

# Sustainability Policy Athens International Airport S.A.

| Date of entry into force: | 07.02.2024                                                                                                       |
|---------------------------|------------------------------------------------------------------------------------------------------------------|
| Edition number:           | 5                                                                                                                |
| Approval:                 | This Policy has been approved by the Board of Directors of the Company by virtue of resolution dated 30.11.2023. |



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## 1. Purpose & Scope

This Policy encloses AIA's commitment to contribute to sustainable development through a balanced multifaceted approach that takes into account the social, environmental, and economic aspects of business with a long-term perspective. More specifically, this Policy entails the development of the core elements of AIA's Sustainability Planning and Reporting, namely the Materiality Analysis and the Annual Sustainability Strategic Planning, towards embedding sustainability into corporate processes and orchestrating a cross-departmental effort across the Company.

This Policy defines the framework to identify and manage the ESG-related Material Topics for AIA, considering the views and priorities of its stakeholders. Additionally, it describes the Sustainability Governance Structure within the Company, specifying areas of responsibility, individual tasks, and forms of cooperation between the relevant roles, departments, and bodies.

The Policy describes the actions related to the production of AIA's Sustainability Reporting Editions, including the Integrated Financial & Non-Financial Report specifying areas of responsibility, individual tasks, and the Report's verification by an external independent assurance body for adherence to the adopted Global Standards and Guidelines.

Moreover, this Policy sets out the basic principles that must be met in order to respond to the latest and most critical ESG-related challenges and priorities, while ensuring the Company's contemporary approach to sustainability.

This Policy is applicable to all AIA Employees and the members of the Board of Directors.

#### 2. Definitions & Abbreviations

The following terms and abbreviations are used in this policy:

| Term/ Abbreviation      | Definition of Term/ Abbreviation                                             |
|-------------------------|------------------------------------------------------------------------------|
| ABU                     | Aviation Business Unit                                                       |
| ACI                     | Airports Council International                                               |
| Annual & Sustainability | A corporate publication, which presents the Financial and Non-Financial      |
| Report                  | Performance in line with Standards applicable to AIA.                        |
| Audit Committee (AC)    | The Audit Committee of the Company's Board of Directors                      |
| BoD                     | The Board of Directors of the Company                                        |
| CBU                     | Consumers Business Unit                                                      |
| CMA                     | Communications & Marketing Department                                        |
| Corporate Citizenship   | Engaging communities based on mutual respect, advancing social partnership   |
| (from a Sustainability  | and prosperity in the region, promoting Athens as a travel destination,      |
| perspective)            | promoting the culture and heritage of Greece, supporting humanitarian causes |
| perspective             | for society at large and respecting human rights.                            |



| Term/ Abbreviation          | Definition of Term/ Abbreviation                                                |
|-----------------------------|---------------------------------------------------------------------------------|
|                             | The annual corporate process for defining non-financial objectives, inclusive   |
| Corporate Scorecard         | of sustainability indicators, submitted by the Management for the approval of   |
|                             | the Board of Directors.                                                         |
|                             | Corporate sustainability is an approach aiming to create long-term stakeholder  |
| Corporate Sustainability    | value through the implementation of a business strategy that focuses on the     |
| Corporate Sustainability    | ethical, social, environmental, cultural, and economic dimensions of doing      |
|                             | business.                                                                       |
| CSO                         | Chief Strategy Officer                                                          |
| Employer's Responsibility   | Developing, compensating, and engaging our human capital, while                 |
| (from a Sustainability      | maintaining a committed workforce that drives productivity and value in a safe  |
| perspective)                | and fair working environment.                                                   |
| ENA                         | Energy & Asset Management Department                                            |
| ENC                         | Environmental Services Department                                               |
| Environmental               | Undertaking commitments and initiatives to minimize environmental impact        |
|                             | from airport operations, implementing efficient energy management practices,    |
| Responsibility (from a      | as well as communicating and raising awareness regarding environmental          |
| Sustainability perspective) | issues.                                                                         |
| ESG                         | Environmental, Social & Governance.                                             |
|                             | The Global Reporting Initiative Standards for Sustainability Reporting,         |
| GRI Standards               | featuring specific methodology for the design and implementation of             |
|                             | Materiality Analysis.                                                           |
| HRE                         | Human Resources Department                                                      |
| Management                  | Chief Officers, Directors, Managers, Heads.                                     |
| Managing Director (CEO)     | Managing Director (Chief Executive Officer)                                     |
| Material sustainability-    | Top priority sustainability-related issues for the Company that emerge through  |
| related issues              | the Materiality Analysis Process.                                               |
|                             | The determination of material topics that relate to the organization's ongoing  |
| Materiality Analysis        | identification and assessment of impacts for AIA and its Stakeholders and the   |
|                             | reporting of disclosures of relevant standards (e.g., GRI).                     |
|                             | Running the airport efficiently, in compliance with the applicable legal/       |
| Operational Responsibility  | regulatory framework and in line with international best practice, as well as   |
| (from a Sustainability      | acting on public interest with respect to safety and service quality. Fostering |
| perspective)                | an airport community culture through cooperation and by acting fairly and       |
|                             | with integrity towards third parties.                                           |



