportation work with vehicles/trains, as per the law, the contracts between OASA & TPPC and the relevant decisions of competent bodies are determined. It shall take all necessary measures on time, in case of failures, to restore, as soon as possible, the smooth operation of the network and facilitate the smooth operation of the routes.

The recommencement of the operation of the economy, after the restrictive measures implemented due to the COVID-19 pandemic and the gradual and continuously increasing trend of using public transport, in combination with the changing epidemiological conditions of the pandemic, such as its mutations, the increase in cases, the degree/frequency of transmission of the disease as well as the uncertainty that had been created, made it necessary to continue the cooperation with the KTEL in order to decongest public transport and better serve the passengers.

8. Government Gazette 1181/B/19-6-201, available on the website <https://www.oasa.gr/en/>

Furthermore, the Group's subsidiaries systematically maintain rolling stock and provide all the necessary support services and facilities to ensure passengers' safe and comfortable movement. In addition, they safeguard the cleanliness and hygiene of vehicles and trains put into circulation, as well as the areas used by the public (stations) and ensure the safe movement of passengers, prohibiting entry to the premises, means and infrastructure of the Group to people with uncovered wounds or wounds, to avoid transmission of diseases to third parties, as well as the transport of flammable and explosive substances.

During the reporting period, there were no recorded incidents of non-compliance with regulations and/or voluntary codes regarding the health and safety impacts of OASA services. On the contrary, in OSY, there was 1 incident that led to the imposition of an administrative fine regarding the performance of work under the influence of alcohol. The OSY carries out continuous driver training to avoid incidents that may have a negative impact on the health and safety of passengers. Concerning STASY, no data is available for the reference period. The company is developing internal data collection procedures to respond to the next Sustainability Report.

Customer and user rights and privacy

Through telephone and electronic service, the Group informs the passengers regarding its information on the Group's topics and provides the required information, which is always given in cooperation with its competent services.

Telematics

The telematics project concerns a fleet management and passenger information system for ground transport means (buses and trolley-buses), aiming at optimizing the performance and quality of the provided transport work.

In the telematics system, where all bus lines have been integrated, it is possible to display them at "smart" stops, while the service of informing urban transport users through smart devices (mobile phones, tablets, computers) has been implemented, giving the opportunity for easy and timely updating of the details of each route.

In addition, the operational data describing the traffic events of all vehicles will be digitally interconnected with the corresponding validation data of the Electronic Ticket system, as the interconnection of telematics data with the Automatic Fare Collection System (AFCS) has not been implemented to obtain useful indications of the degree of occupancy of vehicles during peak hours. The application makes decisions to strengthen specific lines based on demand data and to avoid severe overcrowding.

Table 12: **Benefits of implementing telematics**

Passengers	OSY and STASY
<ul style="list-style-type: none"> • Real-Time Information System. • Informing Passengers with 1,000 "Smart" Stops. • Informing Passengers inside the vehicle about the progress of the Route through Screen and Audio Announcement. • Informing passengers via smartphone app and website (web) about the planned and executed transportation project. • Transportation Service is available at all public transportation stops. • Update on Emergency Events in the Transportation Network. • Reduction of the waiting time at the stops and the total travel time. • Improving the quality of travel by utilizing vehicle traffic data. 	<ul style="list-style-type: none"> • Qualitative and quantitative upgrading of services provided to passengers (reliability, accuracy, information). • Optimum Vehicle fleet management using an Automatic Positioning System (Vehicle GPS) for real-time updates. • Dynamic and Accountable Supervise the execution of the transportation project. • Two-way wireless communication between the management center and the drivers. • Update drivers by sending management center information and commands in real-time. • Increasing employees' safety with a communication system with multiple alternatives (voice, text, emergency silent alarm).

Passenger Information via 11185

The Group provides information through telephone line 11185 to passengers regarding their transportation by public transport and their service in the best possible way. In total, approximately 137,043 passenger calls were handled in 2022.

In addition, the shared database has been updated with all new information for valid and more accurate information and tools to facilitate the search for bus service modifications and important updates. Also, the information center provided passengers with information and service on electronic ticketing topics, namely:

- Provision of information on card issuing points.
- The required supporting documents per category of beneficiaries.
- Support in activating the rights of the unemployed and people with disabilities.
- Information on how to acquire and use (charge, validate) new products.

Passenger Information via Email and Website

In 2022, OASA answered 2,666 informative e-mails, including complaints transmitted to stakeholders through the client care email account. 171 announcements were issued and posted on the OASA website and 21 press releases were communicated.

In the context of the Group's digital transformation, a new interactive tool was added, the chatbot "digital assistant" (AI), which is an "artificial intelligence" program that interacts with users/passengers, providing helpful information and answers on routes, schedules and tickets. In addition, it enables Contact Live Agents (11185 and Service Center executives) to resolve more specialized topics.

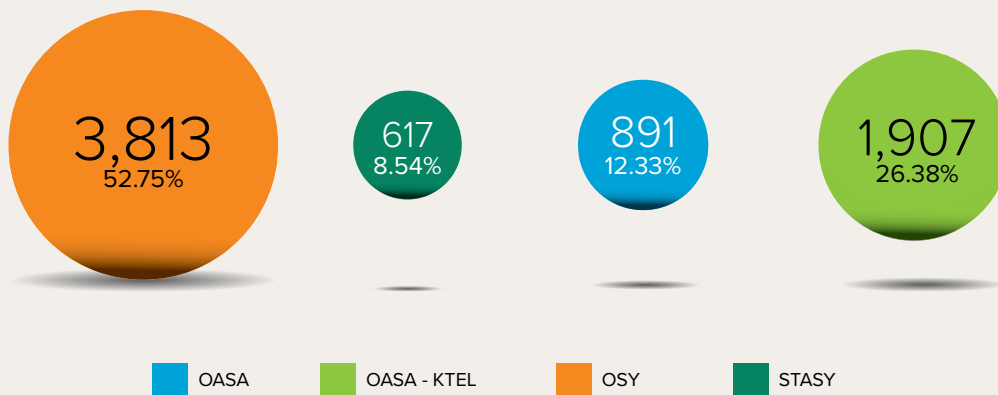
The application of the chatbot digital assistant has enriched the Group's interactive services, as since 2021, the digital interactive map has been put into operation, and it includes useful information for urban transport in Athens. The map, available on the OASA website, in the section "Attica Public Transport Service", provides a cartographic depiction of all urban transport services in Attica, with the necessary information for passengers.

Management of Passenger Complaints

In 2022, Athens Transport Group proceeded with the collection, management and transmission of complaints registered:

- The complaint reception form on the OASA website (total of 7,228 entries).
- The organisation maintains the electronic protocol "PAPYRUS" related to complaints, reports, complaints, and suggestions of the travelling public.

Figure 15: **Number of complaints per company**





Privacy Protection

GRI 418-1

The processing of personal data included in the reports is carried out in accordance with national and European legislation on personal data, as well as the relevant policies of the Group. In particular, the personal data of all parties involved in the report are protected and processed solely to prevent detecting or investigating irregular, unethical, illegal or criminal conduct.

The Group implements the necessary technical and organizational measures to ensure a high level of data security, access to information "on a need-to-know basis", the commitment of personnel accessing with confidentiality obligations, recording of accesses, monitoring of access and access rights, use of encryption, keeping passwords confidential, in accordance with its applicable policies and procedures.

In 2022, there were no substantiated complaints about breaches of client privacy and loss of client data for Group companies.

Sustainable Urban Mobility

Internal Performance Indicator: Number of Routes

Internal Performance Indicator: Vehicle-kilometers

Internal Performance Indicator: Boardings

Internal Performance Indicator: Kilometric network (km)

Internal Performance Indicator: Number of lines

Sustainable Urban Mobility Plans

According to the legislation, OASA⁹ cooperates with 40 Municipalities of Attica to develop Sustainable Urban Mobility Plans (SUMPs). The action will continue in 2023, with the formulation of measures and proposals that will promote sustainable modes of transport (walking, cycling) and their combination with urban transport, discouraging the use of private means so that, cooperatively, the State is led to reduce air pollutant emissions and limit the Greenhouse Effect.

