

Code of Ethics

Our Mission

Our mission is to consistently provide optimal services and to expand the perspectives of the energy market in Greece, creating long-term value for the shareholders and the stakeholders.

Our goal is to develop the distribution network even in the most remote areas and to ensure equal access to Distribution Users and end consumers while ensuring the safe and uninterrupted operation of the infrastructure.

The pillars underpinning our strategy embody our values and are summarized in actions to address climate change, to contribute to social prosperity and deploy our operational excellence in the light of the energy transition.

We are leaders in the **gas distribution activity** and our mission is to contribute to the National and European Energy & Climate goals, driving the country's energy transition for the decarbonization of the economy.

At the core of our strategic planning lies the deployment of sustainable infrastructure focusing on digitization and innovation, and supporting the EU goals set out in the **REPowerEU action plan** to diversify supply sources, integrate renewable gases and ensure affordable energy.

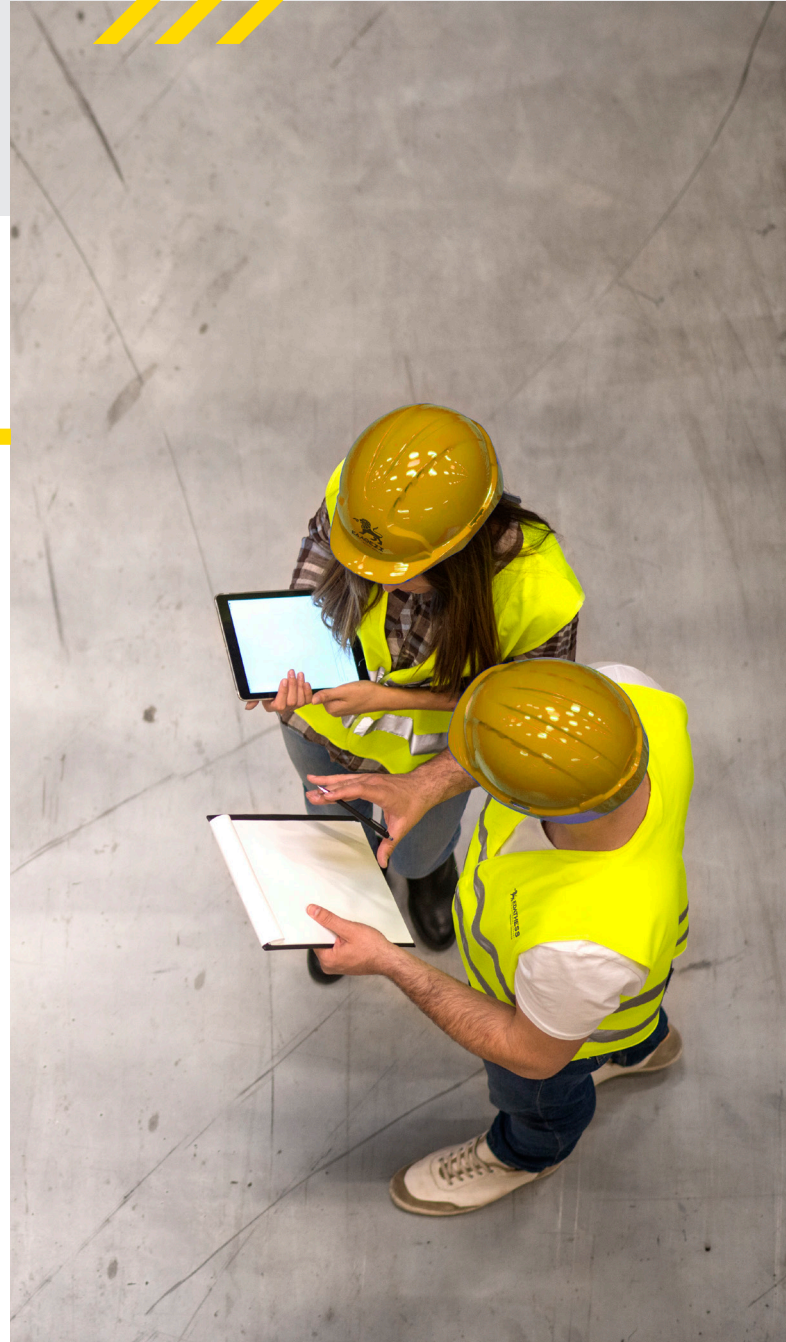
Our contribution to shaping best practices and policies for the benefit of consumers and the natural gas market is our practical commitment to a sustainable energy future.