| Term/ Abbreviation        | Definition of Term/ Abbreviation                                                  |
|---------------------------|-----------------------------------------------------------------------------------|
| PRC                       | Procurement Department                                                            |
| Senior Management         | Chief Officers                                                                    |
| SPR                       | Sustainability Strategic Planning & Reporting Department                          |
|                           | Groups of persons, organizations, systems that affect or can be affected by       |
| Stakeholders              | AIA operation. AIA's Stakeholders include Shareholders, Employees, Airport        |
|                           | Business Partners, Suppliers, Local Communities, Passengers, Customers,           |
|                           | State Authorities, the International Aviation Community and Greater Society.      |
|                           | The Sustainability Committee is designated and authorized by the CEO and          |
|                           | consists of the SPR Head, Sustainability, and Industry Affairs (Chair), Director  |
|                           | CBU, Director CMA, Director HRE, Director ABU, Director, Financial Services,      |
| Sustainability Committee  | Manager ENC, Manager PRC, and Manager ENA. The aforementioned                     |
|                           | members of Sustainability Committee, under the coordination of the Head of        |
|                           | SPR, cooperate to develop AIA's Annual Materiality Analysis, to provide input     |
|                           | for the Sustainability Strategic Planning and orchestrate its implementation.     |
|                           | Aligning with the provisions of contemporary sustainability standards and         |
|                           | guidelines, performing Materiality Analysis of the issues significant for AIA and |
| Sustainability Governance | its Stakeholders, planning actions for material topics, transparently reporting   |
|                           | and being assured by an external independent third party for this, on corporate   |
|                           | performance and promoting sustainability principles across AIA's value chain.     |
| Sustainability Strategic  | Refers to the prioritization of issues through the Materiality Analysis and the   |
| Planning                  | emerging Company priorities that are translated into action.                      |
| The Company               | The company under the name Athens International Airport S.A. (AIA)                |
| United Nations Global     | Voluntary initiative of the United Nations, encouraging businesses worldwide      |
| Compact (UNGC)            | to adopt sustainable and socially responsible policies, and to regularly report   |
| compact (orvac)           | on their implementation.                                                          |
|                           | The United Nations' Sustainable Development Goals (SDGs) consist of               |
| United Nations            | seventeen interconnected objectives, providing a "shared blueprint for peace      |
| Sustainable Development   | and prosperity for people and the planet, now and in the future." The SDGs        |
| Goals (SDGs)              | highlight the interrelated environmental, social, and economic aspects of         |
|                           | sustainable development, with sustainability as their core.                       |

## 3. References

- Directive 2014/95/EU: Disclosure of non-financial and diversity information
- The 10 UN Global Compact Principles
- UN Guiding Principles on Business and Human Rights (2011)



- UN Sustainable Development Goals (2015)
- ACI Sustainability Strategy for Airports (2<sup>nd</sup> edition, 11/2020)
- Global Reporting Initiative Standards (2021)
- International Financial Reporting Standards (IFRS)

## 4. Sustainability Policy Statement

The Airport Company's strategic vision towards a Sustainable Business Model intergrates, taking into account its multidimensional manner, the social, environmental and economic aspects across key areas of its operation and value chain. More specifically, the structured governance system in place, embeds international best practices in planning, implementation, measuring and transparently reporting ESG-related performance.

