

+GRI Standards



GRI 2: General Disclosures 20

| Standard | Disclosures & Requirements | Cross - reference & Data | GRI sector standard | CSRD (ESRS interoperability/ assurance) | GRI assurance |
|----------|--|--|---------------------------|--|------------------|
| 2-1 | Organizational Details | Annual Financial Report 2024 (b) p.15, p. 314, p. 407- 409 | - | - | ✓ |
| 2-2 | Entities included in the organization's sustainability reporting | Annual Financial Report 2024 (b) p. 116, p. 407- 409 | - | ESRS 2-BP-1-5-(a) and ESRS 2-BP-1-5-(b)-(i) | ~ |
| 2-3 | Reporting period, frequency and contact Point | January – December 2024 Annual edition Date of publication: 29/07/2025 Group Health, Safety, Environment & Sustainable Development Division E-mail: sustainability@helleniq.gr Tel: +30 210 630 2558 | - | ESRS 2-BP-1-5-(a) | ~ |
| 2-4 | Restatements of information | Does not disclose any revised comparative figures. | | ESRS 2-BP-2-13-(a)-(b) and ESRS 2-BP-2-14-(a)- (b) | ✓ |
| 2-5 | External assurance | Annual Financial Report 2024 Description p. 412-424 The external assurance process involved all Divisions and subsidiaries of the Group that published information, as well as senior Group executives. The Report has been signed by the CEO. | | CSRD p. 55-57 | ~ |
| 2-6 | Activities, value chain and other business relationships | Annual Financial Report 2024 (b) p. 34, p. 125-126, 133) | | ESRS 2 SBM-1-40-(a)-(i)- (ii), (b), (c), ESRS 2 SBM-1-42-(c) | ~ |



2-7 Employees

Annual Financial Report 2024



Group – Total staff – Breakdown by gender and labor contract type*

| CONTRACTTYPE | М | F | TOTAL |
|----------------|-------|-----|-------|
| Upstream | 2,883 | 751 | 3,634 |
| Fixed contract | 80 | 20 | 100 |
| Full-Time | 2,962 | 771 | 3,733 |
| Part-Time | 1 | 0 | 1 |

^{*} On 31/12/2024

Normally there are no seasonal workers, apart from EKO and KALYPSO, as there are seasonal staff changes with fixed term contracts at airport facilities, the fuel facilities in Aspropyrgos and West Thessaloniki and at fuel stations. The average of seasonal workers in 2024 was 100.

The self-employed employees of the Group are 91 (89 in ASPROFOS, 1 in EKO CYPRUS and 1 in OKTA).

Breakdown by gender and labor contract type per company

| CONTRACTTYPE | HELLENIQ PETROLEUM S.A | | | .ENiQ :RGY |
|----------------|---------------------------|-----|----|---------------|
| | M | F | M | F |
| Indefinite | 1,990 | 240 | 40 | 23 |
| Fixed contract | 0 | 0 | 2 | 0 |
| Full-Time | 1,990 | 240 | 42 | 23 |
| Part-time | 0 | 0 | 0 | 0 |

| CONTRACTTYPE | ЕКО | | | /PSO S.A. |
|----------------|-----|-----|---|--------------|
| | M | F | M | F |
| Indefinite | 292 | 154 | 3 | 4 |
| Fixed contract | 20 | 3 | 0 | 0 |
| Full-Time | 312 | 157 | 3 | 4 |
| Part-time | 0 | 0 | 0 | 0 |

ESRS 2 SBM-1-(40)-(a)-(iii) ESRS S1S1-6)-(50)-(a)-(b)-(d)-(e), (51),(52)





| CONTRACTTYPE | VARDAX S.A. | | JUGOP | ETROL |
|----------------|-------------|---|-------|-------|
| | М | F | M | F |
| Indefinite | 0 | 2 | 59 | 43 |
| Fixed contract | 0 | 1 | 0 | 1 |
| Full-Time | 1 | 2 | 59 | 44 |
| Part-time | 0 | 0 | 0 | 0 |

| CONTRACTTYPE | EKO SERBIA | | EKO BU | ILGARIA |
|----------------|------------|----|--------|---------|
| | M | F | M | F |
| Indefinite | 23 | 28 | 32 | 37 |
| Fixed contract | 2 | 1 | 0 | 0 |
| Full-Time | 25 | 29 | 37 | 37 |
| Part-time | 0 | 0 | 1 | 0 |

| CONTRACTTYPE | EKO CYPRUS | | Ok | (TA |
|----------------|------------|----|-----|-----|
| | М | F | M | F |
| Indefinite | 51 | 30 | 140 | 48 |
| Fixed contract | 2 | 0 | 47 | 14 |
| Full-Time | 53 | 30 | 187 | 62 |
| Part-time | 0 | 0 | 0 | 0 |

| CONTRACTTYPE | ELPETBALKANIKI | | DIA | XON |
|----------------|----------------|---|-----|-----|
| | М | F | M | F |
| Indefinite | 0 | 0 | 99 | 15 |
| Fixed contract | 1 | 0 | 47 | 14 |
| Full-Time | 1 | 0 | 99 | 15 |
| Part-time | 0 | 0 | 0 | 0 |

| CONTRACTTYPE | ASPROFOS | | | .ENiQ EAM S.A. |
|----------------|----------|----|----|-------------------|
| | М | F | M | F |
| Indefinite | 69 | 48 | 11 | 9 |
| Fixed contract | 0 | 0 | 1 | 0 |
| Full-Time | 69 | 48 | 12 | 9 |
| Part-time | 0 | 0 | 0 | 0 |



| CONTRACTTYPE | HELLENIQ ENERGY CONSULTING | | | ENIQ DIGITAL |
|----------------|-------------------------------|----|----|-----------------|
| | М | F | M | F |
| Indefinite | 34 | 47 | 17 | 13 |
| Fixed contract | 3 | 1 | 1 | 0 |
| Full-Time | 37 | 48 | 18 | 13 |
| Part-time | 0 | 0 | 0 | 0 |

| CONTRACTTYPE | ELEPEFUTURE | | | .ENIQ .BLES S.A. |
|----------------|-------------|---|----|---------------------|
| | M | F | M | F |
| Indefinite | 5 | 2 | 14 | 5 |
| Fixed contract | 0 | 0 | 0 | 0 |
| Full-Time | 5 | 2 | 14 | 5 |
| Part-time | 0 | 0 | 1 | 0 |

| CONTRACTTYPE | HELLENIQ RENEWABLES WINDFARMS OF EVIAS S.A. | | WIND | ENEWABLES FARMS NNI S.A. |
|----------------|---|-----|------|--------------------------------|
| | М | F | M | F |
| Indefinite | 2 | 0 | 2 | 1 |
| Fixed contract | 0 | 20 | 0 | 0 |
| Full-Time | 312 | 157 | 2 | 1 |
| Part-time | 0 | 0 | 0 | 0 |

| CONTRACTTYPE | EKO AFRODITI | |
|----------------|--------------|---|
| | М | F |
| Indefinite | 0 | 2 |
| Fixed contract | 1 | 0 |
| Full-Time | 5 | 2 |
| Part-time | 0 | 0 |

| Group –Total employees per country of employment & gender | 3,734* |
|---|--------|
| Women - Greece | 567 |
| Men - Greece | 2,609 |
| Women - North Macedonia | 62 |
| Men - North Macedonia | 187 |
| Women - Serbia | 29 |
| Men – Serbia | 25 |
| Women - Cyprus | 30 |
| Men - Cyprus | 53 |
| Women - Bulgaria | 37 |
| Men - Bulgaria | 32 |
| Women - Montenegro | 44 |
| Men – Montenegro | 59 |

* On 31/12/2024



| 2-8 | Workers who are not employees | Annual Financial Report 2024 p.258 | - | ESRS S1-1-(7)- (55)-(56) | ~ |
|------|---|--|---|---|----------|
| 2-9 | Governance structure and composition | Annual Financial Report 2024 (b) p.80 (c) p.119 | - | ESRS 2 GOV-1- (21), (22)-(a), (23) | ✓ |
| 2-10 | Nomination and selection of the highest governance body | Annual Financial Report 2024 (b) p.90 | - | | ~ |
| 2-11 | Chair of the highest governance body | Annual Financial Report 2024 (b) p.80 | - | | ✓ |
| 2-12 | Role of the highest governance body in overseeing the management of impacts | Annual Financial Report 2024 p.73-90 | - | ESRS 2 GOV-1-22-(c) GOV-2-26-(a)- (b) SBM-2-45-(d) ESRS-G1-5-(a) | ~ |
| 2-13 | Delegation of responsibility for managing impacts | Annual Financial Report 2024 (b) p.119 | - | ESRS 2 GOV-1- (21), (22)-(a), (23) | ✓ |
| 2-14 | Role of the highest governance body in sustainability reporting | Annual Financial Report 2024 p.88 | - | ESRS 2 GOV-5-36 IRO-1-53-(d) | ~ |
| 2-15 | Conflicts of interest | Annual Financial Report 2024 p.79 | - | | ~ |



| 2-16 | Communication of critical concerns | Annual Financial Report 2024 p.120 | - | ESRS 2 GOV-2-(26)-(a) | ✓ |
|------|---|--|---|------------------------------------|----------|
| 2-17 | Collective knowledge of the highest governance body | Annual Financial Report 2024 (b) p. 77, p. 119) | - | ESRS 2 GOV-1- (23) | ✓ |
| 2-18 | Evaluation of the performance of the highest governance body | Annual Financial Report 2024 (b) p. 90 | - | | ~ |
| 2-19 | Remuneration policies | Annual Financial Report 2024 (b) p. 92 | - | ESRS 2 GOV-3-29-(a)- (b)-(c) | ✓ |
| 2-20 | Process to determine remuneration | Annual Financial Report 2024 (b) p. 92 The Remuneration Report for 2024 will be available via the corporate website www.helleniqenergy.gr and will be approved at the Annual General Meeting held on 19 June 2025. | - | ESRS 2 GOV-3-(29)-(e) | ~ |
| 2-21 | Annual total compensation ratio | Annual Financial Report 2024 (b) p. 263 The annual total compensation ratio within the Group is 23.09, reflecting a structured approach to compensation that aligns with performance, responsibilities, and market standards. This ratio underscores the Group's dedication to fostering a fair and competitive work environment, consistent with its core principles of equality and compliance with Greek, national, and EU regulations. The change in the annual total compensation ratio is 5.11. | - | ESRS S1 S1-16 §97 (b) to (c) | ~ |



| 2-21 | Annual total compensation ratio | The above figures represent the ratios in Greece, where the Group has significant employment with at least 50 employees representing at least 10% of total number of employees. The methodology for compile these data differs from the total remuneration ratio in ESRS S1-16. HELLENIQ ENERGY is committed to maintaining a transparent and equitable remuneration framework across its operations. The Group does not follow any kind of differentiation between men and women in the remuneration system. Remuneration is based on annual evaluations and follows the Greek, national and EU legislation on equal pay. | - | ESRS S1 S1-16 §97 (b) to (c) | ~ |
|------|--|--|---|--|----------|
| 2-22 | Statement on sustainable development strategy | Annual Financial Report 2024 (b) p. 128 | - | ESRS 2 GOV-3 §29 (e) | ✓ |
| 2-23 | Policy commitments | Annual Financial Report 2024 (b) p. 247, p. 266, p. 277 | - | ESRS S1 S1- (19)-(21)-(AR 14) ESRS S3 S3-1- (14)-(16)-(17)- (AR 11) ESRS S4 S4-1- (15)-16)-(17)- (AR 13) | ~ |
| 2-24 | Embedding policy commitments | Annual Financial Report 2024 (b) p. 120 At the same time, the Group is committed to implementing Management Systems and continuously improving its performance. The certifications of the Group's facilities, warehouses, fuel stations, in accordance with internationally recognized standards, are presented below (the original year of certification is indicated). | - | ESRS 2 GOV-2-26 (b) | ~ |



2-24 Embedding policy commitments

Valid certification type and first year of certification ISO 45001 ISO ISO /former ISO ISO ISO **ELOT** Facility 14001 **OHSAS** 50001 1429 9001 14064 17025* 18001 AIC 2011 2011 2021 2021 2004 2013 EIC 2011 2010 2021 2021 2009 TIC 2000 2021 2008 2013 2021 Polypropyl 2010 ene industrial 2003 2013 facility DIAXON 2021 2004 2004 2001 EKO SA's liquid (Aspropyrgos, fuel storage 2018 Corfu, & 2020 2022 2021 facilities Heraklion) 2018 EKO SA's Lubricant 1997 2003 2003 2022 2021 Production Unit EKO SA's aviation fuel 2001 2003 2003 2022 2021 stations at 20 airports Self-owned 2011 (2 fuel station fuel stations 2018 2020 2022 2021 (KALYPSO Aspropyrgos) 2018 KEASA) **EKO LPG** Storage and Distribution 2018 2018 2020 2022 2021 Units (Aspropyrgos & Kalochori) Group's HQ 2013 2013 2021 HELLENIQ UPSTREAM 2013 2013 2005 2005 2005 2021 2011 **ASPROFOS** 2015 2015 2015 2006 **EKO CYPRUS** HELLENIQ 2021 2021 2021 RENEWABLES **ELPEFUTURE** 2021 2021 2021 2015 2006 OKTA 2015 2015 Note: * Refers to refinery/facility laboratories

ESRS 2 GOV-2-26 (b)



| 2-25 | Processes to remediate negative impacts | Annual Financial Report 2024 (b) p. 248, p. 267, p. 277, p. 281 | - | ESRS S151-1 20 (c); ESRS S3 S3-1-16 (c) ESRS S4 S4-1 16 (c); S4-3-25 (a), (b) and (e) | ~ |
|------|---|--|---|---|----------|
| 2-26 | Mechanisms for seeking advice and raising concerns | Annual Financial Report 2024 (b) p. 194 | - | | ~ |
| 2-27 | Compliance with laws and regulations | Annual Financial Report 2024 (b) p. 264 | - | ESRS S1 S1-17 103 (c) to (d) and 104 (b); | ~ |
| 2-28 | Membership associations | Employees of the Group may, without any restriction, participate in trade unions and professional associations The Group, to better operate and implement its sustainability strategy, cooperates with its stakeholders and thus, participates in organizations, associations and bodies. The Group sponsors and/or participates in the governing bodies and committees of the organizations/ associations and regards as part of its sustainable development strategy its active participation in the following organizations: Sustainability and Corporate Responsibility Organizations: CONCAWE (scientific section of the European Refineries Organization FuelsEurope) Hellenic Federation of Enterprises (SEV) Council for Sustainable Development (The CEO holds the position of Chairman of the Council / participation in various committees & working groups) HFE's Committees on Environment and Health & Safety UN Global Compact - Network Hellas CSR Hellas Softone Global Sustain Hydrogen Europe Hellenic Wind Energy Association (HWEA) Hellenic Institute of Electrical Vehicles (HELIEV) (Secretary General of the Board of Directors) Hellenic Association of Photovoltaic Companies (HELAPCO) (member of the Board of Directors) Hellenic Association of Independent Power Producers (HAIPP) (member of the Board of Directors) | | 'Political engagement' is a sustainability matter for G1 covered by ESRS1AR16. | |



| 2-28 | Membership | Climate Governance Initiative Greece (CGI Greece) (founding member) | 'Political | |
|------|--------------|--|--|--|
| | associations | IFRS – Sustainability reference Group | engagement' is a sustainability matter for G1 | |
| | | Tax Issues Organizations: | covered by ESRS 1 AR 16 | |
| | | International Fiscal Association | | |
| | | HFE's Tax Affairs Committee | | |
| | | The American-Hellenic Chamber of Commerce's Tax Affairs Committee | | |
| | | Industry Organizations: | | |
| | | Hellenic Petroleum Products Marketing Companies Association (BoD Vice President / Participation in various committees) | | |
| | | European Fuel Manufacturers Association (EFMA) (Participation in various committees) | | |
| | | FuelsEurope (Participation as Chairman of the Legal Affairs Committee (LIG)) | | |
| | | Association of Greek Chemical Industries (Participates as a member of the Board of Directors) | | |
| | | eFuel Alliance (Participation in the bodies of the Alliance and member of the Board of Directors) | | |
| | | Union European Lubricants Industry (UEIL) (Member of the Sustainability Committee) | | |
| | | Gas Industry Advisory Committee (GIAC) (Member of the EMGF Committee) | | |
| | | Association of Exporters of Northern Greece (Participation as Secretary General of the Board) | | |
| | | SEV - Hellenic Federation of Enterprises (Member of the Board of Directors / Participation in various committees & working groups) | | |
| | | AmCham - American Chamber of Commerce (Member of the Board of Directors / Participation in various committees) | | |
| | | The Arab-Hellenic Chamber of Commerce and Development (Member of the Board of Directors) | | |
| | | Institute of Energy of Southeast Europe (IENE) (Participation as Chair of the Downstream Committee) | | |
| | | Hellenic Association for Energy Economics (Members with Access) | | |
| | | Association of Corporate Counsel (Member of the Organizing Committee of the Annual Conference in Greece) | | |
| | | Business Integrity Forum of the Hellenic Office of the Transparency International Organization (Member of the BoD). In cooperation with other major companies operating in Greece, they exchange knowledge and best practices to address corruption phenomena. | | |
| | | The German-Hellenic Chamber of Commerce and Industry (President of Energy Committee). | | |
| | | DIAXON | | |
| | | Association of Manufacturing Industries of the Rodopi Prefecture | | |
| | | Federation of Industries of Greece (SVE) | | |
| | | Hellenic Federation of Enterprises (SEV) | | |
| | | Association of the Greek Manufacturing of Materials & Packaging | | |



| 2-28 | Membership associations | Climate Governance Initiative Greece (CGI Greece) (founding member) IFRS – Sustainability reference Group | - | 'Political engagement' is a sustainability matter for G1 | ~ |
|------|----------------------------|---|---|--|---|
| | | Industry Organizations: | | covered by ESRS 1 AR 16 | |
| | | EKO CYPRUS | | | |
| | | Cyprus Chamber of Commerce - KEBE (Voluntary membership since 1954) | | | |
| | | Cyprus Employers & Industrialists Federation - OEB (Voluntary membership since 1960) | | | |
| | | KODAP - Cyprus strategic stocks, (Obligatory professional relation since 2006. Financed through a fee imposed by the Government on fuel sales). | | | |
| | | CYMEPA - Cyprus Marine Environment Protection Association (Voluntary membership since 1993) | | | |
| | | ОКТА | | | |
| | | Industry Organizations: | | | |
| | | ZEMAK – Energy Association (Holds a position on the BoD and provides funding) | | | |
| | | SIER (Union of Industry, Energy and Mining) - active member | | | |
| | | Professional Organizations: | | | |
| | | Council of the Institute for Accreditation (Membership is considered as strategic) | | | |
| | | Economic Chamber of the country (Participates at the BoD, patron membership) | | | |
| | | Energy Association of Economic Chamber (Hold the position of President) | | | |
| | | Foreign Investors Council within the Economic Chamber (Membership and active participation in projects) | | | |
| | | AmCham - American Chamber of Commerce | | | |
| | | Hellenic Business Association (Founding member) | | | |
| | | Environmental and Sustainability | | | |
| | | Organizations: | | | |
| | | Partnership for Clean Fuels and Vehicles (Membership) | | | |
| | | Institute for Standardization (ISRM) (Membership - active participation in the work of the Council and the committees at the Institute) | | | |
| | | Council of Bureau of Metrology (Membership is considered strategic) | | | |
| | | MZZPR (Macedonian Association for Occupational Safety) | | | |
| | | IMI Engineering Institution of North Macedonia (Membership, holds a position of vice president in the governance body) | | | |
| | | Organization of Employers (Member – active participation) | | | |
| | | Institute of Internal Auditors North Macedonia (Membership) | | | |
| | | | | | |
| | | | | | |



| 2-28 | Membership associations | EKO BULGARIA The Bulgarian Petrol & Gas Association (BPGA) – member and active participation The Hellenic Business Council of Bulgaria (HBCB) Bulgarian Assosciation of People Management (BAPM) – member EKO SERBIA Founding member of the UNKS Association (Association of Oil Companies in Serbia) among other key fuel retail chains and competitors. UNKS was founded in 2011. EKO Serbia participates in projects and committees and does not pay a substantial amount apart from membership. EKO Serbia considers this organization a strategic partner. In 2020 EKO Serbia Operations and Fuel Supply Director was elected UNKS President. Member of FIC (Foreign Investors Council) since EKO entered the country in 2002. Member of Chamber of Commerce and Industry of Serbia Global Compact Hellenic Business Association in Serbia JUGOPETROL Professional organizations: Montenegrin Foreign Investors Council (Membership) Montenegrin Employers' Federation (Membership) Montenegrio Business Alliance (Membership) Regional and Local Organizations: Union of Managerial Executives of Montenegro (Membership) Chamber of Commerce of Montenegro (Full membership) Standardization Institute of Montenegro (Membership) | 'Political engagement' is a sustainability matter for G1 covered by ESRS 1AR 16 | |
|------|-------------------------|---|---|--|
| | | | | |



| 2-29 | Approach to stakeholder engagement | Annual Financial Report 2024 (b) (p. 134, p. 251, p. 267-268. p. 277, p. 279) | - | ESRS 2 SBM-2-(45)- (a) i to (a) iv ESRS S1 S1-1-20 (b); S1-2-27 (e) and 28 ESRS S3 S3-1-16 (b); S3-2-21 (d) ESRS S4 S4-1-16 (b) S4-2-20 (d) and 21 | ~ |
|------|--|---|---|---|----------|
| 2-30 | Collective bargaining agreements | Annual Financial Report 2024 (b) (p. 258) | - | ESRS S1 S1-8-60-(a) | ✓ |



GRI 3: Material Topics 2024

| Standard | Disclosures & Requirements | Cross - reference & Data | GRI sector standard | CSRD (ESRS interoperability/ assurance) | GRI assurance |
|----------|--|--------------------------------------|---------------------------|--|------------------|
| 3-1 | Process to determine material topics | Annual Financial Report 2024 p. 140 | - | ESRS 2 BP-1-AR 1 (a); IRO-1-53 (b) ii to (b) iv | ✓ |
| 3-2 | List of material topics | Annual Financial Report 2024 p. 139 | - | ESRS 2 SBM-3-48 (a) and (g) | ✓ |

