



“LOOKING FORWARD”



SUSTAINABLE
DEVELOPMENT REPORT **2020**

 **ELLAKTOR**
GROUP

TABLE
OF CONTENTS

MESSAGE FROM THE MANAGEMENT	06
AT A GLANCE 2020	08

01	
ELLAKTOR GROUP	10
1.1 Group Presentation	11
1.2 Business Model	20
1.3 Materiality Analysis	24
1.4 Sustainable Development Goals	26
1.5 Stakeholder Engagement	29
1.6 Group Strategic Priorities and Targets	32

02	
CORPORATE GOVERNANCE AND OPERATION	42
2.1 Corporate Governance	43
2.2 Compliance	44
2.3 Risk Management and Business Continuity	47
2.4 Supply Chain	54

03	
INNOVATION AND DIGITAL TRANSFORMATION	56
3.1 Innovation	57
3.2 Digital Transformation	60

04	
EMPLOYEES	62
4.1 Working Environment	63
4.2 Health and Safety	72

05	
ENVIRONMENT	80
5.1 Contribution to the Greater Availability and Reliability of Renewable Energy Resources	81
5.2 Contribution to Circular Economy	86
5.3 Management of Environmental Footprint	90
5.4 Biodiversity	106

06	
SOCIETY	110
6.1 Creating Value for Society	111
6.2 Communicating with Local Communities	115
6.3 Social Investment	116

07	
APPENDIX	122
7.1 Report Methodology	123
7.2 GRI Standards Table	124
7.3 Athens Stock Exchange ESG Reporting Guide Table	133
7.4 UN Global Compact Table	135
7.5 SASB Table	136
7.6 Independent Limited Assurance Report	139

MESSAGE FROM THE MANAGEMENT

2020 was a year marked by many economic, political, and social challenges, with the unprecedented global health crisis at the centre of all. These challenges could not but also affect the ELLAKTOR Group, testing our readiness and resistance in extraordinary circumstances with significant consequences, both at a human and a business level.

From the very first moment, the Group's priority and commitment was the protection of its employees and partners. In this context, all foreseeable health safety measures were put in place, in accordance with the recommendations of the competent authorities, while all procedures for the facilitation of remote working were accelerated. At the same time, business continuity plans of all subsidiaries were adapted and immediately implemented, to ensure that projects and activities continued running smoothly and safely, both for the employees themselves and for the general public.

As an ally of the State and the competent authorities with regard to the management of the pandemic, the Group transitioned its commitment on a national scale and provided the NIMTS hospital with free waste management services and also supported the National Health System with donations of necessary hospital equipment.

Despite the difficulties, 2020 was a year of significant agreements and initiatives for the Group as a whole. Our initiatives were fully aligned with international developments in ESG issues, based on the Group's new Sustainable Development strategy, creating even more opportunities.

Regarding regulatory compliance issues, in 2020, a third party verified that all of the Group's activities follow the ISO 19600 guidelines. This validation confirms that, in its day-to-day operation, the Group complies with both legislation as well as its Code of Conduct and internal Policies.

With regard to human resources, utilizing the results of the employee engagement survey, in 2020 a series of actions were launched, that aimed to introduce and implement a new way of managing the Group's resources, ensuring their continuous growth and development. In addition, the Group's new Human Rights Policy, established in early 2021, will effectively safeguard the rights of the Group's employees, suppliers, partners and sub-contractors, as well as the local communities in which the company operates.

With respect to occupational health and safety, a number of targeted actions are planned and implemented in order to eliminate the risk of accidents in the Group's projects and activities, while at the same time tools were developed to continuously monitor our health and safety performance.

In the Renewable Energy Sources (RES) segment, 2020 was marked by the strategic cooperation with EDPR, for the joint development of RES power plants, with a total capacity of up to 900 MW. Through these projects the Group aims to increase the availability and reliability of renewable energy sources, to play an essential role in the energy transition, to support the decarbonisation of power generation towards ensuring access to clean and cheap energy for all.

“ Despite the difficulties, 2020 was a year of significant agreements and initiatives, fully aligned with international developments in ESG issues ”

In 2020, our Group generated a total of 1,250 GWh of electricity from RES, 5 times more than the 248 GWh of energy consumed for its operation, while also ensured the prevention of 2,035 thousand tons of CO₂ eq. emissions from being released into the atmosphere.

The Group's contribution to the transition to a Circular Economy and the reduction of solid waste disposed in landfills is also significant. In 2020, the Group treated more than 886 thousand tons of third-party waste in its plants, while managing 1,015 thousand tons of waste from public and private construction projects undertaken.

In the context of social contribution, in 2020, the Group continued supporting the local communities in the areas where it operates, emphasizing on improving local infrastructure and the citizens' quality of life, with investments that reached €4 million.

The next decade is full of challenges both in the internal and the external environment. The return to operating profitably requires dedication and vigilance from all. The challenge of digital transformation and the strengthening of innovation initiatives are our highest priority. The challenge of climate change and the European Green Deal have been integrated into our Roadmap for 2020-2025-2030, which is in the process of being finalised and will help us adapt and transform our operations in line with the conditions of the new era unfolding before us. At the same time, the Recovery Fund creates a favourable macro-economic environment for our country and our industry, in which we aim to regain a leading position.

The present report contains information about all actions implemented in 2020 within the Group and its companies, aiming at protecting and improving our operation, along with all actions planned to be launched and implemented in the near future. The Report was drafted in accordance with the guidelines of the Global Reporting Initiative (GRI), the Athens Stock Exchange ESG Reporting Guide, the Global Compact principles and the guidelines of the Sustainability Accounting Standards Board (SASB), while it was subject to third party validation for the first time.

On behalf of the Board of Directors of ELLAKTOR Group



George Mylonogiannis
Chairman of the BoD

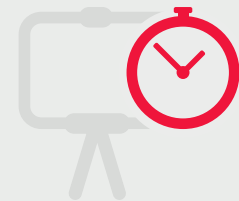


Efthymios Bouloutas
Chief Executive Officer

AT A GLANCE 2020



7,245 employees



43,297 hours
employee training



€ 195.6 mil.
employee benefits



247,850 MWh
of energy consumed

84%

of the Group's waste was utilised and did not end up in a landfill

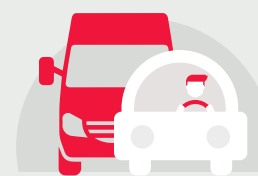
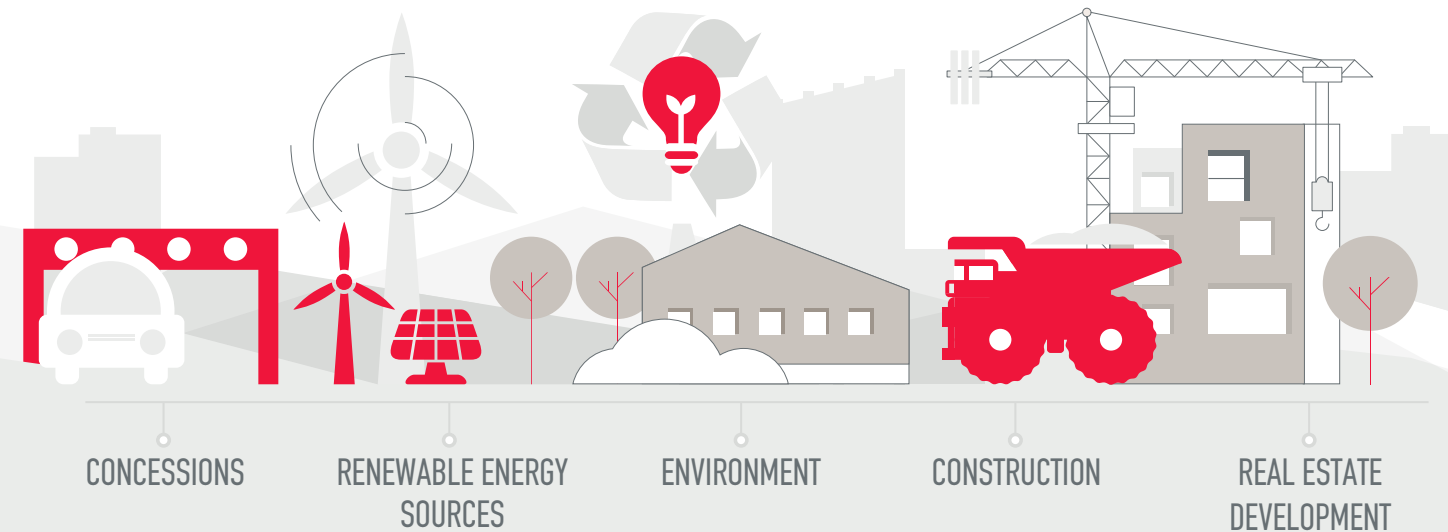


€ 3,971 thousand
invested in the local community

95%

of supplies procured from domestic suppliers

KEY SEGMENTS



79.9 mil. vehicles crossings
on Attiki Odos and Morea



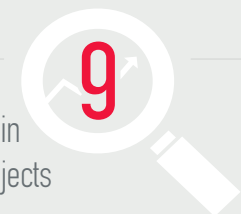
€ 1.8 bil. backlog
in Construction



4.1 mil.
Smart Park visitors

60% of the Group's turnover comes from certified companies in accordance with **ISO 14001:2015** and **ISO 45001:2018**

Participation in research projects



886 thousand tn of third-party waste under management in Environment Segment's facilities



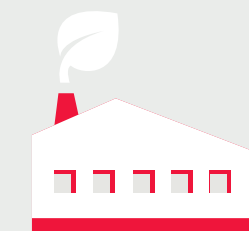
27 wind farms



539 MW capacity from RES

38%

of waste was utilised through processes of reuse, recycling, etc.



4 biogas exploitation plants



1,250 GWh electricity generation from RES

Note: The data refers to activity in Greece, Germany, Cyprus, Qatar, Romania and Jordan except for the financial data which refers to the total activity of the Group.

01 ELLAKTOR GROUP



Update of the business model



Development of a new tool for monitoring and recording sustainability (ESG) KPIs



Analysis of material topics with the first-time engagement of stakeholder representatives

ΕΘΝΙΚΗ ΠΙΝΑΚΟΘΗΚΗ
NATIONAL GALLERY



1.1 GROUP PRESENTATION

ELLAKTOR Group is the largest infrastructure group in Greece and one of the leading in Southeastern Europe, with international presence, **7,245¹ employees** and a **turnover of € 892.3 million** (Group financial results 2020). It consists of more than **100 subsidiaries**, more than **15 affiliated companies** and approximately **130 joint ventures**.

21 years after the triple merger of Elliniki Technodomiki, AKTOR and TEV, which led to the creation of ELLAKTOR, the Group is redefined by setting modern corporate governance as a cornerstone and by giving priority to enhancing Group operations, to reorganising its capital structure and to further capitalising on synergies, in order to provide increased added value to its shareholders, its employees and the Greek economy.

With **70 years of experience** and operations in **27 countries**, ELLAKTOR Group brought life into projects that accelerate growth and improve the quality of life in communities across the world.

All Group companies as well as the joint ventures, where the Group is a part of, are presented in the **Annual Financial Report 2020**.

¹ Including employees and hourly-paid employees in ELLAKTOR Group companies, as well as joint ventures, in Greece, Germany, Jordan, Qatar, Cyprus and Romania, in which the Group has a majority stake and/or has the management.

€ 892.3 mil. turnover

More than 100 subsidiaries

More than 15 affiliated companies

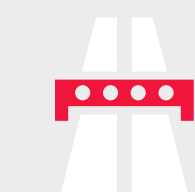
Approximately 130 joint ventures

Operating in 27 countries & 4 continents

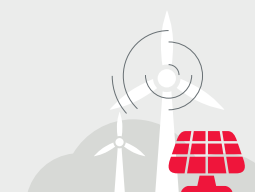
International Presence of ELLAKTOR Group



Key Segments



CONCESSIONS



RENEWABLE ENERGY SOURCES



ENVIRONMENT



CONSTRUCTION



REAL ESTATE DEVELOPMENT

Concessions

ELLAKTOR Group is active in the Concessions segment through its subsidiary, **AKTOR CONCESSIONS**, which is a leader in Greece. The Concessions segment possesses majority stakes in motorways, parking buildings and marines. The particular segment has vast experience that covers the whole spectrum of concessions activities, including financing, design, construction, maintenance and operation.

Main Group companies:

- **AKTOR CONCESSIONS SINGLE MEMBER S.A.**
- **ATTIKI ODOS S.A.**
- **ATTIKES DIADROMES S.A.**
- **MOREAS S.A.**
- **DEVELOPMENT OF NEW ALIMOS MARINA SINGLE MEMBER S.A.**

2020 Review



€ 202.4 million
turnover



775 km
of highways under the
management and operation
of the Group's companies



79.9 million
vehicle transits on Attiki Odos
and Morea



1,100 berths in Marina of
Alimos, the largest marina
in the Balkans

Important Events

In 2020, the revenues from the Concessions segment stood at € 202.4 million, compared to € 240.3 million in 2019, reduced by 15.8%. The decrease in revenues during the fiscal year 2020 is due to the reduced traffic (Attiki Odos -23.85%), as a result of the restrictive movement imposed by the government due to the COVID-19 pandemic.

In May 2020, AKTOR CONCESSIONS signed the concession agreement for the right to use, manage and operate the Alimos Marina for 40 years. On 1 January 2021, the Concession was launched with the aim of upgrading the Alimos Marina into one of the most modern marinas in Southeast Europe, with an investment of € 50 million for its development.

The concession of the right to use, commission, manage and operate the Alimos Marina is a strategic investment for AKTOR Concessions, considering that the particular marina is a point of reference, not only for the residents and visitors of the entire urban area, but also for the owners of private and professional crafts as well as for the entire Region of Attica.

Further information on the outlook, risks and uncertainties of the Concessions segment is presented in the **Annual Financial Report 2020**.



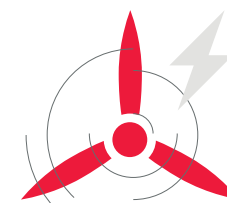
Renewable Energy Sources

ELLAKTOR Group is present in the Renewable Energy Sources (RES) segment through the parent company, **ELLAKTOR**, which develops, constructs, and operates wind farms. The RES segment, following its strategic investment plan, constantly expands its portfolio of projects by steadily increasing the installed capacity of the wind farms. Existing and under-construction wind farms are situated in selected locations, combining specific characteristics favourable to the operation of wind farms that show high rate of return.

Main Group companies:

- **ELLAKTOR S.A.**

2020 Review



2nd largest
wind energy producer
in Greece



24 wind farms
in operation



493 MW
installed capacity



88.2 MW
wind farms under
construction

Important Events

The turnover of the RES segment in 2020 amounted to € 93.9 million compared to € 64 million in 2019, marking an increase of 46.5%.

The total installed capacity of the RES segment stood at 493 MW as at 31.12.2020, of which 90 MW currently operate in trial mode. Two wind farms, with a total installed capacity of 88.2 MW, are still in the initial phase of construction.

Electrical power generation reached 1.042 GWh in 2020, marking an increase of 47.2% compared to 2019, due to a corresponding increase in installed capacity within 2020 of 53%. The average annual capacity factor for 2020 decreased by 4%, reaching 25.5% compared to 26.6% in 2019.

Further information on the outlook, risks and uncertainties of the Renewable Energy Sources segment is presented in the **Annual Financial Report 2020**.



Environment

ELLAKTOR Group's activity in the Environment segment is implemented through its subsidiary, **HELECTOR**, which is a vertically integrated company in the field of waste management and energy production. The valuable know-how and specialization of ELLAKTOR's Environment segment allows the Group to offer integrated solutions in waste management that include the design, construction and operation of up-to-date **waste treatment plants**, as well as of **alternative fuel production and biomass exploitation** projects.

Main Group companies:

- HELECTOR S.A.
- STERILIZATIONS S.A.
- APOTEFROTIRAS S.A.
- EDADYM SINGLE MEMBER S.A.
- SOLID WASTE RECYCLING S.A. (ASA RECYCLE)
- BEAL S.A.
- OSNABRUCK GmbH
- HELECTOR CYPRUS Ltd.

2020 Review



Important Events

The turnover of the Environment segment in 2020, amounted to € 102 million compared to € 87 million in 2019, marking an increase of 17%.

It is noted that the investment of the biogas energy utilisation unit, released by the Mavrorachi landfill, was completed in July 2020 and that the unit was electrified on July 27, 2020.

In 2020, HELECTOR and its subsidiaries signed a series of project contracts, either exclusively or as members of joint ventures, with the most notable of which representing projects with a total budget of around € 26 million.

Further information on the outlook, risks and uncertainties of the Environment segment is presented in the **Annual Financial Report 2020**.



Construction

ELLAKTOR Group is a leader in the Construction segment through its biggest subsidiary, **AKTOR**, with 70 years of experience in complex and demanding Infrastructure, building, and industrial projects, as well as in photovoltaic parks. The portfolio of the Construction segment consists of **bridges, motorways, metro projects, biological treatment plants, natural gas pipelines**, refineries, logistics buildings, shopping centres, office buildings, residential buildings, casinos, industrial buildings, tourist and hotel units, cultural centres, hospitals, airports, educational buildings, Olympic and athletic complexes, railway projects, tunnels, dams, port projects, energy production stations, electromechanical projects etc.

Main Group companies:

- AKTOR S.A.
- AKTOR F.M. SINGLE MEMBER S.A.
- TOMI S.A.
- HELLENIC QUARRIES S.A.

2020 Review



Important Events

The Construction segment recorded income of € 499 million in 2020, reduced by € 402 million compared to income of € 901 million in 2019. The withdrawal from countries with a negative economic return, the limited progress of projects in Greece due to COVID-19 and the liquidity of the Industry have contributed to the decline in revenue for the year 2020.

Further information on the outlook, risks and uncertainties of the Construction segment is presented in the **Annual Financial Report 2020**.



Real Estate Development

ELLAKTOR Group's operations in the Real Estate Development segment come through its subsidiary, REDS, which identifies properties with positive prospects and attractive pricing, in order to develop them into high quality ventures. The Real Estate Development segment focuses on **Retail Parks**, Entertainment Centres, **Residential Complexes**, Exhibition Centres, **Offices and Mixed Use Buildings**. In parallel, the Real Estate Development segment of ELLAKTOR Group provides services to third parties who need expert local consultancy and service provision. REDS can undertake the concept design, the support in the legal, urban, territorial and technical framework, for the development of large private investments, the development and construction management, the planning, lease strategy and real estate management, as well as feasibility studies and business plans.

Main Group companies:

- REDS S.A.
- YIALOU COMMERCIAL & TOURIST S.A.
- KANTZA EMPORIKI S.A.

2020 Review



€ 6.8 million
turnover



53,300 m²
total surface of Smart Park,
the largest retail park in
Greece



4.1 million
Smart Park visitors

Important Events

The Group's Real Estate Development segment recorded revenue amounting to € 6.8 million for 2020, compared to € 7.1 million for 2019, which translates into an decrease of 4.2%.

The segment's main activity for 2020 was the operation of the retail shopping Smart Park, in Yialou, Spata, Attica. The commercial operation of the 2nd Phase of the Commercial Park had a significant contribution to the revenues of the segment, despite the impact of COVID-19 pandemic.

Due to the measures to limit the spread of the COVID-19 pandemic, the Government suspended the operation of the shopping centres from 13 March 2020 until 4 May 2020, where the Park gradually resumed operation with a limited number of stores, and all the stores reopened on 11 May 2020. Moreover, in accordance with the provisions of law, leases of professional premises were exempt from the obligation to pay 40% of the total rent for the months of March, April, May, June, July, August, September, November and December 2020 (the exemption for the months of July, August, September 2020 was only applicable to catering, film screening and cultural businesses). As a result of the above, revenues from fixed rents for the months of March to December 2020 are reduced by € 1.3 million.

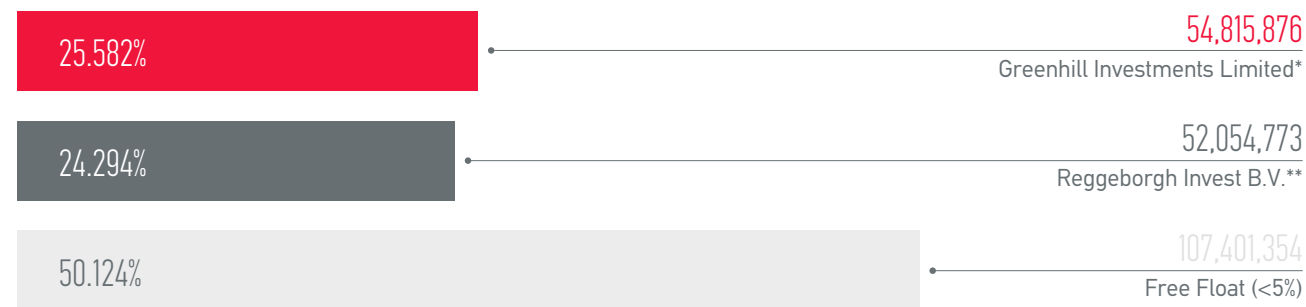
Further information on the outlook, risks and uncertainties of the Real Estate Development segment is presented in the **Annual Financial Report 2020**.



Shareholding

In June 2021, the Company's share capital amounts to € 8,570,880.12, divided into **214,272,003 shares**, with a nominal value of € 0.04 each.

All shares are ordinary, registered, voting shares, listed for trading on the main market of the Athens Stock Exchange, specifically in the "Constructions and Construction Materials" sector.



According to the last Notification of the Obligated persons (Law 3556/2007). Latest update 04.06.2021

* GREENHILL INVESTMENTS LIMITED is a company which is jointly controlled by Mr. Dimitrios Bakos and Mr. Ioannis Kaymenakis. The amended agreement of 13.01.2021 between AKRON TRADE AND TRANSPORT SA (company which is jointly controlled by Mr. Dimitrios Bakos and Mr. Ioannis Kaymenakis) and PEMANOARO LIMITED, all voting rights to which this agreement pertains (i.e. 20.5822% of the total voting rights, corresponding to 44,101,876 common registered shares in ELLAKTOR SA) shall be implemented in stages and on the respective dates which are mentioned on the relative announcement (15.01.2021) and with the due date until the end of 30.07.2021. On 02.06.2021 GREENHILL INVESTMENTS LIMITED acquired the remaining issuer's shares (agreement on 13.01.2021). Accordingly the participation of GREENHILL INVESTMENTS LIMITED exceeded the threshold of 25% (also the participation of Messrs. D. Bakos & I. Kaymenakis, indirectly, exceeded the threshold of 25%).

** On 10.09.2020, Reggeborgh Invest B.V. acquired a call option of 26,882,023 shares and voting rights of ELLAKTOR SA, which accounts for 12.55% of the total voting rights in ELLAKTOR SA. On 06.03.2021, the extension of the exercise period of the call option was signed, which is now between 1 and 240 days (ex.180 days) after 10.09.2020. The number of shares and number of voting rights (total positions) as a result of a potential exercise of the Call Option will be 27.34%. On 20.04.2021, Reggeborgh Invest B.V. acquired a new call option of 6,828,260 shares and voting rights of ELLAKTOR SA, with the exercise/conversion period from 20.04 to 20.07.2021. The number of shares and number of voting rights (total positions) as a result of a potential exercise of the new Call Option will be 30.53%. On 28.05.2021, Reggeborgh Invest B.V. acquired 20,355,840 (Call Option as agreed at 10.09.2020) shares and voting rights of ELLAKTOR SA and the positions reached the 24.29%. The number of shares and number of voting rights (total positions) as a result of a potential exercise of the new Call Option (agreed at 20.04.2021) will be 27.48%.

Memberships in Associations and Networks

The Group and/or its subsidiaries are members of Greek and international associations, organizations and bodies, with a view to contributing to the development of their industries, constantly improving the services provided, as well as managing, in the best possible way, the impacts from their operation.

• Hellenic Federation of Enterprises

The Hellenic Federation of Enterprises (SEV) represents Greek enterprises and industries and supports their interests at national and European level, through the respective European representation agency for enterprises and industries, BUSINESSEUROPE.

• SEV Business Council for Sustainable Development

The SEV Business Council for Sustainable Development was created in order to act as a strong and dynamic supporter of businesses that want to play a leading role in promoting Sustainable Development in Greek entrepreneurship. Members of the Council undertake to actively participate in its proceedings and to abide by a common Code of Sustainable Development Principles, which must be applied and constantly improved and adjusted.

ELLAKTOR Group is one of the Council's founding members, while the Chair of Group's Board of Directors, is Vice-Chairman of SEV's Business Council for Sustainable Development, Board of Directors.

• CSR Hellas

This is a non-profit network of enterprises. Its purpose is to promote the concept of Corporate Social Responsibility and showcase it within the business and social environment. ELLAKTOR GROUP and ATTIKI ODOS are members of CSR Hellas.

• United Nations Global Compact

The UN Global Compact promotes, on a global scale, the adoption of the Global Compact's world renowned 10 principles, on human rights, labour, environment and anti-corruption.

AKTOR and ATTIKI ODOS have become signatories to the Global Compact since 2008. In 2019, ELLAKTOR Group pledged to uphold the Global Compact principles, throughout all sectors of its operation and while interacting with its stakeholders. ATTIKI ODOS, as a subsidiary of the Group, is represented by the Group in the International Organisation and is now a member of the local network (Global Compact Network Hellas).

• Global Compact Network Hellas

Global Compact Network Hellas promotes the UN Global Compact principles in Greece. It is an independent and self-governing entity, which works in close collaboration with the UN Global Compact in New York, and acts as a point of contact for all its members.

ELLAKTOR Group is one of the founding members of the Global Compact Network Hellas and ATTIKI ODOS has been a member since 2019.

• Hellenic Association of Toll Road Network – HELLASTRON

ATTIKI ODOS and ATTIKES DIADROMES are members of the Hellenic Association of Toll Road Network – HELLASTRON, in which all modern motorways and facilities with tolls operating in Greece participate in, aiming to promote professional, scientific, research, social and educational topics relating to road transportation in Greece.

• Federation of Recycling and Energy Recovery Industries and Enterprises (SEPAN)

HELECTOR is a member of the Federation of Recycling and Energy Recovery Industries and Enterprises (SEPAN) and holds a position in the federation's Board of Directors. SEPAN was created to promote the advantages of adopting a circular economy business model, through actions related to recycling and energy recovery from waste, aiming to strengthen the sustainable development of the country.

• Panhellenic Association of Environmental Protection Companies (PASEPPE)

ELLAKTOR is a member of the "Panhellenic Association of Environmental Protection Companies" (PASEPPE), which aims for the cooperation of companies operating within environmental protection and waste management. Through the cooperation of members, issues related to the Institutional framework of waste management and environmental protection as well as the implementation of national legislation are being addressed.

• Hellenic Wind Energy Association (HWEA)

ELLAKTOR is a member of the Hellenic Wind Energy Association (HWEA). HWEA, since its establishment, has been a member of the European Wind Energy Union, Wind Europe, and operates as its National Representative in Greece. It aims for the promotion of science and research in the field of wind energy, while at the same time it tries to effectively represent the well-known interests of the industry and the market, acting as a platform for thoughts, dialogue and ideas with scientific documentation and adequacy.

Finally, the companies ATTIKI ODOS S.A., and ATTIKES DIADROMES S.A., participate in a number of associations and international organizations including the Association of S.A. & Limited Liability Companies, the IBTTA (International Bridge, Tunnel and Turnpike Association), the U.S. TRB (Transportation Research Board of the National Academies), the ERTICO-ITS Europe, the Road Safety Institute "Panos Mylonas", the Association of Greek Transport Specialists (Hellenic Transport Association), (ICCS), ITS Hellas, EIEP (Hellenic Customer Service Institute), as well as the IRF (International Road Federation), which ATTIKES DIADROMES S.A. act as chair for the period from May 2019 to May 2022.

1.2 BUSINESS MODEL

The last few years, ELLAKTOR Group has placed the active contribution and substantial promotion of sustainable development, at the core of its business activities. Supporting the Greek economy, safeguarding a safe and fair working environment, reducing the impacts of its activities on the environment, investing in Renewable Energy Sources (RES) and in municipal waste management projects, supporting the local communities in which it operates

are some of the Company's main sustainable development initiatives and commitments.

The Group systematized its efforts in all of those areas, aiming to increase its positive impact on the economy, society and the environment, thus creating added value for all of its stakeholders.

Strategy

The Management's aim is to further establish the Group's leading position in the Concessions, Renewable Energy Sources and Environment segments, while at the same time leveraging its competitive advantage and know-how from the Construction segment, which places ELLAKTOR Group amongst the leading infrastructure groups in Greece and southeast Europe.







Having accumulated considerable expertise in the most complex and demanding projects, ELLAKTOR Group combines its 70 years of experience with cutting-edge technological developments, promoting projects that accelerate development and improve the quality of life of people around the world.

Our Vision

ELLAKTOR Group seeks to develop projects that are growth drivers and help improve peoples' quality of life,

in the areas where it operates, and to evolve into a dynamic and sound actor that supports and promotes sustainable development at all levels.

Our Values

	Ethics	Our conduct is ethical and promotes transparency and open communication
	Collaboration	We encourage teamwork, constructive collaboration and collective accountability
	Respect	We respect diversity and provide equal opportunities in the workplace
	Health and Safety	We commit to promoting a safe working environment
	Innovation	We value agility, innovation and an entrepreneurial spirit
	Environmental and Social Responsibility	We acknowledge our environmental responsibility and act in ways that reduce the impact of our activities on the environment and local communities

Sustainable Development Pillars

The Sustainable Development Division was established, at Group level, and its main aim and responsibility includes, among others, the development of a Group (and Group companies) sustainable development and social investment strategy. Its main responsibilities include the supervision and support of the Group companies' activities on the specific field as well as on environmental and energy management issues.

At the same time, the establishment of a new electronic platform is being developed, through which basic quantitative data related to the companies' sustainable development issues at a project/activity level will be collected. The Group aims to enhance transparency and to continuously improve its performance towards the issues that fall under the five recognized key strategic pillars of sustainable development.

In 2020, the detailed tracking of the Group companies' performance on sustainable development issues continued, alongside the development of a new tool for monitoring and recording key performance indicators in accordance with recognized international and national standards such as GRI, SASB, Bloomberg Gender-Equality Index and the ESG Information Disclosure Guide of the Athens Stock Exchange.

The results of the recent (early 2021) materiality analysis, presented below, are in line with the Group's strategy and the goals and priorities of sustainable development that have been set, both for the Group and for the individual companies.

At Group level, the following five strategic pillars have been identified:

5 Sustainable Development Pillars of the Group



It is noted that in 2020, having as a driver the most accurate and clear reflection of the Group's approach, the fifth strategic pillar was integrated. The pillar relates to the support of the local communities, as the Group aims to further highlight the importance of maintaining harmonious relations between its companies and the local communities in which they operate.

Starting from the main priority pillars concerning sustainable development, in 2019, the Group identified individual areas per pillar and set short-term (2020) and medium-term (2022) targets, to monitor Group's progress and performance. Furthermore, in 2020, under the coordination of the Sustainable Development Division, the Road Map for Sustainable Development for the period 2020-2025 was created, encompassing measurable targets. The Road Map is under approval by the Group's Management.

ELLAKTOR Group Business Model



1.3 MATERIALITY ANALYSIS

Aiming to strengthen its Sustainable Development Strategy, ELLAKTOR Group, reviewed and updated its material topics, which also reflect the most significant impacts of its activities on the wider economy, society and the environment.

Identification of Material Topics

The Group updated the most material topics related to its activities by reviewing the following:

- International and sectoral sustainable development standards such as the GRI standards and the GRI Construction Sector Supplement, the SASB standards and the ESG Reporting Guide of the Athens Stock Exchange
- Sustainable Development Reports of similar companies
- Publicity from the last three years (2018-2020) related to the ELLAKTOR Group and its subsidiaries
- Internal documents (e.g. policies, strategies, management systems, operating standards, etc.)
- United Nations Global Sustainable Development Goals (SDGs)
- Principles of the United Nations Global Compact

Evaluation and Prioritisation

Senior members of ELLAKTOR Group's Management were invited to evaluate and prioritize the 22 material topics based on the following criteria:

- impact significance (positive or negative) of the topics on the wider economy, society and the environment and consequently, on the achievement of the UN Sustainable Development Goals
- impact significance (positive or negative) of the topics on the ability of the Group and its companies to fulfil their business targets, or on their reputation

- highest priorities and future challenges of the sector

Moreover, in order to identify the needs and expectations of stakeholders, for the first time, representatives of all Group stakeholders, exempting Shareholders and Bondholders, were invited for the first time to participate in a survey for the evaluation of the material topics. The survey was conducted through an electronic anonymous questionnaire and involved about 587 representatives.

The results from the senior management members and stakeholders evaluation are illustrated below.

Material topics for ELLAKTOR Group

1. Creation and distribution of economic value
2. Safeguarding regulatory compliance and business ethics
3. Safeguarding occupational health, safety and wellbeing of employees (including subcontractors' employees)
4. Contribution to greater availability and reliability of renewable energy sources and to energy transition and the decarbonization of electricity generation
5. Reinforcing innovation and digital transformation
6. Safeguarding health, safety and positive experience of end users and structural integrity and safety
7. Ensuring business continuity and emergency preparedness
8. Safeguarding human rights at the workplace
9. Reducing consumption of non-renewable energy sources and improving energy efficiency, as well as reducing and offsetting greenhouse gas emissions and other gaseous pollutants (e.g. NOx, SOx, VOCs)
10. Contribution to the circular economy with the design, construction and operation of modern waste treatment plants
11. Provision of employee training, evaluation and development
12. Improving the social and environmental impacts of suppliers, partners and subcontractors
13. Creating high-quality employment opportunities (full-time, for high- and/or low-skilled workers, with satisfactory remuneration)
14. Attracting investors that place emphasis in Group's performance on ESG (Environment, Social, Governance)
15. Continue strengthening relations with local communities and responding to their needs
16. Identifying financial and operational climate change impacts (risks and opportunities)
17. Protection and preservation of biodiversity
18. Contribution in the improvement of the urban and built environment
19. Reducing solid waste and enhancing circular economy practices
20. Improving raw and other materials efficiency
21. Reduction of water consumption and effluents
22. Reduction of noise emissions



● Priorities and future challenges of the sector according to the Group Management

1.4 SUSTAINABLE DEVELOPMENT GOALS

The Group has adopted the United Nations 2030 Agenda, represented by the 17 Sustainable Development Goals for 2030. The Group's priority is to achieve the goals that are directly linked to the activities and challenges specific to its segments of operation, and to the material topics arising from its operation.



Sustainable Development Goals

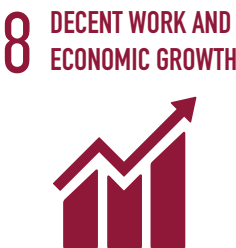


Group's Contribution

The Group invests in the well-being of its people, in shaping a good working environment and in ensuring its employees' Health & Safety, as well as that of its sub-contractors' employees. The Group's companies apply the practices outlined by the relevant Health and Safety Management Systems, to their offices and construction sites as well as to the projects they develop. They identify risks and take precautionary measures to eliminate accidents and health incidents.



ELLAKTOR Group is active in the field of Renewable Energy Sources (RES) and contributes to the mitigation of climate change and access to cheap and clean energy for all, emphasizing the development, construction and operation of wind farms, as well as the utilization of bio-energy. With respect to the Group's main goal of further contribution to the reduction of greenhouse gas emissions, it makes significant investments to increase the availability and reliability of RES.



ELLAKTOR Group, leveraging its diversified portfolio of activities, focuses on the development of new and innovative projects, that contribute towards developing and improving quality of life. The Group supports the Greek economy and creates value that is distributed to society. It creates mutually trusting relationships and supports local communities in which it operates.

In parallel, aiming at the engagement and the well-being of employees, as well as the creation of a working environment conducive to employees' personal and professional development, the Group has pursued specific actions: the creation of quality full-time employment opportunities of low and/or high specialisation with adequate remuneration, the provision of equal opportunities for all, avoiding any discrimination regarding gender, age, nationality, beliefs and physical ability, as well as the selection of personnel using meritocratic and reliable methods.

Sustainable Development Goals



Group's Contribution

ELLAKTOR Group builds infrastructure projects which contribute towards the sustainable development and strengthening of local communities. At the same time, it invests in the development of modern technologies, capitalizing on the benefits of the internet, digital media and new technologies. It uses technology to optimize its operation as well as modernise its projects.



ELLAKTOR Group, through its activity in the Concessions, Construction and Real Estate Development segment, has set a target to implement and operate projects that contribute towards increasing urban citizens' well-being and creating a friendly and sustainable urban environment. It analyses and evaluates the risks pertaining to its operations and projects and takes precautionary measures, in order to minimise risks, manage emergency situations and ensure the cities' uninterrupted operation. It aspires to help create cities with opportunities for all, access to basic amenities, energy and transport, and with safe road networks, resilient to climate change and natural disasters.



