



SUSTAINABILITY
REPORT 2024
EPSILONNET GROUP





SUSTAINABILITY REPORT 2024

EPSILONNET GROUP

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A. EPSILONNET GROUP SUSTAINABILITY REPORT

The Sustainability Report for the fiscal year 2024 presents the activities and characteristics of the companies of the EPSILONNET Group, covering the period from 01.01.2024 to 31.12.2024, and refers to the Group's non-financial indicators.

It is addressed to all stakeholders and has been prepared in accordance with the ESG Information Disclosure Guide (2022) published by the Athens Stock Exchange (ATHEX).



Chairman's Message - ESG Objectives (A-G3)

“ Sustainable development is now an integral part of our long-term business strategy, and the EPSILONNET Group consistently implements its policy for environmental protection, added value to society, and the adoption of sound governance principles.

The rapidly changing environment brings major challenges such as climate change, social responsibility, and proper business conduct. These conditions require us to operate with the goal of long-term value creation for the Greek economy and the society we serve.

We embed sustainability into our operations—not simply as a target but as a path we must follow to secure a better future for all. We remain committed to our social role and our ethical mission, believing that business prosperity is closely linked to societal prosperity.

The strong sense of teamwork that characterizes the Group is founded on trust, aiming at the active participation of our people in everyday processes of learning, social contribution, gender equality, governance, transparency, and accountability.

This Sustainability Report highlights our philosophy of continuous evolution and adaptation of our short- and long-term goals to meet economic, social, and environmental needs. Guided by innovation, technological excellence, and the quality of our products and services, we continue to grow with respect for people, society, and the environment.”



A1 GROUP SUSTAINABILITY – STRATEGIC GOALS

The rapid growth of the EPSILONNET Group is the outcome of strategic planning aligned with the prospects of the Greek economy and global technological developments.

Since 2013, the Group has been investing in cutting-edge technologies. In recent years, we have focused on developing cloud, web, and mobile solutions, as well as AI technologies that enable remote work, real-time access to corporate data, enhanced data security, and advanced data analytics.

Digital transformation remains an essential requirement for Greek businesses, and our commitment to this strategy has enabled us to capitalize on major opportunities and expand dynamically.

The Group maintains strong financial health, funding its investment program with equity capital.

The last five years included significant acquisitions of companies with strategic positioning in vertical markets such as hospitality, F&B, retail, pharmacies, and pharmaceutical distribution.

Our overarching goal remains to deliver integrated, all-in-one solutions that address multiple business needs.

The strategic partnership with the National Bank of Greece marks a new era in providing fintech and digital banking services through the EPSILONNET software ecosystem.

Additionally, the entry of **GENERAL ATLANTIC** into the Group's shareholder structure acts as a catalyst for further expansion in international markets, with subsidiaries already in Romania and Cyprus and partner networks in Bulgaria, Albania, and Croatia.





A2) SHORT - TERM TARGETS 2025-2026

Throughout 2024, the Group continued implementing its strategic business plan and updated its objectives:

- Establishment of a new Corporate Governance model following shareholder-structure developments and delisting from ATHEX
- Formulation of a long-term ESG strategy supporting transformation, growth, and sustainability
- Further assessment of risks and opportunities stemming from the business environment and climate change

The Group focuses on:

- ✓ Human rights
- ✓ Diversity & inclusion
- ✓ Continuous reduction of energy consumption
- ✓ Gradual reduction of carbon footprint
- ✓ Strengthening technological solutions that address environmental and social challenges

- In parallel, the Group systematically addressed — and continues to address — matters related to Human Capital Development and the attraction of new talent, while particular emphasis was placed on measures for the health, safety, and well-being of employees during the pandemic. Continuing our path and mission, we aim to foster a fair and resilient society and contribute to a prosperous economy.
- Management intends to undertake the appropriate initiatives to further strengthen the Group's level of organization and operations, initiatives that will collectively enhance its overall effectiveness and support the implementation of the business plan. The strategic objective of management remains the continuous creation of value for shareholders, partners, and employees, as the largest Group of Business Software & Technology Solutions in Greece



A3 BUSINESS MODEL (A-G1)

The EPSILONNET Group is one of the fastest-growing groups of companies in Greece, operating since 1999 in the IT sector, developing software applications, creating digital content, providing integrated online information, and offering training and education in matters related to tax and labor legislation and jurisprudence.

Today, more than **150,000 clients** (accounting firms, businesses, and self-employed professionals) trust the Group's products, while its partner network exceeds **500 collaborators** across Greece.

The business model adopted by EPSILONNET aims to achieve maximum performance through the synergy of its Business Units and subsidiaries, maintaining flexibility and competitiveness, and implementing strategic initiatives that ensure a dynamic response to the continuously evolving market—particularly in information technology and high-tech products.

Our vision is to establish the Group as a reference point in the IT sector, both nationally and internationally, by offering each business unit modern software applications that support their digital transformation, enhance their ability to leverage information for optimal growth, and provide unlimited access to scientific knowledge by utilizing the capabilities offered by advanced technology.

Our mission includes monitoring developments in the digital and technology ecosystem and creating specialized, reliable products and high-quality services that fully meet the needs of all business units.

Our Values

• Reliability & High Product Quality:

In a rapidly changing business environment, companies require technologically advanced and reliable software systems that offer innovative solutions and security.

• Customer Commitment:

We do not merely conduct transactional business—we build strong, long-term relationships of collaboration and trust.

• **Respect, Meritocracy & Equality:**

We respect our people and prioritize meritocracy, teamwork, and collaboration, offering a positive and supportive work environment.

• **Continuous Training & Scientific Rigor:**

We encourage a culture of continuous learning and support our employees in activities that enhance their skills and knowledge. Scientific documentation is a core principle in all operations of the organization.

• **Passion & a Positive Spirit:**

These values inspire creativity and innovation throughout the company's and the Group's life cycle.

• **Optimism:**

We treat each challenge as an opportunity. With optimism, we seek solutions and continuously improve.

• **Creativity:**

With positive energy, ingenuity, and passion for technology, we design and develop products and solutions for businesses of any size.

• **Value Creation:**

We create value for all stakeholders and shareholders of the Group.

Group Activities

The activities of the EPSILONNET Group are divided into two main sectors:

1. Technology Sector

Activities include:

1. Development of hybrid-technology platforms for IT solutions (Pylon, Galaxy, etc.)
2. Development of cloud, web, and mobile applications (EPSILON SMART)
3. Development and sale of enterprise software products
4. Development of innovative digital-transaction



products and services

5. Design and implementation of private IT projects
6. Development of knowledge bases and data-mining tools
7. Provision of information services through online portals such as e-forologia and TaxHeaven
8. Provision of specialized support services for enterprise software products to end users

2. Education Sector

Activities focus on:

1. Development of online and asynchronous learning solutions
2. Design of educational products and services
3. Professional training for business executives and practitioners
4. Delivery of undergraduate and postgraduate programs in collaboration with accredited academic



institutions (e.g., Northampton University, National and Kapodistrian University of Athens) and professional bodies (AIA, SOEL)

Educational services are offered through two training facilities (Athens and Thessaloniki), certified by the Ministry of Education.

EPSILONNET is also certified as a Lifelong Learning Center II and operates as a College under the name “EPSILONNET College.”

Instruction is provided by the Group, while examination oversight and final certification are carried out by the collaborating academic or professional institutions.

Our Competitive Advantages

- We offer integrated solutions that cover all business needs, regardless of size or sector (All-in-One Solution).
- Significant investment in Hybrid Technology over the last 5 years, resulting in the Pylon platform and its corresponding applications.
- Development of modern cloud, web, and mobile applications (EPSILON SMART, EPSILON ERGANI).
- Products that serve all businesses, across all industries and sizes.
- Modern information and knowledge services that integrate effectively with software solutions.
- Specialized training services enabling executives to deepen their understanding of tax and labor changes and assimilate knowledge efficiently.
- Management with experience, vision, and strategic direction.
- Strong commitment to the principles of corporate governance.

 **EPSILONNET**

A4

 **EPSILON
SINGULARLOGIC**

 **EPSILON
HR**

 **data**
communication
MEMBER OF
EPSILONNET GROUP OF COMPANIES

 **EPSILON
HOSPITALITY**

hoteliga
MEMBER OF
EPSILONNET GROUP OF COMPANIES

iQom
INTELLIGENT SYSTEMS
MEMBER OF EPSILONNET GROUP OF COMPANIES

 **TECHNOLIFE**
MEMBER OF EPSILONNET GROUP OF COMPANIES

SystemSoft
MEMBER OF EPSILONNET GROUP OF COMPANIES

 **EPSILON
SUPPORTCENTER**

TAX HEAVEN

THE COMPANIES OF THE EPSILONNET GROUP (2024)

AA
Hotel Availabilities

**EPSILON
OROSIMO**

digital4u
all about internet

HOTELONCLOUD
HOSPITALITY SOLUTIONS

**EPSILON
CSA**

pcs
MEMBER OF EPSILONNET
GROUP OF COMPANIES

DigiNET
TECHNOLOGY DISTRIBUTOR
MEMBER OF
EPSILONNET GROUP OF COMPANIES

Netera

Nanosoft

HotelAvailabilities

BookOnlineNow

SCAN
INFORMATION SYSTEMS
MEMBER OF EPSILONNET
GROUP OF COMPANIES



EPSILONNET S.A.

EPSILONNET S.A. operates in three core sectors:

Information Technology (EPSILONNET Software),

Digital Content Creation (EPSILONNET Network), and

Education & Professional Training (EPSILONNET Training).

• EPSILONNET Software Business Unit

This unit provides comprehensive software applications for businesses and accounting firms.

Its portfolio includes **19 distinct products**, organized into three major product lines:

- Payroll & HRMS applications
- Accounting office applications
- Commercial and accounting ERP applications for businesses
- EPSILONNET Network Business Unit

This unit focuses on the online creation of scientifically validated content, including legislative material on tax, labor, and financial law.

A flagship point of reference is the portal www.e-for-ologia.gr, as well as the monthly subscription-based magazine **EPSILON7**, available in both print and digital form.