Climate change

| 3-3 | Management of material topic | Annual Financial Report 2024 (b) ESRS E1-Climate Change | 11.1.1 | ESRS 2 SBM-1§ 40 (e); SBM-3 §48 (c) i and (c) iv; MDR-P, MDR-A, MDR-M, and MDR-T; ESRS S1 S1-2-27; S1-4-39 and AR 40 (a); S1-5-47 (b) to (c); ESRS S2 S2-2-22; S2-4-33, AR 33 and AR 36 (a); S2-5-42 (b) to (c); ESRS S3 S3-2-21; S3-4-33, AR 31, AR 34 (a); S3-5-42 (b) to (c); ESRS S4 S4-2-20, S4-4-31, AR 30, and AR 33 (a); S4-5-41 (b) to (c) | ~ |
|-------|--|--|--------|---|----------|
| 201-2 | Financial implications and other risks And opportunities due to climate change | Annual Financial Report 2024 (b) p. 137, p. 214, p. 218, p. 228 | 11.2.2 | ESRS 2 SBM-3-48-(a)- (d)-(e) ESRS E1-18 E1-3-26 E1-9-64 | ✓ |
| 302-1 | Energy consumption within the organization (302-1-a, b, c, e and g) | Annual Financial Report 2024 (b) p. 222 | - | ESRS E1 E1-5 §37; §38 | ~ |



| 302-2 | Energy consumption outside of the organization | Total energy consumption outside the organization | HELLENIQ ENERGY | Units | Comments | 11.1.3 | ESRS 2 GOV-2-26 (b) | ✓ |
|-------|---|---|-----------------|-------|--|--------|------------------------|----------|
| | | Upstream | 3,666,210.00 | GJ | Energy from transport and distribution involves transport by ship. Emission factors were derived from the Fourth IMO GHG Study. The transport of products by EKO ships was included. | | | |
| | | Downstream | 774,872,571.3 | | The Upstream category includes ship transport. The Downstream category includes the corresponding transport by ship and the use of products. | | | |
| 302-3 | Energy intensity | Annual Financial Re p. 223 | port 2024 | | | 11.1.4 | ESRS E1 E1-5 40 ,42 | ~ |



| 302-4 | Reduction of | | | HELLENIG | ENERGY | | | _ | Energy' is a ustainability matter | ✓ |
|-------|--|---|--|--|---|--|---|----|--|----------|
| | energy consumption | | HELLENIQ PETROLEUM S.A. | SUBSIDIA RIES* | TOTAL | UNITS | COMMENTS | fo | or E1 covered by ESRS §AR 16. | |
| | | Energy saved through savings and efficiency improvements (Fuels) | 0.00 | 0.00 | 0.00 | | | | | |
| | | Energy saved through savings and efficiency improvements (Electricity) | 0.00 | 0.00 | 0.00 | | | | | |
| | | Energy saved through savings and efficiency improvements (Heating) | 0.00 | 0.00 | 0.00 | GJ | Energy saving is measured in relation to the | | | |
| | | Energy saved through savings and efficiency improvements (Cooling) | 0.00 | 0.00 | 0.00 | | previous year. | | | |
| | | Energy saved through savings and efficiency improvements (Steam) | 408,158.00 | 0.00 | 408,158.00 | | | | | |
| | | Total energy saving | 408,158.00 | 592.30 | 408,750.3 | | | | | |
| 302-5 | Reductions in energy requirements of products and services | 216,703.67tn CO2 d biodiesel in automo the reference GHG v are presented above against the minimul biodiesel in the autocontained bioethans savings by 63.43%, Apart from the use companies, contributhese GHG emissio known aviation companies with the prir raw materials such a hydrogen (HVO) and average emission in All movements of b Sustainability certification in automotive sustainability criteria sustainability criteria | ue to the use of I tive diesel. The c ralue given in RE by type of road m emission redu motive diesel cc ol in UNL95, UNI 64.46% and 66. of biofuels in the uted to the emiss ns savings deriv pany for promot A1 for their fligh aciples of circular as used cooking turned into ren tensity 9.3 gCO2 iofuels in mixtur cate issued by the a like the type of | piofuels at a vontribution of DII for fossil to fuel. As show action limit of intributed to Cup8 and UNL2 respective road transposions reducticed from a saleting SAF (Sustits from Thessel economy, make wable production and anima ewable production of the saleting SAF (Sustits from Thessel economy, make saleting saleti | olume content f biofuels to the ransport fuel (v n, the biofuels i 50% set by RE GGHG emission 100 gasoline co vely. rt sector, in 202 on of the air trar es agreement b tainable Aviatio saloniki airport ade from 100% I fat from food icts. SAF used v iting in emissio uels are accom e biofuel supply the raw materi | of 5% bioes GHG emis which is equiused are of DII. Precises a savings be entributed to the things of | y 63.31%, while the to GHG emission JiQ Energy Group of or by 2,799.65 tn CO2. CO ABEE and a well-olume content of 8% in The supplied SAF is by sourced renewable aste treated with sustainable with by 90.14%. a unique Proof of uding references to | | 'Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. | ~ |



| 302-5 | Reductions in energy requirements of products and services | Based on EKO ABEE's road fuel sales in 2024 and the energy content prices of the fue each product (fossil fuel and biofuel), it appears that: In the case of Automotive Diesel, the energy savings from the use of biodiesel are 0. In the case of gasoline products, the energy savings from the use of bioethanol are products, the corresponding savings are: 1.8% for UNL95, 1.5% for UNL98, and 1.6. The energy content values used in the calculations are taken from Annex III of RED II a Fossil fuels Gasoline: 32 MJ/kg Diesel: 36 MJ/kg Biofuels Bioethanol: 21 MJ/kg Biodiesel: 33 MJ/kg | 0.6%. 1.7%. For individual % for UNL100. | | 'Energy' is a sustainability matter for E1 covered by ESRS 1 §AR 16. | ~ |
|-------|--|---|--|--------|---|----------|
| 305-1 | Direct (Scope 1) GHG emissions | Annual Financial Report 2024 (b) p. 224 | | 11.1.5 | ESRS E1 E1-4 § 34 (c); E1-6 § 44 (a); § 46; § 50AR § 43 (c) to (d | ✓ |
| 305-2 | Energy indirect (Scope 2) GHG emissions | Annual Financial Report 2024 p. 224 | | 11.1.6 | ESRS E1 E1-4 § 34 (c); E1-6 § 44 (b); § 46; § 49; § 50; § AR 25 (b) and (c); § AR 39 (a) to (d); § AR 40; § AR 45 (a), (c), (d), and (f) | |
| 305-3 | Other indirect | | 2024 | 11.1.7 | E1-4 -34 (a),(b) E1-6 §44 (c); §51; | ~ |
| | (Scope 3) GHG | Total Reporting Group | 51.416.398 | | AR 46 (a) (i) to (k) | |
| | emissions | Category 1: Purchased goods and services | 7.812.533 | | | |
| | | Category 3: Fuel and energy-related Activities (not included in Scope1 or Scope 2) | 187.888 | | | |
| | | Category 4: Upstream transportation and distribution | 334.622 | | | |
| | | Category 5: Waste generated in operations | 1.283 | | | |
| | | Category 9: Downstream transportation and distribution | 268.122 | | | |
| | | Category 10: Processing of sold products | 1.042.505 | | | |
| | | Category 11: Use of sold product | 40.584.091 | | | |
| | | Category 12: End-of-life treatment of sold products | 400.874 | | | |
| | | Category 14: Franchises | 30.889 | | | |
| | | Category 15: Investments | 753.592 | | | |
| | | Category 15: Investments | 753.592 | | | |



| 305-4 | GHG emissions intensity | Annual Financial Report 2024 (b) p. 227 | 11.1.8 | ESRS E1E1-6 §53; §54; §AR 39 (c); §AR 53 (a) | ~ |
|-------|--|---|--------|---|----------|
| 305-5 | Reduction of GHG emissions (305-5-a, c and 2.9.5) | Annual Financial Report 2024 (b) p. 220 | 11.2.3 | ESRS E1 E1-3 §29 (b); E1-4 §34 (c); §AR 25 (b) and (c); | ✓ |
| 308-1 | New suppliers that were screened using environmen tal criteria | All new suppliers (100%) are evaluated during tender processes and commit to uphold the Group's values and policies concerning environmental management, in the event that they undertake a contract. Since 2023, a digital transformation project has been implemented to optimize the process of including new suppliers in the register and their evaluation. One of the pillars of supplier evaluation is the Environmental & Social Framework (human rights, labor issues, Health & Safety, environmental issues, conflict materials, unethical practices, etc.). No significant findings for 2024. | 11.2.3 | ESRS E1 E1-3 §29 (b); E1-4 §34 (c); §AR 25 (b) and (c); | ~ |
| 308-2 | Negative environmen tal impacts in the supply chain and actions taken | Suppliers commit to uphold the Group's value s and policies concerning environmental management at the time of signing of a contract/purchase order for materials or services, which includes a supplier 'compliance clause' with the principles of the UN Global Compact. The contractors who conduct work in the refineries are evaluated after the conclusion of their work, based on their environmental management performance. In 2024, 53 suppliers were assessed for environmental impacts via ECOVADIS. From this assessment no significant findings were identified. | | | ~ |

Pollution of Atmosphere

| 3-3 | Management of material topics | Annual Financial Re <u>ESRS E2-Pollu</u> | • | | | | | | ✓ |
|-------|-------------------------------------|---|-------------------------------|---------------|--------------|----------|---|--|----------|
| 305-6 | | Emissions of ozone depleting substances (ODS) | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | Units | Comments | - | 'Pollution of air' is a sustainability matter for E2 covered by ESRS1 §AR16. | ~ |
| | | HCFCs | 0 | 0 | tn CFC-11 eq | | | | |



| 305-7 | NOx, SO2 and other significant emissions | NOx, SOx and other significant air emissions | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | TOTAL | Units | Comments | 11.3.2 | ESRS E2 E2-4 28 (a) 30 and (c) 31 AR 21 AR 26 | ~ |
|-------|--|--|-------------------------------|---------------|----------|---------------------|---|--------|--|----------|
| | CITIOSIONS | NOx | 2,557.34 | 3.36 | 2,560.70 | tn | Calculation is based on PRTR annual reports. Emission factors are | | | |
| | | NOx Emission Intensity Index | 0.12 | 0.00000147 | 0.12 | kg/tn throughput | from the 3/15 | | | |
| | | SOx | 2,967.08 | 5.68 | 2,972.76 | tn | calculated based on the sulfur percentage in fuel. There are no | | | |
| | | SOx Emission Intensity Index | 0.14 | 0.00000222 | 0.14 | kg/tn throughput | emissions from | | | |
| | | VOC | 1,248.17 | 264.57 | 1,512.74 | tn | benzene emissions and heavy metal concentrations in | | | |
| | | VOC Emission Intensity Index | 0.05 | 0.00006857 | 0.06 | kg/tn throughput | particles (such as Ni, As, | | | |
| | | PMs (PM 10) | 121.25 | 0.22 | 121.47 | tn | Subsidiary methodology: EKO & KALYPSO: calculation | | | |
| | | PMs Emission Intensity Index | 0.01 | 0.00007265 | 0.01 | kg/tn throughput | or estimation; OKTA & DIAXON: Calculation. | | | |
| | | HAP emissions based on type and weight. | 21.96 | 0.00 | 21.96 | tn | | | | |
| | | Number of incidents exceeding air emission limits | 6.00 | 0.00 | 6.00 | # | | | | |
| | | Number of complaints about air quality | 2.00 | 0.00 | 2.00 | tn | | | | |

Health, Safety and Well-being

| 3-3 | Managem ent of material topics | ESRS S1-Own Workforce | | | ✓ |
|-------|--|--|--------|----------------------------|----------|
| 403-1 | Occupatio nal health and safety managem ent system | ESRS S1 - Own Workforce | 11.9.2 | ESRS S1 S1-1-23 | ✓ |
| 403-2 | Hazard identification, risk assessment, and incident investigation | ESRS S1 - Own Workforce Refer to the procedures: "Health, Safety & Environment Incident Reporting and Investigation Procedure", "Corrective Action Procedure", "Highlighting Successful Safety Interventions" (available on intranet only). | 11.9.3 | ESRS S1 S1-3-32- (b)-33 | ✓ |



| 403-3 | Occupatio nal health services | ESRS S1 - Own Workforce | 11.9.4 | 'Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1- AR 16. | ✓ |
|-------|--|---|--------|---|-------------|
| 403-4 | Worker participation, consultation, and communicat ion on occupational health and safety | Annual Financial Report 2024 ESRS S1 - Own Workforce | 11.9.5 | 'Health and safety' and 'Training and skills development' are sustainability matters for S1 covered by ESRS 1 AR 16. | > |



Worker participation, consultation, and communication on occupational health and safety

EKO CYPRUS

There are two safety committees in EKO CYPRUS LTD, their constitution and their role are governed by legislation. Every three years the members are elected by the staff. Members of the two security committees (one for Nicosia and one for Vassilikos) represent workers on all health and safety issues.

OKTA

At OKTA, the Health and Safety System covers issues such as: Personal protective equipment; Participation of employee representatives in health and safety inspections, audits and accident investigations; Training and development; Right to refuse unsafe work; Periodic inspections. The Union has appointed representatives for Health & Safety at work who participate in regular meetings with Management and provide feedback and suggestions for improving issues related to Health & Safety at OKTA. Regular training sessions are held for employees and contractors on health and safety issues by $the \, Health, Safety \, and \, Environment \, organizational \, unit. \, OKTA \, is \, licensed \, to \, carry \, out \, mandatory \, training \, in the environment of the envi$ and workplace risk assessment, with three employees as licensed experts. In addition, there are annual ${\sf var}$ KPI indicators for Safety Visits conducted by all Managers in order to promote a safety culture within the company

DIAXON

In DIAXON, there are training programs for safety and hygiene for the employees, because this sector is $extremely\ important\ to\ the\ principles\ of\ the\ Group\ (Code\ of\ Conduct,\ Related\ Health\ and\ Safety\ Policy,$ DIAXON Internal Regulations (Article 8) and, due to the standard for food safety BRC/IOP Issue 6: Global Standard for Packaging and Packaging Materials, on the other hand, it derives from the relevant law (Law 3850, Government Gazette A (NO: 84) 2/6/2010, ARTICLE 48).

EKO BULGARIA

In accordance with local legislation, there is a Work Conditions Committee, which includes representatives of the employees and the management and provides for a dialogue between the employer and employees on health and safety issues. The company has a Health and Safety Service provider (required by law), which performs risk assessments of the workplace, audits and reviews all $relevant\ practices\ and\ documents\ and\ performs\ yearly\ health\ and\ safety\ trainings\ for\ all\ employees.$

403-5

Worker training on occupational health and safety

Annual Financial Report 2024



(C) ESRS S1 - Own Workforce

Manhours of health & safety training by facility and gender

| | AIC-EIC-TIC | Headquarters | EKO¹ | OKTA | DIAXON | EKO CYPRUS | EKO SUBSIDIARIES (BULGARIA, SERBIA, JUGOPETROL) | ASPRO FOS |
|---|-----------------------------|----------------------|------------------------------|--------------------|------------------|------------------|---|---------------------|
| Employees trained (M/F) | 1,663 (1,565/98) | 157 (103/54) | 163 (145/18) | 194 (159/35) | 89 (83/6) | 46 (33/13) | 297 (172/115) | 41 (35/6) |
| Manhours of training (M/F) | 31,190 (29,738/ 1,451.5) | 1,738 (1,122/616) | 3,152 (2,922.8/ 229.1) | 951 (814/137) | 310 (277/33) | 798 (594/204) | 972.5 (767/205.5) | 230 (156.5/73.5) |
| Contractors & third parties trained (M/F) | 2,870 (2,706/164) | 67 (47/20) | 944 (802/1 42) | 989 (987/2) | 11 (11/0) | 63 (56/7) | 1,245 (909/336) | 41 (32/9) |
| Manhours of training of contractors and others (M/F) | 20,038 (18,910/1,128) | 466 (297/169) | 6,163 (5,654.7/ 508.1) | 494.5 (493.5/1) | 14.3 (14.3/0) | 504 (448/56) | 1,732 (1,251/481) | 251 (177/74) |

Training program on health & safety issues

| | 2020 | 2021 | 2022 | 2023 | 2024 | Target 2024-2025 |
|---|------|------|------|------|------|---------------------|
| Percentage of employees trained | 63% | 73% | 67% | 63% | 71% | >68% |
| Average number of taught manhours per trainee | 10 | 9.6 | 17 | 15.1 | 13.7 | >15 |

11.9.5 'Health and safety' and 'Training and skills development are sustainability matters for S1 covered by ESRS1 AR 16.

11.9.6



| 403-6 | Promotion of worker health | Annual Financial Report 2024 (b) ESRS S1 - Own Workforce The Group, in the context of promoting the health of employees and their families, adopts a series of benefits, which it continuously monitors and enriches. Indicative related benefits, which are granted by most of the Group's companies, are as follows: Medical Program through Group Life & Health Insurance Policy Financial Aid for serious health cases. In addition, daily meals are provided to all employees. Psychological Support Hotline for employees and their families. | 11.9.7 | 'Social protection' is a sustainability matter for S1 covered by ESRS 1-AR 16. | ~ |
|-------|---|--|---------|--|----------|
| 403-7 | Prevention and mitigation of occupational health and safety impacts directly linked by business relationships | Annual Financial Report 2024 (b) ESRS S1 - Own Workforce | 11.9.8 | ESRS S2 S2-4-32- (a) | ~ |
| 403-8 | Workers covered by an occupational health and safety management system | Annual Financial Report 2024 (b) ESRS S1 - Own Workforce Contractors and subcontractors are covered by the health and safety management system at 100%. There are no exceptions. | 11.9.8 | ESRS S2 S2-4-32- (a) | ~ |
| 403-9 | Work-related injuries | Annual Financial Report 2024 (b) ESRS S1 - Own Workforce *Occupational Risk Assessment Studies of each organizational unit (available only on intranet) Rates of injuries, lost working days and absenteeism of the total workforce and the number of fatal accidents at work by region and gender. The safety indicators for AIC, EIC, TIC and Group Subsidiaries' facilities by gender are presented in the following two tables. | 11.9.10 | ESRS S1S1-4-38- (a), S1-14-88-(b)- (c), AR-82 | ~ |



Work-related injuries

| | AIC | EIC | TIC |
|--------------------------------------|-----------|-----------|-----------|
| | Men/Wo | men | |
| Fatalities (own staff) | 0/0 | 0/0 | 0/0 |
| Fatalities (contractors) | 0/0 | 0/0 | 0/0 |
| Fatality Rate (own staff) | 0/0 | 0/0 | 0/0 |
| Fatality rate (contractors) | 0/0 | 0/0 | 0/0 |
| HC WRI ⁽¹⁾ (own staff) | 0/0 | 0/0 | 0/0 |
| HC WRI ⁽¹⁾ (contractors) | 0/0 | 0/0 | 0/0 |
| HC WRIR ⁽²⁾ (own staff) | 0/0 | 0/0 | 0/0 |
| HC WRIR ⁽²⁾ (contractors) | 0/0 | 0/0 | 0/0 |
| LWI (own staff) | 0/1 | 2/0 | 4/0 |
| LWI (contractors) | 1/0 | 1/0 | 2/0 |
| LTIFR (own staff) | 0/0.66 | 1.85/0 | 3.71/0 |
| LTIFR (contractors) | 0.91/0 | 0.90/0 | 2.28/0 |
| LWIF (own staff) | 0/0.66 | 1.85/0 | 3.71/0 |
| LWIF (contractors) | 0.91/0 | 0.90/0 | 2.28/0 |
| AIF (own staff)(3)(4) | 1.33/0.66 | 5.56/0 | 5.57/0 |
| AIF (contractors)(3)(4) | 1.81/0 | 1.79/0 | 5.70/0 |
| LWIS (own staff) ⁽⁵⁾ | 0/119.00 | 6.50/0 | 22.50/0 |
| LWIS (contractors)(5) | 3.00/0 | 3.00/0 | 48.50/0 |
| Man-hours (own staff) | 1,505,813 | 1,079,186 | 1.077.222 |
| Man-hours (contractors) | 1.102,480 | 1.114,565 | 876.468 |
| Absentee rate (own staff) | 3.61/3.80 | 2.91/5.88 | 3.63/0.7 |

(1), (2) HC WRI(R) = High Consequence Work Related Injury (Rate) (3) IR = AIF x 10^{-6}

(4) AIF (TRCF) = TRIFR (Total Recordable Injury Frequency Rate) (5) LDR = LWIS

11.9.10 ESRS S1S1-4-38-(a), S1-14-88-(b)-(c), AR-82





403-9 Work-related injuries

EKO CYPRUS HEADQUA EKO DIAXON **ASPROFOS RTERS** Fatalities 0/0 0/0 0/0 0/0 0/0 (own staff) Fatalities 0/0 0/0 0/0 0/0 0/0 (contractors) Fatality Rate 0/0 0/0 0/0 0/0 0/0 (own staff) Fatality rate 0/0 0/0 0/0 0/0 0/0 (contractors) HCWRI (own 0/0 0/0 0/0 0/0 0/0 staff) **HCWRI** 0/0 0/0 0/0 0/0 0/0 (contractors) **HCWRIR** 0/0 0/0 0/0 0/0 0/0 (own staff) **HCWRIR** 0/0 0/0 0/0 0/0 0/0 (contractors) LWI (own 0/1 1/0 0/0 0/0 0/0 staff) LWI 0/2 4/1 0/0 0/0 0/0 (contractors) LTIFR (own 0/0 1.12/0 0/0 0/0 0/0 staff) 0.50/0.13 0/7.03 0/0 0/0 0/0 (contractors) LWIF (own 0/0 1.12/0 0/0 0/0 0/0 staff) **LWIF** 0/7.03 0.50/0.13 0/0 0/0 0/0 (contractors) AIF (own 2.01/0 5.13/0 0/0 1.12/0 0/0 staff) AIF 3.51/7.03 0.75/0.13 0/0 0/0 0/0 (contractors) LWIS (own 0/0 66.00/0 0/0 0/0 0/0 staff) **LWIS** 0/3.00 41.25/30.00 0/0 0/0 0/0 (contractors) Man-hours 498643 892,854 194884 143,129 205,200 (own staff) Man-hours 284,631 7,953,516 75,281 959,528 181,219 (contractors) Absentee rate 0.55/1.55 0.58/1.87 5.35/4.54 1.32/1.03 1.48/3.83 (own staff)

11.9.10 ESRS \$1\$1-4-38-(a), S1-14-88-(b)-(c), AR-82



403-9 Work-related injuries

EKO EKO JUGOPET OKTA ROL SERBIA BULGARIA Fatalities 0/0 0/0 0/0 0/0 (own staff) Fatalities 0/0 0/0 0/0 0/0 (contractors) Fatality Rate 0/0 0/0 0/0 0/0 (own staff) Fatality rate 0/0 0/0 0/0 0/0 (contractors) HCWRI (own 0/0 0/0 0/0 0/0 staff) **HCWRI** 0/0 0/0 0/0 0/0 (contractors) **HCWRIR** 0/0 0/0 0/0 0/0 (own staff) **HCWRIR** 0/0 0/0 0/0 0/0 (contractors LWI (own 0/1 1/0 0/0 0/0 staff) LWI 2/0 1/0 0/0 0/0 (contractors) LTIFR (own 0/0 0/0 0/0 0/0 staff) **LTIFR** 2.98/0 0.84/0 0/0 0/0 (contractors) LWIF (own 0/0 0/0 0/0 0/0 staff) LWIF 2.98/0 0.84/0 0/0 0/0 (contractors) AIF (own 0/0 0/0 0/0 0/0 staff) 2.98/0 1.68/0.84 0.64/0 0/0 (contractors) LWIS (own 0/0 0/0 0/0 0/0 staff) LWIS 32.50/0 50.00/0 0/0 0/0 (contractors) Man-hours 433,593 97,456 127,440 166,936 (own staff) Man-hours 671,949 1,192,574 1,568,568 888,909 (contractors) Absentee rate 2.05/7.64 0.52/5.08 1.53/1.20 4.40/0.46 (own staff)

Clarification:

- The system of rules used is from the CONCAWE definitions and from the OSHA "Recordkeeping
- The AR (Absenteeism rate) is monitored only for permanent staff.
- The calculations have been made on the basis of 1,000,000 man-hours.
- Includes Group employees and external partners.