The strategic directions of the action plans mainly concern the improvement and expansion of infrastructure to encourage pedestrian travel, the improvement of bicycle infrastructure, the reduction of motorized traffic, the increase of road safety, the creation of green routes, the increase of transport efficiency, the creation of municipal transport lines, the management of parking, but also the undertaking of actions promoting sustainable modes of transport. These guidelines are specified in packages of measures progressively developed over the time horizons examined by SUMP.

OASA, as the executive management body of the transport project, is significantly involved in the definition of SUMP actions related to the improvement of the quality of urban transport, as it directly expresses the correctness of the choice of actions, the prospect of their applicability, as well as the quantification of objectives related to Public Transport.

It is clarified that the processing of the already approved SUMPs by the Municipalities is planned to be done in the light of the Group, under the terms and objectives set in the Attica Strategic Transport Plan, to align the common goals. The packages of measures resulting from the SUMPs and especially the actions related to Urban Transport, will be brought to the Group's attention, will be checked for the whole of Attica and will be included in the Attica Strategic Transport Plan (ASTP), which will be prepared over a 20-year horizon. The common ambition of SUMPs is to create a different mobility culture for citizens, friendly to urban transport and active mobility, which coincides with the timeless approach of the Group's role in serving urban passenger mobility.

9. Law 4784/2021 and Law 4599/2019

Number of routes:



3,667,923

Vehicle-kilometres



139,048,036

Boardings



414,255,000

The Group has developed a series of internal performance indicators for more effective network monitoring and timely implementation of corrective actions. For 2022, internal performance indicators were as follows:

Attica Strategic Transport Plan (ASTP)

2022, the specification was drafted, and the ASTP declaration issue was updated. The tender started later this year and is expected to be signed in January 2024. The new ASTP aims to improve the mobility of the citizens of Attica and the efficient operation of the Athens Transport system. In addition, it is important to formulate a transport policy for the Group for the next decade, considering that the previous Transport Master Plan was completed in 2009.

Transportation for disabled people

The Transportation Service for disabled people of OSY serves those who cannot move with the existing transport network or are destined for areas of the network where vehicles with the required wheelchair access equipment are not routed. This effort aims to ensure the safety of special social groups or categories and avoid social exclusion. Specifically, OSY owns 3 specially designed buses that are regularly available to clubs, non-profit companies, as well as disabled sports teams for cultural and sports events. In their entirety, the vehicles of OSY are on low floors, with the possibility of kneeling to the boarding side, and the majority of them have a special extended ramp, which makes it easy to board, even wheelchairs. In most vehicles, there is a specialised insured space for placing a wheelchair inside the vehicle, while at the same time, the person travelling with a wheelchair can press the stop button to disembark.

Also, STASY ensures that stations and trains on Metro Lines 2 and 3 are friendly to the service of disabled people by providing facilities such as markings on the first and last steps of the fixed staircases, direction indicators and emergency buttons for stopping the operation of escalators. Additional warning markings are also applied – change of floor texture at the edge of the platform, signs and graphs with more legible elements, signs and graphs showing the facilities offered, accessible seats on the platform, double handrails on fixed two-way stairways, CCTV cameras, kerb cuts, guides for the blind.

In addition, there are accessible elevators at all stations, recorded announcements in the elevator cabins, intercom with the Station Manager in the elevator cabins, audio announcement of floors, Braille on floor buttons, ramps for altitude changes, existence of special disabled gates, emergency telephones at the levels of ticketing/check-in area and platform, toilets for wheelchair users at all stations and parking lots.

In addition, it has created a mini digital application through which every disabled or hindered passenger can be informed in real-time about the operating status of the lifts in the metro stations. At the same time, it approved and will implement a pilot project of electronic universal accessibility within 2024. At the same time, it is proceeding with the signing of a Memorandum of Mutual Understanding & Cooperation with the National Confederation of Disabled People Greece (NCDP).

Improving Accessibility

To serve disabled persons, in June 2022, OASA completed the equipment of 156 stops with high passenger traffic, with 409 special pre-fabricated overhangs, to facilitate embarkation/disembarkation in public transport. These stops are mainly located around fixed track stations to create an integrated access framework. The project was implemented through E.P.Y.ME.PER.A.A.¹⁰ of the NSRF 2014-2020.

At the same time, in collaboration with Growthfund - SKEP (Association of Social Responsibility for Children & Youth) and the Group, actions were implemented regarding:

¹⁰ Operational Programme "Transport Infrastructure, Environment and Sustainable Development"

Mileage network

Buses 5,781 km.
Trolleybuses 368 km.
Metro 89.9 km.
Trams 29.8 km.

Number of lines

Buses 258
Trolleybuses 20
Metro 3
Trams 2

2022 Sustainable Development Report

- Evaluation-improvement of website accessibility.
- Update the website oasa.gr for stops with a hanging, interactive map.
- Training Program on Accessibility Specifications for Communication Materials.
- Maintenance on the ramps of the available buses.
- Telematics update for vehicles with available ramp.
- Issues related to the regulation of audible announcements at telematics stops.
- Improvement of accessibility at Monastiraki Metro Station.
- Identification of interventions to improve accessibility at Kallithea Metro Station.
- Improvement of accessibility to Metro station platforms (gap between station and platform).
- Improvement of service for passengers with speech and hearing impairments regarding information topics and use of automatic machines to purchase fare products by visually impaired passengers.
- Development of a Disability Index for recording-evaluating the use of public transport by disabled people.

Digital Applications

OASA recognizes the value of digital applications that improve the experience of passengers during their daily transportation with the public transport of the Group's subsidiaries, so it has taken innovative initiatives that are part of the modernization of services characterized by their digital transformation, specifically, OASA has proceeded:

- The design of new reports and applications in the business Telematics software (skyview) it handles. These concerns indicate fare points of sale and separate lines according to their transport identity (basic, extraordinary, etc.).
- The improvement of passenger information tools.
- EMV bank cards and mobile phones are used for public transport transfers for purchase and validation. It concerns using bank cards and mobile phones for transportation by public transport (purchase validation). The means of fare will be the bank card itself, either in plastic or embedded in the mobile phone or other device. The passenger who uses his card for journeys will be charged at the end of the day with an amount depending on his travels, with the choice of the best solution and according to the pricing rules that will be set. In 2022, procedures were carried out to find a technical solution for the implementation of the project in the following years.
- The interoperability of the AFCS with other applications-Implementation of Account Based Ticketing System (ABT) - Mobility as a Service (MaaS). It concerns implementing a sophisticated state-of-the-art system for providing mobility services, including bank cards, smart cards and mobile phones linked to a user account on the back-end of the Cloud server. With the implementation of the system, the correct and optimal fare value for the passenger will be calculated (Including maximum fare capping features per specific time period or number of trips). The implementation of PBT will also form the basis for the implementation of Mobility as a Service (MaaS) so that open interconnection with other BackOffice systems (e.g. mobility partners) is possible and the provision of an interoperability platform for OASA is available. In 2022, procedures were carried out to find a technical solution for the implementation of the project in the following years.
- Implementation of NFC Athena card application for IOS: This functionality is part of the implementation of the Account Based Ticketing System (ABT) - Mobility as a Service (MaaS). With the implementation of this functionality, the passenger automatically carries out the charging process of the fare type via a mobile phone equipped with an NFC function.

Quality assurance

The OSY 2022 completed management system certification per the ISO 9001:2015 Standard, "Quality Management System" requirements. Even OASA, faithful to its goal of transitioning to a more "passenger-centric" model and upgrading the quality of its services, from 2020, implements a Quality Control System in accordance with the European Standard EN 13816:2002 "Transportation - Logistics and Services - Mass Transit - Definition of Service Quality, Objective Objectives and Measurements".

