



Climate Change Policy

February 2025

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CONTEXT

Climate change refers to issues arising from the long-term shifts in temperature, weather patterns, and atmospheric conditions that exceed scientifically proven thresholds, leading to sustainability challenges for ecosystems, including humans.

The company "Attica Holdings S.A." (hereinafter referred to as "the Company" and together with its 100% subsidiaries, jointly referred to as "the Group") acknowledges the need to actively participate, to the extent applicable to the Group, in the reduction of greenhouse gas emissions from its activities. The Group recognizes that climate change could have an impact on its operations, supply chain, stakeholders, and on the local communities where it operates and provides services. At the same time, the Group views climate change as an opportunity for innovation, strengthening its resilience, and advancing the transition to a more sustainable economy.

CLIMATE CHANGE FRAMEWORK

Climate change is often considered and examined within the context of environmental issues; however, it stands apart in the following ways:

- Climate change requires analyses, actions, and commitments with a long-term horizon spanning decades, which demands a specialized approach.
- Climate change constitutes a global issue and is closely linked to the management of the impact of greenhouse gas emissions on the planet.
- International agreements, EU regulations, and sustainability standards have established a global goal of achieving net-zero greenhouse gas emissions by 2050, as outlined in the Paris Agreement. Additionally, the European Union has set a target to reduce emissions by 55% by 2030 compared to 1990 levels.

EU Directives such as the European Climate Law, the Emissions Trading System (EU ETS), the Fit for 55 package, and the Corporate Sustainability Reporting Directive (CSRD), necessitate the development and adoption **of a separate Climate Change Policy for the Group (hereinafter referred to as the "Climate Change Policy" or 'Policy')**, which is outlined in this document.

PURPOSE

This Policy aims to provide a framework for: a) managing and reducing climate change factors influenced by the Group's activities, and b) addressing the risks and opportunities associated with climate change. The Group's goal is, on the one hand, to comply with the relevant guidelines and, on the other hand, to actively contribute through its actions and initiatives to achieving international, national, and sectoral goals for reducing or/and eliminating the impacts of climate change.

Specifically, this Policy serves the following specific objectives:

- The reduction of the environmental/carbon footprint and contribution to mitigating the effects of climate change through the adoption of sustainable practices, the reduction of greenhouse gas emissions, the continuous improvement in energy efficiency, and the effective management of resources.
- The enhancement of resilience and sustainability against the impacts of climate change, through effective risk management, while simultaneously achieving better economic and environmental performance.
- The increase of competitiveness using alternative technologies and more environmentally friendly solutions.
- The creation and leveraging of opportunities through pioneering initiatives and innovative action, which open new business prospects for the Group in the context of mitigating climate impacts and gaining market recognition for the Group's efforts.

SCOPE OF APPLICATION

The present Climate Change Policy:

- Applies to the entire Group.
- Binds all members of the Board of Directors, senior management, employees, and, in general, all individuals working within the Group, whether under an employment contract or any other contractual agreement.
- Extends to all third parties providing services to the Group (supply chain) or acting on its behalf (including partners, suppliers, intermediaries, and any other entities collaborating with the Group under outsourcing contracts or other agreements).
- Covers all Group activities, both in Greece and internationally, including all operations carried out by the Group or by third parties acting on its behalf or in collaboration with it (value chain).

The regulations, the commitments and the principles included in any other relevant Policy or Code adopted and implemented by the Group remain in force and are applied alongside this Policy.

BASIC PRINCIPLES

To fulfill its commitment to climate action, the Group adheres to the following principles, which will be gradually implemented across all its activities. Specifically, the Group:

- has already developed an environmental strategy and a Decarbonization Roadmap.
- has set and reviews, when deemed necessary, short-term, medium-term and long-term targets for greenhouse gas emissions reduction.

- integrates climate change issues into internal strategic planning and decision-making processes, as well as into the analysis, management, and reporting of short-term, medium-term, and long-term risks.
- promotes awareness and further education on climate change among the Group's employees, as well as among its upstream and downstream stakeholders in its value chain.
- publicly supports its contribution to the key milestones of the global climate agenda, adopting positions aligned with the Group's goals and its existing Sustainable Development Policy.
- Encourages the participation of the private sector in the global agenda for climate change, to achieve the Paris Agreement goals, particularly the goal of limiting the global average temperature rise.
- develops methodologies for the assessment and design of adaptation measures and takes appropriate mitigation actions to address the impacts of climate change.
- implements green certifications and audits, applying the Environmental Management System in accordance with ISO 14001 for its vessels and facilities. At the same time, aiming to identify improvements in vessel efficiency, the Group conducts an annual calculation of the Carbon Intensity Indicator (CII) and the Energy Efficiency Existing Ship Index (EEXI), which are part of the IMO regulations aimed at reducing the carbon footprint of shipping and promoting sustainability in maritime activities.
- conducts regular training for its employees on legislations changes, new technologies, and best practices for emissions reduction and fuel and energy management.
- promotes awareness and education among passengers and customers on environmental and sustainable development issues, including climate change.

