



Human Rights Policy

1. Definitions

- 1.1 “Company” shall mean the company “ELLAKTOR SA”.
- 1.2 “Group” shall mean the holding group of the company “ELLAKTOR SA”, that is, the Company and the companies it controls (“subsidiaries” or “subsidiary companies”).
- 1.3 “Suppliers” shall mean the Group’s suppliers, partners and subcontractors.
- 1.4 “Policy” shall mean the Human Rights Policy.

2. Scope

- 2.1 This Policy applies to all Group’s companies, including those based abroad.
- 2.2 This Policy is binding for (i) the members of the Board of Directors (BoD), (ii) the people who exercise managerial duties in the Group’s companies, and (iii) all other employees of the Group.
- 2.3 This policy is mandatory for all suppliers cooperating with the Group and its companies.
- 2.4 When a Group company participates in a Joint Venture which is not controlled by the Group and / or in companies with a share (both direct and indirect) less than 100%, partners are informed about this Policy and are urged to comply with its requirements and adopt equivalent policies, if they have not already done so.

3. Purpose and basic Principles

- 3.1 The purpose of this Policy is to ensure the human rights of Group’s employees, suppliers’ employees, as well as of the local communities where the Group operates.
- 3.2 The respect for human rights is a fundamental principle of ELLAKTOR Group. This policy is based on the principles of the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, as well as the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO 87 and ILO 98).
- 3.3 As a principle, where the national legislation and international human rights standards differ, the Group mandate is that the strictest standard is applied. In cases where the national law conflicts with international standards, the aim of the Group shall be to seek ways to comply with the international standards to the maximum possible extent, while complying with the national law.
- 3.4 In cases where a human rights violation is identified, the Group commits to take immediate corrective actions and to remove any consequences due to this violation.
- 3.5 The implementation of the Human Rights Policy is monitored by the Group’s Board of Directors.

4. Working Conditions

4.1 Remuneration

- 4.1.1 The Group respects the national legislation, in the countries where it operates and where it exists, regarding minimum wage.
- 4.1.2 The remuneration offered by the Group is in full compliance with all applicable laws and industry standards, while is determined based on objective criteria.
- 4.1.3 Employees shall receive equal pay for equal work, regardless of race, sex, skin color, nationality or ethnic origin, social class, religion, age, disability, marital status, sexual orientation or gender identity, political or cultural beliefs.
- 4.1.4 The Group ensures that employees are paid on time and on a regular basis, directly to their personal bank accounts.
- 4.1.5 Employees have access to their pay slip, where the calculation of the monthly salary is clear, including overtime, benefits and legal deductions.

- 4.1.6 All forms of illegal work are expressly prohibited.
- 4.1.7 The Group complies with the national legislation, where it exists, regarding the compensation of the employee, in case of dismissal or resignation.

4.2 Recruitment

- 4.2.1 Employees, prior to their commencement of cooperation with the Group, are informed about the terms and conditions of their work as well as about their rights and obligations, according to the national legislation, in the language they understand. They receive a signed copy of the original employment offer in the language they understand, as well as their employment contract, which should not differ, in any event, from the original offer.

4.3 Working Hours

- 4.3.1 The Group fully complies with the applicable laws on working hours and overtime, even in the case that an employee may request to work additional hours.
- 4.3.2 The Group respects the right of employees to rest and ensures that all employees are away from work at least 1 day a week.
- 4.3.3 Employees have access to appropriate rest areas, which they can use while taking their breaks, during working hours.
- 4.3.4 The rules regarding working hours, as well as the legal breaks, are communicated to the employees in a clear way during their recruitment and also during their employment and can be changed only after a mutual agreement between the employee and the Group, when this is possible.

4.4 Leave and other benefits

- 4.4.1 The Group complies with the requirements of labor law, regarding leaves (e.g. maternal / parental leave, annual leave, marriage leave, etc.). In addition, the Group extends the provision of legal leave, to all its employees, regardless of employment relationship.
- 4.4.2 The Group provides a group life insurance program to its employees (with the exception of hourly-paid, part-time workers who are employed occasionally in Group projects or operational units).

4.5 Right of association and collective bargaining

- 4.5.1 The Group complies with legal requirements, regarding the right of association and collective bargaining.
- 4.5.2 The Group ensures that employees who participate in trade unions do not face any kind of intimidation or harassment. The Group is committed to developing a constructive dialogue with the legally elected employees' representatives, in mutual respect and good faith.
- 4.5.3 Should in any of the countries where the Group operates, the creation of a trade union as well as collective bargaining is prohibited by law, Group will facilitate the dialogue between Management and employees.

4.6 Forced Labour

- 4.6.1 The Group prohibits the use of any form of forced labor, including prison labour, bonded labor, modern forms of slavery and any form of human trafficking.
- 4.6.2 The Group in no case retains personal travel documents or identity documents or any other personal items. The original documents of the employee are used by the Group, only if this is required for registration with local or national authorities. At the end of the process, the relevant documents are returned to the employees.
- 4.6.3 Employees have the freedom to terminate their contract unilaterally (after timely notice) at any time they wish without incurring any costs.
- 4.6.4 The Group ensures that employees have contracts in a language they understand and that all terms and conditions are adequately communicated to the employees.