The EN 13816 Standard applies to companies and organizations providing passenger transport services. It concerns the providers of these services, Public Bodies and Authorities who wish to align public transport with the expectations of passengers and society. It defines the requirements that determine and measure the quality of the services provided by public transport to the passenger public and gives directions in the choice of the relevant measurement methods.

O.A.S.A., following what is imposed by Standard EN 13816, prepared a series of Quality Indicators, which it monitors with constant frequency, to constantly improve the quality of the transportation work provided and the satisfaction of its passengers. The implementation of this system is controlled and certified by the independent Certification Body.







05

Governance

5.1 Corporate Governance

GRI 2-9, GRI 2-11

Athens Transport Group pursues its activities based on business ethics, transparency and compliance with the regulatory framework. The Boards of Directors (BoD) are the highest body of the Group's companies and are responsible for managing and fulfilling their statutory objectives. The BoD of OASA consists of 8 members (six men and two women) with a four-year tenure, of which 3 independent non-executive members, including the President of the BoD. The members of the BoD include representatives from the Ministry of Economy and Finance¹¹ and the employees, while the CEO of OASA, apart from being a member of this BoD, holds the position of a member of the BoD STASY and is President of the BoD of OSY.

Table 13: **Board of Directors of OASA**

Name	Title	Tenure
Mr. Sardelis Christoforos	President Board of Directors - Independent Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mr. Spiliopoulos Georgios	Chief Executive Officer - Executive Member of the BoD	5/1/2023 – 5/1/2027
Mrs. Antonopoulou Irida	Deputy CEO & Executive Director - Executive Member of the BoD	21/12/2021 – 21/12/2025
Mr. Pantazis Ioannis	Independent Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mrs. Hardouveli Susan Bejian	Independent Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mr. Sakellariadis Konstantinos	Non-Executive Member of the BoD	11/9/2023 – 11/9/2027
Mr. Angelopoulos Panagiotis-Iason	Non-Executive Member of the BoD	26/4/2022 – 26/4/2026
Mr. Papadopoulos Pavlos	Employee Representative - Non-Executive Member of the BoD	11/11/2021 – 11/11/2025

Audit & Risk Committee

The Audit & Risk Committee is responsible for establishing and maintaining an effective Internal Control System (ICS) to achieve the Group's objective, an essential part of which is preparing and presenting a financial report free from errors or omissions. This responsibility includes the design by the Management of the Group's companies of certain controls, which prevent or discover cases where process and control systems do not function effectively. In this context, the Group's companies have established an Audit & Risk Committee¹², consisting of 3 non-executive members, two of whom are independent. Committee decisions shall not be made public..

Specifically, the Committee is responsible for supporting the BoDs of the Group's companies through the independent and objective monitoring of the ICS and procedures and, in particular, financial reporting, quality and risk management, the internal audit unit and the supervision of regular audit. Also, the Committee is responsible for regularly informing the Management submitting its recommendations/proposals related to monitoring the financial reporting process and the ICS and the procedures designed, implemented and monitored by the Management of the Group's companies.

More information is available in the 2022 Annual Report <https://oasa.gr>.

Procedure for the Selection and Nomination of the Members of the Board of Directors

GRI 2-9 (c-vii), GRI 2-10

The selection for the appointment of the Board of Directors of OASA members is carried out by the Shareholder (Growthfund) through the nomination committee. Specifically, within the framework of its responsibilities as sole shareholder, Growthfund evaluates and selects executives with collectively sufficient and differentiated experience to implement the strategic objectives of OASA and knowledge regarding the transport¹³ sector (relevant academic and work experience), which can therefore be used to mitigate the negative impacts, and respectively, to magnify the positive impacts created by the Group from its activities.

The BoD's composition of OASA considers the opinion of the Ministry of Economy and Finance and the employees, as they are represented in the BoD. OASA considers diversity, as it is in compliance with the Strategic Plan 2022-2024 of Growthfund, where 25% of the members of the BoD are women and ensures that there is independence of the members of the BoD, based on corporate governance law rules and policies to avoid conflicts of interest.

11. BoD Decision 5015/2024

12. BoD Decision 4954/2023

13. In accordance with the procedure set out in Article 197 (4) of the Law. 4389/2016

Evaluation and Training of BoD Members

GRI 2-17, GRI 2-18

Regarding the evaluation of the members of the BoD of OASA, Growthfund sets targets annually, including those related to the Group's sustainable development, which is monitored and evaluated through corresponding Key Performance Indicators (KPIs). The evaluation of performance in terms of targets indirectly concerns the members of the BoD since the bonus depends on the achievement of the targets. Specifically, performance is evaluated by Growthfund (either by the Portfolio Manager or by its Sustainable Development Team) on an annual basis at the end of each year, while within the year, audits are carried out on the progress of the implementation of the targets.

Following the evaluation, and depending on the performance achieved, it may be decided to accelerate and/or re-prioritize goals and actions and take corrective actions to enable the Group to align with the targets. Changes in the composition of the BoD and the adoption of practices and policies may also be made. However, any of the above corrective actions and implemented modifications are not the result of achieving these targets.

Finally, there is no framework for training and skills development of the members of the Board of Directors, but the members of the BoD, depending on their capacity, participate in seminars and e-learning programs organized by Growthfund and concern, among others, sustainable development.

Conflict of interest

GRI 2-15 (a)

Given the nature, activity and work of the Athens Transport Group, particular importance should be attached to avoiding and managing cases that constitute or may lead to conflict of interest. The Group makes specific reference to conflicts of interest in its Code of Ethics and Professional Conduct, which arise when the private or personal interests or relationships of an executive, employee or partner of the Group compete directly or indirectly with the interests of the Group.

Conflict of interest means any situation that may unfairly affect the Group's ability to act in the best interests of OASA and its subsidiaries in an objective and impartial manner. It is the obligation of all employees, both in the performance of their duties and when carrying out personal activities outside the Group, to avoid any conduct that constitutes a conflict of interest, as well as any conduct that could potentially constitute a situation of conflict of interest or, even, that may create such an impression.

In any case, all employees of the Group are obliged to investigate possible cases of conflict of interest within the framework within which they act. This concerns them personally, as well as their family members. In order to prevent actual or potential cases of conflict of interest, the Group prepares relevant policies for the avoidance of conflicts of interest, both for the members of the Board of Directors and for its other executives, employees and associates, which describe the rules and procedures for identifying and managing such situations.

All employees are required to be aware of the Group's policies that are applicable on a case-by-case basis, if any, as well as to immediately notify, in writing, the Company's Compliance Officer regarding their important own interests, which may be affected by transactions or decisions of the Group, as well as any other conflict of personal interests that arises in the exercise of their duties.

Determination of remuneration

GRI 2-19 (a-i, b), GRI 2-20 (a)

The companies of the Group have approved by the General Assembly¹⁴, a Remuneration Policy for the members of the BoD, which the Growthfund has approved. In the determination of remuneration, there was no participation of the independent members of the BoD of the Group's companies, nor was there an independent committee to oversee the process, nor was there the involvement of external consultants.

The Policy provides annual variable remuneration for the CEOs of OASA, OSY and STASY and the Deputy CEO - Executive Director of OASA¹⁵, which is linked to achieving specific goals, including those of sustainable development, which are equally distributed. More specifically, at least four (4) objectives are set based on the Growthfund Strategic Plan. Two (2) quality objectives, one related to improving corporate governance, and two (2) quantitative targets decided by the BoD of each company.

14. General Assembly Decision 1/2020 and 1/2023

15. In the year 2022, there was no O.A.S.A. Deputy CEO.

5.2 Business Ethics

Material topic: Business ethics



GRI 3-3

Financial Opportunities
From the existing anti-bribery and anti-corruption policies, as well as the ability of OASA to benefit from effective, accountable and inclusive institutions.
Financial Risks
Due to the absence of processes for shaping a responsible business culture based on business ethics.

