




# SUSTAINABILITY REPORT 2022

EYDAP in terms of equality information for people with visual impairment, developed a brief summary in Greek of the Sustainability Report in format talking form, available (on the website) **[www.eydap.gr](http://www.eydap.gr)**





Our vision is to be the most reliable company in the management of the water cycle, always oriented towards people and the environment.





Opening of the passage pipeline of Rafina-Pikermi and Spata-Artemis WWTP extending



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# MESSAGE FROM THE MANAGEMENT

## Dear Friends,

The pursuit of sustainable development, the sustainable management of water and the implementation of responsible environmental practices for the benefit of customers, society, shareholders and the environment, are at the heart of EYDAP.

For all of us who are responsible for the operation and development of the country's largest water and sewerage utility, the pursuit of sustainable development is our daily business. It is not an exception to corporate policy, nor even a separate direction, it is a key direction that guides our operations.

Sustainable development, along with the dynamic triptych of **Safety-Efficiency-Growth**, defines the Company's strategic axes. This is our business.

It is with great pride that we present another **Sustainable Development Report**, which documents everything we do, everything we have achieved in our journey towards achieving a zero carbon footprint in the water cycle, the provision of quality water to all, the development of sewerage and wastewater treatment projects in East Attica, thanks to the collective effort aimed at the development of our Company with care for the environment, people and society.

The most significant thing, however, is not what we have achieved in the past year, but mainly that even in times of challenges due to energy costs and inflationary pressures, we remain committed to our sustainability goals, absorbing impacts and supporting society and the environment through planning, determination, strategy and dedication.

It could not be any other way, because EYDAP's operation is at the heart of the circular economy, with the utilization of biogas and recycled water, as we respect the environment and the resources we manage, for which we feel we have a responsibility towards future generations.

In this report, all that we do for the environment, local communities, employees and other stakeholders has been compiled based on our internationally established standards. What we present today in this comprehensive report is another decisive step in our ongoing collective effort. All of us working for the creative present and dynamic future of EYDAP have adopted sustainability principles and goals and we are optimistic that we will achieve them. We continue our mission with vigour, dedication and determination for a better world, protecting the environment, ensuring that most precious thing in life, clean water.

**The Chief Executive Officer**  
**Harry Sachinis**

**The President of the Board**  
**George Stergiou**



# ABOUT THE REPORT

The Sustainable Development Report of the Water and Sewerage Company EYDAP with the distinctive title EYDAP SA (hereinafter referred to as the "Company" or "EYDAP"), which is issued on an annual basis, includes a review of its economic, social and environmental performance (ESG) from 1.1.2022 to 31.12.2022.

The Sustainability Report has been prepared in accordance with the guidelines of the Global Reporting Initiatives (GRI) sustainability reporting initiative, in order to meet the needs of its stakeholders and to present how the Company manages its most material impacts in the context of sustainability and long-term value creation.

The Company's impacts were assessed against the UN Global Sustainable Development Goals on a national basis. In 2023, EYDAP implemented a materiality analysis to identify significant issues for its Sustainable Development. The Process Analysis is available at Chapter 2 on pages 48-55.

The material topics defined the content of this year's Report, as defined by international standards and initiatives. In addition to the GRI guidelines, the analysis of the management of the topics is consistent with the principles of the Sustainability Accounting Standards Board (SASB) and specifically with the material topics of the "Water Utility and Services" sector as well as the Athens Stock Exchange's "ESG Indicators of the Athens Stock Exchange" Guide for the disclosure of non-financial information. The Tables of Contents of the Standards with the relevant references to the Report can be found on pages 254-278.

**Information has been revised compared to that published in the 2021 report in the calculation of carbon footprint and in the calculation of the fixed term employees. The changes in the measurement methodology are explained in the respective sections.**

EYDAP acknowledges the importance of the external assurance of the Sustainable Development Report 2022 and aiming at transparency and enhancing the reliability of the information provided, has entrusted the external assurance of selected elements of the Report to Grant Thornton Greece. The Independent Auditor's Limited Assurance Report for the Annual Sustainable Development Report of EYDAP can be found on page 279-282. The process of selecting, monitoring the independence and effectiveness of the external auditors was carried out in accordance with regulatory requirements (Annual Report page 95).

The Company issues the Annual Financial Report for the same period (from 1.1.2022 to 31.12.2022), in accordance with international financial reporting standards (IFRS) & Law 3556 /2007, where the report for the annual period is presented with a reference to the significant events that took place during the Financial Year 2022 and their impact on the Financial Statements of the same period, describing the main risks and uncertainties and listing the significant transactions prepared between the Company and its related parties, in accordance with IAS 24, as well as the most significant events after the end of the financial year. Also included are the Company's Non-Financial Statements under Law 403/07.07.2016 and the classification statement. The Report of the Board of Directors includes the explanatory report in par. 7 of Article 4 of Law No. 3556/2007 as well as the Corporate Governance Statement. The Annual Report of the Board of Directors is posted on the official corporate website [www.eydap.gr](http://www.eydap.gr).

## Let us know your opinion

In order to keep all of our stakeholders informed, we encourage any comments or observations that may help in our efforts for continuous improvement. Contact details are available below:

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Supervisor Corporate Responsibility & Sustainability Service  
Tel: +302107495412 - +302107495420  
[aage@eydap.gr](mailto:aage@eydap.gr) - [pubrel@eydap.gr](mailto:pubrel@eydap.gr)



## **The largest**

water management company  
in Greece and one of the largest  
in Europe



## **With exclusive water distribution rights**

in Attica until 2040







**Serves 40%**  
of the Greek  
population



**High**  
expertise



## **10-year investment program**

2023-2032 includes projects with  
a gross budget of

**EUR 1,717 million**

# MAJOR EVENTS 2022

## Agreement between EYDAP SA and the Greek State

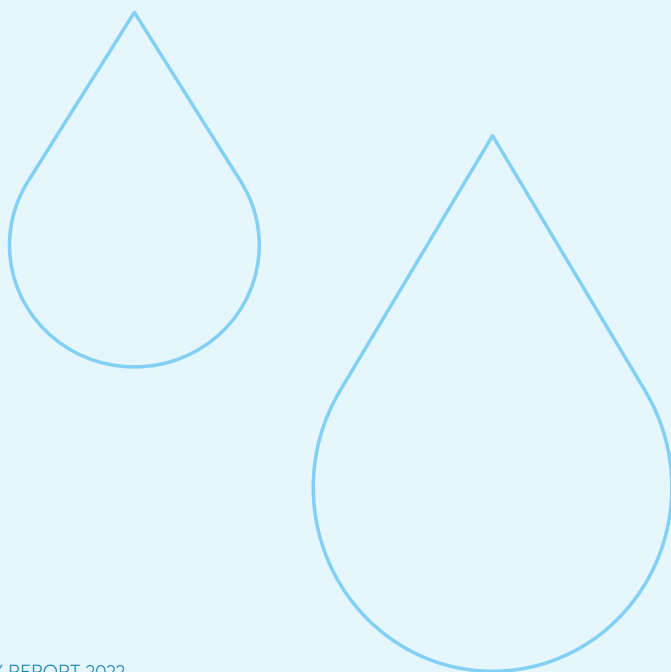
On **February 2nd, 2022**, the two contracts between EYDAP and the Greek State were signed. These contracts define

(a) the terms of renewal of the exclusive right to provide water supply and sewerage services granted to EYDAP SA until 31.12.2040

and

(b) the provision of operation and maintenance services of the external water supply system (EWS) for 3 years.

With the signing of the 2 Contracts, a long-standing pending issue has been finally resolved, which now allows the Company long-term visibility and gives it the opportunity to implement its demanding strategic plan, for the benefit of all parties involved.



## Operation, Maintenance, Repair & Rehabilitation of the External Water Supply System (EWS) Facilities

With regard to the tender process (PPP) for the maintenance and operation of the EWS, which was announced by the Ministry of Transport and Infrastructure in **October 2022**, through the unanimous decision 1886/2022 of the major composition of the D Chamber of the Council of State, the supreme annulment court ruled that the tender process cannot proceed in the given form.

According to the contract for the operation and maintenance of the EWS signed between EYDAP S.A., the Greek State and EYDAP Fixed Assets, there is a possibility of unilateral extension by the Greek State for an additional period of 6 months, i.e. 30 June 2024, and another extension is also possible upon agreement of the parties.

Since due to the aforementioned decision of the State Council of Greece it will be difficult within this timeframe to have the content of the contract assigned by the public sector to a third party, it is expected that the contract with EYDAP will be extended in accordance with Article 11 of the above-mentioned contract.

To address any other relevant development, EYDAP will prepare alternative action plans within 2023.

EYDAP will continue to operate and maintain the External Water Supply System (EWS) until the expiry of its relevant contract or a relevant extension, as it has been successfully doing for the last 40 years, providing uninterrupted water of high quality and affordability in Attica, through its accumulated expertise and experience.



## Decisions of the Council of State

On **February 4th, 2022**, the decisions of the Plenary of the Council of State of Greece (CoS) No. 190-1/2022 were published, in which the transfer of the majority of the share capital of EYDAP SA and EYATH SA to the Hellenic Holding and Property Company by law 4389/2016 was deemed unconstitutional. The Hellenic Corporation of Assets and Participations holds direct voting rights for 50.003% of the share capital of EYDAP and indirect voting rights for 11.33% of the share capital through the Hellenic Investment Fund.

On **July the 30th, 2022**, Law No. 4964 (Articles 114 & 115) was published, which includes the specific arrangements for EYDAP and EYATH, including that the shares of the companies remain in the possession of HCAP with increased public supervision.

On **December 28th, 2022**, the 4th Section of the Council of State, in its decision 2519/2022, unanimously annulled, in its entirety, the decision of the inter-ministerial National Water Commission, No. 135275/19.05.2017, on water pricing rules, as contrary to Directive 2000/60 and the relevant national legislation (Law 3199/2003 and PD 51/2007).

## Signing of a Memorandum of Understanding (MoU) between EYDAP and ELLINICO S.A.

In **July 2022**, EYDAP entered into a Memorandum of Understanding and Cooperation with Lamda Development S.A., through its subsidiary ELLINIKO S.A. ("LAMDA") for the water supply, wastewater and recycled water production facility, as well as an urban and exurban recycled water distribution network to meet the needs of the metropolitan center of Elliniko – Agios Kosmas

*Reference is made in the section "Circular Economy".*



## High priority projects for the EWS

EYDAP and all stakeholders had acknowledged and assessed the risk of unsafe water supply to Attica due to the failure of the external water supply system in the integrated aqueduct, which is owned by the State. In the event of a failure in this area, a temporary shortfall of 30-40 % of Athens' water supply is estimated to be possible.

On **August 4th, 2022**, the Ministry of Infrastructure and Transport sent a letter to EYDAP stating that it is expected that EYDAP will be awarded top priority projects for the EWS, with a budget of €78 million (including VAT) in accordance with the procedures of Law 4412/16 and the terms of the contract of February 2nd, 2022.

However, the Ministry of Infrastructure and Transport had not specified how the projects would be financed, and the signing of a relevant planning contract with EYDAP has not progressed.

In order to avoid the consequences of this risk, EYDAP addressed in **March 2023**, a request to the competent Ministries for the specification of the method of financing and the necessary preconditions for the implementation of the necessary improvement projects. In a letter of the Management in **April 2023** to the supervising Ministry, following a relevant meeting of EYDAP, EYDAP Fixed Assets, Ministry of Transport and Infrastructure, Ministry of Environment and Energy, it was communicated that the fastest and most feasible solution in order to proceed as soon as possible with the implementation of these projects is to draw up a contract between EYDAP S.A. and EYDAP Fixed Assets.

# EVENTS AFTER THE END OF THE 2022 FINANCIAL YEAR

## Signing of the Agreement between the Municipality of Athens and EYDAP

On **February 8th, 2023**, a planning agreement was signed between EYDAP and the Municipality of Athens, according to which EYDAP will proceed with the construction of the secondary final sewage network, either for the replacement of old municipal pipelines or for the completion of the network in the Municipality of Athens, as well as the construction of private connections of properties to the main pipelines.

## Decisions of the Conformity Council of the Council of State

With the decision of the Conformity Council of the Council of State (**March 2023**), the Greek State was found to be non-compliant with the 190/2022 annulment decision of the Supreme Council of State and the Ministry of Finance was ordered to comply within 8 months and transfer the majority of the shares of EYDAP from HCAP to the Greek State.

## Transfer of shares of HCAP to the Greek State

Article 64 of Law 5045/29/7/2023 (Transfer of shares of EYDAP and EYATH from HCAP to the Greek State) provided that all the shares of EYDAP held by HCAP are transferred to the Greek State. After the transfer, the rights of the Greek State as a shareholder in EYDAP are exercised jointly by the Ministers of Finance and Environment and Energy.

The transfer of shares was completed on **3/8/2023**

## New Independent Regulatory Authority

On **March 28th, 2023**, Law 5037/2023 (Government Gazette 78/A/28-3-2023) "Renaming of the Energy Regulatory Authority to Regulatory Authority for Energy, Waste and Water (RAEWW) and expansion of its scope with responsibilities for water services and urban waste management, strengthening of water policy - Modernization of legislation on the use and production of electricity from renewable sources through the incorporation of EU Directives 2018/2001 and 2019/944 - Specific provisions on renewable energies and environmental protection" was published. .

## Tripartite signature of an Addendum to the Agreement of 2.2.2022

In **June 2023**, the tripartite signing of an Addendum to the Contract of 2.2.2022 between the Greek State, and the companies "EYDAP Fixed Assets Company" and "E.YD.A.P. S.A." was successfully concluded. The subject matter of the agreement is the execution of works on the closed Joint Aqueduct of Mornos - Marathon, Section Klidi - Dafnoulia.

## New Regulatory Framework

By Law 5037/2023, the supervision of EYDAP was transferred to the Ministry of Environment and Energy, while the supervision of the provision of water services and urban waste management throughout the country was assigned to the Regulatory Authority for Energy, Waste and Water (RAEWW). *Reference is made on page 44 of the Annual Financial Report posted on the company's website eydap.gr*

## Unilateral Extension of the Contract of 2.2.2022 for the operation and maintenance of the EWS

On **8.8.2023**, pursuant to the decision of the Board of Directors of EYDAP No. 17/8.8.2023, the unilateral extension of the contract for the operation and maintenance of the External Water Supply System (EWS), between the Greek State, EYDAP SA and EYDAP Fixed Assets Company, was approved for an additional period of 6 months, **i.e. until 30 June 2024, with the same terms.**



## Shareholding structure 31.8.2023

Shareholder	% of Shares	Number of Shares	Number of Shareholders
<b>Greek State</b>	50%+1 share	53,250,001	1
<b>HRADF</b>	11.33%	12,069,739	1
<b>Legal entities</b>	30.26%	32,222,470	313
<b>Natural persons</b>	8.41%	8,957,790	21,411
<b>Total</b>	<b>100.00%</b>	<b>106,500,000</b>	<b>21,726</b>

All (100%) of the shares of HRADF are held by HCAP S.A., which now directly controls the voting rights of 12,069,739 shares (11.33%) through HRADF. Therefore, the total percentage of voting rights (direct and indirect) of HCAP S.A. amounts to 11.33%. The Greek State controls 100% of HCAP S.A.

The total percentage of voting rights controlled directly and indirectly by the Greek State amounts to 61.33%.



## 41st Annual General Meeting of Shareholders on September 6th, 2023

The 41st Ordinary General Meeting of the Company's Shareholders was held on September 6th, 2023. The discussion and decision on items 4 and 5 of the Agenda of this meeting was postponed following a request submitted by the Greek State as the Majority Shareholder. The General Meeting approved the remaining items on the agenda.

On September 12th, 2023, the 41st Ordinary General Meeting of the Company's Shareholders was held to discuss and decide on the items 4 and 5 of the agenda mentioned in the invitation of 2.8.2023.

**On the 4th item:** The Greek State as the majority shareholder, proposed and elected the following 9 Members of the Board of Directors of EYDAP SA for a four-year term of office, expiring on 6.9.2027. Their term of office is extended automatically until the Annual General Meeting of Shareholders to be held after the expiry of their term of office.

**On the 5th item:** The General Assembly, upon the proposal of the Greek State as the Majority Shareholder, appointed four (4) Independent Members of the Board of Directors of E.YD.A.P. S.A. as follows:

On 14 September 2023 the Board of Directors met and was constituted as follows:

	<b>Termination of office</b>
<b>George Stergiou</b> , Chairman of the Board, Non-Executive Member	6 September 2027
<b>Harry Sachinis</b> , CEO, Executive Member	6 September 2027
<b>Antonis Giannikouris</b> , Non-Executive Member	6 September 2027
<b>Christos Karaplis</b> , Non-Executive Member	6 September 2027
<b>Helen - Maria Kaymenaki</b> , Non-Executive Member	6 September 2027
<b>Marika Labrou</b> , Independent Non-Executive member	6 September 2027
<b>Anastasia Martseki</b> , Independent Non-Executive member	6 September 2027
<b>Marina Mavrommati</b> , Independent Non-Executive member	6 September 2027
<b>Efthymios Sfikas</b> , Independent Non-Executive member	6 September 2027
<b>Christos Mistriotis</b> , Non-Executive Member	9 June 2027
<b>Panagiotis Skoularikis</b> , Non-Executive Member	9 June 2027
<b>Emmanouel Aggelakis</b> , Non-Executive Member	24 June 2026
<b>Georgios Alexandrakis</b> , Non-Executive Member	24 June 2026

The term of office of the 2 Minority Shareholders' Representatives is 4 years, expiring on 9 June 2027, with the possibility of extension for up to 1 year. The term of office of the 2 Representatives of the employees of EYDAP SA shall be 4 years, expiring on 24 June 2026, with the possibility of extension for up to 1 year.

## Planning Contract between EYDAP and Municipal Water Supply & Sewerage Company of Volos

The purpose of the planning contract of **18.9.2023** is for EYDAP to award and execute study contracts for the reinforcement of the Volos aqueduct, which suffered total destruction from the Daniel rainstorm, in order to restore water supply to the area.

The total budget of the studies amounts to 295,000 euros plus VAT, while EYDAP will provide free of charge the supervision and management services for the preparation of the studies in the context of the Company's corporate responsibility.

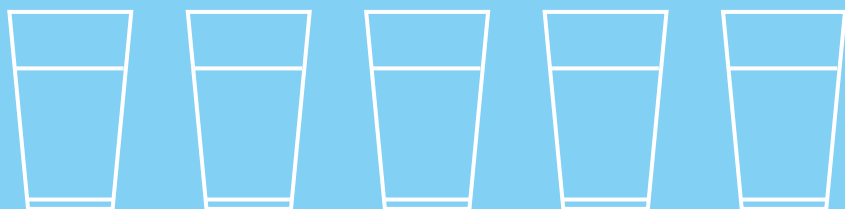
## Megara WWTP

September 2023, EYDAP will take ownership of the Megara WWTP as well as and the municipal sewerage network of Megara city and the encompassing area of Nea Peramos, with a total length of 96 km, which includes approximately 6,600 constructed external branches of properties.

# EYDAP supplies Attica with one of the highest quality water in Europe



**Excellent**  
drinking water quality



**99,7 %**  
for EYDAP water  
quality

Annual International  
Water Company  
Assessment  
European Benchmarking  
Cooperation 2022

The main water sources and the reservoirs used are located in pristine areas, free of agricultural and industrial activity. Most of the untreated water is transported through aqueducts by gravity, actively contributing to the reduction of the environmental footprint.

## Water Supply Services

**4,400,000 customers**

**Operates and manages  
4 reservoirs  
495 km External  
Water Supply Network (EWS)**

**4 WTPs**

**14,300 km**  
Distribution Network

**2,247,915**  
water connections

**1,052,393.76 m<sup>3</sup>/day**  
drinking water distribution by  
average

**384,123,724 m<sup>3</sup>**  
annual drinking water  
distribution



## Sewerage Services

**3,695,000 customers**

**8,598 km**  
Wastewater Collection Network

**3 WWTPS**

**Large Sewerage Projects  
in Eastern Attica**  
for holistic management  
of the region's wastewater

**700,330 m<sup>3</sup>/day**  
wastewater treatment

**256,100,000 m<sup>3</sup>/annually**  
wastewater treatment

**95% free of its pollutant  
load return to the  
environment**



## Our People

**2,422 employees**

**33.34%**  
of employees are graduates of  
Technological & Higher Educational  
Institutions (Universities)

**Collective Agreement of Employees**

**31.11%**  
of employees are women

**56.60%**  
of employees holding a position  
of responsibility are women

**56.64%**  
of managerial positions are  
held by women

**Continuous training of  
human resources**



## Supply chain

Incorporating  
sustainability principles

Full compliance with the  
National Legal Framework  
for Public Procurement

Procurement, storage,  
stocking, ensuring  
sufficiency, handling &  
disposal of materials

Supply chain optimisation  
projects

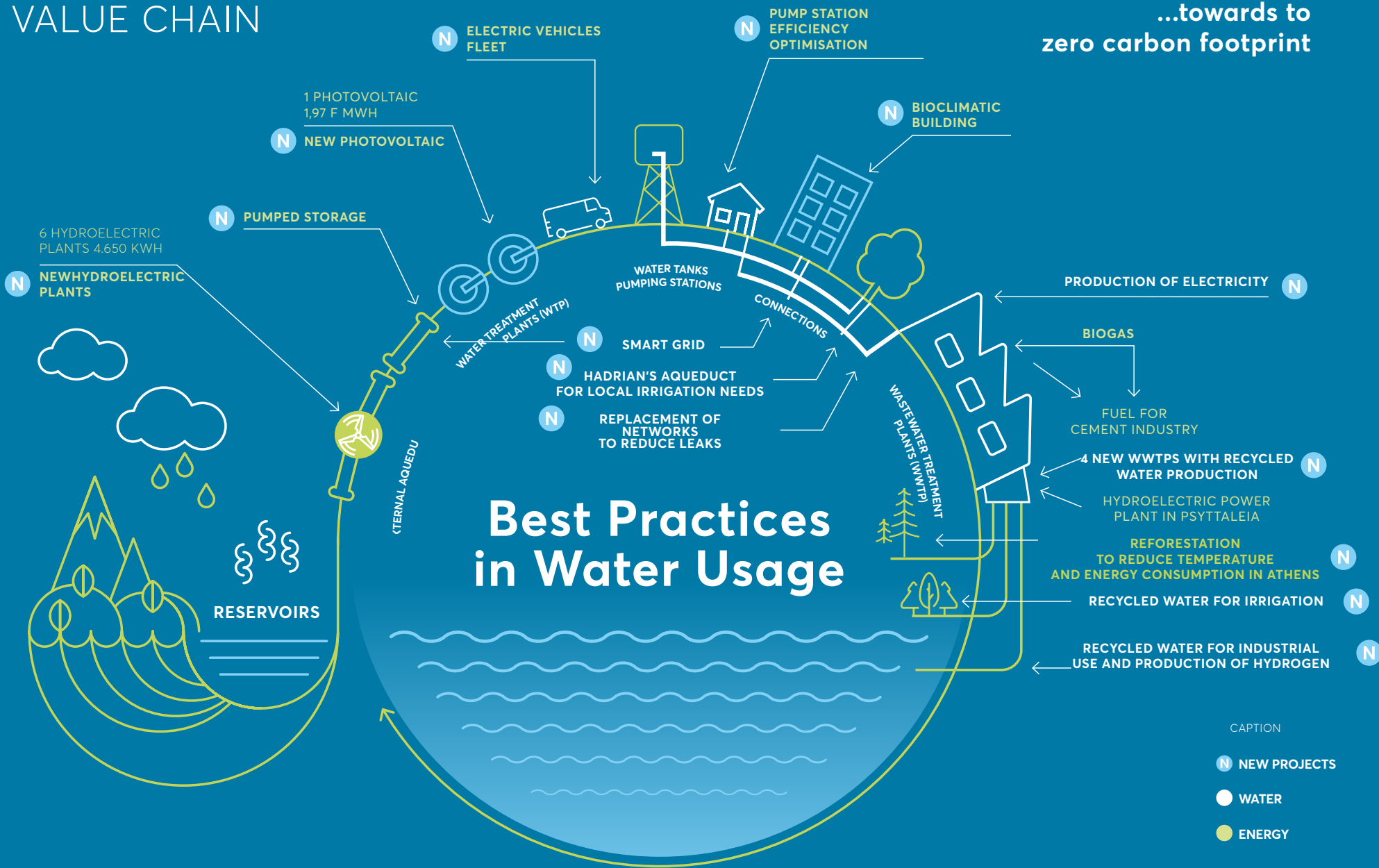
Long-term agreements  
compatible with the  
principles of free  
competition





VALUE CHAIN

...towards to  
zero carbon footprint



## Our vision

is to remain the largest and most reliable Company in the management of the water cycle, always oriented towards People, Society and the Environment.

## Our mission

Is to provide high quality and affordable drinking water to an increasing number of people, and to return water free of its pollution load back to the environment through the efficient management of all available sources, with social sensitivity and in terms of our contribution to Social Welfare.

## Our goal

is to transform the Company into a more effective organization, to make efficient use of water resources, to ensure the sustainability of its investments, to enhance its market value, to achieve a reasonable return on invested capital, to attract new investors, to ensure a fair and dynamic working environment, to create new jobs and to provide added value to society by improving the level of services offered and developing new water supply and wastewater networks.

## ESG at the heart of our strategy

## Our strategy

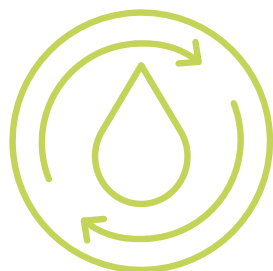
is based on achieving balanced and sustainable development for the benefit of society as a whole, customers, employees, shareholders, the environment and all stakeholders.





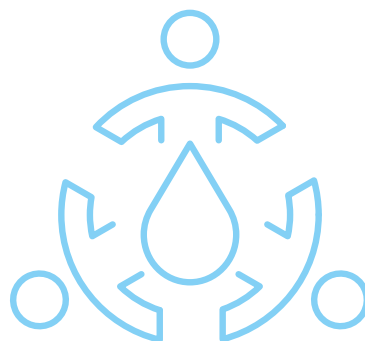
E

ENVIRONMENT



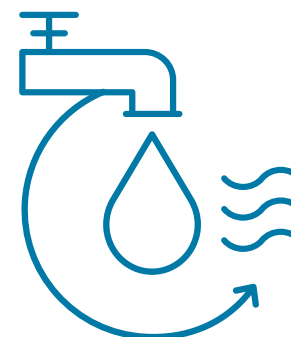
S

SOCIAL



G

GOVERNANCE



AAA

The three pillars of our strategy are:

**S**afety

**E**fficiency

**G**rowth

# E

## ENVIRONMENT



**Sustainable management of the water resource**

**95% clean discharge after wastewater treatment**

**Biodiversity protection**

**New WWTP in East Attica**

**Reduction of energy & carbon footprint**

**41.84 % energy consumption from RES**

**Use of recycled water**

**Adherence to circular economy principles**

**Smart Grid**

**Smart Meters**

**Environmental awareness initiatives**

**R&D**



# S

## SOCIAL

**Drinking water of high quality**

**Reliable wastewater collection and treatment**

**Affordable pricing for all**

**Digital Services**

**Support for economically vulnerable groups**

**Social assistance initiatives**

**Employee Health & Safety**

**Targeted actions in the context of inclusion**

**Synergies with pioneering Greek Educational &**

**Research Institutions**

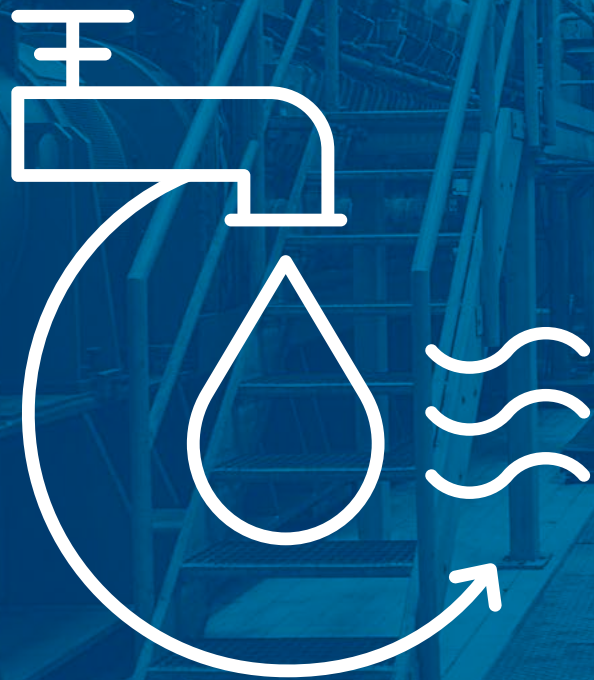
**Promotion of Cultural Heritage**

**EYDAP AE Sponsorship Program**

**EYDAP AE Historical Archive**

**EYDAP AE Scholarships**

# G GOVERNANCE



**Respect for the Principles of Corporate Governance**

**Transparency of Processes**

**Digitisation-automation of processes**

**Equality & Protection of Rights**





## GLOBAL COMPACT

**EYDAP declares its commitment to upholding the ten principles of the Global Compact by publishing its performance on an annual basis.**

*On page 276 is the Table of Contents of ten principles of the Global Compact with the relevant references in the Report.*



## Our ESG performance

EYDAP's participation in international assessments reflects the alignment of its strategy with ESG goals through transparent processes and a commitment to climate change actions.

### Main ESG Raters

Raters	Performance scale (Lower - Upper)	2021	2022	Comparison with the previous year	
<b>S&amp;P Global</b> *	0 - 100	19/100	36/100	+17 points	↑
<b>CDP</b>	D - A	-	C	1st year of evaluation	
<b>MORNINGSTAR SUSTAINALYTICS</b>	100 - >=10	42.8	37.5	+5.3 points	↑
<b>REFINITIV</b>	D - A+	Not available	B+	1st year of evaluation	

\* The Company's rating is higher than 68% of the 92 companies in the industry rated globally..

## Investment Program

The 10-year investment program 2023-2032 includes projects with a gross budget of €1,717 million, where for all the projects, **€722 million (42%)** is expected to be financed by the European Union.

In 2022, the absorption of the investment program amounted to **to €30.5 million, an increase of 66%** compared to the absorption of €18.3 million in 2021.

*Reference is made to the "Financial Performance" section of the same Report..*







## Corporate Awards

### Superbrands Greece Awards 2021-2022

**EYDAP's brand was awarded as a super brand** in the international award "Superbrands Greece 2021-2022", in the category Energy - Recycling

### EBEN GR

**Gold Award** from the non-profit organization EBEN GR (Greek Institute of Business Ethics Network) to the Internal Audit Department of EYDAP.

### Hellenic Responsible Business

**Bronze award** for EYDAP's Corporate Responsibility Report

### Business Law Awards 2022

**Gold Award** at the in the category "In-House Public Sector & Procurement Team" for the Legal Services Directorate.

### Legal 500 GC Powerlist for Greece and Cyprus 2022

**Award** for EYDAP's Legal Services Directorate.



### Awards for the employees of the General Directorate of Customer Services

The award ceremony was held in the context of the Real Life Heroes Awards 2022, an institution organized by the Hellenic Institute of Customer Service, of which EYDAP is a member.

### EYDAP's distinction in the CR Index 2022-2023

EYDAP was awarded with **the SILVER distinction in the CR Index** of the Corporate Responsibility Institute and at the same time received the **"Best in Progress" Special Award** for the steps it has taken in the areas of Sustainable Development and ESG.

### Environmental Awards 2022

**EYDAP was awarded** the Silver in the Environmental CSR category, organized for the eighth consecutive year by Boussias, for the Water Week 2022, for its citizen awareness campaign around water and held on the occasion of World Water Day in March 2022.

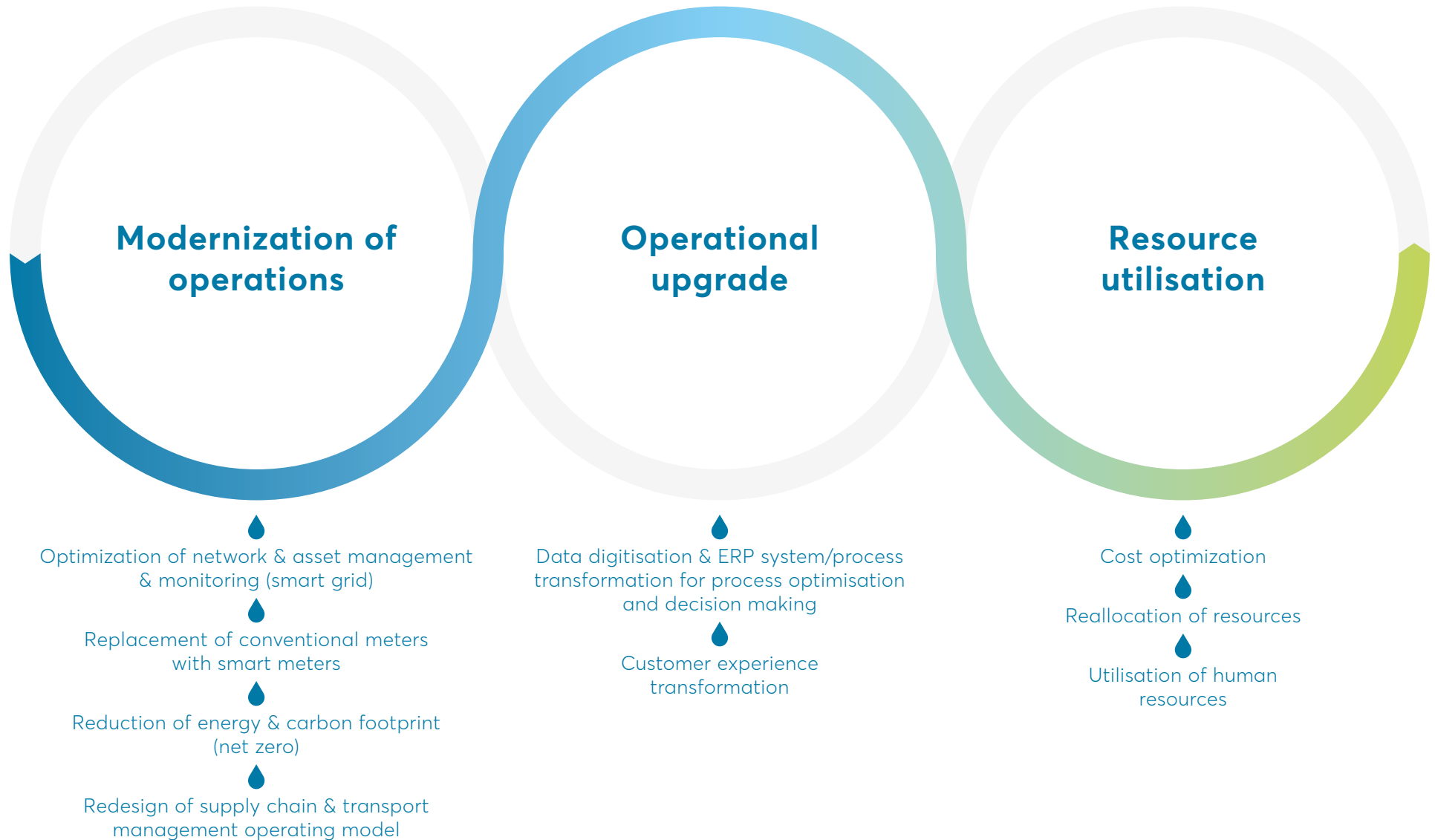


## PRIZE AWARDS for the ADRIANIO AQUEDUCT

In September 2022, EYDAP was awarded the «Environmental Heritage Award» for the Hadrianic Aqueduct, as an important and time-resistant hydraulic project, during the closing ceremony of the 7th IAHR European Conference. The conference titled «Innovative Water Management in a Changing Climate» was held in Athens, under the auspices of the Ministry of Infrastructure & Transport, the Ministry of Environment and Energy, the Ministry of Climate Crisis and Civil Protection, the Region of Attica, the Municipality of Athens and the National Technical University of Athens.

In September 2022, EYDAP was awarded the Gold Award at the Environmental Awards 2022 in the Cultural Heritage category for its work at the Adriano Aqueduct, through the European Cultural HIDRANT program, at a ceremony organized for the 8th consecutive year by Boussias.

# The Company's Transformation Strategy



# EYDAP BUSINESS MODEL

## Material Collaborations

- Specialized Work Force
- ΔPublic Entities
- Educational Institutions
- Research Institutions
- Local Authorities

## Main Activities

- Water Treatment & Supply
- YSewerage Services
- Effluents Treatment Services
- Construction & Operation of water supply/ effluent collection networks
- Education, Training & Lifelong Learning Services
- R & D Services
- Energy Production

## Main Sources

- Pipelines network
- Water Treatment plants
- WasteWater Treatment Plants
- Hydroelectric Power Stations
- Photovoltaic Station
- Chemical & Microbiological Laboratories

## Cost Structure

- Staff remuneration
- Pipeline network maintenance
- Construction of facilities
- Raw water cost
- Material consumption

## Value Generation & Utility

EYDAP aims at the health, well-being and in general the best possible life quality for the capital's residents offering the most important good. Cares for the uninterrupted supply of drinking water and sewerage services so that people's life and businesses' and organizations' operation is carried out under optimal conditions

## Competitive Advantage

- High quality drinking water
- Smart Grid with the use of information and communication technology for the accurate reading of water meters
- 24hour telephone service (1022)
- Extensive pipeline network for the coverage of 4,400,00 inhabitants (water supply)
- 24hour network monitoring with a remote control system (SCADA)
- Certified chemical and microbiological laboratories with ISO 17025

## Customers

- Industries
- Individuals
- Businesses
- Public Entities
- Local Authorities

## Customer Relations

- High level of Service
- Customer oriented philosophy
- Creation of special Directorate for the Management & Customer Experience
- Customer Satisfaction Survey
- Customer Complaints Management

## Communication Channels

- Corporate events/ seminars
- Telephone Communication
- Corporate website
- Social Media
- Click2Call
- Application "EydApp"
- Electronic Petition at eEYΔΑΠ
- 13 Customer Service Centers

## Revenue Structure

- Water connections & relevant services
- Sewer and relevant services
- Electric Power Sale
- Divestment



# 1.

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# 1.1 Profile of EYDAP SA Group

## EYDAP SA

The "Water Supply and Sewerage Company of the Capital SA" with the distinctive title EYDAP SA (or "EYDAP", or the "Company") is the largest Company in Greece active in water distribution and management as well as in the provision of sewerage and wastewater treatment services.

The 'Water Supply and Sewerage Company of the Capital' was founded in 1980 by Law 1068 'on the establishment of a single entity for water supply and sewerage in the capital' after the merger of the Hellenic Water Company of the Cities of Athens - Piraeus and its environs and the 'Sewerage Organization of the Capital, as exclusive provider of water supply and sewage services in the cities of Athens-Piraeus and the surrounding areas of these municipalities and communities with the legal form of an anonymous (Société Anonyme -S.A.) company under the full control of the Greek State.

The headquarters of the Company are located at 156 Oropou Street, Galatsi, Attica.

In 1999 with Law 2744 "Regulation of issues of the Capital Water Supply and Sewerage Company and other provisions", the legal status of EYDAP was re-regulated and the company took its present legal form with the listing of all its shares on the Athens Stock Exchange and under the supervision of the Minister of Infrastructure and Transport.

- Article 2 of Law 2744/1999 granted to EYDAP **the exclusive and non-transferable right to provide water supply and sewerage services** in the capital area for a period of twenty (20) years with the possibility of renewal according to the terms of the contract that EYDAP would conclude with the Greek State. This contract specified, inter alia, the price, quantity, quality and method of supply of the untreated water that the Greek State would provide to EYDAP, so that the latter would be able to meet its water supply service obligations (Article 6(1) of Law 2744/1999).
- Article 4 of Law 2744/1999 established a public limited company called **"EYDAP Fixed Assets Company"**, to which the ownership of real estate assets of strategic importance of EYDAP was transferred free of charge. EYDAP Fixed Assets Company is responsible for the proper operation and maintenance of the transferred assets.





**Law 4812/2021** (Article 114) renewed until **31.12.2040 the exclusive right to provide water supply and sewerage services** granted to EYDAP by Law 2744/1999 (paragraph 1, Article 2).

- By par. 2 of the same article provided for the **conclusion of a contract between the Greek State, on the one hand, and EYDAP, on the other hand, and as a third party the legal person governed by public law "EYDAP Fixed Assets Company"** regarding the terms and conditions of exercising the right granted.
- By par. 3 provided that the **price paid for the supply of untreated water** shall be paid by EYDAP to the EYDAP Fixed Assets Company, in accordance with par. 1 of Article 6 of Law 2744/1999 and further allocated by the State to finance the operation, maintenance and upgrading of the External Water Supply System (E.W.S.) of the greater Capital Region.
- By par. 4 provided for the conclusion of a **contract between the Greek State, the EYDAP Fixed Assets Company and EYDAP**, whereby the latter is entrusted with the maintenance and operation of the water supply system of the major capital area for a period of three (3) years, which may be extended by agreement of the contracting parties. After the expiry of the said contract, the Ministry of Infrastructure and Transport shall entrust the maintenance and operation of the water supply system of the major area of the capital city to a contractor appointed through a tender procedure in accordance with Law 3389/2005 (A' 232).

Pursuant to the above provisions **2.2.2022 signed between the Greek State, the EYDAP Asset Company and EYDAP:**

- the **Contract of exclusive right** whereby, inter alia, the State grants to EYDAP for consideration the intangible right of exclusive supply of untreated water and agrees to supply untreated water on an annual basis and for twenty (20) years, as specifically set out in Article 10 of this Contract,
- the **EWS Operation and Maintenance Services Agreement** with an initial term of three years and an option to extend for six (6) months.

By **Law 5037/29.3.2023** (Government Gazette A' 78), the **supervision** of

- **supervision of EYDAP was transferred to the Ministry of Environment and Energy**
- the provision of water and urban waste management services was transferred to the **Waste, Energy and Water Regulatory Authority.**

## Transfer of HCAP ownership shares to the Greek State

Article 64 of Law 5045/29/7/2023 (Transfer of shares of EYDAP and EYATH from HCAP to the Greek State) provided that all shares of ownership in EYDAP held by HCAP shall be transferred to the Greek State. After the transfer, the rights of the Greek State as a shareholder in EYDAP are exercised jointly by the Ministers of Finance, and Environment and Energy.

The transfer of shares was completed on 3/8/2023.



Εγκαταστάσεις Ακροκέραμος

## EYDAP Nison Development S.A.

In July 2011, EYDAP NISON S.A. was established, in which EYDAP SA holds 100% of the share capital. In the Extraordinary General Meeting of 21/9/17 it was decided to change the name to EYDAP Nison Development S.A.

**The purpose of the Company is the provision of water supply, sewerage and a number of activities related to the above, in the Greek territory outside the competence of EYDAP SA.**

The Board of Directors appointed by the General Assembly of 24 May 2022 with a term of office until 25/5/2027, consists of the following members:

**Charalambos Sachinis**, Chairman of the Board and CEO

**Anastasios Tosios**, Member

**Georgios Karagiannis**, Member

**Konstantinos Vougiouklakis**, Member

**Petros Matsoukis**, Member

In 2022 EYDAP Nison Development Company signed:

- Contract with the Municipality of **Herotiki Kasos Island** for the provision of technical support for water supply projects and services of the Municipality for an additional year. Work was also completed to repair the leakage in the operating pipeline network of the Astypalaia dam.
- Memoranda of Understanding for a long-term and beneficial cooperation and exchange of information and knowledge with the Ministry of Agriculture, Rural Development and Environment of Cyprus, the Nicosia Water Distribution Authority and the Wastewater Treatment Authorities of Larnaca and Limassol

Agreed,

- with the **Ministry of Aegean and Island Policy** to draw up a Memorandum of Understanding in order to strengthen the cooperation of EYDAP through its subsidiary on water supply and sanitation issues on the **islands of the Territory**.

## 1.2 Company Law

From a corporate law perspective, EYDAP is currently governed by the provisions of the Law on Public Limited Companies 4548/2018, the Law on Corporate Governance 4706/2020 as well as by all the stock exchange legislation (Regulation (EU) 596/2014, Law 4443/2016, Law 3556/2007 etc.) and decisions and instructions of the Securities and Exchange Commission, by which it is supervised.



## 1.3 EYDAP's Corporate Purposes and Activities



Provision of water supply & sewerage services, as well as the design, construction, installation, operation, handling, management, maintenance, extension & renewal of water supply & sewerage systems.

Projects & procedures for the collection, transport, storage, treatment, as well as management and disposal of the products of the treatment of waste water.

The study and exploitation of natural sources and water resources, the production and bottling of water and all kinds of soft drinks and beverages containing water.

The provision of water meter maintenance services, camera inspection of sewerage networks, undertaking water quality tests of third-party networks in EYDAP's laboratories, undertaking on-line measurement and recording of water quality parameters of water bodies with corresponding provision of services, the parallel reception of meter readings of other utilities.

The strengthening of research and technology services with the simultaneous establishment of a cross-sectoral, research center for the development of innovative solutions for the activities of EYDAP.

Pumping, desalination, treatment, storage, transport, distribution and management of all types of water in order to achieve the above mentioned objectives of the Company.

Provision of telecommunication, energy and related and other services and their use, where appropriate, provided that the safe and reliable operation of the water supply and sewerage system is not affected, in parallel for other purposes, such as the development of telecommunication and energy activities.

The exploitation of know-how and the provision of technical assistance services. The making of investments related to the aims and scope of the Company.

The provision of education, training and lifelong learning services. The establishment and operation of technical training schools.

Detailed corporate objectives are listed on the corporate website [eydap.gr](http://eydap.gr)

In order to achieve its purposes, the Company may form companies or joint ventures or participate in companies or joint ventures within or outside Greece, provide technical or consulting services to natural or legal persons, etc.



## 1.4 EYDAP SA area of competence

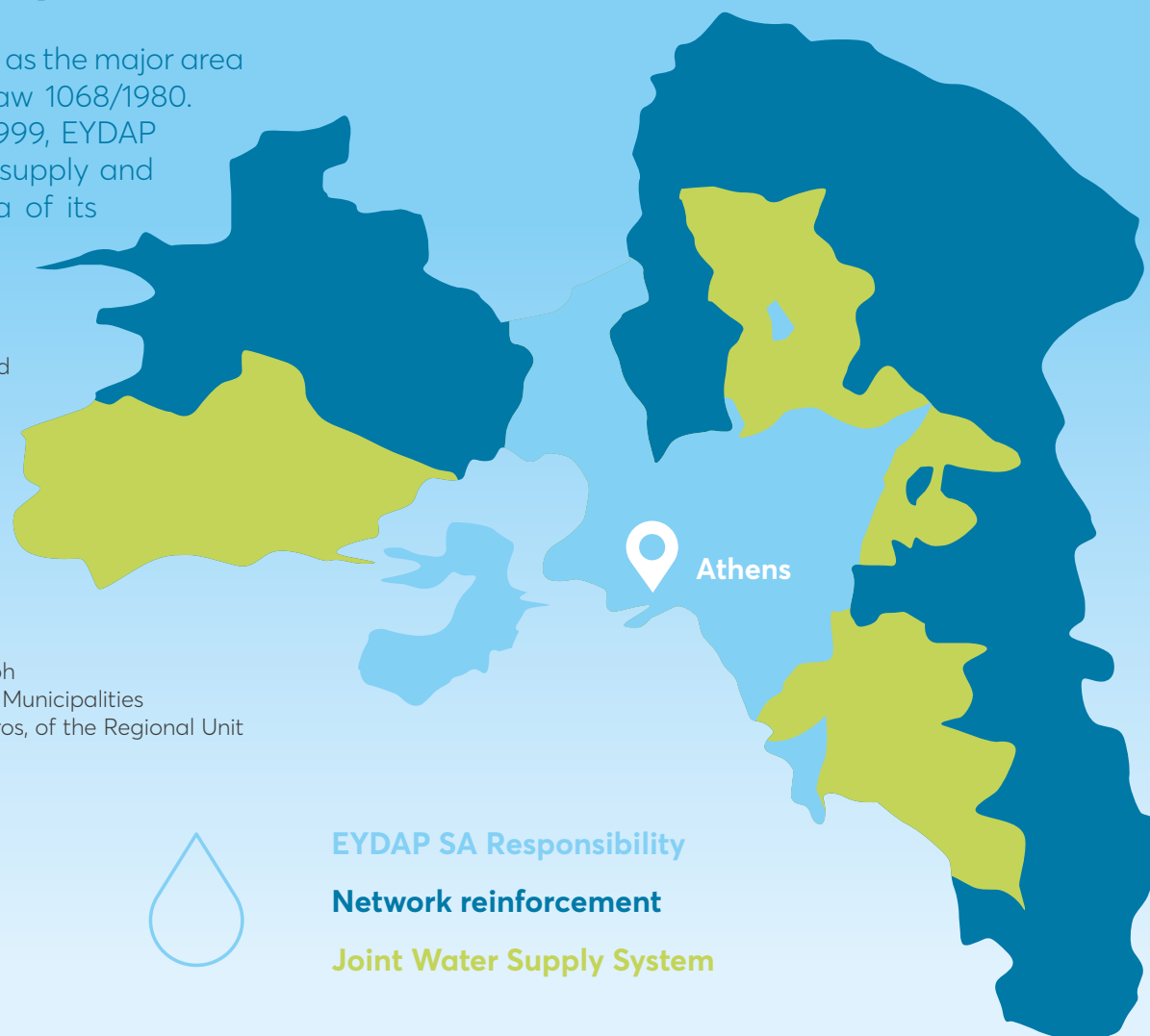
EYDAP SA's area of competence was defined as the major area of the Capital, as defined in its founding Law 1068/1980. At the same time, according to Law 2744/1999, EYDAP SA has the exclusive right to provide water supply and sewerage services in the geographical area of its competence. This right is inalienable and non-transferable.

The duration of this right, which is valid for 20 years, as well as its renewal, is regulated by the new Contract concluded between the Greek State, EYDAP Fixed Assets and EYDAP SA.

**This Contract was signed in February 2022 and is valid until 31.12.2040.**

By article 68 of Law 4313/17-12-2014, article 8 of Law 4313/17-12-2014 was amended. 2744/1999 and the area of operation of EYDAP SA was extended to all the municipalities of the Region of Attica, as defined in subparagraph i of paragraph 3 of article 3 of Law no. 3852/2010 except for the Municipalities of Aegina, Troizinia, Kythira, Agistri, Spetses, Hydra and Poros, of the Regional Unit of the Islands of the Region of Attica.

Map of Competence



**EYDAP SA Responsibility**

**Network reinforcement**

**Joint Water Supply System**

**EYDAP SA's area of competence covers the administrative boundaries of the following Municipalities and Municipal Units, which are supplied with water either directly or with special supplies.**

## Municipalities and Municipal Units within EYDAP SA's Area of Competence

On the corporate website [eydap.gr](http://eydap.gr) there is a detailed reference to the Municipalities and Municipal Units within EYDAP's area of competence that are supplied with water

- **directly from EYDAP SA**
- **through network reinforcement** i.e. areas supplied by EYDAP SA through a municipality without responsibility and participation in the operation of the local internal network
- **by a mixed system**, i.e. areas where some parts are covered by EYDAP SA and other parts are covered either by a private network or under the responsibility of the local municipality

## Municipalities and Municipal Units Outside EYDAP SA Area of Competence

### Water supply with or without participation of EYDAP SA in the operation of the local network

Along the Mornos and Yliki aqueducts there are municipalities and municipal units, located in areas outside EYDAP SA's competence, which are supplied either by EYDAP SA with treated water through installed small water treatment plants, or by the EYDAP Fixed Assets EYDAP N.P.D.D. with undiluted water.

In both cases, the water supply is provided through special supplies granted to each Local Government Organisation (LGO), without the participation of EYDAP SA in the operation of the local network.

EYDAP SA also supplies refined water (transported by ships) through special supplies to the islands of the South Aegean Region and the Regional Unit of Islands of the Region of Attica. Finally, EYDAP SA supplies untreated water, through special supplies, to a number of important private production units operating in areas along the major water supply pipelines.

### EYDAP SA supplies refined water through small water treatment plants (rapid refineries) and special supplies to municipalities and communities along the Mornos Aqueduct.

- The rapid refinery located near Distomo supplies water to Distomo and Steri, which belong to the Municipality of Distomo - Arachova - Antikyra.
- The express refineries located near Kyriaki and the settlements of Tarsos - Karyotis and Panagia Kalamiotissa supply water to Kyriaki and the settlements of Tarsos, Karyotis and Panagia Kalamiotissa (Zaltsa), which belong to the Municipality of Levadia.
- The rapid refineries located near the Regional Control Centre of Thiva and the Municipal Communities of Kaparelli, Leuctra, Ellopieia, Domvraia and Prodromos, supply water to Plataies, Kaparelli, Melissochori, Ag. Vasileios, Loutoufi, Leuctra, Ellopieia, Xeronomi, Domvraia, Thisvi, Prodromos and Saranti Beach, which belong to the Municipality of Thiva.

### Supply of untreated water by EYDAP Fixed Assets Company through special supplies with the technical and operational support of EYDAP SA, and its subsequent treatment through local water treatment plants operated by the competent local municipalities

- The Municipality of Delphi supplies water to the Municipal Districts of Amfissa and Desfina
- The Municipality of Thiva supplies water to the Municipal Departments of Thiva and Thisvi.
- The Municipality of Tanagra supplies water to the Municipal Departments of Tanagra, Oinofita, Schimatari and Ag. Thomas.
- The Municipality of Chalkida supplies water to Avlida.





### Water distribution by EYDAP SA with treated water, through special supplies, islands of the Regional Unit of Islands of the Region of Attica and the Region of South Aegean

In the **municipalities of Aegina and Agistri**, EYDAP SA provides treated water through special supplies, without its involvement in the operation of the local water supply networks.

Furthermore, EYDAP SA provides treated water, which is transported by ships, through special supplies installed in the port of Lavrio, **to the islands of the South Aegean Region (Cyclades etc.)**.

### Public Authorities and Industries Outside the Competence of EYDAP SA.

Provision of untreated water by EYDAP Fixed Assets through special supplies with the technical and operational support of EYDAP SA, to Public Entities and Individuals.



## Expansion of Activities

Law no. 2744/99 and the recent amendment of article 8 of the same law provides the possibility to expand the activities of EYDAP SA to other areas outside the areas defined in paragraph 1 of the amended article 8 of the law. 2744/1999.

A prerequisite for any attempted expansion of activities is that EYDAP SA must examine and ensure, on the one hand, the reasonable return on investment and, on the other hand, the possibility of financing the Company with own or private funds for the proper fulfilment of its obligations. The adoption of Law no. 4053/2012, under which EYDAP SA may provide the full range of services

defined in Law 2744/1999 outside the area of the Company's jurisdiction, through subsidiaries and through the conclusion of planning contracts with local authorities, forms a new development framework for the Company, expanding the market in which it can operate and develop.

In order to secure the water supply of the greater area of the Capital, as mentioned above, EYDAP SA procures untreated water from the State, which has agreed to secure it from appropriate sources and to deliver it to EYDAP SA.



## 1.5 Pricing Policy

The pricing policy of EYDAP is exercised through the application of the general rules of costing and pricing of water services to be determined by a ministerial decision in accordance with the provisions of Article 12 of Law 3199/2003, as amended by Law 3199/2003. 5037/2023, while the tariffs for water services for the various categories of consumers and users are approved by a five-year decision of the Waste, Regulatory Authority for Energy, Waste and Water (RAEWW) in accordance with Article 12A of Law 4001/2011, as introduced by Law 5037/2023, repealing the relevant provisions of paras. 1 and 2 of Article 3 of Law 2744/1999.

According to par. 5 of article 114 of Law 4812/2021 "the validity of the tariffs of EYDAP SA for the provision of water services offered to its consumers, which have been approved by the joint decision of the Ministers of Finance, Transport and Networks and Environment, Energy and Climate Change (B` 3188) under D6/2027/16.12.2013, is extended for the period from 1.1.2019 and until the approval of the new tariffs under the new contract in accordance with par. 2."



## 1.6 Sustainable Development Strategy

### Sustainable Development Policy

EYDAP adopts and implements a Sustainable Development Policy, approved by its Board of Directors. The Policy is fully aligned with its business strategy, vision and values and is the effective implementation of its Strategic Priorities.

The pillars and commitments it has set integrate sustainability into its business operations and development, creating Value for the Environment, Society and Corporate Governance. The Policy refers to equal access to excellent quality drinking water at an affordable price, support to the local community through actions to contribute to local development in projects with social and environmental implications. The Policy is available on the corporate website [eydap.gr](http://eydap.gr).

### Sustainable Development Supervision

The Company's Board of Directors ensures the oversight and management of Sustainable Development issues as part of the Company's strategic planning. During its meetings, the Board discusses objectives related to sustainable development issues.

Within the framework of the Sustainability Policy, the Board identifies in the Annual Management Report the non-financial issues that are deemed essential for the implementation of its strategy, taking into account the requirements of its stakeholders. The Report includes a reference to the way in which they are managed and the evaluation of these actions on the basis of recognized international standards.

The Board of Directors shall be assisted by the Strategy, Innovation and Sustainable Development Committee in all the above responsibilities.

## Strategy & Innovation Committee of the Board of Directors

- Formulates the Company's Strategy, setting the Company's strategic priorities and objectives in the context of Sustainable Development
- It is informed, analyses, evaluates and advises the Company's Management and the Board of Directors on issues related to the Company's overall strategy and specifically on issues related to new technology and innovation strategy, digital transformation, cybersecurity and sustainability through innovative technologies.

On 23.3.2023, the Board of Directors decided to establish the Strategy, Innovation & Sustainability Committee

## Corporate Governance

EYDAP is committed to operate under the principles of corporate governance in the whole range of its activities.

- The Company's unceasingly complies with national and European legislative and regulatory provisions, which regulate its organization and operation, as well as its activities.
- establishes a framework for self-regulation of the Company's operation by establishing rules that are complementary to the existing regulatory framework and are designed to enhance the sound and responsible management and operation of the Company.
- ensures the transparency, integrity, functionality and effectiveness of the existing system of corporate governance and internal monitoring of the Company.
- enhances the trust towards the Company, its employees, partners and customers.

## eGovernment

EYDAP, through the use of digital technologies and by setting Digital Transformation as its strategic objective, aims to enhance its flexibility and efficiency as a source of value creation, always for the benefit of all its stakeholders, but also for its Sustainable Development.

*Reference is made to the "Digital Transformation" section of the same Report.* ➔





## ISO Certifications

Acknowledging the principles of Corporate Governance, the Company has a system of structured procedures certified with ISO

<b>WATER QUALITY CONTROL DEPARTMENT</b>	<b>ESYD, ELOT EN ISO/IEC 17025/2017, No. 192-7, Valid until: 10-01-2025</b>
<b>INDUSTRIAL WASTE &amp; EFFLUENT QUALITY CONTROL DEPARTMENT</b>	<b>ESYD, ELOT EN ISO/IEC 17025/2017, No. 862-3, Valid until:: 03-03-2025</b>
<b>SEWER LABORATORY ANALYSIS DEPARTMENT</b>	<b>ESYD, ELOT EN ISO/IEC 17025, No. 856-4, Valid until: 11-06-2024,</b>
<b>CUSTOMER SERVICE DIRECTORATE</b>	<b>ISO 9001 Certification Body: TUV Hellas Valid until: 25/05/2025</b>
<b>SPECIAL CUSTOMER SERVICE DIRECTORATE</b>	<b>ISO 9001 Certification Body: TUV Hellas Valid until:: : 25/05/2025</b>
<b>MANAGEMENT &amp; CUSTOMER EXPERIENCE DIRECTORATE</b>	<b>ISO 9001 Certification Body: TUV Hellas Valid until:: : 25/05/2025</b>
<b>HUMAN RESOURCES TRAINING DIRECTORATE</b>	<b>ISO 9001 Certification Body: TUV AUSTRIA Valid until:: : 27/02/2023</b>
<b>INTERNAL AUDIT DIRECTORATE</b>	<b>9001:2015 Certification Body: TUV NORD HELLAS, Valid until: 26/11/2025</b>
<b>INTERNAL PROTECTION &amp; PREVENTION DEPARTMENT (ESSYP)</b>	<b>9001 &amp; 45001 Certification Body: BQC, 10/12/2023 - in the stage of accreditation renewal</b>



## Policies & Regulations

The company adopts Policies and Regulations that it updates from time to time. The Policies and Regulations adopted by the Company are posted on the Company's website [eydap.gr](http://eydap.gr).

The Policies & Regulations adopted and implemented in 2022 are mentioned in the "Corporate Governance" section of the same Report. ➔



Microbiological Laboratory

## Risk Management

EYDAP manages its operational risks through a process of identifying, evaluating, managing and controlling potential events or situations to provide reasonable assurance regarding the achievement of its business objectives in accordance with the requirements of the COSO Enterprise Risk Management Framework COSO (COSO ERM Framework).

Operational risk management is an integral part of corporate strategy formulation and is implemented by the Company's Board of Directors, management and staff.

**The category of ESG risks has been included in the Operational Risk Register**

Reference is made in the "Corporate governance" section of the same Report. ➔

## EYDAP's response to the COVID-19 pandemic

**In line with its corporate social responsibility towards its employees and citizens, EYDAP has harmonized its operation with specific health protocols and the relevant legal framework from the very beginning, while strengthening its digital services.**

**In order to ensure the protection of the health of employees and the uninterrupted provision of water supply and sewerage services, which are critical for the health of citizens, targeted measures were taken, tailored to the requirements of uninterrupted operation and the safety of employees.**



**EYDAP, having an active role in the challenges of the new conditions, collaborated with the National Kapodistrian University of Athens to conduct specialized analyses of wastewater as a predictive tool for the dissemination of COVID 19.**

## 1.7 EYDAP's Organizational Structure

The main operational body of the Company, after the Board of Directors, consists of the CEO, the Deputy CEO and 10 senior executives with many years of experience and dedication to their work.

The composition of the Board of Directors from January 1, 2022 to December 31, 2022:

<b>Theodora Varvarigou</b>	Chairman of the Board, Non-Executive Member
<b>Charalambos Sachinis</b>	CEO, Executive Member
<b>Anastasios Tosios</b>	Deputy CEO, Executive Member
<b>Ekaterini Beritsi</b>	Independent Non-Executive Director
<b>Alexandros Nasoufis</b>	Independent Non-Executive Director
<b>Michael Stavroulakis</b>	Independent Non-Executive Member
<b>Angelos Amditis</b>	Independent Non-Executive Member
<b>Dimitrios Konstantakopoulos</b>	Non-Executive Member
<b>Christos Karaplis</b>	Non-Executive Member
<b>Christos Mistriotis</b>	Non-Executive Member
<b>Panagiotis Skoularikis</b>	Non-Executive Member
<b>Emmanouil Angelakis</b>	Non-Executive Member
<b>Georgios Alexandrakis</b>	Non-Executive Member



The Senior Executives of the Company among others:

- (a) head independent areas of its activities & report directly to the CEO, appointed by a resolution of the Board of Directors, following a proposal by the CEO in which the responsibilities of each are specified;
- (b) attend the meetings of the Board of Directors, without voting rights, and may introduce the issues to be discussed in their area of responsibility, following a proposal by the CEO,
- (c) support the formulation of the Company's strategy and coordinate, direct and monitor the work of the organisational units under their responsibility; (
- (d) coordinate, monitor, direct and control the work of the organisational units under their responsibility, set up Working Groups with persons under their responsibility for specific issues under their responsibility and monitor their work, cooperate with each other to achieve the Company's objectives.
- (e) συντονίζουν, παρακολουθούν, κατευθύνουν και ελέγχουν το έργο των οργανωτικών μονάδων ευθύνης τους, συστήνουν Ομάδες Εργασίας με άτομα της ευθύνης τους, για ειδικά θέματα αρμοδιότητάς τους και παρακολουθούν το έργο τους, συνεργάζονται μεταξύ τους για την επίτευξη των εταιρικών στόχων.

The filling of the positions of the senior executives was carried out through transparent procedures. The curricula vitae of the senior executives are posted on the Company's website [eydap.gr](http://eydap.gr).

The Board of Directors oversees the assessment of corporate impacts on a quarterly, semi-annual, 9-month and annual basis. The Company's financial performance is disclosed annually and semi-annually, subject to an audit conducted by independent chartered accountants. In the year 2022, performance indicators were presented to the Board of Directors on four occasions.

## Organization chart

The objective of the Organizational Chart is to ensure the sustainability of the Company and its alignment with modern management practices in order to:

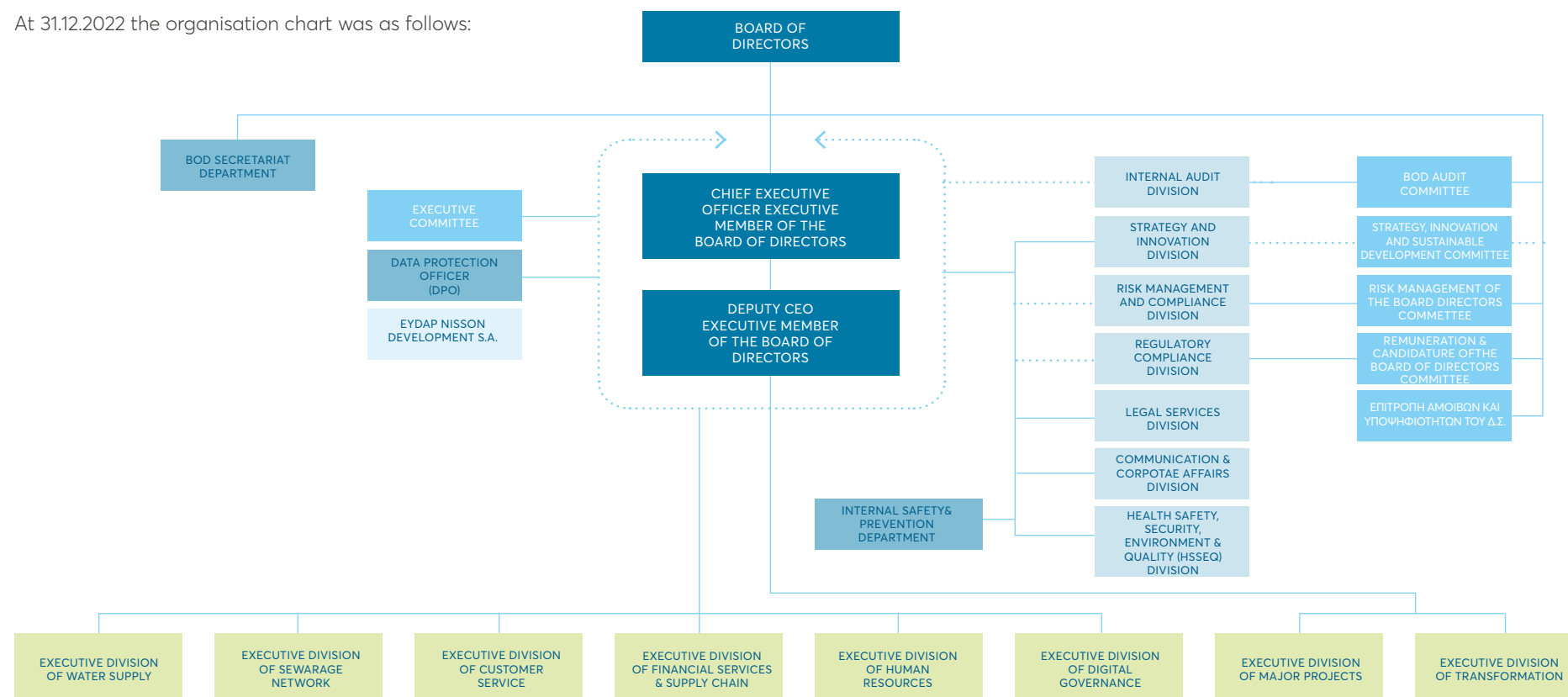
**Sustainable Development/Green Transition**

**Optimal use of infrastructure and strengthening of networks**

**Digital modernization of network management**

**Upgrading human resources skills and modernizing corporate resources**

At 31.12.2022 the organisation chart was as follows:



## 1.8 Participations & Recognition

EYDAP is a member of Greek, European and International Associations that promote international cooperation and monitor developments related to sustainable water management.

