SEMI-ANNUAL REPORT ON THE IMPLEMENTATION OF THE ENVIRONMENTAL TERMS DURING THE OPERATION AND MAINTENANCE OF THE PATHE MOTORWAY, "SKARFEIA – RACHES" SECTION, AND OF THE CENTRAL GREECE MOTORWAY (E65), "LAMIA – KALAMBAKA" SECTION

PROJECT: "DESIGN – CONSTRUCTION – FINANCING – OPERATION – MAINTENANCE AND EXPLOITATION OF THE PROJECT "CENTRAL GREECE MOTORWAY (E65)"



Date	30/06/2026
Prepared by:	Concessionaire

REPORTING PERIOD
1ST HALF OF 2026

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1. INTRODUCTION



This Environmental Management Report presents the Environmental Management Processes of KENTRIKI ODOS S.A. during the operation and maintenance of the Concession Project for the first half of 2026 (01/01/2026 to 30/06/2026).



ODOS KENTRIKIS ELLADOS S.A. implements a programme for monitoring environmental impacts, in accordance with the Concession Agreement and the approved Environmental Terms (ET) of the project. The programme is implemented in such a way as to have a multiple beneficial effect on the man-made and natural environment of the areas of influence, and to serve users in the best possible way, on the **Skarfeia – Raches section (57 km) of the PATHE Motorway – E65** and on the **Lamia – Kalampaka section (136 km) of the E65 Motorway**.

Environmental and social parameters are monitored in such a way as to enable the timely identification of any harmful trends and to make it possible to reduce and/or eliminate negative effects by intervening with appropriate protective measures. In addition, continuous monitoring allows the effectiveness of the proposed protection measures to be assessed, so as to ensure the long-term protection of the environmental parameters affected by the operation and maintenance of the motorway. Qualitative and quantitative data are collected and recorded during the continuous monitoring of the ET with the additional aim of contributing to improved knowledge of the impacts that the construction of such projects may have on a similar environment.



On the PATHE Motorway, "Skarfeia – Raches" section, and on the E65 Motorway, "Lamia – Kalampaka" section, a comprehensive environmental monitoring programme is implemented, through which the Environmental Terms are complied with, as detailed below.

2. PROJECT DESCRIPTION

2.1 PATHE Motorway E65

State: Hellenic Republic

Concessionaire: ODOS KENTRIKIS ELLADOS S.A.

Motorway: PATHE

Section: Skarfeia – Raches

The Skarfeia – Raches section of the PATHE Motorway comprises:

1. 12 (twelve) Interchanges

The Skarfeia – Raches section of the PATHE Motorway comprises:



- Skarfeia Half-Interchange at approx. Ch. 185+500
- Molos Interchange at approx. Ch. 190+500
- Thermopylae Half-Interchange at approx. Ch. 198+500
- Bralos (Thermopylae) Interchange at approx. Ch. 203+000
- E65 Half-Interchange at approx. Ch. 207+000
- Anthili Half-Interchange at approx. Ch. 210+000
- Roditsa Interchange at approx. Ch. 212+500
- Agia Paraskevi Interchange at approx. Ch. 217+500
- Agia Marina Interchange at approx. Ch. 223+500
- Stylida – Karavomylos Interchange at approx. Ch. 232+000
- Karavomylos – Achinos Interchange at approx. Ch. 237+000
- Raches Half-Interchange at approx. Ch. 241+000

2. 2 (two) Mainline & 8 (eight) Lateral Toll Stations

i. Mainline



- Agia Triada at approx. Ch. 195+000
- Mavromantila at approx. Ch. 220+000

ii. Lateral

- 2 at the Molos Interchange at approx. Ch. 190+500
- 2 at the Thermopylae Interchange at approx. Ch. 203+000
- 2 at the Agia Marina Interchange at approx. Ch. 223+500
- 2 at the Karavomylos Interchange at approx. Ch. 232+000

3. 6 (six) Temporary Parking Areas – Parking

- At approx. Ch. 188+000 towards Lamia
- At approx. Ch. 188+000 towards Athens
- At approx. Ch. 221+500 towards Lamia

- At approx. Ch. 221+500 towards Athens
- At approx. Ch. 239+500 towards Lamia
- At approx. Ch. 239+500 towards Athens

4. 6 (six) tunnels

- From approx. Ch. 225+800 to approx. Ch. 226+500, both directions
- From approx. Ch. 227+500 to approx. Ch. 228+500, both directions
- From approx. Ch. 228+500 to approx. Ch. 229+000 (towards Lamia)
- From approx. Ch. 228+700 to approx. Ch. 229+000 (towards Thessaloniki)

5. 3 Snow Clearance Stations (SCS)

- Agia Triada SCS at approx. Ch. 195+000
- Agia Marina SCS at approx. Ch. 223+500
- Stylida SCS at approx. Ch. 232+000

The sections of the Concession Agreement Project are divided into five (5) Geographical Units (GU).

S/N	SECTION	Km
1	Skarfeia - Thermopylae	17.32
2	Thermopylae - Spercheios (excluding the bridge under construction by ERGOSE)	8.50
3	Spercheios - Agia Paraskevi Interchange	3.50
4	Agia Paraskevi Interchange - Agia Marina Interchange	8.50
5	Agia Marina Interchange - Raches	19.20

2.2 Central Greece Motorway (E65)

The Central Greece Motorway, Lamia – Kalampaka Section, comprises:

1. 12 Interchanges

- Lamia Interchange at approx. Ch. 5+700
- Karpenisi Interchange at approx. Ch. 14+
- Xyniada Interchange at approx. Ch. 31+7
- Smokovo Half-Interchange at approx. Ch.
- Anavra Interchange at approx. Ch. 60+25
- Sofades Interchange at approx. Ch. 71+90
- Karditsa Interchange at approx. Ch. 80+4
- Proastio Interchange at approx. Ch. 97+0
- Longos Half-Interchange at approx. Ch. 1
- Trikala Interchange at approx. Ch. 110+94
- Vasiliki Interchange at approx. Ch. 122+780
- Kalampaka Interchange at approx. Ch. 135+450



2. 3 Mainline and 4 Lateral Toll Stations

i. Mainline (2):

- Lianokladi at approx. Ch. 17+000
- Sofades at approx. Ch. 66+000
- Trikala at approx. Ch. 105+500



ii. Ramp (3):

- 2 at the Anavra Interchange at approx. Ch. 61+000
- 2 at the Proastio Interchange at approx. Ch. 97+500
- 2 at the Trikala Interchange at approx. Ch. 111+500
- 2 at the Kalampaka Interchange at approx. Ch. 135+450

