

SUSTAINABLE  
DEVELOPMENT  
REPORT

A large, stylized graphic of the year "2023" in a light red color, positioned diagonally across the right side of the cover. The background of the entire cover is a dark blue-grey color. On the right side, there is a large, red, semi-transparent graphic of a building's structural frame, including a prominent diagonal beam and a series of vertical and horizontal supports, creating a modern architectural look.

20  
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## Message from the Management



George Mylonogiannis  
President of the Board of Directors



Efthymios Bouloutas  
CEO

The year 2023 marked a period with visible and encouraging signs of recovery in the domestic economy and the normalization of conditions in international markets, despite the ongoing geopolitical crises in Ukraine and the Middle East and their consequences.

The year was primarily characterized by the upgrade of the country's credit rating and its return to investment grade after 13 years, signaling the restoration of international market confidence and highlighting the positive prospects for the Greek economy. Alongside this, political stability and fiscal initiatives, among other factors, served as key defenses against the pressures of the ongoing crises of recent years. At the same time, these efforts supported the resilience of the economy, increased disposable income and wages, reduced unemployment, mitigated social inequalities, and addressed the economic

impacts of the energy crisis and natural disasters resulting from the climate crisis.

All of the above contributed to the creation of a healthier business and investment environment for the country, a critical factor for its further development. Within this context, the Greek economy continued to grow at a steady pace, even in the early months of 2024, outpacing the growth rate of the rest of Europe. This progress is also attributed to the gradual easing of inflation on a global scale, primarily due to falling energy prices.

In this direction, the tourism sector also traditionally played a pivotal role. Freed in 2023 from the lingering effects of the health crisis, it fully recovered, achieving significant growth in all tourism metrics compared to previous years. Additionally, the stabilization of the banking sector, along with the broader development strategy through the «Greece 2.0» plan—funded by the European Recovery and Resilience Facility and currently in full swing—constitutes a vital factor in the country's growth.

For the ELLAKTOR Group, 2023 was a pivotal year, as it successfully completed its operational restructuring and a series of strategic initiatives that ensured its self-financed growth, despite the unique market conditions and challenges. These efforts led to the highest profitability in the past 10 years, with a 46.2% increase in EBITDA, making it possible once again to reward shareholders through capital returns after many years. Contributing to this achievement were the sale transactions of the construction company AKTOR S.A. to INTRAKAT S.A. and the SMART PARK shopping center, owned by

the subsidiary REDS, to TRADE ESTATES, which boosted the Group's liquidity by €210 million.

The above sales were accompanied by careful investment initiatives. At the beginning of the year, the Group, through its subsidiary REDS, signed a contract to acquire a 300-acre plot in Gournes, Heraklion. The aim is to develop a new commercial and tourism hub for the country, delivering multiple benefits to the local community and economy.

To solidify these actions and reaffirm its commitment to integrating sustainable strategies and practices at the core of its operations, the Group remained part of the Financial Times Stock Exchange4Good (FTSE4Good) Index Series for another year. It achieved a 95% score on the "ESG Transparency Score" index of the Athens Stock Exchange (ATHEX), and in May 2023, ELLAKTOR was included in the MSCI Greece Small Cap Index.

For yet another year, Sustainable Development remained a cornerstone of the Group's growth model, playing a leading role in the operational planning of its activities, including in 2023. Guided by best international practices and standards, the Group further strengthened the integration of Environmental, Social, and Governance (ESG) criteria into its business operations and strategy, combining financial and ESG performance to achieve even stronger growth.

## E

The Group activities' footprint in the **ENVIRONMENT** in 2023 reflects its commitment to achieving climate neutrality and the green transition. The most significant actions include:

- Continuation of developing the Roadmap towards net-zero greenhouse gas emissions by 2050.
- Completion of the identification and assessment of climate risks and their potential financial impacts, aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD).
- Submission of a report for the first time to the independent certification organization (CDP) on climate change, achieving a high score of B.
- First-time commitment to setting short-term, scientifically validated emission reduction targets in alignment with the Science Based Targets initiative (SBTi).
- Design and certification of Environmental and Energy Management Systems (ISO 14001 & 50001) for the Development Project of the New Alimos Marina.

Additionally, the Group recorded 223 GWh of energy production from renewable energy sources (RES) and prevented 976 thousand tons of CO<sub>2</sub> equivalent emissions from third parties. It also achieved a 27% reduction in Scope 1 & 2 emissions compared to 2021. Furthermore, the Group managed 816 thousand tons of solid waste and 623 thousand m<sup>3</sup> of wastewater from third parties at its processing facilities, while diverting 97% of waste from disposal methods through its operations.

Focusing on fostering an environmentally and energy-responsible corporate culture, it is noteworthy that in 2023, a total of 3,617 hours of training on environmental and energy topics were conducted, involving the participation of 1,026 employees.

S

A key objective and strategic priority of the ELLAKTOR Group is to operate responsibly in relation to the **SOCIETY** in which it is active. The Group contributes to social well-being through its business activities and social initiatives, responding consistently, responsibly, and transparently to the needs and expectations of local and broader communities. At the same time, it operates with environmental responsibility, delivering high-quality infrastructure projects aimed at improving people’s quality of life and promoting sustainability.

In 2023, the ELLAKTOR Group strengthened its Corporate Social Responsibility (CSR) initiatives, aiming to make a meaningful contribution and provide support to both the local communities where it operates and the broader society. This included infrastructure improvement projects and support for vulnerable groups, in collaboration with relevant authorities and non-profit organizations. Additionally, the Group placed an even greater focus on initiatives and actions to promote the well-being and development of its workforce while ensuring a healthy, safe, and inclusive work environment free from discrimination.

More specifically, in 2023, the Group:

- Designed and launched an action plan to effectively inform and train employees on sustainable development topics.
- Signed the Diversity Charter for Greek Enterprises in May 2023, on the occasion of European Diversity Month.
- Conducted the in-house seminar «ISO 30415 DIVERSITY & INCLUSION,» aimed at achieving independent and external validation of the organizational approaches implemented by the Group to integrate Diversity and Inclusion into the workplace environment.
- Launched the new communication identity for its CSR program, titled «WHOLE LIVING», which served as the main vehicle for implementing all corporate social responsibility initiatives of the Group and its subsidiaries. This program was structured around four key pillars: «living

green,» «living smart,» «living well,» and «living together.» It also boosted the implementation of volunteer initiatives in collaboration with recognized non-profit organizations, further increasing employee engagement.

- Remained committed to maintaining a workplace free from inequalities and exclusions, with women accounting for 49% of the workforce at ELLAKTOR S.A..
- Continued to support the local economy and society, with 95% of the Group’s employees and 83% of its executives coming from local communities in 2023.
- Increased volunteering hours by 87% compared to 2022.
- Increased the average training hours per employee by 33% compared to 2022.
- Conducted the first two open initiatives with the local community, focusing on social awareness, with the participation of approximately 1,800 individuals.
- Maintained a record of zero confirmed incidents of human rights violations or discrimination for another year.

G

In 2023, in the area of GOVERNANCE, the Group continued to strengthen initiatives and actions related to transparency and regulatory compliance while consistently investing in innovation and digital transformation.

Within this framework, the Group continued to report zero confirmed incidents of bribery, corruption, and conflicts of interest, demonstrating the completeness, adequacy, and effectiveness of its Management Systems for Organizational Governance, Regulatory Compliance, Anti-Bribery, and Whistleblowing Management that it implements and operates.

Specifically, for 2023, the Group:

- Successfully completed the evaluation of the adequacy and effectiveness of its Corporate Governance System.
- Conducted a risk assessment of business partners based on ESG criteria.
- Obtained certification for its Business Continuity Management System in accordance with the requirements of ISO 22301:2019.
- Participated in 8 research programs, including the new project «Wood2Wood» (W2W), aimed at transitioning towards a circular economy.
- Acquired a new ESG-based evaluation program for business partners via a platform in collaboration with an external partner.
- Enhanced training initiatives on GDPR and Whistleblowing.
- Invested €1.6 million in digital transformation initiatives.

Since 2021, the Group has been evolving, modernizing, and transforming into a healthy and agile operational entity, well-equipped to respond to and contribute to the pressing needs of today’s world. Its aim is to safeguard and promote a sustainable future for humanity and our planet.

Closing 2023 on a positive note, we continue into 2024,

steadfast in our values, transforming challenges into opportunities, addressing societal needs with impactful actions, and protecting the environment with consistency and responsibility. We remain committed to improving our footprint and contributing meaningfully to the concept of green growth, staying true to our journey toward a safe and sustainable future.

George Mylonogiannis  
**President of the Board of Directors**



Efthymios Bouloutas  
**CEO**



*The report has been prepared in accordance with the guidelines of the Global Reporting Initiative (GRI), the Non-Financial Information Disclosure Guide of the Athens Stock Exchange, the principles of the UN Global Compact, and the guidelines of the Sustainability Accounting Standards Board (SASB). It has also been reviewed by an external body to ensure the accuracy and reliability of its content.*



At a Glance 2023

ELLAKTOR Group

Environment



Climate Change & Circular Economy

Society



Employee Health, Safety & Development



Social Responsibility

Governannce



Integrity and Business Ethics



Innovation & Digital Transformation

€805.5\*

million Net sales

46.2%\*

EBITDA growth

95%

“ESG transparency score”-  
ATHEX ESG

\* Continuing and discontinued operations

223 GWh

of energy production from RES

976 th. tonnes

avoidance of third-party CO<sub>2</sub> eq. emissions

97%\*

diverted from disposal (D)

score B

from the independent certification organization CDP

\* from the operation of the Group

33%

increase in the average training hours per employee compared to 2022

49%

women employees at ELLAKTOR S.A.

€933 th.

invested in initiatives to promote Health and Safety

95% & 83%

employees executives  
from the local community

87%

increase in volunteering hours compared to 2022

92%

of the Group’s companies’ procurement came from local suppliers

0

confirmed incidents of corruption, bribery, and conflicts of interest

Participation in

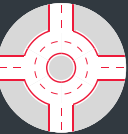
8

research projects

€1,6 mil.

investments in digital transformation

Key Segments



CONCESSIONS



ENVIRONMENT



REAL ESTATE  
DEVELOPMENT & SERVICES



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Disclosures according to EU Taxonomy

Alignment with the  
Sustainable  
Development Goals




Alignment with the  
Principles of the  
United Nations Global Compact










MAIN ACHIEVEMENTS

 Achievement of a high score in the ATHEX 'ESG transparency score' index with 95%

 Remained in the FTSE4Good sustainability index

 ELLAKTOR was added to the MSCI Greece Small Cap index

 Evaluation of technical criteria according to the EU Taxonomy for all 6 environmental indicators

MATERIAL TOPICS

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

OUR PERFORMANCE

**€805.5\***  
million net sales

**46.2%\***  
EBITDA growth

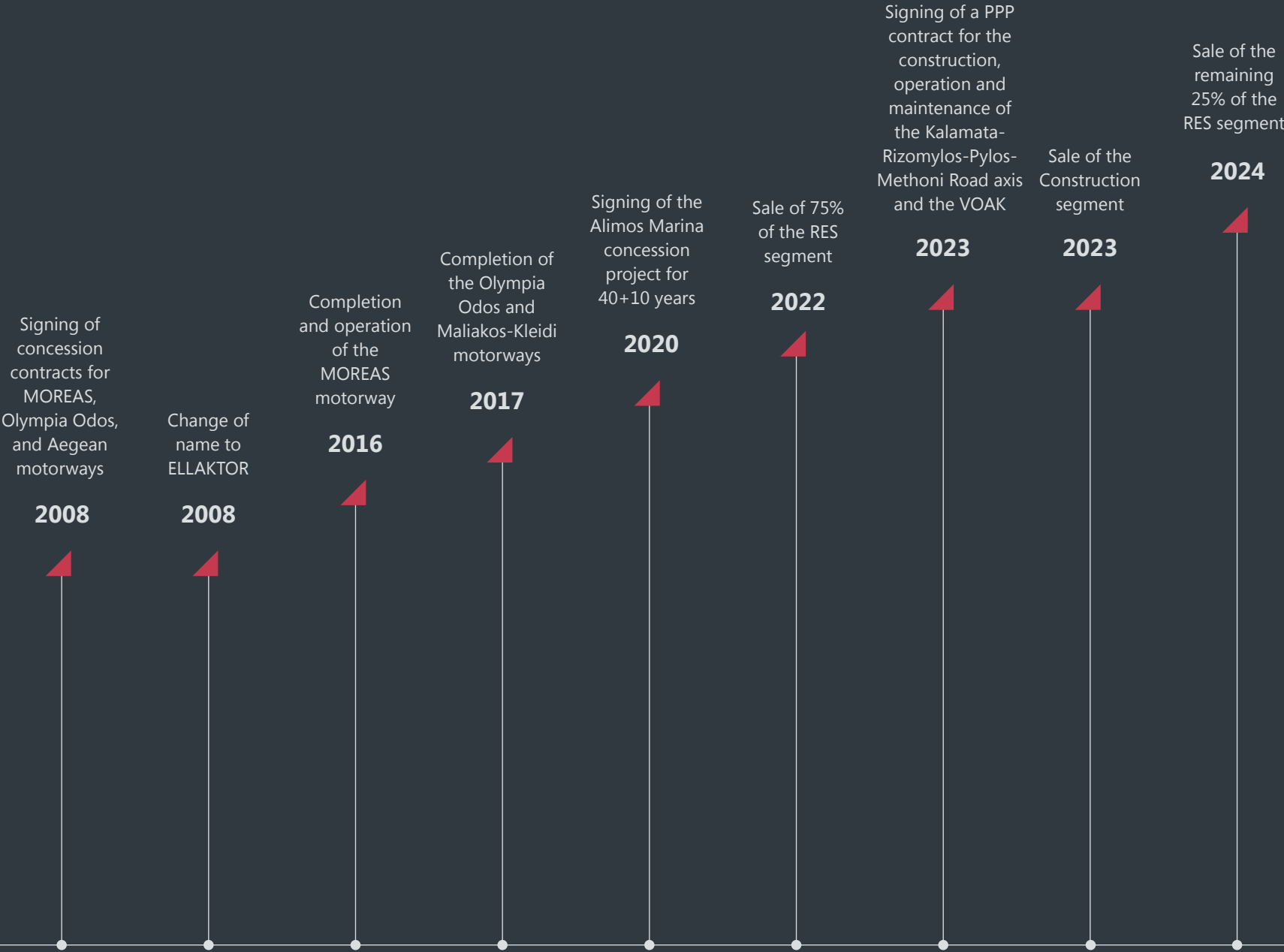
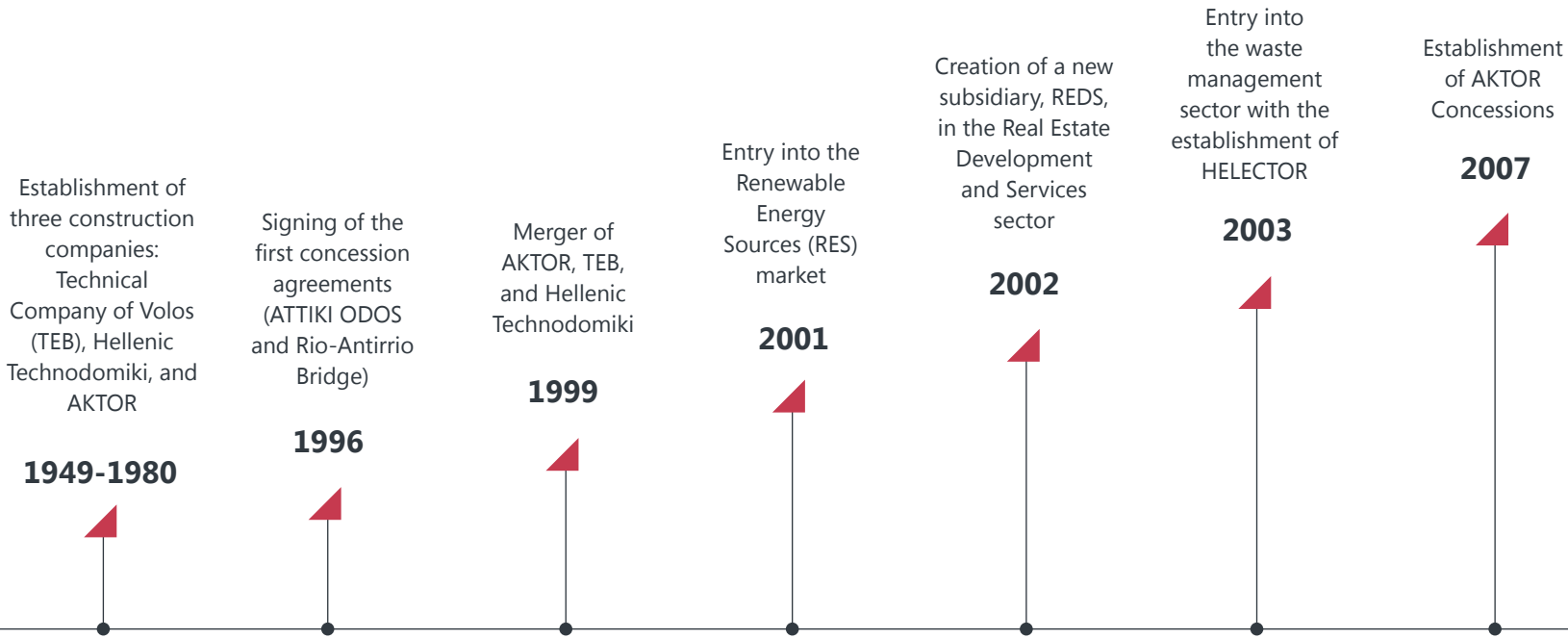
**9.5%**  
increase in traffic on ATTIKI ODOS and 9.2% on other motorways compared to 2022

*\*continuing and discontinued operations*

# Presentation of the Group

ELLAKTOR Group is one of the most significant infrastructure groups in Greece, with a presence in four countries and a diversified portfolio of activities focused on Concessions, Environment and Real Estate Development & Services sectors. Driven by its vision to pave the way for a modern, innovative, safe, and sustainable future and founded on its corporate values, it strives daily by leveraging the unique expertise of its human resources to deliver high-quality Infrastructure, Energy, and Environmental projects, creating value for all its stakeholders and the Greek Economy.

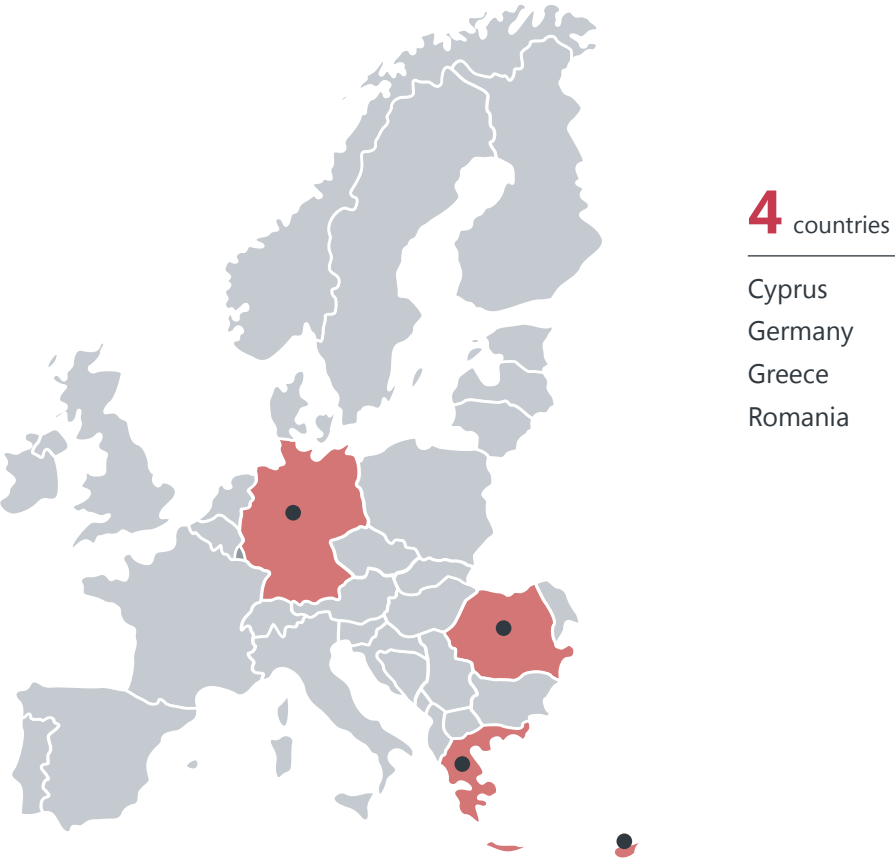
## HISTORICAL OVERVIEW





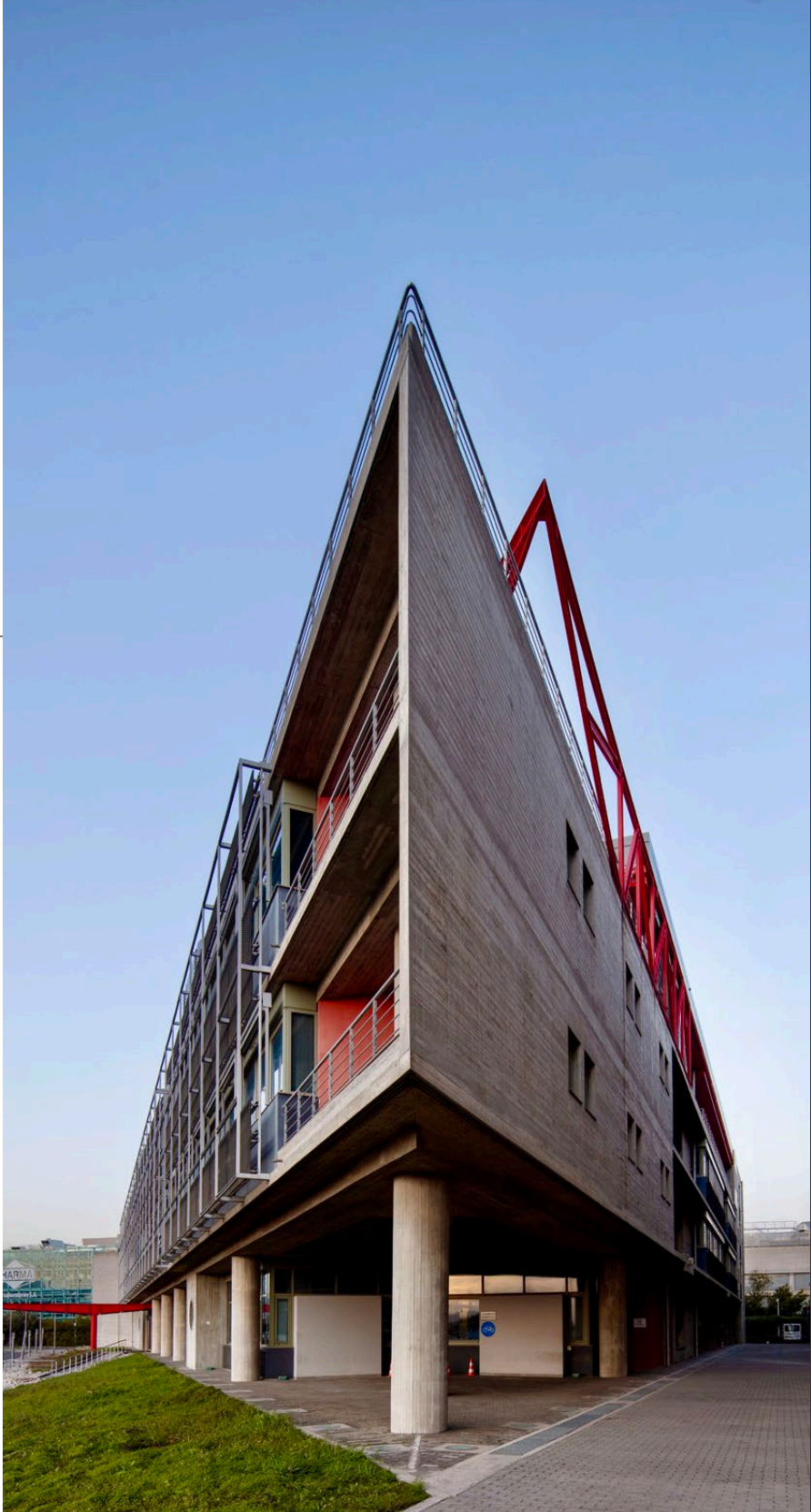
## GROUP STRUCTURE - COUNTRIES OF OPERATIONS

The Group, which consists of 53 subsidiaries, over 12 associates, and approximately 37 joint ventures, recorded a turnover of €387,457 thousand for its continuing operations in the fiscal year 2023<sup>1</sup>.



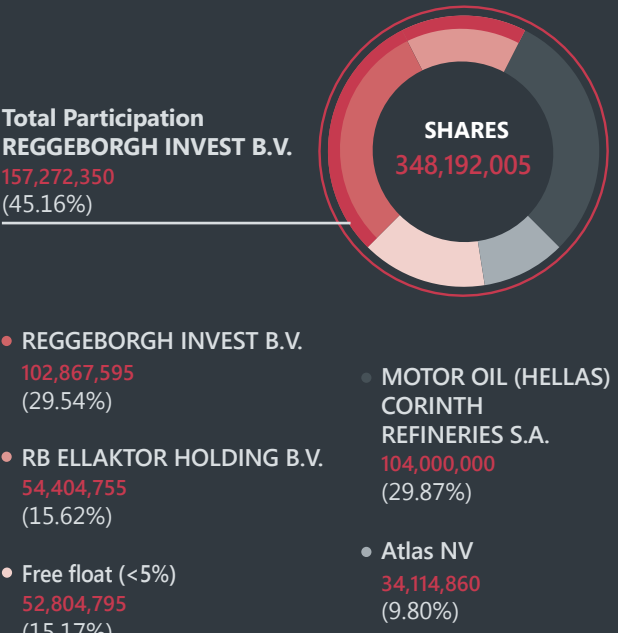
All Group companies and joint ventures are presented in the [Annual Financial Report 2023](#).

<sup>1</sup>Total revenue of the Group for 2023, €808,465 million



## 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 of 31.12.2022, is presented in the following chart.



Further information regarding the Company's shareholder structure is provided in the [Annual Financial Report 2023](#).

## VISION - MISSION - VALUES

### Vision

Our vision is to pave the way for a modern, innovative, safe, and sustainable future.

### Mission

Leveraging the unique expertise of our human resources, we deliver high-quality Infrastructure, Energy, and Environmental projects, creating value for our shareholders, employees and the Greek Economy and Society.

## Corporate Values

- MERITOCRACY AND EQUAL OPPORTUNITIES**  
Foster ethics, meritocracy and equal opportunities in the workplace, with respect for diversity.
- COLLABORATION AND EXCELLENCE**  
Encourage team effort, collaboration and the pursuit of excellence at both individual and collective levels.
- 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.

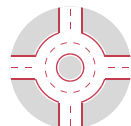
## KEY SEGMENTS

Following the sale of its Construction segment, the Group operates through its subsidiaries in the infrastructure sector, specifically in the Concessions, Environment and Real Estate Development and Services segments.



### ELLAKTOR S.A.

**ELLAKTOR S.A.**, the parent company of the ELLAKTOR Group, is a holding and investment company based in Greece. Its investments focus on the infrastructure sector, primarily in the fields of Concessions, Environment, and Real Estate Development and Services. The company's shares have been traded on the Athens Stock Exchange since April 1994.



### CONCESSIONS

ELLAKTOR Group operates in the Concessions segment through its subsidiary, **AKTOR CONCESSIONS**. AKTOR CONCESSIONS is the largest Greek company in this segment, providing comprehensive project support from design, financing, and construction to maintenance and operation.

Having pioneered major Concession Projects in Greece since 1990, AKTOR CONCESSIONS' portfolio includes stakes in the country's largest and most modern motorways.

The business strategy of the subsidiary AKTOR Concessions, guided by synergies with the Group's other activities, focuses on:

- Participating in new projects via PPPs or concession agreements.

- Expanding and enhancing the efficiency of its existing projects.
- Broadening its stake through the secondary market.

It holds majority stakes in the Attiki Odos (65.8%) and Moreas (71.7%) motorways, as well as significant shares (17-28%) in Olympia Odos, Aegean Motorway and the Rio-Antirrio Bridge. Beyond motorways, the company also holds concessions for parking facilities with a total capacity of 5,639 spaces and manages an additional 2,195 spaces.

Furthermore, AKTOR Concessions has signed a Concession Agreement for the use, operation, management, and exploitation of the Alimos Marina. Regarding the development of Alimos Marina, in June 2024, the Ministries of Environment & Energy and Tourism signed a Joint Ministerial Decision approving the zoning and environmental terms, paving the way for building permits to be issued for the development of the largest marina in the Balkans and one of the most historic and iconic marinas in Greece.

### Important events

In 2023, revenue from the Concessions sector amounted to €283.0 million, compared to €269.0 million in 2022, reflecting an increase of 5.2% or €14.0 million. This revenue growth is attributed to increased traffic across all motorways (+9.2%) and primarily on Attiki Odos (+9.5%) compared to last year.

The EBITDA of the Concessions sector for the fiscal year 2023 amounted to €180.2 million, compared to €151.5 million last year, marking an increase of 18.9% or €28.7 million, influenced by the aforementioned rise in traf-

fic. The EBITDA margin reached 64% in 2023, up from 56% last year. It is noted that the 2022 EBITDA was impacted by a €9.0 million expense due to the effects of the 'Elpis' severe weather event. Without this negative impact, the comparable EBITDA for the sector stands at €160.5 million, making the current year's increase nearly €20 million.

Similarly, operating results (EBIT) amounted to €111.8 million compared to €83.1 million in 2022, an increase of 34.5%. Profit before taxes was €89.8 million, up from €65.8 million (a 36.5% increase), and net profit after taxes amounted to €68.6 million, compared to €46.4 million in 2022 (a 47.9% increase).

On April 21, 2023, the Contracting Authority and the consortium AKTOR Concessions (60%) – INTRAKAT (40%), through the Private Partnership Entity named PYLIA ODOS S.A., signed a 30-year Partnership Agreement for the project 'Study, Construction, Financing, Operation, and Maintenance of the Southwestern Peloponnese Road Axis, Section Kalamata – Rizomylos – Pylos – Methoni', under a PPP».

AKTOR Concessions aims to expand its portfolio of concession projects and, in this context, participates in the tendering process for a series of new Concession and Public-Private Partnership (PPP) projects.

Further information on the prospects, risks, and uncertainties of the Concessions segment is provided in the [2023 Annual Financial Report](#).

## 2023 Review

# €283 million

turnover (5.2% increase compared to 2022)

# 9.5%

increase in vehicle traffic on Attiki Odos and 9.2% on other motorways compared to 2022

# 755 km

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

## approval of the Joint Ministerial Decision (JMD)

for zoning and environmental terms for the development of the new Alimos Marina



### MAJOR 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., PYLIA ODOS S.A.





## ENVIRONMENT

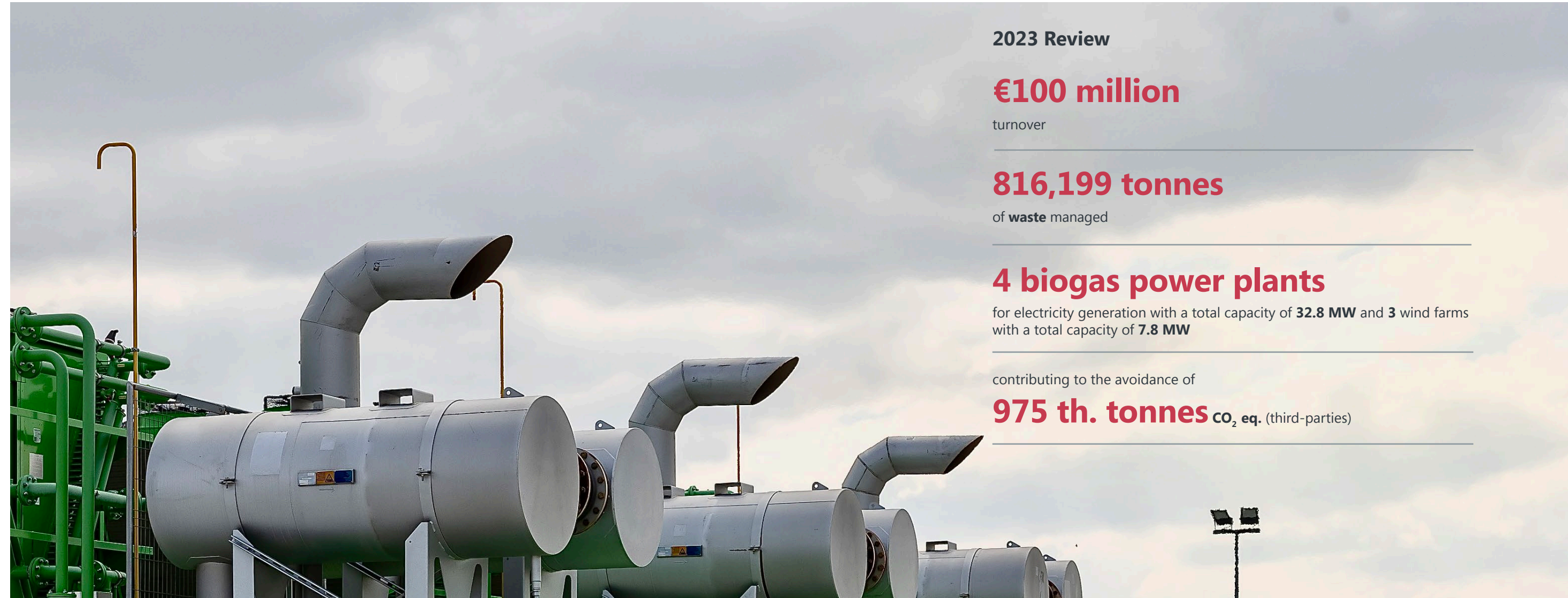
ELLAKTOR Group operates in the Environmental segment for more than 20 years through its subsidiary, **HELECTOR**. HELECTOR is a fully integrated company in the field of waste management and green energy production. Its significant expertise and specialization enable HELECTOR to provide comprehensive waste management solutions, which include the design, construction, and operation of modern waste treatment plants, as well as alternative fuels production and biogas and biomass energy recovery projects.

### Important events

The turnover of the Environmental segment for 2023 amounted to €100.1 million, compared to €122.5 million for the corresponding previous period, marking a decrease of 18.3%. This reduction in turnover was due, on the one hand, to the completion of the contractual operation of the Osnabrück and Kalamata units, and on the other hand, to the decrease in recyclable material prices. These factors were partially offset by increased incoming quantities, the revision (indexation) of waste acceptance prices, and the implementation of new projects (e.g., operation of the Phylis/Liosia Leachate Treatment Unit, implementation of EMA upgrade works, etc.).

In July 2024, ELLAKTOR S.A. entered into an agreement with the company MANETIAL LIMITED, a 100% subsidiary of MOTOR OIL HELLAS CORINTH REFINERIES S.A., for the sale of 94.44% of the shares of HELECTOR S.A. for a total price of €114.7 million. The transaction is subject to approval by the Competition Commission and all other legally required approvals and permits.

Further information on the prospects, risks, and uncertainties of the Environment segment is provided in the [2023 Annual Financial Report](#).



### 2023 Review

**€100 million**

turnover

**816,199 tonnes**

of **waste** managed

**4 biogas power plants**

for electricity generation with a total capacity of **32.8 MW** and **3** wind farms with a total capacity of **7.8 MW**

contributing to the avoidance of

**975 th. tonnes CO<sub>2</sub> eq.** (third-parties)

### MAJOR COMPANIES:

HELECTOR S.A., STEILISATIONS S.A., APOTEFROTIRAS S.A., EDADYM SINGLE MEMBER S.A., SOLID WASTE RECYCLING S.A., BEAL S.A., EPALTHEA S.A., AEIFORIKI DODEKANISOU S.A., J/V HELECTOR – CYBARCO, EPADYM S.A.



## REAL ESTATE DEVELOPMENT AND SERVICES

**REDS S.A.**, a company of ELLAKTOR Group, is one of the leading companies in the real estate development and services sector. The company's investment focus is on acquiring and utilizing properties to enhance their value. In the past, the company acquired agricultural land, which, after urban planning development, was transformed and utilized for organized residential complexes, exhibition centers, office buildings, and mixed-use buildings. Additionally, the company invests in properties that, through strategic repositioning, are reintroduced to the market, improving their value and functionality. The company's business strategy is based on identifying properties with high development potential, maturing them, developing them, finding users, and managing them to maximize their value. Providing services to third parties is another area of REDS' activity, where the company's specialized staff undertakes the full spectrum of real estate development and services, from the maturation phase (technical, legal, urban planning) to property operation.

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 operated the Smart Park Retail Park until November 2023, while Alimos Marina, Gournes Heraklion and Cambas Park projects are under development.

### MAJOR 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 recorded revenues of approximately €10.4 million in 2023, compared to €9.8 million in 2022, marking an increase of 6% or €0.5 million.

Earnings before interest, taxes, depreciation, and amortization (EBITDA) for 2023 amounted to €61.7 million, compared to €6.1 million in 2022.

In the Cambas Project development in Kantza area of the Pallini municipality, following the issuance of a Presidential Decree (P.D.) granting urban planning approval for the Integrated Development Area (POAPD), the Group is in the final stage of updating the business plan. Next, the procedures for shaping the definitive Master Plan will follow. Subsequently, the issuance of building permits and the commencement of construction work will take place, with an estimated comple-



tion horizon within the next three years.

Additionally, in February 2023, the signing of the purchase agreement for the property of the former American base in Gournes, Heraklion, Crete, was completed. As part of the development of this 345,567 square meter property, REDS is expected to undertake investments for the construction of, among other things, a luxury hotel, residential units, and a shopping center.

In October 2023, REDS signed an agreement with the company TRADE ESTATES REIC of the Fourlis Group for the sale of all shares of its 100%-owned subsidiary GY-ALOU COMMERCIAL AND TOURIST SINGLE MEMBER S.A., which owns, manages, and operates the Smart Park commercial park. The transaction was completed in November 2023 with a payment of €95.4 million, further strengthening the Group's liquidity and, consequently, its ability to fund its upcoming investment plans.



## CONSTRUCTION

With the approval of the Competition Commission on 07.11.2023, the financial closing of the sale of all shares of AKTOR S.A. to INTRAKAT S.A. was completed on 08.11.2023. Consequently, the Construction activities are presented as Discontinued Operations (D.O.) and include the activities of AKTOR S.A. and its subsidiaries up until 07.11.2023.

The Construction segment reported revenues of €421.0 million for the period from 01.01 to 07.11.2023, com-

### 2023 Review

**€10.4 million**

turnover

sale of Smart Park for a price of

**€95.4 million**

resulted in a profit of **€46.8 million**

**61.7 million**

**EBITDA** compared to €6,1 million in 2022

**6%**

revenue increase

Further information on the prospects, risks, and uncertainties of the Real Estate Development and Services segment is provided in the [2023 Annual Financial Report](#).

pared to revenues of €542.8 million for the entire 2022 fiscal year, marking a decrease of approximately 22.4%. This reduction is primarily due to the consolidation of the sector for only 10 months in 2023, following the sale of all shares of AKTOR S.A. to INTRAKAT S.A.

Of the total revenue, 62% originated from domestic projects, and 38% from international projects.

AKTOR and its subsidiaries signed new contracts amounting to €342 million in Greece and abroad during 2023 (up to 07.11.2023).

### MAJOR COMPANIES:

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



Value Chain and Business Relationships

ELLAKTOR Group conducted an initial mapping of its value chain to identify the impacts of its business sectors on Sustainable Development issues through its Business Partners.



Business Model

ECONOMIC VALUE GENERATED AND DISTRIBUTED

One of the most material topics for ELLAKTOR Group is the creation and distribution of economic value, as this ensures its business continuity, enhances its positive impact on society, and returns value to its stakeholders. The Group contributes to social welfare through its business activities, meeting the expectations of both the local and broader community.

Group Financial Results for 2023

The Group’s consolidated revenue from all its activities in Greece and abroad for the 2023 fiscal year amounted to €808.5 million, of which €387.5 million pertained to the Group’s continuing operations, compared to €401.2 million in 2022, reflecting a decrease of approximately 3.4%, primarily due to reduced revenue in the Environment segment.

The consolidated financial data of the Group for the 2023 fiscal year reflects the following key indicators:

**Assets: €1,984,749 th**  
**Liabilities: €1,010,066 th.**  
**Equity: €974,683 th.**

Economic Value 2023 (th. €)	ELLAKTOR Group (Total)	Continuing Operations
Net Sales	808,465	387,457
Financial income, other income and profits	153,668	107,574
<b>Economic value generated</b>	<b>962,133</b>	<b>495,031</b>
Operating cost <sup>1</sup>	597,012	205,055
<b>Employees’ salaries and benefits</b>	<b>162,789</b>	<b>75,640</b>
Salaries and wages	122,602	58,517
Social insurance expenses	24,678	12,238
Costs of defined benefit programs	3,068	1,733
Other benefits to employees	12,440	3,152
Payments to capital providers	66,430	53,742
<b>Payments to Government Entities</b>	<b>49,900</b>	<b>43,756</b>
Greece	42,231	42,231
Cyprus	850	850
Germany	25	25
Other countries	649	649
Discontinued Operations	6,144	-
Contribution to Society <sup>3</sup>	848	848
<b>Economic value distributed</b>	<b>876,979</b>	<b>379,041</b>
<b>Economic value retained</b>	<b>85,154</b>	<b>115,989</b>

<sup>1</sup>The amount relating to Operating Costs includes the cost of freelancers.  
<sup>2</sup>The €47.8 th. 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.

The [2023 Annual Financial Report](#), which includes the Report of the Board of Directors and the Annual Financial Statements, is available on the Group’s website.

ELLAKTOR GROUP BUSINESS MODEL

INPUTS	 <b>Financial capital</b> <b>€974.7 million</b> Net Equity of the Group <b>€49.1 million</b> Net borrowing
	 <b>2. PRODUCTIVE CAPITAL</b> <b>€131.9 million</b> Tangible Fixed Assets <b>€203.8 million</b> Intangible Assets and Concessions Rights
	 <b>3. INTELLECTUAL CAPITAL</b> <b>€1.6 million</b> Investments in Digital Transformation <b>6</b> Participations in Research Project
	 <b>4. HUMAN CAPITAL</b> <b>2,260</b> Employees <b>15,128</b> Training hours for Employees
	 <b>5. NATURAL CAPITAL</b> <b>124,149 MWh</b> Energy Consumption <b>1,199 ML</b> Water Withdrawal
	 <b>6. SOCIAL CAPITAL</b> <b>92%</b> Supplies from local suppliers <b>95%</b> Employees from local communities

**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**

**INTEGRITY AND RESPECT**

**COLLABORATION AND EXCELLENCE**

**ENCOURAGEMENT AND ADVANCEMENT**

**ACHIEVEMENT AND EFFICIENCY**

**HEALTH AND SAFETY**

**INNOVATION AND BEST PRACTICES**

**MAIN OPERATIONS**

**CONCESSIONS****ENVIRONMENT****REAL ESTATE DEVELOPMENT AND SERVICES**



**E - ENVIRONMENT**

- Climate Change & Circular Economy








**G - GOVERNANCE**

- Integrity and Business Ethics
- Innovation & Digital Transformation

**S - SOCIETY**

- Employee Health, Safety & Development
- Social Responsibility

Note: The figures presented refer to the Group’s continuing operations, except for the financial data, which pertains to the Group’s total activity.

<b>Financial capital</b> <b>€808.5 million</b> Consolidated Revenue <b>€228.5 million</b> EBITDA	
<b>2. PRODUCTIVE CAPITAL</b> <b>10</b> RES projects in operation <b>755 km</b> Motorways under management	 
<b>3. INTELLECTUAL CAPITAL</b> <b>€2.2 million</b> (Goodwill)	
<b>4. HUMAN CAPITAL</b> <b>€75.6 million</b> Employee benefits <b>Zero</b> incidents of human rights violations, corruption, and bribery	   
<b>5. NATURAL CAPITAL</b> <b>223 GWh</b> Net electricity generated from Renewable Energy Sources <b>816.199 tonnes</b> of waste managed	   
<b>6. SOCIAL CAPITAL</b> <b>€43.8 million</b> Taxes paid <b>€848,149</b> investment in Society	 

OUTCOMES



## Sustainable Development in ELLAKTOR Group

At ELLAKTOR Group, active contribution and effective promotion of sustainable development are at the core of its operational planning and the activities of its segments. Ensuring a fair and safe working environment, making a meaningful economic contribution, supporting local communities, and reducing the environmental impact of its activities are fundamental principles of its business strategy and philosophy. These commitments, a key driver for the fulfillment of the Group's mission, are embodied through modern infrastructure projects that, for decades, have contributed to improving people's quality of life and developing local communities, while simultaneously creating added value for all stakeholders.

progress related to the ESG (Environmental, Social, and Governance) goals that have been set and to integrate the concept of sustainability throughout the organization

The Company's Board of Directors is responsible for adopting and approving the Sustainable Development Policy, approving its updates, and overseeing its implementation across all Group companies, with the support of the Sustainable Development Committee and

the Group's ESG Strategy & Sustainable Development Division.

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. The ESG Strategy & Sustainable Development Division reports to the Group's Development Strategy Division.

The reporting process regarding the performance of the Group's companies on Sustainable Development issues for 2023 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.

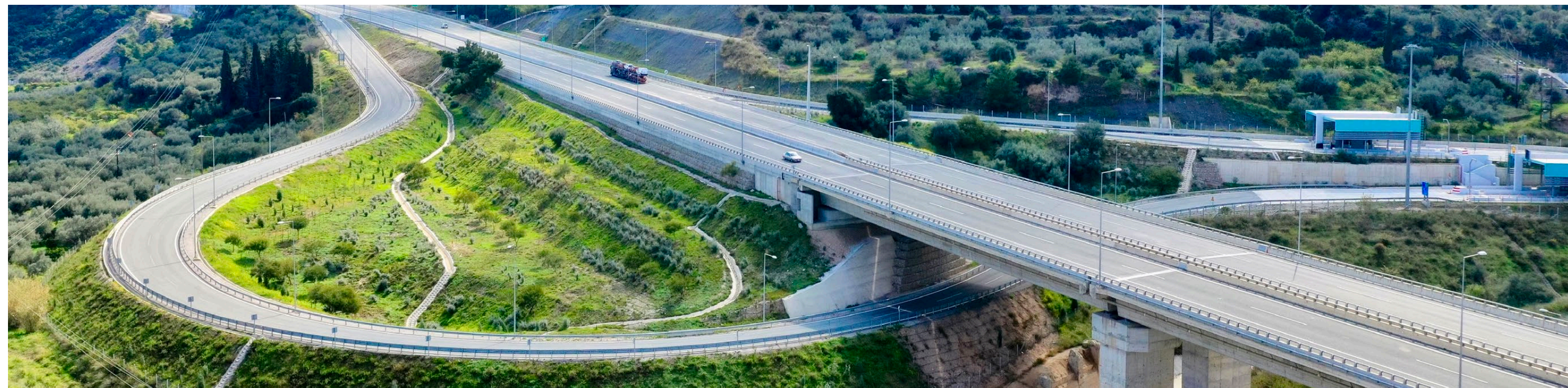
The results of the materiality analysis (double materiality) carried out at the beginning of 2023 and presented in detail below, are in line with the Group's strategy, objectives and sustainable development priorities, set for both the Group and its companies.

### SUSTAINABLE DEVELOPMENT STRATEGY AND KEY PRIORITIES

ELLAKTOR Group's business strategy focuses on strengthening its footprint in the Concessions, Environment and Real Estate Development and Services 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.

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.

As ELLAKTOR Group considers the promotion of sustainability across its entire structure, including its supply chain, one of its most critical issues, it has established an appropriate governance structure. This structure aims to oversee

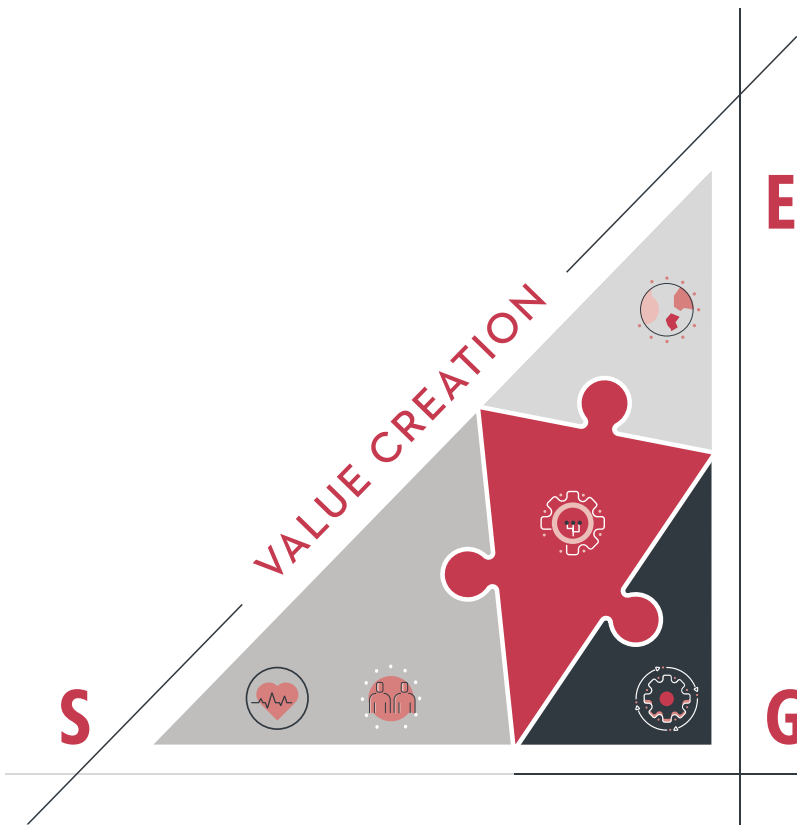




## Key Strategic Pillars

For ELLAKTOR Group, Climate Change and the Circular Economy, Employee Health, Safety and Development, Social Responsibility, and Integrity and Business Ethics are key pillars of Sustainable Development. 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:



### Innovation & 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 opportunities for a more efficient use of technology in our activities.



### Climate Change & 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.

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

The revised [Sustainable Development Policy](#) of ELLAKTOR Group, in effect since March 2022, aims to create long-term value for shareholders, employees, customers, and society at large by incorporating environmental, social, and governance (ESG) principles across all its business activities. Through this policy, the Group is committed to reducing its environmental footprint by adopting sustainable practices, promoting a circular economy with innovative waste management solutions, and strengthening its impact on green energy production

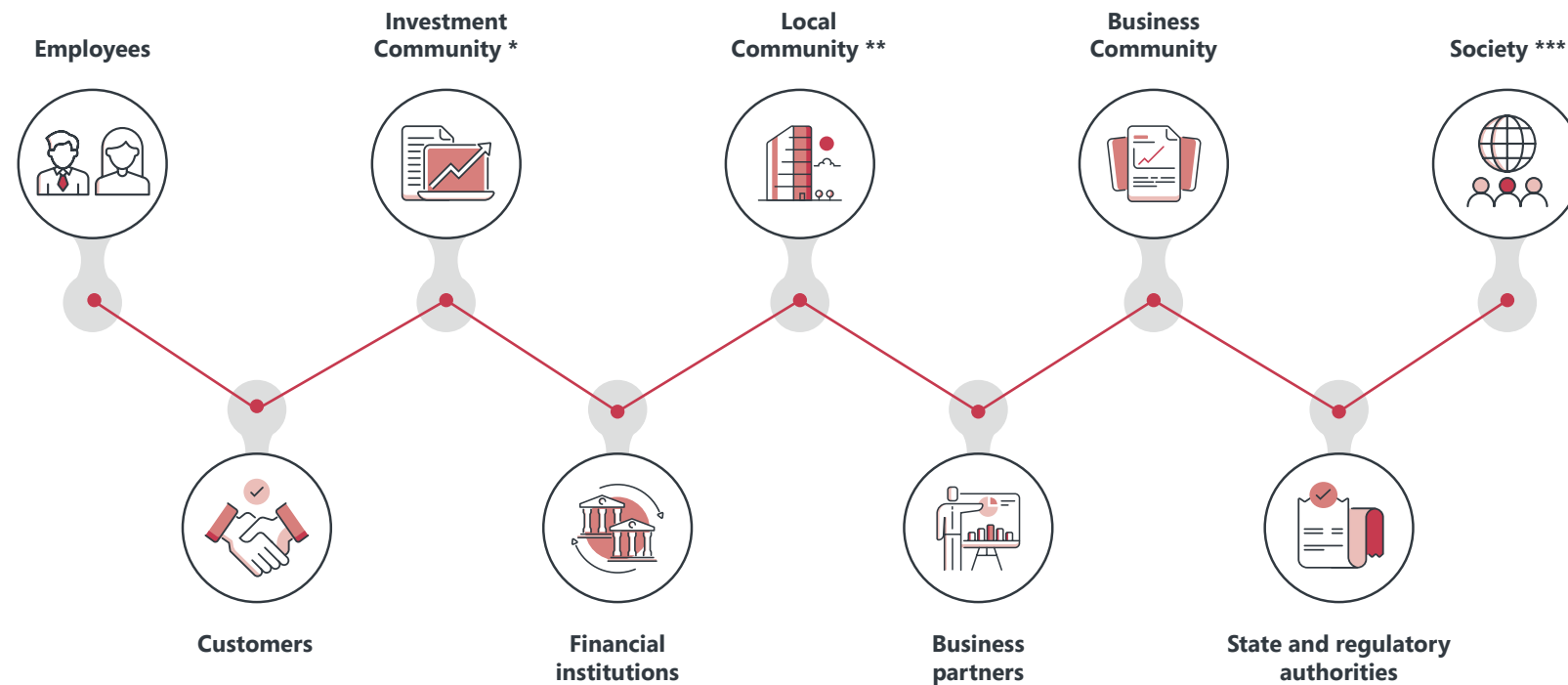
By following best international practices and recognized standards, the Group's sustainable development actions are fully aligned with its corporate values: meritocracy and equal opportunities, collaboration and excellence, achievement and efficiency, innovation and best practices, integrity and respect, encouragement and growth, as well as health and safety.





## 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).



\* Shareholders, investors and ESG rating agencies

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

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

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](#).

The ELLAKTOR Group's Corporate Communications Division is responsible for the planning and implementation of communication actions for all the Group's activities and its subsidiary companies, aimed at both external and internal audiences, in Greece as well as in all the countries in which it operates.

The Corporate Communications Division implements policies for managing and protecting the Group's corporate reputation, designing and executing communication in full alignment with the Group's vision and values, ensuring effective communication with stakeholders, and aligning the entire Group with these policies and the approved communication strategy. Specifically, the Corporate Communications Department has adopted and enforces a series of policies, including the Media Relations and Group Press Office Policy, the Group Advertising Policy, the Group Social Media Management Policy, the Internal Communication Policy, the Public Statements Policy, and the Financial Communication Policy.

At the same time, the Group's communication with the investment community (Shareholders/Investors) is conducted through a structured process, based on the Investor Relations Policy, which outlines the principles and procedures through which the Group ensures accurate, prompt, regular, and equitable information for its shareholders, providing all necessary clarifications and information regarding the exercise of their rights arising from their status as shareholders.

## 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. Through the process of double materiality, the Group evaluates, on one hand, its impacts on the environment, society, and the economy, including impacts on human rights (impact materiality), and, on the other hand, the financial risks and opportunities arising from the environment and society towards the Group (financial materiality). This affects its business value, meaning the economic value generated through its activities, in the short, medium, and long term.

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 material topics presented within the framework of the 2023 Sustainable Development Report are based on the double materiality analysis conducted in 2023.

The materiality analysis was carried out according to the following steps:

### UNDERSTANDING ELLAKTOR GROUP'S OPERATING CONTEXT

- ▶ Review of the Group's activities and operating framework.
- ▶ Overview of the business model.
- ▶ Overview of key stakeholder groups and the value chain.
- ▶ Overview of the Group's external environment (e.g., peer companies).

1<sup>st</sup> step

### IDENTIFICATION OF IMPACTS, RISKS, AND OPPORTUNITIES

- ▶ Identification of positive and negative (actual and potential) impacts of the Group on the economy, environment and society, including impacts on human rights and grouping these into Sustainable Development issues.
- ▶ Identification of the Group's Financial Risks and Opportunities arising from environmental, social, or governance issues, taking into account the recognized positive and negative (actual and potential) impacts and grouping these into Sustainable Development issues.

2<sup>nd</sup> step

### ANALYSIS OF IMPACTS, RISKS AND OPPORTUNITIES

A survey was conducted with the participation of Senior Management, employees, and external stakeholders regarding the analysis of environmental, social, and economic impacts, including impacts on human rights, along with targeted meetings with specialists to evaluate financial risks and opportunities related to the Group's operations.

Criteria for Evaluating Positive (Actual and Potential) Impacts:

- ▶ Scale: How beneficial the specific impact is or could be.
- ▶ Scope: The extent of the impact, i.e., how wide-spread this particular impact is.
- ▶ Likelihood: The likelihood of the impact occurring.

Criteria for Evaluating Negative (Actual and Potential) Impacts:

- ▶ Scale: The severity of the specific impact.
- ▶ Scope: The extent of the impact, i.e., how wide-spread this particular impact is.
- ▶ Irremediable Character: The difficulty in managing or remedying the damage caused by the impact.
- ▶ Likelihood: The likelihood of the impact occurring.

Criteria for Evaluating Financial Risks and Opportunities:

- ▶ Likelihood of Occurrence.
- ▶ Potential Magnitude of Financial Impact

3<sup>rd</sup> step

### PRIORITIZATION OF MATERIAL TOPICS

- ▶ Analysis of Survey Results and Prioritization of Material Topics.
- ▶ **Determination of Materiality Threshold:** A threshold was established to define which Sustainable Development issues are considered material.
- ▶ **Review and Approval of Material Issue Prioritization by Group Management.**


4<sup>th</sup> step



Below is a detailed presentation of the results from the analysis of the identified impacts, risks, and opportunities, and their grouping into Sustainable Development issues:

Double Materiality Analysis

TABLE OF MATERIAL TOPICS AND IMPACTS

	Material Topic	Main impact
	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 (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.

Type of impact

+

Positive

—

Negative

Level of materiality


Low

Medium

High

Type of impact	Impact materiality level	Financial materiality level	Double materiality
+			
—			
+			
—			
+			
—			
+			
—			
+			
—			
+			
—			

TABLE OF MATERIAL TOPICS AND IMPACTS

	Material Topic	Main impact
	Economic value generation and distribution	Economic value generated for the benefit of the Group, local communities and other stakeholders. Development and quality of improvement, supporting the economy, contributing to the creation of sustainable cities.
		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.
		Accidents and occupational diseases (including mental health) during work (employees and/or business partners).
	Infrastructure safety and user experience	Ensuring user's health, safety and experience safer and greener transportation and development of a more sustainable urban environment.
		Potential infrastructure security incidents.
	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.
		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.
	Employment practices, training and development	Providing opportunities for personal and professional development and training for employees, enhancing their knowledge and skills.
		N/A
	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.
		Potential disruption of trust and reputation, interruption or suspension of projects, nuisance.

Type of impact	Impact materiality level	Financial materiality level	Double materiality
+			
-			
+			
-			
+			
-			
+			
-			
+			
-			
+			
-			

Type of impact

+

 Positive

-

 Negative

Level of materiality


 Low















 Medium

 High



TABLE OF MATERIAL TOPICS AND IMPACTS

Material Topic		Main impact
<div><div>G</div><div></div></div>	Compliance, integrity and business ethics	Seamless operation and value creation for society through compliance with the applicable legal and regulatory framework.
		Possible incidents of poor compliance with laws and regulations by employees or business partners.
	Reinforcement of innovation, research and digital transformation	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.
		N/A
	Business continuity and emergency preparedness	Implementation of policies and procedures to ensure critical functions and business continuity in the event of an emergency.
		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.
	Promoting sustainability in the supply chain	Promotion of responsible business and sustainable development across the supply chain, contribution to the development of sustainable cities and communities.
		N/A

Type of impact	Impact materiality level	Financial materiality level	Double materiality
+			
-			
+			
-			
+			
-			
+			
-			

Type of impact

+

 Positive

-

 Negative

Level of materiality

 Low

 Medium

 High

Double materiality analysis

Subsequently, based on the results of the double materiality analysis, the following prioritization of material topics was established.

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



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.








It is worth mentioning that, in this regard, the Group participated in 2023 in United Nations programs (Business & Human Rights Accelerator, Peer Learning Groups on Gender Equality, Target Gender Equality, Climate Ambition Accelerator) with the aim of further educating its executives in developing appropriate tools for the Group’s more substantive contribution to achieving Sustainable Development Goals.