Our Commitment

EDA THESS, as a Natural Gas Distribution Network Operator, is committed to contributing to the **Sustainable Development Goals (SDGs)** within the scope of its responsibilities, and to support a socially just energy transition that will benefit consumers and at the same time achieve zero carbon emissions.







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INTRODUCTION

Our Values

Our core values and principles dictate our company philosophy, guide our operations and decision-making processes while setting standards related to corporate ethics and professional conduct:

- Integrity, Impartiality & Transparency
- Sustainability
- Equal treatment of Distribution Users, Counterparties in Connection Contracts and End Consumers.
- Respect and Protection of Human Rights
- Team spirit and collaboration
- Corporate social responsibility
- Operational Excellence
- Innovation

We carry out our daily activities with responsibility, equity, fairness and good faith, fully complying with internal and external regulations, while ensuring equal treatment of Distribution Users, Counterparties in Connection Contracts and End Consumers. We operate with **respect for human dignity and human rights** and require the same commitment from all our partners. We ensure a healthy and stable work environment without any kind of discrimination. We serve the **values** of mutual respect and team spirit and we value everyone's skills. We recognize collaboration as a foundational element to build solid and lasting relationships, through which we can achieve corporate objectives.

We are attentive to the needs and expectations of our stakeholders. We are engaged in a continuous dialogue, providing them clear, complete and truthful information, acknowledging the criticality of transparency in all our activities. To maximize value and **mitigate business risks**, we safeguard our business continuity while creating opportunities along the value cycle of our activity to promote our business excellence. We strive to ensure efficient and **sustainable access** to energy resources in order to proact for the needs of future generations and advocate the protection of Human Rights, the environment and society as a whole.

For EDA THESS, innovation is at the cornerstone of personal and business growth. We are committed to cutting-edge technological upskilling in order to develop innovative ideas and improve our daily activities, contributing to the progress of civil society by increasing safety and reducing **environmental impact**.





Our Responsibilities

Inspired by the ideal of collaboration and focusing on mutual respect, the EDA THESS Code of Ethics is the fundament of the decision-making process as well as of all corporate operations, while it promotes the **corporate culture** of EDA THESS which is summarized in the principles of responsibility, legality, transparency, sustainable development and long-term value creation for all stakeholders.

The Code of Ethics is strictly applied by all members of the administrative and control bodies and all employees of EDA THESS as well as by all third parties who collaborate with us or work on behalf of the Company. Understanding, adopting and disseminating the Code of Ethics strengthens corporate values that are translated into **principles, clear commitments** and behaviors, contributing to the **Company's strategic mission**. The management of EDA THESS guarantees the implementation of the Code of Ethics both inside and outside the Company, strengthening the feeling of trust, cohesion and the team spirit that governs all its activities. Under no circumstances, acting in favor of or in the interest of EDA THESS may justify any behavior deviating from the principles and contents of the Code of Ethics.



Partners and stakeholders are expected to apply an equally socially responsible behavior and adopt **ethical standards** and **safeguards**, in accordance with the principles and behaviors presented in the EDA THESS Code of Ethics. The Company reserves the right to take measures against those who do not meet the above expectations and do not act in accordance with the principles of this Code.

WE RECOGNIZE AND PROTECT THE VALUE OF OUR PEOPLE



We promote the Health and Safety of our People

EDA THESS puts people at the core of all its activities and operations. For this reason, it makes every possible effort to guarantee the health and safety of its employees as well as the **communities** in which it operates. It prioritizes building a non-discriminatory working environment encompassing decent working conditions, dialogue and the strengthening of diversity. Acknowledging that commitment and mutual respect are **fundamental components** for achieving business and operational excellence, EDA THESS promotes and strengthens the skills of its employees and invests in the potential of its partners, supporting and disseminating the culture of innovation and change.