3. 3 Motorway Service Areas (MSA)

- Lianokladi MSA at approx. Ch. 12+500, both sides (not yet constructed)
- Sofades MSA at approx. Ch. 70+500, both sides
- Trikala MSA at approx. Ch. 116+600, one side (not yet constructed)

4. 12 parking areas

- At approx. Ch. 130+300 towards Lamia
- At approx. Ch. 130+300 towards Egnatia



- At approx. Ch. 105+000 towards Lamia
- At approx. Ch. 102+000 towards Egnatia
- At approx. Ch. 86+500 towards Lamia
- At approx. Ch. 86+500 towards Egnatia
- At approx. Ch. 52+000 towards Lamia
- At approx. Ch. 52+000 towards Egnatia
- At approx. Ch. 35+000 towards Lamia
- At approx. Ch. 35+000 towards Egnatia
- At approx. Ch. 19+350 towards Lamia
- At approx. Ch. 19+350 towards Egnatia



5. Three Operation & Maintenance Centres (OMC)

- Lianokladi OMC at approx. Ch. 12+800
- Sofades OMC at approx. Ch. 70+500
- Kalampaka OMC (and Fire Service and Police Buildings) at approx. Ch. 131+600

6. 3 Snow Clearance Stations



- Xyniada SCS (at approx. Ch. 43+500)
- Sofades SCS (same location as OMC/TMC/MSA) at approx. Ch. 70+5000
- Trikala SCS (at approx. Ch. 105+500)

7. 3 Tunnels

- Twin tunnel (T2), 2,983 m long, from Ch. Ch. 26+800 to Ch. 29+783
- Twin tunnel (T3A), 113 m long, at approx. Ch. 45+500
- Twin tunnel (T3), 387 m long, at approx. Ch. 46+000

8. 22 Bridges > 50 m



- Bridge with a length of approx. 150 m at approx. Ch. 20+3
- Bridge with a length of approx. 200 m at approx. Ch. 21+2
- Bridge with a length of approx. 200 m at approx. Ch. 21+2
- Bridge with a length of approx. 100 m at approx. Ch. 20+9
- Bridge with a length of approx. 90 m at approx. Ch. 20+94
- Bridge with a length of approx. 90 m at approx. Ch. 21+513
- Bridge with a length of approx. 70 m at approx. Ch. 21+506
- Bridge with a length of approx. 100 m at approx. Ch. 24+025
- Bridge with a length of approx. 100 m at approx. Ch. 24+025
- Bridge with a length of approx. 70 m at approx. Ch. 24+700
- Bridge with a length of approx. 70 m at approx. Ch. 24+700

- Bridge with a length of approx. 140 m at approx. Ch. 25+365.00
- Bridge with a length of approx. 140 m at approx. Ch. 25+365.00
- Bridge with a length of approx. 70 m at approx. Ch. 48+500
- Bridge with a length of approx. 160 m at approx. Ch. 49+000
- Bridge with a length of approx. 295 m at approx. Ch. 51+000
- Bridge with a length of approx. 150 m at approx. Ch. 54+000
- Bridge with a length of approx. 150 m at approx. Ch. 55+500
- Bridge with a length of approx. 51.5 m at approx. Ch. 70+500
- Bridge with a length of approx. 92 m at approx. Ch. 90+000 (Kalentzis River)
- Bridge with a length of approx. 587 m at approx. Ch. 103+500 (Pineios River)
- Bridge with a length of approx. 74 m at approx. Ch. 110+500 (Trikala – Larissa National Road)

The chainages are presented in Annex I.

It should be noted that in April 2024 the newly completed sections Lamia - Xyniada and Trikala - Kalampaka were opened to traffic (the middle section Xyniada - Trikala has been in operation since December 2017), with the result that the Central Greece Motorway (E65) has been completed from Lamia to Kalampaka, with a total length of 136 km. The E65 is expected to be completed within 2026 with its connection to Egnatia Odos.

3. SUPERVISING AUTHORITIES (PROJECT BODIES)

The Supervising Authorities of the Concession Project are:

- **Special Service for Public Works / Construction of Transport Works under Concession Contracts** (EYDE / KSESP), 5 Karystou Street, 115 23 Athens,

- **Directorate D17, Directorate for the Operation, Maintenance & Exploitation of Infrastructure under Concession Contracts**, 70 Panormou Street, 115 23 Athens,

Concessionaire: ODOS KENTRIKIS ELLADAS S.A.
Motorway: PATHE (Skarfeia - Raches & E-65 (Lamia - Kalampaka)
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4. ENVIRONMENTAL PERMITTING

4.1 JMD-AEPO (Joint Ministerial Decisions Approving Environmental Terms) and their Validity – Current Status

4.1.1 PATHE: Skarfeia – Raches Section

S/N	Section	Validity of ET	ET Decisions Issued
1	**Skarfeia - Thermopylae**	The AEPO for the section is valid until 27-12-2028 (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA 96975/4083/27-12-2018)	**MAIN PROJECT** • JMD Ref. No. 146113/12.07.2005, Approval of Environmental Terms. • JMD Ref. No. 129696/06.06.2007. Amendment of Environmental Terms. • GDEP/DIPA 96975/4083/27.12.2018. Amendment and renewal of Environmental Terms. • GDEP/DIPA 85272/3419/27.11.2018: Amendment of Environmental Terms for the construction and operation of 6 parking areas. • GDEP/DIPA 3048/162/05.08.2020. Adaptation to the requirements of JMD 1915/2018 (Government Gazette B' 304). **ANCILLARY WORKS** • EYPE 122881/08.03.2010, Environmental licensing of the Agia Triada and Molos Interchange toll stations. • YPEN/GDEP/DIPA under Ref. No. YPEN/DIPA/100795/6801, submission of a Technical Report on the remediation of cutting failures at approximately Ch. 193+600 of the PATHE Motorway near the Agia Triada Toll Station.
2	**Thermopylae Interchange – New Spercheios Riverbed**	The AEPO for the section is valid until 04-08-2027 (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)	**MAIN PROJECT** • JMD Ref. No. 131550/04.03.2003, Approval of Environmental Terms. • GDEP/DIPA 146836/05.03.2015 Amendment and renewal of Environmental Terms. • GDEP/DIPA 3048/162/05.08.2020. Adaptation to the requirements of JMD 1915/2018 (Government Gazette B' 304). • Decision of GDEP/DIPA under Ref. No. YPEN/DIPA/28675/1671/01.08.2025.

