

Collaboration with Local Communities and Social Contribution

Report Profile

Sustainable
Development
Goals in
our operation

GRI Content Index

Message from the CEO

Dear stakeholders,

The past year focused on the full operation of the Kentriki Odos motorway with the completion of the E65 and the upgrading works of the A.TH.E. motorway from Metamorfosi in Attica to Scarfia. The 4th Kentriki Odos Corporate Responsibility Report coincides with the achievement of this major goal, which is particularly rewarding not only because this project is of particular developmental and economic importance for the country and the region, but also because it is inextricably linked to the well-being of local communities.

In this context, this year's Report is, on the one hand, a starting point for setting new targets and, on the other hand, a sign of our commitment to the key pillars of our strategy, which include: continuous improvement of road safety conditions, provision of high quality services, empowering employees, contributing to



environmental protection and constant cooperation with local communities. These five pillars reflect our philosophy of responsibility, empathy and progress that characterizes us, with the only acceptable outome being to improve our social, economic and environmental business impact.

At the same time, recognizing that the 17 UN Sustainable Development Goals pose a great responsibility for all of us at a personal and corporate level, this Report gives us the opportunity to communicate our approach and the results of our actions, but above all to define our future goals and structure our business planning which focuses on:

a) leveraging technologies through innovative initiatives.

Public works and transport can and should play a leading role in the fight against climate change, in the fight for social welfare and national development. That is why we are committed to developing and leveraging technologies to reduce the environmental impact of our operations, as well as to move forward with the use, development and delivery of innovative low energy footprint services. We are also committed to empowering local communities and local development that leads to national prosperity.

b) upgrading and modernizing all of our operating processes.

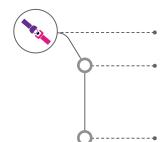
In this publication, we highlight the way we work in order to contribute to creating a better future for everyone and we present the Sustainable Development Goals and how they are integrated into our operation and strategic model, as well as how they relate to our corporate goals. At the same time, we adopt new business practices for the joint management of social, environmental and management issues.

c) initiatives to strengthen our corporate culture and strengthen our human resources. At the same time, in this new era for the company, maintaining a good work environment is a top priority and we are thus committed to incessantly working and adopting sustainable development standards and tools to instil common values, to enhance our people's opportunities and talents, and to create growth opportunities. Our people are our driving force, and the responsibility we have towards them is enormous.

Our journey to date demonstrates our commitment to people-centred principles which promote ethical entrepreneurship, foster innovation, enhance long-term partnerships and strategic initiatives for sustainable development, but most importantly allow us to continue the fruitful dialogue we have initiated some years now with you, our stakeholders, companions and fellow travellers.

Stelios Pentheroudakis, Managing Director





Road Safety

Primary Sustainable Development Goals



3. GOOD HEALTH AND



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES AND COMMUNITIES

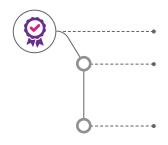
Secondary Sustainable Development Goals



- 29,006 manhours invested in road infrastructure inspections
- 22,977 manhours in snow removals
- 11,438 answered calls in the Emergency Call Centre

Manhours for Road Maintenance

2018 2017 2016 99,524 43,281 21,094



Quality in Services

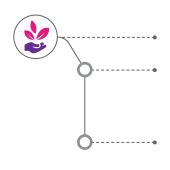
Primary Sustainable Development Goals



Secondary Sustainable Development Goals



- 6,355 calls serviced from the Customer Care Call Centre
- 14 parking areas and 2 Motorist Service Stations along the motorway
- 370 local and national suppliers we work with
- 131% increase of our investment towards local suppliers



Caring for the Environment

Primary Sustainable Development Goals





Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



S. CLEAN WATER AND



7. AFFORDABLE AND CLEAN ENERGY



11. SUSTAINABLE CITIES AND COMMUNITIES

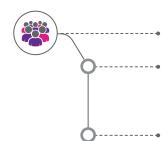


15. LIFE ON LAND



17. PARTNERSHIPS FOR THE GOALS

- €191,938 invested in projects for environmental protection
- Extensive restructuring of the motorway recycling system
- Installation of a new air pollution measuring station
- · Zero noise levels exceedances



Human Resources

Primary Sustainable Development Goals



Secondary Sustainable Development Goals





5. GENDER EQUALITY



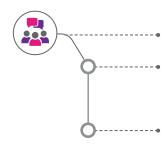




- 201 employees
- 68 new hires during 2018
- 794 hours in Health & Safety training

Evolution of employee numbers

2018	2017	2016	2015
201	147	119	127



Cooperation with Local Communities and Social Contribution

Primary Sustainable Development Goals



Secondary Sustainable Development Goals











11. SUSTAINABLE CITIES AND COMMUNITIES

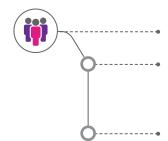


16. PEACE, JUSTICE AND STRONG INSTITUTIONS

- Invested over €117,510 on social initiatives and strategies
- 40,154 free passes for special needs vehicles

Social Product

2018 2017 2016 €26.3 million €22.3 million €19.5 million



Organisation and Management

Primary Sustainable Development Goals





17. PARTNERSHIPS FOR THE GOALS

ZERO incidents

- of non-compliance with user safety legislation
- of non-compliance with motorway signage
- of non-compliance with responsible communication principles
- of corruption

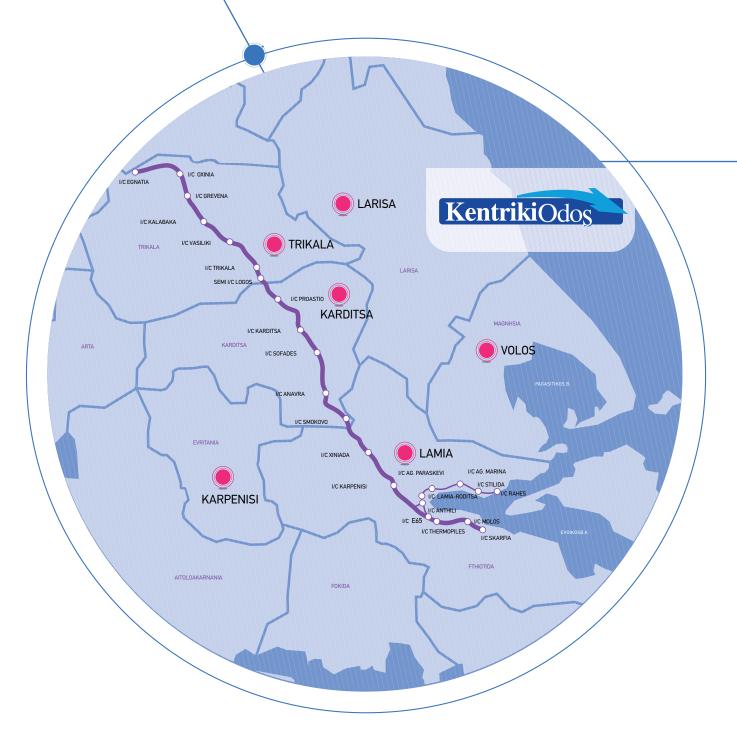
Distinction at the Hellenic Responsible Business Awards Presence in scientific and professional conferences

Mission

We offer highest levels of safety, together with top quality services. We pursue excellence in the operation and maintenance of our motorways. We recognize the absolute need to protect the environment; we take care of our people and we contribute to the country's sustainable development.

Vision

We are determined to change the map of Greece and to become a model for our industry. We create value for the country, our local communities and shareholders, a primary means being our people's commitment, expertise and knowledge.





Our values

Efficiency and effectiveness:

- We work daily toward a goal of development, balancing risks with opportunities.
- We strive for innovation and the continuous improvement of our performance.
- We optimize the use of our resources, providing value to shareholders and stakeholders.

Responsibility

- We work in the interest of public well-being and environmental protection.
- We are fully committed to meeting our responsibilities towards our customers.
- We encourage our people to take on responsibilities to further our organization's success.

The strength of our people:

- We acknowledge effort, recognize talents and support their development.
- We operate as a team, united with common goals.
- We appreciate different viewpoints and support constructive arguments as a means of effective cooperation.
- We respect, care about and support our team members.

Integrity:

- We focus on building and maintaining bonds of trust with our customers and partners.
- We encourage sincere cooperation and communication with all our partners.
- We operate in a fair and transparent way, with a focus on business ethics.

The Kentriki Odos Motorway (Kentriki Odos) has undertaken the study, design, construction, operation, exploitation and maintenance of the "Aftokinitodromos Kentrikis Ellados – E65" Concession project. Following an international tender, Kentriki Odos undertook the implementation of one of the most substantial projects of modern Greece in mid-2007, which decisively contributes to the development of the country.

Kentriki Odos is responsible either directly or through its partners for:

- The study carrying out all necessary studies (environmental, road construction, geotechnical, etc.)
- The design and construction of all new sections of the motorway
- The operation traffic control and monitoring, emergency management, routine operations (for instance, road cleaning)
- The maintenance of buildings, of the road, of the relevant equipment, of vehicles
- The management of toll collection and management of Motorists Service Stations (M.S.



1.2 An Ambitious Project

The construction completion of the E65 motorway is a project with particular strategic importance for the development of Greece as a whole and for the Region of Central Greece in particular, since its construction results in the substantial connection between Eastern and Western Greece. Its completion makes it possible for Central Greece to connect with trans-European networks, and with the ports of Igoumenitsa and of Volos and it completes the transport system at a regional and local level.

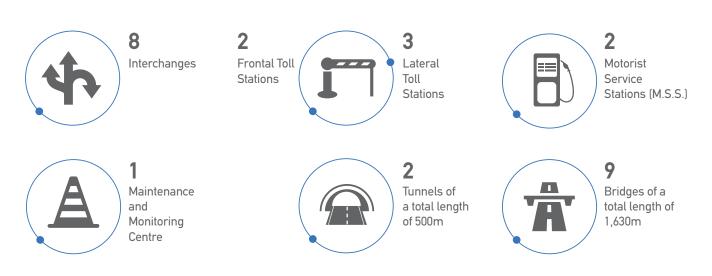
The benefits stemming from the project are multiple, including:

- Improved safety and minimized risks
- Drastically minimized the required travel time
- High-level customer services
- Increased environmental protection
- Significant development prospects and employment opportunities

A.TH.E. (Skarfia-Raches Section)



E65 (Xyniada-Trikala Section)

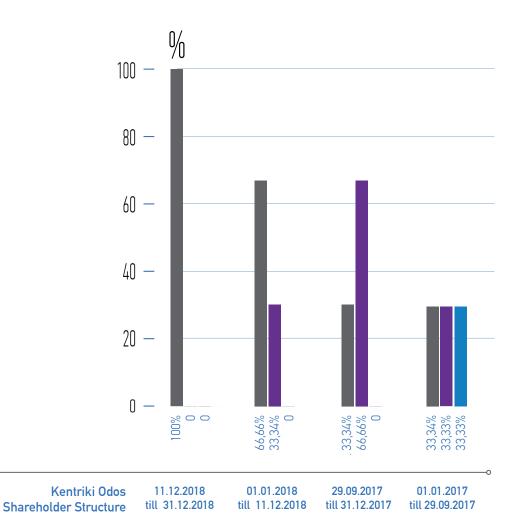


13 GRI 102-2

1.3 Shareholder Structure

In 2018 the shareholder structure of Kentriki Odos changed. More specifically, on December 11th, 2018, FERROVIAL S.A. exited the company shareholding, by transferring to GEK TERNA HOLDING REAL ESTATE CONSTRUCTION S.A. (GEK

TERNA SA) the totality of its shares, that is 21,671,001 registered shares. GEK TERNA SA is now the main shareholder of the company.



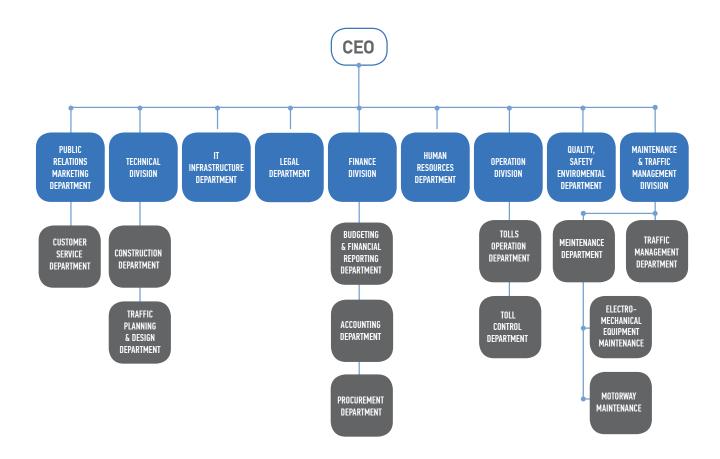
GRI 102-5, GRI 102-10, GRI 102-15, GRI 102-18, GRI 103-2

GEK TERNA S.A.

FERROVIAL S.A. DRAGADOS S.A.

1.4 Organisation Chart

The Kentriki Odos organisation chart depicts the way the company plans and implements its activities and its adequacy regarding addressing its strategic plans, duties and commitments.





1.5 Economic Performance

The Financial Statements for the fiscal year that ended on December 31st, 2017 are the second being prepared by the company in accordance with the International Financial Reporting Standards (IFRS) due to the acquisition of control by the parent company, that is GEK TERNA SA. All the published financial data of the company is presented in the 2018 Annual Financial Statement.

Financial Information (in th. €)	2018 IFRS	2017 IFRS	2016 IFRS
Net Sales	27,278.02	88,067.65	144,497.32
Other operating income	411.39	767.43	3,863.48
Revenue from financial investments	7,089.75	49,092.12	18,572.26
Total income	34,779.16	137,927.20	166,933.06
Operating cost	38,052.32	77,017.24	127,120.69
Employee salaries and benefits	3,892.14	2,027.80	2,030.74
Payments to providers of capital (Including payments to shareholders amounting to €2.8 million)	12,621.27	11,108.92	11,483.23
Net profit / (loss) before taxes	-24,445.95	40,401.95	16,388.72
Net profit / (loss) after taxes	-4,006.09	28,540.38	11,616.1
Total payments to state bodies (taxes paid)	13,739.65	11,668.04	5,170.86
Company investments	5,367.36	79,147.47	119,075.23
Total capitalisation	644,810.72	689,634.50	656,520.30
Equity	113,999.92	121,629.87	78,792.03
Total liabilities	561,962.17	626,118.67	635,395.98
Total assets (in million €)	675,962.10	747,748.54	714,188.01



Net Sales(in th. €) (31/12)	2018	2017	2016
Exploitation segment of Central Greece Motorway	18,264.81	16,845.75	21,531.61
Construction of Central Greece Motorway	2,021.42	71,221.90	123,962.36
Total	20,286.23	88,067.65	145,493.97

•	}	2018	C	2017	2016
Total vehicle entries and Electronic Toll Collection system (ETC)	Total Kentriki Odos	A.TH.E.	E65	Total Kentriki Odos	Total Kentriki Odos
Total vehicle entries	9,244,228	7,890,979	1,353,249	7,513,810	7,188,354
Number of non-exempted electronic transactions performed in Kentriki Odos' Toll Stations (ETC)	1,522,301	1,376,779	145,522	1,171,262	915,888
Percentage	16.47%	17.45%	10.75%	15.6%	12.7%

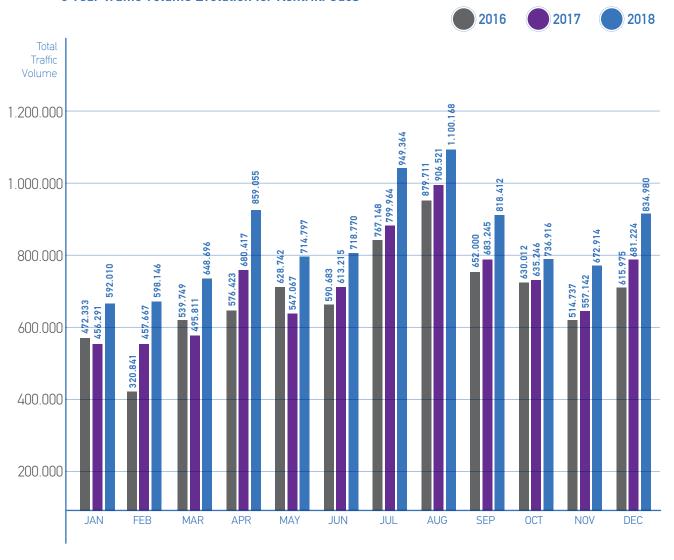
Total passages







3 Year Traffic Volume Evolution for Kentriki Odos



Entries by	Vehicle Category 2018	Total
Category 1	6	56,012
Category 2		7,305,167
Category 3		712,788
Category 4		1,170,261

The creation of modern highways is the ultimate goal of our strategic planning. The construction of motorways that meet European standards stimulates the national economy, guarantees environmental protection and significantly improves the quality of life in society in general.

1.6 Corporate Governance

Our Corporate Governance policy is based on transparency, integrity, credibility and ethics in our taking day-to-day decisions, as well as with ensuring the interests of shareholders and all those associated with the operation of the company. The continuous optimization of our organizational structure enables us to remain flexible and effectively respond to contemporary social challenges and the expectations of our internal and external stakeholders.

The Board of Directors of Kentriki Odos for 2018, is now composed of the following members:

- 1. Emmanouil Vrailas CEO (non-executive member)
 - 2. Emmanouil Moustakas Vice Chairman (non-executive member)
 - 3. Stylianos Pentheroudakis Member (executive member)
 - 4. Sofia Dimitrakopoulou Member (non-executive member)
 - 5. Alexandros Iosif Aligizakis Member (non-executive member)
 - 6. Vasileios Delikaterinis Member (non-executive member)
 - 7. Christos Zaribas Member (non-executive member)
 - 8. Andromachi Pasallidou Member (non-executive member)
 - 9. Alexandros Karyotakis Member (non-executive Member)
 - 10. Pinelopi Lazaridou Member (non-executive Member)

Following the changes in the Company's shareholding in 2018, changes were made to the Board of Directors. The Board of Directors consists of members of Greek ancestry.

| Women Me | n | | | |
|----------|---------|-----|-------|-----|
| | Members | <30 | 30-50 | 50+ |
| 7 | 3 | 0 | 1 | 2 |
| | 7 | 0 | 3 | 4 |
| Total | 10 | 0 | 4 | 6 |

The Board of Directors decides upon any matter relating to the management of the company and its proper functioning. The Board of Directors members must meet eligibility criteria, such as having a thorough knowledge of corporate issues and having relevant business experience, excellent understanding and strategic thinking. The Board of Directors as a key management body has as its primary concern the

implementation of the corporate strategy and ensuring a fair and equitable working environment for all, regardless of position, duties and responsibilities. The Board of Directors manages corporate affairs based on the principles and values of the company in an ethical, non-discriminatory and socially acceptable manner.

1.7 The Value of Compliance

Our business ethics is formed, on the one hand, through our thorough compliance with the Greek and European legislation on issues pertaining to our industry, and on the other, through the commitments stemming from our corporate values, ethical principles and social expectations.

The systematic approach we implement and the excellent cooperation amongst departments allow us to respond with success and efficiency to the legal and institutional obligations of our industry so much so that in 2018 no environment degradation issues due to the operation and maintenance of the motorway were recorded and no financial penalty nor any other sanction for violating the current environmental legislation was imposed. Moreover, no incident of non-compliance with the legislation or the regulations as regards user safety was recorded. No corruption incident was recorded, nor was there any termination of any cooperation agreement due to a corruption-related offense. Finally, no incident of non-compliance with applicable regulations in the areas of communication, marketing, advertising and sponsorships was recorded.

1.8 International Standards and Certifications

Kentriki Odos is committed to providing high quality driver services, a safe work environment for employees and to protecting natural resources for the local communities, thus requiring all of our activities and work to be regulated by certified processes. In this context, we implement an integrated management system that is supported and regulated by international operating standards certified by external bodies.

International certification standards applied by the company:





Hellenic Responsible Business Awards 2018: "Long-Term Local/Regional Investment"

Kentriki Odos earned the Bronze Award in the "Long-term Local / Regional Investment" category for the "Cycling Safely" action that it implements in collaboration with the "Panos Mylonas" Hellenic Road Safety Institute.