• EPSILONNET Training Business Unit

Provides high-level professional training and specialization through open seminars, in-house corporate training programs, and workshops.

Additionally, it holds the **exclusive rights in Greece** to offer the **AIA (Association of International Accountants)** International Certification Titles — one of the six recognized professional bodies supervising chartered accountants in the UK, with a presence in over 85 countries worldwide.

EPSILON SINGULARLOGIC S.A.

EPSILON SINGULARLOGIC offers leading and innovative solutions for the design, development, and implementation of business applications through the **Pylon** and **Galaxy** platforms, creating added value for all types of businesses as well as key vertical markets.

The company holds a dominant position in the Greek IT market, supported by exceptionally skilled and highly trained professionals with specialized expertise in **ERP, CRM, Retail, WMS, Mobile, MIS** systems, along with a certified and robust network of **more than 500 partners** across the country.

The company emerged from the acquisition of **SingularLogic** by **EPSILONNET** and **Space Hellas**.

EPSILON HR S.A.

EPSILON HR is the market leader in Human Resource Management and Payroll systems, setting new standards in the HR information systems market—particularly following the acquisition of product portfolios from **SCAN, Data Communication, and Epsilon SingularLogic**.

It offers a unique and innovative portfolio of solutions that meet the needs of any business in the Greek market, regardless of size, consistently showcasing technological advancement and comprehensive coverage of HR and payroll requirements.

DATA COMMUNICATION S.A.

With **35 years of dynamic presence and three technological generations of products**, Data Communication is one of the largest software developers in Greece. Its history is closely linked with innovative applications that have significantly transformed the way accounting firms operate.

As a **Microsoft Gold Partner**, the company promotes and supports the full suite of **Microsoft Dynamics**



business solutions, while also developing its own proprietary solutions and specialized add-ons tailored to vertical markets.

EPSILON HOSPITALITY S.A.

EPSILON HOSPITALITY specializes in the Hospitality and Food & Beverage sectors, offering products and solutions for hotels, tourist accommodations, restaurants, and retail businesses operating within the tourism industry.

It features a comprehensive and diverse product portfolio that combines **Pylon** and **Galaxy** platforms with the solutions and products of **Sysco S.A.** and **Hoteliga International Sp. z o.o.**, delivering integrated, high-value technology for the full spectrum of hospitality operations.

iQOM S.A.

iQOM is a subsidiary of Epsilon SingularLogic and a member of the EPSILONNET Group, specializing in the provision of integrated IT solutions. It focuses on the development of standardized Retail business software and holds the **leading position** in this sector.

TECHNOLIFE Ltd.

Technolife operates in the provision of comprehensive business software solutions. It specializes in the implementation and support of **ERP software applications**, the development of custom applications, and the installation and support of network and telecommunications systems. Its solutions cover nearly the entire spectrum of professional activities across industries.

SYSTEM SOFT S.A.

A subsidiary of Epsilon SingularLogic and a member of the EPSILONNET Group, System Soft has been active since 1995 in delivering IT solutions for small and medium-sized enterprises in the private sector.

Its operations include:

- Distribution of IT systems and networks
- Promotion of software applications
- Provision of user training and application support services
- Delivery of technical support services

EPSILON SUPPORT CENTER S.A. | EPSILON SUPPORT THESSALONIKI

Provides high-level software support and development services through innovative and fully integrated IT solutions, ensuring optimal support for EPSILONNET's extensive partner network.

PROFESSIONAL COMPUTER SERVICES S.A.

Professional Computer Services S.A. has been providing comprehensive vertical solutions for the **financial and insurance sectors** for over **30 years**.

Its portfolio includes solutions for:

- Wealth Management
- Mutual Funds
- Pension Administration
- Fund Distribution
- Brokerage
- Corporate Actions

The company operates internationally in markets such as **Luxembourg, Romania, Bulgaria, Cyprus, Serbia, Turkey, Poland, Kenya, and Malta**.

EPSILON CSA S.A.

EPSILON CSA specializes in software development for the **Retail sector** and the **pharmaceutical wholesale sector**. It holds a **leading position in the pharmacy market**, as the majority of computerized pharmacies in Greece use its software solutions.



TAX HEAVEN



The company has deep technical expertise and a wide partner network across the country.

DIGITAL4U S.A.

Digital4U operates in the **Digital Marketing** sector, offering a wide range of services tailored to the individual needs of its clients and covering the full spectrum of online visibility. It has extensive experience in the creation of **e-shop/e-commerce solutions** - from development and optimization to promotion - providing end-to-end digital solutions.

EPSILON SUPPORT CENTER ATHENS S.A.

Provides high-level software support and development services with innovative and fully integrated IT solutions, ensuring optimal support for EPSILONNET's extensive partner network.

EPSILONNET CYPRUS LTD

Based in Limassol, Cyprus, EPSILONNET CYPRUS LTD promotes, supports, and resells the Group's applications in the Cypriot market.

TAXHEAVEN S.A.

TAXHEAVEN is a tax and accounting information portal offering comprehensive information products and services, education and training, online database systems, and specialized IT applications for businesses and accounting firms.

HOTEL AVAILABILITIES S.A.

Specializes in the development and provision of **Channel Manager systems** for hotels and tourist accommodations. It has created the cloud solution **Hotel Availabilities Channel Manager**, which connects with more than **65 booking channels** (Booking.com, Expedia, Hotelbeds, etc.). Additionally, it offers

intelligent features that support hotel managers in optimizing channel-specific strategies.

BOOKONLINENOW I.K.E.

BOOKONLINENOW develops **online booking engine systems** for hotels and tourist accommodations and has created one of the most advanced hotel booking engines globally. It also provides comprehensive services and innovative tools aimed at increasing direct bookings and maximizing sales performance.

HOTELONCLOUD LIMITED

HOTELONCLOUD delivers integrated technology solutions for hotels and serves as the main strategic partner of BookOnlineNow in international markets across **Europe, Africa, the Middle East, Southeast Asia, and Latin America**. Its services and solutions include **Digital Marketing services** and tools designed to increase direct hotel bookings through the hotel's website.

EPSILON EUROPE PLC

EPSILON EUROPE PLC is a subsidiary of EPSILONNET, headquartered in Cyprus, with the purpose of supporting the Group's future expansion and development activities across Europe.

OROSIMO SOFTWARE

OROSIMO specializes in:

- The implementation of complex IT projects and the installation of **ERP, CRM, and Supply Chain Management** systems in medium and large enterprises—particularly in sectors such as industry, logistics, and transportation in Greece and abroad.
- The development of specialized software solutions and systems tailored to the specific needs of its clients.

EPSILON OROSIMO ROMANIA

EPSILON OROSIMO ROMANIA is active in the



promotion of enterprise software applications, as well as the installation, configuration, and customization of such systems for businesses of any size and industry in the Romanian market.

DIGINET

DIGINET specializes in the development, distribution, and technical support of modern **tax and fiscal devices**, cash register systems, and specialized technological products and solutions (Technology Distributor).

NETERA

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

SCAN

SCAN S.A. is an important partner of the EPSILONNET Group, holding responsibility for the selection, procurement & distribution of access-control systems, time-tracking systems, and generally integrated solutions connected with payroll & HRMS systems. This specific sector is expected to show significant growth in the coming years. This fact, combined with leveraging EPSILONNET Group's leading position in payroll systems and its multiple distribution channels, is expected to significantly increase the company's revenue.

Within the fiscal year 2024, the EPSILONNET Group expanded further, adding the following companies to its structure:

The subsidiary company "**EPSILON HOSPITALITY S.A.**", on 12.1.2024, acquired a 51% stake (€153,000) in the newly established subsidiary "**HOLISTIC HOSPITALITY CONSULTING S.A.**", which operates

in providing business consulting services for the management and operation of hotels and tourist accommodations, offering continuous support and expertise to hotel businesses and/or hotel-management companies with the aim of shaping innovative sales-management strategies, providing consulting on systems and software, wholesale trade of computers, peripheral computer equipment and software, and the provision of IT services.

The company was consolidated for the first time in the consolidated financial statements of **30.6.2024**.

In August 2024, the subsidiary company "**HOLISTIC HOSPITALITY CONSULTING S.A.**" acquired a 60% stake in "HOSPITALITY BUSINESS INTELLIGENCE SOLUTIONS S.A.", which operates in the field of IT application services and specifically in providing consulting for business-intelligence systems and software to hotel units, F&B units and other tourism enterprises, as well as in the development, sale, customization and integration of software systems, and in providing business-consulting services related to business development, financial matters, costing and sales. The company was consolidated for the first time in the consolidated financial statements of **31.12.2024**.

In October 2024, EPSILONNET completed the acquisition of a 60% stake in "**NANOSOFT S.A.**", which operates in the production, commercialization, and support of software applications for businesses active in the hospitality and tourism sector, and which was consolidated for the first time in the consolidated financial statements of **31.12.2024**.

In November 2024, EPSILONNET completed the acquisition of a 60% stake in "INTELISOFTCY LTD", which develops, markets and supports software applications for businesses providing accounting, auditing and legal services, based in Cyprus, and which was consolidated for the first time in the consolidated financial statements of 31.12.2024.

A5 SIGNIFICANT DISTINCTIONS 2024



The Group's awards constitute a testament to its growth trajectory, technological excellence, and human-centric culture. They highlight the corporate vision, the commitment to daily effort, and the substantial contribution to the fields of information technology, new technologies, and business, confirming its continuous upward course and dedication to the "people" factor.

During 2024, the EPSILONNET Group received the following awards:

- It received a total of **7 distinctions** at the **Accounting Awards 2024**, including the top honor **"IT & New Technology Consultant of the Year."**
- It excelled, in collaboration with **National Bank of Greece**, securing **3 top distinctions** at the **Digital Finance Awards 2024**.
- It achieved **1st place** in **Best Workplaces for Women Hellas 2024**.
- The EPSILONNET Group and its subsidiary **Epsilon SingularLogic** distinguished themselves at the **Mobile & IoT Excellence Awards 2024** with 2 significant awards.

