



ATHENS
INTERNATIONAL AIRPORT
ELEFThERIOS VENIZELOS

Human Rights policy
Athens International Airport S.A.

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Approval:

This Policy has been approved by the Board of Executives of the Company by virtue of resolution dated 9.12.2024

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1. Purpose & Scope

AIA seeks to protect and promote human rights within the framework of its operations both on an individual and collective level taking preventive actions in order to avoid acts and/or omissions that may be detrimental to human rights.

The primary purpose of this Policy is to raise awareness and ensure the commitment of all those employed by the Company, whether as employees or non-employees, suppliers or external partners, to the Company and it is applicable to all AIA Employees, AIA Management and Board of Executives and the members of the Board of Directors.

It is important to note that the Company has zero tolerance for behaviour and situations that violate human rights and ensures that it cooperates with suppliers and other third parties that adopt similar policies.

The Company fully complies with the requirements of Greek and EU legislation and human rights standards.

This policy is available via corporate Intranet and Internet.

2. Terms & Abbreviations

Term/ Abbreviation	Definition of Term/ Abbreviation
BoD	Board of Directors
Company	The company under the name Athens International Airport S.A. (AIA) and the brand name "ATHENS INTERNATIONAL AIRPORT ELEFTHERIOS VENIZELOS"
EU	European Union

3. Sources of compliance

This Policy is based on the following:

- Fundamental principles of the Greek Constitution
- Principles of the United Nations Universal Declaration of Human Rights
- European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR)
- Charter of Fundamental Rights of the European Union (2000/C 364/01)
- Convention 108 of the Council of Europe and its updates
- United Nations Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- United Nations Global Compact (UNGC)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Declaration on Fundamental Principles and Rights at Work of the International Labor Organization
- UN Sustainable development Goals and the 2030 Agenda on Sustainable Development

4. Roles

- The **Board of Directors (BoD)** is responsible to:
 - endorse this Policy.

- The **Board of Executives (BoE)** is responsible to:
 - review and approve this Policy and lead application across the Company.
- The **Director, Human Resources** in cooperation with **Director, Legal Affairs & Corporate Governance** are responsible to:
 - ensure that this Policy remains updated and represents best practice.
 - review periodically the Policy and propose any amendments, changes to BoE for approval.
- The **Director, Human Resources** in cooperation with the **Manager, Regulatory Compliance, Data Protection & Ethics** are responsible to:
 - oversee the implementation of this Policy within the Company.
- **AIA Management** is responsible to:
 - adhere to this Policy.
 - ensure that employees in their area of responsibility understand and align with the provisions of this Policy.
- **AIA Employees** are responsible to:
 - comply with this Policy, stay informed and follow the provisions of this Policy.

5. Respect and Protection of Labor and Social Human Rights

The Company proactively ensures the protection, respect and observance of human rights while implementing action plans in the event of any violation awareness.

5.1. Working Conditions

The Company provides employees with working conditions that are consistent with its operation and their duties. Maintaining open communication channels to resolve any problems that may arise within the applicable labour legislation and the Collective Labor Agreement.

5.2. Health & Safety

The health & safety of people within the Airport site and Company Premises is a strategic objective for the Company, establishing policies and adopting practices of high standards in the workplace and its business relationships, monitoring and assessing risks according to relevant corporate policy. An Occupational Health and Safety Committee is elected by AIA employees according to applicable legislation ensuring open dialogue and focus on health & safety area in the Company.

5.3. Security

The Company implements, as required by the National Civil Aviation Security Regulation, an Airport Security Programme approved by the Hellenic Civil Aviation Authority (HCAA), which establishes procedures, practices and measures towards the deterrence and response to acts of unlawful interference against civil aviation. In the midst of its implementation, as a predominating priority, the Airport Security Programme equally serves as a tool, protecting the lives of employees, passengers and visitors and also safeguards the facilities, infrastructure, aircraft, equipment or other property within the Airport premises.

5.4. Right of Association and collective bargaining

The Company fully respects and complies with the legal framework regarding the right of employees to organize and collectively bargain, ensuring that unionized employees are not treated differently. The Company fosters dialogue and negotiates in good faith with the established union.

5.5. Disciplinary practices

Disciplinary measures that may be imposed will be in accordance with applicable national and EU legislation and actions will not violate human rights at work.

5.6. Prohibition of Discrimination/Violence and Harassment at Work

The Company respects and promotes diversity and equal opportunities regardless of race, religion, nationality or ethnicity, class, color, age, gender, disability, marital or economic status, sexual orientation or gender identity, political opinion or any other situation that is protected by national, EU or international law.

The Company will not tolerate any form of violence and harassment and any occurrence will be investigated as per Company policies and reported to the relevant authorities.

5.7. Slavery, forced labour, child labour and human trafficking

The Company condemns and prohibits any form of forced or compulsory labour, or labour under onerous conditions or slavery and human trafficking, taking any necessary measures to this end. It recognizes its responsibility to being aware of any risks within its environment.