ELLAKTOR Group contributes towards the enhancement of circular economy, through its activity in the Environment segment, where it focuses on waste management, the separation and utilisation of recyclable material, the production of alternative fuels and the exploitation of biogas.

In addition, it takes measures to reduce and effectively manage the waste generated from its operation.



ELLAKTOR Group supports national efforts for the transition to a low carbon economy and recognises the positive opportunities of the RES market, by intensifying its actions for the increase of its wind farms' installed capacity and invests in further expanding its activities in the RES segment. It also aims to reduce its energy consumption from non-renewable sources.



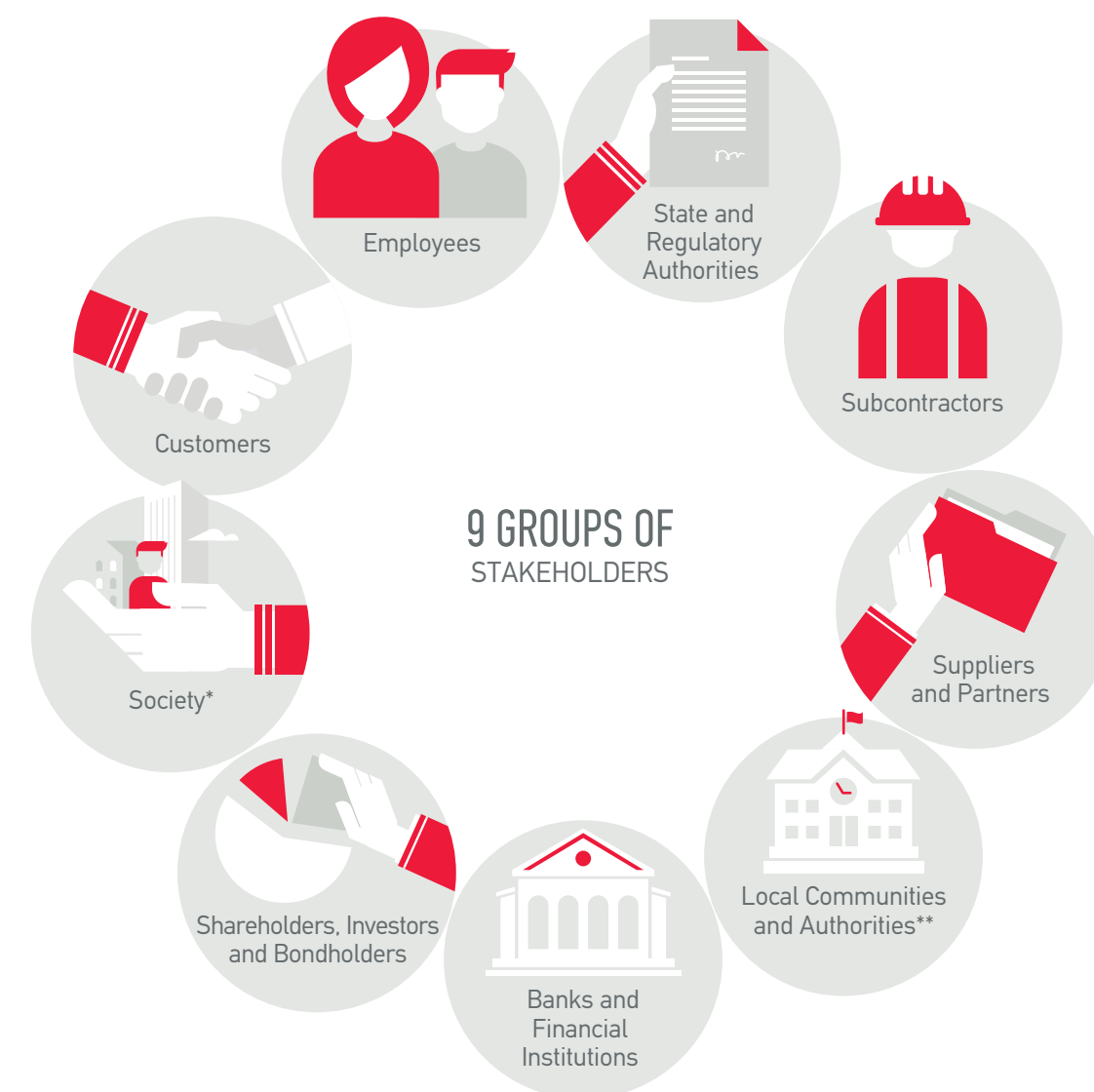
ELLAKTOR Group seeks to conduct its business according to the principles of business ethics and in compliance with applicable laws and regulations. It has developed and adopted a Code of Conduct, an Ethics and Compliance Program, as well as policies and procedures to effectively deal with ethics and compliance issues.

In parallel, ELLAKTOR Group has an active participation in organisations and initiatives that aim to promote sustainable development.

1.5 STAKEHOLDER ENGAGEMENT

For ELLAKTOR, the systematic and essential two-way communication with its stakeholders, is the basis for the evaluation and planning of its actions and practices, and for dealing with day-to-day challenges.

The Group recognises as its stakeholders those groups that directly or indirectly affect and are affected by its activities. Stakeholders belong either to the Group's internal environment (shareholders, bondholders, employees) or external environment (suppliers, customers, associates).



*Media, NGOs, civil society organisations

**Local media, local NGOs, local authorities, local civil society organisations

At ELLAKTOR Group, our key concern is to establish mutual trust and excellent cooperation with our stakeholders, while taking great care to addressing the different expectations and demands of each stakeholder group. In this context, as presented in the table below, separate

channels of communication with each stakeholder group have been established. In addition, the Group invites its stakeholders to participate in the evaluation survey of the material topics for sustainable development, the results of which contribute to the shaping of the Group's strategy.

Stakeholders	Key Requirements	Means of Communication
 <p>Employees</p>	<ul style="list-style-type: none"> Employees wish to work in a safe environment, earn a competitive salary, enjoy advancement opportunities within the Group and be treated with respect and meritocracy. They also want to know the Group's activities and their developments. 	<ul style="list-style-type: none"> Constant and direct communication via the Group's intranet for all developments and changes. Continuous communication with the Group's Human Resources Division, depending on the needs that arise. Open door policy for communication among each Director and their team, including group and personal meetings depending on the needs that arise.
 <p>Customers</p>	<ul style="list-style-type: none"> Our customers want to have an excellent cooperation with the Group in all areas and to receive quality projects and services according to the agreed specifications and timelines. 	<ul style="list-style-type: none"> Direct communication through the persons responsible for each project/area of operations, on a consistent basis and as needed by the customer.
 <p>Shareholders, Investors and Bondholders</p>	<ul style="list-style-type: none"> They are interested in the Group's profitability, the business developments in its areas of operations, as well as its performance in social and environmental topics. They also wish to ensure the Group's viability and implementation of strict Corporate Governance standards and principles. 	<ul style="list-style-type: none"> Constant updates with announcements, press releases and presentations, through the website and the Media, as well as annually through the Group's Sustainable Development Report. Continuous communication with Group Investor Relations. Meetings with the Management and Financial Division of the Group, ad hoc depending on needs.
 <p>Banks and Financial Institutions</p>	<ul style="list-style-type: none"> The Banks that the Group cooperates with, wish to have timely updates on financial and business developments. They also wish to ensure the Group's viability and implementation of strict Corporate Governance standards and principles. 	<ul style="list-style-type: none"> Constant updates with announcements, press releases and presentations, through the website and the Media, as well as annually through the Group's Sustainable Development Report. Meetings with the Management and Financial Division of the Group, ad hoc depending on needs.

Stakeholders



Local Communities and Authorities

Key Requirements

- Local community members and local authority officials (local media, local NGOs, local civil society organisations) in the areas where the Group operates are interested in employment opportunities, as well as in the Group's activities on issues of common interest, such as environmental protection and social support.

Means of Communication

- Constant communication with local Project managers, depending on needs as well as annually through the Group's Sustainable Development Report.



Subcontractors

- They wish to have a consistent, profitable and long-term relationship with the Group in all areas. Moreover, they want their employees to work in a safe environment.

- Direct communication through the Site Managers of each activity, continuously and as needed.



State and Regulatory Authorities

- They are interested in the lawful and responsible operation of the Group, environmental protection, social actions, the respect and protection of employees' rights, as well as employees' Health and Safety.

- Constant updates with announcements, press releases and presentations, through the website and the Media, as well as annually through the Group's Sustainable Development Report.

- Direct communication through the Project Managers of each activity, and through meetings with Management, ad hoc depending on needs.



Society

- Society's members (media, NGOs, local civil society organisations) wish to be updated on any changes of the Group's Sustainable Development activities, the financial, environmental and social aspects, and the business developments and activities of the Group.

- Constant updates through announcements, press releases and presentations, through the website and the Media, as well as annually through the Group's Sustainable Development Report.

- Meetings with the Group's Corporate Communication Division in regards to Media, ad hoc depending on needs.

- Meetings with the Group's Sustainable Development Division, in regards to NGOs and civil society organizations depending on needs.



Suppliers and Partners

- Suppliers and partners wish to have a consistent, profitable and long-term relationship with the Group in all areas.

- Direct communication through the Procurement Managers of each activity, ad hoc depending on needs.

1.6 GROUP STRATEGIC PRIORITIES AND TARGETS

The main targets for 2020, their achievement status, and the medium-term targets for 2022 are presented by priority pillar and thematic unit (field).

Business Ethics



Topics	2020 Targets and Achievement Status	Medium-term Targets (2022)
Ethical business practices	<ul style="list-style-type: none"> Align the Group's Compliance System with the guidelines of ISO 19600:2014. 100% Completed, see section Compliance. Develop an anti-bribery management system and obtain certification in accordance with ISO 37001:2016 for ELLAKTOR and AKTOR CONCESSIONS. 100% Completed, see section Compliance. 	<ul style="list-style-type: none"> Develop an anti-bribery management system and obtain certification in accordance with ISO 37001:2016 for all of the Group's main companies. Perform training for 100% of the Group's employees on regulatory compliance issues.
Management of information and personal data	<ul style="list-style-type: none"> Complete Data Protection Impact Assessments (DPIA), where applicable. 100% Completed, see section Compliance. 	<ul style="list-style-type: none"> Develop an information security management system and obtain certification in accordance with ISO/IEC 27001:2013 for ELLAKTOR.
Procurement management and cooperation with suppliers and sub-contractors	<ul style="list-style-type: none"> Implementation of a Group Procurement Policy. 80% In progress, see section Supply Chain. Establish centralised procurement. 70% In progress, see section Supply Chain. Develop and implement detailed systematic recording and traceability of the Group's purchased materials and services. 25% In progress, see section Supply Chain. 	<ul style="list-style-type: none"> Integrate sustainability criteria in the evaluation process of significant suppliers, partners, and subcontractors.






Topics	2020 Targets and Achievement Status	Medium-term Targets (2022)
Business continuity	<ul style="list-style-type: none"> Develop business continuity management system for the Group's critical operations. 65% Some of the systems (telecoms, email, electronic files) have been completed, while the ERP system is in progress. 	<ul style="list-style-type: none"> Develop a comprehensive Group strategy regarding business continuity.
Sustainable Development Strategy	<ul style="list-style-type: none"> Establish key performance indicators for all of the Group's material issues. 100% Completed, see section Business Model. Develop a three-year plan including measurable improvement targets and sustainable development initiatives per segment. 80% In progress, see section Business Model. 	
Policies and procedures		<ul style="list-style-type: none"> Develop and implement a central management system for policies and procedures.
Stakeholders	<ul style="list-style-type: none"> Conduct a stakeholder engagement survey to record and evaluate stakeholders' needs and expectations on sustainable development issues and subsequently incorporate them in the Group's materiality analysis. 100% Completed, with stakeholders' participation in the materiality analysis survey at the beginning of 2021. See section Materiality Analysis. 	<ul style="list-style-type: none"> Develop and implement an annual stakeholder engagement plan relevant to Group's key stakeholders.

Employee Health, Safety and Development





Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Enhancement of company culture	<ul style="list-style-type: none"> Strategically align the vision, mission, values and behaviours which represent the Group's culture. 0% Postponed for 2021. Develop a Human Resources policy. 50% In progress. Analyse results from the Employee Engagement Survey and develop actions in order to improve results. 80% In progress, see section Working Environment. 	<ul style="list-style-type: none"> Implement initiatives for the adoption of a uniform Group culture and values throughout the Group's activities and companies. Create and implement an Employer Branding action plan. Implement Employee Engagement Survey every two years.
Training	<ul style="list-style-type: none"> Complete Training plan for all Group employees. 70% In progress, see section Working Environment. Develop an online training platform. 50% In progress, see section Working Environment. Systematically record the trainings conducted at project and activity level. 20% In progress, see section Working Environment. 	<ul style="list-style-type: none"> Complete the development of the Leadership Training Academy. Perform Reskilling and Upskilling for executives in order to acquire necessary skills for the transition to the digital age. Full recording of all training activities in the new Human Resources information system.
Evaluation and development	<ul style="list-style-type: none"> Evaluate the performance of 100% of employees working at the Group's Head offices and managerial positions in projects/activities, in accordance with the new evaluation system. 80% The participation rate reached 79%, see section Working Environment. 	<ul style="list-style-type: none"> Evaluate 100% of Group employees' performance.

Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Evaluation and development	<ul style="list-style-type: none"> Develop an employee potential evaluation process. 50% In progress. 	<ul style="list-style-type: none"> Implement a "360 Feedback" evaluation process for division/department/project managers. 75% of promotions to be covered through the internal employees' potential evaluation process
Employee Benefits	<ul style="list-style-type: none"> Establish a retirement plan for all Group executives. 100% Completed, see section Working Environment. 	<ul style="list-style-type: none"> Develop a procedure for employee rewards in the form of bonuses. Increase the number of benefits (e.g. restaurant coupons, awards to employees with long tenure, etc.).
Attracting new employees	<ul style="list-style-type: none"> Participate and support events that connect young people with the labour market. 0% Postponed to 2021. 	<ul style="list-style-type: none"> Develop an internship program for university students.
Increase of diversity	<ul style="list-style-type: none"> Record and assess existing employees, with respect to gender and age. 100% Completed, see section Working Environment. 	<ul style="list-style-type: none"> Develop a plan targeted towards increasing gender and age equality in the Group's workforce.
Employee well-being		<ul style="list-style-type: none"> Develop a program that will enhance employees' well-being.
Employee volunteering	<ul style="list-style-type: none"> Organise a voluntary blood donation event at the Group's Head offices. 0% Not applicable due to the pandemic. Postponed to 2021, if and when conditions allow. 	<ul style="list-style-type: none"> Develop an employee volunteering action plan.
Strengthen occupational health and safety culture at all levels	<ul style="list-style-type: none"> Develop and implement a Group Occupational Health and Safety Policy. 90% The Group companies apply common policies and procedures relating to the management of health and safety at work, with the exception of RES segment (in progress). 	<ul style="list-style-type: none"> Develop and implement a procedure for on-site inspections of projects/activities regarding safety issues, by management executives.




Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Strengthen occupational health and safety culture at all levels	<ul style="list-style-type: none"> Assign a Health and Safety Manager for all of the Group's companies/projects/activities.  87% In progress, see section Health and Safety. Assign a team for the investigation of accidents and near-misses per segment and develop training material based on the results of the investigation.  100% Completed, see section Health and Safety. Develop and implement daily 15-minute safety sessions for all of the Group's projects and activities, where supervisors discuss and disseminate safety messages, with the participation of all employees working on projects.  50% In progress, see section Health and Safety. 	<ul style="list-style-type: none"> Develop initiatives, such as Safety fora, Safety Champions and awareness campaigns for all Group projects and activities.
Training on Health and Safety	<ul style="list-style-type: none"> Train all executives and employees in managerial positions on occupational health and safety issues.  20% In progress, see section Health and Safety. 87% of the Group's Health and Safety Managers for projects/activities were trained in matters that fall within their competence. Carry out training on technical issues in all Group segments by certified bodies.  60% In progress, see section Health and Safety. 	

Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Training on Health and Safety	<ul style="list-style-type: none"> Systematically monitor and record the trainings carried out for employees hired by subcontractors.  25% In progress, see section Health and Safety. 	
Health and Safety inspections	<ul style="list-style-type: none"> Increase audits of subcontractors.  10% In progress, see section Health and Safety. Conduct internal audits for 60% of the Group's projects.  60% In progress, see section Health and Safety. 	<ul style="list-style-type: none"> Conduct internal audits for 100% of the Group's projects and activities, annually.
Monitoring health and safety performance	<ul style="list-style-type: none"> Implement Monthly Safety Reports and a Health and Safety Inspection List for all Group projects and companies.  45% In progress, see section Health and Safety. 	<ul style="list-style-type: none"> Achieve zero accidents.
<div>Innovation</div> 		
Process automation	<ul style="list-style-type: none"> Automate Human Resources' procedures, as well as site and supplier reports, which require significant handling of paper and physical presence for signatures.  40% Automation of procedures, such as staff evaluation, materials and service purchase requests, etc. is in progress. 	<ul style="list-style-type: none"> Automate building management procedures. Install Document Control software in the construction sites of large projects.

Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Process automation	<ul style="list-style-type: none"> Implement and operate Management Reporting applications.  30% In progress, a specialized Business Data platform has been created, which collects data from different information systems, providing administrative information.	<ul style="list-style-type: none"> Enhance the management information system, using Business Intelligence tools.
Enhance remote working	<ul style="list-style-type: none"> Utilise video conferencing and interaction software on specific projects, in order to ensure that remote working can be carried out.  100% The Microsoft Teams platform for remote work has been fully implemented.	

Low Carbon Economy



Increase of investments in RES	<ul style="list-style-type: none"> Strengthen RES portfolio by increasing the number of wind farms, photovoltaic parks and biomass exploitation projects.  100% Completed, see section Contribution to the Greater Availability and Reliability of Renewable Energy Resources .	
Contribution to circular economy	<ul style="list-style-type: none"> Improve recovery rates of recyclable materials in treatment plants.  100% The total recovery rate has improved to 1.13%.	<ul style="list-style-type: none"> Further increase the number of investments in innovative waste management technologies.
Monitoring performance on environmental issues	<ul style="list-style-type: none"> Implement a uniform methodology regarding the monitoring and record of environmental performance indicators.  100% Completed, see section Management of Environmental Footprint .	<ul style="list-style-type: none"> Monitor and record subcontractors' environmental performance.

Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Monitoring performance on environmental issues	<ul style="list-style-type: none"> Monitor and record the performance of 100% of Group projects/activities in Greece.  100% Completed, see section Management of Environmental Footprint .	
Environmental inspections	<ul style="list-style-type: none"> Conduct on-site internal audits for 33% of the Group's projects/activities.  88% Internal audits were carried out in 29% of the Group's projects/activities, during the year. In progress, see section Management of Environmental Footprint .	<ul style="list-style-type: none"> Conduct on-site internal audits for all Group projects/activities within the 2020-2022 period.
	<ul style="list-style-type: none"> Develop a tool that will enable the remote audit of Group's projects/activities.  100% Completed. Pilot testing of the tool at AKTOR and training of Environment and Energy Project Managers during its use. The measure will be extended to other Group companies in 2021.	
	<ul style="list-style-type: none"> Develop an Environmental Management System and obtain certification in accordance with ISO 14001 for ELLAKTOR (RES segment) and HELLENIC QUARRIES accordingly.  30% Environmental Management System Development for HELLENIC QUARRIES (certification expected within 2021).	
Training and raising awareness on environmental issues	<ul style="list-style-type: none"> Train all employees based at construction sites, on environmental and energy management issues.  4% The development of an eLearning platform is in progress, through which training will be provided for all employees.	<ul style="list-style-type: none"> Establish an annual training and awareness plan on environmental and energy issues for all Group employees.

Topics	2020 Target and Achievement Status	Medium-term targets (2022)
Biodiversity	<ul style="list-style-type: none">Implement bird monitoring programs in significant biodiversity areas, where projects/activities are located, especially during the birds' breeding season as well as during the spring and autumn migration periods. <div><div></div><div>100%</div></div> <p>Completed, see section Biodiversity.</p>	

Local Communities Support

Social contribution	<ul style="list-style-type: none">Develop a Group Policy for donations (cash or in-kind) and sponsorships to support local communities. <div><div></div><div>0%</div></div> <p>Postponed to 2021.</p>	
---------------------	---	--

It is noted that the progress regarding the achievement of the goals, that have been postponed to 2021 or were not fully achieved in 2020, will be included in the Group's Sustainable Development Report for 2021.

The medium-term goals set for 2022 are in the process of being updated and approved by the new Group Management. The changes that may occur will be presented in the 2021 Report.



02 CORPORATE GOVERNANCE AND OPERATION



New Board of Directors



Continuity of business during the COVID-19 pandemic



Group Procurement Policy

11 SUSTAINABLE CITIES AND COMMUNITIES



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



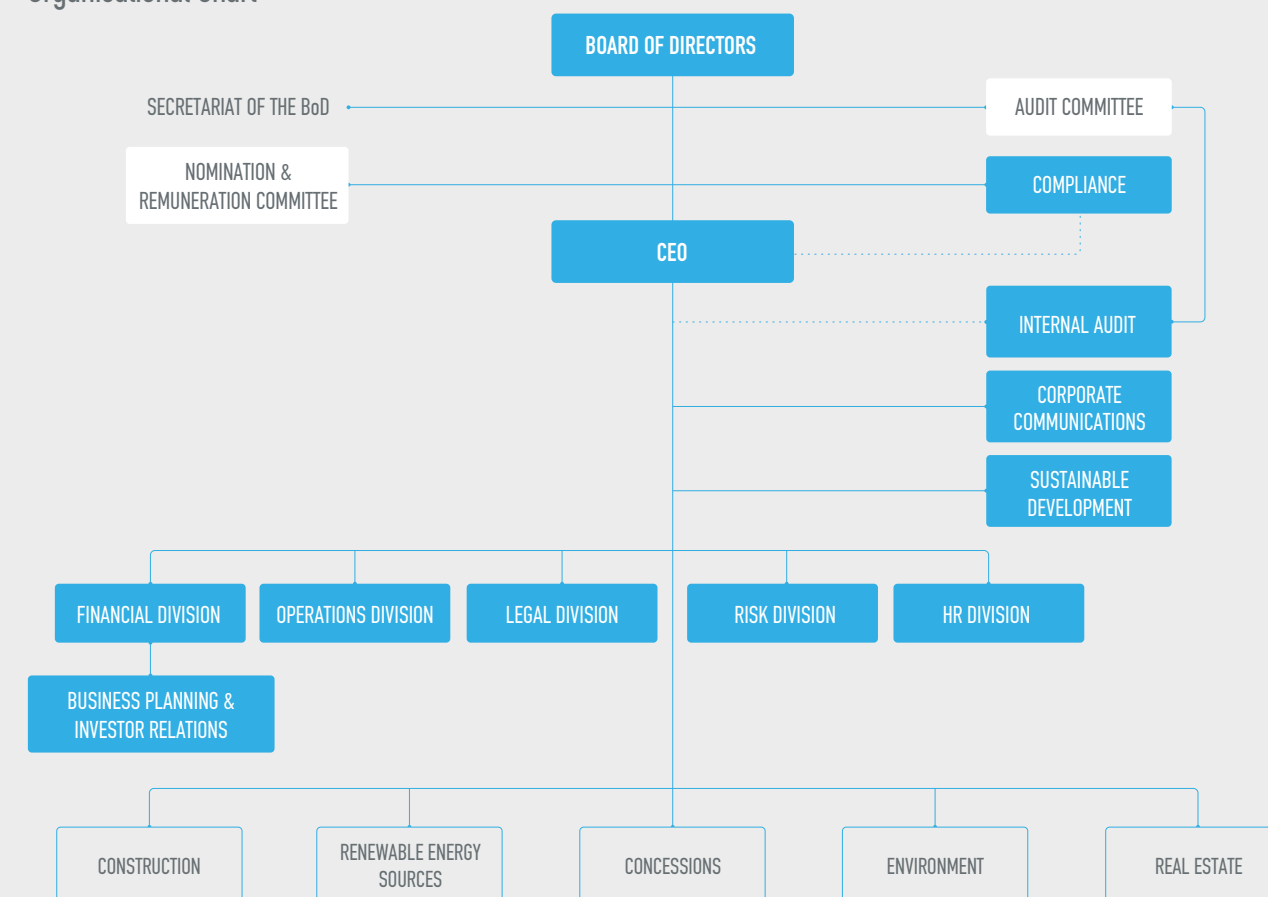
2.1 CORPORATE GOVERNANCE

The demanding and constantly changing environment in which ELLAKTOR Group operates, dictates an effective Corporate Governance framework, which will respond to the challenges of the times and adapt to the business, economic and social conditions, by recognising risks and opportunities. The sound system of principles that forms the foundation for the way ELLAKTOR Group is organised, managed and operates, seeks not only the realisation of strategic objectives, but also the protection of the Group's internal unity. Moreover, this also safeguards its integrity and reliability, while strengthening its competitiveness by adopting agile structures and ground-breaking approaches.

Organisational Structure

ELLAKTOR Group's operation is based on a modern and effective model geared towards sustainable and responsible development. The Group applies corporate governance practices in relation to the size, composition, tasks and the overall operation of its Board of Directors (BoD) and committees. Given the nature and purpose of the Company, the complexity of its affairs and the multitude of its subsidiaries and joint ventures in Greece and abroad, the Group's Board of Directors has established committees, composed of its members, with supervisory, authorisation, coordination and advisory competences, comprised of its members, in order to assist the Group Management in performing its functions. The organisational chart depicts all Committees, which report directly to the BoD, as well as ELLAKTOR Group's main organisational structure.

Organisational Chart



Executive Body or position

BoD or Management Committee

Segment

Corporate Governance Code

The **Corporate Governance Code** was prepared by the Group's parent company, ELLAKTOR S.A., pursuant to Law 3873/2010 and includes the corporate governance principles that govern the Group's management and control.

The Group's Code is based on the Corporate Governance Code of the Hellenic Federation of Enterprises (SEV) (January 2011) and, by extension, on the Organisation for Economic Co-operation and Development (OECD) Principles of Corporate Governance, and the "Principles of Corporate Governance in Greece - Recommendations for its Competitive Transformation" of the Hellenic Capital Market Commission. The Code also includes the mandatory rules that have been ratified by laws or regulations of competent bodies such as the Hellenic Capital Market Commission.

The Corporate Governance Code guarantees the duration and effectiveness of the Group's operation, securing the interests of all stakeholders and observing the principles of transparency, professional ethics and responsible management of all resources.

The ELLAKTOR Corporate Governance Code is structured as follows: **a)** the General Principles which constitute the general corporate governance framework and summarise the guidelines, and **b)** the special Practices, into which General Principles are qualified, as "compliance or explanation" provisions, which form the basis of the ELLAKTOR S.A. corporate governance statement.

Board of Directors

The **Board of Directors** is responsible for setting the Corporate Strategy and the Group's growth policy, and bears the overall responsibility for managing the company's risks, including those relating to the credibility of financial statements. Being the Company's supreme administrative body, it shapes the company's strategy, controls the management of its assets and manages its corporate affairs for the benefit of the company and all shareholders, ensuring that Management follows the corporate strategy.

At the end of 2020 (31.12.2020), the ELLAKTOR Board of Directors consisted of nine (9) members, all of who were Greek nationals, seven (7) were men and two (2) women, two (2) were between 30-50 years old and seven (7) above 50 years old.

It is noted that on the publication date of this Report, in June 2021, the new Board of Directors of the Company, as elected on 27.01.2021 by the Extraordinary General Meeting of its shareholders, (after the postponed Extraordinary General Meeting of 07.01.2021) and after its reconstruction in a body on 21.05.2021, is as follows:

1. Georgios Mylonogiannis, Chairman of the Board of Directors, Non-Executive Member
2. Aristides (Aris) Xenofos, Vice President of the Board, Non-Executive Member
3. Euthymios Mpouloutas, CEO, Executive Member
4. Konstantinos Toumpouros, BoD Member, Independent - Non-Executive Member
5. Athina Chadjipetrou, BoD Member, Independent Non-Executive Member

More information regarding corporate governance, the Committees, as well as any important developments and policies (e.g. **ELLAKTOR Board Remuneration Policy**) is provided in the subsection "Corporate Governance" of the Group's **website** and in the **Annual Financial Report 2020**.

2.2 COMPLIANCE

The Group intends to carry out its activities honestly, ethically, with integrity and in line with the applicable laws, regulations and standards, its policies and guidelines, and its Code of Conduct.

The Group is implementing an Ethics and Regulatory Compliance Programme designed to prevent, identify and address issues of ethics and regulatory compliance. The Programme is currently being updated. The Code and the Programme have been communicated to Group employees.

Aiming to enhance its integrity, transparency and zero tolerance on corruption issues, the Group and its subsidiaries, adopted in early 2020 the Anti-Bribery and Whistleblowing Policies.

In 2020, there were no cases that reached the courtrooms in relation to corruption and anti-competitive behaviour against the Group or its employees.

On 15.06.2016, charges were filed against HELECTOR CYPRUS LTD (a wholly-owned subsidiary of HELECTOR) in relation to alleged illegal practices of former executives of the company in the context of its activity in the Republic of Cyprus during the period 2010 - 2014. By virtue of the interim unanimous decision of the Permanent Assize Court of Nicosia dated 18.03.2019, HELECTOR CYPRUS LTD was acquitted on charges relating to the award of the contract for waste management plant in Larnaca, whilst the decision of the Assize Court of Nicosia of 07.02.2020 later found HELECTOR CYPRUS guilty on other charges filed against it. By its decision of 11.03.2020, the court imposed a pecuniary penalty amounting to € 183,000. HELECTOR CYPRUS has subsequently exercised its legal right to appeal under petition No 34/2020 against the aforementioned conviction, and the issuance of the relevant decision is pending.

In 2020, the Group's Compliance system was acknowledged by an independent body to follow the guiding principles of ISO 19600:2014. This validation reaffirms that the Group, in its daily operation, complies with the legislation, as well as with the Code of Ethics and its internal Policies.

In addition, the Anti-Bribery Management System of ELLAKTOR and AKTOR CONCESSIONS was certified in 2020 by an independent body according to ISO 37001:2016. It should also be mentioned that HELECTOR, implements an Anti-bribery Management System in accordance with the ISO 37001:2016 standard, which has been certified since 2017.

Code of Conduct

The **Code of Conduct** contains the fundamental principles, the rules and the values that shape the context of the Group's activities and determine the everyday behaviour and practices of all employees, covering issues related to corruption, inappropriate behaviour, gender equality and the promotion of all employees well-being, regardless of their position and rank. The purpose of the Code is to provide guidance to employees on proper conduct and on how to address issues related to business ethics principles and rules.

This set of principles and rules extends to all Group companies and the way which they conduct their business with customers, subcontractors, suppliers and partners. All business units of the Group must abide by and protect the principles and values set out in the Code of Conduct.

The Code is currently being updated.

Anti-Bribery Policy

In January 2020, the Group's Board of Directors approved the **Anti-Bribery Policy**, which seeks to strengthen the Group Management's commitment towards zero tolerance against bribery, creating a framework of obligations and guidelines, to be used as a tool for preventing, deterring and combating bribery.

The Policy applies to all Group Companies and is binding on (i) the members of the Board of Directors and persons carrying out managerial duties throughout Group companies, (ii) Group personnel, (iii) customers, suppliers/sub-contractors and persons providing services to Group companies and (iv) any third party acting on behalf of the Group.

Whistleblowing Policy

In January 2020, the Group's Board of Directors approved the **Whistleblowing Policy**, which sets out the principles and framework under which the Group accepts, processes and investigates any allegations (submitted anonymously or by name) of irregularities, omissions or other criminal acts that have come to the attention of the staff, customers, suppliers or other third parties. The Policy applies to all Group companies.

Complaints may: **(a)** Be reported directly to the Group Head of Compliance or to the Compliance Officer of one of the Group's companies, or **(b)** be sent to the email address compliance@ellaktor.com, or **(c)** be submitted via the anonymous complaints application (platform), which can be accessed at <https://integrity.ellaktor.com>, or **(d)** be sent by post to the address: ELLAKTOR S.A., 25, Ermou Street, 145 64 Kifissia, to the attention of the Compliance Department of the Company, or to the postal address of another Group company, to the attention of the respective company's Compliance Department, and should be marked "Confidential", or **(e)** be submitted in printed format directly to the Company's Compliance Department or one of the other compliance departments of the Group.

In 2020, 11 complaint reports were submitted by employees, and 1 by suppliers, partners, and subcontractors of the Group, through the online complaints platform and the email address: compliance@ellaktor.com.

The above mentioned reports mainly concerned matters of health, data protection and misconduct. Eight (8) of these reports were anonymous, while in 1 case the complainant's personal information was not accurate.

In 8 cases, it was not possible to further investigate the reports due to lack of sufficient data, whilst in 1 case the complaint was withdrawn. Of the 3 reports that could be investigated, 1 was closed without further action as no infringement was confirmed and 2 closed after appropriate action was taken.

In 2020, no confirmed incidents of corruption were recorded and the Group did not terminate any contract between employees or associates due to corruption issues.

Training

Group employees regularly attend educational and informative seminars on regulatory compliance issues.

In 2020, 29 Group executives attended training on the Group's Anti-Bribery Policy. Additionally, the Regulatory Compliance Officers of the Group's segments, as well as Legal and IT Division executives (total 7 employees) were trained on the use of the complaints platform.

Furthermore, one (1) Group Regulatory Compliance executive attended training on anti-fraud issues by ACFE (Association of Certified Fraud Examiners) and following the completion of related examinations was certified as a Certified Fraud Examiner (CFE).

Finally, in November 2020, the Group's Compliance Officers and the certified Auditors (CFE's), attended ACFE Greece's annual conference "Virtual AntiFraud Tech Fair", which took place as part of the International Fraud Awareness Week.

Data Privacy

The Group's approach to processing and assuring personal data is in line with the requirements of the EU's General Data Protection Regulation (GDPR) 2016/679.

In 2020, Data Protection Impact Assessments (DPIA) were completed, where applicable. Furthermore, the policies and procedures, focusing on enriching and strengthening the data protection framework in accordance with the GDPR and developments of the National Legislation, were reviewed and revised, where necessary. In particular, the following were readjusted:

- The procedures related to the management of the COVID-19 pandemic (monitoring the employees and individuals entering the Group's facilities, temperature measurement, recording of health data, symptoms, travel abroad, contacts with institutions, etc.).
- The procedures and text information regarding the use of cookies on the Group companies' websites, in compliance with the relevant guidelines of the Hellenic Data Protection Authority (HDDPA) of February 2020.

The Processing Activities File and the Data Protection Policy contain all the principles that establish procedures for the processing of any personal data by the Group, the relevant obligations, data privacy rights, as well as the required security measures. The Data Subjects' Rights Procedure and the Data Retention and Destruction Procedure have been included in the Data Protection Policy's appendix.

In addition to actions related to the compliance of GDPR, any relevant data protection issues that took place during operations of the Group were resolved. In addition, some inquiries were completed against ATTIKI ODOS and ATTIKES DIADROMES, which mainly concern objections towards users' registration process (the legality of the procedure was explained and it is made available to the applicants in advance), requests for access to personal data (the requests are fulfilled depending on whether the legal requirements are met) and a request to delete a subscriber's data following the termination of their account. In the latter case, the applicant was informed of the applicable policy, according to which, after the deletion of a user's account, certain data is kept pseudonymised for reporting reasons to the supervisory authority. The above is in compliance with the obligations as set out in the concession contract, is under the consensus of the supervisory authority and is upon informing the HDDPA. All requests were processed within the legal deadline and there were no requests for further settlement by the applicants.

In 2020, the Group received 7 requests for personal data management issues, none of which were sent by any regulatory authority. There was no incident of personal data leakages from the Group's customers or non-compliance with the General Regulation for Data Protection.

2.3 RISK MANAGEMENT AND BUSINESS CONTINUITY

The Company's Board of Directors places particular emphasis on internal audit and risk management systems for which it is responsible, aiming to adopt and operate systems and processes for optimal risk management.

Risk management is an integrated and continuous process intended to ensure the effective management of Company risks, including strategic, financial and operating risks, as well as those relating to compliance and to the Group's reputation, aiming to minimise unexpected derogations from Company goals and increase the Company's true value. The Risk Management Division allocates the relevant activities and responsibilities (detection, assessment, management and monitoring) at all business levels, depending on the type and scheduling of risks, also activating a process for continuous and direct monitoring of significant business risk factors that may adversely affect the Group's objectives.

The overall risk management system enables the Board of Directors and the Management to make better informed risk/recovery decisions, in response to the fundamental governance and policy requirements. All significant decisions relating to strategy, financing, investment and participation in projects are assessed explicitly and independently by the Risk Management Division.

The international activities of the Group are affected by multiple risks, which the Company monitors and manages through the risk management framework. The purpose of the risk management framework is to reduce uncertainty in the achievement of the Company's strategy, limit the impact of risks on the objectives and maximise the benefit of the opportunities presented.

