

policy on gender equality, inclusion & diversity

**BoD Decision No.
37/29.11.2023**

INDEPENDENT POWER
TRANSMISSION OPERATOR

09/2023

Table of Contents

01 Objectives 04

02 Scope 05

03 Framework 06

04 Basic Principles 07



05 Implementation Guidelines 10

06 Measures for the implementation of the present policy 11

07 Incident Reporting 13

08 Policy Management & Updating 13

01 Objectives



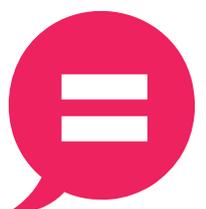
The Policy on Gender Equality, Inclusion and Diversity (hereinafter referred to as the “Policy”) of the Independent Power Transmission Operator (hereinafter referred to as the “Company” or “IPTO”) seeks to shape a corporate culture and create an environment that supports diversity, equality, and inclusion, by enhancing equal opportunities and non-discrimination. This is achieved through the adoption of a governance model that is committed to the promotion of equality and the prevention against all forms of discrimination on any ground such as gender, race, color, national or ethnic origin, descent, religious, political or other beliefs, disability or chronic disease, age, family or social status, sexual orientation, identity or gender characteristics, in all structures and operations of the Company without exception.

The Company acknowledges the necessity for the adoption of the best practices for the shaping of a workplace with characteristics of diversity, equality and inclusion and intends to take specific initiatives for the elimination of any practices that create and maintain gender inequalities or other forms of discrimination.

The present Policy includes the objectives, the basic principles, the scope and the guidelines for the promotion of diversity, substantive equality and the inclusion of the persons employed by the Company and its subsidiaries/ affiliates, regardless of the employment relationship, including those employed under contracts of employment, works, independent services, salaried mandates, those employed through third party service providers, as well as persons attending training programs: trainees and apprentices (hereinafter referred to as the “Human Resources”).

The Policy is available on the Company’s website
<https://www.admie.gr/>.

This Policy is the result of a) the effort of the working group for the editing, formulation and drafting of the IPTO policy on gender equality and the inclusion of diversity, and b) the conclusions of the internal quantitative and qualitative research conducted by IPTO during November and December of 2022.



02 Scope



The present Policy applies to all IPTO personnel regardless of their contractual status, including the members of the management, the executives and those employed under an employment contract, a works contract, a contract for independent services, a salaried mandate contract, those employed through third party service providers, as well as persons attending a training program, including trainees and apprentices.

The Policy is in line with national and European laws as well as the Sustainable Development Goals (SDGs) of the United Nations 2030 Agenda. In implementation of the Policy, IPTO complies with the Greek and European legislation as well as the Greek and European regulatory framework.

This Policy should be interpreted in conjunction with the Policy on the Prevention & Combating of Workplace Violence and Harassment & Management of Internal Complaints.



03

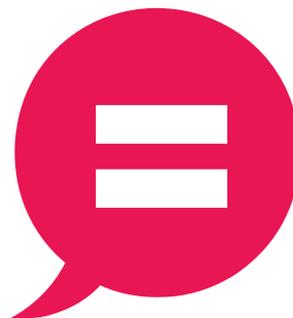


Framework

Diversity: The concept of diversity encompasses the set of characteristics that make people unique and special, that is, the wealth that each person contributes because of his or her diversity, including his or her visible and invisible characteristics. IPTO acknowledges the value that people with different backgrounds, points of view and experiences can add to the Company, regardless of age, potential disability, nationality/citizenship/race, gender identity, gender expression, family and social status, pregnancy, maternity, sexual orientation, social and economic background, religious, political, or spiritual beliefs.

Equality: Equal opportunities are one of the pillars of professional progress, which is based on equal treatment of the human resources within an organization. IPTO provides all employees with equal opportunities in order for them to succeed and evolve professionally.

Inclusion: inclusion refers to the way in which differences between individuals are assessed and opportunities are created so that everyone can reach their full potential. It constitutes a strategy that focuses on the development of corporate structures, systems and procedures and a corporate culture that respects the individual characteristics of all people within an organization, while promoting a sense of belonging, which makes individuals feel valued and part of a group or community. In particular, the inclusion of diversity is a prerequisite for equal treatment as it seeks to eliminate stereotypical perceptions and cultural prejudices, based on which specific social groups and individuals are treated. IPTO welcomes and encourages behaviors that recognize, understand, and appreciate the differences between people, promote authenticity and contribute to the consolidation of a strong sense of belonging and inclusion.



