



EPSILONNET
GROUP OF COMPANIES

SUSTAINABLE
DEVELOPMENT REPORT OF
EPSILON NET GROUP
2023



A hand is visible on the left side of the frame, holding a small, light-colored object. The background is a vibrant green with soft, out-of-focus circular light spots (bokeh) scattered throughout. The text is positioned in the lower right quadrant of the image.

SUSTAINABLE
DEVELOPMENT REPORT OF
EPSILON NET GROUP
2023

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A. SUSTAINABLE DEVELOPMENT REPORT OF EPSILON NET GROUP

The Sustainable Development Report for the financial year 2023 is the report on the activities and characteristics of the companies of the EPSILON NET Group, covering the period from 01.01.2023 to 31.12.2023 and referring to the Group's non-financial indicators.

It is addressed to all stakeholders of the Group and has been prepared based on the standards of the ESG 2022 Disclosure Guide published by the Athens Exchange (ATHEX) in 2022.



Message from the Chairman of the Board of Directors - ESG Objectives (A-G3)

“ The times we live in and the major challenges we are called upon to collectively address, such as climate change, social responsibility and good business operations, require us to align ourselves with the priorities and dictates of the modern environment, to empower society with new values, to continue to operate responsibly, with long-term value for the Greek business community and for the society in which we operate.

At EPSILON NET Group, we have integrated and developed sustainable development in our operations and in our vision for the future. A vision guided by our purpose, to showcase the power of participation, enhancing the quality of life for all, today and in the future. We deepen our social role and our ethical mission, believing that the well-being of businesses is parallel to that of societies.

The companies of our Group, actively participating in new trends, systematize, collect and record all those data and information that make us pioneers in various areas of social and business activity, winning many distinctions at national and European level.



This Sustainable Development Report of EPSILON NET Group highlights the philosophy of continuous growth, which is transformed and keeps pace with developments in all sectors that determine our sustainability:

In its operation, activities, services, actions and finally in the objectives, both short and long-term, that it sets in order to respond to the ever-increasing economic, social and environmental needs.

We are planning the future of our Group as a whole, our participation in Sustainable Development, strengthening our involvement in society, in national policies to tackle climate change.

Our Group increases its financial performance alongside its environmental and operational investments, through the participation of its people in the daily functions of education, social contribution, equal participation of both sexes in all corporate functions, strengthening the processes of corporate governance, transparency and accountability. ”

A1 GROUP SUSTAINABILITY - STRATEGIC OBJECTIVES

The growth rate of EPSILON NET Group is the result of planning and strategic moves we adopted several years ago, having diagnosed in time the upcoming trends of the Greek economy and international developments in technology and business.

Since 2013, we have started to invest in cutting-edge, cloud, web and mobile technologies, as well as in AI technologies, which ensure remote working, direct access to corporate data and processes from any workplace, the security of data and their further exploitation through modern methods of analysis and processing, while strengthening our organisational structures. Digital transformation was and continues to be the only way, while the company received a significant boost from its entry into the main market of the Athens Exchange.

All these moves have allowed us to seize opportunities at the right time and to expand further. Of particular importance is the fact that EPSILON NET Group is financially sound, financing its investment program with its own funds all these years. It is worth noting that most of our investments are made through our profitability and that the company has negative net debt.

Following its inclusion, two years ago, in the Main Market

of the Athens Exchange, EPSILON NET has made a significant number of acquisitions, proving in the most emphatic way, that healthy partnerships multiply the dynamics and strength of a business unit. It started with the acquisition of Data Communication with a significant share of the accounting market, followed by the acquisition of SingularLogic and the establishment of Epsilon SingularLogic, a central pillar in the field of business software and digital business transformation. This was followed by a significant number of acquisitions of companies, strategically positioned in software development in niche markets, such as tourism, catering, retail, pharmacies, and pharmaceutical and parapharmaceutical distribution. Our main objective is to develop complementary products and services based on our strategy and to create all-in-one solutions that meet multiple business needs.

For the next three years, there are very high expectations for high growth rates. This is because, both the public sector and private companies, due to the multi-year financial crisis, have been significantly delayed in starting their digital transformation process. As a result of this lag, the scope for growth is very large, while the need for the adoption of modern systems has skyrocketed due to the pandemic and the new needs for digital adaptation to the requirements of tax and labour legislation, such as the universal implementation of "mydata" and the implementation of the digital job card.

Furthermore, the strategic cooperation with the National Bank Group marks a new era in the provision of modern digital banking methods and Fintech technologies through the ecosystem of Epsilon Net Group's software applications and the new systems developed in parallel by the two groups.

Our Group, over a period of three years, is launching its further expansion outside Greece, as well as strengthening its activity in other vertical markets through acquisitions and partnerships, which are of high growth interest. Outside Greece, the Group already has a presence through

subsidiaries in Romania & Cyprus and through partners in Bulgaria, Albania, and Croatia.

2023 was a particularly successful year and this is strongly evidenced by the following points:

- The 48.69% increase in the Group's turnover and the significant strengthening in all financial ratios, with a further increase in organic results, an increase in the customer base and the maintenance of a healthy financial image, while increasing operating profitability and cash reserves despite the extensive investments and acquisitions made.
- With continuous effort in the training of our potential employees and the users of our applications, through the existing structures of the group and with the decisive role of the training branch Epsilon Training and Epsilon College. Our goal is to train young people in IT. At the same time, we have created greenhouses & incubators in order to strengthen start-up companies

and attract new executives. Finally, we have systematically interconnected with university institutions and we are creating our own innovation centre, which will be installed in 2024 at the Group's new privately owned facilities in Thessaloniki.

- An important position in the Group's business planning is the start of the implementation of the integrated strategic agreement with the NATIONAL BANK Group, in accordance with the relevant Memorandum of Understanding (MoU) (see the company's press release of 16.11.2022), which will expand and complete the strategic "all in one solution" approach. The implementation of the strategic agreement will gradually lead to the creation of a unique "technological ecosystem" for Greece, which will provide, through the Group's tools, the possibility of integrated services to the final customer - business (regardless of its size).

A2 ✓ SHORT-TERM OBJECTIVES 2024-2025

EPSILON NET Group in 2023 continued the strategic business plan of its companies, while it redefined the objectives it had set from the previous year:

- Shaping a new model of Corporate Governance based on the new legislative framework.
- Formulating a long-term ESG strategy that enhances the transformation, growth and sustainability of the Group's companies.
- Further exploring risks and opportunities as they arise from the current business environment and climate change. The Group focuses on:

- ✓ human rights issues
- ✓ equality and diversity
- ✓ the steady reduction of energy consumption
- ✓ the gradual reduction of the carbon footprint
- ✓ aims to strengthen the provision of technology solutions that contribute to addressing environmental and social challenges

- At the same time, the Group has systematically dealt and continues to deal with issues related to Human Resources Development and the attraction of new talents, while emphasis was placed on measures for the health, safety and welfare of employees in the midst of the pandemic. As we continue our journey and our work, we aim to create a just and resilient society and contribute to a prosperous economy.
- The management intends to undertake the appropriate initiatives to enhance the level of organization and operation of the Group, which will upgrade its overall efficiency and help in the implementation of the business plan. The strategic objective of the management remains the continuous creation of value for shareholders, partners and staff as the largest Business Software & Solutions Technology Group in Greece



A3 BUSINESS MODEL (A-G1)

The EPSILON NET Group is a rapidly growing group of companies, which has been active since 1999 in the IT sector, with the development of software applications (Software), the creation of digital content on the internet, and the provision of integrated information, as well as training and education on issues related to tax and labour legislation and jurisprudence. The products of the EPSILON NET Group companies are currently trusted by more than 150,000 customers (accounting firms, businesses, freelancers), while it has an ever-growing network of more than 500 partners throughout Greece.

The business model that we have adopted as EPSILON NET aims to achieve maximum performance through the synergy of our Business Units and our subsidiaries, maintaining flexibility, competitiveness, and implementing strategic moves that will ensure a dynamic response to the challenges of a constantly evolving market, especially in the field of IT and high-tech products.

Our vision is to establish the Group as a reference point in the IT sector - at a national and international level, providing every business unit with modern software applications that will help them in their digital transformation and in the optimal use of information for their maximum growth, as well as unlimited access to scientific information and knowledge, making the most of the possibilities provided by high technology.

Our mission includes following the developments in the technology and information society, creating specialized and reliable products, and high-quality services, in order to cover the needs of all business units in a comprehensive way.

Our values:

- **Reliability and High-Quality Products:** Within a rapidly changing business environment, businesses need technologically advanced and reliable software systems that provide innovative solutions and security.
- **Commitment to the Customer:** We form not just formal business transactions, but we build strong relationships of cooperation and trust with our clients.
- **Respect, Meritocracy & Equality:** we respect our human resources, having as our primary concern the assurance

of meritocracy, with emphasis on teamwork and cooperation, offering a pleasant working environment.

- Continuous training and scientific documentation: We encourage a culture of continuous self-learning and encourage all employees to participate in any activity that develops their skills and knowledge. We stand by our position on scientific documentation that underpins all activity and operation of the organization.
- Smile and "passion": They are a source of inspiration and creativity throughout the life of the company and the Group.
- Optimism: We see every crisis as an opportunity and a new challenge, and with optimism we find solutions and become better.
- Creativity: With positive energy, ingenuity and passion for technology, we design and create products and solutions for all businesses regardless of size.
- Value Creation: Creating value for all stakeholders and shareholders of the Company.

The operations of the EPSILON NET Group are divided into two business areas:

- **IT Sector**, whose activities include:

1. the advancement of hybrid technology platforms for the development of IT solutions (PYLON, Galaxy, etc.)
2. the advancement of cloud, web and mobile technology applications (EPSILON SMART application)
3. the development and sale of business software products
4. the development of new, modern digital transaction products and services



5. the design and implementation of private IT projects
6. the development and advancement of cognitive data-bases and data mining tools
7. the provision of information services through various features provided on the “e-forologia” and “TaxHeaven” portals
8. the provision of specialised support services on business software products to their end users.

- **Education Sector**, whose activities focus on:

1. the development of technological solutions for online and asynchronous education



2. the design of educational products and services
3. the professional training of business executives and professionals
4. the provision of undergraduate and postgraduate programmes of study in economics through academic (Northampton University, NKUA) and professional (AIA, S.O.E.L.) institutions.

Educational services are provided through the two educational organizations (which the Company has in Athens and Thessaloniki) which are certified by the Ministry of Education and Religious Affairs.

In addition, EPSILON NET has been certified by the Ministry of Education and Religious Affairs as a Lifelong Learning Centre II and as a College with the distinctive title "EPSILON NET College".

We clarify that a Group company provides the training process, while the supervision of the examinations and the final certification of the students is carried out by the partner academic or professional institutions.