The Group has in place and regularly reviews a risk management framework system intended to cover operating risks, such as the preparation of financial statements. The Risk Management Division set up by the Group in 2019 aims to provide reasonable assurance that the Group's strategic objectives are attained and that decisions are made within the risk assumption limits. The Risk Management Framework, which is based on best international practices and tailored to the needs of the Company, promotes a single culture that integrates risk management into processes, activities and decision-making at all levels of the organisation.

The Management is responsible for the implementation of the Risk Management Framework in the daily life of the entity. In particular, the Management is responsible for the systematic identification and assessment of risks that affect business activities and in addition, oversees the formulation and timely implementation of risk management plans. It regularly evaluates the effectiveness and the need to adjust risk management plans to achieve optimal management.

The Risk Management Division regularly assesses the Group's internal audit system in order to detect any weaknesses and take corrective measures. The internal audit system is monitored by the Audit Committee, which in turn reports directly to the Board of Directors.

The Board of Directors is responsible for the overall effective management of risks, including those relating to the reliability of financial statements.

Certified Management Systems

In order to ensure transparency in all its activities and greater efficiency of its business operations, the Group has developed procedures and management systems, which are certified according to international management standards. Apart from guaranteeing compliance with the applicable legislation, this ensures constant improvement and greater reliability of the Group, also providing multiple benefits related to safe working conditions, protection of the environment and enhanced productivity and sustainability.

The Group's companies have developed management systems and received certifications in accordance with the following standards:

- **ISO 9001** - Quality Management System
- **OHSAS 18001** and **ISO 45001** - Occupational Health and Safety Management System
- **ISO 14001** and **EMAS** - Environmental Management System
- **ISO 50001** - Energy Management System
- **ISO 39001** - Road Traffic Management System

- **ISO 37001** - Anti-Bribery Management System
- **ISO 27001** - Information Security Management System
- **ISO 22301** - Business Continuity Management System

Moreover in 2020, the Group was audited for all its activities regarding the application of the guiding principles of the **ISO 19600** standard on Compliance Management, and HELECTOR company was respectively audited regarding the application of the guiding principles of the **ISO 26000** standard on Corporate Social Responsibility management.

In the past, any precautionary measures that were implemented, mainly concerned the prevention of occupational hazards and the environmental impacts under the OHSAS 18001 and ISO 14001 standards respectively. With regard to the Quality Management Systems, individual precautionary measures were implemented by the Quality Manager, mainly for management issues of the system.

In accordance to the revised ISO 9001:2015 standard, the requirement for “precautionary measures”, included in older versions, has been replaced by a risk-based thinking approach. This approach stipulates that organisations should identify possible threats and opportunities that relate to their activities and take them into account when designing their Quality Management System.

In 2020, the Quality Management Systems of all individual companies were revised, in accordance to the requirements of the new version of the ISO 9001:2015 standard. The identified threats are now categorised by their respective risks depending on the severity inflicted on the companies’ services/projects (Low, Medium, High, etc.). Occasionally, threat management procedures are developed according to the specific project/customer requirements. During annual administrative reviews of the Quality Management Systems (at project and company level), threats (if any have occurred) and determined precautionary measures are reviewed together with mitigation actions.

List of Certified Management Systems

COMPANY	ISO 9001:2015	OHSAS 18001:2007 (ISO 45001:2018)	ISO 14001:2015	ISO 50001:2018	EMAS III	ISO 39001:2012	ISO 37001:2016	ISO 27001:2013	ISO 22301:2019
ELLAKTOR Group (ELLAKTOR S.A.)							●		
CONCESSIONS									
AKTOR CONCESSIONS SINGLE MEMBER S.A.	●		●			●	●		
ATTIKES DIADROMES S.A.	●	●	●	●		●			
ATTIKI ODOS S.A.		●	●	●					
MOREAS S.A.	●		●	●					
ENVIRONMENT									
HELECTOR S.A.	●	●	●	●		●	●	●	●
STERILISATION S.A.	●	●	●						
APOTEFROTIRAS S.A.	●	●	●						
ASA S.A.	●	●	●						
EDADYM SINGLE MEMBER S.A.	●	●	●						
HELECTOR S.A. – ARSI S.A. JOINT VENTURE	●	●	●						
CONSTRUCTION									
AKTOR S.A.	●	●	●	●	●				
AKTOR FM SINGLE MEMBER S.A.	●	●	●	●		●		●	
HELLENIC QUARRIES S.A.	●								
GREEK NURSERIES S.A.	●								
TOMI S.A.	●	●	●	●		●			
REAL ESTATE DEVELOPMENT									
YIALOU COMMERCIAL & TOURIST S.A. (Smart Park)	●		●						

Business Continuity

In 2020, the COVID-19 pandemic created new norms for the protection of employees' health and safety. The Group took all necessary actions, in order to ensure its uninterrupted operation while safeguarding the safety of the employees, as well as the customers and service users.

Due to the outbreak of COVID-19 in the beginning of 2020, the Group accelerated the planning for the implementation of remote working for its employees, in order to ensure that they can continue to work safely. The Group managed, in a very short timeframe, to provide its employees', who worked remotely, with all appropriate equipment and respective training, as well as to develop the necessary infrastructure to support remote working with safety. The remote working structure was embraced by all employees, thus ensuring the Group's business continuity at a very high level.

Specific emphasis was placed on employees' continuous training regarding the implementation of hygiene rules, as well as the provision of all necessary personal protection means, such as gloves, masks and antiseptic solutions. At the same time, all available internal communication channels were used (email, teleconferences, posters, notification posts on the Group's intranet), in order to ensure that all employees are alert and that they strictly comply with the hygiene rules.

In order to ensure employees' health and safety in the workplace, the Group proceeded with the implementation of specialised technical interventions and reorganisations, where possible. More specifically, protective plexiglass barriers were installed, air-conditioning units were fully upgraded, and UV filters were placed, while the necessary organisational measures were taken to maintain safe distancing between employees. At the same time, PCR and rapid tests were regularly conducted to employees nationwide as well as to the Group's subcontractors' and business partners' employees, where necessary. Also, regular preventive disinfections were carried out in all of the Group's facilities.

In this context, a new process for collecting and recording employee data on COVID-19 was designed and implemented. All relevant information (such as the employees' laboratory tests to detect SARS-CoV-2, the diagnostic control centre, the type of test, the result, etc.) are recorded in a summary table, while at the same time, close contacts of employees are monitored and all the necessary protection measures are taken in accordance with current legislation.

Furthermore, an action plan on the mitigation of the pandemic contagion was designed and communicated throughout the Group's projects/facilities taking into account scenarios such as: dealing with positive cases of SARS-CoV-2 and close contacts (positive cases) according to the instructions of the Occupational Physician and the protocol of the National Public Health Organisation.

All Group's projects/facilities are regularly informed by the Health and Safety Departments and necessary actions are taken regarding the updated legislation for the protection of employees against the spread of COVID-19.

Ensuring the operation of highways during the pandemic

According to the framework for COVID-19 pandemic management, the State imposed traveling restrictions that resulted in a significant reduction in traffic on both the Attiki Odos and the Moreas highway. Transits on Attiki Odos decreased by 24% in 2020 compared to 2019, for the whole year, while for the first period of lockdown imposed (23.03.2020 – 03.05.2020), the reduction of traffic reached 73% compared to the corresponding period of the previous year. Respectively, the crossings on the Moreas highway, in 2020, decreased by 23% compared to 2019, while in the period of the first lockdown the reduction of traffic reached 82%. Throughout this period, the priority has been to ensure the health and safety of staff and users and to ensure business continuity. ATTIKES DIADROMES and MOREAS have implemented operational plans and precautionary measures to deal with the pandemic, which are updated whenever necessary and adapted to accommodate new data and changes in the relevant legal framework.

ATTIKES DIADROMES: COVID-19 Emergency Response Plan



CASE STUDY

A COVID-19 Pandemic Emergency Response Plan has been developed, which includes an operational plan and precautionary pandemic measures.

a. Operational plan

- Establishment of a backup Traffic Management Centre (TMC), which can cover the basic functions of the main TMC, in case it needs to be closed for any reason and period of time.
- Creation of an additional Customer Service Call Centre at the Mediterranean Subscriber Service Facility, which operates alongside the existing one located at the company's headquarters, with complete separation between the employees working in the two Call Centres.
- Operational disruptions of the Subscriber Service Stations during the period when traffic restrictions were imposed for citizens (lockdown). Subscriber registrations and electronic toll devices are serviced via telephone and contract renewals and electronic toll devices (e-Passes) are sent through courier companies, while users are requested to monetarily recharge the electronic toll devices electronically and not in cash.
- Informing and encouraging drivers, who do not have an electronic toll device and are served by a collector, to pay electronically or by card, through the Access point Variable Message Signs (AVMS) at all entrances of the toll stations.
- Tele-working program through remote access from home with the provision of laptops, as well as a mandatory time-off program, to ensure the reduction of employee presence at office. These programs last one week (depending on the Management) and are constantly updated.
- Issuance of special-purpose leave to applicable employees. Also, provision of time-off work to employees who belong to vulnerable groups as well as pregnant women, in order to protect their health.

- Suspension of employees (Government program).
- About 50% of the staff is available and working as normal.
- Postponement of upgrades and replacements, as well as maintenance works that require lane closure and construction machinery during the first lockdown.
- Use of electronic and telephone systems for teleconferences, available to all executives, as well as the capability for bulk SMS communication to all staff, in order to provide information in case of emergency about a confirmed COVID-19 case at work, or other business emergencies.
- Daily teleconference among Chief Executive Officer and all the Directors and Heads of Independent Departments, including the Occupational Physician, to inform everyone and to formulate the company's strategy.
- Systematic teleconferences among all Divisions to coordinate actions.
- Continuous information and coordination with the relevant Ministry and Egnatia Odos.

b. Precautionary measures

- Daily communication of the Management with the Occupational Physician and the nursing staff of the Medical Office on preventive guidelines for COVID-19 management.
- Availability of personal protective equipment for staff in all workplaces, in accordance with the instructions of the Authorities.
- Disinfection and enhancement of cleaning services.
- Prohibition of business trips.
- Restriction of third party visits to the company's premises.

Information systems

The Group develops and maintains Business Continuity Plans, in order to ensure the uninterrupted operation of all its important information systems and, by extension, the important continuation of operations following a disaster. Business Continuity Plans are approved by the Management and are regularly evaluated, in order to appropriately reflect the Group's operational reputation, both at a technical and organisational level. The methodology used to develop and implement business continuity is based on the following principles:

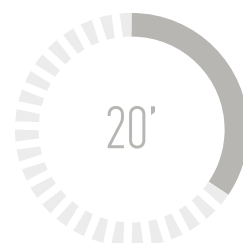
- the development of the business continuity strategy must comply with the Group's targets and priorities,
- the Group's important operations are established and categorised with respect to the prioritisation of the Group's business activities,
- the information resources that support the critical operations of the Group, are recognised and the maximum recovery time is determined, as well as the required technical procedures (Disaster Recovery Plan),
- the risks encountered by the above information resources, as well as the business implications of relevant threats, are recognised and used in the development of the Business Continuity Plans.

Emergency Response

In case of emergencies, the competent Group Divisions coordinate their actions accordingly with the executives of the subsidiaries. In addition, the Group companies may have their own procedures and plans, depending on their activities and responsibility.

The responsibilities of ATTIKI ODOS and MOREAS, in relation to risk management and emergency responses, constitute conventional issues, which are included in the Project Concession Agreements, as well as in the Operation and Maintenance Manuals, approved by the Greek public sector. Meanwhile, both companies have drafted Action Plans, which are included in their Operation Manuals and describe the methods for dealing with different types of emergencies and situations. In addition, Evacuation Plans are in place and evacuation drills are carried out on an annual basis requiring employee participation. In 2020, ATTIKES DIADROMES carried out an evacuation drill with the participation of 15 employees.

Conventional
response time
to incidents

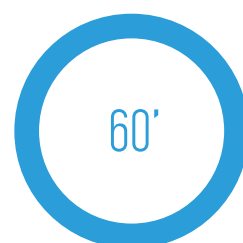


20'

Actual response
time to incidents
(average 2020)



5.8'



60'



14.5'

■ ATTIKI ODOS and ATTIKES DIADROMES

■ MOREAS

In order to control traffic and handle incidents on the Attiki Odos and Moreas motorways, collaborations have been established with all competent bodies (Hellenic Police, Fire service, Emergency Aid Centre, General Secretariat for Civil Protection etc.), as well as with the State Agencies that oversee the project, the Region and the Municipalities where the motorways pass through. Large scale drills take place in the motorway's tunnels, where response times and the efficiency of the involved bodies is examined. Also, any possible problems are recorded, and corrective actions are proposed.

The main premises of ATTIKI ODOS and ATTIKES DIADROMES at Paiania and of MOREAS at Nestani (Arcadia), have been verified as Independent Civil Defence Institutions by the Ministry of Interior.



2.4 SUPPLY CHAIN

The Group, in cooperation with its suppliers, aims to fully meet the needs of its projects and operations and to achieve the highest quality of its final projects, products and services. At the same time, the Group focuses on supporting local suppliers where possible, thus strengthening the local economy. In 2020, the Group's companies acquired 95% of their supplies from local suppliers.

Supply Management

According to the existing procedures and practices, in regard to supply management, procurements are carried out individually per company and/or project, based on pre-determined specifications and market research and on the accessibility of local suppliers. For procurements above € 100,000, the supplier must be approved according to the Group's regulatory compliance criteria.

Depending on the activities of the Group, some procurements may be subject to the specific terms that are outlined in the signed contractual agreements. For ATTIKI ODOS and ATTIKES DIADROMES, the motorway's "Operation and Maintenance Contract" is an attachment to the "Concession Agreement" with the Greek State. The specifications of the materials predominantly used in the motorway's operation and maintenance are outlined in the concession contract. Hence, the selection of materials and products used for the project is pre-determined and carried out according to these criteria. Suppliers/subcontractors are similarly selected through open market research, with request for product specifications and proposals of at least 3 different suppliers/subcontractors. From the offers received, the final selection takes into account the quality of the proposal and the cost of the services, as well as the delivery/response time.

The companies of the Group may use various suppliers depending on their differing activities. Indicatively, the Construction segment mainly collaborate with technical companies, suppliers of concrete reinforcement materials, subcontractors specialising in earthworks, electromechanical projects – installations, metal constructions, reinforced concrete, fuels, cement products, lifts, aluminium constructions, etc. Respectively, the companies in the Concession segment collaborate, mainly, with maintenance contractors, software and maintenance companies for Toll and Traffic systems, companies specialising in remittance, security and statement printing and mailing services, as well as suppliers of electrical materials and road safety equipment, etc.

Optimisation of Supply Management

The Procurement Division has been created and operated with the aim of centrally managing purchasing at Group level. The Procurement Division cooperates with the other Divisions of the Group as well as with the Procurement Departments of the companies and projects, in order to monitor and serve their needs. The Division is responsible for purchases that comprise of more than one company/joint venture and/or project of the Group, seeking to reduce costs, based on the economies of scale. In addition, it monitors materials market trends and advises the companies accordingly. The Group's Procurement Policy, which describes the new systemic flow of supplies was approved in 2020 and the system implementation and operation, in the Group (ERP) system, is expected to be completed in the second quarter of 2021.

Moreover, in 2020, ELLAKTOR Group proceeded with the following:

- Development and confirmation of a systemic implementation of approval flows "Purchase Requests – Request for Proposal – Controlled Purchase Protocol (CPP), CPP Approval – Order" and implementation of universal records of purchase approvals of materials and services in the Group's ERP system.
- Integrated the above mentioned procedures and approval flows in the Group's ERP system with the cooperation of the Group IT and Procurement Divisions and an external consultant (in progress).
- Developed an Inventory Control and Coding of Materials and Services Department within the Group Procurement Division (in progress).

Promoting Responsible Business Practices to Partners of the Group

The Group urges its suppliers and partners to act responsibly, and requests that they comply with its Code of Conduct. In 2020, there were no incidents or issues regarding human rights violations by the approved suppliers working with the Group.

ATTIKI ODOS and ATTIKES DIADROMES have developed a Supplier Code of Conduct, which outlines extensively the ethical principles and values that their partners/suppliers must adhere to. The Code sets out the basic requirements that the companies expect to be met by their suppliers of materials/equipment and services, as well as by their subcontractors, regarding responsible conduct in the performance of their contractual obligations with respect to the counterpart, the society and the environment.

Since 2018, HELECTOR, has been carrying out due diligence procedures for its partners through the completion of

relevant surveys and by informing them on the respective regulatory compliance documents of the Group and the company, within the framework of the company's ISO 37001:2016 Anti-Corruption Management System and its Anti-Bribery Policy. At the same time, the partners (suppliers, subcontractors, etc.) with financial contracts valued over € 60,000 declare, either with a separate document, or with a specific term within the existing contract, that they have received these documents as posted on the Group's website and are bound to refrain from any action that constitutes a breach of the principles disclosed. Any potential breach gives the company the right to terminate the contract.



03 INNOVATION AND DIGITAL TRANSFORMATION



Participation in 9 research projects



Offering of innovative solutions and services



Continuance of the Group's Digital Transformation

9 INDUSTRY, INNOVATION
AND INFRASTRUCTURE



3.1 INNOVATION

ELLAKTOR Group is being redefined into a modern Group, diversifying its activities and redesigning its operations, as led by the transition into the new digital age. At the same time, it is exploring possibilities of more efficient technology use in the Group's activities.

Research Projects

Aiming to identify innovative solutions that will contribute to the optimisation of the way in which the companies of the Group operate, but also to the development of new products and services, the companies participate in a series of research projects.

The Concessions segment participates in 5 research projects through the companies ATTIKES DIADROMES and MOREAS. Since 2017, the company ATTIKES DIADROMES participated in the research project SAFE STRIP, which is part of the Horizon 2020 framework program. The project is targeted towards technology creation, more specifically, it aims to embed C-ITS applications into existing road infrastructure, including innovative I2V (Infrastructure to Vehicle), V2I (Vehicle to Infrastructure), and VMS (Variable Message Signs) / VSL (Speed Limit Signs) functions into low-cost, integrated strip markers on the road, for trucks, cars and vulnerable road users, for all vehicle generations (non-equipped, C-ITS equipped, autonomous). The project was successfully completed in 2020, contributing to the abridgment of the research gap on issues of increased safety in vehicles, and in road infrastructure. Through the use of technology, drivers were informed in real-time about traffic safety through messages broadcasted on electronic road signs. The findings of the project showed that SAFE STRIP supports the capability to introduce autonomous vehicles to infrastructure and roads, to determine the appropriate technology to be used in achieving its goals and to be implemented within infrastructure. Although there are still some challenges that need to be addressed (regarding existing transport infrastructure, standardisation, policy, and regulatory aspects), SAFE STRIP has the ability to make

a difference in the transportation sector. It is noted that the project was selected to be presented in the H2020 Road Transport Research European Conference, which brings together leading-edge projects from road transport research, discussing their results and reflecting on the future of the industries covered by their research.

In addition, since September 2018, the company ATTIKES DIADROMES participates in two additional research projects under the "RESEARCH – CREATE – INNOVATE" initiative, the MANTIS project and ODOS 2020, co-financed by European Union and Greek national funds through the Operational Program "Competitiveness, Entrepreneurship and Innovation" (EPAnEK).

MANTIS (Multiservice Capable Intelligent Transportation Systems) is a three-year research project, aimed at designing a comprehensive framework for the development of heterogeneous applications in intelligent transport systems and at implementing and demonstrating driver assistance systems towards improvement of road transport. In recent years, all vehicles are equipped with a variety of sensory instruments, providing this collected data through processing units and customised interfaces. MANTIS develops innovative applications based on the communication between vehicles and external Internet applications, with a view to enable transport infrastructure and fleet management centres to monitor and track environmental conditions or extraordinary events.

The project "ODOS 2020" aims to introduce a disruptive technological solution that will achieve to implement cooperative Intelligent Transport Services (ITS) applications, deploying Internet of Things (IoT) and Infrastructure to Vehicle (I2V) technologies, without requiring costly interventions in the infrastructure and contributing to the increase of road safety and regular maintenance of the infrastructure. The integrated technological solution is applicable to all types of vehicles and will require zero to minimum vehicle equipment. The proposed solution is based on low-cost, sensory networks, embedded in strips markers on the road.

Finally, since 2019, ATTIKES DIADROMES participates in the European research project C-ROADS. The project is part of Investment Priority 3: "Intelligent Transport Services for road (ITS)" and more specifically, objective 10: "Cooperative, connected and automated mobility - cooperative ITS and automation". The objective of the C-ROADS project is the research, development and pilot implementation of Cooperative Intelligent Transmission systems (C-ITS) in various parts of the country's main roadways and the harmonisation of the corresponding pilot tests performed in other Member States through the C-ROADS Platform. In addition, the project aims to ensure its interoperability while contributing to the creation of a sustainable transportation system and to the improvement of road safety through the more efficient use of infrastructure in both road and freight transport.

The RES segment participates in two research projects. The first is the "ENAUSSI" project, which seeks to design an energy-efficient Construction Response Data Logging and Transmission System, which will include piezoelectric sensors. The ENAUSSI wind turbine project has been included in the State Aid for Research, Technological Development and Innovation "RESEARCH – CREATE – INNOVATE" through the operational program "Competitiveness, Entrepreneurship and Innovation" Partnership Agreement for the Development Framework (PA) 2014-2020. The main goals of the project are the achievement of energy autonomy, the storage and transmission of information on fatigue of the blade and the optimisation of its position on the flap. An additional objective is the expansion of the system, with minor modifications, to a wide range of structures.

In addition, the RES segment participates in the European Commission project, "An Integrated Platform for increased Flexibility in smart Transmission grids with Storage Entities and large penetration of renewable energy sources". Its main objective is the creation of a multi-tool energy platform that aims to control the stability of the electricity transmission system using data from "state-of-the-art real-time" sensors, through the integration of storage systems using batteries. The main partner of the project is the Spanish company, JEMA ENERGY S.A.

The Environment segment participates in two research projects which are included in the EPAnEK "RESEARCH – CREATE – INNOVATE" program. The research project "Hybrid model of landfill leachate treatment combining the

use of Advanced Oxidative Anti-Pollution Processes and membrane technology", with the acronym "UV-LEACH", started in 2020 and is implemented in collaboration with the Aristotle University of Thessaloniki. The treatment of waste with high pollution concentration, such as landfills, is one of the most important challenges nowadays. The objective of the project is to maximise the reduction of pollution from treated effluents, through innovative anti-pollution technologies, taking into account the investment as well as the operating costs, but also the operating costs, aiming to minimise the environmental footprint of treated landfill effluents.

The research project "Development of an Integrated Methodology for the Removal of Micro-Pollutants in Liquid Waste and High Pollutant Drainage Combining Adsorption, Advanced Oxidation Processes and Membrane Technology", with the acronym "PROMoTE 2020", started in 2020 in collaboration with the University of Thessaloniki. The project consists of a new model for landfill leachate treatment, based on zero-cost raw material, deriving from agri-food and other residues, which contributes to the cyclical economy by reusing waste and residue within a life cycle.

Innovative Solutions and Services

Since November 2020, Attiki Odos subscribers who use the e-PASS device to pay the tolls on Attiki Odos, can make universal use of e-PASS on all highways in Greece: "Olympia Odos", "Moreas", "Aegean", "Nea Odos", "Kentriki Odos", "Egnatia Odos" and the Rio-Antirrio Bridge "Charilaos Trikoupi", within the service of GRITS (Greek Interoperable Tolling Systems). The full interoperability among the ETC systems of the highways, facilitates the migration of users and the provision of a high level of services, while helping to increase the use of electronic toll transponders nationwide (especially in conjunction with the effort for contactless transactions, etc., due to the pandemic).

Furthermore, since November 2020, all holders of electronic toll transponders issued in Greece, can use the electronic lanes at all Toll Stations of the Moreas highway, under GRITS (Greek Interoperable Tolling Systems).

In order to more effectively monitor maintenance contracts (preventive and invasive work), AKTOR FM has proceeded with the installation of special CMMS software (COSWIN 7i).

At the same time, it has installed the POWERFLEET system for monitoring the position, course, and speed of the company vehicles fleet, enabling the monitoring of movement and exceedances of the speed limit.

It should be noted that AKTOR FM has started a cooperation with a company that specialises in charging stations for electric vehicles. Through this cooperation, the Group has proceeded with the installation of 8 new electric vehicle chargers for private customers.



3.2 DIGITAL TRANSFORMATION

The Group emphasises on its digital transformation, in order to improve its operation. The digital transformation covers the following areas:



Mobile telephony services



Cloud technologies



Data analysis



Internet of Things



Robotics and automation



Artificial Intelligence



Cybersecurity

ELLAKTOR Group aims to fully utilise the opportunities offered by the digital transformation and acquire relevant knowledge and skills at all levels, in order to develop a working environment that is acclimated to the present digital reality and the opportunities that it offers.

The Group's digital transformation is a continuous effort, which predominantly embraces the concept of change, not just in terms of technology, but in the way it works.

Already, technology is widely used in different segments and activities of the Group. Some examples include:

- The use of the Building Information Modelling (BIM) in matters of architecture and construction, which creates significant benefits through the life cycle of a building.
- The use of modern IT service methods, such as Infrastructure as a Service (IAS), PaaS (Platform as a Service) and SaaS (Software as a Service), which offers a cost-effective, safe, and flexible digital resource service (data processing and storage), specifically for construction companies, that adjust their resources depending on the number of projects and employees they have at that time.
- The secure use of mobile technology services and data availability from virtually any location, offer flexibility and immediacy in work and decision making.
- Data analysis with the use of advanced primary data analysis methods support the projects' valid and timely monitoring, enabling the company to proceed with corrective actions, when necessary.
- The use of advanced SIEM (Security Information and Event Management) techniques, enables the Group to protect its information by identifying possible incidents of data interception or incidents of deception aimed at intercepting data.
- The use of the Business Process Management (BMP) tool to automate business processes.
- The use of special automation in the waste management plants to improve the speed and quality of the process.
- The improvement of the data backup process with cloud technologies, avoiding the use of cassettes, while also making the process more economical and reliable.

Based on the needs of the Group and its companies, the implementation of the following projects has been initiated and is in full progress:

- The development of a platform that collects and processes electricity generation data from the Group's RES projects, in a single central recording and processing system, utilising communication technology for the transmission and control of RES electricity generation data. The platform is in progress and is expected to be completed by the end of 2021.

- The development of a new Human Resources Management system, aiming to be the Group's one-stop reference point for employees, while also implementing a series of automated procedures related to employees, such as evaluations, management of leaves of absence, etc. The system is in progress and is expected to be completed by mid-2022.
- The development, within 2021, of an electronic e-Learning platform for informing and educating employees on various issues that concern them.
- The implementation of an Integrated Materials Management System in a unified and electronic manner, to enhance the process and speed and also to minimise the use of paper from demand of materials to consumption during any given project. The system is in progress and will provide a reliable basis for data analysis of hardware and service markets in order to reduce purchase costs.
- The completion, within 2021, of an electronic platform for collecting and processing data from the Group's companies in the context of sustainable development (ESG Monitoring Platform).

- The use of digital signatures on conventional documents for increased flexibility and speed in related processes.

The use of the cloud is constantly expanding, with the PaaS, SaaS, and IAS models, providing flexibility in operation mode as well as scalability, where necessary.

Cloud services were used to manage new hires, through the use of a special application, whilst much of the Group's data is stored in the cloud, increasing the flexibility of access from everywhere (mobility).

At the beginning of 2020 and due to the COVID-19 pandemic, the Group's planning, with respect to the implementation of remote work applications, was accelerated, ensuring that the Group's employees could continue to work safely.

The Group managed in a very short period of time to provide employees, that needed to work remotely, with the appropriate equipment and training, and to implement the necessary infrastructure to support teleworking safely. The service was welcomed by the employees, ensuring in this way the continuity of business operations at a very high level.



04 EMPLOYEES



Enhancement of the Human Resources Division's role in employee recruitment



Employee performance evaluation based on the new Group evaluation system



Development of a training plan, based on the results of employee performance evaluation

3 GOOD HEALTH AND WELL-BEING



8 DECENT WORK AND ECONOMIC GROWTH



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



4.1 WORKING ENVIRONMENT

ELLAKTOR Group's employees are the driving force behind the Group and its most significant comparative advantage. The Group's ability to implement complex projects under technical difficulties and stringent timelines, is attributed to its employees, who contribute their knowledge, professionalism and dedication to offer high quality services to customers and associates.

The Group invests in the well-being of its people and in shaping a positive working environment. It seeks to create the appropriate structures and working conditions that will promote employee training, development and advancement, offering equal opportunities and supporting diversity.

ELLAKTOR Group Employees

At the end of 2020 (31 December 2020) the Group employed 7,245¹ employees. 99% of employees are employed full-time and 89% have indefinite term contracts. 15% of employees work at the Group's Head offices, while the majority of employees (85%) work at the Group's construction sites and individual projects.

The majority of ELLAKTOR Group's operations are carried out by its employees. However, this practice differs in some of the operations in the Construction segment. More specifically, in public sector projects, the majority of the work is executed by Group employees and only a small percentage of the work (<10%) is executed by subcontractors. The subcontractors are predominately responsible for performing earthworks and concrete works. On the contrary, in building projects of the public sector, as well as most of the private sector, the majority of the work is executed by subcontractors (>95%). In such cases, the subcontractors undertake and perform concrete work, masonry, roughcasting, painting, flooring, etc. At the end of 2020 (31.12.2020), 1,611 subcontractors' employees were involved in Group activities and projects.

It is worth noting that 70% of employees and 50% of Management executives are from the local communities in which the Group operates.

Human Resources Management

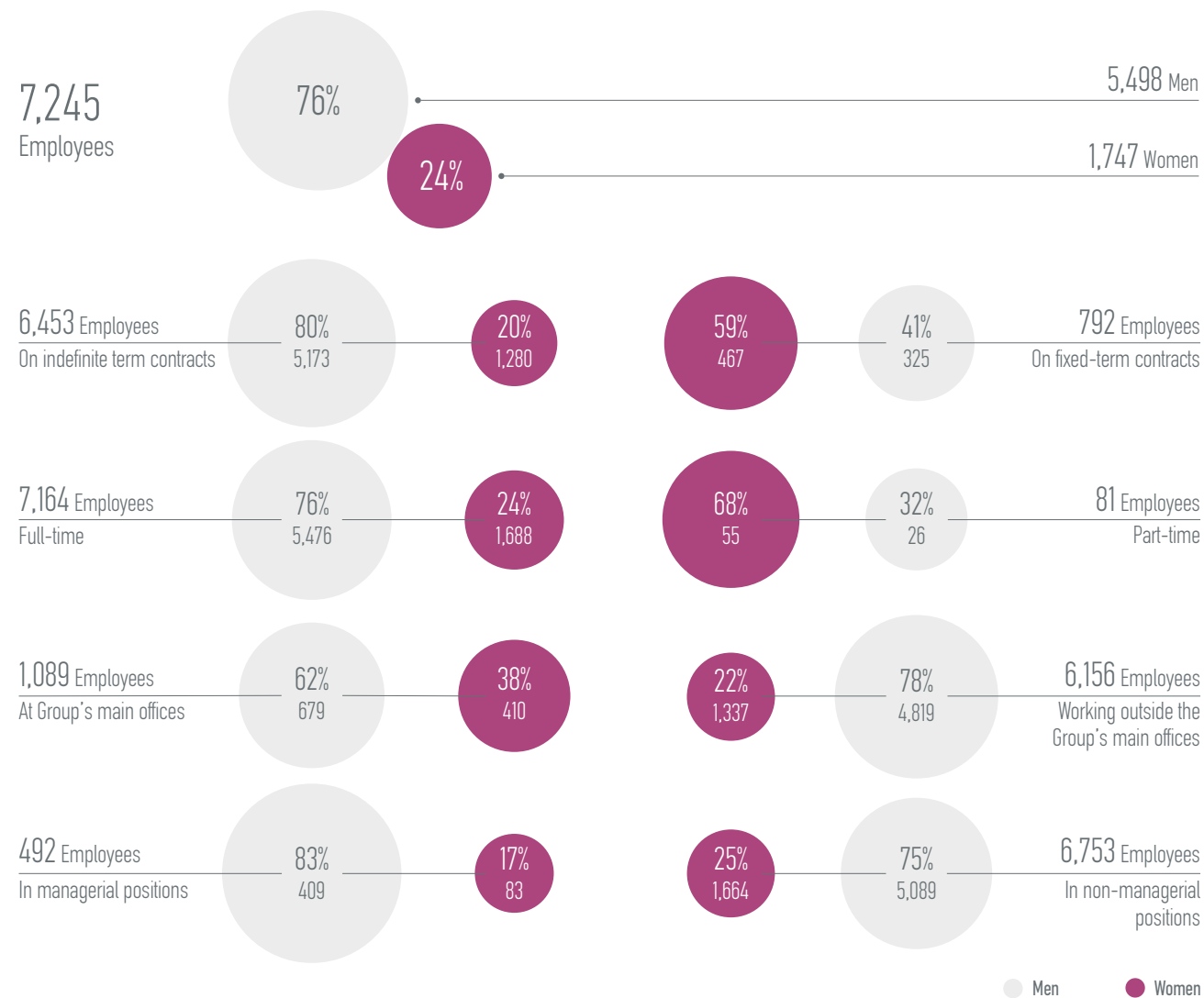
The Group aims to continuously improve its human resources management methods, by following best practices.

In this context, the Group has developed a forecasting system regarding hiring requirements and departures per company and Division based on the projects' progress. The aim of the system is to immediately cover any operational needs of a project throughout its life-cycle, while at the same time utilising existing staff and staff that will be available following the completion of their current projects in any open positions of the Group.

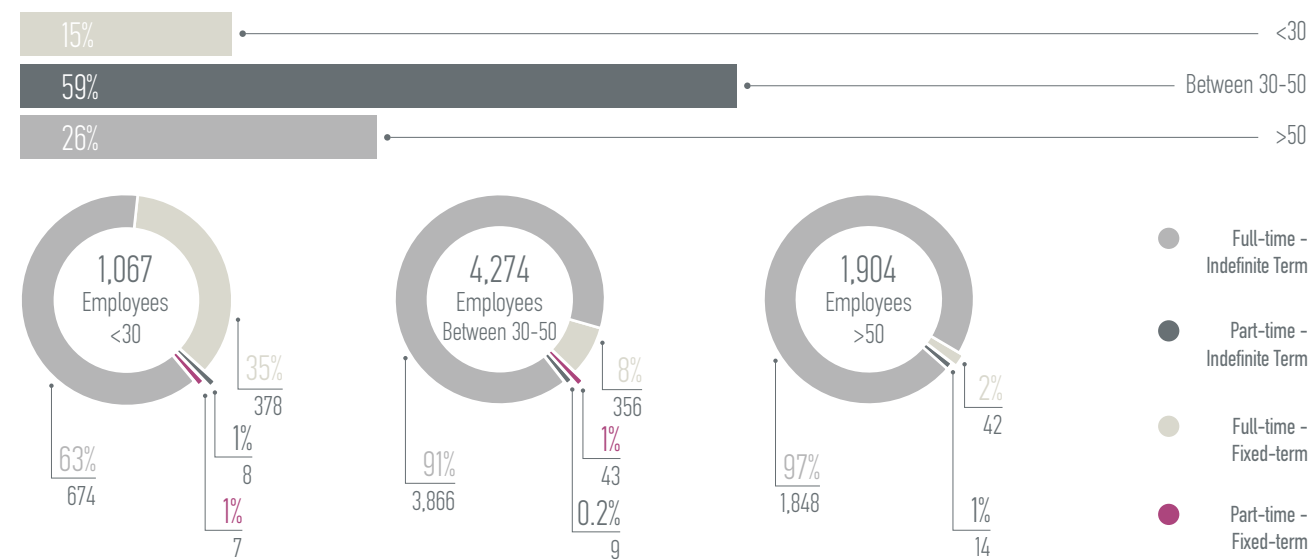
In 2020, the role of the Human Resources Division was enhanced to include the recruitment of staff for Executive and Head Office positions, as well as consulting in the hiring process of employees for sites/plants and other operating units of the Group. The cooperation with the Divisions of the Group's companies was strengthened and requests for hiring increased with the contribution of Human Resources Division. Emphasis was placed on the internal hiring process to enable the Group's employees to grow and evolve, fully utilising the knowledge and experience they already have. In 2020, 239 employees (204 men and 35 women) moved within the organisation to new positions within the same segment, while 208 employees (158 men and 50 women) moved to another segment. Of the 282 employees who were promoted, 27% were female employees.

¹ Refers to data of ELLAKTOR Group activities in Greece, Germany, Cyprus, Qatar, Romania and Jordan including hourly-paid employees and employees in Joint Ventures in which Group companies withhold more than 50% and/or exercise management.