Safety is a top priority in all our activities. EDA THESS complies with the highest international health and safety standards, regulations, **legal** and **regulatory framework**. We aim for continuous improvement and we strengthen our organizational operations in

line with the principles of prevention, protection and risk management.

The Company provides the appropriate tools for prevention and protection against any malicious action that could cause direct or indirect damage to the people of EDA THESS and/or to the tangible or intangible resources of the company, regularly updating preventive measures and utilizing **available technologies** in order to avoid any involvement in illegal or dangerous behaviors.

The Company observes working and rest times in accordance with **applicable legislation** and international standards and informs its people, the community and its partners in a **clear** and **transparent** manner about the preventive and protective measures to be implemented in order to eliminate the risks involved in processes and the activities assigned to them.



We promote the creation of an Ethical Work Environment

EDA THESS believes in its people, who are the **cornerstone** of its success. It guarantees a working environment free of any form of discrimination or abuse, governed by mutual respect and solidarity.

Opinions and objections are communicated with **dignity** and **respect** while rejecting any behavior that entails physical or psychological violence, compulsion, harassment, intimidation, sexual harassment, any attitude or behavior that could create discomfort or inspire fear in another person, and any form of forced and/or child labour.

It guarantees respect for workers' rights and their **trade union freedoms**, in particular freedom of association and collective bargaining, promoting **responsible** and constructive dialogue with workers' rights organizations, and a climate of mutual respect in accordance with the principles of justice, transparency and participation.

It promotes the principle of equal opportunities, especially amongst **genders**, for every employee or candidate. It applies evaluation processes based on merit, competence and fair treatment in relation to the role, commitment and results achieved.





We value the professionalism of our people

EDA THESS values the skills of its people at all levels. It promotes the **dissemination of knowledge** and believes in the power of teamwork and the exchange of ideas to create synergies that help achieve its goals. Training is a tool for enrichment, spreading ethical values and strengthening the common corporate identity. Education and Training form the basis of **organizational integration** and promote change. Thus, everyone is encouraged to actively contribute to knowledge management processes in search of innovative solutions.

EDA THESS is attentive to the needs and expectations of partners and stakeholders, with whom it establishes transparent, fair and responsible **relationships**. It builds and maintains solid interactions with its suppliers and partners, based on the principles of **justice**, legality, respect for Human Rights and the protection of the environment and the communities in which it operates.

It protects its partners and end consumers by earning their trust through innovative high-quality services. It actively supports the communities in its **License Areas**, establishing strategic alliances with local partners, Authorities and agencies through which collaborative action and knowledge sharing become the driving force of socio-economic development.

WE OPERATE WITH INTEGRITY



We safeguard our Operational Independence

Both EDA THESS and the 3rd parties collaborating with the Company are committed to ensuring **operational independence**, which is a matter of utmost importance. The Company, since its establishment, has taken all the necessary measures to prevent discriminatory behaviors among Users of the Natural Gas Distribution Network and End Consumers, to safeguard access to commercially sensitive information and the confidentiality of the information managed by EDA THESS, as well as to **ensure transparency** throughout the range of its activities.



We manage our relations with suppliers and partners in a responsible manner



EDA THESS shares its values with its suppliers, commercial and industrial partners in order to build relationships based on maximum transparency. It promotes socially responsible behavior in all work practices and expects its suppliers and partners to operate in line with its high standards of respect for **Human Rights, sustainability** and **environmental protection**.

We seek to enter into agreements with suppliers and external partners who have the required professionalism and are committed to complying with the principles and provisions of the Code. We promote the establishment of **long-term bonds** for continuing improvement of **performance**, as our suppliers and external associates are valuable partners in our success.