AIA, as a good corporate citizen aiming to create sustainable value for its Stakeholders, acknowledges the importance of balancing the social, environmental and economic responsibility objectives across the Company. In line with the Company's sustaining commitment to the United Nations Global Compact (UNGC), AIA adopts and upholds the related sustained principles for human rights, labour relations, environmental impact and anti-corruption. Furthermore, the Company acknowledges and adheres to the United Nations' Sustainable Development Goals (SDGs) and the Agenda 2030, while also actively contributing to the national and global efforts towards addressing major sustainability challenges.

This policy sets AIA's sustainability "index" and is aligned with AIA's other related AIA's policies. It has a corporate-wide scope and it is applicable to all AIA Units and Departments.

## 5. Governance & Responsibilities

The development, approval and update of the Airport's purpose, value, mission, strategy and goals identify with sustainable development, which is led by the Chief Strategy Officer (CSO) who orchestrates the management of the associated impacts through a dedicated team, namely the Sustainability Strategic Planning and Reporting Department (SPR) under the Head, Sustainability and Industry Affairs.

#### Furthermore,

#### > The Audit Committee of the Board of Directors:

- Reviews agreements, independence and quality of advisors engaged by the Management to provide
  assurance on Sustainability reporting (after the Corporate Sustainability Reporting Directive took
  effect, the "Annual Integrated Report"),
- Provides structured and systematic oversight of the Company's financial and non-financial reporting,
   in accordance with the existing regulatory framework and global practice.

#### The Managing Director (CEO):

- Endorses this Policy, approves the corporate strategic priorities, and drives their application across
  the Company,
- Reviews and approves the transition plans for climate change mitigation, along with the Corporate



- Scorecard preparation process, inclusive of sustainability indicators as set by the respective responsible Units and Departments for subsequent approval by the Board of Directors,
- Approves the Sustainability Strategy, and the Company's financial and non-financial reporting, in accordance with the existing regulatory framework and standards (after the Corporate Sustainability Reporting Directive took effect, the "Annual Integrated Report").

#### > The Chief Strategy Officer (CSO):

- Presents to the CEO the Sustainability Strategic Approach and the related processes, methodology and results,
- Shapes and oversees the implementation of the Sustainability Strategic approach across the Company and follows up on the sustainability performance indicators,
- Recommends policies and policy amendments, and addresses issues related to the Company's sustainability vision and objectives,
- Coordinates the Corporate Scorecard preparation process, inclusive of sustainability indicators set by the responsible Units and Departments for subsequent approval by the CEO,
- Oversees the Sustainability Assurance process and liaises with the Audit Committee of the BoD for the annual review of the Sustainability Assurance Engagement,
- · Reviews and approves the result of the Materiality Analysis, and
- Reviews and approves Company's financial and non-financial reporting, in accordance with the
  existing regulatory framework and global (after the Corporate Sustainability Reporting Directive took
  effect, the "Annual Integrated Report").

#### > The **Sustainability Committee** Members:

- Identify, manage, and monitor material impacts, risks, and opportunities (IROs); thus, assess
  whether a sustainability topic is material from either an impact perspective, a financial perspective,
  or both,
- Review updates to the Sustainability Policy, as proposed by the Head, Sustainability and Industry Affairs, and Chair of the Committee, when necessary,
- Propose relevant Airport Community Stakeholders within their area of responsibility to provide input on AIA's material topics (Materiality Analysis),
- Actively engage in the Materiality Analysis and approve its outcome,
- Approve the final draft of contributions to the Company's financial and non-financial reporting, in accordance with the existing regulatory framework and global standards (following the Corporate Sustainability Reporting Directive, referred to as the "Annual Integrated Report"),
- Contribute to the development and review of sustainability-related actions and initiatives within their area of responsibility, and
- Propose, introduce, and evaluate initiatives and actions related to the Company's ESG performance within their area of responsibility.



