



Stakeholder Engagement Policy

October 2026

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1. Introduction

Attica Holdings S.A. (hereinafter the “Company”) and the subsidiaries included in the scope of this Policy (hereinafter, collectively, the “Group”) adopt strategies that incorporate stakeholders’ views into the Group’s business practices, aiming to align these with its sustainability and competitiveness needs.

Considering the above, stakeholder engagement and dialogue is an important part of the Group’s activities. Stakeholders are defined as individuals or groups that can affect or be affected by the Group’s activities, business relationships and, more broadly, its operations. Through the appropriate processes for providing information, communication, consultation and collaboration, the Group seeks to understand stakeholders’ views, aspirations, needs and expectations and to assess the issues that arise.

This Stakeholder Engagement Policy (hereinafter the “Stakeholder Engagement Policy” or the “Policy”) sets out in detail the principles and the framework applied by the Group for the identification and meaningful engagement of stakeholders. In developing and implementing this Policy, the Group takes into consideration the applicable regulatory and legislative framework, the relevant requirements of the European Sustainability Reporting Standards (ESRS) and internationally recognized principles for stakeholder engagement, such as the principles of the International Association for Public Participation (IAP2) and the AA1000 Stakeholder Engagement Standard 2015.

2. Purpose

The purpose of this Policy is to establish a common framework for communication and consultation with stakeholders.

More specifically, the Policy aims to:

- safeguard the inclusive, timely and meaningful participation of stakeholders, particularly those who are or may be affected by the Group’s activities and value chain;
- identify and assess stakeholder views, interests, needs and expectations;
- consider stakeholder views, aspirations, needs and expectations in the identification and assessment of actual and potential impacts, risks and opportunities;
- consider stakeholder views, aspirations, needs and expectations when designing the Group’s strategy, business model, policies, actions and related targets;
- define, depending on the purpose and subject matter of each process, the responsibilities, appropriate level of participation, channels, frequency and methods of communication and consultation;
- provide feedback to stakeholders, where appropriate;
- monitor and assess the effectiveness of engagement processes with a view to their continuous improvement; and
- foster relationships of trust, transparency and collaboration with the Group’s stakeholders.

3. Scope and Governance

This Policy is applicable at Group level (to the Company and its subsidiaries) and is addressed to the Group’s Management, executives and employees who participate in communication and consultation processes with stakeholders.

The Policy covers the Group’s activities in Greece and abroad, as well as engagement with stakeholders associated with its activities, business relationships and value chain.

4. Stakeholder Overview

The Group seeks to maintain systematic and appropriate communication with stakeholders, with the aim of understanding their views, aspirations, needs and expectations in relation to its activities. Stakeholders are identified and assessed, taking into consideration, among other factors, how and to what extent they are or may be affected by the Group's activities and business relationships, their degree of dependence on the Group and their ability to influence its operations and the achievement of its objectives. Stakeholder mapping is periodically reviewed and updated when material changes arise in the Group's activities, business relationships or operating environment.

As part of the consultation process, consideration is also given to the needs of groups that may face difficulties participating in the process or accessing information. Where necessary, appropriate means of communication are selected to facilitate stakeholder participation in the process.

The Group has identified the main categories of stakeholders and, for each category, has defined specific communication channels, the main issues of concern and the way the Group responds to related requests and concerns. The above is presented in detail in the Appendix to this Policy and is updated based on the periodic stakeholder mapping.

5. Fundamental Principles of Stakeholder Engagement

The Group and its Management is committed to applying the following fundamental principles when engaging with stakeholders:

- **Inclusion and accessibility:** the Group seeks to ensure the meaningful participation of stakeholders in processes concerning decisions and actions that affect or may affect them. Special attention is paid to groups and individuals who may face barriers to participation or access to information.
- **Clarity:** the purpose and subject matter of the engagement are communicated to participants from the outset, together with information on how their views are expected to be used.
- **Consistency:** stakeholder engagement processes are implemented consistently across the Group and are adapted, where necessary, to the characteristics, needs and ability of stakeholders to participate.
- **Timely participation:** where feasible and appropriate, engagement takes place at a stage where stakeholder views can be considered before the relevant decisions are finalized.
- **Integrity and transparency:** engagement is conducted with honesty, objectivity and respect, without misleading practices, undue influence or pressure and with clear information on the subject matter and limitations of the process.
- **Data protection and confidentiality:** personal data and confidential information collected or provided as part of the engagement process are processed in accordance with the applicable legislative and regulatory framework and the relevant Group policies.
- **Protection against adverse treatment and retaliation:** the Group does not tolerate adverse treatment or retaliation against individuals due to their participation in good faith in an engagement process or due to the expression in good faith of their views and concerns. Reports of potential violations and the related protection of reporting persons are governed by the Group's Policy and Procedure for the Submission and Investigation of Reports and the applicable legislative framework.

6. Planning and Implementation of the Stakeholder Engagement Process

The form and the extent of stakeholder engagement are determined taking into consideration how and to what extent stakeholders are affected, the nature and significance of the matters under consideration and their needs and ability to participate.

Prior to the beginning of each planned stakeholder engagement process, the purpose, subject matter, intended level of participation, participants, communication methods and channels, timeframe and the organizational unit or executive responsible for its implementation are determined, as appropriate.

At the outset of the engagement process, the Group informs participants of its subject matter, the issues that remain open for discussion and those on which decisions have already been made, as well as how their views will be used. The aim is to set realistic expectations and meaningfully incorporate stakeholder views into matters where there is scope for them to influence the decision.

The views and key issues that emerge during the engagement process are recorded, assessed and communicated to the relevant departments of the Group so that these can be taken into consideration in decision-making and in planning the related actions.

Following the completion of a planned stakeholder engagement process and where feasible and deemed necessary, the Group provides stakeholders with feedback on the key issues raised, the outcomes of the process and how their views were assessed or taken into consideration. Such information may be provided within a reasonable timeframe and through appropriate and accessible communication channels.

7. Communication Channels

The communication channels and the minimum communication frequency for each stakeholder group are set out in detail in the Appendices to this Policy. The Group uses, where relevant, additional means of communication when required by the subject matter or the needs of the participants.

8. Stakeholder Engagement Groups

With regards to matters requiring broader participation, the Group may establish stakeholder engagement groups comprising representatives of stakeholders relevant to the matter concerned. The composition and operating arrangements of these groups are determined based on the subject matter and the needs of the engagement process and are defined by the organizational unit or executive responsible for the engagement. Participation in stakeholder engagement groups is open to stakeholders who express an interest in the relevant matter, to the extent that their participation contributes to ensuring that the group composition is representative in relation to the matter under consideration.

9. Decision-Making Process

The views and interests of stakeholders are taken into consideration alongside the other factors considered by the Group in its decision-making process. Stakeholder engagement contributes to understanding the actual and potential impacts the Group's decisions and activities may have on stakeholders and, where necessary, to the appropriate adjustment of the relevant actions.

10. Communication Channels and Grievance Mechanisms

In addition to the stakeholder engagement processes, the Group has established specific communication channels through which stakeholders may, depending on their capacity and the nature of the matter, submit enquiries, requests and complaints. The main communication channels for each stakeholder category are presented in detail in the Appendix to this Policy.

Through the above channels, stakeholders may submit enquiries, requests, comments and complaints, depending on the circumstances. Matters submitted through these channels are reviewed by the relevant organizational units of the Group in accordance with the applicable procedures and, where necessary, appropriate measures are taken.

Separately from the above channels, individuals within the scope of the Group's Policy and Procedure of Whistleblowing Reports may submit reports, either with their identity disclosed or anonymously, concerning violations covered by the Policy and Procedure through the designated reporting channels. The receipt, handling and investigation of reports, communication with the reporting person, maintenance of confidentiality and protection against retaliation are governed by the aforementioned Policy and Procedure and the applicable legislative framework.

The issues and trends identified through the above channels are taken into consideration, where relevant and to the extent permitted by confidentiality and personal data protection requirements, when identifying and assessing actual and potential impacts, risks and opportunities, including the Double Materiality Assessment.