			Declaratory Act implementing Article 2, para. 8a, of Law 4014/2011, as in force, for the extension of the period of validity of the AEPOs for the Concession project "Central Greece Motorway (E65) from Thermopylae to Raches. **ANCILLARY WORKS** • EYPE 121668/08.02.2010 Environmental licensing of the toll station at the location of the Thermopylae Interchange.
3	**New Spercheios Riverbed - Roditsa Interchange**	The AEPO for the section is valid until 04-08-2027 (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)	**MAIN PROJECT** • JMD Ref. No. 146109/30.09.2005 Approval of Environmental Terms • GDEP/DIPA 145496/21.01.2015. Amendment of the Environmental Terms • GDEP/DIPA 60908/1786/14.09.2018. Renewal of Environmental Terms. • GDEP/DIPA 3048/162/05.08.2020. Adaptation to the requirements of JMD 1915/2018 (Government Gazette B' 304). • Decision of GDEP/DIPA under Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act implementing Article 2, para. 8a, of Law 4014/2011, as in force, for the extension of the period of validity of the AEPOs for the Concession project "Central Greece Motorway (E65) from Thermopylae to Raches.
4	**Lamia – Raches**	The AEPO for the section is valid until 04-08-2027 (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)	**MAIN PROJECT** • JMD 130665/02.05.2003 Approval of Environmental Terms. • JMD 195214/11.01.2011 amendment of Environmental Terms. • GDEP/DIPA 13590/15.03.2016 Renewal and amendment of the Environmental Terms. • GDEP/DIPA 85272/3419/27.11.2018: Amendment of Environmental Terms for the construction and operation of 6 parking areas. • GDEP/DIPA 3048/162/05.08.2020, Adaptation to the requirements of JMD 1915/2018 (Government Gazette B' 304). • Decision of GDEP/DIPA under Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act implementing Article 2, para. 8a, of Law 4014/2011, as in force, for the

			extension of the period of validity of the AEPOs for the Concession project "Central Greece Motorway (E65) from Thermopylae to Raches.
5	**Complete Stylida - Karavomylos Bypass**	The AEPO for the section is valid until 04-08-2027 (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA/28675/1671/01.08.2025)	**MAIN PROJECT** • JMD 100198/30.05.2006 Approval of Environmental Terms. • EYPE 172866/23.05.2014 Amendment and renewal of the Environmental Terms. • GDEP/DIPA 12757/10.03.2016 Amendment of the Environmental Terms. • GDEP/DIPA 85272/3419/27.11.2018: Amendment of Environmental Terms for the construction and operation of 6 parking areas. • GDEP/DIPA 3048/162/05.08.2020, Adaptation to the requirements of JMD 1915/2018 (Government Gazette B' 304). • Decision of GDEP/DIPA under Ref. No. YPEN/DIPA/28675/1671/01.08.2025. Declaratory Act implementing Article 2, para. 8a, of Law 4014/2011, as in force, for the extension of the period of validity of the AEPOs for the Concession project "Central Greece Motorway (E65) from Thermopylae to Raches. **ANCILLARY WORKS** • EYPE 121667/08.02.2010 environmental licensing of the toll stations at the locations of the Agia Marina – Stylida Interchange and the Stylida – Karavomylos Interchange. • GDEP/DIPA 77442/4790/07.08.2020, Approval of the Technical Environmental Study (TEPEM) for the snow-clearing station at the Agia Marina Interchange (Ch. 223+320).

4.1.2 E65: Lamia – Kalampaka Section

The following table presents, by section, the period of validity of the approved environmental terms for the Central Greece Motorway (E65), as well as the permits that have been issued:

S/N	Section	Validity of ET	ET Decisions Issued
1	**Lamia - Makrychori**	The Decision Approving Environmental Terms (AEPO) of the section is valid until 16-12-2030. (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA/19921/991/18.09.2020)	**MAIN PROJECT** • JMD Ref. No. JMD-AEPO 144504/18.11.2005, Approval of Environmental Terms. • Decision of the General Director of Environment, YPEKA, ref. no. 167266/01.04.2013 Amendment for the section Ch. 0+000 - Ch. 14+500 (excluding the Lamia Interchange). • MD 171820/04.04.2014. Amendment of Environmental Terms regarding the exploitation of quarry sites. • MD 173471/27.06.2014. Amendment for the sections Ch. 31+212 – Ch. 85+000 (excluding the section Ch. 47+313 – Ch. 51+483). • MD 147997/14.04.2015. Amendment for the section Ch. 47+313 – Ch. 51+483. • Decision of the General Director of Environment, YPEN, ref. no. 151991/16.12.2015. Extension of the period of validity of the Environmental Terms. • MD 24355/13.05.2016. Environmental licensing of the Anavra Interchange Ramp Toll Stations and the Sofades Mainline Toll Stations. • MD 61420/16.12.2016. Amendment for the section Ch. 14+500 – Ch. 31+212 and the Lamia Interchange (Ch. 5+500). • MD 17095/04.04.2017. Amendment regarding the execution of water utilisation works (boreholes) in the Prefectures of Fthiotida and Karditsa for the operational needs of the motorway • MD 21166/22.05.2017. Amendment regarding the incorporation of the permit for the execution of water utilisation works in the Prefectures of Fthiotida and Karditsa for the

			operational needs of the motorway • Decision of the General Director of Environmental Policy, YPEN, ref. 22199/23.11.2017. Environmental licensing of the Xyniada MSA and the Sofades MSA. • Decision of the General Director of Environmental Policy, YPEN, ref. 52131/22.12.2017 Update of the final design of the section Ch. 31+212 – Ch. 85+000 • YPEN/DIPA/67165/2283-07-06-2019 - Amendment of Environmental Terms regarding the environmental licensing of a borrow pit at the "Kalamaki" location, Agia Paraskevi, Municipality of Lamia. • Decision of the General Director of Environmental Policy, YPEN, ref. 27870/1460/31.03.2020 Amendment of Environmental Terms regarding the "Samolakas" construction site • Decision of the General Director of Environmental Policy, YPEN, 19921/991/18.09.2020 Amendment of Environmental Terms regarding the update of the final design in the sub-section Ch. 0+000 to Ch. 32+300. • Decision of the General Director of Environmental Policy, DIPA, ref. YPEN/DIPA 15910/1074/06.05.2022, Amendment of Environmental Terms regarding the update of flood protection works: a) of the hydraulic design of the road project (additional/supplementary hydraulic structures at various locations in the sections from Ch. 0+000 to Ch. 24+000 and from Ch. 32+000 to Ch. 61+000), b) of the final design of the road project alignment (realignment from Ch. 19+000 to Ch. 23+500). • Decision of the General Director of Environmental Policy, DIPA, ref. YPEN/DIPA 27738/1842/20.12.2022, Amendment of Environmental Terms with regard to the variations in the hydraulic design (additional/supplementary hydraulic technical works for flood protection in the sub-section from Ch. 61+056 to Ch. 85+000). • Ref. No. YPEN/DIPA/38901/2667/23.04.2023, Decision "Variations of the environmentally approved design in accordance with para. 1a of Article 6 of Law 4014/2011 (Government Gazette A' 209), as in force, for the construction of three