#### > The **Director, CMA**, member of the Sustainability Committee:

- Proposes the graphic design of the Annual and Sustainability Report (ASR) for approval by the Chief Strategy Officer (CSO),
- Proposes the inclusion of actions/initiatives related to her area of responsibility in the Sustainability Strategic Planning,
- Prepares a comprehensive communication strategy to promote the Company's ESG approach towards multiple audiences per Senior Management's approval, and
- Ensures that AIA's Sustainability Reporting Editions, including the Integrated Financial & Non-Financial Report are communicated based on the Corporate Communication Standards and Practices.

#### The Manager, Passengers & Business Marketing:

 Proceeds with actions necessary for the preparation of the graphic design of AIA's Sustainability Reporting Editions, including the Integrated Financial & Non-Financial Report, following approval by the Director, CMA and the CSO.

#### > The Head, Sustainability and Industry Affairs & Chair of the Sustainability Committee:

- Oversees the implementation and further evolution of the Corporate Sustainability Strategy.
   Designs and/or suggests the integration of sustainability in the Company's business strategy, processes, and activities, as well as collaborates with the competent subject-matter experts, in order to effectively implement the Corporate Sustainability Strategy.
- Defines the Company's ESG Framework and objectives, tracks, and reports on the Company's strategic sustainability goals.

#### Within this framework:

- Works closely with the Management to promote value-adding sustainability-related performance by providing input regarding sustainability on various platforms and sectors across the Company,
- Reviews sustainability initiatives across various projects, identifies and promotes best practices on sustainability, and
- Oversees the overall execution, and efficacy of sustainability initiatives/ actions.
- Oversees the identification of the material sustainability-related topics, as well as their Impact,
  Risks and Opportunities (IROs) related to the Company and planning in collaboration with the
  competent Business Units, ensures their management is integrated into daily operations and project.
  In particular:
  - Stays up to date and evaluates national and international emerging regulations, industry trends and sustainability indicators/ reporting standards, based on their relevance to the Company's business model and **informs the Sustainability Committee** and the competent Units/ Departments towards coming up with a comprehensive approach for their implementation, where this is required and/or possible,



- Leads the Annual Materiality Analysis, acting as the focal point of dialogue and communication both for the Sustainability Committee and for selected Stakeholders. Within this framework, the Head, Sustainability and Industry Affairs, actively engages with and reviews input collected from Stakeholders to effectively manage potential ESG risks and leverage opportunities for enhanced collaboration, and
- Coordinates the development and implementation of sustainability-related actions and initiatives along with the Management, ensures they align, to the extent possible, with the material topics that emerge from the Materiality Analysis and tracks progress towards the set ESG targets.
- Leads the preparation and delivery of the corporate Sustainability Reporting Editions.
   Within this framework:
  - Prepares AIA's Sustainability Reporting Editions, including the Integrated Financial & Non-Financial Report in accordance with the prevailing reporting practices and ensures their communication is in line with Corporate Communication Standards and Practices,
  - Acts as AIA's representative in the Annual Assurance Process of the CSRD Statement/Report, as imposed by the current legal framework and prominent business practice and communicates the resulting Assurance Management Report to the Senior Management for validation, and
  - Informs and updates the Board of Directors Audit Committee, on a regular basis (at least annually) and as requested, regarding the ESG reporting landscape and its implications for the Company. Provides updates on sustainability-related issues and initiatives, and reports on the external sustainability assurance process and related results.
- Acts as the focal point for all sustainability-related communications and actions both internally and externally.