Our comparative advantages:

- We provide integrated solutions that cover all the needs of the business regardless of size and scope (All in One Solution).
- Significant investment in new technology (Hybrid Technology) over the last 5 years leading to the creation of the Pylon platform and the software applications developed based on it.
- Development of modern applications in cloud, web and mobile environment (EPSILON SMART)
- Products that cover all businesses regardless of size and industry (All in One Solution).
- Modern information and knowledge products and services that combine effectively with software products.
- Provision of specialized training services for business executives that enable participants to effectively deepen their understanding of the changes taking place at the tax and employment level and the assimilation of knowledge.
- High-level management team.
- Management with vision and strategy.
- Commitment to the principles of corporate governance.



THE COMPANIES OF THE EPSILON NET GROUP (2023)

AAA
Hotel Availabilities

**EPSILON
OROSIMO**
MEMBER OF EPSILONNET
GROUP OF COMPANIES

Book
OnlineNow

H
HOTELONCLOUD
HOSPITALITY SOLUTIONS

EPSILONCSA
MEMBER OF EPSILONNET GROUP OF COMPANIES

digital4u
all about internet

DigiNET
TECHNOLOGY ORBITAL
MEMBER OF
EPSILONNET GROUP OF COMPANIES

**NETERA
SOFTWARE**
MEMBER OF EPSILONNET
GROUP OF COMPANIES

SCAN
INFORMATION SYSTEMS
MEMBER OF EPSILONNET
GROUP OF COMPANIES

**OROSIMO
SOFTWARE**
MEMBER OF
EPSILONNET GROUP OF COMPANIES

pcs
MEMBER OF EP ILONNET
GROUP OF COMPANIES



EPSILON NET S.A.

It operates in the sectors of IT (Epsilon Net Software), digital content creation on the internet (Epsilon Net Network), and education (Epsilon Net Training).

- Epsilon Net Software Business Unit: It is active in providing integrated software applications to businesses and accounting firms.

19 different products integrated into three major production lines:

Payroll and HRMS applications, applications for accounting firms, and ERP applications for businesses.

- Epsilon Net Network Business Unit: It refers to the online creation of scientifically documented content with legislative material on economic, tax and labour legislation. The reference point for these services is the portal www.e-forologia.gr, as well as the monthly subscription magazine in print and electronic format Epsilon7.

- Epsilon Net Training Business Unit: It offers high-level professional training and specialization through open or in-house seminars and workshops. In addition, it provides exclusively in Greece the AIA (Association of International Accountants) International Certification Titles, one of the 6 recognized - certified organizations of supervision of auditors - accountants of Great Britain, with presence in more than 85 countries internationally.

EPSILON SINGULARLOGIC S.A.

It offers leading and innovative design, development and implementation solutions through its Pylon and Galaxy platforms, creating added value to all businesses, as well as to key vertical markets. It dominates the Greek IT market, with the most qualified and skilled executives in the industry and specialized expertise in ERP, CRM, RETAIL, WMS, MOBILE, MIS systems, as well as a certified and strong network of more than 500 partners. The company was formed through the acquisition of SingularLogic by Epsilon Net and Space Hellas.

EPSILON HR S.A.

It is the leader in the field of Human Resource Management - Payroll, setting new standards in the market of information systems, following the acquisition of the products of SCAN, Data Communication and Epsilon SingularLogic. It offers a unique portfolio of programs that highlights innovation and meets the needs of any business in the Greek market, regardless of their size.

DATA COMMUNICATION S.A.

With 35 years of dynamic presence in the market and 3 technological product generations under its belt, it is one of the largest software manufacturers in Greece. It has linked its course to innovative applications that drastically improve the way accounting firms operate. As a Microsoft Gold Partner, it promotes and supports the full range of Microsoft Dynamics business solutions, while developing its own solutions and add-ons for vertical markets.



EPSILON HOSPITALITY S.A.

It specializes in the Hospitality and Catering sector, offering products and solutions for hotels, tourist accommodation, catering and retail businesses in the tourism sector. It has a rich product portfolio that combines Pylon and Galaxy with solutions and products of Sysco S.A. & Hoteliga International Sp. z o.o.

HOTELIGA INTERNATIONAL Sp. Z O.O. | HOTELIGA S.A.

It is active in the development of software for the hospitality industry, offering hoteliers and owners of tourist accommodation of all kinds an easy-to-use and integrated platform to manage the operation of their businesses online.

iQOM S.A.

Subsidiary of Epsilon SingularLogic and member of the Epsilon Net Group, providing integrated IT solutions. It specializes in the development of standard business software for Retail, holding the leading position in this field.

TECHNOLIFE LTD

It is active in the provision of integrated solutions in the field of business software. It specializes in the implementation and support of ERP software applications, the development of special custom applications, the installation and support of network systems and telecommunication networks. Its solutions cover almost the entire range of professional activities.

SYSTEM SOFT S.A.

Subsidiary of Epsilon SingularLogic and member of the Epsilon Net Group. It has been active since 1995 in the provision of IT solutions for small and medium-sized enterprises in the private sector. Its activities include the marketing of computer systems and networks, the promotion of software applications, the provision of training and application support services, and the provision of technical support.

EPSILON SUPPORT CENTER S.A. | EPSILON SUPPORT THESSALONIKI

It offers high-quality support and software development services with innovative integrated IT solutions, ensuring the best support for Epsilon Net's network of partners.

PROFESSIONAL COMPUTER SERVICES S.A.

It has been providing integrated vertical solutions for the financial and insurance sector for 30 years. It offers solutions such as Wealth Management, Mutual Funds, Pension Administration, Fund Distribution, Brokerage and Corporate Transactions. It operates in foreign markets, such as Luxembourg, Romania, Bulgaria, Cyprus, Serbia, Turkey, Poland, Kenya, and Malta.

EPSILON CSA S.A.

It is active in the development of software for the pharmaceutical retailers and wholesalers. It holds a leading position in the pharmacy sector, as most computerized pharmacies in Greece use its software. It has high expertise and a large network of partners throughout Greece.



DIGITAL 4U S.A.

It operates in the field of Digital Marketing, offering a variety of services to its clients and covering the entire range of online promotion, depending on their individual needs. It has extensive experience in creating e-shop/e-Commerce solutions, both in construction/optimization and promotion, offering a full range of solutions.

EPSILON SUPPORT CENTER ATHENS S.A.

It offers high-quality support and software development services with innovative integrated IT solutions, ensuring the best support for Epsilon Net's network of partners.

EPSILON SINGULARLOGIC CYPRUS LTD

EPSILON SINGULARLOGIC CYPRUS LTD, based in Limassol, Cyprus, promotes, supports and resells the group's applications in the Cyprus market.

TAXHEAVEN S.A.

Tax and accounting information portal, active in providing integrated information products and services, training, online Data Base Systems and regional IT applications for businesses and accounting firms.

HOTEL AVAILABILITIES S.A. | HOTEL AVAILABILITIES LTD

They specialize in the development and distribution of Channel Manager systems for hotels and tourist accom-

modation. It has developed the cloud solution Hotel Availabilities Channel Manager, which is interconnected with a large number of channels (booking.com, Expedia, Hotelbeds, etc.) that exceed 65. At the same time, it provides intelligent functions to the hotel manager with the aim of a specialised approach per channel.

BOOKONLINENOW P.C.

It is active in the development of ONLINE booking engine systems for hotels and tourist accommodation, having developed one of the most sophisticated hotel booking systems worldwide. In addition, it offers integrated services and innovative tools to increase direct bookings and maximise sales.

HOTELONCLOUD LIMITED

It provides integrated technology solutions for hotels. It is BookOnlineNow's main strategic partner abroad in markets in Europe, Africa, the Middle East, South-East Asia and Latin America. The company's services/solutions also include the provision of Digital Marketing services and tools to increase direct bookings from the hotel's website.

SINGULARLOGIC ROMANIA

The company is active in the promotion of business software applications and the provision of installation and configuration services to companies of all purposes and sizes in the Romanian market.

EPSILON EUROPE PLC

Subsidiary of EPSILON NET S.A., based in Cyprus and aiming at the future development of the group's activities in Europe.



EVOLUTIONSNT PLC | EVOLUTIONSNT (UK) LTD

Subsidiaries of EPSILON EUROPE PLC, based in the United Kingdom, for the future development of the group's activities in Europe.

During the financial year 2023, the EPSILON NET Group of companies was further developed, after adding the following companies to its portfolio:

OROSIMO SOFTWARE

The company OROSIMO specializes in:

- the implementation of complex IT projects and installation of ERP, CRM, Supply Chain Management in medium & large enterprises with emphasis on activities in the industry, logistics, transport in Greece & abroad, and in
- the development of special software solutions & systems that meet the specific needs of its customers.

EPSILON OROSIMO ROMANIA

The company is active in the promotion of business software applications and the provision of installation and configuration services to companies of all purposes and sizes in the Romanian market.

DIGINET

It specializes in the development, distribution and technical support of modern tax & cash systems and specialized technology products & solutions (Technology Distributor).

NETERA

The company supports with its solutions more than 800 hotels & tourist accommodations providing integrated training and support services to end customers with on-premise and on-cloud PMS systems, as well as electronic invoicing system for small accommodation.

SCAN

SCAN S.A. is an important partner of the EPSILON NET Group, having the responsibility for the selection, supply & distribution of access control systems, time and attendance systems and generally integrated solutions with payroll systems & HRMS. This sector is expected to show remarkable growth in the coming years.

This, combined with the utilization of EPSILON NET Group's leading position in payroll systems and multiple distribution channels, is expected to provide a significant increase in the company's revenues.



A5 } IMPORTANT DISTINCTIONS 2023



The Group's awards are the culmination of its growth, its technological excellence, and its people-oriented culture. They highlight the corporate vision, the commitment to daily efforts and the substantial contribution in the field of information technology, new technologies and business, confirming its constantly upward course and its commitment to the "people" factor.

Within the year 2023, it was distinguished and won the following awards:

- The Group excels in the BITE Awards 2023, winning 15 awards, including the "ICT Company of the Year 2023" award, the top distinction of the institution.
- The Group with the participation of its subsidiaries, Epsilon SingularLogic, Epsilon HR, Epsilon Hospitality and Epsilon CSA, wins 3 GOLD and 2 SILVER awards at the Cloud Awards and the Supply Chain Awards 2023.
- The Group wins the top distinctions Greek ICT Award & ICT Jubilee at the 25th Greek ICT Forum.
- The Group was recognized for the second consecutive year at WITSA's Global Innovation and Tech Excellence Awards, winning two important distinctions.
- The Group is ranked 1st in the Best Workplaces in

Technology 2023, making it the leading employer in the Technology and IT sector in Greece.

- The Group is ranked 6th in the category of large companies (500+ employees) in Europe's Best Workplaces 2023.
- For the 9th consecutive year, the Group is ranked 2nd in the category of large companies in the Best Workplaces 2023.
- The Group is included in the Great Place to Work list as Best Workplaces™ for Women Hellas 2023.
- Data Communication is certified with a score of 100% by Microsoft for its Business Applications solutions to provide integrated solutions for Dynamics 365 and Power Platform.
- Epsilon Training wins 2 major awards at the Education Leaders Awards 2023 as a Training Unit that invests in attracting and developing the best human resources and for its certification as a "Microsoft Certified Technical Learning Partner".
- Epsilon Hospitality won the Gold Award of the Greek Hospitality Awards 2023 in the category "Best Hotel IT, Web & Telecoms Supplier".

