



Message from the CEO

Dear stakeholders.

The publication of the 5th annual Nea Odos Corporate Responsibility Report constitutes a substantial, fully documented proof that the goal we set several years ago as regards integrating the principles, values and commitments of Corporate Responsibility into every aspect of our daily operations has now become a reality.

The 2018 Report is extremely important to us, as 2018 signals the operational completion of our project, and during this year:

A) Both the construction and the full operation of the Ionia Odos motorway have been completed, a project linking 2 Regions, 4 prefectures and 10 Municipalities, giving a boost to development not only in Western Greece and Epirus, but in the whole country,



B) Significant infrastructure upgrade projects have also been designed, implemented and completed at the A.TH.E Motorway section from Metamorphosis in Attica to Scarfia, a section we operate, maintain and manage.

During the first year of the full operation of the motorways - with 500 employees in management and operation, with more than 350 kilometres of modern, safe motorways in 7 prefectures of our country with a multitude of local communities - we incorporated in our daily operations actions, activities and programs we had designed, aiming at supporting and implementing the key strategic and development pillars of our company for the upcoming years.

These pillars are the following:

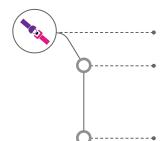
- Constant improvement of the road safety conditions and provision of high-quality services with the ultimate objective being that every driver considers us to be his/her best possible travel companion
- Lifelong training and development of the talents of our people
- Substantial contribution towards for the protection of the environment
- Cooperation with and support towards the local communities

On the basis of these pillars, our future pursuits are defined, and our operational planning is designated with the following key characteristics:

- Leveraging technologies through innovative initiatives. In a context where climate change is becoming a reality and public works and transport can play a leading role, Nea Odos commits to leveraging technologies to reduce the environmental impact stemming from its operation on the one hand, and to commence the use, developement and offering of innovative services with a low energy footprint on the other.
- The improvement and modernization of all our operating processes. Sustainable development is defined by our principles and values and is reflected in our policies and business culture. As early as 2016, the company began the process of identifying and mapping the 17 UN Sustainable Development Goals (SDGs) that are directly and indirectly related to its business activities and are an integral part of its business strategy. In our 2018 Report, we incorporate SDG goals into our operations and link them to our corporate goals as an important reference framework for our business. Adopting new business practices for the joint management of the social, environmental and management issues of the Ionia Odos motorway and the A.TH.E motorway, we optimize our performance and the management of the available resources.
- Empowering our employees. In a context of economic recovery and strong labor market tensions, ensuring the highest possible
 satisfaction of our employees and our associates makes us constantly alert as regards taking initiatives to enhance our corporate
 identity and culture. We assume our responsibility towards our people and recognize that we have to be a good and fair employer.
 Maintaining a good work environment in times of great internal change is difficult, but being loyal to our principles, we constantly
 work on instilling common values, on enhancing our people's opportunities and talents, and on creating opportunities for growth.
- In conclusion, I must note that our 2018 results have led us to believe that we can be more methodical and raise the bar higher each year, creating value for the country through the adoption of sustainable development standards, through responsible operations, long-term partnerships and strategic initiatives. Convinced that we are on the right track, I hope that this Report will enrich the dialogue we have begun years ago with you, our stakeholders, companions and fellow travellers.

Stelios Pentheroudakis, CFO





Road Safety

Primary Sustainable Development Goals



3. GOOD HEALTH AND



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES AND COMMUNITIES

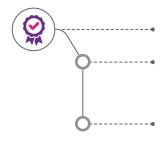
Secondary Sustainable Development Goals



- 44,295 manhours invested in road infrastructure repairs
- Innovative program for tunnel upgrading
- More than 7,000 vehicles safely towed

Manhours for Road Maintenance

2018	2017	2016
221,269	106,215	63,019



Quality in Services

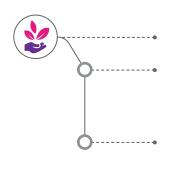
Primary Sustainable Development Goals



Secondary Sustainable Development Goals



- Managed over **76,500** customer calls
- 7,299,833 electronic transactions performed in Nea Odos' Toll Stations
- Invested more than €657,900 for the discount programs for permanent residents



Caring for the Environment

Primary Sustainable Development Goals





Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



. CLEAN WATER AND



7. AFFORDABLE AND CLEAN ENERGY



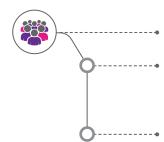
11. SUSTAINABLE CITIES AND COMMUNITIES



15. LIFE ON LAND



- 17. PARTNERSHIPS FOR THE GOALS
- Invested over €970,000 in Environmental protection projects
- Extensive restructuring of the recycling system on the motorways
- Green Motorist Service Stations



Human Resources

Primary Sustainable Development Goals



Secondary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



4. QUALITY EDUCATION





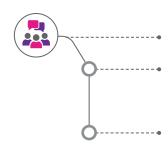




- **530** employees
- 44% women
- 3,985 total training hours
- 42 employees participated in the Development Centres

Evolution of employee numbers

2018	2017	2016	2015
297	290	172	129



Cooperation with Local Communities and Social Contribution

Primary Sustainable Development Goals



Secondary Sustainable Development Goals









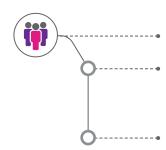


11. SUSTAINABLE CITIES AND COMMUNITIES



16. PEACE, JUSTICE AND STRONG INSTITUTIONS

- €112,982,400 in total investments to local and national suppliers
- Utilized more than €568,600 in social initiatives



Organisation and Management

Primary Sustainable Development Goals





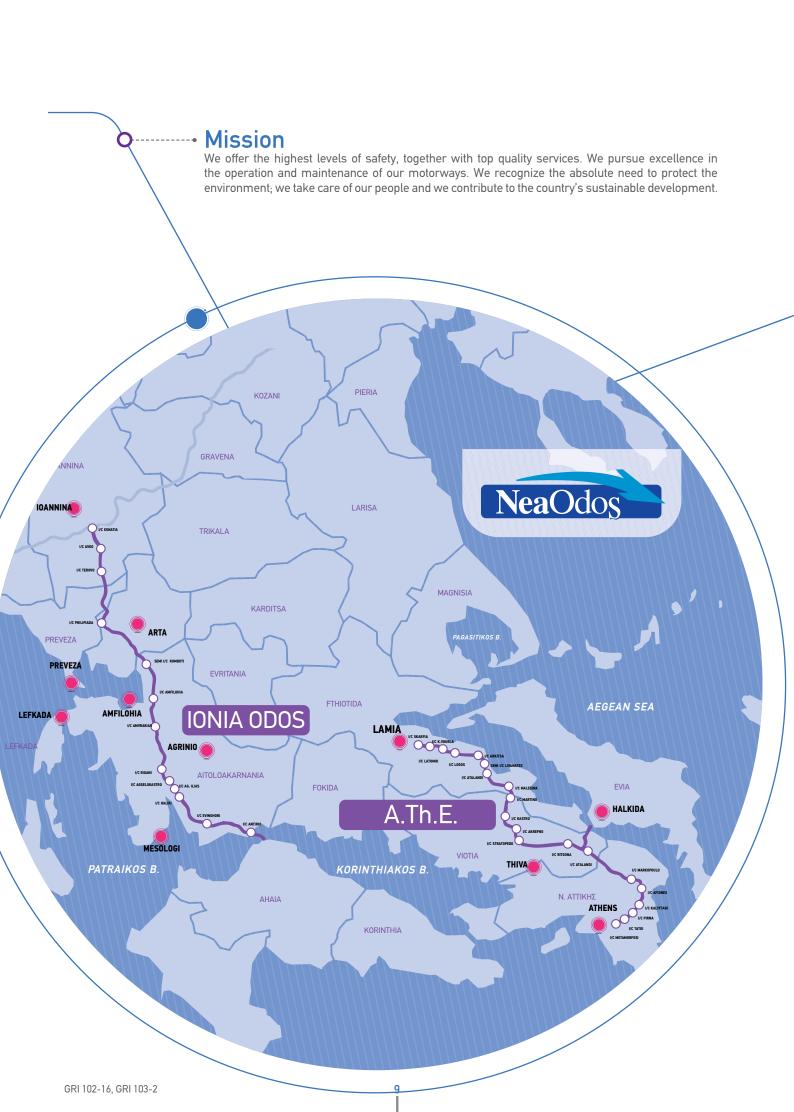
17. PARTNERSHIPS FOR THE GOALS

ZERO incidents of non-compliance

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

For the **4th consecutive year**, we have been recognised at the Hellenic Responsible Business Awards

Established presence in scientific and professional conferences



Vision

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.



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 (Skarfeia) and the connecting branch of the A.Th.E. Schimatari – Chalkida" concession project.

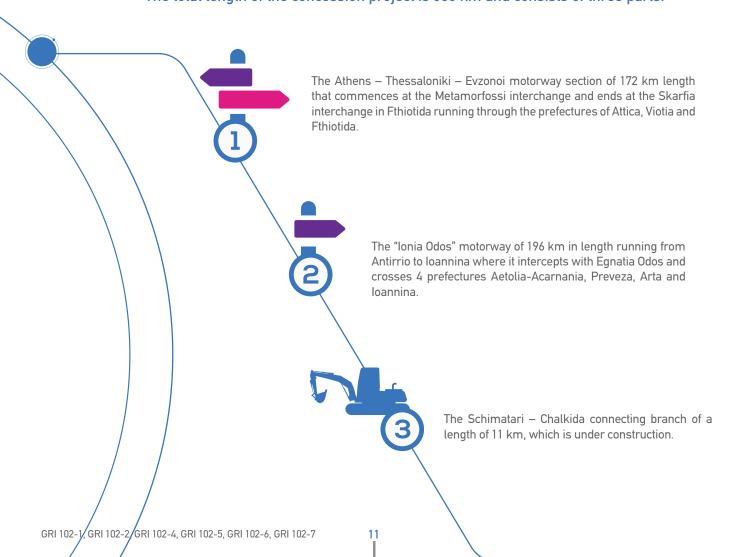
Nea Odos is responsible directly or through its partners for:

- The study and the preparation of all the necessary studies (environmental, road-construction, geotechnical etc.)
- The design of all new parts
- The construction of all new parts
- The operation, control and traffic monitoring, emergency event management, routine tasks (i.e. road cleaning)
- The maintenance of the premises, the motorway, the relevant equipment, the vehicles
- The management and collection of tolls
- The management of Motorway Service Stations

The motorways that Nea Odos manages, constitute substantial road infrastructure for Greece as a country, follow European standards and contribute to its economic and social development, being integrated in the best possible manner in the environment hosting them.

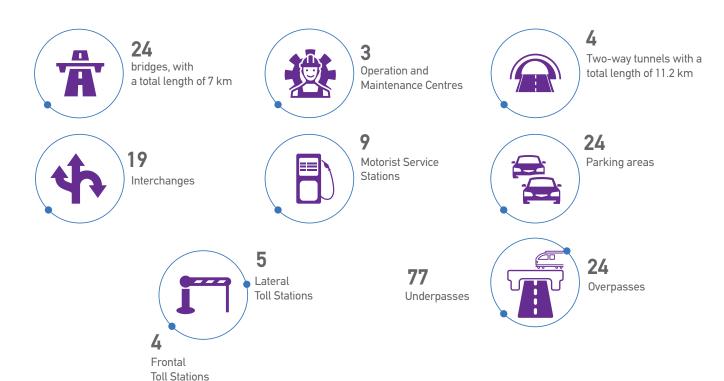
The primary concern of Nea Odos is to provide a secure road driving environment with the provision of contemporary road safety services and customer care, significantly reducing commute and travel time.

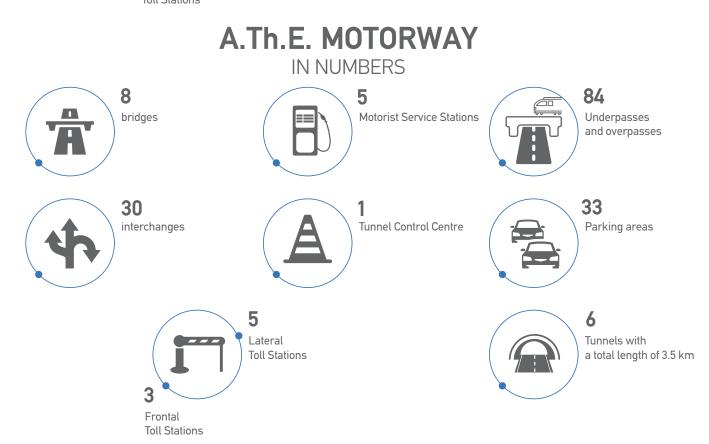
The total length of the concession project is 380 km and consists of three parts:



IONIA ODOS MOTORWAY

IN NUMBERS





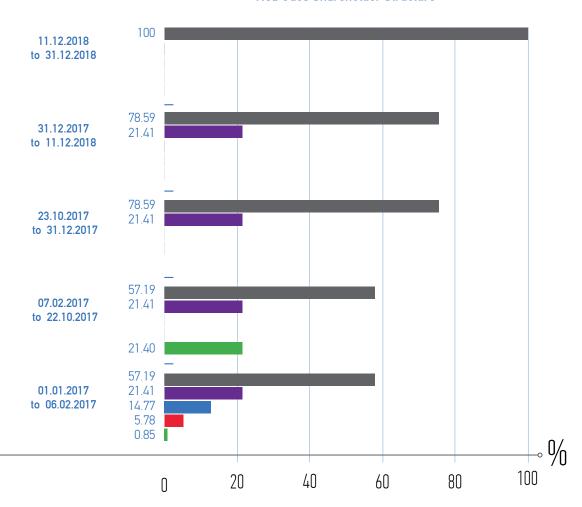
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1.3 Shareholder and Organizational Structure

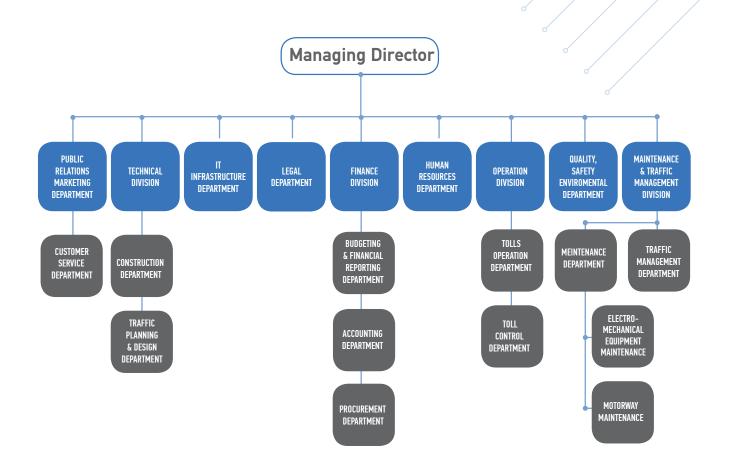
The organizational structure of the company aims at safeguarding the legitimate interests of its shareholders and maximizing its substantial contribution to society and the economy. Its effective operation, the optimization of its organizational structure and its responsible business activities are supported by a coherent framework characterized by

transparency, integrity, credibility and ethics. Moreover, the continuous strengthening of its organizational structure allows the company to remain flexible and promptly respond to modern social challenges and the expectations of its internal and external stakeholders.

Nea Odos Shareholder Structure



- GEK TERNA S.A.
- FERROVIAL S.A.
- ACS SERVICIOS S.A.
- DRAGADOS S.A.
- IRIDIUM S.A.





The Board of Directors of Nea Odos for 2018, is now composed of the following members:

- 1. Emmanouil Vrailas CEO (non-executive member)
 - 2. Emmanouil Moustakas Vice Chairman (non-executive member)
 - 3. Stylianos Pentheroudakis Member (executive member)
 - 4. Sofia Dimitrakopoulou Member (non-executive member)
 - 5. Alexandros Iosif Aligizakis Member (non-executive member)
 - 6. Vasileios Delikaterinis Member (non-executive member)
 - 7. Christos Zaribas Member (non-executive member)
 - 8. Andromachi Pasallidou Member (non-executive member)
 - 9. Alexandros Karyotakis Member (non-executive Member)
 - 10. Pinelopi Lazaridou Member (non-executive Member)

Gender Ratio and Age Distribution of the Board of Directors

| Women M | en | | | |
|---------|---------|-----|-------|-----|
| | Members | <30 | 30-50 | 50+ |
| 4 | 3 | 0 | 1 | 2 |
| | 7 | 0 | 3 | 4 |
| Total | 10 | 0 | 4 | 6 |

The Board of Directors decisively contributes to the smooth operation of the company. As its management body, it ensures that the Management follows, serves and implements the corporate strategy and ensures a fair and equitable working environment for all employees, regardless of position, duties and responsibilities. The Board of Directors manages corporate affairs for the benefit of the company and all interested parties, based on the principles and values of the company, in a moral, impartial and socially acceptable manner.

The company's operations are in line with the Greek and European legislation and the company has never limited itself to its institutional and legal obligations but works to exceed social expectations. This Report contains the best practices that enable the company to carry out its mission and be a model for its industry. For instance, during 2018, there was no corruption incident nor termination of a collaboration agreement due to corruption-related infringements.

1.5 Economic Performance

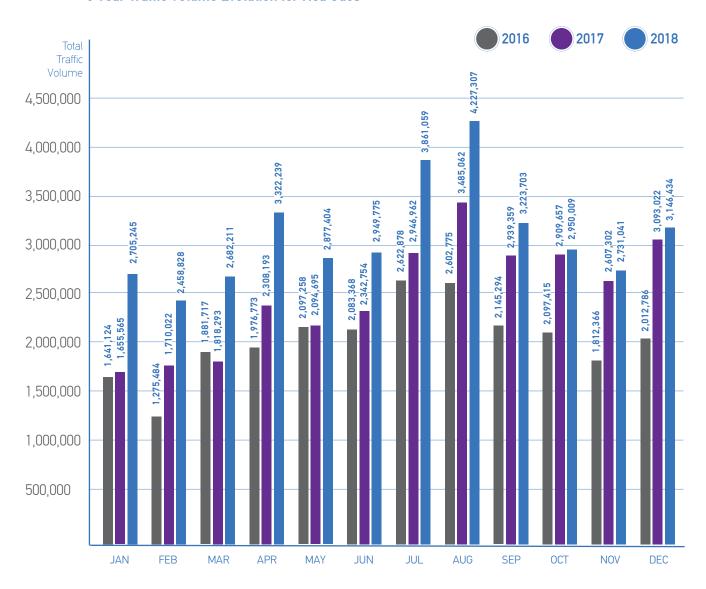
The financial statements for the fiscal year that ended on December 31st, 2018 have been prepared in accordance with the International Financial Reporting Standards (IFRS). All the published financial data of the company is presented in the 2018 Annual Financial Statement.

| Net sales
(in th. €) (31/12) | 2018 IFRS | 2017 IFRS | 2016 IFRS |
|---|------------|-------------------|------------|
| (Exploitation segment of Ionia Odos — A.Th.E. Motorway. | 127,322.32 | 96,609.22 | 76,823.62 |
| Construction segment of Ionia Odos Motorway | 3,871.15 | 139,547.60 | 278,175.96 |
| Total | 131,193.46 | 236,156.82 | 354,999.58 |
| Financial Information (in th. €) | 2018 IFRS | 201 7 IFRS | 2016 IFRS |
| Net Sales | 131,193.46 | 236,156.82 | 354,999.58 |
| Other operating income | 12,199.95 | 15,669.85 | 20,919.63 |
| Revenue from financial investments | 1,134.07 | 2,419.05 | 1,298.14 |
| Total income | 144,527.48 | 254,245.72 | 377,217.35 |
| Operating cost | 62,601.17 | 189,859.08 | 317,425.23 |
| Employee salaries and benefits | 12,119.37 | 8,906.90 | 6,619.37 |
| Payments to providers of capital | 33,275.28 | 8,488.48 | 6,798.66 |
| Net profit / (loss) before taxes | 20,500.65 | 1,453.13 | -2,826.77 |
| Net profit / (loss) after taxes | 15,139.89 | 6,766,47 | 4,276.36 |
| Total payments to state bodies (taxes paid) | 12,912.93 | 10,008.56 | 9,977.93 |
| Company investments | 16,120.19 | 144,975.83 | 272,557.19 |
| Total capitalisation | 472,068.91 | 532,786.47 | 583,290.09 |
| Equity | 257,784.45 | 242,162.41 | 232,936.42 |
| Total liabilities | 301,250.23 | 400,785.70 | 426,794.45 |
| Total assets (in million €) | 559,034.68 | 642,948.11 | 659,730.87 |

Increase of total passages by 24.15% compared to 2017

| | | 2018 | | 2017 | 2016 |
|---|-------------------|------------|------------|-------------------|-------------------|
| Total vehicle entries and
Electronic Toll Collection
system (ETC) | Total
NEA ODOS | A.Th.E. | IONIA ODOS | Total
NEA ODOS | Total
NEA ODOS |
| Total vehicle entries | 37,135,255 | 27,195,624 | 9,939,631 | 29,910,886 | 24,249,238 |
| Number of non-exempted electronic transactions performed in Nea Odos' Toll Stations (ETC) | 7,299,833 | 6,104,591 | 1,195,242 | 5,189,455 | 4,012,491 |
| Percentage | 19.7% | 22.4% | 12.0% | 17.3% | 16.5% |

3 Year Traffic Volume Evolution for Nea Odos



17

2018

| Crossings by Vehicle Category | | Total of NEA ODOS | A.Th.E | IONIA ODOS |
|-------------------------------|----|-------------------|------------|------------|
| Category 1 | 55 | 278,819 | 204,481 | 74,338 |
| Category 2 | | 30,265,028 | 21,927,731 | 8,337,297 |
| Category 3 | | 3,055,748 | 2,344,392 | 711,356 |
| Category 4 | | 3,535,660 | 2,719,020 | 816,640 |

1.6 Business Ethics and Responsible Operation

Nea Odos strictly complies with the provisions of the existing legislation regarding environmental, social, employment and operational issues. It follows all regulations concerning the totality of its operation and is in line with the Greek and European legislation. It is systematically kept informed of the content of its legal and institutional obligations in order to respond effectively and timely to the commitments arising from the legal framework of its operation, the moral standards and social expectations.

Nea Odos follows best practices with respect to its vision, mission and founding values, exceeding its formal obligations. Our values, which focus on efficiency and effectiveness, on responsibility, on the strength of our people and integrity, allow us to offer the highest levels of road safety combined with the highest ever quality of services.

For the reference period, there were no reported problems 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. In addition, no incident of non-compliance with the laws or regulations regarding the safety of drivers has been recorded. There was no corruption incident or no termination of a cooperation agreement due to corruption-related offenses. At the same time, there has been no case of non-compliance in the departments of communications, marketing, advertising and sponsorships.



1.7 International Standards and Certifications

The operation of the company is governed by an integrated system of procedures, based on and regulated by international standards certified by external bodies.

For the company, the certification of its systems and operations, is considered a strategic decision and priority.

It has now become clear to both internal and external stakeholders that all of the company's core activities are interlinked and at the same time contribute to ensuring high quality services for drivers, providing a safe work environment and protecting the environment. Consequently, the implementation of international certification standards for all its main pillars of its operation is an integral part of its corporate identity.







Hellenic Responsible Business Awards 2018: "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.

Hellenic Responsible Business Awards 2018 "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, Aitolia, 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.