			additional technical works on branch AB of the Lamia Interchange (Ch. 5+900, E65 Motorway) and small-scale variations" **ANCILLARY WORKS** • Decision of the General Director of Environmental Policy, YPEN, ref. 5396/07-02-2017: Approval of the TEPEM for the installation and operation of the Traffic Management Centre within the Sofades OMC at approximately Ch. 69+700 of the E-65. • Decision of the General Director of Environmental Policy, YPEN, ref. 77444/4791/07.08.2020: Approval of the TEPEM for the Lianokladi OMC and Police building.
2	**Makrychori - Kalampaka**	The Decision Approving Environmental Terms (AEPO) of the section is valid until 16-12-2030. (Decision YPEN/GDEP/DIPA with Ref. No. YPEN/DIPA/83863/5738/18.09.2023)	**MAIN PROJECT** • JMD on the Approval of Environmental Terms (AET) 145521/18.11.2005. Approval of ET • Decision of the General Director of Environment, YPEKA, ref. no. 203583/04.12.2012. With regard to the construction of the C-C at Ch. 137+000. • Decision of the General Director of Environment, YPEKA, ref. no. 172041/26.11.2013. Amendment of the section Ch. 85+800 - Ch. 137+550 (excluding the sections Ch. 115+100 - Ch. 118+043 and Ch. 131+475 - Ch. 132+420). • Decision of GDEP/DIPA, Ref. No. 151991/16.12.2015. Extension of the period of validity. • MD 17095/04.04.2017. Amendment with regard to the execution of water utilisation works (boreholes) in the Prefectures of Fthiotida and Karditsa for the operational needs of the motorway. • MD 21166/22.05.2017. Amendment regarding the incorporation of the permit for the execution of water utilisation works in the Prefectures of Fthiotida and Karditsa for the operational needs of the motorway • Decision of the General Director of Environmental Policy, Ref. No. 52133/22.12.2017. Update of the final design.

			• GDEP/DIPA 95851/4000/21.12.2018. Amendment of the Environmental Terms and licensing of the Trikala MSA. • Decision GDEP/DIPA 76887/4751/05.08.2020 on the adaptation of the E-65 motorway to the requirements of JMD 1915/2018 (Government Gazette 304/B/2018). • Decision GDEP/DIPA 83863/5788/18.09.2023. Amendment of the AEPO for the Makrychori-Kalampaka section (JMD 145521/18.11.2005) with regard to the regulation works on sections of the Kalentzis and Pamisos rivers, collector channels and associated works - Regulation, Maintenance and Ditch Cleaning Works. **ANCILLARY WORKS** • Decision of G.D.E.P./DIPA with Ref. No. YPEN/DIPA 16421/912/27.02.2025, approval of the TEPEM for the Kalampaka Police Station at approximately Ch. 135+900 of the E65 Central Greece Motorway, with regard to the addition of a fuel station for the needs of the Hellenic Police vehicles
3	**Kalampaka - Egnatia**	The Decision Approving Environmental Terms (AEPO) of the section is valid until 21/05/2028. (Decision YPEN/GDEP/DIPA with Ref. No. 9728/21-05-2018)	• JMD 147014/18.11.2005. Approval of ET • JMD 151991/16-12-2015 Extension of the period of validity of the ET. • GDEP/DIPA 9728/21.05.2018 Approval of new ET due to modified design, repealing JMDs 147014/18.11.2005 and 151991/16-12-2015.

4.2 Submissions

First half of 2026

For the **PATHE Motorway, Skarfeia – Raches Section**, no environmental studies concerning the Operation & Maintenance of the Concession Project were submitted by the Concessionaire in the first half of 2026.

For the **E65 Motorway**, the following environmental studies were submitted by the Concessionaire during the reporting period (first half of 2026):

- Submission of the TEPEM for the Snow Clearance Station in the area of the Xyniada Interchange of the E65 Motorway, Lamia - Makrychori section
  [Concessionaire to EYDE/KSESP with Ref. No. 25017/04.05.2026 and EYDE/KSESP to GDEP/DIPA with Ref. No. F9.18/86453/29.05.2026].

4.3 Pending Issues

4.3.1 PATHE: Skarfeia – Raches Section

All environmental studies submitted for the PATHE Motorway, Skarfeia – Raches Section, have been approved and the issuance of the ET has been completed.

4.3.2 E65: Lamia – Kalampaka Section

The following table presents the environmental studies that have been submitted for the E-65 Motorway, Lamia – Kalampaka Section, for which the issuance of the ET has not been completed.

S/N	Section	Pending Issues	Submissions	Remarks
1	**Lamia - Makrychori**	Submission of the TEPEM for the Snow Clearance Station in the area of the Xyniada Interchange of the E65 Motorway, Lamia - Makrychori section	• Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 25017/04.05.2026 • Submission by EYDE/KSESP to G.D.E.P./DIPA with Ref. No. F9.18/86453/29.05.2026.	**Approval by DIPA is pending**
2	**E65 - Section S2:** Makrychori – Kalampaka Section, sub-section Ch. 88+237 – Ch. 89+919.	Submission of an Environmental Impact Assessment for the amendment of JMD-AEPO 145521/18-11-2005, as amended and in force, with regard to the required flood protection works along the Central Greece Motorway.	• Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 20800/29.10.2018. • Submission by EYDE/KSESP to G.D.E.P./DIPA with Ref. No. F1/7986/31.10.2018.	**Approval by DIPA is pending**
3	**E65 - Section S2:** Makrychori – Kalampaka Section	EIA for the amendment of the Decision Approving Environmental Terms (AEPO) of the E65 for the Makrychori-Kalampaka section (JMD 145521/18.11.2005) with regard to the regulation works on the Enipeas river.	• Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 23653/23.09.2023. • Submission by EYDE/KSESP to G.D.E.P./DIPA with Ref. No. F9.18/56916/26.02.2024	**Approval by DIPA is pending**
4	**E65 - Section S3:** Kalampaka - Egnatia Section	TEPEM for the Karpero OMC (at Ch. 162+000-162+100)	• Submission by Kentriki Odos S.A. to EYDE/KSESP with Ref. No. 24693/31.07.2025. • Submission by EYDE/KSESP to G.D.E.P./DIPA with Ref. No. F9.18/131768/06.08.2025.	**Approval by DIPA is pending**

5.SENSITIVE AREAS OF THE PROJECT

The following table lists the nature protection areas through which the motorway passes or to which it is adjacent.

