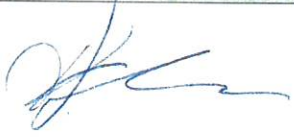

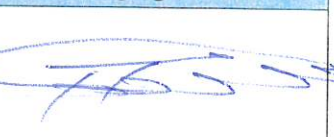


HUMAN RIGHTS POLICY

HUMAN RIGHTS POLICY

	Composition	Issue	Approval
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Position	Group HR Director	Compliance Officer	Managing Director
Signature			

Revision History

Issue No	Date	Description	Paragraphs
00	09.2021	Initial Issue	
01	01.06.2022	Reference to the new standard ISO 37301:2021 Update of the complaints and grievance mechanism	2b 5

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HUMAN RIGHTS POLICY

1. PURPOSE

We at TERNA ENERGY recognize the importance of respecting internationally recognized human rights, as the foundation of responsible business conduct, and part of our contribution to sustainable development.

The purpose of this policy, which is developed based on the UN Guiding Principles on Business and Human Rights, is to express our commitment to respect internationally recognized human rights and acknowledge our responsibility to identify, assess and manage potential human rights impacts to our stakeholders, across our value chain and our operations.

2. SCOPE OF APPLICATION

The policy covers all countries where TERNA ENERGY operates, and identifies human rights per stakeholder group categories, across our value chain, as follows:

a. Human rights relevant to **our employees, other workers, subcontractors and suppliers**:

- The right to fair and favorable working conditions
 - At TERNA ENERGY we provide equal opportunities to all employees. All actions concerning employees, such as promotions, remuneration, transfers to other departments, participation in groups etc., are based exclusively on meritocracy criteria related to performance, abilities, efficiency, effectiveness, and competence of each employee.
 - All employees at TERNA ENERGY must treat their colleagues, partners and suppliers with fairness and respect and not exclude them from the company's procedures, provided they meet the requirements and conditions of cooperation.
- The right of all employees to enjoy the highest possible level of physical and mental health. This is ensured through the following actions:
 - Implementation of a Certified Management System based on ISO 45001 international standard requirements.
 - Implementation of a Health and Safety Plan for all projects.
 - Preparation of an Occupational Risk Assessment Study based on current legislation for all facilities.
 - Carrying out inspections at facilities and construction sites by competent personnel, safety technicians, occupational physicians and monitoring the implementation of legislation and changes in the legislative/regulatory framework.
 - Implementation of Safety Instructions for the execution of dangerous works.
 - Systematic implementation of personnel training programs.
 - Provision of first aid in case of injury.

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- Consultation with employees.
- Evaluation of compliance with the legislative and regulatory requirements
- Monitoring of the results of H&S Governmental Authorities Inspections by the Quality, Health-Safety and Environment department and sending of appropriate documents and reports when required.
- Evaluation of suppliers and subcontractors.
- Establishment of a procedure for the determination of HSE requirements for suppliers and subcontractors and monitoring of its implementation.
- Guarding of facilities and visitors thermo-metering.
- Continuous contact and informing from the Official Health Governmental Authorities (E.O.D.Y / WHO) and Health and Safety Governmental Authority (SEPE/ELINYAE).
- A written Occupational Risk Assessment for pandemic crisis.
- Drafting of Internal Regulations & Operating Instructions for the implementation of pandemic preventative measures under the supervision of the Incident Management Body and the H&S Directorate.
- Increased presence of Occupational Physicians.
- All employees of TERNA ENERGY are provided with an additional private health insurance contract.
- Provision of necessary sanitary and technical equipment.
- Installation of special hazardous waste collection bins.
- The right to be free from discrimination
 - TERNA ENERGY, as defined in the Code of Conduct, does not allow any kind of discrimination based on gender, race, religion, social and cultural background status, political beliefs, sexual orientation, gender identity or gender expression, marital status, ethnicity, nationality, age, union membership, physical and mental disability, or any other kind of discrimination. In parallel, the company is committed to the prevention of discrimination in all areas of working life.
 - TERNA ENERGY respects and protects the rights of minorities and women.
 - TERNA ENERGY is certified by ELOT 1439: 2013 as an “Organization friendly to citizens with disabilities – Requirements and recommendations”.
- The right to freedom of association
 - TERNA ENERGY recognizes the right of employees to bargain collectively
- The right to be free from slavery and forced or compulsory labor.

