

Revision: October 2024

The Ellinikon

Stakeholder
Engagement
Plan

LAMDA Development
/ Greece



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Acronyms and Abbreviations

EBRD	European Bank for Reconstruction and Development
EIA/ EIS	Environmental Impact Assessment / Environmental Impact Study
ELL	Law 4062/2012 on the Utilisation of the former Ellinikon Airport
EMP	Environmental Management Plan
E&S	Environmental and Social
ESP	EBRD Environmental and Social Policy
ESAP	Environmental and Social Action Plan
EU	European Union
JMD	Joint Ministerial Decision
PD	Greek Presidential Decree
PRs	EBRD Performance Requirements
SEP	Stakeholder Engagement Plan
SEA	Strategic Environmental Assessment
SEIS	Strategic Environmental Impact Study
SPA	The share purchase agreement between Hellenic Republic Asset Development Fund S.A. and the Company relating to the purchase of 100% of the shares of Hellinikon SA, as ratified by the Greek Parliament on 28.05.2021

PURPOSE AND OBJECTIVE

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) has made an equity investment in LAMDA Development S.A. (the “Company”) participating in the EUR 650 million share capital increase that took place in December 2019 and participating in the EUR 230 million share in Green Bond in 2021. Funds raised will support the financing of the first phase of The Ellinikon, one of the largest urban regeneration projects in Europe, which is intended to regenerate the Athens’ former international airport site and adjacent coastal front into a unique ecosystem with smart city principles and sustainable infrastructure.

This document in hand is the Stakeholder Engagement Plan (SEP) for the Project, which is part of the Disclosure Package.

Stakeholder Engagement refers to a process of sharing information and knowledge, seeking to understand and respond to the concerns of others and building relationships based on collaboration. Stakeholder consultation and disclosure are key elements of engagement and essential for delivery of successful projects.

The overall aim of this SEP is to ensure that a timely, consistent, comprehensive, coordinated and culturally appropriate approach is taken to consultation and project related information disclosure. It is intended to demonstrate the commitment of LAMDA Development to an ‘international best practice’ approach in line with national requirements and EBRD’s Environmental and Social Policy (ESP) (2019) Performance Requirements (PR) 10.

The SEP defines the stakeholder engagement process including stakeholder identification and mapping, engagement, information disclosure, consultation meetings and public participation. This revision (October 2024) reflects the developments which have taken place since June 2020, including the commencement of construction activities in 2021.

This SEP is a living document, which will be amended and updated in the course of Project planning and implementation.

PROJECT DESCRIPTION AND IMPACT

The Ellinikon is one of the largest urban regeneration projects in Europe, a multidimensional development on the Athens Riviera designed by the world-renowned firm Foster + Partners. The groundbreaking development project is unique in Europe for its location on the historic grounds of the former International Airport in Athens, each size, as well as its potential.

The 6,200,000 m² of Athens' former international airport site that stood idle for 20 years and adjacent coastal front will be transformed into a unique ecosystem comprising several distinct communities, each with its own character; 8,000 new homes, luxury hotels, retail destinations, workplaces, sports and recreational facilities, hospitality venues, a 310-berth marina, entertainment hubs, a 1 km sandy beach, cultural destinations, health and educational facilities.

The project aims to seamlessly blend the region's natural allure and distinctive attributes with smart city principles and sustainable infrastructure. A true 15-minute city at the crossroads of East & West, boasting one of Europe's best climates and international connectivity, just 30 minutes from the airport.

At the western edge of The Ellinikon, the 3,5 km of coastline will be upgraded and enhanced for public enjoyment. And in the center of it all resides the 2,000,000 m² Park, one of the largest coastal parks in the world and a showcase for Greek heritage and biodiversity.

Throughout the project, climate positive design will reduce energy use, increase energy efficiency, and minimize environmental footprint. The districts will be connected by walkable, bikeable pathways, while electric vehicle charging facilities will be available throughout the development. The Ellinikon will also integrate the most advanced 'smart city' technologies from the ground up, delivering improved safety, more efficiency, and a better quality of life.

The Ellinikon is now the area for an expansion of Athens and the upcoming benchmark for future living in Greece. The aim is to enhance Athens as a touristic destination attracting more than 1 million visitors from all over the world every year, a business center, as well as a recreation area. It is noted that in full operation the project is expected to create 85,000 jobs.

For more information, please visit The Ellinikon website: <http://www.theellinikon.gr>

03

NATIONAL AND EU REQUIREMENTS

This SEP is prepared in consideration of the following standards:

- Applicable local, national and regional regulatory requirements, including relevant EU legislation related, but not limited to:
 - the EIA legislation;
 - The EBRD's Environmental and Social Policy (ESP) (2019) and the Stakeholder Engagement relevant Performance Requirements; and
 - EBRD's Grievance Management, Guidance Note (2012).

3.1 National and EU requirements

The Greek national legislation on Stakeholder Engagement activities includes the following:

- The Hellinikon Law (No.4802/2021)-Contribution Agreement & Special Contribution Diagram
- The Hellinikon Law (No.4062/2012)-(Government Gazette (GG) 70/A/2012-Development of the former Hellinikon Airport – HELIOS Programme Integration of Directive 2009/28/EC);
- Joint Ministerial Decision 107017/28.8.2006 ((B'1225/5.9.2006) "On the assessment of the effects of certain plans and programs on the environment, in compliance with the provisions of Directive 2001/42/EC with the same subject", as modified with Joint Ministerial Decision 40238/28.9.2017 (B' 3759/25.10.2017);
- Joint Ministerial Decision 1649/45/2014, "On the specification of consultation procedures and information to the public and participation of interested parties in the public consultation procedures within the context of the environmental licensing of category A projects and activities", which specifies provisions for the consultation means of the different authorities and the ways of informing the public, as well as its participation in the public consultation during the environmental permitting procedure;
- Law 4014/2011 (A209/2011) "On the environmental licensing of works and activities";
- Law 3422/05, "On the ratification of the Aarhus Convention on access to information, public participation in decision making and access to justice in environmental matters" (Directive 2013/35/EC), which stipulates that any citizen should have the right to get a broad and easy access to environmental information and that the public has a right to participate in decision making in environmental matters;
- Joint Ministerial Decision 3711/2003, "On the means of informing citizens on the procedure of approval of environmental terms.";
- Presidential Decree of 28.02.2018 (AAP35/01.03.2018 "On the approval of the Integrated Development Plan (IDP) of the Metropolitan Hellenic - Agios Kosmas Region of Attica";
- Amendment of Presidential Decree of 28.02.2018;
- Joint Ministerial Decision no. 93620 EX 2019 / 29.08.2019 – (Government Gazette B '3347) of the Ministers of Economy and Development, Finance, Environment and Energy, and Tourism, for the Development Zone A-A1 in the area of the former airport;
- Joint Ministerial Decision no. 74502 EX 2019 /3.7.2019 decision of the Ministers of Economy, of Environment and Energy and Culture and Sports "Approval of general organization of the Metropolitan Park of the Metropolitan Pole Hellinikon-Agios Cosmos, and its environmental conditions" (B' 2792);
- Joint Ministerial Decision no. 49977/275/ 11.05.2023 (Government Gazette 3127 B)-Amendment of 74502 EX 2019 /3.7.2019 decision of the Ministers of Economy, of Environment and Energy and Culture and Sports "Approval of general organization of the Metropolitan Park of the Metropolitan Pole Hellinikon-Agios Cosmos, and its environmental conditions" (B' 2792);

