



SUSTAINABLE DEVELOPMENT REPORT 2021



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MESSAGE FROM THE MANAGEMENT

2021 was a year of new challenges, both for the international geopolitical and financial scene and the daily life of societies.

In the aftermath of the health crisis, whose effects have been gradually fading, while still remaining resistant to long-term plans, new challenges have emerged for both businesses and humanity.

During 2021, further difficulties arised, with the appearance of the energy crisis, which has been evolved to one of the greatest energy challenges of the modern world / contemporary times. A crisis that has created rearrangements in the green taxonomy and changes in the energy mix of the European countries, which has derailed to some extent our international and national goals for a smooth energy transition.

On the other hand, 2021 was also a year of dynamic recovery for investments in Greece, which reached its highest levels in the last 30 years. This fact, combined with the €72 billion support, that Greece is expected to receive from the EU's long-term budget for 2021-2027 and the European recovery plan NextGenerationEU, creates significant opportunities for the entire Greek economy.

Guided by the vision of Global Energy Transition by 2030, despite the difficulties, we remained committed to the Sustainable Development Goals and the substantial contribution of the Group's actions to the environmental goals of Europe, and of our country, to achieve Climate Neutrality by 2050.

At the same time, we proceed with substantial changes to the Group's internal structure and operation. Changes that responded to the need of creating a new, sustainable development model but also to modernize the Group's practices in terms of innovation and digital transformation.

Our goal is to align ourselves with the demands/priorities of the modern era so that we, as a Group, can seize the opportunities in our segments of activities, but also substantially support the Greek economy and society.

In this context, the Group's Vision, Mission and Values were redefined and its business strategy was reset, focusing on strengthening its footprint in Construction, Concessions, Environment, Green Energy Production and Real Estate Development segments, with the aim of establishing a stable, sustainable growth rate, with benefits for all stakeholders.

At the center of this restructuring, the upgraded ESG Strategy and Sustainable Development Division became the key pillar of the new development model, setting the Group's mark for the future, with its commitment, inter alia, to sustainable development and modern corporate governance.

Following international best practices, the Group's sustainable development actions are fully aligned with its corporate values of meritocracy and equal opportunities, collaboration and excellence, achievement and efficiency, innovation, integrity and respect, encouragement and advancement, health and safety.

The analytical performance reporting procedure of the Group's companies on Sustainable Development key performance indicators through a new electronic platform was completed within 2021, in accordance with recognised international and national standards such as GRI, SASB, and the Athens Stock Exchange ESG Reporting Guide. This process allowed the collection of key quantitative data at a company and an operational level, with the aim of enhancing transparency and continuous improvement of the Group's ESG performance.

Based on the aforementioned findings, the Group's Sustainable Development strategy was redefined, and the new ESG priorities related to innovation and digital transformation, climate change and the promotion of the circular economy, the protection of employee health, safety and development, social responsibility and integrity, and business ethics were established.

E-ENVIRONMENT

The environmental footprint of the Group's activities for 2021 is the greatest proof of our commitment to environmental sustainability.

The Group's greenhouse gas (GHG) emissions decreased by 8% compared to 2020, while, through the production of 1,380 GWh of electricity from RES, the Group contributed to the prevention of emissions amounting to 2,666 thousand tonnes of CO₂ eq.

The waste treatment plants, operated by our environment segment, managed a total of 925,246 tonnes of waste, aiming to increase capacity by 470 thousand tonnes by 2025 (+55% compared to 2021).

In August 2021, the new project for the Upgrade and Operation of the Mechanical Recycling Plant of Ano Liosia and its conversion into a "Green Factory" was launched, while ELLAKTOR S.A. was included as the only Greek company in the Carbon Clean 200™ (Clean200) list of the 200 largest companies worldwide, based on revenues from green activities.

S-SOCIETY

For ELLAKTOR Group, respect, and equal opportunities at work is a non-negotiable priority. In 2021, the Group took actions in order to strengthen its corporate culture, establish a healthy and safe working environment and adopt its new core values, mission and vision. Assuring meritocracy, equal opportunities, inclusion, respect, development, health and safety of all employees are at the core of the Group's new philosophy and are implemented daily through continuous initiatives to update and strengthen these values.

Placing humans and society in our main priorities, ELLAKTOR Group continued to provide substantial support

to the local communities in which it operates, while proceeded with targeted social actions to further encourage and strengthen the culture of volunteerism in the Group.

G-GOVERNANCE

In 2021, Corporate Governance was substantially strengthened with a series of actions providing a clear position / message of the Group's strategy on transparency and regulatory compliance.

In this context, the Group established the Policy against Harassment and Violence at Work, the Code of Ethics, and the Code of Conduct for Business Partners. The approved Sustainability Policy incorporates the basic principles that must govern the Group's sustainable development strategy, in order to ensure that factors related to the Environment, Society and Corporate Governance (ESG) are integrated into the Group's business activity.

A four-member Sustainable Development Committee was established which aims to contribute to the Company's Board of Directors in strengthening the Group's long-term commitment to increase its positive impact on the economy, society and the environment, creating added value for all stakeholders.

There are many challenges on our way towards a healthy growth in which we ought to respond with flexibility if we want to transform these challenges in development opportunities, while giving essential meaning to the concept of green and sustainable business.

With the vision of creating a modern and sustainable world for all, ELLAKTOR Group is ready to implement projects that will modernize the country, accelerate the green transition and upgrade the quality of life of societies by promoting accessibility and safety, as we owe in a modern world.

On behalf of the Board of Directors of ELLAKTOR Group



George Mylonogiannis
Chairman of the BoD



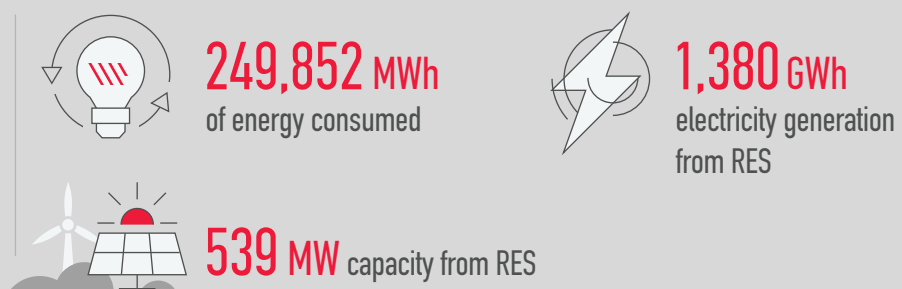
Efthymios Bouloutas
Chief Executive Officer

AT A GLANCE 2021

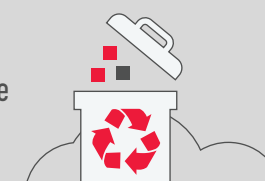
ELLAKTOR Group's Key Segments



E ENVIRONMENT



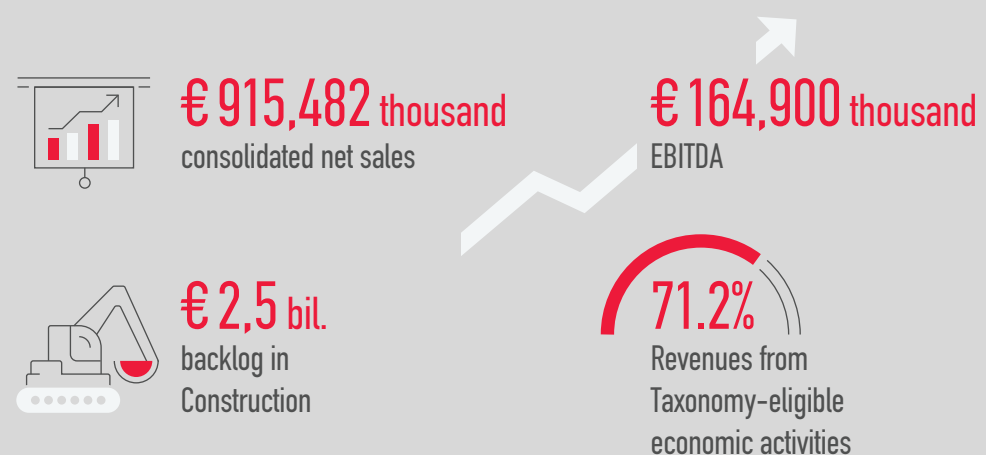
925 thousand
tonnes of third-party waste
under management in
Environment Segment's
facilities



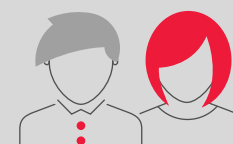
2,666 thousand tonnes
CO₂ eq. emissions prevented

68% of waste diverted from
disposal (D)*

S SOCIETY



7,296
employees



28,463 15minute
Health & Safety toolbox talks



€ 3,264 thousand
επενδύσεις στην τοπική κοινωνία



€ 181.7 mil.
employee benefits



47,704 hours
employee training



5 mil.
Smart Part visitors



G GOVERNANCE



94%
of supplies procured
from domestic suppliers



New
Sustainable Development Policy

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.

*Waste generated by Group's operation

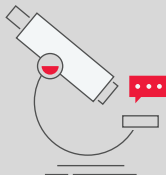
ELLAKTOR GROUP



Establishment of the Sustainable Development Committee and New Sustainable Development Policy



Development of a ESG New Strategy



Participation in 12 research projects



GROUP PRESENTATION

ELLAKTOR Group is one of the largest infrastructure groups in Greece and one of the leading in Southeastern Europe.

With an international presence in **22 countries** and a diversified portfolio of activities focusing on areas of Construction, Concessions, Environment, Renewable Energy Sources, and Real Estate Development, the Group lays the foundations and invests in the creation of a modern and sustainable world.

Combining its **70 years of history**, the experience and know-how of its **7,296¹ employees** and its innovative practices, ELLAKTOR Group operates with environmental and social responsibility, pursuing development with strict sustainability conditions, so that its projects lead to a substantial improvement of quality of life in the long term.

Its mission is to provide high-quality infrastructure, energy, and environmental projects and to promote the circular economy with innovative waste management solutions, enhancing its footprint in green energy production, and aiming to continuously create added value for all its shareholders, its employees, and the Greek economy and society.

The Group, which consists of **100 subsidiaries**, more than **15 affiliated companies** and approximately **135 joint ventures**, recorded a turnover of **€915.5 million** for the fiscal year 2021.

All Group companies, as well as the joint ventures, where the Group is a part of, are presented in the **2021 Annual Financial Report**.

¹ Including employees, regardless of their employment relationship, employed by companies and joint ventures of the Group (in which the Group companies hold more than 50% and/or which are managed by the Group), based in Greece, Germany, Cyprus, Qatar, Romania, and Jordan.

International Presence of ELLAKTOR Group

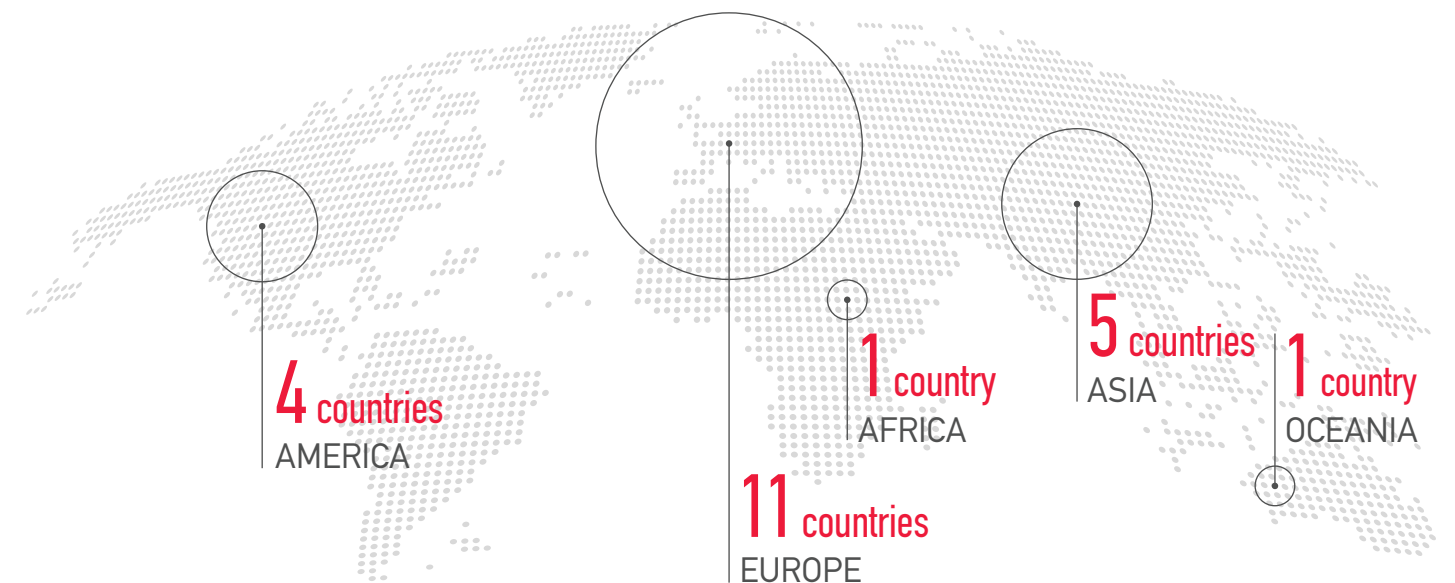
€915.5 million
turnover

Approximately
135 joint ventures

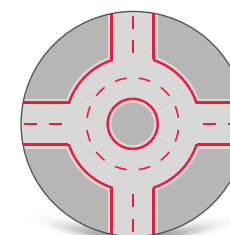
More than
15 affiliated companies

Operating in
5 continents & 22 countries

More than
100 subsidiaries



Key Segments



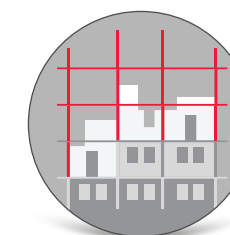
Concessions



Renewable
Energy Sources



Environment



Construction



Real Estate
Development

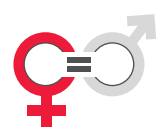
Vision

Our vision is to lead the way to a contemporary, innovative, safe, and sustainable future.

Mission

Leveraging our people's unique expertise, we deliver high – quality infrastructure, energy and waste management projects, we foster circular economy innovative solutions while enhancing our alternative energy footprint, creating value for our shareholders, our employees and the Greek Economy and Society.

Core Values



Meritocracy and Equal Opportunities

Foster ethics, meritocracy and equal opportunities in the workplace and respect diversity.



Collaboration and Excellence

Encourage team effort, collaboration, excellence.



Achievement & Efficiency

Be committed to high-quality work and the transparency and flexibility of business operation, seeking the continuous improvement of competitiveness.



Innovation and Best Practices

Invest in innovation, cutting-edge technologies and best practices, aiming at the continuous enhancement of operations.



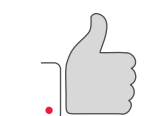
Integrity and Respect

Operate with transparency and environmental and social awareness, encouraging the respectful and dignified treatment of all people.



Health and Safety

Operate with the health and safety of our people as main priority.



Encouragement and Advancement

Invest in the know-how and the expertise of our people and support the process of continuous learning for their further development.

Main Activities

The Group is active in the field of infrastructure and specifically in the Concessions, Environment, Renewable Energy Sources, Construction and Real Estate Development Sectors.

Concessions

ELLAKTOR Group is active in the **Concessions segment** through its subsidiary, **AKTOR CONCESSIONS** which holds a leading position in concession projects in Greece, as it is the one that literally paved the way for major Concession Projects in the country by undertaking relevant contracts as early as the 1990s.

The Concessions segment possesses majority stakes in the largest and most modern motorways in Greece, while the vast and comprehensive experience of the Group's people over the years, allows it to cover the whole spectrum of concessions activities, from design, financing and construction, all the way to 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.

Important events

In 2021, the revenues from the Concessions segment stood at €233.3 million, compared to €202.4 in 2020, showing an increase of 15.3% or €30.9 million. This increase in revenues is mainly due to the increased traffic on Attiki Odos, due to the gradual lifting of the Government's containment measures to limit the spread of the COVID-19 pandemic.

With the gradual lifting of containment measures introduced by the Greek Government to limit the spread of the COVID-19 pandemic, traffic on Attiki Odos increased by 16.8% in the period January-December 2021, compared to the corresponding period of 2020. An upward trend compared to corresponding periods in 2020 was also recorded on the other highways.

On 1 January 2021, the Alimos Marina Concession was launched for a period of 40 years - with the right of mutual extension for another 10 years - with the aim of upgrading the Alimos Marina into one of the most modern marinas in the Balkans, with the implementation of a total investment of €100 million for its development with multiple added value. The Alimos Marina is the largest marina in the Balkans with 1,100 berths and nowadays operates as a

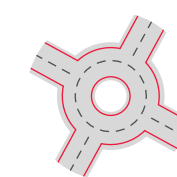
starting marina for a large number of small professional sailing yachts. It is strategically located in the southwest of Athens, 15km away from the city centre, 8km south of the Piraeus Port and 30km from the Athens International Airport EL. Venizelos, and it is serviced by a dense transport network of trams, buses and taxis. For AKTOR CONCESSIONS, the concession of the right to use, operate, manage and develop Alimos Marina is a strategic investment which affects and influences the entire Attica Region. Alimos Marina is part of the "Athenian Riviera", a reference point for residents of the wider urban area and visitors, as well as for owners of private and professional yachts, and is a landmark project for the wider area of Attica and especially for the Municipality of Alimos, through tourism development and the infrastructure it offers.

Further information on the outlook, risks and uncertainties of the Concessions segment is presented in the **2021 Annual Financial Report**.

2021 Review



€233.3 mil.
turnover



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



16.8%
increase in traffic on Attiki Odos compared to 2020



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

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.

Important events

The turnover of the RES segment for fiscal year 2021 amounted to €105.7 million compared to €93.9 million in 2020, marking an increase of 12.6% or EUR 11.8 million, which was unaffected by the consequences of COVID-19. Total installed capacity of the RES segment stood at 493 MW as at 31.12.2021. In addition, 1,616 MW of RES projects are in various stages of licensing, while an application for a Generation Certificate for 35 MW is still pending.

The electrical power generation attributed to the system reached 1,129 GWh in 2021, marking an increase of 8.4% compared to 2020, which is primarily due to an increase in installed capacity (+6.3%). The average capacity factor of 2021 stood at 26.1%, compared to 25.5% in 2020.

Further information on the outlook, risks and uncertainties of the Renewable Energy Sources segment is presented in the **2021 Annual Financial Report**.

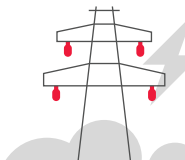
2021 Review



2nd largest
wind energy producer
in Greece



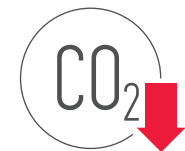
24 wind farms
in operation



493 MW
installed capacity



1,129 GWh
electricity generation
from RES



987 thousand
tons of CO₂ eq. emissions
prevented

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 green energy production, with over 20 years of success. The valuable know-how and expertise enables ELLAKTOR Group to offer integrated waste management solutions, including the design, construction, and operation of up-to-date waste treatment plants, as well as of alternative fuel production and biogas and biomass exploitation projects.

Main Group companies:

- HELECTOR S.A.
- STERILISATIONS S.A.
- APOTEFROTIRAS S.A.
- J/V HELECTOR S.A. - ARSI S.A.
- EDADYM SINGLE MEMBER S.A.
- SOLID WASTE RECYCLING S.A.
- BEAL S.A.
- J/V PRASINOUEMA
- OSNABRUCK GmbH
- HELECTOR CYPRUS Ltd

Important events

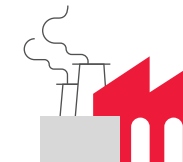
The turnover of the **Environment segment** for 2021 amounted to €115.1 million, compared to €101.9 million in the corresponding period in 2020, marking an increase of 12.9% or €13.2 million, mainly affected by the volume of incoming waste, the increase in the prices of recovered recyclable materials and the high Market Clearing Prices (MCP) through which part of the electricity production of the subsidiary **BEAL S.A.** is paid.

Further information on the outlook, risks and uncertainties of the Environment segment is presented in the **2021 Annual Financial Report**.

2021 Review



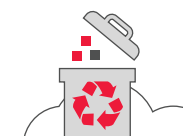
€115.1 mil.
turnover



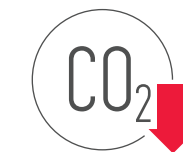
4 Biogas power plants
with a capacity of 37 MW



3 wind farms
with a total capacity of 7.8 MW



925,246 tonnes
of waste managed



1,679 thousand
tons of CO₂ eq. emissions
prevented

Construction

ELLAKTOR Group operates in the **Construction segment** through its largest subsidiary, **AKTOR**. With 70 years of experience in demanding infrastructure projects, profound specialisation in the latest technologies, and international activity, AKTOR provides a wide range of diversified services in construction, photovoltaic parks, quarrying activities, technical facilities management, and project management.

The portfolio of the Construction segment consists of motorways, railway projects, shopping centres, tourism and hotel units, health units, cultural centres, biological treatment projects, Olympic athletic complexes, natural gas pipelines and refineries, port projects, reconstructions, power plants, electromechanical projects, etc.

Main Group companies:

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

Important events

During the year 2021, the revenues from the Construction segment stood at €462.7 million, reduced by 7.3% compared to the previous year, in which revenues reached €499.1 million. The aforementioned reduction was due to the company's withdrawal from countries with negative economic return.

In terms of project implementation, emphasis was placed on the progress of Thessaloniki Metro works, the redevelopment of Faliriko Bay, as well as road construction and railway projects in Greece and Romania.

The Group has decided to focus geographically on Greece and Romania, an EU country, where the Group has accumulated experience and know-how and which has significant infrastructure project needs.

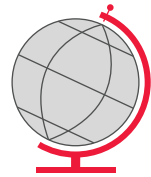
In addition, the Group is following a highly selective approach with regard to the pursuit of contracts in Qatar, where it has Facility Management service contracts (O&M). It is worth noting that in 2021 AKTOR and its subsidiaries signed new contracts amounting to €436 million in Greece and abroad.

Further information on the outlook, risks and uncertainties of the Construction segment is presented in the **2021 Annual Financial Report**.

2021 Review



€462.7 million
turnover



22 countries
of operations



€2.5 billion
total backlog*



€436 million
of new contracts in Greece
and abroad

*Includes projects under construction, signed contracts after 31.12.2021, as well as projects in which the Construction segment is the lowest-cost bidder.

Real Estate Development

ELLAKTOR Group's operation in the **Real Estate Development segment** comes through its subsidiary, **REDS**, one of the leading companies in the sector with activity in Greece and abroad. The company's business strategy focuses on the development of retail and entertainment centres and parks, residential complexes, and exhibition centres, as well as office buildings and mixed purpose green developments. 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. The company's portfolio consists of award-winning projects with international distinctions which seal in the best possible way its identity, philosophy, and quality of its work. REDS has built and operates the retail shopping Smart Park, while the New Alimos Marina, Heraklion Gournes, and Cambas Park projects are currently under development.

Main Group companies:

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

Important events

The Real Estate development segment recorded revenues of €7.6 million in 2021, compared to €6.8 million in 2020, marking an increase of 11.2% or €0.8 million.

Government decisions regarding the suspension of retail operations and decisions on the exemption from the obligation of tenants of commercial leases to pay rent amounting to as much as 100% for the months from January to May 2021, in addition to the exemption from the obligation to pay 40 % of rents for June 2021, affected the financial results of the segment given that REDS primary activity is the operation of the retail park "Smart Park". However, with the end of the COVID-19 restrictive measures, there was an acceleration in the growth rate of traffic through the "Smart Park", resulting in the turnover of retail stores reaching levels higher than those of 2019, showing a dynamic recovery.

The company REDS S.A. was declared successful bidder for the development of part of the former American base in Gournes, Heraklion, Crete. The project has been called the "Little Ellinikon", due to similarities with the investment (redevelopment of the old Ellinikon airport) on the coastal front of Athens. The tender competition was conducted by the Hellenic Republic Asset Development Fund (HRDH) through an electronic auction procedure. The property is located on the seafront and covers 345,567 square meters. It is located 13 km from the "Nikos Kazantzakis" Airport and 16 km from the city of Heraklion. The plan under consideration for Gournes foresees a number of developments, including a casino, a tourist accommodation complex, a conference and exhibition centre, shopping centers, a marina, a helipad and other facilities.

Further information on the outlook, risks and uncertainties of the Real Estate Development segment is presented in the **2021 Annual Financial Report**.

2021 Review



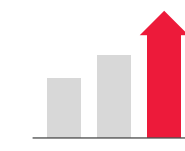
€7.6 mil.
turnover



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



5 million
Smart Park visitors

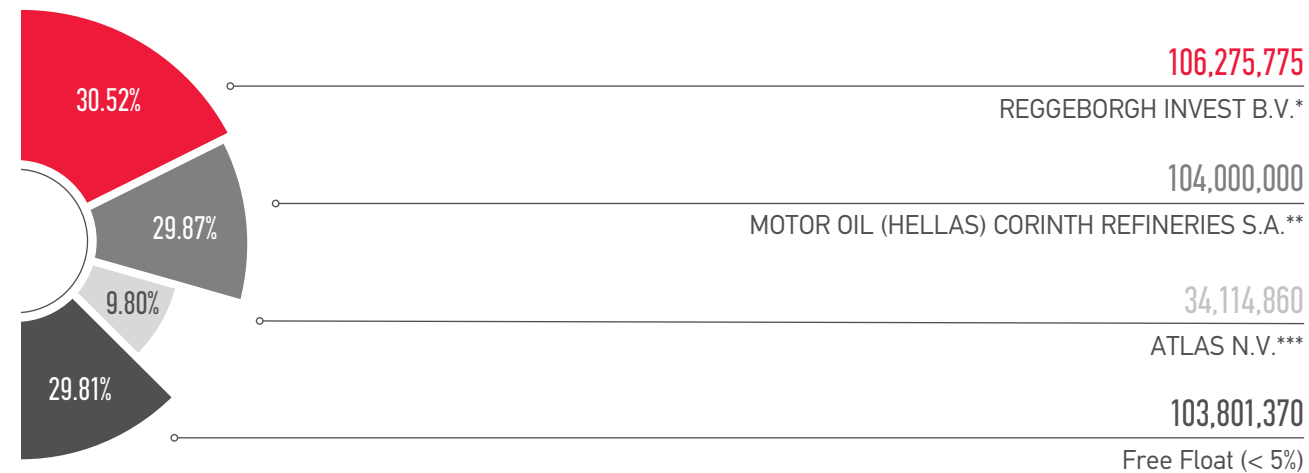


97%
commercial occupancy
of Smart Park

Shareholder Structure

In June 2022, the Company's share capital amounts to € 13,927,680.20, divided into **348,192,005** 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 "Construction & Construction Materials" sector.



In accordance with the last Notification of the obligated persons (Law 3556/2007). Last update 11.05.2022.

* REGGEBORGH INVEST B.V. is not controlled by any natural person or legal entity, in the sense of Article 3 of Law 3556/2007 and does not control any other undertaking holding directly or indirectly an interest in ELLAKTOR SA. REGGEBORGH INVEST B.V. acquired on 06.05.2022 a Call Option of 52,000,000 shares and corresponding voting rights in ELLAKTOR SA, representing 14.9343% of the voting rights. The option exercise/conversion period is 36 months starting from the day of the acquisition of the call option (i.e. 6 May 2022) and the expiration date on 06.05.2025. As a result of a potential exercise of the Call Option, REGGEBORGH INVEST B.V. holds 45.4565% voting rights (i.e. 158,275,775 common registered shares with voting rights) issued by ELLAKTOR S.A.. REGGEBORGH is not entitled to exercise the voting rights associated with the call option shares (52,000,000 shares) during the respective call option exercise period.

** The purchase of 104,000,000 shares and voting rights (i.e. 29.87% of the total voting rights of the Issuer) was made via OTC DVP transaction on 06.05.2022.

*** ATLAS NV is controlled by ATLASINVEST HOLDING B.V., which in turn is controlled by Mr Martialis Quirinus van Poecke.

Memberships in Associations and Networks

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

• Hellenic Federation of Enterprises (SEV)

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 the Group's Board of Directors is Vice-Chairman of SEV's Business Council for Sustainable Development, Board of Directors.

• Hellenic Network for Corporate Social Responsibility – 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 is a member 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 of 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 and AKTOR, as subsidiaries of ELLAKTOR Group, are represented by the Group in the international Organisation and are now members 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; ATTIKI ODOS has been a member since 2019, while AKTOR has been a member since 2021.

• Hellenic Association of Toll Road Network – HELLASTRON

ATTIKI ODOS, ATTIKES DIADROMES, and MOREAS S.A. 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.

HELLASTRON is a member of the European association ASECAP (European Association of Operators of Toll Road Infrastructures), which includes the national motorway operators of Europe. The aim of the organisation is to protect and develop the network of motorways

and road infrastructure in Europe by charging users (tolls) as a means to ensure the financing of their construction, operation, and maintenance. HELLASTRON is also a member of IBTTA (International Bridge, Tunnel and Turnpike Association), the worldwide association of the owners and operators. In addition, HELLASTRON is a member of the Geneva-based International Road Federation (International Road Federation), which aims to develop safe and modern road infrastructure worldwide.

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

HELECTOR is a member of the Board of the Federation of Recycling and Energy Recovery Industries and Enterprises (SEPAN), which 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 country's sustainable development.

• Panhellenic Association of Environmental Protection Companies (PASEPPE)

HELECTOR 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. Its purpose is to promote science and research in the wind energy sector, 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.

The HELECTOR's subsidiaries APOSTEIROSSI S.A. and APOTEFROTIRAS S.A. are registered in the "Association of Health Waste Management Enterprises" (SEDYA) which concerns health interest bodies for the implementation of legislation on waste management from sanitary units.

In addition, “Attiki Odos S.A.” and “Attikes Diadromes S.A.” participate in the Association of S.A. & Limited Liability Companies (SAE), the Athens Chamber of Commerce and Industry (ACCI), the IBTTA (International Bridge, Tunnel and Turnpike Association), and the IRF (International Road Federation). “Attikes Diadromes S.A.” chairs the IRFGeneva Programme Centre for the period from May 2019 to May 2022.

Lastly, “Attiki Diadromes S.A.” is a member of major international organisations, such as the USA TRB (Transportation Research Board of the National Academies), ERTICO-ITS Europe, while also collaborates with Greek organisations such as the “Panos Mylonas” Road Safety Institute, the Hellenic Institute of Transportation Engineers, the T.S.I. (Telecommunication Systems Research Institute), ITS Hellas, the HICS (Hellenic Institute of Customer Service), etc.

BUSINESS MODEL

At ELLAKTOR Group, the active contribution and effective promotion of sustainable development are placed at the core of its operational planning and the activities of its business segments. Ensuring a safe and fair working environment, providing effective support for the economy and local communities, and reducing the impact of its environmental activities are the Group’s basic principles. These commitments, a key guide for the fulfilment of the Group’s mission, are expressed not only through the modern infrastructure projects that for decades upgrade the quality of people’s lives, but also via the environment and energy projects that promote the circular economy and energy production through alternative and renewable sources, while creating added value for all Group’s stakeholders.

Strategy

ELLAKTOR Group’s business strategy focuses on strengthening its footprint in the Construction, Environmental Concessions, and Green Energy Production segments. Focusing on the use of innovative practices and modern technologies, the Group aims to create sustainable-green and secure infrastructure projects for the people and the environment, and to produce alternative energy sources to respond to the need for protection against Climate Change and for the transition to Green forms of energy.

Sustainable Development Policy

ELLAKTOR Group promotes circular economy with innovative waste management solutions, while enhancing its footprint in green energy production. Following best international practices (for example, the adoption of the United Nations 2030 Agenda for Sustainable Development, materiality analysis that identifies the needs and expectations of the Stakeholders in relation to the group’s operation) and recognised standards (such as, the Global Reporting Initiative (GRI) guidelines, the Global Compact principles, the Sustainability Accounting Standards Board (SASB) guidelines, the ESG Reporting Guide of the Athens Stock Exchange), the Group’s sustainable development actions are fully aligned with its corporate values, Meritocracy & Equal Opportunities, Collaboration & Excellence, Achievement & Efficiency, Innovation & Best Practices, Integrity & Respect, Encouragement & Advancement, Health and Safety.

In March 2022, the Group’s revised **Sustainability Policy** was approved, which aims to establish the basic principles that should govern the Group’s sustainable development strategy to ensure that factors related to the Environment, Society and Corporate Governance (ESG) are integrated into the Group’s business activity, with a view to creating value for its Stakeholders.

Sustainable Development Pillars

The ESG Strategy & Sustainable Development Division was established, at Group level, and its main aim and responsibility, inter alia, is the development of a sustainable development strategy, social investment strategy and environmental-energy management for the Group and all its companies. 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.

In this context, the ESG Strategy & Sustainable Development Division operates as the strategic planning centre submitting proposals to the Board of Directors regarding the Group’s Sustainable Development Policy, prepares the Group’s Annual Sustainable Development Report and monitors sustainable development key performance indicators with the aim of continuously improvement.

Recognising the importance of the issues it manages, the ESG Strategy & Sustainable Development Division reports to the Group’s Strategy Division, while the overall oversight of sustainable development issues is carried out by the ESG Committee, whose establishment was completed and approved by the Board of Directors on November 2021, while this Committee held the first meeting in 2022.

The detailed tracking of the Group companies’ performance on Sustainable Development issues continued in 2021, in accordance with recognised international and national standards such as GRI, SASB and the ESG Reporting Guide of the Athens Stock Exchange), through a new electronic platform, with which key quantitative data on sustainable development issues at company, project/activity level were collected. The Group’s goal is to enhance transparency and continuously improve its performance on issues that fall within the recognised key strategic pillars of sustainable development.



ELLAKTOR S.A. responds to the questions from sustainable development analysts and its performance is evaluated by independent organisations, such as the ISS ESG, Bloomberg, S&P, Refinitiv, and Sustainalytics.

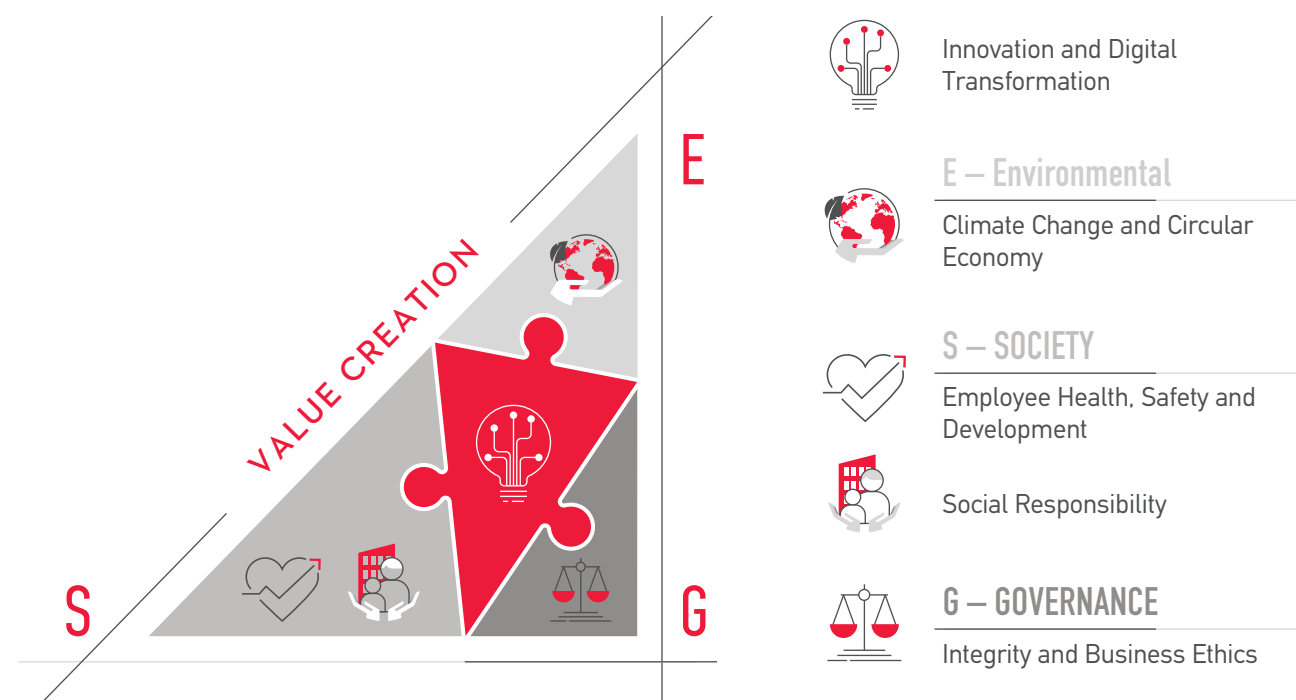
In addition, ELLAKTOR S.A. is included in the **ATHEX ESG** index of the Athens Stock Exchange. This index monitors the stock market performance of ATHEX listed companies that adopt and promote their environmental, social and corporate governance (ESG) practices.

Moreover, ELLAKTOR S.A. is the only Greek company included in the Carbon Clean 200™ (Clean200) list of the

200 largest companies worldwide, based on revenues from green activities. The **Clean200** list is published annually by Corporate Knights, a company specialising in the analysis of responsible entrepreneurship and sustainable development issues.

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.

The following strategic pillars have been identified at Group level:



In 2021, ELLAKTOR Group redefined itself into a modern Group, diversifying its activities and redesigning its operation in the light of the transition to the new digital era, while, at the same time, constantly exploring the possibilities for more efficient use of technology in its activities.

Innovation and Digital Transformation are at the heart of its strategy and act as a connecting link to equip the Group with modern tools to address more effectively future challenges in the above strategic pillars.



At ELLAKTOR Group, the active contribution and effective promotion of sustainable development are placed at the core of its operational planning

ELLAKTOR Group Business Model


SUSTAINABLE DEVELOPMENT PRIORITIES

INTEGRITY AND BUSINESS ETHICS

- We adopt best practices in business ethics, corporate governance and risk management.
- We urge our associates to adopt responsible business practices.

EMPLOYEE HEALTH, SAFETY AND DEVELOPMENT

- We support our employees, by providing a safe working environment, where they can develop and grow.

CLIMATE CHANGE AND CIRCULAR ECONOMY

- We embed the principles of circular economy throughout our entire activity.
- We share the global and local goals and initiatives for the transition to a low carbon economy by reducing the greenhouse gases emissions that arise from our activities and we invest in the activities of the Group that contribute to the mitigation of climate change.

SOCIAL RESPONSIBILITY

- Our primary goal is to operate responsibly in relation to the community within which we operate, in order to increase our positive impact and return value to it.

INNOVATION & DIGITAL TRANSFORMATION

- We reinvent ourselves as a modern Group of companies by diversifying our activities.
- We redesign the way we operate, based on the transition to the new digital era.
- We explore opportunities for a more efficient use of technology in our activities.

MATERIALITY ANALYSIS

ELLAKTOR Group conducts a materiality analysis every two years, based on its relevant policy. The most recent materiality analysis was implemented in 2020 with the participation of internal and external stakeholders. In 2021, the results of the previous materiality analysis were preserved, while the next analysis and update of the material issues is planned for by the ESG Strategy & Sustainable Development Division, in collaboration with the ESG Committee.

The basic steps of the materiality analysis carried out by the ELLAKTOR Group in 2020, in accordance to the GRI Standards, are briefly described below.

