

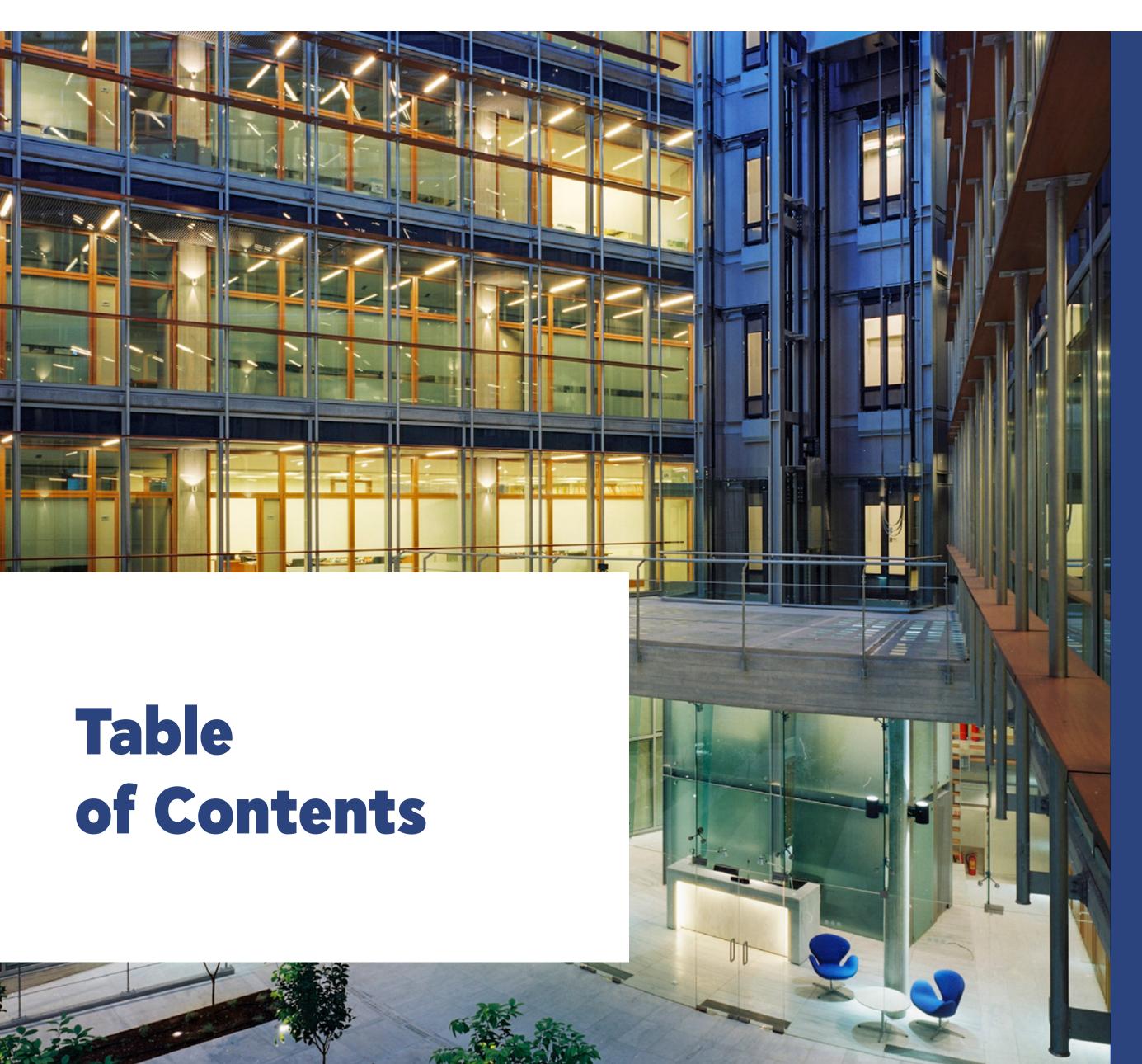
Investing in Greece. Investing in the Future.

Sustainable Development Report 2021



COORDINATORS

Directorate of Communication and Corporate Social Responsibility



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() | Message from the CEO

TERNA ENERGY has been one of the country's leading companies in the RES sector over the past 25 years, playing a leading role today in actualizing Greece's comparative advantage, in becoming a strong regional power with significant geopolitical influence. Through an ambitious growth plan, we aim for the Group's total installed capacity to reach 6.4 GW before the end of the decade.

During 2021, in alignment with our core principles and corporate values, we continued with the design and implementation of projects that contribute to the fight against the climate crisis impacts, the energy independence of Greece, as well as the reduction of energy prices, enhancement of employment, and contribution to the overall support of the Greek economy and society at a national and local level.

Moreover, a main priority of the Group is the development and implementation of a sustainability strategy aimed at continuous improvement and the implementation of aspirational targets. In this context, we committed to expanding the level of accountability and transparency of its activities. This 7th Sustainable Development Report of TERNA ENERGY Group, for the reporting year 2021, has been prepared in accordance with the new "GRI Standards 2021", the updated Athens Stock Exchange ESG Reporting Guide (2022) and the SASB Standard for "Electric Utilities & Power Generators. 2018".

Sustainable development and governance

Staying committed to ensuring our business continuity, and therefore our ability to create value for our shareholders and other stakeholders, the Board of Director's ESG Committee was established in 2021, with the responsibility to ensure the integration of non-financial factors in business strategy and decision-making.

Among others, we additionally updated the Internal Regulation of Operation ("IRO") and adopted a Sustainable Development Policy, Suitatibility Policy for members of the Board of Directors as well as a Human Rights Policy.

Contribution to climate crisis mitigation

In 2021, the renewable energy production units owned by the Group produced 2,284,254 MWh, helping to prevent the release of 1,350,589 tn of greenhouse gases (CO₂e).

At the same time, the Group also launched a series of actions aimed at establishing a specific action plan that will lead to the mitigation of its operations' carbon footprint. The Group is already in the process of identifying and assessing the climate risks and opportunities arising from all its activities, in alignment with the recommendations of the "Task Force on Climate-related Financial Disclosures" (TCFD) framework. In addition, for the first time in 2021, the Group calculated the indirect emissions linked to its value chain (Scope 3), so that the Group can set specific and measurable targets for the improvement of its performance going forward.

Nevertheless, we strengthen our leading role in the areas of sustainable development and the circular economy with integrated waste management projects, such as those of the regions of Epirus and Peloponnese, while we also contribute to digital transformation, through projects we have undertaken.

Our socio-economic footprint

The creation and distribution of direct and indirect economic value is our highest concern. Indicative of our efforts, our ongoing investment activity in Greece and abroad, amounted to € 217.4 mil. for 2021, representing an increase of 19.6%, while the direct economic value created by the Group, exceeded € 412,887 thousand. In addition, in 2021, the Group announced the expansion of its activities in the field of offshore wind farms and floating photovoltaics. Overall, our investments in production and storage projects are expected to create many new and mainly high-quality and highly-paid jobs.

All these achievements could not have been reached without the valuable contribution of our people, who are at the heart of our activities and for this reason, we continue to invest in their education and development. In addition, with the primary goal of safeguarding the health and safety of our employees, but also of all those employed in our activities and / or visiting our premises, we further enhance our controls and audits throughout Greece.

Every year we prioritize our social footprint by ensuring to strengthen our partnerships with local suppliers, creating relationships of trust and embracing local economies. In the year 2021, our total social contribution through sponsorships, donations and infrastructure projects in the areas where we develop new projects amounted to approximately €2 million.

The responsibility for the future is of great essence

Based on the assumption that development must respond to today's needs without compromising the well-being of future generations, we seek to ensure both short-term and long-term prosperity.

Despite the evolution of the Covid -19 pandemic and the energy crisis in 2022, we continued with our dynamic investment program, evolving at an intense pace:

In this context:

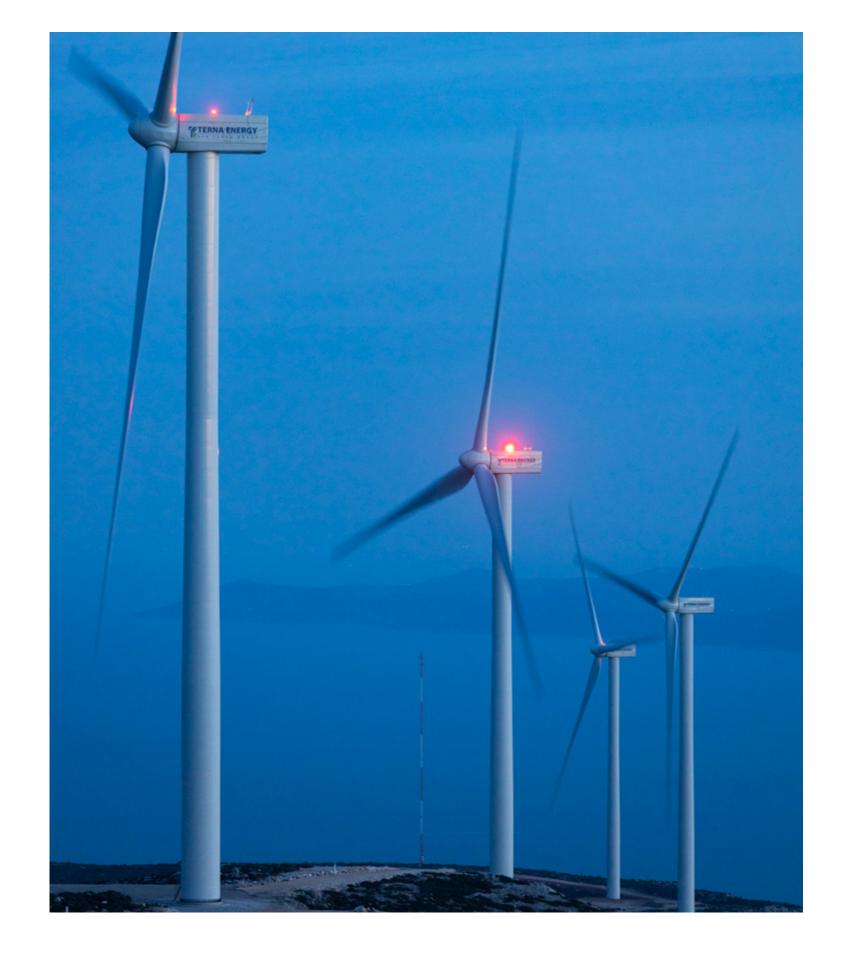
- We are implementing € 2.3 billion in investments, which will, by 2025, give the company a total installed capacity of 3 GW.
- For the 2026-2029 period, we are already launching additional projects with an installed capacity of 3.1 GW, through new investments of € 3.6 billion.

In 2022 we mark 25 years since the establishment of the company, hence is a landmark year for all of us at TERNA ENERGY. We take pride that from day one we have been creating value for all our stakeholders – the shareholders, the employees, the local communities that host our projects and all our partners. We always favor investments that have a high added value and a high multiplier, offering multiple benefits to the country: to local communities, to quality employment, to advancing "brain gain", to tax revenues and insurance contributions, to the national economy and society as a whole.

All the above, are clearly reflected in the actions we have taken so far and in which we continue to invest, for optimal corporate governance, environmental protection, and for a better society.

We will continue to work intensively and with absolute dedication to ensure the future and growth of our company.

Emmanuel Maragoudakis, CEO, TERNA ENERGY Group



TERNA ENERGY | Message from the CEO Sustainable Development Report 2021 | 4



TERNA ENERGY at a glance



€ 405.4 mil. turnover



€ 287.8 mil. value and 72,7% percentage of purchases from national suppliers



€ 1.9 mil. in social support programs



518



3,672 hours



895.3 mw total installed RES power capacity in Greece and abroad





Prevention of the emission of

1,350,589 tn CO,e

of greenhouse gases into the atmosphere



100%

of electricity consumed in Greece comes from renewable sources







GRI 2-1, 2-6

Profile

With a track record of 25 years, we continue to produce Clean Energy and to create pioneering projects, that contribute to Sustainable Development.



3.1 Activities, value chain and business relationships

TERNA ENERGY Group is based in Athens and is one of the largest vertically integrated Greek Groups in the field of Renewable Energy Sources (RES). The shares of TERNA ENERGY are listed on the Athens Stock Exchange (FTSE / Athex Large Cap).

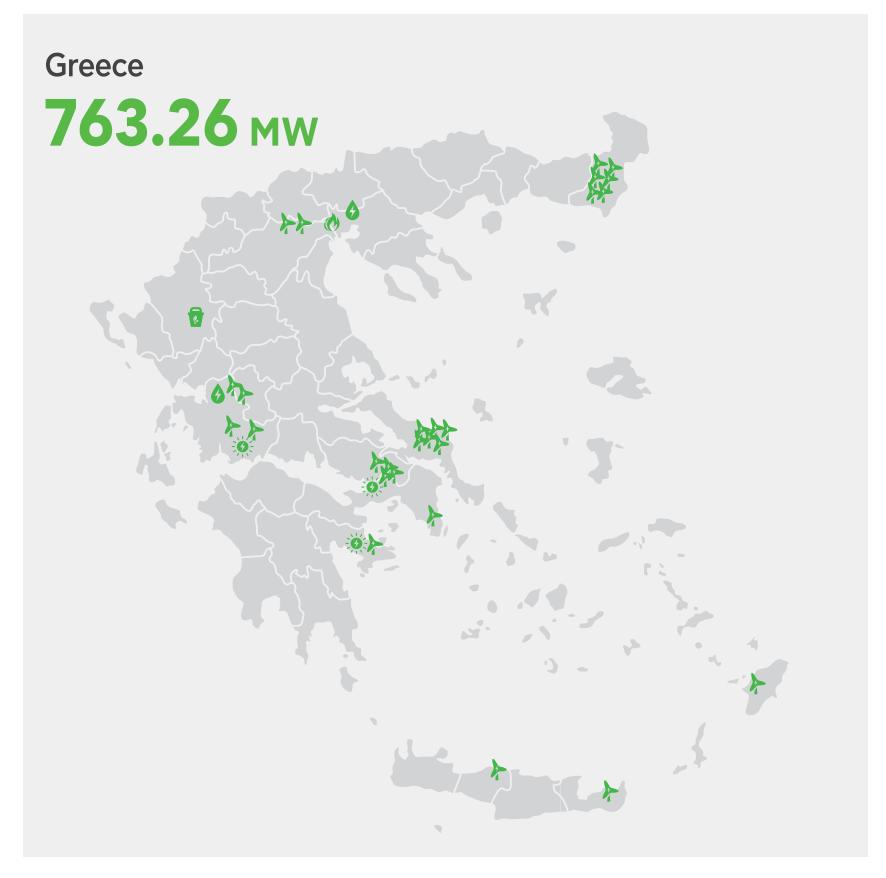


Activities

The Group's business activities include the construction, operation and maintenance of wind farms (41 in operation and 17 under construction), hydroelectric projects (2), pumped storage projects, hybrid stations and photovoltaics (3), as well as the undertaking of integrated waste management projects (1 in operation and 3 under construction), automatic fare collection systems (e-ticket) and biogas production (1). During the year 2021, the Group's activity, including electricity trading, was developed in the following countries: Greece, the United States of America, Bulgaria, North Macedonia, Poland, Serbia, Albania.

By the end of 2021, the Group had an installed capacity of 895.26 MW in Greece and abroad and specifically, 763.26 MW in Greece, 102 MW in Poland and 30 MW in Bulgaria. In addition, it has under construction or ready-to-build RES facilities with a total capacity of 388.2 MW in Greece.

Installed Capacity*







^{*}The capacity of the wind farms in the United States of America is not accounted for the reference year 2021, due to the Group's divestment from its participation in the three (3) Wind Farms of the Group in Texas Fluvanna 1, Fluvanna 2 / Gopher Greek and Bearkat I - with a total capacity of 510 MW.

TERNA ENERGY | Profile Sustainable Development Report 2021 | 7

1. ENERGY

Business activity in the energy sector mainly involves electricity generation from wind energy. In addition, the Group has hydroelectric and photovoltaic plants, as well as power generation projects using biomass at various stages of development.

- Wind farms

The Group has been constructing, operating and maintaining wind farms in various regions of Greece since 1997. Today, it has wind farms in Greece, Poland and Bulgaria while in 2021 announced its strategic partnership with Ocean Winds for the joint development of floating wind farms in the Greek seas, with a total capacity of 1.5 GW.

- Hydroelectric projects

The Group currently has two hydroelectric projects with a total installed capacity of 17.8 MW (Eleousa – capacity 6.6 MW, Dafnozonara - capacity of 11.2 MW), while a series of other hydroelectric projects, with production licenses, are already in the development phase.

- Storage projects

The Group develops energy storage projects. The Group's projects in Amfilochia with a capacity of 700 MW and in Amari (Crete) with a capacity of 180 MW, are at an advanced stage of development. These are two investments of more than EUR 770 million which will be critical in supporting the energy infrastructure system of our country, with a low environmental footprint and multiple benefits for the system.

- Photovoltaic stations

The Group constructs, operates and maintains photovoltaic plants in various regions of Greece, with a total installed capacity of 8.5 MW. During 2021, the Group decided to expand its activities in the field of floating photovoltaic parks and submitted to the Regulatory Authority for Energy (RAE) applications for the granting of producer's certificates for (3) three installations of floating photovoltaic parks in an equal number of artificial reservoirs, the total capacity of which amounts to 265 MW.

- Biogas

Through the Biogas Plant in Adendro, Thessaloniki, the Group is active in the field of electricity production through the production and combustion of biogas. Biogas is produced, through the process of anaerobic digestion of waste, from dairy cow farms and from corn silage and/or other organic substances. The installed capacity of the unit is 1 MW.











TERNA ENERGY | Profile

2. CONCESSIONS

The concessions sector concerns the construction and operation of projects of public interest (e.g., the Unified Automatic Fare Collection System and Municipal Waste Treatment plants) in exchange for granting long-term service admission to the public.

- Unified Automatic Fare Collection System

The Group implemented and operates the Unified Automatic Fare Collection System of the Athens Urban Transport Organization, while during 2021 it signed a contract for the Digital Transformation, Telematics, and Unified Automatic Fare Collection System of the Thessaloniki Transport Authority.

- Waste Management

In the field of waste management, the Group has undertaken the PPP waste management projects in the Region of Epirus and the Peloponnese Region. The Waste Management Unit of Epirus is in commercial operation and has an exploitation horizon of 25 years. The construction of the Peloponnese PPP project began in 2021.







Value chain and business relationships

In the context of its business activity, the Group cooperates with several suppliers and subcontractors daily. The following table presents, in detail, the value chain of the TERNA ENERGY Group:

Activities Upstream Downstream Supply of electricity for the operation of the facilities **ENERGY:** Wind -Wind farms Solar radiation River water (hydroelectric sta--Hydroelectric projects tions) -Energy storage projects Supply of fuels and materials -Photovoltaic stations Transmission and distribution through the national electricity grid. for operation and maintenance -Biogas purposes (Hydrogen-H2- for (Substations, Transfer lines, Districooling, special chemicals, bution lines) lubricants for turbine mainte-**CONCESSIONS:** nance) Organic raw materials (waste -Unified Automatic Fare from dairy farms, corn and / or other organic raw materials) **Collection System** • Suppliers of raw materials -Waste Management Equipment suppliers

TERNA ENERGY | Profile Sustainable Development Report 2021 | 9



3.2 Our business model

Inputs	Business Activities and Values	Products and Services	Outputs: The value we create		
FINANCIAL CAPITAL - Equity and lending			FINANCIAL CAPITAL Turnover € 405.4 million		
HUMAN CAPITAL - 518 Employees - Knowledge, skills and abilities - Ethical values	Our values are reflected in five (5) main axes and are analyzed in the Code of Conduct: Organization - Corporate Culture Customers / Partners / Suppliers Employees Society Environment OUR BUSINESS ACTIVITIES: Wind energy projects Hydroelectric projects Storage Projects Photovoltaic projects Biofuel production projects Waste management projects Unified Automatic Fair Collection System project Implementation and operation of the Unified Automatic Fare Collection System (e-ticket)	are analyzed in the Code of Conduct: • Organization – Corporate Culture • Customers / Partners / Suppliers		HUMAN CAPITAL 3,672 hours of training (Greece and abroad)	GOVERNANCE - Ensuring regulatory compliance and business ethics
NATURAL CAPITAL - Air - Water - Land use - Raw materials			NATURAL CAPITAL Preventing the release of 1,350,589 tn CO ₂ e of greenhouse gas emissions into the atmosphere	 ENVIRONMENT Our contribution to tackling climate changeThe protection of biodiversity and the preservation of local 	
MANUFACTURED CAPITAL Business units - 41 Wind Parks in Greece, Europe - 3 Photovoltaic Parks in Greece - 2 Hydroelectric Projects - 1 Integrated Waste Management plant - 1 Biogas production plant		Products and Services from activities*	MANUFACTURING CAPITAL 2,284,254 MWh of RES energy produced in 2021	 ecosystems Soil PEOPLE Creation and distribution of direct and indirect economic value Healthy and sustainable communities 	
INTELLECTUAL CAPITAL -Intellectual Property -Protocols, Procedures			INTELLECTUAL CAPITAL Adoption of a Sustainable Development Policy Adoption of Human Rights Policy	 Access to affordable and clean energy Promoting health, safety and well-being 	
SOCIAL AND RELATIONSHIP CAPITAL -1,739 national suppliers, 90% of the total -177 international suppliers, 9% of the total -16 related parties, 1% of the total			SOCIAL AND RELATIONSHIP CAPITAL €1.9 million in social support programs		

*As mentioned on pages 8-9



04Sustainable Development

Approach

In 2021, the Group, following approval by the Board of Directors, adopted a Sustainable Development Policy. The objective of the Policy is the enhancement of the positive and minimization of the negative (actual and potential) impacts, through best practices, sustainable practices, and reliable partnerships, aiming at the continuous improvement of the Group's performance for the benefit of its stakeholders.





4.1 Sustainable Development Policy

The Group's priority for sustainable development is to address climate change through:



Being active across a wide range of green technological applications.



Setting targets to reduce greenhouse gas emissions from our activities.





The prevention of releasing greenhouse gas emissions into the atmosphere as a result of the activity of producing electricity from renewable energy sources.



In 2021, the Group, following approval by the Board of Directors, adopted a Sustainable Development Policy. The objective of the Policy is the enhancement of the positive and minimization of the negative (actual and potential) impacts, through best practices, sustainable practices, and reliable partnerships, aiming at the continuous improvement of the Group's performance for the benefit of its stakeholders.

The Group's Sustainable Development Policy is inextricably linked to the material topics identified through the materiality analysis process, which is completed on an annual basis for the Group to constantly take into consideration the needs of stakeholders (internal and external), as well as current socio-economic trends in relation to their impacts (positive, negative).

The Policy is monitored by the Directorate of Communication and Corporate Social Responsibility and the ESG Committee and, if required, is subject to revision/review with final approval by the Board of Directors.



Within the framework of the Group's Policy, sustainable development is in line with the ESG (Environmental-Social-Governance) criteria/pillars and concerns four (4) axes of activity:



Message from the CEO TERNA ENERGY at a glance Sustainable Development Approach Governance Environment Appendices



4.2 Management of sustainable development issues

The Sustainable Development team is responsible for effectively managing sustainable development and corporate responsibility matters. The team consists of specialized executives from all key divisions of the Group. The Directorate of Communication and Corporate Social Responsibility is responsible for the coordination. The CEO, through a direct line of communication, has undertaken the overall management/supervision of Sustainable Development issues, sealing the commitment of the Group's Senior Management towards sustainable operation. In addition, the Board of Directors receives an update on ESG issues on a monthly basis during its meetings with the ESG Committee.

The Sustainable Development team:

Has the authority to coordinate sustainable development matters

Is responsible for the data collection necessary for the development of the Annual Sustainable Development Report.

Is in constant communication with employees regarding the implementation of initiatives that fall under the management of Sustainable Development issues.

Provides regular and material information to the top management of the Group.

Defines policies and procedures and coordinates the implementation of programs concerning the environment, employees and the society.



4.3 Stakeholder Engagement

The Group's Policy for Sustainable Development is based on dialogue with its stakeholders to identify, evaluate and prioritize the most significant impacts that its activity creates or may create on the environment, people, and the economy. For TERNA ENERGY Group, stakeholders are defined as those entities or individuals who may reasonably be significantly affected by the Group's activities, or those who may reasonably influence its ability to implement the Sustainable Development Policy and/or achieve its objectives.

Systematic communication with the Group's stakeholders becomes important both for the responsible and effective presence and activity in local communities, as well as for the formulation and implementation of the Sustainable Development Policy. To this end, the Group ensures, from the beginning, and throughout its projects to maintain open channels of communication, both with local communities through regular meetings, as well as with its stakeholders as a whole, ensuring transparency and reliable reporting about the progress of its ongoing projects, always respecting any of their reactions and objections to be investigated and resolved.

The following table summarizes the stakeholder groups, engagement methods, and frequency of engagement with them:

Stakeholders	Communication Channels/Engagement Methods	Frequency of Engagement
Employees	Regular meetings and updates	VA/le are we assisted
	Corporate Announcements	When required
	Website	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	Corporate Events	Where appropriate
	Internal Communication (e-mail, newsletter)	When required
	Social Media	Weekly
	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Phone Communication	
	E-Mail	When required
	Meetings	
Local Communities / Local Government	Corporate Events	Where appropriate
•	Social Media	Weekly
	Financial Report	Quarterly
	Sustainable Development Report	Annually
	E-Mail	Deily
	Phone Communication	Daily
Suppliers / Subcontractors / Partners	Meetings	When required
	Financial Report	Quarterly
	Sustainable Development Report	Annually
Clients	E-Mail	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	Corporate Events	Where appropriate
	Phone Communication	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	Meetings	When required
	Website	When required
	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Phone Communication	
	Meetings	
Regulatory Authorities / Government Bodies	E-Mail	Where appropriate
	Corporate Events	
	Sustainable Development Report	Annually
	Financial Report	Quarterly

Ενδιαφερόμενα μέρη	Δίαυλοι Επικοινωνίας/Τρόποι Διαβούλευσης	Συχνότητα Επικοινωνίας
Local Communities	Phone Communication	When required
	Meetings	
	E-Mail	
	Corporate Announcements	writere appropriate
	Corporate Events	
	Sustainable Development Report	Annually
	E-Mail	Where appropriate
	Financial Report	Quarterly
	Website	When required
	Phone Communication	
	E-Mail	When required
	Meetings	
Financial Community	Corporate Events	Where appropriate
Financial Community	Social Media	Weekly
	Website	When required
	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Corporate publications and articles	Where appropriate
	Personal Communication	Daily
	Conferences and events	
Media	Studies and corporate reports	Where appropriate
Media	Website	When required
	Financial Report	Appually
	Sustainable Development Report	Annually
	Social Media	Where appropriate
	Social Media	Where appropriate
	Conferences and consultation events	Where appropriate
	Corporate publications and articles	Where appropriate
Non-governmental - Non-profit organizations	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Social Media	Where appropriate
	Website	Daily
	Corporate publications and articles	Where appropriate
	Conferences and events	Where appropriate
Business Community	Studies and corporate reports	Where appropriate
Business Community	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Social Media	Where appropriate
Independent Evaluation and Audit Bodies	Corporate publications and articles	
	Conferences and events	Where appropriate
	Studies and corporate reports	
	Financial Report	Quarterly
	Sustainable Development Report	Annually

4.4 Materiality analysis

The Group, adopting the new methodology of the international GRI Standards (2021), completed the identification, assessment, prioritization, and validation of the positive and negative impacts that creates or may create on the environment, people, and the economy. The prioritization of the identified impacts contributed to the determination of the Group's sustainable development material topics.

The materiality analysis for the reference period was carried out through the following four phases:

UNDERSTANDING THE ORGANIZA-TION'S CONTEXT

Business model (internal environment) and external environment review:

Understanding of the business model and business relationships and the external environment, through a review of documents and available relevant material (e.g., sectoral sustainability criteria (e.g., GRI, SASB, etc.), sectoral studies and sectoral criteria of ESG evaluation bodies (e.g., RobecoSAM, MSCI, etc.).

Mapping of stakeholders, through a review of documents and available relevant material, taking into account: The main stakeholder groups that affect and/or are affected by the Group's business activities, as presented in the previous section.

IMPACT IDENTIFICATION

Identification of positive and negative (actual and potential) impacts on the environment, people, and the economy: Based on the Group's operation and business relationships, and as emerged as material by sustainable development sectoral standards, sectoral criteria of evaluation bodies and other organizations.

IMPACT ASSESSMENT

Materiality analysis survey:

Internal survey completed by the Group's executives on behalf of the stakeholder groups they represent and with whom they consult on issues, based on their expertise, regarding the environmental, economic, and social impacts. Representatives of Capital Providers also participated in the survey.

Criteria for assessing positive (actual and potential) impacts:

- the scale.
- the scope and
- the likelihood of them occurring (likelihood), in case of positive potential impacts

Criteria for assessing negative (actual and potential) impacts:

- the scale.
- the scope.
- the irremediable character/severity and
- the likelihood of them occurring (likelihood), in case of negative potential impacts

Collection and analysis of responses:

Following the completion of the process, the responses were collected and analyzed to determine the results of the impact assessment.

IMPACT PRIORITIZATION

Matching impacts with sustainable development topics

Following the impact assessment, the impacts were matched/grouped into sustainable development topics.

Threshold of materiality

Subsequently, the threshold was set by the Group's Management, based on which a sustainable development topic is characterized as material, and is illustrated in the table below.

