

# Sustainable Development Report 2023

**COORDINATOR**  
Division of Corporate Social Responsibility  
and Sustainable Development

[www.terna-energy.com](http://www.terna-energy.com)



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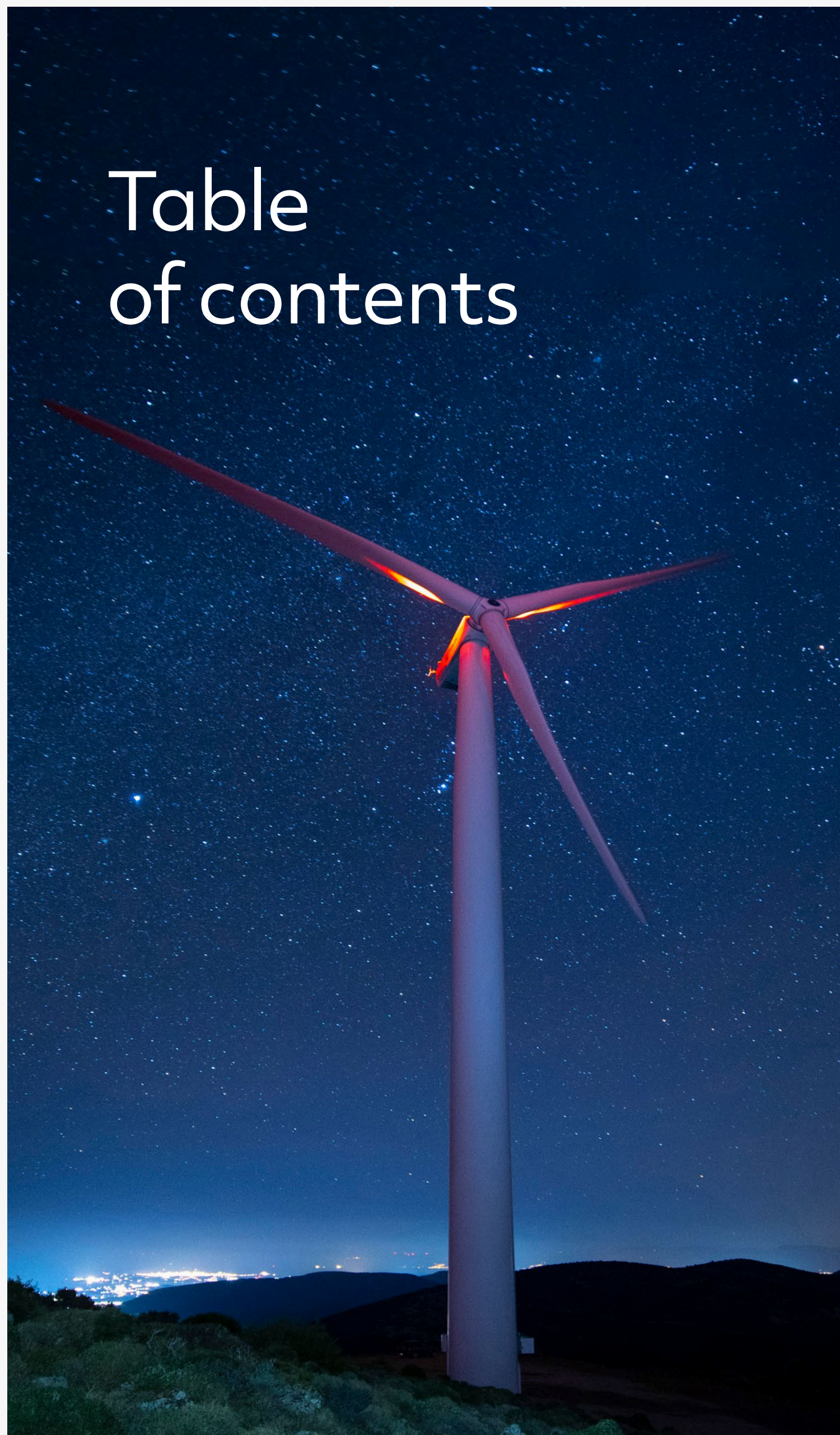
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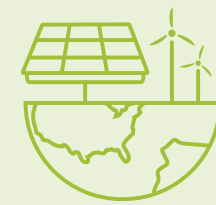
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The following summary provides an overview of TERNA ENERGY Group's performance on environmental, social, and governance (ESG) issues in 2023, as well as its priorities and targets for 2024.

Value creation is a top priority for our Group. In the context of promoting sustainable development and accelerating the green transition, we are committed to implementing projects that will contribute to the modernization of the country.

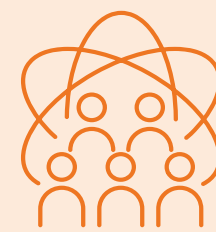
This commitment reflects our dedication to promote innovation, protect the environment, and create long-term value for our stakeholders and the broader society.

## 2023 ESG highlights



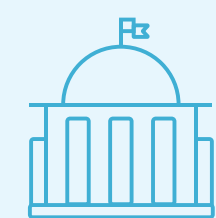
### Environment

- **100%** green electricity generated
- Prevention of **1,079,844 t** CO<sub>2</sub>e emissions
- Installation of **wildlife protection** systems and implementation of wildlife monitoring programs during project construction and operation
- Completion of our review of the **TCFD** (Task Force on Climate-related Financial Disclosures) recommendations
- Registration of TERNA ENERGY in the **EU EMAS** Register
- **357** hours of staff training on environmental issues
- **60** internal and external audits



### Society

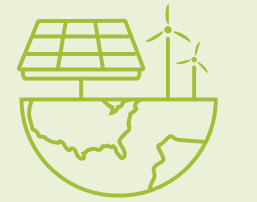

- **€6.5 million** in compensatory benefits to municipalities where the Group operates, corresponding to 3% of gross project revenues
- **€4.3 million** allocated to the Group's social support program
- **3,842 hours** of staff training
- **Full compliance** with the requirements and recommendations of ELOT 1439:2013 «Organization friendly to people with disabilities - Requirements and recommendations» standard
- **Zero incidents** of human rights violations or discrimination



### Governance

- **Policy** against violence and harassment in the workplace
- **Zero incidents** of personal data security breaches
- **82.5%** domestic suppliers
- **€218.9 million** in investments

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Sustainability Topics	Material Topics	2023 Targets	Progress per target	2024 Targets	
 <b>Environment</b>	Climate change	Climate change adaptation	-	New Target	Conduct climate risk assessment for the Group's facilities on an annual basis.
		Climate change mitigation	Maintain and/or improve the received rating from the international organization CDP (Carbon Disclosure Project).		Maintain and/or improve the received rating from the international organization CDP (Carbon Disclosure Project).
			Use of 100% of Green electricity in Greece.		Use of 100% of Green electricity in Greece
	Energy	Maintain high performance in energy savings and promotion of RES.		Maintain high performance in energy savings and promotion of RES.	
		-	New Target	Plan actions to improve energy efficiency of the Group's facilities.	
		Pollution	Air pollution	At least one audit on environmental compliance per facility.	
Maintain zero incidents of non-compliance with environmental licenses, standards and regulations.				Maintain zero incidents of non-compliance with environmental licenses, standards and regulations.	
-	New Target			Maintain a high rate of environmental training for all Group employees.	
Biodiversity and ecosystems	Biodiversity and ecosystems	Biodiversity and soil restoration, where required due to business activities.		Biodiversity and soil restoration, where required due to business activities.	
		Wildlife protection and conservation.		Wildlife protection and conservation.	
		Maintain zero environmental incidents related to the protection of biodiversity.		Maintain zero environmental incidents related to the protection of biodiversity.	
Resource use and circular economy	Waste	Minimize storage time of generated waste in Group facilities.		Minimize storage time of generated waste in Group facilities.	
		Zero environmental incidents related to waste management.		Zero environmental incidents related to waste management.	
		Maintain the implementation of an integrated recycling system with the use of special collection bins for each waste stream and raise awareness among employees.		Continuous awareness raising of the Group's employees on proper waste management and recycling practices.	



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Sustainability Topics	Material Topics	2023 Targets	Progress per target	2024 Targets
Own workforce	Working conditions for the Group's workforce	Implement recruitment within the timeframe of project needs.		Implement recruitment within the timeframe of project needs.
		Zero work-related accidents.		Zero work-related accidents.
		Zero breaches of Health and Safety legislation.		Zero breaches of Health and Safety legislation.
		Conduct at least one Health & Safety compliance audit per facility.		Conduct at least one Health & Safety compliance audit per facility.
		Establish a culture on Health and Safety issues among employees through systematic training (on both general and specific topics), coupled with strategic initiatives (e.g., Lessons Learned, Newsletters, Campaigns, and Consultations).		Enhance the culture on Health & Safety issues among employees.
		Conduct evacuation drills of wind turbines in operating wind farms.		Conduct evacuation drills of wind turbines in operating wind farms.
		Ensure adequate allocation of financial and human resources to maintain a high level of Health & Safety.		Ensure adequate allocation of financial and human resources to maintain a high level of Health & Safety.
		Continuous consultation between Management and employees on Health & Safety issues.		Continuous consultation between Management and employees on Health & Safety issues.
		Strengthen individual training plans by upgrading training courses (€/trainee).		Maintain individual training plans and upgrade training courses (€/trainee).
		Increase Soft Skills training for all employees.		Maintain Soft Skills training for all employees.
		Training on New Technologies for all employees.		Training on New Technologies for all employees.
		Training on Human Rights for all employees.		Training on Human Rights for all employees.
		Empower young people through internships and increase their absorption rate by the Group.		Empower young people through internships and increase their absorption rate by the Group.
Workforce in the value chain	Working conditions for the workforce in the value chain	-	New Target	Conduct regular audits to maintain required working conditions for all human resources in the value chain.
Affected communities	Economic, social and cultural rights	Continue and further strengthen the Group's social support program with substantial actions that maximize its social footprint.		Maintain and further strengthen the Group's social support program with substantial actions that maximize its social footprint.



Sustainability Topics	Material Topics	2023 Targets	Progress per target	2024 Targets
Business conduct	Corporate culture	Maintain zero incidents of corruption.		Maintain zero incidents of corruption.
		Maintain zero incidents of non-compliance with the legislative and regulatory framework.		Maintain zero incidents of non-compliance with the legislative and regulatory framework.
		Maintain zero fines and/or non-monetary penalties for non-compliance with laws and/or regulations relating to the Group's business operations and activities.		Maintain zero fines and/or non-monetary penalties for non-compliance with laws and/or regulations relating to the Group's business operations and activities.
Business continuity	Business continuity	Conduct at least one emergency preparedness exercise annually.		Conduct at least one emergency preparedness exercise annually.
		Continuous training of employees on effective management of emergency situations (e.g., accident, fire, heat stress, etc.).		Continuous training of the facilities' Emergency Response Teams on the effective management of emergencies.
		Secure resources for the supply of proper equipment for managing emergency situations (e.g., medical supplies, Personal Protective Equipment, etc.).		Secure resources for the supply of proper equipment for managing emergency situations (e.g. medical supplies, Personal Protective Equipment, defibrillators, etc.).
		Identify and promptly address internal and external factors that could potentially lead to disruption of business activity.		Identify and promptly address internal and external factors that could potentially lead to disruption of business activity.
Value creation	Value creation	Maintain high performance in environmental compliance and legislative and regulatory alignment regarding the protection of the environment, biodiversity, and cultural heritage by incorporating new technologies.		Maintain high performance in environmental compliance and legislative and regulatory alignment regarding the protection of the environment, biodiversity, and cultural heritage by incorporating new technologies.
		Further increase the economic value generated by the Group.		Increase of the Group's positive socio-economic footprint in the Greek economy and employment.



# 02 Message from the CEO

In today's challenging and ever-changing geopolitical environment, contribution to the creation of a "Green GDP" at a national and global level is imperative. This is the very essence of the transition to green energy: designing and implementing policies, strategies, plans and measures that not only deliver measurable environmental and climate benefits, but also reduce energy costs while contributing to economic growth.

Under this objective, TERNA ENERGY is a leading player in Greece's effort to transform into a strong green energy hub in SE Europe. Our Group is the largest producer and investor of clean energy in the broader region of SE Europe with a total capacity of projects in operation, under construction and ready for construction now amounting to 2.5GW.

In 2023, we continued to design and implement projects that contribute to tackling the climate crisis, energy safety/independence, and reducing energy prices at national and EU level. It was a year of significant growth for us, as our Group's installed capacity reached 1.2GW and profitability increased by 10%.

We recently commissioned the country's largest wind farm of 330MW at Kafireas in Evia, while the construction of our flagship pumped hydropower storage project of 680MW in Amfilochia is in full development. At the same time, the Group is proceeding with one of the first two exploration licenses for the development of Pilot Offshore Wind Farms in Greece.

With our 9<sup>th</sup> Sustainability Report 2023, we want to highlight how our responsible business operations and the projects we implement contribute to the transition to a sustainable energy future and a climate-neutral economy.

## Sustainable development and governance

Sustainable Development is the driving force of our Group's business activities placing criteria based on ethics, quality, innovation, high technology and expertise at its core. Starting from our business operations and continuing with targeted actions for society and the environment, we support the United Nations' Sustainable Development Goals and work towards creating maximum value for all stakeholders.

The double materiality assessment, conducted for the first time this year in accordance with the requirements of EU legislation (Corporate Sustainability Reporting Directive), is a significant step in meeting current demands of the investment community and our stakeholders. Through this process, the assessment of material topics apart from the criterion of their impact on sustainable development, also includes the criterion of their impact on the Group's financial performance and overall business strategy. These topics are presented in detail in this report and will be taken into account in our corporate strategy.

## Environmental care

In 2023, our Group's RES facilities produced a total of 2,596GWh of green energy, which was distributed to the national and European electricity transmission system, contributing to the reduction of greenhouse gas emissions from conventional power generation sources by approximately 1.08Gt CO<sub>2</sub>e.

Moreover, we obtained Guarantees of Origin for all the electricity consumed within our organization, achieving zero Scope 2 indirect GHG emissions (market-based). We also participated in the Carbon Disclosure Project (CDP) platform for yet another year, obtaining a B score (A-D scale) affirming our commitment to sustainability and environmental governance.

## People and society

Value generation and distribution to the economy and society is a key factor of our business success.

In 2023, we supported Greek society once again, with a significant social support program amounting to €4.3 million, marking an increase in these expenditures by approximately 18% compared to 2022, while compensatory benefits to the municipalities where our Group operates exceeded €6.5 million.

In the upcoming fall we will complete the design of the Greek RES Centre for the first energy autonomous island through RES in Greece, Agios Efstratios, contributing to energy security and improving the quality of life of its residents.

At the same time, we consistently invest in our people and in creating a safe working environment. This year we increased our staff training hours to approximately 4,000 and we continue to conduct regular audits and inspections at all our facilities.

## Shaping a responsible market

For yet another year, our Group continued the seamless implementation of its investment program, with ongoing investment activities aiming in creating the conditions for stabilizing increased revenue and profitability on a long-term basis.

In this context, in 2023 our green investments amounted to €219 million, 95% of which is fully aligned with the requirements of the EU Taxonomy Regulation. We also implemented our new Procurement Policy, ensuring our suppliers' compliance with ESG criteria we have set, thereby greening our value chain and the broader procurement market in our industry.

With our present 9<sup>th</sup> Annual Sustainability Report, we evaluate the achievements of the past year and set new ambitious goals for the future, focusing on areas that need improvement and strengthening practices that have proven to be effective. In this way, we move with confidence towards new higher goals, creating a better and sustainable future for all, based on continuous development and optimal adaptation to new challenges. Our driving force in this effort is our people, who with their daily contribution create the foundations for continuous innovation and a new dynamic framework for sustainable development, generating added value for all our stakeholders.

**Emmanouel Maragoudakis**  
CEO, TERNA ENERGY Group

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# 03 Sustainable Development



TERNA ENERGY Group’s growth is based on the principles of Sustainable Development. With a business plan that aligns with climate change mitigation, promoting the circular economy and improving energy management, the Group significantly contributes to sustainable development and the implementation of the United Nations Sustainable Development Goals (SDGs).

Our mission is to create value and prosperity for our stakeholders, while fostering a trusted relationship with them.

**In the context of achieving corporate responsibility, the Group defines four key activity pillars:**

-  Environmental protection
-  Promotion of human value
-  Enhancing our social footprint
-  Shaping a responsible market

We actively support all 17 United Nations SDGs.

# SUSTAINABLE DEVELOPMENT GOALS





GRI 2-12, 2-13, 2-14 | ATHEX ESG C-G2, C-G4, SS-S10

# 3.1 Sustainable Development Policy

The Group has mechanisms in place to manage and address sustainability issues, which are reflected in our Sustainability Policy. The policy is an important channel of communication with the Group's stakeholders and helps to understand and integrate their expectations into our business model.

The purpose of the Policy is to always ensure that value is created for society, the Group and its stakeholders, with the minimum possible impact on the environment, following best practices and sustainability initiatives.

In this context, actions are formed and strategic decisions are taken for the environment, society and the economy in full alignment with the UN Sustainable Development Goals (SDGs). At the same time, the Group sets relevant targets and implements processes evaluated and monitored through specific Key Performance Indicators (KPIs).

The Group seeks to develop its business activities, while improving the social, economic and environmental conditions in the areas where it operates.



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GRI 2-29 | ATHEX ESG C-S1

## 3.2 Our Stakeholders

Recognizing stakeholders as the entities that directly or indirectly impact or are impacted by our Group's business operations, either in a positive or negative manner, we prioritize building a relationship of mutual trust and understanding, acknowledging their requirements and incorporating them in our business model.

The Group has communication and cooperation mechanisms in place for its stakeholders. The frequency of communication varies based on the nature of the relationship with each stakeholder. This open dialogue promotes transparency and strengthens relations of mutual trust and understanding.

The following table presents the main categories of the Group's stakeholders, the methods and frequency of communication with them.



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Stakeholder groups	Communication mechanism	Frequency of communication
Group Management	Regular meetings and updates	Ad hoc
Employees	Regular meetings and updates	Ad hoc
	Company announcements	Ad hoc
	Internal communication (email, newsletter, intranet)	Ad hoc
	Website	Ad hoc
	Company events	Ad hoc
	Social media	Weekly
	Financial Report	Quarterly
	Sustainable Development Report	Annualy
	Email	Ad hoc
	Phone	Ad hoc
Suppliers	Meetings	Ad hoc
	Financial Report	Quarterly
	Sustainable Development Report	Annualy
	Email	Ad hoc
	Company events	Ad hoc
Clients	Phone	Ad hoc
	Meetings	Ad hoc
	Website	Ad hoc
	Financial Report	Quarterly
	Sustainable Development Report	Annualy
	Phone	Ad hoc
	Meetings	Ad hoc
Government Agencies, State & Institutional Bodies	Email	Ad hoc
	Company events	Ad hoc
	Sustainable Development Report	Annualy
	Financial Report	Quarterly
	Phone	Ad hoc
Local Communities and Authorities	Website	Ad hoc
	Meeting	Ad hoc
	Email	Ad hoc
	Corporate announcements	Ad hoc
	Corporate events	Ad hoc
	Sustainable Development Report	Annualy
	Financial Report	Quarterly

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Stakeholder groups	Communication mechanism	Frequency of communication
Investors, Shareholders and Capital providers	Phone	Ad hoc
	Email	Ad hoc
	Meetings	Ad hoc
	Website	Ad hoc
	Corporate events	Ad hoc
	Social media	Weekly
	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Company publications and articles	Ad hoc
	Conferences and events	Ad hoc
Media	Surveys and corporate reports	Ad hoc
	Social Media	Ad hoc
	Personal communication	Ad hoc
	Website	Ad hoc
	Financial Report	Quarterly
	Sustainable Development Report	Annually
	Social media	Ad hoc
	Conferences and events	Ad hoc
	Corporate publications and articles	Ad hoc
	Financial Report	Quarterly
NGOs	Sustainable Development Report	Annually
	Website	Ad hoc
	Corporate publications and articles	Ad hoc
	Conferences and events	Ad hoc
	Studies and corporate reports	Ad hoc
Independent Evaluation and Audit Bodies	Financial Report	Quarterly
	Sustainable Development Report	Annually

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GRI 2-14, 3-1, 3-2, 3-3 | ATHEX ESG C-G3

# 3.3 Double Materiality Assessment

## Methodology

A long-standing objective of TERN A ENERGY Group is to create value for its stakeholders and broader society. Through the Double Materiality Assessment (DMA), the Group seeks to identify the effects of its business activities on the environment, society and the economy, as well as the risks and opportunities for the Group. The DMA was carried out for the first time this year and is fully aligned with the requirements of the 2021 Global Reporting Initiative (GRI) and the European Sustainability Reporting Standards (ESRS).

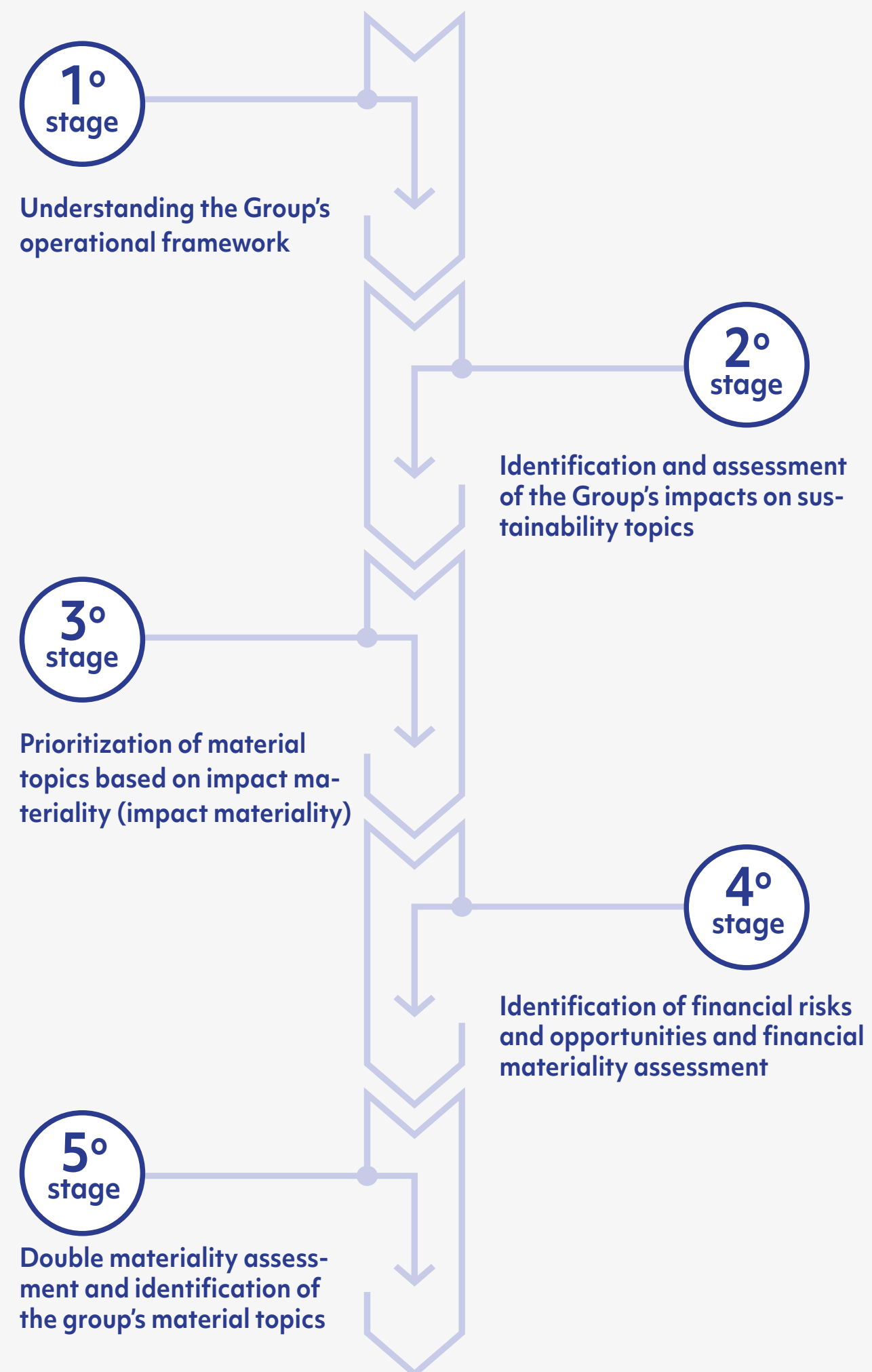


In the context of the DMA process, the Group's entire value chain for both the parent company and its subsidiaries was examined, taking into consideration latest trends and challenges in the broader socio-economic environment, as well as a series of international and sector-specific sustainable development standards, initiatives and data sources, which, in addition to the ESRS Reporting Standards of the CSRD, also include the GRI 2021 International Standards, the Athens Stock Exchange ESG Disclosure Guide, the SASB and MSCI reporting standards. Furthermore, the results of the benchmarking analysis of the material Sustainability topics of peers at European and national level were also utilized.