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 peer companies.
- Publications from the last three years at the time of the analysis (2018-2020), related to the ELLAKTOR Group and its subsidiaries.
- Internal documents (e.g. policies, strategies, management systems, operating standards, etc.).
- UN Global Sustainable Development Goals (SDGs).
- Principles of the United Nations Global Compact.

Evaluation and Prioritisation

Senior members of ELLAKTOR Group's Management were asked to evaluate and prioritise 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; and
- industry's key priorities and future challenges.

Moreover, in order to identify the needs and expectations of stakeholders, representatives of all Group stakeholders, with the exception of Shareholders and Bond holders, 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

E – Environmental

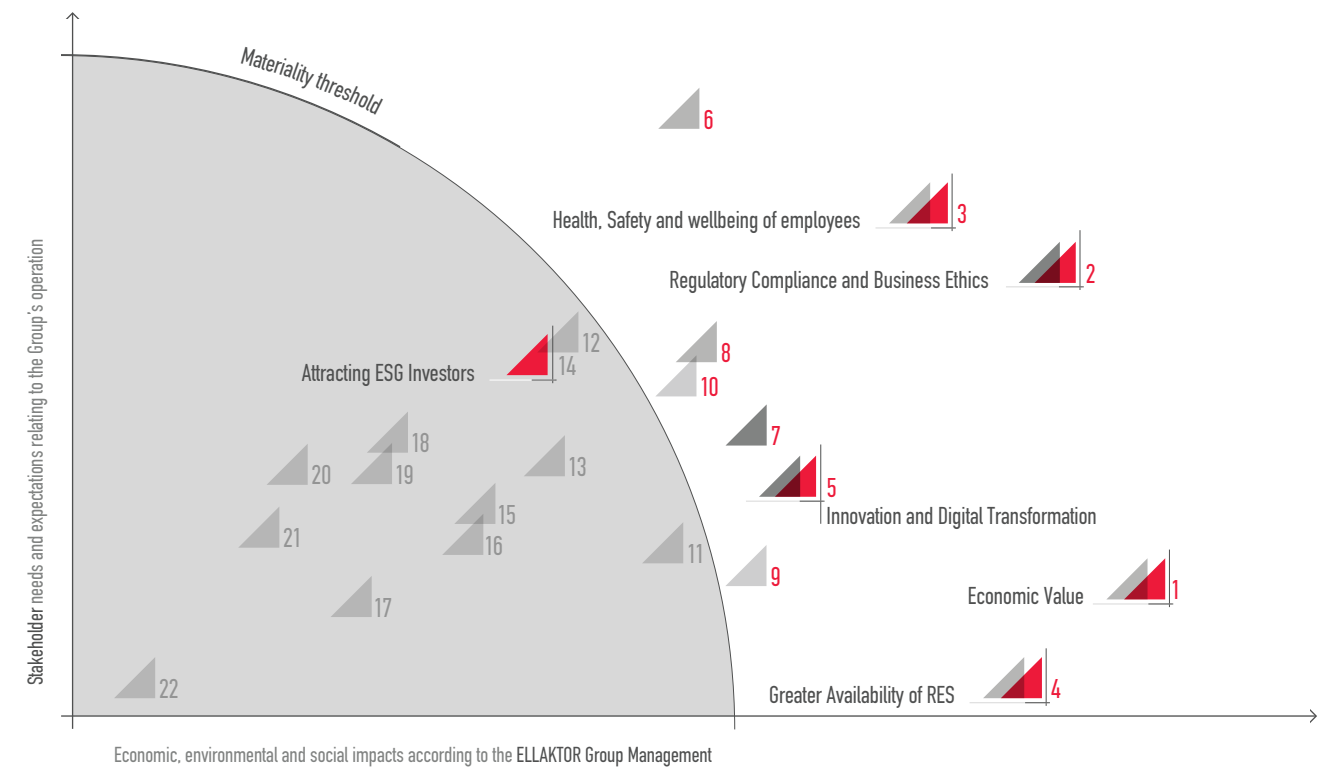
4. Contribution to greater availability and reliability of renewable energy sources and to energy transition and the decarbonisation of electricity generation.
9. Reducing consumption of non-renewable energy sources and improving energy efficiency, as well as reducing and offsetting greenhouse gas emissions 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.

S – SOCIETY

1. Creation and distribution of economic value.
3. Safeguarding occupational health, safety and wellbeing of employees (including subcontractors' employees).
6. Safeguarding health, safety and positive experience of end users and structural integrity and safety.
8. Safeguarding human rights at the workplace.

G – GOVERNANCE

2. Safeguarding regulatory compliance and business ethics.
5. Reinforcing innovation and digital transformation.
7. Ensuring business continuity and emergency preparedness.



Other Material topics

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.

SUSTAINABLE DEVELOPMENT GOALS

ELLAKTOR 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

The Group's contribution

3 GOOD HEALTH AND WELL-BEING



ELLAKTOR 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.

4 QUALITY EDUCATION



The Group's main priority is to continuously strengthen the training programmes of its employee, either through internal training programs or in collaboration with external bodies, with the aim of their spiritual development. In addition, with the aim of creating equal conditions for education and access to scientific knowledge, the Group joins forces with the Bodossaki Foundation to support the science labs of 12 public lower secondary schools in the areas where it operates, through the program "Experience Science".

5 GENDER EQUALITY



ELLAKTOR Group takes appropriate measures to ensure that there is no discrimination against women. It provides equal opportunities in the recruitment, development, and training of all employees, regardless of gender. The Group supports women in leadership positions and ensures their participation in governance and decision-making groups at all levels.

Proof of the Group's commitment to gender equality is the increase in the number of women on the Group's Board of Directors, while there has also been an increase in the percentage of female employees, as well as in the female employees, who are in the top 10% of employees by total compensation for 2021.

Sustainable Development Goals

The Group's contribution

6 CLEAN WATER AND SANITATION



ELLAKTOR Group consumes water in activities related to hygiene purposes, irrigation, waste washing and treatment needs. In order to avoid wasting water recourses, the Group implements methods of reusing treated water, collecting rainwater, while at the same time conducts frequent analyses on the quality of wastewater which is produced by its waste treatment plants.

7 AFFORDABLE AND CLEAN ENERGY



ELLAKTOR Group is active in the field of Renewable Energy Sources (RES) and contributes to the mitigation of the impact of climate change and access to cheap and clean energy for all, emphasising the development, construction and operation of wind farms, as well as the utilisation 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.

8 DECENT WORK AND ECONOMIC GROWTH



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, part of which it distributes to society. It creates mutually trusting relationships and supports the local communities in which it operates.

In parallel, aiming at the engagement and the well-being of employees, as well as the creations 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 or physical ability, as well as the selection of personnel using meritocratic and reliable methods.

9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



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, capitalising on the benefits of the internet, digital media and new technologies. It uses technology and participates in research programs, to optimise its operation as well as modernise its projects.

Sustainable Development Goals

The Group's contribution

11 SUSTAINABLE
CITIES AND
COMMUNITIES

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 relating 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.

12 RESPONSIBLE
CONSUMPTION
AND PRODUCTION

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 adopts measures to reduce and effectively manage the waste generated from its operations and aims at the rational management of resources.

13 CLIMATE
ACTION

ELLAKTOR Group, supporting the national effort for the transition to a low carbon economy and recognising the positive opportunities of the RES market, is active in this sector. It also aims to reduce its consumption of energy from non-renewable sources.

15 LIFE
ON LAND

ELLAKTOR 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. In addition, it takes into consideration the specific environmental requirements of projects or activities in areas neighboring to sensitive regions and monitors protected species (flora and fauna).

16 PEACE, JUSTICE
AND STRONG
INSTITUTIONS

ELLAKTOR Group seeks to conduct its business transparently and in accordance with the highest standards of Business Ethics. To this end, it implements an Integrity Compliance Program that incorporates an Anti-Bribery Management System as well as the Talk2Ellaktor, in which anonymous reports can be submitted. In parallel, ELLAKTOR Group actively participates in organisations and initiatives that aim to promote sustainable development.

Sustainable Development Goals

The Group's contribution

17 PARTNERSHIPS
FOR THE GOALS

Achieving the sustainable development agenda requires partnerships between governments, the private sector and civil society. ELLAKTOR Group and its subsidiaries are members of many organisations and networks (SEV Business Council for Sustainable Development, CSR Hellas) with which they cooperate closely to support actions that promote the achievement of the Sustainable Development Goals.



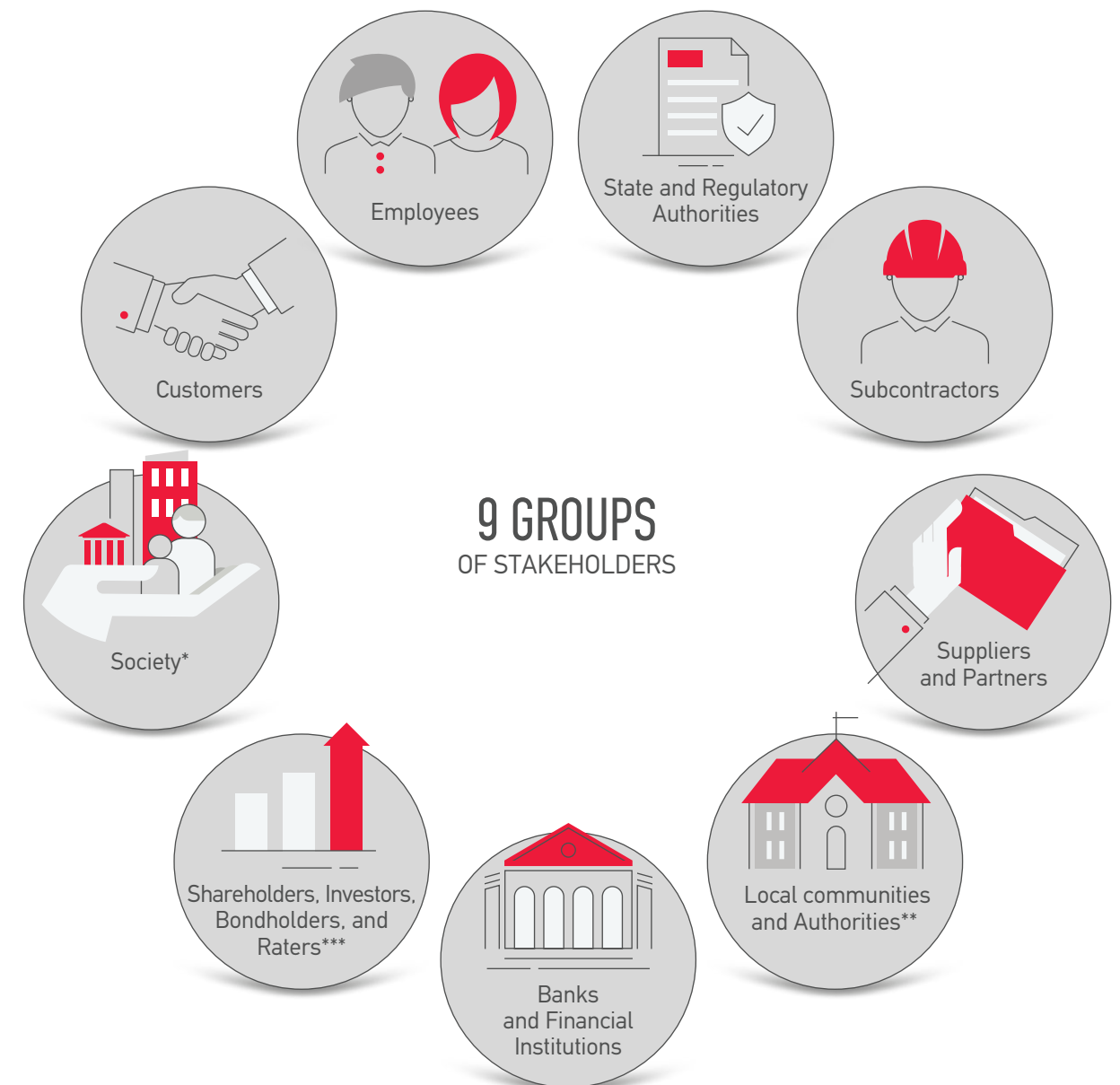


The main concern is to establish mutual trust and constructive cooperation with all stakeholders

COMMUNICATION WITH STAKEHOLDERS

For ELLAKTOR Group, the systematic and essential two-way communication with its stakeholders is the basis for the evaluation and planning of its actions and practices, as well as for addressing everyday challenges. The Group recognises as its stakeholders those groups

that directly or indirectly affect and are affected, by its activity. Stakeholders belong either to the Group's internal environment (shareholders, bondholders, employees), or external environment (suppliers, customers, business partners).





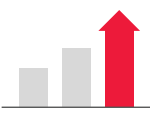

*AMKE (Civil Non-Profit Company), NGOs, civil society organisations






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

***ESG performance assessment bodies

At ELLAKTOR Group, the key concern is to establish mutual trust and constructive cooperation with all stakeholders, respecting the expectations and requirements of each group. In this context, the Group has established distinct channels of communication with each stakeholder group,

as presented in the table below. In addition, the Group invites its stakeholders to participate in the evaluation surveys on the material topics of sustainable development, the results of which contribute to the shaping of the Group's strategy.

Stakeholders	Key Requirements	Means of Communication
Employees 	<ul style="list-style-type: none"> Employees want to work in a healthy and safe environment, to be remunerated with a competitive salary, enjoy advancement opportunities within the Group, and to be treated with respect and meritocracy. They also want to know the Group's activities and their development. 	<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.
Customers 	<ul style="list-style-type: none"> Customers wish to have excellent cooperation with the Group in all sectors and to receive high-quality projects and services according to the agreed specifications and timelines. 	<ul style="list-style-type: none"> Direct communication through the Responsible person for each project/area of activity on a consistent basis and as needed by customer.
Shareholders, Investors, Bondholders, and ESG rating agencies 	<ul style="list-style-type: none"> They are interested in the Group's profitability, business developments in its areas of operations, and 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, social media, and the Media, as well as annually through the Group's Sustainable Development Report. Continuous Communication with the Investor Relations Division of the Group as well as with the ESG Strategy & Sustainable Development Division. Meetings with the Management and Financial Division of the Group ad hoc depending on the needs that arise.
Subcontractors 	<ul style="list-style-type: none"> They wish to have a consistent, profitable, and long-term cooperation with the Group in all areas. Moreover, they want their employees to work in a safe environment. 	<ul style="list-style-type: none"> Direct communication through the Site Managers of each activity, continuously and as needed.

Stakeholders	Key Requirements	Means of Communication
Banks and Financial Institutions 	<ul style="list-style-type: none"> The banks with which the Group cooperates, wish to have timely updates on financial results 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 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 Management and Financial Division of the Group, ad hoc depending on the needs that arise.
Local Communities and Authorities 	<ul style="list-style-type: none"> Local community members and local authority officials (local media, local NGOs, local civil society bodies) in the areas where the Group operates are interested in employment opportunities, as well as in the activities of the Group on issues of common interest such as the protection of the environment and social support. 	<ul style="list-style-type: none"> Constant communication with local Project Managers depending on the needs, as well as annually through the Group's Sustainable Development Report.
State and Regulatory Authorities 	<ul style="list-style-type: none"> They are interested in the responsible and lawful operation of the Group, environmental protection, social actions, the respect and protection of employees' rights and Occupational Health and Safety. 	<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. Direct communication through the Project Managers of each activity, and through meetings with Management, ad hoc depending on needs.
Society 	<ul style="list-style-type: none"> Society's members (media, NGOs, local civil society organisations) wish to be up-dated on any change of the Group's Sustainable Development activities, the financial, environmental and social aspects, and the Group's business developments and activities. 	<ul style="list-style-type: none"> 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 ESG Strategy & Sustainable Development Division, in regards to NGOs and civil society organizations depending on needs.
Suppliers and Partners 	<ul style="list-style-type: none"> Suppliers and partners wish to have a consistent, profitable, and long-term cooperation with the Group in all areas. 	<ul style="list-style-type: none"> Direct communication through the Procurement Managers of each activity, ad hoc depending on needs.

GROUP'S ESG STRATEGY

In 2021, the Group evaluated and redefined its strategic priorities and targets. In this context, the Sustainability Policy was updated and became the foundation on which the design of the Group's new ESG strategy was based.

The new ESG Strategy was approved by the ESG Committee and a plan for short, medium, and long-term actions to achieve these goals was planned. The Group's Strategic Priorities and Action Plan are presented in the table below.



ENVIRONMENT



CLIMATE CHANGE AND CIRCULAR ECONOMY

Targets



Reduction of greenhouse gas emissions

Action Plan

- Investments in RES and energy storage projects.
- Total Scope 3 emission footprint.
- Preparation and start of Implementation of a roadmap towards zero greenhouse gas emissions by 2050.
- Collaboration in research projects for developing CO₂ capture technologies.
- Reduction of the intensity of direct emissions (Scope 1) 10%* compared to 2020.
- Reduction of the intensity of indirect emissions (Scope 2) 20%* compared to 2020.
- 2050 zero greenhouse gas emissions.

*Possible rate adjustment according to the results of the roadmap.

Short-term targets
(1-3 years)

Medium-term targets
(4-7 years)

Long-term targets
(8-10 years)

Targets



Contribution to circular economy

Action Plan

- 80% waste* diverted from disposal.
- 90% waste* diverted from disposal.
- Increase in the number of treatment plants to manage an additional 470,000 tn of waste.
- Achievement of zero waste* to landfill to by 2028.

*Waste resulting from the Group projects' operation.



Addressing Climate Risks

- Design of a Climate Risk Roadmap and Management Program (TCFD).



Protection and conservation of biodiversity

- Establishment and implementation of a program to protect and conserve biodiversity.
- Training & Informing the Local Society on biodiversity issues. Adoption of an endangered species that is adjacent to a Group project/activity.



SOCIETY



EMPLOYEE HEALTH, SAFETY AND DEVELOPMENT

Targets



Strengthen Health & Safety (H&S) Culture to achieve zero accidents

Action Plan

- 10 hours on average of training per employee in H&S issues.
- Digitization of "Safety Pass" tool for 100% of employees (training, certificate of suitability, legalization documents).

Targets

Action Plan






Strengthen Health & Safety (H&S) Culture to achieve zero accidents

- Development of a digital application for recording near-misses, unsafe situations and actions, monitoring corrective actions and awareness campaign. 
- Safety Leadership Program. 
- Development of initiatives: Safety forums, Safety Champions, thematic awareness campaigns & rewarding good practices in all Group's projects and activities. 
- 20 hours on average of training per employee in H&S issues. 
- Creation of an H&S Training Academy in collaboration with Institutes, Technical Universities, and Universities. 
- Digitization of "Safety Pass" tool for 100% of subcontractors' employees (training, certificate of suitability, legalization documents). 







Well-being


- Design and implementation of a holistic improvement program for the Group's employees. 
- Online anonymous psychological support line. 
- Systematic events for the development of relations between employees and their families. 




Enhancing diversity

- Diversity & Inclusion Policy. 
- Program for the enhanced inclusion of vulnerable groups through recruitment. 
- Design and implementation of Human Rights Due Diligence. 

 Short-term targets
(1-3 years)

 Medium-term targets
(4-7 years)



 Long-term targets
(8-10 years)

Targets

Action Plan








Enhancing diversity

- Women's Empowerment Program. 
- Zeroing the pay gap for the same Grade. 



Training & Evaluation

- 20 hours on average of training per employee. 
- Training of all employees in key thematic areas. 
- Leadership training program for Managers. 
- Maintaining an average of over 25 hours of training per employee. 
- Application of "360 Feedback" evaluation. 


SOCIAL RESPONSIBILITY

Targets

Action Plan





Strengthening Society & improving the response to its needs and expectations

- Creation of a communication channel for dialogue and consultation (e.g., workshops) & Creation of an Annual Donations-Sponsorship Plan. 





Strengthening volunteerism

- Increase in employee voluntary actions compared to 2020. 
- Permanent cooperation with Organisations and Institutions. 




Enhancement of the interaction with Stakeholders

- Stakeholder opinion survey every 2 years. 
- New channels for direct communication with stakeholders. 



Zero non-conformities in quality issues

- Continuous reduction of the percentage of reworks in relation to turnover compared to 2021. 



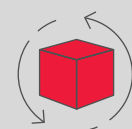
GOVERNANCE



INTEGRITY AND BUSINESS ETHICS

Targets

Action Plan



Improving the ESG performance of business partners with emphasis on the supply chain

- Evaluation and rating of suppliers and subcontractors using ESG criteria.
- Development of action plans to improve the ESG performance of suppliers and subcontractors.
- Extension of Evaluation and rating to business partners with ESG criteria.
- Follow-up on action plans to improve the performance of business partners.



Strengthening the Anti-Bribery System

- Creation of courses relevant to bribery issues on the e-learning platform and training employees who have access.



Strengthening the Group's Integrity framework and shielding processes to maintain zero confirmed incidents of corruption

- Development and implementation of a Business Partner Due Diligence framework on Business Ethics and Integrity.
- Integrity clause in all contracts with business partners.
- Training the Group's Critical Business Partners on the Business Partner Code of Conduct.
- Training the Group's non-critical Business Partners on the Business Partner Code of Conduct.

Targets



Adoption of good Corporate Governance practices

Action Plan

- Certification of the ELLAKTOR Corporate Governance System in accordance with ISO/IEC 37000:2021.

ESG



INNOVATION AND DIGITAL TRANSFORMATION

Targets

Action Plan



Leveraging innovative technological practices and opportunities

- Gradual transition of 70% of the Group's systems to a Cloud Server.
- Installation and implementation of advanced technologies, such as Internet of Things (IoT) and smart reporting using Artificial Intelligence, in production units for the most efficient management of machines, tools, and people.



Optimisation of operation and development of products and services

- Continuous increase in participation in research programs.

Short-term targets
(1-3 years)

Medium-term targets
(4-7 years)

Long-term targets
(8-10 years)

INNOVATION AND DIGITAL TRANSFORMATION

INNOVATION

ELLAKTOR Group is being redefined into a modern Group, diversifying its activities and redesigning its operations, as led by the transition to the new digital era. 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 optimization 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.

Concessions Segment

The Concessions segment participates in 6 research projects through the companies ATTIKES DIADROMES and MOREAS. Since September 2018, ATTIKES DIADROMES has been participating in two research projects implemented under the "RESEARCH - CREATE - INNOVATE" initiative, the MANTIS and ODOS 2020 projects, co-funded by the European Union and Greek national funds through the Operational Program "Competitiveness, Entrepreneurship & Innovation" (EPAnEK).

MANTIS (Multiservice Capable Intelligent Transportation Systems) is a three-year research project, which aims to design a comprehensive framework for the development of heterogeneous applications in intelligent transport systems and implementing and demonstrating driver assistance system towards improvement of road transport. In recent years, all vehicles are equipped with a variety of sensory instruments, providing this collected data via processing units and customized interfaces. MANTIS develops innovative applications, with a view to enable transport infrastructure and fleet management centers to monitor and track environmental conditions or extraordinary events. The project is due to be completed in 2022.

The "ODOS 2020" project aims to introduce an innovative technological solution that, through the use of the Internet of Things (IoT) and infrastructure to Vehicle (I2V) communication technologies, will implement collaborative applications in the field of Intelligent Transport Systems (ITS), contributing significantly to increased road safety and safe infrastructure maintenance. The integrated technological solution will be aimed at all types of vehicles and will require zero to minimum vehicle equipment. The proposed solution is based on the integration of a micro- and nano-sensorial networks, embedded in strips markers on the road surface. The project is due to be completed in 2022.

In addition, 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.

In addition, since 2021 the company ATTIKES DIADROMES has been participating in two European research projects that are part of the Horizon 2020 program. In more detail, the **PRECINCT** project ("Preparedness and Resilience Enforcement for Critical Infrastructure Cascading Cyberphysical Threats and effects with focus on district or regional protection") focuses on the EU's critical infrastructures, which are increasingly at greater risk from physical cyber-physical attacks and natural hazards. PRECINCT aims to connect private and public entities that are Critical Infrastructures. The project started on 1/10/2021 and has a 2-year duration, with the participation of 40 companies/entities. The pilot applications in Greece will be at a simulation level for AO, AIA E.Venizelos, and Attiko Metro.

Equally, **FRONTIER** ("Next generation traffic management for empowering CAVs integration, cross-stakeholders collaboration and proactive multi-modal network optimization"), includes the participation of a total of 18 companies and organisations from Europe and aims to provide integrated traffic management strategies of the future, taking into account new types and modes of transport with automated vehicles, the minimization of pollution and bottlenecks, the reduction of accidents and the need to reduce travel costs for all users. To this end, autonomous driving and traffic management systems will be developed, as well as simulation models that will provide optimal solutions to the system. There will also be pilot tests with simulations in Attiki Odos, Oxford, and Antwerp.

Lastly, MOREAS has, since 2012 been participating in the NTUA (Road Construction Laboratory) research program entitled "Development of a plan for monitoring the functional and structural condition of road surfaces".

RES Segment

The RES segment participates in two research projects. The "EnAuSi Wind Turbine" research project seeks to design an energy-efficient Construction Response Data Logging and Transmission System, which will include piezoelectric Sensors and has been included in the State Aid Action 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 optimization of its position on the blade and to build a prototype and use it successfully. An additional objective is the expansion of the system, with minor modifications, to a wide range of structures. The project is in the final stage of the experimental setup and the installation of the system on a wind turbine and its start-up is expected in the coming months, after consultation with the manufacturer.

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 project is at the stage of final commissioning and test charges, and discharges of the batteries are carried out, through which the settings and communications between the system controllers, the data measurement points of the H.V. Network and the Battery Control and Operation System.

Environment Segment

The Environment segment participates in two research projects which are included in the EPAnEK "RESEARCH - CREATE - INNOVATE". The research project "Hybrid model for landfill leachate treatment combining the use of Advanced Oxidative Anti-Pollution Processes (AOPs) and membrane technology", with the acronym "UV-LEACH", started in 2020 and is implemented in collaboration with the Aristotle University 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, 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.

Construction Segment

The Construction segment sector participates in two research projects through the maintenance and operation of wastewater treatment plants.

At the wastewater treatment plant in Kalochori, Thessaloniki, a research project entitled: “Biogas upgrade with simultaneous recycling and utilisation of carbon dioxide to optimise anaerobic sludge treatment” with the acronym “BIOGASUP” is being implemented in collaboration with the Hellenic Agriculture Organisation – Dimitra (ELGO-DIMITRA). The research project is implemented within the framework of the National Action “Research - Create - Innovate (2nd Cycle)”.

“BiogasUp” aims to holistically explore an innovative system of simultaneous biogas upgrading using inorganic membranes and increasing the quantity of biogas produced through recycling and utilisation of waste CO₂ for sludge pretreatment.

The project has a duration of 30 months and consists of 5 Work Packages (WP). In summary, existing commercial biogas upgrading and pretreatment systems implemented at both national and international level will be mapped in WP1. The aim is to identify the most attractive technologies for upgrading and biomass pretreatment methods using CO₂, so they can be further investigated.

During MP2, after the necessary market research into the supply of commercially available membranes that can be effectively applied to CO₂ separation, a series of laboratory tests will be carried out, including evaluation and comparison of polymeric and ceramic membranes and the examination of their performance in terms of removing CO₂. At this stage, the design and construction of the corresponding membrane arrangement will also take place.

Laboratory experiments will be carried out during MP3 aiming at finding the optimal method of sludge pretreatment using CO₂. At the same time, the reliability of the biogas upgrading system in continuous operation reactors will be evaluated. Lastly, the organisational structure of the microbial community and the changes in the relative abundance of microorganisms will be characterised in order to draw useful conclusions that will contribute to the optimisation of the process.

The research results obtained from MP2 and MP3 will be verified under pilot conditions in MP4 using a pilot scale reactor and a pilot biogas upgrade system. The pilot reactor will be fed with a real pretreated substrate from

the Thessaloniki Sewage Treatment Plant under optimal operating conditions as defined in MP3. To assess the operation and reliability of the upgrading system, a bypass will be created at the biogas plant, so that part of the biogas produced (e.g., 1 m³ biogas/h) is vented into the upgrading column. The upgraded biogas will be vented into the Heat Power Cogeneration System. At all stages of the pilot implementation, input and output data will be obtained for the techno-economic and environmental analysis to be carried out in MP5.

“BioGasUp” aims to develop and optimise renewable energy production technology from biomass, focusing on the production of high value second-generation biofuels (biomethane) thus opening new horizons in the exploitation of biogas beyond its conventional combustion. The results of the project will be a common reference point for all members of the supply chain of biogas production and municipal waste treatment.

The second research project was implemented at the wastewater treatment plant in N. Michaniona (Aeneia) from 28/6/2018 to 31/12/2021, by AKTOR S.A. (at the AENEIA Wastewater Treatment Plant) in collaboration with the Aristotle University of Thessaloniki (Department of Chemistry). entitled: “Removal of non-biodegradable organic charge and micropollutants with the application of heterogeneous catalytic ozonation from the effluent of urban wastewater treatment plants” with the acronym “Cat-Ozon”.

The project’s scope was to investigate the development and pilot application of an effective and cost-effective method of removing micropollutants and soluble non-biodegradable residual organic load (DOC) under real conditions from the effluent of a municipal wastewater treatment plant.

Micropollutants are compounds that are detected in the environment in very small concentrations and come mainly from pharmaceutical products consumed by modern humans (analgesics, antibiotics, hormones, psychopharmaceuticals, etc.). These compounds end up, through the sewage network, in wastewater treatment plants which are not designed to completely degrade these micro-pollutants, resulting in a significant proportion of them continuously accumulating in the environment. Such compounds, although occurring in aquatic

receptors in very low concentrations, can cause adverse effects (e.g., toxicity and endocrine disruptions) in organisms. It is therefore imperative to develop new efficient and environmentally-friendly technologies which can destroy the persistent organic micro-pollutants found in water receivers.

The implementation of the specific project led to the construction, for the first time, of an innovative prototype pre-industrial unit, using the heterogeneous catalytic ozonation process, by diffusing ozone into waste water through suitable membranes, without the creation of bubbles (bubble-less ozonation) and the use of catalysts.

With the successful outcome of the proposed project and the efficient removal of micro-pollutants with low fixed and operating costs, the foundations have been laid for the acquisition of know-how that can then be applied to many similar facilities.

It is worth mentioning that this research project led to the decision to submit an application for a patent, by filing a file with the Industrial Property Organisation. The invention will be entitled “Method of removal of micropollutants by the application of heterogeneous catalytic ozonation from water” and the process is ongoing.

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 motorways 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 is worth noting that AKTOR FM continues its cooperation with a company specialising in electric vehicle charging stations. Through this partnership, the Group has proceeded with the installation of 16 new electric vehicle chargers for private customers, thus reaching 24 in total.

DIGITAL TRANSFORMATION

ELLAKTOR Group has realised the need to enhance its digital operation and has set it as an immediate priority in order to further boost the effectiveness of its activities.

An important dimension of the strategy is the Group’s digital transformation, aiming to provide easy-to-use digital services oriented to the needs of the company. To achieve this, the Group’s IT Division implements flexible models for designing and implementing new digital solutions, incorporating innovative methods and cutting-edge technologies in many sectors.

The Group’s strategy in relation to the dissemination and implementation of Digital Transformation within its activities is “Cloud First”. Based on this strategy, IT considers as a priority the use of Cloud technologies to implement new requirements in the organisation, avoiding the purchase of equipment and the establishment of expensive Data Centres. Especially for business segments such as the construction, where the activity is not constantly intensive but depends directly on the number of projects at any given time, Cloud technology facilitates the escalation and de-escalation of resources when required, without binding capital which may lie idle for long periods of time.

A key prerequisite for digital transformation is the connectivity of the various locations where the Group has a presence, as the expected financial and operational benefits will only be achieved through the wide installation of networks and the provision of high-capacity services throughout its activity.

The Group has entered into a strategic partnership with Microsoft on Cloud issues, leveraging Microsoft's services to implement the Group's plans and the transition to the Cloud. Today it has implemented a number of projects that utilise Microsoft's Cloud technologies, such as email, user files, thematic sites (SharePoint), secure network access, Group Portal, ProjectView application for site management, etc.

Another action is integrating highly innovative and emerging technologies into the processing and management of the data collected by the Group in order to reuse and maximise utilisation, taking into account personal data protection requirements. This includes the implementation of actions to develop reporting using intelligent and parametric BI (Business Intelligence) applications in order to extract useful information for decision-making at business level.

The main objectives of Digital Transformation are:



- The provision of new and upgraded digital services and applications.



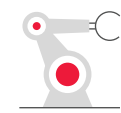
- The development of digital platforms to support business activity.



- Ensuring connectivity between all points of the Group's activity.



- Meeting digital skills needs, by providing appropriate training to users.



- Utilising and integrating cutting-edge technologies to automate and simplify complex processes.

The Group's digital transformation is an ongoing effort which strongly encompasses the concept of change, not so much in technology as in the way of working. Already, technology is widely used in different segments and activities of the Group. Examples include:

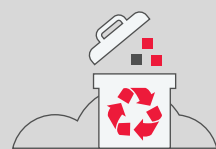
- Electronic Archiving, Handling and Documents Search
 - With the use of a special application, the documents are shared safely with people who need to have access electronically and also structured using special keywords (metadata), so that they can be easily searched. This minimises the use of paper.
- Electronic Signatures
 - The Group makes use of special certificates to issue digital signatures to speed up the signing process and reduce the size of the physical file.
- Development of Approval Flows in documents, where necessary
 - In many processes, the circulation of forms or contracts is supported by approval flows which are implemented systemically, so that the decisions made are transparent, documented, and fast.
- Platform for Online Employee Training
 - IT Department, in collaboration with the Group's Human Resources Division, have developed a special platform for user training, offering appropriate training in the required job roles.
- Integrated system for recording important information on construction sites in order to manage and control construction costs more effectively
 - A complementary system of the Group's central ERP (SAP) and records detailed data from project execution and progress to ensure a reliable data source which can be used to control project costs and progress.

- Implementation of a modern network which interconnects points of activity using state-of-the-art technologies such as Software Defined Networks
 - The application of this new technology allows the available network connections at the construction sites (ADSL, VDSL, Leasing Line, microwave, satellite, etc.), but also a combination of these, to be used to connect quickly, reliably and securely to the Group's headquarters.
- Full transition to Virtual Machine technologies to increase infrastructure's availability, reliability, and security
 - The use of virtual machine technology allows better and, at the same time, more cost-effective management of the technology resources required for a service. It also offers scalability, high availability and direct channeling of new machines.
- Support for remote working by IT users, with high operational functionality and security

- The COVID-19 pandemic has accelerated the need for remote staff working. As a result of the COVID-19 pandemic, the technology which now allows any IT user to move their work environment anywhere was developed, mainly by utilising cloud technologies.
- Automated invoice registration in digital form and automated data entry with Artificial Intelligence (AI) technologies, through the use of RPA (Robotic Process Automation) technology
 - This innovative technology speeds up data entry in structured systems (such as document entry in SAP) and at the same time reduces human errors.
- CPBX (Cloud Private Branch Exchange)
 - A call centre was developed in the Cloud where it replaces all the small call centres located at various points, especially at construction sites. This Cloud-based centre provides telephony at these points more cost-effectively and faster than previously since there is no longer any need for special equipment. Furthermore, the extension numbers given to employees follow them even if they change construction site, simplifying management.



ENVIRONMENT



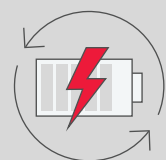
The waste treatment facilities of the Group's companies managed 925,246 tonnes of waste



A.S.A. is the only company in Greece with 2 glass processing plants



Upgrading and operation of the Mechanical Recycling Plant at Ano Liosia and converting it into a "Green Factory"



Investments in the new technological field of storage, with the implementation of battery installation projects



6 awards and honorable distinction as "Energy Supplier of the Year" for AKTOR Facility Management



CONTRIBUTION TO THE INCREASE OF AVAILABILITY AND RELIABILITY OF RENEWABLE ENERGY SOURCES

ELLAKTOR Group seeks to contribute to the collective European goal of a successful and sustainable transition to a climate neutral economy by the year 2050, in which Greece participates with the National Energy and Climate Plan (NECP) 2021-30.

For this reason, the Group continues to set as one of its main priorities for the coming years, continuous development and activity in the field of Renewable Energy Sources (RES). Recognising the significant business opportunities that arise and wishing to actively contribute to green development, the Group seeks the smooth continual operation of the existing RES projects in its portfolio, as well as the development and implementation of new projects.

Furthermore, aiming to further contribute to the increase of availability and reliability of RES, which are key prerequisites for the reduction of greenhouse gas emissions and the prevention of climate change, the Group invests in the new technological field of storage, with the implementation of battery installation projects. At the same time, the Renewable Energy Sources Segment is considering expanding its activities in the offshore wind sector, which is set to become a field of great development interest in the next decade.

Through the design and development of biogas utilisation plants, ELLAKTOR Group contributes to the prevention of climate change, by the substitution of fossil fuels, but also the effective utilization of methane which is released from Landfills and is the second largest contributor to climate change.

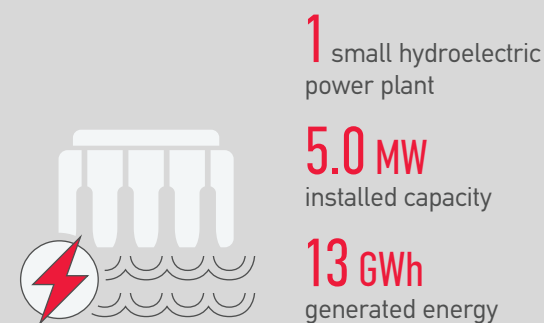
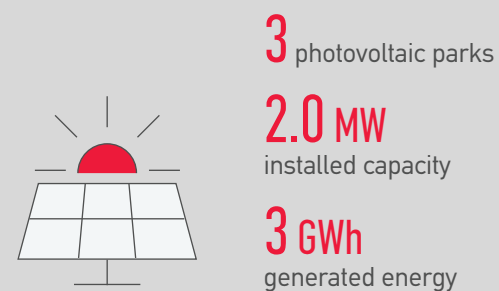
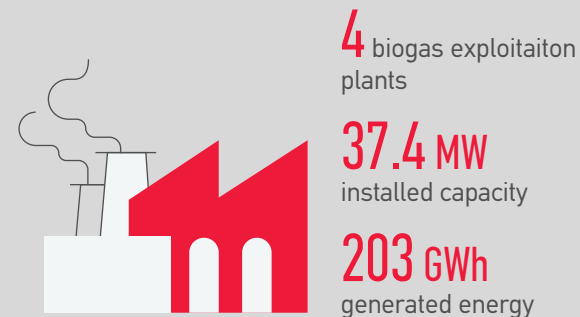
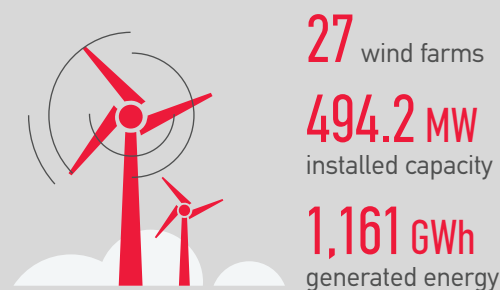
The Group's companies that invest in RES projects are included in the following segments: RES (24 wind farms, 1 photovoltaic and 1 small hydroelectric plant), Environment (3 wind farms and 4 biogas plants) and Concessions (2 photovoltaic plants). In total, the Group companies operate 27 wind farms with 494 MW total capacity. In 2021, the company proceeded with the development and environmental licensing of new large-scale RES projects, including three wind farms in Laconia with a capacity of 158.40 MW and two photovoltaic plants in Macedonia and Epirus with a capacity of 112 MW. Moreover, during 2021, the Environmental Impact Studies were conducted for the Strategic Investment that the company is implementing with EDPR in Evia, with a total capacity of 480.60 MW. In April 2022, the Approval Decision of Environmental Terms was issued for the part of the project that falls under the Municipal Unit of Styreon, with a total capacity of 160 MW.