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


	Targets directly or indirectly related to the Group’s activities	ELLAKTOR Group’s contribution	Results
	<div><div></div><div></div></div>	<ul style="list-style-type: none"><li>▪ Creating decent jobs and working conditions.</li><li>▪ Supporting the local economy through hiring and sourcing goods and services from the local community.</li><li>▪ Supporting vulnerable groups by providing employment opportunities without discrimination.</li><li>▪ Supporting and economically empowering individuals in vulnerable situations during times of crisis.</li></ul>	<ul style="list-style-type: none"><li>▪ Provided <b>direct employment for 2,260 people</b>.</li><li>▪ Provided access to the labor market to <b>9 young engineers</b> through professional training and internship programs.</li><li>▪ In 2023, <b>3 people with disabilities</b> were employed within the Group.</li><li>▪ Immediate response by collecting and sending essential supplies (<b>more than 210 boxes</b>) to support those affected by the war in Ukraine, the devastating earthquake in Turkey &amp; Syria, and the floods in Thessaly.</li></ul>




	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
	<div><div>TARGET 2-1 UNIVERSAL ACCESS TO SAFE AND NUTRITIOUS FOOD</div><div>TARGET 2-2 END ALL FORMS OF MALNUTRITION</div></div>	<ul style="list-style-type: none"><li>Support for small food producers aimed at increasing their productivity and income.</li><li>Minimizing food waste through employee awareness and information initiatives, contributing to the reduction of hunger and malnutrition.</li></ul>	<ul style="list-style-type: none"><li>Supported for the second consecutive year the Hope Boxes program by the non-profit Initiative Wise Greece, offering about <b>3 tonnes of essential food of high nutritional value</b>. The beneficiaries of this action of the Group amounted to more than <b>1,116 families</b>, through monthly meal distributions.</li><li><b>We trained 228 employees</b> of the Group in reducing food loss and waste in collaboration with We4All.</li></ul>
	<div><div>TARGET 3-2 END ALL PREVENTABLE DEATHS UNDER 5 YEARS OF AGE</div><div>TARGET 3-6 REDUCE ROAD INJURIES AND DEATHS</div><div>TARGET 3-9 REDUCE ILLNESSES AND DEATH FROM HAZARDOUS CHEMICALS AND POLLUTION</div></div>	<ul style="list-style-type: none"><li>We contribute to creating safe health conditions for our employees and the local communities of the Group.</li><li>The Group's companies implement certified Health and Safety Management Systems.</li><li>We develop programs to educate and raise awareness among children and adults on road safety issues.</li><li>We take preventive measures whenever potential risks are identified, aiming to eliminate accidents and health incidents</li><li>We contribute to enhancing Health and Safety through the rational use of chemicals and continuous training, in accordance with their Safety Data Sheets (SDS).</li><li>We respond to the needs of the National Health System, aiming to create quality healthcare services</li></ul>	<ul style="list-style-type: none"><li><b>We supported a range of organizations</b>, such as the Association for Children with Special Needs 'ELPIDA,' the NGO 'Make-A-Wish Greece,' the non-profit organization 'DIAZOMA,' 'SOS Children's Villages Greece,' the Third Pediatric Clinic of the National and Kapodistrian University of Athens, and others.</li><li>ATTIKI ODOS <b>continued 6 educational programs on road safety</b> and traffic education in approximately <b>400 schools, including 12 Special Schools</b>.</li><li>We trained <b>100 employees</b> from the Group's headquarters in <b>first aid</b> (CPR technique and choking assistance).</li><li>We conducted <b>5,803 training sessions on Health and Safety</b> for Group employees and subcontractor employees.</li><li>We collected <b>503 units of blood</b>.</li></ul>

	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
	<div><div>TARGET 4-1 FREE PRIMARY AND SECONDARY EDUCATION</div><div>TARGET 4-4 INCREASE THE NUMBER OF PEOPLE WITH RELEVANT SKILLS FOR FINANCIAL SUCCESS</div><div>TARGET 4-7 EDUCATION FOR SUSTAINABLE DEVELOPMENT AND GLOBAL CITIZENSHIP</div></div>	<ul style="list-style-type: none"><li>We continuously enhance employee training programs, either through internal training programs or in collaboration with external organizations, aiming at their intellectual development.</li><li>We participate in programs aimed at supporting primary, secondary, and higher education, focusing on the inclusion of vulnerable groups.</li><li>We conduct training on sustainable development for the Group's employees and the local community in which we operate.</li></ul>	<ul style="list-style-type: none"><li><b>1,883 employees (83%)</b> of the Group were trained.</li><li>We participate in the '<b>ExcellenSeas</b>' program, aiming to provide academic support to a student from the remote island of Fournoi.</li><li><b>10 courses</b> have been created on the Group's E-learning platform.</li><li>We implement a <b>tool for delivering monthly messages</b> on sustainable development topics to further raise employee awareness.</li><li>An 8-hour <b>training session</b> was organized for the Group's senior executives on <b>ESG and Sustainable Development topics</b>.</li><li>Launch of the <b>SDGs Coffee Breaks educational program</b>, in collaboration with the non-profit initiative Wise Greece, to inform and raise awareness among the Group's employees about the Sustainable Development Goals.</li><li>In <b>2023, we carried out the first two open initiatives engaging the local community</b> on Sustainable Development topics, with participation from <b>over 1,800 people</b>.</li><li>We conducted <b>environmental training sessions in 5 schools</b> in areas where the Group operates.</li></ul>
	<div><div>TARGET 5-1 END DISCRIMINATION AGAINST WOMEN AND GIRLS</div><div>TARGET 5-2 END ALL VIOLENCE AGAINST AND EXPLOITATION OF WOMEN AND GIRLS</div></div>	<ul style="list-style-type: none"><li>We recognize the economic and social benefits of gender equality and implement policies and practices that prevent gender discrimination in the workplace, the market, and society.</li></ul>	<ul style="list-style-type: none"><li>Implement a <b>Diversity, Equity &amp; Inclusion Policy</b>.</li><li>Implement a <b>Policy for the Prevention and Combatting of Workplace Harassment</b>.</li><li>Signed the <b>U.N. Women's Empowerment Principles</b> (WEPs).</li><li>Signed the <b>Diversity Charter for Greek Businesses</b>.</li></ul>

 It concerns priority goals for the Group






	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
	<div><div>TARGET 5-5</div><div>ENSURE FULL PARTICIPATION IN LEADERSHIP AND DECISION-MAKING</div></div> <div><div>TARGET 5-C</div><div>ADOPT AND STRENGTHEN POLICIES AND ENFORCEABLE LEGISLATION FOR GENDER EQUALITY</div></div>	<ul style="list-style-type: none"><li>▪ We support the employment of women and promote gender equality in the business and supply chain at all levels.</li></ul>	<ul style="list-style-type: none"><li>▪ We participate in the <b>United Nations Target Gender Equality program</b>.</li><li>▪ <b>34% of the Group's employees are women</b>.</li><li>▪ <b>1<sup>st</sup> female CEO</b> in ELLAKTOR Group's subsidiary company, REDS.</li><li>▪ <b>57% of C-level positions are held by women</b>.</li></ul>
	<div><div>TARGET 6-1</div><div>SAFE AND AFFORDABLE DRINKING WATER</div></div> <div><div>TARGET 6-3</div><div>IMPROVE WATER QUALITY, WASTEWATER TREATMENT AND SAFE REUSE</div></div> <div><div>TARGET 6-4</div><div>INCREASE WATER-USE EFFICIENCY AND ENSURE FRESHWATER SUPPLIES</div></div>	<ul style="list-style-type: none"><li>▪ We implement <b>methods for reusing treated water</b>, while also conducting frequent analyses of the quality of wastewater generated from waste management facilities.</li><li>▪ <b>We monitor and assess water usage</b> and its impact on water resources, implementing procedures to improve local watershed conditions, mitigate impacts, and support <b>responsible water management and usage</b>.</li></ul>	<ul style="list-style-type: none"><li>▪ Through its Leachate and Liquid Waste Treatment Units, <b>HELECTOR processed 623,000 m<sup>3</sup> of leachate</b> generated from its operations, which was reused in the biological treatment process of waste and/or for irrigation of facility areas.</li><li>▪ Overall, <b>14% of the water</b> withdrawn was directed to <b>recycling or reuse</b>.</li><li>▪ <b>In 100% of the Group's projects/activities</b>, we ensure equitable access to sanitation facilities.</li><li>▪ In 100% of the Group's projects/activities, provisions are always made for <b>safe and potable water</b>.</li></ul>

	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
<div><div>7 AFFORDABLE AND CLEAN ENERGY</div></div>	<div><div>TARGET 7-2</div><div>INCREASE GLOBAL PERCENTAGE OF RENEWABLE ENERGY</div></div>	<ul style="list-style-type: none"><li>▪ We contribute to mitigating the impacts of climate change and to providing access to affordable and clean energy for all through the production of clean electricity from renewable energy sources (RES).</li></ul>	<ul style="list-style-type: none"><li>▪ <b>223 GWh of clean electricity production from renewable energy sources (RES).</b></li></ul>
<div><div>8 DECENT WORK AND ECONOMIC GROWTH</div></div>	<div><div>TARGET 8-2</div><div>DIVERSIFY, INNOVATE AND UPGRADE FOR ECONOMIC PRODUCTIVITY</div></div> <div><div>TARGET 8-5</div><div>FULL EMPLOYMENT AND DECENT WORK WITH EQUAL PAY</div></div> <div><div>TARGET 8-6</div><div>PROMOTE YOUTH EMPLOYMENT, EDUCATION AND TRAINING</div></div> <div><div>TARGET 8-7</div><div>END MODERN SLAVERY, TRAFFICKING AND CHILD LABOUR</div></div> <div><div>TARGET 8-8</div><div>PROTECT LABOUR RIGHTS AND PROMOTE SAFE WORKING ENVIRONMENTS</div></div>	<ul style="list-style-type: none"><li>▪ We support the Greek economy and <b>create value, part of which we distribute to society.</b></li><li>▪ <b>We aim at creating quality jobs</b>, both low and highly skilled, with full-time employment and satisfactory wages, providing equal opportunities to all employees regardless of gender, age, nationality, beliefs, or physical abilities. Additionally, we select personnel based on meritocratic and reliable methods.</li><li>▪ We leverage <b>student employment programs</b>, providing training opportunities to interested participants and creating possibilities for permanent employment for young scientists.</li><li>▪ We implement <b>Health and Safety Management Systems</b> in the Group's offices and projects.</li></ul>	<ul style="list-style-type: none"><li>▪ <b>€76 million</b> in <b>salaries</b> and <b>benefits</b> for Group employees.</li><li>▪ We implement a <b>Human Rights Policy</b>, under which any form of forced labor is prohibited, as well as the employment of children below the minimum age established by the laws of the countries in which we operate.</li><li>▪ We participate in <b>8 research projects</b>.</li><li>▪ We conducted <b>5,803 hours of Health and Safety training</b> for the Group's employees and subcontractors</li><li>▪ <b>9 students</b> were employed in <b>internship programs</b>.</li><li>▪ Health and Safety Management Systems are implemented in <b>100% of the Group's projects</b>.</li><li>▪ The <b>gender pay gap</b> stands at 18% in favor of men, showing a <b>38% improvement</b> compared to 2022.</li></ul>

 It concerns priority goals for the Group












	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
	<div><div>TARGET 9-1 DEVELOP SUSTAINABLE, RESILIENT AND INCLUSIVE INFRASTRUCTURES</div><div>TARGET 9-5 ENHANCE RESEARCH AND UPGRADE INDUSTRIAL TECHNOLOGIES</div></div>	<ul style="list-style-type: none"><li>▪ We create infrastructure that contributes to sustainable development and <b>empowers local communities</b>.</li><li>▪ We invest in the <b>development of modern technologies</b>, leveraging the advantages offered by the internet, digital media, and new technologies.</li></ul>	<ul style="list-style-type: none"><li>▪ We participate in <b>8 research projects</b> aimed at optimizing the Group's operations and modernizing its projects.</li><li>▪ <b>100% of the Group's concession projects</b> are <b>high-quality, reliable, sustainable, and resilient</b>, focusing on affordable and equitable access.</li></ul>
	<div><div>TARGET 10-2 PROMOTE UNIVERSAL SOCIAL, ECONOMIC AND POLITICAL INCLUSION</div><div>TARGET 10-3 ENSURE EQUAL OPPORTUNITIES AND END DISCRIMINATION</div></div>	<ul style="list-style-type: none"><li>▪ We implement Policies and Procedures to support equal opportunities for all, across all Group operations and throughout the Value Chain.</li></ul>	<ul style="list-style-type: none"><li>▪ Implement a <b>Diversity, Equity &amp; Inclusion Policy</b>.</li><li>▪ Signed the <b>U.N. Women's Empowerment Principles</b> (WEPs).</li><li>▪ <b>9% of the Group's employees</b> have a <b>different nationality</b> from the country in which they are employed.</li></ul>

	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
 	<div><div>TARGET 11-2 AFFORDABLE AND SUSTAINABLE TRANSPORT SYSTEMS</div><div>TARGET 11-4 PROTECT THE WORLD'S CULTURAL AND NATURAL HERITAGE</div><div>TARGET 11-5 REDUCE THE ADVERSE EFFECTS OF NATURAL DISASTERS</div><div>TARGET 11-6 REDUCE THE ENVIRONMENTAL IMPACT OF CITIES</div><div>TARGET 11-7 PROVIDE ACCESS TO SAFE AND INCLUSIVE GREEN AND PUBLIC SPACES</div></div>	<ul style="list-style-type: none"><li>▪ We contribute to the development and operation of projects that enhance the well-being of city residents and create a more <b>friendly and sustainable urban environment</b>.</li><li>▪ <b>We recognize the importance of historical and cultural heritage</b>, and the opportunity projects provide for uncovering archaeological findings. We implement procedures and measures in accordance with the law, under the supervision of archaeologists and archaeological authorities in the event of archaeological discoveries.</li><li>▪ We leverage our experience and resources to <b>support cultural initiatives</b> (such as the restoration/preservation of culturally significant buildings and archaeological work).</li><li>▪ <b>We analyze and assess potential risks potential risks arising from the Group's operations and projects, implementing proactive measures</b> to minimize these risks, effectively manage emergency situations, and ensure the uninterrupted and efficient functioning of urban areas.</li><li>▪ We promote the <b>development of safe, resilient projects</b> with careful consideration of the impacts of climate change and potential natural disasters.</li></ul>	<ul style="list-style-type: none"><li>▪ The assessment of climate risks and opportunities was completed within the framework of the TCFD, <b>contributing to the improved resilience of the Group, its activities, and its projects to the impacts of climate change</b>.</li><li>▪ In HELECTOR's biogas power plants, the amount of landfill biogas used for energy production was <b>1,875,781 MMBtu</b>, preventing the release of greenhouse gases (specifically methane, CH<sub>4</sub>) and significantly improving air quality.</li><li>▪ <b>808 thousand tonnes</b> of non- hazardous waste were processed at HELECTOR's treatment plants.</li><li>▪ <b>755km</b> highways.</li><li>▪ Access to the Alimos Marina project is <b>freely available to everyone</b>.</li></ul>

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	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
 	<div><div>TARGET 12-2</div><div>SUSTAINABLE MANAGEMENT AND USE OF NATURAL RESOURCES</div></div> <div><div>TARGET 12-4</div><div>RESPONSIBLE MANAGEMENT OF CHEMICALS AND WASTE</div></div> <div><div>TARGET 12-5</div><div>SUBSTANTIALLY REDUCE WASTE GENERATION</div></div> <div><div>TARGET 12-6</div><div>ENCOURAGE COMPANIES TO ADOPT SUSTAINABLE PRACTICES AND SUSTAINABILITY REPORTING</div></div>	<ul style="list-style-type: none"><li>▪ We implement <b>Environmental Management Policies and Systems</b> to ensure compliance with regulatory frameworks for chemical management, in accordance with Safety Data Sheets and manage waste in accordance with applicable environmental legislation.</li><li>▪ <b>We enhance circular economy practices</b>, through our Environment segment activities, including waste management, the separation and recovery of recyclable materials, the production of alternative fuels, and the energy utilization of biogas.</li><li>▪ <b>We publish an annual Sustainable Development Report.</b></li><li>▪ <b>We produce composting products</b> through our Environment segment.</li></ul>	<ul style="list-style-type: none"><li>▪ We contributed to the <b>prevention of 976 thousand tons of CO<sub>2</sub> eq. emissions</b> (third parties).</li><li>▪ Production of <b>950 tonnes of composting products</b> from HELECTOR's activities.</li><li>▪ We managed <b>816 thousand tonnes of solid waste and 623 thousand m<sup>3</sup> of wastewater</b> from the Group's total activities, contributing to the circular economy and the protection of biodiversity.</li></ul>
	<div><div>TARGET 13-1</div><div>STRENGTHEN RESILIENCE AND ADAPTIVE CAPACITY TO CLIMATE RELATED DISASTERS</div></div> <div><div>TARGET 13-3</div><div>BUILD KNOWLEDGE AND CAPACITY TO MEET CLIMATE CHANGE</div></div>	<ul style="list-style-type: none"><li>▪ <b>We implement processes to reduce energy consumption from non-renewable sources</b> for the Group's operations.</li><li>▪ To ensure its <b>resilience against risks arising from climate change</b>, ELLAKTOR Group aims to establish its strategy by considering <b>five different climate scenarios</b>.</li><li>▪ To contribute to the Group's reduction of greenhouse gas emissions and the fight against climate change, <b>we are committed to setting targets in alignment with the Science Based Targets initiative (SBTi).</b></li></ul>	<ul style="list-style-type: none"><li>▪ <b>We reduced</b> Scope 1 &amp; 2 greenhouse gas emissions <b>by 27%</b> compared to 2021.</li><li>▪ <b>We completed the design of our Roadmap</b> to achieve net-zero greenhouse gas emissions by 2050.</li><li>▪ <b>We identified and assessed climate risks</b> and their potential financial impacts in alignment with the recommendations of the <b>TCFD</b> (Task Force on Climate-related Financial Disclosures).</li><li>▪ We implement a certified business continuity system in accordance with <b>ISO 22301:2019</b>.</li></ul>

 It concerns priority goals for the Group

	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results
 	<div><div>TARGET 14-1</div><div>REDUCE MARINE POLLUTION</div></div> <div><div>TARGET 14-2</div><div>PROTECT AND RESTORE ECOSYSTEMS</div></div>	<ul style="list-style-type: none"><li>▪ For all projects, we take all necessary preventive measures to <b>avert any form of marine pollution</b>.</li><li>▪ We collaborate with NGOs and organizations to support a range of environmental initiatives aimed at cleaning the seabed and coastal areas, <b>contributing to the protection of marine and coastal ecosystems</b>.</li><li>▪ We conduct training and initiatives to raise awareness among the Group's employees on <b>reducing marine plastic pollution</b>.</li></ul>	<ul style="list-style-type: none"><li>▪ At the Alimos Marina project, in 2023, <b>the water quality of the tourist port is systematically monitored</b> by an independent body.</li><li>▪ With the support of the Group, the second phase of the environmental <b>seabed cleanup initiative</b>, 'Clean Ocean - Contributing to a More Sustainable Future', was carried out alongside the island of Ydrousa in Voula by XTERRA Greece and the Municipality of Vari Voula Vouliagmeni.</li><li>▪ ELLAKTOR Group, in collaboration with We4All and the Municipality of Alimos, <b>organized a beach cleanup</b> near Alimos Marina.</li></ul>
	<div><div>TARGET 15-1</div><div>CONSERVE AND RESTORE TERRESTRIAL AND FRESHWATER ECOSYSTEMS</div></div> <div><div>TARGET 15-2</div><div>END DEFORESTATION AND RESTORE DEGRADED FORESTS</div></div> <div><div>TARGET 15-4</div><div>ENSURE CONSERVATION OF MOUNTAIN ECOSYSTEMS</div></div> <div><div>TARGET 15-5</div><div>PROTECT BIODIVERSITY AND NATURAL HABITATS</div></div>	<ul style="list-style-type: none"><li>▪ <b>We undertake initiatives aimed at protecting biodiversity</b>, in compliance with legislation and environmental requirements, as well as the environmental management processes applied to projects in areas of high environmental value.</li><li>▪ We consider the specific environmental requirements of activities near sensitive areas and <b>monitor protected species</b> (flora and fauna).</li></ul>	<ul style="list-style-type: none"><li>▪ <b>We are a member of the "Environmental Alliance"</b> founded by the non-profit Environmental Organization We4all, and we have carried out the following initiatives:<ul style="list-style-type: none"><li>• <b>Donation of 500 new fruit-bearing saplings</b> to affected areas.</li><li>• <b>Donation and planting of 120 new forest saplings</b> in an affected area of Attica, with the participation of the Group's employees and their families.</li><li>• Collection of <b>2,500 liters of waste</b> from a beach during a volunteer cleanup initiative with employees and members of the local community.</li></ul></li></ul>

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<div></div>	Targets directly or indirectly related to the Group's activities	ELLAKTOR Group's contribution	Results						
<div><div>16</div><div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div><div></div><div></div></div>	<div><div>TARGET 16-1</div><div></div><div>REDUCE VIOLENCE EVERYWHERE</div></div> <div><div>TARGET 16-2</div><div></div><div>PROTECT CHILDREN FROM ABUSE, EXPLOITATION, TRAFFICKING AND VIOLENCE</div></div> <div><div>TARGET 16-5</div><div></div><div>SUBSTANTIALLY REDUCE CORRUPTION AND BRIBERY</div></div> <div><div>TARGET 16-7</div><div></div><div>ENSURE RESPONSIVE, INCLUSIVE AND REPRESENTATIVE DECISION-MAKING</div></div> <tr><td></td><td><ul style="list-style-type: none"><li>▪ We identify and take action against corruption and violence across all Group activities and its value chain.</li><li>▪ We take action against corruption and violence by implementing reporting and whistleblowing policies, as well as anti-bribery and anti-corruption measures, throughout the Group and across the value chain.</li></ul></td><td><ul style="list-style-type: none"><li>▪ We implement a <b>Compliance Management System</b>.</li><li>▪ Implement a <b>Diversity, Equity &amp; Inclusion Policy</b>.</li><li>▪ Implement a <b>Policy for the Prevention and Combatting of Workplace Harassment</b>.</li><li>▪ <b>Zero</b> confirmed incidents of corruption or anti-competitive behavior.</li><li>▪ <b>Zero</b> confirmed incidents of corruption.</li><li>▪ <b>Zero</b> confirmed incidents of bribery.</li><li>▪ <b>Zero</b> confirmed incidents of conflict of interest</li></ul></td></tr> <tr><td><div><div>17</div><div>PARTNERSHIPS FOR THE GOALS</div><div></div></div></td><td><div><div>TARGET 17-16</div><div></div><div>ENHANCE THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT</div></div><div><div>TARGET 17-17</div><div></div><div>ENCOURAGE EFFECTIVE PARTNERSHIPS</div></div><tr><td></td><td><ul style="list-style-type: none"><li>▪ We participate in strong global partnerships aimed at the development and promotion of new and existing technologies, knowledge, and business models related to sustainable development.</li></ul></td><td><ul style="list-style-type: none"><li>▪ We are an <b>active member of several organizations and networks</b> (SEV Council for Sustainable Development, Greek Network for Corporate Social Responsibility – CSR Hellas, UN Global Compact), with which we collaborate to support initiatives that promote the achievement of the Sustainable Development Goals.</li></ul></td></tr></td></tr>		<ul style="list-style-type: none"><li>▪ We identify and take action against corruption and violence across all Group activities and its value chain.</li><li>▪ We take action against corruption and violence by implementing reporting and whistleblowing policies, as well as anti-bribery and anti-corruption measures, throughout the Group and across the value chain.</li></ul>	<ul style="list-style-type: none"><li>▪ We implement a <b>Compliance Management System</b>.</li><li>▪ Implement a <b>Diversity, Equity &amp; Inclusion Policy</b>.</li><li>▪ Implement a <b>Policy for the Prevention and Combatting of Workplace Harassment</b>.</li><li>▪ <b>Zero</b> confirmed incidents of corruption or anti-competitive behavior.</li><li>▪ <b>Zero</b> confirmed incidents of corruption.</li><li>▪ <b>Zero</b> confirmed incidents of bribery.</li><li>▪ <b>Zero</b> confirmed incidents of conflict of interest</li></ul>	<div><div>17</div><div>PARTNERSHIPS FOR THE GOALS</div><div></div></div>	<div><div>TARGET 17-16</div><div></div><div>ENHANCE THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT</div></div> <div><div>TARGET 17-17</div><div></div><div>ENCOURAGE EFFECTIVE PARTNERSHIPS</div></div> <tr><td></td><td><ul style="list-style-type: none"><li>▪ We participate in strong global partnerships aimed at the development and promotion of new and existing technologies, knowledge, and business models related to sustainable development.</li></ul></td><td><ul style="list-style-type: none"><li>▪ We are an <b>active member of several organizations and networks</b> (SEV Council for Sustainable Development, Greek Network for Corporate Social Responsibility – CSR Hellas, UN Global Compact), with which we collaborate to support initiatives that promote the achievement of the Sustainable Development Goals.</li></ul></td></tr>		<ul style="list-style-type: none"><li>▪ We participate in strong global partnerships aimed at the development and promotion of new and existing technologies, knowledge, and business models related to sustainable development.</li></ul>	<ul style="list-style-type: none"><li>▪ We are an <b>active member of several organizations and networks</b> (SEV Council for Sustainable Development, Greek Network for Corporate Social Responsibility – CSR Hellas, UN Global Compact), with which we collaborate to support initiatives that promote the achievement of the Sustainable Development Goals.</li></ul>
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 It concerns priority goals for the Group

## 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 2021, the Group developed its ESG strategy and the action plan for strategic priorities and goals. In 2022, the Group began implementing the action plan it had set. In 2023, due to the Group's transformation, the ESG strategy was revisited to align with its business activity. It is worth mentioning that the Group's new ESG strategy incorporates goals from the 'Forward Faster' initiative of the UN Global Compact, which aims to increase accountability and transparency, urging companies to publicly declare their commitments and highlight the actions they will take to achieve the Sustainable Development Goals (SDGs). The new ESG Strategy is systematically monitored by the Group's Strategy Development Division and the ESG Strategy & Sustainable Development Division, in collaboration with the Heads of the relevant departments. The Sustainable Development Committee is regularly updated on its progress.































The Group's main strategic priorities, individual goals, and their progress are detailed below, while the specific action plans are developed in the relevant sections.

<div>Climate Change and Circular Economy</div>						
Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable Development Goals
				Base year	2023	
Climate change	Energy transition and air emissions management Climate change	<ul style="list-style-type: none"><li>Reduce energy consumption from non-renewable sources by 10% by 2030</li></ul>		2023	New Target	 
		<ul style="list-style-type: none"><li>Reduce Scope 1 and 2 emissions by 42% by 2030</li></ul>		2023	New Target	
		<ul style="list-style-type: none"><li>2050 zero greenhouse gas emissions</li></ul>		2023		
		<ul style="list-style-type: none"><li>Reduce indirect emissions (Scope 3) by 25% by 2030</li></ul>		2023	New Target	
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"><li>80% waste diverted* from landfill</li></ul>		2021		   
		<ul style="list-style-type: none"><li>90% waste diverted* from landfill</li></ul>		2021		
		<ul style="list-style-type: none"><li>100% waste diverted* from landfill</li></ul>		2021		
		<p><i>* Waste resulting from the operation of the Group's projects</i></p> <ul style="list-style-type: none"><li>15% reduction in water withdrawal by 2030</li></ul>		2021	New Target	
Managing Climate Risks	Energy transition and air emissions management	<ul style="list-style-type: none"><li>Identification and mitigation of climate risks with the aim of enhancing resilience and adaptivity</li></ul>		2021		 
Protection and conservation of biodiversity	Protect and conserve biodiversity and ecosystems	<ul style="list-style-type: none"><li>Implementation of biodiversity conservation management plans in 100% of projects, within or near environmentally sensitive areas</li></ul>		2022		 

 Short-term Goals: the period adopted by the company as the reference period in its financial statements

 Medium-term Goals: up to 5 years

 Long-term Goals: more than 5 years

<div>Employee Health, Safety and Development</div>						
Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable De-velopment Goals
				Base year	2023	
Strengthening Health & Safety culture to achieve zero accidents	Employees' and business partners' health, safety and well-being	<ul style="list-style-type: none"><li>10 hours on average of training per employee on Health &amp; Safety and well-being</li></ul>		2021		 
		<ul style="list-style-type: none"><li>Training on Health &amp; Safety and well-being for the Group's critical business partners</li></ul>		2023	New Target	
		<ul style="list-style-type: none"><li>Zero fatal and high-consequence work-related injuries</li></ul>		2022		
Well-being	Employment practices, training and development Employees' and business partners' health, safety and well-being	<ul style="list-style-type: none"><li>Enhancing employees' engagement</li></ul>		2019		    
		<ul style="list-style-type: none"><li>Participation of 100% of employees in well-being programs</li></ul>		2022		
		<ul style="list-style-type: none"><li>100% of employees will be paid a living wage for a decent living by 2030</li></ul>		2023	New Target	
Enhancing diversity	Equitable and inclusive working environment and human rights	<ul style="list-style-type: none"><li>Equal representation, participation, and leadership at all levels of management by 2030</li></ul>		2023	New Target	   
		<ul style="list-style-type: none"><li>Equal pay for equal work by 2030</li></ul>		2023	New Target	
Training & Evaluation	Employment practices, training and development	<ul style="list-style-type: none"><li>Training of all employees on key thematic areas</li></ul>		2021		
		<ul style="list-style-type: none"><li>Maintaining an average of over 25 hours of training per employee</li></ul>		2021		
		<ul style="list-style-type: none"><li>Evaluation of 100% of employees* on an annual basis</li></ul>		2023	New Target	
* based on eligibility criteria						

 Short-term Goals: the period adopted by the company as the reference period in its financial statements

 Medium-term Goals: up to 5 years

 Long-term Goals: more than 5 years





Social Responsibility

Strategic priority	Group's Material Topics	Targets	Time frame	Progress		Sustainable Development Goals
				Base year	2023	
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"><li>Consultation with the local community in 100% of new projects and response to their needs</li></ul>	▲	2022	●	
Strengthening volunteering	Care for the prosperity of local communities	<ul style="list-style-type: none"><li>Participation of 100% of employees* in Group's voluntary actions</li></ul> <p><small>* The indicator refers to employees who expressed their intention to participate in volunteering</small></p>	▲▲	2022	●	  
Constructive collaboration with stakeholders	Care for the prosperity of local communities	<ul style="list-style-type: none"><li>Enhancing stakeholder engagement</li></ul>	▲▲	2021	●	
Ensuring projects' quality and safety	Infrastructure safety and user experience	<ul style="list-style-type: none"><li>Conduct 100% customer satisfaction survey</li></ul>	▲▲	2023	New Target	 
		<ul style="list-style-type: none"><li>Zero non-compliances regarding quality issues</li></ul>	▲	2021	●	



Integrity and Business Ethics

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"><li>Cooperation only with business partners that meet the ESG criteria set by the Group</li></ul>	▲▲	2022	●	
Strengthening the Anti-Bribery System	Compliance, integrity and business ethics	<ul style="list-style-type: none"><li>Zero confirmed cases of bribery</li></ul>	▲	2022	●	

▲ Short-term Goals: the period adopted by the company as the reference period in its financial statements

▲▲ Medium-term Goals: up to 5 years

▲▲▲ Long-term Goals: more than 5 years



Integrity and Business Ethics

Strengthening the Group's Integrity Framework and shielding processes to maintain zero confirmed incidents of corruption	Compliance, integrity and business ethics	Zero confirmed incidents of corruption	▲	2022	●	
Optimal Corporate Governance	Compliance, integrity and business ethics Business continuity and emergency preparedness	Certification and maintenance of a Corporate Governance System according to ISO/ IEC 37000:2021	▲	2021	●	
		Certification and maintenance of a Business Continuity Management System according to ISO 22301:2019	▲	2022	●	



Innovation and Digital Transformation

Digital Transformation	Reinforcement of innovation, research and digital transformation	100% of employees have basic digital skills by 2030	▲▲▲	2023	New Target	  
		Use of digital transformation tools: cloud computing services and artificial intelligence (AI)	▲▲	2022	●	
Operations' optimization and development of products and services	Reinforcement of innovation, research and digital transformation	Participation in at least 2 proposals per year for funded research projects	▲	2022	●	

▲ Short-term Goals: the period adopted by the company as the reference period in its financial statements

▲▲ Medium-term Goals: up to 5 years

▲▲▲ Long-term Goals: more than 5 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)
	American-Hellenic Chamber of Commerce







ESG PERFORMANCE BY EXTERNAL RATING AGENCIES

ELLAKTOR Group responds to inquiries from sustainable development analysts, and its performance is evaluated by independent organizations such as ISS ESG, Bloomberg, S&P, LSEG, Sustainable Fitch, FTSE Russell, and Sustainalytics. In May 2023, ELLAKTOR was included in the MSCI.

ESG PERFORMANCE			
Rating agency	Rating		Rating Scale (low-high)
	2023	2022	
	Environment: <b>2</b> Social: <b>1</b> Governance: <b>6</b>	Environment: <b>2</b> Social: <b>2</b> Governance: <b>4</b>	10 - 1
Bloomberg	73.1	69.9	0 - 100
	79	80	0 - 100
	29.3	29.8	100 - 0
Corporate Knights	40.4	57.25	0 - 100
S&P Global	45	40	0 - 100
	3.7	3.6	0 - 5



GROUP'S PERFORMANCE IN ESG

	The Company is included in the ATHEX ESG Index of the Athens Stock Exchange. This specific index monitors the stock market performance of listed companies on the Athens Stock Exchange that adopt and promote their practices in environmental, social, and governance (ESG) matters. It is worth noting that in 2023, the Group achieved a 95% score on the “ESG Transparency Score” of ATHEX.
 FTSE4Good	The Group remained included in the Financial Times Stock Exchange4Good (FTSE4Good), Sustainability Index Series.
	ELLAKTOR participates in the evaluation of the Bloomberg Gender Equality Index (GEI), achieving in 2023 a score higher than the inclusion threshold.
	The Group submitted a report for the first time to the independent certification organization (CDP) for evaluation across 13 disclosure areas related to climate change, achieving a high score of B (global average: C).
	ELLAKTOR Group was ranked among the top 100 companies in Greece and was awarded the Platinum distinction in the recent “ESG Transparency Index” presented by Forbes. The score reflects the current state of the 100 largest companies in Greece (based on 2021 reported turnover) in terms of transparency on ESG matters.
	ELLAKTOR Group was included for the first time in the national list of “The 50 Most Sustainable Companies in Greece” for 2024 by the QualityNet Foundation.

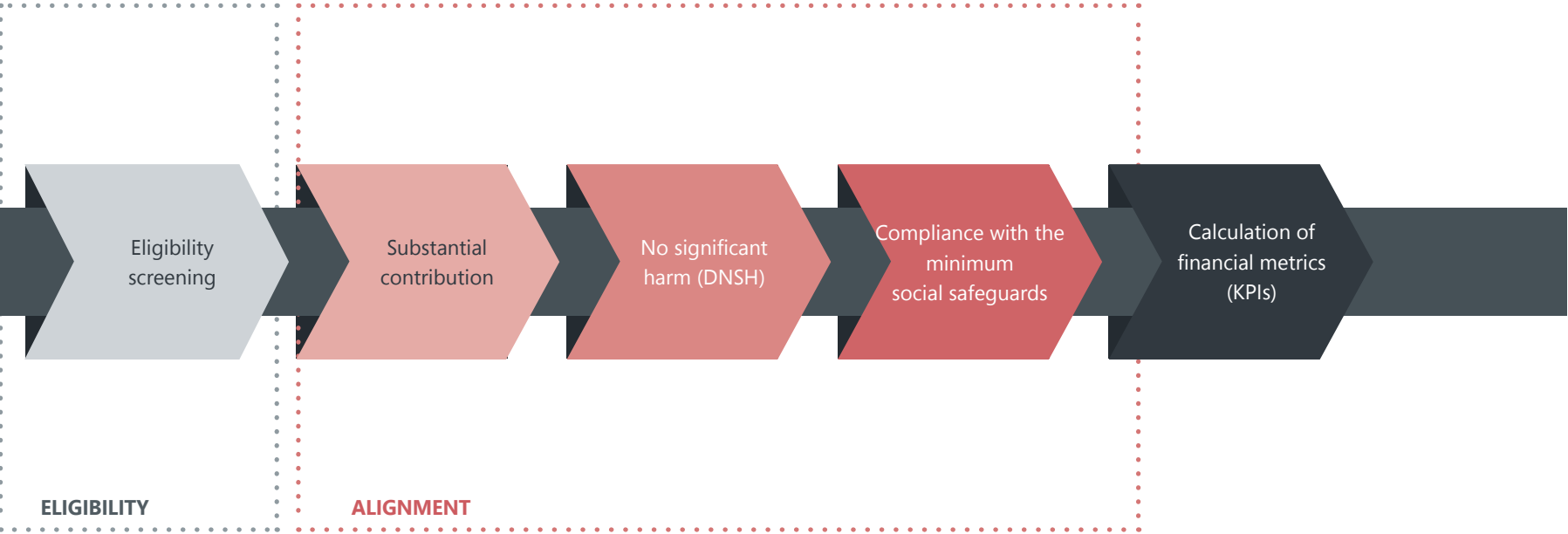
Disclosures according to EU Taxonomy

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 third 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.

ELLAKTOR Group proceeded to the screening of environmentally sustainable activities, following the guidelines of Regulations 2020/852/EU, 2021/2178/EU, 2021/2139/EU, 2023/2485/EU, and 2023/2486/EU, related to Climate, by adopting a five-step assessment methodology as follows:

Methodology for evaluating the Group's business activities



Taxonomy Eligibility Screening

In accordance with the Regulation, the eligibility of an economic activity is as-sessed by determining whether it is included in the EU Taxonomy and whether it can contribute to achieving one or more of the following six environmental objectives:

- 1. Climate Change Mitigation (CCM)
- 2. Climate Change Adaptation (CCA)
- 3. Sustainable use and protection of Water and Marine Resources (WTR)
- 4. Transition to a Circular Economy (CE)
- 5. Pollution Prevention and Control (PPC)
- 6. Protection and restoration of Biodiversity and ecosystems (BIO)

In this context, ELLAKTOR Group implemented the guidelines of the Regula-tion and the Delegated Act on Climate, as well as their relevant amendments, and identified the economic activities considered eligible based on the eligi-bility definition of Taxonomy.

It is noted that non-eligible activities include those activities that are not cov-ered by the Climate Delegated Act.

Regarding the identification of eligible activities related to all six environmen-tal objectives, the analysis and evaluation of the Group's business activities were conducted based on their nature and the relevant NACE codes.

Based on the relevant Delegated Acts, the Group has identified a total of 23 continuing economic activities as eligible within the framework of ten (10) economic activities defined in the EU Taxonomy, which can contribute to the objectives of CCM, CCA, CE and PPC.



European Taxonomy

Guidelines of Regulations 2020/852/EU, 2021/2178/EU, 2021/2139/EU, 2023/2485/EU, and 2023/2486/EU, on Climate

ELIGIBLE ACTIVITIES

ELLAKTOR

- ▶ Electricity generation using solar photovoltaic technology

CONCESSIONS

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

ENVIRONMENT

- ▶ Hazardous waste treatment
- ▶ Sorting and material recovery from non-hazardous waste
- ▶ Electricity generation from wind power
- ▶ Composting of organic waste
- ▶ Landfill gas capture and utilization
- ▶ Collection and transport of hazardous waste

REAL ESTATE DEVELOPMENT AND SERVICES

- ▶ Acquisition and ownership of buildings

CONSTRUCTION – DISCONTINUED OPERATIONS

- ▶ Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event
- ▶ Electricity generation using solar photovoltaic technology
- ▶ Installation, maintenance and repair of energy efficiency equipment



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 one or more of the six environmental objectives.

An economic activity is characterized as environmentally sustainable, meaning aligned with the 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.

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

According to Article 17 of Regulation 2020/852/EU, with regard to the criteria for Do No Significant Harm (DNSH) on the other environmental objectives, the environmental impacts of both the activity itself and the environmental impacts of the products and services resulting from this activity throughout their entire life cycle are taken into account. Specifically, with respect to the DNSH criteria for the environmental objective of climate change adaptation,

these are detailed in the [«TCFD Report Results»](#) section of the chapter «E - Environment.»

*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

Guidelines of Regulations 2020/852/EU, 2021/2178/EU, 2021/2139/EU, 2023/2485/EU, and 2023/2486/EU, on Climate

ALIGNED ACTIVITIES

ELLAKTOR

- ▶ Electricity generation using solar photovoltaic technology

CONCESSIONS

- ▶ Infrastructure for water transport

ENVIRONMENT

- ▶ Hazardous waste treatment
- ▶ Sorting and material recovery from non-hazardous waste
- ▶ Electricity generation from wind power
- ▶ Composting of organic waste
- ▶ Landfill gas capture and utilization

The key performance indicators (“KPIs”) include the turnover KPI, CapEx KPI, and OpEx KPI. For the presentation of these KPIs, the templates provided in Annex II of the Commission Delegated Regulation were used. ELLAKTOR Group does not engage in any activities related to nuclear energy (activities 4.26-4.31), and therefore the specific templates introduced by the Complementary Delegated Act concerning activities in certain energy sectors were not applied.

The 23 continuing economic activities were evaluated against the requirements of the technical screening criteria and the Do No Significant Harm (DNSH) criteria, and 14 of them were classified as aligned within the framework of seven (7) economic activities defined in the EU Taxonomy.

It is noted that for the alignment assessment with the Taxonomy of discontinued economic activities in the Construction segment, sufficient data was not available, resulting in assumptions being made during the evaluation of the technical and DNSH criteria.

More detailed information on the screening of these criteria is presented below:

#### 4.1. *Electricity generation using solar photovoltaic technology*

The company «IOANNA PROPERTIES SRL», a subsidiary of ELLAKTOR, operates a photovoltaic park for electricity generation in Romania using photovoltaic solar technology, meeting the technical criteria for significant contribution to climate change mitigation. Regarding the criteria for avoiding significant adverse impacts, the following apply: a) for climate change adaptation, see more detailed information in the «TCFD Report Results» section of the «Environment» chapter, b) for transitioning to a circular economy, the availability and, where feasible, use of equipment and construction elements with high durability and recyclability are evaluated, which can be easily disassembled and refurbished, c) for the protection and restoration of biodiversity and ecosystems, an environmental impact assessment has been completed for the project and required mitigation and compensation measures are implemented to protect the environment.

#### 4.3. *Electricity generation from wind technology*

The subsidiary company “Aeiforiki Dodekanisou S.A.” of HELECTOR, operates three wind parks in Rhodes, Kos, and Patmos, where electricity is generated from wind energy, meeting the technical criteria for significant contribution to climate change mitigation. Regarding the criteria for avoiding significant adverse impacts, the following apply: a) for climate change adaptation, see more detailed information in the «TCFD Report Results» section of the «E-Environment» chapter, b) for transitioning to a circular economy, equipment and construction elements with high durability and recyclability are used, c) for the protection and restoration of biodiversity and ecosystems, the project has approved Standard Environmental Commitments and required mitigation and compensation measures are implemented to protect the environment.

#### 5.8. *Composting of bio-waste*

The project “J/V PRASINOU EMA” concerns the processing of separate collected organic waste through composting (aerobic digestion), and the subsequent production and use of compost. Regarding the technical criteria for

assessing the contribution to the objective of mitigating climate change, the organic waste composted is separated at the source and collected separately, and the resulting compost belongs to the project’s entity, E.D.S.N.A., meeting the requirements for the materials used for fertilization as defined in category 3 of Annex II of Regulation (EU) 2019/1009.

Regarding the criteria for no significant harm the following apply: a) for adaptation to climate change, refer to the «TCFD Report Results» section of the «E-Environment» chapter for detailed information, b) for pollution prevention and control, the unit processes more than 400 tons per day, emissions into the atmosphere and water are within or below emission levels associated with best available techniques, as defined for aerobic waste treatment in the most recent relevant best available techniques conclusions (BACT). Additionally, the unit has a system to prevent leachate leakage into groundwater, c) for the protection and restoration of biodiversity and ecosystems, the project has an approved Environmental Impact Assessment and a Decision on the Approval of Environmental Conditions, and required mitigation and compensation measures are implemented to protect the environment

#### 5.10. *Landfill gas capture and utilization*

The 4 biogas utilization units of HELECTOR, «Operation of Tagarades Biogas Unit», «Operation of Mavrorachi Biogas Energy Utilization Unit», «BEAL», and «Biogas of Western Macedonia», operate based on the capture and utilization of methane from landfills in permanently closed areas and closed cells, using special technical facilities and equipment that have been installed during or after the closure of the landfills or cells of the sanitary landfills.

Regarding the technical criteria for significant contribution to climate change mitigation, the following apply to the aforementioned projects: a) The landfill has not opened after July 8, 2020, b) The landfill cell where the gas capture system is installed for the first time, expanded, or reconstructed has been permanently closed and does not accept further biodegradable waste, c) The generated landfill gases are used for electricity production as biogas, and d) Methane emissions from the landfill and leaks from the gas collection and utilization facilities are subject to control and monitoring procedures defined in Annex III of Council Directive 1999/31/EC.

Regarding the criteria for no significant harm, the following apply: a) for adaptation to climate change, refer to the detailed information in the «TCFD Report Results» section of the «E-Environment» chapter b) for pollution prevention and control, the final cessation of operations and the rehabilitation, as well as the subsequent care of old landfill sites where the landfill gas capture system is installed, are carried out in accordance with the general requirements specified in Annex I of Directive 1999/31/EC and the monitoring and control procedures outlined

in Annex III of the said directive and c) for the protection and restoration of biodiversity and ecosystems, the projects have an approved Environmental Impact Assessment and a Decision on the Approval of Environmental Conditions, and the necessary mitigation and compensation measures are implemented to protect the environment.

#### 2.7. *Sorting and material recovery from non-hazardous waste*

The projects «ASA (Aspropyrgos)» and «ASA (Thessaloniki)» involve the operation of facilities for sorting and recovering non-hazardous waste flows, specifically recyclable glass waste, into high quality secondary raw materials using mechanical conversion processes. Similarly, the project «ASA (RSC Lamia)» involves the operation of facilities for sorting and recovering of non-hazardous waste flows, specifically recyclable waste (blue bins), into high-quality secondary raw materials using mechanical conversion processes.

Regarding the technical criteria for significant contribution to circular economy, the following apply to the aforementioned projects: a) for the sourcing of raw materials, non-hazardous waste primary materials come from separately collected and transported waste (glass collection bins and blue bins), b) for material recovery, the operations involve achieving or exceeding the existing material recovery rates per unit by the competent authorities, which are defined in the applicable plans, permits, or waste management contracts. The facilities internally apply predefined Key Performance Indicators (KPIs) to monitor performance and achieve the applicable material recovery rates.



Regarding materials for which separate collection is mandatory, at least 50% of the processed, separately collected, non-hazardous waste is converted into secondary raw materials suitable for substituting primary raw materials in production processes. It's worth noting that for all three units, the recycling rate of recyclable waste exceeds 60% c) for proper waste management, facilities implement best available practices to improve the overall environmental performance of the units, such as waste designation processes and waste acceptance procedures concerning the quality of incoming waste, traceability and waste registration systems, waste separation processes, measures to ensure waste compatibility before mixing or blending, technologies and procedures for material sorting and recovery, in order to meet the relevant technical specifications and quality standards and technologies appropriate to the waste fractions, including optical sorting, magnetic separation, or size-based separation and d) for the quality of secondary raw materials, waste is converted into secondary raw materials, including critical raw materials, suitable for substituting primary raw materials in production processes (recyclable materials and glass cullet accordingly).

Regarding the criteria for no significant harm, the following apply: a) for adaptation to climate change, please refer to the section «[TCFD Report Results](#)» in Chapter «E-Environment» for more detailed information, b) for sustainable use and protection of water and marine resources, the projects have an approved Environmental Impact Assessment Study and a Decision on the Approval of Environmental Conditions, and necessary measures for mitigation and compensation are implemented to protect the environment, c) for prevention and control of pollution, relevant techniques are applied to prevent and control pollution, and the relevant emission limits of the Best Available Techniques (BAT) conclusions for waste processing are met, and d) for the protection and restoration of biodiversity and ecosystems, the projects have an approved Environmental Impact Assessment Study and a Decision on the Approval of Environmental Conditions, and necessary measures for mitigation and compensation are implemented to protect the environment.

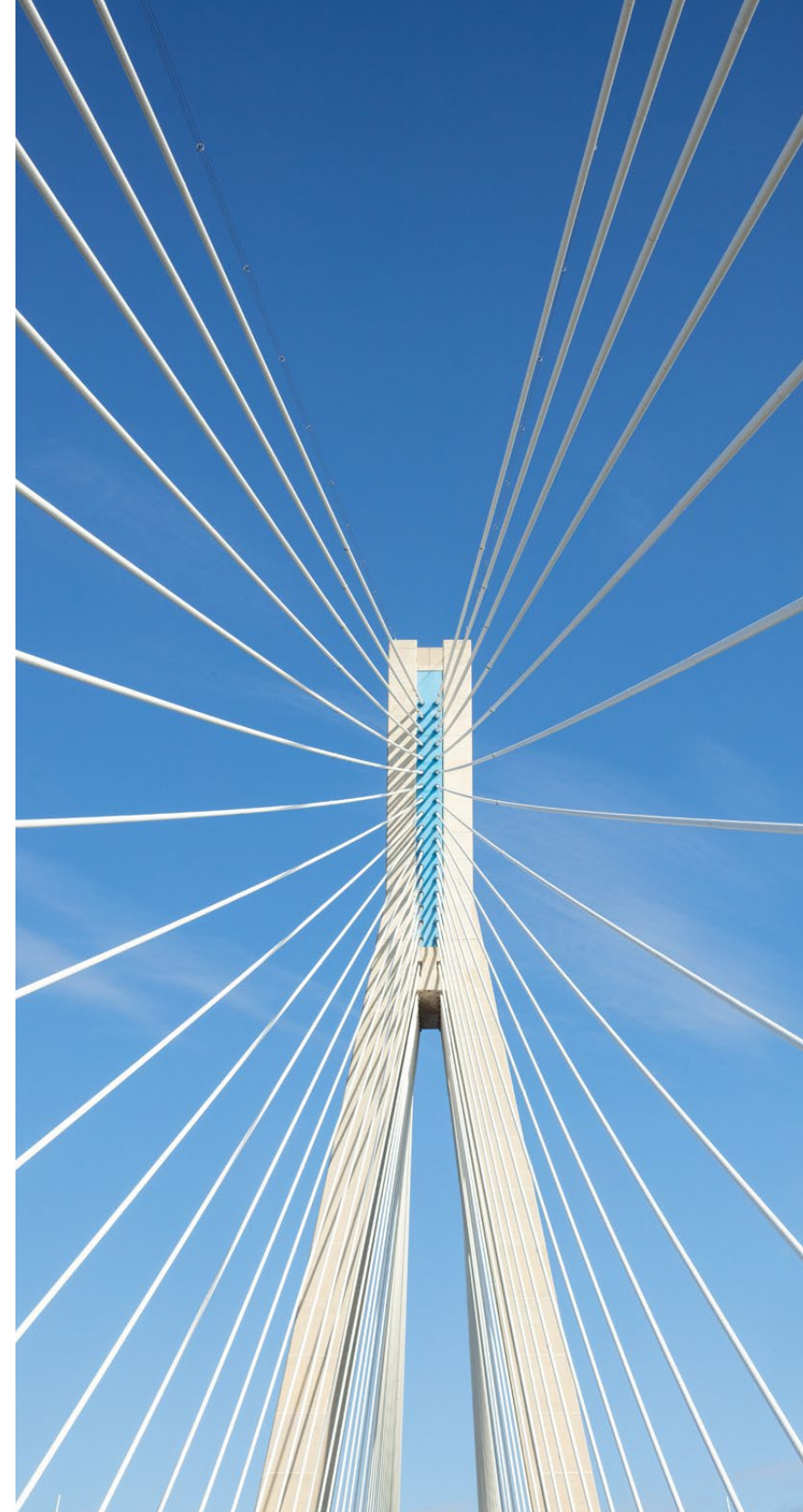
## 2.2. *Hazardous waste management*

The project "Sterilisation S.A." involves the operation of specialized facilities for the treatment of hazardous waste from healthcare units, including physicochemical treatment and specifically sterilization (task D9), and the project «EPALTHEA» involves the operation of specialized facilities for the treatment of hazardous waste from healthcare units, including the incineration of non-recyclable hazardous waste (task D10).

Regarding the monitor of technical criteria for significant harm to pollution prevention and monitor for projects, the following apply: a) operations related to the sterilization of healthcare waste and the incineration of waste of healthcare units comply with the requirements set forth in the conclusions for Best Available Techniques (BAT) for waste treatment, b) during the pre-acceptance procedures, requirements are applied in accordance with Joint Ministerial Decision 146163/08.05.2012 «Measures and Terms for the Management of Healthcare Waste», and necessary information is collected such as the arrival date at the waste processing unit, contact details of the waste producer, waste code, c) during the acceptance procedures, requirements are applied according to Joint Ministerial Decision 146163/08.05.2012 «Measures and Terms for the Waste Management of Healthcare Units» and the Decision on the Approval of Environmental Conditions of the units. Personnel involved in the pre-acceptance and acceptance procedures are able to handle all necessary issues concerning waste processing at the waste treatment facility. As for the «mixing or blending activities» of Directive 2010/75/EU, the projects do not use dilution to reduce the concentration of one or more hazardous substances contained in the waste, aiming to

be declassified the resulting waste mixture and convert it to «non-hazardous waste,» and therefore be treated in facilities not specifically intended for hazardous waste treatment. Dilution is not used as a «substitute» for appropriate waste treatment d) regarding the treatment of healthcare waste through sterilization and incineration methods, the facilities implement best practices for the safe management of waste from healthcare activities and comply with legal obligations such as Ministerial Decision 36060/1155/e.103/2013 «Determination of framework of rules, measures, and procedures for the integrated prevention and control of environmental pollution from industrial activities, in compliance with the provisions of Directive 2010/75/EU "on industrial emissions (integrated prevention and control of pollution)" of the European Parliament and of the Council of 24 November 2010".

Regarding the criteria of non-significant harm, the following apply: a) for adaptation to climate change, refer to the «[TCFD Report Results](#)» section of the «E-Environment» chapter for more details, b) for sustainable use and protection of water and marine resources, projects have an approved Environmental Impact Assessment and a Decision on the Approval of Environmental Conditions, the required mitigation and compensation measures for environmental protection and relevant techniques for water and marine resource protection applied, as defined in the conclusions of the best available techniques (BAT) for waste treatment, and c) for the protection and restoration of biodiversity and ecosystems, projects have an approved Environmental Impact Assessment and a Decision on the Approval of Environmental Conditions, with the required mitigation and compensation measures are applied for environmental protection.



6.16. *Infrastructure for water transport*

The «Development of New Alimos Marina», a subsidiary of AKTOR CONCESSIONS, operates as a tourist port in the region of Attica. Regarding the technical criteria for significant contribution to climate change adaptation for the Alimos Marina project, the following natural hazards have been identified and evaluated: humidity, heatwaves, cold waves/frost, rainfall/snowfall, floods, and fires. To assess climate risks and vulnerability in proportion to the scale and expected duration of the activity, two of the Representative Concentration Pathways (RCPs) scenarios of the Intergovernmental Panel on Climate Change (IPCC, AR5) have been used: the moderate scenario RCP4.5, which aligns with the Paris Agreement, and the high-emissions scenario RCP8.5. Specifically, the vulnerability assessment was conducted by combining the results of the analysis of expected climate parameters that are expected to affect the operating location of Alimos Marina by 2050 (Exposure Analysis), as well as the identification of activities susceptible to any climate change, regardless of geographical location (Sensitivity Analysis). The estimation of climate risk was performed through the assessment of the probability and severity of impacts associated with the risks identified as significant in the vulnerability assessment, the assessment of the significance of the identified potential risks, and the identification of adaptation measures to address potentially significant risks. In the case of Alimos Marina, the risk was found to be low in all parameters, and no adaptation measures have been proposed. The assessment was conducted based on the guidelines of European Commission Notice 2021/C 280/01 concerning technical guidance for conducting sustainability audit.

The criteria of no significant harm are as follows: a) for climate change mitigation, the project operates as a tourist port (marina) and does not have new facilities, nor have large-scale renovations been carried out, b) for sustainable use and protection of water and marine resources, the project has approved environmental terms, as well as an Environmental Impact Assessment, and conducts regular water quality checks in terms of physicochemical parameters, microbiological load, and nutrients, c) for the transition to a circular economy, no construction or demolition projects are carried out, d) for the prevention and control of pollution, the approved environmental conditions are observed and measures are taken to reduce noise, dust

and pollutant emissions in the project area, as well as winterization and e) for the protection and restoration of biodiversity and ecosystems, the project has an approved Environmental Impact Assessment and approved environmental conditions, and the required mitigation and compensation measures are implemented to protect the environment.

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 account, which are referred to in Regulation (EU) 2021/2178 as Key Performance Indicators (KPIs). Specifically, the percentages on the annual turnover from sales of products and services, capital expenditure (CapEx) and operational expenditure (OpEx) are presented. These percentages correspond to the financial activities of the Group that were considered non-eligible, eligible and non-aligned or aligned for EU Taxonomy Regulation purposes, according to the description of these activities and taking into account their associated NACE codes, as well as the relevant technical audit criteria as listed in Delegated Regulations 2021/2139/EU, 2022/1214/EU, 2023/2486/EU and 2023/2485/EU. The Group's economic activities were reviewed and included/excluded both on the basis of eligibility and their alignment with the technical audit criteria provided in the relevant delegated regulations. This evaluation is presented in detail for each aligned activity, while the activities that were considered not meeting one or more of the technical criteria are presented on the basis of eligibility in this report.

Taking the above into account, the following financial information of the Group was used for the calculation of the KPIs:

KPI RELATED TO TURNOVER (Turnover) (%)

The percentage of sales in accordance with the Complementary Climate Delegated Act is calculated as part of the net turnover derived from products or services, linked to economic activities eligible or aligned with the Taxonomy Regulation (numerator), divided by the net turnover of the Group (denominator). The denominator is based on consolidated sales, in accordance with International Accounting Standard (IAS) 1 "Presentation of Financial Statements". Specifically, the total sales of the Group are reflected in the line "Sales" in the Group's Annual Financial Statements, in the Income Statement and amount to €808.46 million (€387.46 million from Continuing and €421.01 million from Discontinued operations).

It is noted that the amounts of Sales, both in the numerator and in the denominator, have been calculated after the elimination of intragroup transactions.

In the column «% of Turnover (4)» of the table «Turnover», the proportion of sales for each activity, whether it is Taxonomy-aligned or Taxonomy-eligible, to the total sales of the Group is presented.

KPI RELATED TO CAPITAL EXPENDITURE (CapEx) (%)

The percentage of capital expenditure (CapEx) was calculated based on additions to tangible assets, intangible assets and investment properties during 2023 before depreciation and any remeasurements, including those resulting from revaluations and impairments for 2023 and excluding fair value changes and also any possible additions to tangible assets, intangible assets and investment properties resulting from business combinations (denominator).

The numerator equals to the part of the capital expenditure included in the denominator that is any of the following, as set out 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 allow Taxonomy-eligible economic activities to become Taxonomy-aligned ('CapEx plan') under the following conditions: (a) the project aims either to expand the taxonomy-aligned economic activities of the enterprise or to upgrade the taxonomy-eligible economic activities to become taxonomy-aligned within a period of five weeks, and (b) the plan shall be disclosed at economic activity aggregated level and be approved by the management body of non-financial undertakings



- 3. related to the purchase of output from Taxonomy-aligned economic activities and individual measures enabling the target activities to become low-carbon or to lead to greenhouse gas reductions.

The total capital expenditure is reflected in the table “Investments in tangible and intangible assets, and investment property” of note “5. Segment reporting” of the Annual Consolidated Financial Statements, where there is an analysis of these amounts by business sector of the Group. Specifically, the capital expenditures amount to €12.42 million (€9.23 million from Continuing and €3.18 million of Discontinued operations). Additionally, the capital expenditure aligns with the line “Additions” in notes “7a Property, plant and equipment”, “8. Intangible assets & concession rights” and “9. Investments in property”. Furthermore, in the line “Purchase of tangible and intangible fixed assets and investments in real estate” in the “Cash Flow Statement” the amount of Capex related to Continuing operations is reported.

It should be noted that the amounts of capital expenditures, both in the numerator and in the denominator, have been calculated after eliminating intra-group transactions.

In the column “% of capital expenditure (4)” of the table “Capital expenditure”, the proportion of capital expenditure for each activity, whether Taxonomy-aligned or Taxonomy-eligible, to the total capital expenditures of the Group, is presented.

KPI RELATED TO OPERATING EXPENDITURE (OpEx) (%)

The percentage of annual operating expenditure (OpEx) was calculated based on direct non-capitalised costs related to building renovation activities, short-term leasing, maintenance and repair, as well as any other direct costs related to the daily maintenance of tangible assets by the company or a third party to whom the activities necessary to ensure the continuous and efficient operation of these assets are assigned (denominator). The numerator is equal 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 econom-

ic activities, including training and other human resources adaptation needs, and direct non-capitalised costs that represent research and development

- 2. part of the CapEx plan to expand Taxonomy-aligned economic activities or allow Taxonomy-eligible economic activities to become Taxonomy-aligned within a predefined 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 such measures are implemented and operational within 18 months.

The relevant expenses for the Group are included under the lines ‘Cost of goods sold’, ‘Administrative expenses’ and ‘Distribution expenses’ in the Group’s Annual Consolidated Financial Statements. More specifically, they are reflected in the line ‘Expenses for repair and maintenance of property, plant and equipment’ in Note “31 Expenses per category” in the Annual Consolidated Financial Statements of 31 December 2023, amounting to €12.38 million (€8.93 million from Continuing and €3.45 million from Discontinued operations).

It is noted that the amounts of operating expenses, both in the numerator and denominator, have been calculated after the elimination of intra-group transactions.

The “% Operating expenditure (4)” column of the table “Operating expenditure” the ratio of Operating expenditure of each operation, whether is Taxonomy-aligned or Taxonomy-eligible, to the total operating expenditure of the Group, is presented.

When a financial activity significantly contributes to multiple environmental objectives, only the most rele-

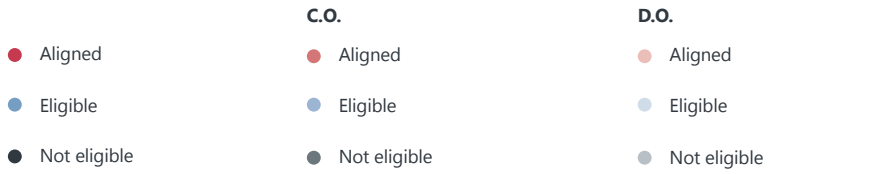
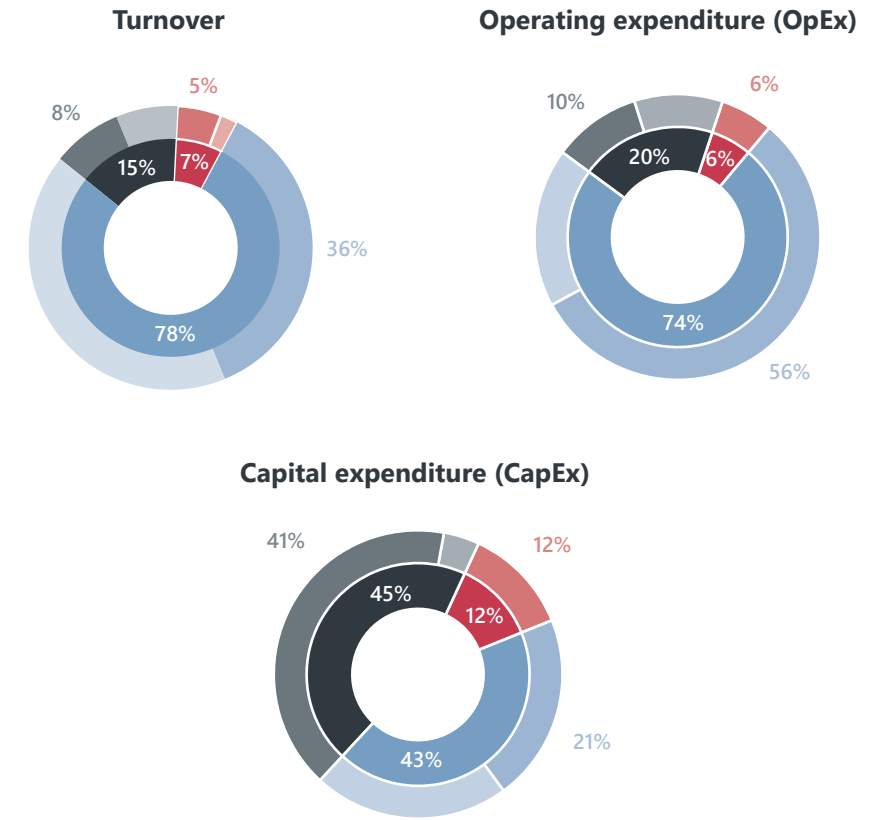
vant environmental objective is reported for calculating the KPIs to avoid double counting.

Additionally, there is a separate breakdown of the financial figures of Turnover, Capital, and Operating Expenditure, into Continuing and Discontinued Operations. For the year 2023, the Construction sector has been classified as Discontinued Operations according to the provisions of the IFRS 5 (note 6). For calculating the percentages of financial figures for Continuing Operations, only the Turnover, Capital, and Operating Expenditure exclusively related to Continuing Operations are used (as the denominator). Similarly, the percentages concerning Discontinued Operations are calculated. At the end of each table, the figures for the total activities of the Group are also provided.