Code of Ethics and Professional Conduct

GRI 2-23 (c,d,e,f), GRI 2-24

The Code of Ethics and Professional Conduct guides daily professional conduct for the Group's employees. Relevant policies, guidelines and procedures complement it and set out the ethical principles and values, as well as internal rules of ethics and ethical conduct that must be observed by all those with an employment or cooperation relationship with the Group. Through its Code of Ethics and Professional Conduct and policies, the Group limits potential financial risks due to the absence of responsible business culture processes.

The compliance and observance of the Code's values, principles and rules approved by the Board of Directors of OASA is the collective responsibility of all. The Code sets out guidelines for subsidiaries, which establish and implement independent policies and procedures to comply with their requirements, always in accordance with the Code's principles, values and rules.

However, as it is not possible to accurately address all possible situations and behaviours, employees must exercise good judgment and avoid inappropriate behavior. In order to ensure compliance with the Code, all employees, regardless of the time of their recruitment, are required to become fully familiar with its rules and principles, be trained accordingly, and commit to its observance by signing the Personal Commitment. Especially in STASY, all Executives have received training in the fields of regulatory compliance and business ethics, as well as the rest of the employees from the Compliance Officer.

Table 14: **Policies of the Athens Transport Group companies**

OASA	Anti-Corruption & Bribery Policy
	Policy against Violence and Harassment at Work
	Whistleblowing Policy
OSY	Gifts and Hospitality Policy
	Policy against Violence and Harassment
	Anti-Corruption and Bribery Policy
	Whistleblowing Policy
STASY	Regulatory Compliance System Framework
	Gifts and Hospitality Policy
	Sponsorship and Donation Policy
	Anti-Corruption and Bribery Policy
	Code of Ethics and Professional Conduct
	Policy against Violence and Harassment at Work
	Whistleblowing Policy
	Whistleblowing mechanism
Third-Party Due Diligence Policy (ongoing)	

Furthermore, OASA shapes the business ethics framework through the Charter of Obligations to the Consumer (COC)¹⁶. In particular, the COC defines the statutory obligations, the conditions under which the public undertaking provides its products or services to consumers, and the procedure for compensating them in case of non-compliance with the above obligations and terms. In addition to the above, the Directorates of OASA must take action to implement the principles of the Code, the commitments are highlighted in the operational plans and translated into projects and actions. Finally, OASA includes specific terms in the contracts, such as compliance with labor legislation by the contractor and proceeds to train employees on a case-by-case basis if the need arises.

The Code of Ethics and Professional Conduct, the COC and the policies of OASA are available on the website <https://www.oasa.gr/en/>, the policies of OSY are available on <https://www.osy.gr> and the Code of Ethics and Professional Conduct and policies of STA.SY are available on the website <https://www.stasy.gr/en/>

Reporting mechanisms

GRI 2-16, GRI 2-25 (b), GRI 2-26

The Group has developed a Reporting Policy to set the framework for the effective, transparent and fair process of disclosure and settlement of reports. The purpose of the Policy is to create the framework for the early detection of irregularities, omissions or criminal acts in the Group's operations. It also sets out the principles and operating framework under which the Group receives, manages and investigates reports of irregularities, omissions or other criminal acts that have come to the attention of its emissions or third parties and concerns:

- the members of the BoD
- Employees
- partners, suppliers and anyone providing services
- third parties who have relevant information about any unlawful acts

The Group takes all reports of possible misconduct seriously. In any case, the confidentiality of the report is ensured and an investigation is carried out to determine any violation. For each violation, the necessary corrective measures and relevant sanctions are taken, which are determined in accordance with the nature of the violation, the applicable law and the employment/cooperation contracts. The communication channels used by the Group's companies to collect requests and complaints are the following:

- Complaints management system for passengers (call center 11185, chatbot, complaint submission form on the OASA website)
- Contact/complaint form (websites OASA, STASY, OSY)
- Petition platform, accessible at <https://safevoice.Growthfund.gr>
- To be sent to the email address of each company [safevoice@\[\].gr](mailto:safevoice@[].gr)
- To be sent by post to the address of each company, to the attention of the Compliance Officer, with the indication "Confidential".
- This is to be submitted in writing or orally directly to the Compliance Officer of each company.

The above communication networks act as "hotlines" for reports and are available all days and hours of the week. Any expression of complaint, dissatisfaction, opinion and/or complaint not submitted through this reporting process may not be treated as a report by the Group companies.

The critical concerns of stakeholders are communicated to the Board of Directors of OASA through the management and the Audit Committee, which communicates internal audit reports and reports. In 2022, OASA received 59 recommendations, of which one was assessed as critical and concerned with commercial exploitation, while another 37 were assessed as high risk and concerned with fare controls and revenue management, procurement, commercial exploitation/handling, sales, adequacy of procedures and utilization of human resources. Also, in OSY, there were 243 complaints by bus and trolleybus passengers related to incidents of indecent behaviour, negligence, unexcused absence, cut-time, damage, non-compliance with timetables, and non-observance of orders, which were resolved by warning employees and training them on proper behaviour in the performance of their work.

The Reporting Policy is available here: <https://oasa.gr>, <https://www.osy.gr>, <https://www.stasy.gr/en/>

¹⁶ Every public enterprise that offers products or services to consumers is obliged to draw up and submit to the Interministerial Committee of Public Enterprises and Organizations, a Charter of Obligations to the Consumer (COC).

Bribery and Corruption

GRI 2-27, GRI 205-3, TR-RA-520a.1

Corruption and bribery are among the most severe and difficult topics facing modern entrepreneurship internationally, threatening good administration, undermining economic and social development and distorting free competition. The fulfilment of the Group's mission and the defence of its purpose, namely the provision of high-quality, safe and efficient passenger transport services, require high values and principles.

The requirements for integrity and transparency are exceptionally high and concern every aspect of the Group's operation. Any form of corruption or bribery, as well as behaviours, acts or omissions that could expose the Group to danger or even cause the mere suspicion of corruption or bribery, is not tolerated. The Group's companies, recognizing the importance of combating corruption and bribery but also wanting to demonstrate their non-negotiable commitment to zero tolerance to such phenomena, have established a "Policy against corruption and bribery".