Validation of the list of material topics

Finally, the list of material topics was developed and validated by the Group's Management. As a result, the content of this Report was determined.

Through the materiality analysis process, it was identified that the Group's activity creates or is likely to create positive and negative impacts on the environment, people and the economy, in the following areas:



Material topics

Based on the results of the impact assessment, the following topics were characterized by the Group's Management as material. These topics have formed the basis for determining the content of this Report.

Regarding the identification, assessment, and prioritization of the negative impacts, emphasis was placed on the impact the Group would create from potential omissions or improper implementation of established Group policies and procedures, on the environment, people and the economy.

Positive impact areas:

Climate

Soil

Biodiversity

Direct economic

value

Healthy and sustainable

communities



6 CLEAN WATER AND SANITATIO





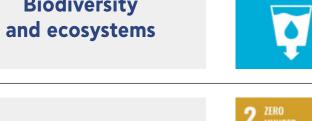






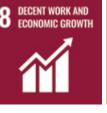














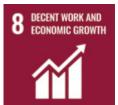
Negative impact areas:

Access to energy



















Regulatory compliance and business ethics





Health, safety and wellbeing



Compared to 2020, «Soil» and «Access to affordable and clean energy» emerged as new material topics. Additionally, five (5) topics that have not been characterized as material in the 2021 materiality analysis, have been selected by the Top Management to be included and analyzed in this Report, as they are integral to the strategic direction of the Group and its subsidiaries. These topics are «Emergency Preparedness-Business Continuity», «Employment», «Education», «Human Rights» and «Indirect Economic Value». The topic "Employment" was material topic for the Group in the 2020 Sustainable Development Report.











The actions taken to mitigate and address the actual and potential negative impacts, as well as the actions to enhance the actual and potential positive impacts on the aforementioned material topics, are described in more detail in the following chapters.

TERNA ENERGY | Sustainable Development Approach



4.5 Participations

The Group, with its active participation as a member in bodies, organizations, and business associations, promotes the development of dialogue and the exchange of positions, views, but also know-how, as well as the collective monitoring and management of social, labor, environmental, as well as development and market issues. This dialogue is a means of advancing its firm positions towards creating the conditions for securing a more sustainable future.





05

Governance

TERNA ENERGY adopts principles and practices, which ensure all the legal interests of all its stakeholders, contributing to the optimal functioning of the Group.



5.1 Corporate Governance

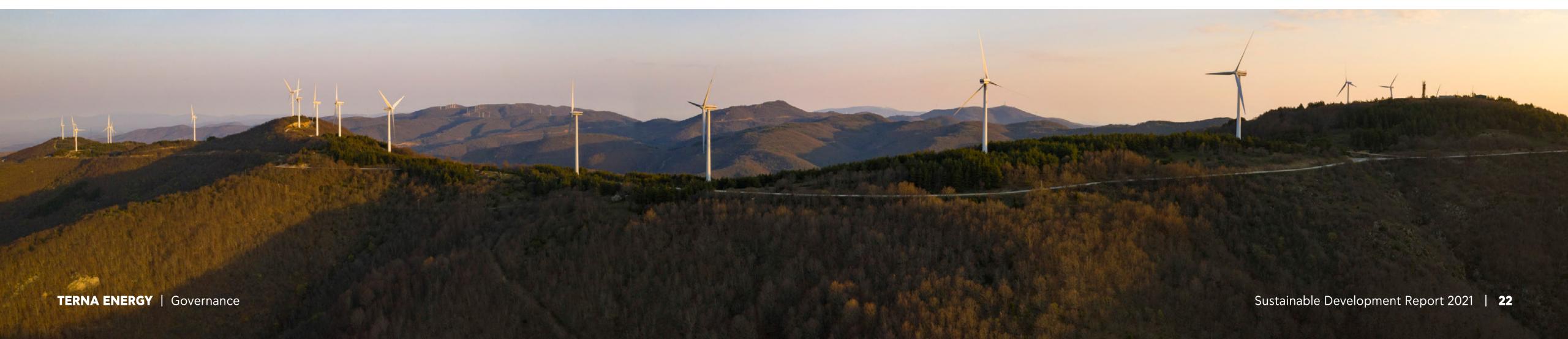
Hellenic Corporate Governance Code (CGC)

Corporate Governance constitutes the set of established rules and business practices that the Group applies, so as to ensure its business continuity and therefore its ability to create sustainable profitable growth and value for its shareholders and other stakeholders. The responsible and ethical corporate governance that the Group promotes across the whole range of its activities, is reflected in the Hellenic Corporate Governance Code (CGC) of the Hellenic Corporate Governance Council, which has been adopted by the Management.

Internal Rules of Operation

During 2021 the Group's main target, was its full compliance with the recent Law 4706/2020, "Corporate governance, provisions for capital market modernization, transposition of EU Parliament and Council Directive 2017/828 into Greek law, implementing measures for EU Regulation 2017/1131, and other provisions". The Internal Rules of Operation was approved and came into effect by decision of the Board of Directors from 16/07/2021, whose responsibility is to review and update the regulation when required and which is applied proportionally to all subsidiary companies of TERNA ENERGY, excluding the significant subsidiaries that possess their own internal rules of operation.

Guided by its values, and committed to operating with responsibility towards the environment, the society, its shareholders, its supervisory bodies, its employees and customers, financial institutions, and stakeholder, it creates all the necessary regulatory tools to meet their demands.



Europe and Other Countries

Business General Division

Group Management and Committees

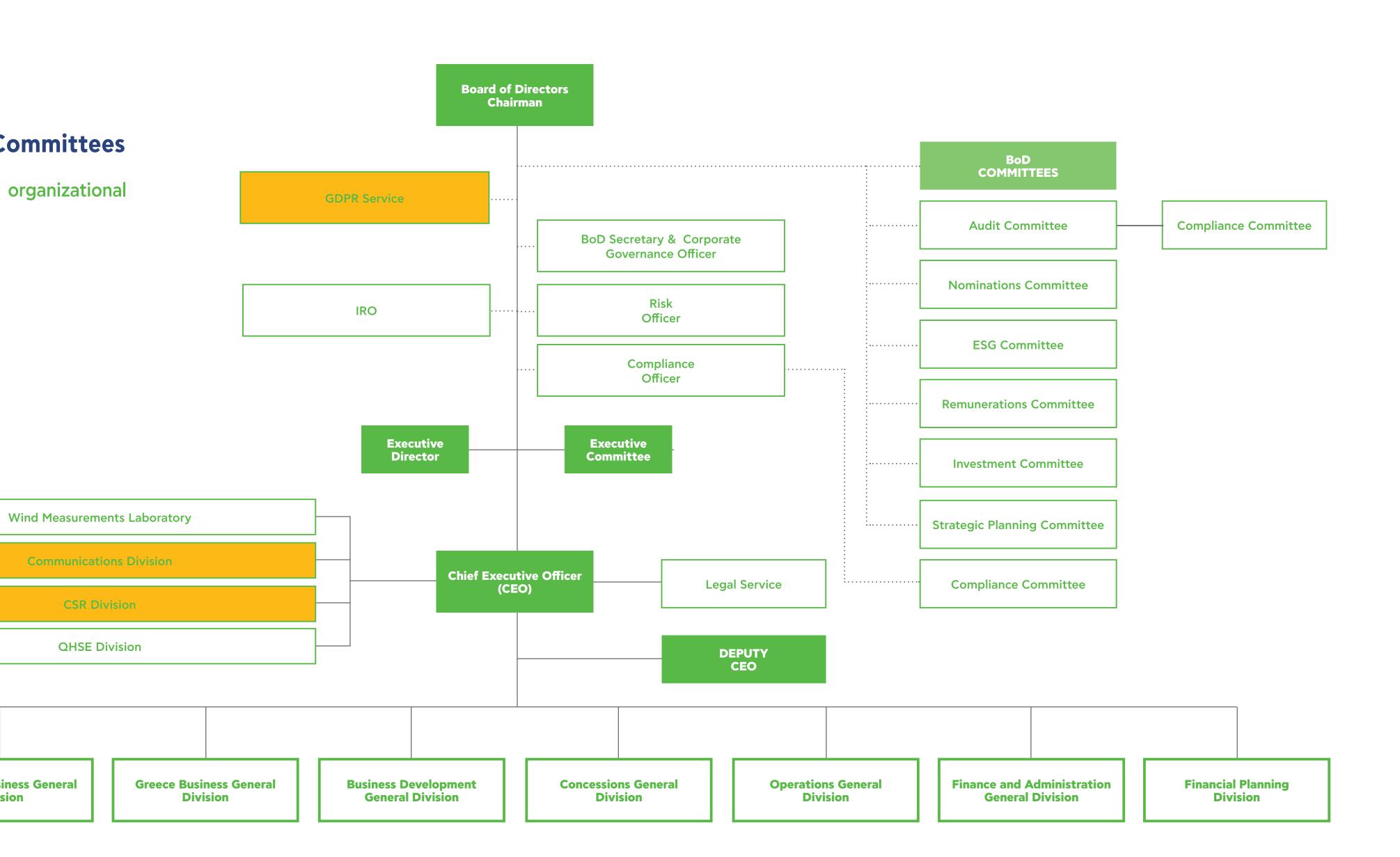
The following diagram illustrates the organizational structure of the Group:

CSR Division

QHSE Division

Americas Business General

Division



TERNA ENERGY | Governance Sustainable Development Report 2021 | 23

The Board of Directors (BoD) is the highest administrative body, its members are elected by the General Meeting of Shareholders and its mission is to draw up the guidelines and formulate the business strategy, effective administrative operation, the implementation of the principles, and the management philosophy of the Group, while deciding on all corporate affairs, except those that fall under the competence of the General Assembly. The President of the Board of Directors (executive member) is Mr. Georgios Peristeris, Vice chairman of the BoD (independent non-exexutive member) is Mr. George Mergos and the CEO is Mr. Emmanuel Maragoudakis.

The term of the Board of Directors is four years and consists of 4 executive and 7 non- executive members (of which 5 are independent). From the BoD's members, 9 of them are in the over 50 age group and 2 of them in the 30-50 age group. It is noted that 3 women participate in the BoD (27% of the total number of members).

☐ Further information about the BoD members of the Group is available on the Group's website.

In order to exercise its duties and implement a responsible business model, the Group's Board of Directors is supported by Committees which have an advisory role, but also a special weight in its decision making.

The Committees are the following:



Committee



Strategic Planning Committee



Nominations Committee



Investment Committee



Remuneration Committee



ESG Committee

For the orderly and more efficient operation of the Group, an Executive Committee has been set up, which consists of six (6) members with executive responsibilities. The Executive Committee is responsible for the implementation of the strategic planning, which is determined by the Board of Directors. Moreover, the Executive Committee is responsible for the implementation of the decisions of the Board of Directors and the execution of the powers assigned to it for the administration and operation of the Group.

Further information about the BoD's Committees is available on the Group's website.

With the establishment of the ESG Committee during 2021, the Board aimed to better supervise issues of sustainable development and conduct relevant discussions during meetings with Committee members. The Committee meets at least 4 times a year and discusses the Group's goals regarding ESG issues. The ESG Committee was established by the Board to monitor the Group's performance and suggest improvements in the areas of the environment, society and corporate governance.

The Committee's work includes, inter alia, monitoring the integration of non-financial actors in the business strategy and decision-making, with the aim of maintaining the Group's resilience and ability to adapt to changes in the environment in which it operates. The ESG Committee consists of four (4) members (1 executive and 3 independent non-executive members). During 2021, the Committee met four (4) times.

☐ Further information concerning the ESG Committee, and its members is available on the Group's website.



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Conflicts of interest

Issues concerning the avoidance of conflicts of interest, are described in detail in the Code of Conduct which is available on the Group's website.

Moreover, the Group applies the Conflicts of Interest Policy, which aims to define the main principles that every employee must follow in matters of conflicts of interest that affect or may affect not only the Group and its affiliated companies' interests, but also the interests of its customers, suppliers and partners.

The Policy aims:

- To identify potential situations of conflicts of interest between employees and the Group.
- To determine the rules that should be followed by all staff in order to effectively manage these situations, when they arise.
- The assignment of roles and responsibilities for the implementation of the Policy.
- Ensuring compliance with the institutional and supervisory framework.

The Group, aiming to achieve the above objectives, takes appropriate preventative measures and commits to the following:

- a. Employees' and BoD members' awareness raising and training regarding the Code of Conduct and the applicable policies and procedures so as to make clear the importance of reporting conflicts of interest issues for the reputation, prestige and transparency of the Group.
- b. Setting out mechanisms and prevention measures to promptly identify and manage conflicts of interest issues. The mechanism aims to ensure that all staff and BoD members act without prejudice regarding the Group's interests.
- c. Application of information security procedures implemented by the Group to safeguard and properly manage confidential and privileged information. Access to this type of information must be given in a controlled way and only to specific individuals, who, following an evaluation process have been concluded to require such information to perform their duties. The Group has taken appropriate technical and organizational measures so as to ensure access, integrity and preservation of such information to prevent its leakage, alteration and access by unauthorized personnel.
- d. Transactions control through the Internal Control Unit (ICU). This Unit (during the period of use) supervises the transactions of covered persons in the Group's financial instruments on a regular basis, so as to identify potential transactions that conflict with the Group's interests and/or occasions of possible abuse of privileged information.



Suitability Policy for the Members of the BoD

In 2021, the Group adopted the <u>Suitability Policy for its BoD members</u>, which is monitored by the Nominations Committee, in accordance with the Law 4706/2020 on the eligibility policy for Board Members.

This Policy aims to ensure quality staffing, efficient operation, and fulfillment of the role of the Board, based on the overall strategy and both medium and long-term business aspirations of the Group, aiming to promote its corporate interests. The Policy's goal is to have a highly efficient Board of Directors.

The Board members must meet individual & collective eligibility criteria:





Training policy for the BoD members & Executives

In addition, the Group implements a training policy for the BoD members & Executives, which presents the basic steps of their training plan. The Policy aims for the BoD members & the Executives to acquire a comprehensive knowledge of the Group's operation, a clear knowledge of its organizational structure, its business model, the risk profile, and the financial and regulatory developments in the fields of activity at the international and national level. At the same time, it aims to improve their skills and institutional knowledge for the effective performance of their duties on an ongoing and a case-by-case basis, in the context of right corporate governance. For that, a training plan has been developed that includes the following topics: Introduction to the Group, Corporate Governance System, Cybersecurity, Business Continuity Plan, Environment-Social-Governance, etc.



Procedure for evaluating the performance of Senior Executives

For the evaluation of the Senior Executives, the Group applies the performance evaluation process, in which the relevant actions are recorded.

CEO evaluation process



The evaluation process is carried out once a year for the effective fulfillment of their duties based on the obligations arising from the current legislation, the statutes, the operating regulations and the Suitability Policy. The CEO is evaluated by the members of the Board of Directors. The evaluation process is chaired by the Independent Non-Executive Vice President and the Nominations Committee. The Nominations Committee conducts the evaluation with the support of an external consultant.

Evaluation process of the Board members (except CEO)



The self-assessment process is carried out once a year for the effective fulfillment of their duties based on the individual eligibility criteria as provided for in the Suitability Policy and the obligations arising from the current legislation. The Nominations Committee, with the support of an external consultant, conducts the evaluation of the Board of Directors and the Board Committees including the ESG Committee.

Evaluation process of Senior Executives (excluding CEO & Board members)



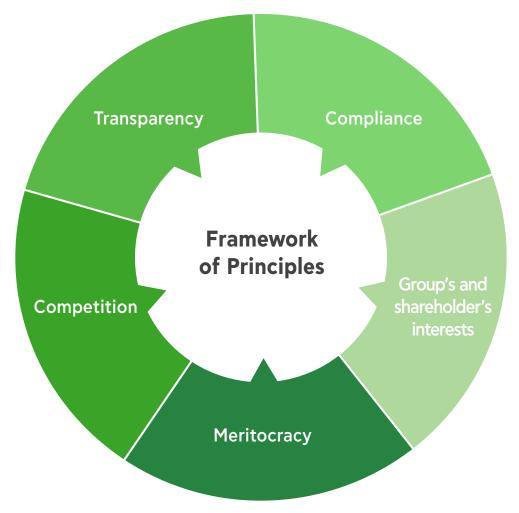
The evaluation process is carried out once a year for the effective fulfillment of duties based on qualitative and quantitative criteria, as defined in the company evaluation system.



Remuneration policy of the BoD members

The Group applies the Remuneration Policy, to enhance the transparency of the remuneration of the Board members and the senior executives. The purpose of this Policy is to comply with the legislative framework and to enhance transparency in the determination and payment of all types of remuneration in a coherent, clear and comprehensible manner.

The guiding principles governing this policy are depicted below:



The responsibility for the formulation of the Remuneration Policy lies with the Group Remuneration Committee, which is approved by the General Assembly. In formulating the Remuneration Policy, market conditions and competition, the importance of retaining senior executives and attracting new capable ones are considered. The Committee is responsible for reviewing the Remuneration Policy following a study conducted on the range of wage levels in the market in collaboration with an independent consultant.

Further information on the components of fixed and variable pay and additional benefits, are available in the Remuneration Policy on the Group's website.

Risk management

The identification, assessment and management of existing and potential risks is an important part of the Group's strategy, as it affects the decision-making process and the implementation of the business model. In the context of transparency and effective management of business risks, as well as a culture of direct and uninterrupted communication of all employees, the Group facilitates the access of the relevant managers to and from the top management on a daily basis, in order to obtain a direct understanding of the risks and to proceed with taking the required decisions and corrective measures in a prompt and dynamic manner.

In addition, the Group, as part of the certified unified management system, applies the risk analysis process, which concerns the ISO 9001, 14001, 45001, 50001, 27001 and 37001 systems. The risk assessment analyzes the risk factors per activity and process, analyzes their impacts (threats and opportunities), captures the existing control measures and finally assesses the degree of risk, examining the severity of the impact and each risk's probability of occurrence.

In 2021, the Group began the process of identifying and qualitatively assessing the physical and transitional risks and opportunities arising from Climate Change, in line with the recommendations of the "Task Force on Climate-related Financial Disclosures" (TCFD). The identification process is ongoing and is expected to be completed within 2022. To address non-financial risks, the Group adopts mitigation policies, which are analyzed as part of the material topics examined in this Report.

5.2 Ensuring regulatory compliance and business ethics



ATHEX ESG

OUR APPROACH

Impacts

The operation of the Group creates or may create the following positive and negative impacts:

Regulatory compliance and business ethics





In an ever-changing regulatory and business context (international, European, national), the continuous promotion of business ethics and regulatory compliance are a critical pillar of the Group's operation, as they diffuse across the range of its activities and influence the professional behavior of its people. The topic concerns employees, suppliers & partners but also the government, state & institutional bodies.

In order to strengthen the positive impacts on this material topic, the Group sets targets for the first time, the progress of which will be evaluated on an annual basis. Particularly the objectives for the next reporting year are:

Targets 2022 The maintenance of zero confirmed incidents of corruption, either through complaints or through the controls that the Group carries out in the context of preventing and combating any incidents of corruption. Maintaining zero fines and/or non-financial penalties for non-compliance with laws and/or regulations regarding the Group's business operations and activities.

Certification based on the new International Standard ISO 37301:2021 "Compliance Management Systems"

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Certifications, procedures and policies

In order to strengthen the actions for business ethics and regulatory compliance, the Group complies with the general principles provided by international regulations and conventions, as well as by international standards. To ensure the implementation of the standards, the Group undergoes periodic audits by accredited bodies from which it has received the corresponding certifications. The valid certificates of the TERNA ENERGY Group during 2021 were the following:



9001:2015 **Quality management**

system



Environmental management system



Occupational health and safety management system



Energy management system



Information security management system



Anti-bribery management system



Compliance management system



Organization friendly to citizens with disabilities

In this context, TERNA ENERGY implements:



Code of Conduct (COC)



Human Rights Policy



Regulatory Compliance and of corruption and bribery control Policy



Policy related to unhealthy competition



Travel and hospitality Policy



Gifts Policy



Sponsorship and Donations Policy



Conflicts of Interest Policy



Combatting Violence and Harassment at Work Policy



Remuneration



Due Diligence



Complaints procedure

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Code of Conduct (COC)

The Code of Conduct (COC) is the basic operating framework of the Group, which characterizes the professional behavior of its people. The COC includes, among others, the following thematic elements:



Human rights: diversity, integrity and dignity



Employment relationships and practices



Equal opportunities



Harassment in the workplace



Employee health and safety



Conflicts of interest



Personal data



Fight against corruption and bribery



Selection of suppliers and partners and continuous evaluation based on strict criteria



Engagement with local communities and contribution to local development and economy



Environmental Protection



Energy and water consumption



Integrity of financial data and reports

The Group oversees the implementation of the Code of Conduct, monitors its implementation, informs and educates its people, enables the development of reports, evaluates any discrepancies, and takes relevant measures and corrective actions.



Implementation of the COC and implementation monitoring

The Code's content is in accordance with the general principles set out in the International Regulations and Conventions as well as the international ISO 9001, ISO 14001, ISO 45001, ISO 39001, ISO 37301, ISO 37001, ISO 50001 and SA 8000 standards. The application of the Code covers all the companies and subsidiaries of the Group at the national and international level, concerns all areas of activity and is considered in all partnerships and joint ventures in which it participates. The Regulatory Compliance Committee and the Regulatory Compliance Unit, which report directly to the Board of Directors, monitor the implementation of the Code of Conduct.

Continuous information and training

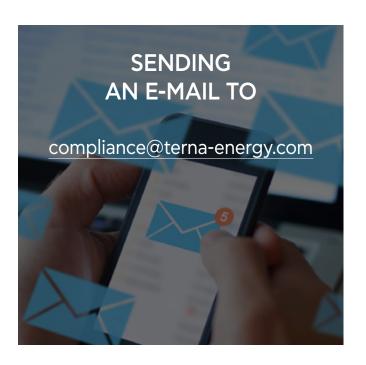
The Group conducts trainings (live and online) for the correct implementation of the Code of Conduct. During 2021, an e-learning was planned and implemented regarding "Regulatory Compliance, Code of Conduct, Control of Corruption and Bribery", which aimed to explain the concepts and requirements of the Anti-Corruption and Bribery Management System, the Regulatory Compliance and the Code of Conduct and the presentation of cases and scenarios of illegal behaviors, actions and acts of corruption and bribery.



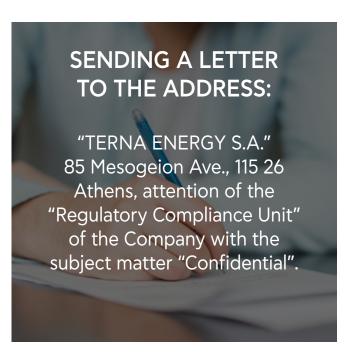


Reporting availability

In the context of the correct use of TERNA ENERGY's Code of Conduct, the following channels of communication with the Regulatory Compliance Unit are available for reports of cases of fraud, corruption, bribery, conflicts of interest and harassment at work, regulatory compliance and general deviations from the Code of Conduct, either named or anonymous:







The above mechanisms also apply to partners / suppliers.

TERNA ENERGY Group does not show any tolerance in cases of retaliation against the employees who have made reports on the issues of the Code. Retaliation can include threats, intimidation, exclusion, degrading conduct, malicious comments and behavior, etc. In the event that the Group becomes aware of such behavior, it is reported immediately following the mechanisms mentioned above.

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Evaluation of deviations and response measures

The reports are investigated by the Regulatory Compliance Unit and are communicated to the Regulatory Compliance Committee and the Board of Directors.

The above procedure is controlled and evaluated during the internal audits that are implemented within the Management System applied by the Group. In addition, during the ongoing employee trainings and internal audits, the Regulatory Compliance Unit receives feedback and addresses concerns surrounding the implementation and effectiveness of the process.



During the previous year, no report was made to the Group related to issues regarding the Code of Conduct.

There were no confirmed cases of non-compliance with laws and regulations.

There were no confirmed incidents of corruption. In particular, there was no incident of corruption that led to the dismissal or disciplinary action of employees, the termination or non-renewal of contracts with partners, and no related court case.

There were no financial losses as a result of breaches of business ethics.



Personal Data Protection Policy

For the TERNA ENERGY Group, the protection of the personal data of individuals who trade in any way with its companies is of paramount importance. For this reason, the Group implements a policy for the protection of personal data and has developed and implements an Information Security Management System, certified according to the international standard ISO / IEC 27001. It has also appointed a Personal Data Manager (DPO) and a Personal Data Protection Unit to monitor the compliance of the Group.

For the purpose of conducting its business activities, the Group processes personal data concerning individuals for whom identification data is obtained (as for example, the company's customers, suppliers, shareholders and investors, as well as ordinary users of the website), in accordance with the European legislation on the General Data Protection Regulation (GDPR-GPD 2016/679) and law 4624/2019.

In the context of ensuring a level of security commensurate with the criticality and confidentiality of the moving data and information, the Head of Information Security Management System cooperates with the Group Head of Information Security Systems (CISO). In addition, the Board is regularly informed on data security issues during its meetings.



In 2021, there were no documented complaints and grievances surrounding customer privacy breaches and data loss. There were also no incidents of leaks, theft or loss of customer data.

☐ Further information about the Policy is available on the Group's website.



Terms of cooperation with suppliers

The responsible management of its supply chain is at the center of the Group's efforts to create long-term value across its business operations, but also through the conclusion of responsible business relationships with its suppliers and partners. The Group recognizes that the responsible management of its supply chain presupposes responsible collaborations with the mutual contribution and dialogue of all the contracting parties.

In this direction, the Group communicates the minimum cooperation requirements and ensures that its cooperating suppliers comply with environmental, energy and social criteria, such as:

Their certification in international standards e.g., ISO 14001 and ISO 50001.

The implementation of policies and procedures for the protection of the environment and society as a whole.

The disposal and use of materials and equipment that, in addition to their suitability and usability, have high health and safety standards, are environmentally friendly and belong to a high energy class of low energy consumption.

Necessary conditions for cooperation with any supplier, is full compliance with the regulatory framework for Health and Safety, the environmental management as well as the observance of the Group's Code of Conduct and the Personal Data Protection Policy.

The Code of Conduct is the basic framework of principles and values that must characterize, among others, the suppliers, subcontractors, and partners of the Group to maintain transparent and responsible business relationships.

The above framework is a necessary condition for the proper and safe operation of the supply chain and the safe execution of all operations. For 2021, 76.56% of our main suppliers / subcontractors were EN ISO 14001 certified.



5.3 Emergency preparedness – Business continuity

Emergency preparedness is a matter of primary importance for the TERNA ENERGY Group. Recognizing that its activities may pose serious risks to employees, as well as those who visit its facilities and construction sites, it ensures the timely planning of measures to address them. Actions to mitigate and address actual and potential negative impacts, as well as actions to enhance actual and potential positive impacts on the issue of emergency preparedness are described in more detail below.

In order to enhance its preparedness in emergency situations, the Group sets targets, the progress of which is evaluated on an annual basis. Particularly:



Business continuity plan

Demonstrating a reflexive response rate, the Group immediately implemented the integrated Business Continuity Plan during the COVID-19 pandemic. The Plan includes strict operating rules, and its implementation is monitored daily by a special working group that has been set up to deal with the pandemic and in which the executives of the Group participate, as well as specialized scientific collaborators.

In the context of the Plan, a program of remote work was implemented, for significant number of employees as well as a rotating program of work for those who need to be in the Group's buildings and facilities. Special care was given to parents of minor children and those who need increased attention and care. Extremely strict operating rules have been adopted at all points of presence and operation in Greece and abroad, to ensure the maximum possible level of safety for everyone, being in constant contact with all competent bodies.

Emergency response plan

At TERNA ENERGY, any emergency, natural and / or man-made (e.g., fire, explosion, heatwave, flood, earthquake, terrorist act, uncontrolled leakage and failure of materials and / or equipment) requires immediate, comprehensive and effective handling, since it is a crisis event where people and associates of the Group are put in danger.

Prior to the construction of a project or operation of an installation, the Group prepares a detailed Emergency Management Plan, describing the direct and indirect actions that must be carried out, as well as the appropriate resources that each installation should have for effective emergency planning.

Emergency drills

The Group caters to the preparedness level of its employees and associates (subcontractors) in emergency situations and for this reason regularly carries out readiness drills, by conducting critical events simulations (employee accident, fire, earthquake etc.) concerning the timely and effective reaction of those present at the workplaces and facilities of the Group's activities, to incidents that may adversely affect health, safety, and the environment.

Through the readiness exercises, the following are checked and evaluated:



Adequacy of plans and procedures.