A6 ✓ CORPORATE RESPONSIBILITY IN THE EPSILON NET GROUP

The EPSILON NET Group, through the values that it stands for, develops and creates value, combining harmoniously actions for the society, the employees, and the environment, with responsibility and sensitivity for people.



B. SUSTAINABLE DEVELOPMENT





INTRODUCTION

Sustainable development is a global priority that mobilises governments, civil society and businesses to adopt new practices. With the adoption of the United Nations Sustainable Development Goals (SDGs), a new understanding of the role of companies has emerged. More and more companies are measuring, disclosing and managing the risks and opportunities related to sustainable development.

Environmental, social and governance-related factors, also known as ESG Factors, are rapidly being integrated into the operation of businesses as well as into the institutional framework of capital markets. The term "ESG" refers to environmental, social and corporate governance issues that can affect a company's ability to deliver value in the long term.

The EPSILON NET Group of companies participates in the new initiatives that are being developed, aiming to reflect the ability of the Group's companies to create value and formulate effective strategies with a long-term horizon. We monitor, participate and shape the new challenges developing at the EU level, through the new directives that lead to reform ESG criteria, the new data on audits and certifications required.

We create long-term and sustainable value for all our Social Partners, contributing to the Global Sustainable Development Goals and the respective national priorities. The present report on the Group's sustainable development for 2023 is another attempt to capture the characteristics of our Group, which were present in previous years and are systematically incorporated in a non-financial reporting document.

B1 SUSTAINABILITY REPORT - ESG OBJECTIVES (AG3)

The sustainability report of the EPSILON NET Group of Companies for 2023 takes on greater weight and substance, if we take into account the events that have taken place globally.

The energy crisis, high inflation, massive and ongoing environmental disasters and ever-increasing social inequalities have been substantial challenges, but have further intensified our efforts in implementing and targeting ESG practices. The instability of the economic and social environment creates a new reality that we have to cope with, with our people and our

contribution to the protection of the environment as our first priority. Our objectives are set in the context of a marathon effort to perform better year-by-year by encouraging our people to consume responsibly, for the collective good



B2 ✓ SUBSTANTIVE ISSUES 2024-2025-2026

E

1. Innovation with a focus on digital transformation and a neutral carbon footprint
2. Strengthening initiatives for increased participation of renewable energy mix
3. Further strengthening the fleet with hybrid and electric vehicles

S

1. A working environment that promotes health and safety
2. Continuous development of our people
3. Inclusive and non-discriminatory working environment
4. Positive footprint on society, the economy, and the environment in the areas where we operate
5. Contributing to the circular economy through efficient management, recycling, and resource recovery
6. Reliable and sustainable supply chain

G

1. Good governance, transparency, and business ethics
2. Strengthening structures and policies to safeguard individual behaviour in relation to harassment, complaints, etc.
3. Increasing the participation of women in management positions and further reducing the pay gap
4. Strengthening communication with shareholders, institutional and private investors

B3 THE SIZES OF THE GROUP AT A GLANCE (F.Y. 2023)

In summary

- 29 Companies
- + 1,500 Employees
- + 40 Products
- + 150,000 Customers
- + 500 Partners

Human Resources

- Employees 1,576
- Women 43%
- Men 57%
- 80% under 50 years old
- 20,025 man-hours of training
- A 15.2 average of training man-hours per employee (14.5 10% higher pay | 15.8% 90% lower pay)
- €51,560 in staff training
- A €191.7 average training cost per employee

Our sales

- 40.44% ERP + Vertical
- 21.51% Accounting
- 13.98% HR
- 14.66% e-Invoicing,
- 4.17% Hotel
- 3.51% Technology Systems
- 1.73% Educational Services

Economic Figures

2023	
Revenue	
€93,23m	+24%
EBITDA	
€29,17m	+51%
ADJUSTED EBITDA	
€31,08m	+24%
EAT	
€20,02m	+59%
ADJUSTED EAT	
€21,93m	+20%

Taxes and contributions

- €40.51 million



Our Financial Activities based on the Taxonomy

Within the framework of the provisions of the EU Taxonomy, the Group, by relating its economic activities to the activities included in the regulation on the European classification system (<https://ec.europa.eu/sustainable-finance/taxonomy/>) has identified as eligible for the taxonomy, the activity referred to as "62.01 - Computer programming activities" of the economic activity "Information and Communication" and the activity referred to as "85.5 - Other education" of the economic activity "Education". The specific categories that relate to climate change mitigation and adaptation objectives include the Group's activities related to

- 1) designing the structure and content and/or writing the computer code necessary for the creation and implementation:

- system software (including updates and code updates)
- software applications (including updates and code updates)
- databases
- Websites

2) software customization, i.e. modifying and configuring an existing application so that it is functional in the customer information system environment

3) general continuing education and continuing vocational education and training for any occupation, or for self-development purposes.

The table below sets out the percentage of the Group's turnover, capital and operating expenditure relating to the economic activities eligible for classification under the requirements of Article 8 of the Classification Regulation and Article 10(2) of Article 8 Delegated Act:

	TURNOVER	%	CAPITAL EXPENDITURE (CAPEX)	%	OPERATING EXPENDITURE (OPEX)	%
ELIGIBLE 62.01	91.473.067,41€	98,11%	7.484.698,52€	100%	68.349.507,65€	98,65%
ELIGIBLE 85.5	1.758.618,11€	1,89%	- €	0%	903.022,07€	1,30%
NOT ELIGIBLE	- €	0%	- €	0%	27.513,21€	0,05%
TOTAL	93.231.685,52€	100%	7.484.698,52€	100%	69.281.541,43€	100%

B4 SUSTAINABILITY POLICY (CG4)

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.

It 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.

- The purpose of establishing policies in the context of sustainable development is to create value, which, through the achievement of the vision of business excellence, meets the Company's social and environmental commitments and responsibilities.
- The Sustainable Development approach concerns the EP-SILON NET Group, its people (Management - Employees), and other stakeholders. It is disseminated and adopted by Group companies, enhancing their competitiveness and aiming to create value for the benefit of stakeholders.
- Within the framework of the existing Sustainable Development Policy, we are committed:
- 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 clients, to form not just formal business transactions, but to build strong relationships of cooperation and trust.
- in terms of products, technologically advanced and reliable software systems that provide innovative solutions and security.

B5 } SUSTAINABLE DEVELOPMENT STRATEGY

The Group's Sustainable Development strategy aims to create long-term and sustainable value for employees, society, shareholders and other groups of its Stakeholders. It is implemented through the three key principles, which are inextricably linked to each other and relate to the **Environment**, **Society** and good **corporate governance** and operation.

Sustainable Development is the driving force through which the Company aspires to remain competitive in the long term, to face modern challenges and, by developing appropriate partnerships, to contribute to a new efficient and inclusive growth model, as reflected in the international environment through the Global Sustainable Development Goals.

B6 IMPLEMENTATION OF SUSTAINABLE DEVELOPMENT STRATEGIES

- **Materiality Principle:** We identify and discuss the substantive issues that reflect our significant economic, environmental and social impacts and influence the decisions of our Social Partners.
- **Social Partner Participation Principle:** Through an open and structured consultation, we seek to build quality relationships of trust and cooperation with our Social Partners, in order to jointly contribute to Sustainable Development.
- **Accountability Principle:** We implement our commitment to transparency and regular information to all our Stakeholders by publishing annually our Sustainability Report on our non-financial performance.

B7 SUSTAINABLE DEVELOPMENT SURVEILLANCE (C-G2)

EPSILON NET maintains the responsibility of monitoring the faithful implementation of the Sustainable Development Policy 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 EPSILON NET is carried out by the Board of Directors of the Company.

C. ENVIRONMENT



Climate change is a reality that generates multiple and multifaceted crises that we are called upon to address as a society on a global level. As an environmentally and socially sensitive Group, we take responsibility to contribute to solutions that respond to the critical challenges with sustainable consumption as a key objective.



C1

DIRECT EMISSIONS (C-E1), INDIRECT EMISSIONS (C-E2), ENERGY CONSUMPTION AND PRODUCTION (C-E3)

In the context of tackling climate change, the company has created good practices that are adopted by all Group employees. Initially, and with regard to the management of heating, we behave as follows:

1) We have set a constant temperature on the thermostats of the central air conditioning units of our buildings (Syngrou - Melissia - Pylea) as follows:

- In the winter season, a constant temperature of 22°C
- In the summer season, a constant temperature of 24°C

This practice is based on the fact that with each degree that heating or cooling is increased, energy consumption increases by about 5-10%.

It is noted that the other buildings of the subsidiaries do not have central heating and cooling but operate with

autonomous split systems.

2) Turn off all computers and monitors when employees leave (with the exception of units that need to be on all the time) as the devices are still consuming power, even when they are off but in standby mode.

3) The facilities department in the Group's buildings ensures that the lights are turned off when the employees leave, while, during the day, it checks the areas from which employees or visitors have left.

4) We are also targeting two other actions that can make an effective contribution:

- a. Existence of a constant maintenance schedule for the autonomous air conditioners and the central heating/cooling units, because their proper operation reduces energy consumption.



b. Replacing light bulbs with economical ones, which consume up to 5 times less energy than conventional ones and also guarantee a longer lifetime.

Total fossil fuel emissions consumed by the Group's company vehicles and facilities in 2023 amounted to 185.91 tonnes of CO₂e, while CO₂e emissions resulting from electricity consumption amounted to 406.64 tonnes.

One of our goals is to gradually replace some of our conventional vehicles with hybrids, making our fleet more environmentally-friendly. Understanding the needs arising from climate change and through specific guidelines and incentives to the human resources of the companies, we are trying to reduce energy consumption. In this direction, the imminent transfer of the company to a new modern building is planned, which we report on below. It is known that our new offices will be located in an existing building for which we intend to carry out a radical renovation, with all the modern standards that affect the working operation, environmental sensitivity and energy saving.

We intend to include our new building in the projects that will stand out in the city of Thessaloniki, to incorporate everything that is modern in terms of engineering and architectural design. The aim of the architectural design will be the aesthetic and functional upgrading of the building spaces, combined with the improvement of the working environment, the integration of new technologies and the reduction of energy consumption.