#### Furthermore:

- Communicates with sustainability governance bodies and represents the Company in all sustainability-related matters,
- Engages in networking activities and exchanges knowledge with third parties, undertakes benchmarking exercises, and takes all appropriate actions to ensure AIA's contemporary approach to sustainability, and
- o Proposes, coordinates or contributes to the implementation of sustainability-related programmes and actions, such as social contribution and corporate volunteering actions.
- Updates the Sustainability Policy as deemed appropriate, in cooperation with the members of the Sustainability Committee, and recommends ESG-related amendments to other corporate policies as necessary.

#### > The **SPR Department**:

• Collects and processes accordingly the reported, by the internal & external Stakeholders, information



to ensure their disclosure in the corporate sustainability publications in alignment with the ESG regulatory framework and best practices,

- Contributes to the dissemination of the Sustainability Strategic Vision and ESG-related principles across the Company,
- · Raises awareness and mobilizes the employees for sustainability-related initiatives,
- Addresses areas that require improved sustainability-related performance per applicable standards, law and beyond,
- Formulates and contributes to achieving AIA's sustainability mission and goals, and
- Continuously enhances communication with the Stakeholders, as deemed necessary by AIA's
  Management to ensure they are apprised of the Company's priorities in the field of sustainable
  development.

#### > The **Management** is responsible for:

- Integrating and abiding by the overall ESG approach of AIA in the areas of their responsibility and engagement,
- Ensuring compliance with the legal framework, standards, requirements, priorities, and trends related to Sustainability,
- Implementing agreed sustainability programmes, initiatives, and actions that stem from targeted corporate processes/ procedures (e.g., Materiality Analysis),
- Providing SPR with sustainability-related data, as requested, for the corporate sustainability
  publications and efficiently and effectively respond to emerging sustainability-related requirements
  in areas of their expertise and accountability (e.g., ESG transformation of AIA's procurement
  framework),
- Ensuring that employees within their area of responsibility understand and align with the provisions
  of this policy.

## 6. Sustainability Strategic Planning

Taking into consideration the emerging ESG regulatory framework, as well as AIA's ESG Commitments and Priorities, as depicted in the Corporate Sustainability Vision, SPR is responsible for the Corporate Sustainability Strategic approach roll out in collaboration with all AIA competent Departments. Additionally, SPR oversees the sustainability-related disclosures of the Company and, as such, sets the timeplan for the materiality analysis and data collection on an annual basis. The timeplan is approved by the CSO and is duly communicated to the Sustainability Committee members. SPR seeks advice and guidance from CMA to effectively communicate AIA's ESG priorities and initiatives to various stakeholder groups. These groups are identified by the Sustainability Committee and, as needed, other relevant corporate Departments.

#### **6.1. Materiality Analysis**

Materiality Analysis is a process used to identify and evaluate the most significant environmental, social, and governance (ESG) issues that could impact an organization's performance and stakeholder decisions. This



analysis helps prioritize these issues based on their relevance and importance to both the Company and its Stakeholders, ensuring that the organization focuses on the most critical areas for sustainable development and strategic decision-making. Materiality Analysis is based on internationally accepted ESG Reporting Frameworks and Standards as well as EU and/or National guidelines.

The Sustainability Committee convenes on an annual basis for acknowledging and reviewing AIA's top Material Topics. The steps followed for the Materiality Analysis are the following:

- SPR initiates the process and prepares the list of a wide range of material topics, based on previous year's exercise updated to incorporate sectoral emerging trends, external environment, and peer benchmarking analysis output,
- The Sustainability Committee, chaired by the Head, Sustainability and Industry Affairs, discusses all
  material topics and finalizes the list,
- SPR, in conjunction with the engaged Independent Assurance Provider defines the methodology that is
  essential to be followed during the Materiality Analysis (e.g., questionnaires, interviews, focus groups),
   Each member of the Sustainability Committee (SPR, CMA, HRE, ABU, ENC, FSD, CBU, PRC and ENA)
   prioritizes the topics most material to AIA, from a financial perspective and impact on the ESG aspects of the
   Company's operation, as they have emerged during the multiple engagement instances (workshops, special

