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 SUSTAINABLE DEVELOPMENT POLICY

#  INTRODUCTION

Sustainable development is a priority for all countries and business sectors worldwide. Sustainable development refers to the form of development policy that seeks to meet the economic, social and environmental needs of society in a way that ensures short term, medium term and, above all, long term prosperity.

At EPSILON NET we integrate environmental, social and corporate governance rules (ESG) into our corporate strategy, we make commitments and implement targeted actions. We operate responsibly, constantly evolving, in alignment with national and global guidelines and standards regarding Sustainable Development, with respect and value creation in mind for all our stakeholders.

Sustainable development is based on the assumption that development must meet updated needs without compromising the well-being of future generations. In action, this means creating the conditions for long term economic growth while ensuring environmental protection.

Sustainability is measured on the basis of non-financial indicators relating to the environment, social responsibility, corporate governance and are economically important for the interests of the stakeholders and thus for the company.

The sustainable development approach is spread and adopted by the Group's companies, enhancing their competitiveness and aiming to create value for the benefit of stakeholders, focusing on ethical business practices.

# PURPOSE

The purpose of establishing policies in the context of sustainable development is to create value for all participants in Greek business, society, employees and partners of our Group, through the achievement of the vision of business excellence and our participation in new developments in business and society, to meet the responsibilities arising from the social and environmental commitments of the Company.

# RANGE

The Sustainable Development Policy concerns the EPSILON NET Group as a whole, its people (Management - Employees) and other stakeholders.

# DESCRIPTION OF POLICIES

## Commitments

This policy is determined by the Management which is bound:

* for the continuous growth of the Company and the Group Companies, the evolution of the business model and the creation of economic value for shareholders and stakeholders
* to adopt mechanisms for interacting with and understanding the expectations of stakeholders and monitoring their effectiveness
* to respond to the expectations of stakeholders (employees, suppliers, customers, shareholders, social bodies, business community, institutional and financial bodies, etc.)
* to adhere to the principles and values of the Group
* to ensure business ethics and regulatory compliance
* to monitor the implementation of internal regulations, policies, procedures, sustainable development guidelines at all levels of the Company and the Group's companies' activities
* in terms of the environment, the pursuit of optimal services with a view to protecting it
* in terms of human resources, confidence in the abilities of staff and development of their skills, creating equal opportunities with respect for diversity
* in terms of society, supporting local communities with actions that help to respond to local issues, concerns and aspirations
* in terms of the market, a commitment to the continuous improvement of the products and services provided
* in terms of the customers for the formation of not just formal business transactions, but for strong relationships of cooperation and trust
* in terms of products, for technologically advanced and reliable software systems that provide innovative solutions and security

In order to achieve the above commitments, the Group companies focus on the thematic pillars of sustainable development as described in the following sections.

* Corporate Governance

The Group recognizes the importance of the system of corporate governance principles and the benefits that arise from their proper implementation. Aiming to create further value for shareholders, across all Group functions and guided by our strong corporate structure, we apply a framework of good corporate governance that allows us to develop relationships of trust and mutual benefit with investors.

EPSILON NET has developed a modern governance system, fully harmonized with the current legislation and with the Hellenic Corporate Governance Code of the Hellenic Corporate Governance Council. It operates on the basis of structures, management bodies, policies and procedures that contribute to enhanced transparency and optimal decision-making taking into account the interests of stakeholders. We have set high standards of ethical conduct and demonstrate zero tolerance for incidents of fraud, corruption and market abuse, implementing the necessary measures to monitor, prevent and respond to such incidents throughout the Group's activities.

Specifically, the company is active with the aim of enhancing:

* effective governance
* regulatory compliance
* risk management
* optimal operational efficiency
* the principles and values of the Company and the Group for the benefit of the interests of shareholders and to demonstrate responsibility to stakeholders
* Environment

We operate responsibly towards the environment and the use of natural resources. We are committed to taking action and developing initiatives to protect the environment and reduce our environmental footprint. Protecting the environment is everyone's business and EPSILON NET's environmental policy is applied to all aspects of the company's activity, in accordance with the applicable legislation.