11. Policy Approval, Review and Amendments

The Stakeholder Engagement Policy enters into force immediately upon its approval by the Chief Administration, Transformation and Sustainability Officer and the Chief Executive Officer (CEO). The Policy is developed and revised, where necessary, by the Sustainability, Transformation and Risk Management Department to take into consideration changes in the regulatory framework, the Group's activities or the relevant procedures. Any amendment is approved by the Chief Administration, Transformation and Sustainability Officer and the Chief Executive Officer (CEO) and is appropriately documented. The Policy remains in force until it is revised and is available on the Group's corporate website, under the "Responsible & Sustainable Development" section (attica-group.com).

Appendix – Stakeholder Engagement Table

STAKEHOLDER GROUPS	COMMUNICATION CHANNELS	FREQUENCY	KEY CONCERNS	GROUP RESPONSE
Employees (total workforce)	• Employee satisfaction survey • Performance Management System • Information meetings and events • Trainings • Intranet • Whistleblowing mechanism • Ship Safety Committees • Command visits on board ships • Targeted crew research • Trainings and drills • "Improving the Best" Handbook	• Survey: every 1-2 years • Performance appraisal: annually • Other channels: continuously • Safety Committees: monthly and ad hoc	• Job security • Training and development • Health and safety • Working and living conditions and benefits • Personal and professional life balance • Equality and equal treatment • Relations between employees and management • Internal communication • Human rights and related complaints	• Integration of findings into training planning and HR practices • Maintaining Responsibility as one of the 6 evaluation criteria • Investigation of each report through the reporting mechanism, with protection against retaliation • Informing employees about the results of the survey and the actions that follow
			• Health and safety at sea • Working and living conditions • Hours, rest and embarkation • Implementation of MLC and sectoral collective bargaining agreements • Training and certifications • Personal protective equipment • Ship and Office communication	• Examination of issues at the monthly meetings of the Security Committees and documentation of decisions • Integration of findings into the Health and Safety strategy of the relevant Team • Provision of the necessary equipment and continuous training
Customers (Passengers / Freight Transport Customers)	• Qualitative and Quantitative Ferry Transport Survey • Satisfaction questionnaires • Customer Service Department and complaints handling • Websites and applications • Social media • Information leaflets and signage on board vessels	• Surveys: every 2–3 years • Customer service and complaints handling: ongoing, with an annual consolidated analysis	• Passenger safety • Reliability and punctuality of ferry services • Adequacy of ferry services outside the tourist season • Fare affordability • Accessibility for people with disabilities or reduced mobility • Quality and hygiene of products and services • Responsible communication and sales • Privacy and security of personal data • Personal belongings security	• Incorporating findings into service design and investments in vessels and facilities • Maintaining accessibility infrastructure for persons with disabilities and the discount policy by route and destination • Responding to every complaint through the Customer Service Department • Operating a certified Information Security Management System and complying with the GDPR