The DMA was conducted in five (5) stages:



### 1. Understanding the Group's operational framework

- Understanding of the business model, activities and business relationships in the Group's value chain. For this purpose, detailed mapping of the value chain was conducted and the connection between the Group's own operations, activities upstream and downstream was established.
- Identification of relevant sustainability topics taking into account the current CSRD sustainability reporting standards (ESRS), other non-statutory standards (GRI, SASB), requirements used by specialized indicators and assessment agencies (e.g. MSCI, ATHEX, etc.) and materiality results of peer companies operating in the EU and Greece.
- Identification and categorization of stakeholders that affect and/or are affected by the Group's operations.

### 2. Identification and assessment of the Group's impacts on sustainability topics

- Identification of the positive and negative (actual and potential) impacts arising from the Group's activities and business relationships for each identified ESG topic.
- Conducting a survey to evaluate the Group's impact on ESG topics with the participation of representatives of all stakeholder groups<sup>1</sup> and the distribution of relevant questionnaires.
- Evaluation of survey results, based on stakeholder responses.
- Scoring impacts based on the results of the survey and conducting relevant workshops with competent Group Departments.

### 3. Prioritization of material topics based on impact materiality (impact materiality)

- Prioritization of material ESG topics based on the assessment of actual and potential impacts of the Group's activities (impact materiality analysis).
- Setting materiality thresholds to determine the most significant topics based on the impact materiality analysis.

### 4. Identification of financial risks and opportunities and financial materiality assessment

- Identification of financial impacts that create risks and opportunities which could affect the Group's cash flows, growth and performance with respect to the identified ESG topics.
- Assessment of the risks and opportunities arising from the interactions of all external factors linked to the Group's financial performance, based on the likelihood of their occurrence and the magnitude of their potential financial impact.
- Setting materiality thresholds to determine the most important topics, based on the financial materiality analysis.

### 5. Double materiality assessment and identification of the group's material topics

- Integration of the results obtained from the impact materiality and the financial materiality assessment process.
- Evaluation of the results of the DMA.
- Validation of the material topics by the Group's Management. For this purpose, a dedicated meeting of the ESG Committee was conducted where the steps of the applied methodology, individual outcomes and the final list of material topics for 2023 were discussed.

<sup>1</sup>While conducting the survey, questionnaires were distributed to the following stakeholder groups: Senior Management, Employees, ESG Experts as defined by each company and external stakeholders (Suppliers & Partners, Financial Institutions, Institutional bodies).



### Criteria for assessing impacts, opportunities and risks

Impacts, opportunities and risks are scored according to specific criteria.

#### Scoring of impacts



##### Criteria for assessing positive (actual and potential) impacts:

- ✓ Scale
- ✓ Scope
- ✓ Likelihood



##### Criteria for assessing negative (actual and potential) impacts:

- ✗ Scale
- ✗ Scope
- ✗ Irremediable character
- ✗ Likelihood

#### Scoring of risks and opportunities

- Magnitude of positive and negative financial impacts
- Likelihood of opportunities and risks arising

Additionally, for all impacts, the time horizon over which these impacts are expected to occur (short, medium, long term) was identified.

### Impact Materiality

As part of the impact materiality analysis, the «inside-out» approach was implemented in order to assess the actual (existing) and potential positive and negative impacts of our activities on the environment, society and the economy. The creation of a corresponding questionnaire followed, that was distributed to our stakeholders in order to assess both the positive and negative impact of the parent company and its subsidiaries on the external environment.

The process of determining the degree of significance of stakeholders was conducted by the Group's Senior Management through a relevant questionnaire. The evaluation model used was based on the «Salience model», which considers the following parameters:

- **Power:** The ability of a stakeholder to influence the organization's actions - essentially their ability to impose their will.
- **Urgency:** The degree to which the stakeholder's requirements need immediate attention or relate to urgent action.
- **Legitimacy:** The degree to which the engagement of a stakeholder is deemed appropriate, taking into account the experience and/or expertise regarding the Group's activities and the interests they serve.



The results of the impact materiality assessment are presented in the table below.

#### Prioritization of Sustainability Topics based on Impact Materiality

Material topics	
Environment	<ul style="list-style-type: none"> <li>- Energy</li> <li>- Climate change adaptation</li> <li>- Climate change mitigation</li> <li>- Waste</li> <li>- Air pollution</li> <li>- Biodiversity and ecosystems</li> </ul>
Society	<ul style="list-style-type: none"> <li>- Access to green energy</li> <li>- Economic, social and cultural rights</li> <li>- Working conditions for the workforce in the value chain</li> <li>- Working conditions for the workforce</li> </ul>
Governance	<ul style="list-style-type: none"> <li>- Value creation</li> <li>- Corporate culture</li> <li>- Business continuity</li> </ul>
Other topics	
Environment	<ul style="list-style-type: none"> <li>- Resource inflows</li> <li>- Water pollution</li> <li>- Water Withdrawal – Consumption - Use</li> </ul>
Society	<ul style="list-style-type: none"> <li>- Equal treatment and opportunities for all</li> </ul>
Governance	<ul style="list-style-type: none"> <li>-</li> </ul>



## Financial Materiality

Based on the requirements of the European Sustainability Reporting Standards (ESRS), we conducted the financial materiality analysis of the identified ESG topics by applying the «outside-in» approach. The most significant risks and corresponding opportunities were identified and assessed, taking into account the potential impact on the Group's financial performance based on their likelihood and the potential magnitude of their financial impact.

The assessment considered scenarios or projections that could materialize in the future, as well as potential financial effects that are not reflected in the existing financial statements.

**The results of the financial materiality assessment are presented in the following tables.**



## Prioritization of Sustainability Topics based on Financial Materiality

Material Topics	
Environment	<ul style="list-style-type: none"> <li>- Climate change adaptation</li> <li>- Biodiversity and ecosystems</li> <li>- Resource inflows</li> <li>- Climate change mitigation</li> <li>- Waste</li> <li>- Energy</li> <li>- Air pollution</li> <li>- Water Withdrawal – Consumption - Use</li> </ul>
Society	<ul style="list-style-type: none"> <li>- Access to green energy</li> <li>- Working conditions for the workforce</li> <li>- Working conditions for the workforce in the value chain</li> </ul>
Governance	<ul style="list-style-type: none"> <li>- Value creation</li> <li>- Business continuity</li> </ul>
Other topics	
Environment	<ul style="list-style-type: none"> <li>- Water pollution</li> </ul>
Society	<ul style="list-style-type: none"> <li>- Equal treatment and opportunities for all</li> <li>- Economic, social and cultural rights</li> </ul>
Governance	<ul style="list-style-type: none"> <li>- Corporate culture</li> </ul>



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## Double Materiality

In order to identify the highly material sustainability topics, based on their impact and financial materiality for the Group, the final stage of the DMA process was conducted. During this final stage, the results of the previous stages were assessed in combination in order to conclude and finalize the prioritization of the Group's material topics.

The following table presents the final results of the DMA for 2023.

Material topic	Impacts	Impact Category	Impact Materiality	Financial Materiality	Double Materiality	Alignment with UN Sustainable Development Targets
Climate change adaptation	Adaptation to climate change, through the establishment of targets and the implementation of measures to reduce risks related to the external environment and the climate.	+				
	Inability to adapt to climate change, due to failure of taking appropriate measures to prevent and respond to extreme weather events.	-				
Climate change mitigation	Reducing greenhouse gas emissions through environmentally friendly initiatives, such as through the implementation of energy saving measures, internally in the Group.	+				
	Increase of greenhouse gas emissions from the Group's activity and no contribution to the achievement of the national emission reduction targets.	-				
Energy	Accelerating the transition to a more efficient and sustainable energy model, through the promotion of Renewable Energy Sources technologies.	+				
	Negative contribution to tackling climate change, due to increased use of non-renewable energy sources and the lack of implementing energy saving measures.	-				
Air pollution	Ensuring air quality through the use of appropriate technical systems and procedures as well as the continuous monitoring of air pollutants in all Group activities.	+				
	Deterioration of air quality and harmful effects on health and the environment, due to increased emissions of air pollutants resulting from the Group's activities.	-				
Water pollution	Protection of water resources through the implementation of best available practices and environmental monitoring mechanisms/systems.	+				
	Pollution of water resources due to the lack of monitoring mechanisms of the Group's activities.	-				



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Material topic	Impacts	Impact Category	Impact Materiality	Financial Materiality	Double Materiality	Alignment with UN Sustainable Development Targets
Water Withdrawal -Consumption - Use	Reduction of water consumption through efficient water use systems and systematic consumption monitoring mechanisms (e.g. meters).	+				
	Increased water consumption and strain of water resources due to lack of mechanisms to monitor the efficiency or proper operation of equipment.	-				
Biodiversity and ecosystems	Protecting biodiversity and restoring ecosystems through planting, reforestation and monitoring programs in projects developed within or adjacent to protected areas.	+				
	Damage and/or loss of biodiversity due to the lack of taking mitigation measures in projects developed within or adjacent to protected areas.	-				
Resource inflows	Selecting construction materials and equipment with a low environmental footprint to conserve natural resources and contribute to the circular economy.	+				
	Depletion of natural resources, from the use of materials (e.g. concrete, inert materials, plastic, metal, chemicals) derived from non-renewable raw materials.	-				
Waste	Recovery of recyclable materials and reuse, with the aim of contributing to reducing waste production and conserving natural resources.	+				
	Increased disposal of waste in landfills due to lack of implementation of best practices in the area of waste management.	-				
Equal treatment and opportunities for all	Defending human rights, promoting diversity and ensuring equal opportunities for all, through the implementation of the Human Rights Policy, and a complaints mechanism.	+				
	Increased incidents of human rights violations, lack of initiatives to promote diversity, equality and inclusion, due to inefficient implementation of the Group's relevant policies and failure to cultivate an appropriate culture.	-				
Working conditions for the workforce in the value chain	A safe working environment for the workforce in the value chain, through a strong and effective health and safety management system in existing and new Group operations.	+				
	Increased likelihood of exposure to occupational hazards due to improper adherence to health and safety procedures and instructions by employees in the Group's value chain (e.g. contractors, suppliers).	-				



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Material topic	Impacts	Impact Category	Impact Materiality	Financial Materiality	Double Materiality	Alignment with UN Sustainable Development Targets
Working conditions for the workforce	Protection and promotion of physical and mental health through the strengthening of health and safety culture by implementing certified management systems and training programs.	+				
	Increase in the frequency and/or severity of accidents or incidents of occupational diseases due to failure of developing an appropriate health and safety culture.	-				
Economic, social and cultural rights	Creation of direct and indirect jobs in the Group's areas of operation, as well as the implementation of actions and initiatives in local communities.	+				
	Insufficient contribution to the economic and social development of the areas, within which the Group's activities are situated, due to reduced use of local staff.	-				
Access to green energy	Promoting access to green energy through reduced electricity costs for the residents of the municipalities where the Group's RES projects are located.	+				
	Decreased access to green energy, due to the lack of storage infrastructure for energy produced from renewable energy sources.	-				
Corporate culture	Absence of incidents of corruption through the implementation of a strong and ethical corporate governance model and a system for monitoring compliance with the company's Code of Conduct.	+				
	Incidents of corruption due to the absence of a strong and ethical corporate governance model and non-compliance with the Code of Conduct.	-				
Business continuity	Effective crisis management (emergencies affecting the Group's operation) through an integrated business continuity plan aimed at strengthening the Group's resilience.	+				
	Ineffective crisis management (emergencies affecting the Group's operation), due to the lack of mechanisms to identify risks related to business continuity.	-				
Value creation	Enhancing economic and social well-being for employees, shareholders and society in general, through the economic value generated by the Group.	+				
	Reduction in the economic value generated and distributed, from potential divestments, reduced turnover and/or delays in the implementation of the Group's investment plan.	-				



The results of the double materiality analysis are summarized below.



### Ranking of Sustainability Topics based on Double Materiality

Material Topics	
▲	Value creation
●	Climate change adaptation
■	Access to green energy
●	Biodiversity and ecosystems
●	Climate change mitigation
●	Resource inflows
●	Energy
●	Waste
▲	Business continuity
●	Air pollution
■	Working conditions for the workforce
■	Working conditions for the workforce in the value chain
■	Economic, social and cultural rights
▲	Corporate culture
●	Water Withdrawal – Consumption - Use
Other Topics	
■	Equal treatment and opportunities for all
●	Water pollution



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**GRI 2-1, 2-6 | ATHEX ESG A-G1**

TERNA ENERGY Group has a leading presence in the clean energy market, designing, implementing, and operating some of the most emblematic RES projects in the SE European region.

The main pillars of the Group's strategy are value creation, innovation and sustainability, representing values and priorities that have been defined since the Group's establishment.

Our success is a result of the vision and dedication of our people, who have a constant commitment to achieving the Group's objectives, always considering social and environmental responsibilities in order to contribute to the improvement of the quality of life in the areas where it operates.

Our strategic objective is to continue investing in RES, aiming for the expansion and diversification of our project portfolio and increasing installed capacity, leveraging the expertise, vertical structure, and capital adequacy of the Group. In this context, the Group is expected to continue its dynamic growth reaching an installed capacity of 6GW by the end of this decade.





# 4.1 Our Group at a Glance

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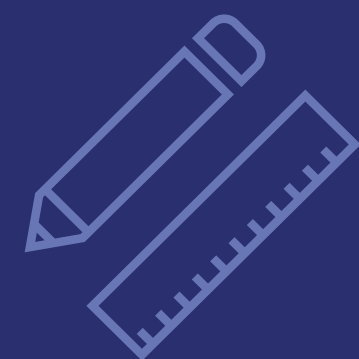
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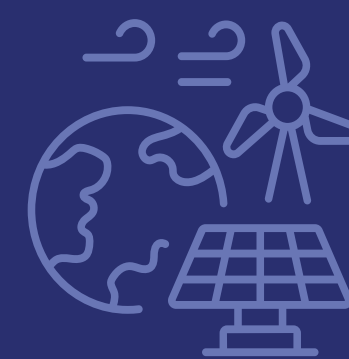
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**€ 328** mil.  
turnover



**3,842**  
training hours



**2,596** GWh  
energy generated from RES



**1.22** GW  
total installed RES capacity  
in Greece and abroad



**594**  
employees



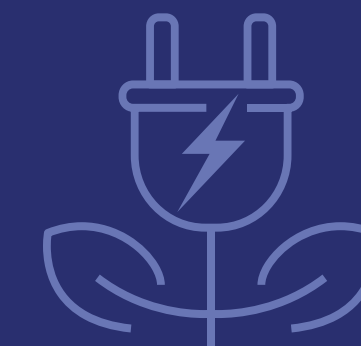
**€ 4.3** mil.  
for social support  
programs



**82.5%**  
domestic  
suppliers



Prevention of  
**1,079,844** t CO<sub>2</sub>e  
emissions



**100%**  
of electricity consumed  
from RES



GRI 2-6 | ATHEX ESG A-G1

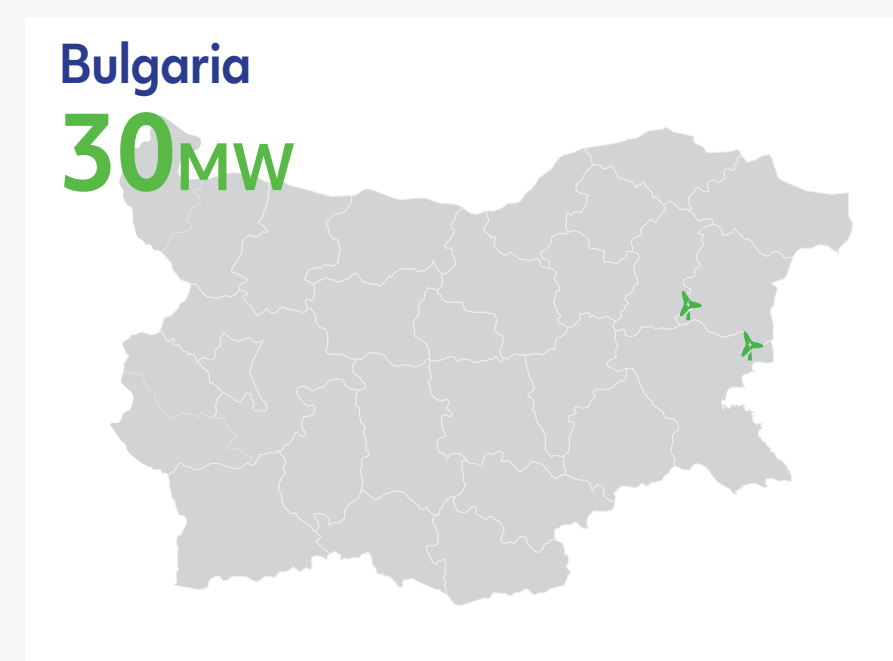
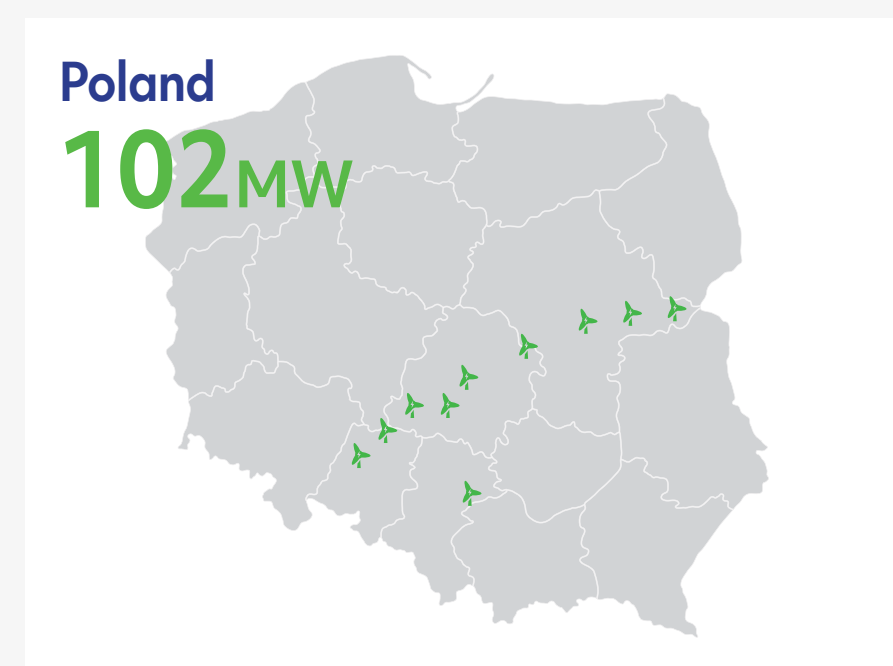
## 4.2 Activities, Value Chain and Business Relationships

The Group has the largest and most diversified project portfolio in Greece, with activities related to the development, construction, financing and operation of RES facilities, waste management and biogas production. Moreover, the Group is active in the field of design, installation, operation support, maintenance and technical management of an Integrated Automated Fare Collection System (E-Ticket) for urban transport. The shares of TERN A ENERGY are listed on the Athens Stock Exchange (FTSE / Athex Large Cap).

The total installed capacity of our facilities amounts to 1,224MW (Dec. 2023) in Greece, Poland and Bulgaria.

Up to 31.12.2023, installed capacity reached 2,500MW from our RES production facilities in operation, under construction, or ready for construction in Greece, Central and Eastern Europe. Including projects at various stages of maturity, the Group's portfolio exceeds 11GW.

### Installed capacity :





## Our Activities

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Energy



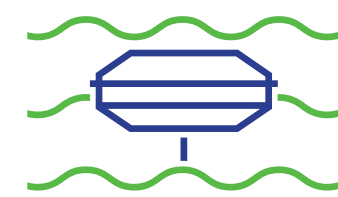
### Wind energy projects

The Group has been constructing and operating wind farms since 1997, with facilities today in Greece, Poland and Bulgaria. We also maintain a strategic partnership with Ocean Winds for the joint development of floating offshore wind farms in the Greek seas with a total capacity of 1.5GW. At the same time, the country's largest wind farm cluster in southern Evia with a total capacity of 330MW was recently commissioned.



### Hydroelectric energy projects

Hydroelectric energy contributes to increasing RES penetration in the Greek energy mix and the country's independence from imported fossil fuels. TERNA ENERGY is currently operating two hydroelectric projects with a total installed capacity of 17.8MW (Eleousa -6.6MW and Dafnozou-nara 11.2MW), while in the process of developing new projects.



### Pumped hydropower storage projects

Our Group is leading the promising and necessary energy storage sector through investing in the development of pumped hydropower storage projects. The pumped hydropower storage system in Amfilochia, currently under construction, is the largest investment (~€650 million) in energy storage in Greece, with an expected annual energy production of ~816GWh.



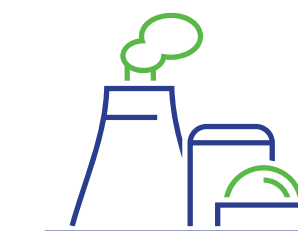
### Hybrid projects

In the field of hybrid RES projects, we are developing the largest hybrid project in Europe, the Hybrid Station in Amari, Crete, a model green investment of strategic importance combining wind energy with pumped hydropower storage and a total installed capacity of 153MW.



### Solar energy projects

In the field of solar energy, we develop and operate Photovoltaic (PV) Stations in various regions of Greece, while planning the development of new PV parks (terrestrial and offshore).



### Biogas and waste management

The Group is also active in the field of electricity production through biogas production and combustion, with a Biogas Production unit in Adendro, Thessaloniki of 1MW capacity.



