

19














The best
travel
companion

SUSTAINABILITY REPORT





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Covid Response and Business Continuity of Nea Odos

1st semester of 2020 (January-June)

€113,082

in employee protection and business continuity initiatives



3,479

litres of antiseptics
for surfaces and
personal use



52,565

surgical masks



60,000

gloves



46

thermometers



Full telephone and
electronic services
for all drivers and
subscribers of the
motorways



Informative video
titled: **"We will stay
home for a while
longer"**



236

preventive
disinfections at the
company's facilities

€29,885

the investment



11

briefings/guidelines
to all employees



Implementation
of Return
from Telework
Protocol



Expanding
cooperation with
a specialized
diagnostic center



Purchase of
surgical masks for
the Fthiotida Police
Force



Creation and
posting of posters
in all facilities and
Customer Service
Departments



Infrastructure
Preparation for
Teleworking
and Remote
Management



€11,000

for the purchase
of technological
equipment



Additional
equipment for
remote work



Preparation
of an
operation
plan with
security
personnel



Expansion of the
VPN system for
remote work



Dear stakeholders,

Sustainable Development plays a central role in the strategy and daily operation of Nea Odos. Our goal is to offer to every driver a safe, modern road environment and at the same time quality road safety and customer services, while recognizing the interaction of our activities with the environment and the local communities.

In 2019, following the full integration and completion of the project, we continued to serve and strengthen our long-term business goals, based on the following key priority areas:

Utilization of technology through innovative initiatives.

We are committed to utilizing new technologies and innovation to reduce gas emissions as well as to innovative services with a low energy footprint.

We should and can operate the safest ever, greenest and most innovative motorways in the country. To accomplish this:

- we intensively prepare the implementation of the full interoperability of electronic toll payment services among the Greek motorways,
- we systematically promote electromobility on our motorways, with Ionia Odos being the first motorway in Greece that provides the possibility of charging along its entire length,
- we strengthen part of the CCTV network with artificial intelligence capabilities and video analytics for the early detection and warning of dangerous events, such as traffic in the opposite direction,
- we monitor the developments in the field of mobility, while we intend to further develop the interaction between the driver and the infrastructure, while offering a new experience to the subscribers of the electronic toll payment service through the MyOdos application that we are now designing.



The improvement and modernization of all processes of our operation. Adopting new business practices for the joint management of social, environmental and management issues at the Ionia Odos motorway and at the A.Th.E. section, we optimize our performance and the management of available resources. Nea Odos S.A. holds a series of certifications, including certification for the Quality Management System according to ISO 9001: 2015, the Safety and Health Management System according to OHSAS 18001: 2007 and the Environmental Management System according to ISO 14001: 2015, while also implementing a Road Safety Management System of the corporate vehicle fleet, certified according to the ISO 39001: 2012 international standard, making Nea Odos the first, second generation concessionaire to receive this particular certification. This certification is a milestone for the safe and efficient management of the corporate vehicle fleet while demonstrating in practice our commitment to implementing good safety practices on the motorway. But we do not stop here. In 2019, the company prepared the Business Continuity Plan, a plan which the company was called upon to implement in 2020 at the beginning of the pandemic, while in 2020, the company will certify it according to ISO 22301: 2012, gaining another industry first and enhancing the drivers' sense of security even in the most difficult conditions.

The support and development of the neighbouring local communities. We contribute to Social and Environmental Development given that we view it as an integral part of our philosophy. We actively support the local communities that are adjacent to our project, both in the field of environmental protection and their economic development, by implementing long-term programs and specialized initiatives. Nea Odos designed and implemented the Boosting Recycling Initiative, a project to improve and strengthen the corporate recycling system with spectacular results, substantially contributing to the protection of the environment and now being a model motorway as regards recycling. At the same time, it offered the possibility of recycling at the source to the drivers, during their journey, at all Motorist Service Stations and at all parking spaces. Finally, through the DIADROMES microsite that we are currently designing, we intend to further strengthen the neighbouring local communities, contributing to their promotion and to their tourism development.

Empowerment of human resources. We are constantly on the outlook for ensuring the maximum possible satisfaction of employees and partners and thus we take initiatives to strengthen our corporate identity and culture. Our concern is to continue providing a work environment that promotes personal and professional development, a sense of security while supporting and improving the quality of life of each employee. Although this publication refers to 2019, since its writing was completed in mid-2020, it is impossible not to mention the biggest challenge we have been called upon as a country and as a company to manage to date, which is none other than the outbreak of the COVID-19 pandemic. Under these unprecedented for everyone professional, family and personal conditions, the company stood by the side of employees and drivers, having from the first moment the health protection of everyone as its absolute priority, while maintaining in full operation its motorways to serve the supply chain, to assist the state mechanism in its efforts to manage the spread of the pandemic, but at

the same time maintaining job security for its staff, based on a long-term relationship that is governed and inspired by values of solidarity, responsibility and trust. I want to thank personally and from the bottom of my heart the whole team, but also each one individually for their continuous assistance in facing this challenge.

In this difficult time, we are committed to all our stakeholders to continue to act responsibly towards our fellow citizens, employee and the society as a whole, integrating the principles of sustainable development in our strategic planning. Through the implementation of the 17 Sustainable Development Goals, sustainable development becomes a common vision in which we are all participants and co-shapers. With optimism, but mainly with undiminished dedication, we continue to create value for all our stakeholders and to be leaders in our industry.

Rodianos Antonakopoulos,
CEO





AT A GLANCE



Road Safety

- **41,501** manhours invested in road infrastructure inspections
- Over **7,400** vehicles safely towed
- **91.8%** of subscribers feel very/fairly safe when driving through Nea Odos

Manhours for Road Maintenance

2019	2018	2017
251,093	221,269	106,215

Primary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES AND COMMUNITIES

Secondary Sustainable Development Goals



17. PARTNERSHIPS FOR THE GOALS



Quality in Services

- **8,980,044** electronic transactions performed in Nea Odos' Toll Stations
- Invested over **€2,387,744** in subscription programs
- **94.7%** of subscribers are very/fairly satisfied with the service at Customer Service Centres

Primary Sustainable Development Goals



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE

Secondary Sustainable Development Goals



17. PARTNERSHIPS FOR THE GOALS



Caring for the Environment

- Recycled **16,334 kg** of materials with the new corporate recycling system
- Invested over **€1 million** in environmental protection projects
- Planted **10,350** trees along the A.Th.E. motorway

Primary Sustainable Development Goals



12. RESPONSIBLE CONSUMPTION AND PRODUCTION



13. CLIMATE ACTION

Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



6. CLEAN WATER AND SANITATION



7. AFFORDABLE AND CLEAN ENERGY



11. SUSTAINABLE CITIES AND COMMUNITIES



15. LIFE ON LAND



17. PARTNERSHIPS FOR THE GOALS

Primary Sustainable Development Goals



8. DECENT WORK
AND ECONOMIC GROWTH

Secondary Sustainable Development Goals



3. GOOD HEALTH
AND WELL-BEING



4. QUALITY
EDUCATION



5. GENDER
EQUALITY



10. REDUCED
INEQUALITIES



16. PEACE, JUSTICE AND
STRONG INSTITUTIONS

Human Resources

- 537 employees
- 42% women
- 2,737 total training hours
- €295,352 invested in Health and Safety

Evolution of employee numbers

2019	2018	2017	2016
537	530	522	321

Cooperation with Local Communities and Social Contribution

Primary Sustainable Development Goals



17. PARTNERSHIPS
FOR THE GOALS

Secondary Sustainable Development Goals



1. NO POVERTY



3. GOOD HEALTH
AND WELL-BEING



4. QUALITY
EDUCATION



11. SUSTAINABLE CITIES
AND COMMUNITIES



16. PEACE, JUSTICE AND
STRONG INSTITUTIONS

- 61% of our suppliers originate from the local communities around the motorway
- Mobilized over €627,000 in social initiatives
- 165,065 free of charge entries for special needs vehicles

Social Product

2019	2018
€101.2 million	€109.8 million
2017	2016
€83.8 million	€80.3 million

Primary Sustainable Development Goals



16. PEACE, JUSTICE AND
STRONG INSTITUTIONS



17. PARTNERSHIPS
FOR THE GOALS

Organisation and Management

Zero incidents of non-compliance

- with user safety legislation
- with motorway signage
- with responsible communication principles
- for corruption

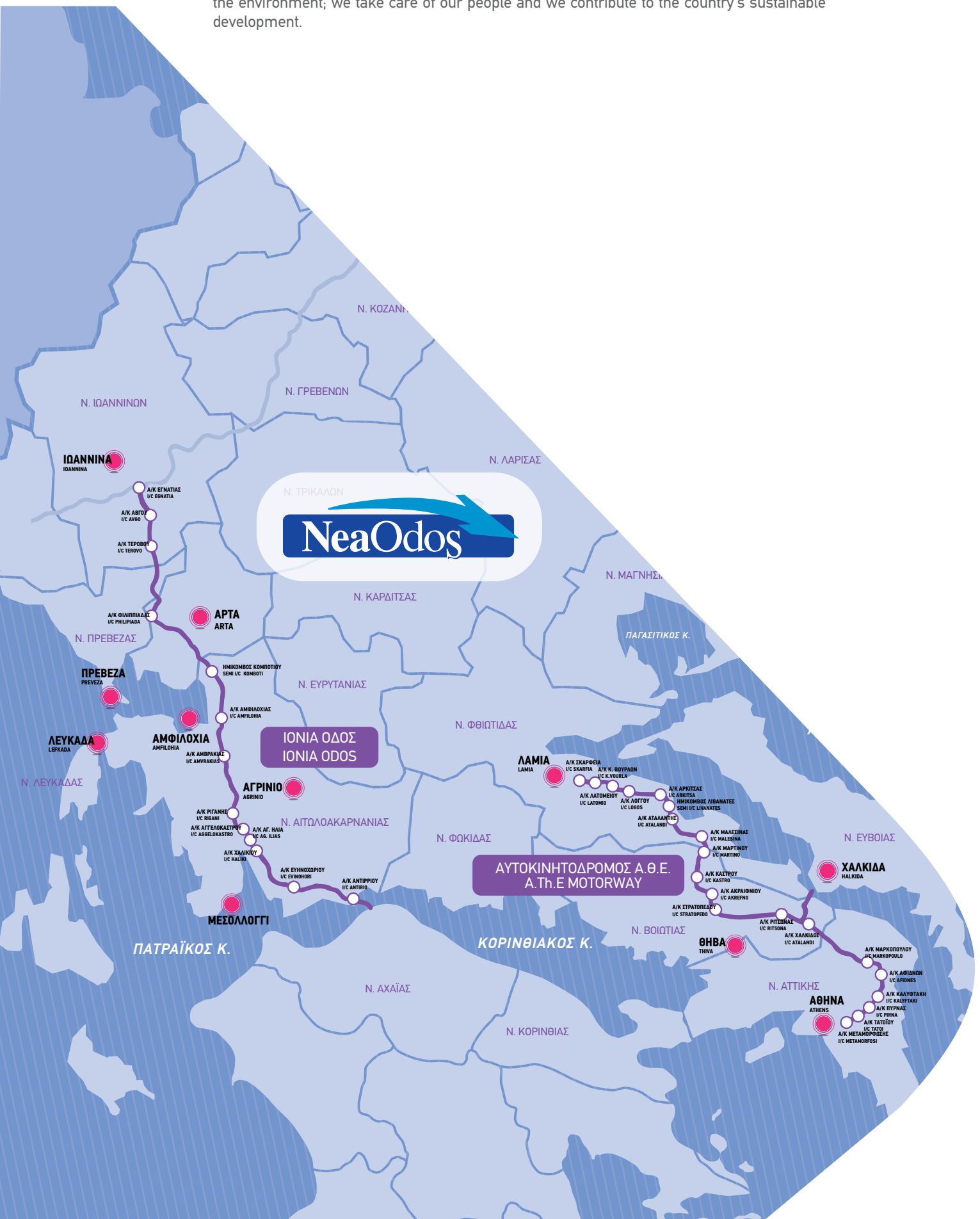
For the 5th consecutive year, we have been recognised with 2 distinctions at the Hellenic Responsible Business Awards.

We have been also awarded by the Hellenic Paralympic Committee.



Mission

We offer the highest levels of safety, together with top quality services. We pursue excellence in the operation and maintenance of our motorways. We recognize the absolute need to protect the environment; we take care of our people and we contribute to the country's sustainable development.



We are determined to change the map of Greece and to become a model for our industry. We create value for the country, our local communities and shareholders, a primary means being our people's commitment, expertise and knowledge.

Our Values

Efficiency and effectiveness

- We work daily toward a goal of development, balancing risks with opportunities
- We strive for innovation and the continuous improvement of our performance
- We optimize the use of our resources, providing value to shareholders and stakeholders

Responsibility

- We work in the interest of public well-being and environmental protection
- We are fully committed to meeting our responsibilities towards all drivers
- We encourage our people to take on responsibilities to further our organization's success

The strength of our people

- We acknowledge effort, recognize talents and support their development
- We operate as a team, united with common goals
- We appreciate different viewpoints and support constructive arguments as a means of effective cooperation
- We respect, care about and support our team members

Integrity

- We focus on building and maintaining bonds of trust with our subscribers and partners
- We encourage sincere cooperation and communication with all our partners
- We operate in a fair and transparent way, with a focus on business ethics



NEA ODOS



1.1 | The Scope of our Work

Nea Odos Concession Societe Anonyme (or Nea Odos or the Company) has as its primary objective to undertake the study, design, construction, operation, commercial exploitation and maintenance of the "Ionia Odos Motorway from Antirrio to Ioannina, A.Th.E. Athens (Metamorfosis I/C) - Maliakos (Skarfia) and the connecting branch of the A.Th.E. Schimatari – Chalkida" concession project

Nea Odos is responsible directly or through its partners for:

1. The study and the preparation of all the necessary studies (environmental, road-construction, geotechnical etc.)
2. The design of all new parts
3. The construction of all new parts
4. The operation, control and traffic monitoring, emergency event management, routine tasks (i.e., road cleaning)
5. The maintenance of the premises, the motorways, the relevant equipment, the patrol, maintenance and snow removing vehicles
6. The management and collection of tolls
7. The management of Motorway Service Stations

The primary concern of Nea Odos is to provide to every single driver a contemporary, secure road driving environment with the provision of road safety services and customer care via the experience and expertise of its employees. Our strategic goal is the operation of contemporary motorways aligned to European standards, which contribute to the development of the national economy, ensure environmental protection and upgrade the quality of life for community at large. Our primary commitment towards all Greek citizens is the safe and fast movement for everyone, in combination with the provision of high quality services.

It is worth noting that in 2019 the New Section of the "Schimatari – Chalkida connecting branch" has been completed and approved by the relevant public office, the Special Office of Public Works Designs and Constructions of Concession Projects (EYDE / KSESP).

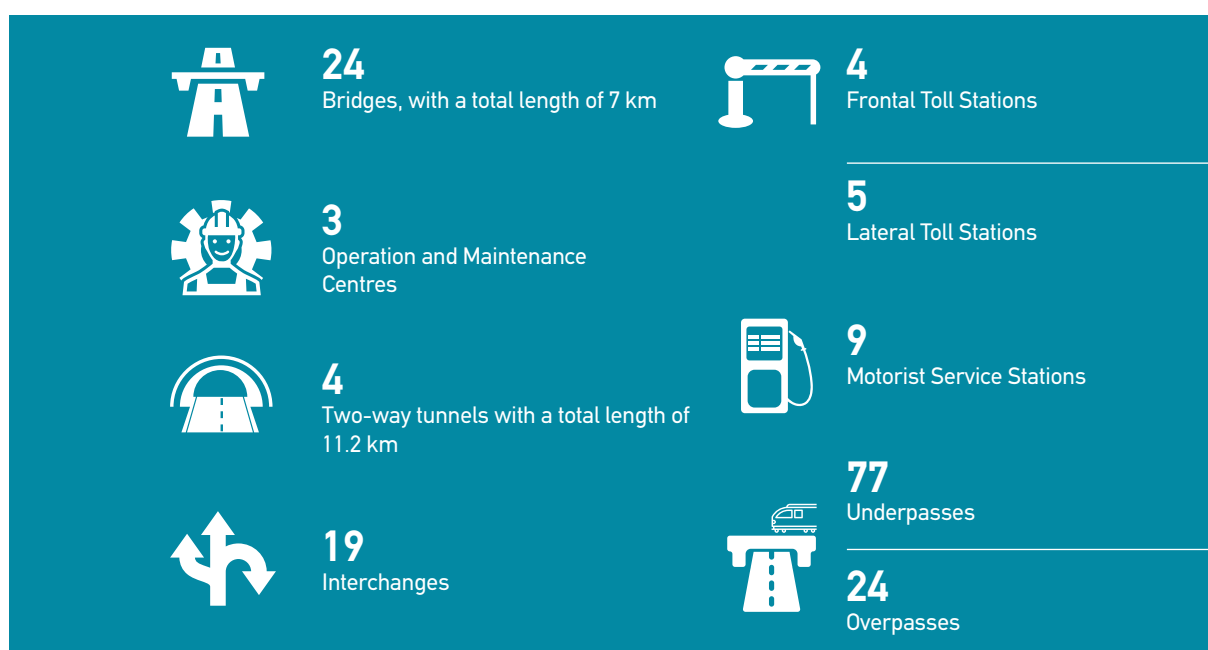
An Ambitious Project Reaches Completion | 1.2



The Concession project extends to a total length of 380 km and consists of the following three sections:

- 1) the section, within the Athens - Thessaloniki - Evzoni motorway (A.Th.E.), which starts from the Metamorfosi flyover and covers 172 km up to the flyover in Skarfia, Fthiotida, crossing the prefectures of Attica, Viotia and Fthiotida,
- 2) the Ionia Odos motorway which covers 196 km from Antirrio to Ioannina and passes through the prefectures of Aetolia-Acarnania, Preveza, Arta and Ioannina,
- 3) the Schimatari - Chalkida connecting branch, which is 11 km long.

IONIA ODOS MOTORWAY IN NUMBERS



A.Th.E. MOTORWAY IN NUMBERS



Special study of the Observatory of Road Networks in Western Greece and Peloponnese (POADEP)

The completion of the construction of the concession projects of the 2nd generation motorways - and in particular of the Ionia Odos motorway - radically reshaped the field of road transport. As the Observatory of Roads Networks in Western Greece and Peloponnese (POADEP) characteristically points out in its relevant study: "In the new reality that has been formed in the transport network of Greece in recent years, 2 large and important projects dominate: the Ionia Odos and the Olympia Odos motorways. The delivery of these two major motorways reduced transport time and increased safety. Today, travelling time between Athens and Ioannina is approximately 3 hours and 40 minutes, while the Athens - Patras driving time is about 2 hours. In addition to reducing traveling time in these 2 main routes, the two new motorways brought closer other areas of the mainland, such as Pyrgos and Kyllini (3 hours from Athens), Igoumenitsa (4 hours), the Greek-Albanian border in Kakavia (5 hours), Vonitsa, Preveza and Lefkada (3 hours and 40 minutes) as well as some important tourist destinations that until recently were deemed "faraway" such as Zagorochoria, Metsovo, Tzoumerka and Dodoni. **With the new road transport projects, there is for the first time an integrated network which connects Eastern and Western Greece with modern motorways and consequently makes the possibility for multimodality a reality as there is a connection of the Port of Piraeus with the ports of the western part of the country and consequently with the ports of Italy and all of Europe.**"

POADEP also refers to the contribution of motorways to the key issue of road safety. "It is worth mentioning that the treatment cost for patients injured in road traffic accidents is huge, so the reduction of road accidents, in addition to the obvious avoidance of the pain they cause, contributes greatly to savings of significant amounts in the state budget. **It is worth noting that during 2000 - 2015, the relevant amount amounted to €81,181,704,000, while during 2014 - 2018, during the delivery to circulation parts of the new motorways, this amount amounted to €2,398,299,200.**"

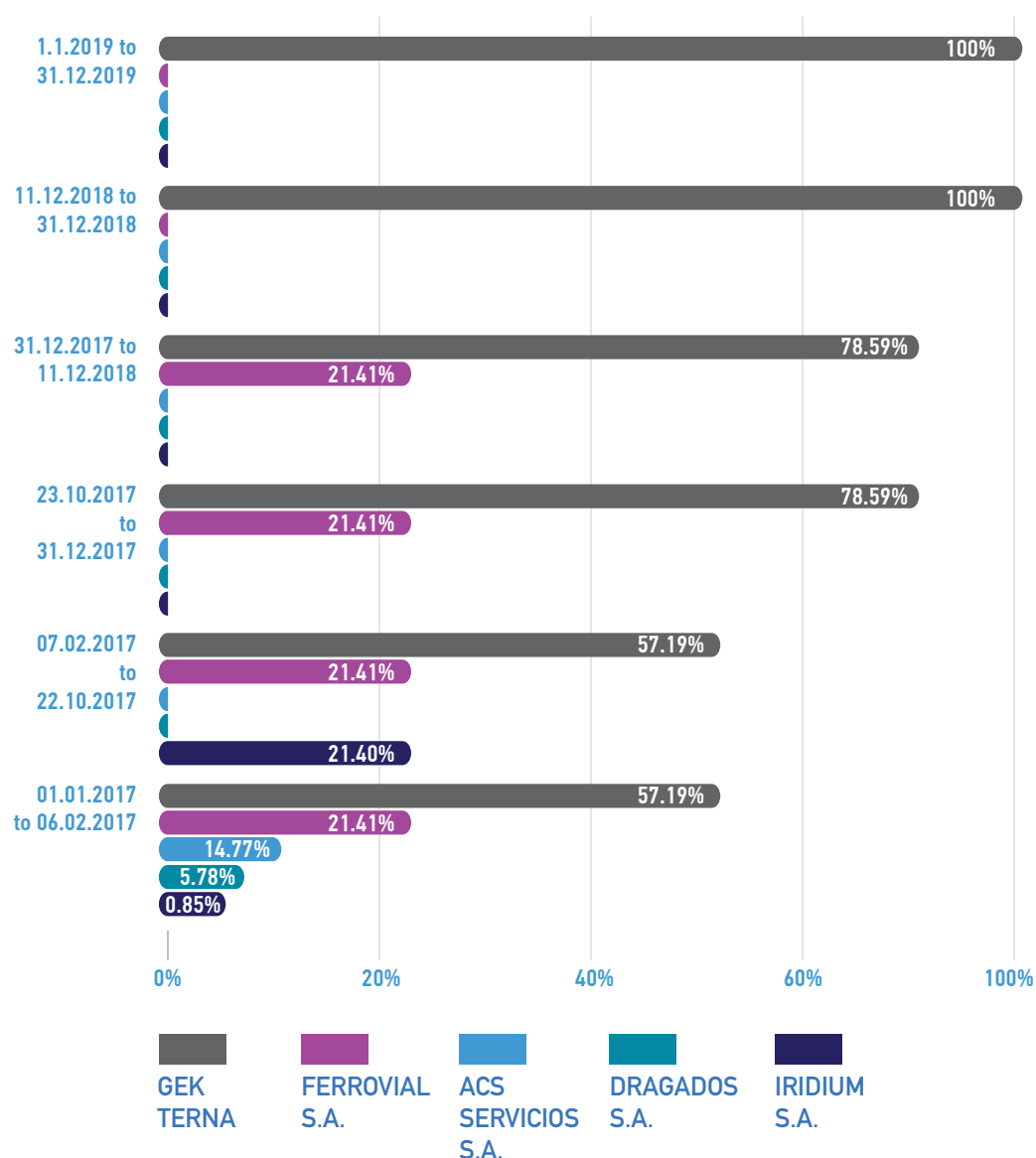
Finally, it is worth mentioning the basic conclusion of POADEP, according to which: "this is the first time that the western part of Greece, which "faces" Europe, has acquired a modern and safe integrated road network. From 2017, the completion of the Ionia Odos and the Olympia Odos motorways provides a complete connection of the main ports of south mainland Greece with a new road network and opens new horizons for the transport sector, provides new opportunities and enables the development of multimodal transport."



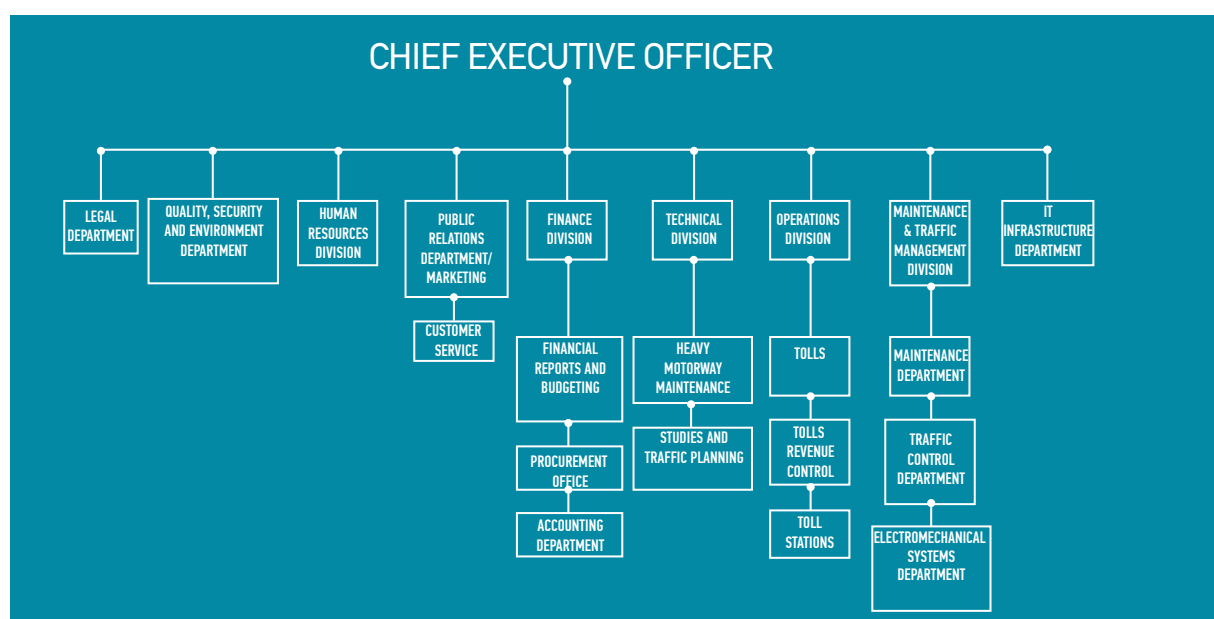
1.3 | Shareholder and Organizational Structure

The share capital of the company, which has been paid in full, amounts to €31,000,000 and consists of 31,000,000 common registered shares worth €1,00 each. During 2019, Nea Odos reduced its Share Capital with the simultaneous equal increase of the secondary debt, through the issuance of a bond loan, amounting to €85,800,980, covered exclusively by the sole shareholder company, GEK TERNA SA, based on the terms defined in the concession agreement and the loan agreements. The efficient and competitive operation of Nea Odos is ensured through a Corporate Governance system which consists of processes of full transparency, based on integrity and reliability. The system aims at safeguarding the legitimate interests of the shareholders and partners. At the same time, the effective operation of the company maximizes its flexibility and consequently offers the opportunity to meet the contemporary social challenges and expectations of its internal and external stakeholders, maximizing its contribution to society and the economy.

