

SUSTAINABLE DEVELOPMENT REPORT

2022



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Message from the Management

2022 was a year marked by new, mainly exogenous challenges, with implications for both the country's economy and the society.

The aftermath of the COVID-19 pandemic, which is now fading out, combined with the newly emerging consequences of the war in Ukraine, have created a new economic reality with a significant increase in inflation, raw material prices and financing rates, among other challenges. The energy crisis that had made its first appearance at the end of 2021 continued in 2022 to create upheavals for the national and international goal of the energy transition. Under those circumstances, enterprises and society had to confront a new wave of rising prices, new difficulties in achieving growth, and even preservation challenges, which used to and are still imposing threats to their sustainability and prosperity.

However, 2022 was also a year of remarkable resilience for our national economy, with signs of positive prospects for further growth. Capitalizing the reforms of recent years, and despite successive challenges,

Greece seems to have created a solid business and investment environment, a significant social policy, as well as the necessary frame for the development of adjustment and flexibility mechanisms required by the changing environment, which creates positive prospects for the resilience of its development.

The successful recovery of the last few years is crowned by a series of events and forecasts for the course and future of our economy, coming from both domestic and international institutions.

A first important milestone that marks Greece's positive momentum is the expected upgrade of its credit rating and the regaining of its investment grade rating by the end of the year, after 12 years. A recent Bank of Greece report predicts strong resilience to the challenges of the energy crisis and inflation and a corresponding strong and sustainable growth of the Greek economy.

At the same time, the continuous upward trend in tourism since 2021, the extroversion of the Greek economy manifested by the increase of exports of goods and services, which as a percentage of GDP almost doubled compared to 2010, the European support mechanism NextGenerationEU, as well as the cleaning of balance sheets and the return to profitability for the Greek banks, are the driving force



Georgios Mylonogiannis
Chairman of the Board

for the achievement of a healthy and modern economy. Finally, the EU Green Deal, the principles set by the EU taxonomy for environmentally sustainable investments, the necessity of energy transition and the support of the circular economy are challenges that can become opportunities for the Greek econ-



Efthymios Mpouloutas
Chief Executive Officer

omy and the businesses operating within it. Finding answers to the new international challenges, to transform them into opportunities to secure the recovery trajectory that the Greek economy had entered, was also a key challenge, at a smaller scale of



our organization, in order to preserve the continuity of the Group's growth course that had already started to be charted from 2021.

In this difficult yet promising business environment, ELLAKTOR Group's commitment to an operational strategy of consolidation and progress was the basis for the completion of a series of initiatives launched in the last two years that laid the foundations for a healthy, sustainable and self-fueled growth.

Specifically, in 2022, ELLAKTOR Group repaid its €670 million International Bond Loan two years earlier than its maturity date, thus relieving the Group from €42 million in financial costs per year. In the



2022 was a year of many new initiatives to further enhance Sustainable Development but also a year of significant operational milestones

Construction segment, the operating result (EBITDA) was balanced, and the segment returned to positive operational profitability. The Group in 2022 recorded after tax profitability, after 10 years of losses, and drastically deleveraged its balance sheet. This growth, combined with a total Operating Turnover that exceeded €1 billion (€1.04 billion) for 2022, ranked the Group 97th among the largest construction groups worldwide (Global Powers of Construction (GPoC) 2021, Deloitte - July 2022).

At the core of this progress, Sustainable Development has continued during 2022 being a key pillar of the development model with a leading role in the operational planning of its activities. Following best international practices and recognized standards, the Group ensured the integration of Environment, Society and Governance (ESG) factors in its business segments, combining financial performance and ESG footprint for even stronger growth.

2022 was a year of many new initiatives to further enhance Sustainable Development but also a year of significant operational milestones. More specifically, a **double materiality analysis** was carried out in accordance with the **GRI Standards**, the **design of**

the Roadmap towards zero greenhouse gas emissions by 2050 was launched - and continues to this day, the **process of identification and analytical assessment of climate risks and their potential financial impacts in line with the TCFD recommendations (Task Force on Climate - related Financial Disclosures)** is underway and the **design of a Climate Risk Mitigation Program** has progressed. At the same time, the Group was included for the first time in the "Financial Times Stock Exchange4Good (FTSE4Good) Index Series".

E

Continuing the successful path of 2021, the Group's 2022 **ENVIRONMENTAL** footprint is significantly strengthened with the aim of achieving climate neutrality and green transition.

Within the year, **30% of the Group's activities have been classified as eligible and aligned according to the EU Taxonomy**, while **greenhouse gas pollutants (GHGs) emissions have been reduced by 24% compared to 2021**. At the same time, the **contribution to emission prevention was recorded at 1,300 thou-**

sand tonnes of carbon dioxide equivalent (CO2 eq.) through the production of more than 1,350 GWh of electricity from RES, while **energy consumption intensity has been reduced by 12% compared to 2021**. In the same year, we managed a total of **949 million tonnes of waste from the respective treatment plants** which the companies of the Group's **Environmental segment operate**, and at the same time we completed **€2 million of investments in environmental protection initiatives**.



S

In 2022, the **Group’s contribution to SOCIETY amounted to €3.7 million** through corporate social responsibility actions.

ELLAKTOR Group continued in 2022 to make a substantial contribution and provide support to the local communities in which it operates through projects that improve and support local infrastructure. The **percentage of all employees from local communities increased in 2022 from 60% to 80% in total and from 65% to 81% for management.** At the same time, **92% of the Group’s company purchases came from domestic suppliers in the regions where the Group operates.**

In 2022, the Group significantly increased its voluntary social contribution activities by supporting the work of notable non-profit organizations, such as Make-A-Wish, Wise Greece and We4All, with the aim of providing services to vulnerable

social groups and further cultivating and enhancing the culture of volunteerism. A **Sponsorships and Donations Committee and a relevant policy for these actions** was established.

The Group has also set as a key priority, in line with the Group’s principles and values, the **promotion of Diversity, Equity and Inclusion in the workplace.** For this reason, we have developed a series of initiatives such as the implementation of a **new Diversity, Equity & Inclusion Policy** and the **signing of the U.N. Women’s Empowerment Principles (WEPs), a joint initiative of UN Global Compact and UN Women.**

G

In 2022, the Group’s **GOVERNANCE** was further strengthened with actions that prioritize transparency and regulatory compliance issues.

In this context, the Group recorded **zero incidents of discrimination and corruption** and was the first Greek company to receive a certification for **ISO 37000:2021 - Governance of Organizations.**

A key pillar of Sustainable Development is **innova-**

tion and digital transformation. This is an inexhaustible process of continuous evolution, observing the current trends and the needs of the future. Therefore, in 2022, the Group participated in **8 major research projects in collaboration with national and international institutions** and implemented **investments of €2.5 million in digital transformation activities.**

The great upheavals of the last three years have marked the world’s transition to a new reality. We are living in a time when previous perceptions and attitudes are being tested, practices are being challenged, and it is becoming clear that humanity as a whole will have to change its ways of acting immediately in order to make its future and the future of the planet sustainable.

In this ever-changing environment, challenges will always be present while opportunities will always come up. It is the responsibility of all of us to respond with flexibility and insight, turning threats and risks into opportunities to evolve our business and improve our footprint, while giving meaning to the concept of green and sustainable development, modernizing the economy and society and

reorienting them towards a secure, contemporary and sustainable future.

Georgios Mylonogiannis

Chairman of the Board

Efthymios Mpouloutas

Chief Executive Officer

The Report has been prepared in accordance with the guidelines of the Global Reporting Initiative (GRI), the new Non-Financial Reporting Guidelines of Athens Exchange, the Global Compact principles and the guidelines of the Sustainability Accounting Standards Board (SASB), while it has been externally audited to assure its content.



At a Glance 2022

MAIN OPERATIONS



ELLAKTOR GROUP

30%
of the Group's activities eligible and aligned with the EU Taxonomy

€1,044 mil.
million Net sales

45%*
EBITDA growth

15%
increase in the backlog in the Construction segment

**Including discontinued operations*

ENVIRONMENT



1,266 th. tonnes
avoidance of third-party CO₂ eq. emissions

8,172
hours of training

24%
emissions reduction of scope 1 & 2 compared to 2021

89%*
of waste diverted from disposal, from the Group's operation

958 th. tonnes
of solid &

297 mil. m³
of third-party wastewater managed at the treatment facilities

**from the operation of the Group*

SOCIETY



44%
female employees at head office

279
internal H&S audits

17,562
15minute Health & Safety toolbox talks

38,105
hours of training



Doubling
of volunteering hours compared to 2021

80% employees &
€3.7 mil. investments in Society

81%
executives from the local community

GOVERNANCE



92%
of supplies procured from local suppliers



Participation in
8
research projects

0
confirmed incidents of corruption and personal data breaches

€2.5 mil.
investments in digital transformation



ELLAKTOR GROUP

ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS



ALIGNMENT WITH THE PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT



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Main achievements



30% of the Group's activities eligible and aligned with the EU Taxonomy



Double materiality analysis for the first time



Participation for the first time in the FTSE4Good sustainability index

Material topics

Economic value **generation** and **distribution**

Our performance

€1,044

million Net sales

45%*

EBITDA growth

**Including discontinued operations*

15%

increase in the backlog in the Construction segment

22%

increase in people visiting at the Smart Park

17.4%

increase in traffic on highways

5

municipal waste treatment plants with a capacity exceeding 800,000 tonnes per year

Group presentation

ELLAKTOR Group is one of the largest infrastructure groups in Greece and one of the leading infrastructure groups in Southeastern Europe. With an international presence in 17 countries and a diversified portfolio of activities focused on Construction, Concessions, Environment, Real Estate Development and Services and Renewable Energy Sources, the Group invests in creating a modern and sustainable world. Combining its 70 years of history, the experience and expertise of its human capital, as well as 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 in the quality of life in the long term. Its mission is to provide high quality infrastructure, energy and environmental projects, promote the circular economy with innovative waste management solutions and strengthen its footprint in green energy production, while creating added value for all its stakeholders.

Group Structure - Countries of Operations

The Group, which consists of 99 subsidiaries and over 15 affiliates and 140 joint ventures, recorded a turnover of €1,044 million for the financial year 2022.



Europe **10** COUNTRIES

Albania, Germany, Greece, U.K., Italy, Croatia, Cyprus, Romania, Serbia, Czech Republic

South America **4** COUNTRIES

Argentina, Brazil, Colombia, Chile

Asia **2** COUNTRIES

Jordan, Qatar

Oceania **1** COUNTRIES

Australia

All Group companies and joint ventures are presented in the [Annual Financial Report 2022](#).

46.14%
Total Participation

REGGEBORGH INVEST B.V.

30.52%

REGGEBORGH
INVEST B.V.

15.62%

RB ELLAKTOR
HOLDING B.V.

Shares

348,192,005

14.19%

Free
float (<5%)

9.80%

Atlas NV

29.87%

MOTOR OIL
(HELLAS)
CORINTH
REFINERIES S.A.

Shareholding

ELLAKTOR S.A. is incorporated and established in Greece. The address of its headquarters and main offices is 25 Ermou Street, 145 64, Kifissia, Attica.

The shareholding of ELLAKTOR S.A., according to the latest notifications of the liable persons (Law 3556/2007) as it formed on 31.12.2022, is presented in the adjacent diagram.

Further information regarding the Company's shareholder structure is provided in the [Annual Financial Report 2022](#).



Vision - Mission - Values

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 Environment projects, we foster circular economy with innovative waste management solutions, while enhancing our footprint in green energy, creating value for our shareholders, our employees and the Greek Economy and Society.

CORPORATE VALUES

Meritocracy and Equal opportunities

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



Collaboration and Excellence

Encourage team effort, collaboration and excellence at individual and collective level.



Achievement and Efficiency

Be committed to high-quality work, transparency and flexibility of our 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.



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.



Health and Safety

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





Key Segments

The Group is active in the infrastructure industry and specifically in the Construction, Concessions, Environment, Real Estate Development and Services, and Renewable Energy Sources segments.



CONSTRUCTION

ELLAKTOR Group operates in the Construction segment through **AKTOR**, its largest subsidiary. Specializing in the latest technologies and with an international presence in the infrastructure projects, the company provides a wide range of diversified services in Construction, Photovoltaic Parks, Quarry Activities, Technical Facilities and Project Management, creating innovative and sustainable projects that contribute to the evolution of the sector.

The portfolio of projects includes highways, railway projects, shopping centers, leisure and hotel facilities, healthcare facilities, cultural centers, biological treatment projects, Olympic sports complexes, natural gas pipelines and refineries, port projects, reconstructions, power plants, electromechanical projects, etc.

Major Group companies:

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

Important events

The Construction segment reported revenues of €554.7 million in FY 2022 compared to €462.7 million in FY 2021, an increase of 20%, mainly driven by the activity in Greece and the contribution of new projects, the construction of which started in 2022.

In terms of project implementation, emphasis was placed on the progress of the Thessaloniki Metro, the Bucharest Centura A0 ring road, as well as the implementation of main road axes and railway projects, in Greece and Romania.

The Group has decided to focus its operations in Greece and Romania, a country with significant needs in infrastructure projects, in which it has many years of experience.

In addition, the Group is taking a selective approach with regard to the pursuit of contracts in the State of Qatar, with Facility Management (O&M) contracts.

AKTOR and its subsidiaries signed in 2022 new contracts amounting to €907 million in Greece and abroad, while additional contracts amounting to €45 million have been signed after 31.12.2022.

Further information on the outlook, risks and uncertainties of the Construction segment is presented in the [Annual Financial Report 2022](#).

2022 Review

€555 million

turnover

14 countries

of operations

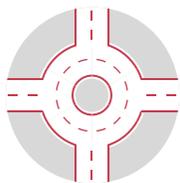
€2.9* billion

total backlog increased by 15% compared to 2021

€907 million

of new contracts in Greece and abroad in 2022

**Includes projects under construction, contracts signed after 31.12.2022, as well as projects where the Construction segment is the lowest-cost bidder.*



CONCESSIONS

ELLAKTOR Group operates in the Concessions segment through its subsidiary, **AKTOR CONCESSIONS**. AKTOR CONCESSIONS is the largest Greek company in this segment, with activity covering all the needs of projects, from design, financing and construction to maintenance and operation.

Having paved the way for major Concession Projects in the country since 1990, the portfolio of AKTOR CONCESSIONS currently includes participations in the largest and most modern highways in Greece.

It has a majority stake in ATTIKI ODOS (65.8%) and MOREAS (71.7%) highways, but also significant shares (17-28%) in Olympia Odos and Aegean Motorway, as well as in Rio-Antirrio Bridge. In addition to highways, the company is also involved in the concession of car parking lots with a capacity of 5,639 spaces and the operation of another 2,195 spaces.

In addition, AKTOR CONCESSIONS has signed a Concession Agreement for the right to use, operate, manage and exploit Alimos Marina, the largest marina in the Balkans.

Important events

In 2022, the Concessions segment's revenues amounted to €269.0 million compared to €233.3 million in 2021, representing an increase of 15.3% or €35.7 million. This increase in revenues is due to the increase in traffic on all highways, especially Attiki Odos, compared to 2021.

AKTOR CONCESSIONS seeks to expand its portfolio of concession projects and in this context participates in the tendering of new concession projects and Public-Private Partnerships (PPPs).

It is worth noting that on 23 November 2022, an agreement was signed between AKTOR CONCESSIONS S.A. and AVAX S.A. for the purchase of shares of the companies GEFYRA S.A. and GEFYRA LITOURGIA S.A. As a result, AKTOR CONCESSIONS' shareholding in GEFYRA S.A. and GEFYRA LITOURGIA S.A. now amounts to 27.71% and 29.48% respectively.

Further information on the outlook, risks and uncertainties of the Concessions segment is presented in the [Annual Financial Report 2022](#).

Major 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.

2022 Review

€269 million

turnover (15.3% increase compared to 2021)

755 km

of highways are managed and operated by the Group's companies

17.4%

increase in traffic on motorways compared to 2021

147 km

of highways under construction with participation in consortia





ENVIRONMENT

ELLAKTOR Group operates in the Environment segment for more than 20 years through its subsidiary **HELECTOR**. HELECTOR is a

fully integrated company in the field of waste management and green energy production. Its significant expertise and specialization allow HELECTOR to provide integrated waste management solutions, including the design, construction and operation of modern waste treatment plants, as well as alternative fuel production and biogas and biomass energy recovery projects.

As one of the leading companies in Southeastern Europe with presence in 8 countries, it is the only Greek company that owns and applies cutting-edge technologies in its sector.

Important events

The Environment segment's turnover for 2022 amounted to €122.5 million, compared to €115.1 million in 2021, registering an increase of 6.4%, mainly due to the increase in the volume of incoming municipal waste, the increase in the prices of recovered recyclable materials and compensation related to extra-contractual work of past years, which were largely offset by the increase in energy costs and the reduction in the volumes of incoming clinical waste.

More information on the outlook, risks and uncertainties of the Environment segment is presented in the [Annual Financial Report 2022](#).



2022 Review

€123 million

turnover

949,350

tonnes of waste managed

4 biogas power plants

for electricity generation with a total capacity of **33 MW** and **3** wind farms with a total capacity of **7.8 MW**

contributing to the avoidance of

879 th. tonnes

CO₂ eq. (third-parties)

Major Group companies:

- HELECTOR S.A., STEILISATIONS S.A.,
- APOTEFROTIRAS S.A., EDADYM SINGLE MEMBER S.A., SOLID WASTE RECYCLING S.A., BEAL S.A., J/V PRASINOU EMA, EPALTHEA S.A., AEIFORIKI DODEKANISOU S.A., GREEN FACTORY J/V HELECTOR S.A - WATT S.A. ENVIROPLAN - ARSI S.A. (EMA)



REAL ESTATE DEVELOPMENT AND SERVICES

ELLAKTOR Group operates in the Real Estate Development and Services segment through its subsidiary, **R.E.D.S.**, which is one of the leading companies in the sector with activities in Greece and abroad. The company's business strategy is focused on the development of Shopping, Tourism and Leisure Centers - Parks, Organized Housing Complexes, Exhibition Centers, Office Buildings and Green Mixed-Use Developments. At the same time, the Real Estate Development and Services division of ELLAKTOR Group provides services to third-parties by undertaking the design, support in the legal, urban planning, territorial and technical framework for the development of large private investments, construction and development management, design, leasing strategy and real estate management, as well as sustainability studies and the preparation of business plans. The company's portfolio consists of award-winning projects with international distinctions that seal in the best possible way the identity, philosophy and quality of its work. R.E.D.S has constructed and operates Smart Park Retail Park, while Alimos Marina, Gournes Heraklion and Cambas Park projects are under development.

Major Group companies:

REDS REAL ESTATE DEVELOPMENT S.A., YIALOU COMMERCIAL & TOURIST S.A., KANTZA EMPORIKI S.A., GOURNES DEVELOPMENT REAL ESTATE SINGLE-MEMBER S.A., PMS PROPERTY MANAGEMENT SERVICES S.A.

Important events

The Real Estate Development and Services segment presented, for the period 2022, annual revenues of €9.8 million, compared to €7.6 million for the year 2021, an increase of 29.6% or €2.2 million.

In addition, in relation to the development of Cambas Project in the area of Kantza in the municipality of Pallini, the business plan was updated and the finalization of the master plan will follow. Subsequently, R.E.D.S. will proceed with the issuance of building permits, so that construction work may begin.

In addition, in February 2023, the signing of the contract for the sale and purchase of the property of the former US base in Gournes, in Heraklion, Crete, was completed. In the context of developing the 345,567 sq.m. property, R.E.D.S. is expected to implement investments for the development of, among others, a luxury hotel, residential units and a shopping mall. The property also provides for the possibility of developing a casino.

More information on the prospects, risks and uncertainties of the Real Estate Development and Services segment is presented at the [Annual Financial Report 2022](#).

2022 Review

€10 million

turnover

6.1 million

visitors to Smart Park

53,300 sq.m.

total surface at Smart Park, the largest retail park in Greece

95%

commercial occupancy of Smart Park



RENEWABLE ENERGY SOURCES

ELLAKTOR Group operates in the segment of **Renewable Energy Sources (RES)** for more than 20 years, developing, constructing and operating wind and photovoltaic parks, both in Greece and abroad. Both the existing wind farms and those under development are located in strategically selected locations, which have specific characteristics for the installation of wind farms with high efficiency factors.

Major Group companies:

ELLAKTOR S.A., ANEMOS RES SINGLE-MEMBER S.A., ANEMOS RES HOLDINGS S.A.



Important events

Within the fiscal year 2022, the Renewable Energy Sources (RES) segment was spun off and transferred to the newly established "ANEMOS RES SINGLE-MEMBER S.A", which was established for this purpose. This process was completed on 14.12.2022, after the receipt of all the necessary approvals and permits from the competent authorities in accordance with the applicable legislation, with the implementation of the transfer of the RES segment to ANEMOS RES HOLDINGS S.A. (ANEMOS HOLDINGS), a 75% subsidiary of MORE, in which ELLAKTOR holds a 25% stake.

The turnover of Renewable Energy Sources (RES) in 2022 amounted to €99.5 million compared to €105.7 million in 2021, a decrease of 5.8% or €6.2 million.

The total installed capacity of the RES segment amounted to 493.4 MW. In addition, 1,502 MW of RES projects are in various stages of licensing.

Electricity generation in 2022 amounted to 1,125 GWh, down by a marginal 0.4% compared to the same period last year (1,129 GWh). The average capacity factor* for the period was 26.0%, remaining at the same levels with the previous year.

More information on the outlook, risks and uncertainties of the Renewable Energy Sources segment is presented in the [Annual Financial Report 2022](#).

2022 Review

20 years

of experience in the renewable energy segment

493 MW

of installed capacity of RES projects

24

wind farms in operation

1,125 GWh

of electricity generation from RES in the system and contribution to the avoidance of **388 th. tonnes** of CO₂ eq. third-party emissions

* Capacity Factor is the ratio of the electricity produced during a period of time to the maximum possible energy that could be produced in the same period, if the plants operated at 100% of their capacity.

Business model

Economic Value Generated and Distributed

One of the most material issues for ELLAKTOR Group is economic value generation and distribution, as it ensures business continuity, increases the Group's positive impact on society and returns value to its stakeholders. The Group contributes to social welfare through its business activities and the implementation of specific social actions, always aiming at the best possible respond to society's expectations.

GROUP FINANCIAL RESULTS FOR 2022

The Group's consolidated turnover, from all its activities in Greece and abroad, for the fiscal year 2022 amounted to €1,043.5 million, of which €944 million relates to the Group's continuing operations, compared to €915.5 million in the fiscal year 2021, representing an increase of 14%.

The consolidated financial data of the Group for the 2022 fiscal year, reflects the following key indicators:

Assets: **€2,452,408 th.**

Liabilities: **€1,538,884 th.**

Equity: **€913,524 th.**

The [Annual Financial Report 2022](#), which includes the Report of the Board of Directors and the Annual Financial Statements, is available on the Group's website.

Economic Value 2022 (th. €)	ELLAKTOR Group (Total)	Continuing Operations
Net Sales	1,043,544	944,042
Financial income, other income and profits	127,648	124,508
Economic value generated	1,171,192	1,068,549
Operating cost ¹	800,432	755,935
Employees' salaries and benefits	189,581	187,798
Salaries and wages	141,331	139,715
Social insurance expenses	29,416	29,101
Costs of defined benefit programs	3,875	4,059
Other benefits to employees	14,959	14,922
Payments to capital providers	105,976	93,007
Payments to the State	51,383	49,418
Contribution to Society ²	3,731	664
Economic value distributed	1,149,997	1,086,822
Economic value retained	21,195	(18,273)

¹ The amount relating to Operating Costs includes the cost of freelancers.

² The amount relates to donations (financial and in kind), as well as sponsorships for social activities, of which €2.6 million relate to activities to support the local community where the Group operates and €1.1 million to activities to support the wider community.

€2,993 thousand is the compensatory fee of 3% on the turnover (sales before VAT) of the wind farms that is retained and paid to the local community and the Green Fund, as well as €8,220.39 which is a compensatory fee of 1% on the turnover (sales before VAT) paid in addition to the 3% by the Group's small hydroelectric power station in favor of the Management Body.



FINANCIAL CAPITAL

€913.5 million Shareholder's Equity on Group level

€183.6 million Net borrowing



PRODUCTIVE CAPITAL

€220.1 million Property, Plant and Equipment

€265.5 million Intangible Assets and Concessions Rights



INTELLECTUAL CAPITAL

€2.5 million Investments in Digital Transformation

9 Participations in Research Project



HUMAN CAPITAL

7,329 Employees*

38,105 Training hours for Employees*



NATURAL CAPITAL

251,044 MWh Energy Consumption*

1,135.11 ML Water Consumption*



SOCIAL CAPITAL

92% Supplies from local suppliers*

80% Employees from local communities*

ELLAKTOR Group Business Model

VISION

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.

VALUES

Meritocracy and Equal Opportunities

Achievement and Efficiency

Integrity and Respect

Health and Safety

Collaboration and Excellence

Innovation and Best Practices

Encouragement and Advancement

MAIN OPERATIONS



KEY SUSTAINABLE DEVELOPMENT PRIORITIES

Innovation and Digital Transformation

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

Climate Change and the Circular Economy

- We contribute to the collective European goal of a successful and sustainable transition to a climate-neutral economy by recognizing the risks and opportunities of climate change and pursuing adaptation to its impacts.
• We incorporate the principles of the circular economy throughout our entire activity, by applying modern and innovative waste management methods.

Employee Health, Safety and Development

- We are committed to a healthy and safe working environment, aiming to eliminate accidents and occupational diseases for our employees and business partners.
• We invest in the well-being of our people and in the creation of a healthy working environment and create the right structures and conditions to promote their training, development and reward, offering equal opportunities and supporting diversity.

Social responsibility

- We operate responsibly in relation to the society in which we operate and contribute to social welfare through our business activity and social actions, responding with consistency, responsibility and transparency to the needs and expectations of both the local and wider society.

Integrity and Business Ethics

- We adopt best practices in business ethics, corporate governance and risk management.
• We encourage our partners to adopt responsible business practices.



FINANCIAL CAPITAL

€1,043.5 million Consolidated Revenue

€239.2 million EBITDA



PRODUCTIVE CAPITAL

35 RES projects in operation*

755 Highways under management*



INTELLECTUAL CAPITAL

€2.2 million Goodwill



HUMAN CAPITAL

€189.6 million Employee benefits

75% Employees on indefinite term contracts*



NATURAL CAPITAL

1,365 GWh Net electricity generated from Renewable Energy Sources*

957,585 tonnes of waste managed*



SOCIAL CAPITAL

€48.7 million Taxes paid

€192 million Subcontractor fees (including insurance contribution for subcontractor's employees)

€3.7 million investment in Society

*Refers to operations in Greece, Germany, Cyprus, Qatar, Romania and Jordan.



Sustainable Development

At ELLAKTOR Group, the active contribution and effective promotion of sustainable development are placed at the core of the operational planning and the activities of the business segments. Ensuring a safe and fair working environment, providing effective support for the economy, supporting local communities and reducing the environmental impact of its activities are key principles of the Group's business strategy and philosophy. These commitments, a key driver for the fulfillment of the Group's mission, are expressed through the modern infrastructure projects, that for decades have contributed to the improvement of people's quality of life and the development of local communities, as well as environmental projects that promote the circular economy and energy production through alternative and renewable sources, while creating added value for all Group's stakeholders.

Sustainable Development Strategy and Key Priorities

ELLAKTOR Group's business strategy focuses on strengthening its footprint in the Construction, Concessions, Environment, Real Estate Development and Services, and Green Energy Production segments. Focusing on the use of innovative practices and modern technologies, the Group aims to create sustainable, green and safe infrastructure projects for people and the environment and to produce alternative energy sources, in order to respond to the need for protection against climate change and the transition to green forms of energy.

The ESG Strategy & Sustainable Development Division operates at Group level, with the primary objective and responsibility, inter alia, to develop a sustainable development and social contribution investment strategy, as well as environmental and energy management for the Group and all its companies. Its main responsibilities also 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 acts as the hub for strategic planning and submission of proposals to the Sustainable De-

velopment Committee and the Board of Directors, regarding issues related to the environment, society and governance, it implements the ESG strategy action plan, in collaboration with the relevant divisions and business units, prepares the Group's Annual Sustainability Report and monitors sustainable development key performance indicators with the aim of their continuous improvement.

The reporting process regarding the performance of the Group's companies on Sustainable Development issues for 2022 was carried out in accordance with recognized international and national standards, such as GRI, SASB, the Athens Stock Exchange ESG Reporting Guide and Bloomberg GEI, through an electronic platform, with which key quantitative data on sustainable development issues at company, project/activity level, were collected. The Group aims to enhance transparency and continuously improve its performance on issues that fall within the recognized key strategic pillars of sustainable development.

The results of the materiality analysis (double materiality) carried out at the beginning of 2023 and presented in detail below, are in line with the Group's strategy, objectives and sustainable development priorities, set for both the Group and its companies.



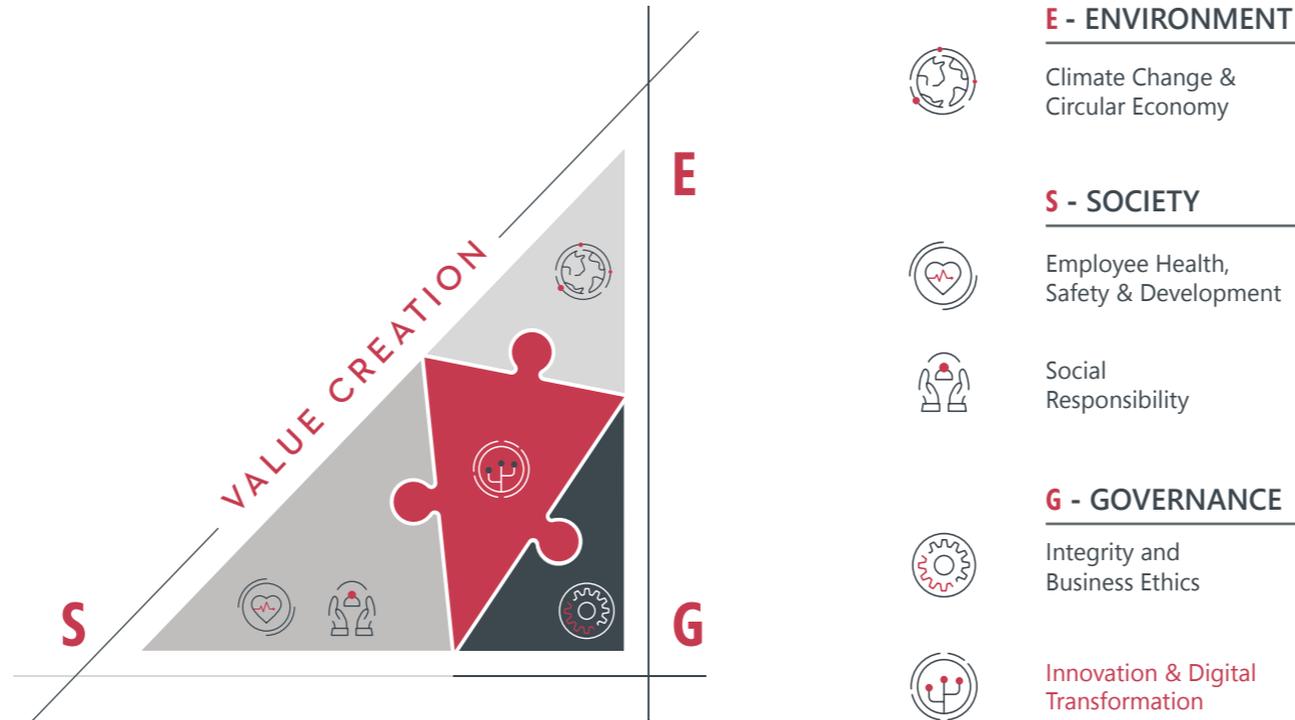
At ELLAKTOR Group, the active contribution and effective promotion of sustainable development are placed at the core of its operational planning and the activities of its business segments.



KEY STRATEGIC PILLARS

The key strategic pillars of Sustainable Development, identified at Group level, are Climate Change and the Circular Economy, Employee Health, Safety and Development, Social Responsibility, and Integrity and Business Ethics. Innovation and Digital Transformation are at the center of its strategy, acting as a connecting link to equip the Group with modern tools to address future challenges more effectively.

The strategic pillars for sustainable development:



Within the framework of the above strategic pillars, individual objectives have been set and a plan of short, medium and long-term actions has been designed to achieve them. The implementation of this plan has already been put in place and is systematically monitored by the ESG Strategy & Sustainable Development Division, the Strategic Development Division, the Sustainable Development Committee and the Group's Management.

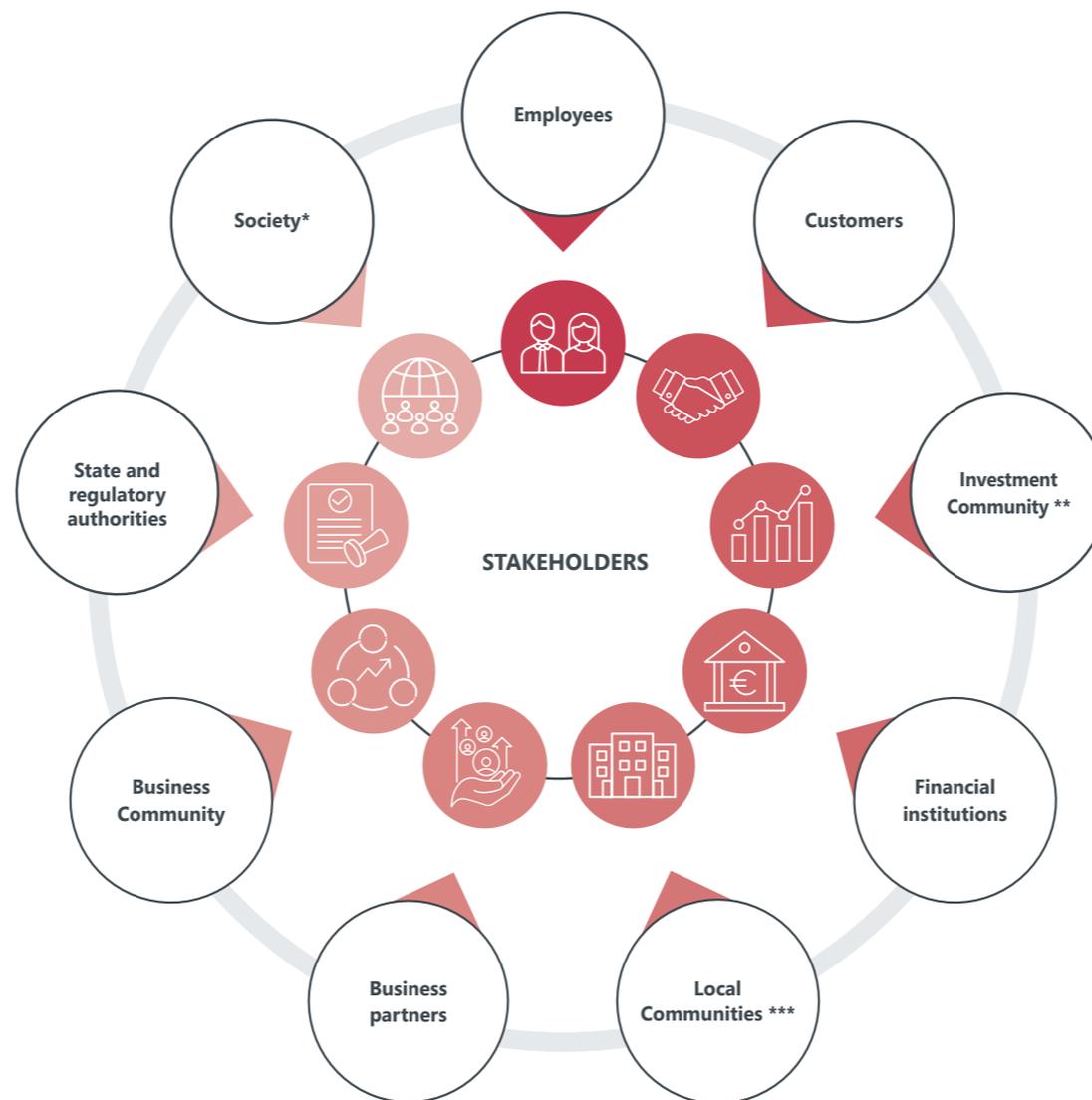
Sustainable Development Policy

ELLAKTOR Group promotes circular economy with innovative waste management solutions, while enhancing its footprint in green energy production. Following best international practices and recognized standards, the Group's sustainable development actions are fully aligned with its corporate values of Meritocracy & Equal opportunities, Collaboration & Excellence, Achievement & Efficiency, Innovation & Best Practices, Integrity & Respect, Encouragement & Development, Health & Safety.

In March 2022, the Group's revised [Sustainable Development Policy](#) was approved, which aims to establish the key principles that should govern the Group's sustainable development strategy, to ensure the integration of Environment, Society and Governance (ESG) factors into the Group's business activities, with a view to creating value for its stakeholders.

Communication with Stakeholders

For ELLAKTOR Group, 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 recognizes as its stakeholders those groups that affect and are affected, directly or indirectly, by its activity. Stakeholders belong either to the Group's internal environment (shareholders, employees), or to the external environment (business community, investment community, clients, financial institutions, local community and local government, business partners, government and regulatory authorities, society).



At ELLAKTOR Group, the key concern is to establish mutual trust and constructive cooperation with all stakeholders, respecting the expectations and needs of each group. In this context, the Group has established distinct channels of communication with each stakeholder group, as presented in the table in the [Annex](#). In addition, the Group invites its stakeholders to participate in surveys to assess of its sustainable development material topics, the results of which contribute to the formulation of the Group's strategy. More information on stakeholder engagement, the key needs and expectations of each stakeholder group, and Group's response, are presented in the [Annex](#).



At ELLAKTOR Group, our main concern is to establish mutual trust and constructive cooperation with all stakeholders.

* Media, Sustainable Development organizations, NGOs, civil society organizations

** Shareholders, investors and ESG rating agencies

*** Local government, local civil society organizations, local media

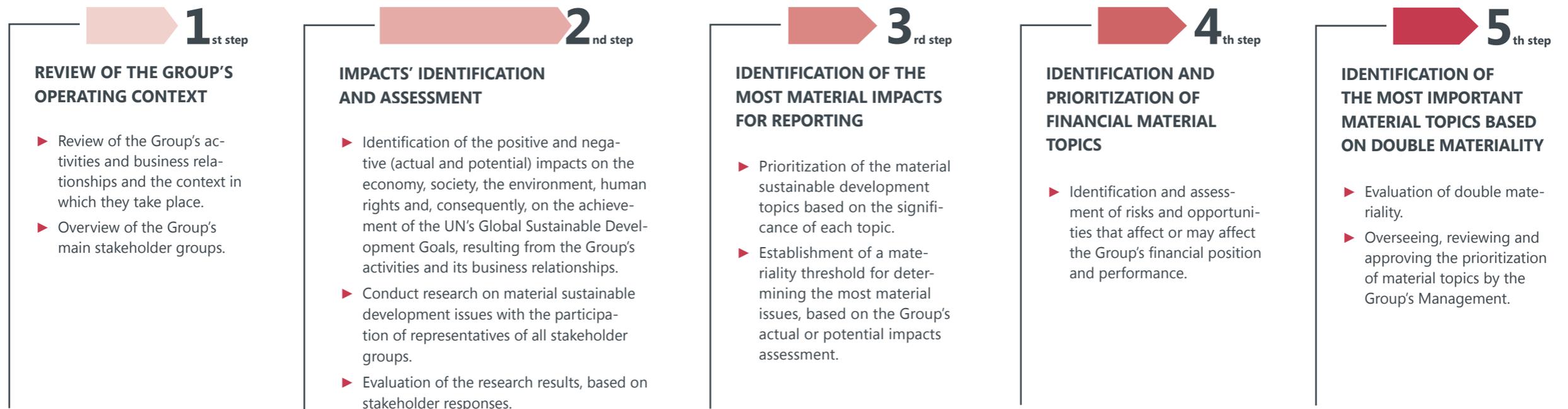
Materiality Analysis

ELLAKTOR Group carried out a materiality analysis, adopting for the first time the double materiality approach, in the context of the relevant survey it implements every two years, in accordance with its policy.

In this context, impacts resulting from the Group's activities that affect or may affect the environment, society, the economy and human rights, as well as the way in which the Group is or may be affected by ESG and sustainable development issues (risks and opportunities) were assessed.

The latest developments, trends and challenges in the wider socio-economic environment in which the Group operates were taken into account for this materiality analysis, as well as a number of international and sectoral sustainable development standards, initiatives and data sources, such as the GRI Standards 2021, the SASB reporting standards, the Athens Stock Exchange ESG Reporting Guide, the European Sustainability Reporting Standards (ESRS), etc.

The double materiality analysis for the year 2022 was carried out according to the following steps:



Further information regarding the methodology followed by the Group and the related results is presented below.

IMPACT MATERIALITY ANALYSIS

In assessing the impact materiality for the Group both the degree of each impact and its scope were taken into account, while for negative impacts the degree of irremediable character was also taken into account. In addition, with regard to potential impacts, the likelihood of their occurrence in the short and medium term was also taken into account.

The most significant positive and negative impacts of the Group’s operations are presented below.

RANKING OF SUSTAINABLE DEVELOPMENT TOPICS BASED ON IMPACT MATERIALITY

Positive impacts	Negative impacts
Economic value generation and distribution	Employees’ and business partners’ health, safety and well being
Energy transition and air emissions management	Business continuity and emergency preparedness
Employees’ and business partners’ health, safety and well-being	Circular economy and waste management
Employment practices, training and development	Care for the prosperity of local communities
Infrastructure safety and user experience	Equitable and inclusive working environment and human rights
Climate change	Climate change
Circular economy and waste management	Water and effluents management
Business continuity and emergency preparedness	Energy transition and air emissions management
Compliance, integrity and business ethics	Use of natural resources and raw materials
Care for the prosperity of local communities	Biodiversity and ecosystems protection and preservation
Equitable and inclusive working environment and human rights	Compliance, integrity and business ethics
Reinforcement of innovation, research and digital transformation	Infrastructure safety and user experience
Water and effluents management	
Promoting sustainability in the supply chain	
Use of natural resources and raw materials	
Biodiversity and ecosystems protection and preservation	

● Material topics ● Other topics





ANALYSIS OF FINANCIAL MATERIALITY

In 2022, ELLAKTOR Group strengthened the methodology for the materiality assessment, with the aim of harmonizing with the main International Standards (GRI Standards, ESRS, SASB, TCFD, etc.). In this context, the Group carried out an analysis of the financial materiality of sustainable development issues by identifying and assessing the most significant risks and opportunities in the short and medium term based on their potential impact on the Group’s financial performance.

The results based on the financial materiality analysis are presented below.

RANKING OF SUSTAINABLE DEVELOPMENT TOPICS BASED ON ECONOMIC MATERIALITY

Circular economy and waste management
Energy transition and air emissions management
Climate change
Compliance, integrity and business ethics
Care for the prosperity of local communities
Equitable and inclusive working environment and human rights
Employees’ and business partners’ health, safety and well-being
Use of natural resources and raw materials
Infrastructure safety and user experience
Promoting sustainability in the supply chain
Employment practices, training and development
Business continuity and emergency preparedness
Reinforcement of innovation, research and digital transformation
Water and effluents management
Biodiversity and ecosystems protection and preservation
Economic value generation and distribution

● Material topics ● Other topics

DOUBLE MATERIALITY ANALYSIS

In order to identify the most material issues of sustainable development, based on both the materiality of the impacts and their financial materiality for the Group, a double materiality analysis was carried out, based on which the results of these two processes were co-evaluated and recorded in a unified manner. The results were subsequently reviewed and approved by the Group’s Management, and are presented below.

RANKING OF SUSTAINABLE DEVELOPMENT TOPICS ON THE BASIS OF DOUBLE MATERIALITY

Employees’ and business partners’ health, safety and well-being
Energy transition and air emissions management
Climate change
Circular economy and waste management
Care for the prosperity of local communities
Equitable and inclusive working environment and human rights
Compliance, integrity and business ethics
Business continuity and emergency preparedness
Employment practices, training and development
Infrastructure safety and user experience
Use of natural resources and raw materials
Water and effluents management
Promoting sustainability in the supply chain
Reinforcement of innovation, research and digital transformation
Economic value generation and distribution
Biodiversity and ecosystems protection and preservation

● Material topics ● Other topics

CLASSIFICATION OF MATERIAL TOPICS

The topics subject to the materiality analysis carried out in early 2023 are classified into three categories: environmental issues (E), social issues (S) and governance topics (G).

The results of the double materiality analysis and of the impact materiality analysis, as well as of the financial materiality analysis are presented in the table below:

TYPE OF IMPACT

+ Positive **-** Negative

LEVEL OF MATERIALITY

Low Medium High

DOUBLE MATERIALITY ANALYSIS

Table of material issues and impacts

Material Topic	Main impact	Type of impact	Impact materiality level	Financial materiality level	Double materiality	
E 	Energy transition and air emissions management	Reducing dependence on non-renewable resources and critical raw materials, reducing greenhouse gas emissions, mitigating climate change and contributing to the achievement of the European climate neutrality target by 2050.	+			
		High energy transition costs, increase in greenhouse gases (GHG) and other air emissions, air pollution and global warming.	-			
	Circular economy and waste management	Preservation of products and materials, through extending their life cycle and increasing recycling and reuse rates, increasing their added value.	+			
		Resources use and potential impact on water recipient or soil.	-			
	Climate change	New opportunities' management regarding climate change mitigation and adaptation, such as investments in renewable energy, and the transition to a low-carbon economy.	+			
		Impacts due to improper or inadequate adaptation to climate change, such as adaptation costs, timely delivery of projects, disruption of supply chains, risks to the health and safety of employees and partners, etc.	-			
	Biodiversity and ecosystems protection and preservation	Integration of procedures and practices for biodiversity and ecosystems protection and preservation (e.g. reforestation, fauna and flora protection programs, based on approved assessments, etc.). Contributing to climate regulation.	+			
		Biodiversity loss and ecosystem degradation.	-			
	Water and effluents management	Implementation of water recycling and reuse practices, as well as rainwater harvesting and protection of soil, water bodies and resource conservation.	+			
		Use of natural resources, potential impact on the status of aquatic ecosystems and soil.	-			
	Use of natural resources and raw materials	Proper use of natural resources and raw materials in the projects under development and implementation of reduction and reuse practices, preserving the value of resources. Improving the efficiency of raw materials.	+			
		Depletion of natural resources and raw materials, increased greenhouse gas emissions, climate change.	-			

DOUBLE MATERIALITY ANALYSIS

Table of material issues and impacts

Material Topic	Main impact	Type of impact	Impact materiality level	Financial materiality level	Double materiality		
	Economic value generation and distribution	Economic value generated for the benefit of the Group, local communities and other stakeholders. Development and quality of quality of life improvement, supporting the economy, contributing to the creation of sustainable cities.	+	Low		Low	
		N/A	-				
	Employees' and business partners' health, safety and well-being	Providing a safe working environment that promotes employees' and business partners' health and well-being.	+	Low			Low
		Accidents and occupational diseases (including mental health) during work (employees and/or business partners).	-	Low	Low		Low
	Infrastructure safety and user experience	Ensuring user's health, safety and experience safer and greener transportation and development of a more sustainable urban environment.	+	Low			Low
		Potential infrastructure security incidents.	-	Low	Low		Low
	Equitable and inclusive working environment and human rights	Promoting a culture of equal opportunities for all, combating discrimination and supporting diversity and promoting employees' development and well-being.	+	Low			Low
		Lack of information on issues related to creating and supporting an equitable and inclusive working environment. Potential incidents of discrimination, unconscious bias, unequal opportunities, human rights violations.	-	Low	Low		Low
	Employment practices, training and development	Providing opportunities for personal and professional development and training for employees, enhancing their knowledge and skills.	+	Low			Low
		N/A	-		Low		Low
	Care for the prosperity of local communities	Contributing to the local communities' prosperity through social contribution programs, stakeholder engagement and impact management programs, providing employment opportunities and working with local suppliers.	+	Low			Low
		Potential disruption of trust and reputation, interruption or suspension of projects, nuisance.	-	Low	Low		Low

TYPE OF IMPACT

+ Positive - Negative

LEVEL OF MATERIALITY

Low Medium High

DOUBLE MATERIALITY ANALYSIS

Table of material issues and impacts

Material Topic	Main impact	Type of impact	Impact materiality level	Financial materiality level	Double materiality	
	Seamless operation and value creation for society through compliance with the applicable legal and regulatory framework.	+	Low			
	Possible incidents of poor compliance with laws and regulations by employees or business partners.	-	Low	Low	Low	
	Increasing the Group's efficiency in adapting to new requirements (environmental, technological, social), through participation in research projects, integration of new technologies and digital transformation and reducing operating costs.	+	Low			
	N/A	-		Low	Low	
	Implementation of policies and procedures to ensure critical functions and business continuity in the event of an emergency.	+	Low			
	Potentially ineffective emergency response (e.g. health and safety issues, environmental accidents, extreme weather events, pandemics, wars, etc.) and impacts on the smooth operation of the Group's activities.	-	Low	Low	Low	
	Promotion of responsible business and sustainable development across the supply chain, contribution to the development of sustainable cities and communities.	+	Low			
	N/A	-		Low	Low	
	Compliance, integrity and business ethics				Low	Low
	Business continuity and emergency preparedness				Low	Low

Compared to the previous year, and as a result of the revised methodology, the following changes in the material topics have occurred:

- ▶ Contribution in the improvement of the urban and built environment: It was integrated into other environmental topics.
- ▶ Reduction of noise emissions: Merged with the material issue "Care for the prosperity of local communities".
- ▶ Attracting investors that place emphasis in Group's performance on ESG (Environment, Society, Governance) issues: Re-

moved, in order to align with the requirements introduced under the new GRI Standards.

- ▶ Identifying financial and operational Climate Change impacts (risks and opportunities): The content of the topic was integrated into the material issue "Climate Change".

In addition, compared to the previous year, the topic "Equitable and inclusive working environment and human rights" has emerged as a material one.

TYPE OF IMPACT

+ Positive - Negative

LEVEL OF MATERIALITY

Low Medium High

ELLAKTOR Group's contribution to the Sustainable Development Goals

ELLAKTOR Group has adopted the United Nations 2030 Agenda, as expressed in the 17 Global Sustainable Development Goals (SDGs) for 2030.

The United Nations Sustainable Development Goals (SDGs) provide a holistic and integrated framework for addressing the world's most important sustainability challenges and creating a better future for all. Although governments are primarily responsible for prioritizing and implementing actions that meet the SDGs, achieving them also requires cooperation with businesses and civil society.

The Group's priority is to contribute to the achievement of the Goals that are directly linked to its activities and the challenges they face, as well as to the material topics arising from its operations.

The Group's contribution to the Sustainable Development Goals and Targets is presented below.

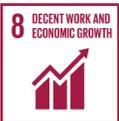
Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p> 1.2 Contribute to reducing the number of men, women and children living under all dimensions of poverty.</p> <p> 1.5 Contribute to reducing the exposure and vulnerability of the poor and those in vulnerable situations, to climate-related extreme events and other economic, social and environmental shocks and disasters.</p>	<p></p> <ul style="list-style-type: none"> Provided direct employment to 7,329 people. Provided access to the labor market to 48 young engineers through vocational training and internship programs.
	<p> 2.1 Contribute to ensuring that all people, especially the poor and people in vulnerable situations, have access to safe, nutritious and sufficient food all year round.</p> <p> 2.2 Contribute to reducing all forms of malnutrition and help address the nutritional needs of children and adolescents.</p>	<ul style="list-style-type: none"> Supported the Hope Boxes program of the non-profit Initiative Wise Greece, offering about 3 tonnes of essential food of high nutritional value. The beneficiaries of this action of the Group amounted to more than 690 children and 40 of our fellow human beings, through rations every month.

Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p>3.2 Contribute to reducing the deaths of newborns and children under the age of five.</p>  <p>3.6 Contribute to reducing the number of deaths and injuries from road traffic accidents.</p>  <p>3.9 Contribute to the prevention of deaths and illnesses caused by hazardous chemicals, pollution and contamination of air, water and soil.</p> 	<p>ELLAKTOR Group's contribution</p>  <ul style="list-style-type: none"> ▪ Trained employees of the Group's headquarters in CPR. ▪ Develop programs to educate and raise awareness of children and adults on road safety issues. ▪ The Group's companies apply certified Health and Safety Management Systems in their offices, construction sites and projects. ▪ Take preventive measures, in cases where potential risks are identified, with the aim of eliminating accidents and health incidents. ▪ Contribute to enhancing Health and Safety through the rational use of chemicals and through continuous training in accordance with their Safety Data Sheets (SDS). ▪ Conducted 5,950 Health and Safety training sessions for subcontractor employees. ▪ Collected 561 units of blood. ▪ Supported several organizations, such as the SOS Children's Villages, "Floga" Parents' Association of Children with Cancer, the Charity Association "Friends of the Child", the Organization "Greek Caravan of Solidarity" and the "Dynamai" center for speech, writing and communication rehabilitation, as well as the "Sotiria" General Hospital of Chest Diseases of Athens.
	<p>4.1 Contribute to ensuring that all girls and boys complete a free, equitable and quality primary and secondary education.</p>  <p>4.4 Contribute to the increase of the number of young people who have the relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship.</p>  <p>4.7 Contribute to ensuring that all learners acquire the knowledge and skills needed to promote sustainable development, including among others, through education for sustainable development and sustainable lifestyles, human rights and gender equality.</p>  <p>4.b Contribute to expanding the number of scholarships available to promote enrollment in higher education, including vocational training, information and communication technologies, technical, engineering and scientific programs.</p> 	<ul style="list-style-type: none"> ▪ Continuously strengthen our employee training programs, either through internal training programs or in cooperation with external bodies, in order to enhance their intellectual development. ▪ Completed, in cooperation with the Bodossaki Foundation, the Group's donation for the contribution to the "Experience Science" program, which resulted in addressing the critical shortage of 12 public low secondary schools in the country in necessary and modern laboratory equipment for teaching biology, physics and chemistry. ▪ Participate in the "ExcellenSeas" project with the aim of providing academic support to a student from the border island of Fourni. ▪ Donated a laptop and a projector to the 1st Primary School of Tagarades in the Municipality of Thermi, Thessaloniki, in order to meet the school's needs. ▪ Supported with 300 books, donated by the Group's employees, the newly established library of the 3rd Primary School of Magoula, Attica. ▪ Implement a monthly flashes tool on sustainable development issues to further raise employees' awareness.

Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p>5.1 Support an end to all forms of discrimination against women and girls.</p>  <p>5.2 Eliminate all forms of violence against women and girls, both in private and public life.</p>  <p>5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.</p> 	<p>ELLAKTOR Group's contribution</p> <ul style="list-style-type: none"> ▪ Implement a Diversity, Equity & Inclusion Policy. ▪ Signed the U.N. Women's Empowerment Principles (WEPs), a joint initiative of UN Global Compact and UN Women. ▪ Have adopted a Policy against Harassment and Violence at Work. ▪ Participate in the United Nations' Target Gender Equality program. ▪ Signed the Diversity Charter for Greek Businesses. ▪ Increased the percentage of female employees by 3 percentage points compared to 2020, at Group level.
	<p>6.1 Contribute to universal and equitable access to safe and affordable drinking water for all.</p>  <p>6.3 Contribute to improving water quality by reducing pollution, eliminating discharges, minimizing the release of hazardous chemicals and materials, halving the proportion of untreated wastewater, and significantly increasing recycling and safe reuse of water.</p>  <p>6.4 Contribute to increasing the efficiency of water use in all sectors and ensure the sustainable withdrawals and supply of freshwater in order to tackle water scarcity and substantially reduce the number of people suffering from water scarcity.</p>  <p>6.5 Contribute to the implementation of integrated water resources management.</p> 	<ul style="list-style-type: none"> ▪ Apply methods of reuse of treated water, rainwater harvesting, while at the same time, conduct frequent analyses on the quality of the wastewater produced by the waste treatment plants. ▪ Operate and maintain water treatment plants for the production of drinking water. ▪ Operate and maintain biological treatment plants for the treatment of wastewater. ▪ Carry out drinking water suitability measurements at our headquarters. ▪ Ensure equal access to sanitation facilities in our projects and facilities.





Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	 <p>7.2 Contribute to increasing the share of renewable energy in the energy mix.</p>	 <ul style="list-style-type: none"> Contribute to mitigating the effects of climate change and providing access to affordable and clean energy for all through our 1,365GWh production of clean electricity from renewable energy sources.
	<p>8.2 Contribute to achieving higher levels of economic productivity through diversification, technological upgrading and innovation, focusing on high- value added and labor-intensive sectors.</p> <p>8.5 Contribute to achieving full and productive employment and decent work for all, including young people and persons with disabilities, and to ensuring equal pay for work of equal value.</p> <p>8.6 Contribute to reducing the proportion of youth not in employment, education or training.</p> <p>8.7 Contribute to the elimination of forced labor, ending modern slavery and trafficking, ensuring the prohibition and elimination of the worst forms of child labor, and to ending all forms of child labor.</p> <p>8.8 Contribute to the protection of labor rights and the promotion of safe and secure working environments for all workers.</p>	<ul style="list-style-type: none"> Support the Greek economy and create value, part of which we distribute to society. Aim to create quality, low and/or highly skilled, full-time jobs with satisfactory wages, to provide equal opportunities to all employees, regardless of gender, age, nationality, beliefs and physical abilities, as well as to select employees on the basis of meritocratic and reliable methods. Focus on and implement new and innovative projects that contribute to the development and improvement of the quality of life. Implement a Human Rights Policy, which prohibits any form of forced labor, and do not employ children below the minimum age required by the laws of the countries where we operate. Through student employment programs, we are giving the opportunity for training, to those interested and creating permanent employment opportunities for young scientists. Participate in 8 research projects and implement a series of digital transformation projects, with a total investment of €2.5 million in 2022. Implement certified Health and Safety Management Systems in our offices, construction sites and projects implemented by Group companies. Conducted 5,950 Health and Safety training sessions for subcontractor employees.

Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p>9.1 Contribute to the creation of quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and human well-being, focusing on affordable and equitable access for all.</p> <p>9.5 Contribute to strengthening scientific research, encouraging innovation and substantially increasing the number of research and development workers.</p>	<p>ELLAKTOR Group's contribution</p> <ul style="list-style-type: none"> ▪ Create infrastructure projects that help achieve sustainable development and empower local communities. ▪ Invest in the development of modern technologies, taking advantage of the benefits offered by the internet, digital media and new technologies. ▪ Participate in 8 research projects, both to optimize the Group's operation and to modernize its projects.
	<p>10.2 Contribute to the empowerment and promotion of social, economic and political inclusion of all, regardless of age, gender, disability, race, nationality, origin, religion or economic or other status.</p> <p>10.3 Contribute to ensuring equitable opportunities and reducing the effects of inequalities, by promoting appropriate legislation, policies and actions in this regard.</p>	<ul style="list-style-type: none"> ▪ Implementation of Diversity, Equity & Inclusion Policy. ▪ Signed the U.N. Women's Empowerment Principles (WEPs), a joint initiative of UN Global Compact and UN Women. ▪ 16% of the Group's employees have a different nationality from that of the country in which they are employed.



Sustainable Development Goals

Targets directly or indirectly related to the Group's activities

ELLAKTOR Group's contribution



11.2 Contribute to the provision of safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably through the expansion of public transport.



11.4 Contribute to the protection and preservation of the world's cultural and natural heritage.



11.5 Contribute to reducing the number of deaths and the number of people affected by natural disasters, as well as direct economic losses.



11.6 Contribute to reducing the negative per capita environmental impact of cities, paying particular attention to air quality and the management of urban and other waste.



11.7 Contribute to providing universal access to safe, inclusive and accessible green and public spaces, especially for women and children, older people and people with disabilities.

- Contribute to the implementation and operation of projects that help increase the well-being of urban residents and create a more **friendly and sustainable urban environment**.
- **Recognize the importance of historical and cultural heritage** and the opportunity that projects offer, for the uncovering of archaeological finds and we implement procedures and measures in accordance with the legislation, with the supervision of professional archaeologists and archaeological authorities in the case of archaeological finds.
- **Analyze and assess potential risks from the Group and projects operation** and **take measures** to mitigate risks, deal with emergencies and ensure the proper functioning of the cities.
- Promote the **creation of safe, resilient projects**, taking into account the impacts of climate change and potential natural disasters.
- Through the Smart Park we offer visitors a **safe outdoor walk**, free of cars and motorcycles, while we have taken into account the needs of people with disabilities (certification of public spaces according to the requirements – recommendations of the ELOT 1439:2013 standard).
- Through the subsidiary company of the Group, TOMI S.A., **we contribute substantially to the development and upgrading of the urban environment**, both at national and local level, contributing to the improvement of the micro-climate, the redevelopment of streets and parks in local districts that are a pole of attraction for citizens and visitors.
- Use our experience and resources to **support cultural activities** (such as restoration/preservation of buildings of cultural interest and archaeological works).





Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p>12.2 Contribute to the achievement of sustainable management and efficient use of natural resources.</p> <p>12.4 Contribute to the proper management of chemicals and all waste in accordance with internationally agreed frameworks.</p> <p>12.5 Contribute to reducing waste generation through prevention, reduction, recycling and reuse.</p> <p>12.6 Contribute to the encouragement of companies to adopt sustainable practices and integrate sustainability information into their reports.</p>	 <ul style="list-style-type: none"> Contributed to the avoidance of 1,266 th. tonnes of CO₂ eq. (third-parties). Implement Policies and Environmental Management Systems to comply with the legal framework regarding the chemicals' management, in accordance with their Safety Data Sheets and manage waste in accordance with the applicable environmental legislation. Strengthen circular economy practices through our activity in the Environment segment, with waste management, the separation and utilization of recyclable materials, the production of alternative fuels and the energy recovery of biogas. Managed 957,585 tonnes of solid waste and 297,372,348 m³ of wastewater from all Group activities, contributing to circular economy and the protection of biodiversity. Publish annually a Sustainability Report.
	<p>13.1 Contribute to strengthening resilience and adaptive capacity to climate-related risks and natural disasters.</p> <p>13.3 Contribute to the improvement of education, awareness, and human and institutional capacity on issues related to climate change mitigation, adaptation, impact reduction and early warning.</p>	<ul style="list-style-type: none"> Reduce the energy consumption from non-renewable sources for the Group's operation. Reduced energy consumption by 12% compared to 2021. Started planning the Roadmap towards zero greenhouse gas emissions by 2050. Are in the process of identifying and analyzing climate risks and their potential financial impacts in alignment with the recommendations of the TCFD (Task Force on Climate – related Financial Disclosures), in order to design the Climate Risk Management Plan.

Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p>14.1 Contribute to the prevention and reduction of all forms of marine pollution, in particular pollution from land-based activities, including marine litter.</p> <p>14.2 Contribute to the sustainable management and protection of marine and coastal ecosystems to avoid adverse impacts by enhancing their resilience.</p>	<p>ELLAKTOR Group's contribution</p> <ul style="list-style-type: none"> Contribute to the protection of the biodiversity of the Saronic Gulf through the operation and maintenance of the Psytalia Wastewater Treatment Plant. Take all necessary measures to prevent and deter any form of marine pollution for all our projects. Cooperate with NGOs and institutions, supporting a series of environmental actions, aimed at cleaning the seabed, contributing to the protection of marine and coastal ecosystems. On the occasion of World Environment Day, we carried out an information and awareness-raising campaign for employees at our headquarters, on the reduction and proper management of waste and the reduction of plastic pollution.
	<p>15.1 Help to ensure the conservation, restoration and sustainable use of ecosystems and biodiversity.</p> <p>15.2 Contribute to promoting the implementation of sustainable management of all types of forests.</p> <p>15.4 Contribute to the conservation of mountain ecosystems, including their biodiversity.</p> <p>15.5 Contribute to taking action to reduce the degradation of natural habitats, prevent the loss of biodiversity and protect and prevent the extinction of threatened species.</p>	<ul style="list-style-type: none"> Undertake initiatives aimed at protecting biodiversity, in compliance with legislation and environmental requirements, as well as the environmental management processes applied to projects related to areas of high environmental value. Take into account the specific environmental requirements of the projects or activities located in areas adjacent to environmentally sensitive areas and monitor protected species (flora and fauna). Are a member of the "Environmental Alliance" founded by the non-profit Environmental Organization We4All and we carried out the first symbolic tree planting with the voluntary participation of our employees.





Sustainable Development Goals	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution
	<p>16.1 Contribute to the reduction of all forms of violence and related death rates.</p> <p>16.2 Contribute to ending the abuse and exploitation of human beings and all forms of violence suffered by children.</p> <p>16.3 Contribute to the promotion of the rule of law, nationally and internationally, and to ensuring equal access to justice for all.</p> <p>16.5 Contribute to reducing all forms of corruption and bribery.</p> <p>16.6 Contribute to the development of effective, accountable and transparent institutions at all levels.</p> <p>16.7 Help ensure responsible, inclusive, participatory and representative decision-making at all levels.</p> <p>16.b Promote and implement non-discriminatory practices and adopt sustainable development policies.</p>	<ul style="list-style-type: none"> ▪ Implement an Integrity Compliance Management System. ▪ Apply a Diversity, Equity & Inclusion Policy. ▪ Adopt a Policy against Harassment and Violence at Work.
	<p>17.16 Contribute in the strengthening of the Global Partnership for Sustainable Development, complemented by multilateral partnerships that mobilize and share knowledge, expertise, technology and financial resources to support the achievement of the Sustainable Development Goals in all countries.</p> <p>17.17 Aim for corporate collaborations and effective partnerships between the public and private sector and with civil society.</p>	<ul style="list-style-type: none"> ▪ We are an active member of many organizations and networks (SEV Council for Sustainable Development, Hellenic Network for Corporate Social Responsibility – CSR Hellas) with which we cooperate to support actions that promote the achievement of the Sustainable Development Goals.





Group ESG strategy

ELLAKTOR Group plans and implements its actions in accordance with the ESG strategy objectives it has set, in full alignment with the principles set out in the [Group's Sustainable Development Policy](#).

In 2022, the Group started implementing the action plan of the strategic priorities and targets set in 2021. The new ESG Strategy is systematically monitored by the Group's Strategic Development Division and the ESG Strategy & Sustainable Development Division in cooperation with the Heads of the relevant Divisions and the Sustainable Development Committee is informed on the progress of this strategy.

The following are the Group's strategic priorities, the action plan and their progress.

CLIMATE CHANGE AND CIRCULAR ECONOMY

Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable Development Goals
				Base year	2022	
Greenhouse gas emissions reduction	Energy transition and air emissions management Climate change	<ul style="list-style-type: none"> Reduction of direct emissions intensity (Scope 1) 10%* (medium-term) Reduction of indirect emissions intensity (Scope 2) 20%* (medium-term) 2050 zero greenhouse gas emissions (long-term) <p><i>* potential rate adjustment according to the results of the roadmap.</i></p>	 	2020	 	
Contribution to circular economy	Energy transition and air emissions management Circular economy and waste management Water and effluents management Natural resources and raw materials use	<ul style="list-style-type: none"> 80% waste diverted* from landfill (short-term) 90% waste diverted* from landfill (medium-term) Achievement of zero waste* to landfill from the Group's projects by 2028 (long-term) <p><i>* Waste resulting from the operation of the Group's projects</i></p>	 	2021	 	
Managing Climate Risks	Energy transition and air emissions management	<ul style="list-style-type: none"> Identification and mitigation of climate risks (short-term) 		2021		
Protection and conservation of biodiversity	Protect and conserve biodiversity and ecosystems	<ul style="list-style-type: none"> Implementation of biodiversity conservation management plans in 100% of projects, within or near environmentally sensitive areas (medium-term) 		2022	New Target	

Short-term targets (1-3 years)

Medium-term targets (4-7 years)

Long-term targets (8-10 years)

EMPLOYEE HEALTH, SAFETY AND DEVELOPMENT

Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable Development Goals
				Base year	2022	
Strengthening Health & Safety culture to achieve zero accidents	Employees' and business partners' health, safety and well-being	<ul style="list-style-type: none"> 10 hours of average H&S training per employee (short-term) 		2021		3 GOOD HEALTH AND WELL-BEING
		<ul style="list-style-type: none"> 20 hours of average H&S training per employee (medium-term) 		2021		
		<ul style="list-style-type: none"> Zero fatal and high-consequence work-related injuries (short-term) 		2022	New Target	
Well-being	Employment practices, training and development	<ul style="list-style-type: none"> Enhancing employees' engagement (medium-term) 		2022	New Target	3 GOOD HEALTH AND WELL-BEING
		<ul style="list-style-type: none"> Participation of 100% of employees in well-being programs (long-term) 		2022	New Target	
Enhancing diversity	Equitable and inclusive working environment and human rights	<ul style="list-style-type: none"> Zeroing the pay gap for the same Grade (medium-term) 		2021		4 QUALITY EDUCATION 5 GENDER EQUALITY 10 REDUCED INEQUALITIES 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Training & Evaluation	Employment practices, training and development	<ul style="list-style-type: none"> 20 hours average training per employee (short-term) Training of all employees in key thematic areas (short-term) Maintaining an average of over 25 hours of training per employee (medium-term) 	 	2021 2021 2021	 	4 QUALITY EDUCATION

Short-term targets (1-3 years)
 Medium-term targets (4-7 years)
 Long-term targets (8-10 years)



SOCIAL RESPONSIBILITY

Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable Development Goals
				Base year	2022	
 Strengthening society and improving the response to its needs and expectations	Economic value generation and distribution Care for the prosperity of local communities	<ul style="list-style-type: none"> Stakeholder satisfaction survey (short-term) 		2022	New Target	 
		<ul style="list-style-type: none"> Consultation with local community on 100% of projects (long-term) 		2022	New Target	
 Strengthening volunteering	Care for the prosperity of local communities	<ul style="list-style-type: none"> Participation of 100% of employees* in Group's voluntary actions (medium-term) <p><i>* The indicator refers to employees who expressed their intention to participate in volunteering activities through relevant survey</i></p>		2022	New Target	 
 Constructive collaboration with stakeholders	Care for the prosperity of local communities	<ul style="list-style-type: none"> Enhancing stakeholder engagement (short-term) 		2021		
 Ensuring projects' quality and safety	Infrastructure safety and user experience	<ul style="list-style-type: none"> Continuous decrease in the percentage of reworks in relation to turnover (short-term) 		2021		 
		<ul style="list-style-type: none"> Zero non-compliances regarding quality issues (long-term) 		2021		

 Short-term targets (1-3 years)

 Medium-term targets (4-7 years)

 Long-term targets (8-10 years)



INTEGRITY AND BUSINESS ETHICS

Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable Development Goals
				Base year	2022	
 Improving the ESG performance of business partners with emphasis on the supply chain	Promoting sustainability in the supply chain	<ul style="list-style-type: none"> Cooperation only with business partners that meet the ESG criteria set by the Group (medium-term) 		2022	New Target	
 Strengthening the Anti-Bribery System	Compliance, integrity and business ethics	<ul style="list-style-type: none"> Zero confirmed cases of bribery (short-term) 		2022	New Target	
 Strengthening the Group's Integrity Framework and shielding processes to maintain zero confirmed incidents of corruption	Compliance, integrity and business ethics	<ul style="list-style-type: none"> Zero confirmed incidents of corruption (short-term) 		2022	New Target	
 Optimal Corporate Governance	Compliance, integrity and business ethics Business continuity and emergency preparedness	<ul style="list-style-type: none"> Certification of Corporate Governance System according to ISO/IEC 37000:2021 (short-term) 		2021		
		<ul style="list-style-type: none"> Business Continuity Management System Certification according to ISO 22301:2019 (short-term) 		2022	New Target	


INNOVATION AND DIGITAL TRANSFORMATION

 Digital Transformation	Reinforcement of innovation, research and digital transformation	<ul style="list-style-type: none"> Exploiting innovative technological practices and opportunities 		2022	New Target	 
 Operations' optimization and development of products and services	Reinforcement of innovation, research and digital transformation	<ul style="list-style-type: none"> Participation in at least 5 proposals per year for funded research projects 		2022	New Target	 

 Short-term targets (1-3 years)

 Medium-term targets (4-7 years)

 Long-term targets (8-10 years)

Memberships in Associations and Networks

The Group and/or its companies participate in the following national and international associations, organizations and bodies, aiming at the development of the sectors in which they operate, constantly improving the services provided, exchanging know-how and best practices, as well as managing, in the best possible way, the impact from their operation. Further information regarding the organizations and bodies in which the Group participates is provided in the [Annex](#).



Hellenic Federation of Enterprises (SEV)



SEV Business Council for Sustainable Development



Hellenic Network for Corporate Social Responsibility - CSR Hellas



United Nations Global Compact (UNGC)



United Nations Global Compact Network Greece



Hellenic Association of Toll Road Network - HELLASTRON



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



Panhellenic Association of Environmental Protection Companies (PASEPPE)



Hellenic Wind Energy Association (HWEA)

Performance in ESG rating agencies

ELLAKTOR Group responds to the questions of sustainable development analysts and its performance is evaluated by independent organizations such as ISS ESG, Bloomberg, S&P, Refinitiv, Sustainable Fitch, FTSE Russell, MSCI ESG and Sustainalytics. In addition, the Company is included in the [ATHEX ESG](#) index. This index tracks the stock market performance of listed companies that adopt and promote their environmental, social and governance (ESG) practices.

ELLAKTOR was included for the first time in the "Financial Times Stock Exchange4Good (FTSE4Good) Index Series". The FTSE4Good indices were created by FTSE Russell and assess the performance of companies in terms of the implementation

of practices in the areas of Environment, Society and Governance (ESG). The FTSE4Good indices are used by the financial and investment market to evaluate socially responsible investment opportunities and other business products. FTSE Russell's assessment is based on the performance of listed companies in the areas of Corporate Governance, Health and Safety, Anti-Corruption and Climate Change. Companies included in this FTSE4Good index meet multiple Environmental, Social and Corporate Governance criteria and requirements.

Finally, ELLAKTOR participated for the first time in the Bloomberg Gender Equality Index (GEI), achieving a score higher than the inclusion threshold.

ESG PERFORMANCE

Rating agency	Rating		Rating Scale (low-high)	Rating change 2021-2022
	2022	2021		
ISS ESG	Environment: 2 Social: 2 Governance: 4	Environment: 3 Social: 2 Governance: 5	10 - 1	▲
Bloomberg	69.9	67	0 - 100	▲
REFINITIV	80	80 (A-)	0 - 100	▲
SUSTAINALYTICS	29.8	37.3	100 - 0	▲
Corporate Knights	57.25	31.35	0 - 100	▲
S&P Global	40	30	0 - 100	▲

Disclosures according to EU Taxonomy

The European Union adopted the EU Taxonomy Regulation (2020/852) with the focus on creating a common system for the identification and taxonomy of environmentally sustainable economic activities. In this context, guidelines are provided for assessing a wide range of activities by reviewing their environmental performance, with a view to mobilizing green investments and achieving the goal of a climate-neutral economy in the EU by 2050, in line with the European Green Deal.

ELLAKTOR Group carried out for the second year an assessment, in accordance with the Taxonomy Regulation, in order to identify the Group's environmentally sustainable business activities and related economic performance, based on the technical criteria of the Regulation. The assessment took into account available technical data, as well as estimates and existing assessments for the whole life cycle of the products and services provided for all the activities of the Group's subsidiaries.

Specifically, it has proceeded to the screening of environmentally sustainable activities, as well as the provisions of the Climate Delegated Act and the Complementary Climate Delegated Act, by adopting a five-step assessment methodology as follows:

TAXONOMY ELIGIBILITY SCREENING

According to the Regulation, in order to check eligibility, the contribution of each activity to the achievement of one or more of the following six environmental objectives is assessed:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources

4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems.

In this context, ELLAKTOR Group has applied the basis of the Taxonomy Regulation and the Climate Delegated Act (EU) 2021/2139 and recorded in the table below the economic activities that are identified as eligible with regard to the definition of eligibility under the Taxonomy Regulation.

METHODOLOGY FOR EVALUATING THE GROUP'S BUSINESS ACTIVITIES



EUROPEAN TAXONOMY

Article 8, Regulation (EU) 2020/852

Eligible Activities

CONSTRUCTION

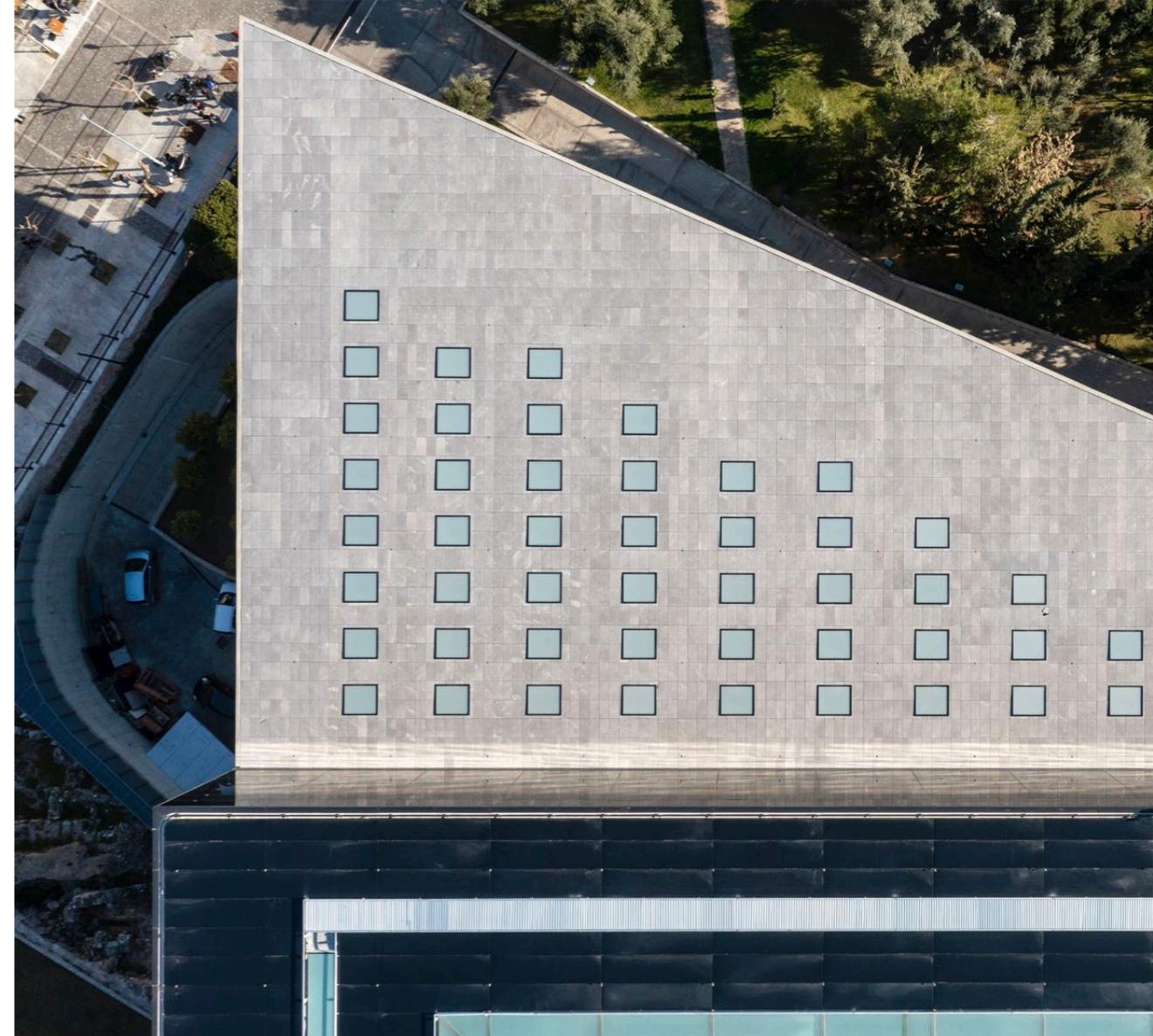
- ▶ Forestry conservation
- ▶ Electricity generation from hydropower
- ▶ Construction, extension and operation of water collection, treatment and supply systems
- ▶ Construction, extension and operation of wastewater collection and treatment
- ▶ Renewal of waste water collection and treatment systems
- ▶ Infrastructure for rail transport
- ▶ Infrastructure enabling low-carbon road transport and public transport
- ▶ Infrastructure enabling low carbon water transport
- ▶ Construction of new buildings
- ▶ Renovation of existing buildings
- ▶ Installation, maintenance and repair of energy efficiency equipment

CONCESSIONS

- ▶ Infrastructure enabling low-carbon road transport and public transport

ENVIRONMENT

- ▶ Electricity generation from wind power
- ▶ Landfill gas capture and utilization
- ▶ Material recovery from non-hazardous waste





TAXONOMY ALIGNMENT SCREENING

As part of the Taxonomy alignment screening, the eligible activities identified in the previous stage were assessed against the criteria of significant contribution to climate change mitigation and adaptation to climate change.

Specifically, according to the Climate Delegated Act, an economic activity is classified as being in compliance with Taxonomy if it meets the following requirements:

It contributes significantly to one or more environmental objectives

In this context, eligible economic activities were assessed on the basis of technical screening criteria for their significant contribution to the first two environmental objectives - climate change mitigation and adaptation to climate change, as set out in Annexes I and II of the Climate Delegated Act.

Does no significant harm (DNSH) to any of the other five environmental objectives

According to Article 17 of the Regulation, with regard to the criteria of no significant harm on the other environmental objectives, the environmental impacts of the activity itself and the environmental impacts of the products and services resulting from the activity over their entire life cycle are taken into

account. In particular, in the context of the assessment of harm for the other environmental objectives, the following were considered:

Environmental Objective	Framework for the assessment of significant harm
Climate change mitigation	Checking of potentially significant greenhouse gas emissions.
Climate change adaptation	Checking that actual and expected climate conditions do not cause increased negative impacts on the activity itself or on people, natural resources or assets.
Sustainable use and protection of water and marine resources	Control of no significant impact on the ecological potential of water bodies and marine waters.
Transition to a circular economy	Checking that no high volumes of waste are generated and not properly managed.
Pollution prevention and control	Control of emissions of pollutants into the air, water or soil, compared to the situation before the activity started.
Protection and restoration of biodiversity and ecosystems	Checking that ecosystem resilience is not compromised and that no significant harm is made on habitat and species conservation.

Further information on the criteria for not causing a significant harm on the environmental objective «adaptation to climate change» is provided in the [Environment](#) section.

Meets the minimum social safeguards

In line with the guidelines of the Regulation and the Climate Delegated Act, the conduct of activities in accordance with minimum safeguards was assessed, with a focus on ensuring respect for human rights and good business conduct. In this context, the protection of human rights was assessed, as well as the safeguarding of business ethics, including the prevention of corruption and bribery, and ensuring fair competition and compliance with tax obligations. Since 2019, ELLAKTOR Group has been applying and adhering to the principles of the United Nations Global Compact in the conduct of its business activities and in its dealings with stakeholders, with the aim of operating responsibly, and since then it has been disclosing its performance on an annual basis. In addition, it has developed and implements a Code of Ethics and a Code of Conduct for Business Partners.



EUROPEAN TAXONOMY

Climate Delegated Act and Complementary Climate Delegated Act (Regulation (EU) 2021/2139, Regulation (EU) 2021/2178)

Aligned Activities

CONSTRUCTION

- ▶ Forestry conservation
- ▶ Electricity generation using solar photovoltaic technology
- ▶ Construction, extension and operation of water collection, treatment and supply systems
- ▶ Construction, extension and operation of wastewater collection and treatment
- ▶ Infrastructure for rail transport
- ▶ Construction of new buildings
- ▶ Renovation of existing buildings
- ▶ Installation, maintenance and repair of energy efficiency equipment

ENVIRONMENT

- ▶ Electricity generation from wind power
- ▶ Landfill gas capture and utilization
- ▶ Material recovery from non-hazardous waste

CALCULATION AND RECORDING OF FINANCIAL KPIS

To calculate the degree to which an activity is considered sustainable, the following measurement methods have been taken into consideration, which are referred to in Regulation (EU) 2021/2178 as Key Performance Indicators (KPIs). In particular, the percentages of the annual turnover from sales of products and services, capital expenditure (CapEx) and operating expenditure (OpEx) are presented, which correspond to the Group's economic activities that were considered non-eligible, eligible or aligned for EU Taxonomy Regulation purposes, according to the description of these activities and taking into account the corresponding NACE codes, as well as the relevant technical screening criteria as listed in Delegated Regulations (EU) 2021/2139 and (EU) 2022/1214. The Group's economic activities were assessed and included/excluded on the basis of both eligibility and their alignment with the technical screening criteria provided in the relevant delegated regulations. This assessment is presented in detail for each aligned activity, while the activities found not meeting one or more of the technical criteria are presented on the basis of eligibility in this report.

ELLAKTOR Group used the three following KPIs that are disclosed regarding the proportion of the Taxonomy-eligible and Taxonomy-aligned activities, in order to calculate the respective amounts.

Percentage of Turnover

The percentage of sales under the Complementary Climate Delegated Act is calculated as the part of the net turnover derived from products or services associated with Taxonomy-aligned economic activities (numerator), divided by the net turnover amount of the Group (denominator). The denominator has been based on consolidated sales in accordance with International Accounting Standard (IAS) 1.82 (a). Specifically, the Group's total sales are reflected in "Sales" in the Group's Income Statement of the Annual Financial Statements (Consolidated and Corporate).

The "% of turnover aligned in 2022" column shows the ratio of sales from Taxonomy-aligned activities to total sales from Taxonomy-eligible activities.

Percentage of annual capital expenditure

The percentage of capital expenditure (CapEx) was calculated based on additions to tangible and intangible assets during 2022 before depreciation and any revaluations, including those resulting from revaluations and impairments for 2022 and excluding fair value changes, as well as any possible additions to tangible and intangible assets resulting from business combinations (denominator).

The numerator is equal to the part of the capital expenditure included in the denominator and is any of the following, as defined in Regulation (EU) 2021/2178:

1. related to assets or processes associated with Taxonomy-aligned economic activities
2. part of a plan to expand taxonomy-aligned economic activities or to enable the alignment of taxonomy-eligible economic activities ('capital expenditure plan') under the following conditions: (a) the plan is intended either to expand the firm's Taxonomy-aligned economic activities or to upgrade the Taxonomy-eligible economic activities to become Taxonomy-aligned within a period of five years; and (b) the plan is disclosed at the aggregate level of economic activity and

approved by the management body of non-financial undertakings

3. related to the purchase of products from taxonomy-aligned economic activities and individual measures that enable the targeted activities to become low-carbon or lead to reductions in greenhouse gas emissions.

Total capital expenditure is recorded under "Purchase of tangible and intangible fixed assets and investments in real estate" in the Group's Cash Flow Statement, in the Annual Financial Statements (Consolidated and Corporate).

The "% of capital expenditure aligned in 2022" column shows the ratio of capital expenditure from Taxonomy-aligned activities to total capital expenditure from Taxonomy-eligible activities.

Percentage over annual operating expenditure

The percentage of annual operating expenditure (OpEx) was calculated on the basis of the direct non-capitalized costs associated with research and development, building renovation measures, short-term leasing, maintenance and repair, and any other direct costs associated with the day-to-day maintenance of tangible fixed assets by the company or a third party to whom the activities necessary to ensure the continuous and efficient operation of these assets are outsourced (denominator). The numerator equals to the part of the operating expenditure included in the denominator that is any of the following:





1. related to assets or processes associated with Taxonomy-aligned economic activities, including training and other human resources adaptation needs, and direct non-capitalized costs that represent research and development;
2. part of the CapExplan to expand Taxonomy-aligned economic activities or allow Taxonomy-eligible economic activities to become Taxonomy-aligned within a pre-defined timeframe;
3. related to the purchase of output from Taxonomy-aligned economic activities and to individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions, provided that these measures are implemented and put into operation within 18 months.

The relevant expenses for the Group are included in the lines "Cost of goods sold", "Administrative expenses" and "Distribution expenses" in the Group Income Statement in the Annual Financial Statements (Consolidated and Corporate). More specifically, it is reflected in the line "Expenses for repair and maintenance of property, plant and equipment" in note 31 "Expenses per category" of

the Annual Financial Statements (Consolidated and Corporate) as of 31 December 2022.

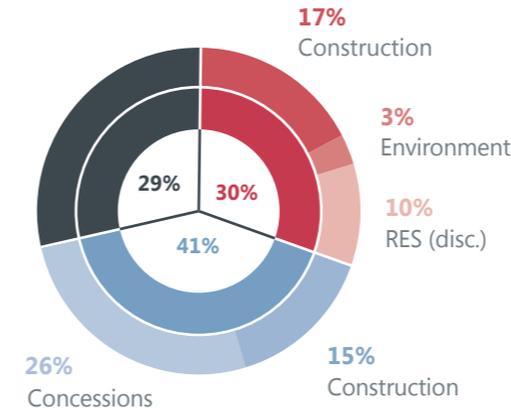
The "% of operating expenditure aligned in 2022" column shows the ratio of operating expenditure from Taxonomy-aligned activities to total operating expenditure from Taxonomy-eligible activities.

The relevant tables set out in the [Annex](#) show the percentages of eligible and non-eligible activities, including both aligned and non-aligned activities, according to the Taxonomy, by Turnover, Operating Expenditure and Capital Expenditure.

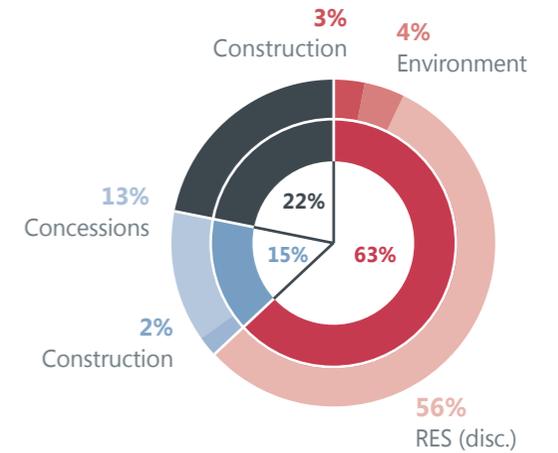
In particular, the tables present separately the information relating to the Renewable Energy segment as in the context of the implementation of the transaction for the transfer of the Renewable Energy segment to ANEMOS RES HOLDINGS S.A. on 14.12.2022, the Renewable Energy Sources segment (RES) has been classified as Discontinued Activities, in accordance with the provisions of IFRS 5 (note 6).

EU Taxonomy-2022

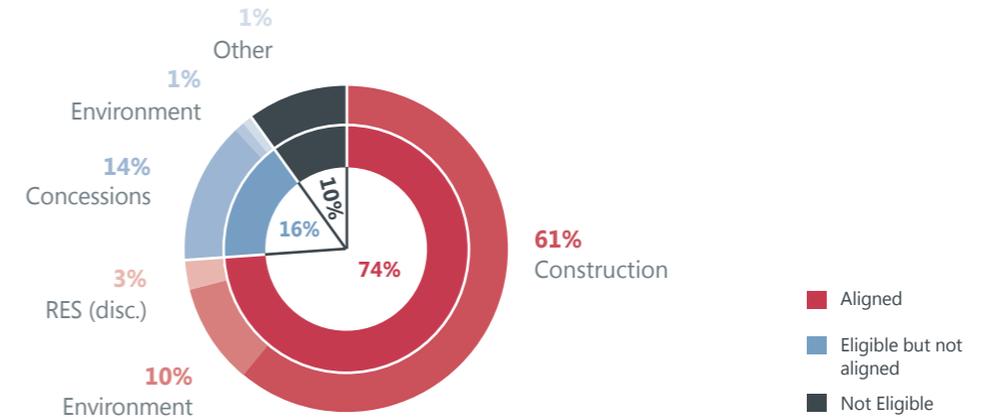
% Turnover



% Operating expenditure (OpEx)



% Capital expenditure (CapEx)





ENVIRONMENT

ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS



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ALIGNMENT WITH THE PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT





Main achievements



New Group Environmental & Energy Policy



Initiated the Roadmap to Net Zero Greenhouse Gas Emissions by 2050



In the process of identifying and evaluating climate risks and their potential economic impacts in line with the TCFD recommendations

Material Topics

Energy transition and air emissions management

Biodiversity and ecosystems protection and preservation

Circular economy and waste management

Use of natural resources and raw materials

Climate change

Water and effluents management

Our performance

1,266 th. tonnes

avoidance of third-party CO₂ eq. emissions

33%

reduction in the intensity of direct and indirect CO₂ eq. emissions compared to 2021

89%

of waste diverted from disposal, from the Group's operation

8,172

hours of environmental and energy training

112,512 m²

of protected habitat area

958 th. tonnes

of solid &

298 mil. m³

of third-party wastewater managed at the treatment plants

Environmental Management

ELLAKTOR Group, recognizing its impact on the environment, has set as a goal and priority the effective environmental management and the reduction of any burden from its business activities, applying best available practices and techniques, developing strategies for the continuous improvement of its environmental performance and focusing on the development of a responsible corporate culture for the environment and energy.

Environmental protection, pollution prevention, promotion of the circular economy, achieving zero greenhouse gas emissions, addressing the risks of climate change, preservation of biodiversity and the protection of ecosystems are key priorities of the Group in all its activities, in order not only to mitigate its environmental impacts, but also to enhance its positive impact on the environment.

ENVIRONMENTAL & ENERGY POLICY

The Group has adopted an [Environmental & Energy Policy](#) and is committed to continuous compliance with applicable legislation and any other requirements, to protect the environment, including pollution prevention, to ensure the provision of the required information and resources, to achieve the objectives of the implemented Environmental & Energy Management Systems, to consult and openly discuss with stakeholders on environmental and energy issues, and to continuously improve the Group's environmental and energy performance.

The main environmental impacts resulting from all Group companies' operations are related to the consumption of resources (energy, water and materials), the emissions of greenhouse gases and other air pollutants and the contribution to global warming, the production of liquid and solid hazardous and non-hazardous waste, any impact on land and water recipients, any impact on biodiversity and ecosystems in the areas of operation and the environmental nuisance to the local community. In all projects and activities, from the construction stage to the rehabilitation stage, as well as during the operation and maintenance

of the units, the Group focuses on protecting the environment and minimizing the impact of its activities on it. Depending on the activity of each company, but also on each individual project, environmental impacts are identified, assessed and specific mitigation plans or environmental management programs are developed.

The Group identifies and assesses the main risks and threats to the environmental management. Indicatively, the most important risks that have been identified are the possibility of non-compliance with environmental legislation or with the environmental licensing of a project, any pollution incidents in a water recipient, air emissions or dust above the limits, waste spills, any pollution of soil, inefficient use of energy resources, increased water consumption with potential pressure to and alteration of the hydrological characteristics of water bodies. Other risks that have been identified include any nuisance to the local community, such as noise and vibration above thresholds, reduction in the green spaces, any disruption to biodiversity, complaints from stakeholders, environmental impacts from subcontractor's operations and risks related to ensuring business continuity and preparedness to response to emergencies (e.g. pandemics, wars) and alteration of landscape features. In addition, the risks arising from the impacts of climate change and the

transition to a climate-neutral economy are also expected to affect the Group's companies on issues related to their operations. More information on climate change risks in particular is provided in the section ["Climate change"](#).



ELLAKTOR Group, recognizing its impact on the environment, has set as a goal and priority the effective environmental management.



In order to reduce the environmental impacts of its activities and mitigate its environmental risks and impacts, the Group is committed to the following issues, for which it develops action plans and incorporates relevant targets in its strategy:

- ▶ implementation, operation and continuous improvement of Energy & Environmental Management Systems certified according to ISO 50001 and ISO 14001
- ▶ adherence to an internal audit plan to projects by certified internal auditors
- ▶ implementation of best available techniques in terms of environmental protection
- ▶ integrated energy management aiming at rational use and energy saving through actions and control of energy consumption
- ▶ reduction of greenhouse gas and other air emissions
- ▶ minimizing waste, hazardous and non-hazardous, through the reduction of waste generated, reusing to the extent possible, recycling and adopting waste sorting practices at the source, contributing to the promotion of the circular economy and industrial symbiosis

- ▶ rational water management and implementation of water saving and reuse practices
- ▶ rational management and saving of raw materials and natural resources
- ▶ restoration of green spaces and the landscape in general and avoiding deforestation
- ▶ preservation and protection of biodiversity and

- ▶ ecosystems in the areas where it operates
- ▶ effective management of nuisances such as noise, vibration, traffic congestion, in order to reduce the impact on the local community, road traffic, utility networks and protected areas
- ▶ protection of antiquities and monuments of our cultural heritage

- ▶ aesthetic upgrading and harmonious integration of the sites into the immediate and wider environment in which the projects are implemented
- ▶ continuous information, training and awareness of employees on environmental & energy issues including employees of subcontractors
- ▶ consulting with stakeholders and encouraging employees to actively participate in the continuous improvement of the Group's environmental performance
- ▶ implementing contingency plans to reduce environmental impacts in the event of emergencies (waste spills, flooding, fire)
- ▶ reducing the environmental footprint of subcontractors on projects through corrective actions when deviations from internal audits are identified and through employee training
- ▶ collaboration with suppliers to achieve its environmental goals.

ENVIRONMENT & ENERGY MANAGEMENT ACTION PLAN

In order to achieve the targets (short, medium and/or long-term) set in the Climate Change and Circular Economy pillar, the Group has planned a series of actions for the coming years as presented below, the progress of which is analyzed in the individual sections of this chapter.

Total Scope 3 emissions Inventory	▲
Preparation and initiating the implementation of a roadmap towards zero greenhouse gas emissions by 2050	▲
Collaboration with research projects on CO ₂ capture technologies	▲
Investments in renewable energy sources projects and energy storage projects	▲
Increase in treatment plants to handle an additional 470,000 tonnes of waste	▲▲
Design of a Roadmap and Climate Change Risk Management Plan (TCFD)	▲
Preparation and implementation of a program for the protection and conservation of biodiversity	▲
Education and Awareness raising in the local community on biodiversity issues	▲
Adoption of an endangered species that is adjacent to a Group project/activity	▲▲

▲ Short term target (1-3 years)
 ▲▲ Medium term target (4-7 years)
 ▲▲▲ Long term target (8-10 years)

ENVIRONMENTAL AND ENERGY MANAGEMENT SYSTEM

The Group's subsidiaries, which apply certified Environmental & Energy Management Systems, have individual Environmental & Energy Policies that incorporate the above commitments.

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 achieve the reduction of the impact of their activities on the environment and they adopt practices related to recycling, energy saving, efficient water management, wastewater management and biodiversity protection. At the same time, the Group ensures the compliance of its companies with the applicable environmental legislation.

Through the certified Environmental Management Systems, the Group achieves the systematic recording of environmental and energy indicators, which demonstrates the continuous improvement of performance, the identification and integration of the needs and expectations of stakeholders, the identification of threats and the exploitation of opportunities to improve performance,



while also promoting employee awareness of environmental and energy issues and the harmonious integration of the activities' operation in the wider natural and human environment.

The main elements of the Environmental & Energy Management Systems applied in the Group's companies are the following:

Organizational Structure

The Sustainable Development Committee, which has been established, oversees all ESG action plans, particularly on environmental and energy issues, and monitors the Group's environmental performance with the aim of continuous improvement.

The Group's ESG Strategy & Sustainable Development Division, which is supervised by the Sustainable Development Committee, is responsible, among other things, for the systematic monitoring of the environmental management of the Group's companies, the development of appropriate action plans and environmental programs that will lead to the improvement of the environmental performance of the Group's segments of activity, as well as the enhancement of the environmental awareness of the Group's employees and subcontractors.

The Group's main companies have an



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

Training and raising awareness

The Group is committed to provide the necessary resources for all its employees to participate in educational activities on environmental and energy issues. All Group employees receive the environmental and energy induction training and the 18 Basic Rules for the Environment & Energy.

The Group also uses tools to inform and raise awareness among its employees on environmental protection and energy issues, such as awareness campaigns and the transmission of systematic environmental and energy flashes in order to develop an environmentally responsible corporate culture.

Communication and consultation

The ESG Strategy & Sustainable Development Divi-

sion holds monthly meetings with the Environmental & Energy Managers of each subsidiary, to update and monitor the environmental action plans. The Environmental & Energy Managers, in turn, hold regular meetings with the Environmental & Energy Officers of the projects.

Management of any environmental accident

In the event of an environmental accident, the relevant procedures of the environmental management systems in place are followed and corrective actions are taken to prevent and avoid similar incidents in the future.

Waste management procedures

The waste generated from the Group’s activities are managed from collection, storage, any treatment, transport and final disposal to a licensed and registered in the Electronic Waste Registry (EWR) receiver in accordance with the relevant procedures. The aim is to limit air emissions and to manage what is emitted in accordance with legislation and always within the limits of the permit’s environmental terms. Finally, any wastewater that may be generated is treated and, where feasible, reused and disposed to licensed final receivers.

Environmental Management Plan in projects

Depending on the nature and environmental footprint of the various projects, a specific Environmental Management Plan is prepared and implemented to

mitigate their environmental impacts.

Emergency Response Plan

An Emergency Response Plan is developed, a relevant team is appointed and trained and scenario preparedness exercises are carried out.

Environment and Energy Audits

Companies with certified Environmental Management Systems are audited annually by the certification body to ensure the continuous operation and improvement of the systems. In addition, to ensure compliance with environmental legislation, environmental terms and conditions and internal procedures, in 2022 a program of internal environmental audits was implemented, with 98 audits compared to 42 in 2021, by the team of certified internal auditors. From these audits, the deviations identified were recorded in order to define corrective action and a timetable for their withdrawal.

Monitoring and evaluation of environmental & energy indicators

The Group records and monitors environmental performance indicators, which are listed below, and sets targets for their continuous improvement. For the extraction of the indicators, a specific procedure is followed for the collection, processing and control of the data, which are completed at project level by the respective Environment & Energy Manager. Depending on the requirements set by the applicable environmental terms, and in order to ensure compliance with them, the Group conducts measurements at the projects.

Management Review

The Environment & Energy Departments of the Group's subsidiaries coordinate the procedures for the Management Review to monitor the progress of the targets set, the development of the action plans and the approval of the environmental programs for the coming years.

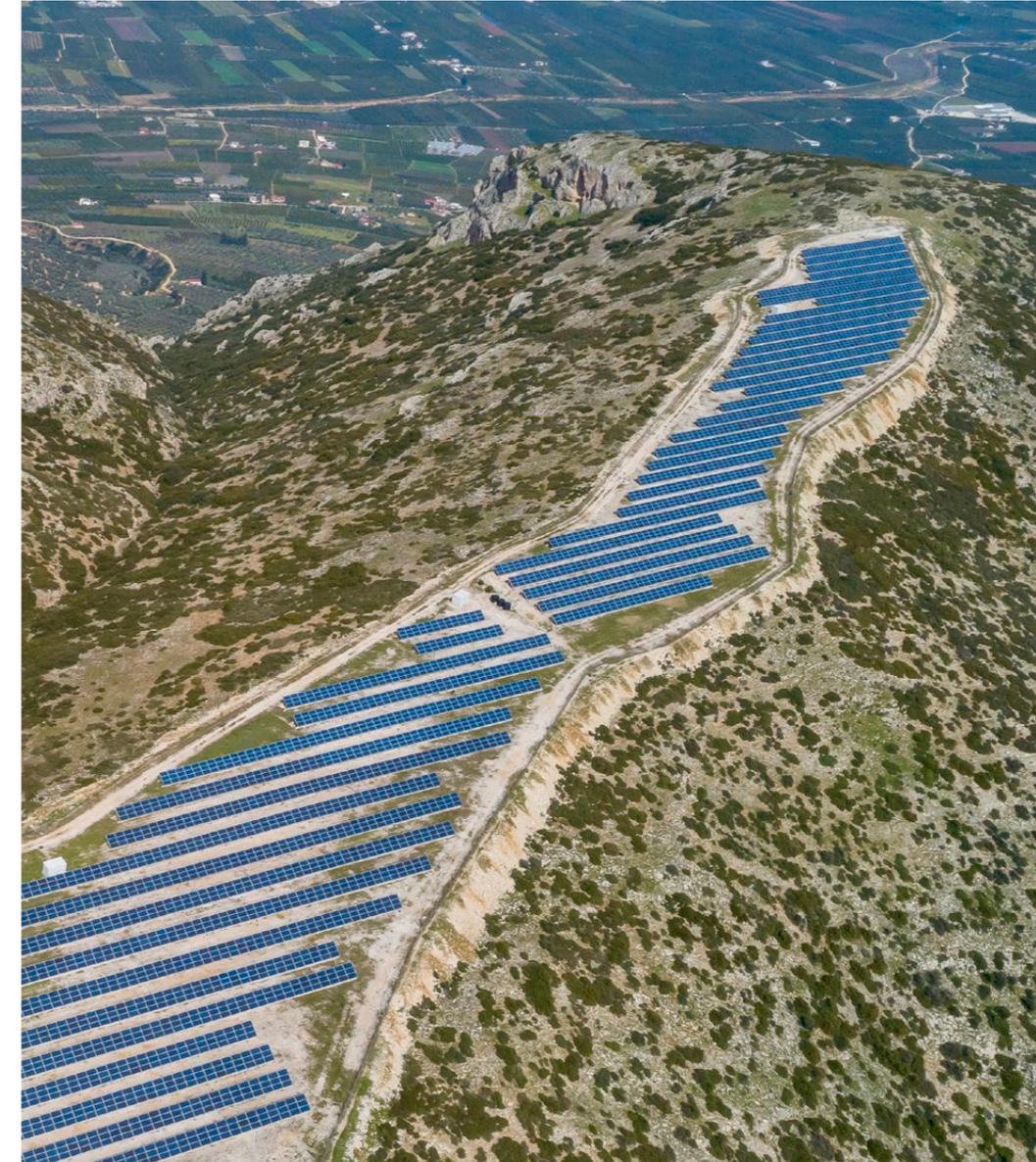
The costs spent on environmental protection projects, such as waste management infrastructure, environmental impact assessments and environmental parameters' measurement, among others, amounted to €1,941,445 for 2022.

In addition, the cost spent on the management of waste resulting from the Group's operations amounted to €537,537.

Continuous effort to create an environmentally and energy responsible corporate culture

In 2022, at Group level, and after continuous efforts to educate and raise awareness of employees on environmental and energy issues, the following were achieved:

- ✓ The Group's Environment & Energy induction training for the projects was redesigned and was presented and promoted to all subsidiaries in order to train all their employees.
- ✓ The Group also implemented the tool for the transmission of monthly Environment and Energy flashes following the successful pilot test at AKTOR, where messages with different themes each time and special messages on global days (e.g. World Water Day) were sent to employees in order to raise awareness on environmental and energy issues.
- ✓ 7,048 hours of training on environmental & energy management issues were provided to Group employees, marking a 53% increase compared to 2021, and 1,124 hours of training on similar issues to subcontractors' employees.
- ✓ 2,057 employees received at least one environmental and energy training, 19% more employees than in 2021.
- ✓ On World Environment Day, a special action was organized at the Group's headquarters and glass water containers were distributed to all employees, avoiding the use of disposable plastics, as well as reusable cloth bags.



Climate Change

ELLAKTOR Group seeks to contribute to the collective European goal of a successful and sustainable transition to a climate neutral economy by 2050, to recognize the risks and opportunities of climate change and to adapt to its impacts.

At the same time, it is considering the expansion of its activities in new areas with the use of innovative technologies, which are going to be areas of great development interest in the next decade.

Production of Renewable Energy Sources

Through the design, development and operation of biogas utilization units, ELLAKTOR Group contributes to climate change mitigation by utilizing methane, which is released from landfills and is the gas with the second largest climate change potential. This way, electricity is produced, which is delivered to the grid, improving the country's energy mix, with the overall positive impact of these plants being much greater than their carbon footprint.

With the completion of the transaction for

the transfer of 75% of the Renewable Energy Sources segment, the Group retains 25% of the Renewable Energy Sources business in its portfolio, contributing to climate change mitigation and improving the country's energy mix while reducing third-party greenhouse gas emissions.

The Group's companies that are active 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). Overall, the Group's companies operate 27 wind farms with a total capacity of 494.2 MW.

In particular, the portfolio of the Environment segment includes the utilization of biogas produced from waste disposal sites and its conversion into electricity (192 GWh) for transmission to the grid. Having significant expertise in the energy utilization of biogas produced in landfills, HELECTOR has 4 biogas utilization units in Ano Liosia, Tagarades, Mavroraichi and Kozani with a total installed capacity of 32.8 MW. It is worth mentioning that the 24.2 MW power generation unit at Fili landfill in Ano Liosia, which was designed, built and operated by the Group, is one of the largest in the world.

The RES projects of the Group's companies that were in operation in 2022 are presented in detail in the

2022 Group's RES projects



27

wind farms

494.2 MW

installed capacity

1,158 GWh

net energy generated



4

biogas utilization plants

32.8 MW

installed capacity

192 GWh

generated energy



3

photovoltaic parks

2.0 MW

installed capacity

3.4 GWh

generated energy



1

hydroelectric power plant

5.0 MW

installed capacity

10.6 GWh

generated energy

[Annex](#). In 2022, the Group's RES segment continued its development and environmental licensing of RES projects. These include three wind farms in Laconia with a capacity of 158.40 MW, three wind farms and a photovoltaic station in Epirus with a total installed capacity of 127 MW. Furthermore, in 2022, Environmental Terms Approval Decisions were issued for the Strategic Investment that the company is implementing with EDPR in Evia, with a total capacity of 374 MW, as well as for a 27 MW photovoltaic power plant in Macedonia.

Energy generation from RES



1,365 GWh

GWh net energy generated



Contribution to emissions avoidance of

1,266 th. tonnes

third-party CO₂ eq.

ELLAKTOR Group operation



251 GWh

energy consumption



69 th. tonnes

emissions of CO₂ eq. in the atmosphere

Through the net production of 1,364.48 GWh of electricity from RES in 2022, the Group is estimated that contributed to the avoidance of 1,266,301 tonnes of CO₂ eq.* third-party emissions into the atmosphere. The energy consumption within the organization for the Group's operation was 251 GWh (see section "[Energy consumption](#)").

"GREEN BOND"

In late 2019 and early 2020, the Group issued 2 international green bonds for a total amount of €670 million. The two bond issues received the "Green Bond" certification from the Climate Bonds Initiative (CBI). It is noted that 100% of the proceeds from the two bond issues were allocated to RES projects already in operation / (total €578 million) or under construction (remaining €92 million).

ELLAKTOR proceeded to the early full repayment of the above bonds in December 2022, two years earlier than their scheduled expiration date.



* CO₂ emission factor used: Country's Energy Production Mix for 2021 Report [ENERGY MIX 2021, DAPEEP S.A. (Operator of RES & Origin Guarantees), July 2022]. To calculate CH₄ emissions, the relevant factors from the 2020 DAPEEP Report, the National Greenhouse Gas Emissions Inventory Report 2022 and the CRF tables for 2022 have been used. The amount of methane that is fed into the biogas plants for combustion and not released into the atmosphere has also been calculated.

Energy consumption

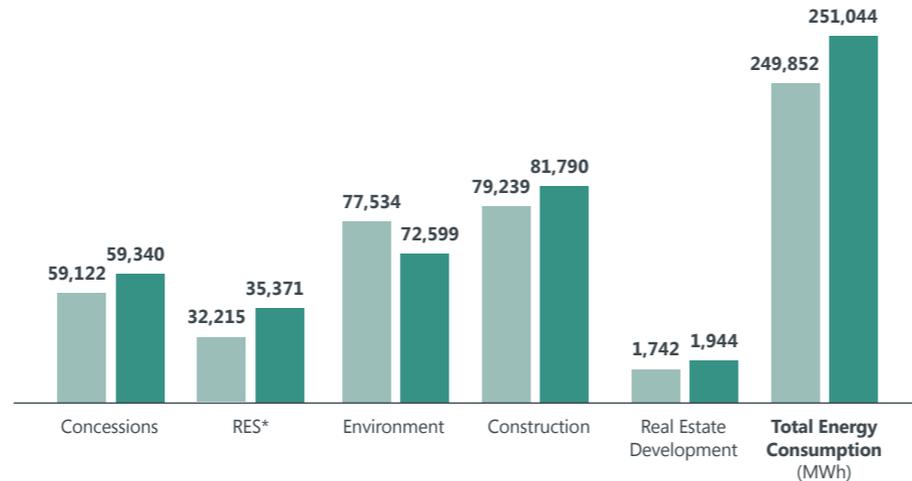
An integrated energy management is applied throughout the Group's activities, aiming at the rational use and saving of energy, through programs and actions. Energy consumption is systematically recorded and monitored, both in the Group's projects and at the headquarters. In order to manage energy more efficiently, AKTOR, TOMI, AKTOR FM, ATTIKES DIADROMES, ATTIKI ODOS, HELECTOR and MOREAS companies apply certified Energy Management Systems, according to the ISO 50001:2018 standard.

In 2022, the Group's total energy consumption amounted to 251,044 MWh (904 TJ). Most of the energy consumed came from fuel consumption (45%) with the main fuel being diesel (37.1%), which is mainly used for heavy vehicles (excavators, loaders, trucks, etc.), and electricity from the grid (40%). The percentage of electricity consumed that came from renewable sources was 15%. Energy uses for the Group's operations mainly include the operation of project machinery, vehicles and electromechanical equipment, heating, cooling and ventilation systems, combustion plants, motorized systems (compressed air and pumping), generators and lighting.

At the headquarters, with the implementation of energy saving practices, such as the elimination of the use of UV lamps and the re-training of employees to improve their energy behavior, energy consumption amounted to 0.219 MWh/m², presenting a reduction of approximately 5% compared to 2021.

For 2022, energy management actions were recorded in the Group's projects and activities with an estimated saving of 200 MWh and €58,000 per year, for which €190,000 was spent.

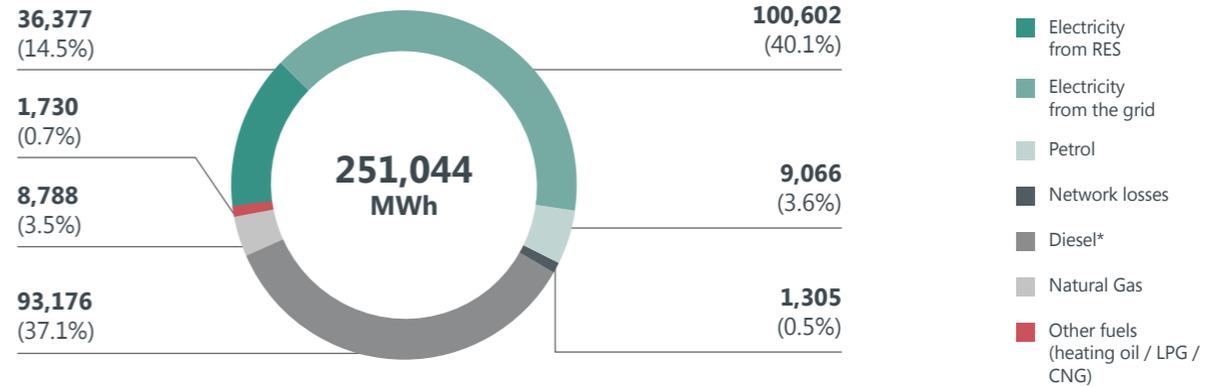
Energy consumption per activity segment (MWh)



* The RES segment includes the data of parent company ELLAKTOR S.A.