The Company's relations with them are characterized by honesty, integrity, ethical behavior, mutual trust and impartiality. They are selected based on competitive criteria focusing on **overall value**, which includes quality, service, technological know-how and price. The terms and conditions governing EDA THESS's relationship with them are promptly communicated during the **selection process** and agreement on said terms and conditions, or any acceptable amendments, is reached before the onset of works. These terms include EDA THESS **policies** regarding payment terms, confidentiality, use of intellectual property, employee health, safety and work practices, and environmental requirements.

We manage our relations with the Distribution Users, counterparties in connection contracts and end consumers transparently

EDA THESS ensures the prevention of any discrimination among Distribution Users, Counterparties in Connection Contracts (Contractors) and/or End Consumers and fully respects their right to receive services that are safe for their health and physical integrity.

In addition, it **pursues business success** by consistently providing quality services, even under demanding market conditions. To this end, it recognizes that the appreciation of those who request and receive its services is vital and that the particular needs and expectations of Distribution Users, Counterparties and End Customers constitute unique opportunities to **achieve excellence** through mutual success and mutual gain.

In particular, **EDA THESS**:

- treats all Distribution Users, Counterparties and End Customers equally
- does not discriminate on the basis of the size, type, origin of the Distribution User, Counterparty or End User or any connection to its personnel, nor does it tolerate the unfair exploitation of one Counterparty/End User by another
- adheres to and supports its internal procedures that govern its relations with Distribution Users, Counterparties and End Consumers
- provides, willingly and efficiently, high quality services that meet its contractual commitments as well as the reasonable demands and needs of Distribution Users, Counterparties and End Consumers
- provides and communicates accurate and complete information about its services so that Counterparties and End Consumers are able to make informed decisions
- protects the personal data of Counterparties and End Consumers

The commercial policy and strategic choices of EDA THESS are based on best practices and the principle of professional loyalty to its consumers. It undertakes commercial initiatives focused on consumer needs, aiming to promote the company and develop the natural gas market, in compliance with consumer protection regulations.



We create value for our shareholders

EDA THESS respects and promotes the rights of its shareholders and protects their **investment**, maximizing the value of the Company. It adopts best corporate governance practices and ensures maximum transparency in order to create the conditions for **informed decision-making**. It communicates its strategies and the work of the company's management, guaranteeing a continuous and constructive dialogue with its shareholders. In addition, it takes due account of the legitimate comments expressed by shareholders whenever they are entitled to do so.

For this purpose, it sets, applies and updates a coordinated and homogeneous set of **rules of conduct** that concern both its internal organizational structure and its relations with shareholders and third parties. The implementation of efficient and effective operational rules is a fundamental tool for strengthening the Company's

reputation in terms of reliability and transparency, as well as the trust of the Stakeholders.

EDA THESS is committed to creating sustainable value for the benefit of shareholders, ensuring the sustainable development of its activities.





We cooperate with authorities and institutions

EDA THESS promotes and supports **active dialogue** and cooperation with international, national and local authorities and agencies, building synergies governed by transparency. In no case does it spread, transfer or make false or partially true statements before authorities and **institutions**. It maintains relationships of trust with the authorities and institutions within the scope of its **competence** and, in any case, refrains from contributions to political and trade union organizations, parties, movements, committees and organizations. Any misuse of the Company's name in personal interactions with political parties, movements and committees is avoided.



We collaborate with the communities in which we operate to create value

EDA THESS believes in the importance of creating strong and long-lasting bonds and **partnerships** with the communities in which it operates, in order to build long-term value for all. It shares its knowledge and expertise by promoting synergies with organizations and institutions involved in regional and international cooperation. It takes into account all environmental and social aspects, health, safety and respect for **Human Rights** in all its activities, and in cooperation with local communities, promotes continuous and transparent consultation to inform local communities, while ensuring that their expectations are always taken into account, to promote autonomous, lasting and **sustainable local development**.

It implements business actions and local development projects, in accordance with its **vision** of improving **quality of life** and supporting sustainable socio-economic **development**. It respects the rights of people and communities by recognizing and promoting culture, lifestyle, institutions, and development models in line with international standards, by adopting security measures aimed at protecting people and property, and respect for the rights of local communities.