### MEMBER

- Association SA & RES
- AQUA PUBLICA EUROPEA
- Technical Chamber of Greece
- American-Hellenic Chamber of Commerce
- Greek Institute of Entrepreneurship & Sustainable Development
- Hellenic Institute of Customer Service
- Hellenic Business Management Society
- Global Water Operators' Partnership Alliance, UN Habitat
- CSR HELLAS

### PARTICIPATION

- European Benchmarking Cooperation (EBC) - for the creation of KPIs.
- National Consumer and Market Council

### Aqua Publica Europea (APE).

APE is an international non-profit association, whose members are exclusively public providers, whose sole purpose is to address water governance and related policy issues from a public management perspective. Aqua Publica Europea (APE) was founded in 2009 to promote and strengthen public management of water and sanitation at European and international level. The association facilitates and enhances the exchange of know-how and the implementation of joint projects between its members. The aim of cooperation is to develop international policy in these areas by promoting dialogue between public providers, the business sector, academia and various international organizations.

EYDAP is a member of Aqua Publica Europea (APE) since January 2017 which is the exclusive association of all public and municipal water and wastewater providers in Europe whose members include major companies such as Eau de Paris, Vivaqua of Belgium, CAP Milan, etc. EYDAP is the only member that is not wholly owned by the public sector. However, our European public utility counterparts support and embrace EYDAP's efforts to remain a publicly efficient company at the service of society.

At the beginning of **May 2023**, EYDAP participates in **the Leading Utilities of the World** network and received the **"Golden Tap" award**, for the Company's performance in the field of Public Utility services. The award represents the achievement of the highest level of service in this field.

Leading Utilities of the World (LUOW) is a network of the world's most forward-thinking utilities, as defined by the network's 14 distinct areas of innovation. Its members represent the gold standard of water innovation and performance in the developed world



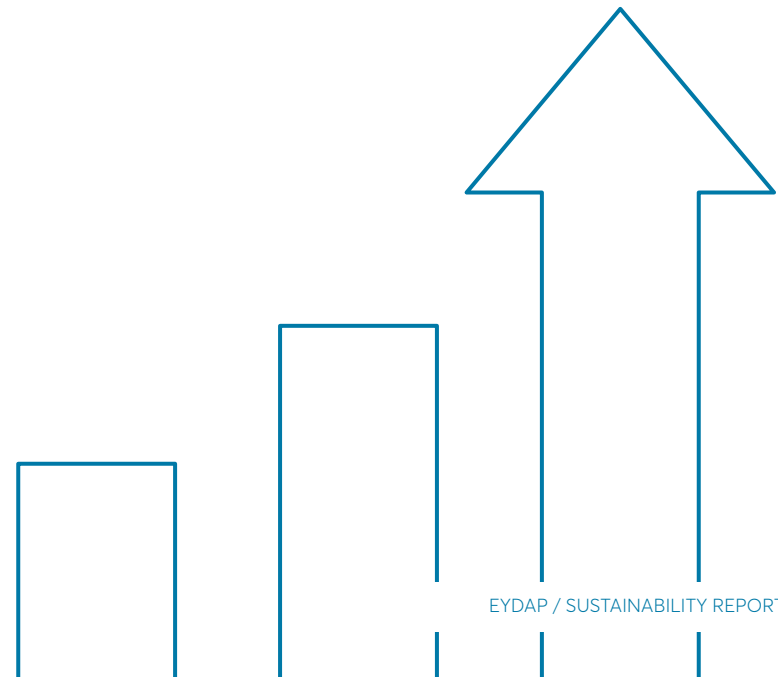


## MATERIAL TOPIC

# 1.9 Financial Performance

2022 was marked by the energy crisis and the resulting inflationary crisis that burdened citizens. EYDAP, always committed to its social role, supported consumers by maintaining its low rates, absorbed the increased costs, showing resilience and consistency, and doubled investments aiming for growth.

**EYDAP absorbed the shocks of the energy crisis and doubled its investment program without burdening consumers.**



## Key Financial Results

Detailed financial results in the Annual Financial Report.

	2021	2022	Y-O-Y
<b>Business units/activities</b>	3	3	
<b>Turnover</b>	360.8 million €	343.5 million €	-4.8% (+/-million €)
<b>Total Capital (K €)</b>	1.696.021	1.467.858	
<b>Total assets (K €)</b>	863,467	859,949	
<b>Total water consumption billed</b>	406.8 million m <sup>3</sup>	388.2 million m <sup>3</sup>	-4.5%
<b>Total operating costs</b> (sum of Cost of Sales, Administrative Operating Expenses, Disposal Operating Expenses and Impairment of Financial Assets).*	317.6 million €	335.8 million €	+5.7%
<b>EBITDA</b> earnings before tax, financial investment income and total depreciation and amortization)	85.5 million €	39 million €	-46.5 million € -54.4%
<b>EBITDA margin</b>	23.70%	11.35 %	
<b>EBIT</b> (earnings before tax, financial and investment results)	46.3 million €	0.117 million €	-46.2 million € -100%
<b>EBIT margin</b>	12.80%	0%	
<b>Profit before tax</b>	59.4 million €	10.6 million €	-48.8 million € -82%
<b>Profit after tax</b>	30.7 million €	5 million €	-84 %
<b>Net profit margin</b>	8.5 %	1.5 %	
<b>Free Cash Flows to the Firm</b> The Company applies a cash management regulation for the continuous monitoring of its cash flows **	19.5 million €	79.6 million €	

\* The change is mainly due to the increase in electricity supply costs, which amounted to €45.5 million from €22.9 million in 2021, an increase of 98%. On the other hand, the €15.1 million reduction in various forecasts had a positive impact on operating costs. Expenses were also negatively impacted by the €8.7 million increase in other expenses, mainly due to a forecast of impairment of other receivables due to their non-recoverability.

\*\* mainly due to the disbursement in 2022 of EUR 157 million to the EYDAP Fixed Assets Company for the final settlement of the additional cost of untreated water for the years 2013-2020, for which a provision had been made at 31.12.2021.

**Total consumption in 2022 decreased by -4.5% compared to 2021.**

The decrease in the volume of water consumption is mainly due to the change in consumption habits of households, as a result of the energy crisis, the implementation of a stricter program of overdue debts, combined with statistically lower temperatures.

**In contrast to the total, billed consumption increased by 3.9%, resulting in a decrease in non-billed consumption.**



## Shareholder Composition

Shareholder Composition 31.12.2022	2021			2022		
	Shares	Shareholders	%	Shares	Shareholders	%
Hellenic Corporation of Assets and Participations S.A. (HCAP)	53,250,001	1	50%+1 share	53,250,001	1	50%+1 share
HRADF	12,069,739	1	11.33%	12,069,739	1	11.33%
Legal entities	32,895,102	299	30.89%	32,708,870	318	30.72%
Natural persons	8,285,158	22,208	7.78%	8,471,390	21,615	7.95%
<b>Total</b>	<b>106,500,000</b>	<b>22,509</b>	<b>100.00%</b>	<b>106,500,000</b>	<b>21,935</b>	<b>100.00%</b>

**Share Key Data ΕΥΔΑΠ ΑΕ 2022 Number of Shares = 106,500,000**

**Share price at the end of the year/period = 6.8 €**

**Capitalisation at the end of the year/period = 724,200,000**

The Board of Directors of the Company at its meeting on 28.04.2022 approved the proposal to the Annual General Meeting of Shareholders, for the distribution of dividend, according to article 160 of Law 4548/2018, of two cents (Euro 0.02) per share, (total gross amount of Euro 2,130,000) for the financial year 2022.

For 2023, the Company is focusing on rationalizing operating costs, with emphasis on energy costs, accelerating the implementation of the investment program focusing on the East Attica projects and the projects to reduce unpriced water that will improve the environmental footprint, improving the services provided, expanding the activities and the customer base.

### Main non-financial risks

For EYDAP, the existence of positive financial performance based on ESG criteria recommends:

- Practical application of business ethics
- Implementation of corporate continuity
- A key factor in the transformation of the company in line with its strategic objectives
- Satisfaction of all its stakeholders.



## Our impacts

### Economic Strategy

EYDAP identifies, categorizes and scores operational risks and implements preventive action plans to address potential credit risk, liquidity risk, market risk, regulatory risk, etc. The inventory of risks and their management is detailed in the Annual Report 2022 (pages 31-43).

EYDAP operates in accordance with the Corporate Governance Code, National and Community Law (Tax Law, International Financial Reporting Standards) and the Internal Operating Regulations. The above constitute a framework of corporate constraints that safeguards the interests of all stakeholders. For the proper implementation of the provisions of the above framework, EYDAP is subject to regular audits by an Audit Firm

### Oversight of EYDAP

By Law 5037/2023 (Government Gazette A' 78), its oversight was transferred to the Ministry of Environment and Energy, while oversight of the provision of water services and urban waste management was assigned to the new Regulatory Authority for Energy, Waste and Water (RAEWW). *For details see Annual Financial Report p. 33.*

The purpose of the law is the rational regulation of the provision of water supply and urban waste treatment services, in particular as regards the organization, the services provided, their cost and pricing, through the delegation of relevant supervisory and control powers to the Regulatory Authority for Energy, Waste and Water (RAEWW).

## Investment program

### Planned investments:

#### East Attica projects

**~900 million**

90% of the projects have been financed by the EU

#### Transformation projects

**~400 million**

#### Water network replacement projects to reduce leaks

**~200 million**

#### New activities increase the company's ability to target the development of new services and markets

**~250 million**





The 10-year investment plan 2023-2032 includes

**Projects with a gross budget of  
€1,717 million,**

where for all projects,

**is expected to be financed  
by the European Union**

**€722 million (42%)**

In 2022, the absorption of the  
investment programme amounted to

**€30.5 million**

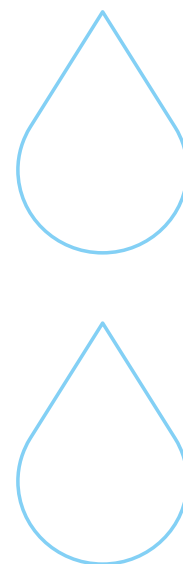
**increased by 66%**

compared to the absorption in 2021

which had amounted to €18.3 million and

**increased by 107%**

than the average absorption  
of the previous five years.



The bulk of the investment program concerns major sewerage projects in eastern Attica, but also water supply network projects (installation of new water supply network works, extensions, improvements and replacements) and sewerage network projects (construction of property connections & secondary sewerage network, reconstruction of discharge pipes).

EYDAP Wastewater Network ➔ Wastewater Collection & Treatment ➔ East Attica projects ➔

**The budgeted amount of the investment program for 2023 amounts  
to €45.9 million, with**

**52%** of the total amount for sewerage projects in eastern Attica

**28%** for water supply projects

**14%** for sewerage projects

**6%** for other categories.

**Almost 50% of the projects are financed by the EU.**

## EYDAP's Pricing policy

**EYDAP's PRICING POLICY** is exercised through the application of the general rules of costing and pricing of water services to be determined by a ministerial decision, while the tariffs for water services for the various categories of consumers and users are approved by a five-year decision of WEWRA.

**Until the approval of the new rates,  
the validity of the company's rates is  
extended.**

EYDAP's existing rates are tiered incremental both to protect the water resource and to ensure citizens' access to our services.

The **incremental tiered rates** have the following general characteristics:

- H An increase in water consumption beyond a certain threshold leads to a move to monthly water consumption tiers to which a higher water price per cubic meter corresponds. Therefore, an increase in water consumption beyond a certain threshold implies a non-proportional increase in both the consumers' charges and the revenues of EYDAP from the provision of water services.
- Limits overconsumption of water and acts as a conservation factor for the natural resource.

**The pricing of sewerage services  
consists of 75% of the water rates for  
the general rates.** ➔

*Reference to our service pricing in the "Secure Customer Service - Affordable Rates" section of the same Report*

## Taxonomy Regulation

The overall economic activity includes only eligible activities under the EU Taxonomy Regulation, which is the European Classification System for environmentally sustainable economic activities. *For details see the corresponding section of the same Report* ➔

## Our Approach to Taxation

We are committed to complying with all tax regulations in all processes in which we operate. We do not operate through artificial structures or structure our business in ways that seek to avoid taxation. We do not have a presence in so-called low-tax countries. Although taxation is always among the many considerations when making business decisions, it is not the main factor in the decision-making process

### Tax management and governance

Given that EYDAP SA operates within Greek territory, it is a given that it is subject to all the laws and regulations governing public limited companies within the Greek territory. The purpose of the tax function is to support and enable business objectives while ensuring compliance and preventing or minimizing tax risks. The Company fully complies with the Code of Tax Procedure, Law 4172/13 and Law 4174/13 and the related decisions and circulars.

The Company has been subject to the tax audit of the Chartered Accountants, in accordance with the regime provided for by the provisions of par. 5 of article 82 of Law 2238/1994 (fiscal years 2011 and 2013) and by the provisions of article 65A of Law 4174/2013 (fiscal years 2014 to 2021). Also for the fiscal year 2022 the Company has been subject to the tax audit of the OEL as provided for by the relevant provisions, (reference to the annual report p. 184). This audit is in progress and the relevant tax certificate is expected to be issued promptly.

Strategic decisions are taken by the Company's Board of Directors following recommendations from the organizational units that take into account any tax charges. The recommendations indicate the tax risks that may arise from taking the relevant action.

The Company's Management and Finance Department are responsible for ensuring compliance with the tax legislation.

The successful processing of the Company's transactions with the Athens Public Financial Service for the Taxation of Public Limited Companies is certified by the receipt of the **Tax Compliance Report of the Independent Certified Public Accountant, in accordance with the provisions of article 65A of the Code of Tax Procedure (Law 4174/2013).**

The Company's management makes provisions in the financial statements for tax risks as reflected in the financial report.

*Reference to the annual report p. 185.*

### Interactions with tax authorities

We seek a cooperative relationship with the tax authorities. We respond to requests for information, either formally or informally. During 2022, we did not participate in public policy regarding tax legislation or changes in tax legislation in any of the businesses in which we operate.

### Tax planning

We ensure that the tax profile of our activities is aligned with the essence of our business operating structures. Ensuring the principle of equidistance is achieved through the preparation of an intra-group transaction documentation file in accordance with the letter of the law which requires intra-group transactions to be carried out on an arm's length basis.

### Tax Risk Management

The Group has recorded a provision in the financial statements to address the risk of tax audits or other unforeseen events.

## Climate Change Related Risks

The Company, with full recognition of the impact of climate change on water supply and wastewater management companies such as EYDAP, has included them in its business risk register and has already developed contingency plans and specific procedures.

In this context, it should be noted that according to Article 7 "Obligation to supply untreated water" of the current contract with the Greek State: "The State is obliged throughout the Contract Period to supply the Beneficiary with Untreated Water in accordance with the terms of this Contract and in any case on the basis of the criteria set out in Articles 8 (Quantitative Characteristics) and 9 (Qualitative Characteristics) of this Contract."

As part of adopting international best practices in its efforts to align with ESG criteria, it intends to follow in 2023 the Total Carbon Financial Disclosures (TCFD) recommendations issued by the Financial Stability Board (FSB). The aim is that through the adoption of the TCFD recommendations, financial risks and opportunities related to climate change will become a natural part of the Company's risk management processes and strategic planning.

## Defined Benefit Plans and Other Retirement Plans

The estimated value of the Defined Benefit Plans in the Company's Financial Statements as at 31 December 2022 is €282,342K. This amount is covered by the Company.

There is no (independent of the Company) fund that covers this amount.

The value of the assets of 2 of the 4 plans (special lump-sum accounts) amounts to €22,280K as at 31.12.2022, covering 20% of the corresponding liability. These funds have mainly been generated by employee contributions. This amount is held in the Company's Funds and Cash Equivalents.

Employee participation in these plans is up to 100% except for the health care plan where certain categories of employees such as engineers opt for their sectoral health care fund.

In addition to the Defined Benefit Plans, the Company also offers Defined Contribution Plans for certain categories of employees such as engineers, lawyers and doctors where the corresponding expense for the Company, as of December 31, 2022, amounted to €339K.

## State Financial Assistance

The Company is subsidized by the European Union through the Greek State for the financing of specific projects.

In addition, the Company's customers (including the State and municipalities) participate in the financing of the initial cost of the network development (meters, network connections, etc.) or its upgrade. The related one-time fees charged to customers prior to June 30, 2009 (i.e., earlier than the effective date of International Financial Reporting Standards Interpretations Committee 18, which was not applied retrospectively), were accounted for by the Company as deferred revenue and recognized as revenue over the useful lives of the related fixed assets. With the adoption of International Financial Reporting Interpretations Committee 15, the

amount of EUR 33,259K that was included as deferred income in the Statement of Financial Position as of January 1, 2018 under the line item "Investment grants and consumer interests" was recognized in the retained earnings of the Company and the Group. The above grants and 22% royalty income are accounted for when received and are disclosed in the Statement of Financial Position under non-current liabilities. These amounts represent deferred income and are amortised over the estimated lives of the related assets when they are placed in service. Amortisation of grants and 22% royalty income is shown as a deduction from depreciation of fixed assets in the income statement. In addition to the above grants, the Company has also received other types of government grants, such as the concession of the island of Psitallia used by EYDAP SA for the operation of the wastewater treatment plant.

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### The depreciable value of the grants as of 31 December 2022 amounts to €149,918K.

In 2022 the Company received grants (depreciable) with a total value of **€17,869K**.

In 2022, the Company received research project grants of **€ 117K** included in other operating income (non-amortizable).

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## Monetary donations

The Company does not make any donations, monetary or non-monetary, to political persons, political parties.

## Compliance with regulations and laws and non-imposition of fines

**As a result of compliance, no fines were imposed in 2022 in relation to the Company's financial activity.**



## 2.

# MATERIALITY ANALYSIS FOR SUSTAINABLE DEVELOPMENT

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2.4	Linking Material Topics to Sustainable Development Goals	55





## Linking material topics to the Sustainable Development Goals

In 2021, EYDAP adopted a long-term Sustainable Development Strategy aiming at its sustainable transformation and further strengthening its leading position in Greece's water market.

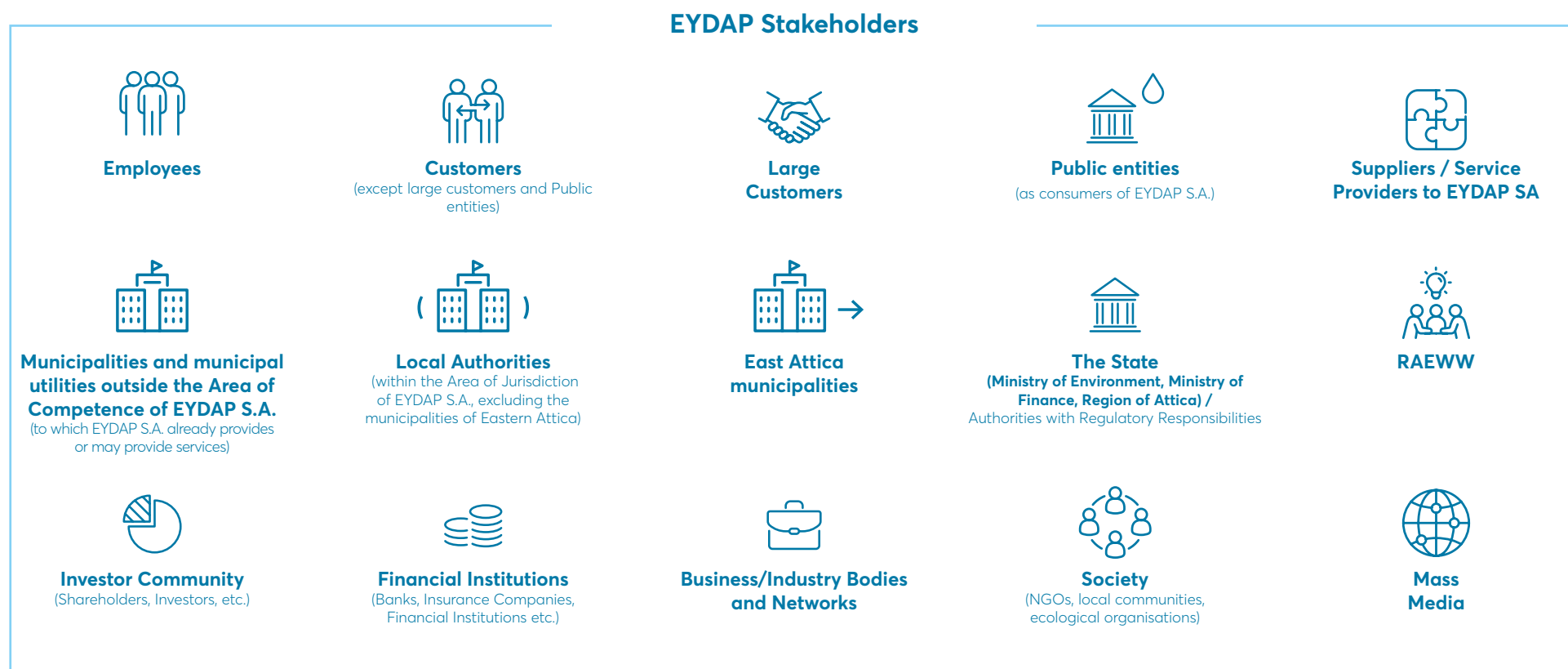
The highlighting of essential issues are the strategic pillars of the Company's Sustainable Development and are linked to short and long-term goals, KPIs, actions and initiatives.

## 2.1 Dialogue with the Stakeholders

EYDAP recognizes as stakeholders the Entities, Organizations, Public & Private Legal Entities and Natural Persons that are affected or may be affected by its actions. Stakeholders are also its employees.








The materiality analysis was based on the identification of 2021 stakeholders and concerns the entities and natural persons with whom it maintains contact and exhibits interaction by developing and enhancing a structured dialogue.

The Table of identified stakeholders was updated and approved by Senior Management (CEO & Deputy CEO). The Company is in constant communication with its stakeholders with a view to strengthen the trust relationship with them.













## Stakeholder table – ways of communication

Key Identified Stakeholder Groups		Frequency and Ways of Communication
	<b>Employees</b>	<ul style="list-style-type: none"> <li>• Daily in person and by email</li> <li>• Inspections</li> <li>• Via Intranet (thalassa)</li> <li>• Training</li> <li>• Participation in annual workshops</li> <li>• Weekly electronic magazine " I PIGI MAS "</li> <li>• Participation in the prioritisation process of Material topics</li> <li>• Voluntary actions</li> <li>• Annual Sustainable Development Report</li> <li>• Participation in Annual Workshop</li> </ul>
	<b>Customers</b> (except large customers and Public entities)	<ul style="list-style-type: none"> <li>• Personal contact (Regional Centers) - email</li> <li>• 24hour telephone service 1022</li> <li>• Social media</li> <li>• Corporate website</li> <li>• Click2Call: charge-free service</li> <li>• eEYDAP &amp; EydApp: digital processing of requests</li> <li>• Customer satisfaction survey</li> <li>• Participation in the prioritisation process of the of Material topics</li> </ul>
	<b>Large Customers</b>	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• 24hour telephone service 1022</li> <li>• Click2Call: charge-free service</li> <li>• eEYDAP &amp; EydApp: digital processing of requests</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Public entities</b> (as consumers of EYDAP S.A.)	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• 24hour telephone service 1022</li> <li>• Click2Call: chargefree service</li> <li>• eEYDAP &amp; EydApp: digital processing of requests</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Suppliers / Service Providers to EYDAP SA</b>	<ul style="list-style-type: none"> <li>• Personal and via email communication</li> <li>• Onsite visits</li> <li>• Continuous calls for tenders for projects</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Local Authorities and municipal utilities outside the Area of Competence of EYDAP S.A.</b> (to which EYDAP S.A. already provides or may provide services))	<ul style="list-style-type: none"> <li>• Personal and email &amp; telephone communication</li> <li>• Corporate Website</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Local Authorities</b> (within the Area of Jurisdiction of EYDAP S.A., excluding the municipalities of Eastern Attica)	<ul style="list-style-type: none"> <li>• Personal and via email communication</li> <li>• Telephone communication</li> <li>• Corporate Website</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>



Key Identified Stakeholder Groups		Frequency and Ways of Communication
	<b>East Attica municipalities</b>	<ul style="list-style-type: none"> <li>• Ongoing personal and email communication on project effectiveness</li> <li>• Creation of a dedicated website named "Clean Water"</li> <li>• Information events with the presence of local authorities</li> <li>• Open discussions with the public</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>The State</b> (Ministry of Environment, Ministry of Finance, Region of Attica) / <b>Authorities with Regulatory Responsibilities</b>	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• Participation of EYDAP staff in a legislative committee</li> <li>• Corporate Website</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>RAEWW</b>	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Investor Community</b> (Shareholders, Investors, etc.)	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• Extraordinary and ordinary shareholders' meetings on an annual basis</li> <li>• Financial results on an annual/ semiannual basis</li> <li>• Nonfinancial reporting</li> <li>• Notification of current business developments (press release)</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Financial Institutions</b> (Banks, Insurance Companies, Financial Institutions etc.)	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Business/Industry Bodies and Networks</b>	<ul style="list-style-type: none"> <li>• Personal and email communication</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Society</b> (NGOs, local communities, ecological organisations)	<ul style="list-style-type: none"> <li>• Corporate Website</li> <li>• Email</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>
	<b>Mass media</b>	<ul style="list-style-type: none"> <li>• Press releases</li> <li>• Press Briefings</li> <li>• Corporate website</li> <li>• Social media</li> <li>• Participation in the prioritisation process of Material topics</li> </ul>

The frequency of communication with stakeholders is tailored to the specificities and needs of each group.

## 2.2 Materiality analysis

Following the new GRI Standards (GRI Standards 2021), EYDAP S.A. has identified, assessed and prioritised the impacts of the Company's activities, positive or negative, actual or potential, on its external environment (impacts on the economy, the environment, people and the wider society).

Through the process of identifying its impacts, EYDAP has defined its material Sustainability Issues, i.e. those issues that reflect the Company's most significant impacts on the economy, the environment and society.

Next, the methodology followed in the materiality analysis is presented:

### 1. Identification of the Company's positive and negative impacts

Initially, EYDAP, through interviews with relevant departments, identified its positive and negative impacts, actual or potential, affecting the economy, the environment and society.

### 2. Assessment and prioritisation of the Company's impacts

At this stage, the Company proceeded to evaluate the impacts identified by the internal meetings and to prioritise those. The assessment and prioritisation were carried out with input from members of senior management. The most significant impacts were grouped into broader categories under 14 material topics, which are linked to all three ESG pillars (Environment, Society, Governance).



## 2.3 Assessment and prioritisation of material topics

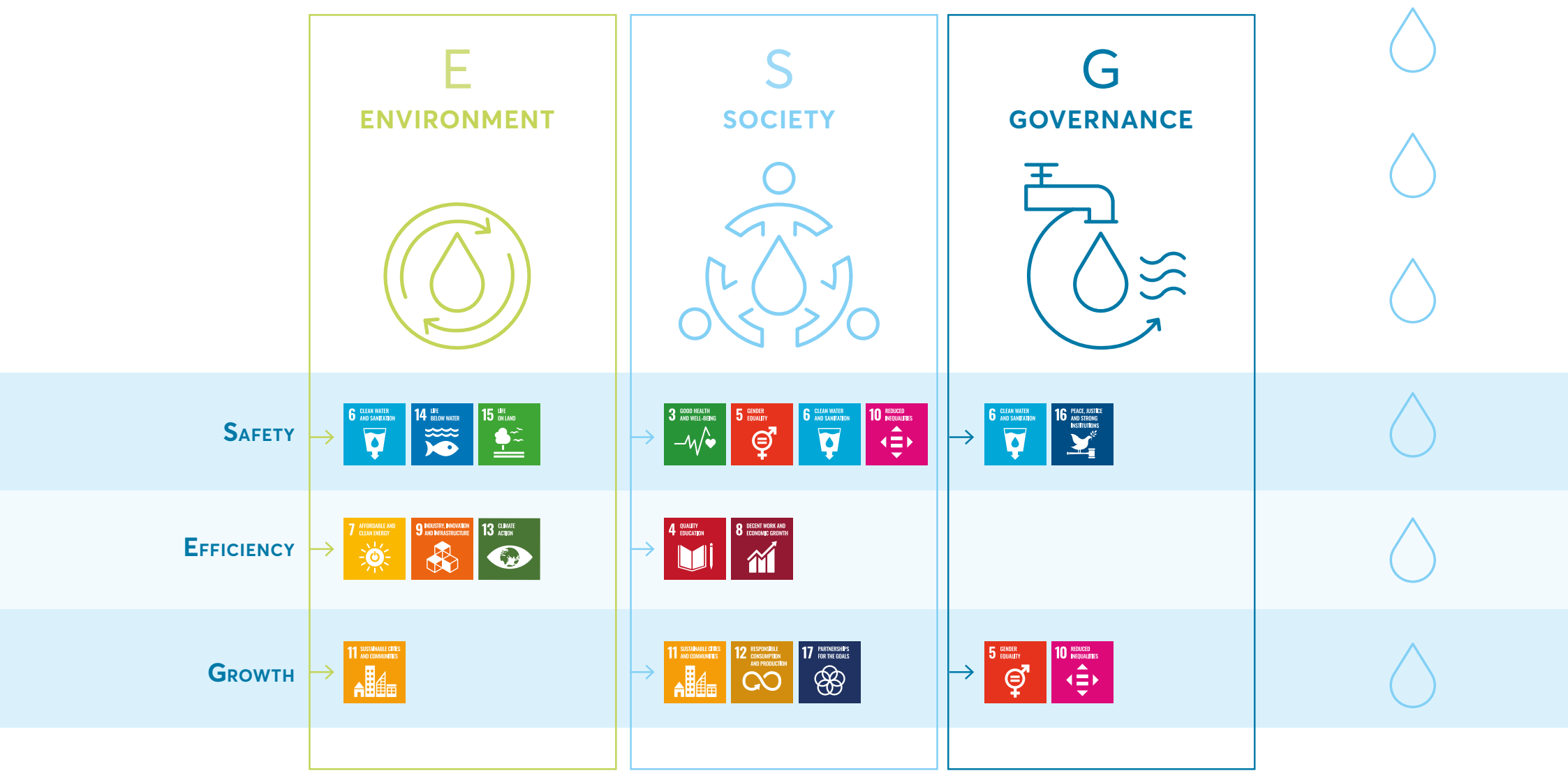
The finalised material topics were assessed and prioritised by the key stakeholders that affect the Company and are affected by its activities. Specifically, an online survey was conducted in which representatives from the identified stakeholder groups participated in order to evaluate and rank the material topics that emerged from the identification of EYDAP's impacts.

### Prioritisation of material topics by stakeholders



EYDAP's response and the management of material impacts is the content of this Report.

# 2.4 Linking Material Topics to Sustainable Development Goals





## 3.

# ENVIRONMENT (E)

### Material Topic

- |     |  |    |
|-----|--|----|
| 3.1 | Sustainable Management of Natural Resources/<br>Water Supply Resources | 58 |
|-----|--|----|

### Material Topic

- |       |                                |    |
|-------|--------------------------------|----|
| 3.2   | Protection of Ecosystems       | 67 |
| 3.2.1 | Protection of Marine Ecosystem | 67 |
| 3.2.2 | Protection of Biodiversity     | 69 |

### Material Topic

- |       |   |    |
|-------|---|----|
| 3.3   | Climate Change Adaptation               | 71 |
| 3.3.1 | Emissions                               | 72 |
| 3.3.2 | Energy                                  | 78 |
| 3.3.3 | Climate Change<br>Mitigation Strategies | 86 |

### Material Topic

- |      |  |    |
|------|--|----|
| 3.4. | Circular Economy                               | 90 |
| 3.5  | Regulatory & Environmental<br>Compliance EYDAP | 99 |



We manage the water resource  
**with responsibility and sensitivity.**

**95% free of its pollutant load** returns to the environment.

We adopt the principles of the **circular economy** steadily reducing our environmental footprint.





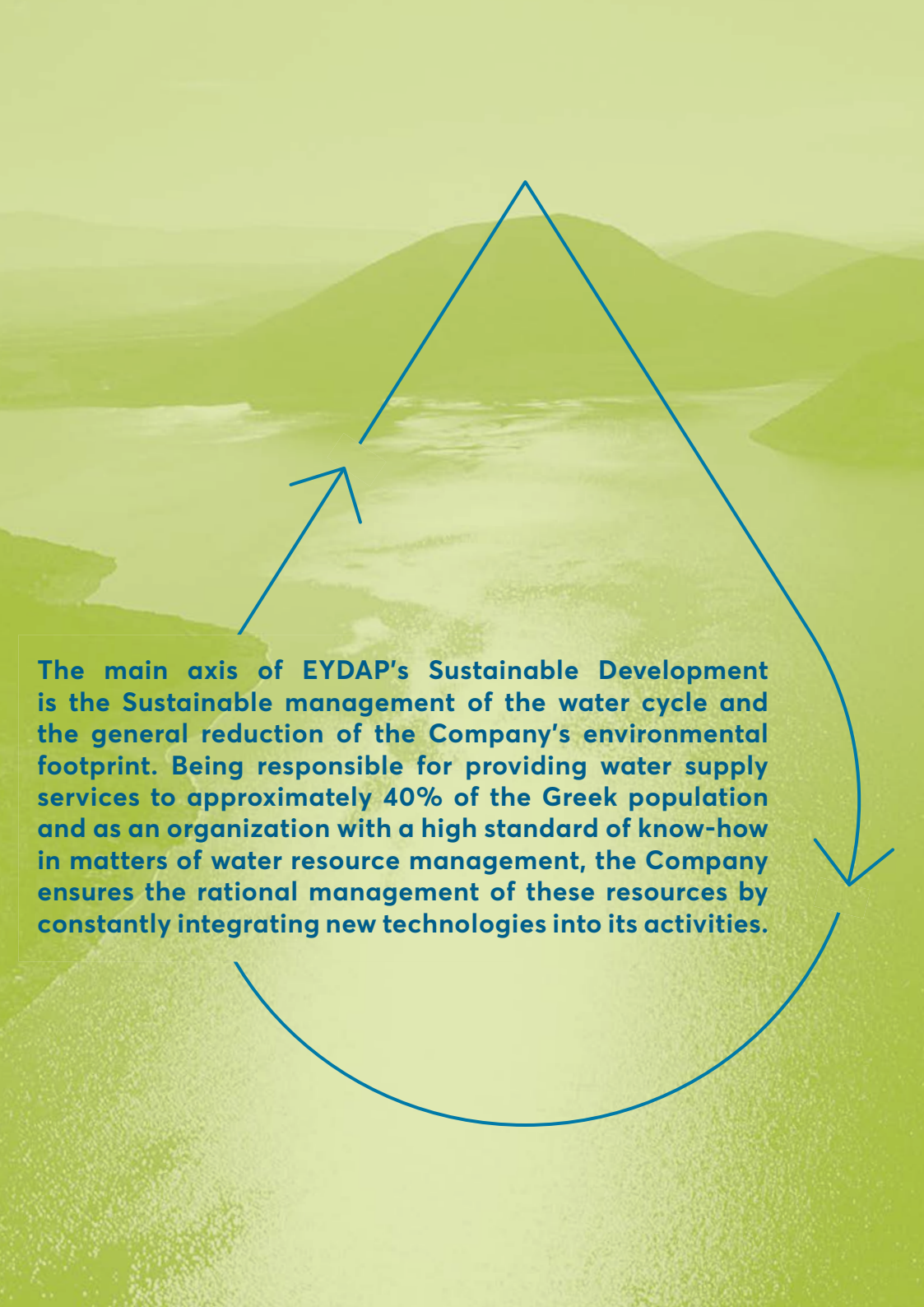
## MATERIAL TOPIC

### 3.1 Sustainable Management of Natural Resources/Water Supply Resources

Natural resources are defined as all the primary and basic goods provided by Nature. The rational use and exploitation of natural resources without burdening the environment, while at the same time caring for and protecting the environment, is part of the Company's corporate responsibility and a vital factor for its growth.

**Water is one of the most important natural resources for the existence of life; it is an irreplaceable and quantitatively limited good.**

The ever-increasing demand for water worldwide, man-made water pollution and climate change are some of the risks we face today, which have led to the need for holistic, preventive and consistent management of water resources.



**The main axis of EYDAP's Sustainable Development is the Sustainable management of the water cycle and the general reduction of the Company's environmental footprint. Being responsible for providing water supply services to approximately 40% of the Greek population and as an organization with a high standard of know-how in matters of water resource management, the Company ensures the rational management of these resources by constantly integrating new technologies into its activities.**



# Our impacts

## Sustainable Management of Reservoirs

EYDAP procures the raw water exclusively from the Greek State at the entrance of the Water Treatment Plants, with the only exception being the Mavrosouvala boreholes, which are owned by EYDAP. The management of reservoirs primarily aims at ensuring the quantitative and qualitative sustainability of the resource.

The raw water comes from the **surface water resources** of the drainage basins of **Marathonas, Yliki, Mornos and Evinos** and the backup underground water resources which can be utilised through the operation of boreholes depending on the availability of underground resources and the policies regarding their use.

### EYDAP ensures the protection of reservoirs by:

- strictly adhering to legislation (Health Regulation A5/2280/1983) "on the protection of water used for the water supply of the Athens region against pollution and contamination" and to Presidential Decree 51/2007 on establishing measures and procedures for the integrated protection and management of water, in compliance with the provisions of Directive 2000/60/EC;
- inspecting the works and activities in the protection zones of the reservoir drainage basins;
- performing sample measurements to test the quality of the water in the reservoirs

### The applied water resource management methods are characterised by:

- Science-based rationality
- Efficiency: as they make optimal use of water resources
- Sustainability: as they do not cause the exhaustion of water resources in the future by covering current needs

Detailed reference to this issue in the section titled "Access to Clean Water, Water Supply & Water Network Coverage" ➔



## Reservoirs

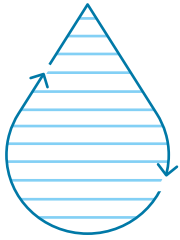
Marathonas

Yliki

Mornos

Evinos





## Sustainable Management of Water Supply Network & Assets (Smart Grid)

With the primary goal of ensuring the Sustainability of the water resource and covering water supply needs, EYDAP manages water demand by developing leakage reduction programmes (pressure management, water zones, immediate repair of failures/breaks, etc.).

As part of the reform being implemented with the aim of modernising and optimising network and asset management, the Company is in the process of developing a "Smart Grid".

**The smart grid regulates and controls the production and distribution of the resource, and aims at forming a smart connection between consumers and production, the ultimate goal being to create a more cost-efficient and safe network with reduced losses.**

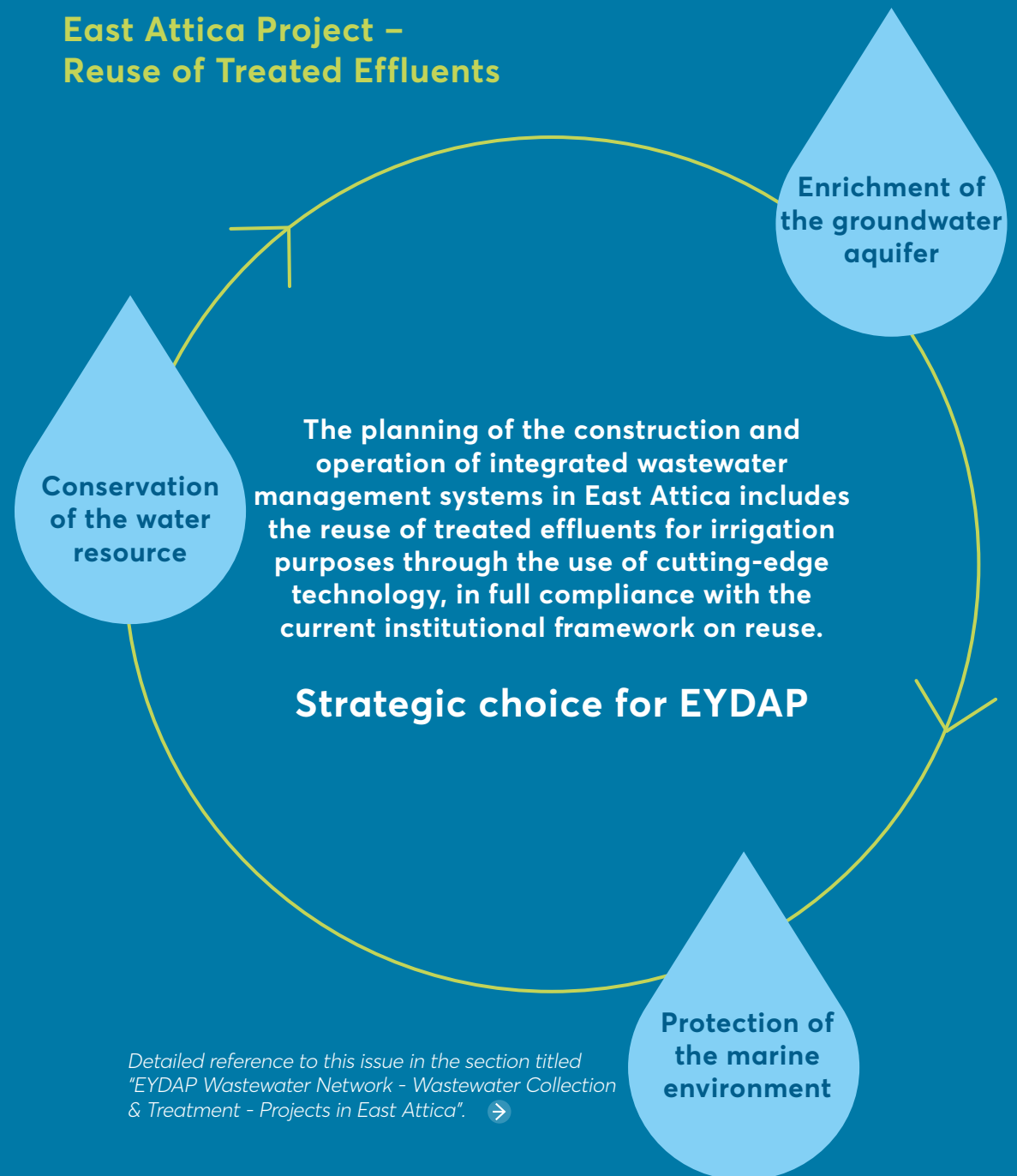
*Detailed reference to this issue in the section titled "Reliable Water Supply Network" ➔*

## Tiered Tariff

Tiered pricing acts as a deterrent to the waste of the natural resource and raises awareness among consumers to apply rational use of the resource.

*Detailed reference to this issue in the section titled "Secure Customer Service - Affordable Tariff" in this Report. ➔*

## East Attica Project – Reuse of Treated Effluents



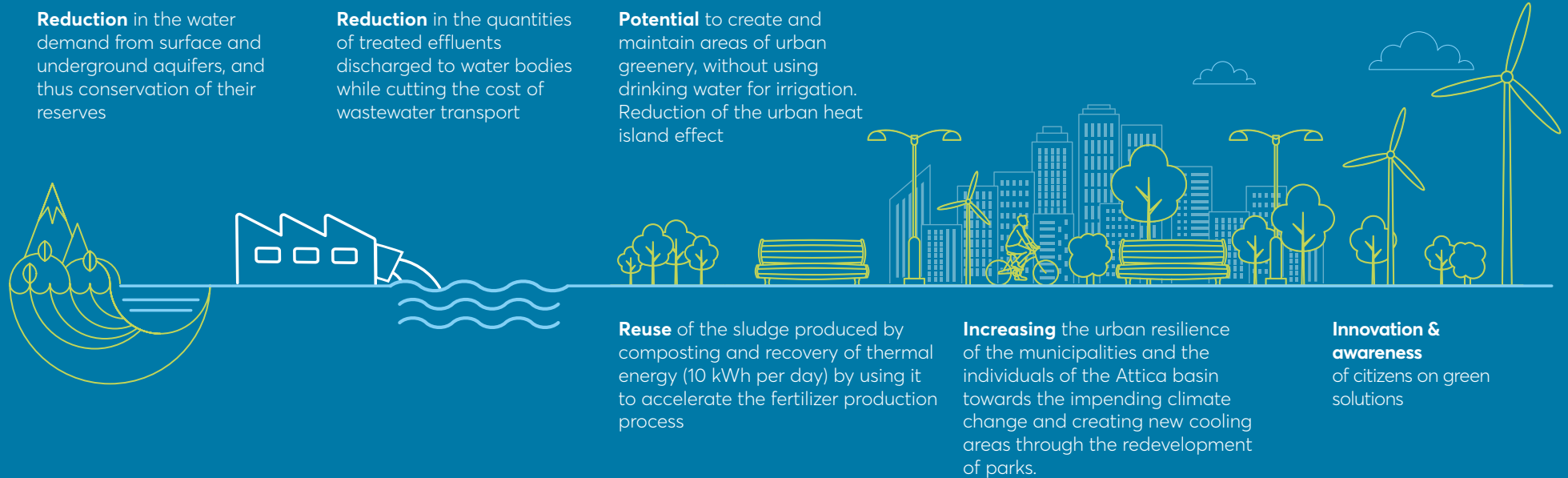


## Reuse by direct abstraction from the network (sewer mining)

Water reuse and recycling is gaining momentum in Sustainable Urban Development, highlighting the central role of water through the water-energy-material triptych, which is the focus of the circular economy.

EYDAP implements research projects aiming at decentralised reuse of non-potable water, with on-site utilisation of treated wastewater directly from the sewerage network, through the innovative Sewer Mining (SM) technology. This is an essentially mobile wastewater treatment plant.

### The Social and Environmental benefits of Sewer Mining technology



## EYDAP is pioneering

since 2016, It is being responsible for the operation of **two Model Sewer Mining Plants** by applying new technologies for the treatment and production of reusable water.

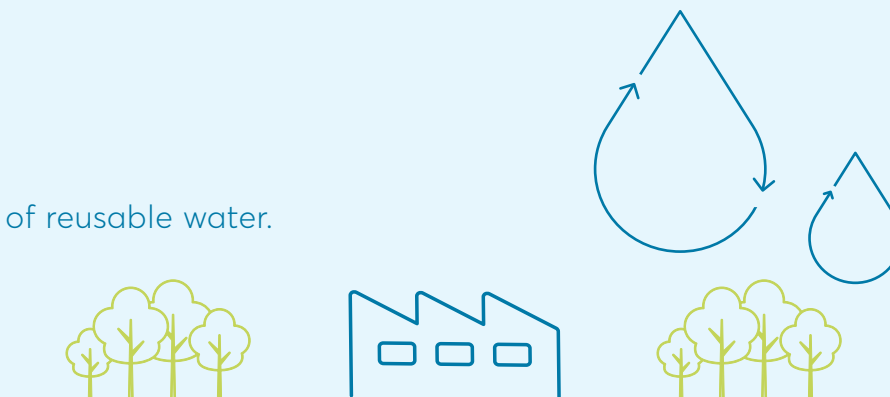


The **first Plant** has been operating since 2016 on the Company's premises in Metamorfosi in Attica region, in the framework of the European research project DESSIN.

The Plant produces

**12 m<sup>3</sup>/day**  
of recycled water

which is used for the irrigation of the surrounding area.



The **second Plant** has been placed at the Athens Municipality garden nursery, as part of the European research project NEXT-GEN, as a result of the cooperation of EYDAP with the NTUA, Chemitec and Biopolus companies and the Municipality.

The Plant produces

**25 m<sup>3</sup>/day**  
of recycled water

which is tested by the Chemical Laboratory for Research & Environmental Applications in terms of its harmonisation with the requirements of the legislation, and is used for the irrigation of ornamental plants on the Municipality's premises in Goudi.

**EYDAP verifies the quality of the water produced by the two above Plants as to its suitability for irrigation, with weekly sampling and chemical analyses. The produced water meets all national and international criteria for unrestricted irrigation and urban use while, at the same time, due to the high nutrient content of the water, there has been a very positive effect on plants and biodiversity of the local ecosystem.**

In 2022, more than 60 participants from 30 European organizations, Research Institutes, Technology and Water Companies had the opportunity to discuss in person the final results of the pilot project at the Athens Plant Nursery, and to witness first-hand the demonstration of the circular economy solutions implemented at the Municipality of Athens Plant Nursery.



## EYDAP's Goal for 2023

**is to install a third Sewer Mining water reuse unit in the Municipality of Markopoulo, through the European IMPETUS program, whilst it plans a new business model to expand the technology to other areas of Greece, having examined and classified 50 parks in and outside Attica, where the technology could be used, increasing the urban resilience of municipalities against climate change.**

**The technology can be applied by providing high quality non-potable water for municipal irrigation and irrigation of EYDAP's facilities as well as for irrigation of private individuals' properties within the Attica basin and for industrial use.**





## Hadrian's Aqueduct as a Water Resource

EYDAP, in the framework of the holistic utilisation of Hadrian's Aqueduct, actively participates in: :

**The utilisation** of non-potable water to cover local irrigation needs

**The reduction** of local environmental pressure in the 8 Municipalities traversed by Hadrian's Aqueduct through modern impactful projects for local communities

**Its designation** as a Cultural Heritage Monument

*Detailed reference to this issue in the section titled "Cultural Heritage Management".* ➔

**Raising public awareness** about the protection of water resources, the distinction between the uses of water (drinking and non-drinking) and education aimed at cultivating an eco-friendly consumer culture





## Pilot program CULTURAL HIDRANT

EYDAP, in partnership with the Municipality of Chalandri, continues to run the pilot European co-funded program UIA05-255 **CULTURAL HIDRANT**, which aims to supply a non-potable water network for irrigation use.

**3,133,296 euros**  
Total budget

The project includes:

**Construction of a 6 km non-potable water supply network from Hadrian's Aqueduct to the Municipality of Halandri**

**Installation of 100 smart water meters**

**savings of >10,000 drinking water and a total quantity of 45,000 - 90,000 m<sup>3</sup> of water/year**

In 2022

**EYDAP started the tender procedure for the construction of the irrigation network in Halandri**

**44 beneficiaries** of the non-potable water network in Halandri will be directly connected to the network and several residents will be served by the municipality's water trucks..

**EYDAP's mobile application, "Drop a Message"**, aims to highlight the potential of using non-potable water. It will be coupled with a special social media campaign to register for the application



## Target for 2023

**Announcement of the tender procedure of the 3.37 km long irrigation green network of the municipality of Halandri at the beginning of the year.**

## PARTNERSHIPS for the holistic management of Hadrian's Aqueduct

EYDAP, aiming at the integrated utilisation of Hadrian's Aqueduct, participates in the design of a proposal for an Integrated Spatial Investment (ISI) that falls under the Sustainable Urban Development (SUD) axis of the NSRF 2021-2027, in cooperation with the Ministry of Culture & Sports, the Region of Attica and the Municipalities located along the route of the underground aqueduct from the foothills of Parnitha to Kolonaki, with a total length of more than 20 km.

EYDAP is in the final phase of signing a Memorandum of Understanding and Cooperation with the Ministry of Culture and Sports for the management and exploitation of its water.

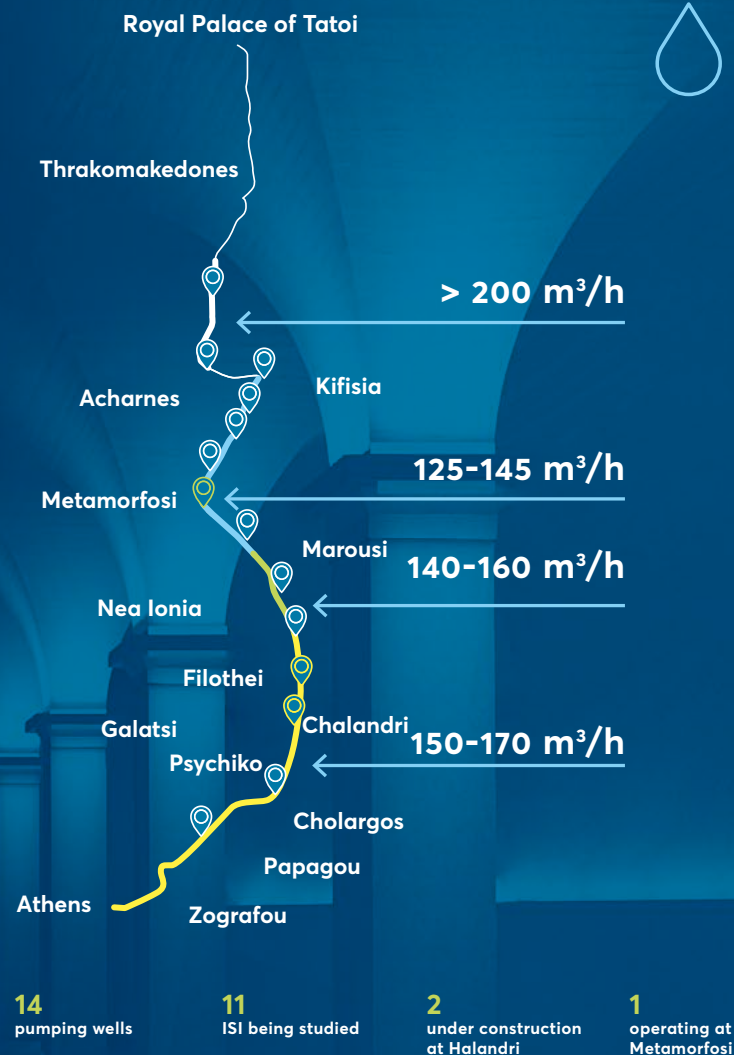
Completed in 2022: :

A.

The quantitative documentation of the Aqueduct which identified: 4 hydraulically independent basins fed by water storage, separated by total impoundments and having independent water capacities as well as multiple pumping wells along a basin, sharing its capacity.

B.

B. The preliminary study for 26.5 km of primary networks to cover **2,500 m<sup>3</sup>/day of non-drinking water** with topographic surveys in 8 municipalities. Based on the results of the study, EYDAP is planning the strategy for the overall utilization of Hadrian's Aqueduct, accelerating the design of the ISI and proceeding with the maturation of the projects with final studies.



## Connecting with the scientific community

The Company

- participated in 4 scientific conferences with speeches and posters on the quantitative and qualitative documentation of Hadrian's Aqueduct
- collaborated with the NTUA for student internships to support the exploration of Hadrian's Aqueduct

## Project implementation

"Utilization of Hadrian's Aqueduct water for the irrigation of green areas of the municipality of Chalandri"

The Tender Documents for the project were prepared and in March 2023 the tender procedure was announced for the project, which involves a 3.37 km long irrigation network for the green areas of the municipality of Chalandri.

**STAGE: CONSTRUCTION TENDER**



## ToDrinQ toolbox

The revised EU Drinking Water Directive promotes a risk assessment and risk management approach to ensure the quality of drinking water supply in the context of climate change and increased pollution.

In 2022, EYDAR, in collaboration with other European Water Companies and European Universities, started **developing and testing the ToDrinQ toolbox**.

**The ToDrinQ toolbox develops new technologies for real-time monitoring of water quality, with innovative treatment systems (suitable for small-scale, adaptable treatment plants), as well as an inter-functional decision making tool, which will act as a resource for operators and designers of Water Treatment Plants. At the end of the European project, which will be completed on 31/11/2026, a complete and innovative pilot monitoring and treatment system will be delivered to the Polydendri WWTP.**

## European Project Fiware4Water

On 31.5.2022, the European project Fiware4Water, managed by the R&D Service in cooperation with the Water Supply Directorate, the Water Supply Planning & Support Operations Directorate and NTUA, was successfully completed.

During the project, a platform based on FIWARE free software was developed which integrated data from existing and new operational sensors (level meters, water quality sensors and flow meters) installed in the external aqueduct. Lastly, FIWARE-compatible analytics and models were developed to synthesize information and support decision making with a focus on (a) optimizing water transfer from water intake sources to water treatment plants and (b) providing early warning (with 1-2 h response) in cases of increased turbidity so that treatment plants can adjust their processes accordingly.

## Monitoring and Protection of Surface Water - INTCATCH Research Programme

Following the successful completion of the European research project INTCATCH, EYDAP has at its disposal two autonomous robotic vessels enhancing the existing water quality monitoring and protection program.

**The use of the robotic vessels has shown that they can contribute to a more comprehensive and better monitoring of the quality of the reservoir, since in case of a possible pollution from anthropogenic activities or natural processes, the vessels can operate in a very short time across the entire area of the lake, locating in time the point of discharged of the pollutant.**

**For the third consecutive year, EYDAP carried out continuous monitoring of water quality characteristics in its reservoirs and produced scientific water monitoring reports.**

On 15 June 2022, on the occasion of World Environment Day, the innovative method of monitoring water quality in the surface water resource of the Marathon reservoir was carried out for the first time in Greece with the parallel use of the EYDAP's robotic vessel and MONOCLE's flying drone.



The remote-controlled robotic vessel collected data on physico-chemical parameters (chlorophyll, conductivity, pH, dissolved oxygen) from the surface of the lake while, at the same time, the flying drone recorded more than 10,000 spectrum images to measure chlorophyll and water turbidity with the special cameras it is equipped with.

**At the end of the demonstration, data was collected and important conclusions were drawn in real time, proving the very good quality status of the Marathon water body.**



MATERIAL TOPIC

## 3.2 Protection of Ecosystems

### 3.2.1 Protection of the Marine Ecosystem

Key concern of EYDAP is to preserve the good environmental status of the marine ecosystem. The Company, in the context of its activities, takes all necessary measures to ensure its protection.

## Our impacts

### WWTPs Design & Operation

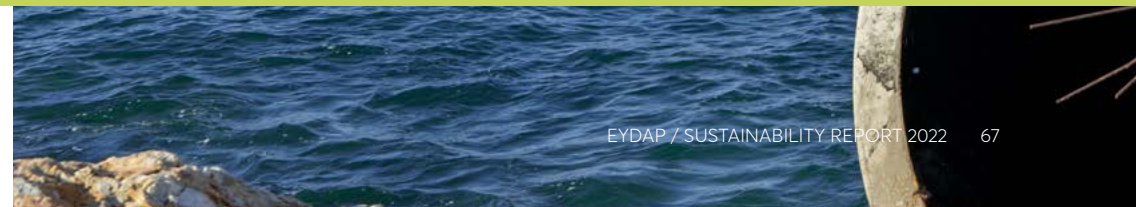
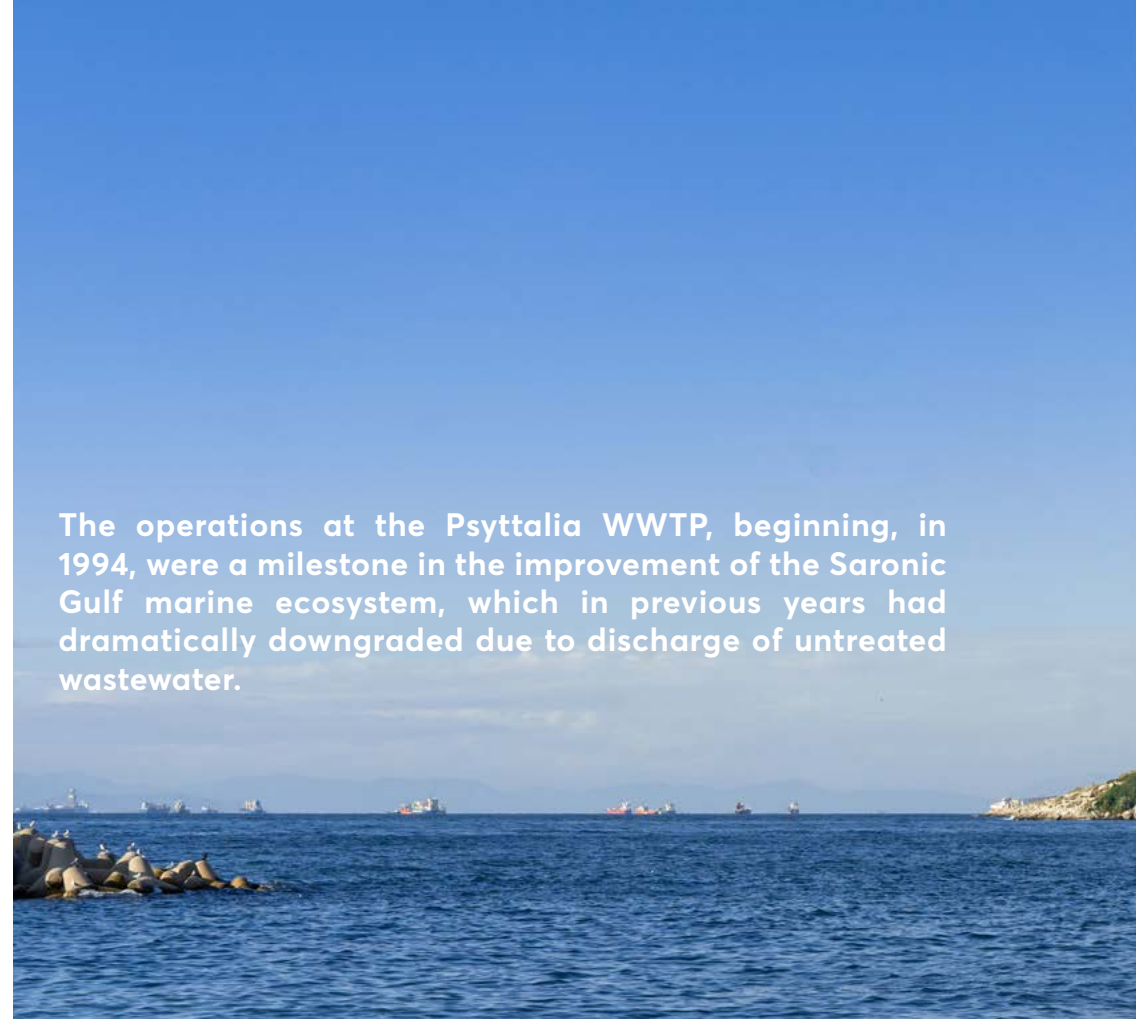
WWTPs, through the collection and treatment of urban wastewater, consist of key environmental infrastructures for the protection of marine receptors.

The treated effluent of the WWTPs discharge in the sea free of their pollutant load at a rate of approximately **95%**.

The operations at the Psytalia WWTP, beginning, in 1994, were a milestone in the improvement of the Saronic Gulf marine ecosystem, which in previous years had dramatically downgraded due to discharge of untreated wastewater.

The treated effluent from the Psytalia and Thriassio WWTPs ends up in the Saronic and Elefsina Gulfs, respectively, while effluent from the Metamorfoosi WWTP is discharged to the Saronic Gulf, through its main receiver, the Kifissos River.

EYDAP, by designing and implementing a modernization program of its facilities, not only ensures compliance with the effluent quality of the WWTPs, as required by the AEPOs (Decisions on the Approval of Environmental Conditions), but also achieves even better effluent quality.





## Synergies with Scientific Bodies and disclosure of the WWTP's Proper Functioning Outcomes to the public – HCMR

EYDAP has contracted with the Hellenic Centre for Marine Research for the systematic monitoring of the Saronic and Elefsina Gulf ecosystems, which have been identified as "sensitive receivers" and show improvement over time.

In addition, environmental monitoring is systematically carried out by competent state bodies (General Secretariat of the Natural Environment and Waters of the Ministry of Environment and Energy, Region of Attica, Blue Flag Programme).

**The quality of the coastal waters is also indicated by the fact that almost all coastal areas intended for bathing around the Saronic Gulf have been awarded a "Blue Flag".**

With regard to the effective operation of the WWTPs, analyses of treated wastewater effluent quality at the WWTPs are monitored and controlled, systematically both with on-line instruments and laboratory analyses, at intermediate stages of processing and at the discharge point. The result of laboratory analyses and are accessible to the public on the Wastewater Treatment Plant Monitoring Database maintained by the Ministry of Environment and Energy (<http://astikalimata.ypeka.gr/>).



Compliance with effluent quality limits for each parameter posted for each WWTP of EYDAP.

### Compliance with wastewater discharge quality limits 2022



2022	BOD5 Biological Oxygen Demand (5 days)	COD Chemical Oxygen Demand	TSS Total Suspended Solids	T-N Total Nitrogen	T-P Total Phosphorus
Psytalia WWTP	✓	✓	✓	✓	_*
Metamorfosi WWTP	✓	✓	✓	_*	_*
Thriassio WWTP	✓	✓	✓	✓	✓

\*Not subject to designation under Directive 91/271/EEC

**During the reporting period, the Company has not identified any non-compliance with environmental laws and/or regulations.**

**However, it is clarified that the status of the water receptors, also, depends on other factors, which are not within the scope of the EYDAP's responsibilities**





## 3.2.2 Protection of Biodiversity



The basic parameter in the sustainable management of water resources is the preservation of biodiversity. Through the management of the water cycle, EYDAP protects the aquatic ecosystems in the areas in which it exercises its activities.

### Our impacts

Due to the fact that human activities are strictly regulated, lakes are developing into significant wetland ecosystems which support protected avifauna species, interesting fish fauna and unique lakeside vegetation.

**The basic role of EYDAP reservoirs is to store high-quality water for the capital's water supply, however they also constitute significant wetlands:**



**Natural lake of Yliki**

Source of water abstraction for the Water Supply System of Attica, forms part of the Natura 2000 network of protected areas.



**Artificial lake of Marathon**

The first reservoir of the Attica water supply system and a significant wetland.



**Mornos Reservoir**

Are important wetland ecosystems.



**Evinos Reservoir**



## Water for the ecosystem - "ecological flow"

To maintain the continuity of wetland ecosystems, EYDAP investigated the possibility of maintaining "ecological flow", to the river ecosystems downstream of the dams. Maintaining this minimum required flow is necessary according to legislation, environmental terms and contemporary international trends in environmental reservoir management.

**EYDAP SA implemented a Technical Environmental Study for the Mornos and Marathon dam.**

### Marathon Dam

According to the Technical Environmental Study for the Marathon Dam, it was estimated that a flow rate of 25 l/sec downstream of the dam is required to achieve the above mentioned purpose, which was implemented.

### Mornos Dam

The river ecosystem downstream of the Mornos dam is in good condition due to the constant flow of surface water over the river bed.

EYDAP has completed the systematic monitoring of the ecological and chemical condition of the river ecosystem by implementing a three-year hydromorphological, physicochemical, biological and chemical measurement programme, in accordance with the specifications of Water Framework Directive 2000/60/EC and the YD04 Water Management Plan set out in the Technical and Environmental Study of the Mornos Dam. The above monitoring indicated that the river ecosystem downstream of the Mornos dam is in good ecological and chemical condition.

### Evinos River

An "ecological flow" of 1m<sup>3</sup>/sec has been estimated for the Evinos river, which is the newest reservoir. Consequently, the riparian ecosystems downstream of the dam maintain their physiognomy and their significant biodiversity.

## East Attika Project - Ecosystem upgrading

**The collection and treatment of urban wastewater from the settlements of East Attika is an environmental infrastructure project that protects the surface and coastal water ecosystems.**

The implementation of the urban waste water collection and treatment projects, which are currently discharged untreated into receiving waters, has been shown to contribute to the protection of the ecosystems of Attika.

Particularly in areas of protected wetlands of Natura 2000 sites such as the Schinias National Park, Special Ecological Assessment (SEA) studies are carried out in the context of the Environmental Impact Studies of the sewerage projects, with the aim of maintaining the ecological integrity of the areas and achieving the protection objectives (SSCO) of their species and habitats.

The operation of the projects is expected to protect the marine environment, water quality and beaches.

EYDAP has commissioned the Hellenic Centre for Marine Research (HCMR) to monitor the marine ecosystem of the South Evian Gulf in order to document its current status.

Following the completion of the documentation of the current status, HCMR will continue to monitor the marine ecosystem also during the operation of the new Wastewater Treatment Centres (WWTPs) and the upgrading of the ecosystem due to the good functioning of the environmental infrastructure.