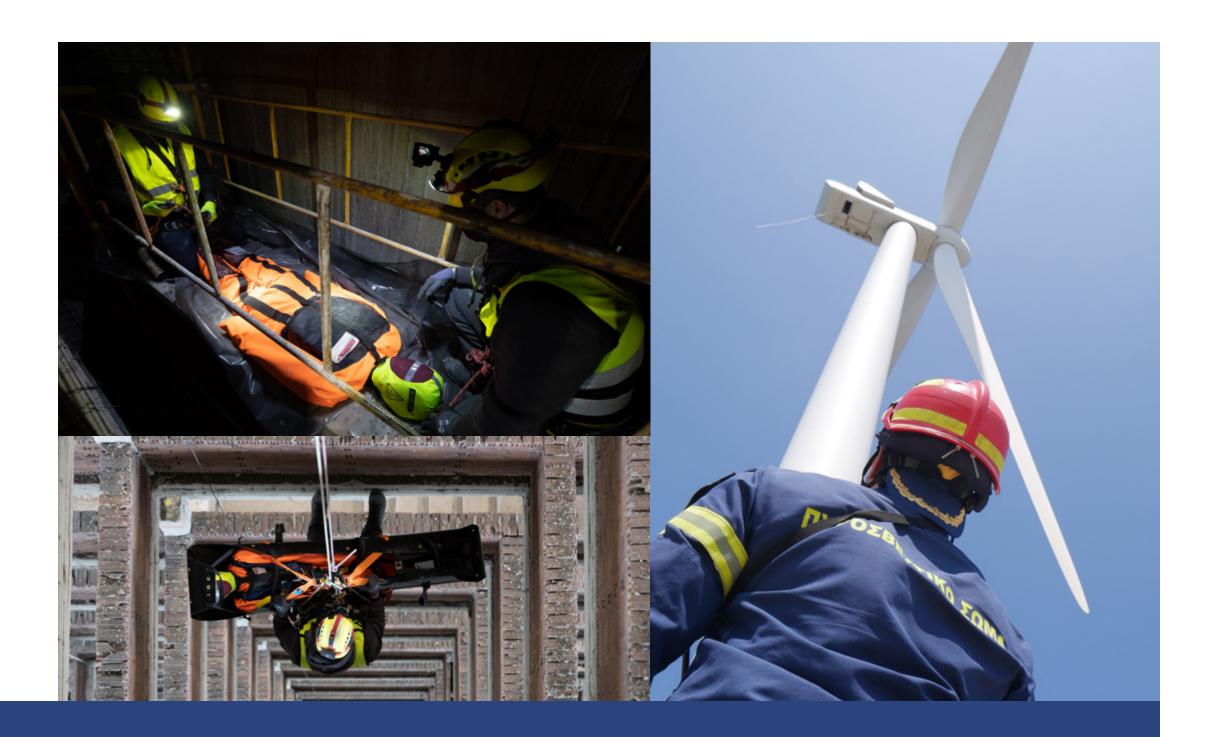
Cooperation
and response
of involved departments,
authorities, entities
and personnel.



Any oversights in the involved people's roles and responsibilities.



Necessary resources.



TERNA ENERGY Indicator

In 2021, a total of 15 emergency preparedness exercises were successfully carried out by the Group companies. The execution of the exercises revealed the high degree of readiness - reaction of staff, corrected weaknesses/errors identified during the exercise phase and improved the safety culture of the Group employees.

15
emergency preparedness
exercises

Employee training

Within the framework of the Emergency Response Plan, the provision of the necessary knowledge and training for the active participation of employees on the issues of emergency preparedness is also provided. The Group caters for the continuous update and training of its employees in relevant issues, in order to be able to protect themselves, their colleagues and associates, as well as the environment by recognizing, recording / communicating and reducing possible causes of accidents.

Educational activities and programs are organized and conducted to:

Enhance

the readiness levels of employees.

Further develop

their skills and intensify their technical competence, with the ultimate goal of protecting themselves and the environment in which they work.

Integrate

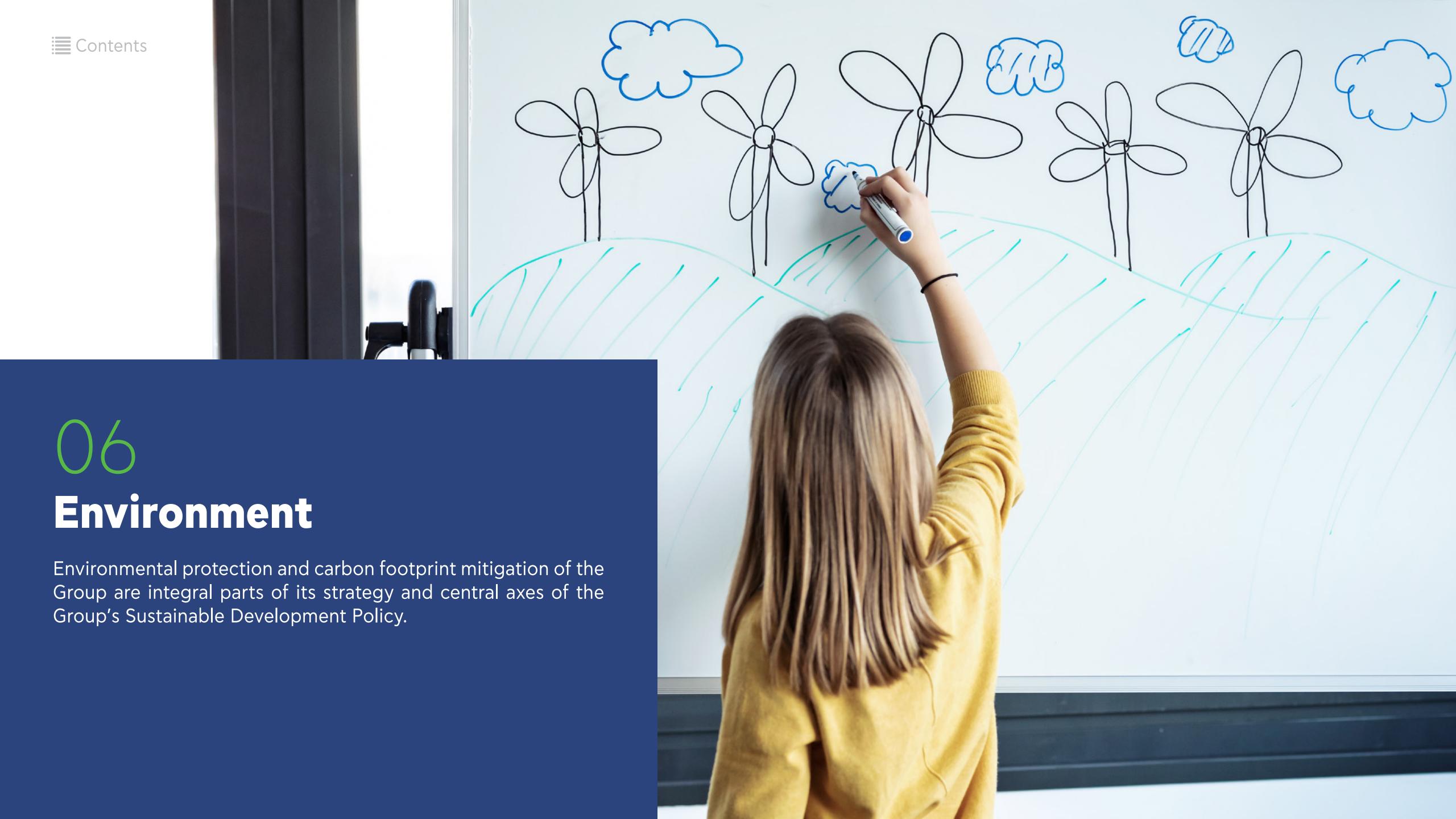
the knowledge acquired from past incidents and their handling in the content of the educational programs.

Analyze

the ways of improving the response in the event of the recurrence of similar incidents.

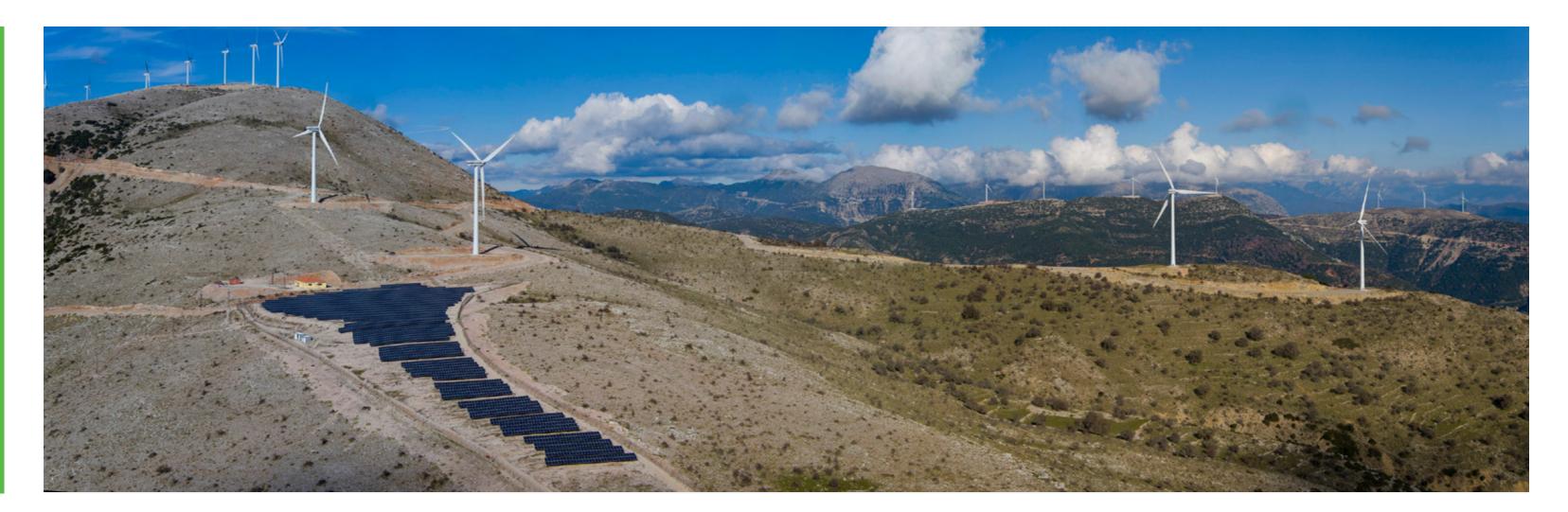


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The protection of the environment and the reduction of the environmental footprint of TERNA ENERGY Group, in Greece and abroad, is an integral part of our strategy and one of the axes on which the Group focuses in accordance with the Sustainable Development Policy. In this section, the material topics that emerged and constitute as strategic pillars for TERNA ENERGY are the following:







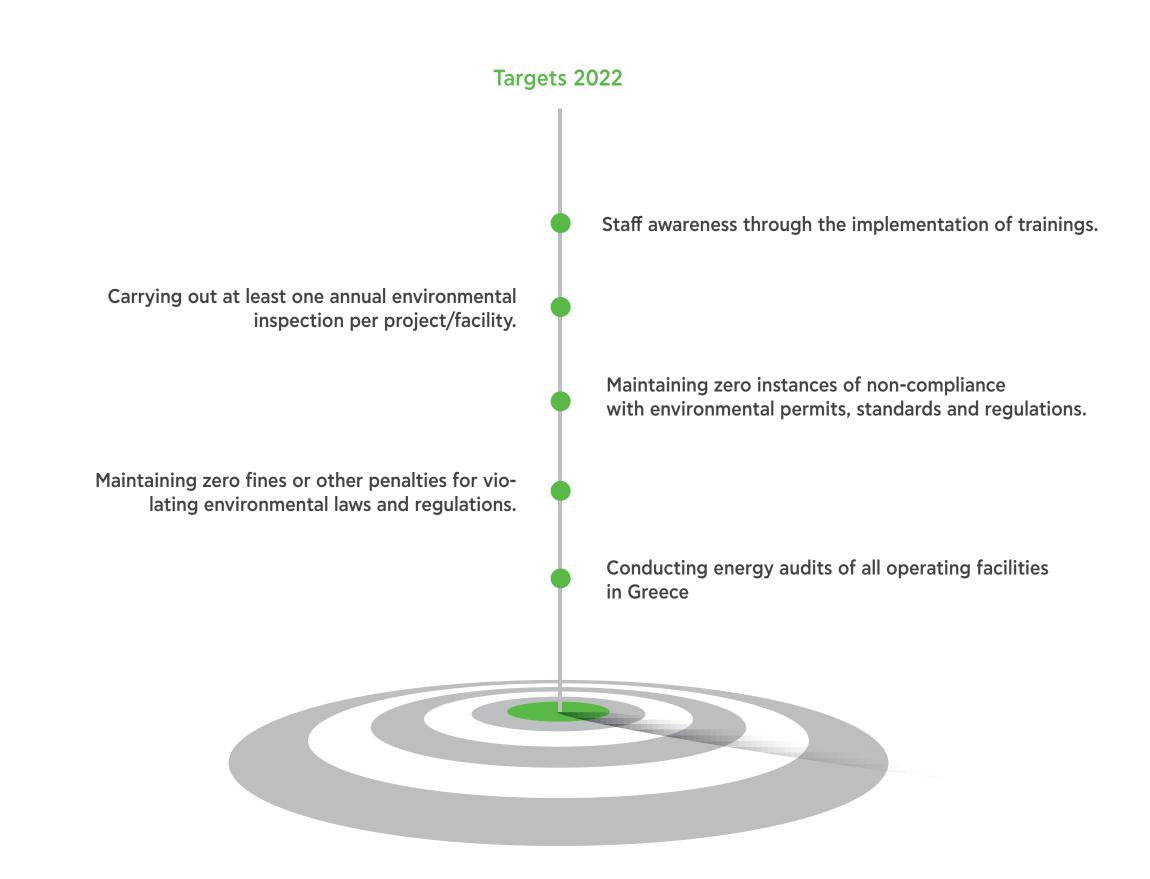


Environmental and energy strategy

The environmental and energy strategy of the Group includes:



To strengthen its Environmental and Energy Management System, the Group sets targets, the progress of which is evaluated on an annual basis. Specifically:



Environmental and energy management

By implementing a modern and integrated Environmental and Energy Management System, the Group recognizes, in a timely manner, the environmental impacts of its activities and is therefore able to take the necessary precautionary measures, to reduce its environmental and energy footprint and improve its environmental performance.

The Group's strategy for reducing its environmental impact is based on the following cycle:



Saving natural resources

through reuse and

recycling of materials

The Environmental and Energy Management System is certified according to the international ISO 14001: 2015 and ISO 9001:2015 standards. In addition, TERNA ENERGY is certified according to the international ISO 50001: 2018 standard since 2019 and applies a horizontal energy management system across all its projects and facilities.

Environmental and energy management system audits

TERNA ENERGY Group conducts annual internal audits in all its operational activities to ensure compliance with the approved environmental conditions, as they apply per installation / operational activity, the requirements of the legal and special requirements that apply in each case, as well as the requirements as defined in the procedures of the environmental management system. In 2021, 41 internal audits were carried out for all facilities in Greece.

Internal audits aim at:

✓	Assessment of the degree of compliance with the requirements of current legislation.
✓	Evaluation of the degree of response to the requirements of the Group's customers.
✓	Evaluation of the degree of compliance with the requirements of the Environmental and Energy Management Systems of the Group companies.
✓	Assessment of the degree of compliance with the requirements of the international standards ISO that the Group applies.
✓	Identification of points that need improvement and reinforcement.
✓	Improvement of the implementation of Management and Risk Management Systems.

It is also noted that in April 2021 the Group Certification process was completed by the Certification Body for the ISO 14001 standard, which resulted in the issuance of compliance certificates for all TERNA ENERGY Group subsidiaries.

It is worth mentioning that the Group, achieving its goal for 2021, proceeded to implement a Community Eco-Management and Audit Scheme in accordance with the EMAS Regulation 1221/2009 (as amended by 1505/2017).

Environmental and energy training of employees

Cultivating a broader environmental culture is a prerequisite for better management of both environmental issues and improvement of the overall energy footprint.

The Health, Safety, Environment and Energy Department (HSEE) of the Group, as well as the Environmental Officers of the projects, plan and implement trainings on an annual basis, both in environmental - energy and in social issues, to properly inform and systematically train the employees, who consider both the needs and requirements of the projects and the roles and tasks of the trainees. In 2021, 1,364 hours of training were held on Health, Safety, Environment and Energy.



GRI 2-27, 307-1

As a result of our efforts, during 2021, there were no incidents of non-compliance with environmental permits, standards or regulations. In addition, no fines or other penalties were imposed for violating environmental laws and regulations.



6.1 Our contribution to tackling climate change



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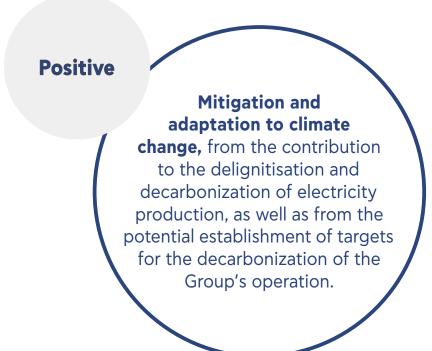
A-E1, A-E2, A-G3, SS-E1

OUR APPROACH

Impacts

TERNA ENERGY's operation creates or may create the following positive and negative impacts on the Climate:

Climate

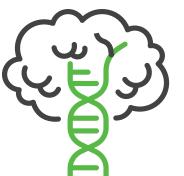


Negative

Impacts of business model on climate change, from direct and indirect consumption of energy from non-renewable sources, as well as from the potential absence of systems and procedures aimed at reducing energy consumption.

The contribution to mitigation and adaptation to climate change is the Group's greatest commitment to the most critical challenge in the world. The Group, in addition to its legal obligations, also considers it an ethical obligation to actively contribute to the efforts of the international community and our country, to combat and mitigate the effects of climate change (e.g., through the Paris Agreement, the Sustainable Development Goals, the Green Paper, the European Green Deal and the National Strategy for Adaptation to Climate Change).

The Group, through its business activity contributes to the mitigation of climate change, in the following ways:



of indirect greenhouse gas

emissions related to purchased

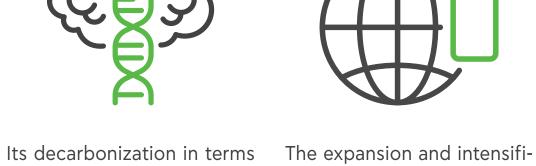
electricity (Scope 2). More

specifically, it commits to

use 100% green electricity

from 2021 onwards, in all fa-

cilities in Greece.





System, and alignment with

TCFD recommendations.

The contribution to global cation of the assessment of decarbonization, by increasrisks and opportunities, reing our installed capacity of renewable energy production lated to climate change, alto 3 GW by the end of 2025. ready performed within our **Environmental Management**

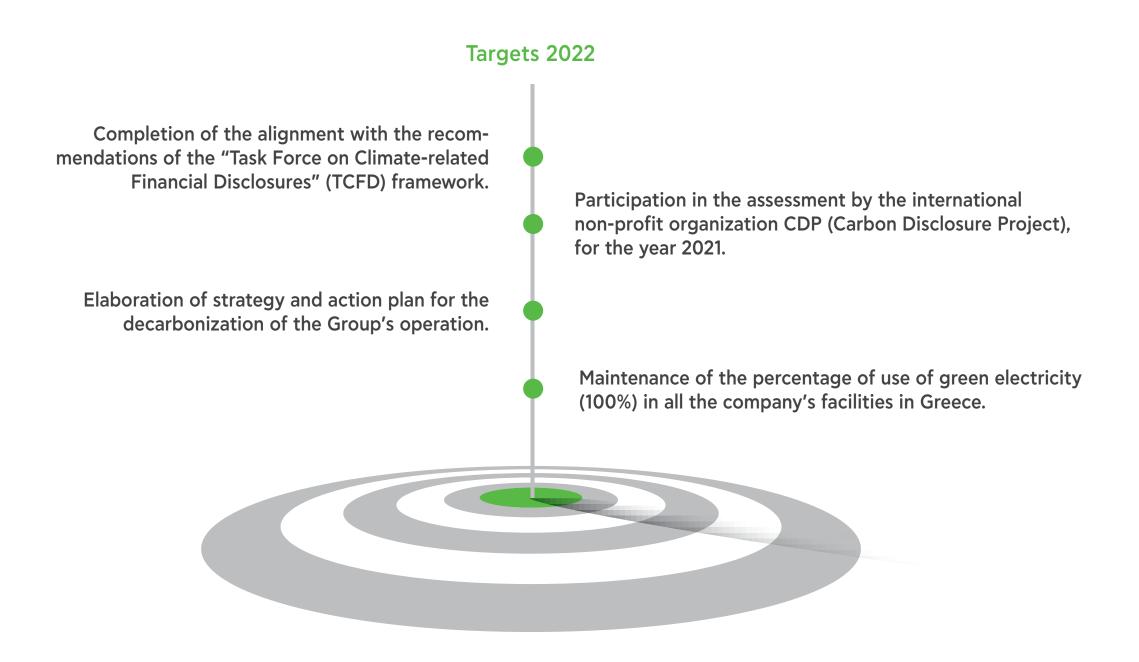


The acceleration of our investment plans in the field of energy storage, with the aim of contributing decisively to the maximization of the penetration of RES and the achievement of the Greek national energy and climate

goals.

Sustainable Development Report 2021 | 42 **TERNA ENERGY** | Environment

In order to strengthen its contribution to mitigation and adaptation to climate change, but also to reduce its environmental footprint, the TERNA ENERGY Group sets targets, the progress of which is evaluated on an annual basis. Specifically:



In the context of the strategic commitment of the parent company, the GEK TERNA Group, in relation to the mitigation of climate change, the selected key performance indicator (KPI) concerns the reduction of the intensity of greenhouse gas emissions from the GEK TERNA Group's activities in the field of electricity generation. The relevant target concerns the reduction of the KPI by 25% in 2025 (31/12/2025) compared to 2021 (base year).

The direct (Scope 1) and indirect (Scope 2) emissions of the TERNA ENERGY Group, as well as the MWh of energy produced, are taken into account for the calculation of the KPI.

On the date of publication of the performance indicator as for the year 2021 (30.06.2022), TERNA ENERGY Group has proceeded to obtain guarantees of origin for 5,748.85 MWh of consumed electricity, calculating the indirect (Scope 2) emissions (market-based) at 459 tn CO₂e.

After 30.06.2022, the TERNA ENERGY Group proceeded to purchase green certificates for an additional 437.7 MWh, which led to the recalculation of indirect (Scope 2) emissions (market-based) to 195 tn CO2e coming from electricity consumption abroad.

In the context of reducing the impact of its operation on climate change, the TERNA ENERGY Group began the process of calculating the indirect emissions of greenhouse gases, coming from its value chain in 2021. These emissions (Scope 3) relate to indirect emissions arising from activities related to the Group but arising from sources not owned or controlled by the Group itself, in accordance with the ISO 14064-1: 2018 and GHG Protocol Corporate Value Chain (Scope 3) Standard.

At the same time, the Group took the strategic decision to participate, for the first time, in the evaluation of the international non-profit organization, CDP (formerly Carbon Disclosure Project), through the «Climate Change» questionnaire in the summer of 2022 (for the year 2021). The CDP is an international non-profit organization that manages a global information and evaluation system on the impacts of companies, cities, and states on the climate, forests, and water security.

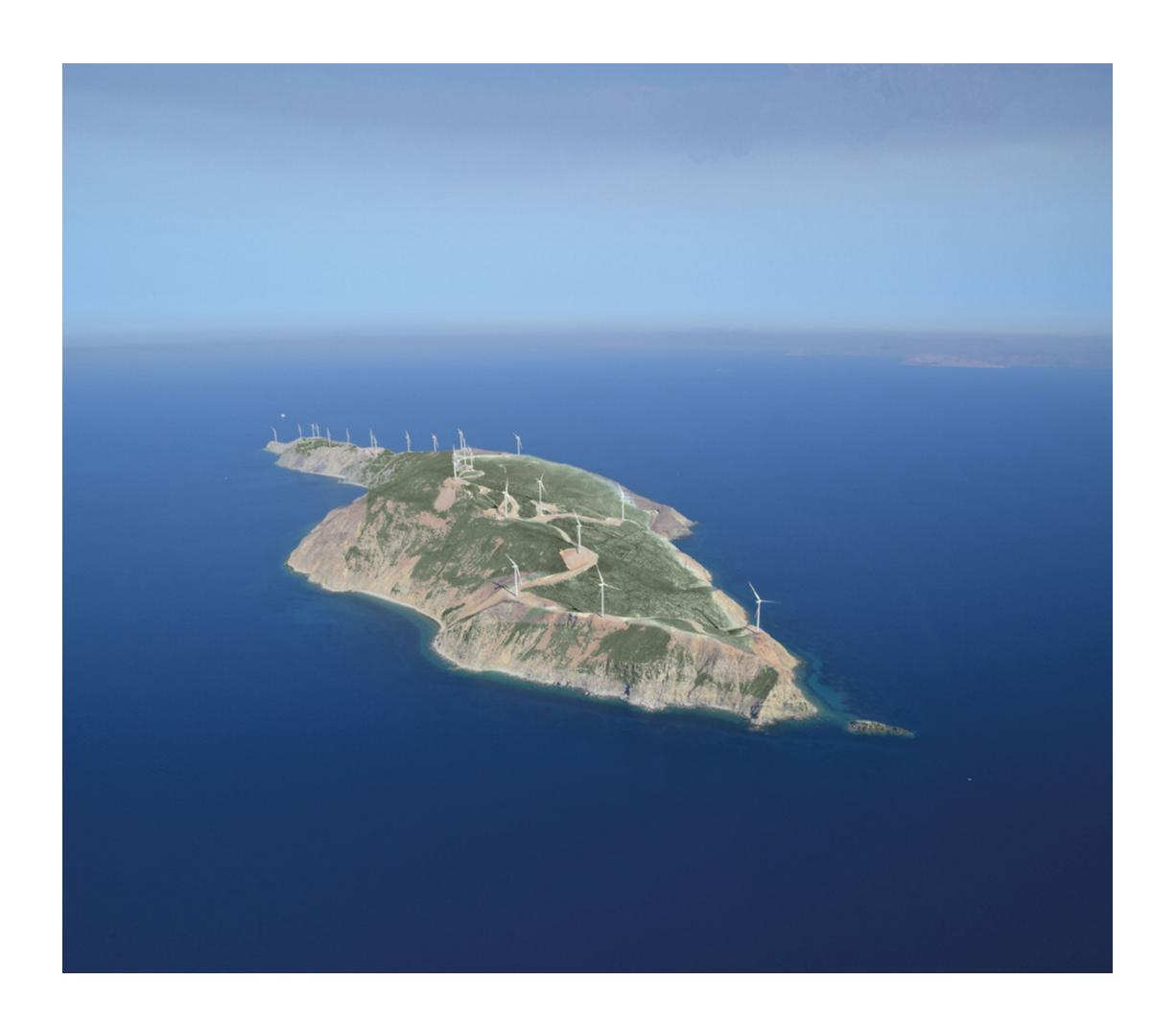


In the context of adaptation to climate change, TERNA ENERGY started the process of the identification and quality assessment of physical and transitional risks and opportunities arising from Climate Change in 2021, in line with the recommendations of the framework «Task Force on Climate-related Financial Disclosures» (TCFD).

Specifically, the Group has proceeded with:

- · setting organizational and operational boundaries,
- · identifying the potential transition and physical risks and opportunities,
- selecting and analyzing three climate scenarios: RCP 2.6 (Paris Aligned scenario), RCP 4.5 (Moderate overheating scenario), RCP 8.5 (Hot House scenario), and
- participating in a quality assessment of physical risks and opportunities, including the impacts of the identified risks and opportunities, for the three selected scenarios and over a period of 2023, 2030 and 2050.

The Group will publish the results from the calculation of physical and transition risks and opportunities arising from Climate Change and the methodology followed in the 2022 CDP Climate Change disclosure.

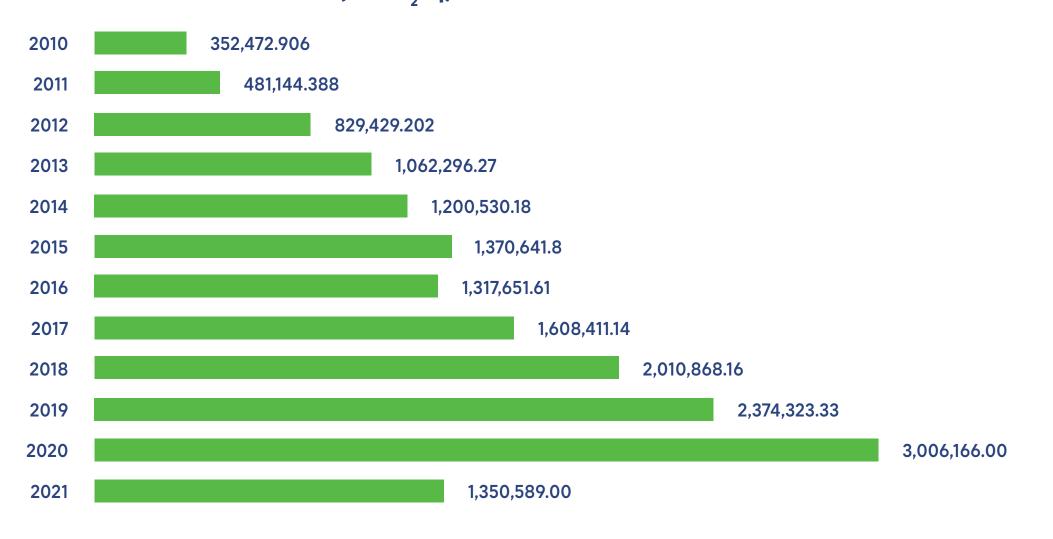


Greenhouse gas emissions

The Group's business model is strategically oriented towards tackling climate change. TERNA ENERGY, which is responsible for the Group's activity in clean energy production, helps to prevent the release of significant amounts of carbon dioxide emissions into the atmosphere every year. Furthermore, through its activity in Waste Management Units for the proper management of waste, TERNA ENERGY contributes to the prevention of methane emissions into the atmosphere, which are also harmful and contribute significantly to the greenhouse effect.