The Company respects the laws of minimum ages of employment and all employees have employment contracts signed in a language they can understand including agreed employment terms and conditions.

5.8. Personal Data Protection

The Company is committed to the protection of personal data, in compliance with the European and National legislation for the protection of individuals from the processing of their personal data, as applicable and in force from time to time, taking appropriate technical and organizational measures, according to relevant corporate policy. AIA's processing of personal data in the course of airport operational and corporate activities is carried out as to ensure ultimate protection and/or respect of fundamental human rights and freedoms, to safeguard public security and the prevention, investigation and detection of unlawful actions, including the safeguarding against the prevention of threats to human life, aerodrome premises, aircraft and critical equipment.

5.9. Anti-Corruption

The Company is committed to conduct business in an honest and ethical manner, and act with professionalism, fairness and integrity in all business relationships and transactions.

The Company ensures compliance with applicable legislation and implements leading business practices according to the relevant corporate policy presenting zero tolerance to any form of corruption or suspected misconduct. Violation of the corporate policy results in disciplinary actions for the employee(s) involved,



while the Company reserves the right to refer the case to the police, judicial and/ or supervisory authority and to bring legal action against the person(s) involved.

5.10. Environmental Protection and Local Communities rights

AIA is fully committed to protecting and caring for the environment, preventing negative impacts, and minimizing, to the extent possible, annoyance for local communities due to the operation of the airport. The Company continuously strives to cultivate a culture of caring for the environment within the entire Airport Community, prioritizing the significant challenge of climate change by reducing its greenhouse gas emissions and regularly assessing the relevant climate risks. We encourage our employees to focus on maximizing energy efficiency in our operations and infrastructure. The Company is fully compliant with the applicable legal framework and seeks, where possible, to go beyond legal requirements for environmental protection. The Company develops and implements an annual Community Engagement Plan comprised of activities and initiatives to support local communities while maintaining an open dialogue with local authorities and residents.

5.11. Corporate Social Responsibility (CSR)

At AIA, we are committed to upholding the principles of corporate social responsibility (CSR) by integrating human rights into our business practices. We recognize our responsibility to positively contribute to the communities in which we operate, while fostering an inclusive, ethical, and sustainable environment. Our CSR initiatives focus on creating long-term social value, promoting education, supporting local economic development, and protecting the environment. We strive to ensure that our operations have a beneficial impact on society, uphold the dignity of all individuals, and align with international human rights standards. Through transparent communication and proactive engagement with our stakeholders, we aim to build trust, encourage diversity, and promote human rights both within and outside our organization.

6. Policy Implementation

AIA is committed to upholding human rights across every facet of its operations, and, that the application and oversight of the principles outlined in this document rely on a suitable due diligence process.

6.1. Awareness

The Company ensures that it identifies and prevents situations that endanger human rights by informing and training all its employees, in accordance with this Policy. Human Resources department (HRE) is responsible for the following provisions:

- Information to employees including publication of this Policy, intranet communication, internal workshops/sessions/seminars etc.
- Training through e-learning courses assigned to all employees and as part of the induction training to new employees.

Awareness to third parties is achieved through the acknowledgement of this Policy, as well as the Business Partners Code of Conduct

6.2. Monitoring and Evaluation

Monitoring and evaluating the faithful observance of the principles of this Policy and its effectiveness is important for the safeguarding of human rights. The Director, Human Resources in cooperation with the Manager, Regulatory Compliance, Data Protection & Ethics have the responsibility to observe the proper implementation of this Policy within the Company and propose reviews, as it may be required, for revision submission to BoE.

6.3. Violations Reporting

This Company Policy must be strictly observed by everyone without exception. No violation will be accepted and in fact, in case of violation of its principles, the procedure for the imposition of legal sanctions will be activated.

If there is suspicion that a principle related to human rights is violated, then the relevant report/complaint should be submitted to the Company in accordance with the Whistleblowing Policy, the Policy on Prevention and Combating of Violence and Harassment at Work as well as this Policy.

7. Related documents

Document Ref No	Document Title
HRE-020301-PL	Code of Business Conduct
POLICY-CEO005	Code of Relations with Business Partners
PL-CEO011	Whistleblowing Policy
POLICY-CEO010	Workplace Violence and Harassment Prevention
COC-010201-PL	Risk Management Policy
COC-010101-CH	Corporate Risk & Control Charter
DPC-020101-PL	Corporate Compliance Policy
MANUAL-HRE001	Occupational Health & Safety Manual
POLICY-CEO004	Environmental Policy
POLICY-CEO009	Personal Data Privacy Policy
DPC-030201-PL	Anti-Corruption Policy
SPR-010101-PL	Sustainability Policy
MANUAL-SES001	Airport Security Program
HRE-010101-CP	Training & Development Manual

8. Approval and Review

This Policy is approved by the Board of Executives, to be reviewed periodically and revised if required and endorsed by the Board of Directors.