## MATERIAL TOPIC

### 3.3 Climate Change Adaptation

Dealing with climate change is one of the great modern challenges for EYDAP. Seeking to respond to the challenges of prevention and precaution arising from the risks of climate change (increased temperatures, increased number of droughts, severe weather phenomena) with effects in a wide range of sectors, the Company applies specific principles to its projects, such as:

**The pursuit of climate neutrality is a priority for the company. In this direction, EYDAP has indicators that measure the progress of net - zero projects.**



**Estimation of the air pollutants emissions that have direct effects on climate change (greenhouse effect), in new studies.**



**Formulating a strategy to improve energy efficiency and reduce the carbon footprint.**



**Energy saving - minimisation of CO2 emissions.**



**Selection of materials and machines with modern environmental specifications**



**RES: PV Stations & hydroelectric projects in facilities.**



**Implementation of Studies for the protection of new infrastructure from extreme phenomena, as a result of the average temperature increase.**

## 3.3.1 Emissions

### Annual emissions and their sources

The infrastructure of EYDAP includes:



4

#### Water Treatment Plants

Acharnai WTP  
Galatsi WTP  
Aspropyrgos WTP  
Polydendri WTP



3

#### Wastewater Treatment Plants

Psytalia WWTP  
Metamorphosis WWTP  
Thriasio WWTP



#### The Water Supply Network



#### The Sewerage Network



#### Mavrosouvala boreholes



#### Small Hydroelectric Power Stations (SHPS) along the length of the External Aqueduct System



#### Thivai Regional Control Center & its 4 associated pumping stations



#### Buildings both owned and rented **Fleet** of privately owned vehicles and machinery







**EYDAP SA, under the current Contract, is responsible for the operation and maintenance of the External Aqueduct System on behalf of “EYDAP fixed Assets NPDD”.**

EYDAP Fixed Assets Company owns the dams, reservoirs, external aqueducts and pumping stations as well as other facilities that ensure the secure transport of the water until it enters the EYDAP facilities, where it is processed for conversion into drinking water

*Reference to chapter 1 of this Report.* ➔

In May 2023, EYDAP, in order to better depict the carbon footprint data, changed the calculation boundaries and recalculated SCOPE 1, 2, 3 by classifying the processes that take place within the External Aqueduct System as indirect emissions of EYDAP SA (Scope 3), thus recording a deviation from the published data in the Annual Report 2022.

Given the above, the reference year for the calculation of the carbon footprint of EYDAP SA is 2022.

**The gases that have been measured are:** a) carbon dioxide (CO<sub>2</sub>), b) methane (CH<sub>4</sub>) and c) nitrous oxide (N<sub>2</sub>O), which are the main greenhouse gases and account for most of the emissions produced.

The other measurable greenhouse gases listed in the Kyoto Protocol are not recorded, because according to the initial carbon footprint reports (years 2019-2020), they represent a very small percentage based on the Company's field of activity.

The values used for the Global Warming Potentials (GWP) for carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) are 1, 28 and 265 respectively (IPCC Fifth Assessment Report (AR5)).

The **methodology** followed for the calculation of the carbon footprint of EIA is based on:

1. ISO 14064-1:2018 Greenhouse gases - Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals.
2. Greenhouse Gas Protocol, WRI (GHG Protocol Corporate Accounting and Reporting Standard, Revised Edition).





## Inclusion of the Psyttalia Wastewater Treatment Plant, since 2014, in the greenhouse gas emission allowance trading scheme (EU-ETS)

According to the legislation, the wastewater treatment facility, the Psyttalia Wastewater Treatment Plant, was included in the above mentioned system, in 2014.

Every year, reports are prepared and verified by an independent certified body and submitted to the competent National Authority (Ministry of Environment and Energy) and to the relevant EU Registry. The difference in regulated emissions through the EU-ETS (non-biogenic) carbon dioxide emissions compared to the reference year 2014, has decreased by 4,225 tn in 2022.

### In 2022, CO<sub>2</sub> emissions showed

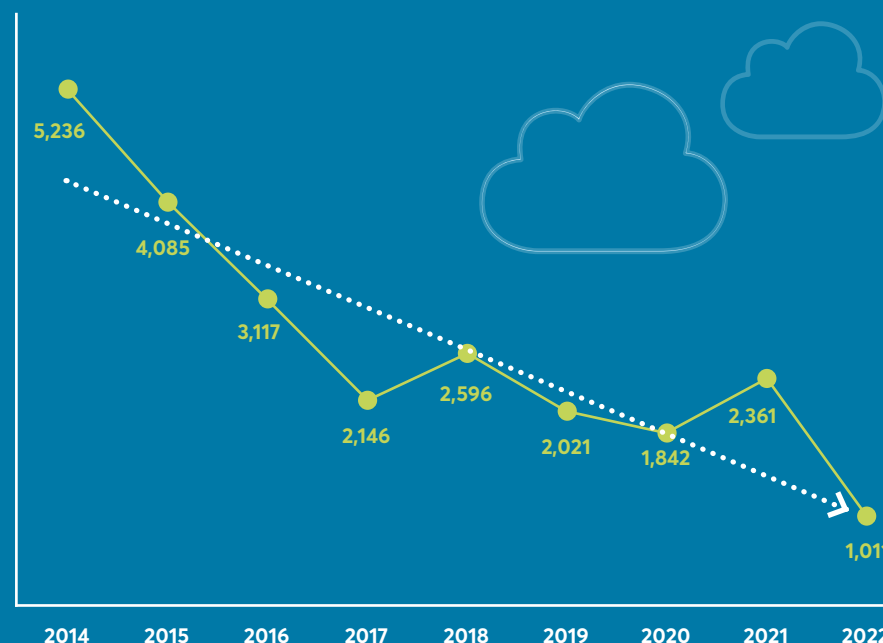
↓  
**57% decrease**  
compared to the  
corresponding value in 2021

↓  
**50% decrease**  
compared to the  
corresponding value in 2019

↓  
**45% decrease**  
compared to the  
corresponding value in 2020

↓  
**80% decrease**  
compared to the  
corresponding value in 2014

### Annual CO<sub>2</sub> emissions at Psyttalia WWTP (tn)



The significant reduction in CO<sub>2</sub> emissions in Psyttalia WWTP is due to a series of targeted management options. More specifically:

- Natural gas use reduction and its substitution with biogenic biogas produced at the plant from the treatment of sludge
- Projects implementation for the increase of biogas production
- Installation of an integrated automatic power and energy management system, which allows the most rational management of energy resources.

## Annual CO<sub>2</sub>e equivalent emissions of EYDAP

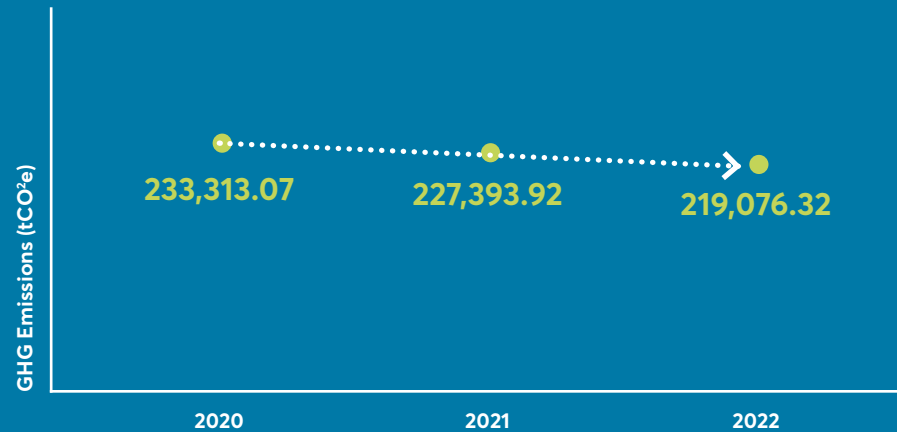
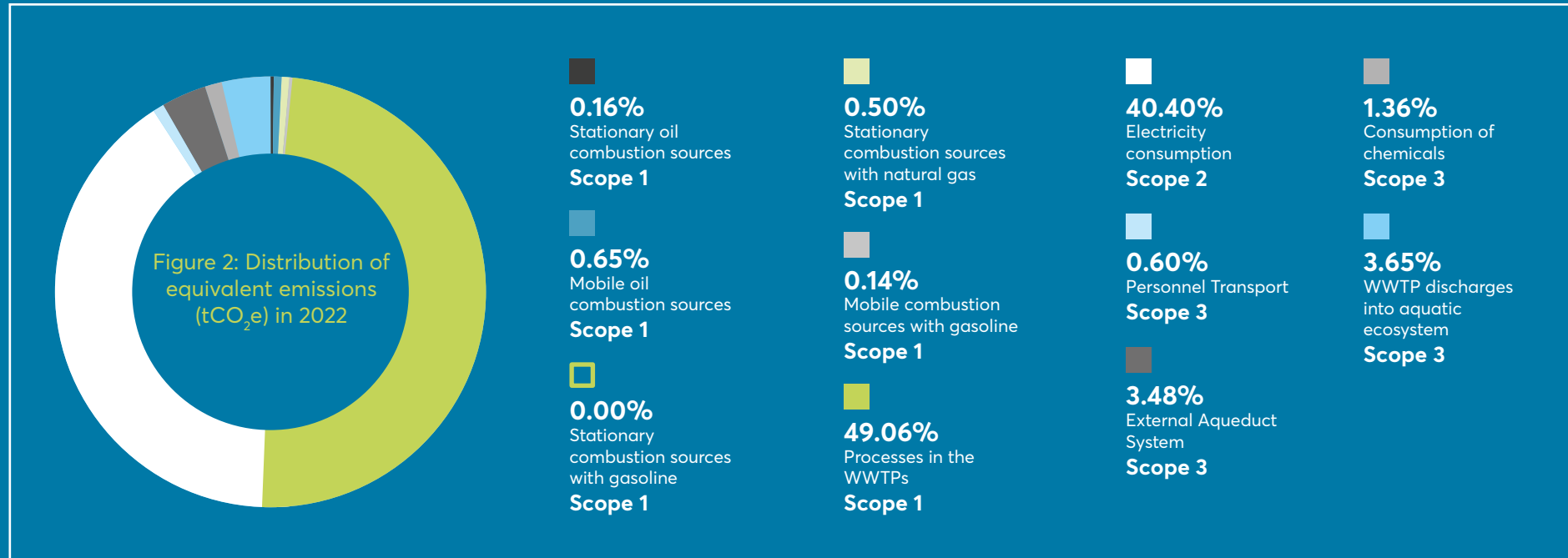
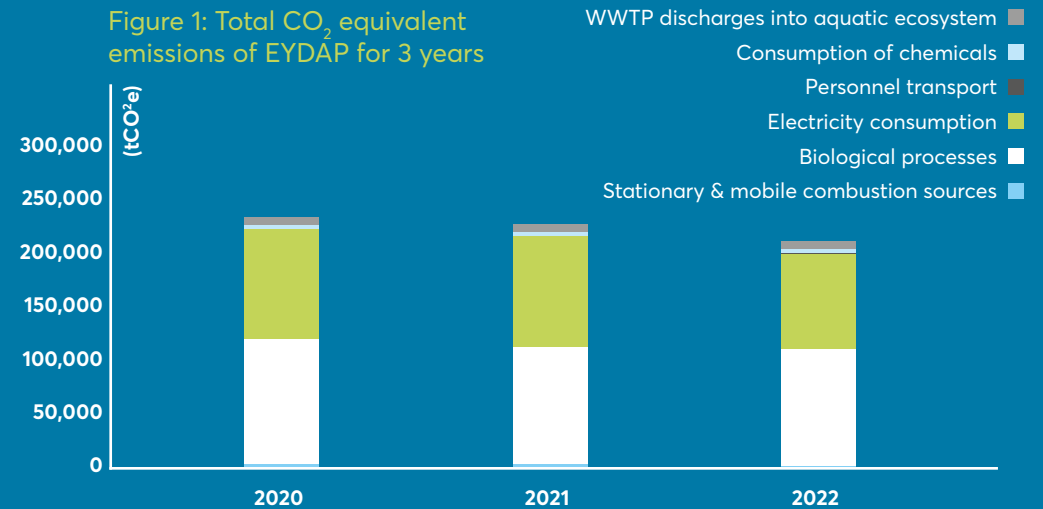


Figure 1: Total CO<sub>2</sub> equivalent emissions of EYDAP for 3 years





From the processing of the data and the calculation of the carbon footprint of the year 2022 for EYDAP, the following results are obtained:

### SCOPE 1 (Category 1):

The equivalent emissions corresponding to SCOPE 1 in 2022 amount to **110,660.30 tCO<sub>2</sub>e**.

The processes taking place in the Wastewater Treatment Plants (WWTPs) in EYDAP have the largest contribution to GHGs emissions (107,488.89 tCO<sub>2</sub>e) which are direct emissions.

#### Other emissions included in SCOPE 1

<b>1,099.72 tCO<sub>2</sub>e</b> Stationary combustion sources with natural gas	<b>344.55 tCO<sub>2</sub>e</b> Stationary oil combustion sources	<b>2.44 tCO<sub>2</sub>e</b> Stationary combustion sources with gasoline
<b>1,426.27 tCO<sub>2</sub>e</b> Mobile oil combustion sources	<b>298.43 tCO<sub>2</sub>e</b> Mobile combustion sources with gasoline	

### SCOPE 2 (Category 2):

The equivalent emissions corresponding to SCOPE 2 in 2022 amount to **88,503.84 tCO<sub>2</sub>e**.

The electricity consumption of all EYDAP facilities is the second most important source of emissions in EYDAP.

**The largest indirect GHG emissions due to electricity consumption are observed:**

<b>38,345.06 tCO<sub>2</sub>e</b> emissions from the Psytalia WWTP	<b>28,719.64 tCO<sub>2</sub>e</b> emissions from the Water Supply Network
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#### **63.038 kg CO<sub>2</sub>/m<sup>2</sup> of building surface area**

The carbon dioxide emission index for the EYDAP buildings, most of which belongs to SCOPE 2 (electricity).

**The lowest emission indicator per m<sup>3</sup> of water among the total water treatment emission indicators, is displayed at the Galatsi WTP (0.008 kgCO<sub>2</sub>/m<sup>3</sup>) and the highest at the Polydendri WTP (0.021 kgCO<sub>2</sub>/m<sup>3</sup>)**

due to the pumping requirements to raise the level of undiluted water.

### SCOPE 3 (Categories 3 & 4):

The equivalent emissions corresponding to SCOPE 3 in 2022 amount to **19,912.18 tCO<sub>2</sub>e**.

#### SCOPE 3 includes:

<b>7,997.83 tCO<sub>2</sub>e</b> The disposal of effluents from the WWTPs to the aquatic ecosystem	<b>7,619.22 tCO<sub>2</sub>e</b> Electricity consumption in the External Aqueduct System.	<b>2,969.87 tCO<sub>2</sub>e</b> The use of chemicals
<b>1,325.26 tCO<sub>2</sub>e</b> Employee transport.		

The questionnaire was answered by 453 employees (~¼ of the company's employees). The responses were extrapolated to the total number of company employees and the emissions amount to.

#### Indirect emissions from employee transport/ Breakdown by emission source

Emissions Source	CO <sub>2</sub> (t)	CH <sub>4</sub> (t)	N <sub>2</sub> O (t)	CO <sub>2</sub> e (t)
<b>A. Cars</b>	975.4	0.002	0.003	976.3
<b>B. Two wheelers</b>	121.9	0.002	0.001	122.1
<b>C. Taxi</b>	17.0	0.0	0.0	17.1
<b>D. Underground/Tram</b>	20.5	0.0	0.0	20.5
<b>E. Bus</b>	189.1	0.0	0.0	189.2
<b>Total Emissions</b>	<b>1,324.0</b>	<b>0.004</b>	<b>0.004</b>	<b>1,325.3</b>

## Total CO2 equivalent emissions by SCOPE – Category

Scope	Category	tCO <sub>2</sub> e
<b>Scope 1</b>	Category 1 - Direct Emissions	110,660.30
<b>Scope 2</b>	Category 2 - Indirect Emissions	88,503.84
<b>Scope 3</b>	Category 3 - Indirect Emissions from personnel transport	1,325.26
	Category 3 – Indirect Emissions from External Aqueduct System	7,619.22
	Category 4 - Indirect Emissions	10,967.70

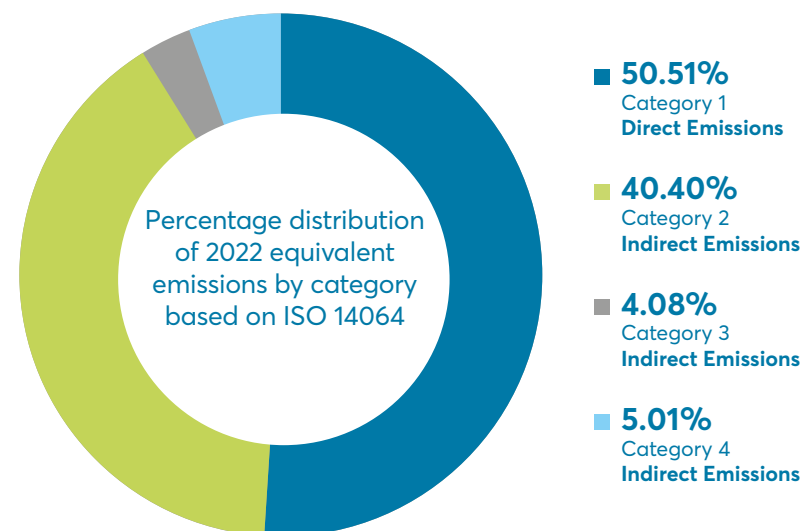
## GHG emissions intensity by scope:

GHG emissions intensity **scope 1**:  
**110,660.30 / 343.5 = 322.16 (tco<sub>2</sub>e /million €)**

GHG emissions intensity **scope 2**:  
**88,503.84 / 343.5 =257.65 tco<sub>2</sub>e /million €)**

GHG emissions intensity **scope 3**:  
**19,912.18 / 343.5= 57.97 (tco<sub>2</sub>e /million €)**

GHG emissions intensity per cubic meter:  
**219,076.32 / 308,077,697** (December Statistical Bulletin)  
 Tariffed cubic meters for 2022 = 0.00071 (tCO<sub>2</sub>e /m<sup>3</sup>)



The Climate Law 4936/2022 (Government Gazette 105/A '/27-5-2022) defines the institutional framework for the gradual reduction of anthropogenic greenhouse gas emissions with the aim of achieving climate neutrality in 2050 and adaptation to climate change. Essentially, this is the Road Map that the country will adopt in order to achieve the goal of climate neutrality by 2050.

Since 2022, EYDAP has been obliged to submit its carbon footprint report on a platform of the Ministry of Environment and Energy.







## MATERIAL TOPIC

### 3.3.2 Energy

At a time of intense economic and geopolitical crisis, the cost of energy as a key regulator of industrial processes has created an unfavorable cost condition along the supply chain, with an impact on environmental and economic sustainability.

The current energy crisis and its associated risks require a holistic approach to the issue. In order to further strengthen the corporate resilience against further shocks but also with a view to its environmental footprint, EYDAP has designed and is following a specific Corporate Strategy:

- **Adherence to operational and quality standards**
- **Utilisation of technology and innovation to ensure that all stages of water & wastewater treatment have maximum efficiency in this way,**

contributing to the achievement of the national objective of increasing the production of energy from Renewable Energy Sources.



## EYDAP Key Units of Renewable Energy Sources

In the context of optimising its energy balance and the utilisation of renewable energy sources, EYDAP has developed:

### 1. Photovoltaic Station Of Acharnai

at EYDAP premises in the Municipality of Acharnai. It was put into operation on 03/10/2019, in order for EYDAP **to sell** the electricity produced.

**1.9712 MW Power**

**3,280,226 kWh**  
energy production in 2022

**on the same level as it was in 2021.**





## 2. Small Hydroelectric Power Stations (SHPSs)

Along the external aqueducts (External Aqueduct System) that transfer water from the reservoirs to the refineries, small hydroelectric plants operate, which are owned by EYDAP and whose energy is sold from EYDAP and compensated by the Renewable Energy Sources Operator & Guarantees of Origin (DAPEEP SA). The water from the aqueducts is diverted to a side canal, where, with the operation of a hydro turbine, the hydraulic energy is converted into mechanical energy and then, through a generator, into electrical energy.

The water is then reintroduced into the main aqueduct, where it continues to flow.

The operating SHPSs:

### Elikonas SHPS

650 kW power and a projected annual energy production of

**5,000,000 kWh**

### Evinos SHPS

820 kW power and a projected annual energy production of

**4,000,000 kWh**

### Kithairon SHPS

1200 kW power and an estimated annual energy production of

**5,730,000 kWh**

### Kirfi SHPS

760 kW power and a projected annual energy production of

**5,860,000 kWh**

### Mandra SHPS

630 kW power and a projected annual energy production of

**4,900,000 kWh**

# 18,972,099 kWh

total energy production from the SHPSs



approximately higher by 8%  
compared to the value of 2021 (17,515,903 kWh)

The energy produced by the SHPSs is totally dependent on the range of the PPC (Public Power Corporation) grid instabilities, as well as on the weather conditions and the resulting failures of the electromechanical equipment of the plants.



Kirfi SHPS

### 3. Small hydroelectric power station in the Psyttalia WWTP

In Psyttalia, there is a small hydroelectric plant installed in the outflow pipeline, operating since 2015.

**2,180,239 kWh**  
electricity self-generation in 2022 which is consumed on-site by the company.

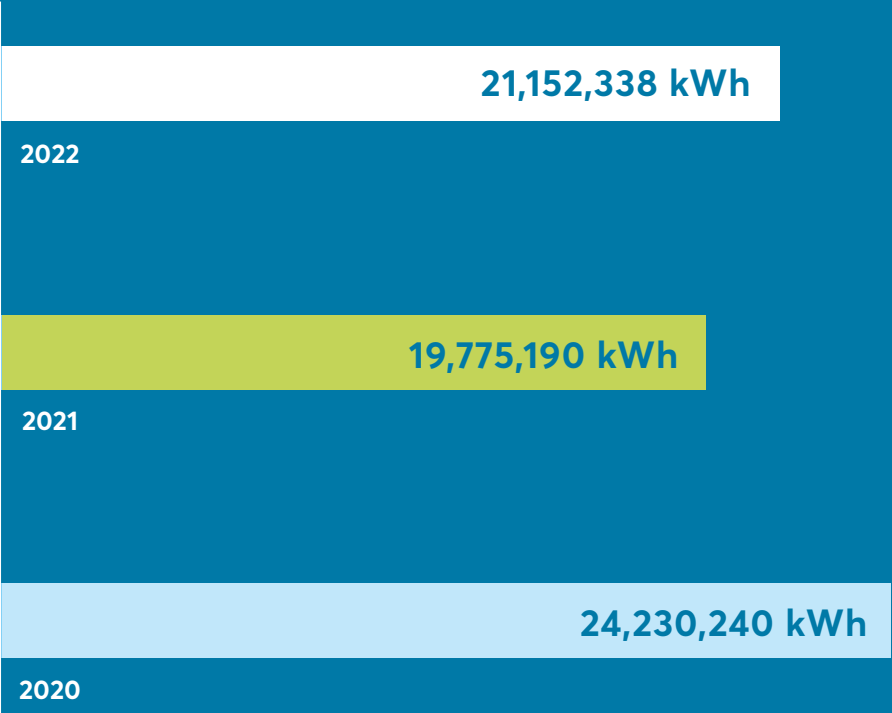
**2021** 2,259,287 kWh

The variation of the electricity production from this plant in the outflow of the Psyttalia WWTP is due to the annual variation of the wastewater flow rate.



#### Total annual energy production

Total annual energy production of the 5 SHPSs and the hydroelectric power plant of the Psyttalia WWTP outflow.



## 4. Biogas

The biogas produced in the digesters of the Psyttalia WWTP is used as fuel:

- In the thermal drying unit of the dehydrated sludge
- In the boiler room of the digestion unit for heating the sludge
- In the steam generating unit for steam production (for the thermal hydrolysis unit of the sludge).
- In internal combustion engines for combined heat and power generation (CHP)
- In regenerative thermal oxidizers (RTO) for the treatment of exhaust gas from the drying plant



### 97,200 MWh

Recovered thermal energy  
of the Psyttalia WWTP biogas in 2022

### 2,810 MWh

Recovered thermal energy  
of the Metamorphosis WWTP biogas in 2022

### 22,514 MWh

Electricity produced from  
biogas at the Psyttalia WWTP

At the Metamorphosis WWTP, the digester biogas is currently used only as thermal energy, but the installation of a combined heat and power (CHP) generation plant is planned, in order to enable full use of the biogas produced.

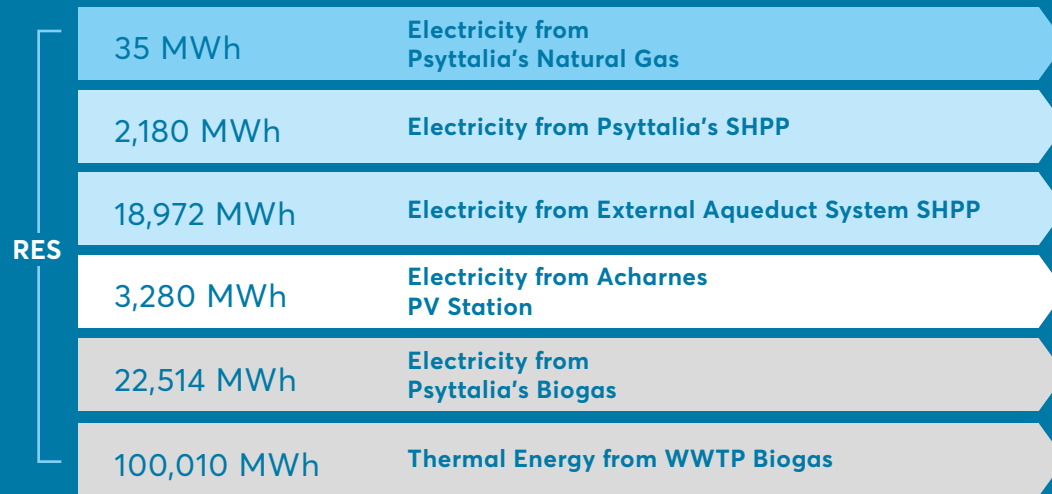






## Energy Balance

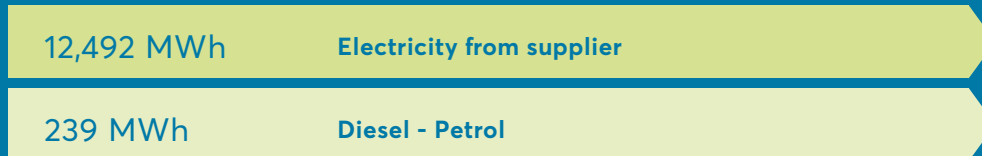
### Energy Production by EYDAP S.A.



### Energy purchased EYDAP S.A.



### Energy purchased (External Aqueduct System Operations)



### RES energy sold by EYDAP S.A.



### EYDAP S.A. Indicators

RES contribution to electricity consumption [(b-a)/g]  
14.44 %

RES total contribution to total consumption [h/j]  
43.7 %

Total RES production as a percentage of total consumption [d/j]  
51.5 %

Percentage of electricity purchased  
85.54 %

Electricity as a percentage of total consumption [g/j]  
59.95 %

(b) 46,946 MWh Total electricity production from RES by EYDAP S.A.

(c) 46,981 MWh Total electricity production by EYDAP S.A.

(d) 146,956 MWh Total RES production by EYDAP S.A.

(e) 146,991 MWh Total energy production by EYDAP S.A.

(f) 160,604 MWh Total energy purchased (EYDAP S.A.)

(g) 171,061 MWh Electricity consumption by EYDAP S.A.

(h) 124,704 MWh Total energy consumption from RES by EYDAP S.A.

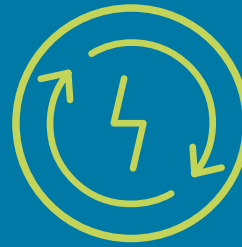
(i) 185,333 MWh Total electricity, diesel, petrol and natural gas consumption by EYDAP S.A.

(j) 285,343 MWh Total energy consumption by EYDAP S.A.

#### Assumptions:

- 1) The Raw Water Intake Division is part of the external aqueduct
- 2) 35 vehicles of EYDAP S.A. serve the needs of the external aqueduct and are not included in the energy balance of EYDAP S.A.
- 3) The energy consumption of the Mavrosouvalas pumping station, the Kiourka pumping station and the Boeotia speed refineries is claimed by EYDAP S.A.

In 2022, EYDAP S.A. displays the following key energy indicators values in its facilities:  
(as described in the section 3.3.1)



**1.**  
**285,343.16 MWh**  
**(1,027.235 TJ)**  
Energy consumption within the organisation

**2.**  
**146,332.26 MWh**  
Electricity purchased for consumption

**3.**  
**146,956.56 MWh**  
Total energy produced from RES

**51.28%**  
Percentage of electricity consumed  
{[2]/[1]}

**4.**  
**124,704.24 MWh\***  
**(448.935 TJ)**  
Total energy consumption originated from RES

**5.**  
**146,991.38 MWh**  
Total energy production

**6.**  
**107,069.69 MWh**  
Total energy consumption for heat

**43.7%**  
Percentage of electricity consumed and originates from RES  
{[4]/[1]}

**7.**  
**Total energy consumption for cooling**  
Energy consumption for cooling is included in the electricity purchased for consumption. However, no related data is available on the total breakdown.

**8.**  
**22,252.33 MWh**  
Total sale of energy produced

**9.**  
**160,877.82 MWh**  
**(579.160 TJ)**  
Consumption of energy from non-renewable sources

**99.98%**  
Percentage of electricity produced from RES {[3]/[5]}

\* The total self-consumption of energy produced from RES amounts to 124,704.24 MWh and is derived from the SHPP at the exit of the Psytalia WWTP and from the combustion of the biogas produced in the CHP of the Psytalia WWTP. Specifically, the quantity consumed on-site from the Psytalia WWTP amounts to 2,180.24 MWh and the quantity consumed from the combustion of the biogas produced in the CHP of Psytalia WWTP amounts to 122,524.00 MWh (Electricity on-site consumption from CHP: 22,514.00 MWh + Thermal energy on-site consumption from CHP: 100,010.00 MWh).

In 2022, the **External Aqueduct System** (from reservoirs to the intake of the WTPs) displays the following values in the key energy indicators:

**10.**  
**12,731.27 MWh**  
**(45.833 TJ)**  
Energy consumption of the External Aqueduct System

**11.**  
**12,492.38 MWh**  
Total electricity purchased for consumption

**98.12%**  
Percentage of electricity consumed {[11]/[10]}

Cumulatively, in 2022, the following values in the main energy indicators are displayed:



**a.**

**298,074.43 MWh  
(1,073.068 TJ)**

Total energy consumption within the organisation

**b.**

**158,824.63 MWh**

Total electricity purchased for consumption

**c.**

**146,956.56 MWh**

Total energy produced from RES

**d.**

**124,704.24 MWh\*  
(448.935 TJ)**

Total energy consumption from RES

**e.**

**146,991.38 MWh**

Total energy production

**f.**

**107,069.69 MWh**

Total energy consumption for heat

**g.**

**Total energy consumption for cooling**

No such record exists

**h.**

**22,252.33 MWh**

Total sale of produced energy

**i.**

**173,370.20 MWh  
(624.133 TJ)**

Total consumption of energy from non-renewable energy sources

\* The total self- consumption of energy produced from RES amounts to 124,704.24 MWh and is derived from the SHPP at the exit of the Psytalia WWTP and from the combustion of the biogas produced in the CHP of the Psytalia WWTP. Specifically, the quantity consumed from the SHPS of the Psytalia WWTP amounts to 2,180.24 MWh and the quantity consumed from the combustion of the biogas produced in the CHP of the Psytalia WWTP amounts to 122,524.00 MWh (Amount of electricity from CHP consumed on-site: 22,514.00 MWh + Thermal energy from CHP consumed on-site: 100,010.00 MWh).

**53.28%**  
Percentage of electricity consumed  
 $\{[b]/[a]\}$

**41.84%**  
Percentage of energy from RES consumed  
 $\{[d]/[a]\}$

**99.98%**  
Percentage of energy produced from RES  
 $\{[c]/[e]\}$

## Energy Intensity of EYDAP SA

Electricity consumption for the production and distribution of water per invoiced m<sup>3</sup>

**0.00019 (MWh/m<sup>3</sup>)**  
59,285.47 / 308,077,697  
(December Statistical Bulletin)

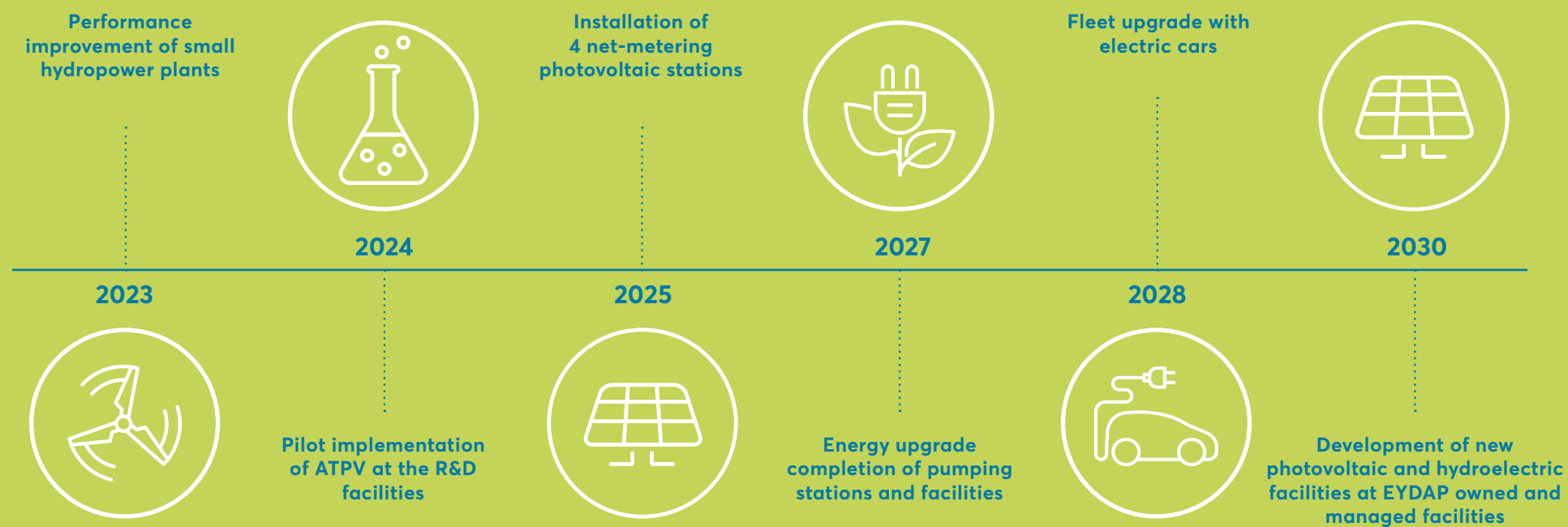
Electricity consumption for wastewater treatment & wastewater transfer / Billed consumption

**0.00027 (MWh/m<sup>3</sup>)**  
83,721.92 / 308,077,697  
(December Statistical bulletin)



### 3.3.3 Climate Change Mitigation Strategies

#### Road map to Net Zero





## Actions aiming to decrease carbon & energy footprint

**The Company, with environmental responsibility, is integrating transformation actions in its operations, aiming to reduce its carbon footprint (Net Zero).**

The Strategy for improving energy efficiency and reducing the carbon footprint by 2030 was drawn up through the energy upgrade of energy-intensive facilities, the implementation of renewable energy projects, the construction of the new bioclimatic building and electrification.

- **1.** In April 2022, the new 5-year operation and maintenance contract of the Psyttalia WWTP started, which provides for each contract year a specific percentage of guaranteed energy optimization (through the execution of works related to the supply and installation of new equipment and operational adjustments on existing and planned new facilities and equipment units).

**Overall, in the 5<sup>th</sup> contract year, an overall reduction of 34.78% (at a minimum) in the energy consumption of Psyttalia WWTP is foreseen, with a consequent reduction in greenhouse gas emissions and carbon footprint.**

- **2.** Projects aiming at further energy utilisation **energy utilisation** of the biogas produced at the **Metamorphosis WWTP**, with the installation of a combined heat and power (CHP) unit
- **3.** The **Polydendri WTP** has a nominal refining capacity of 200,000 m<sup>3</sup>/d. The two pumping stations for untreated and refined water were built in 1970 and have been continuously operating since then with the same pumping units with very low efficiency, resulting in high energy consumption. In the context of reducing energy consumption and ensuring the safety of the operation of the water supply system for the uninterrupted water supply of the capital city, **a project design has been completed to upgrade the energy efficiency of the two pumping stations** by constructing new pumping stations.

Specifically, the project includes:

- The replacement of pumps with new modern high-efficiency pumps and low-loss motors
- Construction of a new refined water pumping station building
- replacement of Medium Voltage Substations with very low loss substations in accordance with the latest EU directive
- Installation of a modern distribution network and motor control systems
- Installation of a reserve power generation system which will ensure the uninterrupted operation of the WTP at its maximum refining capacity

- Replacement of the existing external fire extinguishing network with refined water, with a new undiluted water pumping station
- Automatic control system for the operation of the pumping station with installation of a new SCADA.

In 2022, the preliminary design of the project was approved and the bidding process was initiated and is scheduled to start in the 2nd quarter of 2023.

- **4. Completion of the energy efficiency audit of the Water Supply and Sewerage networks pumping stations** and inclusion of additional calibration in the planning by placing metering devices in selected locations, aiming at the energy rationalization of their operation.

**Total estimated savings after energy upgrading of the pumping stations until 2028**

Water supply: 7.7 GWh /year

Sewerage : 3 GWh /year

**Total : 10.7 GWh /year**

- **5. Preparation of reconnaissance studies to identify any escaped hydrodynamics for utilization at the locations of the Hydroelectric projects located along the Mornos waterway, as well as to identify the possibility of installing new PV Plants at the EYDAP facilities.**

Total estimated increase in RES generation from the rationalisation/upgrade of all existing SHPSs (Kirfi, Elikonas, Kithaironas and Mandra): **17 GWh / year**

Estimated energy generation from the development of new PV on EYDAP owned sites: **41.5 GWh / year**



→ **6. The design of 4 PV Plants with a total capacity of 3.5 MW** was completed through the energy offsetting procedure and the tender process for 2 of the 4 PV plants of 1.99 MW in Acharnai and Polydendri was completed, which will save money for the Company due to decrease in electricity supply

→ **7. A gradual transition to electrification** with the approval of the replacement of 53 vehicles and 16 two-wheelers with electric vehicles and the installation of the network for their charging.

Total estimated carbon footprint reduction:

**1,392 tCO<sub>2</sub>e** by 2028

(if cars are charged by existing facilities).

→ **8. Procurement of innovative material to improve pollutant emissions of existing owned fleet of vehicles/machinery of EYDAP.**

Pilot application of an innovative material, the Environmental Fuel Additive, which is derived from the fossil fuel technology sector, to reduce the carbon footprint from internal combustion engines.

The use of the Environmental Fuel Additive reduces:

- Drastically the Black Carbon (PM, CO, HC), i.e. the second largest anthropogenic contributor to Climate Change which bears 2/3 of the climate impact of CO<sub>2</sub>. It also reduces the consumption of liquid fossil fuels and, to the same extent, the emissions of carbon dioxide (CO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) and
- The fuel consumption, resulting in a further percentage reduction in pollutant values, including CO<sub>2</sub> (Carbon Dioxide) and NO<sub>x</sub> (Nitrogen Oxides), without increasing the concentration (ppm) in the volume of residual combustion products and without creating new ones.

Through the outcome of the pilot application, it was found:

- Improvement in pollutants
- Reduction in fuel and exhaust emissions
- Decrease in operational costs

At the beginning of 2022, the extension of its use to all petrol stations and all vehicles and machinery of EYDAP was approved.

→ **9. Optimization of TRANSPORT management** including its leased vehicles and machinery: The project started in 2021 and concerns

- Redesign of the Target Operating Model- TOM of the Transport Services
- Development of Fleet Management specifications
- Strategic Allocation Design of Transport Services Requirements

In 2022, the needs for the renewal of the company's owned fleet and the lease of electric vehicles were updated, and the process of drafting technical specifications for environmentally friendly (low emission or electric) vehicles was initiated.

→ **10. The tendering process for "Supply of electricity to the EYDAP facilities",** with an estimated annual consumption of 165,400.00 MWh has been completed and the submission of tenders and the selection of a final contractor is expected within 2023.

→ **11. Estimation of emissions of air pollutants** that have a direct impact on climate change (greenhouse effect) in new studies.

→ **12. Selection of materials and machinery** with modern environmental standards.

→ **13. Studies to protect new infrastructure** from extreme phenomena, such as flooding, as a result of the increase in average atmospheric temperature, to counteract the negative effects of climate change

→ **14. Completion of the Architectural Ideas Competition** for the construction of a **New Bioclimatic Building** to save energy and resources and reduce the company's carbon footprint



→ **15.** The installation of **low consumption street lighting lamps** in eight outdoor areas of EYDAP was completed (Acharnai WTP, Galatsi WTP, Polydendri WTP, Aspropyrgos WTP, Metamorphosis WWTP, Psyttaleia WWTP, Thriasio WWTP, around Marathon Lake).

→ **16. Energy upgrading of existing buildings** by replacing conventional lighting with energy-saving lamps.

→ **17.** EYDAP, in order to contribute as much as possible to the reduction of its energy and carbon footprint, participates in the **European research programme TRINEFLEX** in direct cooperation with 28 other partners. The project started in November 2022 and with the integrated toolkit it is developing, it is expected to contribute to a more flexible and sustainable operation of industrial plants until August 2026 when it ends. EYDAP's participation in the TRINEFLEX project primarily involves the optimisation of the energy consumption of the most energy-intensive processes in a WWTP, using digital tools, as well as the application of conventional and/or innovative energy production technologies.

The aim is to improve the energy efficiency of the selected processes by >7%, energy costs by >12% and emissions by >20%.

→ **18. BLUE MARBLE programme:**

**At KEREFTY,** there is a pioneering combined heat and power plant making it one of the first buildings of EYDAP with almost zero consumption.

The installed thermo-voltaic panels (ATPV System) with a self-generation capacity of 72.8 MWh, with the parallel replacement of the old LED lamps and the rehabilitation of the obsolete fan-coil systems, will provide the KEREFTY facility with full energy coverage, achieving, in parallel with the Net-Metering method, the net-zero targets and **making KEREFTY one of the first EYDAP buildings with zero air pollutants.**

The energy upgrade of KEREFTY started in December 2022 and is expected to be completed and delivered before June 2023.





## 3.4 Circular Economy

Utilising material and natural resources throughout their life cycle is an important business approach towards the circular economy and a response to our commitment to environmental protection and to mitigate the impacts of climate change.

The continuous reduction of the amount of waste that needs to be disposed of at the end of a product's life cycle contributes significantly to minimising its impact on the environment and human health.

**Non-application of the principles of the circular economy carries risks for the Company, such as non-compliance with the regulatory framework, with all the legal consequences that implies, reputational damage, lack of trust of our customers, as well as substantial financial damage to the Company.**

**EYDAP, is continuously upgrading its facilities, with the aim of gradually reducing the waste generated, by reusing by-products stemming from its production processes, recovering and generating energy from waste, and consistently reducing its greenhouse gas emissions.**



# Our impacts

## A. Circular economy, water resources management and sludge management

In the water sector, participating in the circular economy and in sustainable natural resources management starts with opting for renewable water resources, choosing energy-efficient technologies in transportation and distribution, and reusing renewable water resources.

In the Company's Water Treatment Plants the integrated management includes the adoption of good practices and actions that aim to reduce the consumption of water used during treatment processes.

**During the production of drinking water, the water required for cleaning the facility and for disposing of the solid waste generated during the treatment process is not wasted. Through appropriate treatment processes, much of this water is recycled and re-introduced into the production process, leading to its maximum utilisation, and thus minimising water losses.**

### Sludge processing in WTPs

**At the Galatsi Water Treatment Plant (WTP),** the sludge generated during the sedimentation process and filter washing is transferred to existing tanks. Part of it then forms part of the reclaimed water, which is taken to the WTP for re-treatment, while the rest is transferred, through the sewage system of EYDAP, to the Wastewater Treatment Plant of Psytalia.

EYDAP, in the context of sustainable management of water resources and the application of the best available techniques, invests in the upgrade of all its Water Treatment Plants and in the necessary additional projects for the treatment and management of the sludge generated during the water refining process.

EYDAP has prioritised the optimisation of the treatment of the sludge generated as a waste material from water treatment. With this goal in mind:



At the Polydendri WTP, in 2019 the construction of a modern sludge management unit was completed and the unit was put into operation. The sludge produced during water treatment is further processed. The solid waste is separated from water and then the water enters the WTP for re-treatment. The solid sludge produced is collected and transferred to licensed sites.



At the Aspropyrgos WTP, the maintenance and upgrade of the existing sludge processing systems was completed in 2019, when the systems were also re-put into operation. The sludge produced as a result of the purification of raw water is further treated. The solid waste is separated from the water and then the water enters the WTP for re-treatment. The solid sludge produced is collected and transferred to licensed sites.



At the Acharnes WTP, the construction of the sludge management and backwashing unit was completed in 2021. The sludge generated as a result of the water purification process is further treated. The solid waste is separated from the water and then the water enters the WTP for re-treatment. The solid sludge produced is collected and transferred to licensed sites.



At the Galatsi WTP, the construction project of the sludge management unit started in November 2022 and is expected to be completed in the second half of 2024.

**It is estimated that the sludge treatment plants that are already in operation at the Polydendri, Aspropyrgos, and Acharnes WTPs, together with the soon-to-be-completed equivalent unit at the Galatsi WTP will save:**

- 4,300,000 m<sup>3</sup>/year
- electricity consumption
- chemical processing materials of untreated water
- labour cost

**The treated sludge produced by the WTPs, is recorded online, on an annual basis, in the national database for the collection and processing of data regarding waste generation and management (Waste Register), in accordance with the relevant legislation, and is collected by licensed companies for further utilisation, as soil improver for various crops in cases of tree planting, for the cement industry and the ceramics industry.**

**14,590 tons**  
**of dehydrated sludge treated in 2022,**  
**in the Acharnes, Aspropyrgos and**  
**Polydendri WTPs**

## B. Circular economy in wastewater management

### East Attica New Projects

The integrated wastewater management systems in Eastern Attica is a strategic choice of EYDAP. The planning includes the reuse of treated effluents, using state-of-the-art technology and in full compliance with the current institutional framework for reuse.

*Detailed reference to this issue in the section "EYDAP Wastewater Network - Wastewater Collection & Treatment - Projects in East Attica" ➔*

### Wastewater Treatment Plants (WWTPs)

Solid waste is generated during wastewater treatment, consisting mainly of wastewater pre-treatment by-products and sludge. This is non-hazardous waste, the responsible disposal and management of which is a priority for EYDAP's stakeholders, e.g., the local communities in the areas of the wastewater treatment plants, especially taking into account the large annual quantities of waste generated.



Drying of dehydrated sludge - Psyttalia WWTP

#### At the WWTPs:

The **solid waste** generated during the pre-treatment phase (screening waste, sand and large solids), as well as the primary treatment sludge (fine screening sludge) is **landfilled**.

The drying of the **dehydrated sludge** generated by all three WWTPs, takes place at the Psyttalia WWTP. **All the quantity of the dried product is utilised thermally by the cement industry** as an alternative fuel, applying a technologically modern, environmentally friendly, and sustainable solution.

The dried sludge generated at all WWTPs is under consideration for being characterized as alternative fuel.

The **biogas** produced at the phase of sludge refinement at both the **Psyttalia and the Metamorphosis WWTPs** is utilised for **energy production**.

- **100%** of the biogas produced at Psyttalia WWTP is **used onsite** for the production of electricity and thermal energy.
- **70%** of the biogas produced in Metamorfoosi WWTP is **used onsite** for the production of thermal energy.

**Further energy utilisation of the biogas produced in Metamorphosis WWTP is planned, with the installation of a cogeneration of electrical and thermal energy plant (CHP).**

**Cogeneration of electrical and thermal energy plants at the Psyttalia WWTP** are fueled by biogas and natural gas. The electricity generated is consumed onsite at the Psyttalia WWTP. **Any excess amount is exported to the HEDNO (Hellenic Electricity Distribution Network Operator) power grid.**

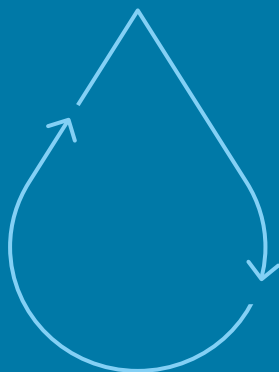
**Reuse of treated effluent at Psyttalia and Metamorfoosi WWTPs.**

## The Ellinikon Experience Park

### Reuse of treated effluent

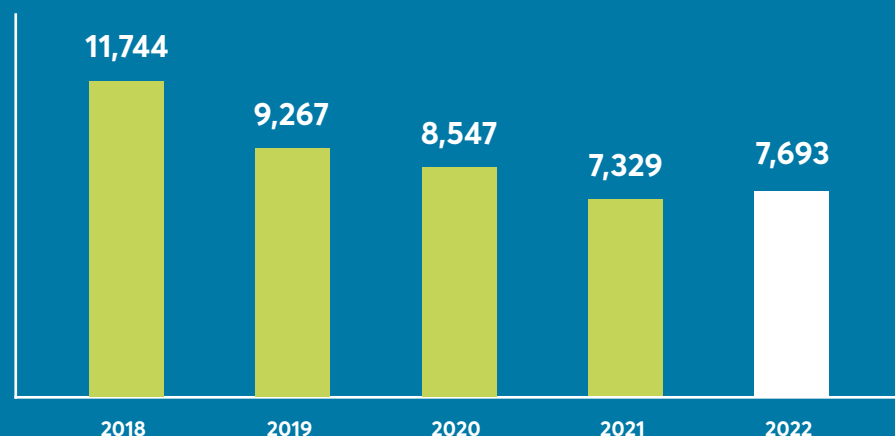
The study has been completed and is in the process of being implemented for the on-site treatment - in a compact unit - of part of the incoming wastewater in a pumping station of the Central Coastal Collector and the reuse of the treated effluent for the irrigation of Elliniko Park.

In 2022, a Memorandum of Cooperation and Understanding was signed with "Elliniko S.A.". EYDAP, with its expertise, will review the wastewater management studies (sewerage networks and wastewater treatment plant for the production of irrigation water) of the Ellinikon - Agios Kosmas metropolitan pole.



## Solid waste from wastewater treatment at the WWTPs

### Total amount of screening waste and grit landfilled (tn)

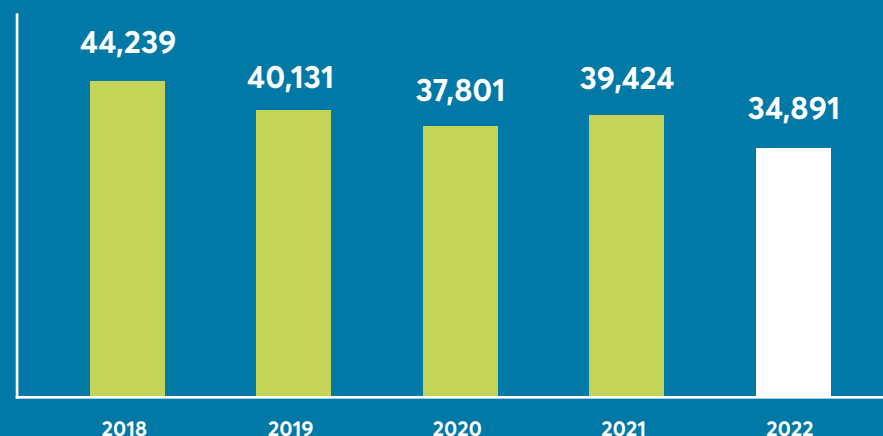


In 2022, the total amount of screening waste and grit landfilled in 2022 showed

- An increase by 4.7%** compared to 2021 value
- A decrease by 9.99%** compared to 2020 value
- A decrease by 16.99%** compared to 2019 value
- A decrease by 34.49%** compared to 2018 value

It should be noted that in 2018, the quantities of grit generated by the Metamorphosis WWTP were particularly high due to the evacuation and cleaning of the digester at this facility.

### Dried sludge produced at the Psyttalia WWTP (tn/yr)



In 2022, the total amount of dried sludge in the Psyttalia WWTP showed

- A decrease by 11.50%** compared to the 2021 value
- A decrease by 7.7%** compared to the 2020 value
- A decrease by 13.1%** compared to the 2019 value
- A decrease by 21.13%** compared to the 2018 value

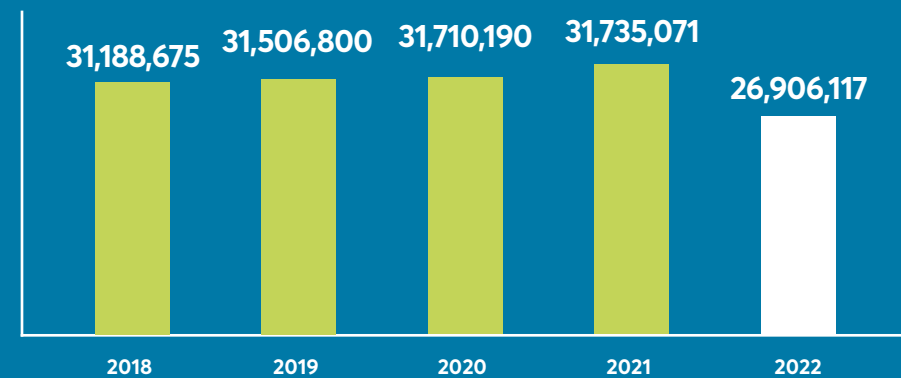
The decrease in dried sludge production in 2022 is mainly due to digesters maintenance.





## Biogas production

Total biogas produced at Psyttalia and Metamorfosi WWTPs (m<sup>3</sup>/yr)



The reduction in biogas production in 2022 is due to the maintenance of digesters, while in previous years it showed negligible changes.

**100%**

of the biogas produced at Psyttalia WWTP

and

**70%**

of the biogas produced at Metamorphosis WWTP

**are utilised for energy generation**

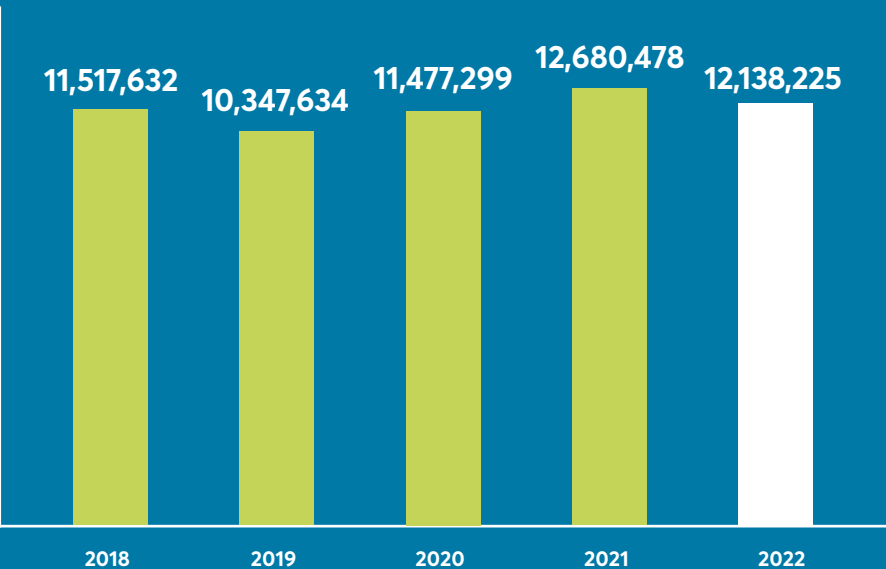


# Reclaimed water of the WTPs-WWTPs

## Reuse of the water produced from the treatment of sludge and leachate in the Water Treatment Plants (WTPs)

The construction of the sludge treatment units at the WTPs will permit the reuse of the water produced during the centrifugation of the sludge generated during the water refining process. This water will be added to the quantity of water generated during filter washing, which is already re-used in-house, and re-introduced to Mornos aqueduct for re-treatment..

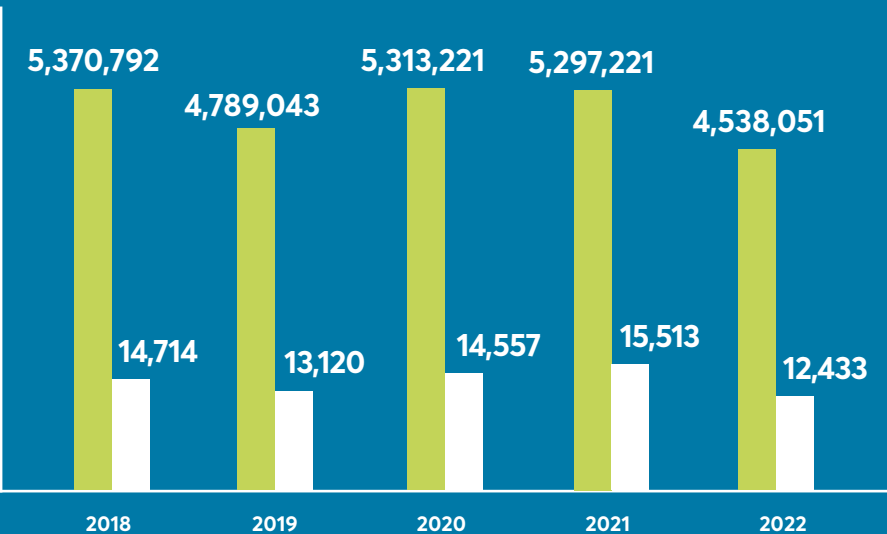
### Water recycled annually (m<sup>3</sup>)



## Reuse of reclaimed water from wastewater treatment in Wastewater Treatment Plants (WWTPs)

Part of the treated effluent (disinfected water and non-disinfected industrial water) of Psyttalia and Metamorfofi WWTPs is used to cover other onsite water needs (e.g., irrigation, equipment cooling, washing and other uses).

### Volume of reclaimed water (m<sup>3</sup>/yr) from the treated effluent that was reused



■ Annual total quantity (m<sup>3</sup>/yr)  
■ Daily reuse (industrial water m<sup>3</sup>/day)

# Divestment - sale of surplus or old equipment of EYDAP

In 2021, the new "EYDAP S.A. SALE - DIVESTMENT OF SURPLUS/OBSOLETE MATERIALS (BIDDING PROCEDURES) REGULATIONS " composed for the purposes of improving inventory management and in order to be applied in cases of all manner of surplus or obsolete materials, mobile equipment and consumables of the Company. The strategic context is that the above items are not useless burden but a valuable resource, which, if used properly, can provide multiple benefits with a positive economic and environmental impact.

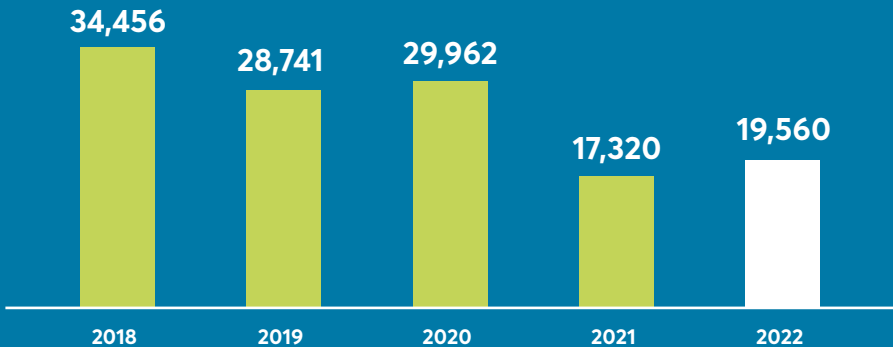
In 2022, two (2) new Public Tenders were held  
one for the sale of aged wood (budget of €15,725.42)  
one for old iron for recycling purposes (quantity of 487,642.30 kg)  
to contractors registered in the Chambers' registers for the management of this waste.



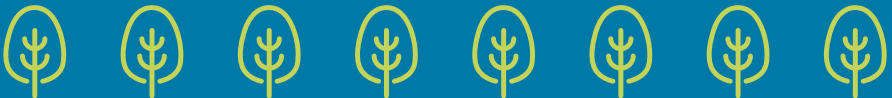
## Paper recycling (kg)

The total amount of paper used are collected in special recycling bins in the Company's buildings and facilities, from where they are collected by a licensed operator.

The paper collected follows through all the processing stages (shredding – baling – regeneration) and is forwarded to organisations for the production of new products.



**Decrease by 56.77%** compared to 2018 value  
The development of e-government applications and electronic document management systems contributed to a **decrease in paper use**, and consequently, paper recycling and minimize printouts.

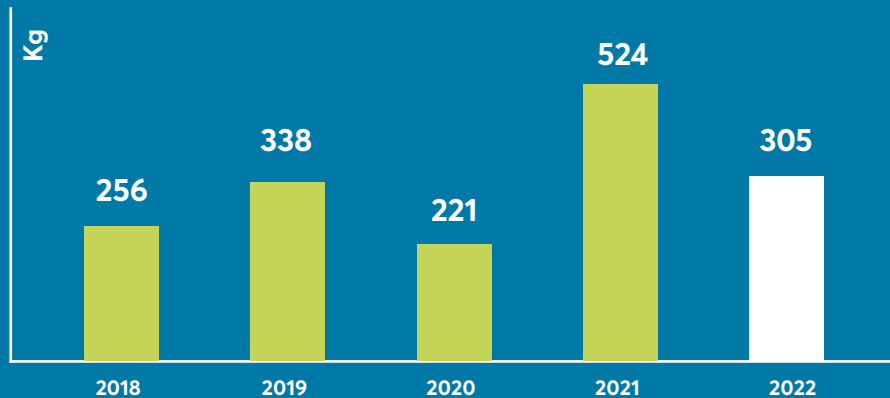


The total amount of paper recycled in the last five years amount to 130,039 kg, which amount corresponds to paper pulp produced from approximately

**2,094 trees**

## Battery recycling

Used batteries are collected in special bins in the Company's buildings and facilities by the Collective Management System for Portable Electric Batteries (**AFIS Recycling**).



**Over 1.5 tons of batteries were recycled!**

2017 (1st year of program implementation) –  
2022: total amount of batteries recycled

**1,871 kg**

## Recycling of electrical and electronic equipment

In order to prevent environmental impact from the hazardous substances contained in technological equipment devices, in 2022, EYDAP expanded the recycling process of waste materials of electrical and electronic equipment. The main goal is to recover and utilize recyclable metals, glass, plastic, etc. which are reused in the production process, thus contributing to the preservation of the planet's mineral resources.

The Company's recyclable electrical and electronic equipment is collected by an organization approved by the Hellenic Recycling Organisation (Collective System for the Alternative Management of Waste Electrical and Electronic Equipment).

**In 2022, a total of 11,301 kg of waste materials of electrical and electronic equipment**

## Recycling of plastic and aluminum

The amount of plastic and aluminum packaging used are collected in recycling bins located in the Company's buildings and facilities, where they are collected by a licensed entity holding exclusive permission for the management of solid waste intended for recycling.

**In 2022, a total amount of 85.10 kg of plastic and 28.30 kg of aluminum were collected.**

### 2023 GOALS include:

- development and implementation of an Environmental Management System throughout the Company according to the ISO 14001:2015 certification
- formulation and publication of the Company's Environmental Policy
- environmental liability insurance of the Company

During the reporting period, the Company has not identified any non-compliance with the laws and regulations related to the management and final disposal of liquid and solid waste



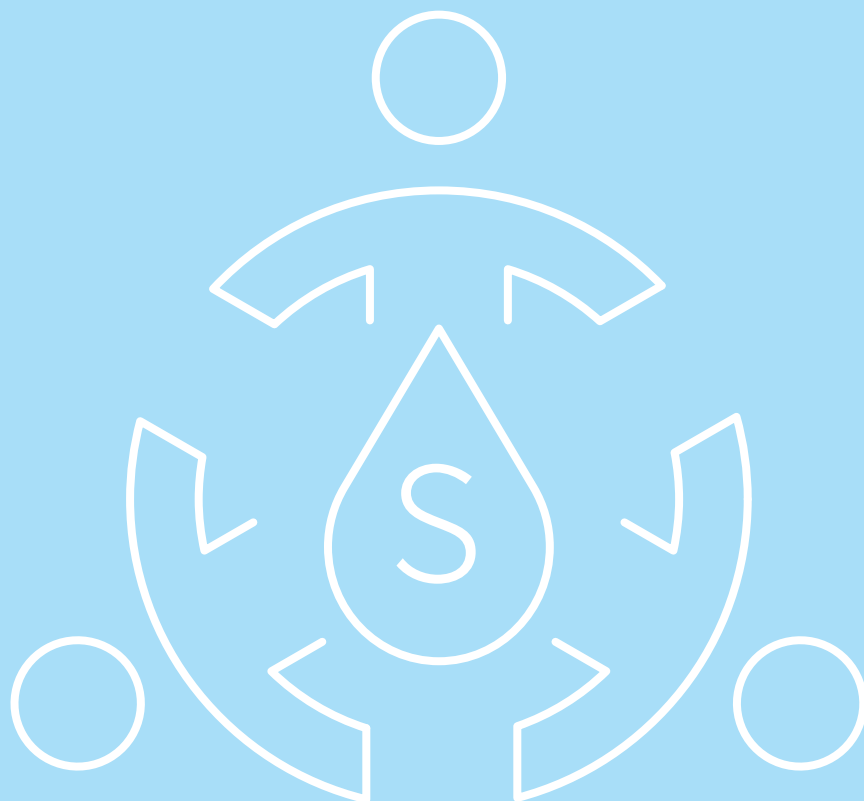
## 3.5 Regulatory & Environmental Compliance EYDAP

EYDAP operates in compliance with environmental legislation

- Complies with the approved environmental conditions for all its facilities (Wastewater Treatment Plants, Water Treatment Plants, External Aqueduct System etc.)
- The relevant environmental licensing procedure is followed for each new project or modification of the existing ones
- A Decision of Environmental Conditions Approval Permit has been issued for each Wastewater Treatment Plant (WWTP) and Water Treatment Plant (WTP) with their accompanying projects. The same applies to all the facilities of the External Aqueduct System
- The P/V Station of the Acharnai WTP has an Environmental Conditions Approval Permit (EPA)

**For all the Company's projects and activities there are valid Environmental Conditions Approval Permits or requests for their renewal or modification have been submitted in due time.**





## 4.

# SOCIETY

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**Our mission is to provide high quality and affordable drinking water to an increasing number of people and to return discharged water free of its pollution load back to the environment,** through the efficient management of all available sources, with social sensitivity and in terms of our contribution to Social Welfare.



## Water Network



**99.7%**  
EYDAP  
awarded for  
water quality



**4.4 million citizens**  
Served



**4 Reservoirs**  
Mornos, Evinos,  
Marathonas & Yliki

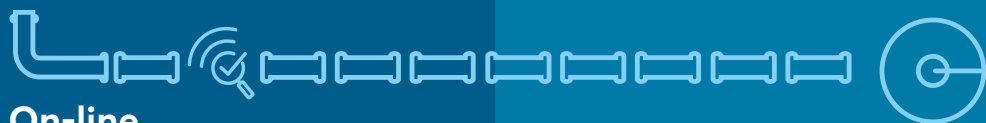


**495 Km**  
External water supply  
network

**4 (WTP)**  
**Water Treatment Plants**  
Galatsi-Acharnes-Polidendri-  
Mandra Aspropyrgos

**14,300 km**  
**Water supply and  
distribution network**  
Ensuring coverage with  
drinking water

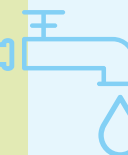
**2,247,915**  
water supplies



**On-line**  
water quality monitoring of critical  
quality parameters at 12 nodal  
locations in the external aqueducts

**5 Water Treatment  
Stages**

**Διασφάλιση** της κάλυψης  
με πόσιμο νερό από το σύνολο  
των εγκαταστάσεων του δικτύου  
ύδρευσης



**1,052,393.76 m<sup>3</sup>**  
Average daily drinking water  
distribution

**384,123,724 m<sup>3</sup>**  
Annual drinking water  
distribution

**Accredited  
water quality  
laboratories in Galatsi  
and Acharnes**

27/7 quality controls of raw  
and drinking water



**9,000**  
**drinking water samples**  
**per year**  
are tested for microbiological  
parameters compared to the  
**3,300** required by



**1000**  
water quality  
control points

**107**  
remote monitoring points  
(SCADA)









**1485**  
data recording and transmission  
points (SMS) and (GPRS)



**Drinking water quality  
data results**  
from water network are  
available on the corporate  
website



## Water Supply Network

-  EXTERNAL AQUEDUCTS
-  SUPPLY SYSTEM
-  SECONDARY SYSTEM
-  REFINERY (WTP)
-  WATER TANKER IN OPERATION
-  SMALL HYDROELECTRIC POWER PLANTS (SHEPS)
-  ECW - ENERGY CONSERVATION WORKS
-  REFINERY





## MATERIAL TOPIC

# 4.1 Health & Safety of Consumers & Workers

---

## 4.1.1 Access to Clean Water, Water Supply & Water Network Coverage

In order to ensure reasonable water consumption by its customers and thus to meet its water supply obligations, EYDAP procures the untreated water required entirely from the Greek State at the entrance of the Water Treatment Plants (WTPs).