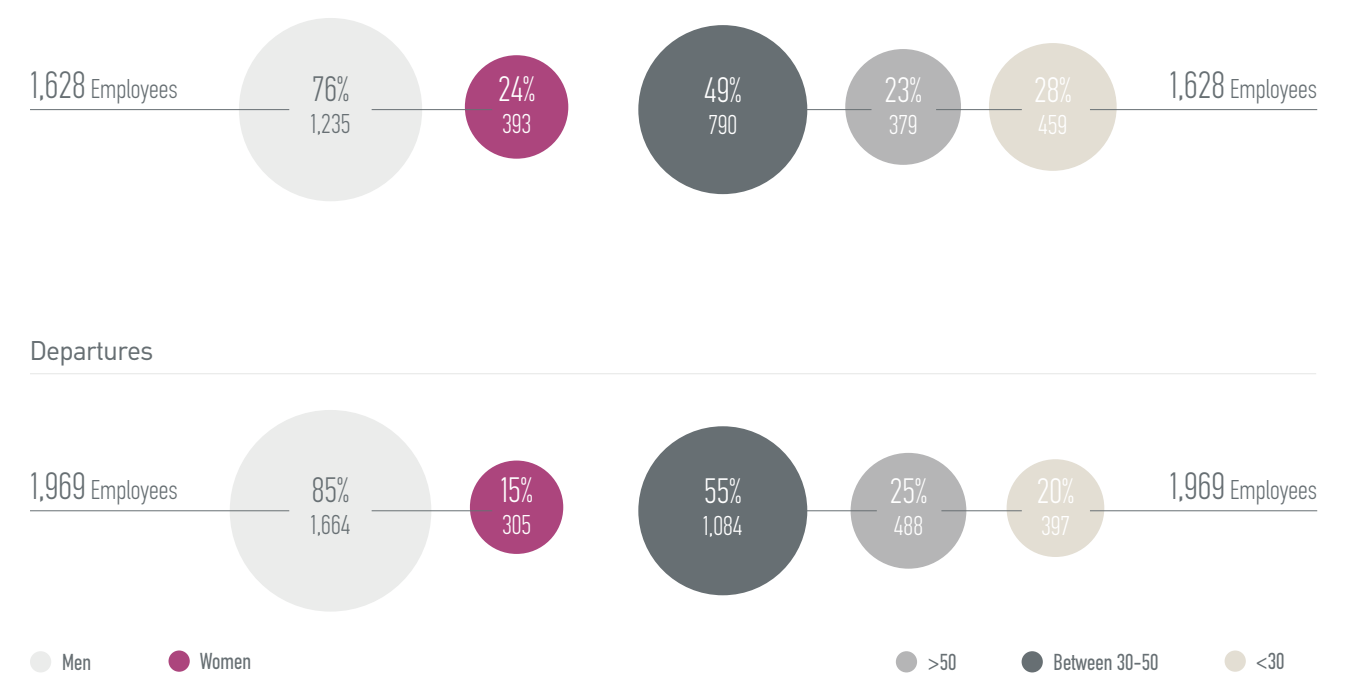
ELLAKTOR Group Employment Data



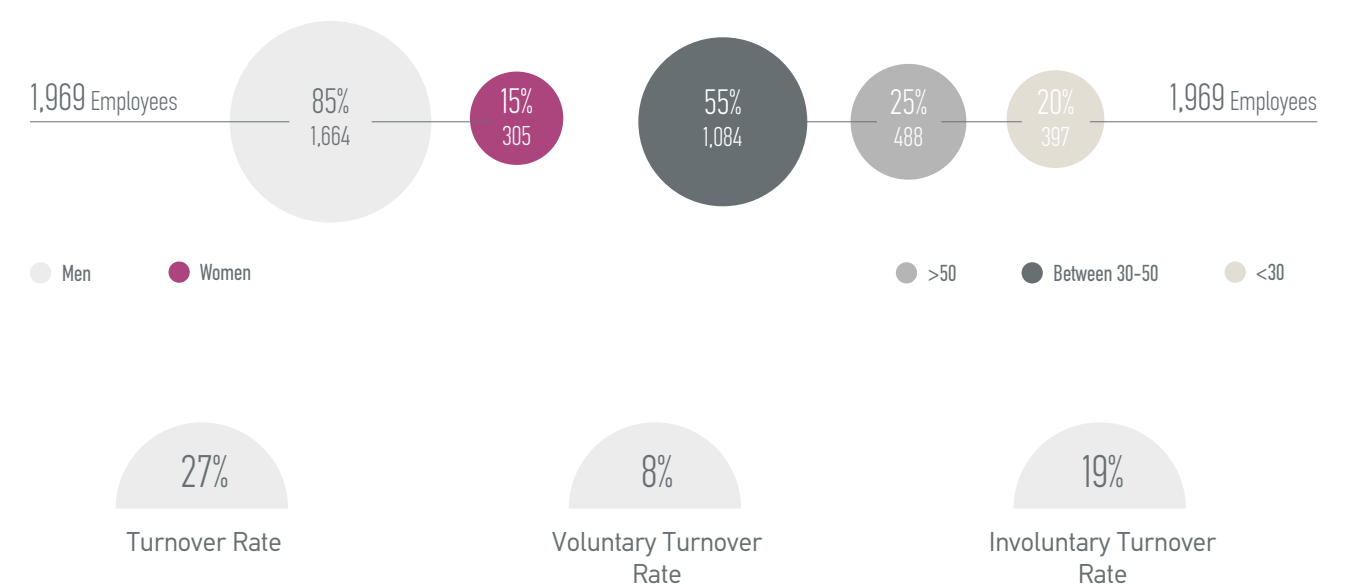
Employees per age group



New hires



Departures



Note: The turnover rates have been calculated using the number of employees who departed and the average number of employees per year.

In 2020, the Human Resources Division updated its former policies and procedures and established new ones, aiming to enhance transparency, equal opportunities and effective operation within the Group. These procedures are accompanied by new documents used by the Group companies and posted on the intranet (Portal).

At the end of 2019, for the first time, a survey was conducted on the engagement of the Group's employees. For this purpose, the questionnaire of the "Great Place to Work" institution was used, given that it has been statistically tested and applied in Greece over the last 20 years, enabling the Group to be compared with the best companies in Greece.

Employee Engagement Survey



CASE STUDY

From a random sample of 1,000 employees, 695 employees from all Group companies participated in the survey via paper and electronic questionnaires. According to the results, **employee engagement reached 69%**.

540 out of the 695 participants were employees without administrative rank, 82 were Chiefs, 31 were Managers, 7 were Senior Executives, while 35 did not state a hierarchical rank.

Areas with a positive impact:

- Friendly, pleasant and safe environment.
- Consistency in employer obligations.
- Fellowship, mutual respect, professionalism, communication, courtesy, high competence training.
- Building facilities/infrastructure.

- Accessible, flexible and consistent Management. Anthropocentric approach, showing confidence in the staff.
- Opportunities for continuous professional development / training and self-improvement.
- Participation in major projects.
- Implementation/management of new technologies.

Improvement Priorities:

- Improving the evaluation and reward system.
- Additional training programs.
- Improving internal communication.
- More employee benefits.
- Gradual replacement of staff in some departments / teams.

To meet the priorities that emerged from the survey, in 2020, the Group proceeded with the following actions:

- The Group Performance Evaluation System was used for the first time.
- A training plan was created for the employees who participated in the evaluation process and implemented the trainings which considered urgent.
- Personal meetings were held with about 70% of the Group's engineers, at their worksites. This action was implemented for the first time and initiated with the engineers as they are the largest specialty in the Group. Through this process, engineers were given the opportunity to be informed about initiatives related to Human Resources, but also to create a database with their specific knowledge, aiming for highest utilisation. At the same time, visits were made to construction sites of the Construction segment's companies in

Greece, Romania and Qatar, as well as to the facilities of the Environment segment in Greece, where brief introductory meetings took place with all the employees. These meetings / visits will continue in 2021 to cover all the Group's engineers and on an annual basis to cover new projects.

- Group insurance coverage was extended to more employees (2,700 compared to 871 covered previously).
- A travel insurance program was created for all employees traveling for business purposes outside Greece as well as an insurance program for Executives and their family members working permanently abroad.
- A pension program was created for the Group's executives.

The Group is going to continue conducting the employee engagement survey every two years.

Employee Training and Development

The training and development of the Group's employees constitutes one of the most important pillars for achieving the Group's business targets. In 2020, the Human Resources Division participated even more actively in the implementation of training programs in cooperation with the Group Divisions, utilising resources from LAEK (Account for Employment and Vocational Training). The training programs implemented in collaboration with the Human Resources Division are recorded and the individual requests for training are evaluated, so, if relevant, they can be carried out within other groups of employees in the future. For each individual Group's project, the data from the training activities is maintained separately within the records of the worksites / plants and other functional units. The target is for all training activities to be centrally monitored by the Human Resources Division.

In 2020, the recording of the educational qualifications, necessary to enhance the knowledge and skills of the Group's employees was initiated and a relevant database was created. At the same time, the formulation of the first thematic units of the ELLAKTOR Learning Academy was initiated, which is set to launch in 2022 and will include two main pillars:

- The Technical Academy, which will include trainings that enhance the technical knowledge of the employees for all subjects (finance, employee management, information technology, technical projects, etc.).
- The Leadership Academy, which will include training on leadership, administrative and personal skills.

In addition, procedures were revised, regarding the preparation and drafting of training plans, as well as for the implementation of training programs.

Following the completion of the Performance Evaluations for the year 2019, which took place in 2020, a training plan was established for the Group's employees that participated in the process. In particular, the training needs recorded by the participants during the performance evaluation were collected and divided into thematic units (e.g. health and safety, legislation, leadership, IT skills).

In the 4th quarter of 2020, the implementation of the training plan, as well as the programs on leadership issues and digital skills development began. The participants were divided into groups according to their educational needs and the level of knowledge they had. For the majority of employees who participated in these trainings, this need had been recorded in their evaluation.



The modernisation and restructuring of the Group have created training needs both at the Head office level as well as at the level of projects / activities. Traditional forms of education requiring the physical or remote presence of instructors cannot meet these needs. In this context, the Group is in the process of developing an online eLearning platform and complementary training material, in cooperation with the competent divisions, covering both technical matters and those relevant to Group policies and procedures.

This process will also contribute to the creation of a unified culture throughout the Group, as all employees will have access to standardised information, which they will be required to adopt on a day to day basis. In 2020, the procurement procedures were launched and an implementation plan was drafted, with the aim for all employees in Greece to have access to the platform by the end of 2021.

New hires training - Induction Training Manual

In 2020, Group proceeded with the update of the Induction Training Manual. The manual is already posted on the Group Portal, and available to both existing employees and to new recruits.

Main Topics of the Induction Training Manual are:

- 1. Presentation of the Group and Group History
- 2. Health and Safety
- 3. Sustainable Development

- 4. Digital Transformation
- 5. Human Resources
- 6. Useful Checklist

The Induction Training Manual provides new employees with useful information, ensuring a smooth and productive transition. Additionally, it provides employees with a checklist that acts as a tool for both the new employee and for the manager to monitor the progress of the training, as well as to identify any outstanding issues that should be covered in the future.



CASE STUDY

The Group encourages its employees to participate in seminars, conferences and trainings that focus on technical, technological, management, customer service and safety issues, which relate to the Group's activities. Often training is carried out internally, by instructors from within the company, especially in regards to health and safety matters, and environmental management issues.

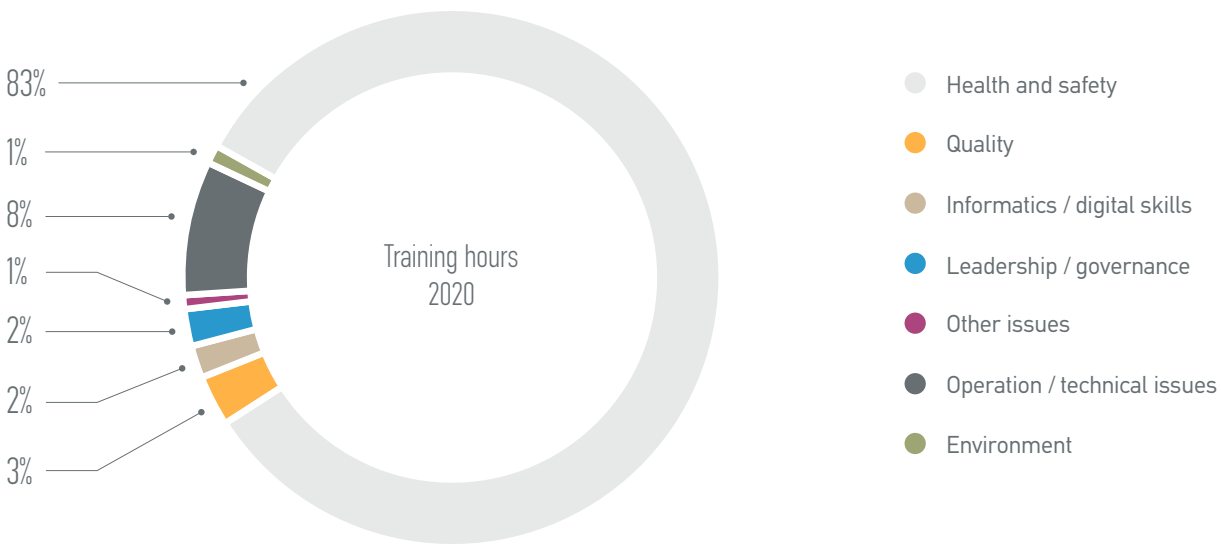
In 2020, 43,297 training hours were carried out (36,777 for men and 6,520 for women). It is estimated that the average training per employee was 6 hours (7 for men and 4 for women). The total expenditure of employee training for the year, amounted to € 106,035.

Due to the complexity of the Group and its individual companies' activities, each company/division requires different types of specialised training. For example, ATTIKI ODOS and ATTIKES DIADROMES organised

trainings/participations in conferences on the following topics:

- Theoretical safe driving program.
- Training in fire management in open spaces and vehicles and firefighting exercise.
- Communication crisis management during the COVID-19 pandemic.
- Customer service.
- Theoretical and practical training in toll collector's duties.
- Training and certification in sustainable development.
- Snow removal.

Training Topics



Employees Performance Evaluation

In 2020, the Group introduced a new Performance Evaluation process, which evaluated the results of the efforts of the Group's employees for 2019.

The implementation of the new system was planned for early 2020, in order to evaluate the performance for 2019.

However, the conditions that prevailed due to the pandemic, changed the original plan, resulting in the assessments taking place between May and June 2020. The Human Resources Division provided the necessary support during the evaluation period to both the evaluators and the employees being evaluated.

The evaluation was intended to involve all employees of the Head Offices, as well as the Directors / Managers / Supervisors / Managers of sectors and projects, employed in projects and other activities of the Group and its companies in Greece for at least three months in 2019 (excluding companies ATTIKI ODOS and MOREAS which have their own employee evaluation system).

In 2020, 131 evaluators were trained to use the new evaluation system, attending 20 trainings with physical presence and 4 online meetings totalling to 262 hours of training. 814 employees and executives were expected to participate in the evaluation. In total, 643 evaluations (79% participation) were completed and submitted to the Human Resources Division.

Aiming to enhance the Performance Evaluation, the performance in 2020 will be held in 2021, electronically via a new system. The evaluation will be more interactive, facilitate tracking of ratings and enable the creation of useful reports.

In 2020, 1,706 employees (985 men and 721 women) were evaluated, in particular 24% of all employees and 91% of eligible employees, i.e. employees included in the evaluation process.

Of the employees eligible to participate in the process, the participation rate of employees in managerial positions reached 75% and of other employees reached 94%.

New Group Employee Performance Evaluation Process



CASE STUDY

In 2019, the Group launched the Performance Evaluation System, which was designed by the Human Resources Division. The skills used to determine the performance of the evaluated employees, were proposed and adopted by the Group Management, during the design of the evaluation system. Each skill was analysed based on the behaviours that evaluated employees should demonstrate in their daily work. Two different evaluation forms were created, one for the Employees and one for Group Executives. For the presentation of the new system to the Evaluators, educational material and a detailed guide with examples of completed assessments were created, accompanied by educational meetings held, live and online. The evaluated employees were informed about the process by their supervisors and received a relevant information leaflet.

• **Two different forms: 1 for the Employees and 1 for the Executives** (Site Officers / Supervisors, Segment / Company Managers, Group Management Team).

• **Employee Form:** Assessment based on 5 Skills analysed in behaviours:

- 1. Efficiency
- 2. Health and Safety
- 3. Interpersonal Relations
- 4. Planning and Organisation
- 5. Teamwork

• **Executive Form:** Evaluation based on Corporate Objectives / Priorities (2 corporate goals for 2020 were recorded, while as the system was used for the first time, there were no recorded goals for 2019) and 6 Skills that are analysed in behaviours:

- 1. Efficiency
- 2. Health and Safety
- 3. Interpersonal Relations
- 4. Planning and Prioritisation
- 5. Creating Effective Teams
- 6. Development of Current and other Employees

• **Evaluation Scale:** Common 5-point scale

- 1. Does not meet expectations
- 2. Partially meets expectations
- 3. Meets expectations
- 4. Exceeds expectations
- 5. Role model example

Human Rights Support

For ELLAKTOR Group, respect of human rights is a non-negotiable value. In early 2021, a Group Human Rights Policy was established, which sets the framework and principles for the respect of human rights at work. The objective of the Policy is to safeguard the human rights of its employees and the employees within the supply chain, as well as of the local communities where the Group operates. The Policy is based on the principles of the United Nations Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, as well as the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO 87 and ILO 98). The employees of the Group have been notified of the new Policy, while notification of the suppliers, partners and subcontractors is in progress.

In accordance with the Human Rights Policy, the provision of equal opportunities is a mandatory condition. Throughout the recruitment and selection of potential candidates, the Group ensures that there is no discrimination in terms of race, age or gender and that equal opportunities are offered to people with disabilities. In 2020, three people with disabilities (male) were employed in the Group. All employees are at least 18 years old, while 20% of the Group's employees have a different nationality than the country in which they are employed.

In 2020, the evaluation and monitoring of the current conditions in relation to gender and age was initiated. The situation continues to be monitored on a monthly basis and is reflected in the Human Resources Division reports. It is noted that in 2020, no incidents of discrimination were reported.

ELLAKTOR Group is aligned with and follows the relevant labour legislation. Aside from ensuring salaries comply with the National Collective Bargaining Agreement, the Group follows and implements the clauses outlined by the labour legislation in relation to working hours, work schedules and payment of expected benefits/subsidies. 68% of employees are covered by the National Collective Labour Agreements in force in each country of operation covered by this Report.

There are no labour unions in the Group's companies. However, the Group, as a supporter of open communication, carries out meetings with labour unions from different sectors (Builders union and Salary based Technicians union). Moreover, it allows union representatives to enter the Group's premises and to inform the Group's employees on union matters.

Regarding parental leave and maternity leave, the Group fully implements the standards outlined in the current labour legislation.

In 2020, all 76 employees in the ELLAKTOR Group who were entitled to maternity leave, made use of it. 100% of the employees who were expected to return from maternity leave, returned to work normally. 85% of the employees who returned from maternity leave remained in the Group at least 12 months after their return. Employees who did not remain in the Group left voluntarily (termination of contract or resignation).

Employee Benefits

Throughout 2020, employee compensation and benefits were re-examined, with the aim of making them more competitive in relation to the Greek market.

The Remuneration and Benefits Department of the Group, applying the relevant Policy, evaluates, on an annual basis, the weight and contribution towards the Group's corporate results, of each unique job in the organisation, which is associated with a specific "Grade". "Grades" are grouped into "Clusters" and every "Cluster" is assigned with a range of salaries and special benefits, which are based on survey data related to compensation and benefits. Any discrepancies detected, are resolved gradually.

The Group provides its employees with a group life insurance programs, as well as additional medical insurance. All employees are entitled to these benefits, except for part-time employees who are employed occasionally in Group projects or operational units. Additionally, protected members from employees' families may also be eligible for coverage (with a small charge on the employee).

To ensure the systematic enhancement and care of its employees, the Group's companies offer a series of benefits, including:

- Provision of company car, fuel card, transceiver (i.e. e-pass) and mobile phone, based on the position held.
- Monthly kindergarten allowance to employees with kids of preschool age.
- Renting of accommodation for Group executives, if a change of residence is required.

In addition, bus transport is offered to employees during arrival and departure times to and from the Group's Head offices free of charge.

Amongst other things, the Group offers sports activities for its employees, aiming to encourage teamwork and enhance its staff's mental and physical health.

An annual Christmas event is organised for employees' children, in order to strengthen employees' families. Also, the employees' children are eligible to stay at recreational children's camps during the summer period.

In 2020, due to the special circumstances caused by the COVID-19 pandemic, no events were organised that would include the participation of employees and / or their children.

By following a similar policy and recognising the major importance of education for young peoples' future, ATTIKI ODOS has established an annual scholarship that is offered to employees' children.

4.2 HEALTH AND SAFETY

Safeguarding health and safety of all Group employees is an important part of the Group's overall corporate culture and philosophy. The Management is committed to:

- Continuously maintain and improve health and safety in the workplace.

- Facilitate employee consultation and participation in the design and review of Health and Safety Management Systems.
- Comply with existing national and European legislation and implement all regulatory requirements, including the required inspections and control actions.
- Conduct continuous training and informing of its employees on issues related to health and safety in the workplace.

The Group aims to minimise accidents in the workplace, by preventing and assessing occupational risks and taking all necessary precautionary measures.

In 2020, the Group's Health and Safety Division, in collaboration with the Heads of Health and Safety of each subsidiary, implemented the following new actions aimed at ensuring and improving performance in matters of employee health and safety:

- Appointment of a Health and Safety Manager in addition to the Safety Engineers and/or Safety Coordinators in Group projects / facilities and training them.
- Issuance of, at least, monthly Safety Flashes for projects / facilities with different themes each time, depending on the needs, to train, inform and raise awareness of all employees.
- 15-minute Health and Safety sessions with the participation of worksite employees at the start of workday, during which health and safety issues relevant to the day's works are discussed.
- New tool to monitor Improvements / Suggestions and Non-Conformances that includes deviations from established procedures and instructions, as identified in internal audits, in order to improve the follow-up process and ensure the removal of such deviations.
- Improve Control by using checklists for all tasks (guide for the daily inspection / audit of projects / facilities by the Safety Engineer). The Health and Safety Checklist is a tool for assessing health and safety conditions, according to the basic requirements per job.
- Announcement, recording, classification and evaluation of all accidents (even those which do not require absence from work) in a common Group format.

- New Monthly Health and Safety Report to monitor the basic performance requirements of health and safety in the projects / facilities of the Group.
- Regular recording of COVID-19 cases by all Group companies.

It is estimated that, in 2020, the total expenditure for actions that ensured health and safety of the Group's employees (e.g. actions taken due to the pandemic, for personal protective equipment, measurements, etc.), amounted to € 2,787,924.

Health and Safety Management

In order to comply with common procedures and objectives related to occupational health and safety, a Health and Safety Division operates at Group level and Health and Safety Departments at the companies level, with the exception of the RES segment. In October 2020, AKTOR FM, HELECTOR, and ATTIKI ODOS / ATTIKES DIADROMES upgraded their Health and Safety Management Systems and received certification from an external body in accordance with the ISO 45001: 2018 standard. The company TOMI is in progress for the upgrade of its Health and Safety certificate according to the ISO 45001:2018 standard.

In order to monitor the compliance of the projects based on the requirements of the current legislation more systematically, the internal procedure "Monthly Health and Safety Report - MHSR" is applied. MHSR includes the basic legal elements controlled during the inspections and is a tool that enhances communication between the central Health and Safety Division with the Group projects/activities on a monthly basis. The procedure, which applies to all activities of the Group, was revised in 2020. MHSR was redesigned with the addition of automatic logic checks in a new, user-friendly, interface. Subsequently, the companies' Health and Safety Managers were trained in its implementation as well as in the systematic monitoring of the level of safety in projects / facilities. In August 2020, the implementation of the revised procedure for Monthly Health and Safety Reports was initiated at projects / facilities of AKTOR, TOMI, GREEK QUARRIES, HELECTOR, ATTIKI ODOS/ ATTIKES DIADROMES, MOREAS, YIALOU EMPORIKI and TOURISTIKI. The adoption of the process by all projects and Group activities is in progress. The Group also records and monitors key performance indicators (e.g. accident severity index, accident frequency index, training indicators, etc.) and health and safety targets, in order to evaluate the performance of projects in terms of health and safety.

In accordance with the current procedures, each Group project/activity, is obliged to appoint a Health and Safety Officer, a Health and Safety Engineer (Technician and/or Safety Coordinator), as well as an Occupational Physician (if necessary), to supervise the implementation of proper practices during the execution of projects.

The role of the Health and Safety Officer, is to coordinate and control all health and safety issues of the project with a physical presence. In addition, the Health and Safety Officer follows the internal procedures, informs the company's Health and Safety Manager of any unsafe actions, supervises the Safety Engineer, completes the MHSR and conducts trainings. The Group's goal is to appoint a Health and Safety Officer with a physical presence in all companies and projects / activities of the Group. By the end of 2020, they had set designated Health and Safety Officers in 87% of projects in activities of the Construction segment, and 100% in the Environment segment.

It is noted that the Group has Occupational Medical Offices in its facilities. Indicatively, the Occupational Medical Office of ATTIKI ODOS and ATTIKES DIADROMES has assembled remote medical offices at key points of the Attiki Odos motorway and proceeded with the provision of first aid training to a number of employees. In addition, workplace hygiene inspections are carried out by the Medical Office, while the Visiting Health Physicians consult and raise awareness among employees on important health issues. Due to the nature of the Group's projects, there is a risk a number of employees to be exposed to natural, chemical or biological hazards. Therefore, very strict precautionary measures are taken and medical examinations are systematically provided to employees, together with measurements of harmful factors in the workplace.

Internal Audits / Inspections

The Health and Safety Officer and the Health and Safety Engineer, in collaboration with the Occupational Physician, conduct regular inspections on the worksites and the working conditions, assessing the level of conformance with the project safety rules. Also, they examine the implementation of appropriate Personal Protective Equipment and draft/update the Written Occupational Hazard Assessment (WOHA), in accordance with the applicable legislation, as well as the requirements of the Health and Safety Management Systems (HSMS).

In addition, they are responsible for employee health and safety training, identification of good practices, proposing improvements in performance in such matters and promoting relevant policy at all employees' levels.

The Occupational Physician assesses the occupational hazards relating to employees' health by conducting regular inspections at the workplaces, and handing out brochures. In order to ensure employees' occupational health, the Occupational Physician issues eligibility certificates after considering each employee's medical history.

The central Health and Safety Departments of the Group companies conduct internal audits, based on an annual program, in the context of HSMS implementation, through which:

- potential non-compliance/discrepancy issues are identified and the appropriate corrective actions are implemented, and
- it is confirmed that the HSMSs operate sufficiently and that there are no health and safety impacts which have not been recognised and/or treated.

In 2020, occupational health and safety audits were carried out in approximately 37% of the Group's projects and activities. Indicatively, 43% of the activities in the Concessions segment, 28% of the activities in the Environment segment and 42% of the projects in the Construction segment were audited. During the audits, more than 230 observations, deviations, and suggestions for improvement were identified and registered. The implementation of any agreed corrective actions is in progress.

It is noted that the Group aims to increase the number of inspections carried out in its activities, including also its subcontractors. Inspections of subcontractors' teams are carried out across all Group companies. Indicatively, in 2020, random inspections were performed on 10 subcontractors and their crews of AKTOR.

Accidents Management

In case of an accident involving a Group employee, or an employee hired by a subcontractor/supplier, that takes place in a Group's workplace, the Emergency Response Plan is activated in accordance with the HSMS and a series of actions is followed in order to inform:

- the project/activity's Management,
- the Human Resources Division, the company's Health and Safety Manager, Group's Health and Safety Division, etc.,
- the state bodies that relate to the investigation and recording of the accident, and
- the Client and/or other third parties.

For every accident, a relevant assessment and categorisation is carried out, depending on the type of injury and nature of the accident. The people in charge of these actions are the Health and Safety Engineer, together with the Occupational Physician of each project/activity. All accidents are reported on the Ministry of Labour's internet platform.

After each incident, the Group companies investigate the causes in collaboration with the investigation team, which includes the company's Health and Safety Manager, the project's Safety Engineer, the injured employee, and anyone else involved in the incident. During an internal training for the company's Health and Safety Officers, AKTOR established a new procedure, which incorporates also the participation of the worksite's Manager as well as the foreman of the crew, whose employee was involved in the accident, in the incident's investigation team. The investigation team analyses the accidents' causes and then appropriate measures are taken to prevent similar incidents from occurring in the future. The Health and Safety Division, in collaboration with the Health and Safety Managers, the Safety Engineer and the Occupational Physician, organise new training courses and internal communication actions, ensuring that the safety measures are being applied and followed for the entirety of the project/activity. In addition, the WOHAs are updated, where applicable.

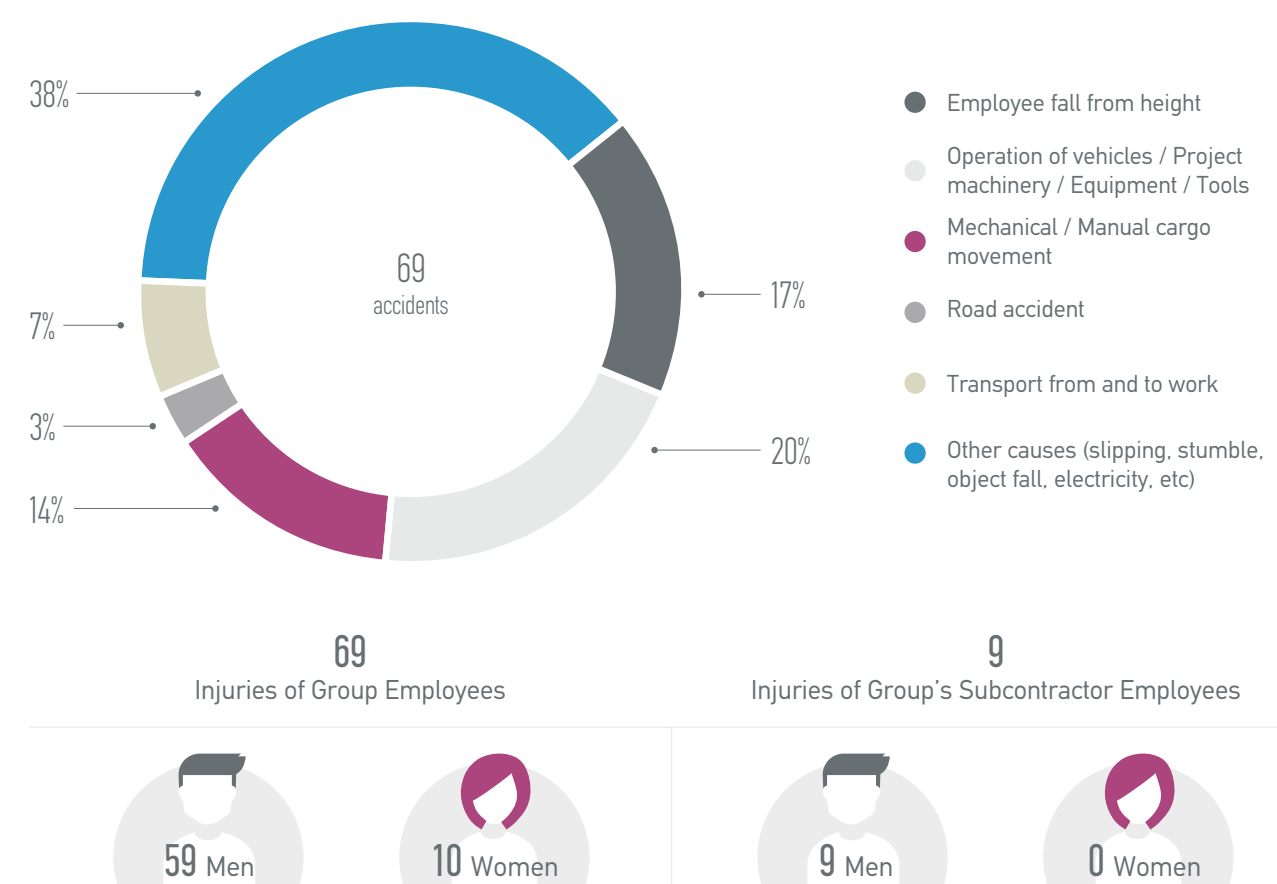
According to the requirements of the Group companies' Health and Safety Management Systems, "near-misses" are also recorded. "Near-misses" refers to sudden events in the workplace, where no employee injury, illness or physical harm took place. The recording, reporting and analysis of these incidents is important for the improvement of the existing HSMS and of the protection measures. In 2020, 55 "near-misses" were recorded by the Group's companies.

Health and Safety Performance Indicators

In 2020, the Group's companies recorded 69 employee accidents (excluding pathological cases and fatal accidents), of which 60 were minor and 9 were serious.

There was no accident in 92% of active projects and activities. It should be noted that out of the 60 minor accidents, 24 resulted in zero days of absence from work.

Accidents Causes / Nature



Note: Excludes incidents due to pathological causes.

In 2020, fatal accidents occurred, involving two AKTOR employees and two subcontractors' employees. In order to avoid such incidents, a series of actions were approved and implemented, some of which related to the projects in which the events occurred and others related to all of the Group's activities. Indicatively:

- Retraining of all project's employees regarding the safety guidelines for Project Machinery.

- Retraining of all operators and assistant operators on the health and safety guidelines for the Project Machinery as well as the Specific Rules for the rock / stone grinding equipment.

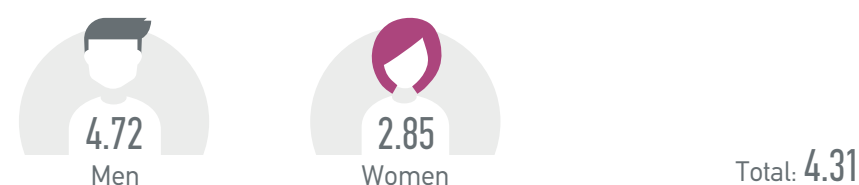
- Appointment of a Health and Safety Officer in every project in addition to the designated Safety Engineers and/or Coordinators and training them.

- Increase of internal audits and inspections.

- Development of a self-assessment tool for health and safety measures in projects (Health and Safety Checklist).
- Application of a 15-minute Health and Safety session at the beginning of the work day in each crew.
- Distribution of monthly safety flashes in all projects and a special Safety Flash relevant to works on or near energised electrical systems.
- Increase of daily presence hours of projects' Safety Engineer.
- Enhancement of project's Health and Safety Department resources.
- Planning of specialised training with an external certified body for project employees as well as employees of similar projects.

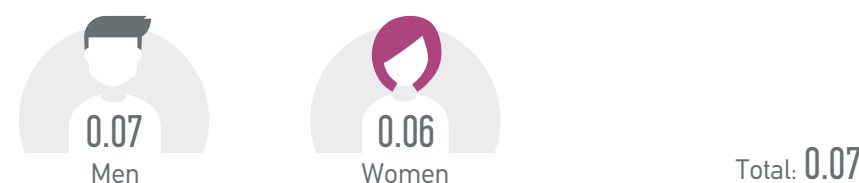
Health and Safety Performance* Metrics for Group Employees

Accidents-Incidents Frequency Rate



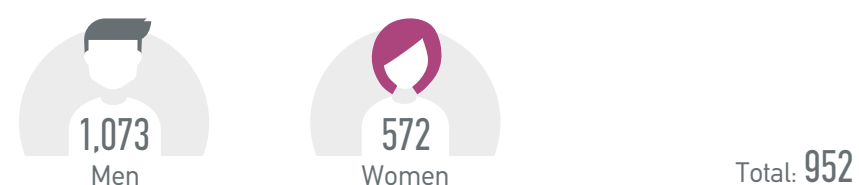
Accidents-Incidents Frequency Rate = (Total number of accidents / Total number of working hours) x 1,000,000. The metric presents the number of accidents per 1 million working hours.

Accidents-Incidents Severity Rate



Accidents-Incidents Severity Rate = (Total number of hours lost / Total number of working hours) x 100. The metric presents the working hours lost due to accidents per 100 working hours.

Accidents-Incidents Rate



Accidents-Incidents Rate = (Total number of accidents / Total number of employees) x 100,000. The metric presents the number of accidents per 100,000 employees.

* The calculation of metrics do not include fatal accidents, incidents due to pathological causes and any minor-injuries (first-aid), while incidents with zero days of absence from work were included, if on the day of the incident it was deemed appropriate to transfer the injured employee to a hospital or a health centre.

Training on Health and Safety

In order to ensure employees' awareness on health and safety issues, as well as the improvement of the performance of processes in place, employee training is required to be carried out on a regular basis. Throughout training, emphasis is placed on the health and safety impacts of non-compliance with the relevant rules and instructions, on the avoidance of accidents, and on the benefits of employees taking precautionary measures and complying.