No.	Section	Natura 2000 Site
1	Skarfeia – Thermopylae	• Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
2	Thermopylae - Spercheios (excluding the bridge under construction by ERGOSE)	• Spercheios Valley and Estuary – Maliakos Gulf (GR2440002) • Lower Course and Estuary of the Spercheios River (GR2440005)
3	Spercheios - Agia Paraskevi Interchange	• Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
4	Agia Paraskevi Interchange - Agia Marina Interchange	• Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
5	Lamia - Makrychori	• Spercheios Valley and Estuary – Maliakos Gulf (GR2440002)
6	Makrychori - Kalampaka	• Antichasia Mountains & Meteora (GR1440005) • Antichasia Mountains & Meteora – Melissotrypa Cave (GR1440003)



6. AIR POLLUTION

The approved environmental terms do not provide for the implementation of an air quality monitoring programme on the PATHE section (Skarfeia–Raches).

In accordance with the environmental terms and the relevant approvals, an Air Pollution Monitoring Station was installed on the Makrychori – Kalampaka section of the E65 Motorway. The station is installed in the Sofades Geographical Unit, at the entrance to the adjacent Motorway Service Area. The station was put into trial operation on 15/03/2019.

For 2025, the air pollution monitoring programme was implemented by means of the above air pollution station, which operates on a 24-hour basis. The air pollution report was submitted by the Concessionaire to the competent authorities (DKAPA Directorate/YPEN, receipt ref. no. 46585/825-27.04.26; EYDE/D17, receipt ref. no. 65681-27.04.26; and EYDE/KSESP, receipt ref. no. 65748-27.04.26). A similar report will also be prepared and submitted for 2026.

For the measurement of pollutants, the station has been equipped with analysers approved in accordance with national legislation (Ministerial Decision H.P. 14122/549/E.103/2011 (Government Gazette 488/B/30.3.2011) Measures to improve air quality, in compliance with the provisions of Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 "on ambient air quality and cleaner air for Europe"). Specifically, for every 24-hour period, the following are recorded at each station:

1. The pollutants PM_{10}, $PM_{2.5}$, CO, NO, NO_2, NO_x, SO_2, C_6H_6 (Benzene)
2. The meteorological conditions at each installation site.

Pollutants are measured continuously throughout the day. The data logging system installed at each station and connected to the analysers calculates the average primary pollution values every five minutes. These measurements are transmitted via a fibre-optic network to the central computer of the air pollution monitoring system, where they are stored. At the end of each month, the measurements are corrected on the network's central computer. The corrections include the calibration results and the zero and drift corrections of the analysers. Following the corrections, the hourly, eight-hour and 24-hour average values of the pollutants (NO_2, CO, SO2, Benzene, Particulate Matter PM_{10} and $PM_{2.5}$) are calculated and stored. For 2025, the recordings of the measured pollutants were as follows:

Particulate Matter PM_{10}

The Limit in force since 01/01/2005 for PM_{10} particles is 50 μg/m³ as a daily average value and must not be exceeded more than 35 times per year. In addition, the annual average value must not exceed 40 μg/m³.

- **The value of 50 μg/m³ was not exceeded >35 times per year.**
- **The average value of 40 μg/m³ was not exceeded.**

Particulate Matter $PM_{2.5}$

For particulate matter $PM_{2.5}$, the annual average limit value in force since 01/01/2015 is 25 μg/m³.

- **The average value of 25 μg/m³ was not exceeded.**

NO_2

The Limit in force since 01/01/2010 is 200 μg/m³ as an hourly average value and must not be exceeded more than 18 times per year. In addition, the annual average value must not exceed 40 μg/m³.

- **The value of 200 μg/m³ was not exceeded > 18 times per year.**
- **The annual average value of 40 μg/m³ was not exceeded.**

CO

The limit in force since 01/01/2005 is 10 mg/m³ (maximum daily eight-hour value).

- **The maximum daily eight-hour value of 10 mg/m³ was not exceeded.**

SO_2



The Limit in force since 01/01/2010 is 350 μg/m³ as an hourly average value and must not be exceeded more than 24 times per year. In addition, the daily average value is 125 μg/m³, which must not be exceeded more than 3 times per year.

- **The maximum hourly average value (350 μg/m³) was not exceeded >24 times per year.**
- **The daily average value of 125 μg/m³ was not exceeded >3 times per year.**

Benzene

The limit in force since 01/01/2010 is 5 μg/m³ as an annual average value.

- **The annual average value (5 μg/m³) was not exceeded.**

⇨ **Gaseous Pollutant Monitoring Programme - Mobile Measurements**

The monitoring programme was carried out at two locations (Trikala MSA & Trikala Toll Station) and had a total duration of 8 weeks. In addition, an analysis and assessment of the dispersion of the pollutants generated was carried out using a specialised model which provides a range of computational solutions for air pollution. The traffic data loaded into the model were obtained from the Kentriki Odos loops near the measurement points. The two mobile measurement points were entered into the model, and its results for the whole of 2025 were compared with the results of the mobile measurements for the pollutants PM10, NO2, O3, CO and BTEX. The results of the measurements and of the model were found to be in full agreement.

7. NOISE AND TRAFFIC LOAD

In 2025, the 24-hour acoustic measurements carried out under the monitoring programme were as follows:

- **9 24-hour** acoustic measurements on the PATHE Motorway, **Skarfeia - Raches section**
- **10 24-hour** acoustic measurements on the E65 Motorway, **Lamia - Kalampaka section**

In total, **19 24-hour** acoustic measurements were carried out, and the evaluation of the results of the 24-hour acoustic measurements for 2025 shows that:

A. "Skarfeia-Raches" Section

On this section, across all 9 24-hour acoustic measurements, there is **NO exceedance whatsoever** and no measures are required.



B. "Lamia - Kalampaka" Section

On this section, across all 10 24-hour acoustic measurements, there is **NO exceedance whatsoever** and no measures are required.

The above measurements were carried out in accordance with the specifications and requirements of the legislation in force. Specialised scientific equipment was used to carry them out, complying with all international standards and directives laid down by European and Greek legislation. For 2025, the road traffic noise (RTN) monitoring programme submitted to the DKAPA Directorate/YPEN and approved under ref. no. YPEN/DKAPA/88337/1584/02.09.2025.