We fight against corruption

Responsibility, integrity and **transparency** are the values that underpin the governance of EDA THESS. The **corporate structure** and organization, as well as the internal rules governing the operations of the Company, comply with all applicable national and international laws and regulations.

EDA THESS prioritizes the fight against corruption and always acts in accordance with the rules of legality, rejecting any kind of corruption, collusion or any other act that contradicts the standards of integrity and transparency it has adopted. It creates value by supporting a competitive market, **operating fairly** and fighting illegal practices. It avoids conflicts of interest and practices related to any involvement or participation in fraud.

It keeps the **Company's financial data** accurately, while protecting and carefully using information and personal data to which it has access. Through the Internal Audit and Risk Management System, it contributes to the dissemination of a culture of risk management and mitigation that allows it to conduct its activities in a sound and conscious manner.

In alignment with the axes of sustainable development, the Company has drawn up and implements an Anti-Corruption System, respecting the provisions of the Code of Ethics and the relevant Company Procedures and fully complying with the International Anti-Corruption and **Anti-Bribery Law**.

Focusing primarily on the adoption of **preventive measures** and **mechanisms** to strengthen its transparency and independence, the Company demonstrates zero tolerance for incidents of bribery and corruption, while adopting mechanisms to strengthen its independence in all its activities.

In order to raise the awareness of its staff and **third parties** on issues related to the Anti-corruption framework, a special awareness program has been implemented, resulting in zero incidents and safeguarding the immediate settlement of reports regarding operational independence.

At the same time, in order to avoid any incident deviating from the **Company's Policy**, a special **Anti-Corruption** and Anti-Bribery Committee has been established, to investigate, evaluate and manage the reports received.



Meetings with third parties

In compliance with the **Anti-Corruption Guidelines** and the Code of Ethics, meetings with third parties are based on correctness, transparency and **traceability of conduct**. Indicatively and not restrictively, a third party is defined as any natural person or representative of a legal entity, representative of a contracting company, external partner, representative of large consumption customers, representative of local authorities. In this context, every meeting with an **external body** or **stakeholder** is held in the presence of a committee, in which representatives of the involved and/or other Unit participate, if required, and minutes are kept. The above also applies in cases of remote communication (e.g. via teams, skype) with third parties.

We prevent and manage conflicts of interest



EDA THESS recognizes and respects the right of its employees to participate in investments, business or other activities outside the Company, provided that these are activities permitted by law, which are not in conflict with their **obligations** to EDA THESS.

In any case, EDA THESS employees protect and promote the interests of the company by making objective decisions and avoiding, where possible, any conflict of interest, acting in accordance with the Code. A **conflict of interest** may arise in any case where behaviors or decisions, in the context of the work activity, are capable of creating a direct or indirect advantage, even of a non-financial nature, in favor of EDA THESS employees, or their family, or third parties with whom they have close personal or business relationships.

A conflict of interest is a situation in which the aforementioned personal interests:

- may interfere with the Person's ability to make decisions and/or carry out impartial assessments in the interest of EDA THESS
- can be favored by an employee of EDA THESS in light of his/her position within the company, and the information to which he/she may have access to.

EDA THESS avoids interference in investigation, decision-making or control procedures that may arise in the context of situations of conflict. Situations of conflict, in which the employee, members of his/her family or persons with whom he/she maintains close **personal** or **business relationships**, have financial interests in relation to suppliers, customers, competitors, third parties or related parent or subsidiary companies, or hold administrative or control positions, are notified in writing to the manager or the sector to which the employee belongs.



Managing conflicts of interest

When handling reports of conflicts of interest - even alleged - the Manager, with the support of the competent sectors determines the appropriate measures to **ensure transparency** and **proper management** without undermining the interests of the person involved. The Manager or Sector to which the employee belongs communicates to the person involved specific instructions on how to manage the conflict of interest.

EDA THESS adopts rules to ensure the substantial transparency and correctness of transactions concerning the interests of Managers and **statutory auditors** as well as transactions with third parties. In any case, when performing their duties, EDA THESS employees must act fairly and impartially in any situation where a conflict of interest may arise and in full compliance with the principles and content of the Code.