We aim to create a green building with high standards. Indicatively, we consider that our design will include:

- Creation of indoor and outdoor bicycle parking and changing rooms
- Planting of the surrounding area improving the micro-climate

- No smoking signage
- Energy glazing panes
- Development of a central collection area for recyclable materials and infrastructure on each floor.
 - Use of materials with a low-energy footprint
 - Use of paints and coatings with low emissions of volatile organic compounds, as well as adhesives, sealants, flooring, suspended ceilings, walls, thermal and acoustic insulation with the same properties.
- Infrastructure for electric car chargers in car parks
- Use of suitable taps and fittings with very low water consumption
- Office lighting and air conditioning control system with presence sensors.
- Sensor-based parking lighting control system.
- Use of very low energy consuming luminaires.
- Electricity consumption meters for air conditioning, lighting and sockets.

In addition, in the context of reducing indirect greenhouse gas emissions (CO₂, NO_x, etc.) from the combustion of fossil fuels for electricity production, but also to reduce its energy costs, the EPSILON NET Group is looking for a partner to participate in a program to purchase energy produced by a photovoltaic park. The main objective of our actions is to reduce our environmental footprint and to participate more and more actively in the global clean energy revolution.

At the same time, remote working is also strengthened after the end of the compulsory measure. The Group's companies, by addressing the environmental issue holistically, indirectly intervene in the fuel consumption of employees, preventing them from travelling to and from the company, while at the same time reducing their energy consumption.

C2 WASTE MANAGEMENT (A-E3), WASTE DISPOSAL (A-E4)

According to the scope of their activity, the companies of the EPSILON NET Group are not among those that cause a significant burden on the environment or produce a large volume of waste or waste water.

However, understanding the importance of protecting the environment, the Group has taken specific actions to improve its environmental performance, even through its partners.

In this context, we have signed a frame agreement for e-recycle (device recycling program) with a hardware provider company.

Through this cooperation, we are helping to reduce and better manage e-waste, which is estimated at tens of millions of tonnes per year - globally - of which less than 20% is recycled.

The given minimum waste water discharge is sought to be done in terms of green management through tonner recycling program, recycling of all lead acid batteries through authorized companies. In addition, at the fleet maintenance level, the partner vehicle rental companies recycle old batteries when they are replaced.



C3 WATER CONSUMPTION (SS-E3)

The total volume of water consumed in the facilities of EPSILON NET Group companies amounted to 2,051.06 cubic meters, according to the invoices of the local water supply and sewerage companies.

However, by monitoring the developments of climate change from the role of an active player, the Group's Human Resources Department raises awareness among all employees and attempts to structure a logic of sustainable and careful consumption.

C4 RISKS AND OPPORTUNITIES FROM CLIMATE CHANGE (A-E2)

All of the above leads us to understand that climate change, in addition to the risks, brings many opportunities.

So, we are taking a series of actions to address the risks arising from climate change. The Group implements actions aimed at upgrading and improving its building stock and technological infrastructure.

Some of these actions are:

- i) The installation of an electricity metering system
- ii) Replacing lamps with new LED technology
- iii) The installation of an automatic lighting system in public areas



D. SOCIETY





D1 OUR PEOPLE ARE OUR STRENGTH

The national and European distinctions for the working environment, as well as the awards for the best working environment in the Technology Sector, demonstrate the long-term and continuous effort for a working culture that respects everyday life, but also constitutes a fertile ground for the achievement of employees' goals.

Offering the tools, training, support, safety and guidance, the daily goal is for everyone as a team to be able to achieve high goals and continuous development, with a common passion and vision!

The companies of the EPSILON NET Group comply with all measures and obligations regarding the application of the provisions of Part 11 of Law no. 4808/2021 to prevent and address all forms of violence and harassment, including gender-based violence and harassment and sexual harassment, therefore, at the beginning of 2023, it drafted a Policy on Combating Discrimination, Violence and Harassment at Work, which, among other things, provides for a procedure for filing and examining complaints. Through this, the company is committed to maintaining a working environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a working atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including violence and harassment. Therefore, the Company expects that all relationships between individuals on its premises will be

professional and free from discrimination, prejudice, violence and harassment. The Company has developed this Policy to ensure that all of its employees can work in an environment free from violence, unlawful harassment, discrimination and retaliation and will make every reasonable effort to ensure that all individuals bound by the Policy are familiar with it and are aware that any complaint in relation to a breach of the Policy will be investigated and resolved appropriately. It is expressly and unequivocally stated that all forms of discrimination, violence and harassment that occur in the course of work, whether related to or arising from work, are strictly prohibited.

Reinforcing the above and with respect to uniqueness and adhering to an equal opportunities policy, EPSILON NET Group has signed the Diversity Charter which aims to serve as a commitment to prevent discrimination in the business sector and to implement equality, equal opportunities and diversity in every work environment in Greece. The main pillars that constitute Diversity are: Gender, age, race and colour, disability and chronic condition, national and ethnic origin and sexual orientation.

The EPSILON NET Group of Companies is an equal opportunities employer and is committed to its human resources to make every effort to uphold the value of respect for diversity. It is the policy of the Group to ensure equal employment opportunities without discrimination based on race, colour, religion, creed, age, sex, sexual orientation, national origin, citizenship, disability, personal status, union activity, pregnancy (including unlawful discrimination based on legally protected pregnancy/maternity leave), retired status, or any other characteristic protected by law.



WOMEN EMPLOYEES, (C-S2),

WOMEN EMPLOYEES IN MANAGERIAL POSITIONS (C-S3), STAFF MOBILITY (C-S4), GENDER PAY GAP (A-S3), CEO-EMPLOYEE PAY RATIO (A-S4), VARIABLE PAY (A-G4)

EPSILON NET Group, based on its policies, provides equal opportunities to all employees or candidates, male or female. There is no discrimination at any level, including on issues of diversity or unequal treatment in employment, age, gender, sexual orientation, religion, etc.; the principle of respect is fully supported, women's professional development is encouraged, equal opportunities in terms of pay and career development are provided.

Our people-oriented approach is being demonstrated in practice as the Diversity Charter was signed in 2022. The market-wide charter can serve as a commitment to prevent discrimination and to implement equality, equal opportunities, and diversity.

The employees per company, in the year 2023, were distributed as follows:

HUMAN RESOURCES 2023	MEN	WOMEN	TOTAL	MEN	WOMEN
EPSILON NET A.E.	168	185	353	48%	52%
EPSILON HOSPITALITY A.E.	24	13	37	65%	35%
EPSILON HR A.E.	90	67	157	57%	43%
EPSILON SUPPORT CENTER A.E.	7	7	14	50%	50%
EPSILON SINGULARLOGIC A.E.	333	224	557	60%	40%
TECHNOLIFE E.Π.E.	8	10	18	44%	56%
SYSTEM SOFT A.E.	10	11	21	48%	52%
IQOM A.E.	20	11	31	65%	35%
PROFESSIONAL COMPUTER SERVICES ANONYMH ETAIPEIA	15	19	34	44%	56%
EPSILON CSA A.E.	25	17	42	60%	40%
DIGITAL 4U A.E.	26	26	52	50%	50%
EPSILON SUPPORT CENTER ATHENS A.E.	8	8	16	50%	50%
KINITRON E.Π.E.	1	1	2	50%	50%
DATA COMMUNICATION	67	43	110	61%	39%
BOOK ONLINE NOW	7	3	10	70%	30%
HOTELIGA	2	6	8	25%	75%
HOTEL AVAILABILITIES	6	3	9	67%	33%
FBC	0	1	1	0%	100%
SCAN	19	7	26	73%	27%
OROSIMO	23	7	30	77%	23%
DIGINET	10	8	18	56%	44%
NETERA	1	0	1	100%	0%
ΑΠΥ	29	0	29	100%	0%
2023	899	677	1576	57%	43%
2022	715	597	1312	54%	46%
2021	498	434	932	53%	47%
2020	309	254	563	55%	45%

During FY 2023, the following figures were captured and categorized:

By contract type & by region for 2023:

HUMAN RESOURCES	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
ATHENS	543	343	886			
For an indefinite period	539	339	878	99%	99%	99%
Fixed-term	4	4	8	1%	1%	1%
THESSALONIKI	310	276	586			
For an indefinite period	297	264	561	96%	96%	96%
Fixed-term	13	12	25	4%	4%	4%
COUNTRYSIDE	60	44	104			
For an indefinite period	53	40	93	88%	91%	89%
Fixed-term	7	4	11	12%	9%	11%
GROUP	913	663	1576			
For an indefinite period	889	643	1532	97%	97%	97%
Fixed-term	24	20	44	3%	3%	3%

By level of studies for 2023:

STUDIES	MEN	WOMEN	TOTAL	MEN	WOMEN
BASIC	0	2	2	0%	100%
INTERMEDIATE	123	127	250	49%	51%
HIGHER EDUCATION	502	527	1029	49%	51%
MASTER'S DEGREE	137	155	292	47%	53%
PhD	3	0	3	100%	0%
GROUP	765	811	1576	49%	51%

By age group for 2023:

AGE GROUP	MEN %	WOMEN %	TOTAL
<30	10.85%	9.33%	20.18%
30-50	32.17%	26.71%	58.88%
50+	14.09%	6.85%	20.94%
TOTAL	57.11%	42.89%	100.00%

In addition, the new recruitments by region for 2023 are as follows:

ΝΕΕΣ ΠΡΟΣΛΗΨΕΙΣ	ΑΝΔΡΕΣ	ΓΥΝΑΙΚΕΣ	ΣΥΝΟΛΟ	ΑΝΔΡΕΣ	ΓΥΝΑΙΚΕΣ
NEW RECRUITMENTS	MEN	WOMEN	TOTAL	MEN	WOMEN
ATHENS	103	60	163	63%	37%
THESSALONIKI	56	40	96	58%	42%
COUNTRYSIDE	19	20	39	49%	51%
GROUP	178	120	298	60%	40%

In addition, EPSILON NET Group also encourages the professional development of women, providing equal opportunities in terms of pay and promotion. The number of women employed in managerial positions increased significantly in the year 2023 and this is not a symbolic gesture in the context of inclusion, but a reality that is developed through equal opportunities policies for all, something that EPSILON NET has been adopting for years. This year's percentage of women employed in managerial positions is as follows:

GROUP	WOMEN	in managerial positions
2023	44%	46%
2022	46%	44%
2021	47%	25%
2020	45%	21%

Regarding the staff departures during the years 2021 & 2023, the picture from all the companies of EPSILON NET Group is recorded as follows in the following 2 tables, aggregated and detailed by reason of departure:

YEAR	VOLUNTARY	NON-VOLUNTARY
2022	7%	2%
2023	7,8%	1,1%

REASON FOR MOBILITY	2022	2023
OTHER	1	2
DISMISSAL	15	10
END OF THE CONTRACT	20	12
RETIREMENT	-	3
VOLUNTARY	102	87
TOTAL	138	114

The pay gap between the average basic salary of women and men in the financial year 2023 is shown in the table below.

YEAR	GENDER PAYGAP	MEN	WOMEN
2023	20%	32.654	26.212
2022	26%	31.229	22.967

The ratio in the table below refers to the numerical ratio between the annual total remuneration of the CEO and the median of the total remuneration of a company's employees.

CEO PAY RATIO
11:1

CEO	OTHERS	RATIO: 11,25
287.164	25.514	

Variable pay in the year 2023 was zero.