The continuation of the environmental licensing of wind and photovoltaic projects is planned for 2022, as well as licences with a total capacity of 417.48 MW related to the production of electricity using Storage Accumulators. At the same time, the company plans to expand its pipeline of projects, which are in various stages of authorisation.

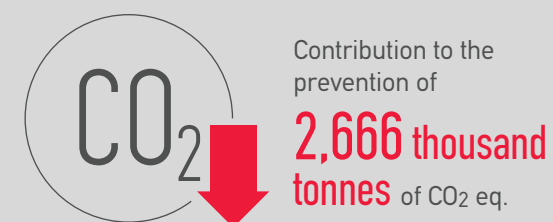
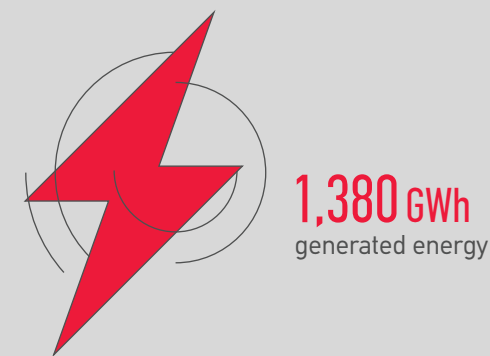
Through the generation of 1,379.51 GWh of electricity from RES in 2021, it is estimated that the Group contributed to the prevention of 2,665,887 thousandtonnes of CO₂ eq.¹ (third party) being released in the atmosphere. It is noted that the Group consumed 250 GWh for its operation (see section **Environmental Footprint Management**).

¹ For the calculation, the CO₂ coefficient included in the Energy Investments Guide of the Ministry of Development (2005) has been used, as well as the amount of methane that is burned in the biogas units and is not released into the atmosphere.

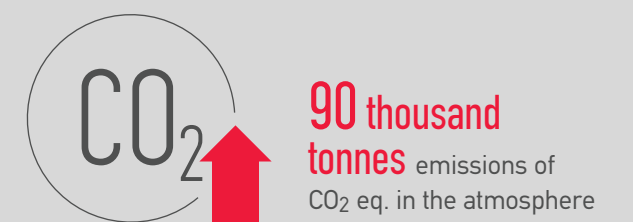
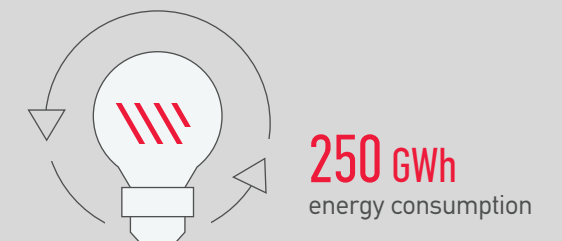
Key figures of the Group in 2021




Energy generation from RES



Operation of ELLAKTOR Group



Group companies' RES projects in operation in 2021

Municipality	Location	Installed capacity (MW)	Type of Project	Green Bond Revenues allocated to the project (€ mil.)
Alexandroupoli	Magoula Kazakou Diplon	23.00	Wind farm	 42.3
Alexandroupoli	Magoula Kazakou Diplon – Expansion	16.10	Wind farm	 20.3
Argos-Mykines	Mount Ktenias / High Lithari –Kontodiasela	23.00	Wind farm	 30.1
Argos-Mykines	Lekana	2.00	P/V	 10.8
Argos-Mykinese Tripoli	Lyrkeio	41.40	Wind farm	 50.2
Arriana-Alexandroupoli	Orfeas-Eptadendros	28.80	Wind farm	 24.1
Voios	East Askio Maestro	36.60	Wind farm	 37.9
Voios	West Askio	40.20	Wind farm	 40.9
Grevena	River Smixiotikos	4.95	Small-scale hydroelectricity	
Thermi	Landfill of Tagarades	5.05	Biogas	
Thiva	Pefkias	10.35	Wind farm	 10.1
Karystos	Kalinousiza Karpastoni	1.20	Wind farm	
Kefalonia	Monolati-Kseroliba	13.60	Wind farm	
Kefalonia	Monolati-Kseroliba – Expansion	6.40	Wind farm	 8.2
Kefalonia	Mount Agia Dynati	32.20	Wind farm	 40.98
Kefalonia	Mount Agia Dynati – Expansion	2.35	Wind farm	 3.4
Kos	Krotiri	3.60	Wind farm	 3.8
Lesvos	Scamniouda-Ypsoma Pachys	4.80	Wind farm	
Lesvos	Scamniouda-Ypsoma Pachys	4.20	Wind farm	
Monemvasia	Mali Madi Metamorfoseos	7.65	Wind farm	 12.6
Monemvasia	Kalogerovouni-Poulos	17.10	Wind farm	 21.3
Monemvasia	Gkropes-Rachi Gkioni	18.90	Wind farm	 23.7
Patmos	Kokinios Kavos	1.20	Wind farm	 1.5
Rhodes	Chalatas	3.00	Wind farm	 4.0

Group companies' RES projects in operation in 2021

Municipality	Location	Installed capacity (MW)	Type of Project	Green Bond Revenues allocated to the project (€ mil.)
Trizinia	Asprovouni	20.70	Wind farm	 29.4
Trizinia	Ortholithi	20.70	Wind farm	 29.5
Trizinia	Psili Rachi-Lambousa –Spasmeni Plaka	16.10	Wind farm	 22.5
Trizinia	Vromosyikia	11.05	Wind farm	 15.6
Fyli	Landfill Fyli	24.20	Biogas	
Zitsa and Pogonio	Kasidiaris 1 Kranies-Karavamia-Elatos	50.40	Wind farm	 53.1
Pogonio	Kasidiaris 2 Agriachladia-Profitis Ilias-Petra Haidos –Diavolorrachi-Profitis Ilias	39.60	Wind farm	 42.6
Lagada	Landfill of Mavrorachi	3.52	Biogas	
Suburbs of the Municipality of Amman (Jordan)	Al Ghabawi	4.65	Biogas	
		538.57		578.88

RES project financed by the Green Bond: 

Green Bond



The Group, by applying practices of responsible operation, is committed on the effective management of its environmental impacts, while at the same time it invests in enhancing its activities in the RES and Environment segments. Within this framework, it explores financing opportunities that take into account responsible investing criteria (ESG – evaluation for Environment, Social and Corporate Governance issues). At the end of 2019 and the beginning of 2020, the Group issued 2 international green bonds, amounting to a total of €670 million. The two bonds received the “Green Bond” certification from the Climate Bonds Initiative (CBI) organisation. Based on the certification criteria

(Eligible Green Project Criteria), the bonds are linked to RES projects that are already in operation (see RES projects table above).

It is noted 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 (€578 million in total) or are under construction (remaining €92 million) and therefore there are no unallocated revenues.

Regarding the portfolio of RES projects of the Green Bond (see table above), through the generation of 1,101 GWh of electricity in 2021, it is calculated that the Group contributed to preventing the emission of 934 thousand tonnes of CO₂ eq. into the atmosphere.

CONTRIBUTION TO CIRCULAR ECONOMY

ELLAKTOR Group has placed, among other sustainable practices, the circular economy at the core of its strategy, as the transition to the circular model is a prerequisite for entering a path of sustainable development and prosperity.

By adopting the circular economy model, the Group aims at as much conservation of products and materials as possible, by extending their life cycle and increasing recycling and reuse rates, thus increasing their added value. At the same time, it contributes decisively to achieving climate neutrality by 2050, a target which has been adopted by the country. The transition to the circular economy makes it imperative to promote and implement modern and innovative waste management methods, aiming to fully maximise the use of waste.

The Group's activity and, in particular, the Environment's segment, is inseparable linked to the circular economy, through HELECTOR, as it is operating in the waste management sector. HELECTOR is one of the largest companies specialising in Waste Management in Southeast Europe, and 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.

The company's plants apply Best Available Techniques (BAT) at all stages of waste treatment and management aiming to enhance recycling, produce useful secondary products, minimise carbon dioxide emissions, minimise landfill residue, divert the biodegradable fraction from landfill, and, ultimately, have a positive environmental footprint.

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

- The Integrated Solid Waste Management System (ISWM) in Western Macedonia with a capacity of 120,000 tonnes per year, which is the first Waste Management PPP project.

- The Heppenheim Biomass Treatment Plant, which has been in operation since 2016, and which is one of HERHOF's most emblematic projects is the first one worldwide to combine HERHOF's Anaerobic Digestion technology with Composting technology without the requirement for further maturation. The capacity of the plant is 31,000 tonnes/year of households' bio-waste.

- 16 anaerobic digestion plants in Germany, with a capacity of over 240,000 tonnes per year.

- The operation and maintenance of the Mechanical Recycling and Composting Waste (MRCW) plant in Liosia, with a capacity of 350,000 tonnes per year. The MRCW at Ano Liosia is currently the only municipal solid waste treatment plant operating in Attica and manages about 1/6 of the total waste generated in the entire Region.

- The Mechanical Biological Treatment Plant in Larnaca, Cyprus, is one of the first projects worldwide to use optical separation technology for the recovery of recyclables from mixed waste, with a capacity of 190,000 tonnes/year.

- 13 Waste Treatment Plants (WTPs) with a total capacity exceeding 2.2 million tonnes per year.

- The Hazardous Medical Waste Incineration Plant is the only licensed facility for hazardous medical waste management currently in operation in Greece, using the method of heat treatment (incineration), with a capacity of up to 12,000 tonnes per year, thus covering the total needs of the country's medical units (approximately 1,800 medical units). The plant contributes to assurance of 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.

- The Sterilisation Unit for Purely Infectious Hazardous Waste and Storage of Mixed Hazardous Waste and Other Hazardous Waste of Healthcare Units has a capacity of 18 tonnes per day and is supplied by a privately-owned collection-transport fleet of hazardous waste and cooperating companies that serve Healthcare Units.³ Recycling Materials Sorting Plant (RMS) with a total capacity of more than 175,000 tonnes per year.

- The largest landfills in Greece and Cyprus, with a capacity of more than 100 million cubic metres, with the most characteristic example being the Integrated Solid Waste Management Facility (ISWM) of Fyli, with a capacity of 1,897,000 tonnes of municipal solid waste per year.

Through the practices applied in projects, high reuse and recycling rates are achieved, maintaining the value of natural resources, raw materials and products. Indicatively in 2021, the following were achieved:

- Exploitation of 36,584 m³ of treated wastewater from leachate treatment plant of the ISWM in Western Macedonia for covering operational needs such as cooling the biological treatment plant, cleaning the waste treatment plant and irrigation.

- Exploitation of produced biogas from landfills and generation of electricity (202.5 GWh), which is fed to the grid. HELECTOR has 4 biogas utilisation plants in Ano Losia, Tagarades, Mavrorachi, and Jordan with a total installed capacity of 37.418 MW.

- Collection and recycling of "blue bin" waste (recyclable packaging materials) and redirecting of produced materials to raw material producers. The subsidiary company Solid Waste Recycling (ASA RECYCLE) that treats "blue bin" waste, recycled 63% of the total waste processed.

- Production of high-quality compost fertiliser ("CLO" - Compost Like Output) from organic waste at the waste treatment plants. At the Mechanical Recycling and Composting Waste (MRCW) plant in Liosia 35,033 tonnes of compost were produced, which were distributed in packages or in bulk, either commercially or free of charge, following requests from 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 23,956 tonnes of SRF (solid recovered fuel) at the MRCW plant in Liosia, and 42,737 tonnes 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 redirecting recyclable materials to producers/recyclers of raw materials. In 2021, the Integrated Solid Waste Management (ISWM) plant of West Macedonia processed 106,897 tonnes of waste, of which 12.38% were recovered. In the facility, a total of 27% of the incoming mixed waste from the Region of Western Macedonia was 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 2021, rock debris from the construction of Landfills was recovered and, after special treatment, was used for the construction of new landfills and/or for covering waste.

It is worth mentioning that subsidiaries in the Environment segment, such as ASA Recycle, enter into collaborative relationships with subsidiaries of the Construction segment of the Group to receive and manage waste such as mixed packaging resulting from the latter, and extend its life span, in the context of strengthening industrial symbiosis.

The Group cooperates with licensed entities for the collection or recovery, treatment, reuse and/or disposal of waste, reducing the quantities of waste that end up in landfills, thus contributing to the protection of ecosystems and the areas around these sites.

The activity of the two waste management units for the treatment of excavation, construction and demolition waste (ECDW) in the Regional Unit of Ioannina, continued in 2021.

The company HELLENIC QUARRIES aims, through the operation of these two new units, to decrease and gradually eliminate uncontrolled waste disposal to vulnerable recipients, to increase the lifetime of waste disposal sites, and to exploit the unit's products and residuals for the rehabilitation of inactive quarries. The total amount of excavation and demolition waste received by the two units during the year was 2,258 tonnes.

HELLENIC QUARRIES runs a monitoring program for factors related to the aggregate production process at the company's construction sites. In particular, dust, crystalline silica, noise and vibration measurements are carried out annually in cooperation with the Hellenic Institute for Occupational Health and Safety. In the quarry at the Mavra Vouna site, dust emissions are continuously monitored with a measuring device which is permanently installed by the company at the plant.

GLASS RECYCLING



A.S.A. operates the first privately-owned glass processing plant in Aspropyrgos, Attica, which receives materials from the regions of Central, Southern and Island part of Greece. Since 2017 it has been operating the second privately owned glass processing plant in Thessaloniki, which serves the whole of northern Greece area.

The glass processing plant receives empty glass packaging for separation, which are crushed using a crusher and then separated by mechanical means (using screens, magnets and optical separators) into transparent and coloured glass fragments.

The glass packaging waste resulting from the sorting

operations of the incoming waste is taken to the shredder for crushing, so that the material is of the desired size that will facilitate the further separation process. The crushed material is then passed through an array of sieves, magnets, optical separators to separate coloured and uncoloured material and any remaining ceramic elements (stones, porcelain, or even residual metallic impurities).

The output material is led to temporary storage within the existing building within the land area of 10,882.70 sq.m. in Aspropyrgos, Attica in bulk, or in suitable temporary storage means, until it is transported to further processing-recycling facilities (glassworks).

Despite the COVID-19 pandemic during 2021 there was an increase of 12% in glass recovery.

GREEN FACTORY



In August 2021, the new project for the Upgrade and Operation of the Mechanical Recycling Facility of Ano Liosia and its transformation into a "Green Factory", began. The new contract concerns the annual management of 300,000 tonnes of municipal waste, of which 100,000 tonnes will be pre-sorted organic waste.

Specifically, the Plant, after the completion of the modifications for its upgrade to a Green Factory, which is expected to be completed within 2023, will be able to process the following streams:

- **Municipal Mixed/Residual Mixed Municipal Solid Waste (MSW)**

The MSW that will be received and treated by the Plant will be the mixed-residual, mixed municipal waste stored in the network of bins or in other temporary storage means, as provided by the municipal waste collection vehicles. The quantities to be processed will be up to 200,000 tonnes/year and will be treated on two (2) of three (3) identical processing lines in the Mechanical Sorting Department.

- **Pre-sorted Bio-waste**

It includes the reception and treatment - composting of pre-sorted Bio-waste which will be collected from the municipal separate collection networks (brown bin) and from the street markets. The quantities to be treated will be 60,000 tonnes/year.

- **Green Waste-Pruning Waste**, which are required for composting the biodegradable fraction of mixed-residual waste and pre-sorted Bio-waste. The quantities to be processed will be 40,000 tonnes/year.

In addition to the above, the Plant will accept additional green waste - pruning from 20,000 to 35,000 tonnes/year which will be provided by the municipalities and managed at the Plant.

The most important modifications for the "Green Factory" include:

1. Addition of sequential optical separations in the treatment of the mixed waste stream. The aim of these separations is to recover PET, PE and PP plastic packaging from this fraction, resulting in a significant increase in the recovery rate of recyclable plastics.

2. New Reception/Pre-treatment building and a new Pre-sorted Bio-waste Composting Facility, which includes closed-type bioreactors (composting cells). In this way, the production of ecolabel quality compost, derived from pre-sorted organics, will be significantly increased. This will be made available free of charge by EDSNA (the waste management authority for Attica) to the citizens for use as a soil improver.

3. Installation of a new system consisting of presses - loading stations for dry fraction residues (new compression stations). This will greatly improve the proper environmental management of the residues during their transport from the point of production to their disposal in the landfill (minimisation of dispersion).

4. Installation of a new chain conveyor and the existing press. The parceling of recovered cardboard and bulky PP plastic packaging will now be optimised.

5. SCADA software upgrade at the Mechanical Recycling/Composting/Refinery Facility. This upgrade will provide greater reliability in the operation of the individual treatment units and the ability to incorporate future software modifications more quickly. In addition, with this modification, a single control/monitoring software is now used in all processes, with a wide range of applications internationally in industrial plants, ensuring greater flexibility in technical support for the sector.

6. Lastly, targeted interventions and additions to the project's anti-pollution systems and extensive maintenance are being carried out to ensure optimal operation of the facility.

Management of Third-Party Waste in 2021

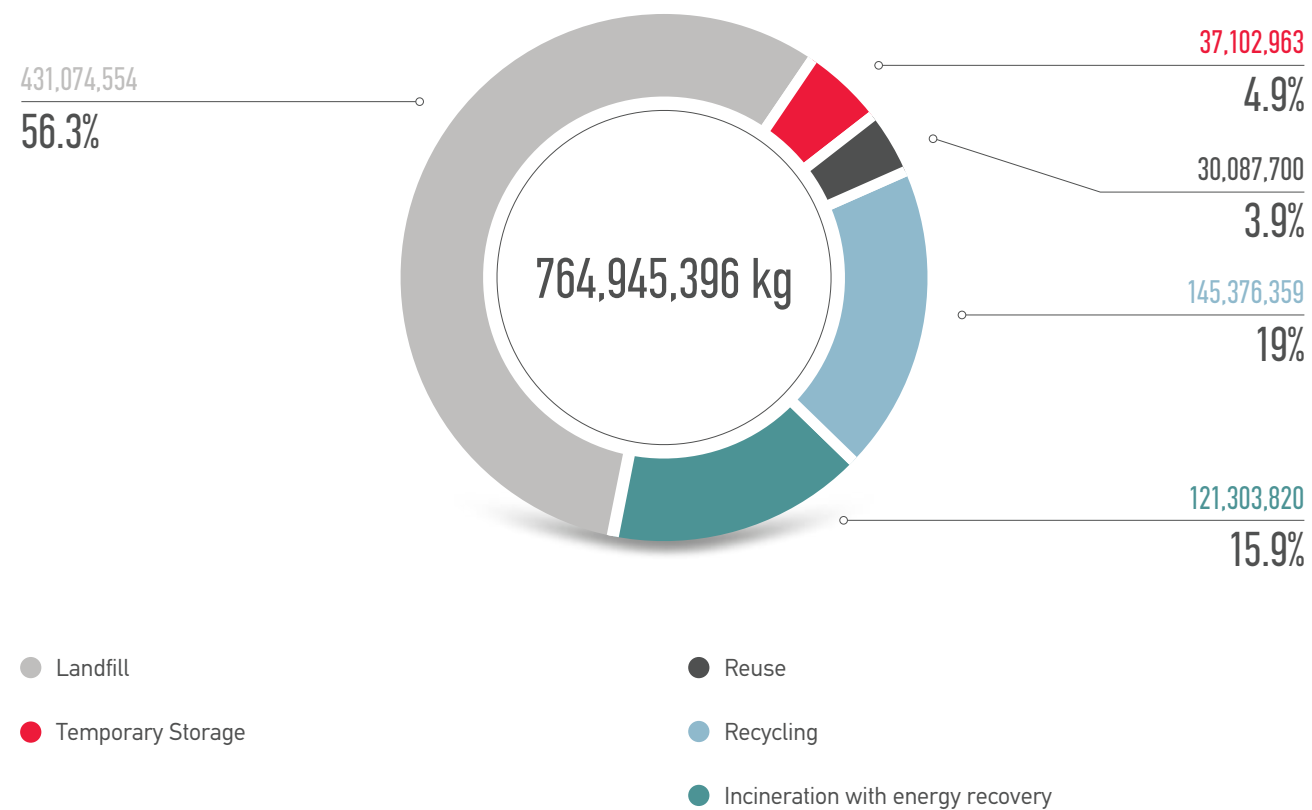
In 2021, the waste treatment plants of the companies in the Environment segment managed 925,246 tonnes of waste compared to 885,614 tonnes in 2020, of which 915,753.7 tonnes were non-hazardous waste (municipal waste) and 9,492.6 tonnes were hazardous waste (hospital/infectious waste). The method of managing the waste output from these plants is presented below.

With respect to the transport of hazardous waste (e.g., hospital waste), the companies in the Environment segment are duly licensed for this work and have undertaken the appropriate measures, ensuring the protection of public health and the environment. In 2021, 9,492.6 tonnes of hospital waste were transported.

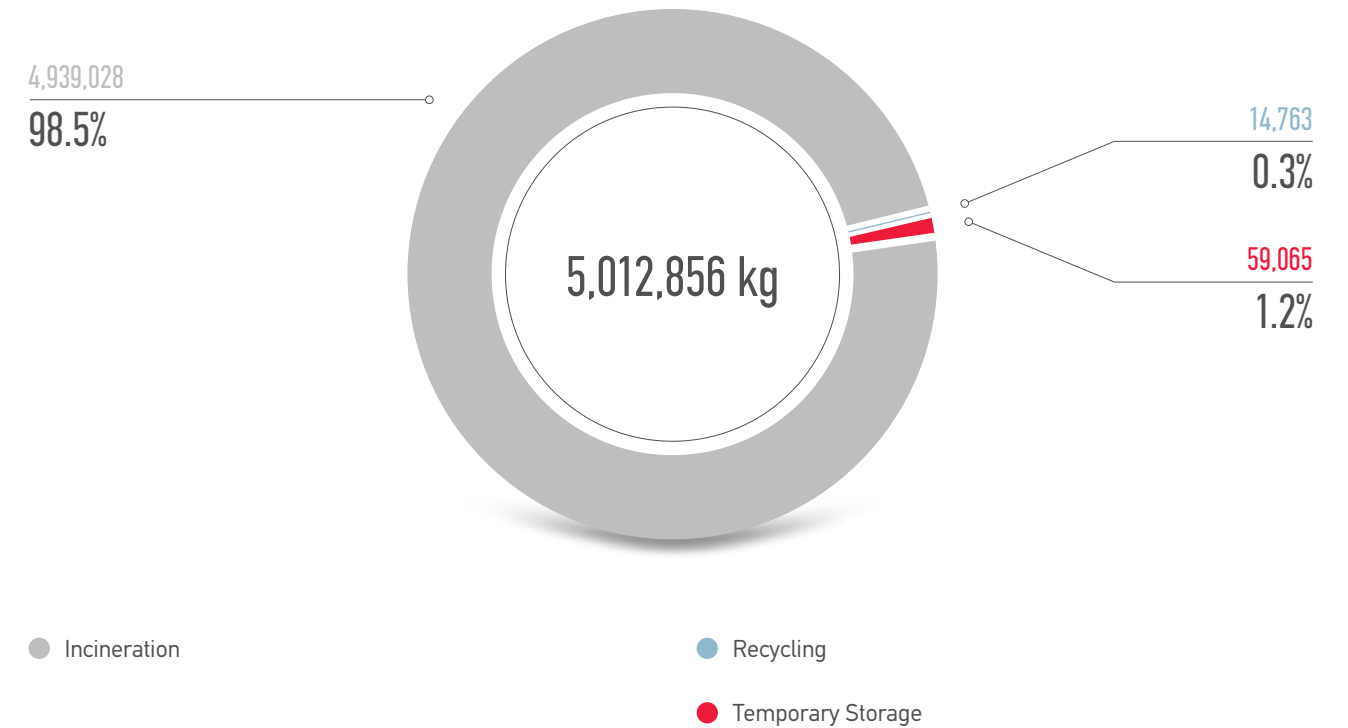
In the field of Hazardous Medical Waste Management (HMWM), the Group, through the HELECTOR S.A. – ARSI S.A. Joint Venture, manages the only Medical Waste Incineration Plant (MWIP) in Greece. The plant has been in operation since 2002 at the landfill site in Ano Liosia. In 2021, the plant received 4,871 tonnes of hazardous waste from medical units (hospitals, clinics, microbiological labs, private medical units, dental clinics, veterinary clinics and pharmaceutical warehouses), applying advanced technology and Best Available Techniques (BAT).

In addition, at the 2nd Industrial Area of Volos, 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. Specifically, in 2021, the plant treated 4,620 tonnes of hazardous waste through advanced methods and inactivation techniques.

Management methods of Non-Hazardous Waste (kg)



Management methods of Hazardous Waste (kg)



Note: The difference in the quantity of waste input and output (hazardous and non-hazardous) is due to the treatment method, the loss of moisture of the waste, and the quantities of stored waste output from the previous year.

The quantities of waste managed by recycling method include the quantities managed by composting.

Waste Management of Wastewater Treatment Plants Waste in 2021

In parallel, the Group is active in the construction, operation and maintenance of Wastewater Treatment Plants. Amongst other, it is responsible for the operation and maintenance of the Psyttalia Wastewater Treatment Plant, which is one the largest environmental projects in Greece, as it makes a vital contribution to the environmental protection of the area, while enhancing biodiversity in the Saronic Gulf ecosystem.

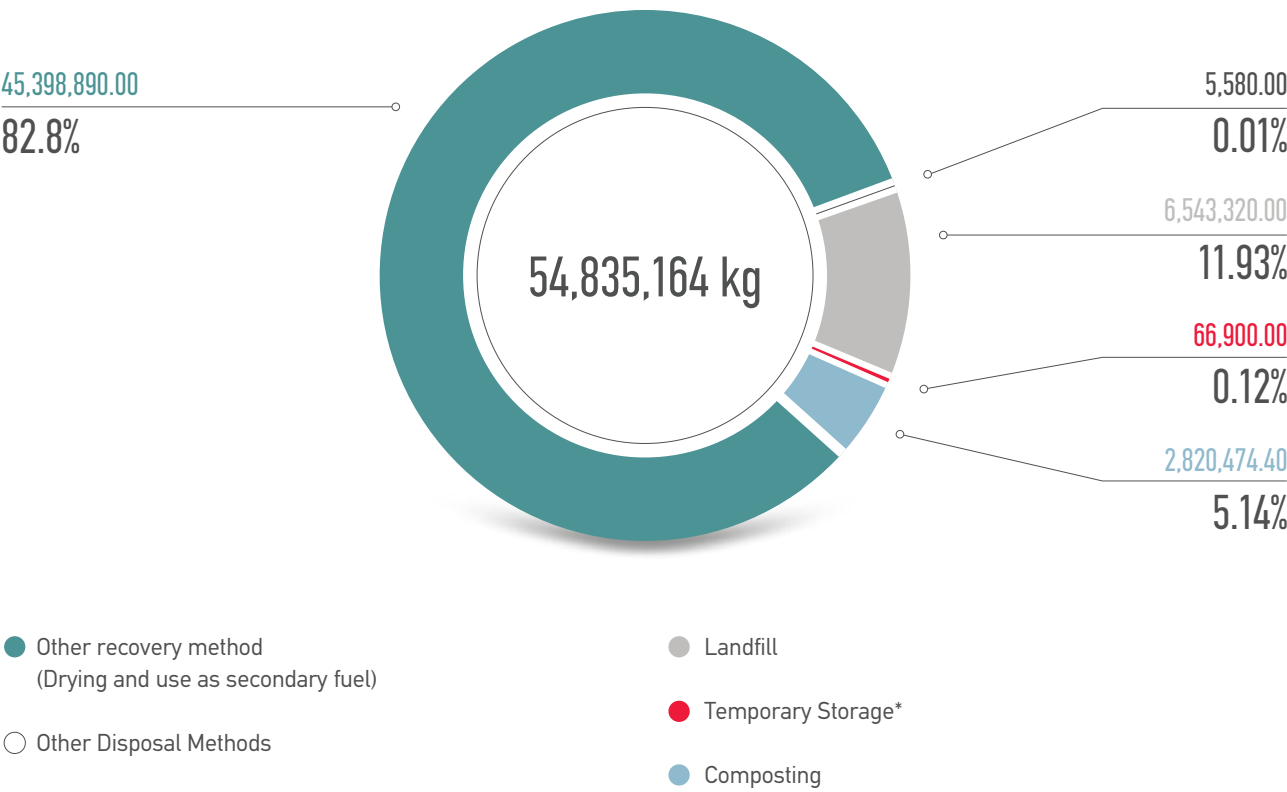
In 2021, the Wastewater Treatment Plants in which the Group's companies participate managed 302,795,868 m³ of wastewater and received 5,889 tonnes of sludge for treatment. The methods used to manage solid waste produced from the operation and maintenance of wastewater treatment plants or received for treatment at these plants, are presented in the chart below.

Waste Management of Wastewater Treatment Plants

Waste Management	Management methods (kg)					Total Quantity
	Composting	Other recovery method	Landfill	Other disposal method	Temporary Storage*	
Dehydrated sludge	1,612,282.50	5,888,770.00	-	-	-	7,501,052.50
Dried sludge	1,416.90	39,510,120.00	-	-	-	39,511,536.90
DR	-	-	852,970.00	-	-	852,970.00
Screenings	886,435.00	-	4,059,100.00	5,580.00	-	4,951,115.00
Sand	320,340.00	-	1,631,250.00	-	66,900.00	2,018,490.00
Total	2,820,474.4	45,398,890	6,543,320	5,580.00	66,900.00	54,835,164.4

* On-site.

Management Methods for Non-Hazardous Waste (kg)



* Off site, pending to be subjected to recovery method.

ENVIRONMENTAL FOOTPRINT MANAGEMENT

The Group, recognising its responsibility towards the environment, has set effective environmental management and the reduction of any burden resulting from its business activities as a goal and priority. In this context, it applies practices to minimise negative environmental impacts and protect ecosystems, while it focuses on informing its stakeholders and raising their awareness on environmental issues.

Environmental Management

The Group's ESG Strategy & Sustainable Development Division is responsible, among others, for the systematic monitoring of environmental management from the Group's companies, the development of appropriate action plans and environmental programs that will lead to improvement of the environmental performance of the Group's segment activities, as well as for strengthening the environmental awareness of the Group's employees and its subcontractors.

With the exception of the RES segment, the main companies of the Group's segments apply certified environmental management systems (ISO 14001:2015 and/or EMAS), through which they accomplish reduction of their impact form their activities on the environment and they adopt practices related to recycling, energy saving, efficient water management, wastewater management and protection of biodiversity. At the same time, the Group's companies' compliance with the applicable environmental legislation is ensured.

The Group's main companies have an Environmental & Energy Management Department, which refers functionally to the Group's ESG Strategy & Sustainable Development Division and is responsible for ensuring proper compliance and continuous improvement of the environmental and energy management systems of each company. An Environmental and Energy Management Officer is appointed in each project, depending on its nature and size, for the implementation of the environmental terms, the environmental legislation and the Environmental Management Plan, who is guided by the Environmental & Energy Management Department of each subsidiary.

The main impacts from the operation 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. Specifically, solid waste is mainly generated from the Construction segment. In all projects and activities, from the construction to the rehabilitation phase, the Group focuses on the protection of the environment and minimising the impacts of its activities on it. Based on the activities of each company and each individual project, environmental impacts are identified and evaluated, and specific action plans or alternative environmental management programs are developed.

The Group recognises the main risks and threats concerning environmental management. Indicatively the following are mentioned:

- non-compliance with environmental legislation,
- non-compliance with the environmental permit of the project,
- pollution incidents at sea or in a water recipient,
- fire risks,
- uncontrolled dust emissions,
- uncontrolled air emissions,
- waste spills,
- soil pollution,
- inefficient use of energy resources,
- increased water consumption,
- noise and vibrations above limits,
- complaints from stakeholders/written complaints/ fines,
- environmental impacts from subcontractor's activity, and

- risks related to ensuring business continuity and preparedness to respond to emergency situations (e.g., pandemic).

In order to reduce the environmental impacts of its activities and mitigate its environmental risks, the Group focuses on the following:

- Compliance with the applicable environmental legislation, internal procedures and instructions, any other requirements and conducting of regular audits.
- Use of environment-friendly technologies.
- Energy management, ensuring rational energy use and efficiency through specific initiatives and monitoring of consumption.
- Monitoring air pollutants and implementing anti-pollution technologies.
- Rational management of hazardous and non-hazardous waste, with an emphasis on reuse and recycling, implementing procedures for the sorting of waste by stream.
- Decreasing water consumption and increasing its reuse, where possible.
- Implementing emergency response plans and using special equipment to prevent potential environmental impacts from emergency situations.
- Monitoring noise, vibration and other nuisances in order to reduce the overall impact on the community, traffic, utilities and protected areas.
- Protecting ancient artifacts and monuments of cultural heritage.
- Restoring green spaces and project landscapes based on the approved environmental terms.
- Rational management of raw materials and natural resources.
- Monitoring avifauna, where required, and implementing measures to protect biodiversity.

- Informing, training and raising awareness of employees on environmental-energy issues in the workplace and the impact that the companies' operations have on the environment and society in general.

- Reducing the environmental impact of its subcontractors' activities by carrying out sampled internal audits and by setting waste management terms in contracts.

The organisation of companies on environmental and energy management issues continued in 2021, given emphasis on education, raising awareness and strengthening environmental consciousness and on the contribution of digital transformation to the method that environment and energy data are collected.

In the context of raising awareness, the basic Environmental and Energy Rules, which include rules for the protection of the environment and the local community, were established and communicated to the Group's employees. At the same time, a new tool for the transmission of monthly Environment and Energy messages with different themes each time was launched on a pilot basis, aiming to raise employee awareness on energy, water and waste management issues.

In cooperation with the Information Technology Division, the electronic platform (ESG Monitoring Platform - ESGMP) was completed, in which project/activity managers have access and register annual performance data.

The platform enables the automatic extraction of results and key performance indicators at company and Group level, thus significantly improving the process of collecting, analysing and comparing performance data. The platform was in place for the collection of the 2021 data.

Regarding the internal audit of projects for compliance with environmental legislation, environmental terms and internal procedures, an internal audit program was implemented, with 42 audits being made by the team of certified internal auditors. The deviations identified during these audits were recorded for immediate follow-up to ensure that they are closed.

The costs spent on environmental protection such as, among others, infrastructure for waste management, environmental studies and measurements of environmental parameters was €2,776,190 in 2021.

AKTOR

Continuous efforts to improve environmental management

In 2021, after continuous efforts to improve its environmental management, AKTOR achieved the following:

- Internal audits of the projects continued to identify potential deviations from the Environmental Terms (ET), with continuous monitoring of corrective actions, aiming to improve environmental performance.
- The Group's basic Environmental and Energy Rules were communicated to raise awareness and train employees.
- The Environment and Energy training induction was redesigned, and the Environmental Officers of the projects were trained in order to train and raise

awareness of all employees, including subcontractor's employees.

- Monthly Environment and Energy messages were issued with a different theme each month, for the development and awareness of employees.
- 3,861 hours of Environment and Energy training were provided to 1,290 employees.
- A tool was created for the systematic electronic recording of training on Environment and Energy management issues.
- A new electronic registration tool for the environmental legislation was created per subject area and communicated to the projects for implementation.

AKTOR FACILITY MANAGEMENT

Distinctions at the ENERGY MASTERING AWARDS

AKTOR Facility Management received 6 awards and the honorary distinction of "Energy Supplier of the Year" at the "Energy Mastering Awards" ceremony held in February 2022, in the presence of the General Secretary for Energy and Mineral Resources of the Ministry of Environment and Energy, Alexandra Sdoukou.

The company's distinctions related to the way it operates, with regard to environmental protection and climate change impacts, its good practices for improving energy efficiency and its continuous contribution to the reduction of its environmental footprint.

In particular, AKTOR FM received the following awards:

- WINNER award in the category "Financial Institutions/ Banking" for the energy interventions in NBG

administration buildings.

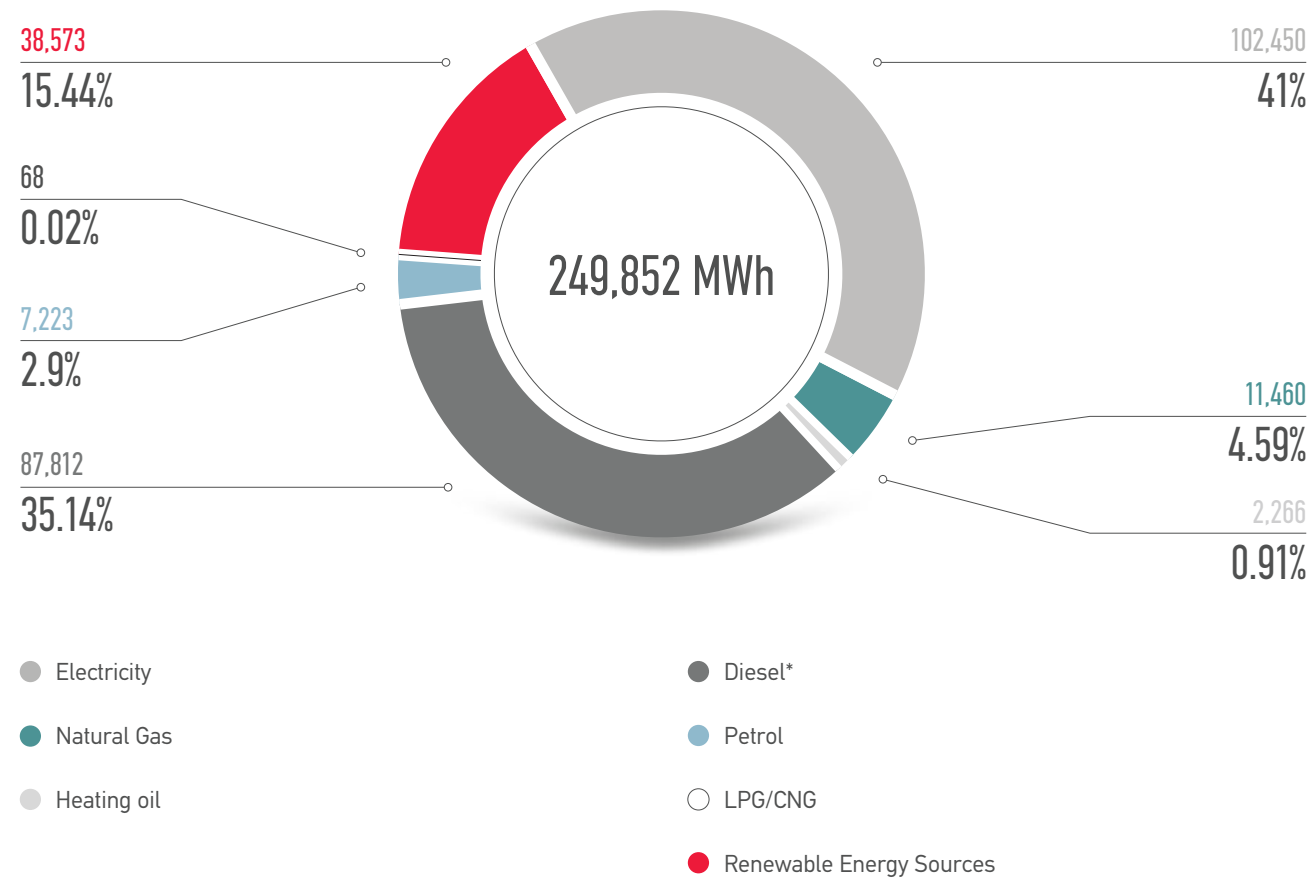
- Two GOLD awards in the categories "Energy Efficiency" and "Energy Services Companies/ESCOs" for the energy upgrades at the data center of the National Bank of Greece and for its dynamic participation in ESCO - Energy Efficiency Contracts.
- Two SILVER awards in the categories "ISO EN 50001 Certification" and "Energy Efficiency in Street Lighting" for achieving its targets in the implementation of ISO 50001 and its dynamic participation in large energy upgrade projects in Local Government Organisations/regions.
- BRONZE award in the category "Energy Intelligence Software" for the sustainable development of cities and organisations.

