

## POLICY FOR HUMAN RIGHTS

### 1. Preamble

PPA S.A. (hereinafter “PPA” or “the Company”) recognizes the importance of safeguarding and promoting the fundamental rights and dignity of individuals, both within the company and across its broader sphere of influence.

The Company is committed to respecting, protecting, and advancing human rights in all its activities, operating with legality, integrity, transparency, and social responsibility.

This Human Rights Policy sets out the core principles and commitments that govern the Company’s approach to respecting human rights, in accordance with international standards, EU law, and applicable Greek legislation.

### 2. Purpose and Application Scope

The purpose of this Policy is the practical integration of the commitment to respect human rights into the Company’s operational processes, internal control systems, decision-making, and strategic planning. This Policy aims to ensure that the Company operates in a manner that prevents, identifies, assesses, and effectively addresses any potential adverse impacts on human rights that may arise from its activities.

The Policy is adopted by decision of the competent corporate body and applies to all Company personnel, regardless of hierarchical level, status, or form of employment, including, indicatively and not exhaustively, employment relationships, independent service agreements, salaried mandates, or any other contractual relationship. Furthermore, the principles and requirements of this Policy apply to and bind, to the extent feasible and in accordance with applicable law and contractual terms, all suppliers of goods and services, contractors and subcontractors, partners, consultants, and external collaborators, as well as any natural or legal person conducting business with the Company, with the aim of ensuring consistent, responsible, and lawful business conduct throughout the entire value chain. It also contributes to the Company’s overall sustainable development strategy through its concurrent

implementation alongside other procedures and policies that more broadly govern the Company's business activities.

### 3. Respect for Human Rights

The Company's Policy is guided by the international human rights principles contained in:

- i. the Universal Declaration of Human Rights, adopted by the United Nations General Assembly on 10 December 1948,
- ii. the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as adopted at the 86th Session of the International Labour Conference (1998) and amended at the 110th Session (2022),
- iii. the UN Global Compact, established in July 2000, which calls on businesses to align their operations and strategies with ten universally accepted principles in the areas of human rights, labour standards, the environment, and anti-corruption,
- iv. the United Nations Guiding Principles on Business and Human Rights,
- v. the Constitution of Greece,
- vi. the OECD Guidelines for Multinational Enterprises,
- vii. and the applicable EU and national legislation.

The Policy includes, in particular, the safeguarding of conditions of fair and dignified work, the maintenance of a healthy and safe working environment, the promotion of equal treatment and equal opportunities without discrimination, the right to family life, the right to unionization, the right to privacy, transparency and communication, as well as the prohibition of child labour, forced labour, and human trafficking.

Respect for Human Rights constitutes a principle of utmost importance for the Company, which is committed to protecting and promoting their respect across the full spectrum of its operations. This commitment is further reflected through a series of the Company's Regulations, Policies, and Procedures, which are aligned with and applied in combination with this Policy. These include, among others, the following already approved documents of PPA S.A.:

- General Staff Regulation
- Code of Conduct

- Sustainability Policy
- Diversity, Equality & Inclusion Policy
- Code against Corruption and Bribery
- Whistleblowing Policy
- Policy to prevent and combat violence and harassment at work & for the management of internal complaints about incidents of violence and harassment
- Contingency Plan for emergencies
- Health and Safety Regulation
- Health and Safety Regulation Container Terminal
- Contingency Plan of the PPA SA Car Terminal Department
- Recruitment Process
- Regulation for the age completion compulsory retirement of PPA SA personnel
- Regulation for the granting of short-times leaves to the employees of PPA S.A. due to extraordinary cases or special needs beyond the provisions of the General Staff Regulation
- Personnel Training Policy
- Privacy Policy of PPA SA

#### **4. Article 2 of the Universal Declaration of Human Rights**

The Company respects, adopts, and fully implements the provisions of the Universal Declaration of Human Rights of the United Nations General Assembly, and specifically Article 2, which states: *“Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.”*

## **5. Right to a safe workplace (favourable working conditions, physical and mental health, freedom of thought, opinion and expression)**