WE RESPECT AND PROTECT THE COMPANY ASSETS

We know that our work is directly related to the use of corporate assets and the exchange of large amounts of information. Managing and communicating these assets involves a number of risks. For this reason, we **ensure protection** against any illegal behavior or improper use of company resources, including information and intellectual property that can harm the reputation of the Company. We protect our image and maintain the **trust** of the stakeholders daily and continuously.



We use corporate assets correctly

Each of us is responsible for the appropriate and sound use of the assets made available by the Company for the proper execution of the duties. Therefore, we are all obliged to **guarantee** the **integrity** of the assets by protecting them against theft, misuse, loss or any damage.

Making use of advanced technologies and applying high operational standards, we ensure the highest levels of infrastructure **safety** and integrity throughout the asset life cycle.

We monitor the operating conditions of the assets and record any situation that may cause a malfunction or a manageable risk. At the same time, we make limited personal use of the assets assigned to each employee, as long as this does not negatively affect work performance, harm the environment or contravene our **internal rules**.

We protect corporate information and intellectual property

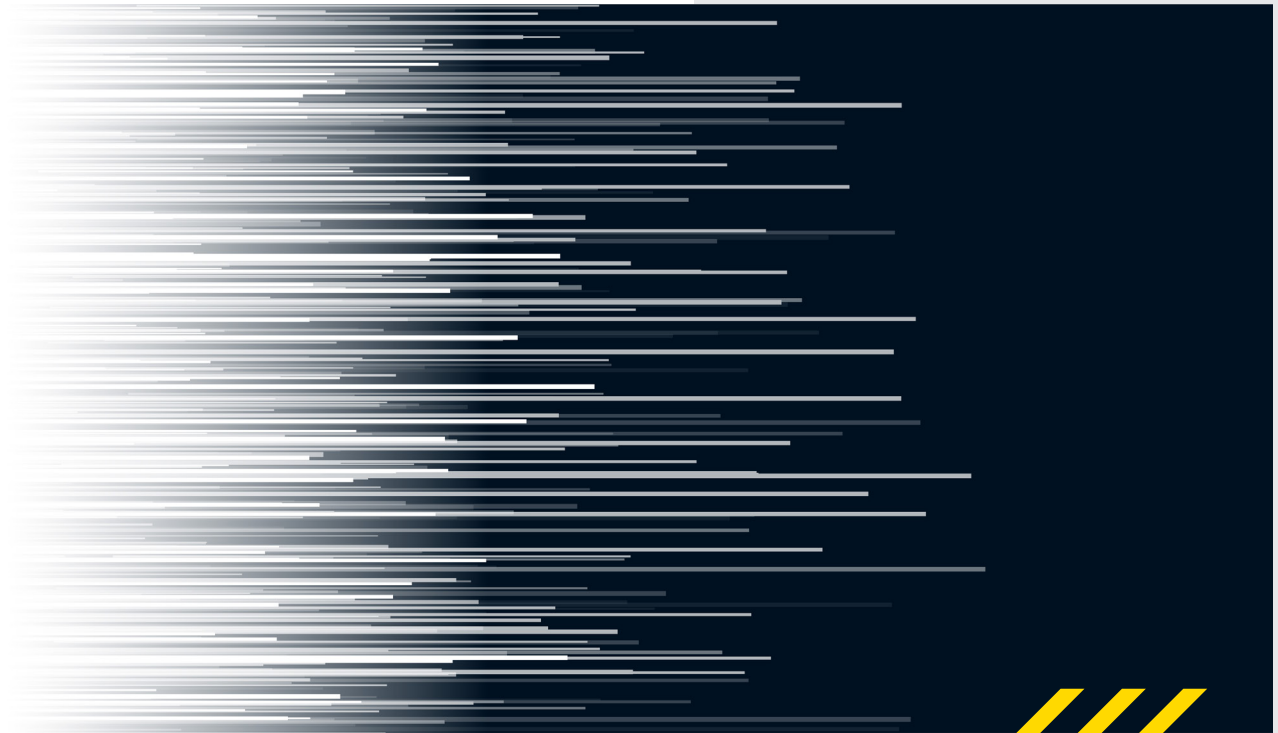


We ensure the correct management - internal and external - of all **corporate information** which, if improperly disclosed, can undermine the Company's competitiveness and damage corporate reputation. All company information, if not previously approved to be disclosed externally, must be **considered confidential** and, therefore, classified and protected. We recognize, protect and defend EDA THESS intellectual property, and we respect the intellectual property of third parties.