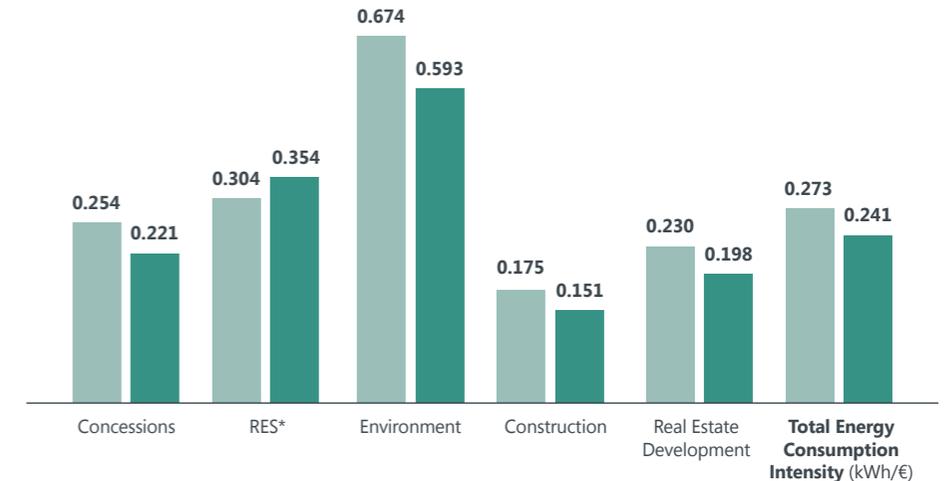
** 2021 indicators have been recalculated based on the turnover after intrasegment eliminations for comparison purposes with the corresponding 2022 indicators

Energy consumption (MWh)



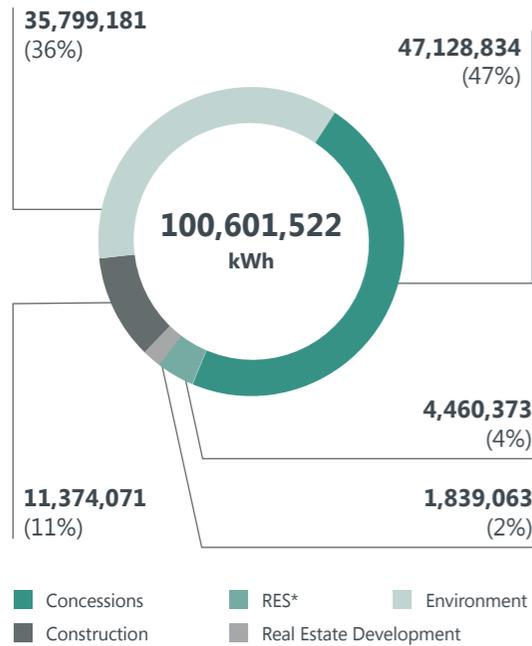
* The consumption of diesel relates to the use of Heavy Vehicles such as excavators, loaders, trucks (54.9%), the use of company vehicles (40.6%) and the use of stationary equipment (4.5%)

Energy consumption intensity per activity segment (kWh/€)**

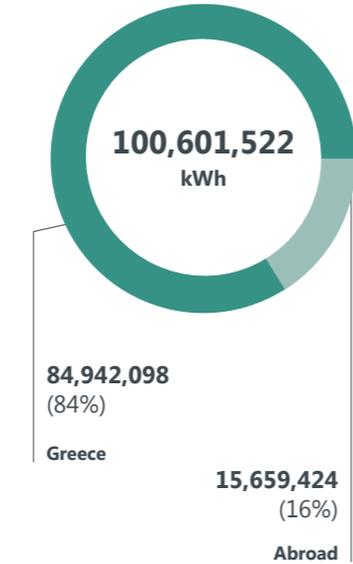


■ 2021 ■ 2022

Electricity consumption from the grid by activity segment (kWh)



Consumption of electricity from the grid (kWh)



Intensity of electricity consumption from the grid by activity segment (kWh/€)



*The RES segment includes the data of parent company ELLAKTOR S.A.

EPALTHEA - Waste to Energy

HELECTOR, through EPALTHEA S.A., is the market leader in Hazardous Waste Management of Healthcare Units, as it has constructed and manages the only Hazardous Waste Incinerator of Healthcare Units in Greece, at the Ano Liosia Landfill.

The project is led by the EDSNA (Special Intergraded Association of the Prefecture of Attica) while HELECTOR participates with a 60% share.

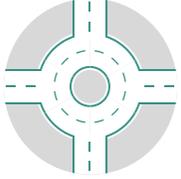
The Integrated Waste Management Facility plant at the Ano Liosia Integrated Waste Management Facility is the only integrated and fully licensed hazardous waste incineration plant for hazardous waste from healthcare units and similar wastes and receives over 4,000 tonnes of waste per year from 1,800 sites across the country.

The existing facility has a daily capacity of 30 tonnes, 2 independent incineration lines, temporary cold storage chambers, internal wastewater management, a radioactivity detection gate and continuous recording of air emissions.

The round-the-clock and uninterrupted operation of the incineration unit ensures the lawful destruction of all collected waste in a short period of time and the provision of the necessary documents - certificates of complete destruction by the final disposal unit within a few days, applying advanced technologies and the best available techniques (BAT).

In the framework of the new contract that provides for the continuation of the concession of the operation of the Thermal Treatment Plant for Hazardous Medical Waste and the upgrading of the equipment, HELECTOR, always a pioneer, proceeds with the conversion of the incinerator into a Waste to Energy plant and the management method that will be carried out will now be R1 recovery. With this upgrade, the unique Hazardous Medical Units' Waste incinerator is moving up the waste management hierarchy pyramid, as waste is now treated as a useful material for energy production, significantly reducing the environmental footprint of the plant and surpassing all other Hazardous Medical Units' Waste management methods in the country.

The new facility will include an energy recovery system and through an advanced Organic Rankine Cycle (ORC) plant, will have the capacity to produce up to 850 kWe. In the case of the incinerator, the aim is to produce, through heat recovery, power to drive a turbine and a generator to produce electricity which will be used within the facility.



ACTIONS TO REDUCE ENERGY CONSUMPTION

In 2022, MOREAS achieved an 11% reduction in energy consumption compared to 2021, while actions were implemented to save approximately 137 MWh/year of electricity, such as:

- ▶ Replacement of open road luminaires of older technology (High Pressure Sodium - HPS) with new technology luminaires, LED type, in three parking areas of the Highway. Through this upgrade, energy savings of 44%, approximately 5 MWh/year, are expected.
- ▶ Replacement of 24 open road luminaires of older technology (High Pressure Sodium - HPS), with new technology luminaires of LED type at the approach and departure points at the Spathovouni Toll Station. Through this upgrade, energy savings of 50%, approximately 14 MWh/year, are expected.
- ▶ Energy upgrade of the square of the Spathovouni Toll Station through the replacement of 8 pylons and 40 luminaires with corresponding LED lumi-

naires. Through this upgrade, energy savings of 64% are expected, i.e. around 110 MWh/year.

- ▶ Replacement of about 40 luminaires in office areas of Nestani Control & Maintenance Center with LED type ones. This action is estimated to reduce energy consumption by 84% (7.5 MWh/year).

Through the planning and implementation of energy saving actions, a systematic trend of reducing electricity consumption has been recorded over the last 6 years.



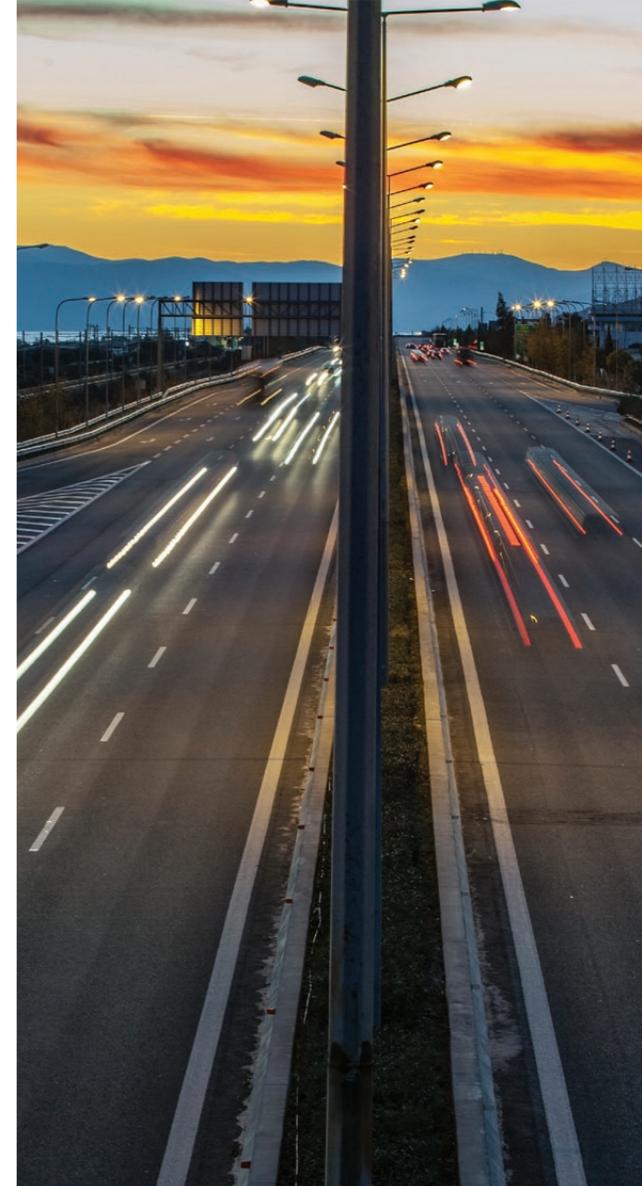
MONITORING OF ENERGY INDICATORS

Environment segment companies, seeking continuous improvement in their environmental performance, monitor over time specific performance indicators (such as energy consumption per quantity of waste treatment, energy consumption per sterilization cycle, etc.) in their plants.

With regard to the Environment segment and as the production process of waste treatment plants is particularly energy-intensive, the Group attaches great importance to the way in which energy needs are managed and constantly analyses potential opportunities to improve energy efficiency, while taking the appropriate implementation 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 Maintenance and Inspection program of equipment.
- ▶ Implementation of emergency systems for maintenance works and possible disruptions to the operating system.

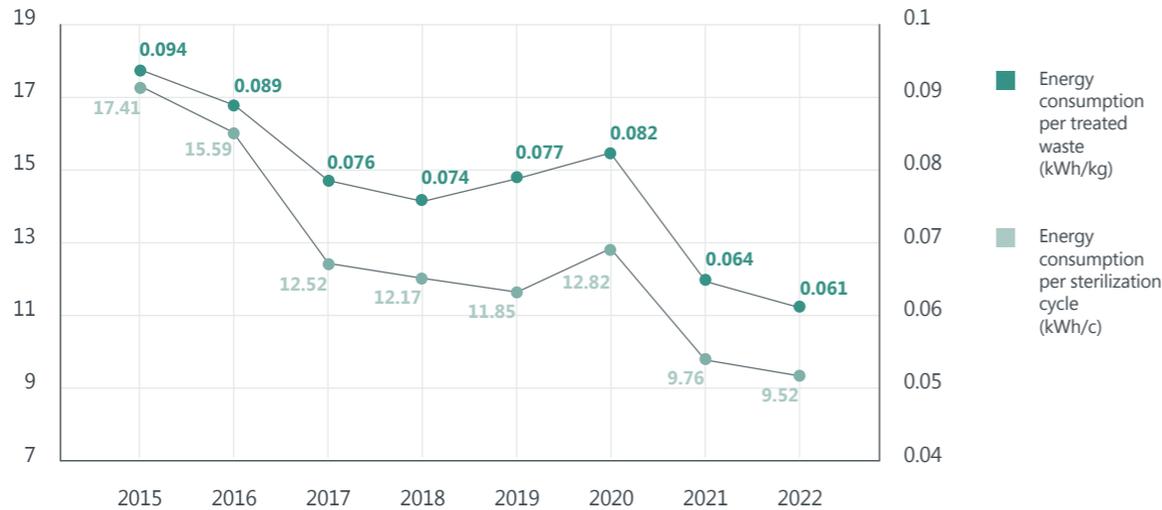
* These actions concern mostly the Joint Venture of Apotefrotiria, EPALTHEA, STERILISATIONS, EDADYM and BEAL.



STERILISATION S.A.

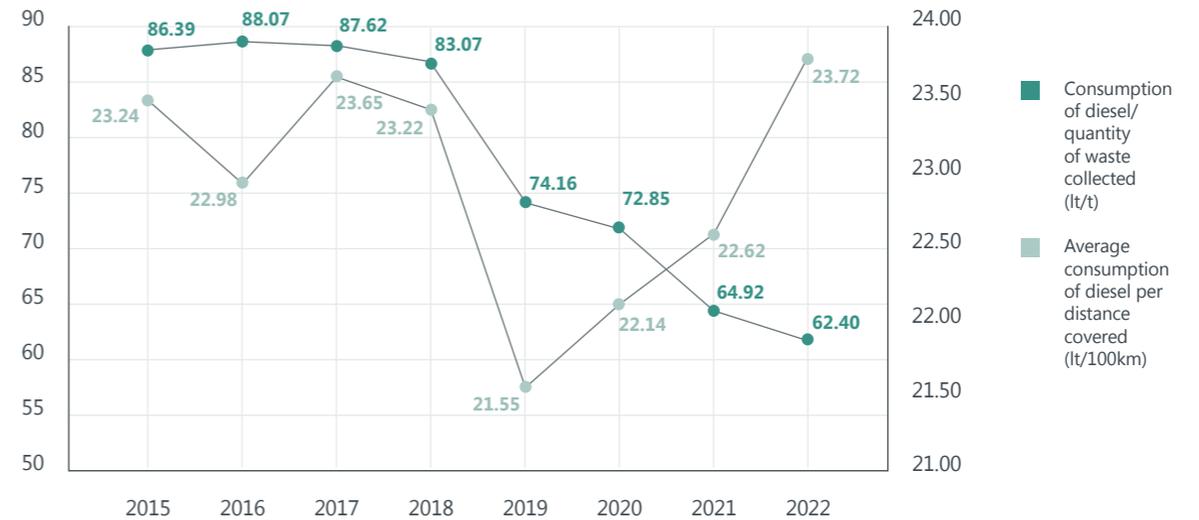
At the beginning of 2022, the increased amounts of waste to be managed continued due to the COVID-19 pandemic, but from April onwards a gradual leveling off took place. With the Plant now being fully developed (4 sterilization systems), the successful management of its energy requirements continued and in combination with energy saving actions (such as effective adjustment of burners and steam network in 4 systems, replacement of luminaries, optimization of the Plant's operating schedule etc.), the reduction of energy consumption intensity continued (per sterilization cycle and per processed quantity (kg)) continued further, as shown in the graph below:

Specific energy consumption "STERILISATION S.A."



With the support and continuous use of the company vehicle fleet IT and Telematics Systems, the diesel consumption per quantity of waste collected and the average diesel consumption per distance covered are recorded, as shown in the graph below. As presented in the graph, there is an increase in the average diesel consumption per distance covered by the company's vehicles, due to the continued increase in the weight of the transported waste per load, so the vehicles were operating with a larger load, which affected their overall average fuel consumption, but also resulted in a decrease in the specific fuel consumption per quantity of waste collected.

Figures of fuel consumption for transporting waste by "STERILISATION S.A."





AKTOR Facility Management 2022 received 6 awards and the honorary distinction "Energy Supplier of the Year" at the "Energy Mastering Awards" ceremony.

The company's distinctions were 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.

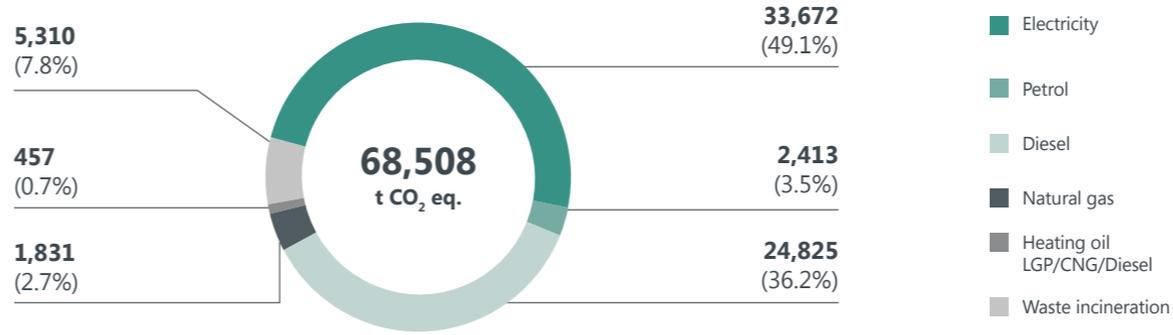
Greenhouse Gas Emissions (GHG)

In 2022, the Group's greenhouse gas (GHG) emissions are estimated at 68,508 tonnes CO₂ eq. (scope 1 & 2) reduced by 24% compared to 2021, of which 49% (33,671 tonnes of CO₂ eq.) comes from the consumption of electricity from the grid (indirect emissions - scope 2) and the remaining 51% (34,837 tonnes of CO₂ eq.) from the consumption of natural gas, heating oil, diesel, petrol, LPG, CNG and waste incineration (direct emissions - scope 1). This reduction is due to energy saving actions implemented in 2022 and the improvement of the country's energy mix.

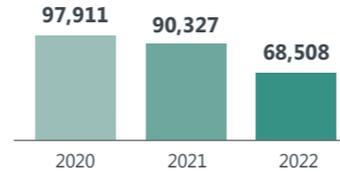
In addition, emissions from the processes of biogas utilisation activities are estimated at 87,993 t CO₂. However, it is worth mentioning that the CO₂ emissions from this activity would be several times higher if these plants did not exist, as CH₄ would be released into the atmosphere; therefore, the overall positive impact of these plants is much higher than their carbon footprint.

Indirect emissions from grid electricity consumption (scope 2) decreased by 46%, while direct emissions (scope 1) increased by 23% compared to 2021.

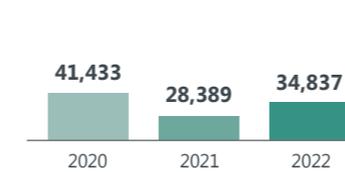
GHG Scope 1 & 2 (t CO₂ eq.) emissions



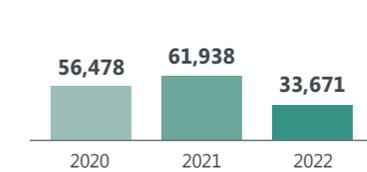
GHG Scope 1 & 2 (t CO₂ eq.) emissions



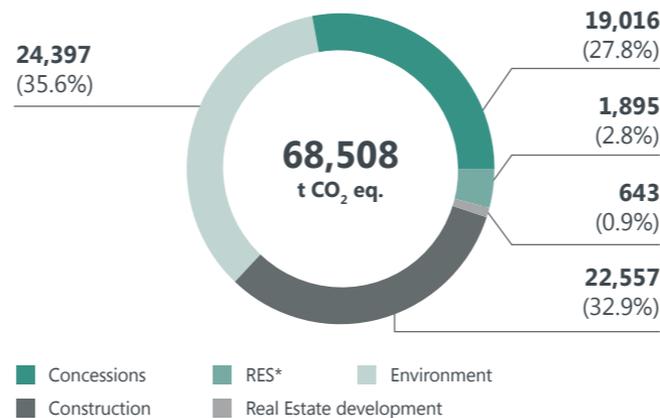
GHG Scope 1 (t CO₂ eq.) emissions



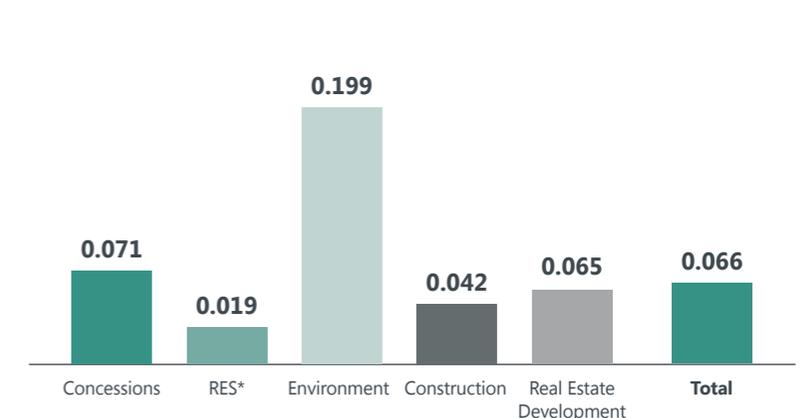
GHG Scope 2 (t CO₂ eq.) emissions



GHG Scope 1 & 2 (t CO₂ eq.) emissions per segment of activity



Intensity of GHG Scope 1 & 2 emissions per segment of activity (kg CO₂ eq./turnover €)



*The RES segment includes the data of parent company ELLAKTOR S.A.

It should be noted that ELLAKTOR Group is in the process of reviewing its direct and indirect greenhouse gas emissions in order to identify all direct emissions and examine additional indirect emissions. In this context and following the issuance of the non-financial information of the Annual Financial Report 2022, the Group proceeded with the calculation of emissions from cooling/air conditioning equipment, which amounted to 2,581 t CO₂ eq. and the calculation of emissions from waste management within projects, which amounted to 831 t CO₂ eq.

The methodology for calculating emissions for the reference year 2022 is based on both the widely recognized GHG Protocol and the ISO 14064-1 International Standard. To this end, and in order to calculate emissions with the smallest possible deviations, any revision of the emission factors has been taken into account, in accordance with the proposed hierarchy of selecting emission factor sources as proposed in the above standards.

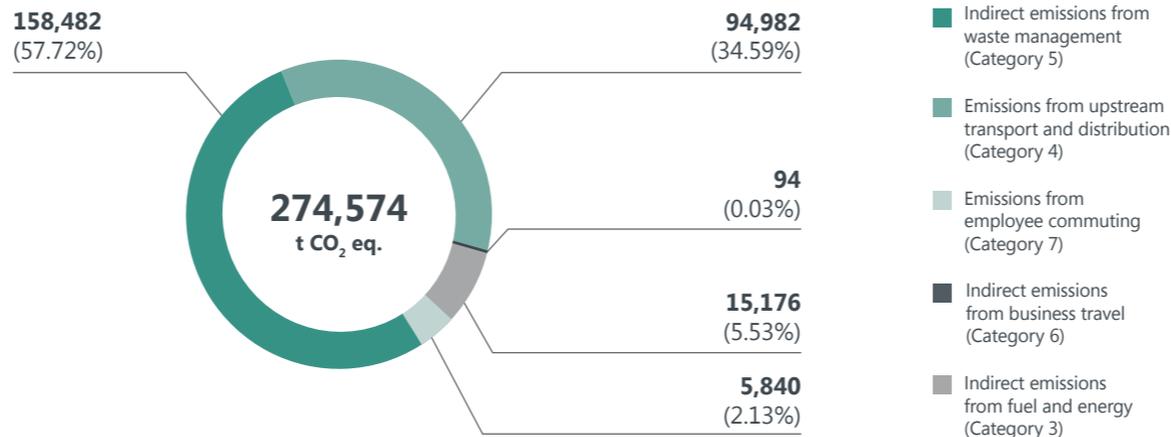
Other indirect GHG Scope 3 emissions (t CO₂ eq.)

The Group in 2022 based its emissions calculation methodology on both the widely recognized GHG Protocol and the International Standard ISO 14064-1 and collected information for the calculation of the scope 3 categories mentioned in the above standard.

Regarding the factors used to calculate the energy of third-parties, the methodology used as for the energy consumption of scope 1.

The third-party emission categories (scope 3) recorded by the Group were calculated at 274,574 t CO₂ eq.² and are shown in the following chart by category.

Other indirect GHG Scope 3 emissions (t CO₂ eq.) per category



Note 2: In case a subsidiary of the Group operates as a subcontractor for another subsidiary, the energy consumption has been recorded by the 1st subsidiary offering its services and has been calculated in scope 1.

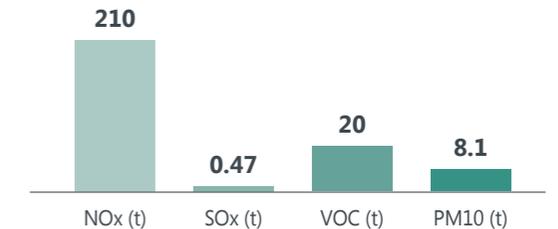
Note 1: For the calculation of CO₂ emissions from fuel consumption in stationary and mobile equipment (natural gas, diesel and petrol in stationary equipment and diesel, petrol, LPG and CNG in mobile equipment), the corresponding emission factors from the National Inventory 2022 Report and Tables (National Greenhouse Gas Emissions Inventory Report 1990-2020, April 2022 and Common Reporting Format (CRF) tables, September 2022) were used. Indirect CO₂ emissions from electricity consumption from the grid are calculated based on the emission factor of the Energy Mix of the Country for 2021 (ENERGY MIX 2021, DAPEEP, July 2022).

To convert CH₄ and N₂O emissions into tonnes of CO₂ equivalent, the values of the global warming potential over a 100-year time horizon, included in the IPCC's 5th Assessment Report (AR5), have been used. To calculate CH₄ and N₂O emissions from fuel and electricity consumption, the relevant factors from the 2020 DAPEEP Report, the National Greenhouse Gas Emission Inventory Report 2022 and the CRF tables for 2022 were used.

Air Pollutants and Air Quality

The Group's main priority is to ensure the quality of the atmosphere in and around its projects. In this context, and also for monitoring purposes of other air emissions, it proceeded to the calculation of NO_x, SO_x, VOC, PM10 emissions resulting from direct energy consumption (natural gas, diesel for machinery, diesel for motor vehicles, petrol for machinery, petrol for motor vehicles, LPG and CNG). Emission factors from the EMEP/EEA Air Pollutant Emission Inventory Guidebook 2013, as well as national guidelines (for SO_x) were used for the calculations.

Other air emissions



Specifically, the Group's Environment segment applies the best available techniques for combustion and conducts frequent audits in order to minimize air emissions.

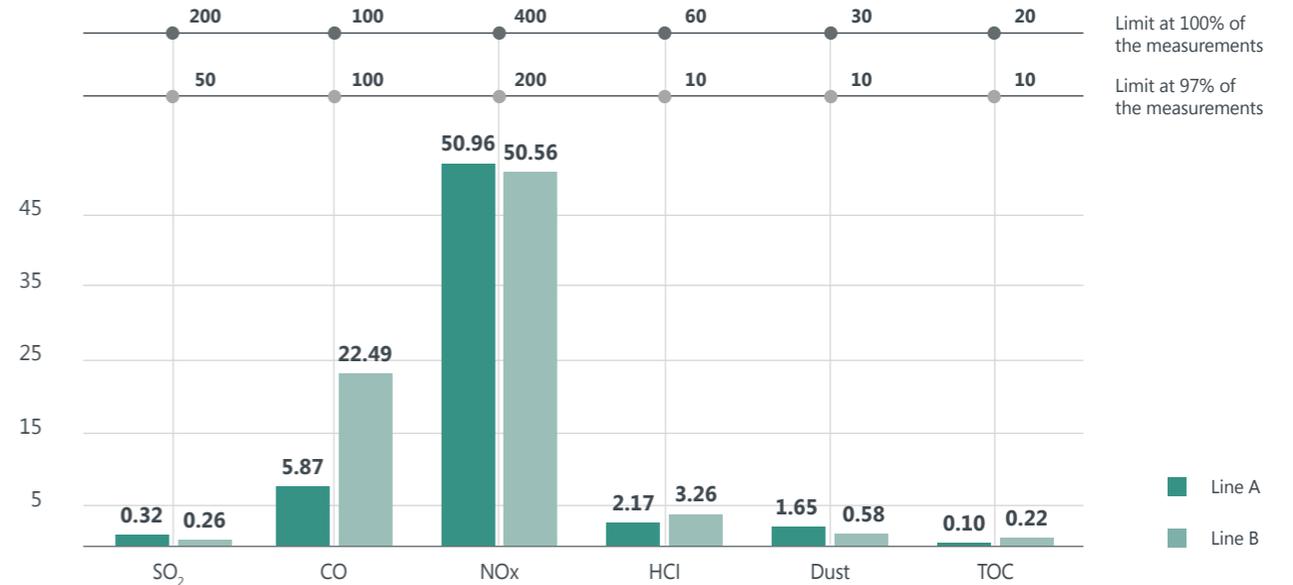


HELECTOR: Monitoring of air emissions from medical waste incineration facility in Ano Liosia.

HELECTOR implements an air emissions monitoring plan to its medical waste incineration facility in Ano Liosia, in accordance with the requirements of the relevant legislation. The aim is the technical evaluation of the combustion parameters' performance, as well as the continuous and regular operation of the incineration plant. The project concerns online analytical monitoring systems for parameters and air pollutants pollutant as well as in periodic monitoring of air pollutant concentrations by external certified laboratories.

The monitoring of air emissions is carried out using modern measurement equipment. The measurement program covers both point and fugitive emissions on a continuous and periodic basis. The analyzers are connected to the plant's Control System (DCS), which provides the ability to fully control the operation of the units in order to minimize air pollution.

Annual measurements of air pollutants (mg/Nm³) every 30 minutes in the two parallel incineration lines A and B for 2022, compared to the relevant limits set by legislation (limits checked at 100% and 97% of measurements).



Climate change adaptation

The risks arising from the impacts of climate change and the transition to a climate-neutral economy are expected to affect the Group's companies in matters related to their operations. Specifically for climate change risks, the Group has identified the following:

- ▶ physical climate hazards and associated phenomena (e.g. severe weather conditions, floods, fire, landslides, precipitations subsidence),
- ▶ transition risks related to the costs of energy transition, rising raw material costs and increased requirements for climate-related information disclosure resulting from legislative changes.

Specifically, to address the risks arising from climate change, the Group has committed to and has incorporated into its strategy a series of actions aimed at successfully transitioning to zero emissions by 2050 and adapting to the inevitable impacts of climate change. To this end, it plans to identify all sources of greenhouse gas emissions resulting from its activities, recording direct emissions and additionally examining indirect emissions related to sources not owned or controlled by the Group, but resulting from its activities. This process will form the basis for a roadmap for a sustainable transition to a net zero-emission future. In this context, within 2022, specialized Energy Management Teams (EMTs)

were created by each subsidiary to examine the mapping of each company's energy consumption by energy use, identify improvement opportunities and record energy saving actions. In addition, in order to strengthen its resilience, the Group is in the process of identifying and analyzing climate risks and their potential financial impacts in line with the recommendations of the TCFD (Task Force on Climate - related Financial Disclosures) and designing a Climate Risk Mitigation Program.

In the context of compliance with the criteria established in the EU Taxonomy Regulation, relating to climate change adaptation, the Group is in the process of a detailed assessment of the natural climate risks that are material to its business. The assessment is based on best practices and the following Climate Delegated Act guidelines:

- ▶ conducting an audit of the Group's activities in order to identify the physical climate risks that may affect the performance of its economic activity during its expected duration (e.g. land precipitation, landslide, storm, flood, etc.),
- ▶ assessing the likelihood of a threat from one or more of the physical climate risks, with a climate risk and vulnerability assessment to evaluate the materiality of the natural climate risks to the economic activity,
- ▶ assessing climate change adaptation measures that can reduce physical climate risk identified,
- ▶ an assessment carried out using as a minimum climate projections on the smallest appropriate scale, for activities with an expected duration of less than 10 years.



Circular economy and waste management

The transition to a circular economy is a key dimension of the European Green Deal, which aims to make the European economy carbon neutral by 2050, decouple economic growth from the use of natural resources and its fair implementation to all Europeans.

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, creating long-term value for the economy, society and the environment.

Recognizing the importance of the circular economy, but also the significant challenges in the transition process, the Group adopts practices for the transformation of the linear production model into a circular one, as it is the only solution to limit the use of material resources and the production of waste. By adopting the circular economy model, the Group aims to preserve resources in the product life cycle with the highest possible value and for the longest possible period of time.

Waste Treatment Plants



The Group's activity and specifically the Environment's segment is inseparably linked to the circular economy, as through the company HELECTOR, it is operating in the waste management sector. HELECTOR is one of the largest companies with expertise in the Waste Management segment in Southeastern

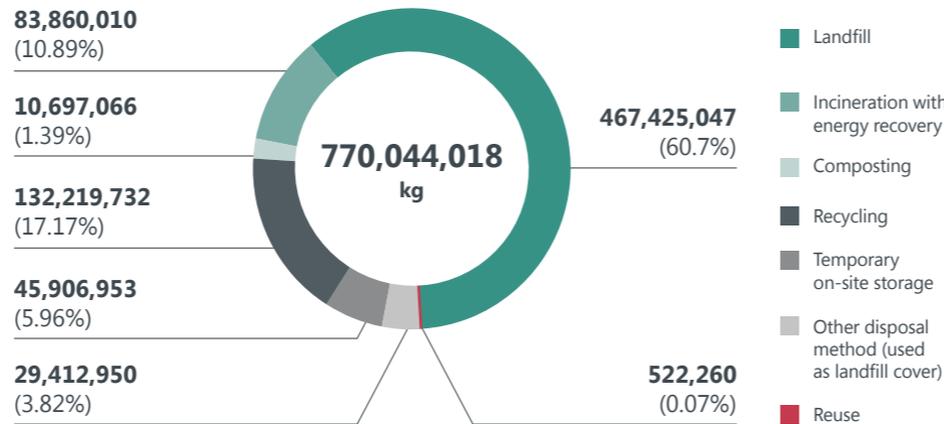
Europe, and is active throughout the whole spectrum of design, construction and operation of modern waste treatment plants, biological waste treatment plants and biogas energy recovery at landfills.

The company's plants apply Best Available Techniques (BAT) at all stages of waste treatment and management in order to enhance recycling, produce useful secondary products, minimize carbon dioxide emissions, minimize landfill residue, divert biodegradable fraction from the landfill, and ultimately make a significant contribution to the transition to a

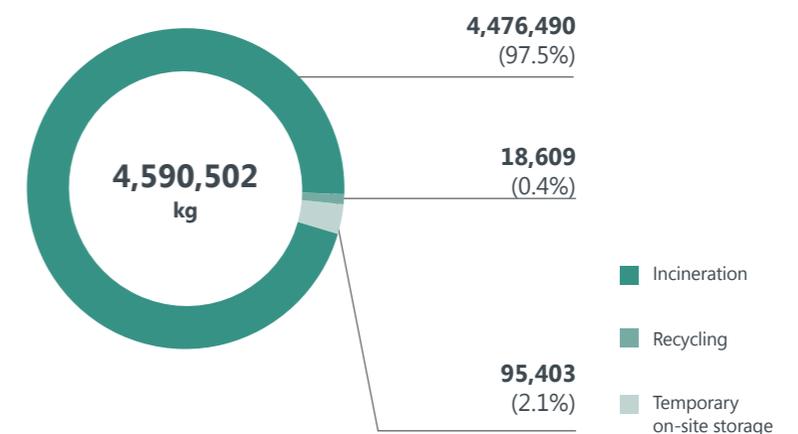
circular economy.

More specifically, in 2022 the waste treatment plants, in which the companies of the Environment segment participate, managed 949,350 tonnes of waste compared to 925,246 tonnes in 2021, of which 940,840 tonnes of non-hazardous waste (municipal waste) and 8,510 tonnes of hazardous waste (medical/infectious waste). The method of managing the output waste from these plants is presented below.

Management methods for output non-hazardous waste (kg)



Management methods for output hazardous waste (kg)



Note: The difference in the quantity of input and output waste (hazardous and non-hazardous) is due to the treatment method, the loss of moisture in the waste, as well as to quantities of stored waste from the previous year that were treated in 2022 and quantities of new incoming waste temporarily stored at the end of the year pending to be managed.



With regard to the transport of hazardous waste (e.g. medical waste), the companies of 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 2022, a total of 8,510 tonnes of hospital waste were transferred.

Regarding the Treatment of Hazardous Waste of Healthcare Units, the Group manages through the Joint Venture of Apotefrotiria HELECTOR S.A. - ARSI S.A., the only Incinerator in Greece of hazardous waste of healthcare units at the Ano Liosia Landfill, which has been operating since 2002. In 2022, the plant received 4,352 tonnes of hazardous waste from healthcare facilities (hospitals, clinics, microbiological laboratories, private practices, dental clinics, veterinary clinics and pharmacies), applying advanced technologies and Best Available Techniques.

In addition, the Group, through its subsidiary STERILISATION, manages the sterilization unit for Purely Infectious Hazardous Waste (PIHW) and the storage of Mixed Hazardous Waste (MHW) and Other Hazardous Waste (OHW) of healthcare Units in the 2nd Industrial Area of Volos. Specifically, in 2022, the plant processed 4,158 tonnes of hazardous waste through advanced inactivation methods and techniques.

More specifically, the Group's portfolio in Greece and abroad in the Environment segment includes:

- ▶ The Integrated Solid Waste Management

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

- ▶ The operation and maintenance of the Mechanical Recycling and Composting Waste Plant (Prasino EMA) in Ano Liosia with a capacity of 350,000 tonnes per year. Prasino EMA is currently the only municipal solid waste treatment plant operating in Attica, which manages approximately 1/6 of the total waste generated in the entire Region.
- ▶ The Mechanical Biological Treatment Plant in Larnaca, Cyprus, which uses optical separation technology to recover recyclables from mixed waste, with a capacity of 190,000 tonnes/year.
- ▶ The Hazardous Medical Waste Incineration Plant is the only licensed facility for hazardous medical waste in Greece, for the management of hazardous medical waste by thermal treatment (incineration) with a capacity of 12,000 tonnes per year, thus covering the entire needs of the country's Healthcare units (approximately 1,800 units related to healthcare). The plant contributes to safeguarding public health and to the efficient and proper management of hazardous waste. In addition, part of the thermal energy produced is reused by the plant, in order to reduce the overall energy requirements. In 2022, the new

contract for the upgrading of the incinerator and its conversion into a Waste to Energy plant was signed.

- ▶ The Sterilization Unit for Purely Infectious Hazardous Waste (PIHW) and the storage of Mixed Hazardous Waste (MHW) and Other Hazardous Waste (OHW) of Healthcare Units, has a capacity of 18 tonnes per day and is supplied by a privately owned fleet of collection -of hazardous medical waste and by collaborating companies that serve Healthcare Units.
- ▶ Two Recycling Sorting Centers (RSC) with a total capacity of more than 175,000 tonnes per year.

Through the practices applied in the projects, high reuse and recycling rates are achieved, preserving the value of natural resources, raw materials and products. Indicatively, in 2022, the following were achieved:

- ▶ Utilization of 31,900 m³ of treated wastewater from leachate treatment plant of Integrated Solid Waste Management System (IWMS) in Western Macedonia, for covering operational needs such as cooling the biological treatment plant, cleaning the waste

treatment plant (WTP) and irrigation.

- ▶ The Urban Solid Waste Recycling subsidiary (ASA RECYCLE), which processes blue bin and glass waste. In particular for the glass quantity, a recycling rate of 67% of the total waste processed was achieved.
- ▶ At the Mechanical Recycling Plant of Ano Liosia, 329.14 tonnes of high-quality compost from bio-organic waste were produced, which were distributed in packaged or in bulk at the request of the EDSNA (Special Inter-collective Association of the Prefecture of Attica), which is the Project owner. This compost meets the limits of Decision (EU) 2015/2099 on establishing the ecological criteria for the award of the EU Ecolabel to soil improvers.
- ▶ Production of 10,799 tonnes of SRF (solid recovered fuel) at the Mechanical Recycling Plant of Ano Liosia and 22,244 tonnes at the Osnabrück waste treatment plant in Germany for use as secondary fuel in cement industries.
- ▶ Sorting and recycling of mixed waste and redirecting recyclable materials to producers/recyclers of

raw materials. In 2022, the Integrated Solid Waste Management System (IWMS) in Western Macedonia processed 110,365 tonnes of waste, 14.89% of which was recovered. Overall, at plant level, 30% of the incoming mixed waste coming from the Region of Western Macedonia was either reused for the needs of the plant as compost (as a coating material for the landfill), or as a quarry rehabilitation material, or provided as recyclable material.

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

Biogas utilization and upgrading of the Leachate Treatment Plant at Mavroraçi Landfill

HELECTOR, a member of the ELLAKTOR Group has undertaken two projects of strategic importance for the energy and environmental improvement of the Region of Central Macedonia. Having extensive experience in the utilization of biogas from landfills for electricity production and significant expertise in the development and maintenance of the biogas pumping network from Landfills, HELECTOR has constructed and operates since 2020 the biogas power plant at the Mavroraçi Landfill, with a capacity of 3.52 MWeI. In 2022, the expansion, upgrade and operation of the existing Wastewater Treatment Plant of Mavroraçi Landfill was signed. The project aims at the extension construction and upgrading of the existing leachate management facilities of the landfill of Mavroraçi. The new Leachate Treatment Plant (LTP), which will be built alongside the existing LTP, will have a capacity of 400m³/day. The biological treatment system to be applied will be that of activated sludge with simultaneous stabilization of the biological sludge and advanced nitrification and denitrification. The separation of sludge - treated wastewater will be conducted in an external membrane system (R-MBR).



HELECTOR S.A. - Municipal District Heating Company of Amindeo (DHCA): Amindeo teleheating and energy utilization of biomass and secondary fuel

In 2022, the Amindeo 30 MW biomass district heating project with annual distribution of ~50,000 MWh of thermal energy was commissioned. The Municipality of Amindeo and the operator of DHCA, with the significant contribution of HELECTOR as the contractor for the construction, proceeded to the combustion with energy recovery of agricultural corn residues (low-cost biomass). This project contributes to the circular economy, helps to reduce the heating costs of the residents of the wider area by reducing the energy production operational costs and ensures the sustainability of the thermal energy production units. The project connects about 2,000 residences and public buildings and covers the areas of Amindeo, Levaia and Filotas.

Combining a Waste Treatment Plant with a Thermal Energy Production Unit for district heating for the next two years, pilot trials will be carried out for the utilization of secondary fuels (SRF/RDF) by the Amindeo thermal energy production units mixed with biomass. The secondary fuel comes from the Waste Treatment Plant (WTP) of Western Macedonia in Kozani operated by HELECTOR S.A. through its subsidiary EDADYM SINGLE MEMBER S.A. Through this project, a theoretical substitution of lignite in Amindeo by secondary materials coming from the West Macedonia WTP is expected, while minimizing the landfilling of residual streams and using difficult recyclable materials with high calorific value.



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 2022. The company

HELLENIC QUARRIES aims, through the operation of these two units, to decrease and gradually eliminate uncontrolled waste disposal to sensitive areas, 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 ECDW received by the two units during the year was 278.39 tonnes.

HELLENIC QUARRIES maintains a monitoring program for factors related to the aggregate production process at the construction's 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. In addition, the company records vibrations during the blasting phase for landscape formation, in order to monitor compliance with the vibration limits.

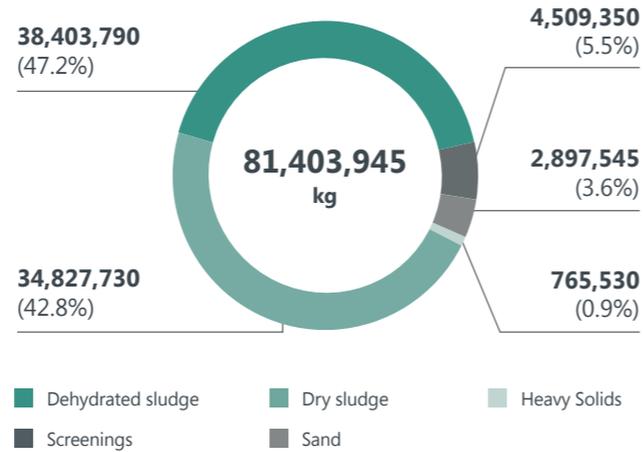
Wastewater Treatment Plants

WASTE MANAGEMENT IN WASTEWATER TREATMENT PLANTS

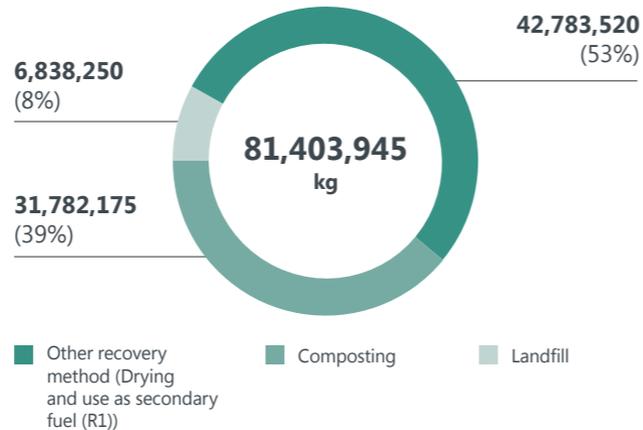
In parallel, the Group is active in the construction, operation and maintenance of Wastewater Treatment Plants. Amongst other, it is responsible for the operation and maintenance of the Psyttalia Wastewater Treatment Plant, on behalf of EYDAP, which is one of the largest environmental projects in Greece,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

In 2022, the Wastewater Treatment Plants in which the Group's companies participate managed 297,096,460 m³ of wastewater and received 7,956 tonnes of sludge for treatment. The methods used to manage solid waste produced from operation and maintenance of waste-water treatment plants or received for treatment at these plants, are presented in the following diagram.

Waste output from Wastewater treatment plants



Waste management methods of wastewater treatment plants





Solid Waste Management

The Group's waste management policy, including both hazardous and non-hazardous, aims primarily to reduce the quantity of waste produced and the degree of their hazard characteristics but also to improve environmental performance indicators by diverting as much as possible from landfill.

In this context, actions are implemented taking into account the hierarchy in waste management, with emphasis on preventing waste generation and preparing it for recycling and reuse. The promotion of recovery (R) methods over disposal (D) methods is achieved through waste sorting processes at source, which include employee's training and awareness-raising, the development of appropriate infrastructure, cooperation with appropriate and approved collection facilities and monitoring of overall performance, thus contributing to the circular economy and ecosystems' protection.

Waste management is based on the requirements of national and European legislation, as specified in the Environmental Terms Approval Decisions, as well as any other requirements due to internal procedures, customer requirements and the specificity of each project or activity.

The collection and transport of waste is carried out by licensed companies registered in the Electronic Waste Registry of the Ministry of Environment and Energy and are disposed 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.

Alternative management waste, such as waste electrical and electronic equipment, accumulators, waste mineral oils, used vehicle tires, etc., is managed through approved alternative management systems.

Any hazardous waste generated is temporarily stored on-site, in specially designed areas (covered areas with a waterproof floor and perimeter safety barrier), until they are directed for recovery or disposal through collectors registered to the Electronic Waste Registry to the final licensed receivers.

At its headquarters, the Group implements recycling programs for at least 4 streams (paper, glass, aluminum and plastic), effectively manages any hazardous waste that may occur, such as toners, and disposes in approved alternative management systems waste such as waste electrical and electronic equipment (computers, monitors, etc.), batteries and accumulators and waste mineral oils.

Similarly, Concessions segment's companies, recycle all types of waste arising from the operation of the highway itself (waste mineral oils, accumulators, spare parts/iron scrap, green waste, etc.).

For the complete inventorying of waste from all projects, a calculation tool has been created, where the quantity and the management method per waste stream is completed by each project's Environmental & Energy Officer on an annual basis and sent to the Environmental Manager of each subsidiary in order to be evaluated and checked before being forwarded to the Group's ESG Strategy & Sustainable Development Division.

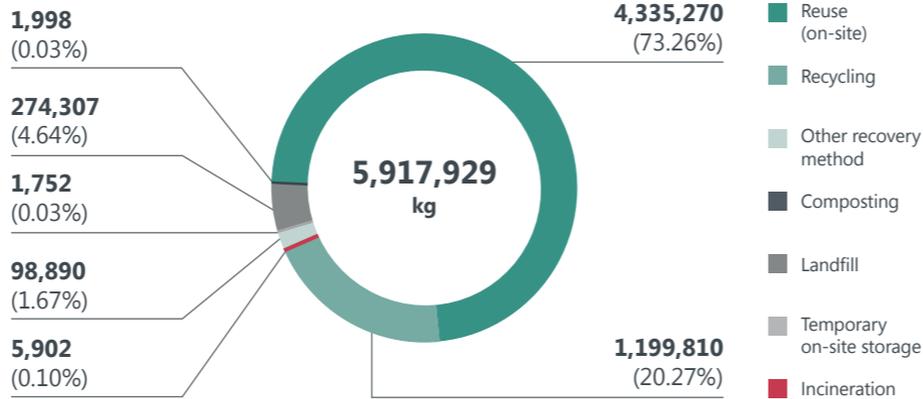
MANAGEMENT OF SOLID WASTE GENERATED BY THE GROUP'S OPERATION

From all waste (hazardous and non-hazardous) generated by the Group's operation facilities/projects under its own management such as the Headquarters, the activities of the Concessions and Renewable Energy segments and the Management of Mechanical Equipment, 89.5% was managed with recovery methods (R), marking a significant improvement compared to 2021 where the corresponding value was 67%, 10% was directed to disposal (D) and 0.5% remained in temporary storage, already achieving the short-term target set for 80% to be diverted from landfill.

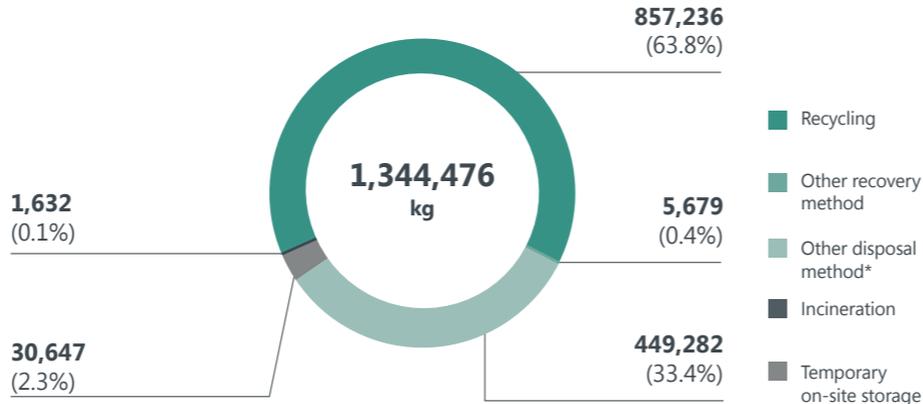
More specifically, 5,636 tonnes of non-hazardous waste and 863 tonnes of hazardous waste were forwarded for recovery and not disposed to landfill. The Group's waste management methods from its operations are shown in the following graphs.

The breakdown of waste by stream is shown in the graphs and tables in the [Annex](#).

Non-hazardous waste management methods



Hazardous waste management methods



* Physico-chemical treatment or R12

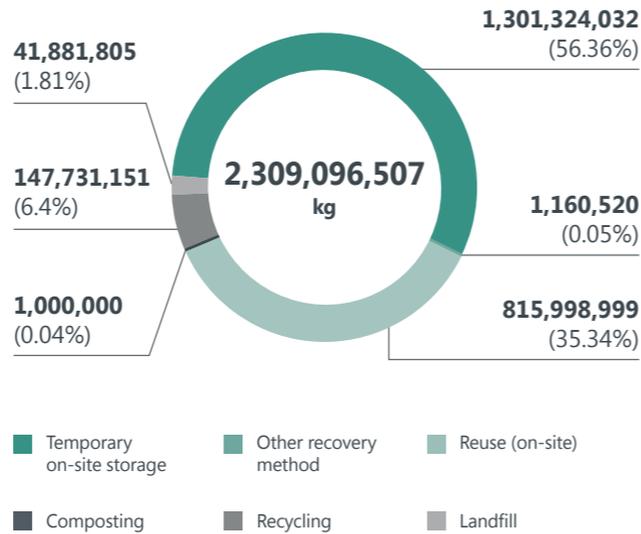


MANAGEMENT OF THIRD-PARTY SOLID WASTE

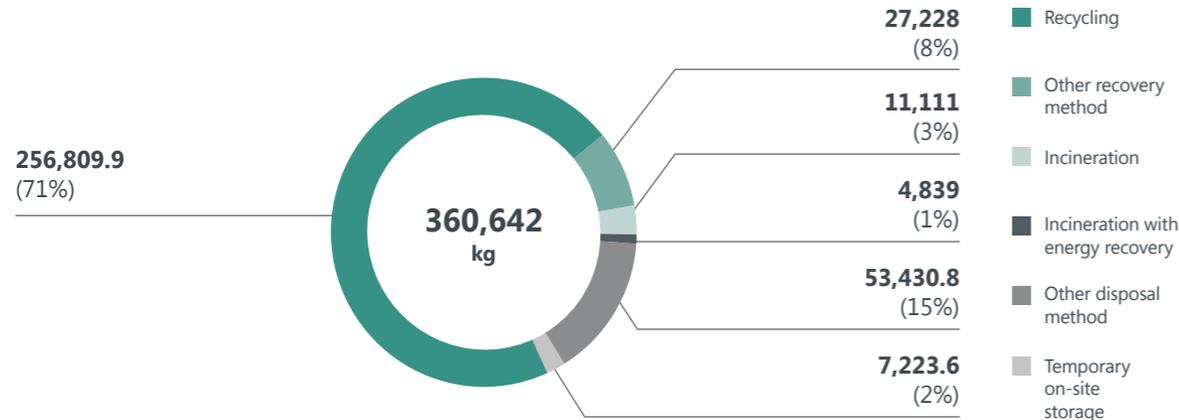
Waste managed by Group's companies and subcontractors

In addition to the waste generated from the companies' operation, the Group also manages large quantities of waste generated during the construction, operation and maintenance of projects on behalf of third-parties (e.g. construction segment projects). 42% of the total waste (hazardous and non-hazardous) managed by the Group or its subcontractors on behalf of third-parties was managed with recovery methods, 2% was disposed to landfill and 56% was temporarily stored.

Non-hazardous waste management methods

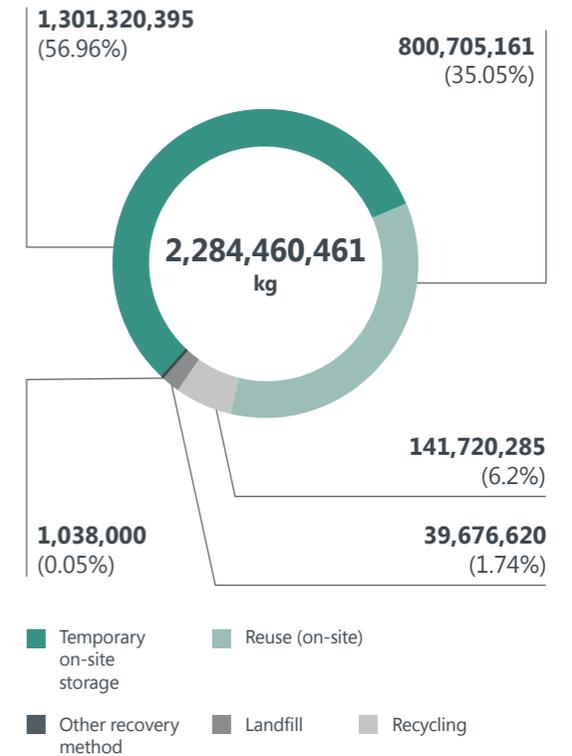


Hazardous waste management methods



On the construction sites, integrated management of hazardous and non-hazardous waste is applied, in accordance with environmental management systems. The majority of waste is led for recovery (R) and not for disposal (D). A typical case is that of excavation products, which are intended to be reused in the project as such or after processing in suitable facilities (screening and crushing machineries), thus reducing the need for the supply of aggregates. Wastes that are not reused, are made available for recovery in approved alternative management systems. The management of demolition materials is similar, where the demolition phases are planned taking into account the building materials of the infrastructure to be demolished and their possible use. Specifically, in 2022, 41% of excavation, construction and demolition waste (ECDW) was reused by applying recovery (R) methods, of which 35% was reused on-site, 2% was disposed (D) and 57% was temporarily stored on-site.

Management of ECDW waste



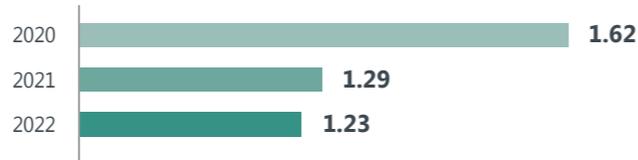
Water management

In order to maximize water savings, companies manage water and apply reuse practices, where possible, after appropriate wastewater treatment. Irrigation is regulated by centralized electronic systems that are programmed according to climatic conditions in order to avoid wasting water resources. In addition, qualitative, chemical and microbiological analyses are carried out at regular intervals to check the water quality.

The Group's companies use water mainly for cooling, sanitation, irrigation, water supply, fire-fighting, washing (road surfaces and/or vehicles), wetting, waste treatment, etc. Total water withdrawal in 2022 at Group level amounted to 1,287ML, of which 9.2% was water that was recycled or reused. Water consumption at headquarters was 0.705 m³/m².

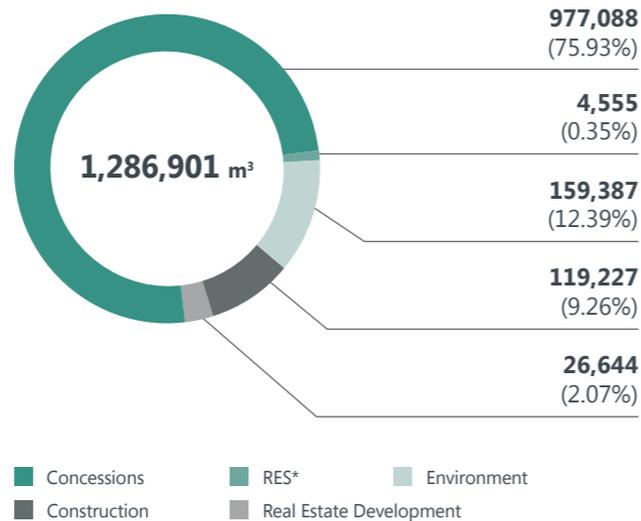
In 2022 water withdrawal per turnover (m³/th. €) was reduced as shown in the following chart which illustrates the continuous effort to reduce and protect this natural resource.