04 Basic Principles

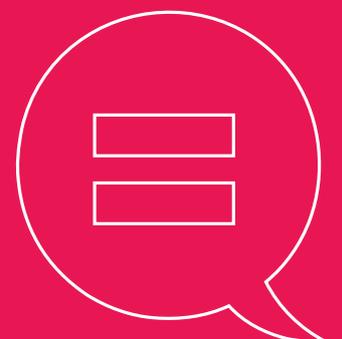
This section describes the basic principles that should govern the working environment of IPTO regarding the professional career and career prospects, the procedures for the promotion to positions of responsibility, the salary issues, and the reconciliation of family and professional life for the human resources of the organization, to strengthen the culture of Diversity, Equality and Inclusion.

The basic principles adopted and promoted by IPTO are the following:

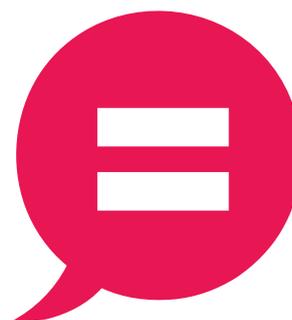
- ▶ Ensuring the quality of employment as a fundamental means of promoting equal opportunities and the prohibition of discrimination of any kind, as well as respect for diversity in the workplace.
- ▶ Ensuring that promotion, selection, and recruitment procedures are based on neutral, fair, and objective standards/criteria of merit and competency.
- ▶ Provision for the establishment of special arrangements for the integration of people with less easy access to the labor market and elimination of standards that are detrimental to the diversity and equality of individuals from all business actions and decisions.
- ▶ Promotion of gender equality within IPTO, in accordance with the applicable legislation and following the best international practices, as well as the relevant provisions of the fifth Sustainable Development Goal (SDGs) approved by the United Nations (Gender Equality).
- ▶ Elimination of any obstacles that may hinder or limit a career on grounds of gender or other forms of discrimination.
- ▶ Ensuring of equal remuneration for work of equal value for all.
- ▶ Provision of education and training for all Employees as regards the knowledge and skills required for the proper performance of their work, their professional development, and the provision of equal opportunities.



- ▶ Support of the employees with different abilities, by promoting their effective employment.
- ▶ Promotion of gender equality and the inclusion of diversity in governing and consultation bodies, by encouraging the participation of the under-represented gender.
- ▶ Creation of a work environment based on mutual respect and tolerance, especially towards vulnerable groups and individuals, while encouraging cooperation, communication, and freedom of expression.
- ▶ Avoidance of any practice that opposes gender equality and leads to the exclusion of individuals due to their characteristics (ethnicity, religion, gender identity, age, sexual orientation).
- ▶ Support of persons with disabilities and chronic diseases.
- ▶ Zero tolerance for incidents of discrimination, mental or other forms of harassment, intimidation, or victimization of any kind. Harassment on the grounds of discrimination may be verbal, written, or physical, or take the form of aggressive, derogatory, or dismissive behavior towards someone on grounds of age, disability, ethnic origin, sex, or gender choice, marital or social status, pregnancy or maternity, sexual orientation, social and economic background, religious or other beliefs.
- ▶ Creation of a work environment within which each employee may pursue their individual development, regardless of their sexual orientation, gender, age, civil or marital status.
- ▶ Conduct of training, awareness, and empowerment programs in cooperation with educational institutions in order to strengthen the values of Diversity, Equality and Inclusion in IPTO and encouragement of the participation of the under-represented gender in career and training programs related to IPTO's activities, where the participation of one of the two genders is significantly lower than the other.



- ▶ Combating and prevention of workplace violence and harassment through the establishment of a relevant policy and an internal complaints management mechanism. Protection and support of victims of gender-based or other forms of violence.
- ▶ Development of a sense of belonging to the Company by seeking to ensure that all employees are considered part of the business and its role in the local, national, and international community. In this way, the employees consider the Company's values, principles, and objectives as their own and their contribution to them is perceived as a key component not only of their professional but also of their personal development.
- ▶ Acknowledgement of the coexistence of different generations as a source of continuous enrichment for Human Resources, due to the different skills and approaches of the generations, and as an important contribution to the adaptation of the services provided by the Company to the needs of the communities, where it operates.
- ▶ Taking into account that certain disabilities in physical and/or mental capacities, which could constitute an obstacle to the performance of certain tasks, in fact represent significant added value in other tasks.
- ▶ Adoption of the use of inclusive language in all types of internal and external corporate communication and, in any case, elimination of the use of discriminatory language.
- ▶ Ensuring that the design and/or implementation of the procedures, in which Artificial Intelligence is used, and the algorithms used, do not include prejudices that violate the objectives and principles of this Policy.