2.1 Participation in Bodies, Partnerships and Initiatives

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

The Observatory of Road Networks in Western Greece and Peloponnese (POADEP) was established in 2009 and its objective is to assess and systematically monitor the spatial effects of construction and operation of road projects in Western Greece and more widely across the country. Therefore, our cooperation with the Observatory allows us to constantly monitor the impact of our motorways on the economic and social development of adjacent communities and gives us access to relevant studies, surveys and reports.

Hellastron

Nea Odos is a member of the organization "HELLENIC ASSOCIATION of TOLL ROAD NETWORK" with the distinctive title "HELLASTRON" that was founded in late 2014 comprising all modern motorways and toll operating infrastructures operating in Greece. Hellastron participates in the following European and Global bodies, representing our country:

"ASECAP" / Association Européenne des Concessionaires d' Autoroutes et d' ouvrages à Péage (European Association of Operators of Toll Road Infrastructures) based in Brussels http://www.asecap.com/

"IBTTA" / International Bridge, Tunnel and Turnpike Association based in Washington, USA. http://www.ibtta.org/

Hellenic Institute for Customer Service

Nea Odos is a member at the Hellenic Institute for Customer Service and actively contributes to continuous improvements of the services that customers, citizens and people receive.

"Panos Mylonas" Road Safety Institute

The public awareness and education initiatives that Nea Odos undertakes are in collaboration with "Panos Mylonas" Road Safety Institute. As a member of the Road Safety Institute, we take part in planning and implementing actions that are targeted at the prevention and reduction of road accidents.

Diazoma

Nea Odos actively participates as a corporate member in the Diazoma Association which was founded to help protect, restore and promote monuments, especially ancient theatres and the Greek cultural heritage.

Interamerican

The strategic partnership in the field of road assistance with INTERAMERICAN concerns towing and removing vehicles of all types, light, heavy, two wheelers, etc. that have been immobilized on the Ionia Odos motorway and on the A.TH.E. section, due to a car damage or a road accident. This specific roadside assistance service covers all drivers and is offered free of charge.

Presentations at Conferences

Our most notable conference presentations during the reference year have been the following:

- The CSR in Action 2018 conference: a presentation on the "Streets of Culture Development Roads: Guided by culture and with Diazoma and Clio Muse as Fellow Travellers" by Mr. Gerasimos Monokrousos
- Workshop on Intelligent Transport Systems and developments in Greece: a presentation on "Sophisticated systems and applications for the management of the NEA ODOS and KENTRIKI ODOS Greek motorways" by Mr. Ioannis Sioutis
- The Greek Committee of Tunnels & Underground Projects for Licensing and the Methods of Monitoring/Auditing Experiences from the Operation of the Greek Motorway Tunnels: a presentation on "Development and commissioning of new SCADA in tunnels in use" by Mr. Ioannis Sioutis
- International Seminar on Roads, Bridges, & Tunnels 9-15 November 2018, a presentation on "A Comprehensive Maintenance Plan for Infrastructure" by the Managing Director Mr. Stylianos Pentheroudakis

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 | \checkmark | | | \checkmark |
| "Panos Mylonas" Road Safety Institute | √ | √ | ✓ | \checkmark |
| Diazoma | \checkmark | \checkmark | \checkmark | \checkmark |

| Connection to | • | 2018 | 2019 | |
|--|--|--|-----------------------------------|--|
| the Sustainable Development Goals | Topic | Goal | Progress | Goal |
| 17. PARTNERSHIPS
FOR THE GOALS | Participation in Global
Initiatives | Adopt the Sustainable
Development Goals | Incorporate in corporate strategy | Incorporate in corporate initiatives |
| 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Reinforcement of internal structures | Development of
Code of Conduct | Moved to 2019 | Adopt the Code of
Conduct of GEK
TERNA GROUP |
| 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Annual Recertification | Annual Recertification:
ISO 9001:2015 | Completed | Annual
Recertification |



3

CORPORATE RESPONSIBILITY

3.1 Our Approach

Recognizing that the motorways that Nea Odos is responsible for are a public good that we are called upon to manage, calls for excellent strategic planning with long-term policies and practices for the economic development of the local and regional societies and for protecting and regenerating the environment. In this context, Corporate Responsibility is an important element of the Nea Odos governance.

In particular, the company approaches Corporate Responsibility in a way that reflects its philosophy, mission and corporate values.

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

- Road Safety: Continuous mitigation of traffic accidents
- Quality of Rendered Services: To be the best possible travel companion
- 3 Human Resources: To provide the best possible work environment
- **Environment:** Contribution to the protection of the environment
- Cooperation with the Local Communities Social Contribution: Support and development of the neighbouring local communities

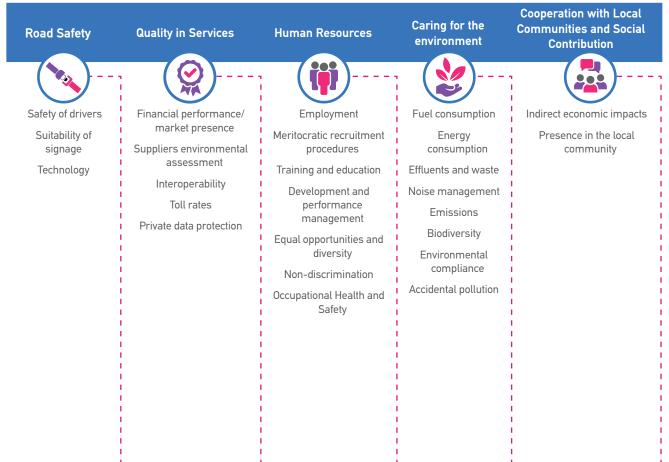
Corporate Responsibility Pillars

Our Values

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

Corporate Governance

Zero corruption and transparency, Ethical governance



3.2 Handling Corporate Responsibility Issues

The management of the issues pertaining to our Corporate Responsibility requires a systematic approach, and support from the Management Team and presupposes the active participation of all departments of the company.

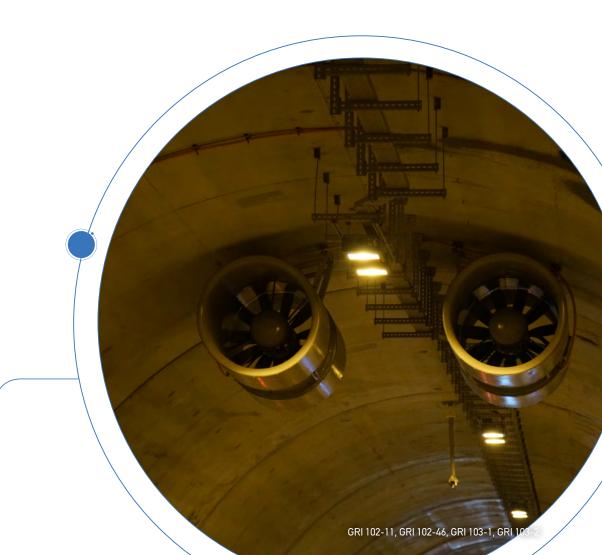
For this reason, the Corporate Responsibility Team has been set up, which consists of specialized executives from all the company's main departments and is responsible for managing Corporate Responsibility issues that the company has identified.

The responsibilities of the Team include:

- 1 the collection of data required for the annual Corporate Responsibility Report
- 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:

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



The significance of mapping all stakeholders

In 2018, with the formal completion and delivery of the Ionia Odos and A.Th.E. motorways, Nea Odos considered it appropriate and necessary to repeat the mapping process in order to better understand and map the issues of materiality that affect and influence the stakeholders.

The methodology was designed to highlight changes and new data in the way we categorize and interact with stakeholders, particularly in terms of how to respond to issues of mutual interest, and in terms of the methodology of managing issues of local or national importance. An expanded team of executives from all departments and sections of the company took part in the creation of the methodology.

This initiative has improved the quality of the company's relationships with its stakeholders, enabling Nea Odos to get a more comprehensive picture of the issues that interest stakeholders, to timely detect topics that need to be addressed, and in particular to launch social actions, environmental programs and innovative business initiatives that focus on recognized material topics.

The keyways of interaction with stakeholders and the main issues of interest are listed in the following table.

| Direct stakeholders | Expectations/Main issues | Communication Mechanisms | Communication frequency | Communication Outcomes |
|---------------------|---|---|-------------------------------------|---|
| Employees | Regular communication between employees and management Informing employees about organizational changes and anything related to the company Emphasis on Health and Safety issues Rewards, additional benefits and remuneration system Respect, equality and meritocracy Training, evaluation and development opportunities Respect for personal and family life Retain a positive company profile | Meetings between employees and management representatives Email correspondence Newsletters HR Department Open door policy Personal communication Commitment and satisfaction survey Corporate Responsibility Report | Continuous
communication | Improvement of employees' development process through the establishment of Development Centres Initiatives for the improvement of the working environment, boost confidence amongst employees and enhance a sense of active participation Strengthen employee commitment Better dissemination of information, understanding the purpose of change Recognise the company as a fair employer |
| | | | | Increase efficiency Reduction of leaves |
| Motorway Drivers | Safe and fast travel Infrastructure quality, quality of service, satisfaction and reliability Immediate response to incidents Immediate response to requests or complaints Immediate dissemination of information Private data protection Interoperability Upgrade commercial policy and rewards for frequent users New and innovative payment methods Toll rates, discount policy | Customer service department Customer satisfaction surveys Complaint handling department Awareness campaigns Company website Emergency number Variable Message Signs (VMS) Press Releases Employees at toll stations Media Corporate Responsibility Report Email / contact forms RSS | Daily | Road network interventions and infrastructure improvement initiatives Improvement of signage Good publicity and reputation Extending social consensus with the company's objectives Stabilization of safety feeling in the motorway Discount programs Better understanding of future issues that may arise including possible increase of fares Understanding the role of the company and satisfaction with the provided services Ideas and suggestions |
| Local Communities | Stimulate the local economy, create jobs and develop the wider region Indirect positive financial effects Improve standard of living Recruitment from local communities Sponsorships - charity actions and social investments Respect and protection of local environmental wealth Retain high level of service | Meetings with representatives of local communities Consultation with local associations and bodies of residents Local media | On regular time
intervals/ Daily | More targeted support for the local economy Smooth cohabitation Increase local business revenue Attractive working environment and enhanced Nea Odos' image as an employer |

| Direct stakeholders | Expectations/Main issues | Communication
Mechanisms | Communication frequency | Communication Outcome |
|--|---|--|-------------------------------------|---|
| Local Government | Comprehensive information regarding impacts from the company's operation on a local level Accountability and taking measures where necessary Strengthen local agents' and local government's initiatives | Direct communication with administrative structures at local level | Regular | Collaboration for voluntary actions |
| Shareholders | Financial performance, efficiency, dividend distribution Regular and correct information/reporting Effective governance mechanisms Leadership in the industry and positive reputation Provide high quality services and develop innovations Develop partnerships | Board of Directors meetings
and General Assemblies
Regular reporting
Company website
Balance Sheets and Financial
Statements
Corporate Responsibility
Report
Correspondence and business
meetings | Regular | Detailed recording of the environmental and social impacts of the company and the disclosure through the Corpora Responsibility Report Adopt new practices, better resource management and improved crisis response |
| NGOs | Support NGOs goals
Economic support
Public awareness | Company website Department of Public Relations Corporate Responsibility Report | Regular | 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 | Regular | Full compliance with the law Analysis of social and environmental risks Project financing / disburseme Payment of suppliers Positive publicity Timely resolution of issues |

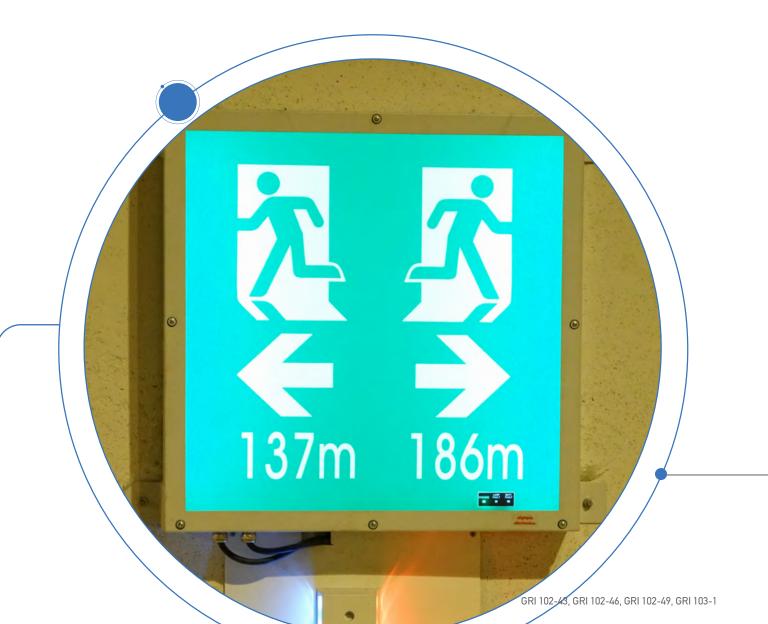
| Direct stakeholders | Expectations/Main issues | Communication Mechanisms | frequency | Outcomes |
|---|---|--|-------------------------------------|--|
| Partners, Suppliers
and Subcontractors | Transparency in procurements and in governance mechanisms Meritocracy in selecting suppliers and partners 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 |

| Indirect
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 | Regular | 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 | Regular | 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 |

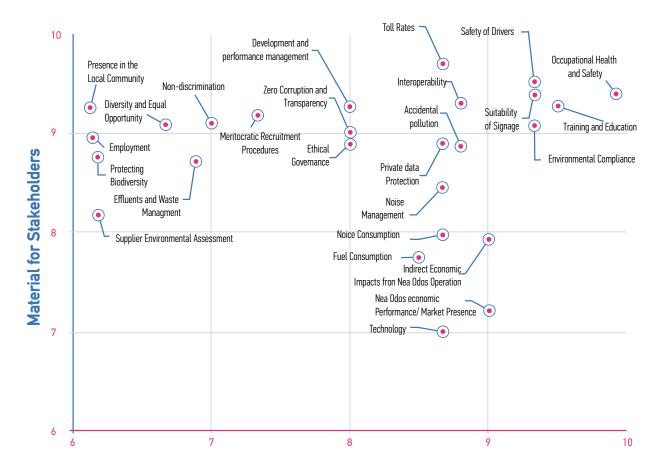
The relevant process was implemented by representatives of all departments and functions who followed three main steps:

identification of material topics and issues based on their impact on the company's business operations, defining their boundaries,

- an assessment based on the importance of their impact both on the company and their impact on the evaluations and decisions of the stakeholders, and
- validation as to their completeness so that the content of the Report reflects the company's significant economic, environmental and social impacts and allow stakeholders to assess its performance during the reporting period.
- the result of this process was to validate as the most important the 27 topics presented in the table of material topics, while identifying the core content of the 2018 Corporate Responsibility Report.



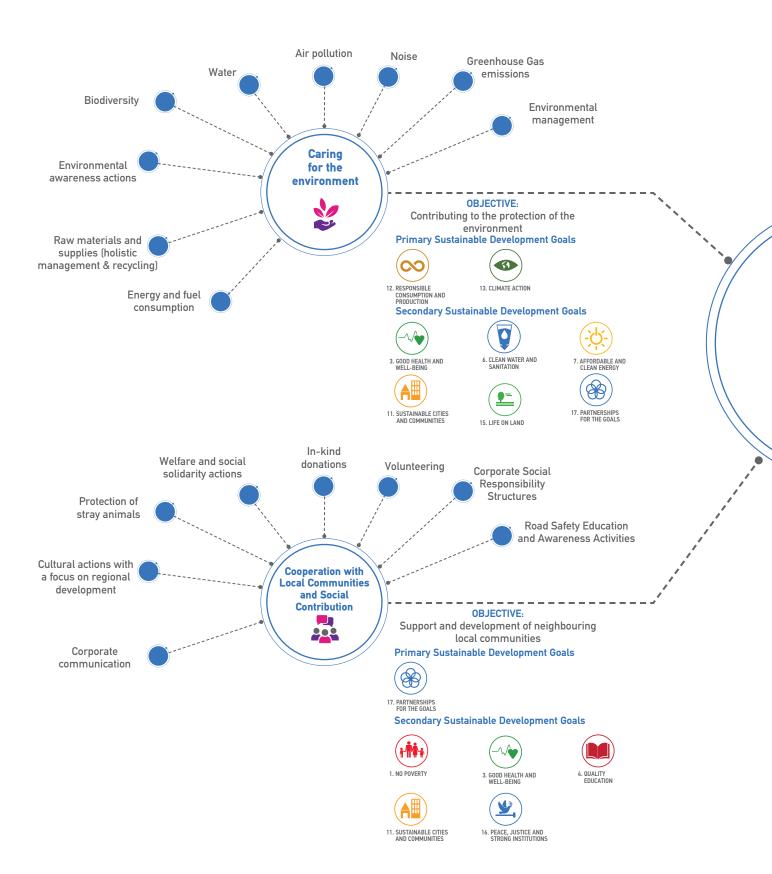
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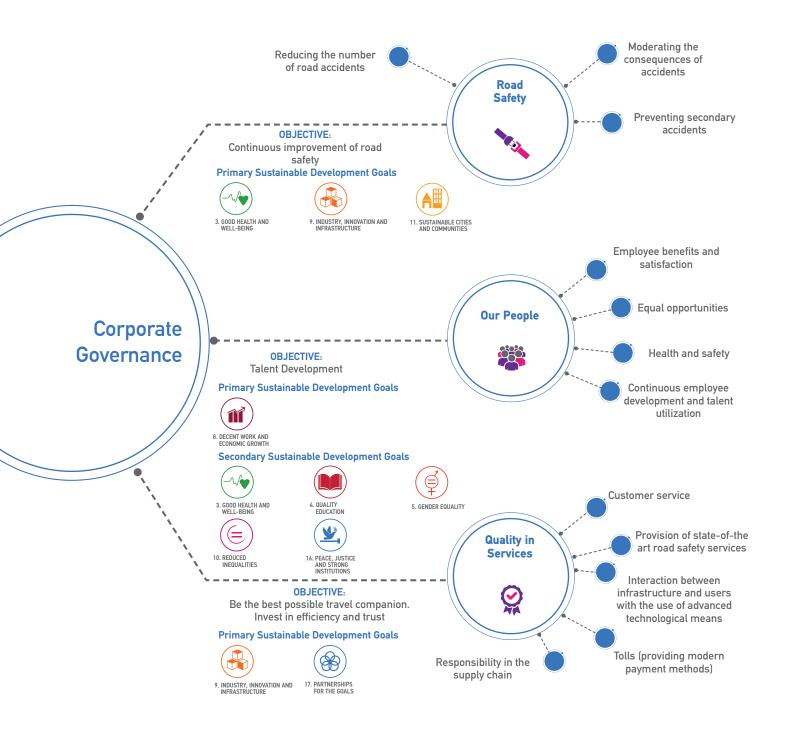


Material for Nea Odos



| Nea Odos
Corporate
Responsibility
Material topics | Direct Stakeholders | | | | | | | | | | | Indirect
Stakeholders | | | Boundary
of
material
topics | | |
|--|---------------------|------------------|-------------------------|--------------|--|--------------------|------------------------|---|-------|--------------------|-------------------|---|-------|-----------------|--------------------------------------|------------------|---|
| | 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 | SDGs |
| | | | | | | | CORP | ORATE GO | VERN. | ANCE | | | | | | | |
| Zero corruption and transparency | | | • | • | - | | | | | • | | - 1 | | | • | • | Primary |
| Ethical governance | | | | | - | | • | • | | | | - | | | • | • | 16, 17 |
| | | | | | | | | ROAD SA | FETY | | | | | | | | |
| Safety of drivers | | | | - | • | • | • | • | - | | | • | • | • | • | | Primary |
| Suitability of signage | | - | • | • | • | - | | | • | | • | | | • | • | | 3, 9, 11 |
| Technology | • | - | | • | | - | - | • | | | | | | • | • | • | Secondary
17 |
| | | | | | | | QUA | ALITY IN S | ERVIC | ES | | | | | | | |
| Financial performance/ market presence | | | - | • | - | | | | - | - | • | | | | • | | |
| Suppliers environmental assessment | - | | | - | | | | • | | | - | | | | • | | Primary
9, 17 |
| Interoperability | | | | | | | | • | | | • | | | • | • | • | |
| Toll rates | | | | | - | | • | | | | • | | | • | • | • | 7, 17 |
| Private data protection | | | | | | | | | | | • | | | | • | • | |
| | | | | | | | HU | MAN RES | OURC | ES | | | | | | | |
| Employment | • | | | - | - | | | | | | • | | • | | • | | |
| Meritocratic recruitment procedures | - | • | • | | - | | | • | | | - | | | • | • | | |
| Training and education | | | | | | - | | | | | | - | | | • | | Primary |
| Development and performance management | • | • | | | | | | | | | | - | | • | • | | 8
Secondary
3, 4, 5, 10, 16 |
| Equal opportunities and diversity | - | • | | | • | | | | • | | • | | | | • | | |
| Non-discrimination | | • | | | • | | | | • | | • | | | | • | | |
| Occupational Health and Safety | • | • | | | • | • | | | | | | • | | | • | | |
| | | | | | | | | ENVIRON | MENT | | | | | | | | |
| Fuel consumption | - | • | | - | • | | • | | • | | | | • | | • | | |
| Energy consumption | • | • | • | • | - | | • | • | • | | | - | • | | • | | Primary
12, 13
Secondary
3, 6, 7, 11, 15, 17 |
| Effluents and waste | • | • | • | | - | | | • | • | | • | - | • | • | • | • | |
| Noise management | • | - | • | • | • | | | | • | | • | | • | • | • | | |
| Emissions | • | • | | | - | • | | • | • | | • | | • | • | • | | |
| Biodiversity | - | - | - | | • | | | | • | | • | | • | | • | | |
| Environmental compliance | • | - | • | • | • | - | • | | - | | • | | • | | • | • | |
| Accidental pollution | _ | | | | - | | | | | | | | • | | • | • | |
| | | | | | | | | SOCIE | | | | | | | | | P : |
| Indirect economic impacts | - | - | - | | - | | - | | - | | - | • | • | | • | • | Primary
17 |
| Presence in the local community | | | | | • | | | | | | • | | - | | • | • | Secondary
1, 3, 4, 11, 16 |





34

Global Reporting Initiative (GRI)

Since our very first Report for 2014, we have been adhering to international initiatives and best practices to desclose our strategy, priorities and practices. We believe that communication of our approach is an integral part of our responsibility towards our social partners. The GRI Standards, which we commenced using in the 2016 Report, enables us to report and communicate our corporate approach as regards Sustainability in a credible, and structured manner, and to keep track of how we monitor our data.