It is noted that for comparability purposes, the percentages of Discontinued Operations for the year 2022 have been restated. Therefore, the percentages have been recalculated, considering as discontinued operations, apart from the Renewable Energy Sources sector, those of the Construction sector.

The detailed tables illustrating the percentages of eligible and non-eligible activities, according to the Taxonomy, including aligned and non-aligned activities by Turnover, Operating Expenses, and Capital Expenditures, are presented in the [Annex](#)

ASSESSMENT RESULTS OF ELIGIBILITY AND ALIGNMENT FOR THE TAXONOMY – 2023





# 02 Environment

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Protection of Biodiversity & Ecosystems

Alignment with the Sustainable Development Goals



Alignment with the Principles of the United Nations Global Compact







MAIN ACHIEVEMENTS



Continuation of the development of a Roadmap towards zero greenhouse gas emissions by 2050



Completion of identification and assessment of climate risks and their potential financial impacts in alignment with TCFD recommendations



Submission for the first time of a report for evaluation to the independent certification body (CDP) regarding climate change, achieving rating of B



Commitment to set near-term Group-wide emission reduction targets in line with the Science Based Targets initiative (SBTi)



Design and certification of Environmental & Energy Management Systems (ISO 14001 & 50001) for the New Alimos Marina Development Project

MATERIAL TOPICS

Energy transition and air emissions management

Climate change

Circular economy and waste management

Use of natural resources and raw materials

Water and effluents management

Biodiversity and ecosystems protection and preservation

OUR PERFORMANCE

223 GWh

of energy production from renewable energy sources (RES)

976 th. tonnes

of third parties CO<sub>2</sub> eq. emissions prevented

27%

reduction in Scope 1 & 2 emissions compared to 2021

97%

waste diverted from disposal from Group's operations

€778,311

spent on environmental protection

3,617

hours of training on environmental and energy issues with the participation of

816 th. tonnes

of third parties solid waste and

623 th. m<sup>3</sup>

of wastewater managed at treatment plants

1,026

employees



# Environmental Management

ELLAKTOR Group, recognizing its impact on the environment, has set as a primary goal and priority to manage effectively environment and minimizing potential environmental impacts from its business activities. By implementing best available practices and techniques and focusing on cultivating an environmentally and energy responsible corporate culture, the Group develops strategies for continuous improvement in its environmental performance.

Environmental protection, pollution prevention, promotion of the circular economy, achievement of zero greenhouse gas emissions, climate change mitigation and adaptation, protection and conservation of biodiversity and ecosystem, and responsible waste and raw materials management are core priorities across all Group activities. These priorities aim not only to reduce environmental impact but also to enhance the Group's positive impact on the environment.

## Environment & Energy Policy

The Group has adopted and implements an [Environment & Energy Policy](#), which aims not only to comply with the minimum obligations of environmental legislation but also to fulfill additional commitments by the Group's Management for an integrated environmental management system with key strategic pillars of climate change and circular economy. The main commitments of the Group's Management include the protection of the environment, including pollution prevention, ensuring the provision of necessary information and resources to achieve the objectives of the implemented Environmental & Energy Management Systems, consultation and open dialogue with stakeholders on environmental and energy issues and the continuous improvement of the Group's environmental and energy performance.

The main environmental impacts from all operations of the Group's companies are related to the consumption of resources (energy, water and materials), the emission of greenhouse gases and other air pollutants and the contribution to global warming, the production of liquid and solid hazard-

ous and non-hazardous waste, the possible impact on land and water recipients, the possible impact on biodiversity and ecosystems in the areas of activity and the environmental nuisances to the local community. In all projects and activities, from the construction stage to the restoration stage, but also during the operation and maintenance of the projects, the Group focuses on the protection of the environment and the minimization of the impact of its activities. 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 environment. Indicatively, the most important risks identified are those related to climate change, the possibility of non-timely compliance with environmental legislation or with the environmental permitting of a project, any incidents of pollution in a water recipient, emissions of air pollutants or dust beyond the limits, any waste leaks, any soil pollution, inefficient use of energy resources, increased water consumption with possible parallel pressure and change in the hydrological characteristics of water bodies. Other risks that have been identified are any nuisances to the local community, such as noise and vibrations above the limits, the possible reduction of the green balance, the possible disturbance of biodiversity, any complaints from stakeholders, the risks related to ensuring business continuity and preparedness to response to emergencies (e.g. pandemics, wars) and the change of

landscape features. In addition, risks may arise from the business partners selected by the Group and their environmental performance, not only directly when they are active in the Group's projects, but also indirectly affecting issues such as other indirect emissions (Scope 3). In particular, for the recognition of climate change risks, see the section «[Adaptation to climate change](#)».

To mitigate the environmental impacts of its activities and reduce its environmental risks, the Group is committed to the following areas, for which it develops action plans and incorporates relevant objectives into its strategy:

- implementation, operation and continuous improvement of certified Energy and Environmental Management Systems according to ISO 50001 and ISO 14001,
- adherence to an internal audit program on projects by certified internal auditors,
- application of best available techniques in terms of environmental protection,
- integrated energy management aimed at the rational use and saving of energy, through actions and control of energy consumption, with the main aim of reducing energy consumption from non-renewable sources,
- reduction of greenhouse gas and other air emissions,
- minimisation of waste, hazardous and non-hazardous, through the reduction of the waste produced, reuse to the maximum extent, recycling and the adoption of sorting practices at source, contributing to the promotion of 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 avoidance of deforestation,
- preserving and protecting biodiversity and ecosystems in the areas where it operates,
- effective management of nuisances such as noise, vibrations, traffic congestion, in order to reduce the impact on the local community, road traffic, public utility networks and protected areas,
- protection of antiquities and monuments of cultural heritage,
- aesthetic upgrade and harmonious integration of the spaces into the immediate and wider environment in which the projects are implemented,
- continuous information, training and awareness of employees on Environment & Energy Policy and environmental impacts, including employees of business partners,
- consultation with stakeholders and encouragement of employees to actively participate in the continuous improvement of the Group's environmental performance,



- implementation of contingency plans to reduce the environmental impact in the event of emergencies (waste leakage, flood, fire),
  - reducing the environmental footprint of subcontractors in projects, through corrective actions when identifying deviations from internal audits and through the training of its employees,
  - assessment of its business partners for environmental risks,
- continuous monitoring of environmental performance and informing stakeholders on environmental and energy issues.

In particular, to address the risks deriving from climate change, see the section «[Adaptation to climate change](#)».

Environment & Energy Management Action Plan	
In order to achieve the targets (short, medium and/or long-term) that have been set in the Climate Change and the Circular Economy pillar, the Group has planned a series of actions for the coming years, 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	🔄
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 Information to the Local Community on Biodiversity Issues	●
Adoption and implementation of fleet renewal and replacement policy	🔄
Investigation and exploitation of RES projects to cover the Group's electricity consumption	🔄
Evaluation of business partners with environmental criteria	🔄
Support and training of local suppliers to reduce their emissions	🔄
Design and development of a water efficiency management system in accordance with the requirements of ISO 46001:2019	🔄
🔄 In progress    ● Completed	

Environmental and Energy Management System

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

The main companies of the Group's segments of activity implement certified Environmental Management Systems according to ISO 14001:2015 (85% of projects based on turnover), through which the reduction of the impact of their activity on the environment is achieved and adopt practices related to recycling, energy saving, effective water management, wastewater management and biodiversity protection. At the same time, the compliance of the Group's companies with the applicable environmental legislation is ensured.

Through the certified Environmental Management Systems, the systematic recording of environmental and energy indicators is achieved, in order to monitor performance and opportunities for its improvement, as well as to identify and integrate the needs and expectations of the stakeholders. At the same time, the awareness of employees on environmental and energy issues is promoted and the operation of the activities is harmoniously integrated into the wider natural and human environment.

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

Organizational Structure

The Sustainable Development Committee oversees all ESG action plans, in particular environmental and energy issues, and monitors the Group's environmental performance, aiming at its continuous improvement.

The Group's ESG Strategy & Sustainable Development Division 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, as well as the enhancement of the environmental awareness of the Group's employees and its business partners.

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

Compliance with legal and other requirements

The Group's projects, where required by law, have an approved Environmental Impact Study and approved environmental terms or standard environmental commitments. In addition, depending on the project, additional terms are set by the Project Owner or other interested parties to comply with for the protection of the environment. In companies where a certified Environmental Management System is applied, a specific procedure has been developed and is followed for the monitoring of the above and the collection and decoding of national legislation on environmental and energy issues in order to achieve full compliance.



### Training and raising awareness

The Group is committed to providing the necessary resources for all its employees to participate in training activities on environmental and energy issues. All employees of the Group receive the environmental and energy induction training, as well as training in the 18 Basic Environmental & Energy Rules. The aim is for employees to be informed and to recognize any impact that their work may have on the environment.

At the same time, the Group uses tools to inform and raise awareness among employees on environmental and energy protection issues, such as actions to raise awareness and transmit systematic environmental and energy messages, with the aim of developing an environmentally responsible corporate culture. In addition, environmental educational activities are organized for the Group's business partners.

### Communication and consultation

The ESG Strategy & Sustainable Development Division holds monthly meetings with the Heads of Environment & Energy of each subsidiary, in order to update and monitor the environmental action plans. The Heads of Environment & Energy, in turn, hold systematic meetings with the Environment & Energy Officers of the projects. Annually for all the Group's activities, through the Annual Sustainable Development Report, the environmental performance of its projects is communicated to each interested party. In addition and in compliance with the legislation, the Group's projects communicate environmental information and reports to the competent authorities depending on the requirements of each project.

### Recording of environmental aspects and impacts and their evaluation

The Environmental and Energy Management Departments of the subsidiaries record the environmental aspects and impacts of the Group's projects and evaluate them, with specific environmental (impact scale, severity, frequency) and business criteria (legislative compliance, difficulty in dealing with stakeholders). This process recognises relevant risks and opportunities for improvement and plans actions to mitigate environmental impacts.



Indicatively, the Group's projects have identified direct environmental aspects related to its operation, such as electricity and fuel consumption, the production of solid non-hazardous and hazardous waste, water use, refrigerant losses from the use of air conditioning, the production of liquid waste, air emissions, the consumption of raw materials, intervention in the landscape, noise production and traffic nuisances. At the same time, indirect environmental aspects are also recognized, such as the selection of suppliers, the supply of raw materials and the environmental performance of its business partners.

### Management of any environmental accidents

In the event of an environmental accident, the relevant procedures of the applied environmental management systems are followed and corrective actions are taken to prevent similar incidents in the future. In particular, in the Concessions segment, the treatment of environmental accidents is implemented in accordance with the approved Operation and Maintenance Manuals.

### Waste Management Procedures

The waste produced by the Group's activities is managed with specific procedures from collection, storage, any treatment, transport and final disposal to a licensed receiver registered in the Electronic Waste Register (EMA). Waste management is carried out according to the waste hierarchy, giving priority to prevention, reuse, recycling and sorting at source. Special care is given to the storage of hazardous waste where all legal requirements are met for the protection of the soil and subsoil from any leaks. The cooperating waste management companies are checked for their permits and the documentation of their legalization is collected. In addition, the Group's projects maintain cooperation with specialized bodies and alternative management systems for the separate collection of hazardous waste from special streams (indicatively: waste lubricating oils, used accumulators, batteries and lamps) and their environmentally proper management. Regarding air emissions, the goal is to limit them and to manage what is emitted in accordance with the current legislation and always within the



limits of environmental terms. Finally, any liquid waste that may occur, is treated and, where possible, reused and disposed of to licensed receivers.

### Environmental Management Plan in Projects

In the projects, and depending on their nature and environmental footprint, a special Environmental Management Plan is developed and implemented to mitigate their environmental impact.

### Emergency Plan

In the Group's activities and depending on the nature of each project, an Emergency Response Plan is prepared. The Emergency Response Plan outlines the management of emergencies or potential environmental accidents, the materials and resources required to respond, the contact persons for each incident, and how to communicate internally and externally. In addition, a relevant Team is appointed, which is trained and performs at repeated intervals relevant scenario preparedness exercises (such as incident at sea, waste spill, flood, fire).

### Environmental & Energy Audits

The Group's companies that have certified Environmental Management Systems are audited annually by the certification body to ensure the continuous operation and improvement of the systems. In 2023, 21 external inspections were carried out by external bodies (competent authorities, certification bodies) on the Group's projects. In addition, in order to comply with environmental legislation, environmental terms and internal procedures, an internal environmental audit program was implemented in 2023, with 39 internal audits carried out by the team of internal auditors and 53% of active projects were audited. From the internal and external audits, 9 deviations were identified and recorded and relevant corrective actions were planned for their withdrawal with a rate of 89%.

### Monitoring and evaluation of environmental & energy indicators

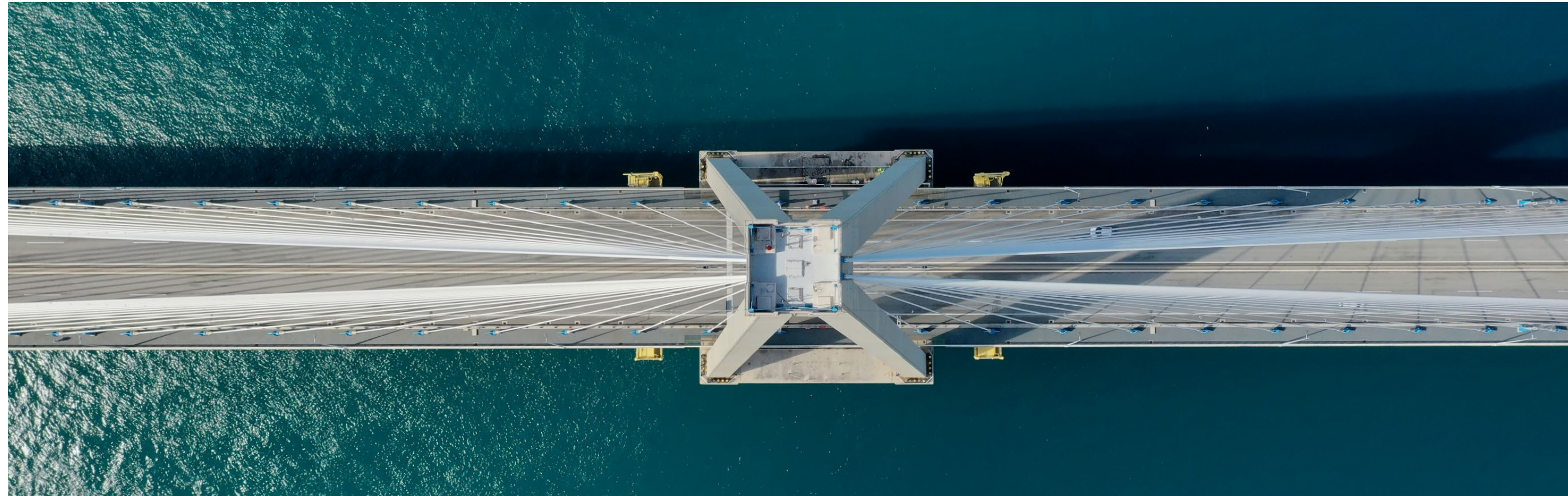
The Group records and monitors environmental performance indicators which are mentioned below and sets goals for their continuous improve-

ment. For the calculation 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 each Environment & Energy Officer. In the projects and depending on the requirements of the environmental conditions, measurements are carried out to check compliance with any limits on environmental parameters that have been established.

### Review by Management

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

The cost spent on environmental protection projects, such as, among others, waste management infrastructure, environmental impact studies and measurements of environmental parameters, amounted to €778,311 for 2023. In addition, the cost spent on the management of the waste resulting from the operation of the Group amounted to €248,339.





# Climate change

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

At the same time, the Group is considering expanding its activities into new sectors by exploiting innovative technologies, which are going to be areas of great development interest in the next decade.




## ENERGY PRODUCTION FROM RENEWABLE ENERGY SOURCES

In total, the Group’s companies operate 10 RES projects with a total capacity of 43.1 MW.

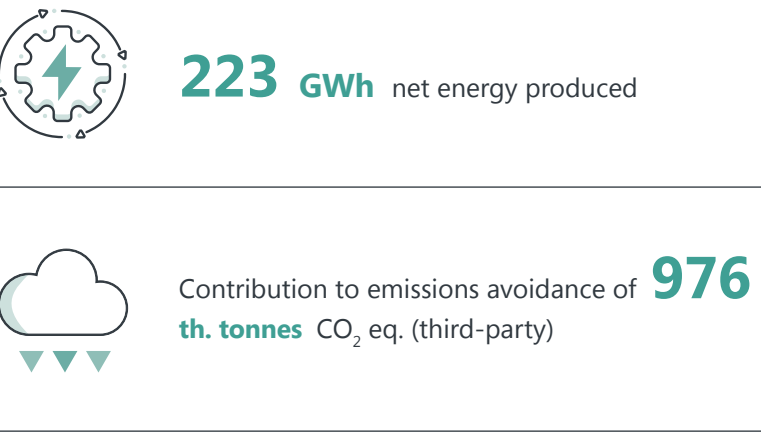
In particular, the portfolio of the Environment segment includes the utilization of biogas produced from waste disposal sites and its conversion into electricity (203 GWh) attributing to the grid. HELECTOR, possessing significant know-how in the energy utilization of biogas produced in landfills, has 4 biogas utilization units in Ano Liosia, Tagarades, Mavorachi and Kozani with a total installed capacity of 32.8 MW. It is worth mentioning that the Power Plant at Fyli landfill in Ano Liosia, with a total capacity of 24.2 MW, which was designed, constructed and operated by the Group, is among the largest in the world.

Through the net production of 223 GWh of electricity from RES in 2023, it is estimated that the Group contributed to the prevention of emissions of 976,226 tonnes of CO<sub>2</sub> eq.<sup>1</sup> third parties in the atmosphere. It should be noted that the energy consumption within the organization for the operation of the Group was 124 GWh (see section «[Energy consumption](#)»).

### 2023 GROUP’S RES PROJECTS

	<div>3</div> <div>wind farms</div> <div>7.8 MW</div> <div>installed capacity</div> <div>16.5 GWh</div> <div>net energy produced</div>
	<div>4</div> <div>biogas utilization plants</div> <div>32.8 MW</div> <div>installed capacity</div> <div>203 GWh</div> <div>energy produced</div>
	<div>3</div> <div>photovoltaic parks</div> <div>3 MW</div> <div>installed capacity</div> <div>3.4 GWh</div> <div>energy produced</div>

### ENERGY PRODUCTION FROM RES

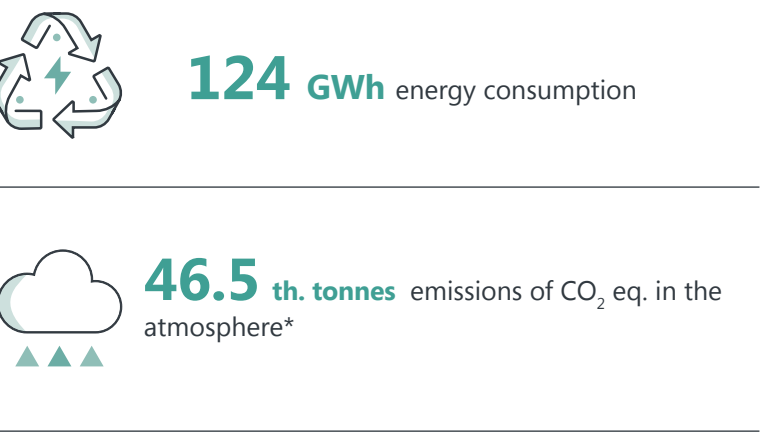


\* Scope 1 & 2 Greenhouse Gas Emissions (GHGs) are included. Scope 1 direct emissions do not include biogenic CO<sub>2</sub> emissions, which, according to the GHG Protocol, are reported separately.

In addition to biogas utilization plants that are considered to produce low carbon products, the Environment segment also produces compost, SRF (solid recovered fuel) and RDF (refuse-derived fuel).

The compost produced by the compost units (EMAK Ano Liosia and MEA Kozani), also offers a sustainable alternative to soil improvement, enhancing soil health and reducing the effects of climate change. Compost works by enhancing soil composition and water retention and improves soil organic content. At the EMAK

### ELLAKTOR GROUP’S OPERATION



(Mechanical Recycling Plant) of Ano Liosia, 950 tonnes of compost from bio-organic waste was produced.

HELECTOR’s facilities also produce alternative fuel (RDF/SRF) from waste, which has a caloric value, provides an energy benefit and contributes positively to the reduction of the amount of waste that ends up in landfills. In 2023, 2,814 tonnes of RDF were produced, which can partially replace the primary fossil fuels used in industry. Also, at the EMAK plant in Ano Liosia, the production of SRF (solid recovered fuel) amounted to 6,270 tonnes.

The Group’s total activity producing low-carbon products constitutes 5% of its total turnover for 2023.

<sup>1</sup>For the calculation, the CO<sub>2</sub> emission factors included in the Report of the Energy Mix of Production of the Country for 2022 (ENERGY MIX 2022, DAPEEP, July 2022) has been used. For the calculation of CH<sub>4</sub> emissions, the relevant emission factors from the DAPEEP Report for the year 2022, the National Greenhouse Gas Emissions Inventory Report 2022 and the CRF 2022tables have been used . The amount of methane that is driven to combustion in biogas plants and not released into the atmosphere has also been calculated.

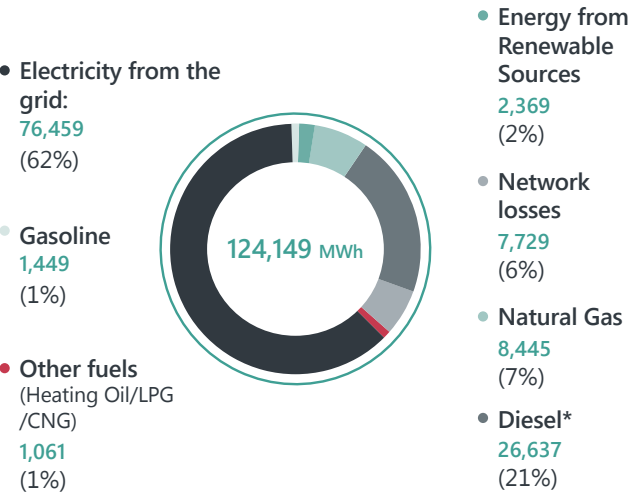


ENERGY CONSUMPTION

An integrated energy management is applied throughout the Group’s activities with the aim of rational use and energy saving, through programs and actions. Energy consumption is systematically recorded and monitored, both in the Group’s projects and in the headquarters. For the most efficient management of energy, the companies MOREAS, ATTIKES DIADROMES, ATTIKI ODOS, Development of New Alimos Marina, HELECTOR and its subsidiary ASA RE-CYCLE of Aspropyrgos, implement certified Energy Management Systems, according to the ISO 50001:2018 standard (75% of projects based on turnover). In 2023, the Group’s total energy consumption amounted to 124,149 MWh (447 TJ). The largest percentage of energy consumed derived from electricity consumption from the grid (62%) and fuel consumption (30%), with diesel as the main fuel (21%), which is mainly used for heavy vehicles (excavators, loaders, trucks, etc.). The percentage of energy consumed derived from renewable sources was 2%, mainly from self-consumption of electricity in Greece (99%) and a minimal amount of wood pellets abroad (1%). The energy uses for the operation of the Group mainly include the operation of construction machinery, vehicles and electromechanical equipment, heating, cooling and ventilation systems, combustion units, motorized systems (compressed air and pumping), generators and lighting. At the headquarters, with the implementation of energy-saving practices, such as the installation of a network of a number of internal meters for continuous monitoring, but also the continuous training of employees with the aim of improving energy behavior, energy consumption amounted to 0.184 MWh/m2, showing a decrease of about 16% compared to 2022.

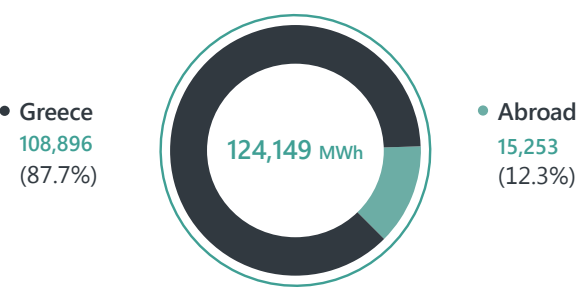
For 2023, the Group’s projects and activities recorded energy management actions with an estimated energy saving of 3,678 MWh, compared to 200 MWh in 2022 and cost savings of €749,150 per year, for which €2,090,782 was spent. These actions led to the avoidance of 1,277 tonnes of CO<sub>2</sub> eq.

Energy Consumption (MWh)

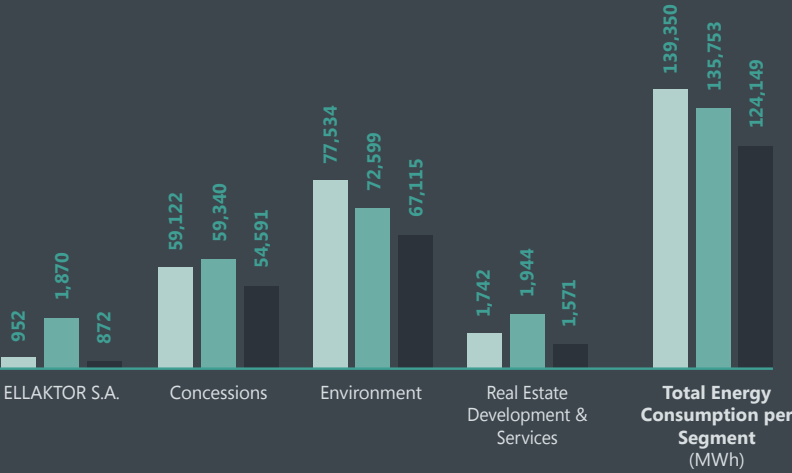


\*Diesel consumption refers to the use of Heavy Vehicles, such as excavators, loaders, trucks (63%), the use of corporate vehicles (7%), the use of fixed mechanical equipment (3%), the use of light vehicles (25%) and generators (2%).

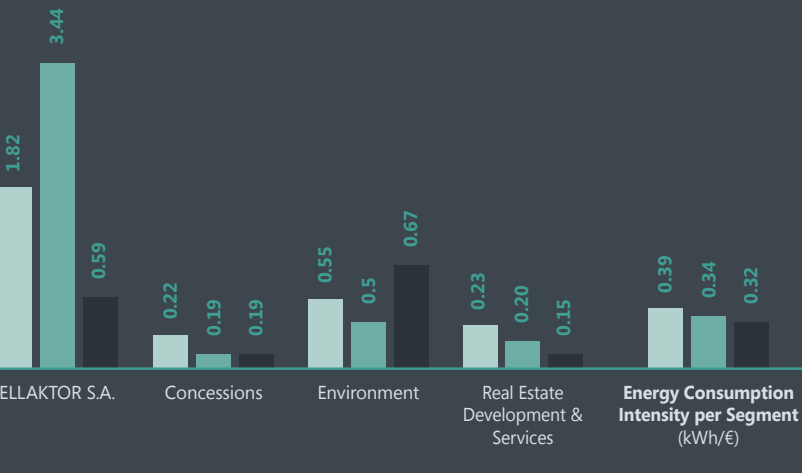
Total Energy consumption per country (MWh)



Total energy consumption by segment (MWh)



Energy Consumption Intensity per segment (kWh/€)\*



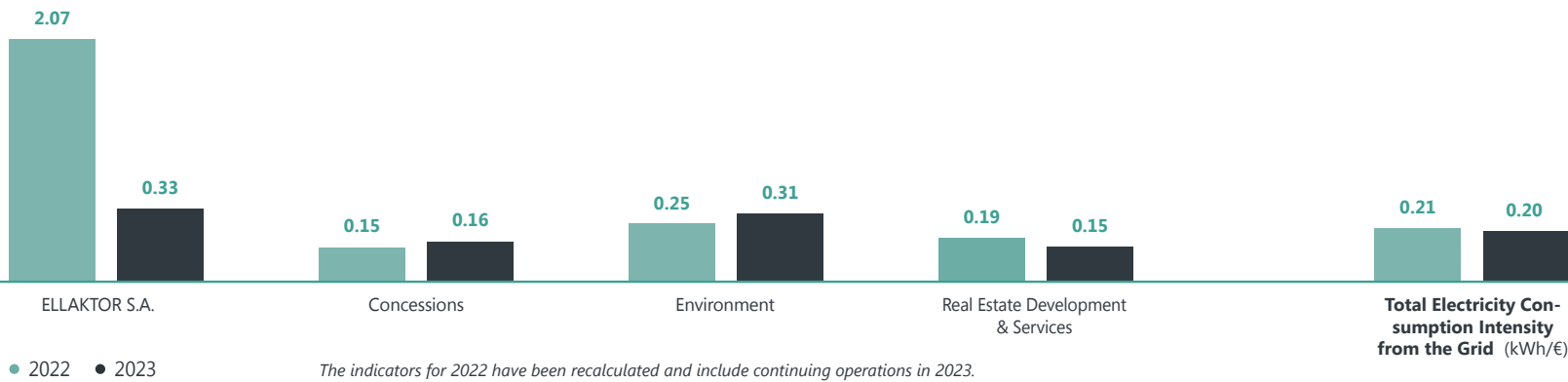
● 2021 ● 2022 ● 2023

\* The 2022 and 2021 indicators were recalculated with the turnover after intrasegment eliminations for the Group as a whole and with the turnover before intrasegment eliminations for the individual segments for comparison with the corresponding 2023 indicators.

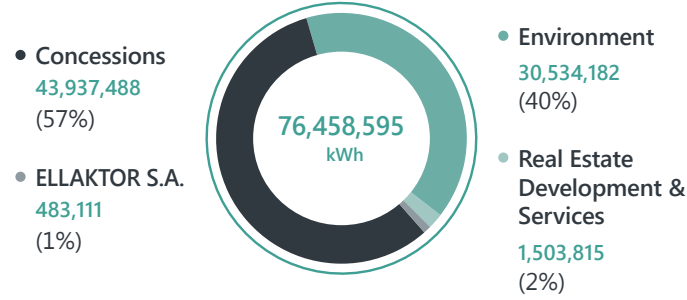




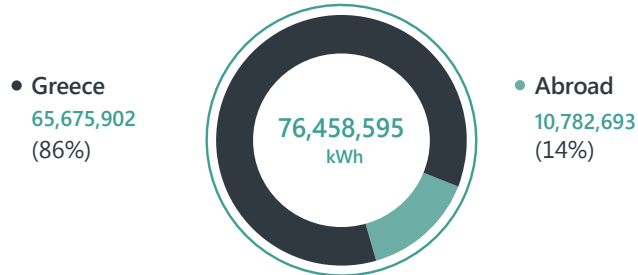
### Electricity consumption intensity from the grid (kWh/€)



### Electricity consumption from the grid by segment (kWh)



### Electricity consumption from the grid (kWh)

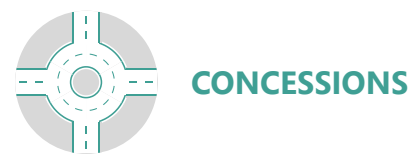


In more detail, the actions implemented by segment to reduce the consumption of energy from non-renewable sources are analyzed below:



In the building where the Group's headquarters are located, the following actions were implemented in order to save energy:

- In collaboration with the owner company, photovoltaic panels were installed on the roofs of the building, part of which is occupied by the Group's headquarters. The project is Net Metering and has an installed capacity of 232 kW.
- Completion of the Environment & Energy induction training program for the company's employees. Continuation of a monthly program of transmission of environmental and energy flashes with emphasis on energy saving issues.
- Gradual replacement of the company's leased vehicles in case of lease expiration with pure electric vehicles or hybrid electric vehicles with external charging.
- A program for the installation of charging stations and fast chargers to serve the charging needs of vehicles at the headquarters in cooperation with the owner company.
- A network of electricity meters was installed in the entire building of the Group's headquarters, for the recording of energy per energy use and continuous monitoring of its consumption, in collaboration with the owner company.



### Actions to Reduce Energy Consumption

In the Concessions segment, based on the continuous target of energy saving, MOREAS S.A. continued in 2023, the energy saving program and implemented a series of actions, such as the replacement of open road luminaires in the parking lots along the Motorway and the energy upgrade of the Filellinon Tunnel (Neochori) and the Sterna Interchange Section – Filellinon Tunnel (Neochori), with an estimated annual energy saving of 385 MWh. Through the design and implementation of electricity saving actions, over the last 6 years a systematic trend of reducing electricity consumption has been recorded.

More specifically, in 2023 the following actions were carried out:

- Replacement of 120 open road luminaires in the parking lots along the Motorway. This action was completed in March 2023, with an estimated annual energy savings of approximately 75 MWh, corresponding to an approximately 57% reduction in electricity consumption in parking lots.
- Energy upgrade of the Filellinon (Neochori) Tunnel, through the replacement of the existing lighting fixtures with corresponding LED lights. This action was completed in May 2023, with an estimated annual energy saving of approximately 210 MWh, which corresponds to an approximately 50% reduction in electricity consumption for lighting the road section.
- Energy upgrade of the Sterna Interchange Section – Filellinon Tunnel (Neochori) through the replacement of the existing light fixtures of the open road construction of the separating island with corresponding LED type. This action was completed in July 2023, with an estimated annual energy savings of approximately 100 MWh, which corresponds to an approximately 51% reduction in electricity consumption for lighting the road section.



Regarding Attiki Odos project, in 2022, an extensive program for the replacement of lighting fixtures with LEDs was implemented. The replacement concerned the lighting luminaires in the toll booths (465 LED luminaires), while in 2023 the replacement in the buildings of the companies' central facilities in Peania was completed (950 LED luminaires). From the replacement, the consumption reduction is of the order of 50% for the specific buildings where the action was carried out, while it is estimated that the electricity consumption for these infrastructures consists 15% of the total consumption of the project. In 2023, actions were implemented in the Alimos Marina project, such as the issuance of an energy-saving guide, the installation of electricity recording meters in the individual uses in the offices, the replacement of air conditioning units and the replacement of LED lamps in the offices.

- In the project of the ASA of Aspropyrgos, the replacement of LED lamps was completed with an annual saving of 2,995 kWh.
- In the STERILIZATION project, the replacement of 20 LED lamps was implemented with an annual saving of 1,498 kWh.

### Monitoring of energy indicators

Companies in the Environment segment, seeking continuous improvement in their environmental performance, monitor specific performance indicators (such

as energy consumption per waste treatment quantity, 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 energy needs are managed and constantly analyzes possible possibilities for improving energy efficiency, taking the appropriate implementation actions\*:

- Installation of Management and Automated Control Systems in the factories.

- Installation of a Power Management System.
- Installation of an advanced Distributed Control System (CMDA).
- Implementation of a Maintenance and Equipment Inspection program.
- Implementation of emergency systems for maintenance work and possible disruptions of the operating system.

*\*These actions mainly concern the companies Incinerator Lease Consortium, EPALTHEA, Sterilization, ERADYM and BEAL.*



## ENVIRONMENT

In the Environment segment and specifically in the projects of HELECTOR, the following actions have been carried out in 2022 and 2023 with a total annual energy saving of 3,216 MWh:

- Within 2023, the installation of photovoltaics, with a total capacity of 3MWp, on the roofs of the buildings of the Waste Management Facility of Western Macedonia, in Kozani, was completed, and the system was put into operation in January 2024. This energy is expected to have an annual saving of 2,800 MWh and reduce the unit's carbon footprint by 42%. In addition, electric blankets were installed for local heating of chemical pallet tanks with an annual saving of 75,000 kWh, an Inverter was installed in the bag filter of the socket with an annual saving of 210,000 kWh, and LED lamps were replaced with an annual saving of 118,000 kWh.
- In the Mavrorachi biogas utilisation project, the replacement of all LED light bulbs (45) with an annual saving of 8,400 kWh was completed.

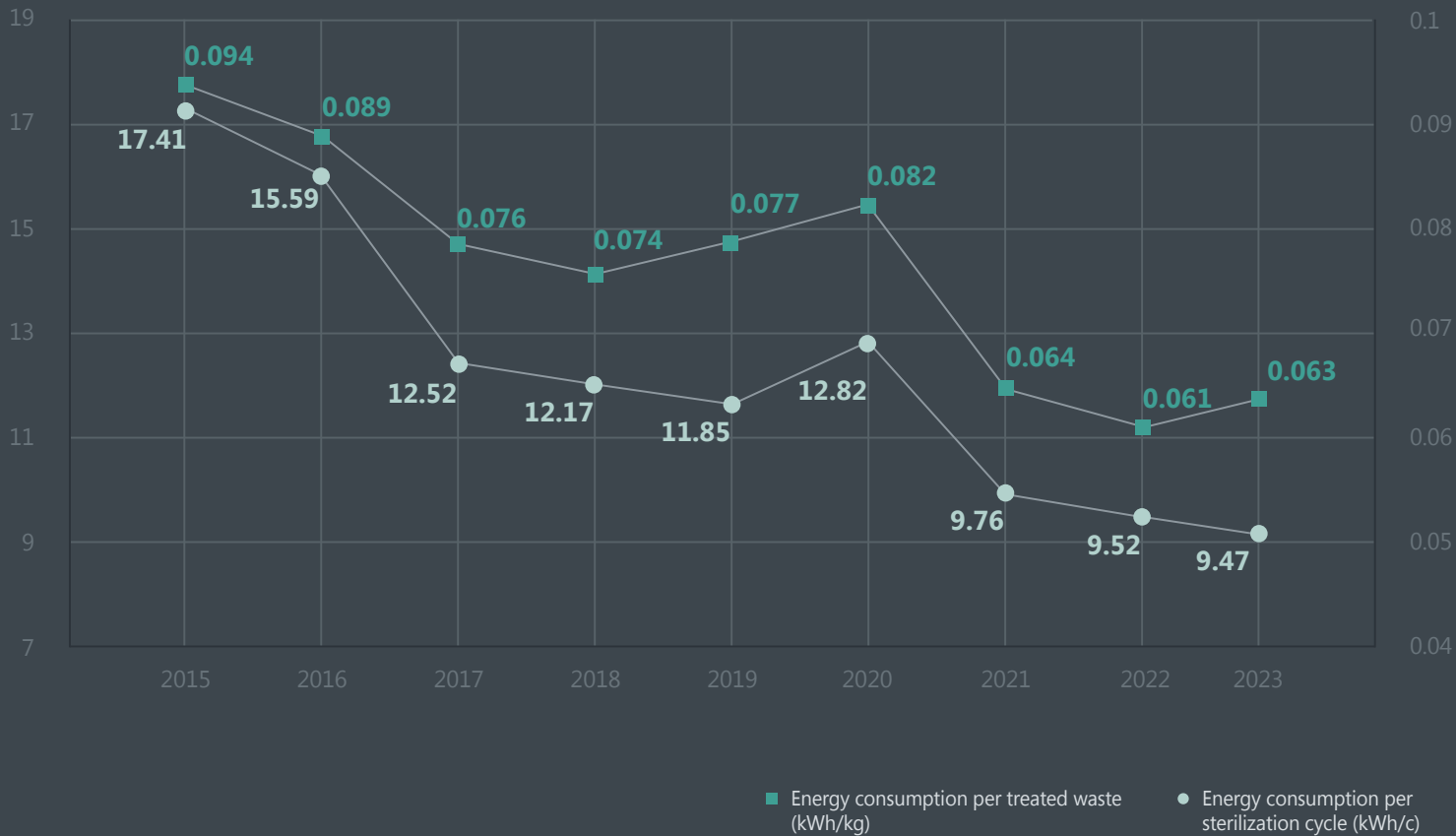




STERILIZATION S.A.

After the normalization of COVID-19 and the introduction of the 4th system in 2021, there has been a stability in electricity consumption. In 2023, it was characterized by high temperatures, while a series of events in the area (floods, fires) led to an interruption of a few days of operation, but also to a more controlled flow of waste to the plant. The above, combined with the slight reduction of incoming waste, allowed the phenomenon of high temperatures to be dealt with and led to a stabilization of electricity consumption.

Specific energy consumption «STERILISATION S.A.»



Fuel consumption is decreasing in 2023, mainly due to:

- the slight reduction in transported waste,
- improving the maintenance of waste vehicles and acquiring a vehicle with greater capacity and newer technology (Euro 6);
- interventions and the stabilization of the route schedule, resulting in the optimization of the use of vehicles.

Specific fuel consumption for transporting waste by «STERILISATION S.A.»





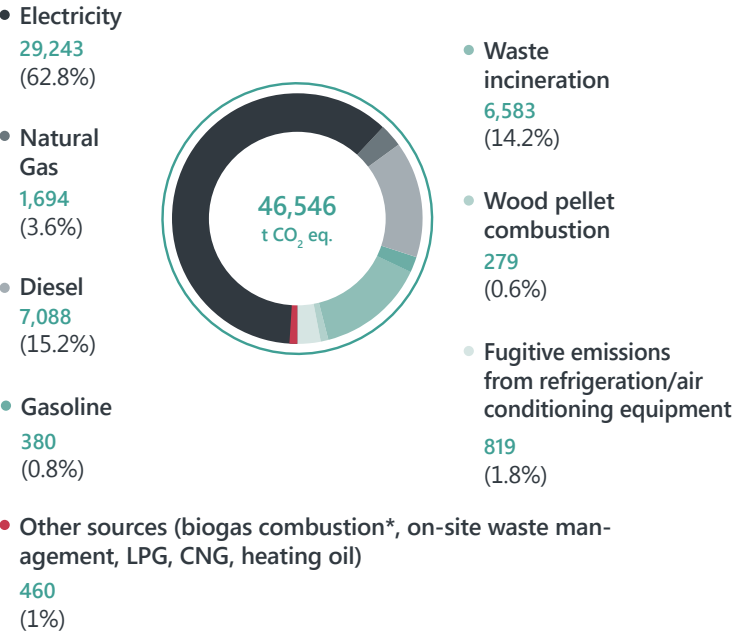
GREENHOUSE GAS EMISSIONS (GHG)

In 2023, direct greenhouse gas emissions (GHG) Scope 1 amount to 17,303 t CO<sub>2</sub> eq.\*, constitute 37% of Scope 1 & 2 emissions and relate to (i) emissions from fuel combustion in stationary and mobile units, (ii) fugitive emissions from refrigeration/air conditioning equipment and (iii) emissions from waste management within inventory boundary. The Group's indirect greenhouse gas emissions (GHG) Scope 2, constitute 63% of Scope 1 & 2 emissions and amount to 29,243 t CO<sub>2</sub> eq. (according to the location-based method\*\*) and derive from the consumption of electricity from the grid.

The Group's biogenic\*\*\* CO<sub>2</sub> emissions for 2023 were estimated at approximately 108,095 t CO<sub>2</sub>. Specifically, 108,086 t of CO<sub>2</sub> derive from the processes of biogas utilization plants and 9 t CO<sub>2</sub> from the combustion of wood pellets (emission sources related to HELECTOR's activities). It is worth mentioning, however, that CO<sub>2</sub> emissions eq. from the biogas utilization activity of landfills would be many times higher than the non-existence of these plants, as a large amount of CH<sub>4</sub> would be released into the atmosphere, resulting in the overall positive impact from these plants being much greater than their carbon footprint. In addition, for 2023, at HELECTOR's biogas utilization plants, the amount of biogas used for energy production was 1,875,781 MMBtu (1,876,280.41 total amount of biogas, of which 499.88 MMBtu was burned in a torch).

In 2023, the Group's greenhouse gas emissions (GHG) are estimated at 46,546 tonnes of CO<sub>2</sub> eq.\*\*\*\* (Scope 1 & 2), reduced by 27% compared to 2021. Indirect emissions from electricity consumption from the grid (Scope 2) decreased by 45%, while direct emissions (Scope 1) increased by 68% compared to 2021, mainly due to the disclose of additional sources, following the review process of direct and indirect greenhouse gas emissions carried out by the Group with the aim of disclosing all emissions. The reduction in Scope 2 is due on to energy saving actions of electricity consumption and to the improvement of the country's energy mix. The Group's greenhouse gas emissions (GHG) are estimated 45,143 tonnes of CO<sub>2</sub> (Scope 1 & 2) for 2023.

GHG Scope 1&2 (t CO<sub>2</sub> eq.)



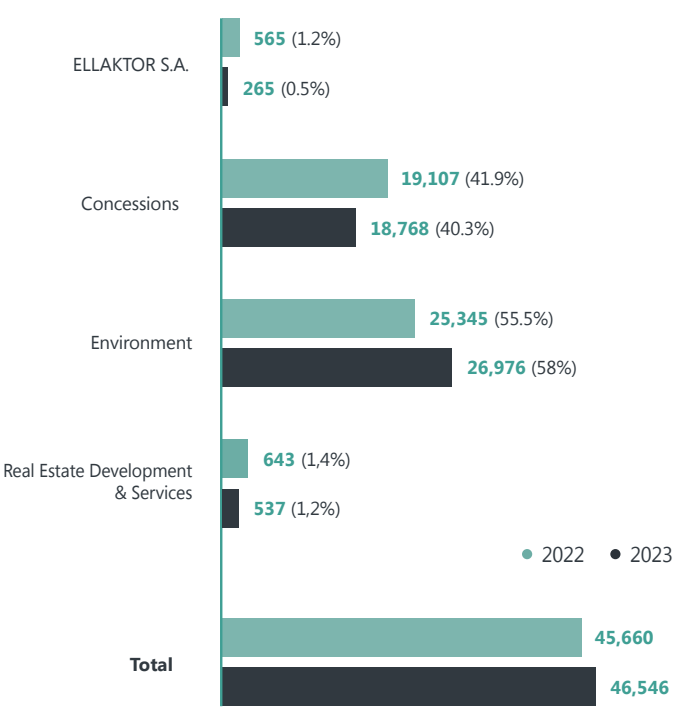
\* CH<sub>4</sub> and N<sub>2</sub>O emissions from the biogas utilization process and from the combustion of wood pellets to CO<sub>2</sub> equivalent have also been calculated.

\*\* 35,099 t CO<sub>2</sub>eq. according to market based method.

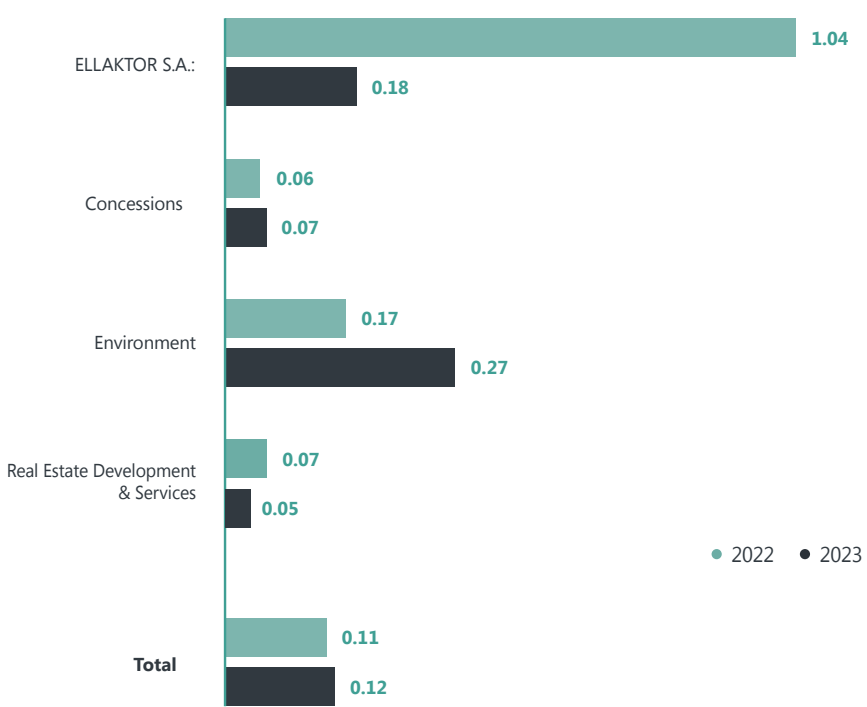
\*\*\* information separately from direct Scope 1 emissions according to the GHG protocol.

\*\*\*\* The methodology for calculating emissions for the reference years 2022-2023 is based on both the widely recognized GHG Protocol and the International Standard ISO 14064-1:2018 and the emission factors from the documents were used: Greece- National Inventory Submissions 2022 and 2023, DAPEEP 2022 and 2023, IPCC - AR5, IEA, ecoinvent 3.10, EPA 2023, Germany- National Inventory Submissions 2023, DEFRA 2023. Biogenic CO<sub>2</sub> emissions are not included in the direct emissions of Scope 1, which, according to the GHG Protocol and ISO, are disclosed separately.

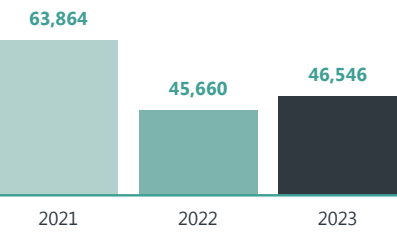
GHG Scope 1&2 emissions per segment (t CO<sub>2</sub> eq.)



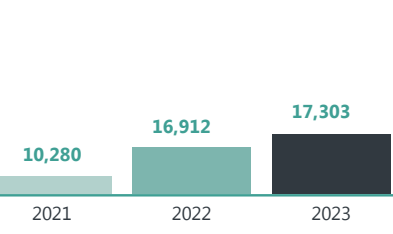
GHG Scope 1&2 emission intensity per segment (kg CO<sub>2</sub> eq./turnover €)



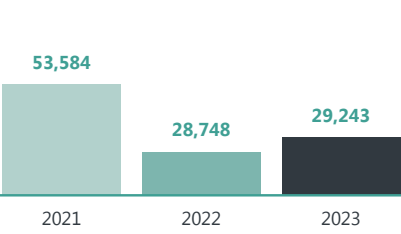
GHG Scope 1&2 (t CO<sub>2</sub> eq.)



GHG Scope 1 (t CO<sub>2</sub> eq.)



GHG Scope 2 (t CO<sub>2</sub> eq.)



The indicators for the years 2021 & 2022 have been recalculated and include the continuing operations activities of 2023.

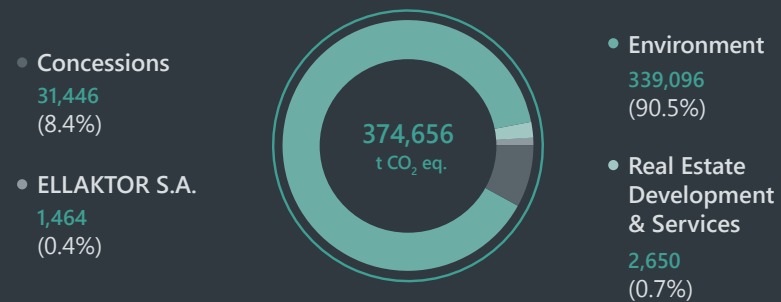
### Other indirect greenhouse gas emissions (GHG Scope 3)

The methodology for the calculation of the Group's other Scope 3 indirect emissions was based, both on the widely recognized GHG Protocol and on the International Standard ISO 14064-1:2018. For the year 2023, the Group, after collecting data on additional categories of greenhouse gas emissions, completed the process of calculating the total Scope 3 emissions. The other indirect Scope 3 emissions recorded by the Group are estimated at 374,656 t CO<sub>2</sub> eq. and are presented in the following graph by category.

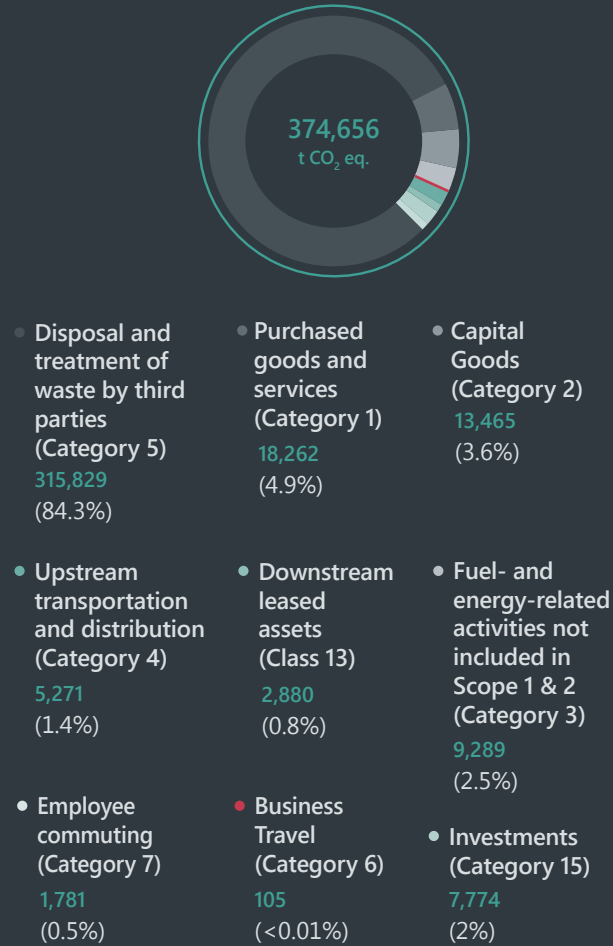
The differentiation in indirect emissions referred to in the [2023 Annual Financial Report](#), for category 4 is due to the fact that additional data from the transport of goods and from the production of fuel consumed by the Group's subcontractors were collected and calculated and for category 13 additional data were also collected and calculated from REDS users.

Categories 8, 9, 10, 11, 12 and 14 of Scope 3 do not fall within the Group's activity.

### Other indirect GHG Scope 3 emissions (t CO<sub>2</sub> eq.) by segment



### Other indirect GHG Scope 3 emissions (t CO<sub>2</sub> eq.) by category



**Note:** In case a subsidiary of the Group acts 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.

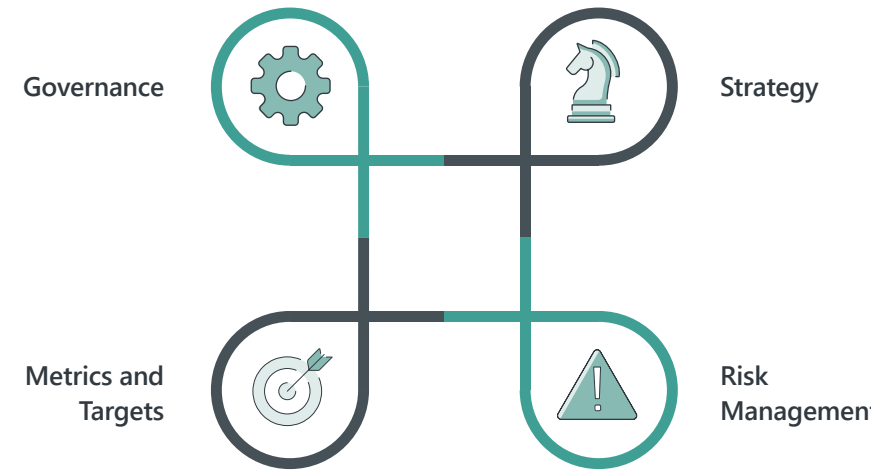
### ADAPTATION TO CLIMATE CHANGE

#### TCFD Report Results

In order to strengthen its resilience to climate change, the Group has completed the process of identifying and analytically assessing climate risks and their potential financial impacts in line with the recommendations of the TCFD (Task Force on Climate – related Financial Disclosures) and is in the process of designing a Climate Risk Management plan.

At a time marked by unprecedented environmental challenges, the need for absolute transparency in the identification and recording of climate risks and opportunities is now of paramount importance. In this context, ELLAKTOR Group, guided by the recommendations of the TCFD, systematically records and analyzes the impact of climate factors on its economic performance, ensuring that investors, stakeholders and the general public remain informed about the Group's commitment to sustainable development.

In line with the TCFD recommendations, the mapping is structured around the following four thematic pillars: Governance, Strategy, Risk Management and Metrics and Targets. A summary is provided below, which is based on the Group's full TCFD report on climate risks and opportunities.



ELLAKTOR Group places particular emphasis on environmental management, climate risks, sustainability and governance practices. Going beyond compliance, the Group aims at long-term value, with effective risk management, strategy to align with current legislation, as well as maintaining financial stability.



### A. The oversight of the Board of Directors for climate risks and opportunities.

The Group aims to mitigate the identified risks and seize the opportunities related to climate change, a dynamic process in which both the Board of Directors and the Group's Management are actively involved.

The Board of Directors, through the Sustainable Development Committee, supervises the Group's progress towards achieving climate goals, with the help of appropriate and scientifically substantiated indicators. In addition, the oversight of the Board of Directors, through the Sustainable Development Committee, includes the assessment of policy and regulatory developments related to climate change, the review of the Group's environmental performance, the approval of the relevant budgets, the assessment of the impact of climate risks and the approval of the long-term strategic planning for climate objectives.

In addition, the Group operates within an effective governance framework, with specialized committees supporting the Management. One such committee is the Committee on Sustainable Development. This Committee assists the Board of Directors and is responsible for the approval, supervision, monitoring and implementation of the Group's Sustainable Development Strategy and the Sustainable Development Roadmap, assessing the adequacy and effectiveness of the Sustainable Development Policy approved by the Board of Directors, as well as ensuring the adequacy of the resources for its implementation. In addition, he supervises the actions related to the sustainable development of the Group and the harmonization of practices related to environmental and social issues, both with the Group's sustainable development strategy and with the policies approved by the Board of Directors.

### B. The role of Management in the assessment and management of climate risks and opportunities.

The majority of the members of the Board of Directors, as well as high-ranking executives of the Group, have both the necessary know-how and experience on issues related to sustainable development and climate change.

Among senior management executives, the President of the Board of Directors, the CEO, the members of the Sustainable Development Committee and the Head of Strategic Development hold important roles in promoting sustainability and aligning strategic goals on environmental and social responsibility.

The President of the Board of Directors is responsible for convening the meetings of the Board of Directors. As the main representative of ELLAKTOR Group, he is in charge of shaping the individual key components and the direction of the strategy, defining together with the other members of the Board of Directors the vision, goals and initiatives related to sustainability and tackling climate change. In this context, it advocates the identification and description of policies and actions on sustainability and climate change issues, as part of the Group's overall strategy. At the same time, he is responsible for overseeing the processes related to the climate risk management cycle and strengthening the company's long-term resilience. In addition, he leads the Sustainable Development Committee focusing on sustainable development and climate change issues.

In addition to the Chairman of the Board of Directors, the Chief Executive Officer plays a key role in the formation and implementation of the Group's strategic direction, with an emphasis on sustainability and climate change. The CEO acts as a bridge that connects the company with the Board of Directors, implementing the decisions of the Board of Directors and leading the process of developing and improving the Group's Strategic Planning. He leads the integration of sustainable practices into all key processes, including the supply chain and the develop-

ment of new products and services, ensuring alignment with the Group's overall strategy and mission. By actively engaging with the Board of Directors and other senior executives, the CEO aligns sustainability goals with broader business goals and long-term financial strategies. In particular, in 2022, he approved both the launch of the Roadmap for the transition to a zero-emission future by 2050, as well as the new Environmental and Energy Policy at Group level, highlighting the commitment to climate change as one of the Group's strategic pillars. By assessing the Group's environmental impact, the CEO makes strategic decisions on climate-related issues and oversees the formulation and validation of the Group's entire environmental policy. This responsibility extends to embedding sustainability at the core of the Group's culture and operations, which includes working with the Group's various Divisions and Departments.

An important and integral member of the company's Management on climate change and sustainability issues is the Group's Head of Strategic Development. The Head of Strategic Development is responsible for the development, implementation and review of the Group's strategic planning. Her primary role includes integrating climate-related factors into the strategic planning process, identifying and assessing climate-related risks, monitoring their progress and implementing strategies to mitigate their impact on the Group's activities, thereby enhancing overall performance and profitability. In addition, the Group's Head of Strategic Development provides the necessary information on the Sustainable Development Reports and evaluates the effectiveness of the relevant policies, utilizing all available tools. As a key member

of the Sustainable Development Committee, the Head of Strategic Development, plays a central role in promoting sustainability initiatives, promoting a unified approach and aligning the Group's strategic direction with its commitment to environmental, social and governance issues.

In addition, he is a member of the Board of Directors and the Sustainability Committee, he is a business consultant and engineer of new technologies and innovation, specializing in infrastructure, environmental protection, natural resource management and strategy development in investments in the context of the energy transition and the circular economy.

Finally, ELLAKTOR Group, through the Sustainable Development Committee, actively interacts, both with national and global bodies and associations, promoting the best sustainability practices. At the same time, it performs regular audits in order to optimize its policies.



### Strategy

The pillar of the strategy outlines the approach and key priorities of ELLAKTOR Group to effectively address climate challenges, while ensuring its business continuity. Through this process, the Group examines how it integrates climate risk management into its strategy, the extent to which these risks affect its long-term business operations and the effectiveness of decisions related to their management.

The adoption of a clearly defined strategy for adaptation to climate change is not only the basis for the effective management of climate risks, but also for identifying opportunities that can positively impact the Group's activities, ensuring long-term resilience and sustainability. By aligning its strategic and business goals with climate goals, ELLAKTOR Group aims to accelerate the sustainable transition towards a zero-emission future, enhancing its competitiveness and building trust among stakeholders, such as investors and the wider society.

#### A. Climate risks and opportunities identified by the Group in the short, medium and long term

Following the recommendations of the TCFD, ELLAKTOR Group has proceeded to identify and assess the climate risks and opportunities that are expected to affect its operation by 2050. In this light, the Group assessed the risks and opportunities arising from the constantly evolving context and the changing climate, based on the severity of their impact on the Group's operations and the likelihood of their occurrence.

In particular, ELLAKTOR Group recognizes risks and opportunities that may affect its activities, taking into account their geographical location, as well as the different nature of the sectors of activity. The identified risks and opportunities were classified based on the severity of the impact on the Group's infrastructure and operations, as well as the likelihood of occurrence over 3-time horizons as follows:

- Short-term (until 2030): Within this timeframe, ELLAKTOR Group is aligned with financial planning to set policies, measures and targets in order to address risks that could have a significant economic impact during this period.
- Medium term (until 2040): During the period 2030-2040, ELLAKTOR Group will aim for substantial changes, related to the integration of new technologies, the investment strategy of the current decade, as well as possible changes in climate conditions and the regulatory framework.
- Long-term (by 2050): ELLAKTOR Group's long-term strategy is closely aligned with the goal of achieving zero emissions, highlighting its commitment to mitigating environmental impacts and moving to a zero-emission future.

According to the TCFD recommendations, climate-related risks and opportunities are:

- **Physical risks:** Extreme weather events and long-term variability.
- **Transition risks:** Legislative and legal risks arising from changes in legislation, technological, market and reputational risks.

- **Opportunities:** Resource efficiency, energy sources, products and services, market, resilience.

Following internationally recognized standards, the climate risks identified and likely to affect the Group's operations include fires, floods, heatwaves, changes in technology, reputation, market, carbon pricing and changes in legislation. However, new opportunities are expected to arise from these challenges. The need for innovation in dealing with and adapting to new climate conditions creates opportunities for the development of products and services linked to the improvement of businesses and society.

In particular, ELLAKTOR Group aims to adopt innovative technologies, and to adapt to market changes in all its sectors of activity. By identifying climate-related opportunities such as sustainable products, renewable energy solutions and market diversification, the Group aims to align itself with consumer preferences and regulatory trends, while strengthening its competitive advantage. Its economic strategy addresses climate change across products and services, supply chain, R&D investments, and operations, including environmentally friendly products, supply chain resilience, R&D investments, and operations that are highly sensitive to climate change.