11.9.10 ESRS S1 S1-4-38-(a), S1-14-88-(b)-(c), AR-82



| 403-9 | Work-related injuries | For lost workday incidents considered to be the day at Also in 2024, accidents we PSE). According to CONCA | 11.9.10 | ESRS S1S1-4-38- (a), S1-14-88-(b)- (c), AR-82 | ~ | | | |
|--------|-----------------------|--|--|---|--------------|--|--|----------|
| | | HELPE, EKO, HQ | TYPE OF INJURY | Number of LWIs | | | | |
| | | Group's employees | | 8 | | | | |
| | | External partners | | 11 | | | | |
| | | Road accidents (*) | Road accidents | 5 | | | | |
| | | | Falls from a height | 2 | | | | |
| | | Height/Falls | Staff hit by falling objects | 1 | | | | |
| | | | Slips & Trips (same height) | 5 | | | | |
| | | | Explosion or burns | 1 | | | | |
| | | Burns/electrical | Exposure electrical | 0 | | | | |
| | | Confined space entry | Confined space | 0 | | | | |
| | | | Assault or violent act | 0 | | | | |
| | | Construction / Maintenance & Other | Water related, drowning | 0 | | | | |
| | | | Minor injuries (cut, puncture, scrape) | 3 | | | | |
| | | | Struck by | 3 | | | | |
| | | | Road accident (on-site) | 0 | | | | |
| | | | Exposure, noise, chemical, biological vibration | 1 | | | | |
| | | | Caught in, under or between | 2 | | | | |
| | | | Overexertion, strain | 0 | | | | |
| | | | Pressure release | 1 | | | | |
| | | | Other | 0 | | | | |
| | | (*) They are not counted a | gainst the CONCAWE markers | | | | | |
| 403-10 | Work-related | | Annual Financial Report 2024 ESRS S1 - Own Workforce | | | | | ~ |
| | ill health | *Occupational Risk Assess | sment Studies of each organiza | tional unit (available only | on intranet) | | | |



| 403-10 Work-related injuries | | AIC | EIC | TIC | HQ | ЕКО | DIAXON | | 11.9.10 | ESRS S1 S1-4-38- (a), S1-14-88-(b)- (c), AR-82 | ✓ | |
|------------------------------|--|--|--------------------------------|----------------------------|---------------|-----------------|----------------|----------------|---------|--|------------|--|
| | | WRIH ⁽¹⁾ Deaths (own staff) | 0 | 0 | 0 | 0 | 0 | 0 | | | (c)/Fix O2 | |
| | RWRIH ⁽²⁾ (own staff) | 0 | 0 | 0 | 0 | 0 | 0 | | | | | |
| | | EKO CYPRUS | ASPR OFOS | ОКТА | EKO SERBIA | EKO BULGARIA | JUGOPET ROL | | | | | |
| | WRIH ⁽¹⁾ Deaths (own staff) | 0 | 0 | 0 | 0 | 0 | 0 | | | | | |
| | RWRIH ⁽²⁾ (own staff) | 0 | 0 | 0 | 0 | 0 | 0 | | | | | |
| | | (1), (2) (R)WRIH = Clarification: No occupation Contractors are The categoriza | al illnesses o e exempted f | f employees rom recordi | s have been i | onal disease | | ı (P.D. 41/201 | 2). | | | |



Economic Impact

| al Financial Report 2024 ESRS S3-Affected Communities Direct economic value generated | | | 11.14.1 | | / |
|--|---|--|---------|---|---|
| Direct economic value generated | | | | | |
| Operating Cost Employee wages and benefits Payments to providers of capital Total Sequence Montenegro Bulgaria Serbia Cyprus North Macedonia UK Albania Community investments Total **(1)-(2)-(3)** Economic value retained re costs of remuneration and benefits for Group staff: expenses €253,038,022 ax expenses €54,814,534 by the contributions €49,481,987 ax ensurance plan €6,884,107 ax expenses €5,182,275 ax expenses €5,182,275 by study grant for employees €196,704 I support to family members with disabilities €10,407 ability for employees €196,704 I support to family members with disabilities €10,407 ability for employees €115,10 allowance €1,409,777 or employees' children €276,769 for outstanding/achieving children of employees €130,162 sy Easter gifts & Christmas €2,651,431 | | 2023 12,803,061 12,803,061 2023 11,713,874 326,159 372,785 12,412,818 2023 118,107 1,122 488 348 1,851 458 1,075 0 20,898 274,238 245,895 | 11.14.2 | | |
| | 2 Economic value generated Operating Cost Employee wages and benefits Payments to providers of capital Total 3 Payment to government by country Greece Montenegro Bulgaria Serbia Cyprus North Macedonia UK Albania Community investments Total =(1)-(2)-(3) Economic value retained we costs of remuneration and benefits for Group staff: expenses €253,038,022 cax expenses €54,814,534 ce contributions €49,481,987 ee insurance plan €6,884,107 ee pension plan €10,772,098 of employees €5,182,275 5,722,429 aid €391,372 ity study grant for employees €196,704 al support to family members with disabilities €10,407 | 2 | 2 | 2 | 2 Economic value generated 2024 Operating Cost 12,353,868 11,713,874 Employee wages and benefits 348,226 326,159 Payments to providers of capital 371,497 372,785 Total 15,073,591 12,412,818 3 Payment to government by country 2024 Corecce 257,555 118,107 Montenegro 1,332 1,122 Bulgaria 414 488 Serbia 442 348 Cyprus 3,317 1,851 North Macedonia 333 458 UK 448 1,075 Albania 0 Community investments 10,397 20,898 Total 274,238 274,238 274,238 274,238 274,238 276,235 245,895 246,395 246,395 246,395 26 ce contributions €49,481,987 ee insurance plan €6,884,107 ee pension plan €10,772,098 rof employees €5,182,275 372,2429 alid €391,372 tity study grant for employees €196,704 al support to family members with disabilities €10,407 ee/birth/death allowance for a relative of an employee €115,109 allowance €1,409,777 for openployees €161dern €276,769 for outstanding/achieving children of employees €130,162 rsc-Easter gifts & Christmas €2,651,431 ry cars €4,834,402 |



Direct economic value generated and distributed

| | EMPLOYEE INSURANCE COSTS | REMUNERAT ION TAX COSTS | REMUNERAT ION EXPENSES | OTHER FEES & BENEFITS |
|---|--------------------------------|----------------------------|---------------------------|--------------------------|
| HELLENIQ ENERGY S.A. | 1,470,713 | 5,246,405 | 13,713,088 | 1,698,655 |
| HELLENIQ PETROLEUM S.A. | 35,079,605 | 38,150,867 | 177,129,973 | 30,520,402 |
| EKO SA | 6,211,717 | 6,096,074 | 27,874,090 | 4,950,613 |
| ASPROFOS | 1,072,772 | 1,021,340 | 5,495,585 | 693,214 |
| DIAXON | 1361965 | 1016705 | 5592704 | 738,501 |
| EKO AFRODITI | 5,564 | 9,300 | 24,960 | 583 |
| EKO BULGARIA | 260,700 | 189,370 | 2,059,298 | 553,646 |
| EKO CYPRUS | 745,068 | 784,942 | 5,220,008 | 1,044,522 |
| EKO SERBIA | 261,000 | 201,000 | 2,204,000 | 366,000 |
| ELPE FUTURE | 50,171 | 47,160 | 237,748 | 49,930 |
| HELLENIQ ENERGY CONSULTING | 703,723 | 654,546 | 3,442,133 | 385,983 |
| HELLENIQ ENERGY DIGITAL | 294,742 | 301,670 | 1,396,924 | 148,010 |
| HELLENIQ RENEWABLES S.A. | 184,051 | 200,629 | 912,503 | 113,422 |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | 12,032 | 9,273 | 59,039 | 10,870 |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | 18,062 | 9,976 | 81,963 | 10,628 |
| HELLENIQ UPSTREAM S.A. | 266,993 | 316,996 | 1,524,803 | 158,106 |
| HELLENIQ UPSTREAM S.A. | 266,993 | 316,996 | 1,524,803 | 158,106 |
| JUGOPETROLAD | 187,621 | 239,610 | 2,548,567 | 685,700 |
| KALYPSO KEA S.A. | 49,637 | 30,235 | 203,692 | 28,538 |
| OKTA | 1,215,868 | 274,256 | 3,219,356 | 1,396,509 |
| VARDAX S.A. | 29,983 | 14,180 | 97,588 | 18,298 |

11.14.2



| 201-4 | Financial assistance received from government | Annual Financial Report 2024 (b) p. 311 In 2024, HELLENiQ RENEWABLES S.A., a subsidiary of the Group, received the amount of EUR 10 million as investment support from the Recovery and Resilience Facility (RRF) for the Battery Energy Storage System (BESS) in TIC selected by the Regulatory Authority for Energy, Waste and Water in Greece (RAAEY) competition. Also, HELLENiQ RENEWABLES WIND FARMS OF MANI S.A., received the additional amount of EUR 9.5 million due to its inclusion in the Development Law. | 11.21.3 | ~ |
|-------|--|---|---------|---|
| 202-2 | Proportion of senior management hired from local community | Our cooperation with both the wider community and the local communities adjacent to our facilities is ongoing, multi-dimensional and meaningful. In the process of recruitment of personnel at HELPE RSSOPP, a prioritization of residents of the municipalities adjacent to the facilities is foreseen (The definition of significant operating locations and adjacent areas is presented in disclosure 204-1). The percentages of senior managers with a rank from Vice-Director (senior management) and above, from the local community, are shown below: Group Average: 16.62% HELLENIQ PETROLEUM S.A.: 7% HELLENIQ ENERGY: 5% EKO: 3% KALYPSO KEA S.A.: 0% ASPROFOS: 0% DIAXON: 0% EKO BULGARIA: 75% EKO CYPRUS: 93% JUGOPETROL: 100% OKTA: 100% HELLENIQ UPSTREAM S.A.: 0% HELLENIQ RENEWABLES S.A.: 0% HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A.: 0% HELLENIQ RENEWABLES WIND FARMS OF MANI S.A.: 0% HELLENIQ RENEWABLES WIND FARMS OF MANI S.A.: 0% HELLENIQ ENERGY DIGITAL: 0% EKO AFRODITI: 0% VARDAX S.A.: 0% ELPET BALKANIKI: 0% | 11.14.2 | |



Infrastructure investments and services supported

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In October 2024, the double Materiality Study was carried out (see Annual Financial Report 2024, p. 140). Such approaches, as well as quantitative and/or qualitative surveys, implemented in local communities (Company Reputation Monitor) are used to identify investments in infrastructure and other actions that benefit local communities. All projects are carried out in consultation with local communities. Examples include:

Greece

- Heating oil to schools of the neighboring municipalities of Thriasio & West Thessaloniki (€396,467)
- Heating oil and transport fuel to institutions and organizations carrying out social work (€214,075)
- Donation of an isobox for conducting examinations at the Thriasio General Hospital (€21,204)
- Supply of furniture to meet the needs of GNA Evangelismos Polyclinic (€41,500)
- Donation of 11 defibrillators to the Hellenic Red Cross (€9,853)
- Donation of asphalt to the municipality of Elefsina (€33,664)
- Fuels for the fire-fighting vehicles of voluntary organizations and to support with emergency responses και for flood-affected areas in Thessaly (€8,272)
- Implementation of erosion control works in the affected areas of Rapentosa Marathon (€573,642)
- Green Interventions: Enhancing biodiversity in two parks in Thriasio & West Thessaloniki -Municipalities of Megara and Delta (€99,572)
- Support to police forces, such as donation and repair of vehicles, electronic equipment, furniture and
 office supplies (€175,750)
- Renovation of the Hellenic Police building Kypseli Police Station, technical works and project supervision (€46.200)

Cyprus

Alliance with the Cyprus Fire Service (€315,000)

The purchase of two complete sets of equipment, which consist of six rescue tools. These two sets will cover two cities. The goal is to purchase five set in total in order to meet the needs of all the cities in Cyprus.

Provision the Cyprus Fire Service with an inflatable rescue boat and equipment that will include life jackets, helmets, gloves and specialized suits.

Sponsor a training program for eight non-commissioned officers at the Fire Service College in the U.K., which is recognized as the world's leading provider in the training of firefighters and other special rescue units and emergency services.

 Implementation of the 7th consecutive road safety education program "EKO Safe Rider", in the framework of the road accident prevention initiative "City's A.R.T.". (€111,000)

Various TV and radio spots with various messages were aired to create awareness on how to educate car drivers on how to be more considerate of motorcycle drivers, due to the annual increase in accidents.

In addition, 5 podcasts were aired nationwide through one of the largest digital portals, focusing on safe driving, tips and road rage education.

11.14.4

'Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1-AR 16.



| 203-1 | Financial assistance received from government | EKO rewarded the effort of two students who excelled in their performance during the past academic year (€1,750) For the first time, EKO Cyprus announced the launch of the 'Proud of Youth' Program for university graduates who wish to further enrich their knowledge by obtaining a Master's Degree in Cyprus and abroad. (€53,000) The application process for participation in the "Proud of Youth" program started on Wednesday, April 3 and ended on Monday, May 20, 2024. The scholarships emphasized specialized sectors related to the Group's activity, such as: "Engineering and Energy," "Digital Transformation", "Environmental Sciences" and "Economics and Management". The Independent Social Support Body was established in 2015, is subject to law and is financially managed by the Accountant General of the State. It relies exclusively on contributions from natural and legal people and does not burden the state budget, (€53,000) To date, it has been instrumental, through tuition or rent subsidies, so that hundreds of students, from families who faced serious financial and social problems, could finally complete their studies instead of dropping out. Promoting and supporting excellence in healthy competition as well as promoting sports. (€35,000) Donation of heating oil to fourteen foundations and Makarios Hospital to keep warm during the cold winter months. (€300,000) Republic of North Macedonia Regional Fire Fighting Unit of Sveti Nikole - Donation of FF equipment (35 FF metal brooms & 15 backpack water sprinkler) to fight the wildfires in inaccessible terrains in Sv. Nikole - (€3,126) Donation of photovoltaic plant for the elementary school "Sv. Kiril and Methodij" in the Municipality of Veles (€6,429) Donation of PV traffic signs for Municipality of Center - 6 PV traffic signs were donated to Municipality of Center and, installed nearby 5 elementary schools located in the Municipa | 11.14.4 | 'Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1- AR 16. | |
|-------|---|---|---------|---|--|
| 203-2 | Significant indirect economic impacts | Annual Financial Report 2024 (b) p. 253, p. 270 | 11.14.5 | ESRS \$1\$1-4-AR 41 ESRS \$3\$3-4-AR 36 | |



204-1 Proportion of spending on local suppliers Annual Financial Report 2024

<u>p. 253</u>, <u>p. 270</u>

| | Neighboring Municipalities of Thriasio | | of the Mur | municipalities nicipality of aloniki | Neighboring Municipalities of Kozani | | |
|---------------------------|---|------------------------|-----------------------------|--|---|------------------------|--|
| | Payments value (€ thousand) | Number of Suppliers | Payments value (€ thousand) | Number of Suppliers | Payments value (€ thousand) | Number of Suppliers | |
| HELLENIQ PETROLEUM S.A | 32,297 | 173 | 30,306 | 142 | 6,441 | 2 | |
| DIAXON | 33 | 6 | 152 | 22 | 0 | 0 | |
| KOZILIO1(Kozani PV) | 0 | 0 | 0 | 0 | 9 | 5 | |
| TOTAL | 32,330 | 179 | 30,459 | 164 | 6,450 | 7 | |
| TOTAL(%) | 4.7% | 5.9% | 4.4% | 5.4% | 0.9% | 0.2% | |

| | TOTAL | GROUPS | CONTACTS | | |
|---------------------------|--------------------------------|------------------------|--------------------------------|------------------------|--|
| | Payments value (€ thousand) | Number of Suppliers | Payments value (€ thousand) | Number of Suppliers | |
| HELLENIQ PETROLEUM S.A | 69,044 | 317 | 592,249 | 2,405 | |
| DIAXON | 185 | 28 | 5,003 | 266 | |
| KOZILIO1(Kozani PV) | 9 | 5 | 19,306 | 25 | |
| TOTAL | 69,238 | 350 | 616,559 | 2,696 | |
| TOTAL (%) | 10.1% | 11.5% | 89.9% | 88.5% | |

| | | то | TAL | |
|---------------------------|--------------------------------|------------------------|--------------------------------|------------------------|
| | Payments value (€ thousand) | Number of Suppliers | Payments value (€ thousand) | Number of Suppliers |
| HELLENIQ PETROLEUM S.A | 661,293 | 2,722 | 10.4% | 11.6% |
| DIAXON | 5,189 | 294 | 3.6% | 9.5% |
| KOZILIO1(Kozani PV) | 19,315 | 30 | 0.0% | 16.7% |
| TOTAL | 685,797 | 3,046 | 10.1% | 11.5% |
| TOTAL(%) | 100.0% | 100.0% | | |

11.14.6 'Communities'

economic, social and cultural rights' is a sustainability $matter for {\color{red}S3}$ covered by ESRS 1-AR 16.



204-1 Proportion of spending on local suppliers

Payments value (€ thousand) Number of Suppliers Total Local Total Local HELLENIQ ENERGY Holdings S.A. 23,774 20,501 566 491 HELLENIQ ENERGY DIGITAL S.A. 48,017 30,959 171 120 VARDAX S.A. 480 40 332 51 EKO S.A. 153,733 147,881 2,269 2,213 KALYPSO KEAS.A. 59,743 59.743 523 523 EKO BULGARIA EAD 45,658 44,656 481 442 EKO CYPRUS LTD 36,531 33,273 472 EKO SERBIA AD 44,148 43,161 445 414 JUGOPETROLAD (Montenegro) 39,476 37,943 532 455 OKTA (Republic of North Macedonia) 6.936 394 343 6.114 /OKTA AD SKOPJE HELLENIQ UPSTREAM S.A. 1,640 311 74 38 HELLENIQ RENEWABLES S.A 16.503 15,728 129 113 HELLENIQ RENEWABLES WIND FARMS OF 1,896 1,886 44 43 EVIA S.A. **ELPEFUTURE** 2,310 2,309 75 74 HELLENIQ ENERGY CONSULTING 114 114 9 9 ASPROFOS SA 2,103 1,415 206 192 **TANAGRA** 189 163 14 12 SAETHER 409 23 21 441 HELLENIQ UPSTREAM 1,304 920 18 14 KIPARISSIAKOS GULF SA HELLENIQ UPSTREAM SEA OF THRACE SA 31 15 5 4 HELPE PATRAIKOS SA 104 60 10 8 HELLENIQ UPSTREAM WEST KERKYRA SA 30 15 33 32 HELLENIQ UPSTREAM IONIO SA 1,118 652 23 18 HELLENIQ UPSTREAM WEST CRETE SA 16 7 6 19 HELLENIQ UPSTREAM SW CRETE SA 18 16 7 6 HELLENIQ ENERGY REAL ESTATE SA 586 586 43 43 8 8 **FKOTA KO SA** 15 15 EKO AFRODITI MARITIME COMPANY 1,023 809 110 77 EKO IRA MARITIME COMPANY 1,679 1,446 120 86 **ELPET BALKANIKI SA** 436 51 15 10

11.14.6

'Communities' economic, social and cultural rights' is a sustainability matter for S3 covered by ESRS 1-AR 16.



| 204-1 | Proportion of spending on | | | nts value usand) | Number | of Suppliers | 11.14.6 | 'Communities' economic, social and cultural rights' | ✓ |
|-------|--|--|---|--|---|------------------------------|---------|---|----------|
| | local suppliers | | Total | Local | Total | Local | | is a sustainability | |
| | | ENERGIAKI SERVION | 17 | 17 | 4 | 4 | | matter for S3 covered by ESRS 1- | |
| | | ENERGIAKI PYLOU METHONIS SA | 382 | 379 | 19 | 18 | | AR16. | |
| | | ELPE RENEWABLE WIND FARMS MANI A.S. | 2,182 | 2,026 | 76 | 70 | | | |
| | | ATEN ENERGIAKI SA | 223 | 223 | 14 | 14 | | | |
| | | WINDSPUR SA | 52 | 52 | 5 | 5 | | | |
| | | FENSOL S.M. | 50 | 50 | 17 | 16 | | | |
| | | FRONTERA | 221 | 221 | 7 | 7 | | | |
| | | TOTAL | 493,182 | 454,469 | 7,076 | 6,461 | | | |
| | | Local Suppliers % | | 92,2% | | 91,3% | | | |
| | | Sum | 1,178,979 | | 10,122 | | | | |
| | | The Group's policy is to support the local possible and in accordance with the Grou criteria for the selection of our partners (see competitiveness, etc.). In this context, the invests in the appropriate training of subsparticipate in Group projects. | p's Procurer such as safe e Group (alor | ment Regula ty performa ng with othe | ation, consi ince, quality er major coi | dering our y, mpanies) | | | |
| 413-1 | Operations with local community engagement, impact assessments, and development programs | Annual Financial Report 2024 p. 267-271 | | | | | 11.15.2 | ESRS \$3 \$3-2-19, \$3-3-25, \$3-4 AR \$4 (c) | ✓ |
| 413-2 | Operations with significant actual and potential negative impacts on local communities | Annual Financial Report 2024 p. 137, p. 266 | | | | | 11.15.3 | ESRS 2 SBM-3 48 (c), ESRS S3-9 (a) i and (b) | ✓ |