Specific water withdrawal (m³/th. €)



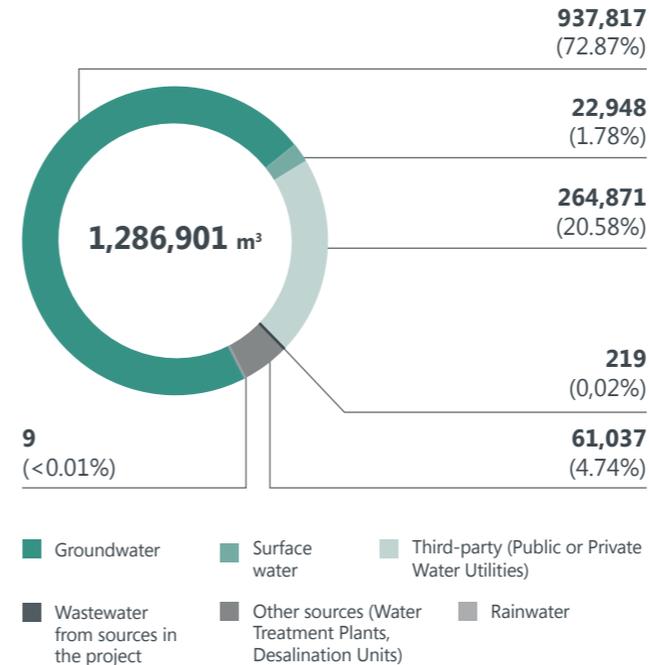
In particular, water abstraction is shown below by activity segment, which shows that the main water use concerns the Concessions segment:

Water withdrawal per activity segment

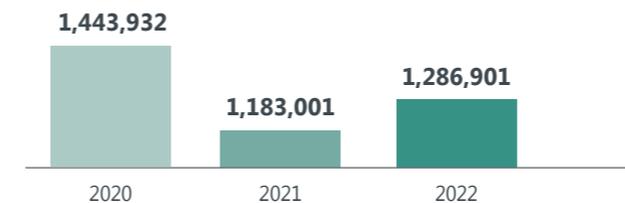


*The RES segment includes the data of parent company ELLAKTOR S.A.

Water withdrawal per source (m³)



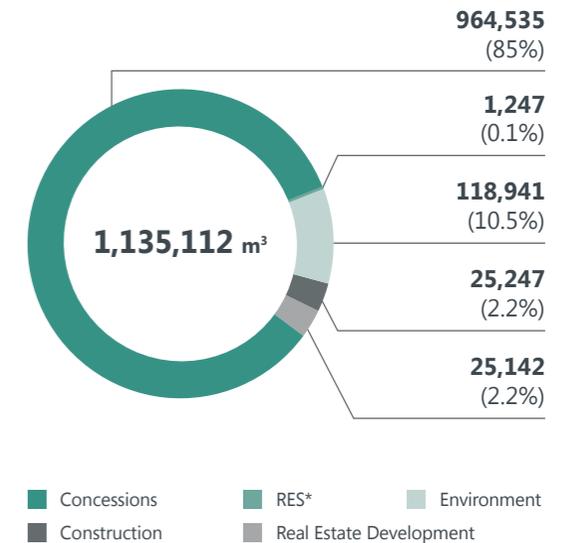
Total water withdrawal (m³)



The analysis of water withdrawal by water source and by water quality according to the concentration of total dissolved solids (TDS) is illustrated in the [Annex](#).

Total water consumption by the Group's activities for 2022 amounted to 1,135,112 m³ and is presented by activity segment in the following chart:

Water consumption per activity segment (m³)



*The RES segment includes the data of parent company ELLAKTOR S.A.



In the Concessions segment, water saving practices are implemented such as irrigation scheduling for maximum utilization (watering at night), immediate repair of faults - leaks, systematic network maintenance, re-use of water from biological treatment plants by 5% compared to the water withdrawn for limited irrigation at the rest area of highway. In particular, in MOREAS, water is used mainly for irrigation, firefighting and water supply. Water is used mainly to cover the irrigation needs of the island's planting, as well as the embankments and the junctions of the highway, which vary depending on the weather conditions, and the plants' growth and type. In order to monitor the quantity of water withdrawn, a non-zeroing volumetric water meter has been installed in each bore hole, the readings of which are recorded on a monthly basis. These figures are compared with those of previous uses, in order to identify any unexpected changes. Monthly monitoring of consumption in combination with regular visual inspection and maintenance of the irrigation network ensure the minimization of losses due to leaks. Furthermore, at the pumping stations feeding the highway's integrated water supply network, pressure meters are installed, which provide the Control and Maintenance Center with real-time

information on any pressure losses or indication of the existence of any leaks. In addition, on an annual basis and in each bore hole, laboratory analyses are carried out to check for any changes in the chemical characteristics of the groundwater and to detect any tendencies for its degradation. Finally, the reuse of the treated effluent of the Wastewater Treatment Plants for irrigation of fenced and non-accessible green areas contributes to water savings.

In the Environment segment, HELECTOR implements consistently and over time measures for the conservation and rational management of water in its Waste Treatment Plants. Specifically, through the Leachate and Wastewater Treatment Facilities, it treats the leachate resulting from its operation and reuses it during the biological treatment of waste and/or for irrigation of areas of its facilities. It is worth mentioning that in 2022 the reduction in water withdrawal in the Environment segment amounted to 26% compared to 2021. The wastewater produced by the various processes of companies in the segment includes industrial wastewater and sewages. Due to the different pollutant loads of industrial wastewater and sewages, different treatment techniques are used before disposal to the final receiver, as specified in the plants' environmental terms. At the same time, frequent analyses are carried out on the quality of wastewater resulting from the operation of waste management facilities (Landfills, Waste Treatment Facilities, Wastewater Treatment Plants, etc.).

In the Construction segment, appropriate measures are implemented to reduce water consumption, such as:

- ▶ Reuse of treated water for machinery washing and for spraying construction sites and roads, in accordance with the project's environmental permit.
- ▶ Communication of environmental and energy flashes with specific themes on water management and conservation.
- ▶ Installation of specific signs in staff areas (toilets, kitchens, etc.), that outline best practices and instructions for employees to avoid wasting water.
- ▶ Rainwater collection and use.

With regard to the management of wastewater, in the Construction segment and with the aim of minimizing water pollution at the construction sites, wastewater management is carried out in accordance with the current legislation and the projects' environmental terms, while effluents' chemical analyses are carried out at regular intervals, where required. In projects where there is a repair workshop for vehicle, effluents from the vehicle service ramp are collected and treated as specified in the project's environmental permit and then forwarded for final disposal or reused for water-spraying. In addition, in the concrete manufacturing plants, suitable slopes and ramps have been constructed

so that the effluents can be discharged into sedimentation tanks and the wastewater can then be reused.

In the Real Estate Development segment and specifically in the Smart Park Commercial Park, through the installation of the biological treatment plant, the treated municipal wastewater resulting from the operation of the commercial park is used for under-ground irrigation of the public green areas of the park, through a network of underground pipelines, resulting in 71% of the water being reused. Appropriate signs have been placed at all points in the commercial park that are irrigated with treated water.

Management of raw materials and products

ELLAKTOR Group is committed, through its Environmental & Energy Policy, to the raw materials and natural resources' rational management and conservation, and plans actions to achieve sustainable management and adequate use of these resources by implementing relevant procedures through the Environmental Management Systems.

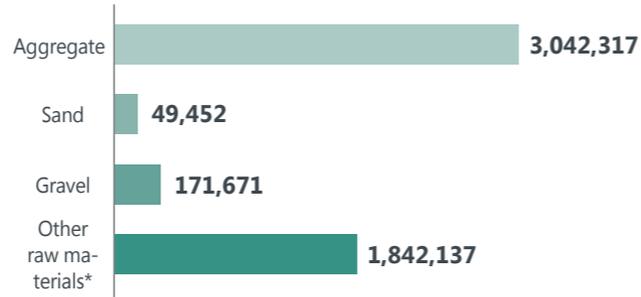
Circular economy practices are applied through the Environment segment, and rational waste management, separation and utilization of recyclable materials, production of alternative fuels and energy recovery of biogas produced in landfills are achieved. This reduces the amount of waste produced, increases recycling and reuse, and saves raw and other materials.

Significant quantities of raw and other materials are consumed through the construction segment, in projects' construction, so measures are taken to reduce these quantities, mainly through the reuse of excavation waste, thus saving significant quantities of aggregates.

The Group's objective is to review its procurement policies and procedures in order to select products with a higher percentage of renewable and recyclable materials.

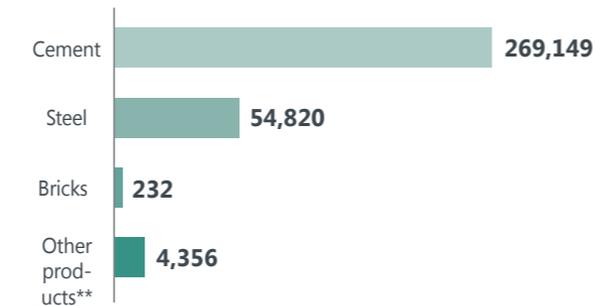
The following charts show the consumption of basic raw materials and products for the year 2022.

Total quantity of basic raw materials used: 5,105,577 t



*cement, topsoil, clay, gravel, filter zones, asphalt mixes, quarry products, soils

Used products: 328,557 t



**paving slabs, curbs, cobblestones, chemicals, lime



Protection of Biodiversity & Ecosystem

The Group undertakes initiatives aimed at protecting biodiversity, in compliance with legislation and environmental requirements, as well as the environmental management procedures applied to projects in high environmental value areas.

The Group takes into account the specific environmental requirements of the projects or activities in or near biodiversity-sensitive areas and monitors protected species (flora and fauna), as indicated in the approved environmental terms. Indicative measures taken are:

- ▶ Positioning of projects at a sufficient distance from habitats e.g. clusters of shrubs and trees, broad-leaved or coniferous forests, streams, lakes, buildings (used or abandoned), when suitable for shelters.
- ▶ Recording and mapping of land use in the wider project area and identification of areas with any protected species (flora and fauna) and species at risk.
- ▶ Conduct a wildlife survey of sections with flooded ditches and river crossings prior to commencing work.
- ▶ Avoidance of interference with river regulation.
- ▶ Installation of appropriate fencing to protect local fauna and flora and special fencing to prevent wild and stray animals from entering the highway.
- ▶ Limiting vegetation damage and landscape intervention to the extent strictly necessary.

- ▶ Reforestation of corresponding areas in the areas of intervention of the projects, after the completion of the works.
- ▶ Collection and storage of excavated soil and soil layers containing plant soil, for reuse in environmental restoration work.
- ▶ Avoiding activities, especially during sensitive periods such as nesting or bird breeding periods.

- ▶ Implement bird monitoring programs during all phases of construction of projects in Natura areas.
- ▶ Immediate transport to a local care center if an injured animal is found.

According to the IUCN Red List of Threatened Species, the species recorded in the Group's activities for 2022 compared to 2021 are shown in the table below:

Biodiversity Indicators

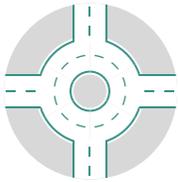
16

Operational sites owned, leased managed in, or adjacent to, protected and/or high biodiversity value areas

112,512 m²

Total size of all habitat areas (animals, plants or other organisms) protected

Total number - International Union for Conservation of Nature Red List of Threatened Species	2021	2022
Critically endangered	1	1
Endangered	6	5
Vulnerable	8	5
Near Threatened	11	4
Least Concern	118	11



According to the revised National List of the European Ecological Network Natura 2000 areas, a small part of MOREAS project passes close to or within

the Natura 2000 site "ORI ARTEMISIO KAI LYRKEIO" (GR2510004), which has been designated as a Special Protection Area (SPA). However, the largest section of the highway passing through the SPA is the Artemision tunnel, with a total length of 1,400m in each direction, where traffic is carried underground through a pair of one-way tunnels.

A Special Ecological Study (SES) has been prepared for the SPA, in accordance with the provisions of Article 6 of Directive 92/43/EEC, Article 10 of Law 4014 (Government Gazette 209A/21.09.2011) and Ministerial Decision 170225 (Government Gazette 135B/27.01.2014). Based on the SES (2016), where the Project's impacts on the conservation objectives of the GR2510004 SPA were assessed, no significant impacts on the species of the area's designation and delimitation have occurred, or to other protected species of Annex I of Directive 2009/147/EC or their habitats. Taking into account the location of the project, the size, and topography/ morphology of the area, the potential

impacts are either of low probability or negligible intensity. Based on the SES conclusion, the operation of the Concession Project does not substantially affect the structure and functions of the area, as the integrity and conservation objectives of the GR2510004 SPA or the coherence of the Natura 2000 network as a whole are not affected.

Apart from the GR2510004 SPA, the Concession Project is located outside the boundaries of areas of the national system of protected areas. However, sensitive environmental features are identified both in the vicinity and in the wider area of the highway crossing zone, mainly in areas of organized development and river banks.

In any case and depending on the subject matter, environmental requirements are fulfilled and appropriate measures are taken during the operation and maintenance of the Concession Project, such as traffic noise measurements, monitoring of ecological parameters, monitoring of air pollution, etc.

The Environmental Department in cooperation with the relevant Departments of MOREAS' Operations and Maintenance Division monitors and records anything that may be related to the presence of any protected wildlife species within the Concession Project boundaries.

Relevant locations (technical works/culverts) of potential wildlife passage are checked, a macroscopic check of potential nests is carried out, with emphasis on sensitive areas, and environmental parameters within the project boundaries are monitored.

No incidents involving protected species have been recorded during the project's operation to date. The underground passage of the highway through the Artemision tunnel (a pair of one-way tunnels) in the GR2510004 SPA contributes to this, as in this way the natural relief of the area is not disturbed and the free communication of fauna and, consequently, of protected species is not hindered.

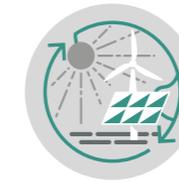
Regarding the flora within the project boundaries, MOREAS is constantly taking care for the plantations maintenance. The existing flora along the highway compensates and improves the green balance, while the selected species are in harmony with the endemic species without hindering their spread or acting in competition.

On the Moreas highway, maintenance, planting and irrigation works were carried out on the central islet of the highway, 136 km long, and on the embankments and interchange branches of the 580 km long highway.

In Attiki Odos, landscape management is based on the harmonization of the highway with the wider environment. In 2022, 800,000 trees and shrubs and 78,000 square meters of turf were maintained.

With regard to the protection of local fauna, a special fence has been installed to prevent wild or stray animals from entering the highway, while provision has been made to prevent passing birds from hitting the glass noise barriers by placing special stickers, based on international standards. ATTIKI ODOS and ATTIKES

DIADROMES collaborate with "ANIMA" association for the care of wild animals and birds that happen to enter the highway. It is worth mentioning that in 2022, these companies allocated €1,000 to the "ANIMA" Wildlife Care Association, while the Hellenic Animal Welfare Society (Filozoiki) was allocated €6,400 to support the organization in the collection and protection of stray and abandoned animals and the care of injured animals.



Each wind farm has an environmental management plan, which is implemented both during its construction and its operation. In

addition, for all wind farm construction projects, it is foreseen to carry out reforestation of corresponding areas or equivalent forestry works.

Specifically, in 2022, in the context of the wind farms construction, the following projects were completed, which were included in the approval of the respective environmental terms and in the respective informative actions of the competent forestry authorities:

- ▶ In the Region of Epirus, in parallel with the operation of the wind farms Kasidiaris I and Kasidiaris II, reforest-

ation of 21 hectares was carried out, with the planting of 83,000 plants and hydroseeding of 73 acres.

- ▶ In the Peloponnese region, forest vegetation restoration works were carried out in five dismantled squares in the operating wind farm of Kalogerovouni-Poulos, covering an area of 12.5 acres, as well as in three dismantled squares in the operating wind farm of Rachi Gioni – Gropes, covering an area of 5 acres.

In order to reduce the environmental impacts from the wind farms construction and operation and taking into account that some of the Group's RES projects are located within Natura 2000 sites, in a Special Protection Zone (SPA) or Special Area of Conservation (SAC), or near an area with important avifauna, the Group proceeds, where feasible, to modify the initial design of the wind farms, which includes:

- ▶ Selection of the appropriate type of equipment for optimal utilization of the wind potential, with the installation of fewer wind turbines in order to reduce the environmental footprint.
- ▶ Undergrounding of all medium and high voltage cables, where possible.

- ▶ Using the existing road network to the extent possible, in order to minimize interference with the natural environment.
- ▶ Using new methods for the transport of large wind turbines, with the aim of reducing large road works (openings) in forest areas.
- ▶ Continuously assessing the design and removal of wind turbine sites when they are likely cause problems in avifauna (e.g. Orpheas Eptadendros wind farm).
- ▶ Interrupting construction works during critical periods for the avifauna (e.g. reproductive period etc.) in cooperation with the competent authorities.
- ▶ Installation of bird strike prevention systems.

At the same time, a bird monitoring program is implemented in significant biodiversity areas (e.g. Natura sites) during all phases of the project's construction (preparation, construction and operation). In all projects where a bird monitoring program is in place, annual reports are prepared and submitted to the competent authorities for evaluation.

Indicatively, with the completion of the Orpheas Eptadendros wind farm in Thrace, at the boundary of GR005 high-importance area for birds, a DTBird monitoring and strike prevention system was installed in all wind turbines. The system detects the birds at a distance proportional to their size and records their movements on video, which is stored in a database.

When the bird enters a predetermined area, the system emits a warning noise and then a second louder alert if the bird does not change its flight path. By assessing the risk, the system is able to cease the wind turbine's operation and restart it once the bird flies away (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 they have emerged through the systematic consultation processes followed by the Group.



RES projects in Natura protected areas and important bird areas

Municipality	Location	Project type	Natura (SPA, SAC)		
Alexandroupoli	Magoula Kazakou Diplon	W/F	SPA: GR1110010 SAC: GR1110003	GR005	
Arrianes - Alexandroupolis	Orpheus - Eptadendros	W/F	-	GR005	
Argos - Mycenae, Tripoli	Lyrkeio	W/F	SPA: GR2510004	GR118	
Grevena	Smixiotikos River	SCHP	SPA: GR1310004	GR050	
Zitsa and Pogonio	Kasidiaris 1 Kranies - Karavamia - Elatos	W/F	-	GR072	
Kefalonia	Monolati - Xeroliba	W/F	SPA: GR2220006	GR085	
Kefalonia	Mount Agia Dynati	W/F	SPA: GR2220006	GR085	
Lesvos	Skamniouda – Ypsoma Pachys	W/F	SPA: GR4110010	GR134	
Lesvos	Skamniouda – Ypsoma Madera	W/F	SPA: GR4110010	GR134	
Monemvasia	Mali Madi Metamorfoseos	W/F	-	GR123	
Monemvasia	Kalogerovouni - Poulos	W/F	SPA: GR2540007 SAC: GR2540001	GR123	
Monemvasia	Gkropes - Rachi Gkioni	W/F	-	GR123	
Pogonio	Kasidiaris 2 Agriachladia - Pr. Ilias - Petra Chaidos - Diavolorachi - Pr. Ilias	W/F	-	GR072	

W/F: Wind Farm

SCHP: Small-scale hydroelectric project

*Monitoring of avifauna



The company HELLENIC QUARRIES operates a quarry at Mavra Vouva in the Municipality of West Achaea, which is protected by the International Ramsar convention, and is included in the European Network NATURA 2000 (Special Areas of Conservation and Special Protection Areas for Birds) with codes GR2320011 (SAC – wetlands of Kalogria, Lamia and Strophylia forest) and GR2330007 (S.C.I. - coastal sea zone from Kyllini cape to Tubi – Kalogrias). The company Hellenic Quarries S.A. is active in the quarry site in accordance with the provisions of article 53 of Law 4030/2011, as amended by article 90 of 4313/2014, for the formation of the landscape and the restoration-reforestation of the quarry site. The aggregates extracted during the above landscaping works are available for a) restoration - reforestation works and b) the execution of public works with a concession contract and public works of national importance by decision of the Ministers of Development and Competitiveness, Infrastructure, Transport and Networks and Environment & Energy. For the protection of biodiversity, there is permanent monitoring of the area, while the following actions are carried out:

- ▶ Monitoring and recording of the avifauna's patterns and the otter population in the area of the quarry and within a radius of 700 meters from its outer boundaries, with submission of the results to the Ministry of Environment and Energy.
- ▶ Reforestation and tree planting on the basis of studies approved by the competent authorities.

- ▶ Creation of cornices (ledges) and caves on the slopes, to attract wildlife / predators and nesting. This procedure is carried out in consultation with the Kotychi - Strofylia Wetlands Management Body.

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

- ▶ "Accompanying projects and rehabilitation works in 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.
- ▶ Forest vegetation restoration of the non-functional disturbed areas of the "West Askio" wind farm modified roadway, as well as additional plantings.



SOCIETY

ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS



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100 SOCIAL RESPONSIBILITY

ALIGNMENT WITH THE PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT





Main achievements



The Group participated in the Bloomberg GEI index rating for the first time, achieving a score higher than the inclusion threshold



Establishment of a Donations-Sponsorships Committee and introduction of an annual social investment plan



Adoption of Diversity, Equity & Inclusion Policy



Permanent and long-term cooperation with Charitable Partners



Launch of cooperation with the Hellenic Institute for Occupational Health and Safety (ELINYAE), to strengthen the culture of occupational Health and Safety



Signing U.N. Women's Empowerment Principles (WEPs), a joint initiative of UN Global Compact and UN Women

Material Topics

Economic value generation and distribution

Employees' and business partners' health, safety and well-being

Employment practices, training and development

Infrastructure safety and user experience

Care for the prosperity of local communities

Equitable and inclusive working environment and human rights

Our performance

44%

female employees at head office

80%

employees & 81% executives from the local community

38,105

hours of training

279

internal H&S audits

Doubling

of volunteering hours compared to 2021

€3.7 million

investments in Society

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. Having set as its main priority the well-being and development of its human resources, the Group plans and adopts a series of actions and activities aimed at the continuous development of its employees’ knowledge, as well as at ensuring a healthy and safe working environment, with the aim of achieving zero accidents.

ACTION PLAN

In order to achieve the strategic objectives, set for its employees’ development, the Group has developed the following action plan

Design and implementation of a holistic improvement program for the well-being of the Group’s employees	▲
Online anonymous psychological support line	▲
Frequent events to develop relations between employees and their families	▲▲
Diversity, Equity & Inclusion Policy	✓
Program for the enhanced inclusion of vulnerable groups through recruitment	▲
Design and implementation of Human Rights due diligence	▲
Women’s Empowerment Program	▲
Leadership training program for managers	▲
Application of “360 Feedback” evaluation	▲▲

▲ Short term target (1-3 years) ▲▲ Medium term target (4-7 years) ▲▲▲ Long term target (8-10 years)

Human Resources

ELLAKTOR Group’s human resources are its most significant competitive advantage. The Group employs more than 7,300 employees, executives with high level scientific training and experienced technical staff. The Group’s objective is to continuously improve the management of its human resources, following best international practices and applying management and monitoring systems per Company and per Division.

In 2022, the Human Resources Division continued to work dynamically to fill vacant positions at the administrative and site level, selecting the most suitable executives, mainly from the market, but primarily fully exploring the potential for the existing staff development and growth.

At the same time, it reviewed and further developed its existing procedures, in line with the approved Human Resources Management Policy, and the provisions of Law 4706/20, placing emphasis on transparency, equal opportunities and the more efficient Group operation.

Employment

At the end of 2022 (31.12.2022) the Group’s employed personnel numbered 7,329* employees 99% of the employees were on full-time contracts and 75% were on indefinite-term contracts. It is noted that the majority of employees (85%) worked at the Group’s construction sites and individual projects, while only 15% were employed at the Group’s headquarters.

The company’s policy is to employ mainly staff with permanent contracts. However, from time to time, fixed-term employees are hired to cover exceptional needs for the implementation of the company’s projects.

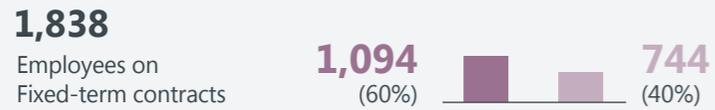
It should be noted that the majority of the work is performed by the Group’s employees, while at the end of 2022 (31.12.2022), 396 employees were employed, through subcontractors, in Group’s activities.

It is noted that the Group’s companies are staffed primarily with personnel from the local community. Indicatively, 80% of the Group’s employees and 81% of its executives come from local communities.

* The data refer to the activities of ELLAKTOR Group companies in Greece, Germany, Cyprus, Qatar, Romania, and Jordan, including employees on a daily salary, as well as employees employed in joint ventures in which Group companies own more than 50% and/or exercise management control.



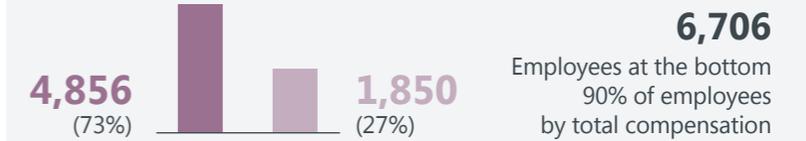
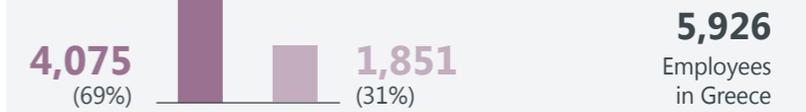
ELLAKTOR GROUP EMPLOYMENT DATA



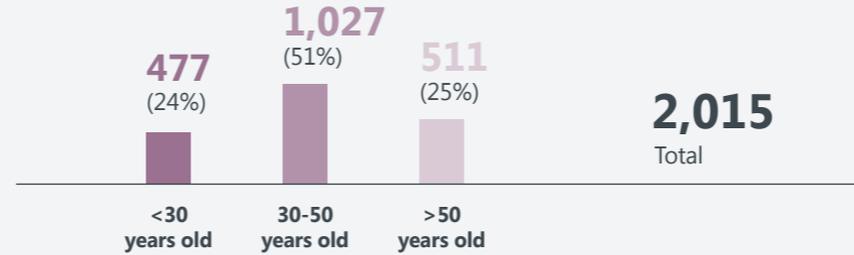
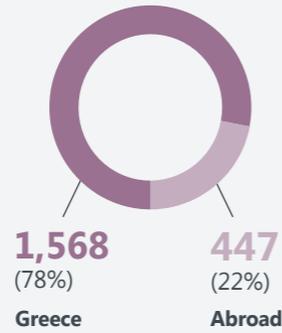
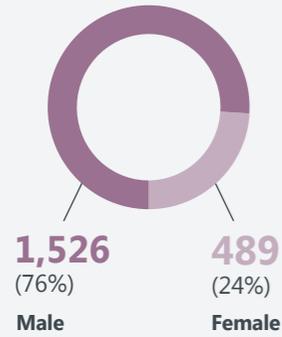
Employees per age group

<30 years old	30-50 years old	>50 years old
868 (12%)	4,255 (58%)	2,206 (30%)

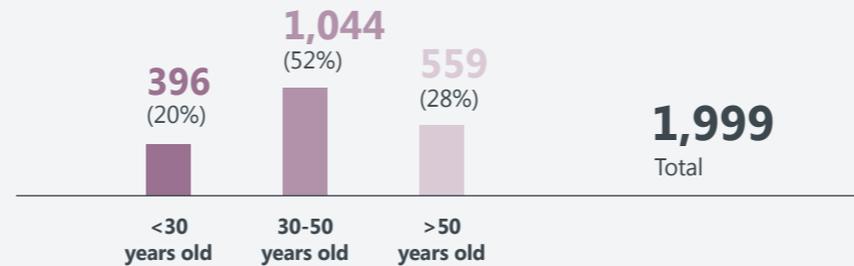
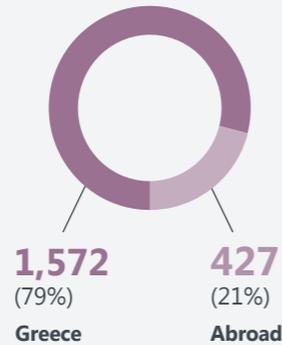
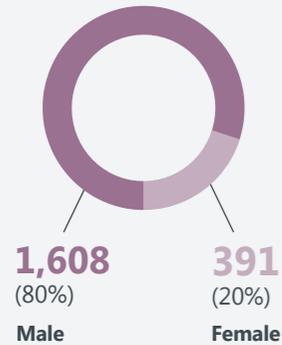
	Total	<30 years old	30-50 years old	>50 years old
Full-time - Indefinite Term	5,436	402 (7%)	3,264 (60%)	1,770 (33%)
Part-time - Indefinite Term	54	6 (11%)	33 (61%)	15 (28%)
Full-time - Fixed-Term	1,822	457 (25%)	949 (52%)	416 (23%)
Part-time - Fixed-Term	17	3 (18%)	9 (53%)	5 (29%)
Employees in Greece	5,926	654 (11%)	3,440 (58%)	1,832 (31%)
Employees abroad	1,403	214 (15%)	815 (58%)	374 (27%)



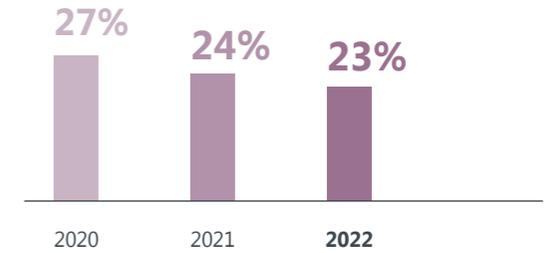
Employee New Hires



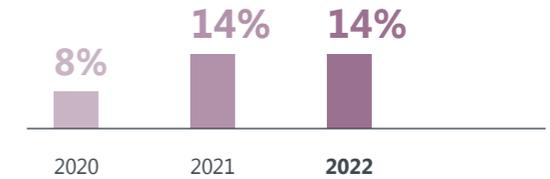
Employee Turnover



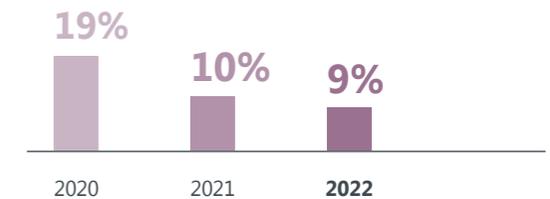
Employee turnover rate



Voluntary turnover rate



Involuntary turnover rate



Compared to 2021, the total number of employees remained in the same levels, while the percentage of female employees increased from 26% in 2021 to 27% in 2022, and the female employees working outside the Group's headquarters was 24% compared to 22% in 2021. Regarding new employee hires per age group, it is worth mentioning that in 2022, the percentage of recruitment of employees over 50 years old increased to 25%, compared to 21% in 2021. Finally, there was a significant decrease in the percentage of employees' turnover in the under-30 age group, which reached 20%, compared to 43% in 2021.

Note: Turnover rates have been calculated using the number of employees who left the organization and the average number of employees for the year.

Attracting and Retaining Employees

The Human Resources Division designs and implements targeted actions for employees' retention and new talent attraction, contributing substantially to the improvement of the Group's overall performance and sustainability.

EMPLOYEES PERFORMANCE EVALUATION

The Group has adopted and implements a Performance Evaluation System tailored to its needs and specificities. This system, which has been designed by the Human Resources Division, concerns the evaluation of specific skills and behaviors that the Group's employees should demonstrate in their daily work.

The performance evaluation process is used to record and utilize the skills of the Group's employees. In addition, a structured two-way communication process is created, where the employee can express and be informed about their development and progress.

The training plan developed for the employees under evaluation, is based on the information returned from the evaluation process.

Employees are informed of the start of the

process by their Managers/Supervisors, who have been trained in this process by the Human Resources Division.

In 2022, a current year performance evaluation was conducted for a specific number of employees, based on their functional unit and hierarchical level.

Employees of the Group and its subsidiaries in Greece participated in the evaluation, apart from the companies ATTIKES DIADROMES and MOREAS which implement their own employee evaluation system.

In 2022, a total of 2,149 Group employees (1,280 male and 869 female) were evaluated, i.e. 29% of all employees. The employees selected to take part in the evaluation process were the employees at the Group's headquarters, as well as managers and supervisors at construction sites and production units. The selection of the specific groups to be assessed was based on the nature of the job roles, while the employee skills evaluated included, among others, effectiveness, subject knowledge, problem solving and decision making, adherence to Health & Safety rules, leadership and communication.





EMPLOYEE REMUNERATION AND BENEFITS

The Group aims for a uniform remuneration and benefits system, ensuring, on the one hand, at least the legal remuneration as a minimum and, on the other hand, the attraction and retention of suitable personnel, competitively paid. As part of the Group's principles and the Human Resources & Human Rights Policies it has adopted, the aim is to ensure that pay is equal between people with equivalent qualifications and performing similar work, without any discrimination. The Group's policies on remuneration practices are approved by the Group CEO and communicated to all employees.

The Group participates in remuneration and benefits surveys and obtains relevant data from the market, in order to assess the competitiveness of the total remuneration of its employees. The aim of this process is to propose corrective actions to improve employee retention and pay competitiveness, when differences are identified. In 2022, the Group reviewed the level of employee remuneration and benefits in order to make them competitive with the market, normalising any discrepancies.

It is worth mentioning that in the Group's companies in Greece, 97% of employees are

paid more than the county's minimum wage.

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 protected members are also entitled to participate.

The Group complies with labor legislation on maternity and childcare issues, as well as on retirement issues.

In addition, the Group offers voluntary benefits and other facilities to assist employees in their work. All benefits are defined by individual policies.

In the same context, Group companies voluntarily offer a range of benefits, including:

- ▶ Company car, fuel card, toll station e-pass and mobile phone, depending on the needs of the

position.

- ▶ Monthly kindergarten allowance to parents of pre-school children.
- ▶ Free transportation by company bus, during arrival and departure hours from the Group's headquarters and certain projects for employees' convenience.
- ▶ The children of the Group companies' employees have the opportunity to stay in children's camps during the summer period, thus facilitating working parents.

Finally, in recognition of the utmost importance of education for the future of young people, ATTIKI ODOS has established an annual scholarship for its employees' children who stand out with their performance.



The Group aims for a uniform remuneration and benefits system, ensuring, on the one hand, at least the legal remuneration as a minimum and, on the other hand, the attraction and retention of suitable personnel, competitively paid.



WORK-LIFE BALANCE AND EMPLOYEE WELL-BEING

Ensuring its employees' health is a strategic objective for the Group. To this end, it has designed a comprehensive well-being program, which includes actions such as: on-demand seminars for employees' well-being and mental health (nutrition, exercise, etc.), food corners with healthy snacks and fruit, operation of a gym at headquarters, participation in sports events and systematic educational, informative and entertaining events. In the context of the launch of the program, at the beginning of 2023, on the occasion of World Health Day, a campaign was held to inform the employees of the Group's headquarters about the benefits of a healthy diet.

Furthermore, the Group participates in sports activities for its employees, with the aim of promoting teamwork and strengthening their mental and physical health.



The Group invests in the continuous qualitative upgrading of its human resources' skills.



EMPLOYEE SELECTION AND TALENT ATTRACTION

The process of searching for and finding potential employees can be done either internally or externally.

During the internal staffing process, the internal vacancy announcement is posted on the Group's internal portal, in order to inform employees about the possibility of internal movement.

During the external recruitment process, the job opening is posted on the Group's means of communication with the external public and through third-parties, competent partners.

The Group continued its student employment programs, providing training opportunities to those interested, while creating permanent employment opportunities for young scientists. In support of the above, the Human Resources Division participated in events and activities, such as the 12th National Engineering Competition and organized student visits to the Group's construction sites.

In the context of the current HR management strategy, emphasis is placed on the development, promotion and enhancement of employee knowledge, which is also reflected in the Group's employees mobility figures. More specifically, in 2022, 691 employees (568 males and 123 females) moved to other positions within the same segment and 87 employees (65 males and 22 females) moved to another segment. Finally, it is worth mentioning that of the 73 employees who were promoted, 29% were female employees.

Training and Development of Employees

The Group invests in the continuous qualitative upgrading of the skills of its employees.

The purpose of the training is to enhance technical knowledge and expertise, provide on-going education, cultivate a uniform corporate culture and perception of the Group's objectives and principles, as well as deepening the basic thematic modules that have been identified.

The close monitoring of the needs for training, information and further development of employees competencies, together with the functional units and the Human Resources Division, are of great importance for the development of each employee and for their ability to meet their duties, as well as their ability to keep up with industry and market developments. In this context, the Group encourages employees to participate in conferences in order to follow developments and, at the same time, through the use of the E-learning platform, aims at the immediacy and high participation enabled by distance learning.

Specifically, for the members of the Board of Directors, the Human Resources Division formulates and proposes a Training Program

annually, in cooperation with the Nomination & Remuneration Committee, in accordance with the Group's Training Policy for Board members and Managers and undertakes its implementation, once approved.

In 2022, a total of 38,105 training hours were carried out (27,873 for males and 10,232 for females). It is estimated that the average hours of training per employee amounted to 5.20 hours (5.21 for males and 5.18 for females), presenting a decrease compared to 2021, where the average training was 6.54 hours (7.16 for males and 4.76 for females).

The decrease in average training hours is due to a decrease in Health & Safety training hours (see in more detail the section "[Health & Safety training](#)"). However, for female employees, the average training hours were increased by 9% compared to 2021. It is worth mentioning that in the operation and maintenance projects of the Egnatia Odos, in the Construction segment, numerous training activities were carried out on Health & Safety and Environment & Energy issues, achieving an average of 21 hours of training per employee per year, above the target of 20 hours set by the Group for all its activities.

It should be noted that, 7% of the training hours conducted in 2022, were for employees in managerial positions, while 93% were

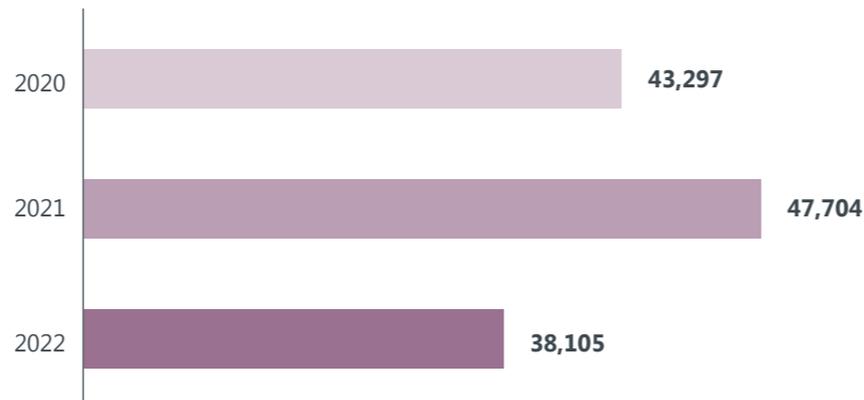
for employees in non-managerial positions.

The total expenditure on employee training for the year amounted to €93,942.

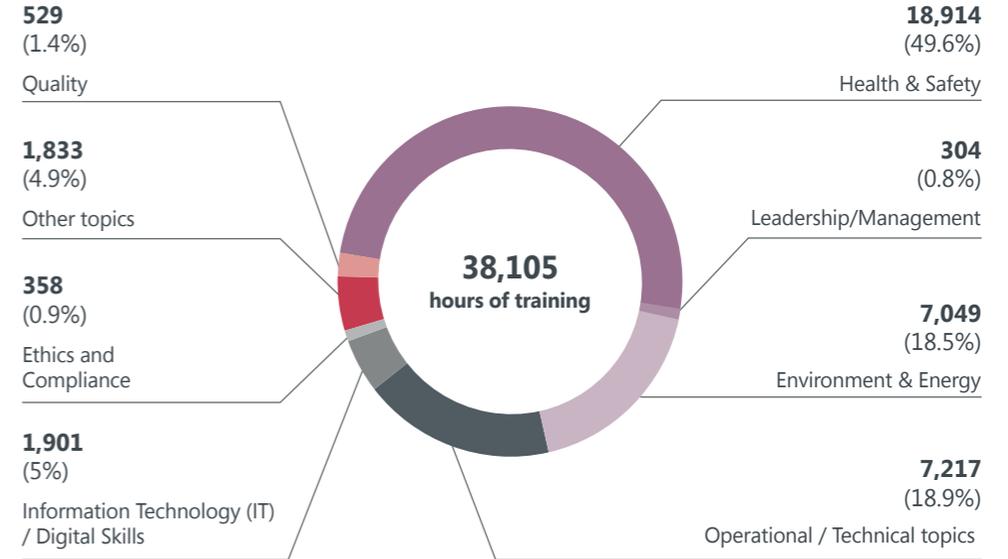
ELLAKTOR S.A.: Significant increase in employees' average training hours

In 2022, the employees of ELLAKTOR S.A. participated in various educational activities aimed at further developing their knowledge and skills. In ELLAKTOR S.A. the average training of employees amounted to 8.42 hours, presenting an increase of 87% compared to the previous year. Specifically, the average training for male employees was 4.3 hours while for female employees 14.1 hours.

Training hours



Trainings per topic



Increase in the percentage of training hours in 5 of the 8 thematic topics.

In 2022, the percentage of training hours presented and increase in 5 of the 8 thematic topics. More specifically, there was a 73% increase in the number of training hours in Leadership & Management, 300% in Informatics & Digital Skills, 138% in Ethics & Compliance and 52% in Environment & Energy.

Health & Safety at work

HEALTH & SAFETY POLICY

The concern for Health & Safety of all human resources employed by the Group is a key part of its broader business policy and philosophy, as one of the most important factors in ensuring its growth.

In this context and in line with the Group's broader approach, the Management, through the new [Health & Safety Policy](#), is committed to complying with the applicable national and European legislation and all other requirements, to providing optimal Health & Safety conditions in the workplace and to continuous compliance and improvement of the Health & Safety Management System with the purpose of eliminating hazards and reducing risks associated with Health & Safety at work.

In addition, the Management is committed to the following:

- ▶ Consultation and participation of employees and their representatives through continuous discussion and two-way communication in the design and revision of Health & Safety Management Systems.
- ▶ Preventing and minimizing accidents

and occupational diseases through the assessment and evaluation of occupational risks and taking appropriate measures.

- ▶ Continuous training and information of the Group's human resources on issues related to Health and Safety at work.
- ▶ Protection of the immediate and wider environment, as well as protection of third-parties, in the areas where the Group operates.
- ▶ Using tools to encourage all employees at all hierarchical levels to report dangerous actions and situations and near misses without fear of disciplinary action or other retaliation, so that appropriate preventive measures are taken on time to avoid accidents.
- ▶ Promoting the physical and mental health of all employees.

The Group aims to minimize and eliminate accidents in all its operations, through the prevention and assessment of occupational risks, the adoption of appropriate measures and the implementation of new Health & Safety tools at work.

HEALTH & SAFETY MANAGEMENT SYSTEM

In the context of creating a stable, healthy and safe working environment, the Group applies certified Health & Safety Management Systems, according to the international standard ISO 45001:2018, which are presented in detail in the table of certified Systems

in the [Governance](#) chapter. All Group companies have developed and implement Health & Safety Management Systems in accordance with the above standard, whose procedures apply to all Group employees.

As part of its operations and due diligence processes, the Group identifies and assesses a number of risks, such as potential injuries at work, possible occupational diseases, emergency situations (pandemic COVID-19, fire, earthquake, floods, chemical gas leakage, etc.), possible failure to comply with legal and other requirements in a timely manner, failure to identify the occupational hazard (unsafe way of performing work, or 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 Group employees or external partners, possible sanctions or defamation that may arise, possible exclusion of the Group from prequalification questionnaires for public or private sector projects. In order to manage and minimize the above risks, the Group has adopted a series of measures as detailed below.



The Group implements certified Health & Safety Management Systems, aiming to ensure a stable, healthy and safe working environment.

HEALTH & SAFETY ORGANISATIONAL STRUCTURE

In each project, depending on its size and nature, a Health & Safety Officer is appointed, supported by the central department of each subsidiary and supervised and guided by the Group's Health & Safety Division. At the same time, a Safety Engineer and a Coordinator are appointed for each project, according to the legislation. By the end of 2022, Health & Safety Officers had been appointed to all the Group's projects.

In the Group's projects and activities, an Occupational Health Physician is appointed, where required, to monitor and supervise the hygiene conditions of the employees, and a first aid team is appointed, depending on the size of the project. In 2022, the Occupational Medical Unit at the Group's headquarters strengthened its team with the physical presence of a health visitor on a daily basis, in addition to the presence of the Occupational Health Physician. Similarly, where required, an Occupational Health Physician is appointed also for subcontractors' employees.

COMMUNICATION AND CONSULTATION

Communication and consultation on Health & Safety issues is achieved through the tools of 15-minute meetings, incident investigation meetings, systematic meetings of Health & Safety Officers with the central Departments, monthly meetings of the companies' Health & Safety Managers with the Group's Health & Safety Division, as well as Health & Safety meetings held at project level.

Group companies offer employees the opportunity to participate in Occupational Health & Safety committees. Indicatively, there are 2 employee committees in AKTOR in the Thessaloniki Metro project, which deal with employees' rights and generally with Health & Safety issues at work. These committees are located on the Base Metro Line and the Kalamaria Metro Line. Also, as regards HELECTOR SA activity in Greece, there is an employee committee, while in the OSNABRUCK MBT project the percentage of employees who participated in Health & Safety committee was 75%.

The role of the Health & Safety committees is to:

- ▶ Ensuring compliance with the applicable legislation as well as compliance with the requirements of ISO 45001.
- ▶ Identification of potential hazards.
- ▶ Reporting of any changes in the workplace.
- ▶ Information on the potential hazards to health and safety and the measures needed to eliminate or reduce those hazards.

- ▶ Participation in actions on the preventive or protective measures to be implemented.
- ▶ Making proposals to the responsible officers – employers for the adoption of appropriate safety measures and reduction or elimination of accidents and hazards at source.
- ▶ Cooperation and support of the employer in working towards a safe working environment.
- ▶ Taking instructions and training on the measures to be taken.
- ▶ Taking care as far as possible of the safety and health of employees and of the safety and health of other persons affected by their actions, in accordance with the training and instructions they have received from their employers.



HEALTH & SAFETY MANAGEMENT PLAN AND WORA

A Health & Safety Management Plan and a Written Occupational Risk Assessment (WORA) is prepared for each project depending on the nature of the project, the intensity and hazards of the work.

The objective of the WORA is to identify and recognize hazards of all kinds, forms, types and causes, and to propose the necessary measures to reduce or eliminate them.

The risk assessment for the Group's projects/activities is prepared in such a way that its implementation will reduce the chances of occupational accidents or occupational illness in the Group's workplaces and takes into account the hierarchy of controls principles. Through the WORA, the following are carried out:

- ▶ Identification of the sources of hazards generated at work and assessment of the them associated with these sources using a specific methodology. The aim is to record the measures that should be taken to protect the health and safety of employees, taking into account the requirements of the current legislation.
- ▶ Perform risk assessment in order to

propose the most appropriate choice of equipment, structure, and layout of the workplace.

- ▶ Train all employees on these hazards.
- ▶ Check the suitability of the measures applied.
- ▶ Prioritize actions if, following an assessment, it is determined that further action is required.
- ▶ Ensure 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 foreseeable risks arising from the work and from the places where the work is carried out (fixed installations, changing workplaces, mobile or temporary workplaces).

HEALTH & SAFETY PERFORMANCE EVALUATION OF SUBCONTRACTORS

During the internal audits of the projects, the Group's subcontractors are randomly audited and evaluated on Health & Safety issues. Their accidents are recorded and investigated in collaboration with their Safety Officer on the project. Subcontractor employees also adhere to

the Group's internal procedures, apply the 15 inviolable rules and Health & Safety instructions given to them per project / facility and strictly follow the Written Occupational Risk Assessment of the project / activity.

ACTION PLAN

With the aim of preventing incidents and looking forward to strengthening the Health & Safety culture in order to achieve zero accidents, the Group has designed the following action plan:

Digitization of the "Safety Pass" tool for 100% of employees (training, certificate of suitability, legal documents) and for 100% of subcontractors' employees	▲
Development of a digital application for recording near-misses, unsafe conditions and acts, monitoring of corrective actions with an awareness campaign	▲
Safety Leadership Program	▲
Developing initiatives: Safety forum, Safety Champions, thematic awareness campaigns & rewarding good practices, in all the Group's projects and activities	▲▲
Creation of a Health & Safety Training Academy in collaboration with Institutes, Technical Universities and other Higher Educational Institutes	▲▲

▲ Short term target (1-3 years)

▲▲ Medium term target (4-7 years)

▲▲▲ Long term target (8-10 years)

HEALTH & SAFETY ACTIONS

The Group's Health & Safety Division, in collaboration with the Health & Safety Managers of each subsidiary and the Health & Safety Officers of the projects, took the following actions in 2022 in order to ensure and continuously improve the Group's performance in Health & Safety issues:

- ▶ In 2022, in the context of Health & Safety training activities, the Group launched an important collaboration with the Hellenic Institute for Occupational Health and Safety (ELINYAE). A pilot training activity took place in a project of AKTOR, in Thessaloniki Metro, over a group of 48 engineers (9% of AKTOR's engineers), aiming to raise awareness among employees on issues of communication, empathy, relationships' strengthening and Health & Safety culture reinforcement. The action continues into 2023 and 480 hours of training have been carried out.
- ▶ Issuance of monthly and special Health & Safety Flashes for the projects / facilities, with different topics

each time, depending on the needs that arise, for all employees' training, information and awareness. In 2022, 14 Health & Safety Flashes were issued and communicated by the Group's Health & Safety Division.

- ▶ Adherence to the implementation of 15-minute Health & Safety toolbox talks for employees prior to the start of work, during which Health & Safety issues associated with the day's work are discussed, with the aim of constant vigilance. In 2022, 17,562 fifteen-minute Health & Safety toolbox talks were held. This practice is also applied to the Group's subcontractors' employees. In particular, it is worth mentioning that the 15th Health & Safety rule, that the employee will not perform any work unless all Health & Safety rules are respected, is emphasized in these toolbox talks.
- ▶ Monthly Health & Safety Report (MHSR) to monitor the key Health & Safety performance requirements in the Group's projects / facilities. In 2022, 1,317 MHSRs were created and forwarded to the Group's Health & Safety Division.
- ▶ In 2022, 3,194 Group employees were re-trained on the 15 Inviolable Rules, through the introductory training of projects/facilities, with a total of 2,049 hours of training.
- ▶ Creation of Health & Safety e-courses on the

HR e-learning platform on issues of "Health and Safety" and "Health and Safety Instructions in case of Earthquake".

- ▶ Monthly Health & Safety meetings of the Health & Safety Division with the Health & Safety Managers of the Group's companies. The agenda of monthly Health & Safety meetings between the team of Project Health & Safety Officers, the central Health & Safety Departments and the Group's Health & Safety Division includes the presentation of accidents, their investigation, monitoring of compliance with internal procedures and exchange of best practices in Health & Safety at work.
- ▶ Review of the Written Occupational Risk Assessment of projects and Emergency Response Plan, due to ongoing developments.
- ▶ Recognizing the right of every person to access to safe and clean water and sanitary facilities, the Group's headquarters systematically carries out measurements for chemical and microbiological factors in the water supply. The results of the measurements are within the limits according to the applicable legislation. At the Group's facilities and projects, either connection to the network with new plumbing is installed, or approved drinking water coolers and approved chemical toilets are provided.

It is estimated that in 2022, the total expenditure on actions for the protection of health and safety of the Group's employees (e.g. for Health & Safety equipment, personal protective equipment, measurements / audits, actions taken also due to the COVID19 pandemic, etc.) amounted to €1,316,244.



€1,316,244

total expenditure on actions for the protection of health and safety of the Group's employees

INTERNAL AUDITS

The central Health & Safety Departments of the Group’s companies conduct internal audits of the Group’s projects and activities, including those of its subcontractors, based on the annual program with the team of certified internal auditors (according to IRCA), as part of the Health & Safety Management Systems (HSMS) implementation, through which:

- ▶ any deviations from the legislation, the HSMS and internal procedures are identified and the necessary corrective actions are planned and implemented to remove them; and
- ▶ confirms that the HSMS are operating sufficiently and that there are no Health & Safety hazards that have not been identified and/or addressed.

In 2022, 279 Health & Safety audits were carried out in 116 Group projects. The number of audits carried out across all Group companies

increased by 147% compared to 2021, confirming the commitment to continuous internal control and compliance with the applicable legislation and the Group’s internal Health & Safety procedures.

In 2022, the Group’s internal Health & Safety auditors who attended the specialized course “Occupational Health and Safety Auditor / Lead Auditor” (IRCA certification) were increased by 20% compared to 2021. It should be noted that the Group aims to further increase the number of audits carried out, both in its operations and main subcontractors.



279

Health & Safety audits

ACCIDENT MANAGEMENT

In the event of an accident involving an employee of the Group or a subcontractor/supplier at a Group site, the Emergency Plan is implemented in accordance with the HSMS and a series of actions are taken in order to:

- ▶ immediately provide first aid,
- ▶ report the incident to the authorities,
- ▶ inform the project/activity’s management, the Human Resources Division, the Health & Safe-

ty Managers, the Health & Safety Division, and the Project Employer, and

- ▶ investigate the causes so that the company can take corrective action to prevent a similar incident in the future.

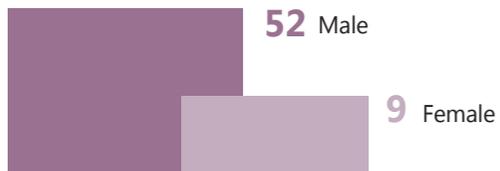
A relevant analysis and classification is carried out for every accident, depending on the type of injury and the nature of the accident, by the Health & Safety Officer in cooperation with the Occupational Health Physician of each project/activity. All accidents are reported on the Ministry of Labor’s online platform.

After each accident, Group companies investigate the causes with the investigation team, which includes the Site Manager, the Health & Safety Manager, the Safety Engineer, the person which had the accident 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. As a result of the accidents’ causes analysis and if deemed necessary, a specific health and safety flash is designed with the relevant issues and where necessary the Written Occupational Risk Assessment (WORA) is revised.

In accordance with the requirements of the Group companies’ Health & Safety Management Systems,

in addition to accidents, “near misses”, which are sudden events in the workplace without injury, illness or damage to employees, are also recorded. Recording, reporting and analysis of these incidents is essential to improve existing Health & Safety Management Systems and protective measures. In 2022, 22 near misses were recorded by the Group’s companies, the recording of which and the subsequent corrective actions contributes to the prevention of future accidents.

Group employees' injuries



Note: excluding pathological and fatal accidents, accidents with zero days of absence, and road accidents while commuting to/from work.

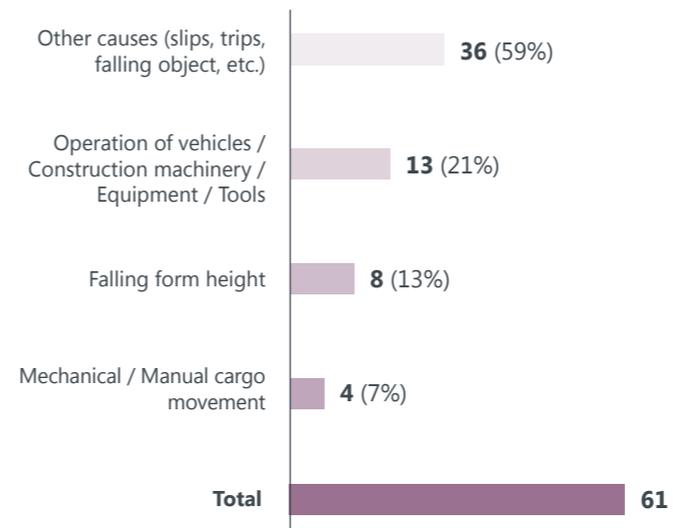
HEALTH AND SAFETY PERFORMANCE INDICATORS

The Group records and monitors performance indicators and sets targets for Health & Safety and for the continuous improvement of the Health & Safety Management System.

In 2022, at ELLAKTOR Group companies 61 employee accidents were recorded (excluding pathological, fatal, road accidents to/from work and zero days of absence from work) of which 55 were minor. Regarding road accidents, from the total of 61 accidents there was no occurrence of this kind during the working hours. Apart from 61 accidents, 20 more accidents were recorded with zero days of absence, as well as 10 road accidents while commuting to and from work.



Causes / Nature of Group Employees' Accidents



Regarding subcontractors' injuries, in 2022 there were 6 accidents (excluding pathological, fatal, accidents with zero days of absence from work, and road accidents while commuting to/from work).

On 08.07.2022, an accident occurred, resulting in the fatal injury of a subcontractor's employee - a natural person of the subcontractor company, in an electricity transmission network maintenance project. The exact causes and circumstances of the accident are being investigated by the competent authorities.

All accidents of the Group and its subcontractors are managed with the same procedure and methodology as defined by the Health & Safety Management System. All accidents, depending on their severity and magnitude, follow a sequence of actions in relation to their corresponding severity.

In all accidents, after the declaration to the competent authorities, an accident investigation is carried out by the project/activity investigation team, in accordance with the Group's internal procedure and always in accordance with the requirements of the applicable legislation.

In 2022 no occupational diseases and no deaths due to occupational diseases were recorded.



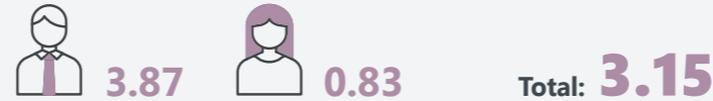
HEALTH AND SAFETY PERFORMANCE INDICATORS FOR GROUP EMPLOYEES

Accidents - Incidents Frequency rate

2020



2021



2022



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

Accidents - Incidents Severity rate

2020



2021



2022



Accidents-Incidents Severity Rate = (Total hours lost / Total working hours) x 100. The rate shows the hours of work lost due to accidents per 100 working hours.

