

Sustainability Policy

Sustainable development is a priority for all countries and sectors of activity worldwide. The financial sector can make a crucial contribution to the global sustainability agenda through the strengthening of sustainable financing and the allocation of capital to sustainable initiatives. For the Athens Exchange Group (ATHEX Group), sustainable development constitutes a multi-level action and a broad framework of practices.

“We incorporate environmental, social and governance (ESG) factors in our corporate strategy, commitments and actions. We operate responsibly, constantly evolving, in alignment with national and global guidelines and standards relating to Sustainable Development, based on respect and the creation of value for all our stakeholders.”

Pillars of Sustainable Development

The priorities of ATHEX Group in matters of Sustainable Development are structured around five strategic pillars:

1. Social responsibility / People and society

The ATHEX Group attaches primary importance to the social axis that governs its activities, since it is directly linked to the creation of value for its people and the wider society in which it operates. In this framework, it focuses on the following areas:

- **Human resources**

Our people are the Group's greatest asset. We seek to develop and maintain a merit-based work environment that supports the development and advancement of all our employees.

We place emphasis on the provision of equal opportunities, respect for human rights, and ensuring the health, safety and well-being of employees. Our goal is to be an employer of choice for experienced professionals and talented young people.

The Group has adopted and implements a Code of Business Ethics that sets out the framework of ethical operation and conduct which governs our activities. This Code serves as the basis for all interactions of the Group's employees, both internally and externally, while at the same time detailing the responsibility with which it treats its people and immediate associates.

- **Society**

Through targeted actions, we remain active participants in the society in which we operate, contributing by means of volunteer initiatives and partnerships to a wide range of projects in support of our fellow humans.

We devise and implement actions in line with the Group's strategic social responsibility plan, strengthening non-profit organizations and public bodies which are geared to bolstering local communities and protecting vulnerable social groups. We respond with a sense of solidarity and social responsibility to emergency situations (e.g. the pandemic), in addition to those actions already foreseen in the strategic plan.

2. Corporate governance

The Group recognizes the importance of the system of corporate governance principles, as well as the benefits that accrue from their proper application. With the aim of creating further value for shareholders, in all the operations of the Group and with our strong corporate structure as a guide, we implement a framework of good corporate governance which enables us to build relationships of trust and mutual benefit with investors. By adopting international practices, we comply with legislation in force and implement strict control procedures to ensure regulatory compliance.

The Group follows commercial, organizational and operating practices in accordance with the rules, legislation and regulations prescribed by national and European supervisory authorities and takes all necessary steps to secure the relevant licenses required for its products, services and operations.

We have adopted the Hellenic Corporate Governance Code for listed companies and formulate relevant policies and procedures, while also taking appropriate measures that allow the Group to carry out its activities with responsibility, reliability and transparency, preventing and combatting all kinds of corruption.

We have set high standards of ethical conduct and take a zero-tolerance approach to instances of fraud, corruption and market abuse, implementing all necessary measures to monitor, prevent and deal with any such instances across the entire spectrum of the Group's activities.

We evaluate and manage business risks with the aim of safeguarding the interests of all our stakeholders.

In addition, we are eager to participate in international bodies and organizations which promote the principles of sustainable development, such as the Sustainable Stock Exchanges (SSE) initiative of the United Nations.

3. Environmental responsibility

We operate responsibly towards the environment and the use of natural resources. We are committed to undertaking actions and developing initiatives aimed at protecting the environment and reducing our environmental footprint.

In the framework of the UN Sustainable Development Goals (SDG s), the Paris Agreement on climate change (2015) and the European Green Deal (2019), the monitoring of international developments, the improvement of the Group's environmental performance and the identification of the risks and opportunities arising from climate change are key areas for the further strengthening of our environmental policy.

4. Promotion of non-financial reporting

Acknowledging the importance of the role that financial sector operators are called to play for the transition to a greener and more sustainable economy, the Group has undertaken the development of initiatives to promote non-financial reporting on environmental, social and governance (ESG) issues. In the framework of its participation in the UN Sustainable Stock Exchanges initiative, the Group has created the ESG Reporting Guide, a practical tool for listed and unlisted companies. The Group participates in actions aimed at providing information and disseminating international best practices for the growth of sustainable investments in the Greek market and supports initiatives such as the European Commission's action plan on sustainable finance, with the goal of strengthening its engagement in sustainable development issues.

5. Promotion of responsible operation & synergies

The Group recognizes the vital importance of the role it plays and takes steps to promote stock market education and improve the financial and non-financial literacy of listed and unlisted companies, young people, and participants in our markets in general. By undertaking a series of relevant actions, the Group's goal is to enable

them to successfully respond to the demands of a constantly changing national and international environment.

In this framework, our efforts are focused on strengthening the stock market culture and disseminating knowledge that is essential for the taking of financially responsible decisions. Moreover, this pillar is in line with the Group's strategic priorities and international trends towards responsible operation aimed at sustainable development. Against this background, we strengthen synergies and are committed to promoting the values and benefits of responsible entrepreneurship.

Scope of the policy

This policy applies to all of the Group's subsidiary companies and immediate associates. The Group encourages not only contractors, suppliers, associates, consultants and other business partners, but also listed companies, to respect and adopt the principles set out in this policy.