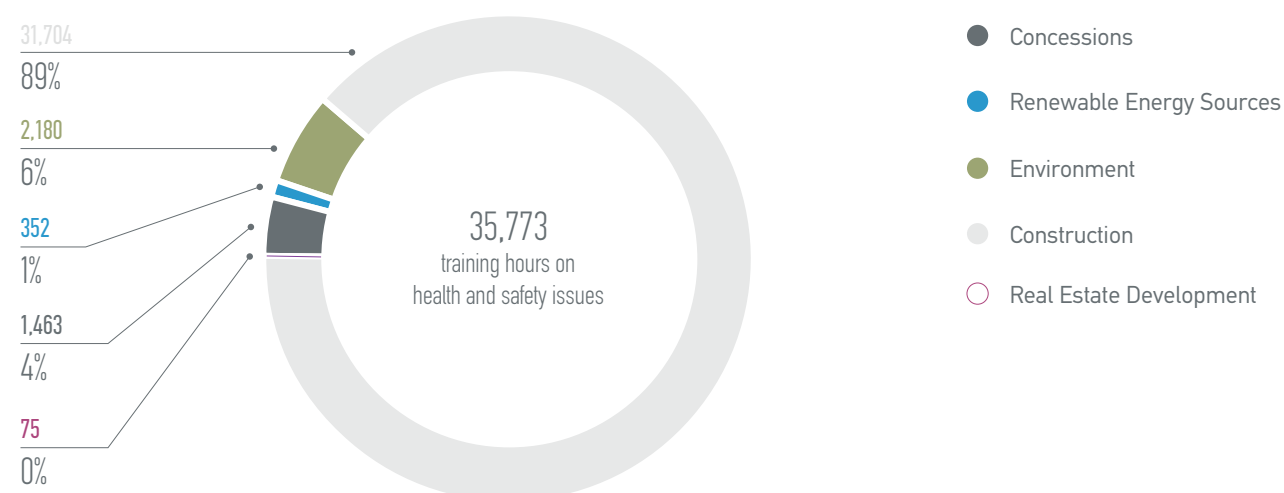
During the audits, the Health and Safety auditors, identify in collaboration with the individual managers, the training requirements with respect to Health and Safety issues in the different operating activities of the Group. In addition, each area/project Manager is enabled to assess employees' training requirements and submit proposals for employee training to the Group's Health and Safety Division, in collaboration with the Health and Safety Engineer.

Each newly hired employee working in all Group projects/activities is informed on the adopted Health and Safety policy and management system, the general safety rules that apply, the persons responsible for safety-related issues (safety engineer, coordinator, occupational physician) and the risks of the task to be performed. All employees, who work at ELLAKTOR Group's Head Offices have access to the "Health and Safety Guide for employees working at ELLAKTOR Group's Head Offices", while employees working at construction sites, are trained based on the brochure "General Occupational Health and Safety Instructions for all Specialisations" as well as on the Health and Safety Guidelines outlined in the Health and Safety Systems of each project / facility.

By the end of 2020, all Health and Safety Managers of the Group companies had been trained on health and safety issues. Also, according to the training program on health and safety at work for executives and employees in positions of responsibility, 77% of AKTOR's Health and Safety Officers participated in internal and external training and 8% of HELECTOR's Health and Safety Officers participated in external trainings. Relevant trainings will also be implemented in the other companies as well.



Training Hours on Health and Safety Issues



Among other, the following trainings / seminars were conducted:

- A practical Fire Safety exercise was conducted by ELLAKTOR Group headquarters' Head of Fire Safety, which included a partial evacuation of the 1st basement in building B'. Part of the Group's Fire Safety team participated in the exercise, with the aim of continuous training and preparedness in case of emergency. The practical fire safety exercise involved 33 employees, 10 of whom were members of the team.
- A distance learning seminar, with a duration of 7 hours, was implemented on Electrical Safety (substations - wind turbines), from an external organisation (TUV HELLAS) to 15 employees of ELLAKTOR and one employee of AKTOR FM.
- A distance learning seminar, with a duration of 6 hours, that concerned two groups of employees, on the topic of Safe Work at Construction Sites, the Roles of Project's Stakeholders in Health and Safety, was provided by the external body (TUV HELLAS) to the 43 Health and Safety Managers of AKTOR.
- A two-day seminar on "Working at Height on PPC electricity towers and Electricity" from the Hellenic Institute of Occupational Health and Safety (ELINYAE) was provided to 29 AKTOR employees (HEDNO Projects in Pyrgos - Nafplion - Tripoli).
- A two-day "Internal Health and Safety Inspector" seminar according to the ISO 45001:2018 standard, with a duration of 16 hours, was provided by TUV Hellas. The seminar was offered to two Health and Safety

Managers of HELECTOR and HELLENIC QUARRIES and one Auditor of AKTOR.

- Occupational Health and Safety Seminars, with a duration of 5 hours, were implemented by an external certified instructor with the participation of 87 employees of the Consortium HELECTOR SA-TH.G.LOLOS-CH. TSOMPANIDIS OE-ARSI SA.
- A distance learning seminar, with a duration of 6 hours, was provided to 24 Health and Safety Officers and Engineers of HELECTOR, on "Basic Principles of Health and Safety at Work" by an external body (TUV HELLAS).
- An in-person seminar on Fire Safety was carried out by the PYROGNOSI company. The 6 hours seminar was provided to 7 employees of HELECTOR's worksite in Chania.
- Seminars entitled "Quarries Risks and Precautionary Measures", with a duration of 3 hours, were implemented by the Hellenic Institute for Occupational Health and Safety and the Safety Engineer of HELLENIC QUARRIES. The seminar was attended by 16 employees from the 3 quarries located in Thessalia.

Finally, the Group aims to standardise the recording of the training courses attended by the employees of the subcontractors. In this context, training certificates are issued to subcontractors who have completed the appropriate training. The signed documents are reviewed during internal audits. The systematic recording of these trainings in electronic files by project/ activity is in progress. According to available data, in 2020, the employees of the Group's subcontractors attended **2,243 training hours** on health and safety at work.



05 ENVIRONMENT



Completion and operation of 2 wind farms and 1 biogas exploitation plant for electricity generation, with a total capacity of 93.52 MW



The waste treatment plants of the Group's companies managed 885,614 tons of waste



Trial operation of the first thermal energy from biomass generation plant in Greece, with a total capacity of 30 MW

7 AFFORDABLE AND CLEAN ENERGY



8 DECENT WORK AND ECONOMIC GROWTH



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



5.1 CONTRIBUTION TO THE GREATER AVAILABILITY AND RELIABILITY OF RENEWABLE ENERGY RESOURCES

ELLAKTOR Group, recognising the business opportunities offered in the energy sector, seeks, through its activities, to contribute in the combat against climate change and the efforts towards the energy transition, decarbonisation of electricity generation and access to affordable and clean energy for all. In this view, ELLAKTOR Group has prioritised the Renewable Energy Sources segment (RES), placing particular emphasis in the construction and operation of wind farms, as well as in the energy recovery from biogas, through the activities of the Environment segment.

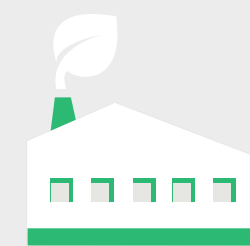
It aims to further contribute to the greater availability and reliability of RES, which are the basic requirements for reducing greenhouse gas emissions and preventing climate change.

It is noted that ELLAKTOR Group, through the design and development of biogas exploitation plants, contributes to the prevention of climate change not only through the substitution of fossil fuels, but also thanks to the efficient utilization of methane emissions released from landfill sites. Methane is one of the most powerful gases that contributes to the greenhouse effect.

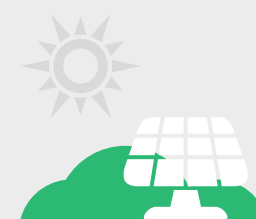
Key figures of the Group in 2020



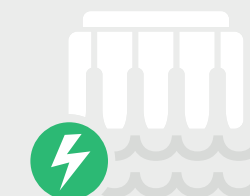
27 wind farms
494 MW capacity
1.046 GWh generated electricity



4 biogas exploitation plants
37 MW capacity
194 GWh generated electricity



1 photovoltaic park
2 MW capacity
3 GWh generated electricity



1 small hydroelectric power plant
5 MW capacity
7 GWh generated electricity

The Group companies that invest in RES projects are part of the RES segment (24 wind farms, 1 photovoltaic park, and 1 small hydroelectric power plant) and the Environment segment (3 wind farms and 4 biogas exploitation plants). In total, the Group companies operate 27 wind farms with 494 MW total capacity. In 2020, 2 wind farms of 90 MW total capacity were completed and put into full operation at the Municipalities of Zitsa and Pogoni in Epirus. In addition, 1 biogas exploitation plant of 3.52 MW total capacity is currently in operation for electricity generation at the Municipality of Lagadas in Thessaloniki.

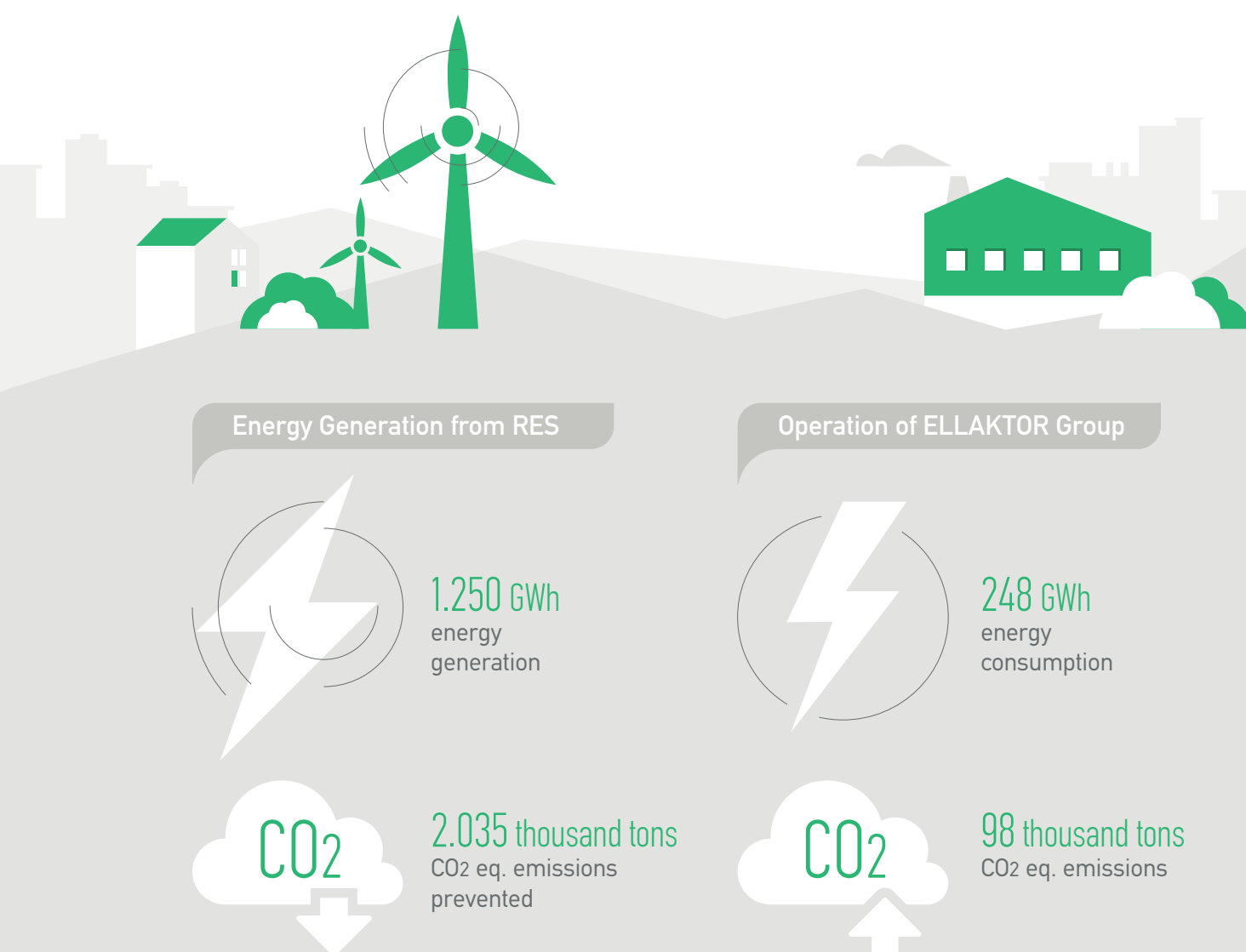
In 2021, the construction of 2 additional wind farms in Evrytania, of 88.2 MW total capacity, is being scheduled, while wind farm projects of 454.1 MW total capacity, are in various stages of the licensing procedure.

In early 2021, the Interministerial Committee of Strategic Investments approved the investment plan "Evia Wind

Energy Farms of 470.4 MW total capacity" that will be jointly developed by ELLAKTOR Group and EDPR, with a total budget of € 489 million.

Through the generation of 1,250 GWh of electricity from RES in 2020, it is estimated that the Group contributed to the prevention of 2,035 thousand tons of CO₂ eq.¹ being released in the atmosphere. It should be noted that the Group consumed 248 GWh (see section **Management of Environmental Footprint**), and hence its energy balance for 2020 amounted to -1,002 GWh.

¹ For the calculations, the CO₂ coefficient included in the Energy Investment Guide of the Ministry of Development and Investment (2005), as well as the amount of methane collected and used in the biogas plants have been used. The difference from the published data in the 2020 Financial Report (Data in the Financial Report: 2,032 thousand tons of CO₂ eq.) is attributed to the update of the calculation methodology.



Group companies' RES projects in operation in 2020

Municipality	Location	Installed Capacity (MW)	Type of Project	Green Bond Revenues allocated to projects (€ mil.)
Alexandroupoli	Magoula Kazakou Diplon	23.00	W/F	42.3
Alexandroupoli	Magoula Kazakou Diplon - Extension	16.10	W/F	20.3
Argos-Mycenae	Mount Ktenias / Psilo Lithari -Kontodiasela	23.00	W/F	30.1
Argos-Mycenae	Lekana	2.00	Solar	10.8
Argos-Mycenae Tripoli	Lyrkeio	41.40	W/F	50.2
Arriana-Alexandroupoli	Orfeas-Eptadendros	28.80*	W/F	24.1
Voio	East Askio Maestros	36.60*	W/F	37.9
Voio	West Askio	40.20*	W/F	40.9
Grevena	River Smixiotikos	4.95	SHPP	
Thermi	BEAL Tagarades	5.05	Biogas	
Thiva	Pefkias	10.35	W/F	10.1
Karystos	Kalinousiza Karpastoni	1.20	W/F	
Kefalonia	Monolati-Kseroliba	13.60	W/F	
Kefalonia	Monolati-Kseroliba - Extension	6.40	W/F	8.2
Kefalonia	Agia Dinati	32.20	W/F	40.98
Kefalonia	Agia Dinati - Extension	2.35	W/F	3.3
Kos	Krotiri	3.60	W/F	3.8
Lesvos	Skamniouda-Pachis Ridge	4.80	W/F	
Lesvos	Skamniouda-Madera Ridge	4.20	W/F	
Movemvassia	Mali Madi Metamorfossi	7.65	W/F	12.6
Movemvassia	Kalogerovouni-Poulos	17.10	W/F	21.3
Movemvassia	Gropes-Rahi Gioni	18.90	W/F	23.7
Patmos	Kokkinos Kavos	1.20	W/F	1.5
Rhodes	Chalatas	3.00	W/F	4.0

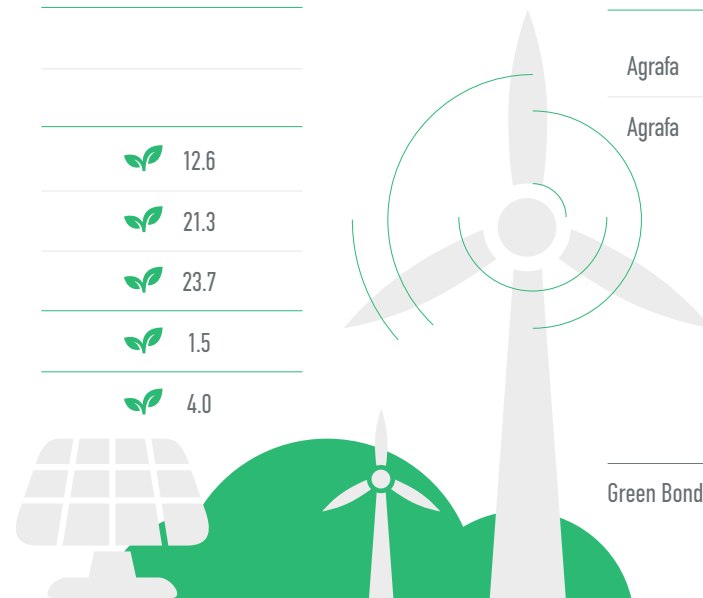
*In trial operation.

Group companies' RES projects in operation in 2020

Municipality	Location	Installed Capacity (MW)	Type of Project	Green Bond Revenues allocated to projects (€ mil.)
Trizinia	Asprovouni	20.70	W/F	29.4
Trizinia	Ortholithi	20.70	W/F	29.5
Trizinia	Psili Rahi-Lapoussa-Spasmeni Plaka	16.10	W/F	22.5
Trizinia	Vromosikia	11.05	W/F	15.6
Fyli	BEAL Fyli	24.20	Biogas	
Zitsa and Pogonio	Kasidiaris 1 Karnies -Karavamia-Elatos	50.40	W/F	53.1
Pogonio	Kasidiaris 2 Agriahladia -Pr. Ilias-Petra Haidos -Diavolorahi-Pr. Ilias	39.60	W/F	42.6
Lagkada	Mavrorachi Landfill	3.52	Biogas	
Jordan	Amman	4.68	Biogas	
		538.6		578.78

Group companies' RES projects under construction

Municipality	Location	Installed Capacity (MW)	Type of Project	Green Bond Revenues allocated to projects (€ mil.)
Agrafa	Grammeni - Tourla - Karnopi	46.20	W/F	52.0 (budget)
Agrafa	Michos - Boidolivalo - Apelina	42.00	W/F	58.0 (budget)
		88.20		110

Green Bond Note: RES project financed by the Green Bond: 

Green Bond

The Group, by applying practices of responsible operation, focuses on the effective management of its environmental impacts, while at the same it invests in enhancing its activities in the RES and Environment segments. Within this framework, it explores financing opportunities which value responsible investing criteria (ESG –Environment, Social and Corporate Governance). In the end of 2019 and early 2020, the Group issued 2 international green bonds, amounting to € 670 million. Both bonds received the “Eligible Green Project Criteria” certification from the Climate Bonds Initiative (CBI). According to the certification criteria, the bonds are tied to RES projects that are either already in operation or under construction (see tables on **RES projects** above).

It should be mentioned that 100% of the revenues from the two aforementioned bonds, amounting to € 670 million, have been allocated to RES projects that are already in operation / trial operation (€ 578 million in total) or are under construction (remaining € 92 million) and therefore there are no unallocated revenues.

With regards to the RES project portfolio of the Green Bond (see **tables pages 84-85**), through the generation of 983 GWh of electricity in 2020, the Group contributed to the prevention of 837 thousand tons of CO₂ eq. being released into the atmosphere.



5.2 CONTRIBUTION TO CIRCULAR ECONOMY

In the circular economy model, the value of products and materials, is retained for as long as possible by extending their lifetime and increasing their recycling and reuse rates. The transition to a circular economy requires fostering and implementing modern and innovative waste management methods, aiming to fully maximise the use of waste.

The Group's and, in particular, the Environment segment's activity are indissolubly linked to the circular economy, as through HELECTOR, is operating in the field of waste management. HELECTOR is one of the largest companies specialising in Waste Management in Southeast Europe, while it is active throughout the whole spectrum of the design, construction and operation of modern waste treatment plants, biological waste treatment plants and energy recovery from biogas in landfill plants.

At the same time, the company holds important know-how in energy recovery from landfill biogas. The electricity generation plants with 24.2 MW of capacity at the Fyli landfill site, which was designed, built and operated by the Group, are among the largest plants worldwide. The Group's portfolio in Greece and abroad includes, amongst other things:

- The Integrated Solid Waste Management (ISWM) plant in West Macedonia, which is the first Waste Management Public-Private Partnership (PPP) project, with a capacity of 120,000 tons per year.
- The operation and maintenance of the Mechanical Recycling and Composting Waste (MRCW) plant in Liosia, with a capacity of 350,000 tons per year.
- 13 Waste Treatment Plants (WTP) with a total capacity of more than 2.2 million tons per year.
- The Hazardous Medical Waste Incineration Plant is the only licensed incineration facility for medical waste currently in operation in Greece, using the method of heat treatment (incineration), with a capacity of up to 12,000 tons of waste per year, thus covering the total needs of the country's medical units (approximately 1,800 medical units around Greece). The plant contributes to securing public health, compliance with Greek and European environmental legislation, and environmental sustainability. Moreover, part of the generated thermal energy is reused by the plant in order to reduce the overall energy consumption.

- 3 Recycling Materials Sorting Centers (RMSC) with a total capacity of > 175,000 tons per year.
- The largest landfills in Greece with a capacity of > 100 mil. m³, including the Integrated Solid Waste Management (ISWM) plant in Fyli, which can manage 1,897,000 tons of municipal solid waste per year.

Through the practices applied in projects, high reuse and recycling rates are achieved, ensuring the value of natural resources, raw materials and products is maintained. Indicatively in 2020, the following were achieved:

- Exploitation of 30,400 m³ of treated effluent waste from the leachate treatment unit of the Integrated Solid Waste Management Plant (ISWMP) in West Macedonia. The treated waste was utilized to cover the plant's operational needs, such as cooling of the biological treatment unit, cleaning of the waste management units and irrigation purposes.
- Exploitation of produced biogas from landfills and generation of electricity (194 GWh), which is fed to the grid. HELECTOR is operating 4 biogas plants in Ano Liossia, in Tagarades, in Mavrorachi and in Jordan with a total capacity of 37.45 MW.
- Collection and recycling of “blue bin” waste (recyclable packaging materials) and selling of produced materials to raw material producers. The subsidiary company Solid Waste Recycling (ASA RECYCLE) that manages “blue bin” waste, recycled 63% of the total waste processed, which corresponds to 41,260 tons.
- Production of high-quality fertilizer (compost) from organic waste at the waste treatment plants. At the Mechanical Recycling and Composting Waste (MRCW) plant in Liosia, 30-50 tons/month of compost were produced, which were distributed in packages or in bulk, either commercially or free of charge, following requests of the Special Inter-collective Association of the Prefecture of Attica (EDSNA), which is the project owner. This specific compost meets the ecological criteria set by the Decision (EU) 2015/2099 for the award of the EU ecolabel for soil improvers.
- Production of 25,810 tons of SRF (solid recovered fuel) at the MRCW plant in Liosia, and 55,532 tons at the waste treatment plant in Osnabrück, Germany, for use as a secondary fuel in the cement industry.

- Collection and recycling of mixed waste and selling of produced materials to raw material producers/recyclers. In 2020, the Integrated Solid Waste Management (ISWM) plant of West Macedonia processed 103,916 tons of waste, out of which 16.74% were recovered. In the facility, a total of 30% of the incoming mixed waste from the Region of Western Macedonia as well as from Corfu, were either reused as compost for the facility's needs- (as coating material for the landfill), or as quarry restoration material, or sold as recyclable material.

- Recovery of recyclable materials, which were reused in various activities of the Environment segment. More specifically, in 2019, rock debris was recovered from the construction of Landfills, which after special treatment was used for the construction of new landfills and/or for the covering of waste.

At the same time, the Group's companies always collaborate with relevant licensed bodies and specialized associates for the collection, transport, treatment, recovery, reuse and/or disposal of their processed waste.

In 2020, the thermal energy from biomass generation project, of 30 MW of total capacity, in Amyntaio, was completed and subsequently put into trial operation. The specific plant is capable of supplying the existing district heating network, which serves the municipalities of Amyntaio, Filota and Levaia (see section **Contribution to greater availability and reliability of Renewable Energy Sources**). This project is the only biomass power plant in Greece and it is a very important challenge for the Group, since the shift towards circular economy at a national and international level is expected to further enhance interest in similar activities/projects. The project also covers a particularly important need of the local community regarding the provision of district heating services from alternative fuels, as the lignite plants in the area are shutting down, due to energy transition.

In August 2020, the operation of a modern plant for the recovery of electricity from biogas, with a total capacity of 3.52 MW was launched, in the Mavrorachi landfill site. The electricity generated is injected into the electricity distribution network.

Moreover, in 2020, two new waste management centres for the treatment of excavation, construction and demolition waste (ECDW) were launched, in the Regional Unit of Ioannina. The company HELLENIC QUARRIES aims through the operation of these two new centres to decrease and gradually eliminate uncontrolled waste disposal to vulnerable deposits, to increase the lifetime of waste disposal sites, and to exploit the plant's products, and residuals for the rehabilitation of inactive quarries.

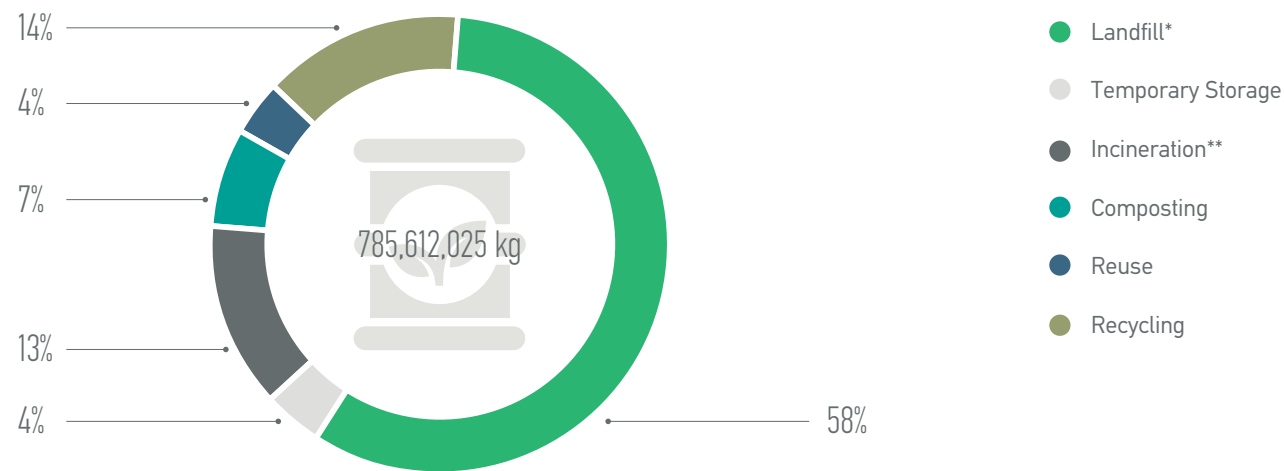
During the year, the two centres received a total amount

of 376 tons of excavation, construction and demolition waste (ECDW).

Management of Third-party Waste in 2020

In 2020, the waste treatment plants of the companies in the Environment segment managed 885,614 tons of third-party waste, of which 878,429 tons of non-hazardous waste (municipal waste) and 7,196 tons of hazardous waste (hospital waste).

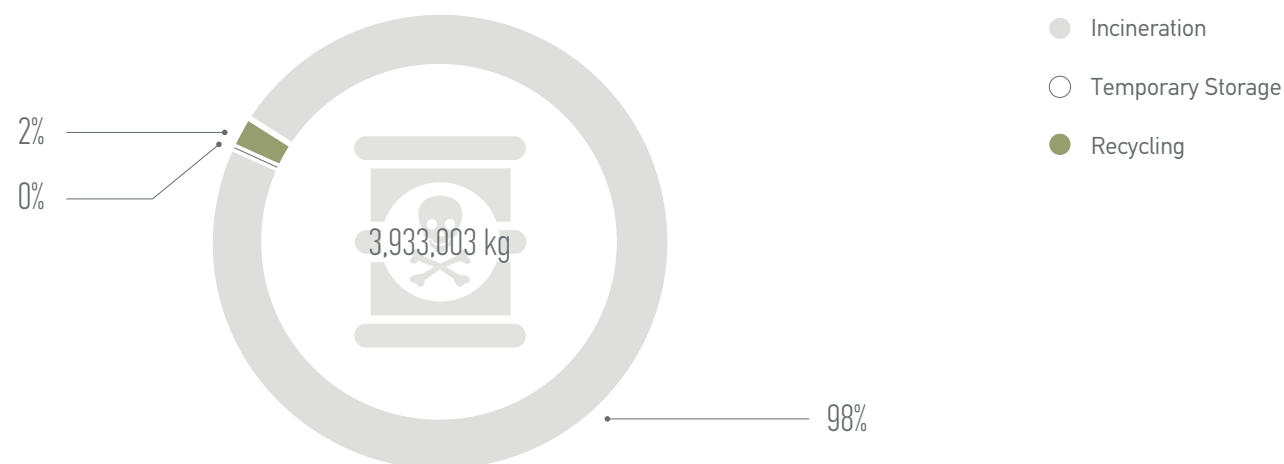
Treatment Methods of Non-Hazardous Waste



* STERILISATION treated 3,426 tons of hazardous waste using the sterilization method. In this process, 3,512 tons of inactivated non-hazardous waste were generated and sent to landfill sites. Consequently, they have been registered in the above diagram under the category of non-hazardous waste as a whole. The difference in quantity between input and output amounts is ascribed to the processing method.

** 99% of the waste was transported for incineration with energy recovery.

Treatment Methods of Hazardous Waste



Note: The difference in the total waste treated and the sum of waste per treatment method (hazardous and non-hazardous) is ascribed to the dehydration of the waste.

With respect to the transport of hazardous waste (e.g. hospital waste), the companies in the Environment segment are duly licensed and have undertaken the appropriate measures, ensuring the protection of public health and the environment. In 2020, 7,196 tons of hospital waste were transported.

In the field of Hazardous Medical Waste Management (HMWM), the Group manages through the HELECTOR S.A. – ARSI S.A. Joint Venture, the only Medical Waste Incineration Plant (MWIP) in Greece. The plant has been in operation since 2002 at the landfill site in Ano Liossia. In 2020, the plant treated 3,769 tons of hazardous waste from medical units (hospitals, clinics, microbiological labs, private hospitals, dental clinics, veterinary clinics and pharmaceutical warehouses), applying advanced technology and best available techniques.

In addition, the Group, through its subsidiary STERILISATION, manages the plant for the sterilisation of Purely Infectious Hazardous Waste (PIHW), storage of Mixed Hazardous Waste (MHW) and of Other Hazardous Waste (OHW) received from Medical Units at the 2nd Industrial Area of Volos. More specifically, in 2020, the plant treated

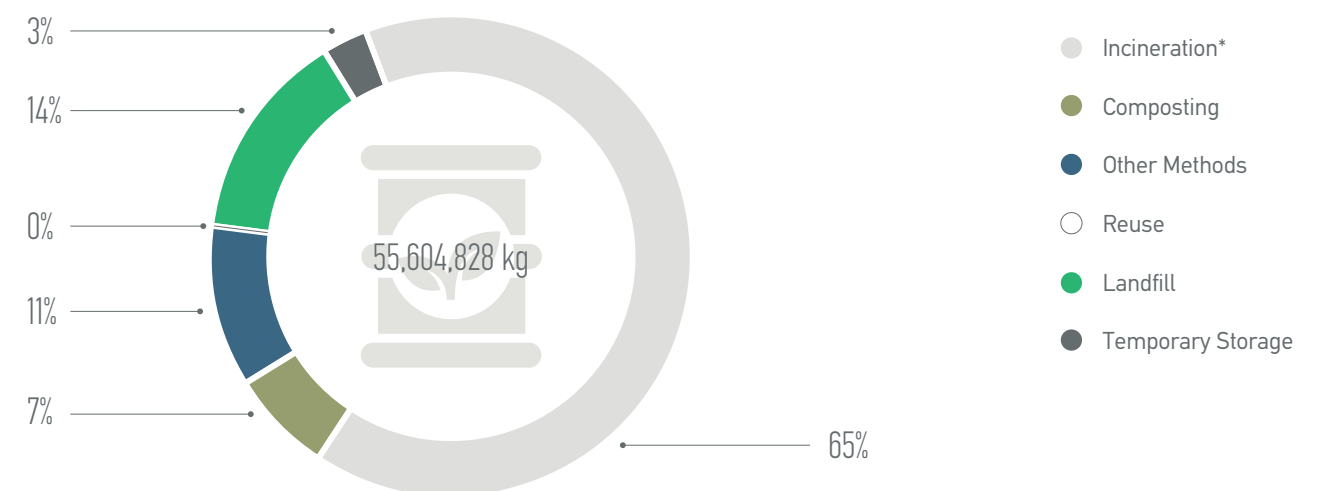
3,347 tons of hazardous waste by applying advanced methods and inactivation techniques.

Management of Wastewater Treatment Plants Waste in 2020

The Group is also operating in the construction, operation and maintenance of urban wastewater treatment plants. Among others, it is responsible for the operation and maintenance of the Psytalia Wastewater Treatment Plant, which is one the largest environmental projects in Greece, as it contributes vitally to the environmental protection of the area, while enhancing biodiversity in the ecosystem of the Saronic Gulf.

In 2020, the urban wastewater treatment plants, operated by Group companies, treated 317,139,617 m³ of wastewater. The diagram below shows the solid waste management methods of the waste generated by the operation and maintenance of the urban wastewater treatment plants or that were received for treatment at these plants.

Treatment Methods of Non-Hazardous Waste



* Waste is used as alternative fuels for energy recovery, replacing conventional fuels, in third-party facilities.

5.3 MANAGEMENT OF ENVIRONMENTAL FOOTPRINT

A main objective and priority of the Group is the effective management of the environmental impacts resulting from its operations. To ensure the protection of the environment and the natural resources, the Group employs all the requisite preventive measures and invests in reducing its environmental footprint.

Environmental Management

The Sustainable Development Division has the responsibility, amongst other things, to systematically monitor the Group companies environmental parameters of operation, to develop appropriate programmes that will lead in the improvement of the key segments' environmental performance, as well as to enhance the Group employees environmental awareness.

With the exception of the RES segment, the main companies of the Group's segments, which represent the 63% of the total turnover, implement certified environmental management systems (ISO 14001 and/or EMAS), through which the reduction of the environmental impact of their activity and the enablement of initiatives in respect to recycling, energy saving, water consumption, management of effluent waste and the protection of biodiversity are achieved. At the same time, the compliance of the Group's companies with respect to the relevant environmental legislation is ensured. In 2020, the company HELLENIC QUARRIES proceeded to the development of an Environmental Management System according to the ISO 14001 standard, which is expected to be certified within 2021.

The main companies of the Group, excluding the RES segment, have established an Environmental Management Department, which functionally reports to the Group's Sustainable Development Division, and is responsible for ensuring that each company conforms to the environmental management system.

The main impacts of the Group's companies relate to the consumption of resources (energy, water and materials), the emission of air pollutants and the generation of liquid and solid waste. In all projects and activities, from the construction to the rehabilitation phase, the Group focuses on protecting the environment and minimising the impacts of its activities on it. Based on the activities of each company and individual projects, environmental impacts are identified and appropriate action plans or alternative environmental management programmes are developed.

To minimise the environmental impacts stemming from its activities, the Group focuses on:

- Applying increasingly environmentally friendly technologies.
- Managing energy consumption, ensuring rational energy use and efficiency through specific initiatives and monitoring of consumption.
- Monitoring air pollutants.
- Decreasing the amount of waste produced, through reuse and recycling.
- Decreasing water consumption and increasing its reuse, where possible.
- Avoiding water pollution and implementing strict precautionary measures.
- Managing hazardous waste, according to relevant legislation and in cooperation with licensed collection/transportation companies.
- Monitoring noise, vibrations and other nuisances, in order to reduce impacts on society, traffic, utility networks and protected areas.
- Complying with the environmental legislation in force and conducting regular audits.
- Protecting ancient artifacts and monuments of cultural heritage.
- Restoring green spaces and the projects' landscapes based on the approved environmental terms.
- Rational management of raw materials and natural resources.
- Monitoring avifauna, where required, and implementing measures for the protection of biodiversity.
- Informing and training employees on environmental - energy issues in the workplace and the impact that the companies' operations have on the environment and society in general.

In 2020, emphasis was given on improving internal organisation on environmental and energy management issues, on a more effective monitoring of performance, and on strengthening of internal audits. Alongside, Environmental and Energy Management Officers were appointed in all projects and activities of the Group.

Furthermore, a single tool was created to record the environmental performance of the Group's projects and activities and training was provided to those responsible for its use and completion. In cooperation with the Information Technology Division, the development of an online platform is in progress. Managers will enter the platform based on their project/activity and will upload monthly/annual performance data. The platform will enable the automated extraction of results and performance indicators on a company and on a Group level as a whole. This will significantly improve the process of collecting, analysing and comparing performance data.

