



# COMMUNITY CONTRIBUTIONS POLICY

Version 2, September 2024



## 01

## INTRODUCTION

This Community Contributions Policy (hereinafter "Policy") has been approved by the Board of Directors of MOTOR OIL (HELLAS) CORINTH REFINERIES S.A. (hereinafter "Parent Company") and it applies to both the Parent Company and its subsidiaries (hereinafter "Group" or "Motor Oil Group" and "Subsidiaries"), in order to constitute the framework for making decisions in a completely transparent and meritorious manner with regards to the contributions made by the Group to the local communities in which it operates and to the wider society. At the same time, the implementation of this Policy ensures the effective use of the resources available to the Group for this purpose.

The Policy is mandatorily applied to any kind of contribution, even non-remunerative, by the Group.

The Policy is uploaded on the online submission area of the Community Contribution Form and must be accepted by the applicant as a prerequisite for the valid submission of a Community Contribution Request.

## 02

## DEFINITION

A "Community Contribution", corresponding to the concept of sponsorship according to Law 3525/2007, is considered any monetary or other financial contribution in kind, intangible goods, or services from the Motor Oil Group to support specific activities or purposes of the recipient of the contribution in return the promotion of the social and beneficent profile of the Group. This contribution is carried out in accordance with the objectives, priorities, and policies, within the framework of the principles and values provided for in the Code of Ethics and Corporate Responsibility and in the Sustainable Development strategy that the Group adheres.

The definition of Community Contribution may include the support of knowledge dissemination activities, through conferences, workshops, fora, and other related events, always provided the above remunerative or non-remunerative benefits for the Group.

They do not constitute a Community Contribution in the sense of the above:

- a)** Symbolic gifts to third parties, which fall within the scope of the Group's Anti-Bribery and Corruption Policy,
- b)** Posting of advertisements, which is not provided in conjunction with any of the above and
- c)** Charity. The Group may support charity initiatives in the context of its Corporate Responsibility as long as they are consistent with its purposes without expecting any benefit from it.

## 03

## AREAS OF COMMUNITY CONTRIBUTION

The Motor Oil Group accepts, examines, and responds to Community Contribution requests, which are targeted and considered beneficial to local communities and society as long as they relate to the following four (4) areas:

- Arts, culture, and sport – Initiatives related to the support of young artists and sportsmen, the promotion of cultural dialogue and cultural heritage, and the support of cultural institutions.
- Education and innovation – Initiatives related to youth inclusion, quality education, road safety and the promotion of a culture of sustainability and sustainable development, educational workshops, scholarships.
- Environment – Initiatives related to the environment such as: climate change, circular economy, biodiversity, reforestation and forest conservation, coastal and marine conservation, water resources.
- Local communities and society – Initiatives related to social development, promoting well-being and mental health, diversity, combating poverty, food insecurity and inequalities.

# 04

## ROLES AND RESPONSIBILITIES

### 4.1 Sustainable Development Committee

It is a Committee of the Board of Directors of the Parent Company and is responsible for the control and preliminary approval of the Community Contributions Policy prior to final approval by the Board of Directors of the Parent Company.

### 4.2 Community Contributions Committee

The Parent Company has established a Community Contributions Committee<sup>1</sup>, which consists of representatives of:

- 1) Communication and Public Relations Division,
- 2) Sustainability Division,
- 3) Commercial Subsidiaries General Division, and
- 4) Refinery General Division.

Additionally, the Committee consists of the Coordinator/Secretary of the Community Contributions Committee, who participates with voting rights. The Community Contributions Committee is responsible for:

- i. the control and recommendation of the amount of the Group's Community Contributions budget prior to submission to the Sustainable Development Committee for approval,
- ii. the regular evaluation, control and case-by-case pre-approval of each Community Contribution Request in accordance with this Policy and
- iii. reporting to the Sustainable Development Committee on the amount of the contribution made by the Group in the previous year together with the number of requests.

### 4.3 Coordinator/Secretary of the Community Contributions Committee

The Community Contributions Committee is supported by a capable, specialized, and experienced Coordinator/Secretary to ensure it operates effectively and efficiently. The Coordinator/Secretary is a voting member of the Committee and is responsible for planning and organizing the meetings of the Community Contributions Committee, as well as keeping the corresponding summary minutes. They ensure the immediate, clear, and complete information of the Committee members and facilitate their communication with any interested party and/or senior management executives.

### 4.4 Community Contributions Management Team

It is responsible for the collection from the website of the requests for social contributions that are submitted and for the initial control and management of them. Submits the requests and related supporting documents that have been provided to the Community Contributions Committee.

### 4.5 Community Contribution - Action Plan Manager

The person from each company who undertakes the implementation of the specific Community Contribution and the monitoring of the Action Plan, where required.

# 05

## COMMUNITY CONTRIBUTION REQUEST

A Community Contribution request may be submitted by Individuals, Legal Entities of Public or Private Law, Foundations, Non-Governmental Organizations (NGOs) as well as by other organizations that are actively engaged in the areas mentioned in section 3 of this Policy.