Typically, through TERNA ENERGY, which at the end of 2021 had an installed capacity of 895.26 MW, 2,284,254 MWh of clean energy were produced, preventing the release of 1,350,589 tn CO_9 e into the atmosphere.

Prevention of CO2 emissions (tn CO,eq)



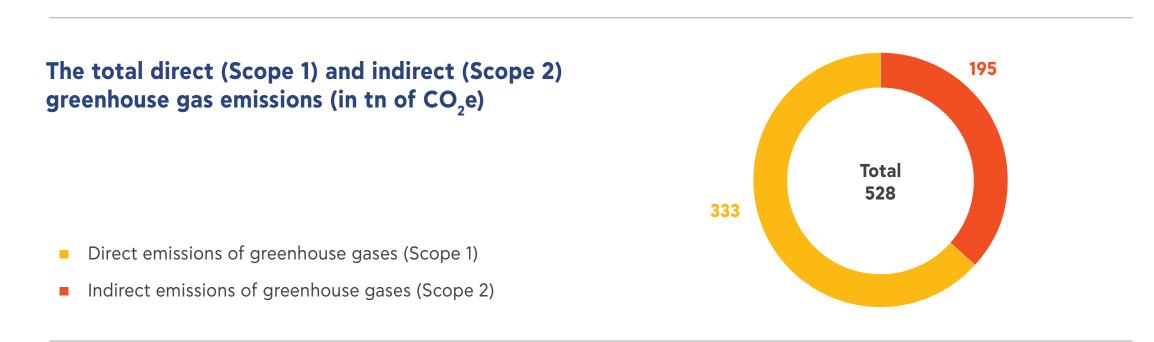


I. Direct and indirect greenhouse gas emissions (Scope 1, 2 & 3)

The Group systematically monitors the greenhouse gas emissions from its operation as an integral part of its environmental and energy policy and captures and communicates the impact of its activities through the electronic and printed media at its disposal (Sustainable Development Report, website, bulletins press, etc.), to all its stakeholders.

The calculation of the carbon footprint includes direct greenhouse gas emissions (Scope 1) resulting from the activities that take place within the Group's premises and the indirect greenhouse gas emissions from the consumption of electricity (Scope 2), such as those as defined based on ISO 14064-1: 2018 and the GHG Protocol - Corporate Standard. In 2021, the Group began calculating the indirect emissions (Scope 3) coming from its value chain for the first time, a process which was completed by proceeding with a voluntary verification of its total emissions by an accredited body in accordance with ISO 14064-3. The calculation of its total footprint will allow the Group to set specific and measurable improvement goals through initiatives that will concern the whole organization.

The total direct (Scope 1) and indirect (Scope 2) greenhouse gas emissions (in the following graph.



☐ Further information is available in the "Appendices- ESG performance indicators" Section.

The greenhouse gas emissions (Scope 2) from electricity consumption are calculated in two approaches, according to the GHG Protocol-Corporate Standard:

- The location-based approach, e.g., calculated using a national conversion rate of electricity consumption to greenhouse gas emissions; and
- The market-based approach, e.g., calculated based on a specific emissions factor by the electricity provider.

The following diagram shows the indirect greenhouse gas emissions (Scope 2) with the two different approaches (location-based emissions and market-based emissions).

Scope 2 market-based and location-based greenhouse gas emissions (in tn CO2e)

2021



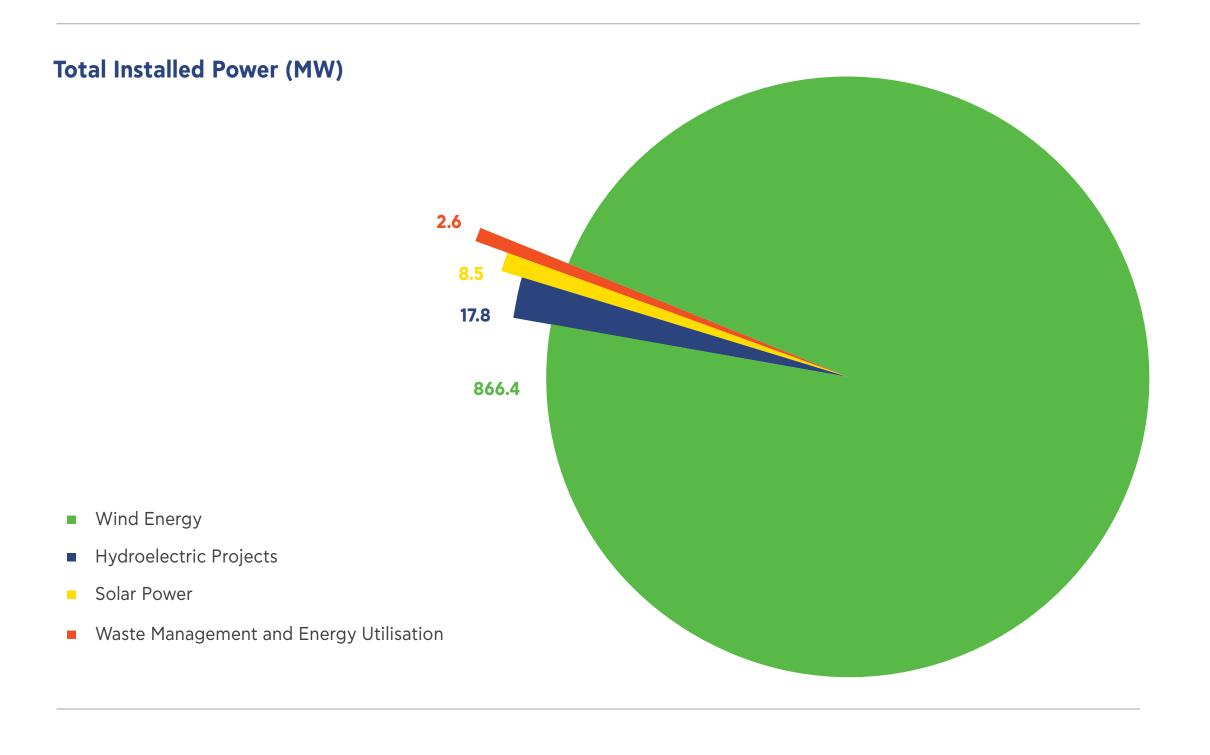
Further information is available in the "Appendices- ESG performance indicators" Section.



Responsible energy management

TERNA ENERGY is playing a leading role in the production of clean energy, while implementing pioneering environmental projects that contribute to sustainable development.

Allocating a wide portfolio of projects, the installed capacity per electricity generation sector is shown in the diagram below.

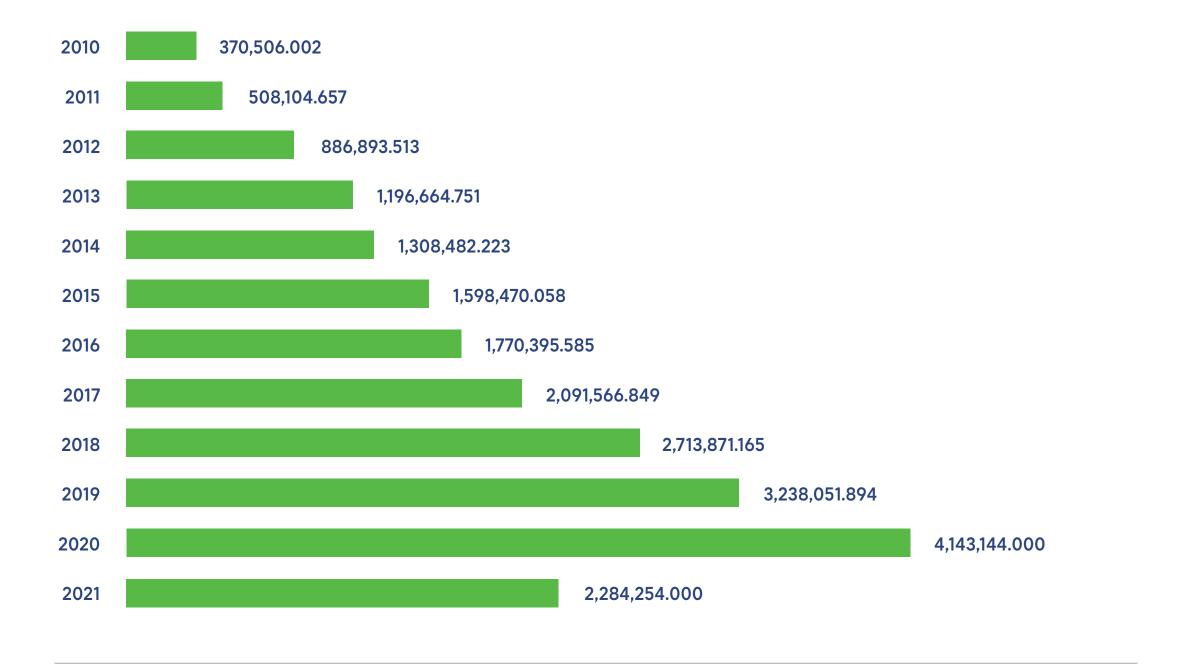




TERNA ENERGY Indicator

Total energy which is produced by the different technologies is shown year per year in the table below.

Electricity production from renewable energy sources (MWh)



Regarding its operation, TERNA ENERGY Group acknowledges that the only way to assess its energy needs and proceed to reduce the energy consumption of its activities is through the systematic recording and monitoring of energy consumption in offices and construction sites/facilities. In addition, the Group invests in the renewal and maintenance of its machinery, aiming to improve their energy efficiency and increase their lifespan. Through a series of energy saving actions, which began in 2021 and are expected to be completed in 2022, and which concern improvements in the lighting systems in wind and photovoltaic parks and in the biogas production unit in Thessaloniki, at a very low cost (less than € 5,000) the Group is estimated to save approximately 7,900 kWh per year.

☐ Further information is available in the "Appendices- ESG performance indicators" Section.



Products and services that contribute to decarbonization and reduction of energy consumption

The first long-term Power Purchase Agreements (PPAs) in Greece

In 2021, TERNA ENERGY and HERON were the first to introduce long-term Power Purchase Agreements (PPAs) into the Greek market. In this way, the two companies offer final consumers immediate access to green energy, providing the first MWhs in the market through "private" PPAs, thus opening the market of affordable electricity to both the industry and large commercial enterprises.

In this context, the first contracts were signed in 2021 with well-known industrial and commercial consumers. The offered PPAs are addressed to large commercial and industrial consumers and meet their needs for reducing energy supply costs and achieve Sustainable Development goals. They are in line with the objectives for the increase of the competitiveness of Greek enterprises, further penetration of RES in the country energy mix as well as the support of the development of new RES projects through bilateral commercial contracts with final consumers.

Issue of Guarantees of Origin

TERNA ENERGY provides, GEK TERNA Group business customers who desire it, with Guarantees of Origin. Guarantees of Origin or Green Certificates are issued by the Renewable Energy Sources Operator and Guarantees of Origin (DAPEEP), pursuant to Community Directives 2003/54 / EC and 2009/72 / EC and national legislation, in order to certify that a certain portion of electricity generation comes from RES. Electricity suppliers have the option of obtaining Green Certificates from RES generators and then canceling them on behalf of the companies and industries they represent.

Therefore, Guarantees of Origin are proof that a certain amount of electricity consumed in a business or industry, over a period of time, corresponds to an equivalent amount of energy from RES.

Through Green Certificates, both the Group, and the companies and industries that cooperate with it, contribute to the reduction of the carbon footprint of electricity generation. In 2021, TERNA ENERGY issued Guarantees of Origin for 1,515,924 MWh of electricity produced by RES.

Green services

In 2021, TERNA ENERGY, in collaboration with HERON, presented "HERON EN.A" to the Greek market, a pioneering, innovative program through which consumers gain significant energy independence, reducing or even zeroing, their electricity supply charge on an annual basis. Through this collaboration, the energy from existing and future photovoltaic and wind farms in Greece, will be committed to the customers of HERON who will participate in the program.



6.2 The protection of biodiversity and the preservation of local ecosystems



GRI

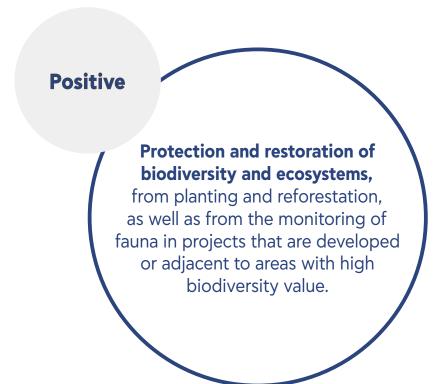
ATHEX ESG

OUR APPROACH

Impacts

The operation of the Group creates or may create the following positive and negative impacts on Biodiversity:

Biodiversity



Disruption of biodiversity and ecosystems, from the construction and operation of projects (e.g. RES, highways, etc.) in areas of high biodiversity and ecosystem interest, as well as from potential absence or potential incorrect implementation of policies and procedures for biodiversity protection.

The Group prioritizes the protection of biodiversity as it is a critical indicator for the balance of ecosystems and is of vital importance for the smooth operation of ecosystem services which are critical for the planet's survival, for example, e.g., pollination, climate control, flood protection, food and medicine production, etc. The Group contributes to the protection of biodiversity through a management system that ensures the enhancement of the positive and the reduction of the negative impacts that its operations create or may create on biodiversity and ecosystems.

For the protection of biodiversity, the TERNA ENERGY Group sets targets, the progress of which is evaluated on an annual basis. Particularly:



Part of the Group's activities (e.g., wind farm development) takes place within areas of high biodiversity value and for this reason it is necessary to implement initiatives and policies related to the protection and conservation of biodiversity.

In this direction, the Group implements certified systems, conducts trainings in its construction sites for its employees and visitors regarding the protection of biodiversity, undertakes initiatives for the promotion and protection of local ecosystems and constantly ensures that it operates beyond the provided environmental legislation, using mechanisms to monitor and record its impacts on the wider natural environment.

Operations adapted to the needs of ecosystems

The Group, during both the construction and the operation phase of its projects (e.g., RES projects), prepares, in collaboration with specialized scientists and bodies, Environmental Impact Studies (EIA), Special Ecological Assessment Studies (EA), Special Ornithological Studies (SOS), as well as monitoring programs aimed at obtaining and utilizing the necessary information to ensure the protection of local ecosystems, by taking appropriate protective and impact mitigation measures.

In particular, in order to ensure biodiversity and mitigate the negative impacts of the projects on the environment, the EIA and the relevant approved Environmental Conditions of the projects define measures to ensure the protection of ecosystems. Typical examples are planting projects, slope formations from the excess project excavation materials, projects to ensure the smooth flow of surface water, risk assessment studies to deal with the pollution which comes from possible leakage of hazardous liquid waste, elaboration of hydraulic studies which determine the measures for protection against erosion of the natural slopes of the wider project area, installation of automatic stations for measuring air pollution and winds, as well as sound protection projects of the neighboring area.

In addition, the construction of waste treatment plants, but also their operation through PPP schemes, such as for example the «SUSTAINABLE EPIRUS» and the « ENVIRONMENTAL PELOPONNESE», help to reduce the pollution of the above ground (lakes, rivers and seas) and underground (aquifer) natural environment, to improve the hygienic conditions for local communities and social groups exposed to the risk of waste and to strengthen the environmental and ecological consciousness of the citizens.

Projects' organization

In the context of responsible management of the impacts on biodiversity that may arise from the Group's activities, methods and technologies are adopted with the aim of protecting the natural ecosystems and the biological wealth of its areas of activity. In this direction, the Group implements the following:



- Investigation for the proper location of the projects and the required infrastructure as to whether it includes areas or parts thereof governed by particular regulatory restrictions based on the established land uses, the existence of Natura 2000 areas, as well as other protected areas.
- Environmental Impact Studies (EIA) and other studies preparation in accordance with the provisions resulting from the current international (where required) and national legislative framework.
- Implementation of a certified Environmental Management System (EMS) and training. More specifically, the certified, in accordance with the requirements of the international standard ISO 14001, environmental management system has been developed and communicated to all stakeholders involved in the supply chain (employees, partners, suppliers), while at the same time trainings are carried out for the Group's employees.
- Installation of birds protection systems in wind farms, where this is provided for by the decision approving environmental conditions.

In 2021, the installation of birds protection systems in the following wind farms was completed:

- **A/P "PERDIKOKOORIFI",** Municipality of Gortyna, P.E. Heraklion Crete Installation of 4 systems.
- **A/P "MYTOULA",** Municipality of Alexandroupolis, P.E. Evros Installation of 19 systems.
- A/P "DERVENI", Municipality of Alexandroupolis, P.E. Evros Installation of 8 systems.
- A/P "XIROVOUNI", Municipality of Alexandroupolis, P.E. Evros Installation of 3 systems.
- A/P "CHYLOS", Municipality of Alexandroupolis, P.E. Evros Installation of 2 systems.
- A/P "DIDYMOS LOFOS", Municipality of Alexandroupolis, P.E. Evros Installation of 3 systems.

The study for all the wind farms in the under-construction project, Karystia, is also in progress, as well as the study for the protection of the fauna in the waste management project under construction in the Region of the Peloponnese (MEA Skala Laconia).

The project "Integrated Waste Management of the Peloponnese Region with Public-Private Partnerships (PPPs) MEA - 3rd Subsection" is included in the protected area of the NATURA 2000 network which is designated as a Special Conservation Area (SCA) - proposed Site of Community Importance (SCI) Evrota Estuary, Vrontama region and Laconian gulf marine area" – GR2540003.

According to the findings of the Special Ecological Assessment study which was prepared for the project as part of its environmental licensing and updated in accordance with the conclusions, directions and proposed countermeasures of the prepared Conservation Objectives Study, it is not expected in any way to affect the integrity of the Natura 2000 GR2540003 area, as regards the occupation of the main project in habitat types and important flora species, due to the small area occupied by natural habitat types.

Additional Environmental Terms have been added and implemented for the MEA - 3rd Subsection, which ensure the protection of the habitats and species of the Natura area. The program of strict soil and water monitoring for potential pollution, both in the project area and downstream, as well as at the sources of Skala and Vassilo-potamou, as well as in the river Evrotas, the phytotechnical study for the green areas, the perimeter planting and the areas restoration, which will specialize the species of endemic flora found in the area, the investigation of the existing fauna (mammals, reptiles, birds) in the area of the project by specialist scientists, before and during construction, and their transport, if it arises, in the nearest habitats, the information - training of the workers about the possible effects on the environment from the construction works and from the operation of the project and the provision of instructions - directions to minimize the effects.

In the wind farm construction project in Kafireas, the wind farm installation areas are located within protected areas included in the Natura 2000 network, which is why increased protection and preparedness measures are observed, so that both during the construction and during the operation of the wind farms, the biodiversity of these areas is not endangered, and their disturbance is avoided in any way.

In addition, in the part of this project that is located within a Special Protection Area (SPA), all kinds of earthworks are not carried out, such as excavations, rocking and embankments within the SPA during the March - June breeding season.



Restoration of areas and construction sites

The Group ensures the minimization of the footprint of each of its activities through the environmental studies it prepares for all its projects as well as studies for restoring the natural environment and relevant action plans. According to the project permits, the restoration works take into consideration the existing natural biological wealth of the ecosystems which are adjacent to or within the areas where the Group operates.

The Group makes projections on the required environmental restoration cost of wind farm construction, magnesia mines and gravel sites following their exploitation. The amount of the relevant provisions on 31/12/21 amounted to €16,740.

In particular, regarding its wind energy projects, the Group makes specific provisions for the dismantling of the wind turbines from the Wind Parks and the restoration of the surrounding area. The forecasts are part of a broader and integrated restoration project design, which incorporates the recovery of significant quantities of raw materials and supplies, for their reuse in other recognized needs among the various activities of the Group.

In 2021, the Group carried out restoration, reforestation and regeneration works on 280 acres, planting 25,000 plants. Following the completion of the restoration works, they are approved by the Directorate of Forests through the Certificate of Works Completion.

RESTORATION

A/A	INSTALLATION	ACTIVITY	GEOGRAPHICAL AREA	WORKS	COMPETENT AUTHORITY	AREA (acres)	NUMBER OF PLANTS	PERIOD
1	Koskina Lakka	Wind Park	Euboea	Restoration	Aliveri Forest Office	21.36	5,085	11/2021-11/2024
2	Taratsa	Wind Park	Boeotia	Restoration	Thiva Forest Office	12.01	3,259	12/2021-12/2024
3	Vorina Litharia	Wind Park	Euboea	Restoration	Chalkida Forest Office	5.29	2,461	01/2020-01/2023
4	Kalogeriki Rachi	Wind Park	Euboea	Restoration	Chalkida Forest Office	29.13	4,233	01/2020-01/2023
5	Pyrgari - Dardiza	Wind Park	Euboea	Restoration	Aliveri Forest Office	17.06	7,335	12/2020-12/2023
6	Balcony	Wind Park	Euboea	Restoration	Aliveri Forest Office	25.85	7,511	12/2020-12/2024
7	Karampila	Wind Park	Euboea	Restoration	Aliveri Forest Office	20.92	6,871	12/2020-12/2023
8	Galosi	Wind Park	Euboea	Restoration	Aliveri Forest Office	30.37	8,959	12/2020-12/2023
9	Voureza	Wind Park	Euboea	Restoration	Aliveri Forest Office	8.73	1,623	12/2020-12/2023
10	Pyrgari II	Wind Park	Euboea	Restoration	Aliveri Forest Office	3.26	1,874	12/2020-12/2023
11	Agriaxhladia	Wind Park	Euboea	Restoration	Aliveri Forest Office	20.24	6,138	12/2020-12/2024
12	Mesokipi	Wind Park	Euboea	Restoration	Aliveri Forest Office	16.07	4,329	12/2020-12/2024

REFORESTATION

A/A	INSTALLATION	ACTIVITY	GEOGRAPHICAL AREA	WORKS	COMPETENT AUTHORITY	AREA (acres)	NUMBER OF PLANTS	PERIOD
1	Rachoula	Wind Park	Boeotia	Reforestation in Trepia, Municipality of Tanagra	Forest Directorate of Boeotia	17.24	1,434	2020-2023
2	Mavroplagia - Kastro	Wind Park	Boeotia	Reforestation in Trepia, Municipality of Tanagra	Forest Directorate of Boeotia	93.18	8,900	2020-2023
3	Plagia-Psiloma	Wind Park	Boeotia	Reforestation in Trepia, Municipality of Tanagra	Forest Directorate of Boeotia	55.26	5,155	2020-2023
4	Eressos	Wind Park	Macedonia	Reforestation at the Mavrorachi Landfill Site of the Municipality of Lagada, Thessaloniki	Forest Directorate of C. Macedonia	170	37,500	2018-2021
5	Lefkes	Wind Park	Macedonia	Reforestation in Potami, Municipality of Eordea, Kozani Prefecture	Forest Directorate of C. Macedonia	43	2,150	2019-2022
6	Lefkes	Wind Park	Macedonia	Reforestation in Agnanti, Municipality of Pylaia, Thessaloniki	Forest Directorate of C. Macedonia	18	3,600	2019-2022
7	Taratsa	Wind Park	Boeotia	Reforestation at Moschopodi, Municipality of Thebes	Forest Directorate of Boeotia	108.77	9,747	2020-2023

REGENERATIONS

A/A	INSTALLATION	ACTIVITY	GEOGRAPHICAL AREA	WORKS	COMPETENTAUTHORITY	AREA (acres)	PLANT NUMBER	PERIOD
1	Servounia	Wind Park	Euboea	Regeneration at the site of Platoma Gymnou, Municipality of Eretria (plantings and equipment of recreation area)	Forest Directorate of Euboea	144.5	3,125	2021-2026
2	Pyrgari-Ntardiza	Wind Park	Euboea	Regeneration of the area of Mesonisi, Municipality of Kymi (care of existing fauna and new plantings)	Forest Directorate of Euboea	90.02	1,018	2021-2026
3	Specific works A&b except Pyrgari-Ntardiza	Wind Park	Euboea	Regeneration of the area of Mesonisi, Municipality of Kymi (paving)	Forest Directorate of Euboea	2km		2021

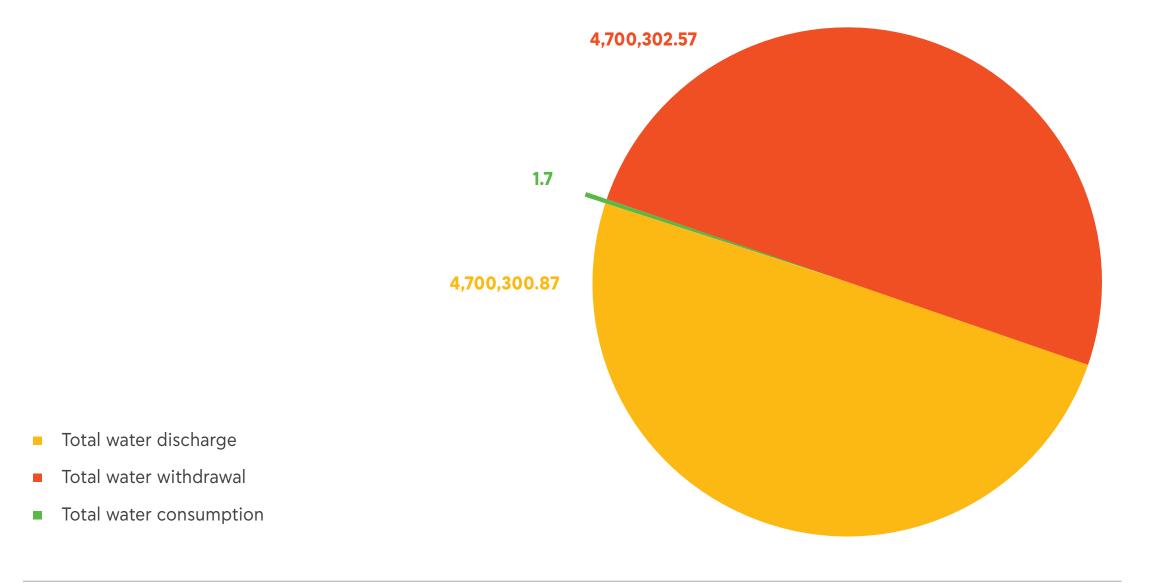


Water

The continuous monitoring and management of water is one of the Group's priorities in the context of energy production from hydroelectric plants.

More specifically, hydroelectric plants using surface flow preserve the continuous flow in rivers and do not interfere with ecological flows. At the same time, emphasis is placed on the rational use of water used in the production process, as well as for the hygiene needs of the Group's facility staff.

Water Management (ML)







6.3 **Soil**



ATHEX ESG

Positive

OUR APPROACH

Impacts

The operation of the Group creates or may create the following positive and negative impacts on the soil:

Soil



Preservation of natural reserves of raw materials, from the recovery and production of recyclable materials in waste management units as well as from the possible selection of materials

with a low environmental footprint.

Soil pollution, from land

Negative

use change, management of solid waste, liquid effluents and released air pollutants, as well as from possible vandalism, damage (e.g., to photovoltaic parks or other equipment), resulting in the burden on the soil.

Depletion of natural reserves of raw materials,

from the use of materials (e.g., concrete, aggregates, plastic, metal, chemicals) derived from non-renewable raw materials.

The circular waste management and the maintenance of the natural reserves of raw materials is important in terms of soil protection, both at the Group level, as well as at the national and global level. In this context, the Group ensures the separation of waste generated from its activities at source and their maximum utilization. This material topic impacts all stages of the Group's value chain.

For the responsible management of the waste and the preservation of raw materials, the Group has set objectives, the progress of which is evaluated on an annual basis. In particular, the targets for 2022:



Waste management projects development

To mitigate the problem of waste management and promote a circular economy, the Group invests in developing advanced Public Private Partnerships (PPPs) waste management projects in the Region of Epirus and the Peloponnese Region. The Waste Management Unit of Epirus is in commercial operation and has an operating horizon of 25 years. In 2021, the construction of the Peloponnese PPP project entered into force and works began.

The Waste Treatment Plant of Epirus (WTP EPIRUS) completed two years of full twelve months of operation, having been put into operation in 2019. With the WTP of EPIRUS, a significant element of the Regional Waste Management Plan (RWMP) of the Region of Epirus is implemented, in accordance with the National Waste Management Plan (NWP) and European legislation. The maximum annual capacity of WTP EPIRUS is 105,000 tons, through which a total recovery of at least 17,000 tons of recyclable materials per year is achieved.

During the year 2021, the construction works of the project «Integrated Waste Management of the Peloponnese Region» began, which provides for the construction and operation of three (3) Waste Treatment Plants (WTP) and an equal number of Landfills in Arcadia, Messinia and Laconia, as well as two (2) Waste Transfer Stations (WTS) in Corinthia and Argolida. This is the largest waste management PPP project in the country, which implements the largest part of the Regional Waste Management Plan (RWMP) of the Peloponnese, while it operates in parallel and complementary to the Local Recycling Plans at the source of the Municipalities. According to its design, it will produce green energy and as a result it will be an environmental infrastructure with a zero-energy footprint. It is also planned to reduce the cost of waste management for municipalities while preventing the possibility of fines.

The operation of these Units contributes to the fight against the chronic problem of waste management in Greece, discharging local communities from significant volumes of municipal waste and maximizing the life cycle of landfills. At the same time, it contributes to the conservation of natural resources and materials, through the recovery of recyclable materials.