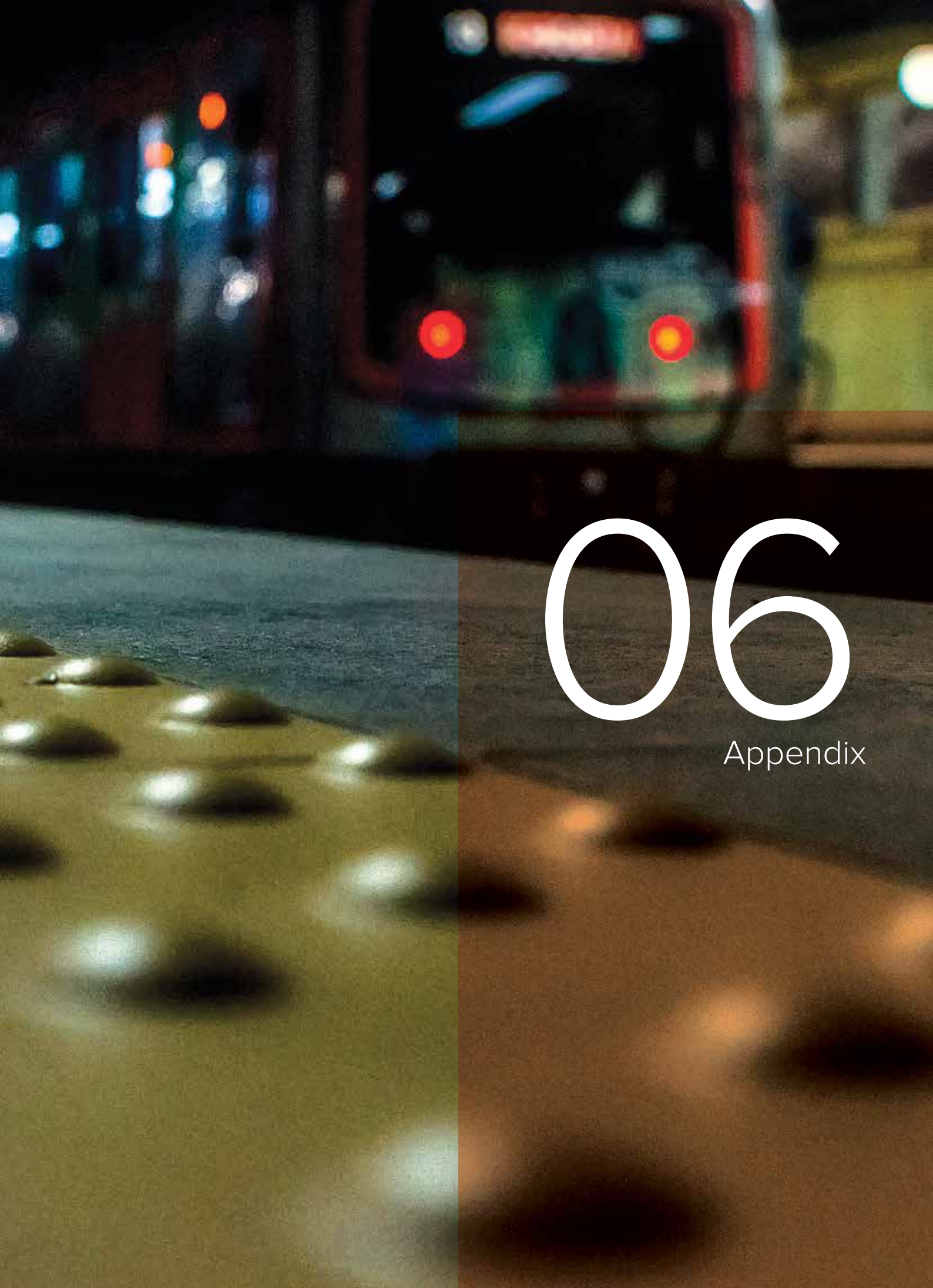
The Policy applies to all employees and associates of the Group's companies, regardless of position, including the members of the Board of Directors of each company, and also governs any other third party acting on their behalf.

The Policy clarifies that everyone must comply with the current legal and regulatory framework to combat corruption and bribery. The Group's companies prohibit any form of corruption and bribery and have zero tolerance for any behaviour or suspicion of behaviour that does not comply with the Policy.

In 2022, there were no violations of applicable legislation during the execution of the Group's activities. Regarding incidents of corruption, there was an incident in OASA that was dealt with by an unfavourable employee transfer, while in the subsidiary companies OSY and STASY, there were no confirmed incidents of corruption leading to the dismissal of employees. Also, no confirmed contract incidents with business partners in any Group's companies have led to termination or non-renewal due to corruption-related violations. There were also no public legal cases related to corruption brought against the Group or its employees, and there were no monetary damages as a result of legal proceedings related to unfair competition regulations.

The Anti-Corruption & Bribery Policy is available here <https://oasa.gr>, <https://www.osy.gr>, <https://www.osy.gr>





06

Appendix

6.1 About the Sustainability Report

GRI 2-2, GRI 2-3, GRI 2-4, GRI 2-5

This annual Sustainable Development Report is the 1st published by the Athens Transport Group (within the report "Group") and was published in 4.4.2024. The Report includes information related to the group's activities in Greece and Attica, in particular, including its subsidiaries Road Transport S.A. and Urban Rail Transport S.A., and it presents qualitative and quantitative information on its approach to management and its performance in sustainable development. The Group aims to inform its stakeholders about the impacts it creates or is likely to create on the environment, people and the economy and contribute to forming a basis for comparing its performance in sustainable development matters. The Report is published and available in electronic form on the company's website <https://www.oasa.gr/en/>.

This Report covers the reporting period from January 1, 2022, to December 31, 2022, in line with the annual financial reporting period. It has been drafted with reference to the GRI Standards 2021 sustainability reporting standards, taking into account the Road Transportation Sustainability Accounting Standard (edition 2018-10) and Rail Transportation Sustainability Accounting Standard (2018-10 edition), issued by SASB (Sustainability Accounting Standards Board). The Report takes into account the Group's broader contribution to the UN Sustainable Development Goals (SDGs).

More information on the content and materiality analysis of the Group's sustainable development topics is available on pages 29-35. The GRI Table of Contents is available on pages 75-77.

The Group has not proceeded with external assurance of the content of the Report, recognizes the importance of this process and is considering obtaining external assurance for the next Reports. There are also no recasts in this Report.

The Group considers the opinion of all stakeholders important in the content of this Report. For more information or clarifications, please contact the following contact details:

Email: oasa@oasa.com
Metsovou 15,
106 82 Athens

6.2 GRI Table of Contents

Statement of Use	Athens Transport Group includes information displayed in the following table of GRI contents for the reporting period 01/01/2022-31/12/2022, with reference to GRI standards 2021.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI sector standards	N/A

GRI Standard	Disclosure	Report Page /Citation
General disclosures		
GRI 2: General Disclosures 2021	2-1: Organizational details	9
	2-2: Entities included in the organization's sustainability reporting	74
	2-3: Reporting period, frequency and contact point	74
	2-4: Restatements of information	74
	2-5: External assurance	74
	2-6: Activities, value chain and other business relationships	9, 16-17
	2-7: Employees	45, 78
	2-8: (a,b): Workers who are not employees	45
	2-9: Governance structure and composition	68
	2-10: Nomination and selection of the highest governance body	68
	2-11: Chair of the highest governing body	68
	2-12 (a,b-i): Role of the highest governance body in overseeing the management of impacts	27
	2-13(a): Delegation of responsibility for managing impacts	27
	2-14: Role of the highest governance body in sustainability reporting	32
	2-15 (a): Conflicts of interest	69
	2-16: Communication of critical concerns	71
	2-17: Collective knowledge of the highest governance body	69
	2-18: Evaluation of the performance of the highest governance body	69
	2-19 (a-i,b): Remuneration policies	69
	2-20 (a): Process to determine remuneration	69
	2-21 (a,c): Annual total compensation ratio	46, 86
	2-22: Statement on sustainable development strategy	5
	2-23 (c,d,e,f): Policy commitments	70-71
	2-24: Embedding policy commitments	70-71
	2-25 (b): Processes to remediate negative impacts	71
	2-26: Mechanisms for seeking advice and raising concerns	71
	2-27: Compliance with laws and regulations	73
	2-28: Membership associations	17
	2-29: Approach to stakeholder engagement	28-29
	2-30: Collective bargaining agreements	45
Material topics		
GRI 3: Material Topics 2021	3-1: Process to determine material topics	29-34
	3-2: List of material topics	35