The requests of interested parties for the Group's Community Contribution are submitted throughout the year by filling in a standardized form, which is available on the website of the Parent Company, in the "Sustainable Development" section (Community Contribution Request - Motor Oil (moh.gr)) and in which the following information must be completed:

- General information of the organization requesting a Community Contribution,
- Details of the contact person and
- Details of the submitted proposal.

During the evaluation of the request, the Community Contributions Committee may request additional documents and supporting material from the Applicant to substantiate the Request.

In exceptional cases, at the request of a member of the Board of Directors of the Parent Company, the Board of Directors may decide to approve a Community Contribution to a Non-Profit Organization. In this case, the decision of the Board of Directors describes the actions that the Organization is going to implement, while at the same time the other provisions of this Policy and especially those of section 7 are applied.

<sup>[1]</sup> The Community Contributions Committee operates without a permanent character within the meaning of Article 14 of Law 4706/2020.

# 06

## EXAMINATION, EVALUATION AND APPROVAL PROCEDURE

In the context of ensuring the process transparency and reliability, Community Contribution requests, after being submitted to the electronic platform, are collected by the Community Contributions Management Team for initial control and management. They are then submitted to the Community Contributions Committee which examines and evaluates the Community Contributions Requests submitted as well as all the supporting documents that are provided or may be requested afterwards for evidence.

To avoid any risk to the reputation of the Group, a general information and background check of the interested entity is made to ensure that there is no doubt as to the intention and duty of the recipient of the Community Contribution to use it properly.

In particular, the following are evaluated, depending on the status of the applicant:

- a)** If the articles of association, procedures, infrastructures, and operating conditions of the interested party objectively provide him with the possibility to implement the actions for which he has requested a Community Contribution,
- b)** If the interested party has received another sponsorship from the Group or from another organization and
- c)** If the interested party has a negative reputation.

The tax regime to which the Community Contribution will be subject is also checked.

After the evaluation of the Community Contribution request, the Community Contributions Committee recommends to the Vice President and CEO of the Parent Company for his agreement on the specific request and the prescribed approval process of the Group is followed.

Every request for a Community Contribution corresponding to an amount of more than Thirty Thousand EUROS (€30,000) must, after its approval, be accompanied by an action plan, in which the initiative and requested benefits are described in detail together with the objective, the input, the output and impact it will have on environmental, social and governance (ESG) issues. In these cases, an Action Plan Manager is designated by the company that undertakes the implementation of the specific Community Contribution.

# 07

## MANAGEMENT - IMPLEMENTATION - MONITORING

Depending on the type, complexity and amount of the Community Contribution, its management may, with the recommendation of the Community Contributions Committee or decision of the Parent Company's Board of Directors, be carried out through a third party, including a non-profit organization. In this case, the third party should be legally established and have the organizational capacity and procedures to ensure that it can effectively and transparently manage a Community Contribution of this type and amount.

In the case of sponsorships as well as in special cases following the recommendation of the Community Contributions Committee, the start of the disbursement to the recipient may require the signing of a relevant Agreement, which will define the sponsored actions, the terms and conditions, as well as the obligations on both sides between the recipient of the Community Contribution and the Group (Parent or Subsidiary Company).

The Sustainability Division will provide support for the completion of the action plans and monitor their application and implementation.

The recipients of Community Contributions from the Group are required to submit, whenever requested by the Group, all the necessary documentary evidence related to the implementation of their actions and the use of their resources.

The Community Contributions Committee may, on a case-by-case basis, request from the Action Plan Manager reports or accounting data for the execution of the Community Contribution granted. Recipients of Community Contributions are required to submit to the Action Plan Manager, upon request, all the necessary documentary evidence related to the implementation of their actions and the use of the resources allocated to them.

# 08

## BUDGET

A Community Contribution Budget (hereafter “CCB”) is provided, the amount of which results from the following formula:

$CCB = X\% \text{ of EBITDA}$

EBITDA: Earnings before interest, taxes, depreciation, and amortization

X: from 0.5% to 2%

If a company has negative EBITDA, the percentage will be applied based on the last year with positive EBITDA.

The CCB of each company within the Group is formulated at a minimum based on the aforementioned type. Following the recommendation of the Community Contributions Committee to the Group companies, their management must include it in their annual overall budget, which is duly approved. The number of contributions made by each company within the Group is monitored regularly during the fiscal year to ensure compliance with the approved CCB.

In addition, from the total CCB of each Subsidiary, 30% may be spent on the actions of the Group and 70% on the actions of the Subsidiaries. The scope of the CCB and the percentage of contribution to the Group’s actions can be reviewed on a case-by-case basis by the Management of each Subsidiary.

Any contribution paid in cash or in kind must be carried out in accordance with the Group’s standard payment and accounting procedure and must be recorded in the SAP accounting system in Community Contribution cost centers (to be verifiable).

# 09

## CANCELLATION OF COMMUNITY CONTRIBUTION

The Group reserves the right to unilaterally cancel the Community Contribution at any stage and in the event that its implementer is involved in any way in any event or incident, which may negatively affect the Group’s corporate reputation and profile.

# 10

## PUBLICITY

The Group may publicize the details of the recipient, the object, and the amount of the Community Contribution to him, through a listing on the website of the Parent Company or its Subsidiaries.



[www.moh.gr](http://www.moh.gr)



Motor Oil



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