The results of the noise measurements and of the road traffic volume recordings, together with the measurement point, date and time period, the prevailing meteorological conditions, and the details and full name of the person responsible for the measurement, were recorded in a results sheet. Should systematic exceedances of the applicable road traffic noise limit be recorded, the body responsible for the construction and operation of the project is obliged to take appropriate measures immediately to eliminate the exceedances.

Before each 24-hour acoustic measurement, the instruments were calibrated using a special calibration device (acoustical calibrator) so as to monitor the reliability of the results throughout the recording of the acoustic environment.



For all measurement locations, the exact location and the exact period and day of the measurement are stated. It should be noted that the measurements were carried out in the absence of rain and strong wind, while under the usual conditions of light wind with a speed < 3 m/sec, a special microphone windscreen was always used. No acoustic recordings were carried out where other sources of noise pollution were identified in operation in the immediate vicinity of each recording location, e.g. gatherings of residents or road or building construction works, nor when traffic flow was not typical (e.g. weekends or public holidays) or normal road traffic had been interrupted or disrupted by an incidental event such as a road accident, etc.

Each 24-hour measurement recorded:

- the percentile indices L1, L10, L50, L95, L99, as well as the maximum (Lmax) and minimum values (Lmin),
- the road traffic noise level L_{10}(18h) and the equivalent continuous sound level L_{Aeq} (08:00–20:00),
- the equivalent continuous sound level LAeq(24h) and, finally,
- the indicators Lden, Lday, Levening and Lnight, as well as Ld-e, of the current legislation, in accordance with Joint Ministerial Decision (JMD) ref. 211773/2012 (Government Gazette 1367/B/27-4-2012).

The road traffic noise monitoring programme for 2025 has been completed. A similar programme will be implemented for 2026 and is expected to be completed within the year (recording of 24-hour measurements at selected locations), whereupon it will be submitted to the DKAPA Directorate/YPEN for approval.

Finally, it is noted that traffic volume is monitored daily on both the PATHE motorway, "Skarfeia – Raches" section, and the Central Greece Motorway (E65), "Lamia – Kalampaka" section, in terms of passages through all toll stations, and monthly reports are submitted. For 2025, the Annual Average Daily Traffic (AADT) was calculated for the PATHE motorway, "Skarfeia – Raches" section, at 13,047 passages in both directions, while for the Central Greece Motorway (E65), "Lamia – Kalampaka" section, it was calculated at 4,033 passages in both directions.

8. WASTE MANAGEMENT

8.1 Liquid waste

A comprehensive Environmental Management Plan has been drawn up and is being implemented, which includes the procedure for managing hazardous liquid waste in accordance with the environmental terms and the applicable legislation, while subcontractors are required to provide evidence of proper management. A relevant file has been set up containing agreements and waste receipt notes from licensed waste mineral oil management companies.

For hazardous liquid waste (engine, gearbox and lubricating oils, etc.) arising from the operation and maintenance of the motorway, the concession company follows all procedures provided for by the applicable legislation and cooperates with environmentally licensed waste management operators, and the quantities of such waste and the manner of their delivery to the respective approved Alternative Management System are recorded.

8.2 Solid waste

A Subcontractor has been engaged for the cleaning and collection of solid waste from the motorway, which is transported to appropriately licensed sites.

For hazardous solid waste arising from the operation and maintenance of the motorway, all procedures provided for by the applicable legislation are followed, and there is cooperation with environmentally licensed waste management operators.



Furthermore, fluorescent tubes and other mercury-containing waste, lead batteries, tyres collected from the motorway, iron and steel, plastic, animal-tissue waste (dead animals), plant-tissue waste and refuse constitute the waste generated by the operation and maintenance of the motorway, for which the quantities and the manner of their delivery to the respective approved Alternative Management System are recorded.

In addition, as part of its corporate social responsibility, ODOS KENTRIKIS ELLADOS S.A. has entered into agreements with companies of the Alternative Management System and recycles paper, plastic, batteries, used/damaged electrical and electronic equipment and toner. Furthermore, ODOS KENTRIKIS ELLADOS S.A. has an Environmental Management System certified to ISO 14001:2015.







Finally, it is noted that, as part of Environmental Monitoring, site inspections are carried out at locations where maintenance works are performed and the corresponding checklist is completed. Based on these inspections, in the event of non-compliance with the requirements, instructions (corresponding actions) are issued on how to achieve compliance. The implementation of corrective actions is verified through new site inspections based on the checklist.

8.3Waste Producer Report – Electronic Waste Register (EWR)

Pursuant to Article 42 of Law 4042/2012 (Government Gazette 24/A/13.02.2012), as amended by Article 157(1) of Law 4389/2016 (Government Gazette 94/A/27.05.2016), and JMD 1/1 (Government Gazette 1/B/04.01.2017), the Electronic Waste Register was established, while JMD ref. 43942/4026 (Government Gazette B 2992/19.09.2016) designates as obliged to register and make entries electronically every organisation or business whose facilities generate waste and fall within the scope of Chapter A of Law 4014/2011 (A 209).

ODOS KENTRIKIS ELLADOS S.A. has registered with the Electronic Waste Register (Reg. No. 3959), as it falls within the scope of the provisions of Law 4014/2011, since, pursuant to Decision ref. No. DIPA/oik. 37674/2016 (Government Gazette 2471/B/10.08.2016), motorways are classified among the projects of Group 1 (Land and air transport projects) – Road construction projects, Serial No. 1, Subcategory A1.

For 2025, the concession company submitted to the Electronic Waste Register (HMA) the relevant waste producer report separately for each JMD approving the environmental terms (JMD-AEPO) of the Concession Project. For 2026, the procedure is expected to be completed within the prescribed deadlines.

For all previous years (prior to the launch of the HMA), ODOS KENTRIKIS ELLADOS S.A. prepared and submitted the corresponding waste producer reports in accordance with the provisions of JMD 13588/725/06 and on the basis of Law 2939/2001 (and its amendment, Law 3854/2010).

9. CLEANING AND MAINTENANCE

The cleaning and maintenance works carried out during the first half of 2026, for which compliance with the Environmental Terms was checked, are as follows

- Cutting and maintenance of vegetation.
- Cleaning and maintenance of manholes and culverts
- Removal of advertising signs.
- Sweeping.
- Cleaning and washing of parking areas.
- Replacement of Bins.
- Replacement of metal crash barriers.
- Repair of metal safety barriers.
- Repairs of fencing damaged in accidents.
- Rodent control and inspection of tunnel drainage channels.