Energy consumption

Throughout 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 head offices and at the Group companies. In addition, AKTOR, AKTOR FM, ATTIKES DIADROMES, ATTIKI ODOS, HELEKTOR and MOREAS apply certified Energy Management Systems, in accordance with the ISO 50001:2018 standard.

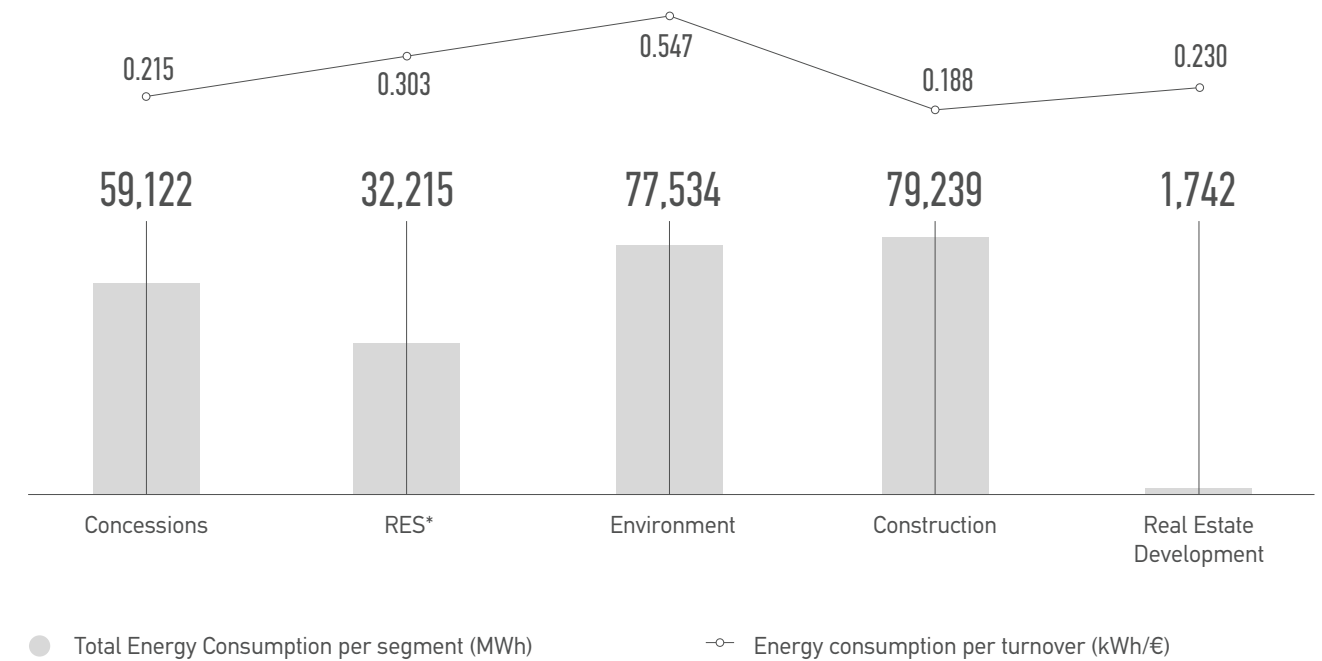
In 2021, the Group's total energy consumption amounted to 249,852 MWh (892 TJ). The largest share of energy consumed (44%) resulted from fuel consumption, with diesel as main fuel (35.15%), which is mostly used for the operation of the construction machinery (excavators, loaders, trucks etc.), but also from electricity (41%). The percentage of energy consumed that derived from renewable sources was 15%. At the Head Offices, electricity consumption amounted to 0.231 MWh/m², showing an increase of 2% compared to 2020.

Energy Consumption (MWh)



* The consumption of diesel relates to the use of Heavy Duty Vehicles, such as excavators, loaders, trucks (62%), the use of company vehicles (34%) and the use of plant machinery (4%).

Energy consumption per segment



* The data regarding the parent company ELLAKTOR S.A. have been included in the RES segment.

Regarding the RES segment, energy consumption relates to the use of heavy-duty vehicles, the use of stationary equipment, the electricity consumption of the RES projects from the system, of the company's headquarters and the consumption of fuel for the transportation of employees with company vehicles.

Regarding 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 analyses potential improvement opportunities with respect to its energy performance, implementing the appropriate actions*:

- Installation of Management and Automated Control Systems at its plants.
- Installation of a Power Management System.
- Installation of an advanced Distributed Control System (DCS-CMDA).
- Implementation of an Equipment Maintenance and Inspection program.
- Implementation of emergency systems for maintenance works and possible disruptions in the operating system.

* The specific actions mostly concern the companies, J/V HELEKTOR S.A. - ARSI S.A., STERILISATIONS S.A, EDADYM SINGLE MEMBER S.A., and BEAL S.A.

MOREAS:

Initiatives to reduce energy consumption

In October 2021, the action of replacing open street luminaires of older technology (High Pressure Sodium - HP Na) with new-technology, LED-type lights, on the perimeter road of the rest area (SEA) ALEA was implemented. This upgrade is expected to create energy savings of 90% (45 MWh/year). In addition, during the year, approximately 15 luminaires in various building facilities were replaced with LED-type ones. This action is estimated to reduce energy consumption by 48% (1.3 MWh/year).

During 2021, 24 more air conditioning units in the Toll Stations' booths were replaced with inverters ones of higher efficiency in heating and cooling. Savings are expected to amount to 70 MWh/year.

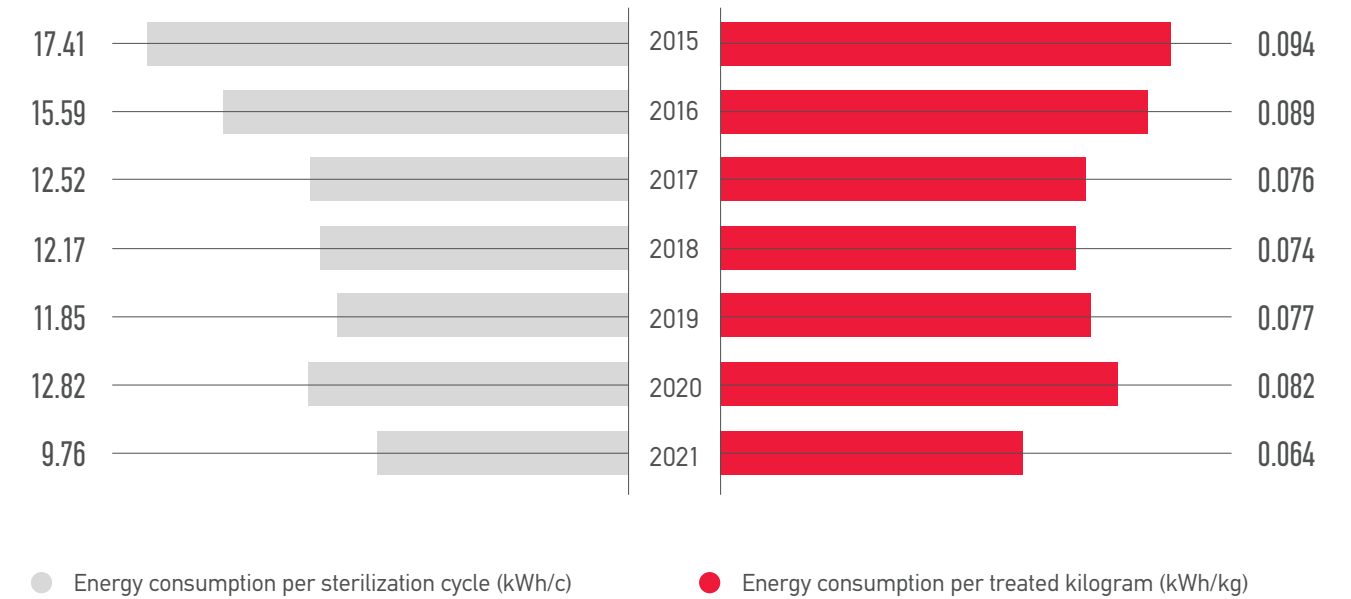
During the reporting year, 3 patrol vans were replaced with lower nominal energy consumption ones. The estimated annual savings are expected to be 18 MWh/year.

Environment Segment:

Monitoring energy indicators

The companies of the Environment segment, seeking continuous improvement, monitor specific performance indicators over time (e.g., energy consumption per kilogram of treatment, energy consumption per sterilisation cycle, etc.).

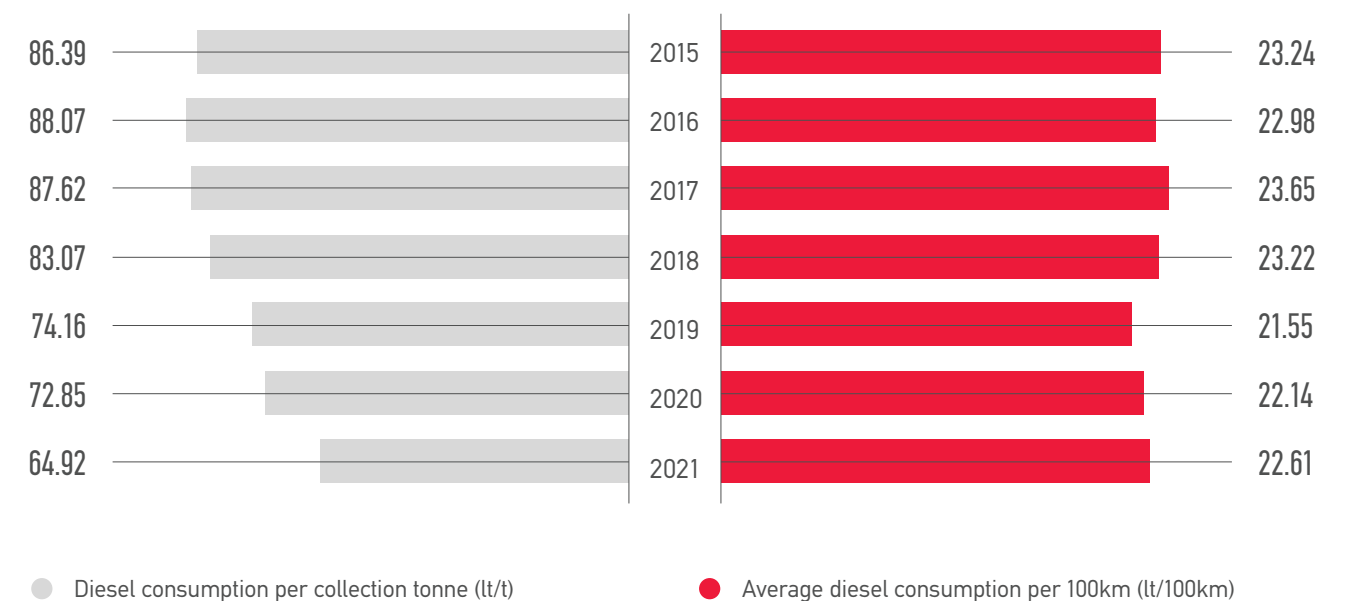
In 2021, due to the COVID-19 pandemic, there were extremely increased requirements for waste treatment plants for healthcare units. In particular, the Sterilisation and Incinerator facilities were required to treat larger quantities of waste to meet the needs of healthcare and hospital services. The Sterilisation Unit promptly installed a fourth ECODAS T2000 sterilisation machine, since the increase in the quantities of waste to be treated exceeded 30% and approximately 90 tonnes per month. The Unit has successfully managed its new energy demands and, taking advantage of the significant increase in the quantities and cycles of sterilisation performed, has shown a significant reduction in specific electricity consumption (per cycle and per kilogram of treated waste), as shown in the following chart, with a 22% reduction per kilogram for Sterilization S.A.

Progress of Energy Indicators for STERILISATION S.A. company

At the same time, integrated IT and Telematics Management Systems are used to increase the reliability of the collection and transport system of infectious waste. Through these systems improvement of human resources and vehicle fleet management, better monitoring and display of the route of infectious waste of healthcare units,

and minimise the environmental/energy footprint of this activity were achieved.

The aforementioned systems are used to record oil diesel per tonne of collection, as well as the average consumption per 100 km as shown in the chart below.

Transportation project consumption data by STERILISATION S.A.

As presented in the chart, there is an increase in the average of company's vehicles fuel consumption per tonne of waste collection, due to the significant increase in waste due to the pandemic COVID-19; the weight of the transported waste per load also increased significantly, so the vehicles were conducting transport route with a larger load, which affected their overall average consumption.

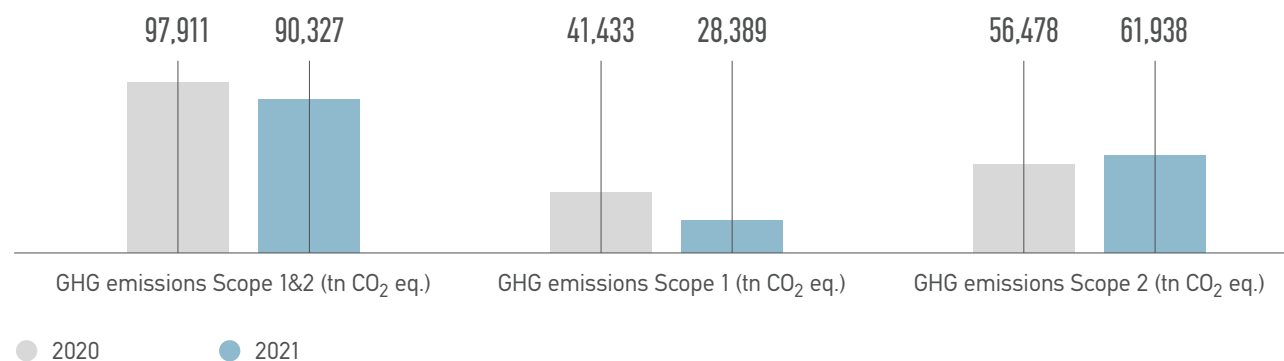
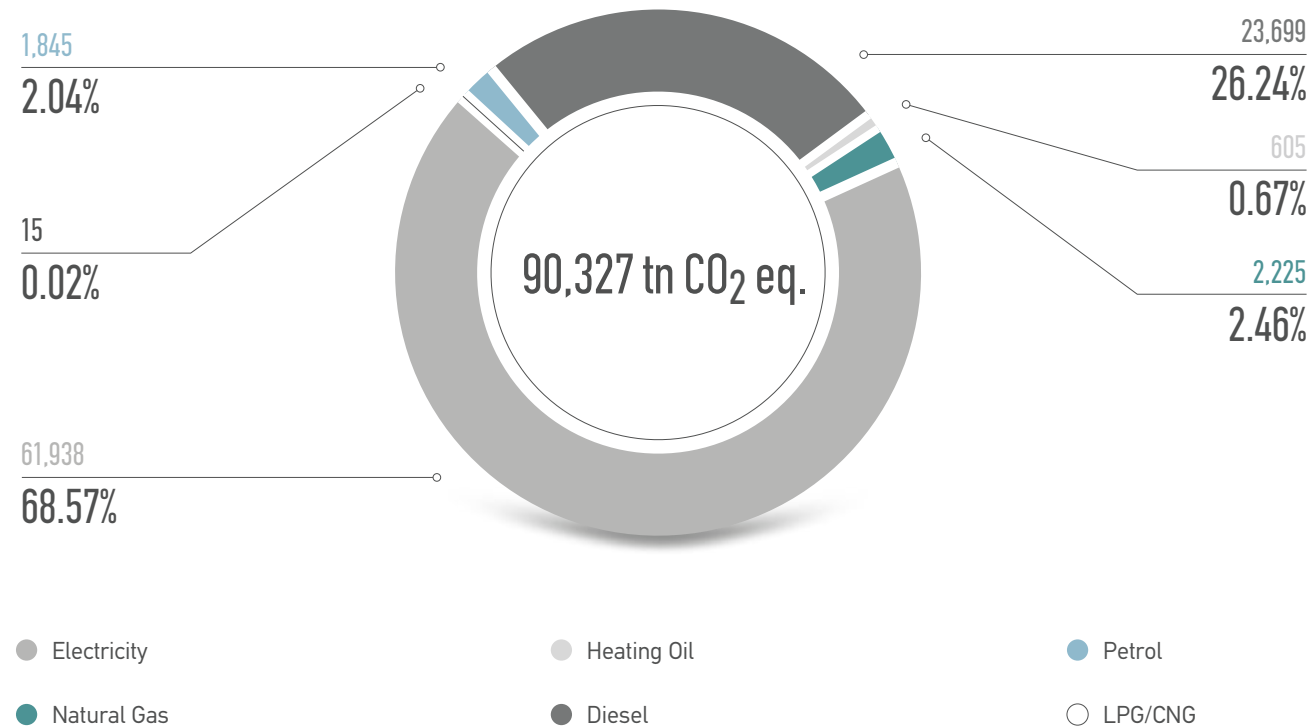
In parallel, due to the increase in the unit load transported, there was a significant reduction in consumption per tonne of load, which further confirms the effective energy management of the transport fleet of the company "STERILISATION S.A.".

Air emissions

The Group's greenhouse gas emissions (GHG) for 2021 are calculated at 90,327 tonnes of CO₂ eq. (scope 1&2) reduced by 7.8% compared to 2020, of which 69% (61,938 tonnes of CO₂ eq.) derived from electricity consumption (indirect emissions - scope 2) and the remaining 32% (28,389 tonnes of CO₂ eq.) from the consumption of natural gas, heating oil, diesel, petrol, LPG and CNG (direct emissions - scope 1).

Emissions from electricity consumption (scope 2) **increased by 10%**, while emissions from fuel consumption (scope 1) **decreased by 32% compared to 2020**.

GHG emissions Scope 1&2 (tn CO₂ eq.)



The emission factors from the National Inventory Report of Greece for Greenhouse and other gases 1990-2019 (March 2021) were used to calculate the CO₂ emissions from natural gas consumption, heating oil, diesel for plant machinery, diesel fuel, petrol for plant machinery, petrol and LPG. The emission factors from IPCC Guidelines for National Greenhouse Gas Inventories 2006 were used to calculate the emissions from CNG consumption. The indirect emissions of CO₂ from the consumption of electricity are calculated based on the data included in the annual national report for 2021, submitted to the United Nations Framework Convention on Climate Change (UNFCCC).

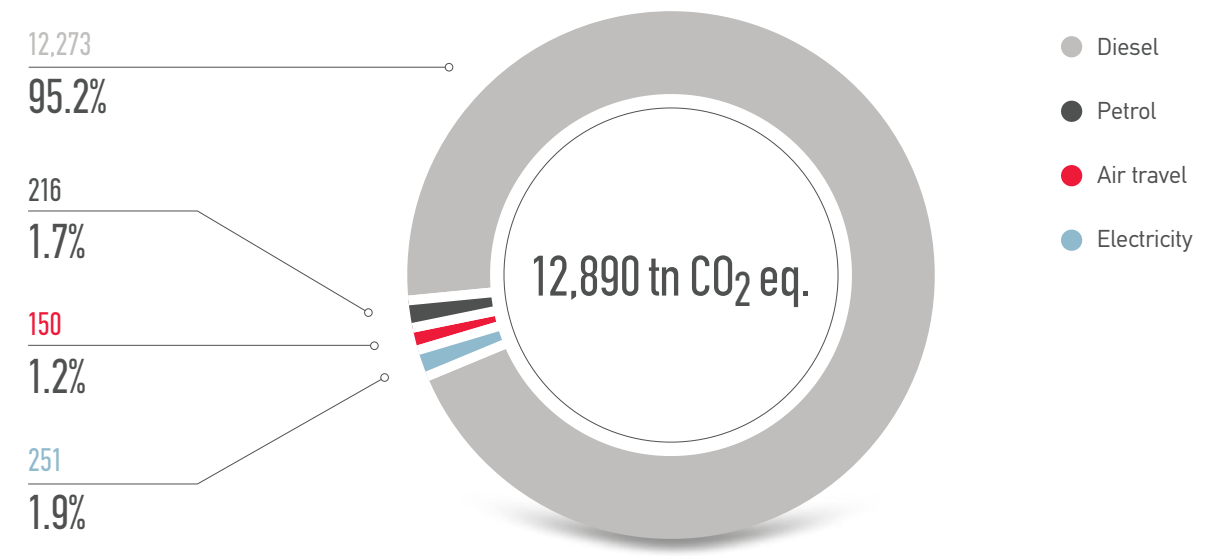
For the conversion of CH₄ and N₂O emissions to tonnes of CO₂ eq, the 100-year time horizon Global Warming Potential values that are included in the Decision 24/CP.19 of the Conference of the Parties of the UN Framework

Convention on Climate Change (UNFCCC) were used.

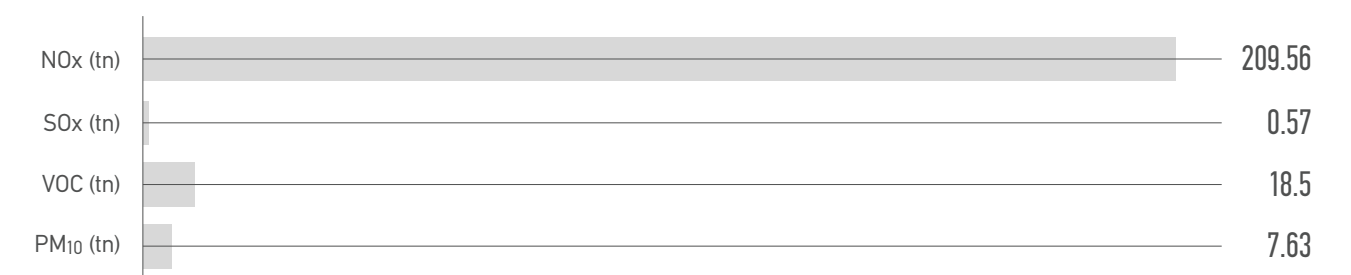
Lastly, the Group proceeded with the calculation of the remaining air pollutants (NO_x, SO_x, VOC, PM₁₀), which resulted from direct energy consumption (natural gas, diesel for mechanical equipment, diesel, petrol for mechanical equipment, petrol, LPG and CNG). The emission factors from the EMEP/EEA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

In 2021, the Group continued to record the energy consumption of subcontractors employed in its projects and activities, as well as the energy consumption arising from the business air travel of employees for the calculation of indirect emissions (scope 3) as shown in the chart below.

GHG emissions Scope 3 (tn CO₂ eq.)



Other air emissions



Air Pollutants and Air Quality

A key priority of the Group's Environment segment is to ensure the air quality of its premises and the surrounding areas. In this context, it implements best available techniques for combustion and carries out continuous inspections to minimise air emissions.

HELECTOR:

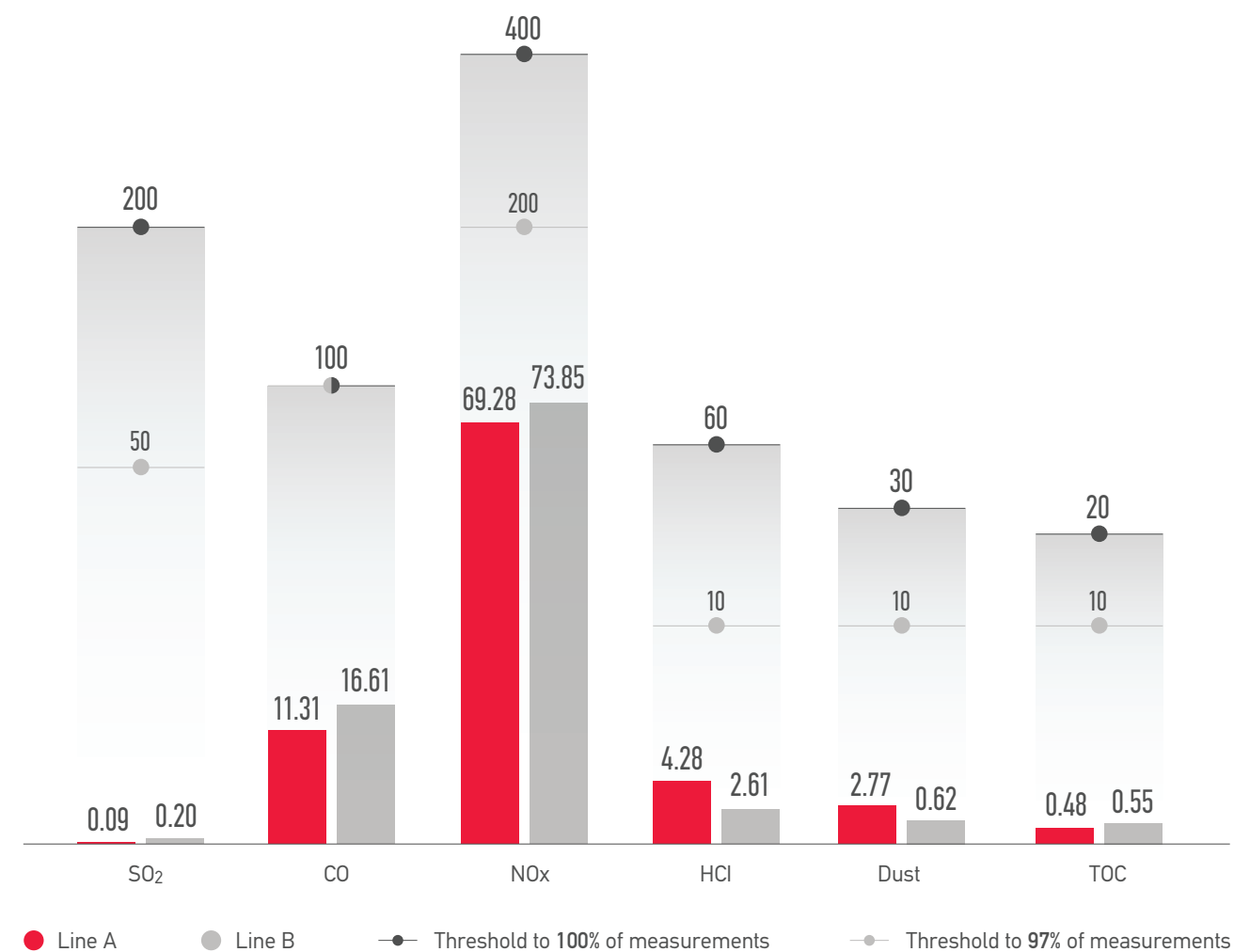
Monitoring of air emissions from hospital waste incineration facility in Ano Liosia

HELECTOR implements an air emissions monitoring plan to its hospital waste incineration facility in Ano Liosia, in accordance with the requirements of the relevant

legislation. The 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 gas air emissions carried out by certified external laboratories.

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

Annual average air emission measurements (mg/Nm³) per 30 minutes in two parallel incineration lines, A and B for 2021, compared to relevant limits set by legislation (control limits at 100% and 97% of the measurements)



Water Consumption and Wastewater Management

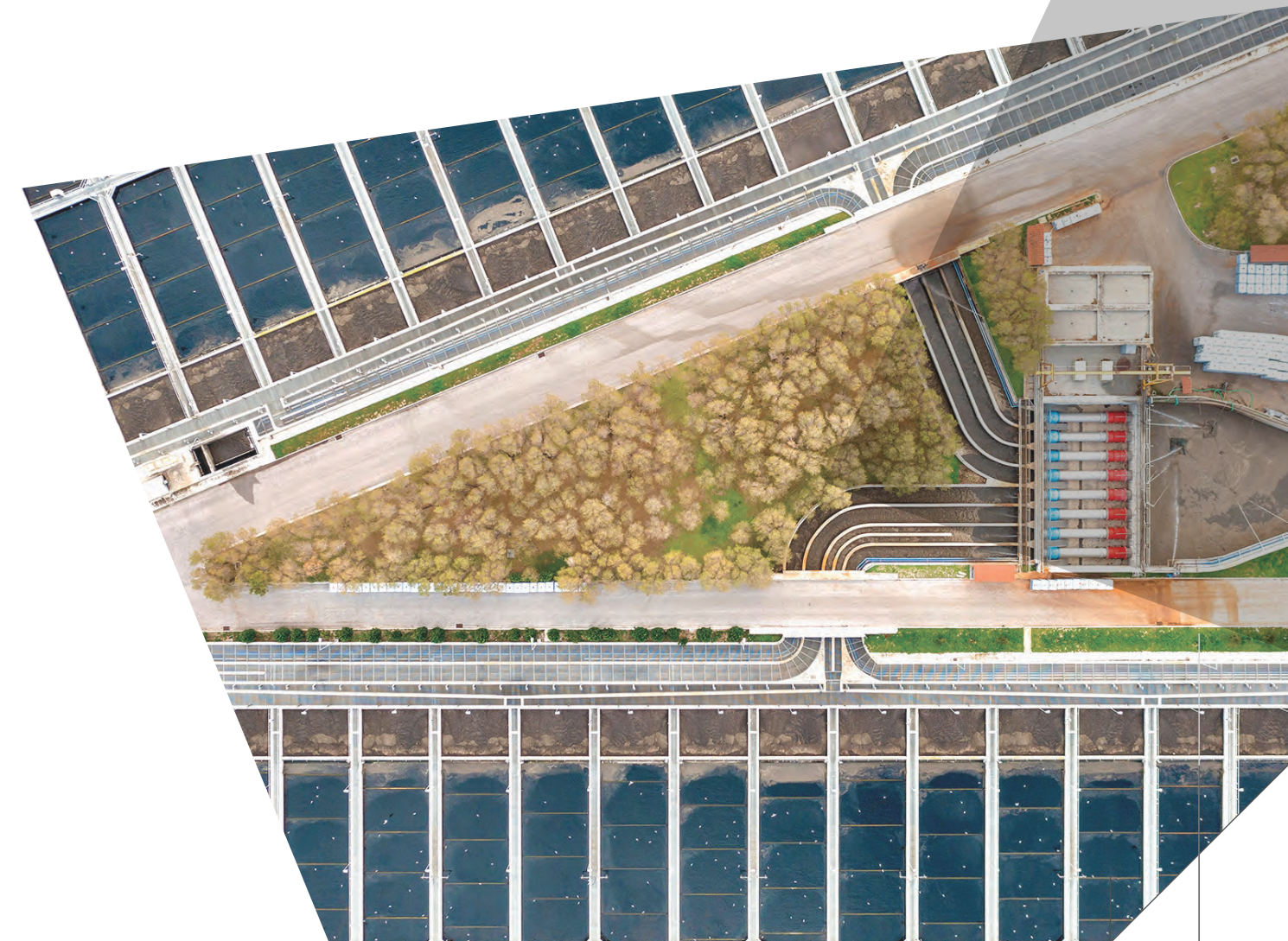
The Group's companies' withdrawal water mainly concerns cooling, sanitation, irrigation, washing (road surface and/or vehicles), sprinkling, waste treatment needs, etc. Total water withdrawal in 2021 at Group level amounted to 1,183 ML, reduced by 18% compared to 2020, of which 8% was recycled or reused water. At head offices, water consumption was 0.151 m³/m², reduced by 56% compared to 2020.

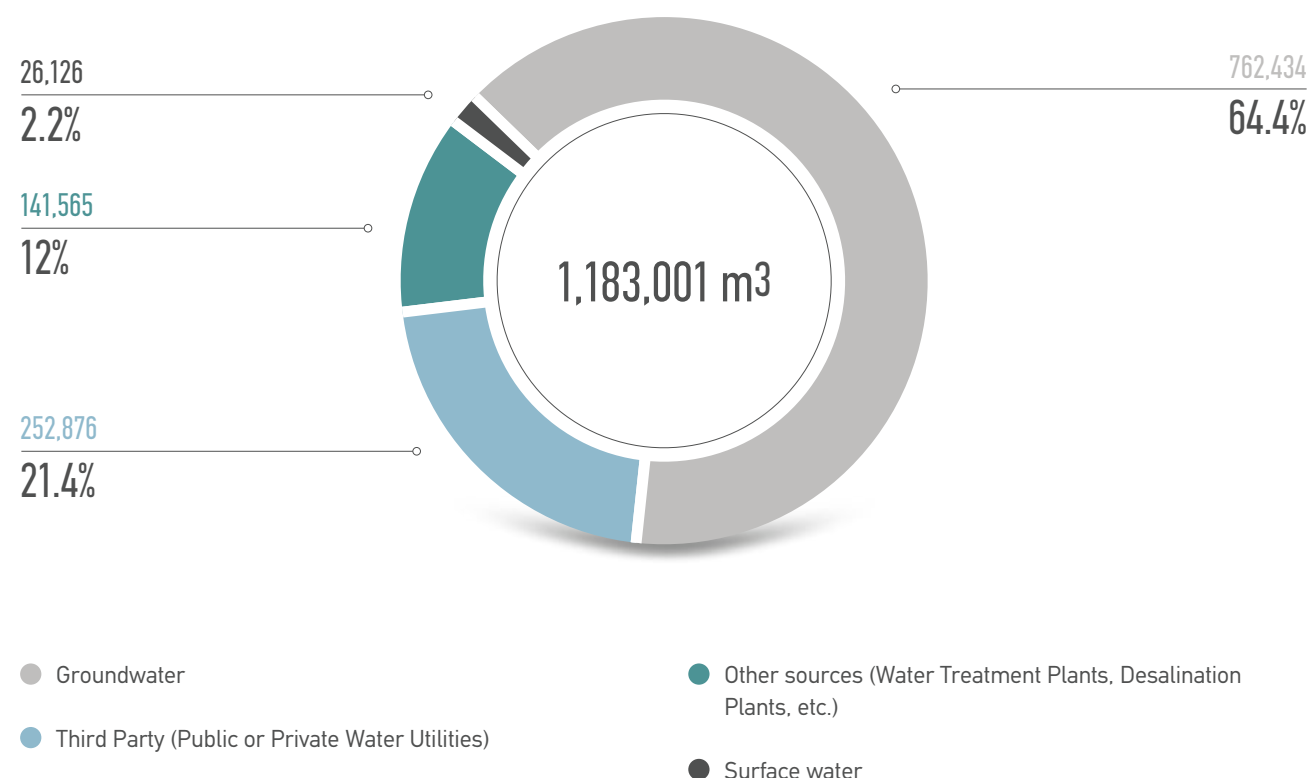
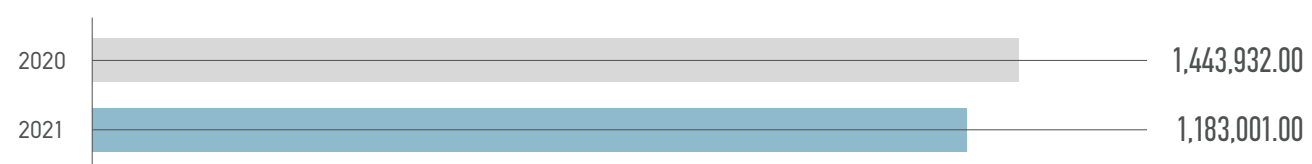
Water withdrawal at Group level derives from groundwater by 64%. In order to maximise water savings, the companies manage water and apply reuse practices, where possible, after appropriate treatment of wastewater. The irrigation is controlled by central electronic systems that are programmed depending on the climate conditions, in order to avoid wasting water resources. In addition, quality, chemical and microbiological analyses are carried out regularly to monitor water's quality. In 2021, there was an 8% reduction in total water withdrawal for the companies ATTIKES DIADROMES and ATTIKI ODOS compared to 2020. Similarly, a decrease showed by the companies of AKTOR (36%), HELECTOR, (29%) and REDS (18%) compared to 2020.

More specifically, in the Environment segment, HELECTOR implements consistent and long-term measures for the conservation and rational management of water at its Waste Treatment Plants. Specifically, through the Leachate and Wastewater Treatment Facilities, it treats the leachates generated from its operation and reuses them during the biological treatment of waste and/or for irrigation of areas of its facilities.

In the Construction segment, appropriate measures are being implemented to reduce water consumption, including:

- Reuse of treated water for cleaning machinery and for spraying construction sites and roads.
- Communication of environmental and energy messages with specific themes on water management and conservation.
- Installation of specific guidelines in employee areas (toilets, kitchens, etc.) that outline best practices and instructions for employees to avoid wasting water.



Sources and Quantities of Water Withdrawal (m³)Total Amount of Water Withdrawal (m³)

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, appropriate signs have been placed potable.

With regard to the management of effluents, in the Construction segment and with the aim of minimising water pollution at the construction sites, wastewater management is carried out in accordance with the

relevant legislation and the project's Environmental Terms Approval Decisions (ETAD), whereas chemical analysis of water effluents is conducted at regular intervals, where required. In the projects where there is a repair workshop for vehicles, effluents from the vehicle service ramp are collected and treated in accordance with the Standard Environmental Commitments (SEC) or the project's ETAD and are then reused for water-spraying purposes or led for final disposal. In addition, in the concrete batching plants, suitable slopes and ramps have been developed in order to direct effluents into sedimentation tanks, and then reuse wastewater in accordance with the project's environmental permit.

For the activities in the Environment segment, wastewater that is generated from the companies' different processes is separated into industrial wastewater and municipal wastewater. Due to the industrial and sewage's wastewater different pollution load, different treatment techniques are used prior to their disposal to the final, in accordance with the facilities' ETAD. At the same time, frequent quality analyses are carried out on the wastewater 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 the associated degree of hazard, but also to reuse, recycle and then dispose in accordance with legislation.

Waste management is carried out, based on the requirements of the national and European legislation, as those are specified in the Environmental Terms Approval Decisions (ETAD), as well as any other requirement based on internal procedures, customer requirements and the specificity of each project or activity.

The collection, transport and disposal of waste is carried out by licensed companies (subcontractors), which are registered in the Electronic Waste Registry (EWR) of the Ministry of Environment and Energy and are led to licensed final receivers. The Group keeps a record of all documents for all waste and identification forms for hazardous waste in accordance with the applicable legislation.

At the Head Offices, the Group implements recycling programs, which include waste from the operation of offices (paper, toner, plastic, etc.), electrical and electronic equipment waste (computers, monitors, etc.), home batteries, UPS and generator's batteries, as well as used mineral oils.

Respectively, the companies in the Concessions segment, recycle all types of waste generated from the operation of motorways (used mineral oils, accumulators, spare parts/iron scrap, green waste, etc.).

A calculating tool has been developed for the complete recording of waste from all projects, where the quantity and the management method per waste stream is registered by each project's Environmental Officer on an annual basis and sent to the Environmental Manager of each subsidiary in order to be evaluated and checked before being sent to the Group's ESG Strategy & Sustainable Development Division.