NATIONAL AND EU REQUIREMENTS continued

- Joint Ministerial Decision no. 109171 EX 2019/ 03.10.2019 (Government Gazette 3687) on the Urban Areas A-Π1, A Π2, A-Π3, A-Π4, A-Π5, A-Π6 and ΠΜ-Π1, as in force;
- Joint Ministerial Decision no 21933/89/16.03.2022 (Government Gazette 1219 B)-Amendment of 109171Εξ2019/2-10-2019 decision of the Ministers of Economy, of Environment and Energy and Culture and Sports "Approval of Urban Planning Studies of the areas for urban development A-U1, A-U2, A-U3, A-U4, A-U5, A-U6 and PM-U1 of the Metropolitan Pole Hellinikon-Agios Kosmas and of the environmental conditions of the application of the Integrated Development Plan in terms of these areas" (B' 3687/3-10-2019) as to the areas for urban development A-U4 and PM-U1, as in force;
- Joint Ministerial Decision no. 96572 EX 2019 / 05.09.2019 – (Government Gazette B '3405) for the coastal area, as in force;
- Joint Ministerial Decision no YΠΕΝ/ΑΓΕ/78543/382 (Government Gazette 4104 B 01.08.2022) - Amendment of the Joint Ministerial Decision no. 96572 EX 2019 / 05.09.2019 – (Government Gazette B '3405) for the Development Zones in the coastal area, as in force;
- Law 4787/2021 "Ratification of Property Distribution Agreement – Agreement for the Establishment of Surface Right on the Metropolitan City of Elliniko – Agios Kosmas, regulation of related matters and other provisions", as in force;
- Amendment-no. 1324/09.05.2022 notarial deed amending the Distribution Contract sanctioned with Law 4787_2021 (FEK A' 44 26.03.2021), as in force.
- Ministerial Decision no. 3906 (B5798 21/12/2018) "On the specialization of the content of the Environmental Impact Assessment study for the Implementation of the Integrated Development Plan", as in force;
- Ministerial Decision no. 1069 (B841/24.2.2022) that amends no. 3907 (B5798/21.12.2018) and Decision no. 37674 (B2471/10.8.2016) on the classification of public and private works in categories pursuant to Law 4014/201, as in force;
- Ministerial Decision no. 167563/15.4.2013 "On the specifications of procedures and criteria for the environmental licensing of works and activities pursuant to Law 4014/2011" (B' 964), as in force.
- All of this legislation is publicly available and has been the subject of regular press reporting.

3.2 EBRD Performance Requirements

The Performance Requirements (PRs) of the EBRD provide a useful structure to define the manner in which the Company has been complying with its information and public engagement obligations. The relevant PR for Stakeholder Engagement is PR10 (Information Disclosure and Stakeholder Engagement) .

EBRD's PR10 states that national laws and regulations regarding public information disclosure and consultation must always be considered when developing and implementing a project. In the event that national laws are insufficient or there are significant discrepancies between national and PR10 provisions, the principles of PR10 should then be considered.

The EBRD PR10 requires its clients to conduct stakeholder engagement based on providing local communities that are directly affected by the Project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner and free of manipulation, interference, coercion and intimidation. The nature and frequency of stakeholder engagement must be proportionate to the nature and scale of the project and its potential adverse impacts.

PR10 requires in particular:

- The commencement of stakeholder engagement activities at the earliest stage of project planning and continuous throughout the life of the Project;
- A systematic identification and mapping of stakeholders to be documented into a SEP;
- A disclosure of the ESIA and disclosure of project information to ensure meaningful consultation and to allow stakeholders to provide inputs and raise concerns, taking into account specific needs of groups that may be differentially or disproportionately affected by the project; and
- The provision of an effective procedure or mechanism through which people can make comments or raise grievances.

The EBRD Guidance Note on Grievance Management is considered a benchmark for good practice with regard to defining grievance mechanism and managing grievances. The Guidance Note advocates that managing grievances is essential for a robust stakeholder engagement strategy and, implicitly, for a successful project implementation. The Guidance Note outlines how the grievances process should be set up, with human resources allocated to it, as well as arrangements made by the project developer around maintaining confidentiality and keeping timelines defined for resolving grievances.

04

STAKEHOLDER ENGAGEMENT PROCESS

Stakeholder engagement constitutes the basis for building up constructive and strong relationships, which are essential for a successful project's risk management. Robust stakeholder engagement that lasts throughout the life of a project will enable LAMDA Development to solve problems faster and at less cost.

The key principles are to be open and transparent with stakeholders, and to be willing to accept responsibility to account for impacts associated with the Project activities.

The objective of the Stakeholder Engagement process is to:

- Identify key groups affected by or with an interest in The Ellinikon;
- Understand their interests in and concerns with the Project;
- Provide an outline of planned Stakeholder Engagement for the Project;
- Build and maintain a constructive relationship with Stakeholders, in particular the directly affected communities;
- Provide means for adequate engagement and ensure that meaningful environmental and social information is disclosed to the Project's stakeholders; and
- Define the roles, responsibilities, and resources necessary to implement the SEP, including the procedures to monitor and follow up on stakeholder feedback and grievances.

05

STAKEHOLDER IDENTIFICATION

The objective of stakeholder identification is to establish which organizations and individuals may be directly or indirectly affected (positively and negatively / permanently or temporarily) or have an interest in the Project. Stakeholder identification is an ongoing process, requiring regular review and updating as the Project proceeds.

The main groups of stakeholders identified so far are listed in Table 1. The list will be updated and modified in the course of the Project development.

A stakeholder is defined as any individual or group, who is potentially affected by the Project (affected parties) or is interested in the Project and its impacts (interested parties).

Table 01 Identified Groups of Stakeholders related to the Project

Group of Stakeholders		Description / Parties	Point of contact / Channel of communication	Relevance to / Interest in / Impacts
Local population	<ul style="list-style-type: none"> Residents located near the project affected area; Residents of communities located near roads used for transporting materials during construction. 	<ul style="list-style-type: none"> Residents of the Elliniko-Argyroupolis, Alimos and Glyfada municipalities; Local businesses & other businesses with activity in the area around the Project 	<ul style="list-style-type: none"> LAMDA Development's and The Ellinikon websites, and the Company's information desk. Any request is forwarded to the relevant departments to answer. The e-mail or phone number of the person who contacted the company is archived according to the statement of consent; Press Releases/Announcements; Events & Webinars; Project development consultations; Annual Financial & Sustainable Development Report. Newsletters 	<ul style="list-style-type: none"> Benefits from new infrastructure development (road and tram network, pedestrian and cycle routes, etc.); Increased quality of life through numerous open public amenities, such as the Metropolitan Park, the Coastal Front, the AMEA complex building, various recreational areas, activities, playgrounds and other diverse uses; Financial benefits during and post construction phase; Enhanced local microclimate and biodiversity through extensive new green areas; Increased accommodation opportunities via new residential developments; Possible nuisance impacts during construction phase; Local individuals will be able to influence the Project by providing their views and comments.
	<ul style="list-style-type: none"> The Project spans three municipalities: Elliniko - Argyroupolis, Alimos and Glyfada. 	<ul style="list-style-type: none"> Municipality of Elliniko-Argyroupolis Municipality of Alimos; Municipality of Glyfada; 	<ul style="list-style-type: none"> Chief Corporate Affairs Officer, Corporate Affairs; Chief Marketing & Communications Officer; Site Management Senior Director; Consultant to the CEO; Official meetings and discussions; Submission and approval of technical studies during design and construction phases. 	<ul style="list-style-type: none"> Municipal Authorities have direct influence / impact on the project through regulatory and permit controls; Provide valuable local support and contribute to ensure that the project brings optimum value to local residents; Will often be the first point of contact for proposals and complaints from local residents, who will expect the municipal authorities to pursue their complaints / proposals.