4.7 Child Labour

- 4.7.1 The Group does not employ children below the minimum age limit, applicable by the legislation in the countries where it operates, which in any case cannot not under 15 years.
- 4.7.2 The Group does not employ children below the age limit of compulsory education, in the countries that operates.
- 4.7.3 The Group does not employ people under the age of 18 to work in hazardous environments (such as underwater or underground work, work at height, in confined space, etc.) or night work or work that is not compatible with the development of the employee.

4.8 Diversity

- 4.8.1 The Group provides equal opportunities during the recruitment, as well as the development and training of employees. No discrimination based on race, sex, skin color, nationality or ethnic origin, social class, religion, age, disability, marital status, sexual orientation or gender identity, political or cultural beliefs or any other situation protected by applicable law, is tolerated.
- 4.8.2 The Group does not tolerate any form of physical, verbal, sexual or psychological harassment or violence, as well as threats and intimidation at work.
- 4.8.3 The Group is committed to develop a program to promote diversity in the workplace and to raise awareness among employees about discrimination.

4.9 Health and Safety

- 4.9.1 The Group has an Occupational Health and Safety Policy which covers all employees working in its projects and activities, as well as the employees of its suppliers, partners, and subcontractors.
- 4.9.2 Before starting work, all employees are informed about the basic health and safety rules, as well as the risks and safety measures that relate to their work.
- 4.9.3 All employees receive systematic updates on occupational health and safety issues.
- 4.9.4 All employees are provided with the appropriate Personal Protective Equipment for their work.
- 4.9.5 All employees have access to adequate rest, hygiene and First Aid areas.
- 4.9.6 The Group applies procedures for reporting and monitoring occupational accidents and diseases, that are also relevant to the employees of its suppliers, partners and subcontractors.

4.10 Living Conditions

- 4.10.1 The accommodation facilities, when provided to the employees by the Group, meet the rules of health and safety, and satisfy the basic needs of the employees for personal space and privacy.
- 4.10.2 When required, appropriate medical care as well as the appropriate conditions that allow employees to practice their religion, are provided in the accommodation facilities.
- 4.10.3 Food provided by the Group in accommodation facilities, complies with the necessary recommendations to ensure the health and efficiency of the employees (WHO 2004 global strategy on diet), and includes appropriate choices that respect the religious beliefs of the residents.

4.11 Personal Data Protection

- 4.11.1 ELLAKTOR Group takes all appropriate technical and organizational measures in order to ensure (a) the confidentiality, security and protection of employees personal data and prevent their alteration, damage, loss, destruction as well as their accessibility by unauthorized third parties, and (b) the effective exercise of their rights against the processing of employees' personal data, in accordance with the provisions of the General Data Protection Regulation (EU) 2016/679 and the Group's Data Protection Policy.

4.12 Physical security of facilities and employees

- 4.12.1 The Group employs specialized employees and utilizes security services to ensure the integrity and security of its employees and facilities, from internal and external threats, while ensuring respect for the privacy and dignity of employees, including the employees of its suppliers, partners and subcontractors.
- 4.12.2 The Group is committed to comply with the Voluntary Principles on Security and Human Rights (UN Voluntary Principles on Security and Human Rights) and ensures that employees working in this field are informed and support the voluntary principles.

5. Local Community

- 5.1 The Group is committed to develop activities and implement projects that respect the rights of the local communities, in the areas where it operates.
- 5.2 The Group maintains an open line of communication with the local communities, in the areas where it operates and consults with the representatives of the local communities in relation to the prevention and mitigation of any impacts from its activities.

6. Suppliers

- 6.1 The acceptance and compliance of the Group's suppliers, partners and subcontractors with the principles and requirements of this policy, constitute their contractual obligation.

7. Violations Report

- 7.1 ELLAKTOR Group has developed a specific Whistleblowing process, which can be utilized by the Group's employees, suppliers, partners, and subcontractors, as well as the local community to report, in good faith, any violations of the Human Rights Policy. (<https://ellaktor.com/en/epitropi-kanonistikis-symmorfosis-kai-viosimis-anaptyxis/politiki-diacheirisis-anaforon-kai-kataggelion/>)

8. Training

- 8.1 The Group provides the necessary resources so that all employees, as well as the employees of suppliers, partners and subcontractors working in Group projects and activities, participate in annual training activities related to this Policy.

9. Monitoring and evaluation of the Policy

- 9.1 The Group utilizes the due diligence process as a means to identify and prevent situations that endanger the human rights of its employees, employees of its suppliers, partners and subcontractors and the local communities in which it operates, as well as in cases acquisitions or significant investments.
- 9.2 The Group evaluates and monitors the compliance of the Human Rights Policy in its activities, as well as the effectiveness of the Policy to safeguard the human and labour rights of the employees, the employees of the suppliers, partners and subcontractors as well as the local communities, where it operates, through self-evaluation questionnaires and on-site inspections. The cooperation of the subcontractors and suppliers in this process is taken for granted. The results of the evaluation and monitoring are published on an annual basis.

10. Final provisions - adoption and revision of the Policy

- 10.1 With the responsibility of the Group Sustainable Development Manager, the Human Rights Policy is communicated to employees and posted on the Group's website <https://ellaktor.com/en/>

- 10.2 The Human Rights Policy is approved by the Group's CEO, is reviewed on an annual basis, and revised, when necessary. Group's Sustainable Development Division is responsible for preparing and proposing policy revisions.