Accidents - Incidents rate

2020



2021



2022



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

Note: The calculation of the rates excludes fatal accidents, incidents due to pathological causes, minor injuries (first aid), accidents with 0 days of absence from work, and road accidents that occurred during commuting to/from work.



HEALTH & SAFETY TRAINING

In order to ensure that employees are informed on Health & Safety issues, as well as to optimize the performance of processes, continuous training for the Group's employees and subcontractors, is required. Throughout this training, emphasis is placed on the impacts of non-compliance with the relevant Health & Safety rules, as well as on the avoidance of accidents, while at the same time the benefit of mobilization and compliance of each individual is emphasized.

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

Each newly hired employee, in all Group's project/ activities receives the Health & Safety induction training and the 15 Inviolable Health & Safety Rules training, is informed about the Health & Safety Policy and System in place, the persons responsible for safety (safety engineers, coordinator, occupational health physician) and the

hazards of the work to be performed. All employees working at ELLAKTOR Group's headquarters have access to the "Group's headquarters Employees Health & Safety Guide" through the online 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 2022, all new Health & Safety Managers of the Group's companies were trained in Health & Safety issues. Also, in accordance with the plan, the Health & Safety Officers of the Group's projects / companies were trained (with internal and external training).

Among others, the following training programs were implemented in 2022:

- ▶ Fire Safety Drill to the Emergency Team of the ELLAKTOR Group Head Offices by PYROGNOSI Institute (Hellenic Fire-Fighting Institute), lasting 5 hours, in order to ensure continuous training and preparedness in case of emergency. All employees who are members of the Emergency Team of the Group's headquarters participated in this drill.
- ▶ Seminar / Emergency Preparedness Exercise in Tunnels on "Management of Emergency Incidents within the

Road Network of 'ATTIKI ODOS' in the Vrillissia Tunnel with a scenario of fire, injury, entrapment, damaged vehicle". The exercise involved the Fire Service, the Traffic Police of Attiki Odos, the EKAB (Medical Emergency Service), a crane vehicle of the insurance company for loading and transporting the damaged vehicle, as well as the participation of 25 volunteers of the Hellenic Red Cross. The three-hour exercise took place after making the relevant traffic adjustments of the road network. In the exercise 18 employees participated from the Traffic Division of Attiki Odos.

- ▶ Training seminars on "Management of Fires Indoor and in Vehicles" by PYROGNOSI Institute (Hellenic Fire-Fighting Institute). The seminars, which followed up from the previous year, were attended by employees from ATTIKES DIADROMES SA and ATTIKI ODOS SA. These seminars included theory and practice, and were attended by:
 - 21 employees from ATTIKES DIADROMES with 107 training hours.
 - 1 employee from Attiki Odos with 7 training hours.

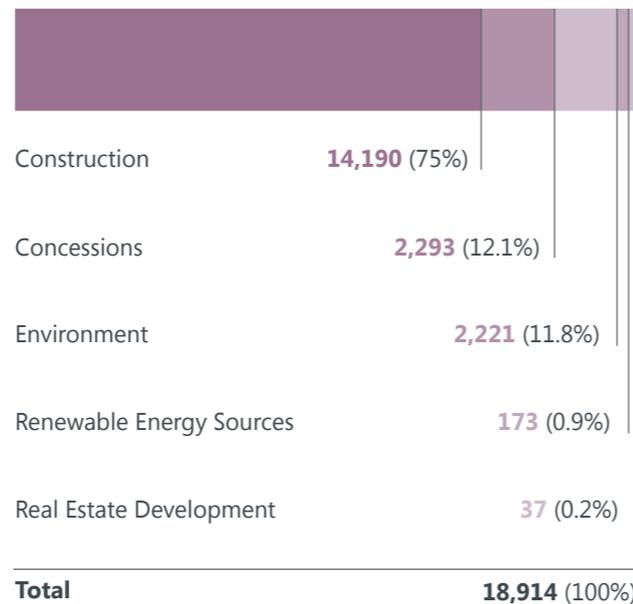
- ▶ Seminar for the Health & Safety Managers of TOMI SA, HELECTOR SA, ELLAKTOR SA, ELLAT SA, REDS SA, lasting 6 hours, by external certified body "TÜV NORD HELLAS", with the participation of 26 employees of the Group's companies, on "Safe work on construction sites - technical projects / the roles of project participants in Health and Safety at work".
- ▶ A 54-hour in-person seminar, by a group of employees of HELLENIC QUARRIES S.A., to 18 employees on "Risks and Prevention Measures in a Quarry", by the Hellenic Institute for Occupational Health and Safety (ELINYAE).
- ▶ Seminar on "Communication and Team Leadership - Creating a Culture of Health & Safety" by ELINYAE, at the Thessaloniki Metro Project to 20 employees with a total of 8 training hours.
- ▶ Occupational Health and Safety seminars, for 5 hours, by an external certified organization (virtual training), with the participation of 3 employees of HELECTOR SA.

Finally, in the context of systematizing the recording of the training courses attended by the subcontractors' employees, relevant certificates are issued when the respective train-

ing courses are completed. According to the available data, in 2022, employees of the Group's subcontractors attended approximately 5,950 hours of training on Health and Safety issues at work.

The difference in training hours compared to 2021 results from the reduction in the number of new Group projects, the completion of the main training plan for the majority of the Group's employees in 2021, as well as the completion of projects.

Health & Safety training hours



Note: The RES segment includes the data of parent company ELLAKTOR S.A.

Safeguarding Human Rights

For ELLAKTOR Group, respect for human rights is a non-negotiable value, both for its employees and its business partners.

The Group, due to its international presence, employs a very large number of employees in its projects and activities, either directly, or indirectly through its business partners. Although the institutional framework and working environment may vary significantly from one country to another, ELLAKTOR Group recognizes that it is its duty to safeguard the rights of people and local communities that may be affected by its projects and activities. To ensure this, the Group intends to apply a set of principles and guidelines regarding human rights in all its companies and in all countries where it operates.

The [Group's Human Rights Policy](#) sets the framework, as well as the principles for the respect of human rights at work, with the aim of safeguarding the rights of the Group's employees, its business partners and the local communities in which it operates. The Policy is uploaded on the Group's website, in order to be accessible to all interested parties.

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, and the International La-

bour Organization's Declaration on Fundamental Principles and Rights at Work (ILO 87 and ILO 98). According to the Human Rights Policy the provision of equal opportunities is an obligatory condition.

The Group's principle is that where national legislation and international human rights standards differ, the strictest standard should be applied. In cases where national legislation conflicts with international standards, the Group seeks ways to comply with international standards to the maximum extent possible, while complying with national legislation.

Having endorsed the UN Global Compact, which promotes at international level the adoption of 10 globally accepted principles in the areas of human rights, labour, environment and anti-corruption, ELLAKTOR Group is committed to adhere to these principles in the conduct of its business activities, as well as in its cooperation with its stakeholders.

At the same time, both the Group and its employees are protected by the terms and provisions of the Group's Code of Conduct, which they sign during their hiring process, as the business partners through their contracts.

The Group offers compensation in full compliance with all applicable laws and industry

standards and all employees receive equal pay for equal work, regardless of race, gender, color, nationality or national origin, class, religion, age, disability, marital status, sexual orientation or gender identity, political and cultural beliefs. In addition, it follows and implements what is required by labor legislation, regarding working hours, work schedules and the payment of statutory bonuses / benefits. It is worth noting that 73% of employees are covered by the National Collective Labor Agreements in force in each country of operation covered by this Report, and that all Group employees are at least 18 years old.

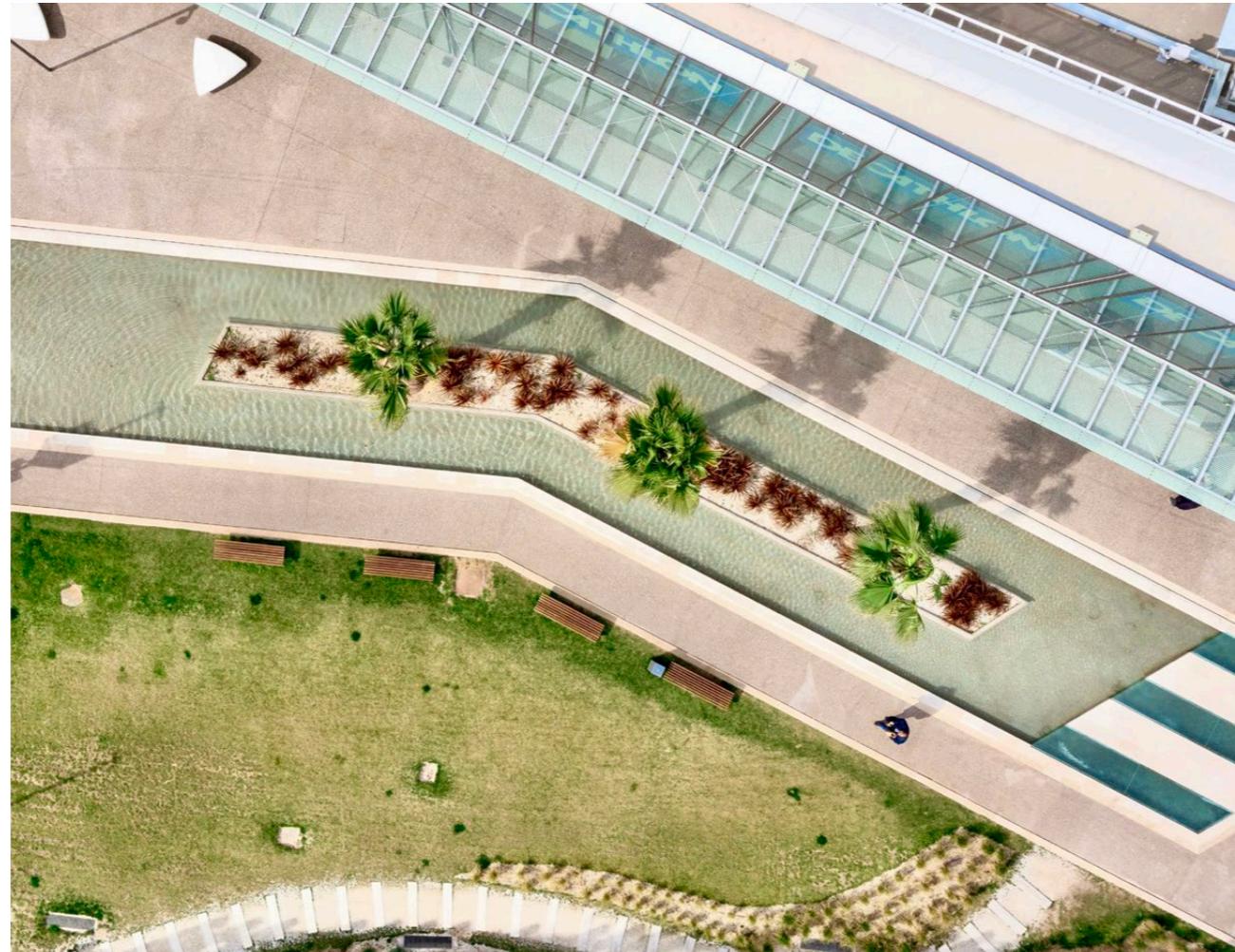
With regard to parental and maternity leave, the Group fully applies the applicable labor legislation.

In 2022, 91 employees (6 male, 85 female) in ELLAKTOR Group were entitled to maternal/parental leave, and all of them used it. 100% of employees expected to return from parental leave, returned to work as normal. The percentage of employees who returned from parental leave and remained with the Group 12 months after their return, was 95%, while employees who did not remain with the Group left voluntarily (contract expiry or resignation).

The Group complies with the requirements of the legislation on the right of association and collective bargaining, ensures that

employees participating in trade unions do not face intimidation or harassment and is committed to constructive discussion with the legally elected employees' representatives, in mutual respect and good faith.

As a result of the above procedures, during 2022 the Group did not have any confirmed incident of human rights abuse and/or violation, reported to the Group's Human Resources Division or Compliance Division.



Diversity, Equity & Inclusion

Equal opportunities, as one of the Group's core values, are placed at the center of the corporate culture, reflecting the belief that a sustainable world can only be achieved if the right conditions are created to encourage and value diversity and promote dignity and inclusion, both in the workplace and in the wider society. The creation of a workplace that defends and promotes diversity, equity and inclusion allows ELLAKTOR Group to respond effectively to challenges, and strengthen commitment, creativity and innovation to achieve economic prosperity and growth.

In December 2022, [the Diversity, Equity and Inclusion Policy](#) was adopted, with the purpose of defining the basic principles related to diversity, equity and inclusion, as well as describing the relevant regulatory documents and the Group's commitments to developing and shaping a diverse, fair and inclusive working environment. The Sustainable Development Committee monitors the compliance with the Diversity, Equity and Inclusion Policy, the relevant KPIs established at Group level and encourages initiatives that promote respect and equal opportunities,

ensuring a fair and inclusive work environment. In addition, in order to strengthen the corporate culture on these issues, the ESG Strategy & Sustainable Development Division in cooperation with the Human Resources and Communications Divisions are designing a comprehensive training program, for both managers and team leaders, as well as for all employees, on Diversity, Equity and Inclusion issues, which has been approved by the relevant Committee.

ELLAKTOR Group's intention is to promote the values of Diversity, Equity and Inclusion, and to strengthen in this direction the corporate Principles, Policies and Codes, such as the Code of Ethics, the Code of Conduct for Business Partners, the Human Rights Policy and the Human Resources Policy. In addition, the Group aims to extend these principles across its supply chain, through the Code of Conduct for Business Partners, which forms the basis of cooperation with Business Partners.

On the occasion of the European Diversity Month, ELLAKTOR Group signed in May 2023, the Diversity Charter for Greek Businesses, contributing to the European Commission's work to promote the acceptance of diversity and equal opportunities policy in the workplace.

By accepting the terms dictated by the Charter, ELLAKTOR Group reinforces its commitment to practices that ensure the respect, acceptance and diversity of the company's human resources, without discrimination, thus contributing to ensuring a fair working environment with equal opportunities for all.

In addition, in 2022, ELLAKTOR Group signed the declaration of support for the Women's Empowerment Principles (WEPs), created by the UN Women and the UN Global Compact, to promote worldwide gender equality and the empowerment of women in the workplace, in the market and society. At ELLAKTOR Group, gender equality is a non-negotiable fundamental right and the endorsement of the Women's Empowerment Principles is confirmation of its commitment to a workplace free of inequalities and exclusions.

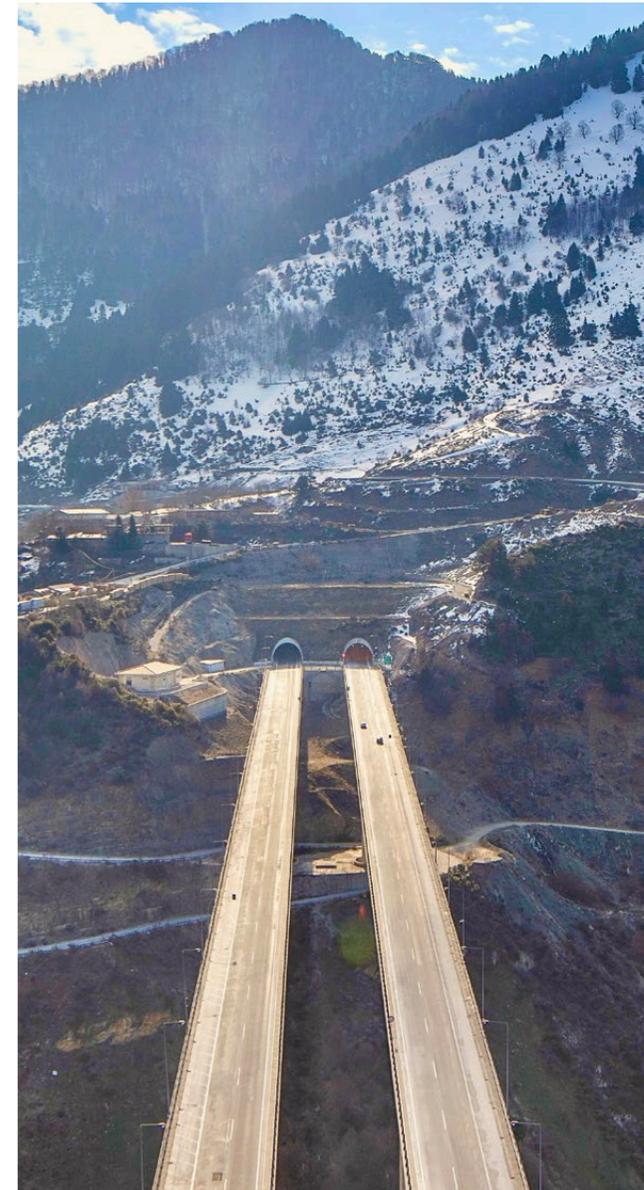
In addition, ELLAKTOR Group participated, for the first time, in the Bloomberg GEI Index, achieving a score higher than the inclusion threshold. This success was the result of a series of actions and initiatives implemented over the last two years and a real recognition of the Group's commitment to the principles and dynamic promotion of diversity, equity and inclusion.

Finally, in March 2023, eleven executives from the Strategic Development, Communication, Human Resources and ESG Strategy & Sustainable Development Divisions, attended the in-house seminar "ISO 30415 DIVERSITY & INCLUSION", aiming to develop a system and procedures, based on the requirements of the

standard and to independently and externally validate the organizational approach applied in the Group regarding the integration of Diversity and Inclusion in the work environment.



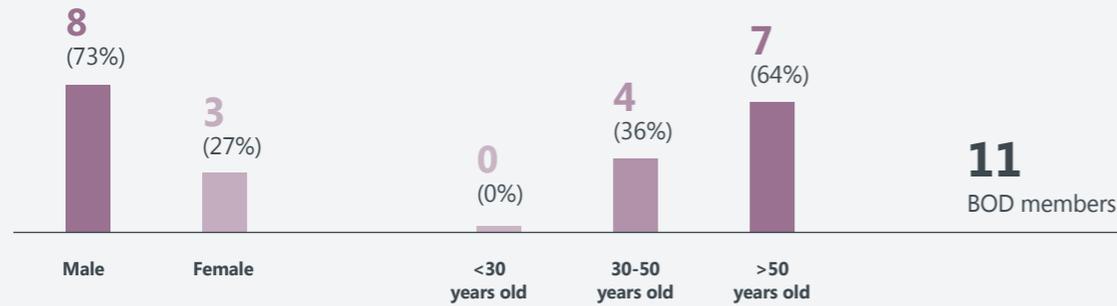
Equal opportunities, as one of the Group's core values, are placed at the center of the corporate culture.





Diversity in Governance Bodies

(Board of Directors 31.12.2022)



Diversity in Employees



In 2022, in ELLAKTOR S.A., the ratio of basic salary of female to male employees was 0.75, while the ratio for employees in managerial positions was 0.84 and for employees in non-managerial positions 0.70.

In 2022, 3 people with disabilities (males) were employed in the Group, while 16% have a different nationality from the country in which they are employed.

It is noted that during 2022, no incident of discrimination was recorded to the Group's Human Resources Division or Compliance Division.

Social responsibility

ELLAKTOR Group operates with environmental and social responsibility, providing high quality infrastructure, energy and environmental projects, aiming to improve the

quality of people's life, promote sustainability and continuously create added value for all shareholders, employees, the Greek economy and society.

ACTION PLAN

In order to achieve the strategic priorities set, the Group has developed the following action plan:

Establishment of a communication channel for discussion and consultation	▲
Establishment of an Annual Donations - Sponsorship Plan	✓
Increase the employee volunteer activities compared to 2020	✓
Permanent cooperation with Organizations and Foundations	✓
Stakeholder opinion survey every 2 years	✓
New channels for direct communication with stakeholders	▲
Increase audits for quality control in projects	▲
Increase training in quality control engineers	▲

▲ Short term target (1-3 years) ▲ Medium term target (4-7 years) ▲ Long term target (8-10 years)

Contributing to sustainable cities & communities' development

ELLAKTOR Group implements projects and infrastructure that contribute to the well-being of urban residents and the creation of a more friendly and sustainable and inclusive urban environment. The Group analyzes and assesses the risks associated with the operation of its projects and takes measures to mitigate them, address emergency situations, and ensure the proper operation of the areas of its activities.

INFRASTRUCTURE SAFETY AND USERS EXPERIENCE



The safety of construction, during its execution and maintenance, is ensured through the systematic compliance with the relevant requirements, which are detailed in the respective contracts and in the national and international audit standards for construction. Effective management of these requirements is achieved by establishing appropriate audit procedures, integrating them into the Quality Management Systems in accordance with the ISO 9001:2015 standard and allocating appropriate resources (personnel,

equipment, materials, external partners, etc.) for their effective implementation.

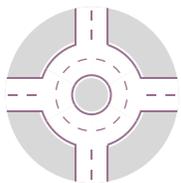
This ensures that:

- ▶ Potential risks to the safety and integrity of structures are identified and scenarios for their avoidance and/or mitigation are implemented.
- ▶ Appropriate procedures, audit manuals, maintenance, and control programs are developed to ensure that checks are carried out at predetermined stages and that standard control steps are followed.
- ▶ Results of the respective audits are evaluated, and appropriate corrective actions are implemented where required.
- ▶ The inspections are carried out by experienced and qualified staff.
- ▶ Experienced and reliable external partners are used to carry out inspections that require specific expertise and resources, guaranteeing the integrity of the process and the results of the inspection performed.

- ▶ Materials and products that comply with the essential requirements (legislation, health and safety, etc.) are used, which are recorded through documentation provided by manufacturers/suppliers (e.g. performance declarations, laboratory analysis results, etc.).

The control procedures are reviewed by the quality engineers and the Central Quality Management Department at regular intervals to confirm that the relevant requirements are being met.

In the Construction segment, corrective works (reworks) were carried out in 2022 as a result of internal audits to ensure the safety of constructions in domestic and international projects of AKTOR. The total cost of these operations amounted to €763,523 which corresponds to 0.07% of the Group's turnover.



The safety and service of highway users are a constant concern of the Group's companies responsible for their operation and maintenance. These companies ensure that users have a properly maintained and safe road infrastructure and that

highways operate smoothly to make travel safer and more sustainable. On Attiki Odos, the average response time to incidents is 5.6 minutes.

ATTIKES DIADROMES applies the requirements of ISO 39001:2012 standards for road traffic safety management, having received numerous distinctions in this field from the European Commission, the International Road Federation (IRF) and the International Bridge, Tunnel & Turnpike Association (IBTTA). In addition, ATTIKES DIADROMES carries out regular checks and audits on the technical elements of ATTIKI ODOS road based on the Audit and Maintenance Manual approved by the Greek State. It also submits proposals to ATTIKI ODOS for heavy maintenance and/or improvements and ATTIKI ODOS proceeds with the preparation of a relevant implementation program.

The positive impact of these actions is reflected in the drivers' responses for the sense of safety in the annual subscriber and driver survey. In 2022, after 2 years from the last survey, due to restrictions imposed by the COVID-19 pandemic, the survey was conducted once again. Specifically, for 2022, 95.1% of respondents stated that they feel very/quite safe when driving on ATTIKI ODOS, while 82.6% stated that they are very/quite satisfied with the service provided by the assistance teams. Additionally, according to the survey, users of ATTIKI ODOS save an average of 30 minutes on each of their journeys, while 84.9% state they save between a quarter and up to an hour.



The Group's companies operating in the Environment segment, through the practices they apply in the mixed waste management projects, contribute to achieving high rates of reuse and recycling. This aids in pre-

serving the value of natural resources, raw materials and products while enhancing their contribution to the circular economy.

At the same time, through the projects they manage, they take a leading role in the green transition towards a sustainable world. They preserve ecosystems and biodiversity while improving health and quality of life.

Finally, the companies of the Environment segment implemented in 2022 initiatives and programs aimed at reinforcing infrastructure in the areas where they operate, alongside at public education and awareness campaigns on environmental protection, with emphasis on recycling and reuse.

In December 2022, under the motto "Changing habits, changing the future", EPADYM S.A., a Group's company, collaborated with DIADYMA to conduct a series of informational campaigns in the major municipalities of the Region of Western Macedonia. The goal was to educate and raise public awareness about waste management for the planet's protection.



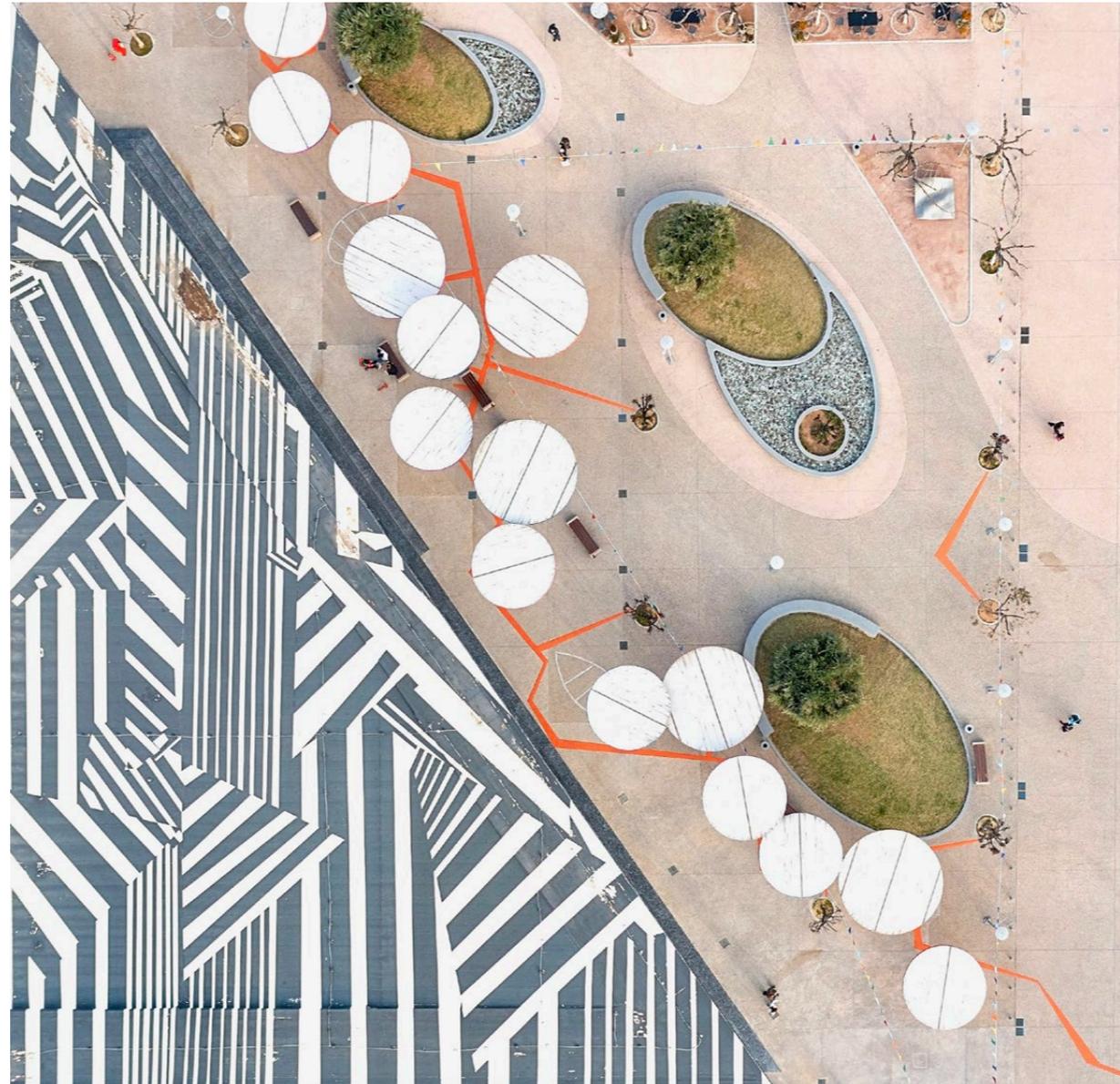


In the Real Estate Development and Management segment, and specifically with regard to the operation of the Smart Park, the

commercial park of the Group's company YIALOU COMMERCIAL & TOURIST, the health & safety of visitors and park's employees are a key priority.

The Smart Park was designed and constructed to offer visitors a safe outdoor environment, free from cars and motorcycles, while also taking into account the needs of people with disabilities. In 2017, the park's public areas were certified according to the requirements and recommendations of the ELOT 1439:2013 standard "Organization friendly to citizens with disabilities - Requirements and recommendations", regarding:

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



The design and construction of the expansion of the Smart Park, covering an area of 15,200 sq.m., completed in November 2019, was carried out taking into account the requirements of the ELOT 1439:2013 standard. In July 2022, the company proceeded with the certification and expansion based on this standard, including the entire park's facilities in the scope of this certification.

As part of the maintenance of the park's communal areas, besides routine maintenance works, periodic certification of all lifting equipment (lifts, escalators, and stairs) used by both visitors and Smart Park employees is renewed annually, in accordance with the legislation.

Additionally, the Smart Park has an Audit Certificate for the Playground, that is open to visitors, according to standards ELOT EN 1176:2008 and ELOT EN 1177:2008.

The Smart Park's Security personnel is trained in providing first aid, and the premises include specifically designated areas with the necessary equipment, including 2 defibrillators, placed at different locations within the park. Fire extinguishing facilities, fire detection systems, portable equipment, etc. are regularly maintained in accordance with the legislation. While the Fire Safety Certificate is renewed at scheduled intervals. Among other measures, Smart Park has a Fire Safety Team, most of whose members have received training at the Firefighting Academy's facilities.



IMPROVEMENT OF THE URBAN AND BUILT ENVIRONMENT

ELLAKTOR Group contributes substantially to the development and upgrading of infrastructure at national and local level through the Construction segment, while the key focus of its Real Estate Development and Management segment is the upgrade of the residential areas, the protection of open spaces and the creation and renovation of recreational areas.

The Group, continuing its significant trajectory, has implemented high quality emblematic projects, such as Line 2 of the Athens Metro, the "Golden Line" of the Doha Metro in Qatar, the Acropolis Museum, the National Gallery (LEED silver), the Rio-Antirrio Bridge, the Psyttalia Wastewater Treatment Plant, the First Section of the Trans Adriatic Pipeline (TAP), the COSMOTE office building (LEED Gold), the National Museum of Contemporary Art (LEED Silver), ELECTRA Metropolis Hotel (LEED), office buildings on Filopappou Hill - EREN Athens offices (LEED silver), the Group's headquarters building (Green Building), as well as the ALPHA BANK building (Bioclimatic). The Group continues with investments in new projects such as the development, operation and management of the Alimos Marina and Cambas Park, one of the largest investment projects in Attica, with a budget of €200 million. The aim of those projects is to enhance the quality of life of people and local communities, with a focus on protecting and upgrading the urban environment.

The construction of all projects is always carried out in

accordance with the latest standards, the applicable environmental legislation and the approved environmental terms.

In the Construction segment, the Group's subsidiary TOMI S.A., contributes substantially to the development and upgrading of urban areas, both locally and nationally. Through its construction projects, it upgrades the image of the urban areas, contributes to the improvement of the microclimate, and it renovates streets and parks of urban areas within local districts, which serve as focal points for residents and visitors.

In the Concessions segment and with regard to the Attiki Odos project, in order to better integrate the project into the environment and the urban landscape, covered sections of the highway were developed during the construction phase, where feasible (e.g. in Vrilissia and the West Peripheral Road of Ymittos). Moreover, extensive flood control works were implemented to reduce negative impacts during extreme weather conditions. Consistent tree planting is also conducted along the highway slopes.

The Environment segment's activities offer multiple benefits to ecosystems and the economy, improving peoples' quality of life and contributing to resolving the issue of green space scarcity by reducing the need for landfills.

In the Real Estate Development and Management segment, the Smart Park, which ranks among the Group's most significant projects, stands as the largest open-air commercial park in Greece, covering a

total area of 53,300 sq.m. and welcoming 6.1 million visitors in 2022. Beyond being an open-air commercial park, it serves as a vital entertainment center for the region, featuring children's play areas, playground, dining outlets, an open-air cinema and green areas spanning 30,385 sq.m.



ELLAKTOR Group contributes substantially to the development and upgrading of infrastructure at national and local level.

NUISANCE MANAGEMENT

The impacts of the Group's projects on the local community may include exposure to noise, vibrations, particulate matter, visual disturbance and burden in the traffic network.



For the Construction segment's projects, which are implemented near settlements and within residential areas, traffic regulations are monitored and measurements of vibration, noise and particulate matter are carried out where required by the environmental permit. Each project follows the procedures of certified Environmental Management System and the approved environmental terms. If necessary, and if the project is located close to settlements or residential areas, then the noise generated by the construction activity is monitored and appropriate noise protection measures are implemented.

The noise and vibration control measures applied in the Construction segment are:

- ▶ Appropriate arrangement of machinery and scheduling of work.
- ▶ Regular maintenance of machinery and vehicles, routine noise checks and measurements.
- ▶ Control of vibrations generated by construction machinery.

- ▶ Avoidance of simultaneous operation of more than one source of vibration.
- ▶ Use of construction machinery and on-site equipment of anti-noise technology certified for noise emission (CE).
- ▶ Installation of temporary noise barriers to minimize noise.
- ▶ Appropriate arrangement of stored materials on-site to act as a temporary noise barriers where feasible.
- ▶ Adequate training for construction machinery operators.
- ▶ Avoidance of noisy works during quiet hours. Adjust working hours according to local conditions and sensitive receptors in the vicinity of the project.
- ▶ Switching off machinery and equipment when not in use.

Indicatively, in 2022, 126 24-hour and 60 four-hour sound measurements were carried out in the AKTOR projects "Thessaloniki Metro - Base Line" and "Thessaloniki Metro - Extension to Kalamaria", respectively. 8 hourly exceedances of the background noise levels were recorded, not related to construction site activities.

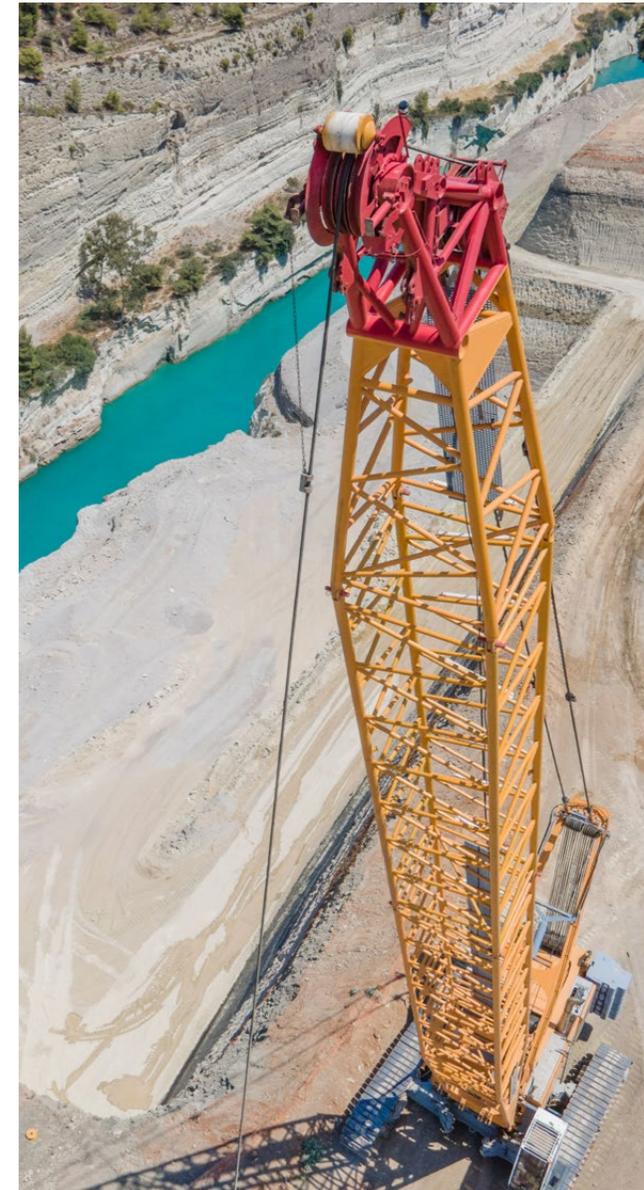
Equivalent measures taken in the Construction segment to reduce disturbance from particulate matter are:

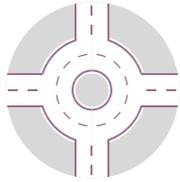
- ▶ Monitoring and measuring air emissions generated by the project's construction machinery

- and vehicles, where required.
- ▶ Scheduling the movement of project machinery and vehicles to minimize the impact on local road networks.
- ▶ Covering all transported cargos.
- ▶ Providing a wetting system for access roads, outdoor stored materials, and for sedimentation and dust prevention.
- ▶ In the case of excavation waste processing units, best techniques are applied to limit dust emissions to the environment.
- ▶ The storage time of aggregates and excavated materials on site is kept to a minimum.
- ▶ The material is deposited in piles at the minimum possible height (depending on the machinery used).
- ▶ Avoiding fully loaded trucks carrying materials for project needs from passing through residential areas.

In 2022 there were no significant reactions from the local community regarding nuisance issues. However, in case of complaints were noted, they were addressed immediately by the project engineers and Environmental Officers.

In case of nuisances and complaints from the local community, these are recorded and a nuisance assessment procedure is applied while measurements are taken, and where necessary, corrective actions are implemented to address the issues in the project or activity.





Concessions companies, through permanent and mobile noise measurement stations, monitor noise levels along the entire length of the highways they manage, in accordance with the legislation and their contractual obligations. The employees of the companies in the Concessions segment use company vehicles and construction equipment on the highways under their responsibility, following the Operations and Maintenance Manuals and in compliance with the principles of eco-friendly driving to reduce air emissions and noise.

The company ATTIKES DIADROMES, through special measuring devices positioned at 8 points along the Attiki Odos highway, monitors noise levels. In cases of exceedances, with the approval of the Greek State, ATTIKI ODOS proceeds with the installation of new sound barriers. In 2022, 127 24-h measurements were made with mobile noise measurement units. Based on these measurements, no additional noise barriers were required. Throughout the 21 years of operation of the highway, a total length of 21 km of sound barriers have been installed, as well as acoustic zones near entry and exit points with special plantations.

Accordingly, the company MOREAS monitors the road traffic noise indicators on an annual basis. Any requests from homeowners in the vicinity of the highway are examined and evaluated by the relevant Public Authorities. MOREAS adjusts its monitoring program following the relevant suggestions and orders of the competent Authorities. In 2022, 18 measurements of road traffic noise indicators were conducted at a total of 18 approved locations along the highway. Since the start of the concession project in 2008 until 2022, no exceedances of the established noise limits have been recorded.



In the Environment segment, in order to reduce environmental noise levels at the boundaries of the facilities, during waste collection and transportation activities and to comply with the applicable environmental terms, HELECTOR applies various practices, such as monitoring noise levels on a regular basis by conducting measurements at a large number of positions around the perimeter of the plants. Routine maintenance of vehicle and regular inspections at Vehicles Centers are also implemented to minimize noise. Additionally, noisy equipment is restricted to separate structures or units, either in the design phase of new units or in cases of identification of noise above the legal limits within the facilities perimeter.



The noise generated during the operation of a wind farm is mainly either aerodynamic, coming from the rotation of the turbine 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 minimize the relevant impacts. In particular, to estimate noise levels in the wider area of each wind farm, the WINDFARM software is used, which integrates the Danish model, in which 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 conditions are used to estimate the noise level under worst-case conditions. In addition, in order to further reduce the level of noise emitted during the operation of large-scale projects, special equipment with serrations 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 established limits, as defined in the legislation in force (1418 B/2003, 286 B/2007, Government Gazette 293 A/1981, Government Gazette 2464 B/2008).



COMMUNICATION WITH LOCAL COMMUNITIES

One of the Group's main concerns, through its overall business activity, is to build relationships of trust, solidarity and mutual respect with the local communities in which it operates.

Engagement with local communities is an ongoing effort to understand and respond to their needs through discussion and cooperation, where feasible.

With regard to the Group's Renewable Energy Sources segment, where environmental licensing and public consultation of the environmental study of each project is required, the company proceeds to inform regional councils and committees, municipal and community councils, and services, as well as statutory environmental bodies and organizations. The observations and any concerns of local authorities and bodies are taken into account in the design of the projects (see section "[Biodiversity & ecosystem protection](#)").

Respectively, in projects of the Real Estate Development and Services segment, the Group proceeds in the design and implementation of projects after consultation with the local community, taking into account its needs and expectations.

With the aim of strengthening its stakeholder engagement, ELLAKTOR Group is in the process of designing new channels of direct communication with stakeholders, planning to announce them in 2023.

Corporate Social Responsibility Actions

ELLAKTOR Group, acknowledging the importance of society as a whole and responding to its needs, undertakes initiatives to support society and vulnerable social groups. In 2022, the [Group's Donations - Sponsorships Policy](#) was approved, the purpose of which is to set the fundamental principles governing the Group's Donations - Sponsorships, the necessary characteristics of the sponsored actions and organizations, as well as the description of the procedures to be followed in the evaluation and implementation of Donations - Sponsorships.

At the same time, in 2022, the **Donations and Sponsorships Committee** was established at Group level, with the aim of ensuring the Group's commitment to always stand beside the society, listen to its needs and expectations and respond to them with sensitivity, professionalism, dignity and respect, fostering relationships of trust and supporting the local communities in which it operates. The purpose of the Committee, among others, is to approve, monitor and implement the Group's Donations - Sponsorships strategy and the Annual Donations- Sponsorships Plan.

ELLAKTOR Group's contribution to Society amounted to €3,731 th. in 2022, including the amount spent on supporting the local community (€2.6 mil.) and the amount allocated for the wider society (€1.1 mil.).

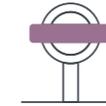
The Group's social action, both locally and nationally, focuses on the following 8 thematic categories:

SOCIAL SUPPORT - FOCUS AREAS:



Youth / education

The Group seeks opportunities that enable to share its experience and expertise with young people, to effectively integrate it into their learning and academic activities, as well as in the employment-seeking process.



Road safety

The Group develops programs for the education and awareness of children and adults on road safety issues, while at the same time it supports animal welfare organizations, aiming at the care and management of stray animals, their protection and the reduction of road incidents involving animals.



Infrastructure

The Group leverages its experience and available resources to contribute to local infrastructure improvement and, by extension, enhancing of residents' quality of life in the areas where it operates.



Sports

ELLAKTOR Group actively supports actions that promote the values of sports and stands by our athletes, who strive to exceed their potential every day.



Environment

The Group uses its experience and 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.



Volunteering

The Group makes Donations - Sponsorships for voluntary activities that promote the concept of volunteerism among its employees, which is an important part of its overall Corporate Social Responsibility strategy.



Culture

The Group uses its experience and resources to support cultural activities (such as restoration/preservation of buildings of cultural interest and archaeological works) that support and contribute to the local economy.



SDGs

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

Even though this particular strategy serves as the primary guide for supporting societal actions, ELLAKTOR Group responds promptly to both emergency needs and natural disasters, going above and beyond the established strategy.

INITIATIVES SUPPORTING SOCIETY

The Group companies plan their social contribution actions according to their segment of activity, but also according to the needs of both the local community and the wider society, where they operate. At the same time, the Group and its companies support financially credible and recognized non-profit organizations, social structures, institutions and local associations (e.g. sports clubs, choirs and cultural centers), while at the same time, they support educational events, with emphasis on the sharing of know-how.

Among the organizations, which the Group's companies supported in 2022, are the "ELPIDA" Association for children with special needs, the non-governmental organization "Make-A-Wish Greece", which ELLAKTOR Group has been supporting since 2016, the non-profit organization "DIAZOMA", the "SOS Children's Villages Greece", etc.

Indicative programs and actions implemented by the Group's companies in 2022, are indicated below.

Joined forces with the Bodossaki Foundation to equip and create science laboratories

With the aim of creating equal opportunities for the development of students in the country's public lower secondary schools, Bodossaki Foundation created the "Experience Science" program in collaboration with the Panhellenic Association of Heads of Natural Science Centres (PANEFKE), a program aiming to create and equip science laboratories in the country's public lower secondary schools. ELLAKTOR Group, responding to this important educational need and recognizing that in the years of lower secondary school, children receive the first, deeper motivation of the sciences of biology, physics and chemistry and that this contact is decisive for the development or not of their relationship with these sciences, collaborated with Bodossaki Foundation for the creation of fully equipped science laboratories.

ELLAKTOR Group's donation, which was completed in June 2022, made it possible to equip and create science laboratories in twelve (12) selected public lower secondary schools across the country, which are located in its areas of operation. In this way, the appropriate conditions were ensured for the enhancement of experiential learning for a total of 1,636 students in various regions of Greece, starting from the school year 2022-2023. This intervention is expected to support a corresponding number of students each year, multiplying the positive impact of the donation over a long period of time, in line with the Group's com-

mitment to systematically support society and contribution for the achievement of the UN Sustainable Development Goals.

This donation provides the opportunity and tools for students to learn and love science, supporting both their educational and professional futures. The experience of experiential learning of science will determine the degree of their understanding, improving the learning level in the classrooms and enhancing the potential to influence the career orientation of many of the beneficiary students and their competitiveness in national and international examinations.

Gold Sponsor of the Hellenic Swimming Federation

Furthermore, in the context of supporting the New Generation and healthy role models that promote effort, ethics, development and excellence, ELLAKTOR Group became a Gold Sponsor of the Hellenic Swimming Federation in 2022. The aim through this sponsorship, is to create better conditions for all athletes and clubs of the federation throughout Greece, to promote the value of sports for the younger generation and to support the aquatic professionals of the national teams in their efforts up to the 2024 Olympic Games.

Support a student from the island of Fourni

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 a total of 4 years, highlighting these values in practice.



Support of the School of Civil Engineering of the National Technical University of Athens

Following sponsorships to actions supporting the New Generation, ELLAKTOR Group, as well as ATTIKI ODOS, sponsored the training exercise organized by the School of Civil Engineering of the National Technical University of Athens in Europe, in order for students to follow the geotechnical development of large engineering projects, such as road works, tunnels, dams, railways, special foundations, bridges, etc. and examine cases of major failures of civil engineering projects due to geological - geotechnical causes, which are typical examples used in the education of civil engineers internationally.

Support of the national round of the 12th EBEC National Engineering Competition

In addition, ELLAKTOR Group supported the national round of the 12th National Engineering Competition EBEC (European BEST Engineering Competition), which is the largest engineering competition organized by students for students in Europe. It is held annually in 19 countries, 52 educational institutions, gathering over 4,600 participants. EBEC gives students in the STEM sector the

opportunity to test their skills and compete for a place in the next stage of the competition.

Finally, regarding new sponsorships related to the support of the new generation, the Group supported the iGEM Athens 2022 Synthetic Biology student research team, in order to represent Athens in the annual iGEM 2022 Synthetic Biology World Competition, which held in Paris and was attended by 56 teams from distinguished universities from 42 countries. The team won a gold medal and two distinction nominations in the categories "Best Safety and Security Award" and "Best Education Award", the result of 9 months of intensive effort and systematic engagement.

Support of the Hope Boxes initiative for vulnerable social groups in collaboration with Wise Greece

ELLAKTOR Group, consistent with its commitment to support local communities and vulnerable groups, joined forces for the first time with Wise Greece and the Hope Boxes initiative, for the nutritional support of our fellow humans in need. Wise Greece is a multi-award-winning non-profit Initiative that promotes the benefits of Greek food and the excellent products of small Greek producers worldwide. The profit from the sale of these products is used to collect and offer high nutritious food supplies to children, families, homeless people and elderly people living under the poverty line. The Group actively participated in this initiative by donating 550 Hope Boxes, equivalent to 2.8 tonnes of essential food supplies. Specifically, each Hope Box contained 5 kg of essential food supplies

and products of high nutritional, such as honey, olive oil, pulses, etc. The 550 Hope Boxes traveled to the Children's Asylum in Thessaloniki, Agios Nektarios – Orphanage and Soup Kitchen in Chania, as well as to the Child & Family Support Center, SOS Villages in Vari. The beneficiaries of this action of the Group amounted to more than 690 children and 40 of our fellow human beings through monthly soup kitchen.



Participation in the We4All Environmental Alliance

In the context of social responsibility actions with environmental actions aimed at reducing the impact of climate change, ELLAKTOR Group in 2022 participated for the first time in the We4All Environmental Alliance, as a Guardian member, for the donation of 1,000 saplings for tree planting. We4all is a non-profit environmental organization based in Athens, that started in 2018 after the wildfires that burned the Marathon area, resulting in huge losses of material goods, natural resources and human lives.

What sets We4All apart from other environmental organizations is that it takes responsibility for caring for the trees from the day they are planted until the plants are self-sufficient and self-sustaining (about 2-3 years). Last but not least, We4All is aligned with all 17 UN Sustainable Development Goals, from ending hunger and poverty to affordable and clean energy, quality education and sustainable cities and communities.

The Group decided to continue this very successful cooperation in 2023 and to upgrade to the EARTH PROTECTOR level, which is equivalent to planting up to 5,000 trees.



Companies operating in the Construction segment support local communities, listen to their needs and managing their requests.

They provide emergency

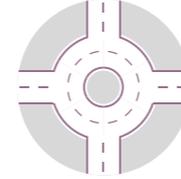
assistance, in cases of severe weather events, for example road snow removal, road restoration, flood and fire protection, while contributing to the maintenance, upgrading and improvement of existing infrastructures. Upon the completion of local projects, it is common practice to donate equipment, to meet the needs of local bodies.

Indicatively, below are some of the actions implemented by the companies of the Construction segment in 2022, in response to requests from local bodies for the improvement and upgrading of infrastructure, as well as the response to emergencies:

- ▶ Stream cleaning in the village of Loutro, at the request of the President of the Local Community of Loutro, Alexandroupolis.
- ▶ Donation of tires for military vehicles to the Mechanized Infantry Division in Alexandroupolis.
- ▶ Donation of 2 air conditioners, 1 laptop and 1 printer to the Iasmos Police Department.

- ▶ Improvement & Modernization of the Facilities of the Central Camp of the 180 "HAWK" Squadron in Polydendri, Attica.
- ▶ Donation of tiles for the landscaping and upgrading of the courtyards of the Children's & Nursery Schools of the "O.K.P.A.P.A." Public Entity, in the Municipality of Ioannina.
- ▶ Response to the request of the volunteer movement "STIRIZO" together with the Porto Lagos Cultural and Educational Society for the support of the Christmas celebration organized for the children of the villagers.

In addition to the above actions, it is worth mentioning that also in 2022, AKTOR, as the contractor of operation and maintenance of water treatment plants for the production of drinking water, contributes to the Sustainable Development Goal of providing clean drinking water to society.



For more than 11 years, the actions and programs implemented by the companies ATTIKI ODOS and ATTIKES DIADROMES have focused on the education and

awareness of children, young people and adults on road safety issues.

In 2022, with the support of the companies ATTIKI ODOS S.A. and ATTIKES DIADROMES S.A., five (5) road safety and traffic education programs designed with the assistance of specialized professionals continued to be implemented. In addition, during the year the cooperation between Attiki Odos and the Hellenic Children's Museum was extended, this time with the creation of a Digital Folder for primary school teachers. More specific:

- ▶ The e-Learning program "Open eyes on the road" for students of the 2nd and 3rd grade of Middle School and all grades of High school, has received the approval of the Ministry of Education and Religious Affairs and the Institute of Educational Policy (IEP) for the school year 2021-2022. It is the progression of the interactive live seminar of the same title and was created by ATTIKI ODOS and ATTIKES DIADROMES in order to meet the challenges of the digital era, approaching and raising awareness of the important issue of road safety among students and teachers throughout Greece, especially

those in the most remote islands and villages. In 2022, more than 2,800 students from 30 schools gained access to the Attiki Odos online program.

- ▶ The interactive exhibit entitled "I drive and walk safely", located on the ground floor of the Athens Conservatory, was designed by an interdisciplinary working group, with the participation of pedagogues and museologists from the Hellenic Children's Museum, as well as traffic experts from ATTIKI ODOS and ATTIKES DIADROMES, and was implemented after a six-month study, aimed at promoting traffic education in children aged 3 to 12 years old. In this particular venue, through play, creation, cooperation and active participation, children interact with each other, but also with the Museum's performers and the adults who play with them, and discover how to behave on the road, at crossings and traffic lights, and how to recognize the traffic signs around them. In 2022, the Children's Museum of Athens welcomed the public in specific time zones, with 2,852 children and 2,743 adult visitors.



- ▶ The Digital Activity Folder for Traffic Education was designed in 2022, with the support of the two companies and the seal of the Hellenic Children's Museum, aiming to become an important tool for every primary school teacher. It includes, among other things, suggestions for activities for primary school students, inspired by the exhibit "I drive and walk safely", which operates at the Children's Museum of Athens. Teachers can integrate the activities either in the interdisciplinary curriculum of their classroom, or in the context of thematic pillars / workshops for the development / cultivation of skills. In 2022, the Digital Portfolio was sent electronically to 218 teachers from 139 schools that expressed interest.
- ▶ The experiential educational show "Attikoulis" was first presented in 2006 and has now reached its 6th script revision under the title "Attikoulis & the Kingdom of Atzamosini". It is a two-hour theatrical game that aims to introduce Kindergarten and Primary School children to the basic principles of road safety, with creativity and imagination. Over 1,600 children and adults had the opportunity to travel with Attikoulis' new adventures in 2022, with the total impact of the show over the

years amounting to approximately 63,000 children.

- ▶ The music and dance performance "The Asphalt Trobadours" with the popular youth band Burger Project is a new initiative from ATTIKI ODOS and ATTIKES DIADROMES, which is addressed to children of Kindergarten and Primary School. In the context of 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 equipment. In 2022, which was actually the year the action was launched, more than 4,600 children from 27 schools danced and sang along with the popular band to the rhythms of traffic education.
- ▶ 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 2022, this experiential traffic education program was implemented in 75 kindergartens and primary schools and about 3,900 chil-

dren participated in it. In total, over the years, more than 80,000 children have attended the event, with the support of the two companies.

Actions implemented by the companies ATTIKI ODOS and ATTIKES DIADROMES, are listed below, for information and awareness on road safety and safe driving:

- ▶ Creation of three (3) additional informative videos that have been posted on Attiki Odos' YouTube channel, in which safe driving instructor Thanasis Choudras interacts with the main actors and shares useful information. Their themes touch on basic aspects of everyday life, always aiming to raise awareness in society: bicycle riding, baby in the car, dog in the car.
- ▶ Supported once again the significant 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 specialized program under the guidance of expert Thanasis Choudras. Specifically, 30 riders/responders of the organization participated in a specialized theoretical and practical training program.

- ▶ They carried out a promotional and information program aimed at further promoting the educational programs of Attiki Odos for the promotion of road safety culture.

In addition to road safety actions, in 2022, ATTIKI ODOS and ATTIKES DIADROMES made donations to NGOs and other organizations, totaling **more than €35,000**. Some examples are the Association "Diazoma", "Sotiria" General Hospital of Chest Diseases of Athens, Hellenic Animal Welfare Society (Filozoiki), Rehabilitation center "Dynamai", Kyrillos Hill Cultural Society, the SOS Children's Villages, the Organization "Greek Caravan of Solidarity", "Floga" Parents' Association of Children with Cancer, "ANIMA" Wildlife Care Association, and the Association "Friends of the Child".

In addition, the companies proceeded to the allocation of 2 PCs for the needs of the Erythron lower secondary School in the Municipality of Mandra - Idyllia.

As part of their actions to promote road safety, more than 3,500 pieces of road supporting equipment and auxiliary material (reflective vests, triangular reflective backpacks, reflective bicycle lights, etc.) were distributed. Finally, the companies responded to requests from operators for the temporary availability of a total of 740 traffic cones for 4 sporting events.

The company MOREAS supported financially the implementation of the 28th International Dance Festival of Kalamata in 2022. Furthermore, MOREAS was a supporter of the 1st Festival of Robotics & Intelligent Systems organized by the Municipality of Kalamata, showing that the Group's companies are next to the New Generation and to actions that aim to promote innovation and digital transformation.



The actions and programs implemented by the Group's companies operating in the Environment segment, focus on actions aimed at raising environmental awareness and supporting the areas in which they operate.

HELECTOR sponsored the initiative "Clean Ocean - Contributing to a more sustainable future!" organized by XTERRA Greece - TRIMORE Sport Events, on the seabed alongside Ydrousa, the islet opposite Voula, Attica. The action was completed in October 2022 with the recovery of 26 large-scale tires, which were found on the seabed alongside the island of Hydrousa, opposite the area of Voula. The tires were retrieved from the seabed by the certified divers of the Elite Special Task Force Egaleo and the assistance of both the Municipality of Vari-Voula-Vouliagmeni and of the Technical Construction Company Tekal S.A., which provided the necessary floating equipment.

The tires were cleaned and washed to remove sand

and objects or living organisms that had adhered during the time they remained on the seabed and were then transferred to the Municipality's warehouses, from where, through a partner of a special and authorized transporter, ECOELASTIKA, were managed.

The aim of the action was to contribute to the protection and restoration of the environment, as well as to raise public awareness on environmental issues.

HELECTOR's 100% subsidiary company, EDADYM SINGLE MEMBER SA, supported for another year the actions of the Municipality of Eordaia in the framework of the "European Mobility Week", in order to raise awareness and encourage citizens to use sustainable alternative modes of transport in the urban areas.

Responding to the needs of both the wider and the local community where it operates, HELECTOR responded to the request of the 1st Primary School of Tagarades in the Municipality of Themi, Thessaloniki, for the supply of a laptop and a projector, in order to meet the needs of the school and to facilitate the educational work of the teachers.