D3 TRAINING OF EMPLOYEES (C-S5), EMPLOYEE TRAINING COSTS (A-S2)

In the context of the dynamic environment of new technologies, IT and digital transformation of the organisations in which we operate, we ensure the continuous training and education of our people, enabling them to develop competences related to their field of employment.

In 2023, €251,560 were invested for 20,025 man-hours of training. This investment is essential as it is in line with our understanding that lifelong learning and further training of our people is a key component of addressing the increasing number of modern challenges.

D4 HUMAN RIGHTS POLICY (C-S6)

EPSILON NET Group supports and enhances fundamental human rights, both inside and outside the Group and demonstrates its commitment by implementing responsible practices in the workplace.

The Group's activities are conducted in an ethical, fair and

legal and regulatory compliant manner. With respect for human rights, employees and external partners are treated in accordance with the basic principles of this Declaration of Human Rights, which aims to avoid improper human rights-related conduct.



D5

DECLARATION OF HUMAN RIGHTS

EPSILON NET Group is fully committed to its responsibility to respect human rights.

Maintaining the highest ethical standards throughout its operations is an integral part of our values and ethical principles, as outlined in our Code of Business Conduct.

The basis of our internal documents, including our Code of Business Conduct, policies and procedures that we develop, reflects our Group's commitment to respecting human

rights. This commitment is guided by the core principles of our culture and follows a wide range of international standards that we embrace, such as the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. We strongly support these contracts within our working environment and in all Group companies.

As a Group, we believe in the fundamental dignity of every human being and their right to live and work in safety, without fear of oppression or coercion. Our regulations, together with our Code of Business Conduct and Human Resources Policy, emphasize responsibility, integrity, and values-based decision making, and set our standards for conducting our business practices ethically and consistently with our ethical principles.

These principles and standards shape our interactions with colleagues, customers and stakeholders, suppliers, society, communities, and our shareholders. In considering our obligations as a Group with an expanded presence and customer base, we have incorporated into our Code of Business Conduct, corporate policies and procedures that support how these principles should be put into practice:

- **Equal employment opportunities and anti-discrimination:** The Group is committed to creating a working environment that promotes the personal and professional development and full realization of the potential of its employees, regardless of age, nationality, disability, national origin, ancestry, race, religion, gender, sexual orientation, gender identity and/or expression, genetic information or any other protected minority status. Discrimination towards any of these classifications is not permitted.
- **Combating harassment:** The Group condemns any form of workplace, sexual, online or other form of harassment against any employee by any person, including other employees, temporary or internship employees, contractors, suppliers, customers, transporters or visitors.
- **Diversity and inclusion:** The Group is committed to maintaining a working environment that values diversity, equality and inclusion. Employees are expected to respect each other, customers, suppliers and others who do business with us, regardless of their professional, employment or interpersonal differences and all dimensions of disputes.
- **Data protection:** As set out in the Code of Business Conduct and the applicable privacy and confidentiality policies and statements, the Group respects the privacy rights of individuals in accordance with the applicable legal framework, and uses personal data in accordance with the applicable legal framework and only for business and employment purposes.
- **Protection in case of retaliation:** Protection is provided to the complainant and any form of retaliation or retribution to employees or individuals who have reported concerns, sought guidance or cooperated in an investigation is prohibited. Any employee who retaliates is subject to disciplinary action.

- **Working standards:** The Group is committed to a fair, supportive, and inclusive workplace. This commitment includes compliance with applicable laws on working conditions and rights in the jurisdictions in which we operate. The Group complies with the laws related to the establishment of labour associations and employee representatives. Forced labour or activities that support human trafficking are strictly prohibited.
- **Health and safety:** Employees and others who work or visit our facilities are expected, in all cases, to maintain safe and healthy working conditions and to comply with published operating practices and procedures as defined and indicated as appropriate. The Group also maintains programmes to safeguard people travelling in the context of their work and takes increased measures to prevent and combat the spread of epidemics or pandemics.
- **Remote working:** All the above mentioned principles and practices are applicable even in times of crisis where new data and situations require the adaptation to new ways and conditions of work for our human resources, e.g. remote working. In these circumstances, we ensure that all the above-mentioned principles are in place and continue to be applied, providing where necessary all the necessary means to carry out employees' duties.
- **Contribution to the community:** We recognise our impact on the communities in which we operate and are committed to engaging meaningfully with stakeholders



in those communities to ensure that we listen, learn and take their views and needs into account when conducting our business activities. Where necessary, we contribute and, where useful and necessary, engage in dialogue with stakeholders on human rights issues related to our business activities.

1. Scope and implementation

The Group consistently pays attention to the way its business activities may affect human rights and does not engage in activities or relationships where there are clear indications of human rights violations.

Our governance, prevention and management measures have a particular focus on the following areas of activity:

- respect for the human rights of employees and society
- avoiding human rights violations through our business relationships with customers, suppliers and partners

To ensure effective implementation, we are committed to providing mandatory training on the Declaration of Human Rights to all employees on an annual basis.

1.1. Employees

The Group aims to be an "employer of choice" for current and future employees (Best working places). The subject of human rights in this context is broad and includes, among others, the prohibition of forced and child labour, the commitment to fair pay and working hours, ensuring freedom of association, equality, respect and freedom of action.

In general, our approach is based on the International Labor

Organization's Declaration on fundamental principles and rights at work, as well as the applicable labour laws in the different jurisdictions in which we operate. Among others, the Group is committed to the following standards:

1.1.1. Health and well-being

We proactively address psychosocial risks and the risks that lead to low productivity and high rates of absenteeism and presenteeism with modern tools of Employee Assistance Programs. A modern system of prevention and protection in the workplace is in place to ensure continuous health and safety at work.

By increasing health and safety awareness and providing direct and indirect access to medical care for its employees, the Group contributes to the reduction of work-related accidents and illnesses.

1.1.2. Protection of personal data

According to the applicable legislation, employees' personal data are considered sensitive data and, therefore, special protection is required when handling, processing (including storage and deletion), transferring, disclosing and/or sharing such data.

All those who process employee data are required to know, comply with and apply internal and external data protection regulations.

The handling of employees' personal data complies with the relevant laws on the protection of individuals with regard to the processing of personal data and the free movement of such data, national data protection provisions and the relevant laws.

1.1.3. Diversity and inclusion

The Group is committed to providing equal employment and promotion opportunities to all employees, respecting the rights of minorities and women, without discrimination.

All employees are evaluated on the basis of their performance (assessed against specific work-related behavioural indicators and objectives) and understand and support honest, fair and corrective feedback from their supervisors and colleagues.

In line with our Code of Business Conduct, we are committed to treating everyone with dignity and respect, regardless of their job or working conditions.

1.1.4. Remuneration

Total remuneration consists of fixed monthly salaries, benefits and variable performance-based remuneration linked to profitability and other business performance and objectives at individual and business level.

The Group provides, and is committed to continue to provide, a fair comprehensive remuneration framework that ensures a decent living and remunerates employees competitively in relation to the industry and the local labour market in accordance with the applicable labour legislation, while efforts are made to attract and retain talented executives.

1.1.5. Freedom of association

The Group complies with all applicable laws, rules and regulations on collective agreements, negotiations and freedom of association, as well as global conventions such as International Labour Organization (ILO) Conventions 87 and 98.

1.1.6. Forced labour and child labour

The Group has zero tolerance for child labour or forced labour in all its business activities in and outside the country.

1.2. Customers

To identify, prevent and mitigate adverse impacts on human rights, we have integrated human rights issues (e.g. labour practices, forced labour, children's rights, health and safety of employees and communities, etc.) into our environmental and social due diligence process and pay attention to their implementation.

Our clients operate in all sectors of the economy, including areas where the risk of negative impacts on human rights may be high. In this context, we seek to understand the environmental and social risks associated with a customer or transaction just as we do for any financial risk.

In addition, due diligence is complemented by direct



interaction with customers and external tools/databases available to support the risk assessment process, considering when collaboration with independent experts is required.

1.3. Suppliers

A supplier is an entity that does not belong to the Group and provides goods and/or services to the Group.

We strive to work with suppliers whose human rights policies and practices are in line with our own. Suppliers are expected to respect the human rights of their employees, offer equal employment opportunities to all and not tolerate discrimination or harassment.

We make an effort to control and we expect our supplier partners and their supply chains to comply with all applicable laws and regulations in the jurisdictions, countries and regions where they operate, especially laws on labour, e.g. avoiding forced or child labour, adhering to workplace safety and health rules and standards, and offering fair pay and insurance to employees.

We maintain long-term relationships with our suppliers wherever possible. If a partner fails to comply with the ap-

plicable laws and regulations and/or our requirements, upon notice we will insist on improvements and reserve the right to terminate the relationship if our standards are not met and any identified deficiencies are not addressed.

1.4. Complaints and reporting mechanisms

The Group seeks to engage in meaningful consultation with stakeholders as part of its human rights due diligence process and encourages all stakeholders to contact the organization in the event that they have clear evidence of non-compliance with the relevant procedures in an effort to prevent and/or avoid any human rights harm or wider involvement in a human rights issue.

Customers and the public can contact us or submit complaints to info@epsilon.net.gr so that they can be investigated by the relevant services.

Any complaints, including those concerning human rights, are initially dealt with in accordance with the complaints procedure.



COLLECTIVE LABOUR AGREEMENTS (C-S7)

In the EPSILON NET Group, in 2023, 98% of employees were covered by individual employment contracts that exceeded the minimum terms of the National General Collective Labour Agreement (EGSSE). Furthermore, no complaint or grievance related to any issue of forced labour has been recorded in the Group's employee grievance management systems.

CLA	YES	NO
2023	98%	2%

D7 STAKEHOLDER PARTICIPATION (C-S1)

We systematically communicate and engage with Stakeholders, which are determined based on the impact of our business. We have moved on to accurately mapping them and mapping our relationship with them. The Stakeholders belong either to the Group's internal environment (shareholders, employees, commercial network), or they exist and operate in the external environment, Greek or international (regulatory authorities, SMEs, local authorities, suppliers, partners, customers, central government, academia, NGOs).

Stakeholders	Two-way communication	Priorities - Issues for dialogue
Shareholders	<ul style="list-style-type: none"> Participation in investment forums Designated Shareholder Meetings Targeted Communication 	Economic Development / Results, Management, Investment Plan, Strategic Options, Socio-Economic Developments

Highlight:

1-on-1 meetings were held with a large number of investors either remotely using special communication platforms (Zoom, Teams, Webex) or in our facilities in Thessaloniki and Athens and in meetings abroad, such as Israel, Denmark, Germany for direct contact with shareholders and interested investors.

Stakeholders	Two-way communication	Priorities - Issues for dialogue
NGOs / Civic Organizations / Collective Entrepreneurship Bodies	<ul style="list-style-type: none"> Partnerships Support Meetings 	Education & Training Volunteering, Health & Environment, Social Contribution

Highlight:

After an extensive round of discussions at the Group level and a corresponding maturation of the issue, it was signed in cooperation with the Cell of Alternative Youth Activities, and a diversity charter was signed.