#### B. Impact of climate-related risks and opportunities on the Group's activity, strategy and financial planning

The assessment was based on the severity of the impacts and the likelihood of their occurrence. The assessment was applied to a number of areas, including, but not limited to, the products and services offered, the value chain, mitigation and adaptation initiatives,



investments in research and development projects, and the operational processes of Group's activities. As a result, the significance of each identified risk in all the different areas of the Group was calculated. Fires, floods and heatwaves represent physical risks that can cause serious damage to infrastructure and facilities, and can cause significant disruptions to the supply

chain. In addition, technological changes and changes in legislation may increase the Group's exposure to legal risks, creating further challenges and uncertainties. The overview of the results of the analysis is presented in the following table, ranging from green (lowest significance) to red (highest significance).

The effort to address and adapt to climate change may potentially bring positive effects and business prospects for the Group. These perspectives



include the efficient use of resources for cost savings, the adoption of low-emission energy sources, the innovation of new products and services, compliance with climate change legislation, the meeting of the requirements of environmentally conscious suppliers and customers, the integration of technological developments and the strengthening of supply chain resilience. The nature of these opportunities varies depending on the geographic location, market dynamics, and industry of activity.

To conduct a comprehensive economic assessment of climate-related risks and opportunities, the specialized tool “S&P Global Sustainable 1 Clima-

nomics®, Risk Analytics Platform” was used, which is fully aligned with TCFD requirements and integrates climate and socio-economic data with econometric models and business data, linking physical impacts with the economic data of companies under different climate scenarios. The timeframe for the projections (model results) is delimited in ten-year increments, starting from the current decade (2020-2029) and reaching the 2050s. The results are presented as average annual loss and average annual gain for risks and

opportunities, respectively. The understanding of the economic impact of potential risks and opportunities, with a focus on the current decade 2020-2029, was conducted with the aim of further empowering decision-making and ensuring the long-term sustainability of the Group.

The economic assessment of climate-related risks and opportunities was carried out for two different scenarios: RCP8.5 (adverse scenario) and RCP4.5 (moderate

scenario in line with the Paris Agreement), covering each risk and opportunity category, as well as a comprehensive assessment of all risks and opportunities. Although a future scenario is accompanied by a significant degree of uncertainty and inherent assumptions, the economic impact assessment was carried out with a view to a deeper understanding of potential trends, while clarifying that the results of this scenario should not be considered as a forecast for the Group's future financial performance, as they do not take into account the volatility and dynamics of financial markets, and other factors that can significantly affect economic conditions.



LEVEL OF SIGNIFICANCE OF CLIMATE-RELATED RISKS IN VARIOUS SEGMENTS OF THE GROUP

Climate Risks	Impact	Level of significance per segment		
		Concessions	Real Estate Development & Services	Environment
Long-term climate variability	Products and Services Supply Chain Mitigation & Adaptation Measures Investments in Research & Development projects Production Processes	Low	Low	Low
Acute variability		Critical	Critical	Critical
Technology		Critical	Critical	Critical
Carbon Pricing		Low	Critical	Critical
Reputation		Critical	Critical	Critical
Market		Catastrophic	Catastrophic	Low
Regulatory and Legal Framework		Critical	Critical	Critical

Level of significance: Low Medium Critical Catastrophic

The results showed that the risks of the Regulatory and Legal Framework and the Market are particularly important for most segments, while risks such as Carbon Pricing, Extreme Natural Events, Technology and Reputation are critical. Long-Term Climate Variability was assessed as low-importance.



C. Resilience of the Group's strategy, taking into account different climate-related scenarios, including a 2°C scenario or a lower scenario

The primary goal of ELLAKTOR Group is to achieve the transition to zero emissions by 2050, while adapting to the inevitable effects of climate change. Addressing climate risks, through the integration of targeted actions into its strategic planning, is the cornerstone for the development of an integrated roadmap that will lead to a sustainable and resilient transition towards climate neutrality.

To ensure its resilience to the risks posed by climate change, ELLAKTOR Group seeks to base its strategy by taking into account five different climate scenarios (three climate policy scenarios and two greenhouse gas emission concentration scenarios), which include climate assessments from a wide range of activities and sectors. Through the analysis of the various existing and expected climate policies, the possible evolution of the concentration of greenhouse gas emissions, as well as energy trends, the Group seeks to identify potential vulnerabilities in its operations and take targeted measures to mitigate upcoming climate risks. In this way, it enhances its ability to anticipate and adapt to changing environmental conditions.

In particular, the Group adopts a proactive attitude with regard to climate-related risks, cooperates with the authorities and implements integrated plans and certified business continuity systems according to ISO 22301:2019. This includes dealing with risks such as fires, floods, heatwaves, and technological challenges.

For more information on Health and Safety and Environmental Emergency Plans, see the [Society](#) Chapter and the [Governance](#) Chapter respectively.

In addition, the Group has adopted an Environmental & Energy Policy and implements certified Environmental and Energy Management Systems as analyzed in this chapter.





The following table presents the Group’s resilience in terms of the risks it is expected to face in the short, medium and long term.

Overview of the Group’s resilience in the short, medium and long term

Risk	Probability	Severity of Consequences	Adaptability	Strategy Resilience		
				2030	2040	2050
Floods	Moderate	Moderate	Moderate	High	High	High
Fires	Moderate	Moderate	Moderate	High	High	High
Heat waves	Moderate	Moderate	Moderate	High	High	High
Technology	Likely	Minimum	Moderate	High	High	Moderate
Displayed Regulations	Likely	Severe	Moderate	High	Moderate	Moderate
Regulatory and Legal Framework	Almost certain	Severe	Moderate	High	Moderate	Moderate
Fame	Likely	Minimum	Moderate	High	High	Moderate
Market	Almost certain	Severe	Moderate	High	High	Moderate

Severity of Consequences

Minimum Moderate Severe Catastrophic

Adaptability

Low Moderate High

Probability

Rare Unlikely Moderate Likely Almost certain

Strategy Resilience

Low Moderate High



Risk management

ELLAKTOR Group adopts an integrated approach to the management of climate-related risks, aligned with the TCFD recommendations, while implementing a robust framework for the assessment of physical and transition risks, using the internationally recognized standard ISO 14090 «Adaptation to climate change — Principles, requirements and guidelines».

A. The Group’s procedures for the identification and assessment of climate-related risks

The Group records climate risks in the Group’s risk register and categorizes them into physical and transition risks and leverages comprehensive assessments and scenario design to ensure long-term sustainability and resilience. At the same time, it has a detailed process for risk analysis, the assessment of the materiality of risks and adaptation measures, using the guidelines and requirements of the international standard ISO 14090:2019, ensuring the systematic identification of climate changes that are expected to affect the locations where the Group operates and the diagnostic assessment of the vulnerability of its activities to these changes.

The Group complies with Greek legislation and EU directives, incorporating environmental metrics into its performance monitoring. In addition, the Board of Directors ensures the smooth operation of the Group, through the integration of the Internal Audit System (IAS).

B. The Group’s procedures for the management of climate-related risks

The risks arising from the impacts of climate change and the transition to a zero-carbon future are expected to affect the Group’s companies at various stages of its operation. For this purpose, the Group implements detailed procedures for their management.

As part of its compliance with the criteria set out in the Taxonomy Regulation on adaptation to climate change, the Group carries out a detailed assessment of the physical climate risks that are important for its operations. This assessment is based on the best practices and guiding principles of the Delegated Climate Act.

In addition, the Group recognizes and conducts a detailed assessment of climate risks and their potential economic impact. This includes the development of a climate risk management programme that includes key assessment criteria as follows:

■ Analysis of the Group’s activities

The first step is to thoroughly analyze the Group’s activities in order to identify physical and transition risks that could affect the performance of its financial activities over their expected duration.

■ Probability assessment

Once the climatic risks that are expected to affect the Group’s activities have been identified, the likelihood of their occurrence is subsequently assessed. This step aims to understand the potential frequency and severity of risks.

■ Determination of significance

At this stage, an extensive assessment is carried out to determine the degree of significance of the natural climate risks for the activities. This assessment addresses vulnerabilities associated with the identified risks.

### ■ Assessment of adaptation measures

The next step concerns the assessment of the Group's adaptive capacity, through the measures it has taken to mitigate the identified natural climate risks. In addition, during the assessment process, the economic impact of the risks and opportunities identified is examined. For the assessment of the economic impact, a dedicated tool is used to calculate the financial impact of potential climate risks.

#### C. Processes for identifying, assessing and managing climate-related risks that are integrated into the Group's overall risk management.

Climate risk management is seamlessly integrated into the broader risk management framework, with adjustments that include improvements in systems management. Climate-related factors are strategically placed in financial planning, recognizing their influence on immediate costs, strategic decisions, and access to capital.

The Group's upcoming 2024 Sustainability Report, which will comply with the CSRD Directive, will detail the Group's approach to biodiversity and ecosystems, describing the economic allocations for habitat conservation, taking into account the results of the materiality assessment it will carry out under the new Directive. Financial planning includes scenario analysis and stress testing for overall financial resilience.



### Metrics & Targets

The metric and targets underline the critical importance of using clear and well-documented environmental indicators. These indicators serve as a framework for quantifying, monitoring and managing the environmental impact of the Group's activities. ELLAKTOR Group, in accordance with international standards, systematically records and monitors environmental performance indicators, such as energy consumption, water use and the production of renewable energy sources.

#### A. Metrics used by the Group to assess climate-related risks and opportunities, in accordance with its risk management strategy and process

The Group places great emphasis on sustainable practices, including the adoption of certified energy management systems and the focus on Renewable Energy Sources (RES). Circular economy practices, water management strategies and internal carbon pricing are an integral part of the Group's commitment to environmental stewardship.

#### B. Greenhouse gas (GHG) emissions Scope 1, Scope 2, Scope 3, as well as the related risks

The «Metrics and Targets» chapter of the analytical report also outlines the Group's efforts to capture and reduce its carbon footprint, including Scope 1, 2 and 3 emissions. It is worth noting that in 2023 there will be a reduction in greenhouse gas emissions (Scope 1 & 2 of the Group), by 27% compared to 2021. The

Group uses internationally recognized methodologies for the calculation of emissions and the internal pricing of carbon dioxide emissions, preparing for possible future regulations.

#### C. The objectives used by the Group to manage climate-related risks and opportunities and performance against the targets

ELLAKTOR Group sets ambitious targets for 2030, focusing on reducing direct and indirect emissions, optimizing energy efficiency and switching to renewable energy sources. The Group has set a target of a 42% reduction in Scope 1 & 2 emissions by 2030 and a 25% reduction in Scope 3 indirect emissions by 2030, which are considered by the Group to be in line with the SBTi methodology, and in 2023, the Group committed for the first time to set science-based emission reduction targets in line with its Science Based Targets (SBTi) initiative. Also, the Group is committed to proper waste management, aiming at a significant reduction in landfill disposal and ultimately achieving a 100% diversion of waste from landfill by 2028, and is committed to a 15% reduction in water withdrawal in its projects by 2030.



# 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 apply it fairly to all Europeans.

ELLAKTOR Group has placed the circular economy at the core of its strategy, among other sustainable practices, as the transition from the linear to the circular model strengthens its path towards sustainable growth and prosperity, creating long-term value for the economy, society and the environment.

Recognizing the importance of the circular economy, as well as the significant challenges in the transition process, the Group adopts practices to transform the linear production model into a circular one, seeking to limit the use of material resources and waste generation and aiming to preserve resources in the product life cycle with the highest possible value and for as long as possible.

design, construction and operation of modern waste treatment units, biological waste treatment and energy utilization of biogas in Landfills.

The company’s units apply Best Available Techniques (BAT) at all stages of waste treatment and management, with the aim of enhancing recycling, producing useful by-products, minimizing carbon dioxide and methane emissions, minimizing residue destined for landfill, diverting biodegradable fraction from landfill, and ultimately making a significant contribution to the transition to a circular economy.

More specifically, in 2023, waste treatment plants, in which companies in the Environment segment participate, managed 816,199 tonnes of waste compared to 949,350 tonnes in 2022, of which 807,940 tonnes of non-hazardous waste (municipal waste) and 8,259 tonnes of hazardous waste (hospital/infectious waste). The management method of the waste output of these units is presented below.

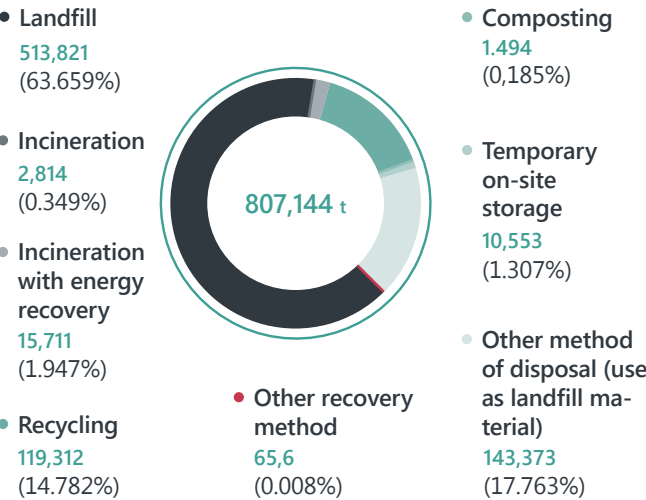


## ENVIRONMENT

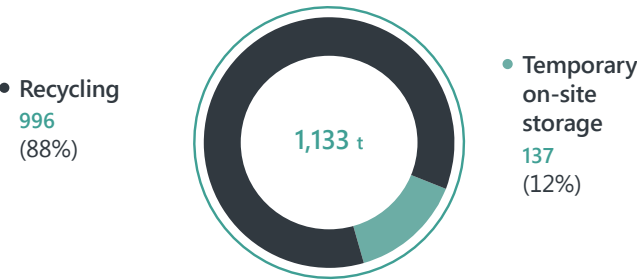
### Solid Waste Treatment Plants

The activity of the Group, and specifically of the Environment segment, is inextricably linked to the circular economy, as through the company HELECTOR, it is active in the field of waste management. HELECTOR is one of the largest companies with know-how in the Waste Management sector in Southeast Europe, while it is active in the entire spectrum of the

### Management methods for output hazardous (t)



### Management methods for output non-hazardous waste (t)



*Note: The difference in the amount of input and output waste (hazardous and non-hazardous) is due to the treatment method, the moisture loss suffered by the waste, as well as quantities of stored waste from the previous year that were treated within 2023 and quantities of new incoming waste that were temporarily stored at the end of the year pending its management.*

With regard to the transport of hazardous waste (e.g. hospital waste), companies in the Environment segment have the necessary permits and take the best possible preventive measures to protect public health and the environment. In 2023, they transported a total of 8,259 tonnes of hospital waste.

With regard to the Management of Hazardous Waste of Sanitary Units (EAYM), the Group manages, through EPALTHEA S.A., the only Incinerator of Hazardous Waste of Sanitary Units in Greece, at the Landfill of Ano Liosia, which has been operating since 2002. In 2023, the plant received 4,380 tonnes of hazardous waste from health facilities (hospitals, clinics, microbiological centers, private practices, dental practices, veterinary clinics and pharmaceutical warehouses), applying advanced technologies and Best Available Techniques.

In addition, the Group, through its subsidiary company APOSTERILOSI, manages the Pure Infectious Hazardous Waste (NEA) and Mixed Hazardous Waste (WEEE) and Mixed Hazardous Waste (WEEE) Storage Unit of Health Units in the Second Industrial Area of Volos. Specifically, in 2023, the plant treated 3,879 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, among others:

- The Integrated Waste Management System (IACS) in Western Macedonia, with a capacity of 120,000 tonnes per year, which is the first PPP project for Waste Management.
- The operation and maintenance of the Mechanical Recycling and Composting Plant (Green EMA) in Ano Liosia with a capacity of 350,000 tonnes per year. The Green EMA is currently the only municipal solid waste treatment plant operating in Attica and which manages about 1/6 of all waste produced throughout the Region.
- The Mechanical Biological Treatment Plant in Larnaca, Cyprus, which uses optical separation technology for the recovery of recyclable waste from mixed waste, with a capacity of 190,000 tonnes/year.
- The Hazardous Medical Waste Incineration Unit, which holds the only



license in Greece for the management of hazardous medical waste by the method of heat treatment (incineration) with a capacity of up to 10,950 tonnes per year, thus covering all the needs of the country's Health Units (approximately 1,800 units of health interest). The unit contributes to the safeguarding of public health and the effective and proper management of hazardous waste. In addition, part of the thermal energy produced is reused by the installation, with the aim of reducing the overall energy requirements. In 2022, the new contract for the upgrade of the Incinerator and its conversion into a Waste to Energy plant was signed.

- The Pure Infectious Waste Hazardous Waste Sterilization Unit (NPW) and Mixed Hazardous Waste (NPW) and Storage of Mixed Hazardous Waste (NPW) of Health Units, which has a capacity of 18 tonnes per day and is fed by a privately-owned collection and transport fleet of NPWs and the cooperating companies that serve the Health Units.
- Two Recyclable Material Sorting Centers (KDAY) with a total capacity of more than 175,000 tonnes per year.

Through the practices implemented in the projects, high rates of reuse and recycling are achieved, preserving the value of natural resources, raw materials and products.

Indicatively, in 2023, the following were achieved:

- Utilization of 26,593 m<sup>3</sup> of treated wastewater from the leachate treatment plant of the IACS of Western Macedonia, to cover operational needs, such as cooling of the biological treatment plant, washing of the waste treatment plant (WTP) and irrigation.
- The subsidiary company Solid Waste Recycling (ASA RECYCLE), which processes blue bin and glass waste, achieved a recyclable waste recovery rate of more than 60% in all 3 of its units.
- At the EMAK (Mechanical Recycling Plant) of Ano Liosia, 949 tonnes of compost from bio-organic waste were produced, which was disposed of packaged or in bulk at the request of the Special Inter-Level Association of the Prefecture of Attica (EDSNA), which is the owner of the project. This compost meets the limits of the Decision (EU) 2015/2099

on establishing ecological criteria for the award of the EU ecolabel to soil improvers.

- Production of SRF (solid recovered fuel) of a total quantity of 6,270 tonnes at the EMAK plant in Ano Liosia.
- Sorting and recycling of mixed waste and redistribution of recyclable materials to producers/recyclers of raw materials. In 2023, the IACS of Western Macedonia treated 104,726 tonnes of waste, of which 14% was recovered. In total, 30% of the incoming mixed waste coming from the Region of Western Macedonia was either reused for the needs of the installation as compost (as a coating material for the landfill), or as a quarry restoration material, or was disposed of as a recyclable material.

It is worth mentioning that the subsidiaries of the Environment segment, such as ASA RECYCLE, enter into cooperation relationships with subsidiaries of other sectors of the Group, for the receipt and management of waste such as mixed packaging resulting from the latter in order to extend their life expectancy, in the context of strengthening industrial symbiosis.



## WASTEWATER TREATMENT PLANTS

### Waste Management of Wastewater Treatment Plants

In the Environment segment, projects of great importance for their contribution to the protection of the soil, the subsoil, the groundwater and biodiversity are the leachate treatment plants resulting from the operation of landfills. The two main units, the LTP (Leachate Treatment Unit) of Mavrorachi and the LTP of Liosion – Fyli aim to ensure that all the leachate treatment facilities adequately serve the needs of the landfills, achieving the required discharge qualities, which should be in accordance with what is specified in the environmental terms of the projects. These Leachate Treatment Units are of the utmost importance infrastructure in an Integrated Waste Management facility, as their operation makes a landfill environmentally acceptable in terms of leachate management, contributing to the prevention of groundwater pollution, but also to the saving of water through its reuse, after treatment.

More specifically, even more modern equipment for leachate management will be installed at the Mavrorachi LTP, combining the Ultrafiltration (UF) and Reverse Osmosis (RO) methods. Upon completion of the projects, the contractor will have full and exclusive responsibility for achieving the required treatment yields in terms of final effluents and treated sludge, which must be in accordance with what is specified in the project's environmental permit.

At the Liosia – Fyli LTP, Leachate Treatment Units were designed and constructed with a total final treatment capacity of 600 m<sup>3</sup> leachate per day in reverse osmosis units and which were put into operation in October 2005 and June 2008 respectively. The units include leachate pumping stations and ventilated balancing tanks, reverse osmosis units for the recovery of water suitable for irrigation and units evaporation system for further water recovery and a significant reduction in the volume of condensed leachates. The exhaust units utilize the hot water from the cooling circuit of the adjacent biogas engines.

In June 2023, the contract for the Provision of Services for the Operation, Maintenance and Capacity Increase of Leachate Treatment Units of the O.E.D.A.



West Attica was signed between the Consortium LTP OEDA of West Attica and the Special Inter-Grade Association of the Prefecture of Attica (E.D.S.N.A.). The object concerns the increase of their treatment capacity from 700m3/day to 1,300 m3/day and includes the following new units:

- **Biological Treatment with Ultrafiltration Membrane System**
- **Reverse Osmosis Units**
- **Ultra-High Pressure Reverse Osmosis Units**
- **Exhaust Units**
- **Bio-sludge treatment plants**
- **Brine Processing Unit**
- **Accompanying works**

The project is important, as through the above contract, the highly polluting leachate resulting from the landfills of Fyli and Liosia is treated within the territory of the OEDA, taking into account at the same time the increasing quantities of leachate production of landfills.



422,731 m³

total amount of wastewater entered the plants for treatment



242,349 m³

total amount of treated water reused

### SOLID WASTE MANAGEMENT

The Group’s waste management program, both hazardous and non-hazardous, primarily aims to reduce the amount produced and the degree of risk of waste, but also to improve environmental performance indicators by preventing as much as possible from landfill.

In this context, actions are implemented taking into account the hierarchy in waste management, with emphasis on preventing its generation and preparing it for recycling and reuse. The promotion of recovery methods (R) versus disposal methods (D) is carried out through waste sorting processes at source, which include training and awareness among workers, setting up appropriate infrastructure, working with appropriate and approved reception units and monitoring overall performance, resulting in a contribution to the circular economy and the protection of ecosystems.

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

The collection, transport and disposal of waste is carried out by licensed bodies registered in the Electronic Waste Register (EWR) of the Ministry of Environment and Energy and is made available to licensed final receivers. The Group keeps a record of all the 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, batteries, waste lu-

bricating oils, used vehicle tires, etc., is managed through approved alternative management systems.

Any hazardous waste that arises is temporarily stored within projects, in specially designed areas (covered areas with a waterproof floor and a perimeter safety barrier), until it is made available for utilization or disposal through collectors registered with the EWR, to the final licensed receivers.

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

Accordingly, companies in the Concessions segment recycle all kinds of waste resulting from the operation of the motorway itself (waste lubricating oils, accumulators, iron spare parts/scrap, green waste, etc.). In particular, on Attiki Odos during 2023, the project road surface replacement program began, so the waste management of excavation construction and demolition waste (ECDW) was also included in the waste management program.

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



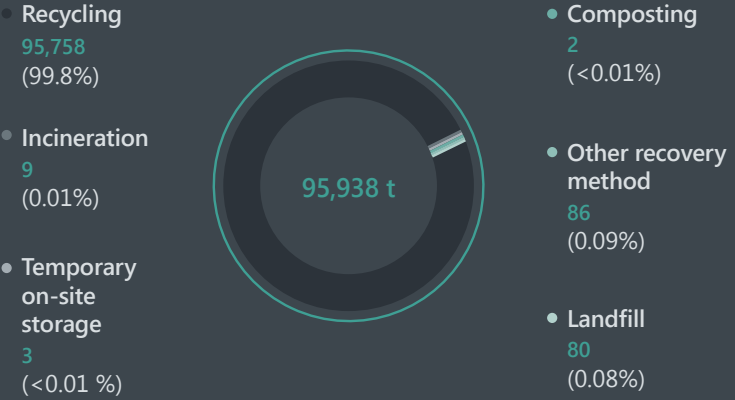
### Management of Solid Waste generated by Group’s operation

From all waste (hazardous and non-hazardous) generated by the operation of the Group’s companies in the facilities/projects under its own management, 97% was utilized in recovery methods (R), recording an increase of 8 percentage points compared to 2022, already achieving the medium-term target set for the diversion from landfill at 80%.

More specifically, 95,847 tonnes of non-hazardous waste and 3,739 tonnes of hazardous waste were disposed of for recovery (R) and were not sent to landfill. The way in which all waste from the Group’s operation is managed is reflected in the following graphs, while the breakdown of this waste by stream is reflected in the tables listed in the [Annex](#).

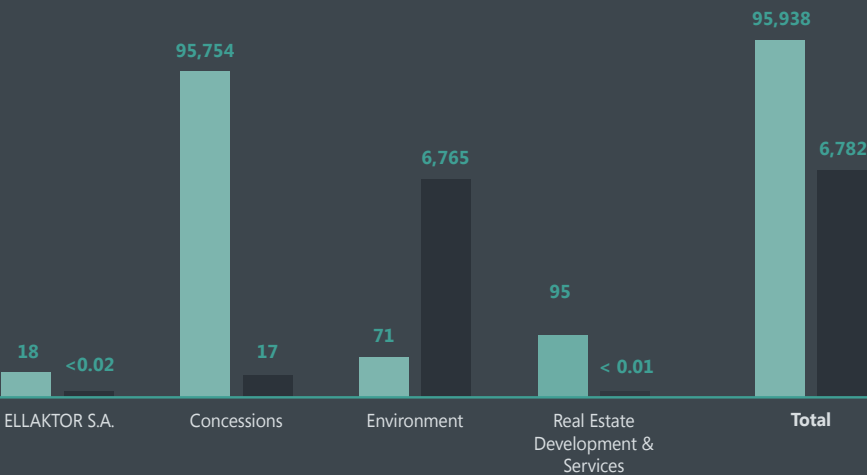


Non-Hazardous Waste Management Methods (t)

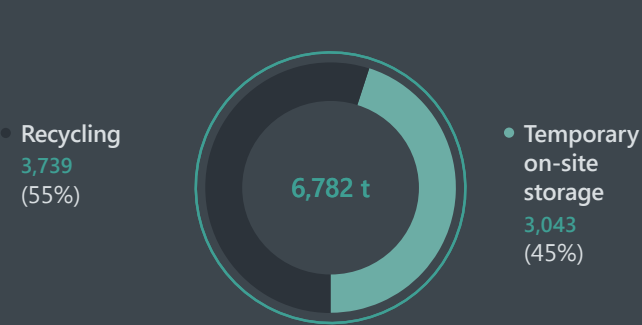


*Note: the large increase in the amount of non-hazardous waste compared to 2022 is due to the quantities of ECSC resulting from the road surface replacement program of the ATTIKI ODOS project.*

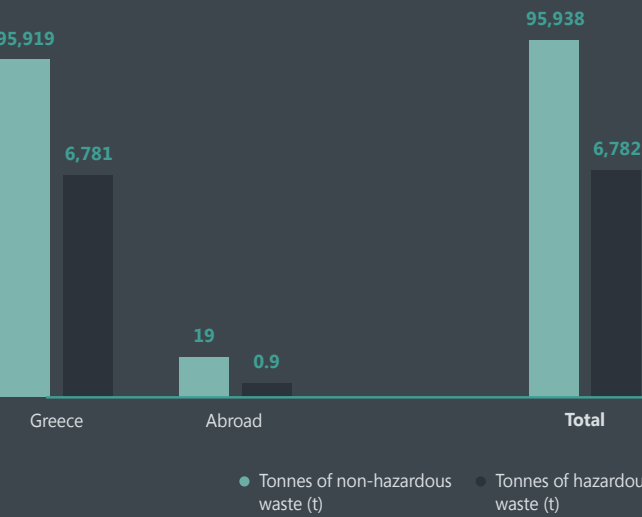
Production of hazardous and non-hazardous waste per segment



Hazardous Waste Management Methods (t)



Waste by country



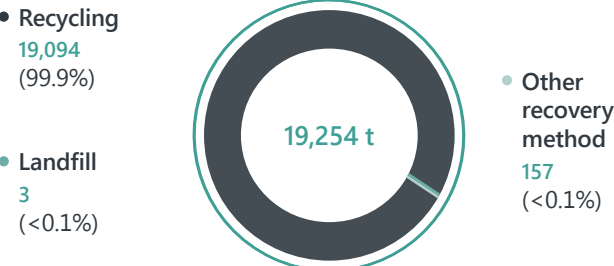
Management of Third-Party Solid Waste

WASTE MANAGED BY THE GROUP'S COMPANIES AND SUBCONTRACTORS

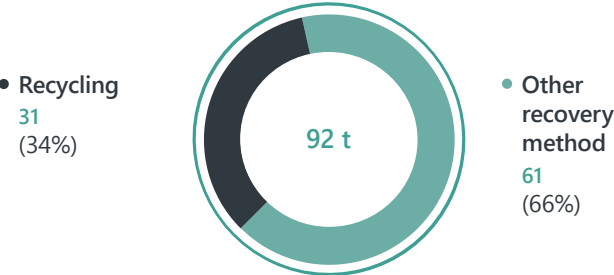
In addition to the waste resulting from the operation of its companies, the Group also manages quantities of waste generated during the construction, operation and maintenance of projects on behalf of third parties. From the total waste (hazardous and non-hazardous) managed by the Group or its subcontractors on behalf of third parties, 99.9% was managed with recovery methods (R).

The management of all waste managed by the Group's companies and subcontractors is reflected in the following graphs, while the breakdown of this waste per stream is reflected in the tables listed in the [Annex](#).

Non-Hazardous Waste Management Methods (t)



Hazardous Waste Management Methods (t)





MANAGEMENT OF NATURAL RESOURCES AND RAW MATERIALS

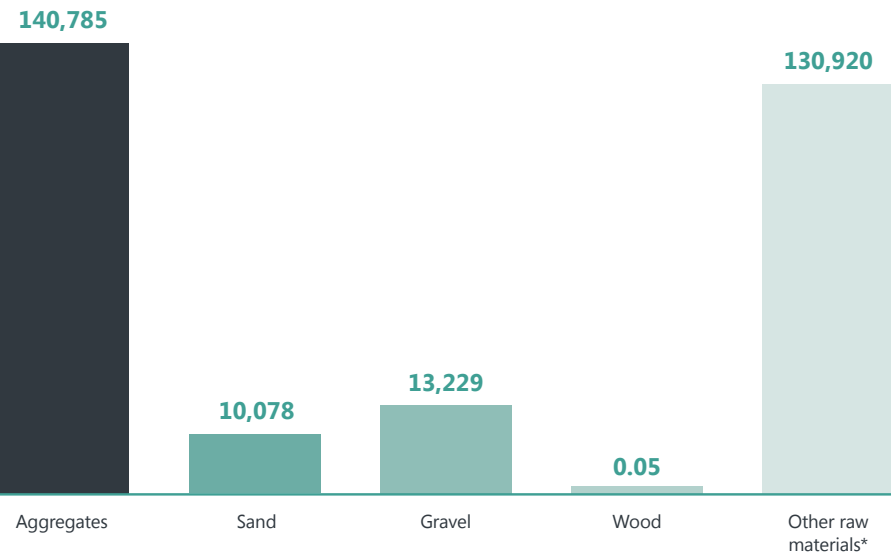
ELLAKTOR Group has committed itself through its Environment & Energy Policy, to the effective management and conservation of raw materials and natural resources and plans actions to achieve sustainable management and adequate use of them by implementing relevant procedures through the Environmental Management Systems.

Through the Environment segment, circular economy practices are implemented and rational waste management, separation and utilization of recyclable materials, production of alternative fuels and energy utilization of biogas produced in landfills are achieved. In this way, the waste produced is reduced, its recycling and reuse is enhanced, and raw materials and materials are saved.

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

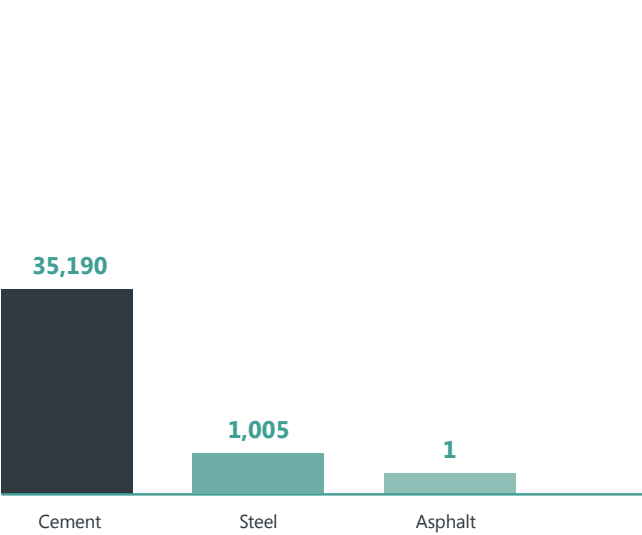
The following charts show the consumption of key raw materials and products for the year 2023.

Total quantity of basic raw materials: 295,012 t



\*soil from excavations

Products: 36,196 t



Water management

The water uses by the Group's companies mainly concern the needs of irrigation, cooling, hygiene, water supply, firefighting, washing (road surface and/or vehicles), water spraying and waste treatment.

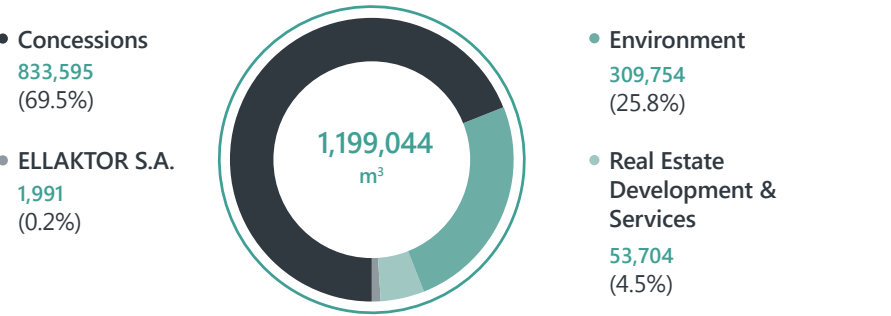
By implementing Environmental Management Systems in accordance with the ISO 14001 standard, the Group's projects implement procedures and take measures to reduce water use and reuse it, where possible, with the aim of achieving maximum savings. Indicatively, the practices applied in the projects are mentioned, such as the installation of meters and the control of any leaks, the implementation of approved irrigation studies, the regulation of irrigation by central electronic systems programmed according to climatic conditions, the reuse of wasteter from biological treatment, the periodic control of quality, chemical and microbiological parameters of water quality.

The total water withdrawal in 2023 at Group level amounted to 1,199 ML, of which 14% was water that was recycled or reused. At the headquarters, water consumption was 0.6 m3/m2, reduced by 8% compared to 2022.

In 2023, there was a decrease in water withdrawal per turnover (m3/thousand €) in the Concessions segment, which has the largest contribution to the Group as a whole, as shown in the following chart which depicts the continuous effort to reduce and protect this natural resource.

In particular, water withdrawal is depicted below segment, from which it emerges that the main use of water concerns the Concessions segment.

Water withdrawal per segment (m³)

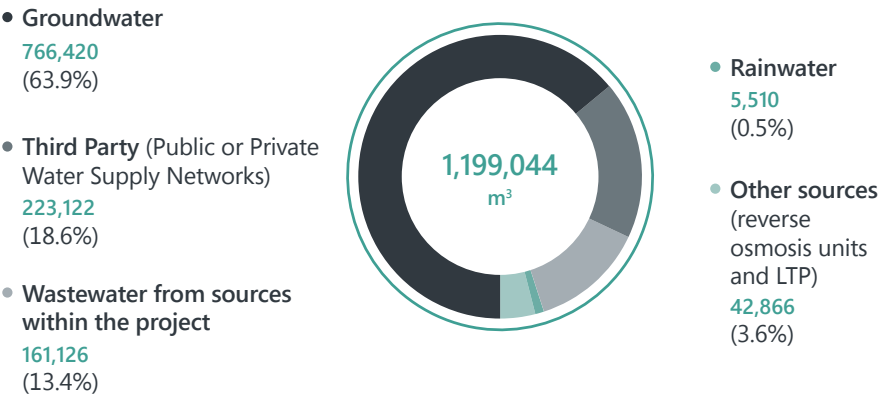


Special water withdrawal per segment (m³/thousand. €)



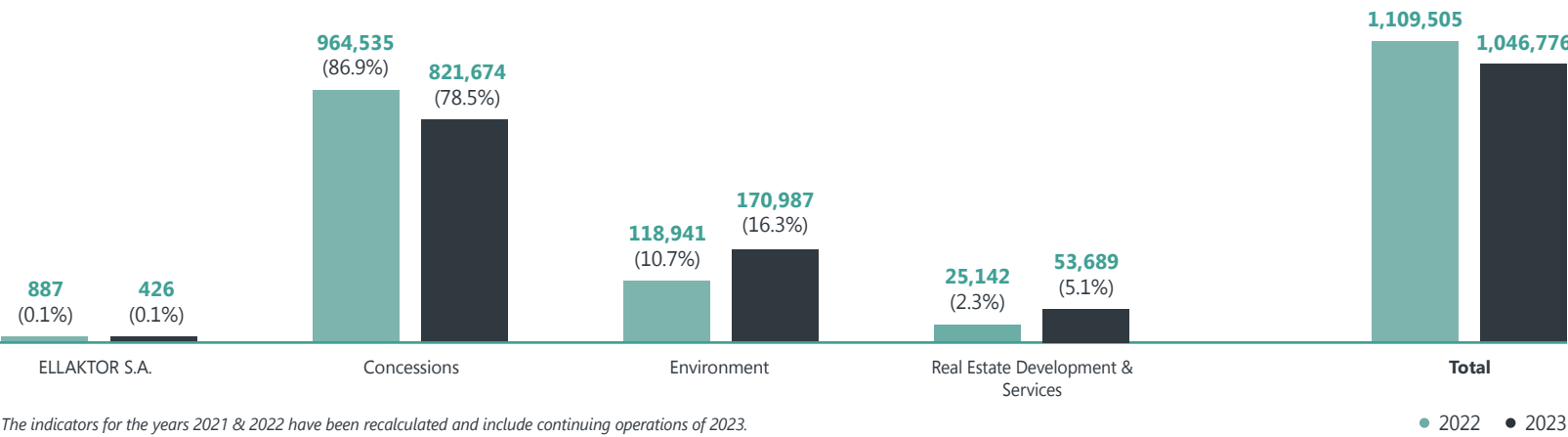
The indicators for the years 2021 & 2022 have been recalculated and include continuing operations of 2023.

Water withdrawal per source (m³)



The total water consumption from the Group's activities for 2023 amounted to 1,046,776 m3 and is broken down by sector of activity in the following chart:

Water consumption by segment (m³)



Total water discharges from the Group's activities for 2023 amounted to 152,268 m³ and the discharge per recipient is analyzed in the [Annex](#).

In the **Concessions segment**, water-saving practices are applied, such as irrigation planning for maximum efficiency (irrigation at night), immediate repair of damages - leaks, systematic network maintenance, reuse of water from biological treatment plants by 11%, increased by 6 percentage points compared to 2022, for limited irrigation at Motorway Service Stations.

In particular, in MOREAS, the use of water mainly concerns the coverage of the needs for irrigation, firefighting and water supply. The main use of water concerns the coverage of the irrigation needs of the planting of the islet, the supports and the junctions of the Motorway which change depending on the weather conditions, the growth and the type of plants. In order to monitor the amount of water withdrawn, a non-zeroing volumetric water meter has been installed in each borehole, the readings of which are recorded on a monthly basis. These indications are compared with corresponding indications of previous years in order to identify any unexpected changes. The monthly monitoring of consumption, combined with the regular visual inspection and maintenance of the irrigation network, ensure the minimization of losses, consequence of leaks. Furthermore, at the pumping stations from which the single water supply network of the motorway is supplied, there are pressure gauges installed, which provide real-time, to the Control and Maintenance Center, information on any pressure losses or equivalent indication of the existence of any leaks. In addition, on an annual basis and in each borehole, laboratory analyses are carried out to check for any changes in the chemical characteristics of the groundwater and to detect any trends in its degradation. Finally, the reuse of

the treated effluent of the Wastewater Treatment Plants for irrigation of fenced and inaccessible green spaces, contributes to water saving.

Accordingly, Attiki Odos complies with all the obligations arising from the permits of the water boreholes (which are used for the irrigation needs of the project), the water supply needs are covered by the city's network, while at the same time the obligations arising from the licenses concerning the project's wastewater treatment plants are complied with.

At Alimos Marina there is continuous training, information and awareness of employees, as well as marina users regarding water conservation. Also, the rational management of water and the recording of withdrawal per source is promoted, while its reuse is implemented where possible, in accordance with environmental terms.

In the **Environment segment**, HELECTOR consistently implements measures for saving and rational management of water in its Waste Treatment Plants. Specifically, through the Leachate and Wastewater Treatment Plants, it treats the leachate resulting from their operation and reuses it during the biological treatment of waste and/or for irrigation of land of its facilities. Liquid waste produced by the various processes of companies in the sector is divided into industrial waste and municipal wastewater. Due to the different pollutant load of industrial waste and municipal wastewater, different treatment techniques are used before being disposed of to the final recipient, in accordance with the environmental terms of the facilities. At the same time, frequent analyses are carried out on the quality of wastewater resulting from the operation of waste management facilities (landfills, wastewater treatment plants, etc.).

In the **Real Estate Development & Services segment** and specifically in the Smart Park Commercial Park, through the installation of biological treatment, the treated urban wastewater resulting from the operation of the commercial park, is utilized for underground irrigation of the park's common green spaces, through a network of underground pipes, resulting in 49% of the water being reused. In all parts of the commercial park that are irrigated with treated water, appropriate signage has been installed.



# Air and Soil Quality

## AIR POLLUTANTS AND AIR QUALITY

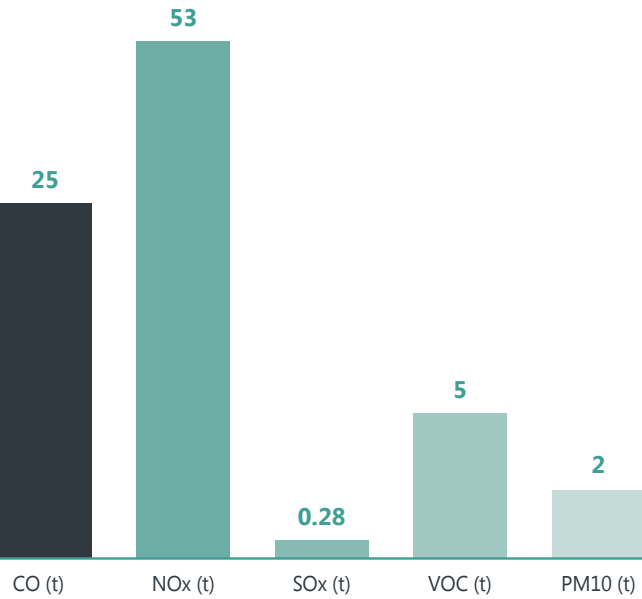
The Group’s main priority is to ensure the quality of the atmosphere in and around the area of its projects.

The Group’s projects have procedures in place to prevent air pollution during their construction and operation. Indicatively, the measures taken in the projects in order to comply with legislation and environmental terms regarding air emission limits are the application of Best Available Techniques (BAT) at source to reduce air emissions, the installation and operation of appropriate anti-pollution equipment and techniques where required, such as filters (bag filters, electrostatic, biofilters), cyclones and scrubbers for the waste gases of certain units, the implementation of fuel-saving practices, the reduction of electricity consumption, the covering of material conveyor belts, the coverage of outdoor material deposition areas, water spraying of traffic routes and material or waste piles, the coverage of trucks transporting materials, the reduction of the storage time of materials and the height of piles to avoid dust dispersion, the systematic maintenance of equipment, machinery and vehicles, the prudent use of equipment and the avoidance of unnecessary movements.

In particular, the biogas energy utilization units of the Environment segment are projects of strategic importance for the energy and environmental improvement of regional landfills. With the biogas produced by landfills that feeds the stations, renewable electricity is produced, while the release of greenhouse gases (specifically, CH4 methane) is avoided, significantly improving the air quality of these areas.

In this context, and for the monitoring of other air emissions, CO, NOx, SOx, NMVOC, PM10 emissions resulting from direct energy consumption (natural gas, diesel for mechanical equipment, diesel for mobile equipment, gasoline, LPG and CNG) are recorded and calculated. Emission factors from the EMEP/EEA Air Pollutant Emission Inventory Guidebook 2023 were used for the calculations.

Other air emissions



It is noted that from the Environment segment, the emissions of dioxins and furans recorded were extremely low (0.00146 g PCDDs/Fs).



## ENVIRONMENT

In particular, in the Group’s Environment segment, the best available techniques for combustion are applied and continuous controls are carried out in order to minimize air emissions.

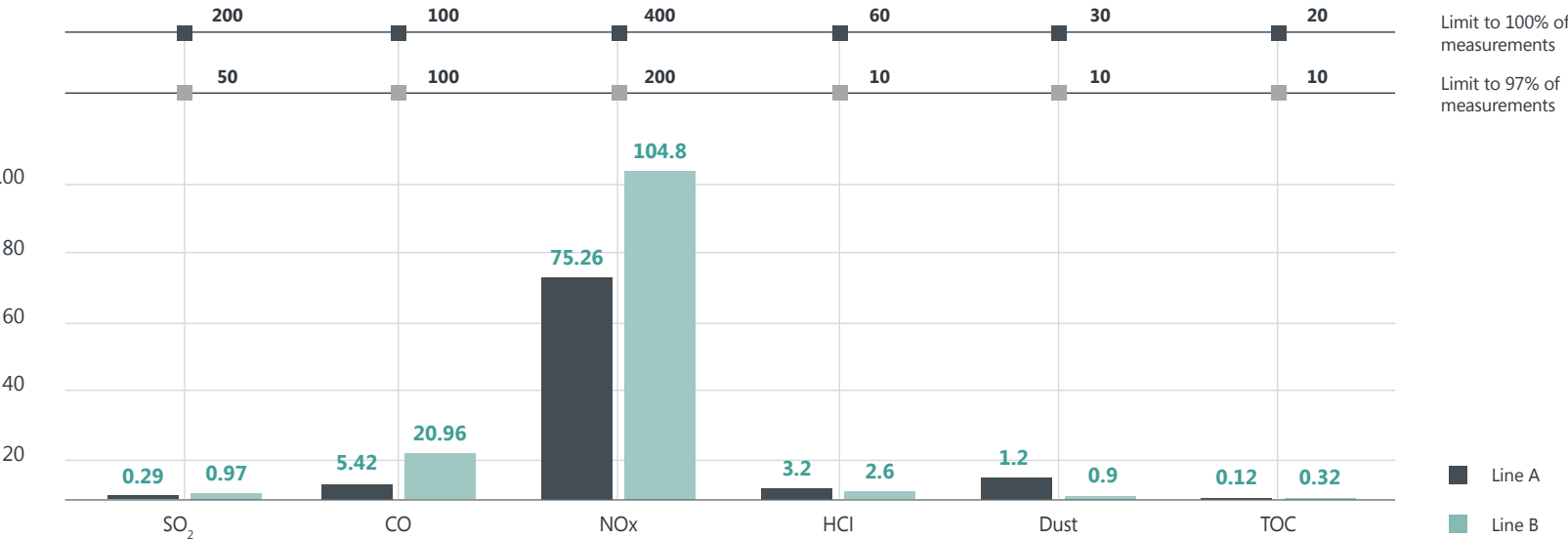
**HELECTOR: Monitoring of the air emissions of the hospital waste incineration unit of Ano Liosia.**

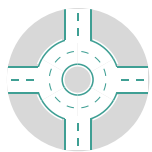
HELECTOR implements a plan for monitoring air emissions of the hospital waste incineration unit of Ano

Liosia, in accordance with the requirements of the relevant legislation. The aim is the technical evaluation of the performance of the combustion parameters, as well as the continuous and legal operation of the incineration unit. The plan concerns the online analytical systems for monitoring parameters and air pollutants and the periodic monitoring of concentrations of air pollutants from externally certified laboratories.

The control of air emissions is carried out using modern measurement equipment. The measurement program covers both point and diffuse emissions on a continuous and periodic basis. The analyzers are connected to the factory’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 on the two parallel incineration lines A and B for 2023, compared to the relevant limits set by the legislation (control of limits at 100% and 97% of measurements).





## CONCESSIONS

Air pollution levels on Attiki Odos are monitored by 8 stations, installed along the motorway, which measure all air pollutants determined by the relevant European Legislation (NO<sub>2</sub>, CO, benzene and particulate matter PM<sub>10</sub> and PM<sub>2.5</sub>) on an hourly basis. The evaluation of the results of the measurements of the levels of air pollutants in relation to the permitted limits is carried out by an external specialized partner.

MOREAS, in accordance with the provisions of the Concession Agreement and the relevant Environmental Terms, has installed 3 Permanent Stations for the measurement of air pollution and meteorological parameters along the motorway in locations near or within the boundaries of settlements, through which continuous and uninterrupted measurement and recording of CO, NO<sub>x</sub> pollutants is carried out, SO<sub>2</sub>, BTX and particulate matter. The results of the measurements are sent on a quarterly basis to the competent authorities of the Ministry of Environment and Energy.

At Alimos Marina, in order to ensure the protection of the atmosphere, an air emissions monitoring program is implemented and controls and measurements of air pollutants are carried out in accordance with the Decision on the Approval of Environmental Terms. In 2023, 4 measurements were carried out by the operator of the Alimos Marina with an external partner. From the results of the sample analyses for 2023, it is observed that all the parameters examined were within the defined legislative limits and no exceedances were recorded.

## MEASURES TO PREVENT SOIL, SUBSOIL AND WATER POLLUTION

In the Group's projects, specific procedures are followed and an integrated environmental management program is implemented with the aim of pre-

venting soil, subsoil and water pollution in the areas where it operates.

More specifically, as it has been mentioned, a waste management program is implemented with proper storage of waste by sorting at source, in accordance with the specifications of the legislation, and regular disposal of waste is carried out to the licensed final receivers for further management. In particular, the storage of hazardous waste is carried out in suitable containers in specially designated areas, protected from weather conditions, with a suitable waterproof safety basin, having the minimum required distances from sensitive points regarding the risk of groundwater pollution. In addition, the maintenance of the equipment and machinery is carried out in specially designated areas to protect the soil against leaks.

In addition, special contingency plans have been developed in the Group's projects, which are activated in case of an event (e.g. waste leakage) and the projects have appropriate equipment, such as absorbents, in order to limit as much as possible or avoid any pollution to the adjacent recipients. Preparedness exercises are regularly carried out for these projects.

In the Concessions segment of the MOREA project, the following are additionally applied:

- treatment of municipal wastewater in Wastewater Treatment Plants (WWTPs) in accordance with the requirements of the Environmental Terms and reuse of the treated effluent for irrigation of designated fenced green spaces,
- implementation of a sampling and analysis program, in addition to those provided for by the applicable legislation, by contracted and appropriately certified laboratories for the monitoring

of the quality of the effluent of treated wastewater and monitoring of the quality characteristics of the irrigated areas, through soil sampling and analysis,

- a system for the collection of liquid waste that may occur inside the tunnels in pollutant retention tanks;
- collection of municipal waste along the motorway on a regular basis and its management in accordance with the relevant legislation.

At Alimos Marina project, a sea water quality measurement program is implemented, with a frequency every two months, in a grid of 6 points within the tourist port, monitoring and recording physicochemical parameters, microbiological load, metals and any petroleum residues, in collaboration with a specialized partner and according to the environmental terms of the project.

In the Environment segment, important contribution to the prevention of soil, underground and water pollution has the construction of watertight reception and landfill areas (for waste and residues) and the collection of leachates, the application of recycling and composting methods of municipal waste, the composting of biowaste and the production of secondary fuels from municipal waste, the operation of liquid waste/leachate systems of the facilities and biological/chemical treatment plants and reverse osmosis plants.

Finally, the implementation of continuous training actions for employees on good environmental management practices, especially in positions related to the production of hazardous waste, plays an important role in the above.





# Biodiversity & Ecosystem Protection

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

The Group takes into account the particular environmental requirements of those projects or activities in areas that are within or near sensitive areas and monitors the protected species (flora and fauna) as they are referred to in the approved environmental conditions.

Indicative measures taken are:

- Location of the projects at a sufficient distance from habitats, e.g. clusters of shrubs and trees, broad-leaved or coniferous forests, streams, lakes, buildings (in use or abandoned), when suitable for shelters.
- Recording and mapping of land uses in the wider construction area of the project and identification of areas with any protected species (flora and fauna) and species that are endangered.
- Conduct an inspection for the presence of wildlife in sections with flooded ditches and at river crossings before the start of work.
- Non-interference with river arrangements.
- Installation of appropriate fencing to protect the local fauna and flora and special fencing to prevent wild and stray animals from entering the highway.
- Limitation of vegetation damage and intervention in the landscape to the absolutely necessary area.
- Execution of reforestation of corresponding areas in the areas of intervention of the projects, after the completion of the works.

## BIODIVERSITY INDICATORS

2

Business premises owned, leased or managed in or adjacent to protected and/or high-value biodiversity areas

185,000 m²

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

- Collection and storage of excavations and soil layers containing plant land, in order to be reused in environmental restoration works.
- Avoid activities, especially during sensitive periods, such as nesting or breeding birds.
- Implementation of bird monitoring programs in all phases of construction of projects in Natura areas.
- Immediate transfer to a local care center in case of detection of an injured animal.

According to the International Union for Conservation of Nature (IUCN) Red List of Threatened Species, the species recorded in the Group’s activities for 2023 are depicted in the table below:

Total number Red List of Endangered Species of the International Union for Conservation of Nature	2023
Critically endangered species	0
Endangered species	0
Vulnerable species	0
Near Threatened Species	0
Least Concern	4





## CONCESSIONS

According to the revised National List of Areas of the European Ecological Network Natura 2000, a small part of MOREA project passes near or within the area of the Natura 2000 Network «Artemisio and Lyrkio Mountains» (GR2510004), which has been designated as a Special Protection Area (SPA). However, the largest part of the motorway that passes through the SPA, concerns the Artemisio tunnel, with a total length of 1,400 meters in each direction of traffic, where traffic is conducted underground, through a pair of one-way traffic tunnels.

A Special Ecological Assessment (SEA) 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 SEA (2016) where the impact of the Project on the conservation objectives of the SPA GR2510004 was assessed, there are no significant impacts on the characterization and demarcation species of the area, on the other protected species of Annex I of Directive 2009/147/EC or on their habitats. Taking into account the location of the project, the size and the topography/morphology of the area, the potential impacts are either of low probability or of negligible intensity. Based on the conclusion of the SEA, the operation of the Concession Project does not substantially affect the structure and functions of the area, as it does not affect the integrity and conservation objectives of the SPA GR2510004 or the coherence of the Natura 2000 Network as a whole.

Apart from the SPA GR2510004, the Concession Project is located outside the boundaries of areas of the national system of protected areas. However, in the neighboring area, as well as in the wider area of the motorway transit zone, sensitive environmental elements are identified, mainly concerning areas of organized construction and riparian zones of rivers.

For each case and depending on the subject, the environmental requirements are complied with and the appropriate measures are taken during the Operation and Maintenance of the Concession Project, such as traffic noise meas-

urements, monitoring of ecological parameters, monitoring of air pollution, etc.

The Department of Environment in collaboration with the competent Departments of the Operation and Maintenance Directorate of MOREA monitors and records anything that may be related to the presence of any protected wildlife species within the boundaries of the Concession Project.

The relevant locations (technical/culverts) of possible wildlife passage are checked, macroscopic control of possible nests is carried out, with emphasis on sensitive areas and the environmental parameters are monitored within the project boundaries.

During the operation of the project to date, no incidents involving protected species have been recorded. The underground passage of the motorway through the Artemisio Tunnel (a pair of one-way traffic tunnels) in the SPA GR2510004 contributes to this, as in this way the natural relief of the area is not disturbed and the free communication of the fauna and, by extension, its protected species is not hindered.

With regard to the flora within the boundaries of the project, its care and the maintenance of the plantings is a constant concern of MOREA. The existing flora along the highway compensates for and improves the green balance, while at the same time the selected species are in harmony with the endemic ones without hindering their spread or acting competitively.

At MOREA motorway project, maintenance, planting and irrigation works were carried out on the central islet of the motorway, 200 km long and on the supports and branches of the 770 km long interchanges of the motorway.

At Attiki Odos project, green management is carried out with a view to harmonizing the motorway with the

wider environment. In 2023, 800,000 trees and shrubs and 78,000 square meters of lawn were maintained. For the proper development of the above plants, 20,600 kg of inorganic fertilizers were used, as well as extremely small quantities for the size of the pesticide project, since biological control (cutting and burning) is the first choice. Also, from the pruning and cutting products of plant material, a total of 7,800 m3 of branch cutting products were produced using pruning shredders (special machinery for this purpose), which were then used as an organic fertilizer for soil cover, as well as for the production of compost.

Regarding the protection of the local fauna, a special fence has been installed so that wild or stray animals do not enter the highway, while provision has been made to prevent passing birds from colliding with the glass sound curtains, by placing special markings, based on international standards. ATTIKIKI ODOS and ATTIKES DIADROMES collaborate with the «ANIMA» association for the care of wild animals and birds that happen to enter the highway, as well as with various companies for the care of stray animals.



## ENVIRONMENT

The projects of the Environment segment aim to protect and conserve biodiversity and habitats through compliance with the environmental licensing of the projects and the requirements set by the competent authorities for the protection of biodiversity and habitats. In particular, it refers to the restoration projects of landfills, HELECTOR contributes to their reintegration into the environment and the preservation of biodiversity. One of the stages of operation of a landfill is its restoration, when it has now reached the point of saturation in terms of waste volume. In the restoration of the area after saturation, it is planned to be remodeled with planting forestry species, adjusted to the natural and ecological conditions of the area.



# 03 Society

136

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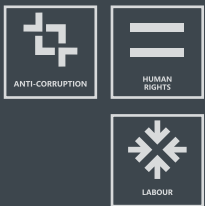
## Social Responsibility

- 168 Contribution to the Creation of Sustainable Cities & Communities
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### Alignment with the Sustainable Development Goals



### Alignment with the Principles of the United Nations Global Compact







## MAIN ACHIEVEMENTS



Design and implementation of the educational action plan on Sustainable Development topics



Signing of the Diversity Charter for Greek Businesses



Permanent and long-term collaboration with Organizations to support Society



Whole Living

New identity for the corporate social responsibility program titled "Whole Living"



Participation in the in-house seminar "ISO 30415 DIVERSITY & INCLUSION" aimed at independent and external validation of the organizational approaches implemented by the Group to integrate Diversity and Inclusion into the workplace

## 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

49% & 57%

in ELLAKTOR S.A. in REDS  
the percentage of female employees

95% & 83%

employees from the local community  
managers

87% 33%

increase in volunteer hours compared to 2022  
increase in the average training hours per employee compared to 2022

€933 thousand

total expenditures on actions to promote the Health and Safety of the Group's employees in 2023

















# 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

To achieve the strategic objectives set for employee development and to prevent incidents while fostering a Health & Safety culture aimed at achieving zero accidents, the Group has designed the following action plan in this direction:

Design and implementation of a holistic improvement program for the well-being of the Group's employees	
Diversity, Equity & Inclusion Policy	
Program for the enhanced inclusion of vulnerable groups through recruitment	
Design and implementation of Human Rights due diligence	
Monitoring and evaluation of indicators (KPIs) to track wage disparities	
Evaluation of employee remuneration based on relevant studies to ensure adequate wages for living wage	
Women's Empowerment Program	
Leadership training program for managers	
Implementation of the "360 Feedback" evaluation	
Expansion of the certification of Health & Safety Management Systems according to the ISO 45001:2015 standard to 100% of the Group's projects	
100% internal Health & Safety audits across the Group's projects	
Health & Safety audits of critical business partners	

 In progress     Completed

## HUMAN RESOURCES

For ELLAKTOR Group, human resources constitute its most significant competitive advantage. The Group invests in the well-being of its people and the creation of a positive work environment, establishing the appropriate structures and conditions to promote education, development, and recognition, offering equal opportunities and supporting diversity. In 2023, the Group employed 2,260 individuals, comprising highly skilled scientific professionals, as well as experienced technical personnel. The Group's objective is to continuously improve the management of its human resources, following the best international practices and applying management and monitoring systems per Company and per Division. At the same time, it revised and further developed its existing procedures, within the framework of the approved Human Resources Policy, in line with the provisions of Law 4706/2020, placing emphasis on transparency, equal opportunities and the more efficient operation of the Group. The [Human Resources Policy](#) is communicated to the Group's employees in all countries of operation and in a language that is easily understood.

## EMPLOYMENT

As of the end of 2023 (31.12.2023) the Group's employed personnel numbered 2,260 employees. Of these, 98% of the employees were on full-time contracts and 96% were employed under indefinite-term contracts. Notably, the majority of employees (76%) worked in the field (projects / activities), while 24% were based in the Group's offices.

The company's policy is primarily to employ staff under permanent contracts. However, temporary employees are hired periodically to address urgent needs related to project implementation.

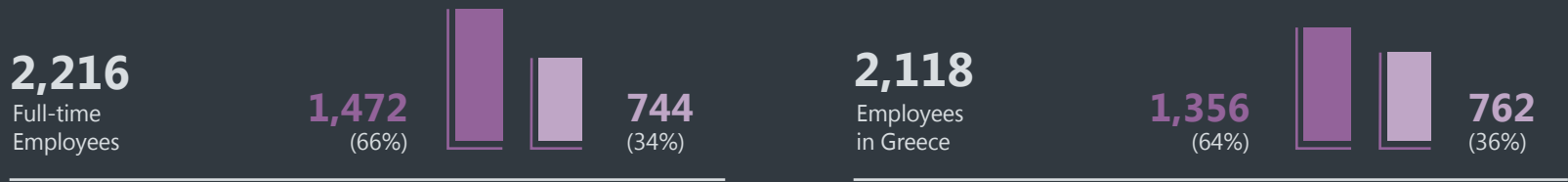
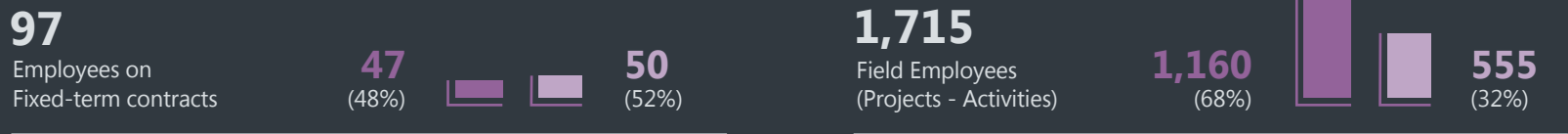
As of the end of 2023 (31.12.2023), 31 workers were employed through subcontractors in the Group's activities.

It is worth noting that the Group's companies prioritize hiring personnel from the local communities in the broader region where a project operates. Indicatively, 95% of the Group's employees and 83% of its managers come from local communities.