The initiatives supported by the companies of the Renewable Energy Sources segment, focused, also on 2022, on improving the infrastructure of local communities, where wind farms are being constructed or operate and include, amongst others, the following:

► In the Regional Unit of Laconia, in the Municipality of Monemvasia, the Group, among other actions, undertook the cost of maintenance work on rural roads in the local community of Reihea, as well as maintenance works on the Citizens' Service Center and the building of the community center. It also covered the cost of carrying out road widening - cementing works in the local community of Koupia and undertook the cost of counting water meters in the municipal unit of Zaraka.

- In the Regional Unit of Kozani, in the Municipality of Voio, the Group supported the material and technical equipment of the Eratyra Lower Secondary School and the Galatini Primary School and financially supported cultural events held in the local community of Eratyra.

- In the Regional Unit of Ioannina, in the Municipality of Pogonio, the Group undertook the expenses of the educational excursion of Parakalamos Lower Secondary School and participated as a Sponsor in the annual anniversary event "Kalpakia 2023". Furthermore, the Group supported an educational initiative in the framework of the "Climate Neutrality Week" organized by the Municipality of Ioannina in cooperation with the Regulatory Authority for Energy.

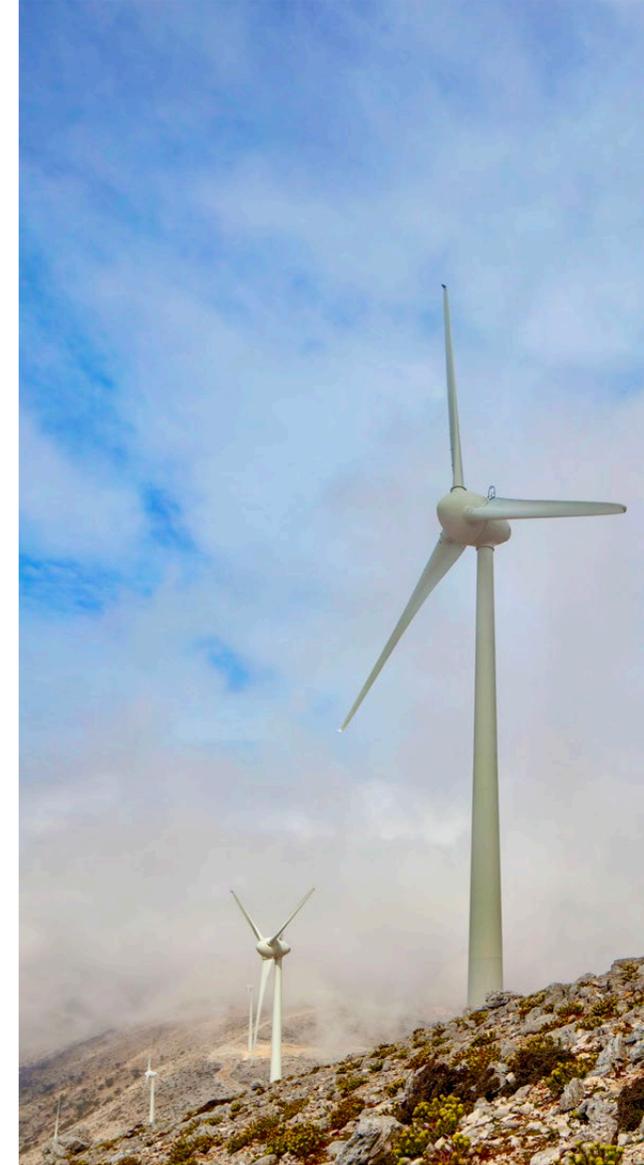
In addition, through monetary donations, the work of many local institutions and cultural associations was supported, such as the Cultural Association of Prosvoros in Grevena, while also providing equipment to the Traffic Police of Veria and Police Department of Polyneri in Grevena.

It is worth mentioning that in 2022, the local communities in which Group's RES projects operate, received the special contribution fee, corresponding to 3% of total electricity sales (before VAT). The total amount relating to 3% of the relevant sales is divided as follows:

- Approximately 57% of this amount is attributed to the first-tier Local Authority(ies) where each project and its interconnection projects are located.
- Approximately 10% of this amount is paid to the Green Fund (E.T.E.R.P.S.).

- Approximately 33% of this amount is allocated to the residential consumers of the local community where each project is located through the electricity supplier of these consumers.

Finally, as regards the small hydroelectric power station at the location of Smixiotiko, in addition to the above-mentioned deductions, an additional 1% of the electricity sales (before VAT) of the station is paid to the Operating Entity.



Employee Volunteering

ELLAKTOR Group, as part of the social contribution program and in celebration of the company's Volunteering Month, which has been an established tradition for the past two years, carried out activities in 2022, aimed at supporting our fellow citizens in need, and implementing environmental initiatives aimed at mitigating the impacts of climate change. Evidence of employee participation in these efforts was the doubling of volunteer hours, which amounted to 359 hours in 2022.

Faithful to its commitment to the non-governmental organization Make-A-Wish Greece since 2016, the Group carried out the "Grant-A-Wish" for yet another year. This initiative provides the opportunity for all participating volunteers to design and fulfill the wishes of children aged 3-18 years old who are suffering from serious illnesses. This year, just like the previous year, the Group adopted 6 wishes, and the implementation was entrusted to the employees from its subsidiaries. The action was implemented at the Group's headquarters, which also hosted the Christmas and Easter Bazaar of Make-A-Wish Greece, to further support the work of the organization.



ELLAKTOR Group employees actively participated in the Hope Boxes program in collaboration with Wise Greece, by voting for the institutions to which the 550 Hope Boxes would be sent. The foundations chosen by the employees were in Athens, "The SOS Villages Child & Family Support Center", in Crete, "Agios Nektarios - Orphanage for Children & Soup Kitchen of Chania" and in Thessaloniki, "The Asylum of the Child". As part of this action, representatives of ELLAKTOR Group accompanied by members of the Hellenic Swimming Federation and athletes of national teams visited the SOS villages in Vari, sending a strong message of social solidarity and love and decorated the Christmas Tree of the village with greeting cards created by the Group's employees.

As part of its objective to enhancing quality and accessible education for all in the local communities where

it operates, ELLAKTOR Group, in response to the request received from the 3rd Primary School of Magoula, Attica, proceeded to collect 300 books donated by the Group's employees, to support the school's newly established library. The goal of this action was to enrich the school library, strengthen its role as an educational tool, and create an exemplary space that is an integral part of the educational process for the 170 young students of the school.



ELLAKTOR Group, recognizing the great humanitarian crisis caused by the war in Ukraine and wishing to assist by providing immediate aid to our fellow humans, has decided to support the initiative of the Hellenic Federation of Enterprises (SEV) for the collection and dispatch of essential supplies. This initiative was car-

ried out in cooperation with the Ukrainian Consulate, the Municipality of Thessaloniki and the "Pharmacists of the World". With the help of the Group's employees, a total of 50 boxes of food, clothing and pharmaceutical material were collected, packed and delivered to the Municipal Hall of Thessaloniki and the relevant authorities, with the aim of providing relief to our fellow humans in Ukraine.



Evidence of employee participation was the doubling of volunteer hours, which amounted to 359 hours in 2022.

Blood Donation Data of Group Companies for 2022

384

Blood donors



12

Blood donations

561

Blood Units

76

Blood Units used by Group employees

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, in case of a need. It is worth noting that participation in the blood donation program is very high every year.

Also, a blood donors' association has been established at HELECTOR in the Mechanical Recycling and Composting Plant. In cooperation with Evangelismos Hospital, blood donations are carried out twice a year through the hospital's mobile unit, which visits the factory site.

The ELLAKTOR Group's Medical Station, in cooperation with the Blood Donation Center of "ELPIS" Hospital, held the 1st Blood Donation Day on Wednesday, September 7, 2022, at the Multipurpose Room of the Head Offices. The purpose of the Occupational Health Clinic is to create and maintain the Blood Bank through the systematic voluntary blood donation of the Group's employees.

All Group companies that implement voluntary blood donation activities reward donors with an extra day of leave for each participation in a voluntary blood donation.



ELLAKTOR Group - 1st voluntary tree planting

In 2022 ELLAKTOR Group became a member of the We4All Environmental Alliance, receiving the Guardian award for the donation of 1,000 saplings.

As part of its social responsibility activities with environmental voluntary initiatives aimed at mitigating the effects of climate change, ELLAKTOR Group, in cooperation with the Environmental Organization We4All, implemented the first voluntary symbolic tree planting in the area of Paiania, at the foothills of Mount Hymettus.

With the participation of 30 volunteers - employees of the Group, 180 saplings and plants were planted in just 2 hours, with the guidance of the people of the Organization, out of a total of 1,000 donated by the Group. The Environmental Organization We4All is responsible for the saplings, which will take care of them until they become self-sufficient and self-sustaining.

The Group's employees, who embraced the action, proved that teamwork, volunteerism and selfless contribution are the key to creating a better and sustainable future for all.



Volunteerism and selfless contribution are the key to creating a better and sustainable future for all.



GOVERNANCE

ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS



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ALIGNMENT WITH THE PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT





Main achievements



Implementation of an Enterprise Risk Management System



Certification with ISO 37002:2021 - Whistleblowing Management System



Risk assessment of business partners using ESG criteria



First company in Greece to receive ISO 37000:2021 certification - Governance of organizations



5 Committees for the optimal operation of the Group's procedures

Material Issues

Compliance, integrity and business ethics

Business continuity and emergency preparedness

Reinforcement of innovation, research and digital transformation

Promoting sustainability in the supply chain

Our performance

0

confirmed incidents of corruption

92%

of supplies procured from local suppliers

8

research projects

€2,463 th.

investments in digital transformation

27%

of the members of the Board of Directors are women

0

incidents of personal data breaches of the Group's customers or non-compliance with the General Data Protection Regulation



ELLAKTOR Group is committed to responsible and ethical practices, which define its approach across its entire business activities. This commitment is critical to the success of both the Organization and its business partners, always guided by the Group’s values.

In order to achieve the goals (short-, medium- and/or long-term) set in the areas of Integrity and Business Ethics and Innovation & Digital Transformation, the Group has planned a series of actions for the coming years, which are listed below and the progress of which is analyzed in the individual sections of this chapter.

ACTION PLAN	
Evaluation and rating of suppliers and subcontractors based on ESG criteria	▲
Development of action plans to improve the ESG performance of suppliers and subcontractors	▲
Expansion of the evaluation and rating to business partners based on ESG criteria	▲▲
Monitoring of action plans to improve the performance of business partners	▲▲
Creation of courses on bribery on the e-learning platform and training of employees who have access to it	▲
Development and implementation of a Business Partner Due Diligence framework on Business Ethics and Integrity issues	▲
Integrity clause in all contracts with business partners	▲
Training the Group’s Critical Business Partners on the Code of Conduct for Business Partners	▲
Training of the Group’s non-critical Business Partners on the Code of Conduct for Business	▲▲
Certification of the ELLAKTOR Corporate Governance System in accordance with ISO/IEC 37000:2021	✓
Installation and implementation of advanced technologies, such as the Internet of Things (IoT) and smart reporting using Artificial Intelligence (AI), in production units for the most efficient management of machinery, tools, and personnel	▲▲
Gradual migration of 70% of the Group’s systems to Cloud Servers	✓
Continuous increase in participation in research projects in the areas of interest	▲▲
Establishments of partnerships with technology companies, research centers and educational institutions that foster innovation	▲

▲ Short term target (1-3 years)
▲▲ Medium term target (4-7 years)
▲▲▲ Long term target (8-10 years)

Corporate Governance

The demanding and constantly changing environment in which ELLAKTOR Group operates necessitates the need for an effective corporate governance framework that responds to the challenges of the times and adapts to business, economic and social conditions, recognizing risks and opportunities.

The Management of ELLAKTOR has established a strong and effective Corporate Governance System aiming at the successful implementation of the Group's strategy, in order to ensure both the profitability and the interests of its shareholders and the protection of the legitimate interests of all stakeholders.

In October 2022, ELLAKTOR received the ISO 37000:2021 Certificate for Governance of organizations after an audit by an independent body and is one of the first companies in Greece to receive this certification. ISO 37000:2021 on the Governance of organizations incorporates all international best practices and is the global reference point for good governance.

Good governance not only fosters an environment of trust, transparency and ac-



countability, but also helps to align an organization's purpose with the needs of society, building strong relationships with stakeholders, while effectively managing and preserving its resources.

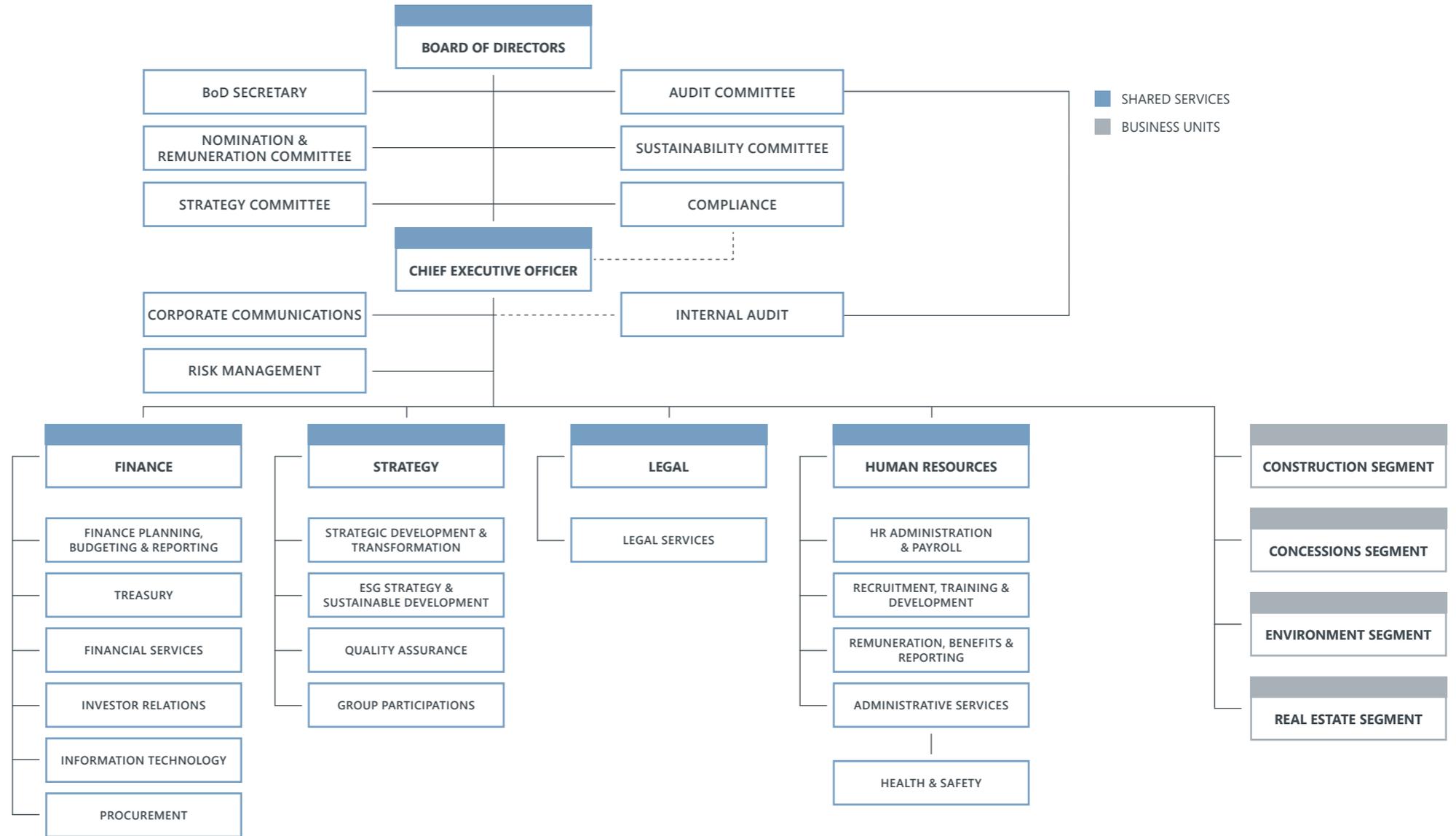


The Management of ELLAKTOR has established a strong and effective Corporate Governance System aiming at the successful implementation of the Group's strategy.

Organizational Structure

ELLAKTOR Group relies its operation on a modern and efficient model with the aim of sustainable and responsible development. It implements corporate governance practices related to the size, composition, duties and general functioning of the Board of Directors and its Committees. Due to the nature, but also the purpose, the complexity of the issues, the number of subsidiaries and joint ventures in Greece and abroad, the Company's Board of Directors has established Committees consisting of certain members and Senior Managers, in order to support the work of the Management, with supervisory, approval, coordination and advisory responsibilities.

At the following organizational chart, the main organizational structure of the Group and the main Committees as they were in force at the date of publication of this Report are presented.



More information on the administrative structure is presented in the Group's [website](#).

Corporate Governance Code

ELLAKTOR S.A. for the period from 01.01.2022 to 31.12.2022 applied the principles of Corporate Governance, as defined by the current relevant legislative framework (Law 4706/2020, Law 4449/2017 article 44, and Law 4548/2018 articles 152 and 153). These principles have been incorporated in the Greek Corporate Governance Code of the Hellenic Corporate Governance Council (June 2021), which the Company has adopted and follows.

The Hellenic Corporate Governance Code, which also embraces the Corporate Governance Principles of the Organization for Economic Cooperation and Development (OECD), is available at the [Company's website](#). The Corporate Governance Code of ELLAKTOR ensures the longevity and effectiveness of the Group's operation, safeguarding the interests of all stakeholders, while adhering to the principles of transparency, business ethics and responsible management of all resources.

The basic structure of the Corporate Governance Code includes: a) the General Principles, which form the general framework of corporate governance and summarize the guiding principles, and b) the Specific Practices, which elaborate on the General Principles and constitute "compliance or explanation" provisions and form the basis for the

preparation of the ELLAKTOR's Corporate Governance Statement. Any deviations from the Specific Practices of the Greek Corporate Governance Code are detailed in the [Annual Financial Report 2022](#) of ELLAKTOR, in the section "Corporate Governance Statement".

Board of Directors & Main Committees

The [Board of Directors](#) of the Company, whose members are elected by the General Assembly, administers and manages the corporate affairs, in accordance with the law and the Company's Articles of Association, represents the Company, decides on all matters concerning the Company, except for those matters for which the General Meeting of Shareholders has exclusive competence, in the best interests of the Company and its Shareholders. Being the highest governance body, it shapes the Company's strategy, oversees and controls the management of its assets.

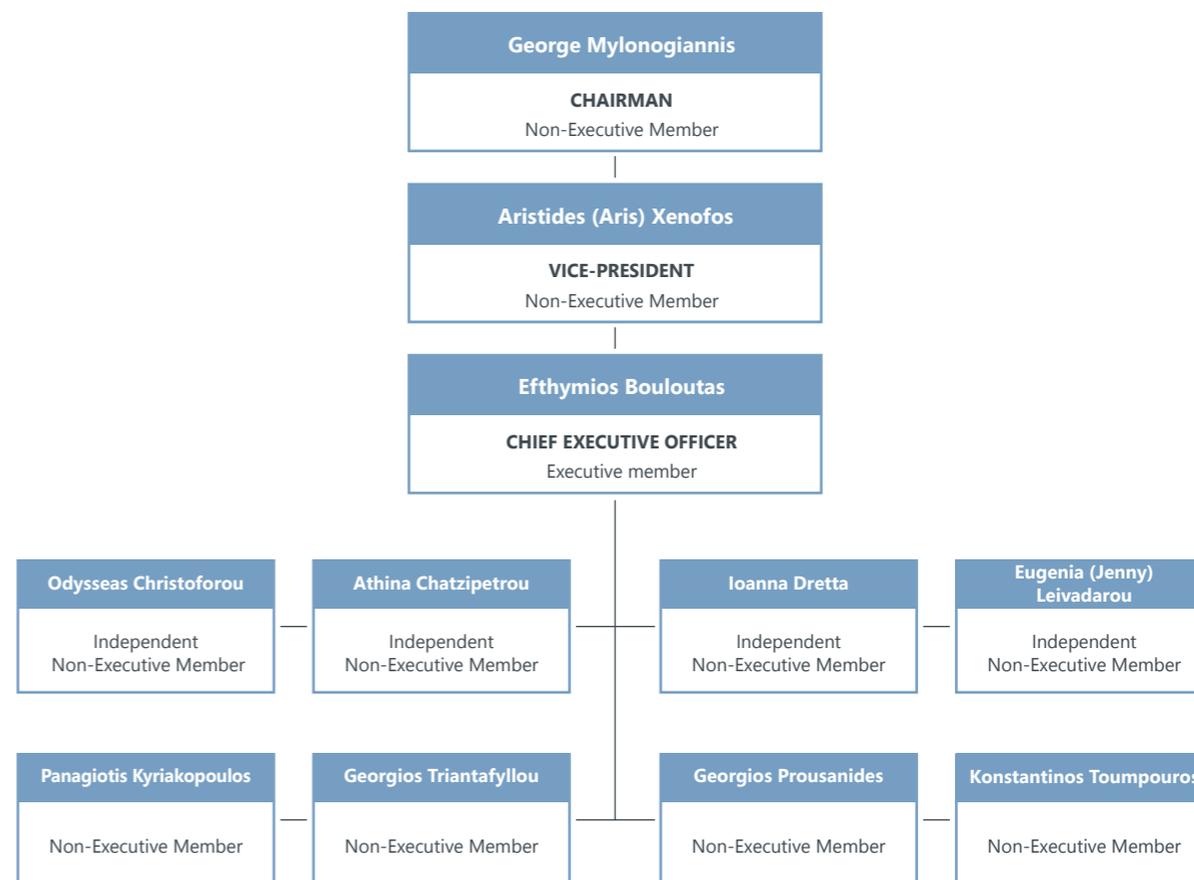
The roles of the members of the Board of Directors are clearly defined and documented in the [Company's Articles of Association](#), the Corporate Governance Code, the [Rules of Operation](#) and other official documents.

The tenure of Boards members is five years, expires on 27.01.2026, starting on the date of the election of the members of the initial Board of Directors, i.e. 27.01.2021 and expires with the election of the new members of the Board of Directors by the General Assembly of the year of expiry of their tenure, which cannot be extended beyond six years. It is noted that the tenure of the four additional members of the Board

of Directors expires at the same time as the tenure of the remaining members of the current Board of Directors of the Company.

The Board of Directors, in accordance with Article 7 of the Articles of Association, consists of five to eleven executive and non-executive members. The Board of Directors on 31.12.2022 consisted of eleven members, of which one executive and ten non-executive members, including four independent non-executive members, within the meaning of article 9 of Law 4706/20, as amended.

The **composition of the Board of Directors of the Company as of 31.12.2022** is shown in the following chart:



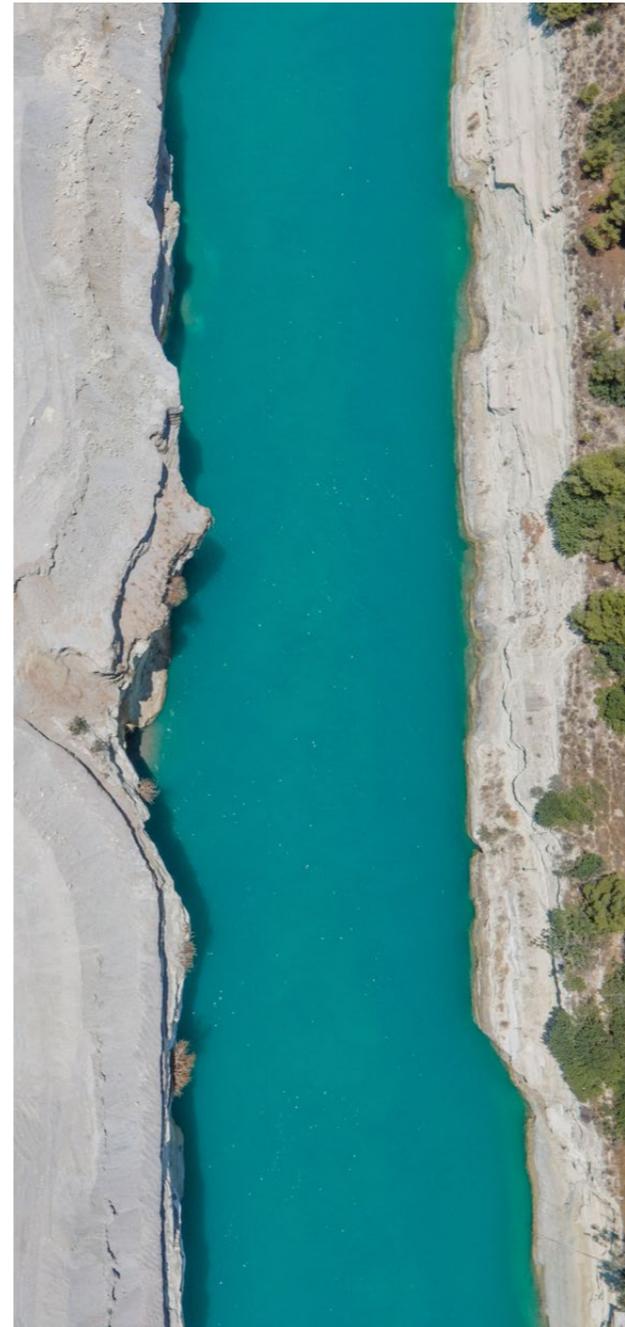


Although there is currently no stand-alone Diversity Policy for Board members, there is a relevant provision in the Suitability Policy. The Nomination and Remuneration Committee assists the Board of Directors, within the scope of its responsibilities, in setting diversity criteria for the selection of the members of the Board of Directors. The Company applies diversity and equality criteria to the members of the Board of Directors and to the administrative, management and supervisory bodies.

The Group complies at all levels with the applicable regulatory framework for the implementation of the principle of equal treatment, provides equal opportunities to all employees and candidates and avoids any kind of discrimination. The existing processes and structures have created a working environment in which both management and employees are evaluated and judged based on their education and professional experience, knowledge of the Company's subject matter as well as leadership skills, experience, efficiency and creativity. This framework promotes the application of international practices that respect human dignity, without discrimination or prejudice.

At the level of the Board of Directors, the above is reflected as follows: The aforementioned Board of Directors consisted of eleven members of Greek nationality, eight men and three women, four members aged 30-50 years and seven members over 50 years old. 36% of the Board members were independent, 91% of the Board members were non-executive, and 27% of the Board members were female. In addition, the roles of Chairman and CEO were not held by the same person.

Regarding the experience of the Board members in Sustainable Development matters, it is noteworthy that 8 out of the 11 members have experience and skills in this specific field.



Board of Directors



EVALUATION OF THE BOARD AND ITS COMMITTEES

With the support of the Nomination and Remuneration Committee, the Board annually evaluates the effectiveness of the Board and its Committees.

At intervals, the Board may engage external consultants to facilitate a thorough review of its effectiveness.

Board & Committee Meetings in 2022





AUDIT COMMITTEE

The purpose of the Audit Committee is to assist the Board of Directors in relation to the monitoring and supervision of (a) financial reporting, (b) internal control systems, (c) internal control, risk management and regulatory compliance units and generally in the effective governance of the Company and its subsidiaries under its control in accordance with the law and (d) the certified auditors under the provisions of article 44 of Law 4449/2017, as amended and in force and articles 10, 15 and 16 of Regulation (EU) 537/2014 of the European Parliament.

The composition of the Audit Committee during FY 2022 is presented in the table below:

Panagiotis Alamanos	Chairman of the Committee (Third Person - Independent)
Athina Chatzipetrou	Member of the Committee (Independent - Non-Executive Member of the Board)
Eugenia (Jenny) Leivadarou	Member of the Committee (Independent - Non-Executive Member of the Board)
Ioanna Dretta	Member of the Committee (Independent - Non-Executive Member of the Board)

More information on the composition and functioning of the Audit Committee can be found in the [website](#) of the Group and on the [Annual Financial Report 2022](#).

NOMINATION & REMUNERATION COMMITTEE

On 27.04.2021, the Board of Directors of the Company established the Nomination & Remuneration Committee, whose purpose is to assist the Board of Directors in implementing the Company's Remuneration Policy, in line with market trends regarding the level of remuneration and the human resources management, and to propose to the Board of Directors individuals suitable for becoming members of the Board of Directors when there is a need.

The composition of the Nomination & Remuneration Committee during FY 2022 is presented in the table below:

Athina Chatzipetrou	Chairman of the Committee (Independent - Non-Executive Member of the Board)
Aristides (Aris) Xenofos	Member of the Committee (Non-Executive Member of the Board)
Odysseas Christoforou	Member of the Committee (Independent - Non-Executive Member of the Board)
Eugenia (Jenny) Leivadarou	Member of the Committee (Independent - Non-Executive Member of the Board)

More information on the composition and functioning of the Nomination & Remuneration Committee is provided on the Group's [website](#) and in the [Annual Financial Report 2022](#).

STRATEGIC PLANNING COMMITTEE

By the decision of the Board of Directors of the Company dated 30.06.2022, the Strategic Planning Committee was established, which is responsible for evaluating and monitoring the execution of the Group's budget and business plan, processing proposals for new activities and investments, as well as exploring possible new areas of development.

The composition of the Strategic Planning Committee for FY 2022 is presented in the table below:

Efthymios Bouloutas	Chairman of the Committee (CEO - Executive Member of the Board)
Ioanna Dretta	Member of the Committee (Independent - Non-Executive Member of the Board)
Konstantinos Toumpouros	Member of the Committee (Non-Executive Member of the Board)
Panagiotis Kyriakopoulos	Member of the Committee (Non-Executive Member of the Board)
Georgios Triantafyllou	Member of the Committee (Non-Executive Member of the Board)

More information on the composition and functioning of the Strategic Planning Committee is provided on the Group's [website](#) and in [Annual Financial Report 2022](#).



SUSTAINABLE DEVELOPMENT COMMITTEE

By decision of the Company's Board of Directors, the Sustainable Development Committee was established, which during the FY 2022 consisted of the following members.

This Committee assists the Board of Directors and is responsible for approving, supervising, monitoring and implementing the Group's Sustainable Development Strategy and the roadmap for sustainable development, assessing the adequacy and effectiveness of the Sustainable Development Policy approved by the Board of Directors, and ensuring the adequacy of resources for its implementation. In addition, it oversees the actions related to the Group's sustainable development and the alignment of practices related to environmental and social issues with both the Group's sustainable development strategy and the policies approved by the Board of Directors.

George Mylonogiannis	Chairman of the Committee (Non-Executive Member of the Board)
Efthymios Bouloutas	Member of the Committee (CEO - Executive Member of the Board)
Eugenia (Jenny) Leivadarou	Member of the Committee (Independent - Non-Executive Member of the Board)
Aphroditi Avramea	Member of the Committee

More information on the composition and functioning of the Sustainable Development Committee is provided on the Group's [website](#) and in [Annual Financial Report 2022](#).



Corporate Governance Policies

The Board of Directors of the Company gives particular attention to Corporate Governance matters, aiming to adopt and operate systems and processes that enhance the Corporate Governance System. In this context, it has adopted a series of Policies, such as the Suitability Policy for Members of BoD, the [Conflict of Interest Policy](#), the [ELLAKTOR Board Remuneration Policy](#), the Corporate Governance System Evaluation Policy, the Rules of Operation of the BoD, etc. Practical implementation of those Policies is achieved through relevant procedures and forms.

Sustainable Development Governance

As ELLAKTOR Group considers as one of the most important issues the promotion of sustainability throughout its structure, including its supply chain, it has established a corporate governance

structure to oversee progress towards the ESG targets set and the integration of the concept of sustainability throughout the organization.

The Board of Directors of the Company is responsible for the adoption and approval of the Sustainable Development Policy, the approval of its revisions, and the supervision of its implementation by the Group's companies with the assistance of the Sustainable Development Committee and the ESG Strategy & Sustainable Development Division.

The purpose of the Sustainable Development Committee is to assist the Board of Directors in enhancing the Group's long-term commitment to increasing its positive impact on the economy, society and the environment, creating added value for all stakeholders. More information about the Committee can be found in the section "[Evaluation of the Board and its Committees](#)".

The ESG Strategy & Sustainable Development Division acts as the center for strategic planning and proposing to the Sustainable Development Committee and the Group's Management, regarding issues related to the environment, society and governance, implements the ESG strategy action plan in cooperation with the relevant Divisions and business units, prepares the Group's Annual Sustainable Development Report and monitors sustainable development indicators with the aim of their continuous improvement. The ESG Strategy & Sustainable Development Division is part of the Group's Strategic Development Division.

It is worth mentioning that in 2022, the Remuneration Policy was updated and performance targets related to sustainability, such as employee health and safety, digital transformation and corporate social responsibility matters, environmental and social matters, as well as governance, were added to the existing criteria of variable remuneration.



BOARD OF DIRECTORS



SUSTAINABLE DEVELOPMENT COMMITTEE



CEO



STRATEGIC DEVELOPMENT DIVISION



ESG STRATEGY & SUSTAINABLE DEVELOPMENT DIVISION

Regulatory Compliance

The Group aims to conduct its activities in an ethical manner with integrity and in compliance with applicable laws, regulations and standards, its policies and guidelines, as well as its Code of Ethics.

The Management ensures that the overall corporate activity is lawful, meets high standards of responsible business conduct and enhances the climate of trust between the Group and its stakeholders (employees, customers, suppliers, partners, administrative and regulatory authorities, etc.), through consistency in its principles and values and zero tolerance of actions related to compliance issues.

The main compliance risks that have been identified include potential adverse consequences resulting from unethical acts committed by the Group, its employees or business partners, the risk of legal or regulatory sanctions resulting in financial losses or reputational damage due to the Group's failure to comply with laws, regulations, rules, standards, relevant policies and procedures, guidelines and/or its Code of Conduct, risks related possible

violations of human rights or other environmental and social risk factors, risks arising from any ineffective handling of reports and from failed overseeing.

These risks are managed through relevant Policies, Management Systems, implementation of training programs on related issues and conducting scheduled audits.

Regulatory Compliance is an independent function that promotes good corporate governance practices and integrity standards in the Group. The mission of Regulatory Compliance is the effective implementation throughout the ELLAKTOR Group of a corporate spirit of integrity, with a clear emphasis on ethics, based on high standards of business conduct, transparency, confidentiality and regulatory compliance.

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

For this purpose, an Integrity Compliance Management System has been established

and implemented at Group level, which has been certified by an independent body according to ISO 37301:2021 (Compliance Management Systems).

In order to successfully implement the Integrity Compliance Management System, ELLAKTOR Group has developed an Integrity Compliance Program that includes Integrity Compliance Measures incorporated into its daily operations to ensure compliance with the applicable regulatory framework and to promote sound decision making.

In this context, ELLAKTOR Group operates the following:

- ▶ **Integrity Compliance Management System** which has been certified by an independent body with the new ISO 37301:2021 Compliance Management Systems, since 2021.
- ▶ **Anti-Bribery Management System**, which has been certified according to ISO 37001:2016 for at least the main subsidiaries of all segments. In particular, HELECTOR applies an Anti-Bribery Management System in accordance with ISO 37001:2016, which has been certified since 2017. Similarly, of the companies ELLAKTOR and AKTOR CON-

SESSIONS have been certified since 2020 and AKTOR, TOMI and REDS since 2021.

- ▶ **Whistleblowing Management System** that follows the guidelines of ISO 37002:2021. In 2022 it received assurance from an independent certification body, ensuring the implementation and management of an effective whistleblowing management system in accordance with international standards.



The Group aims to conduct its activities in an ethical manner with integrity and in compliance with applicable laws.



Integrity Compliance Program

In order to successfully implement the Integrity Compliance Management System, ELLAKTOR has developed an Integrity Compliance Program that includes Integrity Compliance Measures incorporated into the Group's daily operations to ensure compliance with all applicable laws and regulations and to make the right decisions on a daily basis.

To enable reporting of violations of the Code, policies, regulations and applicable legislation, the company has established multiple communication channels (phone, e-mail, reporting platform, etc.) which have been renamed as Talk2Ellaktor in October 2021. In addition, in early 2022, a [new whistleblowing platform](#) was launched (with the option to submit anonymous reports), in full compliance with European Directive 1937/2019. This platform is managed by an independent third-party.

Codes & Policies

For the implementation of the Integrity Compliance Management System, Policies and Codes are in place at Company and Group level, which include the principles and rules applicable at the Group. These Policies and Codes are an integral part of the Company's and Group's Internal Control System, which includes a number of additional policies and procedures beyond the Integrity Compliance Management System. Some of the most significant ones are listed below:

- ▶ **Code of Ethics**
- ▶ **Business Partner's Code of Conduct**
- ▶ **Anti-bribery policy**
- ▶ **Whistleblowing Policy**

It should be noted that the Code of Ethics and the Business Partner's Code of Conduct are available in 4 languages, Greek, English, Romanian and Arabic, in accordance with the Group's strategic planning and are accompanied by the respective Policies & Procedures.

The **Code of Ethics**, consists of a set of fundamental principles and rules that shape the way we act and behave in everything we do. It establishes ethical

standards, obligations and commitments on how we work, interact with each other, operate all together, as good corporate citizen and how we build and maintain trust.

The **Business Partner's Code of Conduct** explains what ELLAKTOR expects from its Business Partners in terms of business ethics, human rights, employee relations, health and safety, as well as other issues related to sustainable and responsible business practices

Anti-Bribery Policy

With the aim of strengthening integrity, transparency and zero tolerance in corruption matters, the Group and its subsidiaries have adopted an Anti-Bribery Policy and a Whistleblowing Policy since the beginning of 2020. These policies seek to reinforce the Group Management's commitment to zero tolerance for bribery, creating a framework of obligations and guidelines in order to be used as a tool for preventing, deterring and combating bribery.

The Policy applies to all Group companies and is binding on (i) members of the Board of Directors and individuals

holding managerial positions within the Group companies, (ii) Group employees, (iii) customers, suppliers and subcontractors, as well as anyone providing services to Group companies and (iv) any third party acting on behalf of the Group.

In 2022, there were no cases that reached the courtrooms regarding corruption and anti-competitive behavior against the Group or its employees.

Conflict of Interest Policy

The [Conflict of Interest Policy](#) aims to ensure compliance with a) the applicable legislative and regulatory framework governing conflict of interest situations and b) the Group's internal policies and procedures. It identifies conflicts of interest and the categories thereof, encourage the confidential reporting of any incident or reasonable suspicion through the available communication channels established by the Group and promotes awareness and vigilance among employees and partners in recognizing actions related to conflicts of interest situations.



Whistleblowing Policy

In order to provide a means of reporting any incidents of violation of the Code of Ethics, Policies and applicable legislation, the Group has adopted the Whistleblowing Policy, which sets out the principles and operating framework under which the Group receives, processes and investigates named and anonymous reports/complaints/critical concerns of irregularities, misconduct or other criminal acts brought to the attention of employees, customers or suppliers or other third parties. The Policy applies to all Group companies. Talk2Ellaktor provides multiple channels for raising concerns and/or reporting incidents in a secure and user-friendly way.

Reports may be submitted confidentially, or anonymously. All reports are treated confidentially and without fear of retaliation against anyone who raises a concern or reports a potential incident in good faith.

In 2022, there were no confirmed incidents of corruption and the Group did not terminate the cooperation with employees or business partners due to such issues.

The Board of Directors is informed on these matters when conducting its meetings on a case-by-case basis and annually.

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

Training

Employees of the Group regularly attend training and information seminars on compliance and integrity matters. In 2022, Integrity Training was conducted, focusing on the new Code of Ethics, the Integrity Compliance Program and the new whistleblowing platform (Talk2Ellaktor). This training was carried out at selected construction sites and subsidiaries in Greece and abroad. In particular, 358

hours of training were provided on Compliance and Ethics topics in 2022.

In accordance with the requirements of law 4706/2020 and the Board Member Training Policy, training was provided to ELLAKTOR Board Members on topics related to risk management and corporate governance. Additionally, training was provided to the Regulatory Compliance Officers of the Group's business segments and to Compliance Liaisons.

Since 2022, ELLAKTOR has been a corporate member of the Business Integrity Forum (BIF) of Transparency International Greece and of the ACFE Corporate Alliance of the Association of Certified Fraud Examiners.

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 2022, where required, policies and procedures relating to the deepening and strengthening of the data protection framework, in accordance with the General Data Protection Regulation, were reviewed in conjunction with developments in national legislation.

The Data Processing Register and the Data Protection Policy include all the principles that must govern any processing of personal data conducted by the Group, as well as the relevant obligations, the rights of data subjects, and 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 Data 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. All requests were processed within the legal deadline and there were no follow-up actions by the requesters.

No incidents of personal data breaches relating to the Group's customers or non-compliance with the General Data Protection Regulation were reported in 2022.



Employees of the Group regularly attend training and information seminars on compliance and integrity matters.

Risk Management

The Board of Directors places particular emphasis on the Internal Control System (ICS), of which risk management is an integral component, aiming at the adoption and implementation of Risk Management Policies and Procedures that ensure the smooth operation of the Company and the Group in general and the achievement of business objectives, as well as the preparation of the financial statements.

The Head of the Risk Management Division reports directly to the CEO and through him to the Board of Directors, providing impartial reports and updates on risk-related matters, the level of compliance with risk policies, the results of the review of the risk identification and assessment process, the operation of risk management and response procedures of ELLAKTOR to these risks (risk response), and the results of risk monitoring, providing comprehensive information on the Group's risk profile.

The scope, size and complexity of the Group's activities require a sophisticated approach to risk assessment and management. Preventing and effectively managing risks is an important factor in the Group's Strategy, in the

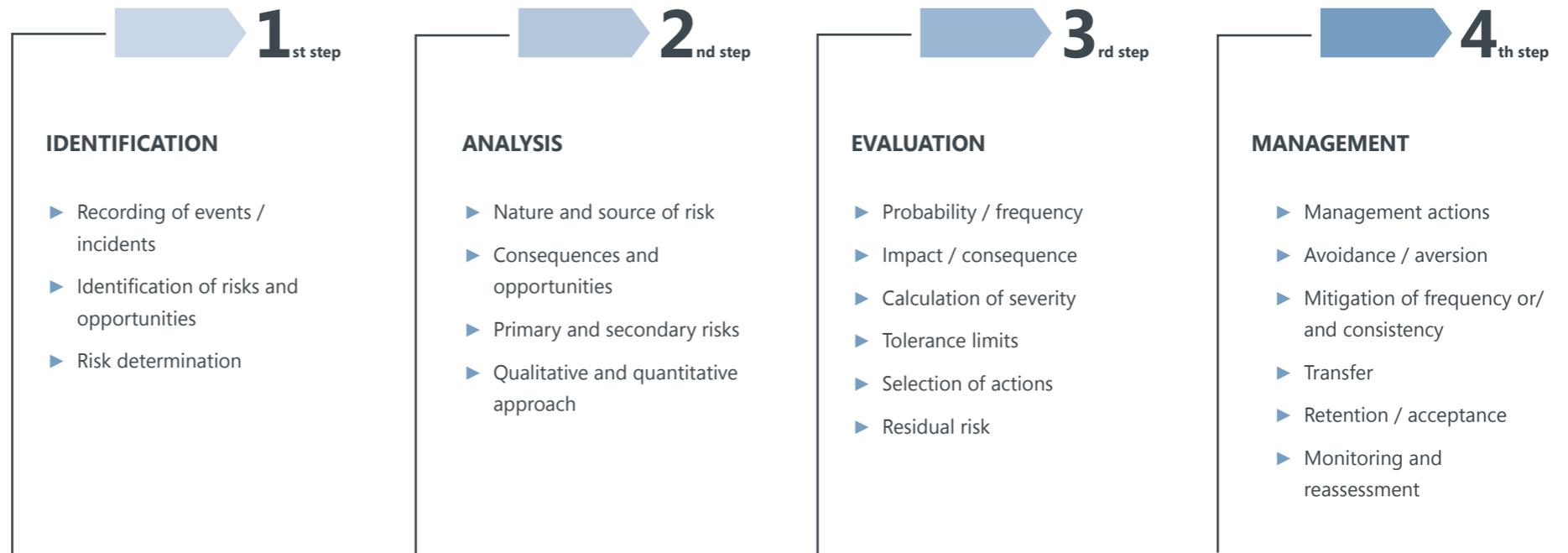
context of an investigative approach to incidents to identify and highlight either threats or opportunities.

For the transparent, safe and reliable operation of companies, regarding the management of business risks, Greek legislation has incorporated guidelines and provisions of the European Parliament and Council such as (EU)2017/828 & 2017/1131. The Group is fully aligned with the current institutional and legal framework (Law 4706/2020 and Hellenic Capital Mar-

ket Commission resolution 1/891/30.9.2020) and implements the relevant directives. Furthermore, it has integrated the principles of ISO 31000:2018 & ISO-IEC Guide 73, as well as best practices in its relevant procedures.

In this context, an enterprise risk assessment methodology tailored to the needs and business profile of the Group's has been adopted, promoting a unified culture that integrates risk management across pro-

cesses, activities and decision-making at all levels. This methodology is followed by all business activity segments, central services and functional units and includes the following steps:



Risk management includes all processes, methodologies and procedures for the identification, recognition, analysis, evaluation, assessment and management of risks related to the Group's overall activities. It is a dynamic and continuous process implemented in a coordinated manner by all personnel, regardless of their hierarchical level, for the effective management of corporate risks. It manages all identified and assessed risks (recorded in the Risk Register), while potential new risks are constantly detected, in the context of the risk appetite approved by the Board of Directors. The aim of the overall effort of effective risk management is - as far as possible - to minimize unexpected deviations from corporate objectives.

The Board of Directors utilizes the Internal Control System in order to protect the Company's assets, to ensure operation within the Code of Ethics, with emphasis on integrity -through the Regulatory Compliance function-, to assess the emerging risks from all operations and to provide accurate and comprehensive information to shareholders on the Company's actual situation and prospects, recording and providing information on the Company's risk profile, as well as on the methods for dealing with the risks identified. Internal Control confirms the ad-

equate and effective operation of both Regulatory Compliance and Risk Management.

Management oversees the systematic identification and assessment of risks affecting business activities. In addition, it approves the formulation and timely implementation of risk management plans, following a cost-benefit analysis. It regularly assesses the effectiveness and the need to adjust risk management plans in order to achieve optimal management.

Group companies that have developed ISO management systems, which incorporate a risk-based thinking approach, identify potential threats and opportunities related to their activities, and take them into account when planning their strategic objectives. The usual ways address risks are: prevention, mitigation (frequency and/or impact reduction) and transfer, to ensure that the residual risk is acceptable. The main risks recorded fall into the following main categories: geopolitical/market, financial, social/H&S/human resources/reputation & clientele, technological, legal/compliance and environmental.



Strategic Risk refers to the Group's business choices that are affected by more general external risks that are taken into account during decision-making and relate to the political and economic systems of societies, government changes and policies that lead to unrest or population movements, changes in legislative frameworks, imposition of sanctions, military engagements, creating an ever-changing external environment that can pose a threat to the Group's operations, through their impact on the supply chain, financial performance of operations and the safety of employees and partners.

The Group mitigates this risk by ensuring regular provision to the Management of the required timely, accurate and documented information, with parallel feedback on the progress and development of important projects and/or the implementation of decisions. Recognizing that the quality of the information and data provided to support a decision is reflected in the quality of the decision, Management analyzes the risks inherent in its strategic choices with the help of experts and consultants, taking over calculated risk within the acceptable levels - as defined by the Group's risk appetite. Also, the acceleration of the implementation of more general projects related to the establishment of procedures for monitoring and control of operations with the involvement

of IT used, is evident that significantly upgrades the internal environmental conditions where the executives are called upon to take the decisions for which they are responsible.

Financial Risk generally refers to anything that has a

direct impact on the financial statements and affects the results of the Group. It is addressed through the development and establishment of relevant procedures for each function of the Financial Division, with emphasis on the collection of audited data for the prepa-

ration of financial statements (including the income statement and cash flow statements), the recording and management of assets, the processing and payment of all kinds of expenses, compliance with tax legislation, cash management and the coordinated management of the Group's overall relationship with the Banks (renegotiation of pricing and other terms of cooperation, in order to optimize the benefit for the Group), as well as monitoring of cash flows by activity.

More specifically, targeted actions are taken to address:

- ▶ **for liquidity risk:** by planning cash needs on a weekly basis and on a 30-day rolling period, and on a monthly basis, by determining liquidity needs for a six-month period, in accordance with similar procedures in the Accounting Department,
- ▶ **for interest rate risk:** hedging for almost all long-term borrowing
- ▶ **for exchange risk:** it is eliminated by linking receivables with liabilities in the same currency (e.g. linking claims with loan repayment in the same currency); and
- ▶ **for credit risk:** it is limited because the Group counterparties are mainly government entities and a small number of credit-tested individuals.





IT Risk relates to the security of networks, information and operating systems, the security and integrity of data, the safeguarding of sensitive information, and the smooth operation of business activities. A potential breach would affect the Group's reputation, its smooth operation and its overall competitive position. In addition, a potential cyber-attack could potentially have a negative impact on the financial condition and operating results, in addition to the loss of time.

The Group has developed an information security framework through which it aims to provide optimal protection of information systems and data. An IT Policy has been established, which is in line with the Group's medium-long-term strategic plan, as well as corresponding procedures that define the investment plan in this field for the secure support of business objectives, by developing programs to enhance data and application security, with the assistance of external partners, as well as the development and establishment of a disaster recovery program (disaster recovery within the framework of the business continuity plan), which is tested and updated/improved on a regular basis, depending on the business needs. At the same time, there is a continuous and structured awareness and training program on information security issues, which is applied throughout the Group, so that all employees understand the IT risks, along with the need and the responsibility they have for the security of data, systems and operations.

Reputation Risk, refers to the damage caused to the corporate reputation by fake news, incorrect information and perceptions about the Group's operation, mission and values, unfortunate events, possible communication mistakes through the Group's communication tools, such as the official website, social networks, etc. According to the Group's principles, customer service, excellent and mutually beneficial relationships with partners and the contribution to the prosperity and development of the local communities in which it operates are its main concern and objective. In addition, the Corporate Communications Division has designed and implements Policies and Procedures that aim to align the entire organization with the approved communication strategy, ensuring proper communication with all stakeholders, with a view to protecting the corporate reputation.

Health & Safety Risk is important because it affects human life. Health and safety as a good is a fundamental concern of the Group, which is integrated in all its strategic choices and decisions and is embedded in the whole range of its activities. The Group is constantly investing to safeguard and protect health and safety. In relation to this risk, a detailed report on the Group's management/response is provided in the [Society](#) section.

Environmental Risk refers to intense weather events or long-term environmental changes, to transition risks related to extensive political, legal, technological changes and climate change adaptation and mitigation measures, and to the organization's successful transition to a lower-carbon economy by making the necessary operational adjustments. A detailed report on the Group's management/response to this risk is provided in the [Environment](#) section.

Regulatory Compliance Risk refers to the failure to maintain legal and regulatory compliance at the business, contractual, labor, social, environmental and product (product or service) levels. A detailed report on the Group's management/response to this risk is provided in the section "[Regulatory Compliance](#)".

Operational Risk lurks in every function of the organization, as a result of incorrect or deficient procedures with the absence of adequate safeguards. It is addressed by creating procedures for all Group activities and functions with the required principles of dual control and segregation of duties built in. In particular, the processes are developed with the participation of IT, in order to fully set the required safeguards / control mechanisms to prevent or mitigate risks through a lean and digital process. At the same time, the appropriate and targeted training of staff on these issues enhances the implementation and proper compliance with them, achieving prevention and mitigation of the relevant risks.

More generally, risk management is a fundamental function for the Company and its subsidiaries to ensure their viability and the uninterrupted achievement of business objectives, investing in their effectiveness, continuously and persistently (conducting training programs for all staff in business risk management). In addition, the Company's and its subsidiaries' familiarity with risk management, makes it more capable and effective in crisis management, because it acquires the necessary experience and knowledge to deal with unforeseen situations.



Business Continuity

The Group started in October 2022 the process of developing a Business Continuity Management System according to ISO 22301:2019 - Business Continuity Management, with the aim of its completion within 2023 and its certification by a certification body. This certification confirms the uninterrupted continuity of ELLAKTOR's activities and its contact with all its projects and its ability to prevent any malfunctions and to protect itself from the consequences of possible exceptional events.

INFORMATION SYSTEMS

The Group applies an ISO 27001-certified Information Security Management System that aims to protect the confidentiality, integrity and access of corporate information. The Information Security Management System, consisting of Policies, Procedures and Systems, manages the level of operational risk arising from the Group's dependence on information systems and ensures, to the fullest extent possible, the accuracy of the financial information provided.

The 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

At the same time, the Group's IT infrastructure includes specialized technical systems and security mechanisms, such as:

- ▶ New generation firewall
- ▶ Intrusion Prevention System (IPS)
- ▶ Internet access protection system
- ▶ System for workstation protection against advanced malware
- ▶ Email security system
- ▶ Access control mechanism at network level
- ▶ Vulnerability tracking mechanism for information systems
- ▶ Event correlation and security incident tracking system

Technical security systems are monitored on a continuous basis (24x7) through a dedicated cybersecurity service, in order to minimize the time to detect and respond to security incidents.



At the same time, the Group develops and maintains Business Continuity Plans to ensure the uninterrupted operation of all critical information systems and, by extension, its critical functions, following a potential disaster. Business continuity plans are approved by the Management and are regularly evaluated, in order to reflect, to the maximum extent possible, the actual operational picture of the Group at both technical and organizational level. The methodology used to plan and implement business continuity is based on the following principles:

- ▶ the strategy is aligned with the Group's objectives and priorities,
- ▶ the Group's critical functions are defined and categorized based on their priority for the Group's business activities,
- ▶ the information resources that support the Group's critical functions are identified and the maximum recovery time is determined, as well as the required technical procedures (Disaster Recovery Plan),
- ▶ the risks faced by the above information resources and the business implications of the realization of the relevant threats are identified and

used in the preparation of Business Continuity Plans.

EMERGENCY PREPARADNESS & RESPONSE

In cases of emergency situations, the Group's competent Divisions coordinate their actions in cooperation with executives of the subsidiaries, depending on the circumstances. The Group's objective is to eliminate accidents, incidents, and emergencies and ensure the continuation of the normal operation of the project/activity after each incident, minimizing any impact of an incident on people, the environment and the local community.

With the Group's certification according to ISO 22301:2019 — Business Continuity Management, which will be completed in 2023, ELLAKTOR emphasizes in the organizational recovery capability through coordinated organizational actions, i.e. the Group's ability to prevent or treat malfunctions in time and to protect itself from the consequences of possible disasters in order to continue to provide its products or services without interruption.

In the context of organizing a safe working environment, Health and Safety Management Plans (H&S Management Plans) are drawn up before the commencement of work on 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),
- ▶ Emergency Response Plan (ERP),
- ▶ Emergency Response Team (ERT),
- ▶ Group Health and Safety Guidelines and Procedures (HSG, HSP).

The ERP part of the HSMS is designed by mapping out all potential Emergency Hazards with their response instructions in order to achieve an orderly 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



Adverse weather conditions



Earthquake



Leakage of Harmful Substances



Pandemic

In addition, the Group has an emergency response plan, which is activated in the event of an environmental incident and emergency response teams are appointed at the projects where the Group operates to intervene and deal with any emergency situation. Emergency plans include actions to deal with a marine incident, flooding, oil/grease/fuel/liquid or hazardous waste spills and adverse weather conditions.

The Emergency Response Plan, which describes the management of emergencies or potential environmental accidents, describes the materials and resources required, the contact persons for each incident and how to communicate internally and externally.



CONCESSIONS SEGMENT

An emergency incident should be assessed and dealt with, immediately by the Emergency Team, depending on the degree of severity and always in accordance with the ERP. After each incident, the plan is reviewed and changes and revisions may occur.

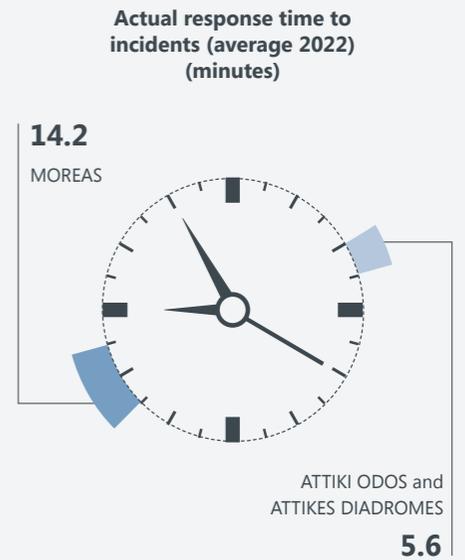
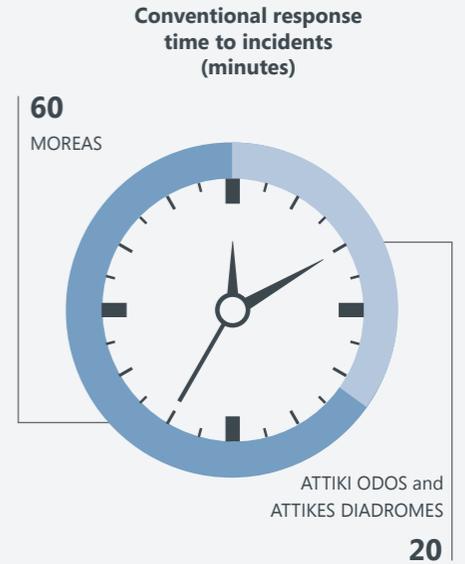
The Emergency Response Team of each project/activity is trained to deal with potential risks (such as fire, accidents, earthquake), conducts emergency preparedness drills and in the event of an incident recommends the assistance of external agencies or services if required (depending on the extent and severity of the situation) such as the National Center for Emergency Care, the Fire Brigade, 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.