Stakeholders	Two-way communication	Priorities - Issues for dialogue
Employees	<ul style="list-style-type: none"> Employee Opinion Survey Internal Communication / ESS Organization of Events Benefits / Education 	Education, Health & Safety, Equal Opportunities for Career Development

Highlights:

The Human Resources Department communicated to all the people of the EPSILON NET Group of Companies, distributing a comprehensive evaluation questionnaire, in order to capture the opinions of everyone.

Stakeholders	Two-way communication	Priorities - Issues for dialogue
Academic Community	<ul style="list-style-type: none"> • Support for Scientific Programs • Educational programs in cooperation with domestic and foreign institutions • Provision of software to domestic educational institutions 	Education, Innovation, IT, Accounting and Payroll Applications, CRM Applications

Highlight:

In the context of our social contribution and our substantial contribution to the country's educational institutions, we provide free software licenses to Higher Educational Institutions, Public and Private Institutions (IEK) and Vocational High Schools.

In addition, we are able to contact the following interested parties:

Stakeholders	Two-way communication	Priorities - Issues for dialogue
Central Government / Local Government	<ul style="list-style-type: none"> • Meetings • Participation in Conferences/Seminars 	Internet Security, Economic Development, Environment, Investment in Technology & Environment, Investment in Technology & Infrastructure, Support to Local Economy, Social, Cultural & Educational Institutions
Customers (Individuals - Businesses)	<ul style="list-style-type: none"> • Customer Satisfaction Surveys • Level of Customer Service • Online Contact • Complaints Hotline 	Technical Issues for Products & Services, Quality of Service Telecommunication Charges
MEDIA	<ul style="list-style-type: none"> • Press conferences • Meetings • Press Releases & Press Releases Presentations 	Administration, Economics & Management Regulatory Issues, Quality of Service, Infrastructure, Technology & Commercial Results Innovation, Social Contribution, Environmental Operations
Suppliers	<ul style="list-style-type: none"> • Working visits • Continuous Update & Support 	Procedural Issues, Financial Issues, Timely Delivery, Safe Delivery Conditions for Employees
Regulatory authorities	<ul style="list-style-type: none"> • Participation in Consultations • Participation in Surveys • Participation in Conferences 	Network Infrastructure & Investments, Regulatory Obligations, Quality of Services & Service and Service Quality, Market - Competition, Business Continuity Issues
Commercial Network	<ul style="list-style-type: none"> • Communication System • Commercial Conferences • Meetings with Sales Managers • Continuous Provision of Information & Support 	Corporate Governance, Knowledge Transfer & Good Practices, Initiatives to Support the Needs of Local Communities, Training in New Products & Services, and the development of new products and services. Services, Customer Service, Recycling, Goals and Ecological Consciousness

D8 ✓ SUPPLIER EVALUATION (C-S8)

The management of EPSILON NET's suppliers has been enhanced by the feedback of the behaviour of each supplier to each division that has requested this cooperation. This feedback is continuous and is the result of ongoing and continuous evaluation of suppliers. The Procurement Division is based on a specific evaluation policy which examines the quality of the services offered and the financial offers.

The evaluation is part of the EPSILON NET Group's effort for continuous improvement of its products and services.

New suppliers are assessed on a qualitative and strategic level before being included in the list of approved suppliers. These partnerships are reviewed periodically to ensure the validity and updating of supplier data and to ensure their adequacy.

D9 ✓ QUALITY AND SAFETY OF PRODUCTS (SS-S1)

We achieve our business objectives within the framework of our policy (<https://www.epsilonnet.gr/content.aspx?id=4650>) by choosing the ISO 9001:2015 standard as the system of organization, operation and documentation, constantly pursuing the continuous improvement at all levels. Basic elements of the operation of the companies of the EPSILON NET Group are:

- The excellent internal organization of the company with increased efficiency and performance
- The monitoring of developments in the field of information technology for the search of new technological products at competitive prices from reliable suppliers,

with the aim of transferring these competitive advantages to customers

- The commitment to accurately diagnose and meet the needs of clients
 - The management's commitment to the implementation of ISO 9001:2015
 - The excellent customer service

For the above reasons, the company draws up an action plan every year, identifying the objectives and strategies for achieving them for the coming years.



D10 ✓ LABOUR LAW VIOLATIONS, FINES - DATA SECURITY AND PRIVACY BREACHES (SS-S4 | SS-S5)

During the year, there were no fines incurred as a result of legal proceedings related to labour law violations or data security and privacy breaches.

D11 ✓ HEALTH AND SAFETY PERFORMANCE (SS-S6)

100% of the Group's employees who are employed on a contract of an indefinite period or a fixed-term contract, part-time or full-time, participate in the occupational health and safety management system. In 2023, there was no event related to the indicator (0%).

D12 ✓ CUSTOMER SATISFACTION - CUSTOMER COMPLAINT HANDLING MECHANISM (SS-S8 | SS-S9)

The excellent customer service is an integral part of our mission. In this context, we have implemented practices whereby we try to get feedback in order to intervene effectively with a desire for self-improvement where necessary.

Every day, an invitation to participate is automatically sent to a random sample of 30% of customers who contacted the company (as part of their support) and, based on the responses, we identify any cases that have encountered a problem through one of our services.

This process is not only considered by us in the short term, during which the resolution of an issue is completed. The results are reviewed and analysed by the company's executives, who draw conclusions about the trends that are formed for our products through public service

D13 SOCIAL CONTRIBUTION ACTIONS

In 2023, the companies of EPSILON NET Group contributed to society in every possible way.

1. Volunteer Team

The activities of this year's Volunteerism and Community Service Week included the following:

- **Voluntary blood donation** - The Group's blood bank was significantly strengthened with 2 actions in Athens and Thessaloniki.
- **Christmas Bazaar** to support the foundation "The Smile of the Child" with original constructions, Christmas items and decorations, gifts created by the employees and volunteers of the "Creative Workshops" of the organization.
- **Sharing is Caring** - Collection of items for the daily and ongoing needs of the children of the "Smile" and their families.

2. Recycling - Implementation of integrated recycling and battery collection programs, reducing our environmental footprint.

3. Tree planting - Active participation in tree planting activities, contributing to the protection and restoration of the

natural environment.

4. Breast cancer information meeting

- In cooperation with the Association of Women with Breast Cancer "Alma Zois", information from the specialized doctor, the social worker of the Association and a volunteer - survivor of the disease.

5. You'll never walk alone - Provision of a psychological support hotline to the Group's employees.

6. Sea Side Cleanup - Organization of a beach cleanup action in Thessaloniki and Athens in cooperation with iSea.

7. We stand by the affected people of Thessaly - Dispatch of 25 tons of bottled water to the Social Welfare Directorate of the Thessaly Region, to be distributed to our fellow human beings who were in immediate need.

8. Stronger Every Day in Body and Mind - Providing online fitness and pilates programs to all employees.

9. Epsilon Net goes Running - Participation in the Race for the Cure Athens and the Thessaloniki Night Half Marathon.

10. International Women's Day - Information and awareness-raising on women's rights through an online meeting with Mrs. Sofia Nikolaidou, award-winning author.

D14 KEY MOMENTS 2023

30/01/23 Pylon Hybrid: The New Hybrid Era in Business

6/03/23 Epsilon Hospitality participates in ITB 2023, one of the largest tourism fairs in the world!

14/03/23 EPSILON NET: Acquisition of 80% of the company OROSIMO INFORMATION S.A.

23/03/23 Alfa Pharm S.A. has successfully adopted the new Galaxy Pharma platform from Epsilon SingularLogic & Epsilon CSA

27/03/23 EPSILON NET Group: Two top awards at the 25th Greek ICT Forum Greek ICT Award & ICT Jubilee

30/03/23 EPSILON NET Group was distinguished as Best Workplaces™ for Women Hellas 2023!

31/03/23 New NSRF 2021-2027: Online workshop of EPSILON NET Group for the digital transformation actions with the participation of the National Bank of Greece

2/05/23 EPSILON NET: Acquisition of 60% of the IT company "NETERA"

4/05/23 Informative Workshops of the HECC and EPSILON NET Group for the Digital Transformation Actions of the New NSRF

4/05/23 Signing of a binding agreement with the National Bank of Greece for the acquisition of a minority stake in EPSILON NET S.A.

8/05/23 EPSILON NET Group: 2nd place in the Best Workplaces 2023!

11/05/23 EPSILON NET Group: The Group's growth strategy and new products were presented at the Annual Panhellenic Event of the Partners Network

31/05/23 EPSILON NET: Acquisition of 60% of the company DIGINET

9/06/23 EPSILON NET: Completion of the transaction for the acquisition of a minority stake by the National Bank Group & signing of a Strategic Cooperation Agreement

20/06/23 EPSILON NET Group: 2nd place in the Best Workplaces Hellas 2023 & 9th consecutive year at the top!

22/06/23 Multiple distinctions for EPSILON NET Group at Cloud & Supply Chain Awards!

6/07/23 Award for EPSILON NET Group at the Education Leaders Awards 2023 for the provision of integrated educational services.

12/07/23 Epsilon Talent | Epsilon HR's new all-in-cloud solution is your best ally in recruitment!

13/07/23 New certification with 100% rating of Data Communication of EPSILON NET Group by Microsoft in the category of "Business Applications" solutions

17/07/23 EPSILON NET: Acquisition of 100% of the minority shares of Epsilon HR subsidiary



19/07/23 EPSILON SMART ERGANI ADVANCED - The upgraded solution for the Digital Job Card sets new standards in the market!

20/07/23 Epsilon Digital of the EPSILON NET Group is trusted by Greek businesses for electronic invoicing and transactions with the public sector (B2G)

26/07/23 EPSILON NET: Acquisition of 60% of the shares of SCAN INFORMATION SYSTEMS

11/09/23 Finance & Accounting Awards 2024 powered by Epsilon Net

21/09/23: EPSILON NET Group: "ICT Company of the Year" at the BITE Awards 2023

25/09/23: EPSILON NET Group: For the 4th year at the top of European Businesses, 6th place in Best Workplaces in Europe 2023 10/10/23: Online Workshop of the EPSILON NET Group and DIGINET for the support of the program "DIGITAL TRANSACTIONS" within the framework of the RECOVERY FUND, sponsored by NBG Pay 11/10/23: EPSILON NET Group at the top of global technological innovation!

The Group was awarded the "Epsilon Net: Transforming the Workplace into a Tech Haven" in the category "Best Place to Work Award (Private Sector)". In addition, the Deputy CEO of the Group, Mrs. Vasiliki Anagnostou, was honoured with the "Women in Tech Award (Private Sector/NGO)".