In the context of the Sustainable Development Goals (SDGs), the Paris Climate Agreement (2015) and the European Green Deal (2019), monitoring international developments, improving the Group's environmental performance and identifying the risks and opportunities arising from climate change are key areas for strengthening our environmental policy.

It aims to reduce its environmental footprint and acts substantially by adopting specific recycling and energy-saving practices.

* People and society

Of key importance for the EPSILON NET Group is the social axis that governs its activities, as it is directly linked to the creation of value for its people and the wider society in which it operates.

* Social Responsibility and Human Resources

For the EPSILON NET Group, people constitute a wider family and are clearly its most important asset. Traditionally, the Group's approach is people-centric and the development of an ideal working environment is a commitment of the Group's Management for all its Companies. All employees of the Group, with a common vision, contribute to the achievement of the business goals set, having the Group always at the heart of technology. The constant concern for employees and their families has created a consistently award-winning work environment.

* Health and safety at work

EPSILON NET, bearing the responsibility for the health and safety of its employees, ensures the necessary conditions that guarantee the health and safety of its employees. In this context, the Group’s companies employ an occupational physician, who examines the personnel every month to confirm their fitness for work and in any case is available to all employees for personal health issues.

In addition, in order to ensure healthy and safe working conditions for all, he/she provides advice, such as frequent breaks for those working at a computer, correct posture, etc. Finally, the Group continuously invests in building infrastructures and in its facilities in Thessaloniki and Athens, in order to ensure easy access and exit, security and technological excellence, while throughout the year, visits are made by a Security Technician who supervises compliance with security rules.

* Society

The Group's companies encourage volunteering and support vulnerable social groups. They plan and implement actions aimed at improving the quality of life, fighting poverty, improving the technological skills of society as a whole and the country's transition to the digital age. They cooperate with Non-Governmental Organizations and other public benefit organizations to enhance the livelihood opportunities of the less favored social groups, make donations and stand in solidarity through actions organized at regular intervals.

* Market & Customers

In a rapidly changing business environment, businesses need technologically advanced and reliable software systems that provide innovative solutions and security.

EPSILON NET is committed to the continuous improvement of the products and services provided to its customers, constantly ensuring the security of their personal data.

It forms not just formal business transactions, but builds strong relationships of cooperation and trust with the customers.

It collects and processes data solely for the purposes of its legal and proper operation and to offer its customers and internet users the best possible user experience.

# STAKEHOLDERS

The Company and the Group Companies develop relationships with all internal and external stakeholders, based on trust and honesty. Particularly with regard to suppliers and partners, the result of their continuous and constant evaluation, in terms of financial and qualitative elements, is a basic condition of cooperation.

Through the overall activity, transparency and open and two-way communication with all stakeholders is promoted and strengthened.

The Company and the Group Companies set and develop individual targets regarding the material subjects of sustainable development, which are evaluated annually for their effectiveness and updated whenever necessary.

# APPROVAL AND COMMUNICATION

All actions undertaken in the framework of sustainable development are included in the company's financial statements in the non-financial reporting context, as well as in the sustainable development report published annually.

The aim is to inform stakeholders in a comprehensive, transparent and effective way about the company's strategy, objectives and performance on key sustainable development issues.

# IMPLEMENTATION MONITORING

The company maintains the responsibility of monitoring the faithful implementation of the Policy by itself and the Group’s companies, through its competent executives, with the contribution and participation of the audit mechanisms at its disposal and with the methodology it has designed. The overall supervision of the sustainable development framework of the Group's companies is carried out by the Board of Directors of EPSILON NET.

Approved by the Board of Directors of EPSILON NET SA at its meeting on 17/10/2022.