"Cycling Safely" contributes to shaping the road culture and behaviour of children as future drivers and aims at children adopting a responsible driving behaviour that will guide them in their future driving trips as adults. After being approved by the Greek Ministry of Education and the Institute for Educational Policy, it has been implemented with the cooperation of the competent Departments of Primary Education.

Fully compatible with the Kentriki Odos strategic priority of promoting road safety, "Cycling Safely" took place at more than 10 primary schools in 3 districts (Boeotia, Karditsa and Trikala) and trained nearly 600 students in basic road safety and the safe use of their first means of transport, the bicycle.



2.1 Participation in Bodies, Partnerships and Initiatives

Hellastron

Kentriki Odos is a member of the organization "HELLENIC ASSOCIATION of TOLL ROAD NETWORK" with the distinctive title "HELLASTRON" that was founded in late 2014 and is the national member of the European body ASECAP (European Association of Operators of Toll Road Infrastructures), which includes European motorways operators.

Hellenic Institute for Customer Service

The Hellenic Institute for Customer Service is a Non–Profit Organisation, founded in 2004, with the support of 37 multinational and leading Greek companies and scientific bodies operating in Greece. Kentriki Odos is a member at the Hellenic Institute for Customer Service and actively contributes at upgrading and continuously improving the services that customers, citizens and people receive.

"Panos Mylonas" Road Safety Institute

"Panos Mylonas" Road Safety Institute has a vision of "a world without road accidents" and hence undertakes the task of informing citizens regarding road accidents and its prevention. It is a Non- Profit Organization that collaborates with Kentriki Odos in the framework of the public awareness and education actions Kentriki Odos undertakes. As a member of the Road Safety Institute, the company takes part in the annual general assembly of the organization. The Hellenic Road Safety Institute has been certified in accordance with the following standards: ISO 9001:2008 for quality, ISO14001:2004 for health and safety, ISO 39001:2012 for road safety and ISO 29990:2010 for quality in training services.

The public awareness and education initiatives that Kentriki Odos undertakes are in collaboration with "Panos Mylonas" Road Safety Institute. As a member of the Road Safety Institute, we take part in planning and implementing actions that are targeted to the prevention and reduction of road accidents.

Diazoma

Kentriki Odos is an active corporate member of "Diazoma" Association. Diazoma aims at preserving ancient theatres and protecting Greece's cultural heritage. It was founded on the initiative of the former Minister of Culture, Mr. Stavros Benos, and the decisive participation of the archaeological community, the artists and intellectuals of the country, and local communities.

Interamerican

Kentriki Odos added a new cooperation project with Interamerican related to offering road assistance to motorway users. The agreement concerns covering the needs of towing and removing vehicles, due to a damage or a road accident, that are on the motorway from the section of Skarfia to Raches in Fthiotida and this service will be offered free of charge.

Presentations at Conferences

Our most significant presentations in conferences during the reference year have been the following:



During the two-day workshop on Intelligent Transport Systems and developments in Greece, a presentation on "Sophisticated systems and applications for the management of the NEA ODOS and KENTRIKI ODOS Greek motorways" was delivered by Mr. Ioannis Sioutis

Associations and Organizations that Kentriki Odos is a member

| | Holds a place in
the governing
body | Participates
in projects or
committees | Provides significant funding beyond the regular subscription | Considers its involvement as a strategic priority |
|---|---|--|--|---|
| HELLASTRON | ✓ | √ | ✓ | ✓ |
| Hellenic Institute for Customer Service | √ | | | √ |
| "Panos Mylonas" Road Safety Institute | ✓ | √ | √ | √ |
| Diazoma | ✓ | ✓ | √ | √ |

| Connection to | | 201 | 2019 | |
|--|--|--|------------------------------------|--|
| the Sustainable Development Goals | Topic | Goal | Progress | Goal |
| 17. PARTMERSHIPS
FOR THE GOALS | Participation in Global
Initiatives | Adopt the Sustainable
Development Goals | Incorporated in corporate strategy | Incorporate in corporate initiatives |
| 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Reinforcement of internal structures | Development of Code
of Conduct | Moved to 2019 | Adopt the Code of
Conduct of GEK
TERNA GROUP |
| 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Annual Recertification | Annual Recertification:
ISO 9001:2015 | Completed | Annual
Recertification |



3 CORPORATE RESPONSIBILITY 3.1 Our Approach

We recognize that the motorways are a public good that we are called upon to manage, and we are fully aware of our responsibility towards society.

Corporate Responsibility is an important element of our governance and reflects the philosophy, mission and our corporate values. Corporate Responsibility as implemented by Kentriki Odos follows internationally recognized practices and is based on five pillars:

- Road Safety: Continuous reduction of road accidents
- Quality of Rendered Services: To be the best possible travel companion
- Human Resources: To provide the best possible work environment
- **Environment:** Contribution to the protection of the environment
- Cooperation with the Local Communities Social Contribution: Support and development of the neighbouring local communities

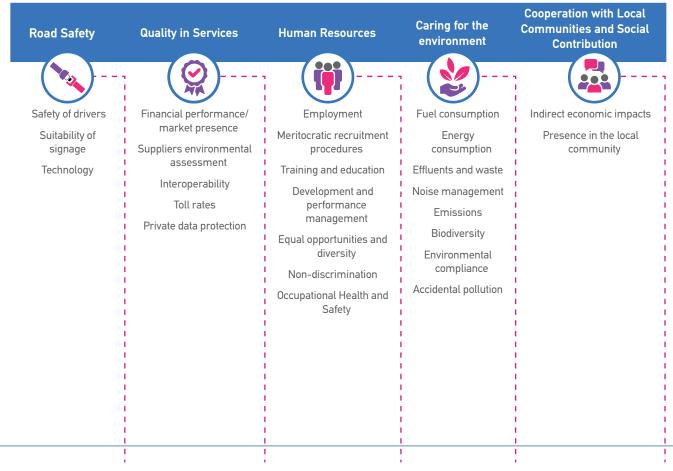
Corporate Responsibility Pillars

Our Values

Efficiency and effectiveness, Responsibility, The strength of our people, Integrity

Corporate Governance

Zero corruption and transparency, Ethical governance



3.2 Handling Corporate Responsibility Issues

The management of the issues pertaining to our Corporate Responsibility requires a systematic approach, and support from the Management Team and the active participation of all departments of the company.

In this context, a Corporate Responsibility Team has been set up, which consists of specialized executives from all the company's main departments so that they manage Corporate Responsibility issues that the company has identified.

The responsibilities of the Team include:

- 1 the collection of data required for the annual Corporate Responsibility Report
- the quality and reliability of data and information collected
- the development of Corporate Responsibility policies and procedures
- the briefing of employees about new policies and procedures and the implementation of initiatives that enhance Corporate Responsibility culture

The Public Relations & Marketing Division is responsible for coordinating and managing Corporate Responsibility issues and:

- informs top management at regular intervals
- recommends the necessary procedures for managing Corporate Responsibility actions and initiatives
- proposes and implements the strategic direction of the company
- coordinates and is the leader in preparing the Annual Corporate Responsibility Report



3.3 Stakeholders

Mapping and Analysis

In 2018, we considered it necessary to repeat the mapping and identifying process of the expectations of our Stakeholders in order to investigate the extent to which our existing actions and initiatives meet their needs and expectations and strengthen our relationships with them.

Emphasizing how we categorize and interact with our stakeholders, such as how we respond to issues of mutual local or national interest, we assessed the key modes of dialogue with them, as well as key issues of interest, as they are listed in the following table

| Direct
stakeholders | Expectations/Main issues | Communication
Mechanisms | Communication frequency | Communication Outcomes |
|------------------------|---|---|-------------------------------------|---|
| Employees | Regular communication between employees and management Informing employees about organizational changes and anything related to the company Emphasis on Health and Safety issues Rewards, additional benefits and remuneration system Respect, equality and meritocracy Training, evaluation and development opportunities Respect for personal and family life Retain a positive company profile | Meetings between staff and management representatives Email correspondence Newsletters HR Department Open door policy Personal communication Commitment and satisfaction survey Corporate Responsibility Report | Continuous
communication | Improvement of employees' development process through the establishment of Development Centres Initiatives for the improvement of the working environment, boosted confidence amongst employees and enhanced a sense of active participation Strengthened staff commitment Better dissemination of information, understanding the purpose of change The company is recognized as a fair employer Increased efficiency Reduction of leaves |
| Motorway Drivers | Safe and fast travel Infrastructure quality, quality of service, satisfaction and reliability Immediate response to incidents Immediate response to requests or complaints Immediate dissemination of information Private data protection Interoperability Upgrade commercial policy and rewards for frequent users New and innovative payment methods Toll rates, discount policy | Customer service department Customer satisfaction surveys Complaint handling department Awareness campaigns Company website Emergency number Variable Message Signs (VMS) Press Releases Toll staff Media Corporate Responsibility Report Email / contact forms RSS | Daily | Road network interventions and infrastructure improvement initiatives Improvement of signage Good publicity and reputation Extended social consensus with the company's objectives Enhanced sense of safety Discount programs Better understanding of future issues that may arise including possible increase of fares Understanding the role of the company Satisfaction with the provided services Ideas and suggestions |
| Local
Communities | Stimulate the local economy, create jobs and develop the wider region Indirect positive financial effects Improve standard of living Recruitment from local communities Sponsorships - charity actions and social investments Respect and protection of local environmental wealth Retain high level of service | Meetings with representatives
of local communities
Consultation with local
associations and bodies of
residents
Local media | On regular time
intervals/ Daily | More targeted support for the local economy Smooth cohabitation Increased local business revenue Attractive working environment Enhanced Kentriki Odos' image as an employer |
| Local Government | Comprehensive information regarding impacts from the company's operation on a local level Accountability and taking measures where necessary Strengthen local bodies and local government initiatives | Direct communication with administrative structures at local level | Regular | Collaboration for voluntary actions |
| Shareholders | Financial performance, efficiency, dividend distribution Regular and correct information/reporting Effective governance mechanisms Leadership in the industry and positive reputation Provide high quality services and develop innovations Develop partnerships | Board of Directors meetings
and General Assemblies
Regular reporting
Company website
Balance Sheets and Financial
Statements
Corporate Responsibility
Report
Correspondence and business
meetings | Regular | Detailed recording of the environmental
and social impacts of the company and
their disclosure through the Corporate
Responsibility Report
Adopted new practices, better resource
management and improved crisis
response |
| NG0s | Support NGOs goals
Economic support
Public awareness | Company website Department of Public Relations Corporate Responsibility Report | Regular | Developed joint awareness campaigns
Strengthened the social profile of the
company
Business operation linked with social
causes |

| Direct
stakeholders | Expectations/Main issues | Communication
Mechanisms | Communication frequency | Communication Outcomes |
|---|--|--|-------------------------------------|--|
| Activists | Reduction of toll rates which are not subject to corporate decisions | According to company policies | When deemed necessary | Interventions where possible to ensure smooth driver service |
| Ministries and
Structures
of Public
Administration | Good operation of the motorway Fully inform the supervisory authority on matters relating to the operation of the infrastructure. Compliance with the contractual obligations set out in the Concession Agreement Environmental performance Optimal management of road safety and zero accidents Extension of contracts / additional works Create new jobs Effective communication and cooperation | Correspondence, phone communication and work meetings Workshops / Representative meetings Official reports Visits, inspections Corporate Responsibility Report | On regular time
intervals/ Daily | Fulfilment of the obligations arising from the Concession Agreement Improved management and operation practices, risk prevention and crisis management Maintaining good relations |
| Emergency
Services | Compliance with laws Support to Emergency Services work (Traffic Police, Ambulances, Fire Department, Civil Protection etc.) Effective communication and cooperation Technical equipment | Scheduled and unscheduled
meetings with Emergency
Services representatives
Correspondence, phone
communication and work
meetings | Daily | Intensification of readiness exercises Effective incident / crisis management Smooth cooperation Excellent traffic conditions 24 hours a day, 365 days a year |
| Financial
Institutions | Comprehensive information on company performance Financial effectiveness Consistency in its financial obligations and timely payment of interest and loans Compliance with legislative framework, contractual obligations, fair governance and financial audits Risk management and company growth prospects Budget keeping Access to information Positive publicity for a funded project | Correspondence, phone communication and work meetings 3 and 6-month reports Official reports Corporate Responsibility Report | Regular | Full compliance with the law Analysis of social and environmental risks Project financing / disbursement Payment of suppliers Positive publicity Timely resolution of issues |
| Partners,
Suppliers and
Subcontractors | Transparency in procurements and in governance mechanisms Meritocracy in selecting suppliers and partners Compliance with agreed partnership terms Effective communication Responsible supplies Flexibility and availability Experience | Procurement department Ongoing communication with partners in the implementation of projects Correspondence, phone communication and work meetings | On regular time
intervals/ Daily | Keeping terms and deadlines Application of supplies' manuals Immediate response to requests Improved relationships, quality and cooperation |
| Indirect
Stakeholders | Expectations/Main issues | Communication
Mechanisms | Communication frequency | Communication Outcomes |
| Agencies,
Associations,
Academic
Community | Exchange of knowledge on issues of industry expertise | Participation in conferences and seminars | Regular | Re-evaluation and upgrade of practices |
| Media | Clear strategies and structured relationships with journalists and the Media Continuous updates and exclusive tributes Advertising budget | Department of Public
Relations / Marketing
Correspondence, phone
communication Interviews /
interventions
Online press releases
Personal communication
Social media and video-
sharing platforms | On regular time
intervals/ Daily | Communicate company's activities to
the general public
Positive publicity
Fair distribution of advertising budget
Zero news leaks
Continuous updates |
| Other Motorways | Optimal coordination in interchange areas Collaborate, share knowledge and tackle industry's issues Adopt best practices for managing, risks and opportunities Interoperability Healthy competition Promote industry issues | Mail correspondence
Contact via phone
HELLASTRON meetings | Regular | Completion of actions related to the operation of motorways Adopt common practices and exchange of know-how and information Effective management of road safety issues with emphasis on prevention |

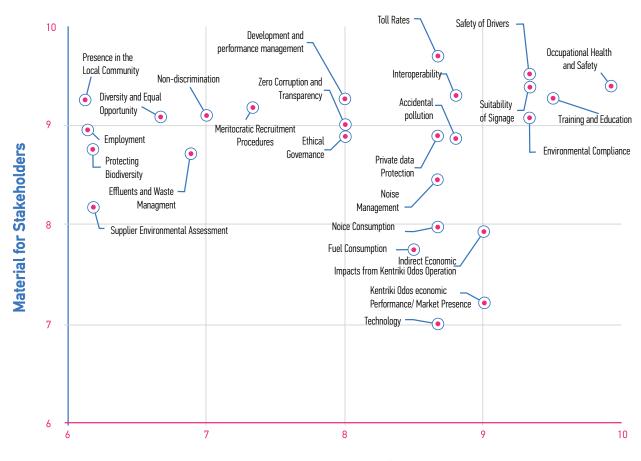
3.4 Material Aspects

Implementing the process of identifying material aspects, we redefined the mutual interest issues with our stakeholders. These issues have a substantial impact on our social and environmental footprint and the value we create with our operation.

The relevant process according to the GRI content identification principles, was implemented by representatives of all departments and sections who followed three main steps:

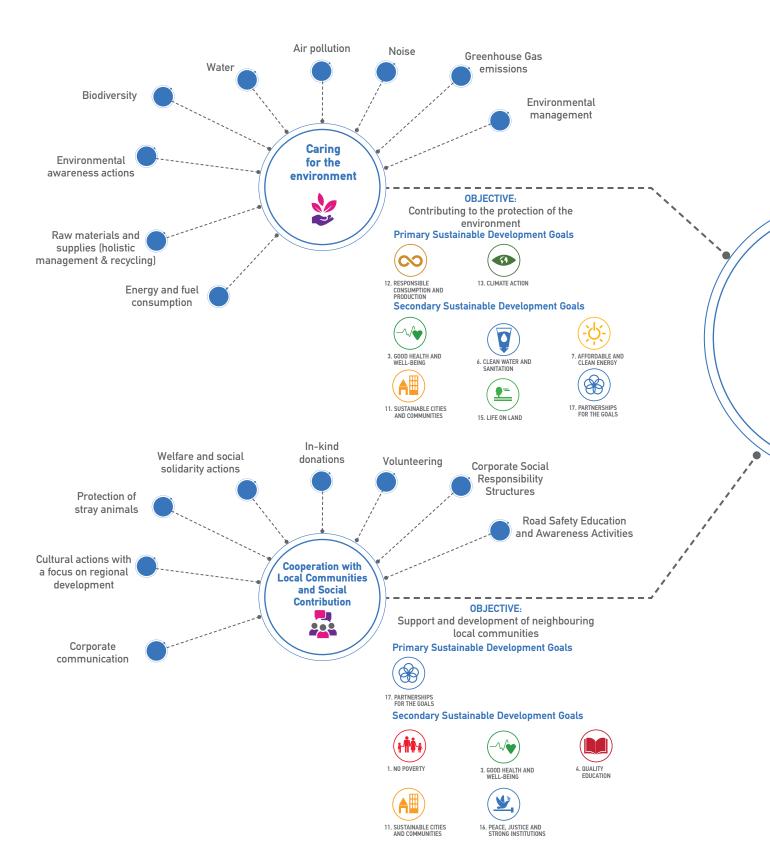
- identifying material aspects and issues based on their impact on the company's business operations, defining their boundaries,
- an assessment based on the importance of their impact both on the company and their impact on the evaluations and decisions of the stakeholders, and
- validation as to their completeness so that the content of the Report reflects the company's significant economic, environmental and social impacts and allows stakeholders to reach conclusions regarding the company's performance during the reporting period

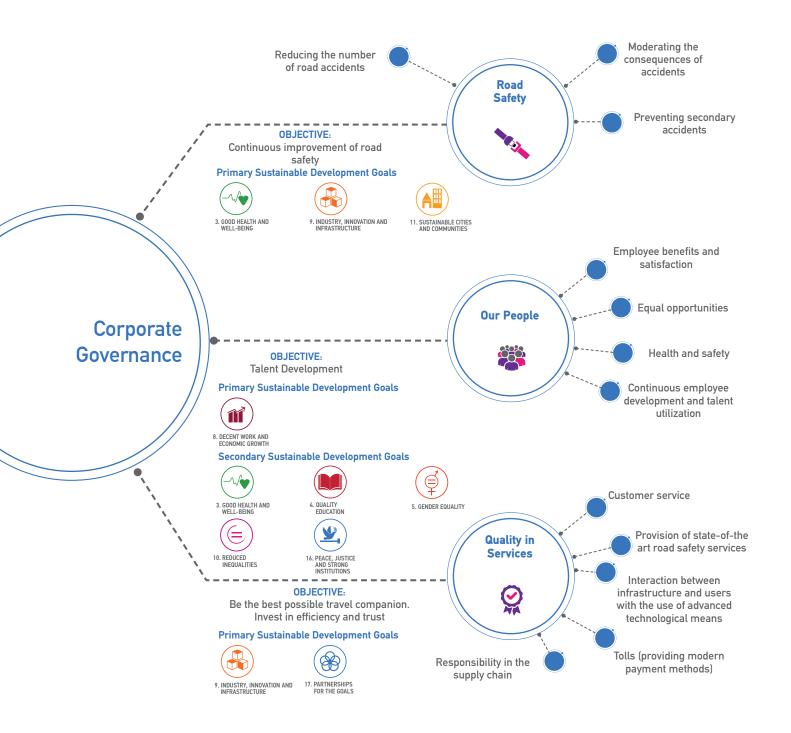
The result of this process was to validate as the most important the 27 aspects presented in the table of Materiality, while identifying the core content of the 2018 Corporate Responsibility Report.