• **Epsilon Hospitality**, the Group's specialized hospitality subsidiary, stood out at the **Tourism Awards 2024**, receiving **4 major distinctions**.

• It was recognized for the **10th consecutive year** in **Best Workplaces Hellas**, ranking **7th** among large enterprises.

• It excelled at the **CLOUD Computing Awards 2024**, earning **21 awards**, including the top distinction **"CLOUD Provider of the Year 2024."**

• **Epsilon Training**, a member of the EPSILONNET Group, was awarded for the **9th consecutive year**, earning **two distinctions**.

• It received a total of **13 awards** at the **BITE Awards 2024**, including the top distinction **"Software Company of the Year"** for the 4th consecutive year.

• It was included in the **Fortune lists**:

"100 Best Companies To Work For in Europe 2024" & **"Best Workplaces in Technology 2024."**

• **Epsilon Hospitality** emerged as one of the leading winners at the **Greek Hospitality Awards 2024**, securing **four Gold awards**.

A6) CORPORATE RESPONSIBILITY IN THE EPSILONNET GROUP

The EPSILONNET Group, through the values it consistently represents, grows and creates value, harmoniously combining actions for society, employees, and the environment, with responsibility and sensitivity toward people.



B. SUSTAINABLE DEVELOPMENT





INTRODUCTION

Sustainable development is a global priority that mobilizes governments, civil society, and businesses toward adopting new practices. With the establishment of the United Nations Sustainable Development Goals (SDGs), a new understanding has emerged regarding the role of companies. Increasingly, businesses are measuring, disclosing, and managing the risks and opportunities related to sustainable development.

Environmental, social, and governance factors—known as ESG Factors—are rapidly being integrated into business operations as well as into the regulatory frameworks of capital markets. The term “ESG” refers to environmental, social, and corporate governance issues that can affect a company’s ability to generate long-term value.

The EPSILONNET Group participates in the new initiatives being developed, aiming to demonstrate the ability of its companies to create value and formulate effective, long-term strategies. We monitor, participate in, and jointly shape the emerging challenges at EU level through the new directives that lead to revisions of ESG criteria, as well as the new requirements concerning audits and certifications.

We create long-term and sustainable value for all our Stakeholders, contributing to the Global Sustainable Development Goals and the corresponding national priorities. This 2024 sustainability report is another effort to present the defining characteristics of our Group—elements that have been present in previous years and are now systematically incorporated into a non-financial reporting framework.

B1 SUSTAINABILITY REPORT – ESG TARGETS (AG3)

The 2024 sustainability report of the EPSILONNET Group gains greater weight and substance when considering the events that unfolded globally. The energy crisis, high inflation, extensive and ongoing environmental disasters, and the steadily rising social inequalities posed significant challenges, yet they further strengthened our efforts in implementing and setting targets for ESG practices.

The volatility of the economic and social environment creates a new reality to which we must respond, with our people and our contribution to environmental protection as our top priorities. Our objectives are set within the framework of a long-term effort to achieve better performance year after year, encouraging our people toward responsible consumption, guided by the collective good.



B2 MATERIAL TOPICS 2025-2026-2027

E

1. Innovation with an emphasis on digital transformation and a neutral carbon footprint.
2. Strengthening initiatives to increase the share of renewable energy sources in the energy mix.
3. Further expansion of the vehicle fleet with hybrid and electric cars.

S

1. A working environment that promotes health and safety.
2. Continuous training and development of our people.
3. A workplace free from discrimination and exclusion.
4. Positive impact on society, the economy, and the environment in the regions where we operate.
5. Contribution to the circular economy through efficient management, recycling, and resource recovery.
6. A reliable and sustainable supply chain.

G

1. Good governance, transparency, and business ethics.
2. Strengthening the structures and policies ensuring protection from inappropriate behavior, harassment, complaints, etc.
3. Increasing women's participation in management positions and further reducing pay gaps.
4. Enhancing communication with shareholders and both institutional and private investors.

B3 THE GROUP AT A GLANCE (KEY FIGURES 2024)

Summary

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

Human Resources

- Employees: 1,665
- Women: > 42%
- Men: > 58%
- 80% under the age of 50
- 23,957 training hours
- 15.0 average training hours per employee
(14.5 for the top 10% highest earners & 15.8 for the bottom 90% of earners)
- €221.3 average training cost per employee

Financial Figures

2024	
Revenue	
€116,82m	+25%
EBITDA	
€32,09m	+10%
ADJUSTED EBITDA	
€32,48m	+4%
EAT	
€20,66m	+3%
ADJUSTED EAT	
€21,05m	-4%

Taxes and contributions

- €51.5m

Our Economic Activities According to the Taxonomy

In the context of the provisions of the European Taxonomy System (EU Taxonomy), the Group, by aligning its economic activities with those included in the regulation on the European taxonomy system (<https://ec.europa.eu/sustainablefinancetaxonomy/>), has identified as Taxonomy-eligible the activity referred to as “**62.01 Computer programming activities**” within the economic activity sector *Information and Communication*, as well as the activity referred to as “**85.5 – Other education**” within the economic activity sector Education.

In these specific categories the activities related to the objectives of climate change mitigation and adaptation include the Group’s activities associated with:



1. **the design of the structure and content and/or the writing of computer code** required to create and implement:

- systems software (including updates and patches)
- application software (including updates and patches)
- databases
- websites

2. **software adaptation**, meaning the modification and configuration of an existing application so that

it can function within the customer's information system environment

3. **general continuing education and continuing vocational training** for any profession or for purposes of self-development.

The table below presents the percentage of the Group's revenue, capital expenditures, and operating expenditures related to the Taxonomy-eligible economic activities, in accordance with the requirements of Article 8 of the Taxonomy Regulation and Article 10(2) of the Article 8 Delegated Act:

	TURNOVER	%	CAPITAL EXPENDITURE (CAPEX)	%	OPERATING EXPENDITURE (OPEX)	%
ELIGIBLE 62.01	114.978.842,29€	98,43%	17.401.448,36€	100%	89.582.697,35€	98,74%
ELIGIBLE 85.5	1.839.767,08€	1,57%	€	0%	1.122.542,34€	1,24%
NON-ELIGIBLE	€	0%	€	0%	19.563,00€	0,02%
TOTAL	116.818.609,37€	100%	17.401.448,36€	100%	90.724.802,69€	100%

B4 SUSTAINABILITY POLICY (CG4)

Sustainable development refers to a form of development policy that aims to meet the economic, social, and environmental needs of society in a way that ensures short-, medium-, and most importantly, long-term prosperity.

It is based on the premise that development must respond to current needs without jeopardizing the well-being of future generations. In practice, this means creating the conditions for long-term economic

growth while simultaneously ensuring the protection of the environment.

The purpose of establishing policies within the framework of sustainable development is to create value which, through the achievement of business excellence, responds to the company's social and environmental commitments and responsibilities.

The Sustainable Development approach applies to the EPSILONNET Group, its people (Management –

Employees), and its broader stakeholders. It is disseminated and adopted across the Group's companies, enhancing their competitiveness and aiming at creating value for the benefit of stakeholders.

Under the existing Sustainability Policy, we commit:

- to the continuous growth of the Company and the Group's companies, the evolution of the business model, and the creation of economic value for shareholders and stakeholders
- to the adoption of mechanisms for interaction and understanding of stakeholder expectations, and to monitoring the effectiveness of these mechanisms
- to responding to the expectations of stakeholders (employees, suppliers, customers, shareholders, social institutions, the business community, institutional and financial bodies, etc.)
- to adherence to the Group's principles and values
- to ensuring business ethics and regulatory compliance
- to monitoring the implementation of internal regulations, policies, procedures, and sustainability

guidelines at all operational levels of the Company and the Group's companies

- with regard to the environment, to providing optimum services with environmental protection as a guiding principle
- with regard to human resources, to trusting the abilities of our people and developing their skills while creating equal opportunities and respecting diversity
- with regard to society, to supporting local communities through initiatives that address local issues, concerns, and expectations
- with regard to the market, to maintaining a commitment to the continuous improvement of the products and services offered
- with regard to customers, to building strong cooperative and trustworthy relationships rather than merely transactional interactions
- with regard to products, to offering 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 the broader groups of its Stakeholders. It is implemented through three core principles, which are intrinsically interconnected and relate to the Environment, Society, and sound Corporate Governance and Operations.

Sustainable Development is the driving force through which the Company aspires to remain competitive over time, address modern challenges, and—by developing appropriate collaborations—contribute to a new, efficient development model without social exclusion, as outlined in the international context through the Global Sustainable Development Goals.

B6) IMPLEMENTATION OF SUSTAINABLE DEVELOPMENT STRATEGIES

- **Principle of Materiality:**

We identify and discuss the material issues that reflect our significant economic, environmental, and social impacts and influence the decisions of our Stakeholders.

- **Principle of Stakeholder Inclusiveness:**

Through open and structured dialogue, we seek to build strong, trust-based and collaborative relationships with our Stakeholders, with the aim of jointly contributing to Sustainable Development.

- **Principle of Accountability:**

We fulfill our commitment to transparency and the regular updating of all our Stakeholders by annually publishing the Sustainability Report, which presents our Non-Financial performance.

B7) SUSTAINABILITY OVERSIGHT (C-G2)

EPSILONNET retains responsibility for monitoring the proper implementation of the Sustainability Policy through its designated executives, with the support and participation of the audit mechanisms available to the Company and according to the methodology it has established. The overall oversight of EPSILONNET's sustainability framework is carried out by the Company's Board of Directors.

C. ENVIRONMENT





Climate change is a reality that generates successive and multifaceted crises which we are called upon to confront as a global society. As a Group, with strong environmental and social awareness, we assume our share of responsibility, striving to contribute to solutions that address these critical challenges, with sustainable consumption as our primary goal.

C1 ✓ DIRECT EMISSIONS (C-E1), INDIRECT EMISSIONS (CE2), ENERGY CONSUMPTION AND PRODUCTION (C-E3)

As part of addressing climate change, the Company has established good practices that are adopted by all employees across the Group. Initially, and with regard to heating management, we operate as follows:

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

- During the winter period: constant temperature of 22°C
- During the summer period: constant temperature of 24°C

This practice is based on the fact that for every degree increase in heating or cooling, energy consumption rises by approximately 5–10%.