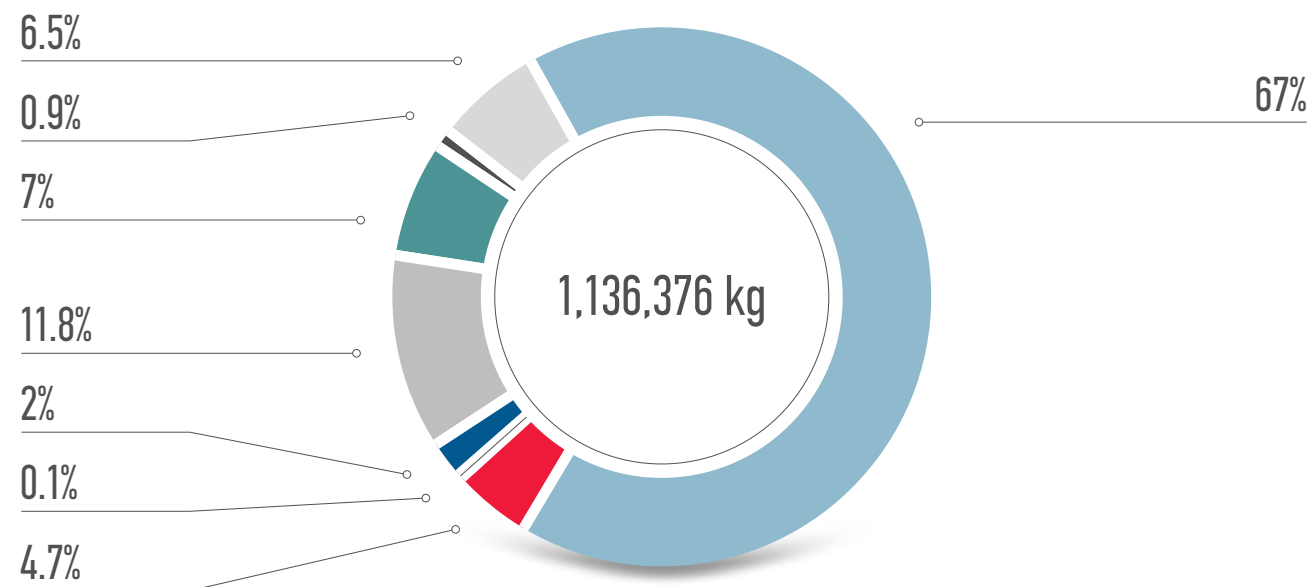
Out of the total amount of waste (hazardous and non-hazardous) generated from the operation of the Group's companies in the facilities/projects under their own management such as the Head Offices, the activities of the Concessions and RES segments, and the Mechanical Equipment Management, 67% were utilized with recovery methods, 32% was disposed of, and 1% remained temporarily stored.

More specifically, 889 tonnes of non-hazardous waste and 841 tonnes of hazardous waste were recovered and not disposed of to landfill. The analysis of these waste by stream is shown in the following charts and tables.



WASTE GENERATED BY THE GROUP'S OPERATION

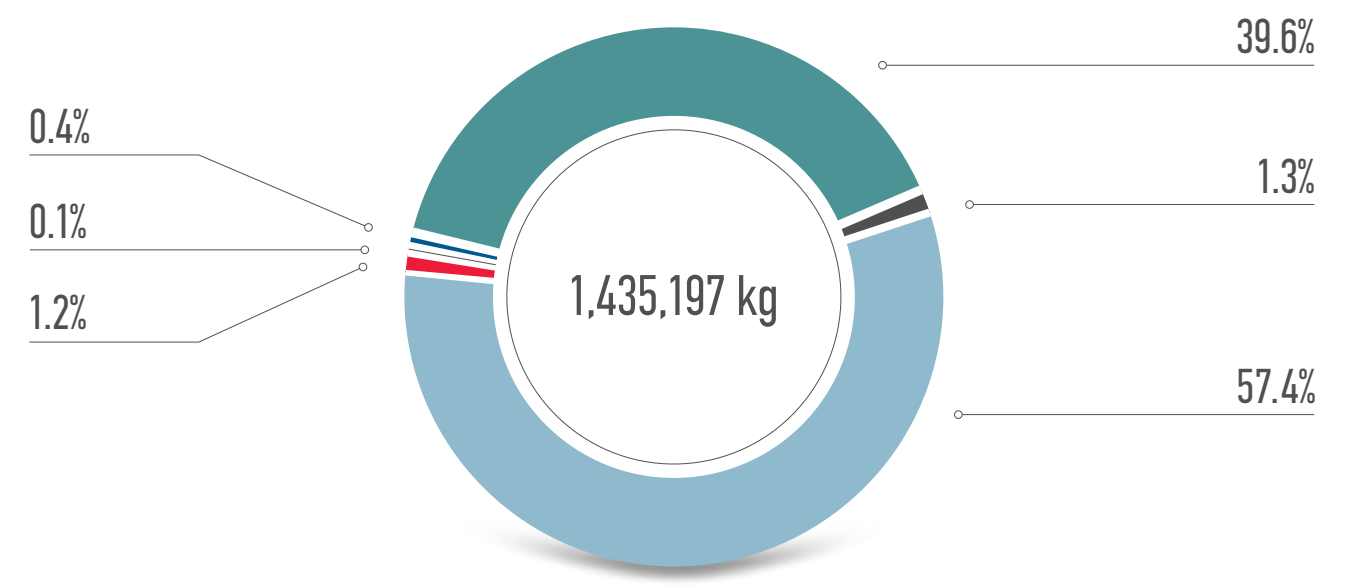
Non - hazardous Waste Management



- Recycling
- Landfill
- Other recovery method
- Other disposal method
- Incineration
- Temporary storage
- Incineration with energy recovery
- Reuse

Management Methods	Non - hazardous Waste (kg)
Reuse	73,708
Recycling	761,469
Other recovery method	53,685
Incineration	1,533
Incineration with energy recovery	22,162
Landfill	133,794
Other disposal method	80,000
Temporary on-site Storage	10,025
Total Quantity	1,136,376

Hazardous Waste Management



- Recycling
- Incineration with energy recovery
- Other recovery method
- Other disposal method
- Incineration
- Temporary Storage

Management Methods	Hazardous Waste (kg)
Recycling	823,827
Other recovery method	16,852
Incineration	1,272
Incineration with energy recovery	5,368
Other disposal method	569,220
Temporary on-site Storage	18,658
Total Quantity	1,435,197

The large reduction in the amount of non-hazardous waste is due to the completion of the construction of renewable energy projects, therefore no excavation waste was generated as in 2020.

In addition, it should be noted that municipal waste is not included in the above quantities in its entirety.

Table of Non-hazardous Waste generated by the Group

Non-hazardous Waste Category (kg)	Μέθοδοι Διαχείρισης			Total Quantity
	Recovery (R)*	Disposal (D)**	Temporary Storage	
Paper	72,518.06	-	-	72,518.06
Scrap metal (iron & aluminum)	506,045	-	-	506,045
Glass	40	-	-	40
Plastic packaging / Plastic	64,579.99	-	-	64,579.99
Municipal waste	-	158,153.64	-	158,153.64
Tires	4,228	-	-	4,228
Waste from electrical and electronic equipment	1,182.40	-	-	1,182.40
Demolition waste	-	-	9,200.00	9,200.00
Excavation waste	72,000.00	-	-	72,000.00
Cables	895.00	-	825.00	1,720.00
Mixed packaging	70,200.00	-	-	70,200.00
Wooden packaging / Pallets	1,040	30	-	1,070
Mixed non-hazardous waste	94,626	77,772	-	172,398.00
Other non-hazardous waste	1,508	1,532.60	-	3,040.60
Total	888,863	237,488	10,025	1,136,376

* Reuse (on-site): 72,120 kg, Reuse (off-site): 1,588 kg, Recycling (on-site): 12,460 kg, Recycling (off-site): 749,010 kg, other recovery method: 53,685 kg.

** Incineration: 1,533 kg, Incineration with energy recovery: 22,162 kg, Landfill: 133,793 kg, other disposal method: 80,000 kg.

Table of Hazardous Waste generated by the Group

Hazardous Waste Category (kg)	Management Methods			Total Quantity
	Recovery (R)***	Disposal (D)****	Temporary Storage	
Used mineral oils	132,419.37	-	4,914	137,333.37
Lead-acid accumulators	14,136.00	-	-	14,136.00
Waste from electrical and electronic equipment	15,047	-	2,440.00	17,487.00
Lighting bulbs	780.40	-	15.00	795.40
Batteries	612	-	1,495	2,107.00
Contaminated Packaging	7,575	150.00	3,615.00	11,340.00
Toner	97.88	-	30.00	127.88
Solvents	92.00	616.00	184.00	892.00
Contaminated Absorbent materials	4,836.00	2,689	3,295.00	10,820.00
Oil filters	1,781.00	3,185	2,070.00	7,036.00
Fats and oils	-	-	600.00	600.00
Laboratory waste	20.00	-	-	20.00
Purely infectious medical waste	2	-	-	2
Bottom ash	636,370.00	-	-	636,370.0
Fly ash	-	569,220.00	-	569,220.0
Other hazardous waste	26,910	-	-	26,910
Total	840,679	575,860	18,658	1,435,197

*** Recycling: 823,828 kg, other recovery method: 16,851 kg.

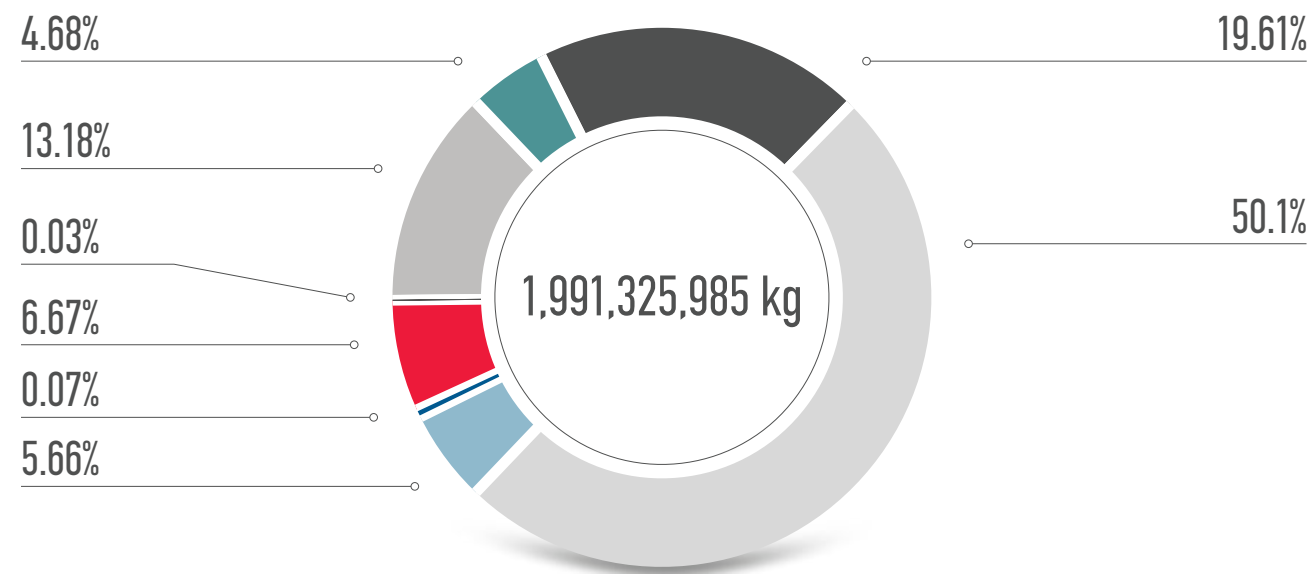
**** Incineration: 1,272 kg, Incineration with energy recovery: 5,368 kg, Other disposal method: 569,220 kg.

WASTE MANAGED BY GROUP'S COMPANIES AND SUBCONTRACTORS

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

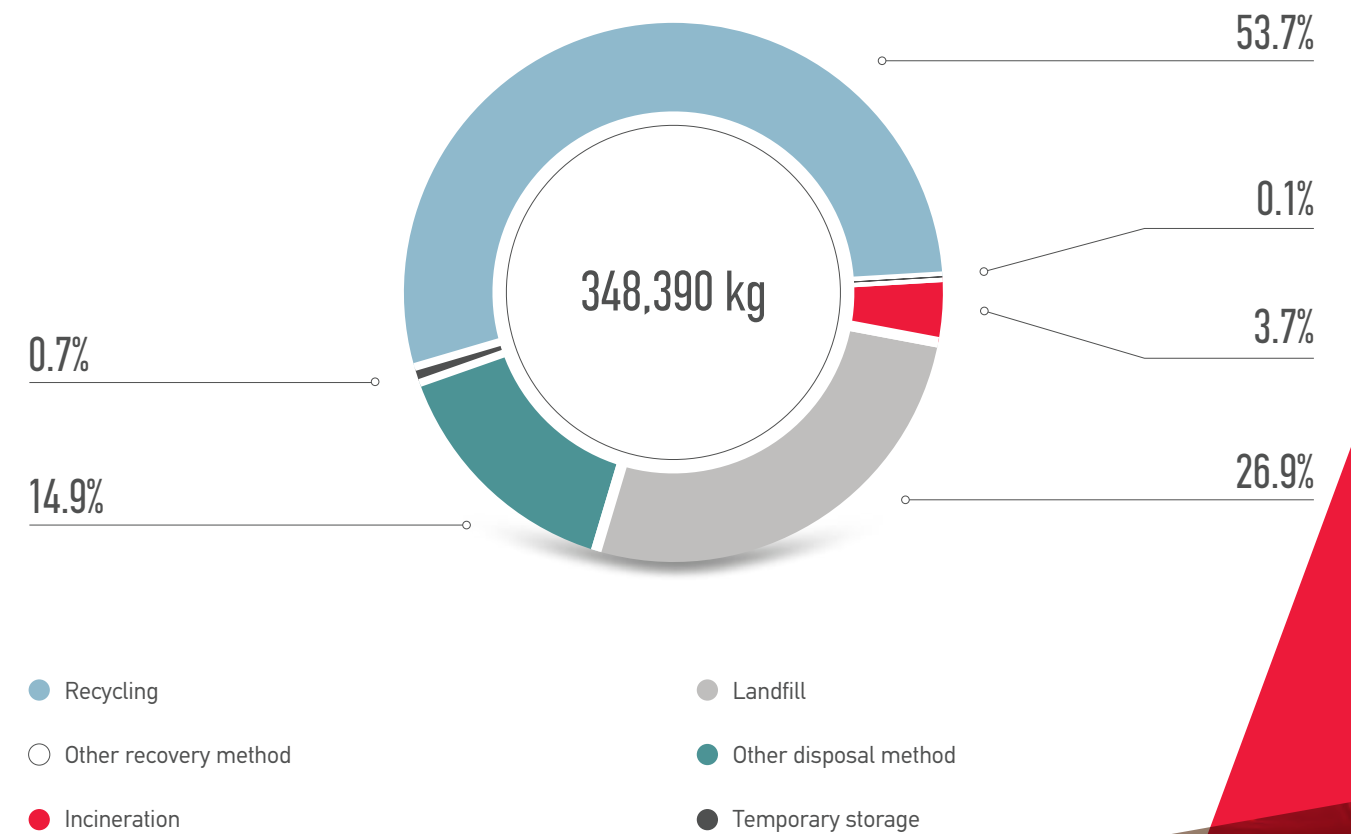
Out of the total amount of waste (hazardous and non-hazardous) managed by the Group or its subcontractors on behalf of third parties, 62.5% was recovered, 17.8% was disposed to landfill and 19.7% was temporarily stored.

Non - hazardous Waste Management



- Temporary storage
- Reuse
- Recycling
- Composting
- Other recovery method
- Incineration
- Landfill
- Other disposal method

Hazardous Waste Management



- Recycling
- Other recovery method
- Incineration
- Landfill
- Other disposal method
- Temporary storage

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

Non-hazardous Waste Category (kg)	Management Methods			Total Quantity
	Recovery (R)	Disposal (D)	Temporary Storage	
Paper	6,190.00	142.00	285.00	6,617.00
Scrap metal (iron & aluminum)	829,420	10.00	-	829,430
Plastic packaging / Pallet tanks	139,944	24,258	-	164,202
Tires	6,132	12,235	-	18,367
Waste from electrical and electronic equipment	42.00	-	-	42.00
Excavation waste	1,158,440,650	353,081,222	390,163,680	1,901,685,552
Demolitions waste	82,653,092.95	117,340	-	82,770,432.95
Mixed packaging	241,565.12	338,726	-	580,291.12
Mixed non-hazardous	863,008.5	603,233.56	-	1,466,242.06
Green waste	1,537,800	31,145	-	1,568,945
Wooden packaging / Pallets	41,210	206,660	-	247,870
Municipal waste	4,885	1,494,888	-	1,499,773
Other non-hazardous waste	30,906	217,315	240,000	488,221
Total	1,244,794,846	356,127,174	390,403,965	1,991,325,985

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

Hazardous Waste Category (kg)	Management Methods			Total Quantity
	Recovery (R)	Disposal (D)	Temporary Storage	
Used mineral oils	74,983	-	27	75,010
Lead-acid accumulators	2,008	-	1,000	3,008.00
Waste from electrical and electronic equipment	2,962.60	-	-	2,962.60
Lighting bulbs	491.90	632	-	1,123.90
Batteries	10,418	-	3.00	10,421.00
Contaminated Packaging	6,756	1,849	40.00	8,645.00
Toner	1,429	19.00	29.00	1,477.00
Contaminated Absorbent materials	1,589.00	284	150	2,023.00
Oil filters	1,167	850.00	1,000	3,017.00
Fats and oils	1,984	9,653	-	11,637.00
Medical waste	160.20	143.80	-	304.00
Laboratory waste	-	724.00	159.10	883.10
Waste inorganic chemical material	-	50,442	20	50,462.00
Bag filters	-	22.00	-	22.00
Fuel	80,820.00	-	-	80,820.00
Other hazardous waste	2,699	93,875	-	96,574.00
Total	187,468	158,494	2,428	348,390

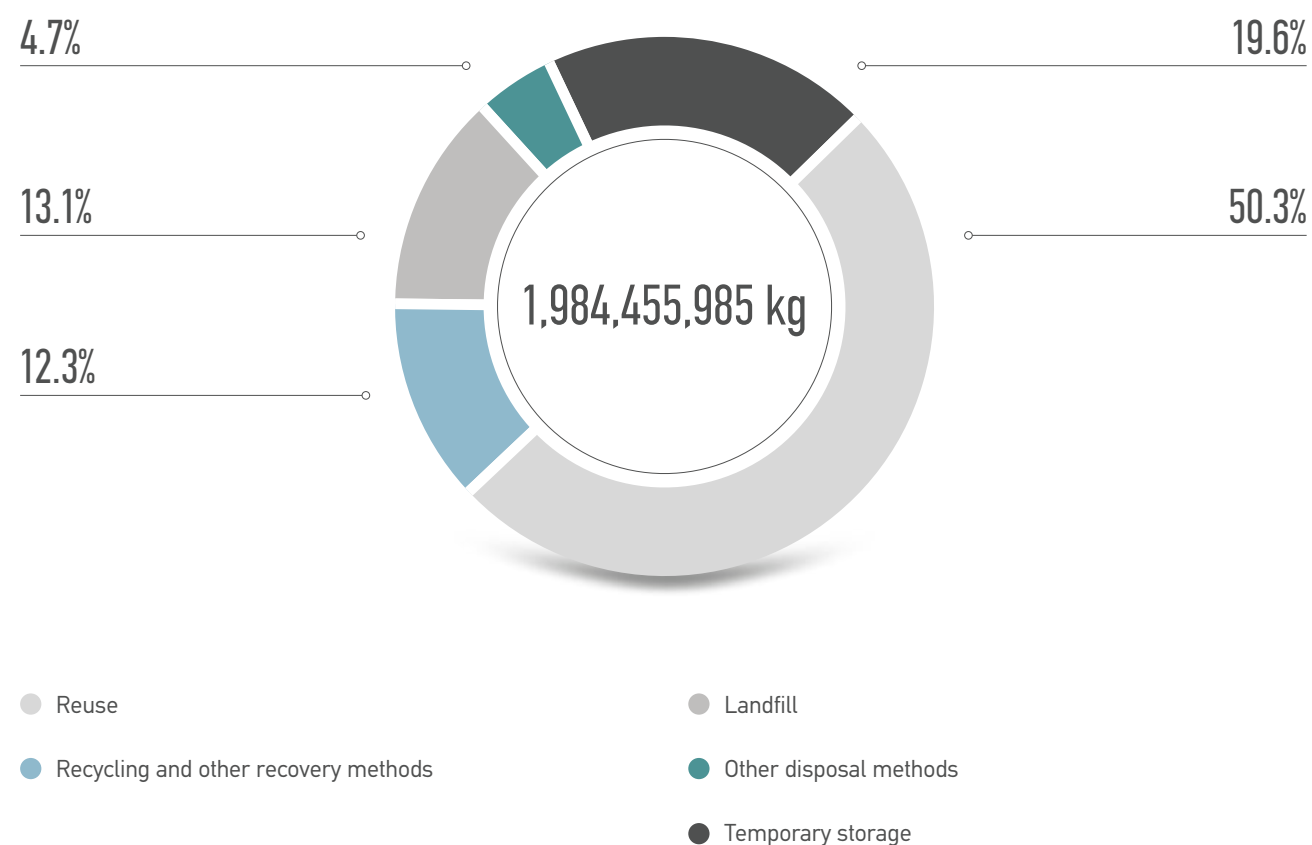
The management of specific waste, such as waste from electrical and electronic equipment, accumulators, used mineral oils, used vehicle tires, etc., is conducted through approved alternative management systems.

On the construction sites, there is integrated management of hazardous and non-hazardous waste in accordance with environmental management systems. The majority of waste is recovered and not disposed. A typical case is that of excavation products, which are reused in the project itself as such or after treatment in appropriate facilities (screening and crushing machineries), thus reducing the need for the supply of aggregates. What is not reused is made available for use in alternative management systems.

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 2021, 50% of excavation, construction and demolition waste were reused within the projects.

Any hazardous waste generated from construction activities is temporarily stored on-site in specially designated areas (covered areas with impermeable surface and surrounding safety guardrails), until they are led for recovery or disposal through licensed collectors to the final receivers.

Management of Excavation and Demolition Waste



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 is harmonized with the wider environment. In 2021, 800,000 trees and bushes as well as 78,000 sq.m. of turf have been maintained.

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 installment 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 Wildlife Conservation Society (ANIMA) in Greece, for the care of wild animals and birds that may cross the motorway. It is worth mentioning that in 2021, these companies allocated €1,000 to the "ANIMA" Wildlife Conservation Society, while the Hellenic Society for the Protection of Animals was allocated €6,200 to support the organisation in the collection and protection of stray and abandoned animals and the care of injured ones.

Also, MOREAS S.A. supports the Cultural Animal Welfare Association of Tripoli with the aim of collecting, feeding and protecting stray and abandoned 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 foreseen.

Specifically, in 2021, 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 sq.m., 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 Western Macedonia, in parallel with the construction of the two wind farms East and West Askio, the reconstruction and improvement of forest roads with a length of about 50 km, as well as the construction of technical works and crossings on these roads were implemented.
- In the Region of East Macedonia-Thrace, the reforestation of 40,000 sq.m. 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 construction and operation of the wind farms and taking into account that some of the Group's RES projects are located within Natura 2000 areas, in Special Protection Zone (SPA) or Special Conservation Zone (SCZ), or near an area with important avifauna, the Group proceeds, where possible, to modify the initial design of the wind farms, which includes:

- Selecting the appropriate type of equipment for optimal utilisation of the wind potential, with the installation of fewer wind turbines in order to reduce the environmental footprint.





















- Setting all medium voltage, and, where possible, all high voltage cables underground.
- Using the existing road network to the extent possible, in order to minimise intervention with the natural environment.
- Using new methods for the transport of large wind turbines sections, with the aim of reducing large road works (opening and expansion of forest roads) in forest areas.
- Continuously assessing the design and suspension of wind turbine sites when they are likely to cause problems in avifauna (e.g., Orpheus Eptadendros wind farm).
- Interrupting construction works during critical periods for the avifauna (e.g., reproductive period, etc.) in cooperation with the competent authorities.
- Instalment of bird strike prevention systems.

At the same time, a bird monitoring program 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 program is in place, annual reports are submitted to the competent authorities for evaluation.

For example, 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 is able to cease the wind turbine's operation and restart it once the bird is at an appropriate distance from the wind turbine (Stop Control module). Flight detection rates are high (>80%) as is the effectiveness of the actions.

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

RES projects in NATURA protected area and important areas for birds

Municipality	Location	Project type	Natura (SPA, SAC)
Alexandroupoli	Magoula Kazakou Diplon	Wind farm	SPA:GR1110010, SAC:GR1110003 
Arriana-Alexandroupoli	Orfeas-Eptadendros	Wind farm	-  
Argos-Mycenae Tripoli	Lyrkeio	Wind farm	SPA:GR2510004  
Grevena	River Smixiotikos	Small-scale hydro electricity	SPA:GR1310004 
Zitsa and Pogonio	Kasidiaris 1 Kranies - Karavamia-Elatos	Wind farm	-  
Kefalonia	Monolati-Kseroliba	Wind farm	SPA:GR2220006 
Kefalonia	Mount Agia Dynati	Wind farm	SPA:GR2220006 
Lesvos	Scamniouda-Ypsoma Pachys	Wind farm	SPA:GR4110010  
Lesvos	Scamniouda-Ypsoma Madeira	Wind farm	SPA:GR4110010  
Monemvasia	Mali Madi Metamorfosseos	Wind farm	- 
Monemvasia	Kalogerovouni-Poulos	Wind farm	SPA:GR2540007, SAC:GR2540001  
Monemvasia	Gkropes-Rachi Gkioni	Wind farm	-  
Pogonio	Kasidiaris 2 Agriachladia-Pr. Ilias-Petra Haidos-Diavolorrachi-Pr. Ilias	Wind farm	-  

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

Monitoring avifauna: 

Construction Segment

The company HELLENIC QUARRIES operates a quarry at "Mavra Vouna" area at the Municipality of West Achaia, in the location of "Limnothalassa Kalogrias, Dasos Strofylas & Eleos Lamias – GR2320001", which is included in the European Natura 2000 Network and protected areas (Special Areas of Conservation, and Special Protection Areas of Avifauna).

To ensure the protection of biodiversity, permanent monitoring of the area, as well as the following actions are implemented:

- 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. This procedure is taking place in consultation with the Managing Body of the Kotychi – Strofylia Wetlands.

TOMI carries out actions for reforestation and afforestation based on approved studies by the competent authorities, such as:

- "Comprehensive works and rehabilitation works at the wind farms Kasidiaris 1 and Kasidiaris 2" of the Municipal Unit of Pogonio of the Regional Unit of Ioannina of the Region of Epirus.
- Reforestation of a forest area designated by the Forestry Department of Thebes within the Local Community of the Municipal Unit of Dervenochoria and restoration of disturbed sites at the wind station of "Energy Synergy E.E." Local Community of Stefani, Municipal Unit of Dervenochoria, Municipality of Tanagra Regional Unit of Viotia.
- Restoration of the forest vegetation of the non-functional disturbed areas of the modified roadway of the "West Askio" wind farm, as well as additional plantings.



ELLAKTOR Group aims to create green infrastructures and produce energy from alternative sources, for a sustainable future for all





SOCIETY



33,592 hours of Health & Safety training and 28,463 15minute Health & Safety toolbox talks



Start of the e-learning platform and e-courses creation



€3,264 thousand contribution to Society



71.2% Revenues from Taxonomy-eligible economic activities



EMPLOYEE HEALTH, SAFETY & DEVELOPMENT

One of the Group's strategic pillars is the Health, Safety and Development of its employees and the employees of its subcontractors. Recognising the importance of its human resources, the Group has designed and adopted a series of actions and programs aiming at the continuous development of the knowledge and skills of its employees, as well as at assuring a healthy and safe working environment.

EMPLOYEE 'S HEALTH & SAFETY

Concern for Health and Safety (H&S) with regard to all the human resources employed by the Group is a basic part of its broader business policy and philosophy, while it commits to:

- Continuously comply with and improve H&S in the workplace, with the strict implementation of internal procedures and tools for Occupational H&S.
- Consultation and promoting employee participation in the design and review of H&S Management Systems.
- Comply with applicable national and European legislation and implement all other regulatory requirements, including required actions from inspection and control.
- Continuously train and raise the awareness of human resources on issues related to H&S in the workplace.
- Strengthen and reinforce the H&S culture at all hierarchical levels to prevent accidents.

The Group aims to minimise and eliminate accidents in all areas where it operates, through the prevention and occupational risk assessment, the adoption of appropriate measures, and the application of new tools in the field of Occupational H&S.

The Group's H&S Division, in collaboration with the H&S Heads of each subsidiary and the H&S Managers of the projects, implemented the following actions in 2021 with

the aim of ensuring and continuously improving H&S performance:

- Issuance of monthly and special Health & Safety Flashes for the projects / activities, with different topics each time, depending on the needs that arise, to train, inform and raise awareness of all employees. of all employees. In 2021, 85 Health & Safety Flashes were issued and communicated.
- Implementation of 15minute Health & Safety toolbox talks before the commencement of work, during which H&S issues related to the day's work are discussed, in order to ensure constant vigilance. In 2021, 19,486 15minute Health & Safety toolbox talks were held, a significant increase from the 8,264 held in 2020. This practice is also applied to the Group's subcontractors' construction team, where 8,977 meetings were recorded for 2021.
- Monitoring improvements / suggestions and Non-Conformances tool that includes deviations from established procedures and instructions, as identified in internal audits, in order to improve the follow-up process and closure of such deviations.
- Monthly H&S Report (MHSR) to monitor the key H&S performance requirements in the Group's projects / activities. In 2021, 1,290 MHSR were generated.
- Redesign and adoption of the 15 Inviolable Health and Safety Rules. The 15 Rules were announced to all employees by the Group's Top Management and were communicated by personal message to their corporate e-mail address. These H&S rules were the occasion for the training of the Group's human resources, with the support and cooperation of the Group's Head on H&S, H&S Managers and H&S Engineers / Coordinators. In 2021, 2,246 Group employees were trained in the 15 Inviolable Rules.
- Revision of the introductory training for office works, adaptation of the training material and creation of an e-learning course on the new e-learning platform of the Department of Human Resources.

- Design and implementation of the training "Actions in case of Earthquake" on the Group's e-learning platform, for the training of all employees.
- Monthly H&S meetings of the H&S Division with the Heads of H&S of the Group's companies. A minimum of twelve meetings were held in 2021. In addition, meetings were held between the companies' Heads of H&S and the projects' H&S Managers. A pilot program of monthly H&S meetings between Project's H&S Managers team, the central H&S Department and the Group's H&S Division was launched at AKTOR to present accidents, the progress of H&S tools and exchange best practices.
- Review of the investigation process, at AKTOR as a pilot program, with the appointment of a relevant team and the involvement of site managers in the process, to further strengthen management commitment.
- Revision of the Project Written Occupational Risk Assessment and Emergency Response Plan, due to the pandemic COVID-19, as well as of the new Group's Policy against Violence and Harassment in the workplace.
- Systematic recording of COVID-19 incidents by all Group 's companies. The procedure is implemented through a new online platform, where all the information relevant to COVID-19 is recorded.
- Monitor and inform workers who have been infected with COVID-19 or have come into contact with a confirmed case. Continuous communication and cooperation with the Group's Occupational Physicians and Safety Engineers.

It is estimated that in 2021 the total cost on actions for the protection of health and safety (e.g., for H&S equipment, personal protective equipment, measurements/checks, actions taken due to the pandemic, etc.) of the Group's employees amounted to €1,972,200.

Health and Safety Management System

In the context of creating a stable, healthy and safe working environment, the Group is implementing Certified Health and Safety Management Systems according to ISO 45001:2018.

The main elements of the H&S Management Systems are as follows:

- **H&S Organizational Structure**
In each project, depending on its size and nature, a Health & Safety Manager is appointed, who is supported by the central department of each subsidiary and supervised and guided by the Group's H&S Division. By the end of 2021, Health and Safety Managers had been appointed in 95% of the Group's projects.
- **Training and raising awareness**
H&S induction training, as well as training on specific work hazards, is systematically provided to the Group's employees, including its subcontractors.
- **Internal Audits**
They are conducted by certified internal auditors, based on an annual program, on the Group's projects and, randomly, on the subcontractors operating within them.
- **Communication and consultation**
This is achieved through the following tools: 15minute Health & Safety toolbox talks, incident investigation meetings, systematic meetings of the H&S Managers with the central departments, and monthly meetings of companies' H&S Head of the with the Group's H&S Division.
- **Management of accidents and near misses**
All incidents are reported and recorded and the investigating procedure is activated.
- **Health and Safety Management Plan for each project**
A H&S Management Plan is prepared for each project, as well as a Written Occupational Risk Assessment.
- **Emergency Response Plan**
An Emergency Response Plan is prepared, a Team is appointed and trained, and emergency preparedness drills are carried out.
- **Evaluation of subcontractors' H&S performance**
During the internal audits of the projects, a sample of subcontractors are also audited and evaluated in terms of H&S issues.

• Monitoring and Evaluation of H&S indicators

The Group records and monitors performance indicators (e.g., accident severity index, accident frequency index, training indicators, COVID-19 incidents, etc.) and sets targets for H&S and for the continuous improvement of H&S Management System.

An Occupational Physician is appointed at the Group's projects and activities, where required, to monitor the health and supervise the hygiene conditions of the employees, while a first aid team is appointed and a medical station recruited, depending on the size of the project.

For 2021, the Medical Team of the Group's companies ATTIKI ODOS SA / ATTIKES DIADROMES SA were awarded by the Hellenic Institute of Customer Service as "Heroes of the Year" for all the services they continued to offer in the face of the pandemic.

In order to promote the health of its employees, the Group is planning a well-being program, which will start to be implemented in 2022, and will include actions such as: on-demand seminars for the well-being and mental health of employees (nutrition, exercise, etc.), food corners with healthy snacks and fruit, reopening of the gym at the headquarters, participation in sports events, and systematic educational, informative and recreational events throughout the year.

Internal Audits

The central H&S Departments of the Group's companies conduct internal audits to the Group's projects and activities, including those of its subcontractors, based on the annual program with certified internal auditor's (IRCA) team, in the framework of the implementation of the HSMS, through which:

- potential non-compliance/deviations issues are identified and the appropriate corrective actions are implemented, and
- it is confirmed that the HSMS' operates sufficiently and that there are no H&S impacts which have not been identified and/or managed.

In 2021, internal audits conducted on Greek projects increased by 30% compared to 2020. Specifically, 113 H&S audits were carried out by the Group's team of certified internal auditors.

Across all Group companies, the number of audits conducted increased by 42% compared to 2020, confirming the commitment to continuous internal control and compliance with the applicable legislation and the Group's internal H&S procedures. Indicatively, 75% of the activities in the Concessions segment, 56% of the activities in the Environment segment and 70% of the projects in the Construction segment were audited. In 2021, the number of the Group's internal H&S auditors who attended the specialised seminar "Occupational Health and Safety Auditor / Chief Auditor" (IRCA certification) increased, with the number of inspectors now reaching 10. It should be noted that the Group aims to further increase the number of audits carried out, both in its operations and in its main Subcontractors.

Management of accidents

In case of an accident to a Group's employee or an employee of a subcontractor/supplier at a Group site, the Emergency Response Plan is activated in accordance with the HSMS and a series of actions are implemented in order to:

- immediately provide first aid to the victim
- announce the incident to the authorities
- inform the project/activity's management, the Human Resources Department, the companies' H&S Heads, the H&S Division, the Employer, and
- investigate the causes so that the company proceeds to corrective action to prevent a similar incident in the future.

For every accident, a relevant analysis and categorisation is carried out under the responsibility of the H&S Manager in cooperation with the Occupational Physician of each project / activity, depending on the type of injury and nature of the accident. All accidents are reported on the Ministry of Labour's online platform.

After each accident, the Group companies investigate the causes with the investigation team, which includes the Project Manager/Site Manager, the Head of H&S, the Safety Engineer, the victim and anyone else involved in the incident. The investigation team analyses the causes and then appropriate measures are taken, including any corrective actions needed to prevent similar incidents in the future. Following the analysis of the causes of accidents and if deemed necessary, a specific safety message is designed with the relevant topics and the Written Occupational Risk Assessment is revised, where required.

The objective of the Written Occupational Risk Assessment is to identify and recognise all types, forms, and causes of hazards, and to propose the necessary measures to reduce or eliminate them.

The risk assessment study for the Group's projects / activities is prepared so that its implementation reduces the possibilities of an occupational accident or occupational illness at the Group's workplaces by:

- Identifying the sources of risk generated at work and assessing the risks associated with these sources using a specific methodology. The aim is to record the measures that should be taken to protect health and safety of employees, taking into account the requirements of current legislation.
- Assess the risks in order to propose the most appropriate choice of equipment, organisation and layout of the workplace.
- Train all employees on these risks.
- Check the suitability of the measures applied.
- Prioritise actions if, following an assessment, it is determined that further action is needed.
- Assure that the preventive measures and working methods to be implemented, once the occupational risk assessment study has been designed and completed, will lead to a continuous improvement to the level of protection already provided to employees.

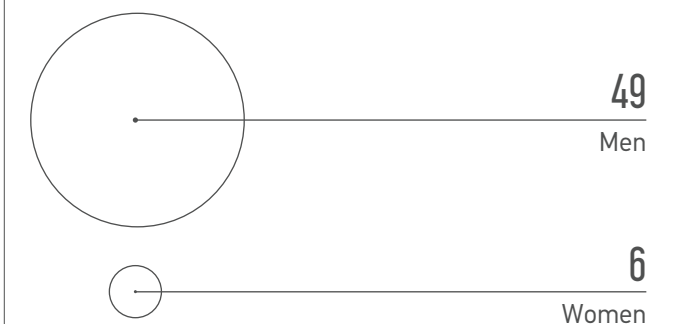
The occupational risk assessment covers all reasonably predictable risks arising from the work and from the areas where the works are carried out (stable installations, changing workplaces, mobile or temporary workplaces).

In accordance with the requirements of the Group companies' Health and Safety Management Systems, apart from accidents, "near-misses" are also recorded. "Near-misses" refers to sudden events in the workplace, where no employee injury, illness or physical harm takes place. Recording, reporting and analysing these incidents is important for the improvement of the existing HSMS and of the protection measures. In 2021, 40 near misses were recorded by Group companies, which records and the relevant corrective actions taken contribute to the prevention of future accidents.