The only exception is the Mavrosouvala boreholes, which are owned by EYDAP.



The infographic features a light blue background. At the top center is a small dark blue water drop. On the left is a large dark blue water drop containing the 'Commitment' text. In the center is a large white water drop containing the 2022 distribution statistics. To the right of the central drop is a white rectangular outline of a glass, partially filled with a light blue liquid. The glass is flanked by two columns of text describing water distribution to municipalities and islands. A green horizontal bar at the bottom contains text about water treatment methods.

## Commitment

The Company, manages water as a precious natural resource and as a valuable and vital commodity for the residents of Attica (and beyond).

.....

In the entire area of its competence

.....

To Municipalities and Municipal Units located in areas that are not under the responsibility of EYDAP SA. These areas are supplied with refined water from EYDAP SA through small water treatment plants that have been installed.

.....

**In 2022,**  
the Company  
**distributed an average**  
**of 1,052,393.76 m<sup>3</sup>**  
**of drinking water**  
**per day**

.....

To some islands of the South Aegean Region (Cyclades) and the Argosaronic (Municipalities of Aegina, Agistri) through the new underwater pipeline connecting Aegina via Salamina and through water-tanker ships, from special supplies, but also to cruise ships and boats in ports of Attica, etc.

.....

**In the Water Treatment Plants, water is made drinkable by the most environmentally friendly and natural resource-friendly methods.**



## Contract with the Greek State

According to Law 2744/1999 and the new 20-year contract between the Greek State, EYDAP Fixed Assets Company and EYDAP SA, which is valid from 01.01.2021, EYDAP is granted the exclusive right of water supply and sewerage services in the area of its competence, a non-transferable or assignable right.

The State undertakes the obligation, throughout the duration of the Contract, to supply EYDAP SA with untreated water of sufficient quantity which meets the characteristics of untreated water, at least in the quantities necessary for EYDAP SA to be able to meet the minimum water needs of its Consumers. The State is also obliged to upgrade the External Water Supply System (EWS) to ensure the supply of sufficient quantities of untreated water.

The Company, for its part, has the exclusive responsibility - a non-transferable right - for the treatment of this water, its distribution, and the operation and maintenance of its own water supply network, in order to meet the water supply needs of all consumers in its area of responsibility, both qualitatively and quantitatively.

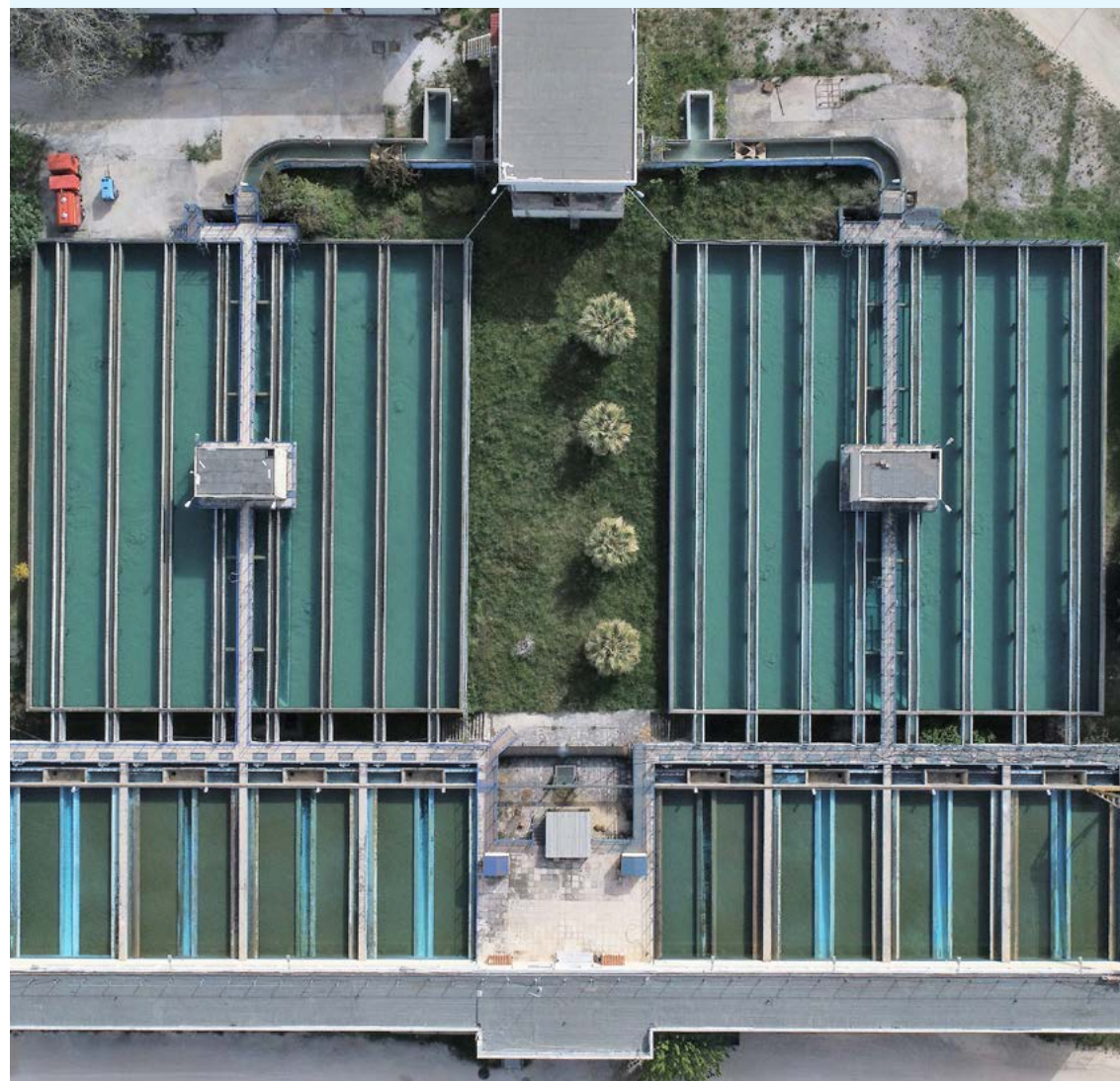
**Under a second 3-year contract** between the Greek State, EYDAP Fixed Assets Company and EYDAP SA, which is valid from 01.01.2021, EYDAP has undertaken (for a fee) the operation and maintenance of all facilities of the External Water Supply System.

The contract expires on 31.12.2023 with the possibility of unilateral extension by the State, under the same terms and conditions with a unilateral declaration by EYDAP for an additional period of six (6) months, i.e. until 30 June 2024. Any other extension is possible only by agreement of the Parties.

On **8.8.2023**, pursuant to the decision of the Board of Directors of EYDAP No. 17/8.8.2023, the unilateral extension of the contract for the operation and maintenance of the External Water Supply System (EWS), between the Greek State, EYDAP SA and EYDAP Fixed Assets Company, was approved for an additional period of 6 months, **i.e. until 30 June 2024**, with the same terms.

## Risks

Any disruption in the **quantitative safeguarding of water resources and in the ability to transport and distribute them** (External Aqueducts - Drinking Water Supply Network etc.) would immediately have a significant impact on consumers (water shortage), but also on the Company itself (damage to its image, reduction of revenues etc.), scaled proportionally according to the size of the problem that may arise.





# Our effects

## Water Intake Sources

EYDAP procures untreated water,



mainly from surface water resources of the Marathon, Yliki, Mornos and Evinos water catchment areas, classified in category A2, according to the European Directive 75/440/EEC on the quality required for surface water intended for the production of drinking water.



Of the reservoirs, only that of Yliki is natural (lake), while the others have been created by the construction of dams at appropriate points in the bed of the rivers Haradros (Marathon dam), Evinos and Mornos.



from underground water resources, which can be exploited by the operation of about 100 boreholes with a total annual pumping capacity of about 70-125 million m3 of water, depending on the availability of underground resources and their use policy.

Based on the current operating conditions, EYDAP's water intake sources can be divided as:

**Main water sources:**  
Mornos, Evinos.

**Auxiliary water sources:**  
**Marathon**  
(for the supply of the Galatsi WTP)  
**Yliki**  
(in emergency cases).

**Backup water sources:**  
groundwater resources -  
water wells.



## Protection of Reservoirs

EYDAP ensures the protection of reservoirs by

- **complying with strict legislation** (Health Decree A5/2280/1983, as amended, on the protection of water used for water supply in the capital region against pollution and contamination)
- **monitoring of projects and activities in the protection zones of** water catchment reservoirs
- **sample measurements of** reservoir water quality

## Water Transport - External Water Supply System

Water is transported from the water intake sources to the water treatment plants via aqueducts and interconnecting aqueducts,

**total length 495Km.**

The external aqueduct network is considered to be the set of pipelines and other works (such as pumping stations, etc.) from the outlet of the reservoirs up to the Water Treatment Plants (WTP).

The **External Water Supply System** is illustrated in the map below.

Despite the great distance of the main water sources (Mornos, Evinos) from Attica, **the largest amount of water is transported through the aqueducts by the force of gravity**, without the economic and environmental burden of energy-intensive pumping, which is only activated in cases of emergency, **thus actively contributing to the reduction of the environmental footprint.**





## Protection of the transport of untreated water - External Water Supply System Projects

In order to ensure the security of the water supply of the Capital, the implementation of four major critical projects in the External Water Supply System (EWS) has been planned and launched, on the one hand to support and secure the existing critical EWS infrastructure and thus ensure its fuller operation, and on the other hand to enable an alternative water supply to Attica basin from Lake Yliki.

### The projects concern:

#### 1. The rehabilitation of the 1800mm diameter duct Mornos - Marathon Unitary Aqueduct, section Klidi - Dafnoulia

The study titled "Definitive Design of Rehabilitation Works for the Joint Aqueduct of Mornos - Marathon, Section Klidi - Dafnoulia, and Preparation of Tender Documents" M-198, was completed, approved and finally received by EYDAP SA on 21/10/2021. In August 2022, the Ministry of Interior of the Republic of Macedonia assigned to EYDAP SA the implementation of the project, which is in the process of approval of the relevant tender procedure by the Board of Directors of EYDAP SA and is expected to be tendered in 2023.

#### 2. Securing the infrastructure, untreated water transfer project of Kithairon Canal to the wider Kokkinio area

The study titled "Definitive Design for the Safeguarding of Raw Water Transport Infrastructure of the Kithairon Canal in the wider area of Kokkinio, from 4+015 to 5+915 and preparation of the Tender Documents" M-199, is expected to be completed in May 2023.

#### 3. The completion of the works on the Thiva Canal of the Mornos Aqueduct

The design is expected to be completed in April 2023.

#### 4. The construction of a supplementary 2000mm diameter Aqueduct of the Mornos Aqueduct downstream of Kithairon.

The study is expected to be completed in July 2023. In August 2022, the Ministry of Infrastructure and Transportation awarded to EYDAP SA the implementation of the projects that will arise after the completion of the respective studies.

#### 5. At the same time, the Ministry of Infrastructure and Transportation entrusted EYDAP SA with the implementation of the project for the protection of the Mornos aqueduct from rock falls in the Kithairon canal.

The study of the project is being prepared by the EYDAP Fixed Assets Company and is expected to be delivered to EYDAP SA after its completion in order to tender the corresponding project.

#### 6. With the 02.02.2022 signed Contract for the assignment of Operation and Maintenance Services of the External Water Supply System of the Capital Region, between the Greek State, EYDAP Fixed Assets and EYDAP SA, EYDAP SA undertook to prepare and submit for approval to the Ministry of Infrastructure and Transportation, a proposal for the design of the installation of an integrated system of cutting-edge technologies for the safety and monitoring of the operation of the EWS (SCADA, Geographical Information System, Hydraulic Model, security cameras, fibre optics, etc.).

EYDAP SA has completed the design of the above project, which consists of:

- i. Proprietary Telecommunication Network based on optical fibres
- ii. Monitoring and Controlling System of the EWS
- iii. Hydraulic Model and Automatic Operation
- iv. Integrated Information Technology System for the supervision and control of the EWS

The project proposal was presented by EYDAP SA in August 2022 to officials of the Ministry of Infrastructure and Transportation and EYDAP Asset Company. The Bidding Documents, which have been completed, will be sent to the competent Ministry in 2023 for approval, in accordance with par. 5.2 of the Operation & Maintenance Contract of the EWS of EYDAP SA, with the Greek State.



## Management of the water supply system

The ways and methodologies of managing the water supply system are prioritized

on the operation of the existing water supply system,

on the regulation of the flow downstream of the reservoirs,

on the allocation of water abstraction by primary, secondary or back-up source

on water transport through the external aqueduct network

on additional works to strengthen and secure the water supply system, if needed

**The Management Plan** is the study of rational, efficient and sustainable ways and methodologies for the management of the External Water Supply System (EWS), aiming at the quantitatively reliable, qualitatively and environmentally safe and economically efficient coverage of the demand for water supply in the area under EYDAP's competence, through the appropriate use of the water resources available for the coverage of this demand.

## The management of the water resources system

involves the **determination** of the quantities to be withdrawn from the reservoirs and aquifers

the **way they are allocated** to the network of external aqueducts, in order to ensure the long-term adequacy of the water supply resources of the area under EYDAP's competence at the lowest possible cost.

**additional works** to reinforce the water supply system, if necessary.





The Decision Support System, which is used operationally on a daily basis by EYDAP for the supervision and management of the water supply system, includes the following components (subsystems):

**A.**

Geographic information system for the visualization and monitoring of the water supply system,

**B.**

System for measuring the water resources of Athens' water supply,

**C.**

System for the assessment and forecasting of the water resources of the Athens water supply,

**D.**

A system to support the management of the water resources of Athens' water supply.

## Ensuring coverage with drinking water

The drinking water supply is ensured by all the facilities of the water supply network.

**1,052,393.76 m<sup>3</sup>\***  
average daily  
consumption of water

**384,123,724 m<sup>3</sup>\***  
annual drinking water  
distribution



**878,732 m<sup>3</sup>**  
minimum daily consumption  
(March 2022)

**1,232,332 m<sup>3</sup>**  
maximum daily consumption  
(July 2022)

\* The discrepancy between the published information in the annual financial report was determined using the revised statistical bulletin.

In the region of the competence there are

**53**

reservoirs

**77**

pumping stations

**660**

pressure reducing valves with diameters  
ranging from 80mm to 600mm

**~ 90,000**

isolation valves

**107**

remote monitoring points  
(SCADA)

**1.485**

data recording and transmission points  
(SMS) and (GPRS)

In 2022, telemetric recording and telemetric data transmission (GPRS) instruments were added in 10 water network locations

There are approximately  
**1000 drinking water  
quality control points**

in the water supply network  
700 for chlorine measurements  
and 300 combined for chlorine  
measurements and other  
parameters as required by  
legislation.

In 2019 were added to the water supply network

**~150 new drinking water quality control points,**

in order to update and enhance the sampling points and to cover the  
new networks integrated by EYDAP after their acceptance by the local  
authorities (Salamina, Magoula, Agios Dimitrios Penteli).

Further technical, quantitative and qualitative data can be obtained from  
the Company's website [eydap.gr](http://eydap.gr).

## Water supply network

**14,300 km**  
of supply and distribution  
pipelines.

→ **~ 1,300 km**  
**main supply network  
(primary network)**  
pipes with diameters >300 mm to  
2,000 mm

→ **~ 13,000 km**  
**distribution network**  
pipelines with a diameter <300 mm,  
which transport drinking water to  
consumers.

**~ 9,000 km**  
for the secondary  
network

**~4,000 km**  
for the tertiary  
network

All of the above facilities  
ensure uninterrupted  
and continuous supply of  
drinking water and the  
ability to meet the daily  
needs of consumers under  
the conditions of seasonal  
demand.



The applied METHODS OF WATER RESOURCES MANAGEMENT are characterized by:

Scientifically based rationality.

Efficiency: in that they use water resources to the maximum extent possible

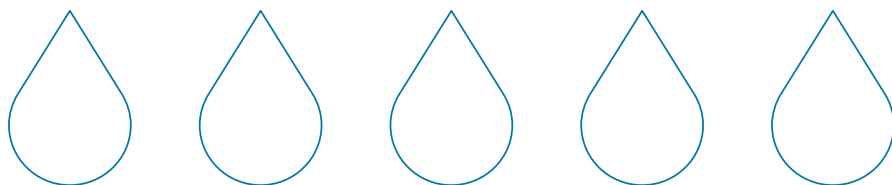
Sustainability: in that they do not create a problem of depletion of water resources in the future by meeting the needs of today.

**Demand is met with increased reliability**, reducing the probability of not meeting the required amount of water to very small and acceptable levels.

The concept of reliability refers primarily to the reduction of uncertainty caused by the variability of natural water supply (droughts), but also includes other sources of uncertainty, such as adverse events (breakdowns) during water supply system projects, for which EYDAP takes care by ensuring that they are dealt with.

**Demand is met with water of safe quality without creating problems for the environment (ecosystems) due to excessive water extraction in order to make it available for water supply use.**

**Demand is always met in the most economical way possible.**



## Leakage reduction

**EYDAP manages water demand by developing leakage reduction programs, (pressure management - water zones, immediate repair of water supply network pipe breakages, rehabilitation and replacement of water supply networks) aiming not only to serve customers, but also to protect the natural resource from being squandered.**

Aiming at the economically optimal identification of water loss management strategies, EYDAP collaborated with a specialized scientific team of the School of Civil Engineering of the NTUA through a contract signed on 8/12/21, in order to develop computational tools, adapted to the needs of the network, which will support the Company at an operational level.

The operational tools that will be developed will focus on the optimal prioritization of the replacement of the network pipelines, as well as on the optimal management of pressures, in order to reduce the actual water losses of EYDAP S.A.'s water supply network.

These innovative decision support applications will be adapted to the existing software and systems available to the Company, as well as linked to the simulation model of the primary and secondary network.

In order to implement the operational tools in the entire water supply network, EYDAP has already started to update the existing simulation model of the main supply pipelines, as well as to create the mathematical simulations of the networks of the piezometric zones.

The modelling of the water supply network is particularly important, as it allows the simulation of different operating scenarios. Through the simulations and the direct monitoring and evaluation of the results, EYDAP can take decisions on the optimisation of the network, either in terms of operation, expansion or reinforcement needs.

By developing the mathematical simulations of the water supply network, the Company is laying the foundations for the future infrastructure of the Digital Twin of the water supply network and its communication with other operational tools, in order to monitor the operation of the network in real time and to make optimal decisions for the management of the network.



## Water supply in new areas

Today, EYDAP provides excellent quality drinking water, in the necessary quantity and pressure, regardless of whether the Company in all regions has the responsibility of managing the water supply network primarily, or in some of them the local network is managed by the relevant local authorities.

For those few areas that are not supplied with water by EYDAP but by boreholes, mainly in West Attica, EYDAP has launched a series of interventions and actions, in cooperation with the local authorities, so that in a short period of time they will be included in the total number of areas that will receive water from EYDAP.

In this direction, the implementation of the projects

- **"Water supply to the settlement of Kinetta Megara - Phase A"** , has been launched, which includes the construction of a new steel supply pipeline 500mm in diameter, approximately 15km long, as well as a water reservoir, through which the area of Kinetta will be supplied with water, which until now is not supplied with water by EYDAP. **The project is currently in progress.**
- **"Feeder Pipeline of Perama Reservoirs via Schisto Avenue"** ,was launched, for the construction of a new steel feeder pipeline, 300mm-600mm in diameter and a length of approximately 4km, which will supply the existing reservoirs of the Municipality of Perama, without the help of the boosters that are currently used for the water supply of the area, thus reducing to a minimum the current consumption of electricity. The contract for the construction of the project was signed on 20.09.2021. **The project is currently under construction.**

**The construction of the underwater pipeline which connects Salamina and Aegina island was completed under the responsibility of the region of Attica.**

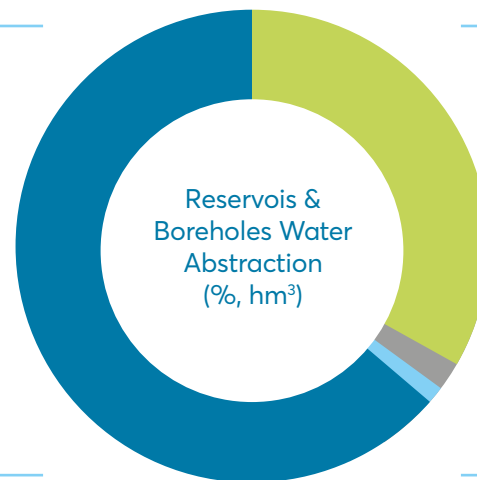
**In January 2022 EYDAP supplied Salamina island with potable water.**



**2022**

### the distribution of water resources (in hm<sup>3</sup>) of the water resources

allocated to cover all water supply needs (EYDAP, Municipalities, Organizations, etc.)



■ Evinos	■ Marathon
64%	2%
280,1	9,6
■ Mornos	■ Boreholes
34%	0%
146,8	0,7
■ Yliki	
0%	
1,8	

The above allocation refers to the optimal management of water resources for the given year.  
Withdrawals are measured at the water intakes with flow meters. .





## MATERIAL TOPIC

### 4.1.2 Reliable Water Supply Network

For EYDAP, ensuring throughout the water supply system sufficient quantities of high quality drinking water at acceptable pressure conditions, while protecting the natural resource, is a key priority.

**The design, construction, operation, maintenance and continuous development of the water supply network is a complex multi-factorial process, requiring a high level of expertise.**

A region's **WATER SUPPLY SYSTEM**, which ensures the supply of drinking water to the region, comprises a system of reservoirs, supply (main) pipelines, distribution pipelines and water connections.

The term «**WATER SUPPLY NETWORK**» refers to all the **pipelines carrying treated water from the local Water Treatment Plant to the water meters of the consumers**. It is the main part of the entire facilities of a Water Company, most of which is underground. The water supply network provides pressurised water suitable for drinking, in accordance with the standards in force in Greece, to all consumers.

The size of the area supplied with water, the morphology of the soil, the density of the population and the estimated change as well as its geographical distribution, the height of the buildings, the expected consumption by calculating the average daily consumption - low and high - are some of the factors that determine the quantity of drinking water supplied, the pressure of the supply and thus the rational design of the network.

EYDAP's AREA OF COMPETENCE was defined as the Capital's greater area, as defined in its founding Law 1068/1980. Law 2744/1999 allowed EYDAP to expand its activities, subject to conditions, within and outside the Attica basin. Recently, article 68 of Law 4313/17-12-2014 amended article 8 of Law 2744/1999 and EYDAP SA's area of operation was expanded to all the municipalities of the Region of Attica, as defined in subparagraph i' of paragraph 3 of article 3 of Law No. 3852/2010 except the Municipalities of Aegina, Troizinia, Kythira, Agistri, Spetses, Hydra and Poros, of the Regional Unit of the Islands of the Region of Attica.

*Detailed reference is made in the section 1 of the report.* ➔



### Risks

Responsible management of the water supply network and ensuring water efficiency contributes to meeting the needs and expectations of our stakeholders, increasing their trust in the Company, reducing losses, lowering maintenance costs and maintaining water quality.



## Our impacts

**MONITORING AND IMPROVEMENT OF WATER SYSTEM OPERATION** (demand monitoring, pressure monitoring, pressure zone modifications, etc.).

Attica is characterized by its rugged terrain.

**EYDAP supplies water to areas with ground elevations from 0 to 600 meters above sea level.**

## Pressure zones

In order to better control the pressure of the pipelines, pressure zones have been created, i.e. ground areas with a specific pressure every 30 to 40 meters of altitude difference. The range of pressures within the hydraulic zones varies from 2 to 12 atm with the vast majority ranging from 4 to 6 atm. The water supply network is monitored on a 24-hour basis by a remote control - remote management system (SCADA).

In order to achieve better management of the network, there are a total number of

**~ 180**

**flowmeters in network feeders**

(in 2022 the existing problematic flowmeters were replaced and installed new ones)

**1,485**

**telemetry stations**

(10 telemetry stations in 2022)

**107**

**SCADA stations**

**Maintenance of the network - preventive and emergency**  
(maintenance of pumping stations, fire hydrants, cleaning of reservoirs, repairs of leaking pipes - supplies, etc.).

H Preventive maintenance of pipelines results mainly from the statistical analysis of failures.

Similar actions are being launched by EYDAP for the maintenance of the water supply pipelines through specific modern intervention methods, as well as for all the other supporting infrastructure of the water supply network (pumping stations, reservoirs, wells for special waterfalls and large valves, fire hydrants, etc.).

**Failures of the water supply network that cause leaks or breakages in the network at EYDAP's complaint call center**

**1022 24/7**  
customer service



Routed for repair to the competent technicians of the Water Supply Sectors. Their repair is implemented immediately, so as to minimize the inconvenience caused to consumers - customers and to restore the normal water supply of areas where the network is damaged.

**≈ 7,453**  
**total number of leaks in 2022**

(breakages of both pipes and valves in all the networks handled by EYDAP)

**These leaks were in their entirety repaired immediately by the Services of the General Directorate of Water Supply.**

**56,797.541K m<sup>3</sup>**  
**water losses amounted in 2022**

Actual water loss refers to the disparity between the overall water losses and apparent losses, which encompass unauthorized consumption and errors in metering and measurement.

**Extension, replacement and rehabilitation of existing network pipelines and water supply properties**

EYDAP's existing network consists of pipelines of different cross-sections and different materials, which have been installed over the years to serve the increased water supply needs of Attica's residents.

Many of these pipelines have been in operation for many years, and due to the original conditions under which they were laid and the development of the city and the successive reconfigurations of roads and other public spaces, combined with other nuisances (traffic, other external factors), they have been subjected to significant stresses leading to frequent breakages. Similarly, the water courses of the properties supplied by these pipelines are of the same age and are subject to similar stresses as the pipelines. **The operating conditions of these pipelines are assessed by EYDAP and then programs to replace them with new pipelines and water mains made of the most modern materials are defined and implemented.**

**In 2022, EYDAP replaced, installed new and relocated a total of**

**80,665.6 m of pipelines**

**Replacement existing pipelines: 71,829.60 m of pipelines**

with cross-section 63mm, 90mm, 110mm, 160mm, 160mm, 200mm, 250mm, 300mm, 315mm

**Installation of new pipelines: 6,154.04 m of pipelines**

- 3,944 m related to paid extensions of water mains by customers-consumers, in order to achieve the placement of water connections in front of their properties and
- 2,210.04 m related to pipeline extensions resulting from the general planning of new pipelines by the General Directorate of Water Supply.

**Displacements of existing pipelines: 2,682 m of pipelines**

**The Company replaced/repaired**

**~ 14,876 water connections to properties.**





## Adjustments - displacement of pipelines due to third party works

In the context of works carried out by third parties, EYDAP is called upon to intervene in its network in order to facilitate the execution of new works taking place on the city's roads.

### 2,682 m were installed in 2022

**1,475 m** to replace existing ones

**1,207 m** to cover new water supply needs arising from the interventions of third parties in the city (indicatively, METRO, ERGOSE, etc.).

## "Smart Meters"

Aiming at the sustainability of the resource, along with the modernization and optimization of the network and asset management, the Company is in the process of developing a **"Smart Grid"**.

EYDAP by 31/12/22:

**Has replaced 1,090 old mechanical water meters** of special water supplies of 2-inch to 8-inch cross-sections, with the installation of corresponding electronic water meters of modern technology (smart meters) with the same number of dataloggers.

**Has already implemented (years 2017-2018) two pilot applications with the installation of 83,500 electronic household water meters** in the Municipalities of Halandri & P. Faliro and in the Varvakeios Market and the surrounding streets.

**In 2023, a new tender will be launched for the replacement of the remaining mechanical water meters of special water supplies with the installation of new electronic water meters with corresponding recorders in order to fully cover the special supplies (hydrometer cross-section  $\geq 2"$ ) with electronic water meters.**

## The "Smart Grid"

- includes information and communication technologies in the distribution infrastructure and throughout its operation. The advantage of "smart meters" is that they calculate the respective measurements at a more advanced level, communicate with the latest technologies and send information for monitoring, prevention, savings and correct billing purposes
- contributes to the implementation of water saving projects (reduction of losses, optimisation and automation of water resource management)
- can meet future demand growth, enhance the efficiency of network operation and integrate smart devices to improve service and customer interaction
- regulates and controls the distribution of the resource and aims at smart interconnection of consumers and production
- helps to ensure a more economical and secure network with reduced losses by meeting demand in a timely manner

### Through this, EYDAP can now:

- collect detailed data on the status of each specific supply with a remotely scheduled rate of data collection and transmission to a central infrastructure (Operations Center)
- provide consumption and supply information in detail and in graphical form to its special customers online.

**EYDAP has included in its investment program the installation of new smart meters to replace existing older technology ones in order to transition to the smart water network and modern technologies.**







## New connections

EYDAP continues to install new common water connections and Special Connections to properties, upon request and as long as they are approved in accordance with the provisions of the Water Supply Network Operation Regulation.

**The water connections connected to the water supply network pipelines are divided into: Water supply, fire-fighting, common areas of real estate, irrigation of state or municipal areas, temporary for construction or other use.**

**≈8,188**  
new household, special and fire fighting connections in 2022

↑ **≈1,200 more than in 2021**  
**a figure that confirms the continuation of the intense construction activity in the city.**

## Fire Hydrants

In 2022, having as a priority the prevention, preparedness and protection of life, health and the environment from fires, EYDAP, in cooperation with the Fire Department, carried out an inspection of all installed Fire Hydrants. The inspections carried out revealed the need to repair **220 Fire Hydrants**, replace **27 non-operational ones** and install **8 new Fire Hydrants** at the suggestion of the Fire Service in scattered locations in the network.

## Reservoirs

In order to ensure the good quality of the water supplied to the consumer, EYDAP carries out periodic cleaning of the water storage reservoirs every three years. Based on this schedule, **22 water storage reservoirs** in the water supply network were cleaned in 2022.



New type water meter shaft



Certified water meter testing laboratory



New type water meter shaft system

## New Network Deliveries

EYDAP takes over Water Supply Networks within its area of competence, which are managed by the relevant Local Authority. The acceptance of these networks, which are mainly located in East and West Attica, is a strategic objective of EYDAP.

The acceptance of the Municipal Water Supply Networks by EYDAP is not carried out unilaterally. The basic prerequisite for this is the approval of the Municipal Council of the Municipality.

### New Networks

**In 2021 the contract of transfer and delivery to EYDAP SA was signed,** of the municipal water supply and sewage network and the Wastewater Treatment Plant of the **city of Megara**, the municipal sewage network of the city of **Nea Peramos**, the municipal water supply networks of the areas of **Kinetta, Vlychada (Agios Panteleimonas), Nea Zoi, Kandylion, Koumindrion, Lakka, Agia Triada, Iremono Kima, and Pachi of the Municipality of Megareon and the recognition of debts of the Municipality of Megareon to EYDAP S.A.** The relevant handover protocol has not yet been signed though, which has not allowed EYDAP SA to establish itself in the Municipality and start managing the network.

### Improvements of the water supply network of Salamina Island

In the context of the interventions launched by EYDAP SA for the improvement, replacement and modernization of received municipal networks, in January 2021 the Board approved the launch of a new public online tender for the implementation of works for extensions, improvements and replacements of pipelines, water supplies and other facilities of the water supply network of Salamina Island. **The project in question is currently at the stage of contract signature and is expected to start in June 2023.**

**Under certain conditions, EYDAP may undertake the supply and management of networks in areas outside its competence.**

## Water Supply Network Operating Regulations

In 2009, the new Water Supply Network Operating Regulations were adopted, which regulate in detail the most important issues of the Company's operation.

**The consumer directly subscribes to these regulations by signing a water supply contract with EYDAP.**

## Strategic actions for the optimal management of its network

- the application of modern technologies of **advanced pressure management** in the water supply network, which results in avoiding unnecessary stress on the network pipelines from excessive pressures and, consequently, avoiding network breakages, thus achieving an increase in service life over a long length of the network with significant economic benefit.
- the **reliable and organised collection of data on faults, operation, etc.** in order to achieve further processing and statistical exploitation of the collected data through structured and collaborative applications.
- the **identification of the frequency of occurrence of faults, the speed and quality of repairs, the determination of their geographical dispersion, the cause of their occurrence, etc.** in order to draw up a comprehensive and systematic maintenance program for the water supply network.
- the inclusion in the **Company's five-year investment program** of the implementation of a targeted, documented prioritized **water supply network replacement program**, which includes the replacement of approximately 150 km of pipelines (primary-secondary and tertiary network), corresponding to approximately **1.5% of the total length of the network per year, following and complying with global best practices.**

With the above, in combination with the other actions and interventions that have already been launched (massive replacement of water meters, interventions in supply pipelines, maintenance and renovation of existing infrastructure such as pumping stations, water pipes and valves, launching of operational interventions in the network through modern software and modernization of existing operating structures), it is estimated to achieve more efficient operation of the water supply network, consistent reliable and uninterrupted water supply, improved level of service to consumers and ultimately improved overall corporate image in terms of service performance.





EYDAP's OBJECTIVE in the Water Sector is the steady and targeted transition to new technologies by monitoring and exploiting all the modern trends of the technologically advanced international water market.

In this direction, a number of EYDAP executives follow the actions of international water organizations, and international water-related conferences, visit large factories producing materials and instruments, and are in constant consultation with other advanced water companies and international practices that have incorporated or have started to incorporate new technologies in order to transition to the smart water network.

### Synergies - Digital Innovation Competition

An original, open competition of technological innovations, announced in November 2020 in collaboration with the HCAP Innovation Network and MIT Enterprise Forum Greece.

**Start-up companies, teams of scientists, university research centers, etc. were invited to offer innovative solutions to two challenges:**

*Reference is made to the "Digital Transformation" section of the same Report.*



## 4.1.3 Quality of Drinking Water

EYDAP, as the largest provider of water supply services, aware of its responsibility towards millions of consumers, is committed to ensuring the excellent quality of drinking water. Through continuous investment in infrastructure, technology and training of its human capital, EYDAP guarantees drinking water quality among the highest in Europe, always in compliance with the applicable regulations.

### International evaluations

**99.7%**  
**EYDAP's water quality**  
**was rated**

a figure higher than the average rating achieved by the participating Western European companies in the annual international assessment of water companies issued in **2022** by the **European Benchmarking Co-operation**.



**The excellent quality already starts from the main supply reservoirs Evinos and Mornos.**

### Commitment

**To provide high quality and affordable drinking water to an increasing number of citizens and to return treated water back to the environment free of its pollution load, through the efficient management of all available resources, with social sensitivity and with a view to contributing to social well-being.**



## Main Risks

- Progressive deterioration of the quality of the water supply due to pressures from human activities. This risk is limited due to their location, as they are located at high altitude, in areas with low altitude and low population density and very limited activities. EYDAP ensures the protection of its reservoirs by complying with strict legislation as it results from the Health Decree A5/2280/1983 "for the protection of waters used for the water supply of the capital region from pollution and contamination and the PD51/2007 concerning the definition of measures and procedures for integrated water protection and management in compliance with the provisions of Directive 2000/60/EC.
- Sudden deterioration in the quality of the water supplied to consumers, either due to a natural disaster, the unintentional introduction of inappropriate substances into the water supply network, malicious or terrorist acts, or a failure in the operation of installations.



## Our impacts

Proactively addressing such risks, in addition to enhancing the Company's reputation, guarantees the safety of consumers and the resource. In addition, it prevents the imposition of fines due to non-compliance with applicable legislation.

In order to continuously ensure the quality of water supply water for consumers, EYDAP has carried out an analysis and assessment of the risks it may face in this area.

For none of them, the probability of occurrence is considered high. For each risk case, a relevant preventive action plan has been developed and implemented.

EYDAP **makes sure** that all risks that could potentially disrupt the quality of both the water entering its facilities and, in particular, the water reaching the consumer's tap are adequately identified and controlled through:

- Monitoring of activities in catchment areas
- Monitoring, operation and maintenance of dams / reservoirs / aqueducts, through which water is collected and supplied to Attica
- Maintenance and operation of the drinking water distribution network
- Continuous quality control of untreated and drinking water supplied to the public.

and **provides** for the implementation of appropriate water quality control procedures to:

- Meet the requirements of the Legislation and its Stakeholders.
- Apply good laboratory practices and appropriate methods to ensure the reliability of measurements.
- Provide appropriate and adequate resources (human resources, equipment, information) for the implementation of the quality functions and use them in such a way as to ensure the reliability and overall effectiveness of all measures designed and implemented.
- The quality, impartiality and integrity of the measurements made during quality checks are not influenced by any commercial, economic and other pressures.
- All personnel involved shall be trained and evaluated to ensure that they are familiar with and fully implement the task assigned to them.

# Control framework

EYDAP has established an appropriate framework of controls to ensure that the water supplied to the consuming public is safe.

Quality controls concern:

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## The raw materials used for water treatment

### The materials used in the construction of the drinking water distribution network

The chemicals intended for the treatment of water for human consumption and the materials used in the drinking water distribution networks supplied by EYDAP are specified to comply with internationally developed standards, e.g. ELOT EN 878, ELOT EN 937, ELOT EN 12201, etc. For each substance and for each material there is a quality plan to ensure its suitability for its intended use.

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## The untreated water in the reservoirs and at the inlet of the Water Treatment Plants

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### Drinking water supplied to the consumers.

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# Frequency of checks

EYDAP carries out:

- Daily quality checks of untreated and drinking water,  
**7 days a week**
- Close monitoring of the water quality of the four reservoirs, Marathon, Yliki, Mornos and Evinos, with on-site visits, sampling and analyses at least  
**eight (8) times/year**
- **Daily sampling and analysis of the quality of drinking water in the water supply network,** in order to address any potential problem in a timely manner, so that any problem that may arise can be dealt with in a timely manner.

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**The checks carried out, particularly on drinking water, exceed the frequency required by law.**

**The number of drinking water samples tested for microbiological parameters exceeds 9,000 per year compared to the 3,300 required by legislation.**

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## WTP – Water treatment stages

Water Treatment Plants (WTPs) are absolutely crucial for the quality of the drinking water, providing excellent quality of drinking water



**1,800,000 m<sup>3</sup>/day**

with a cumulative maximum refining capacity of the 4 WTPs

**Galatsi WTP**



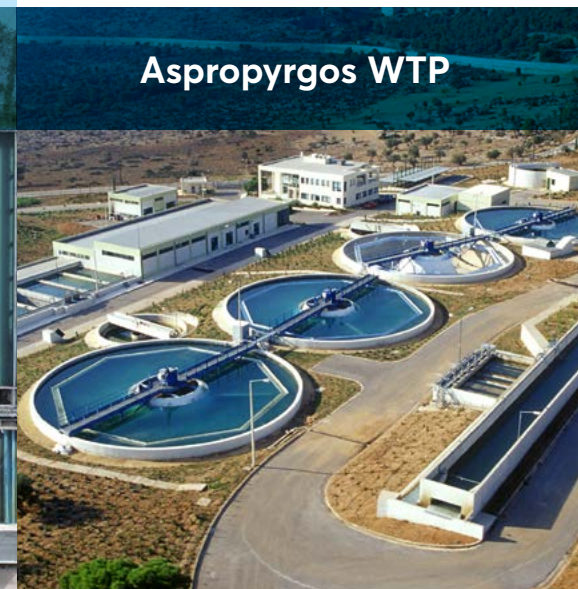
**Acharnes (Menidi) WTP**



**Polidendri ("Kiourka") WTP**



**Aspropyrgos WTP**



The surface water arriving untreated at the WTPs is subjected to **5 treatment stages**

**Pre-chlorination → Flocculation → Sedimentation → Filtration → Post-chlorination**

The pre-chlorination and post-chlorination stages involve the disinfection of the water through the application of chlorine gas and now sodium hypochlorite (until the complete withdrawal of chlorine gas at the end of 2023).

Through disinfection, the water reaches consumers free of micro-organisms and parasites and becomes hygienic and safe.

In the facilities of the Galatsi WTP, the gradual replacement of chlorine gas with a ready-made sodium hypochlorite solution started at the beginning of May 2021.

In the current time period sodium hypochlorite is used as the main disinfectant

- in the Galatsi WTP at a rate of 97%.
- in the Aspropyrgos WTP at a rate of 100%.
- in the Acharnes WTP at a rate of 85%.

The complete migration from chlorine gas to the ready-to-use sodium hypochlorite solution will be completed

- in the 2nd quarter of 2023 at the Galatsi WTP
- at the Acharnes and Polydendri WTPs in the 2nd half of 2023.



## Works And Initiatives

In the context of the **continuous improvement of the facilities and water treatment**, the following procurement procedures have been initiated and are in progress:



**Thirty (30) dosing pumps for sodium hypochlorite, polyelectrolyte and liquid sulfuric acid for the Water Treatment Plants.**



**New modern vertical pump units of high efficiency and low energy consumption for the Aspropyrgos Recovery Unit of the Aspropyrgos WTP.**



**Installation of one hundred (100) electrically driven servo drives, in order to fully automate all processes of the final stage of the water treatment of the WTP.**



**37 Sophisticated Systems for on-line monitoring of critical quality parameters in untreated and treated water that send real-time results and timely alerts in case of extreme values. The new systems will be installed within the facilities of the four WTPs.**

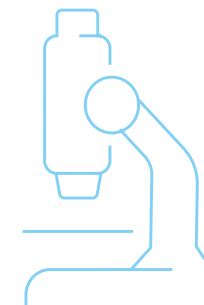
*More information is available on the EYDAP corporate website [eydap.gr](http://eydap.gr)*



## Water Quality Testing Laboratories

EYDAP has accredited laboratories in Galatsi and Acharnes for water quality testing.

Samples are analysed



**from untreated water  
from the reservoirs,  
the boreholes of EYDAP**



**drinking water from  
the Water Treatment Plants**



**from the Company's water  
supply network.**

**EYDAP has laboratories for the control of the intermediate stages of water treatment,  
installed in each of the four Water Treatment Plants.**

Among the analytical techniques applied are automated photometric analysis, ion chromatography, gas chromatography with MS/MS "triple quadrupole", ECD, FID and olfactometry detectors, HPLC liquid chromatography with fluorescence and UV detectors, plasma spectroscopy with emission detector, online toxicity testing with Daphnia organisms, and ELISA.

As part of the continuous improvement of quality control mechanisms, from the beginning of 2022, **new state-of-the-art analytical equipment** will be operational, including a UHPLC-HRMS q-TOF liquid chromatography system and an ICP-MS spectrometry system, as well as equipment designed to automate and optimise laboratory work (integrated automated sample processing system with Solid Phase Extraction, SPE).

The following new equipment was installed in 2022: automatic thermal cycler (PCR), a new liquid sterilization furnace (autoclave), equipment for the automation of the preparation of nutrient substrates and their distribution in petri dishes, as well as supporting laboratory equipment to modernize or replace obsolete equipment, including a cooled incubator, laboratory refrigerators, etc.

**In EYDAP's laboratories, the most modern analytical methods are applied for the determination of the elements required in water samples in order to achieve high sensitivity, accuracy and repeatability of measurement.**

## Systems for monitoring qualitative parameters in the external water system

### 12 nodal locations in the external aqueducts,

sophisticated systems for on-line monitoring of critical quality parameters in untreated water are installed and send real-time results with telemetry and timely alerts in case of extreme values.

In 2022 a tender procedure was carried out to enrich the quality stations with additional sensors.

↑ With this new supply, continuous measurement and on-line recording of turbidity, temperature, conductivity and/or organic load (TOCeq) in the water will be possible in 22 in total, including the existing, nodal locations along the Mornos and Ylikis branches' waterways, the Marathon aqueduct and the entrances of the four Water Treatment Plants.

Through the EWS stations, it is possible to be informed immediately about incidents related to the quality of the incoming untreated water in the water treatment plants and therefore to take timely measures to deal with the phenomena, so as not to create problems in water treatment in the water treatment plants, the impact of which may affect the water to be consumed in the water supply network.



## Critical quality parameters are monitored on-line and in drinking water

The use of on-line measurements helps to reduce the need for physical human presence to take samples, reduces sampling costs and gives for some critical quality parameters the advantage of monitoring them in real water network conditions and in real time.

In selected reservoirs of the water supply network **residual chlorine is monitored on-line**.

In **2022** the tendering procedures for the supply of modern, continuous chlorine measurement systems for all the reservoirs in operation were carried out.

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In **2018**, two quality parameter monitoring systems were also installed in the drinking water network.

In **2019** they were enriched with additional sensors and capabilities, in accordance with EYDAP's requirements.

In **2020** these two systems were further developed with the possibility of returning the sampling water to avoid water losses, as well as the **possibility of energy supply from solar panels and/or hydro turbines**. One is installed within the urban area and close to the Galatsi Water Treatment Plant, while the second one is located in the area of Sounio (end point of the network). Thus, EYDAP now has two "smart", energy self-sufficient, and environmentally friendly systems for real-time monitoring of quality parameters in the water supply network, as well as early warning and prevention of potential problems.

Following the successful implementation and operation of these two systems, further installation of such 'smart' systems is planned.



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In **2021**, new on-line equipment was installed at the rapid refineries of EYDAP SA, located along the Mornos aqueduct in areas of the prefectures of Boeotia and Fokida, for the continuous and real-time quality control of the water produced there, while the remote monitoring of the quality control of the water of the rapid refineries has already been initiated and is expected to be implemented within 2023.

During **2022**, two systems for the remote and online measurement of trihalomethanes (THM) were pilot tested at EYDAP's facilities for a period of three months each.

The THM parameter is considered critical as it is an indicator of undesirable water disinfection by-products, the concentration of which should always be within the legal limits. The possibility of taking remote, real-time THM measurements from strategically remote points in the water supply network, in addition to other obvious advantages, helps to optimise both monitoring and control of their formation during the water supply network.

The two systems tested were of different analytical techniques, and their results highlighted the low values of THM in EYDAP water, which are almost three times lower than the legal limit of 100 µg/l. Moreover, important data were obtained for the evaluation of the level of investment and the maturity of the available solutions for further enrichment of quality control with such systems.



## Projects and initiatives

EYDAP systematically monitors and records, in a file kept at the Water Quality Control Department and in accordance with the provisions of the Quality Assurance System, not only the existing legislation but also **international trends in regulatory issues**, which may become future legislative requirements or stakeholder requirements. As a result of this action, **the list of substances monitored is continuously enriched**.

As part of the continuous improvement of quality control mechanisms, the following procurement processes have been initiated and are currently underway:

- **14 sophisticated systems for on-line monitoring** of critical quality parameters in untreated water, sending real-time results with telemetry and timely alerts in case of extreme values. The new systems will be installed in 2023 in the external aqueducts to complement the existing network of stations in terms of locations and parameters.
- **53 new on-line instruments** for continuous monitoring of **residual chlorine in drinking water at the drinking water reservoirs** of EYDAP's water supply network, in various points of Attica.
- For the modernization and enrichment of the **laboratory equipment**, a new gas chromatography - GC-MS/MS sequential mass spectrometry system, a new ion chromatography system, a new total organic carbon system, etc..

## Corporate social responsibility activities

*Detailed reference to the issue in the section "Local Society - Environmental Awareness" of the same Report.* ➔







## Partnerships

In order to investigate specific water quality issues, EYDAP often collaborates with Greek Educational and Research Institutions (NKUA, EKEFE Demokritos, Hellenic Atomic Energy Commission, etc.), which are among the European leaders in their field.



**In 2020, a collaboration with the National and Kapodistrian University of Athens** was completed which aimed to investigate the **possible detection of emerging organic pollutants in the reservoirs of EYDAP** (Mornos, Evinos, Marathon, Yliki). A combination of sophisticated "targeted" as well as "non-targeted" analysis techniques was applied to scan the sample for the detection and identification of a wide range of unknown substances (over 70,000 compounds), so far not present in monitoring lists, and the identification of cases of pollutant discharge into the environment that were previously undetectable.

**The results of the collaboration with the National and Kapodistrian University of Athens** constitute the first comprehensive study on the detection of emerging contaminants in reservoir waters intended for drinking water.

This has provided both important evidence of the good chemical status of EYDAP's reservoirs and a list of substances requiring monitoring.

As a follow-up, and in order to prepare EYDAP in time for the developments of the European and Greek legislation on the quality of water for human consumption, **a new contract was signed in 2022 with the Analytical Chemistry Laboratory of the National and Kapodistrian University of Athens**, with the same scope (i.e. specialised analyses), but on samples from the **inlet and outlet of EYDAP's four Water Treatment Plants (WTP)**, in order to obtain data for risk assessment in the part of the water supply system that concerns the treatment.

These data will be used in the risk assessment study of the water supply system from intake to metering required by the forthcoming legislation and will contribute to the optimisation of EYDAP's water quality monitoring program.

In addition, according to the **new Directive (EU) 2020/2184/16-12-2020 (on "water quality for human consumption")**, a risk assessment for the presence of somatic coliphages in EYDAP's untreated water is required to check the effectiveness of the treatment processes against microbiological risks.

Taking into account the above, regarding regulatory compliance for risk assessment, but also to enhance EYDAP's water monitoring program with advanced cutting-edge technologies and in the field of **biosecurity**, in 2022, a pilot collaboration with an external partner, entitled "Microbiome monitoring and detection of coliphage viruses in untreated EYDAP water" was carried out.

### The following conclusions emerged from this project:

- Already in the 1st treatment stage (prechlorination) and even before the stages of aggregation, sedimentation, filtration follow, the microbial presence (variety and quantity) is significantly reduced.
- The absence of somatic coliphages in EYDAP's untreated water was confirmed.
- Metagenomic analysis is an additional tool to confirm the excellent treatment applied by EYDAP to water for human consumption..

## Review Of Directive 98/83/EU on the Quality of Water intended for Human Consumption

Due to their expertise and experience, EYDAP executives participated institutionally in the consultation process that had started in February 2018 and was completed in 2020 with the adoption of EU Directive 2020/2184. Following the above project, by Decision A1b/G.P.30320/27.07.2021 of the Minister of Health, EYDAP executives during 2022 actively participated in the Working Group of the Ministry of Health for the harmonization of the EU Directive 2020/2184 on the quality of water for human consumption (recast).

In December 2022, the final draft CMD was produced for signature by the relevant Ministers.

## Certifications

The Galatsi and Acharnes Chemical Laboratories and the Microbiological Laboratory are accredited according to **ELOT EN ISO 17025** already since 2005, by the National Accreditation System (ESYD), for the performance of tests for the determination of chemical and microbiological parameters in untreated and drinking water (Certificate No. 192).

During 2022, in order to maintain accreditation, ESYD's inspection carried out on 3/12/2021 was completed and appropriate preparations were made for a new scope extension of accreditation, which was considered during the ESYD inspection on 31/01/2023 (surveillance and scope extension inspection).

As assessed by the evaluators, the performance of the Water Quality Control Service's laboratories is highly satisfactory and reflects the high level of its staff and as a result, it was granted:

- **Retention of accreditation**
- **Expanding the Official Scope of Accreditation with new methods**



**EYDAP's water laboratories are now accredited for a total of 79 types of tests/parameters for drinking and surface water, as well as for sampling, 4 more of these in 2022.**

International developments and trends in the field of water analysis are systematically monitored. The continuous development and improvement of their operation is reflected in the continuous expansion of the scope of accreditation of laboratories, i.e. the continuous increase in the number of substances identified using accredited methods.





## Complaint management - consumer information

EYDAP gives particular priority to ensuring a high level of consumer satisfaction.

# 1022

## 24-hours customer service 1022@eydap.gr

For the recording and rapid response to all quality issues that may be reported by consumers.

Detailed reference is made in the section "Secure Customer Service - Affordable Tariff" of the same Report.. ➔

In 2022, there was no incident of a consumer request not being met nor an incident of a fine or compensation being imposed for water quality issues.



## Consumer information

EYDAP systematically ensures that consumers are informed about the quality of water in the following ways:

On an annual basis, the average values of all the parameters identified are calculated. These values are posted on the Company's website so that they can be accessed by all interested parties..

Responds in writing by providing up-to-date information on water quality to any consumer request. In the majority of these cases, the responses include reports of sample results taken from taps within the properties of the stakeholders.

The water quality data of EYDAP's water supply network are systematically sent to the Ministry of Health. Data for the three-year period 2017 - 2019 was sent to the Ministry of Health in early 2020, while data for the three-year period 2020 - 2022 is being collected, has been requested and will be sent to the Ministry of Health within March 2023.





## Compliance with contractual obligations with the Greek State

In order to comply with the obligations of the new Contract of Law 4812/2021 between the Greek State, EYDAP Fixed Assets Company and E.YD.A.P. S.A., the periodic sending of data on the quality of water for human consumption to the Ministry of Infrastructure and Transportation has started. Within 2022, the 1st Report of Quality Data of Water for Human Consumption for the 1st & 2nd Quarter of 2022, as well as the untreated water quality data for the year 2022 were sent, while the 2nd report with the remaining data of 2022 will follow within March 2023.

### Performance

As documented by the results

**170,000**  
analyses/year

**on ≈10,000**  
drinking water samples/year

**on ≈2,000**  
untreated water samples/year

EYDAP constantly certifies that Athens' water is of excellent quality and one of the best in Europe.

The results of the analyses certify that the quality of the drinking water of EYDAP meets the legislative requirements of the JMD C1(d)/GP oik.67322/2017 "Quality of water for human consumption" in compliance with the Directive 98/83/EC of the Council of the European Union (as amended and in force).

On an annual basis, internal self-assessment inspections of the individual processes of the Water Quality Control Service are conducted and all functions related to Quality Control are reviewed. This identifies any deviations from established procedures and records opportunities for improvement, which are then planned and implemented.

### Compliance with regulations and voluntary standards

During the reporting period, no incidents of non-compliance with regulations and voluntary rules related to the quality of water supply water and with negative impacts on CONSUMER HEALTH and SAFETY were identified.

*Drinking water quality testing data from EYDAP's water supply network is available on the Company's website [www.eydap.gr](http://www.eydap.gr)*

# Wastewater Network



2022

**95%**  
free of its pollutant load  
returns to the environment

**3,695,000**  
served population



**8,598 km**  
wastewater network



**80%**  
digital imaging of the  
wastewater network

**3 (WTP)**  
wastewater treatment plant



**700,330 m<sup>3</sup> /day**  
average daily treatment  
of effluents



**256,100,000 m<sup>3</sup>/year**  
annual treatment of  
effluents



**Certified laboratories  
by ESYD**

**65,000**  
analysis on  
**11,500** samples

**Inspection** of sewage  
effluents from industrial  
sites



## New Projects Of East Attica



**~400,000**  
inhabitants will be connected to  
the sewerage network



**~48,000 m<sup>3</sup>/day**  
reclaimed water production  
capacity







**~75,000 m<sup>3</sup>/day**  
reclaimed water production  
capacity in 20 years

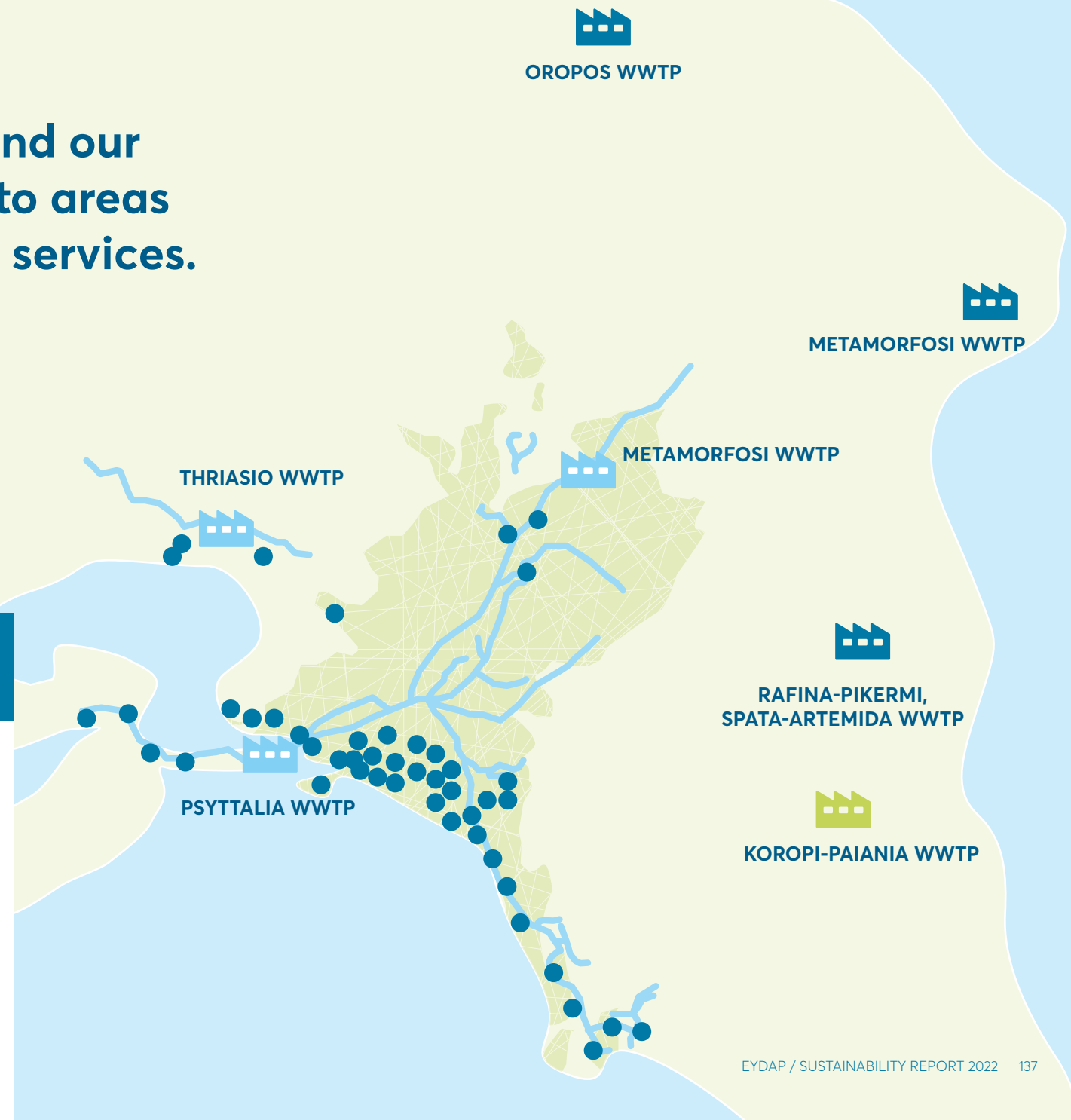
**~16,000 hectares**  
Capacity of irrigation in initial  
phase

**~25,000 hectares**  
Capacity of irrigation in 20  
years

Our goal is to expand our sewerage network to areas that lack sewerage services.

## Sewerage Network System

-  WWTP IN OPERATION BY EYDAP
-  WWTP TO BE CONSTRUCTED & OPERATED FROM THE EYDAP
-  WWTP TO BE CONSTRUCTED BY THE REGION BY THE REGION OF ATTICA (OPERATING ENTITY SEWAGE EYDAP)
-  SEWAGE PUMPING STATION
-  PUMPING STATION CENTRALISED SEWAGE COLLECTOR
-  SECONDARY SEWAGE NETWORK





## MATERIAL TOPIC

### 4.1.4 EYDAP Wastewater Network - Wastewater Collection & Treatment Projects in East Attica

H Attica's Sustainable Development is closely linked to the responsible and effective management of wastewater. EYDAP today, as the largest company in Greece operating in the water cycle, takes care of the collection and treatment of wastewater and returns to the environment treated water free of pollutant load, applying the most modern international practices.



**Psyttalia WWTP**

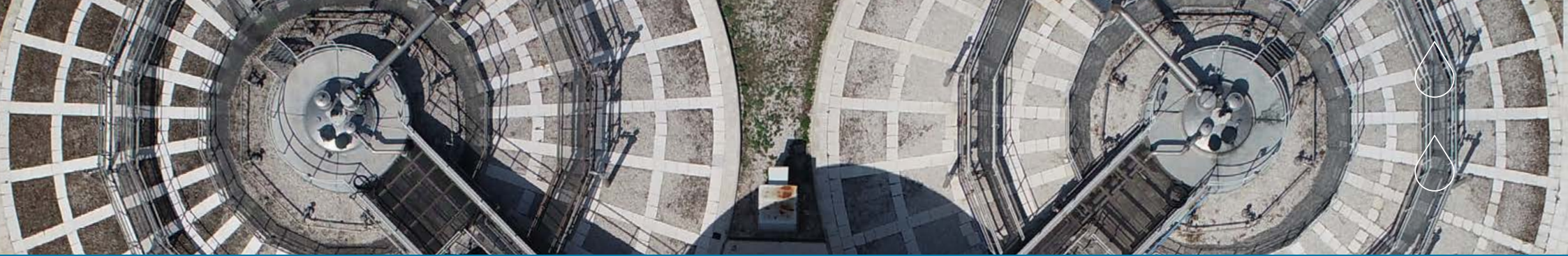


**Metamorphosis WWTP**



**Thriassio WWTP**





**We are committed to a continuous and dynamic presence in this sector, through our undeniable high level of expertise and with the main objective of protecting natural resources, using modern methods of circular economy and the continuous upgrading of the quality of life of citizens.**

EYDAP's operation and especially the disposal and treatment of residential, institutional, factory and other wastewater is based on the regulatory provisions of Greek and European legislation and corporate initiatives.

## Risks

potential risks are very critical and important factors that the Company manages with particular attention through the preparation of a specific Business Plan, being aware of their economic, social and environmental impact. The main risks related to sanitation issues are:

- environmental degradation in areas where there is no sewerage network
- wastewater inflow into properties or escape into the environment (roads, streams) due to overflows or blockages of pipes
- problems in the operation of wastewater treatment plants due to the discharge of untreatable wastewater into the network
- pollution of the marine ecosystem in the event of inadequate treatment of wastewater.
- impact of climate change (extreme weather events, fires, etc.)

The adoption of preventive measures, the revision of operating procedures and the continuous modernisation of systems aims to ensure the uninterrupted and safe operation of the wastewater network and wastewater treatment facilities, while reducing the Company's environmental footprint through the reduction of energy consumption, the strengthening of the circular economy and the reduction of the carbon footprint.



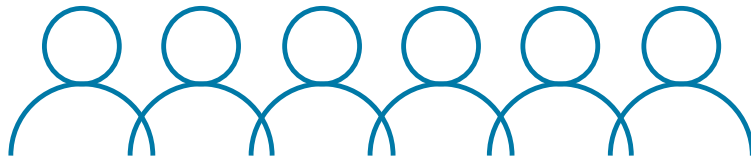


## Our impacts

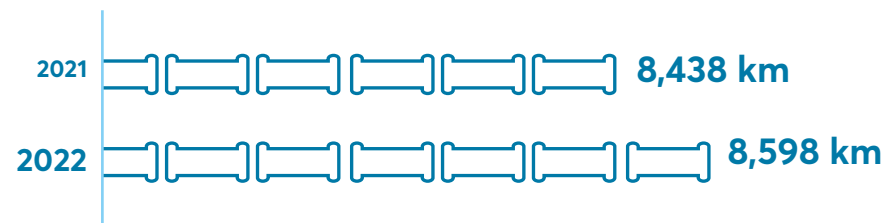
### Sewerage Network

EYDAP is responsible for the construction, operation and maintenance of the sewerage network in its area of competence, as defined by the article 8 of Law 2744/99 as in force today.

The population served is approximately  
**3,695,000 inhabitants.**



The total length of the sewerage network within our  
area of competence



The total length of the sewerage network within our area of competence extends from Agios Stefanos to Salamina and from Varkiza to Mandra.

**Our aim is to expand the network to areas lacking sewerage.**

The term **"sewerage network"** in the area within the EYDAP's area of competence, for which EYDAP is responsible, refers to the sewage pipelines, the all-flow pipelines (the old mixed network in Athens city center), the pumping stations, the delivery pipelines, the overflow shafts and generally any project that aims to collect and transport the sewage to the final recipients.

Pipelines and external branches of sewage systems constructed by third parties are included in the final sewerage network after acceptance by EYDAP.



Attica's sewerage is carried out by rainwater and sewage pipelines. The system is divided (sewage pipes - stormwater pipes), except in the Athens city center area, where the system is all-flowing (common pipelines for stormwater and sewage).

In early 2023, the signing of a Planning Agreement with the Municipality of Athens is expected in order to assign the responsibility for the construction of sewage pipelines of less than 300 mm in cross-section as well as branches (connections) of properties to EYDAP SA. This Planning Contract will have a duration of ten years.

**According to the current legal framework, the responsibility for rainwater drainage and flood protection projects, as well as for the cleaning of drainage shafts, belongs to the Region of Attica and the local municipalities.**

**Sewage pipelines** are usually gravity pipelines, but where necessary there are also pressurized pipelines.

**Attica's sewerage system** includes: 44 pumping stations, mainly along the coastal front of Piraeus and the coast of Saronikos and Salamina, 3 new pumping stations in Thriassio Pedio, 1 pumping station in the Municipality of Stamata, 1 pumping station in Adames, while new pumping stations are constantly being added from the secondary sewerage networks, under the responsibility of the Municipalities, which are received by EYDAP.

EYDAP closely monitors the proximity of its installations, especially the pumping stations, to the natural receptors, in order to intervene on time and prevent cases of environmental pollution from possible overflows.

Wastewater is discharged via the main collectors to the Wastewater Treatment Plants.

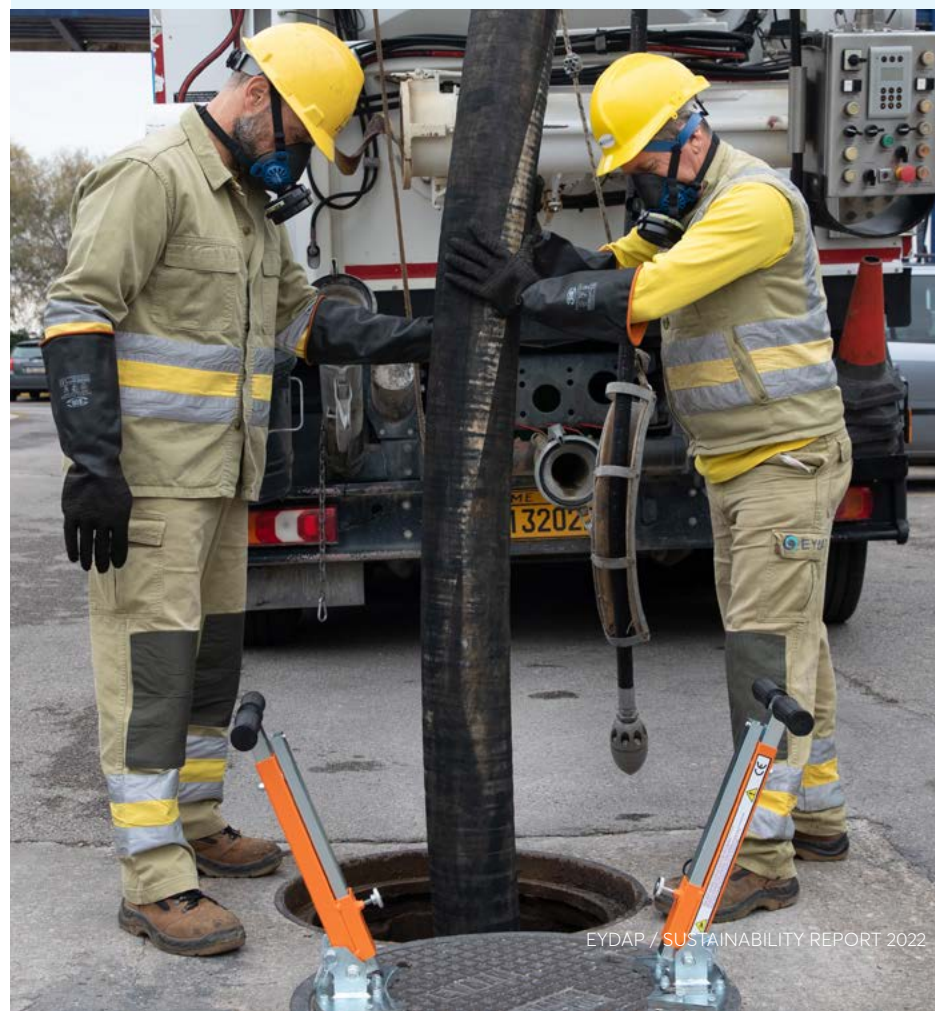


## Sewerage network inspection and maintenance

**Network maintenance and fault restoration is carried out with continuous and immediate interventions, by highly trained personnel and the use of appropriate equipment that is constantly modernized and the extensive use of modern information systems.**

The prevention and effective treatment of problems is achieved through the use of modern equipment and the extensive use of modern information systems.