The Head, Sustainability and Industry Affairs selects representatives of the Airport Community
 Stakeholders to participate in the Materiality Analysis, the contact details of whom are updated by SPR on an annual basis,

- SPR updates the Stakeholders map,
- SPR contacts the selected Airport Community external Stakeholders for their materiality input, and, within this framework, initiates an ESG-focused exchange with AIA value chain's representatives and
- SPR records and analyses the feedback received from each stakeholder group, compiles the results of the analysis on a Materiality Map and communicates the results to the Sustainability Committee and to the CSO for review and validation.
- SPR ensures the top material topics are included within AIA's Sustainability-related Reports and Publications and, per the applicable Reporting Standards, highlights the KPIs that need to be disclosed per material issue.

#### 6.2. Sustainability Strategic Planning

Sustainability strategic planning involves integrating the top material topics identified from the Materiality Analysis (par. 6.1) into the Company's governance, strategy, planning, and reporting. Annually, SPR, in collaboration with the Sustainability Committee, defines the impacts, objectives, procedures, policies, and actions. This process considers current and anticipated economic, social, and environmental developments (e.g., regulations, and global, regional, and national priorities and challenges), as well as the topics identified in the Materiality Analysis.

The implementation of the resulting actions and initiatives falls under the responsibility of the designated



#### departmental teams:

- SPR initiates the process(es) and prepares a list of Material Topics, that emerge from the Materiality Analysis that is being performed on an annual basis and
- The Head, Sustainability and Industry Affairs, Chair of the Sustainability Committee, seeks final review by the CSO and relevant approval by the CEO.

## 7. Sustainability Reporting

The Annual & Sustainability Report (ASR) consists of financial and operational data, sustainability commitments, objectives, targets and actions, management practices and key performance indicators, presented in a structure adherent to the applicable Standards.

The responsibility for preparing, submitting, and distributing the corporate sustainability-related reports lies with AIA's Sustainability Strategic Planning & Reporting Department, which coordinates the input collection from the competent AIA Departments under the supervision of the CSO, who in turn reports to the CEO and duly keeps the Chief Officers apprised. The structure of the Report's content is shaped in line with applicable standards and guidelines, as well as best market practices as verified by benchmarking studies (par.7.1) performed by SPR.

AIA's Annual & Sustainability Report adheres to the most current Global Reporting Initiative (GRI) Standards, the AA1000 Accountability Principles (2018), and the ACI EUROPE's Guidelines for a Sustainability Strategy for Airports (SSA). Starting in 2025, the report will also comply with the European Sustainability Reporting Standards (ESRS) as introduced by the Corporate Sustainability Reporting Directive (CSRD), covering AIA's financial and non-financial performance for the fiscal year 2024.

Additionally, the report reflects the Ten Principles of the United Nations Global Compact (UNGC) and is aligned with the United Nations Sustainable Development Goals (UN SDGs), highlighting the Company's efforts to address global challenges.

#### 7.1. Sustainability Assurance

AIA undergoes independent assurance of its non-financial disclosures, ensuring they meet principles of accuracy, completeness, and adherence to relevant standards. The assurance provider also conducts a benchmarking study against selected airport companies to confirm that AIA's approach is both contemporary and industry specific.

The results of this assurance process, including the Assurance Statement from the independent provider, are included in the corporate sustainability report, in accordance with the CSRD requirements imposed by the EU ESG regulatory framework.

#### 7.2. BoD Overview

The Board of Directors fulfils a supervisory role regarding the Company's Sustainability Reporting, as provided by the Audit Committee Charter.



## 8. ESG Vision & Strategic Priorities per area

AIA aims to be a low carbon frontrunner in the aviation industry and in Greece, contributing to the prosperity of our region, and incorporating people and the environment at the heart of our processes & decision making, all the time setting standards that go beyond compliance, and has defined a set of priority areas where it can play a distinctive role while considering its Stakeholders' views.