The Company, recognizing the protection of health and safety in the workplace for its employees as a major priority, adopts regulations and policies that govern a working environment focused on accident prevention, the handling of any such incidents, the maintenance of strict health and safety standards, and the anticipation, assessment and management of potential risks. It also employs an occupational doctor and a safety engineer, while it contracting ambulances for the provision of emergency services within the Port Zone. At the same time, it has established comprehensive safeguards to ensure that its employees retain the right to freedom of thought, opinion and expression, enabling them to contribute to the prevention and handling of incidents related to physical and mental health and safety in the workplace, whether as observers or as individuals affected by any potential failures.

## **6. Right to freedom from discrimination – equal opportunities**

Respecting the fundamental principles of *diversity, equality and inclusion*, the Company ensures that its employees fully enjoy these rights through the provision of equal opportunities and a zero-tolerance approach to any form of discrimination. It has established a regulated working environment with dedicated communication channels, enabling all employees to safely and confidentially report any such incidents.

## **7. Right to free participation in collective bodies**

The Company's employees hold the fundamental right to freely participate in trade union bodies and collective bargaining, without fear or suspicion of retaliation or adverse treatment. The Company is committed to maintaining a constructive dialogue with the representatives of these trade union bodies.

## **8. Right to social security**

The Company ensures that its employees receive benefits related to their health even outside the workplace, such as private health insurance through a dedicated insurance policy, the provision of sick leave, as well as other special forms of support and facilitation.

## **9. Right to privacy**

Recognizing the special handling that the privacy right requires, the Company takes all technical and organizational measures prescribed by law to ensure the protection of personal data. It has appointed a Data Protection Officer (DPO), and has in place a Personal Data Policy as well as additional Policies—such as the CCTV Policy and the Cookies Policy—which safeguard the rights and protections that legally arise from the right to privacy.

## **10. Right to family life**

The Company is also committed to protecting the right to family life, ensuring support for its employees through various forms of facilitation, such as a wide range of family allowances, special leave for reasons related to parental care and other family circumstances, family-oriented events, and additional measures aimed at achieving a balance between professional and family life.

## **11. Child labour, forced labour and human trafficking**

The Company is committed to and fully aligned with all applicable international, EU and national regulations regarding minimum age requirements for the employment of workers across the full range of its activities. It does not, under any circumstances or for any reason, compel any individual to engage in any form of forced labour, compulsory labour or human trafficking. This principle applies without exception to all areas of the Company's operations.

## 12. Transparency and Communication – Reporting channels within PPA S.A.

The Company, respecting transparency and freedom of communication, implements best practices for managing complaints and any potential rights violations, aiming both to ensure compliance with the applicable regulatory framework and to strengthen the trust of its customers, partners, employees, investors, and supervisory authorities.

There are three communication channels within the Company:

	<b>SUBJECT</b>	<b>COMMUNICATION CHANNELS</b>
1/	<b>VIOLENCE AND HARASSMENT AT WORKPLACE</b>	<ul style="list-style-type: none"> <li>– <a href="mailto:odk@olp.gr">odk@olp.gr</a></li> <li>– In person</li> <li>– By post (Named or Anonymous)</li> </ul>
2/	<b>WHISTLEBLOWING</b>	<ul style="list-style-type: none"> <li>– <a href="mailto:whistleblowing@olp.gr">whistleblowing@olp.gr</a></li> <li>– Relevant boxes</li> <li>– By post (Named or Anonymous)</li> </ul>
3/	<b>CLIENT SERVICE</b>	<ul style="list-style-type: none"> <li>– <a href="mailto:clientservice@olp.gr">clientservice@olp.gr</a></li> </ul>

## 13. Monitoring and control

The present Policy may be audited by the Internal Audit Department and/or the Regulatory Compliance Unit with regard to its implementation.

The Policy is updated, following a relevant recommendation, by decision of the competent corporate body.

PPA SA Policy for Human Rights		
	<b>Decision No</b>	<b>Decisive Body</b>
Initial Version		