Sustainable Development Goals (SDGs)

The 17 UN Sustainable Development Goals (SDGs) are a driving force for moving to new business models and addressing the biggest and most pressing economic, social and environmental challenges of humanity. For Nea Odos, they are an important reference framework for determining our priorities and recognizing the degree of impact of these issues on our operations and business activities.





| Connection to | | 2018 | Ŷ | 2019 | | |
|--|--|---|-------------------------------|---|--|--|
| the Sustainable Development Goals | Торіс | Goal | Progress | Goal | | |
| 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Stakeholder | Implementation of users' recommendations as captured in the motorway user survey on Corporate Responsibility | Repeat user
survey in 2019 | Implementation
of users'
recommendations
Repeat user survey
in 2019 | | |
| | Engagement | Development of online scorecard to improve communication and access to corporate information for stakeholders | New | Complete Scorecard | | |
| 4. QUALITY
EDUCATION | Employee training on
Corporate responsibility | Employee training
on CSR and
Sustainability as part
of the material topics
review process | Completed | | | |
| | and Sustainability | Seek and incorporate
employee input in
the revised material
topics | Completed | | | |



Primary Sustainable Development Goals







9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES AND COMMUNITIES

Secondary Sustainable Development Goals



In 2018, Nea Odos dedicated:

221,269 hours to road maintenance **44,295 hours** to road infrastructure repairs

34,835 hours hours to road infrastructure inspections

60,013 hours to snow removal



At Nea Odos, we focus on promoting road safety and we are responsible for controlling, closely monitoring and upgrading all those elements that fall within our jurisdiction. We deliver safe and modern motorways to the public, and we are constantly working to protect human life.

Our responsibility starts with the design and construction part of the infrastructure, which must respond effectively to any difficulty, to the geotechnical challenges, the particular geological conditions and the reliefs of each region. The high standards of motorway construction are the main priority during the geometric design, the traffic and safety signage studies.

4.1 Caring for Safety

Our concern for high-level road safety starts from the moment we undertake the construction of the motorway. The company fully complies with the Greek and European legislation, its obligations under the Concession Agreement and undertakes specific initiatives such as safety concerning the vehicles, the road infrastructure, and holistic safety management (post-crash care).

At the core of our strategic approach and our daily operations lies our goal towards the safe transport of every driver and of minimizing road accidents. In this context, our priorities have three key pillars:

- Reduction of the number of road accidents
- Reduction of the impact of road accidents
- Taking measures to prevent secondary accidents

Signage

The role of the signage in maintaining a high level of road safety is of particular importance. Both the design and maintenance are of crucial importance for ensuring and constantly improving road safety and contributing to sustainable mobility.

Signage categories:

- Emergency signage: used for immediate intervention in the event of an incident.
- Mobile signage: used during movable works such as sweeping, road surface marking as well as in cases of "mobile events", i.e. escort of a special load.
- Short-term works signage: temporary signage used during short-term works, as well as for important incidents (updating of emergency signage).
- Long-term works signage: temporary signage used during long-term works.

The signage studies conducted are fully harmonized with the national and European legislation and approved by the Independent Engineer (certification number: DAC0596B).

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 in place 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.

4.2 Infrastructure Management and Maintenance

The maintenance of our motorways is the top priority of the technical department and is crucial for road safety and customer service. Given that the motorways operate on a 24-hour basis, 365 days a year, they have increased maintenance needs to maintain a high level of engineering and infrastructure safety.

In order to respond to this, Nea Odos prepares and follows an integrated preventive and improvement 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.

This **preventive maintenance program** covers the largest part of the entire maintenance program. It 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 concerns large — scale works. It includes pavement replacement, heavy interventions in engineering projects and building facilities, and the totality of the investment for modernizing all electromechanical infrastructure and electronic equipment. The above 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.

| | } | 2018 | | 2017 | 2016 |
|--|-------------------|------------|------------|-------------------|-------------------|
| Road Maintenance by Category | Total
NEA ODOS | A.Th.E. | IONIA ODOS | Total
NEA ODOS | Total
NEA ODOS |
| Green Areas and Trees | 59,821.25 | 33,915.15 | 25,906.10 | 51,860.5 | 24,830 |
| Cleanliness | 57,810.75 | 37,177.75 | 20,633 | 19,966.4 | 10,077.8 |
| Motorway drainage system | 12,162.03 | 7,147.12 | 5,014.92 | 11,106.3 | 13,743.2 |
| Road Surface | 11,534 | 10,987 | 547 | 6,121.8 | 2,418.2 |
| Buildings | 8,043.31 | 3,055.31 | 4,988 | 4,299.5 | 1,968.1 |
| Other (material transportation, tidiness, training, etc) | 4,840.03 | 2,808.10 | 2,031.93 | 3,649.6 | 1,548.1 |
| Tunnels, Cut and Cover, Landfills and Trenches | 2,735.50 | 2,002.98 | 732.52 | 3,015.7 | 1,545.4 |
| Motorway Signage | 10,588.42 | 8,946.78 | 1,641.63 | 1,789 | 3,112.4 |
| Shoulder, traffic islands, kerbs-gutters and sidewalks | 2,924.38 | 2,346.95 | 577.43 | 1,652.4 | 1,530.2 |
| Motorway Safety and Protection Equipment | 6,256.45 | 5,584.95 | 671.50 | 1,495 | 1,341.5 |
| Common and Special Bridges | 421 | 318.92 | 102.08 | 657.3 | 407.4 |
| Support walls and avalanche retaining walls | 910.63 | 836.72 | 73.92 | 340.6 | 458.6 |
| Winter Maintenance | 43,221 | 26,045 | 17,176 | 253.0 | - |
| Firefighting | - | - | - | 8,4 | 32.3 |
| Signage bridges | - | - | - | - | 6.3 |
| Total | 221,269.75 | 141,172.72 | 80,096.03 | 106,215.3 | 63,019.4 |

| Electromechanical Equipment Maintenance | 2018 | 2017 |
|--|------|------|
| Total maintenance tasks in electromechanical equipment | 117 | 117 |
| Total maintenance tasks in electromechanical equipment for tunnels | 43 | 43 |

Manhours for Road Maintenance

| Ξ. | 3,939.5
meters | IONIA ODOS | 2,020
meters |
|----|-------------------|------------|-----------------|

Total Total Total **Categories of Road Infrastructure** NEA ODOS **IONIA ODOS** NEA ODOS NEA ODOS A.Th.E. Motorway Safety and Protection Equipment 9,948.57 4,556.40 Road Surface 1,835.62 4,606 10,828.12 8,992.50 14,771 3,041.14 548.4 Motorway Signage 3,678.37 5,538.97 Motorway drainage system 4,774.60 764.37 3,157.2 876.7 **Buildings** 3,564.4 Shoulder, traffic islands, kerbs-gutters and sidewalks 444.92 156.82 288.10 755.4 Other (material transportation, tidiness, training, etc.) Common and Special Bridges 420 170 250 228.5 1 Tunnels, Cut and Cover, Landfills and Trenches Cleaning 186 178 55 254 Winter Maintenance 48 48 -42.5 Support walls and avalanche retaining walls Signage bridges 53 Green Areas and Trees 53 44,295.08 35,524.97 8,770.11 41,280.6 24,497.8 Total

2018

Roadside barriers that were replaced





2017

2016

| | | 2018 | | ĵ 2017 | 1 2016 |
|--|-------------------|-----------|------------|-------------------|-------------------|
| Road Infrastructure per Category | Total
NEA ODOS | A.Th.E. | IONIA ODOS | Total
NEA ODOS | Total
NEA ODOS |
| Winter Maintenance | 16,423.90 | 9,342 | 7,081.90 | 14,147 | 6,912 |
| Tunnels, Cut and Cover, Landfills and Trenches | 1,941.66 | 767.93 | 1,173.73 | 4,700.4 | 16 |
| Motorway Safety and Protection Equipment | 8,332.91 | 941.57 | 7,391.34 | 3,676.3 | 23.8 |
| Road Surface | 1,263.61 | 938.43 | 325.18 | 2,324.5 | 134.9 |
| Motorway drainage system | 864.57 | 574.75 | 289.82 | 1,386.9 | 1.7 |
| Motorway Signage | 4,251.65 | 866.08 | 3,385.57 | 1,366.6 | 7.4 |
| Cleanliness | - | - | - | 620 | - |
| Common and Special Bridges | 440.48 | 369.90 | 70.58 | 501.2 | - |
| Support walls and avalanche retaining walls | 403 | 304 | 99 | 333 | |
| Shoulder, traffic islands, kerbs-gutters and sidewalks | 360.18 | 224.50 | 135.68 | 244.5 | - |
| Buildings | 93 | 48 | 45 | 154 | - |
| Green areas and trees | 136 | 104 | 32 | 100 | - |
| Other (material transportation, tidiness, training, etc) | 321 | 196 | 125 | 37 | - |
| Signage bridges | 3.84 | 3.77 | 0.07 | 4.8 | - |
| Total | 34,835.81 | 14,680.94 | 20,154.87 | 29,596.2 | 7,095.8 |

per Category

Tunnel Enhancement Program

The upgrading of the Traffic Management System used in the tunnels of the Aghios Konstantinos and Kammena Vourla bypass was completed in 2018 aimed at the safe and proper operation of the tunnels, the motorway and the surrounding areas.

The project aims to manage the road section through the use of electronic means and complementary infrastructure projects. Upon completion of the works, Emergency Phones are provided at distances that do not exceed 50m each. At the same time, it optimizes traffic management in tunnels that are already in operation, and especially via the variable speed limit signs (VSLSs), traffic management is optimized given that in the event of emergencies or during maintenance works, the speed limit is dynamically defined within the permissible limits inside and outside of the tunnel.



New Equipment

| | New CCTV Cameras | New Emergency Phone
Devices | Overheight Vehicle Detection
System |
|--|------------------|--------------------------------|--|
| Dichalorema Tunnel (Branches and Connecting roads) | 24 | 16 | 1 |
| Knimida Tunnel (Branches and Connecting roads) | 89 | 71 | 1 |
| Tunnels S3 – S6 (Branches and Service roads) | - | - | 1 |
| Total | 113 | 87 | 3 |

New Signs

| | Variable Speed Limit
Signs | Lane Control Signs | Variable Message Signs |
|--|-------------------------------|--------------------|------------------------|
| Dichalorema Tunnel (Branches and Connecting roads) | 6 | 8 | 2 |
| Knimida Tunnel (Branches and Connecting roads) | 22 | 11 | 2 |
| Tunnels S3 – S6 (Branches and Service roads) | - | 12 | 1 |
| Open Road | 12 | - | 3 |
| Total | 40 | 31 | 8 |

New Traffic Lights and Signs

| | Multisigns | Three-Coloured Traffic Lights | Two-Coloured Traffic Lights |
|-----------|------------|-------------------------------|-----------------------------|
| Open Road | 3 | 14 | 14 |
| Total | 3 | 14 | 14 |

Winter Maintenance and Acute Weather Phenomena Management

The winter maintenance program requires exceptional management, sound coordination and compliance with specific, certified procedures so that there is immediate response in the case of acute weather phenomena, such as heavy snowfall or frost on the pavement.

The winter maintenance program focuses on:

- 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 program which Nea Odos implements is supported by the operation of the following snow removal centres:

- Varympompi
- Markopoulo
- Schimatari
- Thiva
- Akraifnio
- Martino
- Tragana
- Latomeio





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

1

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



We mobilise all road safety patrol cars

We apply the emergency safety and intervention procedures

43

Winter maintenance



hours of snow removal



subcontractor's snow removal vehicles



Nea Odos' small snow removal vehicles

IONIA ODOS







subcontractor's snow removal vehicles



Nea Odos' small snow removal vehicles

Structural Adequacy

Since the commencement of its operations, Nea Odos has set stringent safety rules to protect drivers from dangerous incidents. Taking precautionary measures, the Technical Department of Nea Odos designed a program to monitor the structural adequacy of concrete structures, which is the basic tool for planning its maintenance work. This program includes an integrated planning of regular inspections and systematic interventions covering a total of 350 large technical sections, bridges and upper and lower crossings.

The aim of the program is to record the findings of visual inspections carried out in the field, its evaluation according to international standards, so that needs are identified, and priorities are set and where deemed necessary, audits and interventions are carried out. In this manner, the structural adequacy of the project constructions is maintained at the highest possible level and the structural integrity of the motorways is ensured.

Preparedness exercise at the Aghios Konstantinos and Kammena Vourla Tunnels

An impressive full-scale preparedness exercise was conducted at the Aghios Konstantinos and Kammena Vourla tunnels in the Spring of 2018 with the aim of constantly improving the services provided. The exercise was carried out with the participation of the motorways traffic control, the National First Aid Centre, the Greek Special Emergency Response Unit and the Fire Brigade. The scenario implemented involved completely blocking all lanes. Recognizing that road infrastructure is the central element of the road transport system, where a number of involved parties is responsible for ensuring and improving road safety, we undertook actions of preparedness, mobilizing and training the different parties, taking care of their coordination and implementing our plan for road safety and zero accidents.

We inspect the infrastructure and our equipment

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

We continuously inform users via all available communication channels



44

GRI 416-1

Traffic Management and Tunnel Traffic 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 smooth operation of the motorways.

The centres are of crucial significance for the efficient management of traffic and hence they employee dedicated experts and skilled employees equipped with the most advanced technical and technological equipment. These centres receive emergency calls, collect and examine important information, and analyse traffic data. In addition, when necessary, they mobilize the Road Safety Patrol Cars and inform all emergency services such as the National First Aid Centre, the Civil Protection, 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 Traffic and the Tunnel Management Centres are supported, supplemented and completed by:

1. The Road Safety Patrol Cars

2. The Free Road Assistance Service

3. The SOS Phones installed along the entire motorway

4. The 4-digit 1075 emergency number

The Maintenance Centres are located at

-Markopoulo (Maintenance Building)

-Thiva (Maintenance, Fire and Police Buildings)

-Atalanti (Maintenance, Fire and Police Buildings)

| | A. 1 | A.Th.E | | A ODOS |
|------------------------------|---------------|--------|-------------|--------|
| | , 2018 | 2017 | 2018 | 2017 |
| Variable Message Signs (VMS) | | | | |
| Number of signs (VMS) | 30 | 18 | 26 | 26 |
| Traffic Surveillance Cameras | | | | |
| Open-air CCTV | 11 | 06 | 1 | 32 |
| Tunnel CCTV | 1: | 134 | | 50 |
| | | | | |

Road Safety Patrols

The Road Safety Patrols operate 24 hours a day along the motorway to intervene where deemed necessary and to assist any vehicle that might be in need. Their role is crucial for road safety as their purpose is to be as soon as possible on the side of each driver in case of need. In particular, they undertake:

- 1 Inspection of the equipment, pointing out damage that might have occurred and spotting potential hazardous situations for commuters on a daily 24-hour basis.
- 2 Directly handling incidents and providing assistance to immobilised vehicles

Their main responsibilities include:

- Locating and managing incidents
- Instant intervention patrolling
- 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, in accordance with the relevant European Directive
- Identifying imminent risks for the motorway users

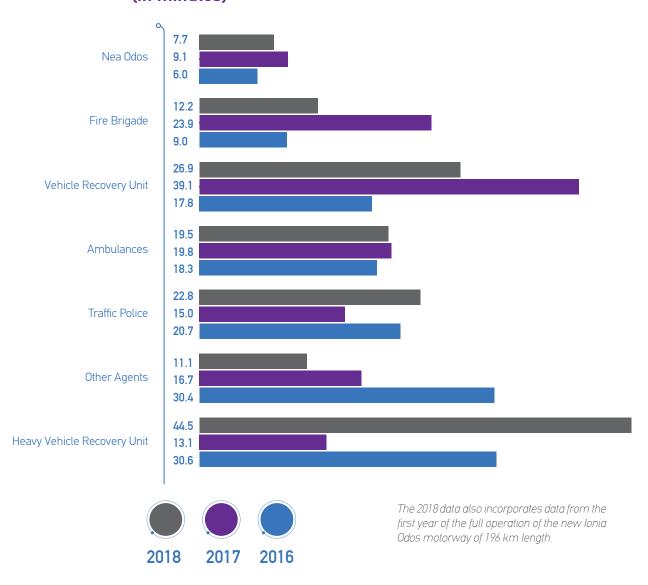
Total Incidents by Category

| Incidents | 2018 | 2017 | 2016 |
|--------------------------------------|--------|--------|--------|
| Vehicles breakdown | 22,458 | 19,092 | 12,340 |
| Obstacles – Spillage – Moving Hazard | 14,973 | 12,171 | 6,513 |
| Other incidents | 5,558 | 2,859 | 1,264 |
| Accidents and Crashes | 1,461 | 1,358 | 1,096 |
| Abandoned Vehicles | 427 | 401 | 278 |
| Total | 44,877 | 35,881 | 21,491 |

Nea Odos Average Response Time by Incident Type (in minutes)

| Incidents | 2018 | 2017 | 2016 | |
|--------------------------------------|------|------|------|--|
| Accidents and Crashes | 10.3 | 10.6 | 8.3 | |
| Vehicles breakdown | 7.5 | 8.3 | 5.9 | |
| Abandoned Vehicles | 4.4 | 4.5 | 1.9 | |
| Obstacles – Spillage - Moving Hazard | 8.7 | 10.3 | 6.1 | |
| Other incidents | 4.8 | 9.8 | 6.4 | |

Average Response Time by Agent (in minutes)



Immobilised Vehicle Management

Nea Odos guarantees the smooth and safe operation of the motorways the company is responsible for, offering free collection and transport service of immobilized vehicles. In the context of this service, the company's collection units transfer the immobilized vehicles to the nearest safe point, which may be an area at the rest of the road network or at a secure location within the Concession project, such as Motorist Service Stations. This prevents traffic problems and protects the driver and the passengers of the immobilized vehicle.

During 2018, more than 7,000 vehicles were safely towed away, 793 of which were heavy vehicles.

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

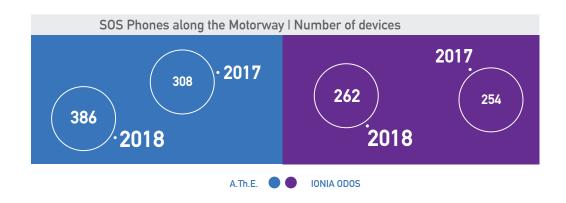
GRI 103-3, GRI 416-1 47

| Immobilised Vehicles | | |
|---|---------|------------|
| Incidents | A.Th.E. | IONIA ODOS |
| Flat tire | 2,757 | 1,081 |
| Mechanical failure | 7,685 | 3,677 |
| Fuel | 1,174 | 625 |
| Other | 1,438 | 926 |
| Unrecorded | 1,279 | 1,750 |
| Total | 14,333 | 8,059 |
| Driver sickness (it is a separate event and it is not included in the report of immobilised vehicles) | 94 | 27 |

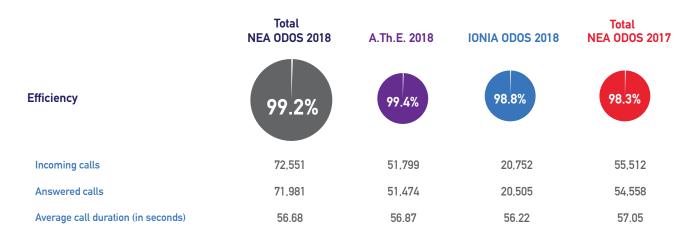
The SOS Phones and the 4-digit 1075 Emergency Number

The 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.

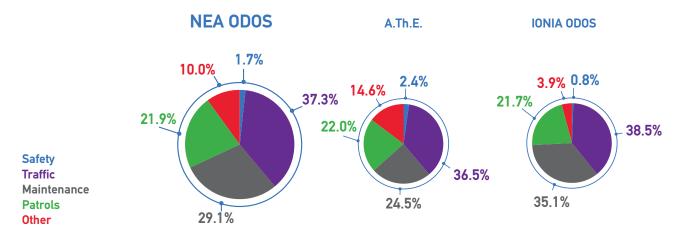
The 4-digit 1075 emergency number: Users are able to directly communicate with the Traffic and Tunnel Management Centres in order to provide information regarding emergency incidents, by calling the 1075 emergency number.



Emergency Call Centre data



Emergency Call Centre - Issues by Category



4.4 Awareness Campaigns

It has become clear that achieving zero accidents is directly linked to both the quality of the technical characteristics of the motorways and the road safety culture.

Taking into account the key role of human behaviour, beliefs and attitudes adopted during driving, as well as the way drivers interact with the road environment, our initiatives emphasize improving driving behaviour.

The three main axes that we focus on for creating, cultivating and enhancing the knowledge-based safe driving culture are:

A) 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, convinced that road user education is primarily a matter of education, we at Nea Odos support actions of a wider geographic scope aiming at informing and raising the awareness of the general public on issues of road safety.

B) Information and awareness campaigns

Throughout the year, we implement awareness campaigns for

drivers. The main topics we focus on are driving under difficult weather conditions, good driving behaviour within a highway, specific road safety parameters within tunnels, proper use of child seats, non-aggressive driving and eco-driving, etc. Our campaigns include mainly briefings on our website and distribution of leaflets at toll stations.

C) Conference 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.

| Connection to | | 2018 | | | | | |
|---|-----------------------------|---|---|---|--|--|--|
| the Sustainable Development Goals | Topic | Goal | Progress | Goal | | | |
| 3. GOOD HEALTH AND WELL-BEING 11. SUSTAINABLE CITIES AND COMMUNITIES | Accident related indicators | Zero accidents on
motorway (refers to
users and employees) | Users: 1,461
Employees: 8 | Zero accidents on
motorway (refers to
users and
employees) | | | |
| 3. GOOD HEALTH AND WELL-BEING 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE 11. SUSTAINABLE AND COMMUNICATION AND INFRASTRUCTURE | | Extensive renovation
work on the tunnels of
Aghios Konstantinos | Completed | | | | |
| 3. GOOD HEALTH AND WELL-BEING | Accident response time | Reduction of response time | Average response
time reduction from
9.1 min to 7.7 min | ongoing | | | |
| 3. GOOD HEALTH AND WELL-BEING | Annual Recertification | Annual Recertification:
ISO 39001:2012 | Completed | Annual
Recertification | | | |



QUALITY SERVICE PROVISION

Primary Sustainable Development Goals



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE

Secondary Sustainable Development Goals



17. PARTNERSHIPS

In 2018, Nea Odos:

invested €112,982,400 to local and national suppliers

managed 76,513 customer calls and messages

invested €591,070 for Fast Pass subscription programs

5.1 Our Customer-Centred Services

At Nea Odos, we go beyond our contractual obligations, and the framework set by the Greek and European legislation and apply an anthropocentric service model based on the principles of Corporate Responsibility. In this context, we

upgrade the processes and internal organizational systems in order to respond to the growing needs of the areas adjacent to our motorways and the motorway's own operational requirements.

Our strategic decisions and initiatives assist us in constantly improving:

- our internal efficiency
- the quality and efficiency of our services
- the timeframe in which we meet the demands and requirements of our internal and external participations

Since 2009 when we first applied the ISO 9001 standard as the minimum requirement of the Concession Agreement, we have adopted, applied and certified the ISO 14000, OHSAS 18001 and ISO 39001 standards, demonstrating that we constantly aim at implementing new ways to further improve the level of the services rendered.

Our main concern is to make each user feel that we are their best travel companion.

