



Doxiadis Associates

QUALITY POLICY

The scope of the Environmental Management of DOXIADIS ASSOCIATES CONSULTANTS ON DEVELOPMENT AND EKISTICS S.A. (Doxiadis Associates) includes the following activities:

Planning / Design, Provision of Consulting, Project Management and Supervision Services in the fields of Architecture, Civil Engineering Works, Infrastructure Works (Roads, Airports, Maritime, Hydraulics,), Urban and Regional Planning, Topo - Survey / Geographical Information Systems (including the Production and Distribution of Geographical Digital Data), Forest Studies, Environmental Studies.

Under this framework and with regard to the above-mentioned scope, the top management is committed to:

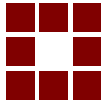
- ✓ customer satisfaction,
- ✓ meet legal requirements (European Directives, Greek Legislation etc.),
- ✓ the implementation and continuous improvement of the quality management system

Within the framework of the above commitment, Doxiadis Associates sets the following measurable Quality Objectives:

- ✓ have the fewest possible non-conformities (system, products/services provided, Certification Body),
- ✓ achieve the satisfaction of its customers' requirements and needs for the products/services produced (the customer satisfaction survey always has a better positive result than the last time it was conducted),

In order to achieve the above objectives, the office implements a Quality Management System that complies with the requirements of the International Standard EN ISO 9001:2015.

The quality objectives will be reviewed with the aim of continuous improvement of the Quality Management System according to ISO 9001:2015.



The management is committed to provide all the necessary material means and human resources to achieve its objectives and all staff are obliged to follow the procedures and instructions resulting from the implementation of the Quality Management System.

ATHENS, 08-09-2023

Georgia Sakarellou

Chief Executive Officer



Doxiadis Associates

ENVIRONMENTAL MANAGEMENT POLICY

The scope of the Environmental Management of DOXIADIS ASSOCIATES CONSULTANTS ON DEVELOPMENT AND EKISTICS S.A. (Doxiadis Associates) includes the following activities:

Planning / Design, Provision of Consulting, Project Management and Supervision Services in the fields of Architecture, Civil Engineering Works, Infrastructure Works (Roads, Airports, Maritime, Hydraulics,), Urban and Regional Planning, Topo - Survey / Geographical Information Systems (including the Production and Distribution of Geographical Digital Data), Forest Studies, Environmental Studies.

Recognizing that the principles of sustainable development, apart from legislative requirements, constitute a fundamental prerequisite for sound business, the company incorporates environmental criteria into its environment and processes and develops policies for the continuous improvement of its environmental performance, the management of environmental-climatic risk, the reduction of its environmental footprint, the strengthening of green business, and the protection of biodiversity.

As part of its commitment to:

- the continuous reduction of the environmental impact of its operation; and
- compliance with legislative and regulatory requirements for environmental protection

the company monitors and measures its environmental performance, sets improvement targets, implements and evaluates environmental management actions, such as energy and water saving programs, waste management and recycling, reducing travel and promoting green procurement, as ensured by the implementation of an Environmental Management System according to EN ELOT 14001:2015.



The company is committed to:

- the continuous improvement of its environmental management system in order to improve its environmental performance,
- the continuous training of its staff on the objectives and results of its environmental actions aimed at improving the quality of life, and
- supporting initiatives of third party non-profit bodies, organisations or institutions that provide added value for the benefit of people and the environment.

ATHENS, 08-09-2023
Georgia Sakarellou

Chief Executive Officer



Doxiadis Associates

HEALTH AND SAFETY POLICY

The Health and Safety of employees is the first priority of DOXIADIS ASSOCIATES CONSULTANTS ON DEVELOPMENT AND EKISTICS S.A. (Doxiadis Associates) for all its activities. There is a clear commitment of the company management to:

- establish and provide working conditions that ensure the health and safety of both its staff and persons who may be affected by its operations,
- take all appropriate safety measures to prevent accidents at work and minimise occupational hazards,
- provide all staff with the necessary equipment, personal protective equipment, information and training to carry out their work without accidents,
- meets the requirements of existing legislation on occupational health and safety,
- consult with staff on occupational health and safety issues and take account of proposals for continuous improvement of working conditions.