For all of the above works, monthly inspections are carried out to ensure compliance with the ETs, while the corresponding Reports include the check lists and the corresponding tables per JMD.

10. ACCIDENTS – ACCIDENTAL POLLUTION – ACTION PLAN

An Emergency Action Plan has been drawn up, describing measures for the timely collection and removal of hazardous substances following an incident on the motorway, with the aim of preventing pollution of receiving waters, the soil or the wider environment along the entire motorway. The Plan is an annex to the Policing and Firefighting Agreement concluded by the Concessionaire with the Ministry of the Interior, the Police and the Fire Service, and includes all the measures to be taken and the required equipment to be used by the Operator in the event of an accident involving a spill of non-biodegradable substances.

It is emphasised that, in the management of incidents involving hazardous loads, coordination is carried out entirely by the competent units of the Fire Service and the Traffic Police. The Operator's role is auxiliary, focusing on traffic management (signage, closures, diversions) as instructed by the competent authorities, the restoration of the road surface (cleaning, removal of obstacles, etc.) and of infrastructure (repair of damage, barriers, etc.), and the reopening of the road to traffic once the incident has ended.

The primary and principal tool for dealing with accidental spills that pose an immediate risk of pollution to surface waters and the soil is the use of absorbent materials such as sand or sawdust, or of special geotextile, immediately after the release of the hazardous load. Such materials are readily available from the Operator, the patrol teams and the maintenance contractor, enabling immediate intervention.

The decontamination process, as well as the transport and final management of the contaminated absorbent materials and of the hazardous waste resulting from such an incident, will be carried out in accordance with the applicable legislation by appropriately licensed

decontamination, transport and hazardous waste management companies, with the aim of dealing with incidents on the motorway in a timely manner

11. SPECIAL TERMS (E.G. TANKS, RUNOFF MANAGEMENT)

- Snow Clearance Stations

On the PATHE motorway, "SKARFEIA – RACHES" SECTION, there are 3 snow clearance stations in total. The installed and operational stations are located in the areas of Agia Triada, Agia Marina and Stylida.
On the Central Greece Motorway (E65), "LAMIA – KALAMBAKA" section, 3 snow clearance stations are planned. The installed and operational stations are located in the areas of Xyniada and Sofades, while the Trikala station has not yet been constructed.

- Visual intrusion from signs

All advertising signs and billboards located within the concession boundary have been removed. Regular inspections are carried out along the entire length of the motorways, and any advertising signs and billboards identified within the expropriation boundary are removed.

- Tunnel fire safety.

There is cooperation with the Fire Service, and preparedness exercises are carried out under conditions appropriate to a "Large-Scale" incident, in cooperation with the Fire Service, the Motorway Traffic Police and the National Emergency Medical Service (EKAV). No preparedness exercises were carried out in the first half of 2026.

- Pollution Control Units

It is noted that the temporary retention tanks for contaminated runoff on the "Stylida – Karavomylos Overall Bypass" section have been constructed in accordance with ET d-13 of JMD 100198/30.05.2006.

It is noted that, upon completion of the public works contracts on the PATHE and E65 sections, the pollutant retention tanks provided for by JMD-AEPO 146113/12.07.2005 for the "Skarfeia – Thermopylae" section were constructed and handed over to the Concessionaire.

Similarly, pollutant retention tanks have been constructed on the E65 in compliance with ETs 29 and 48 of JMD 144504/18.11.2005.

It is noted that the Concessionaire has designed and has in place a pollution response plan to be implemented in the event of accidental pollution, which will include the use of the said tanks in application of the ETs and its contractual obligations.

- Water Quality

As part of the water monitoring programme for 2025, a total of 17 samplings were carried out in one cycle for the E65 Motorway and for the Spercheios section of the PATHE. The 2026 samplings will be carried out in the second half of the year.

12. INSPECTION AND MAINTENANCE OF HYDRAULIC WORKS

Hydraulic works are inspected and maintained to ensure the unobstructed flow of surface water bodies (e.g. rivers, streams, torrents) at the points where they cross or are associated with the alignment, through the cleaning and maintenance of the existing structures. In addition, the inlets and outlets of transverse culverts are cleared of vegetation, litter and other debris to allow wildlife to pass through unobstructed. The operational condition of all hydraulic structures is monitored through inspections for erosion, settlement, blockage or signs of failure, and their adequacy and condition are assessed.

13. PLANTING – GREEN AREA MAINTENANCE

A contract has been concluded with a Subcontractor for the maintenance and management of vegetation and planting.

14. CONCESSIONAIRE'S ENVIRONMENTAL DEPARTMENT

ODOS KENTRIKIS ELLADOS S.A. is the "Concessionaire" for the Project "Central Greece Motorway (E65)" under the Concession Agreement.

Under the Operation & Maintenance Agreement dated 5/3/2021, the Concessionaire has assigned to the Operator, and the Operator has assumed, all of the Concessionaire's obligations, rights, risks and liabilities under the Concession Agreement in respect of the operation and maintenance of the Concession Project, on a back-to-back basis.

Under the Agreement dated 30/1/2025, the Operator subcontracted part of the Operation and Maintenance services for the Motorways to a Maintenance Subcontractor.

In accordance with the provisions of the Concession Agreement and the Operation and Maintenance Agreement, the Concessionaire retains, among others, the following responsibilities:

- It monitors and supervises compliance with the Environmental Requirements in accordance with the provisions of the Concession Agreement

- It submits reports and updates to the State in accordance with the provisions of the Concession Agreement.

The obligations regarding environmental protection during the Operation & Maintenance activities of the motorways are set out in Art. 11 of the Concession Agreement, in Arts. 2.3 and 2.6 of the Special Specifications (ESY) [?] and in Annex A of the ESY (Environmental Permitting of the Project).

The Environmental Terms Approval Decisions (AEPO) are separate for each section of the motorways and are specific to the needs of each area, as well as to the environmental impacts of the O&M of the motorway.

To ensure effective compliance with the above, an Environmental Management System designed to cover these specific requirements is being implemented. Furthermore, maintaining the relevant certification under the corresponding international standard ISO 14001 makes it possible for the above environmental terms to remain in force for a longer period.

This System, in synergy with the Concessionaire's correspondingly certified Environmental Management System, will cover the entire Concession Project horizontally.

To implement the above, the Operator, the Maintenance Subcontractor and the Concessionaire each have an Environmental Department staffed with specialised personnel responsible for monitoring and ensuring compliance with the Environmental Terms (ET) along the entire length of the Motorways. They also work with a specialist consultant to form a team of scientists covering the full spectrum of environmental disciplines. The scientific team consists of: a Civil Engineer - Transport Engineer - Acoustician, an Environmental Scientist - Spatial Planner and an Environmental Scientist – Chemist - Acoustician, so as to fully meet the needs for supervising the ET of the road project.