Cooperation with licensed bodies

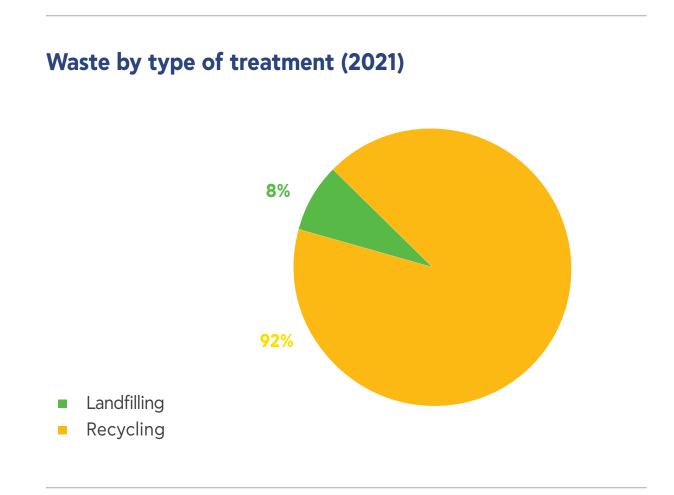
The Group cooperates only with licensed bodies for the collection, recovery, treatment, reuse and / or disposal of its waste. With the adoption of the circular economy principles, significant quantities of produced materials are reused (e.g., excavation, construction, and demolition materials) to meet the needs of other activities, between the Group companies and the different points of activity.



GRI 306-3, 306-4, 306-5 ATHEX ESG A-E3

Waste recording

For the proper evaluation and implementation of optimal waste management practices, the Group proceeds with the systematic and detailed recording of waste, by category (hazardous - non-hazardous) and by type (lubricants, lamps, wood, paper, urban, etc.). In addition, the percentages of its waste disposal methods (e.g., reuse, recovery, and landfill) are recorded on an annual basis, for the long-term evaluation and monitoring of its performance. The percentages of waste (hazardous and non-hazardous) by type of treatment (%) for the reporting period are presented below:



☐ More information can be found in the "Appendices/ ESG Key Performance Indicators (KPIs)" Section.

Waste management

Regarding hazardous waste management, the Group's activities often produce waste with high concentrations of toxic substances, which makes them dangerous for the environment and public health. The Group plans and takes all necessary measures to eliminate the risk of potential natural environment pollution, such as, using certified UN-type barrels to ensure the safe transport of hazardous waste and the collection and storage of lubricating oils for equipment use.

Reuse and recovery

The materials and raw materials procured by the Group play a catalytic role for the quality of the projects it delivers as well as for the size of its environmental and energy footprint. The Group takes care to select materials and raw materials that will be able to function even during adverse, intense weather conditions. The adoption of circular economy principles, through the methods of recovery and reuse of materials, allows the Group to reduce the use of natural resources while at the same time ensuring the durability of its infrastructures and their long-term sustainability.



Recycling

In all the offices and construction sites of the Group, a complete recycling system of paper, aluminum, glass, plastic, electronic and electrical equipment, lamps and batteries is applied, with the use of special collection bins and in collaboration with special partners for the further disposal and reuse of collected recyclable materials. Particular emphasis is given to electrical and electronic equipment waste, which is recycled in certified units, where precious metals and materials are recovered and therefore dangerous leakage of heavy metals into the environment is prevented.

In 2021, of the approximately 40 tn of non-hazardous waste generated, 67% was recovered (recycling, preparation for reuse, other recovery methods) and 33% was directed to landfill.

Additionally, of the approximately 128 tn of hazardous waste generated, 100% was recovered (recycled, prepared for reuse, other recovery methods).

☐ More information can be found in the «Appendices/ ESG Key Performance Indicators (KPIs)» Section

Liquid waste

As with all types of waste, the reduction of the production of liquid waste and its rational and legal management, is a concern of TERNA ENERGY. The liquid waste produced by the company is separated into the municipal wastewater produced by the staff, the waste from the production process and Waste Lubricants and Oils, which are a separate category, due to their specificity.

Respecting the legislation and the particularities of each area, it minimizes the possibility of any liquid waste leakage through insurance safeguards, such as the creation of watertight septic cesspools where the units are not served by a sewerage network and the legislation allows (for urban wastewater), the construction or installation of prefabricated oil tanks and the measurements of the content of pollutants substances for other liquid waste.

In the event of a leak – environmental incident, absorbent materials are available at key points of the facilities and the work instructions, and the instructions of the environmental trainings are followed for the immediate control and restoration of both the proper operation of the units and the environment.

For the management of all the above and where required, there are contracts with licensed companies for the collection and management of wastewater, Waste Lubricating Oils or hazardous wastewater.

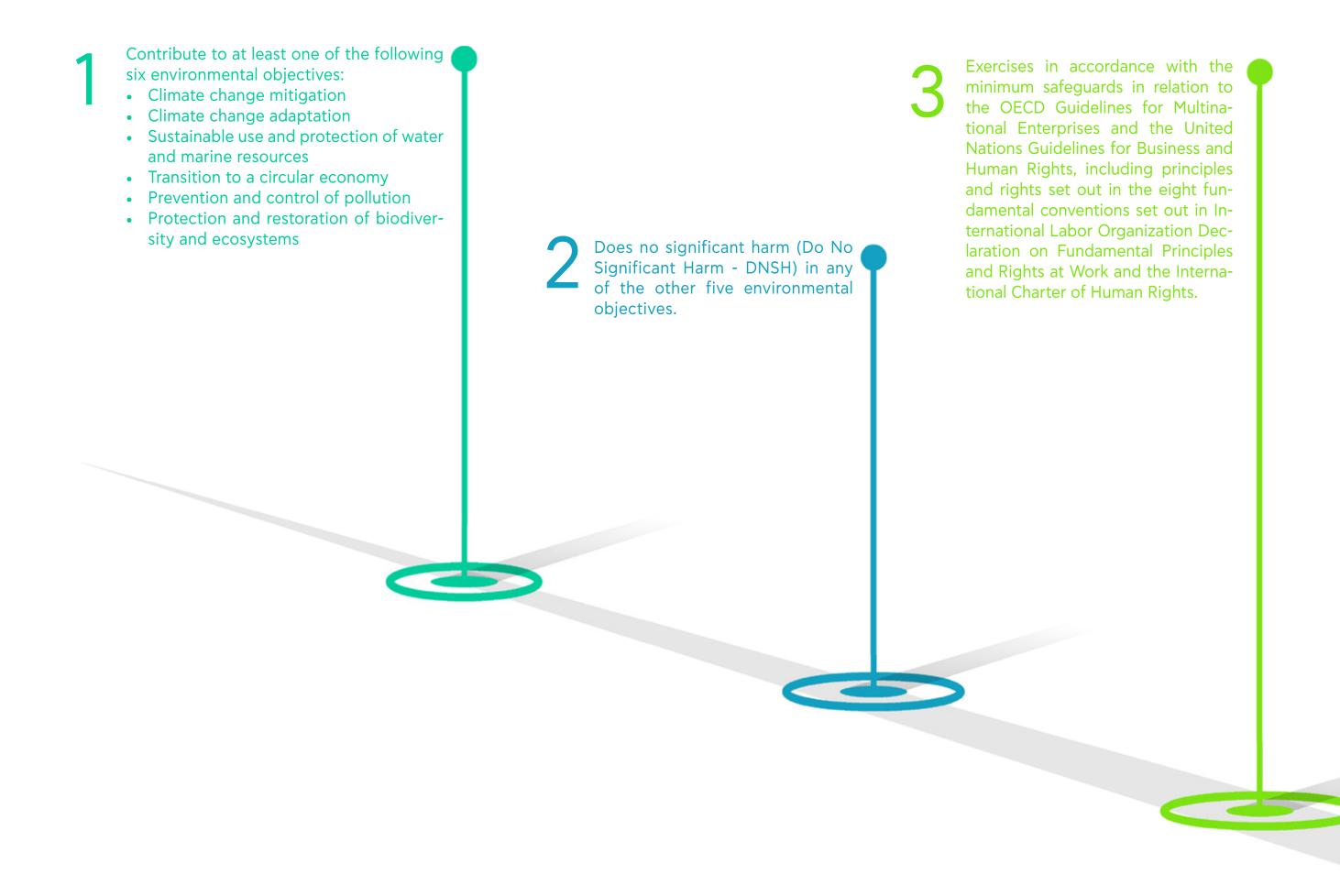
ATHEX ESG A-S1, SS-S10

6.4 Taxonomy Report

■ Taxonomy Regulation 2020/852/EU

The EU Taxonomy Regulation ("the Regulation") is one of the tools established under the European Green Deal, which aims to achieve the European Union's target of climate neutrality by 2050. The Regulation establishes the criteria for determining whether an economic activity is characterized as environmentally sustainable in order to determine the extent to which an investment is environmentally sustainable. The Regulation creates a common language that investors can use when investing in projects and economic activities that have a significant positive impact on the climate and the environment.

In order for an economic activity to be characterized as environmentally sustainable, it must:



Compliance with 2020/852/EU Regulation - Methodology and accounting policy

Article 8 (1) of Regulation 2020/852/EU provides that companies required to publish non-financial information (according to Directive 2013/34/EU) should disclose additional information on how and to what extent their activities are linked to environmentally sustainable economic activities, as defined by this Regulation.

More specifically, under the delegated Act 2021/2178 EU (Article 10, paragraph 2) for the disclosures that will take place in 2022 and concern the financial year 2021 (without the obligation of comparative information for 2020), the obligation to disclose the percentage of eligible and non – eligible activities arises for non-financial entities, in relation to the following key performance indicators:

- Turnover ("Turnover"),
- Capital expenditure ("CapEx"), and
- Operating expenditure ("OpEx"), on total turnover, capital and operating expenditure.

For the disclosures that will take place in 2023 and which will concern the financial year 2022, the obligations will be increased, as the companies will have to disclose -among other things- if their eligible financial activities are aligned with technical screening criteria of the Regulation.

Eligible economic activities

The eligible economic activities of the TERNA ENERGY Group for the financial year 2021 include:



a. Electricity generation using solar photovoltaic technology



b. Electricity generation from wind power



c. Electricity generation from hydropower



d. Electricity generation from bioenergy

	KPI	KPI	KPI
Economic activity	% Turnover	% Capital expenditure	% Operational expenditure
Eligible economic activities	54.94%	95.67%	13.86%
a. Electricity generation using solar photovoltaic technology	0.81%	1.14%	0.94%
b. Electricity generation from wind power	52.38%	92.68%	11.79%
c. Electricity generation from hydropower	1.35%	0.12%	0.83%
d. Electricity generation from bioenergy	0.40%	0.00%	0.30%
Non - eligible economic activities	45.06%	4.33%	86.14%
Total	100%	100%	100%



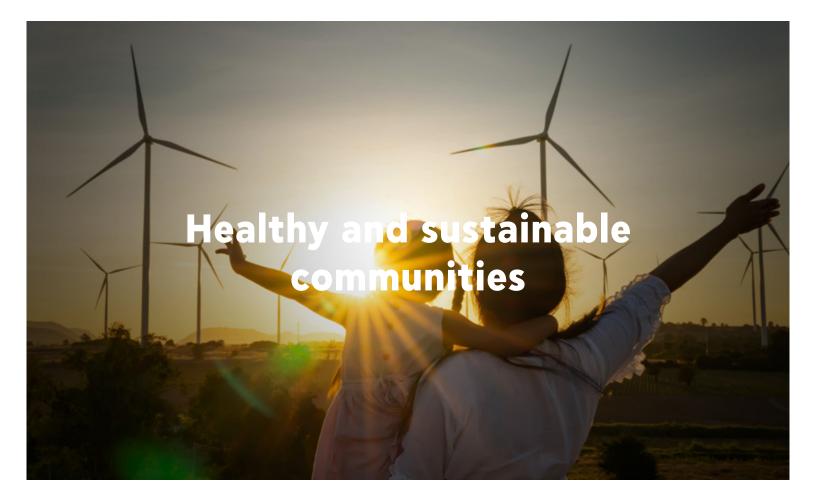


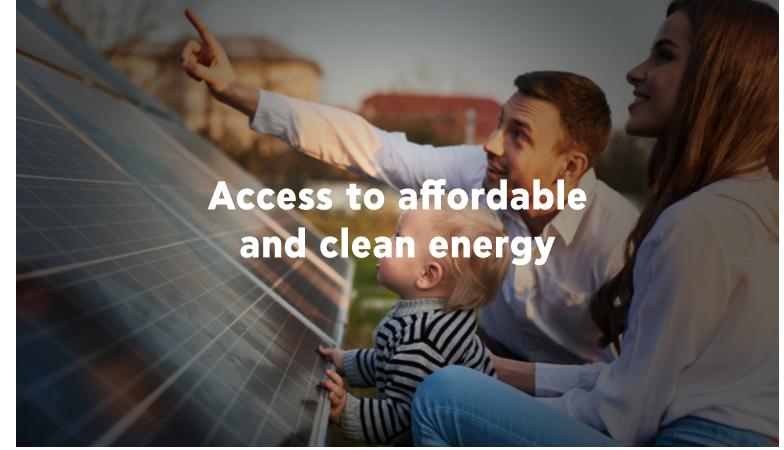
O7 People

TERNA ENERGY Group recognizes that through the potential of its human capital, can ensure the creation of direct and indirect economic value. Its people are a priority and a catalyst which produces added value in society through its activities.

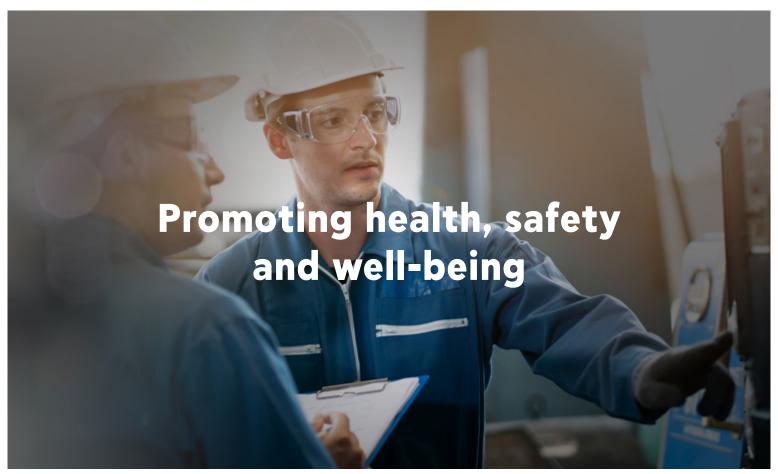


The promotion of human value is one of the axes on which the Group focuses in accordance with the Sustainable Development Policy. In the "People" section, the material topics related to its operation include:









The "Contribution to employment", "Contribution to employee training and development", "Human Rights" and "Indirect Economic Value" topics are matters of strategic importance and direction for the operation of the Group and its subsidiaries and are analyzed in this section. In particular, the topic "Indirect Economic Value" is analyzed in the section "Creation and distribution of direct and indirect economic value", while the rest of the topics are analyzed in separate sections.

7.1 Creation and distribution of direct and indirect economic value



ATHEX ESG

OUR APPROACH

Impacts

The operation of the Group creates or may create the following positive and negative impacts:

Direct and indirect economic value

Creation of direct economic value, from the timely payment of taxes, salaries, dividends, payments (e.g., sponsorships, social investments), as well as from the increase of the economic value produced by the Group from a potential turnover increase.

Positive

Creation of indirect economic value, from the creation of indirect jobs (employees of suppliers and external partners). From employee expenses, suppliers and partners in the wider economy, product and service markets. From withholding and payment of the RES fee (3% on sales) in favor of the local community, through discounts on

electricity bills and through payment

to the affected municipalities for

utility projects.

Potential reduced or negative direct economic value produced, from potential divestments in sectors of activity, as well as from possible reduced or negative direct value distributed in the wider Greek economy, due to delays in the implementation of the Group's investment plan

due to external parties.

Possible reduced or negative indirect economic value, from the potential reduced or negative direct economic value distributed, which indirectly affects stakeholder costs in the wider local community.

Negative

The creation and distribution of economic value is a priority of strategic importance for the TERNA ENERGY Group and all its stakeholders. Continuous engagement with local communities, helps the Group to establish long-term relationships of trust with its stakeholders.

For the evaluation of the actions taken to enhance the direct and indirect economic value, the Group for the first time sets targets, the progress of which will be evaluated on an annual basis. Particularly:



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Appendices



Group Investment activity 2021

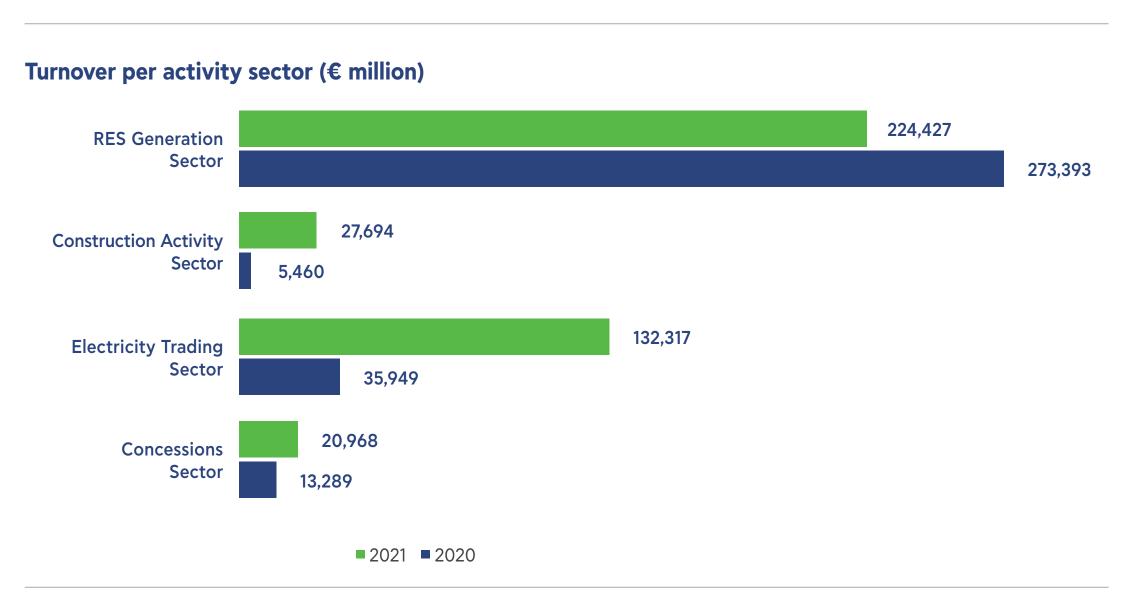
For yet another year, the Group continued with the smooth implementation of its investment program. On 31/12/2021, TERNA ENERGY Group's investments were € 217.4 million, whilst locally, within our country, they increased significantly, by 19.6%. The Group's ongoing investment activity creates the conditions for the stabilization of an increased flow of revenue and profitability on a long-term basis.

Among important events for the fiscal year 2021, the expansion of the Group's activities in the field of floating photovoltaic parks is highlighted. In this context, applications were submitted to the Regulatory Authority for Energy (RAE) for the granting of producer's certificates for three floating photovoltaic parks, the total capacity of which will amount to 265MW. The total amount of investment for the development of these projects will exceed 170 million euros. This new investment of the TERNA ENERGY Group is in addition to the investment program for the production and storage of clean energy that has already been announced and which concerns the development of wind farms and the implementation of energy storage projects with pumped storage in Greece.

In addition, during 2021, OCEAN WINDS (a joint venture of EDP Renewables and ENGIE) and the Group signed a cooperation agreement for the joint development of floating offshore wind farms in the Greek seas. In this way, the Group will be able to provide the Greek energy sector with the necessary sustainable energy to achieve the national energy targets. At the same time, value will be added to many sectors of the economy as new investments will be required in shipyards, network interconnections, ports and other sectors that will strengthen the national economy and create many direct and indirect jobs.

☐ Further information about the significant events for the fiscal year 2021 can be found in the Group's financial statements.

Indicative of the Group's efforts towards continuous growth is that the turnover has increased significantly and is presented in the chart below:



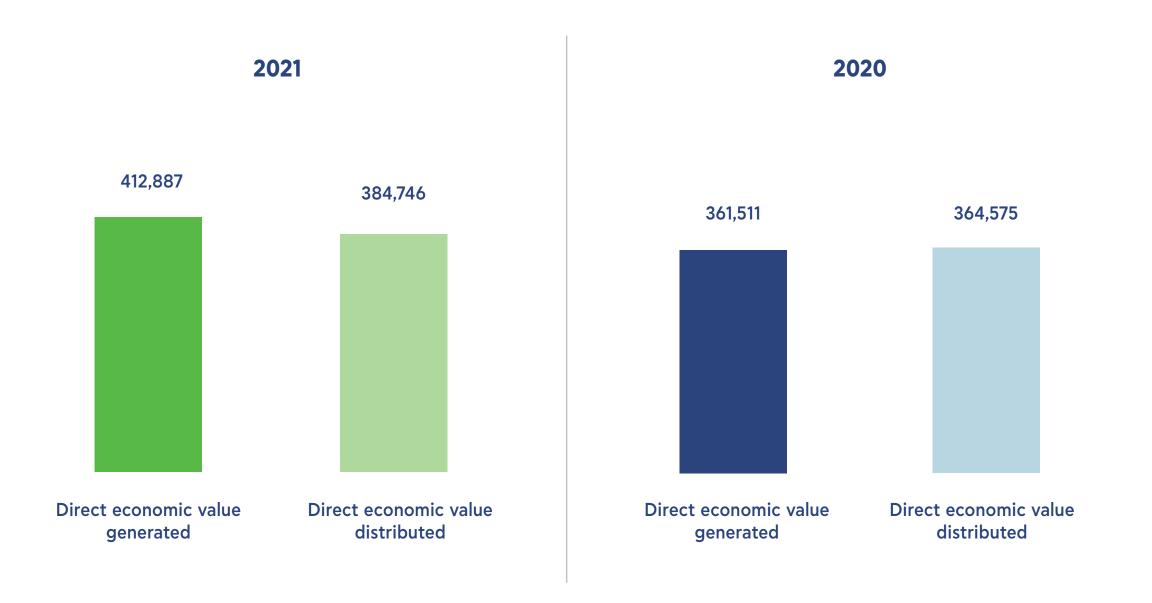
^{*}Data for 2020 have not been restated to exclude discontinued operations in the US.

There were no cancellations of operations related to impacts on society or the environment at TERNA ENERGY Group. There was a slight delay in the construction of the «Evangelismos» substation, in the project «Construction of 17 Wind parks» in the Municipality of Karystos, P.E. of Evia, the construction permit of which was suspended under no. 251/2021 decision of the Administrative Court of Appeal of Athens. This decision was revoked by no. 307 and 308/2021 judgments of the same Court published on 31 August 2021 and since then the work has continued as normal.

This upward trajectory of the Group helps to increase the value generated for all stakeholders.

The following diagrams show the direct economic value that was produced (revenues) and distributed (operating costs, employee wages and benefits, payments to providers of capital, payments / contributions to the state by country as well as investments in society) for 2021 and 2020.

Direct economic value generated and distributed (in thousands €)



[☐] Further information can be found in the Chapter «Appendices/ ESG Key Performance Indicators (KPIs)

Contribution to the country

Through its activity, the Group contributes directly to the tax revenues of the countries where it operates, through the payment of taxes, but also indirectly through the taxes paid by the suppliers and those self-employed with whom it cooperates.

Additionally, the environmental projects promoted by the Group, such as the pumped-storage projects, are estimated to create even greater domestic added value and secure numerous jobs in sectors (construction, steel, cement, etc.) important for the Greek economy.





Preference for local suppliers

Until today, the Group has developed its activity with a steady growth trajectory and with the possibility of expanding into new markets. Despite its marked globality, the Group consistently chooses to cooperate with local suppliers. In this way, it strengthens its direct and indirect socio-economic footprint throughout the supply chain, contributing to the creation of new indirect jobs, while enhancing social cohesion and prosperity.

The following table shows the percentage value of purchases by national and international suppliers as well as their related counterparts, in Greece and abroad:

TERMA ENERGY CROUP	2021	2020	
TERNA ENERGY GROUP	Percentage of purchase value	Percentage of purchase value	
National suppliers ¹	72.4%	83.1%	
International suppliers ²	25.4%	15.3%	
Related parties ³	2.2%	1.6%	
Total	100.0%	100.0%	

¹National suppliers are those that in the reporting period 2021 supply the Group companies and are located in the same territory (country).

²International suppliers are those who have supplied companies of the Group and are not located in the same territory (country). Only suppliers with a consolidated purchase amount in the period>€ 1,000 are counted. It is calculated algorithmically for the specific period.

³Related parties: as defined in IAS 24 «Related parties», IFRS Joint Ventures, associates and members of the BoD of the Group companies.

Further information can be found in the Chapter "Appendices/ ESG Key Performance Indicators (KPIs)



7.2 Healthy and sustainable communities



GRI 3-3

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OUR APPROACH

Impacts

The operation of the Group creates or may create the following positive and negative impacts:

Positive

Active contribution to the creation of resilient, sustainable, safe cities and communities, from social contribution actions, engagement with local communities on RES projects, the operation of waste management units as well as from the withholding and reimbursement of the RES fee to the local community.

Negative

Insufficient contribution
to the creation of resilient,
sustainable and safe communities,
from the impacts of the business
model on climate change, atmosphere,
water resources, soil, and other
environmental nuisances, as well as from
a possible failure in the implementation
of procedures and measures for the
health and safety of the local
community.

For the Group, actively contributing to the creation of resilient, sustainable, safe cities and communities is one of its most important priorities. The strengthening of our relations with local communities is achieved through a multidimensional approach, the aim of which is to create positive impacts in the Group's areas of activity.

Therefore, for the evaluation of the actions taken, the Group sets targets for the first time, the progress of which will be evaluated on an annual basis. Particularly:



Social support actions



The Group's social support program for 2021 exceeded €1,901 thousand, as compared to €429 thousand in 2020.

For 2021, the corporate social responsibility program focused on the construction of infrastructure projects that improve the daily life of the residents of local communities, the support of the National Health System, the financial support of cultural and sports clubs, the support of athletes, as well as the strengthening of the work of schools, authorities and local government bodies.

It is worth noting that in 2021, the implementation of the large donation for the conversion of the 115 Fighter Wing in Souda into a "green" installation began, covering its energy needs by 100% from Renewable Energy Sources.

In addition, during the last year, the Group stood by the side of the areas affected by the catastrophic forest fires, providing project machinery to both the Civil Protection and the Fire Brigade, supporting efforts to restore the areas. In addition, the Group proceeded with a series of sponsorship actions of direct support to professionals of the primary sector in the Municipality of Limni - Mantoudi - Agia Anna, undertaking the supply of feed to all livestock breeders of the Municipality affected and financial assistance to the forest cooperatives of the area for the cleaning operations.

In the field of culture and sports, among other actions, the Group sponsored events celebrating the 200-year anniversary of the Greek Revolution in the areas where it operates (Ioannina, Hydra) while it continued, for the fourth consecutive year, to support the alpine ski champion, Giannis Antoniou, by sponsoring his equipment.

Finally, and as the needs of the National Health System remain high, the program of strengthening hospitals and health centers in various regions of the country continued, both through the provision of equipment and through free construction works.



Responsible environmental action and local communities

The Group is in constant contact with local communities and authorities within its areas of activity to provide information to stakeholders, to identify potential grievances and concerns, as well as to implement its projects in a framework based on dialogue and transparency, so as to ensure business continuity and sustainability.

In this direction, the Group implements the relevant environmental impact studies for each of its projects, as well as continuous monitoring of their environmental footprint, conducts consultations and public information campaigns, where required during the implementation of the projects and publishes non-financial performance indicators of the environmental and social footprint of its projects annually, in the context of the Financial Statements and the Sustainable Development Report.

Operation of waste management units and improvement of quality of life

By investing in waste management, through the project in the Region of Epirus, multiple social benefits are created, such as the improvement of the quality of life of citizens, the creation of new direct and indirect jobs and the contribution to agriculture through advanced composting methods, which is a strategic goal of the country.

In the same direction, the waste management project of the Peloponnese Region will contribute to the reduction of the pollution of the above-ground (lakes, seas, rivers and air) and underground (aquifer) natural environment, thus improving the hygiene conditions of local communities and social groups exposed to the risks of unregulated waste disposal. The projects we are developing also contribute to strengthening the environmental and ecological awareness of citizens.

Respect and promotion of the cultural wealth of our areas of activity

Equally indicative of our strategy to ensure responsible relationships with the local communities in which we operate are our actions to highlight their cultural wealth. According to the environmental permit, at the construction stage of all projects and during the excavation works, in case of finding antiquities within the area of project development, the construction is suspended in order to conduct an archaeological excavation to assess the significance of the findings.

In addition to legislative requirements, regarding the preservation of antiquities within the scope of project construction, the Group is active in the wider area of project development with the aim of highlighting and promoting cultural heritage (anthropogenic environment). Acknowledging notions of sustainable and balanced environmental development, the Group continued its activity with cultural projects in the areas where it developed its investment program in previous years.

Cultural Activities Report

Municipality of Kymi - Aliveri

With the aim of further highlighting the monumental wealth in the municipality of Kymi - Aliveri, a multi-faceted map with the Medieval Monuments of the municipality was carried out in collaboration with the company of Euboean Studies (local branch of Aliveri). The map is a comprehensive effort to gather the monuments (60 the number) of the municipality in one location and at the same time, to guide visitors to their destination. The map incorporates new technologies such as the ability to browse electronically via a mobile application.