Personnel are responsible for applying all prescribed means, measures and precautions for the health and safety of themselves and any other persons likely to be affected by the work being carried out, and to use personal protective equipment as prescribed when visiting works under construction.

Finally, the company implements a Total Management System in accordance with the requirements of the ISO 45001 standard for the management of all issues related to occupational health and safety. It provides the necessary resources and support to continuously improve the system by adopting health and safety objectives and monitoring their achievement.

This policy is communicated to all company personnel, is available to all interested parties and is reviewed annually.

Athens, 21/01/2022

Georgia Sakarellou

President and CEO



Doxiadis Associates

POLICY

**ON PREVENTING AND COMBATING VIOLENCE AND
HARASSMENT AT WORK**

&

**ON THE MANAGEMENT OF INTERNAL COMPLAINTS CONCERNING
INCIDENTS OF VIOLENCE AND HARASSMENT**



1. The company DOXIADIS ASSOCIATES CONSULTANTS ON DEVELOPMENT AND EKISTICS S.A. (hereinafter referred to as DOXIADIS ASSOCIATES) complies with all measures and obligations relating to the application of the provisions of Part II of Law no. 4808/2021 on the prevention and treatment of all forms of violence and harassment, including gender-based violence and harassment and sexual harassment.

The purpose of this policy is to create and consolidate a working environment that respects, promotes and safeguards human dignity and the right of every person to a world of work free from violence and harassment.

DOXIADIS ASSOCIATES declares that it recognizes and respects the right of employees to a working environment free of violence and harassment and that it does not tolerate any such behavior, in any form and by any person. For this reason, the company undertakes to adopt every possible way to prevent and combat incidents of violence and harassment within its workplace with respect for human dignity.

This policy is adopted in accordance with Articles 9 and 10 of Law No. 4808/2021 and the regulatory legislation pursuant thereto and covers the persons referred to in par. 1 of article 3 of Law No. 4808/2021. In particular, DOXIADIS ASSOCIATES takes the following actions:

A. On preventing and combating violence and harassment at work

(a) assess the risks of violence and harassment at work by conducting an autopsy of its workplaces, but also taking into account factors such as the proportion of the population of workers, gender, age and other characteristics that may constitute grounds for discrimination against workers. At the same time, it assesses the risks relating to specific groups of its employees (such as night watchmen, new recruits, victims of domestic violence).

(b) take measures to prevent, control, mitigate and address the above risks, as well as to monitor relevant incidents or patterns of behaviour.

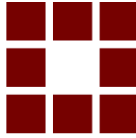
In particular, the company encourages employees to maintain a working environment where respect for human dignity, cooperation and mutual assistance are core values.

Each head of the company's individual departments is charged with the obligation to monitor and control any relevant incidents of violence and harassment within his/her department, while he/she must constantly be in open communication with the employees within the department.

Furthermore, the company takes technical measures to improve the lighting of all its premises, technical surveillance in its main areas, in compliance with the provisions of the law, in order to enhance the sense of security of its employees.

Finally, the company evaluates on a regular basis the effectiveness of the above preventive and mitigation measures and revises or updates the assessment of the above risks and measures.

(c) undertake actions to inform and raise awareness among its staff of the risks of violence and harassment. The company declares zero tolerance to any phenomena of violence and harassment and undertakes to provide its staff with information and information in accessible



formats, as well as to organise targeted meetings of its staff to discuss relevant issues and to address potential risks in a timely manner.