<sup>1</sup>The data refers to the continuing operations of ELLAKTOR Group companies. It includes 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



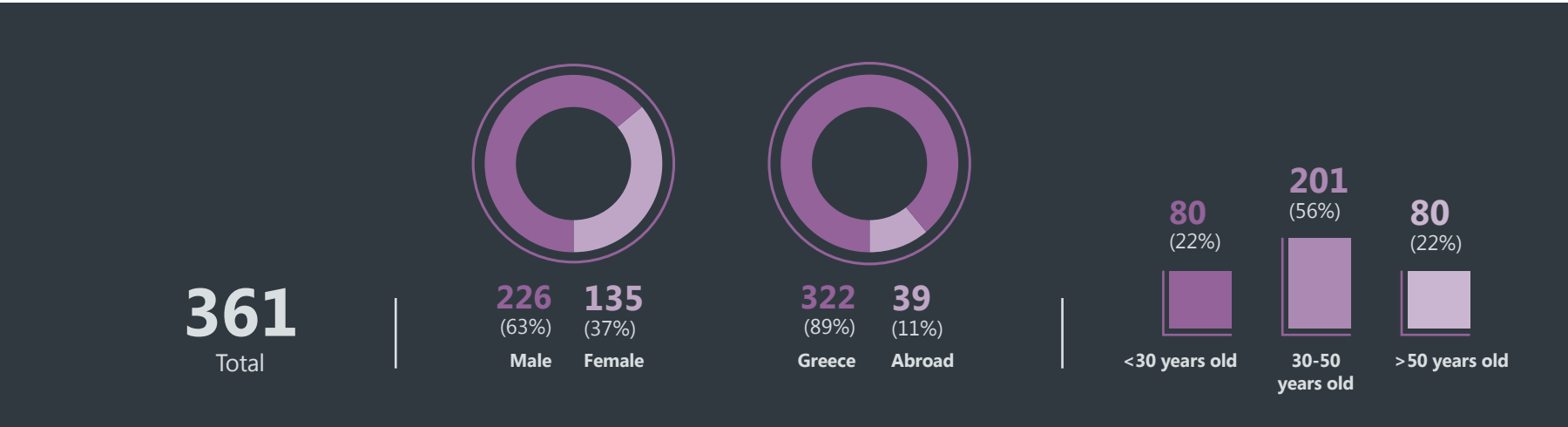
Employees per Age Group



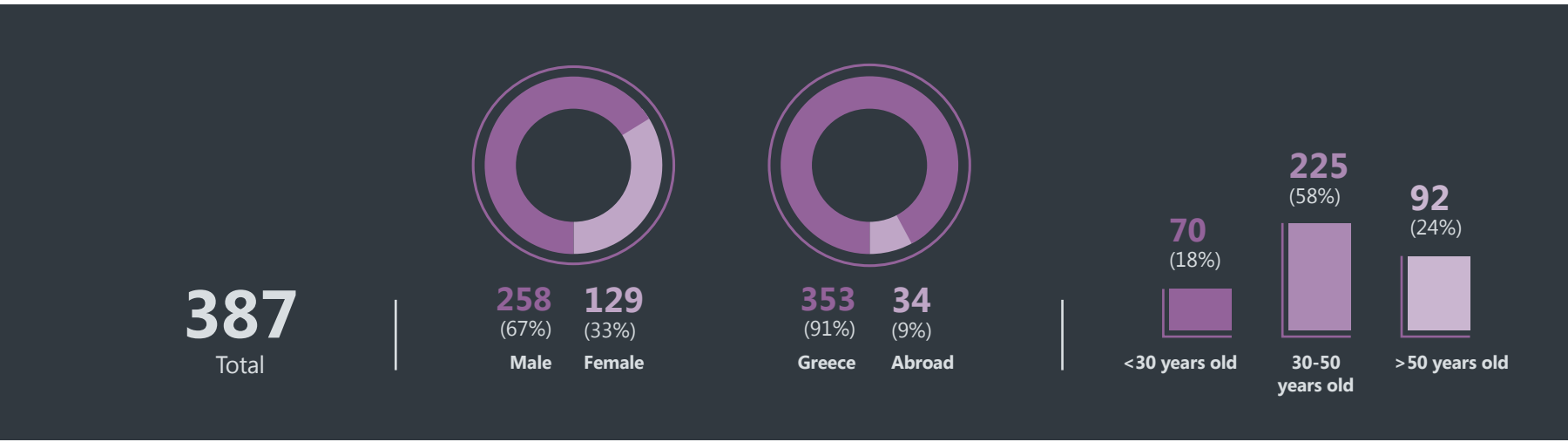
	Total	<30 years old	30-50 years old	>50 years old
Full-time – Indefinite Term	2,122	108 (5%)	1.281 (60%)	733 (35%)
Part-time - Indefinite Term	41	3 (7%)	25 (61%)	13 (32%)
Full-time - Fixed-Term	94	26 (28%)	54 (57%)	14 (15%)
Part-time - Fixed-Term	3	0 (0%)	3 (100%)	0 (0%)
Employees in Greece	2,118	115 (6%)	1.295 (61%)	708 (33%)
Employees abroad	142	22 (15%)	68 (48%)	52 (37%)



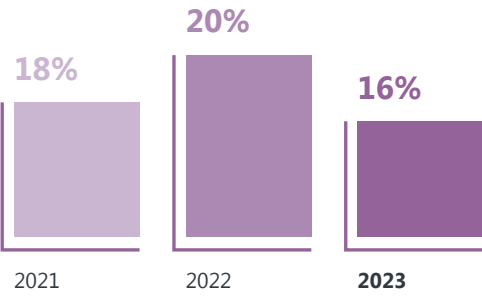
Employee New Hires



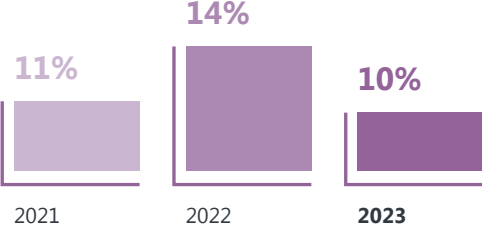
Employee Turnover



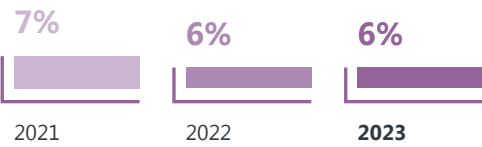
Employee turnover rate



Voluntary turnover rate



Involuntary turnover rate



*Note:* Turnover rates have been calculated using the number of employees who left the organization and the average number of employees for the year. The KPIs for the years 2021 and 2022 have been recalculated and include the continuing operations of 2023.



Compared to 2022, the percentage of female employees at ELLAKTOR S.A. remained at the same level (49%), while at the company REDS, the corresponding percentage increased to 57%, marking a 33% growth. Regarding employee recruitment by age group, it is noteworthy that in 2023, the percentage of hires for employees over the age of 50 increased to 22%, compared to 9% in 2022. Lastly, there was a significant decrease in the employee turnover rate, which dropped to 16%, as opposed to 20% in 2022.

## 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.

ELLAKTOR Group recognizes the existence of risks stemming from the lack of equal advancement opportunities and the absence of attractive remuneration and benefits, which may lead to the loss of experienced and skilled employees or a decline in the performance of its workforce.

The Group's objective is to mitigate the aforementioned risks through policies and procedures aimed at retaining and attracting new employees and executives. This is achieved through performance evaluations and the implementation of a unified remuneration and benefits system. This system ensures lawful compensation and strives to maintain competitiveness in the labor market of each country where the Group operates, often offering remuneration and benefits beyond those mandated by law.

### Employees Performance Evaluation

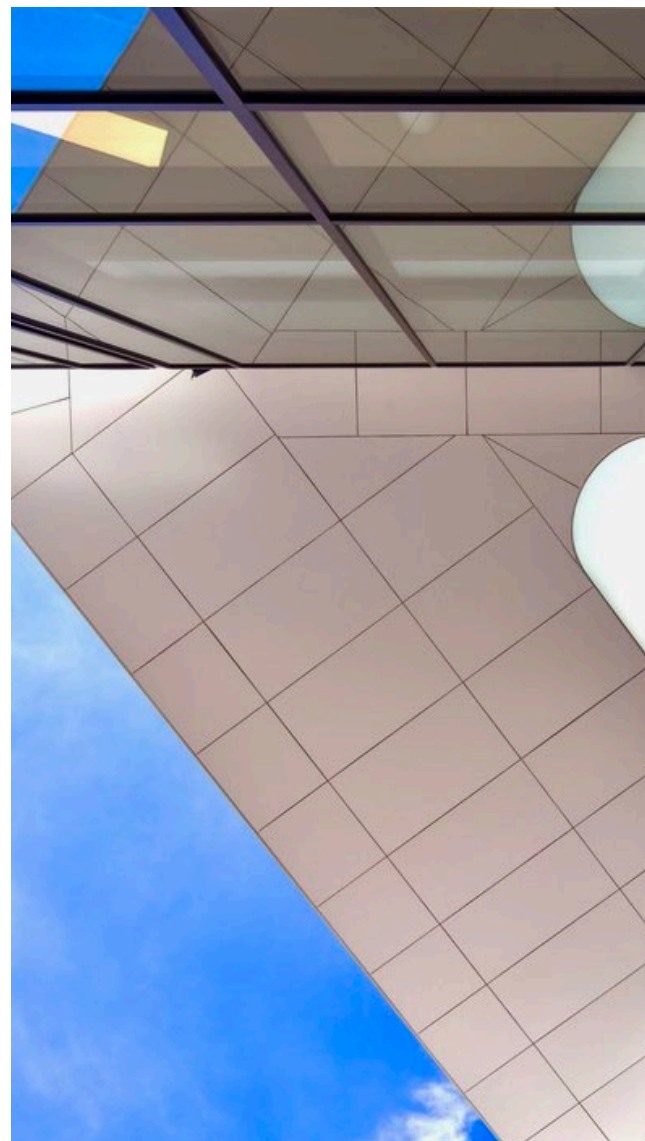
The Group has adopted and implements a Performance Evaluation System tailored to its needs and specificities. This system, which has been designed by the Human Resources Division, concerns the evaluation of specific skills and behaviors that the Group's employees should demonstrate in their daily work. 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 2023, the annual performance evaluation for the current year was conduct-

ed at ATTIKES DIADROMES and MOREAS companies. Specifically, at ATTIKES DIADROMES, 767 employees were evaluated, representing 94% of the total workforce (97% of men and 92% of women). Similarly, at MOREAS, 99% of the employees were evaluated (99% of both men and women). The employees selected for the evaluation were those who had been with the company for at least one year.



### 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, regardless of race, gender, color, nationality or ethnic origin, class, religion, age, disability, marital status, sexual orientation, gender identity, political beliefs, or any other form of 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 2023, the Group reviewed the level of employee remuneration and benefits in order to make them competitive with the market, normalizing any discrepancies.

It is worth mentioning that at ELLAKTOR S.A., all employees are paid above the national minimum wage. The starting salary for male employees is 43% higher than the minimum wage, while for female employees, this percentage stands at 40%.

The needs of each employee's role, in conjunction with the level (Grade) assigned to that role, determine

the benefits provided by the Group.

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

The Group complies with labor legislation and, beyond the legal requirements, voluntarily offers benefits and other facilities to support employees in performing their work. All benefits are defined by specific policies.

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

- Company car, fuel card, transponder (e.g., e-pass), and mobile phone, depending on the role's requirements.
- Monthly daycare allowance for parents of preschool-aged children working in the Group's companies.
- Free transportation via company shuttle bus during arrival and departure hours at the Group's headquarters and certain project sites, to facilitate employee commutes.
- Children of employees of the Group's companies have the opportunity to attend summer camps during the summer period, thereby supporting working parents.

Finally, recognizing the paramount importance of education for the future of young people, ATTIKI ODOS has established an annual scholarship for the children of its employees who excel academically. The «Dimitris Papamichail» Scholarship has been awarded since 2008 to the student who, among the children of employees of the companies involved in the operation of the motorway, achieves the highest entrance score to a Greek university or technical institution (AEI or TEI). Additionally, all other candidates for the scholarship receive a laptop as a gift to support their studies.



## Work-Life Balance and Employee Well-being

ELLAKTOR Group, recognizing the value of investing in employee health and well-being, as well as in fostering a positive work environment and employee engagement, has set as a strategic priority the design of a holistic improvement program, "Living Well." The program includes the implementation of a series of targeted actions aimed at promoting corporate health and wellness.

In this context, a dedicated Working Group has been established to design and implement the program. The group includes representatives from the Human Resources Department, Strategic Development Department, Health & Safety Department, Communication Department, and the ESG Strategy & Sustainable Development Department of the Group. The actions planned and executed aim to enhance employee health and well-being across three key pillars: Physical Well-being, Mental Well-being, and Social Well-being.

Here are some indicative actions already implemented under each pillar:

### PHYSICAL WELL-BEING

- ▶ for the first time in 2023, 100 employees of the ELLAKTOR Group, along with their families, participated in the Greece Race for the Cure 2023 to raise awareness and provide information about breast cancer.
- ▶ measurements were conducted among employees to detect diabetes in recognition of World Diabetes Day
- ▶ employees were informed through specialized health messages on the prevention and fight against breast cancer, in collaboration with the organization Alma Zois
- ▶ employees at the Group's headquarters were informed about the benefits of healthy eating on World Health Day, and healthy snacks were distributed
- ▶ triplex heart screenings were conducted for Group employees as a preventive measure
- ▶ for the first time, a basketball team was formed by Group employees and participated in a corporate league. Additionally, since 2003, the ATTIKES DIADROMES football team has been competing in organized workplace tournaments (11x11), featuring a mix of experienced veterans and new players who have achieved multiple distinctions and won several trophies
- ▶ at ATTIKI ODOS and ATTIKES DIADROMES, 27 employees were sponsored to participate in the 40th Athens Authentic Marathon in November 2023, competing in the 5 km, 10 km, and classic marathon races. Beyond covering participation costs, the companies ensured all participants underwent necessary medical examinations prior to the event, prioritizing their safety



### MENTAL WELL-BEING

- ▶ since 2022, a 24-hour counseling support line has been available at the At-tiki Odos project on a voluntary basis. This service is provided in collaboration with mental health specialists to empower employees and their families



### SOCIAL WELL-BEING

- ▶ volunteer Activities focused on environmental issues, inclusion, and belonging
- ▶ participation of employee-parents in a conference on fostering a healthy relationship between children and screens

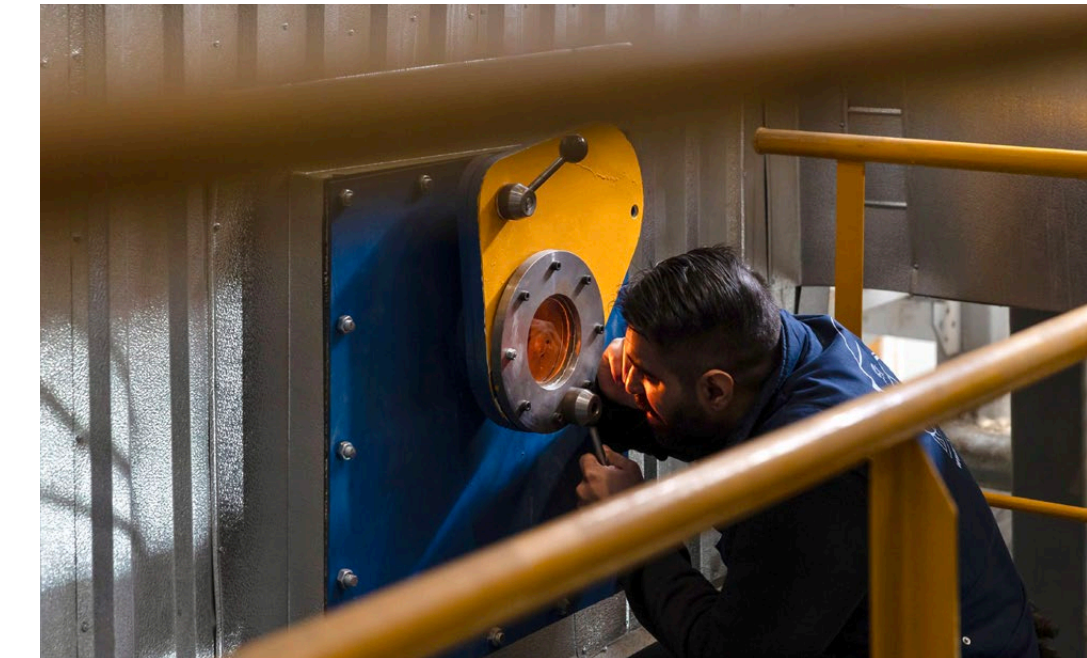


## Employee Selection and Talent Attraction

To staff its positions, the Group follows specific procedures that prioritize filling roles through internal mobility first, before seeking suitable candidates from the external market.

The Group also continues to utilize student employment programs, providing training opportunities for interested participants while simultaneously creating prospects for permanent employment for young scientists.

As part of the current human resource management strategy, emphasis is placed on the development, promotion, and enhancement of employee knowledge. This focus is reflected in the internal mobility statistics within the Group. Specifically, in 2023 54 employees (43 men and 11 women) were transferred to other positions within the same segment and 12 employees (4 men and 8 women) were transferred to positions in a different segment. Additionally, it is noteworthy that out of the 31 employees who were promoted, 52% were women.





## EMPLOYEE TRAINING AND DEVELOPMENT

The training and development of the Group’s employees is one of the pillars for achieving its corporate objectives. For this reason, procedures related to the training and development of human resources have been designed and implemented at the Group level.

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 topics that have been identified by the Group.

Close monitoring of the needs for training, updates, and further development of employee skills, in collaboration with operational units and the Human Resources Division, is critical for the growth of each employee. It ensures their ability to meet their responsibilities effectively and keeps them aligned with industry and market developments. In this context, the Group encourages employees to participate in conferences to stay informed about industry trends. Simultaneously, through the use of the E-learning electronic platform, the Group aims to provide direct access to training and promote high participation rates facilitated by remote learning opportunities.

The Group organizes training programs for its entire workforce, aiming to transfer expertise and improve employee skills. The type of training is selected by the Training and Development Department of the Human Resources Directorate in collaboration with the employees’ managers. The training consists of two distinct plans, one concerns general training and the second is tailored to employees’ roles and career advancement plans, based on the results of their annual evaluations.

In order to ensure the success and usefulness of the training program, the Human Resources Division evaluates the effectiveness of the courses conducted through questionnaires and uses the findings to improve and further develop the program.

Specifically for the Board of Directors (BoD) members, the Human Resources Division designs and proposes an annual Training Program in collaboration

with the Nomination and Remuneration Committee, in accordance with the Group’s Training Policy for BoD members and Managers and undertakes its implementation.

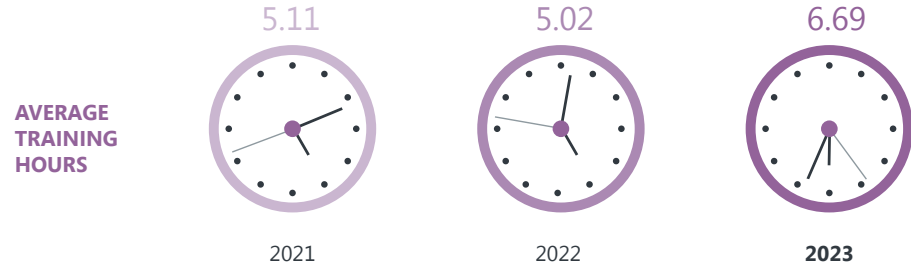
In 2023, a total of 15,128 hours of training were conducted (9,395 for men and 5,733 for women). It is estimated that the average number of training hours per employee reached 6.7 hours (6.3 for men and 7.4 for women), marking a 33% increase compared to 2022, when the average training hours were 5.0 (4.9 for men and 5.2 for women).

The increase in the average training hours per employee compared to 2022 is attributed to the enhancement of training programs, achieved through both the expansion of topics and the increase in available courses and training programs organized. For female employees, the average training hours increased by 43% compared to 2022, while for male employees, the increase was 29%.

Of the training hours conducted in 2023, 19% were directed at employees in managerial positions, while 81% were aimed at employees in non-managerial positions.

In 2023, the employees of ELLAKTOR S.A. participated in a wide range of training activities aimed at further developing their knowledge and skills. At ELLAKTOR S.A., the average training hours per employee amounted to 17.8 hours. More specifically, the average training hours per employee were 8 hours for male and 28.2 hours for female employees.

The total expenses for employee training conducted during the year are estimated at €144,877.



*The KPIs for the years 2021 and 2022 have been recalculated to include the continuing operations of 2023.*

### Training on ESG & Sustainable Development Topics

In 2023, the ESG Strategy & Sustainable Development Division, with the support of the Human Resources Division, developed a two-year plan of training activities aimed at further informing and sensitizing employees on Sustainable Development issues. The program launched in May 2023 with the training of the Group’s Department Heads, in collaboration with a specialized partner, focusing on a comprehensive coverage of Sustainable Development topics and ESG criteria. The objective of this initiative is to further integrate these topics into the Group’s philosophy and operations, ensuring a deeper understanding and alignment with sustainability and ESG principles.

Additionally, at the beginning of 2024, as part of the new Corporate Social Responsibility program «Whole Living,» the launch of the «SDGs Coffee Breaks» program took place. This initiative aims to inform and raise employee awareness about the 17 United Nations Sustainable Development Goals (SDGs), in collaboration with the non-profit organization Wise Greece.

On the occasion of International and World Days, the ESG Strategy & Sustainable Development Division sends Sustainability Messages to all employees to further inform and raise awareness on sustainability topics.



Trainings per topic

	NUMBER OF EMPLOYEES		HOURS 2023	PERCENTAGE	TRAINING SUBJECT
	79		516	3.4%	Leadership/Management
	59		725	4.8%	Information Technology (IT)/ Digital Skills
	23		283	1.9%	Compliance
	1,263		5,517	36.5%	Health & Safety
	1		16	3.4%	Quality
	1,026		3,617	23.9%	Environment & Energy
	152		1,430	9.4%	Operational / Technical topics
	10		80	0.5%	Diversity, Equity & Inclusion
	202		2,944	19.5%	Other topics*
	2,815	15,128 Total	*Other topics include areas such as Sustainable Development, Risk Management, Corporate Governance, and more.		

ELLAKTOR S.A.:  
Training for the Board  
of Directors, Committee  
Members & C-level  
Executives on ESG &  
Sustainable Development  
Topics

In 2023, ELLAKTOR S.A. conducted, for the first time, 184 hours of training for members of the Board of Directors, its Committees, and senior executives on ESG and Sustainable Development topics. The aim of these training programs is to expand opportunities for the Group to contribute more significantly to both the natural and social environment, while also enhancing the understanding of the Board's role in guiding the Group's response to climate change and the Sustainable Development agenda.

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 of 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 Labour 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.

Additionally, the Group is committed to adhering to the International Convention on the Elimination of All Forms of Discrimination Against Women, the Convention on the Rights of the Child, the United Nations Declaration on the Rights of Indigenous Peoples, and the Convention on the Rights of Persons with Disabilities.

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 an international level the adoption of 10 globally accepted principles in the areas of human rights, labour conditions, environment and anti-corruption on an international level, is committed to upholding these principles in its business activities, as well as in its collaborations with stakeholders. The Group also strives to protect and enhance diversity with the goal of maintaining an inclusive work environment.

ELLAKTOR Group, taking into account the nature of its activities and its value chain, has identified the most salient issues related to human rights, as these may pose the most serious negative impact, both on its own operations and on its business partnerships and stakeholders.

Salient issues related to human rights	Stakeholders who may be affected	Actions to Address the Impacts
Health, Safety & Well-being	<ul style="list-style-type: none"><li>Employees of the Group</li><li>Suppliers and Other Business Partners</li><li>Local Communities</li></ul>	<a href="#">Health and Safety at work</a> <a href="#">Work-Life Balance and Employee Well-being</a> <a href="#">Social Responsibility</a>
Discrimination (Gender, Nationality, Sexual Orientation, Disability, Age, etc.)	<ul style="list-style-type: none"><li>Employees of the Group</li><li>Suppliers and Other Business Partners</li><li>Local Communities</li></ul>	<a href="#">Employment</a> <a href="#">Diversity, Equity &amp; Inclusion</a> <a href="#">Safeguarding Human Rights</a> <a href="#">Regulatory Compliance</a>
Harassment and bullying	<ul style="list-style-type: none"><li>Employees of the Group</li><li>Suppliers and Other Business Partners</li></ul>	<a href="#">Diversity, Equity &amp; Inclusion</a> <a href="#">Safeguarding Human Rights</a> <a href="#">Regulatory Compliance</a>
Remmuneration	<ul style="list-style-type: none"><li>Employees of the Group</li><li>Suppliers and Other Business Partners</li></ul>	<a href="#">Employment</a> <a href="#">Safeguarding Human Rights</a> <a href="#">Diversity, Equity &amp; Inclusion</a> <a href="#">Regulatory Compliance</a>
Working Hours	<ul style="list-style-type: none"><li>Employees of the Group</li><li>Suppliers and Other Business Partners</li></ul>	<a href="#">Safeguarding Human Rights</a> <a href="#">Employment</a> <a href="#">Regulatory Compliance</a>
Human Rights Affected by Climate Change	<ul style="list-style-type: none"><li>Employees of the Group</li><li>Suppliers and Other Business Partners</li><li>Local Communities and Broader Society</li></ul>	<a href="#">Safeguarding Human Rights</a> <a href="#">Social Responsibility</a> <a href="#">Adaptation to Climate Change</a>

The above-mentioned issues are those recognized by the ELLAKTOR Group as the most salient regarding human rights. However, this does not imply that the Group does not recognize and manage other related matters.

The Group has adopted a [Policy against Harassment and Violence at Work](#), which is another practical commitment to zero tolerance for any form of violence or harassment in the workplace. The goal of the policy is to create and establish a work environment that respects, promotes, and ensures human dignity and the right of every individual to a workplace free from all forms of violence and harassment. An e-learning course has been created on the Group’s platform regarding the Policy against Harassment and Violence at Work, through which employees are trained on the concepts of violence and harassment, as well as the reporting and complaint mechanisms. Among the employees who have completed the course, 39% are Managerial Executives, who, through the training, learn how to effectively handle any incidents of bullying or harassment.

At the same time, both the Group and the employees are protected by the terms and provisions of the Code of Ethics, which they sign upon hiring, as well as business partners through the contracts they enter into.

The Group offers compensation in full compliance with all applicable laws and industry standards, regardless of race, gender, color, nationality, or ethnic origin, class, religion, age, disability, marital status, sexual orientation, gender identity, or political and cultural beliefs. Additionally, it adheres to labor legislation regarding working hours, work schedules, and the payment of statutory bonuses/allowances. It is worth noting that 88% of employees are covered by the National Collective Labor Agreements in force in each





country of operation, and that all Group employees are at least 18 years old.

The Group is committed, through its [Human Rights Policy](#), to uphold the right to associate and engage in collective bargaining, to ensure that employees participating in labor unions are not subjected to any form of bullying or harassment, and to foster a constructive dialogue with the legally elected employee representatives based on mutual respect and good faith.

Regarding family protection leave, the Group fully complies with the regulations set out by the applicable labor legislation, which includes, among other things, the ability for parents to request flexible work arrangements for caregiving purposes (such as teleworking, flexible working hours, or part-time employment) and additional days of leave due to serious illnesses of children, for undergoing assisted reproductive methods, and for prenatal examinations.

In 2023, 47 employees (19 men, 28 women) at ELLAKTOR Group were entitled to maternity/paternity leave, and all of them took it as required. Of those expected to return from parental leave, 97% returned to work as scheduled. The percentage of employees who returned from parental leave and remained with the Group 12 months after their return was 82%, while those who did not remain with the Group left voluntarily (contract expiration or resignation).

As a result of the above procedures, during 2023 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

Ensuring equal opportunities, as one of the Group's core values, is placed at the center of its corporate culture, reflecting the belief that a sustainable world can only be achieved if the right conditions are created to encourage and appreciate diversity, promote dignity, and foster inclusion, both in the workplace and in the broader society. At ELLAKTOR Group, creating a work environment that defends and promotes diversity, equality, and inclusion allows the company to effectively respond to challenges, enhance engagement, creativity, and innovation, with the aim of achieving economic prosperity and growth.

In order to achieve the above, the Group has established a [Diversity, Equity and Inclusion Policy](#), which outlines the core principles related to diversity, equity and inclusion, and describes the relevant regulatory documents and the Group's commitments to developing and shaping a diverse, fair, and inclusive work environment. The monitoring of the policy's adherence, as well as the related indicators established at the Group level, is carried out by the Group's Sustainable Development Committee. Initiatives that promote respect and equal opportunities are encouraged to ensure a fair and inclusive work environment. Additionally, to reinforce the corporate culture on these topics, a comprehensive training program was designed by the ESG Strategy & Sustainable Development Division, in collaboration with the Human Resources Division and the Corporate Communications Division, for both senior management and team leaders, as well as for all employees on Diversity, Equity and Inclusion topics. This program was approved by the relevant Committee.

The program began in March 2023, with eleven executives from the Development Strategy, Communications, Human Resources, and ESG Strategy & Sustainable Development Divisions attending the in-house seminar "ISO 30415 DIVERSITY & INCLUSION." The goal of this seminar was to achieve independent and external validation of the organizational approaches implemented within the Group for integrating Diversity and Inclusion into the workplace environment.

The intention of the ELLAKTOR Group is to promote the values of Diversity, Equality, and Inclusion, and to strengthen its corporate principles, policies, and codes in this direction, such as the Code of Ethics, the Code of Conduct for Business Partners, the Human Rights Policy, and the Human Resources Policy. Additionally, the Group aims to extend these principles across its entire value chain through the Code of Conduct for Business Partners, which serves as the foundation for collaboration with business partners. More information regarding the policies and codes applicable at the Group level is available on the [Group's website](#).

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

By accepting the terms outlined in the Charter, ELLAKTOR Group reinforces its commitment to practices that ensure respect for and acceptance of diversity within its workforce, without discrimination. In this way, the Group contributes to securing a fair work environment with equal opportunities for all.

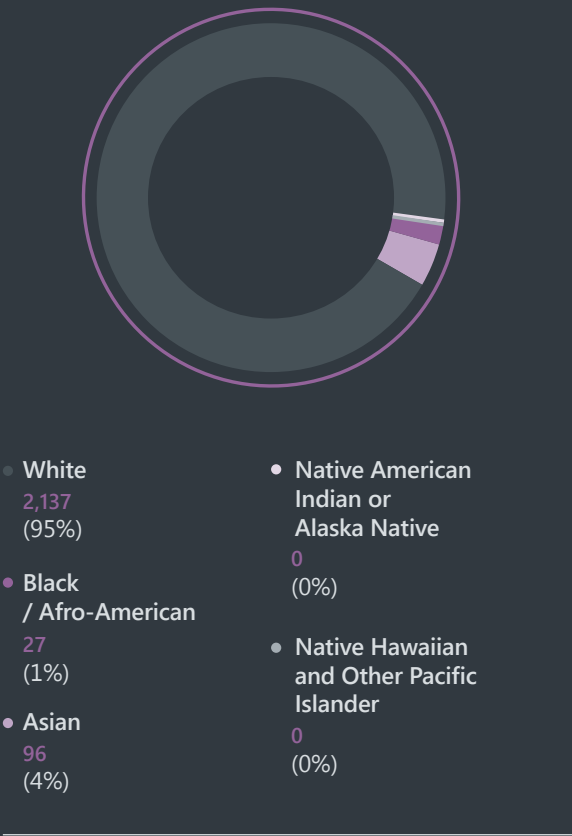
ELLAKTOR Group has also signed the Women’s Empowerment Principles (WEPs), created by the United Nations, UN Women, and the UN Global Compact, to promote gender equality and women’s empowerment globally in the workplace, marketplace, and society. In ELLAKTOR Group, gender equality is an inalienable fundamental right, and signing the Women’s Empowerment Principles reaffirms its commitment to a workplace free from inequalities and exclusion. Through training programs conducted by UN Women and the UN Global Compact, ELLAKTOR Group executives participate and stay informed about developments in the field of gender equality in the workplace.

Additionally, ELLAKTOR Group participated for the first time in the Bloomberg Gender Equality Index (GEI) assessment for 2023, achieving a score higher than the inclusion threshold. This success was the result of a series of actions and initiatives implemented over the past two years and serves as a true recognition of the Group’s commitment to the principles and dynamic promotion of diversity, equity, and inclusion.

Finally, in 2024, as part of the approved program to strengthen the corporate culture on Diversity, Equality & Inclusion, training on Unconscious Bias was conducted for the Group’s executives. The goal of this training was to help participants understand unconscious biases, identify them, and reduce their impact both in the workplace and in personal life.

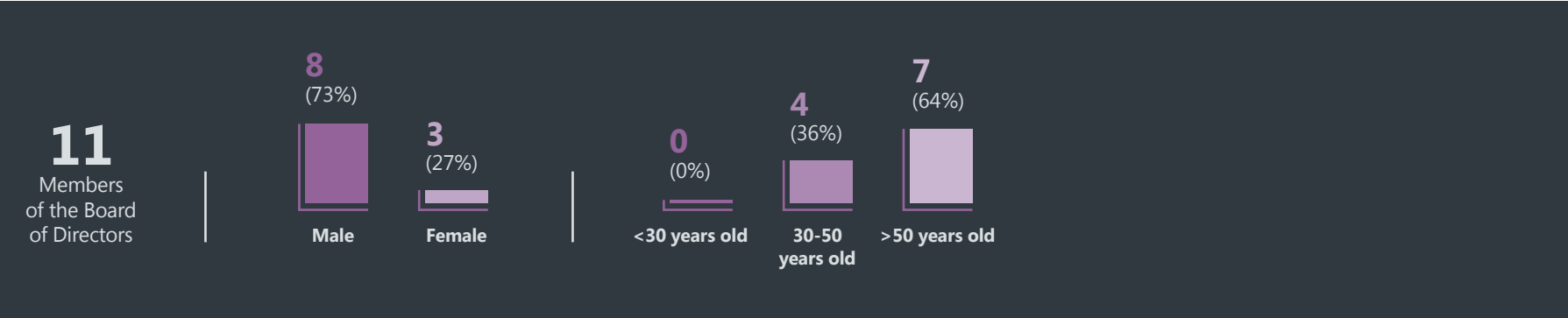


Race Chart

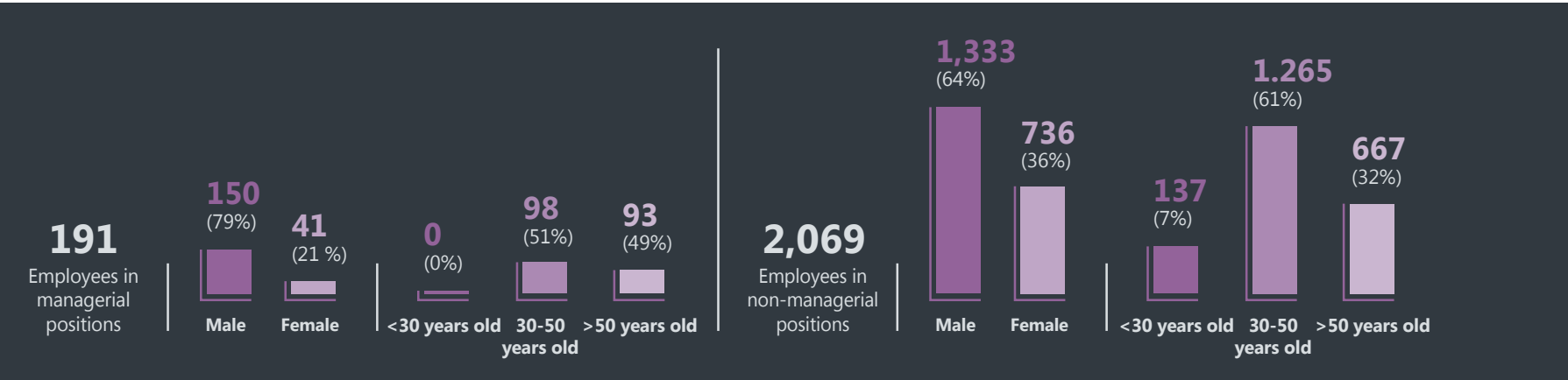


It is noted that in 2023, no incidents of discrimination were recorded or reported to the Human Resources Division or the Compliance Division of the Group.

Diversity in Governance Bodies  
(Board of Directors 11.01.2024)



Diversity in Employees



It is worth noting that at the senior management positions (C-level) of the Group, the percentage of women is 57%. In 2023, at ELLAKTOR S.A., the ratio of the base salary of female employees to male employees was 0.93, while the ratio for employees in managerial positions was 0.98, and for employees in non-managerial positions, it was 1.07.

In 2023, 3 people with disabilities (0.13%) were employed at the Group, while 9% of the Group’s employees have a nationality different from the country in which they are employed.



## HEALTH AND SAFETY AT WORK

### Health & Safety Policy at work

The care for the Health & Safety of all employees within the Group is a core part of its broader business policy and philosophy, as one of the most important factors in ensuring its developmental course.

In this context, and based on the broader philosophy of the Group, the Management, through the new [Health & Safety Policy](#), is committed to complying with the applicable national and European legislation, as well as all other requirements. It is also dedicated to providing the best possible Health & Safety conditions in the workplace, continuously maintaining and improving the Health & Safety Management System to eliminate risks and reduce hazards related to 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 on 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 (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 pre-qualification 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.

### 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 2023, 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. 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.

In the Group's companies, employees are given the opportunity to participate in Health & Safety committees. The role of these committees focuses, among other things, on identifying risks and submitting proposals to the relevant authorities for minimizing them, collaborating with and supporting the employer to ensure a safe environment, and participating in training and actions related to health and safety issues. For example, at HELECTOR S.A., there is an employee committee at the company's headquarters, as well as at the OSNABRUCK MBT project, where the employee participation rate in the committee covers 75% of the project.

## 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 as-

essment 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). The Group has the Talk2ELLAKTOR reporting mechanism, which is available on the internal network (intranet) to facilitate employees in reporting, among other things, any health and safety risks they may identify in the workplace, either anonymously or with their name. For more information about the reporting process, report management, and the protection of both the reporter and the reported, you can refer to the [Whistleblowing Policy](#).

## 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. More particularly, 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.

## 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 2023 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 continued its significant collaboration with the Hellenic Institute of Health and Safety (ELINYAE), with the aim of raising employee awareness on topics such as communication, empathy, and strengthening relationships, as well as promoting a culture of Health & Safety.
- Issuance of Monthly and Ad-hoc Health & Safety Flashes for projects/facilities, with different topics each time, depending on the emerging needs, aimed at training, informing, and raising aware-

ness among all employees. Specifically, in 2023, the Group's Health & Safety Division issued and communicated 12 Health & Safety Flashes.

- 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 2023, 1,077 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 2023, 432 MHSRs were created and forwarded to the Group's Health & Safety Division.
- Creation of Health & Safety e-courses on the HR e-learning platform on issues of «Health and Safety Guidelines for the Group's Projects/ Facilities /Construction Sites».
- 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. The monthly meetings are held at least once a month.
- Review of the Written Occupational Risk Assessment of projects and Emergency Response Plan, due to ongoing developments.



On the occasion of World Health & Safety Day 2023, which is celebrated annually on April 28th, the Group carried out a series of actions aimed at raising awareness among employees on these important issues. Specifically, the Group’s Health & Safety Division and Managers visited a large number of projects and held consultations involving employees of both the Group and its subcontractors. Information sessions were also conducted for the employees of MOREAS S.A. by the Health & Safety Manager. Additionally, on World Health & Safety Day at Work, the Group distributed keychains shaped like reflective safety vests to all employees, symbolically promoting the use of Personal Protective Equipment (PPE).

Recognizing the importance of emergency response preparedness, the Group’s subsidiary HELECTOR acquired 6 additional defibrillators to provide First Aid at its operating plants. Additionally, training on the use of defibrillators, as well as hands-on practice in Cardiopulmonary Resuscitation (CPR), was conducted at the Headquarters of ELLAKTOR Group, with the participation of 100 employees from all the Group’s companies. Furthermore, First Aid training sessions were held for 7 employee teams at the Headquarters of ELLAKTOR Group.

In June 2023, a Full Employee Evacuation Drill was conducted at the Headquarters of ELLAKTOR Group, simulating a Fire Emergency scenario, with the participation of fire department officers. Preparedness drills are essential for assessing response times and procedures during an emergency, and their regular repetition is critical for continuously improving Health & Safety procedures. This fire safety drill was considered successful, both in terms of employee readiness and response to the functionality and effectiveness of systems and structures, the immediacy of the Emergency Response Team, and for the improvement actions that were identified and set for immediate implementation. At the same time, a Full Evacuation Drill was also conducted at the Alimos Marina facilities, involving all employees. This drill applied a fire scenario and focused on immediate response actions taken by the marina’s fire safety/emergency team.

A key role in developing a unified Health & Safety culture is played by the Group’s Occupational Health Clinic, which has carried out activities in conjunc-



tion with global health awareness days, such as World No Tobacco Day, World Blood Donor Day, and other health-related observances. These initiatives include providing information to employees, distributing educational materials, sending Health & Safety messages, and maintaining direct communication with employees. Additionally, practical scenarios have been implemented to address Health and Safety incidents, ensuring that employees are well-prepared for emergencies.

On the occasion of World Blood Donor Day, the Group’s Health & Safety Division informed all employees with a Health message about the importance of blood donation and the critical need for blood donors. Additionally, the Group’s Occupational Health Clinic, in collaboration with the Blood Donation Center of the «ELPIS» Hospital, organized three Blood Donation Days in 2023 at the Group’s Headquarters.

In October 2023, the Group’s Headquarters acquired two Life Vac devices for choking emergencies, available for use by all employees at the headquarters. Following the procurement of these devices, a training session was conducted on their proper use, in collaboration with the Group’s Occupational Health Clinic and the Company’s Health Visitor. All employees participated in the training, which was divided into three groups for better assimilation. Additionally, in October 2023, which is dedicated to Breast Cancer Awareness, a Health message was shared with employees, along with a lecture by the organization «Alma Zois», focusing on breast cancer prevention and awareness.

On World Diabetes Day in November 2023, following the Health flash on Diabetes, the Occupational Health Clinic conducted an awareness session for employees,

as well as blood glucose tests to check for diabetes for any employee who wished to participate. As a result of the tests, a number of employees identified abnormal readings and proceeded to undergo further blood tests for confirmation.

In December 2023, on World AIDS Day, employees were informed through a Health & Safety flash highlighting actions to prevent the transmission of the HIV virus, as well as measures to protect against its spread.

It is estimated that in 2023, the total expenses for health and safety initiatives (e.g., for health and safety equipment, personal protective equipment, measurements/inspections, actions taken, etc.) for the Group’s employees amounted to €933,052.



**€933,052**

he total expenses for health and safety initiatives for the Group’s employee



## 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 2023, a total of 30 Health & Safety audits were conducted across 26 of the Group's projects. The audits carried out across all the Group's companies met the requirements of the Health & Safety Management System, covering 68% of the Group's active projects. This confirmed the commitment to continuous internal monitoring and compliance with applicable legislation and the Group's internal procedures for Health & Safety. Additionally, 46 external audits were carried out on the Group's projects in 2023 by the relevant authorities and certification bodies.



# 30

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 & Safety 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 2023, by activating the new tool for recording unsafe actions and conditions to prevent incidents and accidents, 35 unsafe actions and 9 near-miss incidents were recorded for immediate correction, resulting in a Near Miss Frequency Rate (NMFR) of 0.65.





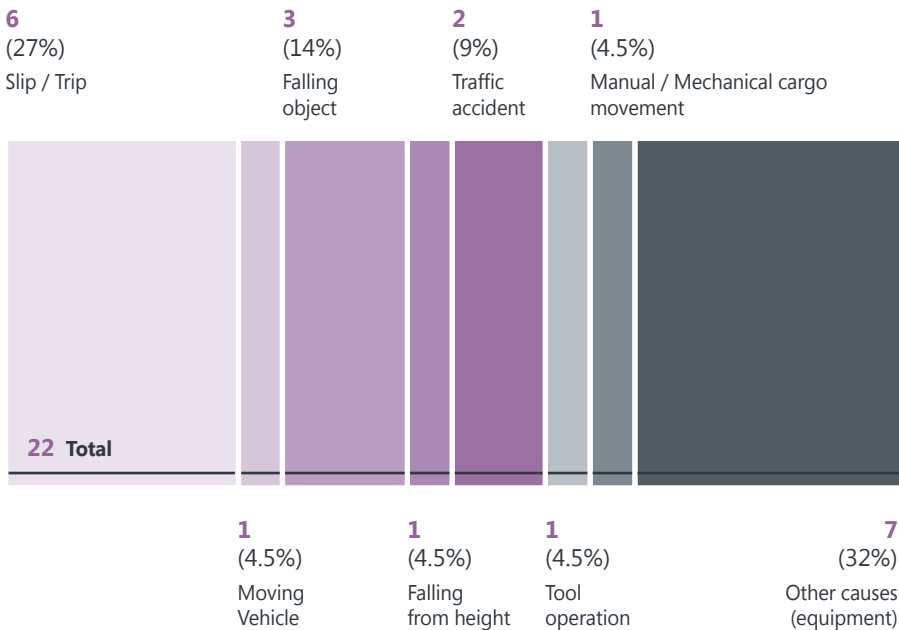
### Health and Safety Performance Indicators

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

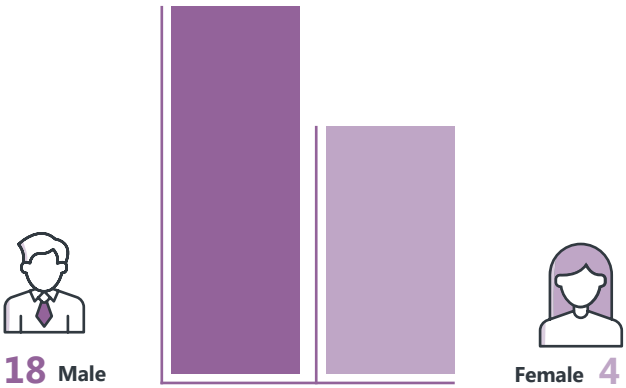
In 2023, at ELLAKTOR Group companies 22 employee accidents were recorded (excluding pathological, fatal, road accidents to/from work and zero days of absence from work) of which 21 were minor. The lost days recorded due to the 22 accidents were 475\*. Of the 22 accidents, 2 involved road accidents during work hours. In addition to the 22 accidents, 1 accident with zero days of absence was recorded, as well as 2 road accidents while commuting to/from work.

*\*Accidents that resulted in lost workdays continuing into 2024 have also been taken into account.*

#### Causes / Nature of Group Employees' Accidents



#### Group employees' injuries



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

Regarding subcontractors' injuries, in 2023, 3 accidents were recorded (excluding pathological, fatal, accidents with zero days of absence from work, and road accidents while commuting to/from work).

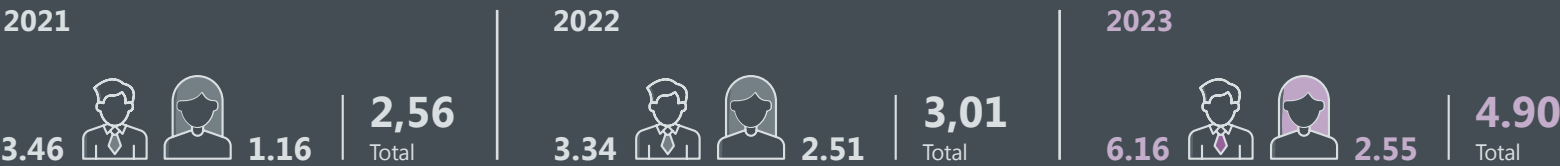
All accidents of the Group and its subcontractors are managed with the same procedure and methodology as defined by the Health & Safety Management System. All accidents, depending on their severity and magnitude, follow a sequence of actions in relation to their corresponding severity.

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 2023 no occupational diseases and no deaths due to occupational diseases were recorded.

### Health and Safety Performance Indicators for Group Employees

#### Accidents - Incidents Frequency rate



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



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



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*

*The KPIs for the years 2021 & 2022 have been recalculated and include the continuing operations of 2023.*



### Training on Health and Safety Issues

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. In 2023, 1,263 employees of the Group participated in training programs covering topics including, among others, introductory Health & Safety training and the 15 Inviolable Health & Safety Rules, fire safety and fire protection, hazardous substances, electrical hazards, heat stress, hot works, safe driving, working at heights, reporting unsafe actions and conditions, first aid, safe use of work machinery, use of personal protective equipment (PPE), mental health, and bullying, among others.

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 the 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.

Among others, the following training programs were implemented in 2023:

- Fire Safety Drill to the Emergency Team of the ELLAKTOR Group

Headquarters by PYROGNOSI Institute (Hellenic Fire-Fighting Institute), lasting 8 hours, in order to ensure continuous training and preparedness in case of emergency. All employees participated in the drill in collaboration with the members of the Group’s Emergency Response Team at the headquarters. A full evacuation of the Group’s headquarters was conducted following a fire scenario. The Emergency Response Team and employees responded promptly. The drill was successfully completed within the time limits specified by the Fire Service and the requirements of current legislation.

- First Aid, Fire Safety, and Fire Protection training sessions were also conducted for employees at the Alimos Marina project, while Fire Safety and Fire Protection training was provided to employees of HELEKTOR’s subsidiary companies in the area of the OEDA Fyli.
- As part of the program for conducting preventive drills to address accident and disaster incidents, as mandated by the «Xenokratis» plan and the requirements of Greek legislation regarding the minimum safety requirements for tunnels of the trans-European road network (P.D. 230/2007), the company Moreas S.A., in collaboration with the Civil Protection Directorate of the Region of Peloponnese, organized a full-scale preparedness exercise in a tunnel of the Corinth-Tripoli-Kalamata motorway and the Lefktro-Sparta branch.
- Training seminars on «Stress and Anxiety Management and Relief» were conducted by HELLAS EAP, as well as on the use of a defibrillator by the medical team of ATTIKES DIADROMES S.A. Em-

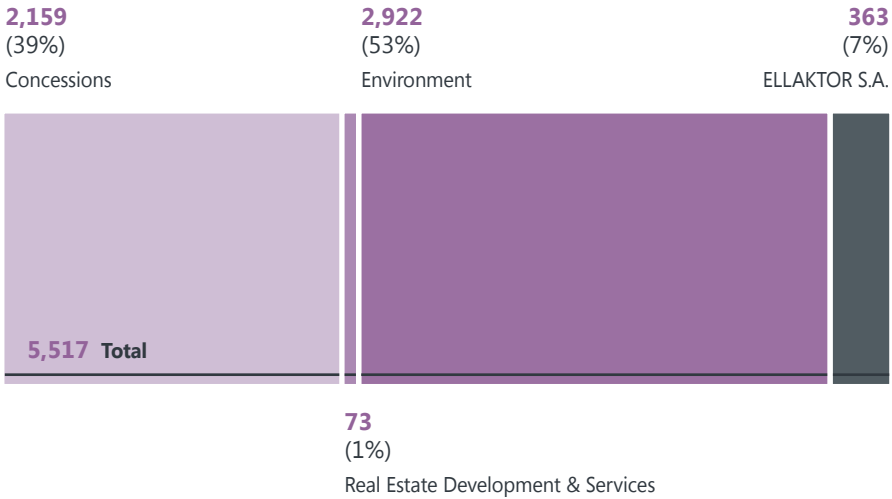


ployees from ATTIKES DIADROMES S.A. and ATTIKI ODOS S.A. participated in the seminars, which included both theoretical and practical training.

- Training seminars on «Fire Safety and Fire Protection of Industrial Facilities» were conducted from May to July 2023 by the PYROGNOSI Institute. Employees from the companies HELEKTOR S.A. (OEDA West Attica), ASA S.A., EPALTHEA S.A., and the PRASINO EMA Joint Venture participated. The seminars included both theoretical and practical training, with a total of 59 participants.

Finally, in the context of systematizing the recording of the training courses attended by the subcontractors’ employees, relevant certificates are issued when the respective training courses are completed. According to the available data, in 2023, employees of the Group’s subcontractors attended approximately 286 hours of training on Health and Safety issues at work.

#### Health & Safety training hours



In 2023, there was a 19% increase in training hours on Health & Safety topics, attributed to the addition of new courses and diversified content, including Health & Safety topics relevant to office employees.



# Social Responsibility

The core objective and strategic priority of ELLAKTOR Group is to operate responsibly within the society in which it conducts its business. The Group contributes to social prosperity through its business activities and social initiatives, responding consistently, responsibly, and transparently to the needs and expectations of local and broader communities. At the same time, it operates with environmental responsibility, delivering high-quality infrastructure, energy, and environmental projects, aiming to improve people’s quality of life and promote sustainability.

Action Plan

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

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	●
Quality audits were conducted on 100% of the projects.	🌀
Increase in training for quality engineers	🌀

🌀

In progress

●

Completed

## CONTRIBUTION TO THE CREATION OF SUSTAINABLE CITIES AND COMMUNITIES

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 Group’s activities are carried out safely through systematic adherence to relevant requirements, which are outlined in the respective contracts as well as national and international control standards. Effective management of these requirements is achieved through the establishment of appropriate control procedures, their integration into Quality Management Systems in accordance with the ISO 9001:2015 standard, and the allocation of suitable resources (personnel, equipment, materials, external partners, etc.) for their effective implementation. In this way, it is ensured that:

- 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 De-

partment at regular intervals to confirm that the relevant requirements are being met.

It is worth noting that at HELECTOR, 100% of surveyed customers reported being satisfied in a customer satisfaction survey conducted in 2023. Additionally, at the companies ATTIKES DIADROMES and MOREAS, 116 customer complaints were recorded, all of which were resolved 100%.



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.



#### ENVIRONMENT SEGMENT

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 preserving 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.

HELECTOR was awarded the Energy Globe National Award Greece 2023 by the Austrian Embassy for the Biogas Energy Utilization Unit at the Mavrorachi Landfill. The Mavrorachi Biogas Energy Utilization Unit is a project of strategic importance for the energy and environmental improvement of regional landfills. The Mavrorachi Station, unique both in its technical design and operation, produces renewable electricity while simultaneously preventing the release of greenhouse gases. This, along with the energy utilization of the produced biogas and the improvement of air quality, played a decisive role in the unit receiving this award.



#### 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 iconic, high-quality projects and is progressing with investments in new developments, such as the development, operation, and management of the Alimos Marina, Cambas Park, one of the largest investment projects in Attica with a budget of €200 million, and the Gournes Heraklion Crete development project, which includes the construction of a luxury hotel, residential units, and a shopping center. This project will become a distinct tourist, commercial, and entertainment destination in the wider Eastern Mediterranean region. The purpose of these projects is to improve the quality of life for people and local communities, while prioritizing the protection and enhancement of 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 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.

#### 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.



#### CONCESSIONS SEGMENT

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 2023, 130 24-h measurements were made with mobile noise measurement units. Based on these measurements, no additional noise barriers were required. Throughout the 23 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 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 2023, 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 2023, no exceedances of the established noise limits have been recorded.



#### ENVIRONMENT SEGMENT

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.

## 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.

In the Real Estate Development & Management segment's projects, the Group proceeds with the design and implementation of projects following consultation with the local community, taking into account its needs and expectations.

Aiming to enhance interaction with its stakeholders, the ELLAKTOR Group has created new direct communication channels with its stakeholders through its website.

In 2023, the ELLAKTOR Group carried out its first two open initiatives with the local community, where over 1,800 people were informed and raised awareness on Sustainable Development topics.

More specifically, to mark the celebration of World Biodiversity Day on May 22 and World Bee Day on May 20, ELLAKTOR Group, in collaboration with the Smart Park Commercial Center, organized a unique initiative focusing on the protection of bees and their contribution to humanity and biodiversity conservation. The event raised awareness among employees, their families, and the local community.

Additionally, on the occasion of United Nations Day, ELLAKTOR Group, in collaboration with Smart Park, organized a series of interactive educational activities for children titled "Let's Keep Our Planet Blue". The event

featured the official ambassadors of the United Nations Sustainable Development Goals, The Smurfs. Through fun activities, children participated in gardening workshops, played recycling games to learn the correct separation of recyclable materials, and engaged in various educational memory and visualization games focused on forms of green energy and the Sustainable Development Goals.





## CORPORATE SOCIAL RESPONSIBILITY INITIATIVES

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

Since 2022, the Group has implemented a Donations and Sponsorships Policy, aimed at defining the fundamental principles governing the Group's donations and sponsorships, the necessary characteristics of the sponsored initiatives and organizations, as well as the procedures to be followed during the evaluation and implementation of donations and sponsorships. According to this Policy, monetary donations or in-kind donations to political parties, political coalitions, or politicians are not permitted.

The Donations and Sponsorships Committee of the Group was established to ensure the Group's commitment to always stand by society, listen to its needs and expectations, and respond with sensitivity, professionalism, dignity, and respect. The Committee aims to build trust relationships and support the local communities in which the Group operates. Among its responsibilities are the approval, monitoring, and implementation of the Group's Donations and Sponsorships Strategy and the Annual Donations and Sponsorships Plan. In 2023, the Committee held 12 meetings.



€848,149

The contribution of the ELLAKTOR Group to society through donations and sponsorships in 2023.

## *“Whole Living» is the new identity of the Corporate Social Responsibility Program of ELLAKTOR Group*

Corporate Social Responsibility initiatives, as an expression of support for society and environmental protection, have the primary purpose of providing substantial assistance to those in need, improving the daily lives of people, contributing to environmental and social initiatives, and safeguarding the future of the planet.

However, they must not consist of isolated acts of contribution but should be cultivated with consistency and continuity, highlighting the value of systematic, collective effort and the power of collaboration for a better life and a sustainable future.

The expression of social responsibility extends beyond actions. It involves shaping and establishing a culture of voluntary contribution and collective effort, the continuous pursuit of mental and physical well-being, harmonious coexistence without discrimination, the personal and professional growth of all individuals, fostering innovation and promoting a modern way of life, and systematic care for the environment. In this way, we can envision a sustainable world for ourselves and future generations.

In this context, the ELLAKTOR Group launched the new identity of its Corporate Social Responsibility program, titled “Whole Living”, in September 2023.

In this context, the ELLAKTOR Group launched the new identity of its Corporate Social Responsibility program, titled “Whole Living”, in September 2023.



The new identity, “Whole Living,” embodies all the above values through 4 key action pillars, which are outlined below:



Living Green

We aim to protect our planet and address the climate crisis to ensure sustainability for future generations through the implementation of “**Living Green**” actions



Living Smart

We promote a modern way of life through the use of innovation and technology via “**Living Smart**” actions.



Living Well

We encourage good physical and mental health, aiming to improve our well-being through “**Living Well**” actions.



Living Together

We ensure a “life without discrimination” by promoting equal opportunities, access, inclusion, and acceptance, as well as personal and professional development, collective actions supporting vulnerable groups, and more, through “**Living Together**” actions.

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 2023, are indicated below.



### Gold Sponsor of the Hellenic Swimming Federation

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 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 600 Hope Boxes, equivalent to 3 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 600 Hope Boxes traveled to the Ano Liosia Social Grocery and the Kalamata Social Grocery. The beneficiaries of this initiative by the Group amounted to 1,116 families per month.

### Contribution to the creation of quality public healthcare services

In early 2024, the ELLAKTOR Group donated a state-of-the-art digital color ultrasound machine to meet the educational, research, and operational needs of the 3rd Pediatric Clinic of the National and Kapodistrian University of Athens.

### 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, founded in 2018 following the devastating wildfires in the Marathon region, which resulted in significant losses of property, natural resources, and human lives. As an official partner of the United Nations in the "Restoration Decade 2021-2030" campaign and under the auspices of the Region of Attica, We4All has planted thousands of trees in Greece and abroad in collaboration with companies and organizations.

In 2023, the Group decided to continue this highly successful partnership and upgraded its role to the EARTH PROTECTOR level, which corresponds to the planting of up to 5,000 trees.

Regarding environmental education programs, the Group conducted environmental training in schools within the areas where it operates through the "GREEN FUTURE" program. Specifically, in November and December 2023, five interactive seminars were held for students to inform and educate them on key environmental issues and best practices, emphasizing volunteerism and its importance.

It is important to note that the program also included the "GREEN HOPE" initiative, which focuses on the inclusion and integration of vulnerable social groups, as one of the five training sessions took place at a Special School. The total number of participants exceeded 200 students and teachers.

Additionally, as part of this collaboration, the Group donated 500 new fruit-bearing saplings to fire-affected areas. More specifically 80 fruit-bearing trees were provided to Lake Evia, 260 olive trees to Skepasti, Northern Evia, 100 olive trees to Gytheio in Eastern Mani, and 60 fruit-bearing trees to Kalyvia, Attica. All the trees in Northern Evia and Eastern Mani were planted on the fields of affected farmers who saw their properties destroyed in the 2021 wildfires, while the trees in Kalyvia, Attica were planted on land belonging to an organization that was completely destroyed by the 2023 wildfires. This land aims to offer experiential engagement of children and young people with nature. On October 17, 2023, a hybrid seminar was held at the Group's facilities to educate and raise awareness among employees on critical environmental issues, such as climate change, the consequences of fast fashion, and food waste. The seminar was attended by 228 employees and aimed to help them understand both the risks humanity faces from human activities and the importance of small daily changes in habits. By making even minimal adjustments, individuals can contribute to significant collective improvements for a sustainable future.

### Fire Prevention

ELLAKTOR Group responded promptly to a request from the Forest Service of Lake Evia for the donation of equipment that will assist in both fire suppression and the protection of the remaining forest and the regenerating forest following the devastating 2021 wildfire in Northern Evia.



### CONCESSIONS SEGMENT

Over the years, "ATTIKI ODOS S.A." and "ATTIKES DIADROMES S.A." have chosen to address the next generation of drivers and have successfully conveyed the message of road safety to more than 190,000 children and teenagers.

In 2023, with the support of the companies, six educational programs on road safety and traffic education continued to be implemented, designed with the assistance of specialized professionals. It is worth noting that among the approximately 400 schools that embraced Attiki Odos' educational initiatives this year, there were 12 Special Schools.

More specifically:

- ▶ 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 is the progression of an interactive live seminar. It 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, and in the most remote islands and villages. In 2023, more than 3,700 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 2023, the Children's Museum of Athens welcomed the public in specific time zones, with 6,752 children and 6,293 adult visitors.

- ▶ Additionally, since November 2023, at the Attiki Odos exhibit in the Athens Children's Museum, photographs taken by the children of employees from ATTIKI ODOS S.A. and ATTIKES DIADROMES S.A. who participated in the volunteer initiative "Holidays and Road Safety" have been on display. Families visiting the museum have the opportunity to explore this mini photography exhibition and draw their own conclusions by observing images captured on Greek roads during the children's summer holidays. As part of the initiative, an electronic draw was held among all participants, with five lucky winners receiving an action camera.
- ▶ The Digital Activity Folder for Traffic Education was designed recently, 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 2023, the Digital Portfolio was sent electronically to 333 teachers from 229 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 2023, with the total impact of the show over the years amounting to approximately 64,500 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 2023, which was actually the year the action was launched, more than 5,000 children from 29 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 2023, this experiential traffic education program was implemented in 116 kindergartens and primary schools and about 6,250 children participated in it. In total, over the years, more than 86,000 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:

- ▶ 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, 39 riders/responders of the organization participated in a specialized theoretical and practical training program.

- ▶ An awareness advertising campaign was conducted through banners on news websites to further promote and highlight the educational programs and the broader initiatives of Attiki Odos aimed at fostering a road safety culture.

ATTIKI ODOS S.A. and ATTIKES DIADROMES S.A. stand by local communities, focusing on supporting organizations operating in areas affected by the motorway. Among other initiatives, they support NGOs and other entities that deliver significant social contributions. In response to the devastating floods in Thessaly caused by the “Daniel” storm in September 2023, the companies supported the Hellenic Red Cross by providing essential supplies (500 blankets to the Palamas Municipality in Karditsa, nearly 23 tons of powdered lime, and 9,000 liters of water).