Nea Odos Shareholder Structure



The Chief Executive Officer is responsible for the implementation of the decisions of the Board of Directors (BoD). The organizational chart that follows presents the organizational structure of the company.



1.4 | Corporate Governance

The Board of Directors of Nea Odos comprises of ten members and decides upon significant corporate issues during predetermined meetings. The BoD decisively contributes to the smooth operation of Nea Odos as it leads and manages corporate issues to the benefit of the shareholders and all interested parties. The BoD ensures the appropriateness of the organizational structure, as it has been shaped, for implementing the corporate strategy and strategic decisions. The BoD also ensures a fair and equitable work environment for all staff, regardless of position, duties and responsibilities, based on the corporate principles and values, in a moral, impartial and socially acceptable manner.


The composition of the Board of Nea Odos is finalized aiming at its effective operation while the independent relationship of its members with the activities and operations of the company offers greater independence and objectivity regarding the expression of their opinion and their decisions. For this reason, the company provides sufficient information to all members so that they are able to form independent assessments on issues such as strategy, performance, goals, etc.

In December 2019, the composition of the Board was:

- **Emmanouil Vrailas** - CEO - Non-executive member
- **Emmanouil Moustakas** - Vice Chairman - Non-executive member
- **Stylianios Pentheroudakis** - Member - Executive member
- **Alexandros - Iosif Aligizakis** - Member - Non-executive member
- **Vasileios Delikaterinis** - Member - Non-executive member
- **Christos Zaribas** - Member - Non-executive member
- **Andromachi Pasallidou** - Member - Non-executive member
- **Alexandros Karyotakis** - Member - Non-executive Member
- **Pinelopi Lazaridou** - Member - Non-executive Member
- **Rodianos Antonakopoulos** (from 19.12.2019) - Member - Non-executive Member
- **Sofia Dimitrakopoulou** (until 19.12.2019) - Member - Non-executive member

Ms. Sofia Dimitrakopoulou passed away in December 2019 and was replaced by Mr. Rodianos Antonakopoulos who additionally took over the position of CEO of Nea Odos in January 2020.

Gender Ratio and Age Distribution of the Board of Directors

<div>Women</div> <div>Men</div>  <div>Total</div>	Members	<30	30-50	50+
	2	0	1	1
	8	0	4	4
	10	0	5	5

Financial Performance | 1.5

The financial statements of the company for the fiscal year that ended on December 31, 2019 have been prepared in accordance with the International Financial Reporting Standards (IFRS). All published financial data of the company is presented in the Annual Financial Statements of 2019.

Net sales (in th. €) (31/12)

	2019 IFRS	2018 IFRS	2017 IFRS
Exploitation segment of Ionia Odos – A.Th.E. Motorway.	134,901.98	127,322.32	96,609.22
Construction segment of Ionia Odos Motorway	CONSTRUCTION COMPLETION	3,871.15	139,547.60
Total	134,901.98	131,193.46	236,156.82

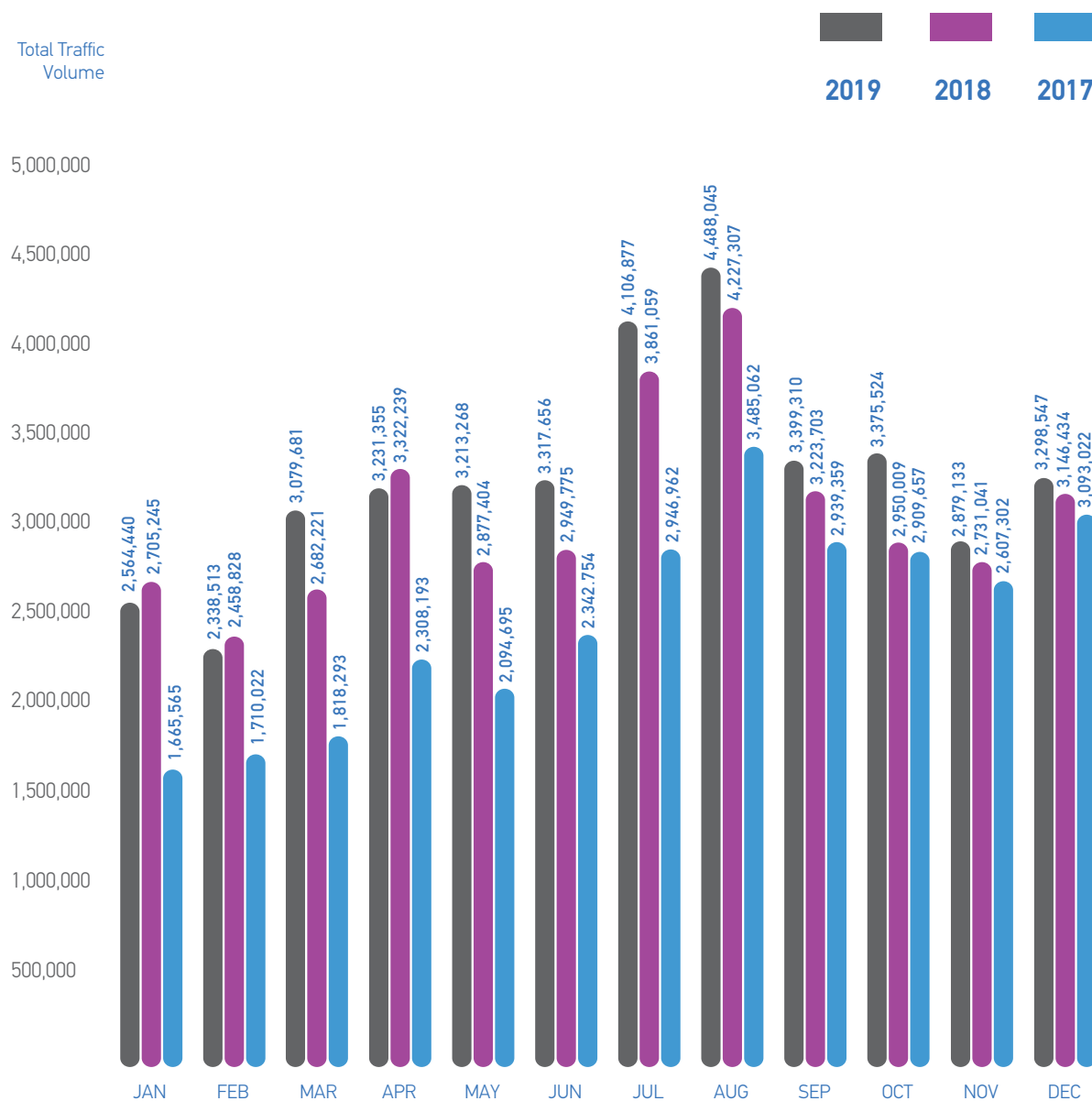
Financial Information (in th. €)	2019 IFRS	2018 IFRS	2017 IFRS
Net Sales	134,901.98	131,193.46	236,156.82
Other operating income	22,583.71	12,199.95	15,669.85
Revenue from financial investments	574.70	1,134.07	2,419.05
Total income	158,060.40	144,527.49	254,245.72
Operating cost	60,680.05	62,601.17	189,859.08
Employee salaries and benefits	9,937.03	12,119.37	8,906.90
Payments to providers of capital	25,597.16	33,275.28	8,488.48
Net profit / (loss) before taxes	26,933.01	20,500.65	1,453.13
Net profit / (loss) after taxes	26,038.78	15,139.89	6,766.47
Total payments to state bodies (taxes paid)	19,958.56	12,912.93	10,008.56
Company investments	10,795.88	16,120.19	144,975.83
Total capitalisation	463,120.39	472,068.91	532,786.47
Equity	197,730.93	257,784.45	242,162.41
Total liabilities	339,626.61	301,250.23	400,785.70
Total assets (in million €)	537,357.55	559,034.68	642,948.11



Increase of total entries compared to 2018










	2019			2018			2017
Total vehicle entries and Electronic Toll Collection system (ETC)	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Total vehicle entries	39,292,349	28,975,056	10,317,293	37,135,255	27,195,624	9,939,631	29,910,886
Number of non-exempted electronic transactions performed in Nea Odos' Toll Stations (ETC)	8,980,044	7,505,943	1,474,101	7,299,833	6,104,591	1,195,242	5,189,455
Percentage	22.9%	25.9%	14.3%	19.7%	22.4%	12.0%	17.3%

3 Year traffic Volume Evolution for Nea Odos





2019

Entries by Vehicle Category	Total for NEA ODOS	A.Th.E.	IONIA ODOS
Category 1 	288,974	209,058	79,916
Category 2   	31,984,944	23,283,869	8,701,075
Category 3   	3,331,712	2,615,386	716,326
Category 4  	3,686,719	2,866,743	819,976



1.6 | Business Ethics and Responsible Operation

Nea Odos has a key priority in complying with the provisions of the existing legislation regarding environmental, social, employment and operational issues and thus follows all relevant regulations and is strictly in line with the Greek and European legislations. To this end, the company is systematically kept informed of the content of its legal and institutional obligations in order to respond effectively and timely to the emerging commitments and comply to the best of its abilities to the moral standards and responds to social expectations. Nea Odos also follows best practices with respect to its vision, mission and founding values, exceeding its formal obligations in many cases.

Our values, which focus on efficiency and effectiveness, on responsibility, on the strength of our people and on integrity, allow us to offer the highest levels of road safety combined with the highest ever quality of services.

During the reference period, there were:

- no corruption incidents or no termination of a cooperation agreements due to corruption-related offenses
- no recorded issues of environmental degradation caused by the operation and maintenance of the motorways and there was no penalty payment or other sanction for breach of the environmental legislation
- no incidents of non-compliance with the laws or regulations regarding the safety of drivers
- no cases of non-compliance in the departments of communications, marketing, advertising and sponsorships
- no corruption incidents and no termination of a cooperation agreements due to corruption-related offenses

1.7 | International Standards and Certifications

Nea Odos is committed to the quality of its services while aiming at the continuous improvement of its performance. The company has developed and implements a common Integrated Management System which resulted from the integration of the Quality, Environment and Safety & Health Management Systems. The goal of the Integrated Management System is the most effective management of quality, environment, safety and health issues through the elimination of overlapping procedures and controls. In addition, Nea Odos designed and implemented a Road Safety Management System which was certified according to the ISO 39001: 2012 international standard, making Nea Odos the first, second-generation concessionaire to receive the relevant certification. This certification is a milestone in the safe and effective fleet management of the company while proving its commitment to the implementation of safe practices in the motorways.

Certifications

Quality	Road Safety	Environment	Health and Safety
Quality Management System ISO 9001:2015	Road Traffic Safety (RTS) Management System ISO 39001:2012	Environmental Management System ISO 14001:2015	Occupational Health and Safety System OHSAS 18001:2007





2.1 | Distinctions

Hellenic Responsible Business Awards 2019

“Long-Term Local/Regional Investment”

Nea Odos earned the Bronze Award in the “Long-term Local/Regional Investment” category for the “Cycling Safely” action, implemented in collaboration with the “Panos Mylonas” Hellenic Road Safety Institute. “Cycling Safely” has been implemented since 2014 and contributes to shaping the road culture and behaviour of children and aims at enabling children adopting a responsible driving behaviour. Approved by the Greek Ministry of Education and the Institute for Educational Policy, it is implemented with the cooperation of the competent Departments of Primary Education.

“Short-Term Local/Regional Investment”

Nea Odos earned the Silver Award in the “Short-term Local/Regional Investment” category and won the only award in this category. This distinction concerns the training of 265 police officers of all levels from the regions of Akarnania, Aetolia, Arta, Preveza, Ioannina, Evia, Viotia and Fokida, in identifying and managing incidents of child abuse. The action is carried out in cooperation with the ELIZA association against child abuse, as part of a national initiative implemented in cooperation with the Hellenic Police.

Award from the Hellenic Paralympic Committee

Nea Odos was awarded an honorary distinction from the Hellenic Paralympic Committee - in the context of a special event - for the supporting athletes with disabilities efforts during the last 3 years. On the occasion of the celebration of the International Day of Persons with Disabilities, the Hellenic Paralympic Committee and the National Sports Federation of Persons with Disabilities organized a ceremony for the distinguished athletes and coaches for 2019, as well as the refugee program athletes. In addition, they awarded the sponsoring companies that consistently support the work of the Commission, which concerns the development and dissemination of the Paralympic Movement in Greece as well as the selection and formation of national teams at the Paralympic Games.

Participation in Bodies, Partnerships and Initiatives | 2.2



The Nea Odos participation in national initiatives, local partnerships and long-term synergies is an integral part of its Corporate Responsibility. From the first day of its operation, it actively participates and supports:

- the Observatory of Road Networks in Western Greece and Peloponnese (POADEP)
- the "HELLENIC ASSOCIATION of TOLL ROAD NETWORK" with the distinctive title "HELLASTRON"
- the Hellenic Institute for Customer Service
- the "Panos Mylonas" Road Safety Institute
- the "Diazoma" association

It is worth mentioning here that Nea Odos has entered into a strategic partnership in the field of roadside assistance with Interamerican to support drivers driving through the motorways it maintains, operates and manages. The agreement concerns the project of towing and removing vehicles of all types - light, heavy, two-wheelers, etc. - that are immobilized due to damage or accident. In 2019 this cooperation expanded with the design and implementation of joint information and awareness initiatives for road safety.

Participation in Conferences

In 2019, we participated in conferences on road safety, motorway management and Corporate Responsibility, the most important being:

ASECAP Days 2019

- "Road safety for fleet management through an innovative driver behaviour monitoring system", Anastasia Pneumatikou, Senior Traffic & Transport Engineer,
- "Maintenance of critical electromechanical systems", Pavlos Karanatsis, Electromechanical Systems Maintenance Manager,
- "A complete infrastructure maintenance program in Nea Odos SA", Asterios Simopoulos, Head of Construction,
- "Cooperation with the police authorities for the reduction of toll violations in Nea Odos", Maria Politou, TCS, Backoffice & Reporting Team Leader,
- "IONIA ODOS: Transforming an area from the local road network into a modern motorway", Eugenia Soufi, Traffic Management Manager.

Corporate Responsibility in Practice" Conference

"Nea Odos - ELIZA: We pave the way AGAINST child abuse", Gerasimos Monokrousos, Head of P.R., Marketing & C.S.R.

Evening Event of the Hellenic Committee for Tunnels & Underground Works

"Development and commissioning of a new SCADA in tunnels in circulation", Konstantinos Faidas, Chief Technical Officer and Ioannis Sioutis, Senior E/M Project Engineer & Tunnel Safety Officer.

Two-day conference of the Hellenic Organization of Intelligent Transport Systems

"The technological present and future of Greek motorways", Konstantinos Faidas, Chief Technical Officer and Ioannis Sioutis, Senior E/M Project Engineer & Tunnel Safety Officer.

Presentations in workshops

- National Technical University of Athens: "Digitization and Road Safety", Anastasia Pneumatikou, Senior Traffic & Transport Engineer,
- PANOPTIS European Initiative: "Needs and requirements of officials to increase the durability of road bridges and earthworks", Asterios Simopoulos, Head of Construction.

Studies

- «Minimizing lighting consumption in existing tunnels using a no-cost fine-tuning method for switching lighting stages according revised luminance levels» at the Institute of Electrical and Electronics Engineers, Konstantinos Faidas, Chief Technical Officer and Ioannis Sioutis, Senior E/M Project Engineer & Tunnel Safety Officer,
- «A decision support system for assessment of street lighting tenders based on energy performance indicators and environmental criteria: Overview, methodology and case study» in the ELSEVIER's international journal «Sustainable Cities and Society», Konstantinos Faidas, Chief Technical Officer and Ioannis Sioutis, Senior E/M Project Engineer & Tunnel Safety Officer.

Associations and Organizations that Nea Odos is a member of

	Holds a place in the governing body	Participates in projects or committees	Provides significant funding beyond the regular subscription	Considers its involvement as a strategic priority
"HELLENIC ASSOCIATION of TOLL ROAD NETWORK" with the distinctive title "HELLASTRON"	✓	✓	✓	✓
Observatory of Road Networks in Western Greece and Peloponnese (POADEP)		✓	✓	✓
Hellenic Institute for Customer Service	✓			✓
"Panos Mylonas" Road Safety Institute	✓	✓	✓	✓
"Diazoma" Association	✓	✓	✓	✓

Connection to the Sustainable Development Goals and Goal Setting



17. PARTNERSHIPS FOR THE GOALS



16. PEACE, JUSTICE AND STRONG INSTITUTIONS



16. PEACE, JUSTICE AND STRONG INSTITUTIONS

GRI 102-12, GRI 103-2

Topic	2019 Goal	2019 Progress	2020 Goal
Participation in Global Initiatives	Integrate global initiatives in company programs	Integrate global initiatives in company programs	Improve the communication of the priorities of Nea Odos
Reinforcement of internal structures	Adopt the Corporate Governance Code of GEK TERNA GROUP	Complete the adoption process of the Corporate Governance Code of GEK TERNA GROUP	Strengthening the Corporate Responsibility Team by hiring a full-time employee (jointly with Kentriki Odos)
Annual Recertification	Annual Recertification: ISO 9001:2015	Completed	Annual Recertification:ISO9001



3

CORPORATE RESPONSIBILITY

3.1 | Our Approach

The motorways we have built, maintain and operate are a public good. We are called upon to manage this good with absolute responsibility and strategic planning, which takes into account technology developments, improved road infrastructure, innovative driver services and many other parameters so that this caters to the development and protection policies of the local and the wider communities. In this context, Corporate Responsibility is an important governance tool for us and the way it is managed reflects our philosophy, mission and our corporate values.

In order to immediately respond to the needs of Greek society and the local communities adjacent to the motorways that Nea Odos is responsible for, we have created a strategic framework for Corporate Responsibility that follows internationally recognized practices and is based on five pillars:

1. Road Safety: Continuous improvement of road safety
2. Quality of Rendered Services: To be the best possible travel companion
3. Human Resources: Talent development
4. Environment: Contribution to the protection of the environment
5. Cooperation with the Local Communities – Social Contribution: Support and development of the neighbouring local communities

Corporate Responsibility Pillars






Our Values

Efficiency and effectiveness, Responsibility, The strength of our people, Integrity

Corporate Governance

Zero corruption, Transparency, Ethical governance

Focus areas by pillar

Road Safety	Quality in Services	Human Resources	Caring for the environment	Cooperation with Local Communities and Social Contribution
				
Safety of drivers Suitability of signage Technology	Financial performance/ market presence Suppliers environmental assessment Interoperability Toll rates Private data protection Electromobility	Employment Meritocratic recruitment procedures Training and education Development and performance management Equal opportunities and diversity Non-discrimination Occupational Health and Safety	Fuel consumption Energy consumption Effluents and waste Noise management Emissions Biodiversity Environmental compliance Accidental pollution	Indirect economic impacts Presence in the local community Supporting local initiatives

Handling Corporate Responsibility Issues | 3.2

The management of the issues pertaining to Corporate Responsibility requires a multi-faceted and complex process that requires a systematic approach and active participation of all divisions of the company. To this end, the Corporate Responsibility Team, which consists of executives from all the company's main departments, is responsible for the following:

- the collection of data required for the annual Corporate Responsibility Report
- ensuring the quality and reliability of data and information collected
- the development of Corporate Responsibility policies and procedures
- the briefing of employees about new policies and procedures and the implementation of initiatives that enhance Corporate Responsibility culture

The Public Relations & Marketing Division is responsible for coordinating and managing Corporate Responsibility issues and:

- informs top management at regular intervals
- recommends the necessary procedures for managing Corporate Responsibility initiatives and initiatives
- proposes and implements the strategic direction of the company
- coordinates and is the leader in preparing the Annual Corporate Responsibility Report

Stakeholders | 3.3

In 2018, in the context of our effort to strengthen our cooperation with our stakeholders, we placed particular emphasis on the process of in-depth mapping of all parties, understanding and mapping the material topics that concern and affect them. From this process, a series of topics and actions emerged on which we focused in 2019 aiming at the formulation of specific internal processes that will improve the way we evaluate the proposals of our stakeholders and how we integrate them into our strategy and performance management system.

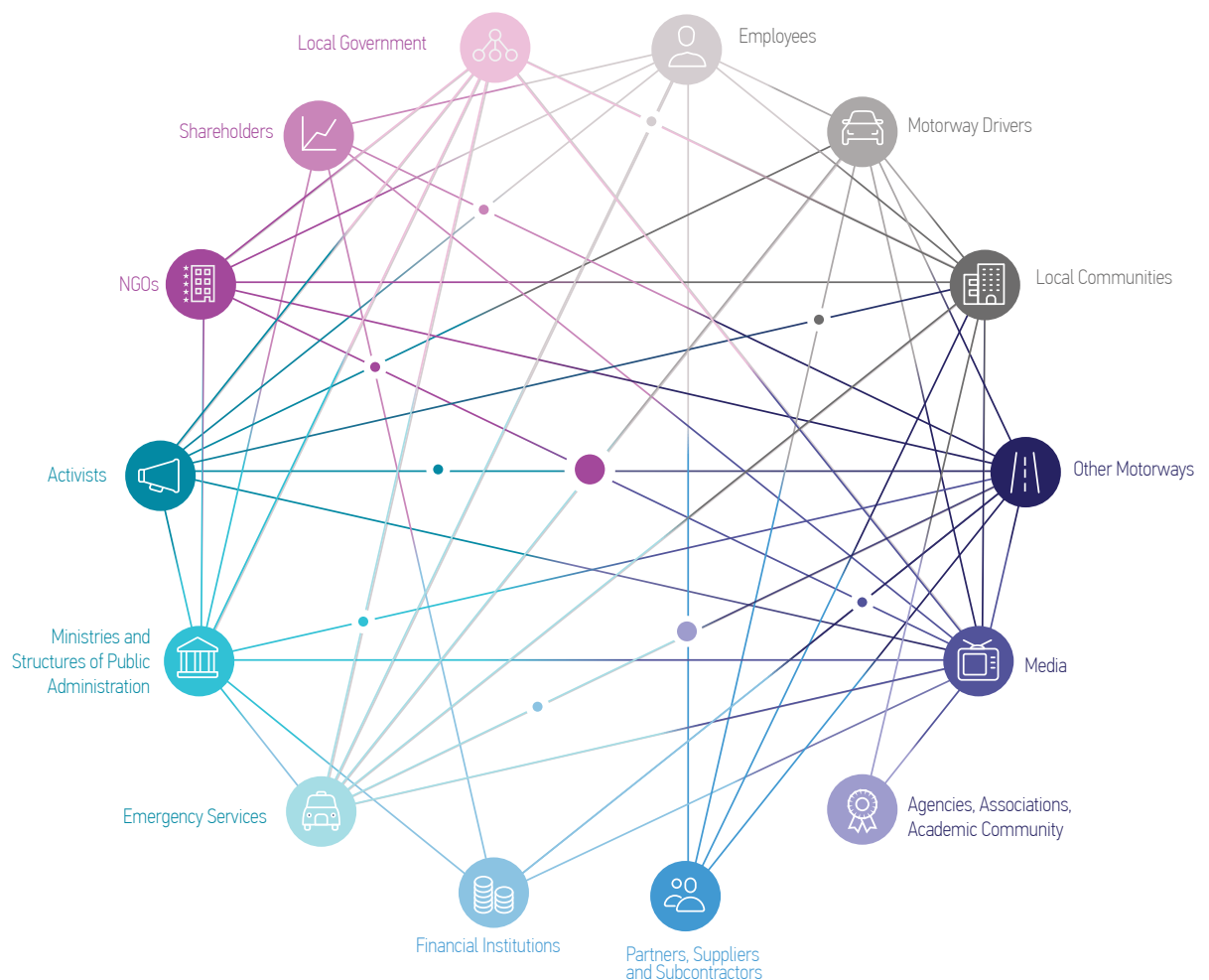
The ways in which we communicate with our key stakeholders as well as the main issues of interest are analysed in the following table.