Table 01 Identified Groups of Stakeholders related to the Project

Group of Stakeholders		Description / Parties	Point of contact / Channel of communication	Relevance to / Interest in / Impacts
Administrative Bodies and Authorities	<ul style="list-style-type: none"> National authorities (related ministries); Regional authorities (district level government authorities). 	<ul style="list-style-type: none"> Ministry of Finance; Ministry of Environment and Energy; Ministry of Growth & Investment; Ministry of Culture; Ministry of Education Religious Affairs and Sports; Ministry of Infrastructure & Transport; Ministry of Tourism Ministry of Civil Protection Hellinikon Office Region of Attica; Region of Attica - Regional Unit of South Athens. 	<ul style="list-style-type: none"> Chief Corporate Affairs Officer, Corporate Affairs; Senior Director Urban Planning and Permitting Department; Senior Environmental Permitting Manager; Senior Archaeology Manager; Official meetings and discussions; Notification emails; Newsletters; Email and letter correspondence; Site visits. 	<ul style="list-style-type: none"> Administrative Authorities have direct influence / impact on the project through regulatory enforcement; Issuance of the necessary Joint Ministerial Decisions (JMD) relevant to the development; Issuance of the necessary permits for construction and other works; Issuance of decisions / approvals pertaining to certain aspects of the project and its operation may impact the Project's development and timeline; Appropriate and timely wise management of archaeological and other findings on the site area.
General public, Non-Governmental Organizations (NGOs) and independent experts	<ul style="list-style-type: none"> General public Specialized environmental, social and research organizations, NGOs; Experts on a national and international level; Athletes. 	<ul style="list-style-type: none"> General public; Universities and academic community (esp. economists, architects, urban planners, etc.); Chambers of Commerce & Industry; Industry & Professional associations (SEV, SETE, etc.); Technical Chamber of Greece (TEE); Think tanks (IOBE etc.); Key professionals / experts in Greece and abroad; NGOs; Environmental NGOs; Activist groups. 	<ul style="list-style-type: none"> LAMDA Development's and The Ellinikon websites and the Company's information desk. Any request is forwarded to the relevant department to answer. The e-mail or phone number of the person who contacted the company is archived according the statement of consent. Press Releases/Announcements; Events & Webinars; Site visits. Project development consultations; Annual Financial & Sustainable Development Report; Official meetings and discussions; Public consultation on the Strategic Environmental Impact Study and other Environmental Studies (see section 6.1). 	<ul style="list-style-type: none"> Provide expert opinion and advice on particular aspects of the project related to their specialization; May make proposals to make the Project more valuable to general public or to particular vulnerable or minority groups; Will help to ensure environmental best practice and monitoring; Will contribute proposals to assist the incorporation of the project into the fabric of local commercial and residential communities; May raise objections and other obstacles to certain aspects of the project; Potential partnerships with NGO's and independent experts; General public will be able to influence the Project by providing their views and comments.

Table 01 Identified Groups of Stakeholders related to the Project

Group of Stakeholders		Description	Point of contact / Channel of communication	Relevance to/ Interest in / Impacts
Media	<ul style="list-style-type: none"> Press Radio, TV Internet sources (websites, blogs, social media, etc.). 	<ul style="list-style-type: none"> International news media; National news media; Local media of Southern Attica; Specialized media (real estate, construction, environmental, etc.); Individual journalists; Social media. 	<ul style="list-style-type: none"> Chief Marketing and Communications Officer; Corporate Communications Senior Director; Site visits; LAMDA Development's and The Ellinikon websites; Press Releases/Announcements; Events & Webinars; Press Site visits (national & international) Annual Financial & Sustainable Development Report; Newsletters; Annual Ordinary General Meeting. 	<ul style="list-style-type: none"> Cover news related to the Project on an ongoing basis Help inform the public and specific audiences on key aspects of the Project The media acts as a conduit of public opinion and feedback relating to issues of general and particular concern, allowing the Company to respond either individually or publicly to the issues raised. We view media reporting and commentary as an opportunity rather than a threat.
Organizations involved in Project implementation	<ul style="list-style-type: none"> Construction and design companies involved in the implementation of the Project Contractors and contractor's staff Consultants 	<ul style="list-style-type: none"> Employees of Hellinikon S.M.S.A. and LAMDA Development S.A. PMC teams. 	<ul style="list-style-type: none"> Their contact point is their direct partner or the respective department of Hellinikon and/or LAMDA Development, as well as the Executive Committee of the project. Human Resources (for employees). 	<ul style="list-style-type: none"> Directly affect the Project through involvement in planning, design and construction activities. Site employees and contractors are directly involved in the construction activities of the Project and have a direct interest in its evolution (and in the proper implementation of environmental and health and safety regulations).
Potential Clients	<ul style="list-style-type: none"> Buyers Tenants Customers 	<ul style="list-style-type: none"> Residential buyers Retail investors Tenants (Retail or Residential) Retail users Suppliers 	<ul style="list-style-type: none"> Commercial Departments The Ellinikon website (https://theellinikon.com.gr/) The Riviera Tower website (https://theellinikonrivieratower.com/) The Riviera Galleria website (https://www.rivieragalleria.theellinikon.com.gr/) The Ellinikon Sales email address (sales@lamdadev.com) Meetings Newsletters Annual Financial & Sustainable Development Report Events Webinars 	<ul style="list-style-type: none"> Impact / Influence the project through decision making Interested in the project progress Provide funding for the implementation of the project.

Table 01 Identified Groups of Stakeholders related to the Project

Group of Stakeholders		Description	Point of contact / Channel of communication	Relevance to/ Interest in / Impacts
Internal Stakeholders	Employees	<ul style="list-style-type: none"> Staff of Hellinikon S.M.S.A. and LAMDA Development S.A and other subsidiaries companies such as, LAMDA Malls, etc. 	<ul style="list-style-type: none"> Human Resources department. Open daily communication with the Human Resources Department Electronic Document Management system (ACONEX) Intranet tools (Success factor, The HUB, myworLD) Newsletters/ Emails / Letters Annual Financial & Sustainable Development Report Monthly reports Regular project meetings Continuing education Performance evaluation process Surveys, Webinars & Events 	<ul style="list-style-type: none"> Employees have a direct influence from the development of the Project and reciprocal impact to its actual progress. Directly affect the Project through involvement in planning, design and construction activities.
	LAMDA Development shareholders as of 30.09.2024.	<ul style="list-style-type: none"> Consolidated LAMDA Holdings (43.7%) Voxcove Holdings (10.0%) Brevan Howard & Partners (6.4%) G. Prokopiou (2.0%) EBRD (1.8%) Aegean Airlines SA (1.7%) Retail investors (6.6%) Greek institutional investors (6.5%) Foreign institutional investors (20.6%) Treasury shares (0.8%) 	<ul style="list-style-type: none"> Responsible for the communication with the financial / investment community: Chief Strategy & IR Officer. Responsible for the communication with the media: Chief Marketing and Communications Officer Requests are received via the Investors Relations Department, The Ellinikon and/or LAMDA Development's website and the Company's information centre (phone/ fax) for further processing by the appropriate department(s). 	<ul style="list-style-type: none"> Monitor and raise questions regarding the project progress and economic results and prospects. Provide the equity capital necessary for the realization of the project.
Investors, Capital & Finance Providers	<ul style="list-style-type: none"> Regulator Creditors/ Banks Analysts Stock brokers Athens Exchange community. Joint Ventures 	<ul style="list-style-type: none"> Hellenic Capital Markets Commission (HCMC) Eurobank Piraeus Bank Alpha Bank Other Creditors/Banks Athens Exchange (ATHEX) Brokerage Firms Institutional investors (Greek & Foreign) 	<ul style="list-style-type: none"> Annual Ordinary General Meeting. Annual Financial & Sustainable Development Report. IR Events & Site visits. Shareholder and Investor Communication Platform. Communication through competent departments (Investor Relations & Investment). 	<ul style="list-style-type: none"> Monitor / Interested in the project progress Provide funding for the implementation of the project. Provide debt capital for the project development Provide independent analysis, valuations and assessments on action plans, deliverables, actual results versus plans and forecasts pertaining to LAMDA Development and the project.