Material for Kentriki Odos

| Corporate
terial topics | | | | D | irect S | take | holo | lers | | | | | ndirec
ceholo | | mat | ndary
of
erial
oics | |
|---|-----------|------------------|-------------------------|--------------|--|--------------------|------------------------|---|-------|--------------------|-------------------|---|------------------|-----------------|----------------------|------------------------------|----------------------------------|
| Kentriki Odos Corporate
Responsibility Material topics | Employees | Motorway Drivers | Local Government Bodies | Shareholders | Ministries and Public
Administration Structures | Emergency services | Financial Institutions | Partners, Suppliers and
Subcontractors | NGOs | Activists/ Lobbies | Local Communities | Institutions, Associations,
University Community | Media | Other Motorways | Inside Kentriki Odos | Outside Kentriki Odos | SDGs |
| | | | | | | | CORP | DRATE GO | VERN | ANCE | | | | | | | |
| Zero corruption and transparency | • | - | • | • | - | - | • | • | • | - | | ١. | • | • | • | • | Primary |
| Ethical governance | | | | | - | | • | | | - | | - | | | • | • | 16, 17 |
| | | | | | | | | ROAD SA | FETY | | | | | | | | |
| Safety of drivers | • | - | • | | | - | • | | | - | • | - | | | • | | Primary |
| Suitability of signage | • | • | | | - | - | | | | - | • | • | | | • | | 3, 9, 11
Secondary |
| Technology | • | • | | | | • | • | | | | | • | • | | • | • | 17 |
| | | | | | | | QUA | ALITY IN S | ERVIC | ES | | | | | | | |
| Financial performance/ market presence | - | | - | - | | | - | • | - | - | - | | - | - | • | | |
| Suppliers environmental assessment | • | | | • | | | | • | | | | | | • | • | | Primary |
| Interoperability | | • | | | • | | • | | | | | | | | • | • | 9, 17 |
| Toll rates | | | | | - | | | | | | | | • | | • | • | , |
| Private data protection | - | | | | - | | | | | | | - | • | | • | • | |
| | | | | | | | HU | MAN RES | OURC | ES | | | | | | | |
| Employment | | • | | • | - | | • | | | - | • | | | | • | | |
| Meritocratic recruitment procedures | • | • | | | • | | | | | | • | | | • | • | | |
| Training and education | • | • | • | | | • | | | | | | - | | • | • | | Primary |
| Development and performance management | - | • | | - | | | | | | | | • | | - | • | | 8
Secondary |
| Equal opportunities and diversity | - | • | | • | • | | | | • | • | • | | | | • | | 3, 4, 5, 10, 16 |
| Non-discrimination | • | • | | | • | | | | | • | | | | | • | | |
| Occupational Health and Safety | | | | • | • | • | | | | - | | <u> </u> | | | • | | |
| | | | | | | | | ENVIRON | MENT | | | | | | | | |
| Fuel consumption | | • | | | - | | • | • | | | | | • | | • | | |
| Energy consumption | • | - | • | • | - | | • | • | | • | | - | • | | • | | |
| Effluents and waste | | | | | - | | | | | | | - | • | | • | • | Primary |
| Noise management | • | • | | • | • | | | | | | | • | • | | • | | 12, 13 |
| Emissions | | • | | | - | • | | | | • | • | | • | | • | | Secondary
3, 6, 7, 11, 15, 17 |
| Biodiversity | | - | | | - | | | | | | • | | • | | • | | _, _, .,, 10, 17 |
| Environmental compliance | | | | | - | • | | | | | | | - | • | • | • | |
| Accidental pollution | | | | | • | | | | | | | | - | | • | • | |
| | | | | | | | | SOCIE | ΤΥ | | | | | | | | |
| Indirect economic impacts | - | - | - | | - | | - | | | - | • | • | • | | • | • | Primary
17 |
| Presence in the local community | | | | | • | | | • | | | - | | - | | • | • | Secondary
1, 3, 4, 11, 16 |





33 GRI 102-46, GRI 103-1

Global Reporting Initiative (GRI)

Since our very first Annual Report for the 2015 fiscal year, we have been following international initiatives and best practices to reflect our strategy, priorities and practices. We believe that communication of our approach is an integral part of our responsibility towards our social partners. The GRI Standards, that we commenced using in the 2016 Report, enables us to report and communicate our corporate approach as regards Sustainability in a credible, and structured manner, and to ensure continuity as to the manner we monitor our data with.

Sustainable Development Goals (SDGs)

The 17 UN Sustainable Development Goals (SDGs) are a driving force for moving to new business models to address the biggest and most pressing economic, social and environmental challenges of humanity. For Kentriki Odos, they are an important reference framework for determining our priorities and recognizing the degree of impact of these issues on our operations and business activities.



Starting already in 2016, the company had begun the process of identifying and recording those goals that are directly and indirectly related to its operation and are an integral part of its business strategy. In the 2018 Report, we integrate the SDG targets into our operation and link them to our corporate goals.

| Connection to | Ĭ | 20 | 18 | 2019 |
|--|--|---|-------------------------------|---|
| the Sustainable Development Goals | Topic | Goal | Progress | Goal |
| 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Stakeholder | Implementation of users' recommendations as captured in the motorway user survey on Corporate Responsibility | Repeat user
survey in 2019 | Implementation
of users'
recommendations
Repeat user survey
in 2019 |
| | Engagement | Development of online scorecard to improve communication and access to corporate information for stakeholders | New | Complete Scorecard |
| 4. QUALITY EDUCATION | Employee training on
Corporate responsibility | Employee training
on CSR and
Sustainability as part
of the material topics
review process | Completed | |
| | and Sustainability | Seek and incorporate
employee input in
the revised material
topics | Completed | |



Primary Sustainable Development Goals







9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES AND COMMUNITIES

In 2018, Kentriki Odos dedicated:

99,524 hours to road maintenance

29,006 hours to road infrastructure inspections

22,977 hours to snow removal

60 major technical projects were inspected for their structural adequacy

575 vehicles towed

Secondary Sustainable Development Goals



The development of excellent road safety conditions is one of the Kentriki Odos strategic goals.

We focus on enhancing road safety and we continually strive to protect human life, with key axes being:



2 Reduction of the impact of road accidents

3 Taking measures to prevent secondary accidents



4.1 Caring for Safety before Driving on the Motorway

From the very first stages of the project's design and implementation, we ensure that strict construction specifications are adhered to in order to achieve the highest quality in road infrastructure and road safety. Special attention is always given to geometric design, traffic studies and safety signage studies. We effectively manage challenges related to geotechnical studies and the particular geological conditions of each area, while often exceeding our contractual obligations to deliver safe, and modern highways to the public.

More specifically, we take measures to continuously improve the existing infrastructure that include the following:

- Redesign and construction of intersections
- Improvement of the vertical and horizontal signage
- Replacing safety barriers
- Construction of supplementary projects (sewerage, irrigation, etc.) that may contribute to causing accidents

In particular, we focus on traffic safety and the full compliance with the motorway operating and maintenance conditions, and at the same time we carry out numerous and important actions aiming at informing and raising public awareness in road safety issues.

Moreover, we successfully manage every challenge for the protection of human lives, taking into account at the same time many variables such as the people (drivers, passengers, cyclists, and pedestrians), vehicles, road infrastructure (road surfaces, signage, signalling, lighting, and maintenance), supervision (surveillance, policing, prevention, care, and maintenance), and weather conditions.

The Role of Signage

The role of the signage in maintaining excellent road safety conditions is of significant importance.

We fully comply with the national and European legislation regarding signage issues along the whole length of the Aftokinitodromos Kentrikis Ellados – E65 Motorway, and our relevant studies have been approved by the Independent Engineer (certification number: DAC0596B).

More specifically, traffic signage is categorized as follows:

- Emergency signage: used for immediate intervention in the event of an incident.
- Mobile signage: used during movable works such as sweeping, road surface marking as well as in cases of "mobile events", i.e. escort of a special load.
- Short-term works signage: temporary signage used during short-term works, as well as for important incidents (updating of emergency signage).
- 4 Long-term works signage: temporary signage used during long-term works

4.2 Infrastructure Maintenance

As regards maintenance, we implement an integrated Road Infrastructure Management and Maintenance System, which meets the needs of the motorways that operate 24-hour a day, 365 days per year. This system records the road infrastructure data, forecasts the performance of the road paving and the

effectiveness of our interventions and includes a wide range of preventive and enhancing maintenance program for the totality of the infrastructure. In addition, with the help of specialized staff we conduct systematic and thorough inspections throughout the motorway, and we are ready to respond to emergencies.

Additionally, in order to be able to refer to measurable quantities, to depict in detail and monitor the road safety conditions:

•

We carry out statistical analysis of traffic accident data

We carry out a risk assessment study of various locations in the urban and suburban network of our company and take additional improvement measures,

We systematically monitor the changes in specialized road safety indicators.

| Road Maintenance per Category | Total
Kentriki
Odos | 2018 | E65 | 2017
Total
Kentriki
Odos | 2016
Total
Kentriki
Odos |
|---|---------------------------|-----------|-----------|-----------------------------------|-----------------------------------|
| Road surface | 1,815.50 | 1,125.50 | 690 | 623.5 | 4,725.7 |
| Shoulder, traffic islands, kerbs-gutters and sidewalks | 3,496.02 | 3,176.63 | 319.38 | 2,289 | 1,151.1 |
| Motorway drainage system | 4,491.05 | 3,146.30 | 1,344.75 | 4,405.7 | 1,796 |
| Tunnels, cut and cover, landfills and trenches | 4,478.28 | 4,221.30 | 256.98 | 1,331 | 960.3 |
| Green areas and trees | 17,562.82 | 12,724.72 | 4,838.10 | 18,774.1 | 4,736.1 |
| Motorway safety and protection equipment | 1,007.17 | 698.25 | 308.92 | 393.4 | 1,279.4 |
| Motorway Signage | 2,664.20 | 2,459.20 | 205 | 769 | 1,076.1 |
| Cleanliness | 33,728.10 | 23,517.12 | 10,210.98 | 5,225.5 | 3,905.3 |
| Common and special bridges | 261.58 | 152.58 | 109 | 154.4 | 590.6 |
| Support walls and avalanche retaining walls | 434 | 312.00 | 122 | 195 | 240 |
| Buildings | 4,268.33 | 4,268.33 | - | 4,106.3 | 194 |
| Winter maintenance | 5,721 | 4,321 | 1,400 | 240 | 4 |
| Other (material transportation, tidiness, training, etc.) | 19,595.61 | 18,329.24 | 1,266.38 | 4,774.6 | 435.6 |
| Total | 99,523.66 | 78,452.17 | 21,071.49 | 43,281.5 | 21,094.2 |

| Electromechanical Equipment Maintenance | 2018 | 2017 | |
|--|------|------|--|
| Total maintenance tasks in electromechanical equipment | 117 | 117 | |
| Total maintenance tasks in electromechanical equipment for tunnels | 43 | 43 | |

Roadside barriers

E65





| Categories of Road Infrastructure | Total
Kentriki
Odos | 2018
A.TH.E. | E65 | Z017 Total Kentriki Odos | Z016 Total Kentriki Odos |
|---|---------------------------|-----------------|----------|--------------------------|--------------------------|
| Road surface | 1.661,63 | 1.248,08 | 413,55 | 995,7 | 67,9 |
| Shoulder, traffic islands, kerbs-gutters and sidewalks | 160,57 | 160,05 | 0,52 | 16,7 | - |
| Motorway drainage system | 858,75 | 494,75 | 364 | 708,8 | 81 |
| Tunnels, cut and cover, landfills and trenches | 523 | 484 | 39 | 459 | 60 |
| Green areas and trees | - | - | - | 19 | - |
| Motorway safety and protection equipment | 2.164,92 | 1.146,15 | 1.018,77 | 3.009,6 | 2.861 |
| Motorway signage | 312,48 | 172,68 | 139,80 | 490,3 | 42,8 |
| Cleanliness | 6 | 6 | | 10,5 | - |
| Common and special bridges | 24 | 24 | - | 90 | - |
| Buildings | 112,98 | 62,35 | 50,63 | 285,2 | - |
| Other (material transportation, tidiness, training, etc.) | 67 | 64 | 3 | 60 | - |
| Total | 5.891,33 | 3.862,06 | 2.029,27 | 6.144,8 | 3.112,7 |

| nspections | |
|----------------|--------------|
| Infrastructure | |
| Manhours for | per Category |

| Road Infrastructure per Category | Total
Kentriki
Odos | 2018 A.TH.E. | E65 | 2017
Total Kentriki
Odos |
|---|---------------------------|---------------------|-----------|--------------------------------|
| Road surface | 1,223.19 | 848.12 | 375.07 | 3,713.22 |
| Shoulder, traffic islands, kerbs-gutters and sidewalks | 411 | 318 | 93 | 383.65 |
| Motorway drainage system | 1,713.67 | 767.37 | 946.30 | 1,423.48 |
| Tunnels, cut and cover, landfills and trenches | 1,273.82 | 1,088 | 185.82 | 1,519.27 |
| Green areas and trees | 101 | 69 | 32 | 120 |
| Motorway safety and protection equipment | 3,229.09 | 2,840.07 | 389.02 | 2,241.83 |
| Motorway signage | 350.63 | 276.48 | 74.15 | 741.30 |
| Common and special bridges | 751.38 | 578.63 | 172.75 | 407.50 |
| Support walls and avalanche retaining walls | 560 | 488 | 72 | 154 |
| Signal bridges | 2.32 | 2.32 | | |
| Winter maintenance | 19,382.94 | 8,771.94 | 10,611 | 1,755 |
| Other (material transportation, tidiness, training, etc.) | 6.50 | - | 6.50 | 24 |
| Total | 29,005.54 | 16,047.93 | 12,957.61 | 12,483.25 |

During the 23rd to the 25th of October and the 30th of October to the 1st of November, the annual maintenance work at the Stylida tunnels in the direction of Larissa and Athens respectively took place. In order to facilitate the maintenance work, the company staff in cooperation with the competent Traffic Department implemented the necessary traffic regulations. The upgrading of the closed-circuit television in the Stylida tunnels (T3, T7, T9) was completed in May, while relevant upgrades of the A.TH.E. motorway cameras commenced and were completed during the same period.

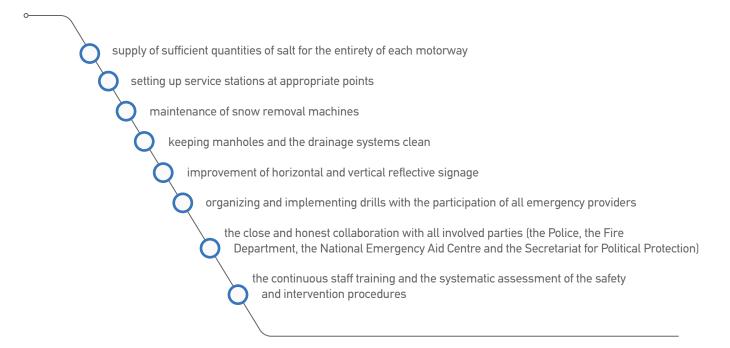
Preventive maintenance works include, amongst others, pavement restoration work, maintenance of median strips, landscaping and all technical works, cleaning of the motorway and all maintenance in electromechanical installations, safety and security equipment, irrigation and fire-fighting systems, etc. More specifically, in 2018, in the context of the commitment we have undertaken, as regards the protection of the natural environment, we continuously cared for the maintenance and expansion of the green areas within the motorway and we have completed a series of median strip maintenance and landscaping works. As expected, the preventive maintenance program forms the majority of the overall maintenance program as we place particular emphasis on reducing the factors that might have a negative impact on road safety.

As regards the enhancing maintenance program, it includes large – scale works, such as pavement replacement, heavy interventions in engineering projects and building facilities, and investments for modernising all electromechanical infrastructure and electronic equipment. The above maintenance works also include the re-designing of intersections, improvements in horizontal and vertical signage, constructions of works (sewerage, irrigation, etc.) in order to avoid accidents, replacement of safety barriers, etc.

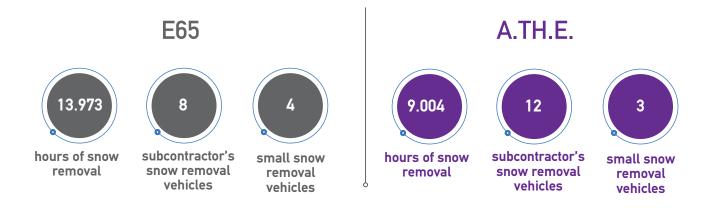
Winter Maintenance Management and Acute Weather Phenomena

Our immediate and effective response in the case of acute weather phenomena is based on exceptional management, sound coordination and compliance with specific, certified procedures for the implementation of the winter maintenance programme. In this manner, one the one hand we prevent and on the other we solve potential problems that might emerge due to heavy snowfall or frost on the pavement.

More specifically, the winter maintenance program focuses on:



Moreover, we adhere to the expected incident management process through which we utilize measurements from the meteorological stations we have installed along the roads, the relevant forecast reports of the competent authorities, as well as reports from our specialised staff, so that we have at any time direct and timely information to respond to acute weather phenomena. At the same time, we immediately notify and inform all competent agencies (the Police, the Fire Department, the National Emergency Aid Centre and the Vehicle Collection Units) and mobilise all Road Safety Patrol Cars when deemed necessary. More than that, we continuously inform users via all available communication channels (such as our corporate webpage, the Phone Customer Service line, the Variable Message Signs located along the motorways, and the toll station staff).



41

GRI 416-1

Structural Adequacy

The continuous and coordinated efforts to qualitatively upgrade and ensure infrastructure maintenance are key to our operation. In this context, in order to ensure the Structural Adequacy of concrete structures the Technical Department of Kentriki Odos designed and implements a program of regular inspections and systematic interventions including a total of 350 large technical sections, bridges and upper and lower crossings.

In 2018, at the A.TH.E. motorway at the Skarfia – Raches section, 60 technical projects were inspected (bridges, upper and lower crossings) and the necessary restoration work was included in the work timetable, such as:

Sealing the joints of lower crossings

Repair of surface concrete wear and tear with protection of the exposed reinforcement

Sealing cracks with resin injections

4.3 Traffic and Incident Management

Proper, efficient and timely traffic and incident management forms the essence of the smooth operation of our motorways.

In Schimatari, the Traffic Management Centre regulates the traffic of vehicles and ensures the orderly and safe operation of the infrastructure. To this end, the Centre is equipped with the most advanced technical means and continuously operates 24 hours a day, all year round. The Special Tunnel Management Centre has been especially formed for tunnels respectively. Both centres have been staffed with specialised experts. More specifically, specialised transport planners use modern tools and state – of – the – art equipment so as to manage emergency calls, collect and study crucial intelligence, and analyse traffic data. Moreover, when deemed necessary, they inform the Road Safety Patrols that act in real time on the motorway, and/or all emergency agencies, such as the National First Aid Centre, the Civil Protection Agency, etc.

Emergency Call Centre data

| | Total
Kentriki Odos 2018 | A.TH.E. 2018 | E65 2018 | Total
Kentriki Odos 2017 |
|------------------------------------|-----------------------------|--------------|----------|-----------------------------|
| Efficiency | 99,7% | 99,8% | 99,7% | 98,6% |
| Incoming calls | 11,470 | 7,826 | 3,644 | 6,045 |
| Answered calls | 11,438 | 7,806 | 3,633 | 5,963 |
| Average call duration (in seconds) | 56.97 | 56.73 | 57.49 | 55.66 |

2018

| Emergency Call Centre -
Issues by Category | Total Kentriki Odos | A.TH.E. | E65 |
|---|---------------------|---------|-------|
| Safety | 0.9% | 1.1% | 0.8% |
| Traffic | 31.9% | 27.0% | 36.8% |
| Maintenance | 38.7% | 36.7% | 40.6% |
| Patrols | 25.8% | 33.4% | 18.1% |
| Other | 2.7% | 1.8% | 3.7% |

The Traffic Management Centre coordinates all actions required to handle emergencies and incidents. Through the Centre, users also receive up-to-date information.