It should be noted that the remaining buildings of the subsidiaries do not have central cooling–heating systems but operate with autonomous split units.

2. All computers and screens must be turned off

when employees leave (with the exception of units that must remain in continuous operation), as devices continue to consume energy even when switched off but left in standby mode.

3. The facilities department in the Group's buildings ensures that lights are turned off when staff leave the premises, and during the day it also checks spaces that employees or visitors have exited.

4. We also aim to implement two additional actions that can contribute effectively:

a. Establishing a regular maintenance schedule for autonomous air-conditioning units as well as central heating/cooling systems, as proper operation reduces energy consumption.

b. Replacing light bulbs with energy-efficient ones, which consume up to five times less energy compared to conventional bulbs, while also ensuring longer lifespan and energy savings.



c. Total fossil-fuel emissions from corporate vehicles and the Company's facilities in 2024 amounted to **40.554 tons CO₂eq**, compared to **32.231 tons** in 2023, while CO₂e emissions from electricity consumption reached **127.365 tons CO₂eq** in 2024, compared to **173.019 tons** in 2023.

One of our goals is the gradual replacement of part of the conventional vehicle fleet with hybrid vehicles, transforming our fleet into a more environmentally friendly one.

Recognizing the needs arising from climate change—and through specific guidance and encouragement to the Group's human resources—we strive to reduce energy consumption. In this direction, the upcoming relocation of the Company to a new, modern building further contributes to this effort.

As is known, our new offices are located in an existing building that has undergone a complete renovation, incorporating all modern specifications that influence both workplace operations and environmental responsibility.

Our new building, to which we are gradually relocating from August 2025, is considered one of the stand-out projects in the city of Thessaloniki, incorporating contemporary mechanical and architectural design. The goal of the architectural design was to upgrade the aesthetics and functionality of the building spaces, improve the working environment, integrate new technologies, and reduce energy consumption.

We aimed to create a green building of high standards. Indicatively, the design includes:

- Creation of indoor and outdoor bicycle parking spaces and changing rooms
- Landscaping of the surrounding area to improve the microclimate
- No-smoking signage
- Energy-efficient window frames and glazing
- Design of a central area for collecting recyclable materials and provision of recycling infrastructure on every floor
- Use of materials with a low energy footprint
- Use of paints and coatings with low volatile organic compound emissions, as well as adhesives, sealants, flooring, false ceilings, walls, and thermal and acoustic insulation materials with the same properties
- Infrastructure for electric-vehicle chargers in parking areas
- Use of plumbing fixtures with very low water consumption
- Office lighting and air-conditioning control system with presence sensors
- Parking area lighting control system with sensors
- Use of lighting fixtures with very low energy consumption
- Energy consumption meters for climate control, lighting, and sockets

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

According to the nature of their activities, the EPSILONNET Group companies do not fall into categories that cause significant environmental burden or generate large volumes of waste or wastewater.

However, recognizing the importance of environmental protection, the Group has undertaken specific actions to improve its environmental performance, even through its partners.

In this context, we have entered into a frame agreement for e-recycling (device recycling program) with

a hardware provider. Through this partnership, we contribute to reducing and better managing e-waste, which globally amounts to tens of millions of tons annually, of which less than 20% is recycled.

The minimal wastewater generated is managed according to green-management principles, including toner recycling and recycling of all lead-acid batteries through authorized companies. In addition, in terms of fleet maintenance, the partnering leasing companies recycle old vehicle batteries when replaced.



C3) WATER CONSUMPTION (SS-E3)

The total volume of water consumed at EPSILONNET facilities in 2024 amounted to **2,008.62 cubic meters**, according to invoices from the respective water and sewerage companies, compared to **1,390.55 cubic meters** in 2023.

As an active participant in addressing the challenges of climate change, the Group's Human Resources Department raises awareness among all employees and strives to cultivate a mindset of sustainable and careful consumption.

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

All of the above lead us to understand that climate change, beyond its risks, also creates several opportunities. For this reason, we implement a series of actions aimed at addressing the risks arising from climate change. Within the Group, initiatives are carried out with the goal of upgrading and improving the building stock and technological infrastructure. Some of these actions include:

- i) Installation of a system for measuring consumed electrical energy
- ii) Replacement of light bulbs with new LED technology
- iii) Installation of an automatic lighting control system in common areas



D. SOCIETY





D1 ✓ OUR PEOPLE ARE OUR STRENGTH

National and European distinctions for the work environment, as well as the awards for Best Workplace in the Technology Sector, demonstrate the long-term and continuous effort to build a work culture that respects everyday life while also providing a fertile ground for employees to achieve their goals.

By offering the tools, training, support, safety, and guidance, the daily objective is for everyone—as one team—to be able to achieve high goals and continuous development, driven by a shared passion and vision.

The companies of the EPSILONNET Group comply with all measures and obligations related to the implementation of the provisions of Part II of Law 4808/2021 for the prevention and handling of all forms of violence and harassment, including gender-based violence and harassment, as well as sexual harassment. For this reason, in early 2023 the Group drafted a Policy for combating discrimination, violence, and harassment in the workplace, which, among other provisions, includes a procedure for submitting and examining complaints.

Through this Policy, the Company commits to maintaining a work environment in which all individuals are treated with respect and dignity. Every person has the right to work in a professional atmosphere that promotes equal employment

opportunities and prohibits unlawful discriminatory practices, including violence and harassment. Accordingly, the Company expects that all relationships among individuals at its facilities will be characterized by professionalism and free from discrimination, prejudice, violence, and harassment.

The Company has developed this Policy to ensure that all 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 know that any complaint relating to a violation of the Policy will be investigated and resolved appropriately. It is explicitly and categorically stated that any form of discrimination, violence, and harassment occurring during work, connected to work, or arising from work, is strictly prohibited.

Supporting the above and respecting individuality while adhering to an equal-opportunities policy, the EPSILONNET Group signed the Diversity Charter, which aims to serve as a commitment mechanism for preventing discrimination in the business environment and for promoting equality, equal opportunities, and diversity in every workplace in Greece. The fundamental pillars constituting Diversity are: gender, age, race and color, disability and chronic illness, national and ethnic origin, and sexual orientation.

The EPSILONNET Group is an equal opportunity employer and is committed to making every possible effort to uphold the value of respecting diversity within its workforce. It is the Group's policy to ensure equal employment opportunities without discrimination based on race, color, religion, creed, age, gender, sexual orientation, national origin,



citizenship, disability, personal status, trade union activity, pregnancy (including unlawful discrimination based on legally protected pregnancy/maternity leave), veteran status, or any other characteristic protected by law.

D2) WOMEN EMPLOYEES (C-S2), WOMEN EMPLOYEES IN MANAGEMENT POSITIONS (C-S3), EMPLOYEE MOBILITY (C-S4), GENDER PAY GAP (A-S3), RATIO OF CEO COMPENSATION TO EMPLOYEE COMPENSATION (A-S4), VARIABLE COMPENSATION (A-G4)

The EPSILONNET Group, in line with its policies, provides equal opportunities to all—employees and candidates alike. No form of discrimination exists at any level, including matters of diversity or unequal treatment in employment, age, gender, sexual orientation, religion, etc. The principle of respect is fully upheld, the professional development of women is encouraged, and equal opportunities are provided in matters of remuneration and career advancement.

Our human-centered approach is demonstrated in practice, as in 2022 we signed the Diversity Charter. Across the entire market, the Charter can serve as a commitment tool for preventing discrimination and ensuring the implementation of equality, equal opportunities, and diversity.

Employees per company for the year 2024 were distributed as follows:

HUMAN RESOURCES 2024	MEN	WOMEN	ΣΥΝΟΛΟ	MEN %	WOMEN %
EPSILONNET A.E.	315	337	652	48%	52%
EPSILON HOSPITALITY A.E.	30	17	47	64%	36%
EPSILON SUPPORT CENTER A.E.	11	9	20	55%	45%
EPSILON SINGULARLOGIC A.E.	371	208	579	64%	36%
TECHNOLIFE Ε.Π.Ε.	12	11	23	52%	48%
SYSTEM SOFT A.E.	12	11	23	52%	48%
IQOM A.E.	21	12	33	64%	36%
PROFESSIONAL COMPUTER					
SERVICES ΑΝΩΝΥΜΗ ΕΤΑΙΡΕΙΑ	17	17	34	50%	50%
DIGITAL 4U A.E.	28	23	51	55%	45%
EPSILON SUPPORT CENTER					
ATHENS A.E.	7	4	11	64%	36%
KINITRON Ε.Π.Ε.	1	2	3	33%	67%
BOOK ONLINE NOW	5	3	8	63%	37%
HOTELIGA	0	5	5	0%	100%
HOTEL AVAILABILITIES	7	3	10	70%	30%
FBC	0	1	1	0%	100%
SCAN	21	9	30	70%	30%
OROSIMO	19	6	25	76%	24%
DIGINET	13	11	24	54%	46%
NETERA	3	1	4	75%	25%
HIGH TECHNOLOGY	2	3	5	40%	60%
HOLISTIC	1	0	1	100%	0%
NANOSOFT	6	1	7	86%	14%
ΔΚΓ ΙΚΕ	1	1	2	50%	50%
INVOICEHUB A.E.	1	0	1	100%	0%
ΑΠΥ	62	4	66	98%	2%
ΟΜΙΛΟΣ	966	699	1665	58%	42%
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 the fiscal year 2024, the following numerical data were recorded and categorized as follows:

By type of contract & by region for 2024:

HUMAN RESOURCES	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
ATHENS	568	356	924			
Permanent contracts	562	351	913	99%	99%	99%
Fixed-term contracts	6	5	11	1%	1%	1%
THESSALONIKI	318	279	597			
Permanent contracts	306	267	573	96%	96%	96%
Fixed-term contracts	12	12	24	4%	4%	4%
REGIONAL AREAS	80	64	144			
Permanent contracts	77	59	136	96%	92%	94%
Fixed-term contracts	3	5	8	4%	8%	6%
GROUP TOTAL	966	699	1665			
Permanent contracts	945	677	1622	98%	97%	97%
Fixed-term contracts	21	22	43	2%	3%	3%