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- At TERNA ENERGY there is no forced labor or conditions of slavery.
 - At TERNA ENERGY we base our working relationships on mutual respect, transparency, integrity and justice.
 - We create a working environment in which we can express our ideas, beliefs, and views. We encourage honest and two-way communication for all matters related to the activities of the company.
 - At TERNA ENERGY we do not allow any kind of intimidation, harassment, or aggressive behavior in our working environment.
- Children rights.
 - TERNA ENERGY does not employ anyone under the age of 18.
 - The right of access to safe water for human consumption and sanitary use
- b. Human rights relevant to our **clients and end users**
- The right to privacy. This is secured through the following actions:
 - Personal data is subject to legal, fair, and transparent processing.
 - Personal data is collected only for specific, clear, and legal purposes.
 - Personal data must be adequate, relevant and limited to what is necessary for processing.
 - Personal data must be accurate and up to date and efforts must be made to delete or correct it without delay.
 - Personal data is kept in such a way that the subject of the data can only be identified if it is necessary for processing.
 - Personal data is processed in a secure manner.
 - The controller can demonstrate compliance with the other principles of the GDPR (Accountability Principle).
 - Maintaining of Back up and security systems
 - Implementation of information security management system - ISO 27001
 - The avoidance of bribery and corruption. This is ensured through:
 - Establishment and implementation of an Anti-Corruption and Anti-Bribery Policy
 - Establishment and implementation of an Anti – Bribery Management System according to the requirements of the standard ISO 37001:2016
 - Establishment and implementation of a Compliance Management System according to the

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requirements of ISO 37301:2021.

c. Human rights relevant to the **local communities** in which TERNA ENERGY operates.

- The right to a safe, clean, healthy, and sustainable environment. This is ensured through the following actions:
 - Preparation of an Environmental Impact Study for each project
 - Implementation of the approved environmental terms
 - Implementation of an Environmental Management System according to the requirements of ISO 14001 standard
 - Frequent inspections to monitor environmental issues
 - Analysis, assessment and monitoring of environmental aspects and impacts
 - Waste management through licensed companies and collection systems
 - Preparation and implementation of Emergency Plans
 - Training of employees in environmental protection issues
 - Adequacy of fire safety systems and monitoring and measuring equipment for environmental parameters.
 - Availability of spill kits and oil leakage protection systems
 - Implementation of environmental protection measures in accordance with the approved environmental terms and the requirements of Law 4042/12
 - Analysis and assessment of environmental aspects and impacts and implementation of relevant monitoring programs
 - Identification of the interests of environmental organizations for each project undertaken by the company by implementing the Risk Assessment Procedure and formulating a relevant action plan if required
 - Monitoring in collaboration with the Marketing & CSR Department of the Group
 - Issuance of Annual Corporate Social Responsibility Report
 - Installation and implementation of the Eco-Management and Audit Scheme (EMAS)
 - Monitoring of changes in the legal framework
 - Evaluation of compliance with legislative and regulatory requirements and performance of risk analysis
 - Designation of a department responsible for the monitoring and renewing of licenses

- The respect for the lights of local communities. This is ensured through:
 - Monitoring of the interests of the local and wider community

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- Media Management
- Preparation of a Corporate Social Responsibility Report which is also available in the company's website

3. POLICY ALIGNMENT

The policy is based on the United Nations Guiding Principles on Business and Human Rights, taking also into consideration the following:

- United Nations Universal Declaration of Human Rights/The International Bill of Human Rights
- United Nations International Covenant on Civil and Political Rights
- United Nations International Covenant on Social, Economic and Cultural Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact Principles
- ILO Declaration on Fundamental Principles and Rights at Work
- United Nations Resolution 46/7 on Human Rights and the Environment
- Voluntary Principles on Security and Human Rights
- The Business and Human Rights Resource Centre Benchmark for Renewable Energy & Human Rights

4. ROLES AND RESPONSIBILITIES

- The responsibility for the preparation, annual review and monitoring with the Human Rights Policy belongs to the Quality, Health-Safety and Environment department of TERNA ENERGY which reports directly to the CEO. The Quality, Health-Safety and Environment department cooperates with the Human Resources Department and the Legal Department to collect the data required for monitoring.
- The Human Rights Policy is approved by the CEO of TERNA ENERGY

5. COMPLAINT AND GRIEVANCE MECHANISM

The Human Rights Policy is covered by the complaint and grievance mechanism of TERNA ENERGY.

Each employee, supplier, customer or any other interested party can report issues related to the implementation of the Code of Conduct, either anonymously or by name through:

- E-mail to the electronic address compliance@terna-energy.com
- The platform <https://ternaenergy.integrityline.com/frontpage>
- A letter addressed to: "TERNA ENERGY S.A." 85, Mesogeion Ave., Athens 115 26, Greece, for the attention of the "Regulatory Compliance Unit" of the Company, with the indication "Confidential".