The works of the Traffic and the Tunnel Management Centres are supported, supplemented and completed by:

The Road Safety Patrol Cars

The Free Road Assistance Service

The SOS Phones installed along the entire motorway

The 4-digit 1075 emergency number

| | A.TH.E. | | ° E6 | 5 |
|------------------------------|---------|------|------|------|
| Variable Message Signs (VMS) | 2018 | 2017 | 2018 | 2017 |
| Number of signs (VMS) | 14 | 11 | 5 | 5 |

| | A.TH.E. | | E6 | 5 |
|------------------------------|---------|------|-----------|------|
| Traffic Surveillance Cameras | 2018 | 2017 | 2018 | 2017 |
| Open-air CCTV | 46 | 31 | 44 | 44 |
| Tunnel CCTV | 40 | 33 | 10 | 10 |

Total Incidents by Category

| Incidents Categories | 2018 | 2017 | 2016 |
|--------------------------------------|-------|-------|-------|
| Accidents and Crashes | 177 | 87 | 93 |
| Vehicles breakdown | 2,663 | 1,710 | 1,718 |
| Abandoned Vehicles | 21 | 22 | 8 |
| Obstacles – Spillage - Moving Hazard | 2,982 | 1,529 | 1,498 |
| Congestion | 0 | 0 | 0 |
| Other incidents | 767 | 120 | 127 |
| Total | 6,610 | 3,468 | 3,444 |

It is worth mentioning that the Xyniada-Trikala section of 79km length and the 11 km of the interconnecting branch with the local transport network were delivered in the end of 2017. Therefore 2018 corresponds to a full operation year of the new sections in an area where there was no previous motorway use experience and a lack of motorway safety culture. As a consequence, there was a significant increase in accident indicators in 2018.

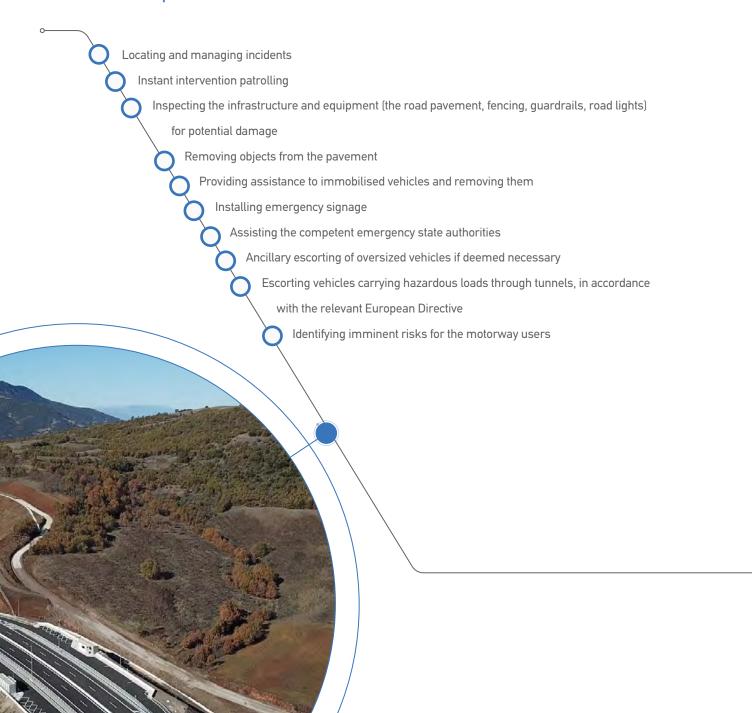
The Role of Road Safety Patrols

Kentriki Odos has a duty to immediately manage incidents and provide immediate assistance to immobilised vehicles. To this end, the company has specialized and trained employees that staff the Road Safety Patrol Cars that are on the motorway 24 hours a day, in order to intervene and assist when deemed necessary. Their role is significant as regards road safety given that their goal is to be as soon as possible at the side of each driver in emergency cases.

- Inspecting the equipment, pointing out damage that might have occurred and spotting potential hazardous situations for commuters on a daily 24-hour basis.
- Directly handling incidents and providing assistance to immobilised vehicles

Their main responsibilities include:

GRI 103-3, GI



Collection of Immobilised Vehicles

We guarantee the smooth and safe operation of the motorways the company is responsible for, offering free collection and transport services of immobilized vehicles. Special company collection units transfer the immobilized vehicles to the nearest safe point, which may be an area at the rest of the road network or at a secure location within the Concession project, such as the Motorist Service Stations. This protects the driver and the passengers of the immobilized vehicle and prevents traffic problems.

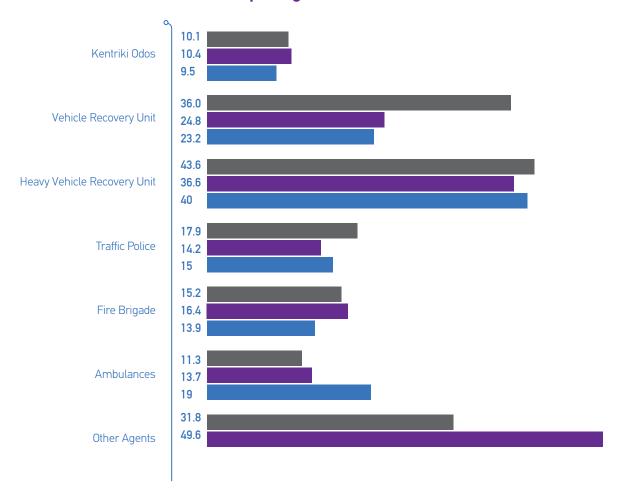
During 2018, 575 vehicles were safely towed away, 101 of which were heavy vehicles.

| | | 2018 | | [°] 2017 |
|-------------------------------|------------------------|---------|-----|------------------------|
| Towed Vehicles | Total
Kentriki Odos | A.TH.E. | E65 | Total
Kentriki Odos |
| Conventional Vehicle Recovery | 474 | 287 | 187 | 346 |
| Heavy Vehicle Recovery Unit | 101 | 89 | 12 | 87 |
| Total | 575 | 376 | 199 | 433 |

| Immobilised Vehicles Incidents | A.TH.E. | E65 |
|--|---------|------------|
| Flat tire | 352 | 131 |
| Mechanical failure | 835 | 465 |
| Fuel | 129 | 71 |
| Other | 53 | 233 |
| Unrecorded | 208 | 187 |
| Total | 1,577 | 1,087 |
| Driver sickness
(it is a separate event and it is not included in the report of immobilised vehicles) | 12 | 2 |

| Kentriki Odos Average Response Timo per Incident Type (minutes) | e
 2018 | ° 2017 | 2016 |
|---|-------------|--------|------|
| Accidents and Crashes | 13.0 | 10.1 | 12.3 |
| Vehicles Breakdown | 10.7 | 9.5 | 9.4 |
| Abandoned Vehicles | 13.8 | 6.8 | 21 |
| Obstacles - Spillage - Moving Hazard | 10.6 | 11.5 | 9.3 |
| Other types | 5.2 | 8.3 | 10.2 |

Average Response Time per Agent (minutes)

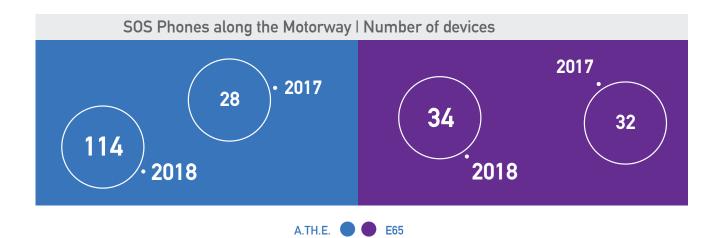




The SOS Phones and the 4-digit 1075 Emergency Number

The SOS Phones: 28 special SOS Phones have been installed along the motorways, including in the Stylida tunnels, offering the free-of-charge communication with the Traffic Management Centre.

The 4-digit 1075 emergency number: Users are able to directly communicate with the Traffic and Tunnel Management Centres in order to provide information regarding emergency incidents, by calling the 1075 emergency number.





4.4 Road Safety Awareness Campaigns

At Kentriki Odos, we are committed to implementing all those actions necessary for safety and for the high quality of the technical characteristics of the road system. Moreover, we recognize that in order to have zero accidents there should be initiatives to promote road safety culture. To this end, we place emphasis on the impact stemming from high-speed driving and aggressive driving, as well as on preventing secondary accidents.

Specifically, the three main axes that we focus on for creating, cultivating and enhancing a knowledge-based safe driving culture are:

A) Strategic partnerships with specialized organizations

We have been collaborating with the "Panos Mylonas" Hellenic Road Safety Institute to implement innovative programs with an emphasis on young people and vulnerable social groups. At the same time, convinced that road user education is primarily a matter of education, we support actions of a wider geographic scope aimed at informing and raising the awareness of the general public on issues of road safety.

B) Information and awareness campaigns

Throughout the year, we implement awareness campaigns for drivers/users of our motorways. The main topics we focus on are driving under difficult weather conditions, good driving behaviour within a high-speed motorway, specific road safety parameters within tunnels, proper use of child seats, non-aggressive driving

and eco-driving, etc. Our campaigns mainly include briefings on our website and distribution of leaflets at toll stations.

C) Speeches and presentations

We believe in the positive impact that our partnerships create, and hence we systematically take part in workshops, presentations and conferences to disseminate the message of safe driving and to inform about the actions we implement at the local level.

| Connection to | | 2019 | | |
|--|--------------------------------|---|---|---|
| the Sustainable _Development Goals | Торіс | Goal | Progress | Goal |
| 3. GOOD HEALTH AND WELL-BEING 11. SUSTAINABLE CITIES AND COMMUNITIES | Accident related indicators | Zero accidents on
motorway (refers to
users and employees) | Users: 177
Employees: 1 | Zero accidents on
motorway (refers to
users and
employees) |
| 3. GOOD HEALTH AND WELL-BEING 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE AND COMMUNITIES | _s Motorway upgrades | At the Skarfia – Raches
section, 60 technical
projects were inspected | Completed | |
| 3. GOOD HEALTH AND WELL-BEING | Accident response time | Reduction of response time | Average response
time reduction from
10.4 min to 10.1 min | ongoing |
| 3. GOOD HEALTH AND WELL-BEING | Annual Recertification | Annual Recertification:
ISO 39001:2012 | Completed | Annual Recertification |



Primary Sustainable Development Goals



9. INDUSTRY, INNOVATION AND

Secondary Sustainable Development Goals



17. PARTNERSHIPS FOR THE GOALS

In 2018:

6,355 calls were received by the Customer Care Call Centre

5 tenders were conducted through the online platform

131% increase in our investments towards local suppliers for 2018

5.1 Quality at the Forefront

In the company we guarantee high quality services, in full compliance with the Greek and European legislation. Since 2009, the certified Quality Management System (ISO 9001: 2008) has been incorporated into all Kentriki Odos activities which enables us to upgrade processes and internal organization systems, so that our response be immediate and effective to the growing needs of the areas adjacent to our motorways of responsibility, as well as to the operating requirements of the motorways themselves.

We also continue applying the ISO 14000, OHSAS 18001 and ISO

39001 standards, proving that we constantly aim to implement new ways to further improve the quality of our services.

In 2018, we focused on our business efficiency by improving the quality and efficiency of our services and responding to the demands of our stakeholders. We primarily focused on communicating with drivers in order to understand how they perceive infrastructure issues so as to improve the quality of the services we provide.

5.2 Communication with Drivers

Kentriki Odos utilizes many communication channels with the drivers, since effective communication with them is of prime importance. Specifically:

- The Customer Care Call Centre at 801 700 7000 number
- The Customer Service Centres located in:
 - 1. A.TH.E. motorway, right before the Aghia Triada Toll Station, towards Lamia
 - 2. E65 motorway, after Trikala Toll Station, towards Lamia
- The Customer Service Email Address customercare@kentrikiodos.gr
- The corporate website www.kentrikiodos.gr
- Opinion surveys conducted every 18 months

Kentriki Odos communicates systematically with all its stakeholders to:

Officially receive the opinion of stakeholders affected by the company's activities

Regularly collect opinions with a view to recognize trends

Thoroughly record all issues that arise and seek solutions

Urge stakeholders to point out possible gaps

 $\label{provide} Provide\ information\ about\ its\ strategic\ actions\ and\ their\ outcome$

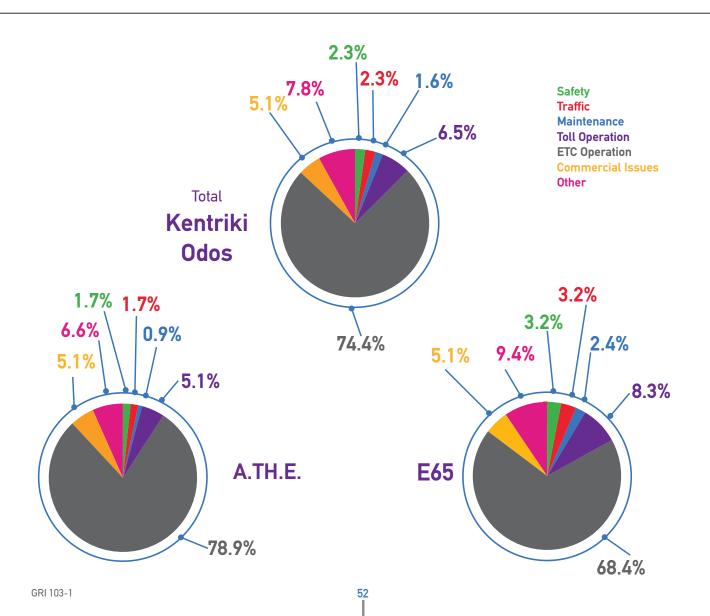
Informs about operational issues



Customer Care Call Centre data

| • | | 2018 | | 2017 | |
|--|------------------------|---------|-------|------------------------|---|
| | Total
Kentriki Odos | A.TH.E. | E65 | Total
Kentriki Odos | |
| Incoming calls | 6,355 | 4,942 | 1,413 | 5,883 | |
| Answered calls | 5,815 | 4,522 | 1,293 | 5,454 | |
| Efficiency | 91.5% | 91.5% | 91.5% | 92.7% | ٩ |
| Total complaints submitted by phone | | 467 | | 289 | ر |
| Number of calls with complaints about noise barriers | | 0 | | 1 | |

Customer Care Call Centre - Issues by Category - 2018



Written Communication

| | 2018 | 2017 |
|---|-------|-------|
| Total requests and complaints submitted | 1,664 | 1,712 |
| Requests and other issues | 1,608 | 1,618 |
| Complaints submitted | 56 | 94 |
| Complaints about noise barriers | - | - |
| Average response time (days) | 0.53 | 0.53 |

| | | 0 |
|-------------------------|--------|----|
| Written Communication - | 2018 - | |
| Issues by Category | Total | 0- |
| Safety | 0.6% | 0- |
| Traffic | 0.0% | 0- |
| Maintenance | 0.6% | 0- |
| Toll Operation | 18.1% | 0- |
| ETC Operation | 71.7% | 0- |
| Commercial Issues | 1.8% | 0- |
| Compensation Claims | 1.8% | 0- |
| Other | 5.4% | |

| Complaints by Category | Customer C
Cent | | Written communication | | Total | |
|------------------------------------|--------------------|--------|-----------------------|--------|--------|--------|
| | Number | % | Number | % | Number | % |
| Toll operation | 119 | 25.48% | 11 | 19.64% | 130 | 24.86% |
| Traffic and safety | 132 | 28.27% | 11 | 19.64% | 143 | 27.34% |
| Other | 70 | 14.99% | 5 | 8.93% | 75 | 14.34% |
| Commercial policy | 49 | 10.49% | 4 | 7.14% | 53 | 10.13% |
| User requests (compensations etc.) | 24 | 5.14% | 15 | 26.79% | 39 | 7.46% |
| Signage | 52 | 11.13% | 9 | 16.07% | 61 | 11.66% |
| Interoperability | 15 | 3.21% | 0 | 0.00% | 15 | 2.87% |
| Constructions | 6 | 1.28% | 1 | 1.79% | 7 | 1.34% |
| Total | 467 | 100% | 56 | 100% | 523 | 100% |

In total, we received, handled and solved a total of 523 complaints in 2018, which in accordance with our policies fall into 8 main categories: Toll operations (130), Traffic and security (143), Commercial policy (53) Signage (61), Driver Requests (39), Project (7), Interoperability (15) and Miscellaneous (75). However, we did not receive any report nor any complaint about major environmental issues.

5.3 Additional Services for Users

7 Temporary Parking Stations operate along the motorway

| Position | Direction |
|-----------|-----------------|
| 188th km. | Both Directions |
| 195th km. | Both Directions |
| 196th km. | To Lamia |
| 205th km. | Both Directions |
| 209th km. | To Lamia |
| 209th km. | To Athens |
| 221st km. | To Larissa |

In 2018, the Sofades Motorists Service Station at the Karditsa Regional Unit of the Thessaly Region started operating in order to meet the fuel supply and catering needs of drivers on the motorway.



GRI 103-1 54

Toll Zone System for Charging and Collecting Toll Rates

Toll rates as well as their potential modifications are expressly defined in the Concession Agreement which has been ratified by the Hellenic Parliament and is a law of the State. In no case can the company unilaterally modify the toll rates.

Ongoing investments are required in order to keep unchanged the quality characteristics of contemporary motorways. Paying toll rates is one of the most effective methods for financing construction and maintenance, as well as improving our cutting-edge motorways.

At this stage, and in accordance with the institutional framework of Kentriki Odos, at the A.TH.E. motorway, two toll zones are identified and 2 zones for E65.

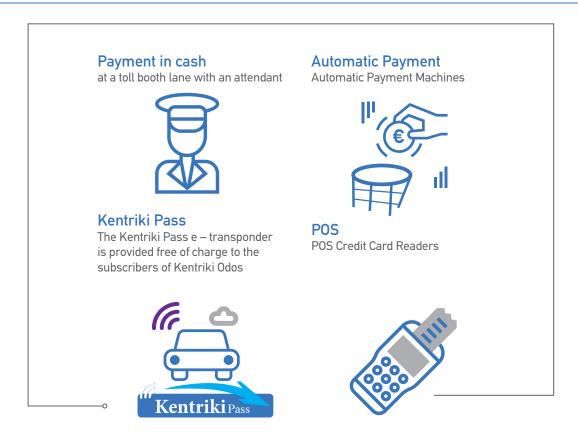
The toll rate for each station is determined as follows:

- At each frontal toll station, the toll rate is determined per direction, based on the total length of the zone to which it belongs.
- At the exit from lateral toll stations, the toll rate corresponds to the length travelled from the beginning of the zone to which the station belongs, up to the station.
- In the lateral toll stations, the toll rate corresponds to the length of the road to be travelled by the user from the toll station to the end of the zone.

The toll rates for a route vary depending on the vehicle category and the motorway zone in which the driver is traveling. Under no circumstances can any user who has paid the toll fee at the frontal station pay again at a lateral station in the same zone, during the same journey.

More information is available at: https://www.neaodos.gr/tolls/?lang=en





Evolution of ETC Transponders and Accounts for Kentriki Pass

| | 2018 | 2017 | 2016 |
|---|-------|-------|------|
| Number of current Accounts by the end of the month (average) | 2,685 | 1,348 | 483 |
| Total number of active Transponders by the end of the month (average) | 3,568 | 1,814 | 577 |

5.6 Personal Data Management

In Kentriki Odos, we take the appropriate measures for the protection of personal data and for ensuring the privacy of drivers.

We take the utmost safety precautions in order to collect, store and manage/process personal data, complying with the regulations set by the Personal Data Protection Authority and the relevant legislation. Especially as regards securing electronic transactions, the company applies special procedures and security standards.

The data we record is mainly collected from:

- telephone conversations with drivers on customer service issues, for the sole purpose of improving the services rendered
- requests for services such as cards for people with special needs, and subscription plans
- cameras along the motorway used exclusively for smooth traffic management and effective traffic accident response
- from the closed TV circuit in the Traffic Management Centre, as defined by the relevant "Closed Circuit Television Directive" of the Personal Data Protection Authority

5.7 Responsibility in the Supply Chain

Kentriki Odos has excellent collaboration with partners, subcontractors and suppliers, based on a shared understanding

of the project's importance and the need to comply with the terms and conditions that guarantee its quality.

Selecting Partners, Subcontractors and Suppliers

We ensure the high quality of our services with the appropriate selection procedures for our partners, subcontractors and suppliers. Thus, we call upon our suppliers to respect and comply with our corporate values and principles.