Table 01 Identified Groups of Stakeholders related to the Project

Group of Stakeholders		Description	Point of contact / Channel of communication	Relevance to/ Interest in / Impacts
Specific vulnerable groups impacted by the Project	<ul style="list-style-type: none"> People with difficulty in engaging with the stakeholder consultation process. Physically and/or socially challenged people. Facilities/ Organisations / groups currently based on site. 	<ul style="list-style-type: none"> People with special vulnerability due to physical disability, social or economic standing, legal status, limited education, lack of employment or housing. NGOs based on The Ellinikon (Amimoni, Ermis, Victor Artant, Association of People with Multiple Sclerosis). NGOs/ Public services situated on site (Metropolitan Community Clinic etc.). Athletes accommodated in the Sports facilities in the coastal front. Antiquities storeroom within Metropolitan Park. 	<ul style="list-style-type: none"> Requests are received via the Investors Relations Department, Corporate Communications Department, The Ellinikon and/or LAMDA Development's website and the Company's information centre (phone/ fax) for further processing by the appropriate department(s). Site Operations Division Archaeology department 	<ul style="list-style-type: none"> The Project is intended to provide significant benefits to all residents of Attica as a whole, and to local residents in particular, regardless of age or needs. Provide consultation to ensure that publicly accessible parts of the Project provide suitable access and amenities to all social groups. Ensure the rehousing of public benefit organisations currently housed in the Hellinikon site Relocation of Antiquities storeroom within Metropolitan Park. Provide direct consultation with NGOs that are to be moved to new facilities within the project (Amimoni, Ermis, Victor Artant, Association of People with Multiple Sclerosis). Positive impact the creation of a housing space for associations representing people with special needs within the property. Provide accommodation to the users of the Sports facilities in the coastal front (EAKN SPORTS) in the New Sports facilities of the Metropolitan Park.

STAKEHOLDER ENGAGEMENT PROGRAM

6.1 Stakeholder Engagement Activities to Date

The Project has been subject to a local Strategic Environmental Impact Study (SEIS) for the PD (Presidential Decree) and to an Environmental Impact Study (EIS) for the Joint Ministerial Decisions (JMDs) with associated public consultation and public disclosure in accordance with local/national legal and permitting requirements reportedly, stakeholders have been engaged, in accordance with the national environmental legislation. The public consultation of the Strategic Environmental Impact Study started by the publication of the relevant announcement in six newspapers on 20 July 2017 and 21 July 2017. Associations and individuals took part in the consultation and expressed their objections to a number of issues related to the Integrated Development Plan and its SEIS. The public consultation ended when the Environmental Licensing Directorate of the Ministry of Environment issued its positive recommendation on 21 November 2017 (updated on 20 December 2017) having taken into consideration all the opinions of the bodies and the public even after the expiration of the 20-day deadline for submission of opinions set out in Article 2 par.4 of Law 4062/2012.

Following the issuance of the PD an EIS was prepared and submitted to the Environmental Licensing Directorate on March 2019. According to national environmental legislation the Directorate asked the relevant Authorities having jurisdiction to express their opinion, as also the Prefecture of Attica to start another public consultation through a relevant announcement. During this period also various municipal consultation events have taken place. Comments from municipalities, affected residents and journalists have been received during these events as well as events (press, etc.) organized by the company.

Following this period the Environmental Licensing Directorate of the Ministry of Environment issued its positive recommendation on 24 June 2019 and the Central Management Council met and approved the EIS in order to issue the relevant JMDs per each area of the Metropolitan Pole.

In addition, there is The Ellinikon dedicated website, which aims to provide relevant information about the Project to the public. The website includes a contact form.

According to Law 4014/2011 (A209/2011) as in force, Law 4062/2012 (A70/2012) as in force and Law 4422/2016 (A181/2016) the following environmental studies were submitted and associated public consultation and public disclosure with stakeholders have been engaged in accordance with national legal, environmental and permitting requirements for the approval of the studies.

- (1) Integrated Development Plan of the Hellinikon Project has been subject to a Strategic Environmental Impact Study (SEIS) for the issuance of the Presidential Decree (PD).
- (2) Implementation of the Integrated Development Plan of the Hellinikon Project to an Environmental Impact Study (EIS) for the issuance of Joint Ministerial Decisions (JMDs).
- (3) Sports Facilities Project has been subject to an Environmental Impact Study (EIS) for the issuance of an Environmental Terms Approval Decision of the Project.
- (4) Riviera Galleria Project has been subject to an Environmental Impact Study (EIS) for the issuance of an Environmental Terms Approval Decision of the Project.
- (5) Commercial Hub Project has been subject to an Environmental Impact Study (EIS) for the issuance of an Environmental Terms Approval Decision of the Project.

For more information about the Stakeholder Consultation of the Project, please refer to **Appendix 1** of this Plan.

6.2 Annual Reporting

Sustainable Development is fundamental to the delivery and operations of The Ellinikon. The Company has defined sustainable development as:

“A form of development policy that seeks to meet the economic, social, and environmental needs of society in a way that ensures short-term, medium term and, above all, long-term prosperity.”

LAMDA Development has formulated a Sustainable Development Strategy for The Ellinikon project to present the sustainability objectives for The Ellinikon on a Programme and project level, and how these will be advanced through commitments and actions during the design, construction, and operation phases of the portfolio to address social, environmental and economic issues.

The Strategy constitutes an integral part of its business strategy, focusing on achieving the U.N. Sustainable Development Goals.

On an annual basis, LAMDA Development discloses its performance on the Annual Corporate and Sustainable Development Reports, which are publicly available at the LAMDA Development website:

- Annual Corporate Report
<https://www.lamdadev.com/annual-reports/2023/>
- Annual Sustainable Development Report
https://www.lamdadev.com/sites/default/files/2024-07/lamda_sdr_2024_en.pdf

6.3 Engagement Plan

The Project ensures that consultation with stakeholders will be undertaken under an inclusive approach. All affected groups shall be represented as appropriate, to ensure that particular needs are highlighted and given sufficient weight and inclusion. Stakeholders will be informed about decisions and changes in project planning that affect them along with reasons and considerations on which the decision is based, because of the engagement process. Consultation shall be free of external manipulation, interference, coercion or intimidation. All engagement will be documented adequately.

Detailed plans for later phases of the Project will be developed during the next phases of the Project (construction and operation). The intention will be to continue an active program of engagement with affected and interested parties to ensure they are kept informed and have an opportunity to continue a constructive dialogue about the Project and with LAMDA Development. LAMDA will develop a list of meetings offering the opportunity for stakeholders to provide comments and raise concerns and reach out to special needs groups in order to ensure that their views and concerns are taken into account. Locations and dates will be communicated in advance and LAMDA Development will define the relevant channels of notifications.

Table 02 Stakeholder Engagement Activities

Date	Timing/ Project Stage	Target Stakeholders	Type of engagement Activity	Description	Responsibility	Follow-up/Action Points resulting from activity
March each year.	Pre-construction, Construction, Operation.	<ul style="list-style-type: none"> LAMDA shareholders Investors Regulator (HCMC) Athens Exchange Creditors/ Banks Analysts Stockbrokers Financial Community Media. 	Release of Fiscal Year results & teleconference. Including Non-Financial Report, monitoring performance on environmental and social issues.	Published on athexgroup.gr and on lamdadev.com Press Release sent to all national media and key international business media Special presentation for analysts / investors via teleconference (Teleconference for the Fiscal Year results announcement)	Responsible for the communication with the financial / investment community: Chief Strategy & IR Officer	
May, September, November each year.	Pre-construction, Construction, Operation.	<ul style="list-style-type: none"> LAMDA shareholders Investors Regulator (HCMC) Athens Exchange Creditors/ Banks Analysts Financial Community Media. 	Release of Q1, H1, 9-month results and teleconference.	Published on athexgroup.gr and on lamdadev.com Press Release sent to all national media and key international business media Special presentation for the investment community via teleconference.	Responsible for the communication with the media: Chief Marketing & Communications Officer	
June each year & at different points throughout the year if deemed necessary.	Pre-construction, Construction, Operation.	<ul style="list-style-type: none"> LAMDA shareholders Investors Regulator (HCMC) Athens Exchange Creditors/ Banks Analysts Stockbrokers Financial Community Media 	Annual Meeting of Shareholders, Extraordinary Meetings of Shareholders.	Invitation (incl. dates and agenda) to the annual shareholders meeting published on athexgroup.gr and lamdadev.com in advance (at least 20 days before the meeting), as well as the resolutions of the meeting.	Responsible for communication with the central authorities, building permits and accountable for JMDs is Urban Planning & Permitting Department	
March-April each year	Pre-construction, Construction, Operation	<ul style="list-style-type: none"> Regulator (HCMC) Athens Exchange Creditors/ Banks Analysts Financial Community 	Annual briefing of analysts / investors on the Fiscal Year Financial Results.	Special presentation for analysts / investors via teleconference (Teleconference for the Fiscal Year results announcement)		