Health and Safety Performance Indicators

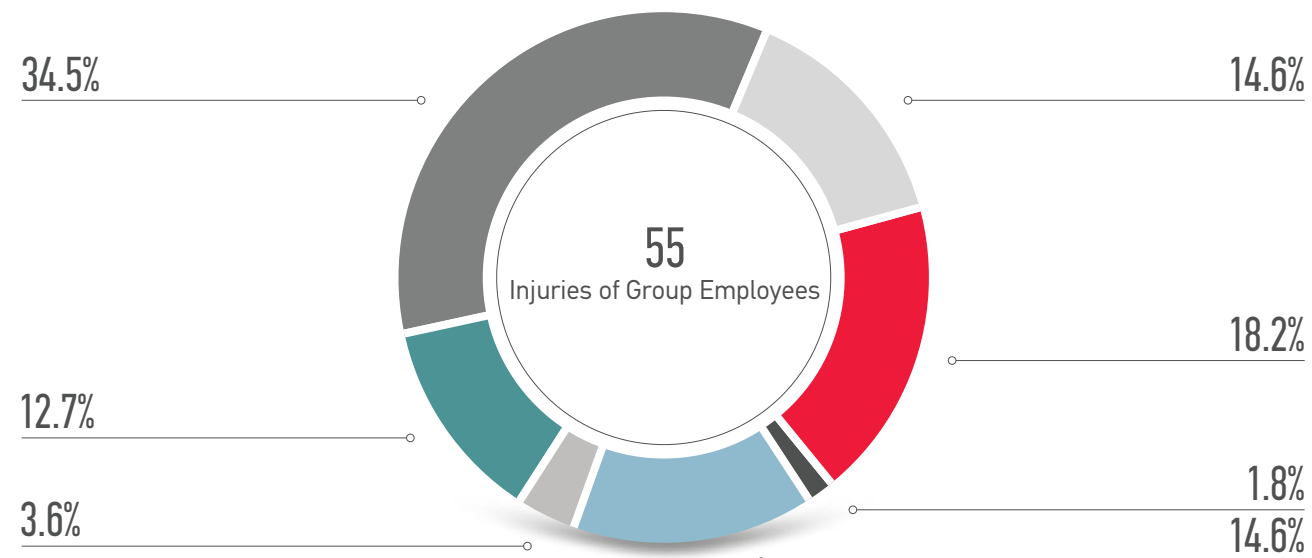
In 2021, ELLAKTOR Group companies recorded 55 employee accidents (excluding pathological and fatal accidents), of which 47 were minor and 8 were serious, while 7 of the total number of employee accidents were related to road accidents during transportation to / from work.

55
Injuries of Group Employees



Note: Excluding pathological and fatal accidents, as well as accidents with zero days of absence from work.

Accidents Causes / Nature



● Other causes (slips, trips, falling objects, etc)

● Transport to/from work

● Road accident during work

● Falling form heighth

● Operation of vehicles / Project machinery / Equipment / Tools

● Electricity

● Mechanical / Manual cargo movement

Regarding subcontractors' injuries, in 2021 there were 3 accidents (excluding pathological and fatal accidents), of which one was related to an accident with zero days of absence from work and one to a road accident during transportation to / from work.

On 1 April 2021, an accident occurred, resulting to the fatal injury of three (3) employees of AKTOR due to electrocution, during an improvement project (pole replacement) in an inactive overhead power transmission network.

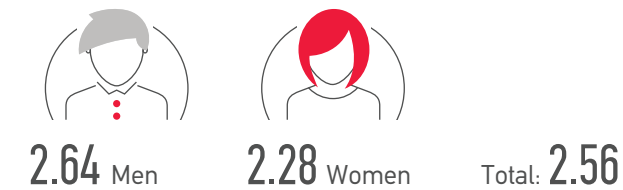
In order to avoid similar accidents, a series of actions have been decided and implemented:

- Strengthening human resources of the project's H&S Department.
- Increasing Safety Engineer and Coordinator hours on similar projects well beyond the requirements of the legislation.

- Issuing fifteen (15) Inviolable Health and Safety Rules and retraining employees on them.
- Implementing a specialised training course by a certified organisation for project employees and employees on similar projects for work under voltage and at height.
- Reviewing the H&S Management System and the Written Occupational Risk Assessment by an external partner specialised in the subject.
- Continuing the internal audit plan on all similar projects.
- Increasing the number of H&S meetings in electricity transmission network maintenance projects.

2020* Health and Safety Performance** Indicators for Group Employees

Accidents - Incidents Frequency Rate



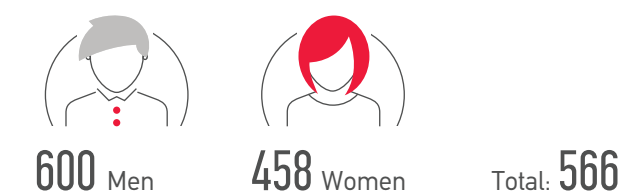
Accidents-Incidents Frequency Rate = (Total number of accidents / Total number of working hours) x 1,000,000. The index presents the number of accidents per 1 million working hours.

Accidents - Incidents Severity Rate



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

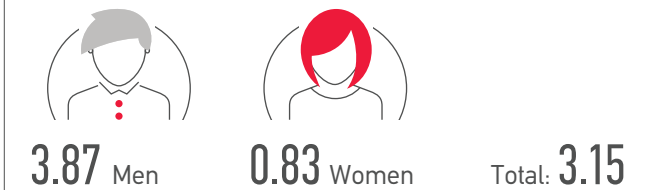
Accidents - Incidents Rate



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

2021 Health and Safety Performance** Indicators for Group Employees

Accidents - Incidents Frequency Rate



Accidents - Incidents Severity Rate



Accidents - Incidents Rate



* 2020 indexes were adjusted and calculated in calendar days instead of insurance days in order to use the same methodology as in 2021.

** The calculation of the indexes does not include fatal accidents, incidents due to pathological causes, minor first aid incidents, accidents with zero days of absence from work, as well as road accidents during transportation to/from work.

Training on Health and Safety

In order to ensure that employees are informed on H&S issues, as well as to optimise the efficiency of the procedures, continuous training of employees, including subcontractors' employees, is required. Throughout training, emphasis is placed on the impacts of non-compliance of employees with the relevant H&S rules and instructions, on the avoidance of accidents, while at the same time the benefit resulting from the mobilization and compliance of each individual is emphasized.

The Health and Safety auditors, during the audits conducted, identify, in collaboration with the individual managers, the training needs for employees with respect to Health and Safety issues in the different operating activities of the Group. In addition, each segment / project manager, in cooperation with the responsible H&S Head, is able to review the needs of the employees and submit recommendations for training to the Group's H&S Division. Training needs are also identified during the meetings of the Group's project / facility H&S Managers.

Each newly hired employee in all Group projects/activities receives the H&S induction and the 15 Inviolable H&S Rules training, is informed about the H&S policy and the HSMS in place, the persons responsible for safety (safety engineer, coordinator, occupational physician) and the risks of the work to be performed. All employees working at ELLAKTOR Group's head offices have access to the "Employees Health and Safety Guide of at Group Head Offices" through the portal, while employees at construction sites, among other things, are trained in Safe Working Instructions depending on the type of work they have to perform.

By the end of 2021, all the Group companies' H&S Heads were trained in H&S issues. Also, in accordance with the plan, the H&S Managers of the Group's projects/companies were trained (with internal and external training).

Among others, the following training programs were implemented:

- Fire Safety Drill to the Emergency Team of the ELLAKTOR Group Head Offices by the PYROGNOSI Institute (Hellenic Fire-Fighting Institute), lasting 4-5 hours, in order to ensure continuous training and preparedness in case of emergency. The drill was attended by 30 employees-members of the team.
- Training seminars on: Management of Fires in Indoor and Vehicles by the PYROGNOSI Institute (Hellenic Fire-Fighting Institute). The seminars lasted two days for each department and were attended by the Intervention Team and the Patrol Officers of ATTIKES DIADROMES S.A. and the members of the Emergency Team of ATTIKI ODOS / ATTIKES DIADROMES and Joint Venture of Maintenance of A.O. These seminars included theory and practice, and were attended by:
 - 80 employees of ATTIKES DADROMES with 610 training hours,
 - 7 employees of ATTIKI ODOS with 49 training hours, and
 - 6 employees of the Joint Venture of Maintenance of A.O. with 42 training hours.
- Fire Safety Seminars, of 6-hour duration by the external certified organisation "PYROGNOSI Institute", with the participation of 22 employees of HELEKTOR subsidiaries (OEDA FYLIS & BEAL S.A.).
- Fire Safety Seminar, of 8-hour duration, by the external certified organization "PYROGNOSI Institute", with the participation of 44 employees of the HELEKTOR subsidiary at the Mechanical Recycling and Composting Waste plant in Liosia.
- Live seminar, lasting 6-7 hours, of the Emergency Team of the ELLAKTOR Group Head Offices to 36 employees on the subject of First Aid & CPR using an automatic defibrillator, from the "PYROGNOSI Institute".
- First Aid seminar by external organizations (such as the Hellenic Institute for Occupational Health and Safety - ELINYAE, the RED CROSS, PYROGNOSI, EUROPEAN RESUSCITATION COUNCIL) in projects and facilities of HELEKTOR SA subsidiaries (VIAERIO, EDADYM, EMAK, BEAL, STERILISATION, OEDA FILIS, Chania site, etc.) to 78 employees with a total of 681 training hours.
- In addition, the two-year specialized training program (2020-2021) in the Hellenic Electricity Distribution Network Operator (HEDNO) projects of AKTOR in cooperation with ELINYAE was completed, on the topic "WORKING AT HEIGHT AT THE HEDNO OVERHEAD NETWORK AND ELECTRICITY" with a theoretical and a

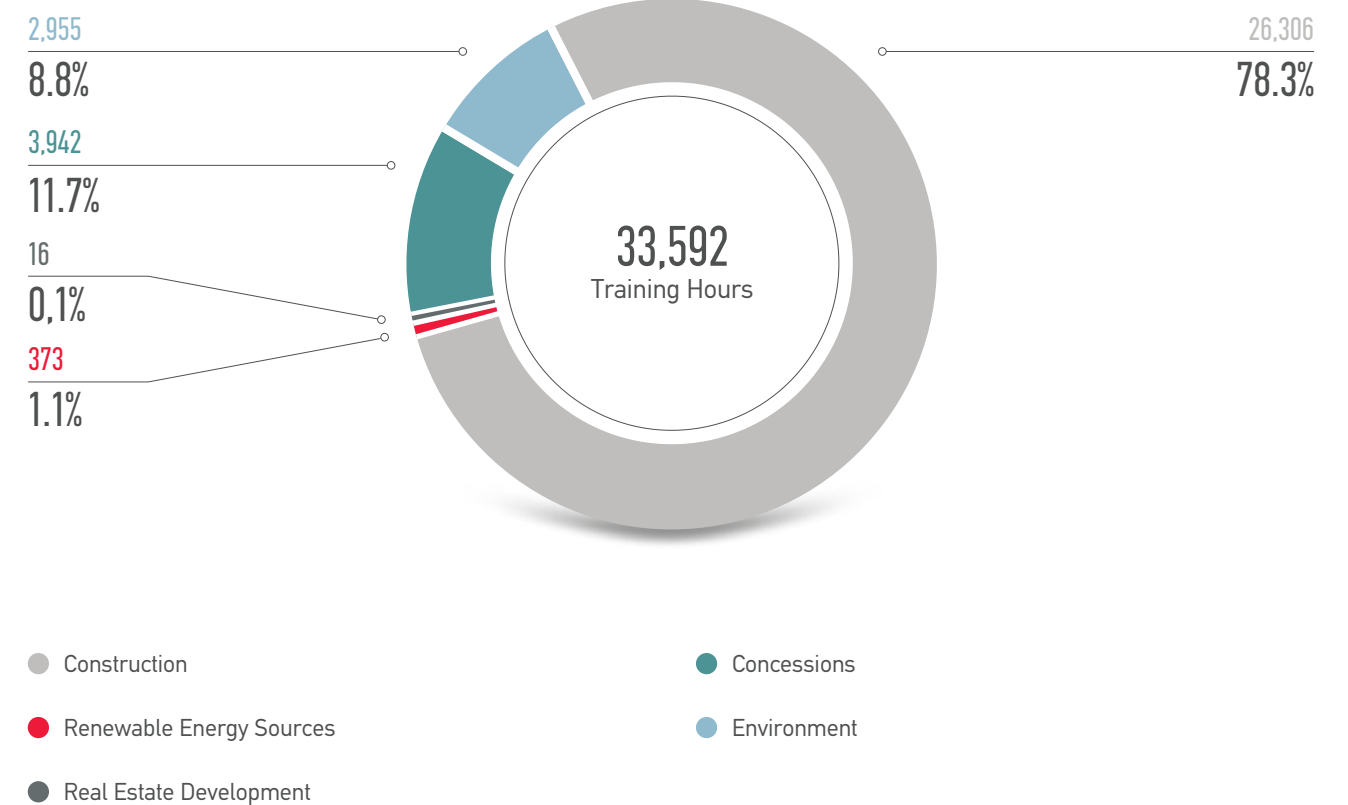
practical part. 101 employees of the HEDNO projects were trained, with a total duration of 1,224 training hours.

- Occupational Health and Safety seminars, of 8 hours duration, by an external certified body with the participation of 4 employees of TOMI SA and 1 employee of the Joint Venture TOMI S.A. - AP MARAGKAKIS GREEN PROJECTS S.A.
- Five-day in-person training, lasting 32 hours, by "ACTIVE POINT S.A." with the title "Manual Handling -

Fire Awareness - First Aid - Working at Heights", for the granting of certification by "GLOBAL WIND ORGANISATION (GWO)" to 4 employees of the RES Segment of ELLAKTOR S.A.

Finally, in the context of systematization of the recording of training courses attended by subcontractors' employees, relevant certificates are issued when the respective training courses are completed. The signed documents are checked during internal audits. According to the available data, in 2021, employees of the Group's subcontractors attended approximately 6,000 training hours on occupational health and safety issues.

Training Hours on Health and Safety Issues





ELLAKTOR Group's employees are the driving force behind the Group and its most significant comparative advantage

HUMAN RESOURCES

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.

Employees of ELLAKTOR Group

At the end of 2021 (31.12.2021) the Group employed **7,296¹** employees. 99% of employees are employed full-time and 79% have indefinite term contracts. 14% of employees work at the Group's Head Offices, while the majority of employees (86%) work at the Group's construction sites and individual projects.

The majority of the work is executed by Group employees and only a small percentage of the work (<10%) is executed by subcontractors. At the end of 2021 (31.12.2021), **578 subcontractor employees** were involved in Group activities and projects.

It is worth noting that 60% of employees and 65% of Management executives are from the local communities in which the Group operates.

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.

Human Resource Management

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

In this context, the Group has developed human resources indicators and a monitoring system regarding hiring recruitments and departures per Company and Division based on the project's progress.

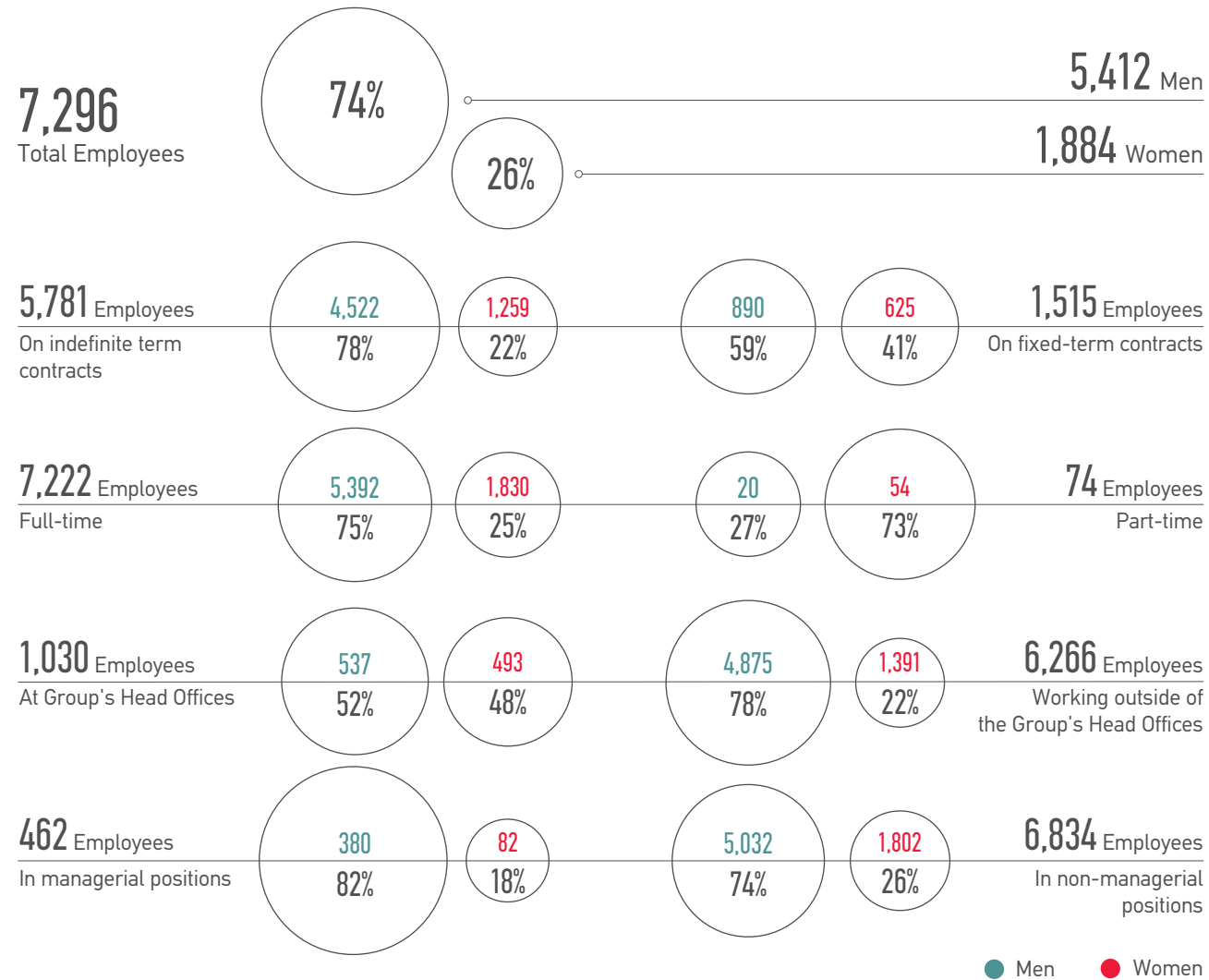
In 2021, the Human Resources Division has an essential role in the recruitment of personnel for Executives and Head Office positions, as well as in supporting the recruitment process of employees in production and other functional units of the Group. At the same time, the internal hiring process was strengthened to enable Group's employees to grow and evolve, fully utilising the knowledge and experience they already have. In 2021, 1,022 employees (800 men and 222 women) moved within the organisation to new positions within the same segment, while 109 employees (92 men and 17 women) moved to another segment. Of the 166 employees who were promoted, 23% were female employees.

Moreover, in 2021, the Human Resources Division updated some of its 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 and amended documents, which are used by the Group companies and posted on the internal (Portal).

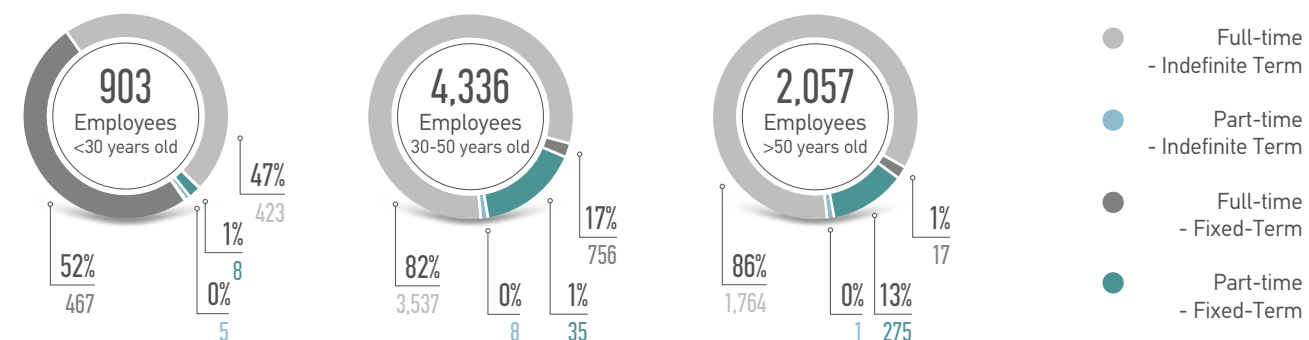
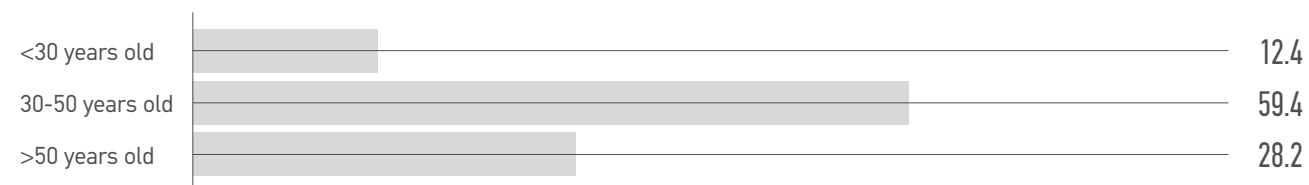
In addition, within the year:

- The Group's Performance Evaluation System was improved and adapted to the particularities of the headquarters and production.
- More employees joined the Group's insurance cover age (2,997 compared to 2,700 covered previously).
- The travel insurance program was extended for all employees travelling for business purposes outside Greece, as was the insurance program for executives and their family members working permanently abroad.
- The pension program for the Group's executives continued.

ELLAKTOR Group Employment Data



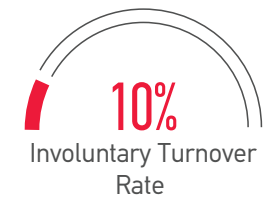
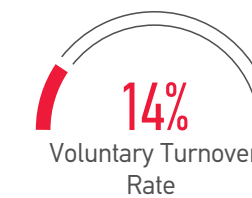
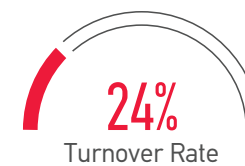
Employees per age group



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.

Compared to 2020, the total number of employees remained in the same levels, while the percentage of female employees increased from 24% in 2020 to 26% in 2021, as well as the percentage of women in managerial positions, which reached 18% compared to 17% in 2020. In addition, the percentage of female employees on permanent contracts increased from 20% in 2020, to 22% in

2021 and the percentage of female employees that were hired for 2021 increased to 25% compared to 2020 (24%). Furthermore, the percentage of employees aged >50 years increased from 26% in 2020 to 28% in 2021, while the percentage of employees aged <30 years decreased from 15% in 2020 to 12% in 2021.

Training and Development of Employees

The training and development of the Group’s employees is one of the most important pillars for achieving its corporate goals. The training programs implemented by the Human Resources Division in cooperation with the Group’s Divisions are recorded, evaluated and updated so that they are up-to-date and readily available to all employee groups.

The modernisation and restructuring of the Group have created needs for further specialised training, both at the level of the Group’s Head Offices and at the level of projects/activities that cannot be covered by traditional forms of training. In this context, the Group developed an e-Learning platform, as well as appropriate educational material (e-courses), in collaboration with the relevant Divisions. This initiative contributes to the creation of a unified culture in the Group, as all employees will share the same information, which they will be able to use in the workplace and in their daily lives.

Induction Training Manual

The Induction Training Manual was updated in 2021. The manual, which will be posted on the Group’s Portal, will be available to both existing employees and to new recruits.

The 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

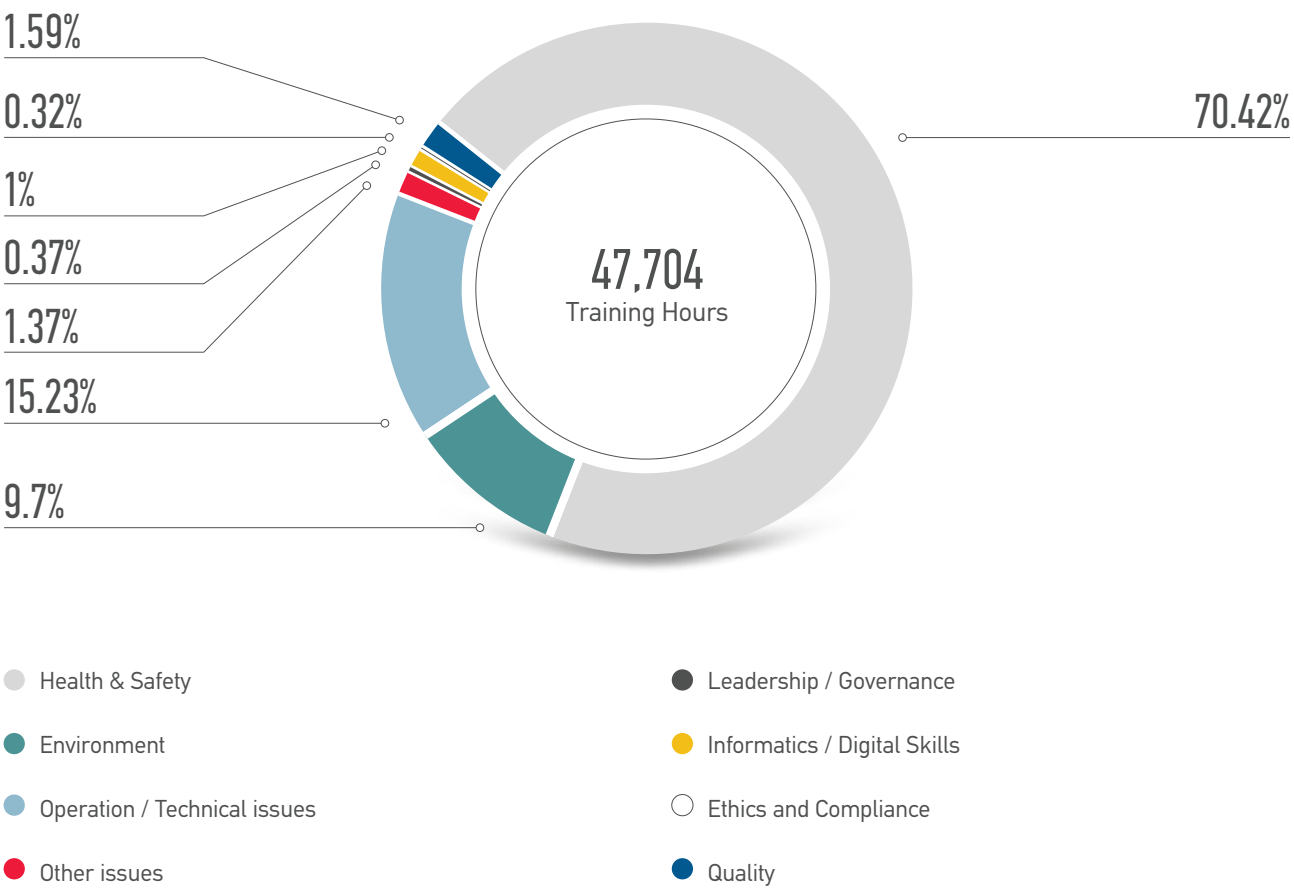
The Induction Training Manual provides new employees with useful information, ensuring a smooth and productive transition.

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, especially in regards to health and safety as well as environmental management issues.

In 2021, 47,704 training hours were carried out (38,729 for men and 8,975 for women). It is estimated that the average training per employee was 6.54 hours (7.16 for men and 4.76 for women), increased compared to 2020, where the average training was 5.98 hours (6.69 for men and 3.73 for women), showing actively the Group’s commitment to continuous training and education of its human resources.

The total expenditure of employee training for the year amounted to €13,222.

Training Topics



Training Topic	Training Hours
Health & Safety	33,591.92
Environment	4,627.9
Operation / Technical issues	7,266
Other issues	657
Leadership / Governance	175
Informatics / Digital Skills	476
Ethics and Compliance	150.5
Quality	759.8
Total training hours	47,704

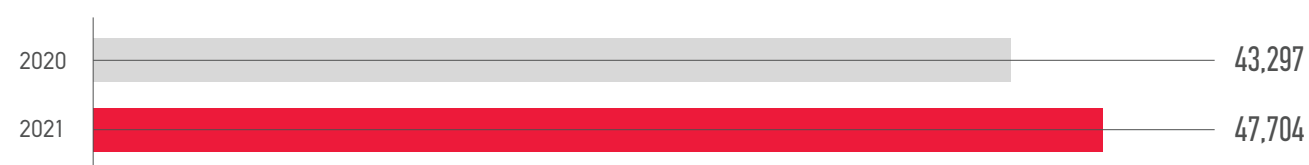
AKTOR CONCESSIONS & ATTIKES DIADROMES

Significant increase in the average training level of employees

In 2021, the Group companies, AKTOR CONCESSIONS and ATTIKES DIADROMES, recognising the importance of empowering their employees, achieved a significant increase in the average training hours for 2021. More specifically, at AKTOR CONCESSIONS employees received an average 6.5 hours of training compared to 2020 where the average hours amounted to 0.18. In

addition, for 2021 at ATTIKES DIADROMES, the average training hours was 6.93, from 3.25 in 2020. It is worth noting that a significant increase was also recorded in the average training hours of women employees of the two aforementioned companies, where in AKTOR CONCESSIONS the average training hours was 8.83 for 2021 (0.34 average training hours for 2020), while in ATTIKES DIADROMES the average training hours of women employees for 2021 was 5.23 hours (2.11 average training hours for 2020).

Training Hours



Due to the complexity of the Group's and the individual companies' activities, each company/company division requires a different type of specialised training. For example, the companies ATTIKI ODOS and ATTIKES DIADROMES organised trainings/participated in conferences on the following topics:

- Open space and vehicle fire management training and firefighting drills.
- Customer service.

- Theoretical and practical training in toll collector's duties.
- Training of new patrol officers and emergency response teams.
- Snow removal exercise.
- Seminar on strengthening team spirit.

Increasing the percentage of training on environmental and operational/technical issues

In 2021 ELLAKTOR Group, aiming to develop a corporate culture on environmental protection and management issues, implemented a series of training courses and briefings on environmental issues. As a result of this ongoing effort, the percentage of environmental training

increased from 1% in 2020 to 9.7% in 2021.

Furthermore, recognising the need to develop and further improve the skills of employees in specialised operational and technical matters, in 2021 ELLAKTOR Group undertook a series of trainings which resulted in an increase in the percentage of training in operational/technical matters from 8% in 2020 to 15.2% in 2021.

Employees Performance Evaluation

In 2021, a Performance evaluation was carried out on a specific number of employees and the results of their efforts in 2020 were evaluated.

The evaluation included employees of the Head Offices and the Directors and Supervisors employed by the Group and its companies in Greece for at least 3 months in 2020 (with the exception of ATTIKI ODOS and MOREAS, which have their own employee evaluation system).

Aiming to enhance the process, the 2021 "Performance Evaluation" will be held in 2022, using a new system, even more interactive. While facilitating the monitoring of the progress of the reviews and enabling the creation of useful reports.

In 2021, a total of 1,950 Group employees (1,306 men and 644 women) were evaluated, i.e. 26.73% of all employees. The employees selected to take part in the evaluation process were all employees at the Group's Head Offices and the Managers and Supervisors at construction sites and operations.

Group Employee Performance Evaluation process

The Group launched a 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's Management during the design of the evaluation system. Each skill was analysed based on the behaviors that evaluated employees should demonstrate in their daily work.

Two different evaluation forms were created, one for 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 evaluations were created, accompanied by educational meetings held, both in person and online. The evaluated employees were informed about the process by their supervisors and received a relevant information leaflet.

- **Employee Form:** Evaluation based on 5 Skills analysed in behaviours:

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

- **Executive Form:** Evaluation based on 6 Skills analysed in behaviours:

1. Efficiency
2. Health and Safety
3. Interpersonal relationships
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 for human rights is a non-negotiable value. In early 2021, a Group Human Rights Policy was established, which sets the framework and principles and aims to ensure equal opportunities and human rights for the Group's employees and the employees of its suppliers and subcontractors, as well as for 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 2021, three people with disabilities (male) were employed in the Group. All employees are over 18 years of age, while 16% of the Group's employees have a different nationality than the country in which they are employed.

The monthly reports of the Human Resources Division include the recording of the demographic data (gender, age) of the Group's employees, which are used to analyse and evaluate the current situation. It is noted that for 2021, no incident of discrimination was recorded.

ELLAKTOR Group is aligned with and follows the labour legislation. Aside from ensuring salaries comply with the National Collective Labour Agreement (NCLA), the Group follows and implements the clauses applies what is envisaged by the labour legislation regarding working hours, work schedules and the payment of the prescribed gifts/benefits. 65% of employees are covered by the National Collective Labour Agreements in force in each country of operation covered by this Report.

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

In 2021, 87 employees of ELLAKTOR Group were entitled to maternity leave and 76 of these made regular use of it. 88% of the employees who were expected to return from maternity leave returned to work normally. 78% of the employees who returned from maternity leave remained in the Group at least 12 months after their return, while the employees who did not remain in the Group left voluntarily (termination of contract or resignation).

Employee Benefits

The Group reviewed the level of employee compensation and benefits, with the aim of making them more competitive in relation to the Greek market, smoothing out any discrepancies.

The Group provides its employees with a group life and health insurance program, as well as medical coverage. In addition to the Group's employees, their dependants are also entitled to participate.

In addition, Group companies voluntarily offer a series of benefits, including:

- 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.
- Free transportation by company bus, during arrival and departure hours from the Group's Head Offices and certain projects for the convenience of employees.

Furthermore, the Group participates in sports activities for its employees, aiming to encourage teamwork and enhancing the mental and physical health of its employees.

An annual Christmas party is organised for the families of employees, while the children of the Group's companies employees have the opportunity to stay in children's summer camps.

In 2021, due to the special circumstances caused by the COVID-19 pandemic, no Christmas party was organised for the employees' children, but gift vouchers were given to all the children of the Group's employees during the year. In addition, having taken all precautionary measures, a Christmas party was organised after two years, on the ground floor of the main building. During the event, the employees of the headquarters and the Group's Management exchanged greetings, were photographed in a specially designed photo booth and shared beautiful festive moments, as an opportunity to further strengthen their collegial bonds.

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 who stand out with their performance.

SOCIAL RESPONSIBILITY

ELLAKTOR Group, leveraging its diversified portfolio of activities, focuses on the development of new and innovative projects, which contribute towards developing and improving the quality of life. The Group supports the Greek economy and creates value, part of which is returns to society. It seeks to always be close to society, listening to its needs and expectations and responding to them with professionalism, dignity and respect, building relationships of trust and supporting the local communities in which it operates.

CREATION AND DISTRIBUTION OF ECONOMIC VALUE

The most material issue for ELLAKTOR Group, as emerged from the analysis of the material topics, is the creation and distribution of economic value, as it ensures its business continuity, increases its positive impact on society and returns value to its stakeholders.

The Group contributes to the welfare of society through its business operations and the implementation of specific social actions, always aiming at the best possible response to society's expectations.

2021 Group Financial Results

The Group's consolidated net sales, from all its activities in Greece and abroad, for the fiscal year 2021 amounted to **€915,482** thousand. The consolidated financial data of the Group for the 2021 fiscal year reflects the following key indicators:

- Assets: **€2,835,044** thousand
- Liabilities: **€2,471,737** thousand
- Equity: **€363,307** thousand

The Group's **2021 Annual Report**, which includes the Board of Directors' Report and the Annual Financial Statements, is available on the Group's website.

Economic Value 2021 (thousands €)	ELLAKTOR Group
Net sales	915,482
Financial income, other income and profits	60,348
Economic value created	975,829
Operating cost	695,779
Employees' salaries and benefits	
• Salaries and Wages	137,601
• Social insurance expenses	28,673
• Cost of defined benefit programmes	3,435
• Other benefits to employees	11,994
Payments to capital providers	107,989
Payments to government agencies	45,490
Contribution to Society	3,264*
Economic value distributed	1,034,226
Economic value retained	(58,397)

*The amount refers to donations (financial and in kind), as well as to sponsorships for activities with social benefit and it includes €2,349 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.



Disclosures according to EU Taxonomy

With the adoption of the Green Deal in 2019, the European Union (EU) set the course for more sustainable investment, with the aim of achieving a climate-neutral economy in the EU by 2050.

In order to achieve the objectives of the Green Deal, the EU established the 'Taxonomy Regulation' (EU Regulation 2020/852 hereinafter 'the Regulation'), which was adopted in June 2020 and establishes the criteria by which it can be determined whether or not an economic activity is characterised as environmentally sustainable, as well as the degree to which an investment is environmentally sustainable.

According to the European Taxonomy Regulation, an economic activity can be considered environmentally sustainable if:

- It contributes significantly to the achievement of one or more of the following six environmental objectives:

1. Climate change mitigation
2. Climate change adaptation
3. The sustainable use and protection of water and marine resources
4. The transition to a circular economy
5. Pollution prevention and control
6. The protection and restoration of biodiversity and ecosystems

- It should also 'do no significant harm' (DNSH) with regard to any of the other five environmental objectives.

- Meets minimum social safeguards (i.e. be exercised in accordance with the minimum safeguards with regard to OECD guidelines for multinational enterprises and the guiding principles of United Nations regarding businesses and human rights, including the principles and rights set out in the eight fundamental conventions identified in the International Labour Organisation declaration regarding fundamental principles and labour rights, as well as in the International Charter of Human Rights).

- Complies with the technical screening criteria of the Taxonomy Regulation.

In accordance with Regulation 2021/2139/EU, issued on 4 June 2021, technical screening criteria are established for determining the conditions under which an economic activity is considered to contribute significantly to the first two environmental objectives: climate change mitigation and climate change adaptation.

Eligible activities

In accordance with Article 10 (2) of Delegated Deed No. 8 (Delegated Regulation (EU) 2021/2178), as of January 2022, non-financial corporations must make reference in their 2022 disclosures to financial year 2021 and the percentage of their activities that are eligible for classification in accordance with Article 1 (5) as well as activities not eligible for classification pursuant to Article 1 (6) of the Delegated Regulation, in relation to indicators of sales, capital expenditure and operating expenditure against total sales, capital and operating expenses.

The table below shows the percentage of sales, capital expenditures and operating expenditures of the Group that correspond to the Group's financial activities which were deemed eligible for EU Taxonomy purposes in accordance with the description of these activities, also taking into account the corresponding NACE activity codes, as set out in Delegated Regulation 2021/2139/EU. Entering the first period in which the Taxonomy framework is applicable (1 January - 31 December 2022), the financial activities of the Group were examined and included or excluded solely on the basis of eligibility.

	Turnover	Capital expenditure (CapEx)	Operating expenditure (OpEx)
A. Eligible Activities according to the Taxonomy	71.18%	58.25%	83.18%
CONSTRUCTION			
5.1. Construction, extension and operation of water collection, treatment and supply systems	3.69%	1.67%	0.38%
5.4. Renewal of water collection, treatment and supply systems	1.65%	0.17%	0.27%
5.5. Collection and transport of non-hazardous waste in source segregated fractions	1.26%	1.55%	2.38%
6.1. Passenger interurban rail transport	6.36%	7.83%	1.87%
6.10. Sea and coastal freight water transport, vessels for port operations and auxiliary activities	1.14%	1.46%	0.44%
6.15. Infrastructure enabling low-carbon road transport and public transport	13.03%	10.27%	3.06%
7.1. Construction of new buildings	1.07%	0.68%	0.15%
7.2. Renovation of existing buildings	1.78%	0.84%	0.21%
7.3. Installation, maintenance and repair of energy efficiency equipment	0.08%	0.00%	0.00%
7.5. Installation, maintenance and repair of instruments and devices for measuring, regulation and energy performance of buildings	0.26%	0.00%	0.00%
7.6. Installation, maintenance and repair of renewable energy technologies	0.90%	0.00%	0.00%
Other Taxonomy-eligible economic activities	0.85%	0.27%	0.09%
CONCESSIONS			
6.15. Infrastructure enabling low-carbon road transport and public transport	24.29%	8.31%	25.71%
RENEWABLE ENERGY SOURCES			
4.3. Electricity generation from wind power	11.42%	14.41%	45.71%
4.5. Electricity generation from hydropower	0.12%	0.01%	0.00%
ENVIRONMENT			
4.3. Electricity generation from wind power	0.18%	0.16%	0.00%
5.9. Material recovery from non-hazardous waste	0.69%	2.88%	0.39%
5.10. Landfill gas capture and utilization	2.40%	7.76%	2.50%
B. Non-eligible- activities according to Taxonomy	28.82%	41.75%	16.82%
Total (A + B)	100.00%	100.00%	100.00%

Taking into account the above, this report presents the following:

Percentage of Turnover: Turnover related to taxonomy-eligible economic activities (numerator), by net sales amount (denominator) for the financial year 2021. The denominator is based on consolidated turnover, in accordance with (IAS) 1.82 (a). Specifically, the total turnover of the Group are reflected in “Turnover” in the Group’s Annual Financial Statements (Consolidated and Corporate), in the Income Statement.