Regarding the media, only the **executives authorized** by the **Management** are responsible for interacting with the media. At the same time, we do not disseminate data or news concerning EDA THESS, without prior consent and approval from the Company.

We **ensure compliance** with **ethical rules** when handling data that may be confidential information of third parties. In addition, we implement an effective information security management system to protect the Company, its counterparties, and the security of our transactions.

In this **context**, we detect and **report** any violation, even potential, of the intellectual property of EDA THESS and we do not violate the property rights of third parties.



We protect our reputation

Our reputation is reflected in what the stakeholders think of the company and its activities. It is a determinant of our history, behaviors and outcomes. We are committed to protecting our **reputation**, complying with the principles of this Code of Ethics, protecting our relational capital, and taking into **consideration** the expectations of our stakeholders.

We are committed to using the **commercial identity** of EDA THESS in accordance with our mission and to associate it with activities and actions in line with the EDA THESS values as expressed in the Code of Ethics. In this direction, we recognize that all our actions on social networks are available in the public domain, and thus, we should safeguard the reputation of the Company.



WE COMMIT TO FIGHTING AGAINST CLIMATE CHANGE AND ITS EFFECTS

We recognize the need to actively participate in tackling climate change. For this reason, promoting an efficient and socially **just low-carbon energy transition** is our **strategic priority** and **main ambition**. Our commitment to combating **climate change** includes innovative solutions that aim to reduce the impact of our activities through the rational use of natural resources, the protection of biodiversity and water resources, and the support of measures to mitigate risks in the context of our activities.

We are constantly looking for technological solutions enabling the **rapid integration of renewable gases** into distribution networks while supporting the circular economy. On the road to the decarbonisation of energy systems, we actively support **sustainable development** for the benefit of the planet and the well-being of people.

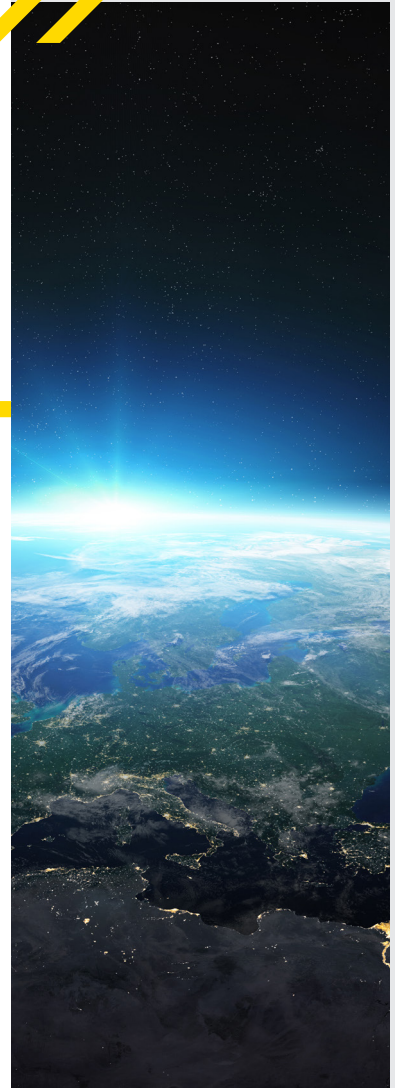


We support a socially just energy transition to a low carbon economy

At EDA THESS, we are all committed to **collaboration** in order to jointly respond to the double challenge of tackling climate change and providing access to **reliable** and **clean energy**, through concrete, direct and cost-effective sustainable solutions, contributing to national and community development.

To this end, we contribute to the identification and achievement of the Company's objectives regarding the performance of facilities, the reduction of direct **GHG emissions** and the promotion of a low-carbon energy mix.