### Public-Private Partnerships (PPP projects)

#### Automated Fare Collection (E-ticket)

Since 2021, the Group has a leading position in the market of Automated Fare Collection (E-ticket) Systems for urban transport, implementing and operating the E-Ticket System for Athens Urban Transport Organization (OASA SA). At the same time, we are developing a similar activity for the digital transformation of Thessaloniki Urban Transport Organization (OASTH) through our «Digital Transformation, Telematics, and Unified E-Ticket System for OASTH” project in accordance with best practices of other transportation operators in Europe.

Additionally, the Group is developing the interconnection of the OASA E-Ticket System with the central information management system of academic identity of the Ministry of Education and Religious Affairs, operated by the National Infrastructures for Research and Technology (GRNET SA).

#### Waste Management

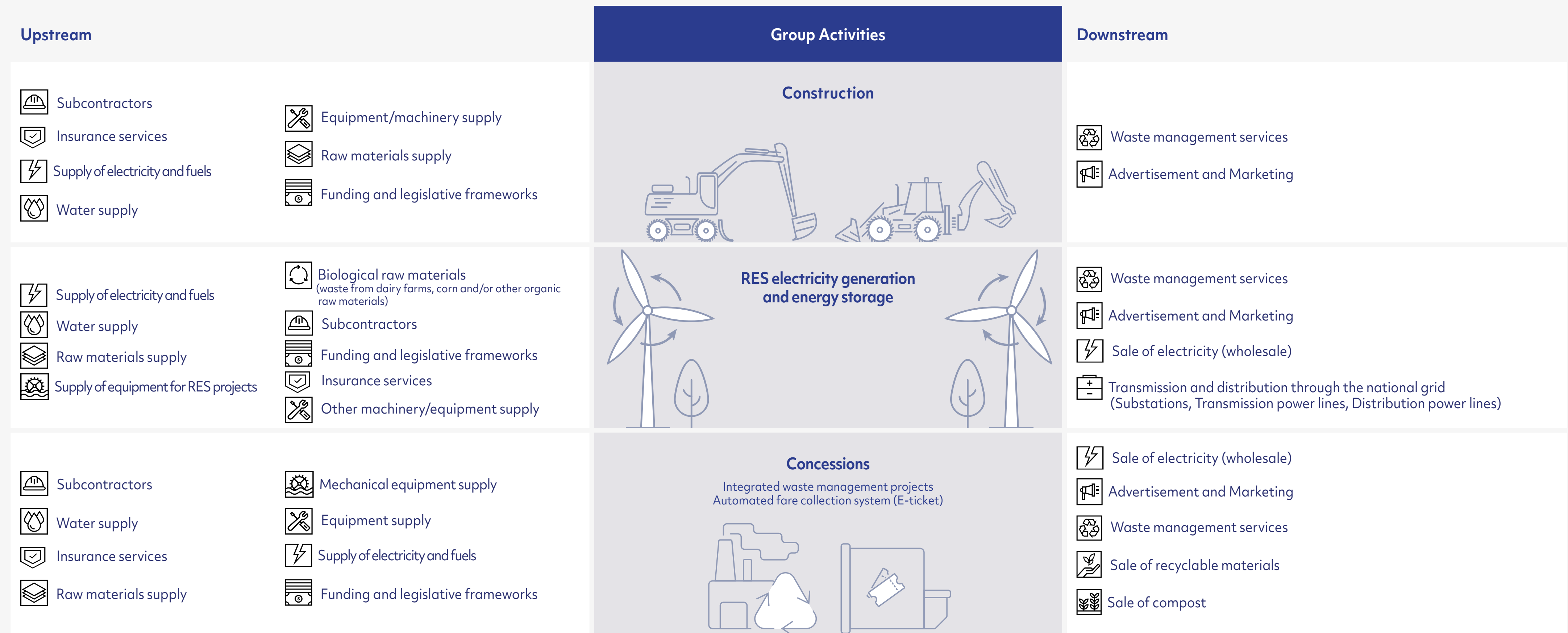
By undertaking PPP waste management projects in the regions of Epirus and Peloponnese we are continuously strengthening our role in the circular economy sector. The Waste Management Unit of Epirus has been in commercial operation since 2019 with a projected operational lifespan of 25 years. In the Peloponnese Region, during 2023 integrated waste management started at the Paleochouni Unit in Arcadia, as well as transitional management at the Kallirhoe Unit in Messinia and Skala in Laconia. Moreover, the Group also participates in new tenders to further strengthen its position in this important sector.



## Value Chain and Business Relationships

The Group identifies and assesses its impacts across its entire value chain in line with the new European Sustainability Reporting Standards (ESRS). Through a structured analysis and improvement process, including the use of evaluation criteria, life cycle analysis and active involvement of our stakeholders, we seek to promote sustainability and create long-term value for our stakeholders. Ongoing monitoring and reporting of results encourage continuous improvement, thereby enhancing the Group's efficiency and sustainability.

The structure of our value chain is presented below:

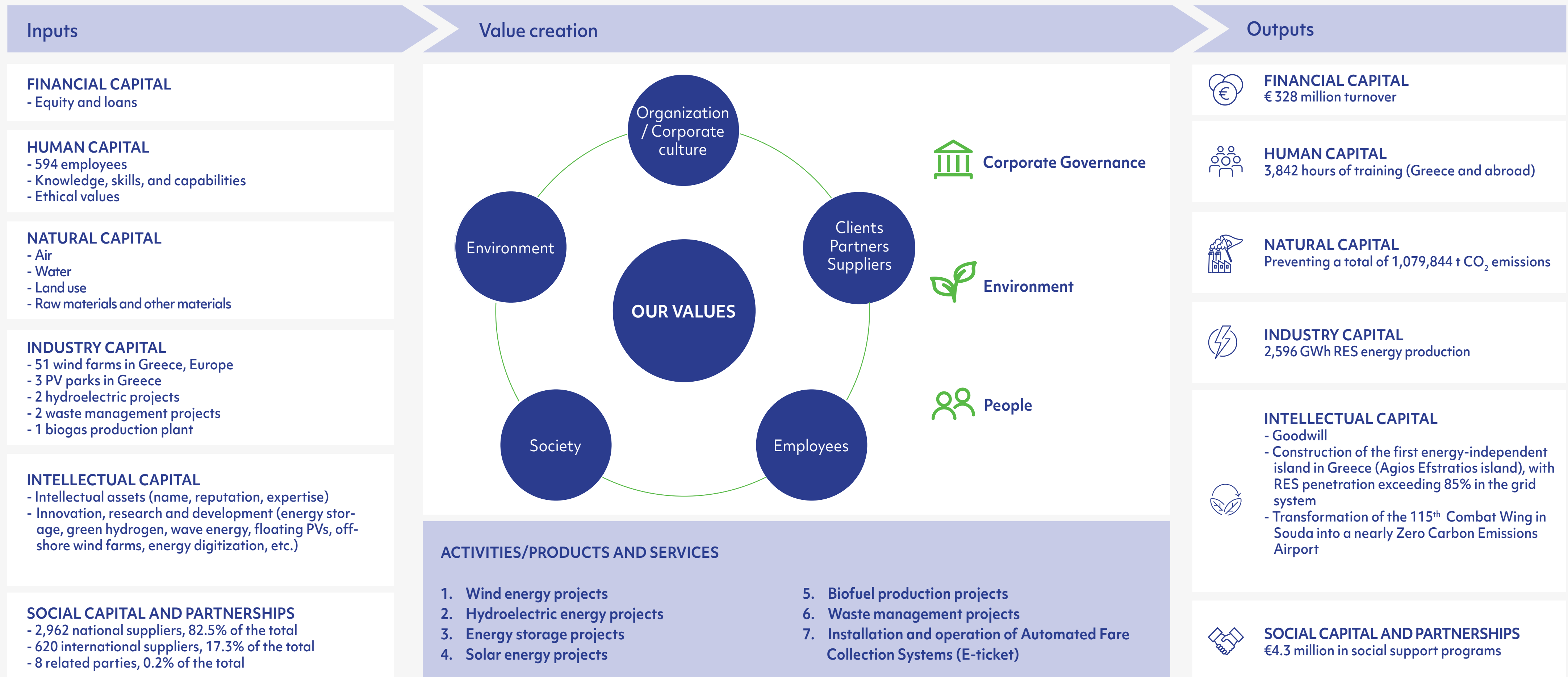




GRI 2-6 | ATHEX ESG A-G1

# 4.3 Business Model

The Group's business model represents the way it creates value and addresses the needs of its stakeholders. In practice, the Group invests in technological innovations that guarantee the highest quality of its services. This approach allows the Group to maintain its industry leadership, strengthen its business capabilities and effectively meet market demands.



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GRI 2-28

# 4.4 Memberships

TERNA ENERGY Group actively participates in national and international bodies, organizations and associations. Through developing a dialogue and exchange of knowledge and expertise with entities in the energy sector, the Group strengthens its partnership network and promotes business.



Specifically, the Group is a member of and cooperates with the following organizations and associations:

- Hellenic Federation of Enterprises (SEV)
- Greek Association of RES Electricity Producers (HELLAS RES)
- European Renewable Energies Federation (EREF)
- Hellenic Wind Energy Association (HWEA)
- WindEurope
- Association of Industries of Thessaly and Central Greece (AITCG)
- Institute of energy for South- East Europe (IENE)
- Observatoire Méditerranée de l'Energie (OME)
- International Hydropower Association (IHA)
- Eurelectric
- Greek Association of Environmental Protection Companies (PASEPPE)
- Global Wind Energy Council (GWEC)
- Hellenic Solid Waste Management Association (HSWMA)



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# 05 Environmental Care





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TERN A ENERGY Group operates with environmental responsibility, continuously adapting its business practices to the needs of environmental protection and efficient management of natural resources.

In this context, we implement actions for climate change mitigation and adaptation, responsible energy management and efficiency, minimization of pollutants, promotion of the circular economy, biodiversity conservation and rational management of water resources.



## Environmental and energy strategy

By ensuring compliance with environmental legislation and implementing sustainable practices, the Group aims to minimize its environmental footprint.

The environmental and energy strategy of the Group sets clear commitments, aiming for effective environmental management, optimal energy efficiency, and the protection and preservation of the natural environment.

-  Implementation of the Environmental Management System (EMS)
-  Implementation of the Eco-Management and Audit Scheme System (EMAS)
-  Mitigation of climate change impacts
-  Protection and conservation of biodiversity
-  Implementation of circular economy practices and responsible waste management
-  Responsible water management
-  Prevention of environmental pollution

In October 2023, TERN A ENERGY was registered in the **EU EMAS Register**.

GRI 3-3, 2-27

## Environmental and energy strategy

By applying the precautionary and prevention principles, we aim to identify and assess potential environmental risks related to our business operations by integrating identified environmental issues in our business model.

Actions and initiatives adopted by TERN A ENERGY Group through the environmental and energy management system we implement applicable to all our subsidiaries, include:

- Compliance with the requirements of ISO 14001:2015, ISO 9001:2015, and ISO 50001:2018 standards.
- Pollution prevention/avoidance.
- Compliance with applicable legislative requirements for the protection of the environment.
- Protecting natural resources through reuse and recycling of materials.
- Responsible energy use, identification and elimination of energy waste risks.
- Implementation of an Ecological Management and Audit System in accordance with EMAS Regulation 1221/2009 (as amended by Regulation 1505/2017).
- Continuous improvement of environmental performance and achievement of relevant targets.

During 2023, there were **no fines and/or financial sanctions** due to incidents of non-compliance with environmental laws and regulations.

## Environmental training of employees

A significant prerequisite to achieve the Group's objectives and effectively implement its environmental and energy strategy, is the regular, training and awareness raising of its employees on environmental and energy issues in the workplace and on the impacts of construction/operation of the Group's projects on the environment and society as a whole.

The Group's Quality, Environment, Health & Safety and Standards (QEHS) Department organizes and implements annual training sessions for employees on environmental and energy management issues.



GRI 3-3, 302-1, 302-3, 305-1, 305-2, 305-3, 305-5, 305-7 | ATHEX ESG A-E1, A-E2, A-E8, C-E1, C-E2, C-E3, SS-E1, SS-E2 | SASB IF-EU -110a.1, IF-EU-120a.1

# 5.1 Climate Change Mitigation and Adaptation

In line with the UN SDGs and EU targets for the transition to a climate-neutral economy by 2050, climate change mitigation and adaptation are a central pillar of the Group's business strategy.

Specifically, we are committed to reducing our carbon footprint by implementing the following actions:



Implementation of a strategy to reduce energy consumption and GHG emissions in our facilities.



Use of 100% green electricity in all our facilities, through Guarantees of Origin for 7,158.32MWh, achieving zero indirect GHG emissions (Scope 2 - Market based).



Continuous assessment of risks and opportunities related to climate change within the framework of our Environmental Management System and alignment with the recommendations of TCFD.



Contribution to the global effort for climate neutrality by increasing our installed capacity of renewable energy production to 6GW by 2029.



Acceleration of our investment plans in the field of energy storage, aiming to decisively contribute to maximizing the penetration of RES and achieving national and EU energy and climate targets.



Participation, for a second year, in the global sustainable development initiative CDP\* platform in the categories of Climate Change and Water Security, disclosing extensive quantitative and qualitative data regarding the management of environmental issues and addressing climate change impacts within the scope of our activities. It should be noted that we achieved a B rating (on a scale of D-/A), confirming and recognizing our performance in climate change mitigation for yet another year.





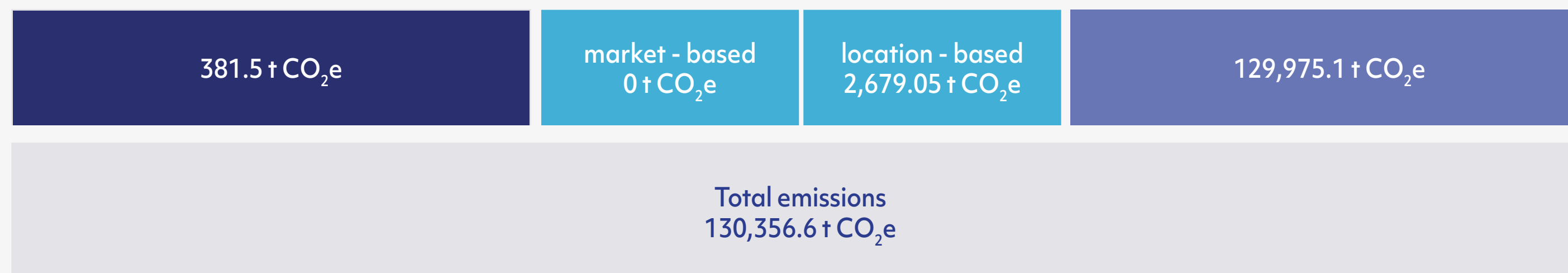
## GHG Emissions

Guided by its strategic priority to implement best practices available for the reduction of GHG emissions arising from its business activities, the Group records its direct and indirect CO<sub>2</sub>e emissions.

The carbon footprint calculation includes Scope 1 direct emissions generated from facilities under the Group's operational control, indirect Scope 2 emissions from electricity consumption, as defined by ISO 14064-1:2018 and GHG Protocol Corporate Standards and indirect Scope 3 emissions generated from the Group's value chain. Following the completion of the calculation process, the Group proceeded to voluntary external verification of its emissions by an independent third party in accordance with ISO 14064-3.

Direct CO <sub>2</sub> emissions (Scope 1) <sup>1</sup>	Indirect CO <sub>2</sub> emissions (Scope 2) <sup>2</sup>	Indirect CO <sub>2</sub> emissions (Scope 3) <sup>3</sup>
Direct CO <sub>2</sub> emissions resulting from sources (facilities or processes that release GHG into the atmosphere) owned or controlled by the Group.	Indirect CO <sub>2</sub> emissions resulting from the production of electricity purchased by the Group for its own use. Overall, the Group's Scope 2 GHG emissions were zero in 2023, due to the utilization of 100% RES in the energy mix of the Greek market.	Indirect GHG emissions resulting from activities in the Group's value chain (Scope 3) and not directly from Group's activities.

Image 1: Total direct and indirect GHG emissions in 2023 (t CO<sub>2</sub>e)

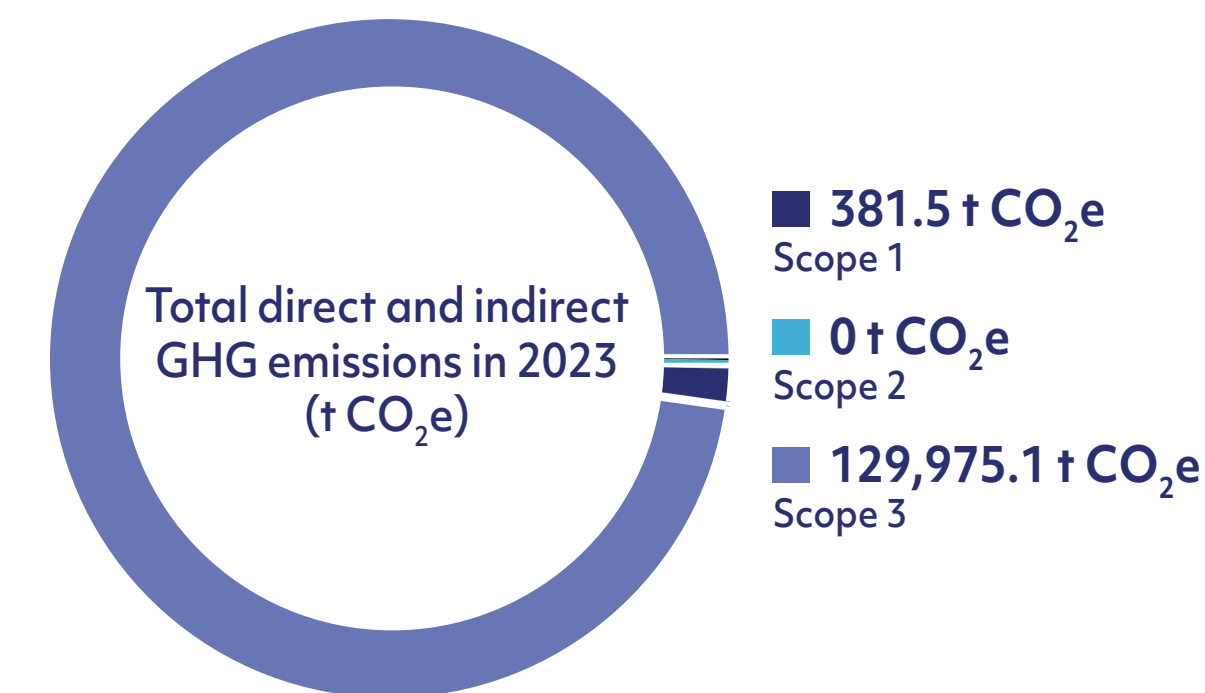


<sup>1</sup>KPI according to the "European Commission Guidelines on reporting climate-related information". The calculation of Scope 1 emissions is carried out through the conversion of Fuel Consumption (in TJ), to carbon dioxide equivalents (CO<sub>2</sub>eq), with the use of conversion factors. The figures at the end of the reference period (year 2023) are used for the calculation.

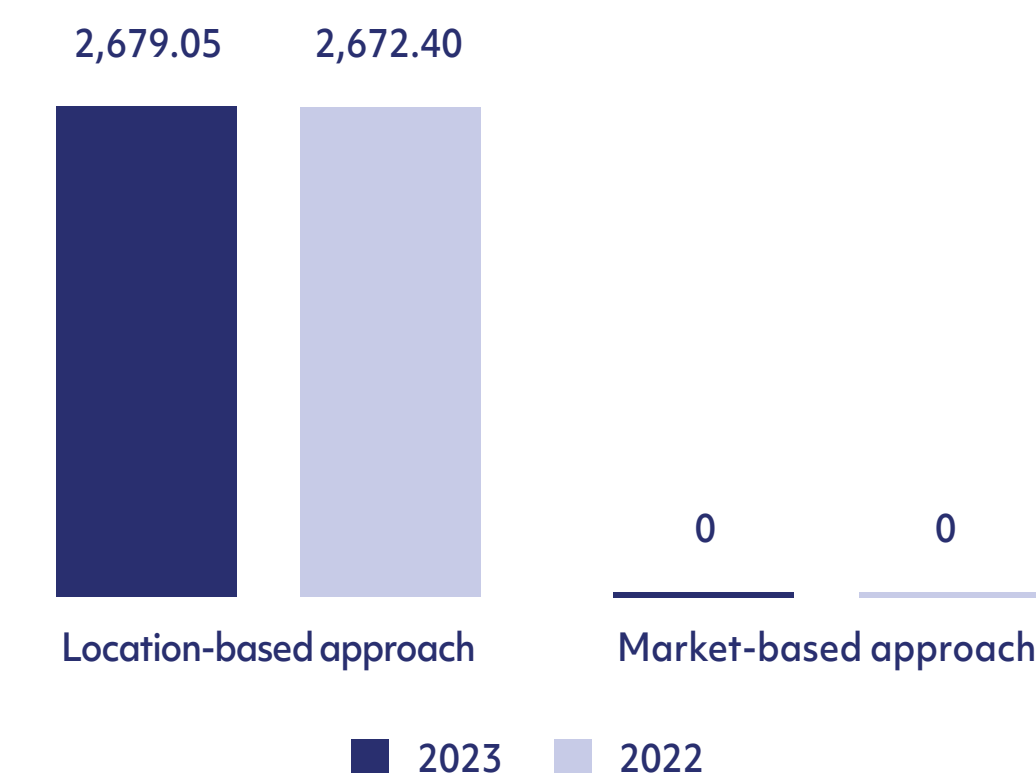
<sup>2</sup>KPI according to the "European Commission Guidelines on reporting climate-related information". The calculation of Scope 2 emissions is carried out through the conversion of electricity, heating, cooling and steam consumption (in TJ), to carbon dioxide equivalents (CO<sub>2</sub>eq), with the use of conversion factors. The figures at the end of the reference period (year 2023) are used for the calculation.

<sup>3</sup>The calculation of Scope 3 emissions is based on GHG Protocol – Corporate Standard methodology.

The Group's total direct (Scope 1) and indirect (Scope 2, 3) GHG emissions (t CO<sub>2</sub>e) are summarized in the graph below.



