

The background image shows a fleet of white and blue EYDAP trucks and cars parked in a lot. In the foreground, a group of workers wearing high-visibility yellow jackets and hard hats are standing in a line. The background features a body of water, trees, and a tall industrial chimney under a blue sky with clouds.

HUMAN RIGHTS POLICY

NOVEMBER 2022

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1. PURPOSE AND BASIC PRINCIPLES

EYDAP SA (hereinafter referred to as the Company) is the largest company in Greece in the water market, a company that operates on the basis of responsibility, expertise and is oriented towards People and the Environment. It has been managing for decades with consistency and efficiency, the water cycle, supplying quality and cheap drinking water to an ever increasing part of Attica, which is then returned clean back to the environment.

The Company's vision is to remain the largest and most reliable Company in Greece in the management of the water cycle and in particular in the provision of water supply, sewerage and wastewater treatment services, always oriented towards People and the Environment.

In this context, the Company highlights the concepts of respect and protection, acting with absolute respect for human rights, both on an individual and collective level. In its operations, it is committed to the protection of human rights, taking preventive actions in order to avoid acts and/or omissions that may be detrimental to human rights.

The primary purpose of this Policy is to raise awareness and ensure the commitment of all those employed by the Company, whether as employees or non-employees, suppliers or subsidiaries, to the Company.

It is important to note that the Company has zero tolerance for behavior and situations that violate human rights and avoids doing business with persons who have a proven track record of being involved in cases of human rights violations.

The Company fully complies with the requirements of Greek and EU legislation and human rights standards. In particular, this Policy is based on the following:

- Fundamental principles of the Greek Constitution
- Principles of the United Nations Universal Declaration of Human Rights
- European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR)
- Charter of Fundamental Rights of the European Union (2000/C 364/01)
- Convention 108 of the Council of Europe and its updates
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact (UNGC)
- OECD Guidelines for Multinational Enterprises
- Declaration on Fundamental Principles and Rights at Work of the International Labor Organization
- International Standard on Social Accountability 8000 (SA 8000)



2. FIELD OF APPLICATION

This Policy applies to the Company and any existing or future subsidiary.

In particular, the following are bound by the contents of this Policy:

- a. Personnel employed by the Company under a contract of employment
- b. Personnel providing services to the Company under a service contract or otherwise independently.
- c. Members of the Company's Board of Directors
- d. The Company's other partners (contractors, suppliers, service providers, etc.)

3. RESPECT AND PROTECTION OF LABOR & SOCIAL HUMAN RIGHTS

3.1. LABOR RIGHTS

3.1.1. Working conditions - basic principles

The Company provides its employees and executives with working conditions that are consistent with its operation and related to the respective duties of each employee. It maintains an open dialogue with its staff to resolve any cooperation problems within the framework of the applicable labor and insurance legislation and the relevant Collective Labor Agreements.

In its effort to keep staff on standby around the clock, given the ceaseless nature of the services it provides to consumers and the need to immediately resolve any emergency (weather, infrastructure, accident, etc.), it takes the optimal decisions to achieve the above.

Employees have the right to be informed and to have access to their pay slips and their remuneration in general and to any clarifications requested in this respect.

3.1.2. Health and safety

For the Company, defending and ensuring the health and safety of its employees and third parties (contractors, service providers, etc.) is a paramount obligation. To this end, it establishes policies, adopts and implements high standards of health and safety in the workplace, regularly evaluating them and managing the risks involved.

The Company provides access to drinking and clean water, sanitary and dining facilities and special changing rooms, depending on the nature of the employees' work.

The Company's primary objective is to provide work with the minimum risk of accident or injury or exposure to health hazards. To this end, all measures are observed to avoid and minimize these.

In order to ensure the above, systematic information is provided to the Company's employees, its contractors and their employees regarding the protection measures applied in the Company, such as Personal and Group Protection Means, etc.

Safety guarantees are provided to employees with respect to their privacy and dignity.

3.1.3. Security of facilities

The Company is committed that its contracts with private security companies include the requirements of national and EU legislation and international standards for the protection of human rights, law enforcement and the use of force. At the same time, it takes note of any illegal or abusive behaviour by its security guards and allows for the termination of the contract in case of such conduct.

3.1.4. Right to organize and collective bargaining

The Company fully respects and complies with the entire legal framework regarding the right to organize and collective bargaining. It ensures that employees who participate in trade unions are not treated differently. The Company fosters dialogue and negotiations in good faith with legally recognized unions.

3.1.5. Tackling unlawful disciplinary practices

In the event that an employee of the Company is found guilty of disciplinary misconduct, the Company shall ensure that the employee has the opportunity to express his/her arguments and defend his/her position before disciplinary action is taken. In any case, the disciplinary measures that may be imposed shall be in accordance with applicable national and EU legislation and shall not include actions that violate human rights at work (e.g. use of violence, punitive work, etc.).

The Company does not tolerate the imposition of unlawful disciplinary sanctions on the personnel of third parties (contractors, partners, etc.) involved in the operation or implementation of its projects.