Energy (access and availability) & Mobility

| 3-3 | Management of material topics | Annual Financial Report 2024 (b) ESRS S4-Consumers and End-Users | | | ~ |
|-------|---|--|--------|---|----------|
| 416-1 | Assessment of the health and safety impacts of product and service categories | Annual Financial Report 2024 p. 273 | 11.3.3 | 'Personal safety of consumers and end-users' is a sustainability matter for S4 covered by ESRS 1 AR 16. | ~ |
| 416-2 | Incidents of non-compliance concerning the health and safety impacts of products and services | Annual Financial Report 2024 p.285 HELPE RSSOPP/ EKO SA/ EKO Cyprus/ EKO Serbia/ OKTA/ EKO Bulgaria/ Jugopetrol None. No case of non-compliance | 11.3.3 | ESRS \$4 \$4-4-35 | ~ |
| 417-1 | Requirements for product and service | Copies of product material safety data sheets are provided with packaged products, such as lubricants. No such requirement applies to non packaged products. | 11.3.3 | ESRS S4 S4-4-35 | ✓ |
| | information and labeling | Content, particularly in regard to substances that components of the product product product and environmental or social impacts Content, particularly in regard to substances that could potentially produce an environmental or social impacts Content, particularly in regard to substances that could potentially produce an environmental or social impacts | / | | |
| | | EKO SA, OKTA, EKO CYPRUS, EKO BULGARIA, EKO SERBIA, JUGOPETROL | | | |
| 417-2 | Incidents of non-compliance concerning product and service information and labeling | Annual Financial Report 2024 D.285 EKO ABEE/ OKTA/ EKO Cyprus/ EKO Serbia/ EKO Serbia/ Jugopetrol/ EKO Bulgaria No case of non-compliance, there is a process for checking fuel stations regarding product distribution. | , | ESRS S4 S4-4-35 | ~ |



| 417-3 | Incidents of non- compliance concerning marketing communicati ons | Annual Financial Report 2024 p.285 No case of non-compliance. Full compliance with relevant legislation regarding competition and consumer protection. | - | ESRS S4 S4-4-35 | ~ |
|-------|--|--|---|---------------------------------|----------|
| 418-1 | Substantiated complaints concerning breaches of customer privacy and losses of customer data | Annual Financial Report 2024 December 2024 Decemb | - | ESRS S4 S4-3, AR 23, S4-4-35 | ~ |



Other topics

Circular Economy Principles: Sustainable Water & Waste Management

| Stan Disclosures dard Requiremen | | nce & Data | | GRI sector standard | CSRD (ESRS interoperability/ assurance) | GRI assurance |
|-------------------------------------|---|----------------------------|---------------|---------------------------|---|------------------|
| 301-1 Materials | Materials | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | - | | ~ |
| used by | Crude oil | 15,076,943.54 | 23,112.70 | | | |
| weight o | Throughput (Crude oil + other unit feed streams) | 18,594,785.70 | 2,563,265.32 | | | |
| | Total Products Handled (Crude + other plant feed streams + other and/ or semi-finished products not processed) | 21,547,469.76 | 3,858,224.27 | | | |
| | Materials used | 8,659.55 | 4,570.90 | | | |
| | Catalysts | 2,843.93 | 0.00 | | | |
| | Lubricants | 86.18 | 9.87 | | | |
| | Additives & Other Materials | 5,729.44 | 2,488.91 | | | |
| | Solvents | 0 | 0.42 | | | |
| | Packaging Materials | 0 | 2,071.70 | | | |
| | Materials used in hydrolic fracturing, such as hydraulic fluids, anticorrosives, acids, surfactants, anti-scaling agents, gelling agents, friction reducers, biocides, breakers, iron controllers, scale inhibitors. | N/A | N/A | | | |
| | Other Materials | 0.00 | 9.40 | | | |
| | | | | | | |



| 301-1 | Materials | Materials | | Т | OTAL | Units | | Com | ments | | | | ~ |
|-------|--|--|---|-----------|--|--------|---------------------|---------------------|------------------------------------|--------|--------|--------------------------------------|----------|
| | used by | Crude oil | | 15,10 | 0,056.24 | tn | | | | | | | |
| | weight or volume | Throughput (Crude oil + c feed streams) | other unit | 21,15 | 58,051.02 | tn | | | | | | | |
| | | Total Products Handled other plant feed streams + or semi-finished produ processed) | other and/ | 25,40 | 05,694.03 | tn | | n (C) re ropyler | | | | | |
| | | Materials used | | 13, | 230.45 | tn | copoly | | ic di id | | | | |
| | | Catalysts | | 2,8 | 843.93 | tn | | | ials supplied | | | | |
| | | Lubricants | | 9 | 96.05 | tn | - | | ries and uppliers | | | | |
| | | Additives & Other Mat | terials | 8,3 | 218.35 | tn | The total amount of | | | | | | |
| | | Solvents | | | 0 | tn | | rials us enewal | | | | | |
| | | Packaging Materia | als | 2, | 071.70 | tn | | | | | | | |
| | | Materials used in hydrolic f such as hydraulic flu anticorrosives, acids, surl anti-scaling agents, gellin friction reducers, biocides, iron controllers, scale inf | uids, factants, g agents, , breakers, | | N/A | tn | | | | | | | |
| | | Other Materials | | | 9.40 tn Includes chemicals for steam generators, wastewater treatment, liquid nitrogen, etc. | | | | | | | | |
| 301-2 | Recycled input | Recyclable Materials | HELLE | | SUBSIDIARIE | s* TO | TAL L | Jnits | Comments | | _ | | _ |
| | materials used | Materials used that are | 209,870 | JIVI S.A. | 1,453.56 | 211,32 | | tn | | | | | |
| | | recycled input materials Percentage of materials used that are recycled input materials. | 0.99 |) | 6.99% | 1.00 | 0% | tn | Slops and import Oily sludge | | | | |
| 301-3 | Reclaimed products and their packaging materials | It does not apply to packaging. | petrole | um pro | oducts, fo | r whic | h we | do n | ot use | | - | | ✓ |
| 303-1 | Interactions with water as a shared resource | Annual Financial Re | Annual Financial Report 2024 p.233 | | | | | | | | 11.6.2 | ESRS 2 SBM-3-48 (a) MDR-T §80 (f) | ~ |
| 303-2 | Management of water discharge- related impacts (303-2-iv) | and the sea (12.4%) HELLENIQ ENERGY | The main sources of water abstraction are the public network (82.6%) and the sea (12.4%). 98% of total water consumption comes from HELLENIQ ENERGY's facilities in Greece, which are classified as water stress areas according to the WRI assessment. | | | | | | | 11.6.3 | | ✓ | |



303-3 Water withdrawal

HELLENiQ Water abstraction SUBSIDIARIES* TOTAL Units Comments PETROLEUM S.A per abstraction point 15,213,277.60 708,391.2 15,921,668.80 Methodology:
AIC, EIC: Counters /
Supplier Invoices,
TIC: Meters. OKTA:
Meters, EKO,
KALYPSO & HPC:
Supplier Invoices &
Meters, JPK & AF:
Supplier Invoices Surface water 0.00 26,342.00 26,342.00 Ground water 204,302 385,399 589,701.00 Sea water 1,968,637.00 2,058.00 1,970,695.00 Utility network 12,854,795.60 294,652.20 13,149,447.80 Other sources 185,543 0.00 185,543.00

Water withdrawals' is a sustainability matter for E3 covered by ESRS1 §AR 16.

11.6.4

| Total water abstraction per type | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | TOTAL | Units |
|--|----------------------------|---------------|---------------|-------|
| Total water abstraction per type (m²) | 15,213,277.60 | 708,391.2 | 15,921,668.80 | |
| From freshwater sources (<1.000 mg/L Total Dissolved Solids) | 12,854,795.60 | 680,659.80 | 13,535,454.80 | |
| Other sources (>1.000 mg/L Total Dissolved Solids) | 2,358,482.00 | 25,999.00 | 2,384,481.00 | |
| Surface water | 0.00 | 26,342.00 | 26,342.00 | |
| Freshwater (<1.000 mg/L Total Dissolved Solids | 0.00 | 0.00 | 0.00 | |
| Other (>1.000 mg/L Total Dissolved Solids) | 0.00 | 26,342.00 | 26,342.00 | |
| Groundwater | 204,302.00 | 385,399.00 | 385,399.00 | |
| Freshwater (<1.000 mg/LTotal Dissolved Solids) | 0.00 | 0.00 | 0.00 | |
| Other (>1.000 mg/L Total Dissolved Solids) | 204,302.00 | 385,399.00 | 589,701.00 | m³ |
| Sea Water | 1,968,637.00 | 2,058.00 | 2,058.00 | IIIP |
| Freshwater (<1.000 mg/L Total Dissolved Solids) | 0.00 | 0.00 | 0.00 | |
| Other (>1.000 mg/L Total Dissolved Solids) | 1,968,637.00 | 2,058.00 | 1,970,695.00 | |
| Utility network | 12,854,795.60 | 294,652.20 | 294,652.20 | |
| Freshwater (<1.000 mg/L Total Dissolved Solids) | 12,854,795.60 | 294,652.20 | 13,149,447.20 | |
| Other (>1.000 mg/L Total Dissolved Solids) | 0.00 | 0.00 | 0.00 | |
| Other sources | 0.00 | 0.00 | 0.00 | |
| Freshwater (<1.000 mg/LTotal Dissolved Solids) | 0.00 | 0.00 | 0.00 | |
| Other (>1.000 mg/L Total Dissolved Solids) | 185,543.00 | 0.00 | 185,543.00 | |



303-4 Water discharge

Quantities of HELLENIQ PETROLEUM S.A. SUBSIDIARIES* discharged water by destination TOTAL Units Comments Meters are used at the refineries, Diaxon and OKTA. For the other subsidiaries in Greece (EKO) KALYPSO, EKO Cyprus and ASPROPOS), it is assumed that the water discharged corresponds to 75% of the water abstracted according to the water provider's invoices. Total discharged by destination (m³) 6,971,869 253,293 7,225,161.68 Surface water 0.00 21,615 21,615.45 Ground water 0.00 0.00 0.00 ${\rm m}^{\rm 3}$ 6,971,869 6,966,168.88 Sea water 0.00 For third-party use / 5,700 105,133.60 99,434 organizations

11.6.5 'Water discharges' is a sustainability matter for E3 covered by ESRS1 §AR 16.

| Quantities of discharged water by destination | AIC | EIC | TIC | SUBSIDIARIES* | Units | Comments | |
|--|-----------|-----------|-----------|---------------|-------|--|--|
| Total water discharge by type (m³) | 2,082,403 | 3,283,425 | 1,606,041 | 135,931 | | Meters are used at refineries, Diaxon and OKTA (A+C) For the | |
| In freshwater sources (<1,000 mg/L Total Dissolved Solids) | 0.00 | 0.00 | 0.00 | 0.00 | m³ | other subsidiaries in Greece (EKO/ KALYPSO, EKO Cyprus and ASPROFOS), it is assumed that the | |
| Other sources (>1,000 mg/LTotal Dissolved Solids) | 2,082,403 | 3,283,425 | 1,606,041 | 135,931 | | water discharged corresponds to 75% of the water according to the water provider's invoice | |

| Level of Wastewater Treatment | AIC | EIC | TIC | SUBSIDIARIES* |
|----------------------------------|----------|----------|-----------|--|
| Level of Wastewater Treatment | Tertiary | Tertiary | Secondary | A,B,F,Z(A-Secondary,B-Primary, Secondary,F-Primary,Z-Primary) |

| Annual average values (mg/L) of priority substances: | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | Units |
|--|----------------------------|---------------|-------|
| Lead | 0.82 | 0.00 | |
| Cadmium | 0.05 | 0.00 | |
| Nickel | 3.70 | 0.00 | mg/L |
| Mercury | 0.28 | 0.00 | |
| Benzene | 0.01 | 0.01 | |
| Number of exceedance events | 0.00 | 0.00 | # |

| Water recycling and reuse | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | Units | Comments |
|---------------------------|----------------------------|---------------|-------|--|
| Volume | 2,672,786.54 | 0.00 | m³ | Derived either directly from meters, by calculation or estimation (e.g. for AIC the recycled water comes from the desalination of the distillation |
| Percentage | 0.0168% | 0.00 | % | plant. It is also estimated that 10% of the water from the wastewater plant is used for internal operations - cleaning, hydraulic testing, etc. |



| 303-5 | Water consumption | Annual Financial p. 234 | Report 2024 | | 11.6.6 | ESRS E3 E3-4-28 (a), (b), (d) and (e) | ~ | | | | |
|-------|---|--|--------------------------------------|---------------|-----------|--|---|--|-----------------------------|---|--|
| 306-1 | Waste generation and significant waste-related impacts | Annual Financial D. p. 238 | Annual Financial Report 2024 p. 238 | | | | | | | | |
| 306-2 | Management of significant waste-related impacts (306-2-a and c) | Annual Financial D. p. 238 | nnual Financial Report 2024 p. 238 | | | | | | | | |
| 306-3 | Waste generated | Total Solid Waste Weight by Waste Category | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | TOTAL | Units | Comments | 11.5.4 & 11.8.2 | ESRS E5 E5-5 §37 (a)- 38 | ~ | |
| | generatea | Total weight | 21,351.60 | 6,046.79 | 27,398.39 | | Priority is given to onsite management | | | | |
| | | Hazardous (Total) | 15,866.195 | 2,135.63 | 18,001.83 | | (within facilities). If this is not feasible, they are managed by | | | | |
| | | Non-hazardous (Total) | 5,485.4 | 3,911.16 | 9,396.56 | | specialized waste management companies. The method of management is selected in accordance with Article 4 of the European Directive 2008/98/EC "Waste hierarchy". | specialized waste management companies. The method of management is selected in accordance with Article 4 of the European Directive 2008/98/EC "Waste | | | |
| | | Total weight of waste prevented from disposal, based on disposal method (R) | 21,351.10 | 6,046.12 | 27,397.21 | | | lal It | | | |
| | | Reuse - hazardous | 91.00 | 128.14 | 219.14 | | (R) - Waste prevented from final disposal by disposal | | | | |
| | | Reuse - Non-hazardous | 0.00 | 190.00 | 190.00 | | method - Reuse, recycling and recovery. | | | | |
| | | Recycling - Hazardous | 9,524.45 | 480.95 | 10,005.40 | | | | | | |
| | | Recycling - Non- hazardous | 1,181.44 | 1,682.57 | 2,864.01 | | | | | | |
| | | Recovery-Hazardous | 6,250.25 | 133.28 | 6,383.53 | m³ | | | | | |
| | | Recovery - Non- hazardous | 4,303.96 | 50.64 | 4,354.60 | | | | | | |
| | | Total weight of waste destined for final disposal, by disposal method (D) | 67.57 | 3,380.54 | 3,448.11 | | | | | | |
| | | Incineration - Hazardous | 0.04 | 12.89 | 12.93 | | | | | | |
| | | Incineration - Non- hazardous | 0.00 | 0.16 | 0.16 | | | | | | |
| | | Final disposal (e.g. landfill, thermal desorption, etc.) - Hazardous | 7.49 | 59.63 | 67.12 | | (R) - Waste prevented from final disposal by disposal method - Reuse, recycling and recovery. | I | | | |
| | | Final disposal (e.g. landfill, etc.) - Non- hazardous | 60.04 | 1,987.00 | 2,047.04 | | | | | | |
| | | Other ways of disposal (hazardous) | 0.00 | 1,320.86 | 1,320.86 | | | | | | |
| | | Other means of disposal (non- hazardous) | 0.00 | 0.00 | 0.00 | | | | | | |



306-3 Waste generated

| Total Volume of Wastewater by HELLENiQ Category of Waste and Recipient | | | SUBSIDIARIES* | TOTAL | Units | Comments | |
|---|--|-----------------|---------------|------------|--------------|---|---|
| Total volume of wastewater | 6,9 | 66,168. | 38 | 101,630.47 | 7,072,369.18 | m³ | |
| Recipients | AIC: Saronic EIC: Saronic TIC: Thermaic | | - | - | - | Quantities were obtained from flow meters. There were no planned | |
| Index of waste discharged during the crude oil and fuel cycle. (tn wastewater/ tn throughput) | 0.25 | 0.53 | 0.39 | 0.04 | - | - | discharges. They were not reused by another organization. |
| Hydrocarbon Oil Waste Index (mg/L) spilled during the crude oil and fuel cycle (Hydrocarbon Oil Index - HOI) | Index (mg/L) during the bil and fuel Hydrocarbon | | 0.16 | 0.04 | - | - | |
| BOD | | 59.80 201.47 | | 21.98 | 81.78 | - | |
| COD | | | | 109.50 | 310.97 | - | |
| TSS | | 44.62 | | 14.15 | 58.77 | - | |
| PHENOLS | | 1.12 | | 0.00 | 1.12 | - | |

| Installation | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | TOTAL | Units |
|---|----------------------------|---------------|-----------|-------|
| Total Weight of Hazardous Solid Waste by composition (t) | 15,873.70 | 2,153.95 | 18,027.65 | |
| Category 01 | 0.00 | 1.00 | 1.00 | |
| Category 02 | 0.00 | 0.00 | 0.00 | |
| Category 03 | 0.00 | 0.00 | 0.00 | |
| Category 04 | 0.00 | 0.00 | 0.00 | |
| Category 05 | 1,021.48 | 14.51 | 1,035.99 | |
| Category 06 | 1,323.41 | 0.00 | 1,323.41 | |
| Category 07 | 0.00 | 0.00 | 0.00 | |
| Category 08 | 0.04 | 0.08 | 0.12 | |
| Category 09 | 0.00 | 0.00 | 0.00 | |
| Category 10 | 0.43 | 0.00 | 0.43 | tn |
| Category 11 | 0.00 | 0.00 | 0.00 | |
| Category 12 | 29.69 | 159.04 | 188.73 | |
| Category 13 | 1,341.47 | 1,771.41 | 3,112.88 | |
| Category 14 | 0.00 | 0.00 | 0.00 | |
| Category 15 | 554.91 | 41.41 | 596.32 | |
| Category 15 | 554.91 | 41.41 | 596.32 | |
| Category 16 | 8,855.34 | 165.39 | 9,020.73 | |
| Category 17 | 1,933.01 | 0.24 | 1,933.25 | |
| Category 18 | 0.04 | 0.00 | 0.04 | |
| Category 19 | 803.51 | 0.00 | 803.51 | |
| Category 20 | 10.37 | 0.87 | 11.24 | |

11.5.4 & ESRS E5 E5-5 §37 11.8.2 (a)-38



11.5.4 & ESRS E5 E5-5 §37 306-3 Waste HELLENIQ PETROLEUM S.A. SUBSIDIARIES* Installation TOTAL Units 11.8.2 (a)-38 generated Total weight of non-hazardous solid waste by composition (t) 11,515.87 3,911.18 11,515.87 Category 01 0.00 0.00 0.00 Category 02 0.00 0.00 0.00 Category 03 0.00 0.00 0.00 0.00 0.00 0.00 Category 04 Category 05 407.00 0.00 407.00 0.00 0.00 Category 06 0.00 825.97 802.27 825.97 Category 07 0.02 0.00 0.02 Category 08 Category 09 0.00 0.00 0.00 0.00 0.00 Category 10 0.00 0.00 0.00 0.00 Category 11 Category 12 396.12 0.00 396.12 0.00 0.00 0.00 Category 13 0.00 0.00 0.00 Category 14 Category 15 1,183.88 298.04 1,481.92 2,773.80 0.15 2,773.95 Category 16 2,573.99 3,092.69 518.70 Category 17 Category 18 0.00 0.00 0.00



| | Waste generated | Category 19 | | 73.27 | 79.11 | 152,38 | tn | 11.5.4 & 11.8.2 | ESRS E5 E5-5 §37 (a)-38 | • |
|-------|--------------------|--|----------------|---------------|-----------|----------|-------|--------------------|----------------------------|---|
| | | Category 20 | | 172.91 | 2.212,91 | 2.385,82 | - th | | | |
| 306-4 | Waste diverted | Installation | HELLENiQ. | SUBSIDIARIES* | TOTAL | | Units | 11.5.5 | ESRS E5 E5-5-37 | |
| | from disposal | | PETROLEUM S.A. | | | | | | (b), 38 | |
| | (306-4-a, b, c, e) | Category 01 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 02 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 03 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 04 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 05 | 1,021.48 | 1,035.99 | 1,035.99 | | tn | | | |
| | | Category 06 | 1,323.41 | 1,323.41 | 1,323.41 | | tn | | | |
| | | Category 07 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 08 | 0.04 | 0.12 | 0.12 | | tn | | | |
| | | Category 09 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 10 | 0.43 | 0.43 | 0.43 | | tn | | | |
| | | Category 11 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 12 | 29.69 | 188.73 | 188.73 | | tn | | | |
| | | Category 13 | 1,341.47 | 1,733.23 | 1,733.23 | | tn | | | |
| | | Category 14 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 15 | 554.91 | 577.82 | 577.82 | | tn | | | |
| | | Category 16 | 8,854.13 | 9,018.69 | 9,018.69 | | tn | | | |
| | | Category 17 | 1,926.73 | 1,926.97 | 1,926.97 | | tn | | | |
| | | Category 18 | 0.00 | 0.00 | 0.00 | | tn | | | |
| | | Category 19 | 803.51 | 803.51 | 803.51 | | tn | | | |
| | | Category 20 | 10.37 | 11.12 | 11.12 | | tn | | | |
| | | R-Total hazardous solid waste prevented from disposal (t) | 15,866.17 | 753.85 | 16,620.02 | | tn | | | |