By education level for 2024:

EDUCATION LEVEL	MEN	WOMEN	TOTAL	MEN	WOMEN
Basic	1	2	3	33%	67%
Secondary	123	131	254	48%	52%
Higher & Tertiary	629	411	1040	60%	40%
Postgraduate	209	154	363	58%	42%
Doctoral	4	1	5	80%	20%
Group Total	966	699	1665	58%	42%

By age group for 2024:

AGE GROUP	MEN %	WOMEN %	TOTAL
<30	11,31%	10,28%	21,59%
30-50	31,28%	26,81%	59,09%
50+	13,09%	6,23%	19,32%
TOTAL	55,68%	44,32%	100,00%

Additionally, new hires by region for 2024 are recorded as follows:

NEW HIRES	MEN	WOMEN	TOTAL	MEN	WOMEN
ATHENS	94	54	148	64%	36%
THESSALONIKI	57	60	117	49%	51%
REGIONAL AREAS	15	21	36	42%	58%
GROUP TOTAL	166	135	301	55%	45%

Additionally, the EPSILONNET Group simultaneously encourages the professional development of women, providing equal opportunities in matters of compensation and promotion. Women employed in managerial positions represent a significant proportion of the Group in 2024, and this is not a symbolic gesture in the context of inclusion, but a reality that has developed through equal-opportunity policies adopted by EPSILONNET for many years.

This year’s percentage representation of women employed in managerial positions is as follows:

GROUP	WOMEN	Managerial Positions
2024	42%	44%
2023	43%	46%
2022	46%	44%
2021	47%	25%
2020	45%	21%

The pay gap between the average base salary of women and men for the fiscal year 2023 is shown in the table below:

YEAR	GENDER PAY GAP	MEN	WOMEN
2024	26%	39.591	29.203
2023	20%	32.654	26.212
2022	26%	31.229	22.967

Regarding employee departures in 2024, the picture

across all companies of the EPSILONNET Group is recorded as follows, both in aggregate and broken down by reason for departure:

YEAR	VOLUNTARY	INVOLUNTARY
2022	7%	2%
2023	7,8%	1,1%
2024	6,42	1,26%

The ratio in the following table refers to the numerical ratio between the CEO’s annual total compensation and the median total compensation of the employees of a company:

CEO PAY RATIO		
12:1		
CEO	OTHERS	RATIO: 12
360.000	29.947	

Variable compensation for the year 2024 was zero.

D3

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

In the dynamic environment of new technologies, information systems, and the digital transformation of organizations in which we operate, we ensure the continuous training and education of our people, giving them the opportunity to develop skills related to their field of employment.

In 2024, an amount of €286,250 was invested for 23,957 training hours.

This investment is substantial, as it aligns with our belief that lifelong learning and the continuous upskilling of our people form a fundamental component in addressing the increasing number of modern challenges.

D4) HUMAN RIGHTS POLICY (C-S6)

The EPSILONNET Group supports and upholds fundamental human rights, both within and beyond the Group, demonstrating its commitment through the implementation of responsible workplace practices.

The Group's activities are conducted ethically and in full compliance with legal and regulatory requirements. With respect for human rights, employees and external partners are treated in accordance with the core principles of this Human Rights Statement, whose purpose is to prevent any improper conduct related to human rights.



D5) HUMAN RIGHTS STATEMENT

The **EPSILONNET Group is fully committed to its responsibility to respect human rights.** Maintaining the highest ethical standards across all areas of our operations is an integral part of our values and ethical principles, as described in our Code of Business Conduct.

Our internal documents—including the Code of Business Conduct, policies, and procedures we develop—reflect the Group's commitment to respecting human rights. This commitment is governed by the fundamental principles of our culture and aligns

with a broad range of international standards that we endorse, such as the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We strongly support these conventions across our work environment and in all Group companies.

As a Group, we believe in the intrinsic dignity of every individual and in the right of each person to live and

work safely, without fear of oppression or coercion. Our regulations—together with the Code of Business Conduct and the Human Resources Policy—underscore responsibility, integrity, and values-based decision-making, and define the standards guiding our business practices ethically and consistently.

These principles shape our interactions with colleagues, customers, stakeholders, suppliers, society, communities, and shareholders. As we evaluate our obligations as a Group with an expanded presence and client base, we have integrated into the Code of Business Conduct corporate policies and procedures that ensure these principles translate into action:

- **Equal employment opportunities & anti-discrimination:**

The Group is committed to fostering a work environment that promotes personal and professional growth and enables employees to fully utilize their potential—regardless of age, ethnicity, disability, national origin, heritage, race, religion, gender, sexual orientation, gender identity/expression, genetic information, or any other protected status. Discrimination on any of these grounds is not permitted.

- **Prevention of harassment:**

The Group condemns any form of workplace, sexual, online, or other type of harassment against employees by any individual, including employees, contractors, interns, suppliers, customers, delivery personnel, or visitors.

- **Diversity and inclusion:**

The Group is committed to maintaining a work environment that values diversity, equality, and inclusion. Employees are expected to treat one another—as well as customers, suppliers, and other partners—with respect, irrespective of professional, work-related, or interpersonal differences.

- **Data protection:**

As outlined in the Code of Business Conduct and relevant privacy policies, the Group respects individuals' privacy rights in accordance with applicable legislation and uses personal data strictly for legitimate business and employment purposes.



- **Protection against retaliation:**

Protection is provided to whistleblowers, and any form of retaliation against employees or individuals who raise concerns, seek guidance, or participate in investigations is strictly prohibited. Employees engaging in retaliation are subject to disciplinary action.

- **Labour standards:**

The Group is committed to maintaining a fair, supportive, and inclusive workplace, complying with all applicable labour standards in every jurisdiction in



which we operate. Forced labour, human trafficking, and related activities are strictly prohibited.

- **Health and safety:**

Individuals working in or visiting our facilities must maintain safe and healthy working conditions and follow all published procedures and operational guidelines. The Group also maintains programs to ensure the protection of employees who travel for business and implements enhanced measures to prevent and address epidemic or pandemic risks.

- **Remote work:**

All of the above principles apply equally in times of crisis or under new working conditions - such as remote work. The Group ensures that all relevant principles continue to be upheld and provides the tools necessary for employees to perform their duties effectively.

- **Community contribution:**

We recognize our impact on the communities in which we operate and commit to meaningful engagement with stakeholders to understand and consider their needs when conducting business. Where necessary, we contribute and participate in dialogue on human rights matters relevant to our operations.

1. Scope and Implementation

The Group consistently evaluates how its business activities may impact human rights and refrains from engaging in activities or relationships where there are clear indications of human rights violations.

Our governance, prevention, and mitigation measures focus particularly on:

- Respect for human rights of employees and society
- Prevention of human rights violations through our business relationships with customers, suppliers, and partners

To ensure effective implementation, we commit to providing mandatory annual training on the Human Rights Statement to all employees.

1.1. Employees

The Group aims to be an “employer of choice” for current and future employees (Best Workplaces). Human rights in this context include the prohibition of forced and child labour, commitment to fair compensation and working hours, freedom of association, equality, respect, and personal autonomy.

Our approach follows the ILO Declaration on Fundamental Principles and Rights at Work as well as applicable labour laws across all jurisdictions where we operate. The Group is committed to the following standards:

1.1.1. Health and well-being

We proactively address psychosocial risks and factors that lead to low productivity, absenteeism, and presenteeism through modern employee-support programs (Employee Assistance Programs). We maintain a comprehensive system for workplace health and safety, ensuring continuous protection and prevention.

By raising awareness on health and safety and providing access to medical care, the Group helps reduce workplace accidents and work-related illnesses.

1.1.2. Protection of personal data

In accordance with applicable legislation, employee personal data is classified as sensitive and requires particular protection during handling, processing (including storage and deletion), transfer, disclosure, and sharing.

All individuals processing employee data must know, comply with, and apply internal and external data-protection regulations.

Data handling complies with relevant laws on data protection and free movement of personal data, national regulations, and all applicable provisions.

1.1.3. Diversity and inclusion

The Group is committed to equal employment and promotion opportunities for all employees, respecting the rights of minorities and women without discrimination. All employees are evaluated based on performance using behaviour- and goal-based indicators and receive fair, constructive feedback.

In line with the Code of Business Conduct, we commit to treating everyone with dignity and respect, regardless of position or working conditions.

1.1.4. Compensation

Total compensation includes fixed monthly salaries, benefits, and performance-based variable pay linked to profitability and business goals at individual and organizational level.

The Group provides a fair and comprehensive compensation framework ensuring a dignified standard of living and competitive remuneration in alignment

with industry and local market standards, while supporting efforts to attract and retain talent.

1.1.5. Freedom of association

The Group complies with all relevant laws, rules, and regulations regarding collective bargaining, negotiations, and freedom of association, including ILO Conventions 87 and 98.

1.1.6. Forced and child labour

The Group maintains zero tolerance for child labour or forced labour across all business activities inside and outside the country.

1.2. Customers

To identify, prevent, and mitigate adverse human-rights impacts, we incorporate human-rights considerations—such as labour practices, forced labour, child rights, and health and safety—into our environmental and social due-diligence processes.

Customers operate across all sectors of the economy, including high-risk sectors. We assess associated risks in the same way we assess financial or operational risks, using internal assessments, external tools, and expert consultation where needed.

1.3. Suppliers

A supplier is any external entity providing goods or services to the Group.

We strive to collaborate with suppliers whose human-rights policies align with our own. Suppliers are expected to respect the rights of their employees, offer equal employment opportunities, and prohibit discrimination or harassment.

We expect suppliers and their supply chains to comply with all applicable laws—particularly labour laws—such as avoiding forced or child labour, ensuring safe working conditions, and offering fair compensation and insurance.

We maintain long-term supplier relationships whenever possible. If a supplier fails to comply with laws or Group requirements, we request corrective actions and reserve the right to terminate the relationship if issues are not resolved.