Through the Quality Management System, the company has and implements binding procedures for managing its relationship with suppliers and the projects they undertake. More specifically, it includes indicatively:

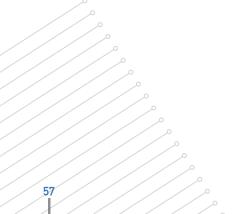
- Selection after an open market survey
- Submission of at least 3 different offers
- The requirements are predefined by our company
- Responsible business activity of the suppliers and the quality features of the service / product are taken into account
- Annual evaluation of existing suppliers' performance

The following are also provided for its subcontractors:

- the obligation to sign a declaration of compliance with the environmental requirements of the project in order to have a cooperation agreement with the company;
- their formal commitment to comply with the environmental conditions and to take preventive measures to avoid adverse environmental impacts;
- The company's key subcontractors are audited through regular environmental inspections, notably regarding operation and maintenance issues, and are required to provide the required certifications and permits.

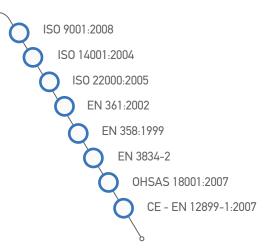
Kentriki Odos suppliers include:

- The construction consortium
- Engineering companies
- Suppliers exclusively working on the construction works of Kentriki Odos
- Subcontractors for the maintenance of civil engineering works, snow-clearing and equipment maintenance
- Suppliers for consumables
- External collaborators providing support for operating issues (attorneys, certified auditors, etc.)



Most of our main suppliers are certified, according to one or more of the following certification systems depending on their industry:

During 2018, the company did not carry out environmental audits of new suppliers, nor did it observe any significant adverse environmental performance of its suppliers. Moreover, no incidents were recorded by our suppliers that led us to terminate any cooperation. Human rights issues have not been included in our suppliers' evaluation criteria.



Supplier Assessment

The procurement department has the coordinating role for all supplies and tenders. To evaluate our suppliers, there are simple procedures that are characterized by merit and transparency. The criteria for their annual evaluation include the following:

- Meeting deadlines
- Transaction quality
- Response potential
- Product/services availability
- Product/services compliance with the predefined by the company requirements
- Compliance with safety and health regulations
- Cost
- After–sales service

Developing the Significance of the Procurement Department

In 2018, Kentriki Odos continued to invest in its relationships with its suppliers and in the optimal management of its supply chain. Specifically:



The procurement department gradually undertakes all procurement calls and tenders, and centralizes all procurement matters, thereby increasing the efficiency of the purchasing system.

Organizing tenders for supplies of materials that can be grouped (e.g. vehicle tires) so that a centralized agreement can achieve economic benefits and speed up purchasing

Meetings with critical vendors continued in order to better communicate, prevent, or resolve issues.

External safeguarding bodies carry out audits regarding the ISO 14001: 2004 systems implemented by the subcontractors. In 2018, no inspections for environmental issues on new company suppliers took place, nor was any significant negative environmental performance recorded by a supplier.

Local Suppliers Development

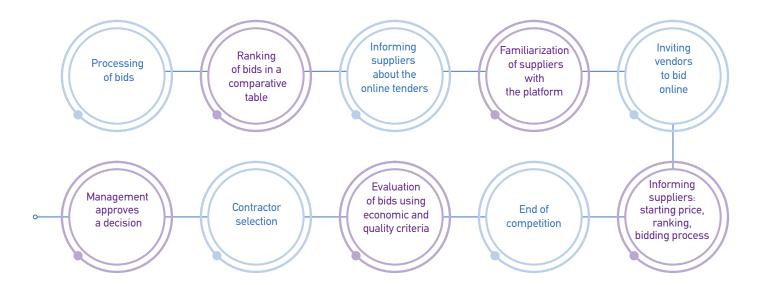
Developing and maintaining good relationships with our supply chain is a commitment that Kentriki Odos is making on a daily basis. Through our investment in long-term partnerships at both national and local levels, small suppliers are strengthened, and immediate and multiplier effects are generated at multiple levels.

| | 2018 | | 20 | 01 7 | 2016 | | |
|----------------------|------------------------|----------------|---------------------|----------------|------------------------|----------------|--|
| Suppliers Categories | Number of
Suppliers | Investment (€) | Number of Suppliers | Investment (€) | Number of
Suppliers | Investment (€) | |
| Local | 206 | 425,905.88 | 151 | 184,443.51 | 153 | 300,558.11 | |
| National* | 164 | 7,841,905.09 | 155 | 105,072,934.72 | 118 | 174,994,312.14 | |
| International | 11 | 265,420.70 | 16 | 676,410.20 | 14 | 500,098.96 | |
| Total | 381 | 8,533,231.67 | 322 | 105,933,788.43 | 285 | 175,794,969.21 | |

^{*}National suppliers also include transactions with connected parties. The change observed compared to 2017 is due to the completion of the Construction.



Online Tenders



In some cases, regarding procurement tenders, Kentriki Odos publishes online tenders through a dedicated online platform. The platform allows prospective suppliers to make a final bid online in a set timeframe having the opportunity to submit multiple interim bids.

basis of economic and quality criteria and the appropriate tenderer is selected.

In 2018, five tenders were held through this platform, with significant benefits for Kentriki Odos.

At the end of the tender, the bids are evaluated in their totality on the

| Connection to | 1 | 2019 | | |
|--|---------------------------------|---|---|---|
| the Sustainable
Development Goals | Topic | Goal | Progress | Goal |
| 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE | Customer Satisfaction
Survey | Retention of customer service ranking results | New survey con-
ducted across all our
motorways | Run a mystery
survey for the
assessment and
improvement of our
services |
| 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE | Customer Care Call
Centres | Customer service (phone):
90% of issues handled
within 2 minutes of call
receipt | Maintain 90% | Conduct a new
survey for all
our motorways |
| 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE | Driver services upgrade | Install POS in all toll stations | Completed | |
| 17. PARTNERSHIPS
FOR THE GOALS | Electronic tender plat-
form | Platform completed and fully operational | Completed | Utilise platform
for tenders |
| | | ,
, | | |





Primary Sustainable Development Goals



8. DECENT WORK AND ECONOMIC GROWTH

Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



4. QUALITY EDUCATION



5. GENDER EQUALITY



10. REDUCED INEQUALITIES



16. PEACE, JUSTICE AND STRONG INSTITUTIONS

In 2018:

68 new employee hires

108 persons participated in the training courses organized

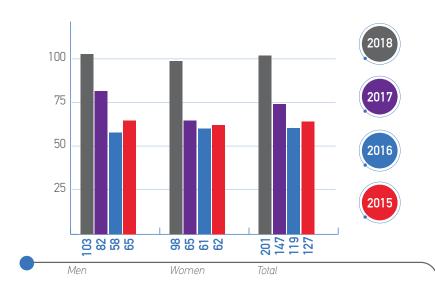
Our employees constitute the most significant part of Kentriki Odos. The commitment of our people and enhancing their talent are the driving forces for the success of the company and its long-term potential. That is why, we in Kentriki Odos strive, in alignment with our corporate principles and values, to continually improve the working environment and manage human resources on the basis of meritocracy and respect for diversity.

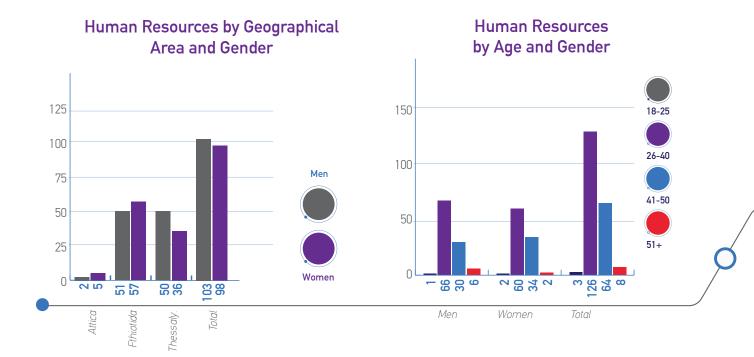
We contribute to enhancing Greek rural areas, employing almost all our employees from regions outside Attica.

In 2018, Kentriki Odos employed 201 employees in total, 103 of whom were men and 98 were women.

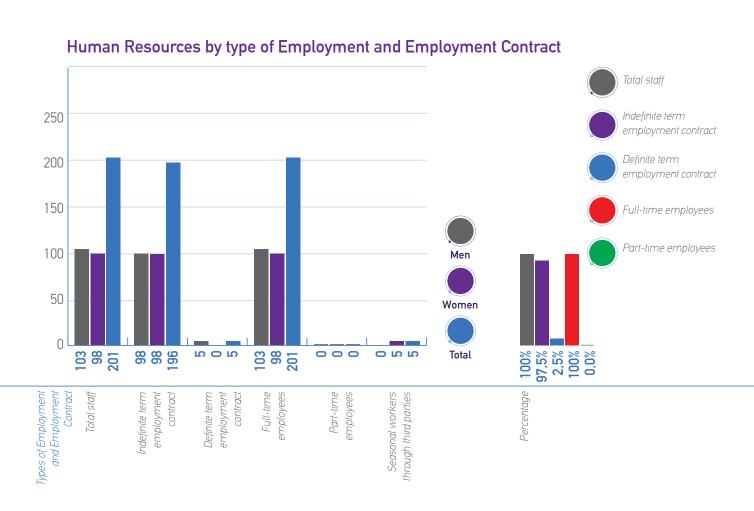
103 Men 51,2% **98**Women 48,8%

Human Resources Data





All employees are full-time, and the vast majority of them (196 people) have individual agreements of infinite employment status.



Kentriki Odos cooperates with temporary employment agencies on a permanent basis to cover its emerging or seasonal needs, such as maternity leaves. In 2018, 5 female employees joined from external employment agencies.

With the expansion of the motorway and new sections being delivered, the company has recruited and employed a significant number of people. Specifically, in 2018, 68 people were hired, while 14 left the company.

New Employee Hires by Age and Geographical Area

Employee Turnover by Age and Geographical Area

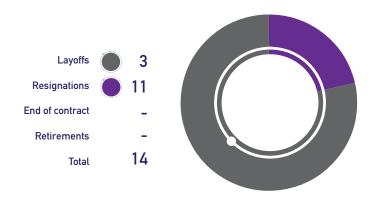
| | 18-25 | 26-40 | 41-50 | 51+ | | 18-25 | 26-40 | 41-50 | 51+ |
|---|---------------------------|-------|---|-----|-----------|-------|-------|-------|-----|
| Attica | 0 | 3 | 0 | 0 | Attica | 0 | 3 | 0 | 0 |
| Fthiotida | 0 | 4 | 0 | 0 | Fthiotida | 0 | 4 | 2 | 1 |
| Thessaly | 1 | 35 | 22 | 3 | Thessaly | 0 | 3 | 1 | 0 |
| Total | 1 | 42 | 22 | 3 | Total | 0 | 10 | 3 | 1 |
| incoming (Total number
of incoming / total
employees) | of incoming / total 34,0% | | Outgoing (Total number of outgoing / total employees) | | 7, | 0% | | | |

New Employee Hires by Gender and Age

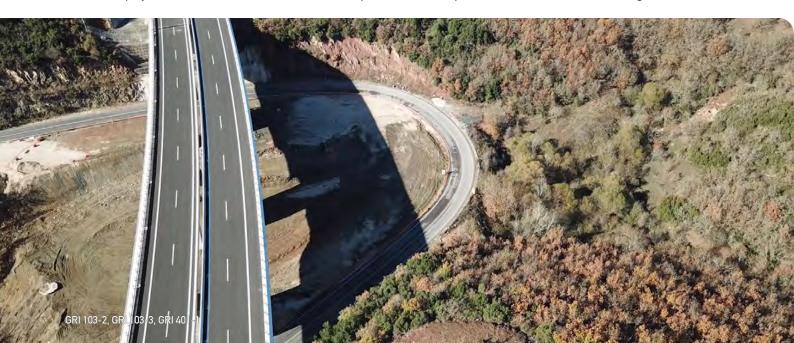
Employee Turnover by Gender and Age

| | 18-25 | 26-40 | 41-50 | 51+ | | 18-25 | 26-40 | 41-50 | 51+ |
|-------|-------|-------|-------|-----|-------|-------|-------|-------|-----|
| Men | 1 | 19 | 9 | 1 | Men | 0 | 8 | 1 | 0 |
| Women | 0 | 23 | 13 | 2 | Women | 0 | 2 | 2 | 1 |
| Total | 1 | 42 | 22 | 3 | Total | 0 | 10 | 3 | 1 |

Turnover Analysis 2018



3 employees that were transferred from other companies of the Group have been included in the above figures.



Equal Opportunities for All Employees

The protection of rights as well as the protection of equality of opportunities and equality before the law characterize our company's anthropocentric policy and is highlighted by actions such as:

- The recruitment and evaluation process based on knowledge, skills, performance and respect for company principles
- Avoidance of discrimination in employees' wages while respecting the principle that all employees are paid the same for equal value of work
- Strengthening the process of Internal Communication that allows all employees to informally propose and discuss corporate issues with management representatives, managers, directors, etc.
- Encouraging the professional development of employees without discrimination based on gender or any other form of diversity
- Adopting an open-door policy as a particular component of its culture so that employees have the opportunity to submit informal suggestions, guidelines or make recommendations to senior management.

In 2018, there were no incidents of discrimination in the workplace, and no reporting or complaints were made by employees and/or third parties.

Gender Ratio by Employees Category / Rank

| (D.) | Number | | | % | |
|----------------------|--------|-------|-------|----------|-------|
| Category / Ranks | Men | Women | Total | Men | Women |
| Managers | 1 | 0 | 1 | 100% | 0% |
| Administrative staff | 25 | 19 | 44 | 56.8% | 43.2% |
| Labour staff | 77 | 79 | 156 | 49.4% | 50.6% |
| Total | 103 | 98 | 201 | 51.2% | 48.8% |

6.1 Talent Development

Staff Performance Evaluation

The company pursues to identify, through employee performance management processes, high-potential employees who have the momentum and ability to take leadership roles within the company. Through the Performance Evaluation Process and the methodology of development

centres, we look for fair and objective evaluation of each employee's contribution but mainly we look for the creation of opportunities for personal and professional development in the organizational structure of the company.

At the end of 2018, Kentriki Odos carried out the evaluation process for 2017, in two phases. The first phase included maintenance, operation and traffic management staff and the second phase included the administrative staff. Out of 201

employees, 189 (Men: 100, Women: 89) (94%) were evaluated. The process was carried out according to the formal procedure for all eligible employees and all employees received feedback.

Development Centres

To the same end, development centres are the most accurate, objective evaluation method as regards staffing critical positions. Adopting this specific methodology aims at the identification of people with potential and the creation of a

dynamic team with talent and leadership skills that could successfully contribute to Kentriki Odos accomplishing its great vision, i.e. "changing the map of Greece, setting an example in its field".

Regarding the development centres' methodology:

It can be immediately implemented in a short period of time and with no exorbitant financial requirements from the part of the company as regards the evaluation of candidates and employees

It leads to proper staffing and succession of employees in critical positions

It encourages the effective creation of personal development schemes within the company

The results from the implementation of the Development Centres:

All heads of business units maintain that the Development Centres contributed to:

- 1 talent recognition and the creation of a growth culture at an 87% rate
- the improvement of their team bonding at a 73% rate



| Development Centres | | | Distribution of Developi | Distribution of Development Centres | | |
|----------------------------------|-----|-------|--------------------------|-------------------------------------|-------|--|
| Geographical Area
(Workplace) | Men | Women | Category / Ranks | Men | Women | |
| Prefecture of Karditsa | 3 | 0 | Administrative staff | 3 | 0 | |
| Total | 3 | 0 | Total | 3 | 0 | |

Distribution of Development Contr

Investing in Knowledge

Kentriki Odos follows and implements education and training programs with a view to responding to the overall or individual needs and characteristics of employees, taking into account:

The requirement to respond to the company's strategy

The creation of favourable conditions that enhance the professional development of employees

The sensitivity of the issues handled by employees and the provision of the necessary tools

Actions related to individual development and skills development

The expectations of each employee

The development of talented executives

Employee Training and Skills Development

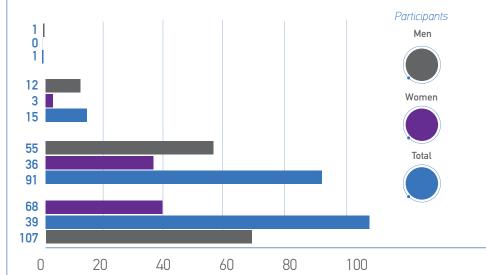
Managers

Administrative staff

Labour staff

Total

Category / Ranks



During 2018, 107 employees participated in training and skill development programs, which were divided into 7 general modules. A total of 1,162.5 hours was devoted to trainings, with a particular focus on health and safety.

| Training Hours by
Human Resources
Category | Т | Training Hours | | Average Training Hours | | Hours |
|--|-------|----------------|---------|------------------------|-------|-------|
| | Men | Women | Total | Men | Women | Total |
| Managers | 24 | - | 24 | 24 | - | 24 |
| Administrative staff | 358.5 | 160 | 518.5 | 14.34 | 8.42 | 11.78 |
| Labour staff | 476 | 144 | 620 | 6.18 | 1.82 | 3.97 |
| Total | 858,5 | 304 | 1,162.5 | 8.33 | 3.10 | 5.78 |

Number of Programs Financed by the Company Postgraduate Programs

2018

1

| Training Hours by Topic | Training Hours | Number of Trainings |
|--|----------------|---------------------|
| Health and Safety | 794 | 7 |
| IT / PC Operation / Systems | 90 | 2 |
| Human Resources Management
& Leadership | 158 | 4 |
| Financial - Accounting | 18,5 | 1 |
| Corporate Social Responsibility -
Standards | 8 | 1 |
| Technical Issues | 16 | 2 |
| Legal | 78 | 1 |
| Total | 1,162.5 | 18 |

Official briefings/trainings of personnel on human rights issues have not yet been included in the provisional educational curriculum, as well as topics related to the fight against corruption and corporate governance.

6.2 Additional Benefits

Being aware of the role of employees in meeting its corporate goals, Kentriki Odos takes steps to create an attractive work environment and improve the level of employee satisfaction by offering, in addition to legislatively provided benefits (maternity / paternity leaves) additional benefits, such as:

For all employees

- Group Insurance which includes:
 - 1. Life and Health Insurance
 - 2. Immediate medical assistance program

Depending on the job position and the job field:

- Vouchers (€14,153 for 2018)
- Productivity bonuses
- Mobile phones
- Company cars

In the reporting year, 6 female workers received special maternity protection leaves, one of which returned to her position and the remaining 5 are expected to return in 2019.

6.3 Health and Safety at Work

Kentriki Odos continuously endeavours to ensure a workplace environment without accidents at work and this is a key factor for its sustainability. In this context, the company strictly adheres to the applicable provisions of the Greek and European legislations on Health and Safety issues, using in this implementation, the Health and Safety Management System, certified according to the OHSAS 18001: 2007 international standard.

The Health and Safety Management System aims to eliminate or minimize the risks posed to employees, highway users or third parties associated with any of the company's activities, while helping to prioritize and develop programs to achieve the corporate Health and Safety goals.

| Health and Safety Indices | 2018 | 2017 | 2016 | 2015 |
|---|--------|------|------|--------|
| Injury or accident rate of total staff (%) | 0.50 | 0 | 1.68 | 3.67 |
| Hours of absence / total work hours (%) | 0.004 | 0 | 0.00 | 0.42 |
| Accident frequency indicator | 2.69 | 0 | 8.39 | 20.13 |
| Accident severity indicator | 40.35 | 0.00 | 0.00 | 636.94 |
| Number of fatal accidents | 0 | 0 | 0 | 0 |
| Lost work days due to accident | 15 | 0 | 0 | 348 |
| Incidents without days of absence | 0 | 0 | 2 | 4 |
| Injury Rate (IR) | 0.54 | 0.00 | 1.68 | 4.03 |
| Lost Day Rate (LDR) | 8.07 | 0.00 | 0.00 | 849.68 |
| Absence rate (AR) | 100.05 | 0.00 | 0.00 | 127.39 |
| Total work accidents | 1 | 0 | 2 | 13 |
| Work accidents with days of absence from work | 1 | 0 | 0 | 9 |

In addition, Kentriki Odos provides:

Independent Health and Safety Advisers such as the Safety Officer and Occupational Health Doctor who regularly visit all facilities of the company for the purpose of preventing and protecting employees from all forms of occupational risk,

Free medical examination programs for all employees according to their job position and the risk category as defined in the Occupational Risk Assessment Study,

In the framework of protecting the employees of the motorway maintenance department, the company provides Tetanus, Hepatitis A 'and B' vaccinations,

Group Health and Medical Care Program supporting workers and their dependents.