Acropolis of Dystos 2021

During the construction of its wind farms in Kymi Aliveri, Evia, the Group, in collaboration with the Ephorate of Antiquities of Evia, took the initiative to highlight the archaeological site of the Acropolis of Dystos. In this context, following the maintenance works of the forest road construction, the mapping of the entire archaeological site, the creation of a network of walking trails and the installation of supervisory material and direction signs in the castle premises took place. In 2021 the program continued with maintenance works of the paths (deforestation, laying of paving materials, etc.).

Underwater Archaeological Research of Kasos 2021

In 2021, the Group continued its sponsorship activity and support of the underwater archaeological research program on the island of Kassos. During the year 2021, the results of the research were presented both to the local community and to international scientific conferences.

The underwater research expedition to the sea area of the island of Kasos was carried out by the Ephorate of Underwater Antiquities of the Ministry of Culture and Sports, in collaboration with the Institute of Historical Research of the National Hellenic Research Foundation.

For the survey, a total of more than one hundred (100) group dives were performed, with more than two hundred (200) hours of individual bottom time. Four ancient shipwrecks were discovered, which date back to the Classical, Hellenistic, Roman and Modern periods.

The remains of the ancient shipwrecks consist of wine and / or oil amphorae from various production centers (Waldakivir, Tunisia, Mendi, Chalkidiki, etc.) and show that Kassos was a crossroads of civilizations over time, but also an important center of navigation from antiquity to modern times.



Archaeological Site of Plataea

The archaeological site of Plataea dominates at the foothills of Kithaironas in the municipality of Dervenochoria.

In the wider area of Dervenochoria, the Group has developed an extensive investment program with the installation of Wind Power Plants. The Group's sponsorship activity with the local community includes projects of a social nature and projects for the promotion of cultural heritage.

In 2021, at the archaeological site of Plataea, a material was laid out for the creation of a path as well as the installation of monitoring material.

7.3 Access to affordable and clean energy



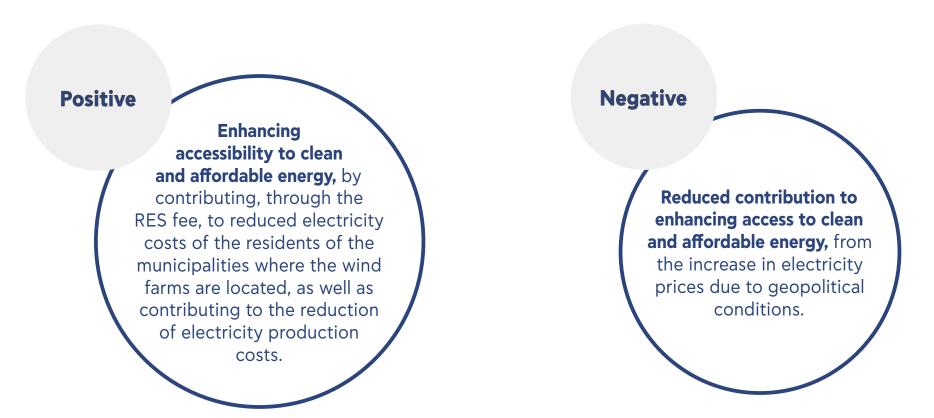
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OUR APPROACH

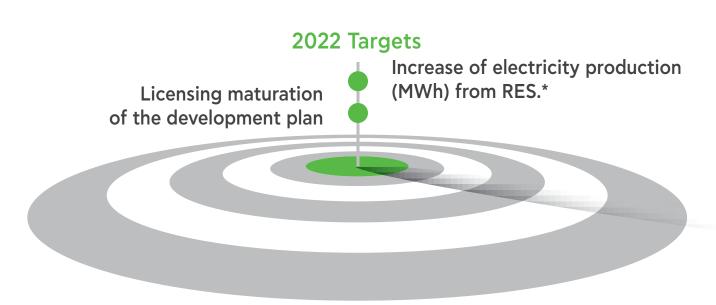
Impacts

The operation of the Group creates or may create the following positive and negative impacts:



The topic of enhancing accessibility to clean and affordable energy arose as material for the Group for the first time and underlines the importance of RES projects in reducing the cost of electricity production and eliminating imported fuels. This material issue is fully aligned with the Group's investment plan to increase the installed capacity to 6.4GW by 2029.

In order to evaluate the actions implemented, the Group sets targets, the progress of which will be evaluated on an annual basis. Particularly:



*Target to increase the production of electricity (MWh) from RES, as in 2021 the test operation of the company's 119MW wind farms built in Evia was completed and by 2022 they will be in commercial operation.

Reduction of electricity production costs

The development and operation of RES projects reduces the needs of electricity production from conventional energy sources and the release of polluting emissions into the atmosphere, while at the same time, they contribute to addressing energy shortage problems found in areas of the country.

At the same time, they also contribute significantly to the reduction of prices for the consumer. According to a survey conducted on behalf of the Hellenic Wind Energy Association (HWEA/ELETAEN), for every 10% of RES penetration in the system, the price for the consumer is reduced by 13,072 euros / MWh. Wind energy, according to the specific data, directly subsidized consumers by 760 million euro during the period October 2021 − March 2022, while in 2021, according to the same data, RES contributed to the reduction of prices by € 2.5 billion euro.

Compensatory benefits

The Group's activity in the development of RES projects and specifically wind farms and hydroelectric power generation projects, creates additional social benefits both directly, in the form of contributions and indirectly, in the form of discounts on the electricity bills of the residents of the local communities. In this context, 3% of the gross annual income from the operation of each wind and hydroelectric project as well as for the energy produced by the Waste Management and Biogas Production Units, is allocated to the local communities. Specifically, during the reporting period the amount of €5,634,702 was distributed to the municipalities hosting the operation of the Group's wind and hydroelectric projects.

7.4 Contribution to employment



OUR APPROACH

Contribution to employment is a material topic for the Group but also for the local communities in which it operates. The creation of new jobs, the provision of internship opportunities to young people in the Group companies, the utilization of human resources by the local community and the retention of employees are impacts of the Group that relate to its entire value chain.

For the evaluation of the actions taken to enhance employment, the Group sets targets, the progress of which will be evaluated on an annual basis. Particularly:





TERNA ENERGY | People

Employment in the Group

TERNA ENERGY Group offers a wide range of professional career opportunities through the development of its activities in Greece and abroad. To cover new jobs, priority is given to internal transfers/relocation as well as promotions/ progression of employees. New job positions are initially communicated internally to the employees of the Group companies, who can submit their application and participate as a matter of priority in the evaluation and selection process.

The Group's Recruitment Policy establishes the basis for the recruitment process, which is carried out based on objective criteria such as education, experience, professional profile, skills and competencies of employees. The Recruitment Policy provides, inter alia, that the decisions taken by the Group regarding recruitment are not related to any kind of discrimination regarding gender, nationality, language, religion, political beliefs, disabilities, sexual orientation of the employee or other elements of diversity.

The Group's Human Resources Department ensures the correct implementation of the Recruitment Policy and the law, regarding the age of the employees, the minimum wages, and the protection of diversity in its wider field of action.

Project development and new jobs

Filling new positions is also based on hiring new employees with special preference to employees from the local communities in which it operates.

The construction and operation of waste treatment plants significantly enhances local employment. For example, the construction of the PPP project "Integrated Waste Management of Peloponnese", has already created hundreds of new jobs during the construction period (estimated 800 throughout the construction period) while it is expected that 200 permanent jobs will be created during the period of operation as well as a large number of jobs in parallel.

Our areas of activity attract international investment interest, contributing to the creation of favorable conditions and further development of our activities in Greece and abroad. This allows us to constantly increase the volume and type of our activities and expand into new geographical areas, enhancing employment and the economic development of local communities. Indicatively, the project of the "Hybrid Power Plant of Amari, Rethymno" in Crete, which has received environmental approval, is estimated to create more than 1,000 jobs during the construction period.

In 2021

17
students completed
their internship
at the Group.

Enhancing youth employment

The Group recognizes that unemployment is a significant challenge that concerns the economy and social cohesion of the country. Investing in a better tomorrow, the Group gives importance to enhancing the employment of young people and creating professional prospects by implementing programs that aim to support their integration into the market. In this context, it provides the opportunity for internships to young people every year, bringing students closer to the market and offering hands- on experience on their subject matter. The Group maintains and expands collaborations with a number of University Institutions, in Greece and abroad, in order to be in contact with young people and to create employment opportunities, through respective programs per institution.



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Employee data

The Group monitors and records the total number of its employees by gender (women, men, other) on an annual basis and by type of contract (permanent or temporary employees) and type of employment (full time, part time, freelancers). In addition to direct employees, the Group records the data of workers who are not employees but whose work and / or workplace is controlled by the organization, e.g., all trainees and employees of third parties and employees of subcontractors. This number stood at 195 in 2021. The Group also records the total recruitment and exits of employees and monitors the rate of new hires and turnover (voluntary and non-voluntary) so that it can improve its Policies in relation to Human Resources.

The contracts of all employees follow, at a minimum, the legal framework. All employees with salary contracts with the Group in Greece are covered by the National Collective Bargaining Agreement. In addition, specialties whose work falls under a Collective Labor Agreement (e.g., Archaeologists) are also fully covered by the respective Agreement.

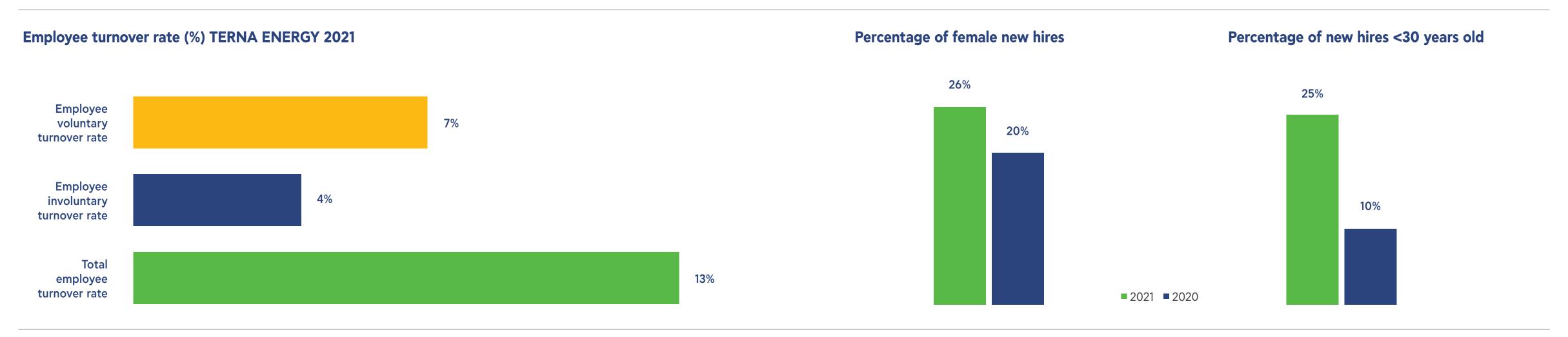












More information can be found in the Chapter "Appendices/ ESG Key Performance Indicators

*In the graphs above the percentages are presented rounded up.

Remuneration and benefits

The Group manages human resources issues impartially and ensures that every employee is treated fairly and without discrimination. More specifically, the Group ensures equal pay between men and women for the same position and leaves no room for discrimination or preferential treatment in terms of pay or benefits based on gender or other characteristics of the employee.

The Remuneration Committee is responsible for the Remuneration Policy applied to the members of the Board of Directors and the Senior Executives of the TERNA ENERGY Group. Within this framework, the Group operates with transparency and meritocracy regarding the provision of remuneration and benefits, applying objective criteria and evaluation indicators depending on the gravity of the role, roles and responsibilities of each position, educational background, experience, skills, the ability to achieve the objectives and the level of performance and efficiency of Senior Executives.

The Group, having examined the cost of living in the countries in which it operates, offers higher wages than the minimum ones set by the respective legal framework, proving its commitment to provide fair wages and a decent living. Most of the Group's employee remuneration is above the minimum statutory remuneration. In addition, the Group offers additional benefits, such as private group health and life insurance to all employees, corporate transport vehicles, laptops, corporate mobile phones, etc., depending on the needs and requirements of the position.

7.5 Contribution to employee training and development



OUR APPROACH

The growth of the TERNA ENERGY Group is owed to the ability of its people to plan and implement its business plan. The human capital of the Group is the driving force that actively contributes to the achievement of its vision, values, and culture. For this reason, the Group recognizes this effort and ensures the continuous development and retention of the talent which it employs and with which it collaborates.

In order to evaluate the actions taken to enhance the development and training, the Group sets targets, the progress of which is evaluated on an annual basis. Particularly:





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Training support practices

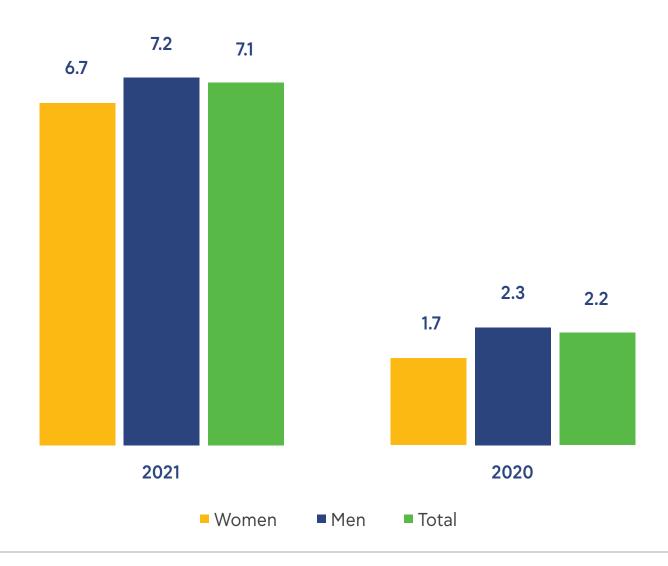
For TERNA ENERGY Group, it is vital to continuously improve the scientific and technical knowledge available to employees, to ensure their professionalism and improve their productivity.

In this context, the Group has established a series of practices to enhance education. Its purpose is to ensure the possibility of universal participation of employees in training activities, to promote a clear and understandable framework of processes for planning, implementation, and evaluation of training and over time, to achieve the development of skills and increase the productivity of human resources. To achieve this, the Human Resources Department cooperates with all the Departments, Teams, Construction sites and Facilities of the Group companies.

In this direction, specialized education and training programs are carried out, related to the specialization of each position, the strategic planning of the Group and the needs of human resources. On an annual basis, the educational needs of the Organization are determined, selecting the appropriate bodies and instructors and designing specialized programs for the training of our people, both at the technical level and at the level of professional skills. At the same time, each employee can propose training programs which, based on evaluation, are part of the Group's training plan.

During the reporting period, the Group provided a total of 518 employees with 3,672 training hours (Greece and abroad), compared to 2020, during which 415 employees received 910 training hours (Greece and abroad). The Group's performance in relation to this indicator (total employee training hours) improved by an increase of 304% compared to 2020.

Training hours per employee 2020-2021



☐ Further information can be found in the Chapter "Appendices/ ESG Key Performance Indicators (KPIs)

Employee evaluation and development

Evaluating the performance of employees plays an important role in their career, both professionally and personally. The Group implements is an evaluation process which includes the evaluation of quantitative and qualitative criteria which monitors the performance of employees in terms of their work productivity but also in terms of their behavior. The evaluation is carried out once per year for all employees in relation to the previous year. The Group is in the process of reviewing and assessing the evaluation system.



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OUR APPROACH

Impacts

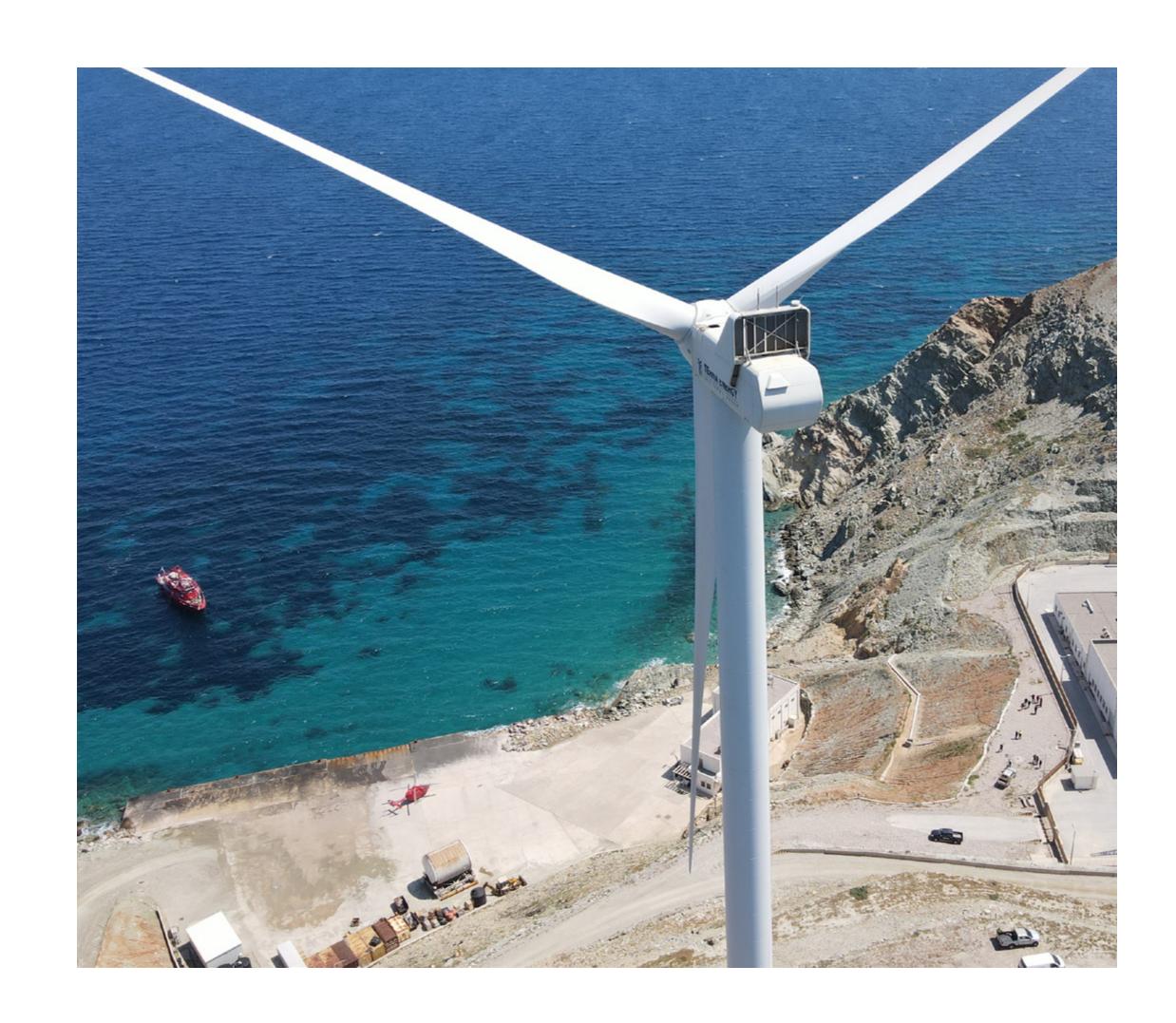
The operation of the Group creates or may create the following positive and negative impacts:

Health, Safety and Well-being

Positive Protection and promotion of physical, mental health and well**being**, through the implementation of a certified occupational health and safety management system and informing and training employees and associates on health and safety

Negative

Reduced contribution to the protection of physical, mental health and well-being, from possible non-compliance or improper implementation of health and safety procedures and instructions by employees, associates or suppliers.



TERNA ENERGY | People

Ensuring health and safety at work is one of the most important priorities of Group and concerns its employees, partners and those who visit its facilities or construction sites.

In order to enhance Health and Safety at work, the Group for the first time sets targets, the progress of which will be evaluated on an annual basis. Particularly the targets for 2022:

2022 Targets Zero accidents. Zero cases of occupational diseases. Zero incidents of violation of Health and Safety legislation. At least one audit for Health & Safety compliance per year, per installation. 100% disclosure of all incidents of non-compliance resulting from health and safety inspections. Continuous staff awareness through regular trainings, newsletters, campaigns, staff certifications in special subjects (e.g., work at height, First Aid, etc.). Implementation of 7 evacuation drills from wind turbine in an operational wind farm in Greece. Protecting the health of partners and employees (e.g., from the COVID-19 pandemic). Ensuring adequate allocation of resources - financial and human resources - to maintain a high level of Health & Safety. Continuous engagement between management and employees on Health & Safety issues.



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Health and Safety System

TERNA ENERGY Group implements an Occupational Health and Safety Management System, which is in accordance with the legal and other national, community and international requirements, directives and regulations in the field of Health and Safety. TERNA ENERGY Group's Health and Safety Management System at work is valid for all employees (including subcontractors) and across all projects and activities. Indicatively, with regards to issues of Health and Safety at work, the TERNA ENERGY Group applies the obligations set out in the Code of Laws for Health & Safety of employees (Law 3850/2010) for the provision of safety technician and occupational physician, where required.

In the context of the implementation of the certified Occupational Health and Safety Management System, TERNA ENERGY Group implements a Unified Management Systems Policy in which the Health and Safety Policy is integrated. The Policy applies to all the Group's activities and all those who, directly or indirectly, are related to its business activity.

The strengthening of the Health and Safety Policy and ensuring zero accidents and occupational diseases is a function of actions related to:

- The implementation of a certified Health and Safety Management System based on the requirements of the ISO 45001:2018 standard.
- Full compliance with legal and other national, community and international requirements, directives and regulations in the field of Health and Safety.
- The implementation, monitoring, evaluation and improvement of Health and Safety actions.
- The identification of occupational risks and the development of a comprehensive prevention methodology.
- The prevention of injuries, diseases and adverse health and safety incidents.
- The provision of appropriate, adequate training and information on Health and Safety to all employees, suppliers, partners and visitors.
- Compliance and strict adherence to Health and Safety procedures by all stakeholders.
- Immediate investigation of any accident / incident to assess the factors that led to it and take precautionary measures.
- The integration of technologies, good practices and operating procedures that guarantee conditions of safety to employees, subcontractors and third parties.

Terna Energy Group's Occupational Health and Safety Management System is certified according to ISO 45001:2018 and allows the organization to provide safe workplaces through the prevention of occupational accidents and occupational diseases, as well as through the preventive improvement of its performance in OSH issues.

Effective implementation and effort for continuous improvement leads, among others, to:

- Improvement of organizational internal management in matters of Occupational Health & Safety.
- Greater focus on achieving health and safety goals.
- Improvement of infrastructure and conditions of health and safety at work.
- Improving health and safety performance and productivity.
- Upgrading the image and name of the Group.
- Identification of important needs for staff training / improvement of staff skills.
- Satisfaction of the organization's human resources/ formation of better working conditions.
- Facilitating a cultural shift within the organization.
- Reduction of accidents and the frequency of illnesses of employees and consequently of the operating costs of the company.
- Increase in employee productivity due to the improvement of working conditions.

TERNA ENERGY Group's Top Management actively participates, supports, and gives priority to the implementation of the health and safety system at work, across every project in Greece and abroad. It is also committed to cooperating and consulting with employees to implement the goals it sets out to achieve, providing all the necessary resources for continuous improvement.



Risk minimization and incident investigation

Ensuring health, safety and well-being at work is everyone's responsibility and for this reason the Group is committed to taking the necessary measures to facilitate all stakeholder's compliance with health and safety measures. In an effort to cultivate a Health and Safety culture for all employees, the Group constantly invests in the protection of internal (employees) and external (suppliers and partners and other) stakeholders, in order to ensure business continuity, as well as the safe development of its activities.

More specifically, in order to eliminate and minimize the risks, the Group prepares Occupational Risk Assessment Studies for all its facilities (in operation and under construction), which identify all possible risks as well as the measures taken to minimize them.

In order to identify work-related risks and evaluate them, on a regular and irregular basis, the Group:

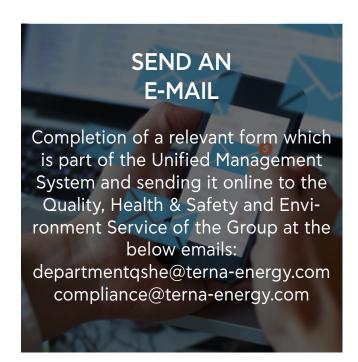
- Recognizes the legal and other requirements that apply and are related to Health and Safety risks at work.
- Collaborates with Safety Technicians, who act within an advisory role and propose measures to prevent and address risks and potentially dangerous situations.
- Employs **occupational physicians**, who are responsible for the systematic monitoring of the health and well-being of employees.
- Ensures the proper monitoring of the Health and Safety management system, by conducting regular **inter- nal** inspections on an annual basis.
- Prepares **Emergency Response Plans**.
- Plans and implements emergency preparedness exercises.
- Performs assessment measures of working environment factors (e.g., temperature, humidity, lighting, dust, noise).
- Collects and monitors the security issues sent by the manufacturers of the wind turbines (safety alerts) in order to better organize and take preventative measures if necessary.
- Checks the status of Personal Protective Equipment.

To ensure the effectiveness of the above procedures, the Group is in direct, continuous, and systematic cooperation with the Coordinators / Security Technicians and the executives of each project. In addition, the Management plans and implements measures to address any identified risks in order to minimize their negative impacts.

Aiming to continuously improve the Health and Safety Management System, internal inspections are carried out in order to assess the degree of implementation of the established procedures and measures for the protection of the health and safety of employees. After the completion of the internal audits, repeat inspections and / or follow-up meetings are held within a reasonable timeframe, through which the degree of implementation of the corrective actions, as discussed during the inspections, is assessed. In addition, the Group conducts inspections to assess the degree of compliance in accordance with Health & Safety legislation.



For the reporting of issues related to occupational risks and dangerous situations, the Employees of the Group or any other stakeholder may contact the Quality, Health- Safety and Environment Service of the Group and / or the Compliance Unit, either anonymously or by name, through the following communication channels:







In accordance with the provisions of the TERNA ENERGY Group Code of Conduct, top management takes all necessary measures to ensure the anonymity and confidentiality of each employee who registers such reports, as well as to protect them from any retaliation.

To investigate Health and Safety incidents, the relevant form of the Unified Management System is completed, in which information providing a description of the incident is filled in, such as the project, the location, the type of incident, its possible cause, as well as the corrective measures to be taken.



In 2021, one (1) recorded injury (minor injury) related to the use of lifting equipment in the workplace occurred. It is important to mention that there was a decrease of 77.8% in the rate of recordable work-related injuries, which in 2021 decreased to 0.28 from 1.26 in 2020.





☐ Further information can be found in the Chapter "Appendices"



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Health and safety services

Contributing to the identification and reduction as well as the elimination of risks, the TERNA ENERGY Group cooperates with occupational physicians, who are responsible for the systematic monitoring of the health and well-being of employees.

TERNA ENERGY Group, in collaboration with the occupational physicians and external certified trainers in First Aid, provides training to its employees in basic theoretical and practical modules where the participants are trained in a practical / experiential way, in order to be able to recognize, to assess and deal with life-threatening (or not) situations in adults, until EKAB is called for further action. In addition, Certificates of Medical Fitness for the work they perform are issued to all employees. Finally, the Group has appointed Safety Technicians, who are the main advisory body on issues related to the health and safety of employees and the prevention of occupational accidents.

The main duties of the Safety Technician as specified in Law 3850/2010 are the following:

- Regular inspection of jobs in terms of health and safety of employees and reporting of any non-compliance of health and safety measures.
- Supervision of the proper use of personal protective equipment.
- Investigation of the causes of occupational accidents, analysis and evaluation of the results and proposal of measures to prevent similar accidents which is recorded in the special book of the safety technician's recommendations kept by the facility.
- Exercise of a supervisory role in the execution of fire safety and alarm drills carried out in the company to determine preparedness for accidents.
- Informing and guiding employees to prevent occupational risks involved in their work.
- Training and implementation of training programs for employees on health and safety issues.



Employee participation and engagement

Although the Group does not have a Health and Safety Committee in which its employees participate, it supports the participation and engagement of employees in the development, implementation and evaluation of the Occupational Health and Safety Management System, through appropriate procedures.

The Group encourages all its employees to report:

- Dangerous situations so that preventive measures can be taken and corrective actions can be carried out.
- Suggestions/recommendations for improvement on health and safety at work.

The engagement and participation mechanisms implemented by the Group are the following:

- Regular Meetings between the Management and the Facility Managers. During these meetings, issues related to the identification and implementation of engagement and participation mechanisms, the identification of risks and the assessment of threats and opportunities, resource needs, the investigation of incidents, etc. are discussed.
- Regular Meetings between the Facility Manager and the employees. During these meetings, issues are
 discussed related to the understanding of the needs and expectations of stakeholders, the assignment of
 roles, requirements and responsibilities, the determination of how to meet legal and other requirements,
 the establishment of goals and continuous improvement.
- Use of a Single Management System form, which is used to record a description of the event, such as the project, the location, the type of event, its possible causes, as well as the corrective actions to be taken.
- Meetings and discussions of the Safety Technician with the employees of each facility / project during the preparation / update of the Occupational Risk Assessment Study.
- Conducting trainings /updates.
- Discussions with the Group's staff during visits/inspections to the premises.
- Internal communication (correspondence, e-mail, internal notes).



Health and Safety Training

Employees and subcontractors receive trainings on issues related to occupational risks and prevention. Trainings are carried out prior to the commencement of work (induction trainings) and during the construction or operation of the facilities, providing them free of charge and during the paid working hours to all employees.