Percentage of annual capital expenditure:

Taxonomy-eligible capital expenditure (numerator) divided by total capital expenditure (denominator). Total capital expenditures are recorded under ‘Purchase of tangible and intangible fixed assets and investments in real estate’ in the Group’s Annual Financial Statements (Consolidated and Corporate), in the Cash Flow Statement.

Percentage of annual operating expenditure: Taxonomy-eligible operating expenses (numerator) divided by total Taxonomy capital expenditure (denominator).

The definition of the European Taxonomy System with regard to respective operating costs includes the cost of renovating, maintaining and repairing buildings, as well as any other direct costs associated with the day-to-day maintenance of property, plant and equipment. The relevant expenses for the Group are included under the lines ‘Cost of goods sold’, ‘Administrative expenses’ and ‘Distribution expenses’ in the Group’s Annual Financial Statements (Consolidated and Corporate), in the Income Statement. More specifically, it is reflected in the line ‘Expenses for repair and maintenance of property, plant and equipment’ in Note 30 ‘Expenses per category’ in the Annual Financial Statements (Consolidated and Corporate) of 31 December 2021.

The accounting policies related to the compilation of the above table are presented in note 2 ‘Summary of significant accounting policies’ in the Annual Financial Statements (Consolidated and Corporate) of 31 December 2021. These consolidated and company financial statements have been prepared in accordance with the International Financial Reporting Standards (IFRS) and the Interpretations of the International Financial Reporting Interpretations Committee (IFRIC), as adopted by the European Union.

This section is presented for the first time in the Group’s Sustainable Development Report, in compliance with the provisions of EU regulations 2020/852, 2021/2178 and the

2615/10.11.2021 and 209/31.01.2022 letters of the Securities and Exchange Commission. In this regard, the Group has interpreted the relevant directives and since the relevant legislation governing the European Taxonomy is constantly evolving, it monitors any changes in order to properly adjust its approach and the disclosures it publishes for the general public.

CONTRIBUTING TO THE CREATION OF SUSTAINABLE CITIES & COMMUNITIES

ELLAKTOR Group creates infrastructures that contribute to the achievement of sustainable development and the empowerment of local communities. It analyses and assesses the risks pertaining to its operation and projects and takes precautionary measures, in order to minimise risks, manage emergency situations and ensure the uninterrupted operation of the areas in which it operates.

Safeguarding the 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, and has received 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 2021, as 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 the safety of users during the COVID-19 pandemic, the following measures were implemented on the ATTIKI ODOS and the MOREA motorway:

- Press releases and informative emails to subscribers/drivers proposing that payment at toll stations should be executed by credit card or via electronic transponders instead of cash, to protect both employees and drivers.
- During the lockdown, 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 electronic transponders were recharged electronically.
- 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 15,200m² area, which was completed in November 2019, took into account the specifications of the EL0T 1439:2013 standard. In May 2022, the company proceeded with the certification and expansion of the Park in accordance with the standard, aiming to include all the park facilities in 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 for all lifting equipment (lifts, escalators and stairs) used both by visitors and employees of the Smart Park, are renewed annually in accordance with the Law.

Additionally, the Smart Park playground, which is accessible to all to visitors, is certified in accordance with 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. The supply of 4 more defibrillators is planned by the end of the first half of 2022.

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, most members of which 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:

- Automatic disinfection system using the UV technology “Air Sterilizer” in the passenger lift cabin.
- Automatic disinfection system using “Ultra UV Pro” technology for the railings of the 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 communal areas of the Park.
- Placing signs at the entrances of public elevators with information on who is allowed to use them and the maximum number of passengers allowed according to state regulations.
- Installation of an audio message, which is repeated every 7 minutes through the Park loudspeaker, informing on social distancing among visitors and on 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 0 to 10. No relevant survey was conducted in 2020 and 2021, due to the pandemic.

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 construction projects. The effective management of the requirements is achieved by establishing appropriate inspection procedures, integrating them into the Quality Management Systems in accordance with ISO 9001:2015 and allocating appropriate resources (personnel, equipment, materials, external associates, etc.) to ensure their effective implementation. 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 programs 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, and they guarantee the integrity of the process and the results of the inspections performed.
- Materials and products are only utilised if they comply with the basic requirements (legislation, safety and health, etc.). Their compliance with requirements is proven by the documentation provided from the respective manufacturers/suppliers (e.g. performance statements, lab results, etc.).

The control procedures are regularly evaluated by the quality engineers and the Group's Quality Management Department to ensure that the relevant requirements are being met.

Indicatively, in the Concessions segment, ATTIKES DIADROMES conducts regular checks and inspections on 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 2021, to ensure the safety of constructions for three projects. The total cost of these reworks amounted to €3,658,693 which corresponds to 0.37% of the Group's turnover.

Improving the Urban and Built 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 emblematic projects, including as Line 2 of the Athens Metro, the "Golden Line" of the Doha Metro in Qatar, the **Acropolis Museum**, the National Gallery, the **Rio-Antirrio Bridge**, the Psytalia Wastewater Treatment Plant, the First Section of the Trans Adriatic Pipeline (TAP), the COSMOTÉ office building (LEED GOLD), the Group's Head Office building (Green Building), and the ALPHA BANK building (Bioclimatic) and continues with investments in new projects such as the development,

operation and management of Alimos Marina and **Cambas Park**, one of the biggest investment projects in Attica, with a budget of €200 million. The aim of the projects is to improve the quality of life of people and local communities, with the aim of protecting and upgrading the urban environment.

All projects are constructed in accordance with 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 5 million visitors in 2021). 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, in accordance with 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.

Concessions Segment

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 2021, 127 24-hour measurements were made using mobile noise measurement units. Based on the measurements, there was no need to install further sound barriers. Overall, 21km of noise barriers and motorway embankments have been installed throughout the 20-year operation of the motorway.

Respectively, MOREAS monitors road traffic noise indicators on an annual basis. Any requests from 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 2021, 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 2021, no exceedance of the established noise limits has been recorded.

Construction Segment

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. For example, in 2021, in the AKTOR "Thessaloniki Metro-Base Line" and "Thessaloniki Metro-Extension to Kalamaria" projects, 109 twenty-four hour and 60 four-hour noise measurements were performed. 2 hourly background limit exceedances were recorded, irrelevant to construction site works.

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,
- proper placement of equipment and orientation of project machinery to reduce noise emissions,
- refraining from conducting disrupting/noisy works during communal quiet hours, and
- avoiding simultaneous operation of project 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 2021, 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.

RES segment

The noise generated during the operation of a wind farm is mainly either aerodynamic, coming from the rotation of the blades, or mechanical, coming from the turbine's speed multiplier. Regarding the projects of the RES segment of ELLAKTOR Group, during the design of wind farms, noise studies are carried out in order to minimise the relevant impacts. In particular, for the assessment of the noise level in the wider area of each wind farm, the Group uses the WINDFARM software, which integrates the Danish model, where broadband analysis is performed. Key parameters such as the dimensions of the wind turbines and the noise emission characteristics at the hub height are taken into account during the modeling and parameters such as wind speed, ground attenuation and transmitter-receiver distance are defined. When applying the model, strict terms are used to estimate the noise level under the most unfavorable conditions. In addition, to further reduce the level of emitted noise during the operation of large-scale projects, special equipment with serrations on the surface on the surface is installed on the blades of the wind turbines to reduce the aerodynamic noise, due to the passage of wind through and around the turbine blade, which is already at low levels due to the technologically advanced design.

It is worth noting that the RES segment takes all necessary measures and tries to limit the noise level that may be caused by the construction and operation of wind farms and that the noise level is always below the statutory limits, as defined in the current legislation (1418 B/2003, 286 B/2007, Government Gazette 293 A/1981, Government Gazette 2464 B/2008).

Communication 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.

Engagement with local communities is an ever-evolving effort to understand and respond to their needs through dialogue and cooperation, where possible.

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 planning and implementation of the projects following consultation with the local community and taking into account its needs and expectations. In the context of 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 promotion of the preserved facilities of the historic winery of Cambas in Pallini with a modern mixed-use development.

Corporate Social Responsibility Actions

ELLAKTOR Group, recognising the importance of society as a whole and responding to its needs, undertakes initiatives to support society and vulnerable social groups.

In 2021, ELLAKTOR Group donated €3,264 thousand as part of its CSR program.

The Group's social action, both locally and nationally, focuses on the following 8 thematic categories:



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



Environment

The Group uses 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 programs 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 programs 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.



Sports

ELLAKTOR Group actively supports actions that promote the values of sports and stands by our athletes, who compete and overcome themselves every day.



Volunteer work

The Group makes Donations - Sponsorships that relate to voluntary actions, which promote the concept of volunteering to its employees, as an important part of its overall Social Responsibility strategy.



SDGs

As the Group's priority is to achieve the 2030 Sustainable Development Goals (SDGs), the Group makes Donations-Sponsorships which are not included in the above categories, but contribute to the achievement of the Global Goals.

Although this strategy is the main guide for the society support, ELLAKTOR Group responds immediately to both emergencies (e.g., COVID-19 pandemic) and natural disasters (e.g., fires, floods, etc.), above and beyond the established strategy.

Strengthening public health structures during the COVID-19 pandemic

ELLAKTOR Group, through the companies STERILISATION S.A, APOTEFROTIRAS S.A. and J/V HELECTOR – ARSI S.A. (LEASING SERVICES FOR INCINERATOR SERVICES), contributed 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 managed by the Group’s Environment Segment since the beginning of the pandemic amounted to more than 110 tons (63,050.00 tons for 2021), with a total cost of €176,392.93.

In 2021, ATTIKES DIADROMES and ATTIKI ODOS supported the needs of the Athens General Hospital of Thoracic Diseases “SOTIRIA” by supplying necessary medical equipment, and the “Attikon” University General Hospital, to which a donation was made for the supply of additional hospital equipment for the fight against the spread of COVID-19. the total donations amounted to €20,700.

Wildfires

ELLAKTOR Group, through its subsidiaries, responded immediately to the emergency needs created by the summer wildfires of 2021, providing project machinery and manpower, while supporting both the firefighting and restoration efforts for the affected areas, supporting the work of the fire department and Civil Protection.

Initiatives Supporting Society

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. 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, emphasising on the sharing of know-how and expertise.

Some of the programs and initiatives implemented by the Group’s companies in 2021 are indicated below.

ELLAKTOR Group and the Bodossaki Foundation joined forces for implementing the programme “Experience Science”, an initiative for the creation and equipping of Chemistry, Physics and Biology science labs. ELLAKTOR Group’s donation enables the creation of science laboratories in twelve (12) selected public lower secondary schools throughout the country, located in the areas of its operation, ensuring the appropriate conditions for the students’ effective contact with these sciences.

The Bodossaki Foundation took the initiative to design and implement, with the donation of the ELLAKTOR Group, of a program for the creation and equipment of science laboratories for Chemistry, Physics and Biology in public lower secondary schools in Greece, in collaboration with the Panhellenic Association of Heads of Natural Science Centres (PANEKFE), a competent body of the Ministry of Education responsible for promoting actions, aimed at integrating experimental practice in the teaching of science in primary and secondary education.

The laboratories that will be supported through the Program have been selected in cooperation with the PAN.E.K.F.E. and ELLAKTOR Group and are the following:

- 1. EKFE of Alexandroupolis - 6th lower secondary School of Alexandroupolis
- 2. EKFE of Argolida - N. Kios lower secondary School
- 3. EKFE of Arkadia - lower secondary School of Vytina
- 4. EKFE of Arkadia - 3rd lower secondary School of Tripolis
- 5. EKFE of Viotia - Asopia lower secondary School
- 6. EKFE of Viotia - Domvraina lower secondary School
- 7. EKFE of Evia - Mantoudi High School
- 8. EKFE Evia - 3rd lower secondary School of Chalkida
- 9. EKFE of Zakynthos - Volimon lower secondary School

- 10. EKFE of Kozani - Galatini lower secondary School
- 11. EKFE of Laconia - Neapolis lower secondary School
- 12. EKFE of Lesvos - Petra lower secondary School

In addition, repsonding to a request received from the Ophthalmology Department of the Hospital of Penteli Children’s General Hospital, ELLAKTOR Group proceed-ed with the donation of an optotype projection screen (a screen that projects letters, numbers and shapes for visual acuity). This new monitor contributes significantly to the Hospital’s goal of renewing the ophthalmological equipment, in order to facilitate the performance of the ophthalmological examination of the Hospital’s young patients.

For ELLAKTOR Group, strengthening local communities, supporting the new generation and rewarding excellence, are areas of high priority and are at the heart of the Group’s values. The “ExcellenSeas” program is an initiative that aims to fund and guide excellent students from our border islands to academic and professional level. Through this program, ELLAKTOR Group has the opportunity to support a student from the island of Fourni for the next 5 years, highlighting these values in practice.

Lastly, ELLAKTOR Group supported the events of “PRESPEs 2021”, the institution of “PRESPEs”, an institution that mainly aims to promote Greek Culture and Art, the rich cultural heritage of the Prespes region, to strengthen friendly relations between the peoples and in maintaining peaceful coexistence.

Concessions Segment

The actions and programs 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. In 2021, “Attiki Odos S.A.” and “Attikes Diadromes S.A.” support-ed the implementation of **five (5) educational programs** that convey the message of Road Safety to children and teenagers:

- 1. **The e-Learning program “Open eyes on the road”** for students of the 2nd and 3rd grade of Middle School and all classes of High School, has received the approval of the Ministry of Education and Religious

Affairs and the Institute of Educational Policy (IEP). This is the progression of the interactive seminar with the same title, created by “Attiki Odos S.A.” and “Attikes Diadromes S.A.” in order to meet the challenges of the digital era. The aim is to approach students and teachers and raise their awareness of the important issue of Road Safety in a modern and effective way all over Greece, and especially in the most remote islands and villages. In 2021, **more than 4,200 students in the country** gained access to the Attiki Odos online program.

- 2. **The interactive exhibit entitled “I Drive and Walk Safely”**, which runs through the ground floor of the **Children’s Museum of Athens**, was designed by an interdisciplinary working group with the participation of pedagogues and museologists from the Hellenic Children’s Museum and traffic experts from the companies “Attiki Odos S.A.” and “Attikes Diadromes S.A.”, and was implemented after a six-month study with the aim of promoting traffic education in children aged 3 to 12 years old. In this particular venue, through play, creation, collaboration and active participation, children interact with each other, but also with Museum’s performers and the adults who play with them, discover how to behave on the street, at cross-ings and traffic lights, and how to recognise the traffic signs around them. In 2021, the Children’s Museum of Athens remained closed until 4th June due to the extraordinary conditions created by the COVID-19 pandemic and opened to the public on 5th June with limited opening hours and with registration for partici-pation in specific time zones. During this period, **1,453 children and 1,032 adults** visited the “Driving and Walking Safely” exhibit.
- 3. **The experiential educational performance “Attikoulis”** was presented for the first time in 2006, while its 6th script revision renewal was completed in 2020. It is a two-hour theatrical game that aims to bring Kinder-garten and Primary School children in contact with the basic principles of Road Safety in a creative and interactive way. By the end of 2019, **62,000 children** had attended the show, but in 2021, as in the previous year, the revamped show entitled “Attikoulis & the Kingdom of Atzamosini” **was temporarily withdrawn from schools and municipalities** due to the extraor-dinary conditions created by the COVID-19 pandemic.

4. The music and dance performance “The Asphalt Trobadours” with the popular youth band Burger Project is a new initiative from Attiki Odos which is addressed to children of Kindergarten and Primary School. During the show, children become familiar with the basic rules of the Traffic Code, the correct conduct of pedestrians, cyclists and skaters, while learning about the importance of the safety belt, the helmet and the appropriate driving equipment. The new educational show was completed in 2021, but it was temporarily withdrawn from schools and municipalities due to the extraordinary conditions created by the COVID-19 pandemic.

5. The educational program “In Traffic with Safety”, which has been implemented for more than a decade in classrooms and other areas by specially trained educators, in collaboration with the Road Safety Institute “Panos Mylonas”, is approved by the Ministry of Education and Religious Affairs and the Institute of Educational Policy (I.E.P.). In 2021, the experiential traffic education program continued to be implemented in Kindergartens, Primary Schools and summer camps, with restrictions, due to the exceptional conditions created by the COVID-19 pandemic, with over 2,000 children participating in it. In total, over 76,400 children have attended over the years.

Actions carried out by the companies by the companies “Attikes Diadromes” and “Attiki Odos” are listed below, for information and awareness in matters of road safety and safe driving.

- In 2021, ATTIKI ODOS created **four (4) videos** starring the safe driving instructor Thanasis Chountis, which have been posted on its YouTube channel, conveying information on safe driving in a different way. They cover important issues for every driver, in particular, distractive driving, the consequences of fatigue while driving, and advice for cyclists on the appropriate equipment and protection in case of rain.
- In 2021, Attiki Odos supported for the second time the efforts of the IMRUA (International Fire & EMS Motorcycle Response Unit Association) Hellas **rapid response motorcyclists’ team**, covering their training needs in safe driving through a specialised program under the guidance of the expert Thanasis Choudras. Specifically, in October, twenty (20) riders/responders continued their training to the next stage, while two (2) more people who recently joined the force also completed their training.

- In 2021, Attiki Odos carried out an extensive **advertising campaign through banners on news websites**, aiming to further promote and advertise the educational programs it implements to promote road safety culture among children and teenagers.

In addition to road safety actions, in 2021 the companies “Attiki Odos” and “Attikes Diadromes” made donations totalling more than €42,000 to NGOs and other organisations. Some examples are the Association “Diazoma”, the Municipality of Paiania (coating the courtyard with anti-slip surface at the 3rd Primary School of Painia, with a view to ensuring the children’s safety and allowing them to enjoy creative activities), the Hellenic Animal Welfare Society (Filozoiki) , the Speech, Writing and Communication. Rehabilitation Centre “Dynamai”, the Association of Lofos Kyrillou, the Centre of Special Education for Children and Adults with special needs “Horizons”, the Association of Parents, Guardians and Friends of people with Intellectual Disability “To Ergastiri”, the Association of Parents, Guardians and Friends of Autistic Children “S.O.S.”, the “Gefira Zois”, the Scientific Association for Adapted Activities “Victor Artant - NIKI”, the Christian Home for Girls “Agia Anna”, the General Charity Fund of the Holy Metropolis of Gortynos and Megalopolis, the Association for the Protection and Care of Wildlife “ANIMA”, the “Ark of the World”, “Forest Wide” and the Normative National Nursing Home in Kallithea.

In addition, the companies provided a total of seven (7) PCs and one (1) printer for the needs of the 2nd Primary School of Peristeri, the 3rd Primary School of Kifissia and the Holy Metropolis of Veroia, Naoussa and Kampania (Church of Agios Georgios Naousis). They also responded to the request of the Municipality of Spata - Artemis for the provision of safety barriers, while this year they supported the annual event of the Hellenic Institute of Transport Engineers, providing an e-PASS transponder with credit for the lottery that took place during the ceremony.

With the aim of stimulating the local economy impacted by the pandemic, in 2021, MOREAS supported the 27th International Dance Festival of Kalamata, which was organised in compliance with the necessary measures for the protection of public health.

Renewable Energy Sources Segment

Initiatives supported by the companies in the Renewable Energy Sources segment in 2021, 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, the Group, among other actions, undertook the cost of counting the water meters of the Municipality, the cost of construction and installation of 110 metres of railings in the local community of Reicheas and covered the cost of environmental works in the beach of Vlychada. It also provided the necessary equipment and undertook the expenditure for the maintenance of the road of the settlement of the local community of Koupia and other rural roads around it.

- In the Municipality of Tripoli, the Group provided project machinery for the opening and cleaning of a stream in the local community of Saga.

- In the Municipality of Argos-Mykines, the Group covered the cost of carrying out works to improve the passability of a rural road in the local community of Achladokampos.

- In the Municipality of Voio Kozani, the Group undertook the cost of carrying out works for the improvement of rural roads in the local community of Eratyras.

- In the Regional Unit of Ioannina, the Group undertook the cost of paving local roads in the Municipality of Zitsa & the Municipality of Pogoni.

In addition, funds were donated to support the work of many local organisations and cultural associations, such as: the Pistamata Association of Laconia, the Ierakiotes Association of Laconia, the Association of the Charakiotes of Laconia, the Cultural Association of Prosvoros of Grevena and strengthened the logistical equipment of the Police Department of Messolonghi.

It should also be noted that in 2021, 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 €3,097,513, 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 €1,755,258).
- Approximately 10% is attributed to the Green Fund (approximately €309,751).

- Approximately 33% of this amount is allocated to residential consumers of the local community, where each project is located, through the electricity supplier (approximately €1,032,504).

Lastly, regarding the small hydroelectric station at Smixiotiko, in addition to the above attributions, approximately 1% was also attributed to the sales of the station’s electricity (before VAT) in favour of the management body (total €10,864).

Environment Segment

The actions and programs 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 2021:

- The Group’s companies active in the management of waste from landfills, APOTEFROTIRAS, STERILISATION and HELECTOR S.A. - ARSI S.A. JOINT VENTURE provided free medical waste management services to NIMITS hospital, which amounted to more than 63 tonnes for 2021, thus contributing to the efforts of public health structures againsts the COVID-19 pandemic.

- The company EDADYM S.A. supported the action “Cycling to a car-free day” for the European Mobility Week in the Municipality of Eordea, by sponsoring 7 electric scooters. A temporary-symbolic stoppage of car traffic on central roads in the city of Ptolemaida was carried out and the actions that took place contributed to the development of environmental ethics and the promotion of sustainable modes of movement and transport.

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 2021, 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:

- Provision of timber from tree cutting, during the cleaning of a canal in the area of Metamorphosis, to families in need of the community of Alonaki in Kozani.
- Providing support (temporary placement of signs and cones) during the race - Tour of Lake Ioannina.
- Safety Drill at the Votonosiou Tunnel, at the request of the Fire Services Administration of the Prefecture of Ioannina.
- Donation of equipment to the Traffic Police of Veria.

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 Group's companies prioritise hiring staff from the local communities in which they operate. Indicatively, it is stated that more than 75% of the employees in the Concessions segment, 79% of the employees in the RES segment, 62% of the employees in the Environment segment, 52% of the employees in the Construction segment, as well as 100% of the employees in the Real Estate segment, come from local communities.

The organizations which the Group's companies supported in 2021 include the non-governmental organisation "Make-A-Wish Greece", which ELLAKTOR Group has been supporting since 2016, the "SOS Children's Villages of Greece", the Social Grocery Store of the Municipality of Elliniko-Argyroupoli, etc.

Employee Volunteering

The Group's employees actively participate in voluntary social solidarity events held annually. However, voluntary actions carried out in 2021 were limited due to the COVID-19 pandemic.

The second workshop for the action took place on Tuesday 23.11.2021, where the volunteers presented, with great enthusiasm, goodwill and zeal the scenarios for the wish fulfillment that they had prepared, in order to be used as creative ideas for the wishes.

It is worth noting that employees from all over Greece participated in the voluntary action; they were able to log in via an online platform and participate in all stages of the action.

The Group's employees embraced this action and responded with enthusiasm and creativity, offering their time and contributing with their skills to its success. The dynamic participation of ELLAKTOR Group's volunteers proved once again how such a generous cause on the one hand, can bring a smile and hope to the eyes of our fellow human beings and on the other hand it confirms the power of the cooperation when many people act together.

In addition to the above action, which was organised for the first time and with great success, every year ELLAKTOR Group hosts at its Headquarters the Christmas and Easter Bazaar of the organisation "Make-A-Wish Greece", supporting the Organisation in order to offer Joy, Strength and Hope to even more children in need. Due to the restrictions imposed for the pandemic, in 2021 only the Christmas Bazaar was held, raising a total of €2,990.60.

As far as voluntary blood donation is concerned, the companies ATTIKI ODOS and ATTIKES DIADROMES have been operating a Blood Bank since 2004, to which all employees and their relatives have access, should the need arise. It is worth noting that participation in the blood donation program is very high every year.

A blood donors' association has been created at HELECTOR in the Mechanical Recycling and Composting Plant. In collaboration with the Evangelismos Hospital, blood donation is carried out twice a year through the hospital's mobile unit, which visits the factory site.

All Group companies that implement voluntary blood donation activities offer to blood one day of additional leave for each participation in a voluntary blood donation event, as a reward.

Blood Donation Data of Group Companies for 2021

Blood donors	299
Blood donations	20
Blood Units	463
Blood Units used by Group employees	170

GRANT-A-WISH



In 2021, as part of its Corporate Social Responsibility program, ELLAKTOR Group implemented the voluntary action **Grant-A-Wish** at the Group's headquarters in collaboration with the non-governmental organisation Make-A-Wish Greece, adopting for the first time, 6 children's wishes, which were pending for their fulfillment.

Make-A-Wish Greece grants wishes of children aged 3-18 years, who suffer from critical illness, strengthening their struggle for life, with joy, hope and strength. Research shows that children whose wish has been granted can regain the physical and emotional strength they need to cope with a very serious illness. Make-A-Wish Greece has been operating in Greece

since 1996 and is a member of the World Organisation Make-A-Wish.

The Grant-A-Wish volunteer action is a unique and original action, which involves the employees of the supporting companies in all stages of wish fulfillment from planning and organisation to its implementation, under the guidance and coordination of Make-A-Wish representatives.

On Friday 19.11.21, the first workshop of the volunteers took place. During the first phase of the action, under the coordination of the representatives of the organization, the way of planning the wishes was presented, groups were created for each wish, a coordinator was appointed, instructions and information about the action, the specificities and needs for the wishes of each child were given and studied.





GOVERNANCE



New Board of Directors



Adoption of a Conflict of Interest Policy



Adoption of a Code of Conduct for Business Partners



Implementation and certification of ISO 37301:2021
(Regulatory Compliance Management System)
in the Group



CORPORATE GOVERNANCE

The demanding and constantly changing environment in which ELLAKTOR Group operates dictates an effective Corporate Governance framework that responds to the challenges of the times and adapts to business, economic and social conditions, recognising risks and opportunities.

ELLAKTOR applies the principles of corporate governance, as defined by the relevant legislative framework, and has adopted, by the decision of its Board of Directors dated 28.06.2021, the Greek Corporate Governance Code of the Hellenic Corporate Governance Council (June 2021), which is inspired by the Corporate Governance Principles of the Organisation for Economic Cooperation and Development (OECD).

The Board of Directors of ELLAKTOR attaches particular importance to Corporate Governance issues, aiming at the adoption and operation of systems and processes that optimise the Corporate Governance System (CGS). The CGS incorporates a strong Internal Control System (ICS) that shields the Group and aims to achieve its strategic objectives, while ensuring its integrity and enhancing its competitiveness through flexible structures and innovative approaches.

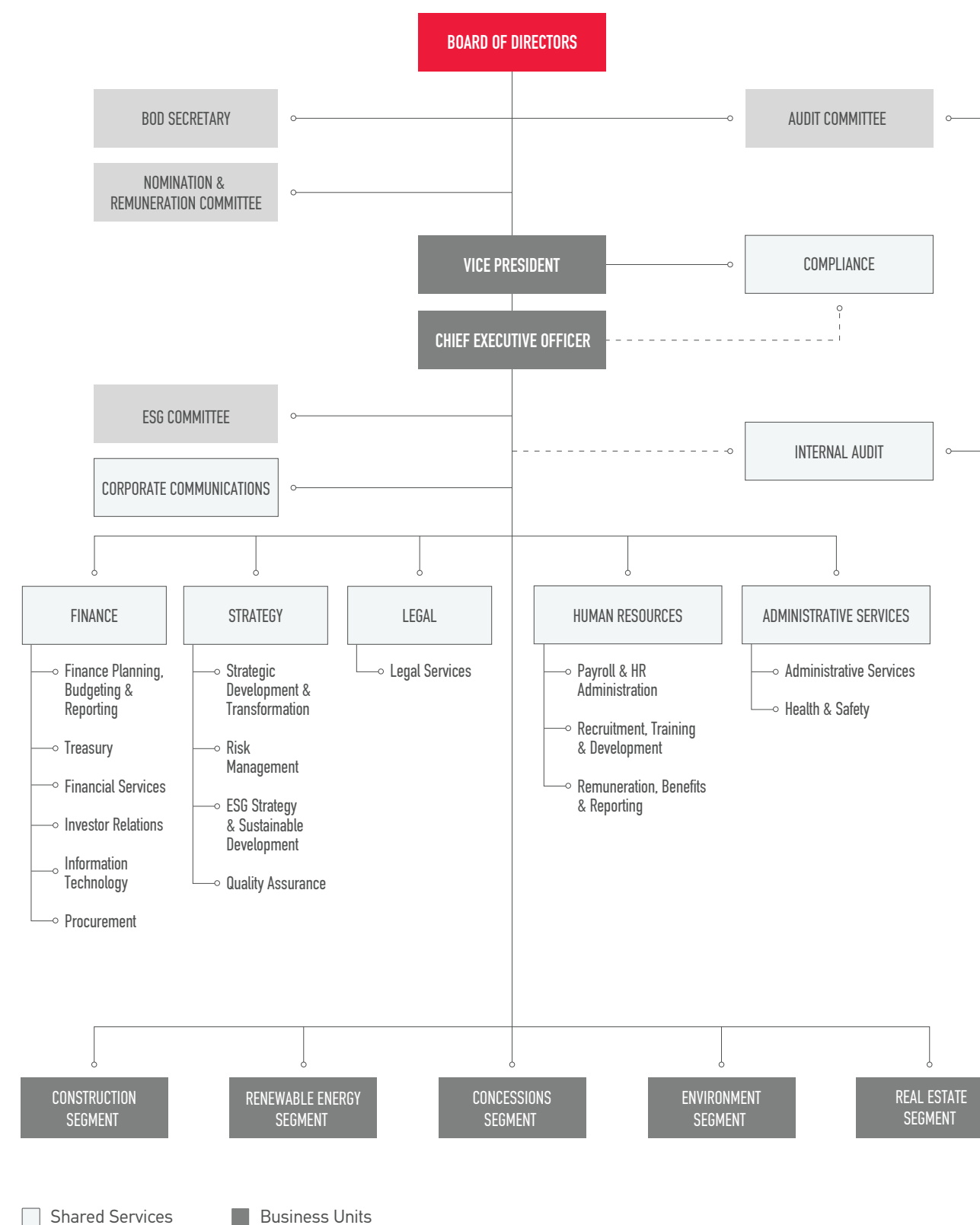
In this context, the Group has adopted a series of Policies, including the Board Member Suitability Policy and the Board Member Remuneration Policy, which are specified in procedures and forms for their practical implementation.

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 Company's Board of Directors has established Committees with supervisory, authorisation, coordination and advisory competences, comprised of its members and Top Management executives, in order to assist the 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



Corporate Governance Code

For the period from 1 January 2021 to 28 June 2021, ELLAKTOR applied the principles of corporate governance as defined by the relevant legislative framework (Law 3016/2002, Law 4449/2017 Article 44 and Law 4548/2018 Articles 150, 151, 152 and 153). These principles of corporate governance for the aforementioned period were incorporated in the Corporate Governance Code (based on the Hellenic Federation of Enterprises Corporate Governance Code, January 2011) which was posted on the **Company's website** under the **"Corporate Governance sub-section"**.

By the decision of its Board of Directors dated 28.06.2021, the Company, in compliance with the current legislative framework and in accordance with the specific provisions of article 17 of Law 4706/2020 and article 4 of Decision 2/905/03.03.2021 of the Board of Directors of the Hellenic Capital Market Commission, has adopted the Greek Corporate Governance Code of the Hellenic Corporate Governance Council (June 2021), which is posted on the Company's website, specifically at the link **"Corporate Governance Code 2021"**.

The Corporate Governance Code guarantees the duration and effectiveness of the Group's operation, while 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. The deviations from the Special Practices of the Greek Corporate Governance Code are detailed in **ELLAKTOR's 2021 Annual Report** (Section B.3 Corporate Governance Statement).

Board of Directors

The Company's Board of Directors, the members of which are elected by the General Meeting, is entrusted with the overall management and administration of corporate affairs in accordance with the Law and the Company's Articles of Association, including representation of the Company and making decisions on all matters concerning the Company affairs, apart from those matters for which the General Meeting of Shareholders has exclusive competence, with the aim of protecting the interests of the Company and its shareholders. Being the Company's supreme administrative body, it crafts its strategy and supervises and controls the management of its assets.

The Company's Board of Directors at the close of fiscal year 2021 arose from:

- the Extraordinary General Meeting of the Company's Shareholders held on 27.01.2021 (postponement of the meeting originally planned to be held on 07.01.2021), in the context of which the Body of Shareholders elected Mr. George Mylonogiannis, Mr. Aristides Xenofos, Mr. Dimitrios Kondylis, Ms Athena Chadjipetrou, Independent Non-Executive Member and Mr. Konstantinos Toumpouros, Independent Non-Executive Member, as constituted at the same date,

- the Board of Directors' decision of 21.05.2021 on its reconstitution into Body following the election of Mr. Efthymios Bouloutas in replacement of the resignee Mr. Dimitrios Kondylis, and

- the decision of the Ordinary General Meeting of the Company's Shareholders dated 22.06.2021, which elected two additional new members, namely Ms Ioanna Dretta and Ms Evgenia Leivadarou (Independent Non-Executive member), as this was further reconstituted into Body, in accordance with the Table below, during its meeting on the same date.

The term of office of the members is five years formally expiring on 27 January 2026, commencing from the date of their election and ending with the election of new members of the Board of Directors by the General Meeting of Shareholders held in the year of termination of their term of office, and not extendable beyond six (6) years, as determined in Article 7 (2) of the Company's Articles of Association and Article 85 of Law 4548/2018 as applicable.

The composition of the Board of Directors of the Company as at 31.12.2021 is set out in the table below:

Full Name	Location	Capacity
George Mylonogiannis	Chairman	Non-executive member
Aristides (Aris) Xenofos	Vice-President	Non-executive member
Efthymios Bouloutas	CEO	Executive member
Konstantinos Toumpouros	Director	Independent non-executive member
Athena Chadjipetrou	Director	Independent non-executive member
Ioanna Dretta	Director	Non-executive member
Eugenia (Jenny) Leivadarou	Director	Independent non-executive member

The aforementioned Board of Directors consisted of seven (7) Greek nationals, four (4) men and three (3) women, three (3) aged 30-50 years and four (4) over 50 years. 43% of the Board members are independent, 86% of the Board members are non-executive, and 43% of the Board members are women. In addition, the role of Chairman and CEO are not held by the same person.

It is underlined that an Extraordinary General Meeting of the Company's Shareholders took place on 30.06.2022,

in the context of which the Shareholders elected Mr. Panagiotis Kyriakopoulos, Mr. Georgios Triantafyllou and Mr. Georgios Prousanidis as additional members of the Board of Directors of the Company, and reappointed the Member Ms Ioanna Dretta, from non-executive member to independent non-executive Member of the Board of Directors for the remainder of her term of office.

Accordingly, the composition of the Board of Directors of the Company as at the date of issue of this document, July 2022, is set out in the table below:

Full Name	Location	Capacity
George Mylonogiannis	Chairman	Non-executive member
Aristides (Aris) Xenofos	Vice-President	Non-executive member
Efthymios Bouloutas	CEO	Executive member
Konstantinos Toumpouros	Director	Independent non-executive member
Athena Chadjipetrou	Director	Independent non-executive member
Ioanna Dretta	Director	Independent non-executive member
Eugenia (Jenny) Leivadarou	Director	Independent non-executive member
Panagiotis Kyriakopoulos	Director	Non-executive member
Georgios Triantafyllou	Director	Non-executive member
Georgios Prousanides	Director	Non-executive member

More information on Corporate Governance, the Board of Directors and its Committees is provided in the

Corporate Governance section of the **Group's website** and in the **2021 Annual Report**.

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 Ethics. The Regulatory Compliance function, which is responsible for the design and implementation of the Regulatory Compliance Management System, reports, through the Vice Chairman, to the Group's Board of Directors, a fact that constitutes a clear commitment to integrity and transparency.

ELLAKTOR Group operates a Compliance Management System that has been certified by an independent body in accordance with the new ISO 37301:2021 Compliance Management System that replaced ISO 19600:2014 and incorporates:

- an Anti-Bribery Management System, which is certified in accordance with ISO 37001:2016 at least for the main subsidiaries in all sectors. In particular, in 2021, the Anti-Bribery Management System applied by AKTOR, TOMI and REDS was certified by an independent certification body in accordance with ISO 37001:2016. It is highlighted that HELECTOR applies an Anti-Bribery Management System, certified since 2017 in accordance with ISO 37001:2016, while the relevant system of ELLAKTOR and AKTOR CONCESSIONS has been certified since 2020.
- a Whistleblowing Management System, which follows the guidelines of ISO 37002:2021, for which it has received certification from an independent certification body in 2022.

Integrity Regulatory Compliance Program

In order to successfully implement the Compliance Management System, ELLAKTOR has developed an Integrity Regulatory Compliance Program which includes Integrity Compliance Measures that are incorporated in its daily work to ensure compliance with all applicable laws and regulations and to assure that the right decisions are made on a daily basis.

The Integrity Regulatory Compliance Program encompasses all the necessary tools and resources to promote a culture of integrity and follows the "Commit - Assess - Act - Monitor: Constantly Improve" approach.

In order to make it possible to report incidents of violations of the Code, policies, regulations and applicable legislation, the company has established multiple communication channels (phone, e-mail, complaint platform, etc.) which have been renamed to **Talk2Ellaktor** as of October 2021. In addition, the new reporting and complaints platform (anonymous complaints can also be submitted) was launched in early 2022, in full compliance with the European Directive 1937/2019.

Codes & Policies

Policies and Codes are in place at the Company and Group level for the implementation of the Regulatory Compliance Management System, which include the principles and rules applicable to the Group. These Policies and Codes form an integral part of the Company's and the Group's Internal Control System, which includes a number of additional policies and procedures - in addition to the Regulatory Compliance Management System - the most important of which are listed below:

- Code of Ethics
- Code of Conduct for Business Partners
- Anti-Corruption Policy
- Conflict of Interest Policy
- Reporting & Complaints Policy

Please note that the Code of Ethics and the Code of Ethics for Business Partners are available in 4 languages - Greek, English, Romanian and Arabic - in accordance with the strategic planning of the Group, and are accompanied by the respective policies and procedures.

The **Code of Ethics**, consisting of a set of fundamental principles and rules that shape the way we act and behave in everything we do, establishes standards of ethics, obligations and commitments on how we work, how we interact with each other, how we all work together as good corporate citizens and how we build and maintain trust.