1.4. Grievance Mechanisms and Reporting

The Group seeks meaningful consultation with stakeholders as part of its human-rights due-diligence process and encourages all stakeholders to contact the organization if they have substantiated evidence of non-compliance with these procedures, enabling us to prevent or address human-rights violations.

Customers and members of the public may submit concerns or complaints via info@epsilon.net.gr, where they will be reviewed by the appropriate departments.

Any complaints—including those related to human rights—are handled according to the established complaint-handling procedure.



D6

COLLECTIVE
LABOR
AGREEMENTS (C-S7)

In the EPSILONNET Group, during the year 2023, **98% of employees were covered by individual employment contracts** that exceeded the minimum terms set by the National General Collective Labor Agreement (E.G.S.S.E.).

Furthermore, no complaint or report related to any issue of forced labor has been recorded in the Group’s employee grievance-management systems.

For 2024, the coverage is as follows:

Collective Labor Agreement Coverage	YES	NO
2024	99%	1%

D7

STAKEHOLDER
ENGAGEMENT (C-S1)

We maintain systematic dialogue and close cooperation with our Stakeholders, identified based on the impact of our business activities. We have conducted detailed mapping of all Stakeholder groups and documented the nature of our relationship with each of them.

Stakeholders include both internal audiences (shareholders, employees, commercial network) and external audiences, operating in the Greek and international environment (regulatory authorities, media, local government, suppliers, partners, customers, central government, academic community, NGOs).

Below is an overview of the key Stakeholder groups, the channels of two-way communication, and the main topics addressed through ongoing dialogue.

Stakeholders	Two-Way Communication	Priorities / Topics of Dialogue
Shareholders	<ul style="list-style-type: none">• Participation in investment forums• Scheduled Shareholder Meetings• Targeted communication sessions	Economic performance, governance, investment planning, strategic decisions, socio-economic developments

Highlight:

A series of one-on-one meetings were held with numerous investors—both remotely (via Zoom, Teams, Webex) and in person at our facilities in Thessaloniki and Athens—ensuring direct and transparent communication with shareholders and prospective investors.

Stakeholders	Two-Way Communication	Priorities / Topics of Dialogue
NGOs / Civil-Society Organizations / Business Associations	<ul style="list-style-type: none"> • Collaborations • Support initiatives • Meetings and consultations 	Education & volunteering, health & safety, environmental matters, social contribution

Highlight:

Following extensive discussions with stakeholders, the Group implemented several volunteer-driven initiatives including blood-donation drives, tree-planting activities, and more.

Stakeholders	Two-Way Communication	Priorities / Topics of Dialogue
Employees	<ul style="list-style-type: none"> • Employee Opinion Surveys • Internal communication channels / ESS • Company events • Benefits & Training programs 	Training, health & safety, equal opportunities for professional development

Highlights:

A comprehensive evaluation questionnaire was distributed to all Group employees to capture their views on a wide range of workplace topics.

Stakeholders	Two-Way Communication	Priorities / Topics of Dialogue
Academic Community	<ul style="list-style-type: none"> • Support of scientific programs • Educational programs in cooperation with Greek and international institutions • Provision of software licenses to educational institutions 	Education, innovation, IT, accounting & payroll applications, CRM applications

Highlight:

As part of our social contribution, we provide free software licenses to higher-education institutions, public and private vocational institutes, and technical high schools across the country.

Additional Stakeholder Groups

Stakeholders	Two-Way Communication	Priorities / Topics of Dialogue
Central Government / Local Authorities	<ul style="list-style-type: none">• Meetings• Participation in conferences and workshops	Cybersecurity, economic development, environment, technology and infrastructure investments, support of local communities and cultural/educational institutions
Customers (Individuals & Businesses)	<ul style="list-style-type: none">• Customer-satisfaction surveys• Customer Service Center• Online communication• Telephone hotline for complaints	Technical matters regarding products and services, service quality, telecommunications charges
Media	<ul style="list-style-type: none">• Press conferences• Meetings• Press releases and presentations	Governance, financial & commercial results, regulatory issues, service quality, infrastructure, technology & innovation, social contribution, environmental performance
Suppliers	<ul style="list-style-type: none">• On-site visits• Continuous updates & support	Procedural matters, financial terms, timely delivery, safe working conditions
Regulatory Authorities	<ul style="list-style-type: none">• Participation in consultations• Participation in surveys• Participation in conferences	Network infrastructure & investments, regulatory obligations, service quality & customer service, market competition, business-continuity issues
Commercial Partner Network	<ul style="list-style-type: none">• Communication platforms• Commercial conferences• Meetings with Sales Managers• Continuous access to information and support	Corporate governance, knowledge transfer & best practices, initiatives supporting local-community needs, training on new products & services, customer service, recycling, sustainability goals & ecological awareness

D8

SUPPLIER EVALUATION

(C-S8)

The management of EPSILONNET’s suppliers has been strengthened through continuous feedback regarding the performance of each supplier, collected from every department that has requested the respective collaboration. This feedback is ongoing and forms part of the continuous evaluation process of all suppliers.

The Procurement Department follows a specific evaluation policy, which assesses the quality of the services provided as well as the financial proposals.

Supplier evaluation is an integral part of the Group’s effort to continuously improve its products and services.

Before new suppliers are included in the approved supplier list, they are assessed based on qualitative and strategic criteria. The review of these collaborations is carried out at regular intervals to confirm the validity and update of supplier data and to ensure their adequacy.

D9) PRODUCT QUALITY AND SAFETY (SS-S1)

We implement our business objectives within the framework of our Policy (<https://www.epsilonnet.gr/content.aspx?id=4650>), selecting ISO 9001:2015 as our organisational, operational, and documentation system, with a constant goal of continuous improvement at all levels.

Key operational pillars of the Group's companies include:

- Excellent internal organisation, ensuring high effectiveness and performance
- Monitoring developments in the IT sector to identify new technologically advanced products at com-

petitive prices from reliable suppliers, with the aim of transferring these competitive advantages to our customers

- Commitment to the accurate identification and satisfaction of customer needs
- Management's commitment to the application of ISO 9001:2015
- Excellent customer service

For these reasons, the company prepares an annual action plan defining the objectives and strategies for achieving them in the years ahead.



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

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



D11 ✓ PERFORMANCE IN HEALTH & SAFETY (SS-S6)

100% of the Group's employees—whether employed under permanent or fixed-term contracts, and whether working full-time or part-time—participate in the occupational health and safety management system.

During 2024, there were no incidents recorded related to this indicator (0%).

D12 ✓ CUSTOMER SATISFACTION – CUSTOMER COMPLAINTS MANAGEMENT MECHANISM (SS-S8 | SS-S9)

Excellent customer service is an integral part of our mission. To this end, we apply practices that allow us to collect customer feedback and act proactively with a mindset of continuous improvement.

Each day, an automatic invitation is sent to a random sample representing 30% of customers who contacted the company for support. Based on their responses, we identify any cases where customers encountered issues with our services.

This process is not only reviewed in the short term—i.e., during the resolution of each case—but also analysed collectively by company executives. These analyses provide insights into trends related to our products, derived from the overall customer-service experience.

D13 SOCIAL CONTRIBUTION ACTIONS

In 2024, the companies of the EPSILONNET Group contributed to society in every possible way.

1. Volunteer Team

The actions of this year's Volunteer and Social Contribution Week included:

- Voluntary blood donation – The Group's blood bank was significantly strengthened with two donation actions in Athens and Thessaloniki.
- Christmas Bazaar supporting "The Smile of the Child", featuring handmade crafts, holiday items, ornaments, and gifts created by employees and volunteers from the organisation's Creative Workshops.
- Sharing is Caring – Collection of essential items to support the daily needs of children and families supported by "The Smile of the Child".

2. Recycling

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



3. Awareness session on breast cancer

In collaboration with the Hellenic Breast Cancer Organisation "Alma Zois", employees participated in an information session with a specialised doctor, a social worker from the Association, and a volunteer-survivor.

4. "You'll Never Walk Alone"

Provision of a telephone helpline offering psychological support to all Group employees.

5. "Stronger Every Day in Body and Mind"

Provision of online fitness and Pilates programs to all employees.

6. "EPSILONNET goes Running"

Participation in the Race for the Cure Athens and the Thessaloniki Night Half Marathon.

7. International Women's Day

Awareness and education on women's rights through an online session with Sofia Nikolaïdou, award-winning author.

D14 KEY MILESTONES 2024

(Below is a faithful translation with the exact structure preserved.)

- **15.01.2024:** EPSILONNET GROUP: Acquisition of the LAVINET pharmacy software by Epsilon CSA (EPSILONNET Group company).
- **29.01.2024:** EPSILONNET Group: Leading developments in the Digital Work Card, providing nationwide scientific updates & modern software solutions.
- **01.02.2024:** EPSILONNET Group: 7 distinctions at the Accounting Awards 2024! "IT & New Technology Consultant of the Year".
- **26.02.2024:** EPSILONNET Group & National Bank of Greece: Epsilon Pay awarded 3 distinctions at the Digital Finance Awards 2024!
- **04.03.2024:** Epsilon Hospitality participates for the second consecutive year in ITB, the world's largest tourism exhibition.
- **05.03.2024:** EPSILONNET: AADE certification of "EPSILON ALL in ONE", and presentation of the digital cash register, invoicing, and ERP-POS integration solution.
- **21.03.2024:** EPSILONNET Group: Significant increase across all 2023 financial metrics, +24%

turnover growth.

- **29.03.2024:** EPSILONNET Group wins 1st place at Best Workplaces for Women Hellas 2024!
- **01.04.2024:** PCS – Silver Sponsor at the 5th Occupational Insurance Conference.
- **04.04.2024:** Data Communication presents the future of Microsoft Dynamics 365 applications at "Cloud it Up".
- **11.04.2024:** Strategic partnership between EPSILON HOSPITALITY and NanoSoft in restaurant-software solutions.
- **17.04.2024:** Launch of All-in-One and Digital Cash Register solutions by NBG Pay, National Bank of Greece and EPSILONNET Group.
- **18.04.2024:** EPSILONNET Group: Gold & Silver distinctions at the Mobile & IoT Excellence Awards!
- **19.04.2024:** EPSILONNET Group participates in the BEYOND International Innovation & Technology Exhibition.
- **22.04.2024:** EPSILON HOSPITALITY | 4 major distinctions at the Tourism Awards 2024.
- **24.04.2024:** EPSILONNET Group: Acquisition of ERP ERMIS & HR MaSter software from LAVISOFT.