306-4 Waste diverted from disposal (306-4-a, b, c, e)

| AIC | | | | |
|---------------------------|---------------|-----------|-----------|-------|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units |
| Reuse | 0 | 0 | 0 | |
| Recycling | 0 | 8,001.2 | 8,001.2 | |
| Other recovery operations | 0 | 1,852.2 | 1,852.2 | tn |
| Total | Total: | : | 9,853,400 | |
| Non-hazardous waste | Onsite | Offsite | TOTAL | Units |
| Reuse | 0 | 0 | 0 | |
| Recycling | 0 | 1,014.80 | 1,014.80 | |
| Other ways of recovery | 0 | 3,255.90 | 3,255.90 | tn |
| Total | Total: | : | 4,270.70 | |
| Waste avoidance | Total waste d | liverted: | 14,124.10 | |

| EIC | | | | |
|---------------------------|---------------|-----------|-----------|-------|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units |
| Reuse | 0 | 91 | 91 | |
| Recycling | 0 | 0 | 0 | |
| Other recovery operations | 0 | 3,434.472 | 3,434.472 | tn |
| Total | Total: | | 3,525.472 | |
| Non-hazardous waste | Onsite | Offsite | TOTAL | Units |
| Reuse | 0 | 0 | 0 | |
| Recycling | 0 | 0 | 0 | |
| Other ways of recovery | 0 | 56.48 | 56.48 | tn |
| Total | Total: | | 56.48 | |
| Waste avoidance | Total waste d | iverted: | 3,581.96 | |

11.5.5 ESRS E5 E5-5-37 (b), 38



306-4 Waste diverted from disposal (306-4-a, b, c, e)

| TIC | | | | |
|---------------------------|---------------|-----------|-----------|-------|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units |
| Reuse | 0 | 0 | 0.00 | |
| Recycling | 0 | 1,523.250 | 1,523.250 | *** |
| Other recovery operations | 0 | 963.573 | 963.573 | tn |
| Total | Total: | | 2,486.823 | |
| Non-hazardous waste | Onsite | Offsite | TOTAL | Units |
| Reuse | 0 | 0 | 0 | |
| Recycling | 0 | 166.64 | 166.64 | tn |
| Other ways of recovery | 0 | 991.58 | 991.58 | ui |
| Total | Total: | | 1,158.22 | |
| Waste avoidance | Total waste d | iverted: | 3,645.05 | |

| SUBSIDIARIES | OKTA, EKO/ KA BL | LYPSO, DIAXON JLGARIA, JUGOI | | | SERBIA, EKO |
|---------------------------|---------------------|---------------------------------|---------|-------|--|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units | Comments |
| Reuse | 0,00 | 0,00 | 0,00 | | For EKO Serbia and Bulgaria, when |
| Recycling | 36,22 | 1,29 | 37,51 | | calculating the amount of non-hazardous |
| Other recovery operations | 0,00 | 30,21 | 30,21 | tn | waste, an estimate is used according to the density of the 1m3 bin |
| Total | Total: | | 67,72 | | and the frequency of its collection by the |
| Non-hazardous waste | Onsite | Offsite | TOTAL | Units | respective waste manager. |
| Reuse | 0,00 | 190,00 | 190,00 | | |
| Recycling | 10,00 | 954,36 | 964,36 | 1 | |
| Other ways of recovery | 0,00 | 399,62 | 399,62 | tn | |
| Total | Total: | | 1553,98 | | |
| Waste avoidance | Total waste d | iverted: | 1621,70 | | |

11.5.5 ESRS E5 E5-5-37 (b), 38



306-5 Waste directed to disposal (306-5-a, b, c, e)

| Installation | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | TOTAL | Units | Comments |
|---|----------------------------|---------------|-----------|-------|---|
| Category 01 | 0.00 | 0.00 | 1.00 | | |
| Category 02 | 0.00 | 0.00 | 0.00 | | |
| Category 03 | 0.00 | 0.00 | 0.00 | | |
| Category 04 | 0.00 | 0.00 | 0.00 | | |
| Category 05 | 1,021.48 | 0.00 | 1,035.99 | | |
| Category 06 | 1,323.41 | 0.00 | 1,323.41 | | |
| Category 07 | 0.00 | 0.00 | 0.00 | | |
| Category 08 | 0.04 | 0.00 | 0.12 | | |
| Category 09 | 0.00 | 0.00 | 0.00 | | Classification by |
| Category 10 | 0.43 | 0.00 | 0.43 | | category according to the European Waste |
| Category 11 | 0.00 | 0.00 | 0.00 | tn | List referred to in Commission Decision |
| Category 12 | 29.69 | 0.00 | 188.73 | ui | 2014/955/EU. |
| Category 13 | 1,341.47 | 883.78 | 3,112.88 | | The first level of the European Waste List |
| Category 14 | 0.00 | 0.00 | 0.00 | | has been used. |
| Category 15 | 554.91 | 2.15 | 596.32 | | |
| Category 16 | 8,855.34 | 5.23 | 9,020.73 | | |
| Category 17 | 1,933.01 | 1.26 | 1,933.25 | | |
| Category 18 | 0.04 | 0.00 | 0.04 | | |
| Category 19 | 803.51 | 0.00 | 803.51 | | |
| Category 20 | 10.37 | 0.33 | 11.24 | | |
| D- Total hazardous solid waste to final disposal (t) | 15,873.70 | 892.75 | 18,027.65 | | |

ESRS E5 E5-5-37

(b), 38

11.5.6

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306-5 Waste directed to disposal (306-5-a, b, c, e)

| Installation | HELLENIQ PETROLEUM S.A. | SUBSIDIARIES* | TOTAL | Units | Comments |
|--|----------------------------|---------------|-----------|-------|--|
| Category 01 | 0.00 | 0.00 | 0.00 | | |
| Category 02 | 0.00 | 0.00 | 0.00 | | |
| Category 03 | 0.00 | 0.00 | 0.00 | | |
| Category 04 | 0.00 | 0.00 | 0.00 | | |
| Category 05 | 407.00 | 0.00 | 407.00 | | |
| Category 06 | 0.00 | 0.00 | 0.00 | | |
| Category 07 | 23.70 | 802.27 | 825.97 | | |
| Category 08 | 0.02 | 0.00 | 0.02 | | |
| Category 09 | 0.00 | 0.00 | 0.00 | | |
| Category 10 | 0.00 | 0.00 | 0.00 | | Classification by category according to |
| Category 11 | 0.00 | 0.00 | 0.00 | | the European Waste List referred to in Commission Decision |
| Category 12 | 396.12 | 0.00 | 396.12 | tn | 2014/955/EU. |
| Category 13 | 0.00 | 0.00 | 0.00 | | The first level of the European Waste List |
| Category 14 | 0.00 | 0.00 | 0.00 | | has been used. |
| Category 15 | 1,183.88 | 298.04 | 1,481.92 | | |
| Category 16 | 2,773.80 | 0.15 | 2,773.95 | | |
| Category 17 | 2,573.99 | 518.70 | 3,092.69 | | |
| Category 18 | 0.00 | 0.00 | 0.00 | | |
| Category 19 | 803.51 | 79.11 | 803.51 | | |
| Category 20 | 10.37 | 2,212.91 | 11.24 | | |
| D-Total hazardous solid waste to final disposal (t) | 7,604.69 | 3,911.18 | 11,515.87 | | |

ESRS E5 E5-5-37

(b), 38

11.5.6

| AIC | | | | |
|--|--------|---------|-------|-------|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units |
| Incineration (with energy recovery) | 0 | 0 | 0 | |
| Incineration (without energy recovery) | 0 | 0 | 0 | |
| Other disposal operations | 0 | 0 | 0 | |
| Total | Total: | | 0 | |
| Non-hazardous waste | Onsite | Offsite | TOTAL | |
| Incineration (with energy recovery) | 0 | 0 | 0 | |
| Incineration (without energy recovery) | 0 | 0 | 0 | |
| Landfilling | 0 | 0 | 0 | |
| Other disposal operations | 0 | 0 | 0 | |
| Total | 0 | | 0 | |
| Total waste to final dispo | sal | | 0 | |

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306-5 Waste diverted from disposal (306-4-a, b, c, e)

| EIC | | | | |
|--|--------|---------|-------|-------|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units |
| Incineration (with energy recovery) | 0 | 0 | 0 | |
| Incineration (without energy recovery) | 0 | 0 | 0 | |
| Landfilling | 0 | 0 | 0 | |
| Other disposal operations | 0 | 0 | 0 | |
| Total | Total: | | 0 | |
| Non-hazardous waste | Onsite | Offsite | TOTAL | |
| Incineration (without energy recovery) | 0 | 0 | 0 | tn |
| Incineration (with energy recovery) | 0 | 0 | 0 | |
| Landfilling | 0 | 0 | 0 | |
| Other disposal operations | 0 | 0 | 0 | |
| Total | 0 | | 0 | |
| Total waste to final dispo | sal | | 0 | |

| TIC | | | | |
|--|--------|---------|-------|-------|
| Hazardous Waste | Onsite | Offsite | TOTAL | Units |
| Incineration (with energy recovery) | 0 | 0 | 0 | |
| Incineration (without energy recovery) | 0 | 0.04 | 0.04 | |
| Landfilling | 0 | 7.49 | 7.49 | |
| Other disposal operations | 0 | 0 | 0 | |
| Total | Total | : | 7.53 | |
| Non-hazardous waste | Onsite | Offsite | TOTAL | |
| Incineration (without energy recovery) | 0 | 0 | 0 | tn |
| Incineration (with energy recovery) | 0 | 0 | 0 | |
| Landfilling | 0 | 60.04 | 60.04 | |
| Other disposal operations | 0 | 0 | 0 | |
| Total | 0 | | 60.04 | |
| Total waste to final dispo | sal | | 67.57 | |

11.5.5 ESRS E5 E5-5-37 (b), 38



Biodiversity and Ecosystems

| 304-1 | Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas (304-1-a-iv and v) | Annual Financial Report (b) p.236-237 | 11.4.2 | | ~ |
|-------|--|---|--------|---|----------|
| 304-2 | Significant impacts of activities, products and services on biodiversity (304-2-a-i, ii, iii, iv, v and vi; 304-2-b) | Annual Financial Report p.236-237 | 11.4.3 | | ✓ |
| 304-3 | Habitats protected or restored (304-3-a and b) | Annual Financial Report 2024 p.236-237 | 11.4.4 | - | ✓ |
| 304-4 | IUCN Red List species and national conservation list species with habitats in areas affected by operations | Annual Financial Report p.236-237 | 11.4.5 | | ✓ |



Employee Attraction, Training, Development and Retention

| Stan dard | Disclosures & Requirements | (| Cross - referenc | e & Data | | | GRI sector standard | CSRD (ESRS interoperability/ assurance) | GRI assu |
|--------------|--|--|--|--|---------------------------|--------------------|---------------------------|---|-------------|
| 201-3 | Defined benefit plan obligations and other retirement plans | Annual Financial p. 332-334 | Report | | | | - | | • |
| 202-1 | Ratios of standard entry level wage by gender compared to local minimum wage | On the assumption collective, and proposed for, Group without any discrete No employee with the collection of the collec | ofessional ba p employees rimination/di h an indefini | argaining agree are paid above ifferentiation. te contract is p | ements ((e and bey | CBAs) ond CBAs, | - | ESRS 51 S1-10-67-71-AR 72-73 | |
| | wage | basic wage in any Ratios of standard e | | parry. npared to local minim | um wage | l | | | |
| | wage | | | | um wage % | | | | |
| | wage | Ratios of standard e | ntry level wage con Local minimum | npared to local minim | | | | | |
| | wage | Ratios of standard el | ntry level wage con Local minimum wage (€) | npared to local minim Minimum entry level wage (€) | % | | | | |
| | wage | Ratios of standard el Payments value (€ thousand) GREECE | ntry level wage con Local minimum wage (€) 830 | mpared to local minim Minimum entry level wage (€) 1,193.09 | % 144% | | | | |
| | wage | Ratios of standard el Payments value (€ thousand) GREECE EKO BULGARIA | ntry level wage con Local minimum wage (€) 830 477 | mpared to local minim Minimum entry level wage (€) 1,193.09 | % 144% 211% | | | | |
| | wage | Ratios of standard el Payments value (€ thousand) GREECE EKO BULGARIA EKO CYPRUS | ntry level wage con Local minimum wage (©) 830 477 1,000 | npared to local minim Minimum entry level wage (€) 1,193.09 1008 1,800 | % 144% 211% 180% | | | | |



New employee hires and employee turnover

New hires* by age group and gender

| Company | | <30 | 30-50 | >50 | M | F |
|---------------------------------|-----|-------|-------|-------|-------|-------|
| LIEU EN LO DETECCI TI III C | No. | 27 | 167 | 2 | 180 | 16 |
| HELLENIQ PETROLEUM S.A. | % | 13.8% | 85.2% | 1% | 91.8% | 8.2% |
| LIELLENI'S ENIEDGYGA | No. | 0 | 10 | 5 | 9 | 6 |
| HELLENIQ ENERGY S.A. | % | 0% | 66.7% | 33.3% | 60% | 40% |
| FIGGA | No. | 3 | 32 | 1 | 32 | 4 |
| EKO S.A. | % | 8.3% | 88.9% | 2.8% | 88.9% | 11.1% |
| EKO PULI CAPIA | No. | 2 | 2 | 0 | 1 | 3 |
| EKO BULGARIA | % | 50% | 50% | 0% | 25% | 75% |
| EI/O CEDDIA | No. | 5 | 11 | 1 | 8 | 9 |
| EKO SERBIA | % | 29% | 65% | 6% | 47% | 53% |
| DIAVON | No. | 0 | 0 | 0 | 0 | 0 |
| DIAXON | % | 0% | 0% | 0% | 0% | 0% |
| LIELLENI'O ENIEDOV CONICLIITING | No. | 6 | 32 | 2 | 14 | 26 |
| HELLENIQ ENERGY CONSULTING | % | 15% | 80% | 5% | 35% | 65% |
| SI DESIJI IDS | No. | 0 | 3 | 0 | 2 | 1 |
| ELPEFUTURE | % | 0% | 100% | 0% | 66.7% | 33.3% |
| | No. | 1 | 7 | 0 | 6 | 2 |
| HELLENIQ RENEWABLES S.A. | % | 12.5% | 87.5% | 0% | 75% | 25% |
| | No. | 6 | 5 | 0 | 10 | 1 |
| JUGOPETROL | % | 54.5% | 45.5% | 0% | 91% | 9% |
| | No. | 7 | 20 | 0 | 21 | 6 |
| OKTA | % | 26% | 74% | 0% | 77.8% | 22.2% |
| | No. | 0 | 11 | 0 | 7 | 4 |
| EKO CYPRUS | % | 0% | 100% | 0% | 64% | 36% |
| ACRECIO | No. | 0 | 0 | 0 | 0 | 0 |
| ASPROFOS | % | 0% | 0% | 0% | 0% | 0% |
| LIEU ENIO LIDOTDEANA CA | No. | 0 | 0 | 0 | 0 | 0 |
| HELLENIQ UPSTREAM S.A. | % | 0% | 0% | 0% | 0% | 0% |
| | No. | 3 | 11 | 0 | 5 | 9 |
| HELLENIQ ENERGY DIGITAL | % | 21% | 79% | 0% | 35.7% | 64.3% |
| | No. | 3 | 1 | 0 | 2 | 2 |
| KALYPSO KEA S.A. | % | 75% | 25% | 0% | 50% | 50% |
| | No. | 0 | 2 | 0 | 2 | 0 |
| EKO AFRODITI | % | 0% | 100% | 0% | 100% | 0% |
| HELLENIQ RENEWABLES WIND | No. | 0 | 0 | 0 | 2 | 0 |
| FARMS OF EVIA S.A. | % | 0% | 0% | 0% | 0% | 0% |
| HELLENIQ RENEWABLES WIND | No. | 0 | 0 | 0 | 2 | 0 |
| FARMS OF MANI S.A. | % | 0% | 0% | 0% | 0% | 0% |
| | No. | 0 | 0 | 1 | 1 | 0 |
| VARDAX S.A. | % | 0% | 0% | 100% | 100% | 0% |
| | No. | 0 | 0 | 0 | 0 | 0 |
| ELPET BALKANIKI | % | 0% | 0% | 0% | 0% | 0% |

11.10.2 ESRS \$1\$1-6-50-(c)





New employee hires and employee turnover

| xits* by age group and gender | | | | | | |
|-------------------------------|-----|-------|-------|-------|-------|-------|
| Company | | <30 | 30-50 | >50 | M | F |
| LIELLENIO DETDOLELIMO A | No. | 2 | 8 | 129 | 120 | 19 |
| HELLENIQ PETROLEUM S.A. | % | 1.4% | 5.8% | 92.8% | 86.3% | 13.7% |
| HELLENIQ ENERGY S.A. No. % | | 0 | 2 | 7 | 7 | 2 |
| HELLENIQ ENERGY S.A. | % | 0% | 22.2% | 92.8% | 86.3% | 13.7% |
| Fixe e. t | No. | 0 | 2 | 7 | 7 | 2 |
| EKO S.A. | % | 2.1% | 12.5% | 85.4% | 75% | 25% |
| EVO DIVI GADIA | No. | 2 | 4 | 0 | 2 | 4 |
| EKO BULGARIA | % | 33.3% | 66.7% | 0% | 33.3% | 66.7% |
| EVO OFFICIA | No. | 3 | 6 | 0 | 3 | 6 |
| EKO SERBIA | % | 33.3% | 66.7% | 0% | 33.3% | 66.7% |
| | No. | 0 | 4 | 0 | 3 | 1 |
| DIAXON | % | 0% | 100% | 0% | 75% | 25% |
| | No. | 1 | 3 | 2 | 5 | 1 |
| HELLENIQ ENERGY CONSULTING | % | 16.7% | 50% | 33.3% | 83.3% | 16.7% |
| | No. | 1 | 0 | 0 | 1 | 0 |
| ELPEFUTURE | % | 100% | 0% | 0% | 100% | 33.3% |
| | No. | 0 | 1 | 0 | 0 | 1 |
| HELLENIQ RENEWABLES S.A. | % | 0% | 100% | 0% | 0% | 100% |
| | No. | 0 | 5 | 1 | 4 | 2 |
| JUGOPETROL | % | 0% | 83.3% | 16.7% | 66.7% | 33.3% |
| | No. | 2 | 7 | 28 | 29 | 8 |
| OKTA | % | 5.4% | 18.9% | 75.7% | 78.4% | 21.6% |
| | No. | 0 | 5 | 1 | 3 | 3 |
| EKO CYPRUS | % | 0% | 83.3% | 16.7% | 50% | 50% |
| | No. | 0 | 2 | 3 | 5 | 0 |
| ASPROFOS | % | 0% | 40% | 60% | 100% | 0% |
| | No. | 0 | 0 | 0 | 0 | 0 |
| HELLENIQ UPSTREAM S.A. | % | 0% | 0% | 0% | 0% | 0% |
| | No. | 2 | 0 | 0 | 1 | 1 |
| HELLENIQ ENERGY DIGITAL | % | 100% | 0% | 0% | 50% | 50% |
| | No. | 3 | 1 | 0 | 2 | 2 |
| KALYPSO KEA S.A. | % | 75% | 25% | 0% | 50% | 50% |
| | No. | 0 | 0 | 0 | 0 | 0 |
| EKO AFRODITI | % | 0% | 0% | 0% | 0% | 0% |
| HELLENIQ RENEWABLES WIND | No. | 0 | 0 | 0 | 0 | 0 |
| FARMS OF EVIA S.A. | % | 0% | 0% | 0% | 0% | 0% |
| HELLENIQ RENEWABLES WIND | No. | 0 | 0 | 0 | 2 | 0 |
| FARMS OF MANI S.A. | % | 0% | 0% | 0% | 0% | 0% |
| | No. | 0 | 0 | 0 | 0 | 0 |
| VARDAX S.A. | % | 0% | 0% | 0% | 0% | 0% |
| | No. | 0 | 0 | 0 | 0 | 0 |
| ELPET BALKANIKI | % | 0% | 0% | 0% | 0% | 0% |

11.10.2 ESRS E5 E5-5-37 (b), 38





| 401-1 | New employee hires and employee turnover | *Rates hav e been calculated as a percentage of total hires and exits respectively, in 2024. The Group's average employee exit rate for 2024 was 7.5% while the average retention rate for the same year was 92.5% and is broken down by company as follows: HELLENIQ PETROLEUM: 93.77% HELLENIQ ENERGY: 86.15% EKO S.A.: 89.77% DIAXON: 96.58% ASPROFOS: 95.83% EKO CYPRUS: 92.77% EKO BULGARIA: 91.3% EKO SERBIA: 83.33% JUGOPETROL: 94.12% OKTA: 86.05% HELLENIQ UPSTREAM S.A.: 100% HELLENIQ ENERGY CONSULTING: 91.04% HELLENIQ RENEWABLES S.A: 93.3% ELPEFUTURE: 83.33% | 11.10.2 | ESRS S1 S1-6-50- (c) | ~ |
|-------|---|---|---------|-------------------------|---|
| | | ELPEFUTURE: 83.33% HELLENIQ ENERGY DIGITAL: 100% KALYPSO KEA S.A.: 60% EKO AFRODITI: 100% HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A.: 100% HELLENIQ RENEWABLES WIND FARMS OF MANI S.A.: 100% VARDAX S.A.: 100% ELPET BALKANIKI: 100% It should be noted that in HELLENIQ ENERGY Group, an exit scheme program | | | |
| | | was released in 2024. | | | |
| 401-2 | Benefits provided to full- time employees that are not provided to temporary or part-time employees | Annual Financial Report D. 259 HELLENIQ ENERGY, HELLENIQ PETROLEUM & EKO The benefits provided for in Collective Agreements and Internal Labor Regulations or in the individual labor contracts of the executives holding managerial positions, concern employees under permanent contract and not employees under fixed-term contract - full or part-time regardless of where they work. The benefits which are not provided to the employees under fixed term contract are: | 11.10.3 | ESRS S1 S1-11-74 | ~ |



Benefits provided to full-time employees that are not provided to temporary or part-time employees

- Pension plan through Group Contracts
- Medical plan through Life & Health Group Contract
- Financial support for serious health issues
- Covering employees' children summer camps
- Wedding/birth/death allowance
- School allowance
- University education allowance
- Vouchers/gifts Easter & Christmas/financial support for families with large families
- Support to employees' family members with special needs
- Financial aid awards for distinguished school students and university students, children of employees, who succeeded at entering the Universities of the country
- Allowance for nursery/kindergarten
- Long service anniversary gifts
- Employee Loans

For managers, the additional benefits provided are:

- Company cars
- Fuel
- Tolls (e-pass)
- Mobile telephone

ASPROFOS

The company's benefits apply to all employees.

