



Environmental Policy

BoD Decision No. 36/20.09.2024

INDEPENDENT POWER TRANSMISSION OPERATOR

July 2024

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1 Framework

The role of IPTO ("the Company", "the Operator") is pivotal for the promotion of sustainable development in Greece, as through its activities it contributes to the country's energy transition, the improvement of energy safety and the resilience of infrastructure in the context of changing economic and climate conditions.

At the same time, environmental concern constitutes an important pillar of the Operator's strategy. In this direction, IPTO sets goals for the reduction of the potential impact on the environment and biodiversity, resulting from its activity.

The configuration of the Environmental Policy creates a single framework of principles for improving environmental performance of IPTO and the companies of the IPTO Group, and the adoption of sustainability principles in decision-making throughout the scope of its activity. Moreover, the Policy meets the requirements of third parties (shareholders, financial sector, reinsurers, local communities) for comprehensive non-financial information.

The protection of the environment is not only a legal requirement, but also an important element of the reputation of any responsible business. For this reason, IPTO focuses on addressing key environmental issues and opportunities, aiming at the minimization of its environmental impact.

2 Purpose and scope

The purpose of the Policy is to establish specific principles and measures for the implementation of IPTO's corporate obligations regarding the protection of the environment, and to meet both the needs and expectations of various stakeholders.

The Environmental Policy creates a framework for the improvement of environmental performance of the Company, ensures the sustainability of infrastructure and services, and achieves its full legislative compliance.

The Environmental Policy is completely interrelated with the Company's values of transparency, efficiency and sustainability and aims to form a strong corporate culture on environmental management issues.

Its scope extends to all the activities of the IPTO Group companies and binds all their personnel at all levels of the hierarchy, as well as third parties that cooperate with or contract with the Group Companies, on the targets, principles and measures described in the following sections.

3 Commitments

In the context of the alignment of the Independent Power Transmission Operator with the requirements reflected in national (e.g., [National Energy and Climate Plan](#)) or Community objectives ([EU Green Deal](#)), and also driven by the will to continuously improve its environmental performance, to ensure the sustainability of its operation and the observance of agreements beyond its legal obligations, IPTO commits to the following:

- ✓ to comply with the national and European legislation, the regulations and standards applicable to the Company's activities and facilities, as well as with voluntary commitments based on best practices and innovations
- ✓ to enhance its contribution to climate change mitigation and the country's energy transition towards a carbon-neutral Europe by reducing CO₂ emissions in its activities
- ✓ to make responsible use of energy, by improving energy efficiency and energy savings, as well as monitoring of its performance through predefined key performance indicators (KPIs) per Department and overall, for the whole Company
- ✓ to adopt the principle of prevention and the gradual creation of an appropriate environmental management system (e.g., ISO 14001: 2015), aligned with the requirements of international standards and adapted to the specificities of the organization
- ✓ to disclose its environmental performance and to assess the risks and opportunities related to climate change (Environmental Management and Performance Assessment, which should be carried out for all the important aspects of IPTO's activity)
- ✓ to address the risks and challenges arising from climate change, so as to adapt IPTO's fixed assets and productive activities to the impacts of climate change, by developing and implementing the necessary preventive measures and appropriate action plans that enhance resilience
- ✓ to create a methodology for recording and monitoring of direct and indirect GHG (Greenhouse Gas) emissions, as a part of actions that reduce the carbon footprint. The goal is to establish medium- and long-term emission reduction targets throughout the value chain

- ✓ to apply sustainability principles to the design and construction of new infrastructure/facilities, as well as to the upgrade of existing infrastructure/facilities or the maintenance of the Hellenic Electricity Transmission System (HETS). The goal is to mitigate the Company's environmental footprint (e.g. projects for the prevention or restoration of the affected environment following the completion of the works) and to contribute to natural habitats protection

- ✓ to preserve and protect biodiversity (e.g., avifauna, Posidonia) and the natural capital of the country, through recommendations for setting pertinent targets and actions

- ✓ to make sustainable use of and protect water and marine resources

- ✓ to establish a uniform and digitized waste monitoring and management system

- ✓ to adapt the Company's goals, to carry out periodic measurements (e.g., electromagnetic radiation and noise), to publish these measurements and to upload all the required data on the electronic platforms of the Ministry of Environment (HMA, F-Gases & ODS), in the context of monitoring environmental performance and alignment with both domestic and international requirements

- ✓ to adopt circular economy criteria in the Company's activities for the rational use of available resources (e.g. gradual adoption of green public procurement/ design of contractor assignment procedures based on the life cycle cost of goods, services or projects apart from the total cost, so as to avoid negative environmental impacts and waste generation) based on the principles of sustainable development

- ✓ to strengthen environmental criteria in key Company procedures such as the supply chain, projects investments

- ✓ to take initiatives and establish rated evaluation criteria in as many tenders as possible so as to encourage potential suppliers/contractors to adopt an environmentally responsible attitude to contribute to technological progress, to harness and promote innovation (e.g. new technologies in monitoring systems and equipment) aiming at the design and adoption of solutions and new ways of operating so as to avoid or minimize the environmental impacts of IPTO's activities

- ✓ to encourage a culture of environmental respect through appropriate personnel awareness activities and training programmes, when deemed necessary

- ✓ to develop and maintain effective communication channels for public briefing (e.g., safe limits of electromagnetic fields), participation in dialogue and the conclusion of partnerships/useful initiatives, between different groups of stakeholders (local communities, research bodies, investors, etc.) for common value creation with regard to the environment and its protection

- ✓ to take initiatives based on the needs of local communities affected by natural disasters, contributing as appropriate

- ✓ to establish comprehensive procedures for reporting and investigating environmental incidents, in accordance with measures 11 and 12 of the Occupational Health and Safety Policy, which will include preventive/corrective actions.

4 Roles

The Environmental Policy was drafted by the Environmental, Social and Corporate Governance Branch, which is responsible for its monitoring and implementation.

Moreover, the Board of Directors of IPTO, in addition to approving the policy, exercises a leading role in the fulfillment of the commitments mentioned by taking all kinds of measures aimed at:

- the alignment of the Company's strategy with the policy guidelines,
- the training, motivation, guidance and support of the personnel with a view to actively contributing to the achievement of the policy purpose,
- the promotion of collaborations and partnerships with organizations/bodies dealing with environmental protection,
- the allocation of adequate and appropriate resources for the implementation of the measures described.

The obligation to comply with the requirements of the applicable environmental legislation and the corresponding rules, as recorded in this policy, is borne by all the employees of the IPTO Group, as well as by the interested parties that cooperate with the Company (e.g. joint ventures, partners, suppliers, contractors).

5 Dissemination of information

The Policy is communicated and made available to all parties involved within and outside the organization through the available communication channels, to further disseminate and promote the positions of the Operator on issues related to its environmental management.

Detailed information on the Company's actions related to the commitments arising from its Environmental Policy is included in the annual Sustainable Development Report and is available on the corporate website.

6 Policy revision

The Policy is approved by the Board of Directors of the Company and is revised every two years, unless it is deemed appropriate to do so earlier, following a proposal for its amendment by the Environmental, Social and Corporate Governance Branch, and following a legal audit by the Legal Department.

The first version of the Environmental Policy was approved by the Board of Directors of IPTO S.A. on 20.09.2024, which is also the date of its entry into force.

7 Contact point

Questions regarding the content and implementation of the Environmental Policy may be addressed to the Environmental, Social and Corporate Governance Branch (email: sustainability@admie.gr).