16/10/23: Epsilon Pay: the new integrated collection management service from the National Bank of Greece and the EPSILON NET Group

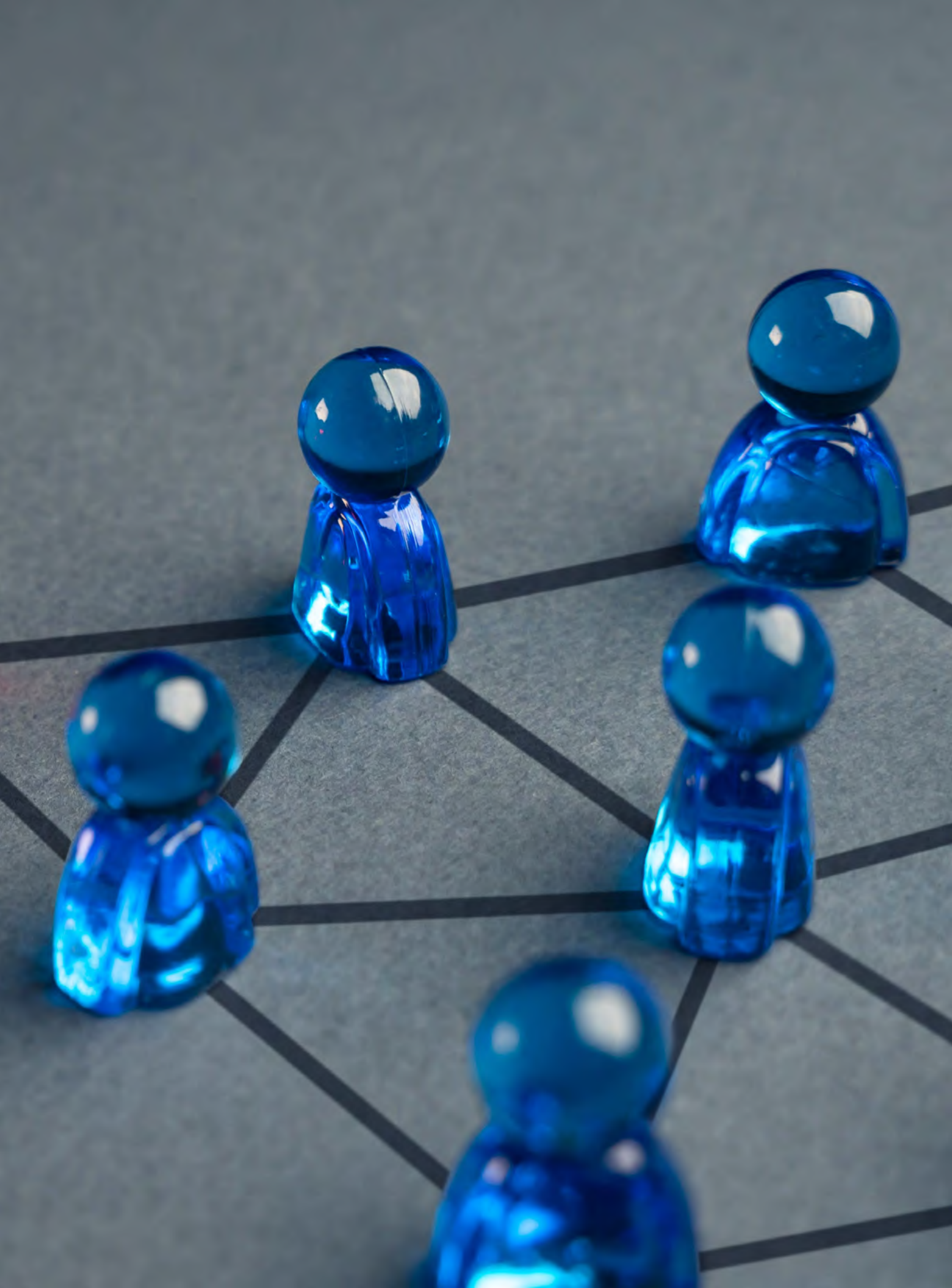
18/10/23: EPSILON NET Group: Top employer in Greece in the Technology sector, 1st place in the Best Workplaces in Technology 2023 24/10/23: EPSILON HOSPITALITY: Gold Award as the leading technology provider at the Greek Hospitality Awards.

23/11/23: EPSILON NET Group: Dynamic expansion of Epsilon SingularLogic in specialized information systems for the supply chain industry

04/12/23: EPSILON NET Group: epsilon Smart, the most complete and reliable e-invoicing application for small businesses, has arrived in Cyprus!

E. GOVERNANCE







Corporate Governance aims at the responsible operation of the Group, the sustainability of its companies and the safeguarding of the interests of Shareholders and Stakeholders. EPSILON NET sets the strategy and develops the general guidelines, policies and principles that govern the operation of all subsidiaries. The company is structured in a way that facilitates the making and implementation of decisions in the context of the implementation of the Group's strategy.

The EPSILON NET Group, by decision of its Board of Directors, taken on 16 July 2021, decided to replace the existing Corporate Governance Code and adopted the Greek Corporate Governance Code (CSGC) of June 2021, with the deviations included in the Corporate Governance Statement for the year 2023.

The CSGC has been prepared by the Hellenic Corporate Governance Council (HCGC), which is a body of recognized prestige in accordance with article 17 of Law 4706/2020 in conjunction with the decision of the Board of Directors of the Hellenic Capital Market Commission under number 916/07.06.2021. The Greek Corporate Governance Code is adapted to Greek legislation and business reality and has been drafted on the basis of the principle of "comply or explain", thus including issues that go beyond existing laws and rules.

E1 ✓ COMPOSITION OF THE BOARD OF DIRECTORS (C-G1)

The Board of Directors is responsible for the administration and representation of the Company, the management of its assets and the general pursuit of its purpose. It decides on all general issues concerning the company, within the framework of the corporate purpose, with the exception of those which, according to the law and the Articles of Association, belong to the exclusive competence of the General Meeting.

The Board of Directors of the Company is composed of persons of good moral and reputational standing and has a sufficient number of members and an appropriate composition, which reflects the knowledge, skills and experience required

for the exercise of its responsibilities, in accordance with the business model, the strategy and the sustainable development goals of the Group. In this context, the Vice Chairman of the Board of Directors of EPSILON NET and supervisor of the compilation of the Sustainable Development Report 2023 participated in a series of relevant seminars. It also ensures that the members of the Board of Directors understand and comprehend the corporate governance regulations of the Company, as they result from the Law, the Corporate Governance Code and the Code of Professional Conduct that the Company applies.

The Board of Directors of the Company, as reconstituted at its meeting on 07/10/2024, is as follows:

- **MICHOS IOANNIS**, *President and CEO*
- **MANIS PANTELEIMON**, *Vice President of the BoD*
- **ANAGNOSTOU VASILIKI**, *Deputy Managing Director*
- **KOUTKOUDAKIS IOANNIS**, *Member of the BoD*
- **PRASSAS VASILEIOS**, *Member of the BoD*
- **MICHALOPOULOS PASCHALIS**, *Member of the BoD*
- **GRIMPELAS ANDREAS**, *Member of the BoD*
- **DASKALOPOULOU AIKATERINI**, *Member of the BoD*
- **MARINOS GEORGIOS**, *Member of the BoD*
- **GKINOGLLOU DIMITRIOS**, *Member of the BoD*

The term of office of all members of the Board of Directors expires on 30/06/2025.

The Company shall ensure diversity and adequate gender representation on its Board of Directors and in general shall ensure equal treatment and equal opportunities, as well as the concentration of a wide range of qualifications and skills among the members of the Board of Directors.

Of the total number of Board members, 40% are non-executive members, 30% are independent & non-executive members & and 20% are women.

The Board of Directors met 42 times in the year 2023. The attendance rate of Board members at the 2023 meetings was 95%.

At the meetings of the Board of Directors whose subject was the preparation of the financial statements of the Company or whose agenda included items for the approval of which the General Meeting was required to adopt a decision with increased quorum and majority, in accordance with Law 4548/2018, the Board of Directors was quorate and at least two independent non-executive members were present.

The functioning of the Board of Directors is supported by two Committees:



Audit Committee

The Audit Committee is a Committee of the Board of Directors, consisting of three (3) non-executive members of the Board of Directors, two (2) of whom are independent and who meet the independence requirements of article 4 of Law 3016/2002 and article 9 of Law 4706/2020.

The members of the Audit Committee are appointed by the Board of Directors and the Chairman of the Committee is elected by its members and is an independent non-executive member of the Board of Directors. The term of office of the members of the Audit Committee lasts as long as the term of office of the members of the Board of Directors of the Company. The Audit Committee met eleven (11) times during the year 2023.

The main responsibilities of the Committee are as follows:

- The monitoring of the statutory audit of the individual and consolidated financial statements of the Company
- The monitoring of the financial reporting process
- The monitoring of the effectiveness of the company's internal control, quality assurance and risk management systems
- The provision of general guidance to the Internal Audit Directorate on the scope of work and activities to be audited
- To be informed on a regular basis on the progress of the work of the Internal Audit Division.

Remuneration & Nominations Committee

The Remuneration and Nominations Committee consists of three (3) non-executive members of the Board of Directors, of which at least two (2) are independent and meet the independence requirements of article 4 of Law 3016/2002 and article 9 of Law 4706/2020.

The Remuneration and Nominations Committee met eight (8) times during the year 2023.

The members of the Remuneration and Nominations Committee are appointed by the Board of Directors. An independent non-executive member is appointed as the Chairman of the Committee. The term of office of the members of the Remuneration and Nomination Committee lasts as long as the term of office of the members of the Board of Directors of the Company.

The tasks of the Remuneration and Nominations Committee are mainly as follows:

- To formulate proposals to the Board of Directors regarding the remuneration policy
- To formulate proposals to the Board of Directors on the remuneration of persons covered by the remuneration policy
- To examine the information contained in the final draft of the annual remuneration report, providing its opinion to the Board of Directors
- To identify and propose to the Board of Directors persons suitable for membership of the Board of Directors

The following regulations and policies are followed for the good governance of the Group:

1. Audit Committee Regulation
2. Regulation of Procedure of the Remuneration and Nominations Committee
3. Remuneration Policy
4. Internal Rules of Procedure
5. Internal Rules of Procedure of the Board of Directors
6. Code of Ethics & Conduct.
7. Suitability Policy for BoD Members
8. Sustainable Development Policy
9. Human Rights Policy
10. Policy against violence and harassment at work

E3 SUBSTANTIVE ISSUES (C-G3)

We consult with Stakeholders or their representatives in an inclusive and non-discriminatory manner and recognize that they have a direct impact and influence on our sustainable development. In the process of identifying substantive issues, we communicate with our Stakeholders in order to highlight the most important issues concerning our business, but also to record our response to their needs, concerns and expectations.

EPSILON NET, having read the guidelines and after evaluation of the substantive issues by the Board of Directors, presents the following table of substantive issues.