*More information at [eydap.gr](http://eydap.gr)*



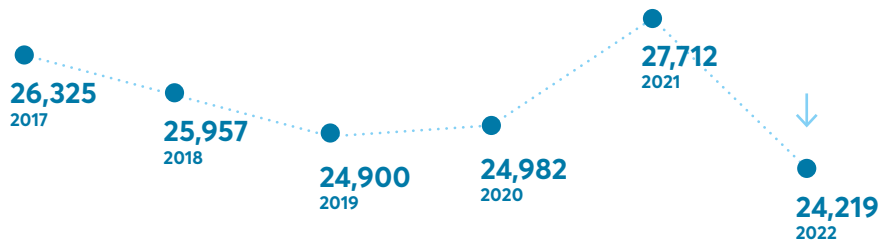


## Monitoring of failures in the sewerage network

Damage to sewerage network pipes is caused by blockages due to the discharge of unfit materials such as rubble, grease and oil and other objects into the network, as well as by the entry of roots from adjacent trees.



### Network breakdowns



## Digital mapping of approximately 80% of the network

which contributes to the rapid response to the problems encountered.

## Continuous modernisation of equipment

In 2022, we received:

**13** suction and high-pressure water tanker trucks from wastewater recycling.

**3** high-pressure water and waste water suction tanker trucks.

## Inspection of sewage effluents from industrial and manufacturing sites

The specific obligations of **professional, industrial and craft activities** to discharge wastewater into the sewerage network in the areas under EYDAP's competence are regulated by the **Special Sewerage Network Operation Regulation** in conjunction with the relevant Common Ministerial Decisions.

EYDAP **authorizes** the companies that produce wastewater from their production activities to legally dispose of it in the sewerage network and **systematically carries out sampling and tests** of the waste entering the network.

**Laboratory analyses of the samples are carried out in our accredited laboratories in Akrokeramos and Metamorphosis.**

**Fines** are imposed if the required limits of the parametric values are exceeded, as defined in the Special Sewerage Network Operating Regulation.

## Development of sewerage projects

In order to ensure the drainage of all areas under EYDAP's competence that are currently deprived of sewerage, EYDAP, in cooperation with the Municipalities, is proceeding with the planning and design of the required sewerage projects in Attica. In this context::

**Construction of sewerage pipelines in certain areas of EYDAP's competence.**  
*In progress*

**Construction of connections to properties and secondary sewerage network with the required manholes in the areas of competence in the North-East and South-East sectors.** *In progress*

**Reconstruction of delivery pipes in the South-Eastern sector.** *In progress*

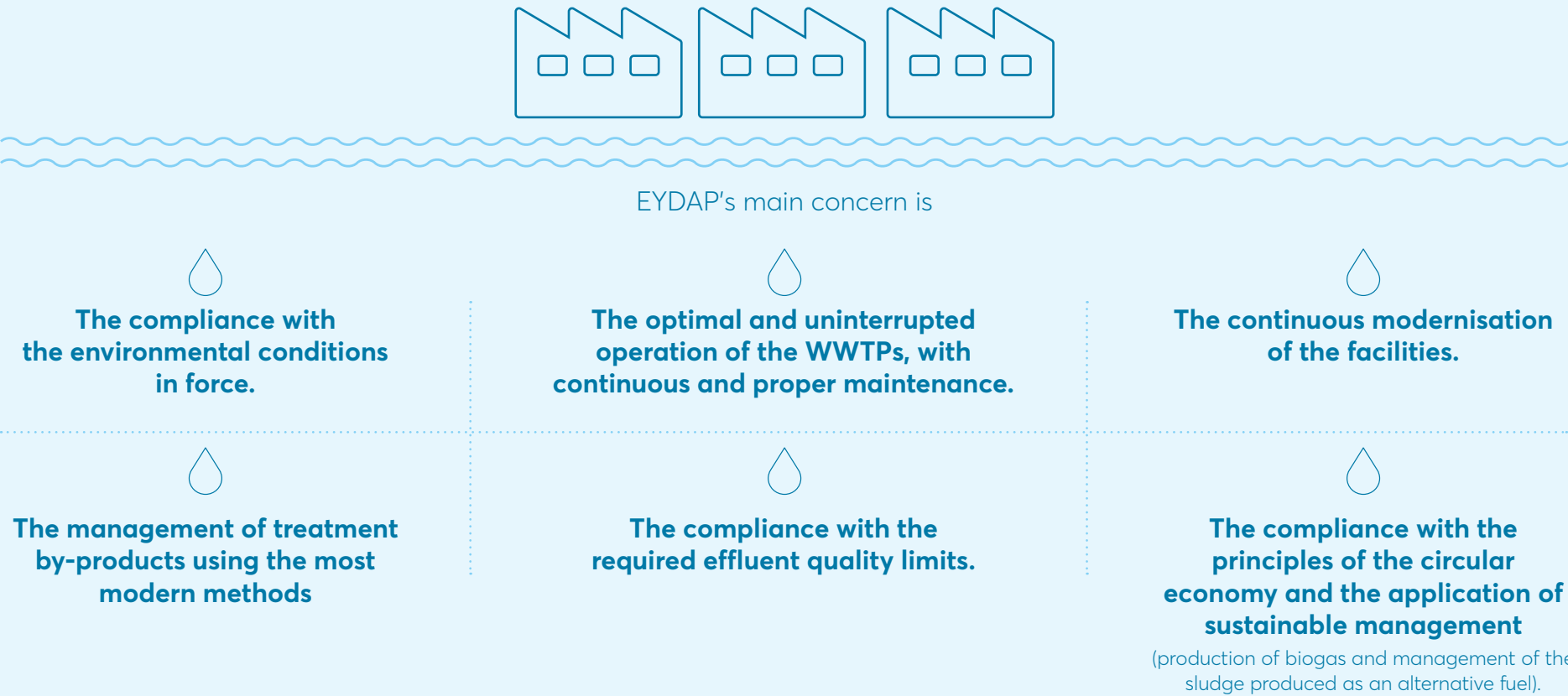
**Reconstruction of sewerage network, manholes and property connections in the South-West and North-West areas of competence.** *In the process of contract signature*

The tendering procedures for the projects are particularly lengthy, due to constant amendments to the law and litigation, with the result that the appointment of the contractor and the signing of the relevant contract takes place after a long period of time - more than a year in many cases - from the publication of the tender documents.



### 3 Wastewater Treatment Plants (3 WWTPs)

Wastewater from the areas within EYDAP's area of competence that currently have a sewerage network is treated at the three Wastewater Treatment Plants (WWTPs) in **Metamorphosis** Attica (Metamorphosis WWTP), **Psyttalia** Island (Psyttalia WWTP) and **Thriassio Field** (Thriassio WWTP).



Detailed reference to this issue in the section 'Circular Economy' of this report. ➔

The published maps of the Ministry of Energy and Environment mention that the Psyttalia, Metamorphosis and Thriassio WWTPs are not located in flood risk areas with a recovery period of 100 years.

# Psyttalia Wastewater Treatment Plant (WWTP)

2022

**245,000,000 m<sup>3</sup>**  
the total amount of incoming wastewater

**670,000 m<sup>3</sup>/day**  
the average incoming wastewater flow

**Treatment capacity**  
(average design flow)  
**1,000,000 m<sup>3</sup>/day**  
of wastewater



One of the largest WWTPs in Europe and worldwide



**95%**

the efficiency of the plant, in terms of  
**removal of the  
total pollutant load  
or more for certain  
pollutants**

Urban wastewater and pre-treated industrial wastewater are discharged into the Psyttalia WWTP::

- The wider area of the Attica basin, except for certain areas where urban wastewater is treated at the Metamorphosis Waste Water Treatment Plant
- The island of Salamina.

**At the Psyttalia WWTP  
biological treatment and drying  
of the dehydrated sludge  
produced, is carried out**

Psyttalia WWTP



## Environmental footprint of Psyttalia WWTP

The energy optimisation of the Psyttalia WWTP and energy saving has been one of the most important objectives of EYDAP. For this reason, the operation and maintenance contracts attempt to make a special contribution in this direction.

*Detailed reference to this issue in the section ' Climate Change Mitigation Strategies ' in this Report ➔*

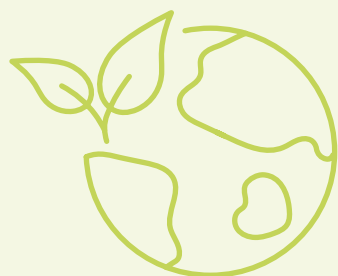
**The sludge treatment process produces biogas, which is used as a fuel in the sludge drying plant instead of natural gas, and any surplus is used as a fuel in machines for the cogeneration of electricity and thermal energy in order to meet the corresponding energy needs of the Facility.**

The dried sludge produced is made available as an alternative fuel to cement industries.

**On average, approximately 40,000 tn are produced annually.**

**The upgrading of the facilities aims at improving the overall operational processes and further improving the energy self-sufficiency of the center by increasing the biogas production.**

*Detailed reference to this issue in the section " Circular Economy " in this Report. ➔*



## Upgrade of Psyttalia WWTP facilities

In the context of upgrading the facilities, further optimizing the operation of the Plant and to ensure full compliance with environmental conditions, the following projects are planned to be implemented within the next 5 years:

- Construction of a building for the temporary storage of pre-treatment product containers at Akrokeramos.
- Equipping and commissioning of the two inactive sublimation channels.
- Improvement of the overflow pipe at Akrokeramos and landscaping.
- Improvement of the collection and treatment of fats and oils in primary sedimentation.
- Anaerobic treatment of fats and oils through the construction of two new digesters

## Wastewater inflow of non-standard urban composition

In the context of addressing incidents related to the inflow of wastewater of non-standard urban composition in the WWTP of Psyttalia, in 2020, an internationally recognized professor of the Faculty of Civil Engineering of the University of Patras was assigned to carry out a research project on **"Collection, Processing and Analysis of Time Series of Qualitative and Quantitative Parameters at the Entrance and Exit of Psyttalia WWTP for the Detection and Probabilistic Modeling of Emergency Charging Incidents"**.

The objective was to understand and quantify the influence of charging emergencies on the smooth operation of the plant. The work was completed in January 2022.







## Environmental conditions

The treatment of the wastewater of the Psyttalia WWTP, in terms of the requirements resulting from the Environmental Conditions (EC), has been, over time, **completely successful**, which is confirmed by the results that are announced and posted annually on the official website of the Ministry Of Environment And Energy, as required by law.

There is, however, a deviation in compliance with the condition relating to the chlorination of the treated effluent (non-compliance with the provisions of the MD No. Eiv221/1965). This is included for the first time in the 2009 renewal of the Decision of the Approval of the Environmental Conditions of the Psyttalia WWTP. It should be noted that neither the studies, nor the corresponding Decisions of the Approval of the Environmental Conditions, nor the construction of the Psyttalia WWTP (A and B Phase) by the Greek State provided for the construction of a chlorination plant.

In this respect, studies by reputable public bodies, universities and scientific institutions show that chlorination of the outbound treated wastewater from the Psyttalia WWTP to the aquatic environment is not advisable. In particular they state:

- A study by the National Technical University on the issue of chlorination of treated wastewater has shown that ***"chlorination of the wastewater of Psyttalia is not advisable but should be avoided"***. This study also showed that the quality of the beaches is of excellent quality.
- **Reports by the Hellenic Center for Marine Research (HCMR), concerning the results of the monitoring of the ecosystems of the inner Saronic Gulf and the Gulf of Elefsina, document that there is no impact on the marine receptor from the operation of the Psyttalia and Thriassio WWTPs.**
- The study of the School of Chemistry of the National Kapodistrian University of Athens, the Laboratory of Analytical Chemistry of the Department of Chemistry regarding the issue of possible chlorine addition to the treated wastewater of the Psyttalia WWTP, concluded that: ***"the addition of the extra chlorination stage is not proposed as a strategy for the treatment of the outbound wastewater of the Psyttalia WWTP before its discharge into the aquatic ecosystem"***.

Considering all the above, EYDAP has submitted a request to the Ministry of Environment & Energy for the removal, from the Approval of the Environmental Conditions of the WWTP of Psyttalia, of the clause concerning the obligation to add chlorine to the treated wastewater of the WWTP of Psyttalia, in order to formally eliminate this apparently regulatory deviation.



# Metamorphosis Wastewater Treatment Plant (WWTP)

2022

**8,800,000 m<sup>3</sup>**

the total amount of incoming wastewater

4,600,000 m<sup>3</sup> wastewater and 4,200,000 m<sup>3</sup> sewage

**24,000 m<sup>3</sup>/ημέρα**

the average incoming wastewater flow

12,500 m<sup>3</sup>/day of wastewater and 11,500 m<sup>3</sup>/day of sewage

**Treatment capacity**

(average design flow)

**44,000 m<sup>3</sup>/day of wastewater**

20,000 m<sup>3</sup>/day of urban wastewater and

24,000 m<sup>3</sup>/day of urban sewage



**over 99%**  
the pollutant load removal rate,  
in terms of organic load

The final recipient of the effluent of the WWTP is the Pyrna stream.

It is the oldest wastewater treatment plant and is a reception and co-treatment facility of

- urban wastewater through a network of sewage collectors and
- domestic sewage from areas of Attica that lack a sewerage network

In addition, pre-treated biodegradable industrial waste is disposed of in the Industrial Waste Sump of the Metamorphosis WWTP, which ends up for treatment in the Psytalia WWTP.

**At the Metamorphosis WWTP combined treatment of municipal wastewater and sewage is carried out through chlorination of the treated effluent and treatment and dehydration of the sludge.**



## Environmental footprint of the Metamorphosis WWTP

### The dehydrated sludge is transported to the Psytalia WWTP for drying

Detailed reference to this issue in the section "Circular Economy". ➔

#### Use of Biogas as energy resource

The use of the produced biogas, which is a renewable energy source, for heating the sludge of the digestion tanks and the buildings of the Metamorphosis WWTP, leads to the independence from the use of fossil fuels (e.g. oil) and the reduction of electricity consumption for heating buildings. The total energy savings from heating buildings are estimated at 63 MWh/year.

#### Our goal is to optimise its operation with:

- projects to **improve the existing treatment facilities** and the facilities at the **Tanker Truck Discharge Area**
- implementation of the deodorisation projects, which are particularly important for the area and its inhabitants, in **addition to the existing deodorisation projects**
- projects for the **treatment** of biodegradable industrial waste.
- projects for **further energy recovery** of the biogas produced through the installation of a combined heat and power plant. The implementation period of the projects is estimated at 2 years from the signing of the Contract, i.e. in 2026

#### Monitoring system

As part of the monitoring system and the faster service of the tanker trucks transporting urban and industrial wastewater to the Metamorphosis WWTP, an electronic control system (e-pass) was installed in 2018. Vehicles enter the Metamorphosis WWTP using a prepaid card.

In 2023, the installation of an integrated quality control system for all urban and industrial sewage disposed at the Metamorphosis WWTP will be put out to tender, in order to avoid the disposal of unsuitable sewage and to protect the biological processes of the plant.





# Thriasio Pedio Wastewater Treatment Plant (WWTP)

2022

**2,300,000 m<sup>3</sup>**

the total amount of incoming wastewater

**6,330 m<sup>3</sup>/day**

average flow of incoming wastewater

**Treatment capacity**  
(average design flow) of  
**21,000 m<sup>3</sup>/day** of  
wastewater.



**The Thriasio Pedio WWTP has been operating since 2012 and is the most modern WWTP.**

**>95%**  
removal of the  
pollutant load

It is an integrated solution to a chronic problem of the inhabitants of the Thriasio Pedio area, thus contributing to the restoration of the balance of the ecosystem of the Gulf of Elefsina, which has been identified as a sensitive receptor.

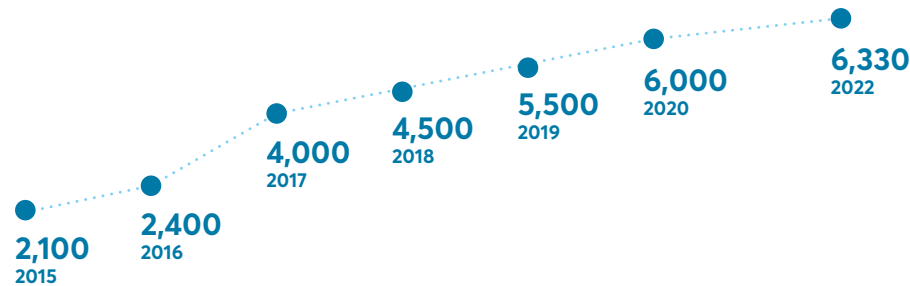
The Thriasio Pedio WWTP serves the areas of Elefsina, Aspropyrgos, Mandra and Magoula.

**Tertiary treatment is carried out at the Thriasio Pedio WWTP.**





Measurement of daily incoming flow at the Thriassio WWTP (m<sup>3</sup>/day)



Following the actions taken by EYDAP in the Thriassio area, a continuous increase in the influent flow to the WWTP is observed.



**Pipelines for the wastewater intake** for treatment at the Thriassio WWTP, **130 km** long, and **3 pumping stations** were constructed as part of the sewerage works in the Thriassio area to comply with Directive 91/271/EEC on urban wastewater treatment.



## Increase in property connections – provision of financial incentives

EYDAP, in order to increase the number of property connections

- Implemented a program to provide financial incentives to residents of the areas whose wastewater is expected to be sent to the Thriassio WWTP. This programme was implemented from mid-2014 until 30.6.2019
- Strengthened, even with financial incentives, the construction of connections in the Municipalities of Elefsina, Mandra-Eidyllia and Aspropyrgos (2017 and 2018).

**As a result of the above actions, combined with parallel actions by local Municipalities for the construction of connections, the service rate of residents increased significantly, estimated at 93.8% (second half of 2022).**

## Environmental footprint of the Thriassio WWTP

The operation of the Thriassio WWTP will lead to the elimination of cesspools and the eventual discharge of untreated wastewater into the environment. The dewatered sludge produced in the WWTP is transported for thermal drying to the Psytalia WWTP.



**The total treated wastewater outflow for the year cumulatively for all 3 WWTPs is considered equal to the inflow.**



## Laboratories for chemical analysis of wastewater

In our laboratories, **tests on samples of wastewater, waste and sludge** are carried out, coming from:

- the WWTPs
- Pipelines of the sewerage network
- Businesses-organisations, connected to the network
- tanker trucks transporting sewage sludge to the Metamorphosis WWTP
- properties in which faults occur
- the Environmental Inspectors on matters within their competence relating to pollution of the aquatic environment

In the case of businesses-organisations, the parameters that are examined, their limits and the frequency of sampling are determined by the relevant legislative framework and the corresponding environmental conditions, in the case of the WWTPs.

**2022**

**11,500**

the number of samples analysed by the laboratories of the Sewage Laboratory Analysis Department

**65,000**

corresponding analyses

### Results of industrial wastewater testing through sampling at EYDAP laboratories

Taking into account the results of the inspections and the large number of related businesses (over 10,000), it appears that, in general, businesses comply with the requirements of the legislation. The penalties applied are minimal.

For the years up to 2020, those involved 10 companies.  
In 2021 the penalties applied are 12.



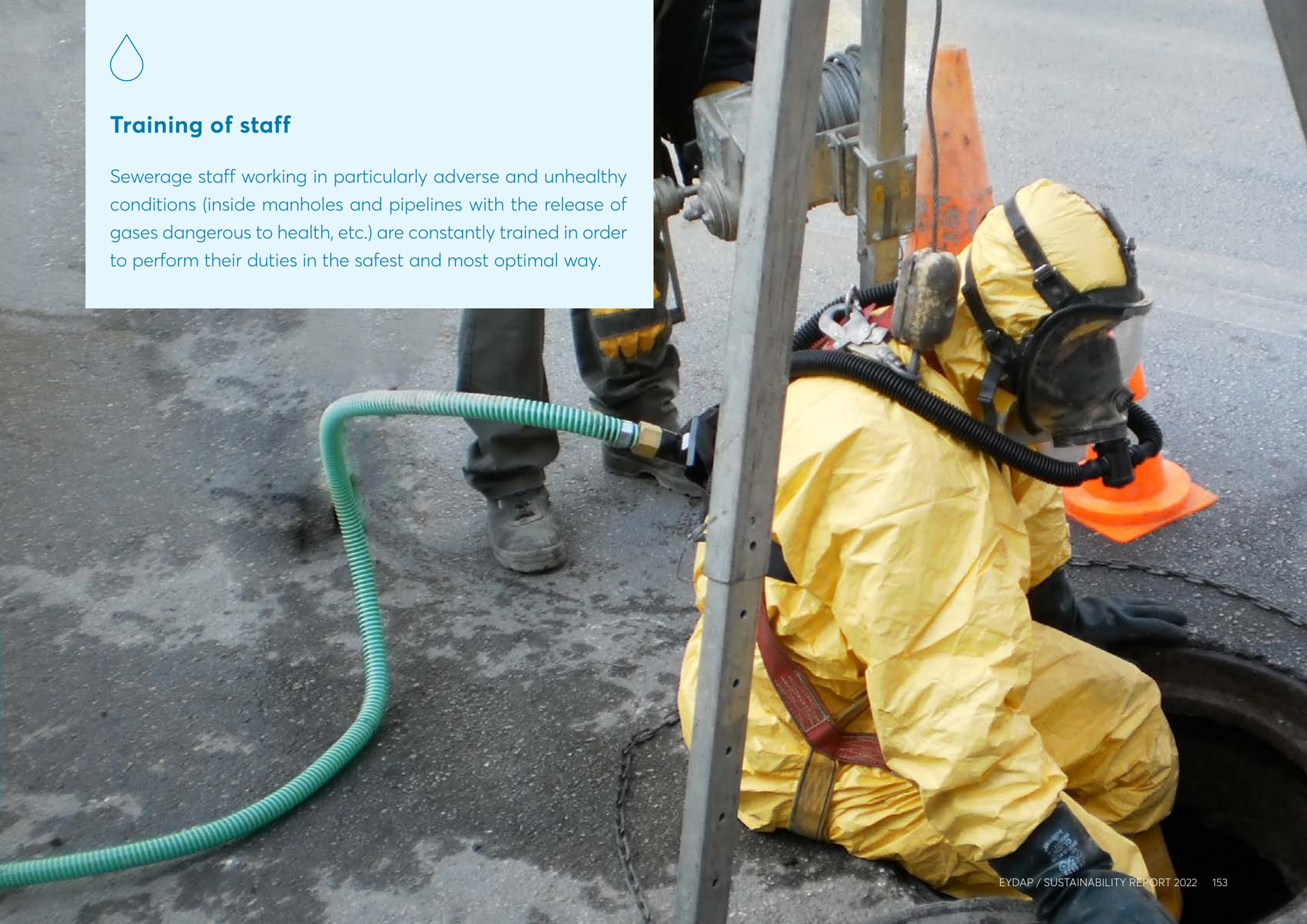
**Our laboratories are accredited by the Hellenic Accreditation System (ESYD) in accordance with ISO 17025 - Certificate numbers 862-3 (Akrokeramos Sewage Laboratory) and 856-4 (Metamorphosis Laboratories).**





## Training of staff

Sewerage staff working in particularly adverse and unhealthy conditions (inside manholes and pipelines with the release of gases dangerous to health, etc.) are constantly trained in order to perform their duties in the safest and most optimal way.





## Assessment of the effectiveness of the operation and management of the sewage system

This is done by developing the following applications and practices, some of which are important innovations in the operation of the system:

### Monitoring of the marine ecosystem of the Saronic Gulf and the Gulf of Elefsina and evaluation of the results, in collaboration with an independent research organisation (Hellenic Centre For Marine Research – HCMR).

Monitoring of the quality of the ecosystem of the Inner Saronic Gulf, the Gulf of Elefsina and the Keratsini Bay, as affected by the Psyttalia Wastewater Treatment Plant and the Thriasio Pedio Wastewater Treatment Plant, by the Hellenic Centre for Marine Research (HCMR) through contracts with EYDAP.

This monitoring started in 2005 and continues to date. The results show a continuous improvement of the ecological status of the Inner Saronic Gulf and the Gulf of Elefsina, especially at the discharge points of the WWTPs.

*Detailed reference to this issue in the section "Protection of the Marine Environment" of the same report . ➔*

## Publication of the results of wastewater treatment in the National Database of the Ministry of Environment, Energy and Climate Change.

Quantitative and qualitative characteristics of the inputs and outputs of wastewater treatment plants are published in the electronic database <http://astikalimata.ypeka.gr/default.aspx> of the Special Secretariat for Water.

The characteristics published are as follows:

- Average annual incoming flow
- Annual quantity of dried sludge produced (tn).
- Annual quantity of Dry Solids – DS (tn).
- Daily values (mg/l) of the parameters: BOD<sub>5</sub>, COD, TSS, T-N, NH<sub>4</sub>-N, T-P

Access to the database is free for all citizens.

**Over time, as can be seen from the results posted in the electronic database of the Ministry of Environment and Energy, the quality of the effluent of EYDAP's Wastewater Treatment Plants is always within the limits set by the approved Environmental Conditions of their operation.**

## Monitoring of inputs and outflows in WWTPS by continuous sampling and microbiological analysis at EYDAP laboratories.

Systematic sampling of wastewater, as required and in accordance with the legislation in force, at the entrance and exit of the WWTPs, as well as at intermediate stages of treatment, for chemical and microbiological analyses.

The results of the analyses confirm that the limits set by the environmental conditions of the WWTPs are respected.





## Information systems use

EYDAP's high requirements in terms of information systems, led the Company to the continuous improvement of the existing IT applications of the Sewerage Department and the installation of new ones.



## Overflows

Wastewater overflow due to heavy rainfall is allowed by a relevant article (clause d.5 par. 5.2, 5.3) of the environmental conditions of operation of the Psyttalia WWTP. Based on the data on wastewater flows to be treated at the Psyttalia WWTP and on the capacity of the pumping station at the Akrokeramos entrance, it is estimated that the overflow in 2022, due to flooding, was 2,021,222 m<sup>3</sup>.



## Circular economy - Actions

*Detailed reference to this topic in the "Circular Economy" and "Climate Change Mitigation Strategy" same report* ➔ ➔



## Social assistance initiatives

*Detailed reference to the section "Local Community- Environmental awareness" of the same Report.* ➔



## Actions under planning contracts

In cases where the Municipalities are unable to construct the secondary sewage pipes, EYDAP undertakes their construction and the construction of the property connections, following the signing of a planning contract with the Municipality concerned.

In 2022, a planning contract was signed with the Municipality of Dionysos for the construction of secondary network pipelines and connections to properties in the area of **Agios Stefanos, Pefkofita and Rapentosa**.

## Compliance with regulations and voluntary codes

During the reporting period, there were no incidents of non-compliance with regulations and voluntary codes related to the impact of EYDAP services on the health and safety of citizens.

## EYDAP's planning for sewerage in areas of East Attica

- With a view to
- **environmental protection**
  - **sustainable development**
  - **protection of public health**

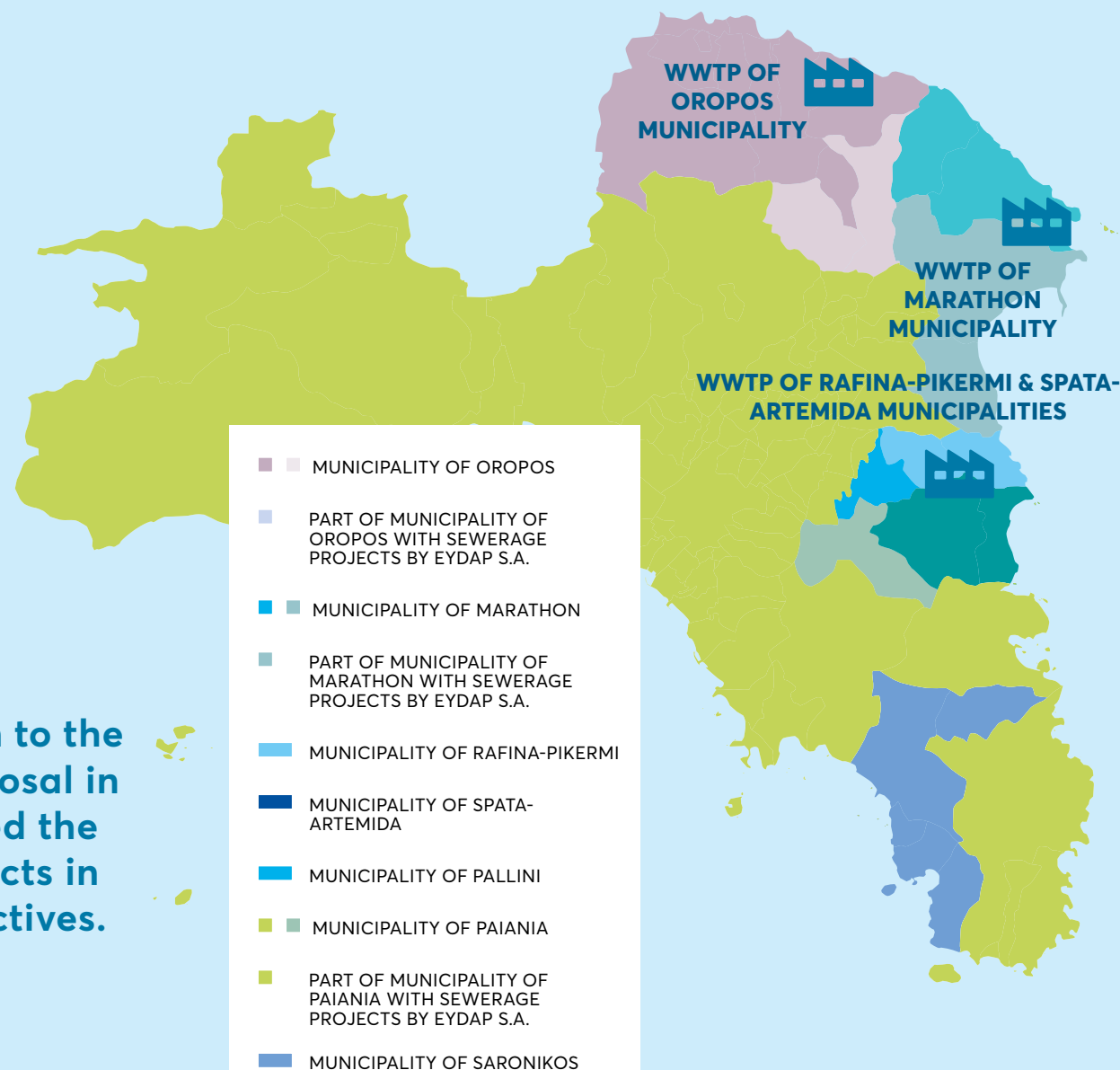
with direct and potential effects on the

- **environment**
- **local community**

*indirectly on*

- **economic development**
- **cultural development**

**EYDAP, giving a definitive solution to the problem of urban wastewater disposal in the East Attica region, has included the implementation of sewerage projects in East Attica in its operational objectives.**



## Our impacts

As the company responsible for the provision of water supply and sewerage services in the Attica region, EYDAP SA has taken substantial action to solve the problem of non-integrated wastewater management, which for many years has led to environmental degradation, sub-optimal management of the valuable resource of water and the imposition of fines for non-compliance with European Directive 91/271EEC.

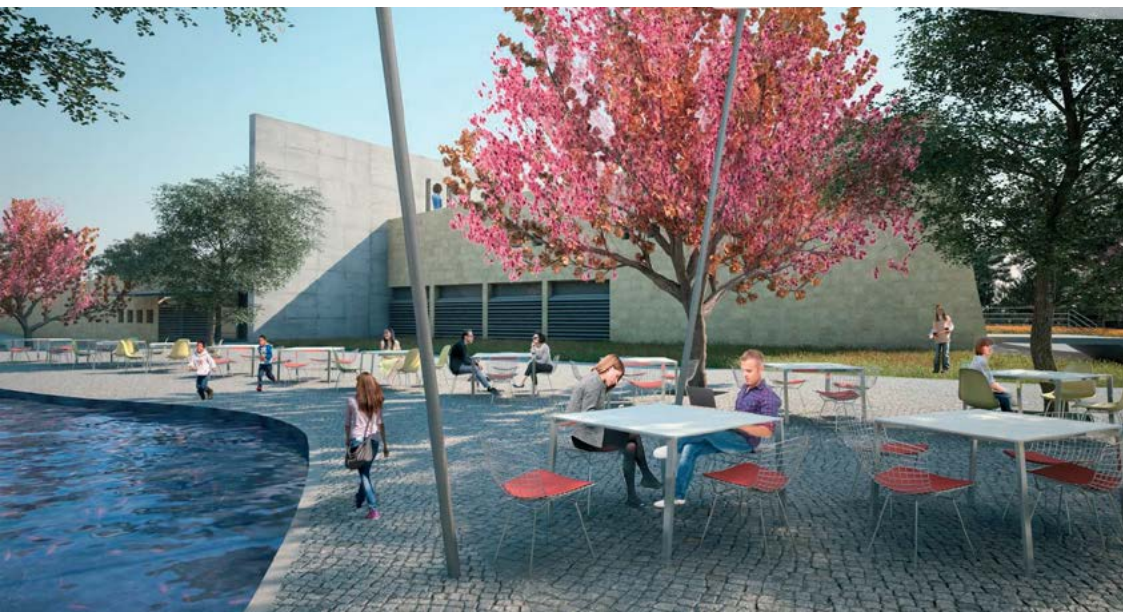
**EYDAP's planning for these important sewerage projects aims both at the integrated management of the region's wastewater and at the reuse of the treated effluents to ensure maximum environmental benefit.**

To this end, the Wastewater Treatment Plants (WWTPs) to be built have been designed to operate with state-of-the-art technology, ensuring the reuse of the treated effluents, in full compliance with the current institutional framework for reuse.

EYDAP has developed the special website [katharonero.eydap.gr](https://katharonero.eydap.gr), under the corporate website [www.eydap.gr](https://www.eydap.gr), for the continuous information of citizens about the important Sewerage Projects of Eastern Attica and the environmental benefits of the projects.

The completion of the sewerage projects in East Attica, in addition to regulatory compliance with Directive 91/271/EEC, will be a factor in ensuring the sustainability of the precious resource of water, upgrading the marine environment and the aquifer and protecting the health of residents, thus contributing to the achievement of the Sustainable Development Goals as defined by the UN.

An Environmental Awareness and Information Center will be operating in the premises of the Municipalities of Rafina-Pikermi and Spata-Artemis, which will implement pilot programs for the optimal use of reclaimed water as well as environmental information and education activities.





## Sewerage works in Eastern Attica



<p><b>1.</b></p> <p>Collection, Treatment of urban waste water of the Municipalities of Rafina-Pikermi and Spata-Artemida and Reuse-Disposal of treated effluents</p>	<p><b>2.</b></p> <p>Collection, Treatment of urban wastewater of the Municipality of Marathon and Disposal Reuse of treated effluents</p>	<p><b>3.</b></p> <p>Construction of sewage works in areas of the Municipality of Pallini</p>	<p><b>4.</b></p> <p>Construction of a sewerage network for the area of Glyka Nera in the Municipality of Paiania</p>	<p><b>5.</b></p> <p>Collection, Treatment of urban wastewater from the coastal zone of the Municipality of Saronikos and the Municipality of Kropia and Reuse-Disposal of treated effluents</p>
<p><b>6.</b></p> <p>Sewage drainage in the area of Kitsi of the Municipality of Kropia.</p>	<p><b>7.</b></p> <p>Sewage drainage of the areas of Leontarion-Kantza, Kato Balanas and Ag. Nikolaos of the Municipality of Pallini</p>	<p><b>8.</b></p> <p>Sewage drainage of the southern part of the Municipal Unit of Artemis.</p>	<p><b>9.</b></p> <p>Sewerage, wastewater treatment and disposal-reuse of treated effluents in the Municipality of Oropos</p>	<p><b>10.</b></p> <p>Re-use of treated effluents from the Wastewater Treatment Plants (WWTPs) of East Attica</p>
<p><b>11.</b></p> <p>Management, final treatment and utilisation/ disposal of the biosolids produced by the East Attica WWTPs</p>	<p><b>12.</b></p> <p>Construction of a sewerage network in the settlement of Daou Penteli</p>	<p><b>13.</b></p> <p>Construction of a sewerage network in the settlements of Grammatiko, Ano Souli, Kaletzi and Agios Panteleimon (part of the settlement) of the Municipality of Marathon</p>	<p><b>14.</b></p> <p>Sewerage of the settlement of Varnavas, Municipality of Marathon.</p>	<p><b>15.</b></p> <p>Utilisation of water from Hadrian's Aqueduct for the irrigation of green areas in the municipality of Halandri</p>



## Environmental benefits from the implementation of the projects

**~ 400,000 inhabitants**  
of East Attica will be connected to the  
sewerage network

in the next few years, according to the plan

**8,800,000 m<sup>3</sup>/year**  
annual production capacity of  
reclaimed water for the irrigation  
season (April-September) for the  
construction phase of the projects

while for the 20-year period (2040)  
the corresponding capacity may be  
increased to 14,000,000 m<sup>3</sup>/year..

**~ 48,000 m<sup>3</sup>/day**  
reclaimed water  
production capacity

of the future Wastewater Treatment  
Plants (WWTPs) to be operated by  
EYDAP S.A. in East Attica (Rafina-  
Pikermi & Artemida-Spata WWTP,  
Marathon WWTP, Koropi-Paiania  
WWTP).

This capacity can be  
**increased in 20 years (2040)**  
with the construction of the necessary  
expansion projects of the WWTPs to  
**75.000 m<sup>3</sup>/day.**

On the assumption that the annual irrigation needs of the  
water in cultivated areas adjacent to the WWTPs are in  
the range of 500-600 stremmas/year - as recorded in the  
"General Plan for the Reuse of the treated effluents of the  
WWTPs of Eastern Attica" (EYDAP S.A., 2016) -

**it is possible to irrigate in the initial  
phase about 16,000 stremmas of  
rable land, while in 20 years (2040) about  
25,000 stremmas may be irrigated.**

From the conclusions that will be drawn from the updating of the above Reuse Master Plan of the East Attica WWTPs and from the preparation of a Sustainability Study of the "Management Body for Reclaimed Water of East Attica Region" in cooperation with the Jaspers Group of the EU, the relevant projects that will be proposed to be launched in the next period for the unlimited irrigation of agricultural land in East Attica will be specified and then the necessary technical studies will be prepared.



EYDAP in cooperation with the Agricultural University of Athens developed a pilot application of irrigation with treated effluents in an experimental field of the AUA in the area of Mesogia.

During the pilot application in cooperation with the Agricultural University of Athens for the use of treated effluents,

### 5,000 analyses

were carried out to determine the physico-chemical properties of the soils and

### 1,000 analyses

to determine the biometric and biochemical characteristics of plant tissues for the irrigation of vine and olive crops.



**The conclusions after monitoring one irrigation season of this application were particularly encouraging as they showed that irrigation with treated effluents with the strict quality characteristics required by the legislation was considered safe and recommended, with no indications to prevent long-term use.**

The cooperation between EYDAP and the Agricultural University of Athens is to be continued with corresponding pilot and research projects as part of the company's strategy to develop the possibility of irrigation through the reuse of treated effluents.



## Protection of the water resource

The reuse of treated effluents from the WWTPs is a strategic choice for EYDAP in the design and implementation of its projects with a significant impact on the purification and enrichment of the groundwater aquifer and the conservation of the valuable resource of water.

## Reducing the energy footprint of projects

**The significant reduction of GHG emissions in the region is valued as a major result of the implementation and operation of the projects.**

Provision has been made for:

### Reduction of energy consumption

through the application of new technologies and high-level automation systems, allowing for detailed control and optimal regulation of processes, with a **positive effect on the resulting operating costs**. The design of the WWTPs provides for the possibility of regulating the operation of the basic equipment and the continuous monitoring of the operation through a modern remote control - remote management system (SCADA) in order to reduce energy consumption.

### Use of RES

to cover part of the energy consumption of the Rafina-Pikermi and Spata-Artemida WWTPs

### The utilization of the produced biogas

### The installation of photovoltaic systems on the free surfaces of the WWTP.

### The installation of small hydroelectric power plants

in the pipelines for the disposal of treated effluents where there is the possibility of energy recovery (Small Hydroelectric Power Plant at the Marathon WWTP)

With the full development of the operation of the future WWTPs in East Attica at the capacity levels of their construction (WWTP of Rafina-Pikermi & Artemida-Spata WWTP, WWTP of Marathon & Koropi-Paiania) and in combination with the above energy saving measures, a **significant reduction of greenhouse gases (GHG) of 20,000 tn CO2/year can be achieved**, compared to the existing situation, i.e. compared to the management of wastewater with private septic/absorption trench systems and the transfer of the sewage to the Metamorphosis WWTP for co-treatment with the municipal wastewater.

## Rehabilitation of underground aquifer

It has been established by the Water Catchment Management Plans (Directive 2000/60), by studies of EYDAP and other bodies that the underground aquifers in the Central Mesogeia region in the area of the Koropi - Paiania WWTP are locally under intense exploitation and exhibit a pronounced drop in water level, water salinization phenomena and nitrate pollution.

EYDAP's projects in the area (Wastewater Treatment Plants, reuse projects, aquifer enrichment projects) are designed to protect and upgrade the underground aquifers.

In particular, the operation of the sewerage and urban wastewater treatment projects in the East Attica region will **drastically reduce the use of cesspools**, most of which are absorptive and whose operation has so far resulted in a significant pollutant load to groundwater.

The possibility of reusing the treated effluent for irrigation will reduce the pumping from the underground aquifer and **thus reduce the risk of groundwater salinization**.

According to the strategic choice of EYDAP SA for the development of water reuse in East Attica, the treated effluents of the Koropi-Paiania WWTP will be reused both for the irrigation of crops and peri-urban green areas (irrigation of communal municipal areas) and for the enrichment of the groundwater aquifer either through existing wells or through boreholes.

## Ecosystem upgrading

Detailed reference to this issue in the section "Protection of Biodiversity". ➔



Western front of the construction of a tunnel for the WWTP of Rafina - Pikermi - Spata - Artemida pipeline crossing



Inner tunnel of the WWTP of Rafina - Pikermi - Spata - Artemida pipeline crossing, excavation.



Western front of the construction of a tunnel for the WWTP of Rafina - Pikermi - Spata - Artemida pipeline crossing

## The strategy for executing the projects

EYDAP, in the context of the actions for the speedy operation of the sewerage projects in East Attica and the avoidance of problems and delays resulting from the dispersion of the responsibilities for the construction of the sewerage projects

**adopts** a holistic approach to the construction of all individual parts of the projects

**undertakes** the simultaneous construction of the secondary sewerage network and the corresponding external branches to connect the properties, the responsibility for the construction of which, under existing legislation, belongs to the municipalities

**plans** actions, in cooperation with the municipalities involved, to speed up the connection of properties to the sewerage network with the completion of the construction of the projects

**establishes**, in cooperation with the Municipalities, service offices for property owners in the respective areas to provide information and receive applications - with the required documents - for the construction of external branches to connect their properties to the sewerage network of EYDAP, which is in the process of construction

Public service offices are already operating in the Municipalities of Paiania, Rafina-Pikermi and Pallini, while in June 2022 a public service office will also operate in the Municipality of Marathon in order to facilitate the process of connecting properties to the sewerage network.

A necessary element for the execution of the projects in an environmentally sound manner is the management of the quantities of waste and waste products generated during the construction of the projects.

## D. Progress of the works

In 2022, significant progress was made in the implementation of the sewerage projects in East Attica.

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**D1. "Collection, Treatment of urban wastewater of the Municipalities of Rafina-Pikermi and Spata-Artemida and Reuse-Disposal of treated effluents"**

*Stage: Construction*

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**D2. "Collection, Treatment of Urban Wastewater of the Municipality of Marathon and Disposal-Reuse of treated effluents".**

*Stage: Construction*

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**D3. "Construction of wastewater drainage projects in areas of the Municipality of Pallini"**

*Stage: Construction*

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**D4. "Construction of a sewerage system for the area of Glyka Nera in the Municipality of Paiania"**

*Stage: Contractor discount*

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**"Collection and treatment of urban wastewater from the coastal zone of the Municipality of Saronikos and the Municipality of Kropia and Reuse - Disposal of treated effluents"**

*Stage: Study*

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**D6. "Sewage drainage of the Kitsi area of the Municipality of Kropia"**

*Stage: Study*

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**D7. "Sewage drainage of the areas of Leontarion-Kantza, Kato Balanas and Ag. Nikolaos of the Municipality of Pallini, with the Paiania-Koropi WWTP as the recipient"**

*Stage: Study*

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**D8. "Sewage drainage of the southern part of the Municipal Unit of Artemida"**

*Stage: Study*

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**D9. "Sewerage, wastewater treatment of the Municipality of Oropos and disposal of reuse of treated effluents"**

*Stage:*

*1.Approval of Financing/Construction for the project Kapandriti, Afidnes, Polydendri and Mikrochori, Chalkoutsis, Nea Palatia, Oropos.*

*2.Procedure for the issuance of the Decision of Approval of Environmental Conditions for the project for the settlements of Avlonas, Markopoulo, Chalkoutsis, Nea Palatia of Oropos.*

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**D10. "Re-use of treated effluents of East Attica Wastewater Treatment Plants (WWTP)"**

*Stage: Feasibility Study/Economic Viability Study*

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**D11. "Management, final treatment and utilisation/disposal of the biosolids produced by the East Attica WWTPs"**

*At the initial stage of maturity*

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**D12. "Construction of a sewerage network in the settlement of Daou Penteli, Municipality of Penteli"**

*Stage: Approval of Financing*

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**D13. "Construction of a sewerage network for the settlements of Grammatiko, Ano Souli, Kaletzi and Agios Panteleimon (part of the settlement) of the Municipality of Marathon"**

*Stage: Approval of Financing*

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**D14. "Sewerage of the settlement of Varnavas, Municipality of Marathon"**

*Stage: Approval of Financing /Study*

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**D15. "Utilization of water from Hadrian's Aqueduct for the irrigation of green areas of the municipality of Chalandri"**

*Stage: Construction tender*

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*A detailed report on the progress of the works is available on the dedicated website [katharonero.eydap.gr/exelixa-ergwn/](http://katharonero.eydap.gr/exelixa-ergwn/).*



## MATERIAL TOPIC

### 4.1.5 Employee Health & Safety

For EYDAP, in the context of Sustainable Development and the protection of Human Rights, ensuring the physical and mental health of its human resources is a long-standing moral commitment, as well as an integral part of its general policy, in accordance with the most recent Health and Safety Policy Statement of EYDAP, which has been strictly followed since 2014.

Moreover, being explicitly bound by international commitments, EYDAP makes every effort to ensure safe conditions in the workplace, while following a vertically integrated strategy for the protection of its employees, providing them, among other things, with full health coverage, through a self-sufficient Service, which is staffed by doctors and paramedical personnel of various specialties. In the context of the above strategy, the company has also adopted and implements a policy to combat violence and harassment at work, in order to ensure, by all possible means, not only the physical but also the mental health of its employees.





## Our impacts

### Internal Protection & Prevention Department of EYDAP (IPPD)

The Employee Health & Safety Management System is determined by the regulatory provisions and internal policies and regulations as formulated after the identification of potential risks. In accordance with the legislation in force (Presidential Decree 17/96, Law 3850/2010), EYDAP has established and organized an Internal Protection & Prevention Service, which is a direct advisor to the Management on health and safety issues

The main risks that the Company is called upon to address, with regard to the Health & Safety of its Employees, are due to the diversity and specificities of the workplaces (administrative services, external workshops, construction sites, refineries, wastewater treatment plants, etc.), the use of various machinery and tools for a very wide range of technical work, but also unforeseeable situations such as extreme weather conditions, natural disasters (e.g. fires), the COVID-19 pandemic, etc.

#### Certifications

In 2021, IPPS was certified for ISO 9001:2015 "Quality Management System" and ISO 45001:2018 "Occupational Health and Safety". In 2022, a re-certification was scheduled for 2022, which was eventually postponed to early 2023, due to the exceptional circumstances brought about by the COVID - 19 pandemic.

#### Tasks and responsibilities of IPPD

- Complies with legislative requirements, standards and internal guidelines.
- Communicates openly and transparently with all stakeholders so that potential risks are identified and addressed as soon as possible.
- Ensures that a culture of health and safety at work is reinforced through messaging, continuous and targeted training for all employees.
- Prepares written Occupational Risk Assessments for each job performed.
- Carries out measurements of harmful factors in the workplace.
- Prepares specifications for Personal Protective Equipment & Group Protection Equipment.
- Records and investigates accidents at work and encourages workers to report near misses to enable preventive action to be taken to avoid them. To this end, a near miss reporting form has been posted on EYDAP's intranet 'Thalassa', accessible to all employees for completion. It draws up an annual activity report, which records the observations of the Safety Technicians by activity, as well as the recommendations of the IPPS, for the improvement of procedures.
- Develops a program for the issuance by Occupational Physicians of a Certificate of Fitness to each worker according to his/her job.
- Develops a vaccination program for employees.

**Employees who consider that their work poses a risk to their safety are referred to their elected body for this purpose (Occupational Health and Safety Committee), where, among other things, anonymity is respected in order to avoid reprisals.**



## Policy on Health and Safety of EYDAP

EYDAP has adopted and applies EYDAP's Policy on Health and Safety (posted on the corporate website [www.eydap.gr/TheCompany/RegFramework/](http://www.eydap.gr/TheCompany/RegFramework/)) which sets specific objectives, for which it is committed to making every effort to achieve them, while at the same time it considers that each employee should also make every effort to fulfil his/her own responsibilities and obligations, responding to this commitment of the Management.

### Workers' Health and Safety Committee (WHSC)

#### Workers' participation in the prevention of occupational hazards

At the same time, also in accordance with the legislation in force (Presidential Decree 17/96, Law 3850/2010), a Workers' **Health and Safety Committee (WHSC)** has been established, an advisory body composed of elected representatives of employees, with the power to identify occupational hazards. In the event of a serious occupational accident, it proposes measures to prevent its recurrence and, in the event of an immediate and serious risk, calls on the Management to take the necessary measures, including the shutdown of machinery/installation/production process.

Quarterly tripartite meetings are held between the Management, the representatives of the Workers' Health and Safety Committee (WHSC) and the Internal Protection & Prevention Department (IPPD), in the presence of a Safety Technician/Occupational Health Physician.

#### The observations made, during 2022, by Workers' Health and Safety Committee were adopted, almost in their entirety, by EYDAP.

The company encourages open consultation between management and employees on Health and Safety issues, recognizing that their participation in the process is a fundamental human right, in accordance with the relevant **Human Rights Policy**.



### Safety Doctors - Safety Technicians

The Company's Occupational Physicians and Safety Technicians all have an employment contract with a direct employer, EYDAP, and are not from an External Prevention and Protection Agency. .

### Written Occupational Risk Assessments

The Written Occupational Risk Assessment is a basic requirement of the legislation (Law 3850/2010, article 43) for the prevention of incidents (occupational accidents and/or occupational diseases). The quantification of the risk and the prioritization of prevention and response measures are carried out according to the methodological guide of the Hellenic Institute of Hygiene & Safety (EL.IN.Y.A.E).

#### The identification of risks is achieved through continuous and targeted inspections by Safety Technicians and Occupational Physicians.

**An update of the Written Occupational Risk Assessment** is required whenever a change in the way of work is observed by the Safety Technicians or indicated by the workers. From 2020, the revision of the Written Occupational Risk Assessment will be carried out using new, upgraded software, which has been specially developed for this purpose, offering, among other things, the possibility of full retrieval of the history of versions.

2020	2021	2022
a large-scale revision of the Written Occupational Risk Assessment took place in order to include the new data from the COVID-19 pandemic.	the revision was completed with their harmonisation to the new Organisational Chart of the Company.	a new consultation process was carried out with the relevant organisational units to adopt the proposals of the employees concerning the Written Occupational Risk Assessment.





## Personal & Group Protective Equipment (PPE & GPE)

The updating of PPE & GPE specifications is repeated every year in order to meet the latest European standards. In particular, following the visit of an executive of Internal Protection & Prevention Department (IPPD) to a PPE & GPE exhibition held abroad, Internal Protection & Prevention Department (IPPD) has set itself the objective of supplying emergency hand-face-eye washing devices on wheels, which will be installed in the chlorine storage facilities of the water refineries, as an additional safety measure in the event of a major natural and/or technological disaster.



## Inspections of work areas

As every year, in 2022, an annual program has been drawn up by the Internal Protection & Prevention Department (IPPD) and submitted to the Hellenic Labour Inspectorate for approval, in which a specific number of visits per establishment by the Occupational Physicians /Safety Technicians, depending on the number of workers employed in the establishment, is provided for.

**The main objective of the inspections is generally to provide advice on safety at work, to suggest unsafe conditions, to investigate occupational or near-occupational accidents, and to measure harmful factors (noise, humidity, temperature, radiation, with appropriately calibrated instruments, etc.).**

In accordance with the legislation in force, the observations of the OPs/STs must in principle be submitted manually in the book approved by the Hellenic Labour Inspectorate, which is kept in each individual establishment for this purpose.

In addition, on **the initiative** of the Internal Protection & Prevention Department (IPPD), the reports of the OPs/STs are also sent to the Administration in aggregated form at the end of each month, in the form of electronic files, including photographic material, if appropriate. **The evaluation** of the reports of the OPs/STs is also carried out by their scientific supervisors in the Internal Protection & Prevention Department (IPPD), who also have the capacity to carry out ad hoc inspections of the workplaces.

In addition, an annual report summarising the main findings of the OPs/STs is prepared by the Internal Protection & Prevention Department (IPPD) at the end of each year and sent to the management.

## Investigation of incidents

**All notifications of occupational accidents are also communicated within 24 hours to the Internal Protection & Prevention Department (IPPD) ( apart from Hellenic Labour Inspectorate), so that the latter can immediately investigate each incident.**

The actions taken by the Internal Protection & Prevention Department (IPPD) include, inter alia:

- an autopsy at the place where the incident took place
- interviews with the parties involved
- preparation of a report by the competent Safety Technician, analysing the causes of the accident
- sending the written report to the management
- proposal of measures to avoid the occurrence in the future

## Archive of accidents at work

A detailed record is also kept by Internal Protection & Prevention Department for each industrial accident, based on both the **ISO 9001:2015** and **ISO 45001:2018** quality standards, while the data in this record is also subjected to statistical processing, in order to determine, among other things, quantitative parameters relating to health and safety performance. .

## Employee safety training

During 2022, in person training sessions for employees on health and safety, taking all necessary measures to protect them from coronavirus, started again. Along with the in-person trainings, Internal Protection & Prevention Department distributed educational leaflets, targeted messages were sent to employees, via e-mail, on critical issues (such as unsafe conditions in specific workplaces, prevention of heat stress, during the summer period, etc.), and in general, every effort was made to instil a corporate culture of health and safety. A detailed record is also kept by Internal Protection & Prevention Department , with details of the employees who took part in each individual training activity, in accordance with the requirements of the ISO 9001:2015, and ISO 45001:2018 quality standards.

*Quantitative data on Employee Safety Training is given in the section "Employee Training & Development" of the same Report.* ➔

## Employee health coverage

EYDAP provides full health coverage to its employees through a self-sufficient Service, which is staffed by doctors and paramedical staff of various specialties.

*For a detailed discussion of this issue, see the section on "Labor Practices" in the same Report.* ➔



## Accidents at work

According to the legislation, an industrial accident is defined as the death or incapacity for work of the insured person, caused by a violent incident that occurred during or because of the performance of work (during the employee's transit to the place of work and during his/her return to his/her place of residence).

Accidents at work of contractor personnel are excluded from the count, as they are counted to the employers with whom these workers have signed contracts.

**During 2022, there was no violation of labor law relating to the health and safety of employees that would have triggered publication, according to the ESG-SS-S4 sectoral index, due to the imposition of a fine or other administrative penalties on the company.**

## Counting of accidents at work

	2021	2022
<b>Number of fatal accidents at work</b>	1	0
<b>Number of accidents at work with severe consequences</b>	0	0
<b>Number of serious accidents at work</b>	8	6
<b>Total number of accidents at work</b>	13	16
<b>Total number of working hours</b>	4,878,938	4,603,862
<b>Frequency index</b>	0.533	0.521
<b>Severity index</b>	19.72	19.8

### Clarifications:

- The frequency ratios of occupational accidents have been calculated by assuming the total number of man-hours worked to be equal to 200,000.
- The **numerical data** in the Table are derived from the record of occupational accidents kept at the Internal Protection & Prevention Department, in accordance with both ISO 9001:2015, and ISO 45001:2018 quality standards.
- The criterion for classifying an **occupational accident as serious** has been taken as the absence of a worker from work for a **period of 15 days or more**.
- A **severe consequences accident at work** is one that results in a serious injury from which the worker cannot or cannot be expected to fully recover to his or her original state of health before at least 6 months have elapsed.
- The **total number of accidents at work shall include road accidents** caused during journeys on official business, as well as road accidents occurring when workers are going to or leaving their place of work, and within a period of 1 hour of the start or end of their working hours respectively.
- **The results of the table refer to all employees (permanent employees, part-time cleaning contractors, 8-month contract employees, 6-month and 2-month contract students, trainee lawyers, NSRF students) with an employment contract in which EYDAP S.A. is designated as the employer.**

## Occupational diseases

Occupational Physicians of Internal Protection & Prevention Department develop, among other things, vaccination programs, with the most recent example being Hepatitis B, for employees in particularly sensitive areas of the company's activity, such as wastewater quality control laboratories, Sewerage networks, Wastewater Treatment Plants (WWTPs), etc. Also, in compliance with the legislation in force (Presidential Decree 212/2006), a special medical file is kept for employees who have been exposed to asbestos, taking all necessary measures to ensure medical confidentiality, in accordance with Law 3418/2005.

**During 2022, no confirmed occupational disease was reported to the Internal Protection & Prevention Department .**



## MATERIAL TOPIC

### 4.1.6 Secure Customer Service Affordable Tariff

For EYDAP, continuing to provide high quality water supply and wastewater services at an affordable price for consumers, serving customers through structured and digital processes is part of business continuity and growth.

**The Company's Pricing Policy through tiered rates, special rates, customer debt management aim, on the one hand, to respond to a large extent to the actual needs of households and businesses and, on the other hand, to ensure EYDAP's resilience and financial stability.**

#### Risks

Customer debts, customer affordability, reduction of available resource due to climate change, loss of resource due to network failures, with a parallel loss of customer confidence.





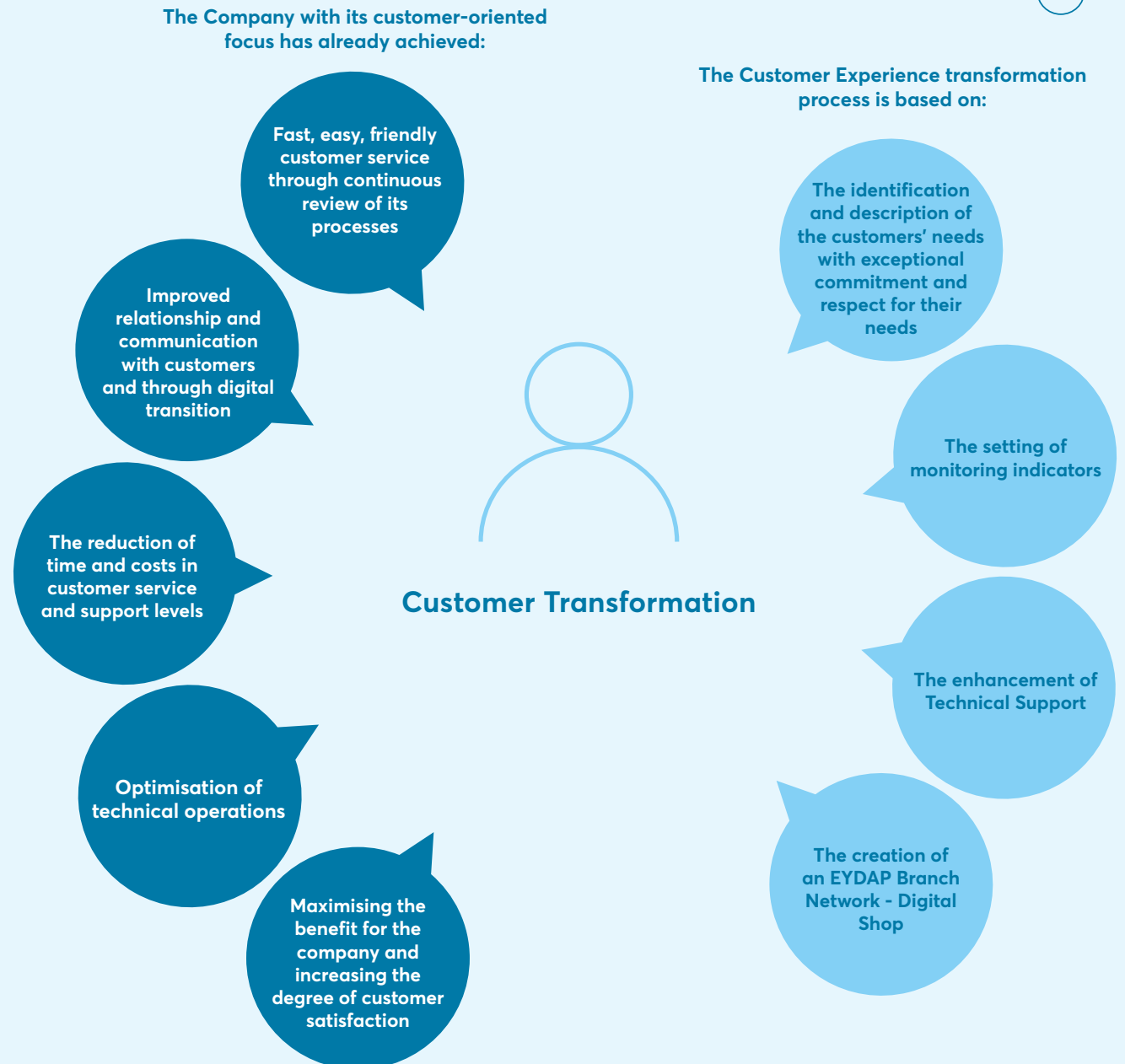
## Our impacts

The Company's unrelenting efforts to ensure uninterrupted access to Water/Sewerage Services in order to provide the necessary commodity to the customer and ensure the Company's business resilience. The existence of a tiered rate helps to limit the wasteful use of water and safeguard the resource in order to ensure the uninterrupted operation of our business. It also helps to reduce our environmental footprint.

In 2022, the optimization of the printing, enveloping and digital imaging processes of bills was completed, aiming at saving resources for the company and optimizing communication with the customer (trust, speed, reliability).

**The new processes are estimated to reduce operating costs for the above by 40%.**

In addition, the quick wins to increase the conversion of customers to electronic billing have been drawn up.





## Customers

In 2022, we are referring to a total of

**2,247,915 water supplies**

**2,228,084**

connections are active and relate to water and/or wastewater services.

**76.9%**

identification of connections (with valid owner or tenant VAT number)  
(1,714,856 connections)

**Our intention is to continuously increase the number of identified connections until the identification of the total is achieved.**

**0.94% increase**  
compared to 2021



**134,037**  
**Water connections**

↑ **8.95% increase**  
in relation to 2021  
(123,030)

**44,933**  
**Sewerage connections**

↑ **0.44% increase**  
in relation to 2021  
(44,736)

**2,068,945**  
**Water supply/  
sewerage connections**

↑ **0.47% increase**  
in relation to 2021  
(2,059,230)

**2,211,049**  
**Common/commercial-industrial  
supplies**

### Focus on special customers

#### MUNICIPALITIES, PUBLIC SERVICES AND MAJOR CUSTOMERS

Recognizing the needs and requirements of the different Customer Groups, in 2016 EYDAP created a separate administrative unit to manage all issues related to this special group of consumers concerning municipalities, Public Services and Major Customers.

In 2022, the effort continued for the

- reduction of their outstanding debts preventing the accumulation of new and
- identification of their benefits by registering them on the EYDAP SA website and the option of receiving an eBILL.

## Pricing of our services

The Company's water supply and sewerage tariff is determined on the basis of Government Gazette 3188B/16.12.2013 and is available on the Company's website [eydap.gr](http://eydap.gr)

**The existence of affordable tariffs reflects the support of society, ensures the mitigation of social inequalities and protects vulnerable groups of the population from being deprived of the basic common good, water.**

**Tiered tariffs act as a deterrent to the waste of this natural resource.**

EYDAP's billing is divided into: Domestic Tariff & Special Tariffs

### Domestic Tariff\*

**2,207,237**  
connections

**0.86% increase**  
in relation to 2021

\*is granted to the majority  
of consumers

### Special Tariffs

**4,628**  
connections

**0.95% decrease**  
in relation to 2021  
(4,672)

Special Tariffs - with data up to 31.12.2022	2022	2021	Rate of change
<b>Special tariffs</b>	<b>4,628</b>	<b>4,672</b>	<b>-0.95%</b>
<b>1. Industrial/Professional Rate</b>	3,812	3,832	-0.52%
<b>2. Charity Rate</b> Provided not only to foundations and associations within the scope of Law 1111 of 8/11.2.72 and A.L. 2039/1939, but also by decision of the Board of Directors to other foundations - entities that perform charitable - welfare work	331	356	-7.02%
<b>3. Rate for "Strengthening Networks of Municipalities &amp; Communities - Water Supply of the Islands"</b> They also include: water supply outside of city plan areas and water supply with refined water which is transported by ship, through special facilities located in the port of Lavrio to islands of the South Aegean Region (Cyclades etc.).	423	422	0.24%
<b>4. Rate for " Supply of ships "</b> This refers to the special facilities installed for the supply of drinking water to the PHO, the Hellenic Refineries of Aspropyrgos S.A., to natural or legal persons of public or private law for the supply of ships.	62	62	0%

### General Tariff

Average price of invoiced revenue per cubic meter (€/m<sup>3</sup>): 1.22

Average quarterly bill payable price (including VAT) ~33 €/month, 11 € /month

### Industrial - Professional Tariff

Average price per cubic meter for the (€/m<sup>3</sup>): 1.11



## Customer service

### 1. Digital services

Modern and easy-to-use digital services through multiple channels of communication with our customers.

For all our requests we have the option of digital service except for New Connection Requests

- Through the company's website [www.eydap.gr](http://www.eydap.gr) by registering to **εΕΥΔΑΠ** the consumer has the option of integrated management of bills, registration of the water meter reading, receiving updates via sms and mail as well as processing a number of requests.  
[eydap.gr/MyAccount/PayUnregisteredBill](http://eydap.gr/MyAccount/PayUnregisteredBill) for digital service requests
- **EydApp -Application for mobile phones** for
  - bill payment,
  - damage report,
  - notification of water supply interruptions due to damage,
  - direct communication with 1022,
  - finding the nearest Service Center.
- **Payment of Bills/Settlement Fees**
  - **Online from EYDAP's site** using a debit, credit or prepaid card of the respective cooperating Banks and redirecting to the payment system of DIAS SA (also valid for non-identified customers)
  - In regional EYDAP customer service centers
  - At the **Post Offices** of the prefecture of Attica
  - In **bank branches** at the cash desks (in ATMs, with a standing order from the bank)
  - Online via a customer's bank (**web banking**)
  - Online via the **EydApp** application

**35,617**  
the transactions  
of customers  
through  
the Eydapp  
application

### 2. Management of customer requests

In 2022 were received by BCC (Billing & Customer Care)

**263,543**  
requests

↑ **63.33% increase**  
in relation to 2021

**60,888**  
requests via site

↑ **1.04% increase**  
in relation to 2021

**202,655**  
requests at the Regional  
Centers

↑ **95.72% increase**  
in relation to 2021

**29,395**  
requests for appointments

↓ **4.89% decrease**  
in relation to 2021

**141**  
requests for  
video calls  
For the period November-  
December 2022.  
The service was launched in  
November 2022.