It is important to note that climate change initiatives and actions largely depend on the financial resources available to the Group, along with investors' willingness to support these plans.

MANAGEMENT AND ADAPTATION TO THE IMPACTS OF CLIMATE CHANGE

For more effective adaptation to the potential impacts of climate change and to ensure full alignment with regulatory requirements, the Group has developed a structured and comprehensive methodology for identifying and managing climate change-related risks and opportunities.

In this context, the Group:

- evaluates the current situation, identifies, quantifies, and prioritizes climate risks and opportunities based on their impact on financial results and its financial position.
- Utilizes climate data from external databases for its areas of operation.
- examines both internal and external data for identifying short-term and medium-to-long-term risks/opportunities and develops forecasting models that enable monitoring of developments and the setting of realistic targets.

- develops scenarios based on various trajectories of global warming to better understand future challenges and regularly conducts scenario analysis to assess potential impacts and develop or adjust action plans. These scenarios help shape the Group's business strategy and financial planning.
- ensures that processes are in place to prevent or address the impacts caused by climate change and to leverage any opportunities that may arise.
- incorporates climate change and extreme weather events into enterprise risk management processes and business continuity plans.
- collaborates with port authorities to help strengthen the resilience of the ports where the Group operates, against potential climate risks.
- develops emergency plans to address significant disruptions caused by extreme weather events and ensures that employees and crew members are adequately trained and prepared for such situations.
- prepares and publishes periodic reports within the framework of the 'Responsibility and Sustainable Development Report' and the 'Sustainability Report', annually or more frequently if significant changes or new requirements arise, ensuring transparency and consistency in monitoring the progress on climate change risk/opportunity management.

IMPACT MONITORING INFORMATION SYSTEM

To facilitate and carry out the various monitoring functions related to climate change issues, the Group uses a specialized information system. The process involves the input of data through automatic or manual entries, such as risks, opportunities, indicators, and goals, with the capability to connect to external databases for additional information not stored within the Group. The data is stored in a database organized into related tables and can be processed using traditional management methods. Additionally, forecasting models are developed, utilizing artificial intelligence and machine learning where possible, to estimate future conditions. Finally, reports are generated in electronic format. The information system for climate change monitoring is essential, as it helps in recording and analyzing climate change issues and variables. It can rapidly execute complex forecasting scenarios and alternative solutions for the future, support informed decision-making, ensures transparency and traceability of targets and updates over time, and enhances communication with the public and stakeholders regarding the Group's efforts to address this global challenge.

STRATEGIC GOALS AND PRIORITIES

As part of the Group's strategy for addressing climate change, which is outlined in this Policy, specific strategic goals and priority areas have been established and will continue to be set in the future.

Specifically:

- I. **Greenhouse Gas Emissions Reduction:** The Group by adopting the Decarbonization

Roadmap aims to reduce the intensity of greenhouse gas emissions.

- II. **Improvement of Energy Efficiency:** The Group aims to install technologies for energy efficiency enhancement and upgrading.
- III. **Utilization of alternative energy sources:** To reduce the use of fossil fuels and promote clean energy, the Group aims to install photovoltaic systems on its ships and in its hotel facilities. Additionally, it seeks to utilize environmentally friendly alternative fuels.
- IV. **Digital Transformation and Technological Innovation:** The Group aims to implement digital solutions (such as sensors for data collection and corresponding analysis systems) to enhance the monitoring of energy data and improve the efficiency and operation of its ships.
- V. **Partnerships, particularly with government agencies:** As addressing climate change cannot be achieved solely through the Group's actions, there is ongoing communication and collaboration with agencies that can make a significant contribution to promoting and implementing measures to mitigate the impacts of climate change. The Group aims to maintain continuous cooperation with these entities to advance projects that cannot be carried out solely by the Group and may require the allocation of funds to support and subsidize climate change initiatives by other parties.

Some goals may not be feasible to evaluate with quantitative criteria. In such cases, the Group will draw attention to this and inform stakeholders and readers of the Responsible and Sustainable Development Reports' and the 'Sustainability Reports' that these specific objectives have not been assessed using quantitative criteria.

IMPLEMENTATION, MONITORING AND MODIFICATION

The monitoring of the implementation of the climate change Policy is the responsibility of the Chief Executive Officer at the Board level, the Chief Administrative, Transformation and Sustainability Officer at the Management level, and the Sustainability, Transformation & Risk Management Department at the organizational level. In this context, the Internal Audit Department contributes by conducting scheduled audits throughout the year. As a result of these audits, reports are prepared to update the Board of Directors.

To address climate change issues, the organizational structure of the Group has been implemented, with each business unit responsible for monitoring and reporting on matters within its scope, such as the Marine, Commercial, and Financial Services.

The current Policy will be periodically reviewed, at least once every two years.

The climate change Policy is maintained online and is available on the corporate website under the section: [attica-group.com/ Sustainability & Responsibility/ Responsible & Sustainable Development](http://attica-group.com/Sustainability%20&%20Responsibility/Responsible%20&%20Sustainable%20Development).