15. REPORTS (SIX-MONTHLY – ANNUAL SUBMISSIONS)

For 2025, the 1st Semi-Annual Environmental Monitoring Report for the Concession Project under study was prepared and submitted by the Concessionaire to the Supervising Authorities and the General Directorate of Environmental Policy / Ministry of Environment and Energy (GDEP/YPEN) (Receipt Ref. No. D17 132276-07.08.25, KSESP Receipt Ref. No.: 132331-07.08.25 & DIPA Receipt Ref. No.: 88364/5646-07.08.25), as was the 2025 Annual Environmental Monitoring Report for the Concession Project under study, which was submitted by the Concessionaire to the Supervising Authorities and GDEP/YPEN (Receipt Ref. No. D17 56843-

07.04.26, KSESP Receipt Ref. No.: 56815-07.04.26 & DIPA Receipt Ref. No.: 40098/2669-07.04.26).

16.MONTHLY MONITORING – CHECKLISTS

Based on the Environmental Monitoring and Control Programme and the Environmental Management System, "Environmental Terms Compliance Checklists" are drawn up, setting out the manner and methodology of the actions required to ensure the implementation of the Environmental Terms.



The environmental officers, in cooperation with the project engineers, carry out regular (monthly) inspections and complete the checklists, i.e. the implementation of the "Environmental Monitoring

and Control Programme". They also issue the necessary instructions or guidance, based on the Environmental Monitoring and Control Programme, for any environmental issue that arises.

After each regular (monthly) inspection, the corresponding checklist is completed, recording any deviations from the implementation of the environmental terms identified during the site inspections. The proposed corrective actions are recorded in the same checklist. The checklists are sent to the operating company so that it can take all necessary actions and appropriate measures to comply with environmental legislation and the project's environmental terms. At the immediately following re-inspection, it is verified whether all necessary measures have been taken and the proposed corrective actions followed, and the corresponding fields in the monthly checklist are completed.

The Environmental Management System (EMS) implemented consists of the Manual, the Procedures and the Work Instructions relating to the environment and compliance with the project's environmental requirements. The environmental management manual, procedures and instructions are applied uniformly across the entire project and are continuously developed to meet the needs of the project.

17. INSPECTIONS BY AUTHORITIES – FINES

For the reporting period (1st half of 2026), no environmental degradation problems arising from the operation and maintenance of the motorway have been identified, and no fines have been imposed on Odos Kentrikis Elladas S.A.

18. CERTIFICATIONS

ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor have each separately developed and implement an Integrated Management System (IMS), resulting from the integration of the Quality, Environmental and Health & Safety Systems implemented by each company. The aim of both IMSs is the more effective management of quality, environmental and H&S issues by eliminating overlapping procedures and controls.

In addition, ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor, recognising the need for the uninterrupted operation of the motorways under their responsibility, each separately designed a Business Continuity Plan on which they based the implementation of their own Business Continuity Management System (BCMS). In 2020, the BCMS was certified to the international standard ISO 22301:2012, making it the first Concession Company to obtain this certification. In February 2022, the BCMSs of NEA ODOS S.A. and the Operator were certified to the latest version of the standard ISO 22301:2019.

For ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor, the annual certification of the Business Continuity Management System to **ISO 22301:2019** was carried out in February 2026 by the certification body Bureau Veritas.

In addition, for ODOS KENTRIKIS ELLADOS S.A., the annual audit of the Compliance Management System to ISO 37301:2021 was carried out in March 2026 by the certification body Bureau Veritas.

Furthermore, for ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor, the annual audit of the Quality Management System to **ISO 9001:2015**, the Health & Safety Management System to **ISO 45001:2018**, and the Environmental Management System to **ISO 14001:2015** was carried out in May 2026 by the certification body Bureau Veritas.

In addition, in 2015 ODOS KENTRIKIS ELLADOS S.A. designed and implemented a Road Traffic Safety Management System, which was certified to the international standard ISO 39001:2012, a milestone in safe and effective fleet management that demonstrates its commitment to applying safe practices on the motorway. From 2021 until March 2025 the system was implemented by the Operator, and thereafter by the Maintenance Subcontractor.

For the Maintenance Subcontractor, the annual Certification audit of the Road Traffic Safety Management System to **ISO 39001:2012** was carried out in May 2026 by the Certification Body Bureau Veritas.

In summary, ODOS KENTRIKIS ELLADOS S.A., the Operator and the Maintenance Subcontractor are certified to the following Management System Standards:

ODOS KENTRIKIS ELLADOS S.A.

- ISO 37301 (Compliance Management System).
- ISO 9001 (Quality Management System).
- ISO 45001 (Health & Safety Management System).
- ISO 14001 (Environmental Management System).
- ISO 22301 (Business Continuity Management System).

OPERATOR

- ISO 9001 (Quality Management System).
- ISO 45001 (Health & Safety Management System).
- ISO 14001 (Environmental Management System).
- ISO 22301 (Business Continuity Management System).

MAINTENANCE SUBCONTRACTOR

- ISO 9001 (Quality Management System).
- ISO 45001 (Health & Safety Management System).
- ISO 14001 (Environmental Management System).
- ISO 22301 (Business Continuity Management System).
- ISO 39001 (Road Traffic Safety Management System).

Following the above audits, the independent bodies recommended the continuation of the Certifications for all standards for at least one year, until the next scheduled annual audits are carried out.





19. SECURING OF EXPENDITURE

The required percentage of the total operation and maintenance budget of the motorway needed for full compliance with the Environmental Terms and restrictions of the respective Joint Ministerial Decisions (JMD) – AEPO has been secured as a matter of priority. Expenditure on environmental protection works is reported in the annual progress reports on compliance with the Environmental Terms.

20. CORPORATE SOCIAL RESPONSIBILITY

ODOS KENTRIKIS ELLADOS S.A. prepares a Corporate Responsibility Report in accordance with the Global Reporting Initiative (GRI) standard, The GRI Standards, and meets the criteria of the Core Option (in accordance: Core option). The Report covers all the key and material topics that the company has identified and focuses on, including environmental topics.

The Reports are prepared annually and are based on the 4 pillars of Corporate Responsibility for Operation & Maintenance activities:

- Road Safety and Service Quality
- Human Resources
- Care for the Environment
- Contribution to Society

The Corporate Responsibility Report is posted at: http:/www.kentrikiodos.gr.

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20. ANNEXES

Annex I