The company supports its employees and their families especially should a severe medical condition occur. Such company support includes:

- psychological support by certified psychologists and therapists
- provision of specialised medical treatment by specialists
- purchase of specialised medical equipment
- provision of financial aid and paid leave during the illness or the recovery period

Regarding the creation of safety conditions in the workplace, a quarterly Health and Safety Meeting is held with the participation of:

- Quality, Safety & Environment Manager
- Quality Management Assistant(s)
- Human Resources Manager
- Recruitment & Development Supervisor
- Senior EM Project Engineer
- Traffic Manager
- Winter Maintenance & Equipment Engineer
- Maintenance & Traffic Management Director
- Traffic Management Systems Engineer
- Toll Station Manager
- Operations Engineer

These meetings serve as a link between motorway employees and the Health and Safety and Human Resources departments, with the aim of managing issues such as:

- Personal protective gearing
- Committees handling Health and Safety issues in which representatives of the management and the employees participate
- Participation of employee representatives in Health and Safety inspections, audits and accident investigations
- Training and education
- Complaint submission system
- Prerogative to refuse to do unsafe work
- Occasional inspections
- Compliance with the Conventions of the International Labour Organisation (ILO)
- Settlements or committees to resolve problems
- Commitments on standards for performance goals or the kind of practice applied

Indicatively and not restrictively, the following Health and Safety programs have taken place:

- Measurements of working noise and harmful chemical substances in facilities
- Building evacuation drills
- Revision of the Written Occupational Risk Assessment of facilities
- Regular Health and Safety inspections at project facilities as well as on motorway works
- Health and Safety information material was given to employees
- First aid and fire safety trainings

It is noteworthy that during 2018 a total of 794 hours of training in Health and Safety for employees took place. These training hours were mainly devoted to issues of first aid and proper driving behaviour.

| Торіс | Training hours | Entries | Training hours/
employee |
|---|----------------|---------|-----------------------------|
| First Aid Principles & Health & Safety Instructions (Labour Staff & Team Leaders) | 336 | 21 | 16 |
| Driving Behaviour & Safety | 336 | 84 | 4 |
| Working Safely at Height | 44 | 11 | 4 |
| Working Safely at Height (Tunnels) | 32 | 4 | 8 |
| Tunnel and Motorway Operations and Safety | 24 | 1 | 24 |
| First Aid Principles - Seminar for Top Executives,
Managers & Heads of Departments | 16 | 2 | 8 |
| Evacuation of Buildings and Use of Fire Extinguishing
Equipment | 6 | 3 | 2 |
| Total | 794 | 126 | - |

| Health and Safety Investment Categories | 2018 (€) |
|---|-----------|
| Certifications (OHSAS 18001:2007, ISO 39001:2012) | 5,300 |
| Health and Safety Monitoring Program through internal inspections | 3,333.36 |
| Program for Occupational Noise Measurement in Aghia Triada toll station | 4,400 |
| Employees medical insurance | 72,578.67 |
| Occupational Physician/Safety Technician | 5,533.60 |
| Pharmacy expenses / medical supplies | 4,595.23 |
| Total | 95,740.86 |

2018 (€)

| Connection to | | 2019 | | |
|--|--|--|---|--|
| the Sustainable
Development Goals | Topic | Goal | Progress | Goal |
| 4. QUALITY EDUCATION | Employee training | Total training hours/ total
employees>5 | Achieved. Total training
hours/ total
employees: 5.78 | Total training
hours/ total
employees>5 |
| 8. DECENT WORK AND ECONOMIC GROWTH | Integrate Corporate
Responsibility
questions in the
employee's survey | Conduct the employee survey which takes place every 18months. | Due to internal structural
changes the next survey is
scheduled
for the first half of 2019 | The next survey is scheduled for the first half of 2019 |
| 5. GENDER 8. DECENT WORK AND ECONOMIC GROWTH 10. REDUCED 16. PEACE, JUSTICE AND | Development centres | 3 employees to take part in the
Development centres process | Achieved | Further support
and development
of the employees
participating in
the development
centres |
| 3. GOOD HEALTH AND WELL-BEING STRONG INSTITUTIONS 4. QUALITY EDUCATION | Training on
Road Safety | Train 84 employees
on Road Safety | 84 employees trained in
Road Safety by "Panos
Mylonas" Road Safety
Institute | The goal is achieved and training for new employees will be conducted if required for new employees |
| 3. GOOD HEALTH AND 4. QUALITY EDUCATION | Training on stray
animal management | According to the training plan,
the next training on stray animal
management is scheduled for
2018/2019 | Goal remains for 2019 for 1 employee | Training on stray animal management to be conducted when sufficient number of participants is reached |
| | | First Aid Training and Health &
Safety Policy and Procedures for
new employees: Goal is to train 41
employees | 21 people trained | The goal was partially achieved in 2018 and will be attained during 2019 by training 23 employees |
| 3. GOOD HEALTH AND WELL-BEING 4. QUALITY EDUCATION | Training on
Health & Safety | Training on Working Safely at
Height for new employees: Goal is
to train 15 employees | Achieved | Goal to train
new employees
hired after the
2018 training
completion or in
2019 |
| | | Conduct at least 150 training hours
on Health & Safety for middle and
high-ranking employees | Conducted 101.5 of training | |
| 3. GOOD HEALTH AND WELL-BEING | Annual Recertification | Annual Recertification:
OHSAS 18001:2007 | Completed | Annual
Recertification |
| 4. QUALITY EDUCATION 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Employee training on
Corporate responsibility
and Sustainability | Active involvement of employees in material topics update | All departments/ functions participated in the process | |





Primary Sustainable Development Goals



12. RESPONSIBLE CONSUMPTION AND PRODUCTION



13. CLIMATE ACTION

Secondary Sustainable Development Goals



3. GOOD HEALTH AND



6. CLEAN WATER AND SANITATION



7. AFFORDABLE AND



. SUSTAINABLE CITIES AND COMMUNITIES



15. LIFE ON LAND



17. PARTNERSHIPS FOR THE GOALS

In 2018:

Installation of a new air pollution measuring station

investments of €191,938 for environmental protection projects

Zero noise levels exceedances

Being aware of environmental protection issues and environmental risk prevention, Kentriki Odos implements its environmental policy by prioritizing to include environmental issues in its day-to-day business decisions.

Kentriki Odos examines in depth all the possible environmental impacts and develops all possible scenarios to mitigate and effectively address any adverse impacts it may identify. Environmental sustainability has been a key objective since the project design phase. For Kentriki Odos, achieving environmental sustainability has been an important goal since the design of the motorway. The company recognises the extent of its impact on the natural environment and takes care to reduce its environmental impacts and halt climate change by implementing a comprehensive strategy designed to achieve harmonization of the motorway with the environment. In this regard, the company strictly implements applicable environmental legislation throughout the scope of its activities and often goes

beyond it. It plans actions aimed at raising the awareness of its employees and associates and aims to minimize the negative impacts that have been identified and stem from its operation. At the same time, the effects of climate change and the severity of weather events affect the operation of the road network. There is a growing need for invasive maintenance and infrastructure inspections, congestion management, while the company is burdened by the temporary suspension of toll stations and the collection of toll charges.

7.1 Environmental Policy and Management

Kentriki Odos aims at improving its environmental performance, and thus continues and enhances its environmental protection program that includes the following:



Assessment of environmental risks and drawing-up of action plans

Implementation of the annual traffic noise program

Implementation of the annual ambient air quality monitoring program through permanent measuring stations installed along the infrastructure

Regular briefings of employees on environmental issues

Submitting proposals and suggestions through special reports

Annual and half-year reports on compliance with the Authorised Environmental Terms and other contractual obligations for the protection of the environment so that areas where the desired goals have not been met be identified

Since 2015, the company has been certified according to the Environmental Management System based on the ISO 14001:2004 international standard, which entails the following:

Monitoring of compliance with the environmental legislation

Monthly inspection program to guarantee compliance with environmental terms

Monitoring of environmental goals

Wide range recycling program

Careful environmental aspect and impact study

Material and waste management program

During 2018, 8 internal environmental audits were conducted by the competent department according to our internal plan to ensure the implementation of processes and terms and to make improvements where deemed necessary.

7.2 Impacts from our Operation

Energy and Fuel Consumption

For the company, electricity is the main energy source used for its needs as regards heating and lighting in the company buildings and facilities.

| Energy Consumption (kWh) | 2018 | 2017 | 2016 |
|--|-------------|-------------|-----------|
| Electric energy for road light-
ing and buildings | 9,431,888.1 | 6,150,200.3 | 4,707,033 |
| Solar energy (for ERTs and irrigation) | 5,251.27 | - | - |

The operational needs of Kentriki Odos mainly relate to Diesel fuel consumption for its fleet of vehicles.

| | 2018 | | 2017 | | 2016 | |
|---------------------|------------------|----------------|------------------|----------------|------------------|----------------|
| Fuel (Litres) | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors |
| Gasoline | - | 3,292.19 | 1,730.1 | 15,682.7 | 505.0 | - |
| Diesel (Fleet) | 191,997.3 | 198,348.75 | 105,678.1 | 409,099.8 | 87,383.0 | - |
| Diesel (Generators) | 2,000 | 1,438.77 | - | 5,920.3 | - | - |
| LPG | - | - | - | 111,000 | - | - |

The quantities reported for Kentriki Odos Diesel (Generators) refer to fuel quantities renewed on an annual basis. The fuel that is not used within the year is pumped out and recycled by a certified contractor. Therefore, the quantities reported here do not accurately reflect actual consumption, as it is not possible to accurately record the annual quantity of fuel that has been consumed. The generators are used in case of power outage.

Raw Materials and Equipment

For the management of raw materials and equipment as well as the preservation, protection and saving of natural resources, Kentriki Odos strictly adheres to the provisions of the Authorised Environmental Terms of the Concession Project.

In the following table, the basic categories of raw materials and equipment necessary for our operation are presented.

Use of Raw Materials and Supplies

| Categories
of raw | | 2018 | | 2017 | | 2016 | |
|---------------------------|-----------------------------|------------------|----------------|------------------|----------------|------------------|----------------|
| materials
and supplies | Material (Kg) | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors |
| | Salt | - | 3,179,210 | - | 1,511,762.4 | - | 1,841,190 |
| | Sawdust | 950 | - | 900 | - | 1,000 | 350 |
| Raw Materials | Printing paper | 3,506.20 | 125 | 1,252.5 | 50 | 1,025 | - |
| Naw Materials | Paper (paper thermal rolls) | 9,051 | - | 1,728.7 | - | 5,781 | - |
| | Ink / Toners (pcs) | 36 | - | 32 | - | - | - |
| | | | | | | | |

The total amount of freon air conditioners used at the company's premises is estimated at 135 litres.

The printing paper we use is eco-friendly and made with a certified production process that is internationally certified.

Water Management

In order to meet its goals of efficient water management and savings, Kentriki Odos implements a number of measures such as:



implementation of a water pump operation program for recycling (covering irrigation needs, cleaning of the surrounding area and firefighting) and controlled watering of the greenery within the borders of the Concession project

cooperation with an ISO 14001: 2004 certified subcontractor for planting and maintenance of greenery at the Kentriki Odos facilities and along the motorway

installing state-of-the-art equipment for controlled water consumption in all parking and sanitary facilities of the Motorist Service Stations of the highway

reuse of treated wastewater from the Motorist Service Stations biological treatment plants.

| | 2018 | | 2 | 017 | 2016 | |
|--|------------------|----------------|------------------|----------------|------------------|----------------|
| Water Consumption (m³) | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors |
| Water Consumption (Buildings & Facilities – EYDAP) | 3,772 | | 1,268 | - | 237 | - |
| Drinking water (bottles) | 29.46 | 5.71 | 32.55 | 0.63 | 32 | 3 |
| Water from other sources (from drilling) | 180,000 | - | 20 | - | 74 | 0.09 |

The water quantities of 2017 and 2016 refer to drilling and not to consumed cubic meters of water. It is further noted that 2018 was the first full year of operation of the E65 Motorway. The amount of 180,000 m3 refers to total water consumption regarding the E65 Motorway and the A.TH.E. motorway.

Waste Management

Kentriki Odos has to officially submit information and data regarding its activities and all records that document the disposal method of its waste to the Hellenic Waste Management Registry of the Greek Ministry of Environment and Energy. In this context and in compliance with the legislation in force, the company develops its annual Waste Producer Report with objectivity and transparency.

The amounts relevant to Kentriki Odos are managed by authorised partners and involve waste amounts as are registered in the Hellenic Waste Management Registry, unless otherwise mentioned. The company's subcontractors undertake the duty to collect waste generated during the operation and maintenance of the motorway, and then transfer it to appropriately authorised locations or specific waste collection points according to the respective certified Alternative Waste Management Systems.

| | | 2018 | | 2017 | | 2016 | |
|-----------------------|--|------------------|----------------|------------------|----------------|------------------|----------------|
| Waste
Management | Material | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors | Kentriki
Odos | Subcontractors |
| Raw materials | Iron and steel (barriers, signs)
(Kg) | - | 21,500 | - | 31,850 | - | 34,820 |
| | Plastic (barriers, signs) (Kg) | - | - | - | - | - | 550 |
| | Lightbulbs (Kg) | 50 | - | 20 | - | - | - |
| | Mixed batteries (Kg) | 11 | - | - | - | 60 | - |
| | Batteries (Lead -Acid) (Kg) | 381.2 | - | 2,805 | - | - | - |
| Semi-
manufactured | Batteries (Ni-Cd) (Kg) | 2,300 | - | | | | |
| goods or parts | Spare parts (cables) (Kg) | - | - | 17 | - | - | - |
| | Computers / Electrical Appliances / Equipment (Kg) | 480 | - | 63 | - | - | - |
| | Tires (Kg) | 1,942 | - | 1,410 | - | 930 | - |
| | Engine gear box and lubrication oils (Lt) | 867 | 474.75 | 395 | 984.36 | 379 | 656.2 |
| Other waste | Animal tissue waste (Road
Kill) (Kg) | - | - | - | - | - | 577 |
| | Mixed municipal waste (Kg) | - | 129,254 | - | 92,901 | - | 86,580 |
| Other | Cuts residues (kg) | - | 19,500 | - | 36,000 | - | 11,500 |
| | | | | | | | |
| | | | | | | | |

Kentriki Odos does not import, export or process waste that is deemed hazardous. Moreover, its operational procedures forbid dumping liquid waste in water bodies and warn against leaks or spills that have an impact on the environment.

Greenhouse Gas Emissions

For the third year in a row, Kentriki Odos completed the study of its carbon footprint, taking into account direct and indirect greenhouse gas emissions.

More specifically, in 2018, the total emissions for the emissions scope 1 and 2 amounted to 6,256.2 tonnes and increased by 41% in comparison to 2017.

It is worth noting that in December 2018 an air pollution measuring station was installed in the Sofades Motorist Service Station under the Environmental Terms Approval Decision. The installation of the recording equipment (analysers, detectors, etc.) will be completed in 2019, from where the recording of pollutant indicators will commence.

Total CO₂ Emissions (tn)

| Emission sources | 2018 | 2017 | 2016 |
|--|---------|---------|----------|
| Direct emissions* from fuel consumption from own fleet (scope 1) | 512.2 | 251.9 | 205.8 |
| Indirect emissions** from electricity consumption (scope 2) | 5,744.0 | 4,186,5 | 3,204.10 |
| Total | 6,256.2 | 4,438,3 | 3,409.9 |

*Direct emissions sources for Kentriki Odos: fuel consumption (diesel, gasoline) from own fleet (scope 1)

**Indirect electricity sources for Kentriki Odos: third-party electricity purchase, which serves all the company's operations (buildings, toll stations, road lighting).

Intensity = 2018: 6.256,2/201=31,1 tCO₂/employee Intensity = 2018: 6.256,2/231=27,08 tCO₂/motorway km

Kentriki Odos Vehicles

Emission factors:

Heating oil: $0.002668 \text{ tCO}_2/\text{I}$, Diesel: $0.002668 \text{ tCO}_2/\text{I}$, Gasoline: $0.002429 \text{ tCO}_2/\text{I}$, LPG: $0.0015 \text{ tCO}_2/\text{,}$ Electricity: $0.609 \text{ tCO}_2/\text{MWh}$ Source: National Greenhouse Gas Inventory 2018

In order to reduce the environmental impact stemming from staff and product transfers (vehicle gas emissions), the company:

- organizes eco-driving trainings, and trains its drivers to comply with speed limits
- uses power fleet software through which it can control at any time the data of each vehicle (such as when vehicle service
 was last performed, timetable, certified garages), thereby reducing the environmental impact due to any possible mechanical
 malfunction.

0wn

Leased

| Corporate vehicles | 15 | 20 | | |
|--|---------------------------|-----------|---------|--|
| Kilometres covered | 2,233,00 | 2,233,006 | | |
| | 2 | 2018 | | |
| Corporate Fleet Data | Total
Kentriki
Odos | A.TH.E. | E65 | |
| Patrol vehicles | 8 | 6 | 2 | |
| Kilometres covered by patrol vehicles | 1,264,403 | 840,217 | 424,186 | |
| Intervention teams' vehicles | 7 | 2 | 5 | |
| Kilometres covered by intervention teams' vehicles | 258,378 | 72,149 | 186,229 | |
| Corporate fleet vehicles | 15 | 8 | 7 | |
| | | | | |

Kilometres covered by the corporate fleet

1,522,781

912,366 610,415

Road Traffic Noise Management

Acknowledging that the areas neighbouring the motorway are exposed to different levels of Road Traffic Noise, we run an annual Road Traffic Noise Monitoring Program that includes noise measurements at specific noise sensitive locations along the motorway that have the approval of the competent

state agency. The noise measurements are carried out in collaboration with the Laboratory of Environmental Acoustics of Transportation Works of the Department of Civil Engineering, University of Thessaly.

In 2018, a total of 1624-hour noise measurements took place:

9 noise measurements at the A.TH.E. motorway, at the Skarfia - Raches section

7 noise measurements at the E65 motorway, at the Xyniada - Trikala section

According to the results of the annual Road Traffic Noise Monitoring program in 2018, no exceedance of the permissible noise levels was observed, therefore it was not deemed necessary to conduct a special study on noise protection barriers nor were additional noise prevention measures required to be taken.

Biodiversity Protection

During the preparation of the Environmental Impact Studies for the location and layout of the motorway axis, the importance of biodiversity issues for each area affected by the project was recognized. Kentriki Odos has calculated all the factors related to the protection of biodiversity and has taken all necessary protective measures. The company has taken the following measures for the need for protection and effective management of ecosystems and habitats:

Construction of wildlife crossings in areas designated as habitats

Motorway fencing to prevent wildlife from entering the motorway

Construction of closed sewerage systems for the protection of sensitive areas (e.g. the Yliki lake and surrounding environmental habitats, and natural sources)

Planting of indigenous species for their preservation and the harmonisation of the project with the natural environment

Construction of pollutant retention tanks

Implementation of action plans to prevent any accidental pollution

Implementation of noise-protection actions

Planning of pilot programs to record and monitor the growth of micro fauna

Sections Natura 2000 Area

Skarfia - Thermopyles Spercheios valley and estuary – Maliakos Bay (GR2440002)

Thermopyles - Spercheios (excluding the bridge that is under construction by ERGOSE)

Spercheios valley and estuary – Maliakos Bay (GR2440002)

Lower Course and estuary of Spercheios River (GR2440005)

Spercheios – I/C Aghia Paraskevi Spercheios valley and estuary – Maliakos Bay (GR2440002)

I/C Aghia Paraskevi – I/C Aghia Marina Spercheios valley and estuary – Maliakos Bay (GR2440002)

The karst springs of Ag. Paraskevi are located 250m away from the project,

which are the main habitat of Pungitius Hellenicus, the rare and protected fish P.D.67/81

Sensitive environmental element of the area is the stork colony in the area between

the settlements of Ag. Paraskevi and Megali Vrysi.