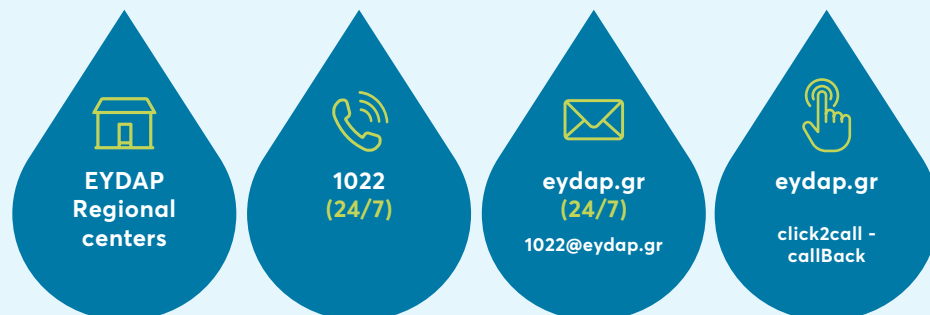
**32,454**  
calls to 1022  
for Water Disconnect-Reconnect  
issues, Bills, Metering, Debts,  
Connection Information.

**99.37% were completed.**  
(32,248 calls)

The increase in traffic at the Regional Centers compared to 2021 caused by the removal of the covid-19 restrictions.

EYDAP continues its actions for the shift to digital transformation in customer service, such as: servicing all customer requests through a website, strengthening electronic updates and digital communication in general, and actions in the context of switching customers to e-bill.

### 3. Complaint management through three distinct contact channels



#### Complaint calls 2022

##### Water Supply Network

(internal leakage, work on the connection, removal of debris, pavement-asphalt restoration, third party works, manhole covers, flooded basement, water in street, water in meter well, water quality, pressure and water disconnection)

**79,120**

calls

**88.03%** (69,647 calls) **were resolved**

##### Sewerage Network

(sewer blockages, manhole covers and pavement asphalt rehabilitation)

**31,654**

calls

**98.96%** (31,325 calls) **were resolved**

#### Management is updated on a weekly basis

The report lists the incoming 1022 calls, by Division.

#### Calls are listed by month in key categories

	Water Supply Network Division	Sewerage Network Division	Customer Service Division
<b>Registered</b>	<b>79,120</b>	<b>31,654</b>	<b>32,454</b>
<b>Resolved</b>	<b>69,647</b>	<b>31,325</b>	<b>32,248</b>
<b>% Resolved</b>	<b>88.03%</b>	<b>98.96%</b>	<b>99.37%</b>
Resolved in Up to 6 Hours	5,979	16,745	5,771
% Resolved in Up to 6 Hours of all registrations	7.56%	52.90%	17.78%
Resolved in Up to 24 Hours	16,802	28,596	10,239
% Resolved in Up to 24 Hours of all registrations	21.24%	90.34%	31.55%
Resolved in Up to 48 Hours	26,904	30,508	13,613
% Resolved in Up to 48 Hours of all registrations	34.00%	96.38%	41.95%
Resolved in Up to 120 Hours	40,649	31,193	18,761
% Resolved in Up to 120 Hours of all registrations	51.38%	98.54%	57.81%
Resolved in Up to 240 Hours	52,045	31,295	21,844
% Resolved in Up to 240 Hours of all registrations	65.78%	98.87%	67.31%
Resolved in Up to 480 Hours	60,124	31,330	23,552
% Resolved in Up to 480 Hours of all registered	75.99%	98.98%	72.57%
Resolved in Up to 720 Hours	63,223	31,337	24,451
% Resolved in Up to 720 Hours of all registered	79.91%	99.00%	75.34%

2022

**664,021**

telephone calls

**1022**



**25.15% increase**  
in relation to 2021

**504,156** for information on supplies, bills, etc.  
**159,856** or technical issues

**66.49%**

of these were answered  
in a waiting time of <40"



**52.79% increase**  
in relation  
to 2021





1022@eydap.gr

**172,444**

e-mails



**23.13% increase**  
in relation to 2021

**82%**

were answered immediately



**click2call - callBac**

**22,945**

Click2call calls

**7,109**

CallBack calls

## Whistleblowing Procedure

A detailed report on this issue is provided in the "Fight against corruption" section of the same Report. ➔



## Complaints via hotline 1022 concerning the management of water quality

**In 84.7 %**

**of the cases the response of EYDAP is immediate and at most within 24 hours.**

**In 2022**

**56.6%**

of the complaints made were resolved by telephone

**43.4%**

were investigated through sampling and laboratory analysis

technical actions were required in

**5.6%** of the quality complaints reported in 1022

**100%**

of the complaints for which a need for intervention by EYDAP had arisen **were resolved**

**In 2022, there was no incident of a consumer request not being satisfied nor an incident of a fine or compensation being imposed for water quality issues.**



## 4.Customer debts

Amounts in thousands of euros

	2021	2022	Change %
Individuals	221,511	178,012	- 19.6%
Public Sector	20,911	18,996	- 9.2%
Municipalities	21,569	32,148	+ 49.1%
<b>Total</b>	<b>263,991</b>	<b>229,156</b>	<b>- 13.2</b>

Reference to consumer debt is made on page 33 of the Annual Financial Report

EYDAP, putting into practice its social sensitivity, applies a discount policy, takes preventive measures to avoid the increase of debts and facilitates the repayment of debts through procedures approved by the Board of Directors, as specified in the Revenue and Customer Claims Management Policy of EYDAP SA (Decision 21010/2022 of the Board of Directors).

### 2022

#### The main proactive actions of the Company to minimize, as far as possible, the debts

- Stepping up efforts to identify the connections of municipalities, by promoting their registration on the EYDAP website and the option to receive ebill.
- And acceptance of their electronic billing.
- Registered customers are immediately informed about the issuance of their bill.
- Notification of consumers on debt issues in hard copy.

**2022 109,480 notifications**      ↑ **increase 62.86%**  
**2021 67,224 notifications**

- Identified consumers: online notification of on issues of overdue payments-increased consumption-impending water supply interruption.
- Identified customers email for timely repayment of overdue instalments, cancellation of credit, notification of increased consumption and also by pasting a special form at the entrance of the property.

**In 2022 191,372 notifications of imminent termination, debts and cancelled settlements were sent**

→ 42.8% in digital format

#### Main repressive actions to minimize, as far as possible, the number of debts

- Settlement of debts based on specific and established procedures.

**29,656 debt settlement requests in total**

25,282 at Regional Offices  
 4,374 through a website

↑ **increase of 40.67%**  
 compared to 2021  
 (21,082 requests)

- Interruption of the water supply to the property due to overdue debts / Removal of the water meter / application of the KEDE, is carried out if the conditions are met and always in accordance with the Regulation on the operation of the water supply network.

2022

Electronic  
Notifications

**867,065**

↑ **78.56% increase**  
in relation to 2021

**81,892**

of these were related to an  
imminent interruption

↑ **51.29% increase**  
in relation to 2021

**Online notifications concerned:**

- Bill Issues,
- Credit Issues,
- Pending credit cancellations,
- Credit cancellations,
- Requests for instalments by a committee (review),
- High consumption,
- Impending cancellation of settlement due to overdue instalments,
- Standing order,
- Impending termination.

2022

Water supply interruption

**in 90,001**

**water supplies**

↑ **236% increase**  
in relation to 2021  
(26,786 water supplies)

**Within 30 days,  
62% were reconnected.**

## Charter Of Obligations to the Costumer

With a view to providing excellent Customer service and focusing on people, EYDAP is committed to the consumer for prompt and efficient service of their requests, as specified in the "Charter of Obligations to the Consumer". The purpose of EYDAP S.A., the obligations undertaken by EYDAP for the resolution of Consumer Requests as well as any consumer compensation in cases where their requests are not satisfied within the time limits provided are mentioned therein. Detailed reference is made in [eydap.gr](http://eydap.gr)

## Certification of Procedures ISO

The entire General Directorate for Customer Services (except for the Market Development Directorate) is certified with **ISO 9001: 2015** quality management system for the provision of Telephone, Digital and In-Person Customer Services, Customer Request Management, Water Supply Management and Water and Sewerage Bill Collection with initial certification since 2010 (ISO 9001: 2008) which is renewed on an annual basis.

## Support to society

💧 **In the context of social inclusion, EYDAP implements pioneering actions.**

*Detailed reference is made in the "Diversity & Equal Opportunities" section of the same Report. ➔*

💧 **EYDAP undertakes important initiatives in the context of its pricing policy to support vulnerable social groups, recognizing the unfavorable economic situation experienced by the Greek society.**

**Supporting socially vulnerable groups through institutionalized decisions of the Board of Directors to provide them with a discount on their bill.**

Discount on bills	2021	2022	Change %
Extraordinary Special Rate	5,449	3,640	-33.20%
Discount for large families	9,610	8,304	-13.59%
Senior Citizens	560	572	+2.14%



## ● EYDAP's assistance in dealing with emergency situations

- **Free supply of potable water to the Municipal Unit of Nea Makri and The Municipal Unit of Rafina** and up to the amount of 300.000 € per half a year.
- **Taking care of the bills of those affected by fire:** concerns the supply of the fire stricken areas of 2021 (Thrakomakedones and Varybombi of the Municipality of Acharnes and Adames of the Municipality of Kifissia) for which a High Consumption Bulletin was issued and consists in charging consumption based on the corresponding consumption of the previous year.

## ● Discounts on increased bills

The Company, taking into account social and income criteria and applying institutionalized procedures, makes discounts on increased consumption bills and on bills for illegal water extraction.

	2020	2021	2022
Number of requests submitted for bill reductions	6,052	6,655	9,086
Number of requests granted	5,982	6,549	8,725
Indicator satisfaction of requests for bill reductions* (from hidden leaks, illegal water intakes, etc.)	99%	98%	96%
Value of bills to be examined	10,214,043.48	11,057,904.06	15,968,290.44
Value of discount	5,594,417.20	6,246,893.57	8,558,684.46

\* Indicator "satisfaction of requests for bill reductions", with the denominator being the number of requests submitted annually for bill reductions and the numerator being the number of corresponding requests satisfied by the Company.

**2,431**  
more  
examined  
requests

↑  
**36.53% increase**  
of the number of  
examined requests  
in relation to 2021  
(6,655)

↑  
**37.01% increase**  
increase in the  
total value of the  
provided discount  
from discounted  
accounts in  
relation to 2021

### Bill reductions from hidden leaks, illegal water intakes, etc.

were satisfied

2020 **99%** of the requests

2021 **98%** of the requests

2022 **96%** of the requests

with the value of the discount granted amounting to  
**54%** of the value of the bills under consideration.





## Protection of consumers' personal data

EYDAP, as the Data Controller, places particular emphasis on the protection of its customers' personal data both during collection - and this applies to all physical or electronic sources - and during their processing and retention. It takes particular care to implement the technical and organisational measures provided for by the current legislative framework and invests in the appropriate training of its human resources by area of specialisation.

EYDAP updates and publishes the **Consumer Privacy Policy for the information of consumers on Personal Data Protection issues**, through the bill (printed or electronic form), the official corporate website [eydap.gr](http://eydap.gr) the apps and directly when a request is made. In cases of use of EYDAP's apps or the electronic services provided through its website, further specific information is provided to the user through simple and clear terms of use and specific updates - Privacy Policies regarding the processing of his/her data.

All **personal data** processed by EYDAP have been brought to its knowledge by the Subject or a person authorized by the Subject or are obtained from manifestly published data or Public Authorities to which the Company has legal access and limited to the service of the water supply contract and consumer information.

Where appropriate and in the context of serving the Company's legal obligations, the data may be disclosed to public authorities (e.g. the Greek Tax Authority, judicial authorities), which process the data as third party and independent Data Controllers for a specific and sole purpose, as defined by the legal framework.

In case of the necessity to issue statistical data and for the general optimization of the services provided by the Company, the competent Services of the Company take care of procedures for the anonymization of personal data, ensuring the prior notification of the Subjects.

EYDAP evaluates, examines and answers and, where appropriate, satisfies any query submitted to it with a particular sense of responsibility and respect towards the consumer, in compliance with the relevant Policies and Procedures that it applies in principle within the legal timeframes set by the regulatory framework.

Reference is also made to this issue in the "Protection of Personal data" and "Corporate Governance" ➔ sections of the same Report.



## Customer satisfaction survey

A small scale customer satisfaction survey was conducted in 2022 through the use of a multi-channel communication platform.

**6,906 e-mails**  
were sent

**1,195**  
**customers**  
completed the  
survey

**91%**  
response rate of  
**"Very Satisfied -**  
**Satisfied"**

### Objectives for 2023

**Adoption of new technologies  
in the Regional Centers  
(digital customer signature, etc.)**





MATERIAL TOPIC

## 4.2 Diversity & Equal Opportunities

### Human Rights Protection

EYDAP is committed to operating in accordance with ethical rules, ensuring human rights at work and not tolerating any kind of discrimination or offensive behavior against one's personality or social exclusion or unfair treatment for any reason.

**The Company's concern is focused on working conditions, health, safety of persons and facilities, as well as corporate social responsibility, protection of local communities and the environment.**





## Rules of conduct

The Company ensures the development of a "culture" of regulatory compliance, to inform its Personnel and Executives on the content and implementation of the Company's Policies and Regulations and to ensure compliance with them.

**All employees are required to comply with the Rules of Conduct, which define the relations between themselves, with the Company, with external partners and customers and reflect the Company's policies.**

There is full compliance with the Regulatory Framework in force (EYDAP's Staff Internal Regulations, the Company's Operating Regulations and the Code of Conduct which are revised according to business needs and changes).

**A new Code of Conduct and Professional Behavior** came into force as of November 2022, which clearly sets out the ethical principles and values as well as internal rules of conduct that must be observed by all those who have an employment or cooperation relationship with EYDAP SA.

The Code is based on international standards and best practice methods and aligned with relevant regulatory requirements.

RESPONSIBILITY FOR THE APPLICATION of the code lies with the heads of the Company's organisational units, who ensure that all employees of their organisational units and external partners have fully understood the Code and behave in accordance with it.

The Code is posted on the corporate website [eydap.gr](http://eydap.gr).

The Company encourages its executives, employees and partners to immediately report cases of violations and inappropriate behavior in order to be able to take any corrective action required. The Compliance Officer has the authority to receive reports.

The Company takes all reports of potential misconduct seriously, ensuring in all cases that the confidentiality of reports is ensured and that an investigation is conducted to determine any violation. For each violation, the necessary corrective measures and sanctions are taken.

**Communication to employees:** the Code was communicated to employees with an obligation for them to provide written proof that they were aware of it. Failure to read the Code and/or to sign the "Personal Commitment" does not release employees from the obligation to comply with the Code.

### The Company has adopted and applies:

- Human Rights Policy
- Code of Ethics and Professional Conduct
- Whistleblowing Policy
- Policy to prevent and combat violence and harassment at work
- Diversity Policy
- Employee Data Protection Policy

by adopting preventive actions in order to avoid acts and/or omissions that may be detrimental to human rights.

*Detailed reference to the Policies in the "Corporate Governance" section of the same Report ➔*



## Human Rights Policy

In November 2022, the Human Rights Policy came into force, by Board Decision, which is based on the fundamental principles of the Greek Constitution, the Principles of the United Nations Universal Declaration of Human Rights, as well as a number of other International Conventions clearly outlined in the Policy.

The Company, in its operation, is committed to the protection of human rights, taking preventive actions in order to avoid acts and/or omissions.

**The Policy applies** to the Company as well as to any existing or future subsidiary, and its scope binds the Company's personnel with a dependent employment contract, personnel with a contract for services or otherwise independent, members of the Company's Board of Directors, other partners (contractors, suppliers, service providers, etc.).

**Monitoring and evaluation of the implementation of the Policy:** The Company shall ensure that it identifies and prevents situations that endanger human rights by informing and training all its staff and other partners appropriately. The Risk Management and Regulatory Compliance Department is responsible for the compliance and effective implementation of this Policy.

**Reporting violations of the Policy:** The Company's Policy must be strictly adhered to by all without exception. No violation will be tolerated and in fact, in case of violation of its principles, the procedure for imposing legal sanctions will be activated. In the event that a human rights related principle is indeed violated or there is a reasonable suspicion of such a violation, then the relevant report/complaint should be submitted to the Company in accordance with the Whistleblowing Policy, the Policy for the Prevention and Combating of Violence and Harassment at Work and the Human Rights Policy.

**Approval and review of the Policy:** Under the responsibility of the General Directorate of Human Resources, the Policy is communicated to the Company's employees and posted on the Company's website. The Policy is approved by the Board of Directors, reviewed annually by the Risk Management and Compliance Department and revised if and when required. The Risk Management and Compliance Division is responsible for preparing and proposing the revision for approval.

The Human Rights Policy is posted on the corporate website [eydap.gr](http://eydap.gr).

**Protection of Human Rights in the Supply Chain:** reference is made in the relevant section.

*Reference is made to the topic in the "Supply Chain Management" section of the same report.* ➔

**Collective agreement of employment:** The rights of workers, on equality and safe working conditions, are guaranteed through Collective Agreements of Employment, compliance with the legislation on the existence of an Internal Protection and Prevention Service (IPPS) and a Health & Safety Committee (HSC).

*(The issue of Employee Health and Safety is discussed in the corresponding section).* ➔

**98,02% of EYDAP employees are covered by Operational Collective Labor Agreements.**

Just 1.98% of the employees with fixed-term contracts are not covered by these Collective Agreements but by the General Provisions of the Labor Law.

**All employees, both regular and contractors, work full-time.**





## Equal opportunities

In application of the provisions of Law 1648/1986 (Law 2643/98) concerning people with disabilities, large families, children of war invalids, etc., EYDAP has integrated 231 employees (9.92%), of whom 75 are disabled.

<b>Persons with special needs</b>	<b>75</b>
<b>Large families (parents &amp; children)</b>	<b>75</b>
<b>Children of war invalids</b>	<b>21</b>
<b>Children of fighters</b>	<b>26</b>
<b>Persons with a child, wife or brother with disability of 67%</b>	<b>30</b>
<b>Other dependants under law 1648/86</b>	<b>4</b>

**Equal salaries:** All employees, irrespective of gender, are paid the same salary, varying only according to qualifications, years of service, job description and position of responsibility, if held.

**Selection criteria for executive officers:** The selection of executives will be based on merit, skills, ethics and experience without regard to gender, color, race, nationality, disability, age, religion, sexual orientation, political beliefs or any other unfair criteria.

**Employee development:** The Company supports all employees equally employees to develop their skills and is supportive in every aspect of their work. individual and corporate development efforts. All employees have the opportunity and are encouraged to participate in training and education programs. (Detailed reference is made to "Employee Training & Development" in the same Report).

**Internal communication:** The Company's internal corporate website (portal) and the internal electronic magazine "I Pigi mas" are the main means and channel of equal communication and information, with free access for all employees.

**Right to unionize:** the constitutional right to unionize is exercised by EYDAP Employees' Federation, which was founded in 1979, is a Secondary Trade Union and represents the Company's employees. Its composition is formed on a proportional basis by elected representatives of the thirteen Primary Unions. The purpose of the OME - EYDAP is the study, protection and promotion of the trade union, economic, professional, ethical, insurance and social interests of its members, the protection of the environment, the realization of the principle of gender equality and the safeguarding of corporate responsibility.

The aim is to claim the improvement of the working conditions of employees using dialogue and cooperation with the Company's management, always within the framework of the rules of corporate social responsibility. The objective is to claim the improvement of the working conditions of the employees using dialogue and cooperation with the Company's Management, always within the framework of the rules of corporate social responsibility and the Trade Union Law 1264/1982.

In order to achieve its objectives, the Federation negotiates for the resolution of its members' problems with any competent body or person and ensures that the Company Collective Labor Agreements are drawn up. The Federation also participates actively in the Service Councils, Disciplinary Councils and any other organ or body represented.

The Federation is represented by 2 members, who have voting rights, on the Board of Directors of the Company.

**96.4%**  
**of employees registered with the Federation**  
**Total 2,244**

### Protection of personal data:

Reference is made in the sections "Labor Practices" ➔

"Employee Training & Development" ➔, "Corporate Governance" ➔

"Protection of Personal Data". ➔

## EYDAP's initiative for permanent staff the family protection:

9-month parental leave instead of the reduced hours required by law. In 2022 and in the context of family protection and in application of Law 4342/23-12-2015, such leave was granted to 26 employees of the Company (13 Men and 13 Women). 100% of the employees who were granted leave and whose leave expired in 2022, returned to work after it expired



8 days of leave per year, instead of the 5 required by law, due to illness of their child, aged up to 16 years old and not up to 12 years old as again required by law

and 4 days off for each child to update working parents on their school progress, a benefit that applies to children aged 5-18 years.

After exhausting their statutory maternity leave, to take leave to raise their child at half pay until the child is 2 years of age

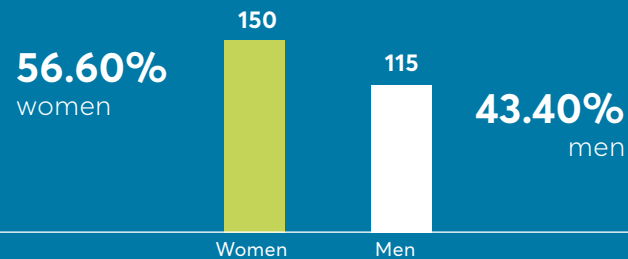


## Presence of women in EYDAP

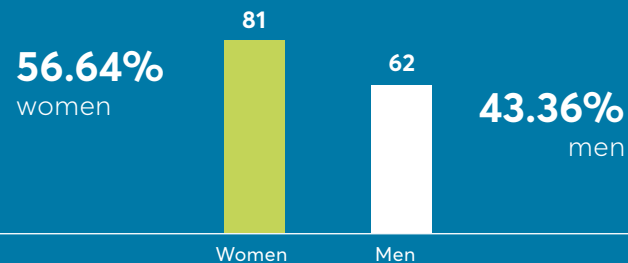
In 2022, as a percentage of all permanent employees

**31.11%** are women (30.7% in 2021)

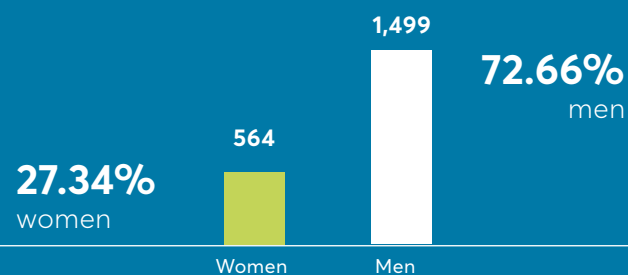
Of the **265** employees in **positions of responsibility**,



Of the **143** employees in **managerial positions**



Of the **2,063** employees who **do not hold management positions**



**Of the 13 members of the Board of Directors,  
2 are women (15.38%)**

**of whom one is the Chairman  
of the Board of Directors.**

### Composition of the board of directors and breakdown of employees

Board of directors	<30 years	30-50 years	>50 years
Women	0	0	2
Men	0	2	9
Total	0	2	11

With a position of responsibility *	<30 years	30-50 years	>50 years
Women	0	45	105
Men	0	24	91
Total	0	69	196

\* Heads of Service, Deputy Directors, Directors, Directors of Activities, General Directors. General Managers

### In the Company

- no issue of unequal treatment and discrimination of an employee on the basis of gender, age, religion, sexual orientation, disability, etc. has ever arisen,
- there has never been child or forced labour and free expression has always been encouraged. All employees are treated equally, without any discrimination.



## Accessibility

In the context of social inclusion, EYDAP implements pioneering actions:

### 1. Modern and easy-to-use digital services through multiple channels of communication with our customers.

For all requests there is the option of digital service except for New Benefits requests

*A detailed report on this topic is provided in the section "Secure Customer Service – Affordable Tariff" in the same Report. ➔*

### 2. Accessibility to our services for visually impaired people through specially designed services

- Since 2017 enables the possibility of sending special readable bills (in Braille, large fonts, sending sms, e-mail) clients served: 7 persons.
- Summary of the Sustainable Development Report 2021 in audio file format
- Subtitling of corporate videos posted on the corporate website that are relevant to consumers
- The degree of accessibility of the corporate website to visually impaired people was determined to be 76/100 using the Lighthouse v.100.0.0.0 accessibility testing tool for the Google Chrome browser add-on. The corporate website development team is working to improve accessibility and is committed to adopting the tool's key recommendations to the extent possible. The EYDAP website uses the userway add-on specifically for disabled users. There is a posted Accessibility Statement on the corporate website.

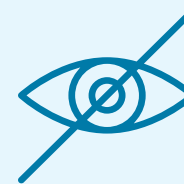
### 3. Working on the possibility of serving the hearing impaired (deaf/hard of hearing) with remote interpretation.

Subtitling of corporate videos posted on the on the corporate website and concerning consumers.

### 4. Uninhibited accessibility for disabled persons and persons with disabilities

To facilitate and protect people with disabilities, the following are provided: ramps for people and wheelchairs (in 66% of the buildings), parking spaces, special lifts (in 22% of the buildings) and sanitary facilities, in accordance with existing legislation, so that they can move around in safety.

In the same consistent manner, our aim is to further improve the existing infrastructure and at the same time create new ones, so that the building facilities become disabled-friendly (customers and employees) to the maximum extent possible, in compliance with the existing provisions of the legislation.





## MATERIAL TOPIC

### 4.3 Labor Practices

EYDAP is the largest water cycle management company in Greece. The high level of know-how, the continuous monitoring of new knowledge with parallel personal development of the executives contributes decisively to the long-term provision of high quality services.

**The rational and objective utilization of its human resources and the continuous monitoring of new knowledge, with parallel personal improvement and professional development, are a catalyst for business continuity and resilience.**



## Commitment

EYDAP is committed to operating in accordance with ethical rules and the applicable legal and regulatory framework throughout its activities.

In November 2022, the Company established a Code of Conduct and Professional Behavior to guide the daily professional behavior of its employees and other partners. Reference is made in the "Diversity & Equal Opportunities" section. ➔

## Risks

Loss of know-how, psychosomatic health of employees, compliance with the working framework of staff rights and obligations



## Our impacts

### Corporate Culture

The continuous strengthening of the corporate identity and culture is a long-standing objective for the Company.

Integrity, diversity, inclusion, respect, cooperation, operational excellence and credibility are values embedded in EYDAP's corporate culture.

Important factors in this direction are:

- **The internal corporate website (portal)** - a communication and information channel with free access to all employees
- **"I Pigi mas"**. The weekly e-magazine with corporate news, innovation issues, promotion of the work of the Company's Directorates and other issues of general interest.

#### In 2022 was held

- an anonymous "work experience" survey
- an event for retired colleagues



### Operating Regulation



The Company has an Operating Regulation approved by the Board of Directors, a summary of which is published on the Company's website, in accordance with the requirements of Article 14 of Law 4706/2020. The Regulation describes the organizational structure of the Company, the division of responsibilities and activities of each individual organizational unit, as well as their organization and operation, in order to ensure the lawful and orderly operation of the Company.

In the same framework, the Company establishes a procedure for the recruitment and performance evaluation of senior managers.

### Optimisation Actions

In the firm belief that the Company's development goes hand in hand with the development of our employees, the Company has included in its transformation and is implementing actions targeted at Human Resources.

The development of a complete Strategic Plan for the Company's Human Resources and the utilization of its human capital is linked to the corresponding adoption of a new Corporate Culture and the continuous development of its human resources.

In this context, the implementation of our strategy for the planning of human resources needs with a 10-year plan is underway.

**In addition, we are proceeding with:**

**Modernisation of performance evaluation procedures**

**Employee development opportunities**

**Change management and corporate culture management**

a necessity but also an opportunity to ensure corporate sustainability, adapting to ever-changing business requirements and rapid technological developments.

## Recruitment

**The recruitment process to meet the Company's needs is always carried out on the basis of the relevant legal framework through the Public Recruitment Service. As the procedures can sometimes be lengthy, EYDAP temporarily covers part of its needs by hiring contractors following a call for applications through the Public Recruitment Service.**

The restriction of recruitment due to Law no. 3833/2010, has resulted in a constantly decreasing number of employees due to retirement.

In order to reduce the risk of difficulty in meeting the Company's growing needs, two (2) tenders (1K/2018 and 4K/2018) were announced for the recruitment of 300 people of various specialties on an open-ended contract. The final results of the competitions were issued in 2020.

By 31.12.2021, the procedures for the recruitment of 249 persons with an open-ended contract were approved (66 persons were recruited in 2021 and 66 additional persons in 2022). The procedure resulted in several resignations and ASEP was requested to make a replacement of the resigned persons. It is expected that the above recruitment process will be completed in 2023.

The need for new specialized knowledge, the expansion of the Company's field of activity (integration of new areas into the water supply and sewerage network, construction of new projects in East Attica), made even more urgent the need for immediate further strengthening of the existing staff. In 2021, the Ministry of Interior approved the Company's request for the recruitment of 145 persons (30 workers and 115 of various specialties) from the shortlists of the 1K/2018 and 4K/2018 Competitive Calls of the ASEP. ASEP (DECEMBER 2022) for the positions of the successful candidates from the above calls, gave the opportunity for objections until 05.01.2023 and is in the process of examining them. Within 2023 we expect to complete the above recruitment.





## Analysis of employment contract type/region number (direct employees data)

EYDAP has and staffs facilities (regional centers, technical sectors, refineries, aqueducts, etc.) throughout the Attica basin and in the Prefectures of Boeotia, Fokida and Aitolokarnania.

	Men		Women		Total	
	2021	2022	2021	2022	2021	2022
<b>Attica</b>						
Permanent	1,506	1,498	703	714	2,209	2,212
Fixed-term	30	50	11	44	41	94
<b>Total</b>	<b>1,536</b>	<b>1,548</b>	<b>714</b>	<b>758</b>	<b>2,250</b>	<b>2,306</b>
<b>Viotia</b>						
Permanent	73	72	5	5	78	77
Fixed-term	0	0	0	0	0	0
<b>Total</b>	<b>73</b>	<b>72</b>	<b>5</b>	<b>5</b>	<b>78</b>	<b>77</b>
<b>Fokida</b>						
Permanent	22	24	6	5	28	29
Fixed-term	0	0	0	0	0	0
<b>Total</b>	<b>22</b>	<b>24</b>	<b>6</b>	<b>5</b>	<b>28</b>	<b>29</b>
<b>Aitolokarnania</b>						
Permanent	11	10	0	0	11	10
Fixed-term	0	0	0	0	0	0
<b>Total</b>	<b>11</b>	<b>10</b>	<b>0</b>	<b>0</b>	<b>11</b>	<b>10</b>
<b>Total</b>						
Permanent	1,612	1,604	714	724	2,326	2,328
Fixed-term	30	50	11	44	41	94
<b>Total</b>	<b>1,642</b>	<b>1,654</b>	<b>725</b>	<b>768</b>	<b>2,367</b>	<b>2,422</b>

Notes:

- Figures with an effective date as of 31.12.2022.
- **Fixed-term employees** include all types of employees who have entered into an employment contract with the Company (lawyers, doctors, engineers, students, management, board members, trainee lawyers).
- In relation to the disclosed information in the Non-Financial Report, a restatement is necessary due to the inclusion of temporary employees.





## 2022

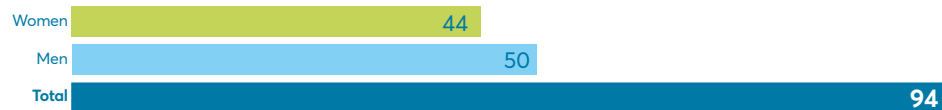
### Direct employees with a permanent type contract as of 31/12/2022 Breakdown of contract of employment/gender & type of employment/ gender

#### Contract of employment / gender

##### Permanent



##### Fixed-term (provision of services)



#### Type of employment/gender

##### Full-time employment



##### Part-time employment



#### Analysis by employee category

##### Middle management (heads, directors, deputy directors)



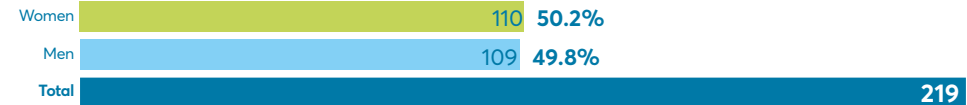
##### Senior management (executive directors & activity directors)



## 2022

### Percentage breakdown by gender of STEM Positions (technology, science, engineering)

#### Gender



#### Direct & indirect employees

	2021	2022
Direct employees	2326	2422
Indirect employees*	423	429
<b>Total</b>	<b>2749</b>	<b>2851</b>

\*Indirect employees are defined as employees who work at the EYDAP premises and whose work is supervised by EYDAP but whose direct employer is a contractor. Currently the number of indirect employees refers to all those who are employed and provide administrative services.

The recording of personnel data is as of 31/12/2022 and fluctuations are not included in the total number of staff.

## Working hours

All employees, both regular and contract staff, work full time



## 2022

### Recruitment (new hires) & departures of direct employees (permanent & fixed-term contract) as of 31/12/2022

#### Permanent recruitment\*

##### Analysis/gender



##### Analysis/age category

	Women	Men
<30 years	1	0
30 - 50 years	16	48
>50 years	1	0
<b>Total</b>	<b>18</b>	<b>48</b>

#### Fixed-term recruitment \*

Women	0
Men	0
<b>Total</b>	<b>0</b>

#### Departures of permanent staff\*\*

##### Analysis/gender



##### Analysis/age category

	Women	Men
<30 years	0	0
30 - 50 years	2	5
>50 years	6	53
<b>Total</b>	<b>8</b>	<b>58</b>

Notes:

\* Data valid as of 31.12.2022.

\*\* Of the departed (permanent employees), 2 were employees at the Company's premises in Viotia, 2 were employees at the Company's premises in Aitolokarnania, 1 was an employee at the Company's premises in the prefecture of Fokida, while the rest came from Attica.

#### Employee mobility index

Of the total of **66** employees of the Company who left during 2022, **there were no cases of involuntary departure.**

**2.83%** voluntary departure of the total number of employees

#### Employee assessment

An evaluation is carried out annually on all staff with the aim of improving their performance and making the company's operations more efficient.

#### Positioning and salary promotion

of staff is done through the annual evaluation of employees, through the Assessment Sheets, and is provided for by EYDAP's Personnel Regulation, by expertise, training and individual skills. Since 14/2/2012, however, and in application of Law no. 4048/2012, no salary promotions (maturities) are made due to their suspension, except for a salary increase in July 2022, as explicitly provided for in the 2021 Collective Labour Agreement.

#### Salary system

For all permanent employees, there is no gender or age discrimination with regard to the basic salary and benefits, which are determined by collective agreement. A lump sum is provided for within the remuneration framework, which is received on retirement from the company.

#### Proportion of the salary of the Chief Executive Officer

The ratio between the salary of EYDAP's Chief Executive Officer and the Average Salary of Employees is determined to be 1/3.9685. More specifically: CEO's annual salary / average of total employee remuneration: 188,403.17 / 47,474.51= 3.9685

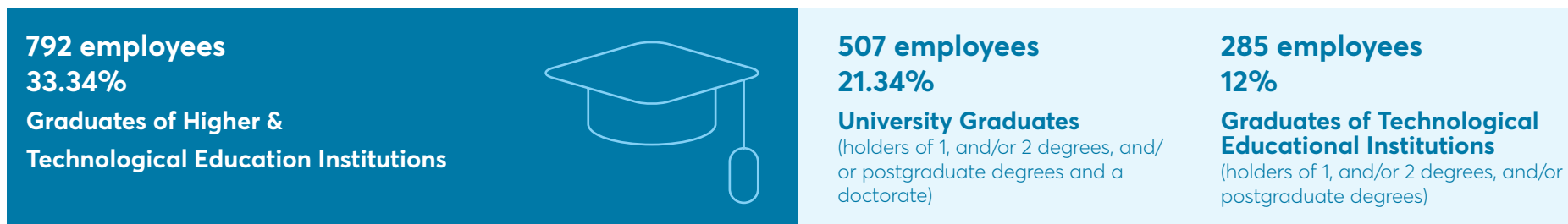
#### Percentage increase

Regarding the requirement of the ratio of the increase in pay for the highest paid to the average increase for all other employees, there has been no change based on projected increases. Any numerical changes shown in staff remuneration relate to exceptional remuneration such as overtime and overtime hours.



## Specialised training

The smooth and modern operation of the Company requires highly educated and skilled personnel. The figures relate to permanent employees.



	Higher Educational Institutions Universities			Technological Educational Institutions			Total
	Male	Female	Total	Male	Female	Total	
Not postgraduate studies or doctoral degree	120	131	251	119	100	219	470
One Master Degree	60	101	161	32	26	58	219
Two Master Degrees	12	10	22	2	5	7	29
Three Master Degrees	3	1	4				4
One Doctorate Degree	12	8	20				20
One Master Degree & One Doctorate Degree	20	22	42	1		1	43
Two Master Degrees & One Doctorate Degree	3		3				3
Three Master Degrees & One Doctorate Degree	4		4				4
<b>Total</b>	<b>234</b>	<b>273</b>	<b>507</b>	<b>154</b>	<b>131</b>	<b>285</b>	<b>792</b>

**Note:**

- These figures have been derived based on the category of the qualification and not on the category of the employee, i.e. employees who do not belong to AT (ATT1, ATT2, ATM1, ATDO1, ATY1, XN) or AP (APT3, APM2, APDO2, APY2) category but have a university or higher education degree are also counted.
- If a person has both an Higher Education and a Technical Education degree, they are counted in the higher degree category.

The data refer to permanent staff.



## Benefits for permanent employees

The Company, in the context of labor peace and stability, in addition to the statutory benefits to its employees, has additionally instituted benefits such as:

- **Health Service**, which provides primary health care services to employees and their insured family members and manages their medical and pharmaceutical coverage
- **Private insurance** for employees and their children
- **Pension insurance** for doctors, engineers and lawyers (at their request)
- **Ownership of shares**
- **Provision of expenses** for children's camps, undergraduate or postgraduate studies for employees, etc.
- **Educational cash prizes** for excellence for the children of employees' children who have passed through higher education institutions
- **Granting of interest-free loans** to cover employees' emergency needs
- **Granting of low-interest loans**, the amount of which is determined on the basis of years of service

## Workplace environment

### EYDAP applies and complies with the provisions of labor legislation.

During 2022, the Company did not observe any incidents of violation of the Labor Law, regarding the non-payment of required overtime, non-payment of statutory wages, inconsistency in the adherence to the required insurance coverage, or in ensuring the health and safety of personnel in the workplace.

The Company's main objective is the rational and objective utilization of its human resources, while ensuring personal improvement and professional development.

In order to reduce the risk of loss of know-how, but also to monitor new knowledge, special emphasis is placed on the training of all employees *The subject of employee training is discussed in the relevant chapter in the same section.* ➔

**Labor peace** is a key concern of the Company. This is achieved through constant care to ensure proper working conditions, enforcement of laws and constant awareness to minimize workplace accidents, improvement of methods and techniques, adoption of new ones, as well as enhancing job security of employees.

## Management of employees' complaints & grievances

Under the **Whistleblowing Policy**, the internal whistleblowing mechanism deals with the collection and examination of practices that are not in compliance with the Labor Regulation and Corporate Policies, through the Regulatory Compliance Department.

At the same time, for grievances, the prescribed procedures for their resolution are followed within the services of the respective Directorates. For the above issues, in addition to the written and electronic information provided to the Staff, appropriate training seminars have been provided.

## Support for young people

### Student employment

#### 55 students of Technological Education

as part of the **mandatory internship for students of higher education** institutions either started or completed their internship in Company's Services, gaining substantial knowledge and training in their field of study.

### Employment through NSRF

#### 13 students

were employed for a **two-month period** at the Company's facilities and in their field of study. These institutions have been implemented for a number of years and have provided valuable knowledge and high quality experience and internship to a large number of students.





## Volunteer employee activities with an environmental focus

Employee participation in a voluntary action of planting

### 230 trees in Aspropyrgos,

at the foothills of the Poikilos Mount as part of the Company's action "Mazi tha kanoume to harti oxygono" ("Together we will turn paper into oxygen") in cooperation with We4All, sending a message about the importance of volunteering, the role of water and ecosystems.

Κόψε τον λογαριασμό, φύτεψε ένα δέντρο,  
και άφησε το πότισμα σε εμάς...  
eBILL: Μαζί θα κάνουμε το χαρτί... οξυγόνο!  
Γιατί, για κάθε 5 λογαριασμούς που μετατρέπονται σε ψηφιακούς,  
φυτεύουμε ένα δέντρο, σε συνεργασία με τη we4all.



### Cleaning of the "Marikes" beach

with the voluntary participation of 24 employees through the PARALIES PROJECT

The recycling of the collected quantities of recyclable waste corresponds to the carbon benefit resulting from a forest of 8.78 acres.



## Protection of personal data of Human Resources

In the context of the proper functioning of the Company and its contractual and legal obligations, and in particular in the context of social security or labor law, the employees themselves constitute a basic category of data subjects.

EYDAP considers its human resources to be a key pillar of its operation and takes constant care to protect their personal data throughout its activities, showing full respect for the individual freedoms and rights of employees.

EYDAP, through its **Employee Data Protection Policy**, informs its employees about the processing of their data by the Company and, where applicable, they are asked to sign individual forms-declarations to ensure that they are informed. This information is updated in proportion to that of the Company's activities, but also more specific Notifications on individual processing, providing in each area multi-level clear and specific information to staff regarding the processing of their personal data. Policy of EYDAP Insured (for the processing carried out at the level of health coverage), CCTV Policy (for image processing carried out in full respect of the instructions of the competent supervisory authorities as regards proper recording, special markings, proper placement and at specific points of cameras for a specific purpose).

In the context of highlighting the respect for privacy in the workplace and protecting the right of informational self-identification of each employee, clear procedures and privacy policies have been created for the safe exercise of such complaints, whether they are part of the Whistleblowing complaints system or relate to a complaint related to the prevention and combating of Violence and Harassment at work.

The same respect extends to staff provided by partners and contractors of partnership contracts with EYDAP.

### The personal data of our human resources are protected by:

- Taking the necessary technical and organisational security measures in the facilities and systems where the data are kept
- Establishment of Restricted Access Policies, Information Systems Security and Confidentiality Clauses.

### The special categories of data (health-related data) of our human resources and pensioners are protected by:

- taking technical and organisational security measures in the facilities and systems where the data are kept
- the establishment of Restricted Access Policies, Information Systems Security and Confidentiality Clauses.
- Clear information policies

The medical staff are bound by medical confidentiality and third party partners through strict contractual commitments for any processing of special categories of data.

Both staff and policyholders are facilitated in exercising any relevant rights by establishing simple and clear procedures for exercising processing, evaluation and satisfaction of requests. This process is regularly filtered and re-evaluated by the Data Protection Officer.

**In the reporting period there were no fines for personal data breaches**

Further reference to Data Protection issues is made in the sections:  
"Corporate Governance" →  
"Labor Practices" →  
"Secure Customer Service-Affordable Tariff" →





## 4.4 Talent Attraction & Retention

The recruitment framework, which the Company undertakes from time to time, is fully compliant with the applicable legislation and is either through ASEP or through fixed-term contracts. In all cases, new recruitments are aimed not only at meeting immediate needs, but at the same time at attracting new talent and enhancing the skills of the newly recruited employees. The clear definition of the formal and substantive qualifications of the candidates will help to attract the appropriate human resources in accordance with the provisions of each Directorate, in order to maximise the potential of the employees and to meet the service needs that arise, particularly in the field of new technologies.

**Financial incentives for further training and specialisation, free training seminars, and regular staff evaluation contribute substantially to the attraction of new talent and the proper management of existing competent and talented staff.**



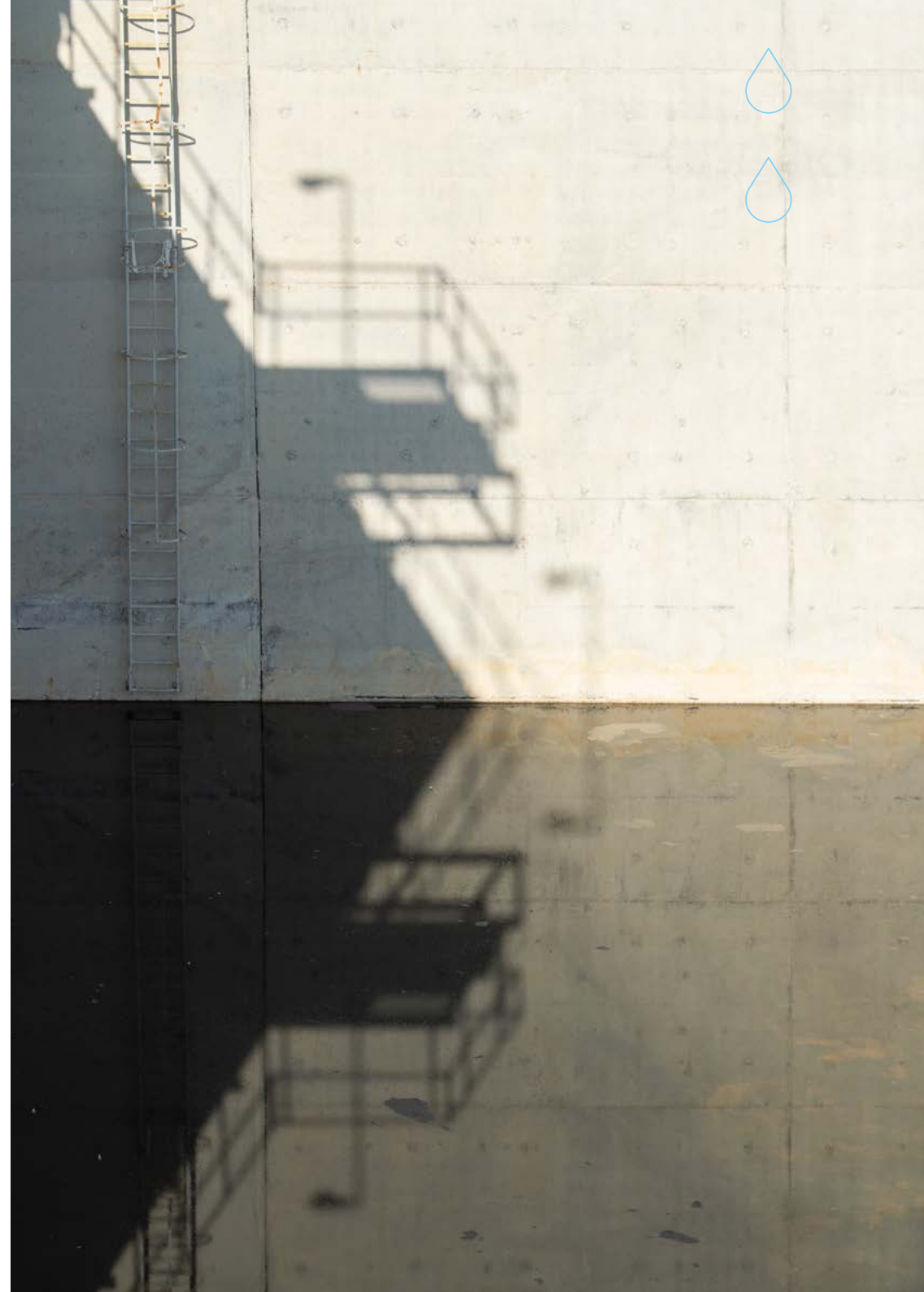
## MATERIAL TOPIC

# 4.5 Employee Training & Development

In line with its corporate strategy and business objectives, EYDAP invests in the training and development of employees' skills both at professional and personal level, as they are its most valuable asset, either by implementing training programs or by encouraging participation in seminars/conferences outside the Company.

In an era of rapid economic and technological changes, it is imperative to equip human resources with the necessary knowledge, skills and abilities to effectively meet job requirements, enhance knowledge dissemination and ensure corporate continuity.

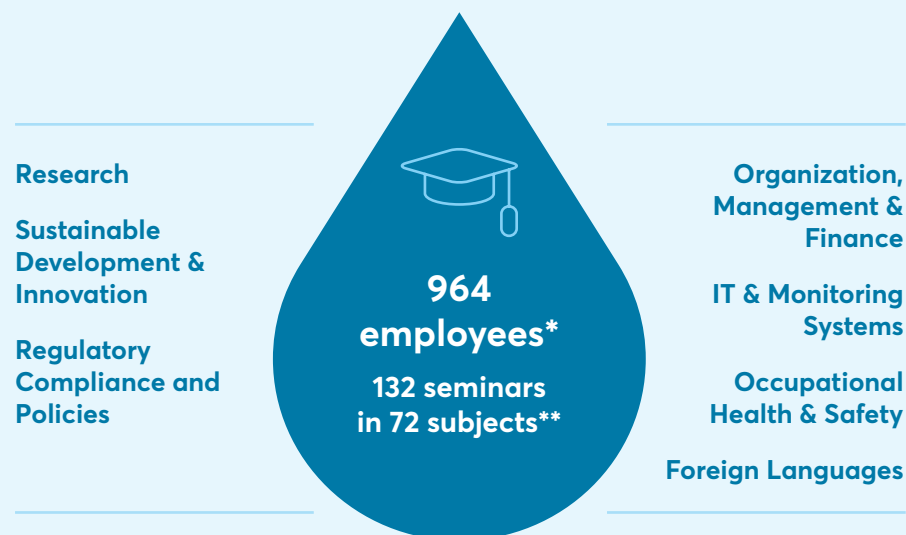
**In this context, the training program of the HR Training Department is aligned with the Company's strategic priorities and the Department is certified with ISO 9001:2015 Quality Management System in the design and implementation of training programs.**







## Training programs 2022



### Training subjects:

#### 1. RESEARCH, SUSTAINABLE DEVELOPMENT & INNOVATION:

seminars **10** - trainees **284** - training hours **65**

#### 2. ORGANIZATION, MANAGEMENT & ECONOMICS:

seminars **25** - trainees **1,071** - training hours **459**

#### 3. IT & MONITORING SYSTEMS:

seminars **13** - trainees **346** - training hours **387**

#### 4. OCCUPATIONAL HEALTH & SAFETY :

seminars **11** - trainees **600** - training hours **271**

#### 5. FOREIGN LANGUAGES:

seminars **7** - trainees **82** - training hours **508**

\* An employee may attend more than one seminar. Therefore, the individual number of trainees in the different modules is not the same as the total unique number of trainees.

\*\* A subject may consist of several seminars - sections.

More specifically on the subjects

### Regulatory Compliance and Policies

Course title	Trainees	Training hours
General Data Protection Regulation	159	42
Regulatory Compliance and Policies	36	5
Whistleblowing Policy	54	8
Conflict of Interest Policy	53	8
Prevention of violence and harassment at work	53	16
Implementation of Law 4412/16, as amended by Law 4605/19 and subsequent laws	131	15
<b>Total</b>	<b>486</b>	<b>94</b>

### Occupational Health & Safety

Course title	Trainees	Training hours
Safe removal and disposal of asbestos materials	158	16
Confined Space Entry and Work	34	16
Fire Protection Team Training and Certification	17	18
Internal emergency and risk management plans. WTP operation scenarios	27	8
Operation and Maintenance of E/M Facilities, equipment for Chlorine Unit, Sodium Hypochlorite and Chemical Processing ( Polyelectrolyte, Aluminium)	22	10
Safety Measures and Work - Inspection of Electrical Installations HD 384	32	20
First Aid Hands On Course	194	96
Road Safety for Professional Drivers	19	20
Digital Data Protection - Cyber Crime	39	15
ISO 9001:2015 Quality Management Systems. Requirements Analysis, Internal Inspectors	26	32
Forklift and lifting truck operators - Breakdown diagnosis - Repair - Maintenance - Inspection	32	20
<b>Total</b>	<b>600</b>	<b>271</b>



## Human Resources training on data protection

For EYDAP, Personal Data Protection, in addition to the obligation to establish Policies and Procedures, is important as it concerns all its employees, as bearers of the Company's guidelines. As such, they are therefore required to implement the procedures and properly manage the personal data issues that arise during their work (communication with consumers and external partners, processing of data of other colleagues, etc.).

**Since the entry into force of the General Data Protection Regulation, targeted training programs have been organized, in person or remotely.**

In 2022, staff training was carried out by developing information material via e-mails with tips: on topics such as personal data protection, malware, social engineering and phishing, mobile devices, use of e-mail, visiting websites, protection of equipment during leave or in the case of remote working, following on from training already carried out with the aim of establishing desirable user behaviours.

In addition, a Cooperation Guide was distributed to all organisational units "Don't Forget GDPR" with concise instructions on how to ensure security data processing by design. In addition, in cooperation with the Department of Education were implemented by an external partner, training programmes on the General Data Protection Regulation Personal Data Protection Code.

## Goals for 2023

- Continuing the interactive training process of staff through targeted e-learning programs in order to assess their awareness and understanding of the established policies and procedures that the company has incorporated in its regulatory compliance framework
- The completion of a manual of office procedures and the development of a specific system for monitoring the compliance of the organizational units of EYDAP in case of findings and vulnerabilities resulting from the updating of the activity record.
- Through internal collaborations of the HRM office with the Cybersecurity Directorate, Data Governance Directorate, Risk Management Directorate, Compliance Directorate to develop a strong mechanism for proper and lawful data management, so that the data generate value for both the company and the people with full respect to ensure their privacy and confidentiality.

*Further reference to Data Protection issues is made in the sections:*

*"Corporate Governance"*

*"Labor Practices"*

*"Secure Customer Service - Affordable Tariff"*





## Average number of human resources training hours by employee category/gender

Data as of 31/12/2022

The calculation has been made on the basis of the total number of

**2,804 employees**

direct employees: permanent and fixed-term contract, receipt for services rendered and indirect employees

The number of employees who received training does not include trainee lawyers and students as there is no provision for them to participate in training programs. Also not included here are Board members whose training is analyzed separately below.

**34,2%**  
of staff participating in training

**23,638,50**

Total number of man-hours of training

**8.43**

Average number of employees' training hours

**23.38**

Average number of training hours for employees in a position of responsibility

**6.91**

Average number of training hours of employees without position of responsibility

Total number of employees trained		Man-hours of training	Average training hours
<b>Total employees trained</b>	<b>964</b>	<b>23,638.50</b>	<b>8.43</b>
Men	<b>468</b>	<b>8,682.50</b>	<b>4.80</b>
Women	<b>496</b>	<b>14,956.00</b>	<b>15.02</b>
<b>Heads - Directors</b>	<b>192</b>	<b>6,054.50</b>	<b>23.38</b>
Men	<b>73</b>	<b>1,612.50</b>	<b>14.27</b>
Women	<b>119</b>	<b>4,442.00</b>	<b>30.42</b>
<b>Employees without position of responsibility</b>	<b>772</b>	<b>17,584.00</b>	<b>6.91</b>
Men	<b>395</b>	<b>7,070.00</b>	<b>4.17</b>
Women	<b>377</b>	<b>10,514.00</b>	<b>12.37</b>

## Training of new employees or employees who have taken a new position

It is carried out according to emerging needs at the request of the relevant organisational unit

## Senior management training: 2 ESG seminars

## Training of Board Members

In the context of promoting collective knowledge and skills to guide and revise the company's policies and strategy, Board members attended the following topics:

- Risk management issues: June 2022, duration 5 hours. Participation of all Board members (13 persons).
- Cyber security issues: November 2022, duration 5 hours. Participation of all Board members (13 persons).

## Evaluation of the training program

Each seminar is evaluated by the participants and the presenter on the last day of the seminar. At the end of each six-month training period, using an open and closed questionnaire, an evaluation is carried out by the organizational units involved in the Company.

In the first training semester, 38 seminars were evaluated, with very positive feedback, and in the second semester 42 seminars were evaluated.

As shown in the corresponding ISO 9001:2015 Quality System evaluation form, the average number of evaluations completed by the trainees is **9.31** and **9.23** respectively.

At the end of the training period the organizational units evaluate the effectiveness of the seminars they proposed. Based on the feedback received, we update and incorporate the units' comments in the next training program.

## Life-long learning

EYDAP provides the opportunity for its employees to obtain a degree or a postgraduate degree or specialization from Technological and Higher Educational Institutions, covering most of their tuition fees and providing them with the statutory student leaves (14 or 20 days per year).

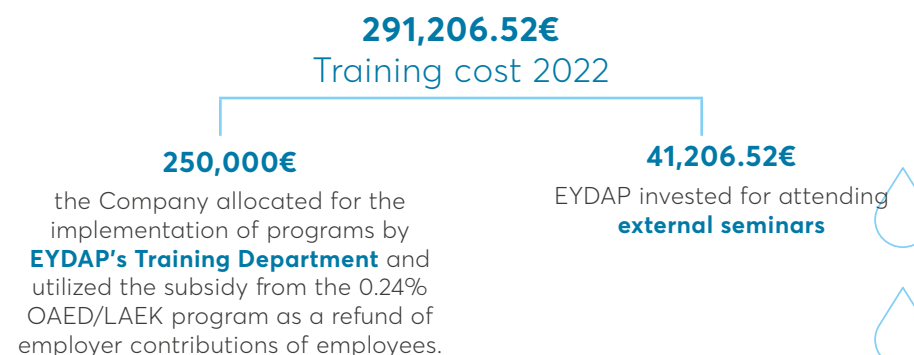
In 2022, the Company supported **5** undergraduate and **13** postgraduate studies of its employees

## Participation in seminars and conferences organized by external partners

Executives in a position of responsibility, employees and fixed-term employees are encouraged to attend events, exhibitions or conferences, domestic or international, with full coverage of costs, in order to keep abreast of new technologies and new data in various scientific fields related to the scope of the respective organizational units.

In 2022, **128** employees were trained outside the Company:

With a position of responsibility		Permanent employees		With a fixed-term contract employees	
Men	Women	Men	Women	Men	Women
29	60	8	12	12	7
Total: 89		Total: 20		Total: 19	







## Partnerships

EYDAP through the Training Department, in cooperation with the Strategy & Innovation Division, participates in EU co-funded actions such as the program of Erasmus+ (CATALIST) "European VET Excellence Center for Leading Sustainable Systems and Business Transformation" which was attended by 3 of its executives. The Company's engineers also participated in the 7th International Summer School on Liquid and Biosolid Waste Management Training, organized by the Hellenic Open University in order to adopt best practices in waste management.

In July 2022, the Water Academy workshop entitled "Nature-based Solutions

in Urban Water Management in Greece", co-organised by the Sustainable Development Unit (SDU) of ATHENA RC and EIT Climate-KIC, took place at Marathon Dam, aiming to enhance knowledge and overcome existing barriers to address water scarcity in Southern Europe through innovation, entrepreneurship, education and communication.

**Starting from this initiative, which was launched in July 2022, the aim is to create the "Academy of Sustainable Water Management" in synergy with academics, scientific institutions and Company executives with specialized knowledge in the relevant field.**





## MATERIAL TOPIC

# 4.6 Supply Chain Management

For EYDAP, supply chain management is directly intertwined with the formulation and execution of all actions and activities related to the procurement, production and distribution processes as well as the full coordination of all parties involved in all stages of material flow, with the adoption of sustainable strategies.

Taking into account the direct and indirect impacts of global conditions due to climate change and pandemic as well as short/long-term instabilities in local and international markets (such as the recent energy crisis), EYDAP examines the potential operational risks it faces, mainly financial, operational and reputational, adopts and implements sustainable practices and an integrated approach to identify, assess and minimize them through appropriate controls, so as to manage and control series of reactions because of any prolonged adverse circumstances.

The logistics network is about processes:

1. procurement, storage, supply assurance, handling and disposal of materials
2. transport management with the management, planning and maintenance of vehicles and machinery
3. obtaining the required services



**Proper supervision is carried out with the help of an ERP information system (SAP B1) covering the following main activities:**

- Accounting and Operations
- Reporting Logistics, Warehouse management
- Planning, Budgeting and Forecasting
- Procurement
- Vehicles management



## Our impacts

### Regulatory Framework - Implementation of National and EU Procurement Legislation

The supply chain needs are met both from the domestic and international markets, but also **in full compliance with the National Legal Framework on Public Procurement**, as defined by Law No. 4412/2016, as amended and in force (Government Gazette A' 147/08-08-2016), the Public Procurement of Works, Supplies and Services (adaptation to Directives 2014/24/EU and 2014/25/EU), the secondary institutional framework as well as the New Regulation on Procurement and General Services of EYDAP, in force as of 1.7.21.

An equally serious challenge and statutory imperative concerns the monitoring of the compliance of the cooperating suppliers/service providers with the definitions of Law 4412/2016.

The legal and contractual obligations, as well as the internal regulations governing the operation of EYDAP require the strict compliance with the Law on the minimum requirements for the public solicitation of suppliers/service providers, their equal treatment, the procedures and criteria for the appointment of the Contractor, the supervision, remedial measures and the management of complaints/objections and the confidentiality of sensitive information and data concerning the Company and the suppliers/service providers, as defined in the relevant law "on confidentiality".

### Tender procedure - Attraction of new economic operators

The terms of the contracts are publicly accessible elements of the notices through public postings both Nationally (Regionally) on digital networks such as

- the Electronic Online Repository of Administrative Acts
- the Central Electronic Register of Public Procurement
- the National System for Electronic Public Procurement

as well as European

- the Publication Annex of the Official Journal of the European Union and on the website of EYDAP SA.

Both during the invitation and selection of the contractors and during the implementation of the contract, the communication procedures with the contractors provided for by the legislation on public procurement and the terms of the respective contract are observed and the contractors are checked for compliance with the terms by committees competent for the subject of the contract, both during their selection on the basis of evidence submitted (certificates or statements of quality and environmental management) and during the execution of the contracts for its proper implementation.

### Integration of sustainability principles - Protection of Human Rights

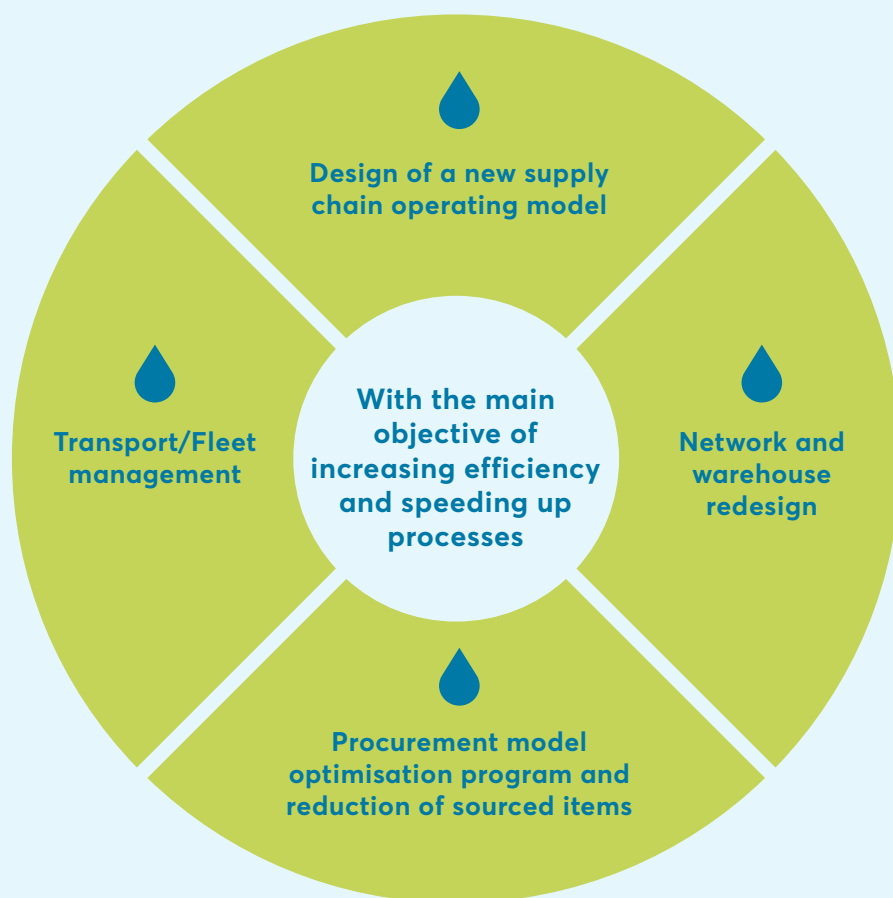
**In November 2022, EYDAP adopted a Human Rights Policy which also binds the Company's partners: contractors, suppliers, service providers, etc.**

To the extent that the National Legal Framework on Public Procurement allows, EYDAP SA has incorporated, and faithfully applies in its supply chain contracting procedures, the terms of compliance of Suppliers/Service Providers with the UN Global Compact Principles in the areas of Human Rights, Labor, Environment and Corruption, ensuring that **all Supply Chain Suppliers/Providers of Services implement practices that promote respect for human rights and are consistent with the Company's policies on social, labor and environmental issues.**

**In addition to the contractual obligation** to comply with the provisions of environmental, social security and labour legislation, established by EU law, national law, collective agreements or international provisions of environmental, social and labour law, which are listed in Annex XIV of Appendix B of Law No. 4412/2016 and depending on the scope, **the contractors shall provide evidence such as certifications for quality, environmental, labor, energy management (ISO 90001, FCS, ISO 14001, 45001, 50001).**

## Ongoing supply chain optimisation projects

The optimisation projects concern the general redesign of the supply chain in terms of organisation, operations, warehouse network, transport and stocks, optimising operating costs, increasing efficiency and speeding up processes.



## Long-Term agreements

With regard to **long-term agreements**, it is noted that they are **compatible with the principles of free competition**, subject to the following conditions:

- they must have been concluded following tendering procedures,
- the technical specifications of the products or services must be clear and detailed,
- they must be governed by mutual obligations and rights of the contracting parties; and
- be subject to periodic checks to ensure that they remain competitive.

## Highly competitive tendering procedures

In tendering procedures of high importance and with a high economic scope, EYDAP conducts tenders published at European level, in order to ensure the participation of major suppliers, active in both the domestic and the European business scene, thus ensuring the development of healthy competition.

A recent example is the tender procedure for the operation and maintenance of the **Psytalia Wastewater Treatment Plant**. In 2022, a contract was signed between EYDAP and the Consortium AKTOR ATE - ABAX SA - ERGOTEM ATEBE for the provision of services for the "Operation and Maintenance of the Wastewater Treatment Plant of Psytalia (WWTPP)", for a total amount of approximately €141,022,800.00 plus VAT, for a period of 5 years, plus the right of extension. The contract concerns the operation and maintenance services of the Wastewater Treatment Plant of Psytalia and provides for major interventions for the modernization and operational as well as energy upgrading of the plant.

## Physical and financial subject in 2022

- **286** Contracts with a total value of approximately € 201.2 million, plus VAT, between EYDAP and suppliers/service providers (80 were for Supplies and 206 for Services)
- **202** Private Agreements for Contract Amendments or Contract Terminations.
- **14** Project Contracts, with a total value of approximately € 90.85 million plus VAT
- **2** Study contracts, with a total value of € 497,000 plus VAT
- **9** Contracts for the provision of technical and other related scientific services, with a total value of € 551,500 plus VAT





## Compliance by suppliers

In 2022, with regard to compliance with public legislation by suppliers/service providers, there was one (1) incident of non-compliance with the terms of the contract due to non-performance of contractual obligations. A letter of guarantee was forfeited.

There were no other cases of recidivism, default or violation of labor and insurance legislation and, as a result, termination and forced termination of the contract.

The implementation of the Whistleblowing Policy, which includes a system of raising concerns, ensures the operation in a professional manner, and the prevention even of any suspicions of unfair practices or corruption or conditions of improper activity.

## Training and education of employees

to better respond to the ever-expanding and changing modern institutional framework governing procurement procedures for supplies and services.

The consistent adaptation to the continuous amendments of the provisions of Law 4412/2016, the New Procurement and General Services Regulation of EYDAP SA, the compliance with article 344 of Law 4412/2016 (as amended by Law 4782/2021, article 133) "Training and Certification of the staff of Contracting Authorities/Applicating Bodies" is addressed by the Company through the continuous training of its staff, ensuring the reliability of the procedure and giving a competitive advantage to the Company.