Table 02 Stakeholder Engagement Activities

Date	Timing/ Project Stage	Target Stakeholders	Type of engagement Activity	Description	Responsibility	Follow-up/Action Points resulting from activity
Multiple times per year	Pre-construction, Construction, Operation.	General public	CEO presentation	CEO presentation with the presence of journalists and shareholders	Chief Strategy & IR Officer Chief Marketing, Communications Officer	
April –June each year.	Pre-construction, Construction, Operation.	General public	Annual Corporate Report & Annual Sustainable Development Report	Corporate Annual Report and Sustainable Development Report are published on lamdadev.com, disclosing performance of the Group	Chief Marketing, Communications Officer & Senior Sustainability Manager	
June each year.	Pre-construction, Construction, Operation.	Monitoring Committee of the Ministry of Environment and Energy	Annual Environmental Report	Annual Environmental Report presenting the environmental management and monitoring plans of each project inside the Metropolitan Pole	Environmental Unit of the Ellinikon Project	
June each year.	Pre-construction, Construction, Operation.	<ul style="list-style-type: none"> LAMDA shareholders Investors Regulator (HCMC) Athens Exchange Stockbrokers, Creditors/ banks Analysts Financial Community Media 	Annual General Assembly	Presentation during the Annual General Assembly and distribution to the press	Chief Strategy & IR Officer Chief Marketing and Communications Officer	
Prior to procurement of works and construction actions.	Pre-construction, Construction.	<ul style="list-style-type: none"> Local authorities Media 	Meetings with Local Authorities	Organization of meetings with Local Authorities and NGOs as required on Site to understand and support their needs.	Chief Marketing & Communications Officer.	
Prior to construction actions and throughout construction.	Pre-construction, Construction.	Contractors / Construction managers and Project Management services providers.	Monthly status reports	Reports to be submitted to the Company by all key contractors throughout the construction phase in order to ensure effective monitoring.	Project Teams	

Table 02 Stakeholder Engagement Activities

Date	Timing/ Project Stage	Target Stakeholders	Type of engagement Activity	Description	Responsibility	Follow-up/Action Points resulting from activity
Ongoing.	Pre-construction, Construction, Operation.	LAMDA shareholders Investors Regulator (HCMC) Athens Exchange Stockbrokers Creditors/ banks Financial Community Media	Announcements concerning The Ellinikon Project. Published on athexgroup.gr, on lamdadev.com and the project's website.	Published on athexgroup. gr and on lamdadev.com, thehellinikon.com. Press Release sent to all national media and key international business media.	Chief Strategy & IR Officer Chief Marketing and Communications Officer	
Multiple times per year.	Pre-construction, Construction, Operation.	National authorities Regional authorities Local authorities Business Community Financial community Potential investors.	Participation in business conferences and forums.	Keynote speeches and participation in panel discussion by the CEO and other top executives, as appropriate.		
When necessary.	Pre-construction, Construction, Operation.	National authorities Regional authorities Local authorities Business Community Financial community Potential investors.	Meetings and calls.	One-to-one or one-to-few meetings and calls between LAMDA Development top executives and interested parties in appropriate circumstances.		
When necessary.	Pre-construction.	Environmental Permitting Authority of the Ministry of Environment and Energy	Environmental Impact Studies – Consultation Phase	Submission to the Ministry and public consultation of EIS.	Chief Development Officers with the support of Senior Director Urban Planning and Permitting and Senior Environmental Permitting Manager	
Prior to procurement of and construction actions.	Pre-construction, Construction.	Residents and businesses located near The Ellinikon project site.	Digital Websites (The Ellinikon, LAMDA Development,etc.)	Access via LAMDA's website, Public Grievance Form, to request information or to provide feedback on any matter.	Chief Marketing and Communications Officer	
Ongoing.	Preconstruction, Construction, Operation.	National authorities: Ministry of Culture	Assessment from Ministry of Culture, including archaeology issues during JMDs amendments.	Upon JMDs approval, all construction activities will be operated with respect to the environment, culture and archaeological findings, according to JMDs terms.	Chief Development and Investment Portfolio Officer Senior Director Urban Planning & Permitting.	

Information Disclosure

LAMDA Development will ensure that the following type of information will always be up to date and available to individuals and groups affected by the Project:

- The type and duration of Project activities;
- Potential risks and impacts of the Project and intended mitigation measures;
- Planned stakeholder engagement, consultation and participation process;
- Communication channels and timelines; and
- Process of submitting grievances and how they will be managed.

All information related to the project can be found at The Ellinikon dedicated website, which aims to provide awareness about the Project to the public. The web site includes a contact form.

There will be regular updates on the Project website, announcements and press releases issued, information disclosure and information on the grievance mechanism.. Additionally, the public grievance form will be accessible via the Company's website (www.lamdadev.com), The Ellinikon website (www.theellinikon.com.gr) and the Company's Information Desk.

Additionally, the following Project websites exist:

- <https://theellinikonrivieratower.com>
- <https://rivieragalleria.theellinikon.com.gr>
- <https://experiencepark.theellinikon.com.gr/>

providing detailed information about the Project in Greek and English language. The 'Media Centre' on the website provides updates regarding press releases as well as other relevant informative notes and publications.

Besides using the contact form via the website, specific information requests can be made to The Ellinikon directly:

 Hellinikon S.M.S.A.
2 Ellinikou & Ita
16 777 Elliniko, Greece

 Phone +30 210 7450600
Fax +30 210 7450645

 lamda@lamdadev.com
<https://theellinikon.com.gr>

Table 03 Information Disclosure Plan Template

Type of Documents/ Information to be released	Project Stage	Date, Schedule, Timing	Target Stakeholders	Publication Source	Language
The Ellinikon 2-Year Plan	Construction	Q3 2021	All stakeholders	LAMDA Development	Greek & English

Table 04 Action Plan for Stakeholder Engagement and Disclosure

Activity/Element	Target Stakeholders	Description	Timing	Responsibility	Follow up (documentation, monitoring etc.)
Stakeholder comments on the Project SEIS and EIA.	All stakeholders.	Comments on the EIA in the frame of the formal environmental permitting procedure for the Project. The comments were received and processed by the Ministry of Environment. Public hearing of the Project EIA in the frame of the formal environmental permitting procedure for the Project.	Please refer to Appendix A, for more information regarding EIAs submitted.	LAMDA/ External consultant.	
Online publication of project related documentation and grievance form.	All stakeholders.	A summary of the grievance mechanism (in the form of a bullet point list of the grievance process) and the Grievance Form (Appendix A) shall be available on the Project website in Greek and English languages. The Project NTS and ESMP will be available in digital format (as pdf files) on the Project's website in both Greek and English languages.	Prior to commencement of construction.	LAMDA/ External consultant.	
Addressing comments, questions, grievances received on the Project.	All stakeholders.	Comments, questions and grievances on the Project received via email, or post will be addressed and documented according to the grievance procedure. Enquiries and answers provided via telephone will be also recorded in the grievance log.	During the lifetime of the Project.	LAMDA/ External consultant.	Most complaints are received via standard contact form/ general communications email and not via the grievance form, through which the Company receives around 20 emails/year. The Company answers all mails. There was only one case, where the Company has received a huge volume of mails through the grievance form.
Address Project-related aspects in local community meetings.	Local community members (municipality, representatives of affected parties).	Explain the Project, its associated impacts and improvements, implementation progress during scheduled community meetings. Identify the extent of the impact on local business activities. Bring awareness of the means of information and grievance submission available.	Prior to commencement of construction and during the lifetime of the Project.	LAMDA/ External consultant.	
Address Project-related aspects during regular authorities' meetings.	Municipal Environmental Authorities.	Discuss/inform on Project and implementation status during the regular meetings with the environmental authorities.	During the lifetime of the Project.	LAMDA/ External consultant.	