STAKEHOLDER GROUPS	COMMUNICATION CHANNELS	FREQUENCY	KEY CONCERNS	GROUP RESPONSE
Shareholders	• General Meeting (annual and as needed) • Financial results briefings • Investor relations website • Meetings and presentations	• Financial results briefings: every six months • General Meeting: annually • Other channels: as needed	• Financial performance and business continuity • Corporate governance • ESG performance and progress towards sustainability targets • Climate risks and transition costs • Financial transparency • Information Systems security	• Publishing an annual Sustainability Statement and Sustainable Development Report • Answering questions at the General Meeting and financial results briefings • Disclosing short-, medium- and long-term targets, including greenhouse gas emissions targets
Investors and Creditors	• Meetings and presentations • ESG questionnaires and assessments • Websites • Formal Communication	As needed	• Business continuity and financial strength • Financial transparency • ESG performance and third-party assessments • Exposure to climate and transition risks • Financing fleet renewal	• Providing timely, evidence-based responses to ESG questionnaires • Incorporating recurring questions into the content of the Sustainability Statement
Business Partners (e.g. Sales Network, Travel Agents)	• Network Satisfaction Survey • Value Chain Survey • Events and meetings • Travel agent portal • Information systems • Training and briefings	• Survey: every 2–3 years • Training and meetings: annually	• Commercial policy and terms of cooperation • Quality of products and services • Responsible communication and sales • Flow of information to the end customer • Operational and technical support • Compliance with competition law	• Providing training and briefings to develop the sales network's skills • Upgrading systems and the portal based on satisfaction survey findings
Suppliers	• Value Chain Survey • Supplier assessment and reassessment • Meetings with key suppliers • Tendering procedures and contracts	• Assessment: annually • Meetings: annually or as needed	• Selection criteria and terms of cooperation • Responsible procurement and procurement from domestic suppliers • Supply of fuels and alternative fuels • Shipbuilding and repair, dry-docking • Assessment of labor practices, human rights and environmental matters	• Applying the Suppliers' and Partners' Code of Conduct • Implementing the procedure that facilitates cooperation with small and medium-sized enterprises and local suppliers • Incorporating findings into selection and reassessment criteria
Port Authorities and Port Management Bodies	• Meetings and presentations • Discussions with representatives • Formal communication • Cooperation on port infrastructure projects	Annually for each relevant port and as needed for each project	• Safety in port areas • Availability and suitability of berths • Impacts of accidents and incidents • Shore-side electricity supply to vessels • Management of ship-generated waste • Traffic congestion and boarding times	• Participating in the joint planning of port infrastructure projects • Complying with each port's waste reception and handling plans

STAKEHOLDER GROUPS	COMMUNICATION CHANNELS	FREQUENCY	KEY CONCERNS	GROUP RESPONSE
Regulatory Authorities	- Formal communication and submission of data - Vessel inspections - Participation in public consultations - Meetings and presentations	As needed and in accordance with regulatory deadlines	- Passenger safety and safety of navigation - Approval of ferry routes and sailing schedules - Public service contracts - Marine pollution and fuel spills - Climate regulatory framework (EU ETS, FuelEU Maritime) - Impacts of accidents - Compliance with competition law	- Ensuring full and timely compliance with regulatory requirements and reporting obligations - Participating in public consultations with evidence-based positions, without exerting undue influence
Local Communities (Local Authorities and Regional Authorities)	- Qualitative and Quantitative Ferry Transport Survey - Local information meetings - Project feedback groups - Contact point for local issues - Social Support Program	- Surveys: every 2–3 years - Local meetings: annually for each geographical area - Project-specific engagement: throughout each project	- Connectivity and adequacy of ferry services, particularly outside the tourist season - Affordable fares - Impact on the local community and economy - Noise disturbance and vessel wash - SOx, NOx and particulate matter emissions in ports - Waste management - Sponsorships, donations and volunteering - Complaints about impacts on communities	- Identifying, assessing, managing and remediating potential or actual negative impacts - Providing discounted tickets to meet the travel needs of organizations, associations and island residents - Implementing social programs and supporting local organizations - Informing participants of the outcome of each consultation
Maritime Community (Ports and Port Authorities, Government Bodies, NGOs and Trade Unions)	- Participation in industry associations and organizations - Meetings and presentations - Discussions with representatives at national and European level	Annually and as needed	- Passenger safety and safety of navigation - Impacts of accidents and sharing of good practices - Climate transition and alternative fuels - Fleet renewal and financing - Crewing and availability of seafarers	- Sharing expertise and participating in joint industry initiatives - Participating in research programs to reduce air pollutant emissions
Media	- Press releases - Press conferences - Websites - Formal communication in the event of incidents	As needed, and immediately in the event of an incident	- Passenger safety - Incident management and impacts of accidents - Marine pollution and fuel spills - Investments in new vessels and fleet renewal - Sustainability performance - Reliability and transparency of communication	- Providing timely, accurate and evidence-based information, particularly in the event of incidents - Ensuring that communication materials are fair, lawful and truthful and do not perpetuate stereotypes