JUGOPETROL

Permanent and fixed-term employees who have an employment contract with Jugopetrol have the same rights under the provisions of the Collective Labor Agreement. These include scholarships, annual allowances for self-supporting parents, childbirth, sickness, medical care, death of an employee or a family member, as well as coverage for the consequences of natural disasters, medical insurance plan, winter allowance, anniversary awards, housing loans, discount fuel cards. Depending on the job, a company car is provided where applicable.

EKO SERBIA

In accordance with the Regulation, we provide equal benefits to permanent and fixed-term employees (such as private health insurance and additional benefits in accordance with the Regulation).

EKO CYPRUS

Health insurance, pension, welfare funds and life insurance for all workers.

EKO BULGARIA

All employees are provided with benefits such as food vouchers, private health insurance, life insurance, co-financed sports cards, and cards for fuel and consumer products at EKO fuel stations.

DIAXON

There are no part-time workers.

OKTA

In accordance with the Regulations, the Company provides the same benefits to employees with indefinite and fixed-term contracts. There are no part-time employees.

11.10.3 ESRS \$1\$1-11-74



| Minimum notice periods regarding operational changes other than changes concerning terms of employment contracts, Management Notices are issued, and the minimum period is set on a case-by-case basis. Other means of communication: individual letters, memos, notification of Management or Service Council decisions. Any change in the terms of an individual employment contract shall be notified to the parties concerned in accordance with the provisions of law 5053/2023 within one month of the forthcoming change. Local legislation and employment contracts also apply on a case-by-case basis, e.g. in Bulgaria, North Macedonia the minimum period is |
|--|
| 30 days, in Montenegro it is 15-90 days depending on the type of change (30 days according to collective agreements), in Serbia 7 days, while in Cyprus, sufficient time and support is given to facilitate the change (there is relevant legislation). |



| 01-3 | Parental leave | All staff, regardless of gend data by gender for 2024. | er, are entitled by law to parental leave*. T | he table below | shows the r | elevant | 11.10.4 | ESRS \$1 \$1-15-93 |
|------|-----------------------------|--|--|--------------------------------|------------------------------|----------------------------|---------|----------------------------------|
| | | | | Men | Women | Total | | |
| | | Number of employees e | ntitled to parental leave | 568 | 66 | 634 | | |
| | | Number of employees g | ranted parental leave | 128 | 49 | 177 | | |
| | | | eturning to work after parental leave by re that ended within the current | 128 | 18 | 146 | | |
| | | remained in the compar | Number of employees who returned from parental leave and remained in the company 12 months after their return (for parental leave expired in the previous year) Return rate after parental leave for the current reporting year | | | 176 | | |
| | | Return rate after parenta | al leave for the current reporting year | 99.2% | 97.5% | 98.8% | | |
| | | Rate of stay after parent | al leave for the current reporting year | 99.3% | 87.1% | 97.2% | | |
| | | *Parental leave includes pater | *Parental leave includes paternity, childbirth, maternity protection and childcare leave. | | | | | |
|)4-1 | Average hours | Annual Financial F | Report 2024 | | | | 11.10.6 | ESRS S1 S1-13 §83 (b) and §84 |
| | of training per year per | ESRS S1 - Ow | <u>rn Workforce</u> | | | | | (b) and go- |
| | employee | Trainee's breakdown by gender and company: | | | | | | |
| | | | Number of males who participated in at least 1 training course/seminar | Number of n at least 1 trai | nales who pa ning course, | articipated in /seminar | | |
| | | HELLENIQ ENERGY S.A. | 25 | | 15 | | | |
| | | HELLENIQ PETROLEUM S.A. | 1,909 | | 217 | | | |
| | | EKO S.A. | 143 | | 89 | | | |
| | | KALYPSO KEA | 2 | | 0 | | | |
| | | DIAXON | 80 | | 14 | | | |
| | | ASPROFOS | 52 | | 28 | | | |
| | | JUGOPETROL | 38 | | 19 | | | |
| | | EKO CYPRUS | 47 | | 29 | | | |
| | | EKO SERBIA | 25 | | 29 | | | |
| | | EKO BULGARIA | 33 | | 38 | | | |
| | | | | | | | | |
| | | OKTA | 171 | HELLENIQ ENERGY 18 28 | | | | |
| | | HELLENIQ ENERGY | | | 28 | | | |
| | | HELLENIQ ENERGY | | | 28 5 | | | |
| | | HELLENIQ ENERGY CONSULTING HELLENIQ | 18 | | | | | |
| | | HELLENIQ ENERGY CONSULTING HELLENIQ RENEWABLES HELLENIQ RENEWABLES WIND | 18 | | 5 | | | |
| | | HELLENIQ ENERGY CONSULTING HELLENIQ RENEWABLES HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. HELLENIQ RENEWABLES WIND | 18 14 1 | | 5 | | | |



Average hours of training per year per employee

| | Number of males who participated in at least 1 training course/seminar | Number of males who participated in at least 1 training course/seminar |
|-----------------|--|--|
| ELPEFUTURE | 5 | 2 |
| ELPET BALKANIKI | 0 | 0 |
| VARDAX | 0 | 1 |
| EKO AFRODITI | 1 | 0 |

11.10.5 Social dialogue and 'Collective bargaining'are sustainability matters for S1 covered by ESRS 1-AR 16.

Training expenditure breakdown:

| | Cost in € |
|---|-----------|
| HELLENIQ ENERGY S.A. | €125,485 |
| HELLENIQ PETROLEUM S.A. | €502,433 |
| EKO S.A. | €98,566 |
| KALYPSO KEA | €0 |
| DIAXON | €9,500 |
| ASPROFOS | €33,957 |
| JUGOPETROL | €13,659 |
| EKO CYPRUS | €43,681 |
| EKO SERBIA | €17,575 |
| EKO BULGARIA | €18,931 |
| OKTA | €34,707.5 |
| HELLENIQ ENERGY CONSULTING | €0 |
| HELLENIQ RENEWABLES | €7,895 |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | €0 |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | €0 |
| HELLENIQ ENERGY DIGITAL | €9,815 |
| HELLENIQ UPSTREAM | €129,737 |
| ELPEFUTURE | €5,577 |
| ELPET BALKANIKI | €0 |
| VARDAX | €0 |
| EKO AFRODITI | €0 |



Average hours of training per year per employee

Average hours of **Number of participants per training course and company:**

| | In-house training seminars | Open seminars | Foreign languages | Academic education | Other type of training/ seminar/certifications/ examinations/conferences |
|---|----------------------------------|------------------|----------------------|--------------------|--|
| HELLENIQ ENERGY S.A. | 68 | 6 | 0.00 | 0 | 21 |
| HELLENIQ PETROLEUM S.A. | 16,622 | 1,670 | 0 | 5 | 84 |
| EKO S.A. | 409 | 47 | 0 | 3 | 51 |
| KALYPSO KEA | 2 | 10 | 0 | 0 | 0 |
| DIAXON | 63 | 10 | 0 | 0 | 2 |
| ASPROFOS | 56 | 16 | 0 | 0 | 2 |
| JUGOPETROL | 11 | 12 | 2 | 1 | 24 |
| EKO CYPRUS | 43 | 36 | 0 | 4 | 0 |
| EKO SERBIA | 38 | 10 | 0 | 0 | 6 |
| EKO BULGARIA | 71 | 11 | 12 | 0 | 67 |
| OKTA | 135 | 47 | 3 | 2 | 12 |
| HELLENIQ ENERGY CONSULTING | 112 | 18 | 0 | 3 | 11 |
| HELLENIQ RENEWABLES | 13 | 2 | 0 | 0 | 1 |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | 0 | 0 | 0 | 0 | 0 |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | 0 | 1 | 0 | 0 | 0 |
| HELLENIQ ENERGY DIGITAL | 171 | 6 | 0 | 0 | 5 |
| HELLENIQ UPSTREAM | 23 | 1 | 2 | 2 | 20 |
| ELPEFUTURE | 4 | 6 | 0 | 1 | 0 |
| ELPET BALKANIKI | 0 | 0 | 0 | 0 | 0 |
| VARDAX | 1 | 0 | 0 | 0 | 0 |
| EKO AFRODITI | 3 | 0 | 0 | 0 | 0 |

11.10.5

'Social dialogue' and 'Collective bargaining' are sustainability matters for S1 covered by ESRS 1-AR 16.



training per year per employee

Average hours of The Group's total training expenditure for 2024 amounted to €1,051,519, while the total number of training hours was 151,853.

> The total amount (EUR) invested in training relates to all Group employees.

Average hours of training per employee category

| Company | Management-level executives | Employees |
|---|--------------------------------|-----------|
| HELLENIQ PETROLEUM S.A. | 50.02 | 57.26 |
| HELLENIQ ENERGY S.A. | 9.24 | 11.33 |
| EKO S.A. | 13.33 | 6.45 |
| KALYPSO KEA | 0 | 6.86 |
| DIAXON | 46.58 | 9.09 |
| ASPROFOS | 7.92 | 32.5 |
| OKTA | 58 | 20 |
| EKO SERBIA | 12.75 | 0 |
| EKO CYPRUS | 36.93 | 42.59 |
| EKO BULGARIA | 42 | 21 |
| JUGOPETROL | 8 | 7.78 |
| HELLENIQ UPSTREAM | 57 | 48.88 |
| HELLENIQ RENEWABLES | 39.2 | 19.99 |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | 0 | 8 |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | 0 | 33.3 |
| HELLENIQ ENERGY CONSULTING | 10.35 | 15.34 |
| ELPEFUTURE | 43 | 11.7 |
| HELLENIQ ENERGY DIGITAL | 3.91 | 35.84 |
| ELPET BALKANIKI | 0 | 0 |
| VARDAX | 0 | 0.5 |
| EKO AFRODITI | 0 | 2.65 |

11.5.5

ESRS E5 E5-5-37 (b), 38



306-4 Average hours of training per year per employee

Average hours of **Average hours of training by gender**

| Company | М | F |
|---|-------|-------|
| HELLENIQ PETROLEUM S.A. | 57.79 | 48.95 |
| HELLENIQ ENERGY S.A. | 9.04 | 10.16 |
| EKO S.A. | 5.22 | 12.36 |
| KALYPSO KEA | 16 | 0 |
| DIAXON | 7.14 | 29.47 |
| ASPROFOS | 23.90 | 41.80 |
| OKTA | 18.07 | 31.13 |
| EKO SERBIA | 14.04 | 20.06 |
| EKO CYPRUS | 41.83 | 41.30 |
| EKO BULGARIA | 23 | 22 |
| JUGOPETROL | 9.50 | 5.50 |
| HELLENIQ UPSTREAM | 62 | 35.89 |
| HELLENIQ RENEWABLES | 24.86 | 25.58 |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | 8 | 0 |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | 42 | 16 |
| HELLENIQ ENERGY CONSULTING | 19.83 | 10.52 |
| ELPEFUTURE | 18.6 | 10 |
| HELLENIQ ENERGY DIGITAL | 32.35 | 30.85 |
| ELPET BALKANIKI | 0 | 0 |
| VARDAX | 0 | 0.5 |
| EKO AFRODITI | 2.65 | 0 |

11.5.5 ESRS E5 E5-5-37 (b),38



404-2 Programs for

upgrading employee skills and transition assistance

programs

Annual Financial Report 2024

(b) ESRS S1 - Own Workforce

By supporting lifelong learning, the Human Resources Division of the Group aims to continuously improve employees' skills by implementing long-term in-house education & training programs that ensure their "continuous employment".

ESRS S1S1-1§AR 11.10.7 17 (h)

> ESRS \$1 \$1-13 §83 (a) and §84

404-3 Percentage of

employees receiving regular performance and career development reviews

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(b) ESRS S1 - Own Workforce

| | | GEN | IDER | CATE | GORY |
|---|-------|------|-------|------|-------|
| COMPANY | TOTAL | М | F | F | Units |
| HELLENIQ PETROLEUM S.A. | 100% | 100% | 100% | 100% | 100% |
| HELLENIQ ENERGY S.A. | 100% | 100% | 100% | 100% | 100% |
| EKO S.A. | 100% | 100% | 100% | 100% | 100% |
| KALYPSO KEA | 100% | 100% | 100% | - | 100% |
| EKO SERBIA | 82% | 84% | 79.3% | 100% | 80% |
| DIAXON | 97.4% | 98% | 93.3% | 97% | 100% |
| OKTA | 90% | 90% | 89% | 83% | 89.8% |
| EKO CYPRUS | 71% | 70% | 73% | 100% | 69% |
| EKO BULGARIA | 38% | 50% | 27% | 100% | 31.7% |
| JUGOPETROL | 93% | 97% | 89% | 85% | 95% |
| ASPROFOS | 100% | 100% | 100% | 100% | 100% |
| HELLENIQ UPSTREAM | 100% | 100% | 100% | 100% | 100% |
| HELLENIQ RENEWABLES | 100% | 100% | 100% | 100% | 100% |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | 100% | 100% | - | - | 100% |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | 100% | 100% | 100% | - | 100% |
| HELLENIQ ENERGY CONSULTING | 100% | 100% | 100% | 100% | 100% |
| ELPEFUTURE | 100% | 100% | 100% | 100% | 100% |
| HELLENIQ ENERGY DIGITAL | 100% | 100% | 100% | 100% | 100% |
| ELPET BALKANIKI | 100% | 100% | - | 100% | - |
| VARDAX | 100% | 100% | 100% | 100% | 100% |
| EKO AFRODITI | 100% | 100% | _ | _ | 100% |

(*) Legal Advisers are excluded from the evaluation process. For foreign subsidiaries, employees with long-term absences > 6 months (illness, maternity etc.) and recruits of the year who have not yet completed their first semester of employment are not included $\,$ in the evaluation process.



Diversity of governance bodies and employees

Human Rights and Equal Opportunities for Employees and Partners

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ESRS S1 - Own Workforce

The table below shows breakdowns relating to the 127 members of the Boards of Directors of the Group companies included in this Report:

| Company | | <30 | 30-50 | >50 | M | F |
|--|--------------------|-----|-------|-------|---|-------|
| HELLENIQ PETROLEUM S.A. | No. | 0 | 2 | 10 | 12 | 0 |
| HELLEINIQ PETROLEUM S.A. | % | 0% | 16.7% | 83.3% | 100% | 0% |
| LIELLENIO ENIEDOVO A | No. | 0 | 1 | 10 | 9 | 2 |
| HELLENIQ ENERGY S.A. | % | 0% | 9.1% | 90.9% | 81.8% | 18.2% |
| EKO C A | No. | 0 | 2 | 7 | 8 | 1 |
| EKO S.A. | % | 0% | 22.2% | 77.8% | 88.9% | 11.1% |
| EKO DI II CA DIA | EUMS.A. No. 0 | 4 | 7 | 0 | | |
| EKO BULGARIA | % | 0% | 42.9% | 57.1% | 100% | 0% |
| EVO CERRIA | No. | 0 | 1 | 4 | 4 | 1 |
| EKO SERBIA | % | 0% | 20% | 80% | 80% | 20% |
| Divide | No. | 0 | 0 | 5 | 4 | 1 |
| EKO BULGARIA EKO SERBIA DIAXON HELLENIQ ENERGY CONSULTING ELPEFUTURE HELLENIQ RENEWABLES S.A. JUGOPETROL OKTA | % | 0% | 0% | 100% | 80% | 20% |
| HELLENIQ ENERGY CONSULTING | No. | 0 | 1 | 4 | 4 | 1 |
| | % | 0% | 20% | 80% | 80% | 20% |
| | No. | 0 | 1 | 3 | 3 | 1 |
| | % | 0% | 25% | 75% | 75% | 25% |
| HELLENIQ RENEWABLES S.A. | No. | 0 | 1 | 4 | 5 | 0 |
| HELLENIQ RENEWABLES S.A. | % | 0% | 20% | 80% | 100% | 0% |
| | No. | 0 | 1 | 6 | 5 | 2 |
| JUGOPETROL | % | 0% | 14.3% | 85.7% | 71.4% | 28.6% |
| | No. | 0 | 2 | 5 | 6 | 1 |
| OKTA | % | 0% | 28.6% | 71.4% | 85.7% | 14.3% |
| | No. | 0 | 1 | 6 | 12 100% 9 81.8% 8 88.9% 7 100% 4 80% 4 80% 3 75% 5 100% 5 71.4% 6 | 1 |
| EKO CYPRUS | % | 0% | 14.3% | 85.7% | 85.7% | 14.3% |
| | No. | 0 | 0 | 7 | 6 | 1 |
| | % | 0% | 0% | 100% | 85.7% | 14.3% |
| EKO CYPRUS | No. | 0 | 0 | 5 | 4 | 1 |
| | % | 0% | 0% | 100% | 80% | 20% |
| | No. | 0 | 0 | 3 | 3 | 0 |
| HELLENIQ ENERGY DIGITAL | % | 0% | 0% | 100% | 100% | 0% |
| | No. | 0 | 2 | 4 | 5 | 1 |
| KALYPSO KEA S.A. | % | 0% | 33.3% | 66.7% | 83.3% | 16.7% |
| | No. | 0 | 0 | 3 | 3 | 0 |
| EKO AFRODITI | % | 0% | 0% | 100% | 100% | 0% |

11.11.5 ESR

ESRS 2 GOV-1 §21 (d); ESRS S1 S1-6 §50 (a); S1-9 §66 (a) to (b); S1-12 §79



405-1 Diversity of governance bodies and employees

| Company | | <30 | 30-50 | >50 | М | F |
|--------------------------|-----|-----|-------|------|------|-----|
| HELLENIQ RENEWABLES WIND | No. | 0 | 1 | 4 | 4 | 1 |
| FARMS OF EVIA S.A. | % | 0% | 20% | 80% | 80% | 20% |
| HELLENIQ RENEWABLES WIND | No. | 0 | 1 | 4 | 4 | 1 |
| FARMS OF MANI S.A. | % | 0% | 20% | 80% | 80% | 20% |
| VARDAX S.A. | No. | 0 | 0 | 5 | 5 | 0 |
| VAKUAA S.A. | % | 0% | 0% | 100% | 100% | 0% |
| FLPET BALKANIKI | No. | 0 | 1 | 3 | 3 | 1 |
| ELPET BALKANIKI | % | 0% | 25% | 75% | 75% | 25% |

11.11.5 ESRS 2 GOV-1 § 21 (d); ESRS S1 S1-6 § 50 (a); S1-9 § 66

(a) to (b); S1-12 §79

405-1 Diversity of governance bodies and

employees

Employee breakdown by age group, gender, nationality:

11.11.5

ESRS 2 GOV-1 §21 (d); ESRS S1 S1-6 §50 (a); S1-9 §66 (a) to (b); S1-12 §79

| | Senior Ma | nagement | All other e | employee | |
|---|-----------|----------|-------------|----------|-------|
| Company | | М | F | M | F |
| HELLENIQ PETROLEUM S.A. | % | 79.2% | 20.8% | 89.9% | 10.1% |
| HELLENIQ ENERGY S.A. | % | 66% | 34% | 50% | 50% |
| EKO S.A. | % | 73% | 27% | 65% | 35% |
| EKO BULGARIA | % | 100% | 0% | 41.3% | 58.7% |
| EKO SERBIA | % | 75% | 25% | 44% | 56% |
| DIAXON | % | 67% | 33% | 87.4% | 12.6% |
| HELLENIQ ENERGY CONSULTING | % | 62% | 38% | 40% | 60% |
| ELPEFUTURE | % | 100% | 0% | 67% | 33% |
| HELLENIQ RENEWABLES S.A. | % | 100% | 0% | 64% | 36% |
| JUGOPETROL | % | 65% | 35% | 55.4% | 44.6% |
| OKTA | % | 50% | 50% | 75.7% | 24.3% |
| EKO CYPRUS | % | 78% | 22% | 64% | 36% |
| ASPROFOS | % | 100% | 0% | 57% | 43% |
| HELLENIQ UPSTREAM S.A. | % | 80% | 20% | 50% | 50% |
| HELLENIQ ENERGY DIGITAL | % | 25% | 75% | 63% | 37% |
| KALYPSO KEA S.A. | % | 0% | 0% | 43% | 57% |
| EKO AFRODITI | % | 0% | 0% | 100% | 0% |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | % | 0% | 0% | 100% | 0% |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | % | 0% | 0% | 66.7% | 33.3% |
| VARDAX S.A. | % | 0% | 0% | 66.7% | 33.3% |
| ELPET BALKANIKI | % | 100% | 0% | 0% | 0% |



405-1 Diversity of governance bodies and employees

| Company | | <30 | 30-50 | >50 |
|---|---|-------|--------|-------|
| HELLENIQ PETROLEUM S.A. | % | 2.5% | 69.1% | 28.5% |
| HELLENIQ ENERGY S.A. | % | 0% | 43% | 57% |
| EKO S.A. | % | 1% | 52% | 47% |
| EKO BULGARIA | % | 17% | 61% | 22% |
| EKO SERBIA | % | 13% | 66% | 21% |
| DIAXON | % | 3.5% | 32.50% | 64% |
| HELLENIQ ENERGY CONSULTING | % | 8.2% | 80% | 11.8% |
| ELPEFUTURE | % | 29% | 71% | 0% |
| HELLENIQ RENEWABLES S.A. | % | 5% | 90% | 5% |
| JUGOPETROL | % | 14.6% | 57.3% | 28.1% |
| OKTA | % | 11% | 56% | 33% |
| EKO CYPRUS | % | 7% | 66% | 27% |
| ASPROFOS | % | 0% | 30% | 70% |
| HELLENIQ UPSTREAM S.A. | % | 0% | 76.2% | 23.8% |
| HELLENIQ ENERGY DIGITAL | % | 10% | 90% | 0% |
| KALYPSO KEA S.A. | % | 14.3% | 85.7% | 0% |
| EKO AFRODITI | % | 0% | 100% | 0% |
| HELLENIQ RENEWABLES WIND FARMS OF EVIA S.A. | % | 0% | 100% | 0% |
| HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | % | 33% | 67% | 0% |
| VARDAX S.A. | % | 0% | 67% | 33% |
| ELPET BALKANIKI | % | 0% | 0% | 100% |

Persons with disabilities account for 0.3%.

405-2 Ratio of basic salary and remuneration of women to men

The Group does not follow any kind of differentiation between men and women in the remuneration system.