Since 2016, the year of implementation of Law 4412 to date, the Company has implemented a series of specialized seminars and training programs so that the staff of the respective service units **are certified in the Procedures for Preparation, Award and Execution of Public Contracts, in accordance with Book II of Law 4412/2016 implemented by EYDAP.**

In 2022, **31** persons were trained in **10** training subjects.

The subjects were mainly related to:

- The application of Law 4412/2016 following amendments to Law 4605/2019 and subsequent laws
- the Procurement and General Services Regulation of EYDAP
- the drafting of Tender Notices for the award of Public Procurement Contracts for Supplies and Services
- the General Data Protection Regulation and the Conflict of Interest Policy

## Regulatory Compliance

In 2022, there were no cases of acts or omissions that posed regulatory compliance risks and there was no incident of non-compliance by EYDAP, as a contracting entity, during the procedure of conducting tender procedures for the procurement of supplies and services.

During the same year, the audit of the respective committees did not identify any incidents of non-compliance by the suppliers with the provisions relating to:

- child labor,
- forced labor,
- participation in a criminal organisation,
- bribery and corruption,
- fraud,
- committing acts of terrorism or more generally committing crimes linked to terrorist organisations,
- money laundering by suppliers
- environmental legislation and climate change

## 4.7 Local Community MATERIAL TOPIC

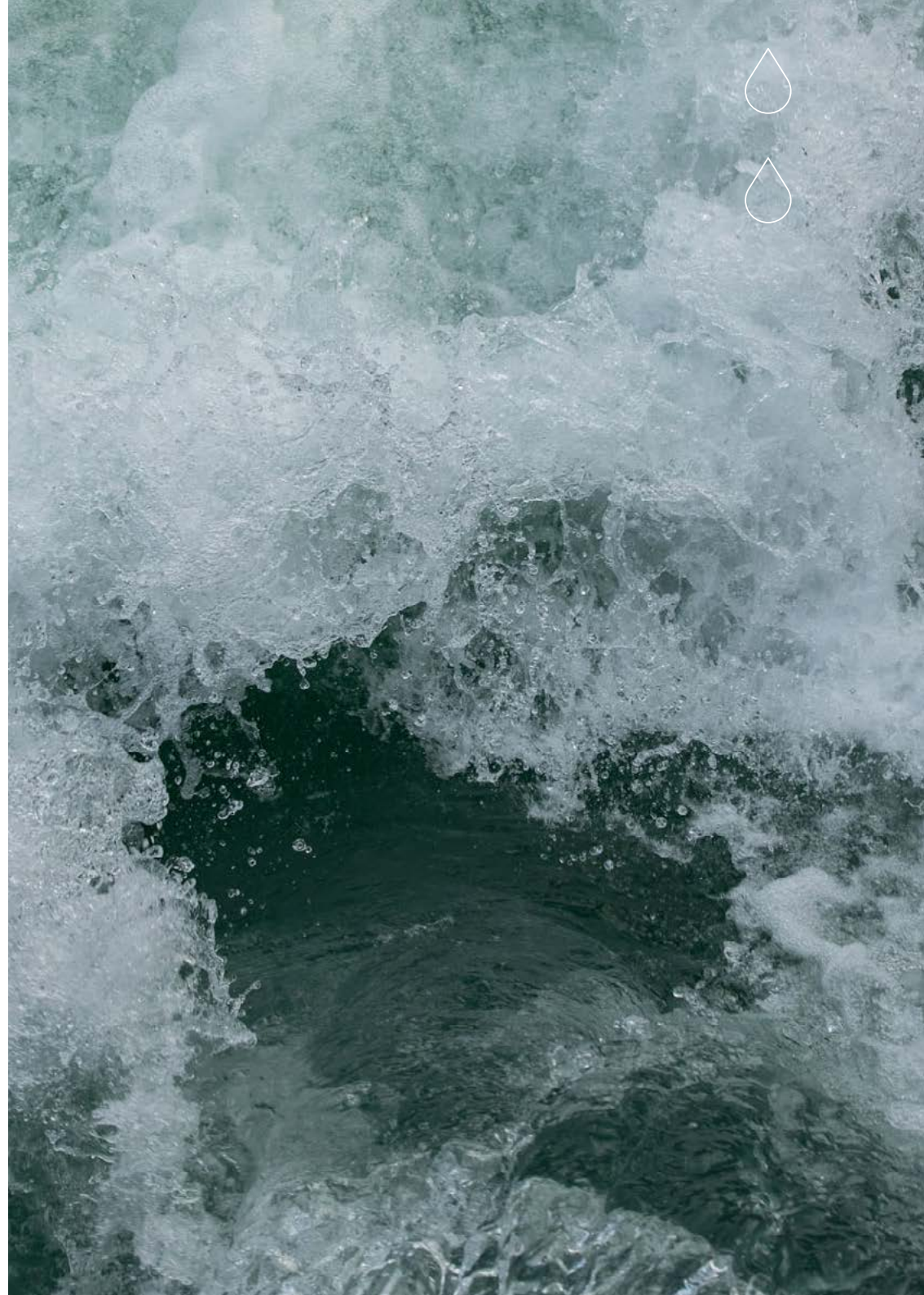
### Environmental Awareness

EYDAP, recognizing its responsibility to actively contribute to the improvement of society, the environmental awareness of citizens and the cultivation of environmental culture, continues to develop programs and actions to strengthen its social footprint.

#### Support for vulnerable social groups

In recognition of the need to support vulnerable social groups, EYDAP has undertaken important initiatives, beyond those defined by the relevant Regulatory Framework, through its Tariff Policy, bearing the loss of revenue itself.

*Detailed reference is made in the section "Secure Customer Service - Affordable Tariff" of the same Report.* ➔



## Social assistance initiatives



EYDAP, in order to protect the health of citizens, intervenes



even in areas outside its competence



in cases of emergencies by providing equipment and human resources



by providing free drinking water (municipal units of Nea Makri and Rafina)



in the summer of 2022, during the outbreak of fires in areas of Attica, in order to ensure the continuous supply of drinking water of excellent quality. It also carried out extraordinary sampling and additional analyses and informed the competent authorities of the results.



to support the Navy with the systematic provision of laboratory analysis services for ship water. In addition, support is occasionally provided by conducting analyses to the Environmental Inspectorate, etc.

## EYDAP in the framework of Social Inclusion



provides accessibility to our services through the corporate website for visually impaired people through specially designed services



is working on the possibility to serve the hearing impaired (deaf/hard of hearing) through remote interpretation



published the summary of the Sustainable Development Report 2021 in the form of a talking document available on the corporate website [eydap.gr](http://eydap.gr)



## Sponsorship Policy EYDAP

In 2020, by decision of its Board of Directors, EYDAP adopted a Sponsorship Policy which is posted on the corporate website [eydap.gr](http://eydap.gr) and which defines the basic principles of sponsorships, as derived from the Company's Strategy and priorities, the characteristics that should govern the sponsored actions and the process of their implementation.

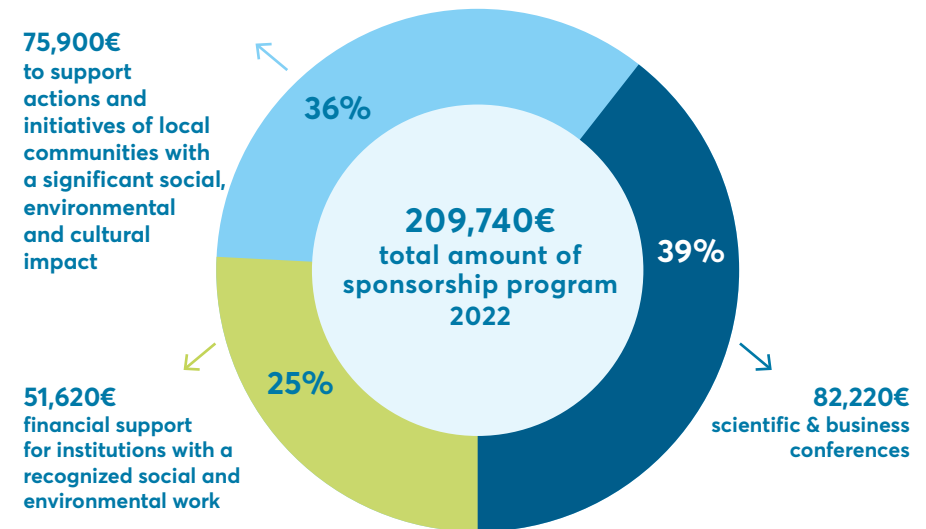
In 2022, EYDAP, within the framework of the institutionalized Corporate Sponsorship Policy, consistently continued its sponsorship program, strengthening the constructive relationship it has built over time with social stakeholders.

### Sponsorship program 2022

The sponsorship program supports important actions in areas directly linked to

- a) its corporate culture and growth strategy
- b) the broader impact of its business activities,
- c) its substantial contribution to social well-being
- d) the Global Sustainable Development Goals.

### The distribution of sponsorships



In 2022, EYDAP SA, following a recommendation by EYDAP NISON DEVELOPMENT S.A., proceeded to the free allocation of five vehicles of different types to the Sitia Crete DEYA for its needs and the delivery took place in February 2023.





## Support for young people

### EYDAP Scholarships

In 2020, the Company established 2 scholarships per year to PhD level students who are implementing their doctoral thesis at universities within Greece and in subjects related to water and wastewater management. The scholarships are awarded in cooperation with the State Scholarship Foundation.

At the beginning of 2023 the evaluation of applications and the selection of the first candidates for the academic year 2022 - 2023 was completed.

#### The subjects of the doctoral theses are

1. "Experimental Investigation and Optimal Control of an Energy Autonomous Electrofiltration Process for the Removal of Nitrate Ions from Aquifers"
2. "Study of Advanced Oxidation Processes for the Removal of Organic Microrobacteria from Water"

In June 2023, the Call for the 2nd Cycle of the SSE-EYDAP Scholarship Program- for the academic year 2023-24 was posted.

### Digital Innovation Competition

Completion of an original, open technological innovation competition, announced in November 2020 in collaboration with the Innovation Network of HCAP and MIT Enterprise Forum Greece with the participation of start-up companies, teams of scientists, university research centers, etc.

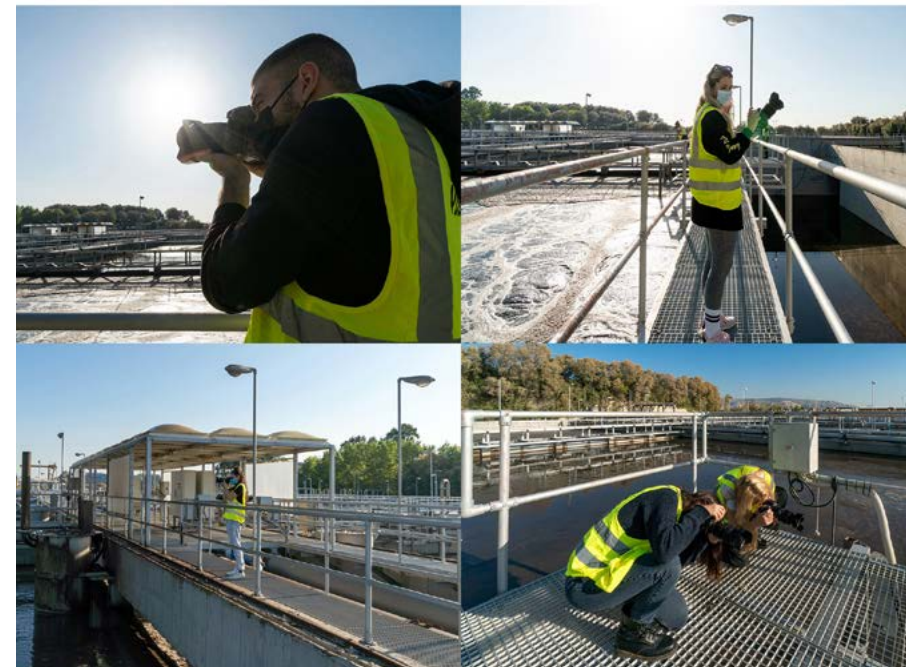


### Financial awards for excellence

for the children of employees who are successful in higher education institutions

### Photographing of Installations - Students' Practical Training

The Company continued its cooperation with the Leica Akademie Greece Photography Academy, for the purpose of practical training - photography of the Company's facilities, within the framework of the course **"Photographic Applications (Industrial Photography)"**. 15 students visited and photographed the facilities of Thriasio WWTP and 15 students visited and photographed the facilities of Marathon.





## Partnerships

- For the exploration of specialized water quality issues, EYDAP often collaborates with **Greek Educational and Research Institutions** (NKUA, NKEFE Demokritos, Hellenic Atomic Energy Commission, etc.), which are among the pioneers in their field in Europe
- with the **Ministry of Culture and Sports**, the **Region of Attica** and the municipalities concerned, for the promotion of Hadrian's Aqueduct.
- **with the Department of Conservation of Antiquities & Works of Art of the School of Applied Arts and Civilization of the University of West Attica**
  - for the conservation of tools of historical importance with the participation of 40 students
  - 4 diploma theses concerning the conservation of industrial objects of the Museum. The aim is to complete a further two degree projects
- Supporting **research of students at postgraduate and doctoral level by providing material of historical**

## Environmental Awareness Actions

**Continuous enhancement of our digital services, with the aim of reducing our environmental footprint**

**Continuation of the action "Together we will make oxygen out of paper" in cooperation with WE4ALL: for every 5 paper bills that are cancelled, a tree is planted.**



**Κόψε τον λογαριασμό, φύτεψε ένα δέντρο, και άφησε το πότισμα σε εμάς...**

**eBILL: Μαζί θα κάνουμε το χαρτί... οξυγόνο!**  
Γιατί, για κάθε 5 λογαριασμούς που μετατρέπονται σε ψηφιακούς, φυτεύουμε ένα δέντρο, σε συνεργασία με τη we4all.

In 2022, 15,200 water supplies abolished their paper bill for the first time while registering for the e-bill.

**World Water Day 2022. Organization of a series of activities on Water Week 2022 under the title "EYDAP for the water of tomorrow"**

- On March 21st, pilot launch on of the **new educational** program for primary school students on the Marathon Dam entitled **"Breaking the Engineering Barrier"**.
- On March 22nd, Organization of an open discussion on **"Water for the city and the city for water"** with the support of the UN and the European research project Fiware4water
- On March 23rd, **voluntary tree planting** by EYDAP employees in cooperation with We4All in Aspropyrgos.
- On March 24th, awarding of prizes of the open competition of technological innovations, in cooperation with the HCAP Innovation Network and MIT Enterprise Forum Greece EYDAP's innovation competition to start-ups, in the framework of the EYDAP Innovation challenge.

**The entire Water Week 2022 was awarded the Silver Award in the Environmental CSR category at the Boussias Environmental Awards 2022**



**Participation in the Generation 17 initiative in line with UN Goal 6 "Clean Water and Sanitation".**

The artist STMTS created a mural at 32 Pericles Street, Athens.



**Adoption of Marikes Beach in Rafina**

for the entire summer season (June-September 2022), as part of Project PARALIES.





## Environmental education programs

EYDAP successfully conducts environmental education programs at its facilities, aiming to inform and raise awareness of the new generation on sustainable water management and environmental protection.

**In 2022, the programs were attended by**

**4,680 students** from 103 schools

**336 students** from 8 University Departments

**15 students** from the International Centre for Mediterranean Studies

**700 people** from 10 associations

**A total of 5,731 people**

- **In the Water Treatment Plants (WTP) in Galatsi.** The educational program "**Stagonoulis' Journey**" has been awarded the gold prize in the Environmental Leadership category at the **Environmental Awards** and is addressed to primary and secondary school students.
- **At the Marathon Dam.** The educational program takes place in a renovated stone building from 1926.
- **The Wastewater Treatment Plant of Psytalia,** which is one of the most modern Wastewater Treatment Plants in Europe, receives visits from students, scientific teams and delegations from Greece and abroad.
- **At the Aspropyrgos Water Treatment Plant,** the educational program is addressed to young people of all educational levels, as well as other stakeholders, who are guided through the Company's facilities and are mainly informed about the water refining process.



## EYDAP's presence in social media

Since 2013, EYDAP has had an active presence in Social Media on Facebook, Instagram, LinkedIn, Twitter and YouTube, while monitoring developments and considering the creation of pages on new platforms.



highlighting the company's environmental and social profile.





## 4.8 Cultural Heritage Management

In 2018, EYDAP established a **Historical Archive Management Policy**, defining the procedures for the unified establishment and preservation of the valuable historical archive of the water supply and sewerage projects of the Capital

In its Historical Archive, EYDAP preserves, records and documents all kinds of documents, such as paper and photographic material, audiovisual material, as well as various objects dating back to the beginning of the 20th century. In addition, it creates the appropriate conditions for the preservation of the original physical form and digitises in accordance with international standards, thereby seeking to maximise the preservation and conservation of digitised material of historical importance.

**The Historical Archive of EYDAP refers to Hadrian's Aqueduct, the construction projects of the Marathon Dam, the water supply projects of Athens-Piraeus and Surroundings (of the period 1925-1931) as well as the projects of Yliki and Mornos.**





## EYDAP cultural network

**The Network, through the adoption and development of a single policy, implements actions that highlight the Company's cultural contribution.**

**In 2022, EYDAP**

- Completed the identification, cataloguing and clearing of the Company's preserved archives per Organizational Unit, created the corresponding digital map per building and Service. The inventory of records marked as historically significant amounts to 1300 meters.
- Reconstructed EYDAP's "Historical Organizational Chart" from the establishment of the company until today
- Designed and produced the corporate photo album "EYDAP: A century of sustainable development" highlighting its history, expertise and work over time through a series of photographs
- Created the geometric HYDRO font designed exclusively for the EYDAP Historical Archive and based on a series of technical and construction drawings and diagrams, reflecting the diligence, precision and technique of the engineers of the 1930s. The font is available on the company's website [eydap.gr](http://eydap.gr)
- Documentation and storage of 250 objects, tools and furniture of historical importance
- Strengthening the culture of evaluation and archiving of historical record material



## Donation of historical material 2022

EYDAP:

- Supported the Symposium and lent historical material to the **exhibition UNDER THE LANDSCAPE "Learning from below: the case of the Thera land"**, organized by the interdisciplinary collective Boulouki from 26/6 to 24/7, in Santorini and Thirassia, in the framework of participatory research projects on the two islands, aiming at the dialogue between different fields of knowledge that develop around the study of landscapes.
- Provided historical material to FOSS PRODUCTIONS on behalf of COSMOTE HISTORY, for the creation of a **documentary on the 100 years of the Asia Minor disaster**.
- Provided historical material to **"Marketing Greece"** in the context of its cooperation with the British newspaper **"Guardian"** and the Italian lifestyle magazine **"The Good Life"** on Hadrian's Aqueduct
- Provided material to Laika Productions for the **ERT2 series "Kleinon Asty"**, under the title **"Aquatic Athens"**
- Provided historical material in the context of the book under publication with the title "Water and modernity in Athens: From the Municipality of Athens to Ulen, 1830-1940"
- Provided photographic material for the publication of 5 albums to institutions.



## Goals for 2023

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Creation of an **archive of oral testimonies** of executives, employees, workers in order to preserve the financial, technological and social history of the company in cooperation with external partners

---

Creation of archive series, **digitisation**, documentation and input of historical material into appropriate software

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Collaboration with institutions and research bodies to **digitise audiovisual material** in 4k resolution from 1926, capturing important aspects of the Company's history

---

**Preservation of 1,600 photographs** of the Society's activities from 1947 to 1977

---

Creation of a **permanent home for the historical archive** based on specifications we have drawn up

## Development of a corporate social responsibility system following the SA 8000 standard

EYDAP is in the process of developing a SA8000 Corporate Social Responsibility system, with the aim of certifying EYDAP according to the most recognized international standard SA 8000, strengthening its social identity and improving its performance and image of corporate social responsibility.

## Hadrian's Aqueduct

### Integrating Hadrian's Aqueduct into the modern era

In 2021, aiming at the integrated promotion and exploitation of an important technical project of the Roman era, Hadrian's Aqueduct, EYDAP started a cooperation with the Ministry of Culture and Sports, the Region of Attica and the Municipalities interested, which will gain significant advantages in terms of irrigating the area but also in terms of creating entertainment and cultural spaces.

*(Detailed reference to this issue in the section "Sustainable Management of Natural Resources/Water Sources" of the same Report). ➔*

EYDAP is in the final phase of signing a Memorandum of Understanding and Cooperation with the Ministry of Culture and Sports for the management and utilisation of its water.

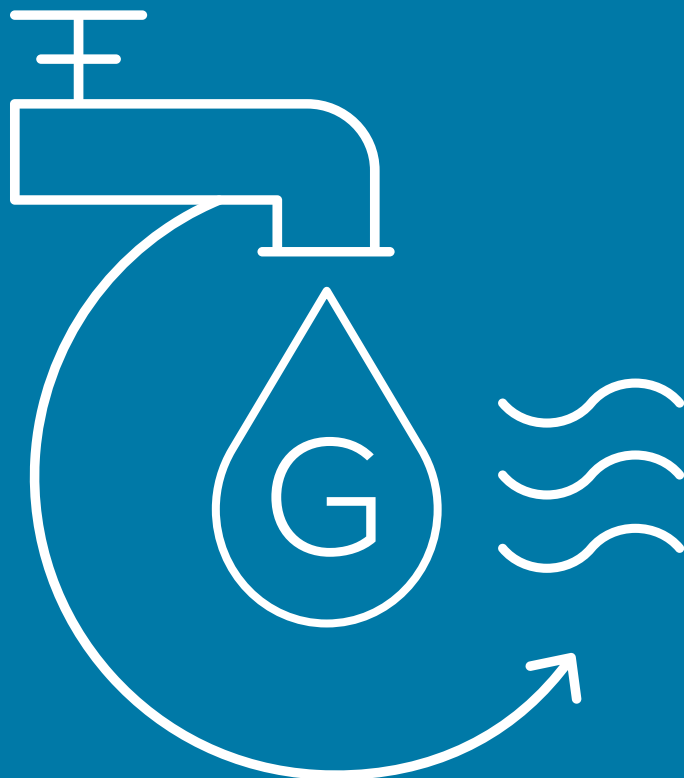


### Cooperation and actions for the restoration of Hadrian's Aqueduct

- EYDAP continued its cooperation with the **New Jersey Institute of Technology of the USA**, for the development of visualization tools for Hadrian's Aqueduct, in order to facilitate the awareness of the relevant stakeholders and the community around Hadrian's Aqueduct regarding the protection of the water resource and the education of the community on how to operate it. The visualization tools were delivered to EYDAP and the partners of the UIA Cultural HIDRANT pilot project through the implementation of a related knowledge dissemination workshop.
- On the occasion of the World Day to Combat Desertification and Drought, which brought the message "Let's all rise up together to fight drought", EYDAP designed a special campaign for social networks, inviting users to register in the **"Drop A Message"** application and send their own messages against drought, through the historically important ancient tunnel of Hadrian's Aqueduct. At the same time, with a question game on Instagram, it tried to highlight the value of non-potable water, such as Hadrian's Aqueduct, which can provide circular economy solutions to the climate crisis
- **Public awareness initiatives and interest events were organized by EYDAP to connect to the new non-potable water network of Hadrian's Aqueduct in cooperation with the Municipality of Halandri and the partners of the project.**
  - educational activities for students of all levels from schools of Chalandri
  - targeted group tours by company bus to interested parties along the entire length of the aqueduct
  - open guided tours for the public to wells in Halandri, as part of the HIDRANT FESTIVAL.
- EYDAP together with the other partners of the CULTURAL HIDRANT project participated in the organization of the event "Water as a common good -Examples of participatory and community-based management of water resources and networks", marking the beginning of the process of **creating a water community around Hadrian's Aqueduct.**

### Honorary awards for Hadrian's Aqueduct

*A detailed report on the subject is given in the "Corporate Awards" section of the same report. ➔*



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## 5.1 Corporate Governance

EYDAP with the Board of Directors' decision No. 20905/7.7.2021 adopted the Greek Corporate Governance Code of the Greek Corporate Governance Council in accordance with article 17 of Law 4706/2020 and the decision of the Securities and Exchange Commission No. 2/905/03.03.2021.

The Board of Directors of the Company defines and oversees the implementation of the corporate governance system and ensures the adequate and effective operation of all internal control mechanisms and procedures, including risk management and regulatory compliance, thus ensuring the safe and efficient operation of the Company.

### Corporate Governance System

The Board of Directors of the Company is responsible for ensuring the adequate and effective operation of the Company's Internal Control System which aims, among other things, to identify and manage the material risks associated with the Company's business and operations.

### General Meeting of Shareholders

**The General Meeting of Shareholders of the Company is the highest body of the Company and is entitled to decide on any matter concerning the Company.**

In accordance with the applicable legislation, the Company discloses all information related to the General Meeting of Shareholders in a manner that ensures easy and equal access to all Shareholders.

All disclosures and related documents are communicated on the Company's website [eydap.gr](http://eydap.gr) in Greek and English on the date of their disclosure.

The Company publishes and posts on its website specific information regarding the preparation of the General Meeting and information on its activities.

The powers and functioning of the General Meeting are detailed in the Company's Operating Regulations and in the Annual Management Report of the Board of Directors. (*Reference to the annual report p. 84*)



## Board of Directors

The Board of Directors is the highest governing body of the Company, which primarily formulates the Company's strategy and development policy, and supervises and controls the management of its assets.

It adopts and implements the Sustainable Development Policy, which is fully aligned with its business strategy, mission, vision and values. The Board of Directors is responsible for the management and representation of the Company and its activities in general, and takes all appropriate measures and decisions to achieve the Company's purpose. It monitors the progress of the Company and the implementation of its activities.

The Board of Directors shall be informed of EYDAP's key risks and shall retain ultimate responsibility for the implementation of an effective risk management framework. The responsibilities of the Board of Directors include:

- i. Strengthening the risk culture and staff awareness of proper risk management.
- ii. Establishing appropriate governance structures and processes to manage operations and risks.
- iii. The oversight of risk management, including safety nets.
- iv. Ensuring the implementation of the risk management framework across the Company.
- v. Approving the framework for risk allocation across the Company.
- vi. Receiving reports for evaluations on the adequacy and effectiveness of the risk management framework.
- vii. Reviewing any risk information provided by the CEO and the Risk Management Committee annually or on an ad hoc basis as deemed necessary.

The Board of Directors consists of 13 members, executive, non-executive and independent non-executive members, in accordance with the provisions of Law 4706/2020.

The Board of Directors approved by decree 20960/15.12.2021 its Operating Regulations, in accordance with the principles of the **Code of Corporate Governance** it has adopted, which describes the way it meets and takes decisions as well as the procedures it follows, taking into account the provisions of the Articles of Association and the provisions of the law, for all matters within its competence.

**The Board of Directors may delegate the powers of management and representation of the Company** to one or more persons, members or not.

The Board of Directors may also delegate the internal control of the Company to one or more persons, not members of the Board of Directors. The aforementioned persons may, if provided for by the resolutions of the Board of Directors, further delegate the exercise of the powers conferred on them or part thereof to other members of the Board of Directors or to third parties.

The Chief Executive Officer or, with specific authorisation from the Board of Directors, a member of the Board of Directors or an employee of the Company in any relation to the Company or a lawyer of the Company, **shall represent the Company before the courts** and any authority and shall take the oaths administered to the Company.

### Executive Committee

According to Article 21 of the Statutes, the Board of Directors may delegate some of its powers or duties to the Executive Committee which shall be established by decision of the Board of Directors. In implementation of the above statutory provision, by Board decision No. 21144/21.12.2022, an Executive Committee was established and operates, consisting of the CEO, the Deputy CEO, the General Directors and the Directors of Finance, Activities and Supply Chain Operations (until the position of the General Director of Finance and Supply Chain Operations is filled).

The CEO, who is responsible for the planning and conduct of the meetings, has been appointed as Chairman of the Executive Committee. In fulfilling its duties, the Executive Committee takes into account the decisions of the Board of Directors delegating to it defined powers or responsibilities of the Board of Directors, the legal and regulatory framework, the financial situation, the business strategy, the long-term interests and sustainability of the Company, and other parameters at its discretion. The tasks of the Executive Committee and its operation are described in detail in its Operating Regulations, which were approved by Board Resolution No. 21144/21.12.2022.



## Supervision of Sustainable Development by the Board of Directors

The Board of Directors ensures the supervision and management of the Company's Sustainable Development issues, within the framework of the Company's strategic planning. During its meetings, it discusses objectives related to sustainable development issues.

Within the framework of the Sustainability Policy, the Board of Directors identifies in the Annual Management Report the non-financial issues that are deemed essential for the implementation of its strategy, taking into account the requirements of its stakeholders. The Report shall include a reference to the way they are managed and the evaluation of these actions on the basis of recognised international standards.

The Board of Directors shall be assisted by the Strategy, Innovation and Sustainable Development Committee in all the above responsibilities.

## Role of the Board of Directors in the disclosure of non-financial information

The annual non-financial reporting is an integral part of the Annual Financial Report which is approved by the Board. The Board is also actively involved in the identification and rating of material Sustainable Development issues. The Audit Committee of the Board reviews EYDAP's Sustainable Development Policy and reports to the Board as appropriate and at regular intervals. *Further information is presented on page 72 of the Annual Financial Report.*

The Strategy, Innovation and Sustainability Committee reviews and approves the process of defining the substantive issues of Sustainable Development, endorsing, where appropriate, the results of this process, which form the structure of the annual Sustainability Report, the content of which it approves.

## Appointment of Board Members

The General Meeting of Shareholders is competent to determine the number of members of the Board of Directors, as well as to increase or decrease them. The number of its members shall be redundant and may not exceed thirteen (13) members or be less than seven (7).

The Board of Directors shall consist, as provided in the Articles of Association:

- a)** of two (2) representatives of the employees of the Company elected (with their alternates) by direct and universal suffrage.
- b)** two (2) members representing the minority shareholders, elected in the manner set forth in Article 36 of the Articles of Association.
- c)** by representatives of the shareholders, elected by the General Assembly in accordance with article 11 of the Articles of Association and the provisions of Law 4548/2018.

The independent non-executive members shall not be less than one third (1/3) of the total number of Board members and, in any case, shall not be less than two (2).

The Company recognizes the importance of promoting the Diversity Principle in the composition of its Board of Directors, in its senior management, as well as in all of its employees, with gender, age, experience, skills and knowledge as key parameters, among others, and ensures that there is no exclusion on the basis of discrimination based on gender, race, color, ethnic or social origin, religion or belief, property, disability, age or sexual orientation.

This aspect extends beyond the selection of Board members to the provision of training for Board members and it is the Company's objective to increase the participation of women on the Board. The Corporate Governance Statement, with reference to the Nomination Policy, the proceedings of the Board Committees, the composition and functioning of the Board, the CVs of the Board Members, the information regarding the remuneration of the Board Members, the Sustainable Development Policy etc. followed by the Company are contained in the Annual Management Report of the Board.





## Nominations Policy

The individual suitability of the Board members is assessed by whether they have the requisite knowledge, skills and experience to perform their duties in view of the role, position and the pre-requisite competencies required by the Company for the position. The level and type of education (field of study and specialisation) shall be taken into account. Experience covers both practical and professional experience. A Board member is presumed to be of good repute, honesty and integrity, unless there are objective and demonstrable reasons to suggest otherwise. The CVs of Board Members are posted on the corporate website [eydap.gr](http://eydap.gr).

The Remuneration and Nomination Committee monitors the suitability of the Board members on an ongoing basis, in particular to identify, in the light of any relevant new event, cases in which a re-evaluation is deemed necessary.

## Conflict of Interest Policy

The members of the Board of Directors and any third person to whom it has delegated responsibilities are subject to the provisions of EYDAP's Conflict of Interest Policy. In order to prevent and detect relevant incidents, Board members shall submit, upon taking up their duties and on an annual basis, the independence declarations provided for in the Policy. The management of conflict of interest issues follows the described procedures for identifying, assessing, monitoring and taking remedial action in any case where a conflict of interest situation may create risks in not complying with the requirements of the regulatory framework of corporate governance. Stakeholder notification is provided for in the approved Conflict of Interest Policy.

This Policy which is posted on the Company's website [eydap.gr](http://eydap.gr) includes all measures for preventing/dealing with Conflict of Interest incidents.

## Training Policy of Members of EYDAP Board of Directors

The program of continuous education of the Board members is decided on an annual or biannual basis, depending on the needs of the Company, the needs of the Board as a whole or of individual Board members and the developments in the markets and the legislative framework, as well as the findings of the reports of the Board evaluations. The Company's Remuneration and Nomination Committee is responsible for the preparation of this training program.

The training is divided into introductory and continuous training. The Policy is posted on the corporate website [eydap.gr](http://eydap.gr)

The scope of the training may be varied and/or modified according to the needs of the trainees, taking into account, inter alia, the results of the Board of Directors' evaluation.

A detailed reference to the training of the 2022 Board members is made in the section "Employee Training & Development" of the same Report. →



## Remuneration Policy for Board Members

The members of the Board of Directors are entitled to receive remuneration or other benefits in accordance with the law, the provisions of the Articles of Association and the Remuneration Policy of EYDAP. Remuneration or benefits granted to a member of the Board of Directors and not regulated by law and the Articles of Association shall be borne by the Company only if approved by a special resolution of the General Meeting, subject to the provisions of Articles 110 to 112 of the Law. 4548/2018.

Since the immediate objective for the Company is to improve its performance and results, the Company grants executive members additional incentives in the form of variable remuneration linked to short-term and/or medium-term corporate objectives.

The Remuneration and Nomination Committee annually recommends to the Board the establishment and revision (when required) of KPIs, the targets to be achieved and the percentage of variable remuneration in case of their achievement (the amount of variable remuneration granted should not exceed 15% of the fixed remuneration of the executive members; see section 5.2.1.1.2 of the Company's remuneration policy). In addition to the annual objectives, there is the possibility to set additional long-term objectives, which will be evaluated over a period of time, e.g. 3 years. These are approved by the Board of Directors and receive final ratification by the General Meeting of Shareholders.

In addition, by decision of the Board of Directors, additional extraordinary variable remuneration may be paid to executive members linked to the achievement/completion of a strategic objective, the amount of which shall not exceed the gross basic remuneration of two monthly salaries. The target linked to the additional one-off variable remuneration is a recommendation of the Remuneration and Nomination Committee and approved by the Board of Directors. The additional extraordinary variable remuneration and the timing of its payment are proposed by the Remuneration and Nomination Committee, approved by the Board of Directors and receive final ratification by the General Meeting of Shareholders

*A detailed reference to the CEO salary ratio is made in the section "Labor Practices" of the same Report.* ➔

## Remuneration of Senior Management

Senior Management consists of the executives who, through an evaluation process, have been appointed to the positions of General Directors and Independent Directors. The remuneration of the executives and other employees is based on the Labor Law and the Collective Agreements. *A detailed reference to this issue and to the benefits provided to employees beyond the Regulatory Framework is made in the section "Labor Practices" of the same report.* ➔ *and in the section "Obligations for staff benefits" (amount of lump-sum, pension, health coverage, personal reason for leaving the service) which is included in the Annual Financial Report p. 200.* ➔

## Responsibilities of the Chairman of the Board of Directors

The Chairman of the Board of Directors presides over the Board.

The role of the President is to organise and coordinate the work of the Board of Directors and is responsible for the overall effective and efficient operation and organisation of its meetings, determines the items on the agenda, convenes meetings of the members of the Board of Directors, places items on the agenda at the request of the CEO and conducts its meetings.

At the same time, he promotes a culture of openness and constructive dialogue in the conduct of the work of the Board of Directors, facilitates and promotes the establishment of good and constructive relations between the members of the Board of Directors and the effective contribution to the work of the Board of Directors of all non-executive members, ensuring that the members of the Board of Directors are provided with timely, complete and accurate information.

The President ensures that the Board as a whole has a satisfactory understanding of the views of shareholders and ensures that the Board communicates effectively with shareholders with a view to treating their interests fairly and equitably and developing a constructive dialogue with them in order to understand their positions.

The President presides over the Board's evaluation process in collaboration with the Remuneration and Nomination Committee.

The President shall be evaluated by the Board in relation to the performance of his duties, a process which shall be chaired by the Remuneration and Nomination Committee.



## Board evaluation

EYDAP has an approved **Nominations Policy**, which is posted on the corporate website [eydap.gr](http://eydap.gr). It details the applicable individual suitability criteria and provides for succession planning for Board members to ensure smooth succession and continuity in management decision-making. The Board members were assessed in 2022 by an external assessor of recognised standing using broad criteria across the full range of corporate governance issues, including ESG criteria.

*A detailed report on the process of assessing the Executive Directors is made in the Annual Report..*

## Policies and Regulations

As part of the Compliance System and the implementation of best practices, the Company establishes, implements and updates Policies and Procedures.

The Policies reflect the Company's commitment to safeguard the interests of stakeholders and the proper functioning of the Company as a proactive means of reducing its negative impacts, and bind the members of the Board of Directors, all employees and partners of the Company. The Policies are approved by the Company's Board of Directors, communicated to employees through training and updates and posted on the Company's website [eydap.gr](http://eydap.gr).

The Compliance Department ensures continuous information, raises awareness of compliance issues among managers and staff and implements training programs. In addition, it ensures the training of the above, regarding the implementation of the policies and procedures adopted by the Company, in order to formulate and cultivate a "culture"/ compliance culture. The executives of the individual departments are responsible for the implementation of the policies and compliance with the commitments embodied in them, in their area of responsibility.

Corporate Governance Code	Greek Corporate Governance Code of the ESED
<b>Publication 2022</b>	
Number of Board Members	<b>13</b>
Term of office of the Board of Directors	<b>4 years</b>
Chairman of the Board of Directors	<b>Non-Executive Member</b>
CEO	<b>Executive Member</b>
Deputy CEO	<b>Executive Member</b>
Number of Executive members of Board of Directors	<b>2</b>
Number of Non-Executive members of Board of Directors	<b>11</b>
Number of independent Non-Executive members of Board of Directors	<b>4</b>
Average age of members of the Board of Directors	<b>54</b>
Voting system	<b>Majority vote</b>
Number of meetings of the Board of Directors	<b>26</b>

## Committees

Corporate Governance Code	Greek Corporate Governance Code of the HCGC
Audit Committee (3 Members)	YES
Percentage of Independent Members in the composition of the Audit Committee	66.66%
Remuneration and Nomination Committee (5 Members)	YES
Percentage of Independent Members in the composition of the Remuneration and Nomination Committee	60%
Risk Management Committee (5 Members)	YES
Number of Non-Independent Members in the composition of the Risk Management Committee	3
Strategy and Innovation Committee (and already Strategy, Innovation and Sustainability Committee) (5 Members)	YES
Nominations Regulatory Compliance Committee (5 Members)	YES

\*The responsibilities of the Committees are detailed in the Annual Financial Report p. 69-79 ➔

**EYDAP's Audit Committee** is, according to the decision of the Extraordinary General Meeting of Shareholders of 24-12-2021, a committee of the Board of Directors of the Company. It consists of three (3) non-executive members of the Board of Directors, the majority of whom are independent, with proven sufficient knowledge in the field in which the Company operates.

The operation of the Audit Committee of the Board of Directors of EYDAP is governed by the provisions of Law no. 4449/2017, as amended by Law No. 4706/2020, the decisions of the Securities and Exchange Commission as well as its Operating Regulation, which defines the purpose, jurisdiction, election, composition, powers, responsibilities and mode of operation of the Committee. The Board of Directors' Audit Committee's Operating Regulations were approved by the Board of Directors' Resolution No. 18958/15-07-2016 and updated by the Board of Directors' Resolution No. 21549/5.7.2023.

The Audit Committee prepares an Annual Report on its work, which is submitted to the Board of Directors and to the Annual General Meeting of Shareholders.

This report includes a description of the sustainable development policy followed by the company.

## Internal Control System (ICS)

The Company has an adequate and effective Internal Control System (ICS), in terms of financial and non-financial reporting, in order to effectively manage operational risks arising from the conduct of its activities, as well as from changes in the regulatory and legal framework governing its operations, which may result in legal sanctions and fines for non-compliance.

The reporting model of the ICS includes the auditing environment, risk management, auditing mechanisms and safeguards, information, communication and monitoring system of the ICS, through a set of Principles, Regulations, Policies, Procedures, Safeguards and organisational structures, designed to provide reasonable assurance as to the accuracy and reliability of accounting and operational data.

The design of the structure and monitoring of the ICS is based on the adoption of the Three Lines Model, defining roles and responsibilities in different areas and the relationship between them.

*Detailed description of the ICS is made to the Annual Report.*







## Risk Management

EYDAP is committed to operating in the light of corporate governance principles across the full range of its activities.

Its objectives are:

**the continuous compliance** of the Company with national and European legislative and regulatory provisions, which regulate its organization and operation, as well as its activities.

**the development** of a framework for self-regulation of the Company's operation by establishing rules that are complementary to the existing regulatory framework and are adopted with a view to enhancing the sound and responsible management and operation of the Company..

**to ensure** the transparency, integrity, functionality and effectiveness of the Company's existing system of corporate governance and internal control.

**to strengthen** the confidence in the Company, its employees, partners and customers.

Within the framework of regulatory compliance, the Risk Management Unit manages the risks of non-compliance with institutional and regulatory requirements of corporate governance. It has included in the register all relevant risks for which the control mechanisms are applied to ensure compliance with the Corporate Governance Code, the legal framework and EYDAP's Internal Control System.

The Company promotes the concept and has developed processes to integrate business ethics in decision-making and is committed to safeguarding the interests of Shareholders and other stakeholders.

EYDAP manages its operational risks through a process of identifying, evaluating, managing and controlling potential events or situations to provide reasonable assurance regarding the achievement of its business objectives in accordance with the requirements of the COSO Enterprise Risk Management Framework (COSO ERM Framework). Operational risk management is an integral part of corporate strategy formulation and is implemented by the Company's Board of Directors, management and staff.

Operational risk management seeks to enhance the knowledge and understanding in the Organisation of risk management by making the link - where possible - to the operational performance of the Organisation. It also seeks to bring added value to the entire Company through risk assessment and

risk management activities that enable it to identify, prioritise and assess its operational risks. The result of these activities is the creation of a risk profile against which the Company is able to coordinate and direct its resources to the most significant risks.

## Non-Financial Risks

**The Company identifies and has included in the Business Risk Register, which is updated at least annually, the ESG Risk category.**

Through an ongoing compliance program, the Company places particular emphasis on the effective response and management of potential risks and acts to continuously monitor and update these risks. It records all Risks arising from its operations and overall activities in a Risk Register and the respective organizational units define the systems, processes and control mechanisms in place to identify and mitigate catastrophic risks as a result of the Company's activities or business operations.

The Risk Management Department interpreted the **new Climate Law 4936/27.05.2022** and assessed the new risks arising from it, with the result of including them in the Risk Register and informing the respective organizational units in order to take the necessary measures and safeguards to mitigate the consequences.

Management involves identifying, assessing, monitoring, responding/responding to risks and issuing appropriate system support reports. The objective of the operational risk management framework is to create transparency through systematic management of operational risks.

In compliance with the current Regulatory Framework and by decision of the Board of Directors of the Company:

- A Risk Management Department was established, with the aim of developing and implementing an operational risk management framework and implementing all necessary actions for the full and continuous compliance of the company with the regulatory framework by adopting and implementing appropriate and updated Policies and Regulations.
- A Risk Management Committee was established, consisting of members of the Board of Directors, which reports, through its Chairman, to the Board of Directors, as well as the Operating Regulations of this Committee, which define its purpose, competence, election, composition, powers, responsibilities and mode of operation.



## MATERIAL TOPIC

# 5.2 Fight Against Corruption

**EYDAP acknowledges that corruption and bribery undermine the ethical environment of any business and constitute a complex problem with economic, social, environmental and political implications.**

The Company, through the adoption of an Anti-Corruption and Bribery Policy in line with the European Policy and the Greek Anti-Corruption Action Plan, is committed to conducting its entire range of activities with transparency, ethics, integrity and respect for society and the environment, implementing a Zero Tolerance Policy against Corruption and Bribery.

**Regulatory compliance is a key element of EYDAP's business.**



## Our impacts

The design of preventive actions against corruption reduces the risk of fraud and enhances the Company's market value, as it is a practical demonstration to stakeholders of the commitment to good corporate governance and corporate social responsibility.

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Within the framework of the **"Anti-Corruption and Bribery Policy"**, which was drafted in line with international best business practices and the specific needs and corporate culture of EYDAP:

- Covered persons are the members of the Board of Directors, senior and top management and all employees of the Company regardless of the type of employment relationship.
- An analysis of the circumstances and identification of potential risks or threats that may encourage the existence of such incidents in the corporate environment is carried out through a process of thorough screening and due diligence.
- Covered persons are encouraged to disclose any matter or suspected wrongdoing as soon as it comes to their attention and, in the event of a good faith report, are protected from any acts of retaliation with respect to their position and advancement. Incidents reported shall be investigated by the Company in an appropriate manner and if confirmed, corrective action shall be taken.
- Non-compliance may lead to disciplinary action, which may result in dismissal for gross misconduct as, under the disciplinary provisions of the Company's Personnel Regulations, non-compliance may cause material or moral damage to the Company. Furthermore, the person involved may be subject to criminal prosecution under the applicable Greek legislation.



The **control mechanisms**, which are found in all corporate functions and involve all personnel, consist of a system of policies, procedures and practices and are applied in relation to the management of existing risks, taking into account the cost-benefit ratio. These mechanisms concern, inter alia, the standardisation of operations and the reduction of exposure to operational risks.

The control mechanisms applied to information systems also play an important role. This position is based on the non-negotiable principle of compliance with the requirements of the law and the commitments voluntarily undertaken by the Company on the basis of the quality and operational standards it has adopted and best corporate practices. The strengthening of the Internal Control System is a further enhancement of the Company's position and credibility.

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**Adoption of Conflict of Interest Policy:** the Company adopts a Conflict of Interest Policy in order to fulfil its obligations to maintain and implement adequate and effective control procedures and mechanisms regarding the prevention, identification, management and response to existing and potential conflict of interest situations, in compliance with the applicable legislation on corporate governance and the Public Procurement Law.

In the context of dealing with situations constituting a conflict of interest and ensuring the implementation of the Conflict of Interest Policy, it has adopted a procedure both for the submission of a conflict of interest declaration by the covered persons and the signing of a declaration that they are aware of the content of the aforementioned Policy and that they are committed to complying with its content.

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**Adoption of the Sponsorship Policy:** EYDAP has adopted and applies a Sponsorship Policy, which identifies the basic principles of its sponsorship activity, as derived from its Strategy and priorities, the characteristics that should govern the sponsored actions and the beneficiaries, as well as the process to be followed up to the final stage of their implementation.

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**Adoption of a Fund Operating Regulation**, which establishes a Fund Audit Team in order to ensure compliance with the relevant instructions and procedures described in the Regulation and the security of transactions. Also, the Company adopts a "Policy for the management of imprests - Small Funds EYDAP SA", which sets out the procedures to be followed by each Service Unit of the Company.

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**Enhancing transparency by implementing the relevant procedures** resulting from the applicable institutional framework and in particular from the stock exchange legislation, such as the procedure for disclosure of regulated information, accurate and timely information to the investing public, the procedure for disclosure of transactions by persons exercising managerial functions in the Company, the procedure for avoiding the misuse of privileged information and publication of important corporate information on the Company's website, the publication of its financial statements on the Internet portal of the Hellenic Capital Market Commission, submission and publication of the statement of the 'asset declarations' of the persons liable.

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**Adoption of enhanced accountability practices** such as the issuance, distribution and publication of corporate publications that enhance information about the Company's activities, strategy, objectives and performance.

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Adoption of the **Corporate Governance Code of the Greek Corporate Governance Council** (June 2021)

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Implementation of the **Internal Staff Regulation**, which establishes principles of ethics and professional conduct, particularly in the context of transactions with consumers. Cases of disciplinary misconduct related to the violation of the Personnel Regulation (Decree 597/1985) and the Internal Staff Regulation are dealt with by the Company's Disciplinary Board.

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In the area of **public procurement**, the Company's competent organizational units strictly apply the procedures of Law 4412/2016 "On Public Procurement of Works, Supplies and Services", as amended and in force. In this context, the

Company has established the "Procurement and General Services Regulation of EYDAP SA"

*Special reference is made in the section "Supply Chain Management" of the same Report.* ➔

Also, in addition to the existing practices of the Company, the prevention, identification, monitoring and management of conflict of interest situations during the design and preparation of a contract, as well as during its award and execution will be implemented from the year 2021 onwards through the implementation of the Conflict of Interest Policy and the specific provisions included in it.

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**Safeguarding the security of the collection of Personal Data of employees and customers. Transparency in the mechanisms for managing personal information**

The Company, with respect and responsibility to comply with the regulatory framework on Personal Data Protection (General Data Protection Regulation (EU) 2016/679 (GDPR), Law No. 4624/2019, v. 2472/1997, as in force under the individual provisions, Law No. 3471/2006 in the electronic communications sector), has established Mechanisms, Policies and Compliance Control Procedures.

In order to **ensure the collection and general management of personal data of individuals with whom it deals** (employees, customers, suppliers, contractors, shareholders) and transparency in the mechanisms for the management of personal information, EYDAP adopts the following **Policies**, which it updates from time to time, such as: Code of Conduct, TPE Equipment Management Policy, EYDAP Employees' Personal Data Protection Policy, Consumer Data Protection Policy, Personal Data Protection Policy for the Award and Execution of Public Contracts, Video Surveillance Systems Policy, Website Users' Privacy Policy, Shareholders' Data Protection Policy, Whistleblowing Policy, Information Security Policy, Whistleblowing Policy.



### Information Security Policy

In the year 2022 the company updated the Video Surveillance Systems Policy, adopted a Policy on Prevention and Combating of Violence and Harassment at Work, adopted a Human Rights Policy.

In specific cases of **tenders**, it creates clear and specific policies for the transparent information of the Subject as to the processing of his/her data by the competent Services of EYDAP, checking from the design of an activity/process the lawfulness of the processing.

**The Company's staff, appropriately trained** in personal data management issues, in order to limit the risk of voluntary or unintentional disclosure of information, ensures before the processing of data that the legality of the procedure is checked, with the assistance of the Data Protection Office

- adopting specific Information Policies, respecting the principles of legality, transparency and confidentiality of information
- taking the necessary technical and organisational measures
- being alert to prevent the detection of vulnerabilities in order to limit the risk by strengthening data protection measures and safeguards

**Digital governance (e-eydap):** Through the digital expansion of its services, EYDAP reduces the chances of illegal transactions and corruption. The provision of services is depersonalized, the consumer is identified electronically and the processing procedures are recorded in detail so that their quality and legality can be monitored.

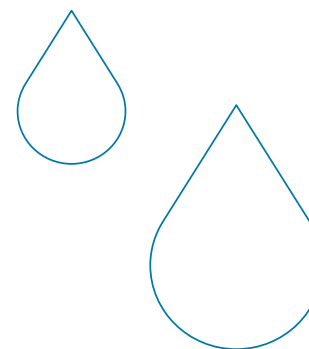
**Updating the recording and assessment of the risks** faced by each organisational structure of the Company, in order to ensure their proper management and effective response, so as to prevent, among other things, incidents of corruption and bribery.

### Establishment of independent Risk Management and Regulatory Compliance Units

*Detailed reference to this issue is made in "Corporate Governance" section of the same Report →*

**Establishment of a Whistleblowing System:** The Policy defines the internal mechanism for filing reports and the procedure for their management, in compliance with the principle of confidentiality of the identity of the complainant and ensuring non-retaliation. The Policy clearly describes the methods of submitting a complaint (by e-mail ([whistleblowing@eydap.gr](mailto:whistleblowing@eydap.gr)), or by post to EYDAP SA - Regulatory Compliance Service) and the procedure for their receipt and evaluation by the Petitions Evaluation Committee.

**Updating Regulations and Policies** at regular intervals in order to ensure continuous compliance with applicable legislation and international best practices.





In fiscal year 2022, the Risk Management and Compliance Division drafted the necessary policies and regulations to shield the Compliance System.

**In particular, these were developed and approved by EYDAP's Board of Directors:**

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**Policy for the prevention and combating of violence and harassment at work** (approved by the Board of Directors by decree 21025 /8.6.2022) in order to create and establish a work environment free of violence and harassment that respects, promotes and safeguards human dignity and protects the rights of every person from abusive and violent behavior.

EYDAP has adopted this Policy as best practice across its range of activities to prevent and address all forms of violence and harassment including gender-based violence and harassment and sexual harassment that occurs in the course of work whether related to or arising from work.

The Company is committed to operating in accordance with the rules of ethics and the applicable legal and regulatory framework for the protection of labor, seeking to maintain high standards of professional and ethical conduct. The persons covered by the protection are workers and employees, regardless of their contractual status, including those employed under a contract of employment, independent services, paid mandates, those employed through third-party service providers, as well as persons undergoing training, including trainees and apprentices, volunteers, as well as employees whose employment relationship has ended, and persons applying for employment.

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**Code of Ethics and Professional Conduct** EYDAP SA (approved by the Board of Directors with the decree 21079/9.11.2022) in order to regulate the way in which the staff of EYDAP S.A. perform their duties under contract, with the emergence of uniform rules and principles that must govern their professional activity, as well as their behavior in their relations with each other and in their relations with customers, suppliers, shareholders, public bodies and institutions.

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**Human Rights Policy** (approved by the Board of Directors by decree 21080/9.11.2022), to which EYDAP is committed:

- To act with zero tolerance to behavior and situations that violate human rights, avoiding cooperation with persons who have a proven record of involvement in cases of human rights violations.
- To act with full respect for human rights, promoting individual and collective rights, upholding the concepts of "respect" and "protection".
- as human rights are promoted and protected, taking preventive action to avoid acts and/or omissions that may be detrimental to human rights.
- To raise awareness and ensure the commitment of all those employed by the Company, whether or not in the form of dependent employment, partners and suppliers or subsidiaries.

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**Regulatory Compliance Management System**, which was approved by BoD decision 21101/21.12.2022. The System concerns the compliance of the Company's Personnel, Management and Associates with the applicable regulatory and legislative framework, as well as with the Internal Regulations of EYDAP, the Code of Ethics and Professional Conduct of EYDAP S.A., the Policies and Procedures governing the operation of the Company in order to prevent, identify and avoid risks and other legal consequences for the Company.

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**Regulatory Compliance Policy** approved by the Board of Directors' decision 21101/21.12.2022, with the purpose of establishing principles and rules, through the relevant Policies, Regulations and Codes adopted and applied by the Company, in order to achieve the effective management of all types of Regulatory Compliance risks of the Company, as well as the strengthening of the "culture" of compliance within the Company, as a model of corporate behavior.

**During the year 2022, EYDAP introduced important policies with the approval of the Board of Directors that have shielded the already existing regulatory framework. The following are mentioned below:**

- **Policy for Video Surveillance Systems** (CCTV) (approved by the Board of Directors' Decision No. 21065/07.09.2022 / EYDAP S.A.).
- **Revenue & Customer Claims Management Policy of EYDAP S.A.** (approved by Board Decision No 21010/28.04.2022).

It adopts on an annual basis a **Regulatory Compliance Plan** which is prepared by the Regulatory Compliance Department and approved by the Board of Directors. The Regulatory Compliance Plan is aligned with the Company's strategy and annual business objectives. The Annual Regulatory Compliance Plan 2023 of EYDAP S.A. was approved by Board Decision No. 21102/21-12-2022.



## Results of the Policies and Procedures for Regulatory Compliance

Incidents of corruption 2022	
A. Total number and nature of corruption incidents	Involves an employee who attempted to place an illegitimate connection. The penalty imposed on him by the Primary Disciplinary Board is a mandatory two-month suspension from service in accordance with Article 31 of the EYDAP Staff Regulations.
B. Total number of corruption incidents involving disciplinary sanctions against Company employees during the reporting period	1
C. Total number of incidents of corruption related to termination of partner contracts or non-renewal of contracts due to corruption, during the reporting period	0
D. Legal cases relating to corruption issues filed against the Company or its employees during the reporting period	0

Indicative actions taken by the Company to prevent similar situations are the recorded instructions given to employees by the Code of Ethics and Professional Conduct, the Code of Conduct and Conflict of Interest Policy and the Risk Management Policy. Also in accordance with the whistleblowing policy for whistleblowing, in this case the complaint was made to the Police by bystanders.

## Legislative and regulatory compliance

Compliance with the applicable legislation, as well as the implementation of compliance safeguards with the regulatory framework governing the Company's operation, resulted in the absence - for 2022 - of recorded incidents of non-compliance with legislation and related significant social, environmental and economic impacts.

## Corporate governance goals 2023



Adoption of the Risk Management and Regulatory Compliance Directorate's Operating Rules, as well as a Risk Management Policy.



Approval of the Regulation on the Award and Execution of Contracts for Projects, Studies and the Provision of Technical and Other Related Scientific Services.



Rules of Procedure of the Strategy, Innovation and Sustainable Development Committee following the Board decision that included Sustainable Development issues in the responsibilities of the Strategy and Innovation Committee.



Rules of Procedure of the Board Regulatory Compliance Committee.



Regulation for the Functioning of EYDAP's Technical Council (21289/26.4.2023 Board Decision).



Update of the Regulation of the Audit Committee (21549/5.7.2023 Board Decision).



Environmental Policy (21295/26.4.2023 BoD Decision).



Information and Declaration Policy for the Protection of Personal Data of Insured Persons in the Health Care System of EYDAP (BoD Decision 21275/22-3-2023).



Policy for Handling of Complaints regarding issues of the General Data Protection Regulation (Board Decision 21274/22-3-2023).



Update of the Whistleblowing Policy (BoD Decision 21273/22-3-2023).



Update of the Conflict of Interest Policy (BoD Decision 21159/16-2-2023).



Benefits Policy for Regular Staff of EYDAP (Board Decision 21149/11-1-2023).



## 5.3 Protection of Personal Data

EYDAP manages the issue of Personal Data Protection and the **continuous compliance** of the Company in the light of the provisions of the General Data Protection Regulation EU2016/679 and the current legislative framework (n4624/2019, n 347/2006), the Guidelines of the Working Group No. 29 (WP29), of the European Data Protection Board (EDPS), of the European Commission, of the relevant Directives, Decisions, Opinions of the Data Protection Authority. In this context, a **Data Protection Officer's Office** has been established, staffed by individuals with expertise and knowledge of internal Company procedures, in order to ensure continuous and secure compliance.

For EYDAP, ensuring the protection of personal data is inextricably linked to the protection of human rights.

**The scheduled plan of the DPO office for the year 2022 was formulated to enable the Company to continue to respond to the special circumstances created in previous years with the health crisis, in matters related to additional measures to inform staff, customers, strengthening its security.**



With respect to the rights of the natural persons concerned and always aiming at compliance with the GDPR, policies are formulated & such as:



**Employee Personal Data  
Protection Policy**



**Consumer Data  
Protection Policy**



**Fair Use and Personal Data  
Protection Policy**



**Employee Data Protection Policy, Insured Data  
Protection Policy, Video Surveillance Systems**



**Cookies Policy**



**Shareholder Policy**



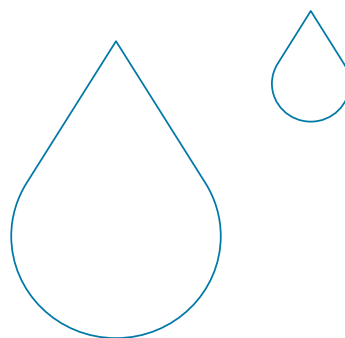
**Privacy Policy in the Award and Performance  
of Public Contracts**



**Personal data may also be managed under other  
policies such as Whistleblowing, Violence and  
Harassment etc.**

**With specific reference to the period of 2022, the Data Protection Officer, as an advisory agent of the Company, in cooperation with the relevant service agents, took care of the following actions:**

1. Continuous updating of the Activity File in coordinated cooperation and communication with the executives of EYDAP. In 2022, 382 activities where personal data is processed were updated and checked.
2. Continuous updating of the Activity File in coordinated cooperation and communication with the EADAP executives. In 2022, 382 activities where personal data is processed were updated and verified.
3. Recommendations for vulnerability corrections.
4. Update-completion of relevant forms, official Company documents, recommendations, annexes, contracts, existing Policies.
5. Providing opinions in relation to current legislative developments and on issues that have arisen.
6. In the context of entering into partnerships with third parties, when they have the role of Executor, an audit of the technical and organizational measures they take to safeguard personal data before signing the respective contract was carried out.
7. Formulation of a Policy for the Management of Complaint Requests regarding issues of the General Data Protection Regulation , formulation of a Breach Policy
8. Creation of an internal Cooperation Guide "Don't Forget GDPR".
9. Creation of a manual of technical and organizational measures
10. Reformulation of consent statements for the processing of personal data and related forms and providing guidance to the relevant organizational units on issues raised in the performance of their responsibilities ( management of a damage event to a customer or a third party, reformatting of the compensation notice form, data management of seminar instructors, issuing of service IDs, informing customers of newly acquired water supply and sewerage networks, informing customers of high consumption, complaints procedure of the Health Care Directorate, posting of benefits on the portal, taking photos of employees, updating of the consent form for e-passport, etc.)
11. Formulate opinions and guidelines on strengthening physical and technical security, restricting access to certain activities and minimizing data in procedures and forms involving personal data of customers.
12. Providing clear instructions and guidance to managers and staff as to the proper management of customer data and the handling of potential breach incidents.
13. Training of human resources on Data Protection issues.  
*(This issue is discussed in the corresponding section in the same report)* ➔
14. Involvement in the design of new activities to ensure compliance with GDPR (By Design).





## Management of customer/employee complaints/claims

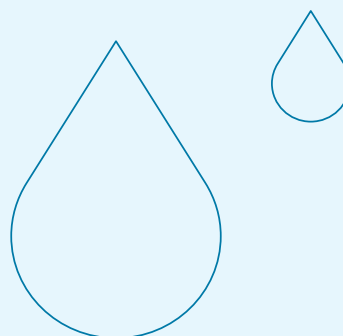
The submission of subjects' requests is done through all communication channels of the Company. The Company's goal is to draft a Complaint Request Policy on data protection regulation issues within the first 3 months of 2023.

EYDAP provides and takes every measure to ensure the protection of Personal Data of its customers (as long as it manages them directly). During the reporting period (2022) only a small number of requests-complaints from EYDAP's customers were noted, which were managed directly and satisfactorily. It is noted that the final outcome of the 2020 incident of a breach of customers' Personal Data by a third-party - External Partner, namely by ELTA, is still pending. The investigation of the incident by Greek Justice is still in progress. We note that immediately our partner took all necessary measures and informed the subjects of the violation. The DPO's office managed the incident with the full cooperation of the parties involved (ELTA, ELTA DPO, CISO, EDDG) and with coordinated action provided all useful information to the HDPa without delay. This incident was a showcase exercise for the effective demonstration of cooperation between the DPO - CISO - Directorate of Cybersecurity.

Determinants of risk mitigation

- the continuous updating of the Company's Activity File
- the immediacy of communication to address relevant issues
- the rapid service of requests from stakeholders and the public
- the regular monitoring, through specific questionnaires, of the data recording and technical security measures that the Company's external partners are required to comply with, with strict liability and accountability control clauses, when they are entrusted with the processing of personal data of individuals who have dealings with the Company

*Reference is made to the protection of employees' personal data in the "Labor Practices" section ➔  
and to the protection of consumers' personal data in the "Secure Customer Service - Affordable Tariff" section of the same Report ➔*







## 5.4 Digital Transformation

### Digital transformation:

- **Is part of the priorities of EYDAP**, as a modern company that follows best practices, with the main focus on the efficiency of our services and the best service to our customers.
- **Reinforces the three key pillars of the company's strategy, which are Growth, Efficiency and Safety.** It is clear that the goal of digital transformation is to offer easy-to-use digital services oriented to the needs of citizens and also to a more sound & secure operation of the company.





## Our impacts

### Maturity in Cyber Security Issues

In the context of digital transformation, the Company has made it a priority to shield itself through an organized cybersecurity framework, taking into account the Community and national legislation and the current National Cybersecurity Strategy.

In 2022, a Self-Assessment of the level of security of the Company's network and information systems in relation to regulatory and statutory cybersecurity obligations was implemented.

- Risk profiling for the upgrading of security measures, as well as study of the implementation of individual security policies and procedures, based on international standards and methodologies.
- Business Continuity Plan & recovery plan for the Company's information systems from a potential disaster (Business Continuity Plan / Disaster Recovery Plan).
- Collaboration framework (Data Protection Officer and Information Security Officer) on the one hand for the productive exploitation of identified vulnerabilities on the recorded activities where personal data processing is identified, and on the other hand for the targeted creation of clear procedures and policy in case a breach incident is identified.
- A cybersecurity training program for all staff.
- Strengthening the resilience of digital infrastructures and applications against external threats.

In addition, the procurement of tools for the creation of a Digital Asset Registry for the more complete organization and holistic management of hardware and software (digital asset registry) was launched.

### Upgrading of centralised information systems

In 2022, for the safer operation of the information systems, an upgrade of operational software and infrastructure of central systems was carried out

- geographic imaging Smallworld - GIS
- the information system of the corporate website [www.eydap.gr](http://www.eydap.gr)
- the Billing Customer Care (BCC) system
- addition of new functions to the corporate communication systems (voice portal, RAINBOW platform, etc.)

**The aim is to complete, at the beginning of 2023, the upgrade of the CITRIX systems, the Health Services application and the Mail Transit application (Papyrus), as well as the activation of the new Ticketing system for monitoring internal requests (IT helpdesk, fire safety and building maintenance).**

### Upgrade of the Operational Resource Management (ERP) System

The Company, by adopting best practices in line with operational needs, is redesigning its operating model and processes aiming at more effective and efficient operations, increasing productivity, saving operating costs and improving information while ensuring an effective control environment, gaining:

- Data security and classified access to information.
- Improved resource management (e.g. inventory, vehicle fleet, etc.).
- Improved information - Timely receipt of reliable data at a common point (single source of truth).
- Access to relevant information, anytime and anywhere

#### In 2022

- **planning for the supply and installation of the new ERP system is completed**
- **consultation with the market was carried out by collecting proposals/ solutions according to the company's modern requirements**
- **the tender for the new ERP was approved**



## Digitization - Automation of Processes With a Positive Impact on Reducing Operational Costs, Time to Complete Work and Enhancing Transparency

Digital Transformation is the framework for the changes that a company adopts in order to exploit the advantages offered by the Internet, digital media and new technologies.

For example:

- **626** new computers and **657** monitors are made available.
- **49** new laptops and **17** new tablets.
- **169** new printers, **45** new all-in-one machines and **136** new scanners.
- Intensify the process of issuing and using digital signatures, resulting in an increase in the number of digitally signed staff to **550** users by the end of 2022.
- **Electronic circulation of documents through the "Papyrus" application.** In this way, a key business process of the Company becomes fully digital (paperless), significantly reducing the time needed to process cases. (In 2022, approximately **80,000 documents** were moved electronically through the "Papyrus" application and **252 recommendations** through the Electronic Recommendation Handling Application).
- **Launch of new applications for the monitoring of supply chain activities** (TOOLBOX application) where the target is full implementation by the 1st half of 2023 and the vehicle monitoring application (Fleet Management) for which full implementation is expected by the 2nd half of 2023.

**The new conditions have led a significant part of the staff to adopt a new professional culture using new working practices with environmental, economic and governance implications.**

## Data Governance

Data Governance is a tool to ensure effective corporate management, contributing to the reduction of risks and costs.

**EYDAP is establishing a comprehensive data governance system that will include procedures, policies and standards for the management and control of the data that constitute its assets. The Data Governance System shall ensure the accuracy, completeness, consistency and security of data with a positive impact on decision-making.**

In order to better analyse the existing data, in 2022 the radical upgrade of the Company's SCADA systems was initiated and studies were carried out to create a central data warehouse (Data lake).

## Completion of an Innovation Contest

The Digital Innovation Contest, an original, open technological innovation competition, in cooperation with the Innovation Network of HCAP and MIT Enterprise Forum Greece, was completed, with the participation of start-up companies, teams of scientists, university research centers, etc. for the provision of innovative solutions using artificial intelligence models for the detection of faulty water consumption meters and the prediction of future consumption of a supply in the medium term.

**162** applications were submitted and **76** teams were selected. After evaluation, **4** teams were selected, **2** for each challenge. The four winning teams were awarded in February 2022. In particular, in the area of defective meter detection, an additional project on defective meter detection using "big data" and artificial intelligence technologies was launched to one of the winners in this area, which will be completed in 2022.