GRIEVANCE MECHANISM

In addition to the contact form on the Project website, LAMDA Development has established a functioning grievance mechanism for internal staff as well as external stakeholders.

7.1 Principles

A grievance may take the form of specific complaint about impacts, damage or harm caused by the Project, concerns about access to the project stakeholder engagement process or about how comments have been addressed, as well as concerns about Project activities during construction or operation, or perceived incidents or impacts.

A Grievance Mechanism is an established process to receive stakeholder concerns and grievances and to facilitate their resolution through a set procedure. Depending on the scale of potential risks and adverse impacts of a project, the grievance mechanism may be adjusted.

The general principles of an effective grievance mechanism are:

- Assignment of responsible person, team or function to organize the resolution of grievances;
- All stakeholders have the right to be informed about the Project and to raise concerns and suggestions during the decision making process;
- Grievances and concerns are to be addressed promptly and effectively;
- The process is to be transparent, culturally appropriate and anonymous (if required, protecting privacy of affected individuals);
- The Grievance Mechanism is to be accessible to all stakeholders at no cost and without retribution; and
- All stakeholders are to be continuously informed about the Grievance Mechanism.

The Grievance Procedure specific to the Project is developed with the following aims:

- To build and maintain trust with all stakeholders;
- To prevent adverse consequences of failure to adequately address grievances; and
- To identify and manage stakeholder concerns and thus support effective risk management.

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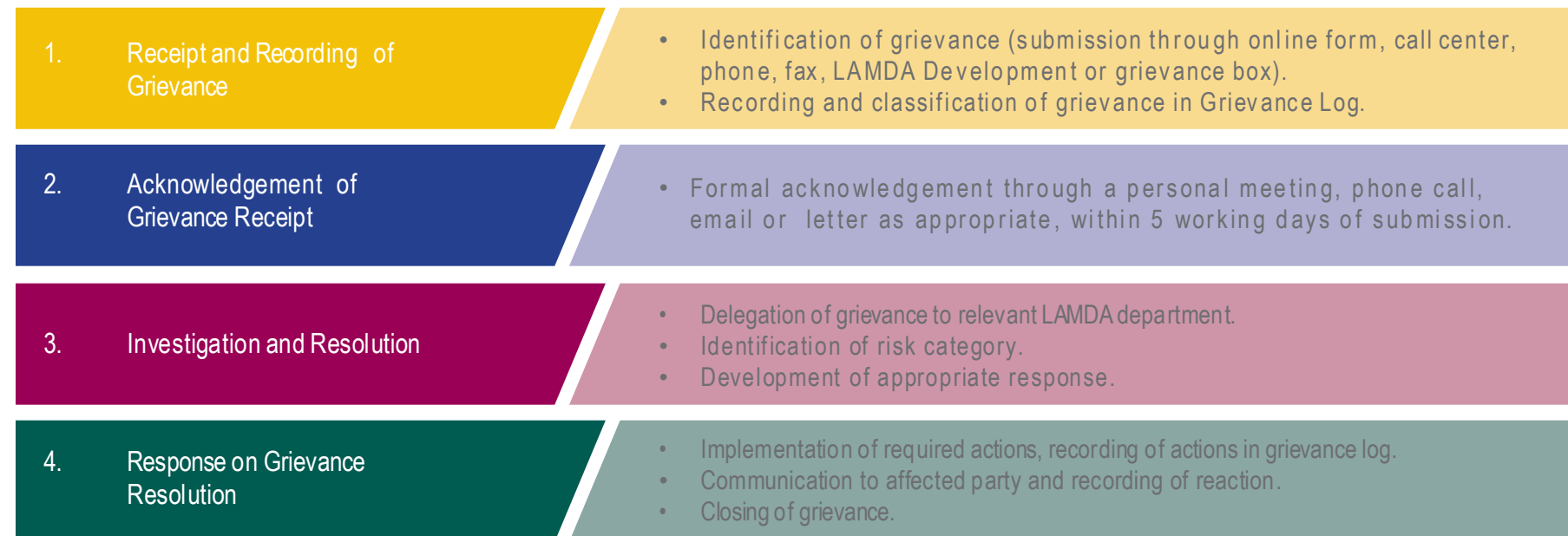
7.2 Grievance Procedure

The internal and external Grievance Procedure is free, open and accessible to all and comments and grievances will be addressed promptly and effectively in a fair and transparent manner that is culturally appropriate. Information about the procedures, who to contact and how, are made available on the Project website and communicated during engagement meetings.

A sign at the Project location will be displaying information of the project sponsor, along with a phone number included for possible grievances.

LAMDA Development has assigned staff responsibilities to appropriately manage the Grievance Management (See section 10). The grievance procedure comprises the following steps:

Figure 1 Grievance Procedure



Grievances are documented by using an electronic grievance log to ensure proper registration and giving LAMDA Development the possibility to track the given response to a grievance. A grievance log is containing the following entries:

- Date lodged by complainant;
- Contact details of complainant (if not anonymously submitted);
- Name of the staff charged with addressing the complaint;
- Type of grievance and general information;
- Proposed resolution of the complaint;
- Due date;
- Decision;
- How and when relevant Project decisions were communicated to the complainant;
- Feedback from the complainant;
- Results; and
- Closing date of the issue

LAMDA Development collects logged grievances on a regular basis, once a week. The Grievance Form is presented in Appendix A. The grievance form will be uploaded in the contact sections of the website of both LAMDA Development (www.lamdadev.com) and The Ellinikon (www.theellinikon.com.gr).

Grievance forms are also accessible at the Company's reception (37A Kifissias Ave. (Golden Hall) 151 23 Maroussi, Greece).

All requests are forwarded to the appropriate department to answer. The Corporate Communications Department is responsible to contact the interested party and provide them the necessary information.

If the complainant is not satisfied with the solutions proposed/ implemented to address the grievance, it is entitled to exercise all his/her legal remedies in accordance with the legal framework of Greece, including applications for interim injunctions, cancellation of administrative acts and claims for tortious compensation

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STAKEHOLDER ENGAGEMENT DOCUMENTATION

Documentation is key to ensure transparent Stakeholder Engagement and internal and external communication.

LAMDA Development aims at addressing every issue raised in an adequate and timely manner and compile individual responses and arrange further meetings where necessary. This shall provide input and consideration in the overall decision making process. To guide and manage this process, documentation and reporting of all stakeholder engagement is essential. The elements of the Stakeholder Engagement documentation shall include at least:

- Minutes produced from all external consultation meetings and documented within a consultation register;
- Grievances log and the documented provided responses; and
- Register of trainings, internal emails and intranet notes will be kept in order to document the communication regarding the workers' Grievance Mechanism.

LAMDA Development shall update this SEP prior to construction and a second time prior to operation. Additional updates due to Project development may be required. In the process of updating the SEP the past stakeholder engagement activities will be described.

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MONITORING AND EVALUATION

The Project performance will be monitored and periodic reports will be provided to EBRD. LAMDA Development will have the responsibility to facilitate any monitoring visit or audit requested by EBRD. Annual monitoring reports will be made available to affected communities concerning ongoing risks, impacts and mitigation measures. Reporting will be scheduled according to the ESMP.

The effectiveness of engagement activities will be evaluated against the goals and objectives set out in the SEP. The evaluation will be performed independently based on meeting minutes, stakeholder engagement logs and the grievance log. This evaluation will examine the extent to which activities were implemented in accordance with the SEP, and the extent to which they achieved the aims defined here.