Material topic: Climate change mitigation		
GRI 3: Material Topics 2021	3-3: Management of material topics	37-39
GRI 302: Energy 2016	302-1: Energy consumption within the organization	37-38, 79
GRI 305: Emissions 2016	305-1: Direct (Scope 1) GHG emissions	37-38, 80
	305-2: Energy indirect (Scope 2) GHG emissions	37-38, 80
Internal Performance Indicator	Use of refrigerants	39,80
Material topic: Circular economy		
GRI 3: Material Topics 2021	3-3: Management of material topics	40-41
GRI 306: Waste 2020	306-1 (a-i): Waste generation and significant waste-related impacts	40-41
	306-2 (b,c): Management of significant waste-related impacts	40-41
	306-3: Waste generated	40, 81-82
Material topic: Working conditions and employee development		
GRI 3: Material Topics 2021	3-3: Management of material topics	44-57
GRI 401: Employment 2016	401-1: New employee hires and employee turnover	51, 82-83
	401-2 (a-ii, a-iv): Benefits provided to full-time employees that not provided to temporary or part-time employees	46
GRI 403: Occupational Health and Safety 2018	403-1: Occupational health and safety management system	52
	403-2: Hazard identification, risk assessment, and incident investigation	53
	403-3: Occupational health services	56
	403-4: Worker participation, consultation, and communication on health and safety	53
	403-5: Worker training on occupational health and safety	56
	403-6: Promotion of worker health	56
	403-7: Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	56
	403-9 (a,e,f): Work-related injuries	57, 84-85
GRI 404: Training and Education 2016	404-1 (a-i): Average hours of training per year per employee	49-50, 85
	404-2 (a): Programs for upgrading employee skills and transition assistance programs	49-50
GRI 405: Diversity and Equal Opportunity 2016	405-1 (b-i, ii): Diversity of governance bodies and employees	51-52, 86
	405-2: Ratio of basic salary and remuneration of women to men	48-49, 87
Material topic: Working conditions and human rights in the value chain		
GRI 3: Material Topics 2021	3-3: Management of material topics	44, 57
GRI 414: Social Supplier Evaluation 2016	414-1: New suppliers that were screened using social criteria	57
Material topic: Safety of passengers and users		
GRI 3: Material Topics 2021	3-3: Management of material topics	58-59
GRI 416: Consumer Health and Safety 2016	416-2 (a-i): Incidents of non-compliance concerning the health and safety impacts of products and services	58-59, 88

Material topic: Customer and user rights and privacy		
GRI 3: Material Topics 2021	3-3: Management of material topics	58-62
GRI 418: Customer Privacy 2016	418-1: Substantiated complaints concerning breaches of customer privacy and losses of customer data	62, 87-88
Material topic: Sustainable urban mobility		
GRI 3: Material Topics 2021	3-3: Management of material topics	58, 62-65
Internal Performance Indicator	Number of Routes	62-63
Internal Performance Indicator	Vehicle-kilometres	62-63
Internal Performance Indicator	Boardings	62-63
Internal Performance Indicator	Mileage network (km)	62-63
Internal Performance Indicator	Number of rows	62-63
Material topic: Business ethics		
GRI 3: Material Topics 2021	GRI 3: Material Topics 2021	70-72
GRI 205: Anti-corruption 2016	205-3: Confirmed incidents of corruption and actions taken	72

6.3 SASB Table of Contents

SASB Real Estate Index	Category	Report Page /Citation
Disclosures		
TR-RO-110a.1: Greenhouse Gas Emissions (Scope 1)	Quantitative	37-38
TR-RO-110a.3: (1) Total fuel consumed, (2) percentage of natural gas, (3) percentage of renewable energy	Quantitative	37
TR-RO-320a.1: (2) mortality rate for (a) direct employees	Quantitative	57
TR-RO-320a.2: (1) Voluntary and involuntary rotation rate for all employees	Quantitative	51-52
TR-RO-320a.3: Description of Approach to Management of Short and Long-Term Health Risks of Drivers	Quantitative	53-54
TR-RA-520a.1: Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behaviour regulations	Quantitative	72
TR-RO-540a.1: Number of road accidents and incidents	Quantitative	57

Material topic: Climate change mitigation

GRI Standards 2021	Disclosure	Unit of measurement	2022	2021	2020
STASY					
GRI 302-1	Energy Consumption within the Organization				
	Fuel consumption within the organization from non-renewable energy sources	MJ	12,233,891.85	14,938,123.77	12,865,852.76
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	657,417,481.20	582,759,532.80	490,686,814.80
	Total energy consumption within the organization	MJ	669,651,373.05	597,697,656.57	503,552,667.56
OSY					
GRI 302-1	Energy Consumption within the Organization				
	Fuel consumption within the organization from non-renewable energy sources	MJ	1,327,081,214.59	1,211,330,646.60	1,125,985,378.38
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	97,586,701.20	86,859,551.92	83,599,140.92
	Total energy consumption within the organization	MJ	1,424,667,915.79	1,298,190,198.51	1,209,584,519.31
OASA					
GRI 302-1	Energy Consumption within the Organization				
	Fuel consumption within the organization from non-renewable energy sources	MJ	482,299.71	490,841.29	370,521.08
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	1,001,408.40	983,444.40	1,009,947.60
	Total energy consumption within the organization	MJ	1,483,708.11	1,474,285.69	1,380,468.68
TOTAL					
GRI 302-1	Fuel consumption within the organization from non-renewable energy sources	MJ	1,339,797,406.15	1,226,759,611.66	1,139,221,752.22
	Fuel consumption within the organization from renewable energy sources	MJ	0	0	0
	Purchase and consumption of electricity	MJ	756,005,590.80	670,602,529.12	575,295,903.32
	Total energy consumption within the organization	MJ	2,095,802,996.95	1,897,362,140.77	1,714,517,655.55

Notes:

- The Group and its subsidiaries do not produce or sell energy.
- The ISO 14064 Report Template, the Ministry of Environment and Energy guidelines, and the 5th IPCC Report (Intergovernmental Panel on Climate Change) were considered for the calculation and methodology followed and the conversion factors used..

GRI Standards 2021	Disclosure	Unit of measurement	2022	2021	2020
STASY					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	tCO ₂ e	1,986.97	947.54	820.71
	Biogenic CO ₂ emissions	tCO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 market based)	tCO ₂ e	97,534.62	70,862.89	66,527.16
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	0.69	Not available Information	Not available Information
OSY					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	tCO ₂ e	110,638.17	96,152.63	79,079.15
	Biogenic CO ₂ emissions	tCO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 market based)	tCO ₂ e	14,477.99	10,562.02	11,334.35
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	11.22	7.49	Not available Information
OASA					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	tCO ₂ e	35.34	35.31	26.48
	Biogenic CO ₂ emissions	tCO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 market based)	tCO ₂ e	148.57	119.59	136.93
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	0.00035	Not available Information	Not available Information
TOTAL					
GRI 305-1	Direct Emissions (Scope 1)				
	Total direct greenhouse gas emissions	tCO ₂ e	112,660.48	97,135.48	79,926.34
	Biogenic CO ₂ emissions	tCO ₂ e	0	0	0
GRI 305-2	Indirect emissions from energy consumption (Scope 2)				
	Indirect greenhouse gas emissions (Scope 2 market based)	tCO ₂ e	112,161.18	81,544.50	77,998.44
Internal Performance Indicator: Use of refrigerants	Use of refrigerants				
	Refrigerants	t	11.91	7.49	Not available Information

Notes:

- 2022 was chosen as the base year for the calculation of direct Scope 1 greenhouse gas emissions and indirect Scope 2 greenhouse gas emissions (according to the Greek climate law). However, emissions have been recalculated for previous years using the methodology proposed by the Ministry of Environment and Energy.
- For the calculation of the direct greenhouse gas emissions Scope 1 within the company and the indirect greenhouse gas emissions Scope 2 market-based, the guidelines from the "ISO 14064 Report Template v.1.1.xlsm" prepared by the Ministry of Environment and Energy during the 5th IPCC Assessment are taken into account.
- Scope-based GHG emissions data (location-based) are not available.
- The consolidation method used is that of "Financial Control".