All employees (including subcontractors) are trained by the Safety Technician, or by other approved instructors on the following key issues:



Occupational Health and Safety System



Use of Personal **Protective Equipment** (PPE)



Requirements for the Occupational Risk **Assessment Study**



Fire protection



Workplace behavior



Use of tools and equipment



Orderliness of premises / Cleanliness / Waste management



First Aid (Basic Principles of First Aid)



Emergency drills



Work at height



Evacuation exercises



Prevention of heat stress



Rescue exercises from wind turbines



Measures to deal with the pandemic



2020 hours of training on Health and Safety issues

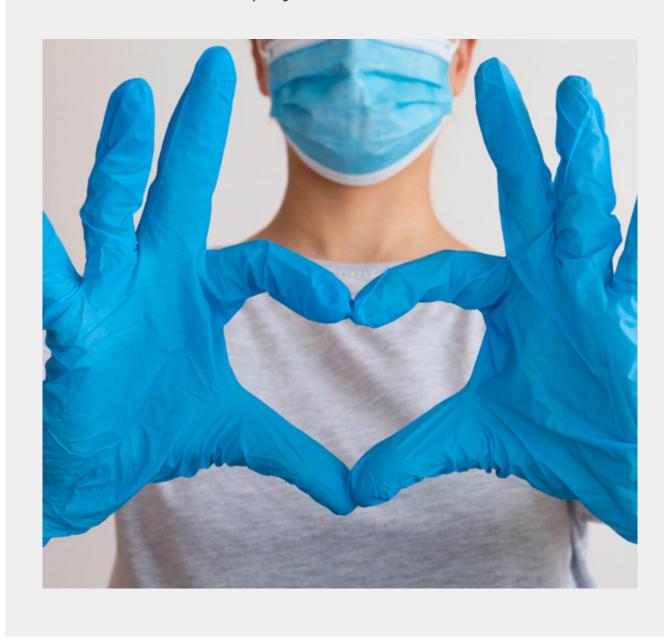


*The Safety Technician is responsible for the enrichment of the above educational issues, depending on the specificity of the project and the facilities. Under the responsibility of each project, a sufficient number of employees are trained in First Aid. The relevant training requirements are defined in the Health & Safety Plans / Occupational Risk Assessment Studies of the projects / facilities.



Health and Safety Benefits

The Group provides access to other medical and health services (e.g., health insurance, including family coverage of employees). Moreover, during the COVID-19 pandemic, it provided free diagnostic molecular detection tests to its people, through an agreement with a special diagnostic center for the examination of all employees.





Business relationships, health and safety

The protection of health and safety is not only related to the Group's employees, but also to all employees in the supply chain, such as suppliers and subcontractors. For this purpose, the Group ensures that the contracts include conditions for mandatory compliance with applicable National legislation on health and safety at work and the legal and other requirements of the client. In addition, the Group's associates are required to comply with its policies, procedures, standards and Management Systems, while subcontractors' employees must participate in the health and safety training organized by the Group.

In this context, the TERNA ENERGY Group frequently reviews the contracts it has concluded with its partners taking into account Health and Safety criteria (e.g., number of trained - qualified staff, risks arising from work-related activities, non-compliance with legal obligations) and does not hesitate to terminate cooperation if these criteria are not met.

Actions during the public health crisis

The effective organization of the TERNA ENERGY Group and the continuous care of management to utilize the executives according to the required ability and experience, has created a proven, capable, flexible and effective mechanism to deal with any potential crisis in the Group. This fact guided the actions of the Administration during the spread of the COVID-19 pandemic crisis and enabled its effective response, constantly following the health protocols of the National Public Health Organization, and the recommendations of the Occupational Physicians.

Throughout the year, a series of actions were carried out such as disinfection of workplaces and mechanical equipment, purchase of thermometers for the gates of the facilities, strengthening of cleaning by external crew, purchase of masks and disinfectant liquids, creation of posters and special information signs for COVID-19, purchase of electronic equipment to enhance teleworking, addition of infrastructure facilities such as changing rooms - showers in production units and installation of special plexiglass guards/dividers in shared offices.

With the beginning of the pandemic, the Incident Response Team was established exclusively for the management of COVID-19-related incidents and the monitoring of the proper implementation of hygiene measures. The team appointed a person responsible for receiving reports on incidents of employees or third parties who oversee the continuous updating of the rest of the Team, the Department of Health and Safety, the Occupational Physician, the Board of Directors and the authorities about any incident.

7.7 Protection and promotion of human rights



OUR APPROACH

Impacts

Providing equal opportunities and ensuring human rights promotes a fair working environment, a healthy corporate culture, the development of beneficial working relationships and responsible social operation. Therefore, the protection of human rights is important for the Group but also for the communities in which it operates.

For the evaluation of the actions taken for the protection and promotion of human rights, the Group sets objectives, the progress of which is evaluated on an annual basis.



The Group, respecting all its employees and partners, seeks to prevent the occurrence of cases of violation of their rights, through the adoption of policies, actions and control mechanisms, which are applied across all its activities.

Respect for international standards and principles

The Group in 2021, the Group adopted a Human Rights Policy. The Universal Declaration of Human Rights, the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the UN Global Compact, the United Nations Guiding Principles on Labor and the high corporate values advocated for by the Group, form a strict operating framework with respect for human rights, throughout the range of its activities.

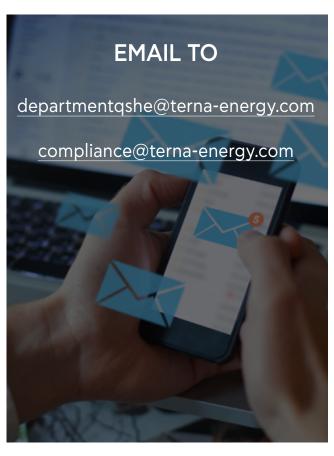
The Group is committed to the timely prevention and detection of any actions that are not in accordance with its operating framework for the protection of Human Rights. It defends the right of every human being to education and freedom of speech, to freedom of association and to any other human rights that may be violated because of, or in the course of its business activities and therefore applies control procedures which ensure that there is no violation of fundamental human rights.



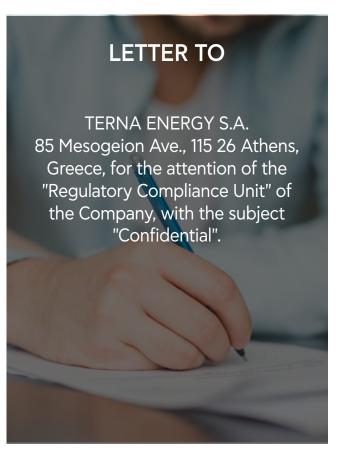
Characteristic of our efforts is that for another year, during 2021, no incidents of human rights violations and / or discrimination due to race, religion, gender, age, disability, nationality, political beliefs, etc. were reported in all the activities of the Group.

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Based on the Code of Conduct, all employees can report either anonymously or by name, any incident of discrimination, through the following communication channels:





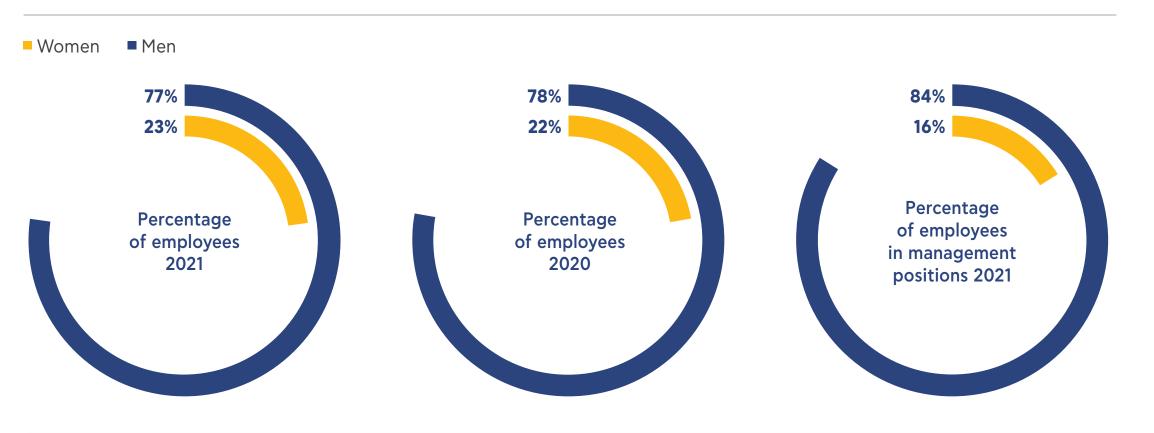






Enhancing diversity

Due to the nature of the Group's activity, its workforce is composed mainly of men. However, the Group's goal remains to represent all genders at all levels of employment. One step in this direction is to record and monitor the distribution of gender by geographical area of activity, by age and by function. In this way, the aim is to increase the percentage of diversity in the total number of employees.



^{*}The corresponding figures for 2020 referring to percentage of employees in management positions are under review and will be presented in the next Sustainable Development Report.

☑ More information can be found in the Chapter "Appendices/ ESG Key Performance Indicators (KPIs)".

Enhancing accessibility

The issue of equal access use and exploitation, by all-inclusive citizens, of our workplaces are becoming increasingly important and critical for us. To this end, we have been tested and comply with the requirements-recommendations of the ELOT 1439:2013 standard "Organization friendly to citizens with disabilities -Requirements and recommendations". The Group aims to ensure equal opportunities for all citizens without exception, which is inextricably linked to the core of the protection of human value and dignity, the principles of democracy and the rule of law.



08 Appendices



8.1 ESG Key Performance Indicators (KPIs)

Material topic: Ensuring regulatory compliance and business ethics

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
GRI 205-3	Confirmed incidents of corruption	#	0	0
GRI 418-1 ATHEX ESG SS-S2	Substantiated complaints concerning breaches of customer privacy and losses of customer data	#	0	0
GRI 307-1, GRI 2-27	Non-compliance with environmental laws and regulations	#	0	0
GRI 406-1	Total number of incidents of discrimination	#	0	0
ATHEX A-G2	Total amount of monetary losses caused as a result of breaches of business ethics	€	0	0

Material topic: Our contribution to tackling climate change

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
	Direct (Scope 1) GHG emissions			
ATHEX ESG C-E1, GRI 305-1, SASB IF-EU-110a.1	Total direct GHG emissions	tn CO₂e	333	292
ATHEX ESG C-E1, GRI 305-1, SASB IF-EU-110a.1	Biogenic CO2 emissions	tn CO₂e	4,318	3,747
	Energy indirect (Scope 2) GHG emissions			
ATHEX ESG C-E2, GRI 305-2, SASB IF-EU-110a.1	Location-based emissions	tn CO₂e	3,923	3,180
ATHEX ESG C-E2, GRI 305-2, SASB IF-EU-110a.1	Market-based emissions	tn CO₂e	195	3,180
ATHEX ESG C-E2, GRI 305-2, SASB IF-EU-110a.1	Which gases were included in the calculation of the indirect emissions (e.g., CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all)?		ALL	ALL
	Air emissions of pollutants			
GRI 305-7	NOx emissions (including NO and NO ₂ and exclude N ₂ O)	tn	3.45	N/A
GRI 305-3, ATHEX ESG A-E1	Other energy indirect (Scope 3) GHG emissions		93,853	N/A
GRI 305-3, ATHEX ESG A- E1	Indirect emissions from supplies of purchased goods and services (Category 1)	tn CO₂e	160.58	N/A
ATHEX ESG A- E1	Indirect emissions from capital goods (Category 2)	tn CO₂e	93,396.27	N/A
ATHEX ESG A- E1	Indirect emissions from fuels and energy-related activities not included in Scope 1 or Scope 2 (Category 3)	tn CO₂e	130	N/A
ATHEX ESG A- E1	Indirect emissions from upstream transportation and distribution (Category 4)	tn CO₂e	1.4	N/A
ATHEX ESG A- E1	Indirect emissions from waste generated in operations (Category 5)	tn CO₂e	20.7	N/A
ATHEX ESG A- E1	Indirect emissions from business travel (Category 6)	tn CO₂e	Calculated at GEK TERNA Group level	N/A
ATHEX ESG A- E1	Indirect emissions from the movement of employee commuting (Category 7)	tn CO₂e	143.9	N/A
ATHEX ESG A- E1	Emissions from Investments (Category 15)	tn CO₂e	Calculated at GEK TERNA Group level	N/A

Material topic: Our contribution to tackling climate change

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
	Energy consumption within the organization			
GRI 302-1	Fuel consumption within the organization from renewable sources	MJ	69,184,419	62,631,043
GRI 302-1	Fuel consumption within the organization from non-renewable sources	MJ	5,001,034	4,328,280
GRI 302-1	Electricity consumption within the organization	MJ	23,881,968	19,355,184
GRI 302-1	Electricity consumption within the organization from renewable energy sources- from the grid, with guarantees of origin	MJ	22,271,544	0
GRI 302-1	Electricity consumption within the organization – from the grid, without guarantees of origin	MJ	1,610,424	19,355,184
GRI 302-1	Total electricity consumption within the organization	MJ	98,067,421	86,314,507
GRI 302-1	Percentage of energy consumed within the organization from renewable sources	%	93	73
ATHEX ESG C-E3	Total energy consumption within the organization	MWh	27,241	23,976
ATHEX ESG C-E3	Total amount of electricity consumed within the organization	MWh	6,634	5,376
ATHEX ESG C-E3	Percentage of electricity consumed on the Group's total energy consumption	%	24	22
ATHEX ESG C-E3	Percentage of electricity consumed from renewable sources on the Group's total electricity consumption	%	93	0
ATHEX ESG C-E3	Total amount of energy produced*	MWh	2,284,254	4,143,144
ATHEX ESG C-E3	Percentage of energy produced from renewable sources	%	100	100
	Total energy consumption within the Group from non-renewable sources	MWh	1,837	6,579
	Total energy consumption within the Group from renewable sources	MWh	25,404	17,398
	Energy consumption from non-renewable sources for the Group's facilities excluding offices	MWh	1,835.89	4,222.4
	Energy consumption from renewable sources for the Group's facilities excluding offices	MWh	25,156.14	18,872.60
	Electricity consumption for the Group's facilities excluding offices	MWh	6,384.56	4,804.10
	Electricity consumption from renewable sources for the Group's facilities excluding offices	MWh	5,938.24	1,475.10
	Sources from which the electricity consumed from non-renewable sources comes from			
	Lignite	%	30.77	11.4**
	Diesel	%	0.83	7.6**
	Natural gas	%	20.61	43**
	Fossil coal	%	-	6.7**
	Fossil Fuels	%	0.1	0.8**
	Nuclear energy	%	28.02	4.6**
	Sources from which electricity consumed from renewable energy sources comes from****			
	Wind power	%	16	12. 5
	Photovoltaic		84	9
	Hydropower		-	3.3
	Biomass		-	1.1
	Geothermal energy	0/		0.1

^{*} The energy produced in 2020 included the units in the USA from which the Group disinvested in 2021 and their production has not been included in the 2021 data.

^{**} Data from the latest published energy mix bulletin (year 2020/ DAPEEP).

^{***}The data of the year 2021 have been derived from the certificates of guarantees of origin while of the year 2020 from a published energy mix bulletin (DAPEEP)

■ Material topic: The protection of biodiversity and the preservation of local ecosystems

I, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021			2020
	Water withdrawal					
	Water source		All areas	Water-Stress Areas	All areas	Water-Stress Areas
	Surface water		0	0	0	0
303-3, SASB F-EU-140a.1	Fresh water	ML	4,700,300	4,700,300	2,844,000	2,844,000
303-3, SASB IF-EU-140a.1	Other water (>1,000 mg/lt total of dissolved solids)	ML	0	0	0	0
HEX ESG SS-E3	The total volume of water withdrawn for consumption purposes within the organization by source	m ³	4,700,300,000	4,700,300,000	2,844,000,000	2,844,000,000
	Groundwater					
303-3, SASB F-EU-140a.1	Freshwater	ML	0	0	0	0
303-3, SASB F-EU-140a.1	Other water (>1,000 mg/lt total of dissolved solids)	ML	0	0	0	0
HEX ESG SS-E3	The total volume of water withdrawn for consumption purposes within the organization by source	m ³	0	0	0	0
	Seawater					
303-3, SASB F-EU-140a.1	Freshwater	ML	0	0	0	0
303-3, SASB F-EU-140a.1	Other water (>1,000 mg/lt total of dissolved solids)	ML	1.24	1.24	0	0
HEX ESG SS-E3	The total volume of water withdrawn for consumption purposes within the organization by source	m ³	1240	1240	0	0
	Produced water					
303-3	Freshwater	ML	0	0	0	0
303-3	Other water (>1,000 mg/lt total of dissolved solids)	ML	0	0	0	0
HEX ESG SS-E3	The total volume of water withdrawn for consumption purposes within the organization by source	m ³	0	0	0	0
	Third-party water ¹			_	-	_
303-3, SASB F-EU-140a.1	Freshwater	ML	1.33	1.04	0.20	0.20
303-3, SASB F-EU-140a.1	Other water (>1,000 mg/lt total of dissolved solids)	ML	0	0	0	0
303-3	Surface water	ML	0	0	0	0
303-3	Groundwater	ML	0	0	0	0
303-3	Seawater	ML	0	0	0	0
303-3	Produced water	ML	0	0	0	0
HEX ESG SS-E3	Total volume of wate withdrawal for consumption by source		1,330	1,040	200	200
	Total				-	_
303-3, SASB F-EU-140a.1	Freshwater	ML	4,700,301.33	4,700,301.04	2,844,000.20	2,844,000.20
303-3, SASB F-EU-140a.1	Other water (>1,000 mg/lt total of dissolved solids)	ML	1.24	1.24	0	0
l 303-3, SASB IF-EU-140a.1	Total Freshwater	ML	4,700,301.33	4,700,301.04	2	2,844,000.20

¹Data refer to human consumption only.

■ Material topic: The protection of biodiversity and the preservation of local ecosystems

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit		2021		2020
	Water discharge					
	Water source		All areas	Water-Stress Areas	All areas	Water-Stress Areas
	Surface water					
GRI 303-4	Freshwater	ML	4,700,300	4,700,300	2,844,000	2,844,000
GRI 303-4	Other water (>1,000 mg/lt total of dissolved solids)	ML	0	0	0	0
	Groundwater					
GRI 303-4	Freshwater	ML	0	0	0	0
GRI 303-4	Other water (>1,000 mg/lt total of dissolved solids)	ML	0	0	0	0
	Seawater					
GRI 303-4	Freshwater	ML	0	0	0	0
GRI 303-4	Other water (>1,000 mg/lt total of dissolved solids)	ML	0.87	0.87	0	0
	Third-party water					
GRI 303-4	Freshwater	ML	0	0	0	0
GRI 303-4	Other water (>1,000 mg/lt total of dissolved solids) Total third-party water sent for use to other organizations	ML	0	0	0	0
	Total					
GRI 303-4	Freshwater	ML	4,700,300	4,700,300	2,844,000	2,844,000
GRI 303-4	Other water (>1,000 mg/lt total of dissolved solids)	ML	0.87	0.87	0	0

■ Material topic: The protection of biodiversity and the preservation of local ecosystems

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021		2021			2020
	Total water withdrawal ¹		All areas	Water-Stress Areas	All areas	Water-Stress Areas		
GRI 303-3, SASB IF-EU-140a.1	a) Total water withdrawal	ML	4,700,302.57	4,700,302.28	2,844,000.20	2,844,000.20		
GRI 303-3	b) Total freshwater withdrawal	ML	4,700,301.33	4,700,301.04	2,844,000.20	2,844,000.20		
SASB IF-EU-140a.1	Percentage of withdrawal		-	99,99%	-	100%		
GRI 303-3	c) Total other water withdrawal (>1,000 mg/lt total dissolved solids)	ML	1.24	1.24	0	0		
	Total water discharge							
GRI 303-4	a) Total water discharge	ML	4,700,300.87	4,700,300.87	2,844,000	2,844,000		
GRI 303-4	b) Total freshwater discharge	ML	4,700,300	4,700,300	2,844,000	2,844,000		
GRI 303-4	c) Other water (>1,000 mg/lt total of dissolved solids)	ML	0.87	0.87	0	0		
	Total water consumption							
GRI 303-5	a) Total water consumption	ML	1.70	1.42	0.20	0.20		
GRI 303-5, ATHEX ESG SS-E3	Total water consumption	m ³	1,700	1,420	200	200		
SASB IF-EU-140a.1	Percentage of water consumption from water-stress areas	%	-	83,52%	-	100%		
GRI 303-5	b) Change in water storage	ML	0	0	0	0		
GRI 303-5, ATHEX ESG SS-E3	Total volume of water recycled and reused		0	0	N/A	N/A		
GRI 303-5, ATHEX ESG SS-E3	Recycled water	%	0	0	N/A	N/A		
GRI 307-1, SASB IF-EU-140a.2	Monetary fines or other sanctions or incidents regarding the violation of environ- mental legislation and the relevant regulations, permits and standards for water (e.g., quantity and / or water quality).	#	0	0	0	N/A		

¹Includes data from all operating facilities controlled by the Group in Greece, Bulgaria, Poland, USA, as well as from the offices in Serbia, North Macedonia and Albania. The following data have been calculated:

⁻ River water for the operation of hydroelectric power stations (the water entering the station in this case is equal to the water leaving).

⁻ Seawater used for desalination on the island of Agios Georgios.

⁻ Water from local networks, water transported to the premises by vehicle and bottled water.

⁻ Areas of significant impact on water reserves have been identified through the WWF Water Risk Filter (Low risk are considered only facilities in Bulgaria, half of the facilities in Poland and 2/3 of the facilities in the USA).

² Data refer to human consumption only.

■ Material topic: The protection of biodiversity and the preservation of local ecosystems

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021			
	Withdrawal quantities and use of water abroad		POLAND	BULGARIA	USA	SERBIA
	Water withdrawal per source:		0	0	0	0
	Surface water	m^3	0	0	0	0
	Groundwater	m^3	0	0	0	0
	Sea water	m ³	0	0	0	0
	Water produced	m ³	0	0	0	0
	Third parties	m ³	157	16	108,49	12

Material topic: Soil

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
	Hazardous Waste			
GRI 306-3	Waste generated	tn	127.84	55.04
GRI 306-3	Waste diverted from disposal	tn	127.84	55.04
GRI 306-3	Waste directed to disposal	tn	0	0
	Non-Hazardous Waste			
GRI 306-3	Waste generated	tn	40.38	31.04
GRI 306-3	Waste diverted from disposal	tn	26.87	19.03
GRI 306-3	Waste directed to disposal	tn	13.51	12.01

Material topic: Soil

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	Unit 2021 ¹			2020²		
	Waste diverted from disposal							
	Hazardous Waste		Onsite	Offsite	Total	Onsite	Offsite	Total
GRI 306-4	Preparation for reuse	tn	0	0	0	0	0	0
GRI 306-4	Recycling	tn	0	127.84	127.84	0	55.04	55.04
GRI 306-4	Total	tn	0	127.84	127.84	0	55.04	55.04
	Non-hazardous waste		Onsite	Offsite	Total	Onsite	Offsite	Total
GRI 306-4	Preparation for reuse	tn	0	0	0.00	0	0	0
GRI 306-4	Recycling	tn	0	26.87	26.87	0	19.03	19.03
GRI 306-4	Total	tn	0	26.87	26.87	0	19.03	19.03
	Waste directed to disposal							
	Hazardous Waste		Onsite	Offsite	Total	Onsite	Offsite	Total
GRI 306-5	Incineration (with energy recovery)	tn	0	0	0	0	0	0
GRI 306-5	Incineration (without energy recovery)	tn	0	0	0	0	0	0
GRI 306-5	Landfilling	tn	0	0	0	0	0	0
GRI 306-5	Total	tn	0.00	0.00	0.00	0.00	0.00	0.00
	Non-hazardous waste		Onsite	Offsite	Total	Onsite	Offsite	Total
GRI 306-5	Incineration (with energy recovery)	tn	0	0	0	0	0	0
GRI 306-5	Incineration (without energy recovery)	tn	0	0	0	0	0	0
GRI 306-5	Landfilling	tn	0	13.51	13.51	0	12.01	12.01
GRI 306-5	Total	tn	0	13.51	13.51	0	12.01	12.01

The above data for the year 2021 includes: Facilities in operation in countries: Greece, USA, Bulgaria and Poland (Waste management Facility in Ioannina, Greece is not included, as the relevant waste data is provided by the Region of Epirus).

Material topic: Soil

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
	Percentage of waste by type of treatment			
ATHEX ESG A-E3	Hazardous Waste	tn	127.84	55.04
ATHEX ESG A-E3	Landfilling	%	0	0
ATHEX ESG A-E3	Incineration (with energy recovery)	%	0	0
ATHEX ESG A-E3	Incineration (without energy recovery)	%	0	0
ATHEX ESG A-E3	Recycling	%	100	100
ATHEX ESG A-E3	Preparation for reuse	%	0	0
ATHEX ESG A-E3	Non-hazardous waste	tn	40.38	31.04
ATHEX ESG A-E3	Landfilling	%	33.46	61.31
ATHEX ESG A-E3	Incineration (with energy recovery)	%	0	0
ATHEX ESG A-E3	Incineration (without energy recovery)	%	0	0
ATHEX ESG A-E3	Recycling	%	66.54	38.69
ATHEX ESG A-E3	Preparation for reuse	%	0	0

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit		2021	
	Hazardous waste generated abroad				
	Country		POLAND	BULGARIA	U.S.A.
	Type of waste				
	Lubricants	kg	0	1,800	0
	Contaminated absorbent materials	kg	2,375	900	8,776.87
	Contaminated plastic packaging	kg	214.5	0	0
	Oil filters	kg	1,198	0	5,548.61
	Batteries	kg	29	0	0
	Electrical equipment waste	kg	0	0	160
	Total	kg	3,816.5	2,700	14,485.48
	Total	tn	3.817	2.7	14.485

■ Material topic: Creation and distribution of direct and indirect economic value

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
	Direct Economic Value Generated			
GRI 201-1	Revenues	thousand €	412,887	361,511
	Direct Economic Value Distributed			
GRI 201-1	Operating Costs	thousand €	267,285	236,561
GRI 201-1	Employee wages and benefits	thousand €	13,837	13,468
GRI 201-1	Payments to providers of capital	thousand €	72,934	81,401
GRI 201-1	Payments/Contributions to the State, by country			
GRI 201-1	Greece	thousand €	26,759	27,432
GRI 201-1	Cyprus	thousand €	529	-608
GRI 201-1	North Macedonia	thousand €	0	0
GRI 201-1	Albania	thousand €	2	2
GRI 201-1	Bulgaria	thousand €	104	63
GRI 201-1	Romania	thousand €	0	0
GRI 201-1	Serbia	thousand €	5	2
GRI 201-1	U.A.E.	thousand €	0	0
GRI 201-1	Qatar	thousand €	0	0
GRI 201-1	Iraq	thousand €	0	0
GRI 201-1	Saudi Arabia	thousand €	0	0
GRI 201-1	Bahrain	thousand €	0	0
GRI 201-1	Poland	thousand €	1,318	1,644
GRI 201-1	U.S.A.	thousand €	61	4,182
GRI 201-1	Libya	thousand €	0	0
GRI 201-1	Malta	thousand €	0	0
GRI 201-1	The Netherlands	thousand €	0	0
GRI 201-1	Community investments	thousand €	1,901	429
GRI 201-1	Total	thousand €	384,736	364,575
GRI 201-1	Economic value retained (Direct Economic Value Generated-Direct Economic Value Distributed)	thousand €	28,151	-3,064

^{*} Data for 2020 has not been restated so that to exclude discontinued operations in the US.

Material topic: Creation and distribution of direct and indirect economic value

GRI, ATHEX ESG, SASB	ESG Performance Indicators	2021	2021				2020				
		Value of period purchases in thousand €	Percentage of period purchases	Number of suppliers	Percentage number of suppliers	Value of period purchases in thousand €	Percentage of period purchases	Number of suppliers	Percentage number of suppliers		
	Categorization of suppliers by scope										
GRI 204-1	National suppliers ¹	284,396	72.4%	1,739	90%	167,202	83.1%	1,731	89.8%		
GRI 204-1	International suppliers ²	99,734	25.4%	177	9.2%	30,838	15.3%	184	9.5%		
GRI 204-1	Related Parties ³	8,441	2.2%	16	0.8%	3,243	1.6%	12	0.6%		
GRI 204-1	Total	392,571	100.0%	1,932	100.0%	201,283	100.0%	1,927	100.0%		

¹National suppliers are those who during the reference period 2021 supply the companies of the Group and are located in the same territory (country) as them.

² International suppliers are those who have supplied Group companies and are not located in the same territory (country) as them. Only suppliers with a consolidated amount of purchases in the period>€1,000 are counted. It is algorithmically calculated for the specific period.

³ Related parties: as defined in IAS 24 «Related parties» the IFRS joint ventures (Joint Ventures), relatives and the members of the Boards of the Group companies.