Additionally, the companies supported, among others the “DIAZOMA” Association, 11 primary and secondary schools, the “DYNAMAI” Center for speech, writing, and communication rehabilitation, the Blood Donation Department of the General Hospital of Athens “Elpis,” the SOS Children’s Villages Greece, the Kyrillos Hill Improvement Association, the “Galilea” Palliative Care Unit, and the Athens Alzheimer’s Association.

At the same time, as part of their initiatives to promote road safety among students, the two companies distributed over 500 pieces of support equipment and auxiliary materials (including reflective vests and triangular reflective backpacks). For the needs of a safe driving school, they provided 20 raised transverse road strips (“speed bumps”), and 1,500 informational brochures for motorcyclists. Additionally, they responded to requests from organizations by temporarily providing a total of 830 traffic cones for 4 sports events.

In 2023, MOREAS continued to provide financial support to the “DIAZOMA” Association and the implementation of the 28th International Kalamata Dance Festival. Additionally, MOREAS was a supporter of the 1st Robotics & Intelligent Systems Festival, organized by the Municipality of Kalamata, demonstrating in practice that the Group’s companies stand by the New

Generation and actively support initiatives aimed at promoting innovation and digital transformation.

Furthermore, MOREAS supported the organization of the International Spartathlon Ultramarathon and the «Ancient Messene Open» International Wheelchair Tennis Tournament. Additionally, it contributed to the initiatives of municipalities neighboring the motorway.



## ENVIRONMENT SEGMENT

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.

As part of raising societal awareness, HELECTOR sponsored the “Water Innovation and Circularity Conference (WICC)”, organized by NEVIS S.A. at the Department of Water Resources and Environmental Engineering of the National Technical University of Athens (NTUA), as well as the “10th International Conference of Sustainable Solid Waste Management”, hosted by the School of Chemical Engineering of NTUA in Chania.

Additionally, HELECTOR made a donation to the UN-HCR (United Nations High Commissioner for Refugees) to provide humanitarian aid to those affected by the earthquakes in Turkey and Syria

Additionally, HELECTOR provided a bus to the Association of Parents, Guardians, and Friends of People with

Disabilities of Central Macedonia for the association’s camping and excursion program, thereby facilitating the transportation of children and their families.

## 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 2023, aimed at supporting our fellow citizens in need, and implementing environmental initiatives aimed at mitigating the impacts of climate change. A testament to employee participation in this effort was the 87% increase in volunteer hours compared to 2022, reaching 670 hours in 2023.

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. The Group for 2023 adopted 5 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.

### Volunteer Tree Planting

In November 2023, a volunteer tree-planting event took place with the participation of Group employees, their families, and the Best Buddies NGO, as part of the Green

Hope program, which focuses on the inclusion and integration of vulnerable social groups.

During this initiative, 120 new forest saplings were planted under the guidance of the Parnitha Forest Service. The purpose was to contribute to the forest regeneration of the area and to help stabilize the soil against erosion caused by rainfall, as the region contains a stream. This area had been completely burned during the devastating 2021 wildfires and has been at risk of destruction two more times since then.







Volunteer Cleanup

The ELLAKTOR Group, in collaboration with We4All and the Municipality of Alimos, carried out a beach cleanup near the Alimos Marina. In addition to the Group’s employees and their families, residents of the Municipality and the Humanity NGO also participated. During the activity, over 2,500 liters of waste (mainly microplastics) were collected and removed from the shoreline.

Emergency Response

Responding to the call of the Red Cross regarding the humanitarian crisis caused by the major earthquake in Turkey and Syria, and aiming to support and provide relief to those affected, the ELLAKTOR Group strengthened the initiative to collect and send essential supplies. The items donated by the Group’s employees were packaged and transported to the warehouses of the Hellenic Red Cross with the assistance of volunteer employees. ELLAKTOR Group, in collaboration with Smart Park, once again supported the Hellenic

Red Cross campaign to collect and send essential supplies to flood victims in Thessaly. A total of over 100 boxes of food and water were collected both at the Group’s headquarters and at Smart Park. The collected items were sorted, packaged, and transported to the Hellenic Red Cross warehouses with the help of volunteer employees, to be distributed to those affected by the devastating floods in Thessaly. The Group’s goal through such initiatives is to provide relief to the victims and contribute to improving the difficult conditions of their daily lives.

For the first time in 2023, ELLAKTOR Group participated with 100 employees and their families in the Greece Race for the Cure 2023, aiming to raise awareness and information about breast cancer.

Voluntary Blood Donation

The Group’s employees also actively participate in the voluntary blood donations that are organized. More specifically, the companies ATTIKI ODOS and ATTIKES DIADROMES have been operating a Blood Bank since 2004, to which, if necessary, all employees and their relatives have access. 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.

Finally, the ELLAKTOR Group’s Workplace Clinic, in collaboration with the Blood Donation Center of the «ELPIS» Hospital, organized three Blood Donation Days for 2023 at the Group’s Head Offices with significant response and participation of employees. The aim of these actions is to maintain the Blood Bank in order to cover any blood needs, both for the volunteer blood donor and his family members, as well as for all our fellow human beings in need.

BLOOD DONATION DATA OF GROUP COMPANIES FOR 2023



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

- The result of all these voluntary actions is the strengthening of corporate responsibility and the ethical code of employees by promoting trust, respect, justice and solidarity in the work environment, but also in the wider society. Through the corporate social responsibility policy with the “Whole Living” program, the Group seeks partnerships that will inspire its employees to contribute to volunteer initiatives as well as to the Sustainable Development Goals.
- In more detail, over the last three years (2021-2023), the following were carried out:
- 1,201 hours of volunteering until 2023.
  - Hope Boxes volunteer action in collaboration with Wise Greece: 694 children and 1,156 of our fellow human beings and their families benefited.
  - Make-A-Wish: adoption of 17 wishes with employee participation in the planning.
  - Strengthening the library of the 3rd Primary School of Magoula: 170 students.
  - Through the 55 voluntary blood donations that took place and in which 1,011 volunteer blood donors participated, 1,527 units of blood were collected, while 462 units of blood were made available to relatives and employees of the Group.
  - At the Make-A-Wish Christmas and Easter Bazaars held at the Group’s headquarters, a total of €11,653 was raised.
  - During the volunteer actions to collect and send essential items, over 210 boxes of essential items were collected.



# 04 Governance

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Sustainable  
Development Goals



Alignment with the  
Principles of the  
United Nations Global Compact







MAIN ACHIEVEMENTS



Successful evaluation of the adequacy and effectiveness of the Corporate Governance System



Assessment of business partners' risks using ESG criteria



Third-Party Due Diligence Policy



5 Committees established for the optimal operation of the Group



Certified Business Continuity Management System in compliance with ISO 22301:2019 requirements

MATERIAL ISSUES

Compliance, Integrity, and Business Ethics

Business Continuity and Emergency Preparedness

Enhancing Innovation, Research, and Digital Transformation

Promoting Sustainability in the Supply Chain

OUR PERFORMANCE

0

confirmed cases of corruption, bribery, and conflicts of interest within the ELLAKTOR Group

92%

of procurement by Group companies sourced from local suppliers

€1.6 million

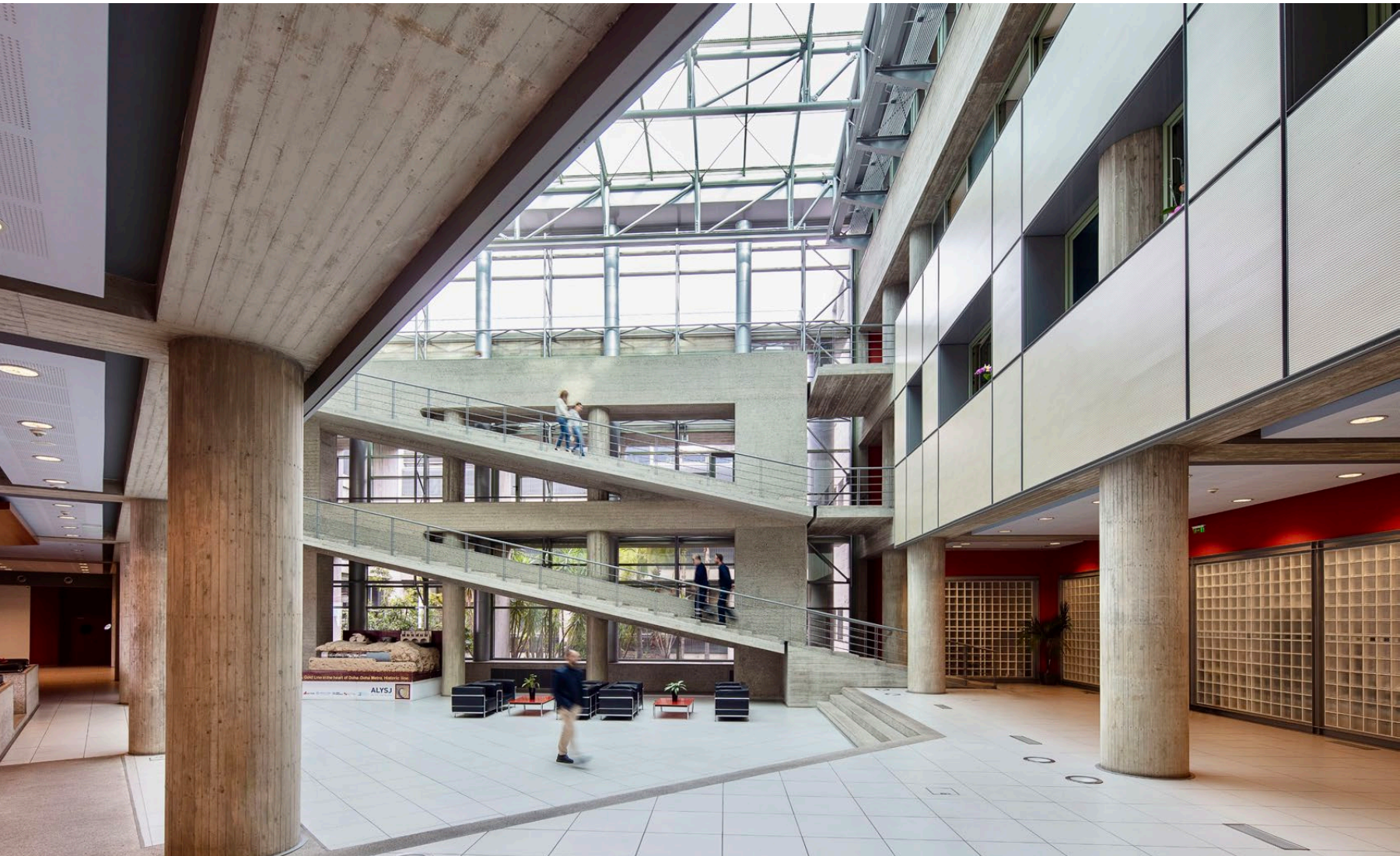
invested in digital transformation

8

research projects





ELLAKTOR Group is committed to operating in a manner consistent with its adopted values, adhering to responsible and ethical practices. To achieve the objectives set in the axes of Integrity, Business Ethics, Innovation, and Digital Transformation, a series of actions has been planned for the coming years, detailed in the respective sections of this chapter.



Action Plan

Evaluate and Score Critical Business Partners based on ESG criteria	
Develop Action Plans to improve ESG performance for critical business partners	
Expand Evaluation and Scoring of business partners using ESG criteria	
Create e-learning Modules on Corruption focusing on bribery, and train employees with access to the platform	
Develop and Implement a Framework for Third-Party Due Diligence on Business Ethics and Integrity	
<b>Term for Integrity in All Contracts with Business Partners</b>	
Provide targeted training for critical business partners of the Group on the Code of Conduct for Business Partners to ensure alignment with ethical practices	
Training of other Business Partners of the Group on the Code of Conduct for Business Partners	
<b>Integration of stricter ESG criteria into the Group's risk register</b>	
Recording, management, and action plan for mitigating identified risks	
<b>Certification and maintenance of the Corporate Governance System according to ISO/IEC 37000:2021 for the company ELLAKTOR</b>	
Certification and maintenance of the Corporate Governance System according to ISO/IEC 37000:2021 for the company ELLAKTOR	
Creation of an e-learning course for employee training on basic digital skills	
<b>Gradual transition of 70% of the Group's systems to a Cloud Server</b>	
<b>Continuous increase in participation in research programs in areas of interest</b>	
Development of partnerships with technology companies, research centers, and educational institutions to enhance innovation	

 In progress       Completed

# Corporate Governance

The constantly evolving environment in which the ELLAKTOR Group operates necessitates the adoption of an effective corporate governance framework that responds to contemporary challenges and adapts to business, economic, and social conditions while identifying risks and opportunities.

The Group’s Management has established a robust and effective Corporate Governance System that facilitates the implementation of its strategy in a way that ensures operational efficiency, protects shareholder interests, and safeguards the legal rights of all stakeholders. Additionally, corporate governance practices are applied to ensure the responsible organization, operation, management, and oversight of the Group.

ELLAKTOR, following an inspection by an independent body, has received the ISO 37000:2021 certification for Governance of Organizations, making it one of the first companies in Greece to obtain this assurance. ISO 37000:2021 serves as the global benchmark for good governance, incorporating all international best practices.

Good governance not only fosters an environment of trust, transparency, and accountability but also aligns an organization’s purpose with societal interests. It helps build strong relationships with stakeholders while effectively managing and maintaining its resources. ELLAKTOR Group’s Management is committed to continuously developing its governance practices and framework to ensure transparency and sound governance at all levels of the Group, supported by the adoption of these standards.

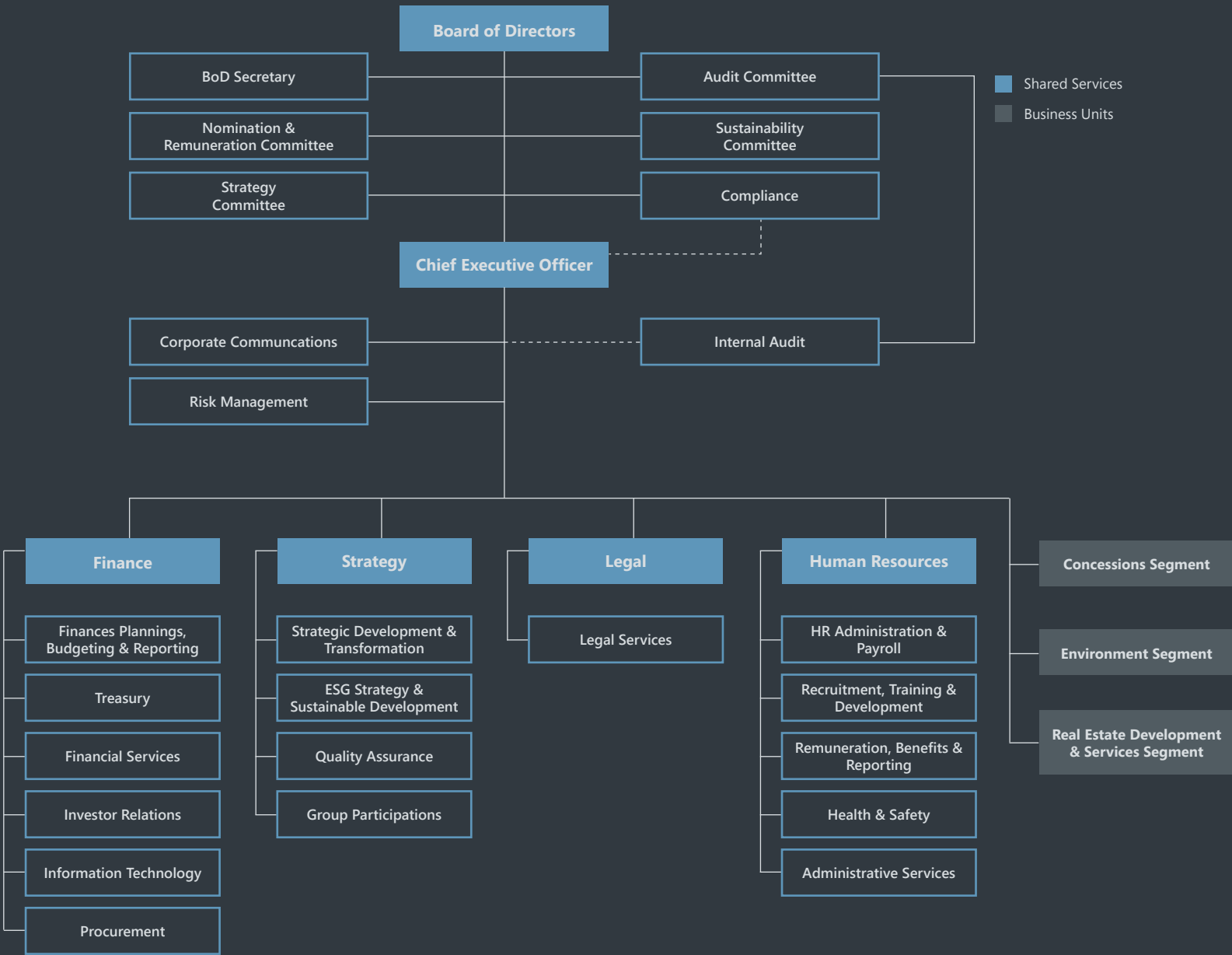
# ORGANIZATIONAL STRUCTURE

The ELLAKTOR Group operates based on a modern and effective model aimed at sustainable and responsible development. It adopts corporate governance practices related to the size, composition, duties, and overall functioning of its Board of Directors and Committees.

Given the nature and purpose of its activities, the complexity of issues, and the large number of subsidiaries and joint ventures in Greece and abroad, the Company’s Board of Directors has established Committees. These Committees, comprising designated members of the Board and senior executives, are tasked with supporting the Management’s work through supervisory, approval, coordination, and advisory roles.

The organizational chart below illustrates the Group’s main organizational structure and primary Committees, as they were at the time of this Report’s publication.

More information about the administrative structure is available on the [Group’s website](#).





CORPORATE GOVERNANCE CODE

ELLAKTOR adheres to the Principles of Corporate Governance as defined by the applicable legislative framework (Law 4706/2020, Law 4449/2017 Article 44, and Law 4548/2018 Articles 152 and 153). For the reporting period, these Principles were incorporated into the Hellenic Corporate Governance Code of the Hellenic Corporate Governance Council (June 2021), to which the Company is subject. This Code, which is based on the Corporate Governance Principles of the Organization for Economic Cooperation and Development (OECD), is published on the Company's official [website](#).

The Corporate Governance Code of ELLAKTOR ensures the continuity and effectiveness of the Group's operations while safeguarding the interests of all stakeholders. It adheres to the principles of transparency, professional ethics, and responsible resource management.

The basic structure of the Corporate Governance Code includes (a) the General Principles, which provide the overarching corporate governance framework and summarize the guiding principles and (b) the Specific Practices, which elaborate on the General Principles and constitute «comply or explain» provisions that serve as the basis for drafting ELLAKTOR's Corporate Governance Statement.

Deviations from the Specific Practices of the Hellenic Corporate Governance Code are detailed in [ELLAKTOR's 2023 Annual Financial Report](#), within the section titled «Corporate Governance Statement.»

It is noted that the Corporate Governance System is monitored and evaluated periodically, at least every three (3) fiscal years, regarding its implementation and effectiveness. This evaluation is conducted by an independent external assessor with certified professional qualifications, in accordance with the approved Corporate Governance System (CGS) Assessment Policy and relevant Procedure. Furthermore, the Corporate Governance System may also be evaluated annually by the audit functions of ELLAKTOR's Internal Control System. In compliance with the applicable legislation, the Company undertook an evaluation of the adequacy and effectiveness of the Corporate Governance System of ELLAKTOR S.A. by independent certi-

fied auditors for the period (17.07.2021 - 31.12.2023), which was completed without any «material» findings.

BOARD OF DIRECTORS & KEY COMMITTEES

The [Board of Directors](#) is the highest governing body of the ELLAKTOR Group. Its members are elected by the General Assembly of Shareholders. The Board is responsible for shaping business strategy, financial management, the legal representation of the Group, the administration, and management of all corporate affairs in accordance with the law and the Articles of Association. It makes decisions on all matters concerning the Group, except those reserved exclusively for the General Assembly of Shareholders. As the highest governing body, it formulates the Company's strategy and supervises and oversees the management of its assets.

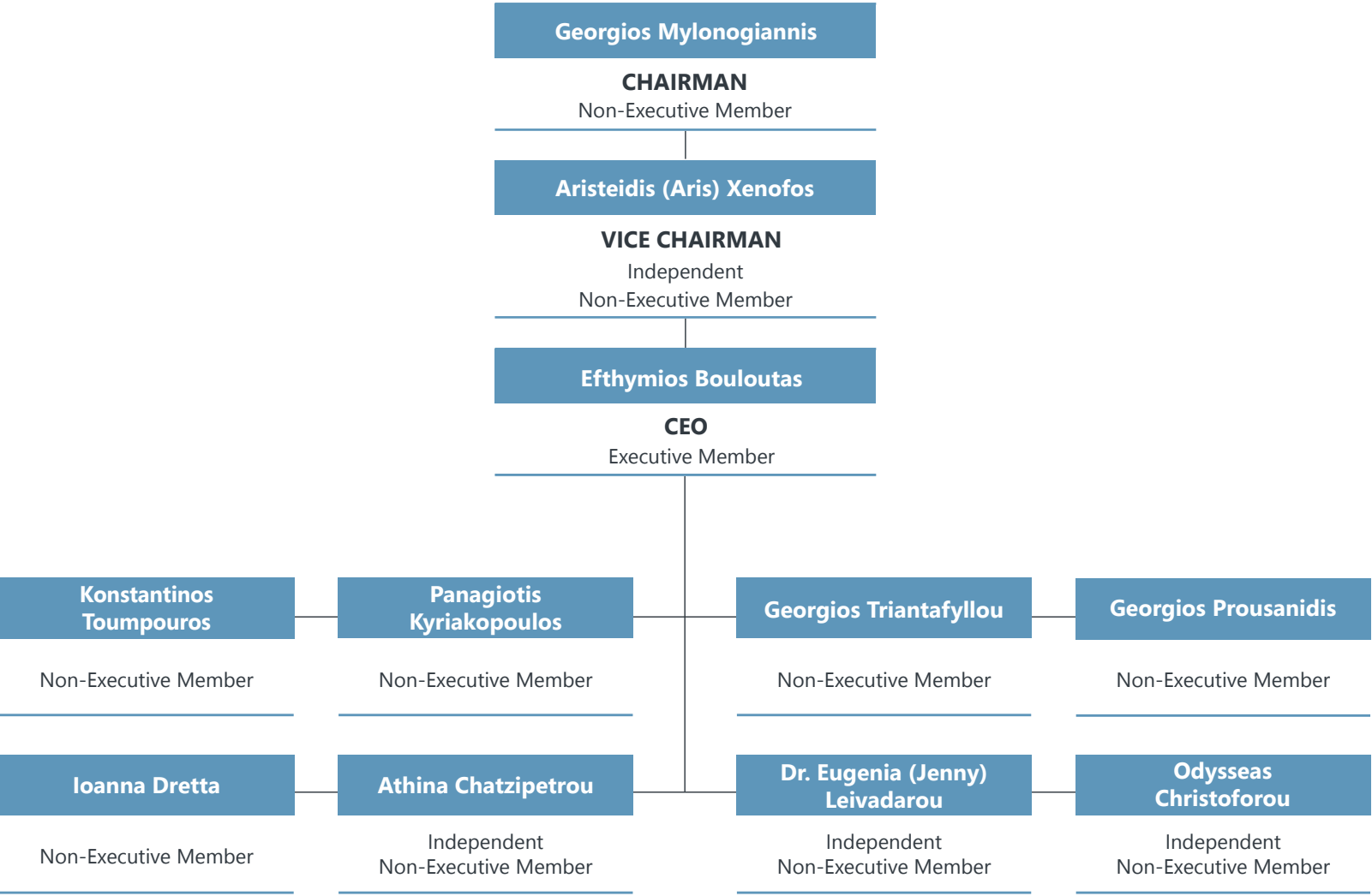
The roles of the Board members are clearly defined and documented in the Company's [Articles of Association](#), the [Corporate Governance Code](#), the [Internal Rules of Operation](#), the [Rules Of Operation Of the Board of Directors](#), and other official documents, all of which are available on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

The term of office for the members is five years, ending on January 27, 2026, commencing from the election date of the initial Board of Directors (January 27, 2021) and concluding with the election of new members by the General Assembly of the year their term ends, with no possibility of extension beyond six years. It is noted that the term of the four additional members of the Board coincides with the term of the other current Board members of the Company.

The Board of Directors, as stipulated in the Articles of

Association, consists of five to eleven members, including executive and non-executive members. As of January 11, 2024, the Board comprised eleven members, of which one was an executive member and ten were non-executive members, including four independent non-executive members as defined by Article 9 of Law 4706/2020, as amended.

The composition of the Company's Board of Directors as of January 11, 2024, is illustrated in the diagram below:



According to the [Sustainability Policy for Members of the Board of Directors](#) of ELLAKTOR S.A., which was approved by the Board of Directors on June 1, 2021, and subsequently ratified by the Annual General Meeting of Shareholders on June 22, 2021, the company adopts and implements a diversity policy in the selection of new Board members. This policy aims to promote an appropriate level of differentiation on the Board and foster a diverse group of members. The objective is to gather a broad range of qualifications and skills to ensure a variety of perspectives and experiences, thereby enhancing plurality and enabling well-informed decision-making.

When selecting members, no exclusions should occur due to discrimination based on gender, race, color, ethnic or social origin, religion or beliefs, property, birth, disability, age, or sexual orientation.

The Nomination and Remuneration Committee assists the Board of Directors, within the scope of its responsibilities, in determining diversity criteria for the selection of Board members.

The Group believes that the diversity it implements, including gender balance, which is not approached based on mandatory quotas but rather on objectivity and without being an end in itself, constitutes a key element for achieving its strategic goals and sustaining its growth. This diversity adds value, enhances the pool of skills, experience, and perspectives available to the Group for its highest positions, and boosts its competitiveness, productivity, and innovation. In a structurally changing environment, it enables the Group to effectively and reliably improve the provision of central services, ensuring its smooth and uninterrupted operation.

It should be noted that the Group complies with the applicable legal framework at all levels regarding the principle of equal treatment. It provides equal opportunities to all employees and candidates and avoids all forms of discrimination.

To reinforce the above, the Group's Policy on Diversity, Equity and Inclusion outlines the fundamental principles concerning diversity, equity, and inclusion. It describes the relevant regulatory documents underpin-

ning the Group's commitments to cultivating and shaping a diverse, equitable, and inclusive working environment.

Furthermore, procedures and structures have been implemented to create a workplace environment where both management and employees are evaluated and judged based on their education, professional background, knowledge of the company's business, leadership skills, experience, efficiency, and creativity.

As a result, the work environment fosters the application of international practices respecting human dignity, free of discrimination and prejudice.

The Board of Directors comprises eleven members of Greek nationality, including eight men and three women. Four members are aged between 30 and 50, while seven members are over 50. Regarding the age of its members, there is significant variation ranging from 41 to 62 years, with an average age of 54.

The standard deviation of the tenure of the Board of Directors' members is 5.99.

Thirty-six percent (36%) of the Board of Directors members were independent, while ninety-one percent (91%) were non-executive. Additionally, twenty-seven percent (27%) of the Board members were women. Furthermore, the roles of Chairman and Chief Executive Officer were not held by the same individual.

Regarding the expertise of the Board members in Sustainable Development matters, it is noteworthy that 8 out of the 11 members possess experience

and skills in this field. Moreover, all members of the Board have expertise and skills in information security.

BOARD OF DIRECTORS

**11**  
members of Greek Nationality





Evaluation of the Board of Directors and its Committees

The Company continuously monitors the individual and collective suitability of the Board of Directors (BoD) members, particularly to identify situations where reevaluation of their suitability is deemed necessary. Specifically, reevaluation is conducted in the following cases:

- When doubts arise regarding the individual suitability of BoD members or the appropriateness of the Board’s composition.
- In cases of significant impact on the reputation of a BoD member that could materially and negatively affect the Company.
- Whenever an event occurs that could significantly impact the suitability of a BoD member, including instances where members fail to comply with the Company’s [Conflict of Interest Policy](#).

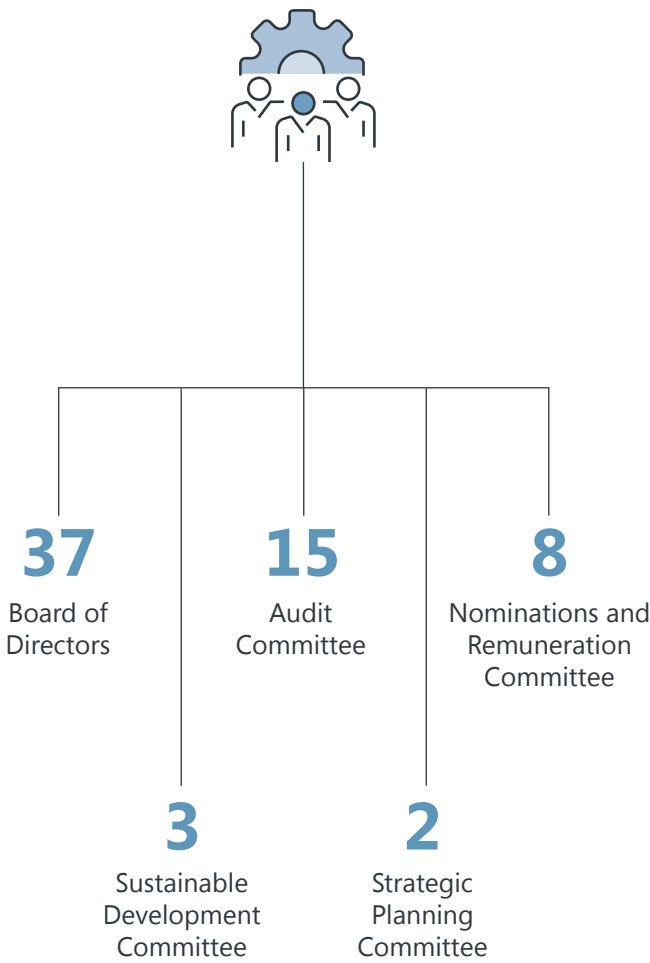
The Company bears the primary responsibility for identifying gaps in collective suitability, while the Board of Directors, with the support of the Nomination and Remuneration Committee, conducts an annual evaluation of its effectiveness, the fulfillment of its duties, and those of its committees. The collective evaluation considers factors such as the composition, diversity, and effective collaboration of the BoD members in fulfilling their responsibilities.

The Board of Directors also evaluates the performance of its Chairperson, a process led by the Nomination and Remuneration Committee.

During individual assessments, criteria for suitability as outlined in the relevant Suitability Policy are considered, including adequacy of knowledge and skills, guarantees of integrity and reputation, independence of judgment, availability of sufficient time.

The results of the Board’s evaluation are communicated to the Board and are taken into account in its deliberations on matters such as composition, the onboarding plan for new members, and other related issues. Following the evaluation, the Board takes measures to address any identified weaknesses.

BOARD AND COMMITTEE MEETINGS 2023



Audit Committee

The purpose of the [Audit Committee](#) is to assist the Board of Directors in overseeing and supervising (a) financial reporting, (b) internal control systems, (c) internal audit, risk management, and regulatory compliance units, as well as the overall effective governance of the Company and its subsidiaries under its control, as stipulated by law, and (d) statutory auditors in accordance with 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 at the date of publication of this Report is provided in the table below:

Panagiotis Alamanos	Chairman of the Committee (Third Party – Independent)
Athina Chatzipetrou	Member of the Committee (Independent - Non-Executive Member of the BoD)
Dr. Eugenia (Jenny) Leivadarou	Member of the Committee (Independent - Non-Executive Member of the BoD)

All the aforementioned members have proven adequate knowledge in the field in which the Company operates. Additionally, the Chairman of the Audit Committee, Mr. P. Alamanos, along with members Ms. A. Chatzipetrou and Dr. Eugenia Leivadarou (Independent Non-Executive Members of the Board of Directors), meet the independence requirements stipulated in Article 9 of Law 4706/2020. Furthermore, at least one member of the Audit Committee has demonstrated sufficient expertise in auditing or accounting. Specifically, the Chairman of the Audit Committee, Mr. Alamanos, is a Certified Public Accountant (Registry No. SOEL 38101).

The tenure of the aforementioned Audit Committee members coincides with the term of the elected Board of Directors. Their term is five years, beginning on the date of their election, i.e., 27 January 2021, and ending upon the election of the new Board of Directors by the Annual General Meeting of Shareholders in 2026.

More detailed information regarding the composition and functioning of the Audit Committee is available on the Group’s [website](#) and in the [2023 Annual Financial Report](#).



Nominations and Remuneration Committee

By decision of the Company's Board of Directors dated 27 April 2021, the [Nominations and Remuneration Committee](#) was established. Its purpose is to assist the Board of Directors in implementing the Company's [Remuneration Policy](#), aligning with prevailing market trends regarding compensation levels and human resource management, and to propose suitable candidates for Board membership when necessary.

The composition of the Nominations and Remuneration Committee as of the publication date of this report is presented in the table below:

Athina Hatzipetrou	Chair of the Committee (Independent - Non-Executive Member of the Board)
Aristides Xenofos	Member of the Committee (Independent - Non-Executive Member of the Board)
Odysseas Christoforou	Member of the Committee (Independent - Non-Executive Member of the Board)
Dr. Eugenia (Jenny) Leivadarou	Member of the Committee (Independent - Non-Executive Member of the Board)

Further information regarding the composition and functioning of the Nominations and Remuneration Committee is available on the Group's [website](#) and in the [2023 Annual Financial Report](#).



Strategic Planning Committee

On June 30, 2022, the Board of Directors of the Company established the [Strategic Planning Committee](#). The Committee is responsible for evaluating and monitoring the execution of the Group's budget and operational plan, formulating proposals for new activities and investments, and exploring potential new areas of development.

The composition of the Strategic Planning Committee as of the publication date of this Report is as follows:

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

More information regarding the composition and functioning of the Strategic Planning Committee is available on the Group's [website](#) and in the [2023 Annual Financial Report](#).

Sustainable Development Committe

On November 30, 2021, the Board of Directors of the Company established the [Sustainable Development Committee](#) at the Group level. The Sustainable Development Committee comprises the Chairman of the Board of Directors, the Chief Executive Officer, an independent non-executive director specialized in natural resource management and energy transition, and the Group's Head of Strategic Development.

Georgios Mylonogiannis	Chairman of the Committee (Non-Executive Member of the Board)
Efthymios Bouloutas	Member of the Committee (CEO - Executive Member of the Board)
Dr. Eugenia (Jenny) Leivadarou	Member of the Committee (Independent - Non-Executive Member of the Board)
Aphrodite Avramea	Member of the Committee

The purpose of the Sustainable Development Committee is to support the Group's commitment to continuously increasing its positive impact on the economy, society, and the environment, thereby creating added value for all its stakeholders. The committee is responsible for the approval, implementation, and monitoring of the Group's Sustainable Development Strategy and its sustainable development roadmap. It also evaluates the effectiveness of the Sustainable Development Policy approved by the Board of Directors and ensures the allocation of resources necessary for its implementation.

Additionally, the committee oversees actions related to the Group's sustainable development and ensures that environmental and social practices align with both the Group's Sustainable Development Strategy and the policies approved by the Board of Directors.

Further information regarding the composition and operation of the Sustainable Development Committee can be found on the Group's [website](#) and in the [2023 Annual Financial Report](#).



CORPORATE GOVERNANCE POLICIES

The Company's Board of Directors places significant emphasis on Corporate Governance matters, aiming to adopt and operate systems and processes that optimize the Corporate Governance System. Within this framework, the Board has adopted a range of policies, including the [Sustainability Policy for Members of Board of Directors](#), the [Conflict of Interest Policy](#), the [Board of Directors' Remuneration Policy](#), the Corporate Governance System (CGS) Evaluation Policy, and the [Rules of Operation of the Board of Directors](#), among others. These policies are further elaborated through procedures and forms to ensure their practical implementation.

GOVERNANCE OF SUSTAINABLE DEVELOPMENT

As the ELLAKTOR Group considers the promotion of sustainability across its structure, including its value chain, as one of its most critical issues, it has established a corporate governance framework to oversee progress toward the ESG goals that have been set and to integrate the concept of sustainability throughout the organization.

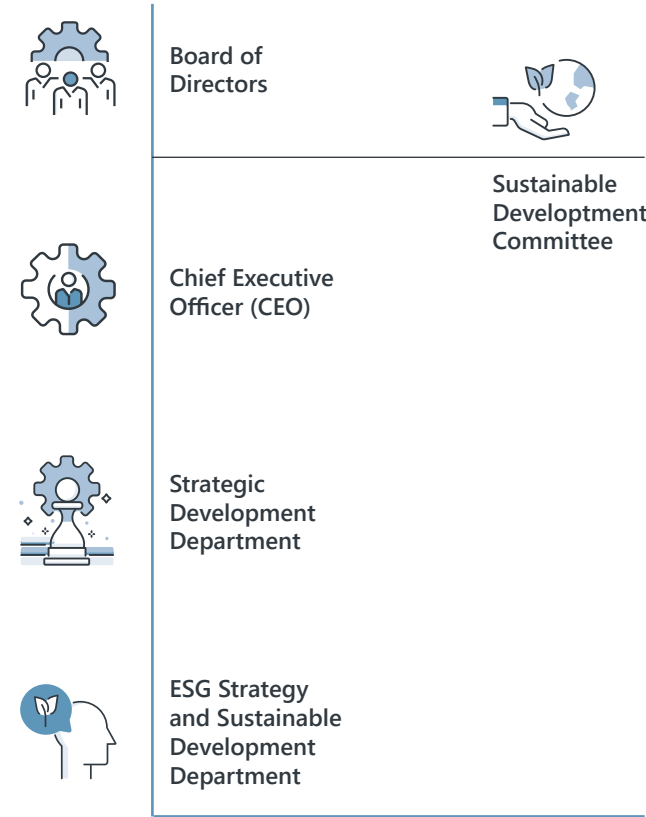
The Company's Board of Directors is responsible for adopting and approving the Sustainable Development Policy and ensuring its implementation across the Group's companies, with the assistance of the Sustainable Development Committee and the ESG Strategy & Sustainable Development Directorate.

More information about the Group's Sustainable Development Committee can be found in the section [«Evaluation of the Board of Directors and its Committees.»](#)

The ESG Strategy & Sustainable Development Directorate acts as the central hub for strategic planning and the proposal of recommendations to the Sustainable Development Committee and Group Management regarding environmental, social, and governance matters. It implements the ESG strategy action plan in collaboration with relevant departments and business units, prepares the Group's Annual Sustainable Development Report, and monitors sustainability performance indicators to ensure their con-

tinuous improvement. This Directorate reports to the Group's Strategic Development Division.

It is worth noting that, following the Extraordinary General Assembly of the Company's shareholders on April 24, 2023, the Remuneration Policy was updated to include additional performance targets related to sustainability. These include objectives in areas such as employee health and safety, digital transformation, corporate social responsibility, environmental and social matters, as well as governance issues.



Compliance

Compliance is an autonomous function that promotes sound governance practices and standards of integrity within the Group. Its mission is to effectively establish a corporate culture of integrity across the entire ELLAKTOR Group, emphasizing ethics and grounded in high standards of business conduct, transparency, confidentiality, and regulatory compliance.

The Compliance function, responsible for designing and implementing the Compliance Management System, reports through the Vice President to the Group's Board of Directors. This structure underscores the Group's clear commitment to integrity and transparency.

Management ensures that all corporate activities comply with legal requirements, uphold high standards of responsible business practices, and foster trust between the Group and its stakeholders (employees, customers, suppliers, partners, regulatory and institutional authorities, etc.). This is achieved by adhering consistently to the Group's principles and values and maintaining zero tolerance for non-compliance actions.

The primary compliance risks identified include potential impacts arising from unethical or unlawful actions carried out on behalf of the Group by employees or business partners, namely:

1. risks of legal or regulatory penalties leading to financial losses and/or reputational damage due to the Group's inability to comply with laws, regulations, standards, codes, policies, and procedures,

2. risks related to potential violations of human rights or other environmental and social risk factors,
  3. risks arising from potential inefficiencies in the handling, management, and oversight of compliance-related reports and monitoring processes.
- The effective management of these risks is achieved through the implementation of relevant Policies, Procedures, and Management Systems, as well as by conducting educational programs on related topics and carrying out scheduled compliance audits.
- The Company has developed a Compliance Management System to enrich its corporate culture and focus on future priorities. To this end, it has established specific priorities and goals regarding integrity and ethical compliance, which are integrated into the annual Compliance Action Plan and fully aligned with corporate values.
- The Company has established and applies a [Compliance Management System](#) aimed at ensuring alignment with the applicable regulatory and legislative framework, the Code of Ethics, and the compliance policies and procedures approved by the Company's Management. This system ensures the operation of the organization based on the values of integrity and transparency. This system is certified under ISO 37301:2021, which also incorporates the standards of the certified ISO 37001:2016 (Anti-Bribery Management System) and ISO 37002:2021 (Whistleblowing Management System).



## INTEGRITY COMPLIANCE PROGRAM

To successfully implement the Compliance Management System, the ELLAKTOR Group has developed an Integrity Compliance Program. This program incorporates a series of compliance measures and safeguards aimed at ensuring full adherence to applicable legislation and regulatory frameworks.

As part of the Integrity Program, and recognizing the importance of knowledge exchange and best practices, the ELLAKTOR Group has undertaken a series of initiatives in this direction. Some indicative actions are presented below:

- **Design and implementation of the annual compliance audit program as well as the annual training program for the Group's subsidiaries,** covering topics related to a) Data protection and compliance with personal data regulations and b) whistleblowing management and reporting mechanisms, ensuring integrity and ethical practices.
- **Development and implementation of a risk-based compliance inspection program in collaboration with the Risk Management Department.** Specifically, these inspections focused on a) the Anti-Bribery Management System of REDS, b) the Compliance Management System of ELLAKTOR, c) the Reporting Management System of ELLAKTOR, d) The Integrity Clause in contracts of AKTOR CONCESSIONS and HELECTOR with third parties and e) the Conflict of Interest Procedure of ELLAKTOR.
- **Development of a Third-Party Due Diligence Policy** enabling both the monitoring of integrity risks originating from third parties and the inspection and assessment of their compliance with laws, regulations, standards, values, ESG goals, and other rules.

As part of its efforts to promote integrity and transparency in all aspects of its business operations, the ELLAKTOR Group openly declares its commitment to operate with transparency and corporate ethics. The Group adopts specific policies and practices of good governance while maintaining its participation in the «Association of Certified Fraud Examiners (ACFE) Corporate Alliance», aimed at combating fraud.

## Codes & Policies

To implement the Compliance Management System, regulatory documents (e.g., codes, policies, procedures, manuals, etc.) have been developed and are applied across all operations of the ELLAKTOR Group. Specifically, the Regulatory Compliance function is carried out through Compliance Policies, training programs, and the oversight of documents to which the Group is contractually bound.

Integrity and Regulatory Compliance are ensured through the parallel and complementary application, as well as the thorough and effective monitoring, of the following regulatory documents. These documents are made publicly accessible on the Group's website for all stakeholders:

- ▶ **Rules of Operation**
- ▶ **Code of Ethics**
- ▶ **Code of Conduct for Business Partners**
- ▶ **Conflict of Interest Policy & Procedure**
- ▶ **Reporting Policy & Procedure**
- ▶ **Anti-Corruption Policy**
- ▶ **Third-Party Due Diligence Policy**

It is highlighted that the Code of Ethics and the Code of Conduct for Business Partners are available in four languages: Greek, English, Romanian, and Arabic. This aligns with the Group's strategic planning and is accompanied by corresponding Policies and Procedures. Additionally, it is worth emphasizing that, specifically for the Group's employees, they are required to formally declare, at the time of their employment,

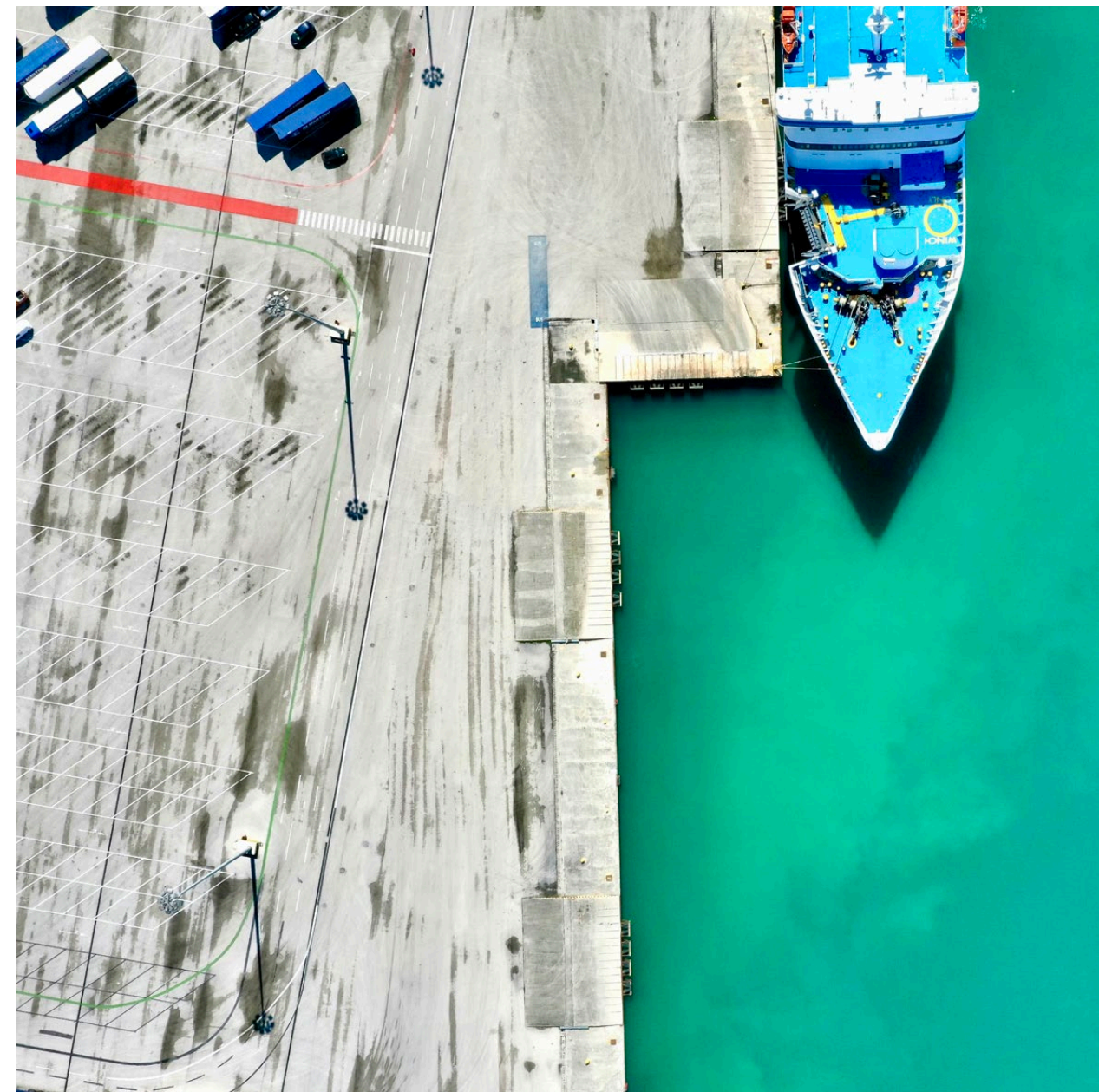
that they have read, understood, and comply with the Code of Ethics, the Code of Conduct for Business Partners, the Integrity Compliance Program, the Anti-Corruption Policy, and other related Policies.

The Company's **Rules of Operation** incorporate the Corporate Governance principles adopted by ELLAKTOR, aligning with its corporate profile, purpose, activities, structure, organizational chart, and internal Policies and Procedures.

The **Code of Ethics** includes the fundamental principles, rules, and values shaping the framework of corporate activities, which, in turn, determine daily behavior. It establishes the standards, ethical values, and expectations the Group has of its management, employees, and third parties interacting with the organization. The effectiveness of the Code is reviewed every two years by the Company, while the Board of Directors oversees its effective implementation.

The **Code of Conduct for Business Partners** establishes the integrity standards expected from all the Group's partners and is fully aligned with the **Code of Ethics**.

A detailed description of the Compliance Program for Integrity, as well as the aforementioned Policies and Procedures, can be found on the Group's [website](#).





## Combating Corruption & Bribery

ELLAKTOR complies with all applicable anti-corruption laws and conducts its business activities with transparency. Notably, all companies within the Group implement the above-mentioned Anti-Bribery Management System. The fundamental principles against corruption and bribery are included in the [Code of Ethics](#).

Demonstrating its commitment to zero tolerance for corruption, bribery, and all forms of unethical practices and illegal activities, the ELLAKTOR Group has additionally adopted a distinct Anti-Corruption Policy. This policy provides clear guidelines and directions for integrating its provisions into all activities. The [Anti-Corruption Policy](#) works complementarily with the Code of Ethics, the Code of Conduct for Business Partners, the Third-Party Due Diligence Policy, the Whistleblowing Policy, the Conflict of Interest Policy, and the Donations and Sponsorship Policy. It is an integral part of the Compliance Program for Integrity. As part of this Program, the ELLAKTOR Group has developed a methodology for identifying, assessing, and managing integrity risks. These risks are broken down into specific categories, identified based on various factors (e.g., external environment, functions, activities, etc.), and assessed according to their likelihood and impact.

A testament to the completeness, adequacy, and effectiveness of the aforementioned system is that in **2023**, no cases reached court involving the Group or its employees in matters of corruption, bribery, or anti-competitive behavior. Furthermore, the Group did not terminate any collaborations with employees or partners regarding related issues. Additionally, in 2023, no confirmed incidents of money laundering or leaks of internal information were recorded.

## Conflict of Interest Policy & Procedure

The [Conflict of Interest Policy](#) aims to ensure compliance with a) the applicable legal and regulatory framework for situations of conflict of interest, and b) the Group's internal policies and procedures. It defines conflicts of interest and their categories, encourages the confidential reporting of any incident or reasonable suspicion through the communication channels established

by the Group, and promotes awareness and vigilance among employees and partners for recognizing actions associated with conflict of interest situations.

The Conflict of Interest Management Procedure aims to establish and implement a framework of processes, mechanisms, and systems for managing conflict of interest situations. It defines the necessary procedures for taking preventive measures, as well as measures for managing such situations to prevent, as far as possible, their recurrence in the future. As part of this procedure, the Obligated Persons are informed about their obligations arising from the Conflict of Interest Policy, sign, complete, and annually update the «Declaration of Absence or Disclosure of Conflict of Interest» form. Due diligence actions are conducted to verify the content of these declarations, any potential conflicts of interest are investigated/evaluated by the Regulatory Compliance Department, and a «Conflict of Interest Register» is maintained.

In 2023, no confirmed conflict of interest incidents were recorded.

## Reporting Policy & Procedure

To facilitate the reporting of potential violations of the Code of Ethics, Policies, and applicable legislation, the Group has updated its Reporting Management Policy. This policy outlines the principles and operational framework for receiving, managing, and investigating expressions of concern, complaints, or named and/or anonymous reports of any irregularities, omissions, or criminal acts brought to the attention of employees, customers, suppliers, or other third parties. The Reporting Management Policy applies to all Group companies. The stages of submission, management, investigation,

evaluation, resolution, and monitoring of reports are included in the Reporting Management Procedure. Specifically, this procedure is carried out within a short timeframe, and final resolution decisions are collective, taken on a case-by-case basis by the Heads of the respective responsible Divisions of the Group. These decisions depend on the nature and content/topic of the report, the individual(s) involved and their position/role, and the severity of the incident. The process is thoroughly documented and follows an in-depth investigation.

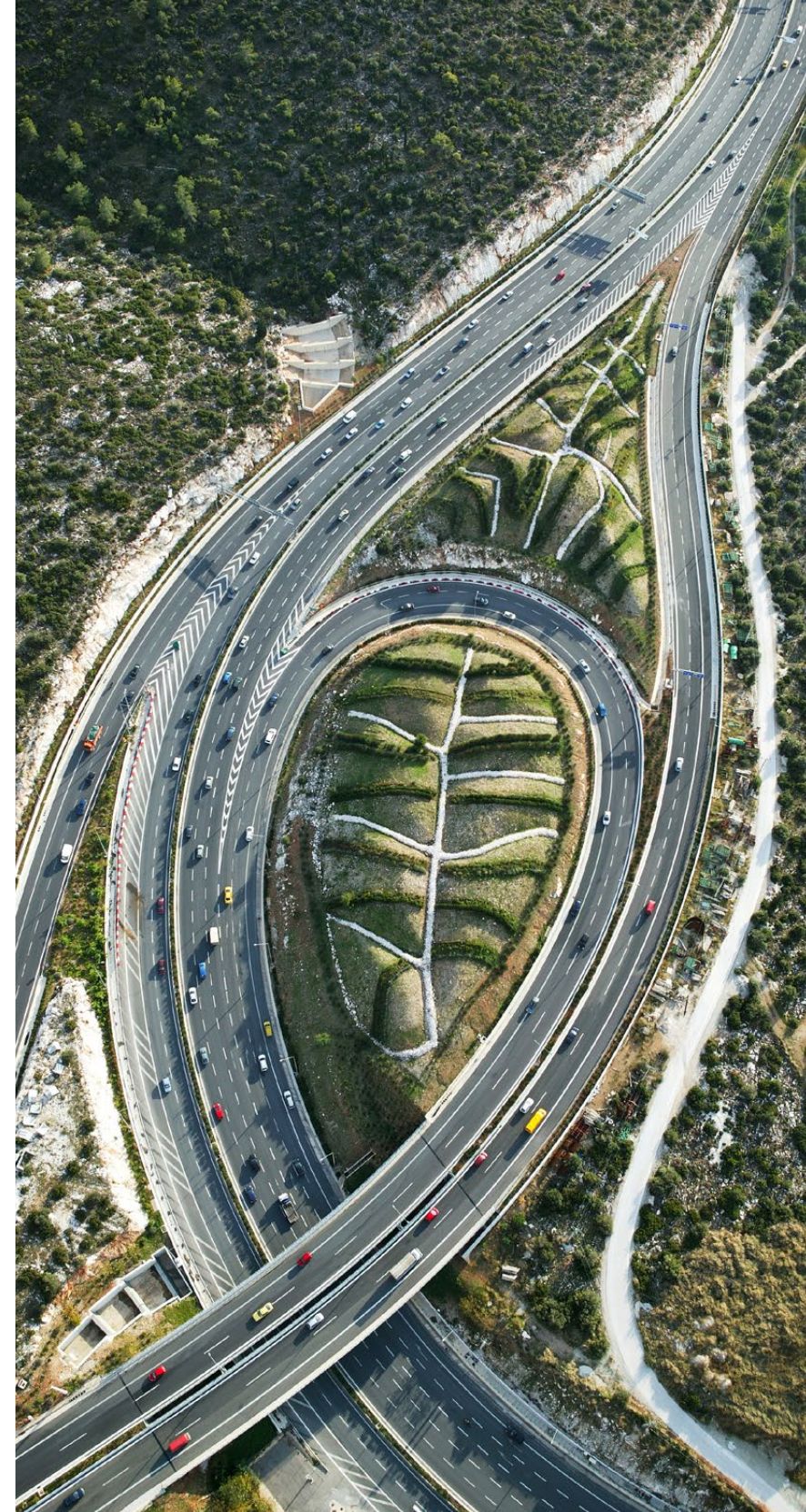
To facilitate the reporting of potential violations of the Code of Ethics, Policies, and applicable legislation, the Group has updated its [WhistleBlowing Policy](#). This policy outlines the principles and operational framework for receiving, managing, and investigating expressions of concern, complaints, or named and/or anonymous reports of any irregularities, omissions, or criminal acts brought to the attention of employees, customers, suppliers, or other third parties. The Reporting Management Policy applies to all Group companies.

The stages of submission, management, investigation, evaluation, resolution, and monitoring of reports are included in the Reporting Management Procedure. Specifically, this procedure is carried out within a short timeframe, and final resolution decisions are collective, taken on a case-by-case basis by the Heads of the respective responsible Divisions of the Group. These decisions depend on the nature and content/topic of the report, the individual(s) involved and their position/role, and the severity of the incident. The process is thoroughly documented and follows an in-depth investigation.

The Group provides alternative communication channels (phone, email, the electronic platform [Talk2Ellaktor](#), postal mail, etc.), through which relevant reports can be submitted in a secure and user-friendly manner, either anonymously or with full identification. All reports are handled confidentially and without fear of retaliation against any reporter acting «in good faith» or based on reasonable belief or suspicion of any irregularities, omissions, or criminal acts. This platform is managed by an independent third party.

The Board of Directors is informed of these matters during its meetings as needed and annually.

In 2023, there were no reports of irregularities, omissions, misconduct, or other criminal acts brought to the attention of any individual professionally associated with the Group, specifically employees, customers, suppliers, or other third parties.





### Third-Party Due Diligence Policy

The Group is committed to upholding high standards of integrity in all its business operations and activities. It has established a framework and criteria for the creation, continuation, and monitoring of relationships with third parties to ensure that they meet the integrity standards and ESG (Environmental, Social, and Governance) principles of the Company. The Third-Party Due Diligence Policy enables both the monitoring of integrity risks originating from third parties and the inspection and evaluation of their compliance with laws, regulations, standards, the Group's values, ESG goals, and other rules.

Specifically, prior to entering into any business relationship with partners, due diligence procedures are implemented to identify and assess business associates involved in incidents or cases of corruption, fraud, money laundering, or similar integrity risks. These due diligence procedures include, among other things, targeted compliance checks on third parties, regulatory compliance risk assessments, identification of warning signs (red flags), and financial/accounting audits.

Additionally, it is noteworthy that for the purposes of assessing integrity risks for third parties and conducting related integrity checks, an electronic platform is utilized. This tool incorporates a risk-based evaluation process for third parties and ensures their ongoing monitoring throughout the business relationship. It focuses on issues such as corruption and bribery, negative information, or sanctions related to cybersecurity, the environment, society, etc.

### Personal Data Protection

The Group's approach to managing personal data and ensuring the protection of the rights and freedoms of individuals when their data is processed fully complies with the General Data Protection Regulation (EU) 2016/679 (GDPR) and Greek Law 4624/2019. In 2023, the relevant policies and procedures were reviewed to deepen and strengthen the protection framework in alignment with all principles and legality requirements established by the GDPR and applicable national legislation.

The [Data Protection Policy](#), in conjunction with the maintained Record of Processing Activities for the Group's companies, includes all principles governing the processing of personal data conducted by the Group, related obligations, the rights of data subjects, and the necessary security measures. Additionally, the Data Protection Policy incorporates the Procedure for Exercising and Managing Data Subject Rights, the Data Retention and Deletion Procedure, and the Personal Data Breach Management Procedure. The Data Protection Policy is published on the Group's website.

Beyond compliance actions with the GDPR, specific data protection issues that arose during the Group's normal operations were addressed. All requests were resolved without further action from the requesters.

In 2023, no incidents of personal data breaches involving the Group's customers were recorded.

### Training

Training on Regulatory Compliance and Integrity is conducted through specialized training programs, held at regular intervals and throughout the duration of each employment relationship or other collaboration. These programs are delivered via an online learning platform (e-learning), accessible to all Group employees, as well as through in-person training seminars.

In 2023, two training programs were designed and implemented on the online platform, covering topics related to Personal Data Protection and Whistleblowing Management. Additionally, in-person training sessions were conducted for the Group's subsidiaries, focusing on Integrity-related topics, with an emphasis on Whistleblowing and Anti-Bribery policies.

Specifically, in 2023, a total of 283 hours of training on Regulatory Compliance and Ethics were provided to 23 employees, of whom 39% held managerial positions. The gender distribution of participants was 57% male (13 employees) and 43% female (10 employees).

The training programs covered a range of topics, including:=-

1. The importance and implementation of the Code of Ethics and the Code of Conduct for Business Partners.
2. The role of Regulatory Compliance, particularly in achieving integrity objectives, as well as the Regulatory Compliance Program for integrity.

3. Fundamental concepts and forms of corruption and financial crimes, including bribery, fraud, embezzlement, market abuse, coercive and collusive practices, money laundering, cybercrime, environmental crimes, and tax evasion.
4. The Anti-Bribery Policy and the whistleblowing reporting procedures available through multiple communication channels.
5. The importance of internal controls in preventing, detecting, and addressing corruption incidents.

Through the systematic implementation of training initiatives, the Group aims to: a) Enhance understanding of relevant Codes, Policies, and Procedures, b) Raise awareness and provide continuous updates on various forms of corruption, and c) Foster and strengthen the corporate culture within the Group to prevent and combat corruption effectively.





# Risk Management

The Board of Directors defines and oversees the implementation of the Corporate Governance System (CGS), which includes the Internal Control System (ICS). The ICS comprises all internal control mechanisms and procedures, including Risk Management, Internal Audit, and Regulatory Compliance. The Board ensures the adequate and effective operation of the ICS, aiming primarily at the following objectives: a) the consistent execution of business strategy through the efficient use of available resources, b) the identification and management of key risks associated with business activities and operations, c) the effective functioning of the internal audit unit, d) ensuring the completeness and reliability of financial and non-financial data and information required for the accurate and timely determination of the Company's financial position and preparation of reliable financial statements, and e) compliance with regulatory and legal frameworks as well as internal corporate policies.

As per institutional provisions and the current organizational structure, the Group's Risk Management Department reports directly to the Chief Executive Officer (CEO) and, through the CEO, to the Board of Directors. It provides impartial reports and updates regarding risk-related matters, the degree of compliance with the [Enterprise Risk Management Policy](#), the results of risk assessment processes, the operation of risk management and response procedures, and the monitoring of risk evolution, thereby offering a comprehensive overview of the Group's risk profile.

The scope, scale, and complexity of the Group's activities necessitate a comprehensive and sophisticated risk management approach. Prevention and effective risk management form an integral part of the Group's strategy. To ensure transparent, secure, and reliable corporate operations concerning risk management, Greek legislation has incorporated European Commission and Council directives (EU 2017/828 & 2017/1131). The Group has fully aligned with the applicable legal and regulatory framework (Law 4706/2020 and Decision E.C. 1/891/30.9.2020) and adheres to the respective directives. Furthermore, the Group has integrated the principles of

ISO 31000:2018 & ISO-IEC Guide 73 into its processes, alongside best industry practices.