05 Implementation Guidelines



IPTO incorporates in all aspects of its operation and the policies it implements the principle of non-discrimination mainstreaming, which is defined as the systematic integration of the principle of non-discrimination and the provision of equal opportunities at all stages of the operation of an organization and its policy-making. In order to achieve the objectives, set out in the present Policy, the Environmental, Social and Corporate Governance Branch, which is under the Human Resources and Legal Issues Division, assumes the following responsibilities:

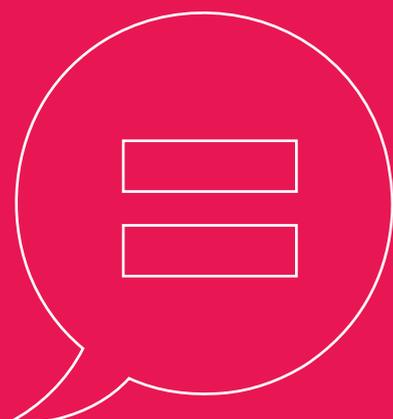
- ▶ Monitoring of the implementation of the Policy and the objectives it sets within the required timeframes and preparation of reports for the assessment of the current situation within the Company regarding the achievement of the objectives of the present and the effectiveness of the measures and actions taken.
- ▶ Preparation of an Action Plan for the promotion of improvement actions, where necessary, and the development of appropriate - quantitative and qualitative - methods for the monitoring of the status of equality and inclusion of the diversity achieved within the Company (e.g., collection of statistics, comparison, completion of anonymous questionnaires by the employees). Personal data protection issues should be taken into account when collecting the data required for such monitoring.
- ▶ Cooperation with organizations or other bodies with the aim of promoting equality and eliminating discrimination on the grounds of sex, race, color, national or ethnic origin, descent, religious, political, or other beliefs, disability or chronic disease, age, family or social status, sexual orientation, identity, or gender characteristics.
- ▶ Promotion and adoption of the Policy objectives by the entire Management.

06 Measures for the implementation of the present Policy



The Company, in accordance with its obligations under the applicable legislation and the objectives and basic principles of this Policy, takes all necessary measures to prevent, control, reduce and address inequalities on the grounds of gender or diversity, in the following ways:

1. By incorporating the objectives and basic principles of this Policy into the introductory seminar for new entrants.
2. By posting the Gender Equality, Diversity and Inclusion Policy on the Company's official records and website.
3. By organizing information campaigns to raise personnel awareness and by encouraging open communication with the Company's Management and direct supervisors on issues of employee equality, prevention of violence and harassment at work.
4. By informing young parents, persons with disabilities or chronic diseases, regardless of gender, of their rights and obligations under the law.



5.

By conducting training programs for all senior executives in order for them to contribute to the implementation of this policy in their Division, Department or Branch, that integrate equality and inclusion for the tackling of discrimination, of the impact of stereotypes on everyday work and the abusive behaviors in the working environment.

6.

By harmonizing the content and language of the Personnel Rulebook and all administrative documents with this Policy.

7.

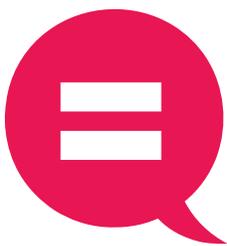
By implementing a reporting mechanism for incidents that violate human rights and by dealing with such incidents confidentially, in accordance with the Policy on the Prevention & Combating of Workplace Violence and Harassment.

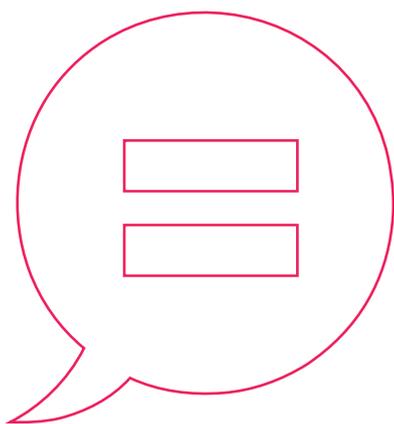
8.

By improving the accessibility to the infrastructure and services for people with disabilities.

9.

By taking initiatives for the attraction of women or men to fields of the company that are under-represented.





07 Incident Reporting



In the event of a concern regarding this Policy or any complaint, the employee should report the incident immediately in accordance with what is detailed in the Policy on the Prevention & Combating of Workplace Violence and Harassment, which includes the mechanism for the management and handling of internal complaints.

08 Policy Management & Updating



The Policy is approved by the Board of Directors of the Company and is revised by its decision, if deemed appropriate, following a relevant proposal for amendment by the Legal Department and the Environmental, Social and Corporate Governance Branch.