Substantive Issues	Limits within the Company	Limit outside the Company
Protection of Personal Data	Company Shareholders Commercial Network	Regulatory Authorities NGOs / Citizens' Organizations Central Government / Local Government Clients (Individuals - Businesses) Academic Community SMEs
Employee Health & Safety	Company Employees Shareholders Commercial Network	NGOs / Citizens' Organizations / SMEs
Safe Use of New Technologies	Company Employees Commercial Network	Regulatory Authorities NGOs / Citizens' Organizations Central Government / Local Government Clients (Individuals - Businesses) Academic Community / SMEs
Combating Corruption	Company Shareholders Commercial Network	Regulatory Authorities NGOs / Citizens' Organizations Central Government / Local Government Clients (Individuals - Businesses) Academic Community / SMEs
Avoiding Discrimination	Company Employees Commercial Network	NGOs / Citizens' Organizations / SMEs
Diversity and Equal Opportunities	Company Employees Commercial Network	NGOs / Citizens' Organizations / SMEs
Quality of Services	Company Employees Commercial Network	Customers (Individuals - Businesses) / SMEs
Profitability	Company Shareholders	MEDIA
Procurement Practices	Company Commercial Network	Customers (Individuals - Businesses) / Suppliers



ASSESSMENT OF INTERNAL CONTROL SYSTEM

About the Competence Assessment & Effectiveness of the Internal Audit System, the Audit Committee recommended to the Board of Directors the assignment of the relevant evaluation of the Internal Audit System of the Parent Company and its significant subsidiaries, with a reporting period from 17.7.2021 to 31.12.2022 to the audit firm "PKF EUROAUDITING S.A."

The Company, by decision of its Board of Directors, entrusted to "PKF EUROLEGTIKI S.A." (Independent Auditor) the

assessment of the adequacy and effectiveness of the Internal Audit System ("IAS") of the Company and its significant subsidiaries, with a reporting date of 31/12/2022, in accordance with the provisions of section j, par. 3 and par. 4 of article 14 of Law 4706/2020 and Decision no. 1/891/30.09.2020 of the Board of Directors of the Hellenic Capital Market Commission, as in force.

The Independent Auditor's work was performed in accordance with the International Standard on Assurance Engagements 3000 "Assurance Engagements Other Than an Audit or Review of Historical Financial Information". The conclusion of PKF EUROAUDITING, which is included in the final report evaluating the adequacy and effectiveness of the IAS dated 29/03/2023 states the following: "Based on our work carried out, as described above in the paragraph

"Scope of Work Carried Out", as well as the evidence obtained, regarding the assessment of the adequacy and effectiveness of the IAS of the Company and its significant subsidiaries, with a reference date of 31 December 2022, nothing has come to our attention that could be considered a material weakness of the Company's and its significant subsidiaries' IAS, in accordance with the Regulatory Framework".

E5 BUSINESS ETHICS POLICY (C-G5)

Based on its commitment to adherence to principles and values, Epsilon Net considered it necessary to strengthen its Internal Regulatory Behaviour System at all levels, by implementing a set of rules that will be respected and adhered to at all levels.

Adherence to the Code of Conduct further reinforces the common framework of principles that must be respected by all, regardless of sector and hierarchical level. It is an element that defines the corporate culture and ensures the healthy growth of both the Group and its members. It encourages

behaviour based on the best principles of business ethics and conduct, but also on the applicable legislation in the areas of human rights, working conditions, the environment and the fight against corruption. Its purpose is the guidance in making decisions in situations where dilemmas may arise regarding the correct way to behave and deal with issues related to the principles and rules of business ethics.

The Group seeks compliance with the principles of business ethics and conduct that it adopts in its relations with all its partners (e.g. suppliers and other external partners).

E6 DATA SECURITY POLICY - CUSTOMER PRIVACY (C-G6 | SS-S2)

The Management of EPSILON NET is committed to managing Information Security Management issues with the same responsibility and importance with which it treats the entire operations of the company. We believe that in this way, we maximize the benefits of the operation of the business, for

our customers and our employees.

The smooth operation of the organisation and the execution of its activities is based to an absolute degree on the smooth operation of its information systems and the protection of the information they process.

The ever-increasing emergence of factors that may lead to a breach of Information Security and disruption of the normal operation of the Organization, makes it imperative to adopt best practices and measures in order to reduce the chances of their occurrence.

For this reason, the Group has established an Information Security Policy which includes and describes:

- The technical security measures and techniques followed to protect equipment, software, data, telecommunications and the proper use of equipment and confidential information by users.
- The organisational - administrative measures regarding the roles and responsibilities of staff and external partners
- The physical security measures of the Organization's premises

The Information Security Policy has been revised to include full compliance with the requirements of the European General Data Protection Regulation (GDPR) and follows the international standard ISO 27001:2013. The Administration gives its full support to the Information Security Management System

according to the aforementioned international standard and in consultation with the staff is committed to defining objectives and goals which it will review at regular intervals so that it is always within the specifications it has set.

The correct and secure operation of the Group's information systems is based on the Group's 2 Data Centers in Pylea, Thessaloniki and Melissa, Attica, which have been certified with ISO 27001:2013.

The Group invests in new equipment of new technology and modern software in order to ensure to the maximum extent possible the safe and uninterrupted operation of its computer systems. In order to ensure the Group's Business Continuity, a comprehensive Business Continuity Plan has been developed, which, in addition to the Group's 2 Data Centers, also provides for the use of Microsoft Azure cloud computing resources. For this reason, the Group has committed the necessary resources to Microsoft Azure.

A summary of the results of the implementation of the Information Security Policy for 2023, in combination with the corresponding objectives for 2024, are shown in the table below:

Objectives 2023	Results 2023	Targets 2024
Availability greater than 99%	Availability 100%	Availability greater than 99%
Shielding against external cyber-attacks that can attack the Group's systems	No data breach incident	Increase in the use of Microsoft Azure Cloud infrastructure
Creation of a new integrated ERP operating infrastructure for the Group's companies	Supply of new modern equipment and installation and configuration of Galaxy ERP at the Datacenter of Melissa, Attica	Procurement of new equipment and software systems to increase the level of information security of the Group

In addition, during 2023, there were no cases where user data was used for secondary purposes or requested by government and law enforcement authorities and no fines were imposed.

E7 ✓ VIOLATIONS OF BUSINESS ETHICS (A-G2)

In 2023, there were no financial losses resulting from violations of business ethics.

OBJECTIVES 2023	RESULTS 2023	OBJECTIVES 2024
Zero incidents of corruption, unfair competition, anti-competitive behaviour, antitrust and monopolistic practices. Full compliance with legislation and regulations in a social and environmental context. Strengthen communication and education on anti-corruption policies and procedures.	Achieve 100%.	Zero incidents of corruption, unfair competition, anti-competitive behaviour, antitrust and monopolistic practices. Full compliance with legislation and regulations in a social and environmental context.

E8 ✓ POLICY ON COMPLAINTS OF MALFUNCTIONING (SS-G1)

The proper compliance according to the laws, institutional and supervisory rules and principles as well as with the best practices of the market, is an integral part of the corporate culture of the EPSILON NET Group.

The Group has developed a Policy against Violence & Harassment to ensure that all of its employees can work in an environment free from violence, unlawful harassment, discrimination and retaliation and will make every reasonable effort to ensure that all individuals bound by the Policy are familiar with it and are aware that any complaint in relation

to a breach of the Policy will be investigated and resolved appropriately.

Under the Policy, it is categorically stated that all forms of discrimination, violence and harassment that occur in the course of work, whether related to - or arising from - work are prohibited.

As part of the Policy, we encourage the reporting of all perceived incidents of discrimination, violence, harassment or retaliation, regardless of the identity or location of the perpetrator, and a procedure is established to receive and

examine complaints, under which appropriate mechanisms are in place to conduct an impartial, fair, timely, thorough and objective investigation.

Complaints of conduct in violation of this Policy are accepted in writing, anonymously or by name, and are investigated promptly and thoroughly. The investigation may include individual interviews with the parties involved and, where necessary, with people who may have observed the alleged

behaviour or may have other relevant information.

Any information collected, in any form, is kept in a relevant file in accordance with the provisions of Law 4624/2019 and the Personal Data Protection Policy.

The consultation and adoption of the European Whistleblowing Directive is expected in the near future. In this case, the current procedure may have to be changed.



E9 CRITICAL RISK MANAGEMENT (SS-G2)

Risk management is based on the definition of objective goals based on which the most significant events that may affect the Company are identified, the relevant risks are assessed and the response of the companies of the Group is decided.

Risk management is based on the definition of objective goals based on which the most significant events that may affect the Company are identified, the relevant risks are assessed and the response of the companies of the Group is decided.

Such risks are identified as risks from fire in the building, risks arising from an earthquake event, and risks arising from other similar emergencies. The above shall be recorded in the risk register.

The EPSILON NET Group of companies has established security volunteering teams which consist of people from the Group, who receive special and continuous training, in order to be able to deal with emergency situations and assist in such cases.

At the same time and in support of the above, the Directorate of Operations of the Group has made the recording

of instructions in emergency situations, which have been communicated to all employees working in the buildings of EPSILON NET Group companies, in order to maintain a high level of preparedness and efficiency in dealing with emergency situations.

The instructions that have been communicated to staff are as follows:

- Instruction for building evacuation
- Instruction in case of an earthquake
- Instruction in case of fire
- Instruction in case of flooding or leakage
- Instruction in case of a telephone threat

In the context of the assessment, no critical risks related to accidents and emergencies that could have significant environmental and external impacts were identified..

E10 SYSTEMATIC RISK MANAGEMENT (SS-G3)

The Group's Audit Committee coordinates the preparation of Risk Management. The four most significant - in terms of estimated quantitative impact - risks identified at Group level in the latest Risk Management review are, in order, the following:

- Changes to the Business Model
- IT Security
- Shortages of qualified staff
- Negative change in the activity of large technology providers

E11 FUTURE OBJECTIVES

Sector	Subject	Objective
Environment	Direct and indirect emissions	<ul style="list-style-type: none"> • Strengthening the vehicle fleet by 25% by increasing the use of hybrids until the end of 2024 • Reduce direct and indirect emissions by 30% by 2030
People	Human resources training hours	<ul style="list-style-type: none"> • Maintaining training hours in 2024 and increasing them by 10% by 2025
	Inclusion	<ul style="list-style-type: none"> • <i>Ongoing establishment of diversity programs within the framework of the Group's signed Diversity Charter and continuous development of an inclusive culture</i>
Governance	Evaluation of suppliers	<ul style="list-style-type: none"> • Development of supplier assessment forms and scoring on their maturity on sustainable development issues by 2025
	Personal data	<ul style="list-style-type: none"> • Continuous education on privacy issues and maintaining zero data breaches by 2025



SUSTAINABLE
DEVELOPMENT REPORT OF
EPSILON NET GROUP
2023



EPSILONNET
GROUP OF COMPANIES

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-  /OmosEpsilonNet
-  company/epsilon-net
-  epsilonNet_official
-  Epsilon Net