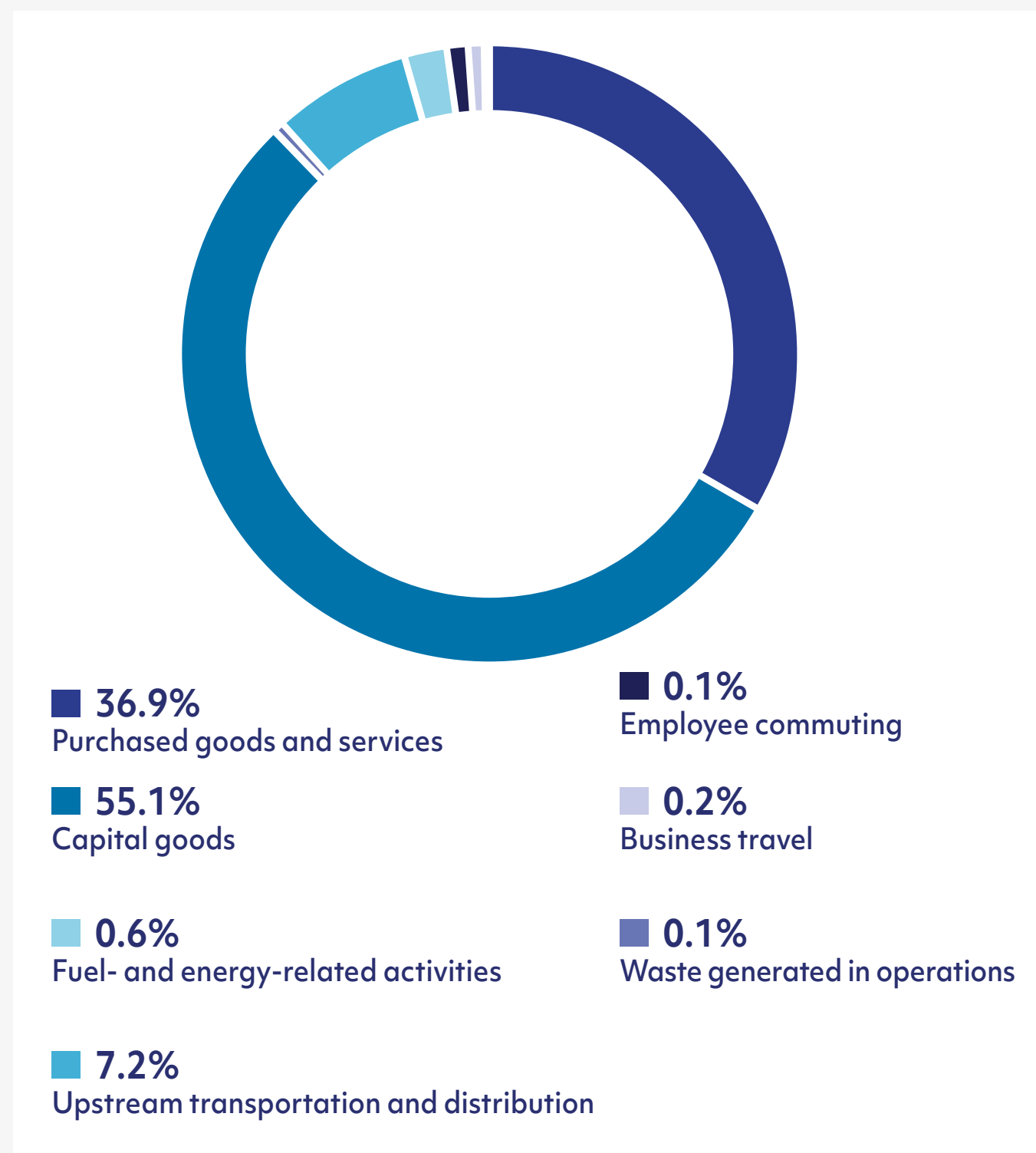
The following graph presents Scope 2 GHG emissions based on the two different approaches applied (location-based and market-based emissions) for reporting year 2022 and 2023, according to the GHG Protocol – Corporate Standard.





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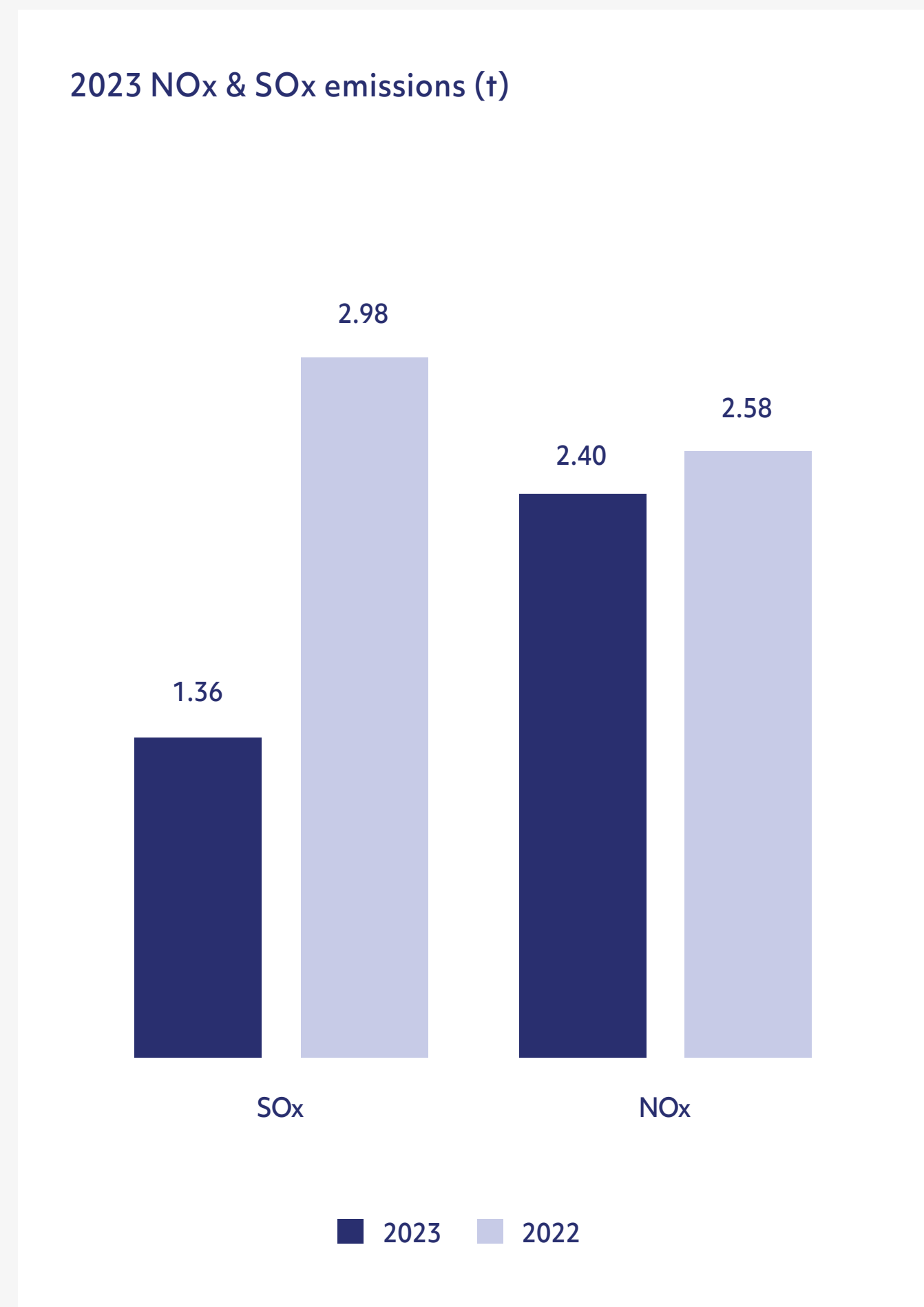
The break-down of Scope 3 GHG emissions across specific categories is presented in the following graph, with the largest percentage attributed to categories 1 and 2. These categories refer to the Group's consumption of goods and services used for its operations, according to the GHG Protocol-Corporate Standard (Cat. 1: Purchased goods and services, Cat. 2: Capital goods).



It should be noted that through the production of clean energy, which constitutes our Group's core domain of activity, we contribute to the prevention of significant amounts of CO<sub>2</sub> emissions. Specifically, for 2023 the Group's RES projects produced 2,596GWh of green energy, preventing the release of a total of 1,079,844 t CO<sub>2</sub>e in the atmosphere.

### Air pollutant emissions

The Group calculates the emissions of nitrogen oxides (NOx) and sulfur oxides (SOx) from its activities. The results for 2023 are presented below. In 2023, there was a reduction of 7% of NOx emissions and 54.4% of SOx emissions.



### Responsible energy management

Responsible energy management is an integral part of our business operations. Energy consumption is systematically monitored and recorded across our facilities, in order to identify reduction actions and initiatives. With the aim of improving our energy efficiency and saving, we invest in the renewal and proper maintenance of our machinery/equipment and the improvement of the lighting systems of our facilities.

	2023	2022
Total energy consumption within the Group (MWh)	30,483	29,158
Fuel consumption within the Group from RES (MWh)	21,710	21,243
Electricity consumption within the Group (MWh)	7,158	6,372
Electricity consumption within the Group, from RES (MWh)	7,158	6,372
Percentage of energy consumed from RES within the Group (%)	95	95





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## Innovation, research and development (R&D) initiatives that contribute to decarbonization and the reduction of energy consumption

In the recent years, TERN A ENERGY invests in several R&D activities and initiatives, the most important of which include:

- Construction of the innovative large-scale project on the island of Agios Efstratios, transforming it into the first energy autonomous island in Greece. The project comprises of wind and solar energy facilities, a battery storage system and a remote heating network, achieving energy independence of the island with RES penetration exceeding 85%.
- Conduction of several studies on the production, distribution and use of green hydrogen in Greece, through cooperations with research institutions and universities and submission of several research proposals on new technologies, such as offshore floating PVs, wave energy and green hydrogen.
- Participation in an EU research program to further strengthen cooperation and coordination between Transmission System Operators of SE Europe (SEE) in order to support the integration of electricity markets in the region, whilst promoting higher penetration of clean energy.
- Becoming a member of the Energy Web, an organization promoting the energy blockchain to accelerate the energy transition by developing open-source Web3 technologies that assist companies in developing business models around clean and location spread energy resources.

The **Group consistently invests** in R&D across a wide range of innovative technologies, covering a spectrum of fields including energy storage, green hydrogen, wave energy, floating PVs, offshore wind farms, energy digitization and more.





GRI 3-3, 304-2 | ATHEX ESG A-E5

## 5.2 Protection of Biodiversity

The protection of biodiversity and natural landscapes is a significant challenge for the Group striving to reduce its impact on local ecosystems while contributing to sustainable development. For this purpose, we undertake initiatives and implement actions for the protection of biodiversity in accordance with national environmental legislation and best practices.

The Group implements strategies focused on preserving ecosystem balance and developing ecologically sustainable practices. Through systematic initiatives and management measures, we aim to enhance our positive environmental impact and mitigate the negative effects of our activities. Indicatively in 2023, we carried out the following actions:



Conducted a study on wildlife protection during the construction of waste management facilities in the Peloponnese Region (Waste Management Unit in Skala, Lakonia).



Completed the first year of our Avifauna Monitoring Program at the operational Small Hydroelectric Power Station of Dafnozouara – Sanidi in Arta, Karditsa, and Aetolia-Acarnania Regions (December 2022 – November 2023). Monthly program activities included:

1. Recording flights of sensitive bird species around overhead high-voltage power lines and assessing collision risks.
2. Surveying potential bird collisions under overhead high-voltage power lines.
3. Recording important bird species in the project area and mapping nests of sensitive species.
4. Processing and analyzing data collected from the above field surveys in order to generate thematic maps, and draw conclusions regarding flights of sensitive species, collision risks, and the necessity for mitigation measures when risks are deemed significant.



In the construction site of Amphilochia's pumped hydropower storage project, inspections were conducted during vegetation clearing and surface soil excavations, as part of the environmental monitoring program implemented in compliance with project's environmental permitting requirements. Additionally, an area within a 100m radius from the interventions was surveyed in order to identify wildlife species (mammals, birds, reptiles, amphibians, fish) potentially at risk from our activities, ensuring their relocation to safer areas when necessary. A biologist specialized in avifauna also conducts monthly field surveys and prepares relevant reports.





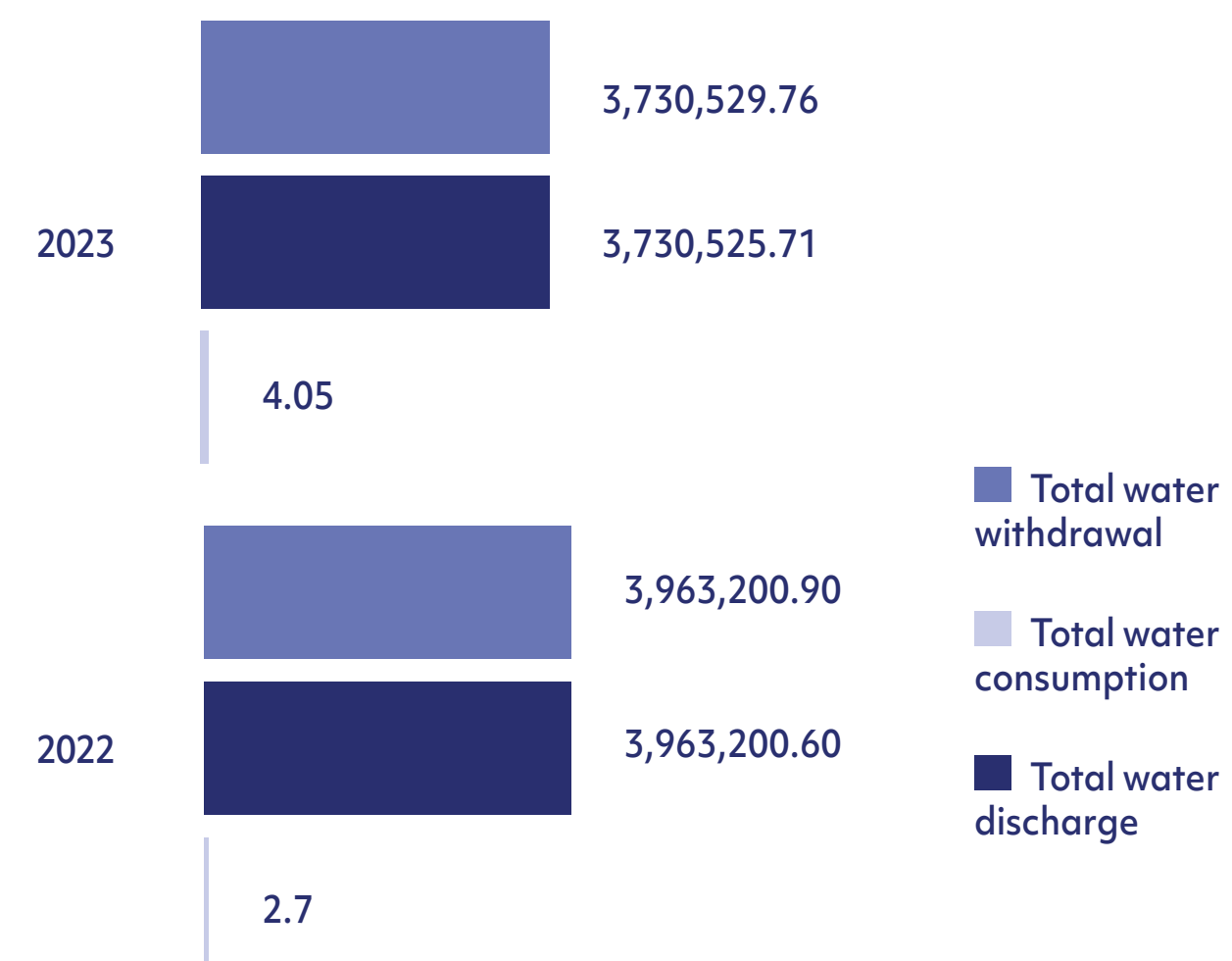
GRI 3-3, 303-3, 303-4, 303-5 | ATHEX ESG SS-E3, SS-E4 | SASB IF-EU-140a.1

# 5.3 Water Management

Rational and responsible water resources management is highlighted as a material topic for the Group’s environmental strategy, affirming its high sense of responsibility towards both nature and human rights of local communities. Moreover, water consumption strictly aligns with the requirements of issued environmental permits of the Group’s activities.

It is worth noting that in 2023, TERNA ENERGY Group was assessed for the first time by the CDP in the Water Security category, regarding the way it manages water resources in the context of its activities. The Group secured a score of B (on a D-/A scale) placing the Group in the top performers of the 2<sup>nd</sup> «Management level» category of the index.

Water Management (ML)





GRI 3-3, 306-1, 306-2, 306-3, 306-4, 306-5 | ATHEX ESG A-E3, A-E4

# 5.4 Waste Management and Circular Economy

Responsible waste management applies to all Group activities, its suppliers and partners, both in Greece and abroad. Ineffective waste management may have negative effects on communities at a local level (e.g., pollution and degradation of residents' quality of life), national level (environmental degradation and exacerbation of existing waste management problems), and at Group level (e.g. imposition of sanctions and shutdown of operations due to uncontrolled waste production and/or disposal methods).

Therefore, the Group invests in implementing principles of circular economy, applying reuse and recycling practices in collaboration with certified entities to meet its raw material demands. At the same time, the relevant standards of the Group's certified EMS are explicitly applied and internal and external inspections are conducted to identify impacts that require improvement and adopt appropriate preventive and corrective measures to address them.

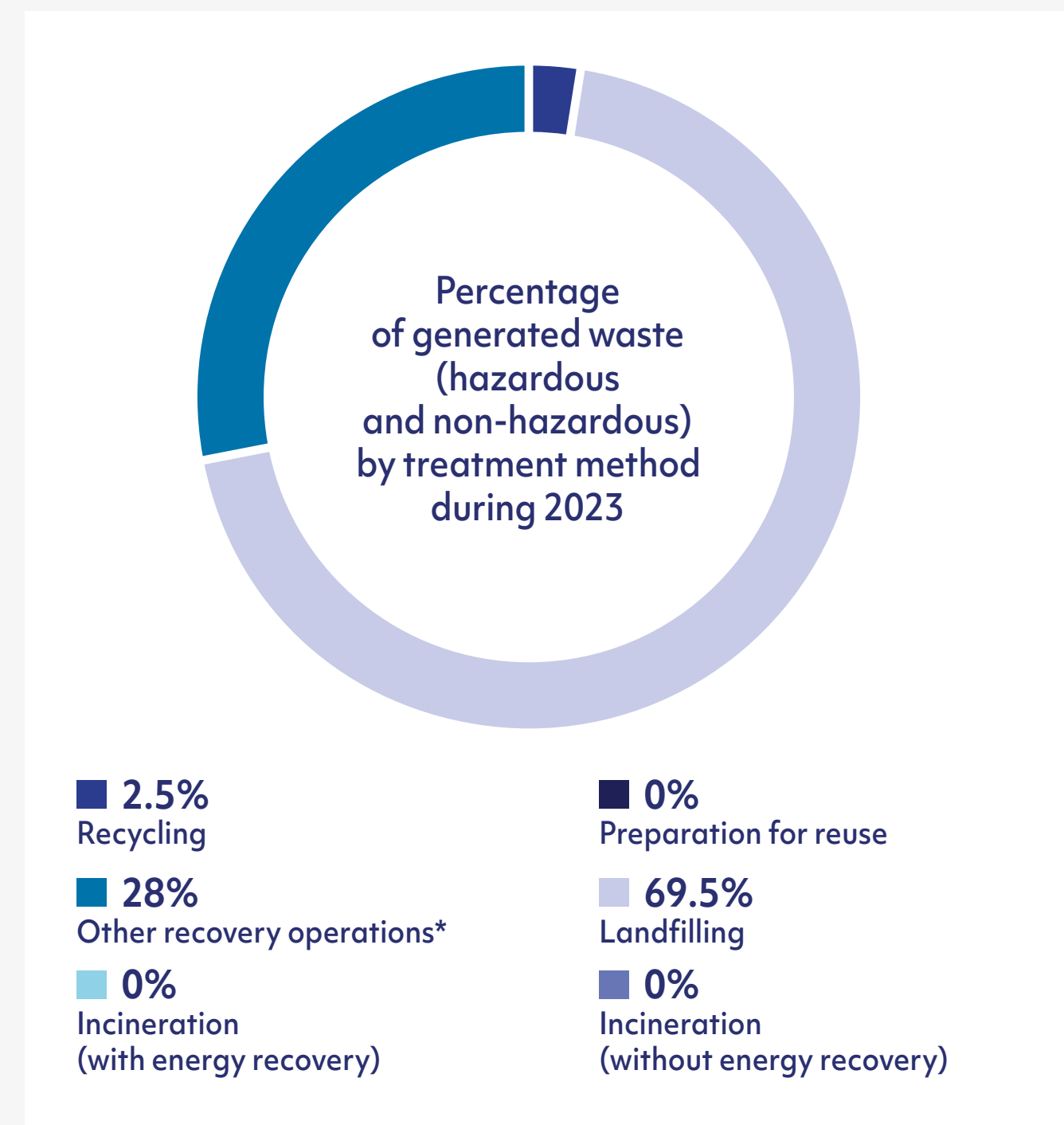
In 2023, a total of 237.6t of waste was generated, 69.5% of which were non-hazardous.

Regarding hazardous waste, the Group conducts regular inspections to ensure proper monitoring and management. Additionally, it plans and take all necessary measures to eliminate the risk of potential pollution, such as the use of certified UN-type barrels for safe transportation of hazardous waste and for the collection and storage of lubricating oils.

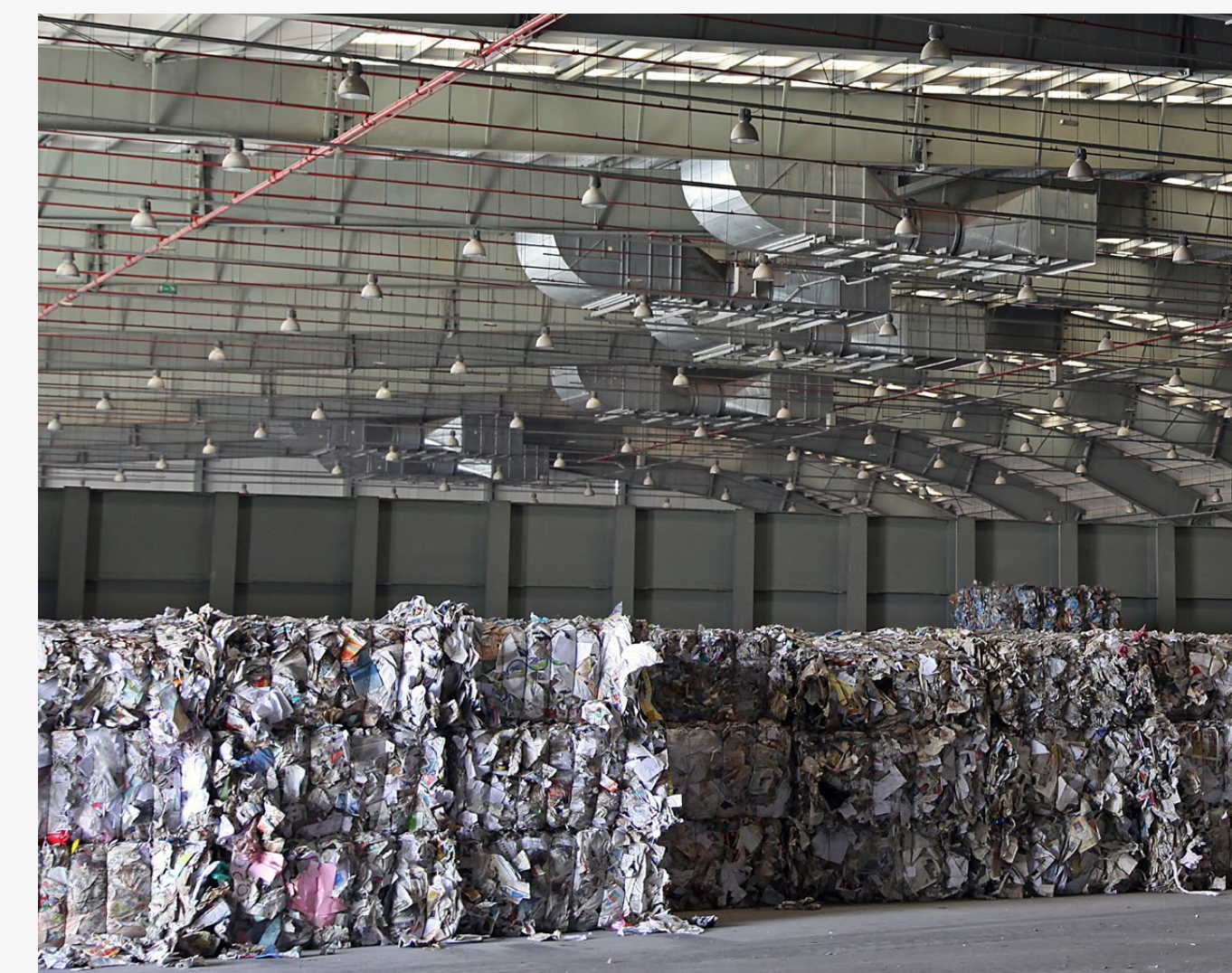
Across the Group's facilities, paper, aluminum, glass, plastic, electronic and electrical equipment, lamps and batteries are sorted and recycled using special collection containers. Waste disposal and management is carried out through our cooperation with alternative management system operators certified by the Hellenic Recycling Agency (HRA/EOAN), as well as with companies licensed for the collection, transportation, disposal/use of waste in Greece and abroad.