Remuneration is based on annual evaluations and follows the Greek, national and EU legislation on equal pay. Based on the principle of equality, there is no discrimination or other financial differentiation in any of the Group companies.

| Country | Total employees | Management executives | All other Employees |
|-----------------------------|-----------------|--------------------------|------------------------|
| Greece | 0.92 | 0.77 | 0.91 |
| Cyprus | 0.85 | 0.93 | 0.95 |
| Republic of North Macedonia | 1.07 | 0.67 | 1.03 |
| Bulgaria | 0.66 | - | 0.82 |
| Serbia | 0.68 | 0.70 | 0.87 |
| Montenegro | 0.85 | 0.84 | 0.95 |

11.11.5

ESRS 2 GOV-1 §21 (d); ESRS S1 S1-6 §50 (a); S1-9 §66 (a) to (b); S1-12 §79

11.11.6 ESRS S1 S1-16 §97 and §98



| 406-1 | Incidents of discrimination and corrective actions taken | Annual Financial Report p.264 | 11.11.7 | ESRS S1 S1-17 §97, §103 (a), §AR 103 | ~ |
|-------|--|---|---------|---|----------|
| 407-1 | Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Annual Financial Report (b) p.247, p.258 | 11.13.2 | 'Freedom of association' and 'Collective | ~ |
| 408-1 | Habitats protected or restored (304-3-a and b) | Annual Financial Report 2024 (b) p.247-251 | - | ESRS S1 §14 (g); S1-1 §22 ESRS S2 §11 (b); S2-1 §18 | ~ |
| 409-1 | Operations and suppliers at significant risk for incidents of forced or compulsory labor | Annual Financial Report 2024 (b) p.247-251 | 11.12.2 | ESRS S1 §14 (f); S1-1 §22 ESRS S2 §11 (b); S2-1 §18 | ✓ |
| 410-1 | Security personnel trained in human rights policies or procedures | Annual Financial Report 2024 (b) p.123 | 11.18.2 | 'Security-related impacts' is a sustainability matter covered for S3 covered by ESRS1§AR16. | ✓ |
| 414-1 | New suppliers that were screened using social criteria | In 2024, the Group Procurement Department extended the adoption of the new digitized procurement processes that were designed in 2023. As per the new registration and pre-qualification framework, the new suppliers handled by the Group Procurement Division are screened prior to the onboarding. Additionally, after the onboarding process and in partnership with EcoVadis, we conduct the respective individual sustainability assessment of our key supply chain partners. In 2024 we initiated this action with some of our existing and most critical suppliers. The screening covers seven pillars: Regulatory & Legal Framework (Ariba) Labor & Human Rights (Ariba & EcoVadis) Ethics (EcoVadis) Sustainable Procurement (EcoVadis) Environmental & Social Framework (Ariba & EcoVadis) Financial Framework (Ariba) Operational Framework (Ariba) | 11.10.8 | ESRS G1 G1-2 §15 (b) | ~ |



| 414-1 | New suppliers that were screened using social criteria | In 2024, 124 new suppliers (100%) were onboarded and screened through Ariba platform and 25 of our suppliers were assessed from EcoVadis. The process continues with all new and existing Suppliers. For those already screened, automatic alerts are in place to notify Procurement about changes in status. | 11.10.8 | ESRS G1 G1-2 §15 (b) | ✓ |
|-------|--|---|---------|--|----------|
| 414-2 | Negative social impacts in the supply chain and actions taken | Annual Financial Report 2024 p.137 In 2024, 53 suppliers were assessed for social impacts via ECOVADIS. From this assessment no significant findings were identified. | 11.10.9 | ESRS 2 SBM-3 §48 (c) i and iv | ✓ |
| 411-1 | Incidents of violations involving rights of indigenous peoples | Annual Financial Report 2024 (b) p.267-271 HELLENiQ ENERGY does not operate in areas adjacent to indigenous communities, so no incidents of violation of their rights has been occurred or been reported. | - | ESRS \$3 \$3-1 §16 (c), AR 12; \$3-4 §30, §32 (b), §33 (b), §36 | ~ |



Business Ethics, Compliance and Transparency

| Stan dard | Disclosures & Requirements | Cross - reference & Data | GRI sector standard | CSRD (ESRS interoperability/ assurance) | GRI assurance |
|--------------|--|---|---------------------------|--|------------------|
| 205-2 | Communicat ion and training on anti-corruption policies and procedures | Annual Financial Report p. 122 All employees (100%) are informed of the Group's anti-corruption policies and procedures through the current Internal Labor Regulations and the Group's Code of Conduct. All employees (100%) have been informed about the Group's commitment to the UNGC principles, corporate policy and values through the Sustainability Statement (all publications are posted on the intranet). All employees have been given a printed version of the Group's Code of Conduct, which makes specific reference to corruption issues and provides specific examples to avoid, while a special elearning course has been developed for all employees. Consequently, all 3,734 employees (100%) in the countries where the Group operates have received corruption-related training. In addition, 11 members of the Board of Directors (100%) of the parent company based in Greece have received corruption training. In addition, the Code of Conduct is also provided in the form of an e-learning course, accessible to all Group employees. Regarding partners, communication is ensured through the inclusion in the contracts of a clause concerning commitment to the principles of the UN Global Compact. The Group's Code of Conduct, which includes anti-corruption policies, has been communicated to 100% of our associates. | 11.20.3 | ESRS G1 G1-3-20-21-(b)-AR 7-8 See GRI 205-1 | |
| 205-3 | Confirmed incidents of corruption and actions taken | In 2024, there were no reported incidents of corruption in the Regulatory Compliance Office or the Management of the Group companies. Zero monetary loss. | 11.20.4 | ESRS G1 G1-4-25 | ~ |



| 206-1 | Legal actions for anticompetitive behavior, anti- trust, and monopoly practices | There have been no court appeals relating to anti-competitive behavior, creation of trusts and engaging in monopoly practices. Zero monetary loss. | 11.19.2 | ~ |
|-------|--|--|---------|----------|
| 207-1 | Approach to tax | i. HELLENiQ Energy has a general Tax Strategy which is publicly available and applies to all Group entities. The relevant reference is included in the publicly available UK Tax Strategy, which is required by law and is disclosed in the Group's site, please see link: uk-tax-strategy-report-2024.pdf ii. The executive position in charge within the organization is Group Tax and Customs Division (GT&CD), which is centrally based in the parent entity, located in H/O in Greece. All tax and customs operations/matters, both in Greece and internationally, are centrally overlooked, supervised and coordinated by the GT&CD daily. All issues are closely monitored, also on a monthly, quarterly, semi-annually and annually basis. The GT&CD has a clear and full view and conduct of all tax and customs affairs, both at an entity and functional level, in all jurisdictions where the Group operates. | 11.21.4 | ✓ |



| 207-1 | Approach to tax | Main tasks include: | 11.19.2 |
|-------|-----------------|---|---------|
| | | - Overall Tax & Customs compliance, in continuous/open cooperation and communication with the competent authorities and internal/external auditors. | |
| | | - Advisory to all entities/functions regarding all relevant issues. | |
| | | - Tax planning and optimization, through active and continuous tax cashflow monitoring. | |
| | | - Conduct of all Tax & Customs audits in all Group companies, following all necessary action, including support throughout the litigation process when necessary. For the Greek entities, all tax aspects are confirmed by the Companies certified auditors, within the annual Tax Certificate process. | |
| | | - Follow up and adoption of the relevant provisions of the changing tax and customs regime, at an international level and local level in Greece, providing proposals and instructions where required. | |
| | | - Investigating potential opportunities, of inclusion of investment plan projects, in Incentive/Development Law provisions. | |
| | | iii. We seek to comply with all applicable regulations, legislation and reporting requirements and tax and customs payment obligations. We have developed suitable controls and processes to ensure these are met accurately and on a timely basis. Issues that arise are handled timely and successfully and if necessary, they are escalated and dealt at the appropriate level, to ensure adequate response, through to the Group CFO and then to the Group CEO if required. | |
| | | HELLENiQ Energy applies high standards of tax and customs compliance and is committed to monitoring and applying all applicable laws, rules and regulations in meeting the Group's tax and customs compliance and reporting responsibilities in all jurisdictions where the business operates and ensuring that appropriate actions are applied to meet those obligations. | |
| | | | |



| 207-1 | Approach to tax | iv. We seek to comply with all applicable regulations, legislation and reporting requirements, as well as tax and customs payment obligations. We optimize the tax position of the Group by applying the relevant applicable provisions, also by investigating potential opportunities, of inclusion of investment plan projects, in Incentive Law provisions. We act with integrity, full transparency and optimization of the relevant resources, to be efficient with our tax affairs and whilst we make use of available reliefs and allowances, our primary focus remains to ensuring compliance with all relevant tax and customs laws and practices. Our aim is to successfully support the business, through compliance, awareness and ensuring the lawful, normal and efficient operation of the Group. Tax issues have a key impact not only quantitatively but also qualitatively, are also related to the Group's reputation and social profile, for instance optimizing and supporting the Corporate Social Responsibility activities. During the development of Group 's tax strategy, the economic and social impacts are seriously and responsibly been considered. | 11.19.2 | > |
|-------|--|--|---------|-------------|
| 207-2 | Tax governance, control, and risk management | A. A description of the tax governance and control framework, including: i. Day-to-day management of tax and customs matters rests with the Head of the relevant affaires Senior Group Tax & Customs Director and local experts, if required, to identify and manage tax risks according to Group policies and to monitor changes in the tax and customs framework. Following tax assessment of all issues and any potential tax impact to the Companies, the GT&CD takes any necessary measures. The Senior Group Tax & Customs Director reports to the Group Chief Finance Officer ("CFO"), who reports to the Chief Executive Officer ("CEO") of the Group, reporting to the Board of HelleniQ Energy Holdings SA, being the parent company of HP Group. ii. Group Tax & Customs function provides expert opinions within the Group and tax clearance through analysis from a tax and/or customs perspective. It acts as tax & customs internal consultant for the Group, assessing all issues, following up with all legislation and keeping updated all stakeholders on a timely basis, ensuring tax awareness within the Group providing additionally relevant proposals and guidelines. | 11.21.5 | > |



207-2 Tax governance, control, and risk management

A. A description of the tax governance and control framework, including:

Through high professional standards, GT&CD seeks to ensure payment of taxes and relevant obligations when due, in line with the clear and firm intention to be in full compliance with all tax and customs legislative requirements. We achieve this by:

- acting with integrity, full transparency and optimization of the relevant resources;
- meeting statutory obligations/deadlines;
- providing training and guidance within the Group, acting as internal tax and customs advisers considering jointly tax strategy, business strategy, and development.

iii. We do not engage in any aggressive tax planning across the HelleniQ Energy Group, always taking into consideration our corporate policies, values and codes. We follow a conservative approach to tax risk and we strive to keep tax risk at the lowest level. Maintaining compliance is paramount and we aim to comply with both the spirit and letter of the law with regards to our tax and customs affairs.

Where risks are identified, we ensure appropriate action is taken to mitigate those risks, when required and reduce the level of risk to an acceptable minimum. If required, we use external advisers to provide tax technical advice and additional resources based on an assessment of risks and requirements.

We follow generally accepted risk management principles and best practice, that are applied to tax and we ensure the right communication, integration and adaptation of these principles across the organization.

iv. There are various reporting/audit tools which we have developed, according to the relevant provisions, to evaluate and follow up compliance and control from a tax perspective within the Group.

Tax Certificates - All Greek companies falling within the ambit of the relevant process, are annually undergoing specific audit process by their statutory auditors, obtaining unqualified Tax Certificates, confirming tax compliance for the Group companies, without material or even immaterial tax findings reported. In 2023 the relevant tax certificates, were obtained for 41 Greek liable entities.



207-2 Tax

Tax governance, control, and risk management **Transfer Pricing files** – Local TP files per entity/country are prepared and submitted annually, centrally coordinated by Group Tax & Customs Department. Intragroup transactions are closely monitored using additional valuation assessment through benchmarking analysis. In 2023, 51 relevant files were prepared.

HELLENIQ ENERGY Group TP Masterfile is in line with the framework provided under the OECD Guidelines and the Greek TP rules aiming at achieving consistency and compliance with the said framework.

The Masterfile provides a high-level overview of the Group's business, operations and intercompany transactions (ICTs) and aims to support the documentation according to the Group's TP policies within the global economic, financial and tax content and it is shared with the Group's affiliates abroad and if required with the auditors.

External advisors perform a thorough review and support to the Group during the update of the informative sections of each Local TP file, which provides an overview of the relevant affiliates, as well as an analysis of the functions, risks and assets (tangible/intangible) that are relevant to the ICTs of each relevant affiliate and how such functions, assets and risks affect and are allocated between the affiliated counterparties.

International TP files are submitted in each local language, while they are also prepared in English, to facilitate review centrally at corporate level.

Country by Country Reporting – The Group timely prepares and submits annually the CbCR tables with the intragroup transactions detailed information to the Greek Tax Authorities (since the Parent entity of the Group is incorporated and resident in Greece) within the CbCR requirements and according to the relevant process, also it depicts the relevant consolidated data for the Group at country level. In 2023 the said report refers accordingly to 71 entities in 10 countries/jurisdictions where the Group operates.

The information contained in the CbCR reflects the guidelines so far provided by the OECD and the Greek authorities in this regard, being in line with those submitted every year.

The relevant CbCR notifications are submitted to each jurisdictional authority on an annual basis. All relevant ratios and data are consolidated at a country level.



207-2 Tax governance, control, and risk management

Changes in the applicable relevant laws are closely followed up centrally by the Group Tax & Customs Department who provides internal guidelines for all entities and functions of the Group.

B. Description of reporting mechanisms regarding unethical or illegal conduct and the integrity of the organization in relation to taxation

The GT&CD ensures appropriate action is taken to mitigate tax risks when required and reduce the level to the acceptable minimum. If required, external advice is seeked as well as additional resources, if necessary, based on assessment of risks and requirements.

To date no examples of unethical or unlawful behavior with regards to tax and/or customs issues have been identified to report.

Within the framework provided by the relevant Law 4624/2019, FEK A' 137/29-8-2019, for the integration of the corresponding EU Directive 2016/680, on the protection of persons reporting breaches of Union law, which applies to the Group from fiscal year 2024 onwards, there is no specific reference or provision for tax related matters. Regarding these specific matters, the framework applied is the one provided in the Tax Procedure Code and the Customs Code accordingly.

C. Description of the assurance process for tax disclosures and, where applicable, reference to the assurance report, statement or opinion

We have developed suitable controls and processes to ensure these are met accurately and on a timely basis:

- If any unintentional error in tax is identified, we seek to take any corrective action at the earliest opportunity, and
- We respond with full transparency and integrity to any enquiries from Tax and/or Customs Authorities on a timely basis. All main / significant tax and customs issues are specifically disclosed in the Financial Statements notes, which are also cleared by the certified auditors of the Group.

Note: The tax data used in the preparation of this GRI Report is for 2023, as this is the latest tax data available as of the date of this report.



207-3 Stakeholder engagement and management of concerns related

to tax

Description of the approach to tax-related stakeholders, which includes:

11.21.6

ncludes:

i. The approach to cooperation with the tax authorities

Regular and Interim audits are performed from the relevant authorities for tax & customs issues confirming compliance with the existing framework.

The tax framework and practices in Greece, which determine the tax base for the transactions of the Group's main entities, may result in inherent uncertainties, due to its complexity and it being subject to changes and alternative interpretation by relevant authorities at different points in time and across different entities. Where a tax audit results in a different assessment to the one adopted by the Group entity, and for which the Group after consideration, disagrees with, the process for resolving the issue is usually through a court of law proceeding, which has many stages and can take a considerable number of years to reach its final and irrevocable ruling.

ii. The public consultation approach in the field of taxation

The Senior Group's Tax & Customs Director actively participates in relevant bodies, in order to be informed on a timely basis about any change in the relevant framework and promptly provide suggestions in the context of public advocacy of new laws.

More specifically:

- 1. Hellenic Petroleum Marketing Companies Association (SEEPE) Coordinator of the Supply & Customs Committee
- 2. Hellenic Federation of Enterprises (SEV) Member of the Taxation Committee
- 3. American Hellenic Chamber of Commerce Member of the Taxation Committee
- 4. International Fiscal Association (IFA) Member
- 5. Consultation Committee of the Hellenic Accounting and Auditing Standards Oversight Board (ELTE) Member



| 207-3 | Stakeholder engagement and management of concerns related to tax | iii. The procedures for collecting and considering the views of stakeholders, including external stakeholders There are both internal and external processes that enable stakeholders to participate in this engagement. Internally, the GT&CD provides expert opinions and guidelines within the Group, in all entities and jurisdictions, also tax clearance from tax and/or customs perspective acting as tax & customs internal consultant, ensuring proper guidelines are provided keeping updated all stakeholders on a timely basis, ensuring tax awareness within the Group. | 11.21.6 | > |
|-------|--|---|---------|-------------|
| | | Externally, regular audits are performed by the relevant authorities on tax & customs issues, where the GT&CD provides full support and cooperation. Where a tax audit results in a different assessment to the one adopted by the Group and for which the Group, after consideration, disagrees with, the process for resolving the issue is usually through court proceedings, while pending litigations are evaluated regularly by the relevant legal advisers and are assessed on a quarterly basis as per legal advice provided. Note: The tax data used in the preparation of this GRI Report is for 2023, as this is the latest tax data available as of the date of this report. | | |



207-4

Country-bycountry reporting

A. All tax jurisdictions in which the entities included in the organization's audited consolidated financial statements or financial information filed in the public record are tax resident. B. For each taxing jurisdiction listed in Publication 207-4-a: i. Names of the permanent entities ii. Primary activities of the organisation iii. Number of employees and basis for calculating this number iv. Revenue from third party sales v. Income from intra-group transactions with other tax jurisdictions vi. Profit/loss before tax vii. Tangible assets other than cash and cash equivalents viii. Corporate income tax paid on a cash hasis ix. Corporate income tax arising from the results x. Reasons for the difference between the corporate income tax arising from the results and the tax due, if the statutory tax rate is applied to the profit/loss before tax. C. The time period covered by the informatión referred to in

disclosure 207-4.

With regard to the items in points A & B, please find below the relevant CbCR tables (fiscal year 2023, the 2024 table is in the process of being prepared and will be finalized and submitted within the relevant deadlines) for your reference and convenience.

These tables shall be prepared and submitted to the competent authority on an annual basis, in accordance with OECD legislation and guidelines, together with the relevant disclosures, submitted by entity and jurisdiction. With respect to item B-(x), please note that any difference between the corporate income tax arising on profits/losses and the tax due arises from the difference in accounting and tax basis, in accordance with the specific provisions applicable in each jurisdiction. For example, there may be different treatment for deductibility/recognition of expenses, carry forward of tax losses, recognition of income, etc.

All amounts are in Euro.

| Tax authority | Revenue from non- related parties | Revenue from Related Parties | Total Revenue | Profit Before Tax |
|-----------------|--------------------------------------|---------------------------------|-------------------|-------------------|
| Albania | 0.00 | 0.00 | 0.00 | -58,000.00 |
| Austria | 470,000.00 | 0.00 | 470,000.00 | -12,116,743.00 |
| Bulgaria | 298,927,800.00 | 0.00 | 298,927,800.00 | 3,163,850.00 |
| Cyprus | 416,490,630.53 | 211,646,672.96 | 628,137,303.49 | 17,221,195.16 |
| North Macedonia | 798,577,000.00 | 1,685,000.00 | 800,262,000.00 | 3,536,000.00 |
| Greece | 12,371,806,456.57 | 5,141,304,990.28 | 17,513,111,446.85 | 603,903,946.92 |
| Montenegro | 252,019,898.99 | 529,249.21 | 252,549,148.20 | 8,266,608.88 |
| Netherlands | 0.00 | 0.00 | 0.00 | -171,000.00 |
| Serbia | erbia 209,187,420.00 | | 209,187,420.00 | 1,868,070.00 |
| United Kingdom | 295,000.00 | 18,738,000.00 | 19,033,000.00 | 4,573,000.00 |
| Grand Total | 14,347,774,206.09 | 5,373,903,912.45 | 19,721,678,118.54 | 630,186,927.95 |

| Tax authority | Income Tax paid | Income Tax calculated at tax rates applicable to profits | Share Capital & Share Premium | Retained Earnings |
|-----------------|-----------------|--|----------------------------------|-------------------|
| Albania | 0.00 | 0.00 | 14,968,000.00 | -22,291,651.00 |
| Austria | 470,000.00 | 0.00 | 196,237,645.00 | 16,981,038.07 |
| Bulgaria | 747,509.00 | 470,000.00 | 30,846,450.00 | 11,526,485.57 |
| Cyprus | 2,691,113.94 | 2,581,152.00 | 236,234,508.40 | 52,080,414.21 |
| North Macedonia | 1,753,687.00 | 458,000.00 | 40,423,000.00 | 38,310,000.00 |
| Greece | 380,519,368.28 | 189,033,692.76 | 2,566,961,110.08 | 2,022,988,723.17 |
| Montenegro | 2,067,158.64 | 1,191,991.18 | 67,987,000.00 | 32,752,061.57 |
| Netherlands | 0.00 | 0.00 | 144,189,000.00 | 133,699,000.00 |
| Serbia | 506,735.00 | 534,960.00 | 56,746,000.00 | -10,032,075.00 |
| United Kingdom | 972,462.00 | 412,000.00 | 16,284,000.00 | 13,870,920.00 |
| Grand Total | 389,258,033.86 | 194,681,795.94 | 3,370,876,713.48 | 2,289,884,916.60 |



207-4 Count

Country-bycountry reporting

A. All tax jurisdictions in which the entities included in the organization's audited consolidated financial statements or financial information filed in the public record are tax resident. B. For each taxing jurisdiction listed in Publication 207-4-a: i. Names of the permanent entities ii. Primary activities of the organisation iii. Number of employees and basis for calculating this number iv. Revenue from third party sales v. Income from intra-group transactions with other tax jurisdictions vi. Profit/loss before tax vii. Tangible assets other than cash and cash equivalents viii. Corporate income tax paid on a cash basis ix. Corporate income tax arising from the results x. Reasons for the difference between the corporate income tax arising from the results and the tax due, if the statutory tax rate is applied to the profit/loss before tax C. The time period covered by the information referred to in disclosure 207-4.