Finally, internal audits were strengthened and intensified to ensure the proper implementation of procedures and work instructions in the Group's projects and activities. In 2020, internal audits on environmental and energy management issues were carried out in 29%² of the Group's on-going projects and activities. In total, 48 incidents of non-compliance were identified. The implementation of the corrective actions agreed with the Group's projects and activities is in progress.

²Ongoing projects incorporate the companies, projects and plants of the Group that were active in 2020, including projects completed during the year.

AKTOR: Continuous efforts for improvement of environmental management



CASE STUDY

Specifically, in 2020:

- Environment and Energy Officers were appointed to the company's projects, who were then trained in their new duties.
- A project self-assessment tool was created that incorporates the key requirements of the company's environmental management system, with an emphasis on compliance with legislation, so that any deviations can be identified remotely and corrective actions can be carried out accordingly.

- A new tool was created to record incidents of misconduct during internal audits and track their remediation.
- A monthly report was created to be submitted to the company's Management with key environmental performance indicators.
- Internal audits have increased by 61%, despite the pandemic-related restrictions.
- Environmental performance in 100% of the company's active projects has been recorded.

Energy Consumption

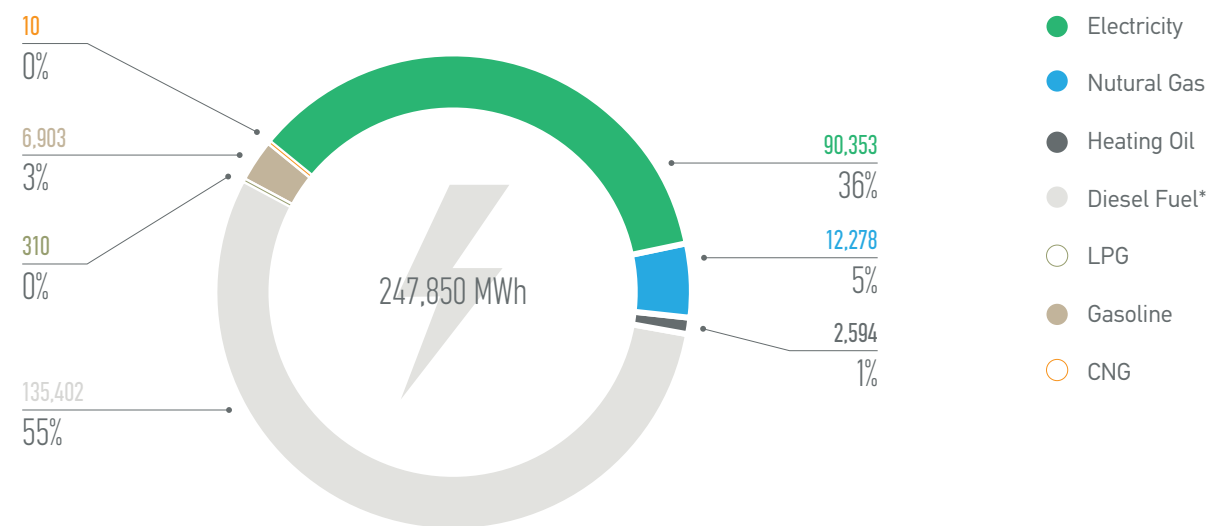
Throughout the entirety of the Group's activities, efforts are made to rationally manage all forms of energy consumption and protect natural resources. Energy consumption is monitored both at the Group's Head Offices as well as at the facilities of the Group's companies. In addition, AKTOR, AKTOR FM, ATTIKES DIADROMES, ATTIKI ODOS and MOREAS implement certified Energy Management Systems in accordance with the ISO 50001 standard.

The energy management systems of the Group's

companies were revised in 2020 to comply with the new ISO 50001:2018 standard; the transition to this standard was certified by an external body.

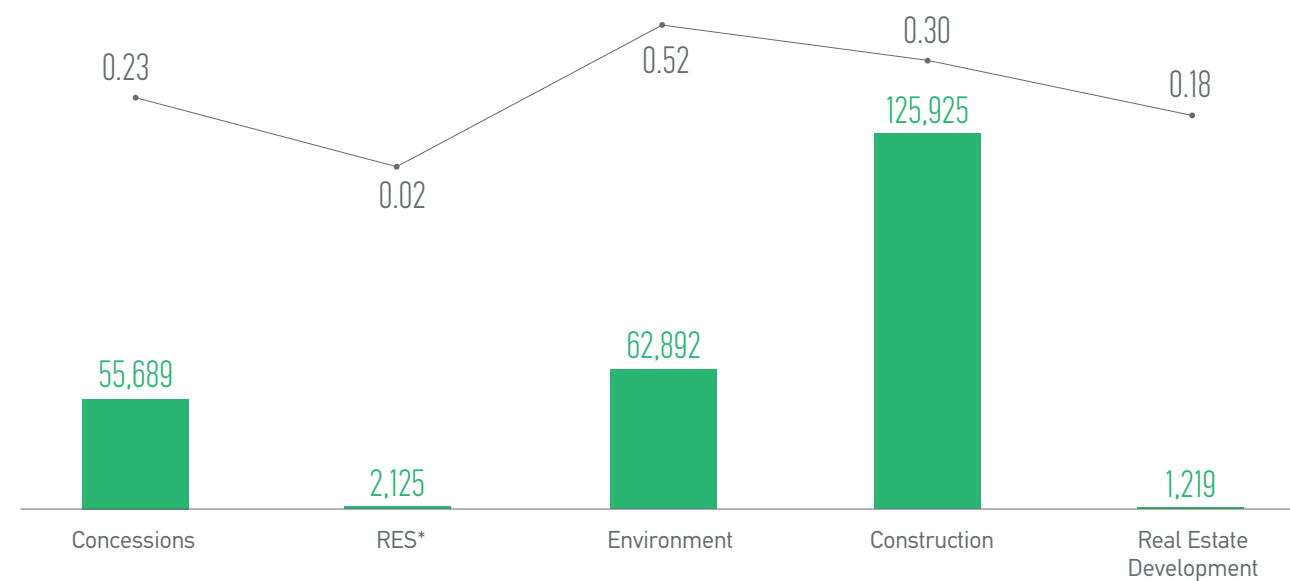
In 2020, the Group's total energy consumption amounted to 247,850 MWh (892 TJ). The largest share of energy consumed resulted from diesel consumption (38%), which is mainly used for the operation of the work-sites' machinery (excavators, loaders, trucks etc.), as well as electricity (36%). At the Head Offices, energy consumption amounted to 0.226 MWh/m², showing a decrease of 2.6% compared to 2019.

Energy Consumption (MWh)



* The consumption of diesel fuel relates to the use of Heavy Duty Vehicles, such as excavators, loaders, trucks (69%), the use of company vehicles (22%) and the use of plant machinery (9%).

Energy Consumption per Segment



● Total Energy Consumption per Segment (MWh)

→ Energy Consumption per turnover (kWh/€)

* The data regarding the parent company ELLAKTOR has been included in the RES segment.

In 2020, targeted initiatives/actions were implemented to reduce energy consumption. Indicatively, in 2020, the Equipment Management Department issued new guidelines for

the proper use and consumption of energy, proceeded with the appropriate training of employees and achieved a 21.3% reduction in electricity consumption compared to the previous year.

MOREAS: Initiatives to reduce energy consumption



CASE STUDY

In November 2020, an energy saving initiative was implemented at the Veligostis Toll Station, which is used by the Police, with the installation and operation of a heat pump. The estimated energy savings are expected to be approximately 30 MWh/year.

In addition, in December of the same year, older technology open road lights were replaced with new technology LED lights, on a 6 km long motorway section. This upgrade, is expected to create energy savings of 80% (500 MWh/year).

In November 2020, an energy saving initiative was implemented in the Fire Brigade building of CMC Nestani, with the installation and operation of a heating pump, which facilitated its energy autonomy from CMC Nestani. The estimated energy savings are expected to be approximately 30 MWh/year. Finally, during the year, about 50 lights were replaced in various buildings. This action is estimated to bring a 30% (2.6 MWh/year) reduction in energy consumption.

In regard to the RES segment, the amount of energy consumed derives from the activity of the company's Head Offices and the consumption of diesel for employees' company vehicles.

In regard to the Environment segment, recognising that the production process of the waste treatment plants is significantly energy intensive, the Group allocated great importance to the management of its energy needs and continuously evaluates possible improvement opportunities with respect to its energy performance, implementing the appropriate actions³.

³ The specific actions mostly concern the companies STERILISATIONS S.A., APOTEFROTIRAS S.A., EDADYM Single Member S.A., BEAL S.A.

- Installing Management and Automated Test Systems at its plants.
- Installing a Power Management System.
- Installing an advanced Distributed Control System – CMDA.
- Implementing a programme for equipment Maintenance and Inspection.
- Implementing emergency systems for maintenance works and possible disruptions in the operating system.

Environment segment: Monitoring energy indicators



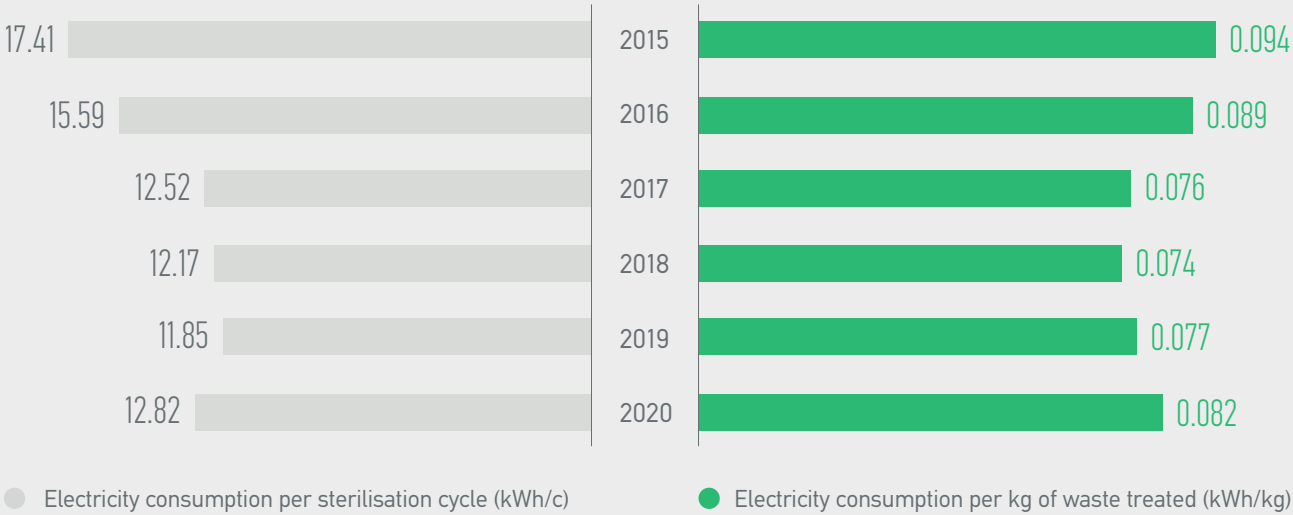
CASE STUDY

The companies of the Environment segment have been monitoring specific performance indicators over time (e.g. energy consumption per kilo of waste treated, energy consumption per sterilisation cycle, etc.), striving for continuous improvement.

In 2020, due to the COVID-19 pandemic, there was an increased demand in the medical waste treatment plants.

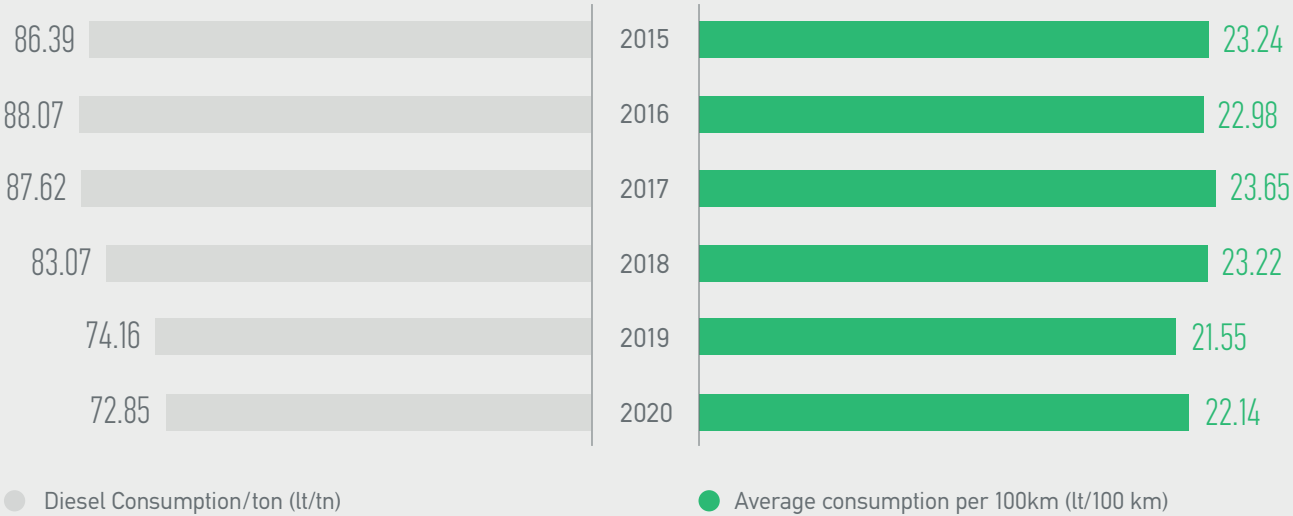
More specifically, STERILISATION S.A. and APOTEFROTIRAS S.A. plants faced an increase in the amount of waste they were required to process to meet the needs of health-care and hospital units. At the same time, the STERILISATION plant fully utilised the new cooling vestibules, which contributed to the increase in energy consumption for 2020.

Progress of energy indicators for STERILISATION S.A.



At the same time, holistic IT and Telematic Management systems are used to increase the reliability of the hazardous waste collection and transport system. Through these systems, an improvement in the management of employees and vehicle fleet was accomplished, the monitoring of the route of infectious hazardous waste from medical units was improved and a minimisation of the specific activity's environmental/energy footprint was achieved. Based on the specific systems the indicators for diesel consumption per ton collected and the average consumption per 100km, are depicted in the following diagram.

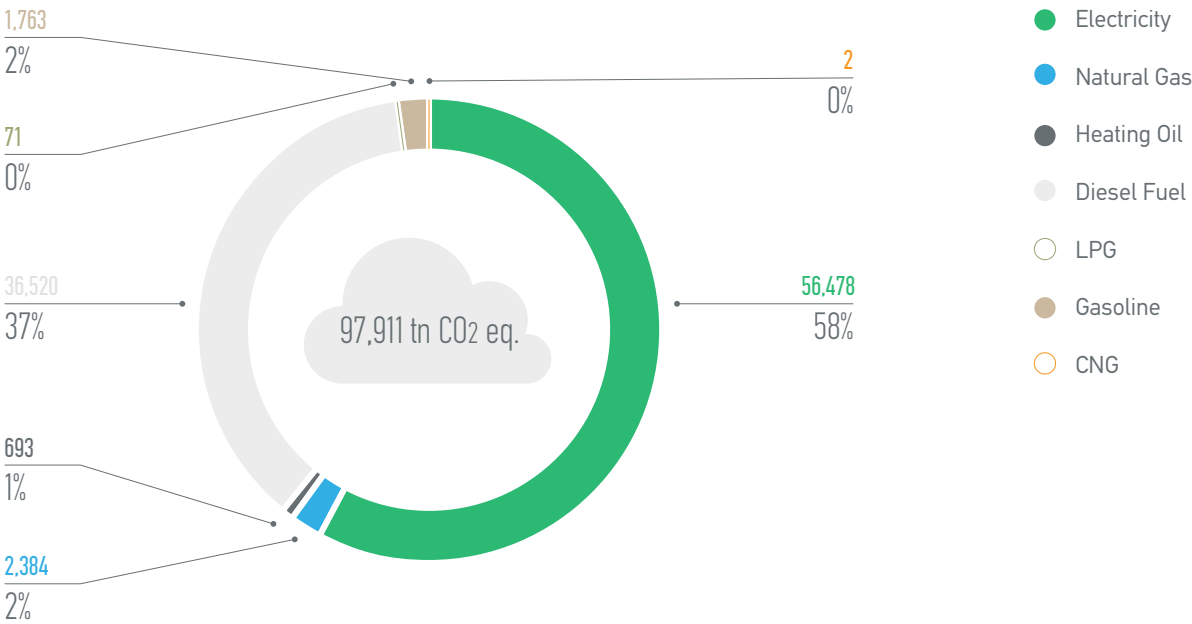
The increase observed in the average consumption per 100 km is due to the fact that in 2020, new and more demanding routes were added for STERILISATION S.A. (serving remote sites using mountain routes instead of highways), while there was an increase in the average load carried and the total number of routes. In addition, larger vehicles that have greater fuel consumption were used to meet the escalating demand for the collection and transport of waste from medical units, while one more vehicle was added to the company's fleet.



In 2020, the Group's Greenhouse Gas Emissions amounted to 97,911 tn CO2 eq., of which 58% (56,478 tn CO2 eq.) resulted from electricity consumption (indirect emissions –

scope 2) and the remaining 42% (41,433 tn CO2 eq.) resulted from the consumption of natural gas, heating oil, diesel fuel, gasoline, LPG and CNG (direct emissions – scope 1).

GHG Emissions Scope 1 & 2 (tn CO2 eq.)



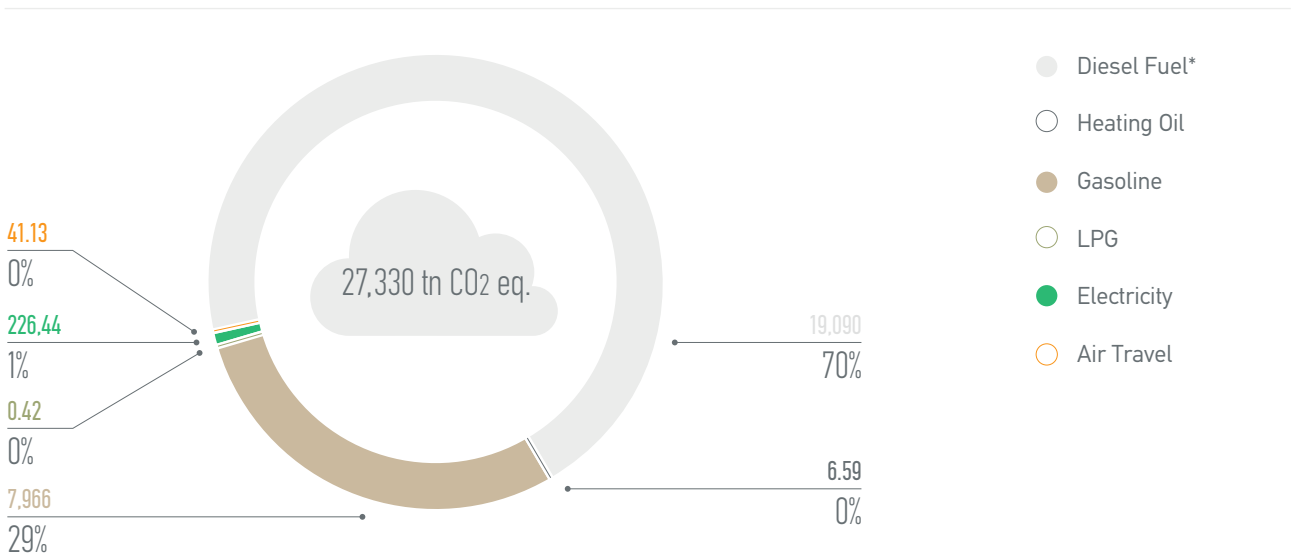
The emission factors from the National GHG Inventory Report 1990-2018 were used to calculate the CO2 emissions from natural gas consumption, heating oil, diesel for plant machinery, diesel fuel, petrol for plant machinery, gasoline and LPG. The emission factors from IPCC Guidelines for National Greenhouse Gas Inventories 2006 were used to calculate the emissions from CNG consumption. The CO2 emissions from the consumption of electricity are calculated based on the data included in the annual national report for 2020, submitted to the United Nations Framework Convention on Climate Change (UNFCCC).

For the conversion of CH4 and N2O emissions to tons of CO2 eq, the 100-year time horizon Global Warming Potential values that are included in the Decision 24/CP.19 of the Conference of the Parties of the UN Framework Convention on Climate Change (UNFCCC), were used.

Lastly, the Group proceeded with the calculation of the remaining air pollutants (NOx, SOx, VOC, PM10), which resulted from direct energy consumption (natural gas, diesel for heating, diesel fuel, gasoline and LPG). The emission factors from the EMEP/EEA Air Pollutant Emissions Inventory Guidebook 2013, as well as from national directives (for SOx), were used for the calculations.

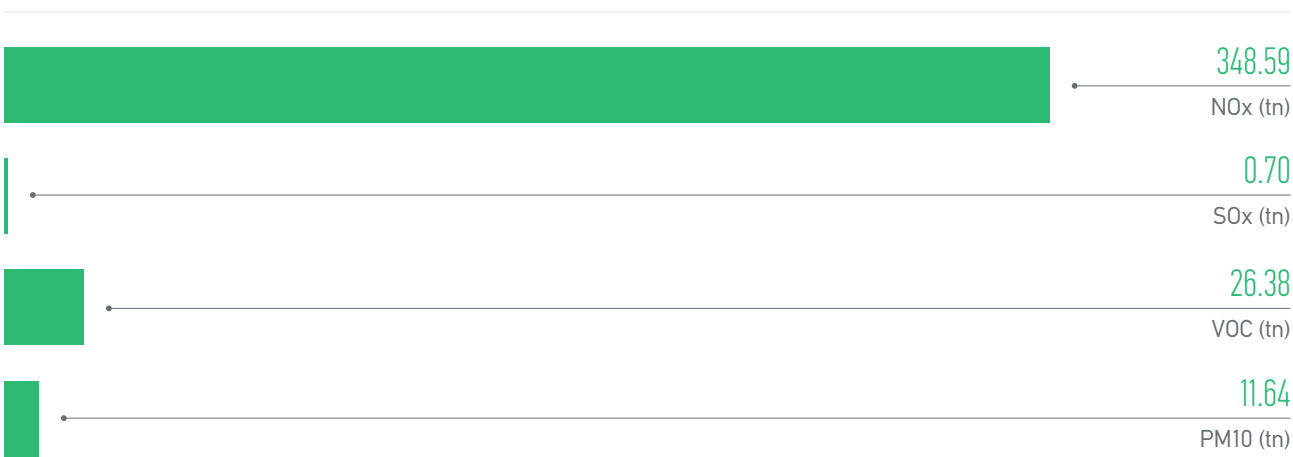
In 2020, to better reflect its overall environmental footprint, the Group recorded and calculated the indirect emissions (scope 3) resulting from the energy consumption of sub-contractors involved in its projects and activities, as well as from the business air-travel of employees (excluding air travel in the Construction segment), as shown in the diagram below.

GHG Emissions Scope 3 (tn CO₂ eq.)



* The consumption of diesel fuel (99%) relates to the use of Heavy Duty Vehicles (excavators, loaders, trucks, etc.)

Other Pollutant Emissions



Air Pollutants

The main responsibility of the Group's Environment segment is to ensure the air quality of its premises and

the surrounding areas. In that context, it implements the best-available combustion techniques and continuous inspections, with the aim to minimise air emissions.

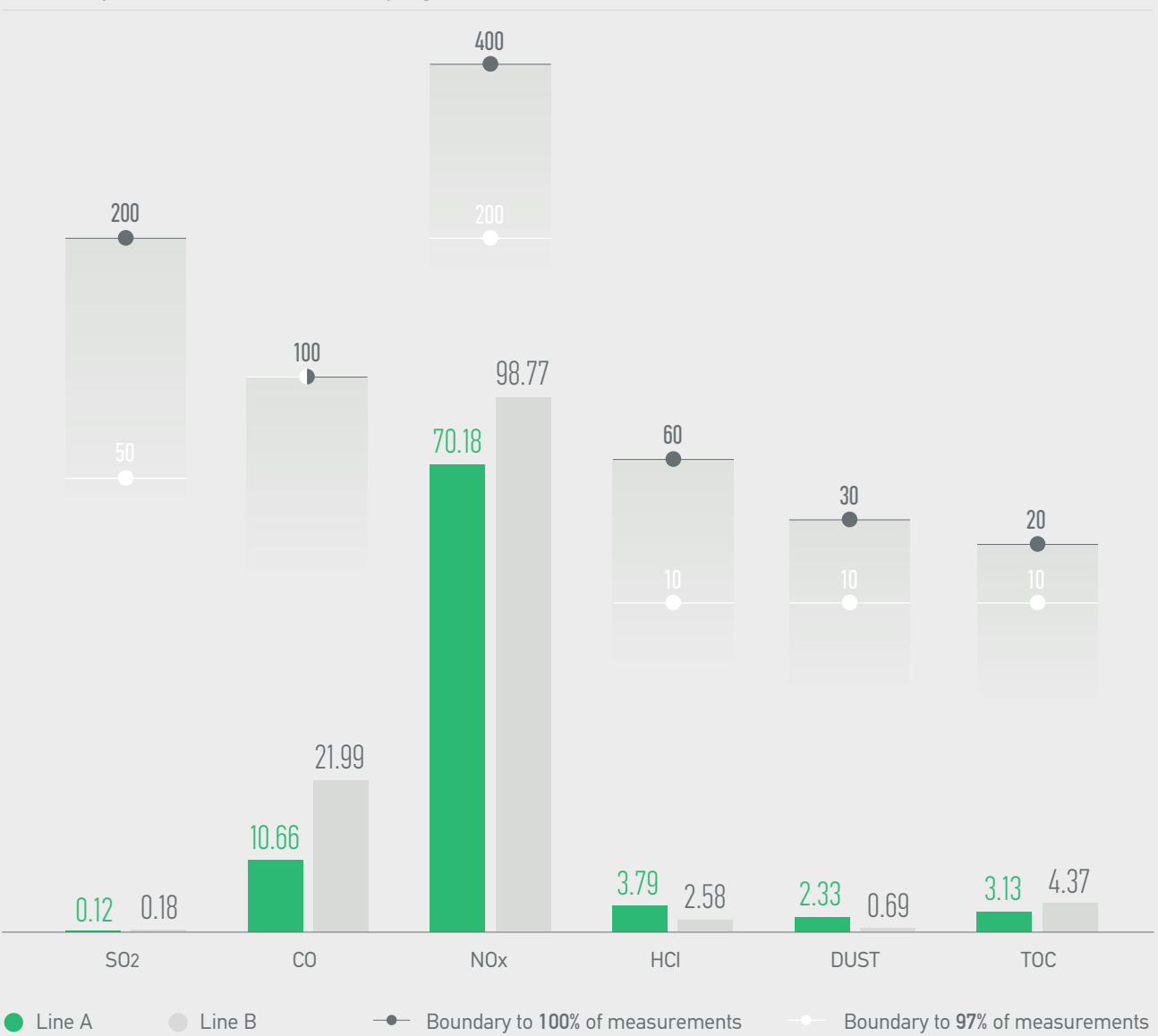
HELECTOR: Monitoring the air emissions from the hospital waste incineration facility at Ano Liossia



HELECTOR implements a plan for monitoring the air emissions from the hospital waste incineration facility at Ano Liossia, in accordance with the requirements of the relevant legislation. The main objective is the technical assessment of the combustion parameters' performance, as well as the continuous and lawful operation of the incineration facility. The plan concerns the online analytical systems for monitoring parameters and air emissions and the periodic monitoring of air emissions concentrations carried out by certified external laboratories.

Air emissions are monitored via state-of-the-art measurement equipment. The measurement programme monitors both point emissions, as well as fugitive emissions on a continuous and periodic basis. Analysts have access to the plant's Data Collection System (DCS), which allows them to fully monitor the units' operation, with the aim to minimise air pollution.

Annual average emission measurements (mg/Nm³) per 30 minutes in two parallel incineration lines, A and B for 2020, compared to relevant limits set by legislation (control limits at 100% and 97% of the measurements)

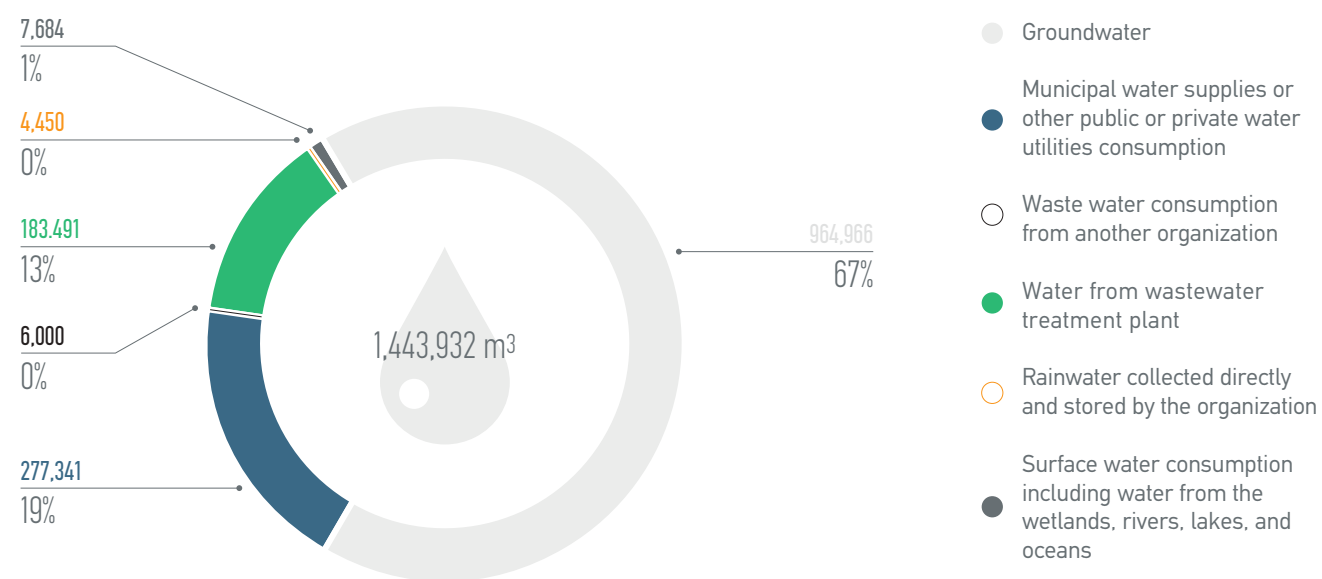


Water Consumption and Effluent Management

The amount of water consumed from the Group's companies mainly concerns hygiene purposes, irrigation, cleaning

(road and/or vehicles), waste treatment, etc. The Group's total water consumption for 2020 amounted to 1,444 thousand m³, of which 13% came from recycled water. At the Head Offices, water consumption amounted to 0.345 m³/m².

Water Consumption (m³)



The 67% of water consumed by the Group, derives from groundwater. In order to save as much water as possible, the companies carefully manage irrigated water from well drilling and/or wastewater treatment plants. The irrigation is controlled from the central electronic systems that are programmed depending on the climate conditions, in order to avoid wasting water resources. In addition, quality, chemical and microbiological analyses are carried out regularly to monitor the water's quality. In 2020, ATTIKES DIADROMES and ATTIKI ODOS showed a reduction in the total amount of water consumption by 6% compared to 2019.

Respectively, in the Environment segment, HELECTOR implements consistent and long-term measures that focus on the conservation and rational use of water at its Waste Treatment Plants. More specifically, it treats the leachates that are generated from its operation through its Leachate and Effluents Treatment Plants and reuses them for the

biological treatment of waste and/or for the irrigation of its facilities.

In the Construction segment, and more specifically in AKTOR's construction-sites, appropriate measures are implemented to reduce water consumption, which include:

- Reuse of water for cleaning machinery and water spraying purposes at the construction sites.
- Rainwater collection for exploitation in specific projects (e.g. in the Hilarion Hydroelectric Dam, the rainwater collected is used for the WC of the construction site).
- Installation of specific guidelines in employee areas (toilets, kitchens, etc.) that outline best practices and instructions for employees to avoid wasting water.

In the Real Estate Development segment and particularly at the commercial park "Smart park", the treated municipal wastewater, that is generated from its operation, is utilised through the installed wastewater treatment plant, for the irrigation of the park's communal green spaces, via an underground pipeline network. In all areas of the park that are irrigated with treated water, signs have been placed that state in Greek and English that the water is not potable.

In the Construction segment and with the aim of minimising water pollution in the construction sites, wastewater management is carried out in accordance with the relevant legislation and the Environmental Terms Approval Decisions (ETAD), whereas the chemical analysis of water effluents is conducted at regular intervals, where required. In the projects where there is a repair shop for vehicles, effluents from the vehicle service ramp are collected and treated in line with the Standard Environmental Commitments (SEC) or the project's ETAD, and are then reused for water-spraying purposes or passed on for final-use. In addition, in the concrete batching plants, suitable slopes and ramps have been developed in order to direct effluents into sediment tanks so as for the the liquid waste to be reused according to the project's environmental permit.

For the activities in the Environment segment, liquid waste that is generated from the companies' different processes is separated into industrial wastewater and sewage. Due to the industrial wastewater and sewage's different pollution load, different treatment techniques are used prior to their provision to the end-user, in accordance with the facilities' ETAD. At the same time, frequent quality analyses are carried out on the liquid waste, that is generated from the waste treatment plants (Landfills, Recycling Materials Sorting Centres, Waste Treatment Plants, etc.).

Solid Waste Management

The Group's waste management policy primarily seeks to reduce the amount of waste generated and any associated risks, to optimise waste recycling and reuse and finally to ensure its appropriate disposal.

The management of waste is carried out, based on the requirements of the national and European legislation, as outlined in the Environmental Terms Approval Decisions (ETAD), as well as any other requirement based on the specificity of the project or activity.



The collection, transport and disposal of waste is carried out by licensed bodies (subcontractors), which are registered in the Electronic Waste Registry (EWR) of the Ministry of Environment and Energy.

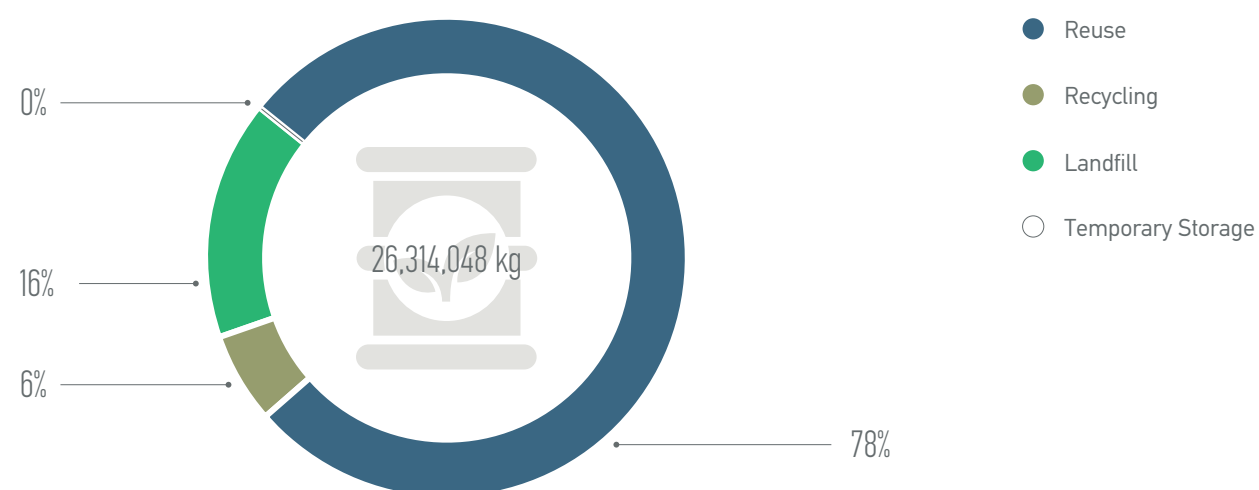
At the Head Offices, the Group implements recycling programmes, which include office waste (paper, toner, plastic, etc.), electrical and electronic equipment waste (computers, monitors, etc.), home batteries, UPS and generating sets batteries, as well as lubricant waste.

The companies in the Concessions segment, recycle all types of waste generated from the operation of motorways (lubricant waste, accumulators, spare parts / metals, garden waste, etc.).