Effluents generated by the Group's activities are thoroughly monitored and their management is conducted in line with applicable environmental regulations and the environmental permits issued for each project. Liquid waste generated includes:

- Sewage waste
- Effluents generated from the production process
- Waste oils



\*Refers to hazardous waste which following its collection by licensed third parties, undergoes special treatment or/and recovery operations apart from recycling procedures that apply to non-hazardous waste.



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ATHEX ESG A-S1

# 5.5 EU Taxonomy

## EU Taxonomy Regulation 2020/852

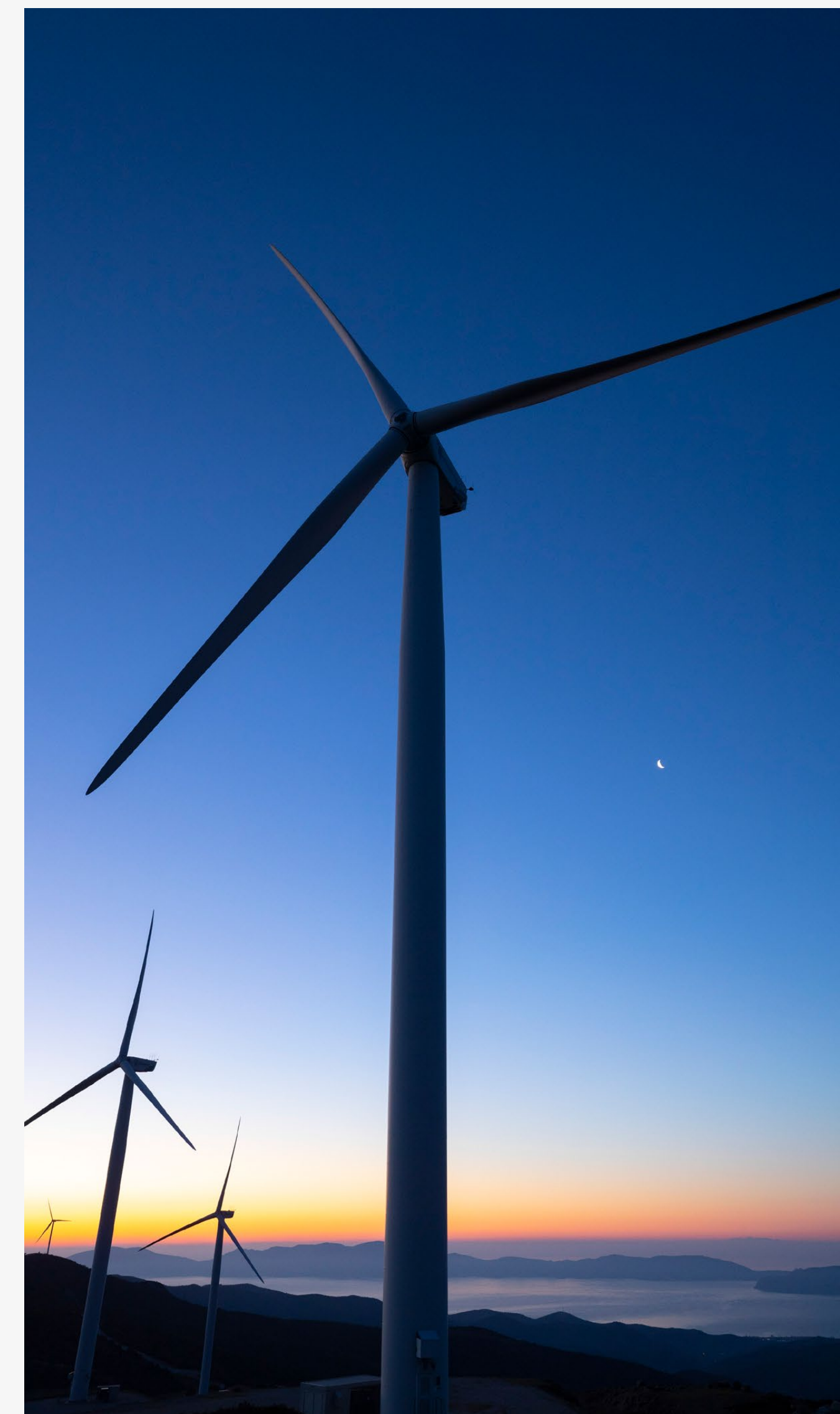
The EU Taxonomy Regulation 2020/852 is a key component of the European Commission's action plan to redirect capital flows towards a more sustainable and inclusive economy. It represents an important step towards achieving carbon neutrality by 2050 in line with EU climate goals as the Taxonomy is a classification system for environmentally sustainable economic activities. The Regulation sets out the criteria for determining the extent to which an investment can be classified as environmentally sustainable.

According to Article 8 (1) of the Regulation, companies required to publish non-financial information (under Directive 2013/34/EU) shall disclose additional information on how and to what extent their activities are associated with environmentally sustainable economic activities, as defined by the Regulation.

More specifically, in accordance with the Delegated Regulation 2021/2178 EU in force (Article 10, par. 2) on the disclosures scheduled for 2024 and applicable to the financial year 2023, non-financial undertakings are now mandated to disclose the percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) related to economic activities that are aligned with the Taxonomy and contribute significantly to one or more Environmental Objectives of the Regulation:

- climate change mitigation
- climate change adaptation
- sustainable use and protection of water and marine resources
- transition to a circular economy
- pollution prevention and control
- protection and restoration of biodiversity and ecosystems






The following procedure was implemented in order to assess the alignment of the Group's financial activities with the Taxonomy Regulation:



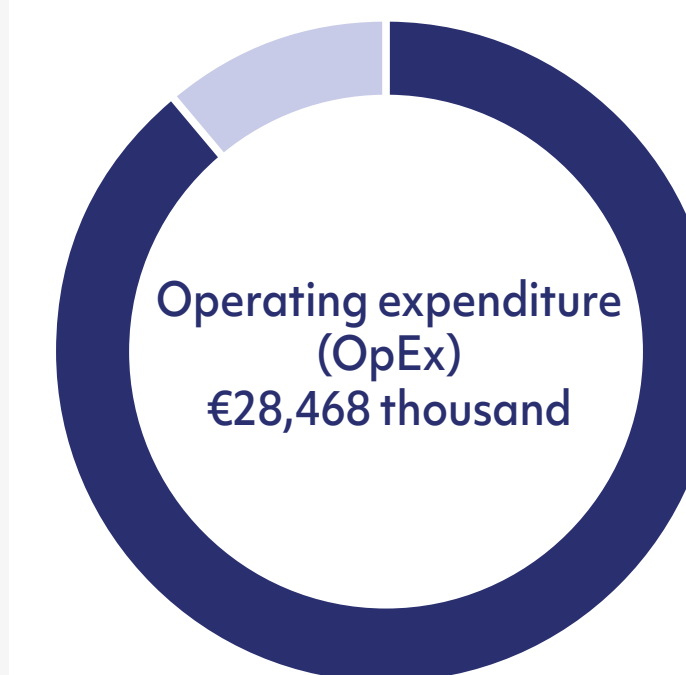
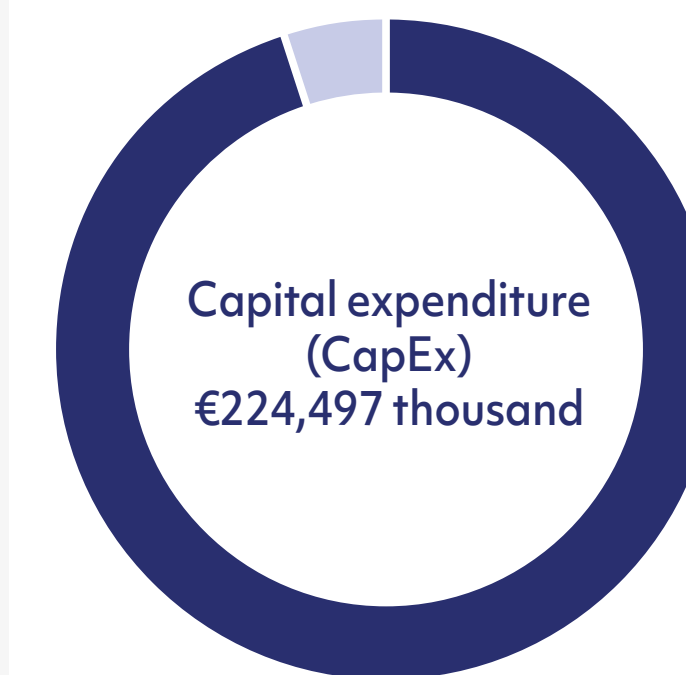


## Eligible and aligned economic activities

The Taxonomy eligible and aligned economic activities of the Group for fiscal year 2023 significantly contribute to climate change mitigation, as presented in the following table.

Economic Activity	NACE Code	Number of projects of eligible activity and total capacity	Environmental Objective where there is Significant Contribution
 4.1 Electricity generation using solar photovoltaic technology	35.11 42.22	3 projects ~8.5MW	Climate Change Mitigation
 4.3 Electricity generation from wind power	35.11 42.22	51 projects ~1.2GW	Climate Change Mitigation
 4.5 Electricity generation from hydropower	35.11 42.22	2 projects ~17.8MW	Climate Change Mitigation
 4.8 Electricity generation from bioenergy	35.11 42.22	1 project 1MW	Climate Change Mitigation
 4.10 Storage of electricity	-	1 project 680MW (production) and 730MW (Pumping)	Climate Change Mitigation

TERNA ENERGY Group's taxonomy aligned economic activities as a percentage of turnover amounts to **76%**.



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# 06 Responsible Business Operation





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TERNA ENERGY Group recognizes that employees are the foundation of its business success. Providing a workplace that supports and safeguards the health and safety of its employees, respects human rights and provides equal opportunities while aiming in training and developing its human resources is a key priority for the Group.





GRI 2-7, 2-8, 2-30, 3-3, 401-1, 401-2, 405-1 | ATHEX ESG C-S2, C-S3, C-S4, C-S7

# 6.1 Employment practices

Placing human resources at its core, the Group aims to create a modern workplace environment that respects human rights, transparency, fairness, equal opportunities, occupational safety and creates new employment opportunities.

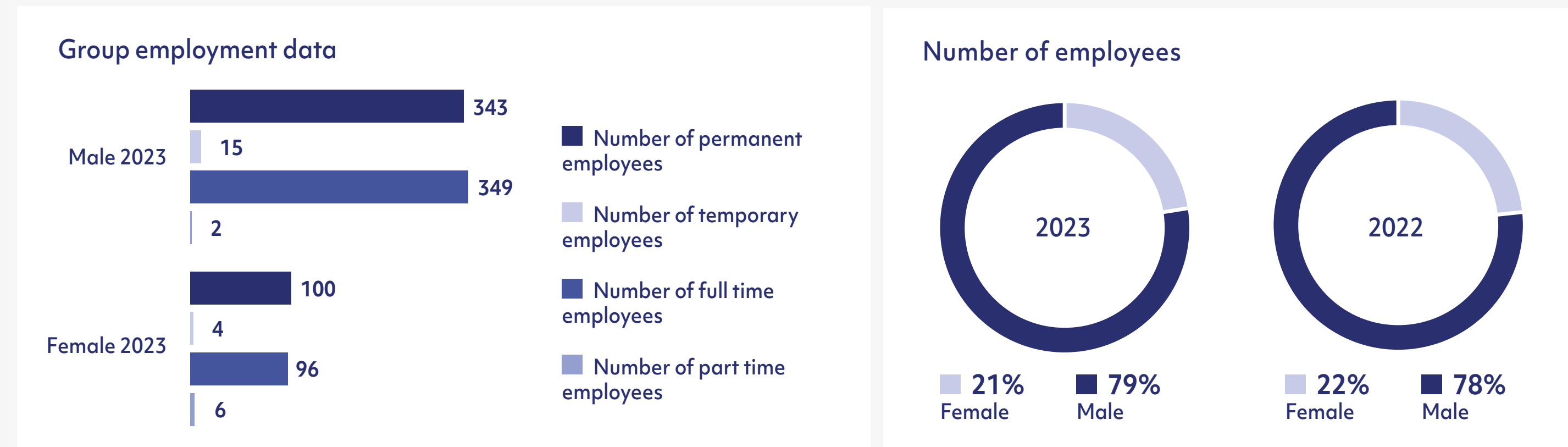
The contracts of all Group employees comply with the legal framework in force. All employees in Greece are covered by the National General Collective Bargaining Agreement and accordingly in the countries where the Group operates abroad, the provisions for collective agreements at national level are followed.



## Employment in the Group

Through its activities in Greece and abroad, the Group offers various career opportunities. Attracting foreign investments contributes to further developing the volume and nature of its activities, expanding into new geographic locations, enhancing employment and economic growth of local communities.

The Group's Recruitment Policy is based on objective criteria, such as education, experience, competencies and skills of employees. At the same time, it ensures that recruitment procedures are not based on any form of discrimination related to gender, nationality, language, religion, political beliefs, disabilities, sexual orientation, or other elements of diversity.



## Enhancing youth employment

The Group substantially contributes to the efforts of connecting young people with the labor market. In cooperation with the largest University Institutions of the country (occasionally with the National Technical University of Athens, the National and Kapodistrian University of Athens, the Athens University of Economics and Business, the University of Piraeus, the Aristotle University of Thessaloniki, the University of Macedonia, etc.), strengthens the institution of Internships and the acquisition of professional experience, aiming at both the smooth transition of young people to the labor market and their absorption within the Group.

In 2023, 12 students completed their internship at the Group.



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## Equal opportunities, remuneration and benefits

The Group places emphasis on creating and ensuring a working environment that offers equal treatment and career opportunities, zero tolerance of all forms of discrimination and utmost respect for the rights of its employees.

Meanwhile, vacancies are filled through internal procedures when the Group's employees/executives are interested in transitioning to positions where they believe they can perform better or when they wish to be promoted to positions hierarchically superior to their current position in the Group.

### The key principles included in the Group's Remuneration & Benefits Policy are:

- Creation of a working environment that promotes commitment and motivates employees.
- Attracting new competent executives and employees of all levels.
- Efficient performance within a stable and controlled working environment with trained human resources and a common corporate culture and awareness, is a constant investment for our Group.

All actions related to the Group's employees are based on meritocratic criteria based on the performance, abilities, achievement, effectiveness, and qualifications. At the same time, the attraction of new talent and the retention of existing talent, are based on transparent and objective procedures that underpin our business strategy.

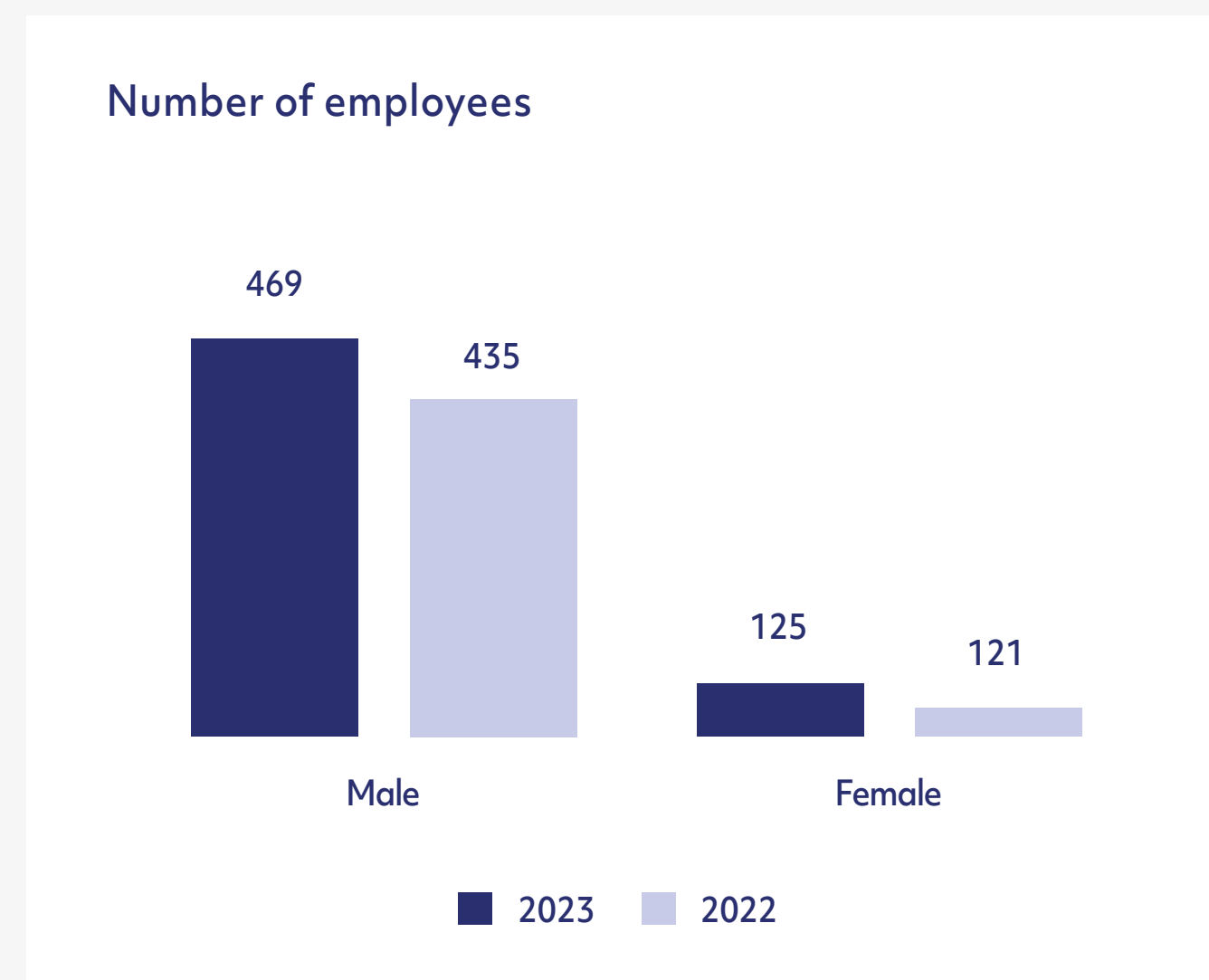
The Remuneration Committee has the responsibility for the Remuneration Policy applicable to Board Members, Committee Members, General Managers (or their deputies) as well as the senior management of the Group, as prescribed in Article 110 (1) of L. 4548/2018. Human Resources Management is responsible for the proper implementation of the Compensation and Benefits framework for the rest of the Group's population.

## Enhancing diversity

### Promoting equality, inclusion and diversity

The Group is committed to promoting and maintaining a workplace environment that supports and respects diversity among employees. Our goal is the equal representation of all genders at all levels of employment, while ensuring their equal treatment, regardless of age, sex, religion, nationality, political beliefs or sexual orientation.

In 2023, the Group had zero incidents of discrimination. The representation of female employees reached 21%, while the proportion of women in managerial positions amounts to 30%.



### Enhancing accessibility

Furthermore, in the context of promoting equal access and use of our workplace by all citizens without exclusions, the Group has been audited and complies with the requirements and recommendations outlined in the ELOT 1439:2013 Standard «Organization Friendly to People with Disabilities - Requirements and Recommendations».





GRI 3-3, 403-1, 403-2, 403-3, 403-4, 403-5, 403-7, 403-8, 403-9 | ATHEX ESG C-S5, SS-S6 | SASB IF-EN-320a.1

## 6.2 Occupational Health and Safety

Health, safety and the well-being of our human resources is a key part of our broader business policy and philosophy. Our Group implements a series of actions that ensure a healthy and safe working environment.

### Health and Safety Management System

The Group implements an occupational Health & Safety Management System, that complies with all legal and other national, EU and international requirements, guidelines and regulations in the field of Health & Safety.

- The System applies to all employees (including subcontractors) across the Group's projects and activities. In this context, a Management Systems Policy has been adopted, in which the Health and Safety Policy is integrated (H&S).
- 98% of the Group's employees and staff who are not employees but whose work and/or workplace is controlled by the Group, is covered by an externally audited health and safety system<sup>1</sup>.
- The System is certified based on international standard ISO 45001:2018. Senior Management actively participates, supports and prioritizes the implementation of the system across the Group's projects in Greece and abroad. Moreover, it collaborates and consults with employees to implement the goals the system sets out to achieve, providing all the necessary resources for continuous improvement.

The Group is committed to the continuous improvement of the H&S Management System through conducting scheduled and random audits, as well as through the implementation of internal inspections.

In 2023, 60 internal and external audits were conducted across the Group's facilities. Furthermore, follow-up audits and/or meetings are carried out through which the extent of implementation of corrective actions, as investigated during the audits, is assessed.

### Risk minimization and incident investigation

Acknowledging the importance of timely prevention and minimization of risks, the Group ensures the H&S of its human resources and identifies potential risks of occupational accidents through special Occupational Risk Assessment Studies (ORAs) in order to minimize these risks. Through ORAs, risks related to H&S are identified for each job position.

At the same time, with respect towards local communities where we operate, before commencing any project, impact studies are conducted to assess potential social and environmental risks (e.g. impacts on H&S of residents, quality of life) our activities pose to local communities.

For the proper execution of the Group's activities, there is close collaboration between our Safety Coordinators/Officers and executives of each project, while Management plans and implements measures to address any identified risks for the minimization of negative impacts.

Furthermore, in addition to internal and external inspections and the annual review of the H&S Management System in the context of its continuous improvement, employees and any other interested party participate

and have the opportunity to report any issue related to occupational H&S to the Group's Quality, Health & Safety, Environment and Standards Division, either by name or anonymously, through the following communication channels:



Sending an e-mail after completing a relevant form which is part of the Integrated Management System and sending it to: [departmentqshe@terna-energy.com](mailto:departmentqshe@terna-energy.com)



Using the Group's website [www.ternaenergy.integrityline.com/frontpage](http://www.ternaenergy.integrityline.com/frontpage) [www.terna-energy.com/epikinonia/](http://www.terna-energy.com/epikinonia/)



Sending a letter addressed to TERNA ENERGY S.A. 85, Mesogeion Ave, Athens 115 26, Greece, to the attention of the Company's «Quality, Health & Safety, Environment and Standards Department», and marked as «Confidential».