| Tax authority | No. of employees | Fixed assets (PPE+Inventory) |
|-----------------|------------------|---------------------------------|
| Albania | 0.00 | 119,70.00 |
| Austria | 0.00 | 0.00 |
| Bulgaria | 70.00 | 79,676,300.00 |
| Cyprus | 79.00 | 199,206,528.88 |
| North Macedonia | 266.00 | 35,371,257.82 |
| Greece | 3,506 | 5,197,988,215.28 |
| Montenegro | 107.00 | 66,861,919.81 |
| Netherlands | 0.00 | 0.00 |
| Serbia | 49.00 | 50,693,190.00 |
| United Kingdom | 0.00 | 0.00 |
| Grand Total | 4,077 | 5,629,917,117.79 |

C. The above CbCR table refers to the financial year 2023.

Regarding items B-(i) and B-(ii), a summary table of all Group entities and their relevant activity (reference year 2023), which make up and form the above table, is provided, while for 2024 the procedures and deadlines foreseen will also be followed, based on the new acquisitions, mergers and transformations in the Group:

| S/N | Group entity | Group entity Business activity | |
|-----|--|--|--------|
| 1 | HELLENIQ ENERGY HOLDINGS SOCIETE ANONYME | Holding Company | Greece |
| 2 | Hellenic Fuels and Lubricants Industrial and Commercial S.A | Trade of oil products | Greece |
| 3 | Kalypso KEA SA | Retail trade of liquid fuels & LPG in Greece | Greece |
| 4 | Kalypso KEA SA | Construction and operation of fuel storage facilities | Greece |
| 5 | Vardax SA | Operation of Crude Oil pipeline (Thesaloniki to RNM) | Greece |
| 6 | DIAXON SA | Provision of manufacturing services to HELPE | Greece |
| 7 | ELPET BALKANIKI S.A. | Holding company - Construction and operation of a crude oil pipeline | Greece |
| 8 | HELLENIQ RENEWABLES SINGLE MEMBER S.A. | Production, distribution and trading of renewable energy sources | Greece |
| 9 | ENERGIAKI SERVION S.A. | Production, distribution and trading of renewable energy sources | Greece |
| 10 | Energiaki Pylou Methonis | Production, distribution and trading of renewable energy sources | Greece |
| 11 | HELLENIQ ENERGY CONSULTING S.A. | Provision of consulting services to Group affiliates | Greece |
| 12 | ASPROFOS S.A. | Engineering services | Greece |



207-4

Country-bycountry reporting

A. All tax jurisdictions in which the entities included in the organization's audited consolidated financial statements or financial information filed in the public record are tax resident. B. For each taxing jurisdiction listed in Publication 207-4-a: i. Names of the i. Names of the permanent entities ii. Primary activities of the organisation iii. Number of employees and basis for calculating this number iv. Revenue from third party sales v. Income from intra-group transactions with other tax jurisdictions vi. Profit/loss before tax vii. Tangible assets other than cash and cash equivalents viii. Corporate income tax paid on a cash basis ix. Corporate income tax arising from the results x. Reasons for the difference between the corporate income tax arising from the results and the tax due, if the statutory tax rate is applied to the profit/loss before tax. C. The time period covered by the information referred to in disclosure 207-4.

| S/N | Group entity | Business activity | Jurisdiction |
|-----|--|--|--------------|
| 13 | ATEN Energy SA | Production, distribution and trading of renewable energy sources | Greece |
| 14 | EKO Ira Maritime Company | Vessel-owning company | Greece |
| 15 | EKO Afroditi Maritime Company | Vessel-owning company | Greece |
| 16 | HELPE PATRAIKOS S.A. | Exploration and production of hydrocarbons | Greece |
| 17 | HELPE UPSTREAM S.A. | Exploration and production of hydrocarbons | Greece |
| 18 | HELPE WEST KERKYRA S.A. | Exploration and production of hydrocarbons | Greece |
| 19 | HELPE SEA OF THRACE S.A. | Exploration and production of hydrocarbons | Greece |
| 20 | HELPE E&P HOLDINGS S.A. | Holding company of the Group's Exploration & Production of Hydrocarbons activity | Greece |
| 21 | HELPE WEST CRETE S.A. | Exploration and production of hydrocarbons | Greece |
| 22 | HELPE SW CRETE S.A. | Exploration and production of hydrocarbons | Greece |
| 23 | HELPE IONIO S.A. | Exploration and production of hydrocarbons | Greece |
| 24 | HELPE KIPARISSIAKOS GULF S.A. | Exploration and production of hydrocarbons | Greece |
| 25 | ELPE FUTURE | DISTRIBUTION OF ELECTRICITY | Greece |
| 26 | Kozilio 1SA | Production, distribution and trading of renewable energy sources | Greece |
| 27 | Helpe Renewable Wind Farms of Evia SA | Production of electricity (Wind park) | Greece |
| 27 | HELLENIQ ENERGY DIGITAL S.A. | Information technology developments | Greece |
| 28 | HELLENIQ ENERGY DIGITAL S.A. | Information technology developments | Greece |
| 29 | Tanagra Solar Energy SA | Production, distribution and trading of renewable energy sources | Greece |
| 30 | S AETHER Energy Single Member SA | Production, distribution and trading of renewable energy sources | Greece |
| 31 | Hellenic Petroleum Single Member Societe Anonyme Refining, Supply and Sales of Oil Products and Petrochemicals | Refining and trade of oil products | Greece |
| 32 | FENSOL S.M. | Production, distribution and trading of renewable energy sources | Greece |
| 33 | HELLENIQ ENERGY REAL ESTATE S.A. | Investment company | Greece |
| 34 | HELLENIQ RENEWABLES WIND FARMS OF MANI S.A. | Production of electricity (Wind park) | Greece |
| 35 | WINDSPUR Energy | Production of electricity (Wind park) | Greece |
| 36 | JUGOPETROLAD | Distribution of oil products in Montenegro | Montenegro |



207-4

Country-bycountry reporting

A. All tax jurisdictions in which the entities included in the organization's audited consolidated financial statements or financial information filed in the public record are tax resident. B. For each taxing jurisdiction listed in Publication 207-4-a: i. Names of the i. Names of the permanent entities ii. Primary activities of the organisation iii. Number of employees and basis for calculating this number iv. Revenue from third party sales v. Income from intra-group transactions with other tax jurisdictions vi. Profit/loss before tax vii. Tangible assets other than cash and cash equivalents viii. Corporate income tax paid on a cash basis ix. Corporate income tax arising from the results x. Reasons for the difference between the corporate income tax arising from the results and the tax due, if the statutory tax rate is applied to the profit/loss before tax. C. The time period covered by the information referred to in disclosure 207-4.

| S/N | Group entity | Business activity | Jurisdiction |
|-----|--|--|-----------------|
| 37 | HELLENIQ ENERGY BULGARIA HOLDINGS LIMITED | Holding company | Cyprus |
| 38 | HELLENIQ ENERGY SERBIA HOLDINGS LIMITED | Holding company | Cyprus |
| 39 | R.A.M.OIL Cyprus LTD | Distribution of oil products in Cyprus | Cyprus |
| 40 | SUPERLUBE LTD | Owner and management of pipeline and tank rentals | Cyprus |
| 41 | HELLENIQ ENERGY CYPRUS HOLDINGS LIMITED | Holding Company | Cyprus |
| 42 | EKO LOGISTICS LTD | Management and operation of a fuel terminal at the Vassiliko area (Cyprus) | Cyprus |
| 43 | HELPE RENEWABLES CYPRUS LIMITED | Holding company | Cyprus |
| 44 | HELPE ENERGY FINANCE CYPRUS LIMITED | Financing activities | Cyprus |
| 45 | FENSOL HOLDING LIMITED | Holding company | Cyprus |
| 46 | EKO ENERGY CYPRUS LTD | Production, distribution and trading of renewable energy sources | Cyprus |
| 47 | EKO GAS LIMITED (ex Blue Circle) | Distribution of LPG in Cyprus | Cyprus |
| 48 | HELLENIQ ENERGY INTERNATIONAL GmbH | Holding company of Group's International subsidiaries | Austria |
| 49 | HELLENIQ ENERGY FINANCE PLC | Financing activities | UK |
| 50 | EKO CYPRUS LTD | Distribution of oil products in Cyprus | Cyprus |
| 51 | EKO CYPRUS LTD (branch) | Distribution of oil products in Cyprus | UK |
| 52 | EKO BULGARIA EAD | Distribution of oil products in Bulgaria | Bulgaria |
| 53 | EKO SERBIA AD | Distribution of oil products in Serbia | Serbia |
| 54 | GLOBAL ALBANIA SA | Distribution of oil products in Albania | Albania |
| 55 | OKTA CRUDE OIL REFINERY AD | Distribution of oil products in RNM | North Macedonia |
| 56 | ELPEDISON BV | Holding company | Netherlands |
| 57 | ELPEDISON S.A | Energy trading | Greece |
| 58 | HELLENIC PETROLEUM (UK) LIMITED | Holding company | UK |
| 59 | ASPROFOS S.A - Branch Albania | Engineering services | Albania |
| 60 | VARDAX - Branch FYROM | Operation of Crude Oil pipeline | North Macedonia |
| 61 | HELLENIQ RENEWABLES CYPRUS LYTHRODONTAS LIMITED | Production of electricity | Cyprus |



| 7-4 | Country-by- country | S/N | Group entity | Business activity | Jurisdiction | 11.21.7 | ~ |
|-----|----------------------------|--|--|---|--|---------|---|
| | reporting | 62 | HELLENIQ RENEWABLES CYPRUS AGIA VARVARA LIMITED | Production of electricity | Cyprus | | |
| | | 63 | HELLENIQ RENEWABLES CYPRUS ALAMINOS LIMITED | Production of electricity | Cyprus | | |
| | | 64 | HELLENIQ RENEWABLES CYPRUS ALAMINOS LIMITED | Production of electricity | Cyprus | | |
| | | 65 | HELLENIQ RENEWABLES CYPRUS PAPHOS LIMITED | Production of electricity | Cyprus | | |
| | | 66 | HELLENIQ RENEWABLES CYPRUS POLITIKO LIMITED | Production of electricity | Cyprus | | |
| | | 67 | EKO ENERGY PARTNERS | Production of electricity | Cyprus | | |
| | | 68 | RES ZEUS ELECTRICITY COMPANY LIMITED | Production of electricity | Cyprus | | |
| | | 69 | SOLIGHT ELECTRICITY COMPANY LIMITED | Production of electricity | Cyprus | | |
| | | 70 | FRONTERA ENERGIAKI SA | Production of electricity | Cyprus | | |
| | | 71 | KOZILIO PRIME | Production of electricity | Cyprus | | |
| 5-1 | Political contributions | engag entitie As par throug | rt of its sustainable developm gh engaging in organizations, | ontributions to political part ent strategy, it works with s associations and bodies. Th | ties, persons or takeholders ne Group | 11.22.2 | |
| i-1 | | engag entitie As par throug suppo organi follow Fuels | ement issues and prevents cos. To fits sustainable developm | ontributions to political part ent strategy, it works with s associations and bodies. The verning bodies and commit asiders its active participatio | ties, persons or takeholders ne Group tees of the on in the | 11.22.2 | ` |
| 5-1 | | engag entitie As par throug suppo organi follow Fuels • CSR | ement issues and prevents cas. It of its sustainable development of the engaging in organizations, orts and participates in the good izations/associations and continuous as part of it in the section of | ontributions to political part ent strategy, it works with s associations and bodies. The verning bodies and commit asiders its active participatio | ties, persons or takeholders ne Group tees of the on in the | 11.22.2 | • |
| 5-1 | | engag entitie As par throug suppo organi follow Fuels • CSR | ement issues and prevents of es. It of its sustainable development of the engaging in organizations, orts and participates in the go izations/associations and coning organizations as part of it CAVVE (scientific section of the Europe) Europe | ent strategy, it works with s associations and bodies. Th verning bodies and commit isiders its active participation s strategy for sustainable d European Relinery Association | ties, persons or takeholders ne Group tees of the on in the | 11.22.2 | |
| ;-1 | | engag entitie As par throug suppo organi follow Fuels • CSR • eFue | ement issues and prevents of es. It of its sustainable development of the engaging in organizations, orts and participates in the good izations/associations and continuous of the section of the sectio | ent strategy, it works with s associations and bodies. Th verning bodies and commit isiders its active participation s strategy for sustainable d European Relinery Association | ties, persons or takeholders ne Group tees of the on in the | 11.22.2 | • |
| 5-1 | | engagentities As parthrougentransporter (a) and a control of the contro | ement issues and prevents cas. It of its sustainable development of its sustainable development of its and participates in the good izations/associations and control of its and participates part of its section of the | ent strategy, it works with s associations and bodies. The verning bodies and commit isiders its active participations strategy for sustainable de European Refinery Association | ties, persons or takeholders ne Group tees of the on in the | 11.22.2 | |
| 5-1 | | engage entitie As par through suppo organi follow Fuels CSR Euro HYD Inter | ement issues and prevents cas. It of its sustainable development of its sustainable development of the engaging in organizations, orts and participates in the good izations/associations and continuous as part of it (AVE) (Scientific section of the seurope) Europe I Alliance pean Fuel Manufacturers Association Fuel Manufacturers Associations and continuous as part of its section of the seurope. | ent strategy, it works with s associations and bodies. The verning bodies and commit isiders its active participations strategy for sustainable de European Refinery Association | ties, persons or takeholders ne Group tees of the on in the | 11.22.2 | |
| 5-1 | | engage entities As part through suppo organi follow Fuels CSR Euro HYD Inter UN C | ement issues and prevents cas. It of its sustainable development and engaging in organizations, orts and participates in the good izations/associations and confine organizations as part of it (Schemulic Section of the Seurope) Europe I Alliance pean Fuel Manufacturers Association (IFA) | ent strategy, it works with s associations and bodies. The verning bodies and commit usiders its active participation strategy for sustainable de European Refinery Association | ties, persons or takeholders ne Group tees of the on in the evelopment: | 11.22.2 | |
| 5-1 | | engage entities As part through suppo organi follow Fuels CSR Euro HYD Inter UN C | ement issues and prevents cas. It of its sustainable development of its sustainable development of its sustainable development of its and participates in the good izations/associations and continuous continuous as part of its section of the secti | ent strategy, it works with s associations and bodies. The verning bodies and commit usiders its active participation strategy for sustainable de European Refinery Association | ties, persons or takeholders ne Group tees of the on in the evelopment: | 11.22.2 | |



| 415-1 | Political contributions | Global Sustain | 11.22.2 | ✓ |
|-------|-------------------------|---|---------|----------|
| | Contributions | Hellenic Wind Energy Association (HWEA/ELETAEN) | | |
| | | Hellenic Institute of Electric Vehicles (EL.IN.H.O.) | | |
| | | SEV Environment and Health & Safety Committees | | |
| | | SEEEPE - Hellenic Petroleum Marketing Companies Association | | |
| | | SEV Business Council for Sustainable Development | | |
| | | Hellenic Association of Chemical Industries (HACI) | | |
| | | Exporters' Association of Northern Greece | | |
| | | Please see also GRI 2-28. | | |
| | | | | |



Risk Prevention and Management

| 205-1 | Operations assessed for risks related to corruption | Annual Financial Report D. 122 In preparing the annual are shall consider compliance Corruption issues are also 100% of the Group's orgarelated risks, following a stand the process is also in Audits carried out in 2024 in the application of the Group's organic the application organic the application organic the application of | e issu con nizat stand line v | ies al sider ciona ardiz with not i | nd pl red w I unit zed ir the G | an composted and composite and | oliance iductir reened nspect lode of signific | e-related audits. ng many audits. d for corruption- tion process, f Conduct. cant deviations | 11.20.2 | ESRS G1 G1-3-AR 5 | ~ |
|-------|--|---|---|--|---|--|---|---|----------------------------|---|----------|
| 306-3 | Total number and volume of significant spills | Annual Financial Report p. 122 Significant spills | AIC | EIC | TIC | SUBSIDIA | Units | Comments | 11.8.2 | Pollution of air', 'Pollution of water', and 'Pollution of soil' are sustainability | ~ |
| | | Significant spills | AIC | EIC | IIC | RIES* | Units | Comments | ls ly ct ere y | matters for E2 | |
| | | Total number of significant spills to soil or surface and groundwater. (Oil, Fuel, Waste and chemical spills) | 0 | 0 | 0 | 0 | # | A significant spill is any hydrocarbon spill greater than 100 bbls that could potentially | | covered by ESRS 1 AR 16. | |
| | | Number of non-compliances from spills | 0 | 0 | 0 | 0 | # | have environmental impacts due to direct contact with soil or water. It does not include spills that were | | | |
| | | Volume of significant spills | 0 | 0 | 0 | 0 | bbl | directly contained by the measures in place and had no impact on the environment. | | | |
| | | The evolution of the PSER index, inclu 2024 ESRS S1 - Own Workforce and in | _ | | | nted in deta | il in Annu | ual Financial Report | | | |



| Stan dard | Disclosures & Requirements | Cross - | GRI sector standard | CSRD (ESRS interoperability/ assurance) | GRI assurance | | | | |
|--------------|---|---|--|--|--------------------------------|---|----------|---|---|
| OG13 | Number of process safety events, per business activity | The most significant F concern two major cat and management of n and b) design. The comprevent their recurrence equipment, better emand continuous safety | egories, such as naintenance org rective actions t ce were the rep ployee training | s: a) equip ganization taken to a lacement in equipn | oment rend scholaress to defee | eliability heduling them and ctive | y 11.8.3 | - | ~ |
| | | Installation | HELLENIQ PETROLEUM (AIC, EIC, TIC) | ЕКО | ОКТА | TOTAL | | | |
| | | Process Safety Events (PSE-1) | 1 | 0 | 0 | 1 | | | |
| | | Process Safety Events (PSE-2) | 6 | 0 | 1 | 7 | | | |
| | | Total Process Safety Events (PSE) | 7 | 0 | 0 | 8 | | | |
| | | PSER-1 | 0.15 | 0.00 | 0.00 | 0.06 | | | |
| | | PSER-2 | 0.89 | 0.00 | 0.90 | 0.40 | | | |
| | | Total PSER | 1.04 | 0.00 | 0.90 | 0.46 | | | |
| | | | | | | | | | |



Assurance Statement (No. 20000250015291)



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Information on the Assurance Statement for HELLENiQ ENERGY's Sustainability Reporting Table 2024

The Assurance Provider TÜV AUSTRIA Hellas ("the Provider") has been engaged to provide external assurance on the disclosures published in the Sustainability Reporting Table 2024 ('the Table') of HELLENiQ ENERGY HOLDINGS S.A. ("the Company"). The Company is exclusively responsible for the data and information within the Table. The assurance process was conducted by the Provider in terms of sample-based audits of data and information, as well as audits of data collection systems and procedures.

The Provider has not offered any consulting services to the Company.

Economic and financial data were not verified. Instead, they were assessed with respect to the information contained in the 2024 annual financial statement (where applicable) which has been verified by other third parties.

The intended users of this Statement are all the stakeholders of the Company.

Scope of Assurance

The Provider undertook and implemented the following verification activities during June and July of 2025:

- 1. Review of the Table against the requirements of:
 - ☑ GRI Standards 2021 (in accordance with) including GRI 11. Oil & Gas Sector Standards and verification of its compliance with all nine requirements set out in section 3 of GRI 1.
 - AA1000 Accountability Principles Standard 2018 (Type 2 and moderate level of quality assurance activities, according to AA1000 Assurance Standard (AA1000AS v3).
- 2. Verification of the data included in all the chapters of the Table.
- 3. Use of remote audits technics, including interviews with the Sustainability Team and the main executives of the Company's Head Offices in Maroussi and its refineries located in Aspropyrgos, Elefsina, Thessaloniki and Diaxon, and sampling inspections of files, in order to evaluate:
 - ☑ the reliability and accuracy of performance indicators of the Sustainability Reporting Table
 - M the processes for generating, gathering, and managing information included in the Reporting Table
 - Metadherence to the principles of inclusivity, materiality, and responsiveness to stakeholders.

Limitations

The extent of the above collected data and information justify the characterization «moderate assurance», since the objective evidence found was a result of internal sources of the Company and not through contacting external stakeholders.

Conclusions

TÜV AUSTRIA HELLAS 429, Mesogeion Ave. GR-153 43 Athens, Greece www.tuvaustriahellas.gr GEMI No.: 1650201000

This Verification was conducted in accordance with TÜV AUSTRIA auditing and Verification procedures. Every page of this statement is valid, only if it is accompanied with the rest pages of the statement.

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Assurance Statement (No. 20000250015291)



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During the assurance engagement, it was confirmed that the data and information of all the chapters of the Reporting Table are accurate and reliable. The accuracy of the disclosed statements and assertions was found to be within acceptable limits. The Company provided a comprehensive and proper presentation of performance based on reasonably documented information as well as that there is an effective data gathering, management and reporting system in place for issues which pertain to sustainable development.

The Provider concurs that the Table is in accordance with the GRI Standards 2021, including GRI 11. Oil & Gas Sector Standards and the 4 principles of the AA1000AP Standard (2018).

Opportunities for Improvement

Based on the observations and concluding remarks derived from the assurance engagement, the Provider's recommendations for the improvement of the Company's future Sustainability Reporting Tables are as follows:

© GRI-STANDARDS & AA1000AP (2018):

Harmonize the procedures and data collection systems of all companies within the boundaries of the Table

Statement of Independence, Impartiality and Competence

TÜV AUSTRIA Hellas member of TÜV AUSTRIA Group is an independent professional services company that specializes in quality, environmental, health, safety and social accountability. The TÜV AUSTRIA Group is a Group with International presence founded in 1872. TÜV AUSTRIA Hellas was the first subsidiary to be founded outside Austria in 1994, has become a market leader in Greece. Its assurance team has extensive experience in conducting verification over environmental, social, ethical and health and safety information, systems and processes.

TÜV AUSTRIA Hellas is an accredited certification body which operates a Quality Management System which complies with the requirements of several accreditation standards and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

TÜV AUSTRIA Hellas has implemented a Declaration of Impartiality and Independency and several relevant procedures which ensure that all employees, that work for or on behalf of it, maintain high standards in their day-to-day business activities. We are particularly cautious in the prevention of conflicts of interest. TÜV AUSTRIA Hellas has a few existing commercial contracts with the Company regarding management systems certification activities. Our assurance team does not have any involvement in other projects with the Company that would cause a conflict of interest and has never provided any consulting services to the Company.

Note: This Independent Assurance Report has been prepared as a translation of the original Greek version.

On behalf of TÜV AUSTRIA Hellas, Athens, 29 July 2025

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Assurance Statement (No. 20000250015291)



Chrysagi Evdokia Lead Verifier Ioannis Kallias General Manager

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