GRI 102-15 51

5.2 Direct Communication with Drivers

Our company uses the following channels of communication with drivers and infrastructure visitors:

- The Customer Care Call Centre at 222950 26900 number
- The Customer Service Centre located in:
 - 1. A.Th.E. motorway, right before the Afidnes Toll Station, towards Lamia
 - 2. Ionia Odos motorway, right before the Klokova Toll Station, towards Ioannina and also at the Motorist Service Station at Episkopiko, towards Antirrio
- The Customer Service Email Address customercare@neaodos.gr
- The corporate website www.neaodos.gr
- Opinion surveys conducted every 18 months

Nea Odos systematically communicates with all its stakeholders and:

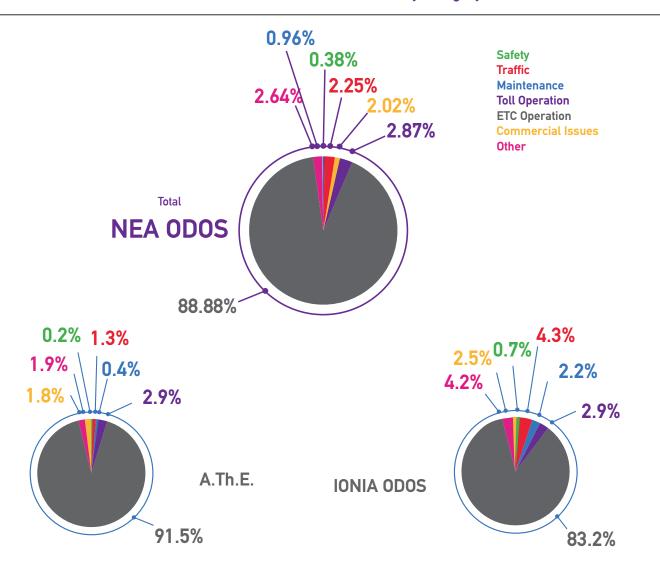
- It is officially informed of their views on its activities
- Regularly gathers official opinions and records credible trends
- Records any issues that arise and resolves them immediately and effectively
- Encourages communicating ideas and identifying possible omissions
- Informs about its strategy actions
- Updates on its operational issues



Customer Care Call Centre data

| / | • | 2018 | Ç | 2017 | | |
|--|----------------|---------|------------|----------|---|--|
| | Total NEA ODOS | A.Th.E. | IONIA ODOS | NEA ODOS | | |
| Incoming calls | 70,445 | 44,371 | 26,074 | 79,986 | | |
| Answered calls | 61,459 | 37,759 | 23,700 | 69,336 | | |
| Efficiency | 87.3% | 85.1% | 90.9% | 87.8% | و | |
| Total complaints submitted by phone | | 2,969 | | 2,619 | و | |
| Number of calls with complaints about noise barriers | | 1 | | 4 | | |

Customer Care Call Centre - Issues by Category



GRI 103-1 53

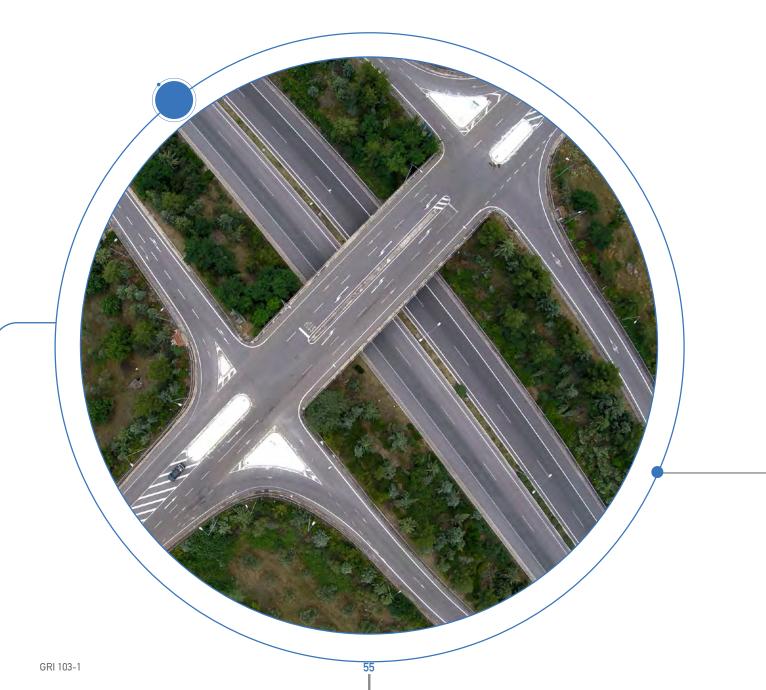
| Written Communication - | 2018 | | | | | | |
|-------------------------|-----------------------|---------|------------|--|--|--|--|
| Issues by Category | Total NEA ODOS | A.Th.E. | IONIA ODOS | | | | |
| Safety | 0.1% | 0.1% | 0.1% | | | | |
| Traffic | 0.0% | 0.0% | 0.0% | | | | |
| Maintenance | 0.4% | 0.4% | 0.3% | | | | |
| Toll Operation | 7.4% | 9.2% | 5.1% | | | | |
| ETC Operation | 89.7% | 87.8% | 92.1% | | | | |
| Commercial Issues | 0.5% | 0.4% | 0.8% | | | | |
| Compensation Claims | 0.5% | 0.6% | 0.2% | | | | |
| Other | 1.4% | 1.5% | 1.4% | | | | |

Out of the 61,459 calls handled by the Customer Service Department, 2,969 (4.8%) concerned complaints.

| • | Written Co | , | | |
|---|-------------------|---------|------------|-------------|
| | | 2017 | | |
| | Total
NEA ODOS | A.Th.E. | IONIA ODOS | NEA ODOS |
| Total requests and complaints submitted | 15,054 | 8,902 | 6,152 | 12,974 |
| Requests and other issues | | 14,697 | | 12,513
, |
| Complaints submitted | | 357 | | 461 |
| Complaints about noise barriers | | 5 | | 3 |
| Average response time (days) | 0.37 | 0.47 | 0.21 | 0.52 |

In total, we received, handled and solved a total of 3,326 complaints in 2018, which in accordance with our policies fall into 8 main categories: Toll operations (1,151), Traffic and security (1,018), Miscellaneous (530), Commercial policy (243) Driver Requests (179), Signage (161), Interoperability (31) and Motorway Project (13). However, we did not receive any report nor any complaint about major environmental issues.

| Complaints by Category | Customer Care Call Centre | | Writt
Commun | | Total ° | | |
|------------------------------------|---------------------------|--------|-----------------|--------|---------|--------|--|
| | Number | % | Number | % | Number | % | |
| Toll operation | 1,051 | 35.4% | 100 | 28.0% | 1,151 | 34.6% | |
| Traffic and safety | 920 | 31.0% | 98 | 27.5% | 1,018 | 30.6% | |
| Other | 489 | 16.5% | 41 | 11.5% | 530 | 15.9% | |
| Commercial policy | 228 | 7.7% | 15 | 4.2% | 243 | 7.3% | |
| User requests (compensations etc.) | 106 | 3.6% | 73 | 20.4% | 179 | 5.4% | |
| Signage | 136 | 4.6% | 25 | 7.0% | 161 | 4.8% | |
| Interoperability | 28 | 0.9% | 3 | 0.8% | 31 | 0.9% | |
| Constructions | 11 | 0.4% | 2 | 0.6% | 13 | 0.4% | |
| Total | 2,969 | 100.0% | 357 | 100.0% | 3,326 | 100.0% | |



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 no case can the company unilaterally modify the toll rates.

Toll payment zones

At this stage, and in accordance with the institutional framework of Nea Odos, at P.A.Th.E. motorway, three toll zones are identified and four zones for Ionia Odos.

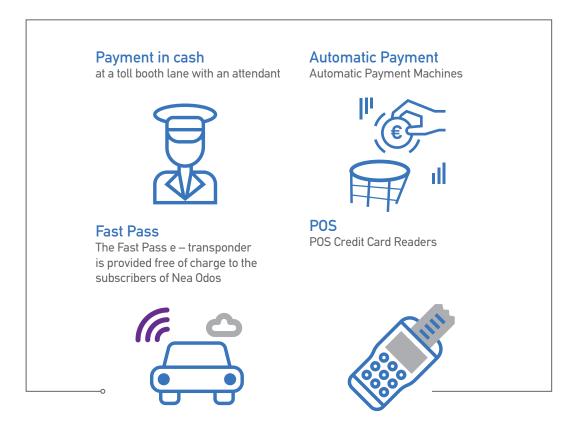
More information is available at: https://www.neaodos.gr/tolls/?lang=en

The toll rate for each station 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.

The toll rates for a route varies depending on the vehicle category and the motorway zone in which the driver is traveling. Under no circumstances can any user who has paid the toll fee at the frontal station pay again at a lateral station in the same zone, during the same journey.

Payment Methods



Subscription programs for Permanent Residents and Frequent Users



All four- wheeled category 2, 3 and 4 vehicles can subscribe at the Fast Pass Basic program



The Fast Pass Frequent special program offers incremental discounts up to 50% depending on the frequency of your monthly passages from the Afidnes, Kapandriti, Malakasa and Inofita Toll Stations and applies for Category 2 vehicles.



The Fast Pass Oropos special program is exclusive for Oropos Municipality permanent residents with a fixed price per passage from the Afidnes toll station and applies for Category 2 vehicles.

For more information on the available subscription programs, Nea Odos created a dedicated website: www.fastpass.gr

- In 2018, our investment in Fast Pass OROPOS reached €329,563.10
- In 2018, our investment in Fast Pass Frequent €261,506.94
- In 2018, we invested a total of €66,913.91 at the discount program for the permanent residents of Akraifnio, Kokkino and Kastro communities

The program for the residents of Akrafnio, Kokkino and Kastro, was implemented in 2018 with the aim of providing free passages through the Thiva Frontal Toll Station for vehicles of category 2. In particular, following the closure of an illegal business connection with the motorway and due to incomplete maintenance of the side road network by the competent authorities, Nea Odos agreed to provide free passages to the

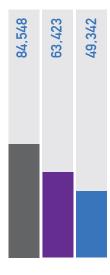
residents of the above communities, from the Frontal Toll Station. In order to implement this commitment, we have been in contact with the Municipalities of Thiva and Orchomenos, and together we have organised a clear framework for cooperation and have proceeded to provide free passage cards to the following groups:

- Residents of the Municipality of Thebes who work at LARKO and generally at enterprises in the area of the Akraifnia Municipal Unit, Municipality of Orchomenos (that is, the areas of Akrafnio, Kokkino, Kastro and the surrounding area)
- Farmers/residents of the Municipality of Thebes with agricultural properties in the area of the Akraifnia Municipal Unit,
 Municipality of Orchomenos (that is, the areas of Akrafnio, Kokkino, Kastro and the surrounding area)
- Residents who, for various family and social reasons, drive on a daily basis in the area of the Akraifnia Municipal Unit
 and vice versa

Evolution of ETC Transponders and Accounts for Fast Pass



Number of current Accounts by the end of the month (average)



Total number of active Transponders by the end of the month (average)





5.4 Provision of Additional Services

Motorist Service Stations:

Motorist Service Stations: Along the motorways that we maintain and operate there are the following Motorist Service Stations serving mainly refuelling and catering needs on a 24-hour basis:

A.Th.E.

| Motorist Service Stations | POS. | DIRECTION | FACILITIES |
|---------------------------|----------|------------------------|--|
| Varimpompi | 24+535 | To Athens | Gas Station B.P.
Mini Market
Gregorys Tastes |
| Kapandriti | 36+455 | To Lamia | Gas Station B.P.
Mini Market
Mc Dondald's
Gregorys Tastes |
| Malakasa | 47+875 | To Athens,
To Lamia | Gas Station EKO
FLOCAFE
Goody's
Car Wash
Mini Market – Bookstore |
| Schimatari | 70+700 | To Athens,
To Lamia | Gas Station EKO
Everest
Restaurant "Ελιά & Λάδι"
Mini Market – Bookstore
ATM |
| Atalanti | 144 +200 | To Athens,
To Lamia | Olympus Plaza
Gas Station SHELL |

Ionia Odos

| Motorist Service Stations | POS. | DIRECTION | FACILITIES |
|---------------------------|---------|---------------------------|--|
| Evinochori | 27+182 | To loannina | Gas station Avin
Goody's
Flocafe
Easy Market |
| | | To Antirio | Gas station Avin
Olympus Plaza
Ελιά & Λάδι
Easy Market |
| Filipiada | 86+215 | To Ioannina
To Antirio | Gas station Shell
Charge station for electric cars
AB Shop & Go
I love CAFE |
| Amfilochia | 100+560 | To Antirio | Gas station Shell
AB Shop & Go |
| Ambrakia | 154+130 | To Ioannina | Gas station Shell
AB Shop & Go |
| Episkopikou | 194+870 | To loannina
To Antirio | Gas station Avin
Olympus Plaza
Ελιά & Λάδι
Mini Market |

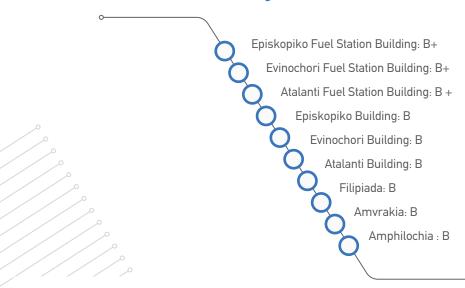


5.5 Best Practices for the Operation of the Motorist Service Stations

The main pillars of the general design of the Motorist Service Stations are the following:

- 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 integrated energy design of the buildings, in compliance with the requirements of the Building Energy Performance Regulation for the purpose of improving their energy efficiency, saving energy and protecting the environment.

According to the results of energy inspections, the energy performance of the Motorist Service Stations buildings is as follows:



Energy Management

The energy requirements of the Motorist Service Stations are covered to the maximum possible level from renewable energy sources (e.g. solar water heating, bioclimatic interventions in the design of buildings and the surrounding environment, etc.). An important design parameter is the energy efficiency of buildings, to which end the best available design and construction choices are used, going beyond the minimum requirements of the existing legislation where deemed appropriate (3661/2008, and 3851/2010 Laws and the Building Energy Performance Regulation).

Water Management

During the environmental licensing of the Motorist Service Stations, a number of directives on water protection and the sustainable use of water were taken into account . River Basin Management Plans were developed for each Water Unit, which set conditions, constraints and guidelines for the

implementation of sustainable water management policies, such as water saving and reuse measures.

In order to ensure a balance between groundwater aquifer pumping and replenishment, the use of treated wastewater and through this, saving water resources from other sources have been promoted. In particular, treated wastewater that has undergone a biological sewage treatment is used for irrigation, cleaning and firefighting. These practices result in less water consumption from other sources, such as groundwater from drilling. Moreover, for the publication of the environmental terms of Motorist Service Stations, the consent of the relevant department, that is the Water Directorate of the relevant Decentralized Administration, was also requested. The Water Directorate gave positive, conditional opinions. One of the conditions is the re-use of treated effluents from the biological sewage treatment.

Electric Mobility Motorway

Ionia Odos is the first motoway in the country to provide highspeed charging areas for electric vehicles. All Motorist Service Stations at Ionia Odos enable electric car drivers to charge their vehicles in a short period of time.

With this initiative we look forward to contributing to the deployment of electric chargers at the rest of the country's motorway network and in general to the deployment of electric mobility, which is still in its infancy in Greece.

In addition, as Ionia Odos is connected to the port of Igoumenitsa via Egnatia Motorway, we also offer travellers with electric cars the opportunity to seamlessly include Greece into their journey. Finally, with the existence of high-speed charging areas for electric vehicles in all Motorist Service Stations of the motorway, the conditions for reducing the environmental footprint of the motorway are created.

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.

Personal Data Management

For Nea Odos, the protection of personal data and ensuring the privacy of drivers is of paramount importance.

Therefore, we apply appropriate technical and organizational measures to securely collect, store and manage/process personal data and to prevent accidental loss or destruction

and unauthorized and/or illegal access to the data, its use, modification or disclosure. Especially as regards securing electronic transactions, the company applies special procedures and security standards.

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 services 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 from the closed TV circuit in the Traffic Management Centre, as defined by the relevant "Closed Circuit Television Directive" of the Personal Data Protection Authority



5.6 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.

Choosing Partners, Subcontractors and Suppliers

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.

In this context, the Quality Management System implemented by Nea Odos describes bounding procedures for managing procurement projects and relationships with suppliers.

More specifically, it includes indicatively:

- 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

The following are also provided for its subcontractors:

- a) the obligation to sign a declaration of compliance with the environmental requirements of the project in order to cooperate with the company
- (b) their formal commitment to comply with the environmental conditions and to take preventive measures to avoid adverse environmental impacts
- (c) 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 it works with. Most of our key suppliers are certified according to one or more of the following systems, depending on their field:

ISO 9001:2008
ISO 14001:2004
ISO 22000:2005
EN 361:2002
EN 358:1999
EN 3834-2
OHSAS 18001:2007
CE - EN 12899-1:2007

Nea Odos suppliers include:

- The construction consortium
- Engineering companies
- Suppliers exclusively working on the construction works of Nea Odos
- Subcontractors for the maintenance of civil engineering works, snow–clearing and equipment maintenance
- Suppliers for consumables
- External collaborators providing support for operating issues (attorneys, certified auditors, etc.)

Supplier Assessment

Nea Odos carries out regular and thorough inspections regarding compliance with the environmental legislation of its suppliers related to infrastructure operation and maintenance. Suppliers and subcontractors are evaluated annually on the basis of specific criteria which include:

- Meeting deadlines
- Quality
- Responsiveness
- Product/services availability
- Product/services compliance with the predefined by the company requirements
- Compliance with safety and health regulations
- Cost
- After–sales support

Nea Odos has identified a total of 196 important vendors with whom it collaborates and interacts. The results of the annual evaluation for 2018 showed an average annual assessment average of 4.1.

The company did not carry out environmental audits of new suppliers in the reference year of this Report, nor did it observe any significant adverse environmental performance of its suppliers. In 2018, no incidents were recorded by our suppliers that led us to terminate any cooperation.

Advancing the Role of the Procurement Department

In 2018, Nea Odos continued to invest in its relationships with its suppliers and in the optimal management of its supply chain. Specifically:

- A new member joined the procurement team, enhancing the efficiency and quality of the department.
- Meetings with major suppliers were established so that any problems arising during the ordering process be systematically resolved.
- Progressively, all provisions and tenders are undertaken by the procurement department so that there is coordination from a unified Centre on issues concerning provisions, thus augmenting the efficiency of the company's purchases.
- Organizing tenders for supplies of materials that can be grouped (e.g. vehicle tires) to achieve a profitable and speedy
 purchase with a centralized agreement.
- Meetings with critical suppliers are ongoing to better communicate, prevent problems, or resolve issues that may occur.

Local Suppliers

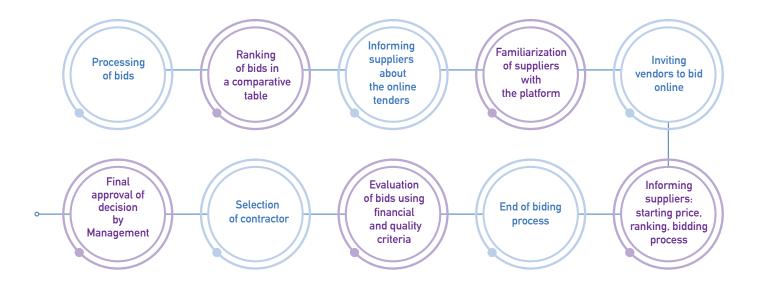
Strengthening support to the local and national suppliers is a commitment for Nea Odos. We are bound to making a significant contribution to the development of the local communities affected by our motorways and are committed to supporting small suppliers.

Suppliers by Category / Origin

| Suppliers Categories | 2018 | | 2017 | | 2016 | | 2015 | |
|----------------------|------------------------|----------------|------------------------|-------------------|------------------------|-------------------|------------------------|----------------|
| | Number of
Suppliers | Investment (€) | Number of
Suppliers | Investment
(€) | Number of
Suppliers | Investment
(€) | Number of
Suppliers | Investment (€) |
| Local | 431 | 1,531,551.76 | 470 | 3,806,213.48 | 301 | 2,184,664 | 236 | 2,085,539 |
| National* | 263 | 111,450,848.38 | 341 | 275,098,329.04 | 202 | 450,987,325.30 | 211 | 280,931,984 |
| International | 32 | 743,048.3 | 32 | 1,900,846.91 | 37 | 986,703.49 | 18 | 2,235,606 |
| Total | 726 | 113,725,448.44 | 843 | 280,805,389.43 | 540 | 454,158,692.79 | 465 | 285,253,129 |
| | | | | | | | | |

^{*}National suppliers include transactions with related parties, amounting to €49,682,381.60. This total also includes the support to the Central Greece motorway amounting €35,954,444.00 however, the transaction is conducted through the Greek State and Nea Odos and therefore it is not included in the transactions between the related parties.

Online Tenders



GRI 102-9, GRI 103-2, GRI 103-3, GRI 413-2

In some cases of supply tenders Nea Odos proceeds with online tenders through its dedicated online platform. The platform allows prospective suppliers to bid online within a set timeframe and have the opportunity to submit multiple interim bids.

At the end of the biding, the offers are evaluated on the basis

of economic and quality criteria and the appropriate tenderer is selected.

In 2018, five tenders were held through this platform, with significant benefits for Nea Odos

| Connection to | • | 2018 | 3 | 2019 |
|--|---------------------------------|---|---|---|
| the Sustainable
Development Goals | Topic | Goal | Progress | Goal |
| 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE | Customer Satisfaction
Survey | Retention of customer service ranking results | New survey con-
ducted across all our
motorways | Run a mystery
survey for the
assessment and
improvement of our
services |
| 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE | Customer Care Call
Centres | Customer service (phone):
90% of issues handled
within 2 minutes of call
receipt | Maintain 90% | Conduct a new
survey for all
our motorways |
| 9. INDUSTRY, INNOVATION AND INFRASTRUCTURE | Driver services upgrade | Install POS in all toll stations | Completed | |
| 17. PARTNERSHIPS
FOR THE GOALS | Electronic tender plat-
form | Platform completed and fully operational | Completed | Utilise platform
for tenders |
| | | | | |







Primary Sustainable Development Goals



8. DECENT WORK AND ECONOMIC GROWTH

Secondary Sustainable Development Goals











16. PEACE, JUSTICE

INSTITUTIONS

During 2018, Nea Odos:

organized training courses and 280 people were trained

provided **2,557 hours** of Health & Safety training trained 42 people through the Development

employees from outside Attica prefecture reached 68%

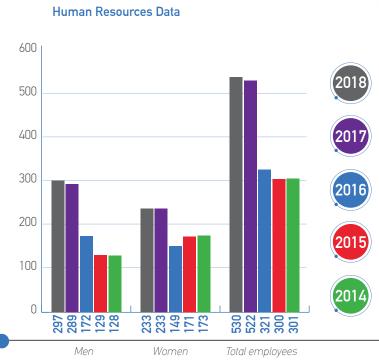
6.1 Our People

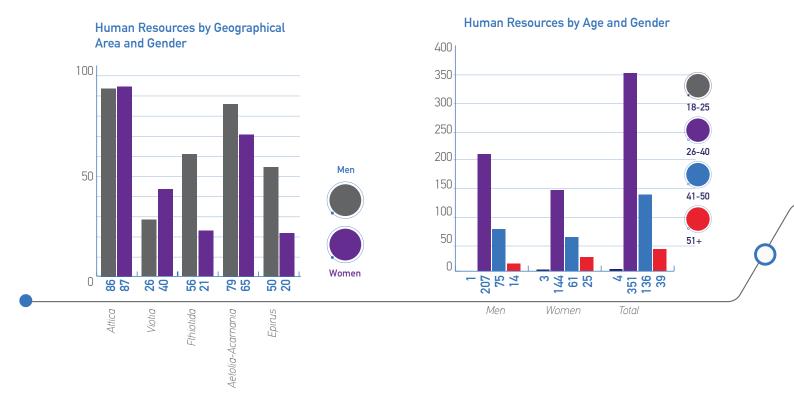
Our employees are the driving force of the company. That is why at Nea Odos we actively support our people and offer to all employees, without exception, opportunities for constant development in a working environment which is safe and fair. Through policies and procedures, we also care for enhancing their talents and developing their skills.