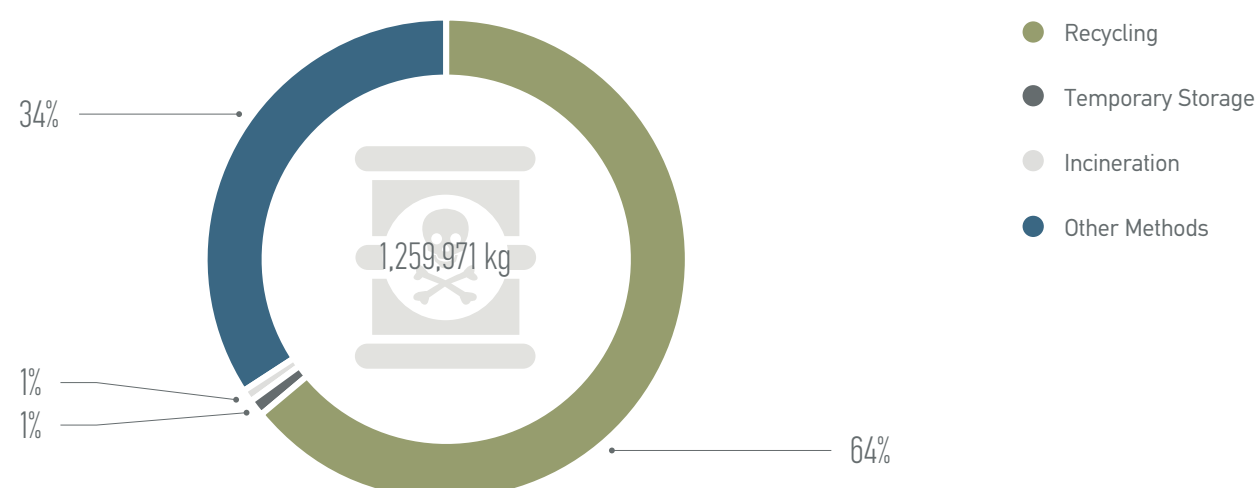
Out of the total amount of waste (hazardous and non-hazardous) generated from facilities/projects owned or leased by Group, such as the Head Offices, the activities of the Concessions and RES segments, and the Mechanical Equipment Warehouse, 74% was reused on site, 8% was recycled, 16% ended up in landfill sites and the remaining 2% was processed by other methods.

WASTE GENERATED BY GROUP'S OPERATION

Management of Non-Hazardous Waste



Management of Hazardous Waste



Non-Hazardous waste generated by the Group

Non-hazardous waste category (kg)	Management Methods				Total
	Reuse	Recycling	Landfill	Temporary Storage	
Paper	-	91,338	-	-	91,338
Scrap metal	-	1,219,148	-	-	1,219,148
Glass	-	4,123	-	-	4,123
Plastic packaging	-	4,631	-	-	4,631
Plastic	-	4,540	-	-	4,540
Fabrics	-	425	-	-	425
Tyres	-	1,190	-	1,800	2,990
Metal (aluminium)	-	244	-	-	244
Cables	-	450	-	-	450
Mixed packaging	-	7,740	-	-	7,740
Mixed municipal waste	-	43,260	59,029	-	102,289
Excavations	20,519,100	-	-	-	20,519,100
Demolitions	-	27,900	-	-	27,900
Wood packaging	20	-	-	10	30
Pallets	200	-	20	80	300
Biodegradable waste	-	44,800	-	-	44,800
Sludge	-	-	4,284,000	-	4,284,000
Total	20,519,320	1,449,789	4,343,049	1,890	26,314,048

Note: The data above does not include 1,186 kg of biodegradable waste which was transported for composting, 1,557 kg of animal by-products which were transported for combustion, as well as 15,060 kg of mixed domestic waste which was handled by different processing methods. In addition, it should be noted that municipal waste disposed in municipal bins is not included in the above mentioned quantities.

Hazardous waste generated by the Group

Hazardous Waste Category (kg)	Management Methods				Total
	Recycling	Temporary Storage	Incineration	Λοιπές Μέθοδοι	
Used mineral oils	119,115	5,354	-	-	124,469
Accumulators	17,364	1,000	-	-	18,364
Electrical and electronic waste	5,000	2,230	-	-	7,230
Light bulbs	1,002	5	-	-	1,007
Small batteries	1,299	1,460	-	-	2,759
Contaminated packaging	11,813	4,035	4,790	-	20,638
Toner	314	40	-	-	354
Solvents	90	160	-	616	866
Absorbent materials	3,646	2,680	2,402	332	9,060
Oil filters	1,224	1,550	2,291	171	5,236
Laboratory waste	10	-	-	-	10
Air filters	124	-	-	-	124
Refrigerants	979	-	-	-	979
Pesticides	-	-	1,669	-	1,669
Bottom ash	630,420	-	-	-	630,420
Fly ash	-	-	-	425,320	425,320
Insulation bricks and castable	8,280	-	-	-	8,280
Other filters	-	-	165	-	165
Other hazardous waste	3,021	-	-	-	3,021
Total	803,701	18,514	11,317	426,439	1,259,971

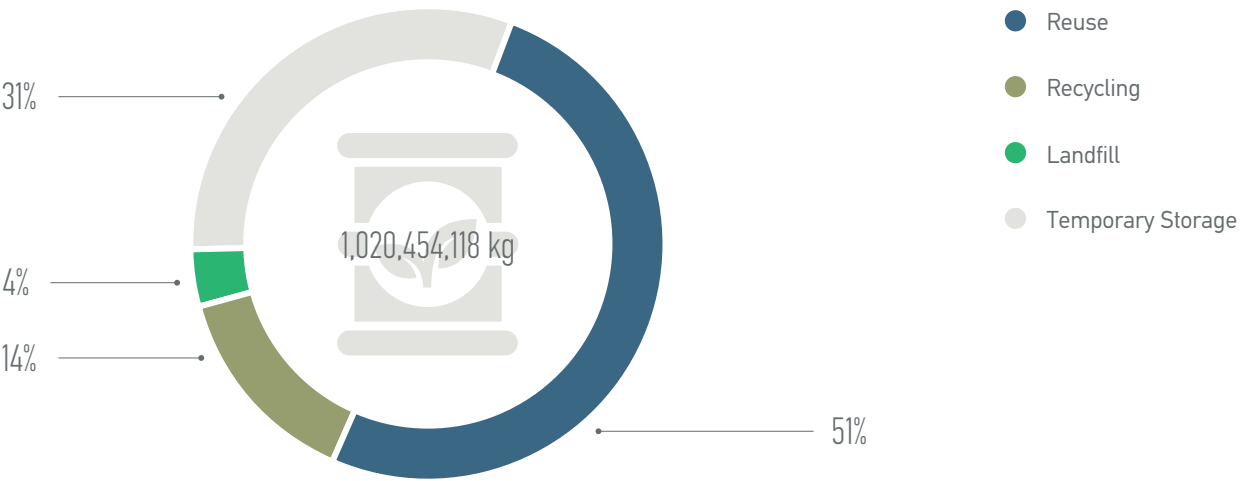
Note: The data above does not include 1,000 kg accumulators, 493 kg of contaminated packaging and 767 kg of fat and oils, which were transported for reuse. The values in the “Other Methods” category, mainly refers to fly ash resulting from the incineration of hazardous medical waste, which is handled by a hazardous waste management company for inactivation (through physical-chemical treatment). Post-treatment waste is transported abroad, to be discharged in hazardous waste landfills.

Further to the waste resulting from the operation of its companies, the Group also manages large quantities of waste, generated during projects, on behalf of third parties (e.g. construction projects).

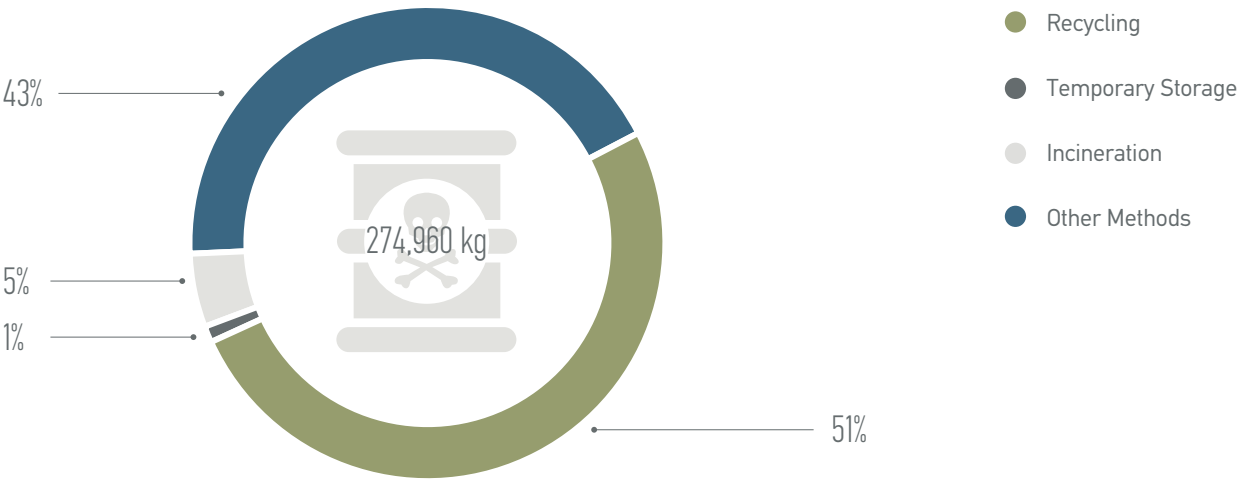
Out of the total amount of waste (hazardous and non-hazardous) managed by the Group or its subcontractors on behalf of third parties, 51% was reused on site, 14% was recycled, 32% was temporarily stored and the remaining 4% was transported to landfill sites.

WASTE MANAGED BY THE GROUP'S COMPANIES AND SUBCONTRACTORS

Management of Non-Hazardous Waste



Management of Hazardous Waste



Non-hazardous Waste managed by the Group's companies and subcontractors

Non-hazardous Waste Category (kg)	Management Methods				Total
	Reuse	Recycling	Landfill	Temporary Storage	
Paper	8	38,383	305	-	38,696
Scrap metal	-	923,722	-	40	923,762
Glass	-	2,015	30	-	2,045
Plastic packaging	-	37,815	90	-	37,905
Tyres	-	20,230	13,750	9,500	43,480
Metal (aluminium)	-	290	-	-	290
Mixed packaging	-	69,536	-	-	69,536
Mixed municipal waste	-	1,267,796	4,425,634	-	5,693,430
Excavations waste	474,302,352	90,064,475	33,443,154	321,609,652	919,419,633
Demolitions waste	45,410,200	48,384,146	-	-	93,794,346
Wood packaging	-	229,150	-	-	229,150
Pallets	120,740	660	-	5,915	127,315
Pallet tanks	6,560	-	-	300	6,860
Ceramics	-	67,670	-	-	67,670
Total	519,839,860	141,105,888	37,882,963	321,625,407	1,020,454,118

Note: The data above does not include 275 kg of pallet tanks, as well as 1,196 kg of mixed municipal waste which were treated by different processing methods. In addition, it should be noted that municipal waste disposed in municipal collection bins is not included in the above quantities.

Hazardous Waste managed by the Group's companies and subcontractors

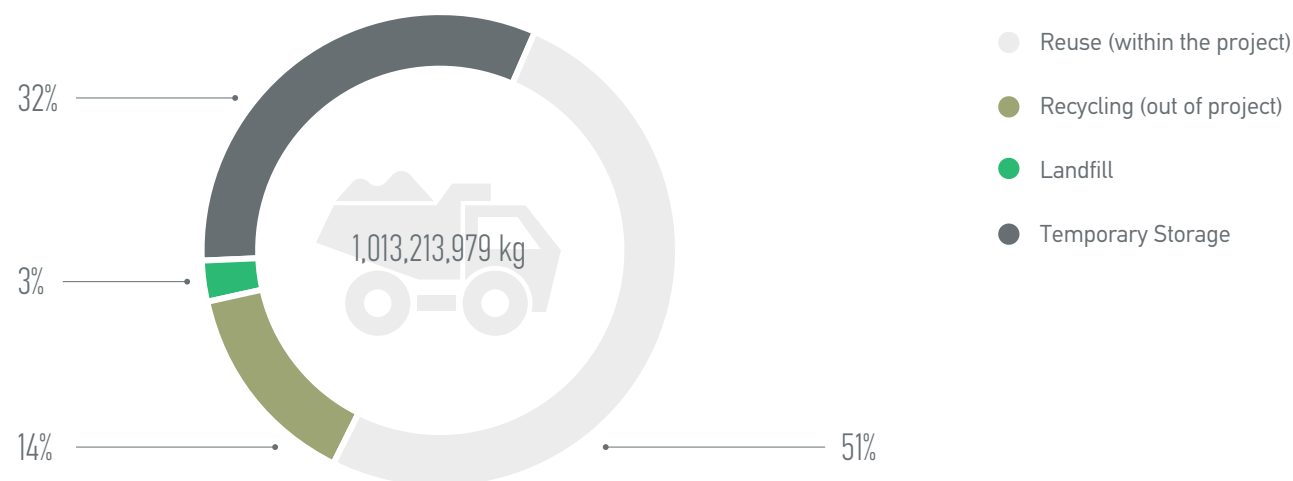
Hazardous Waste Category (kg)	Management Methods				Total
	Recycling	Temporary Storage	Incineration	Other methods	
Used mineral oils	109,831	2,085	-	-	111,916
Accumulators	5,464	1,200	-	-	6,664
Electrical and electronic waste	5,118	-	-	-	5,118
Light bulbs	965	41	-	-	1,006
Small batteries	4,813	329	-	-	5,142
Contaminated packaging	1,730	9	-	-	1,739
Toner	849	27	-	-	876
Absorbent materials	-	5	-	-	5
Oil filters	4,374	107	-	-	4,481
Fat and oils	240	-	9,106	-	9,346
Medical waste	147	-	52	-	199
Laboratory waste	-	274	287	40	601
Inorganic chemical waste	2,420	40	3,460	42,774	48,694
Refrigerants	1,490	-	-	-	1,490
Other hazardous waste	1,620	-	-	76,063	77,683
Total	139,061	4,117	12,905	118,877	274,960

The management of special waste, such as electrical and electronic waste, accumulators, used tyres, etc., is carried out through approved alternative management systems.

At the construction sites, a comprehensive management process of hazardous and non-hazardous waste is adopted in accordance with the environmental management systems. The majority of waste is utilised and not disposed.

Specifically, the excavation products are integrated into the project or used in the restoration of the affected areas and landscapes. The management of demolition materials is similar, with the demolition phases being scheduled by taking into account the building materials and their potential utilisation. In 2020, 51% of excavation, construction and demolition waste was reused within the projects.

Management of Excavation and Demolition Waste



Any hazardous waste that stems from construction activities is temporarily stored at working sites in specially designed spaces (sheltered spaces with impermeable surface and surrounding safety guardrails), until their scheduled collection from a licensed subcontractor.

Respectively, in Morea motorway, maintenance, planting, and irrigation works were carried out on the central islet of the motorway, with a total length of 150 km, and on the supports and branches of the motorway flyovers, with a total length of 500 km.

In regard to the protection of the local fauna, a special fence was installed to protect wild or stray animals from getting into the motorways. In addition, with the instalment of special stickers in accordance with international standards, incoming birds are prevented from hitting the glass noise barriers. ATTIKI ODOS and ATTIKES DIADROMES collaborate with the Wild Life Conservation Society (ANIMA) in Greece, to help with the aid of wild animals and birds that may cross the motorway. In addition, MOREAS has established a long-term partnership with the "Hellenic Animal Welfare Company", with the main purpose to support the organisation in the collection and protection of stray and abandoned animals, the nursing of injured animals, as well as with the neutering and their adoption of the animals.

RES Segment

For each wind farm there is an environmental management plan, which is applied both during its construction and its operation. Moreover, for all wind farm construction projects, the implementation of reforestation of similar-sized areas or forestry projects of equal value is anticipated.

Specifically, in 2020, in the context of wind farm construction, the following projects were implemented, which were included in the approval of the respective environmental terms and the respective informative actions of the competent forestry offices:

- In the Region of Epirus, the reforestation of 150,000 m², the reconstruction and improvement of around 3 km of forest roads, as well as redevelopment projects in the city forests of Ioannina were implemented, in parallel with the construction of the Kasidiaris 1 and Kasidiaris 2 wind farms.
- In the Region of East Macedonia-Thrace, the reforestation of 40,000 m² as well as the opening of 4 km of forest roads were implemented, in parallel with the construction of the Orfeas-Eptadendros wind farm.

Aiming to reduce the environmental impacts from the wind farms' construction and operation and taking into account that some of the Group's RES projects are situated within Natura 2000 areas, in Special Protection Areas (SPA) or in Special Areas of Conservation (SAC), or near areas with important bird fauna, the Group proceeds, where possible, to modify the park's initial design, as follows:

- Decrease in the number of wind turbines (W/T) included in the wind farm's initial design, resulting in fewer implications on the natural habitat.
- All medium voltage cables are set underground, and where possible, all high voltage ones as well.
- Use of new methods for the transport of large wind turbine units, with the aim to reduce large road work constructions (opening and expansion of forest roads) in forest areas.
- Suspension of wind turbines, when they are likely to cause problems in avifauna (e.g. the Orfeas – Eptadendros wind farm), until safe conclusions can be drawn on their effects on avifauna.
- Instalment of bird strike prevention systems.

At the same time, a bird monitoring programme is implemented in significant biodiversity areas (i.e. Natura) during all phases of the projects' construction (construction preparation, construction and operation). In all projects where

a bird monitoring programme is in place, annual reports are submitted to the competent authorities for evaluation.

Indicatively, following the completion of the Orfeas-Eptadendros wind farm in Thrace, located at a boundary of significance for birds (GR005), a DTBird monitoring and strike prevention system was installed in all wind turbines. The system detects the birds from a distance depending on their size and records their movements on video, which is then stored in the systems database. When the bird enters the predetermined beam, the system emits a warning noise alert and a second louder alert, if the bird continues on the same flight path. Assessing the hazard, the system will discontinue the wind turbine's operation and restart it once the bird is at an appropriate distance from the wind turbine (stop control module). The flight detection rates are high (>80%) as is the effectiveness of its actions.

All of the above measures taken for the redesign of wind farms and reduction of environmental impacts are part of the Group's response to the expectations and needs of the local community, which have emerged from the Group's systematic consultation procedures.

5.4 BIODIVERSITY

The Group undertakes initiatives to protect biodiversity, by fully complying with the relevant legislation and environmental requirements, as well as the environmental management processes applied to projects in regions with a high environmental value.

The Group takes into consideration the environmental requirements of projects or activities in areas neighboring sensitive regions, and monitors protected species (flora and fauna), as listed in the approved environmental terms.

Concessions Segment

ATTIKI ODOS implements landscape management to ensure that the motorway complements the surrounding environment. In 2020, 800,000 trees and bushes as well as 78,000 m² of turf have been maintained.



RES project located in NATURA areas and important areas for birds

Municipality	Location	Type of Project	Natura (SPA, SAC)
Alexandroupoli	Magoula Kazakou Diplon	W/F	-
Arriana- Alexandroupoli	Orfeas-Eptadendros	W/F	-
Argos-Mycenae Tripoli	Lyrkeio	W/F	SPA:GR2510004
Grevena	River Smixiotikos	MYHE	SPA:GR1310004
Zitsa and Pogonio	Kasidiaris 1 Karnies-Karavamia-Elatos	W/F	-
Kefalonia	Monolati-Kseroliba	W/F	SPA:GR2220006
Kefalonia	Agia Dinati	W/F	SPA:GR2220006
Lesvos	Skamniouda-Pachis Ridge	W/F	SPA:GR4110010
Lesvos	Skamniouda-Pachis Ridge	W/F	SPA:GR4110010
Monemvassia	Mali Madi Metamorfosseos	W/F	-
Monemvassia	Kalogerovouni -Poulos	W/F	SPA:GR2540007, SAC:GR2540001
Monemvassia	Gropes-Rahi Gioni	W/F	-
Pogonio	Kasidiaris 2 Agriahladia - Pr. Ilias - Petra Haidos - Diavolorahi - Pr. Ilias	W/F	-

Important bird areas:  GR005,  GR050,  GR072,  GR085,  GR118,  GR123,  GR134

Monitoring avifauna: 

Construction Segment

The company HELLENIC QUARRIES operates a quarry at “Mavra Vouna” at the Municipality of West Achaea. The quarry is located in the location “Limnothalassa Kalogrias, Dasos Strofylas kai Eleos Lamias – GR2320001”, which is included in the European Network of Protected Sites Natura 2000 (Special Areas of Conservation, and Special Protection Areas of Avifauna).

To ensure the protection of biodiversity, permanent monitoring of the area is carried out, as well as the following actions:

- Monitoring and recording of avifauna’s patterns and the otter population in the area of the quarry and within a radius of 700 meters from its outer boundaries. The results are then submitted to the Ministry of Environment and Energy.
- Reforestation and afforestation, in accordance with approved studies from the competent authorities.
- Creation of slopes and cavities in the area’s hills, to attract and nest wildlife/predators. The procedure is taking place in consultation with the Managing Body of the Kotychi – Strofylia Wetlands.



06 SOCIETY



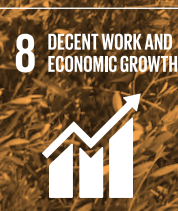
€ 3,971 thousand in community investments



18% of Group's net sales came from sustainable products and services



Management of 47 tons of medical waste from the NIMTS hospital, at no cost, to support the work of public health services dealing with the COVID-19 pandemic



6.1 CREATING VALUE FOR SOCIETY

One key objective and strategic priority for the Group is to operate responsibly within the society where it operates, so as to enhance its positive footprint and return value to it. The Group contributes to the welfare of society through its business operations and social activities, responding consistently, responsibly and transparently to the demands and needs of society.

2020 Group Financial Results

The Group's consolidated net sales, from all its activities in Greece and abroad, for the fiscal year 2020 amounted to € 892,293 thousand. The consolidated financial data of the Group for the 2020 fiscal year reflects the following key indicators:

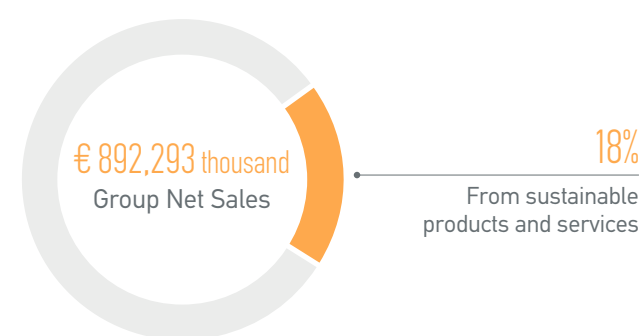
- **Assets:** € 2,821,808 thousand
- **Liabilities:** € 2,489,463 thousand
- **Equity:** € 332,346 thousand

Economic Value 2020 (thousand €)	ELLAKTOR Group
Net sales	892,293
Financial income, other income and profits	58,169
Economic value created	950,462
Operating cost	783,203
Employees' salaries and benefits	
> Salaries and wages	143,966
> Social insurance expenses	33,127
> Cost of defined benefit programmes	5,284
> Other benefits to employees	13,229
Payments to capital providers	98,732
Payments to government agencies	41,086
Community investments	3,971*
Economic value distributed	1,122,599
Economic value retained	(172,137)

* The amount refers to donations (financial and in kind), as well as to sponsorships for activities with social benefit and it includes € 2,835 thousand, which is the compensatory fee of 3% on the turnover (pre-VAT sales) of the wind farms that is withheld and allocated as follows: 2.7% to the local community and 0.3% to the Green Fund. Furthermore, it also includes € 6,022 which is a compensatory fee of 1% on turnover (sales before VAT) allocated in addition to 3% by a small hydroelectric station of the Group in favour of the management body.

The Group's **2020 Annual Financial Report**, which includes the Board of Director's Report and the Annual Financial Statements, is available on the Group's website.

It is estimated that 18%* of the income from the activities of the Group's companies in 2020 came from products and services that have environmental and/or social benefits. This category includes revenues from RES energy production, waste management, biomass utilisation, as well as the sale of recyclable materials.



* The percentage is derived from the available data of the RES and Environment segments.

Ensuring Health, Safety and Experience of Users

Concessions Segment

The safety and level of service provided to the users of motorways constitute key focus areas of the Group's companies that are responsible for their operation and maintenance. The companies ensure the proper maintenance, safety and smooth operation of the motorways, so that commuting becomes safer and more comfortable for the users. On Attiki Odos, the average response time to incidents is 5.8 minutes.

The company ATTIKES DIADROMES implements the specifications of the ISO 39001:2012 standard on road traffic safety management, receiving several awards in the field of road safety from the European Commission, the International Road Federation (IRF) and the International Bridge, Tunnel and Turnpike Association (IBTTA).

The positive effect of these actions is reflected by the drivers' responses in the annual survey of subscribers and drivers in regard to the sense of safety. However, in 2020, the survey was not conducted due to restrictions imposed in response to the COVID-19 pandemic. In the most recent study conducted in 2019, it was reported that 97.3% of respondents stated that they feel very / quite safe when driving on the Attiki Odos motorway.

For user safety during the COVID-19 pandemic, the following measures were implemented on Attiki Odos and Moreas motorway:

- Press releases and informative emails to subscribers/drivers proposing the payment at toll stations to be executed by credit card instead of cash, or via electronic transponders to protect both employees and drivers.
- Temporary closure of the 9 Customer Service Points on Attiki Odos and the 3 Service Points on the Moreas motorway (Spathovouni, Nestani, Kalamata) with simultaneous exclusive operation of the Telephone Customer Service, which was significantly strengthened. During this period, subscriber registrations and the provision of electronic transponders were made via telephone and courier, while the recharges of the electronic transponders were made electronically.
- Installation of protective plexi-glass at Toll Stations, where necessary.
- Use of equipment for the convenience of contactless transactions with debit / credit cards via POS and transit cards.

Real Estate Development Segment

In the Real Estate Development segment, and more specifically regarding the operation of the commercial Smart Park of the Group's company YIALOU EMPORIKI & TOURISTIKI, the health and safety of visitors and employees of the park are a key priority.

The Smart Park was designed and built to provide visitors a safe outdoor walk, free of cars and motorbikes, while also taking into account the needs of visitors with disabilities.

In 2017, the communal areas of the Park were certified in accordance with the requirements and recommendations of the EL0T 1439:2013 standard "Organisation friendly to citizens with disabilities - Requirements and recommendations", with respect to:

- accessible parking spaces,
- accessible entrance,
- accessible routes (horizontal and vertical),
- accessible assistance and services,
- accessible fixed equipment,
- accessible exits and
- employee training and education.

The design and construction of the Smart Park expansion, consisting of an area of 15,200 m²., which was completed in November 2019, took into account the specifications of the EL0T 1439:2013 standard. The company will proceed with the certification and expansion of the Park in accordance with the standard, with the aim to include all the facilities of the park within the scope of certification.

In the context of the maintenance of the park's communal areas, in addition to regular maintenance, the periodic inspection certificates of all lifting equipment (lifts, escalators and stairs) used both by visitors and employees of the Smart Park, are renewed annually according to the Law.

Additionally, the Smart Park playground, which is accessible to all to visitors, is certified according to EL0T EN 1176:2008 and EL0T EN 1177:2008 standards.

Smart Park's security personnel is trained in First Aid and in cases of urgent needs, specially designed areas are provided in several locations of the park that include emergency first aid equipment, such as 2 defibrillators.

All fire extinguishing facilities, fire detectors, portable fire extinguishing equipment, etc. are regularly maintained in accordance with the latest provisions of the Law, whereas the Fire Safety Certificate is renewed at scheduled intervals. Among other things, the Smart Park has a Fire Safety Team, of which most members have been trained at the facilities of the Fire Academy.

As part of the security measures imposed for the management of the COVID-19 pandemic, the Smart Park proceeded in implementing the following measures for the safety of visitors and employees of the Park:

- Installation of an automatic disinfection system using the UV technology "Air Sterilizer" in the passenger lift cabin.
- Installation of an automatic disinfection system using "Ultra UV Pro" technology for the railings of escalators and stairs.
- Installation of antiseptic liquids for the users of the shared WCs of the Park and the ATM area.
- More frequent cleaning and disinfection of the shared WC areas during the operation of the Park.
- Placing signs for distance monitoring and awareness in all common areas of the Park.
- Placing signs at the entrances of public elevators with information on who is allowed to use them and what is the maximum number of passengers allowed according to state regulations.
- Installation of an audio message, which is repeated every 7 minutes in the loudspeaker of the Park, informing on allowed distance among visitors as well as visitors complying with the instructions of the Park's security staff regarding the pandemic.

In a survey conducted in 2019, with the participation of 1,024 visitors and employees of the Smart Park, the average response in regard to the sense of safety within the premises of the park was 9.16 on a scale from 1 to 10. In 2020, due to the pandemic, no relevant survey was conducted.

Ensuring Construction Safety

The safety of all construction facilities throughout their construction and maintenance is ensured through the systematic application of the relevant requirements, which are outlined in their respective contractual agreements, as well as in the national and international control standards concerning the construction facilities. The effective management of requirements is achieved by establishing

appropriate inspection procedures, integrating them into the Quality Management Systems and allocating appropriate resources (staff, equipment, materials, external associates, etc.) to ensure their effective implementation. In this regard, it is ensured that:

- Potential risks pertaining to the safety and integrity of the construction facilities are identified and appropriate risk avoidance and/or mitigation plans are implemented.
- Appropriate control procedures and programmes are developed to ensure that inspections are performed at pre-determined intervals and standard inspection steps are followed.
- Results of the respective audits are evaluated, and appropriate corrective actions are implemented where required.
- Inspections are carried out by experienced and specialised personnel.
- Experienced and reliable external associates are used to carry out inspections that require specialised knowledge and/or means, who guarantee the integrity of the process and the results of the inspections performed.
- Materials and products are utilised, only if in compliance with the basic requirements (legislation, safety and health, etc.). The requirements are justified by the documentation provided from the respective manufacturers/suppliers (e.g. performance statements, lab results, etc.).

Control Procedures are regularly evaluated (and appropriately adjusted) to ensure that the relevant standards and requirements are covered.

Indicatively, in the Concessions segment, ATTIKES DIADROMES conducts regular checks and inspections at the technical elements of Attiki Odos based on the Greek State's Inspection and Maintenance Manual. It also makes recommendations for heavy maintenance and/or improvements to ATTIKI ODOS, which then proceeds with developing the relevant implementation plan.

Corrective works (reworks) were carried out as a result of internal audits in the Construction segment within 2020, to ensure the safety of constructions for three projects. The total cost of these reworks amounted to € 1,516,054.

Improving the Urban and Structured Environment

ELLAKTOR Group contributes substantially to the expansion of the urban environment through the Construction segment, while a key focus of its Real Estate Development segment is the upgrade of the residential environment, the protection of free spaces and the creation and redevelopment of recreational areas.

The Group, continuing its significant trajectory, implemented high quality projects, including Line 2 of the Athens Metro, the "Golden Line" of the Doha Metro in Qatar, the **Acropolis Museum**, the National Gallery, the **Rion-Antirion Bridge**, the Psytalia Wastewater Treatment Plant, The First Section of the Trans-Adriatic Natural Gas Pipeline (TAP) and it continues with investments in new projects such as the use, operation and management of Alimos Marina and the **Cambas Park**, one of the biggest investment projects in Attiki, with total budget of € 200 million. The aim of the projects is to improve the quality of life of people and local communities in the areas it operates in, with the aim of protecting and enhancing the urban environment.

The construction of all projects is carried out according to the latest standards, applicable environmental legislation and approved environmental terms.

In the Concessions segment, specifically in regard to the Attiki Odos project, sections of the motorway were covered, where possible (e.g. in Vrilissia and West Ymittos Avenue). The aim of these works is to embed the motorway with the environment and urban landscape. Moreover, in order to prevent the negative effects in incidents of extreme weather, extensive flood control works and consistent tree planting were carried out on the slopes of the motorway.

In the Real Estate Development segment, Smart Park, which is ranked among the most important projects of the Group, is the largest open commercial park in Greece, with a total area of 53,300 m². (with 4.1 million visitors in 2020). Aside from being an outdoor shopping park, it is also a significant entertainment hub for the area, with a playground, restaurants, summer cinema and a "natural" landscape that has 30,385 m² of green space.

Noise Management

One of the topics of concern for the local community is noise pollution. Group companies in the Concessions segment monitor the noise level along the length of the motorways through permanent and mobile noise measuring stations, according to the current legislation and contractual obligations. Employees working in the Concession segment use company vehicles and machinery on the motorways they are responsible for, in accordance with the Operations and Maintenance Manuals and environmentally-friendly driving principles, focusing on reducing pollution and noise.

The company ATTIKES DIADROMES measures noise levels through special measuring devices located at 8 points along the Attiki Odos motorway. In cases where noise levels are too high, ATTIKI ODOS installs noise barriers, following the approval from the Greek State. In 2020, 126 24-hour measurements were carried out with mobile noise measurement units. Based on the measurements, no further installation of sound barriers was required. Overall, 21 km of noise barriers as well as motorway embankments have been installed, throughout the 19-year operation of the motorway.

Respectively, MOREAS monitors road traffic noise indicators on an annual basis. Any requests of homeowners near the motorway are examined and evaluated by the Public Sector's competent Authorities. MOREAS updates monitoring procedures following relevant guidelines and directions from the competent Authorities. In 2020, 18 road traffic noise measurements were carried out in a total of 18 approved locations along the motorway. Since the start of the operation of the concession project, in 2008, until 2020, no exceedance of the established noise limits has been recorded.

For projects in the Construction segment that are implemented near settlements and within residential areas, traffic regulations are monitored, and vibration and noise measurements are carried out. Each project follows the procedures of the certified Environmental Management System and the approved environmental terms. In cases the project is located near settlements or residential areas, the noise generated by construction activity is monitored and the appropriate noise reduction/prevention measures are taken. Indicatively, in the AKTOR "Thessaloniki Metro-Base Line" and "Thessaloniki Metro-Extension to Kalamaria" projects in 2020, 98 twenty-four hour and 60 four-hour noise measurements were performed. 6 one-hour incidents were recorded where established noise limits had been exceeded, however irrelevant to construction works.

No exceedances of the set noise limits were recorded for either project.

More specifically, and in accordance with the requirements of AKTOR's Environmental Management System, the following noise prevention measures are implemented:

- measurement of noise level, occurring from construction machinery and construction-site vehicles moving inside and outside of the sites.
- use of new anti-noise technology and construction equipment, while also prohibiting the use of machinery, which fail to comply with the EEC noise certifications (CE).
- systematic maintenance, regular inspection and noise measurement of the mobile equipment and the equipment that is not part of the constructions sites, in order to ensure the compliance with the permitted noise levels.
- installation of noise barriers in areas where there is construction site noise, especially in residential areas.
- refrain from conducting disrupting/noisy works during communal quiet hours and
- avoiding the parallel operation of construction machinery.

In case of complaints received from the local community, disturbances are inspected and assessed by carrying out additional noise measurements and any necessary maintenance works. In 2020, there were no significant complaints from the local community pertaining to issues with noise levels, however there were verbal complaints that were dealt with on the spot by the project's respective Environmental Officers and engineers.

6.2 COMMUNICATING WITH LOCAL COMMUNITIES

A key concern of the Group throughout its operations is building relationships of trust, solidarity and mutual respect with the local communities in which it operates.

Regarding the activities of the Group's Renewable Energy Sources segment, where environmental licensing and public consultation of environmental impact assessments is required for each project, the company proceeds with informing the regional councils and committees, municipal and community councils and services, as well as institutionalised environmental bodies and organisations. The observations and concerns of local authorities and regulatory bodies are taken into account when designing projects (see **Biodiversity** section).

Respectively, in projects of the Real Estate Development segment, the Group proceeds with the planning and implementation of the projects following consultation with the local community and taking into account its needs and expectations. With regard to the development of the emblematic Cambas Park, the company KANTZA EMPORIKI has signed a memorandum of cooperation with the

Municipality of Pallini, which combines the preservation of the historic Camba winery in Pallini with the modern development of a mixed-use complex.

6.3 SOCIAL INVESTMENT

In the beginning of 2020, taking into account the needs of local communities and the opportunities provided by the expertise and resources available, the Group established a new strategy, aiming at the effective support of local communities, which is now the 5th pillar of the Group's sustainable development strategy (see **Business Model** section). The strategic pillar which is related to the support of local communities focuses on **5 areas**.

Local Communities Support – Focus Areas



Young people / education

The Group seeks opportunities that enable to share its experience and expertise with young people, so that they can effectively integrate this knowledge into their student and academic life, as well as in their future job search.



Infrastructure

The Group leverages on its experience and available resources to help improve infrastructure at the local level and thus improve the residents' quality of life in the areas where it operates.



Environment

The Group utilises its experience and available resources to promote recycling, energy saving, the use of small-scale renewable energy sources and the protection of biodiversity in the areas where it operates.



Culture

The Group utilises its experience and available resources, to support cultural programmes and initiatives (such as restorations/preservation of buildings of cultural importance and archaeological work) that support and stimulate the local economy.



Road safety

The Group develops programmes for the education and awareness of children and adults on road safety issues, while also supporting animal welfare organisations, aiming to treat and manage the number of stray animals, simultaneously protecting them and reducing road accidents involving animals.