## EYDAP Data Workshop

As a follow-up to the Innovation Contest, EYDAP organised an internal workshop under the title "EYDAP Data Workshop", in order to consolidate the cooperation between young scientists and corporate executives.

## Innovative Open Data Platform Hub

EYDAP, as a member of the subsidiaries of HCAP, actively contributes to the collaborative development of the innovative open data platform O2 Hub. The pioneering Open Data & Open API Hub, contributes decisively to digital transformation, enhancing transparency and innovation and is an important tool for universities, research institutions, startups, public and private organizations, enabling them to extract data that will help them discover and develop new services and solutions for the benefit of society as a whole. EYDAP continues to actively participate in the operation of the O2 Hub, making 6 datasets publicly available.

## Open Data Hackathon

The Open Data Hackathon is an action that is part of the initiatives of the HCAP, for the promotion and exploitation of open data (Open Data Hub and other open data resources). In this innovation marathon, InnovAthens, more than 150 competitors (startups, developers, researchers, student groups from universities in the country, professionals and business executives) participated in 32 teams.

EYDAP actively participated, providing the contestants with useful information on the challenges they were asked to address, based on both the needs and the way EYDAP operates.

## Digital services through corporate website

In 2022, digital services to the Company's external customers were significantly enhanced.

*Reference is made in the section "Secure Customer Service - Affordable Tariff" of the same Report. ➔*





## 6.

# NOTIFICATIONS RELATED TO ARTICLE 8 OF THE TAXONOMY REGULATION (EU TAXONOMY)



The EU Taxonomy Regulation (2020/852/EU) is one of the tools established based on the European Green Deal, which targets the transformation of the European Union, in a fair manner, into a modern, efficient, competitive and climate-neutral economy by 2050.

The Regulation sets out the technical criteria on which an eligible economic activity can qualify as environmentally sustainable (aligned). It therefore creates a common framework that investors can use when seeking to invest in economic activities that have a significantly positive impact on the climate, as well as the environment and society.

An economic activity is characterized as eligible for the Taxonomy if it is described in one of the Delegated Acts 2021/2139 and 2022/1214, regardless of whether that economic activity meets all the technical screening criteria set out in those Delegated Acts.

An eligible economic activity is considered to be environmentally sustainable, or otherwise aligned with the Regulation, when it meets all of the following conditions:

- It contributes substantially to one or more of the six (6) environmental objectives of the Regulation
- It does not cause significant harm to the other five (5) environmental objectives
- It complies with the minimum social safeguards
- It meets the technical criteria for monitoring established by the Commission

The environmental objectives of the EU Taxonomy Regulation are the following:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection of water and marine resources
- Transition to a circular economy
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

At present, under the Delegated Acts 2021/2139 and 2022/1214, technical screening criteria have been established for only two (2) of the six (6) environmental objectives, namely:

- Climate change mitigation and
- Climate change adaptation.

## Disclosure requirements of the EU Taxonomy Regulation

According to Article 8, paragraph 1, of the EU Taxonomy Regulation (2020/852/EU), determines that any undertaking that is subject to an obligation to publish non-financial information (according to article 19a and 29a of Directive 2013/34/EU), shall include in its non-financial statement or consolidated non-financial statement information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable.

Specifically, regarding disclosures to be published during 2023, concerning the fiscal year 2022, the non-financial undertakings should disclose the following key performance indicators (KPI's):

- the proportion of their turnover («Turnover») derived from products or services associated with economic activities that qualify as environmentally sustainable
- the proportion of their capital expenditure («CapEx») related to assets or processes associated with economic activities that qualify as environmentally sustainable.
- the proportion of their operating expenditure («OpEx») related to assets or processes associated with economic activities that qualify as environmentally sustainable.

## EU taxonomy Report

The following methodology was used to determine EYDAP key performance indicators (KPIs):

1. Identification of eligible economic activities
2. Assessment of alignment of eligible economic activities, based on the following:
  - 2.1 Significant contribution to climate change mitigation and adaptation objectives
  - 2.2 Do no significant harm (DNSH)
3. Compliance with minimum social safeguards
4. Calculation of key performance indicators (Turnover, CaPex & OpEx)



The methodology applied was based on Regulation 2020/852, its Delegated Acts and additional guidance published, as follows:

- Delegated Acts 2021/2139 and 2022/1214
- Delegated Act 2021/2178
- Final Report on Minimum Safeguards.

## 1. Identification of eligible economic activities

EYDAP is the largest company in Greece in the water supply, sewerage, and wastewater treatment sector, covering the needs of more than 40% of the total population of the country, supplying Attica with drinking water.

The economic activities of EYDAP for the financial year 2022 identified as eligible are the following:

- **4.1 Electricity generation using solar photovoltaic technology**
- **4.5 Electricity generation from hydropower**
- **5.1 Construction, extension and operation of water collection, treatment and supply systems**
- **5.3 Construction, extension and operation of wastewater collection and treatment**

In addition to the above activities, part of EYDAP's energy needs in the Wastewater Treatment Plants (WWTP-Psytalleia and WWTP-Metamorfofi) is covered by the energy recovery of biogas produced from the anaerobic digestion of sewage sludge. As this activity is considered a part of the operation of those two WWTPs, as well as not generating revenue, it is not reflected above as a separate economic activity.

The capital expenditure as well as the operating costs of this activity are included in the corresponding indicators of economic activity 5.3 Construction, extension and operation of wastewater collection and treatment.

## 2. Alignment assessment based on technical control criteria

EYDAP S.A. carried out the assessment of its eligible economic activities, active or under development assets, in relation to:

1. Technical screening criteria relating to significant contribution to at least one (1) environmental objective, climate mitigation or adaptation, in order to identify which of these two objectives they contribute significantly to. An identification of economic activities was also carried out as to whether they are classified as enabling or transitional.

As EYDAP economic activities are not classified as enabling, the assessment was made according to the criteria of significant contribution to climate change mitigation, since in non-enabling activities, in the assessment according to the technical criteria of climate change adaptation, the Regulation excludes Turnover and part of CapEx and OpEx from the calculation of key performance indicators.

2. The technical screening criteria related to DNSH to the remaining five (5) objectives. The assessment is carried out according to the criteria related to the environmental objective of climate change adaptation, as well as for the remaining four (4) environmental objectives (Sustainable use and protection of water and marine resources, Transition to a circular economy, Pollution prevention and control and Protection and restoration of biodiversity and ecosystems), where available.

The objective of the assessment was the identification of the extent of alignment of EYDAP S.A eligible economic activities with the criteria and requirements of the EU Taxonomy regulation and also the identification of potential deviations, in order for the company to develop a specific plan of actions towards the achievement of the alignment of the eligible economic activities with the regulation in the years to follow.



In more detail:

## 2.1 Significant contribution

An assessment of the active and under development assets of each eligible economic activity was carried out against the technical screening criteria for significant contribution to climate change mitigation.

### 4.1 Electricity generation using solar photovoltaic technology

EYDAP S.A. has installed and generates electricity from Solar photovoltaic plant located at Acharnai Water Treatment Plant (WTP) of 1,9712 MW total power.

### 4.5 Electricity generation from hydropower

Along the external aqueducts that transport water from the reservoirs to the refineries, Small Hydroelectric Plants operate, whose energy is sold by EYDAP. The water from the aqueducts is diverted to a side canal, where a hydroelectric turbine converts the hydraulic energy into mechanical energy and then, via a generator, into electrical energy. The water is then reintroduced into the main aqueduct, where it continues to flow.

Specifically, the operating small hydroelectric plants are as follows:

1. Elikonas small hydroelectric plant, with a capacity of 650 kW and a projected annual energy production of 5,000,000 kWh.
2. Evinos small hydroelectric plant with a capacity of 820 kW and a projected annual energy production of 4,000,000 kWh.
3. Kithaironas small hydroelectric plant with a capacity of 1200 kW and a projected annual energy production of 5,730,000 kWh.
4. Kirfi small hydroelectric plant with a capacity of 760 kW and a projected annual energy production of 5,860,000 kWh.
5. Mandras small hydroelectric plant with a capacity of 630 kW and a projected annual energy production of 4,900,000 kWh.

The total energy production from the above small hydroelectric plants in 2022 amounted to 18,972,099 KWh.

Finally, it is worth mentioning that in Psyttalia there is a small hydroelectric plant installed in the outfall pipeline, operating since 2015, whose electricity production reaches 2,180,239 kWh in 2022, which is self-consumed. This plant does not generate any revenue for the company.

## 5.1 Construction, extension and operation of water collection, treatment and supply systems

EYDAP has installed and operates four (4) Water Treatment Plants with a total refining capacity of 1,900,000 m<sup>3</sup>/day, namely in the areas of Galatsi (550,000 m<sup>3</sup>/day), Acharnon (850,000 m<sup>3</sup>/day), Polydendri (300,000 m<sup>3</sup>/day) and Aspropyrgos (200,000 m<sup>3</sup>/day) and operates ten (10) Refineries, which are the following:

- Thiva potable water refinery with a total refining capacity of 360 m<sup>3</sup>/hr supplying the areas of Erythres-Plataeas-Oinoi-Villia-Profitis Ilias
- Kaprelia potable water refinery with a total refining capacity of 100 m<sup>3</sup>/hr supplying the areas of Kaparelli-Melisochoi-Loutoufi-Agios Vasilios
- Lefktron potable water refinery with a total refining capacity of 70 m<sup>3</sup>/hr supplying the area of Lefktron
- Ellopia potable water refinery with a total refining capacity of 35 m<sup>3</sup>/hr supplying the areas of Ellopia – Xeronomi
- Dombrena potable water refinery with a total refining capacity of 35 m<sup>3</sup>/hr supplying the areas of Dombrena – Thisvi
- Prodromou potable water refinery with a total refining capacity of 45 m<sup>3</sup>/hr supplying the areas of Saranti – Prodromou
- Panagia Kalamiotissa potable water refinery with a total refining capacity of 22 m<sup>3</sup>/hr supplying the area of Karachaliou
- Tarsos - Karyotis potable water refinery with a total refining capacity of 4 m<sup>3</sup>/hr supplying the areas of Tarsos – Karyotis
- Kyriaki potable water refinery with a total refining capacity of 35 m<sup>3</sup>/hr supplying the area of Kyriaki
- Distomo potable water refinery with a total refining capacity of 70 m<sup>3</sup>/hr supplying the area of Distomo

## 5.3 Construction, extension and operation of wastewater collection and treatment

The wastewater treatment from the areas under the jurisdiction of EYDAP, which currently have a sewerage network, is carried out at the three Wastewater Treatment Plants on the island of Psyttalleia (WWTP-P) with a total capacity of 1,000,000 m<sup>3</sup>/day and an average daily incoming wastewater flow of 694.575 m<sup>3</sup>/day, in Metamorfoi (WWTP-M) with a total capacity of 44.000 m<sup>3</sup>/day and an average daily incoming wastewater flow of 24.000 m<sup>3</sup>/day and in Thrasio (WWTP-T) with a total capacity of 21.000 m<sup>3</sup>/day and an average daily incoming wastewater flow of 6.330 m<sup>3</sup>/day. At the same time,





EYDAP has included the implementation of sewerage projects in Eastern Attica in its operational objectives, with a view to finding a definitive solution to the problem of urban wastewater disposal in the region, ensuring environmental protection, sustainable development and the protection of public health. Thus, two Wastewater Treatment Plants are under construction, namely:

1. The WWTP of the Municipalities of Rafina - Pikermio & Artemis - Spata with a treatment capacity of 23.646 m<sup>3</sup>/d
2. The WWTP of the Municipality of Marathon with a treatment capacity of 9.885 m<sup>3</sup>/d

## 2.2 Do No Significant Harm (DNSH)

An assessment of the active or under development assets of each eligible economic activity was carried out according to the DNSH criteria in relation to the environmental objective of adaptation to climate change and the other four (4) environmental objectives (Sustainable use and protection of water and marine resources, Transition to a circular economy, Pollution prevention & control and Protection and restoration of biodiversity and ecosystems), where available.

## 2.3 Minimum Social Safeguards

EYDAP S.A. was assessed against the requirements of the minimum social safeguards as set out in Article 18 of the EU Taxonomy Regulation (2020/852/EU). The minimum social safeguards are a set of defined UN, EU and other international human rights and code of ethics guidelines, as follows:

1. The OECD Guidelines for Multinational Enterprises
2. The UN Guiding Principles on Business and Human Rights-UNGP
3. The principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work
4. The International Bill of Human Rights

According to the Final Report on Minimum Safeguards of the Platform on Sustainable Finance, the minimum social safeguards cover the following areas:

- Human rights, including labor rights
- Corruption/Bribery
- Taxation
- Fair Competition

All human rights included in the *ILO Fundamental Conventions* and the International Bill of Human Rights are taken into account in the UN Guiding Principles on Business and Human Rights. Therefore, the assessment on minimum social safeguards was mainly based on the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

## Human Rights

EYDAP has zero tolerance against behaviors and situations that violate human rights and avoids doing business with persons who have a proven track record of human rights violations. In this direction, EYDAP, since 2022, has been implementing a Human Rights Policy, approved by the Board of Directors, which has as its primary objective to raise awareness and ensure the commitment of all those employed by the Company, whether in the form of dependent employment or not, partners, suppliers or subsidiaries to the Company. The Policy applies to EYDAP S.A. as well as to any existing or future subsidiary of the Company.

EYDAP fully complies with the requirements of Greek and EU legislation and human rights standards. In particular, the 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 Labour Organization
- International Standard on Social Accountability 8000 (SA 8000)



The main pillars of the Policy are labour rights and social human rights. The Company takes care to identify and prevent situations that jeopardize human rights by informing and training all its staff and other associates appropriately, in application of the Policy. The Risk Management and Compliance Division is responsible for the compliance and effective implementation of the Policy, while the General Division of Human Resources is responsible for its communication to employees.

## Corruption & Bribery

Integrity is a fundamental principle for EYDAP. To this end, EYDAP has developed the *Code of Ethics & Professional Conduct* which defines acceptable behaviours of personal and professional integrity. This Code sets out the Company's acceptable framework for offering and accepting gifts and other benefits from employees to third parties and vice versa.

In particular, EYDAP has adopted the *Anti-Corruption and Anti-Bribery Policy* in line with the European Policy and the Greek Anti-Corruption Action Plan and through this Policy, EYDAP is committed to conducting its activities with transparency, ethics, integrity and respect for society and the environment. Covered persons are the members of the Board of Directors, senior and top management and all employees of the Company regardless of the type of employment relationship. Relevant trainings are organized for employees (e.g. completion, execution and implementation of Public Contracts) in order to inform and raise awareness of bribery and corruption issues.

In addition, EYDAP has established and implements a *Sponsorship Policy*, which identifies the basic principles of its sponsorship activity as derived from its strategy and priorities, the characteristics that should govern the sponsored actions and the beneficiaries, as well as the process to be followed up to the final stage of their implementation.

EYDAP has a *Whistleblowing Policy*, under which its employees and/or third parties are encouraged to report malfunctions, irregularities, omissions or criminal acts that have come to their attention, as well as to express any concerns or complaints regarding issues of possible violations of the Company's policies or of the legislative-regulatory framework governing its operation.

## Taxation

With respect to tax issues, EYDAP ensures compliance with accounting and tax laws, legislation and other regulatory requirements for itself and all its subsidiaries. Compliance with tax legislation is also ensured through the issuance of a "Tax Compliance Certificate" as well as a "Tax Audit Certificate".

The Company's Management and Finance Department is responsible for ensuring compliance with the tax legislation.

Additionally, the Company's Management makes provisions in the financial statements for tax risks as reflected in the financial report. The Risk Management Division monitors and implements similar practices for all of the Company's risks which is reporting to the Risk Management Committee of the EYDAP Board of Directors.

## Fair Competition

EYDAP gives particular importance to compliance with Competition Law. Compliance with applicable national and European law is a key requirement. The highest obligation of everyone at EYDAP in the performance of duties under the Code of Ethics & Professional Conduct is to respect the Constitution, laws and institutions and to refrain from any illegal act at work.

More specifically, EYDAP, in tendering procedures of high importance and with a high economic scope, conducts tenders published at European level, in order to ensure the participation of important suppliers active in both the domestic and the European business scene, thus ensuring the development of healthy competition, which leads to the achievement of significant economic benefits for the Company.



## Accounting policy for the determination of key performance indicators (KPIs)

### 3.1 Turnover

The proportion of turnover referred to in Article 8(2), point (a), of the Regulation (EU) 2020/852 is calculated as the part of the net turnover derived from products or services, associated with Taxonomy-aligned economic activities (numerator), divided by the net turnover (denominator) as defined in Article 2, point (5), of Directive 2013/34/EU. The turnover covers the revenue recognized pursuant to International Accounting Standard (IAS) 1, paragraph 82(a), as adopted by Commission Regulation (EC) No 1126/2008<sup>1</sup>.

To avoid double counting, the figures have eliminated intergroup transactions.

### 3.2 Capital Expenditure (CapEx)

The proportion of CapEx referred to in Article 8(2), point (b), of Regulation (EU) 2020/852 shall be calculated as the numerator divided by the denominator as specified in points 1.1.2.1 and 1.1.2.2 of Annex I of the Delegated Regulation (EU) 2021/2178.

#### Denominator

The denominator covers additions to tangible and intangible assets during the financial year considered before depreciation, amortization and any re-measurements, including those resulting from revaluations and impairments, for the relevant financial year and excluding fair value changes. The denominator also covers additions to tangible and intangible assets resulting from business combinations.

For non-financial undertakings applying international financial reporting standards (IFRS) as adopted by Regulation (EC) No 1126/2008, CapEx shall cover costs that are accounted based on:

- (a) IAS 16 Property, Plant and Equipment, paragraphs 73, (e), point (i) and point (iii);
- (b) IAS 38 Intangible Assets, paragraph 118, (e), point (i);
- (f) IFRS 16 Leases, paragraph 53, point (h).

Leases that do not lead to the recognition of a right-of-use over the asset shall not be counted as CapEx.

#### Numerator

The numerator equals to the part of the capital expenditure included in the denominator that is any of the following:

- a) related to assets or processes that are associated with Taxonomy-aligned economic activities;
- b) part of a plan to expand Taxonomy-aligned economic activities or to allow Taxonomy-eligible economic activities to become Taxonomy-aligned ('CapEx plan') under the conditions specified in the second subparagraph of point 1.1.2.2 of Annex I of the delegated Regulation 2021/2178 EU;

The CapEx plan referred to in the first paragraph of this point 1.1.2.2 shall meet the following conditions:

- a) the plan aims either to expand the undertaking's Taxonomy-aligned economic activities or to upgrade Taxonomy eligible economic activities to render them Taxonomy-aligned within a period of five years.
- b) the plan shall be disclosed at economic activity aggregated level and be approved by the management body of non-financial undertakings either directly or by delegation.

Where the relevant technical screening criteria are amended before the completion of the CapEx plan, non-financial undertakings shall either update the plan within two years to ensure the economic activities referred to in point (a) are aligned with the amended technical screening criteria upon the completion of the plan or restate the numerator of the CapEx KPI.

The updating of plan shall restart the period referred to in point (a). The period referred to point (a) of the second paragraph of this point 1.1.2.2 can exceed five years only where a longer period is objectively justified by specific features of the economic activity and the upgrade concerned, with a maximum of 10 years.

That justification shall feature in the CapEx plan itself and in the contextual information detailed under point 1.2.3 of this Annex.

Where the CapEx plan fails to meet the conditions referred to in the second paragraph of this point 1.1.2.2, previously published KPI related to capital expenditure shall be restated.

<sup>1</sup> Commission Regulation (EC) No 1126/2008 of 3 November 2008 adopting certain international accounting standards in accordance with Regulation (EC) No 1606/2002 of the European Parliament and of the Council (OJ L 320, 29.11.2008, p. 1)

To avoid double counting in the allocation in the numerator of CapEx across economic activities, the figures have eliminated intergroup transactions.

### 3.3 Operating expenditure (OpEx)

The proportion of OpEx referred to in Article 8(2), point (b), of Regulation (EU) 2020/852 is calculated as the numerator divided by the denominator as specified in points 1.1.3.1 and 1.1.3.2 of the Annex I of the delegated Regulation 2021/2178 EU.

#### Denominator

The denominator shall cover direct non-capitalised costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets.

#### Numerator

The numerator equals to the part of the capital expenditure included in the denominator that is any of the following:

- a) related to assets or processes associated with Taxonomy-aligned economic activities, including training and other human resources adaptation needs, and direct non-capitalized costs that represent research and development.
- b) part of the CapEx plan to expand Taxonomy-aligned economic activities or allow Taxonomy-eligible economic activities to become Taxonomy-aligned within a predefined timeframe as set out in the second paragraph of point 1.1.3.2 of the Annex I of the delegated Regulation 2021/2178 EU.

The CapEx plan, referred to in the first paragraph of point 1.1.3.2 of Annex I of the delegated Regulation 2021/2178 EU, shall meet the conditions specified in point 1.1.2.2 of the Annex I of the delegated Regulation 2021/2178 EU.

Research and development costs already accounted for in the CapEx KPI is not counted as OpEx.

To avoid double counting in the allocation in the numerator of OpEx across economic activities, the figures have eliminated intergroup transactions.







### 3.4 Key Performance Indicators 2022

In the following tables the percentages of turnover, CapEx and OpEx of Taxonomy aligned, Taxonomy-non-aligned and Taxonomy-non eligible economic activities for the financial year 2022, are presented, according to the results of the alignment assessment of the economic activities of EYDAP S.A.

Turnover				Substantial contribution criteria						DNSH criteria ('Does No Significant Harm')										
Economic activities	Code	Turnover	Proportion of total Turnover	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy-aligned proportion of Turnover FY22	Taxonomy-aligned proportion of Turnover FY21	Category (Enabling activity)	Category (Transitional activity)
		'000€	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E
A. Taxonomy-Eligible Activities																				
A.1 Taxonomy-aligned activities																				
Total Turnover from taxonomy-eligible and aligned activities (A.1)		0	0%	0%	0%	-	-	-	-								0%	*	0%	0%
A.2 Taxonomy-non-aligned activities																				
Electricity generation using solar photovoltaic technology		4.1																		
Electricity generation from hydropower		4.5																		
Construction, extension and operation of water collection, treatment and supply systems		5.1																		
Construction, extension and operation of wastewater collection and treatment		5.3																		
Total Turnover from taxonomy-non-aligned activities (A.2)																				
Total Taxonomy-eligible Turnover (A.1 + A.2)																	0%	*	0%	0%
B. Taxonomy-Non-Eligible Activities																				
Total Turnover from Taxonomy-non-eligible activities (B)																				
Total Turnover (A+B)																				

\* There was no obligation to be calculated for 2021



CapEx				Substantial contribution criteria						DNSH criteria ('Does No Significant Harm')										
Economic activities	Code	CapEx	Proportion of total CapEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy-aligned proportion of CapEx FY22	Taxonomy-aligned proportion of CapEx FY21	Category (Enabling activity)	Category (Transitional activity)
		'000€	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E	T
A. Taxonomy-Eligible Activities																				
A.1 Taxonomy-aligned activities																				
Total CapEx from taxonomy-eligible and aligned activities (A.1)		0	0%	0%	0%	-	-	-	-								0%	*	0%	0%
A.2 Taxonomy-non-aligned activities																				
Electricity generation using solar photovoltaic technology		4.1																		
Electricity generation from hydropower		4.5																		
Construction, extension and operation of water collection, treatment and supply systems		5.1																		
Construction, extension and operation of wastewater collection and treatment		5.3																		
Total CapEx from taxonomy-non-aligned activities (A.2)																				
Total Taxonomy-eligible CapEx (A.1 + A.2)																	0%	*	0%	0%
B. Taxonomy-Non-Eligible Activities																				
Total CapEx from Taxonomy-non-eligible activities (B)																				
Total CapEx (A+B)																				

\* There was no obligation to be calculated for 2021



OpEx				Substantial contribution criteria						DNSH criteria ('Does No Significant Harm')											
Economic activities	Code	OpEx	Proportion of total OpEx	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	Taxonomy-aligned proportion of OpEx FY22	Taxonomy-aligned proportion of OpEx FY21	Category (Enabling activity)	Category (Transitional activity)	
		'000€	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	%	E	T
A. Taxonomy-Eligible Activities																					
A.1 Taxonomy-aligned activities																					
Total OpEx from taxonomy-eligible and aligned activities (A.1)		0	0%	0%	0%	-	-	-	-								0%	*	0%	0%	0%
A.2 Taxonomy-non-aligned activities																					
Electricity generation using solar photovoltaic technology		4.1																			
Electricity generation from hydropower		4.5																			
Construction, extension and operation of water collection, treatment and supply systems		5.1																			
Construction, extension and operation of wastewater collection and treatment		5.3																			
Total OpEx from taxonomy-non-aligned activities (A.2)																					
Total Taxonomy-eligible OpEx (A.1 + A.2)																	0%	*	0%	0%	
B. Taxonomy-Non-Eligible Activities																					
Total OpEx from Taxonomy-non-eligible activities (B)																					
Total OpEx (A+B)																					

\* There was no obligation to be calculated for 2021



# Table of contents GRI

GRI 1: Organisation	
Statement of use	The information provided in this report reflect the activities of EYDAP for the period 1/1/2022 – 31/12/2022 presenting the financial, environmental and social performances. The report has been prepared in accordance with the Global Sustainability Reporting Initiative GRI Universal Standards 2021.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	Relevant GRI Sector Standard not available.

## GRI 2: General Disclosures 2021

GRI Standards	Disclosure	Page number/reference	Omission
<b>1. The organisation and its reporting practices</b>			
2-1	Organisational Details	P. 27-30	
2-2	Entities included in the organisation's sustainability reporting	P. 27-30	
2-3	Reporting period, frequency and contact point	P. 7	
2-4	Restatements of information	P. 7 In the parts of the Report where revisions have been made, there is a relevant reference.	
2-5	External assurance	P. 7, 279	
<b>2. Activities and workers</b>			
2-6	Activities, value chain and other business relationships	P. 25, 27,29, 30-33, 204-207	
2-7	Employees	P. 190- 192	
2-8	Workers who are not employees	P. 191 Currently, the number of indirect employees refers to all those engaged in and providing administrative services .	





### 3. Governance

2-9	Governance structure and composition	P. 34-39, 220-226	
2-10	Nomination and selection of the highest governance body	P. 223	
2-11	Chair of the highest governance body	P. 13,38, 222-225	
2-12	Role of the highest governance body in overseeing the management of impacts	P. 34-35, 37-38, 220-222, 226	
2-13	Delegation of responsibility for managing impacts	P. 38-39, 221	
2-14	Role of the highest governance body in sustainability reporting	P. 34-35, 53, 222, 227	
2-15	Conflicts of interest	P. 223, 229-230 A Conflict of Interests Policy is applied which is incorporated into the Company's Internal Regulations.	
2-16	Communication of critical concerns	P. 35, 174, 227 Communication is done through the company's Sustainable Development Committee.	
2-17	Collective knowledge of the highest governance body	P. 202, 223 The Board receives knowledge and information about sustainable development issues, through the Sustainable Development Committee and specialised training.	
2-18	Evaluation of the performance of the highest governance body	P. 224-225	
2-19	Remuneration policies	P. 224	
2-20	Process to determine remuneration	P. 224-225	
2-21	Annual total compensation ratio	P. 192	

### 4. Strategy, policies and practices

2-22	Statement on sustainable development strategy	P. 6	
2-23	Policy commitments	P. 34, 37, 179 - 182, 205, 225, 229-233	
2-24	Embedding policy commitments	P. 182, 199, 200, 202, 207, 225, 229-233, 235-238	
2-25	Processes to remediate negative impacts	P. 53, 174- 175, 182, 227, 231, 233, 234	
2-26	Mechanisms for seeking advice and raising concerns	P. 50-54, 181-182, 194, 196, 199, 207, 230, 231, 248	
2-27	Compliance with laws and regulations	P. 47,56, 68, 70, 99, 135, 155, 185, 194, 196, 207, 233	
2-28	Membership associations	P. 40	

### 5. Stakeholder engagement

2-29	Approach to stakeholder engagement	P. 50-52	
2-30	Collective bargaining agreements	P. 182	



### GRI 3: Material Topics 2021

	GRI Standards	Disclosure	Location	Omission
	GRI 3: Material Topics	3-1 Process to determine material topics	P. 50-54	
		3-2 List of material topics	P. 54	
1. Sustainable Management of Natural Resources/Water Supply Resources	GRI 3: Material Topics	3-3 Management of material topics	P. 58-66	
	GRI 303: Water and Effluents	303-1 Interactions with water as a shared resource	P. 58-68, 93, 105, 107-121, 143-152, 156-163, 208, 211-213	
		303-2 Management of water discharge-related impacts	P. 67-68, 139-163	
		303-3 Water withdrawal	P. 107, 114	
		303-4 Water discharge	P. 67-68 139-163	
		303-5 Water consumption	P. 112, 114, 117-118	





2. Health & Safety of Consumers and Workers	GRI 3: Material Topics	3-3 Management of material topics	P. 164 - 167	
	GRI 403: Occupational Health and Safety	403-1 Occupational health and safety management system	P. 165 – 166, 168	
		403-2 Hazard identification, risk assessment, and incident investigation	P. 165 - 167	
		403-3 Occupational health services	P. 167-168, 194, 196	
		403-4 Worker participation, consultation, and communication on occupational health and safety	P. 165-167	
		403-5 Worker training on occupational health and safety	P. 167, 199	
		403-6 Promotion of worker health	P. 37, 153, 168, 182, 184, 196	
		403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	P. 166-167, 205	
		403-8 Workers covered by an occupational health and safety management system	P. 168, 182 100% of employees with an employment contract with EYDAP are covered by the company's H&S systems.	
		403-9 Work-related injuries	P. 168	
		403-10 Work-related ill health	P. 168	
	416 Customer Health and Safety	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	Σελ 135, 155	
3. Protection of Ecosystem	GRI 3: Material Topics	3-3 Management of material topics	P. 67-70	
	GRI 304: Biodiversity	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	P. 69-70	
		304-2 Significant impacts of activities, products and services on biodiversity	P. 67-70	
		304-3 Habitats protected or restored	P. 70	



4. Climate Change Adaptation	GRI 3: Material Topics	3-3 Management of material topics	P. 71-89	
	GRI 302: Energy	302-1 Energy consumption within the organization	P. 79-85	
		302-2 Energy consumption outside of the organization	P. 83-85	
		302-3 Energy intensity	P. 85	
	GRI 305: Emissions	305-1 Direct (Scope 1) GHG emissions	P. 72-77	
		305-2 Energy indirect (Scope 2) GHG emissions	P. 72-77	
		305-3 Other indirect (Scope 3) GHG emissions	P. 72-77	
		305-4 GHG emissions intensity	P. 77	
		305-5 Reduction of GHG emissions	P. 86-89	
		305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	P. 73	
5. Fight Against Corruption	GRI 3: Material Topics	3-3 Διοικητική πρακτική για το ουσιαστικό θέμα	P. 146-151	
	GRI 205: Anti-corruption	205-2 Communication and training about anti-corruption policies and procedures	P. 199, 207, 225	
		205-3 Confirmed incidents of corruption and actions taken	P. 233	
6. Employee Training and Development	GRI 3: Material Topics	3-3 Management of material topics	P. 198-203	
	GRI 404: Training and Education	404-1 Average hours of training per year per employee	P. 201	
		404-2 Programs for upgrading employee skills and transition assistance programs	P. 199, 200-202	





7. Labor Practices	GRI 3: Material Topics	3-3 Management of material topics	P. 187-196	
	GRI 401: Employment	401-1: New employee hires and employee turnover	P. 192	
	EYDAP INDEX	CORPORATE CULTURE	P. 188	
8. Local Community	GRI 3: Material Topics	3-3 Management of material topics	P. 208-213	
	GRI 413: Local Communities	413-1 Operations with local community engagement, impact assessments, and development programs	P. 208-217	
9. Financial Performance	GRI 3: Material Topics	3-3 Management of material topics	P. 41-47	
	GRI 201: Economic Performance	201-1 Direct economic value generated and distributed	P. 42	
		201-2 Financial implications and other risks and opportunities due to climate change	P. 46	
		201-3 Defined benefit plan obligations and other retirement plans	P. 47	
		201-4 Financial assistance received from government	P. 47	
	GRI 207: Tax	207-1 Tax governance, control, and risk management	P. 46	
		207-2 Tax governance, control, and risk management	P. 46	
	GRI 415: Public Policy	415-1 Political contributions	P. 47 The Company does not make any donations, monetary or non-monetary, to political persons, political parties	
	EYDAP INDEX	MAIN FINANCIAL RESULTS	P. 41-42	



10. Diversity & Equal Opportunities	GRI 3: Material Topics	3-3 Management of material topics	P. 180-186	
	GRI 401: Employment	401-3 Total number of parental leave by gender and percentage of returning/remaining to work	P. 184	
	GRI 405: Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	P. 185	
		405-2 Ratio of basic salary and remuneration of women to men	P. 183	
	GRI 406: Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	P. 183, 185	
	GRI 408: Child Labor	408-1 Operations and suppliers at significant risk for incidents of child labor	P. 181-182, 205,207	
	GRI 409: Forced or Compulsory Labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	P. 181-182, 205, 207	
	EYDAP INDEX	EQUAL OPPORTUNITIES	P. 180-186	
11. Circular Economy	GRI 3: Material Topics	3-3 Management of material topics	P. 90-99	
	GRI 306: Waste	306-4 Waste diverted from disposal	Σελ.94-98	
12. Talent Attraction and Retention	GRI 3: Material Topics	3-3 Management of material topics	P. 197	
	GRI 401: Employment	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	P. 194	



13. Supply Chain Management	GRI 3: Material Topics	3-3 Management of material topics	P. 204-207	
	GRI 308 Supplier Environmental Assessment	308-1 New suppliers that were screened using environmental criteria	P. 205	
	GRI 414: Supplier Social Assessment	414-1 New suppliers that were screened using social criteria	P. 205	
		414-2 Negative social impacts in the supply chain and actions taken	P. 204-207	
	EYDAP INDEX	SUPPLY CHAIN OPTIMIZATION PROJECTS	P. 206	
14. Protection of Personal Data	GRI 3: Material Topics	3-3 Management of material topics	P. 179, 181, 183, 196, 200, 230, 235-238	
	GRI 418: Customer Privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	P. 238	



## Table of Contents based on the Athens Stock Exchange Guide

ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Environmental	C-E1-1	Scope 1 emissions - Total amount of direct emissions (Scope 1)	110,660.30	Tons CO <sub>2</sub> equivalent (tCO <sub>2</sub> e)	Emissions	76	
	C-E1-2	Scope 1 emissions - GHG intensity of Scope 1 emissions	322.16	Ratio	Emissions	77	The result was obtained by dividing the SCOPE 1 emissions (110,660.30 tCO <sub>2</sub> e) and the Company's turnover for 2022 (EUR 343.5 million)
	C-E2-1	Scope 2 emissions - Total amount of indirect emissions (Scope 2)	88,503.84	Tons CO <sub>2</sub> equivalent (tCO <sub>2</sub> e)	Emissions	76	
	C-E2-2	Scope 2 emissions - GHG intensity of Scope 2 emissions	257.65	Ratio	Emissions	77	The result was obtained by dividing the SCOPE 2 emissions (88,503,84 tCO <sub>2</sub> e) and the Company's turnover for 2022 (EUR 343.5 million)
	C-E3-1	Energy consumption and production - Total amount of energy consumed within the organisation	298,074.43	Megawatt hour (MWh)	Energy	85	
	C-E3-2	Energy consumption and production - Percentage of electricity consumed	53.28	Percentage (%)	Energy	85	
	C-E3-3	Energy consumption and production - Percentage of renewable energy consumed	41.84	Percentage (%)	Energy	85	
	C-E3-4	Energy consumption and production - Total amount of energy produced	146,991.38	Megawatt hour (MWh)	Energy	85	





ESG Classification	2022 Sub - ID	Metric		Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Environmental	C-E3-5	Energy consumption and production - Percentage of renewable energy produced	99.98	Percentage (%)	Energy	85	
	A-E1-1	Scope 3 emissions - Total amount of other indirect emissions (Scope 3)	19,912.18	Tons CO <sub>2</sub> equivalent (tCO <sub>2</sub> e)	Emissions	76	
	A-E1-2	Scope 3 emissions - GHG intensity of Scope 3 emissions	57.97	Ratio	Emissions	77	The result was obtained by dividing the SCPOPE 3 emissions (19,912,18 tCO <sub>2</sub> e) and the Company's turnover for 2022 (EUR 343.5 million)
	A-E2-1	Climate change risks and opportunities - Discussion of climate change-related risks and opportunities that can affect business operations	Yes - Disclosed		Climate Change Mitigation Strategies	86	1. The Category of ESG risks has been included in the Operational Risk Register 2. The Board of Directors is ultimately accountable for the implementation of an effective risk management framework 3. Innovative transformation actions with the installation of new equipment aiming to reduce carbon & energy footprint 4. Synergies with academic institutes
	A-E3-1	Waste management - Total amount of hazardous waste	11.61	Tons	Circular Economy	98	Batteries + Electrical & Electronical Equipment
	A-E3-2	Waste management - Total amount of non-hazardous waste	57,193.67	Tons	Circular Economy	91	All screening waste and grit, sand & large solids + dried waste produced from WWTPs + paper + plastic & aluminum + treated sludge produced from WTPs



ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Environmental	A-E3-3	Waste management - Percentage of waste by type of treatment - Recycled	61.05	Percentage (%)	Κυκλική Οικονομία	94	<p>Batteries + electrical &amp; electronical equipment + paper + plastic &amp; aluminum + dried sludge produced from WWTP</p> <p>1st Note: The treatment method of dried sludge produced at WWTP doesn't correspond to any of the listed treatment method of the questionnaire (Recycle, Compost, Incinerate, Landfill). Thus, the amount of treated sludge was included in the Recycle treatment method, as this type of treatment is the closet approximation to the actual treatment. Based on GRI disclosure the dried sludge is included to GRI 306-4c iii) other recovery operation as it is thermally recovered by the cement industry as an alternative fuel.</p> <p>2nd Note: The amount given (31.28 tons) of batteries+ electrical &amp; electronical equipment +paper &amp; aluminum is the actual quantity distributed for recycling</p>
	A-E3-4	Waste management - Percentage of waste by type of treatment - Composted	25.50	Percentage (%)	Κυκλική Οικονομία	91	The total amount of dried sludge generated at WTPs is composted
	A-E3-5	Waste management - Percentage of waste by type of treatment - Incinerated	0.00	Percentage (%)	Κυκλική Οικονομία	90	
	A-E3-6	Waste management - Percentage of waste by type of treatment - Landfilled	13.45	Percentage (%)	Κυκλική Οικονομία	94	All screening waste, grit and large solids generated during the pre-treatment phase at WWTPs are landfilled (tn)
	A-E4-1	Total amount of effluent discharge containing polluting substances	0	Cubic meters (m3)	Προστασία Οικοσυστημάτων	67	The treated effluent of the WWTPs discharge in the sea are free of their pollutant load at a rate of about 95%. Pollutants are either absent or within the acceptable limits of the relevant guidelines.



ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Environmental	A-E5-1	Biodiversity sensitive areas - Description of the impact of business operations on biodiversity sensitive areas	Yes - Disclosed		Protection of Ecosystem	69	1) "ecological water supply" in the river ecosystems downstream of dams. 2) monitoring of projects and activities in the protection zones of water catchment reservoirs 3) The treated effluent of the WWTPs discharge in the sea are free of their pollutant load at a rate of about 95% 4) Systematic monitoring of the Saronic and Elefsina Gulf from the Hellenic Centre for Marine Research (HCMR) 5) Schinias National Park: Special Ecological Assessment (SEA) studies are being conducted 6) EYDAP has commissioned the Hellenic Centre for Marine Research (HCMR) to monitor the marine ecosystem of the South Evian Gulf in order to document its current status. Then HCMR, will continue to monitor the region during the operation of the new Wastewater Treatment Centres (WWTPs).
	SS-E4-1	Water management - Description of water management risks and the respective mitigation measures taken	Yes - Disclosed		Sustainable management of natural resources/ water supply resources	58	1. Sustainable management of natural resources 2. Sustainable management of water network & systematic upgrading of the water supply network and facilities 3. East Attica project for holistic management of the region's wastewater and recycle water for irrigation use 4. Tiered Tariff 5. Reuse of Water Recycle by direct abstraction from the network (sewer mining) 6. Hadrian's Aqueduct as a water resource 7. Energy efficiency improvement 8. Carbon footprint reduction 9. Actions of Circular Economy 10. Digital services development
Social	C-S1-1	Stakeholder engagement - Discussion of organisation's main stakeholders and analysis of key stakeholder engagement practices	Yes - Disclosed		Materiality Analysis	50	1. Material Analysis 2. General Meetings of Shareholders 3. Official Website of EYDAP 4. Official special website "Katharo Nero" for continuous information about the progress of East Attica project 5. Social Media 6. Weekly internal electronic magazine (portal) "I Pigi mas" 7. Meeting and communication with stakeholders
	C-S2-1	Percentage of female employees	31.11	Percentage (%)	Diversity & Equal opportunities – Hyman Rights Protection	185	Percentage of women of all permanent employees



ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Social	C-S3-1	Percentage of women in managerial positions (i.e. top 10% of employees by total compensation)	56.64	Percentage (%)	Diversity & Equal opportunities – Hyman Rights Protection	185	
	C-S4-1	Employee turnover - Percentage of full-time employee voluntary turnover	2.83	Percentage (%)	Labor Practices	192	
	C-S4-2	Employee turnover - Percentage of full-time employee involuntary turnover	0	Percentage (%)	Labor Practices	192	
	C-S5-1	Employee training - Average training hours of employees in the top 10% of employees by total compensation	23.38	Number of hours	Employee Training & Development	201	Taken into account only employees holding a position of responsibility
	C-S5-2	Employee training - Average training hours of employees in the bottom 90% of employees by total compensation	6.91	Number of hours	Employee Training & Development	201	Taken into account employees who do not hold a position of responsibility
	C-S6-1	Human rights policy - Description of human rights policy and fundamental principles	Yes - Policy in place		Diversity & Equal opportunities – Hyman Rights Protection	182	The Policy applies to the Company as well as to any existing or future subsidiary, and its scope binds the Company's personnel with a dependent employment contract, personnel with a contract for services or otherwise independent, members of the Company's Board of Directors, other partners (contractors, suppliers, service providers, etc.). No violation will be tolerated and in fact, in case of violation of its principles, the procedure for imposing legal sanctions will be activated.





ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Social	C-S7-1	Percentage of employees covered by collective bargaining agreements	98.02	Percentage (%)	Labor Practices	182	
	C-S8-1	Supplier assessment - Discussion of supplier screening using ESG criteria	Yes - Disclosed		Circular economy management	204	1. Human rights Policy applies also to all partners (contractors, suppliers, service providers, etc.). 2. Application of UN Global Compact Principles to the conventions of the company's supply chain is implemented to the extent that the national legal framework on public procurement allows it 3. In addition to the contractual obligation, the contractors shall provide evidence such as certifications for quality, environmental, labor, energy management 4. Conflict of Interest Policy 5. Regulatory compliance 6. Regulatory of Supply chain
	A-S1-1	Sustainable economic activity - Percentage of sustainable turnover	Yes - Disclosed	0%	Taxonomy Regulation	243	
	A-S1-2	Sustainable economic activity - Percentage of sustainable CapEx	Yes - Disclosed	0%	Taxonomy Regulation	243	
	A-S1-3	Sustainable economic activity - Percentage of sustainable OpEx	Yes - Disclosed	0%	Taxonomy Regulation	243	
	A-S2-1	Total amount of monetary expenditure on employee training	291,206.52	Euros (€)	Employee Training & Development	202	Taken into account internal educative programs organized by the Training Department of EYDAP and the employees' attendance at seminars organized by external partners
	A-S4-1	CEO pay ratio - Total CEO pay	188,403.17	Euros (€)	Labor Practices	192	
	A-S4-2	CEO pay ratio - Ratio of CEO to median employee earnings	3.9685	Ratio	Labor Practices	192	



ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Social	SS-S6-1	Health and safety performance - Number of injuries	16	Number	Employee Health & Safety	168	The total number of accidents at work include road accidents caused during journeys on official business, as well as road accidents occurring when workers are going to or leaving their place of work, and within a period of 1 hour of the start or end of their working hours respectively.
	SS-S6-2	Health and safety performance - Number of fatalities	0	Number	Employee Health & Safety	168	
	SS-S6-3	Health and safety performance - Accident frequency rate	0.521	Number	Employee Health & Safety	168	The frequency ratios of occupational accidents have been calculated by assuming the total number of man-hours worked to be equal to 200,000.
	SS-S6-4	Health and safety performance - Accident severity rate	19.8	Number	Employee Health & Safety	168	The criterion for classifying an occupational accident as serious has been taken as the absence of a worker from work for a period of fifteen (15) days or more.
Governance	C-G1-1	Board composition - ESG related qualifications of the board members	Yes - Disclosed		Corporate Governance	223	The curricula vitae of all members of Board of Directors are posted on the Company's website.
	C-G1-2	Board composition - Classification of the Chairman of the Board	Non-executive		Corporate Governance	225	The chairman of the Board is non-Executive member
	C-G1-3	Board composition- Percentage of female board members	15.38	Percentage (%)	Diversity & Equal Opportunities	185	2 women out of a total of 13 members of the Board of Directors
	C-G1-4	Board composition- Percentage of non-executive board members	84.62	Percentage (%)	Corporate Governance	225	11 non-executive members out of a total of 13 members of the Board of Directors



ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Governance	C-G1-5	Board composition- Percentage of both non-executive and independent board members	30.8	Percentage (%)	Corporate Governance	225	4 members are independent, non-executive members out of a total of 13 members of the Board of Directors
	C-G2-1	Sustainability oversight - Description of approach to sustainability oversight	Yes - Disclosed		Corporate Governance	222	The Board of Directors ensures the supervision and management of the Company's Sustainable Development issues, within the framework of the Company's strategic planning. During its meetings, it discusses objectives related to sustainable development issues. Within the framework of the Sustainability Policy, the Board of Directors identifies in the Annual Management Report the non-financial issues that are deemed essential for the implementation of its strategy, taking into account the requirements of its stakeholders. The Report shall include a reference to the way they are managed and the evaluation of these actions on the basis of recognised international standards. The Board of Directors shall be assisted by the Strategy, Innovation and Sustainable Development Committee in all the above responsibilities.
	C-G3-1	Materiality - Description of the materiality assessment process	Yes - Disclosed		Materiality Analysis	48	1.Identification of the Company's positive and negative impacts 2.Assessment and prioritisation of the Company's impacts 3.Assessment and prioritisation of material topics
	C-G4-1	Sustainability policy - Description of sustainability policy and fundamental principles	Yes - Policy in place		Sustainable Development Strategy - Corporate Governance	34	Sustainable Development Policy which is completely aligned with the Company's strategy, mission, values and vision.
	C-G5-1	Business ethics policy - Description of business ethics policy and fundamental principles	Yes - Policy in place		Diversity & Equal Opportunities	181	A new Code of Ethics and Professional Conduct came into force as of November 2022, which clearly sets out the ethical principles and values as well as internal rules of conduct that must be observed by all those who have an employment or cooperation relationship with EYDAP SA. The Code is based on international standards and best practice methods and aligned with relevant regulatory requirements.



ESG Classification	2022 Sub - ID	Metric	Value	Unit	Reference Sustainability Report 2022	Page Number	Comments from Company
Governance	C-G6-1	Data security policy - Description of data security policy and fundamental principles	Yes - Policy in place		Sustainable Development Strategy	231	Information Security Policy of EYDAP is an internal document. The Policy is also referred to the Annual Financial Report pages 92 and 127.
	A-G1-1	Business model - Discussion of business model and the creation of value	Yes - Disclosed		Business Model	25	1. Material Collaborations 2. Main Activities 3. Main Sources 4. Cost Structure 5. Competitive Advantage 6. Costumers 7. Communication Channels 8. Revenue Structure
	A-G2-1	Total amount of monetary losses as a result of business ethics violations	0	Euros (€)	Fight against corruption	233	
	A-G3-1	ESG targets - Short-term targets associated with strategic ESG objectives	Yes - Disclosed		Sustainable management of natural resources/ water supply resources	58	1. "Smart grid" 2. Transition to electrification 3. Installation of new Photovoltaic panels 4. Increase in RES generation 5. Utilization of water of Hadrian's Aqueduct for irrigation use 6. Reuse of direct abstraction from the network "sewer mining" " 7. Digital transformation
	A-G3-2	ESG targets - Medium-term targets associated with strategic ESG objectives	Yes - Disclosed		EYDAP Wastewater Network – Wastewater Collection & Treatment	156	1. East Attica project 2.Expanding the Network system 3. Energy and carbon footprint reduction 4. Digital upgrade
	A-G3-3	ESG targets - Long-term targets associated with strategic ESG objectives	Yes - Disclosed		Climate Change mitigation Strategies	86	1. Carbon footprint reduction (net zero) 2. Corporate resilience
	A-G5-1	External assurance - Discussion of external assurance on reported ESG information	Yes - Certain metrics have been externally assured		Independent Auditor's Limited Assurance Report	279	





## Table of Contents based on the SASB (Water Utility & Services) Standard

Subject	SASB Index		Description	Reference
Energy Management	(1) Total energy consumed, (2) percentage grid electricity (3) percentage renewable	IF-WU-130a.1	(1) Total consumption of energy: 1,073,068 GJ/ 298,074.43 MWh (2) Percentage of electric energy purchased: 53.28% (3) Percentage of electric energy consumed from Renewable Sources: 41.84%	P. 85
Distribution Network Efficiency	Water main replacement rate	IF-WU-140a.1	0.51% (73.304km/14,300km)	P. 117 & 118
	Volume of non-revenue real water losses	IF-WU-140a.2	56,797.541K m <sup>3</sup> Actual water loss refers to the disparity between the overall water losses and apparent losses, which encompass unauthorized consumption and errors in metering and measurement	P. 117
Effluent Quality Management	Number of incidents of non-compliance associated with water effluent quality permits, standards, and regulations	IF-WU-140b.1	During the reporting period, no incidents of non-compliance with regulations and voluntary rules related to the quality of water supply water and with negative impacts on CONSUMER HEALTH and SAFETY were identified.	P. 155
	Discussion of strategies to manage effluents of emerging concern	IF-WU-140b.2	<ul style="list-style-type: none"><li>• The disposal and treatment of sewage to Metamorfosis WWTP, from areas that lack a sewerage network- contributes to the uncontrolled disposal of effluents at the environment</li><li>• In case of force majeure the safety overflow operates to ensure continuous and uninterrupted operation of the WWTP</li><li>• Monitoring of industrial wastewater through sampling at EYDAP laboratories</li></ul> In the context of addressing incidents related to the inflow of wastewater of non-standard urban composition in the WWTP of Psyttaeia, carried out a research project on "Collection, Processing and Analysis of Time Series of Qualitative and Quantitative Parameters at the Entrance and Exit of Psyttaeia WWTP for the Detection and Probabilistic Modeling of Emergency Charging Incidents". The objective was to understand and quantify the influence of charging emergencies on the smooth operation of the plant.	P. 138-163



Subject	SASB Index		Description	Reference
Water Affordability & Access	Average retail water rate for (1) residential, (2) commercial, and (3) industrial customers	IF-WU-240a.1	1. Average price of invoiced revenue per cubic meter for the General Rate (€/m³) 1.22 2. Average price per cubic meter for the Industrial - Professional Rates (€/m³) 1.11	P. 172
	Typical monthly water bill for residential customers for 10 Ccf of water delivered per month	IF-WU-240a.2	Average quarterly bill payable price for the General Rate (including VAT) (€): Approximately 33 € and 11 € /month	P. 172
	Number of residential customer water disconnections for non-payment, percentage reconnected within 30 days	IF-WU-240a.3	Water supply interruption due to outstanding debts in 2022 occurred in 90,001 water supplies. Within 30 days, 62% were reconnected.	P. 177
	Discussion of impact of external factors on customer affordability of water, including the economic conditions of the service territory	IF-WU-240a.4	EYDAP always committed to its social role, supported customers by maintaining its affordable tariff while continuing the investment program. <ul style="list-style-type: none"> <li>• Tiered tariff</li> <li>• Special tariff for professional use</li> <li>• Charity tariff</li> <li>• Upgrade/enhancement of digital services</li> <li>• Preventing measures to avoid the increase of debts</li> <li>• Supporting social vulnerable groups</li> <li>• Supporting large families</li> <li>• Supporting senior citizens</li> <li>• Discount on increased bills, taking into account social and income criteria and applying institutionalized procedures.</li> </ul>	P. 45, 172, 176-178



Subject	SASB Index		Description	Reference
Drinking Water Quality	Number of (1) acute health-based, (2) nonacute health-based, and (3) non-health-based drinking water violations	IF-WU-250a.1	During the reporting period, no incidents of non-compliance with regulations and voluntary rules related to the quality of water supply water and with negative impacts on CONSUMER HEALTH and SAFETY were identified.	P. 135
	Discussion of strategies to manage drinking water contaminants of emerging concern	IF-WU-250a.2	<ul style="list-style-type: none"> <li>• Protection of reservoirs by: strictly adhering to legislation (Health Regulation A5/2280/1983) "on the protection of water used for the water supply of the Athens region against pollution and contamination" and to Presidential Decree 51/2007 on establishing measures and procedures for the integrated protection and management of water, in compliance with the provisions of Directive 2000/60/EC</li> <li>• Four (4) Water Treatment Plants</li> <li>• Five (5) Treatment Stages</li> <li>• Continuously upgrading the water quality monitoring mechanisms and enriching the list of substances monitored (including new emerging pollutants).</li> <li>• In EYDAP's certificated laboratories, are applied for the determination of the elements required in water samples in order to achieve high sensitivity, accuracy and repeatability of measurements.</li> <li>• EYDAP often collaborates with Greek Educational and Research Institutions (NKUA, EKEFE Demokritos, Hellenic Atomic Energy Commission, etc.), which are among the European leaders in their field.</li> <li>• Sophisticated systems for on-line monitoring of critical quality parameters in untreated and potable water are installed in nodal locations, and send real-time results</li> <li>• Approximately 170,000 analyses on about 10,000 drinking water samples and 2,000 untreated water samples per year, EYDAP constantly certifies that Athens' water is of excellent quality and one of the best in Europe.</li> </ul>	P. 59,66,107, 122- 135
End-Use Efficiency	Percentage of water utility revenues from rate structures that are designed to promote conservation and revenue resilience	IF-WU-420a.1	The information is not measured during the reporting period.	
	Customer water savings from efficiency measures, by market	IF-WU-420a.2	The information is not measured during the reporting period.	



Subject	SASB Index		Description	Reference
Water Supply Resilience	Total water sourced from regions with High or Extremely High Baseline Water Stress, percentage purchased from a third party	IF-WU-440a.1	"EYDAP Fixed Assets" company provides EYDAP AE with untreated water	P. 27-28, 31, 33, 106
	Volume of recycled water delivered to customers	IF-WU-440a.2	0%	
	Discussion of strategies to manage risks associated with the quality and availability of water resources	IF-WU-440a.3	<p>EYDAP has carried out an analysis and assessment of the risks it may face in this area. For none of them, the probability of occurrence is considered high. For each risk case, a relevant preventive action plan has been developed and implemented.</p> <p>EYDAP ensures the protection of reservoirs by complying with strict legislation, monitoring of projects and activities in the protection zones of water catchment reservoirs and sample measurements of reservoir water quality.</p> <p>Management of the water supply system based on Management Plan aiming the quantitatively reliable, qualitatively and environmentally safe and economically efficient coverage of the demand for water supply in the area under EYDAP's competence, through the appropriate use of the water resources available for the coverage of this demand.</p> <p>Allocation of water abstraction, in order to ensure the long-term adequacy of the water supply resources. It also includes additional works to reinforce the water supply system.</p> <p>SMART GRID: managing water demand by developing leakage reduction programs. Development of the "Smart Grid".</p> <p>Water quality:</p> <p>α. The number of drinking water samples tested for microbiological parameters exceeds 9,000 per year compared to the 3,300 required by legislation.</p> <p>β. Certifications: The Galatsi and Acharnes Chemical Laboratories and the Microbiological Laboratory are accredited according to ELOT EN ISO 17025 already since 2005, by the National Accreditation System (ESYD), for the performance of tests for the determination of chemical and microbiological parameters in untreated and drinking water (Certificate No. 192).</p> <p>γ. Synergies with Greek Educational &amp; Research Institutions Scientific in order to investigate specific water quality issues.</p> <p>HADRIAN'S AQUEDUCT AS A WATER RESOURCE – Participation in the European Cultural HIDRANT</p> <p>Utilization of water from Hadrian's Aqueduct for the irrigation of green areas of the municipality of Chalandri.</p> <p>SEWER MINING: Innovative solutions using water by direct abstraction from the network</p> <p>East Attica Project: ΕΡΓΑ ΑΝΑΤΟΛΙΚΗΣ ΑΤΤΙΚΗΣ: Holistic management of and treatment of the region's wastewater in order to reuse of treated effluents for urban and exurban use.</p>	P. 58-66, 107-135, 158-161





Subject	SASB Index		Description	Reference
Network Resiliency & Impacts of Climate Change	Wastewater treatment capacity located in 100-year flood zones	IF-WU-450a.1	The published maps of the Ministry of Natural Resources mention that the Psyttaleia, Metamorphosis and Thriasio WWTPs are not located in flood risk areas with a recovery period of 100 years.	P. 143
	(1) Number and (2) volume of sanitary sewer overflows (SSO), (3) percentage of volume recovered	IF-WU-450a.2	Wastewater overflow due to heavy rainfall is acceptable according to the relevant article (clause d.5 par. 5.2, 5.3) of the environmental operational terms of the Psyttalia WWTP. Based on the data on wastewater flows to be treated at the Psyttalia WWTP and on the capacity of the pumping station at the Akrokeramos inlet, it is estimated that the overflow in 2022, due to flooding, was 2,021,222 m³.	P. 155
	(1) Number of unplanned service disruptions, and (2) customers affected, each by duration category	IF-WU-450a.3	(1) 7,453 (2) Not measured	P. 117
	Description of efforts to identify and manage risks and opportunities related to the impact of climate change on distribution and wastewater infrastructure	IF-WU-450a.4	For the management of Climate Change:• Βιώσιμη διαχείριση ταμιευτήρων • Sustainable management of water resources/reservoirs • Sustainable management of Water Supply Network. Continuous upgrade of networks and facilities • East Attica project for holistic management of the region's wastewater and utilization of the recycled water for irrigation. • Tiered tariff • Reuse of reclaimed water by direct abstraction from the sewerage network– sewer mining • Utilization of water from Hadrian's Aqueduct • Improve energy efficiency • Reduction of footprint carbon • Circular Economy Actions • Development of Digital systems	P. 58-67, 86-89 , 90-99, 108-120, 158-159, 172, 241
Activity Metrics	Number of: (1) residential, (2) commercial, and (3) industrial customers served, by service provided	IF-WU-000.A	Total of 2,247,915 water connections 2,207,237 connections are for household use 3,812 connections for industrial/professional use	P. 171- 172
	Total water sourced, percentage by source type	IF-WU-000.B	439,000,000 m³ at 2022 99.3% from surface water resources 0.7% from underground water resources	P. 114
	Total water delivered to: (1) residential, (2) commercial, (3) industrial, and (4) all other customers	IF-WU-000.C	The annual drinking water distribution for the year 2022 was 384,123,724 m³	P. 112
	Average volume of wastewater treated per day, by (1) sanitary sewer, (2) stormwater, and (3) combined sewer	IF-WU-000.D	The average daily treatment of effluents was 700,330m³	P. 136
	Length of (1) water mains and (2) sewer pipe	IF-WU-000.E	(1) 14,300 km of Water Supply network (primary, secondary and tertiary network) (2) 495 km External Water Supply network (3) 8,598 km of Sewerage network	P. 108, 112, 140

# The 10 Principles of the UN Global Compact



## ENVIRONMENT

7th Businesses should support a precautionary approach to environmental challenges.

8th Undertake initiatives to promote greater environmental Responsibility.

9th Encourage the development and diffusion of environmentally friendly technologies.

- Sustainable Development Policy (p. 34, [Link here](#))
- Climate Change Mitigation Strategies (p.71-89)
- Regulatory & Environmental Compliance EYDAP (p. 99)
- Slower mining (p. 61-62)
- Protection of Ecosystem (p. 67-70)
- Circular Economy (p. 90-98)
- Sustainable Management of Natural Resources/Water Supply Resources (p. 58-66)
- East Attica Projects with holistic management of wastewater (p. 156-163)
- Local Community - Environmental Awareness (p. 208-213)
- Tiered Pricing (p. 34, 45, 60, 169, 172)



## Society

### Human Rights

1st Businesses should support and respect the protection of internationally proclaimed human rights.

2nd Businesses make sure that they are not complicit in human rights abuses.

### Labour

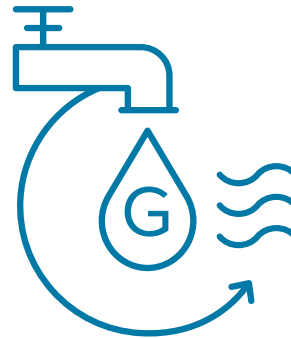
3rd Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

4th Businesses should uphold the elimination of all forms of forced and compulsory labour.

5th Businesses should uphold the effective abolition of child labour.

6th Businesses should uphold the elimination of discrimination in respect of employment and occupation.

- Human Rights Policy (p. 182, [Link here](#))
- Diversity & Equal Opportunities – Human Rights Protection (p. 180-186, 205)
- Health & Safety of Workers (p. 164-168)
- Protection of Personal Data (p. 179, 196, 230-231, 235-238)
- Code of Ethics and Professional Conduct (p. 181, 232, [Link here](#))
- Access to clean water (p. 104-114)
- Reliable Water Supply Network (p. 115-121)
- Excellent Quality of Drinking Water (p.58-62, 122-135)
- Wastewater Network (p. 136-163 )
- Secure Customer Service - Affordable Tariff (p. 169-179)
- Supply Chain Management (p.204-207)
- Collective Agreement of Employment (p. 182)
- Right To Unionize (p. 183)
- Talent Attraction & Retention (p. 197)
- Employee Training & Development (p. 198-203)
- Support to Society (p. 177-178, 208-213 )



## GOVERNANCE

### Anti-Corruption

10th Businesses should work against corruption in all its forms, including extortion and bribery.

- Policies & Regulations (p. 223-225, 229-234, 236)
- Anti-Corruption and Anti-Bribery Policy (p.229, [Link here](#))
- Whistleblowing Policy (p.194, 196, 207, 231 [Link here](#))
- Fight against corruption (p. 228-233)
- Protection of Personal Data (p. 179,196,230-231, 235-238)
- Supply Chain Management (p. 204-207)
- Regulatory Compliance and Policies Training Programs (p. 199-200)
- ISO Certifications (p. 36)



# Independent Limited Assurance Report

## To the Board of Directors of EYDAP S.A.

The Board of Directors of “EYDAP S.A.” (hereinafter “the Company”) **engaged** “GRANT THORNTON S.A. CHARTERED ACCOUNTANTS MANAGEMENT CONSULTANTS” (hereinafter “Grant Thornton”) **to review** selected data included in the 2022 Sustainability Report of EYDAP S.A. for the fiscal year ended on December 31st, 2022 (hereinafter “the selected data”), having as basis the Global Reporting Initiative (GRI) Standards (hereinafter “GRI-Standards”) and the “in accordance” approach.

## Scope

We performed our engagement in accordance with the provisions of “International Standard on Assurance Engagements 3000 (Revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information” (“ISAE 3000”), in order to provide limited assurance on the below:

- Response to GRI 2: General Disclosures
- Determine and report material topics, responding to GRI 3: Material Topics (materiality analysis process)
- The accuracy and completeness of the qualitative and quantitative information of the below selected indicators which are related to the material issues of the Company:
  1. ATHEX A-S-4 CEO pay ratio
  2. ATHEX SS-S9 Customer grievance mechanism
  3. ATHEX SS-S6: Health and Safety performance
  4. ATHEX SS-S4 Labour law violations
  5. ATHEX C-S7-1 Collective bargaining agreements
  6. ATHEX C-S3 Female employees in management positions

7. SASB IF-WU-450a.3 Number of unplanned service disruptions and customers affected
8. SASB IF-WU-240a.1 Average retail water
9. SASB IF-WU-140b.1 Number of incidents of non-compliance associated with water effluent quality permits, standards, and regulations
10. SASB IF-WU-130a.1 total energy consumed.
11. SASB IF-WU-000.D Average volume of wastewater treated per day
12. GRI 302-1 Energy consumption within the organization
13. GRI 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data.
14. GRI 403-9 Work-related injuries,
15. GRI 401-1 New employee hires and employee turnover
16. GRI 305-5 Reduction of GHG emissions
17. GRI 303-3 Water withdrawal
18. GRI 2-27 Compliance with laws and regulations
19. GRI 2-26 Mechanisms for seeking advice and raising concerns
20. GRI 2-25, Processes to remediate negative impacts
21. EYDAP index whistleblowing.

## Management Responsibility

The Management of EYDAP S.A. is responsible for the preparation, completeness, accuracy and presentation of the selected data provided to us, as incorporated in the 2022 Sustainability Report of the Company. Furthermore, the Management is responsible for maintaining records and adequate internal controls that are designed to support the reporting process.

## Grant Thornton Responsibility

Our responsibility is to carry out a limited assurance engagement and to express our conclusions based on the procedures carried out for the selected data, as described in the “Scope” section. The procedures we carried out were designed to provide limited assurance, as specified by ISAE 3000, based on which we shaped the conclusion to our engagement. These procedures are not as extensive as those required for providing reasonable assurance; consequently, a lower level of assurance is obtained.

Our responsibility is limited to the information related to the fiscal year that ended on December 31, 2022, as these were included in the 2022 Sustainability Report of the Company. To the extent it is permitted by the legislation in force, we neither accept nor assume any responsibility for our engagement or this report towards anyone other than the Company, unless the terms have been agreed explicitly in writing, with our prior consent.

## Limitations

- To conduct our work, we relied exclusively on the information provided to us by the Company's executives, which we accepted in good faith as being complete, accurate, real, and not misleading. Therefore, we did not submit it to any verification procedures, apart from the procedures explicitly stated in our Report and which arise from our mutually agreed methodology.
- Our engagement was limited to the Greek version of the 2022 Responsibility and Sustainability Report. Therefore, in the event of any inconsistency in translation between the Greek and English versions, as far as our conclusions are concerned, the Greek version of the Report shall prevail.
- No work has been conducted on data for previous reporting periods, as well as on data related to forecasts and targets.
- No work has been conducted on anything other than the agreed scope and consequently, our opinion is limited to that scope.

## Work conducted

We conducted our work so as to collect all the data, relevant documentation, information and explanations we considered necessary as to the selected data described in the "Scope" section. The procedures followed regarding the selected data included:

- Performed interviews with personnel of the Company responsible for managing, collecting and processing data in order to obtain an understanding of key structures, systems, policies and relevant procedures applied.
- Applied audit procedures, on a sample basis, in order to collect and review audit evidence.
- Review of the GRI Table included in the 2022 Sustainability Report of the Company regarding the scope of work.

## Independence

Grant Thornton implements the requirements of International Standard on Quality Control 1. Based on this, it maintains an integrated quality control system that includes policies and procedures for compliance with moral principles, professional standards and relevant legal and regulatory requirements. We comply with the independence requirements and other ethical standards of the IFAC Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, impartiality, professional adequacy, confidentiality and professional conduct. In this context, the assurance team is independent from the Company and has not participated in the preparation of the Company's 2022 Sustainability Report.

## Conclusion

As per the scope and the limitations of our engagement, as described above, we conclude that:

- nothing has come to our attention that causes us to believe that the 2022 Sustainability Report of the Company does not meet the requirements of the General and Specific Disclosures prescribed by the GRI Standards and the “In accordance” approach
- nothing has come to our attention that causes us to believe that the KPIs as described in “Scope” section and included in the Company’s 2022 Sustainability Report are materially misstated.

Athens, 30/10/2023

The Chartered Accountant

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**Athina Moustaki**  
CPA (GR) Reg. 28871



**Grant Thornton**

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EYDAPP

