

# GENERAL INFORMATION SECURITY POLICY



The company **"HELLENIC TRAIN - RAILWAY COMPANY SOCIETE ANONYME"**, with the distinctive title "HELLENIC TRAIN S.A.", is the main provider of rail passenger and freight transport in Greece. The Company provides its railway services using the network and the railway infrastructure owned by OSE and under the Regulatory Authority for Railways (RAS). The Company is a member of the International Union of Railways (UIC), the Community of European Railway and Infrastructure Companies (CER), the International Rail Transport Committee (CIT) and Forum Train Europe (FTE), actively participating in the international exchange of know-how and good practices. Furthermore, as the main provider of railway transport services in Greece, HELLENIC TRAIN S.A. is designated as an "essential entity" under Law 5160/2024, which incorporates the EU's NIS2 Directive.

The main objectives of the company include:

- The development, organization and operation of urban, suburban, regional, intercity and international passenger and freight rail transport, as well as all forms of transport via fixed-track systems.
- The development and operation of combined transport.
- The development and operation of bus transport, both domestically and abroad.
- The provision of supply chain management (logistics) services and related activities.
- The organization and provision of passengers' bed rest and catering services.
- The provision of consulting services and studies related to the company's activities.

HELLENIC TRAIN S.A., recognizing the importance of information protection and information systems security, has developed and implements an Information Security Management System (ISMS) in accordance with the requirements of the International Standard ISO 27001:2022, enhancing compliance with the legal and regulatory obligations of Law 5160/2024 and adhering to the highest standards of cybersecurity and resilience, to ensure the continuity of its critical services.

Information Security is a top priority of HELLENIC TRAIN S.A. and aims to:

- Comply with the applicable regulatory framework and relevant legislation.
- Safeguard the interests of the Company, partners, customers and all those who entrust their information to the Company.
- Ensure confidentiality, integrity and availability of information.
- Optimize the reliability and protection of the Company's information and technological assets.
- Ensure the resilience and continuity of its core services.
- Implement a holistic approach to risk management, covering both cyber and physical threats to its networks and information systems.
- Manage cybersecurity risks throughout the supply chain and third-party dependencies.
- Ensure the timely detection, management and reporting of significant incidents to the competent National Authorities.

The implementation of the Company's Information Security Management System aims to:

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- Prevent any internal or external threat, whether intentional or unintentional, that could affect the information systems, data and infrastructure managed by the Company.
- Systematically review and assess information security risks to ensure their prompt and appropriate management.
- Ensure access control, protection against viruses, external intrusions/attacks and the logging of security incidents.
- Provide regular training and awareness for personnel and management on information security issues.

The Management is committed to:

- The implementation of the Information Security Management System.
- Its continuous improvement in accordance with the requirements of the ISO 27001:2022 standard.
- The compliance of HELLENIC TRAIN S.A. with Law 5160/2024 (incorporation of the NIS2 Directive)

The Information and Communication Systems Security Officer (Y.A.S.P.E.) is responsible for the supervision, coordination and management of the Information Security Management System (ISMS).

All Company personnel involved in the Company's activities are responsible for complying with the Information Security Policies and related Procedures.

The Company's Management and personnel are devoted to information protection and are committed to achieving the objectives of the Information Security Management System (ISMS) and fostering an information security culture at all operational levels.

**On behalf of the Management**

**Athens, 30-10-2025**