(d) provide information on the rights and obligations of employees and the employing company, as well as of persons exercising managerial authority or representing the company, to the extent and to the extent of their responsibility, in the event of the occurrence, reporting or reporting of such incidents, and on the procedure to be followed in this respect. In particular, the company informs employees of the rights and legal possibilities available to an aggrieved person, including the right to judicial protection, to file a complaint and a request for an industrial dispute with the Labour Inspectorate within the scope of its statutory powers, to report to the Ombudsman also within the scope of its statutory powers, and to file a complaint to the competent body of the company in accordance with the policy for the management of complaints.

e) appoints Mr **Vlasis Vassiloglou** as a reference person ("liaison") for the guidance and information of employees regarding the prevention and treatment of violence and harassment at work. His/her role is informative and consists of guiding and informing employees, whether or not they contact him/her in response to an incident of violence and harassment or a complaint. Employees have open, easy and direct access to him, **either in person or by telephone on 6944 63 62 56 or by e-mail at vasiloglou@doxiadis.com**.

(f) Ensure employment protection and support for workers who are victims of domestic violence, to the extent possible, by any appropriate means or reasonable accommodation. In particular, the company shall demonstrate in practice its support for the above category of employees by providing flexible working arrangements at the request of the employee victim of domestic violence, in order to support the employee in maintaining his/her employment and smooth reintegration after similar incidents.

B. Regarding the procedure for receiving and examining complaints

a) Communication channels - competent persons

The **person** responsible within the company to receive, examine and manage the complaints or complaints of the affected persons about violence and harassment is Mrs. Georgia Sakarellou, who can be contacted either in person, by telephone at 6973988514, or by sending an e-mail to sakarellou@doxiadis.com. The latter informs the person concerned of the possibility, at any stage of the procedure followed within the company, of also lodging a complaint with the competent administrative authorities within their competence, namely the Labour Inspectorate and the Ombudsman, as well as with the judicial authorities of their choice.

(b) investigate and examine complaints impartially and protect the confidentiality and personal data of victims and complainants. The company and the person in charge of the above are committed to receive, investigate and manage promptly any such complaint, to investigate and examine the complainants, and to take prompt action to protect the aggrieved party. In the exercise of their above duties, they must act impartially and respect the confidentiality and protection of the Personal Data (PDP) collected.

(c) observe the prohibition of retaliation against the person concerned. The company supports employees in reporting incidents of violence and harassment they have suffered and takes all appropriate measures to protect them effectively.

(d) identify and describe the consequences in the event of violations being found. The company, after assessing the gravity of the complained incident and in cooperation with the affected person,



may take adverse measures against the complainant, such as recommending compliance, changing his/her position, working hours, place or manner of work or even terminating his/her employment or cooperation with the company, without prejudice to the prohibition of abuse of rights in Article 281 of the Civil Code.

(e) cooperate and provide any relevant information to the competent authorities on request. In particular, the company and the person responsible for receiving and managing relevant complaints at the company level shall cooperate with any competent public, administrative or judicial authority which, either on its own initiative or at the request of the affected person, within the scope of its competence, requests the provision of data and information and undertake to provide assistance and access to such data. To this end, all information gathered, in whatever form, shall be kept in a relevant file, subject to the provisions of Law No. 4624/2019.

For Doxiadis S.A.

Georgia Sakarellou
Chief Executive Officer



Doxiadis Associates

CORPORATE INFORMATION SECURITY POLICY

Doxiadis Associates Consultants on Development and Ekistics S.A. carries out all its activities, in order to serve the needs and expectations of its customers in the most efficient and safe way and takes into account the applicable standards, legislation, regulations, as well as their implementation instructions in all activities and is committed to complying with them.

The activities of the Doxiadis Associates are:

Planning / Design, Provision of Consulting, Project Management and Supervision Services in the fields of Architecture, Civil Engineering Works, Infrastructure Works (Roads, Airports, Maritime, Hydraulics,), Urban and Regional Planning, Topo – Survey / Geographical Information Systems (including the production and distribution of Geographical Digital Data), Forest Studies, Environmental Studies.

The physical security of the facilities, personnel, documents, software, and vulnerable materials is ensured by the company in accordance with the relevant policies and procedures.

The heads of the Departments are responsible for the appropriate training of the staff so that they are able to use in the safest and most efficient way the assets of the company that are available to them to carry out their work.