The **Code of Conduct** for Business Partners explains what ELLAKTOR expects from its business partners in terms of business ethics, human rights, employee relations, health and safety, and other issues related to sustainable and accountable business practices.

Anti-Bribery Policy

With the aim of strengthening integrity, transparency and zero tolerance in corruption issues, the Group and its subsidiaries have adopted an Anti-Bribery Policy and a Reporting and Complaints Management Policy since the beginning of 2020, which seeks to reinforce the commitment of the Group's Management to zero tolerance of bribery by creating a framework of obligations and guidelines that can 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/ subcontractors and persons providing services to Group companies and (iv) any third party acting on behalf of the Group.

In 2021, there were no cases that reached Courts against the Group or its employees in relation to corruption and anti-competitive behavior.

Conflict of Interest Policy

The Conflict of Interest Policy aims to comply with: **a)** the applicable legislative and regulatory framework governing conflict of interest situations, and **b)** the Group's internal policies and procedures. It defines conflicts of interest and the categories thereof, it is designed to encourage confidential reporting of any incident or reasonable suspicions, through the available communication channels established by the Group, and promotes awareness and vigilance of employees and business partners with regard to the identification of actions related to conflicts of interest.

Reporting & Complaints Policy

In order to provide the possibility of reporting any incidents of violation of the Code of Ethics, the Policies and the applicable legislation, the Company has adopted the Reporting and Complaints Management Policy, which sets out the principles and operating framework in accordance with which the Group receives, processes and investigates named and anonymous reports/complaints of irregularities, omissions or other criminal acts brought to the attention of its staff, customers or suppliers or other third parties. The Policy applies to all Group companies.

Talk2Ellaktor offers multiple channels for expressing concerns and/or incident reporting in a secure and easy-to-use manner.

Reports can be submitted confidentially or completely anonymously. All reports are treated confidentially, without fear of retaliation against anyone who expresses any concern or reports any potentially problematic incident in good faith.

In 2021, there were no confirmed incidents of corruption and the Group did not terminate the cooperation with employees or partners due to such issues.

A more detailed description of the Integrity Regulatory Compliance Program, as well as the above policies and procedures, is available on the Group's website.

Training

Group employees regularly attend training and seminars on compliance and integrity issues.

In 2021, an Integrity Training was implemented with a distinct training on the new Code of Ethics and the new Integrity Regulatory Compliance Program, for the all Members of the Boards of Directors of the Group's Companies, the Company's executives as well as selected executives of the Group's main subsidiaries in Greece and abroad, based on their position and responsibilities.

In addition, training on the new Compliance documents and the Regulatory Compliance Program for Integrity was provided to the Compliance Officers of the Group's business segments and Compliance Liaisons.

During 2021, the Group's Head of Compliance and the Compliance Officers of the Segments attended specialised seminars and presentations on Compliance and Corporate Governance issues, such as the annual conference organised by ACFE Greece, entitled "How to Cure Procurement Fraud", the conference of Transparency International Greece entitled "Integrity Pact: Protection Instrument for Co-financed Projects", the information event for the research of the Hellenic Federation of Enterprises-KPMG-Union of Listed Companies-Hellenic Corporate Governance Council on "Final straight before the implementation of the new Corporate Governance Law", and "Risk & Compliance in 2021: How to Benchmark Your Program to Cultivate Success" by Navex Global.

In addition, the Group's Head of Compliance attended conferences on Compliance and Ethical Business Practices, such as the three-day international conference of the "32nd Annual ACFE Global Fraud Conference", the "4th Compliance Conference / Building the Compliance Function of the new era" organised by the Association of Greek Certified Compliance Officers, and the "2nd Compliance Conference of KPMG".

Finally, following ELLAKTOR's participation, since 2021, as a corporate member of:

- the Business Integrity Forum of International Transparency Greece and the
- ACFE Corporate Alliance of the Association of Certified Fraud Examiners,

all Compliance Officers of the Segments participated in 2 Round Tables exclusively for BIF members in Greece and the Group's Head of Compliance took part in one online meeting exclusively for ACFE Corporate Alliance members with participants from all over the world.

Personal Data Protection

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

In 2021, where required, policies and procedures relating to the deepening and strengthening of the protection framework, in accordance with the General Data Protection Regulation, were reviewed in conjunction with developments in national legislation.

The Processing Activities File and the Data Protection Policy include all the principles that must govern any processing of personal data carried out by the Group and the relevant obligations, the rights of the data subjects, as well as the required security measures. The Procedure for the Exercise of the Data Subjects' Rights and the Data Retention and Destruction Procedure have been included as annexes to the Protection Policy.

In addition to the actions related to compliance with the General Data Protection Regulation, individual data protection issues that arose during the normal operation of the Group were addressed. Moreover, five requests to ATTIKES DIADROMES were processed, which concerned the deletion of the applicants' data due to the cancellation of their accounts, one request for access to the applicant's personal data, one request for access to the personal data of an employee who served the applicant (rejected as the legal requirements were not met) and one complaint about an alleged leak of personal data, which was rejected as unsubstantiated. All requests were dealt with within the legal deadline and there was no follow-up from the applicants.

There were no incidents of personal data breach relating to the Group's customers or non-compliance with the General Data Protection Regulation.

RISK MANAGEMENT AND BUSINESS CONTINUITY

The Company's Board of Directors places particular emphasis on the internal audit and risk management systems for which it is responsible, with the aim of adopting and operating systems and processes to ensure optimal risk management, especially in relation to the process of preparing financial statements.

The scope, size and complexity of the Group's activities demands a composite system to approach and address risk management. Risk prevention and management is an important factor in Group strategy formation.

Risk management includes all strategies, methods and procedures for identifying, analysing, evaluating, controlling and reporting the short- and long-term risks that the Group faces, or is likely to face in the future. Risk management is an integrated and continuous process intended to ensure the effective management of Company risks, including strategic, financial, and operating risks, technical risks, market risk, as well as those risks related to compliance and the reputation of the Group, with the aim of minimising unexpected derogations from Company objectives and increasing the Company's actual value.

The Board of Directors utilises the internal audit system in order to protect the assets of the Company, to assess risks emerging from its operations as a whole, and to provide accurate and complete information to shareholders about the actual position and prospects of the Company, as well as to determine how to address the risks identified.

Management is responsible for the systematic identification and assessment of risks affecting business activities. Furthermore, it 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 the best possible management scenarios.

The Group companies have developed ISO management systems, which introduce the "risk-based thinking" approach, identifying potential threats and opportunities related to their activities and taking them into account when designing their Management Systems. The threats identified are categorised according to the risk of their occurrence and threat management procedures are developed according to the specific requirements of the projects/customers. 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.

In addition, as part of the Integrity Regulatory Compliance Program, ELLAKTOR has developed a methodology for the identification, assessment and management of integrity risks, which are broken down into individual risks (bribery, compliance, etc.), identified by taking into account various factors (e.g., environment, operations, activities, etc.) and assessed based on their likelihood and impact. This process is ongoing across the Group and ensures that ELLAKTOR focuses on high-risk areas as a priority.

With regard to the working environment, the Group recognises the existence of risks due to the lack of equal opportunities for advancement and the lack of attractive remuneration and benefits, which may lead to the loss of experienced and qualified employees or to a reduction in their performance. The Group's objective is to mitigate the aforementioned risks through due diligence policies and procedures aiming to the retention and attraction of competent employees and executives, through a uniform remuneration and benefits system, which ensures legal and competitive (in respect to the labour market in each country in which the Group operates) remuneration, offering in many cases compensation and benefits beyond those set by law.

In the context of Health & Safety of its employees, the Group also recognises a number of risks, such as possible injuries at work, possible occupational diseases, emergencies (COVID-19 pandemic, fire, earthquake, flood, chemical gas leakage, etc.), non-compliance with legal and other requirements, failure to identify the occupational risk (unsafe way of performing work, lack of training, failure to apply the 15 inviolable H&S rules, etc.), unsatisfactory provision of services by third parties (external partners, suppliers, subcontractors, etc.) on health and safety issues, complaints from employees or external partners of the Group, possible sanctions or defamation that may arise, exclusion of the Group from pre-selection questionnaires in public or private sector projects due to poor performance (statistical indicators in H&S of work). In order to manage and minimise the aforementioned risks, the Group has adopted a series of measures which are presented in detail in the chapter **SOCIETY**.

Lastly, the Group recognises the main risks and threats to environmental management.

Some examples are:

- non-compliance with environmental legislation,
- non-compliance with the environmental authorisation of the project,
- pollution incidents at sea or in a receiving water body,
- fire hazards,
- uncontrolled dust emissions,
- uncontrolled gas emissions,
- waste spills,
- soil pollution,
- inefficient use of energy resources,
- increased water consumption,
- noise and vibrations above the limits,
- complaints from stakeholders/other complaints/ fines,

- environmental impacts from subcontractor operations and risks related to ensuring business continuity and preparedness for emergency situations (e.g., pandemic).

In order to limit the environmental impact of its activities and mitigate the environmental risks, the Group has adopted a series of measures which are presented in detail in the chapter **ENVIRONMENT**.

Certified Management Systems

In order to ensure transparency in all its activities and greater efficiency of its business operations, ELLAKTOR Group has developed procedures and Management Systems, which are certified in accordance with 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** for **Quality Management Systems**
- **ISO 45001** for **Occupational Health and Safety Management Systems**
- **ISO 14001** and **EMAS** for **Environmental Management Systems**
- **ISO 50001** for **Energy Management Systems**
- **ISO 39001** for **Road Safety Management Systems**
- **ISO 37001** for **Anti-Bribery Management Systems**
- **ISO 37301** for **Regulatory Compliance Management Systems**
- **ISO 27001** for **Information Security Management Systems**
- **ISO 22301** for **Business Continuity Management Systems**

List of Certified Management Systems



Company

**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.

INCINERATOR LEASE J/V
HELECTOR S.A. - ARSI S.A.

BEAL S.A.

CONSTRUCTION

AKTOR S.A.

AKTOR F.M. SINGLE MEMBER S.A.

HELLENIC QUARRIES S.A.

GREEK NURSERIES S.A.

TOMI S.A.

REAL ESTATE DEVELOPMENT

REDS REAL ESTATE
DEVELOPMENT S.A.

YIALOU EMPORIKI & TOURISTIKI
(Smart Park)

¹ AKTOR S.A., TOMI S.A. & REDS REAL ESTATE DEVELOPMENT S.A. were certified on 11/2021.

² The scope of the ISO of AKTOR is the Management of the Vehicle Fleet of the project "Operation and Maintenance of the Egnatia Highway and its Vertical Axes".

The Group was audited for all its activities with regard to the application of the guiding principles of the ISO 37301: 2021 standard on Regulatory Compliance Management, replacing ISO 19600:2014, while HELECTOR was audited for the application of the guiding principles of the ISO 26000 standard on Corporate Social Responsibility management.

In addition, ELLAKTOR Group holds a certification for the headquarters building in accordance with the requirements of the ELOT 1439:2013 standard, "Disability-friendly organisation" regarding accessible parking spaces, accessible entrance, accessible routing (horizontal and vertical), accessible services, accessible fixed equipment, accessible escape and staff education/training.

The Group aims to complete the creation and implementation of Integrated Management Systems (IMS) for all its companies, thus achieving its operation as a single unit with unified objectives.

Business Continuity

IT Systems

The Group uses an ISO27001-certified integrated Information Security Management System, intended to protect the confidentiality, integrity and availability of corporate information. The Information Security Management System, comprising policies, procedures and systems, manages the level of operating risk that results from the Group's reliance on information systems and ensures the highest level of accuracy of the financial data provided.

Individual policies and procedures ensure critical functions such as:

- User and Access Rights Management
- Password Management
- Backup and Restore
- Security Incident Management
- Remote Working
- Regular checks for vulnerabilities and intrusion tests
- Physical security of information infrastructure

- End user training

In addition to the Group's IT infrastructure, there are dedicated technical systems and security mechanisms in operation, such as:

- A new generation firewall
- An Intrusion Prevention System (IPS)
- An Internet access protection system
- A system for workstation protection against advanced malware
- An email security system
- An access control mechanism at network level
- A vulnerability tracking mechanism for information systems
- An event correlation and security incident tracking system

Technical security systems are monitored continuously (24x7) using a dedicated cybersecurity service, aiming to minimise the time needed to detect and respond to security incidents.

At the same time, 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 strategy is aligned with the Group's objectives and priorities,
- the Group's important operations are defined and categorised with respect to the prioritisation of the Group's business activities,
- the information resources that support the Group's critical functions are identified and the maximum recovery time and the required technical procedures are determined, as are (Disaster Recovery Plan).

- the risks faced by the aforementioned information resources and the business implications of the occurrence of the relevant threats are identified and used in the preparation of Business Continuity Plans.

Response to the COVID-19 pandemic

With the primary objective of protecting the Health and Safety of its employees, the Group continued to take all appropriate measures to ensure its uninterrupted operation, as well as the uninterrupted operation of its service users and its customers.

In 2021, the Group maintained existing practices implemented in 2020, but also took some additional new actions. These practices include:

- Drawing up emergency plans for a confirmed COVID -19 outbreak at construction sites and office buildings.
- Implementing a structured remote working program (Teleworking) in specific organisational units.
- Continuously and uninterruptedly supplying the facilities with the necessary personal protective equipment (FFP2 high respiratory protection masks, antiseptics, etc.).
- Performing frequent COVID-19 screening tests for Group employees.
- To the extent possible, providing each worker, with separate tools and work equipment.
- Putting in place arrangements to avoid physical contact and maintain a distance of at least 2 metres between employees and customers/visitors in all work areas including meal and rest areas and sanitary or cleaning facilities.
- Placing physical barriers (e.g., transparent or solid barriers) at designated points within workplaces if spacing is not feasible or if the nature and conditions of the work require it based on a risk assessment.
- Prohibiting any outside contractor, visitor or other employee from entering the workplace without showing proof of COVID-19 vaccination or proof of a certificate of infection.

Ensuring the operation of highways during the pandemic

In accordance with 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 highways. Transits on Attiki Odos decreased by 11% in 2021 compared to 2019, for the whole year, while compared to 2020 they increased by 16.83%. The companies ATTIKES DIADROMES and MOREAS have maintained in force operational plans and preventive measures to deal with the pandemic, which are updated whenever necessary, adapting to new data and changes in the legislative framework.

In 2021, depending on the evolution of the pandemic in the country, the imposition of State measures (lockdowns, bans and movement prevention) continued to have an adverse effect on traffic. Transits on the MOREAS Highway in 2021 were up 12.42% over 2020, but down 13.59% over 2019 (the last year before COVID-19).

During the year, the Operations and Maintenance work programme continued without delays, thanks to the continuously updated operational plans and the following preventive actions:

- Faithful implementation of the legislation and protocols of the National Public Health Organisation (NPHO).
- Monitoring and effective treatment of cases and possible cases in staff, tracing and isolation of close contacts and carrying out diagnostic tests where required.
- Disinfection of building and vehicle spaces and collaborations for testing in all areas of each project.
- Adaptation of procedures in all Operations & Maintenance Departments in order to minimise close contacts during the work.
- Successful implementation of scenarios to address possible staff shortages.

Handling Emergency Situations

In cases of emergency situations, and depending on the circumstances, the Group's competent Divisions

coordinate their actions in cooperation with executives of the subsidiaries. The Group's objective is to eliminate accidents, eliminate incidents/emergencies and ensure the continuity of the normal operation of the project/activity after each incident.

In the context of organising a safe working environment, Health and Safety Management Plans (H&S Management Plans) are drawn up before the commencement of work in each project / activity of the Group, in accordance with national legislation and international standards.

The following are part of the Group's Project/Activity HSMS:

- Written Occupational Hazard Assessment (WOHA),
- The Emergency Response Plan (ERP),
- The Emergency Response Team (ERT),
- Group Health and Safety Guidelines and Procedures (HSD, HSP).

The ERP part of the HSMS is designed by mapping all possible Emergency Hazards with their response instructions so as to achieve a smooth and immediate return to normal activity. The objective of the Emergency Response Plan is to define actions and responsibilities within a project/activity in order to facilitate as much as possible the management of an emergency and to limit its consequences.

Emergency incidents can be:

- Physical injury (incident)
- Fire
- Inclement weather
- Earthquake
- Leakage of Harmful Substances

An emergency incident should be immediately assessed and handled by the Emergency Team, depending on the degree of severity and always in accordance with the ERP.

After each emergency incident, the plan is reviewed and changes and revisions may occur.

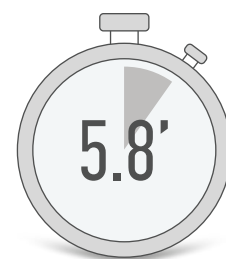
The Emergency Response Team of each project/activity is trained to deal with potential risks (such as fire, accidents, earthquake), conducts preparedness exercises and in the event of an incident recommends the assistance of external agencies or services if required (depending on the extent and severity of the situation) such as the ambulance, the Fire Service, the Police, etc.

The details of the Team of each project/activity of the Group as well as the emergency response steps, the escape route plans, the assembly point of the employees, are recorded in the ERP and are also part of the introductory training of the Group's employees and its subcontractors before the start of their work.

Conventional response
time to incidents



Actual response time
to events (average 2021)



● ATTIKI ODOS and ATTIKES DIADROMES

● MOREAS

In order to control traffic and handle incidents on the Attiki Odos and Moreas motorways, there is collaboration 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.

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, it focuses on supporting local suppliers, where feasible, thus strengthening the local market. In 2021, the Group's companies acquired 94% of their supplies from local suppliers. Local suppliers are those suppliers whose headquarters are located in the country where the Group's business is conducted, while significant locations are defined as the countries of operation that are within the scope of this Report.

Supply Management

In accordance with the existing procedures and practices, in regard to supply management, procurement is carried out individually per company and/or project, based on predetermined specifications and market research and on the accessibility of local suppliers. Supplies from non-registered suppliers are excluded, excluding in exceptional, fully justified cases. Specifically, for supplies of €100,000 or more, the supplier must be approved based on the Group's regulatory compliance criteria, at the minimum.

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. For example, the Construction sector mainly uses engineering companies, steel reinforcement suppliers, earthworks subcontractors, subcontractors for electromechanical works - installations, steel structures, concrete, fuels, cement products, elevators, aluminium structures, etc. Similarly, the companies of the Concessions segment mainly cooperate with maintenance contractors, software and maintenance companies for Toll and Traffic systems, companies providing

money transfer, security and security services and the distribution of subscriber bills, suppliers of electrical equipment and road safety equipment.

Optimisation of Procurement 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 consist 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 systemic procurement flow, was approved in 2020.

Promotion of Responsible Business Practices to the Group's Partners

The Group encourages its suppliers and partners to operate in a responsible manner, taking into account the Code of Ethics and the Code of Conduct for Business Partners and asking for their commitment to comply with the principles reflected therein.

The Code of Conduct for Business Partners, approved in October 2021, explains what ELLAKTOR expects from its business partners in terms of business ethics, human rights, employee relations, health and safety, and other issues related to sustainable and accountable business practices.

In 2021, there were no incidents or issues regarding human rights violations by the approved suppliers working with the Group.

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In 2021, the Group's companies acquired 94% of their supplies, from local suppliers



ANNEX

REPORT METHODOLOGY

The purpose of the Sustainable Development Report is to fully and comprehensively present the sustainable development actions of ELLAKTOR Group in 2021 and to inform stakeholders about them. In conjunction with the disclosure of the Group's actions over the previous year, this Report presents the Group's new business model and ESG strategy for sustainable development.

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

The 2021 Sustainability Report refers to the reporting period from 01.01.2021 to 31.12.2021 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 2021 Sustainable Development Report represent 95% 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 are presented in the **Environment chapter**, please note that:

- The data regarding AKTOR's and HELECTOR's joint ventures are aggregate and do not correspond to the share of the company in the joint ventures.
- The data for the company REDS include only the common areas of the Smart Park and not the areas that are rented out.

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 2022 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" segments.

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** (a dss+ company).

The Report was subject to external assurance for the second year in a row (**see Independent Limited Assurance Report**).

For any clarifications regarding the Sustainable Development Report for 2021, please contact:

ESG Strategy & Sustainable Development Division
Tel.: +30 2108185058
E-mail: sustainability@ellaktor.com
25 Ermou St., 14564 Nea Kifisia

GRI STANDARDS TABLE

The Global Reporting Initiative (GRI) Sustainability Reporting Guidelines and, in particular, the GRI Standards Guidelines were taken into account for the preparation of this Report. The 2021 Sustainable Development Report was 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, and indicator 306, for which the 2020 edition has been used.

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
GRI 101 Foundation		
GRI 102 General Disclosures		
Organisational profile		
102-1	Name of the organization	ELLAKTOR S.A. is the parent company of the ELLAKTOR Group.
102-2	Activities, brands, products, and services	Report page: 12-19
102-3	Location of headquarters	25 Ermou St., 145 64 Nea Kifisia
102-4	Location of operations	Report page: 13
102-5	Ownership and legal form	ELLAKTOR Public Limited Company Engineering, Holding and Services Société Anonyme.
102-6	Markets served	Report page: 13
102-7	Scale of the organization	Report page: 12, 109-111
102-8	Information on employees and other workers	Report page: 12, 101-102
102-9	Supply chain	Report page: 140
102-10	Significant changes to the organization and its supply chain	Report page: 12-20
102-11	Precautionary Principle or approach	Report page: 12-20, 30-33, 52-53, 56-58, 63-64, 85-86, 112-116, 126-128, 133-139
102-12	External initiatives	Report page: 20-21, 30-33

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
102-13	Membership of associations	Report page: 20-21
Strategy		
102-14	Statement from senior decision-maker	Report page: 6-7
Ethics and Integrity		
102-16	Values, principles, standards, and norms of behavior	Report page: 23-24, 126-139 2021 Annual Financial Report, (p. 31)
Governance		
102-18	Governance structure	Report page: 127
Stakeholder engagement		
102-40	List of stakeholder groups	Report page: 35
102-41	Collective bargaining agreements	Report page: 107
102-42	Identifying and selecting stakeholders	Report page: 35-37
102-43	Approach to stakeholder engagement	Report page: 28-29, 35-37
102-44	Key topics and concerns raised	Report page: 35-37, 116
Reporting Practices		
102-45	Entities included in the consolidated financial statements	Report page: 144 2021 Annual Financial Report, (p. 152 - 161)
102-46	Defining report content and topic Boundaries	Report page: 144, 147-151
102-47	List of material topics	Report page: 28-29

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: 144
102-49	Changes in reporting	Any significant changes (where they exist) are noted with comments within the text and/or with footnotes. Report page: 144
102-50	Reporting period	Report page: 144
102-51	Date of most recent Report	July 2021
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the Report	Report page: 144
102-54	Claims of reporting in accordance with the GRI Standards	Report page: 144
102-55	GRI Content Index	Report page: 145-153
102-56	External assurance	Report page: 161-164

TOPIC – SPECIFIC DISCLOSURES – MATERIAL TOPICS

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 the local communities in which it operates. Report page: 28-29, 38-43, 109-116
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
201-1	Direct economic value generated and distributed	Report page: 109

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: 28-29, 38-43, 126-132
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	Report page: 131-132
205-3	Confirmed incidents of corruption and actions taken	Report page: 131
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 subcontractors. Report page: 28-29, 38-43, 92-99, 108
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
403-1	Occupational health & safety management system	Report page: 93-94, 134-136
403-2	Hazard identification, risk assessment, and incident investigation	Report page: 92-94
403-3	Occupational health services	Report page: 92-94
403-4	Worker participation, consultation, and communication on occupational health and safety	Report page: 92
403-5	Worker training on occupational health and safety	Report page: 98-99
403-6	Promotion of worker health	Report page: 93-94, 108
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Report page: 92-99

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
403-8	Workers covered by an occupational health and safety management system	For Group companies where ISO 45001 certification applies, all employees are covered by this Management System. Report page: 93
403-9	Work-related injuries	Rate of fatalities as a result of work-related injury: 0.2 Rate of high-consequence work-related injuries (excluding fatal accidents): 0.13 The above indicators were calculated by every 1 million working hours. Total working hours: 15,256,198 Report page: 95-97
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 Group's operation, 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: 28-29, 38-43, 52-55
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, subcontractors and users. Report page: 28-29, 38-43, 44-49
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 customers and users. Report page: 28-29, 38-43, 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: 28-29, 38-43, 133-139
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: 28-29, 38-43, 107-108
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: 101-103, 107-108, 128
406-1	Incidents of discrimination and corrective actions taken	Report page: 107-108
412-1	Total number of operations that have been subject to human rights reviews or human rights impact assessments	Report page: 107-108
412-2	Employee training on human rights policies or procedures	Report page: 107-108
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	In 2021, 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, investors, bondholders, the state and local communities. Report page: 28-29, 38-43, 63-72
103-2	The management approach and its components	
103-3	Evaluation of the management approach	

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
302-1	Energy consumption within the Organization	Report page: 66
302-3	Energy intensity	Report page: 66-67
305-1	Direct (Scope 1) GHG emissions	Report page: 70
305-2	Energy indirect (Scope 2) GHG emissions	Report page: 70
305-4	GHG emissions intensity	Greenhouse gas emissions per turnover amounted to 0.11 kg CO ₂ eq./€
305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Report page: 71-72
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: 28-29, 38-43, 56-57, 60-62, 75-84
103-2	The management approach and its components	
103-3	Evaluation of the management approach	
306-1	Waste generation and significant waste-related impacts	Report page: 63-64
306-2	Management of significant waste-related impacts	Report page: 56-57, 60-61, 63-64
306-3	Waste generated	Report page: 76-84
306-4	Waste diverted from disposal	Report page: 76-84
306-5	Waste directed to disposal	Report page: 56-57, 76-84

TOPIC - SPECIFIC DISCLOSURES – OTHER TOPICS

Market Presence

202-2	Proportion of senior management hired from the local community	Report page: 101
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GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Procurement practices		
204-1	Proportion of spending on local suppliers	Report page: 140
Water and Effluents		
303-3	Water withdrawal	Report page: 73-75
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: 87-88
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.
Employment		
401-1	New employee hires and employee turnover	Report page: 103
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Report page: 108
401-3	Parental leave	Report page: 108
Training and Education		
404-1	Average annual hours of training per employee	Report page: 104
404-2	Programs for upgrading employee skills and transition assistance programs	Report page: 104-106
404-3	Percentage of employees receiving regularly performance and career development review	Report page: 106

GRI STANDARDS	DISCLOSURE	SECTIONS / ADDITIONAL COMMENTS
Local Communities		
413-1	Operations with local community engagement, impact assessments, and development programs	Report page: 116
Public Policy		
415-1	Political contributions	In 2021, no monetary or in-kind donations were made to political parties.
Marketing and Labelling		
417-3	Incidents of non-compliance concerning marketing communications	In 2021 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: 132

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	SECTIONS / ADDITIONAL COMMENTS
Environmental		
C-E1	Scope 1 emissions	GHG intensity of Scope 1 emissions (tCO ₂ e) = 28,389/952 = 29.82 Normalisation factor: €952 million pre-consolidation revenue. Report page: 70
C-E2	Scope 2 emissions	GHG intensity of Scope 2 emissions (tCO ₂ e) = 61,938/952 = 65.01 Normalisation factor: €952 million pre-consolidation revenue. Report page: 70
C-E3	Energy consumption and production	Total energy consumption within the organization: 249,852 MWh Percentage of electricity consumed (%): 41% Percentage of energy consumed from renewables (%): 15% Total energy production: 1,379,510 MWh Percentage of energy produced from renewables (%): 100% Report page: 66
A-E1	Scope 3 emissions	GHG intensity of Scope 3 emissions (tCO ₂ e) = 12,890/952 = 13.54 Normalisation factor: €952 million pre-consolidation revenue. Report page: 71
A-E2	Climate change risks and opportunities	2021 Annual Financial Report, (p. 11-24) Report page: 52-53, 56-57, 63-64

ATHEX METRIC ID*	METRIC TITLE	SECTIONS / ADDITIONAL COMMENTS
A-E3	Waste management	Report page: 75-84
A-E5	Biodiversity sensitive areas	Report page: 87-88
SS-E4	Water management	Report page: 74-75
SS-E6	Backlog cancellations	There were no backlog cancellations in 2021.

Social		
C-S1	Stakeholder engagement	Report page: 36-37
C-S2	Female employees	Report page: 101-102
C-S3	Female employees in management positions	Out of the top 10% of employees by total compensation, 20.4% are women. Report page: 102
C-S4	Employee turnover	Report page: 103
C-S5	Employee Training	Report page: 104-106
C-S6	Human rights policy	Report page: 107-108
C-S7	Collective bargaining agreements	Report page: 107
C-S8	Supplier assessment	Report page: 140
A-S1	Sustainable economic activity	Report page: 110-111
A-S2	Employee training expenditure	Report page: 104
A-S3	Gender pay gap	The gender pay gap for the Group is 15% in favour of men.
A-S4	CEO pay ratio	CEO pay ratio = 6.9 CEO's annual total compensation* (€227,220)/Median annual compensation for all employees** (€33,105) Remuneration Report 2021

*Total earnings from ELLAKTOR S.A.
**Average gross earnings of ELLAKTOR and RES segment personnel.

ATHEX METRIC ID*	METRIC TITLE	SECTIONS / ADDITIONAL COMMENTS
Social		
SS-S6	Health and safety performance	Accident frequency rate: 0.63 Accident frequency rate = (Total number of injuries / Total hours worked) x 200,000. Accident severity rate: 21.72 Accident severity rate = (Total calendar days lost due to accidents / Total hours worked) x 200,000. Report page: 95-97
Governance		
C-G1	Board composition	Report page: 128-129
C-G2	Sustainability oversight	The ESG Strategy & Sustainable Development Division is part of the Group's Strategy Division, while the overall supervision of sustainable development issues is carried out by the Sustainable Development Committee. 2021 Annual Financial Report, (p. 89). Report page: 23
C-G3	Materiality	Report page: 28-29
C-G4	Sustainability Policy	Report page: 23
C-G5	Business ethics policy	Report page: 130-131
C-G6	Data security policy	Report page: 132
A-G1	Business model	Report page: 23-27
A-G2	Business ethics violations	Report page: 131
A-G3	ESG targets	Report page: 38-43
A-G4	Variable pay	41% for the Group overall (€553,334/€1,346,384). Remuneration Report 2021, (p. 6, 7).
A-G5	External assurance	Report page: 161-164

*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.

UN GLOBAL COMPACT TABLE

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

PRINCIPLES OF THE UN GLOBAL COMPACT

UNGC PRINCIPLES	SECTIONS / ADDITIONAL COMMENTS
Human rights	
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights	Report page: 107-108
Principle 2: Businesses should make sure that they are not complicit in human rights abuses	Report page: 107-108
Labour	
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining	Report page: 107-108
Principle 4: Businesses should uphold the elimination of all forms of forced and compulsory labour	Report page: 107-108
Principle 5: Businesses should uphold the effective abolition of child labour	Report page: 107-108
Principle 6: Businesses should uphold the elimination of discrimination in respect of employment and occupation	Report page: 107-108
Environment	
Principle 7: Businesses should support a precautionary approach to environmental challenges	Report page: 63-67
Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility	Report page: 52-87
Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies	Report page: 52-62
Anti-corruption	
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	Report page: 130-132

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 HELECTOR company and its subsidiaries, which belong to the Environment segment.

CODE SASB	DESCRIPTION	SECTIONS / ADDITIONAL COMMENTS
ENVIRONMENT		
Environmental impacts of Project Development		
IF-EN 160a.1	Number of incidents of non-compliance with environmental permits, standards, and regulations	16 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) 7,104 tn CO ₂ eq.
IF-WM-110a.2	(1) Total landfill gas generated, (2) percentage flared, (3) percentage used for energy	(1) 1,771,943 MMBtu (2) 0.00% (3) 100.00%
Fleet Fuel Management		
IF-WM-110b.1	(1) Fleet fuel consumed, (2) percentage natural gas, (3) percentage renewable	(1) 16,925 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) 50.93 (2) 0.28 (3) 3.89
IF-WM-120a.2	Number of facilities in or near areas of dense population	None identified, in accordance with the official data of the Hellenic Statistical Authority for the population census (2011).

CODE SASB	DESCRIPTION	SECTIONS / ADDITIONAL 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-320a.1/ IF-WM-320a.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) 30 (2) 0.08 (3a) 0.49	(1) 12 (2) 0 (3a) 0.76
		WM		
IF-WM-320a.3	Number of road accidents and incidents	1		
Labor practices				
IF-WM-310a.1	Percentage of active workforce covered under collective bargaining agreements	74%		
IF-WM-310a.2	(1) Number of work stoppages and (2) total days idle	No recorded incidents of work stoppages.		
BUSINESS MODEL AND INNOVATION				
Recycling & Resource Recovery				
IF-WM-420a.1	(1) Amount of waste incinerated, (2) percentage hazardous, (3) percentage used for energy recovery	Report page: 60-61, 76-84		

CODE SASB	DESCRIPTION	SECTIONS / ADDITIONAL COMMENTS
IF-WM-420a.3	Amount of material (1) recycled, (2) composted, and (3) processed as waste-to energy	Report page: 60-61, 76-84
IF-WM-420a.4	Amount of electronic waste collected, percentage recovered through recycling	43.28 tonnes 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: 131
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: 128-132

ACTIVITY METRICS

IF-EN-000.A	Number of active projects	110
IF-EN-000.B	Number of commissioned projects	17
IF-EN-000.C	Total backlog	Report page: 18

INDEPENDENT LIMITED ASSURANCE REPORT

Limited Assurance Report to ELLAKTOR S.A.

We were assigned by the Board of Directors of ELLAKTOR S.A. (hereinafter the “Company”), to provide a limited assurance report on selected disclosures of the Greek version of the Group’s report titled: “Sustainable Development Report 2021” (hereinafter “the Report”), for the reporting period January 1, 2021 — December 31, 2021, of the Company and its subsidiaries, (collectively the “Group”).

The selected disclosures of the Report covered by the assignment of limited assurance are the following:

1. The qualitative data and statements corresponding to

the “General Disclosures” of the “Core” option of the Global Reporting Initiative (“GRI”) Standards, which are listed in the “GRI Standards Table” of the Report.

2. The qualitative (Management Approach & GRI 103) and quantitative data of the following selected “Topic-Specific Disclosures” listed in the “GRI Standards Table” of the Report: GRI 201-1, GRI 205-3, GRI 403-9, as well as GRI 403-5 (Management Approach) and GRI 306-2 (Management Approach).

3. The figures of the following “Topic-Specific Disclosures” which are mentioned in the “GRI Standards Table” of the Report:

GRI STANDARDS	DISCLOSURE TITLE
204-1	Proportion of spending on local suppliers
302-1	Energy consumption within the organization
303-3	Water withdrawal
305-1	Direct (Scope 1) GHG emissions
305-2	Energy Indirect (Scope 2) GHG emissions
306-3	Waste generated
306-4	Waste diverted from disposal
306-5	Waste directed to disposal
401-1	New employee hires and employee turnover
404-1	Average hours of training per year per employee
404-3	Percentage of employees receiving regular performance and career development reviews
405-1	Diversity of governance bodies and employees
406-1	Incidents of discrimination and corrective actions taken

4. The quantitative data of the following metrics of the “ESG Reporting Guide 2022” of the Athens Stock Exchange (“ATHEX”) listed in the “Athens Stock Exchange ESG Reporting Guide Table” of the Report:

ATHEX METRIC ID	METRIC TITLE
C-E1	Scope 1 emissions
C-E2	Scope 2 emissions
C-E3	Energy consumption and production
SS-E4	Water management
C-S2	Female employees
C-S4	Employee Turnover
C-S7	Collective bargaining agreements
SS-S6	Health and safety performance

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

Management are responsible for the prevention and detection of fraud incidents and for detecting and ensuring that the Group complies with the laws and regulations applicable to its activities.

Responsibility of the Company’s Management

The Company’s Management are responsible for the preparation and presentation of the Report, in accordance with the GRI Standards, as these are described in the section of the Report “Report Methodology”, with the “ESG Reporting Guide 2022” of the Athens Stock Exchange, as described in the section “Athens Stock Exchange ESG Reporting Guide Table” of the Report and the 10 United Nations Global Compact Principles, which are taken into account for the development of the Report, as described in the section entitled “UN Global Compact Table” of the Report, as well as the information and statements contained therein.

They are also 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.

Auditor’s Responsibility

Our responsibility is to carry out a limited assurance engagement and to express our conclusions based on the procedures we have carried out. This assurance work was carried out in accordance with the International Standard on Assurance Engagements 3000, “Assurance Engagements Other Than Audits or Reviews of Historical Financial Information”.

The standard requires that we plan and perform the engagement to obtain limited assurance about whether selected aspects of the Report are free from material misstatement.

KPMG applies the International Quality Control Standard 1 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 for Professional Accountants (including International Independence Standards, which is founded on the fundamental principles of integrity, objectivity, professional competence, and due care, confidentiality, and professional behavior.

Work performed

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. These procedures included:

- Inquiries made to Management to gain an understanding of the Group’s processes for determining material issues for its key stakeholders.
- Interviews with the relevant executives of the Group, regarding the sustainable strategy and policies for material issues, and the implementation of these across the business.
- Interviews with the relevant executives and representatives of the Group who are responsible for providing the information contained in the Report. In this context, we examined on a sample basis, the reliability of the data references of our agreed assurance scope for: a) the “General Disclosures” and “Topic-Specific Disclosures” of the “GRI Standards Table” of the Report, and b) the quantitative data of the indicators of the “ESG Reporting Guide (2022)” of the “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.
- Comparison of the information in the Report within our agreed assurance scope, with the corresponding information contained in the relevant sources, to determine whether the relevant information has been included in the Report.
- Reading the information presented in the Report within our agreed assurance scope, to determine,

whether it is in line with our overall knowledge of, and experience with, the sustainability performance of the Group.

- Review, 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 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 (2022)” within our assurance scope.
- Review 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 (2022)” within our assurance scope.

Procedures performed on a limited assurance project differ in nature and duration of time and are less extensive than a reasonable assurance project. Therefore, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained if a reasonable assurance project had been performed.

Our conclusions

We believe that the evidence we have gathered is sufficient and appropriate to provide a basis for our conclusions. Based on the procedures carried out and the evidence gathered, as described above, **nothing has come to our attention that would lead us to the conclusion that:**

- The “General Disclosures” and the “Topic-Specific Disclosures” of the Report, as defined above, for the year ended 31 December 2021 have not been prepared, in all material respects, in accordance with the requirements of the GRI Standards, as described in the section of the Report “Methodology of the Report”.
- The quantitative data of the indicators of the “ESG Reporting Guide (2022)” of the Report, as defined above, for the year ended 31 December 2021 have not been compiled, in all material respects, in accordance with the requirements of the “ESG Disclosure Guide (2022)” of Athens Stock Exchange.

- The Report for the year ended 31 December 2021 has not taken into account the 10 United Nations Global Compact Principles in all material respects, as described in the “UN Global Compact Table” section of the Report.

In accordance with the terms of our assignment, this independent auditor’s limited assurance report on the Sustainable Development Report 2021 has been prepared for ELLAKTOR S.A., in order to be incorporated into the Report and for no other purpose or in any other context.

Restrictions of use

Our report is intended solely for the information and use of ELLAKTOR S.A. in accordance with the terms of the limited assurance engagement and is not intended and should not be used by anyone other than ELLAKTOR S.A.

KPMG Certified Auditors S.A.
SOEL Reg. No. 114



Dimitrios Tanos, Certified Public Accountant
SOEL Reg. No 42241
Athens, 27 July 2022