In 2018, 530 people were employed in the company; 297 were men and 233 women (1 man and 3 women belong to national or other minorities).

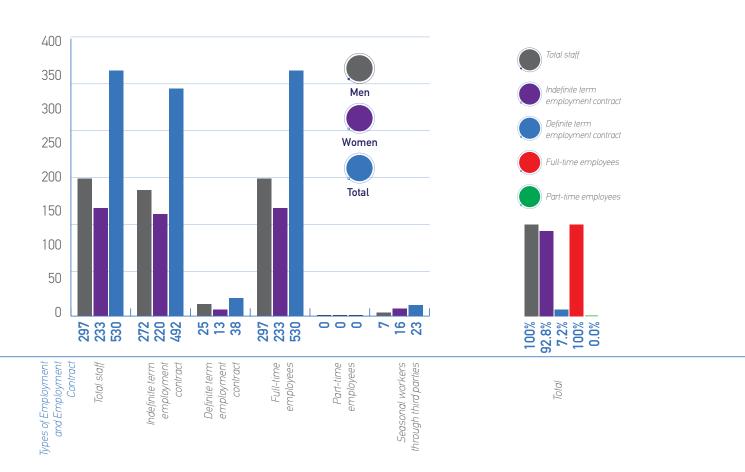








Human Resources by type of Employment and Employment Contract



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.

New Employee Hires by Age and Geographical Area

Employee Turnover by Age and Geographical Area

| | 18-25 | 26-40 | 41-50 | 51+ | Total | | 18-25 | 26-40 | 41-50 | 51+ | Total |
|-------------------|-------|-------|-------|-----|-------|-------------------|-------|-------|-------|-----|-------|
| Attica | - | 21 | 6 | - | 27 | Attica | - | 19 | 4 | 4 | 27 |
| Viotia | - | 4 | - | - | 4 | Viotia | - | 3 | - | 2 | 5 |
| Fthiotida | - | 9 | - | 1 | 10 | Fthiotida | - | 2 | - | 4 | 6 |
| Aetolia-Acarnania | - | 10 | 2 | 1 | 13 | Aetolia-Acarnania | - | 4 | 1 | - | 5 |
| Epirus | - | 3 | 2 | - | 5 | Epirus | - | 3 | 2 | - | 5 |
| Total | - | 47 | 10 | 2 | 59 | Total | - | 31 | 7 | 10 | 48 |

incoming (Total number of incoming/ total employees))

0.11%

Outgoing (Total number of outgoing / total employees)

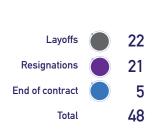
0.09%

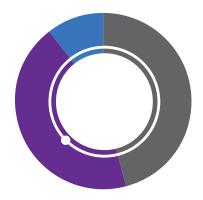
New Employee Hires by Gender and Age

Employee Turnover by Gender and Age

| | , | | | | | | |
|------------------------|-----|----------------------|---|----------|---|--------|----|
| | , , | 36 Men
23 Women | - | 19
12 | 3 | 5
5 | 27 |
| Women - 17 Total - 47 | 10 | 23 Women
59 Total | | 31 | 7 | 10 | 48 |

Turnover Analysis







6.2 Equal Opportunities

The principle of equal opportunities is at the core of our corporate culture, ethics and philosophy. Protecting the rights of our employees is a non-negotiable priority for creating a healthy work environment in which there is absolutely no discrimination in terms of race, colour, gender, language, religion, politics or any other beliefs, national or social origin, property, or any other situation.

Recruitment and performance evaluations are based on merit criteria and on our corporate policies. No discrimination is observed in employee pay related to gender or other characteristics of diversity. All employees receive equal pay for work of equal value.

In order to continuously improve the working environment and develop innovative practices, the Human Resources Department has adopted an Open Door policy, which allows all employees to propose and discuss informally about corporate issues with representatives of the administration, directors, supervisors, etc.

In 2018, there were no incidents of discrimination in the workplace, and no reporting or complaints were 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% | 0.0% |
| Managers | 4 | 5 | 9 | 44.4% | 55.6% |
| Administrative staff | 70 | 57 | 127 | 55.1% | 44.9% |
| Labour staff | 219 | 171 | 390 | 56.2% | 43.8% |
| Total | 297 | 233 | 530 | 56.0% | 44.0% |

6.3 Benefits

The company seeks to provide a work environment that promotes personal and professional development, supports quality of life and promotes work/life balance.

Nea Odos acknowledges the contribution of employees to the realization of its work and ensures that it provides benefits that go beyond the provisions of collective labour agreements and the current legislation. In particular, it provides a group life insurance scheme and health care for all employees, while depending on the job position, the company provides:

- Vouchers (€35,930.86)
- Productivity Bonuses (€8,605)
- Mobile phones
- Company cars

The company the employee social contributions, as required by law, but there is no additional pension plan. Employees who retire receive a pension from the competent state institution.

In 2018, 23 women applied for and were granted maternity leaves, of which 11 returned to their duties and the remaining 12 are expected to return in 2019.

6.4 Talent Development

Employee Performance Evaluation Process

The annual employee performance evaluation process contributes, on the one hand, to the creation of a high-level corporate performance culture, and, on the other, creates a common understanding of corporate goals and how to achieve them. The evaluation process allows employees to create an individual development plan that is in line with the corporate values of Nea Odos. It focuses on employees' prospects and the support they need to achieve their goals and to evolve personally and professionally, while it binds supervisors and employees to make joint decisions on steps to be followed.

At the end of 2018, Nea Odos carried out the evaluation process for 2017, in two phases. The first phase included maintenance, operation and traffic management staff and the second phase included the administrative staff. Out of 530 employees, 484 (Men: 268, Women: 216) [91%] were evaluated. The process was carried out according to the formal procedure for all eligible employees and all employees received feedback.

Development Centre and Talent Management

In 2015, 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.

Participants may come from all management levels and from all departments of the company. Our primary objective is to identify talent at all levels of the organization and in all geographical areas. In addition, our objective includes strengthening the environment of continuous learning, high commitment and performance with emphasis on growth, feedback and transparency, with respect towards employees.

The results from the implementation of the Development Centres: All heads of business units agree that Development Centres contributed to:

- talent recognition and the creation of a growth culture at an 87% rate
- the improvement of their team bonding at a 73% rate

The Development Centres methodology assisted in launching new training programs that have now been integrated into the Human Resources training curriculum, and focus on the role of the supervisor, the challenges, the team dynamics and the empowerment of employees.

They also contributed to changing the hierarchical structure of the company. The promotion and staffing of new motorways were planned through the Development Centres. Specifically, a new hierarchical level emerged, that of the "Team Leaders", where mainly employees in the rank of Directors (Head of Departments) are included.

Development Centres Entries

| Geographical Area
(Workplace) | Men | Women |
|-------------------------------------|-----|-------|
| Prefecture of Attica | 3 | - |
| Prefecture of Aetolia-
Acarnania | 17 | 8 |
| Prefecture of Ioannina | 8 | 3 |
| Prefecture of Fthiotida | 3 | - |
| Total | 31 | 11 |

Distribution of Development Centres Entries

| Men | Womer |
|-----|-------------------|
| - | - |
| - | - |
| 23 | 8 |
| 8 | 3 |
| 31 | 11 |
| | -
-
23
8 |

Investing in Knowledge

Nea Odos follows a corporate training process, applicable to all employees and at all levels, aiming at supporting its corporate strategy through the training and professional development of its employees.

In 2018, a total of 26 trainings (inhouse and outside the company) took place in which a total of 280 people participated.

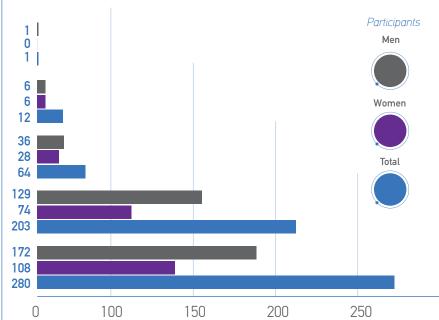
Employee Training and Skills Development



Total

Labour staff

Category / Ranks



| Training Hours by
Human Resources | Ti | Training Hours | | Average Training Hours | | Hours |
|--------------------------------------|---------|----------------|---------|------------------------|-------|-------|
| Category | Men | Women | Total | Men | Women | Total |
| Top Executives | 18 | - | 18 | 4.50 | - | 4.50 |
| Managers | 238.5 | 270.5 | 509 | 59.63 | 54.10 | 56.56 |
| Administrative staff | 805.5 | 742 | 1,547.5 | 11.51 | 13.02 | 12.19 |
| Labour staff | 1,480.5 | 430 | 1,910.5 | 6.76 | 2.51 | 4.90 |
| Total | 2,542.5 | 1,442.5 | 3,985 | 8.56 | 6.19 | 7.52 |

Number of Programs Financed by the Company

2018

Postgraduate Programs

1

Foreign Language Programs

1

| Training Hours by Topic | Training Hours | Number of
Trainings |
|--|----------------|------------------------|
| Health and Safety | 2,557 | 9 |
| IT / PC Operation / Systems | 270 | 2 |
| Human Resources Management
& Leadership | 517 | 5 |
| Financial - Accounting | 323 | 3 |
| Corporate Social Responsibility -
Standards | 80 | 1 |
| Technical Issues | 43 | 2 |
| Customer Service | 84 | 1 |
| Legal | 16 | 1 |
| Corporate Communication & Marketing | 32 | 1 |
| Other | 64 | 1 |
| Total | 3,985 | 26 |

Official briefings/trainings of employees on human rights issues have not yet been included in the provisional educational themes, as well as topics related to the fight against corruption and corporate governance.



6.5 Caring for Health and Safety

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

The company was certified in 2013 with 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. Under the

OHSAS 18001: 2007 framework, Nea Odos sets priorities and implements programs to implement its policies and achieve its Health and Safety goals.

In 2018, the company launched a general review and modification of the reporting and investigation process as regards accidents at work (8 accidents). The ultimate aim of this review is to identify the causes that led to accidents and to take measures to prevent such future occurrences. In particular, in the future, the immediate actions of each employee involved in an accident at

In addition, Nea Odos provides:

- 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
- In the framework of protecting the employees of the motorway maintenance department, the company provides Tetanus, Hepatitis A'and B' vaccinations
- Group Health and Medical Care Program supporting employees and their dependents.

Health and Safety Indices

| Indices Injury or accident rate of total staff (%) | 2018 1.51% | 2017 3.07% | 2016 3.43% | 2015 3.67% |
|--|-------------------|-------------------|-------------------|-------------------|
| Hours of absence / total work hours (%) | 0.07% | 0.14% | 0.14% | 0.42% |
| Accident frequency indicator | 8.20 | 19.58 | 19.40 | 20.13 |
| Accident severity indicator | 108.63 | 216.56 | 215.13 | 636.94 |
| Number of fatal accidents | 0 | 0 | 0 | 0 |
| Lost work days due to accident | 106 | 177 | 122 | 348 |
| Incidents without days of absence | 0 | 6 | 3 | 4 |
| Injury Rate (IR) | 1.64 | 3.92 | 3.88 | 4.03 |
| Lost Day Rate (LDR) | 21.73 | 43.31 | 43.03 | 849.68 |
| Absence rate (AR) | 144.91 | 288.88 | 286.99 | 127.39 |
| Total work accidents | 8 | 16 | 11 | 13 |
| Work accidents with days of absence from work | 8 | 10 | 8 | 9 |

Through their supervisors, employees are officially represented in the Health and Safety Committee with a percentage that exceeds 75%. The team leaders inform the top executives on Health and Safety issues, while keeping their subordinates informed of the management's decisions.

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
- Planed 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



Indicatively and not restrictively, the following Health and Safety programs have taken place:

- Measurements of working noise and harmful chemical substances in facilities
- Building evacuation drills
- Revision of the Written Occupational Risk Assessment of facilities
- Regular Health and Safety inspections at project facilities as well as on motorway works
- Health and Safety information material was given to employees
- First aid and fire safety trainings

Training on Occupational Health and Safety

| Торіс | Training hours | Entries | Training hours/
employee |
|--|----------------|---------|-----------------------------|
| First Aid Principles - Seminar for Top Executives, Managers & Heads of Departments | 112 | 14 | 8 |
| Working Safely at Height | 80 | 20 | 4 |
| Working Safely at Height (Tunnels) | 64 | 8 | 8 |
| Emergency Incidents and Tunnel Management (Frejus France) | 624 | 39 | 16 |
| Tunnel and Motorway Operations and Safety | 96 | 4 | 24 |
| First Aid Principles & Health & Safety Instructions (Labour Staff & | 112 | 14 | 8 |
| Team Leaders) 1 & 2 | 720 | 45 | 16 |
| ELOT Standard HD 384 - electrical installations standard requirements | 32 | 2 | 16 |
| Driving Behaviour & Safety | 697 | 199 | 3,5 |
| Evacuation of Buildings and Use of Fire Extinguishing Equipment | 20 | 10 | 2 |
| Total | 2,557 | 355 | - |

| Health and Safety Investment Categories | 2018 (€) |
|--|------------|
| Maintenance of the company building's fire safety system | 873 |
| Certifications (OHSAS 18001:2007, ISO 39001:2012) | 5,300 |
| Health and Safety Monitoring Program through internal inspections | 9,117 |
| Program for Occupational Noise and Harmful Chemical Agents Measurement in a 24hour basis | 5,600 |
| Employees medical insurance | 222,389.33 |
| Occupational Physician/Safety Technician | 13,760.90 |
| Pharmacy expenses / medical supplies | 10,979.88 |
| Total | 268,020.11 |

| Connection to | | 2018 | 2019 | |
|--|--|--|---|--|
| the Sustainable
Development Goals | Topic | Goal | Progress | Goal |
| 4. QUALITY
EDUCATION | Employee training | Total training hours/ total
employees>5 | Achieved. Total training
hours/ total
employees: 7.5 | Total training
hours/ total
employees>5 |
| 8. DECENT WORK AND ECONOMIC GROWTH | Integrate Corporate
Responsibility
questions in the
employee's survey | Conduct the employee survey which takes place every 18months. | Due to internal structural
changes the next survey is
scheduled
for the first half of 2019 | The next survey is scheduled for the first half of 2019 |
| 5. GENDER 8. DECENT WORK AND ECONOMIC GROWTH 10. REDUCED 16. PEACE, JUSTICE AND STRONG INSTITUTIONS | Development centres | 49 employees to take part in the
Development centres process | 5 people assumed a new
role in the company
42 people participated in the
Development centres | Further support
and development
of the employees
participating in
the development
centres |
| 3. GOOD HEALTH AND 4. QUALITY EDUCATION | Training on
Road Safety | Train 210 employees on Road
Safety | 200 employees trained Road
Safety by "Panos Mylonas"
Road Safety Institute | The goal is achieved and training for new employees will be conducted if required for new employees |
| 3. GOOD HEALTH AND 4. QUALITY EDUCATION | Training on stray animal management | According to the training plan,
the next training on stray animal
management is scheduled for
2018/2019 | Goal remains for 2019 for
22 employees of ATHE
motorway | Training on
stray animal
management for
22 employees |
| | | First Aid Training and Health &
Safety Policy and Procedures for
new employees: Goal is to train 77
employees | 59 people trained | The goal was partially achieved in 2018 and will be attained during 2018 by training 18 employees |
| 3. GOOD HEALTH AND 4. QUALITY EDUCATION | Training on
Health & Safety | Training on Working Safely at
Height for new employees: Goal is
to train 28 employees | Achieved | Goal to train
new employees
hired after the
2018 training
completion or in
2019 |
| | | Conduct at least 150 training hours
on Health & Safety for middle and
high-ranking employees | Conducted 400 of training | Training will be conducted for new employees in 2019, if required |
| 3. GOOD HEALTH AND WELL-BEING | Annual Recertification | Annual Recertification:
OHSAS 18001:2007 | Completed | Annual
Recertification |
| 4. QUALITY EDUCATION 16. PEACE JUSTICE AND STRONG INSTITUTIONS | Employee training on
Corporate responsibility
and Sustainability | Active involvement of employees in material topics update | All departments/ functions participated in the process | |





Primary Sustainable Development Goals







13. CLIMATE ACTION

Secondary Sustainable Development Goals









3. GOOD HEALTH AND 6. CLEAN WATER AND 7. AFFORDABLE AND

11. SUSTAINABLE CITIES AND COMMUNITIES





15. LIFE ON LAND

17. PARTNERSHIPS FOR THE GOALS

In 2018. Nea Odos

invested over €970,000 in environmental protection projects conducted 126 noise measurements

initiated extensive restructuring of the recycling program

Nea Odos examines in depth all the possible environmental impacts and develops all possible scenarios to mitigate and effectively address any adverse impacts it may identify. Environmental sustainability has been a key objective since the project design phase. Nea Odos recognises the extent of its impact on the natural environment and takes care to reduce its environmental impacts and halt climate change by implementing a comprehensive strategy designed to achieve harmonization of the motorway with the environment. At the same time, the effects of climate change and the severity of weather events affect the operation of the road network. There is a growing need for invasive maintenance and infrastructure inspections, congestion management, while the company is burdened by the temporary suspension of toll stations and the collection of toll charges.

In the first half of the year, a diesel tanker overturned on Ionia Odos in the Arta region. There were no injuries from the traffic accident, but a major fuel leak on the road occurred. Nea Odos took the following, immediate actions in order to reduce the environmental impact of the incident:

On-site environmental inspection and laboratory testing by expert scientists

Leaked diesel collection using absorbent materials and working with a qualified partner

Restoration of slopes with clean plant material

Appropriate disposal of contaminated materials by a qualified partner

Relevant briefing of the relevant Prefecture on all actions taken

A second autopsy and laboratory tests to confirm the absence of contaminant load in the wider area

In addition, the company has undertaken a comprehensive review of its environmental policy, associated procedures and supplementary forms to include additional environmental topics and impacts and to increase its readiness in the event of environmental accidents and to eliminate any impact. In particular, the emergency response process for environmental accidents has been revised and enhanced with emergency response mitigation measures, in cases of environmental pollution, that have been taken directly by employees or subcontractors, as well as remediation and decontamination instructions.

The company's environmental policy lays the foundation for continuous improvement of its environmental performance, with emphasis on:

- 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 policy, we implement an Environmental Management System which has been certified since 2015 according to the ISO 14001: 2015 international standard. The system provides:

- Compliance with environmental legislation
- Schedule of monthly inspections as regards environmental terms
- Monitoring environmental objectives
- Extensive recycling program
- Analysis of environmental parameters and impacts
- Material and waste management program

Nea Odos carries out audits on the main Operating and Maintenance subcontractors as part of the regular environmental inspections and also monitors their environmental certifications. The above inspections mainly concern compliance with the environmental terms of the project, such as waste management and facility cleanliness managed by subcontractors (Snow Clearance Stations). The inspections include visual material (photographs) as well as sample checking of receipts, invoices and transport documents. In 2018, no significant negative environmental performance was recorded.



7.2 Impact from our Operations

Upon the completion of Ionia Odos in 2018, the company decided to have a more comprehensive presentation of its environmental impact by recording the consumption of each motorway separately.

Possible lack of data or significant variations in consumption are due to the limited number of measurements for Ionia Odos.

Energy Consumption

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

| Energy Consumption (KWh) | 20 | 018 | 2017 | 2016 |
|---|---------|------------|-------------------|-------------------|
| Lifer gy Consumption (KWII) | A.Th.E. | IONIA ODOS | Total
NEA ODOS | Total
NEA ODOS |
| Electric energy for road lighting and buildings | 33,04 | 3,904.61 | 27,075,683 | 22,166,345 |
| Solar energy (for ERTs and irrigation) | 19,224 | 11,813 | 31,037 | 19,224 |

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.

| | 20 | 018 | 2017 | 2016 |
|--|---------------------|-------------------|--------------------------------|--------------------------------|
| Fuel Consumption (Litres) Nea Odos | A.Th.E. | IONIA ODOS | Total
NEA ODOS
(A.Th.E.) | Total
NEA ODOS
(A.Th.E.) |
| Gasoline | - | - | 5,743 | 2,687 |
| Diesel (Fleet) Diesel (Generators) | 637,
11,280.65 | 684.26
5,000 | 525,932 | 369,490 |
| LPG | - | - | - | 85 |
| | 20 |)18 | 2017 | 2016 |
| Fuel Consumption (Litres) Subcontractors | A.Th.E. | IONIA ODOS | Total
NEA ODOS | Total
NEA ODOS |
| Gasoline | 15,294.03 | 12,080.72 | 27,783 | 96,340 |
| Diesel (Fleet)
Diesel (Generators) | 353,041.64
2,879 | 276,067.66
440 | 593,010
1,880 | 291,003
1,380 |
| LPG | 78.320 | 37.200 | 111.000 | 16.870 |

The quantities reported for Nea Odos Diesel (Generators) refer to fuel quantities renewed on an annual basis. The fuel that is not used within the year is pumped out and recycled by a certified contractor. Therefore, the quantities reported here do not accurately reflect actual consumption, as it is not possible to accurately record the annual quantity of fuel that has been consumed. The generators are used in case of power outage.

Raw Materials and Equipment

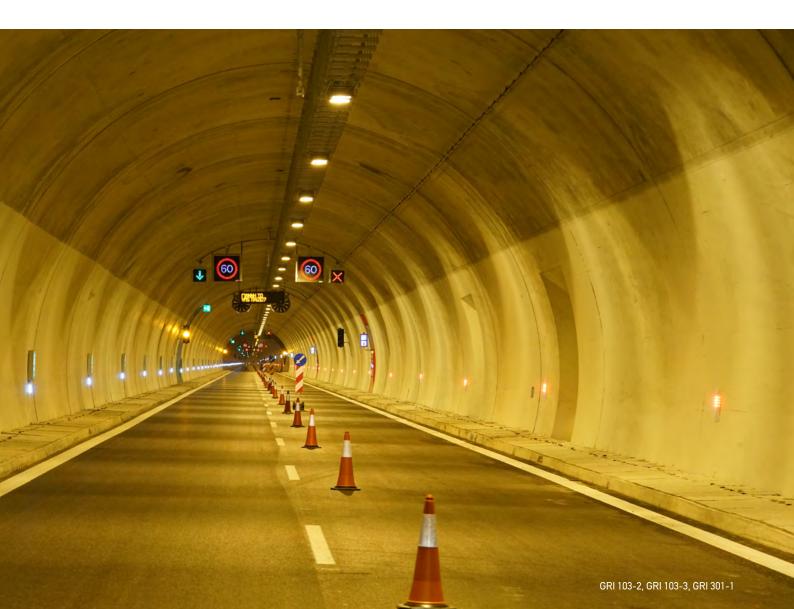
To ensure the efficient management of raw materials and equipment as well as for the preservation, protection and saving of natural resources, Nea Odos strictly adheres to the Authorised Environmental Terms of the Concession Project.