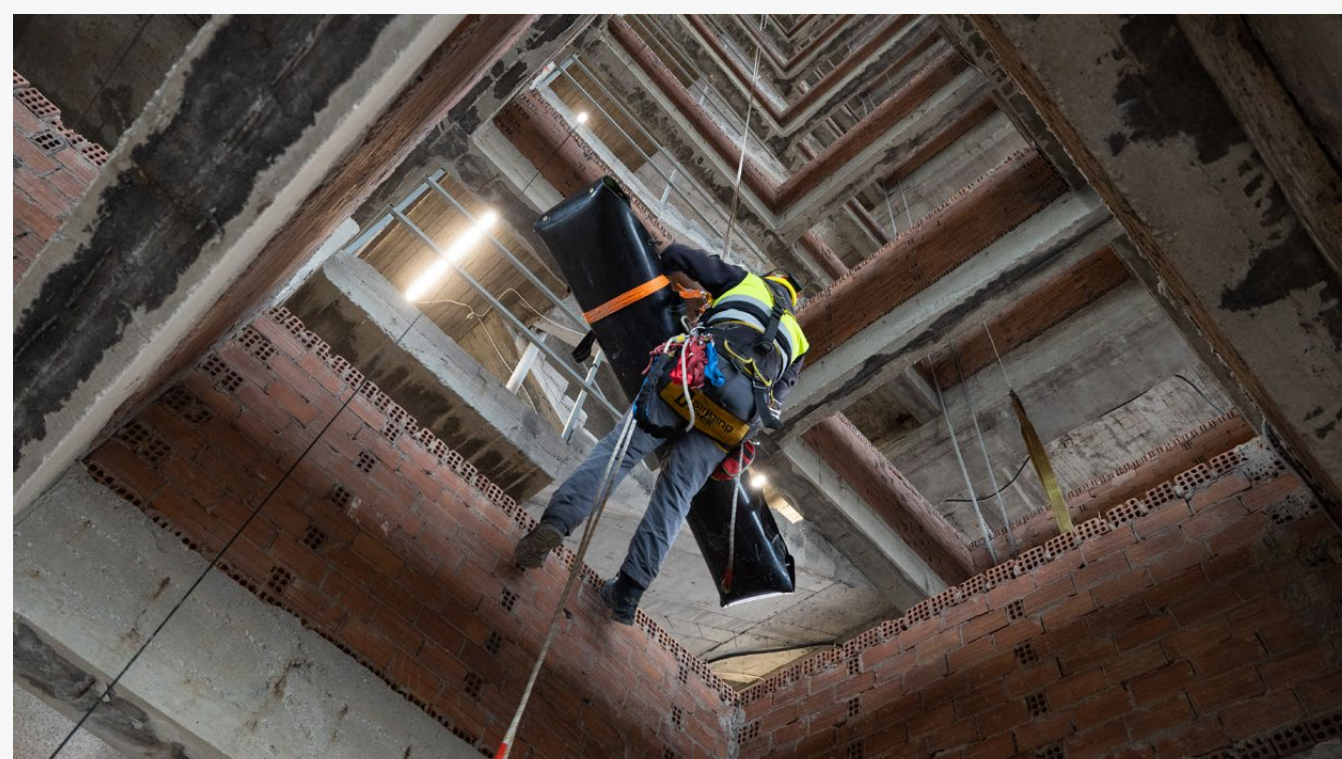


<sup>1</sup> Workers and staff who are not employees but whose work and/or workplace is controlled by the Group based in Bulgaria and Poland, are not covered by an externally audited health and safety system.



Senior Management takes all necessary measures to ensure the anonymity and confidentiality of all employees who submit their complaints, as well as to protect them from any retaliation, in accordance with the provisions of the Group's Code of Conduct. The investigation of H&S incidents is conducted by completing the relevant form of the Integrated Management System.

In 2023, there were no recorded workplace injuries.



H&S Performance Indicators	2023		2022	
	Employees	Workers who are not employees and whose work and/or workplace is controlled by the organization	Employees	Workers who are not employees and whose work and/or workplace is controlled by the organization
Number of hours worked	1,190,744	114,936	857,416	131,040
Number of fatalities as a result of work-related injury	0	0	0	0
Fatality Rate (FR) as a result of work-related injury	0	0	0	0
Number of high-consequence work-related injuries (excluding fatalities)	0	0	0	0
High-Consequence work-related Injury Rate (HCIR) (excluding fatalities)	0	0	0	0
Number of recordable work-related injuries	0	0	1	3
Rate of recordable work-related injuries (IR)	0	0	0.23	4.58
Main types and number of workplace-related injuries	-	-	-	-
Minor injury while using a ladder	0	N/A	1	N/A



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## H&S services

The Group acknowledges occupational safety as its highest priority and a prerequisite for its operation. In order to identify and eliminate risks, the Group cooperates with occupational physicians, who are responsible for systematically monitoring the health and well-being of all employees.

Also, Medical Fitness Certificates are necessary to be issued for all employees for the work they perform, while Safety Officers have been appointed, as the main advisory body on matters related to the health and safety of employees and the prevention of occupational accidents.



## Employee participation and engagement

The Group actively supports the participation and engagement of employees in the development, implementation and evaluation of the occupational H&S Management System.

### Employees are encouraged to report:

- dangerous situations so that preventive measures can be taken, and corrective actions applied.
- suggestions / recommendations for improvement regarding occupational H&S.

### The mechanisms for employee engagement are the following:

- Regular Meetings between Management and Facility Managers. During these meetings, issues related to the implementation of engagement mechanisms, the identification of risks and the assessment of threats and opportunities, resource requirements, the investigation of incidents, etc. are discussed.
- Regular Meetings between the Facility Manager and employees. During these meetings, discussions are held related to understanding the needs and expectations of interested parties, the assignment of roles and responsibilities, determining how to meet legal and other requirements, establishing goals and continuous improvement.
- Use of a Management System form, to record information regarding an event, including a description of the incident, relevant project, location, type of incident, possible causes, and corrective actions to be taken.
- Meetings and discussions of the Safety Officer with employees of each facility / project during the preparation / update of ORAs.
- Conducting trainings / briefings.
- Discussions with employees during facility visits / inspections.
- Internal communication (correspondence, e-mail, internal memos).





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## H&S training

Employees and subcontractors are provided with training programs on occupational risks and their prevention. Trainings are carried out prior to the commencement of activities (induction trainings), and during construction or operation of facilities during paid working hours for all employees.

**All employees (no exceptions) are trained by the Safety Officer or by other approved trainers on the following key issues\*:**

						
Occupational Health and Safety System	Use of Personal Protective Equipment (PPE)	Requirements of 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

## H&S benefits

The Group provides additional medical and healthcare services to its employees, such as health insurance including family coverage.

## Business relationships

The protection of health and safety also applies to interested parties in our supply chain. In this context, the Group ensures that contracts with its suppliers and partners, include terms for mandatory compliance with the applicable legislative and regulatory framework for occupational H&S. All Group partners must adhere to its policies, procedures, standards and Management Systems, while subcontractors' employees must also participate in the H&S trainings.

The Group frequently reviews its contracts with partners taking into account H&S criteria (e.g. number of trained – qualified personnel, risks arising from work-related activities, non-compliance with legal obligations) and does not hesitate to terminate the collaboration if any of these criteria are not met.



**In 2023, 1,512 hours of training and 65 H&S seminars** were implemented with the participation of 430 employees, 160 of which were subcontractors' employees.

\*The Safety Officer can add to the above educational subjects, depending on the specificity of the project and facilities.



GRI 404-1, 404-2 | ATHEX ESG C-S5

# 6.3 Employee training and development

The Group actively supports the professional development of its employees through the provision of continuous training and educational opportunities. Recognizing the value of human resources, we consistently invest in training programs, as well as in the effective evaluation of our employees, in order to develop their skills and their evolution, in alignment with the Group's strategic objectives.

The Group has a Training Policy that describes the framework of internal procedures regarding the training of the workforce and the dissemination of knowledge and experience. Emphasis is placed on changes and developments concerning the Divisions of Internal Audit, Risk Management, Regulatory Compliance, Information Systems, Information Security and Personal Data Protection.

## Employee evaluation and development

The Group aims in the continuous improvement and empowerment of its employees. On an annual basis, a performance evaluation system is implemented, seeking to guide them in their professional development and assess their contribution.

The evaluation system is an instrument to record the Group's overall performance while providing advice and feedback to improve individual performance of each employee. The target is to continuously improve their skills through the achievement of individual targets and merit-based rewards based on evaluation results.

### Practices to enhance education

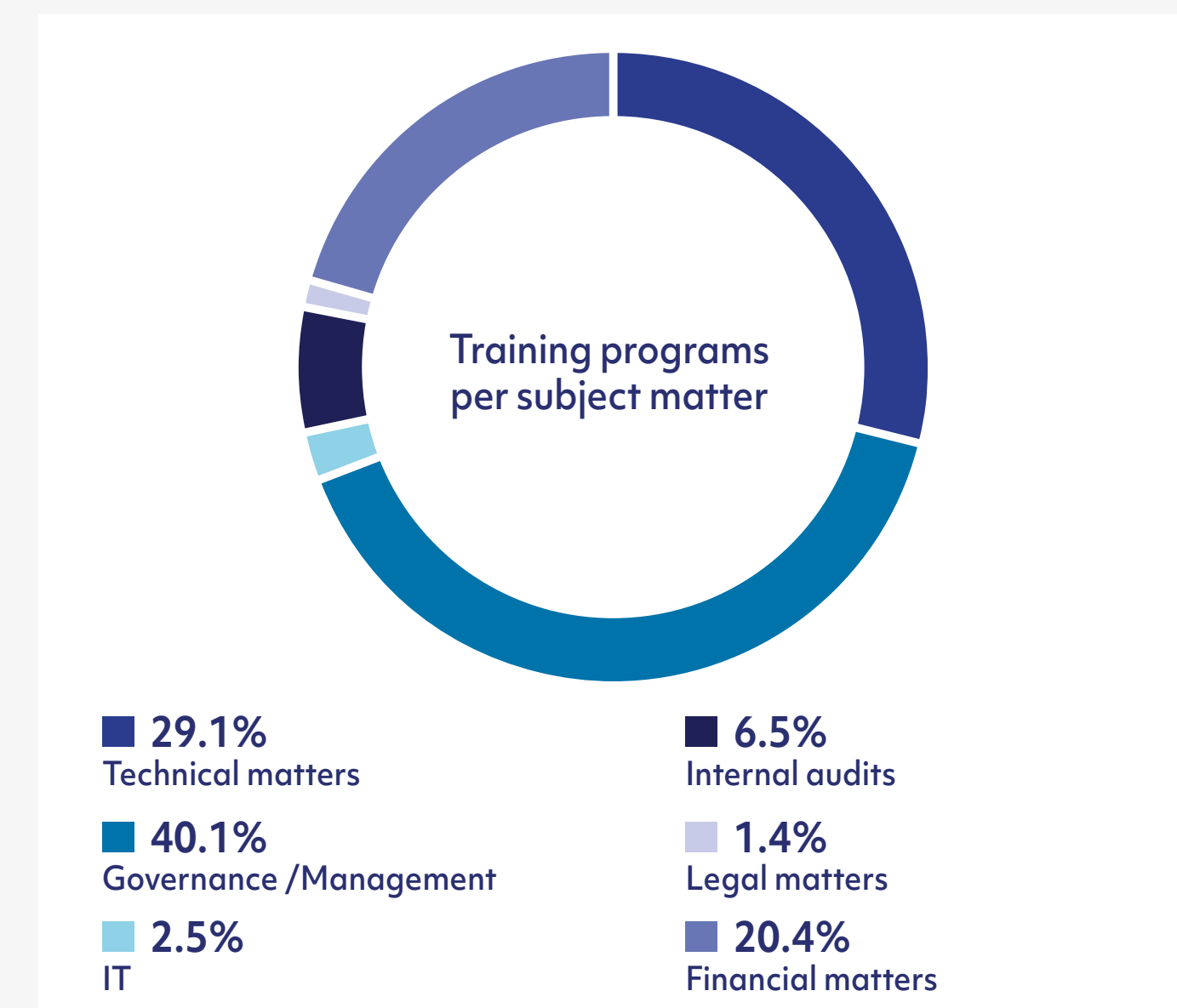
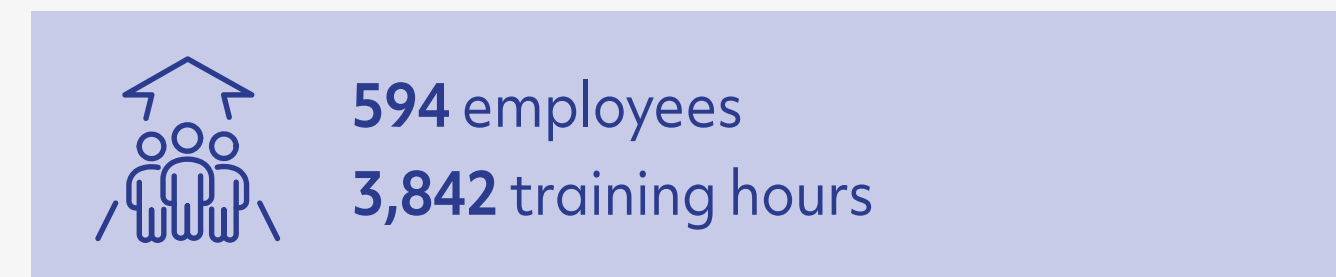
The Group systematically invests in training programs in order to enhance its employees' performance and upgrade their technical capabilities, but also to improve their ability to respond to emergency situations.

Education and training programs are specific and tailored to the scope of each position, strategic planning and human resources needs. In addition, on an annual basis, internal training is carried out by supervisors and specialized colleagues, covering topics such as H&S, environment, data protection, cyber security and the implementation of our Code of Conduct.

The Group's training plan includes the following categories of educational activities:

- In-house training programs
- Inter-company training programs by third parties
- Conferences/Workshops/Lectures/Exhibitions
- Certifications of professional qualifications
- Foreign language courses
- Postgraduate programs

Furthermore, in the context of continuous training of the Group's personnel, the e-learning platform was activated in early 2023 for distance learning of its human resources in various subjects (e.g. personal data, human rights, cybersecurity and the implementation of the Code of Conduct), enhancing the development of its employees.





GRI 2-24, 406-1, 408-1, 409-1 | ATHEX ESG C-S6


# 6.4 Human Rights

A prominent aspect of the Group's responsible business conduct is its commitment to respect human and labor rights, while actively promoting diversity. The Group's [Human Rights Policy](#) is published on its official website, ensuring accessibility by any stakeholder.


The Group acknowledges the risks of incidents regarding human rights across its supply chain. Such incidents can negatively impact the organization, including imposition of fines or sanctions, causing harm to employees and negatively affecting the reputation and/or trust between its stakeholders.

It is worth noting that no incidents of human rights violations were reported during 2023 in the Group.

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

 Sending an email to [compliance@terna-energy.com](mailto:compliance@terna-energy.com)

 Using the Group's platform <https://ternaenergy.integrityline.com/frontpage>

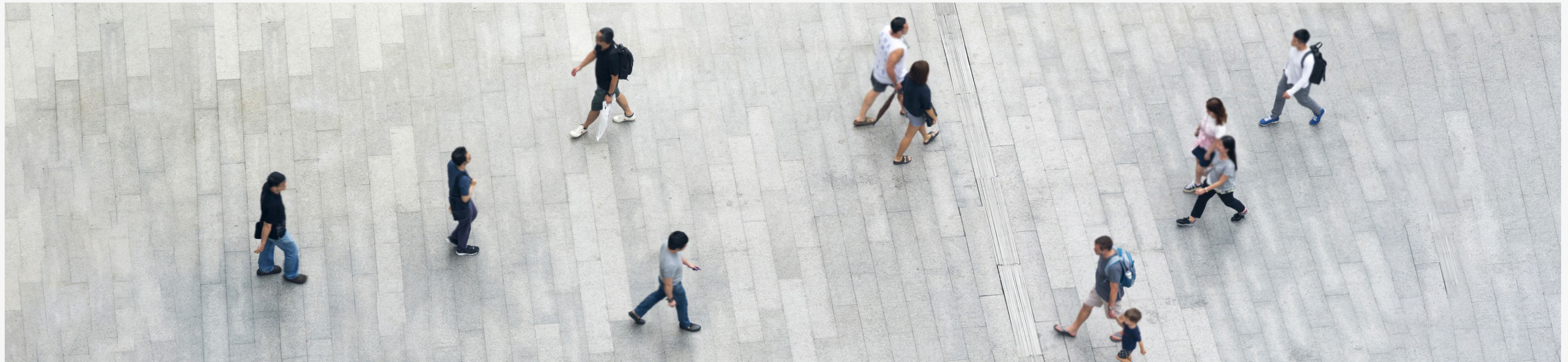
 Sending a letter to TERNA ENERGY S.A. 85, Mesogeion Ave, Athens 115 26, Greece, to the attention of the Company's «Regulatory Compliance Department», marked as «Confidential».

 Communicating verbally after a consultation with the Compliance Officer.

## Combating workplace violence and harassment

In order to ensure a healthy and safe workplace, the Group has adopted and implements a Policy against Violence and Harassment in the workplace, which recognizes and respects the right of every employee to a working environment free from violence and harassment, governed by respect, guaranteeing human dignity.

Through this policy, the Group expressly declares its zero tolerance to any incident of violence and harassment of any form, taking all appropriate and necessary measures to both prevent and address such incidents and forms of behavior.





GRI 3-3 | ATHEX ESG C-S8, SS-S10

# 6.5 Sustainable Supply Chain

The Group's business operations include a detailed assessment of the potential environmental, social and economic impacts in order to maximize its positive impact. Addressing supply chain challenges requires regular updates of management procedures and criteria, with a focus on strengthening collaboration with local suppliers to stimulate local communities.

In 2023, the Group implemented a Procurement Policy that defines the values and framework of professional conduct of its partners in Greece and abroad, while identifying the risks of potential violations of international standards.

## Suppliers evaluation

Supplier evaluation is a key component in the Group's supply chain management, selecting partners that comply with our policies and procedures, based on environmental, energy and social compliance criteria. Supplier selection is also based on ESG criteria and the evaluation process is implemented annually.



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# 07 Value Creation





GRI 3-3, 201-1, 204-1 | ATHEX ESG SS-E6, SS-S10

# 7.1 Creation of Direct and Indirect Economic Value

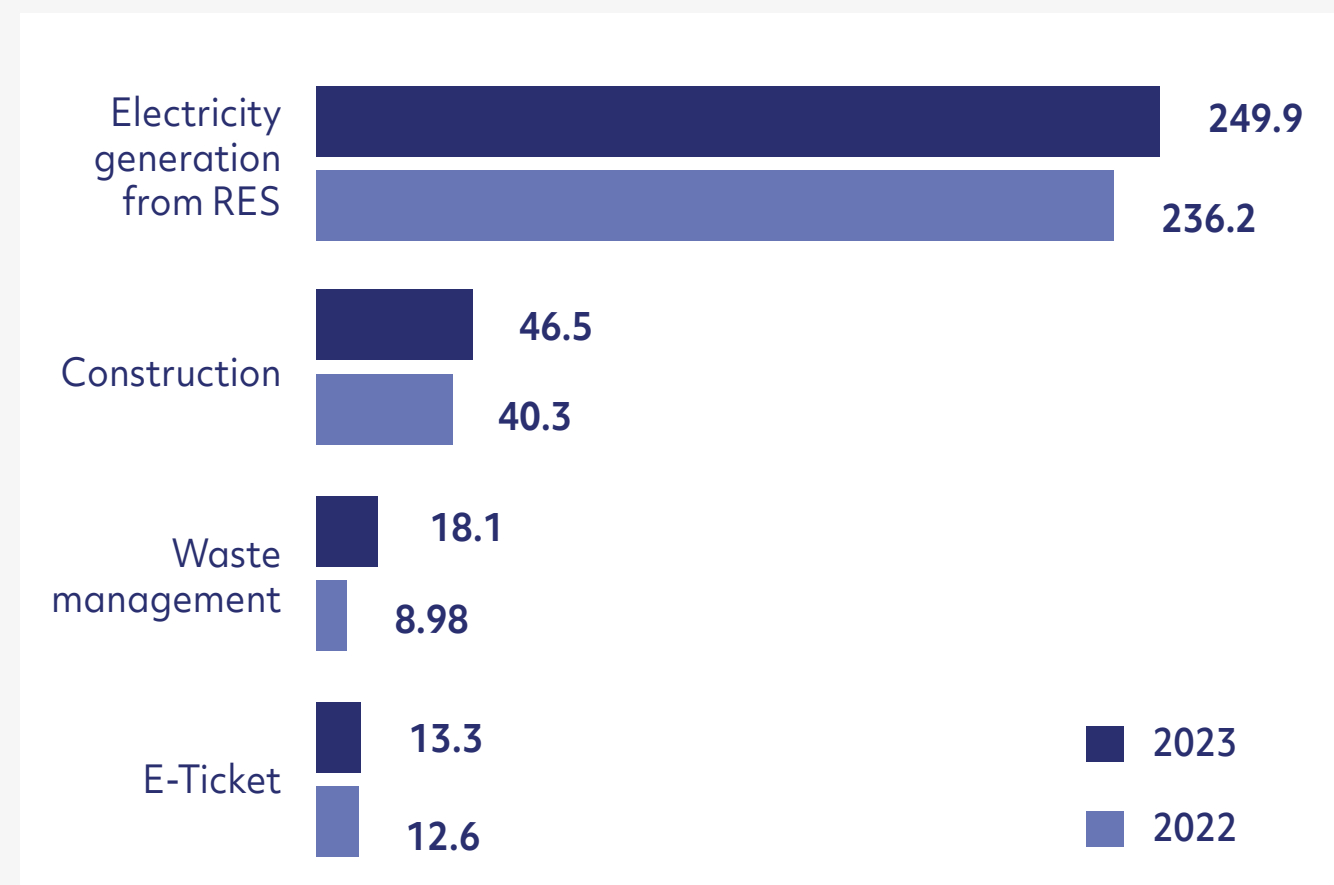
The Group's business success is inextricably linked to the generation and dissemination of economic value to the economy and society. By making significant investments and maintaining open communication channels with local communities, we confirm our long-standing contribution and build strong relationships of trust with our stakeholders. We also aim to distribute resources in a way that increases value for local communities alongside the development and success of our Group.

## 2023 investment activity

For yet another year, the seamless implementation of our investment program continued, creating the conditions for stabilizing increased revenue and profitability in the long-term.

**€ 218.9 mil. total investments**

### Turnover per activity sector (€ mil.)



During 2023, there were no cancellations or delays of our operations related to social impacts.