In line with our strategy, we are committed to creating long-term partnerships in our areas of responsibility to **jointly build a future** where everyone can have access to sufficient and affordable energy resources.



We protect the Environment and optimize the use of energy resources

We conduct our business focusing on the responsible use of resources, minimizing environmental impact to prevent compromising the needs of **future generations**, and to create value for our stakeholders and society.

In the context of our **duties**, whether individually or as a group, we all actively participate in preventing risks and protecting the **environment**, a process that is in line with the principles of prevention, protection and continuous improvement. At the same time, we strictly adhere to the applicable regulations and adopt the highest international standards, obtaining environmental certifications from recognized bodies.

PUTTING OUR CODE OF ETHICS IN PLACE



EDA THESS **supports** and **maintains** an appropriate **internal audit** and **risk management** system that includes all the required or useful tools for the investigation, management and control of the activities in the Company, in order to ensure compliance with the applicable legislation and **procedures**, the **protection of corporate assets**, the effective and efficient management of activities and the provision of accurate and complete accounting and financial information, as well as to establish an effective process for identifying, measuring, managing and **monitoring key corporate risks**.

The responsibility of implementing effective internal audit and risk management systems is shared by the organizational structures of EDA THESS at every level. Therefore, all EDA THESS People, based on their duties and responsibilities, must identify and actively participate in the **proper implementation** and operation of the internal audit and risk management system.

EDA THESS at every level of its **organization**, aims at raising **awareness** on the efficiency and effectiveness of Internal Audit System and the cultivation of a mindset with a voluntary orientation towards accountability.

For this purpose, the Management and all the People of EDA THESS must, in any case, contribute and participate in the Company internal audit and risk management systems. In this process, they must also **ensure the active participation** of their partners, maintaining and demonstrating a positive attitude.

All employees are responsible for the **Company's tangible and intangible assets** related to their job. Employees are prohibited from making, or allowing others to make, improper use of the assets and equipment belonging to EDA THESS.

Any practice and conduct - **without exception** - associated with the commission or participation in acts of fraud is prohibited.

The Internal Audit Sector and the authorized audit firms **will have full access to all data**, documents and information required to carry out their relevant activities.



Promotion and dissemination of the Code of Ethics



The Code of Ethics is, inter alia, a mandatory general principle of the Organization, Management and Control Model applied by EDA THESS.

The Company establishes as guarantor for the implementation of the Code, the **Whistleblowing Committee (Anti-Corruption & Anti-Bribery)** consisting of the **Manager of Corporate Affairs & Internal Audit**, the **Manager of Human Resources** and the **Head of the Legal Service**. The Committee is supported by the General Management Administration Team, where required. In the event that one of the members appointed in the Committee is suspected of violating the **Code of Ethics**, she/he will be replaced by his immediate superior until the case is clarified. In case of absence of one of the appointed members, she/he is replaced by the assigned substitute member.

Every **communication** regarding the **Code of Ethics** is sent to the Guarantor at the following e-mail: kataggelies@edathess.gr (reporting a violation, filing a complaint) and ethicshelpdesk@edathess.gr (clarification requests, questions).

The Committee is in charge of:

- raising awareness on and facilitating the implementation of the Code, as well as establishing reporting procedures,
- planning and carrying out special briefings and training programs for the Management and staff of EDA THESS,
- examining reports on violations of the Code by initiating appropriate investigation procedures, taking actions upon request by People of EDA THESS in case of reports about non-remediation of violations of the Code or in case of information about retaliation against people of EDA THESS following the notification of violations ,
- informing the executives concerned about the results of the investigations regarding fines to be imposed pursuant to the Company's Internal Regulation, as well as informing the middle and senior executives about the results of the investigations regarding necessary measures to be taken.

In addition, the Committee submits to the General Manager a biannual report on the implementation of the Code and the potential need to revise it. The Committee provides the People of EDA THESS with all possible tools for understanding, interpreting and applying the Code.



EDATHESS

GAS DISTRIBUTION COMPANY

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