In the monitoring and evaluation process for stakeholder engagement, all the consultations undertaken, all the issues raised, and the actions taken will be recorded. Also, this process implies the description of the lessons learned and any changes to the consultation process. All queries in relation to the project will be filed in a comments registry, analyzed, and reported to management team on a two months basis during project development and implementation. The results and feedback from information disclosure and public consultation will be documented and reported as appropriate. Summary reports will contain details about suggestions or concerns raised by stakeholders and how their comments have been taken into account.

Engagement level of stakeholders will be monitored by a set of indicators, which may include the following items:

- Number of communications;
- Type of communications;
- Frequency of communications;
- Number of valid complaints (and number rejected as unclear, problematic or dubious);
- Type of complaints;
- Sources of complaints;
- Number of resolved complaints;
- Average time for resolution of complaints;
- Number of presentations on environmental, social and economic status of the company;
- Number of mass media articles and / or announcements;
- Number of stakeholders involved per action;
- Level / degree of involvement for each stakeholder;
- Number of visitors on the websites; and
- Number of requests for information via websites.

ROLES AND RESPONSIBILITIES

LAMDA Development will be responsible to ensure adequate stakeholder engagement and grievance management throughout the entire Project. In line with this, LAMDA Development will coordinate all aspects related to the implementation of the SEP according to all relevant national and international standards.

Clear definition and communication of roles and responsibilities are key for a successful implementation of the SEP.

Key roles and responsibilities for LAMDA Development to assign are:

- Overall SEP implementation: monitoring and reporting;
- Provide access to relevant information about the project on the Project's and LAMDA Development's website;
- Organize public hearings related to the permitting processes and project compliance;
- Media campaigns and events/ Press releases/ Information disclosure: offer relevant information to the mass media and third parties;
- Implement and manage the grievance mechanism system through email including: identification, reception, maintenance of grievance log, preparation and issuance of response to grievances.

It depends on LAMDA's management to decide how these activities will be allocated e.g. same employee, dedicated experts, group of employees, LAMDA's management etc.

Apart from contact point and the internal mechanism, including all Company's departments (development, legal, treasury and investment relations, investment department, construction's management, financial and administrative and communications and marketing departments) all requests are forwarded to the appropriate department to answer. The Corporate Communications Department is responsible to contact the interested party within 5 days of request submission and provide them the necessary information.

Where a grievance management system is managed by an external service provider, it is important to recognize that the ultimate responsibility for grievance resolution lies with LAMDA Development, including such cases where the third party fails to reach an acceptable resolution.

Figure 2 Grievance Form

Public Grievance Form

Accessible : <https://www.lamdadev.com/en/contact-centre/public-grievance-form>

Please enter your contact information and grievance.
This information will be dealt with according to the **Personal Data Protection Statement** at the end of the present form.

Please note: if you wish to remain anonymous, please enter your comment or grievance in the box below without indicating any contact information.

<p>PLEASE SELECT THE TYPE OF SUBMISSION</p> <p>- NONE -</p>	<p>FREQUENCY OF INCIDENT OR GRIEVANCE *</p> <p>- SELECT -</p>
<p>PLEASE SELECT HOW YOU WISH TO BE CONTACTED *</p> <p>- SELECT -</p>	<p>WHAT WOULD YOU LIKE TO SEE HAPPEN TO RESOLVE THE INCIDENT OR GRIEVANCE</p> <p></p>
<p>PREFERRED LANGUAGE FOR COMMUNICATION *</p> <p>- SELECT -</p>	<p>Please read our Privacy Notice and indicate whether you agree.</p> <p><input type="checkbox"/> I have been informed about the Website Privacy Notice *</p>
<p>DESCRIPTION OF INCIDENT OR GRIEVANCE *</p> <p></p>	<p><input type="button" value="♦ SUBMIT"/></p>

PERSONAL DATA PROTECTION STATEMENT

Our company, “LAMDA DEVELOPMENT S.A.”, a company incorporated under the laws of Greece (“société anonyme”) with its registered seat located at 37a Kifisias Avenue, Marousi 151 23, Greece (herein- after “LAMDA”, “Company”, “we”) is Data Controller for the processing of your personal data in the context of the handling of grievance (hereinafter “Grievance Handling”).

This Statement intends to provide information on the nature of your personal data collected, the means and the purposes of collection, any third parties with which this data is being shared, as well as the rights that you have, according to Greek Law 2472/1997 as in force and Regulation 2016/679 of the European Union on the protection of personal data.

WHICH PERSONAL DATA WE COLLECT

In the context of Grievance Handling, LAMDA collects and further processes your name and your contact details, as well as any other personal data that you willingly disclose in your grievance.

WHY WE COLLECT IT

Personal data is processed pursuant to the following legal bases:

A. Legitimate Interest

The collection of the aforementioned data is necessary for the fulfilment of a legitimate interest of LAMDA, and more specifically, for the handling and reply to the grievance submitted to the Company.

B. Legal Claims

LAMDA might further process sensitive personal data of yours, which you have willingly disclosed in your grievance, in order to be able to exercise and/or advocate its legal claims.

WITH WHOM WE SHARE IT

Your personal data is collected and further processed by the responsible and duly authorized employees of our Company. In the context of Grievance Handling, the recipients of your personal data might be one or more of the following categories of our partners:

- Other companies such as other legal entities of our Group or third parties that collaborate with us for the purposes of the present privacy notice.
- Any other administrative, judicial or public authority or any legal or natural person against which LAMDA has the relevant obligation or right to disclose such data, by law or by court decision.

HOW LONG WE KEEP IT

Your personal data in the context of Grievance Handling will be retained for a period of five (5) years upon the receipt of the grievance, on a case by case basis, depending on the nature of the grievance. Upon expiration of the retention period, LAMDA safeguards that your personal data is destroyed from its systems or records, provided that their retention is no longer required for our business, tax or accounting obligations or the advocacy of its rights before any competent court or any other authority.

OUR COMMITMENTS

In order to ensure the minimization, completeness and accuracy of your personal data, we are committed to periodically review your data and rectify or erase the data, which is not necessary for the purpose described in this notice. Furthermore, we guarantee that we have undertaken all the appropriate technical and organizational measures, according to the technical standards and the applicable laws and regulations, in order to safeguard that the process of your personal data, either by the Company or by third parties on its behalf, is legitimate, appropriate and adequately secure in order to prevent any accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, access to or any other use of such data.

YOUR RIGHTS

According to applicable legislation, in the context of Grievance Handling, you have and can exercise the following rights, after verification of your identity:

- right to access your personal data, including the right to be informed on whether your personal data is being processed at all and if yes, to obtain further information on the processing,
- right to rectification of any inaccurate or incomplete personal data of yours,
- right to object to the processing, for which the Company invokes its legitimate interest, as well as and only if the conditions specified by applicable legislation are met:
- right to erasure and
- right to restriction of processing

In case of exercising your right to rectification, erasure and restriction of your data, these requests will also be communicated to any third-party recipients to whom this data has been in the context of Grievance Handling.

You can exercise any of the abovementioned rights by submitting a written request to our Company. You can expect a reply to such a request within one (1) month following its receipt by the Company. This deadline may be extended for two (2) additional months due to the complexity of your request, and/or the high volume of requests received.

CONTACT DETAILS

You may address all your questions, clarifications or requests related to the process of your personal data in the context of Grievance Handling, by contacting the Data Protection Officer of LAMDA via the email: personaldata@lamdadev.com

In any case, if you feel that we did not provide a satisfactory response to your request and the protection of your personal data is violated in any way whatsoever, you have the right to lodge a complaint with the Hellenic Data Protection Authority, using the following contact details:

Website	www.dpa.gr/
Address	Kifisias Avenue 1-3, P.C 115 23, Athens
Contact Center	+30 210 6475600
Fax	+30 210 6475628
E-mail	contact@dpa.gr

The e-mail or the phone number of the person who contacted the company is archived according to the statement of consent.