In order to control traffic and handle incidents on the MOREAS and ATTIKI ODOS motorways, there is cooperation, where appropriate, with all the competent bodies (Hellenic Police, Fire Brigade, National Center for Emergency Care, Civil Protection, etc.), as well as with the State Agencies that oversee each project

and its operation, the Region and the Municipalities through which the motorways pass. It is noted that all actions of both companies are always carried out in accordance with the duly approved Operating Manuals applicable to each Concession Project. Large scale drills take place in the motorway's tunnels, where response times and the efficiency of the involved bodies is examined, while any possible problems are recorded, and corrective actions are proposed. In 2022, in Moreas, a preparedness exercise was successfully carried out in the "Ioannis Kapodistrias" tunnel in Sterna, in the direction to Athens, with the participation of the Fire Brigade, the Hellenic Police, the National Center for Emergency Care, Moreas SA and voluntary organizations (Greek Rescue Team of Arcadia, Red Cross -Tripoli Chapter - and O.F.K.A.F. - Nafplio Chapter). The exercise was under the auspices of the Civil Protection Directorate of the Peloponnese Region.

The main premises of ATTIKI ODOS and ATTIKES DIADROMES, at Paiania, Attica, and of MOREAS, at Nestani, Arcadia, have been verified as Independent Civil Defence Institutions by the Ministry of Interior. MOREAS has already since 2019 an approved "Regulation of Internal Operation from the point of view of Civil Defence" and is audited annually for this purpose by the Competent Agencies of the Hellenic Police.



Certified Management Systems

In order to ensure transparency in all its activities, as well as more efficient operations, ELLAKTOR Group has developed procedures and Management Systems, which have been certified according to international management standards. In this way, in addition to compliance with the applicable legislation, the Group's continuous improvement and reliability is ensured, while multiple benefits are provided in terms of safe working conditions, environmental protection and enhanced productivity and sustainability.

The Group's companies have developed Management Systems and received certifications in accordance with the following standards, where applicable:

- ▶ **ISO 9001 Quality** Management System
- ▶ **ISO 45001 Occupational Health and Safety** Management Systems
- ▶ **ISO 14001 and EMAS Environmental Management Systems**
- ▶ **ISO 50001 Energy** Management Systems
- ▶ **ISO 39001 Road Traffic Safety (RTS)** Management Systems
- ▶ **ISO 37000 Governance of Organizations**
- ▶ **ISO 37001 Anti-Bribery** Management Systems
- ▶ **ISO 37301 Compliance** Management Systems
- ▶ **ISO 37002 Whistleblowing Management** Systems
- ▶ **ISO 41001 Facility Management** System
- ▶ **ISO 27001 Information Security** Management Systems
- ▶ **ISO 22301 Security and Resilience — Business Continuity** Management Systems
- ▶ **ISO 20000 Information Technology** — Service Management System





TABLE OF CERTIFIED MANAGEMENT SYSTEMS

COMPANY	ISO 9001:2015	ISO 45001:2018	ISO 14001:2015	ISO 50001:2018	EMAS III	ISO 39001:2012	ISO 37000:2021	ISO 37001:2016	ISO 37301:2021	ISO 37002:2021	ISO 41001:2018	ISO 27001:2013	ISO 22301:2019	ISO/IEC 20000-1:2018
Percentage of 2022 turnover of the total (%)	46	61	67	61	31	9	100	35	100	100	2	37	2	2
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 FM 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 COMMERCIAL & TOURIST S.A. (Smart Park)	■		■											

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

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



Supply Chain

Percentage of purchases from local suppliers

93%

GREECE

89%

ABROAD

90%

ROMANIA

79%

QATAR

86%

GERMANY

89%

CYPRUS

The Group, through its cooperation with its suppliers, aims to fully meet its needs and achieve the optimal 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 2022, 92% of Group companies' supplies came from domestic suppliers. Domestic suppliers are defined as those suppliers whose headquarters are located in the country where the Group's respective activity takes place, while significant locations are defined as the countries of activity that are included in the scope of this Report.

PROCUREMENT MANAGEMENT

According to the existing procurement procedures and practices, procurement is carried out on a company and/or project basis, based on predetermined specifications and market research and taking into account the specific local procurement needs. Procurement from non-registered suppliers is excluded, apart from fully justified exceptional cases. For supplies worth €100,000 or more, the supplier must be approved at least in terms of the Group's regulatory compliance criteria.

With the aim of centralized procurement management, a Group Procurement Division has been estab-

lished and operates. This Division collaborates with the other Group Divisions, as well as with the Procurement Departments of the companies and projects, in order to monitor and meet their needs. The Division undertakes purchases involving more than one company/joint venture and/or projects of the Group, seeking to reduce costs based on economies of scale. In addition, it monitors market trends in materials and advises the companies accordingly.

The Group's companies use suppliers depending on their activities. For example, the Construction segment mainly uses technical companies, steel reinforcement suppliers, earthworks subcontractors, subcontractors for electromechanical works - installations, steel structures, concrete, fuels, cement products, elevators, aluminum structures, etc. The Environment segment cooperates with manufacturers-suppliers of mechanical equipment, suppliers of geotextiles & geomembranes, earthworks subcontractors, electromechanical subcontractors, etc. Similarly, companies in the Concessions segment mainly collaborate with maintenance contractors, software and maintenance companies for Toll and Traffic systems, companies providing money transfer, security services, and services for the preparation and distribution of subscriber bills, as well as suppliers of electrical materials and road safety equipment.

SUPPLY CHAIN RISK MANAGEMENT

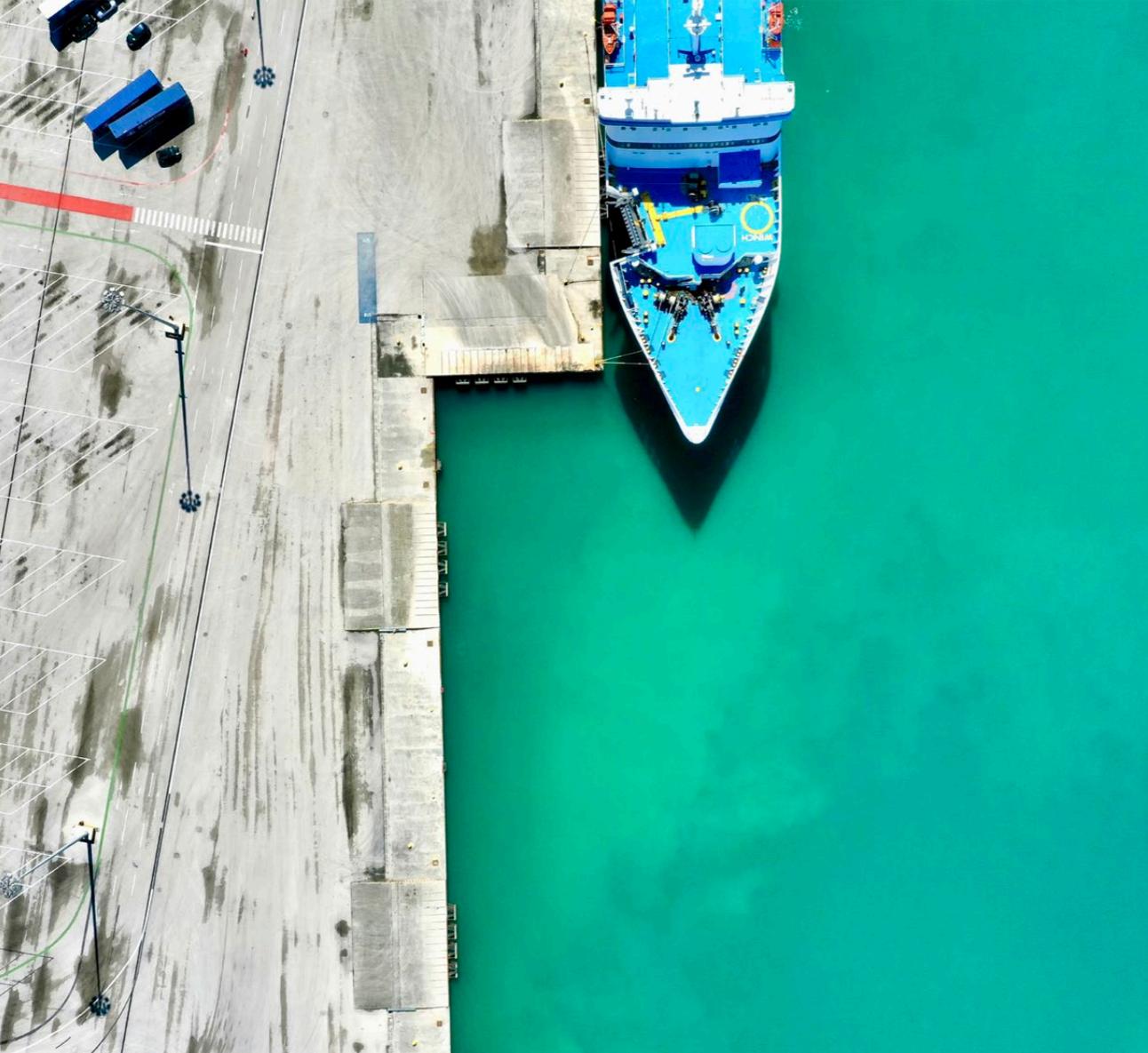
The Group monitors, assesses and revises the impact level of various risks associated with the supply chain.

In mid-2022, a reassessment of these risks was carried out, and their impact level was revised.

Among other events that significantly affect the achievement of the Group's strategic goals and have a significant impact on its operation, potentially its reputation, as well as the continuity of its business, the following were also recorded in relation to the supply continuity:

- ▶ Interruption of goods flow due to unavailability (interrupted continuity).
- ▶ Inability of approved suppliers to execute supply contracts.
- ▶ Absence of framework agreements for some of the important goods.

The criticality and primarily cost-related impacts of the above during 2022 have become particularly apparent due to the geopolitical environment.



SYSTEMS AND PROCEDURES FOR SUPPLY CHAIN DUE DILLIGENCE

In accordance with existing procurement procedures and practices, procurement is carried out on a company and/or project basis, based on predetermined specifications and market research and taking into account the specific local procurement needs.

Suppliers/subcontractors are selected through an open market research and request for product specifications and quotations from at least 3 different suppliers/subcontractors. From the offers received, the one representing the best quality/price ratio and delivery/response time is selected.

The Procurement Division and the Group's individual Procurement departments have recognized the existence of risks related to the supply chain and the subsequent negative impacts of these risks and have initiated actions to manage them.

ELLAKTOR Group has created a special "[Business Partner's Code of Conduct](#)" which includes the description of the minimum requirements/expectations from the third-parties with whom it cooperates, including its supply chain, on matters related to responsible business and sustainable development. The Code is a fundamental prerequisite for the commercial cooperation between the two parties and is aligned with the Global Sustainable Development Goals.

It is worth mentioning that the Group has acquired an internationally recognized tool to enhance the

third-party due diligence process for all its segments of activity. This tool includes a risk-based assessment process of business partners, but also their continuous monitoring during the business relationship, and focuses among other things on issues of corruption & anti-bribery, negative information or sanctions related to cyberspace, environment and society, etc.

More specifically, AKTOR and HELECTOR, through their cooperation with their suppliers and subcontractors, aim to fully cover their needs and the optimal quality of their final projects, products and services. At the same time, they focus on supporting local suppliers and subcontractors where feasible, thus strengthening the local market.

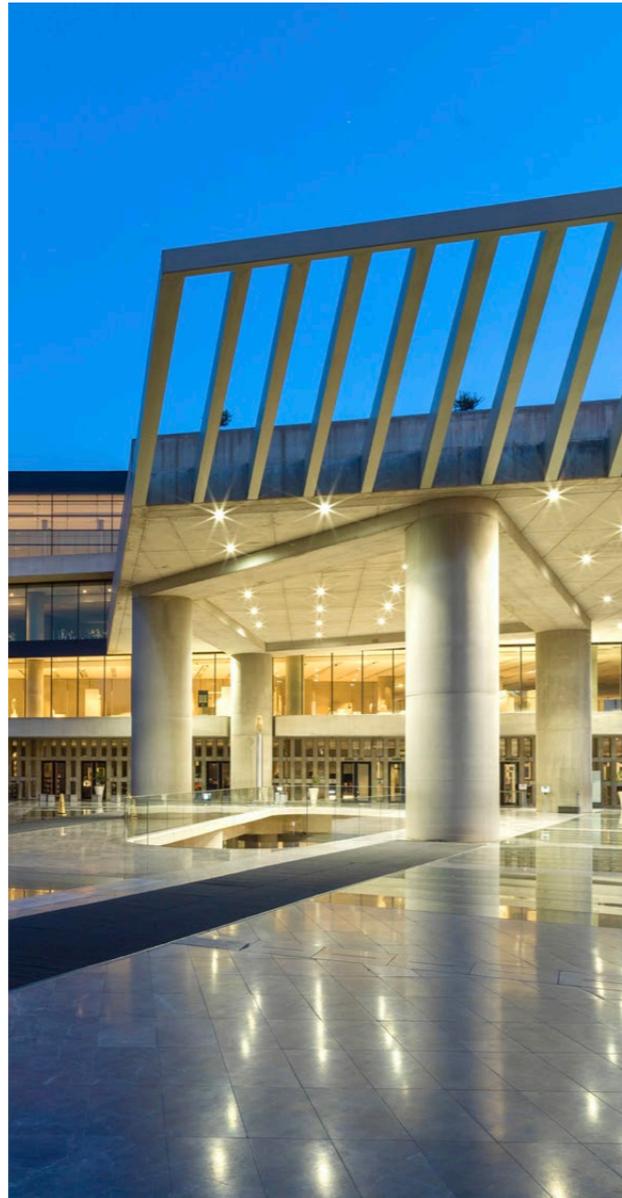
In addition, a new ERP system (DANAOS-PROJECT VIEW) has been installed and is in the development and optimization phase. It will initially operate for AKTOR and HELECTOR. This new system will be linked to SAP which will facilitate the accounting department in the entry of invoices and the correct monitoring of payments.

In 2022, there was no information or suspicion of human rights violations by the Group's approved suppliers.

Innovation & Digital Transformation

Innovation

For ELLAKTOR Group, strengthening innovation is an integral part of its strategy, accelerating the transformation of the business segments in which it operates. In order to develop innovative solutions and scale them appropriately to yield the expected benefits, the Group works closely with all business segments, focusing on research projects and partnerships that have applications to all 5 business segments. Specifically, in both the Construction and Real Estate Management and Services segments, it supports the creation of “smart” buildings designed based on the principles of the circular economy using innovative materials in terms of their properties. More analytically, initiatives are being implemented for the optimal use of natural resources and raw materials in projects, fostering the culture of reuse and recycling while saving energy. In the Concessions segment, the aim is to install “smart” operating models as a response to the immediate and effective management of emergencies or accidents. In the Environ-



ment segment, the focus is on waste management and the reuse of energy. Lastly, in Renewable Energy segment, it targets new technologies, mainly offshore wind farms, flexible energy storage methods and floating photovoltaic systems.

For this purpose, the Group participates in research programs and seeks new partnerships with technology companies and universities in order to be able to transfer know-how from the research stage to the operational stage under real conditions. The main areas of interest include the use of BIM (Building Information Modelling) technologies for creating a digital representation of the building (digital twin building), floating photovoltaic systems, as well as the application of robotic technology, both in emergency response to critical infrastructure incidents and in routine maintenance and repair.

In more detail, in 2022 the Group participated in the submission of 8 proposals for EU funded projects and one proposal for a project funded by the Norwegian Development Fund with a total budget for the Group exceeding €1 million. These proposals concerned the green development of maritime transport, the use of robotics in the maintenance of remote critical infrastructure, the creation of a digital identity for buildings and smart mobility services for people and goods.

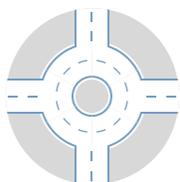
A tangible benefit from research projects recently completed by Group’s companies is the fact that the solutions have proven to be economically viable and investment-efficient, thus opening the possibility for scalable application after the submission of a patent application to the Hellenic Industrial Property Organization.



For ELLAKTOR Group, strengthening innovation is an integral part of its strategy, accelerating the transformation of the business segments in which it operates.

Research projects

The research projects in which Group's companies participate, seeking innovative solutions that will improve their operation, while developing new products and services, are presented below.



The Concessions segment participates in 4 research projects through the companies ATTIKES DIADROMES and MOREAS. Specifically, ATTIKES

DIADROMES participates in 3 research projects within the framework of European research programs and MOREAS participates in a long-term research program in collaboration with the National Technical University of Athens (NTUA).

C-ROADS RESEARCH PROJECT ON COLLABORATIVE, INTELLIGENT TRANSPORT SYSTEMS

Since 2019, ATTIKES DIADROMES has been participating in the European research project **C-ROADS**, which is expected to be completed within 2023. The project falls under Investment Priority 3: "Intelligent Transport Services for road (ITS)" and specific goal 10 "Cooperative, connected and automated mobility - cooperative ITS and automation". The objective of the C-ROADS is the research, development and piloting of collaborative intelligent transport systems (C-ITS) on parts of the country's main roadways and harmonization with corresponding pilot tests in other member states through the C-ROADS platform, ensuring its inter-operability. It contributes to creating a sustainable transportation system and improving road safety through a more efficient use of infrastructure both in terms of road and freight transport.

PRECINCT RESEARCH PROJECT FOR ENHANCING CYBERSECURITY OF CRITICAL INFRASTRUCTURE

In addition, since 2021, ATTIKES DIADROMES has been participating in two European research projects that are part of the Horizon 2020 program which are expected to be completed within 2023. Specifically, the **PRECINCT** project ("Preparedness and Resilience Enforcement for Critical INfrastructure Cascading Cyberphysical Threats and effects with focus on district or regional protection") focuses on EU critical infrastructure, which is increasingly at risk from physical cyber-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/organizations. The pilot applications in Greece will be at a simulation level for Attiki Odos, Athens International Airport, and Attiko Metro.

FRONTIER RESEARCH PROJECT ON TRAFFIC MANAGEMENT

Similarly, **FRONTIER** (“Next generation traffic management for empowering CAVs integration, cross-stakeholders collaboration and proactive multi-modal network optimization”), involves a total of 18 companies and organizations from Europe. It aims to provide integrated strategies for future traffic management, taking into account new types and modes of transport with automated vehicles, minimizing pollution and congestion points, reducing accidents, and the need to lower 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. Pilot tests with simulations will also be conducted in Attiki Odos, Oxford and Antwerp.

RESEARCH PROJECT IN COLLABORATION WITH NTUA

Lastly, since 2012, MOREAS has been participating in a research project titled “Monitoring and Assessment of the functional condition of Moreas motorway pavements”, conducted by the research team of the Pavement Engineering Laboratory of the National Technical University of Athens. The aim of the research project is, on the one hand, to support MOREAS regarding preventive actions and decision making in the context of motorway pavement maintenance management, and on the other hand, to enhance research related to the operation of these pavements. It should be noted that this project is a continuation of the research project “Development of a plan for monitoring and evaluating the structural and functional condition of the pavements” during which the platform for monitoring and assessing the motorway pavements was developed. The annual results report is the deliverable of the research project and contains the results of the analysis and evaluation of the data collection derived from field measurements of the structural and functional characteristics of the pavements during each year. The Pavement Monitoring System of the NTUA’s Pavement Engineering Laboratory is used for the measurements and field research work, which consists of sophisticated, high-technology systems belonging to the category of Non Destructive Testing (NDT) systems.





FLEXITRANSTORE RESEARCH PROJECT

The RES segment is participating in the European Commission's research project. This project involves the creation of a multi-tool energy platform primarily aimed at controlling 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 in the project is the Spanish company JEMA ENERGY S.A. The project is currently in the final commissioning stage and test charging and discharging of the batteries are carried out. These tests are used to control the settings and communications between the system controllers, the data measurement points of the High Voltage Network and the Battery Control and Operation System. As part of the completion of the transaction of the Group's RES segment with MotorOil (MORE), this research project will be transferred to the new company (Anemos RES), as the platform implemented is part of this transaction.



UV-LEACH AND PROMOTE RESEARCH PROJECTS

The Environment segment participates in 2 research projects which are included in the "RESEARCH-CREATE-INNOVATE" action of EPAnEK. 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 of Thessaloniki. The treatment of waste with high pollutant load, such as landfill leachates, is one of the most significant challenges nowadays. The aim of the project is to maximize the reduction of the pollutant load of the treated leachates, through innovative anti-pollution technologies, taking into account the investment costs, as well as the operational costs, with the ultimate goal of minimizing the environmental footprint of the treated leachates of the landfills.

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", started in 2020 in collaboration with the University of Thessaloniki. The project is a new model for the treatment of landfill leachates but based on zero-cost raw materials, derived from agri-food and other residues, contributing to the circular economy by reusing waste and residues into the life cycle.



BIOGASUP RESEARCH PROJECT

The Construction segment participates in 1 research project through maintenance and operation of wastewater treatment plants.

A research project is being implemented at the wastewater treatment plant in Kalochori, Thessaloniki, with the title: "Biogas upgrading with simultaneous recycling and utilization of carbon dioxide for the optimization of anaerobic sludge treatment", with the acronym "BiogasUp" in collaboration with the Hellenic Agriculture Organization - Dimitra (ELGO-DIMITRA). This research project is implemented under the National Scope Action "Research - Create - Innovate (2nd Cycle)".

"BiogasUp" aims at the holistic investigation of an innovative system for the simultaneous upgrading of biogas using inorganic membranes and increasing the amount of biogas produced through recycling and utilization of the waste CO₂ for sludge pretreatment.

The project is expected to be completed in mid-2023 and consists of 5 Work Packages (WPs). "BiogasUp" aims to develop and optimize renewable energy production technology from biomass, emphasizing the production of high-value second-generation biofuels (biomethane), thus opening new horizons in the utilization of biogas beyond conventional combustion. The results of the project will provide a common reference point for all members of the biogas production and municipal waste treatment supply chain.

It is worth mentioning that based on the feasibility and development study (scale-up) of the research project entitled "Removal of non-biodegradable organic charge and micropollutants by applying heterogeneous catalytic ozonation from the effluent of urban wastewater treatment plants", also named "Cat-Ozon", which was completed at the end of 2021, it is evident that the investment is economically viable and investment efficient. This fact has led to the patent application process, with the submission of the relevant file to the Industrial Property Organization. The invention will be titled "A method for the removal of micro-pollutants by the application of heterogeneous catalytic ozonation from water" and the process is ongoing.

This research project was carried out at the wastewater treatment plant in the area of Nea Michaniona (Aineia) by AKTOR S.A. (at the AINEIAS Wastewater Treatment Plant) in collaboration with the Aristotle University of Thessaloniki (Department of Chemistry).

The project's objective was to investigate the development and trial application of an effective and cost-efficient method for removing micropollutants and soluble non-biodegradable residual organic load (DOC) under real conditions from the effluent of an urban wastewater treatment plant.

INNOVATIVE SOLUTIONS AND SERVICES

Since November 2020, Attiki Odos subscribers and all electronic users who use the e-PASS device to pay the tolls can use their device throughout the entire motorway network in Greece, as part of the GRITS (Greek Interoperable Tolling System) service. This has resulted in an increase in the penetration of transponder payment on all motorways in the country, providing speed in toll transactions and avoiding delays, thus improving the level of service provided to users. Specifically, in Attiki Odos, almost 60% of the transits are made with a transponder with the corresponding percentage in MOREAS reaching 45%.

AKTOR FM, for more effective monitoring of maintenance contracts (preventive and intervention works), has proceeded to the installation of a special CMMS software (COSWIN 7i). At the same time, it has installed the POWERFLEET system for monitoring the location, route and speed of the company's vehicles fleet, enabling the monitoring of movement and speed limit violations.

Moreover, AKTOR FM continues its cooperation with a company specializing in electric vehicle charging stations. Through this

collaboration, the Group has proceeded with the installation of 24 new electric vehicle chargers for private customers, thus reaching a total of 32 installations.

It is worth noting that in 2022, AKTOR FM received multiple distinctions as well as the honorary distinction **"Energy Supplier of the Year"** at the **Energy Mastering Awards** ceremony. These distinctions are related to its operating methods regarding environmental protection issues and addressing the impacts of climate change, its good practices for improving its energy efficiency, and its continuous contribution to reducing its environmental footprint.

Digital Transformation

Digital transformation is a key pillar of ELLAKTOR Group's strategy, aiming to provide user-friendly digital services tailored to business needs. Digital transformation seeks to increase productivity by improving the way the organization operates, increasing the quality and speed of information collection. With the use of technology, processes are becoming more efficient and automated, allowing people to focus on more creative and advanced tasks. In 2022, the Group invested €2.5 million in digital transformation.

To achieve this, the Group's IT department applies flexible models for designing and implementing new digital solutions, integrating innovative methods and cutting-edge technologies in various areas.

Digital transformation includes the following areas:

- ▶ Mobile and tablet access to corporate information
- ▶ Cloud technologies for flexibility, reliability, security and reduced operational costs
- ▶ Data analysis and presentation of results for decision-making
- ▶ Internet of Things (IoT) in production
- ▶ Robotics and process automation
- ▶ Artificial Intelligence (AI)
- ▶ Cybersecurity

ELLAKTOR Group aims to fully leverage the opportunities of digital transformation and acquire relevant knowledge and skills at all levels, shaping a work environment familiar with the digital reality and its opportunities.

The Group's strategy for spreading and implementing Digital Transformation within its activities is **"Cloud First"**. By this term, IT prioritizes Cloud technologies for implementing new requirements in the organization, avoiding the equipment purchases and expensive Data Centers implementation.

Particularly for business sectors such as construction, where activity intensity varies depending on the number of projects at any given time, Cloud technology helps in scaling resources as needed, without tying up capital that might be idle for extended periods.

For this purpose, the Group has entered into a strategic partnership with Microsoft and other high-tech solution providers, utilizing services for the implementation of its plans and the transition to the Cloud.

Today, the Group has implemented a number of projects using Microsoft technologies, such as email, user files, SharePoint areas, secure internet access and various applications such as the Group's Portal, the ProjectView application for managing construction sites and factories, etc.

Digital transformation is an ongoing effort of the Group, which strongly involves the concept of change, not so much in terms of technology, but in the way people work. It requires a change in people's mindset to adopt new approaches and ways of thinking about existing processes and situations. Clearly, the main element is not the technology itself but the human factor and how it interacts with the new technology in order to become more efficient, focusing on the essence rather than on trivial and repetitive tasks.

Below are some indicative initiatives:

- ▶ Use of Building Information Modelling (BIM) in architecture and construction, allowing significant benefits throughout the life-cycle of an infrastructure project or building (building life-cycle). BIM is a process used in the construction industry to create a digital model of a building or structure that includes information about the design, construction, maintenance and operation of the building.

BIM creates a unified work environ-

ment for all parties involved in the construction process, such as architects, engineers, contributors, constructors, contractors, as well as the clients themselves. With BIM, developers can create a digital model of the building that includes information about its design, materials, dimensions, equipment and specifications, as well as how the various building components affect the building's performance over its life cycle. BIM can enhance the productivity, quality, safety and performance of construction to a very large extent.

- ▶ The use of cloud computing infrastructure by the Group offers several advantages, including:

Flexibility: The cloud infrastructure allows users to adjust their computing needs and resources accordingly. This flexibility enables businesses to quickly adapt to market changes and their own needs.

Security: The Group's selected cloud providers offer secure data storage and processing services, with continuous updates and enhanced security measures that allow users to store and manage their data securely.

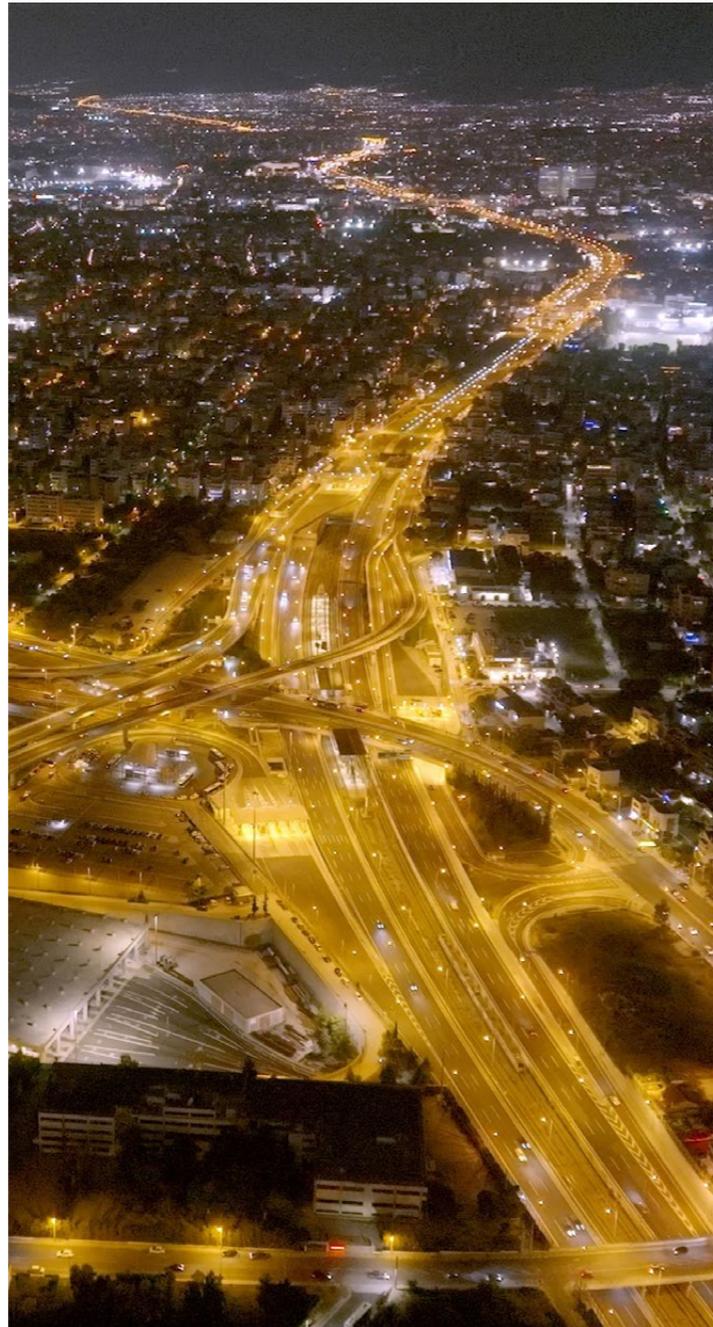
Accessibility: Users can access cloud services from anywhere via an internet connection, enabling employees to work remotely and access services from any device connected to the internet.

Cost efficiency: Due to the scale of operations of cloud service providers, the services they offer tend to be more economical.



The use of modern cloud technologies, such as IAS (Infrastructure as a Service), PaaS (Platform as a Service) and SaaS (Software as a Service), which provide a cost-effective, secure and flexible infrastructure of digital resources (processing and data storage), especially for construction companies that need to scale resources according to the number of projects and employees they have at any given time.

- ▶ The operation of an Alternative Data Center in the Cloud, using Microsoft technologies, allows the organization to continue working seamlessly within a few hours in case of a total destruction of the current Data Center located in the central building.
- ▶ The use of mobile technology services and the availability of data from anywhere, securely, offers flexibility and immediacy in work and decision-making.
- ▶ Data analysis using advanced techniques of primary data analysis provides an accurate and timely picture of the project development, allowing each company to take corrective actions, if necessary.



- ▶ The use of advanced SIEM (Security Information and Event Management) event correlation techniques allows the Group to identify any attempts to steal data or deceive its employees with the aim of stealing data, in order to protect its information. SIEM is a security technology that combines the collection, analysis and response to security data and security-related events in a corporate environment.

SIEM continuously collects security data from various network and system sources as well as user behavior data. These data are analyzed and compared with external data sources and threat scenarios in order to identify anomalies, potential threats and risks. SIEM systems then trigger alarms or automated response procedures, such as notifying security staff, isolating systems or blocking access from unusual IP addresses. SIEM allows companies to understand their security level and identify threats in a timely manner.

- ▶ Improving the backup process with cloud technologies, avoiding the use of tapes and making the way to get these backups instant, more economical, and more reliable.
- ▶ Transition to virtual server technologies

(Virtual Machines) to increase the availability, reliability and security of the infrastructure. The use of virtual machine technology allows for better management of the technology resources required for a service in a more cost-effective way. It also offers scalability, high availability and quick deployment of new machines.

- ▶ Electronic Archiving, Distribution and Documents Search. The archiving system used by ELLAKTOR Group refers to a set of procedures and technological solutions used to manage the files of a company or organization. The goal of archiving is to help the company manage its records and address increasing challenges in areas such as regulatory compliance, security, time and cost savings and enhancing data availability. With the use of this specialized application, documents are securely distributed to individuals who are authorized to access them electronically and are also structured using specific keywords (metadata) to make them easy to find.



- ▶ cPBX (Cloud Private Branch Exchange). A cloud-based call center has been developed to replace all the small call centers in various locations (mainly construction sites), providing telephony to these locations, in a more economical and faster manner, since there is no longer a need for specialized equipment. Additionally, the internal numbers given to their employees follow them even if they change worksites, simplifying management.
- ▶ Employee eLearning platform. The IT department, in cooperation with the Group's Human Resources, have developed a special platform for user training, offering the appropriate training to the required job roles along with the necessary documentation.
- ▶ Operation of an electronic platform for the collection and processing of performance data of the Group's companies in the field of sustainable development (ESG Monitoring Platform).
- ▶ Use of digital signatures on contractual documents for increased flexibility and speed in related processes.
- ▶ Use of cloud services for managing new hires, using a specialized platform.

Based on the needs of the Group and its companies, the implementation of a series of new pro-

jects has started and is in ongoing process:

- ▶ The development of a new human resources management system, aiming to become the Group's single point of reference for personnel and at the same time to implement a series of automated processes related to employees, such as evaluations, leave management, etc.
- ▶ The implementation of an Integrated Materials Management System, from the moment of request to the time of their use in the project, in a uniform and electronic way to ensure the process and speed and to minimize the use of paper. This system provides a reliable basis for the analysis of data regarding the purchases of materials and services, aiming to reduce purchase costs.
- ▶ Automation of invoice entry in digital format and automatic data entry using Artificial Intelligence (AI) technologies that uses Robotic Process Automation (RPA) technology. This innovative technology speeds up the entry of data in structured systems (such as the entry of invoices in SAP) and at the same time reduces human errors.



ANNEX

CONTENTS

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Report Methodology

The purpose of this Sustainable Development Report is to fully and comprehensively capture and inform the stakeholders of ELLAKTOR Group regarding the Group's performance on ESG and sustainable development matters during 2022, as well as its strategy on these areas and the relevant targets that have been set.

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

The 2022 Sustainable Development Report covers the period from 01.01.2022 to 31.12.2022 and it includes the Group's companies based in Greece, Germany, Jordan, Qatar, Cyprus and Romania, in which the Group has a majority shareholding and/or exercises management duties. The companies, whose data are included in the 2022 Sustainable Development Report, represent 97% of the Group's total turnover. The financial results presented refer to the overall operation of the Group, both in Greece and abroad.

Regarding the consolidated data presented in the [Environment](#) chapter, it is clarified that:

- ▶ The figures for the joint ventures of AKTOR and HELECTOR are consolidated and do not correspond to the company's share in these joint ventures.
- ▶ The data for R.E.D.S. company include only the communal areas of Smart Park and not the tenants' areas.

Where a comparison is feasible, any deviations from previous years have been presented and explained in the relevant sections of the Report.

This Sustainable Development Report has been prepared in accordance with the GRI Standards. In addition, the Group has applied the eight key principles of the GRI Standards (Accuracy, Balance, Clarity, Comparability, Completeness, Sustainability context, Timeliness and Verifiability). For the preparation of the Report, the GRI supplement for the Energy Sector (Electric Utilities Sector Supplement) and the Construction and Real Estate Sector Supplement, the 10 Principles of the UN Global Compact, the Athens Stock Exchange Guide for Non-Financial Information (ESG Reporting Guide 2022) and the Sustainability Accounting Standards Board (SASB) guidelines for the Engineering and Construction Services and Waste Management sectors have also been taken into account.

In order to identify the most material issues for the Group's sustainable development, the results of the materiality analysis process conducted in early 2023 were used.

The report was prepared in collaboration with [AIPHORIA Consulting](#).

The Report was subject to external assurance for the third consecutive year (see ["Independent External Assurance Report"](#)).

For any clarifications regarding the Sustainable Development Report for 2022, please contact:

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GRI Content Index

Statement of use	ELLAKTOR Group has reported in accordance with the GRI Standards for the period 1 January 2022 - 31 December 2022.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	N/A

GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)	
General Disclosures				
GRI 2: General Disclosures 2021	The organization and its reporting practices			
	2-1 Organizational details	a. ELLAKTOR S.A. is the parent company of the ELLAKTOR Group b. ELLAKTOR Public Limited Company Engineering, Holding and Services Société Anonyme c. 25 Ermou Str., 145 64 Nea Kifissia, Greece d. P. 9		
	2-2 Entities included in the organization's sustainability reporting	P. 9, 11-15 Annual Financial Report 2022 (P. 68, 257-261, 263-267)		
	2-3 Reporting period, frequency and contact point	a. Reporting period 01/01/2022 - 31/12/2022 Annual reporting frequency b. Financial Reporting Period 01/01/2022 - 31/12/2022 c. August 2023 d. P. 153		
	2-4 Restatements of information	Any restatements (where they exist) are explained by in-text comments and/or footnotes. P. 56		
	2-5 External assurance	P. 188-190		
	Activities and workers			
	2-6 Activities, value chain and other business relationships	P. 11-15, 57, 65, 66, 67, 68, 141-142		
	2-7 Employees	P. 81-82		
	2-8 Workers who are not employees	P. 81		

The gray cells indicate that the "Omissions" column is not applicable



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
General Disclosures			
Governance			
GRI 2: General Disclosures 2021	2-9 Governance structure and composition	Five-year term of office of Board members (27.01.2021 – 27.01.2026) P. 122-125	
	2-10 Nomination and selection of the highest governance body	P. 124 Annual Financial Report for 2022 (P. 122-123)	
	2-11 Chair of the highest governance body	P. 122	
	2-12 Role of the highest governance body in overseeing the management of impacts	P. 21, 125-126	
	2-13 Delegation of responsibility for managing impacts	P. 126	
	2-14 Role of the highest governance body in sustainability reporting	P. 21, 126	
	2-15 Conflict of interests	P. 129	
	2-16 Communication of critical concerns	a. The Group Regulatory Compliance Department keeps a record of the results of the investigations it has carried out in relation to reports/complaints submitted and informs the Vice President of the Board of Directors, through his annual reports and whenever necessary, of all reports/complaints received and managed during the year. b. There were no critical concerns that were recorded through the whistleblowing process.	
	2-17 Collective knowledge of the highest governance body	P. 123	
	2-18 Evaluation of the performance of the highest governance body	P. 123	
	2- 19 Remuneration policies	P. 124, 126 Annual Financial Report for 2022 (P. 122-123)	
	2-20 Process to determine remuneration	P. 124 Annual Financial Report for 2022 (P. 122-123)	
	2-21 Annual total compensation ratio	a. Ratio of annual total compensation= 6.8 Annual total compensation of the CEO (highest paid employee)* (€205,307)/ median of total compensation of all employees** (€30,077) <i>*Total remuneration from ELLAKTOR S.A.</i> <i>**Average gross remuneration of ELLAKTOR S.A. personnel.</i> b. There was no increase in the total remuneration of the CEO (the highest paid employee).	



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
General Disclosures			
GRI 2: General Disclosures 2021	Strategy, policies and practices		
	2-22 Statement on sustainable development strategy	P. 3-5	
	2- 23 Policy commitments	P. 17, 18-19, 49, 88, 96-97, 127-129	
	2-24 Embedding policy commitments	P. 18-19, 36-39, 50-52, 75, 81, 88-90, 95, 98, 100, 104, 119-121, 125-126, 140-142	
	2-25 Processes to remediate negative impacts	P. 18-19, 36-39, 50, 52-53, 54, 56, 58, 64-66, 68-69, 72-73, 75-78, 81, 86, 88-90, 96-98, 100, 104, 106-107, 119, 125, 140-142	
	2-26 Mechanisms for seeking advice and raising concerns	P. 127-129	
	2-27 Compliance with laws and regulations	P. 127-130 There were no significant incidents of non-compliance with laws and regulations that would have resulted in a fine of more than 1‰ of turnover.	
	2-28 Membership associations	P. 40, 174-175	
	Stakeholder engagement		
	2-29 Approach to stakeholder engagement	P. 20, 172-173	
2-30 Collective bargaining agreements	P. 97		
Material topics			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	P. 21-26	
	3-2 List of material topics	P. 22-26	
Energy transition and air emissions management			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 49-53, 54-59, 60-61	
GRI 302: Energy 2016	● 302- 1 Energy consumption within the organization	P. 56-57	
	302- 2 Energy consumption outside of the organization	357,304 MWh	
	302- 3 Energy intensity	P. 56-57	
	302-4 Reduction of energy consumption	P. 56, 58	

● Disclosures that have been reviewed in the context of external independent assurance

The gray cells indicate that the "Omissions" column is not applicable



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
Material topics			
GRI 305: Emissions 2016	● 305-1 Direct (Scope 1) GHG emissions	P. 60	
	● 305-2 Energy indirect (Scope 2) GHG emissions	P. 60-61, Scope 2 location based: 33,671 t CO ₂ eq., market based: 43,734 t CO ₂ eq.	
	305-3 Other indirect (Scope 3) GHG emissions	P. 61	
	305-4 GHG emissions intensity	P. 60	
	305-5 Reduction of GHG emissions	The energy saving actions implemented in 2022 (P. 56) led to the avoidance of 67 t CO ₂ eq.	
	305-6 Emissions of ozone-depleting substances (ODS)	P. 61	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	P. 61, 62	
Circular economy and waste management			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 64-70, 184-185	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	P. 64, 69-70	
	● 306-2 Management of significant waste-related impacts	P. 64, 69-70	
	● 306-3 Waste generated	P. 70, 184-185	
	● 306-4 Waste diverted from disposal	P. 64, 70-71, 184-185	
	● 306-5 Waste directed to disposal	P. 64, 70-71, 184-185	
Climate change			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 33, 49, 54-55, 56-59, 63	
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	P. 33, 49, 63	

● Disclosures that have been reviewed in the context of external independent assurance



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
Material topics			
Employees' and business partners' health, safety and well-being			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 81, 85-86, 88-96, 187	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	P. 88	
	403-2 Hazard identification, risk assessment, and incident investigation	P. 88, 90-91, 92	
	403-3 Occupational health services	P. 89	
	403-4 Worker participation, consultation, and communication on occupational health and safety	P. 88-89, 91	
	● 403-5 Worker training on occupational health and safety	P. 95-96	
	403-6 Promotion of worker health	P. 85-86	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	P. 88, 90	
	403-8 Workers covered by an occupational health and safety management system	For the Group companies where the ISO 45001 system is applied, all employees are covered by this Management System.	
	● 403-9 Work-related injuries	P. 93-94, 187	
	403-10 Work-related ill health	P. 93	
Equitable and inclusive working environment and human rights			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 96-99	
GRI 405: Diversity and Equal Opportunity 2016	● 405-1 Diversity of governance bodies and employees	P. 99	
	405-2 Ratio of basic salary and remuneration of women to men	0.75 P. 99	
GRI 406: Non-discrimination 2016	● 406-1 Incidents of discrimination and corrective actions taken	P. 99	

● Disclosures that have been reviewed in the context of external independent assurance



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
Material topics			
Care for the prosperity of local communities			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 81, 100-106, 141	
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	P. 81	
GRI 204: Procurement Practices 2016	● 204- 1 Proportion of spending on local suppliers	P. 141	
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	P. 106 Stakeholders have been engaged for 100% of the projects subject to environmental permitting.	
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	There have been no such incidents.	
Compliance, integrity and business ethics			
GRI 3: Material Topics 2021	3-3 Management of material topics	P. 127-130	
GRI 205: Anti-corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	P. 87, 130	
	● 205-3 Confirmed incidents of corruption and actions taken	P. 129	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	P. 129	
GRI 415: Public Policy 2016	415-1 Political contributions	In 2022 no donations in cash or in kind were given to political parties.	
GRI 417: Marketing and Labeling 2016	417-3 Incidents of non-compliance concerning marketing communications	In 2022 there were no incidents of non-compliance with regard to marketing communications for Group companies.	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	P. 130	

● Disclosures that have been reviewed in the context of external independent assurance



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
Non-Material Topics			
Business continuity and emergency preparedness			
	Investments to ensure business continuity and emergency preparedness	P. 136-139	
Employment practices, training and development			
GRI 401: Employment 2016	● 401-1 New employee hires and employee turnover	P. 83	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	P. 85-86	
	401-3 Parental leave	P. 97	
GRI 404: Training and Education 2016	● 404-1 Average hours of training per year per employee	Average annual training hours of management = 5.98 Average annual training hours for non-managerial staff = 5.15 P. 87	
	404-2 Programs for upgrading employee skills and transition assistance programs	P. 86-87	
	● 404-3 Percentage of employees receiving regular performance and career development reviews	P. 84	
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	3 weeks	
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	P. 97	

● Disclosures that have been reviewed in the context of external independent assurance



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
Non-Material Topics			
Infrastructure safety and user experience			
GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	In 2022 there were no incidents of non-compliance with regard to the health and safety impacts of products and services.	
Use of natural resources and raw materials			
GRI 301: Materials 2016	301-1 Materials used by weight or volume	5,434,134 t (significant raw materials and products)	
Water and effluents management			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	P. 72-73	
	303-2 Management of water discharge-related impacts	P. 73	
	● 303-3 Water withdrawal	P. 72, 186	
	303-4 Water discharge	151,789 m ³	
	303-5 Water consumption	P. 72	
Promoting sustainability in the supply chain			
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	P. 142 In 2022, 80% (on the basis of turnover) of business partners were evaluated.	
GRI 414: Supplier Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	P. 142 In 2022, 80% (on the basis of turnover) of business partners were evaluated.	

● Disclosures that have been reviewed in the context of external independent assurance



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
Non-Material Topics			
Reinforcement of innovation, research and digital transformation			
	Investments in innovation, research and digital transformation	P. 118, 143-148	
Economic value generation and distribution			
GRI 201: Economic Performance 2016	● 201-1 Direct economic value generated and distributed	P. 16	
	201-4 Financial assistance received from government	€33,476,417	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	P. 107-114	
Biodiversity and ecosystems protection and preservation			
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	P. 75-78	
	304-3 Habitats protected or restored	P. 75-78	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	P. 75	

● Disclosures that have been reviewed in the context of external independent assurance



Athens Exchange ESG Reporting Index

The table below shows the correlation of the contents of the Report with the metrics of the Athens Exchange (ATHEX) Non-Financial Information Reporting Guide.

Non-financial ESG Metrics of ATHEX			
ATHEX* Metric	Metric title	Supplementary information	Page of the Report
Core metrics			
Environmental			
● C-E1	Scope 1 emissions	Intensity of direct greenhouse gas emissions (t CO ₂ eq.)/€ = €0.0000334 Normalization factor: €1,043,544,058	P. 60
● C-E2	Scope 2 emissions	Intensity of indirect greenhouse gas emissions (t CO ₂ eq.)/€ = €0.0000323 Normalization factor: €1,043,544,058	P. 60
● C-E3	Energy consumption and production	Total energy consumption within the organization: 251,044 MWh Percentage of electricity consumed: 40.07% Percentage of energy consumed from renewables: 14.49% Total energy production: 1,364,480 MWh Percentage of energy produced from renewables: 100%	P. 54-56
Social			
C-S1	Stakeholder engagement	-	P. 20, 172-173
● C-S2	Female employees	-	P. 82-83
C-S3	Female employees in management positions	19.90% of the employees in the top 10% of the highest paid workers are women.	P. 82
● C-S4	Employee turnover	-	P. 83
C-S5	Employee training	Average training hours (10% of higher paid employees) = 2.72 Average training hours (90% of lower paid workers) = 5.43	-
C-S6	Human rights policy	-	P. 96-97
● C-S7	Collective bargaining agreements	-	P. 97
C-S8	Supplier assessment	-	P. 119, 142

● Metrics that have been reviewed in the context of external independent assurance



Non-financial ESG Metrics of ATHEX

ATHEX* Metric	Metric title	Supplementary information	Page of the Report
Core metrics			
Governance			
● C-G1	Board composition		P. 122
● C-G2	Sustainability oversight	The ESG Strategy & Sustainable Development Division refers to the Group's Strategy Division, while the overall oversight of Sustainable Development issues is carried out by the Sustainable Development Committee.	P. 126
C-G3	Materiality	-	P. 21-26
● C-G4	Sustainability policy	-	P. 19, 36
C-G5	Business ethics policy	Code of Ethics, Business Partner Code of Conduct	P. 97, 128, 142
C-G6	Data security policy	Information Technology Policy	P. 134
Advanced metrics			
Environmental			
A-E1	Scope 3 emissions	GHG intensity of Scope 3 emissions (t CO ₂ eq.)/€ = 0.00026 Normalization factor: €1,043,544,058	P. 61
A-E2	Climate change risks and opportunities	-	P. 63
A-E3	Waste management	-	P. 64-67, 184-185
A-E4	Effluent discharge	151,789m ³ wastewater	-
A-E5	Biodiversity sensitive areas	-	P. 75-78
Social			
A-S1	Sustainable economic activity	-	P. 41-46, 176-182
A-S2	Employee training expenditure	-	P. 87
A-S3	Gender pay gap	The gender pay gap for the Group is 16.66% in favor of men.	-
A-S4	CEO pay ratio	Annual total remuneration of the CEO = €205,307 CEO pay ratio = 6.8 CEO pay ratio = Annual total compensation of the CEO* (€205,307) /Median total compensation for all employees** (€30,077) Remuneration Report 2022 (P. 8, 16) *Total remuneration from ELLAKTOR S.A. **Indirect gross remuneration of ELLAKTOR staff	-

● Metrics that have been reviewed in the context of external independent assurance



Non-financial ESG Metrics of ATHEX

ATHEX* Metric	Metric title	Supplementary information	Page of the Report
Advanced metrics			
Governance			
A-G1	Business model	-	P. 16-17
A-G2	Business ethics violations	-	P. 129
A-G3	ESG targets	-	P. 36-39
A-G4	Variable pay	Variable pay (%) = 34.4% (€454,476 / €1,319,404) Remuneration Report 2022 , (P. 10, 12)	-
A-G5	External assurance	-	P. 188-190
Sector-specific metrics			
Environmental			
● SS-E4	Water management	-	P. 72, 186
SS-E6	Backlog cancellations	For 2022 there were no backlog cancellations.	-
Social			
● SS-S6	Health and safety performance	Accident frequency rate = 0.71 Accident Frequency Rate = (Number of recordable injuries / Number of hours worked by all employees in calendar year) x 200,000. Accident severity rate = 17.93 Accidents Severity Rate = (Number of work days lost due to work-related accidents / Number of hours worked by all employees in calendar year) x 200,000.	P. 94, 187
SS-S8	Customer satisfaction	-	P. 38, 101
SS-S9	Customer grievance mechanism	-	P. 129

● Metrics that have been reviewed in the context of external independent assurance



UN Global Compact Index

Since 2019, ELLAKTOR Group has declared its commitment to adhere to the ten principles of the United Nations Global Compact and submits an annual report on its adherence to the principles.

Description	Mapping to the 10 principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
G1 – Board/senior management engagement	1st, 7th	P. 3, 21, 126 / GRI 2-12, 2-14, 2-22
G2 - Publicly stated commitment	1st, 7th, 10th	P. 49, 97-98, 128-129 / GRI 2-23
G3 - Code of conduct	1st, 7th, 10th	P. 128 / GRI 2-23
G4 - Individual or group responsible on sustainability matters	1st, 7th, 10th	P. 126 / GRI 2-13
G5 - Formal structure to address sustainability matters	1st, 7th, 10th	P. 126 / GRI 2-9, 2-13
G6 - Risk assessment processes	1st, 7th, 10th	P. 131, 135
G6.1 - Risk assessment process related to suppliers or other business partners	1st, 3rd, 7th, 10th	P. 142
G7 - Due diligence on actual and potential negative impacts on sustainability matters	1st, 7th, 10th	P. 21-26 / GRI 2-12, 2-23-a-ii, 3-1, 3-3-d
G7.1 - Due diligence related to suppliers or other business partners	1st, 3rd, 7th, 10th	P. 142/ GRI 2-23-e, 3-1
G8 - Raising concerns about company conduct	1st, 3rd, 7th, 10th	P. 127, 129 / GRI 2-26
G8.1 - Raised concerns about company conduct (additional information)	1st, 3rd, 7th, 10th	P. 127-129 / GRI 2-26
G10 - Executive pay linked to sustainability performance	1st, 7th, 10th	P. 126 / GRI 2-19
G11 - Board composition	1st, 6th	P. 122-125 / GRI 2-9, 405-1
G12 - Sustainability reporting	1st, 7th, 10th	P. 153, 154, 163, 166, 168, 170, 171
G13 - Information assurance	10th	P. 188-190 / GRI 2-5

Description	Mapping to the 10 principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
HR1 - Material human rights topics	1st, 2nd	P. 22, 25 / GRI 3-2
HR2 - Human Rights Policy commitment	1st, 2nd	P. 97-98, 130 / GRI 2-23-a-iv, 2-23-b, 3-3-c
HR2.1 - Human Rights Policy details	1st, 2nd	P. 97, 130 / GRI 2-23-c, 2-23-d, 2-23-e
HR3 - Stakeholder engagement in relation to human rights	1st, 2nd	P. 20, 172-173 / GRI 3-1-b, 3-3-f
HR4 - Prevention/mitigation risks associated with human rights	1st, 2nd	P. 97, 130 / GRI 2-23, 3-3-d
HR5 - Training for human rights	1st, 2nd	P. 98 / GRI 3-3-d
HR6 - Prevention/mitigation risks progress assessment associated with human	1st, 2nd	P. 37, 97-99 / GRI 3-3-e
HR7 - Remedy to adverse impact associated with human rights	1st, 2nd	P. 98 / GRI 3-3-d-ii
HR8 - Practical actions	1st, 2nd	P. 81 / GRI 3-3-c, 3-3-d
L1 - Labor rights policy commitment	3rd, 4th, 5th, 6th	P. 81, 88, 97-98 / GRI 3-3-c, 403
L1.1 - Labor rights policy (additional information)	3rd, 4th, 5th, 6th	P. 81, 88, 97-98 / GRI 2-23-c, 2-23-d, 2-23-e
L1.2 - Freedom of association and collective bargaining	3rd	P. 97 / GRI 2-30
L2 - Stakeholder engagement in relation to labor rights	3rd, 4th, 5th, 6th	P. 172-173 / GRI 3-1-b, 3-3-f, 403
L3 - Prevention/mitigation risks associated with labor rights	3rd, 4th, 5th, 6th	P. 95-96, 97-98, 141 / GRI 3-3-d, 403
L4 - Training for labor rights	3rd, 4th, 5th, 6th	P. 87, 95, 98 / GRI 3-3-d, 403



Description	Mapping to the 10 principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
L5 - Prevention/mitigation progress assessment for risks associated with labor rights	3rd, 4th, 5th, 6th	P. 94, 99, 187 / GRI 3-3-e, 403
L6 - Collective bargaining agreements	3rd	P. 85, 97
L7 - Women in managerial positions	6th	P. 99
L8 - Ratio of remuneration of women to men	6th	P. 99 / GRI 405-2
L9 - Injury frequency	3rd, 4th, 5th, 6th	P. 94, 187 / GRI 403-9
L10 - Incident rate	3rd, 4th, 5th, 6th	P. 94, 187 / GRI 403-9
L11 - Remedy to adverse impacts associated with labor rights	3rd, 4th, 5th, 6th	P. 87, 95 / GRI 3-3-d-ii, 403
L12 - Practical actions	3rd, 4th, 5th, 6th	P. 81 / GRI 3-3-c, 3-3-d, 403
E1 - Policy commitment on environmental matters	7th, 8th	P. 49 / GRI 3-3-c, 302, 303, 304, 305, 306
E1.1 - Policy commitment on environmental matters (additional information)	7th, 8th	P. 49 / GRI 2-23-c, 2-23-d, 2-23-e
E2 - Stakeholder engagement in relation to environmental topics	7th, 8th	P. 50-51, 172-173 / GRI 3-1-b, 3-3-f, 201-2-a-iv, 302, 303, 304, 305, 306
E3 - Prevention/mitigation risks/ associated with environmental topics	7th, 8th	P. 50-54, 63, 75-78 / GRI 3-1-b, 3-3-f, 201-2-a-iv, 302, 303, 304, 305, 306
E4 - Prevention/mitigation progress assessment for risks associated with environmental topics	7th, 8th	P. 36, 50, 53, 63, 75 / GRI 201-2-a-iv, 302, 303, 304, 305, 306
E4.1 - Goals and targets for environmental topics	7th, 8th	P. 36, 50 / GRI 3-3-e, 201-2-a-iv, 302, 303, 304, 305, 306
E4.2 - Measuring progress against targets	7th, 8th	P. 36, 50 / GRI 3-3-e, 201-2-a-iv, 302, 303, 304, 305, 306
E5 - Remedy for impacts associated with environmental topics	7th, 8th	P. 50, 51-53, 54-55, 57, 60-62, 63, 64-71, 72-73, 74, 75-78 / GRI 3-3-d-ii, 201-2-a-iv, 302, 303, 304, 305, 306
E6 - Greenhouse gas emissions (Scope 1 and 2)	7th, 8th	P. 60 / GRI 305-1, 305-2
E7 - Greenhouse gas emissions (Scope 3)	7th, 8th	P. 61 / GRI 305-3
E7.1 - Scope 3 emissions categories that are included in greenhouse gas emissions calculation (additional information)	7th, 8th	P. 61 / GRI 305-3

Description	Mapping to the 10 principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
E9 - Climate adaptation actions	7th, 8th, 9th	P. 63 / GRI 201-2-a-iv
E10 - Percentage of renewable energy consumption	7th, 8th, 9th	P. 56 / GRI 302-1
E12 - Additional topic-specific questions environmental topics that have been identified as material and are connected with organizations operations and/or value chain	-	P. 22, 24 / GRI 3-2
E13 - Water withdrawal and consumption	7th, 8th, 9th	P. 72, 186 / GRI 303-3, 303-5
E14 - Water intensity	7th, 8th, 9th	P. 72
E15 - Number and area of sites owned, leased, or managed by the company in or adjacent to protected areas and/or key biodiversity areas (KBA).	7th, 8th	P. 75 / GRI 304-1
E17 - Implementing project(s) focused on ecosystem restoration and protection	7th, 8th, 9th	P. 75-78 / GRI 304-3
E18 - Air emissions	7th, 8th	P. 61-62 / GRI 305-7
E19 - Total weight of waste generated	7th, 8th	P. 70, 184 / GRI 306-3
E20 - Percentage of hazardous waste	7th, 8th	P. 64, 70-71, 184-185 / GRI 306-4, 306-5
E22 - Practical actions	7th, 8th, 9th	P. 50 / GRI 3-3-c, 3-3-d, 302, 303, 304, 305, 306
AC1 - Compliance program	10th	P. 128-130 / GRI 3-3-c, 205
AC1.1 - Year of compliance program review	10th	2022
AC2 - Conflicts of Interest Policy	10th	P. 129
AC3 - Training on anti-corruption	10th	P. 87, 130 / GRI 205-2
AC3.1 - Training frequency	10th	Annually
AC4 - Monitor the compliance program	10th	P. 128 / GRI 3-3-e
AC5 - Total number and nature of corruption incidents	10th	P. 129 / GRI 205-3
AC6 - Measures to address suspected incidents of corruption	10th	P. 129-130 / GRI 3-3-d, 205
AC7 - Collective action against corruption	10th	P. 130 / GRI 3-3-d, 205
AC8 - Practical actions	10th	P. 119, 128-130 / GRI 3-3-c, 3-3-d, 205



SASB Index

The table below shows the mapping of the content of the Report to the SASB (Sustainability Accounting Standards Board) metrics.