In this context, the Group has adopted an Enterprise Risk Assessment (ERA) methodology, tailored to its business needs and risk profile. This approach fosters a unified corporate culture, integrating risk management into business processes, activities, and decision-making at all levels. The methodology is consistently applied across all business segments, central services, and operational units and follows the steps outlined below:





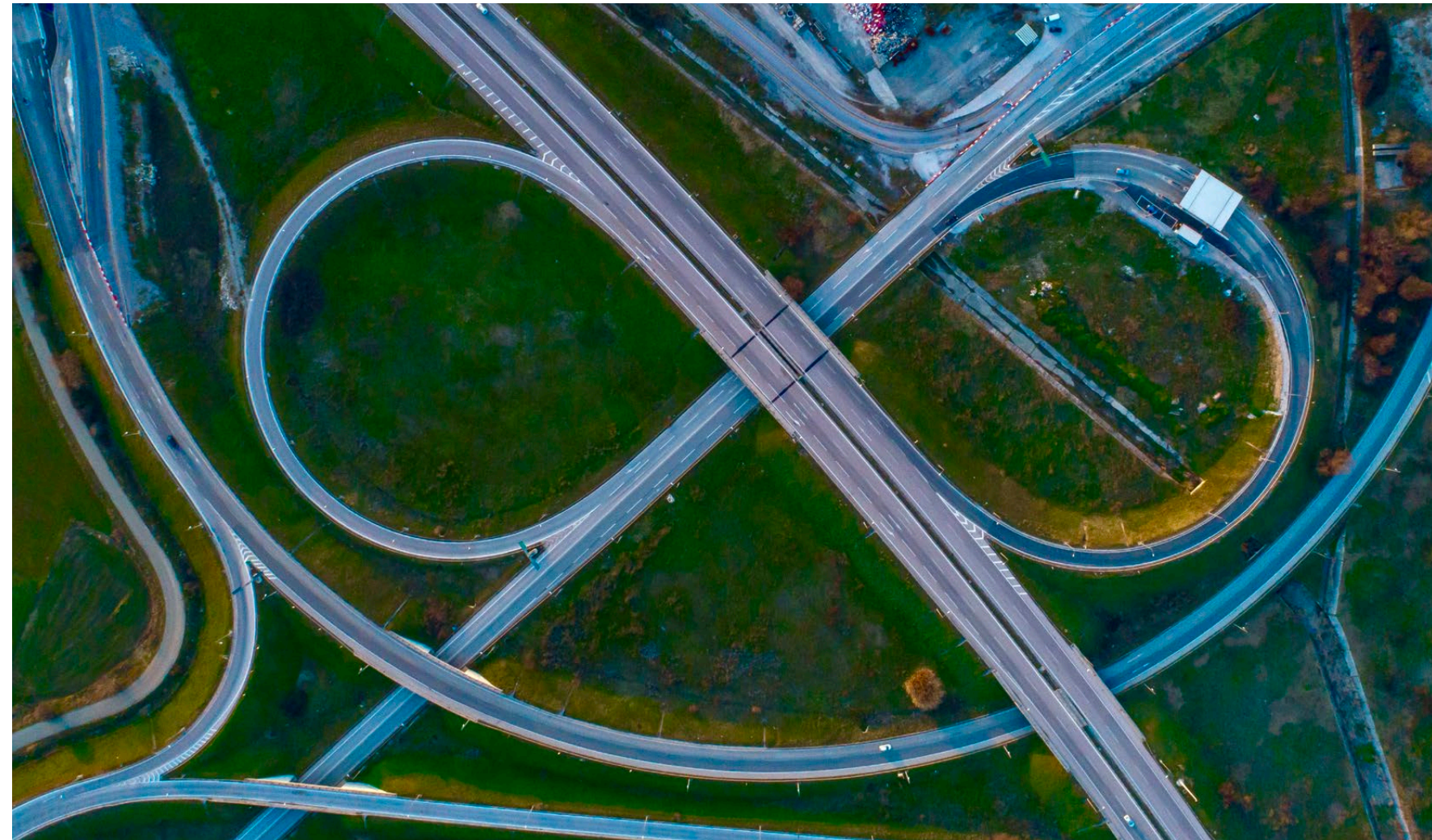
Risk management encompasses all processes, methodologies, and procedures aimed at identifying, recognizing, analyzing, evaluating, and addressing risks across the Group's entire range of activities. It is a dynamic and continuous process, systematically implemented by all personnel, regardless of hierarchical level, to ensure effective corporate risk management. This process applies to all identified and assessed risks, recorded in the Risk Register, while also continuously detecting potential emerging risks in alignment with the risk appetite approved by the Board of Directors. The ultimate objective of risk management efforts is to minimize unexpected deviations from corporate goals to the greatest extent possible.

The Board of Directors leverages the Internal Control System (ICS) to safeguard the Group's assets, ensure operations are conducted in accordance with the Code of Ethics with a strong emphasis on integrity, and oversee Regulatory Compliance. Furthermore, it assesses emerging risks across all functions, providing accurate and comprehensive information to shareholders regarding the Group's actual position and future outlook. This includes the documentation of the Group's risk profile and the strategies employed to mitigate identified risks. The Internal Audit function validates the adequacy and effectiveness of both Regulatory Compliance and Risk Management.

The Management oversees the systematic identification and assessment of risks that impact the Group's business activities. Additionally, it approves the development and timely implementation of risk mitigation plans, following a detailed cost-benefit analysis. Management also regularly evaluates the effectiveness and necessity of adapting risk mitigation plans to achieve optimal risk management.

The Group companies that have developed ISO-certified management systems, incorporating a risk-based approach, identify potential threats and opportunities related to their activities and integrate them into their strategic planning. The common risk management approaches include: avoidance, mitigation (reducing frequency and/or impact) and transfer, aiming to ensure that the residual risk remains acceptable. The risks recorded are primarily classified into the following main categories: geopolitical / market risks, financial risks, social / health & safety / human resources / reputation & customer risks, technological risks, legal / compliance risks and environmental risks.

**Strategic risk** relates to the business choices of the Group, which are influenced by broader external risks that are taken into account during the decision-making process. These risks pertain to political and economic systems of societies, governmental changes and policies leading to instability or population displacements, legislative changes, sanctions, and military conflicts. Such factors create a constantly evolving external environment, which may pose a threat to the Group's activities by affecting the supply chain, the financial performance of operations, and the safety of employees and partners.



The Group mitigates this risk by ensuring the regular provision of the necessary timely, accurate, and well-documented information to Management while simultaneously gathering feedback on the progress and development of significant projects and the implementation of decisions. Recognizing that the quality of information and data provided to support a decision is reflected in the quality of the decision itself, Management analyzes the risks involved in its strategic choices with the assistance of experts and consult-

ants, assuming measured risk within the acceptable limits defined by the Group's risk appetite. Furthermore, the acceleration of the implementation of broader projects related to the establishment of monitoring and control processes through IT integration significantly enhances the internal environmental conditions in which the management personnel is required to make its respective decisions.

**Financial risk** generally pertains to any factor that has a direct impact on the financial statements and affects the Group's results. It is managed through the development and establishment of relevant procedures for each function of the Finance Department, with a focus on: gathering verified financial data for the preparation of financial statements (including the income statement and cash flows), recording and managing assets, executing and paying all types of expenses, complying with tax regulations, managing cash flow, and coordinating the Group's overall banking relationships (including renegotiation of pricing and other collaboration terms to optimize benefits for the Group). Additionally, financial risk management involves the monitoring of cash flows by activity.

More specifically, targeted risk management measures include:

- ▶ **Liquidity risk:** addressed through weekly cash flow planning for a rolling 30-day period, as well as a monthly liquidity needs assessment covering a six-month period, in accordance with established accounting department procedures.
- ▶ **Interest rate risk:** managed through hedging strategies covering nearly all long-term debt.
- ▶ **Foreign exchange risk:** neutralized by matching receivables with obligations in the same currency (e.g., aligning receivables with loan repayments in the same currency).
- ▶ **Credit risk:** considered low, as the Group's counterparties are primarily government entities and a limited number of highly creditworthy private entities.





**IT risk** pertains to the security of networks, information and operational systems, data integrity and protection, safeguarding of sensitive information, and the smooth operation of business activities. A potential breach could impact the Group's reputation, its uninterrupted operations, and its overall competitive position. Additionally, a cyberattack could negatively affect the financial condition and operating results of the Group.

The Group has established a comprehensive information security framework aimed at optimally protecting IT systems and data. An IT Policy has been instituted, aligned with the Group's medium- and long-term strategic plan, alongside relevant procedures that define investment plans in this area to ensure the secure support of business objectives. This includes the development of security enhancement programs for data and applications, with the assistance of external partners, as well as the implementation of a disaster recovery program within the business continuity plan. This program is regularly tested, updated, and improved to align with the Group's evolving operational needs. Additionally, the Group has implemented a structured and continuous awareness and training program on information security. This program is applied across the entire organization, ensuring that all employees understand IT risks and recognize their responsibility in safeguarding data, systems, and business operations.

**Health and safety risk** is of importance because it directly affects human life. Health and safety are core values and a primary concern for the Group, embedded in all strategic decisions and integrated across all business activities. The Group continuously invests in

the protection and preservation of health and safety. Detailed information on how the Group manages and responds to this risk is provided in the "[Society](#)" section.

**Environmental risk** pertains to extreme natural events, long-term natural changes, and transition risks associated with significant political, legal, technological changes, and measures aimed at adapting to and mitigating the effects of climate change. It also involves the Group's ability to effectively transition to a lower-emission economy by implementing the necessary operational adjustments. Detailed management and response strategies for this risk are discussed in the "[Environment](#)" section.

**Regulatory compliance** risk involves the failure to maintain legal and regulatory compliance across business, contractual, labor, social, environmental, and product (goods or services) levels. Detailed information on how the Group addresses and responds to this risk is available in the "[Regulatory Compliance](#)" section.

**Operational risk** is inherent in every function of the organization and arises from faulty or inadequate processes that lack sufficient safeguards. This risk is managed through the development of processes for all the Group's activities and operations, incorporating the necessary principles of dual control and segregation of duties. The processes are developed with the participation of the IT Department to ensure comprehensive implementation of the required safeguards and control mechanisms, aimed at preventing or mitigating risks through lean and digital processes. Additionally, targeted training on these topics is provided to personnel, enhancing the proper application and

adherence to these processes, thereby achieving the prevention and mitigation of related risks.

**Legal risk** refers to risks of a legal nature arising from the interpretation of contract terms, dispute management, and legal proceedings, including litigation, arbitration, and other legal conflicts. Potential mismanagement of legal matters may lead to claims against the Company, loss of rights, or the creation of adverse conditions that could negatively impact its standing.

Regarding **ESG & Climate Risk Management**, a detailed report is provided on the Group's approach to risk management and response within the sections «[ELLAKTOR Group](#)» and «[Environment](#)».

## RISK PROFILE

The risk profile is aligned with the nature of the Group's activities and is oriented toward its business objectives, while remaining within the defined risk appetite. The risk appetite is periodically reviewed, or whenever necessary, to incorporate new activities and changes in internal and external conditions. On an ongoing basis, the Risk Register is also updated in response to new events, incidents, and changes, both in terms of the types of risks recorded and the evaluation of key risk parameters, such as risk likelihood (frequency of occurrence) and risk impact, which ultimately determine risk criticality..



RISK APPETITE

The Group’s Management has defined the desired risk appetite for key risk categories. Specifically, the table below presents the eight (8) main risk categories along with their subcategories. The response to risks can be of three types: preventive (with control points that anticipate and prevent potential issues at their root), corrective (where corrective mechanisms are activated once a problem arises), or hybrid, combining both prevention and correction. The Group’s stance toward a specific risk can be risk averse, risk avoidance, risk tolerance, risk neutral, ad hoc, or risk seeking, and is determined proportionally to the business strategic planning. The Organization’s response to risk (risk response) refers to the management actions taken to either eliminate the risk or minimize its frequency and impact as much as possible. The outcome of these actions aims to align the Group’s risk profile within the risk appetite framework set by Management, while also considering the Organization’s risk-bearing capacity.

Risk Category	Response Type Preventive / Cor- rective / Hybrid	Stance Risk Averse / Avoidance / Tolerance / Neutral / Ad Hoc / Seeking Opportunities	Risk Appetite	Response Actions
<b>STRATEGIC RISK</b> Geopolitical, Country, Market, Industry	Hybrid	Tolerance, Ad Hoc & Opportunity Seeking	<div><div></div><div></div><div></div></div>	Preparation, risk identification & analysis, tolerance setting, risk management & opportunity seeking
<b>OPERATIONAL RISK</b> Human Resources, Supply Chain, Proj- ect Management, Processes, Systems, BCP	Hybrid	Avoidance	<div><div></div><div></div><div></div></div>	Policies and procedures, compliance monitoring, continuous training and awareness, adaptability to new needs
<b>FINANCIAL RISK</b> Credit, Liquidity, Supplier, Interest Rate, Foreign Exchange, Capital Access, Cost Control	Hybrid	Avoidance & Ad Hoc	<div><div></div><div></div></div>	Policies and procedures, compliance oversight, continuous monitoring, readiness to respond to economic volatility
<b>IT Risk</b> Cybersecurity, Ethical Hacking, IT Risk Management, Data Security, Digital Transformation, DRP	Hybrid	Avoidance & Ad Hoc	<div><div></div><div></div><div></div></div>	Policies and procedures, compliance oversight, continuous training, rapid response to emerging risks

Risk Category	Response Type Preventive / Cor- rective / Hybrid	Stance Risk Averse / Avoidance / Tolerance / Neutral / Ad Hoc / Seeking Opportunities	Risk Appetite	Response Actions
<b>COMPLIANCE RISK</b> Regulatory, Legal, GDPR, Corporate Governance, Anti-Corruption, Integrity & Transparency	Hybrid	Averse & Avoidance	<div><div></div><div></div><div></div></div>	Policies and procedures, compliance monitoring, audits, corporate culture reinforcement, governance alignment
<b>LEGAL RISK</b> Legislation Interpretation, Contracts, Counterparties, Litigation Outcomes	Corrective	Neutral & Ad Hoc	<div><div></div><div></div></div>	Organizational stability mitigates risk, early involvement of legal department, standardized contract terms
<b>HEALTH &amp; SAFETY RISK</b> Individual & Collective Protection	Hybrid	Averse	<div><div></div><div></div></div>	Policies and procedures, strict PPE adherence, continuous training, drills, facility inspections, corporate culture reinforcement
<b>ESG &amp; CLIMATE RISK</b> Sustainability & Environmental Development	Hybrid	Avoidance	<div><div></div></div>	Policies, procedures, actions, reporting systems, training, corporate culture reinforcement

NOTE: For the purpose of assessing the graded criticality of risks, a heat map has been designed and implemented. This heat map is tailored to the Group's business profile and interprets the colors in the «Risk Appetite» column as follows:

Very Low    Low    Medium    High    Very High

For the selection of the eight key risks that define the Group’s risk appetite, data from various risk assessment studies were considered, evaluating the most probable emerging risks both nationally and globally. Specifically, the following risks were identified: a) The five most probable risks that could trigger a global crisis in 2024 are the extreme weather events, AI and misinformation, social and political polarization, cost of living crisis and cyberattacks, b) The ten risks with the most severe impact over the next two years are expected to include misinformation and cybersecurity threats, extreme weather events and pollution, social polarization and interstate conflicts, involuntary migration, inflation, recession, and lack of economic opportunities, while over the next decade, the emphasis will primarily shift towards environmental risks, including extreme weather events, ecosystem changes, biodiversity loss, natural resource scarcity, pollution. Following environmental risks, technological risks will also be significant, particularly AI-related negative outcomes, misinformation, cybersecurity threats and lastly, social risks such as involuntary migration and social polarization will continue to be of high concern.

In general, risk management is a fundamental function for the Group and its subsidiaries, ensuring sustainability and the seamless achievement of business objectives. The Group continually invests in strengthening its risk management capabilities, persistently enhancing its effectiveness through comprehensive training programs for all personnel on business risk management. Additionally, the Group’s familiarity and expertise in risk management enhance its resilience, equipping it with the necessary experience and knowledge to effectively navigate unforeseen challenges.



## Business Continuity

In 2023, the ELLAKTOR Group was certified by an independent body for its Business Continuity Management System (BCMS) in accordance with the requirements of ISO 22301:2019. This certification confirms the uninterrupted continuation of ELLAKTOR's activities, its ongoing engagement with all its projects, and its ability to anticipate potential operational disruptions while protecting itself from the consequences of unexpected events.

The Group develops and maintains Business Continuity Plans (BCPs) to ensure the seamless operation of all critical information systems and, by extension, its key business functions, in the event of a potential disaster. These BCPs are approved by Management and are regularly evaluated and updated to accurately reflect the Group's operational reality, both at a technical and organizational level. The methodology used for the design and implementation of business continuity is based on the following principles:

- ▶ the strategy aligns with the Group's objectives and priorities,
- ▶ the critical functions of the Group are identified and prioritized based on their business importance,
- ▶ the information resources supporting these critical functions are identified, and the maximum recovery time (RTO), along with the required technical procedures (Disaster Recovery Plan - DRP), is determined,
- ▶ the risks affecting these information resources, as well as the business impact of potential threats, are assessed and incorporated into the Business Continuity Plans.

In the context of ISO 22301:2019 certification, ATTIKES DIADROMES S.A. monitors and controls the framework for planning and evaluating Business Continuity requirements for its certified operations. This is achieved through strengthening and systematically monitoring infrastructures and information systems, as well as documenting policies, strategies, and plans. By implementing this approach, the company ensures the continuous operation of the motorway and toll collection systems, adhering fully to industry best practices and technical standards.

### Information Systems

The Group implements an ISO 27001-certified Information Security Management System (ISMS), ensuring confidentiality, integrity, and availability of information. The Group Information Security Officer plays a critical role in data security governance, technological infrastructure protection, and, most importantly, in keeping Management and employees informed on cybersecurity matters.

The ISMS, consisting of Policies, Procedures, and Systems, manages the level of operational risk arising from the Group's reliance on information systems, while ensuring the accuracy and reliability of financial data.

The Group has developed and enforces critical security policies and procedures to protect its IT environment, including:

- User and Access Rights Management
- Password Management
- Backup and Recovery Management
- Security Incident Management
- Remote Work Security
- Regular Vulnerability Assessments and Penetration Testing
- Physical Security of IT Infrastructure
- End-User Security Awareness Training

The Group's IT infrastructure incorporates specialized technical security systems and mechanisms, including:

- Next-Generation Firewall
- Intrusion Prevention System (IPS)
- Internet Access Protection System
- Advanced Endpoint Protection against Malware
- Email Security System
- Network-Level Access Control Mechanism
- Vulnerability Detection System for IT Infrastructure
- Security Information and Event Management (SIEM) System for threat detection and incident response





In the event of information security incidents, the approved incident response procedures are followed. If deemed necessary, the Business Continuity and Emergency Plans can be activated. These plans are regularly reviewed and tested to ensure their effectiveness. Additionally, internal and external audits are conducted to identify vulnerabilities, and appropriate technical measures are implemented to mitigate risks.

Cybersecurity training and awareness among personnel is a top priority. To achieve this, the Group conducts seminars and preparedness exercises through a dedicated training platform. These programs cover external and internal threats, risk awareness, and the identification and reporting of information security incidents.

The Group's technical security systems and mechanisms are monitored continuously (24/7) through a specialized cybersecurity service. This ensures the fastest possible detection and response to security incidents, minimizing potential threats and disruptions.

In 2023, there were no confirmed information security or cybersecurity breaches.

### Emergency response management

In the event of emergency situations, the responsible departments of the Group coordinate their actions in collaboration with subsidiaries' personnel, depending on the nature of the incident. The Group's primary objective is to eliminate accidents and incidents, ensure continuous smooth operations, and minimize any impact on people, the environment, and local communities.

ELLAKTOR prioritizes organizational resilience, implementing coordinated organizational actions that enable the Group to anticipate, respond to, and recover from operational disruptions. This ensures uninterrupted service delivery and the protection of assets and stakeholders from potential disasters.





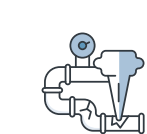

To ensure a safe working environment, Health and Safety Management Plans (H&SMP) are developed before work commences on each project or activity. These plans comply with national legislation and international standards.

Key Components of Health & Safety Management Plans (H&SMP) include:

- ▶ Written Occupational Risk Assessment
- ▶ Emergency Response Plan
- ▶ Emergency Response Team
- ▶ Health & Safety Guidelines and Procedures of the Group

The Emergency Response Plan, as part of the Health & Safety Management Plan, is designed to identify all potential emergency risks and establish response guidelines to ensure a smooth and immediate recovery of operations. The primary objective of the Emergency Response Plan is to define actions and responsibilities within the framework of a project or activity, facilitating the effective management of emergencies and minimizing their impact

The Emergency Response Plan is designed to address a range of critical incidents, including:

	Physical injury (incident)
	Fire
	Adverse weather conditions
	Earthquake
	Hazardous substance spill
	Pandemic

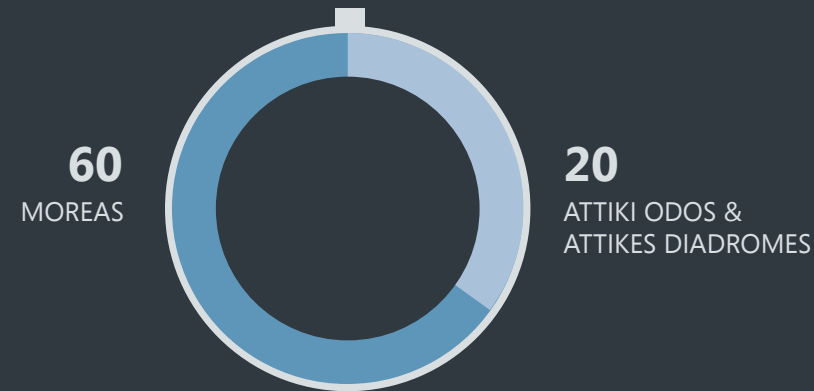
In addition, the Group has established a General Emergency Response Plan, which is activated in the event of a critical incident, including environmental emergencies. For projects where the Group operates, Emergency Response Teams are designated to intervene and manage any emergency situations. The Emergency Response Plans include specific procedures for handling incidents such as marine incidents, flooding, oil/grease/fuel/hazardous waste spills and severe weather conditions.

The Emergency Response Plan outlines the management of emergency situations or potential environmental accidents, detailing required equipment and resources, key contact personnel for each type of incident, internal and external communication protocols.





Contractual Response Time  
(Minutes)



Actual Average Response Time  
2023 average  
(Minutes)



## Concessions Segment

An Emergency Incident must be immediately assessed and addressed by the Emergency Response Team, depending on its severity level and always in accordance with the Emergency Response Plan. Following each emergency event, the plan is reviewed, and potential revisions or updates may be implemented as needed.

Each project/activity's Emergency Response Team undergoes specialized training to prepare for potential risks, such as fires, accidents, or earthquakes. These teams conduct preparedness drills and, in the event of an incident, assess whether external agencies or emergency services (such as National Emergency Response Service, the Fire Department, or the Police) should be engaged, depending on the scale and severity of the situation.

The team members for each project/activity, along with emergency response procedures, evacuation route plans, employee assembly points are clearly documented in the Emergency Response Plan (ΣΕΑ). These details are also included in the introductory safety training for both Group employees and subcontractors, ensuring that all personnel are well-prepared before commencing work.

For the traffic management of the Moreas and Attiki Odos motorways and the handling of incidents, there is case-by-case collaboration with all relevant authorities, including the Police, the Fire Department, the National Emergency Response Service, the Civil Protection Authority, the Public Administration Services overseeing each project, the Regional and Municipal

Authorities along the motorway routes. All actions taken by the two companies are conducted strictly in accordance with the officially approved Operating Manuals for each concession project. As part of this framework, large-scale tunnel emergency exercises are conducted on the Moreas and Attiki Odos motorways. These exercises assess response times and the effectiveness of the involved agencies, while identifying potential challenges and implementing corrective actions. In 2023, a full-scale emergency preparedness drill was successfully conducted in a tunnel on the Corinth–Tripoli–Kalamata motorway and the Lefktro–Sparta branch. The drill involved all designated emergency response agencies, including the Regional Fire Service Directorate of Arcadia, the Megalopolis Fire Department, traffic departments of Eastern and Central Peloponnese Motorways, the Arcadia Police Department, the National Emergency Response Service, Moreas S.A., the Civil Protection Directorate of the Peloponnese Region. This exercise was classified as an Interagency Large-Scale Emergency Preparedness Drill under the codename «SIRAGGA 2023». The equivalent large-scale drill for Attiki Odos took place in November 2022.

The headquarters of ATTIKI ODOS & ATTIKES DIADROMES in Paiania, Attica, and MOREAS in Nestani, Arcadia, are officially recognized as Independent Civil Defense Institutions, approved by the Ministry of Interior. Since 2019, MOREAS has maintained an approved Internal Civil Defense Operations Regulation, which is inspected annually by the competent services of the Police.





# Certified Management Systems

ELLAKTOR Group, committed to ensuring transparency across all its operations and enhancing business efficiency, has developed Management Systems and Procedures, which have been certified according to international standards. By implementing these certified systems, the Group not only ensures compliance with current legislation but also achieves continuous improvement, operational reliability, and enhanced corporate credibility. These systems provide multiple benefits, including safe working conditions, environmental protection, increased productivity and sustainability

The Group’s companies have developed Management Systems and obtained certifications in accordance with the following international standards, depending on their segment and operations:

- ▶ **ISO 9001 – Quality** Management Systems
- ▶ **ISO 45001 – Occupational Health & Safety** Management Systems
- ▶ **ISO 14001 – Environmental** Management Systems
- ▶ **ISO 50001 – Energy** Management Systems
- ▶ **ISO 39001 – Road Traffic** Safety 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 Systems
- ▶ **ISO 27001 – Information Security** Management Systems
- ▶ **ISO 22301 – Business Continuity** Management Systems
- ▶ **ISO 20000 – IT Service** Management Systems



Company (Cont. Operations)	ISO 9001:2015	ISO 45001:2018	ISO 14001:2015	ISO 50001:2018	ISO 39001:2012	ISO 37000:2021	ISO 37001:2016	ISO 37301:2021	ISO 37002:2021	ISO 27001:2013	ISO 22301:2019	ISO/IEC 20000-1:2018	ISO 41001:2018
ELLAKTOR GROUP								☑	☑				
ELLAKTOR S.A.						☑	☑			☑	☑		
CONCESSIONS													
AKTOR CONCESSIONS S.A.	☑	☑	☑				☑			☑	☑		
ATTIKES DIADROMES S.A.	☑	☑	☑	☑	☑						☑		
ATTIKI ODOS S.A.		☑	☑	☑									
MOREAS S.A.	☑		☑	☑									
ALIMOS MARINA DEVELOPMENT S.A.	☑	☑	☑	☑									
ENVIRONMENT													
HELECTOR S.A.*	☑	☑	☑	☑	☑		☑			☑	☑	☑	☑
APOSTIROSI S.A.	☑	☑	☑										
APOTEFROTIRAS S.A.	☑	☑	☑										
ASA RECYCLE (ASPROPYRGOS)	☑	☑	☑	☑	☑						☑		
ASA RECYCLE (LAMIA)	☑	☑	☑										
EDADYM S.A.	☑	☑	☑										
EPALTHEA S.A.	☑	☑	☑										
VEAL S.A.			☑										
REAL ESTATE DEVELOPMENT & SERVICES													
REDS REAL ESTATE DEVELOPMENT S.A.							☑			☑	☑		
GYALOU COMMERCIAL & TOURISM (SMART PARK)	☑		☑										

*\*Where HELECTOR S.A. includes seven (7) projects, and specifically for ISO 50001, two additional projects have been certified.*

*HELECTOR S.A. has been audited for the implementation of the guiding principles of ISO 26000, related to Corporate Social Responsibility (CSR). Additionally, the company has been certified under SA8000:2014 for Social Responsibility Management. APOSTIROSI S.A., a subsidiary of HELECTOR S.A., has been certified under ELOT EN 12740:2000, with a scope covering the sterilization of Hazardous Infectious Healthcare Waste.*

*The Headquarters of the ELLAKTOR Group is located in a building certified under ELOT 1439:2013 – “Organization Friendly to People with Disabilities”. This certification ensures compliance with accessibility standards, including: accessible parking spaces, accessible entrances, accessible pathways (both horizontal and vertical), accessible services and fixed equipment, accessible emergency evacuation routes, personnel training and awareness.*



# Value Chain

Through collaboration with its business partners, the ELLAKTOR Group aims to fully meet its operational needs while ensuring the highest quality in its final projects, products, and services. At the same time, the Group places a strong emphasis on supporting local suppliers, wherever feasible, thereby strengthening local economies. In 2023, 92% of the Group’s total procurement came from domestic suppliers. Domestic suppliers are defined as suppliers headquartered in the country where the Group operates. Significant locations of operation refer to the countries where the Group conducts business, as outlined within the scope of this report.

## PROCUREMENT MANAGEMENT

According to the existing procurement procedures and practices, purchases are carried out per company and/or project, based on specifications, market research, and specific localization requirements of the supplies.

To centralize procurement management, the Group Procurement Department has been established. This department collaborates closely with other Group departments, as well as with the procurement teams of individual companies and projects, ensuring effective monitoring and fulfillment of procurement needs. The Group Procurement Department is responsible for managing purchases that involve multiple companies, joint ventures, or projects within the Group. The goal is to reduce costs by leveraging economies of scale while also monitoring market trends in materials and advising the Group’s companies accordingly.

In 2023, the Group Procurement Department focused on centralized procurement coordination, working closely with other Group departments and procurement teams of individual companies and projects. This collaboration ensured efficient supply chain management, cost optimization, and alignment with the Group’s strategic sourcing objectives.

### Percentage of purchases from local suppliers



## VALUE CHAIN RISK MANAGEMENT

The ELLAKTOR Group continuously monitors, assesses, and reviews the impact of various supply chain-related risks.

In 2023, a reassessment of these risks was conducted, leading to an updated evaluation of their impact levels.

The Group Procurement Department and the procurement teams of individual companies have identified supply chain risks and their potential negative effects, implementing actions to mitigate these risks.

Among the events that could significantly affect the Group’s strategic objectives, operations, reputation, and business continuity, the following supply chain risks were recorded in relation to supply continuity:

- ▶ Disruption in the flow of goods due to unavailability (interrupted continuity).
- ▶ Failure of approved suppliers to fulfill procurement contracts.
- ▶ Lack of framework agreements for some critical goods.

Although market conditions stabilized during 2023, the Group remains proactively prepared to manage similar situations effectively. This is achieved through strengthened planning and forecasting at the business unit level, as well as the ongoing evaluation of business partners.

## DUE DILIGENCE SYSTEMS AND PROCEDURES IN THE VALUE CHAIN

According to existing procurement procedures and practices, purchases are executed per company and/or project, based on specifications, market research, and localization needs. The selection of suppliers and subcontractors follows an open market research process, where product specifications and offers are requested from at least three different suppliers/subcontractors. The selection is based on the best price-quality ratio and delivery response time.

To continuously enhance supply chain management, working groups (project teams) have been established to focus on improving supply chain-related operations.

ELLAKTOR Group has adopted a [Business Partner Code of Conduct](#), outlining the minimum requirements and expectations for third-party collaborations, including those in its value chain. This code is a prerequisite for commercial cooperation and aligns with the United Nations Sustainable Development Goals (SDGs). Under this Code, third parties must adhere to the highest standards of integrity, including:

1. Ethical business practices, such as accurate financial record-keeping, avoidance of undue influence, transparent operations, prevention of conflicts of interest, promotion of fair competition, protection of sensitive information and personal data



2. A safe and healthy work environment
3. Respect for human and labor rights
4. Environmental protection
5. Corporate social responsibility

The Group has acquired an internationally recognized tool to enhance Third-Party Due Diligence across all business segments. This tool assesses business partners based on risk factors, provides continuous monitoring throughout the business relationship, focuses on risks related to anti-bribery and corruption (ABC), cybersecurity, environmental, and social issues and ensures compliance with sanctions and negative reputational risks. Additionally, the Group has integrated ESG (Environmental, Social, and Governance) criteria into supplier contracts, reinforcing its commitment to sustainable and responsible procurement.

More particularly, HELECTOR, through its collaboration with suppliers and subcontractors, aims to fully meet operational needs, ensure the highest quality in its projects, products, and services and support local suppliers and subcontractors wherever possible, contributing to local market growth.

To streamline procurement and financial processes, HELECTOR has implemented a new ERP system (DANAOS-PROJECT VIEW), which facilitates data entry and accurate tracking of financial obligations.

## BUSINESS PARTNERS EVALUATION

The Third-Party Due Diligence Policy ensures the monitoring of integrity risks associated with third parties and evaluates their compliance with laws, regulations, standards, values, ESG goals, and other business principles.

More specifically, before establishing any business relationship with clients, subcontractors, suppliers, agents, consultants, or other business partners, the Group applies integrity due diligence procedures through a dedicated electronic platform. This platform enables: risk-based evaluation of third parties and ongoing monitoring of business partners throughout the duration of the relationship, while it focuses on key risk areas, including anti-bribery and corruption (ABC) compliance, negative media or reputational risks, sanctions screening, cybersecurity threats, environmental and social responsibility issues., etc.

In 2024, the Group further enhanced its evaluation process by acquiring an ESG assessment platform for business partners. This new system strengthens the Group's commitment to sustainability and ensures that its partners align with its ESG principles.

In 2023, there were no reported incidents or concerns regarding integrity violations, environmental non-compliance and human rights violations by any critical business partners of the Group.

## Innovation & Digital Transformation

### INNOVATION

For ELLAKTOR Group, enhancing innovation is an integral part of its strategy, accelerating the transformation of the industries in which it operates. To develop and scale innovative solutions that deliver the desired benefits, the Group works closely across all business segments, focusing on research programs and collaborations applicable to its fields of activity.

In detail, in relation to the Real Estate Development & Management segment, the Group supports the creation of "smart" buildings, designed according to the principles of the circular economy, using innovative materials with advanced properties. Specific initiatives include optimal use of natural resources and raw materials in projects, promotion of reuse and recycling culture and energy-saving initiatives. In the Concessions Segment, the goal is the implementation of "smart" operational models, enabling immediate and effective management of emergency incidents or accidents. In the Environmental Segment, the focus is on efficient waste management, aiming to strengthen the circular economy while promoting energy savings.

To drive these innovations, the Group actively participates in research programs and seeks new collaborations with technology companies and universities to transfer scientific knowledge from research to real-world applications. The key research areas of interest include energy management in buildings and concession projects, climate change adaptation and resilience, strengthening the circular economy and robotic technology applications for emergency incident response in



critical infrastructure and routine maintenance and repair operations.

In 2023, the Group, through international collaborations, submitted proposals for projects focused on developing cost-effective solutions to reduce carbon emissions in buildings, modeling and construction as a service for remote infrastructure, recycling of secondary resources and development of a digital "building passport" using BIM (Building Information Modeling) technologies. Additionally, in 2023, the ELLAKTOR Group submitted 6 proposals for research projects.



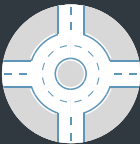
## RESEARCH PROJECTS

The research programs in which the Group’s companies participate aim to discover innovative solutions that will enhance their operations while simultaneously developing new products and services. Below is an overview of these projects.



«Wood2Wood» (W2W) Research Project: Transition to a Circular Economy

In July 2023, the European Commission approved funding for the «Wood2Wood» (W2W) project, in which ELLAKTOR Group participates in collaboration with the Research University Institute of Communication and Computer Systems (ICCS) and other renowned institutions. This project aims to develop a comprehensive framework for the reuse of wood waste, sourced from demolitions and deconstruction from construction activities, discarded old furniture, which constitutes a significant percentage of the annual waste generated across EU countries. Through the application of advanced wood separation and sorting technologies, innovative recycling processes, and digital tools, W2W aspires to reduce demand for virgin raw materials, minimize landfill waste, create high-value secondary products and support the transition to a circular economy.



## CONCESSIONS SEGMENT

The Concessions Sector participates in five (5) research projects through Attikes Diadromes and Moreas. In detail, Attikes Diadromes is involved in four (4) research projects under European research programs, while Moreas participates in one (1) long-term research project in collaboration with the National Technical University of Athens (NTUA).

C-ROADS Research Project – Cooperative Intelligent Transport Systems (C-ITS)	PRECINCT Research Project – Enhancing Cybersecurity in Critical Infrastructure
<p>Since 2019, ATTIKES DIADROMES has been participating in the European research project C-ROADS, which was successfully completed in 2023. This project was part of Investment Priority 3: «Intelligent Transport Services for Road (ITS)» and Specific Objective 10: «Cooperative, Connected, and Automated Mobility – Cooperative ITS and Automation». The C-ROADS project focused on the study, development, and pilot implementation of Cooperative Intelligent Transport Systems (C-ITS) in key sections of the national road network. The initiative aimed at ensuring interoperability with similar pilot tests in other EU member states through the C-ROADS platform, creating a sustainable transportation system, enhancing road safety through optimized infrastructure usage while improving efficiency in both road and freight transport.</p>	<p>Furthermore, since 2021, ATTIKES DIADROMES has been participating in the European research project <b>PRECINCT</b> (Preparedness and Resilience Enforcement for Critical INfrastructure Cascading Cyberphysical Threats and effects with focus on district or regional protection), which was funded under the Horizon 2020 program. The <b>PRECINCT</b> project focuses on the European Union’s critical infrastructure, which faces increasing threats from both cyberattacks and physical hazards. The project aims to strengthen collaboration between private and public entities managing critical infrastructure, enhance protection against cascading cyber-physical threats and improve regional and district-level resilience. The project started on October 1, 2021 and was completed on 2023, with the participation of 40 companies and organizations. In Greece, pilot simulations were conducted for Attiki Odos (AO), Athens International Airport (AIA) – Eleftherios Venizelos and Attiko Metro.</p>



### FRONTIER Research Project – Advanced Traffic Management

ATTIKES DIADROMES participated in the European research project FRONTIER (Next-generation traffic management for empowering CAVs integration, cross-stakeholders collaboration, and proactive multi-modal network optimization), funded under the Horizon 2020 program. The FRONTIER project, involving 18 companies and organizations from across Europe, aimed to develop comprehensive traffic management strategies for the future, addressing key challenges such as integration of automated vehicles into transport networks and minimization of traffic congestion and pollution, reduction of accidents and lowering transportation costs for all users. To achieve these objectives, the project developed autonomous driving and traffic management systems and advanced simulation models to provide optimized traffic solutions. Pilot tests and simulated deployments were conducted in Attiki Odos, Oxford and Antwerp. The FRONTIER project was successfully completed in 2023.

### DELPHI: FeDerated nEtwork of pLatforms for Passenger and freight Intermodality

The DELPHI project focuses on the strategic integration of passenger and freight transport into a unified system, forming a federated network of platforms for multimodal passenger and freight transport. This system is designed to seamlessly and securely share multimodal transport data across different sectors, as well as traffic management system information. Additionally, DELPHI will employ innovative and highly efficient methodologies for traffic monitoring and will integrate various transport modes to facilitate hybrid passenger and freight transport across different ecosystem types. The digital framework and cross-sectoral tools developed within the DELPHI project will be validated through four (4) pilot applications, one of which will take place in Athens, each featuring complementary requirements and characteristics. The project involves 16 companies and institutions, including ATTIKES DIADROMES, Athens Urban Rail Transport Company and ICCS (Institute of Communication and Computer Systems – NTUA). The research project began in July 2023 and has a three-year duration.



### Research Project in Collaboration with the National Technical University of Athens (NTUA)

Since 2012, MOREAS has been participating in the research project titled «Monitoring and Evaluation of the Functional and Structural Condition of the Moreas Motorway Pavements», conducted by members of the research team of the Road Engineering Laboratory of the National Technical University of Athens (NTUA). The objective of the research project is both to support MOREAS in preventive actions and decision-making regarding pavement maintenance management on the motorway and to enhance research on issues related to pavement performance. This project is a continuation of the research initiative «Development of a Monitoring and Evaluation Plan for the Structural and Functional Condition of Pavements», during which a pavement monitoring and evaluation platform for the Moreas Motorway was developed. The annual results report serves as the project's deliverable, including an analysis and evaluation of the data collected through field measurements of the structural and functional characteristics of the pavements each year. For conducting the measurements and field research, the Pavement Monitoring System (PMS) of NTUA's Road Engineering Laboratory is used. This system comprises advanced, high-tech Non-Destructive Testing (NDT) systems, ensuring accurate pavement assessments.





## ENVIRONMENTAL SEGMENT

The Environmental Sector participates in two (2) research projects under the «RESEARCH – CREATE – INNOVATE» action of the Operational Program Competitiveness, Entrepreneurship, and Innovation (EPAnEK).

### UV-LEACH Research Project

The research project titled «Hybrid Model for Landfill Leachate Treatment Combining Advanced Oxidation Processes (AOPs) and Membrane Technology», with the acronym «UV-LEACH», started in 2020 and was completed in 2023 in collaboration with the Aristotle University of Thessaloniki. The treatment of high-pollutant wastewater, such as landfill leachate, is one of today's most significant environmental challenges. The project's objective was to maximize the reduction of organic pollutant loads in treated leachate using innovative pollution control technologies, considering both investment and operational costs, with the ultimate goal of minimizing the environmental footprint of landfill leachate treatment.

### PROMoTE Research Project

The research project titled «Development of an Integrated Methodology for the Removal of Micropollutants in Wastewater and High-Pollutant-Load Leachate by Combining Adsorption, Advanced Oxidation Processes, and Membrane Technology», with the acronym «PROMoTE», started in 2020 in collaboration with the Aristotle University of Thessaloniki and was completed in 2023. The project introduces a new landfill leachate treatment model, utilizing zero-cost raw materials derived from agri-food and other residues, thereby contributing to the circular economy by reintegrating waste and by-products into the life cycle.

## INNOVATIVE SOLUTIONS AND SERVICES

Since November 2020, Attiki Odos subscribers, as well as all electronic users who own transponders, have been able to use their transponders across the entire motorway network in Greece, as part of the GRITS (Greek Interoperable Tolling System) service. This has resulted in an increased penetration of transponder-based payments on all motorways in the country, providing faster transactions at toll stations and reducing delays, thereby improving the overall level of services offered to users. Specifically, on Attiki Odos, nearly 60% of crossings are made using a transponder, while on MOREAS, the percentage reaches 45%.

## DIGITAL TRANSFORMATION

Digital transformation is a key pillar of the ELLAKTOR Group's strategy, aiming to provide user-friendly digital services tailored to the needs of the business. The objective of digital transformation is to enhance productivity by improving the organization's operational processes, increasing the quality and speed of information collection. By leveraging technology, processes become automated and more efficient, allowing employees to focus on more creative and advanced tasks. In 2023, the Group invested €1.6 million in digital transformation initiatives. To achieve this, the Group's IT Department implements flexible models for designing and deploying new digital solutions, integrating innovative methods and cutting-edge technologies across multiple sectors.

Digital transformation includes the following areas:

- ▶ Access to corporate information via mobile devices and tablets
- ▶ Cloud technologies for flexibility, reliability, security, and lower operational costs
- ▶ Data analysis and results presentation 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 develop relevant knowledge and skills at all levels, creating a work environment that is familiar with the digital reality and the opportunities it offers.

The Group's strategy regarding the adoption and implementation of Digital Transformation within its oper-

ations follows a «Cloud First» approach. This means that the IT department prioritizes the use of Cloud technologies for meeting new organizational requirements, avoiding the purchase of hardware and the establishment of costly Data Centers.

Specifically, for business sectors such as the operation of production units—where activity does not have a consistent operational intensity but depends directly on the number of projects and factories at any given time—Cloud technology plays a crucial role in scaling resources up or down as needed. This prevents the allocation of capital that could remain idle for extended periods.

To achieve this, the Group has established a strategic partnership with Microsoft and other leading technology providers, utilizing their services to implement its plans and facilitate the transition to the Cloud.

As of today, the Group has implemented a range of projects leveraging cloud technologies, including electronic mail, user file storage, thematic spaces (SharePoint), secure internet access, and various applications such as the Group Portal and the ProjectView application for managing construction sites and factories, among others.

The Group's digital transformation is an ongoing effort that strongly emphasizes change—not so much in terms of technology itself, but in the way work is conducted. It requires a shift in mindset, encouraging people to adopt new approaches and rethink existing processes and workflows. It is clear that the key element is not the technology itself, but the human factor and how it interacts with new technologies to enhance efficiency, primarily by focusing on meaningful tasks rather than routine and repetitive work.



The following are some indicative examples:

- ▶ The use of Building Information Modeling (BIM) is applied in architecture and construction, enabling significant benefits throughout the entire 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, incorporating information related to its design, construction, maintenance, and operation. This approach can significantly enhance productivity, quality, safety, and overall performance throughout the construction process.
- ▶ The use of cloud computing infrastructure by the Group offers numerous advantages, including:

**Flexibility:** Cloud infrastructure allows users to adjust their computing needs and scale resources accordingly. This enables businesses to quickly adapt to market changes and their evolving requirements.

**Security:** The cloud providers selected by the Group offer secure data storage and processing services, with continuous updates and enhanced security measures, ensuring safe data storage and management

**Accessibility:** Users can access cloud services from anywhere via an internet connection, allowing employees to work remotely and use services from any device connected to the internet.

**Cost-efficiency:** Due to the economies of scale utilized by cloud service providers, these services become more cost-effective.

The adoption of modern cloud technologies, such as IaaS (Infrastructure as a Service), PaaS (Platform as a Service), and SaaS (Software as a Service), provides an economical, secure, and flexible digital resource infrastructure (for data processing and storage). This is particularly beneficial for construction companies, which need to scale resources up or down based on the number of projects and employees at any given time.

- ▶ The operation of an Alternative Data Center in the Cloud, utilizing Microsoft technologies, ensures that in the event of a total failure of the existing Data Center located in the central building, the organization can continue to operate seamlessly within a short period.

- ▶ The use of mobile technology services and the availability of data from anywhere, with enhanced security, provides flexibility and immediacy in work processes and decision-making.
- ▶ Data analysis using advanced techniques for processing raw data offers a reliable and timely overview of project progress, enabling companies to take corrective actions when necessary.
- ▶ The use of advanced SIEM (Security Information and Event Management) event correlation techniques enables the Group to detect potential data breach attempts or employee fraud schemes aimed at data theft, ensuring the protection of its information. SIEM is a security technology that integrates data collection, analysis, and response to security-related incidents within a corporate environment. SIEM continuously collects security data from various network and system sources, as well as user behavior patterns. These data are then analyzed and compared with external threat intelligence sources to detect anomalies, potential threats, and risks. When an issue is identified, SIEM systems trigger alerts or automated response actions, such as notifying security personnel, isolating affected systems, or blocking access from unusual IP addresses. SIEM allows companies to assess their security posture and identify threats in a timely manner.

- ▶ The enhancement of the backup process using cloud technologies, eliminating the need for physical tape storage, and making data backups faster, more cost-effective, and more reliable.
- ▶ Migration to Virtual Machine (VM) technologies to enhance availability, reliability, and security of the infrastructure. The use of virtual machine technology allows for better management of the technological resources required for a service while also being more cost-effective. Additionally, it offers scalability, high availability, and rapid deployment of new machines.
- ▶ Electronic Archiving, Document Management, and Search. The archiving system used by the ELLAKTOR Group consists of a set of processes and technological solutions designed to manage corporate or organizational records. The goal of archiving is to support the company in handling its records while addressing increasing challenges such as regulatory compliance, security, time and cost efficiency, and improved data availability. By utilizing this specialized application, documents are securely transmitted to authorized personnel in a structured manner using metadata (keywords), making searches more efficient and ensuring quick and organized access to information.
- ▶ Employee E-Learning Platform: The IT Department, in collaboration with the Human Resources Department, has developed a dedicated platform for employee training. This platform provides the necessary training for various job roles along with the required documentation.
- ▶ Electronic platform for ESG performance monitor-

ing: A digital platform has been implemented to collect and process performance data of the Group's companies in the field of sustainable development (ESG Monitoring Platform).

- ▶ Use of digital signatures on contractual documents to enhance flexibility and speed in related processes.
- ▶ Cloud-based recruitment management: The onboarding process for new hires is managed via a specialized cloud platform, ensuring efficiency and streamlined operations.

Based on the needs of the Group and its subsidiaries, the implementation of several new projects has begun and is currently in full progress:

- ▶ Development of a new Human Resource Management System (HRMS): The goal is to establish a single point of reference for personnel across the Group while also automating various HR-related processes, such as employee evaluations, leave management, and more.
- ▶ Migration of the traditional telephone system to the cloud: This initiative aims to integrate telephony with the Group's IT systems, enabling seamless access to fixed-line communications from anywhere—whether via desk phones, mobile devices, or computers—using a single, unified phone number.



# 05 Annex

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AA1000 Accountability Principles (2018)

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Greek Sustainability Code - Declaration Of Compliance

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Independent External Assurance Report





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 2023, 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 2023 Sustainable Development Report covers the period from 01.01.2023 to 31.12.2023 and it includes the Group’s companies based in Greece and abroad (Germany, Cyprus and Romania), in which the Group has a majority shareholding and/or exercises management duties. The companies whose data are incorporated into the 2023 Sustainability Report represent 100% of the total turnover of the Group’s ongoing activities (segments of activity: Environment – Concessions – Real Estate Development and Management). The financial results presented refer to the Group’s overall operations, both within and outside of Greece.

Additionally, the data in the [Environment](#) Chapter regarding the joint ventures of the company HELECTOR are consolidatedand do not correspond to the company’s share in these joint ventures.

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 Waste Management sector 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 reasonable external assurance (see [“Independent External Assurance Report”](#)).

For any clarifications regarding the Sustainable Development Report for 2023, please contact:

ESG Strategy & Sustainable Development Division

Tel.: +30 2108185058

E-mail: [sustainability@ellaktor.com](mailto:sustainability@ellaktor.com)

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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 2023 - 31 December 2023.
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. 14-16	
	2-2 Entities included in the organization’s sustainability reporting	p. 16, 18-23 <a href="#">Annual Financial Report 2023</a> (p.291-297)	
	2-3 Reporting period, frequency and contact point	a. Reporting period 01/01/2023 – 31/12/2023 Annual reporting frequency b. Financial Reporting Period 01/01/2023 – 31/12/2023 c. September 2024 d. p. 238	
	2-4 Restatements of information	Any restatements (where they exist) are explained by in-text comments and/or foot-notes. p. 89, 90, 97, 98, 121, 122, 141, 147, 165, 303	
	2-5 External assurance	p. 304-307	
	Activities and workers		
	2-6 Activities, value chain and other business relationships	p. 18-27, 224-226	
	2-7 Employees	p. 137-139	
	2-8 Workers who are not employees	p. 137	



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
GENERAL DISCLOSURES			
GRI 2: General Disclosures 2021	Governance		
	2-9 Governance structure and composition	Five-year term of office of Board members (27.01.2021 – 27.01.2026) p. 192-199	
	2-10 Nomination and selection of the highest governance body	p. 198 <a href="#">Annual Financial Report 2023</a> (p. 162-164)	
	2-11 Chair of the highest governance body	p. 193, 195	
	2-12 Role of the highest governance body in overseeing the management of impacts	p. 34-35, 199-200	
	2-13 Delegation of responsibility for managing impacts	p. 200	
	2-14 Role of the highest governance body in sustainability reporting	p. 34-35, 200	
	2-15 Conflict of interests	p. 204	
	2-16 Communication of critical concerns	α. 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. β. There were no critical concerns that were recorded through the whistleblowing process.	
	2-17 Collective knowledge of the highest governance body	p. 195	
	2-18 Evaluation of the performance of the highest governance body	p. 194-196	
	2-19 Remuneration policies	p. 198, 200 <a href="#">Annual Financial Report 2023</a> (p. 162-164)	
	2-20 Process to determine remuneration	p. 198 <a href="#">Annual Financial Report 2023</a> (p. 162-164)	
	2-21 Annual total compensation ratio	a/c. Ratio of annual total compensation = 60,12 Annual total compensation of the CEO (highest paid employee) * (€1.805.869)/ median of total compensation of all employees** (€30.039) <i>*Total remuneration from ELLAKTOR S.A:</i> <i>**Average gross remuneration of ELLAKTOR S.A. personnel</i> b/c. The ratio of the percentage increase in the annual total remuneration of the CEO to the average percentage increase in the total remuneration of all employees cannot be calculated because the denominator is negative due to a decrease and has been calculated at -0.13%, while the numerator has shown an increase of 780% due to an increase in variable remuneration.	

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. 4-7	
	2-23 Policy commitments	p. 28-31, 78, 149-154, 156, 200-206	
	2-24 Embedding policy commitments	p. 28-31, 53-57, 78-85, 128-129, 149-153, 156-161, 166, 168-172, 188-191, 198-199, 222-226	
	2-25 Processes to remediate negative impacts	p. 28-31, 53-57, 79, 81-87, 88-95, 112-117, 120-123, 124-127, 128-131, 136, 144-146, 149-154, 156-163, 168-173, 188-189, 199, 222-226	
	2-26 Mechanisms for seeking advice and raising concerns	p. 201-205	
	2-27 Compliance with laws and regulations	p. 201-207 Ministerial Decisions imposing fines of €1.0 million for Attiki Odos S.A. and Attikes Diadromes S.A. (paid on 30.10.2023 and 24.10.2023, respectively) were notified on 23.03.2022, without prejudice to the companies' legal rights, against which appeals were filed before the Three-Member Administrative Court of First Instance of Athens on 23.05.2022. The hearing date for these appeals has been set for 11.11.2024 (on the appeal of "Attikes Diadromes S. A.") and 14.11.2024 (on the appeal of "Attiki Odos S. A.")	
	2-28 Membership associations	p. 58, 263-265	
	Stakeholder engagement		
	2-29 Approach to stakeholder engagement	p. 32-33, 260-262	
	2-30 Collective bargaining agreements	p. 152	
MATERIAL TOPICS			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 34-42	
	3-2 List of material topics	p. 34-42	
Energy transition and air emissions management			
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 78-85, 86-93, 96-98, 99-111	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 88-90	
	302-2 Energy consumption outside of the organization	18,950 MWh	
	302-3 Energy intensity	p. 88-90	
	302-4 Reduction of energy consumption	p. 88, 91-92	



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. 96-97	
	305-2 Energy indirect (Scope 2) GHG emissions	p. 96-97	
	305-3 Other indirect (Scope 3) GHG emissions	p. 98	
	305-4 GHG emissions intensity	p. 97	
	305-5 Reduction of GHG emissions	p. 88-92, 96	
	305-6 Emissions of ozone-depleting substances (ODS)	p. 124-127	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	p. 124-127	
Circular economy and waste management			
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 112-118, 298-301	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	p. 112-113, 116-119	
	306-2 Management of significant waste-related impacts	p. 112-113, 116-119	
	306-3 Waste generated	p. 117-118, 298-301	
	306-4 Waste diverted from disposal	p. 112-113, 116-118, 298-301	
	306-5 Waste directed to disposal	p. 112-113, 116-118, 298-301	
Climate change			
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 50, 78-80, 86-87, 88-93, 99-111	
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	p. 50, 78-80, 99-111	

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. 136-137, 142-145, 156-167, 303	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	p. 156-157	
	403-2 Hazard identification, risk assessment, and incident investigation	p. 156-163	
	403-3 Occupational health services	p. 157, 160-161	
	403-4 Worker participation, consultation, and communication on occupational health and safety	p. 156-159	
	403-5 Worker training on occupational health and safety	p. 166-167	
	403-6 Promotion of worker health	p. 143-145	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 136, 156, 158	
	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. 164-165, 303	
	403-10 Work-related ill health	p. 164	



GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
MATERIAL TOPICS			
Equitable and inclusive working environment and human rights			
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 149-155	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	p. 154-155	
	405-2 Ratio of basic salary and remuneration of women to men	<b>Base Salary</b> Total Employees: 0.81 Employees in Managerial Positions: 0.96 Employees in Non-Managerial Positions: 0.88 Employees in Greece: 0.86 Employees Abroad: 1.03 <b>Remuneration</b> Total Employees: 0.79 Employees in Managerial Positions: 0.82 Employees in Non-Managerial Positions: 0.85 Employees in Greece: 0.80 Employees Abroad: 0.58 p. 155	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	p. 154	
GRI 410: Security Practices 2016	410-1 Security personnel trained in human rights policies or procedures	100% of the security personnel working at MOREAS have been trained in Human Rights Policies and Procedures.	
Care for the prosperity of local communities			
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 136, 168-171, 224	
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	a. p. 137 b. Employees who manage a team and hold a position of responsibility c. p. 137, 224 d. p. 224	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	p. 224	

GRI standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
MATERIAL TOPICS			
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	p. 173 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	p. 149 There have been no such incidents.	
Compliance, integrity and business ethics			
GRI 3: Material Topics 2021	3-3 Management of material topics	p. 201-207	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	35 activities (92%) were assessed for risks related to corruption.	
	205-2 Communication and training about anti-corruption policies and procedures	p. 148, 204, 207 All employees with access to the Group's Portal have been informed about the relevant policies and procedures of the Group and have access to the corresponding online course. All the Group's Business Partners, during the conclusion of their contract with the Group, sign a statement confirming that they have been informed about the Regulatory Compliance Program (Code of Ethics, Business Partners' Code, etc.).	
	205-3 Confirmed incidents of corruption and actions taken	p. 204	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 204-205	
GRI 415: Public Policy 2016	415-1 Political contributions	p. 174 In 2023 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 2023 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. 206	



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. 216-223	
Employment practices, training and development			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	p. 140-141	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	p. 143-144	
	401-3 Parental leave	p. 152	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Average Annual Training Hours for managerial employees = 14.95 Average Annual Training Hours for non-managerial employees = 5.93 Average Annual Training Hours for Employees in Greece = 6.90 Average Annual Training Hours For Employees Abroad = 3.66 p. 146-148	
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 145-148	
	404-3 Percentage of employees receiving regular performance and career development reviews	p. 142	
	402-1 Minimum notice periods regarding operational changes	3 weeks	
GRI 402: Labor /Management Relations 2016			
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. 152, 225-226	

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 2023 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	p. 120	
Water and effluents management			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	p. 121-123, 126-127, 302	
	303-2 Management of water discharge-related impacts	p. 123, 126-127	
	303-3 Water withdrawal	p. 121-122, 302	
	303-4 Water discharge	p. 122, 302	
	303-5 Water consumption	p. 122	
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. 225-226 In 2023, 30% (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. 225-226 In 2023, 30% (on the basis of turnover) of business partners were evaluated.	