#### 8.1. Environment

AIA has in place a comprehensive environmental management system which consists of concrete programmes, both inside and outside the airport perimeter, and is on track to reach its ambitious targets set for the near future, including reaching net-zero carbon emissions. Beyond its net zero goal, AIA aims to reduce Scope 3 emissions by supporting Stakeholders in their decarbonization process.

Furthermore, besides decarbonization, AIA's main environmental initiatives focus on the following areas. Indicatively:

- Biodiversity monitoring,
- Resource use efficiency,
- Reduction of pollution and waste, and
- Noise pollution monitoring.

#### 8.2. Social

AIA envisions turning the city of Athens into a sustainable year-round destination, while creating a welcoming and supportive environment for both employees and customers.

#### Focus areas:

- Employee satisfaction: invest in employees wellbeing and development,
- Customer experience: unique and high quality, and
- Community impact: build Athens as a sustainable year-round destination, and further develop the existing diverse Cultural Programme.

AIA actively contributes to the economic development of the city, the region, and the country, through its targeted actions oriented towards sustainable tourism development.

#### 8.3. Governance

Sustainability is embedded in the Company's business strategy, values and vision. AIA commits to leading sustainability standards, including the Global Reporting Initiative (GRI) and the European Sustainability Reporting Standards (ESRS), and integrates these standards into its daily operations. The Company prioritizes continuous and genuine engagement with both internal and external Stakeholders.

#### Focus Areas:

- Establishment of a systematic approach for Sustainability Strategic Planning and Reporting,
- Stakeholder engagement: development of further enhanced communication strategy, and
- Integrating sustainability criteria to ensure financial stability and resilience.



## 9. Stakeholders Engagement

AIA identifies the Stakeholders, who impact and/or are significantly impacted by its activity, while establishes a two-way effective communication, encouraging active and substantive participation in line with the globally acknowledged Principles of the "AA1000 Accountability Principles", namely the Principles of Inclusivity, Materiality, Responsiveness, and Impact.

## 10. Networking and Initiatives

AIA, as member of Business Associations, at both the national and international level, is actively engaged in sustainable business practices, participates and, in certain cases, organizes targeted sustainability-oriented lobbying, advocacy, and networking initiatives. Through such engagement, AIA actively participates in shaping the ESG regulatory framework towards best representing the Company's interests, openly communicates with other interested parties to identify and develop initiatives and/or best market practices, to benchmark, further develop, as well as enrich its sustainability activities and strategic approach.

## 11. Linked-processes

- Code of Business Conduct HRE-020301-PL
- Code of Relations with Business Partners POLICY-CEO005
- Audit Committee Charter BOD-010201-CH
- Whistleblowing Policy PL-CEO011
- Risk Management Policy COC-010201-PL
- Corporate Risk & Control Charter COC-010101-CH
- Energy Related Risks and Opportunities TES-050302-XP
- Environmental Policy POLICY-CEO004
- Corporate Compliance Policy DPC-020101-PL
- Sponsorships & Donation Policy POLICY-CMA001
- Procurement Policy & Framework POLICY-PRC001
- Energy Policy POLICY-TES001
- Biodiversity Preservation ENC-060101-OP
- Environmental Management System ENC-050101-OP
- Environmental Guidelines for Construction Activities to Third Parties in Athens International Airport GUIDELINE-ENCO01
- Energy Planning and Performance Measurement TES-050201-CP
- Training & Development Manual HRE-010101-CP
- Training policy for the Members of the Board of Directors and Senior Executives BOD-010103-PL
- Remuneration Policy for the Members of the Board of Directors BOD-010602-PL
- Compensation Policy HRE-020101-CP



## 12. Changes from previous version

The Policy has been revised as to present the updated roles and responsibilities, in line with the provisions of L. 4706/2020 and the contemporary sustainability standards and guidelines for the Company's ESG framework.

## 13. Approval and Review

The Policy has been approved by the Board of Directors of the Company by virtue of resolution dated 30.11.2023 and has become effective on 07.02.2024.