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

Use of Raw Materials and Supplies

| | | 20 | 018 | 2017 | 2016 | |
|--|----------------------------------|-----------|------------|--------------------------------|--------------------------------|----------------|
| Categories of raw materials and supplies | Material | A.Th.E. | IONIA ODOS | Total
NEA ODOS
(A.Th.E.) | Total
NEA ODOS
(A.Th.E.) | · Nea Odos |
| | Sawdust (Kg) | 3,400 | 900 | 4,350 | 4,400 | • 146a Ou05 |
| | Printing paper (Kg) | 8,5 | 70.03 | 10,875 | 4,642 | |
| Raw Materials | Paper (paper thermal rolls) (Kg) | 25,1 | 101.25 | 12,256 | 12,635 | |
| | Ink / Toners (pcs) | 1 | 135 | 126 | - | |
| Other | Transponders (pcs) | 21,500 | 10,000 | 31,250 | 15,500 (by 201 | 6) |
| | | | | | | Subcontractors |
| | Salt (Kg) | 2,310,070 | 1,406,870 | 4,988,238 | 5,572,350 | |
| Raw Materials | Sawdust (Kg) | 150 | 300 | 200 | 2,800 | |
| | Printing paper (Kg) | 430 | 15 | 290 | 242 | |
| | | | | | | |

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



Waste Management

Through the process of regular inspections, Nea Odos ensures compliance with environmental terms, regarding raw materials, equipment and waste management.

According to the legal framework in force, Nea Odos records waste data and uploads relevant supporting documentation at the Electronic Waste Register, the online service of the Ministry

of Environment and Energy.

The type and quantities of waste are presented in the tables below. It is worth noting that from 2018, there is a split between Ionia Odos and A.Th.E. and waste management was taken care of by sub-contractors for each motorway seperately.

Waste Management Table Nea Odos

| | | | | 2018 | | 2017 | 2016 |
|--|---------------------|--|-------------------|--------------|------------|--------------------------------|--------------------------------|
| | Categories of waste | Material | Total
NEA ODOS | A.Th.E. | IONIA ODOS | Total
NEA ODOS
(A.Th.E.) | Total
NEA ODOS
(A.Th.E.) |
| | Semi-manufactured | Lightbulbs (Kg)
Mixed batteries (Kg) | 10
17 | 10
17 | - | 167
7 | 1,150 (pcs)
- |
| | goods or parts | Batteries (Lead - Acid) (Kg) | 630 | 540 | 90 | 1,510 | 840 |
| | | Spare parts (cables) (Kg) | - | - | - | 242 | 800 (metres) |
| | | Computers / Electrical appliances / Equipment (Kg) | 122 | 122 | - | 843 | 3,033 (pcs) |
| | | Tires (Kg) | 8,459 | 7,904 | 555 | 9,315 | 4,480 (ap-
proximately) |
| | Mixed waste | Engine gear box and lubrication oils (Lt) | 3,465 | 2,015 | 1,450 | 2,441 | 1,897 |
| | Packaging material | Paper (Kg) | 870 | 870 | - | - | - |
| | | Recyclable materials (Kg)
Plastics (Kg) | 2,080
100 | 2,080
100 | -
- | -
- | -
- |
| | Other | Ink / Toners (pcs) | 95 | 95 | - | - | - |
| | | Discarded chemicals (Kg) | 100 | 100 | - | - | - |
| | | Contaminated soil (Kg) (due to the tanker incident) | 37,770 | - | 37,770 | - | - |
| | | Contaminated absorbent materials (Kg) (due to the tanker incident) | 1,588 | - | 1,588 | - | - |
| | | | | | | | |

The company's subcontractors collect any waste generated during the operation and maintenance of the motorway and transfer it to appropriately authorised locations or specific waste collection points provided by the official alternative waste management systems.



Waste Management Table Subcontractors

2018

| | | | 2010 | | 2017 | 2010 |
|----------------------------------|---|-------------------|----------|------------|--------------------------------|--------------------------------|
| Categories of waste | Material | Total
NEA ODOS | A.Th.E. | IONIA ODOS | Total
NEA ODOS
(A.Th.E.) | Total
NEA ODOS
(A.Th.E.) |
| Raw materials | Iron and steel (barriers, signs)
(Kg) | 54,150 | 32,000 | 22,150 | 74,740 | 72,320 |
| | Plastic (barriers, signs) (Kg) | 260 | 260 | - | 140 | 1,270 |
| Semi-manufactured goods or parts | Lightbulbs (Kg) | 775 | 775 | - | - | - |
| | Batteries (Lead -Acid) (Kg) | - | - | - | 960 | - |
| | Tires (Kg) | - | - | - | 6,600 | - |
| Mixed waste | Engine gear box and lubrication oils (Lt) | 4,349.25 | 2,949.25 | 1,400 | 3,934 | 2,517 |
| | Animal tissue waste (Roadkill)
(Kg) | 5,030 | 1,730 | 3,300 | 940 | 1,732 |
| | Mixed municipal waste (Kg) | 426,816 | 255,276 | 171,540 | 278,879 | 22,420 |
| Other | Cuts residues (Kg) | 62,600 | 62,600 | - | 65,000 | 79,000 |

Nea Odos does not import, export or process waste that is deemed hazardous. Regarding the management of water discharges, Nea Odos fully complies with the decisions of the Ioannina Region on municipal, non-hazardous, liquid wastewater and potential wastewater discharges in water bodies (this involves the "Ammotopos -- Kampis Springs" stream of constant flow, also known as "Rema Mana". This stream flows into the Vossa Trench 1 groove, which ends at the Vossa Trench 1. The water recipient is not a habitat of high biodiversity value and is not governed by any protection

program). 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 through parameters determined by the environmental regulations and conditions under which the environmental permits of these facilities have been obtained. In particular, as already mentioned, treated wastewater resulting from biological treatment is used for irrigation, cleaning of the surrounding area and firefighting.

2017

2016

Recycling

Nea Odos implemented the Boosting Recycling Initiative in 2018, a project to redesign the corporate recycling system in order to develop and promote recycling (a) quantitatively, by achieving a higher percentage of diversion of materials from mixed waste; (b) qualitatively, by including new flows of recyclable materials and (c) geographically, by gradually covering the entire project.

More specifically, until the end of 2018, special recycling bins for a range of materials along the company's premises for a range of materials were put in place.

The results were immediately visible and in 2018 we recycled 2,135 kg of materials (compared to 1,526 kg in 2017). The full results of the reorganization of the recycling system will be visible next year as a full year will have elapsed since the new system has been implemented.

During 2019, there is a plan to expand the recycling system with the participation of drivers/users by placing bins for the recycling of plastic, glass, aluminium, tin-plate and paper at all parking spaces that have toilets along our motorways.

Water Consumption and Savings

Nea Odos has undertaken a series of actions aimed at optimal water management in the totality of its activities.

- To save water, state-of-the-art watering systems have been installed for greenery watering within the boundaries of the Concession project.
- The company also cooperates with an ISO 14001: 2004 certified subcontractor for the planting and maintenance of green areas on its premises and along the motorway.
- In all parking spaces of A.Th.E, taps with an automatic flow-stop system have been installed.
- In all areas of public toilets of the Motorist Service Stations of Ionia Odos, taps with automatic flow-stop system have been installed.
- At the Motorist Service Stations, it has been planned to reuse the treated wastewater from the Motorist Service Stations biological treatment units to meet the needs for irrigation, cleaning the surrounding areas and firefighting.

| | • | | Water Consumption
NEA ODOS (m³) | | | | | Water Consumption Subcontractors (m³) | | | | |
|---|--|---------|------------------------------------|--------------------------------|--------------------------------|--|---------|---------------------------------------|--------------------------------|--------------------------------|---|--|
| | | 20 | 18 | 2017 | 2016 | | 20 | 18 | 2017 | 2016 | | |
| • | | A.Th.E. | IONIA
ODOS | Total
NEA ODOS
(A.Th.E.) | Total
NEA ODOS
(A.Th.E.) | | A.Th.E. | IONIA
ODOS | Total
NEA ODOS
(A.Th.E.) | Total
NEA ODOS
(A.Th.E.) | | |
| | Water Consumption
(Buildings & Facilities –
EYDAP) | 1,961 | - | 2,987 | 2,523 | | - | - | - | 0.3 | 9 | |
| | Drinking water (bottles) | 63.26 | 17.67 | 79 | 50 | | 6.10 | - | 1 | 10 | | |
| | Water from other sources (from drilling) | - | 290,000 | 131,633* | 580 | | - | - | - | 100,000 | | |

^{*} this is a review of the amount. The 131,633 amount represents the amount consumed since the start of Ionia Odos operation in September 2017 and includes consumption for the operation and construction of the motorway.

Managing Air Pollution

Nea Odos aims to effectively manage air pollution and mitigate its negative impacts. Measurements at air pollution measuring stations 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 Episcopikos. The station installation work began in June 2018 and commenced being fully operational (after the trial period) in August 2018.

According to the measuring station data recorded in 2018, there has been no atmospheric pollution above the permitted limits and, henceforth, measures to decrease pollution have not been taken.

Average Annual 2018

| Air Pollutior | | A.Th.E | | IONIA ODOS | | | |
|---|-------------|------------|---------|------------|-----------|------------|---|
| Measureme | † | Schimatari | Arkitsa | Evinochori | Filipiada | Episkopiko | Limits |
| NO ₂ | 38.35 | 18.7 | 26.39 | 3.74 | 13.31 | 5.21 | 40 µg / m³ |
| C ₆ H ₆ (benzene) | 0.51 | 0.65 | 0.2 | 0.18 | 0.14 | 0.31 | 5 μg / m³ |
| СО | 0.41 | 0.25 | 0.22 | 0.02 | 0.19 | 0.11 | There was no exceeding the maximum daily eight-
hour rate (10 mg / m3) at any station |
| SO ₂ | 5.1 | 2.83 | 3.07 | 0.97 | 1.55 | 1.37 | 125 μg / m3 average daily value should not be exceed-
ed more than 3 times per year |
| Particulate ma
PM2,5 | tters 9.59 | 10.61 | 9.54 | 7.13 | 10.62 | 4.42 | 25 μg / m³ |
| Particulate ma
PM10 | tters 16.96 | 16.37 | 14.49 | 10.00 | 15.28 | 6.27 | 40 μg / m³ |
| O ₃ | 22.3 | 45.03 | 41.10 | - | - | - | There was no exceedance of the maximum daily eight hourly rate (120 µg / m³) and no exceedance > 25 times per year at any station |

^{**} since Nea Odos is not yet officially in charge of the well drilling, which is under the manufacturer, the water consumption data is incomplete

At the A.Th.E. , the total amount of FREON used by air conditioners is 301.4 litters. We do not replace the FREON R410A & R22 types used in our installations with the R32 types, because they are not supported by the existing infrastructure.

However, in 2018 two new air conditioners were installed in the Schimatari Traffic Management Centre with a more environmentally friendly coolant (R32). Ionia Odos does not use ozone-depleting materials.

Greenhouse Gas Emissions (GHG)

Greenhouse gas emissions from our activities were calculated for the third consecutive time. Total emissions for the emissions categories 1 and 2 amounted to 21,825.1 tonnes of CO_2 equivalent.

Total CO, Emissions (tn)

| Emission sources | 2018 | 2017 | 2016 |
|--|----------|----------|---------|
| Direct emissions* from fuel consumption from own fleet (scope 1) | 1,701.3 | 1,406.1 | 984.8 |
| Indirect emissions** from electricity consumption (scope 2) | 20,123.7 | 18,430.7 | 7,659.3 |
| Total | 21,825.1 | 19,836.8 | 8,644.1 |

*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:

Heating oil: $0.002668 \text{ tCO}_2/\text{l}$, Diesel: $0.002668 \text{ tCO}_2/\text{l}$, Gasoline: $0.002429 \text{ tCO}_2/\text{l}$, LPG: $0.0015 \text{ tCO}_2/\text{l}$, Electricity: $0.609 \text{ tCO}_2/\text{MWh}$, Source: National Greenhouse Gas Inventory 2018 Intensity = $21,825.1 / 530 = 41.2 \text{ tCO}_2/\text{employee}$, Intensity = $21,825.1 / 368 = 59.38 \text{ tCO}_2/\text{motorway km}$

In order to reduce the environmental impact of employee and product transport (vehicle gas emissions), the company organizes eco-driving trainings, trains its drivers to comply with speed limits, and uses power fleet software through which it can control at any time the data of each vehicle (such

as when vehicle service was last performed). This ensures that all vehicle services are carried out in a timely manner and at certified garages, thereby reducing the environmental impact of any possible mechanical malfunction.

| Nea Odos Vehicles Mobility | Own | Leased |
|----------------------------|------|--------|
| Corporate vehicles | 55 | 65 |
| Kilometres covered | 7,09 | 5,584 |

| | | 2018 | |
|--|-------|-----------|------------|
| Corporate Fleet Mobility | Total | A.Th.E. | IONIA ODOS |
| Kilometres covered by the corporate fleet | | 7,095,584 | |
| Corporate fleet vehicles | 55 | 35 | 20 |
| Kilometres covered by patrol vehicles | | 3,835,633 | |
| Patrol vehicles | 28 | 19 | 9 |
| Kilometres covered by intervention teams' vehicles | | 422,339 | |
| Intervention teams' vehicles | 27 | 16 | 11 |
| | | | |

Addressing Road Traffic Noise

The areas adjacent to the motorway are exposed to various levels of Road Traffic Noise. A motorway operation can cause noise pollution and thus, Nea Odos runs an Annual Road Traffic

Noise Monitoring program that includes noise measurements on the motorway in noise sensitive areas that have been approved by the relevant state agency in charge.

In 2018 a total of 126 24-hour noise measurements took place:

52 noise measurements at the A.Th.E, at the Metamorfosi - Logos section

17 noise measurements at the A.Th.E, at the Loggos - Skarfia section

3 noise measurements at the A.Th.E. connector branch, at the Schimatari - Chalkida section

54 noise measurements at the IONIA ODOS motorway, at the Antirrion - Ioannina section

Permissible noise levels, as observed at Ionia Odos, were not exceeded, therefore no additional measures were required. Regarding A.Th.E. in the area of Kifissia, a Special Acoustic Study for the Assessment and Application of Noise Barriers has already been prepared and approved. Within 2018, actions have been taken to install a noise barrier, which has been scheduled to commence and be completed in 2019.

Caring for Biodiversity

The Concession project was based on Environmental Impact Assessments for the location and layout of the motorway, which recognized the natural wealth of the area. Nea Odos implements prevention measures to address impacts in sensitive areas in a timely manner, and the environmental terms in force constitute the framework for the protection and effective management of ecosystems and habitats. To date, no incident has been recorded with any adverse impact on these areas.

Ecologically sensitive areas of the A.Th.E. Motorway

- Yliki and Paralimni Lakes Voiotikos Kifisos System
- Wetland and islands of Atalanti Bay
- Spercheios valley and estuary

Ecologically sensitive areas of Ionia Odos Motorway

- Acheloos Delta, Mesolongi 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 River

Wetlands and rivers are part of the Natura 2000 network and are the areas that the motorways cross through or border with.

7.3 Investing in Environment Protection

Nevertheless, through actions, we seek to raise awareness among our employees and our partners on environmental protection and management issues.

| Environmental Protection Projects | Investment
(€) |
|---|-------------------|
| Environmental Studies
(MPE, TEPEM, Recycling Studies EPO, Environmental Licensing of Escorting projects and activities, etc) | 23,550 |
| Protection and maintenance of green spaces | 793,840 |
| Traffic Noise Monitoring Program | 16,000 |
| Environmental consultants and employees for monitoring the application of Environmental Terms | 28,550 |
| Equipment for air pollution monitoring | 18,891.21 |
| Operation of atmospheric pollution and meteorological data stations | 41,000 |
| Certifications (ISO 9001:2015 / ISO 14001:2015) | 4,000 |
| Waste management | 43,600 |
| Materials for restructuring the recycling program | 1,460 |
| Total | 970,891.21 |

7.4 Environmental Awareness Actions

The infrastructure we create with the construction of motorways is of vital significance and creates huge value. With the project completion, crucial traffic issues are solved and, important environmental benefits are acquired. However,

our role in raising the drivers' environmental awareness is certainly equally significant in a wider endeavour to change the prevailing mentality and promote an environmental consciousness.

Investment

- 1 Distribution of bio-degradable bags: For the fourth consecutive year, in cooperation with SKAI TV and SKAI radio station, we distributed 20,000 biodegradable bags during the peak season during Greek Easter. At the toll station of Afidnes, drivers were given special bags made from 100% recycled material for their litter during their trip.
- In the framework of internal actions to redesign the recycling system, printable recycling materials and waste management instructions were sent electronically to the recycling leaders of all company facilities so that they would be posted in public areas. In addition, the recycling leaders and employees of the Nea Erythrea Headoffice building received e-mails with recycling tips so as to recycle more accurately and efficiently.

| Connection to | | 2018 | | 2019 |
|--|--|---|---|--|
| the Sustainable
Development
Goals | Topic | Goal | Progress | Goal |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION 13. CLIMATE ACTION | Annual Recertification | Annual Recertification:
ISO 14001:2015 | Completed | Annual
Recertification |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Measurement of CO ₂ emissions (Offices) | Measurement of CO ₂ emissions (Offices) | Completed | Measurement of CO ₂ emissions (Offices) |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Operation and maintenance activities | Zero fines | Achieved | Zero fines |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Green Motorist
Service Stations | Design and construction
according to the
Regulation of Energy Efficiency
in Buildings, for Motorist Service
Stations (MSS) in Ionia Odos and
ATHE | Completed | |
| 12. RESPONSIBLE CONSUMPTION AND PRODUCTION | Recycling | Expansion of the recycling program to the new stations of lonia Odos | Completed | Extended restructuring of the recycling program |
| 15. LIFE ON LAND | Wildlife management | In 2017, Nea Odos started collaborating with public bodies related to wildlife management (Forest Services, Ministry of Rural Development and Food, etc.) as part of the motorway wildlife monitoring and management program. | The design of the program is ongoing, and its completion and implementation is expected in 2020 | Goal moved
to 2020 |
| | | | | |



Primary Sustainable Development Goals



Secondary Sustainable Development Goals







3. GOOD HEALTH AND WELL-BEING





In 2018.

almost 60% of our suppliers originate from the local communities around the motorway almost 68% of our employees reside outside the Attica prefecture
we trained 1,670 students on Road Safety

8.1 Our Contribution to Social Development

Contributing to social development, both locally and nationally, lies at the heart of our philosophy. We support the local communities that are adjacent to our motorways and we contribute to their economic growth by implementing long-term programs and targeted actions.

In 2018, we pursued successful national initiatives with strategic partners and supported a large number of social initiatives that bring value at the local level.

Annual contribution to Social Development - Social Product (in th. €)

| | 2018 | 2017 | 2016 | 2015 | 2014 |
|--|------------|-----------|-----------|-----------|-----------|
| Payments to suppliers
(except materials and intercompany
transactions) | 63,841.57 | 65,973.53 | 66,644.03 | 27,661.34 | 46,125.87 |
| Employee salaries and benefits (including insurance contributions) | 12,119.37 | 8,906.90 | 6,619.37 | 7,648.36 | 6,162.73 |
| Payments to providers of capital | 33,275.28 | 8,488.48 | 6,798.66 | 6,984.83 | 6,331.45 |
| In-kind support, financial support and donations (including investments in Corporate Social Responsibility Structures) | 564.73 | 467.82 | 272.56 | 259.71 | 229.52 |
| Total | 109,800.95 | 83,836.73 | 80,334.62 | 42,554.24 | 58,849.57 |

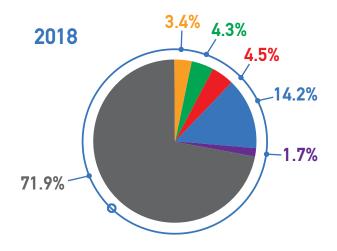
8.2 Our Key Priorities

Nea Odos's key priorities cover the following areas:

- Education and Awareness Activities
- Social Solidarity Activities
- In-kind donations
- Cultural Activities
- Sports Activities
- Stray Animals

In 2018, our total investment in our key priorities amounted to €564,731

In 2017 amounted to €467,777.7



Education and Awareness Activities Social Solidarity Activities Sports Activities Cultural Activities Stray Animals In-kind donations

Road Safety Training and Awareness Activities

In 2018, our total investment in training and awareness actions on road safety amounted to €19,218.

Interactive awareness and training actions:

- 1 The "Cycling Safely" program in collaboration with the "Panos Mylonas" Hellenic Road Safety Institute
- 2 The "Do It Right" experiential program in Boeotia in collaboration with the "Panos Mylonas" Hellenic Road Safety Institute

Briefing Material:

- Briefing material on road safety
- Video recording of our actions on road safety

We organize interactive awareness and training actions in collaboration with the "Panos Mylonas" Hellenic Road Safety Institute.

"Cycling Safely"

The "Cycling Safely" program addressed to school children contributes to shaping road driving culture and behaviour. The program aims to help children develop a responsible driving behaviour which will shape their mentality and behaviour as

adults. The program has been approved by the Ministry of Education and the Institute of Educational Policy, while it is always implemented with the cooperation of the competent Directorates of Primary Education.

From September 2018 to February 2019

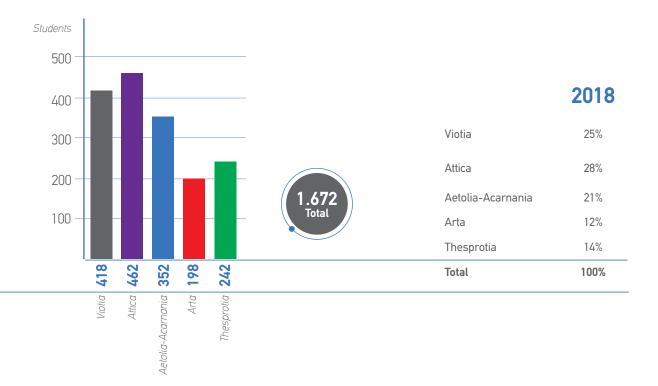








Students Participation by Prefecture



Attitudes and Behaviours During the Program

| | Use of | Bikes | | Hospitalization | | | | |
|-------------------|--------|-------|--------|-----------------|----------------|-------|--------------------------|----------------|
| Prefecture | Yes | No | Always | Usually | Some-
times | Never | I don't have
a helmet | from Bike Fall |
| Viotia | 97% | 3% | 27% | 10% | 13% | 13% | 37% | 10% |
| Attica | 97% | 3% | 21% | 17 % | 19% | 12% | 31% | 14% |
| Aetolia-Acarnania | 95% | 5% | 25% | 10% | 17 % | 11% | 37% | 19% |
| Arta | 98% | 2% | 22% | 9% | 15% | 15% | 39% | 14% |
| Thesprotia | 95% | 5% | 21% | 14% | 23% | 10% | 32% | 14% |
| Average | 96% | 4% | 23% | 12% | 17% | 12% | 35% | 14% |

Comments/statements of students who participated in the program:

«I liked the games because they gave us knowledge»

«I learned to move safely»

Teacher Assessment of the Training Program

Facilitators Assessment

| | Excellent | Very much | Fairly | Mod-
erate | | Excellent | Very much | Fairly |
|------------------------------------|-----------|-----------|--------|---------------|------------------------------|-----------|-----------|--------|
| Response to goals and expectations | 69% | 27% | 4% | 0% | Satisfactory answers | 85% | 13% | 2% |
| New knowledge /
skills acquired | 65% | 28% | 6% | 1% | Facilitator transmissibility | 86% | 11% | 3% |
| Allocation of training time | 64% | 28% | 7% | 1% | Knowledge of the subject | 89% | 9% | 2% |
| Quality and content of lectures | 72% | 24% | 4% | 0% | | | | |
| Practical part of the training | 63% | 29% | 7% | 1% | | | | |
| Use of equipment | 58% | 32% | 9% | 1% | | | | |
| Overall satisfaction | 69% | 27% | 4% | 0% | | | | |

Quotes from Teachers who participated in the program:

Acquiring new knowledge on safety and traffic while biking. The experiential intervention with the protection points and the parts of the bicycle was a very intelligent method for the consolidation of the theory from the children." (Teacher – Primary School of Neochori-Arta)

"Very good response from the children. Excellent interaction from the trainer. Rich visual material. Experiential approach. Directness, clarity and focus. Fast and fun." (Teacher - 1st Primary School of Drosia)

Our Collaboration with "ELIZA"

In 2018, Nea Odos supported the training of 265 police officers of all levels from the regions of Akarnania, Aitolia, Arta, Preveza, Ioannina Evia, Fthiotida, Viotia and Fokida, in identifying and managing incidents of child abuse. The action was carried out in cooperation with tthe ELIZA Society for the Prevention of Cruelty to Children, in the framework of a national initiative implemented in cooperation with the Hellenic Police Force. The ELIZA Society for the Prevention of Cruelty to Children, is

a specialized Non-Profit Organization established in Greece

in 2008 with the sole purpose of protecting and promoting the rights of children who have suffered or are at risk of being abused or neglected. It is the only organization in Greece that focuses on children of a preschool age. Police training is part of the "Pan-Hellenic Campaign Against the Abuse of Minors" that was launched by ELIZA in 2016.