Since the planning stage of the Concession Project and up to 2018, no incident with negative impacts on these areas has been recorded

Recycling System

Kentriki Odos commenced the Boosting Recycling Initiative in 2018, a project to redesign the corporate recycling system in order to develop and promote recycling (a) quantitatively, by achieving a higher percentage of diversion of materials from mixed waste; (b) qualitatively, by including new flows of recyclable materials and (c) geographically, by gradually covering the entire project.

The results were immediately visible and in 2018 we recycled 915 kg of materials (compared to 654 kg in 2017). The full

results of the reorganization of the recycling system will be visible next year as a full year will have elapsed since the new system has been implemented.

During 2019, there is a plan to expand the recycling system with the participation of drivers/users by placing bins for the recycling of plastic, glass, aluminium, tin-plate and paper at all parking spaces that have toilets along the motorways.

7.3 Investment in Environment Protection

Our interest in protecting the environment is also reflected in the annual provision of funds to implement our environmental policy. Total environmental expenditure for 2018 amounted to approximately €192,000. Specifically:

| Environmental Protection Projects | Investment (€) |
|---|----------------|
| Protection and maintenance of green spaces | 165,061 |
| Traffic Noise Monitoring Program | 2,500 |
| Environmental consultants and staff for monitoring the application of Environmental Terms | 14,080.2 |
| Equipment for air pollution monitoring | 6,297.07 |
| Certifications (ISO 9001:2015 / ISO 14001:2015) | 4,000 |
| Total | 191,938.27 |

7.4 Awareness Actions for the Protection of the Environment

In Kentriki Odos, we place particular importance on raising awareness as regards all those that are influenced by the company and its activities (our employees, motorway drivers, residents of the areas adjacent to our motorways, etc.).

As part of the internal actions to redesign the recycling system, printable recycling materials and waste management
instructions were shared with the recycling leaders of all company facilities so that they would be posted in public areas. In
addition, the recycling leaders and staff of the Nea Erythraia Headoffice building received e-mails with recycling tips so as to
recycle more accurately and efficiently.

| Connection to | | 2018 | | 2019 |
|--|--|--|-----------|--|
| the Sustainable
Development
Goals | Topic | Goal | Progress | Goal |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Annual Recertification | Annual Recertification:
ISO 14001:2015 | Completed | Annual
Recertification |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Measurement of CO ₂ emissions (Offices) | Measurement of CO ₂ emissions (Offices) | Completed | Measurement of CO ₂ emissions (Offices) |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Operation and maintenance activities | Zero fines | Achieved | Zero fines |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Recycling | Expansion of the recycling program | Completed | Extended restructuring of the recycling program to cover parking areas that have WC facilities along the motorway. |







COLLABORATION WITH LOCAL COMMUNITIES AND SOCIAL CONTRIBUTION

Primary Sustainable Development Goals



Secondary Sustainable Development Goals







3. GOOD HEALTH AND WELL-BEING



4. QUALITY



11. SUSTAINABLE CITIES AND COMMUNITIES



16. PEACE, JUSTICE AND STRONG INSTITUTIONS

. . . / (

In 2018:

granted 40,154 free passes for disabled vehicles invested €117,510 in social

initiatives and strategies

8.1 Our Contribution to Social Development

With our constant reference values being human- and local communities-centred, we are constantly enriching and enhancing programs and actions that focus on the social and economic development of local communities adjacent to the motorway.

In 2018, Kentriki Odos contributed towards social development the amount of €26,321.97 million.

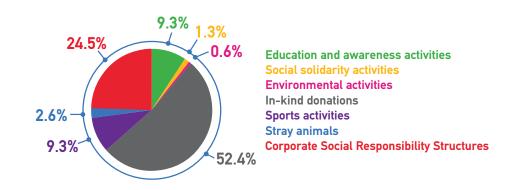
More specifically:

| Annual contribution to Social Development - Social Product (in th. €) | 2018 | 2017 | 2016 |
|--|-----------|-----------|-----------|
| Payments to suppliers (except materials and intercompany transactions) | 9,691.04 | 8,545.15 | 5,471.07 |
| Employee salaries and benefits (including insurance contributions) | 3,892.14 | 2,511.74 | 2,498.13 |
| Payments to providers of capital | 12,621.27 | 11,108.92 | 11,483.23 |
| In-kind support, financial support and donations (including investments in Corporate Social Responsibility Structures) | 117.52 | 115.67 | 79.61 |
| Total | 26,321.97 | 22,281.48 | 19,532.04 |

Kentriki Odos's key priorities cover the following areas:



In 2018, our total investment in our priority pillars amounted to €117,519.4 (compared to €115,671 in 2017).



Welfare and Social Solidarity Activities

Social welfare and solidarity actions have been a significant part in the Kentriki Odos strategic approach towards corporate responsibility. Supporting associations and bodies to provide services to vulnerable social groups is our priority.

In 2018, we continued supporting children, young people, people with special needs and social groups that do not have access to social structures, and we addressed specific requests of organizations such as granting a sponsorship for organizing a festival by the "Smile of the Child" organization.

Road Safety Training and Awareness Activities

In 2018, our total investment in training and awareness actions on road safety amounted to more than €10,965.

Interactive awareness and training actions in collaboration with the "Panos Mylonas" Hellenic Road Safety Institute:



Cycling Safely

The "Cycling Safely" program aims at shaping the road driving culture and behaviour and is addressed to children. The program aims at children acquiring a responsible driving behaviour which will shape their mentality and behaviour

as adults. The program has been approved by the Ministry of Education and the Institute of Educational Policy, and it is always implemented with the cooperation of the competent Directorates of Primary Education.

September 2018 to February 2019 were trained

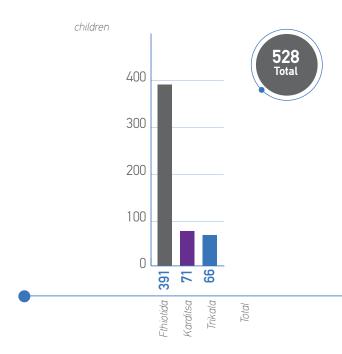








Students Participation by Prefecture



Student's Attitudes and Behaviours During the Program

| | USE OF | BIKES | USE OF PROTECTIVE HELMET | | | HOSPITALIZATION | | |
|------------|--------|-------|--------------------------|---------|-----------|-----------------|--------------------------|----------------|
| PREFECTURE | Yes | No | Always | Usually | Sometimes | Never | I don't have
a helmet | FROM BIKE FALL |
| Fthiotida | 45% | 55% | 18% | 12% | 23% | 17% | 30% | 9% |
| Karditsa | 95% | 5% | 3% | 11% | 11% | 25% | 50% | 12% |
| Trikala | 40% | 60% | 23% | 15% | 28% | 9% | 25% | 7% |
| Average | 60% | 40% | 14.7% | 12.7% | 20.7% | 17.0% | 35.0% | 9% |

Comments of students about the program:

"I liked the fact that they showed us how to wear a helmet"

"I learned about the dangers of cycling"

Teacher Assessment of the Training Program

Excellent Very much Fairly Moderate Response to goals and 69% 4% 0% expectations New knowledge / skills 65% 28% 6% 1% acquired Allocation of training 64% 28% 7% 1% time Quality and content of 72% 0% 24% 4% lectures Practical part of the 63% 29% 7% 1% training Use of equipment 58% 32% 9% 1% Overall satisfaction 69% 0%

Facilitators Assessment

| | Excellent | Very much | Fairly |
|------------------------------|-----------|-----------|--------|
| Satisfactory answers | 85% | 13% | 2% |
| Facilitator transmissibility | 86% | 11% | 3% |
| Knowledge of the subject | 89% | 9% | 2% |

"The kids worked in groups, played, discussed, got informed, solved their questions and understood how to safely ride the bike." (Teacher – 18th Primary School of Karditsa)

"A very interesting presentation, communicative, interactive; time flied pleasantly, and the children were not bored." (Teacher – 1st Primary School of Malesina)

Traffic Education Program "Do It Right"

The aim of the program is to educate lower and senior high school students in traffic issues.

The program includes theoretical and practical training using simulators and other equipment, unique in Greece. During the "Do It Right" program, students enjoy the opportunity, to attend experiential training on issues of road accident prevention, based on the best international practices. The program has been approved by the Ministry of Education and the Institute for Educational Policy.

During the reference year, more than 400 children from schools

in Karditsa and Boeotia were educated. Upon completion of the training program, questionnaires were given to record attitudes and behaviours on road safety before and after the training, as well as to evaluate the program as a whole by the students participating in the program.



| This training program helped me | Definitely yes | Probably yes | Probably no | Definitely not |
|--|----------------|--------------|-------------|----------------|
| to become a more conscious user of the road | 73% | 18% | 6% | 3% |
| to understand the causes
and consequences of traffic
accidents | 75% | 17% | 6% | 2% |
| to understand the importance of safe driving | 82% | 12% | 4% | 2% |

Taking Care of Stray Animals

Kentriki Odos cares for the safe, and smooth traffic flow and therefore has installed a special fencing along the entire motorway, for the protection of both animals and drivers.

In 2018, the company intensified its efforts to collect and manage stray animals. More specifically, 10 stray animals were collected and were hosted in a specially constructed area before they were picked up by the Animal Welfare Society.

In collaboration with the Animal Welfare Society, Kentriki Odos provided vet care and tests that included Kala-azar tests, Erhlichia and scabies treatments, anti–rabies vaccinations, orthopaedic surgeries/minor surgeries, x-rays, neutering, assessing/implanting tracking chips and covered the veterinary costs, whereas two puppies have now been adopted. Our total investment in 2018 amounted to €3,000.

In-Kind Donations

In 2018, Kentriki Odos continued to support people with special needs by offering toll free passes for special needs vehicles.

| Support for people with disabilities | 2018 | 2017 |
|---|-----------|----------|
| Free of charge passes of special needs vehicles | 40,154 | 31,620 |
| Investment (€) | 61,611.45 | 56,097.1 |

Corporate Social Responsibility Structures

Our goal in Kentriki Odos is to act as an active part of the whole community. In this context we ensure that:

we improve our internal structures

enhance our participation in international bodies and information conferences

we implement communication activities targeted to specific causes

In 2018, we invested nearly €29,000 to meet these needs.

8.3 Ethics and Corporate Communications

In Kentriki Odos, we respect the rules of professional conduct and ethical behaviour towards citizens, motorists - users of the motorway and towards all our stakeholders with whom we communicate and work. Complete, reliable and responsible information about the services we provide is our commitment to fully meet the needs of those who choose to use the motorway.

Following the provisions of the Hellenic Code of Advertising - Communication of the Communication Control Committee, the responsible communication and marketing practices we implement, ensure the validity of the communication material disseminated to the public through the channels we utilize. The Public Relations & Marketing Division, in collaboration with the Legal Department of the company, ensures the validity and proper communication of the messages we post about the road network and of advertising our services in order to

minimize possible misleading advertising and/or stereotypes, which might offend the motorway drivers and our associates.

Moreover, one of our major priorities is to provide drivers with timely and responsible information on accessibility, smooth traffic on the motorway and possible problems due to weather conditions. In this context, we follow the specifications set in the new edition of the Good Practice Guide for Dynamic and Permanent Signs and Displays (October 2018).

In 2018, no incident of non-compliance with the regulations and optional codes related to marketing, advertising, promotion and sponsorship services was recorded.

| Connection to | | 2018 | 2019 | |
|--|---|--|---|---|
| the Sustainable
Development Goals | Topic | Goal | Progress | Goal |
| 3. GOOD HEALTH AND WELL-BEING | Blood bank | Repeat blood collection | Has not taken place
since the 2017 blood
collection took place
end of 2017 | Repeat blood
collection for
employees of the
ATHE |
| 3. GOOD HEALTH AND WELL-BEING 17. PARTINERSHIPS FOR THE GOALS | Stray animal
management | Maintain
collaboration with the Greek
animal welfare company | Completed | Maintain
collaboration with
the Greek animal
welfare company |
| 1. NO POVERTY 3. GOOD HEALTH AND QUALITY EDUCATION 17. PARTNERSHIPS FOR THE GOALS | Strengthening
partnerships | Support social initiatives in local and national scale | Completed | Ongoing |
| 3. GOOD HEALTH ANDQUALITY 17. PARTNERSHIPS FOR THE GOALS | E-Learning
platform
dedicated to
Road Safety | Suitable synergies to enrich
the educational content of the
platform | Completed | Content
development in
order to pilot in 2020 |

GRI 203-1 88



9 REPORT PROFILE

The Kentriki Odos Corporate Responsibility Report for 2018 is the company's 4th Annual Report. It covers the period from 1/1/2018 to 31/12/2018 and focuses on all the key topics that the company has identified. The previous report was referring to year 2017 from 1/1/2017 till 31/12/2017. The company is committed to communicate its activities through a Corporate Responsibility Report on an annual basis.

Report Structure

The content of the Report is based on the strategic priorities identified. It covers the 5 pillars of Corporate Responsibility on which we rely our strategy and actions:

- Road Safety
- Quality in Services
- Human Resources
- Caring for the Environment
- Local Communities and Social Contribution

Our forth Corporate Responsibility Report is a continuation of our effort that began in 2014 with the release of our first report and aims to present and communicate our Corporate Responsibility strategy and its practical implementation. The Report is now a platform for dialogue that allows us to

communicate in a systematic, transparent and structured way to our stakeholders and to present our priorities, risks, opportunities and plans for the future.

International Standards

This report has been prepared in accordance with the GRI Standards: Core option.

Clarifications

Report Scope

This Report covers the operation and maintenance of the motorways and not their construction which is carried out by the EUROIONIA (TERNA - TERNA Energy) joint venture, on behalf of Kentriki Odos.

Accidents

The number of accidents excludes accidents involving seasonal employees who operate through an external company providing personnel and payroll services. We do not record data on absenteeism.

Suppliers

Local suppliers do not relate exclusively to the maintenance and operation of the motorway. National suppliers include suppliers from related parties, most important of which is the manufacturer EUROIONIA. The remaining related suppliers focus on the maintenance and operation of the motorway (power supply, E/M facilities maintenance, etc.).

Financial Information

On 11.12.2018, an authorized transfer of shares of the Concessionaire took place between the Initial Shareholders, in accordance with the provision of Article 9.3.2 (ii) (a) of the

Concession Agreement. In particular, the Initial Shareholder "FERROVIAL S.A." transferred to the Initial Shareholder "GEK TERNA HOLDING REAL ESTATE CONSTRUCTION S.A." all the shares of the Concessionaire that thry held, namely 21,671,001 registered shares. Following the above transfer, the Concessionaire's share capital is wholly owned (100%) by "GEK TERNA HOLDING REAL ESTATE CONSTRUCTION S.A."

For the Accounting year up to and including that ended December 31st, 2016, the company kept the accounting books and records and was drawing up its financial statements in accordance with the provisions of N. 4308/2014 "Greek Accounting Standards, Related Arrangements and Other Provisions". The transition date was January 1st ,2016 and to this end comparative figures are presented in accordance with IFRS for the year ended December 31st ,2016 as well as IFRS Statement of Financial Position at the transition date of January 1st ,2016. Information on the adjustments made during the transition from GAAP to IFRS is presented in the Company's Financial Statements.

Salaries and employees' benefits include employer contributions

Payments to the capital providers have been interpreted as The company in accordance with article 2 of N. 4308/2014 is interest payments to banks for loans taken and repaid.

considered to be a medium enterprise.

EXTERNAL ASSURANCE

For the 2018 report we decided to proceed to External Assurance of specific parts of the content in order to improve the reliability of the information provided and the structures that allow us to collect and process information. In the last section of this report, we present the Assurance letter of the independent assurer, Grant Thornton who carried out a limited level assurance of the specific data, in accordance with the international standard of verification ISAE 3000.

SUPPORT

The 2018 Corporate Responsibility Report was developed with the guidance and scientific support of Sustainability Knowledge Group. (www.sustainabilityknowledgegroup.com).

CSR TEAM

A number of executives from different Departments and Divisions of the company cooperated for the collection of data, in particular:

- Content Coordinators: Foteini Lamprou, Gerasimos Monokrousos
- Representatives of Departments/Divisions Content Managers: Nikos Katapodis, Eygenia Soufi, Konstantinos Sideris, Foteini Lamprou, Natalia Manara, Giannis Marinopoulos, Gerasimos Monokrousos, Eleni Nianiou, Anastasia Pnevmatikou, Panagiota Stasinou, Panagiota Tsaousi, Giorgos Mayrikos, Natali Kedikoglou, Katerina Katexi, Christina Nikolaou, Maria Zografini, Mixalis Lagoudakis, Magdalini Mparouxou, Giannis Sioutis, Stellios Simopoulos, Panagiotis Galanopoulos, Giannis Orfaniotis, Natalia Dasiou, Christos Bakaras and Antigoni Kazaneli.

CONTACT POINT

You can contact us for comments, questions or suggestions. Gerasimos Monokrousos Public Relations, Marketing & C.S.R. Associate Address: 19, Nea Erythraias Avenue, Varybobi, 146 71 Headquarters: 87 Themistokleous Str. Athens E-mail: gmonokrousos@neaodos.gr

Tel.: (+30) 210-3447300 Fax: (+30) 210-6100301







SUSTAINABLE DEVELOPMENT **GOALS IN OUR OPERATION**

Road Safety

Primary Sustainable **Development Goals**



3. GOOD HEALTH AND WELL-BEING



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



Secondary Sustainable **Development Goals**



3.6 By 2020, halve the number of global deaths and injuries from road traffic accidents.

3.6.1 Death rate due to road traffic injuries.

9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.

9.1.1 Proportion of the rural population who live within 2 km of an all-season road.

9.1.2 Passenger and freight volumes, by mode of transport.

11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.

11.2.1 Proportion of population that has convenient access to public transport, by sex, age and persons with disabilities.

17.17 Encourage and promote effective public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.

Quality Service Provision

Primary Sustainable **Development Goals**



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE

9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.

9.1.1 Proportion of the rural population who live within 2 km of an all-season road.

9.1.2 Passenger and freight volumes, by mode of transport.

Secondary Sustainable **Development Goals**



17.17 Encourage and promote effective public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.

Human Resources

Primary Sustainable **Development Goals**



8. DECENT WORK AND ECONOMIC GROWTH

8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young.

8.5.1 Average hourly earnings of female and male employees, by occupation, age and persons with disabilities.

8.5.2 Unemployment rate, by sex, age and persons with disabilities.

Secondary Sustainable **Development Goals**







5. GENDER EQUALITY





- .8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.
- 3.8.1 Coverage of essential health services (defined as the average coverage of essential services based on tracer interventions that include reproductive, maternal, new-born and child health, infectious diseases, non-communicable. diseases and service capacity and access, among the general and the most disadvantaged population).
- 3.8.2 Proportion of population with large household expenditures on health as a share of total household expenditure or income
- 4.7 By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship and appreciation of cultural diversity and of culture's contribution to sustainable development.
- 5.1 End all forms of discrimination against all women and girls everywhere.
- 5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.
- 5.5.1 Proportion of seats held by women in (a) national parliaments and (b) local governments.
- 5.5.2 Proportion of women in managerial positions.
- 10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
- 10.2.1 Proportion of people living below 50 per cent of median income, by sex, age and persons with disabilities.
- 10.3 Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.
- 10.3.1 Proportion of population reporting having personally felt discriminated against or harassed in the previous 12 months on the basis of a ground of discrimination prohibited under international human rights law.
- 16.7 Ensure responsive, inclusive, participatory and representative decision-making at all levels.