Direct stakeholders	Expectations/Main issues	Communication Mechanisms	Communication Frequency	Communication Outcomes
Employees	<p>Regular communication between Employees – management</p> <p>Informing employees about organizational changes and anything related to the company</p> <p>Emphasis on Health and Safety issues</p> <p>Rewards, additional benefits and remuneration system</p> <p>Respect, equality and meritocracy</p> <p>Training, evaluation and development opportunities</p> <p>Respect for personal and family life</p> <p>Retain a positive company profile</p>	<p>Meetings between employees and management representatives</p> <p>Email correspondence</p> <p>Newsletters</p> <p>HR Department</p> <p>Open door policy</p> <p>Personal communication</p> <p>Commitment and satisfaction survey</p> <p>Corporate Responsibility Report</p>	Continuous communication	<p>Improvement of employees' development process through the establishment of Development Centres</p> <p>Initiatives for the improvement of the working environment, boost confidence amongst employees and enhance a sense of active participation</p> <p>Strengthen employee commitment</p> <p>Better dissemination of information, understanding the purpose of change</p> <p>Recognise the company as a fair employer</p> <p>Increase efficiency</p> <p>Reduction of leaves</p>
Motorway Drivers	<p>Safe and fast travel</p> <p>Infrastructure quality, quality of service, satisfaction and reliability</p> <p>Immediate response to incidents</p> <p>Immediate response to requests or complaints</p> <p>Immediate dissemination of information</p> <p>Private data protection</p> <p>Interoperability</p> <p>Upgrade commercial policy and rewards for frequent users</p> <p>New and innovative payment methods</p> <p>Toll rates, discount policy</p>	<p>Customer service department</p> <p>Customer satisfaction surveys</p> <p>Complaint handling department</p> <p>Awareness campaigns</p> <p>Company website</p> <p>Emergency number</p> <p>Variable Message Signs (VMS)</p> <p>Press Releases</p> <p>Employees at toll stations</p> <p>Media</p> <p>Corporate Responsibility Report</p> <p>Email / contact forms</p> <p>Road Side Surveys (RSS)</p>	Daily	<p>Road network interventions and infrastructure improvement initiatives</p> <p>Improvement of signage</p> <p>Good publicity and reputation</p> <p>Extending social consensus with the company's objectives</p> <p>Stabilization of safety feeling in the motorway</p> <p>Discount programs</p> <p>Better understanding of future issues that may arise including possible increase of fares</p> <p>Understanding the role of the company and satisfaction with the provided services</p> <p>Ideas and suggestions</p>
Local Communities	<p>Stimulate the local economy, create jobs and develop the wider region</p> <p>Indirect positive financial effects</p> <p>Improve standard of living</p> <p>Recruitment from local communities</p> <p>Sponsorships - charity initiatives and social investments</p> <p>Respect and protection of local environmental wealth</p> <p>Retain high level of service</p>	<p>Meetings with representatives of local communities</p> <p>Consultation with local associations and bodies of residents</p> <p>Local media</p>	On regular time intervals/ Daily	<p>More targeted support for the local economy</p> <p>Smooth cohabitation</p> <p>Increase local business revenue</p> <p>Attractive working environment and enhanced Nea Odos' image as an employer</p>
Local Government	<p>Comprehensive information regarding impacts from the company's operation on a local level</p> <p>Accountability and taking measures where necessary</p> <p>Strengthen local agents' and local government's initiatives</p>	Direct communication with administrative structures at local level	On regular time intervals	Collaboration for voluntary initiatives
Shareholders	<p>Financial performance, efficiency, dividend distribution</p> <p>Regular and correct information/ reporting</p> <p>Effective governance mechanisms</p> <p>Leadership in the industry and positive reputation</p> <p>Provide high quality services and develop innovations</p> <p>Develop partnerships</p>	<p>Board of Directors meetings and General Assemblies</p> <p>Regular reporting</p> <p>Company website</p> <p>Balance Sheets and Financial Statements</p> <p>Corporate Responsibility Report</p> <p>Correspondence and business</p>	On regular time intervals	<p>Detailed recording of the environmental and social impacts of company's operation and their disclosure through the Corporate Responsibility Report</p> <p>Adopt new practices, better resource management and improved crisis response</p>

Direct stakeholders	Expectations/Main issues	Communication Mechanisms	Communication Frequency	Communication Outcomes
NGOs	Support NGOs goals Economic support Public awareness	Company website Department of Public Relations Corporate Responsibility Report	On regular time intervals	Develop joint awareness campaigns Strengthen the social profile of the company Link business operation with social causes
Activists	Reduction of toll rates which are not subject to corporate decisions	According to company policies	When deemed necessary	Interventions where possible to ensure smooth driver service
Ministries and Structures of Public Administration	Good operation of the motorway Fully inform the supervisory authority on matters relating to the operation of the infrastructure. Compliance with the contractual obligations set out in the Concession Agreement Environmental performance Optimal management of road safety and zero accidents Extension of contracts / additional works Create new jobs Effective communication and cooperation	Correspondence, phone communication and work meetings Workshops / Representative meetings Official reports Visits, inspections Corporate Responsibility Report	On regular time intervals/ Daily	Fulfilment of the obligations arising from the Concession Agreement Improve management and operation practices, risk prevention and crisis management Maintaining good relations
Emergency Services	Compliance with laws Support to Emergency Services work (Traffic Police, Ambulances, Fire Department, Civil Protection etc.) Effective communication and cooperation Technical equipment	Scheduled and unscheduled meetings with Emergency Services representatives Correspondence, phone communication and work meetings	Daily	Intensification of readiness exercises Effective incident / crisis management Smooth cooperation Excellent traffic conditions 24 hours a day, 365 days a year
Financial Institutions	Comprehensive information on company performance Financial effectiveness Consistency in its financial obligations and timely payment of interest and loans Compliance with legislative framework, contractual obligations, fair governance and financial audits Risk management and company growth prospects Budget keeping Access to information Positive publicity for a funded project	Correspondence, phone communication and work meetings 3 and 6-month reports Official reports Corporate Responsibility Report	On regular time intervals	Full compliance with the law Analysis of social and environmental risks Project financing / disbursement Payment of suppliers Positive publicity Timely resolution of issues
Partners, Suppliers and Subcontractors	Transparency in procurements and in governance mechanisms Meritocracy in selecting suppliers and partners Compliance with agreed partnership terms Effective communication Responsible supplies Flexibility and availability Experience	Procurement department Ongoing communication with partners in the implementation of projects Correspondence, phone communication and work meetings	On regular time intervals/ Daily	Keeping terms and deadlines Application of supplies' manuals Immediate response to requests Improving relationships, quality and cooperation

Direct stakeholders	Expectations/Main issues	Communication Mechanisms	Communication Frequency	Communication Outcomes
Agencies, Associations, Academic Community	Exchange of knowledge on issues of industry expertise	Participation in conferences and seminars	On regular time intervals	Re-evaluation and upgrade of practices
Media	Clear strategies and structured relationships with journalists and the Media Continuous updates and exclusive tributes Advertising budget	Department of Public Relations / Marketing Correspondence, phone communication Interviews / interventions Online press releases Personal communication Social media and video-sharing platforms	On regular time intervals/ Daily	Communicate company's activities to the general public Positive publicity Fair distribution of advertising budget Zero news leaks Continuous updates
Other Motorways	Optimal coordination in interchange areas Collaborate, share knowledge and tackle industry's issues Adopt best practices for managing, risks and opportunities Interoperability Healthy competition Promote industry issues	Mail correspondence Contact via phone HELLASTRON meetings	On regular time intervals	Completion of actions related to the operation of motorways Adopt common practices and exchange of know-how and information Effective management of road safety issues with emphasis on prevention



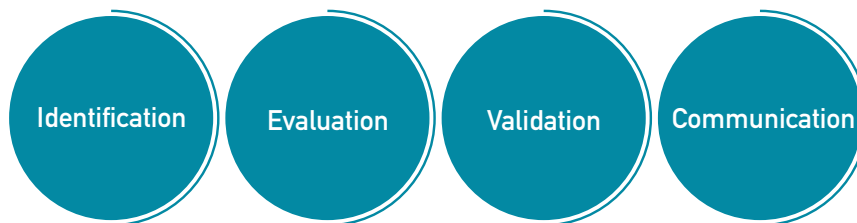
The content of this Corporate Responsibility Report has been determined through an internal confirmation process of material topics for both the company and our stakeholders. This content is based on the results of the process, as it was implemented in 2018.

During 2019, a series of surveys exclusively for our infrastructure users was completed and/or carried out, part of which focused on purely Corporate Responsibility issues. The results of the surveys have been included in the respective chapters of this Report. As a result of these surveys, a new important topic entitled "Electromobility" was added to the "Quality in Services" Pillar. In addition, we decided to reorganize the topics as they are presented in the "Cooperation with Local Communities and Social Contribution" Pillar and to now include "Support to Local Initiatives" as an autonomous material topic.

Main process to identify material topics:

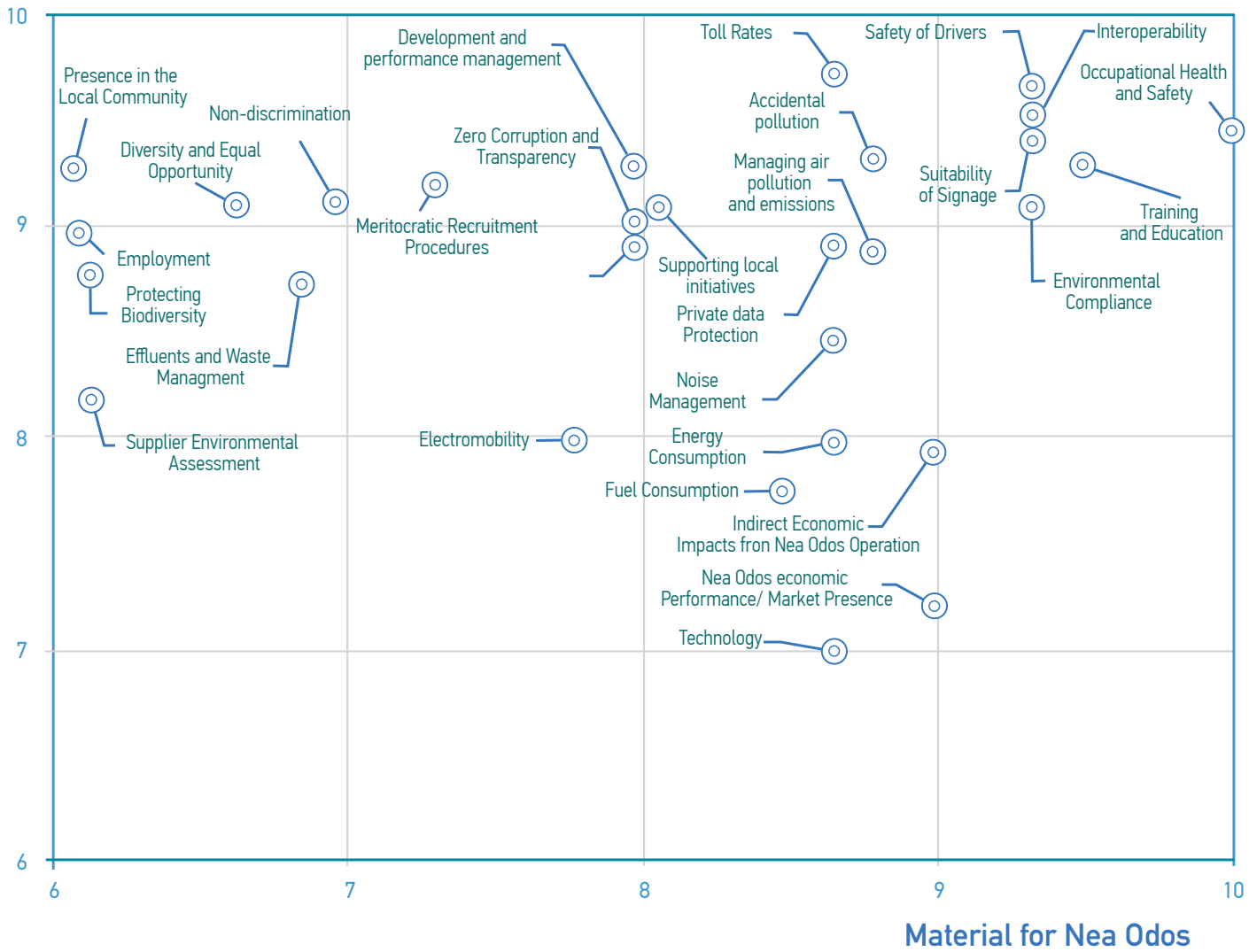
1. Identification of material topics based on their impact on the company's business operations, and defining their impact boundaries
2. an assessment based on the importance of their impact both on the company and their impact on the evaluations and decisions of the stakeholders
3. validation as to their completeness so that the content of the Report reflects the company's significant economic, environmental and social impacts in order to allow stakeholders to assess its performance and make decision-making easier
4. communicating the Corporate Responsibility Report to all stakeholders.

The material topics that form the core content of the 2019 Corporate Responsibility Report are presented in the following matrix.



Materiality Matrix

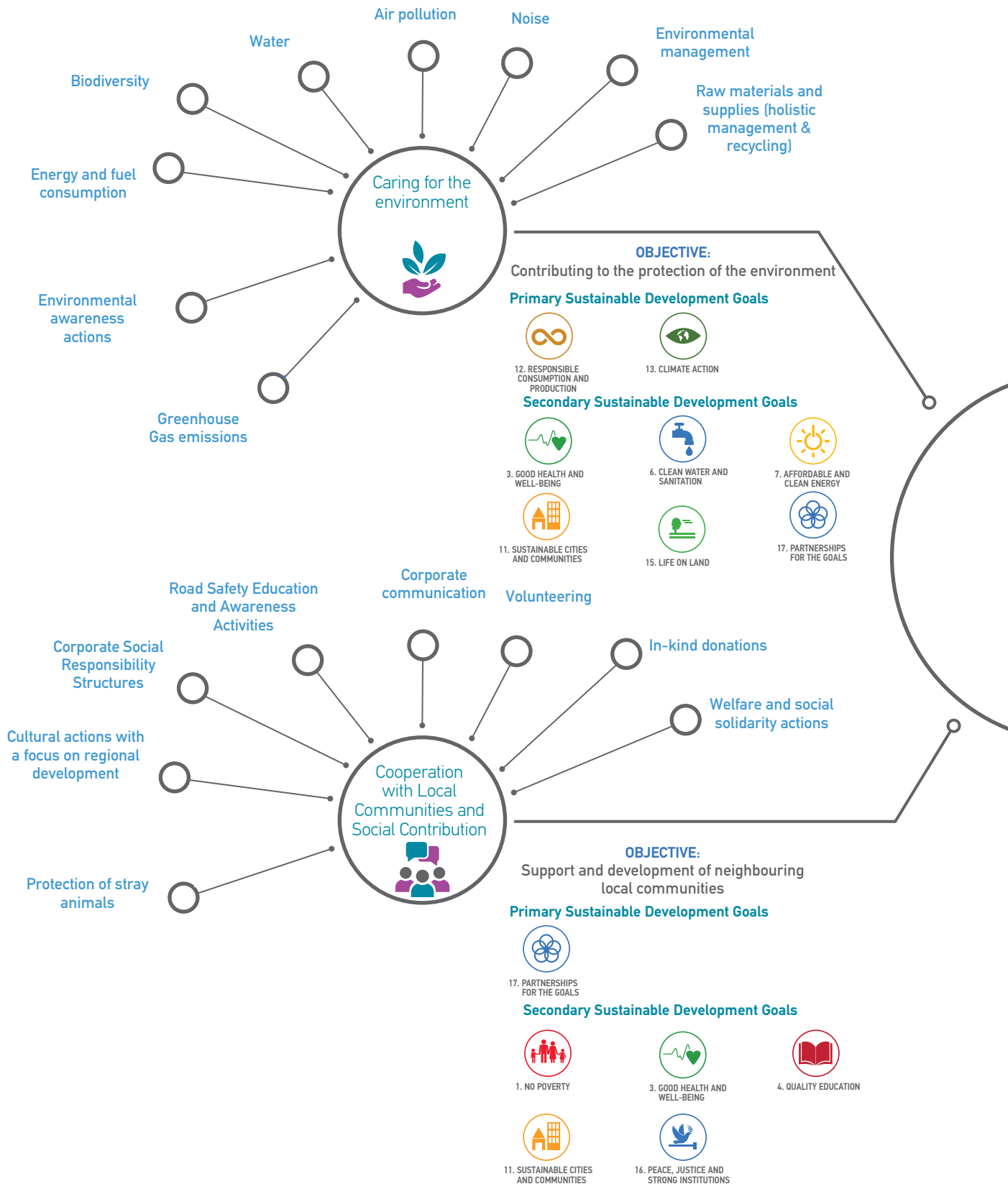
Material for Stakeholders

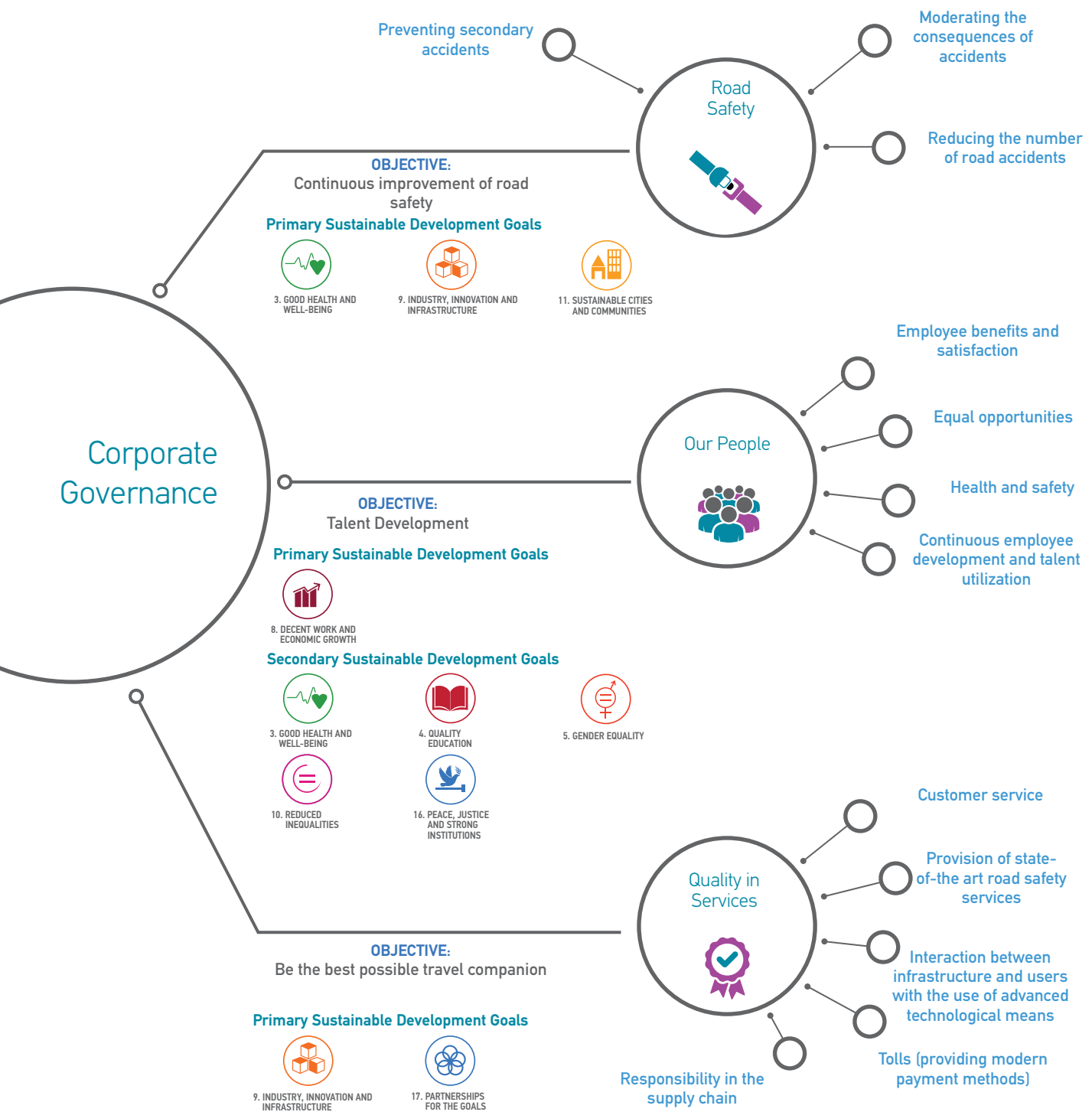


Nea Odos Corporate Responsibility Material topics	Direct Stakeholders											Indirect Stakeholders			Boundary of material topics		SDGs
	Employees	Motorway Drivers	Local Government Bodies	Shareholders	Ministries and Public Administration Structures	Emergency services	Financial Institutions	Partners, Suppliers and Subcontractors	NGOs	Activists/ Lobbies	Local Communities	Institutions, Associations, University Community	Media	Other Motorways	Inside Nea Odos	Outside Nea Odos	
CORPORATE GOVERNANCE																	
Zero corruption and transparency	■	■	■	■	■	■	■	■	■	■	■	■	■	■	●		Primary 16, 17
Ethical governance	■			■	■		■	■		■		■	■		●	●	
ROAD SAFETY																	
Safety of drivers	■	■	■	■	■	■	■	■	■	■	■	■	■	■	●		Primary 3, 9, 11
Suitability of signage	■	■	■	■	■	■		■	■	■	■	■	■	■	●		
Technology	■	■		■		■	■	■				■	■	■	●	●	Secondary 17
QUALITY IN SERVICES																	
Financial performance/ market presence	■		■	■	■		■	■	■	■	■	■	■	■	●		Primary 9, 17
Suppliers environmental assessment	■		■	■				■				■		■	●		
Interoperability		■			■		■	■		■			■		●	●	
Toll rates		■		■	■		■			■	■		■	■	●	●	
Private data protection	■	■	■		■	■			■	■	■	■			●	●	
Electromobility		■	■	■	■			■	■		■		■	■	●	●	
HUMAN RESOURCES																	
Employment	■	■		■	■		■			■	■		■		●		Primary 8 Secondary 10, 16, 5, 4, 3
Meritocratic recruitment procedures	■	■	■		■				■				■		●		
Training and education	■	■	■			■		■				■		■	●		
Development and performance management	■	■		■								■		■	●		
Equal opportunities and diversity	■	■		■	■					■	■	■			●		
Non-discrimination	■	■			■					■	■	■		■	●		
Occupational Health and Safety	■	■	■	■	■	■		■	■	■	■	■		■	●		
ENVIRONMENT																	
Fuel consumption	■	■		■	■		■	■	■				■		●		Primary 12, 13 Secondary 17, 7, 15, 11, 3, 6
Energy consumption	■	■	■	■	■		■	■	■	■		■	■		●		
Effluents and waste	■	■	■		■			■	■	■	■	■	■	■	●	●	
Noise management	■	■	■	■	■				■		■	■	■	■	●		
Emissions	■	■		■	■	■		■	■	■	■	■	■	■	●		
Biodiversity	■	■	■		■				■		■		■		●		
Environmental compliance	■	■	■	■	■	■	■		■	■	■	■	■	■	●	●	
Accidental pollution	■		■	■	■	■		■	■	■	■	■			●	●	
SOCIETY																	
Indirect economic impacts	■	■	■		■		■		■	■	■	■			●	●	Primary 17 Secondary 1, 11, 3, 4, 16
Presence in the local community	■		■	■	■				■	■		■			●	●	
Supporting local initiatives	■		■		■				■	■	■	■			●	●	



3.5 | Integrating International Initiatives in Our Strategy





Global Reporting Initiative (GRI)

We support the International Organization Global Reporting Initiative whose guidelines for the preparation of Corporate Responsibility Reports we have adopted and implemented since 2014, in order to depict and communicate our corporate approach to Sustainability in a reliable, structured and comparable way. The GRI Standards, the standard we have adopted from the 2016 Report onwards, allows us to incorporate other international initiatives as well as best practices to depict and communicate our strategy, priorities and practices regarding Corporate Responsibility.

Sustainable Development Goals (SDGs)

Nea Odos has aligned its strategy with the 17 UN Sustainable Development Goals (SDGs). These goals are an important reference framework for prioritizing our priorities and recognizing the degree to which these issues affect our operation and business activities. Since 2017, we have linked our corporate goals with the Sustainable Development Goals, identifying, out of a total of 17 Goals, the 9 key ones that Nea Odos recognizes as important for the company and in the achievement of which it can assist.



Connection to the Sustainable Development Goals and Goal Setting



Topic	2019 Goal	2019 Progress	2020 Goal
Stakeholder Engagement	Implementation of users' recommendations as captured in the motorway user survey on Corporate Responsibility Repeat the survey in 2019	Design and run the campaign "Proodos" Include CSR topics within the Nea Odos Subscriber Habits & Attitudes Survey	Implement recommendations from the "Proodos" campaign Utilise input from the Nea Odos Subscriber Habits & Attitudes Survey
	Launch of online CSR scorecard	Launch of online CSR scorecard	Launch and update content
Employee training on Corporate responsibility and Sustainability	Design a training course for implementation in 2019	Moved to 2020	Design a training course for implementation in 2020



Primary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING

3.6 By 2020, halve the number of global deaths and injuries from road traffic accidents.



9. INDUSTRY, INNOVATION
AND INFRASTRUCTURE

9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.



11. SUSTAINABLE CITIES
AND COMMUNITIES

11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.



17. PARTNERSHIPS FOR THE GOALS

Secondary Sustainable Development Goals

In 2019, Nea Odos dedicated:

251,093 hours
to road maintenance

41,501 hours
to road infrastructure inspections

54,940 hours
to snow removal

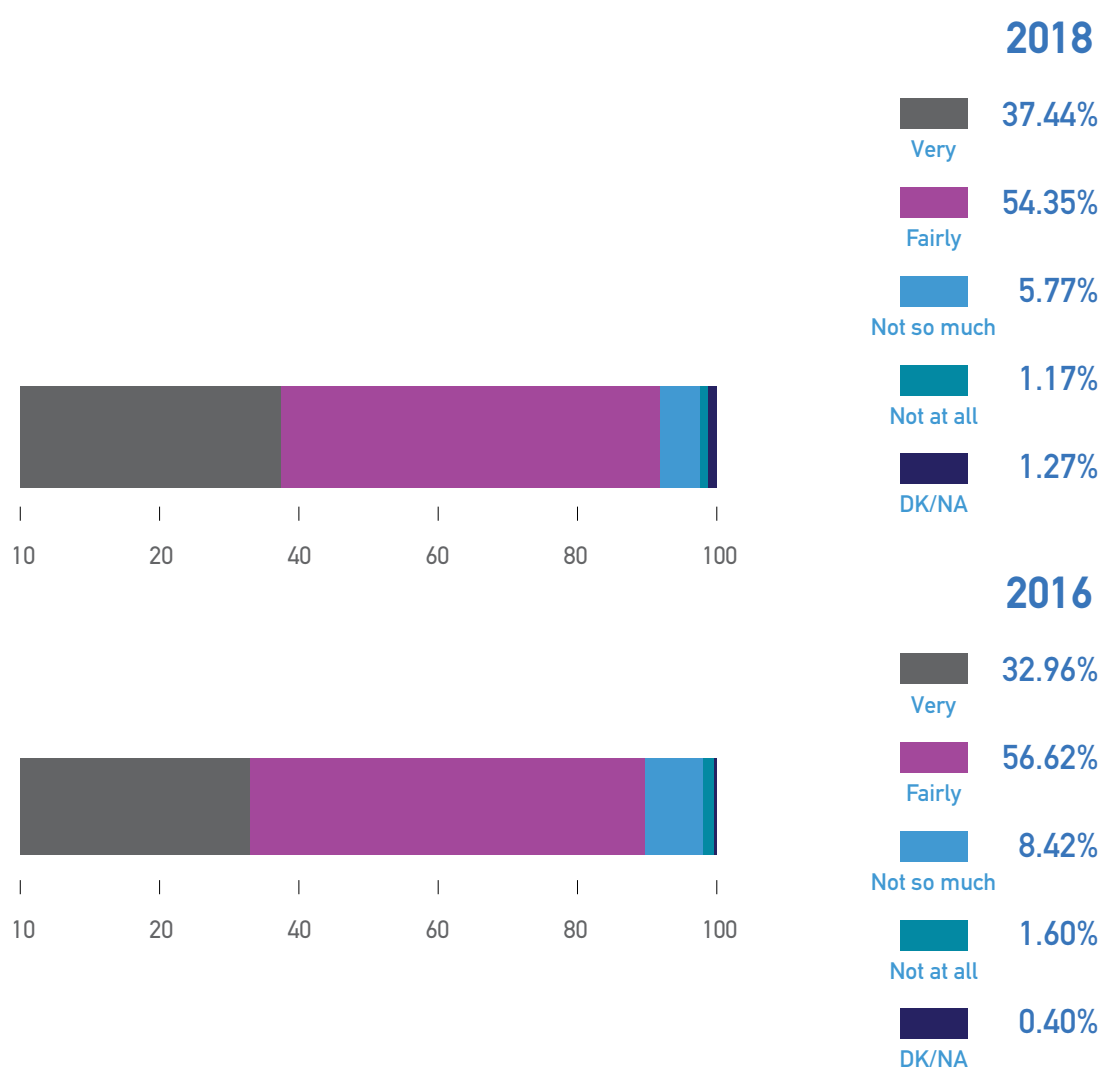
Nea Odos focuses on addressing the biggest challenges in the field of road safety, such as infrastructure safety, prompt and effective incident management and the provision of a wide range of services to drivers.