Welfare and Social Solidarity Activities

Moreover, we support smaller social solidarity actions with a view to strengthening associations that care for vulnerable social groups. Our goal is to increase the quality of life of the residents in the areas bordering our motorways.

In 2018, we supported associations, institutions, charities, clubs and non-profit organizations catering for specific or fixed needs with financial donations, including:

Social Grocery Shops (in Thermo, Messolongi, and Skoufa)

Voluntary Firefighting Groups of Rodopi and Agios Stefanos

Voluntary Firefighting Groups of Rhodes for the purchase of a water wagon

Autism protection organization

The Agrinio Development Conference

The history Museum of Therma

The «PELOPONNESE» Newspaper

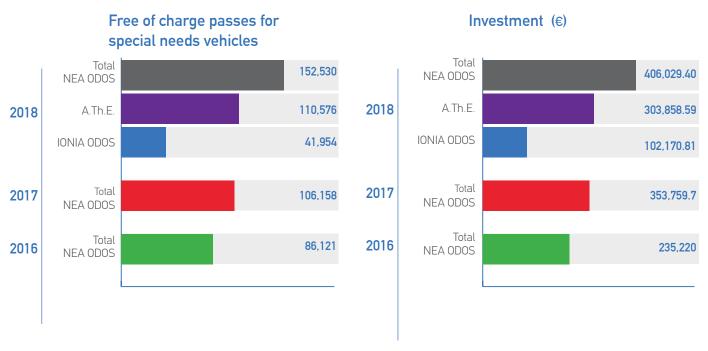
In addition to the above:

Anonymous donations: the amount of € 118.68 was donated by motorway drivers at points of service.

In-Kind Contributions

In 2018, Nea Odos continued to support people with special needs by offering toll free transits of special needs vehicles.

Evident Support for the people with disabilities



Nevertheless, we support organizations, groups and unions in need by granting them toll free transits passes. In 2018, we granted more than 1,400 toll free passes to:

- vehicles of the "Smile of the Child" organization
- vehicles of the trainers of the 1st Second Chance Prison School at Eleonas in Thebes
- vehicles of the Hellenic Rescue Team of Magnesia
- vehicles of the "Argonauts" Athletic Club of Disabled People
- members of the Association of Parents and Guardians of Disabled People in the Fthiotida prefecture

Cultural Activities

Strengthening cultural actions emerged as an important issue during our stakeholder consultations. Gradually, Nea Odos enhances its involvement in initiatives that highlight and protect the local cultural heritage, such as:

Our Collaboration with the "Diazoma" Association

The pioneering initiative at a European level, that is the "Cultural Route of Ancient Theatres of Epirus" program, has been developed by the "Diazoma" and is the largest development bet for the Prefecture of Epirus in recent decades. The development program aims at highlighting monuments in an innovative way, linking them with the lives of local communities, with entrepreneurship and employment. The strategic plan is based on the holistic enhancement of the cultural heritage of Epirus

and its use as a development tool that will generate demand for products and services, create new jobs and generate revenue.

4 regional sections, 5 archaeological sites (Dodoni, Nicopolis, Kassopi, Amvrakia and Gitanas), and 9 ancient theatres are included in this program. It runs through 344 km of the motorway route and 2,300 years of history.

The partnership with "Diazoma" supports our strategic goal of integrating motorways into the environment in a smooth manner and harnessing the development potential of local areas. In addition, Nea Odos supports the "Cultural Route of Ancient Theatres of Epirus" program with initiatives that include:

- 1 Creation of a digital panorama to highlight cultural and environmental points of interest
- 2 Creation and installation of an Interactive Digital Information Station (infokiosk) with a pilot application at the Sirios Motorist Service Station
- 3 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

Developing Cultural Audio Tours

In collaboration with Clio Muse, the award-winning smartphone thematic audio tours, we implemented an innovative for our industry initiative, with the creation of 15 cultural audio tours that reveal unknown aspects of new, dynamic destinations connected to the Ionia Odos and the A.Th.E. .

These are 11 walking trails and 4 road trips aiming to highlight, through an original narrative model, the most important monuments of the cities, highlighting their history, tradition and other lesser known aspects of their culture.

The destinations included in our itineraries are Nafpaktos, Messolongi, Agrinio, Amfilochia, Vonitsa, Astakos, Preveza, Arta, Philippiada, Ioannina and Dodoni. These are 154 important monuments presented through the 489 stories of the 15 cultural paths. The routes are available in English and Greek, and accessible online & offline through the Clio Muse ann

Additional indicative activities supported by Nea Odos:

- 1 The Summer Festival of the Municipality of Dodoni
- The Vovousa Municipality Music and Theatre Festival
- 3 The Exhibition of the Ioannina Silver Craft Museum (Piraeus Group Cultural Foundation)



8.3 Sports Activities

In the recent driver survey conducted by Nea Odos, it became clear that the motorway users would like us to support and fund sports programs in the areas the motorways run through. In this context, we supported actions that promote the social

role of sports, support local institutions and actively support young athletes in local communities.

Our investment in sports actions





In particular, at the local level, we supported the following sports associations:

- The cycling races of Nafpaktos and the Marathon of Nafpaktos
- The Molos Football Academy
- The Greek Paralympic Committee
- The Run Race of Kastro-Viotia
- Keravnos of Thesprotikos (a Women's Football Team)
- 6 Pick Patras (Car Racing)
- The Amazons (Women's Volleyball Team)
- The Akraifnia Run Race
- PAE Panetolikos (Football Team of the First League)
- 10 The Women's Football Club of Messolonghi



8.4 Taking Care of Stray Animals

Nea Odos cares for the safe, and smooth traffic flow and therefore has installed a fencing along the entire motorway, with special wire netting suitable for use on motorways for the protection of both animals and drivers.

In 2017, the company intensified its efforts to collect and manage stray animals. In collaboration with the Animal Welfare Society, Nea Odos provided vet care and tests that included

Kala-azar tests, Erhlichia and scabies treatments, anti-rabies vaccinations, orthopaedic surgeries/minor surgeries, x-rays, neutering, assessing/implanting tracking chips. Almost all animals were hosted during their recovery in a specially constructed area before they were transported or adopted.

In 2018, respectively the company treated and covered the medical expenses of 67 stray animals with the investment exceeding \in 9,490 and the average cost per animal amounting to \in 142. In addition, 7 of the 67 animals the Animal Welfare Society cared for have now been adopted and one was returned to its owner.

8.5 Corporate Social Responsibility Structures

Strengthening our internal structures and participating in international organizations and informational conferences are requirements for implementing our Corporate Social

Responsibility actions. Targeted communication actions are also included in this context. We invested €67,199 to this end in 2018.

| Investing in Strengthening Corporate Social Responsibility | | Investment
(€) |
|--|---------------------|-------------------|
| | Corporate Strategy | 16,900 |
| | Event participation | 33,649.35 |
| | Communication | 16,650 |
| | Total | 67,199.35 |

8.6 Ethics and Corporate Communications

As in all aspects of our business activities, as regards our corporate communications, we also follow standards and ethics that respect the principles and ethics of Nea Odos. The Greek Advertising/ Communications Code of the Communications Control Council regulates at a professional ethics level our corporate communications for commercial and

social purposes. The quality of our corporate communications reflects our business ethics which is a vital element for a socially responsible company.

| Connection to | 2018 | | | 2019 |
|---|---|--|--|---|
| the Sustainable
Development Goals | Topic | Goal | Progress | Goal |
| 3. GOOD HEALTH AND WELL-BEING | Blood bank | Repeat blood collection for
employees of the ATHE
motorway, including the new
motorway sections | Has not taken place
since the 2017 blood
collection took place
end of 2017. | Repeat blood
collection for
employees of the
ATHE |
| 3. GOOD HEALTH AND WELL-BEING 17. PARTNERSHIPS FOR THE GOALS | Stray animal
management | Maintain and strengthen collaboration with the Greek animal welfare company | Completed | Maintain
collaboration with
the Greek animal
welfare company |
| 1. NO POVERTY 3. GOOD HEALTH AND QUALITY WELL-BEING EDUCATION 17. PARTNERSHIPS FOR THE GOALS | Strengthening
partnerships | Support the social initiative: "Eliza" Support the Observatory of Road Networks in | Completed | Ongoing |
| 3. GOOD HEALTH ANDQUALITY 17. PARTNERSHIPS WELL-BEING EDUCATION FOR THE GOALS | E-Learning
platform
dedicated to
Road Safety | Suitable synergies to enrich
the educational content of the
platform | Completed | Content
development in
order to pilot in 2020 |
| 17. PARTNERSHIPS
FOR THE GOALS | "Kilometres of
Solidarity" | Expand the number of supported bodies | Ongoing | Expand the number of supported bodies |



9

SUSTAINABLE DEVELOPMENT GOALS IN OUR OPERATION

Road Safety

Primary Sustainable Development Goals



3. GOOD HEALTH AND WELL-BEING



9. INDUSTRY, INNOVATION AND INFRASTRUCTURE



11. SUSTAINABLE CITIES

- 3.6 By 2020, halve the number of global deaths and injuries from road traffic accidents.
- 3.6.1 Death rate due to road traffic injuries.
- 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.
- 9.1.1 Proportion of the rural population who live within 2 km of an all-season road.
- 9.1.2 Passenger and freight volumes, by mode of transport.
- 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.
- 11.2.1 Proportion of population that has convenient access to public transport, by sex, age and persons with disabilities.

Secondary Sustainable Development Goals



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

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.

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.

- 9.1.1 Proportion of the rural population who live within 2 km of an all-season road.
- 9.1.2 Passenger and freight volumes, by mode of transport.

Secondary Sustainable Development Goals



17. PARTNERSHIPS FOR THE GOALS 17.17 Encourage and promote effective public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.

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. 8.5.1 Average hourly earnings of female and male employees, by occupation, age and persons with disabilities.

8.5.2 Unemployment rate, by sex, age and persons with disabilities.

Secondary Sustainable Development Goals



3. GOOD HEALTH AND



4. QUALITY EDUCATION



5. GENDER EQUALITY



INEQUALITIES

16. PEACE, JUSTICE AND

- 3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.
- 3.8.1 Coverage of essential health services (defined as the average coverage of essential services based on tracer interventions that include reproductive, maternal, new-born and child health, infectious diseases, non-communicable.

diseases and service capacity and access, among the general and the most disadvantaged population).

- 3.8.2 Proportion of population with large household expenditures on health as a share of total household expenditure or income.
- 4.7 By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship and appreciation of cultural diversity and of culture's contribution to sustainable development.
- 5.1 End all forms of discrimination against all women and girls everywhere.
- 5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.
- 5.5.1 Proportion of seats held by women in (a) national parliaments and (b) local governments.
- 5.5.2 Proportion of women in managerial positions.
- 10.2 By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
- 10.2.1 Proportion of people living below 50 per cent of median income, by sex, age and persons with disabilities.
- 10.3 Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.
- 10.3.1 Proportion of population reporting having personally felt discriminated against or harassed in the previous 12 months on the basis of a ground of discrimination prohibited under international human rights law.

16.7 Ensure responsive, inclusive, participatory and representative decision-making at all levels.

16.7.1 Proportions of positions (by sex, age, persons with disabilities and population groups) in public institutions (national and local legislatures, public service, and judiciary) compared to national distributions.

16.B Promote and enforce non-discriminatory laws and policies for sustainable development.

16.B.1 Proportion of population reporting having personally felt discriminated against or harassed in the previous 12 months on the basis of a ground of discrimination prohibited under international human rights law.

Caring for the Environment

Primary Sustainable Development Goals

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

12.5.1 National recycling rate, tons of material recycled.

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

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.

13.2.1 Number of countries that have communicated the establishment or operationalization of an integrated policy/strategy/plan which increases their ability to adapt to the adverse impacts of climate change, and foster climate resilience and low greenhouse gas emissions development in a manner that does not threaten food production (including a national adaptation plan, nationally determined contribution, national communication, biennial update report or other).

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

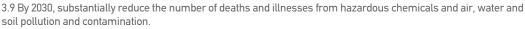
13.3.1 Number of countries that have integrated mitigation, adaptation, impact reduction and early warning into primary, secondary and tertiary curricula.

13.3.2 Number of countries that have communicated the strengthening of institutional, systemic and individual capacity-building to implement adaptation, mitigation and technology transfer, and development actions.

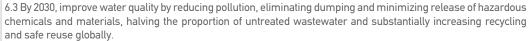
Secondary Sustainable Development Goals

1

13. CLIMATE ACTION



3.9.1 Mortality rate attributed to household and ambient air pollution.



6.B Support and strengthen the participation of local communities in improving water and sanitation management.

6.4.1 Change in water-use efficiency over time.

6.4.2 Level of water stress: freshwater withdrawal as a proportion of available freshwater resources.

7.3 By 2030, double the global rate of improvement in energy efficiency.

7.3.1 Energy intensity measured in terms of primary energy and GDP.

11.6 By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.

11.6.1 Proportion of urban solid waste regularly collected and with adequate final discharge out of total urban solid waste generated, by cities.

15.1 By 2020, ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements.

15.1.2 Proportion of important sites for terrestrial and freshwater biodiversity that are covered by protected areas, by ecosystem type.

15.5 Take urgent and significant action to reduce the degradation of natural habitats, halt the loss of biodiversity and, by 2020, protect and prevent the extinction of threatened species.

15.9 By 2020, integrate ecosystem and biodiversity values into national and local planning, development processes, poverty reduction strategies and accounts.

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

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.





17. PARTNERSHIPS



15. LIFE ON LAND



11. SUSTAINABLE CITIES AND COMMUNITIES



7. AFFORDABLE ANI



Collaboration with Local Communities and Social Work

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

17.17.1 Amount of United States dollars committed to (a) public-private partnerships and (b) civil society partnerships.



Secondary Sustainable **Development Goals**









11. SUSTAINABLE CITIES AND COMMUNITIES





- 1.2 By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions.
- 1.2.1 Proportion of population living below the national poverty line, by sex and age
- 1.2.2 Proportion of men, women and children of all ages living in poverty in all its dimensions according to national
- 3.6 By 2020, halve the number of global deaths and injuries from road traffic accidents.
- 3.6.1 Death rate due to road traffic injuries.
- 4.5 By 2030, eliminate gender disparities in education and ensure equal access to all levels of education and vocational training for the vulnerable, including persons with disabilities, indigenous peoples and children in vulnerable
- 4.5.1 Parity indices (female/male, rural/urban, bottom/top wealth quintile and others such as disability status, indigenous peoples and conflict-affected, as data become.
- available) for all education indicators on this list that can be disaggregated.
- 4.A Build and upgrade education facilities that are child, disability and gender sensitive and provide safe, non-violent, inclusive and effective learning environments for all.
- 11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage.
- 11.4.1 Total expenditure (public and private) per capita spent on the preservation, protection and conservation of all cultural and natural heritage, by type of heritage (cultural, natural, mixed and World Heritage Centre designation), level of government (national, regional and local/municipal), type of expenditure (operating expenditure/investment) and type of private funding (donations in kind, private non-profit sector and sponsorship).
- 11.7 By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities.
- 11.7.1 Average share of the built-up area of cities that is open space for public use for all, by sex, age and persons with disabilities.
- 16.5 Substantially reduce corruption and bribery in all their forms.
- 16.6 Develop effective, accountable and transparent institutions at all levels.
- 16.6.1 Primary government expenditures as a proportion of original approved budget, by sector (or by budget codes or similar).
- 16.6.2 Proportion of population satisfied with their last experience of public services.





REPORT PROFILE



The Nea Odos Corporate Responsibility Report for 2018 is the company's 5th Annual Report. It covers the period from 1/1/2018 to 31/12/2018 and focuses on all the key topics that the company has identified. The previous report was referring to year 2017 from 1/1/2017 till 31/12/2017. The company is committed to communicate its activities through a Corporate Responsibility Report on an annual basis.

Report Structure

Report content is based on the strategic priorities identified. It covers the 5 pillars of Corporate Responsibility on which we rely our strategy and actions:

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

Our fifth Corporate Responsibility Report is a continuation of our effort that began in 2014 with the release of our first report and aims to present and communicate our Corporate Responsibility strategy and its practical implementation. The Report is now a platform for dialogue that allows us to

communicate in a systematic, transparent and structured way to our stakeholders and to present our priorities, risks, opportunities and plans for the future.

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 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.).

Shareholder Structure

On 11.12.2018, an authorized transfer of shares of the Concessionaire took place between the Initial Shareholders, in accordance with the provision of Article 9.3.2 (ii) (a) of the Concession Agreement. In particular, the Initial Shareholder "FERROVIAL S.A". transferred to the Initial Shareholder "GEK TERNA HOLDING REAL ESTATE CONSTRUCTION S.A"

all the shares of the Concessionaire that he held, namely 25,005,000 registered shares. Following the above transfer, the Concessionaire's share capital is wholly owned (100%) by "GEK TERNA HOLDING REAL ESTATE CONSTRUCTION S.A."

Financial Information

The financial statements for the year ended December 31st, 2018 are the second prepared by the company in accordance with the IFRS due to the acquisition of control by the parent company GEK TERNA SA.

For the Accounting year up to and including that ended December 31st, 2016, the company kept the accounting books and records and was drawing up its financial statements in accordance with the provisions of N. 4308/2014 "Greek Accounting Standards, Related Arrangements and Other Provisions". The transition date was January 1st, 2016 and to this end comparative figures are presented in accordance with IFRS for the year ended December 31st, 2016 as well as IFRS Statement of Financial Position at the transition date of January 1st, 2016. 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 the suppliers include the support to the Central Greece motorway amount of €35,954,444.00.

Payments to capital providers (€33,275.28 thousand) include

for the first time this year and payments to shareholders, amounting to €27.945 million.

Net sales of Ionia Odos Motorway – A.Th.E. include MTC and ETC toll revenue, other service income, and for the first time income from the lease of Motorist Service Stations.

EXTERNAL ASSURANCE

For the 2018 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 a limited level assurance of the specific data, in accordance with the international standard of verification ISAE 3000.

SUPPORT

The 2018 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
- •Representatives of Departments/Divisions Content Managers: Nikos Katapodis, Eygenia Soufi, Konstantinos Sideris, Foteini Lamprou, Natalia Manara, Giannis Marinopoulos, Gerasimos Monokrousos, Eleni Nianiou, Anastasia Pnevmatikou, Panagiota Stasinou, Panagiota Tsaousi, Giorgos Mayrikos, Natali Kedikoglou, Katerina Katexi, Christina Nikolaou, Maria Zografini, Mixalis Lagoudakis, Magdalini Mparouxou, Giannis Sioutis, Stellios Simopoulos, Panagiotis Galanopoulos, Giannis Orfaniotis, Natalia Dasiou, Christos Bakaras and Antigoni Kazaneli.

CONTACT POINT

You can contact us for comments, questions or suggestions.