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. 187, 227-235	
Economic value generation and distribution			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	p. 25	
	201-4 Financial assistance received from government	€25,952,336	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	p. 168-182	
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. 128-131	
	304-3 Habitats protected or restored	p. 128-131	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	p. 129	

## 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 (metric t CO <sub>2</sub> eq.)/m€ = 44.7 Normalization factor: €387,456,885	p. 96-97
C-E2	Scope 2 emissions	Intensity of indirect greenhouse gas emissions (metric t CO <sub>2</sub> eq.)/m€ = 75.5 Normalization factor: €387,456,885	p. 96-97
C-E3	Energy consumption and production	Total energy consumption within the organization: 124,149 MWh Percentage of electricity consumed: 61.59% Percentage of energy consumed from renewables: 2% Total energy production: 222,983 MWh Percentage of energy produced from renewables: 100%	p. 86-87
Social			
C-S1	Stakeholder engagement	-	p. 32-33, 260-262
C-S2	Female employees	-	p. 138, 140
C-S3	Female employees in management positions	25.49% of the employees in the top 10% of highest-paid employees are female	p. 155
C-S4	Employee turnover	-	p. 140-141
C-S5	Employee training	Average training hours (10% of higher paid employees) = 6.22 Average training hours (90% of lower paid workers) = 6.74	-
C-S6	Human rights policy	-	p. 149-152
C-S7	Collective bargaining agreements	-	p. 152
C-S8	Supplier assessment	-	p. 189, 225-226



NON-FINANCIAL ESG METRICS OF ATHEX			
ATHEX Metric	Metric title	Supplementary information	Page of the Report
Core metrics			
Governance			
C-G1	Board composition		p. 192-193
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. 200
C-G3	Materiality		p. 34-42
C-G4	Sustainability policy		p. 28-31, 53
C-G5	Business ethics policy	Code of Ethics, Business Partner Code of Conduct	p. 151, 202-203, 225-226
C-G6	Data security policy	Information Technology Policy	p. 212
Advanced metrics			
Environmental			
A-E1	Scope 3 emissions	GHG intensity of Scope 3 emissions (metric t CO <sub>2</sub> eq.)/m€ =967 Normalization factor: €387,456,885	p. 98
A-E2	Climate change risks and opportunities	-	p. 99-111
A-E3	Waste management	-	p. 112-114, 116-119, 298-301
A-E4	Effluent discharge	-	p. 122
A-E5	Biodiversity sensitive areas	-	p. 128-131
Social			
A-S1	Sustainable economic activity	-	p. 61-73, 266-297
A-S2	Employee training expenditure	-	p. 146
A-S3	Gender pay gap	The gender pay gap for the Group is 18.10% in favor of men.	-
A-S4	CEO pay ratio	Annual total remuneration of the CEO= €1,805,869 CEO pay ratio= 60.12 CEO pay ratio = Annual total compensation of the CEO* (€1,805,869) / Median total compensation for all employees** (€30,039) <a href="#">Remuneration Report 2023</a> (p. 8, 17) <i>*Total remuneration from ELLAKTOR S.A.</i> <i>**Indirect gross remuneration of ELLAKTOR employees</i>	-

NON-FINANCIAL ESG METRICS OF ATHEX			
ATHEX Metric	Metric title	Supplementary information	Page of the Report
Advanced metrics			
Governance			
A-G1	Business model	-	p. 25-27
A-G2	Business ethics violations - P	-	p. 204-205
A-G3	ESG targets	-	p. 53-57
A-G4	Variable pay	Variable pay (%)= 87.32% (€4,768,432/€5,460,350) <a href="#">Remuneration Report 2023</a> (p. 9, 11,13)	-
A-G5	External assurance	-	p. 304-307
Sector-specific metrics			
Environmental			
SS-E4	Water management	-	p. 121-123, 302
SS-E6	Backlog cancellations	For 2023 there were no backlog cancellations.	-
Social			
SS-S6	Health and safety performance	Accident frequency rate= 0.98 Accident frequency rate = (Number of recordable injuries/ Number of hours worked by all employees in calendar year) x 200,000. Accident severity rate= 21.15 Accidents Severity Rate = (Number of workdays lost due to work-related accidents/ Number of hours worked by all employees in calendar year) x 200,000.	p. 165, 303
SS-S8	Customer satisfaction	-	p. 56, 169-170
SS-S9	Customer grievance mechanism	-	p. 205

# 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 10principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
G1 - Board/senior management engagement	1 <sup>st</sup> , 7 <sup>th</sup>	p. 4-7, 200 / GRI 2-12, 2-14, 2-22
G2 - Publicly stated commitment	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 78, 137, 152-153, 204-205 / GRI 2-23
G3 - Code of conduct	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 202-203 / GRI 2-23
G4 - Individual or group responsible on sustainability matters	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 200 / GRI 2-13
G5 - Formal structure to address sustainability matters	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 200 / GRI 2-9, 2-13
G6 - Risk assessment processes	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 208-215 / GRI 205-1
G6.1 - Risk assessment process related to suppliers or other business partners	1 <sup>st</sup> , 3 <sup>rd</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 225-226
G7 - Due diligence on actual and potential negative impacts on sustainability matters	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 34-42 / GRI 2-12, 2-23-a-ii, 3-1, 3-3-d
G7.1 - Due diligence related to suppliers or other business partners	1 <sup>st</sup> , 3 <sup>rd</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 206, 225-226 / GRI 2-23-e, 3-1
G8 - Raising concerns about company conduct	1 <sup>st</sup> , 3 <sup>rd</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 205/ GRI 2-26
G8.1 - Raised concerns about company conduct (additional information)	1 <sup>st</sup> , 3 <sup>rd</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 201-207 / GRI 2-26
G9 - Monitoring the effectiveness of the response to raised concerns regarding the company's behavior	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 205 / GRI 2-25
G10 - Executive pay linked to sustainability performance	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 200 / GRI 2-19
G11 - Board composition	1 <sup>st</sup> , 6 <sup>th</sup>	p. 192-199 / GRI 2-9, 405-1
G12 - Standards considered for the preparation of the Sustainability Report	1 <sup>st</sup> , 7 <sup>th</sup> , 10 <sup>th</sup>	p. 238, 239, 249, 252, 257-259
G13 - External Assurance	10 <sup>th</sup>	p. 304-307 / GRI 2-5

Description	Mapping to the 10principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
HR1 - Material human rights topics	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 38, 42 / GRI 3-2
HR2 - Human Rights Policy commitment	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 149-155, 206-207 / GRI 2-23-c, 2-23-d, 2-23-e
HR2.1 - Human Rights Policy commitment (details)	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 32-33, 260-262 / GRI 3-1-b, 3-3-f
HR3 - Stakeholder engagement in relation to human rights	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 149-152, 206-207/ GRI 2-23, 3-3-d
HR4 - Prevention/mitigation risks associated with human rights	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 147-148, 153-154, 244 / GRI 3-3-d
HR5 - Employee training on issues related to human rights	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 55, 149-155 / GRI 3-3-e
HR6 - Monitoring progress in reducing risks related to human rights	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 55, 149-155 / GRI 3-3-e
HR7 - Contribution to the remediation of impacts related to human rights issues	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 153-154 / GRI 3-3-d-ii
HR8 - Practical actions	1 <sup>st</sup> , 2 <sup>nd</sup>	p. 136 / GRI 3-3-c, 3-3-d
L1 - Labor rights policy commitment	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 136-137, 156-157, 153-155 / GRI 3-3-c, 403
L1.1 - Labor rights policy commitment (additional information)	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 136-137, 156-157, 153-155 / GRI 2-23-c, 2-23-d, 2-23-e
L1.2 - Policy on freedom of association and collective bargaining (Additional information).	3 <sup>rd</sup>	p. 152 / GRI 2-30
L2 - Stakeholder engagement in relation to labor rights	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 260-262 / GRI 3-1-b, 3-3-f, 403
L3 - Measures to mitigate risks related to labor rights	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 158, 166-167, 225 / GRI 3-3-d, 403
L4 - Employee training on issues related to labor rights	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 146-148, 166-167, 153-154 / GRI 3-3-d, 403



Description	Mapping to the 10principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
L5 - Monitoring progress in reducing risks related to labor rights	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 149-151, 154-155, 165, 303 / GRI 3-3-e, 403
L6 - Collective bargaining rights in relation to legislation	3 <sup>rd</sup>	p. 143, 152
L7 - Percentage of women in managerial positions	6 <sup>th</sup>	p. 155
L8 - Ratio of women's to men's remuneration	6 <sup>th</sup>	p. 155, 244/ GRI 405-2
L9 - Injury frequency rate	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 165, 303 / GRI 403-9
L10 - Incident rate percentage	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 165, 303 / GRI 403-9
L11 - Company's contribution to the remediation of impacts related to labor rights issues	3 <sup>n</sup> , 4 <sup>n</sup> , 5 <sup>n</sup> , 6 <sup>n</sup>	p. 146-148, 166-167 / GRI 3-3-d-ii, 403
L12 - Practical actions	3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> , 6 <sup>th</sup>	p. 136 / GRI 3-3-c, 3-3-d, 403
E1 - Policy commitment on environmental issues	7 <sup>th</sup> , 8 <sup>th</sup>	p. 78-79 / GRI 3-3-c, 302, 303, 304, 305, 306
E1.1 - Policy commitment on environmental issues (Additional information)	7 <sup>th</sup> , 8 <sup>th</sup>	p. 78-79 / GRI 2-23-c, 2-23-d, 2-23-e
E2 - Engagement with stakeholders regarding environmental issues	7 <sup>th</sup> , 8 <sup>th</sup>	p. 81-85, 99-111, 128-131/ GRI 3-1-b, 3-3-f, 201-2-a-iv, 302, 303, 304, 305, 306
E3 - Measures to mitigate risks related to environmental issues	7 <sup>th</sup> , 8 <sup>th</sup>	p. 78-85, 91-92, 99-111, 116-117, 123-127, 128-131 / GRI 3-1-b, 3-3-f, 201-2-a-iv, 302, 303, 304, 305, 306
E4 - Monitoring progress in reducing risks related to environmental issues	7 <sup>th</sup> , 8 <sup>th</sup>	p. 54, 80, 85, 99-111, 128-129 / GRI 201-2-a-iv, 302, 303, 304, 305, 306
E4.1 - Goals set for each environmental issue	7 <sup>th</sup> , 8 <sup>th</sup>	p. 54, 80 / GRI 3-3-e, 201-2-a-iv, 302, 303, 304, 305, 306
E4.2 - Monitoring progress of specific goals	7 <sup>th</sup> , 8 <sup>th</sup>	p. 54, 80 / GRI 3-3-e, 201-2-a-iv, 302, 303, 304, 305, 306
E5 - Organization's contribution to the remediation of impacts related to environmental issues	7 <sup>th</sup> , 8 <sup>th</sup>	p. 80-129 / GRI 3-3-d-ii, 201-2-a-iv, 302, 303, 304, 305, 306
E6 - Greenhouse gas emissions (Scope 1, Scope 2)	7 <sup>th</sup> , 8 <sup>th</sup>	p. 96-97 / GRI 305-1, 305-2
E7 - Greenhouse gas emissions (Scope 3)	7 <sup>th</sup> , 8 <sup>th</sup>	p. 98 / GRI 305-3
E7.1 - Scope 3 categories included in the calculation of greenhouse gas emissions (Additional information)	7 <sup>th</sup> , 8 <sup>th</sup>	p. 98 / GRI 305-3

Description	Mapping to the 10principles of the UN Global Compact	Reference to subsections of the Report / GRI Standards
E9 - Actions for climate change adaptation	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 99-111 / GRI 201-2-a-iv
E10 - Percentage of energy consumption from renewable sources	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 88 / GRI 302-1
E12 - Environmental issues identified as material and linked to the organization's operations and/or value chain	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 36-37, 42 / GRI 3-2
E13 - Water withdrawal and consumption	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 121-122, 302 / GRI 303-3, 303-5
E14 - Water intensity of products in areas with high water stress	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 121
E15 - Number and area of owned, leased, or managed facilities within or adjacent to protected areas and/or areas of high biodiversity value	7 <sup>th</sup> , 8 <sup>th</sup>	p. 128-129 / GRI 304-1
E17 - Implementation of projects focused on ecosystem restoration and protection	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 128-131 / GRI 304-3
E18 - Air emissions	7 <sup>th</sup> , 8 <sup>th</sup>	p. 124-126 / GRI 305-7
E19 - Total weight of waste generated	7 <sup>th</sup> , 8 <sup>th</sup>	p. 116-118, 298-301 / GRI 306-3
E20 - Percentage of hazardous waste	7 <sup>th</sup> , 8 <sup>th</sup>	p. 112-113, 116-118, 298-301 / GRI 306-4, 306-5
E22 - Practical actions implemented or planned	7 <sup>th</sup> , 8 <sup>th</sup> , 9 <sup>th</sup>	p. 80 / GRI 3-3-c, 3-3-d, 302, 303, 304, 305, 306
AC1 - Anti-corruption compliance program	10 <sup>th</sup>	p. 202-207 / GRI 3-3-c, 205
AC1.1 - Year of the most recent revision of the compliance program	10 <sup>th</sup>	2022
AC2 - Organization's policies related to conflict of interest	10 <sup>th</sup>	p. 204
AC3 - Training on anti-corruption and integrity	10 <sup>th</sup>	p. 104, 146-148/ GRI 205-2
AC3.1 - Frequency of training sessions	10 <sup>th</sup>	On an annual basis
AC4 - Monitoring of the anti-corruption compliance program	10 <sup>th</sup>	p. 202-204 / GRI 3-3-e
AC5 - Total number and nature of corruption incidents	10 <sup>th</sup>	p. 204 / GRI 205-3
AC6 - Measures for resolving suspected corruption incidents	10 <sup>th</sup>	p. 204-207 / GRI 3-3-d, 205
AC7 - Organization's collective action against corruption	10 <sup>th</sup>	p. 202 / GRI 3-3-d, 205
AC8 - Practical actions	10 <sup>th</sup>	p. 189, 201-207 / 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 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	Page of the Report	Additional information
ENVIRONMENT			
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) 13,682 metric t CO <sub>2</sub> eq.
IF-WM-110a.2	(1) Total landfill gas generated, (2) percentage flared, (3) percentage used for energy	-	(1) 1,876,280 MMBtu (2) 0.03% (3) 99.97%
Fleet fuel management			
IF-WM-110b.1	(1) Fleet fuel consumed, (2) percentage natural gas, (3) percentage renewable	-	(1) 26,483 MWh (2) 31 % (3) 3.5 %
Air quality			
IF-WM-120a.1	Air emissions of the following pollutants: (1) NOx (excluding N <sub>2</sub> O), (2) SOx, (3) volatile organic compounds (VOCs), and (4) hazardous air pollutants (HAPs)	-	(1) 39.98 (2) 0.10 (3) 2.85
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
HUMAN CAPITAL			
Workforce health and safety			
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	-	(1α) 2.38 (1β) 1.27 (2α) 0 (2β) 0 (3α) 0
IF-WM-320a.3	Number of road accidents and incidents	-	1
Labor practices			
IF-WM-310a.1	Percentage of active workforce covered under collective bargaining agreements	-	76%
IF-WM-310a.2	(1) Number of work stoppages and (2) total days idle	-	No incidents of business interruption were recorded.

SASB code	Description	Page of the Report	Additional information
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. 112-113, 118-119, 298-301	-
IF-WM-420a.3	Amount of material (1) recycled, (2) composted, and (3) processed as waste-to-energy	p. 112-113, 118-119, 298-301	-
IF-WM-420a.4	Amount of electronic waste collected, percentage recovered through recycling	-	92 tonnes of waste electrical and electronic equipment (100%). The Group's activity does not include the collection of electronic equipment waste.

## AA1000 Accountability Principles (2018)

Principle	Methods	Reference to the Report
Inclusivity	Identification of key stakeholders and discussion to understand key topics of interest	p. 32-33 ,260-262
Materiality	Identifying and prioritizing topics that are important to the organization and its stakeholders	p. 34-42
Responsiveness	Responding to material topics and ensuring transparency on performance	p. 50, 53-57, 78-118, 136, 143-148, 149-155, 156-167, 168-173, 201-207, 224-226, 298-301, 303
Impact	Presentation of direct and indirect impacts of the organization's activities	p. 34-42, 50, 53-57, 78-118, 136, 143-148, 149-155, 156-167, 168-173, 201-207, 224-226, 298-301, 303



# 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. 28-31, 53-57
2. Materiality	p. 34-42
3. Objectives	p.53-57
4. Management of Value Chain	p. 224-226
PROCESS MANAGEMENT	
5. Responsibility	p.34-35, 199-200
6. Rules & Processes	p. 78-85, 136, 156-163, 201-206, 222-223
7. Recording & Monitoring	p. 43-52, 53-57, 78-87, 88-90, 96-98, 112-113, 115-116, 116-122, 125, 128-129, 135, 138-141, 146-148, 155, 165, 166-167, 168-169, 182-183, 187-189, 194-196, 224-226, 227-235, 303
8. Incentive and reward policies for Sustainable Development	p. 43-52, 53-57, 78-87, 88-90, 96-98, 112-113, 115-116, 116-122, 125, 128-129, 135, 138-141, 146-148, 155, 165, 166-167, 168-169, 182-183, 187-189, 194-196, 200, 224-226
9. Stakeholder Engagement	p.32-33, 260-262
10. Product Responsibility and Innovation	p. 227-232
ENVIRONMENT	
11. Usage of Natural Resources	p. 88-95, 112-119, 120-123, 124-127, 128-131
12. Resource Management	p. 80, 81-85, 120
13. Greenhouse Gas Emissions & Climate Change	p. 80, 86-111
SOCIETY	
14. Employment Rights	p. 136, 260-262
15. Equal Opportunities	p. 149-155
16. Employment	p. 136-145
17. Human Rights in the supply chain	p. 149-152, 225-226
18. Empowerment of Local Communities	p. 168-183
19. Participation in Initiatives & Political Influence	p. 58, 245, 263-265
20. Prevention & Combating of Corruption	p. 56-57, 201-206, 222-223




# 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. p. 53-57, 80, 136, 168, 189, 238
4.3	Transparency	
4.4	Ethical behavior	
4.5	Respect for stakeholder interests	p.192-193, 201-207, 222-223
4.6	Compliance with legislation	p. 201-205
4.7	Respect for international norms of behavior	p. 43-52, 149-152, 201-207
4.8	Respect for human rights	p. 149-155




Report tables

COMMUNICATION WITH STAKEHOLDERS

Stakeholders	Communication	Basic needs and expectations	Main response of ELLAKTOR Group
 Employees	<ul style="list-style-type: none"><li>Information via the Group Portal and Internal Announcements.</li><li>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.</li><li>Implementation of an open-door policy</li></ul>	<ul style="list-style-type: none"><li>Working in a healthy and safe environment.</li><li>Competitive remuneration.</li><li>Equal development opportunities.</li><li>Equal, meritocratic and inclusive working environment.</li><li>Information on the Group's activities and their development.</li></ul>	<ul style="list-style-type: none"><li>Human resources.</li><li>Attracting and retaining employees.</li><li>Training and development of Employees.</li><li>Occupational Health and Safety.</li><li>Diversity, Equity &amp; Inclusion.</li></ul>
 Clients	<ul style="list-style-type: none"><li>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.</li><li>Through Athens Exchange, the official website and social media of the Group, the media and face-to-face meetings.</li><li>Continuous communication with the relevant executives of each. project/activity area on issues related to clients' projects.</li></ul>	<ul style="list-style-type: none"><li>Constructive cooperation with the Group.</li><li>Completion of quality works and services in accordance with approved specifications within the agreed timescales.</li></ul>	<ul style="list-style-type: none"><li>Policies.</li><li>Business continuity.</li><li>Regulatory Compliance System.</li><li>Quality Management System.</li></ul>
 Investment Community (shareholders, investors and ESG performance rating agencies)	<ul style="list-style-type: none"><li>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.</li><li>Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community.</li><li>Ongoing communication with the Group's Management, the Financial Division, the Investor Relations Division and the ESG Strategy &amp; Sustainable Development Division.</li></ul>	<ul style="list-style-type: none"><li>Information on the Group's business developments and its growth path.</li><li>Update on the Group's ESG performance.</li><li>Safeguarding the Group's sustainability and applying strict standards and principles of corporate governance.</li></ul>	<ul style="list-style-type: none"><li>Materiality Assessment.</li><li>Participation in rating agencies.</li><li>Contributing to the creation of Sustainable Cities &amp; Communities.</li></ul>

Stakeholders	Communication	Basic needs and expectations	Main response of ELLAKTOR Group
 Financial Institutions	<ul style="list-style-type: none"><li>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.</li><li>Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the institutions.</li><li>Ongoing communication with the Group's Management, the Financial Division, the Investor Relations Division and the ESG Strategy &amp; Sustainable Development Division.</li></ul>	<ul style="list-style-type: none"><li>Timely information on the Group's financial results and business developments.</li><li>Safeguarding the sustainability of the Group.</li><li>Application of strict standards and principles of corporate governance.</li><li>Integration of ESG criteria in the Group's activities.</li></ul>	<ul style="list-style-type: none"><li>Corporate Governance Code and Rules of Operation.</li><li>Policies.</li><li>Regulatory Compliance System.</li><li>Business Continuity.</li></ul>
 Local Community (Local government, local civil society organizations, local media)	<ul style="list-style-type: none"><li>Information through press releases on business developments, Annual Sustainable Development Reports and face-to-face meetings/consultations with representatives of local stakeholders.</li><li>Constant communication with the Group's competent executives, the persons in charge of each project/activity segment.</li></ul>	<ul style="list-style-type: none"><li>Development of the region in which the Group operates.</li><li>Providing employment opportunities.</li><li>Working with suppliers from local communities.</li><li>Protection of the environment in the areas of operation.</li><li>Social support.</li></ul>	<ul style="list-style-type: none"><li>Economic Value Generation and Distribution.</li><li>Contributing to the creation of Sustainable Cities &amp; Communities.</li><li>Annual Social Responsibility Action Plan.</li><li>Improvement of the Urban and Built Environment.</li><li>Environmental Management System and implementation of procedures in projects.</li></ul>
 Business Partners	<ul style="list-style-type: none"><li>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.</li><li>Through Athens Exchange, the official website and social media of the Group, the media, and by face-to-face meetings.</li><li>Constant communication with the site managers and the procurement managers of each project/activity.</li></ul>	<ul style="list-style-type: none"><li>Consistent, profitable and long-term cooperation with the Group in all its business segments.</li><li>Safe working environment.</li></ul>	<ul style="list-style-type: none"><li>Sustainable Development Strategy and Key Priorities.</li><li>Business Continuity.</li><li>Business Partner Code of Conduct.</li><li>Provision of training programs.</li></ul>



Stakeholders	Communication	Basic needs and expectations	Main response of ELLAKTOR Group
 <b>Business Community</b>	<ul style="list-style-type: none"><li>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.</li><li>Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community.</li><li>Constant communication with representatives of the Management and competent Group executives (project/activity managers) on issues concerning joint ventures.</li></ul>	<ul style="list-style-type: none"><li>Timely, consistent and transparent information on the Group's developments.</li></ul>	<ul style="list-style-type: none"><li>Sustainable Development Strategy and Key Priorities.</li><li>Issuing annual reports.</li></ul>
 <b>Government bodies and regulatory authorities</b>	<ul style="list-style-type: none"><li>Information through stock exchange announcements, press releases on business developments, financial results presentations, Annual Financial Report, Annual Sustainable Development Reports, data and information disclosures.</li><li>Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community.</li><li>Ongoing communication with representatives of the Management and relevant Group executives (project/activity area managers) on operational issues, ESG actions and labor rights.</li></ul>	<ul style="list-style-type: none"><li>Responsible and lawful activity of the Group.</li><li>Protection of the environment.</li><li>Implementation of social actions.</li><li>Respect and protect human rights.</li><li>Protecting the health and safety of employees.</li><li>Implement strict standards and principles of corporate governance.</li></ul>	<ul style="list-style-type: none"><li>Sustainable Development Strategy and Key Priorities.</li><li>Human rights policy.</li><li>Environmental Management System.</li><li>Annual Social Responsibility Action Plan.</li></ul>
 <b>Greater society</b> (Media, Sustainable Development bodies, NGOs, civil society bodies)	<ul style="list-style-type: none"><li>Information through stock exchange announcements, press releases on business developments, financial results presentations, Annual Financial Report, Annual Sustainable Development Reports, data and information disclosures.</li><li>Through Athens Exchange, the Group's official website and social media, the media and face-to-face meetings with representatives of the investment community.</li><li>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.</li><li>Meetings with the ESG Strategy &amp; Sustainable Development Division, regarding NGOs and civil society bodies as needed.</li></ul>	<ul style="list-style-type: none"><li>Information on the Group's sustainable development activities.</li><li>Information on the Group's financial, environmental and social results, business developments and activities.</li></ul>	<ul style="list-style-type: none"><li>Sustainable Development Strategy and Key Priorities.</li><li>Materiality Assessment.</li><li>Performance in rating agencies.</li><li>Issuing annual reports.</li></ul>

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.



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 United Nations Global Compact promotes the adoption of 10 universally accepted principles in the fields of human rights, labor conditions, environmental protection, and anti-corruption on an international level. The company ATTIKI ODOS has been a signatory to the Global Compact since 2008. In 2019, the ELLAKTOR Group committed to adhering to the principles of the Global Compact in its business activities and interactions with stakeholders. As a subsidiary of the ELLAKTOR Group, ATTIKI ODOS is represented by the Group in the international organization and is now a member of the local network (Global Compact Network Greece).



SEV Business Council for Sustainable Development

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.



### United Nations Global Compact Network Greece

The Greek Network for the United Nations Global Compact promotes the Global Compact initiative in Greece. It operates as an independent, self-governed entity that collaborates closely with the UN Global Compact in New York and serves as its point of contact for all members at the national level. The ELLAKTOR Group is one of the founding members of the Greek Network of the United Nations Global Compact. Since 2019, ATTIKI ODOS has also been a member.



### 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-American Chamber of Commerce

The Hellenic-American Chamber of Commerce is a non-profit, self-sustaining organization founded in 1932, with the aim of promoting economic and business relations between the United States and Greece.

With approximately 1,000 members, the Chamber continues to strengthen and facilitate trade, investments, and professional partnerships between the two countries. It is an accredited member of the American Chamber of Commerce in Washington and a member of the European Council of American Chambers of Commerce, making it one of the most active organizations in Europe.

The ELLAKTOR Group is a member of the Hellenic-American Chamber of Commerce.

Additionally, HELECTOR participates in the Hellenic Association of Renewable Energy Electricity Producers (HAREP\_HELECTOR), the Hellenic Biogas Producers Association (HBA) through its unit in Mavrorachi, the Hellenic Solid Waste Management Association (HSWMA), the European Geothermal Energy Council (EGEC), the American-Hellenic Chamber of Commerce (AmCham), and the Hellenic-German Chamber of Commerce and Industry.

Specifically, HELECTOR’s subsidiaries, APOSTIROSI S.A. and APOTEFROTIRAS S.A., are registered with the «Association of Healthcare Waste Management Enterprises» (SEDUA), which focuses on entities in the healthcare sector for the implementation of legislation regarding the management of healthcare facility waste.

Additionally, «Attiki Odos S.A.» and «Attikes Diadromes S.A.» are members of the Association of S.A. Companies & Ltd. (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 Programme Centre from May 2019 to May 2022.

Finally, «Attikes Diadromes S.A.» is a member of important international organizations, such as the TRB (Transportation Research Board of the National Academies) in the USA and ERTICO-ITS Europe. It also collaborates with Greek entities, including the Road Safety Institute «Panos Mylonas,» the Hellenic Institute of Transportation Engineers (HITE), the Research University Institute of Communication and Computer Systems (EPISEY), ITS Hellas, among others. Additionally, it participates in the Hellenic Institute of Customer Service (HICS), where the Director of Toll Operations, Commercial Management, and Customer Service of «Attikes Diadromes S.A.» serves as Chair.



EU TAXONOMY TABLES

The following table provides a summary by business segment of ELLAKTOR Group (see note 5 of the Annual Consolidated Financial Statements), showing the Key Performance Indicators (KPIs) for aligned, eligible non-aligned, and non-eligible activities (in € million and as a percentage):

Amounts in € million	Absolute Turnover 2023	Turnover Ratio 2023	Absolute Operating Expenditure 2023	Operating Expenditure Ratio 2023	Absolute Capital Expenditure 2023	Capital Expenditure Ratio 2023
Segment	€ million	%	€ million	%	€ million	%
CONTINUING OPERATIONS						
A. TAXONOMY-ELIGIBLE ACTIVITIES						
A.1 Environmentally sustainable activities (taxonomy-aligned)						
CONCESSIONS	8.89	2.3%	0.02	0.2%	0.88	9.6%
ENVIRONMENT	26.82	6.9%	0.70	7.8%	0.61	6.6%
OTHER	0.93	0.2%	0.04	0.5%	0.00	0.0%
Total eligible and aligned activities	36.63	9.5%	0.77	8.6%	1.50	16.2%
A.2 Taxonomy-eligible activities non-environmentally sustainable (non-aligned activities)						
CONCESSIONS	264.09	68.2%	6.85	76.7%	2.41	26.0%
ENVIRONMENT	13.15	3.4%	0.08	0.9%	0.11	1.2%
REAL ESTATE & DEVELOPMENT SERVICES	10.36	2.7%	0.02	0.2%	0.13	1.4%
Total eligible and non-aligned activities	287.59	74.2%	6.95	77.8%	2.65	28.7%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A)	324.22	83.7%	7.72	86.4%	4.14	44.9%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES						
TOTAL NON-ELIGIBLE ACTIVITIES (B)	63.23	16.3%	1.22	13.6%	5.09	55.1%
TOTAL (A+B) - CONTINUING OPERATIONS	387.46	100.0%	8.93	100.0%	9.23	100.0%

Amounts in € million	Absolute Turnover 2023	Turnover Ratio 2023	Absolute Operating Expenditure 2023	Operating Expenditure Ratio 2023	Absolute Capital Expenditure 2023	Capital Expenditure Ratio 2023
Segment	€ million	%	€ million	%	€ million	%
DISCONTINUED OPERATIONS						
A. TAXONOMY-ELIGIBLE ACTIVITIES						
A.1 Environmentally sustainable activities (taxonomy-aligned)						
CONSTRUCTION	17.89	4.3%	0.02	0.7%	0.00	0.0%
A.2 Taxonomy-eligible activities non-environmentally sustainable (non-aligned activities)						
CONSTRUCTION	342.93	81.5%	2.18	63.3%	2.67	83.8%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A)	360.83	85.7%	2.21	64.0%	2.67	83.8%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES						
CONSTRUCTION	60.18	14.3%	1.24	36.0%	0.52	16.2%
TOTAL (A+B) - DISCONTINUED OPERATIONS	421.01	100%	3.45	100.0%	3.18	100.0%
TOTAL ACTIVITIES: CONTINUING & DISCONTINUED OPERATIONS						
A.1 Total eligible and aligned activities - Total activities	54.53	6.7%	0.79	6.4%	1.50	12.0%
A.2 Total eligible and non-aligned activities - Total activities	630.52	78.0%	9.14	73.8%	5.31	42.8%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A) - TOTAL ACTIVITIES	685.05	84.7%	9.92	80.1%	6.81	54.8%
TOTAL NON-ELIGIBLE ACTIVITIES (B) - TOTAL ACTIVITIES	123.42	15.3%	2.46	19.9%	5.61	45.2%
TOTAL (A+B) - TOTAL ACTIVITIES	808.46	100.0%	12.38	100.0%	12.42	100.0%

The following tables provide detailed information regarding the disclosures of the three KPIs: Revenue, Operating Expenditures, and Capital Expenditures.

Turnover

	2023		
	Code (2)	Turnover (3)	% Turnover (4)
Amounts in € million			
Segment / Economic Activities (1)	€ million		%
A. TAXONOMY-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS			
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Continuing operations			
CONCESSIONS			
Infrastructure enabling low carbon water transport	CCA 6.16	8.89	2.3%
ENVIRONMENT			
Hazardous waste treatment	PPC 2.2	4.25	1.1%
Sorting and material recovery from non-hazardous waste	CE 2.7	2.44	0.6%
Electricity generation from wind power	CCM 4.3	1.50	0.4%
Composting of organic waste	CCM 5.8	0.00	0.0%
Landfill gas capture and utilization	CCM 5.10	18.64	4.8%
Other categories			
OTHER			
Electricity generation using solar photovoltaic technology	CCM 4.1	0.93	0.2%
TURNOVER OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED) (A.1) - CONTINUING OPERATIONS		36.63	9.5%
Of which enabling activities		0.00	0.0%
Of which transitional activities		0.00	0.0%

\*Y= Yes, activity is taxonomy-eligible and aligned with the taxonomy for the relevant environmental objective  
N= No, activity is taxonomy-eligible but not aligned with the taxonomy for the relevant environmental objective

\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria (“Does Not Significantly Harm”)									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% turnover aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS															
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Continuing operations															
N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	-	Y	Y	Y	Y	Y	2.1%	-	
CONCESSIONS															
N/EL	N/EL	N/EL	Y	N	N/EL	Y	Y	Y	-	Y	Y	Y	-	-	
N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y	-	Y	Y	-	-	
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	0.4%	-	
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	-	-	
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	5.7%	-	
													1.5%		
ENVIRONMENT															
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	-	-	
5.4%	2.3%	0.0%	1.1%	0.6%	0.0%		Y	Y	Y	Y	Y	Y	9.7%		
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
0.0%															



Turnover	2023		
	Code (2)	Turnover (3)	% Turnover (4)
Amounts in € million			
Segment / Economic Activities (1)	€ million		%
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)-Continuing operations			
REAL ESTATE DEVELOPMENT & SERVICES			
Acquisition and ownership of buildings	CCM 7.7	10.36	2.7%
CONCESSIONS			
Infrastructure enabling low-carbon road transport and public transport	CCA 6.15	264.09	68.2%
ENVIRONMENT			
Collection and transport of hazardous waste	PPC 2.1	9.36	2.42%
Sorting and material recovery from nonhazardous waste	CE 2.7	3.77	0.97%
Composting of bio-waste	CCM 5.8	0.01	0.0%
Other categories			
TURNOVER OF TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT TAXONOMY-ALIGNED ACTIVITIES) (A.2)- CONTINUING OPERATIONS		287.59	74.2%
A. Turnover of taxonomy-eligible activities (A.1+A.2) - Continuing operations		324.22	83.7%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS			
Turnover of taxonomy-non-eligible activities – Continuing operations		63.23	16.3%
TOTAL (A+B) - CONTINUING OPERATIONS		387.46	100.0%

\*Y= Yes, activity is taxonomy-eligible and aligned with the taxonomy for the relevant environmental objective  
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\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria (“Does Not Significantly Harm”)									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% turnover aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	%	E	T
EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
N/EL	EL	N/EL	N/EL	N/EL	N/EL								64.3%		
N/EL	N/EL	N/EL	EL	N/EL	N/EL								-		
N/EL	N/EL	N/EL	N/EL	EL	N/EL								-		
EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.7%		
2.7%	68.2%	0.0%	2.4%	1.0%	0.0%								64.9%		
8.1%	70.5%	0.0%	3.5%	1.6%	0.0%								74.6%		

Turnover	2023		
	Code (2)	Turnover (3)	% Turnover (4)
Amounts in € million			
Segment / Economic Activities (1)	€ million		%
A. TAXONOMY-ELIGIBLE ACTIVITIES – DISCONTINUED OPERATIONS			
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Discontinued operations			
CONSTRUCTION - Discontinued operations			
Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event	CCM 1.2	0.00	0.0%
Electricity generation using solar photovoltaic technology	CCM 4.1	3.05	0.7%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	14.84	3.5%
Other categories			
RENEWABLE ENERGY SOURCES - Discontinued activities			
TURNOVER OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY) (A.1) - DISCONTINUED OPERATIONS	17.89	4.3%	
Of which enabling activities	17.89	4.2%	
Of which transitional activities	0.00	0.0%	

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N= No, activity is taxonomy-eligible but not aligned with the taxonomy for the relevant environmental objective

\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria (“Does Not Significantly Harm”)									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% turnover aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES – DISCONTINUED OPERATIONS															
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Discontinued operations															
CONSTRUCTION - Discontinued operations															
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	-	-	
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	1.7%	E	
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	0.5%	E	
													26.2%		
													15.5%		
4.3%	0.0%	0.0%	0.0%	0.0%	0.0%		Y	Y	Y	Y	Y	Y	43.9%		
4.2%	0.0%	0.0%	0.0%	0.0%									E		
0.0%															



Turnover																								
2023										Substantial contribution criteria						DNSH criteria (“Does Not Significantly Harm”)								
										Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% turnover aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category- Enabling activity
Amounts in € million				Code (2)	Turnover (3)	% Turnover (4)																		
Segment / Economic Activities (1)				€ million		%	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	Y,N*	%	E	T			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not-Taxonomy-aligned activities) – Discontinued operations																								
CONSTRUCTION – Discontinued operations																								
Conservation forestry	CCM 1.4	4.83	1.1%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1%	
Electricity generation using solar photovoltaic technology	CCM 4.1	0.07	0.0%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								-	
Electricity generation from hydropower	CCM 4.5	1.63	0.4%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.5%	
Transmission and distribution of electricity	CCM 4.9	0.72	0.2%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								-	
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	7.84	1.9%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.6%	
Construction, extension and operation of wastewater collection and treatment	CCM 5.3	20.85	5.0%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.0%	
Infrastructure for rail transport	CCM 6.14	106.24	25.2%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								-	
Infrastructure enabling low-carbon road transport and public transport	CCA 6.15	170.81	40.6%							N/EL	EL	N/EL	N/EL	N/EL	N/EL								20.7%	
Infrastructure enabling low carbon water transport	CCA 6.16	8.62	2.0%							N/EL	EL	N/EL	N/EL	N/EL	N/EL								0.1%	
Construction of new buildings	CCM 7.1	11.15	2.6%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.1%	
Renovation of existing buildings	CCM 7.2	2.36	0.6%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.3%	
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.02	0.0%							EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.0%	
Maintenance of roads and highways	CE 3.4	6.93	1.6%							N/EL	N/EL	N/EL	N/EL	EL	N/EL								1.2%	
Emergency services	CCA 14.1	0.05	0.0%							N/EL	EL	N/EL	N/EL	N/EL	N/EL								-	
Flood risk prevention and anti-flood protection infrastructure	CCA 14.2	0.83	0.2%							N/EL	EL	N/EL	N/EL	N/EL	N/EL								-	
TURNOVER OF TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT TAXONOMY-ALIGNED ACTIVITIES) (A.2)- DISCONTINUED OPERATIONS		342.93	81.5%							37.0%	42.8%	0.0%	0.0%	1.6%	0.0%								24.4%	
A. Turnover of taxonomy-eligible activities (A.1 + A.2) - Discontinued operations		360.83	85.7%							41.2%	42.8%	0.0%	0.0%	1.6%	0.0%								68.3%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES - DISCONTINUED OPERATIONS																								
Turnover of taxonomy-non-eligible activities – Discontinued operations		60.18	14.3%																					
TOTAL (A + B) - DISCONTINUED OPERATIONS		421.01	100.0%																					

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EL= Activity is taxonomy-eligible for the relevant objective

Turnover	2023		
	Code (2)	Turnover (3)	% Turnover (4)
Amounts in € million			
Segment / Economic Activities (1)		€ million	%
A.1 Total eligible and aligned activities – Total activities		54.53	6.7%
A.2 Total eligible and non-aligned activities-Total activities		630.52	78.0%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A) - TOTAL ACTIVITIES		685.05	84.7%
TOTAL NON-ELIGIBLE ACTIVITIES (B) TOTAL ACTIVITIES		123.42	15.3%
TOTAL (A+B) - TOTAL ACTIVITIES		808.46	100.0%

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EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% turnover aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T
4.8%	1.1%	0.0%	0.5%	0.3%	0.0%								29.9%		
20.5%	55.0%	0.0%	1.2%	1.3%	0.0%								40.8%		
25.4%	56.1%	0.0%	1.7%	1.6%	0.0%								70.7%		

	CONTINUING OPERATIONS		DISCONTINUED OPERATIONS		TOTAL OPERATIONS	
	% Turnover/Total Turnover		% Turnover/Total Turnover		% operating expenditure/Total operating expenditure	
	Taxonomy-aligned per objective	Taxonomy-eligible objective	Taxonomy-aligned per objective	Taxonomy-eligible objective	Taxonomy-aligned per objective	Taxonomy-eligible objective
CCM - Climate change mitigation	5.44%	8.11%	4.25%	41.23%	4.82%	25.36%
CCA - Climate change adaptation	2.29%	70.45%	0.00%	42.83%	1.10%	56.07%
WTR - Water and marine resources	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
CE - Circular economy	0.63%	1.60%	0.00%	1.65%	0.30%	1.63%
PPC- Pollution prevention and control	1.10%	3.51%	0.00%	0.00%	0.53%	1.68%
BIO - Biodiversity and ecosystems	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%



Operating Expenditure

	2023		
	Code (2)	Operating expenditure (3)	% Operating expenditure (4)
Amounts in € million			
Segment / Economic Activities (1)		€ million	%
A. TAXONOMY-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS			
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Continuing operations			
CONCESSIONS			
Infrastructure enabling low carbon water transport	CCA 6.16	0.02	0.2%
ENVIRONMENT			
Hazardous waste treatment	PPC 2.2	0.07	0.8%
Sorting and material recovery from nonhazardous waste	CE 2.7	0.02	0.3%
Electricity generation from wind power	CCM 4.3	0.27	3.0%
Landfill gas capture and utilization	CCM 5.10	0.34	3.8%
Other categories			
OTHER			
Electricity generation using solar photovoltaic technology	CCM 4.1	0.04	0.5%
OPERATING EXPENDITURE OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED) (A.1) - CONTINUING OPERATIONS		0.77	8.6%
Of which enabling activities		0.00	0.0%
Of which transitional activities		0.00	0.0%

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EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Operating expenditure aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T
N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	-	Y	Y	Y	Y	Y	0.5%		
N/EL	N/EL	N/EL	Y	N	N/EL	N	N	N	-	N	N	N	-	-	
N/EL	N/EL	N/EL	N/EL	Y	N/EL	N	N	N	N	-	N	N	-	-	
Y	N	N/EL	N/EL	N/EL	N/EL	-	N	N	N	N	N	N	5.0%	-	
Y	N	N/EL	N/EL	N/EL	N/EL	-	N	N	N	N	N	N	7.5%	-	
													1.4%		
Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	-		
7.3%	0.2%	0.0%	0.8%	0.3%	0.0%		Y	Y	Y	Y	Y	Y	14.4%		
0.0%	0.0%	0.0%	0.0%	0.0%	0.0%										
0.0%															

Operating Expenditure

Operating Expenditure																				
Amounts in € million	2023			Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)										
	Code (2)	Operating expenditure (3)	% Operating expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Operating expenditure aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity	
	Segment / Economic Activities (1)	€ million	%	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T	
A.2 Taxonomy-eligible but not environmentally sustainable activities (not-Taxonomy-aligned activities)- Continuing operations																				
REAL ESTATE DEVELOPMENT & SERVICES																				
Acquisition and ownership of buildings	CCM 7.7	0.02	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-			
CONCESSIONS																				
Infrastructure enabling low-carbon road transport and public transport	CCA 6.15	6.85	76.7%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								52.0%			
ENVIRONMENT																				
Collection and transport of hazardous waste	PPC 2.1	0.03	0.3%	N/EL	N/EL	N/EL	EL	N/EL	N/EL											
Sorting and material recovery from non-hazardous waste	CE 2.7	0.06	0.6%	N/EL	N/EL	N/EL	N/EL	EL	N/EL								-			
Composting of bio-waste	CCM 5.8	0.00	0.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-			
Other categories																	0.7%			
OPERATING EXPENDITURE OF TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT-TAXONOMY ALIGNED ACTIVITIES) (A.2)- CONTINUING OPERATIONS		6.95	77.8%							0.2%	76.7%	0.0%	0.3%	0.6%	0.0%					
A. Operating expenditure of Taxonomy-eligible activities (A.1+ A.2) - Continuing operations		7.72	86.4%							7.5%	76.9%	0.0%	1.0%	0.9%	0.0%					
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS																				
Operating expenditure of taxonomy-non-eligible activities – Continuing operations		1.22	13.6%																	
TOTAL (A+B) - CONTINUING OPERATIONS		8.93	100.0%																	

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EL= Activity is taxonomy-eligible for the relevant objective



Operating Expenditure

Operating Expenditure																							
Amounts in € million	2023			Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)													
	Code (2)	Operating expenditure (3)	% Operating expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Operating expenditure aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity				
	Segment / Economic Activities (1)	€ million	%	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T				
A. ENVIRONMENTALLY SUSTAINABLE ACTIVITIES – DISCONTINUED OPERATIONS																							
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Discontinued operations																							
CONSTRUCTION – Discontinued operations																							
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	0.02	0.7%	Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y		E					
Other categories																	4.2%	-					
RENEWABLE ENERGY SOURCES - Discontinued activities																	76.0%						
OPERATING EXPENDITURE OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED) (A.1) - DISCONTINUED OPERATIONS		0.02	0,.7%							0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	Y		Y	Y	Y	80.2%		
Of which enabling activities		0.02	0.7%							0.7%	0.0%	0.0%	0.0%	0.0%	0.0%	Y		Y	Y	Y		E	
Of which transitional activities		0.00	0.0%							0.0%													

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\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective

Operating Expenditure

Operating Expenditure																					
Amounts in € million	2023			Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)											
	Code (2)	Operating expenditure (3)	% Operating expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Operating expenditure aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity		
	Segment / Economic Activities (1)	€ million	%	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not-Taxonomy-aligned activities)- Discontinued operations																					
CONSTRUCTION-Discontinued operations																					
Forestry conservation	CCM 1.4	0.01	0.3%																		
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0.06	1.6%																		
Construction, extension and operation of wastewater collection and treatment	CCM 5.3	0.15	4.3%																		
Infrastructure for rail transport	CCM 6.14	1.08	31.3%																		
Infrastructure enabling low-carbon road transport and public transport	CCA 6.15	0.72	20.8%														1.9%				
Infrastructure enabling low-carbon water transport	CCA 6.16	0.02	0.7%														0.1%				
Construction of new buildings	CCM 7.1	0.10	2.8%																		
Maintenance of roads and highways	CE 3.4	0.05	1.4%																		
Other categories																	0.3%				
OPERATING EXPENDITURE OF TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT-TAXONOMY ALIGNED ACTIVITIES) (A.2)- DISCONTINUED OPERATIONS		2.18	63.3%							40.4%	21.4%	0.0%	0.0%	1.4%	0.0%					2.2%	
A. Operating expenditure of Taxonomy-eligible activities (A.1+ A.2) - Discontinued operations		2.21	64.0%							41.1%	21.4%	0.0%	0.0%	1.4%	0.0%					82.4%	
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES- DISCONTINUED OPERATIONS																					
Operating expenditure of taxonomy-non-eligible activities – Discontinued operations		1.24	36.0%																		
TOTAL (A+ B) - DISCONTINUED OPERATIONS		3.45	100.0%																		

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EL= Activity is taxonomy-eligible for the relevant objective



Operating Expenditure

Amounts in € million	2023		
	Code (2)	Operating expenditure (3)	% Operating expenditure (4)
Segment / Economic Activities (1)		€ million	%
A.1 Total eligible and aligned activities - Total activities		0.79	6.4%
A.2 Total eligible and non-aligned activities - Total activities		9.14	73.7%
TOTAL ELIGIBLE ACTIVITIES (A.1 + A.2) (A) - TOTAL ACTIVITIES		9.92	80.1%
TOTAL NON-ELIGIBLE ACTIVITIES (B) - TOTAL ACTIVITIES		2.46	19.9%
TOTAL (A+B) - TOTAL ACTIVITIES		12.38	100%

\*Y= Yes, activity is taxonomy-eligible and aligned with the taxonomy for the relevant environmental objective  
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\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria ("Does not significantly harm criteria")									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Operating expenditure aligned with (A.1) or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T
5.5%	0.2%	0.0%	0.5%	0.2%	0.0%								63.1%		
11.4%	61.3%	0.0%	0.2%	0.8%	0.2%								15.4%		
16.9%	61.5%	0.0%	0.8%	1.0%	0.2%								78.5%		

	CONTINUING OPERATIONS		DISCONTINUED OPERATIONS		TOTAL OPERATIONS	
	% operating expenditure/Total operating expenditure		% operating expenditure/Total operating expenditure		% operating expenditure/Total operating expenditure	
	Taxonomy-aligned per objective	Taxonomy-eligible objective	Taxonomy-aligned per objective	Taxonomy-eligible objective	Taxonomy-aligned per objective	Taxonomy-eligible objective
CCM - Climate change mitigation	7.30%	7.51%	0.67%	41.09%	5.46%	16.86%
CCA - Climate change adaptation	0.25%	76.94%	0.00%	21.45%	0.18%	61.49%
WTR - Water and marine resources	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
CE - Circular economy	0.26%	0.89%	0.00%	1.42%	0.19%	1.04%
PPC- Pollution prevention and control	0.76%	1.04%	0.00%	0.00%	0.55%	0.75%
BIO - Biodiversity and ecosystems	0.00%	0.00%	0.00%	0.00%	0.00%	0.21%

Capital expenditure

Amounts in € million	2023			Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)							
	Code (2)	Capital expenditure (3)	% Capital expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Capital expenditure in aligned with (A.1 or eligible with (A.2), year 2022 (18)
	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%
Segment / Economic Activities (1)		€ million	%														
A. TAXONOMY-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS																	
A.1 Environmentally sustainable activities (Taxonomy-aligned) – Continuing operations																	
CONCESSIONS																	
Infrastructure enabling low carbon water transport	CCA 6.16	0.88	9.6%	N/EL	Y	N/EL	N/EL	N/EL	N/EL	Y	-	Y	Y	Y	Y	Y	10.7%
ENVIRONMENT																	
Hazardous waste treatment	PPC 2.2	0.08	0.9%	N/EL	N/EL	N/EL	Y	N	N/EL	Y	Y	Y	-	Y	Y	Y	-
Sorting and material recovery from non-hazardous waste	CE 2.7	0.01	0.2%	N/EL	N/EL	N/EL	N/EL	Y	N/EL	Y	Y	Y	Y	-	Y	Y	-
Landfill gas capture and utilization	CCM 5.10	0.52	5.6%	Y	N	N/EL	N/EL	N/EL	N/EL	-	Y	Y	Y	Y	Y	Y	23.0%
Other categories																	5.2%
CAPITAL EXPENDITURE OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY-ALIGNED) (A.1) – CONTINUING OPERATIONS		1.50	16.2%	5.6%	9.6%	0.0%	0.9%	0.2%	0.0%		Y	Y	Y	Y	Y	Y	38.9%
Of which enabling activities		0.00	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								E
Of which transitional activities		0.00	0.0%	0.0%													

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\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective



Capital expenditure

Capital expenditure																			
Amounts in € million	2023			Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)									
	Code (2)	Capital expenditure (3)	% Capital expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Capital expenditure in aligned with (A.1 or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
		€ million	%	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T
A.2 Taxonomy-eligible but not environmentally sustainable activities (not-Taxonomy-aligned activities)- Continuing operations																			
REAL ESTATE DEVELOPMENT & SERVICES																			
Acquisition and ownership of buildings	CCM 7.7	0.13	1.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
CONCESSIONS																			
Infrastructure enabling low-carbon road transport and public transport	CCA 6.15	2.41	26.0%	N/EL	EL	N/EL	N/EL	N/EL	N/EL								31.9%		
ENVIRONMENT																			
Collection and transport of hazardous waste	PPC 2.1	0.00	0.04%	N/EL	N/EL	N/EL	EL	N/EL	N/EL								-		
Sorting and material recovery from non-hazardous waste	CE 2.7	0.11	1.15%	N/EL	N/EL	N/EL	N/EL	EL	N/EL										
Other categories																			
CAPITAL EXPENDITURE OF TAXONOMY-ELIGIBLE BUT NOTENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT-TAXONOMY ALIGNED ACTIVITIES) (A.2)- CONTINUING OPERATIONS		2.65	28.7%							1.4%	26.0%	0.0%	0.0%	1.2%	0.0%				
A. Capital expenditure of Taxonomy-eligible activities (A.1+A.2) - Continuing operations		4.14	44.9%							7.0%	35.6%	0.0%	0.9%	1.4%	0.0%				
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES – CONTINUING OPERATIONS																			
Capital expenditure of taxonomy-non-eligible activities - Continuing operations		5.09	55.1%																
TOTAL (A + B) – CONTINUING OPERATIONS		9.23	100.0%																

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EL= Activity is taxonomy-eligible for the relevant objective

Capital expenditure

Capital expenditure			2023								Substantial contribution criteria			DNSH criteria (“Does not significantly harm criteria”)														
Amounts in € million			Code (2)	Capital expenditure (3)	% Capital expenditure (4)							Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Capital expenditure in aligned with (A.1 or eligible with (A.2), year 2022 (18)	Category- Enabling activity	Category- Transitional activity	
Segment / Economic Activities (1)				€ million	%							Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES– DISCONTINUED OPERATIONS																												
A.1 Environmentally sustainable activities (Taxonomy-aligned)- Discontinued operations																												
CONSTRUCTION – Discontinued operations																												
91.7%																												
RENEWABLE ENERGY SOURCES- Discontinued operations																												
4.8%																												
CAPITAL EXPENDITURE OF ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (TAXONOMY) (A.1) – DISCONTINUED OPERATIONS				0.00	0.0%							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%							96.5%				
Of which enabling activities				0.00	0.0%							0.0%	0.0%	0.0%	0.0%	0.0%	0.0%								E			
Of which transitional activities				0.00	0.0%							0.0%																

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N= No, activity is taxonomy-eligible but not aligned with the taxonomy for the relevant environmental objective

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EL= Activity is taxonomy-eligible for the relevant objective



Capital expenditure

Capital expenditure																									
Amounts in € million	2023			Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)															
	Code (2)	Capital expenditure (3)	% Capital expenditure (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Capital expenditure in aligned with (A.1 or eligible with (A.2), year 2022 (18)	Category- Enabling activity	Category- Transitional activity						
				Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T						
Segment / Economic Activities (1)				€ million			%																		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not-Taxonomy-aligned activities)- Discontinued operations																									
CONSTRUCTION – Discontinued operations																									
Construction, extension and operation of water collection, treatment and supply systems	CCM 5.1	0.09	2.8%	EL	N/EL	N/EL	N/EL	N/EL	N/EL																
Construction, extension and operation of wastewater collection and treatment	CCM 5.3	0.01	0.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL																
Infrastructure for rail transport	CCM 6.14	1.72	54.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL																
Infrastructure enabling low-carbon road transport and public transport	CCA 6.15	0.68	21.4%	N/EL	EL	N/EL	N/EL	N/EL	N/EL																
Infrastructure enabling low carbon water transport	CCA 6.16	0.00	0.1%	N/EL	EL	N/EL	N/EL	N/EL	N/EL																
Construction of new buildings	CCM 7.1	0.15	4.8%	EL	N/EL	N/EL	N/EL	N/EL	N/EL																
Maintenance of roads and highways	CE 3.4	0.01	0.2%	N/EL	N/EL	N/EL	N/EL	EL	N/EL																
CAPITAL EXPENDITURE OF TAXONOMY-ELIGIBLE BUT NOT ENVIRONMENTALLY SUSTAINABLE ACTIVITIES (NOT-TAXONOMY ALIGNED ACTIVITIES) (A.2)- DISCONTINUED OPERATIONS		2.67	83.8%	62.1%	21.5%	0.0%	0.0%	0.2%	0.0%									0.0%							
A. Capital expenditure of taxonomy-eligible activities (A.1+A.2) - Discontinued operations		2.67	83.8%	62.1%	21.5%	0.0%	0.0%	0.2%	0.0%									96.5%							
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES – DISCONTINUED OPERATIONS																									
Capital expenditure of taxonomy-non-eligible activities - Discontinued operations		0.52	16.2%																						
TOTAL (A+B) - DISCONTINUED OPERATIONS		3.18	100.0%																						

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EL= Activity is taxonomy-eligible for the relevant objective

Capital expenditure

	2023		
	Code (2)	Capital expenditure (3)	% Capital expenditure (4)
Amounts in € million			
Segment / Economic Activities (1)		€ million	%
A.1 Total eligible and aligned activities - Total activities		1.50	12.0%
A.2 Total eligible and non-aligned activities - Total activities		5.31	42.8%
TOTAL TAXONOMY-ELIGIBLE ACTIVITIES (A.1 + A.2) (A) – TOTAL ACTIVITIES		6.81	54.8%
TOTAL TAXONOMY-NON-ELIGIBLE ACTIVITIES (B) – TOTAL ACTIVITIES		5.61	45.2%
TOTAL (A+B) – TOTAL ACTIVITIES		12.42	100.0%

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\*\*N/EL= Activity is not taxonomy-eligible for the relevant environmental objective  
EL= Activity is taxonomy-eligible for the relevant objective

Substantial contribution criteria						DNSH criteria (“Does not significantly harm criteria”)									
Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)	% Capital expenditure in aligned with (A.1 or eligible with (A.2), year 2022 (18)	Category-Enabling activity	Category-Transitional activity
Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,* N/EL**	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	Y,N,*	%	E	T
4.2%	7.1%	0.0%	0.6%	0.1%	0.0%								73.9%		
17.0%	24.9%	0.0%	0.0%	0.9%	0.0%								15.9%		
21.1%	32.0%	0.0%	0.7%	1.0%	0.0%								89.8%		

	CONTINUING OPERATIONS		DISCONTINUED OPERATIONS		TOTAL OPERATIONS	
	% of capital expenditure/Total capital expenditure		% of capital expenditure/Total capital expenditure		% of capital expenditure/Total capital expenditure	
	Taxonomy-aligned per objective	Taxonomy-eligible per objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM - Climate change mitigation	5.61%	7.02%	0.00%	62.05%	4.17%	21.13%
CCA - Climate change adaptation	9.58%	35.62%	0.00%	21.54%	7.12%	32.01%
WTR - Water and marine resources	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
CE - Circular economy	0.16%	1.38%	0.00%	0.20%	0.12%	1.03%
PPC- Pollution prevention and control	0.85%	0.85%	0.00%	0.00%	0.63%	0.66%
BIO - Biodiversity and ecosystems	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%



TABLE OF GROUP’S NON-HAZARDOUS WASTE

2023	Management Methods			
Type of waste	Total quantity (kg)	Recovery (R) * (kg)	Disposal (D)** (kg)	Temporary on-site storage (kg)
Paper, mixed paper, cardboard	130,175	130,175		
Metal scrap	57,926	54,900		3,026
Glass	347	347		
Plastics and plastic packaging	14,768	14,768		
Tyres	880	880		
Cables	2,265	2,265		
WEEE (Waste from electrical and electronic equipment)	8,638	8,638		
Demolitions	579,250	579,250		
Excavations	94,932,140	94,932,140		
Mixed packaging	6,630	6,630		
Wooden packaging	3,140	3,140		
Mixed non-hazardous waste	83,330	83,330		
Municipal waste	116,667	29,524	87,143	
Other non-hazardous waste***	2,318	785	1,533	
Total	95,938,474	95,846,772	88,676	3,026

\* **Reuse (on-site):** 12,840kg, **Recycling (on-site):** 95,745,568kg, **Composting (on-site):** 2,034kg, **Other recovery method:** 86,330 kg  
\*\* **Incineration:** 1,533 kg, **Incineration with energy recovery:** 7,488 kg, **Landfill:** 79,655 kg, **Temporary on-site storage:** 3,026kg  
\*\*\* **Indicatively:** animal by-products

TABLE OF GROUP’S HAZARDOUS WASTE

2023	Management Methods			
Type of waste	Total quantity (kg)	Recovery (R) (kg) *	Disposal (D)(kg)**	Temporary on-site storage (kg)
Used mineral oils	77,723	75,223		2,500
Lead accumulators	12,800	12,150		650
WEEE *(Waste from electrical and electronic equipment)	5,597	5,597		
Fluorescent lamps	1,309	1,309		
Batteries	372	372		
Contaminated packages	100			100
Toner	79	79		
Contaminated Absorbent materials	3,212	3,112		100
Oil filters	4,882	4,757		125
Laboratory chemicals	20	20		
Waste fuel	400	400		
Other hazardous waste **	6,675,502	3,635,502		3,040,000
Total	6,781,996	3,738,521		3,043,475

\***Recycling:** 3,738,521 kg  
\*\* **Insulating bricks**

TABLE OF NON-HAZARDOUS WASTE MANAGED BY THE GROUP’S COMPANIES AND SUBCONTRACTORS

2023	Management Methods			
Type of waste	Total quantity (kg)	Recovery (R) (kg)*	Disposal (D)(kg)**	Temporary on-site storage (kg)
Paper, mixed paper, cardboard	29,620	29,620		
Metal scrap	55,910	55,910		
Plastics and plastic packaging, pallet tanks	1,420	1,420		
Cables	450	450		
WEEE (Waste from electrical andelectronic equipment)	1,403	1,403		
Demolitions	7,289,470	7,289,470		
Excavations	11,641,687	11,641,687		
Wooden packaging	680	680		
Mixed non-hazardous waste	225,070	225,070		
Municipal waste	2,372		2,372	
Other non-hazardous waste ***	5,644	5,644		
Total	19,253,726	19,251,354	2,372	

\* **Reuse (off site):** 19,094,054 kg , **Other recovery method:** 157,300 kg  
\*\* **Landfill:** 2,372 kg  
\*\*\* **Indicatively:** Bulky waste, used cooking oils

TABLE OF HAZARDOUS WASTE MANAGED BY THE GROUP’S COMPANIES AND SUBCONTRACTORS

2023	Management Methods			
Type of waste	Total quantity (kg)	Recovery (R) (kg) *	Disposal (D)(kg)	Temporary on-site storage (kg)
Used mineral oils	27,529	27,529		
WEEE *(Waste from electrical andelectronic equipment)	113	113		
Fluorescent lamps	33	33		
Batteries	12	12		
Contaminated packages	2,720	2,720		
Contaminated absorbent materials	1,829	1,829		
Oil filters	394	394		
Other hazardous waste**	59,160	59,160		
Total	91,790	91,790		

\***Recycling:** 31,020kg, **Other recovery method:** 60,770 kg  
\*\*Oil-containing waste, bilge water



WATER WITHDRAWAL

Water withdrawal per source	Fresh water with quality ≤1,000 mg/L TDS (m³)	Water with quality >1,000 mg/L TDS (m³)
Groundwater	701,111	65,309
Third-party water (Public or private water supply networks)	223,122	
Wastewater from on-site sources	26,953	134,173
Rainwater	5,510	
Other sources (Water Treatment Plants, Desalination Plants)	14,600	28,266
Total	971,296	227,748

WATER DISCHARGES

Water discharges	Quantity of freshwater discharges with quality ≤1,000 mg/L TDS (m³)	Quantity of water discharges with quality >1,000 mg/L TDS (m³)
Into surface waters	0	0
Into groundwater	0	0
Into the sea	0	0
Water discharge to third parties (e.g., public and private entities)	15,069	137,196
Total	15,069	137,196

HEALTH AND SAFETY PERFORMANCE

Health and Safety Performance Indexes	WORK-RELATED INJURIES (GRI 403-9)								
	2021			2022			2023		
	Male	Female	Total	Male	Female	Total	Male	Female	Total
EMPLOYEES									
Number of fatalities as a result of work-related injury	0	0	0	0	0	0	0	0	0
Rate of fatalities as a result of work-related injury	0	0	0	0	0	0	0	0	0
Number of high-consequence work-related injuries	0	0	0	0	0	0	0	0	0
Rate of high-consequence work-related injuries	0	0	0	0	0	0	0	0	0
Number of recordable injuries	14	3	17	14	7	21	18	4	22
Rate of recordable injuries	3.46	1.16	2.56	3.92	2.24	3.53	6.16	2.55	4.90
Lost days due to injury (calendar days)	273	16	289	372	94	466	449	26	475
Total number of hours worked	4,051,098	2,597,141	6,648,239	4,189,242	2,785,972	6,975,214	2,919,728	1,570,937	4,490,665
WORKERS WHO ARE NOT EMPLOYEES									
Number of fatalities as a result of work-related injury				0	0	0	0	0	0
Rate of fatalities as a result of work-related injury				0	0	0	0	0	0
Number of high-consequence work-related injuries				0	0	0	1	0	1
Rate of high-consequence work-related injuries				0	0	0	0.27	0	0.18
Number of recordable injuries				1	0	1	3	0	3
Rate of recordable injuries				1.59	0	1.05	4.01	0	2.76
Lost days due to injury (calendar days)				10	0	10	21	0	21
Total number of hours worked				630,781	325,472	956,253	748,813	339,077	1,087,890

**Note:**  
-The indicator represents the number of accidents per 1 million work hours.  
-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).  
-The KPIs for accidents in 2021 and 2022 have been adjusted and include continuing operations for comparison purposes.  
-Accidents do not include fatalities, incidents due to pathological causes, accidents with zero days of absence from work, and traffic accidents occurring during commutes 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 S.A.** company (hereinafter referred to as **ELLAKTOR**) has assigned **TÜV HELLAS (TÜV NORD) SA** (hereinafter referred to as **TÜV HELLAS**) the reasonable external assurance of the Sustainable Development Report, which covers the period of 1/1/2023-31/12/2023.

**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, 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 2023 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 the total of the numerical indicators (except financial statement data indicators) that ELLAKTOR reported at the Sustainability Report Chapters, based on the **GRI Topic Standards**, the **ESG Reporting Guide 2022 of Athens Stock Exchange**, the **10 Principles of the UN Global Compact**, the **Sustainability Accounting Standards Board (SASB)** guidelines for the Waste Management and **Entity specific indicators** (hereafter Total Reporting Indicators).

**Γ.** The control of the adherence to the AA1000 AccountAbility Principles (Inclusivity, Materiality, Responsiveness & Impact) against the criteria found in **AA1000AP (2018)**.

The reasonable external assurance as it is defined by the above project scope,

refers to the Sustainability Report of **ELLAKTOR** for 2023 and it was conducted based on the corresponding correlation table of 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. ESG 2022 Reporting Guide of Athens Stock Exchange (ATHEX)**
- D. 10 Principles of the UN Global Compact**
- E. Sustainability Accounting Standards Board (SASB) – (Waste Management)**
- F. Entity specific indicators**
- G. 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 total reporting indicators, 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 sustainability 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 Total Reporting Indicators, in connection with the findings

of the above steps. In addition, the methodologies, and practices for extracting the results were reviewed and crosschecks were performed on the reliability and quality of the indicators reported in the report. These checks consist of (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** companies in Greece, Germany, 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 & Sustainable Development 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 2023 has been prepared “In Accordance” with the GRI Universal Standards 2021.**

- In our opinion, and based on the review conducted, the Report has been prepared “In Accordance” with the **GRI Sustainability Reporting Standards (GRI Universal Standards 2021)** as reflected in the Table of Contents of the Report.

**B. Control of accuracy of the claims mentioned for the Total Reporting Indicators that ELLAKTOR reported at the Sustainability Report Chapters, based on the GRI Topic Standards, the ESG 2022 Reporting Guide of the ATHEX, the 10 Principles of the UN Global Compact, the Sustainability Accounting Standards Board (SASB) guidelines for the Waste Management and Entity specific indicators.**

- In our opinion, and based on the overview conducted, the Total Reporting Indicators of the Sustainable Development Report, provides an accurate and reasonable depiction of the sustainable development performance of **ELLAKTOR**.

**C. 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**

- In our opinion, and based on the overview that preceded it, **ELLAKTOR** applies the Principle of Inclusivity when developing its approach to sustainable development.

**Materiality: Focus on the material issues related to sustainability**

- In our opinion, and based on the overview that preceded it, **ELLAKTOR** provides a comprehensive and balanced approach in defining the material issues of sustainable development.

**Responsiveness: Addressing the needs and expectations of stakeholders**

- In our opinion, and based on the previous overview, **ELLAKTOR** has responded in a timely and appropriate manner, through decisions and actions, to the needs and expectations of its stakeholders in matters of sustainable development.

**Impact: Impact of company’s activities to the broader ecosystems**

- In our opinion, and based on the review that preceded it, **ELLAKTOR** has understood and managed the direct and indirect effects on the wider ecosystems arising from the material issues of sustainable development.

In our opinion, and based on the review that was conducted, the claims made provide a true and reasonable picture regarding the coverage of the requirements of the Accountability Principles, as they are set in AA1000AP (2018). Also, a true and reasonable picture was established regarding the reliability and quality of



the performance indicators that were reviewed and which are 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, September 26, 2024  
For **TÜV HELLAS (TÜV NORD)**

**Nestor Paparoupas**  
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