Material topic: Circular economy

GRI Standards 2021	Disclosure	Unit of measurement	2022	2021	2020
STASY					
GRI 306-3	Waste generated				
	Hazardous waste				
	13 02 05: Mineral-based non-chlorinated engine, gear and lubricating oils	t	5.43	4.24	1.52
	15 01 10: Packaging containing residues of or contaminated by hazardous substances	t	0.27	0.29	0.00
	15 02 02: Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances	t	1.59	2.18	0.00
	16 01 07: Oil filters	t	0.31	0.29	0.00
	16 02 11: Discarded equipment containing chlorofluorocarbons, HCFC, HFC	t	0.00	0.00	0.13
	16 02 13: Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	t	0.41	1.86	2.01
	16 02 15: Hazardous components removed from discarded equipment	t	0.23	0.20	0.08
	16 05 04: Gases in pressure containers (including halons) containing hazardous substances	t	1.36	3.32	0.00
	16 05 08: Discarded organic chemicals consisting of or containing hazardous substances	t	0.00	0.12	0.00
	16 06 01: Lead batteries	t	16.21	55.87	38.53
	16 06 02: Ni-Cd batteries	t	3.55	0.00	0.00
	16 06 06: Separately collected electrolyte from batteries and accumulators	t	0.00	0.20	0.00
	20 01 21: Fluorescent tubes and other mercury-containing waste	t	3.12	3.46	4.03
	20 01 23: Discarded equipment containing chlorofluorocarbons	t	0.00	0.00	1.08
	20 01 33: Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries	t	0.15	0.30	0.13
	20 01 35: Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components	t	0.31	0.20	18.74
	Total hazardous waste	t	32.94	72.62	66.25
	Non-hazardous waste				
	15 01 01: Paper and cardboard packaging	t	16.04	0.00	0.00
	15 01 02: Plastic packaging	t	133.84	0.00	0.00
	15 01 04: Metallic packaging	t	39.58	0.00	0.00
15 01 05: Composite packaging	t	0.73	0.00	0.00	
15 01 06: Mixed packaging	t	138.06	127.50	58.25	
15 01 07: Glass packaging	t	104.37	0.00	0.00	

2022 Sustainable Development Report

GRI 306-3	16 01 17: Ferrous metal	t	48.99	5.02	46.72
	16 01 18: Non-ferrous metal	t	0.00	0.48	0.00
	16 01 99: Wastes not otherwise specified	t	33.34	142	0.00
	16 01 20: Glass	t	0.00	0.00	7.02
	17 01 07: Mixtures of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	t	79.91	0.00	0.00
	17 04 02: Aluminium	t	0.00	2.57	0.00
	17 04 11: Cables other than those referred to in item 17 04 10	t	0.00	0.87	0.00
	20 01 36: Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	t	0.72	0.30	0.54
	20 01 40: Metals	t	0.00	209.20	32.53
	20 02 01: Biodegradable waste	t	231.10	232.20	83.55
	20 03 07: Bulky waste	t	0.00	0.00	13.88
	Total non-hazardous waste	t	826.68	720.14	242.49
	Total non-hazardous and hazardous waste	t	859.62	792.76	308.74

Note: The data were taken from the Electronic Waste Registry (HMA) and refer to waste management with waste disposal outside the facility (all waste is removed from the facilities by properly licensed collectors for further management in an appropriately licensed facility).

Material topic: Working conditions and employee development

GRI Standards 2021	Disclosure	Unit of measurement	<30 years old			30-50 years			>50 years old		
			Women	Men	Total	Women	Men	Total	Women	Men	Total
GRI 401-1	2022										
	New hires and turnover of employees										
	OASA										
	Number of employees	#	0	0	0	24	26	50	30	23	53
	Number of new employee hires	#	0	0	0	2	3	5	0	0	0
	Rate of new hires	%	0.00	0.00	0.00	8.33	11.54	10.00	0.00	0.00	0.00
	Number of employee turnover	#	0	0	0	1	0	1	0	6	6
	Rate of employee turnover	%	0.00	0.00	0.00	4.17	0.00	2.00	0.00	26.09	11.32
	OSY										
	Number of employees	#	4	22	26	88	2,032	2,120	73	2,555	2,628
	Number of new employee hires	#	1	4	5	1	33	34	0	0	0
	Rate of new hires	%	25.00	18.18	19.23	1.14	1.62	1.60	0.00	0.00	0.00
	Number of employee turnover	#	0	7	7	2	50	52	4	119	123
	Rate of employee turnover	%	0.00	31.82	26.92	2.27	2.46	2.45	5.48	4.66	4.68
	STASY										
	Number of employees	#	9	24	33	327	1,155	1,482	158	646	804
	Number of new employee hires	#	1	1	2	4	6	10	6	4	10
	Rate of new hires	%	11.11	4.17	6.06	1.22	0.52	0.67	3.80	0.62	1.24
	Number of employee turnover	#	0	0	0	2	4	6	5	47	52
	Rate of employee turnover	%	0.00	0.00	0.00	0.61	0.35	0.40	3.16	7.28	6.47

		TOTAL								
Number of employees	#	13	46	59	439	3,213	3,652	261	3,224	3,485
Number of new employee hires	#	2	5	7	7	42	49	6	4	10
Rate of new hires	%	15.38	10.87	11.86	1.59	1.31	1.34	2.30	0.12	0.29
Number of employee turnover	#	0	7	7	5	54	59	9	172	181
Rate of employee turnover	%	0.00	15.22	11.86	1.14	1.68	1.62	0.35	5.33	5.19
2021										
New hires and turnover of employees										
OSY										
Number of employees	#	4	34	38	97	2,268	2,365	67	2,451	2,518
Number of new employee hires	#	4	41	45	12	387	399	1	0	1
Rate of new hires	%	100.00	120.59	118.42	12.37	17.06	16.87	1.49	0.00	0.04
Number of employee turnover	#	0	6	6	4	70	74	1	97	98
Rate of employee turnover	%	0.00	17.65	15.79	4.12	3.09	3.13	1.49	3.96	3.89
STASY										
Number of employees	#	1	18	19	361	1,245	1,606	141	624	765
Number of new employee hires	#	2	16	18	6	131	137	0	0	0
Rate of new hires	%	200	88.89	94.75	1.66	10.52	8.53	0.00	0.00	0.00
Number of employee turnover	#	0	0	0	0	0	0	2	41	43
Rate of employee turnover	%	0.00	0.00	0.00	0.00	0.00	0.00	1.42	6.57	5.62
2020										
New hires and turnover of employees										
OSY										
Number of employees	#	0	0	0	102	2,260	2,362	55	2,235	2,290
Number of new employee hires	#	0	0	0	2	7	9	1	6	7
Rate of new hires	%	0.00	0.00	0.00	1.96	0.31	0.38	1.82	0.27	0.31
Number of employee turnover	#	0	1	1	5	53	58	2	91	93
Rate of employee turnover	%	0.00	0.00	0.00	4.90	2.35	2.46	3.64	4.07	4.06
STASY										
Number of employees	#	0	0	0	415	1,226	1,641	137	595	732
Number of new employee hires	#	0	0	0	1	2	3	1	2	3
Rate of new hires	%	0.00	0.00	0.00	0.24	0.16	0.18	0.73	0.34	0.13
Number of employee turnover	#	0	0	0	0	0	0	6	40	46
Rate of employee turnover	%	0.00	0.00	0.00	0.00	0.00	0.00	4.38	6.72	6.28

Note: OASA data are not available for 2020 and 2021.