All actions that the Group supports at a national and local level should be compliant with the focus areas above.

Although this strategy is the main guide for the local community support actions that the Group chooses to adopt, the COVID-19 pandemic has created many needs at local and national level, which the Group has responded to above and beyond the established strategy.

Strengthening public health structures during the COVID-19 pandemic

From March 2020 up until today, ELLAKTOR Group has been contributing to the collective efforts against the pandemic, having undertaken, at its own expense, the critical task for the protection of public health by collecting, transporting and safely managing all medical waste coming from the COVID-19 Incident Care Centre of the Army Pension Fund Hospital (NIMTS). The medical waste amounted to more than 47 tons for 2020.

With respect and gratitude towards the public hospitals' valuable contribution in tackling the COVID-19 pandemic, ELLAKTOR Group responded to the urgent needs of the Papageorgiou Thessaloniki General Hospital by donating 10 alternating pressure mattresses with their air pumps for the hospital's Intensive Care Units (ICU).

In addition, AKTOR donated 5 ePM15 vital signs monitoring devices to the General Hospital of Serres. In parallel, recognizing the daily and increasing needs of public hospitals, AKTOR provided a container to the General Hospital of Aigio for the reception and examination of potential COVID-19 cases.

ATTIKI ODOS and ATTIKES DIADROMES donated 5 portable ventilators to the "Attikon" General University Hospital and 3 portable ventilators to the General Hospital of Elefsina "Thriasio". The portable ventilators are suitable to be used in ICUs, as well as for normal treatment needs.

Initiative Supporting Local Communities

The companies of the Group develop their social contribution initiatives depending on their segments of operations as well as on the needs of the local and the wider community in the areas where they operate. In 2020, the actions

implemented by the Group companies were affected either by the needs that arose or by the restrictions imposed due to the COVID-19 pandemic. Some of the programmes and initiatives implemented by the Group's companies in 2020 are indicated below.

Concessions Segment

The actions and programmes implemented by ATTIKI ODOS and ATTIKES DIADROMES have focused for more than 10 years on the education and awareness of children, young people and adults in road safety issues. Due to the pandemic, emphasis was placed on the utilisation of the digital corporate programmes, while respective programmes which required the physical presence of children, teachers and parents, were temporarily suspended. These programmes, including the experiential educational performance "Attikoulis and the kingdom of Atzamosini", the interactive exhibit that runs through the ground floor of the Hellenic Children's Museum and the "Commuting Safely" program, implemented in collaboration with the Road Safety Institute "Panos Mylonas", will all be available to the children following the lifting of restrictive measures imposed by the pandemic. Indicatively, in 2020:

- More than 3,700 High School students from 30 schools across the country gained access to the e-Learning version of "Open Eyes on the Road" which has received the approval from the Ministry of Education's Institute of Educational Policy. This is the progression of the interactive seminar with the same title, created to address the challenges of the digital era and raise awareness about the important issue of road safety, in a modern and effective way, targeting students and teachers all over Greece, especially those of the most remote islands and villages.
- Attiki Odos reached the young audience through the youth television station Mad TV by screening three (3) videos lasting one minute each related to being distracted while driving. The videos were titled "Safety and the City by Attiki Odos".
- An informative campaign entitled "Born to be Wild & Safe" has been launched to raise motorcyclists' awareness on the importance of appropriate equipment and clothing while riding. The campaign was published in specialised car industry media in order to reach the relevant audience in the best possible way.

Also, the companies ATTIKI ODOS and ATTIKES DIADROMES strengthen their relationships with the neighbouring municipalities, through programmes focusing on raising education and awareness of children regarding road safety issues, and the support in cases of emergencies (such as floods and earthquakes).

With the aim of stimulating the local economy impacted by the pandemic, in 2020, MOREAS supported the implementation of the 26th International Dance Festival of Kalamata, which was organised in compliance with the necessary measures for the protection of public health.

Finally, AKTOR CONCESSIONS sponsors the Prom Racing student team, which represents the National Technical University of Athens (School of Mechanical Engineering and School of Electrical and Computer Engineering) and participates in some of the largest Formula Student competitions every year. In 2020, the team successfully completed the design and construction of its first electric racing car. Due to the new conditions related to the pandemic, all relevant competitions were cancelled and replaced by the Formula Student Online Event. The Prom Racing team took part and won 6th place in the electric category of the overall static races ranking.

Renewable Energy Sources Segment

Initiatives supported by the companies in the Renewable Energy Sources segment in 2020, focused on improving the infrastructure of the local communities, in which wind farms are being constructed or operate. Such initiatives include amongst other things the following:

- In the Municipality of Monemvasia, amongst other things, the Group undertook the cost of maintenance for the old primary school, asphalt and cement paving for the streets of Rachia Laconias and a study that is going to register and emphasise the needs of the municipality to be prepared at a Civil Protection level.
- In the Municipality of Voio in Kozani, the Group undertook the expenditure of seven technical projects concerning the management of rainwater in the local community of Eratira.
- In the Municipality of Zitsa, Ioannina, the Group undertook the expenditure of renovating the soccer field in the local community of Eleousa.

- In the Municipality of Karystos, the Group donated 28 electronic tablets to support the students of the municipality's schools, due to the special circumstances as prompted by the COVID-19 pandemic.

In addition, funds were donated to support the work of local organisations and cultural associations such as: the Regional Fire Department of Epirus, the Cultural Association of Prosvoro Grevena, the Holy Dormition of the Theotokou Orthodox Church and the Department of Rhythmic Gymnastics of the Lavrio Tennis Club.

It should also be noted that in 2020, the local communities in which the Group's RES projects operate, received the RES compensatory fee, equivalent to 3% of the total sales of electricity (before VAT). The total amount of € 2,835,751, equivalent to the aforementioned 3% of relevant sales, is divided as follows:

- Approximately 57% is allocated to first-degree Local Authorities, of the regions where each project and interconnection projects are located (approximately € 1,606,926).
- Approximately 10% is attributed to the Green Fund (approximately € 283,575).
- Approximately 33% of this amount is allocated to residential consumers of the local community, where each project is located, through the electricity supplier (approximately € 945,250).

Finally, regarding the small hydroelectric station at Smixiotiko, in addition to the above attributions, approximately 1% is also attributed to the sales of the station's electricity (before VAT) in favour of the management body (total € 6,022).

Environment Segment

The actions and programmes implemented by the Group's companies, which are active in the Environmental segment, focus on strengthening the infrastructure of the areas in which they operate, as well as educating and raising awareness on environmental protection issues, with an emphasis on recycling. In this context, in 2020:

- HELECTOR responded to the needs of the Municipality of Athens by covering the expenditure and execution of all the construction works for the reconstruction of Omonia Square; a significant landmark for the Municipality and its inhabitants.

- Group companies which operate in medical waste management, APOTEFROTIRAS, STERILISATION and HELECTOR S.A.- ARSI S.A. JOINT VENTURE, provide free medical waste management services to NIMTS hospital, which amounted to more than 47 tons for 2020, contributing to the efforts of public hospitals against the pandemic COVID-19.
- HELECTOR supported the implementation of the 13th International Chess Tournament of Paleochora, Chania, with the aim of contributing to increasing numbers of visitors and the strengthening of the local economy.

Construction Segment

The companies which operate in the Construction segment, support local communities, listen to their needs and manage their requests. In cases of severe weather, or when needed, they provide emergency assistance such as snow removal, road repairs, flood prevention and fire protection, while also providing routine maintenance and improvement of existing infrastructure. Upon the completion of local projects, it is common practice for the companies to donate equipment, helping local bodies to cover their needs.

Indicatively, in 2020, the following were some of the activities implemented by AKTOR, in response to the requests and needs from local bodies for the improvement and upgrading of infrastructure, as well as the support in cases of emergencies:

- Restoration works for the repair of the extensive damages from the catastrophic floods in Chalkida, in Vassilikos of Chalkida and also in areas of the Municipality of Dirfion.
- Construction of asphalt pavement in the village of Galatini and in Siatista of the Municipality of Voio, Kozani.
- Cleaning and maintenance of a forest road in the pine forest area of Ano Ziria - Ano Rodini of the Municipality of Aigio.
- Donation of 5 ePM15 vital signs monitoring at the General Hospital of Serres.
- Free provision of a portable office container for the reception and examination of possible COVID-19 cases at the General Hospital of Aigio.



In February 2021, the company TOMI provided necessary equipment at the disposal of Attica Region, whilst its employees' experience accelerated the efforts in the cutting and removal of trees collapsed onto power lines, due to heavy snow in the Municipality of Dionysos Attica. At the same time, it assisted with the provision of equipment and personnel for snow removal in areas of the Municipality of Vari - Voula - Vouliagmeni which were affected by the severe snowfall.

It is noted that the companies of the Group prioritise hiring staff from the local communities in which they operate in. Indicatively, it is stated that more than 90% of the employees in the Concessions segment, 85% of the employees in the RES segment, 68% of the employees in the Environment segment, 70% of the employees in the Construction segment, as well as 100% of the employees in the Real Estate segment, come from local communities.

Supporting Non-Governmental Organisations

At the same time, the Group and its companies fiscally support credible and recognised non-profit organisations, social establishments (e.g. orphanages), institutions and local associations (e.g. sports clubs, choirs and cultural centres), while also sponsoring educational events, emphasizing on the sharing of know-how and expertise.

Since 2016, the companies of the Group (ELLAKTOR, AKTOR, HELECTOR, ATTIKI ODOS, ATTIKES DIADROMES and REDS) have undertaken the entire expenditure of the preparatory stage of fulfilling the wishes of children (ages 3-18) that are suffering from severe illnesses, through the "Make-a-Wish Greece" organisation. In 2020, despite the difficulties caused by the COVID-19 pandemic, the organisation completed the preparatory stage for 260 wishes, thanks to the contribution of the Group's companies.

Among the organisations supported by the Group and its companies in 2020, are the "DIAZOMA" Association, the "Pediatric Trauma Care" Association, the Association of Friends child cancer "Storgi", the "Centre for Special Children - Saint Spyridon", the "SOS Children's Villages Greece", the "Hadjikyriakeio Foundation for Child Protection", the "Ark of the World", the Elderly Care and Chronically Ill Foundation "Agios Leonidas", and the Association for the Protection and Care of Wildlife "ANIMA".

Employee Volunteering

The Group's employees actively participate in voluntary social solidarity events held annually. However, due to the COVID-19 pandemic, in 2020, no voluntary actions were carried out, except for the voluntary blood donation of HELECTOR's employees.

All Group's companies that implement voluntary blood donation initiatives, offer to blood donors one day of additional leave for each participation in a voluntary blood donation event, both as an incentive and a reward.



2020 Blood Donation Data for the Group

Blood donors	77
Blood donations	2
Blood Units	77
Blood Units used by Group employees	40



07

APPENDIX

7.1 REPORT METHODOLOGY

The purpose of the Sustainable Development Report is to inform stakeholders fully and comprehensively about the sustainable development activities of ELLAKTOR Group in 2020. In conjunction with the disclosure of the Group's actions over the past year, this Report presents the Group's new business strategy for sustainable development.

The Group's Sustainable Development Division is responsible for collecting the data of the Report.

The 2020 Sustainability Report refers to the reporting period from 01.01.2020 to 31.12.2020 and covers the Group's companies based in Greece, Germany, Jordan, Qatar, Cyprus and Romania, in which the Group is a majority stakeholder and/or exercises management. The companies whose data is included in the Sustainable Development Report 2020 represent 90% of the total turnover of the Group. The financial results presented, refer to the overall operation of the Group, inside and outside of Greece.

Regarding the aggregate data that is presented in the **Environment** chapter, please note that:

- The data regarding AKTOR's and HELECTOR's joint ventures is aggregate and does not correspond to the share of the company in the joint ventures.
- The data for the company REDS includes only the common areas of the Smart Park and not the areas that are rented out.
- The data regarding waste management, does not include the performance of TOMI company, which represents 3% of the total Group's turnover.

The data for 2020 covers more activities than the data of the respective reports for previous years. For this reason, it was not possible to include comparisons of data with previous years and the Report presents numerical data solely for 2020. Where comparison is feasible, any deviations from previous years have been presented and explained in the relevant sections of the Report.

The present Sustainable Development Report has been drafted "in accordance" with the core option of the Global Reporting Initiative guidelines (GRI Standards) and its four basic principles (stakeholder inclusiveness, sustainability context, materiality, and completeness). Additional standards that have been used for the preparation of the Report include the GRI Supplements for the Electric Utilities Sector and for the Construction and Real Estate Sector, the 10 Principles of the UN Global Compact, the ESG Reporting Guide of the Athens Stock Exchange and the guidelines of the Sustainability Accounting Standards Board (SASB) for the "Engineering and Construction Services" and "Waste Management" sectors.

In order to identify the most material topics for the sustainable development of the Group, the results of the materiality analysis conducted in the beginning of 2021 were utilised.

The Report was prepared in collaboration with **KKS Advisors**.

The Report is subject to external assurance for the first time (see **Independent Limited Assurance Report**).

For any clarifications regarding the Sustainability Report for 2020, please contact:

Nafsika Zevgoli
Group Sustainable Development Manager
Tel.: +30 2108185059
E-mail: sustainability@ellaktor.com
Ermou 25, Nea Kifisia 145 64

7.2 GRI STANDARDS TABLE

The Standards of the Global Reporting Initiative (GRI), have been taken into account in the preparation of this Report. The 2020 Sustainable Development Report has been drafted in accordance with the GRI Standards core option.

The 2016 edition of the standards is used for all indicators, except for 303 and 403, for which the 2018 edition has been used.

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
GRI 101 Foundation		
GRI 102 General Disclosures		
Organisational Profile		
102-1	Name of the Organisation	ELLAKTOR S.A. is the parent company of the ELLAKTOR Group.
102-2	Activities, brands, products, and services	Report Page: 11-16
102-3	Location of headquarters	Ermou 25, 145 64 Kifisia
102-4	Location of operations	Report Page: 11
102-5	Ownership and legal form	Engineering, Holding and Services Société Anonyme.
102-6	Markets served	Report Page: 11
102-7	Scale of the organisation	Report Page: 11, 111-112
102-8	Information on employees and other workers	Report Page: 63-64
102-9	Supply chain	Report Page: 54-55
102-10	Significant changes to the organisation and its supply chain	Report Page: 11-18
102-11	Precautionary Principle or approach	Report Page: 26-27, 43-44, 47-52, 81-82, 86-88, 90-91, 106-107, 112-115
102-12	External initiatives	Report Page: 18-19, 26-27
102-13	Membership of associations	Report Page: 18-19

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Strategy		
102-14	Statement from senior decision-maker	Report Page: 6-7
Ethics and Integrity		
102-16	Values, principles, standards, and norms of behaviour	Report Page: 43-52
Governance		
102-18	Governance structure	Report Page: 43
Stakeholder Engagement		
102-40	List of stakeholder groups	Report Page: 29
102-41	Percentage of employees covered by Collective Bargaining Agreements	Report Page: 71
102-42	Identifying and selecting stakeholders	Report Page: 29-31
102-43	Approach to stakeholder engagement	Report Page: 24-25, 29-31
102-44	Key topics and concerns raised by stakeholders	Report Page: 29-31, 115-116
Reporting Practice		
102-45	Entities included in the consolidated financial statements	Annual Financial Report (pg. 152 - 161) Report Page: 123
102-46	Defining report content and topic Boundaries	Report Page: 123, 126-130
102-47	List of material topics	Report Page: 24-25

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
102-48	Restatements of information	Any restatements (where they exist) are noted with comments within the text and/or with footnotes. Report Page: 123
102-49	Significant changes in reporting	Any significant changes (where they exist) are noted with comments within the text and/or with footnotes. Report Page: 123
102-50	Reporting period	Report Page: 123
102-51	Date of most recent report	July 2020
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	Report Page: 123
102-54	Claims of reporting in accordance with the GRI Standards	Report Page: 123
102-55	GRI content index	Report Page: 124-132
102-56	External assurance	Report Page: 139-142

Topic – Specific Disclosures

Creation and distribution of economic value

103-1	Explanation of the material topic and its boundary	The material topic impacts all of the Group's core business activities and has the potential to affect shareholders, investors and bondholders, banks and financial institutions, suppliers, partners, and subcontractors, as well as local communities in which it operates. Report Page: 111-115
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
201-1	Direct economic value generated and distributed	

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Safeguarding regulatory compliance and business ethics		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and has the potential to affect shareholders, investors and bondholders, banks and financial institutions, employees, and state and regulatory authorities. Report Page: 43-47
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
205-2	Communication and training about anti-corruption policies and procedures	
205-3	Confirmed incidents of corruption and actions taken	Report Page: 46
Safeguarding occupational health, safety and wellbeing of employees (including subcontractors' employees)		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and has the potential to affect employees and sub-contractors. Report Page: 71-78
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
403-1	Occupational health and safety management system	
403-2	Hazard identification, risk assessment, and incident investigation	Report Page: 72-74
403-3	Occupational health services	Report Page: 72-74
403-4	Worker participation, consultation, and communication on occupational health and safety	Report Page: 72
403-5	Worker training on occupational health and safety	Report Page: 77-78
403-6	Promotion of worker health	Report Page: 71, 73
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Report Page: 72-78

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
403-9	Work-related injuries	Rate of fatalities as a result of work-related injury: 0.12 Rate of high-consequence work-related injuries (excluding fatal accidents): 0.19 The above indicators were calculated by every 1 million working hours. Total working hours: 16,020,320 Report Page: 75-76
Contribution to greater availability and reliability of renewable energy sources and to energy transition and the decarbonization of electricity generation		
103-1	Explanation of the material topic and its Boundary	The material topic has an overall impact on the operation of the Group, while it contributes to the increase of the availability and reliability of RES through relevant activity. The topic has the potential to affect customers, shareholders, investors and bondholders, state and regulatory authorities, local communities and local government as well as the wider community. Report Page: 81-86
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
Reinforcing innovation and digital transformation		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and has the potential to affect employees, customers, suppliers, partners, sub-contractors and users. Report Page: 57-61
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
Safeguarding health, safety and positive experience of end users and structural integrity and safety		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and has the potential to affect employees, customers, suppliers, partners, sub-contractors and users. Report Page: 112-114
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Ensuring business continuity and emergency preparedness		
103-1	Explanation of the material topic and its Boundary	The material topic has a significant impact on the Group's core business activities and has the potential to affect all stakeholders. Report Page: 47-52
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
Safeguarding human rights at the workplace		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and foremost has the potential to affect employees and sub-contractors and incidentally all stakeholders. Report Page: 71
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
405-1	Diversity of governance bodies and employees	Report Page: 44, 63-65, 71
406-1	Incidents of discrimination and corrective actions taken	Report Page: 71
412-1	Total number of operations that have been subject to human rights reviews or human rights impact assessments	Report Page: 71
412-2	Employee training on human rights policies or procedures	Report Page: 71
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	In 2020, there was no significant investment contract that took into account the management of human rights issues.
Reducing consumption of non-renewable energy sources and improving energy efficiency, as well as reducing and offsetting greenhouse gas emissions and other gaseous pollutants (e.g. NOx, SOx, VOCs)		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and has the potential to affect shareholders,

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
103-2	The management approach and its components	investors and bondholders, state and local communities. Report Page: 90-97
103-3	Evaluation of the management approach	
302-1	Energy consumption within the organization	Report Page: 92
302-3	Energy intensity	Report Page: 91-92
305-1	Direct (Scope 1) GHG emissions	Report Page: 95
305-2	Energy indirect (Scope 2) GHG emissions	Report Page: 95
305-4	GHG emissions intensity	Greenhouse gas emissions per turnover amounted to 0.11 kg CO2 eq./€
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Report Page: 96-97
Contribution to the circular economy with the design, construction and operation of modern waste treatment plants		
103-1	Explanation of the material topic and its Boundary	The material topic impacts all of the Group's core business activities and has the potential to affect customers, shareholders, investors, bondholders, state and regulatory authorities, local communities, local government as well as the wider community. Report Page: 86-89, 99-106
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
306-2	Waste by type and disposal method	
Topic - Specific Disclosures – Other Topics		
Market Presence		
202-2	Proportion of senior management hired from the local community	Report Page: 63
Procurement Practices		
204-1	Proportion of spending on local suppliers	Report Page: 54

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Water and Effluents		
303-3	Water withdrawal	Report Page: 98
Biodiversity		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Report Page: 108
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	In areas affected by the Group's operations, 26 species were identified that are included in the IUCN Red List, at national level.
Effluents and Waste		
306-4	Transport of hazardous waste	Report Page: 89
Employment		
401-1	New employee hires and employee turnover	Report Page: 63-65
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Report Page: 71-72
401-3	Parental leave	Report Page: 71
Training and Education		
404-1	Average hours of training per year per employee	Report Page: 68
404-2	Programmes for upgrading employee skills and transition assistance programs	Report Page: 67-69
404-3	Percentage of employees receiving regular performance and career development reviews	Report Page: 69-70

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Local Communities		
413-1	Operations with local community engagement, impact assessments, and development programmes	Report Page: 115-116
Public policy		
415-1	Political contributions	In 2020, no monetary or in-kind donations were made to political parties.
Marketing and Labelling		
417-3	Incidents of non-compliance concerning marketing communications	In 2020, there were no incidents of non-compliance regarding marketing communications for the Group's companies.
Customer Privacy		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Report Page: 46-47

7.3 ATHENS STOCK EXCHANGE ESG REPORTING GUIDE TABLE

The table below shows the metrics of the ESG Reporting Guide of the Athens Stock Exchange with the corresponding contents of the Report.

ATHEX ESG METRICS

ATHEX METRIC ID*	METRIC TITLE	SECTION / COMMENTS
Environmental		
C-E1	Scope 1 emissions	Report Page: 95
C-E2	Scope 2 emissions	Report Page: 95
C-E3	Energy consumption within the organisation	Report Page: 92
A-E1	Scope 3 emissions	Report Page: 96
A-E2	Climate change risks and opportunities	Report Page: 81-82, 86-87, 90-91
SS-E4	Water management	Report Page: 98-99
Social		
C-S1	Female employees	Report Page: 64
C-S2	Female employees in management positions	Out of the top 10% of employees by total compensation, 18% are women. Report Page: 64
C-S3	Turnover rates	Report Page: 65
C-S5	Human rights policy	Report Page: 71
C-S6	Collective bargaining agreements	Report Page: 71
C-S7	Supplier assessment	Report Page: 54-55
A-S1	Stakeholder engagement	Report Page: 29-31
A-S2	Employee training expenditure	Report Page: 68
A-S3	Gender pay gap	The gender pay gap for the Group is 28% in favour of men.

ATHEX METRIC ID*	METRIC TITLE	SECTION / COMMENTS
A-S5	Sustainable product revenue	Report Page: 112
SS-S6	Health and safety performance	Accident frequency rate: 0.86 Accident frequency rate) = (Total number of injuries / Total hours worked) x 200,000. Accident severity rate: 17.35 Accident severity rate = (Total calendar days lost due to accidents / Total hours worked) x 200,000. Report Page: 76
Governance		
C-G1	Sustainability oversight	The Sustainable Development Department reports directly to the Group CEO. Report Page: 21, 43
C-G2	Business ethics policy	Report Page: 45
C-G3	Data security policy	Report Page: 46
A-G1	Business model	Report Page: 20-23
A-G2	Materiality	Report Page: 24-25
A-G3	ESG targets	Report Page: 32-40
A-G5	External assurance	Report Page: 139-142
SS-G1	Business ethics violations	Report Page: 45

* Metric ID's that begin with C refer to core metrics, with A refer to advanced metrics and with SS refer to sector-specific metrics.

7.4 UN GLOBAL COMPACT TABLE

The table below shows the 10 principles of the United Nations Global Compact with the corresponding contents of the Report.

PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT

UNGC PRINCIPLES	SECTION / COMMENTS
Human Rights	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights	Report Page: 71
Principle 2: Businesses should make sure that they are not complicit in human rights abuses	Report Page: 71
Labour	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	Report Page: 71
Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour	Report Page: 71
Principle 5: Businesses should uphold the effective abolition of child labour	Report Page: 71
Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation	Report Page: 71
Environment	
Principle 7: Businesses should support a precautionary approach to environmental challenges	Report Page: 90-108
Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility	Report Page: 90-108
Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies	Report Page: 81-89
Anti-Corruption	
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	Report Page: 44-46

7.5 SASB TABLE

The table below shows the metrics of the Sustainability Accounting Standards Board (SASB) with the corresponding contents of the Report. The data presented in metrics relating to engineering projects marked by “EN” in the Section / Comments column, refer to the activity of the AKTOR and TOMI companies and their subsidiaries, which

belong to the construction segment. The data presented in the metrics relating to waste management projects, marked by “WM” in the Section / Comments column, refer to the activity of ELECTOR company and its subsidiaries, which belong to the Environment segment.

CODE SASB	DESCRIPTION	SECTION / COMMENTS
Environment		
Environmental Impacts of Project Development		
IF-EN 160a.1	Number of incidents of non-compliance with environmental permits, standards, and regulations	48 recorded incidents of non-compliance.
Greenhouse Gas Emissions		
IF-WM 110a.1	(1) Gross global Scope 1 emissions, percentage covered under, (2) emissions-limiting regulations, and (3) emissions-reporting regulations	(1) 7,842 tn CO ₂ eq.
IF-WM-110a.2	(1) Total landfill gas generated, (2) percentage flared, (3) percentage used for energy	(1) 1,879.490 MMBtu (2) 2.85% (3) 97.15%
Fleet Fuel Management		
IF-WM-110b.1	(1) Fleet fuel consumed, (2) percentage natural gas, (3) percentage renewable	(1) 18,696 MWh (2) 0% (3) 0%
Air Quality		
IF-WM-120a.1	Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O), (2) SO _x , (3) volatile organic compounds (VOCs), and (4) hazardous air pollutants (HAPs)	(1) 56.48 (2) 0.32 (3) 4.28
IF-WM-120a.2	Number of facilities in or near areas of dense population	None identified, according to the official data of the Hellenic Statistical Authority for the population census (2011).

CODE SASB	DESCRIPTION	SECTION / COMMENTS
Social Capital		
Structural Integrity & Safety		
IF-EN-250a.1	Amount of defect- and safety-related rework costs	Report Page: 114
IF-EN-250a.2	Total amount of monetary losses as a result of legal proceedings associated with defect and safety-related incidents	0
Human Capital		
Workforce Health & Safety		
IF-EN-250a.1	(1) Total recordable injury rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract employees	EN (1) 40 (2) 0.04 (3a) 0.60 WM (1) 17 (2) 0 (3a) 1.02
IF-EN-250a.2	Number of road accidents and incidents	2
Labor Practices		
IF-WM-310a.1	Percentage of active workforce covered under collective bargaining agreements	85%
IF-WM-310a.2	(1) Number of work stoppages and (2) total days idle	No recorded incidents of work stoppages.
Business Model & Innovation		
Recycling & Resource Recovery		
IF-WM-420a.1	(1) Amount of waste incinerated, (2) percentage hazardous, (3) processed as waste-to energy	Report Page: 88-89

CODE SASB	DESCRIPTION	SECTION / COMMENTS
IF-WM-420a.3	Amount of material (1) recycled, (2) composted, and (3) processed as waste-to energy	Report Page: 88-89
IF-WM-420a.4	Amount of electronic waste collected, percentage recovered through recycling	71 tons of electrical and electronic waste. The Group's activity does not include the collection of electronic equipment waste.
Leadership & Governance		
Business Ethics		
IF-EN-510a.1	(1) Number of active projects and (2) backlog in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	The Group has no activity in these countries.
IF-EN-510a.2	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anti-competitive practices	No fines were incurred for anticompetitive practices. Report Page: 45
IF-EN-510a.3	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behaviour in the project bidding processes	Report Page: 44-46
Activity Metrics		
IF-EN-000.A	Number of active projects	125
IF-EN-000.B	Number of commissioned projects	18
IF-EN-000.C	Total backlog	Report Page: 15

7.6 INDEPENDENT LIMITED ASSURANCE REPORT

Independent Limited Assurance Report to the Management of ELLAKTOR Group

KPMG Advisors Single Member S.A. was engaged by ELLAKTOR Group (further referred to as the "Group"), and in particular by ELLAKTOR S.A. (further referred to as the "Company"), to provide limited assurance over selected aspects of the Greek version of the Group's report titled "Sustainable Development Report 2020" (further referred to as the "Report") for the reporting period 1 January 2020 - 31 December 2020.

Scope of our assurance engagement

Our engagement was designed to provide limited assurance in accordance with ISAE 3000¹ on the following aspects of the Report ("Assurance Scopes") on a sample basis:

1. The reliability of the General Disclosures required by Global Reporting Initiative ("GRI") Standards for the "Core" option which are mentioned in the "GRI Standards Table" of the Report.
2. The reliability of selected Topic-Specific Disclosures for the following "Material Topics" as they have been identified by the Group and its stakeholders, which are mentioned in the "GRI Standards Table" of the Report:

- Creation and distribution of economic value (GRI 103 Management Approach -"MA"- and Disclosure / Indicator GRI 201-1).
- Safeguarding regulatory compliance and business ethics (MA and Indicator GRI 205-3).
- Safeguarding occupational health, safety and wellbeing of employees (including subcontractors' employees) (MA and Indicator GRI 403-9).

3. The reliability of the following Topic-Specific Disclosures which are mentioned in the "GRI Standards Table" of the Report: GRI 302-1, GRI 303-3, GRI 305-1, GRI 305-2, GRI 306-2, GRI 401-1, GRI 404-3, GRI 405-1, GRI 406-1.

4. The reliability of the quantitative data of the following indicators of the "ESG Reporting Guide (2019)" of the Athens Stock Exchange ("ATHEX") which are mentioned in the "Athens Stock Exchange ESG Reporting Guide Table" of the Report: C-E1, C-E2, C-E3, SS-E4, C-S1, C-S3, C-S6, SS-S6.

5. The Report has been developed taking into account the 10 United Nations Global Compact Principles as described in the section titled "UN Global Compact Table" of the Report.

The nature, timing and extent of evidence-gathering procedures for limited assurance is less than for reasonable assurance, and therefore a lower level of assurance is provided for the data and objectives under the limited assurance scope.

The Group and the entities comprising it, is defined within the Report. Our work for the above scopes concerned primarily the operations and activities of the Group in Greece as well other Group entities as defined in the Report.

We have not been engaged to provide assurance over any prior reporting period data, information and corporate documents presented or mentioned in the Report.

Reporting criteria used by the Group

For the Report, the Group applies the GRI Standards as declared in the section of the Report titled "Report Methodology" as well as relevant internal guidelines. In addition, for the Report the Group follows and applies the "ESG Reporting Guide (2019)" of the Athens Stock Exchange as described and declared in the section "Athens Stock Exchange ESG Reporting Guide Table" of the Report.

The Group follows the 10 United Nations Global Compact Principles taking them into account for the development of the Report as described and declared in the section titled "UN Global Compact Table" of the Report.

¹ International Standard on Assurance Engagements (ISAE) 3000: Assurance Engagements other than Audits or reviews of Historical Financial Information, issued by the International Auditing and Accounting Standards Board.

Our conclusions are based on the appropriate application of the abovementioned criteria.

Exclusions from the scope of our assurance engagement

The scope of our work did not include the financial data of the Group nor of any of its consolidated entities contained in the Report, which are subject to the statutory auditor's responsibility.

Where financial information (text and/ or data) subject to the statutory auditor's scope has been utilized within the scope of our work, KPMG's work was limited to the reliability check of the transfer of these text/ data from the audited and published Financial Statements 2020 of the Group to the relevant -within our agreed scope- sections of the Report. To obtain a thorough understanding of the Group's financial results and financial position, the relevant 2020 audited financial statements (separate and consolidated) should be consulted.

The scope of our work did not include the review / testing of the operating effectiveness of the information systems used to collect and aggregate data in relation to the agreed assurance scope.

Assurance standards we used

We conducted our engagement in accordance with ISAE 3000. As explained in more detail at the section "Responsibilities", we conducted our engagement in accordance with the International Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA Code) which requires, among other things, the independence of the members of the assurance team and of the assurance organization, including not being involved in writing the Report. The Code contains detailed requirements regarding the integrity, objectivity, confidentiality and professional competence and behavior. KPMG has internal systems and processes to monitor compliance with this Code and to prevent potential conflicts regarding independence. Our engagement was conducted by a multidisciplinary team with extensive experience in sustainability (including environmental, social and financial aspects) and sustainability assurance.

Work performed to reach our conclusions

A limited assurance engagement on a sustainability report consists of making inquiries, primarily of persons responsible for the preparation of information presented in the sustainability report, and applying analytical and other evidence gathering procedures, as appropriate. These procedures included:

- Inquiries of Management to gain an understanding of the Group's processes, on a sample basis, for determining the material issues for its key stakeholder groups.
- Interviews with relevant Group staff on a sample basis, concerning sustainability policies for material issues, and the implementation of these across the business.
- Interviews with relevant Group representatives and staff responsible for providing information in the Report, during which we also reviewed on a sample basis, systems and / or processes for information management, internal control and processing of the qualitative and quantitative information of the Report. In this context, we tested on sample basis, the reliability of the underlying text and/ or data references of our agreed assurance scope for: a) the General Disclosures and the Topic-Specific Disclosures of the "GRI Standards Table" of the Report, and b) the quantitative data of the indicators of the "ESG Reporting Guide (2019)" of the table "Athens Stock Exchange ESG Reporting Guide Table" of the Report.
- Interviews, with personnel from the Head offices of the Group in Athens, where we reviewed, on a sample basis, the procedures of developing and managing the content of the Report, as well as the current structure of the Corporate Governance in sustainability issues.
- Comparing the information presented in the Report within our agreed assurance scope to corresponding information in the relevant underlying sources, on a sample basis, to determine whether the relevant information contained in such underlying sources has been included in the Report.

- Reading the information presented in the Report within our agreed assurance scope, to determine on a sample basis, whether it is in line with our overall knowledge of, and experience with, the sustainability performance of the Group.

- Review on a sample basis, of the table in the section of the Report titled "UN Global Compact Table" in relation to the relevance of its cross-references within the Report with the 10 United Nations Global Compact Principles.

- Review on a sample basis, of the table in the section of the Report titled "Athens Stock Exchange ESG Reporting Guide Table" in relation to the relevance of its cross-references within the Report with the indicators of the "ESG Reporting Guide (2019)" within our assurance scope.

- Review, on a sample basis, of the consolidation method (e.g. spreadsheets, etc.) used to include Group quantitative data into the Report for the GRI Topic-Specific Disclosures and the indicators of the "ESG Reporting Guide (2019)" within our assurance scope.

Our conclusions

The following conclusions should be read in conjunction with the work performed and scope of our assurance engagement described above.

Assurance Scopes 1, 2 and 3: On the reliability of the General Disclosures and the Topic-Specific Disclosures within our assurance scope (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the General Disclosures and the Topic-Specific Disclosures which are mentioned in the "Scope of our assurance engagement" above (as "Assurance Scopes" 1,2,3), are not fairly stated in all material respects.

Assurance Scope 4: On the reliability of the quantitative data of the indicators of the "ESG Reporting Guide (2019)" within our assurance scope (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that the quantitative data of the indicators of the "ESG Reporting Guide (2019)" of the Athens Stock Exchange which are

mentioned in the "Scope of our assurance engagement" above (as "Assurance Scope" 4), are not fairly stated in all material respects.

Assurance Scope 5: The Report has been developed taking into account the 10 United Nations Global Compact Principles (limited assurance):

Based on the procedures performed, as described above, nothing has come to our attention to suggest that in the development of the Report, the Group has not taken into account the 10 United Nations Global Compact Principles in all material respects, as described in the respective table of the section titled "UN Global Compact Table" of the Report.

Responsibilities

The Group's Management are responsible for preparing the Report, and the information and statements within it. They are responsible for the identification of stakeholders and material issues, for defining objectives with respect to sustainability performance and for establishing and maintaining appropriate performance management and internal control systems from which reported information is derived.

Our responsibility is to carry out a limited assurance engagement and to express a conclusion based on the work performed for the agreed scope, as described above. We conducted our engagement in accordance with ISAE 3000. ISAE 3000 standard requires that we plan and perform the engagement to obtain limited assurance about whether selected aspects of the Report, for the period 1 January 2020 – 31 December 2020, are free from material misstatement. KPMG applies ISQC 1² and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the independence and other ethical requirements of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our assurance report is made solely to the Group in accordance with the terms of our engagement. Our work has been undertaken so that we might state to the Group and the Company those matters we have been engaged to state in this assurance report and for no other purpose. We do not accept or assume responsibility to anyone other than the Group for our work, for this assurance report, or for the conclusions we have reached.

KPMG Advisors Single Member S.A.



George Raounas,
Partner
Athens, June 17th 2021

² International Standard on Quality Control 1 (ISQC 1): Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, issued by the International Auditing and Assurance Standards Board.



25, ERMOU STR., 145 64 NEA KIFISSIA