3.2. SOCIAL HUMAN RIGHTS

3.2.1. Prohibition of discrimination and violence/harassment at work

The Company respects and promotes diversity and equal opportunities for all, regardless of race, religion, nationality or ethnicity, class, color, age, gender, disability, marital or economic status, sexual orientation or gender identity, political opinion or any other situation that is protected by national, EU or international law.

Furthermore, it is noted that the Company does not tolerate any form of verbal, physical, psychological or sexual violence and harassment, threats and intimidation. Individuals who exhibit such behaviour will be immediately and permanently removed from the Company and will be reported to the relevant criminal authorities.

The Company shows zero tolerance to discriminatory behaviour and violence/harassment from wherever it originates, fully complying with the requirements of the *Policy for the Prevention and Combating of Violence and Harassment at Work* approved by the Board of Directors.

3.2.2. Slavery, forced labor, child labor and human trafficking

The Company condemns and prohibits the use of any form of forced or compulsory labor, labor under onerous conditions or slavery and human trafficking, taking all necessary measures to this end. At the same time, it recognizes its responsibility to remain aware of any relevant risks within its activities.

In addition, the Company respects the laws on the minimum age of employment and does not employ persons below the age limit. In any case, the Company does not employ young people under the age of 18 in hazardous or night work.

The Company, as part of its voluntary commitment to comply with the principles and requirements of the SA 8000 International Standard, is committed to and complies with Principle 5 of the United Nations Global Compact, which is based on zero tolerance of child labor incidents and conditions throughout its operations.

It is noted that all employees of the Company have employment contracts, if employed on a dependent employment basis, which are drafted and signed in a language they understand and which contain all agreed terms and conditions of employment.

3.2.3. Protection of personal data

The Company complying with the provisions of the applicable legislation on the protection of personal data of individuals, ensures that appropriate technical and organizational measures and safeguards are in place to ensure that:

- (a) by definition, the privacy of natural persons is respected and only personal data that are strictly necessary are processed;
- (b) all processing is governed by certain principles, pursuant to Article 5 of the General Data Protection Regulation (EU) 2016/679, namely the principles of lawfulness, objectivity and transparency, purpose limitation, proportionality (data minimization), data accuracy, the principle of determining the duration of processing, the principle of integrity and confidentiality and the principle of accountability of the Company,
- (c) the possibility and procedures for exercising the rights of natural persons (information, access, opposition, erasure, restriction, portability) are in place;
- (d) every effort is made to prevent any form of external or internal action that would result in the alteration, loss, destruction of personal data and unauthorized access by third parties.

3.2.4. Fight against corruption

The Company fights corruption and prohibits any form of bribery or extortion, as defined in the Anti-Corruption and Anti-Bribery Policy approved by the Board of Directors.

3.2.5. Protecting local communities and the environment

The Company takes all necessary measures to protect the environment and avoids actions that could endanger both the environment and local communities. It encourages the development and dissemination of environmentally friendly technologies, while promoting environmental responsibility.

The Company develops and promotes activities and executes projects with respect for local communities. In this context, dialogue and consultation with representatives of local communities is encouraged, when necessary, in order to achieve cooperation in the development of actions, investments and decisions that can affect their economic and social progress.

3.2.6. Corporate Social Responsibility (CSR)

The Company operates with social responsibility, accountability and transparency. The Company's business actions are carried out with responsibility towards the environment and society. People, respect for human values and commitment to the principles of sustainable development are a priority for the Company and a prerequisite for its sustainable business activities. Therefore, the principles of Corporate Social Responsibility (CSR) are the cornerstone of any planned strategy focusing on employee development, social welfare, transparency, moral integrity, quality of services and environmental protection at every level of the Company's operation.

With respect to the principles of CSR, the Company follows the relevant Sustainable Development Policy, incorporating the criteria E (Environment), S (Society), G (Governance).

4. FINAL PROVISIONS

4.1. Monitoring and evaluation of the implementation of the Policy

The Company ensures that it identifies and prevents situations that endanger human rights by informing and training all its staff and other associates, in accordance with this Policy.

Monitoring and evaluating the faithful observance of the principles of this Policy and its effectiveness is important for the safeguarding of human rights, both social and labor.

The Risk Management and Regulatory Compliance Department will be responsible for the compliance and effective implementation of this Policy.

4.2. Reporting Policy Violations

This Company Policy must be strictly observed by everyone without exception. No violation will be accepted and in fact, in case of violation of its principles, the procedure for the imposition of legal sanctions will be activated.

In the event that a principle related to human rights is indeed violated or there is a reasonable suspicion thereof, then the relevant report/complaint should be submitted to the Company in accordance with the *Whistleblowing Policy*, the *Policy on Prevention and Combating of Violence and Harassment at Work* as well as this Policy.

4.3. Adoption and review of the Policy

Under the responsibility of the Executive Division of Human Resources, this Policy is communicated to the Company's employees and posted on the Company's website www.eydap.gr.

This Policy is approved by the Board of Directors, reviewed annually by the Risk Management and Compliance Division and revised if and when required. The Risk Management and Compliance Division is responsible for preparing and proposing the revision for approval.