Material topic: Contribution to employment

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021		2020	
			Men	Women	Men	Women
GRI 2-7	Number of permanent employees	#	280	100	266	74
GRI 2-7	Number of temporary employees	#	8	0	7	1
GRI 2-7	Number of non-guaranteed working hours employees	#	0	0	0	0
GRI 2-7	Number of full-time employees	#	288	96	263	66
GRI 2-7	Number of part-time employees	#	0	4	10	7
GRI 2-7	Number of self-employed employees	#	109	21	91	20
GRI 2-7	Number of employees (including those self-employed) (Total)	#	397	121	364	93
GRI 2-7	Number of employees (excluding those self-employed) (Total)	#	288	100	273	75

ESG Performance Indicators	Unit	2021	2021					2020	2020				
		Total	Men	Women	<30 years old	30-50 years old	>50 years old	Total	Men	Women	<30 years old	30-50 years old	>50 years old
New employee hires and employee turnover ¹													
Number of new employee hires	#	108	80	28	27	68	13	10	8	2	1	7	2
Rate of new employee hires	%	21	15	5	5	13	3	22	18	4	2	16	4
Number of employee turnover	#	60	52	8	12	44	4	4	2	2	0	4	0
Rate of employee turnover	%	11	10	2	2	9	0,4	9	4	4	0	9	0
Voluntary turnover rate	%	7	7	1	1	6	0,4	7	2	4	0	7	0
Involuntary turnover rate	%	4	3	1	1	3	0	2	2	0	0	2	0
	New employee hires and employee turnover¹ Number of new employee hires Rate of new employee hires Number of employee turnover Rate of employee turnover Voluntary turnover rate	New employee hires and employee turnover¹ Number of new employee hires # Rate of new employee hires % Number of employee turnover # Rate of employee turnover % Voluntary turnover rate %	New employee hires and employee turnover¹ Number of new employee hires # 108 Rate of new employee hires % 21 Number of employee turnover # 60 Rate of employee turnover % 11 Voluntary turnover rate % 7	TotalMenNew employee hires and employee turnover¹Number of new employee hires#10880Rate of new employee hires%2115Number of employee turnover#6052Rate of employee turnover%1110Voluntary turnover rate%77	New employee hires and employee turnover¹ # 108 80 28 Rate of new employee hires # 108 80 28 Rate of new employee hires % 21 15 5 Number of employee turnover # 60 52 8 Rate of employee turnover % 11 10 2 Voluntary turnover rate % 7 7 1	New employee hires and employee turnover¹ # 108 80 28 27 Number of new employee hires # 108 80 28 27 Rate of new employee hires % 21 15 5 5 Number of employee turnover # 60 52 8 12 Rate of employee turnover % 11 10 2 2 Voluntary turnover rate % 7 7 1 1	New employee hires and employee turnover¹ # 108 80 28 27 68 Rate of new employee hires # 108 80 28 27 68 Rate of new employee hires % 21 15 5 5 13 Number of employee turnover # 60 52 8 12 44 Rate of employee turnover % 11 10 2 2 9 Voluntary turnover rate % 7 7 1 1 6	New employee hires and employee turnover¹ # 108 80 28 27 68 13 Rate of new employee hires # 108 80 28 27 68 13 Number of new employee hires % 21 15 5 5 13 3 Number of employee turnover # 60 52 8 12 44 4 Rate of employee turnover % 11 10 2 2 9 0,4 Voluntary turnover rate % 7 7 1 1 6 0,4	New employee hires and employee turnover¹ # 108 80 28 27 68 13 10 Rate of new employee hires # 108 80 28 27 68 13 10 Rate of new employee hires % 21 15 5 5 13 3 22 Number of employee turnover # 60 52 8 12 44 4 4 Rate of employee turnover % 11 10 2 2 9 0,4 9 Voluntary turnover rate % 7 7 1 1 6 0,4 7	New employee hires and employee turnover¹ # 108 80 28 27 68 13 10 8 Rate of new employee hires # 108 80 28 27 68 13 10 8 Number of new employee hires % 21 15 5 5 13 3 22 18 Number of employee turnover # 60 52 8 12 44 4 4 2 Rate of employee turnover % 11 10 2 2 9 0,4 9 4 Voluntary turnover rate % 7 7 1 1 6 0,4 7 2	New employee hires and employee turnover¹ # 108 80 28 27 68 13 10 8 2 Rate of new employee hires # 108 80 28 27 68 13 10 8 2 Rate of new employee hires # 60 52 8 12 44 4 4 2 2 Rate of employee turnover % 11 10 2 2 9 0,4 9 4 4 Voluntary turnover rate % 7 7 1 1 6 0,4 7 2 4	New employee hires and employee turnover¹ # 108 80 28 27 68 13 10 8 2 1 Rate of new employee hires # 108 80 28 27 68 13 10 8 2 1 Rate of new employee hires % 21 15 5 5 13 3 22 18 4 2 Number of employee turnover # 60 52 8 12 44 4 4 2 2 0 Rate of employee turnover % 11 10 2 2 9 0,4 9 4 4 0 Voluntary turnover rate % 7 7 1 1 6 0,4 7 2 4 0	New employee hires and employee turnover¹ # 108 80 28 27 68 13 10 8 2 1 7 Rate of new employee hires % 21 15 5 5 13 3 22 18 4 2 16 Number of employee turnover # 60 52 8 12 44 4 4 2 2 0 4 Rate of employee turnover % 11 10 2 2 9 0,4 9 4 4 0 9 Voluntary turnover rate % 7 7 1 1 6 0,4 7 2 4 0 7

¹In the Table: amounts are presented rounded.

Material topic: Promoting health, safety and well-being

GRI, ATHEX ESG, SASB	ESG Performance Indicators	2021	2021	2020
	Workers covered by an occupational health and safety management system			
GRI 403-8	Employees and workers who are not employees but whose work and / or workplace is controlled by the organization ¹	#	583	575
	Number and percentage of all employees and workers who are not employees but whose work and / or workplace is controlled by the organization, who are covered by a health and safety management system			
GRI 403-8	Number	#	583	575
GRI 403-8	Percentage	%	100	100
	Number and percentage of all employees and workers who are not employees but whose work and / or workplace are controlled by the organization, who are covered by a health and safety system that has been internally audited			
GRI 403-8	Number	#	583	575
GRI 403-8	Percentage	%	100	100
	Number and percentage of all employees and workers who are not employees but whose work and / or workplace is controlled by the organization, who are covered by a health and safety system that has been audited by an external body ²			
GRI 403-8	Number	#	485	521
GRI 403-8	Percentage	%	83.19	90.61

Material topic: Promoting health, safety and well-being

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
	Work-related injuries			
	Employees			
GRI 403-9	Number of hours worked	#	704,934	950,560
GRI 403-9	Number of fatalities as a result of work-related injury	#	0	0
GRI 403-9	Rate of fatalities as a result of work-related injury	#	0.00	0.00
GRI 403-9	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0
GRI 403-9	Rate of high-consequence work-related injuries (excluding fatalities)	#	0.00	0.00
GRI 403-9	Number of recordable work-related injuries (recordable) ²	#	1	6
GRI 403-9	Rate of recordable work-related injuries (recordable) ³	#	0.28	1.26
GRI 403-9	Rate of recordable work-related injuries	#	0.85	2.10
	Workers who are not employees but whose work and / or workplace is controlled by the organization			
GRI 403-9	Number of hours worked	#	110,216	47,392
GRI 403-9	Number of fatalities as a result of work-related injury	#	0	0
GRI 403-9	Rate of fatalities as a result of work-related injury	#	0.00	0.00
GRI 403-9	Number of high-consequence work-related injuries (excluding fatalities)	#	0	0
GRI 403-9	Rate of high-consequence work-related injuries (excluding fatalities)	#	0	0
GRI 403-9	Number of recordable work-related injuries ³	#	0	0
GRI 403-9	Rate of recordable work-related injuries ⁴	#	0.00	0.00
GRI 403-9	Accident severity rate	#	0.00	0.00
	Near-miss frequency rate			
SASB IF-EU-320a.1	Number of work-related near misses	#	2	0
SASB IF-EU-320a.1	Near-miss frequency rate	#	0.48	0.00

² They refer to minor injuries

On the table:

³ Accident frequency index based on the terminology of the ESG Information Disclosure Guide of the Athens Stock Exchange.

[•] There was no death, high-consequence injury, work related illness (GRI 403-10)

[•] Indicators have been calculated by a factor of 200,000 ([total number of working days lost due to occupational accidents/tot

[•] Work-related hazards that may cause injuries have been identified and recorded by the safety engineer in collaboration with the operations and project managers of each facility through the occupational risk assessment process. The Safety Technician in the event of any injury makes recommendations for compliance with safety rules and instructions in order to demonstrate due care.

[•]The category "Employees who are not employees but whose work and / or workplace is controlled by the organization" includes employees of subcontractors, interns and employees from third-party organizations.

■ Material topic: Contribution to employee training and development

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2021		
			Men	Women	Men	Women
GRI 404-1	Average training hours per year per employee ¹	h	3.8	3.0	9,0	10.6
GRI 404-1	Employees in the top 10% of employees by total compensation	h	7.6	7.0	2.1	0.4
GRI 404-1	Employees in the bottom 90% of employees by total compensation	h	19.1	6.7	2.3	1.7
GRI 404-1	Administrative staff	h	3.7	13.8	2.7	2.6
GRI 404-1	Technicians	h	6.7	1.1	3.5	0.0
GRI 404-1	Craftsmen - other	h	7.2	0.1	1.0	3.2

Material topic: Protection and promotion of human rights

GRI, ATHEX ESG, SASB	ESG Performance Indicators	Unit	2021	2020
ATHEX ESG C-S2	Percentage of female workers	%	23	22
ATHEX ESG C-S3	Percentage of female employees in top 10% of employees by total compensation	%	16	-

8.2 About the Sustainable Development Report



ATHEX ESG

This Report constitutes the 7th consecutive Sustainable Development Report and is available in electronic form on the TERNA ENERGY's website. The Report presents data for the period of January 1, 2021 to December 31, 2021. The financial statements of TERNA ENERGY cover the same period, but the Group additionally publishes interim financial statements.

The Report presents information regarding the management approach and the Group's performance on material sustainable development topics relevant to its business activities. The aim of the Report is to inform stakeholders of the impacts that the Group creates or may create on the environment, people, and the economy, as well as forming a basis for comparing TERNA ENERGY's performance in sustainability matters for the coming years.

The data of the GRI 2-7, GRI 201-1, GRI 302-1, GRI 305-1 and GRI 401-1 disclosures for 2020 vary as compared to the 2020 Report, due to a different approach in calculating the respective disclosures as well as because of the GRI Standards 2021 update and its requirements.

The report has been prepared in accordance with the new GRI Standards 2021 («In accordance with the GRI Standards»), the updated Athens Stock Exchange ESG Reporting Guide 2022 and the SASB Standard «Electric Utilities & Power Generators, 2018».

The preparation of this Report was drafted with the consulting support of the Climate Change and Sustainability Services department of EY Greece.*

For the 2021 Sustainable Development Report, the Group has not proceeded with external assurance.

TERNA ENERGY considers that the opinion of each reader on the content of the Report is particularly important for the development of dialogue as well as its improvement. For this purpose, you can send your comments and/or any queries to the following contact details:

CONTACT PERSON FOR THE SUSTAINABLE DEVELOPMENT REPORT DANAI KALANTIDI

85, MESOGEION STREET, ATHENS, 11526, GREECE, TEL: 210 69 68 000, FAX: 210 69 68 908 99, E-mail: dkalantidi@gekterna.com

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DEPARTMENTS/DIRECTORATES

- Quality, Health, Safety, Environment and Standards
- Human Resources
- Regulatory Compliance
- Finance

ART DIRECTOR

Giorgios Haritos

^{*} The responsibility for the calculation, collection and consolidation of quantitative data, as well as the responsibility for the accuracy and completeness of the quantitative and qualitative information included in the Report, belongs to TERNA ENERGY. Ernst & Young (HELLAS) Certified Public Accountants S.A. bears no liability towards any third party for the content of this Report

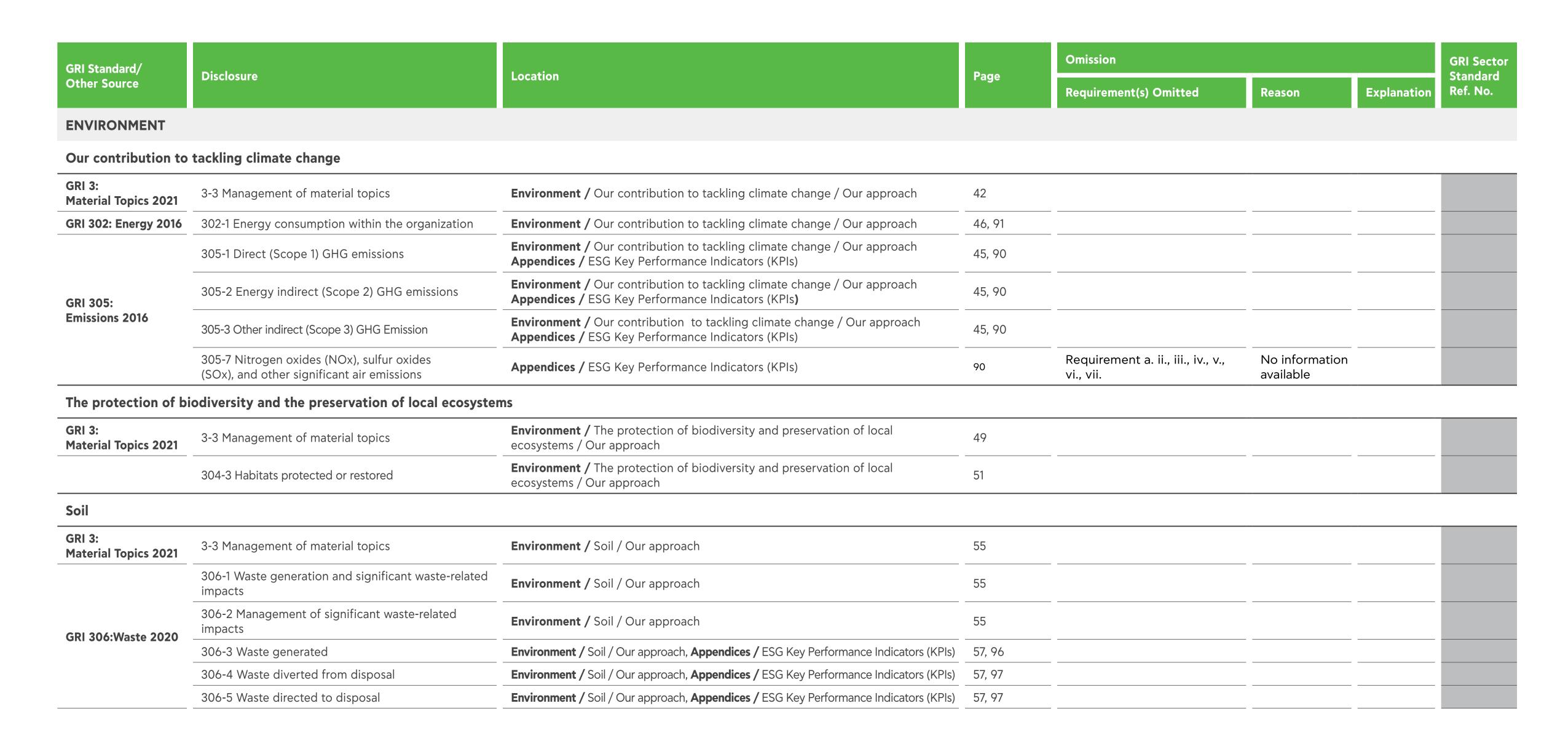
8.3 GRI Content Index

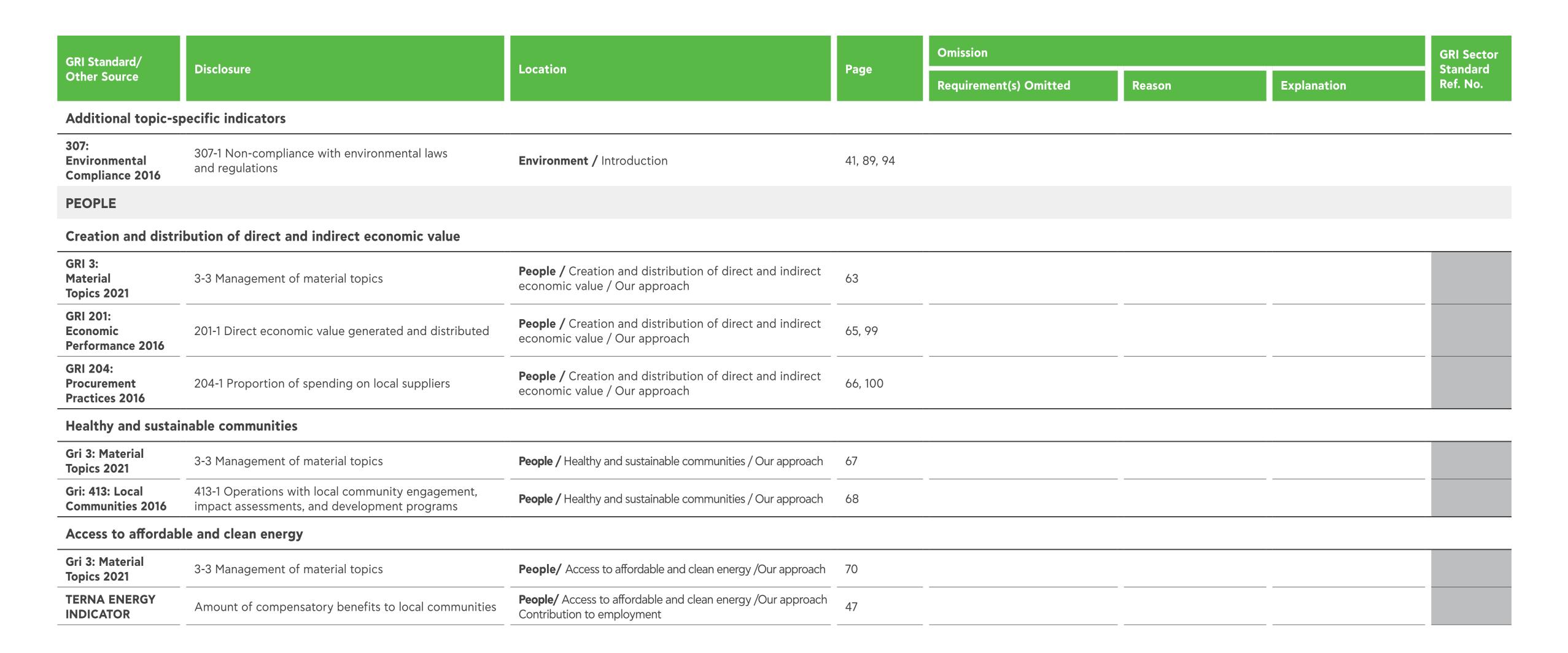
STATEMENT	OF USE		TERNA ENERGY has re	eported in accordance with the GRI St	andards for the period	01/01/2021 - 31/12/2021						
GRI 1 USED			GRI 1: FOUNDATION 2021									
APPLICABLE	APPLICABLE GRI SECTOR STANDARDS			N/A								
GRI Standard/			D	Omission	GRI Sector							
Other Source	Disclosure	Location	Page	Requirement(s) Omitted	Reason	Explanation	Standard Ref. No.					
ΓΕΝΙΚΕΣ ΔΗ	ΜΟΣΙΟΠΟΙΗΣΕΙΣ											
	2-1 Organizational details	Profile, Profile / Business model	5, 6, 10									
	2-2 Entities included in the organization's sustainability reporting	Appendices / About the Sustainable Development Report	t 105									
	2-3 Reporting period, frequency and contact point	Appendices / About the Sustainable Development Report	t 105	A gray cell indicates something that does not apply. This only relates to the 'Omission' and 'GRI Sector Standard ref. no.' columns.								
GRI 2: General	2-4 Restatements of information	Appendices / About the Sustainable Development Report	t 105									
Disclosures 2021	2-5 External assurance	Appendices / About the Sustainable Development Report	t 105									
	2-6 Activities, value chain and other business relationships	Profile,Profile / Activities, value chain and business relationshipsProfile / Value chain and business relationships	6, 7, 9	6, 7, 9								
	2-7 Employees	People / Contribution to employment / Our appro Appendices / ESG Key Performance Indicators (KF	/ 3 1 1									

GRI Standard/	D'autanus		Dame.	Omission			GRI Sector
Other Source	Disclosure	Location	Page	Requirement(s) Omitted	Reason	Explanation	Standard Ref. No.
	2-8 Workers who are not employees	People / Contribution to employment / Our approach	73				
	2-9 Governance structure and composition	Governance / Corporate Governance	23				
	2-10 Nomination and selection of the highest governance body	Governance / Corporate Governance	25				
	2-11 Chair of the highest governance body	Governance / Corporate Governance	23				
	2-12 Role of the highest governance body in overseeing the management of impacts	Governance / Corporate Governance, Sustainable Development Approach / Sustainable Development Policy, Management of sustainable development issues	12, 14, 23				
GRI 2: General	2-13 Delegation of responsibility for managing impacts	Governance / Corporate Governance, Sustainable Development Approach / Sustainable Development Policy, Management of sustainable development issues	12, 14, 23				
Disclosures 2021	2-14 Role of the highest governance body in sustainability reporting	Sustainable Development Approach / Materiality Analysis	17				
	2-15 Conflicts of interest	Governance/ Corporate Governance	25				
	2-16 Communication of critical concerns	Governance / Ensuring regulatory compliance and business ethics / Our approach	31				
	2-17 Collective knowledge of the highest governance body	Governance / Corporate Governance	26				
_	2-18 Evaluation of the performance of the highest governance body	Governance / Corporate Governance	26				
	2-19 Remuneration policies	Governance / Corporate Governance	27				
	2-20 Process to determine remuneration	Governance / Corporate Governance	27				
	2-21 Annual total compensation ratio	-	-	2-21a, 2-21.b, 2.21-c	Confidential information		

GRI Standard/	D'autaum.		Do	Omission			GRI Sector
Other Source	Disclosure	Location	Page	Requirement(s) Omitted	Reason	Explanation	Standard Ref. No.
	2-22 Statement on sustainable development strategy	Message from the CEO	3				
	2-23 Policy commitments	Governance / Ensuring regulatory compliance and business ethics / Our approach	30				
	2-24 Embedding policy commitments	Governance / Ensuring regulatory compliance and business ethics / Our approach	30				
GRI 2:	2-25 Processes to remediate negative impacts	Governance / Ensuring regulatory compliance and business ethics / Our approach	31				
General Disclosures 2021	2-26 Mechanisms for seeking advice and raising concerns	Governance / Ensuring regulatory compliance and business ethics / Our approach	31				
	2-27 Compliance with laws and regulations	Governance / Ensuring regulatory compliance and business ethics / Our approach	32, 41, 89				
	2-28 Membership associations	Sustainable Development Approach/ Participations	20				
	2-29 Approach to stakeholder engagement	Sustainable Development Approach/ Stakeholder Engagement	14				
	2-30 Collective bargaining agreements	People / Contribution to employment / Our approach	2-30: 73				







GRI Standard/ Other Source	D'autaum.		Page	Omission		GRI Sector				
	Disclosure	Location		Requirement(s) Omitted	Reason	Explanation	Standard Ref. No.			
Contribution to employment - Non-material topic										
Gri 401: Eµployment 2016	401-1 New employee hires and employee turnover	People / Contribution to employment / Our approach	75, 101							
Contribution to en	nployee training and development - Non-material top	oic								
404: Training And Education 2016	404-1 Average hours of training per year per employee	People / Contribution to employee training and development / Our approach	77, 104							

GRI Standard/				Omission			GRI Sector
Other Source	Disclosure	Location	Page	Requirement(s) Omitted	Reason	Explanation	Standard Ref. No.
Promoting he	ealth, safety and well-being						
Material	3-3 Management of material topics	People / Promoting health, safety and well-being / Our approach	78				
	403-1 Occupational health and safety management system	People / Promoting health, safety and well-being / Our approach	80				
	403-2 Hazard identification, risk assessment, and incident investigation	People / Promoting health, safety and well-being / Our approach	81				
	403-3 Occupational health services	People / Promoting health, safety and well-being / Our approach	83				
	403-4 Worker participation, consultation, and communication on occupational health and safety	People / Promoting health, safety and well-being / Our approach	83				
Occupational	403-5 Worker training on occupational health and safety	People / Promoting health, safety and well-being / Our approach	84				
	403-6 Promotion of worker health	People / Promoting health, safety and well-being / Our approach	85				
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	People / Promoting health, safety and well-being / Our approach	85				
	403-8 Workers covered by an occupational health and safety management system	People / Promoting health, safety and well-being / Our approach	102				
	403-9 Work-related injuries	People / Promoting health, safety and well-being / Our approach	82, 103				
	403-10 Work-related ill health	Appendices / ESG Key Performance Indicators (KPIs)	103				
Protection an	d promotion of human rights - Non-material issue						
406: Non-Discrimi- nation 2016	406-1 Incidents of discrimination and corrective actions taken	People / Protection and promotion of human rights / Our approach					
Additional to	pic-specific Indicators						
N/A							

8.4 Table of ESG Metrics-Athens Stock Exchange ESG Reporting Guide 2022

The ATHEX ESG Reporting Guide was created in 2019, was updated in 2022, and constitutes a tool through which companies disclose non-financial information, in accordance with the proposed core, advanced and sector specific ESG metrics. The Guide helps listed companies to develop their ESG performance, and to communicate effectively with investors.

ESG Classification	ID	Metric Title	Report Reference	Page
CORE METRICS				
Environmental	C-E1	Scope 1 emissions	Environment / Our contribution to tackling climate change / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	90
	C-E2	Scope 2 emissions	Environment / Our contribution to tackling climate change / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	90
	C-E3	Energy consumption and production	Environment / Our contribution to tackling climate change / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	91
Social	C-S1	Stakeholder engagement	Sustainable Development Approach / Stakeholder Engagement	14
	C-S2	Female employees	People / Protection and promotion of human rights / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	87, 104
	C-S3	Female employees in management positions	People / Protection and promotion of human rights / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	87, 104
	C-S4	Employee turnover	People / Contribution to employment / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	75
	C-S5	Employee training	People / Contribution to employment / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	77
	C-S6	Human rights policy	People / Protection and promotion of human rights / Our approach	86
	C-S7	Collective bargaining agreements	People / Contribution to employment / Our approach	73
	C-S8	Supplier assessment	Governance / Ensuring regulatory compliance and business ethics / Our approach	33
	C-G2	Sustainability oversight	Governance / Corporate Governance	23
Governance	C-G3	Materiality	Sustainable Development Approach / Materiality Analysis	17
	C-G4	Sustainability policy	Sustainable Development Approach / Sustainable Development Policy	12
	C-G5	Business ethics policy	Governance / Ensuring regulatory compliance and business ethics / Our approach	30
	C-G6	Data security policy	Governance / Ensuring regulatory compliance and business ethics / Our approach	32

ESG Classification	ID	Metric Title	Report Reference	Page
ADVANCED METRICS				
	A-E1	Scope 3 emissions	Environment / Our contribution to tackling climate change / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	42, 90
Environmental	A-E2	Climate change risks and opportunities	Environment / Our contribution to tackling climate change / Our approach	42, 44
	A-E3	Waste management	Environment / Soil / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	57, 98
	A-S1	Sustainable economic activity	Environment / Taxonomy Report	59
	A-G1	Business model	Profile / Business model	10
Social	A-G2	Business ethics violations	Governance / Ensuring regulatory compliance and business ethics / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	32
	A-G3	ESG targets	Environment / Soil / Our approach	42
Governance	A-G5	External assurance	Appendices / About this sustainable development report	105
SECTOR-SPECIFIC MI	ETRICS			
	SS-E1	Emissions strategy	Environment / Our contribution to tackling climate change / Our approach	42
Environmental	SS-E3	Water consumption	Environment / The protection of biodiversity and preservation of local ecosystems / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	92, 94
	SS-E6	Backlog cancellations	People / Creation and distribution of direct and indirect economic value / Our approach	64
	SS-S2	Customer privacy	Governance / Ensuring regulatory compliance and business ethics / Our approach	32, 89
	SS-S6	Health and safety performance	People / Promoting health, safety and well-being / Our approach, Appendices / ESG Key Performance Indicators (KPIs)	82
Social			Message from the CEO	
	SS-S10	ESG integration in business activity	Sustainable Development Approach / Sustainable Development Policy	3, 12, 59
			Environment / Taxonomy Report	
	SS-G1	Whistleblower policy	Governance / Ensuring regulatory compliance and business ethics / Our approach	28
Governance	SS-G2	Critical risk management	Emergency situations - Business Continuity	34

8.5 SASB Index - Electric Utilities & Power Generators 2018

Topic	Code	Accounting metric	Reference	Page
Greenhouse gas emissions and energy resource planning	IF-EU-110a.1	(1) Gross global Scope 1 emissions, percentage covered under(2) emissions-limiting regulations, and(3) emissions-reporting regulations	Environment / Our contribution to tackling climate change / Our approach Appendices / ESG Key Performance Indicators (KPIs)	90
	IF-EU-140a.1	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Environment / The protection of biodiversity and preservation of local ecosystems / Our approach Appendices / ESG Key Performance Indicators (KPIs)	92, 94
Water management	IF-EU-140a.2	Number of incidents of non-compliance associated with water quantity and/or quality permits, standards, and regulations	Environment / Our contribution to tackling climate change / Our approach Appendices / ESG Key Performance Indicators (KPIs)	94
Workforce Health & Safety	IF-EU-320a.1	1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR)	People / Promoting health, safety and well-being / Our approach Appendices / ESG Key Performance Indicators (KPIs)	103
Activity metric	IF-EU-000.D	Total electricity generated, percentage by major energy source, percentage in regulated markets	Environment / Our contribution to tackling climate change / Our approach	47