In the metrics referring to engineering projects, which contain the letters "EN" in their code, the data presented refer to the activity of the companies AKTOR, TOMI and their consortia, which belong to the Construction segment. The metrics referring to waste management units, which contain the letters "WM" in their code, present data of HELECTOR and its subsidiaries, i.e. the Group's Environment segment.

SASB code	Description	Additional information	Page of the Report
Environment			
Environmental impacts of project development			
IF-EN 160a.1	Number of incidents of non-compliance with environmental permits, standards, and regulations	0 incidents of non-compliance recorded	-
Greenhouse gas emissions			
IF-WM 110a.1	(1) Gross global Scope 1 emissions, percentage covered by (2) emission-limiting regulations, and (3) emissions-reporting regulations	(1) 12,415 t CO ₂ eq.	-
IF-WM-110a.2	(1) Total landfill gas generated, (2) percentage flared, (3) percentage used for energy	(1) 1,811,048 MMBtu (2) 0% (3) 100%	-
Fleet fuel management			
IF-WM-110b.1	(1) Fleet fuel consumed, (2) percentage natural gas, (3) percentage renewable	(1) 28,518 MWh (2) 30% (3) 9.7%	-
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) 54.3 (2) 0.275 (3) 4.4	-
IF-WM-120a.2	Number of facilities in or near areas of dense population	None, based on official data by the Hellenic Statistical Authority (ELSTAT) for the population census (2021)	-
Social capital			
Structural integrity & safety			
IF-EN-250a.1	Amount of defect- and safety-related rework costs	€763,523	-
IF-EN-250a.2	Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related incidents	€0	-



SASB code	Description	Additional information	Page of the Report
Human capital			
Workforce health and safety			
IF-EN-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees and (b) contract employees	(1a) 0.77 (1b) 0.66 (2a) 0 (2b) 0.13	-
IF-WM-320a.1	(1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract employees	(1b) 0.91 (1b) 0.69 (2a) 0 (2b) 0 (3a) 0.18	-
IF-WM-320a.3	Number of road accidents and incidents	0	-
Labor practices			
IF-WM-310a.1	Percentage of active workforce covered under collective bargaining agreements	87%	-
IF-WM-310a.2	(1) Number of work stoppages and (2) total days idle	No incidents of business interruption were recorded.	-
Business Model and Innovation			
Recycling & resource recovery			
IF-WM-420a.1	(1) Amount of waste incinerated, (2) percentage of hazardous waste, (3) percentage of waste used for energy recovery		P. 64, 70-71, 184-185
IF-WM-420a.3	Amount of material (1) recycled, (2) composted, and (3) processed as waste-to-energy		P. 64, 70-71, 184-185
IF-WM-420a.4	Amount of electronic waste collected, percentage recovered through recycling	12.4 tonnes of waste electrical and electronic equipment. The Group's activity does not include the collection of electronic equipment waste.	-
Leadership and 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 activities 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	€0	-
IF-EN-510a.3	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behavior in the project bidding processes		P. 128, 129
Activity metrics			
IF-EN-000.A	Number of active projects	135	-
IF-EN-000.B	Number of commissioned projects	45	-
IF-EN-000.C	Total backlog	€2,808,237,049	-



Bloomberg GEI Index

Since 2022, ELLAKTOR is included in Bloomberg's Gender Equality Index (GEI), achieving a score higher than the inclusion threshold. By participating in this initiative, ELLAKTOR is committed to the transparency of data on issues of inclusion and equal opportunities at work, prioritizing the strengthening of gender equality and diversity.

Disclosure	Unit	Total
Leadership & Talent Pipeline		
Percentage of women board members (31.12.2022)	%	27.27
Percent Women of Executive Officers	%	0
CDO Or Equivalent Executive		The Senior Sustainability & Corporate Social Responsibility Expert of the Group is dedicated primarily to diversity and inclusion (D&I) strategy which is publicly available on Group's SD Report
Percentage of female in the company's senior management (2 levels down from the CEO)	%	17.16
Percentage of female in the company's middle/other management	%	19.62
Percentage of entry level positions held by female	%	36.38
Percentage of the company's revenue-producing roles held by women	%	63
Percentage of female in company's IT workforce	%	14.71
Percentage of female in company's Engineering workforce	%	14.96
Percentage of female employees	%	26.93
Percentage of female employees promoted during the fiscal year	%	28.77
Percent Women of Employees that Exited Company	%	18.31
Percent Women of New Hires	%	24.27
Does the company have a targeted recruiting strategy to increase women hires?		Yes, diversity strategy, page 97
Released Action Plan to Increase Women In Leadership		Yes, through the Women Empowerment Program (short term action plan-must be accomplished until 2024), page 80

Disclosure	Unit	Total
Equal Pay & Gender Pay Parity		
Percent Women of Top 10 Percent Compensated Employees	%	20
Conducted Global Equal Pay Audit		Yes
Released Quantitative Gender Pay Gap Metrics		Yes, index A-S3, page 164
Percentage of women in the top pay quartile globally*	%	34.38
Percentage of women in the upper middle pay quartile globally*	%	54.84
Percentage of women in the lower middle pay quartile globally*	%	48.39
Percentage of women in the lower pay quartile globally*	%	56.25
Company's global mean (average) raw gender pay gap	%	18.22
Released Action Plan to Close Gender Pay Gap		Yes, strategy (medium term target), page 37
Inclusive Culture		
Global Minimum Weeks Fully Paid Primary Parental Leave	number	17
Global Minimum Weeks Fully Paid Secondary Parental Leave	number	3
Return From Parental Leave 12 Month Retention Rate	%	95.24
Offers On-Site Lactation Rooms		Yes (excluding worksites)
Provides Fully Paid Time Off for Bereavement		Yes
Offers Flexible Work Location		Yes
Total number of training hours in unconscious bias	number	0
Anti-Sexual Harassment Policies		
Public Sexual Harassment Policy Statement		Yes
Annual Employee Sexual Harassment Training		Yes
Independent Investigator for Sexual Harassment Allegations		Yes
Prohibits Nondisclosure Agreements Unless Requested by Victim		Yes
External Brand		
Evaluates Advertising & Marketing Content for Gender Bias		Yes
UN Women's Empowerment Principals Signatory		Yes
UN Global Compact Signatory		Yes

*These KPIs refer to employees at ELLAKTOR S.A.



AA1000 Accountability Principles (2018)

Principle	Methods	Reference to the Report
Inclusivity	Identification of key stakeholders and discussion to understand key topics of interest	P. 20, 172-173
Materiality	Identifying and prioritizing topics that are important to the organization and its stakeholders	P. 21-26
Responsiveness	Responding to material topics and ensuring transparency on performance	P. 33, 36-39, 49-53, 54-55, 56-59, 60-61, 63, 64-70, 81, 85-86, 88-96, 96-99, 100-106, 127-130, 141, 184-185, 187
Impact	Presentation of direct and indirect impacts of the organization's activities	P. 22-26, 33, 36-39, 49-53, 54-55, 56-59, 60-61, 63, 64-70, 81, 85-86, 88-96, 96-99, 100-106, 127-130, 141, 184-185, 187

ISO 26000:2010

ISO 26000:2010 Article	Description	Comment / Reference to the Report
4. Social Responsibility Principles		
4.2	Accountability	The Group publishes on an annual basis a Sustainable Development Report which presents both the Group's performance on ESG and sustainability matters, as well as the company's strategy and the relevant objectives for the future.
4.3	Transparency	P. 36-39, 50, 100, 119, 153
4.4	Ethical behavior	P. 122, 127-130, 139-140
4.5	Respect for stakeholder interests	P. 20, 172-173
4.6	Respect for the rule of law	P. 127-129
4.7	Respect for international norms of behavior	P. 27-35, 96-97, 127-130
4.8	Respect for human rights	P. 96-99

Greek Sustainability Code - Declaration of Compliance

ELLAKTOR Group complies with all 20 criteria of the Code, which are presented below.

Theme	Reference to the Report
STRATEGY	
1. Strategic Analysis & Action	P. 18-19, 36-39
2. Materiality	P. 21-26
3. Objectives	P. 36-39
4. Management of Value Chain	P. 141-142
PROCESS MANAGEMENT	
5. Responsibility	P. 21, 125-126
6. Rules & Processes	P. 50-53, 88-90, 127-129, 139-140
7. Monitoring	P. 27-35, 36-39, 53-55, 56-57, 60-62, 64, 68, 70-72, 74-75, 78, 80, 82-83, 87, 94, 96, 99-100, 115, 118-119, 123, 141, 143-151, 154
8. Incentive and reward systems for Sustainable Development	P. 27-35, 53-55, 56-57, 60-62, 64, 68, 70-72, 74-75, 78, 80, 82-83, 87, 94, 96, 99-100, 115, 118-119, 123, 126, 141
9. Stakeholder Engagement	P. 20, 172-173
10. Product Responsibility and Innovation	P. 143-148
ENVIRONMENT	
11. Usage of Natural Resources	P. 56-62, 64-78
12. Resource Management	P. 50, 52-53
13. Climate-relevant emissions	P. 50, 54-63
SOCIETY	
14. Employment Rights	P. 81, 172
15. Equal Opportunities	P. 97-99
16. Qualifications	P. 81-86
17. Human Rights in the supply chain	P. 96-97, 142
18. Corporate Citizenship	P. 100-113, 116
19. Initiatives & Political Influence	P. 40, 159, 174-175
20. Corruption prevention and alleviation	P. 39, 127-129, 139-140



Report tables

Communication with Stakeholders

Stakeholders	Communication	Basic needs and expectations	Main response of ELLAKTOR Group
Employees	<ul style="list-style-type: none"> Information via the Group Portal and Internal Announcements. Collaboration with all Group Divisions to communicate key topics such as labor matters, training, employee health and safety, as well as corporate social responsibility actions and Group business news. Implementation of an open-door policy. 	<ul style="list-style-type: none"> Working in a healthy and safe environment. Competitive remuneration. Equal development opportunities. Equal, meritocratic and inclusive working environment. Information on the Group's activities and their development. 	<ul style="list-style-type: none"> Human resources. Attracting and retaining employees. Training and development of Employees. Occupational Health and Safety. Diversity, Equity & Inclusion.
Clients	<ul style="list-style-type: none"> Providing information through stock exchange announcements, business development press releases, financial results presentations, Annual Sustainable Development Reports and the provision of specialized data and information. Through Athens Exchange, the official website and social media of the Group, the media and face-to-face meetings. Continuous communication with the relevant executives of each. project/activity area on issues related to clients' projects. 	<ul style="list-style-type: none"> Constructive cooperation with the Group. Completion of quality works and services in accordance with approved specifications within the agreed timescales. 	<ul style="list-style-type: none"> Policies. Business continuity. Regulatory Compliance System. Quality Management System.
Investment community (shareholders, investors and ESG performance rating agencies)	<ul style="list-style-type: none"> Providing information through stock exchange announcements, business development press releases, financial results presentations, Annual Sustainable Development Reports and the provision of specialized data and information. Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community. Ongoing communication with the Group's Management, the Financial Division, the Investor Relations Division and the ESG Strategy & Sustainable Development Division. 	<ul style="list-style-type: none"> Information on the Group's business developments and its growth path. Update on the Group's ESG performance. Safeguarding the Group's sustainability and applying strict standards and principles of corporate governance. 	<ul style="list-style-type: none"> Materiality Assessment. Participation in rating agencies. Contributing to the creation of Sustainable Cities & Communities.
Financial institutions	<ul style="list-style-type: none"> Information, through stock exchange announcements, press releases on business developments, financial results presentations, Annual Sustainable Development Reports and the provision of specialized data and information. Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the institutions. Ongoing communication with the Group's Management, the Financial Division, the Investor Relations Division and the ESG Strategy & Sustainable Development Division. 	<ul style="list-style-type: none"> Timely information on the Group's financial results and business developments. Safeguarding the sustainability of the Group. Application of strict standards and principles of corporate governance. Integration of ESG criteria in the Group's activities. 	<ul style="list-style-type: none"> Corporate Governance Code and Rules of Operation. Policies. Regulatory Compliance System. Business Continuity.



Stakeholders	Communication	Basic needs and expectations	Main response of ELLAKTOR Group
Local community (Local government, local civil society organizations, local media)	<ul style="list-style-type: none"> ▪ Information through press releases on business developments, Annual Sustainable Development Reports and face-to-face meetings/consultations with representatives of local stakeholders. ▪ Constant communication with the Group's competent executives, the persons in charge of each project/activity segment. 	<ul style="list-style-type: none"> ▪ Development of the region in which the Group operates. ▪ Providing employment opportunities. ▪ Working with suppliers from local communities. ▪ Protection of the environment in the areas of operation. ▪ Social support. 	<ul style="list-style-type: none"> ▪ Economic Value Generation and Distribution. ▪ Contributing to the creation of Sustainable Cities & Communities. ▪ Annual Social Responsibility Action Plan. ▪ Improvement of the Urban and Built Environment. ▪ Environmental Management System and implementation of procedures in projects.
Business partners	<ul style="list-style-type: none"> ▪ Information through stock exchange announcements, press releases on business developments, financial results presentations, Annual Sustainable Development Reports and the provision of specialized data and information. ▪ Through Athens Exchange, the official website and social media of the Group, the media, and by face-to-face meetings. ▪ Constant communication with the site managers and the procurement managers of each project/activity. 	<ul style="list-style-type: none"> ▪ Consistent, profitable and long-term cooperation with the Group in all its business segments. ▪ Safe working environment. 	<ul style="list-style-type: none"> ▪ Sustainable Development Strategy and Key Priorities. ▪ Business Continuity. ▪ Business Partner Code of Conduct. ▪ Provision of training programs.
Business Community	<ul style="list-style-type: none"> ▪ Information through stock exchange announcements, press releases on business developments, Annual Reports on Sustainable Development and participation in events/conferences of the segment of activity. ▪ Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community. ▪ Constant communication with representatives of the Management and competent Group executives (project/activity managers) on issues concerning joint ventures. 	<ul style="list-style-type: none"> ▪ Timely, consistent and transparent information on the Group's developments. 	<ul style="list-style-type: none"> ▪ Sustainable Development Strategy and Key Priorities. ▪ Issuing annual reports.
Government bodies and regulatory authorities	<ul style="list-style-type: none"> ▪ Information through stock exchange announcements, press releases on business developments, financial results presentations, Annual Financial Report, Annual Sustainable Development Reports, data and information disclosures. ▪ Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community. ▪ Ongoing communication with representatives of the Management and relevant Group executives (project/activity area managers) on operational issues, ESG actions and labor rights. 	<ul style="list-style-type: none"> ▪ Responsible and lawful activity of the Group. ▪ Protection of the environment. ▪ Implementation of social actions. ▪ Respect and protection of human rights. ▪ Protecting the health and safety of employees. ▪ Implement strict standards and principles of corporate governance. 	<ul style="list-style-type: none"> ▪ Sustainable Development Strategy and Key Priorities. ▪ Human rights policy. ▪ Environmental Management System. ▪ Annual Social Responsibility Action Plan.
Greater society (Media, Sustainable Development bodies, NGOs, civil society bodies)	<ul style="list-style-type: none"> ▪ Information through stock exchange announcements, press releases on business developments, financial results presentations, Annual Financial Report, Annual Sustainable Development Reports, data and information disclosures. ▪ Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community. ▪ Meetings with representatives of the Management and the Group's Corporate Communications Department, regarding the media, on a case-by-case basis and depending on the needs that arise. ▪ Meetings with the ESG Strategy & Sustainable Development Division, regarding NGOs and civil society bodies as needed. 	<ul style="list-style-type: none"> ▪ Information on the Group's sustainable development activities. ▪ Information on the Group's financial, environmental and social results, business developments and activities. 	<ul style="list-style-type: none"> ▪ Sustainable Development Strategy and Key Priorities. ▪ Materiality Assessment. ▪ Performance in rating agencies. ▪ Issuing annual reports

Memberships in Associations and Networks

HELLENIC FEDERATION OF ENTERPRISES (SEV)



The Hellenic Federation of Enterprises (SEV) represents Greek enterprises and industries advocating for their interests, both at national and European level, through its respective business and industry representative body, BUSINESSEUROPE.

SEV BUSINESS COUNCIL FOR SUSTAINABLE DEVELOPMENT SEVBCSD GREECE

The SEV Business Council for Sustainable Development was created with the aim of becoming a strong and dynamic contributor for businesses that wish to play a leading role in promoting Sustainable Development in the Greek business field. Companies that are part of the Council undertake to actively participate in the organization and to endorse a common Code of Sustainable Development Principles, which they have to implement through continuous improvement and adaptation.

ELLAKTOR Group is one of the founding members of the Council, and the President of the Board of Directors of the Group holds the position of Vice-Chairman of the Board of Directors of the SEV Business Council for Sustainable Development.

HELLENIC NETWORK FOR CORPORATE SOCIAL RESPONSIBILITY - CSR HELLAS



A non-profit network of businesses promoting Corporate Social Responsibility in Greece. Its goal is the promotion of the concept of Corporate Social Responsibility and its visibility in business and social environment. ELLAKTOR Group is a member of CSR Hellas.

UNITED NATIONS GLOBAL COMPACT (UNGC)



The UN Global Compact promotes globally the adoption of 10 universally accepted principles in the areas of human rights, working conditions, the environment and the fight against corruption. AKTOR and ATTIKI ODOS have been signatories to the Global Compact since 2008. In 2019, ELLAKTOR Group committed to adhere to the principles of the Global Compact in the conduct of its business and in its

dealings with stakeholders. ATTIKI ODOS and AKTOR, as subsidiaries of the ELLAKTOR Group, are represented by the Group in the international organization and are now members of the local network (Global Compact Network Hellas).

UNITED NATIONS GLOBAL COMPACT NETWORK GREECE



The Greek Network for the UN Global Compact promotes the initiative of the Global Compact in Greece. It is an independent, self-governing entity that works closely with the UN Global Compact in New York and acts as its point of contact for all its members at country level. ELLAKTOR Group is one of the founding members of the United Nations Global Compact Network Greece. Already from 2019, ATTIKI ODOS has been a member of the association, while AKTOR became a member in 2021.

HELLENIC ASSOCIATION OF TOLL ROAD NETWORK - HELLASTRON



ATTIKI ODOS S.A., ATTIKES DIADROMES S.A. and MOREAS S.A. are members of the Hellenic Association of Toll Road Network - HELLASTRON, in which all modern motorways and toll infrastructures operating in Greece participate, with the aim of promoting professional, scientific, research, social and educational matters related to road transport in Greece. HELLASTRON is a member of the European Association of Operators of Toll Road Infrastructures (ASECAP), which includes the national operators of motorways in Europe. Its purpose is to protect and develop the network of motorways and road infrastructure in Europe by charging users (tolls) as a means of ensuring the financing of their construction, operation and maintenance. HELLASTRON is also a member of IBTTA (International Bridge, Tunnel and Turnpike Association), which is an international organization of motorway operators and concessionaires. HELLASTRON is also a member of the Geneva-based 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 Directors of the Federation of Recycling and Energy Recovery Industries and Enterprises (SEPAN), which was created in order to highlight the advantages of adopting the productive economic model of the circular economy, through actions related to the recycling and energy recovery of waste, aiming to enhance the sustainable development of the country.

PANHELLENIC ASSOCIATION OF ENVIRONMENTAL PROTECTION COMPANIES (PASEPPE)



HELECTOR participates in the "Panhellenic Association of Environmental Protection Companies" (PASEPPE), which aims at the cooperation of companies active in the whole range of environmental protection and waste management. Through the cooperation of its members, issues concerning the institutional framework of waste management and environmental protection and the implementation of national legislation are promoted.

HELLENIC WIND ENERGY ASSOCIATION (HWEA)



ELLAKTOR is a member of the Hellenic Wind Energy Association (ELETAEN). ELETAEN, since its establishment, is a member of the European Wind Energy Association WindEurope and acts as its National Representative in Greece. Its purpose is to promote science and research in the wind energy segment, while at the same time it tries to effectively express the well-intentioned interests of the segment and the market, acting as a space for thought, discussion and ideas with scientific documentation and competence.

In addition, STERILISATION S.A. and APOTEFROTIRAS S.A. companies of HELECTOR are registered in the "Association of Healthcare Waste Management Enterprises" (SEDYA) which concerns the entities of sanitary interest for the implementation of legislation on the management of waste from healthcare establishments.

Moreover, "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." chaired the IRF Geneva Program Centre for the period from May 2019 to May 2022.

Also, "Attiki Diadromes S.A." is a member of major international organizations, such as the USA TRB (Transportation Research Board of the National Academies), ERTICO-ITS Europe, while also collaborates with Greek organizations such as the "Panos Mylonas" Road Safety Institute, the Hellenic Institute of Transportation Engineers, the T.S.I. (Telecommunication Systems Research Institute), ITS Hellas, and others.

Finally, it also participates in the Hellenic Institute of Customer Service, which is chaired by the Director of Tolls, Commercial Management and Telephone Service of Attikes Diadromes S.A.



EU Taxonomy tables

Results of the evaluation of the Group's activities based on EU Taxonomy

Segment	Absolute Turnover 2022	Turnover Ratio 2022	Absolute Operating Expenditure 2022	Operating Expendi- ture Ratio 2022	Absolute Capital Expenditure 2022	Capital Expenditure Ratio 2022
	€ million	%	€ million	%	€ million	%
A. TAXONOMY-ELIGIBLE ACTIVITIES						
A.1 Environmentally sustainable activities (taxonomy-aligned)						
CONSTRUCTION	182.40	19.3%	0.57	7.2%	27.89	63.3%
ENVIRONMENT	30.60	3.2%	0.65	8.2%	4.25	9.6%
Total eligible and aligned activities	213.00	22.6%	1.23	15.4%	32.14	73.0%
A.2 Taxonomy-eligible activities non-environmentally sustainable (non-aligned activities)						
CONSTRUCTION	156.78	16.6%	0.31	3.8%	0.01	0.0%
CONCESSIONS	266.33	28.2%	2.48	31.1%	6.43	14.6%
ENVIRONMENT	2.31	0.2%	0.02	0.3%	0.29	0.7%
OTHER	0.20	0.0%	0.01	0.1%	0.52	1.2%
Total eligible and non-aligned activities	425.63	45.1%	2.82	35.3%	7.25	16.5%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A)	638.63	67.6%	4.05	50.8%	39.39	89.4%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES						
TOTAL NON-ELIGIBLE ACTIVITIES (B)	305.42	32.4%	3.92	49.2%	4.65	10.6%
TOTAL (A+B) - CONTINUING OPERATIONS	944.04	100.0%	7.97	100.0%	44.04	100.0%
RENEWABLE ENERGY SOURCES (Discontinued operations)	99.50	9.5%	10.28	56.3%	1.47	3.2%
Total activities: Continuing & Discontinued operations						
A.1 Total eligible and aligned activities - Total activities	312.50	29.9%	11.51	63.1%	33.62	73.9%
A.2 Total eligible and non-aligned activities - Total activities	425.63	40.8%	2.82	15.4%	7.25	15.9%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A) - TOTAL ACTIVITIES	738.13	70.7%	14.32	78.5%	40.86	89.8%
TOTAL NON-ELIGIBLE ACTIVITIES (B) - TOTAL ACTIVITIES	305.42	29.3%	3.92	21.5%	4.65	10.2%
TOTAL (A+B) - TOTAL ACTIVITIES	1,043.54	100.0%	18.25	100.0%	45.51	100.0%



TURNOVER

Segment / Economic Activities	Absolute Turn-over 2022 € mil.	Turnover Ratio 2022 %	Substantial contribution criteria	DNSH criteria ("Does Not Significantly Harm")										Enabling activity E**	Transitional activity T***
			Climate change mitigation %	Climate change mitigation Y/N*	Climate change adaptation Y/N*	Water and marine resources Y/N*	Circular economy Y/N*	Pollution Y/N*	Biodiversity and ecosystems Y/N*	Minimum safeguards Y/N*	% of turnover aligned 2022 %	% of turnover aligned 2021 %			
A. TAXONOMY-ELIGIBLE ACTIVITIES															
A.1 Environmentally sustainable activities (Taxonomy-aligned)															
CONSTRUCTION															
1.4 Conservation forestry	1.38	0.1%	100%		Y	Y	Y	Y	Y	Y	Y	0%		E	
4.1 Electricity generation using solar photovoltaic technology	10.77	1.1%	100%		Y		Y		Y	Y	Y	2%		E	
5.1 Construction, extension and operation of water collection, treatment and supply systems	18.81	2.0%	100%		Y	Y			Y	Y	Y	3%			
5.3 Construction, extension and operation of wastewater collection and treatment	5.20	0.6%	100%		Y	Y		Y	Y	Y	Y	1%			
6.14 Infrastructure for rail transport	126.54	13.3%	100%		Y	Y	Y	Y	Y	Y	Y	20%			
7.1 Construction of new buildings	12.42	1.3%	100%		Y	Y	Y	Y	Y	Y	Y	2%		E	
7.2 Renovation of existing buildings	4.14	0.4%	100%		Y	Y	Y	Y	Y	Y	Y	1%		E	
7.3 Installation, maintenance and repair of energy efficiency equipment	3.11	0.3%	100%		Y				Y		Y	0%		E	
ENVIRONMENT															
4.3 Electricity generation from wind power	1.70	0.2%	100%		Y				Y	Y	Y	0%			
5.10 Landfill gas capture and utilization	22.81	2.4%	100%		Y			Y	Y	Y	Y	4%			
5.9 Material recovery from non-hazardous waste	6.10	0.6%	100%		Y				Y	Y	Y	1%			
Total eligible and aligned activities	213.00	22.6%													
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)															
CONSTRUCTION															
1.4 Conservation forestry	0.54	0.1%													
4.5 Electricity generation from hydropower	3.04	0.3%													
5.1 Construction, extension and operation of water collection, treatment and supply systems	4.14	0.4%													
5.3 Construction, extension and operation of waste water collection and treatment	6.36	0.7%													
5.4 Renewal of waste water collection and treatment	6.01	0.6%													
6.15 Infrastructure enabling low-carbon road transport and public transport	132.81	14.1%													

*Y/N= YES/NO

**E= Enabling activity

***T= Transitional activity



TURNOVER

Segment / Economic Activities	Absolute Turnover 2022	Turnover Ratio 2022	Substantial contribution criteria	DNSH criteria ("Does Not Significantly Harm")										Enabling activity	Transitional activity
			Climate change mitigation	Climate change mitigation	Climate change adaptation	Water and marine resources	Circular economy	Pollution	Biodiversity and ecosystems	Minimum safeguards	% of turnover aligned 2022	% of turnover aligned 2021	E**		
	€ mil.	%	%	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	Y/N*	%	%		
Segment / Economic Activities															
6.16 Infrastructure enabling low-carbon water transport	0.64	0.1%													
7.1 Construction of new buildings	0.49	0.1%													
7.2 Renovation of existing buildings	1.77	0.2%													
7.3 Installation, maintenance and repair of energy efficiency equipment	0.09	0.0%													
Other categories	0.89	0.1%													
OTHER															
1.4 Conservation forestry	0.20	0.0%													
CONCESSIONS															
6.15 Infrastructure enabling low-carbon road transport and public transport	257.89	27.3%													
Other categories	8.44	0.9%													
ENVIRONMENT															
5.9 Material recovery from non-hazardous waste	2.31	0.2%													
Total eligible and non-aligned activities	425.63	45.1%													
Total eligible activities (A.1 + A.2) (A)	638.62	67.6%													
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES															
Total non-eligible activities (B)	305.42	32.4%													
TOTAL (A+B) - CONTINUING OPERATIONS	944.04	100.0%													
RENEWABLE ENERGY SOURCES - Discontinued activities															
4.3 Electricity generation from wind power	98.68	9.5%	100%		Y			Y		Y	Y				
4.5 Electricity generation from hydropower	0.82	0.1%	100%		Y	Y				Y	Y				
Total activities: Continuing & Discontinued operations															
A.1 Total eligible and aligned activities - Total activities	312.50	29.9%													
A.2 Total eligible and non-aligned activities - Total activities	425.63	40.8%													
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A) - TOTAL ACTIVITIES	738.13	70.7%											71.2%		
TOTAL NON-ELIGIBLE ACTIVITIES (B) - TOTAL ACTIVITIES	305.42	29.3%											28.8%		
TOTAL (A+B) - TOTAL ACTIVITIES	1,043.54	100.0%											100.0%		

*Y/N= YES/NO **E= Enabling activity ***T= Transitional activity



OPERATING EXPENDITURE

Segment / Economic Activities	Absolute Operating Expenditure 2022 € mil.	Percentage of Operating Expenditure 2022 %	Substantial contribution criteria	DNSH criteria ("Does Not Significantly Harm")										Enabling activity E**	Transitional activity T***
			Climate change mitigation %	Climate change mitigation Y/N*	Climate change adaptation Y/N*	Water and marine resources Y/N*	Circular economy Y/N*	Pollution Y/N*	Biodiversity and ecosystems Y/N*	Minimum safeguards Y/N*	% of operating expenditure aligned 2022 %	% of operating expenditure aligned 2021 %			
A. TAXONOMY-ELIGIBLE ACTIVITIES															
A.1 Environmentally sustainable activities (Taxonomy-aligned)															
CONSTRUCTION															
4.1. Electricity generation using solar photovoltaic technology	0.03	0.4%	100%		Y			Y		Y	Y	0.7%		E	
5.1. Construction, extension and operation of water collection, treatment and supply systems	0.34	4.2%	100%			Y	Y			Y	Y	8.3%			
5.3. Construction, extension and operation of wastewater collection and treatment	0.12	1.5%	100%			Y	Y		Y	Y	Y	3.0%			
6.14. Infrastructure for rail transport	0.09	1.1%	100%			Y	Y	Y	Y	Y	Y	2.2%			
ENVIRONMENT															
4.3. Electricity generation from wind power	0.23	2.9%	100%			Y				Y	Y	5.8%			
5.10. Landfill gas capture and utilization	0.35	4.4%	100%			Y			Y	Y	Y	8.7%			
5.9. Material recovery from non-hazardous waste	0.07	0.8%	100%			Y				Y	Y	1.7%			
Total eligible and aligned activities	1.23	15.4%													
A.2 Taxonomy-eligible but not environmentally sustainable activities (not-Taxonomy-aligned activities)															
CONSTRUCTION															
5.4. Renewal of waste water collection and treatment	0.03	0.3%													
6.15. Infrastructure enabling low-carbon road transport and public transport	0.25	3.2%													
6.16. Infrastructure enabling low carbon water transport	0.01	0.1%													
7.6. Installation, maintenance and repair of renewable energy technologies	0.01	0.1%													
OTHER															
1.4 Conservation forestry	0.01	0.1%													
CONCESSIONS															
6.15. Infrastructure enabling low-carbon road transport and public transport	2.45	30.8%													
Other categories	0.02	0.3%													

*Y/N= YES/NO

**E= Enabling activity

***T= Transitional activity



OPERATING EXPENDITURE

Segment / Economic Activities	Absolute Operating Expenditure 2022 € mil.	Percentage of Operating Expenditure 2022 %	Substantial contribution criteria	DNSH criteria ("Does Not Significantly Harm")										Enabling activity E**	Transitional activity T***
			Climate change mitigation %	Climate change mitigation Y/N*	Climate change adaptation Y/N*	Water and marine resources Y/N*	Circular economy Y/N*	Pollution Y/N*	Biodiversity and ecosystems Y/N*	Minimum safeguards Y/N*	% of operating expenditure aligned 2022 %	% of operating expenditure aligned 2021 %			
ENVIRONMENT															
5.9. Material recovery from non-hazardous waste	0.02	0.3%													
Total eligible and non-aligned activities	2.82	35.3%													
Total eligible activities (A.1 + A.2) (A)	4.05	50.8%													
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES															
Total non-eligible activities (B)	3.92	49.2%													
TOTAL (A+B) - CONTINUING OPERATIONS	7.97	100.0%													
RENEWABLE ENERGY SOURCES - Discontinued activities															
4.3. Electricity generation from wind power	10.28	56.3%	100%		Y			Y		Y	Y				
Total activities: Continuing & Discontinued operations															
A1. Total eligible and aligned activities - Total activities	11.51	63.1%													
A2. Total eligible and non-aligned activities - Total activities	2.82	15.4%													
TOTAL TAXONOMY-ELIGIBLE ACTIVITIES (A1 + A2) (A) - TOTAL ACTIVITIES	14.32	78.5%											83.2%		
TOTAL TAXONOMY-NON-ELIGIBLE ACTIVITIES (B) - TOTAL ACTIVITIES	3.92	21.5%											16.8%		
TOTAL (A+B) - TOTAL ACTIVITIES	18.25	100.0%											100.0%		

*Y/N= YES/NO

**E= Enabling activity

***T= Transitional activity



CAPITAL EXPENDITURE

Segment / Economic Activities	Absolute Operating Expenditure 2022 € mil.	Percentage of Operating Expenditure 2022 %	Substantial contribution criteria	DNSH criteria ("Does Not Significantly Harm")										Enabling activity E**	Transitional activity T***
			Climate change mitigation %	Climate change mitigation Y/N*	Climate change adaptation Y/N*	Water and marine resources Y/N*	Circular economy Y/N*	Pollution Y/N*	Biodiversity and ecosystems Y/N*	Minimum safeguards Y/N*	% of capital expenditure aligned 2022 %	% of capital expenditure aligned 2021 %			
A. TAXONOMY-ELIGIBLE ACTIVITIES															
A.1 Environmentally sustainable activities (Taxonomy-aligned)															
CONSTRUCTION															
6.14 Infrastructure for rail transport	27.89	63.3%	100%		Y	Y	Y	Y	Y	Y	Y	71%			
ENVIRONMENT															
5.10 Landfill gas capture and utilization	3.47	7.9%	100%		Y	Y	Y	Y	Y	Y	Y	9%			
5.9 Material recovery from non-hazardous waste	0.78	1.8%	100%		Y					Y	Y	2%			
Total eligible and aligned activities	32.14	73.0%													
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)															
CONSTRUCTION															
6.15 Infrastructure enabling low-carbon road transport and public transport	0.00	0.0%													
6.16 Infrastructure enabling low-carbon water transport	0.01	0.0%													
OTHER															
4.3 Electricity generation from wind power	0.51	1.2%													
Other categories	0.01	0.0%													
CONCESSIONS															
6.15 Infrastructure enabling low-carbon road transport and public transport	4.82	10.9%													
Other categories	1.62	3.7%													
ENVIRONMENT															
5.9 Material recovery from non-hazardous waste	0.29	0.7%													
Total eligible and non-aligned activities	7.25	16.5%													
Total eligible activities (A.1 + A.2) (A)	39.39	89.4%													

*Y/N= YES/NO **E= Enabling activity ***T= Transitional activity



CAPITAL EXPENDITURE

Segment / Economic Activities	Absolute Operating Expenditure 2022 € mil.	Percentage of Operating Expenditure 2022 %	Substantial contribution criteria Climate change mitigation %	DNSH criteria ("Does Not Significantly Harm")										Enabling activity E**	Transitional activity T***
				Climate change mitigation Y/N*	Climate change adaptation Y/N*	Water and marine resources Y/N*	Circular economy Y/N*	Pollution Y/N*	Biodiversity and ecosystems Y/N*	Minimum safeguards Y/N*	% of capital expenditure aligned 2022 %	% of capital expenditure aligned 2021 %			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES															
Total non-eligible activities (B)	4.65	10.6%													
TOTAL (A+B) - CONTINUING OPERATIONS	44.04	100.0%													
RENEWABLE ENERGY SOURCES - Discontinued activities															
4.3 Electricity generation from wind power	1.47	3.2%	100%		Y		Y			Y		Y			
Total activities: Continuing & Discontinued operations															
A.1 Total eligible and aligned activities - Total activities	33.62	73.9%													
A.2 Total eligible and non-aligned activities - Total activities	7.25	15.9%													
TOTAL TAXONOMY-ELIGIBLE (A.1 + A.2) (A) - TOTAL ACTIVITIES	40.86	89.8%											58.3%		
TOTAL TAXONOMY-NON-ELIGIBLE ACTIVITIES (B) - TOTAL ACTIVITIES	4.65	10.2%											41.7%		
TOTAL (A+B) - TOTAL ACTIVITIES	45.51	100.0%											100.0%		

*Y/N= YES/NO

**E= Enabling activity

***T= Transitional activity



Table of RES projects by Group companies in operation in 2022

Municipality	Location	Installed capacity (MW)	Project type	Green Bond / Revenues allocated to the project (€ million)
Alexandroupoli	Magoula Kazakou Diplon	23.00	W/F	√ / 42.3
Alexandroupoli	Magoula Kazakou Diplon - Extension	16.10	W/F	√ / 20.3
Argos - Mykines	Mount Ktenias / Psilo Lithari - Kontodiasela	23.00	W/F	√ / 30.1
Argos - Mykines	Lekana	2.00	P/V	√ / 10.8
Argos - Mykines, Tripoli	Lyrkeio	41.40	W/F	√ / 50.2
Arriane - Alexandroupolis	Orpheus - Eptadendros	28.80	W/F	√ / 24.1
Voio	East Askio Maestro	36.60	W/F	√ / 37.9
Voio	West Askio	40.20	W/F	√ / 40.9
Grevena	Smixiotikos River	4.95	SCHP	
Thermi	Landfill of Tagarades	5.05	Landfill gas	
Thiva	Pefkias	10.35	W/F	√ / 10.1
Karystos	Kalinousiza Karpastoni	1.20	W/F	
Kefalonia	Monolati - Kseroliba	13.60	W/F	
Kefalonia	Monolati - Kseroliba - Extension	6.40	W/F	√ / 8.2
Kefalonia	Mount Agia Dynati	32.20	W/F	√ / 40.98
Kefalonia	Mount Agia Dynati - Extension	2.35	W/F	√ / 3.4
Kos	Krotiri	3.60	W/F	√ / 3.8

Municipality	Location	Installed capacity (MW)	Project type	Green Bond / Revenues allocated to the project (€ million)
Lesvos	Skamniouda - Ypsoma Pachys	4.80	W/F	
Lesvos	Skamniouda - Ypsoma Madera	4.20	W/F	
Monemvasia	Mali Madi Metamorfoseos	7.65	W/F	√ / 12.6
Monemvasia	Kalogerovouni - Poulos	17.10	W/F	√ / 21.3
Monemvasia	Gkropes - Rachi Gkioni	18.90	W/F	√ / 23.7
Patmos	Kokkinos Kavos	1.20	W/F	√ / 1.5
Rhodes	Chalatas	3.00	W/F	√ / 4.0
Troizinia	Asprovouni	20.70	W/F	√ / 29.4
Troizinia	Ornolithi	20.70	W/F	√ / 29.5
Troizinia	Psili Rachi - Lambousa - Spasmeni Plaka	16.10	W/F	√ / 22.5
Troizinia	Vromosykia	11.05	W/F	√ / 15.6
Fyli	Landfill, Fily	24.20	Landfill gas	
Zitsa and Pogonio	Kasidiaris 1 Kranies - Karavamia - Elatos	50.40	W/F	√ / 53.1
Pogonio	Kasidiaris 2 Agriachladia - Pr. Ilias - Petra Chaidos - Diavolorachi - Pr. Ilias	39.60	W/F	√ / 42.6
Lagkada	Mavrorachi landfill	3.52	Landfill gas	
Kozani, Municipality of Kozani	South Field Municipality of Kozani	1.26	Landfill gas	
		535.18		578.88



Table of Group's Non-Hazardous Waste

2022	Management Methods				
	Type of waste	Total quantity (kg)	Recovery (R) *(kg)	Disposal (D)**(kg)	Temporary on-site storage (kg)
	Paper, mixed paper, cardboard	138,852	136,852	2,000	
	Metal scrap	158,205	158,205		
	Glass	260	260		
	Plastics and plastic packaging	14,034	12,957	977	100
	Tyres	4,170	4,170		
	Cables	383	383		
	WEEE (Waste from electrical and electronic equipment)	4,781	4,781		
	Demolitions	553,770	553,770		
	Excavations	4,335,000	4,335,000		
	Mixed packaging	64,040	64,040		
	Wooden packaging	2,450	1,520	30	900
	Mixed non-hazardous waste	165,560	131,900	33,660	
	Municipal waste***	455,115	213,075	242,040	
	Other non-hazardous waste***	21,309	19,055	1,502	752
	Total	5,917,929	5,635,968	280,209	1,752

* **Reuse (on-site):** 4,335,270 kg, **Recycling (on-site):**11,750 kg, **Recycling (off site):** 1,188,060 kg, **Composting:**1,998 kg, **Other recovery method:** 98,890 kg

** **Incineration:** 5,902 kg, **Landfill:** 274,307 kg

*****Indicatively:** animal by-products, end-of-life vehicles (ELVs), Bulky waste, metal drums

Table of Group's Hazardous Waste

2022	Management Methods				
	Type of waste	Total quantity (kg)	Recovery (R) *(kg)	Disposal (D)**(kg)	Temporary on-site storage (kg)
	Used mineral oils	108,502	106,871		1,631
	Lead accumulators	19,062	17,972		1,090
	WEEE *(Waste from electrical and electronic equipment)	21,553	19,113		2,440
	Fluorescent lamps	591	591		
	Small Batteries	860	798		62
	Contaminated packages	7,554	6,223		1,331
	Toners	55	55		
	Contaminated Absorbent materials	12,376	7,895	1,632	2,849
	Oil filters	8,021	7,761		260
	Inorganic chemicals waste	105	105		
	Sludges from paints and varnishes	130	110		20
	Fats and oils	770	770		
	Laboratory chemicals	33	33		
	Waste fuel	3,277	3,277		
	Bottom ash	634,890	619,530		15,360
	Fly ash	517,093	62,660	448,829	5,604
	Other hazardous waste	9,604	9,151	453	
	Total	1,344,476	862,915	450,914	30,647

* **Recycling:** 857,236kg, **Other recovery method:** 5,679 kg.

** **Incineration:** 1,632kg, **Other disposal method:** 449,282kg



Table of non-hazardous waste managed by the Group's companies and subcontractors

2022	Management Methods				
	Type of waste	Total quantity (kg)	Recovery (R) *(kg)	Disposal (D)**(kg)	Temporary on-site storage (kg)
	Paper, mixed paper, cardboard	89,740	88,532	1,208	
	Metal scrap	336,024	335,124		900
	Plastics and plastic packaging, pallet tanks	217,660	178,614	38,060	986
	Tyres	6,854	1,124	4,800	930
	Cables	5,124	4,302		821
	WEEE (Waste from electrical and electronic equipment)	242	242		
	Demolitions	82,306,265	82,157,320	13,620	135,325
	Excavations	2,219,660,166	878,812,096	39,663,000	1,301,185,070
	Mixed packaging	161,062	161,062		
	Wooden packaging	308,433	62,653	245,780	
	Mixed non-hazardous waste	3,281,993	2,433,281	848,712	
	Green waste	1,171,265	1,121,100	50,165	
	Municipal waste***	1,547,057	534,254	1,012,803	
	Other non-hazardous waste***	4,621	965	3,656	
	Total	2,309,096,507	965,890,670	41,881,805	1,301,324,032

* **Reuse (on-site):** 815,871,519 kg, **Reuse (off site):** 127,480 kg, **Recycling (off site):** 147,731,151 kg, **Composting:** 1,000,000 kg, **Other recovery method:** 1,160,520 kg

** **Landfill:** 41,881,805 kg

*** **Indicatively:** Metal packaging waste, Blasting Powder

Table of hazardous waste managed by the Group's companies and subcontractors

2022	Management Methods				
	Type of waste	Total quantity (kg)	Recovery (R) *(kg)	Disposal (D)**(kg)	Temporary on-site storage (kg)
	Used mineral oils	164,838	159,345		5,493
	Lead accumulators	7,203	6,784		419
	WEEE *(Waste from electrical and electronic equipment)	5,697	5,697		
	Fluorescent lamps	2,059	863	1,196	
	Small Batteries	11,222	11,192		30
	Contaminated packages	1,107	749	349	9
	Toners	449	405	5	39
	Contaminated absorbent materials	8,267	8,259		8
	Oil filters	1,931	891		1,040
	Inorganic chemicals waste	40,998		40,998	
	Sludges from paints and varnishes	169	169		
	Fats and oils	11,795	1,215	10,580	
	Medical waste	279		279	
	Laboratory chemicals	451		385	66
	Waste fuel	76,640	72,150	4,490	
	Other hazardous waste	27,539	16,320	11,099	120
	Total	360,642	284,038	69,381	7,224

* **Recycling:** 256,809.90kg, **Other recovery method:** 27,228 kg

** **Incineration:** 11,111 kg, **Incineration with energy recovery:** 4,839 kg, **Other disposal method:** 53,430.84 kg



Water withdrawal

Water withdrawal source m ³	Fresh water (≤1.000 mg/L TDS)	Other (>1.000 mg/L TDS)
Surface water	1,948	21,000
Groundwater	809,078	128,738.6
Third-party water (Public or private water supply networks)	264,870.8	
Wastewater from on-site sources	219	
Rainwater	10	
Other sources (Water Treatment Plants, Desalination Plants)	42,861.8	18,175
Total	1,118,987	167,914



Health and Safety Performance

WORK-RELATED INJURIES (GRI 403-9)									
Health and Safety Performance Indexes	2020			2021			2022		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
EMPLOYEES									
Number of fatalities as a result of work-related injury ¹	2	0	2	3	0	3	0	0	0
Rate of fatalities as a result of work-related injury	0.02	0	0.02	0.2	0	0.2	0	0	0
Number of high-consequence work-related injuries	3	0	3	2	0	2	1	0	1
Rate of high-consequence work-related injuries	0.19	0	0.19	0.13	0	0.13	0.08	0	0.06
Number of recordable injuries ²	59	10	69 ³	49	6	55 ⁴	52	9	61 ⁵
Rate of recordable injuries	2.64	2.28	2.56	3.87	0.83	3.15	3.92	2.24	3.53
Total number of hours worked	12,513,046	3,507,274	16,020,320	11,638,068	3,618,130	15,256,198	13,266,561	4,021,290	17,287,851
WORKERS WHO ARE NOT EMPLOYEES									
Number of fatalities as a result of work-related injury							1	0	1
Rate of fatalities as a result of work-related injury							0.47	0	0.40
Number of serious injuries							0	0	0
Serious injury rate							0	0	0
Number of recordable injuries							6	0	6
Rate of recordable injuries							2.81	0	2.43
Total number of hours worked							2,137,342	336,212	2,473,554

*The rate shows the number of accidents per 1 million working hours.

¹ Excludes incidents caused by pathological causes and road accidents that occurred while traveling to/from work.

² Injury is defined as any occurrence at work that results in an employee being injured, as well as loss of working days (beyond the day of the occurrence).

³ Accidents in 2020 include 24 accidents with zero days of absence from work.

⁴ Accidents in 2021 do not include fatalities, incidents due to pathological causes, and accidents with zero days of absence from work.

⁵ Accidents in 2022 do not include fatalities, incidents due to pathological causes, accidents with zero days of absence from work, and accidents occurring while traveling to/from work.

Independent External Assurance Report



TO: MANAGEMENT OF ELLAKTOR S.A.

1. Scope of the External Assurance project of the Sustainability Report

ELLAKTOR SA company (hereinafter referred to as **ELLAKTOR**) has assigned **TÜV HELLAS (TÜV NORD) SA** (hereinafter referred to as **TÜV HELLAS**) the limited external assurance of the Sustainable Development Report, which covers the period of 1/1/2022-31/12/2022.

ELLAKTOR, parent company of the **ELLAKTOR Group**, is headquartered in Greece, at 25 Ermou str, 14564, at Kifissia, Attica.

The Sustainability Report contains data of ELLAKTOR Group's companies headquartered in Greece, Germany, Jordan, Qatar, Cyprus, and Romania, in which the Group holds the share majority and/or the management.

The scope of the project consists of the following:

A. The external assurance of the information disclosed to confirm that the Sustainability Report of **ELLAKTOR** for 2022 has been prepared **"In Accordance"** with the **GRI Universal Standards 2021**.

B. The provision of external assurance service about the accuracy of the claims mentioned for specific numerical indicators that **ELLAKTOR** reported at the Sustainability Report Chapters, based on the **GRI Topic Standards**, as follows: GRI 201-1, GRI 204-1, GRI 205-3, GRI 302-1, GRI 303-3, GRI 305-1, GRI 305-2, GRI 306-2, GRI 306-3, GRI 306-4, GRI 306-5, GRI 401-1, GRI 403-5, GRI 403-9, GRI 404-1, GRI 404-3, GRI 405-1, GRI 406-1.

C. The control of the accuracy of the claims regarding the coverage of specific core, advanced and sector-specific metrics of the **ESG 2022 Reporting Guide of the ATHEX** (Athens Exchange), as follows: C-E1, C-E2, C-E3, C-G1, C-G2, C-G4, C-S2, C-S4, C-S7, SS-E4, SS-S6.

D. The control of the adherence to the AA1000 Accountability Principles (Inclusivity, Materiality, Responsiveness & Impact) against the criteria found in **AA1000AP (2018)**.

The limited external assurance as it is defined by the above project scope, refers to the Sustainability Report of **ELLAKTOR** for 2022 and it was conducted based on the corresponding correlation table of **GRI Standards** Indicators stated by **ELLAKTOR**, to confirm that the Sustainability Report has been prepared **"In Accordance"** with the **GRI Universal Standards 2021**, as well as the requirements of **AA1000AP (2018)**.

2. Project Criteria

The external assurance was based on the evaluation of conformity with the requirements of the following guiding standards:

- A. GRI Universal Standards 2021**
- B. GRI Topic Standards**
- C. AA1000AP (2018)**

For the evaluation of conformity to the requirements of **AA1000AP (2018)**, the provisions of the guide AA1000 Assurance Standard (**AA1000AS v3**) were followed. More specifically, the Type 2-Moderate level of external assurance was followed. According to this, the level of conformity to the Accountability Principles, as they are stated within **AA1000AP (2018)**, was checked, while the reliability and quality of sustainability performance information based on basic sampling of limited range, was simultaneously assured.

3. Project methodology

Based on the conformance criteria of paragraph 2 and to draw conclusions, the external assurance team of **TÜV HELLAS** conducted the following (indicative and not restrictive) methodology:

- ▶ Reviewed the coverage of the **"In Accordance"** with the GRI Universal Standards 2021 requirements, as they are described within the **GRI 1: Foundation 2021, GRI 2: General Disclosures 2021, GRI 3: Material Topics 2021**.
- ▶ Reviewed the procedures followed by **ELLAKTOR** to identify and determine the material issues to include them within the Sustainability Report.
- ▶ Interviews were conducted with selected executives of **ELLAKTOR** having operational role in Sustainability issues to understand the current state of sustainability development activities and progress achieved during the period under reference.
- ▶ Reviewed the **ELLAKTOR** consultation approach with their stakeholders

through interviews with executives responsible for communication with the interested parties at company level and review of selected documents.

- ▶ Reviewed the claims mentioned to the Reporting Indicators, based on the **GRI Topic Standards** and the **ESG 2022 Reporting Guide of the ATHEX** (referred in paragraph 1, point B & C) in connection with the findings of the above steps. In addition, the methodologies, and practices for extracting the results were reviewed and cross-checks were performed on the reliability and quality of the indicators reported in the report. These checks consist (not restrictively) of the following:
 - Understanding of the quality management and results collection processes related to the indicators under consideration.
 - Review of the design of processes, systems, and controls for managing reliability and quality of specified information.

- Sampling of management practices and operation control, as well as evidence gathering to sufficiently ensure the completeness and accuracy of the claims.
- Maintain of the appropriate documentation for all the aforementioned controls.

4. Review limitations

The range of the review was exclusively limited to the activities of **ELLAKTOR Group** companies in Greece, Germany, Jordan, Qatar, Cyprus, and Romania. No visits and interviews in stakeholders of the **ELLAKTOR** have been conducted.

In case of any discrepancy in the translation between Greek and English version of the Sustainability Report, the Greek version shall prevail.

5. Responsibilities of the Reporting Organization and Assurance Provider

The ESG Strategy & Sustainability Division of **ELLAKTOR** carried out the Sustainability Report, thus, is exclusively responsible for the information and statements contained therein.

The external assurance conducted, as it is defined in the project scope (paragraph 1), does not represent **TÜV HELLAS'** opinion related to the quality of the Sustainability Report and its contents.

The responsibility of **TÜV HELLAS** is to express the independent conclusions on the issues as defined in the project scope and in accordance with the relevant contract. The project was conducted in such a way so that **TÜV HELLAS** can quote to **ELLAKTOR** administration the issues mentioned in this report and for no other purpose.

6. Conclusions

Based on the project scope (paragraph 1) and in the context of the external assurance procedure followed by **TÜV HELLAS**, the conclusions are as follows:

A. External assurance of the information disclosed to confirm that the Sustainability Report of ELLAKTOR for 2022 has been prepared "In Accordance" with the GRI Universal Standards 2021.

- ▶ During the external assurance project carried out, nothing has come to the attention of **TÜV HELLAS**, which would lead to the conclusion that the Report has not been prepared "In

Accordance" with the requirements of the **GRI Universal Standards 2021**, as reflected on the corresponding correlation GRI content index.

B. Control of accuracy of the claims mentioned for the Reporting Indicators that ELLAKTOR reported at the Sustainability Report Chapters, based on the GRI Topic Standards

- ▶ Nothing has come to the attention of **TÜV HELLAS** that would lead to the conclusion of the incorrect gathering or transferring of data concerning the claims mentioned to the disclosures (indicators) of the GRI Topic Standards, referred in paragraph 1, point B of this report.

C. Control of accuracy of the claims mentioned for the Reporting Indicators that ELLAKTOR reported at the Sustainability Report Chapters, based on the ESG 2022 Reporting Guide of the ATHEX

- ▶ Nothing has come to the attention of **TÜV HELLAS** that would lead to the

conclusion of the incorrect gathering or transferring of data concerning the claims mentioned to the disclosures (indicators) of the ESG 2022 Reporting Guide of the ATHEX, referred in paragraph 1, point C of this report.

D. Adherence to the AA1000 Accountability Principles (Inclusivity, Materiality, Responsiveness & Impact) against the criteria found in AA1000AP (2018)

Inclusivity: Dialogue on Sustainability Issues with the Stakeholders

- ▶ We have not realized any matter that causes us to believe that major stakeholder groups were excluded from consultation processes, or that **ELLAKTOR** has not implemented the principle of Inclusivity in developing its approach to sustainability.

Materiality: Focus on the material issues related to sustainability

- ▶ We have not realized any matter that causes us to believe that the material issues' definition approach which was followed by **ELLAKTOR** does not provide a comprehensive and balanced

understanding of the material issues.

Responsiveness: Addressing the needs and expectations of stakeholders

- ▶ We have not realized any issue, which would lead us to believe that **ELLAKTOR** has not responded timely and adequately, through decisions and actions, to the needs and expectations that emerged from the material issues of sustainable development.

Impact: Impact of company's activities to the broader ecosystems

- ▶ We have not realized any issue, which would lead us to believe that the **ELLAKTOR** has not understood and managed the direct and indirect impacts that the material aspects create to the broader ecosystems.

TÜV HELLAS did not realize anything that would lead to the conclusion of incorrect collection or transfer of data (qualitative & quantitative) concerning the allegations made regarding the fulfillment of the requirements of the Accountability Principles, as set out in **AA1000AP (2018)**. Additionally, **TÜV HELLAS** did not realize anything that would call into question the reliability and quality of the performance indicators related to the Accountability Principles.

7. Impartiality and independence of the external assurance team

TÜV HELLAS states its impartiality and independence in relation to the project of **ELLAKTOR's** Sustainability Report external assurance. **TÜV HELLAS** has not undertaken work with **ELLAKTOR** and does not have any cooperation with the interested parties that could compromise the independence or impartiality of the findings, conclusions, or recommendations.

TÜV HELLAS was not involved in the preparation of the text and data presented in the Sustainability Report of **ELLAKTOR**.

Athens, July 26, 2023

For **TÜV HELLAS (TÜV NORD)**

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