The high specifications of the construction focus on the geometric design, the traffic studies and the safety marking studies in order to respond effectively to the geotechnical challenges, the special geological conditions and the reliefs of each area.

It is our responsibility to keep the motorways safe and to protect human lives as much as possible.

Nea Odos is committed to implementing the highest road safety standards as recorded in the company's Road Safety Policy.

How safe would you say you feel when driving on Nea Odos?



Nea Odos Subscriber Habits & Attitudes Survey
(November-December 2018)

4.1 | Our Priorities

To provide the highest possible level of road safety, the company is fully in line with the Greek and European legislations, covers its obligations under the Concession Agreement to the fullest and adopts best practices and technological innovations according to announcements of the European Commission and other recognized bodies.

With a sense of responsibility, it undertakes specific initiatives aimed at **the safe movement of each driver and the elimination of accidents, giving priority to three central areas:**

1. reduction of the number of road accidents
2. reduction of the impact of road accidents
3. taking measures to prevent secondary accidents

4.2 | Signage and Infrastructure

Signage

The role of signage in creating and continuously improving a high safety road environment is paramount. In a modern, safe motorway like the one we operate, the signage studies are fully harmonized with the national and European legislation, approved by the Independent Engineer (certification number DAC0596B) and are implemented diligently.

Signage categories

- Emergency signage
- Mobile signage
- Short-term works signage
- Long-term works signage

In all cases of traffic signage, either in the context of construction work or in the context of maintenance or traffic diversion, special provisions are implemented for protecting human lives and for the safe use of the motorway. In particular, in its daily preventive technical inspections, Nea Odos places special emphasis on monitoring signage and immediately intervenes where deemed necessary. It has to be noted that the emergency signage that update drivers about important incidents, diversions, etc., contribute greatly to updating drivers on the conditions prevailing on motorways.

	A.Th.E.			IONIA ODOS		
Variable Message Signs (VMS)	2019	2018	2017	2019	2018	2017
Number of Variable Message Signs (VMS)	32	32 *	18	36	36 *	26

* Revision of 2018 data, as in the Report of 2018 the values did not include the exact number of signs.

The maintenance and management of the motorways that fall under our responsibility is the top priority of the technical department and is crucial for road safety and customer service.

Nea Odos prepares and follows an integrated maintenance program based on the Road Infrastructure Management and Maintenance System, which has been developed specifically to

meet the needs of Ionia Odos and the A.Th.E. This system has provisions for mapping the road infrastructure, includes and monitors the behaviour/performance of the road paving and the effectiveness of our interventions, thus contributing to maintaining a high standard of technical works safety.

Types of Infrastructure Maintenance

Preventive maintenance

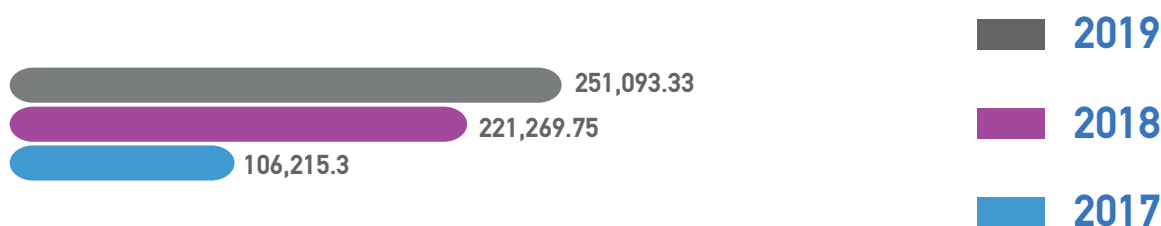
includes pavement restoration work, maintenance of median strips, landscaping works and all technical maintenance, cleaning of the motorway and all maintenance in electromechanical installations, safety and security equipment, irrigation and fire-fighting systems, etc

Improvement maintenance

includes pavement replacement, heavy interventions in engineering projects and building facilities, and modernizing all electromechanical infrastructure and electronic equipment. It also includes the re-designing of intersections, improvements in horizontal and vertical signage, constructions of works (sewerage, irrigation, etc.) in order to avoid accidents, replacement of safety barriers, etc..

Manhours for Road Maintenance							
Road Maintenance by Category	Total NEA ODOS	2019		Total NEA ODOS	2018		Total NEA ODOS
		A.Th.E.	IONIA ODOS		A.Th.E.	IONIA ODOS	
Green Areas and Trees	61,331.37	29,764.12	31,567.25	59,821.25	33,915.15	25,906.10	51,860.5
Cleanliness	46,842.80	26,652.47	20,190.33	57,810.75	37,177.75	20,633	19,966.4
Motorway Drainage System	16,179.87	11,041.35	5,138.52	12,162.03	7,147.12	5,014.92	11,106.3
Road Surface	29,232.50	27,404.00	1,828.50	11,534	10,987	547	6,121.8
Buildings	9,490.50	8,348.50	1,142.00	8,043.31	3,055.31	4,988	4,299.5
Other (material transportation, tidiness, training, etc)	14,512.08	12,658.62	1,853.46	4,840.03	2,808.10	2,031.93	3,649.6
Tunnels, Cut and Cover, Landfills and Trenches	7,501.98	6,810.68	691.30	2,735.50	2,002.98	732.52	3,015.7
Motorway Signage	11,789.99	7,331.27	4,458.72	10,588.42	8,946.78	1,641.63	1,789
Shoulder, Traffic Islands, Kerbs-Gutters and Sidewalks	17,604.15	17,013.47	590.68	2,924.38	2,346.95	577.43	1,652.4
Motorway Safety and Protection Equipment	11,889.80	10,932.15	957.65	6,256.45	5,584.95	671.50	1,495
Common and Special Bridges	448.02	290.02	158	421	318.92	102.08	657.3
Support Walls and Avalanche Retaining Walls	342.33	302.33	40	910.63	836.72	73.92	340.6
Winter Maintenance	23,909	12,568	11,341	43,221	26,045	17,176	253.0
Firefighting	6,95	-	6.95	-	-	-	8,4
Signage Bridges	12	12	-	-	-	-	-
Total	251,093.33	171,128.97	79,964.36	221,268.75	141,172.73	80,096.03	106,215.3

Manhours for Road Maintenance



Electromechanical Equipment Maintenance

	2019	2018	2017
Total maintenance tasks in electromechanical equipment	117	117	117
Total maintenance tasks in electromechanical equipment for tunnels	43	43	43

Restoration of Road Infrastructure

As a result of road inspections and observations by the patrols and the rest of the specialized staff of Nea Odos as well as the drivers, in 2019 the following data was recorded as regards road infrastructure:

A.Th.E.: 2,601 incidents (3,835 incidents in 2018)

Ionian Odos: 2,655 incidents (2,681 incidents in 2018)

Manhours for Infrastructure Inspections per Category

Road Infrastructure per Category	Total NEA ODOS	2019			2018			2017	
		A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS		
Winter Maintenance	31,015	28,839	2,176	16,423.90	9,342	7,081.90	14,147		
Tunnels, Cut and Cover, Landfills and Trenches	777.12	440	337.12	1,941.66	767.93	1,173.73	4,700.4		
Motorway Safety and Protection Equipment	2,445.64	1,003.28	1,442.36	8,332.91	941.57	7,391.34	3,676.3		
Road Surface	1,356.66	1,035.88	320.78	1,263.61	938.43	325.18	2,324.5		
Motorway Drainage System	1,843.36	1,398.38	444.98	864.57	574.75	289.82	1,386.9		
Motorway Signage	1,039.23	512.11	527.12	4,251.65	866.08	3,385.57	1,366.6		
Cleanliness	942	942	-	-	-	-	620		
Common and Special Bridges	296.72	189.72	107	440.48	369.90	70.58	501.2		
Support Walls and Avalanche Retaining Walls	351	260	91	403	304	99	333		
Shoulder, Traffic Islands, Kerbs-Gutters and Sidewalks	1,022.23	910.23	112	360.18	224.50	135.68	244.5		
Buildings	18.50	-	18.50	93	48	45	154		
Green Areas and Trees	138	95	43	136	104	32	100		
Other (material transportation, tidiness, training, etc)	250.50	226.50	24	321	196	125	37		
Signage Bridges	5.46	5.43	0.03	3.84	3.77	0.07	4.8		
Total	41,501.42	35,857.54	5,643.89	34,835.80	14,680.94	20,154.87	29,596.2		

Manhours for Road Infrastructure Repairs

Road Infrastructure per Category	2019			2018			2017
	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Motorway Safety and Protection Equipment	8,094.77	4,646.50	3,448.27	14,504.97	9,948.57	4,556.40	16,977.8
Road Surface	2,666.41	834.68	1,831.73	10,828.12	8,992.50	1,835.62	14,771
Motorway Signage	1,137.50	443.65	693.85	3,678.37	3,041.14	637.23	3,307.9
Motorway Drainage System	1,399.39	570.22	829.17	5,538.97	4,774.60	764.37	3,157.2
Buildings	489.42	91.60	397.82	613.24	331.34	281.90	1,356.8
Shoulder, Traffic Islands, Kerbs-Gutters and Sidewalks	446.90	46.37	400.53	444.92	156.82	288.10	755.4
Other (material transportation, tidiness, training, etc.)	2,908	2,857	51	7,280.50	7,276	4.50	466
Common and Special Bridges	50	24	26	420	170	250	228.5
Tunnels, Cut and Cover, Landfills and Trenches	4,258	1,824	2,434	699	608	91	196
Cleaning	-	-	-	186	178	8	55
Winter Maintenance	-	-	-	48	48	-	9
Green Areas and Trees	55	-	55	53	-	53	-
Total	21,505.39	11,338.02	10,167.37	44,295.08	35,524.97	8,770.11	41,280.6

Roadside barriers that were replaced

A.Th.E.: 4,932 meters
IONIA ODOS: 1,857 meters

Structural Adequacy

The Structural Adequacy monitoring program for concrete structures designed by the technical department of Nea Odos is the main tool for planning maintenance work. The program includes a comprehensive plan of regular inspections and systematic interventions in 350 large technical departments, bridges and (upper and lower) crossings.

Its purpose is to record the findings of the visual inspections, to evaluate them, to identify the needs and to carry out interventions in the constructions as a priority, in case these interventions are deemed necessary. Strict safety rules ensure the structural integrity of the motorways and protect drivers from dangerous accidents.

Asphalt surface replacement from the Metamorfosi interchange to the Varibobi interchange

In order to maintain and upgrade the quality of the project, in 2019 Nea Odos commenced additional works aimed at maintaining the surface anti-slip characteristics of the asphalt at the highest possible levels and the structural reinforcement of the road surface where necessary.

Starting in May 2019 and having a timeline of completion at the end of the same year, Nea Odos designed, planned and implemented asphalt replacement works in the section of the Athens - Thessaloniki motorway between the Metamorfosi interchange and the Varibobi interchange in Attica. The total budget of these works was €8.5 million for 2019.

This is the section with the highest traffic load, which serves thousands of drivers every day. The design and implementation of these works was a huge challenge, as this section has 3 traffic lanes plus the motorway hard shoulder and the key factor for carrying out the work was to ensure the smooth movement of vehicles.

Considering a number of scenarios, we chose the solution of starting the work at ten in the evening and finishing it at six the next morning. Although this solution leads to a cost increase of about 40-45%, it was estimated to be the only possible solution to avoid traffic jams on one of the most important motorways in the country. The increase in the overall budget came mainly from the need to manage the extra risk of working at night and the need to commit additional equipment and production units to deal immediately with any failure at night during which it is impossible to seek outside assistance.

The maintenance work program is extended to the long distance part of PATHE and will continue in the coming years.

Tunnel Enhancement Program

In 2019, Nea Odos commenced the development of a new system of industrial automatic control and telemetry (Supervision Control and Data Acquisition - SCADA) of tunnels in use, which covers all tunnels. Positive results include:

- leverage of technological developments with improved material performance
- compliance with new specifications
- new possibilities in case of failure
- improved and remote hardware/software management
- new development/control tools (simulation)
- adoption of security practices for protection against hacking



Planning the new SCADA

1. Detailed mapping of the current situation
2. Defining a new topology
3. Defining new needs (new systems, scenarios and new functionalities)
4. Forecasting future needs
5. Design of individual systems (e.g., Interlocks)
6. Design & study of new facilities

Development of a new SCADA for tunnels in operation Analysis of interventions

1. Organization and Management
2. Implementation Plan
3. Risk evaluation

Commencement of Operations for the new SCADA

1. Simulator to familiarize operators
2. Tests of all systems and equipment
3. Staff training & compilation of operation and maintenance manuals
4. Commencement of Operations





4.3 | Traffic and Incident Management

Winter Maintenance Management and Acute Weather Phenomena

The winter maintenance program requires excellent organization, impeccable coordination and adherence to specific certified procedures so that in case of extreme weather events, such as heavy snowfall or frost on the road, immediate intervention occurs. The winter maintenance program focuses on the following points:

- supply of sufficient quantities of salt for the entirety of each motorway
- setting up service stations at appropriate points
- maintenance of snow removal machines
- continuous cleaning of manholes and the drainage systems
- improvement of horizontal and vertical reflective signage
- organizing and implementing drills with the participation of all emergency and first aid providers
- the close and honest collaboration with all involved parties

The winter maintenance programme which Nea Odos implements is supported by the operation of the following snow removal centres:

A.Th.E. motorway section: Varibobi, Markopoulo, Schimatari, Thiva, Akraifnio, Martino, Tragana, Latomeio.

Ionia Odos motorway: Messolongi, Amfilochia, Filipiada, Terovo and Episkopiko.

Acute Weather Phenomena Management Plan



1

We plan for acute weather phenomena

- measurements of meteorological stations installed along the roads
- forecast reports from the respective authorities
- reports from our employees

2

We notify all concerned agencies (the Police, the Fire Department, the National Emergency Aid Center and the Vehicle Collection Units)

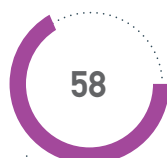
We ask for Police assistance for the safe traffic control within the motorway

Winter maintenance

A.Th.E.



hours of snow removal

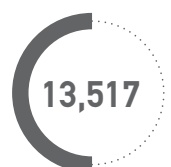


subcontractor's snow removal vehicles

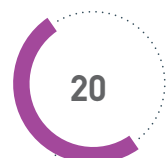


Nea Odos' small snow removal vehicles

IONIA ODOS



hours of snow removal



subcontractor's snow removal vehicles



Nea Odos' small snow removal vehicles

Winter maintenance - snow removal exercises

A.Th.E.:

Two winter maintenance - snow removal exercises took place in November and December 2019 in order to maintain the safe operation of the motorway as well as to improve the communication between the motorway departments and the winter maintenance subcontractor.

IONIA ODOS:

A winter maintenance - snow removal exercise took place in November 2019, which aimed to maintain the safe operation of the motorways as well as to improve the communication between the motorways and the winter maintenance subcontractor.

3

We mobilise all road safety patrol cars
We apply the emergency safety and intervention procedures

4

We inspect the infrastructure and our equipment

5

We actively support our employees that have been involved in the incidents

6

We continuously inform users via all available communication channels

Traffic and Tunnel Management Centres

The Traffic Management Centres (T.M.Cs) and Tunnel Traffic Management Centres (T.T.M.Cs) operate 24 hours a day and are responsible for the effective management of traffic and various incidents. In addition, they are the main point of communication with the competent bodies in cases of emergencies, while contributing to the maximum as regards their effective management. For the reasons mentioned above, they are staffed with specialized scientists and specialized personnel and are equipped with the most advanced technical and technological equipment. These centres receive emergency calls, collect and examine important information in each incident, analyse traffic data and, when necessary, mobilize the Road Safety Patrols and inform all emergency services such as the National First Aid Centre, the Civil Protection Agency, the Traffic Police, etc.

The T.M.Cs and T.T.M.Cs of Nea Odos are located:

- the central T.M.C. in Schimatari, Viotia region (A.Th.E. motorway)
- T.T.M.C. in Aghios Konstantinos – Kammena Vourla (A.Th.E. motorway)
- the central T.M.C. in Klokova Tunnel (Ionia Odos motorway)
- T.T.M.C. in Episkopiko, Ioannina region (Ionia Odos motorway)

The works of the T.M.Cs and T.T.M.Cs are supported, supplemented and completed by:

- the Road Safety Patrol Cars
- the Free Road Assistance Service
- the SOS Phones installed along the entire motorway
- the 4-digit 1075 emergency number

In addition to the above Centres, in Nea Odos there are also special Maintenance Centres which are usually the bases for the competent Fire and Police departments.

The Maintenance Centres are mapped as follows:

A.Th.E. Motorway:

- Markopoulo (Maintenance Building) K.P. 38.700
- Thiva (Maintenance, Fire and Police Buildings) K.P. 89.835
- Atalanti (Maintenance, Fire and Police Buildings) K.P. 145.325

Ionia Odos Motorway:

- Messolongi (Maintenance and Police Buildings) K.P. 31.500
- Amfilochia (Maintenance and Police Buildings) K.P. 100.500
- Filipiada (Maintenance and Police Buildings) K.P. 154.130

	2019		2018	
	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS
Traffic Surveillance Cameras				
Open-air CCTV	115	132	106	132
Tunnel CCTV	134	150	134	150

Road Safety Patrols

The role of the Road Safety Patrol Cars is crucial for road safety. The specially equipped vehicles manned by specialized and trained employees operate 24 hours a day along the motorway to detect incidents and intervene where deemed necessary. The patrols undertake the inspection of equipment and of some infrastructure, pointing out damage that might have occurred, directly handling incidents and providing assistance to immobilised vehicles

Their main responsibilities include:

- Instant intervention patrolling
- Locating and managing incidents
- Inspecting the infrastructure and equipment (the road pavement, fencing, guardrails, road lights) for potential damage
- Removing objects from the pavement
- Providing assistance to immobilised vehicles and removing them
- Installing emergency signage
- Assisting the competent emergency state authorities
- Ancillary escorting of oversized vehicles if deemed necessary
- Escorting vehicles carrying hazardous loads through tunnels
- Identifying risks for the motorway users

Incidents by Category	Total Incidents by Category		
	2019	2018	2017
Vehicles Breakdown	23,171	22,458	19,092
Obstacles – Spillage – Moving Hazard	13,075	14,973	12,171
Other Incidents	5,236	5,558	2,859
Accidents and Crashes	1,640	1,461	1,358
Abandoned Vehicles	429	427	401
Total	43,551	44,877	35,881

Nea Odos Average Response Time by Incident Type (in minutes)			
Incidents	2019	2018	2017
Accidents and Crashes	10.1	10.3	10.6
Vehicles Breakdown	7.2	7.5	8.3
Abandoned Vehicles	2.9	4.4	4.5
Obstacles – Spillage – Moving Hazard	8.3	8.7	10.3
Other Incidents	4.4	4.8	9.8

Average Response Time by Agent (in minutes)			
Agent	2019	2018	2017
Nea Odos	7.4	7.7	9.1
Fire Brigade	9.9	12.2	23.9
Vehicle Recovery Unit	28.2	26.9	39.1
Ambulances	18.3	19.5	19.8
Traffic Police	21.4	22.8	15.0
Other Agents	-	11.1	16.7
Heavy Vehicle Recovery Unit	44.8	44.5	13.1

Immobilised Vehicle Management

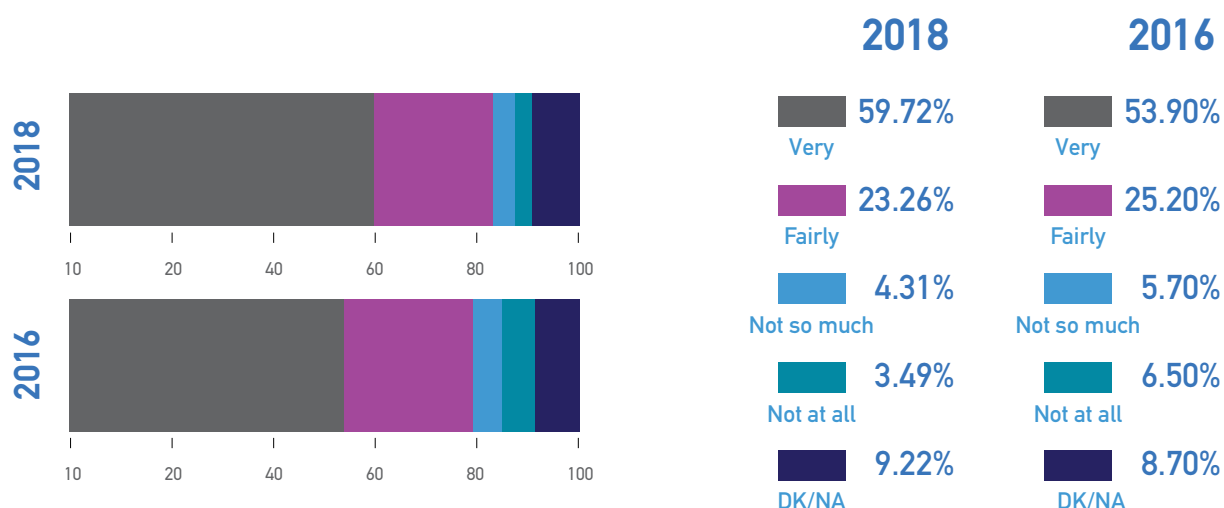
In order to reduce traffic problems and ensure the protection of drivers and passengers, Nea Odos offers free collection and transportation services for immobilized vehicles. As part of the service, the company's collection cars tow the immobilized vehicles to the nearest safe point, which may be located in a part of the rest of the road network or in a safe place within the Concession project, such as at the Motorist Service Stations.

During 2019, more than 7,400 vehicles were safely towed away, 811 of which were heavy vehicles.

Towed Vehicles	A.Th.E.			IONIA ODOS		
	2019	2018	2017	2019	2018	2017
Conventional Vehicle Recovery	4,549	4,369	4,816	2,052	1,847	1,239
Heavy Vehicle Recovery Unit	624	602	642	187	191	108
Total	5,173	4,971	5,458	2,239	2,038	1,347

Immobilised Vehicles Incidents	2019		2018	
	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS
Flat tire	2,965	1,034	2,757	1,081
Mechanical failure	8,352	3,907	7,685	3,677
Fuel	1,039	387	1,174	625
Other	1,599	1,687	1,438	926
Unrecorded	751	886	1,279	1,750
Total	14,706	7,901	14,333	8,059
Driver sickness (it is a separate event and it is not included in the report of immobilised vehicles)	88	28	94	27

How happy are you with the service of the roadside assistance teams?



Habits and Attitudes Survey of Nea Odos' Subscribers (November-December 2018)

SOS Phones and Emergency Number

SOS Phones: 648 SOS Phones have been installed along the entire motorway, including in the tunnels, for the immediate, free-of-charge communication with both the Traffic and Tunnel Management Centres (T.T.M.Cs).

4-digit 1075 emergency number: Users are able to directly communicate with the Traffic and Tunnel Management Centres (T.T.M.Cs) in order to provide information regarding emergency incidents, by calling the 1075 emergency number.

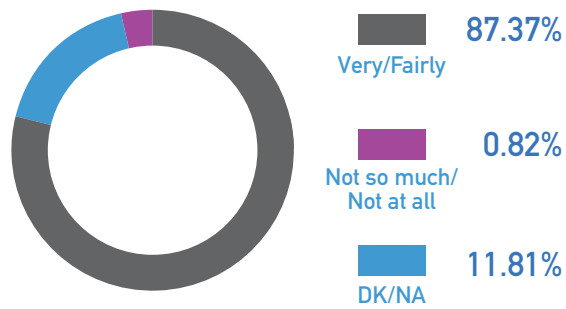
SOS Phones along the Motorway	A.Th.E.			IONIA ODOS		
	2019	2018	2017	2019	2018	2017
Number of devices	386	386	308	262	262	254

Emergency Call Centre Data	2019			2018			2017
	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Incoming calls	84,467	64,061	20,406	72,551	51,799	20,752	55,512
Answered calls	83,739	63,865	19,874	71,981	51,474	20,505	54,558
Efficiency	99.1%	99.7%	97.4%	99.2%	99.4%	98.8%	98.3%
Average call duration (in seconds)	56.00	56.29	55.06	56.68	56.87	56.22	57.05

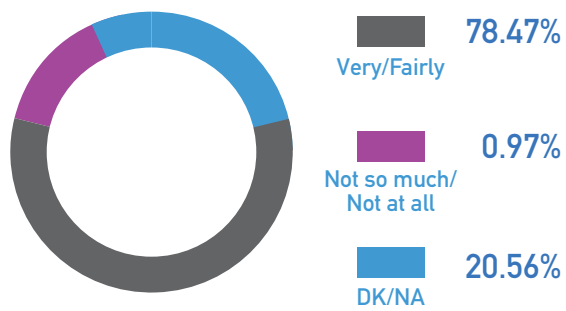
Emergency Call Centre - Issues by Category	2019		
	Total NEA ODOS	A.Th.E.	IONIA ODOS
Maintenance	33.0%	27.9%	39.4%
Traffic	32.6%	34.0%	30.8%
Patrols	24.5%	23.0%	26.3%
Other	8.2%	12.7%	2.7%
Safety	1.7%	2.4%	0.8%

How satisfied are you with the emergency phone number service?

A.Th.E.



IONIA ODOS



Roadside Survey (November 2018)



Awareness Campaigns | 4.4

Nea Odos places special emphasis on programs and initiatives related to the change of mentality in driving, with the aim of preventing and achieving the 'Vision Zero' as regards casualties. In 2019 we remained focused on the crucial role of human behaviour and driving attitudes and in particular on how drivers interact with the road environment. The primary goal of all these actions is to improve the driving behaviour. Specifically, we focused on three key areas for enhancing a culture of safe driving behaviour based on information and knowledge.

Strategic partnerships with specialized organizations

Since 2010 we have been collaborating with the "Panos Mylonas" Hellenic Road Safety Institute to implement innovative programs focusing on young people and vulnerable social groups. At the same time, at Nea Odos we support relevant actions and initiatives in all regions of the country.