16.7.1 Proportions of positions (by sex, age, persons with disabilities and population groups) in public institutions (national and local legislatures, public service, and judiciary) compared to national distributions.

16.B Promote and enforce non-discriminatory laws and policies for sustainable development.

16.B.1 Proportion of population reporting having personally felt discriminated against or harassed in the previous 12 months on the basis of a ground of discrimination prohibited under international human rights law.

Caring for the Environment

Primary Sustainable **Development Goals**

12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.

12.5.1 National recycling rate, tons of material recycled.

12.8 By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.

13.1 Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries.

13.2 Integrate climate change measures into national policies, strategies and planning.

13.2.1 Number of countries that have communicated the establishment or operationalization of an integrated policy/ strategy/plan which increases their ability to adapt to the adverse impacts of climate change, and foster climate resilience and low greenhouse gas emissions development in a manner that does not threaten food production (including a national adaptation plan, nationally determined contribution, national communication, biennial update report or other).

13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.

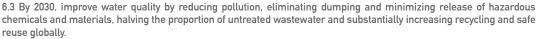
13.3.1 Number of countries that have integrated mitigation, adaptation, impact reduction and early warning into primary, secondary and tertiary curricula.

13.3.2 Number of countries that have communicated the strengthening of institutional, systemic and individual capacity-building to implement adaptation, mitigation and technology transfer, and development actions.

Secondary Sustainable **Development Goals**

3.9 By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

3.9.1 Mortality rate attributed to household and ambient air pollution.



6.B Support and strengthen the participation of local communities in improving water and sanitation management.

6.4.1 Change in water-use efficiency over time.

6.4.2 Level of water stress: freshwater withdrawal as a proportion of available freshwater resources.

7.3 By 2030, double the global rate of improvement in energy efficiency.

7.3.1 Energy intensity measured in terms of primary energy and GDP.

11.6 By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.

11.6.1 Proportion of urban solid waste regularly collected and with adequate final discharge out of total urban solid waste generated, by cities.

15.1 By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.

15.1.2 Proportion of important sites for terrestrial and freshwater biodiversity that are covered by protected areas, by ecosystem type.

15.5 Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species.

15.9 By 2020, integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts.

17.17 Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.



16. PEACE, JUSTICE AND STRONG INSTITUTIONS





GOOD HEALTH AND



. CLEAN WATER AND SANITATION



11. SUSTAINABLE CITIES
AND COMMUNITIES



Collaboration with Local Communities and Social Work

Development Goals



Primary Sustainable | 17.17 Encourage and promote effective public, public private and civil society partnerships, building on the experience and resourcing strategies of partnerships. 17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.



1.2 By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions.

1.2.1 Proportion of population living below the national poverty line, by sex and age

1.2.2 Proportion of men, women and children of all ages living in poverty in all its dimensions according to national defi-

3.6 By 2020, halve the number of global deaths and injuries from road traffic accidents.

3.6.1 Death rate due to road traffic injuries.







3. GOOD HEALTH AND



4. QUALITY



11. SUSTAINABLE CITIES



16. PEACE, JUSTICE AND

4.5 By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable situations.
4.5.1 Parity indices (female/male, rural/urban, bottom/top wealth quintile and others such as disability status, indigenous peoples and conflict-affected, as data become.

available) for all education indicators on this list that can be disaggregated.

4.A Build and upgrade education facilities that are child, disability and gender sensitive and provide safe, non-violent, inclusive and effective learning environments for all.

11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage.

11.4.1 Total expenditure (public and private) per capita spent on the preservation, protection and conservation of all cultural and natural heritage, by type of heritage (cultural, natural, mixed and World Heritage Centre designation), level of government (national, regional and local/municipal), type of expenditure (operating expenditure/investment) and type of private funding (donations in kind, private non-profit sector and sponsorship).

11.7 By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities.

11.7.1 Average share of the built-up area of cities that is open space for public use for all, by sex, age and persons with disabilities.

16.5 Substantially reduce corruption and bribery in all their forms.

16.6 Develop effective, accountable and transparent institutions at all levels.

16.6.1 Primary government expenditures as a proportion of original approved budget, by sector (or by budget codes or similar).

16.6.2 Proportion of population satisfied with their last experience of public services.







GRI CONTENT INDEX

For the SDG Mapping Service, GRI Services reviewed that the disclosures included in the content index are appropriately mapped against the SDGs.



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and promote sustainable agriculture;Achieve gende
equality and empower all women and girls;Ensure access |
| Economic
Performance | generated and distributed | | to affordable, reliable, sustainable and modern energy for all
8. Promote sustained, inclusive and sustainable economic
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| Economic
Performance | | 74 | to affordable, reliable, sustainable and modern energy for all 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; |
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| conomic
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| conomic
Performance | 201-2 Financial implications and other risks and opportunities due to climate change 201-3 Defined benefit plan obligations and other retirement plans | No financial assistance received from | to affordable, reliable, sustainable and modern energy for all 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; 13. Take urgent action to combat climate change and its |
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| | 203-2 Significant indirect economic impacts | 83, 84 | | 1. End poverty in all its forms everywhere; 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture 3. Ensure healthy lives and promote wellbeing for all at all ages; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 10. Reduce inequality within and among countries; 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development |
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76, 81, 90, 91 | | End poverty in all its forms everywhere; 5. Achieve gender
equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full
and productive employment and decent work for all; 16.
Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 20, 74-76 | | |
| GRI 301:
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| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34 | | |
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equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full
and productive employment and decent work for all; 16.
Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management | 20, 60, 75, 81 | | |
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Energy 2016 | approach 302-1 Energy consumption within the organization | 75 | | 7. Ensure access to affordable, reliable, sustainable and modern energy for all; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts |
| | 302-2 Energy consumption outside of the organization | 75 | | 7. Ensure access to affordable, reliable, sustainable and modern energy for all; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts |

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| | Biodiversity | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34 | |
| Approach 2016 | 103-2 The management approach and its components | 15, 19, 20, 27, 79,
80, 90, 91 | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 20, 79-81 | |
| GRI 304:
Biodiversity
2016 | 304-1 Operational sites owned,
leased, managed in, or adjacent to,
protected areas and areas of high
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| | 304-2 Significant impacts of activities, products, and services on biodiversity | 79, 80 | 6. Ensure availability and sustainable management of water and sanitation for all; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | 304-3 Habitats protected or restored | 79, 80 | 6. Ensure availability and sustainable management of water and sanitation for all; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | Emissions | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 26-34 | |
| | 103-2 The management approach and its components | 15, 19, 20, 27, 78,
81, 90, 91 | End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 78, 79, 81 | |
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|---|---|---------------------------------------|---|
| | 305-2 Energy indirect (Scope 2) GHG emissions | 78 | 3. Ensure healthy lives and promote wellbeing for all at all ages; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts;14. Conserve and sustainably use the oceans seas and marine resources for sustainable development 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | 305-4 GHG emissions intensity | 78 | 13. Take urgent action to combat climate change and its impacts;14. Conserve and sustainably use the oceans seas and marine resources for sustainable development 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combai desertification, and halt and reverse land degradation and halt biodiversity loss |
| | Effluents and Waste | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34 | |
| Approach 2016 | 103-2 The management approach and its components | 15, 19, 20, 27, 76,
77, 81, 90, 91 | End poverty in all its forms everywhere; 5. Achieve gender
equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full
and productive employment and decent work for all; 16
Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 76, 77, 81 | |
| GRI 306:
Effluents and
Waste 2016 | 306-1 Water discharge by quality and destination | 76, 77 | Ensure healthy lives and promote wellbeing for all at all
ages; 6. Ensure availability and sustainable management
of water and sanitation for all; 12. Ensure sustainable
consumption and production patterns; 14. Conserve and
sustainably use the oceans, seas and marine resources for
sustainable development |
| | 306-2 Waste by type and disposal method | 76, 77 | Ensure healthy lives and promote wellbeing for all at al
ages; Ensure availability and sustainable management
of water and sanitation for all; Ensure sustainable
consumption and production patterns |
| | 306-3 Significant spills | Didn't occured | 3. Ensure healthy lives and promote wellbeing for all at all ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | 306-4 Transport of hazardous waste | 77 | Ensure healthy lives and promote wellbeing for all at al
ages; 12. Ensure sustainable consumption and production
patterns; |
| | 306-5 Water bodies affected by water discharges and/or runoff | 77 | 6. Ensure availability and sustainable management of water
and sanitation for all; 15. Protect, restore and promote
sustainable use of terrestrial ecosystems, sustainably
manage forests, combat desertification, and halt and reverse
land degradation and halt biodiversity loss |
| | Environmental Compliance | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 20, 26-34 | |

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S) OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|--|--|---|
| | 103-2 The management approach and its components | AND/OR URL(S) 15, 19, 20, 27, 74, 75, 81, 90, 91 | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 20, 81 | |
| GRI 307:
Environmental
Compliance
2016 | 307-1 Non-compliance with environmental laws and regulations | 20, 81 | 16. Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | Supplier Environmental Assess | ment | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 26-34 | |
| | 103-2 The management approach and its components | 15, 19, 27, 57-60,
81, 90, 91 | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels. |
| | 103-3 Evaluation of the management approach | 57-60 | |
| GRI 308:
Supplier
Environmental
Assessment
2016 | 308-1 New suppliers that were screened using environmental criteria | 20, 58 | |
| 2010 | 308-2 Negative environmental impacts in the supply chain and actions taken | 58 | |
| SOCIAL | Frankrimanst | | |
| GRI 103:
Management | Employment 103-1 Explanation of the material topic and its Boundary | 26-34 | |
| Approach 2016 | 103-2 The management approach and its components | 15, 19, 20, 27, 62-
64, 72, 90, 91 | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | | | |
| | 103-3 Evaluation of the management approach | 64, 72 | |

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| | | NUMBER(S) OMISSION
AND/OR URL(S) | SDG LINKAGE TO DISCLOSURE |
|---|---|---|--|
| | 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees | 68 | 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | 401-3 Parental leave | 68 | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | Occupational Health and Safety | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 26-34 | |
| | 103-2 The management approach and its components | 10, 11, 15, 27, 19,
20, 65, 72, 90, 91 | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 15, 19, 65 | |
| GRI 403:
Occupational
Health and | 403-1 Workers representation in formal joint management–worker health and safety committees | 69, 70 | |
| Safety 2018 | 403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities | 69, 70 | |
| | 403-3 Workers with high incidence or high risk of diseases related to their occupation | 69, 70 | |
| | 403-4 Worker participation,
consultation, and communication on
occupational health and safety | 70 | |
| | 403-5 Worker training on occupational health and safety | 71 | |
| | 403-6 Promotion of worker health | 69, 70 | |
| | 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 2. | 71 | |
| | 403-8 Workers covered by an occupational health and safety management system | 70 | |
| | 403-9 Work-related injuries | 69 | |
| | 403-10 Work-related ill health | 71 | |
| | Training and Education | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 26-34 | |

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| GRI STANDARD | DISCLOSURE | PAGE NUMBER(S) AND/OR URL(S) | MISSION | SDG LINKAGE TO DISCLOSURE |
|---|--|--|---------|---|
| | 103-2 The management approach and its components | 15, 19, 20, 27, 65-
68, 71, 72, 90, 91 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and built effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 65-68, 71, 72 | | |
| GRI 404:
Training and
Education 2016 | 404-1 Average hours of training per
year per employee | 67 | | 4. Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all; 5. Achieve gender equality and empower all women and girls; 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | 404-3 Percentage of employees receiving regular performance and career development reviews | 65, 72 | | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | Diversity and Equal Opportunity | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34 | | |
| Approach 2016 | 103-2 The management approach and its components | 10, 11, 15, 27, 19,
20, 65, 72, 90, 91 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 15, 19, 65 | | |
| GRI 405:
Diversity
and Equal
Opportunity | 405-1 Diversity of governance bodies and employees | 15, 19, 65 | | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| 2016 | 405-2 Ratio of basic salary and remuneration of women to men | 65 | | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 10. Reduce inequality within and among countries |
| | Non-discrimination | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34 | | |
| Approach 2016 | 103-2 The management approach and its components | 10, 11, 15, 19, 20,
27, 62, 65, 72, 90,
91 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, ful and productive employment and decent work for all; 16 Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | | | | |
| | 103-3 Evaluation of the management approach | 65 | | |

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| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|---|--|----------|--|
| | Local Communities | | | |
| GRI 103: | 103-1 Explanation of the material | 26-34 | | |
| Management
Approach 2016 | topic and its Boundary 103-2 The management approach and its components | 10, 11, 15, 19, 20,
27, 59, 83, 89-91 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all, 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 59, 83 | | |
| GRI 413: Local
Communities
2016 | 413-1 Operations with local community engagement, impact assessments, and development programs | 83-87 | | |
| | 413-2 Operations with significant actual and potential negative impacts on local communities | 83-87 | | End poverty in all its forms everywhere; 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture |
| | Customer Health and Safety | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34 | | |
| Approach 2016 | 103-2 The management approach and its components | 10, 11, 15, 19, 20,
27, 36, 90, 91 | | 1. End poverty in all its forms everywhere; 5. Achieve gender
equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full
and productive employment and decent work for all; 16
Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 36-40, 43-46 | | |
| GRI 416:
Customer
Health and
Safety 2016 | 416-1 Assessment of the health and safety impacts of product and service categories | 38-46 | | |
| | 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services | 9, 20 | | 16. Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | Marketing and Labeling | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 26-34, 52-54 | | |
| Approach 2016 | 103-2 The management approach and its components | 10, 11, 15, 19, 20, 27, 50, 90, 91 | | 1. End poverty in all its forms everywhere; 5. Achieve gender
equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full
and productive employment and decent work for all; 16.
Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 37, 43, 89 | | |
| GRI 417:
Marketing
and Labeling
2016 | 417-1 Requirements for product and service information and labelling | 37, 43 | | 12. Ensure sustainable consumption and production
patterns; 16. Promote peaceful and inclusive societies for
sustainable development, provide access to justice for all
and build effective, accountable and inclusive institutions at
all levels |
| | 417-2 Incidents of non-compliance concerning product and service information and labeling | 9, 20, 89 | | 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 417-3 Incidents of non- | 9, 20 | | |

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Independent Limited Assurance Report

To the Board of Directors of AFTOKINITODROMOS KENTRIKIS ELLADAS CONCESSION SOCIETE ANONYME

The Board of Directors of AFTOKINITODROMOS KENTRIKIS ELLADAS CONCESSION SOCIETE ANONYME" ("Odos Kentrikis Elladas S.A.") (the "Company") engaged "GRANT THORNTON S.A. CHARTERED ACCOUNTANTS MANAGEMENT CONSULTANTS" ("Grant Thornton") to review selected data included in the 2018 Corporate Responsibility Report of Odos Kentrikis Elladas S.A. for the fiscal year ended on December 31st, 2018 ("selected data"), in accordance with the Global Reporting Initiative (GRI) Standards ("GRI-Standards").

Scope

We performed our engagement in accordance with International Standard on Assurance Engagements 3000, Assurance Engagements other than Audits or Reviews of Historical Financial Information ("ISAE 3000"), in order to provide limited level assurance opinion on selected data of the 2018 Corporate Responsibility Report, with regard to:

| The completeness and accuracy of quantitative data and the plausibility of statements related |
|---|
| to GRI 102: General Disclosures. |
| The "In accordance" – Core adherence related to GRI Standards. |

- □ The completeness and accuracy of Disclosures on Management Approach, which correspond to seven (7) material issues: "Economic Performance", "Energy", "Emissions", "Employment", "Training and Education", "Local Communities" and "Customer Health and Safety".
- The completeness and accuracy of the GRI Topic specific Standards on the previous seven material issues (Disclosures 201-1, 302-1, 305-1, 305-2, 401-1, 404-1, 404-3, 413-2, 416-1).

Management Responsibility

The Management of Odos Kentrikis Elladas S.A. is responsible for the preparation and presentation of the selected data provided to us, as incorporated in the 2018 Corporate Responsibility Report of the Company, as well as for the completeness and accuracy of the selected data. Furthermore, the Management is responsible for maintaining records and adequate internal controls that are designed to support the reporting process.

Grant Thornton Responsibility

Our responsibility is to carry out a limited assurance engagement and to express our conclusions based on the procedures carried out for the selected data, as described in the "Scope" section.

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The procedures we carried out were designed to provide limited assurance, as specified by ISAE 3000, based on which we shaped the conclusion to our engagement.

These procedures are not as extensive as those required for providing reasonable assurance; consequently, a lower level of assurance is obtained.

Our responsibility is limited to the information related to the fiscal year that ended on December 31, 2018, as these were included in the 2018 Corporate Responsibility Report of the Company.

To the extent it is permitted by the legislation in force, we neither accept nor assume any responsibility for our engagement or this report towards anyone other than the Company, unless the terms have been agreed explicitly in writing, with our prior consent.

Limitations

- To conduct our work, we relied exclusively on the information provided to us by the Company's executives, which we accepted in good faith as being complete, accurate, real and not misleading. Therefore, we did not submit it to any verification procedures, apart from the procedures explicitly stated in our Report and which arise from our mutually agreed methodology.
- Our engagement was limited to the Greek version of the 2018 Corporate Responsibility Report. Therefore, in the event of any inconsistency in translation between the Greek and English versions, as far as our conclusions are concerned, the Greek version of the Report prevails.
- No work has been conducted on data for previous reporting periods, as well as on data related to forecasts and targets.
- □ No work has been conducted on anything other than the agreed scope and consequently, our opinion is limited to that scope.

Work conducted

We conducted our work so as to collect all the data, relevant documentation, information and explanations we considered necessary as to the selected data described in the "Scope" section. The procedures followed with regard to the selected data included:

| Interviews with executives and key personnel responsible for the relevant information at | nd |
|--|----|
| assumptions. | |

- □ Visits to the Company premises.
- □ Review and assessment of the processes and controls used to collect, aggregate, validate and report the data;
- □ Sample tests on collected data, conversion factors and formulas, where required.
- Review of the GRI Content Index found on pages 97-105 of the Corporate Responsibility Report, as well as the relevant references included therein, against our scope of work.

Independence

Grant Thornton implements the requirements of International Standard on Quality Control 1. Based on this, it maintains an integrated quality control system that includes policies and procedures for compliance with moral principles, professional standards and relevant legal and regulatory requirements. We comply with the independence requirements and other ethical standards of the IFAC Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, impartiality, professional adequacy, confidentiality and professional conduct. In this context, the assurance team is independent from the Company and has not participated in the preparation of the Company's 2018 Corporate Responsibility Report.

Conclusion

We report the following conclusions based on the scope and the limitations of our engagement. Our conclusions are based on the procedures we carried out, as described in the "Work Conducted" section:

Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that the quantitative data of the Report that relates to the GRI 102: General Disclosures is incomplete. Nothing has come to our attention that, under the scope of our engagement,

would cause us to believe that errors or inaccuracies exist both in the collation of the quantitative data and in the transposition of this data to the Report. Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that errors or inaccuracies exist in the GRI 102: General Disclosures that would significantly affect the ability of stakeholders to extract suitable and valid conclusions for the Company's performance. Nothing has come to our attention that would cause us to believe that the Report does not meet the requirements of the "In accordance" – Core ontion

the requirements of the "In accordance" – Core option.

Nothing has come to our attention regarding inaccuracies as to the completeness and accuracy

of the Disclosures on Management to the seven (7) material aspects under the scope of our engagement.

Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that the quantitative data of the Report that relates to the 201-1, 302-1, 305-1, 305-2, 401-1, 404-1, 404-3, 413-2 and 416-1, disclosures on seven (7) material aspects of GRI Standards, are incomplete. Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that errors or inaccuracies exist with regard to the aforementioned disclosures both in the collation of the quantitative data and in the transposition of this data to the Report. Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that inaccuracies exist in the aforementioned disclosures that would significantly affect the ability of interested parties to extract suitable and valid conclusions for the Company's performance.

Athens, 12/12/2019

The Chartered Accountant

Maria Eleni Bouzoura

CPA (GR) Reg. No.30511



Chartered Accountants Management Consultants 56, Zefirou str., 175 64 Palaio Faliro, Greece Registry Number SOEL 127