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GRI CONTENT INDEX

For the SDG Mapping Service, GRI Services reviewed that the disclosures included in the content index are appropriately mapped against the SDGs.



| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---------------------|---|---|----------|--|
| GRI 101: Foundate | tion 2016 | | | |
| GENERAL DISCL | OSURES | | | |
| | Organizational Profile | | | |
| | 102-1 Name of the organization | 11 | | |
| Disclosures
2016 | 102-2 Activities, brands, products, and services | 11, 12 | | |
| | 102-3 Location of headquarters | 108 | | |
| | 102-4 Location of operations | 11 | | |
| | 102-5 Ownership and legal form | 11, 13 | | |
| | 102-6 Markets served | 11 | | |
| | 102-7 Scale of the organization | 11, 16, 17, 45, 69 | | |
| | 102-8 Information on employees and other workers | 69, 70 | | Promote sustained, inclusive and sustainable economigrowth, full and productive employment and decent wor for all |
| | 102-9 Supply chain | 64-67 | | |
| | 102-10 Significant changes to the organization and its supply chain | 13, 107 | | |
| | 102-11 Precautionary Principle or | 10, 15, 18, 19, | | |
| | approach | 25, 26 | | |
| | 102-12 External initiatives | 22, 23, 35 | | |
| | 102-13 Membership of associations | 22 | | |
| | Strategy | | | |
| | 102-14 Statement from senior decision-maker | 6 | | |
| | 102-15 Key impacts, risks, and opportunities | 6, 13, 18, 19, 32,
37-39, 51, 76, 81,
82, 93 | | |
| | Ethics and Integrity | | | |
| | 102-16 Values, principles, standards, and norms of behaviour | 9, 10 | | 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and buil effective, accountable and inclusive institutions at all levels |
| | Governance | | | |
| | 102-18 Governance structure | 13-15 | | |
| | Stakeholder Engagement | | | |
| | 102-40 List of stakeholder groups | 27-29 | | |
| | 102-41 Collective bargaining agreements | 70 | | Promote sustained, inclusive and sustainable econom
growth, full and productive employment and decent wor
for all |
| | 102-42 Identifying and selecting stakeholders | 27 | | |
| | 102-43 Approach to stakeholder engagement | 27-32 | | |
| | 102-44 Key topics and concerns raised | 27-29, 32 | | |
| | Reporting Practice | | | |
| | 102-45 Entities included in the consolidated financial statements | https://www.
neaodos.gr/
financial-
statements | | |

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|--|---|----------|---|
| | 102-46 Defining report content and topic Boundaries | 25-35 | | |
| | 102-47 List of material topics | 31, 32 | | |
| | 102-48 Restatements of information | 87 | | |
| | 102-49 Changes in reporting | 30, 32 | | |
| | 102-50 Reporting period | 107 | | |
| | 102-51 Date of most recent report | 107 | | |
| | 102-52 Reporting cycle | 107 | | |
| | 102-53 Contact point for questions regarding the report | 108 | | |
| | 102-54 Claims of reporting in accordance with the GRI Standards | 107 | | |
| | 102-55 GRI content index | 109-118 | | |
| | 102-56 External assurance | 119 | | |
| MATERIAL TOP | CS | | | |
| ECONOMIC | | | | |
| | Economic Performance | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| Approach 2016 | 103-2 The management approach and its components | 13-16, 19, 23, 108 | | End poverty in all its forms everywhere; 5. Achieve gender
equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full
and productive employment and decent work for all; 16.
Promote peaceful and inclusive societies for sustainable
development, provide access to justice for all and build
effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 16, 17, 107, 108 | | |
| GRI 201:
Economic
Performance
2016 | 201-1 Direct economic value
generated and distributed | 16 | | End hunger, achieve food security and improved nutrition and promote sustainable agriculture; 5. Achieve gender equality and empower all women and girls; 7. Ensure access to affordable, reliable, sustainable and modern energy for all; 8. Promote sustainable, inclusive and sustainable economic growth, full and productive employment and decent work for all; 9. Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation; |
| | 201-2 Financial implications and other risks and opportunities due to climate change | 81 | | 13. Take urgent action to combat climate change and its impacts |
| | 201-3 Defined benefit plan obligations and other retirement plans | 72 | | |
| | 201-4 Financial assistance received from government | No financial
assistance
received from
government | | |
| | Indirect Economic Impacts | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 25-34, 58 | | |
| Approach 2016 | 103-2 The management approach and its components | 9, 10, 15, 18, 58, 93,
108 | | 1. End poverty in all its forms everywhere; 5. Achieve gender
equality and empower all women and girls; 8. Promote
sustained, inclusive and sustainable economic growth, full and
productive employment and decent work for all; 16. Promote
peaceful and inclusive societies for sustainable development,
provide access to justice for all and build effective, accountable
and inclusive institutions at all levels |

110

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|--|--|-----------------------------------|----------|--|
| | 103-3 Evaluation of the management | AND/OR URL(S) 93, 107, 108 | | |
| GRI 203:
Indirect
Economic
Impacts 2016 | approach 203-1 Infrastructure investments and services supported | 93-101, 58 | | 2. End hunger, achieve food security and improved nutrition
and promote sustainable agriculture 5. Achieve gender
equality and empower all women and girls, 7. Ensure access
to affordable, reliable, sustainable and modern energy for
all, 9. Build resilient infrastructure, promote inclusive and
sustainable industrialization and foster innovation; 11. Make
cities and human settlements inclusive, safe, resilient and
sustainable; |
| | 203-2 Significant indirect economic impacts | 93, 94 | | 1. End poverty in all its forms everywhere; 2. End hunger, achieve food security and improved nutrition and promote sustainable agriculture 3. Ensure healthy lives and promote wellbeing for all at all ages; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 10. Reduce inequality within and among countries; 17. Strengthen the means of implementation and revitalize the global partnership for sustainable development |
| ENVIRONMENT | TAL | | | |
| | Materials | | | |
| GRI 103:
Management | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| Approach 2016 | 103-2 The management approach and its components | 15, 18, 19, 83, 84,
91, 108 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management | 19, 83, 84 | | |
| 001004 | approach | 00.04 | | |
| GRI 301:
Materials 2016 | 301-1 Materials used by weight or volume | 83, 84 | | Promote sustained, inclusive and sustainable economic
growth, full and productive employment and decent work
for all; 12. Ensure sustainable consumption and production
patterns; |
| | Energy | | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| | 103-2 The management approach and its components | 15, 18, 19, 62, 83,
91, 108 | | End poverty in all its forms everywhere; 5. Achieve
gender equality and empower all women and girls; 8.
Promote sustained, inclusive and sustainable economic
growth, full and productive employment and decent work
for all; 16. Promote peaceful and inclusive societies for
sustainable development, provide access to justice for all
and build effective, accountable and inclusive institutions
at all levels |
| | 103-3 Evaluation of the management approach | 19, 67, 83, 91 | | |
| GRI 302:
Energy 2016 | 302-1 Energy consumption within the organization | 83 | | 7. Ensure access to affordable, reliable, sustainable and modern energy for all; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts |
| | 302-2 Energy consumption outside of the organization | 83 | | 7. Ensure access to affordable, reliable, sustainable and modern energy for all; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts |

GRI 102-55 111

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|---|------------------------------------|----------|---|
| | 302-4 Reduction of energy consumption | 62, 83 | | 7. Ensure access to affordable, reliable, sustainable and modern energy for all; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts |
| | Biodiversity | | | |
| GRI 103:
Management | 103–1 Explanation of the material topic and its Boundary | 25-34, 89 | | |
| Approach 2016 | 103-2 The management approach and its components | 15, 18, 19, 89, 91,
108 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 19, 91 | | |
| 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 | 89 | | 6. Ensure availability and sustainable management of water and sanitation for all; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | 304-2 Significant impacts of activities, products, and services on biodiversity | 89 | | 6. Ensure availability and sustainable management of water and sanitation for all; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | 304-3 Habitats protected or restored | 89 | | 6. Ensure availability and sustainable management of water and sanitation for all; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |
| | Emissions | | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| | 103-2 The management approach and its components | 15, 18, 19, 88, 91,
108 | | 1. End poverty in all its forms everywhere: 5. Achieve gender equality and empower all women and girls: 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all: 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 88, 89, 91 | | |
| GRI 305:
Emissions 2016 | 305-1 Direct (Scope 1) GHG emissions | 88 | | 3. Ensure healthy lives and promote wellbeing for all at all ages; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts;14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss |

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| emissions September 25 State urps statishable cressurppins and producting patters; [2] has urps action be cannot attend to patters; [2] has urps action be cannot attend to patters; [2] has urps action be cannot attend to control or an extendible development. If Prestor actions and marrier resources for subtainable development. If prestor actions and marrier resources for subtainable development. If prestor actions and promote subtainable use of terretarial ecosystems, sustainable marrier events and marrier resources for subtainable use of terretarial ecosystems. Sustainable use of terretarial ecosystems and terretarial ecosystems and marrier resources for subtainable use of terretarial ecosystems. Sustainable use of terretarial ecosystems and marrier resources for subtainable use of terretarial ecosystems. Sustainable events under department of the marrier events under department of the events and department of the events and department of the events and department of the event of the | GRI STANDARD | DISCLOSURE | | SDG LINKAGE TO DISCLOSURE |
| impacts 14. Conserve and sustainably use the oceans, said evelopment, 15. Protect, resider and promote sustainable case of increasing and marriar resources for sustainable development, 15. Protect, resider and promote sustainable case of increasing and halt biodiversity loss. 305-7 Nitrogen oxides (SDX), and other significant air emissions 87 3. Ensure healthy lives and promote veilbleing for all at all special protection and analysis of the protection patterns, 13. Take urgan action to combat climate development, 15. Protect reside and sustainable consumption and production patterns, 13. Take urgan action to combat climate development, 15. Protect reside and sustainable consumption and production patterns, 13. Take urgan action to combat climate development, 15. Protect reside and sustainable consumption and production patterns, 13. Take urgan action to combat climate development and its impacts, 14. Conserve and sustainable consumption and the sustainable consumption and production and halt and reverse land degradation and halt biodiversity loss. 87 87 88 89 103-2 The management approach and its components 103-2 The management approach and its components 103-2 The management approach and its components 103-3 Evaluation of the management and the sustainable development and production and actions and approach and its components 103-3 Evaluation of the management approach and its component and production patterns and approach approach and production patterns and approach approach and production patterns and approach approach and production patterns. 103-2 Waste by type and disposal as 85, 86 103-2 Waste by type and disposal as 85, 86 | | | 88 | ages; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts;14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land |
| sulphur oxides (SDX), and other significant air emissions Effluents and Waste Effluents and Waste GRI 103. Management Approach 2016 The management approach and is impact in a consumption and production patterns is 1.7 lake urgent action and halt and reverse land degradation and halt biodiversity loss The management approach and its Components The management approach and its Components The management and its Components and its Component and Its Co | | 305-4 GHG emissions intensity | 88 | impacts;14. Conserve and sustainably use the oceans, seas
and marine resources for sustainable development; 15.
Protect, restore and promote sustainable use of terrestrial
ecosystems, sustainably manage forests, combat
desertification, and halt and reverse land degradation and |
| 103-1 Explanation of the material opic and its Boundary 25-34 | | sulphur oxides (SOX), and other | 87 | ages; 12. Ensure sustainable consumption and production patterns; 13. Take urgent action to combat climate change and its impacts;14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land |
| Management Approach 2016 103-2 The management approach and its components 15, 18, 19, 62, 81, 85, 86, 91, 108 1. End poverty in all its forms everywhere, 5. Achieve gender equality and empower all women and girls: 8. Promote sustained, inclusive and sustainable economic growth, full any productive employment and decent work for all: 16. Promote peaceful and inclusive societies for sustainable decembers, and build effective, accountable and inclusive societies for sustainable decembers, and build effective, accountable and inclusive institutions at all levels 103-3 Evaluation of the management approach approach 206-1 Water discharge by quality and 86, 87 3. Ensure healthly lives and promote wellbeing for all at all ages. 8. Ensure availability and sustainable management of water and salitation for all: 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainable the oceans, seas and marine resources for sustainable development. 306-2 Waste by type and disposal 85, 86 3. Ensure healthly lives and promote wellbeing for all at all ages. 8. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainable development. 306-2 Waste by type and disposal 85, 86 3. Ensure healthly lives and promote wellbeing for all at all ages. 8. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainable development. 15°, Protect. restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combatter development. 15°, Protect. restore and pro | | Effluents and Waste | | |
| and its components 85, 86, 91,108 gender equality and empower all women and girts, 8, 8, Promote sustained, inclusive and sustainable economic growth. full and productive employment and decent work for all. 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels 306-1 Water discharge by quality and destination 316-1 Water discharge by quality and assistantable management 316-2 Waste by type and disposal 85, 86 316-2 Waste by type and disposal 85, 86 316-3 Significant spills 316-3 Significant spills 317-4 Significant spills 318-4 Transport of hazardous waste 318-4 Transport of hazardous waste 318-6 Significant spills 318-7 Significant s | Management | • | 25-34 | |
| approach GRI 306: Effluents and Waste 2016 306-1 Water discharge by quality and 86, 87 destination 306-1 Water discharge by quality and 86, 87 destination 306-2 Waste by type and disposal 85, 86 method 306-2 Waste by type and disposal 85, 86 method 306-3 Significant spills 81 3. Ensure healthy lives and promote wellbeing for all at all ages; 6. Ensure availability and sustainable management of water and sanitation for all, 12. Ensure sustainable consumption and production patterns: 306-3 Significant spills 81 3. Ensure healthy lives and promote wellbeing for all at all ages; 6. Ensure availability and sustainable management of water and sanitation for all, 12. Ensure sustainable consumption and production patterns 306-3 Significant spills 81 3. Ensure healthy lives and promote wellbeing for all at all ages; 6. Ensure availability and sustainable management of water and sanitation for all, 12. Ensure sustainable consumption and production patterns: 14. Conserve and sustainable use of terrestrial ecosystems, sustainable endered terrestrial ecosystems and promote wellbeing for all at all ages; 12. Ensure sustainable consumption and production and halt and r | | • | | gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions |
| Effluents and Waste 2016 destination desti | | • | 81, 85, 86, 91 | |
| method ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns 3. Ensure healthy lives and promote wellbeing for all at all ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns: 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss 3. Ensure healthy lives and promote wellbeing for all at all ages; 12. Ensure sustainable consumption and production | Effluents and | 0 , 1 , | 86, 87 | ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainably use the oceans, seas and marine resources for |
| ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development; 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss 306-4 Transport of hazardous waste 86 3. Ensure healthy lives and promote wellbeing for all at all ages; 12. Ensure sustainable consumption and production | | | 85, 86 | ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable |
| ages; 12. Ensure sustainable consumption and production | | 306-3 Significant spills | 81 | ages; 6. Ensure availability and sustainable management of water and sanitation for all; 12. Ensure sustainable consumption and production patterns; 14. Conserve and sustainably use the oceans, seas and marine resources for sustainable development: 15. Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and |
| | | 306-4 Transport of hazardous waste | 86 | ages; 12. Ensure sustainable consumption and production |

GRI 102-55 113

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S) OMISSION
AND/OR URL(S) | SDG LINKAGE TO DISCLOSURE |
|---|--|---|--|
| | 306-5 Water bodies affected by water discharges and/or runoff | 86 | Ensure availability and sustainable management of
water and sanitation for all; 15. Protect, restore and
promote sustainable use of terrestrial ecosystems,
sustainably manage forests, combat desertification, and
halt and reverse land degradation and halt biodiversity loss |
| | Environmental Compliance | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 18, 25-34 | |
| | 103-2 The management approach and its components | 15, 18, 19, 81, 82
91, 108 | End poverty in all its forms everywhere; 5. Achieve
gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic
growth, full and productive employment and decent work
for all; 16. Promote peaceful and inclusive societies for
sustainable development, provide access to justice for all
and build effective, accountable and inclusive institutions
at all levels |
| | 103–3 Evaluation of the management | 18, 19, 91 | |
| GRI 307: | approach 307-1 Non-compliance with | 18, 91 | 16. Promote peaceful and inclusive societies for sustainable |
| Environmental
Compliance
2016 | environmental laws and regulations | 10, 71 | development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | Supplier Environmental Assessi | ment | |
| GRI 103:
Management
Approach 2016 | 103–1 Explanation of the material topic and its Boundary | 25-34 | |
| | 103-2 The management approach and its components | 15, 18, 64-67, 82,
91, 108 | End poverty in all its forms everywhere; Achieve gender equality and empower all women and girls; Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Fromote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 82, 67 | |
| GRI 308:
Supplier
Environmental
Assessment
2016 | 308-1 New suppliers that were screened using environmental criteria | 18, 65 | |
| 2010 | 308-2 Negative environmental impacts in the supply chain and actions taken | 65 | |
| SOCIAL | | | |
| | Employment | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | |
| | 103-2 The management approach and its components | 15, 18, 69, 71, 79,
108 | End poverty in all its forms everywhere; 5. Achieve
gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic
growth, full and productive employment and decent work
for all; 16. Promote peaceful and inclusive societies for
sustainable development, provide access to justice for all
and build effective, accountable and inclusive institutions
at all levels |
| | | | |

114

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|---|------------------------------------|----------|--|
| | 103-3 Evaluation of the management approach | 71, 79 | | |
| GRI 401:
Employment
2016 | 401-1 New employee hires and employee turnover | 71 | | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees | 72 | | 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | 401-3 Parental leave | 72 | | 5. Achieve gender equality and empower all women and girls: 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all temporary or part-time employees |
| | Occupational Health and Safety | | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| | 103-2 The management approach and its components | 15, 18, 19, 76-78,
108 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 19, 76, 79 | | |
| GRI 403:
Occupational
Health and
Safety 2018 | 403-1 Workers representation in formal joint management—worker health and safety committees | 76, 77 | | |
| | 403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities | 76 | | |
| | 403-3 Workers with high incidence or high risk of diseases related to their occupation | 76, 78 | | |
| | 403-4 Worker participation, consultation, and communication on occupational health and safety | 77 | | |
| | 403-5 Worker training on occupational health and safety | 78 | | |
| | 403-6 Promotion of worker health | 76, 78 | | |
| | 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships 2. | 76, 78 | | |
| | 403-8 Workers covered by an occupational health and safety management system | 76, 77 | | |
| | 403-9 Work-related injuries | 78 | | |

| GRI STANDARD | DISCLOSURE | PAGE NUMBER(S) AND/OR URL(S) OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|--|---------------------------------------|--|
| | 403-10 Work-related ill health | 76, 78 | |
| | Training and Education | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | |
| | 103-2 The management approach and its components | 15, 18, 73, 78, 79,
108 | End poverty in all its forms everywhere; 5. Achieve
gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic
growth, full and productive employment and decent work
for all; 16. Promote peaceful and inclusive societies for
sustainable development, provide access to justice for all
and build effective, accountable and inclusive institutions
at all levels |
| | 103-3 Evaluation of the management approach | 73-75, 78, 79 | |
| GRI 404:
Training and
Education 2016 | 404-1 Average hours of training per
year per employee | 74 | 4. Ensure inclusive and equitable quality education and
promote lifelong learning opportunities for all; 5. Achieve
gender equality and empower all women and girls; 8.
Promote sustained, inclusive and sustainable economic
growth, full and productive employment and decent work
for all |
| | 404-3 Percentage of employees receiving regular performance and career development reviews | 73, 79 | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all |
| | Diversity and Equal Opportunity | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | |
| | 103-2 The management approach and its components | 9, 10, 15, 18, 72, 79,
108 | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 15, 72 | |
| GRI 405:
Diversity
and Equal
Opportunity | 405-1 Diversity of governance bodies and employees | 15, 72 | Achieve gender equality and empower all women and
girls: 8. Promote sustained, inclusive and sustainable
economic growth, full and productive employment and
decent work for all |
| 2016 | 405-2 Ratio of basic salary and remuneration of women to men | 72 | 5. Achieve gender equality and empower all women and girls: 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all: 10. Reduce inequality within and among countries |
| | Non-discrimination | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | |
| | 103-2 The management approach and its components | 9, 10, 15, 18, 19, 69,
72, 79, 108 | End poverty in all its forms everywhere: 5. Achieve gender equality and empower all women and girls: 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all: 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels. |

116

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|---|--|----------|---|
| | 103-3 Evaluation of the management approach | | | |
| GRI 406: Non-
discrimination
2016 | 406-1 Incidents of discrimination and corrective actions taken | 72 | | 5. Achieve gender equality and empower all women and girls; 8. Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | Local Communities | | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| | 103-2 The management approach and its components | 9, 10, 15, 18, 58, 66,
93, 101, 108 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 58, 66, 93 | | |
| GRI 413: Local
Communities
2016 | 413-1 Operations with local community engagement, impact assessments, and development programs | 58, 93-100 | | |
| | 413-2 Operations with significant actual and potential negative impacts on local communities | 58, 66, 93-100 | | End poverty in all its forms everywhere; 2. End hunger achieve food security and improved nutrition and promote sustainable agriculture |
| | Customer Health and Safety | | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34 | | |
| | 103-2 The management approach and its components | 9, 10, 15, 18, 19, 37,
49, 108 | | 1. End poverty in all its forms everywhere; 5. Achieve gender equality and empower all women and girls; 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 39, 40, 46-49 | | |
| GRI 416:
Customer
Health and
Safety 2016 | 416-1 Assessment of the health
and safety impacts of product and
service categories | 37-49 | | |
| , , | 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services | 8, 18 | | 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | Marketing and Labelling | | | |
| GRI 103:
Management
Approach 2016 | 103-1 Explanation of the material topic and its Boundary | 25-34, 53-55 | | |

| GRI STANDARD | DISCLOSURE | PAGE
NUMBER(S)
AND/OR URL(S) | OMISSION | SDG LINKAGE TO DISCLOSURE |
|---|--|------------------------------------|----------|--|
| | 103-2 The management approach and its components | 9, 10, 15, 18, 19, 26,
52, 108 | | End poverty in all its forms everywhere; Achieve gender equality and empower all women and girls; Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all; Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 103-3 Evaluation of the management approach | 38, 42, 45, 49, 101 | | |
| GRI 417:
Marketing and
Labelling 2016 | 417-1 Requirements for product and service information and labelling | 38, 41, 42, 45 | | 12. Ensure sustainable consumption and production
patterns: 16. Promote peaceful and inclusive societies for
sustainable development, provide access to justice for al
and build effective, accountable and inclusive institutions
at all levels |
| | 417-2 Incidents of non-compliance concerning product and service information and labelling | 8, 18, 101 | | 16. Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels |
| | 417-3 Incidents of non-
compliance concerning marketing
communications | 8, 18 | | |



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 2018 Corporate Responsibility Report of Nea Odos S.A. for the fiscal year ended on December 31st, 2018 ("selected data"), in accordance with the Global Reporting Initiative (GRI) Standards ("GRI-Standards").

Scope

We performed our engagement in accordance with International Standard on Assurance Engagements 3000, 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 2018 Corporate Responsibility Report, with regard to:

| The completeness and accuracy of quantitative data and the plausibility of statements related |
|---|
| to GRI 102: General Disclosures. |

- ☐ The "In accordance" Core adherence related to GRI Standards.
- The completeness and accuracy of Disclosures on Management Approach, which correspond to seven (7) material issues: "Economic Performance", "Energy", "Emissions", "Employment", "Training and Education", "Local Communities" and "Customer Health and Safety".
- □ The completeness and accuracy of the GRI Topic specific Standards on the previous seven material issues (Disclosures 201-1, 302-1, 305-1, 305-2, 401-1, 404-1, 404-3, 413-2, 416-1).

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 2018 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.

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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, 2018, as these were included in the 2018 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 2018 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:

| ce | cedures followed with regard to the selected data included: | | | | | | |
|----|--|--|--|--|--|--|--|
| | Interviews with executives and key personnel responsible for the relevant information and | | | | | | |
| | assumptions. | | | | | | |
| | Visits to the Company premises. | | | | | | |
| | Review and assessment of the processes and controls used to collect, aggregate, validate and | | | | | | |
| | report the data; | | | | | | |
| | Sample tests on collected data, conversion factors and formulas, where required. | | | | | | |
| | Review of the GRI Content Index found on pages 109-118 of the 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 moral 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 2018 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, under the scope of our engagement, would cause us to believe that the quantitative data of the Report that relates to the GRI 102: General Disclosures is incomplete. Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that errors or inaccuracies exist both in the collation of the quantitative data and in the transposition of this data to the Report. Nothing has come to our

- attention that, under the scope of our engagement, would cause us to believe that errors or inaccuracies exist in the GRI 102: General Disclosures that would significantly affect the ability of stakeholders to extract suitable and valid conclusions for the Company's performance.

 Nothing has come to our attention that would cause us to believe that the Report does not meet the requirements of the "In accordance" Core option.

 Nothing has come to our attention regarding inaccuracies as to the completeness and accuracy
- Nothing has come to our attention regarding inaccuracies as to the completeness and accuracy of the Disclosures on Management to the seven (7) material aspects under the scope of our engagement.
- Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that the quantitative data of the Report that relates to the 201-1, 302-1, 305-1, 305-2, 401-1, 404-1, 404-3, 413-2 and 416-1, disclosures on seven (7) material aspects of GRI Standards, are incomplete. Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that errors or inaccuracies exist with regard to the aforementioned disclosures both in the collation of the quantitative data and in the transposition of this data to the Report. Nothing has come to our attention that, under the scope of our engagement, would cause us to believe that inaccuracies exist in the aforementioned disclosures that would significantly affect the ability of interested parties to extract suitable and valid conclusions for the Company's performance.

Athens, 12/12/2019
The Chartered Accountant

Maria Eleni Bouzoura

CPA (GR) Reg. No.30511



Chartered Accountants Management Consultants 56, Zefirou str., 175 64 Palaio Faliro, Greece Registry Number SOEL 127