Information and awareness campaigns

Throughout the year, we implement awareness campaigns for drivers by creating special videos, special reports on our website and distributing leaflets at toll stations. The main topics we focus on are driving under difficult weather conditions, good driving behaviour within a motorway, specific road safety parameters within tunnels, proper use of child seats, non-aggressive driving and eco-driving, etc.

Conferences and presentations

At Nea Odos, we believe in the positive impact that our partnerships create, and hence we systematically take part in workshops and conferences to disseminate the message of safe driving and to inform about the actions we implement at the local level.

¹ *EU Road Safety Policy Framework 2021-2030 - Next steps towards 'Vision Zero'*

Safety Pit Stop: Road Safety in Action by Anytime and Nea Odos!

Nea Odos and Anytime of INTERAMERICAN joined forces on the 14th and 15th of June 2019 which due to the bank holiday in Greece it meant increased traffic, designed and implemented the "Safety Pit Stop" initiative, proving in practice their commitment to promoting road safety.

In a specially designed space, at the "Sirios" Motorist Service Station, in Malakasa, specialized staff and technicians of CAR POINT, a private repair shop of INTERAMERICAN, offered to all interested drivers the free "7-point Trip Control" for their vehicle. At the same time, when deemed necessary, the technicians proceeded to replenish fluids, oil and air, completely free of charge. Upon completion of the inspection, the drivers received as a gift a bag containing a first aid kit for their car.

The "7-point Travel Check" focused on:

- water level
- battery status
- brake's fluid
- steering wheel fluid
- engine oil
- tire pressure
- light control

The "Safety Pit Stop" initiative enriches the cooperation that INTERAMERICAN and Nea Odos have already developed, in the context of providing roadside assistance services to vehicles that are immobilized within the motorways that the company operates, maintains and manages.

Connection to the Sustainable Development Goals and Goal Setting



3. GOOD HEALTH AND WELL-BEING



11. SUSTAINABLE CITIES AND COMMUNITIES



3. GOOD HEALTH AND WELL-BEING



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES AND COMMUNITIES



3. GOOD HEALTH AND WELL-BEING



3. GOOD HEALTH AND WELL-BEING

Topic	2019 Goal	2019 Progress	2020 Goal
Accident related indicators	Zero accidents on motorway (refers to users and employees)	Users: 1.640 Employees: 15 Motorway Accidents Index: 82.60	Zero accidents on motorway (refers to users and employees)
Motorway upgrades	Development of new SCADA	Put in operation	Pilot installation of "Smart" security cameras for automatic incident detection
Accident response time	Ongoing reduction of response time	Average response time reduction from 7.7 min to 7.4 min	Ongoing
Annual Recertification	Annual Recertification: ISO 39001	Completed	Annual Recertification



5

QUALITY SERVICE PROVISION

Primary Sustainable Development Goals



9. INDUSTRY, INNOVATION
AND INFRASTRUCTURE

9.1 Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, with a focus on affordable and equitable access for all.



17. PARTNERSHIPS
FOR THE GOALS

Secondary Sustainable Development Goals

In 2019, Nea Odos:

invested more than
€83.5 million
to local and national suppliers

managed **90.911**
customer calls and messages

invested **€2,351,844**
for Fast Pass subscription programmes

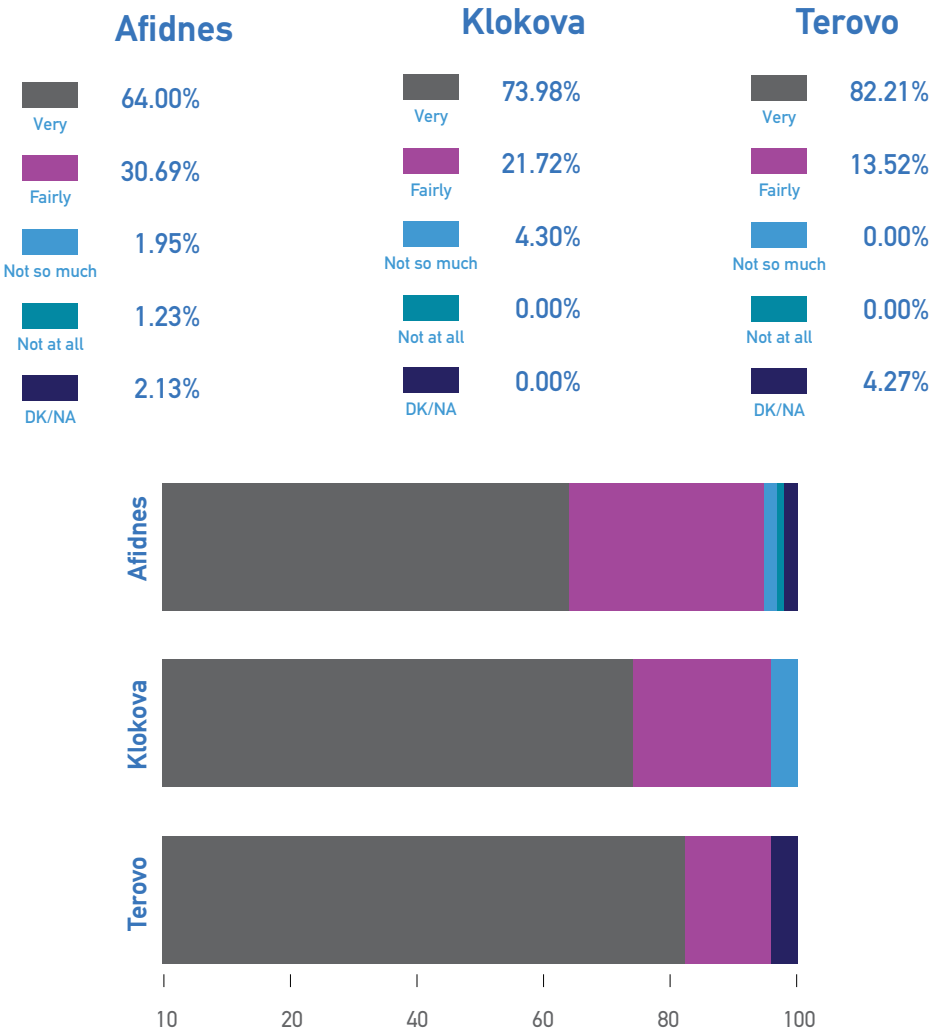
Our Human-Centred Approach | 5.1

At Nea Odos we apply a human-centred service model based on which the processes and the internal organizational systems are constantly upgraded and improved. Our goal is to meet the growing needs of the areas adjacent to the motorways under our responsibility, as well as the operating requirements of the motorways themselves.

By adopting and applying standards such as ISO 9001, ISO 14000, OHSAS 18001 and ISO 39001, we strive to continuously improve the level of services provided.

In this context and because we want every driver to feel that we are the best possible travel companion, we place particular emphasis on the degree of our internal efficiency, the quality of our services, the response time and the comments and suggestions of our internal and external stakeholders.

How satisfied are you with the overall behaviour of Nea Odos' employees and the service provided in the Customer Service Centres?



Habits and Attitudes Survey of Nea Odos' Subscribers
(November-December 2018)

5.2 | The First Electromobility Friendly Motorway

Ionía Odos is the first motorway in the country to provide fast charging stations for electric vehicles along its entire length, contributing thus to reducing the environmental footprint of the motorway and to expanding electromobility which is still in its infancy.

All Motorist Service Stations at Ionía Odos enable electric car drivers to charge their vehicles in a short period of time. In addition, the motorway is connected to the port of Igoumenítsa via the Egnatia Motorway, which allows travellers with electric cars to seamlessly travel in Greece.

5.3 | Motorist Service Stations

Along the A.Th.E. and Ionía Odos motorways there are Motorist Service Stations, serving mainly refuelling and catering needs on a 24-hour basis.

The design and operation of the Motorist Service Stations are based on a range of best practices and they have been designed so that:

- the facilities should be safe and functional for travellers who use them.
- the facilities harmoniously fit within the surroundings with the mildest possible interventions.
- the buildings comply with the requirements of the Building Energy Performance Regulation for the purpose of improving their energy efficiency, saving energy and protecting the environment.
- they provide in their entirety the possibility of fast charging of electric vehicles in Ionía Odos, (in A.Th.E. so far charging is provided only in the Atalanti Motorist Service Station, while in the following years the installation of charging infrastructure is planned in all remaining Motorist Service Stations)
- they provide a variety of dining and leisure options such as restaurants and fast-food restaurants, Mini Markets, bookstores, ATMs, cafes.



Energy Management at the Motorist Service Stations

For the energy efficiency of the Motorist Service Station buildings, the best available design and construction solutions are utilized, going beyond the minimum requirements of the existing legislation where deemed appropriate (3661/2008, and 3851/2010 Laws and the Building Energy Performance Regulation). It is worth noting that electricity from renewable energy sources covers to the maximum level the needs of the Motorist Service Stations.

Results of Building Energy Inspections

Atalanti Motorist Service Station	Fuel Station Building: B+ Commercial and Catering Building: B
Episkopiko Motorist Service Station	Commercial and Catering Building: B
Evinochori Motorist Service Station	Fuel Station Building: B+ Commercial and Catering Building: B
Filippiada Motorist Service Station	Mixed-Use Building: B
Amvrakia Motorist Service Station	Mixed-Use Building: B
Amfilochia Motorist Service Station	Mixed-Use Building: B

Water Management at the Motorist Service Stations

Regarding water management, the relevant guidelines for the protection and sustainable use of water have been taken into account². The environmental licensing of the Motorist Service Stations, through the River Basin Management Plans per Water Unit, includes the relevant conditions, restrictions and measures for the implementation of sustainable water resources management policies. Also, in order to ensure a balance between the groundwater aquifer pumping and replenishment, the treated wastewater is used (for irrigation, washing of the landscaped areas and firefighting) and through this, savings of water resources from other sources such as groundwater from drilling are achieved.

In the public toilets of the Ionia Odos Motorist Service Stations and in all parking lots of A.Th.E. and of Ionia Odos there are taps with an automatic flow cut-off mechanism for savings.

² EU Water Framework Directive, 2000/60 /EC of the European Parliament and of the Council of 23 October 2000, Law 3199/2003, Presidential Decree 51/2007.





5.4 | Tolls

Toll Zone System for Charging and Collecting Tolls

Toll rates as well as their potential modifications are expressly defined in the Concession Agreement which has been ratified by the Hellenic Parliament and is a law of the State. In the Concession Agreement, the fact that in no case can the company unilaterally modify the toll rates, that is without the prior approval of the State, is highlighted.

The toll rate for each station (frontal and lateral) is determined as follows:

- at the frontal station and per road traffic direction, it is based on the total length of the zone it belongs to
- at the lateral exit stations, it is based on the length covered from the beginning of the zone to which the station belongs till the station, whereas at the lateral entrance stations it is based on the length the user will cover from the toll station till the end of the zone

Toll payment zones:

In accordance with the institutional framework of Nea Odos, at A.Th.E. motorway, three toll zones are identified and at Ionia Odos four zones. The toll rates for a route varies depending on the vehicle category and the motorway zone in which the driver is traveling. More information is available on our website.

Payment Methods

Attendant

Payment in cash at a toll booth lane with an attendant



Automatic Payment

Automatic Payment Machines



Fast Pass

The Fast Pass e – transponder is provided free of charge to the subscribers of Nea Odos



POS

Credit Card Readers



Subscription Programs



For all four- wheeled category 2, 3 and 4 vehicles.



Discounts up to 50% for Category 2 vehicles depending on the frequency use of the Afidnes, Kapandriti, Malakasa and Inofita Toll Stations.



Exclusive for the permanent residents of the Oropos Municipality and the Varnava Municipal Community of the Marathon Municipality for free crossings at the Afidnes toll station. Based on the agreed commitments of our company, the maximum subscription limit for the program has been exceeded.



It concerns exclusively the KTEL crossings from the toll stations of Tragana. It is valid until the issue of boarding and disembarking Stations in the area is finalized.

More information about the available subscription programs is available on the special website: www.fastpass.gr

Nea Odos' investments in the subscription programmes	2019	2018
Fast Pass Oropos	€2,079,495.90	€329,563.10
Fast Pass Frequent	€272,347.97	€261,506.94
Fast Pass Tragana	€35,900.20	€19,032.66

Evolution of ETC Transponders and Accounts for Fast Pass	2019	2018	2017
Number of current accounts by the end of the month (average)	77,473	61,782	46,428
Total number of active Transponders by the end of the month (average)	105,288	84,548	63,423



5.5 | Communication Channels

In Nea Odos we utilise the following channels of systematic communication with all its stakeholders in order to:

- be formally **informed of their views** on its activities
- regularly collect official **opinions** and record credible trends
- **record** any issues that arise and resolve them immediately and effectively
- **encourage communication of ideas and identification of possible omissions**
- inform about its strategy actions
- **update on its operational issues**

Main Communication Channels



22950-26900

Customer Care
Call Centre



- **A.Th.E. motorway**, right before the Afidnes Toll Station, towards Lamia
- **Ionía Odos** motorway, right before the Klokova Toll Station, towards Ioannina and also at the Motorist Service Station at Episkopiko, towards Antirrio

**The Customer
Service Centre**



customercare@neaodos.gr

Dedicated
Customer
Service email



www.neaodos.gr

Corporate website



24 months

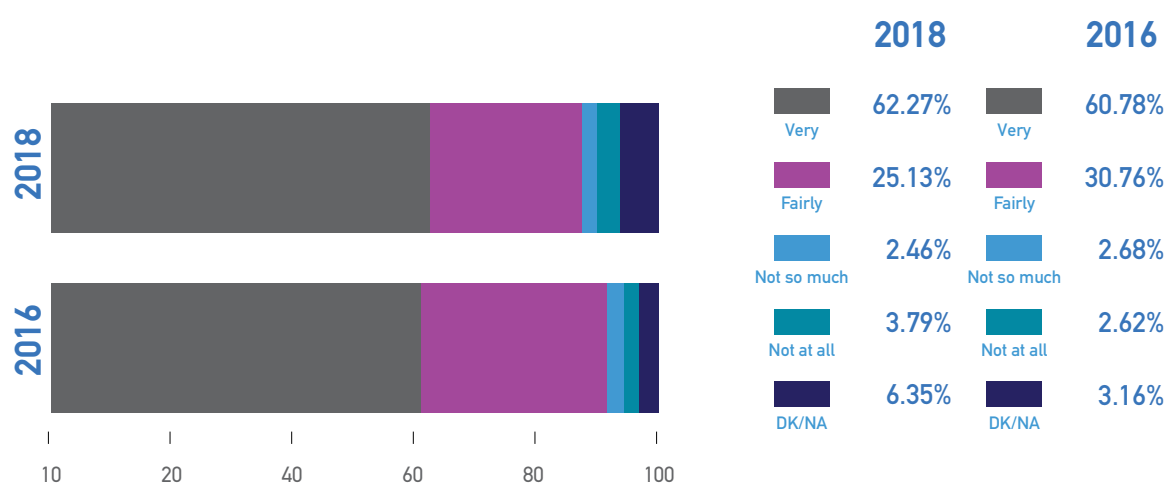
Opinion surveys

Out of the **72,327** calls handled by the Customer Service Department, **3,670 (5.1%)** concerned complaints.

Customer Care Call Centre	2019			2018			2017
	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Incoming calls	100,113	22,883	77,230	70,445	44,371	26,074	79,986
Answered calls	72,327	17,748	54,579	61,459	37,759	23,700	69,336
Efficiency	72.2%	77.6%	70.7%	87.3%	85.1%	90.9%	87.8%
Total complaints submitted by phone		3,670			2,969		2,619
Number of calls with complaints about noise barriers		2			1		4

Customer Care Call Centre - Issues by Category	2019		
	Total NEA ODOS	A.Th.E.	IONIA ODOS
Electronic Toll Collection Operation	84.1%	84.1%	84.1%
Commercial Issues	5.4%	6.0%	3.0%
Safety	4.0%	3.9%	4.3%
Toll Operation	2.6%	2.6%	2.5%
Other	2.2%	2.1%	2.8%
Traffic	1.2%	0.8%	2.4%
Maintenance	0.5%	0.5%	0.9%

How satisfied are you with the behaviour of Nea Odos' employees and from the telephone service?



Habits and Attitudes Survey of Nea Odos' Subscribers
(November-December 2018)

Written Communication	2019			2018			2017
	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Total requests and complaints submitted	18,584	12,218	6,366	15,054	8,902	6,152	12,974
Average response time (days)	0.79	1.02	0.35	0.37	0.47	0.21	0.52
Requests and other issues		18,033			14,697		12,513
Complaints submitted		551			357		461
Complaints about noise barriers		-			5		3

Written Communication - Issues by Category	2019		
	Total	A.Th.E.	IONIA ODOS
Electronic Toll Collection Operation	85.8%	82.5%	92.3%
Toll Operation	7.7%	8.9%	5.3%
Commercial Issues	4.4%	6.1%	0.9%
Other	1.1%	1.3%	0.9%
Compensation Claims	0.5%	0.6%	0.4%
Maintenance	0.4%	0.4%	0.2%
Safety	0.1%	0.2%	0.0%
Traffic	0.0%	0.0%	0.0%

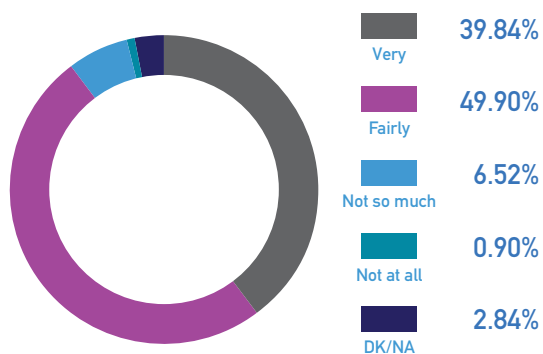
In 2019, we received, handled and resolved a total of **4,221** complaints, which in accordance with our policies fall into 10 main categories: Toll operations (1,723), Traffic and security (1,113), Negative comments (628), Compensation claims (242), Commercial policy (193), Miscellaneous (132), Signage (131), Driver Requests (27), Interoperability (26) and Motorway Project (6). However, we did not receive any report nor any complaint about major environmental issues.

Complaints by Category	Customer Care Call Centre		Written Communication		Total	
	Number	%	Number	%	Number	%
Toll Operation	1,524	41.5%	199	36.1%	1,723	40.8%
Traffic and Safety	1,013	27.6%	100	18.1%	1,113	26.4%
Negative Comments	578	15.7%	50	9.1%	628	14.9%
Compensation Claims	131	3.6%	111	20.1%	242	5.7%
Commercial Policy	150	4.1%	43	7.8%	193	4.7%
Other	120	3.3%	12	2.2%	132	3.1%
Signage	113	3.1%	18	3.3%	131	3.1%
Driver's Requests	19	0.5%	8	1.5%	27	0.6%
Interoperability	17	0.5%	9	1.6%	26	0.6%
Motorway Project	5	0.1%	1	0.2%	6	0.1%
Total	3,670	100.00%	551	100.00%	4,221	100.00%

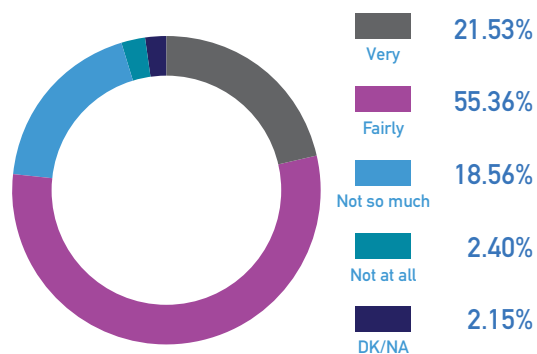
How satisfied are you with the result of Nea Odos' staff efforts that deals with...

2018

Cleanliness



Maintaining road quality



Habits and Attitudes Survey of Nea Odos' Subscribers
(November-December 2018)

5.6 | Personal Data Management

The collection of personal data of motorway drivers and users for customer service, communication and incident handling is essential. We pay special attention to the protection of personal data and always in accordance with the provisions of the relevant "Directive on Closed Circuit Television" of the Greek Personal Data Protection Authority.

The data we record is mainly collected from:

- telephone conversations with drivers on customer service issues, for the sole purpose of improving the services rendered requests,
- for requests such as cards for people with special needs, and subscription plans,
- cameras along the motorway used exclusively for smooth traffic management and effective traffic accident response.

In this context, we take appropriate technical and organizational measures relating to the collection, storage and management/processing of personal data and to prevent accidental loss or destruction and unauthorized and/or illegal access to, use, modification or disclosure of it. Especially for the security of electronic transactions, the company applies special procedures and security standards. In our website (<https://www.neaodos.gr/privacy-notice>) there is a published privacy statement regarding the Security and Processing of Personal Data.

5.7 | Partners, Subcontractors and Suppliers

The excellent collaboration Nea Odos has with its partners, subcontractors and suppliers is based on a shared understanding of the importance of the project and the need to comply with the terms and conditions that guarantee its quality. Selecting suppliers is a demanding process and is based on the assumption that suppliers share the same corporate values and principles with us.



Selection Process

In order to ensure the high quality of our services, it is imperative to adhere to specific and rigorous selection procedures for our partners, subcontractors and suppliers. The Nea Odos suppliers include: the construction consortium, the engineering companies, the suppliers exclusively working on the construction works of Nea Odos, the subcontractors for the maintenance of civil engineering works, snow-clearing and equipment maintenance, suppliers for consumables, external collaborators providing support for operating issues (consultants, attorneys, certified auditors) and others.

The Quality Management System implemented by Nea Odos describes binding procedures for managing procurement projects and relationships with suppliers.

Indicative stages/characteristics of the process are as follows:

- selection after an open market research
- submission of at least 3 different offers
- requirements are predefined by our company
- responsible business activity of the suppliers and the quality features of the service / product are taken into account
- annual evaluation of existing suppliers' performance

Specifically, for subcontractors who wish to cooperate with the company, the following are provided:

- the obligation to sign a declaration of compliance with the environmental requirements of the project in order to cooperate with the company
- their formal commitment to comply with the environmental conditions and to take preventive measures to avoid adverse environmental impacts
- the Company's key subcontractors are audited through regular environmental inspections, notably regarding operation and maintenance issues, and are required to provide the required certifications and permits

Nea Odos records the official certifications received by the professionals with whom it cooperates. Most of our main suppliers are certified on one or more of the following systems, depending on their field of activity:

- ISO 9001:2008 and 9001:2000, 9001:2015, 9001:2005
- ISO 14001:2004 and 14001:2015
- ISO 22000:2005
- EN 361:2002
- EN 358:1999
- EN 3834-2
- OHSAS 18001:2007
- CE - EN 12899-1:2007
- ISO 45001:2018
- ISO/IEC 27001:2013
- EL0T 1801:2008
- FSSC 22000
- HACCP
- OHSAS 18001:2007

Assessing Suppliers

Ensuring both high quality and compliance with and implementation of the legislation throughout our sphere of influence helps to reduce financial security and performance risks, as well as potential negative impacts on the company's reputation and image. For this reason, Nea Odos carries out regular and thorough inspections regarding its suppliers related to infrastructure operation and maintenance.

In 2019 we upgraded the evaluation process of our critical suppliers and partners. This development is reflected in our corporate structure. The new process is carried out electronically and introduces wider evaluation criteria with differentiated significance levels to ensure a more objective and effective evaluation. We also strengthened the cooperation between the departments by enabling the joint evaluation of partners and suppliers.

The wider criteria by which suppliers and subcontractors are evaluated on are the following:

Quality

- Quality of relationships
- Quality of service
- Delivery times
- Ability to respond
- Communication

Economic Policy

- Fees and Cost

Readiness & Compliance

- Business continuity
- Compliance with Nea Odos' requirements
- Integrity and Transparency
- Health and Safety
- Environmental consciousness

Nea Odos has identified a total of 221 major suppliers with whom it collaborates. According to the 2019 evaluation, the annual average evaluation was 4.1 out of 5.

The company did not carry out environmental audits on new suppliers during the reporting year, nor did it observe significant negative environmental performance from its suppliers. In 2019, an incident was recorded by our suppliers that forced us to terminate a partnership and concerned non-compliance with delivery dates.

Good practices:

- meetings with key suppliers, aiming at better communicating and preventing or resolving issues that have arisen,
- central coordination of all procurement issues, which increases the efficiency of the procurement system,
- organization of tenders for the supply of materials that can be grouped (e.g., clothing, tires) so that a central agreement can achieve economic benefit and speed in purchasing,
- ongoing proposals for optimizing ordering/delivery procedures, etc.,
- sample inspections of suppliers' deliveries.

Local Suppliers

Nea Odos, through its cooperation with suppliers, prioritizes the absolute coverage of its needs and the optimal quality of the services it offers. Particular emphasis is placed on supporting national and especially local suppliers, where possible. The company thus strengthens the local markets and **contributes to the development of local communities**.

Suppliers by Category/Origin						
Suppliers Categories	2019		2018		2017	
	Number of Suppliers	Investment (€)	Number of Suppliers	Investment (€)	Number of Suppliers	Investment (€)
Local	428	1,251,110.79	431	1,531,551.76	470	3,806,213.48
National	257	82,334,390.00	263	111,450,848.38	341	275,098,329.04
International	17	640,150.77	32	743,048.3	32	1,900,846.91
Total	702	84,225,651.56	726	974,428	843	280.805.389,43

The category of national suppliers also includes transactions with related parties estimated at €21,933,135.08. The operational support to the Motorways of Central Greece (amounting €41,277,357.00) is also included. However, this transaction is carried out through the State and Nea Odos and is therefore not included in the transactions between the related parties.

Online Tenders



Nea Odos uses a dedicated online tendering platform in order to ensure the effective management of procurement tenders. More specifically, the platform allows prospective suppliers to bid online within a set timeframe and have the opportunity to submit multiple interim bids. The most suitable tenderer is selected after the offers are evaluated on the basis of economic and quality criteria.

In 2019, three tenders were held through this platform, with the total benefit for Nea Odos amounting to approximately €79,000.

The online tenders concerned:

- disinfection services
- supply of long-term rental vehicles
- supply of vehicle weight measurement system in motion

Connection to the Sustainable Development Goals and Goal Setting



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



17. PARTNERSHIPS FOR THE GOALS

Topic	2019 Goal	2019 Progress	2020 Goal
Customer Satisfaction Survey	Conduct a mystery survey for the assessment and further improvement of our services Conduct a customer satisfaction survey	Completed Next survey is planned for 2020	Conduct a mystery survey in 2021 Conduct an opinion survey on the motorway and its impacts
Customer Care Call Centres	Maintain a high level of "Very satisfied customers"	Next review is planned for 2020	
Driver services upgrade	Design a mobile application for drivers	Design and pilot the application: MyOdos	Official launch of the application: MyOdos
Electronic tender platform	Utilise platform for tenders	Conducted 3 tenders via the platform (jointly with Kentriki Odos)	



6

HUMAN RESOURCES

Primary Sustainable Development Goals



8. DECENT WORK AND ECONOMIC GROWTH

8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young.

Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



4. QUALITY EDUCATION



5. GENDER EQUALITY



10. REDUCED INEQUALITIES



16. PEACE, JUSTICE AND STRONG INSTITUTIONS

During 2019, Nea Odos:

organized training courses and
121 people were trained

provided 855 hours
of Health & Safety training

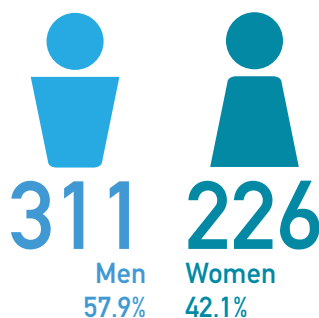
recruited 64
new employees

invested €295,352
for Health and Safety projects

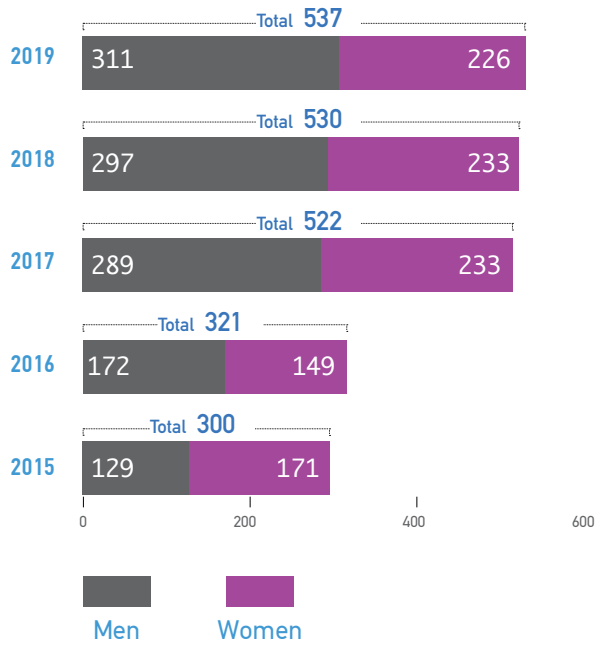
6.1 | Our People

Recognizing that our employees are the driving force for achieving our corporate goals, we place special emphasis on education, development, talent retention as well as on health and safety, providing a working environment which is safe and fair. At the same time, through policies and procedures, we care for the protection and respect of every employee, ensuring the implementation of all our business decisions that are based on the principle of equal opportunities.

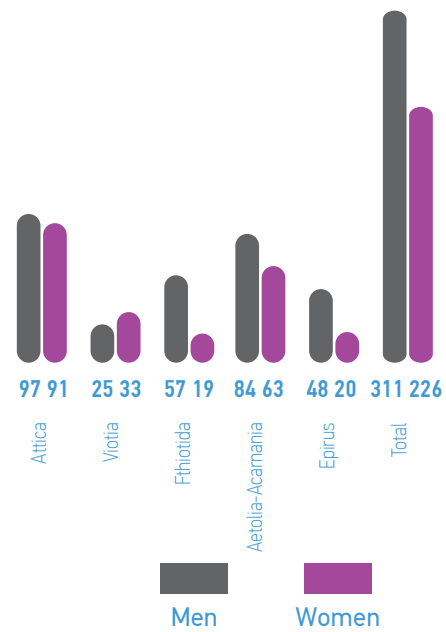
In 2019, 537 people were employed in the company.



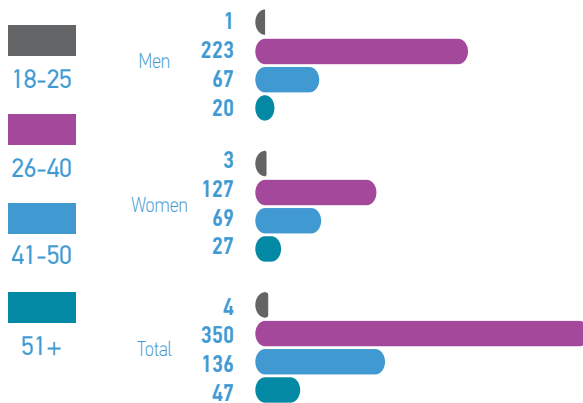
Human Resources Data



Human Resources by Geographical Area and Gender



Human Resources by Age and Gender



In Nea Odos, we employ an additional category of employees, those being seasonal workers, recruited for us by companies, with which we cooperate on a permanent basis. This category of employees covers emerging or seasonal needs of the company, including maternity leaves.

Human Resources by type of Employment and Employment Contract

Types of Employment and Employment Contract	Men	Women	Total	Percentage
Total staff	311	226	537	100.0%
Indefinite term employment contract	295	223	518	96.5%
Definite term employment contract	16	3	19	3.5%
Full-time employees	311	226	537	100.0%
Part-time employees	-	-	-	-
Seasonal workers through third parties	7	13	20	

New Employee Hires by Age and Geographical Area

	18-25	26-40	41-50	51+	Total
Attica	2	17	5	2	26
Viotia	-	10	3	-	13
Fthiotida	-	3	2	-	5
Aetolia-Acarnania	1	13	1	1	16
Epirus	-	2	2	-	4
Total	3	45	13	3	64

incoming (Total
number of
incoming/ total
employees)

11.9%

New Employee Hires by Gender and Age

	18-25	26-40	41-50	51+	Total
Men	2	26	7	1	36
Women	1	19	6	2	28
Total	3	45	13	3	64

Employee Turnover by Age and Geographical Area

	18-25	26-40	41-50	51+	Total
Attica	1	14	6	2	23
Viotia	-	11	-	1	12
Fthiotida	-	2	2	2	6
Aetolia-Acarnania	-	7	3	1	11
Epirus	-	3	1	1	5
Total	1	37	12	7	57

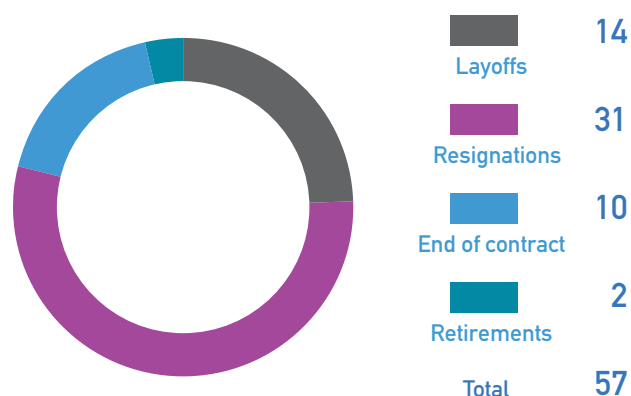
Outgoing (Total
number of
outgoing / total
employees)

10.6%

Employee Turnover by Gender and Age

	18-25	26-40	41-50	51+	Total
Men	1	12	7	3	23
Women	-	25	5	4	34
Total	1	37	12	7	57

Turnover Analysis



In 2019, the company employed 2 students in the Technical Department and 1 student in the Department of Public Relations and Marketing.

Equal Opportunities | 6.2

Nea Odos recognizes that advocacy and respect for employees' rights are intended to create a healthy working environment in which there is absolutely no discrimination on the basis of race, colour, gender, language, religion, politics or any other beliefs, ethnic or social background, property, or any other situation. For this reason, the company implements equal opportunities practices, which stem from full compliance with the relevant legislation, but mainly with our corporate culture. Specifically, in Nea Odos, the decisions concerning issues such as recruitment, evaluations, remuneration, vacation time, promotions, training, retirement, as well as termination of contracts are defined by non-discriminatory criteria and are not related to any form of discrimination. All employees receive equal pay for work of equal value. In addition, for the continuous improvement and development of a non-discriminatory working environment, the Human Resources Department has adopted the Open Door policy, which allows all employees to propose and discuss informally corporate issues with management representatives, managers, supervisors and others.

In 2019, no incidents of discrimination in the workplace were recorded nor were any complaints or grievances made by employees and/or third parties.

Gender Ratio by Employees Category/Rank					
Category/Ranks	Number			%	
	Men	Women	Total	Men	Women
Top Executives	4	-	4	100.0%	-
Managers	9	5	14	64.3%	35.7%
Administrative Staff	80	54	134	59.7%	40.3%
Labour Staff	218	167	385	56.6%	43.4%
Total	311	226	537	57.9%	42.1%

Benefits | 6.3

The company seeks to provide a work environment that promotes personal and professional development, supports and improves the quality of life of employees. In 2019, the company continued its benefit program and offered group life insurance scheme and health care for all employees and its dependents. Depending on the job position, the company also provided:

- Vouchers and productivity bonuses to 397 employees amounting to €122,000
- Mobile phones to 122 employees
- Company cars to 44 employees

The company covers the employee social contributions, as required by law, but there is no additional pension plan. The competent state agency provides the pension payments.

In 2019, 22 female employees received maternity leave. During 2019, 16 returned to their positions. In 2020, the remaining 12 are expected to return to their positions.

6.4 | Talent Development

Employee Performance Evaluation Process

performance and creates a common understanding of corporate goals and how to achieve them. The evaluation process focuses on employees' prospects and the support they need to achieve their goals and to evolve personally and professionally. In addition, it binds supervisors and employees to make joint decisions on steps needed to be followed.

In 2019, Nea Odos carried out the evaluation process for 2018 in two phases, offering the opportunity to its employees to map an individual development plan aligned with the Nea Odos corporate values.

The process was performed first for the service, operation, traffic management and maintenance personnel of the motorways and then for all administrative staff. Out of the 537 employees of Nea Odos, 432 people were evaluated (men: 244, women: 188), i.e., 80% of the staff. The total (100%) of the people evaluated have access to the results of their evaluation. The process is carried out for all personnel, except for the foreseen exceptions such as recent recruitment, staff on maternity leave, etc. In 2019, 105 people were excluded. Employees who have been employed by the company for less than 4 months as well as persons who are on maternity leave or long-term leave, during the time of the performance evaluation are exempt. In 2019, due to administrative changes, no evaluation of the management staff was carried out.

Development Centres and Talent Management

From 2015 onwards, Nea Odos adopted the Development Centres methodology for all employees who run teams or will manage teams in the near future so as to create a pool of talented people with leadership skills that will fulfil its corporate vision. The Development Centres attract participants from all management levels and from all departments of the company, help to create new training programs that are part of the training plan of the Human Resources department and focus on the role of the manager, the challenges, the dynamics of the teams and the empowerment of the employees.

Objectives of Development Centres

- To identify talents at all levels of the organization and in all geographical areas
- To strengthen an environment of learning, high commitment and performance with an emphasis on growth, feedback and transparency
- The company to respond with respect to the needs and particularities of the employee
- To contribute to organizational change
- To improve the promotion and staffing processes of the company

Development Centres Entries

Geographical Area (Workplace)	Men	Women
Prefecture of Attica	-	1
Prefecture of Aetolia- Acarnania	1	1
Prefecture of Epirus	1	-
Total	2	2

Distribution of Development Centres Entries

Category/Ranks	Men	Women
Top Executives	-	-
Managers	-	-
Administrative Staff	-	-
Labour Staff	2	2
Total	2	2

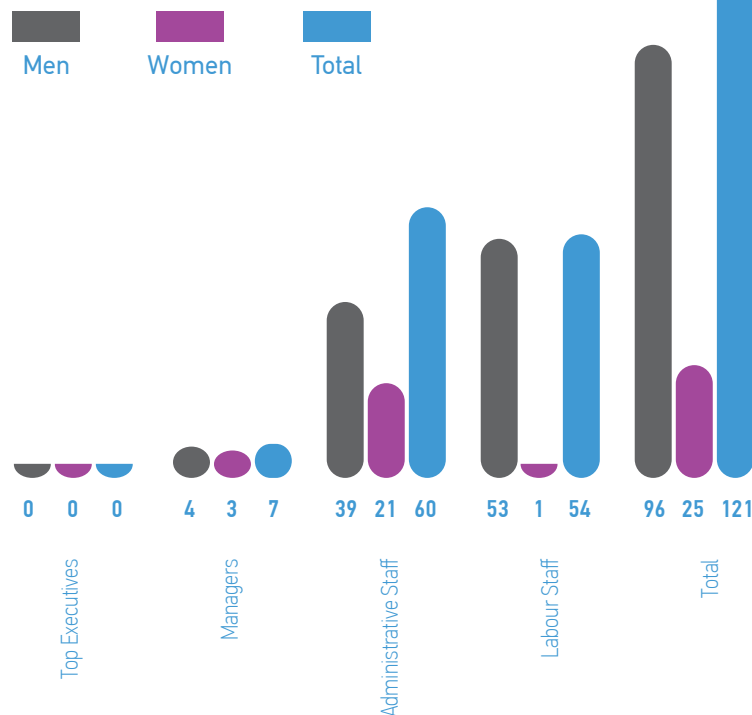
Investing in Knowledge

The continuous training and development of our employees has emerged as one of the key priorities of the company's strategy.

In 2019, a total of 50 programs were implemented, which were attended by 121 people (22.5% of employees) from all levels.

Employee Training and Skills Development

Participants



Training Hours by Human Resources Category

	Training Hours			Average Training Hours		
	Men	Women	Total	Men	Women	Total
Top Executives	-	-	-	-	-	-
Managers	59.5	308.5	368	6.61	61.70	26.29
Administrative Staff	1,209.5	600.5	1,810	15.12	11.12	13.51
Labour Staff	543	16	559	2.49	0.10	1.45
Total	1,812	925	2,737	5.83	4.09	5.10

Number of Programs Financed by the Company

Postgraduate Programs	1
Foreign Language Programs	1

2019

Training Hours by Topic	Training Hours	Number of Trainings
Health and Safety	855	18
Environmental Issues	60	5
IT/PC Operation/Systems	462	4
Human Resources Management & Leadership	665	8
Technical Issues	80	3
Electromechanical Equipment & Maintenance	405	7
Legal	164	2
Corporate Social Responsibility - Standards	8	1
Corporate Communication & Marketing	8	1
Other	30	1
Total	2,737	50

Official briefings/training for employees on human rights issues, as well as topics related to corruption and corporate governance, have not been included in the educational curriculum yet.

6.5 | Caring for Health and Safety at Work

The company is committed to meeting the highest standards at providing and maintaining a safe and healthy work environment and this is depicted in the implemented Health & Safety policy. All employees receive the necessary Health and Safety training and the relevant guidance, as well as all necessary protective measures as defined by the applicable Greek and European legislation, depending on their job role.

The company has adopted and implements the OHSAS 18001: 2007 International Standard, and uses all available tools to reduce, if not eliminate, risks to employees, motorway drivers and third parties associated with any of its activities. At the same time, Nea Odos sets priorities and implements programs to implement its policies and achieve its Health and Safety goals.

From 2018 onwards, the company has undergone a general review and modification of the reporting and investigation process as regards accidents at work. Identifying the causes that led to accidents and taking measures to prevent such future occurrences have shaped a new framework where all immediate actions of each employee involved in an accident at work are described as well as the way to investigate the accident by the Safety Officer.

Provisions on Health and Safety Issues

- Independent Health and Safety Advisers such as Safety Officers and Occupational Health Doctors who regularly visit all facilities of the company for the purpose of preventing and protecting employees from all forms of occupational risk.
- Free medical examination programs for all employees according to their job position and the risk category as defined in the Occupational Risk Assessment Study.
- Tetanus, Hepatitis A' and B' vaccinations to protect the employees of the motorway maintenance department.
- Group Health and Medical Care Program supporting employees and their dependents.

Health and Safety Indices				
Indices	2019	2018	2017	2016
Injury or accident rate of total staff (%)	1.12%	1.51%	3.07%	3.43%
Hours of absence/total work hours (%)	0.03%	0.07%	0.14%	0.14%
Accident frequency indicator	14.82	8.20	19.58	19.40
Accident severity indicator	39.53	108.63	216.56	215.13
Number of fatal accidents	0	0	0	0
Lost work days due to accident	40	106	177	122
Incidents without days of absence	9	0	6	3
Injury Rate (IR)	1.19	1.64	3.92	3.88
Lost Day Rate (LDR)	7.91	21.73	43.31	43.03
Absence rate (AR)	52.74	144.91	288.88	286.99
Total work accidents	15	8	16	11
Work accidents with days of absence from work	6	8	10	8

Through their supervisors, employees are officially represented in the Health and Safety Committee with a percentage that exceeds 75%. The team leaders inform top executives on Health and Safety issues, while keeping their subordinates informed of the management's decisions. The meetings take place at regular intervals, focusing on outstanding and new issues but also on the recommendations of Occupational Physicians and Safety Technicians for all activities and facilities of Nea Odos.

The Health and Safety Committee meets at regular intervals. One official meeting was held in 2019. The following position holders participate in the committee as representatives:

- Quality, Safety & Environment Manager
- Quality Management Assistant(s)
- Human Resources Manager
- Recruitment & Development Supervisor
- Senior EM Project Engineer
- Traffic Manager
- Winter Maintenance & Equipment Engineer
- Maintenance & Traffic Management Director
- Traffic Management Systems Engineer
- Toll Station Manager
- Operations Engineer

Health and Safety issues covered by agreements include the following:

- personal protective gear
- committees handling Health and Safety issues in which representatives of the management and the employees participate
- participation of employee representatives in Health and Safety inspections, audits and accident investigations
- training and education
- complaint submission system
- prerogative to refuse to do unsafe work
- planned inspections
- compliance with the Conventions of the International Labour Organisation (ILO)
- settlements or committees to resolve issues
- commitments on standards for performance goals or established practices

Training on Occupational Health and Safety

Topic	Training hours	Entries	Training hours /employee
Health & Safety Instructions	208	26	8
First Aid Principles & Instructions	184	23	8
Working Safely at Height	120	15	8
Evacuation of Buildings and Use of Fire Extinguishing Equipment	26	13	2
Restoring Damages Using Personal Protection Measures	130	26	5
ELOT Standard HD 384 - Electrical Installations Standard Requirements	96	6	16
Installation of Roadside Barriers	91	13	7
Total	855	122	-

Health and Safety Investment Categories

2019 (€)

Maintenance of the Administration Building Fire Safety System	2,666
Certifications (OHSAS 18001:2007, ISO 39001:2012)	2,900
Health and Safety Monitoring Program through Internal Inspections	16,000
Program for Measurement of Harmful Chemical Agents in Toll Stations	4,700
Measurements of Electromagnetic Radiation and Magnetic Fields at Workplaces	480
Insecticide-Rodenticide for the Administration building	796
Employees Medical Insurance	239,679
Occupational Physician/Safety Technician	18,636
Pharmacy Expenses/Medical Supplies	9,495
Total	295,352

Connection to the Sustainable Development Goals and Goal Setting



4. QUALITY EDUCATION



8. DECENT WORK AND ECONOMIC GROWTH



5. GENDER EQUALITY



8. DECENT WORK AND ECONOMIC GROWTH



10. REDUCED INEQUALITIES



16. PEACE, JUSTICE AND STRONG INSTITUTIONS



3. GOOD HEALTH AND WELL-BEING



4. QUALITY EDUCATION



3. GOOD HEALTH AND WELL-BEING

Topic	2019 Goal	2019 Progress	2020 Goal
Employee training	Total training hours/ total employees>5	Achieved. Total training hours/ total employees: 5.10	Total training hours/ total employees>5
Integrate Corporate Responsibility questions in the employee survey	The next survey is scheduled for the first half of 2019	Completed	The next survey is scheduled for the first half of 2021
Development centres	Further support and development of the employees participating in the development centres	Participation of 4 people in the development centers	Further support and development of participants in development centers
Health & Safety	Training on Health and Safety for new and existing employees	122 employees participated	Ongoing
	Emergency evacuation drills in all premises	Conducted drills in 11 of the 13 premises	Emergency evacuation drills in all premises
Annual Recertification	Annual Recertification: OHSAS 18001:2007	Completed	Transition to ISO 45001

7

CARING FOR THE ENVIRONMENT

Primary Sustainable Development Goals



12. RESPONSIBLE CONSUMPTION AND PRODUCTION

12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.

12.8 By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.



13. CLIMATE ACTION

13.1 Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries.

13.2 Integrate climate change measures into national policies, strategies and planning.

13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.

Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



6. CLEAN WATER AND SANITATION



7. AFFORDABLE AND CLEAN ENERGY



11. SUSTAINABLE CITIES AND COMMUNITIES



15. LIFE ON LAND



17. PARTNERSHIPS FOR THE GOALS

In 2019, Nea Odos:

invested over
€1 million
in environmental protection projects

conducted
126 noise measurements

recycled **16,334 kilos**
of materials from all its facilities

Nea Odos seeks to fully comply with the national and European legal and regulatory framework for environmental protection, setting an example of the fact that a major infrastructure project can achieve full harmonization with the environment. In this context, Nea Odos examines in depth all possible impacts on the environment and anticipates all possible scenarios in order to limit and effectively address any environmental impact it identifies. For the company, 2019 was the first year of implementation of its new environmental policy and the procedures that govern it. Environmental pollution mitigation measures of emergency incidents, which should be taken immediately by employees or subcontractors, as well as relevant remediation and decontamination guidelines have led to more efficient operations and better response in the event of an accident.

Environmental Policy and Management | 7.1



The company's new revised environmental policy emphasizes in:

- continuous employee training
- fulfilment of legislative obligations
- securing environmental permits
- implementation of pollution prevention programs
- effective management of raw materials
- minimization of waste accrued from the company's activities

For the implementation of our environmental obligations, we have adopted the Environmental Management System, certified according to ISO 14001, which is designed for the systematic observance of environmental legislation, the regular, on a monthly basis, inspection of environmental conditions, the continuous monitoring of environmental objectives and the analysis of environmental parameters and impacts, as well as for the strengthening of the environmental culture through the program focused on materials and waste recycling and management. In 2019, 228 environmental audits were carried out at the Nea Odos facilities.

In 2019, understanding the ever-changing needs as regards environmental issues, Nea Odos decided to update its Environmental Policy. In addition, the company reviewed the process related to the management of natural resources, materials and waste. The process was updated via the new recycling system of the company, and the relevant modifications and additions of necessary new brochures took place.

Finally, it is worth noting that Nea Odos carries out regular controls and checks regarding its Operation and Maintenance subcontractors on their environmental certifications and compliance with environmental conditions. From the inspections and controls carried out in 2019, no negative environmental performance was recorded.

Impact from our Operations | 7.2



Achieving Environmental Sustainability has been a key goal since the design phase of the project. Nea Odos recognizes the extent of its impact on the natural environment and seeks to reduce its environmental impact and curb and mitigate climate change by implementing an integrated strategy aimed at achieving the harmonization of motorways with the environment, without disrupting its balance. At the same time, however, the effects of climate change and the severity of weather phenomena affect the operation of the road network and create increasing needs for invasive maintenance work, infrastructure inspections and traffic congestion management. The above actions imply temporary suspension of the operation of the toll stations with negative financial projections, as well as negative reputation for the company.

In 2019, no problems of environmental degradation from the operation and maintenance of the motorways have been identified, nor have any relevant fines been imposed on the company.

Training on Environmental Topics

Topic	Training hours	Entries	Training hours /employee
Environmental Management in the Concession Project (Environmental Terms, Actions, Measures and Monitoring)	60	24	2.5



Energy Consumption

The main energy source used for heating our buildings and lighting our facilities continues to be electricity.

The photovoltaic system that has been installed on the roof of our offices in Varibobi was connected to the network in the summer of 2019. The electricity generated and returned to the distribution network is estimated at 4,444 kWh.

Energy Consumption (kWh)	2019		2018		2017
	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Electric energy for road lighting and buildings	32,919,562.02		33,043,904.61		27,075,683
Solar energy (for ERTs and irrigation)	19,224	10,500	19,224	11,813	60,761

Conversion factors: diesel fuel: 36.4 MJ/l, gasoline: 44 MJ/l, LPG: 46 MJ/l, liquid gas: 46 MJ/l, natural gas: 47.2 MJ/l

Electricity from solar panels in the administration building | 4,444 kWh

For the Nea Odos operational needs, fuel is mainly used for the company's fleet of vehicles that uses Diesel engines for optimal fuel usage.

Fuel Consumption (Litres) Nea Odos	2019		2018		2017
	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Gasoline	-	-	-	-	5.743
Diesel (Fleet)	668,848.7		637,684.26		525,932*
* Includes Diesel from generators					
Fuel Consumption (Litres) Subcontractors	2019		2018		2017
	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Gasoline	19,703.06	6,451.00	15,294.03	12,080.72	27,783
Diesel (Fleet)	496,559.09	166,203.00	353,041.64	276,067.66	593,010
LPG	69,300.00	-	78,320	37,200	111,000



Raw Materials and Equipment

To ensure the efficient management of raw materials and equipment as well as for the preservation, protection and saving of natural resources, Nea Odos strictly adheres to the Authorised Environmental Terms of the Concession Project.

In the following table, the basic categories of raw materials and equipment necessary for our operation are presented.

Use of Raw Materials and Supplies Nea Odos

Categories of raw materials and supplies	Material	2019		2018		2017
		A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS (A.Th.E.)
Raw Materials	Sawdust (Kg)	3,890	400	3,400	900	4,350
	Printing paper (Kg)	5,199		8,570.03		10,875
	Paper (paper thermal rolls)	27,248		25,101.25		12,256
	Ink/Toners (pcs)	168		135		126
Other	Transponders (pcs)	21,050		21,500	10,000	31,250

Use of Raw Materials and Supplies Subcontractors

Categories of raw materials and supplies	Material	2019		2018		2017
		A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS (A.Th.E.)
Raw Materials	Salt (Kg)	8,775,480	4,230,000	2,310,070	1,406,870	4,988,238
	Sawdust (Kg)	-	1,650	150	300	200
	Printing paper (Kg)	328	2	430	15	290

Concerning printing paper needs, we purchase eco-friendly printing paper produced according to internationally certified production process.



Waste Management

Nea Odos ensures compliance with environmental terms, regarding raw materials, equipment and waste management. Through the internal process of regular inspection and recording of relevant data in Electronic Waste Register, according to the legal framework in force, Nea Odos records precisely the waste data that is presented in the following tables. The increase in the amounts of lamps and computers/electrical appliances/equipment was due to the fact that now all the facilities have special recycling bins for Electrical and Electronic Equipment Waste.