APPENDICES

APPENDIX 1 – STAKEHOLDER CONSULTATION

1. Integrated Development Plan of the Hellinikon Project – SEIS Consultation phase

Following the submission of the Strategic Environmental Impact Study (SEIS) for the approval of the Integrated Development Plan of the Hellinikon Project, the public consultation period was initiated through the publication of the relevant announcement in six newspapers on 20 July 2017 and 21 July 2017.

Associations and individuals took part in the consultation and expressed their opinions/ objections to a number of issues related to the Integrated Development Plan and its SEIS.

Following the public consultation and taking into consideration the opinion of other Authorities and Bodies having jurisdiction (even after the expiration of the 20-day deadline for submission of opinions set out in Article 2 par.4 of Law 4062/2012), the Environmental Permitting Authority of the Ministry of Environment and Energy issued its positive recommendation on 21st of November 2017 (updated on 20th of December 2017).

2. Implementation of the Integrated Development Plan of the Hellinikon Project – EIS Consultation Phase

Following the issuance of the PD and as required by the environmental terms the submission of the Environmental Impact Study (EIS) for the approval of the Implementation of the Integrated Development Plan of the Hellinikon Project was submitted. The public consultation period was initiated through the publication of the relevant announcement in a local newspaper on 22nd of March 2019. Associations and individuals took part in the consultation and expressed their opinions/ objections to a number of issues related to the Implementation of the Integrated Development Plan and its EIS.

During this period various municipal consultation events and corporate events have taken place, and comments from municipalities, affected residents and journalists have been received. Following the public consultation and taking into consideration the opinion of other Authorities and Bodies having jurisdiction (as stated in L. 4014/2011) the Environmental Permitting Authority of the Ministry of Environment and Energy issued its positive recommendation on 24th of June 2019 and subsequently the respective JMDs were issued including the approved environmental terms of each area in the Metropolitan Pole.

3. Sports Facilities - EIS Consultation Phase

As required by the approved environmental terms of the JMDs, each project inside the Metropolitan Pole and according to the Ministerial Decision no. 1069 (B841/2022) regarding the Classification of public and private of public and private works in categories pursuant to Law 4014/2011 should submit (if needed) an Environmental Impact Study or a Standard Environmental Commitments Folder for the development of a specific project.

To this end the Environmental Impact Study for the Sports Facilities inside the Metropolitan Park of the Metropolitan Pole has been submitted to the Environmental Permitting Authority of the Ministry of Environment and Energy on 10th of August 2021.

The public consultation period was initiated through the publication of the relevant announcement in a local newspaper on 18th of December 2021. Following the public consultation and taking into consideration the opinion of other Authorities and Bodies having jurisdiction (as stated in L. 4014/2011) the Environmental Permitting Authority of the Ministry of Environment and Energy issued the Environmental Terms Approval Decision on 29th of July 2022. Following the issuance of the Decision the Building Permit of the Project was issued on 23rd of December 2022.

4. Riviera Galleria - EIS Consultation Phase

As already mentioned before the Environmental Impact Study for the Riviera Galleria inside the Metropolitan Pole has been submitted to the Environmental Permitting Authority of the Ministry of Environment and Energy on 21st of December 2022. The public consultation period was initiated through the publication of the relevant announcement in a local newspaper on 25th-26th of February 2023. Following the public consultation and taking into consideration the opinion of other Authorities and Bodies having jurisdiction (as stated in L. 4014/2011) the Environmental Permitting Authority of the Ministry of Environment and Energy issued the Environmental Terms Approval Decision and subsequently the Building Permit of the Project on 30.06.2023.

5. Commercial Hub - EIS Consultation Phase

As already mentioned before the Environmental Impact Study for the Commercial Hub inside the Metropolitan Pole has been submitted to the Environmental Permitting Authority of the Ministry of Environment and Energy on 22nd of December 2022. The public consultation period was initiated through the publication of the relevant announcement in a local newspaper on 21st of February 2023. Following the public consultation and taking into consideration the opinion of other Authorities and Bodies having jurisdiction (as stated in L. 4014/2011) the Environmental Permitting Authority of the Ministry of Environment and Energy issued the Environmental Terms Approval Decision and subsequently the Building Permit of the Project on 30.11.2023.

EIS - Consultation Phase – Authorities having jurisdictions and public consultation

PROJECT	AUTHORITIES/BODIES
(2) IMPLEMENTATION OF THE INTEGRATED DEVELOPMENT PLAN OF THE HELLINIKON PROJECT – EIS CONSULTATION PHASE [APPROVED EIS]	<ul style="list-style-type: none"> • General Directorate of Archaeology and Cultural Inheritance – Ministry of Culture and Sports • Department of Port and built infrastructure – Ministry of Shipping and Insular Policy • Forest Protection Directorate – Ministry of Environment and Energy • General Directorate of Water – Ministry of Environment and Energy • General Directorate of Waste Management – Ministry of Environment and Energy • Directorate of Metropolitan, Urban and Suburban Planning – Ministry of Environment and Energy • Directorate G2 of the Ministry of National Defence • Municipality of Ellinikon - Argyroupolis • Directorate of Urban Planning – Ministry of Environment and Energy • Attica Water Department – Decentralised Administration of Attica • Municipality of Alimos • Road Infrastructure Department – Ministry of Transport and Infrastructure • Environment and Climate Change Department – Attica Region • General Secretariat of Sports – Ministry of Culture and Sports • Department of the Coordination and Inspection of Attica Forest - Decentralised Administration of Attica • Department for Spatial Planning and Infrastructure – Ministry of Tourism • ATTIKO METRO A.E. • Department for Agricultural Economy and Veterinary, Regional Unit Southern Section Athens, Attica Region • Urban Rail Transport SA • Special Inter-level Association for Attica Prefecture (ΕΔΣΝΑ) • Committee for the Campaign for the Metropolitan Park of Ellinikon/Outdoor Cultural Association of the residents of Lower Ellinikon • GLOBAL CITY IKE- N. Triantafyllopoulos (for Orestis Bougas) • "O LOGOS" Newspaper (Publication/Announcement – Submission of views from the interested public)
(3) SPORTS FACILITIES - EIS CONSULTATION PHASE [APPROVED EIS]	<ul style="list-style-type: none"> • Directorate of Prehistoric and Classical Antiquities - Ministry of Culture and Sports • Directorate of Modern Monuments - Ministry of Culture and Sports • Attica Water Resources Department – Decentralised Administration of Attica • Road Infrastructure Department – Ministry of Transport and Infrastructure • General Secretariat of Sports – Ministry of Culture and Sports • Regional Council of Attica • "O LOGOS" Newspaper (Publication/Announcement – Submission of views from the interested public)
(4) RIVIERA GALLERIA - EIS CONSULTATION PHASE [APPROVED EIS]	<ul style="list-style-type: none"> • Directorate of Prehistoric and Classical Antiquities - Ministry of Culture and Sports • Directorate of Modern Monuments - Ministry of Culture and Sports • Attica Water Resources Department – Decentralised Administration of Attica • Road Infrastructure Department – Ministry of Transport and Infrastructure [upcoming approval] • Regional Council of Attica [upcoming approval] • "EFIMERIS DIMOPRASION & PLEIS TIRIASMON" Newspaper (Publication/Announcement – Submission of views from the interested public)
(5) COMMERCIAL HUB - EIS CONSULTATION PHASE [APPROVED EIS]	<ul style="list-style-type: none"> • Directorate of Prehistoric and Classical Antiquities - Ministry of Culture and Sports • Directorate of Modern Monuments - Ministry of Culture and Sports • Attica Water Resources Department – Decentralised Administration of Attica • Road Infrastructure Department – Ministry of Transport and Infrastructure [upcoming approval] • Regional Council of Attica • "O LOGOS" Newspaper (Publication/Announcement – Submission of views from the interested public)



Stakeholder Engagement Plan / [The Ellinikon](#)