GRI Standards 2021	Disclosure	Unit of Measurement	2022	2021	2020
GRI 403-9	OASA				
	Workplace-related injuries				
	Employees				
	Number of hours worked	#	187,488	189,224	Not available information
	Number of fatalities as a result of work-related injury	#	0	0	
	Rate of fatalities as a result of work-related injury	%	0.00	0.00	
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	
	Number of recordable work-related injury	#	0	0	
	Rate of recordable work-related injuries (IR)	%	0,00	0,00	
	Workers who are not employees				
	Number of hours worked	#	24,496.5	20,869.5	Not available information
	Number of fatalities as a result of work-related injury	#	0	0	
	Rate of fatalities as a result of work-related injury	%	0.00	0.00	
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	
	Number of recordable work-related injury	#	0	0	
	Rate of recordable work-related injuries (IR)	%	0.00	0.00	
	OSY				
	Number of recordable work-related injury	#	15	20	23
	STASY				
	Workplace-related injuries				
	Employees				
	Number of hours worked	#	4,090,228	4,071,333	3,970,476
	Number of fatalities as a result of work-related injury	#	0	1	0
	Rate of fatalities as a result of work-related injury	%	0.00	0.25	0.00
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	0
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	0.00
Number of recordable work-related injury	#	16	17	15	
Rate of recordable work-related injuries (IR)	%	3.91	4.18	3.78	

	TOTAL				
	Employees				
GRI 403-9	Number of hours worked (O.A.S.A and STASY)	#	4,277,716	4,260,557	3,970,476
	Number of fatalities as a result of work-related injury (OASA and STASY)	#	0	1	0
	Rate of fatalities as a result of work-related injury (OASA and STASY)	%	0.00	0.25	0.00
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	0
	Rate of high-consequence work-related injuries (excluding fatalities) (OASA and STASY)	%	0.00	0.00	0.00
	Number of recordable work-related injury (O.A.S.A, OSY and STASY)	#	31	37	38
	Rate of recordable work-related injuries (IR) (OASA and STASY)	%	3.91	4.18	3.78
	Workers who are not employees				
	Number of hours worked	#	24,496.5	20,869.5	Not available information
	Number of fatalities as a result of work-related injury	#	0	0	
	Rate of fatalities as a result of work-related injury	%	0.00	0.00	
	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0	
	Rate of high-consequence work-related injuries (excluding fatalities)	%	0.00	0.00	
	Number of recordable work-related injury	#	0	0	
Rate of recordable work-related injuries (IR)	%	0.00	0.00		

Note:

- For the calculation of the indicator "Recorded workplace-related injuries (recordable)" of the publication GRI 403-9, the coefficient of 1,000,000 hours worked was used based on the number of employees for OSY and STASY and the coefficient of 200,000 hours worked for OASA.
- No group of employees is excluded from being reflected in the company's performance on Health and Safety topics; the data are collected using reporting tools and in cooperation with safety technicians.

GRI Standards 2021	Disclosure	Unit of measurement	2022	
			Women	Men
GRI 404-1	Average hours of training per employee			
	OASA			
	Average hours of training per employee	#	7.98	2.96
	OSY			
	Average hours of training per employee	#	2.25	1.49
	STASY			
	Average hours of training per employee	#	29.87	14.72
TOTAL				
Average hours of training per employee	#	20.19	9.36	

Material topic: Diversity and equal opportunities

GRI Standards 2021	Disclosure	Unit of measurement	2022
GRI 2-21	Annual total compensation ratio (CEO/Employees)		
	OSY		
	Annual total compensation ratio	#	2.81
	STASY		
	Annual total compensation ratio	#	3.32
	OASA		
Annual total compensation ratio	#	4.01	

Notes:

- The annual total remuneration of the Managing Directors includes the salary based on a uniform salary scale (level of education, marital status and number of children).
- The annual earnings of employees include the salary based on a uniform payroll (level of education, marital status and the number of children) and variable earnings from overtime.
- The ratio of CEO and employee compensation was calculated for the first time in 2022, therefore, the change in the annual total compensation ratio is not captured.

GRI Standards 2021	Disclosure	Unit of measurement	<30 years old			30-50 years			>50 years old		
			Women	Men	Total	Women	Men	Total	Women	Men	Total
GRI 405-1	Diversity of Board of Directors										
	2022										
	OASA										
	Board of Directors	%	0	0	0	0	0	0	25	75	100
	OSY										
	Board of Directors	%	0	0	0	0	100	100	0	100	100
	STASY										
	Board of Directors	%	0	0	0	0	100	100	100	0	100
	Employee diversity										
	By employee level										
	OASA										
	Directors	%	0	0	0	0	0	0	50	50	100
	Directors	%	0	0	0	47.83	52.17	100	51.85	48.15	100
	OSY										
	By function										
	Executives	%	100	0	0	42.98	57.02	100	25.13	74.87	100
	Production executives	%	13.64	86.36	100	2.05	97.95	100	1.03	98.87	100
	Technical	%	0	100	100	0.77	99.23	100	1.19	99.81	100
	STASY										
	By function										
Executives	%	0	0	0	43.24	56.76	100	27.03	72.97	100	
Operation	%	13.33	86.67	100	22.80	77.20	100	17.52	82.48	100	
Technical	%	0	100	100	3.37	96.63	100	3.12	96.88	100	
Administrative	%	0	0	0	56.11	43.89	100	46.77	53.23	100	

Note: The number of employees of STASY used to complete the GRI 405-1 disclosure differs from those of the GRI 2-7 disclosure as the data were recorded on a different date and the company's workforce changes frequently.

GRI Standards 2021	Disclosure	2022	2021	2020
GRI 405-2	Ratio of basic salary and earnings of women to men			
	By employee level			
	OASA			
	Management	0.83	Not available information	
	Employees	1.09		
	Total	1.06		
	OSY			
	Senior Management	0.99	0.95	0.96
	Middle Management	1.02	1.01	1.02
	Employees	Not available information		
	Total	1,03	1,01	1,03
	Ανά λειτουργία			
	STASY			
	Executives	0.96	0.97	0.97
	Operation	0.94	0.96	0.96
	Technical	0.95	0.97	0.83
	Administrative	0.92	0.97	0.85
Total	0.94	0.98	0.98	

Note:

- For OASA, the data are reflected per hierarchy level, the basic salary data of women/men per function for the year 2022 were not available, as well as the data in their entirety for the years 2020 and 2021.
- For OSY data reported by the hierarchy level, women/men basic salary data at the employee level were not available for 2020, 2021, and 2022, and for women/men basic salary data per function.
- For STASY, data are reported per function; basic salary data for women/men per hierarchy level for the year 2022 were not available.

Material topic: Customer and user rights and privacy

GRI Standards 2021	Disclosure	Unit of measurement	2022	2021	2020
GRI 418-1	Substantiated complaints about customer privacy breaches and customer data losses				
	OASA				
	Total number of substantiated complaints received from outside parties and substantiated by the organization concerning breaches of customer privacy	#	0	0	Not available information
	Total number of substantiated complaints received from regulatory bodies concerning breaches of customer privacy	#	0	0	
	Total number of identified leaks, thefts or losses of customer data	#	0	0	
	OSY				
Total number of substantiated complaints received from outside parties and substantiated by the organization concerning breaches of customer privacy	#	0	0	Not available information	

GRI 418-1	Total number of substantiated complaints received from regulatory bodies concerning breaches of customer privacy	#	0	0	Not available information
	Total number of identified leaks, thefts or losses of customer data	#	0	0	Not available information
	STASY				
	Total number of substantiated complaints received from outside parties and substantiated by the organization concerning breaches of customer privacy	#	0	0	0
	Total number of substantiated complaints received from regulatory bodies concerning breaches of customer privacy	#	0	0	0
	Total number of identified leaks, thefts or losses of customer data	#	0	0	0
	TOTAL				
	Total number of substantiated complaints received from outside parties and substantiated by the organization concerning breaches of customer privacy	#	0	0	0
	Total number of substantiated complaints received from regulatory bodies concerning breaches of customer privacy	#	0	0	0
	Total number of identified leaks, thefts or losses of customer data	#	0	0	0

Material topic: Safety of passengers and users

GRI Standards 2021	Disclosure	Unit of measurement	2022
GRI 416-2	Total number of incidents of non-compliance with regulations and/or voluntary codes concerning the health and safety impacts of products and services		
	OSY		
	Incidents of non-compliance with regulations resulting in a fine or penalties	#	1

Notes:

- The GRI 416-2 disclosure requirements do not apply to OASA, as its operation includes administrative activities.
- No data are available for STASY for 2020, 2021, and 2022.
- No data are available for OSY for the year 2020.