Waste Management Table Nea Odos

Categories of waste	Material	2019			2018			2017
		Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS (A.Th.E)
Semi-manufactured goods or parts	Lightbulbs (Kg)	450	330	120	10	10	-	167
	Mixed batteries (Kg)	30	30	-	17	17	-	7
	Batteries (Lead - Acid) (Kg)	3,227	2,817	410	630	540	90	1,510
	Spare parts (cables) (Kg)	-	-	-	-	-	-	242
	Computers/Electrical appliances/Equipment (Kg)	2,509	2,411	98	122	122	-	843
	Patrol Tires (Kg)	5,128	3,838	1,290	8,459	7,904	555	9,315
	Leased vehicles' tires (Kg)	620	620		-	-	-	-
Mixed waste	Engine gear box and lubrication oils (Lt)	3,201	1,729	1,472	3,465	2,015	1,450	2,441
	Leased vehicles' lubrication oils (Lt)	184	184		-	-	-	-
Other	Ink/Toners (pcs)	87 pcs and 44 Kg	87 pcs and 44 Kg	-	95	95	-	-
	Discarded chemicals (Kg)	-	-	-	100	100	-	-
	Contaminated soil (Kg)	-	-	-	37,770	-	37,770	-
	Contaminated absorbent materials (Kg)	-	-	-	1,588	-	1,588	-

* Refers to the tanker incident that took place in 2018

The company's subcontractors collect the waste generated during the operation and maintenance of the motorways and transport it to approved sites or to special waste collection points provided by the official alternative management systems.

Waste Management Table: Subcontractors

		2019			2018			2017
--	--	------	--	--	------	--	--	------

Categories of waste	Material	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS (A.Th.E)
Raw materials	Iron and steel (barriers, signs) (Kg)	92,040	78,380	13,660	54,150	32,000	22,150	74,740
	Plastic (barriers, signs) (Kg)	-	-	-	260	260	-	140
Semi-manufactured goods or parts	Lightbulbs (Kg)	60	60	-	775	775	-	-
	Batteries (Lead -Acid) (Kg)	1,786	66	1,720	-	-	-	960
	Tires (Kg)	5,950	5,950	-	-	-	-	6,600
Mixed waste	Engine gear box and lubrication oils (Lt)	2,282.90	2,282.90	-	4,349.25	2,949.25	1,400	3,934
	Animal tissue waste (Roadkill) (Kg)	4,050	1,770	2,280	5,030	1,730	3,300	940
	Mixed municipal waste (Kg)	509,790	255,780	254,010	426,816	255,276	171,540	278,879
Other	Cuts residues (Kg)	67,730	65,000	2,730	62,600	62,600	-	65,000
	Rockfall (tonnes)	7,946.76	-	7,946.76	-	-	-	-
	Concrete (tonnes)	4,866.29	4,866.29	-	-	-	-	-
	Milled asphalt (tonnes)	4,486.35	4,486.35	-	-	-	-	-
	Mixture of construction waste (tonnes)	161.71	161.71	-	-	-	-	-

Nea Odos does not import, export nor processes waste that is deemed hazardous. Regarding the management of water discharges and especially as regards Ionia Odos, the company fully complies with the decisions of the Ioannina Region on municipal, non-hazardous, liquid wastewater and potential wastewater discharges in water bodies that are not a habitat of high biodiversity value and are not governed by any protection regime. This involves the "Ammotopos --Kampis Springs" stream of constant flow, also known as "Rema Mana". More specifically, in the Filippiada Motorist Service Station of the Ionia Odos motorway, the management of water discharges resulting from the Motorist Service Station operation, is completely controlled and is carried out according to the environmental regulations and terms under which the environmental permits of these facilities have been obtained. In particular, treated wastewater resulting from biological treatment is used for irrigation, cleaning of the surrounding area and firefighting.



Recycling

The protection of the environment was and is a strategic goal of Nea Odos, as well as one of the main pillars on which the Corporate Responsibility initiatives of the company are based.

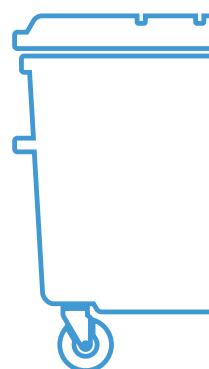
The **Boosting Recycling Initiative** is an initiative to redesign the recycling system in order to improve recycling (a) by achieving a higher percentage of diversion of materials from mixed waste; (b) by including new flows of recyclable materials and (c) gradually cover the entire concession project.

By continuing in 2019 the implementation of the **Boosting Recycling Initiative**, we managed to recycle 17,445 kg of materials, while the expansion of the recycling system for drivers was completed with the installation of bins for recycling plastic, glass, aluminium, tins and paper at all parking areas with toilets along the motorways.

Specifically:

The number of bins (units) placed according to the provisions of the new system (the placement of the bins started at the end of 2018 and was completed in 2019) are as follows:

- bins for recycling batteries: 11
- lead battery bins: 6
- waste bins for Electrical and Electronic Equipment: 19
- bins for recycling lamps: 19
- 20 litre blue office trash bins: 101
- 20 litre yellow office trash bins: 101
- 660 litre blue bins: 60
- 1,100 litre yellow bins: 16
- 770 litre green waste bins: 14



Investment in the Boosting Recycling Initiative | €49,780

The following results are a proof of the commitment of all employees of Nea Odos to the common goal of protecting the environment, but also a commitment to continue the efforts and ensure even more impressive results in the coming years.

Recycling in all company facilities



Recycling (kg)	2019			2018		
	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS
Paper	7,394	7,114	280	870	870	-
Packaging materials (Plastic, glass, aluminium, tinplate)	10,051	8,681	1,370	2,080	2,080	-
Total	17,445	15,795	1,650	2,950	2,950	-

- state-of-the-art watering systems for greenery watering within the boundaries of the Concession project.
- cooperation with an ISO 14001: 2004 certified subcontractor for the planting and maintenance of green areas on premises and along the motorway.
- installation of taps with an automatic flow-stop system in all areas of the Motorist Service Stations of A.Th.E., and Ionia Odos motorways.
- reuse the treated wastewater from the Motorist Service Stations biological treatment units to meet the needs for irrigation, cleaning the surrounding areas and firefighting.

The total water consumption/use required for the activities of Nea Odos in 2019 amounted to 372,029 m³. More, analytically:

	2019		2018		2017
Water Consumption NEA ODOS (m ³)	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS (A.Th.E.)
Water Consumption (Buildings & Facilities – EYDAP)	1.938	–	1.961	–	2.987
Drinking water (bottles)	68.40	22.80	63.26	17.67	79
Water from other sources (from drilling)	150,000*	220,000*	–	290,000	131,633**

* In 2019, irrigation was added to SCADA, which allowed us to have a clear picture of water consumption. It includes 5,077 m³ of water from a temporary drilling grant to the Ioannina Basin Water Supply Association (Municipal Service).

** This represents the quantity consumed since the start of the Ionia Odos operation in September 2017 and includes consumption for the operation and construction of the motorways.

	2019		2018		2017
Water Consumption Subcontractors (m ³)	A.Th.E.	IONIA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS (A.Th.E.)
Water Consumption (Buildings & Facilities – EYDAP)	–	–	–	–	–
Drinking water (bottles)	6.00	2.16	6.10	–	1
Washing water (from drilling) (litres)	–	–	–	–	–

Managing Air Pollution

Effectively managing air pollution and mitigating its negative impacts constitute our priorities. Air pollution measurements are carried out systematically on a 24-hour basis and the recording system communicates with analysts to calculate within 5 minutes possible exceedances of the limits set by the legislation on average primary pollutant emission values and parameters (CO, CO₂, NO, NO₂, SO₂, O₃, TSP, PM10, PM2.5, C₆H₆ (Benzene), C₇H₈ (toluene) and xylene).

Below are the values from the Ionia Odos air pollution measurement network which includes 3 stations: the Motorist Service Stations of Evinochori, of Filipiada and of Episkopiko.

According to the measuring station data recorded in 2019 for A.Th.E. and Ionia Odos, no atmospheric pollution above the permitted limits was recorded and, henceforth, measures to decrease pollution were not taken.

Average Annual Rates 2019

Air Pollution Measurements	A.Th.E.			IONIA ODOS			Limits
	Varibobi	Schimatari	Arkitsa	Evinochori	Filipiada	Episkopiko	
NO ₂	39.71	19.17	28.44	6.58	12.81	10.62	40 µg/m ³
C ₆ H ₆ (benzene)	0.63	0.03	0.00	0.09	0.25	0.17	5 µg/m ³
CO	0.77	0.29	0.89	0.33	0.29	0.32	There was no exceeding the maximum daily eight-hour rate (10 mg/m ³) at any station
SO ₂	2.12	3.82	3.78	2.18	1.82	2.37	125 µg/m ³ average daily value should not be exceeded more than 3 times per year
Particulate matters PM2.5	11.67	11.36	9.87	10.01	8.68	10.48	25 µg/m ³
Particulate matters PM10	19.32	16.61	13.91	14.32	11.71	15.44	40 µg/m ³
O ₃	16.85	36.83	39.55	-	-	-	There was no exceedance of the maximum daily eight hourly rate (120 µg/m ³) and no exceedance > 25 times per year at any station

At the A.Th.E. facilities, the total amount of FREON (R410A and R22) used by air conditioners was 256.6 litres in 2019 (301.4 litres in 2018). In 2019, 64 air conditioning units using FREON R410A were replaced with new ones using Freon R32 types. At Ionia Odos, non-ozone depleting substances are used, based on Regulation (EC) no. 1005/2009.

Greenhouse Gas Emissions (GHG)

For 2019, the direct and indirect total Greenhouse gas emissions amounted to 20,779.1 tonnes of CO₂ equivalent.

Total CO₂ Emissions (tonnes)

Emission sources	2019	2018	2017
Direct emissions* from fuel consumption from own fleet (scope 1)	1,784.5	1,701.3	1,406.1
Indirect emissions** from electricity consumption (scope 2)	18,994.6	20,123.7	18,430.7
Total	20,779.1	21,825.1	19,836.8

*Direct emissions sources for Nea Odos: fuel consumption (diesel, gasoline) from own fleet (scope 1)

**Indirect electricity sources for Nea Odos: third-party electricity purchase, which serves all the company's operations (buildings, toll stations, road lighting).

Emission factors:

Diesel*: 0.002668 tCO₂/l

Electric energy**: 0.577 tCO₂/MWh

* Revised IPCC Guidelines for National Greenhouse Gas Inventories. IPCC (2006)

** European Residual Mixes 2019 (Association of Issuing Bodies)

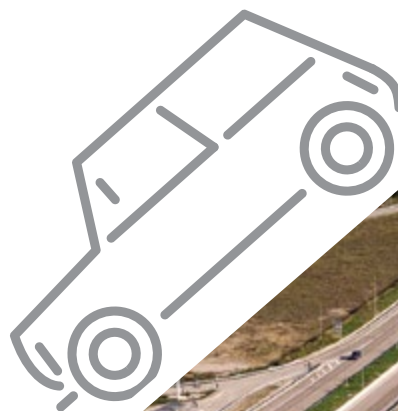
Intensity = 20,779.1/537=38.69 tCO₂/employee

Intensity = 20,779.1/379=54.83 tCO₂/motorway km

In order to reduce the environmental impact of employee and product transport, the company organizes eco-driving trainings for its employees and uses power fleet software through which it can control at any time the data of each vehicle. Thus, all vehicle services are carried out in a timely manner and at certified garages, thereby reducing the environmental impact of any possible mechanical malfunction. Also, the vehicles of the corporate fleet use oil (Euro5 and later technology) as fuel aiming at the least possible release of pollutants into the environment.

	2019		2018	
Nea Odos Vehicles Mobility	Own	Leased	Own	Leased
Corporate vehicles	51	66	55	65
Kilometres covered	4,633,044	2,358,413	4,257,972	2,837,612

	2019		
Corporate Fleet Mobility	Total	A.Th.E.	IONIA ODOS
Kilometres covered by the corporate fleet	4,633,044	2,366,335	2,266,709
Corporate fleet vehicles	51	30	21
Kilometres covered by patrol vehicles	3,571,162	1,897,726	1,673,436
Patrol vehicles	27	17	10
Kilometres covered by intervention teams' vehicles	1,061,882	468,609	593,273
Intervention teams' vehicles	24	13	11





Road Traffic Noise

A motorway operation can cause noise pollution at the areas adjacent to the motorway and thus, Nea Odos runs an annual Road Traffic Noise Monitoring program that includes noise measurements along the motorway in noise sensitive areas that have been approved by the relevant state agency in charge.

In 2019, a total of 126 24-hour noise measurements took place:

- 46 noise measurements at the A.Th.E., at the Metamorfosi - Logos section of which 6 concerned complaints/grievances
- 23 noise measurements at the A.Th.E., at the Loggos - Skarfia section of which 5 concerned complaints/grievances
- 3 noise measurements at the A.Th.E., connector branch, at the Schimatari - Chalkida section
- 54 noise measurements on the IONIA ODOS, motorway, at the Antirion - Ioannina section of which 2 concerned complaints/grievances

Regarding A.Th.E. :

- in the area of Kifissia, approximately at the 21st kilometre with direction to Athens, a noise barrier of 491m² dimension was installed according to the provisions of the relevant study for the Application of Noise Barriers as approved by the state,
- in the end of 2019, a study for the Application of Noise Barriers was completed, regarding the 65th kilometre with direction to Athens. The study approval and noise barriers installation are set to be completed during 2020.

No exceedances of the permissible noise limits were observed on the Ionia Odos, so no additional measures were required.

It is also noted that Nea Odos takes all necessary measures to comply with the maximum permissible noise limits and that within 2019 no relevant fine was imposed on the company. More information regarding acoustic measurements is available at the 2019 Environmental Report, on the company's website.



Biodiversity

Nea Odos implements prevention and early response measures in sensitive areas, contributing to the conservation, protection and restoration of ecosystems and habitats. The Concession project was based on Environmental Impact Studies for the planning and alignment of the motorway axis, which recognised the natural wealth of the area and its ecologically sensitive parts:

A.Th.E. Motorway:

- Yliki and Paralimni Lakes – Voiotikos Kifissos System
- wetland and islands of Atalanti Bay
- Spercheios valley and estuary

- Achelous Delta, Messolongi, – Aitoliko Lagoon, estuary of River Evinos, Echinades Islands, Petalas Island
- Mount Varasova
- Mount Arakynthos and the Strait of Kleisoura
- Ozeros Lake
- Amvrakia Lake area
- Amvrakikos Gulf, Katafourko Lagoon and Korakonisia
- Louros and Arachthos Rivers

Wetlands and rivers are part of the Natura 2000 network and form the areas at large the project crosses through or is adjacent to. In 2019, no fines were imposed on Nea Odos regarding the observance of the environmental terms of the Concession project, nor was any incident recorded with negative effects on the ecologically sensitive areas of our motorways under our responsibility.

At the same time, the company applies the Environmental Terms of the Concession project related to biodiversity and fauna protection. This is achieved through a series of actions which include:

- fauna passes
- plantings with native species
- maintenance and increase of green in motorways
- fencing maintenance as well as improvement (e.g., height increase) where necessary



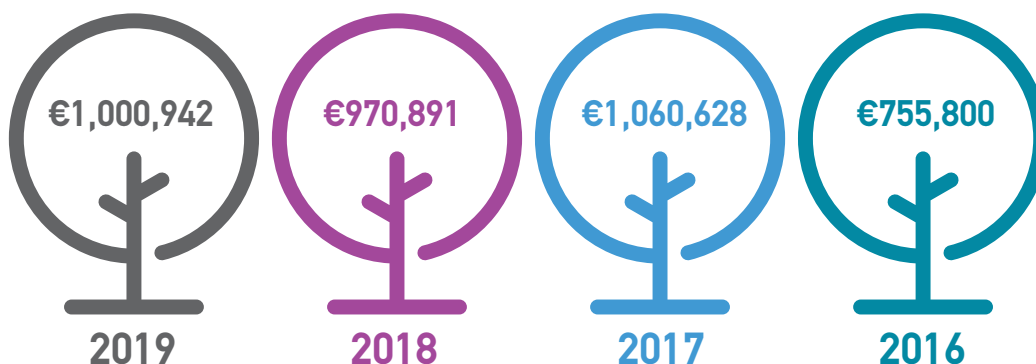


7.3 | Investing in Environment Protection

At Nea Odos we systematically seek to adopt actions for environmental protection and management. In 2019, the total expenditure approved and invested in environmental initiatives exceeded €1 million.

Environmental Protection Projects	Investment (€)
Environmental Studies (MPE, TEPEM, Recycling Studies, Approval of Environmental Terms, Environmental Licensing of Escorting projects and activities, etc)	28,810
Protection and maintenance of green spaces	724,943
Traffic Noise Monitoring Program	16,000
Environmental consultants and employees for monitoring the application of Environmental Terms	33,000
Operation of atmospheric pollution and meteorological data stations	55,547
Certifications	1,600
Waste management	29,759
Environmental education and training Design and installation of sound curtains	248
Noise barriers studies and installation	111,035
Total	1,000,942

Environmental Protection Investments



7.4 | Environmental Awareness Projects

The construction and operation of motorways has undeniable social and economic value, but at the same time involves significant environmental responsibility. For this reason, Nea Odos is not limited to its contractual and legal obligations such as environmental impact assessment, but actively contributes to raising the awareness

of stakeholders, including drivers/users, local communities, workers and educational communities. In 2019, we undertook, in a broader effort to culture change and to promote environmental awareness, initiatives and actions concerning:

- **Distribution of paper bags:** For the fifth consecutive year, in the context of “We All Together Can” of the SKAI TV and radio station, we distributed a total of 20,000 paper bags for waste collection. The action took place during the period of Easter and summer at the tolls of Afidnes.

- As part of the initiative for the redesign of the recycling system, instructions for material recycling and waste management were sent to the heads of recycling at all company’s facilities and to all staff of the Eritrea Administration building. At the same time, recycling tips were posted in public areas. In addition, in 2019, trainings on Environmental Management in the Concession Project (Environmental Terms, Actions, Measures and Monitoring) took place. The seminars were held for executives/ engineers at various facilities of the company by the director of the Department of Health and Safety and Environment.

Connection to the Sustainable Development Goals and Goal Setting



Topic	2019 Goal	2019 Progress	2020 Goal
Annual Recertification	Annual Recertification: ISO 14001:2015	Completed	Annual Recertification: ISO 14001:2015
Measurement of CO ₂ emissions (Offices)	Measurement of CO ₂ emissions (Offices)	Completed	Measurement of CO ₂ emissions (Offices)
Operation and maintenance activities	Zero fines	Achieved	Zero fines
Green Motorist Service Stations	Install fast charging stations for electric vehicles along the motorway	Completed	
Recycling	Restructure and expansion of the recycling program	Completion of restructuring and introduction of the Boosting Recycling Initiative	
Wildlife management	The design of the program is ongoing, and its completion and implementation is expected in 2020	The design of the program is ongoing, and its completion and implementation is expected in 2020	
Environmental protection	Average number of audited premises per month to be over 10	27 audited premises per month on average (include both Nea Odos and Kentriki Odos)	Average number of audited premises per month to be over 10

8

COLLABORATION WITH LOCAL COMMUNITIES AND SOCIAL CONTRIBUTION

Primary Sustainable Development Goals



17. PARTNERSHIPS
FOR THE GOALS

17.17 Encourage and promote effective public, public private and civil society partnerships, building on the experience and resourcing strategies of partnerships.

Secondary Sustainable Development Goals



1. NO POVERTY



3. GOOD HEALTH AND
WELL-BEING



4. QUALITY
EDUCATION



11. SUSTAINABLE CITIES
AND COMMUNITIES



16. PEACE,
JUSTICE AND STRONG
INSTITUTIONS

In 2019:
almost 61% of our suppliers
originate from the local communities around the motorway

almost 65% of our employees
reside outside the Attica prefecture

we invested €250,000
in "Proodos" campaign



8.1 | Our Contribution to Social Development

Contributing to Social Development is an integral part of our philosophy. In Nea Odos, we actively support the local communities that are adjacent to our project and strengthen their economic development by implementing long-term programs and specialized initiatives. We give priority to local communities, NGOs and other important strategic partners for the development of initiatives and the continuation of programs that add measurable value, both locally and nationally.

In 2019, the contribution of Nea Odos amounted to €101,167.7 thousand

Annual contribution to Social Development - Social Product (in th. €)	2019	2018	2017	2016	2015
Payments to suppliers (except materials and intercompany transactions)	62,292.52	63,841.57	65,973.53	66,644.03	27,661.34
Employee salaries and benefits (including insurance contributions)	12,355.93	12,119.37	8,906.90	6,619.37	7,648.36
Payments to providers of capital	25,597.16	33,275.28	8,488.48	6,798.66	6,984.83
Actions, financial support, donations and Corporate Social Responsibility Structures	922.09	631.93	467.82	272.56	259.71
Total	101,167.7	109,868.15	83,836.73	80,334.62	42,554.24

The “Proodos” Campaign» | 8.2

In 2019, aiming at comprehensive and effective awareness raising of the public about the priorities, performance and outcomes of our Corporate Responsibility pillars, Nea Odos implemented the campaign entitled “Proodos” (Progress). The nationwide campaign was broadcast on radio and websites of national and local focus as well as in the Sunday press.

The campaign took place in two stages. During the first stage, priority was given to information dissemination, with the key message “Nea Odos means progress” and with reference to key figures/ numbers regarding Nea Odos’ contribution to the environment, economy, people and society. In the second half of 2019, the second stage was implemented with the message “Lead the progress with one click”. In this phase, we offered the opportunity to the public to choose, from a series of initiatives, those they considered important in order for us to implement.

Actions to Vote on

- Future Drivers
- Safety for all
- Online Education
- Safety Pit Stop

Road Safety

740
votes

- Unemployment Reduction
- Internships
- Supporting tourism

Economic Growth

622
votes

- Emissions Reduction
- Integrated recycling

Environmental Protection

609
votes

- Child Abuse
- Supporting Social Supermarket
- Yes to sports!
- Yes to culture!

Social Contribution

563
votes

Most Popular Action

38% of the votes

Future Drivers: Education and awareness programs in primary schools in collaboration with the Road Safety Institute “Panos Mylonas” - I.O.AS.

46% of the votes

Unemployment Reduction: Funding of training and retraining programs for the unemployed.

64% of the votes

Integrated recycling: Creation of a wholistic recycling mechanism for staff and drivers/ users along the entire length of the motorways.

43% of the votes

Child Abuse: Child abuse awareness activities. Activities related to the management child abuse incidents in collaboration with the ELIZA association.

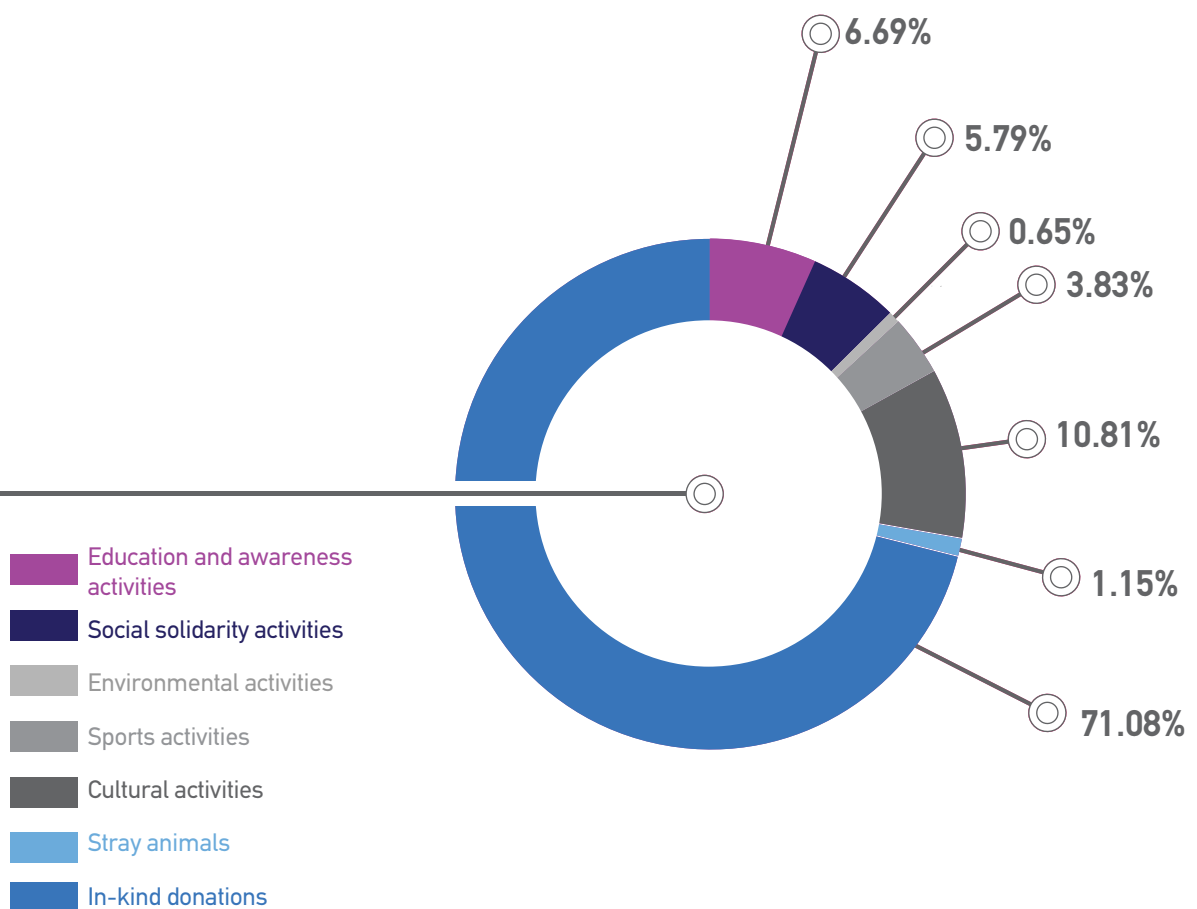
Total votes by the public: 2,534

8.3 | Our Key Priorities

The main priorities in 2019 covered the following areas:

- education and awareness activities
- social solidarity activities
- environmental activities
- sports activities
- cultural activities
- stray animals
- in-kind donations

In 2019 our total investment in our priority areas amounted to €627,938 (€564,731 in 2018)



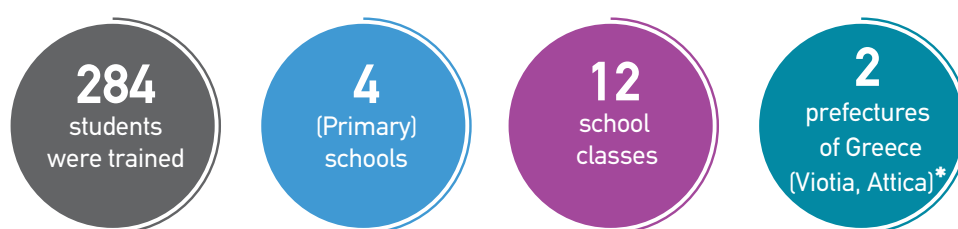
Road Safety Training and Awareness Activities

In collaboration with the "Panos Mylonas" Road Safety Institute we implement a series of interactive awareness and training programs, with the main one being the **"Cycling Safely"** program. Our investment for education and Awareness Activities implemented in 2019, includes part of the investments for activities that were contracted and priced in 2018, but were implemented in 2019. Therefore, the financial investment in educational and information actions for road safety appear increased.