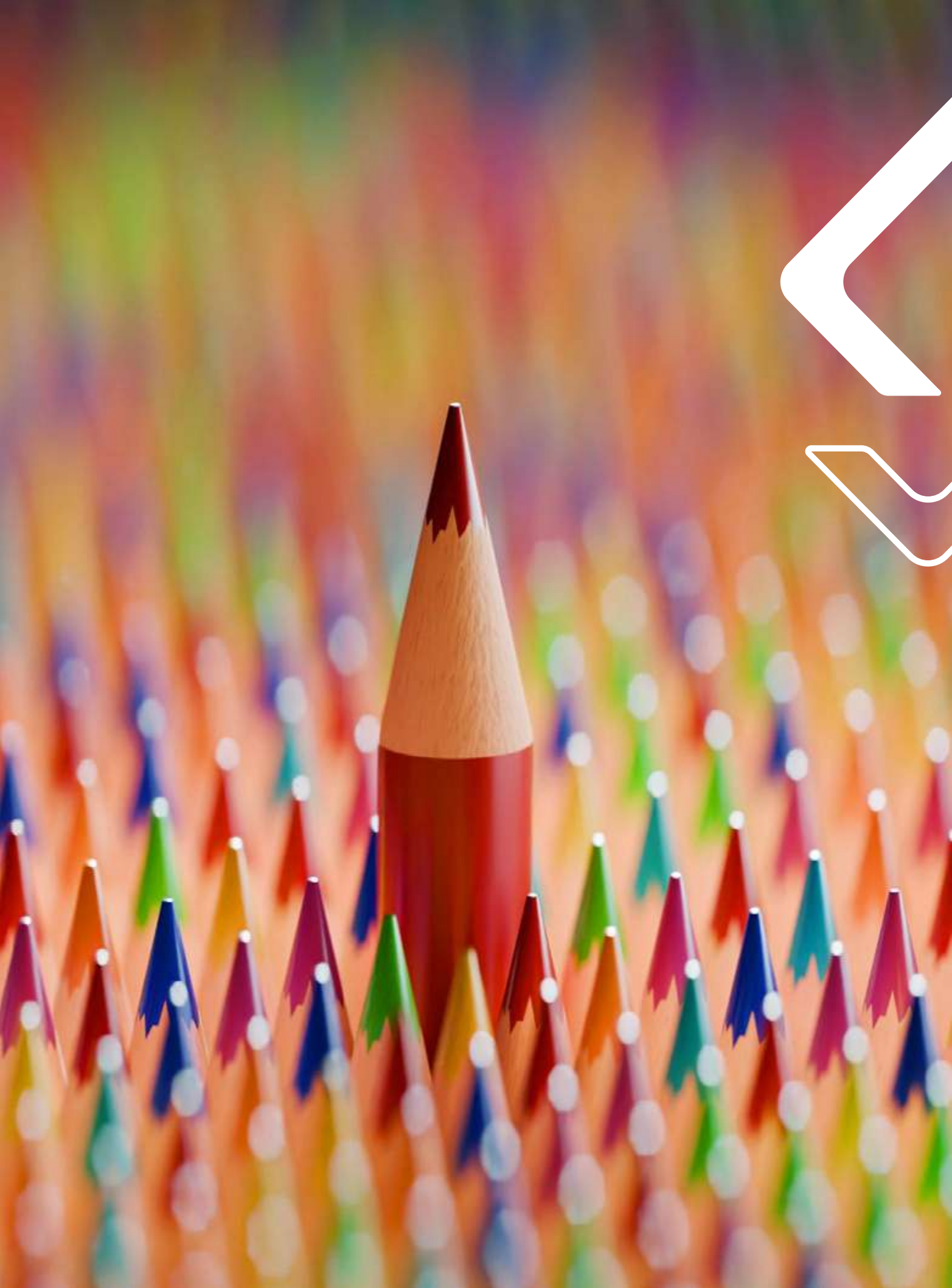




- **27.04.2024:** Submission of Public Offer by Ioannis Michos, National Bank of Greece & General Atlantic.
- **13.05.2024:** EPSILONNET Group: Among the top employers in Greece — 10th consecutive distinction at Best Workplaces Hellas!
- **27.05.2024:** EPSILONNET Group strengthens its leadership team with Vasiliki Stoubou, Natalia Symeonidou, Nikolaos Tsirgelis & Christos Chrysostomidis.
- **03.06.2024:** EPSILONNET Group awarded Cloud Provider of the Year at the Cloud Awards 2024!
- **12.06.2024:** TEPICH III: Online information day organised by EPSILONNET Group with the Hellenic Development Bank.
- **04.07.2024:** Epsilon Training: 9th consecutive double distinction at the Education Leaders Awards 2024.
- **16.07.2024:** Epsilon Digital – Certified E-Invoicing Provider | Over 15,000 businesses trust us daily for their e-invoicing.
- **30.07.2024:** EPSILONNET & Viva.com partnership for POS-commercial software integration.
- **05.08.2024:** EPSILONNET: End of Acceptance Period for the Public Offer.
- **19.09.2024:** EPSILONNET Group: 4th consecutive “Software Company of the Year” at the BITE Awards 2024.
- **27.09.2024:** EPSILONNET: Delisting from the Athens Stock Exchange.
- **11.10.2024:** B2B e-Invoicing becomes mandatory.
- **15.10.2024:** New dual distinction for EPSILONNET’s workplace environment.
- **16.10.2024:** Finance & Accounting Awards 2025 powered by EPSILONNET.
- **04.11.2024:** Epsilon Hospitality: 4 Gold Awards at the Greek Hospitality Awards 2024.
- **06.11.2024:** EPSILONNET Group: All solutions compliant with the new Digital Delivery Note.
- **10.12.2024:** Panagiotis Kalandrakis appointed new General Manager, Epsilon SingularLogic Retail & Fuel.
- **19.12.2024:** EPSILONNET: Acquisition of autonomous building complex in Athens.
- **20.12.2024:** Acquisition of Business Software by Technolife.


E. GOVERNANCE





CORPORATE GOVERNANCE & ESG

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.



EPSILONNET defines the strategy and sets the general guidelines, policies, and principles that govern the operation of all its subsidiaries. The Company is structured in a way that facilitates decision-making and implementation within the framework of the Group's strategy.

By decision of the Board of Directors of EPSILONNET, taken on 16 July 2021, the Company decided to replace the then-applicable Corporate Governance Code and adopted the Hellenic Corporate Governance Code (HCGC), June 2021 edition, with the deviations listed in the 2023 Corporate Governance Statement.

The HCGC has been developed by the Hellenic Corporate Governance Council (HCGC), a recognised body pursuant to Article 17 of Law 4706/2020 in conjunction with Decision No. 916/07.06.2021 of the Board of the Hellenic Capital Market Commission. The Hellenic Corporate Governance Code is tailored to Greek legislation and the Greek business environment and is drafted on the “comply or explain” basis, covering topics that go beyond existing laws and regulations.

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

The Board of Directors is responsible for the management and representation of the Company, the administration of its assets and, in general, the pursuit of its corporate purpose. It decides on all matters relating to the Company within the scope of its purpose, except for those matters which, by law or by the Articles of Association, fall under the exclusive competence of the General Meeting.

The Board of Directors of the Company is composed of individuals with the necessary integrity and reputation and has a sufficient number of members with an appropriate mix of knowledge, skills, and experience

required to perform its duties, in line with the Group's business model, strategy, and sustainable development objectives.

In this context, the Vice-Chairman of the Board of Directors of EPSILONNET, who also oversees the preparation of the 2024 Sustainability Report, participated in a series of relevant seminars. The Company ensures that Board members understand and are familiar with the Company's corporate governance framework, as it arises from legislation, the Corporate Governance Code, and the Code of Business Ethics applied by EPSILONNET.

The Company's Board of Directors is as follows:

- **IOANNIS MICHOS**, *Chairman & Chief Executive Officer*
- **PANTELEIMON MANIS**, *Vice-Chairman of the Board*
- **VASILIKI ANAGNOSTOU**, *Deputy Chief Executive Officer*
- **IOANNIS KOUTKOUDAKIS**, *Board Member*
- **VASILEIOS PRASSAS**, *Board Member*
- **PASCHALIS MICHALOPOULOS**, *Board Member*
- **ANDREAS GRIMBELAS**, *Board Member*
- **AIKATERINI DASKALOPOULOU**, *Board Member*
- **GEORGIOS MARINOS**, *Board Member*
- **DIMITRIOS GKINOGLU**, *Board Member*

The term of office of all members of the Board of Directors expires on **30/06/2029**.

The Company ensures diversity and adequate gender representation on the Board of Directors, and more broadly guarantees equal treatment and equal opportunities, while securing a broad range of qualifications and skills among Board members.

In 2024, the Board of Directors met 14 times. The participation rate of Board members in these meetings was 95%.

At Board meetings dealing with the preparation of the Company's financial statements and at meetings where items subject to approval by the General Meeting with increased quorum and majority (under Law 4548/2018) were discussed, the Board was in quorum, with all members present, as well as the Internal Auditor.

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



AUDIT COMMITTEE

The Audit Committee met twelve (12) times in 2024.

Its main responsibilities include:

- Monitoring the statutory audit of the Company's separate and consolidated financial statements
- Monitoring the financial reporting process
- Monitoring the effectiveness of the internal control systems, quality assurance systems, and risk management of the Company
- Providing general guidance to the Internal Audit Department regarding the audit framework and activities to be examined
- Being regularly informed of the progress of the Internal Audit Department's work

Remuneration & Nomination Committee

The Remuneration & Nomination Committee met four (4) times in 2024.