The following table presents the direct economic value generated and distributed

	Unit	2023	2022
<b>Direct Economic Value Generated</b>			
Revenues	thousand €	346,436	314,747
<b>Direct Economic Value Distributed</b>			
Operating costs	thousand €	139,098	156,958 <sup>1</sup>
Employee wages and benefits	thousand €	17,150	15,216
Payments to providers of capital	thousand €	114,081	79,304
<b>Payments/Contributions to the State, per country</b>			
Greece	thousand €	27,631	31,217
Cyprus	thousand €	85	298
Bulgaria	thousand €	91	133
Poland	thousand €	1,169	2,212
USA	thousand €	-31	1,139
Serbia	thousand €	0	5
N. Macedonia	thousand €	0	4
Community investments	thousand €	4,318	3,661
Direct economic value generated	thousand €	346,436	314,747
Direct economic value distributed (total)	thousand €	303,593	290,147 <sup>2</sup>
Direct economic value retained	thousand €	42,843	24,600 <sup>3</sup>

<sup>1,2,3</sup> Updated data due to recalculation



## Responsible sourcing with a preference for local suppliers

Responsible sourcing is one of the issues that affect the Group's environmental, social, and economic footprint and constitutes an integral part of its business operations. Our goal is to establish robust and reliable relationships primarily with local suppliers. For this reason, the Group strengthens its collaborations with local suppliers on an annual basis by creating relationships of trust in order to contribute to the stimulation of local communities and enhance its socio-economic footprint across its supply chain.

The [Group's Purchasing Policy](#) aims to create relationships based on a value system of mutual trust, transparency, collaboration, recognition, integrity and equal opportunities, in order to create long-term value, while incorporating ESG criteria in the selection process of suppliers, ensuring an environmentally and socially responsible supply chain framework.

### Basic principles:

-  Respect for human rights
-  Respect for freedom of association
-  Protection of the environment
-  Zero tolerance for incidents of violence and harassment
-  Promotion of occupational H&S
-  Equality, diversity & adoption of responsible work practices
-  Quality of products and services
-  Confidentiality and Personal Data Protection
-  Meritocracy & transparency / anti-corruption
-  Fair competition
-  Prohibition of forced labor and child labor
-  Tackling climate change

The Group's objective is to **create value** through its activities and operations.

### Percentage of purchase value from national and international suppliers<sup>1</sup>

	2023				2022			
	Purchase value in thousand €	Percentage of purchase value	Number of suppliers	Percentage of suppliers	Purchase value in thousand €	Percentage of purchase value	Number of suppliers	Percentage of suppliers
National suppliers	303,601	82.8%	2,962	82.5%	386,824	74.9%	1,827	91.5%
International suppliers	23,296	6.4%	620	17.3%	74,574	14.44%	157	7.9%
Related parties	40,001	10.9%	8	0.2%	55,148	10.7%	12	0.6%
<b>Total</b>	<b>366,898</b>	<b>100%</b>	<b>3,590</b>	<b>100%</b>	<b>516,546</b>	<b>100%</b>	<b>1,996</b>	<b>100%</b>

<sup>1</sup>National suppliers are suppliers who, in the reporting period 2023, supply the Group companies and are located in the same territory (country). International suppliers are suppliers who supply Group companies and are not located in the same territory (country). Only suppliers with a consolidated purchase amount in the reporting period of >€1,000 are counted. It is calculated algorithmically for the specific period. Related parties: as defined in IAS 24 «Related party disclosures» IFRS Joint Ventures, associates, and members of the BoD of Group companies.





GRI 3-3, 203-1, 204-1, 413-1 | ATHEX ESG SS-S10

## 7.2 Caring for the Local and Broader Society

Caring for local communities is among the Group's primary goals, recognizing that the promotion and development of local communities are crucial factors in the path to a sustainable future. With responsibility and social sensitivity, the Group supports local communities, increasing its positive impact and contributing to their growth.

### Social support

The Group's active role in local communities is reflected through the implementation of a comprehensive social contribution program of activities, that:

 <p>Strengthen the operation of social infrastructure and the work of local authorities.</p>	 <p>Improve the quality of life of local communities.</p>	 <p>Promote education and training of younger generations.</p>
 <p>Highlight the cultural heritage of each region.</p>	 <p>Raise environmental awareness among citizens.</p>	 <p>Advance culture and sports.</p>

In 2023, the Group's social contribution, through sponsorships, donations, and infrastructure projects in the areas where it operates amounted to **€4.3 million**.

### Indicative examples of activities in 2023

In Terna Energy Group, committed to the vision of improving the quality of life in local communities, we contribute across the spectrum of Sustainable Development, always focusing on people. Within this framework, we aim to maximize the positive social impacts of our activities, ensuring social acceptance and advancing sustainability.

Strengthening the relationships with local communities is achieved through the Group's strategy aimed at creating positive impacts in the areas of its operations. Indicative actions included in this strategy involve the creation of new jobs and the support of local suppliers and community groups, while prioritizing the socio-economic footprint of our projects. Furthermore, consultation with local communities is enhanced in order to build and maintain trusted relationships with our stakeholders.

#### Strengthening healthcare and primary sector infrastructure of Karystos, S. Evia

In Karystos, where the Group held most of its construction works in 2023, major infrastructure projects are developed to strengthen the primary sector of the region. The Group has also undertaken the construction costs of a significant project in the area, the Artificial Kidney Unit, a donation to the Municipality of Karystos which, upon completion, will have multiple and significant benefits for the quality of life of residents in the broader region.

#### Supporting young scientists

As every year within the same local sponsorship framework focused on the areas hosting our projects, the Group continued to support teams of emerging engineers from schools (STEM teams) and universities such as the TUC-er team from the Technical University of Crete, sponsored cultural and sport events throughout the country, as well as local teams, clubs and schools.

#### Protecting and promoting cultural heritage

In 2023 we sponsored cultural and sporting events throughout the country, local groups and associations as well as schools. Additionally, we supported actions directed towards research, protection and promotion of the rich cultural heritage of our country. These actions recognize the crucial role of cultural heritage and modern art.

#### Underwater antiquities research on the island of Kassos and its surrounding area

The Group continued for another year to support the Archaeological Research Program on the island of Kasos and its surrounding area.

At the end of October 2023, the archaeological field survey in the marine area of Kassos, which started in 2019, was completed. The survey was conducted by the Institute of Historical Research of the National Hellenic Research Foundation in collaboration with the Ephorate of Underwater Antiquities of the Ministry of Culture. A total of 10 shipwrecks and individual finds were revealed, dating from prehistoric times to the Ottoman period. The sunken remains of ancient ships carrying goods from Spain, Italy, Africa and the coast of Asia Minor shed light not only on the history of Kassos, which served as a crossroads of civilizations and a maritime centre at the time, but also on the entire Mediterranean region.



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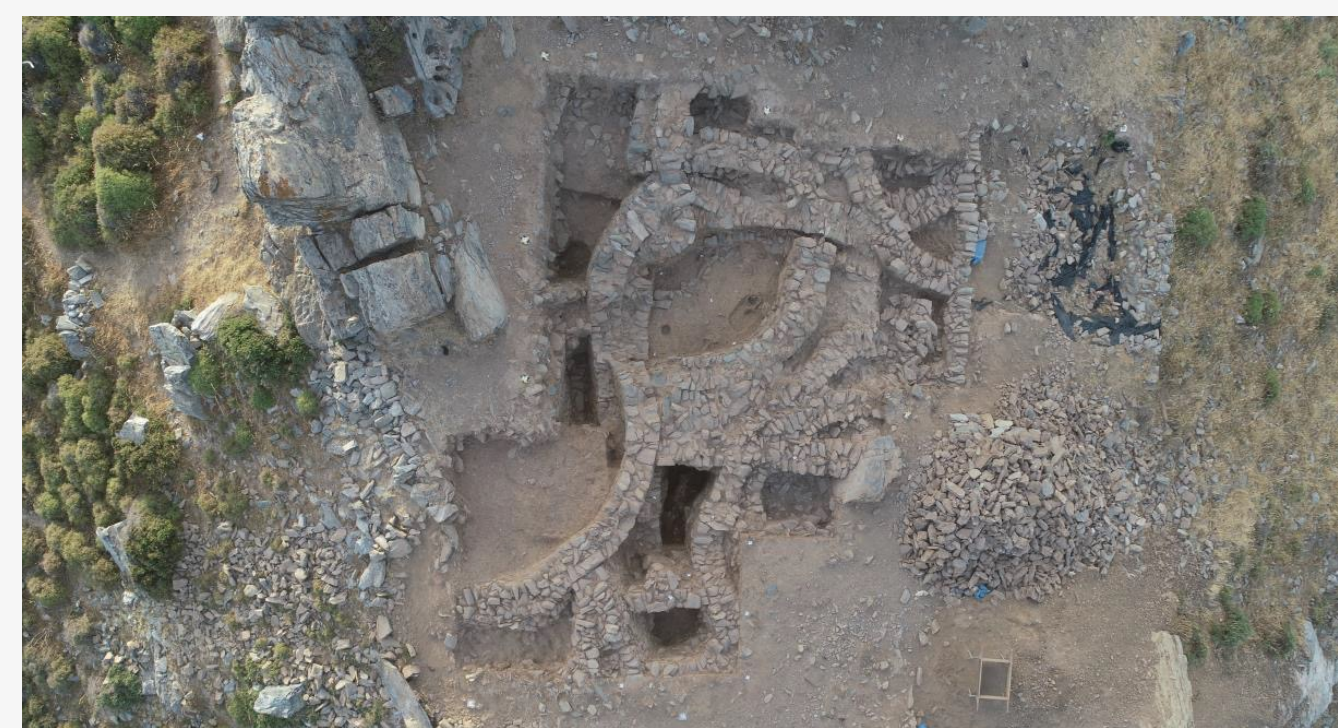
### Archaeological research program at the Mycenaean acropolis of Gla in Viotia

TERNA ENERGY continued to support the archaeological research program at the acropolis of Gla in Viotia under the auspices of the Archaeological Society of Athens. Systematic archaeological excavations brought to light new architectural remains, which, in combination with the movable artifacts uncovered during the excavation, highlight the role that Gla played in the broader socio-political environment of palatial northern Viotia.



### Archaeological research program at Gourimadi in Karystos, South Evia

Additionally, in South Evia, financial support was provided to the archaeological research program at Gourimadi site in Karystos, conducted under the auspices of the Norwegian Institute at Athens. Over the past five years, a prehistoric settlement has been revealed and research results confirm that this site is the oldest known settlement in South Evia (5th - 3rd millennium BC), with particular significance for early Aegean prehistory.



### Archaeological site of Kastri, Dystos

Last but not least, in the context of promoting the cultural heritage in areas where the Group operates, we undertook the cleaning of the trail network of Dystos Acropolis in Kymi-Aliveri municipality. These activities are conducted in collaboration with the Ephorate of Antiquities of Evia and contribute to the promotion and increase of the site's visibility and visitation.





GRI 3-3, 203-1, 204-1, 413-1 | ATHEX ESG SS-S10

# 7.3 Access to Green Energy

RES projects act as a catalyst in reducing the cost of electricity production and eliminating imported fossil fuels. Enforcing accessibility to green energy is a strategic priority, fully aligned with our investment plan to increase the installed capacity of our portfolio to 6GW by 2029.

## Reduction of electricity generation costs and compensatory benefits

The development and operation of RES projects reduces the need for electricity production from conventional energy sources and the consequent emissions of greenhouse gases, while contributing to mitigating energy shortage problems in specific regions of the country.

The Group's activity in the development of wind farms and hydroelectric projects, creates additional social benefits both directly through contributions, and indirectly through discounts on the electricity bills of local residents. Local communities receive 3% of the Group's gross annual revenue from electricity generation of each wind and hydroelectric project in operation, as well as from energy generated from its waste management and biogas production units.

In 2023, a total of €6.5 mil. were distributed to municipalities hosting the Group's facilities, corresponding to 3% of the Group's gross revenues from the operation of RES projects.



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# 08 Governance



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The Group is committed to responsible ethical corporate governance practices, grounded on principles of transparency and credibility. These practices guide the Group's approach across its business activities, ensuring its effective operation and evaluation.

Transparency, credibility and social responsibility define the manner in which the Group's corporate governance operates, allowing flexibility and adaptability within an environment of constant change and incremental economic, social and business challenges. These values guide the Group's daily practice and strategy, ensuring that all its business activities are conducted with absolute honesty, consistency and with a focus on social benefit.

Transparency refers to complete and open communication both internally and externally, allowing stakeholders to have a clear view of the organization's processes and performance.

Credibility refers to the trust partners, clients and employees can have in the Group.

Social responsibility refers to the Group's commitment to operate with respect for society and the environment, considering the impact of its decisions and actions.









The Board of Directors of TERNA ENERGY Group is its highest governing body, elected by the General Assembly of Shareholders. Its mission is to provide guidelines and form the Group's business strategy, ensure effective administrative operation, and implement the Group's principles and management philosophy. Additionally, the BoD decides on all corporate matters, excluding those falling under the authority of the General Assembly.

**PRESIDENT OF THE BoD**  
(executive member)

**Mr. Georgios Peristeris**

**VICE-CHAIRMAN OF THE BoD**  
(independent – non-executive member)

**Mr. Georgios Mergos**

**CEO**  
(executive member)

**Mr. Emmanuel Maragoudakis**

[Further information on the Group's BoD members is available on our website.](#)

**11**  
members

**27%**  
women participation

**5**  
years of tenure

**45%**  
independent members participation

For the Group's optimal operation, the BoD is supported by a set of Committees which have an advisory/recommendatory role, with significant weight in the decision-making process.

[Further information on the BoD's Committees is available on the Group's website.](#)

The ESG Committee ensures the optimal supervision of Sustainable Development issues and their effective management. The Committee meets at least four (4) times a year, or when required, to assess and review the Group's performance and goals regarding ESG issues. The ESG Committee consists of four (4) members, three (3) of which are Independent Non-Executive BoD members.

[Further information on the ESG Committee and its members is available on the Group's website.](#)

### Suitability Policy for the Members of the BoD

The Group has a [Suitability Policy](#) in place for its BoD members, established by the Nominations Committee, in accordance with L. 4706/2020. The Policy aims to ensure the effective staffing and operation of the BoD, in alignment with the Group's strategic, medium-term, and long-term business aspirations. According to the Policy, all BoD members must meet specific individual and collective suitability criteria.

### Training Policy for BoD members & Senior Executives

Appropriate and effective training of BoD members and Senior Executives is a matter of utmost importance for the Group. To achieve this goal, a specific policy has been established to ensure regular training of BoD members and Senior Executives on issues related to operations and organizational structure, the Group's business model, potential risks, but also financial and regulatory developments at an international and national level.

Additionally, the Policy provides the possibility for BoD members and Senior Executives to develop their skills and knowledge in order to effectively perform their duties in sectors like cyber security and business continuity.



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## Performance evaluation process for Senior Executives

The Group has established a dedicated procedure for the evaluation of Senior Executives' performance, aiming to ensure optimal operation of both the BoD and the Group.

The evaluation procedures include:

### CEO evaluation process



The evaluation process of CEOs is conducted on an annual basis and concerns the effective fulfillment of their duties, as defined by applicable legislation, the article of association and the Group's operational regulation, as well as the suitability policy. The evaluation is carried out by BoD members and 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.

### BoD members evaluation process



The self-evaluation process of the BoD members is conducted once a year and examines the effective performance of their duties based on specific individual suitability criteria in accordance with the Suitability Policy and obligations arising from applicable legislation in force. Supported by an external consultant, the Nominations Committee conducts the assessment of the BoD members. Additionally, the operation of the BoD's committees, including the ESG Committee, is also evaluated.

### Senior Executives evaluation process

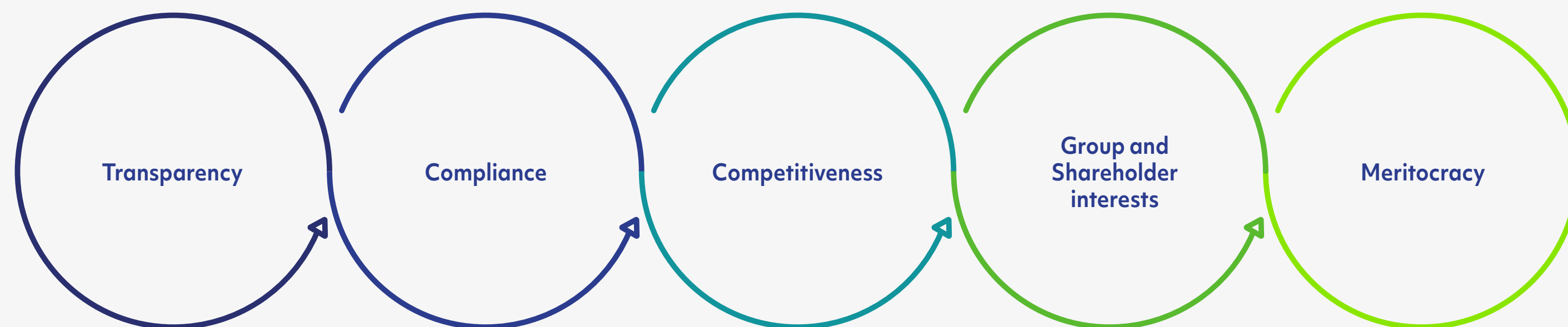


The evaluation process of Senior Executives is conducted once a year and examines the effective fulfillment of their duties based on specific quantitative and qualitative criteria defined in the Group's Evaluation System.

## Remuneration Policy for BoD members

The Group applies a Remuneration Policy outlining the terms for determining the compensation of BoD members and Senior Executives. The policy is fully aligned with the applicable legal framework, enhancing transparency in the process of determining and disbursing all forms of remuneration.

The guiding principles governing the Remuneration Policy are presented below:



The Remuneration Committee is responsible for the formulation of the Remuneration Policy, taking into consideration market conditions, competition, the significance of retaining Senior Executives and the attraction of capable new Executives. The Remuneration Committee in collaboration with an external consultant, reviews and revises the Policy following a study conducted regarding the range of salary levels in the market.

[Further information on the remuneration and benefits is available in the Remuneration Policy, on the Group's website.](#)





GRI 3-3, 2-10, 2-15, 2-16, 2-17, 2-18, 2-19, 2-20, 2-23, 2-24, 2-25, 2-26, 2-27, 205-2, 205-3 | ATHEX ESG C-S8, C-G1, C-G5 C-G6, A-G2, SS-S9

## 8.2 Business Ethics

Business ethics and regulatory compliance are a key priority for TERNA ENERGY Group, affecting stakeholders across its value chain, including employees, suppliers, partners and authorities. Continuous reinforcement of these principles is one of the main objectives of the Group.

For this purpose, the Group implements a Certified Anti-Corruption and Anti-Bribery Management System according to [ISO 37001:2016](#) standard requirements. Additionally, a Regulatory Compliance Management System is in place aligned with the international standard [ISO 37301:2021](#) and certified by an accredited third party.

**Specific policies are also implemented ensuring the Group's effective operation and providing a defined framework for achieving its objectives:**

 <b>Code of Conduct</b>	 <b>Policy against Violence and Harassment in the workplace</b>	
 <b>Human Rights Policy</b>	 <b>Conflict of Interest Policy</b>	 <b>Procurement Policy</b>
 <b>Gifts Policy</b>	 <b>Regulatory Compliance and Corruption &amp; Bribery Control Policy</b>	
 <b>Unfair Competition Policy</b>	 <b>Travel and Hospitality Expenses Policy</b>	 <b>Remuneration Policy</b>
 <b>Sponsorship and Donations Policy</b>	 <b>Whistleblowing Policy</b>	 <b>Due Diligence Procedure</b>

### Code of Conduct (CoC)

The [Code of Conduct](#) integrates the fundamental principles, beliefs, corporate culture, operational ethics, and voluntary ethical commitments of the Group, shaping its operational model across its activities. The Code captures and strengthens these elements, creating a cohesive and transparent framework of operation and behavior that applies to all employees, customers, partners, subcontractors, suppliers, and local communities.

The Code applies to all Group subsidiaries and activity sectors in every country of operation, and it is considered in its Partnerships and Joint ventures. While the content of the Code is not exhaustive, it includes minimum requirements that must be implemented at the level of people management (e.g., Health and Safety of employees and partners) and at the governance level (e.g., anti-bribery practices, fair competition, etc.). These minimum commitments are supplemented by policies, procedures and other internal documents that are equally binding for everyone.

The content of the Code aligns with the general principles prescribed by international regulations and conventions, as well as international standards. To ensure their implementation, the Group undergoes periodic audits by accredited third parties and has acquired relevant certifications.








## Reporting Code of Conduct violations

The Code of Conduct serves as a comprehensive framework that encompasses issues related to labor and human rights. Specific topics, such as combating workplace violence, human rights abuses, etc., are further addressed through specific policies and internal procedures.

The Group, guided by the Code of Conduct which highlights integrity, transparency and professionalism, while demonstrating zero tolerance for corruption, bribery, and any unethical behavior, and complying with the requirements of Law 4990/2022 on Whistleblowing, has approved and implements a [Whistleblowing Policy](#) under which it has designated an Officer responsible for the Receipt and Monitoring of Reports (RMO).

Every employee can report or express concerns regarding any issue related to the implementation of the Code of Conduct, either openly or anonymously by:

-  Sending an email to the following address [compliance@terna-energy.com](mailto:compliance@terna-energy.com)
-  Using the online platform <https://ternaenergy.integrityline.com/frontpage>
-  Sending a letter to the address TERNA ENERGY S.A. 85, Mesogeion Ave., Athens 115 26, Greece, to the attention of the «Compliance Unit» of the Company, marked as «Confidential»
-  A phone call (Monday to Friday: 9:00 - 17:00) at 2106968300 contacting the Receiving and Monitoring Officer (RMO).
-  A personal meeting with the RMO during business hours and days (Monday to Friday: 9:00 - 17:00), within a reasonable period of time from the submission of a request for a personal meeting.

During 2023

- There were no confirmed incidents of corruption, either through complaints or through the Group's internal audits for preventing and combating any incidents of corruption.
- There were no financial losses due to breaches/violations of business ethics.

## Continuous information and training

To ensure the correct application and operation of the Code of Conduct, training sessions are conducted (both in-person and online). As part of this effort, an annual and ad-hoc e-learning session titled «Regulatory Compliance, Code of Conduct, Corruption and Bribery Control» is conducted. The objective of this session is to explain the concepts and requirements of the Anti-Corruption, Anti-Bribery and Regulatory Compliance Management Systems, and the Code of Conduct. It also includes presentations of cases and scenarios of misconduct, acts of corruption, and bribery.

	2023
Number (or percentage) of management executives who have been informed and trained on anti-corruption policy/procedures	100%
Number (or percentage) of division directors who have been informed and trained on the anti-corruption policy/procedures	100%
Number (or percentage) of employees who have been informed and trained on anti-corruption policy/procedures	100%
Number of lawsuits related to anti-competitive behavior and violations of antitrust and monopoly laws	0



## Dealing with conflicts of interest

The procedures and practices applied to ensure the prevention of conflicts of interest are described in detail in the [Code of Conduct](#), published on the Group's website.

The Group has also developed a specific Conflict of Interest Policy establishing guidelines every employee must follow in matters of conflict of interest that affect or may affect the Group's interests and its affiliated companies, as well as the interest of its customers, suppliers and partners.

### The objectives of this Policy are as follows:

- Identification of potential conflict of interest situations between personnel and the Group.
- Establish rules that must be applied by all employees for the effective management of such situations when they arise.
- Assignment of roles and responsibilities for the implementation of the Policy.
- Ensuring compliance with regulatory and supervisory frameworks.