Risk assessment is a repetitive effort and takes into account the contribution of each element to the company's mission, weaknesses, risks, impact of potential risks, single point failures, method of quantification and risk assessment, ways to reduce impact through application of mitigation measures.

Specifications for the supply of new or for the expansion of existing systems also include security requirements depending on the mission they perform or are about to perform.

Access to the corporate network, as well as the devices that are interconnected to it is controlled. The corporate network is protected by known or unknown malware. Files that contain security features against malicious software are updated frequently and automatically. The system protects, among other things, servers, workstations, and remote computers. A centrally controlled system protects the internal network from the Internet. The company has a Business Continuity Plan and maintains its applicability.

Finally, the company is committed to the continuous improvement of the Information Security Management System according to ISO 27001: 2013 with which it complies.

Athens, 02/08/2022
Georgia Sakarellou

Chief Executive Officer

Document Revision: 2.0,
Date: 02.08.2022



Doxiadis Associates

ANTI-BRIBERY POLICY

It is our policy to conduct all our activities in an honest and ethical manner. We adopt a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business transactions and relationships wherever we operate and by implementing and enforcing effective anti-bribery systems.

This policy applies to all individuals working at all levels and ranks, including the Board, directors, employees (permanent, temporary or appointed), consultants, subcontractors, seconded staff, home workers, casual workers, sponsors or any other person associated with us, or any of our affiliated companies or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribery
- Gifts and hospitality
- Gifts and hospitality
- Political contributions
- Charitable contributions

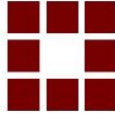
For all of the above cases, detailed Guidelines for the implementation of the Policy have been issued.

We will comply with all laws related to anti-bribery and anti-corruption in all jurisdictions in which we operate. However, we remain bound by the laws in Greece with respect to our conduct both domestically and abroad.

We are committed to meeting all the requirements of the ELOT EN ISO 37001:2017 standard and to the continuous improvement of our Anti-Bribery Management System.

Athens, 08/09/2023
Georgia Sakarellou

Chief Executive Officer



Doxiadis Associates

ANTITRUST POLICY

The Company and its employees will strictly comply with all applicable antitrust laws and with the Company's antitrust policies and procedures. Antitrust laws are complex and may involve:

1. Interactions with competitors,
 2. Transactions,
 3. Competition information,
 4. Trade associations,
 5. Agreements with customers & suppliers
- etc.

When issues arise, you should review the Company's Antitrust Compliance Manual and seek the advice of the Compliance Operations Officer.

Athens, 08/09/2023
Georgia Sakarellou

Chief Executive Officer



Doxiadis Associates

BUSINESS CONTINUITY POLICY

DOXIADIS ASSOCIATES CONSULTANTS ON DEVELOPMENT AND EKISTICS S.A. (Doxiadis Associates) recognizes the need to ensure the smooth and uninterrupted operation of the company for the benefit of its customers, shareholders and other stakeholders and has implemented a Business Continuity Management System (BCMS), in accordance with the international standard for business continuity ISO 22301:2019.

The activities of Doxiadis Associates are:

Planning / Design, Provision of Consulting, Project Management and Supervision Services in the fields of Architecture, Civil Engineering Works, Infrastructure Works (Roads, Airports, Maritime, Hydraulics,), Urban and Regional Planning, Topo - Survey / Geographical Information Systems (including the Production and Distribution of Geographical Digital Data), Forest, Environmental Studies.

Doxiadis Associates sets strategic and regular business continuity objectives, has the necessary resources to achieve them, and regularly monitors and evaluates them to ensure their continued relevance.

The Company takes into account the applicable standards, legislation, regulations and guidelines for their application in all its activities, is committed to their satisfaction and compliance with the ISO 22301:2019 standard, as well as to the continuous improvement of the Business Continuity Management System and has the necessary resources for this purpose.

This policy is reviewed on a regular basis, as well as in the event of significant changes, to ensure its continued validity and application.

Athens, 02/08/2022

Georgia Sakarellou

Chief Executive Officer