Its main responsibilities are:

- To make proposals to the Board of Directors regarding the Remuneration Policy
- To make proposals to the Board regarding the remuneration of persons falling within the scope of the Remuneration Policy
- To review the information included in the final draft of the Annual Remuneration Report and provide its opinion to the Board of Directors
- To identify and propose to the Board suitable candidates for appointment as members of the Board of Directors



Governance Regulations & Policies

For the proper governance of the Group, the following regulations and policies are applied:

1. Audit Committee Regulation
2. Remuneration & Nomination Committee Regulation
3. Remuneration Policy
4. Internal Operating Regulation
5. Board of Directors Internal Operating Regulation
6. Code of Ethics & Conduct
7. Board Members' Suitability Policy
8. Sustainability Policy
9. Human Rights Policy
10. Policy against Violence and Harassment in the Workplace



E3 MATERIAL TOPICS (C-G3)

We engage in ongoing, inclusive dialogue with our Stakeholders or their representatives, recognising that they exert direct influence on our sustainable development.

In the process of determining material topics, we communicate with Stakeholders to identify the most important issues related to our business activities and to record our responsiveness to their needs, concerns, and expectations.

Based on guidance documents and following an assessment of material topics by the Board of Directors, EPSILONNET presents the following **table of material topics**:

Substantive Issues	Inside the Company	Outside the Company
Protection of Personal Data	Company Shareholders Commercial Network Regulatory Authorities	NGOs / Civil Society Organisations Central Government / Local Authorities Customers (Individuals & Businesses) Academic Community / Media
Employee Health & Safety	Company Employees Shareholders Commercial Network	NGOs / Civil Society Organisations Media
Safe Use of New Technologies	Company Employees Commercial Network Regulatory Authorities	NGOs / Civil Society Organisations Central Government / Local Authorities Customers (Individuals & Businesses) Academic Community / Media
Anti - Corruption	Company Shareholders Commercial Network Regulatory Authorities	NGOs / Civil Society Organisations Central Government / Local Authorities Customers (Individuals & Businesses) Academic Community / Media
Non-Discrimination	Company Employees Commercial Network	NGOs / Civil Society Organisations / Media
Diversity & Equal Opportunities	Company Employees Commercial Network	NGOs / Civil Society Organisations / Media
Service Quality	Company Employees Commercial Network	Customers (Individuals & Businesses) / Media
Profitability	Company Shareholders	Media
Procurement Practices	Company Commercial Network	Customers (Individuals & Businesses) Suppliers

E4) BUSINESS ETHICS POLICY (C-G5)

To reinforce its commitment to its principles and values, EPSILONNET deemed it necessary to further strengthen its Internal Regulatory Behaviour System at all levels, implementing a series of rules that must be observed and respected across the organisation.

Compliance with the **Code of Ethics** further strengthens the common framework of principles that must be adhered to by everyone, regardless of function or hierarchical level. It is a key component of the corporate culture and safeguards the sound development of both the Group and its members.

The Code encourages behaviour based on best practices in business ethics and conduct, and on applicable legislation in the areas of human rights, working conditions, environmental protection, and anti-corruption. Its purpose is to guide decision-making in situations where dilemmas regarding the proper conduct and handling of issues related to business ethics may arise.

The Group seeks to ensure compliance with its ethical principles and standards in its relationships with all partners (e.g., suppliers and other external collaborators).

E5) DATA SECURITY POLICY – CUSTOMER PRIVACY (C-G6 | SS-S2)

The Management of EPSILONNET is committed to handling **Information Security Management** issues with the same level of responsibility and importance as any other core business function. This approach maximises value for customers and employees.

The smooth operation of the organisation and the execution of its activities depend heavily on the uninterrupted operation of its information systems and the protection of the information processed.

The growing number of factors that may lead to Information Security breaches or disruption of normal operations makes it imperative to adopt best prac-

tices and measures to minimise the likelihood of such incidents.

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

- The **technical security measures and techniques** used to protect hardware, software, data, and telecommunications, as well as the proper use of equipment and confidential information by users
- The **organisational and administrative**

measures defining the roles and responsibilities of staff and external collaborators

- The **physical security measures** applied at the Group’s facilities

The Information Security Policy has been revised to ensure full compliance with the requirements of the **EU General Data Protection Regulation (GDPR)** and follows the international standard **ISO 27001:2013**. Management fully supports the Information Security Management System in accordance with this standard and, in consultation with staff, is committed to setting objectives and targets which are regularly reviewed to remain within the defined specifications.

The secure and reliable operation of the Group’s information systems is based on its two Data Centers, located in Pylaia (Thessaloniki) and Melissia (Attica), both certified under **ISO 27001:2013**. The Group invests in new-generation hardware and modern software to ensure the highest possible level of secure and uninterrupted operation of its IT systems.

To fully ensure the **Business Continuity** of the Group, a comprehensive Business Continuity Plan has been developed, which, in addition to the two Group Data Centers, also provides for the use of Microsoft Azure cloud resources. Accordingly, the Group has reserved the necessary resources on Microsoft Azure.

A summary of the results of the Information Security Policy implementation in 2024 and the corresponding targets for 2025 is presented below:

Targets 2024	Results 2024	Targets 2025
Availability > 99%	Availability 99.98%	Availability > 99%
Increase the use of Microsoft Azure cloud infrastructure	Achieved a 30% increase in cloud infrastructure usage	Upgrade network infrastructure with next-generation, threat-focused firewall (NGFW)
Procurement of new hardware and software systems to enhance the Group’s information security level	Procurement of a new integrated Offsite Backup–DR system; procurement of an integrated MDR and SOCaaS system	Full compliance with the NIS2 regulation

Furthermore, in 2024 there were no instances in which user data were used for secondary purposes or requested by governmental or law-enforcement authorities, and no fines were imposed for such issues.





BUSINESS ETHICS BREACHES (A-G2)

In 2024, there were **no financial losses** arising from breaches of business ethics.

Targets 2024	Results 2024	Targets 2025
Zero incidents of corruption, unfair competition, anti-competitive behaviour, anti-trust or monopolistic practices. Full compliance with social and environmental laws and regulations. Strengthened communication and training on anti-corruption policies and procedures.	Target achieved (100% performance).	Maintain zero incidents of corruption, unfair competition, anti-competitive behaviour, anti-trust or monopolistic practices, and ensure continued full compliance with applicable social and environmental laws and regulations.



WHISTLEBLOWING POLICY (SS-G1)

Compliance with both the letter and, primarily, the spirit of laws, regulatory and supervisory rules and principles, as well as with market best practices, is an integral part of EPSILONNET Group's corporate culture.

The Group has adopted a **Policy against Violence & Harassment** to ensure that all employees can work in an environment free from violence, unlawful harassment, discrimination, and retaliation. The Group makes every reasonable effort to ensure that all persons bound by this Policy are familiar with it and know that any complaint regarding its violation will be thoroughly investigated and appropriately resolved.

Under the Policy, it is explicitly stated that all forms of discrimination, violence, and harassment that occur during work, are connected to it, or arise from it are strictly prohibited.

Within this framework, we encourage the reporting of all incidents of discrimination, violence, harassment, or retaliation that come to anyone's attention—regardless of the identity or position of the perpetrator. A specific **complaints reception and investigation process**

has been established, along with appropriate mechanisms to ensure impartial, fair, timely, thorough, and objective investigations.

Complaints regarding behaviour that violates this Policy are accepted in writing, either named or anonymous, and are investigated immediately and thoroughly. The investigation may include individual interviews with the parties involved and, where necessary,

with persons who may have witnessed the behaviour or may possess relevant information. All collected material is kept in a dedicated file, in line with Law 4624/2019 and the Group's Data Protection Policy.

In the near future, the EU Directive on **Whistleblowing** is expected to be consulted and adopted. Once this happens, the current process may be amended accordingly.





E8 MANAGEMENT OF CRITICAL RISKS (SS-G2)

Risk management is based on the definition of objective targets, which allow us to identify the most significant events that could affect the Company, assess the associated risks, and decide how the Group's companies will respond to them.

Among the key risks identified are:

- Risks from fire in the building
- Risks associated with seismic events
- Risks arising from other similar emergency situations

These are recorded in the risk register.

The EPSILONNET Group has formed volunteer safety teams, composed of Group employees who receive specialised, ongoing training to be able to respond to emergencies and assist in such situations.

In addition, the Group's Operations Directorate

has prepared emergency guidelines, which have been communicated to all employees working in the Group's buildings, in order to maintain a high level of preparedness and effectiveness in dealing with emergency situations.

The guidelines communicated to staff include:

- Building evacuation procedure
- Procedure in case of earthquake
- Procedure in case of fire
- Procedure in case of flooding or leakage
- Procedure in case of telephone threat

As part of the assessment, no critical risks were identified that relate to accidents or emergency incidents that could cause significant environmental or external impacts.

E9

MANAGEMENT
OF SYSTEMIC
RISKS (SS-G3)

The coordination of the Group’s Risk Management process is undertaken by the Audit Committee.

In the latest Group-level Risk Management review, the four most significant risks in terms of estimated quantitative impact were identified as:

1. Changes in the Business Model
2. IT Security
3. Shortage of specialised personnel
4. Negative developments in the activity of major technology providers

E10

FUTURE
TARGETS

Area	Topic	Target
Environment	Direct and indirect emissions	<div><div>• Increase the share of hybrid vehicles in the fleet by 25% by the end of 2025</div><div>• Reduce direct and indirect emissions by 30% by 2030</div></div>
	Training hours of human resources	<div><div>• Maintain training hours in 2025 and increase them by 10% by 2026</div></div>
People	Inclusion	<div><div>• Continuous establishment of programs on diversity, within the framework of the Group’s signed Diversity Charter, and ongoing development of an inclusive culture</div></div>
	Supplier evaluation	<div><div>• Develop supplier evaluation forms and assign scoring based on their maturity in sustainable development issues by 2026</div></div>
People Governance	Personal data	<div><div>• Ongoing training on personal data issues and maintenance of zero data-breach incidents through 2026</div></div>





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