### In order to achieve the above objectives, the Group implements appropriate preventive measures and commits to the following:

- a. Raising awareness and conducting trainings to employees and BoD members on the Code of Conduct and applicable Policies and Procedures to safeguard the reputation, prestige and transparency of the Group.
- b. Establishing control mechanisms and prevention measures to promptly identify and manage conflict of interest issues. These mechanisms aim to ensure that all employees and BoD members act without prejudice regarding the Group's interests.
- c. Implementing information security mechanisms to protect and properly manage confidential and classified information. Access to this type of information must be given in a controlled manner and only to specific individuals who, following an evaluation process, have been considered eligible to require such information to perform their duties.
- d. Monitoring transactions through the Internal Audit Unit (IAU). The IAU monitors on a regular basis the transactions of covered persons in financial instruments of the Group, in order to identify potential transactions that contradict the Group's interests, and/or incidents of possible abuse of privileged information.



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## Terms of cooperation with suppliers

The primary objective is to foster responsible and sustainable supply chains and to generate long-term value for suppliers, partners and communities. The Group acknowledges that responsible management of the supply chain is a fundamental component of its business operations. Consequently, the Group ensures that its suppliers align with the environmental, energy and social criteria outlined in the relevant [Purchasing Policy](#) established in 2022.

### Indicative criteria set out in the Policy are:



Certification according to international standards such as ISO 14001 and ISO 50001.



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



The supply and use of materials and equipment, which apart from their suitability and usability, meet high health and safety standards, are environmentally friendly and belong to a high energy class with low energy consumption.

Required terms of cooperation with any supplier, subcontractor and partner include full compliance with the regulatory framework for Health and Safety, environmental management and adherence to the Group's Code of Conduct.





GRI 3-3, 2-25, 2-27 | ATHEX ESG SS-S9

## 8.3 Regulatory Compliance

Regulatory compliance and control of corruption and bribery are key principles of the Group's voluntary commitments and responsible governance mechanisms. The [Regulatory Compliance, Corruption and Bribery Control Policy](#) outlines the Group's goals for the effective management of these issues.

### Prevention mechanisms and measures applied under this Policy include:

- Clear definition of the principles governing the Group regarding regulatory compliance and the control of corruption and bribery, through the Code of Conduct and applied Policies.
- Clear definition of responsibilities through the Internal Regulation of Operation.
- Different levels of approval clearly defined in the Internal Regulation of Operation and in the decisions of the Board of Directors.
- Application of the four-eye principle and double signatures in the Group's procedures.
- Continuous staff training and awareness.
- Due diligence actions in the selection of partners, suppliers, staff, sub-contractors and customers.
- Scheduled and random audits conducted by the Group's Internal Audit Unit.
- Scheduled and random internal audits conducted by the Regulatory Compliance Officer.
- Reporting and Managing Complaints/Reports.
- Independence of the Regulatory Compliance Officer.
- Implementation of procedures for managing conflicts of interest.
- Continuous improvement of Management System efficiency.
- Operation of a mechanism for evaluating incidents of non-compliance with obligations.
- Development and implementation of specified Policies on issues of regulatory compliance, corruption and bribery, such as the Policy against unfair competition, travel and hospitality Policy, gifts Policy, sponsorship and donations Policy.



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GRI 3-3, 418-1 | ATHEX ESG SS-G2, SS-G3, SS-S5 | SASB IF-EU-550a.1

# 8.4 Business Continuity

Through its Business Continuity Policy, the Group identifies potential risks that could threaten its operation and allocates all necessary resources for the implementation of the Business Continuity Management System, in accordance with international standard [ISO 22301:2019](#) in order to:

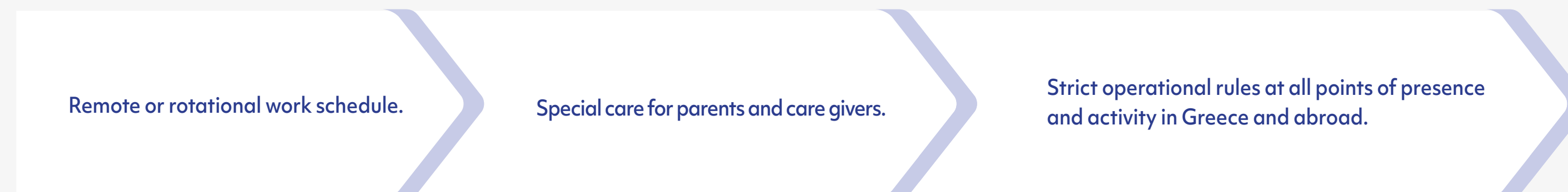
- **Ensure the Business Continuity of critical operations in case of an event leading to unavailability or inability to perform them.**
- **Return to acceptable levels of operation as soon as possible.**

The implementation of the Business Continuity Management System is an important tool for the operation of the organization in potential crisis situations.

## Business continuity plan

The Plan establishes strict rules of operation, monitored on a daily basis by a dedicated team comprising of Group executives and specialized scientific experts.

**The Business Continuity Plan includes provisions such as:**



## Emergency response plan

The Group recognizes the importance of immediate and effective management of emergency situations to protect its employees and partners from potential risks. Before the commencement of construction or operation of a project or facility, a detailed Emergency Response Plan is developed. This plan outlines all direct and indirect actions that need to be taken, as well as the resources and means each facility must have in place for effective emergency management.

The Group pays special attention to facilities located in remote or isolated areas, applying specific measures to ensure timely emergency response. A notable example is the Wind Farm on the island of Agios Georgios, where a special collaboration is in place with a private helicopter ready to intervene immediately in case of an emergency. Additionally, during the construction of Kafireas wind farms, a private ambulance was available to promptly address emergencies.

## Emergency drills

The Group ensures the preparedness level of its employees and partners in emergency situations by conducting regular emergency drills. These exercises involve simulating critical incidents such as occupational accidents, fires, earthquakes, that require prompt and effective responses of staff present in the Group's operational sites and facilities.

**Through the emergency drill exercises, the Group checks and evaluates:**

- ✓ The adequacy of plans and procedures that should be implemented.
- ✓ The level of cooperation and responsiveness of involved Divisions, Authorities, other entities and employees.
- ✓ The need to fill gaps in roles and responsibilities of those involved.
- ✓ The availability of necessary resources.

The emergency drill exercises conducted in 2023 revealed a high level of staff preparedness - response. Weaknesses and malfunctions identified during the exercises were corrected, and there was an improvement in the safety mindset among the Group's employees.





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## Employee training

The Group's Emergency Response Plan ensures the continuous awareness and training of its employees on relevant issues, in order for them to be able to protect themselves, their colleagues and partners, as well as the environment by recognizing, recording/communicating and reducing potential causes of accidents.

**The training actions and programs aim to:**

Enhance the  
readiness levels of  
employees.

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

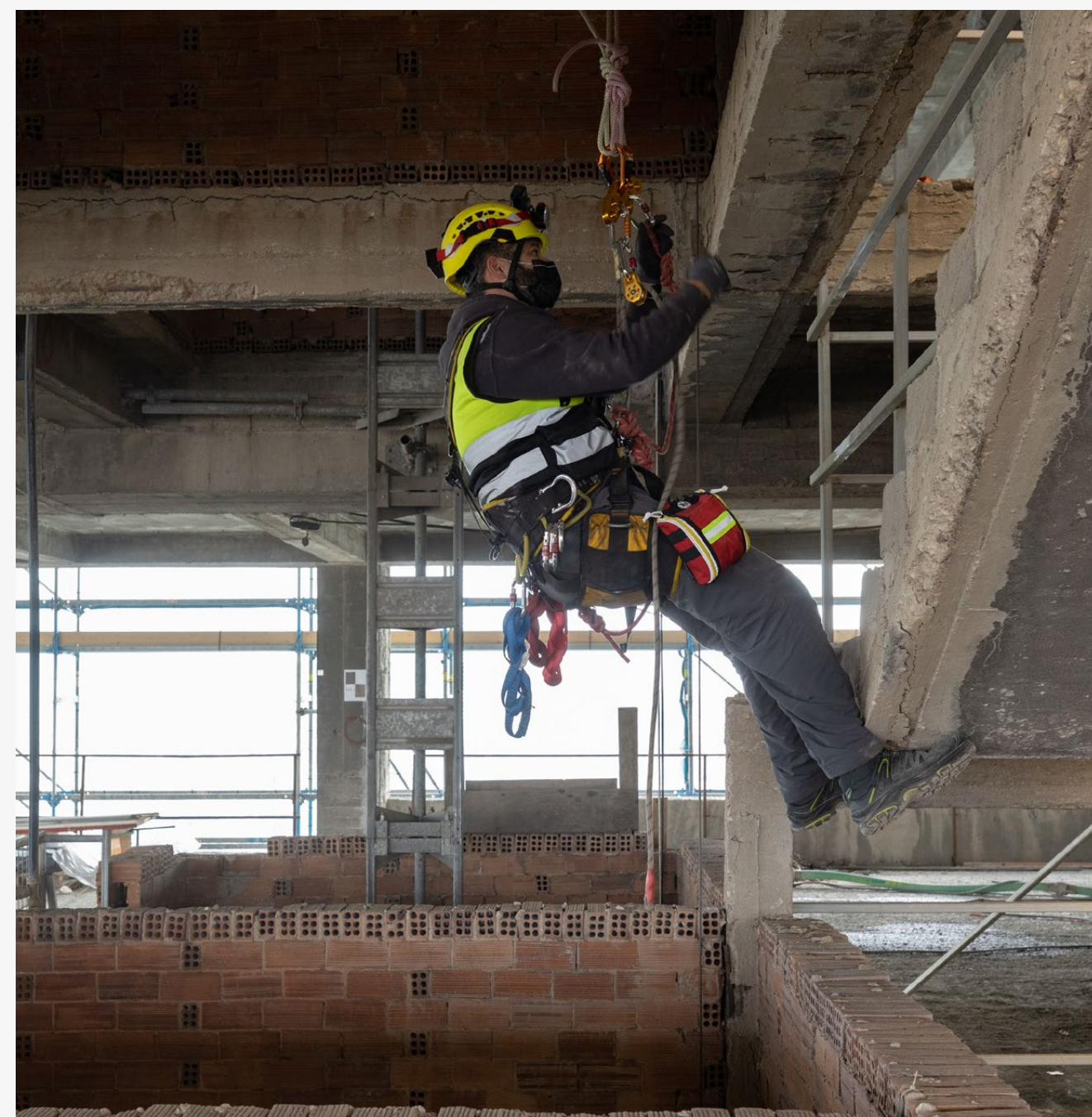
Integrate the  
knowledge  
acquired from past  
incidents and their  
handling.

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

## Risk management

The identification, assessment, and management of existing and potential risks are integral parts of the Group's operations, influencing decision-making processes and the implementation of its business model. Responsible executive personnel maintains daily communication with senior management to promptly recognize risks and take appropriate measures to address them.

The Group employs a [risk assessment procedure](#) that encompasses systems such as ISO 9001, 14001, 45001, 50001, 27001, 37001, and 37301. Within this procedure, risk factors for each activity and process are analyzed, along with their impacts (threats and opportunities). Existing control measures are documented and the level of risk severity is scored by considering the severity of the potential impact and the likelihood of each risk occurring.



## Policy for the protection of personal data

The protection of personal data of individuals engaging with the Group is a matter of utmost importance for regulatory compliance, as emphasized in the Code of Conduct and the overall business ethics that characterize all activities and collaborations of the Group.

In pursuit of maintaining a high level of security commensurate with the criticality and confidentiality of the data and information handled by the Group, a specific Policy for the Protection of Personal Data is implemented. Additionally, an Information Security Management System is in place certified under the international standard ISO/IEC 27001:2013.

Additionally, an Information Security Management System Manager has been appointed who collaborates with the Chief Information Security Officer (CISO) and the Personal Data Protection Unit in order to monitor the Group's compliance with relevant laws and regulations. The Group has also appointed a Data Protection Officer (DPO) to ensure compliance with both EU and national regulatory frameworks. The DPO reports to the Board of Directors and is responsible for implementing appropriate measures to protect personal data processed by individuals involved in data processing activities on behalf of the Group. Policies and procedures regarding data subjects' rights and incident management are integral parts of these measures.

### In 2023:

- No reports of customer privacy breaches and data losses were recorded.
- No incidents of detected leaks, theft or loss of customer data were recorded

[Further information on the Personal Data Policy is available on the Group's website.](#)



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# 09 Appendices





GRI 2-2,2-3,2-4,2-5 | ATHEX ESG A-G5

# 9.1 About this Report

This Report constitutes the 9th Sustainability Report of TERNA ENERGY Group. The Group publishes its financial statements for the same period and additional interim half-yearly financial statements.

The present report encapsulates the Group's corporate actions pertaining to sustainable development and corporate responsibility, emphasizing our commitment to continuous improvement and creating long-term value for all its stakeholders.

The objective of the report is to provide accurate and comprehensive information regarding the Group's actions, performance and commitments on environmental, social and governance issues, using quantitative and qualitative data for the period 01/01/2023 to 21/12/2023.

The responsibility for the calculation, collection and consolidation of quantitative and qualitative information included in this report, belongs to TERNA ENERGY Group.

## Scope and range

The data of the report refers to TERNA ENERGY Group and more specifically offices and facilities of the Group and its subsidiaries in Greece, Bulgaria, Poland and Cyprus. It is also noted that there are no substantial restatements or variations compared to the previous report of the Group, published in 2023 covering the period 01/01/2022 to 31/12/2022. Restatements of minor significance due to recalculations are indicated with relevant footnotes where required in the report.

## Defining content

This Report was prepared in accordance with the Sustainability Reporting Guidelines of the new GRI Universal Standards (GRI 1, GRI 2, GRI 3) and GRI Topic Standards, aiming at meeting the needs and expectations of its stakeholders, as well as highlighting the Group's contribution to sustainable development. The content of this report was also prepared in accordance with the Sustainability Accounting Standards Board (SASB Standards) and the ESG Information Disclosure Guide of Athens Stock Exchange (ATHEX), while the impacts of the Group are aligned with the 17 Sustainable Development Goals of the United Nations (SDGs).

The analysis of the Group's material sustainability topics derived through the double materiality assessment, determined to a significant extent the content of this report, which focuses on the most important issues of concern for its stakeholders with significant effects on an environmental, social and economic level.

For the 2023 Sustainability Report, the Group has not proceeded with external assurance of its content.



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

### CONTACT PERSON FOR THE SUSTAINABLE DEVELOPMENT REPORT:

**Danae Kalantidi**  
85, Mesogeion Ave., Athens, 11526 Greece  
P: 210 69680000, F: 2106968098-99,  
E: dkalantidi@gekterna.com

### COORDINATOR

Division of Corporate Social Responsibility and Sustainable Development

### DIRECTORATES / DIVISIONS:

- Quality, Health & Safety, Environment and Standards
- Human Resources
- Financial Directorate

### ART DIRECTOR

George Charitos

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## 9.2 GRI Content Index

**STATEMENT OF USE:** TERNA ENERGY has reported in accordance with the GRI Standard for the period 01/01/2023 - 31/12/2023

**GRI USED:** GRI 1: FOUNDATION 2021

**APPLICABLE GRI SECTOR STANDARDS:** N/A

GRI Standard	Disclosure	Report Section	Page
<b>General Disclosures</b>			
<b>GRI 2: General Disclosures</b>	2-1 Organizational details	TERNA ENERGY Group	23-29
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	2-3 Reporting period, frequency and contact point	About this Report	70
	2-4 Restatement of information	About this Report	70
	2-5 External assurance	About this Report	70
	2-6 Activities, value chain, and other business relationships	Our Group at a Glance Activities, Value Chain and Business Relationships Business Model	24-28
	2-7 Employees <sup>1</sup>	Employment Practices	43-44
	2-8 Workers who are not employees	Employment Practices	43-44
	2-9 Governance structure and composition	Corporate Governance Model	60-61
	2-10 Nomination and selection of the highest governance body	Corporate Governance Model	61-62
	2-11 Chair of the highest governance body	Corporate Governance Model	60-61
	2-12 Role of the highest governance body in overseeing the management of impacts	Sustainable Development Policy Corporate Governance Model	10 61
	2-13 Delegation of responsibility for managing impacts	Sustainable Development Policy Corporate Governance Model	10 61
	2-14 Role of the highest governance body in sustainability reporting	Sustainable Development Policy Double Materiality Assessment	10 14-17
	2-15 Conflicts of interest	Business Ethics	63-64

<sup>1</sup>The detailed values of the indicator are included in «ESG Key Performance Index 2023» (Working Conditions for the Workforce, pg 15-17)



GRI Standard	Disclosure	Report Section	Page
<b>General Disclosures</b>			
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	2-24 Embedding policy commitments	Human Rights Business Ethics	50 63-65
	2-25 Processes to remediate negative impacts	Regulatory Compliance Business Ethics	66 64
	2-26 Mechanisms for seeking advice and raising concerns	Business Ethics	64
	2-27 Compliance with laws and regulations	Environmental Care Regulatory Compliance Business Ethics	31 66 63-64
	2-28 Membership associations	Memberships	29
	2-29 Approach to stakeholder engagement	Our Stakeholders	11
2-30 Collective bargaining agreements	Employment Practices	43-44	
<b>Material Topics</b>			
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	3-2 List of material topics	Double Materiality Assessment	14-21
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GRI Standard	Disclosure	Report Section	Page
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		Water Management	37
		Waste Management and Circular Economy	38
<b>GRI 302:</b> Energy	302-1 Energy consumption within the organization	Climate change Mitigation and Adaptation	34-35
	302-3 Energy intensity	Climate change Mitigation and Adaptation	34-35
<b>GRI 303:</b> Water and effluents	303-3 Water withdrawal <sup>1</sup>	Water Management	37
	303-4 Water discharge <sup>2</sup>	Water Management	37
	303-5 Water consumption <sup>3</sup>	Water Management	37
<b>GRI 304:</b> Biodiversity	304-2 Significant impacts of activities, products and services on biodiversity	Protection of Biodiversity	36
<b>GRI 305:</b> Emissions	305-1 Direct (Scope 1) GHG emissions	Climate change Mitigation and Adaptation	33-34
	305-2 Indirect (Scope 2) GHG emissions	Climate change Mitigation and Adaptation	33-34
	305-3 Other indirect (Scope 3) GHG emissions	Climate change Mitigation and Adaptation	33-34
	305-5 Reduction of GHG emissions	Climate change Mitigation and Adaptation	33-34
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Climate change Mitigation and Adaptation	34
<b>GRI 306:</b> Waste	306-1 Waste generation and significant waste-related impacts	Waste Management and Circular Economy	38
	306-2 Management of significant waste-related impacts	Waste Management and Circular Economy	38
	306-3 Waste generated	Waste Management and Circular Economy	38
	306-4 Waste diverted from disposal	Waste Management and Circular Economy	38
	306-5 Waste directed to disposal	Waste Management and Circular Economy	38

<sup>1,2,3</sup> The index values are included in the « ESG Key Performance Index 2023» (Withdrawal – Consumption - Use)



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GRI Standard	Disclosure	Report Section	Page
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		Employee Training and Development	50
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<b>GRI 401:</b> Employment	401-1 New employee hires and employee turnover	Employment Practices	43-44
	401-2 Benefits provided to full-time employees that are not provided to temporary or part time employees	Employment Practices	43-44
<b>GRI 403:</b> Occupational Health	403-1 Occupational health and safety management system	Occupational Health and Safety	45
	403-2 Hazard identification, risk assessment, and incident investigation	Occupational Health and Safety	45-46
	403-3 Occupational health services	Occupational Health and Safety	47
	403-4 Worker participation, consultation, communication on occupational health and safety	Occupational Health and Safety	47, 48
	403-5 Worker training on occupational health and safety	Occupational Health and Safety	48
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational Health and Safety	45
	403-8 Workers covered by an occupational health and safety management system	Occupational Health and Safety	47-48
	403-9 Work-related injuries	Occupational Health and Safety	46
	<b>GRI 404:</b> Environmental Compliance	404-1 Average hours of training per year per employee <sup>1</sup>	Employee Training and Development
404-2 Programs for upgrading employee skills and transition assistance programs		Employee Training and Development	49
<b>GRI 405:</b> Diversity and Equal Opportunity	405-1 Diversity of governance bodies and employees	Employment Practices Corporate Governance Model	43-44 61
<b>GRI 406:</b> Non-discrimination Environmental Compliance	406-1 Incidents of discrimination and corrective actions taken	Human Rights	50
<b>GRI 408:</b> Child Labor	408-1 Operations and suppliers at significant risk for incidents of child labor	Human Rights	50
<b>GRI 409:</b> Forced or Compulsory Labor	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	Human Rights	50

<sup>1</sup> The index values are included in the « ESG Key Performance Index 2023» (Working Conditions for the Workforce)



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GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Caring for the Local and Broader Society	55-56
GRI 204: Procurement practices	204-1 Proportion of spending on local suppliers	Creation of Direct and Indirect Economic Value	54
GRI 413: Local communities	413-2 Operations with local community engagement, impact assessments, and development programs	Caring for the Local and Broader Society	55

GRI Standard	Disclosure	Report Section	Page
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# 9.3 ESG Index Table | ESG Information Disclosure Guide of the Athens Stock Exchange (ATHEX ESG Reporting Guide 2024)

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	C-S4	Employee turnover	Employment Practices	43-44
	C-S5	Employee training	Occupational Health and Safety, Employee Training and Development	48, 49
	C-S6	Human rights policy	Human Rights	50
	C-S7	Collective bargaining agreements	Employment Practices	43
	C-S8	Value chain	Sustainable Supply Chain, Employee Training and Development	51, 65
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C-G2		Sustainability oversight	Sustainable Development Policy	10
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ESG Classification	ID	Metric Title	Report Section	Page
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	SS-G3	Critical Risk Management	Business Continuity	67-68

<sup>1,2</sup>The detailed values of the indicator are included in the « ESG Key Performance Index 2023» (Waste)

<sup>2</sup>The detailed values of the indicator are included in the «ESG Key Performance Index 2023» (Water)



## 9.4 SASB Index Table | Electric Utilities & Power Generators

Topic	Code	Accounting Metric	Report Section	Page
<b>GHG emissions and energy resource planning</b>	IF-EU-110a.1	(1) Gross Global Scope 1 Emissions (metric tons of CO <sub>2</sub> e) (2) Percentage Covered under Emissions-Limiting Regulations, and (3) Percentage Covered under Emissions-Reporting Regulations	Climate change Mitigation and Adaptation	33-34
<b>Air Quality</b>	IF-EU-120a.1	Emissions of the following pollutants: (1) NO <sub>x</sub> (excluding N <sub>2</sub> O), (2) SO <sub>x</sub>	Climate change Mitigation and Adaptation	34
<b>Water Management</b>	IF-EU-140a.1	(1) Total water withdrawn (2) Total water consumed, percentage of (1) and (2) in regions of high or Extremely High Baseline Water Stress	Water Management	37
<b>Employees Health and Safety</b>	IF-EU-320a.1	1) Total recordable incident rate (2) Fatality rate (3) Near miss frequency rate	Occupational Health and Safety	47
<b>Grid Resiliency</b>	SASB IF-EU-550a.1	Number of incidents of non-compliance with physical and/or cybersecurity standards or regulations	Business Continuity	69

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**TERNA ENERGY S.A.**  
85, Mesogeion Ave., Athens, 11526, Greece  
info@terna-energy.com  
+30 210 6968000

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