Cycling Safely

The program aims at shaping a responsible road driving behaviour of children that will influence their mentality and behaviour as adults. The program has been approved by the Ministry of Education, the Institute of Educational Policy, and it is always implemented with the cooperation of the competent Directorates of Primary Education.

During the educational program (February 2019)



*83.2% of the students came from Attica and 16.8% from Viotia.

Comments of students who participated in the program:

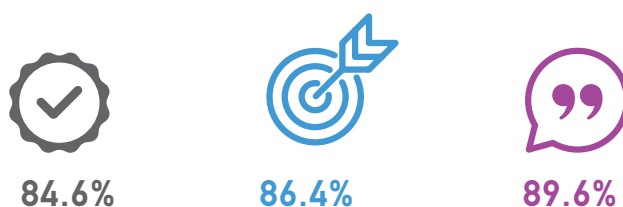
«I liked the games because they gave us knowledge»

«I liked the fact that they showed us how to wear a helmet»

«I learned to move safely»

«I learned the dangers of cycling»

Assessment of the Educational Program by Teachers



Overall satisfaction with the program

Program catering to goals and expectations

Quality and content of lectures

At the same time, in 2019, we proceeded to the creation of information material for road safety, such as leaflets, posts on websites as well as video recordings of relevant actions.

Investment worth of €42,022.69 (€19,218 in 2018) in Road Safety educational and awareness activities



Welfare and Social Solidarity Activities

At Nea Odos, our concern is to upgrade the quality of life of the residents in the areas bordering the motorways of our responsibility. In this context, we continue to strengthen social solidarity initiatives for vulnerable social groups, implemented by local entities.

In 2019 we supported associations, organizations, charities, associations and non-profit organizations by covering specific or permanent needs with financial donations. We mention indicatively the following:

- social grocery stores (of Konitsa, Thermou, and Parga)
- volunteer fire brigades Groups of Rodopi and Agios Stefanos
- Patras Development Conference
- Ark of the World
- Together for the child
- ELEPAP of Agrinio
- Alcyoni
- Iliachtida
- PIKPA of Voula

Additional Activities:

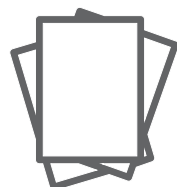
Nea Odos in collaboration with "The Smile of the Child" organization has installed piggy banks at the Motorist Service Stations for anonymous donations.

Investment worth of €36,328.46 (€24,547 in 2018) in welfare and social solidarity activities, with the aim of supporting bodies that care for vulnerable social groups.

Our Cooperation with the "ELIZA" Association

Nea Odos continued to support the activities of the NGO, ELIZA which focuses on child abuse. In 2019 we supported the evaluation of the "Action of Physical Abuse Prevention of Preschool Children" that took place in 11 Cities in collaboration with local paediatricians and hospitals. The Society against Child Abuse - ELIZA is a specialized Non-Profit Organization founded in Greece in 2008 with the sole purpose of protecting and promoting the rights of children who have suffered or are at risk of abuse or neglect.

Assessment of Action for the Prevention of Physical Abuse of Preschool Children in 11 Cities






28,000



11



98

-  Copies-publishing donation
-  Cities
-  Paediatricians

In-Kind Donations

We continue to support people with special needs and vulnerable groups by granting toll free passes worth €446,335.15 and support institutions, groups and associations in need.

In addition, we support organizations, vulnerable groups and associations in need by granting toll free passes and toll free passes for special needs vehicles. In 2019 Nea Odos offered 165,065 free toll passes for vehicles for people with special needs.

Evident Support for the Disabled	2019			2018			2017
	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS	A.Th.E.	IONIA ODOS	Total NEA ODOS
Free of charge passes of special needs vehicles	165,065	116,003	49,062	152,530	110,576	41,954	106,158
Investment (€)	443,500	323,126.73	120,373.27	406,029.40	303,858.59	102,170.81	353,759.7

In 2019, Nea Odos offered a total of 503 toll free passes (an investment worth €2,835.15) for vehicles of organisations conducting social work. Specifically, the company supported the:

- The Smile of the Child" organization
- teaching staff of the 1st Eleonas Thivon Second Chance School
- selected Special Missions Team
- staff of the "ACHILLOPOULIO" General Hospital of Volos

Cultural Activities

"Cultural Route of Ancient Theatres of Epirus" program

Nea Odos strengthens its participation in initiatives that promote and protect the local cultural heritage, supporting its goal of the harmonious integration of motorways in the physical environment and the growth potential of local communities. In 2019 we continued supporting the "Diazoma" Association and its "Cultural Route of Ancient Theatres of Epirus" program which is the largest recent developmental initiative for the Prefecture of Epirus. In this context, we undertook initiatives such as:

- the digital panorama to highlight cultural and environmental points of interest
- the Interactive Digital Information Station (info kiosk) with a pilot application at the Sirios Motorist Service Station
- funding a study for the Epirus Local Cultural Development Agreement so as to integrate the cultural path into the modern social and business landscape and link the local private sector to the "Cultural Route of Ancient Theatres of Epirus" program

Cultural Audio Tours

In collaboration with Clio Muse, and aiming at promoting to the general public destinations that are adjacent to our motorway, Nea Odos implemented the creation of 15 cultural audio tours for smartphones that reveal unknown aspects of new, dynamic destinations connected to the Ionia Odos and the A.Th.E.

The tours include 15 walking trails and 4 road trips in Nafpaktos, Messolongi, Agrinio, Amfilochia, Vonitsa, Astakos, Preveza, Arta, Filippiada, Ioannina and Dodoni with the aim of highlighting 154 important monuments through 489 stories, focusing on their history, tradition and other lesser known aspects of their culture.

The routes are available in English and Greek, and accessible online and offline through the [Clio Muse](#) app.

Supporting local Cultural Festivals and Exhibitions

In 2019 we had the opportunity to collaborate with and support significant for the local communities' events such as the:

- Vovousa Municipality Music Festival
- festival of the Dodoni Municipality
- food Festival of the Ziros Municipality
- Ziros Lake Festival

Supporting cultural activities amounted to €67,850 (€80,350 in 2018) for the support of initiatives by private entities and local government.

Sports Activities

In 2019 we continued supporting activities that promote the social role of sports, support local institutions and actively support young athletes in local communities.

Nea Odos invested in total €24,086.80 (€25,096.5 in 2018) in supporting athletic activities and sports clubs and in particular at the local level we supported the following initiatives:

- The cycling races of Nafpaktos
- PAE Panetolikos
- The Akraifnio Cycling Race
- The "Messolongi 2008" Women's Football Club
- The Ioannina Yachting Club
- The Amazons (Women's Volleyball Team of Nea Erythrea)
- Keravnos of Thesprotikos
- The Akraifnia Run Race
- The Run Race of Kastro
- 2019 Posidoneia
- The Greek Paralympic Committee

Taking Care of Stray Animals

In the framework of the safe, and smooth traffic flow, Nea Odos has installed, and manages a fencing along the motorway, with special wire netting, for the protection of both animals and drivers.

At the same time, the company intensified its efforts to collect and manage stray animals in collaboration with the Animal Welfare Society.

In 2019, Nea Odos continued to provide vet protection and care for stray animals in collaboration with the Animal Welfare Society, amounting to €7,215 (€9,490 in 2018).

More specifically, in 2019, the company took care of and covered the medical expenses of 61 stray animals with the investment in 2019 amounting to more than €7,000 and the mean average for each stray to €118. Additionally, 6 out of the 61 animals that have been cared for by the Greek Animal Welfare Society have now been adopted. Almost all animals were hosted to heal before being transferred or adopted in a specially constructed area that we have created.

Corporate Social Responsibility Structures | 8.4

Improving our internal structures and our participation in international organizations and educational conferences are requirements for implementing our Corporate Social Responsibility activities. Targeted communication activities also contribute to the improvement of our Corporate Social Responsibility activities. In 2019 we invested a total of **€294,152.35** for this purpose, an amount that includes our investment in the "Proodos" campaign.

Investing in Strengthening Corporate Social Responsibility (in €)	2019	2018
Corporate Strategy	13,435	16,900
Event Participations and Collaborations	29,419.35	33,649.35
Communication	251,298	16,650
Total	294,152.35	67,199.35

Ethics and Corporate Communications | 8.5

In corporate communications, as in all aspects of our business activities, we follow and incorporate changes in the current legislation as well as best practices in communicating and promoting both our services and our social and sponsorship initiatives. In this context, we commit to and comply with the Greek Advertising/ Communications Code of the Communications Control Council that defines the rules of business ethics and ethical behaviour that have to be respected as regards the citizen-client. In 2019, there were no incidents of non-compliance during the implementation of the Nea Odos' communication strategy. Respectively, no issues were raised regarding the communication of our services and our social-sponsorship initiatives.



Connection to the Sustainable Development Goals and Goal Setting



Topic	2019 Goal	2019 Progress	2020 Goal
Blood bank	Repeat blood collection drives for employees of the ATHE motorway, and expand to the new motorway sections	3 blood collection drives took place in 2019	Repeat blood collection drives
Stray animal management	Maintain and strengthen collaboration with the Greek animal welfare society	Ongoing	Maintain and strengthen collaboration with the Greek animal welfare society
Strengthening partnerships	Ongoing	Collaborate with "Eliza", Diazoma and other organizations Support the Observatory of Road Networks in Western Greece and Peloponnese (POADEP)	Develop the "Diadromes" platform
E-Learning platform dedicated to Road Safety	Initiate the content development of the platform in order to pilot in 2020	Goal moved to 2020	



The Nea Odos Corporate Responsibility Report for 2019 is the company's 6th Annual Report. It covers the period from 1/1/2019 to 31/12/2019. The previous report was referring to year 2018 from 1/1/2018 till 31/12/2018.

The Report focuses on all the material topics that the company has recognized and manages. It presents the social, environmental and economic challenges that the company faces, the way in which it meets its current challenges and its goals for the future. The company is committed to communicating its non-financial performance through the Corporate Responsibility Report on an annual basis.

Report Structure

The text of the Report is based on the strategic priorities identified by the company. It covers the 5 pillars of Corporate Responsibility which are the focus of the Nea Odos strategy and actions:

- Road Safety
- Quality in Services
- Human Resources
- Caring for the Environment
- Local Communities and Social Contribution

Our 6th Report is a continuation of the effort we started in 2014 with the publication of our first Report, and aims to present and communicate the Corporate Responsibility strategy, its implementation and results. The Report has now become a dialogue platform that allows us to communicate in a systematic, transparent and structured way with our stakeholders and to set out our priorities, risks, opportunities and plans for the future. The 2019 Corporate Responsibility Report is available on the company website (<https://www.neaodos.gr>) and more specifically in the Corporate Social Responsibility section.

International Standards

This report has been prepared in accordance with the GRI Standards: Core option.

Clarifications:

Report Scope

This Report covers the operation and maintenance of the motorways and not their construction (which was officially completed in 2017) which is carried out by the EUROIONIA (TERNA - TERNA Energy) joint venture, on behalf of Nea Odos.

Accidents

The number of accidents excludes accidents involving seasonal employees who operate through an external company providing employment and payroll services. We do not record data on absenteeism.

Suppliers

Local suppliers do not relate exclusively to the maintenance and operation of the motorway. National suppliers include suppliers from related parties, most important of which is the manufacturer EUROIONIA. The remaining related suppliers focus on the maintenance and operation of the motorway (power supply, E/M facilities maintenance, etc.).

Financial Information

The financial statements for the year ended December 31st, 2019 are the third prepared by the company in accordance with the IFRS due to the acquisition of control by the parent company GEK TERNA S.A. Information on the adjustments made during the transition from GAC to IFRS is presented in the Company's Financial Statements. The company in accordance with article 2 of N. 4308/2014 is considered to be a large enterprise.

Salaries and employees' benefits include employer contributions. Payments to the capital providers have been interpreted as interest payments to banks for loans taken and repaid. Payments to suppliers (other than materials and intercompany transactions) include all payments made to suppliers other than related parties (including VAT and withholding taxes). All other payments include consumables and services provision.

Payments to suppliers also include operating support to of the Central Greece Motorway, worth €41,277,357.

The net sales of the motorway sector of Ionia Odos – A.Th.E. include the MTC and ETC toll revenues, revenues from other services and revenues from the lease of Motorist Service Stations.

External Assurance

For the 2019 report we proceeded to the External Assurance of specific parts of the content in order to improve the reliability of the information provided and the structures that allow us to collect and process information. In the last section of this report, we present the Assurance letter of the independent assurer, Grant Thornton who carried out the assessment of the specific data, in accordance with the international standard of verification ISAE 3000.

Support

The 2019 Corporate Responsibility Report was developed with the guidance and scientific support of Sustainability Knowledge Group (www.sustainabilityknowledgegroup.com).

CSR Team





A number of executives from different Departments and Divisions of the company cooperated for the collection of data, in particular:
























- **Content Coordinators:** Foteini Lamprou, Gerasimos Monokrousos, Sofia Papageorgiou
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Contact Point































You can contact us for comments, questions or suggestions.
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For the SDG Mapping Service, GRI Services reviewed that the disclosures included in the content index are appropriately mapped against the SDGs. The service was performed on the Greek version of the report.

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION	SDG LINKAGE TO DISCLOSURE
GRI 101: Foundation 2016				
GENERAL DISCLOSURES				
Organizational Profile				
GRI 102: General Disclosures 2016	102-1 Name of the organization	14		
	102-2 Activities, brands, products, and services	14, 15		
	102-3 Location of headquarters	109		
	102-4 Location of operations	15		
	102-5 Ownership and legal form	16, 17		
	102-6 Markets served	14, 15		
	102-7 Scale of the organization	14-16, 19, 20, 50, 74		
	102-8 Information on employees and other workers	74, 75		 
	102-9 Supply chain	68-72		
	102-10 Significant changes to the organization and its supply chain	16, 17, 108		
	102-11 Precautionary Principle or approach	13, 18, 22, 28, 29		
	102-12 External initiatives	25, 26, 38		
	102-13 Membership of associations	25		
	Strategy			
	102-14 Statement from senior decision-maker	7		
	102-15 Key impacts, risks, and opportunities	7, 16, 17, 22, 35, 40, 58, 74, 80, 84, 85, 98		
Ethics and Integrity				
	102-16 Values, principles, standards, and norms of behaviour	12, 13, 22		
Governance				
	102-18 Governance structure	16-18		
Stakeholder Engagement				
	102-40 List of stakeholder groups	30-32		
	102-41 Collective bargaining agreements	75		
	102-42 Identifying and selecting stakeholders	29		
	102-43 Approach to stakeholder engagement	29-33		
	102-44 Key topics and concerns raised	30-32, 34-37		
Reporting Practice				
	102-45 Entities included in the consolidated financial statements	https://www.neaodos.gr/financial-statements/?lang=en		
	102-46 Defining report content and topic Boundaries	28-37		
	102-47 List of material topics	35		
	102-48 Restatements of information	42		
	102-49 Changes in reporting	No changes		
	102-50 Reporting period	108		
	102-51 Date of most recent report	108		

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION	SDG LINKAGE TO DISCLOSURE
	102-52 Reporting cycle	108		
	102-53 Contact point for questions regarding the report	109		
	102-54 Claims of reporting in accordance with the GRI Standards	108		
	102-55 GRI content index	110		
	102-56 External assurance	115		
MATERIAL TOPICS				
ECONOMIC				
	Economic Performance			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	17, 19, 22, 26, 108, 109		
	103-3 Evaluation of the management approach	19, 20, 108, 109		
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	19, 99		 
	201-2 Financial implications and other risks and opportunities due to climate change	85		
	201-3 Defined benefit plan obligations and other retirement plans	77		
	201-4 Financial assistance received from government	No assistance		
	Indirect Economic Impacts			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37, 63		
	103-2 The management approach and its components	12, 13, 18, 22, 63, 98, 106, 108, 109		
	103-3 Evaluation of the management approach	98, 99, 108, 109		
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	63, 98-106		  
	203-2 Significant indirect economic impacts	98-100		  
ENVIRONMENTAL				
	Materials			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 86, 97, 108, 109		
	103-3 Evaluation of the management approach	22, 86		
GRI 301: Materials 2016	301-1 Materials used by weight or volume	87		 
	Energy			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 61, 86, 108, 109		
	103-3 Evaluation of the management approach	22, 72, 86, 97		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	86		   
	302-2 Energy consumption outside of the organization	86		   
	302-4 Reduction of energy consumption	86		   
	Biodiversity			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 94, 97, 108, 109		

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION	SDG LINKAGE TO DISCLOSURE
	103-3 Evaluation of the management approach	22, 97		
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	94, 95		  
	304-2 Significant impacts of activities, products, and services on biodiversity	94, 95		  
	304-3 Habitats protected or restored	94, 95		  
	Emissions			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 92, 97, 108, 109		
	103-3 Evaluation of the management approach	92, 97		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	91, 92		    
	305-2 Energy indirect (Scope 2) GHG emissions	91, 92		    
	305-4 GHG emissions intensity	91, 92		  
	305-7 Nitrogen oxides (NOX), sulphur oxides (SOX), and other significant air emissions	91, 92		   
	Effluents and Waste			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 61, 85, 88, 89, 91, 97, 108, 109		
	103-3 Evaluation of the management approach	85, 88, 89, 97		
GRI 306: Effluents and Waste 2016	306-1 Water discharge by quality and destination	88, 89		   
	306-2 Waste by type and disposal method	88, 89		  
	306-3 Significant spills	No changes		    
	306-4 Transport of hazardous waste	89		 
	306-5 Water bodies affected by water discharges and/or runoff	89		  
	Environmental Compliance			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	22, 28-37		
	103-2 The management approach and its components	18, 22, 84, 85, 97, 108, 109		
	103-3 Evaluation of the management approach	22, 97		
GRI 307: Environmental Compliance 2016	307-1 Non-compliance with environmental laws and regulations	22, 84		
	Supplier Environmental Assessment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 68-72, 85, 97, 108, 109		
	103-3 Evaluation of the management approach	72, 85		
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	22, 71		
	308-2 Negative environmental impacts in the supply chain and actions taken	69, 85		

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION	SDG LINKAGE TO DISCLOSURE
SOCIAL				
	Employment			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 74-76, 83, 108, 109		
GRI 401: Employment 2016	103-3 Evaluation of the management approach	76, 83		
	401-1 New employee hires and employee turnover	76		  
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	77		  
	401-3 Parental leave	77		 
	Occupational Health and Safety			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 80-83, 108, 109		
	103-3 Evaluation of the management approach	22, 80-83		
GRI 403: Occupational Health and Safety 2018	403-1 Workers representation in formal joint management-worker health and safety committees	22, 80, 81		
	403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities	80-82		
	403-3 Workers with high incidence or high risk of diseases related to their occupation	81, 83		
	403-4 Worker participation, consultation, and communication on occupational health and safety	81, 82		
	403-5 Worker training on occupational health and safety	82		
	403-6 Promotion of worker health	83		
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 2.	82		
	403-8 Workers covered by an occupational health and safety management system	81		
	403-9 Work-related injuries	81		  
	403-10 Work-related ill health	81		 
	Training and Education			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 78-80, 83, 108, 109		
	103-3 Evaluation of the management approach	78, 79, 83		
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	79		   
	404-3 Percentage of employees receiving regular performance and career development reviews	78		  
	Diversity and Equal Opportunity			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	18, 22, 78-80, 83, 108, 109		
	103-3 Evaluation of the management approach	78, 79, 83		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	79		 

GRI STANDARD	DISCLOSURE	PAGE NUMBER(S) AND/OR URL(S)	OMISSION	SDG LINKAGE TO DISCLOSURE
	405-2 Ratio of basic salary and remuneration of women to men	78		 
	Non-discrimination			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	12, 13, 18, 22, 74, 77, 83		
	103-3 Evaluation of the management approach	77, 83		
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	77		 
	Local Communities			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	12, 13, 18, 22, 63, 71		
	103-3 Evaluation of the management approach	63, 71, 72, 98-106		
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	63, 94, 98-106		
	413-2 Operations with significant actual and potential negative impacts on local communities	63, 94, 71, 98-106		 
	Customer Health and Safety			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37		
	103-2 The management approach and its components	12, 13, 18, 22, 41, 42, 55, 56, 108, 109		
	103-3 Evaluation of the management approach	43-45, 51-53, 56		
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	40-56		
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	11, 22		
	Marketing and Labelling			
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its Boundary	28-37, 65-67		
	103-2 The management approach and its components	12, 13, 18, 22, 29, 64, 105, 108, 109		
	103-3 Evaluation of the management approach	41, 42, 47, 50, 53, 56, 105		
GRI 417: Marketing and Labelling 2016	417-1 Requirements for product and service information and labelling	42, 55, 56, 105		
	417-2 Incidents of non-compliance concerning product and service information and labelling	11, 22, 105		
	417-3 Incidents of non-compliance concerning marketing communications	11, 22		

Independent Limited Assurance Report

To the Board of Directors of NEA ODOS CONCESSION SOCIETE ANONYME

The Board of Directors of "NEA ODOS CONCESSION SOCIETE ANONYME" (Nea Odos S.A.) (the "Company") engaged "GRANT THORNTON S.A. CHARTERED ACCOUNTANTS MANAGEMENT CONSULTANTS" ("Grant Thornton") to review selected data included in the 2019 Corporate Responsibility Report of Nea Odos S.A. for the fiscal year ended on December 31st, 2019 ("selected data"), in accordance with the Global Reporting Initiative (GRI) Standards ("GRI-Standards").

Scope

We performed our engagement in accordance with the provisions of "International Standard on Assurance Engagements 3000 (Revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information" ("ISAE 3000"), in order to provide limited level assurance opinion on selected data of the 2019 Corporate Responsibility Report, with regard to:

- The completeness and accuracy of quantitative data and the plausibility of qualitative information related to the GRI General Disclosures that are required as a minimum prerequisite for the "In accordance – Core" option, according to the GRI 102 Standard.
- The completeness and accuracy of quantitative data and the plausibility of qualitative information against the requirements of the respective GRI Standards for the Topic Specific Disclosures 201-1, 302-1, 305-1, 305-2, 401-1, 404-1, 404-3, 413-2, 416-1, meeting the GRI Standards "In accordance - Core" option requirements, in relevance with the following seven (7) material issues: "Economic Performance", "Energy", "Emissions", "Employment", "Training and Education", "Local Communities" and "Customer Health and Safety".

Management Responsibility

The Management of Nea Odos S.A. is responsible for the preparation and presentation of the selected data provided to us, as incorporated in the 2019 Corporate Responsibility Report of the Company, as well as for the completeness and accuracy of the selected data. Furthermore, the Management is responsible for maintaining records and adequate internal controls that are designed to support the reporting process.

Grant Thornton Responsibility

Our responsibility is to carry out a limited assurance engagement and to express our conclusions based on the procedures carried out for the selected data, as described in the "Scope" section.

The procedures we carried out were designed to provide limited assurance, as specified by ISAE 3000, based on which we shaped the conclusion to our engagement.

These procedures are not as extensive as those required for providing reasonable assurance; consequently, a lower level of assurance is obtained.

Our responsibility is limited to the information related to the fiscal year that ended on December 31, 2019, as these were included in the 2019 Corporate Responsibility Report of the Company.

To the extent it is permitted by the legislation in force, we neither accept nor assume any responsibility for our engagement or this report towards anyone other than the Company, unless the terms have been agreed explicitly in writing, with our prior consent.

Limitations

- To conduct our work, we relied exclusively on the information provided to us by the Company's executives, which we accepted in good faith as being complete, accurate, real and not misleading. Therefore, we did not submit it to any verification procedures, apart from the procedures explicitly stated in our Report and which arise from our mutually agreed methodology.
- Our engagement was limited to the Greek version of the 2019 Corporate Responsibility Report. Therefore, in the event of any inconsistency in translation between the Greek and English versions, as far as our conclusions are concerned, the Greek version of the Report prevails.
- No work has been conducted on data for previous reporting periods, as well as on data related to forecasts and targets.
- No work has been conducted on anything other than the agreed scope and consequently, our opinion is limited to that scope.

Work conducted

We conducted our work so as to collect all the data, relevant documentation, information and explanations we considered necessary as to the selected data described in the "Scope" section. The procedures followed with regard to the selected data included:

- Performed interviews with personnel of the Company responsible for managing, collecting and processing data in order to obtain an understanding of key structures, systems, policies and relevant procedures applied.
- Applied audit procedures, on a sample basis, in order to collect and review audit evidence.
- Reviewing the GRI Content Index found on pages 110-117 of the 2019 Corporate Responsibility Report, as well as the relevant references included therein, against our scope of work.

Independence

Grant Thornton implements the requirements of International Standard on Quality Control 1. Based on this, it maintains an integrated quality control system that includes policies and procedures for compliance with ethical principles, professional standards and relevant legal and regulatory requirements. We comply with the independence requirements and other ethical standards of the IFAC Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, impartiality, professional adequacy, confidentiality and professional conduct. In this context, the assurance team is independent from the Company and has not participated in the preparation of the Company's 2019 Corporate Responsibility Report.

Conclusion

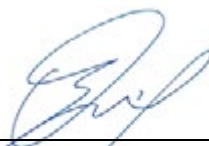
We report the following conclusions based on the scope and the limitations of our engagement. Our conclusions are based on the procedures we carried out, as described in the "Work Conducted" section:

- Nothing has come to our attention that causes us to believe that the 2019 Corporate Responsibility Report does not meet the GRI Standards' requirements of the "In accordance core" option.

- Nothing has come to our attention that causes us to believe that the indicators (topic standard disclosures) included in the 2019 Corporate Responsibility Report, as described in section “Scope”, are materially misstated.
- Nothing has come to our attention that causes us to believe that the 2019 Corporate Responsibility Report is not in accordance with the International Standard on Assurance Engagements 3000, Assurance Engagements other than Audits or Reviews of Historical Financial Information (“ISAE 3000” (revised)), as well as that the GRI General and Specific Disclosures (201-1, 302-1, 305-1, 305-2, 401-1, 404-1, 404-3, 413-2, 416-1), do not meet the GRI Standards’ requirements.

Athens, 7/12/2020

The Chartered Accountant



Thanasis Xynas

CPA (GR) Reg. No.34081



