

ENVIRONMENTAL & ENERGY POLICY

Group's ESG Strategy and Sustainable Development Division

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Introduction

ELLAKTOR Group, recognizing its responsibility towards the environment, has set as its goal and priority the effective environmental management and the reduction of any burden resulting from its business activities, applying best available practices and techniques, developing strategies for the continuous improvement of its environmental performance and focusing on the continuous information and awareness of its stakeholders on environmental issues and energy.

Protecting the environment, preventing pollution, promoting the circular economy, achieving zero greenhouse gas emissions, tackling the risks of climate change, preserving biodiversity and protecting ecosystems are key priorities of the Group in all its activities, in order not only to mitigate its environmental impact, but also to increase its positive impact on the environment.

Purpose and Basic Principles

The Group's Environmental & Energy Policy aims to describe not only the minimum commitments to comply with the environmental legislation that is the basis for environmental protection, but also the additional commitments of the Group's Management for an integrated environmental management system with climate change and circular economy as its main strategic pillars in all its activities.

This policy embraces the principles of the UN Global Compact, the 17 UN Global Sustainable Development Goals (SDGs), the objectives of the EU Green Deal, complies with the requirements of international standards such as ISO 14001, ISO 50001 and European regulations, such as EMAS III, and meets the relevant needs and expectations of its stakeholders.

In cases where national legislation and international environmental protection standards differ, the Group undertakes to apply the strictest standard.

Scope

This Policy applies to all Group companies, including those based abroad, and is binding on (i) the members of the Board of Directors (BoD), (ii) the persons exercising managerial duties in the Group's companies, (iii) the rest of the Group's employees and is also binding on all business partners of the Group and its companies.

When a company of the Group participates in a joint-venture scheme that is not controlled by the Group and/or in subsidiaries with a participation rate (direct and indirect) of less than 100%, the partners are informed about this Policy and are encouraged to apply its principles and adopt corresponding policies if they do not already have.

The Group's subsidiaries may adopt individual environmental & energy policies, which will be aligned with and comply with this Group's Policy.

Definitions

- The "Company" means the company "ELLAKTOR SA".
- "Group" means the group of holdings of the company "ELLAKTOR SA", i.e., the Company and the companies controlled by it ("subsidiaries").
- "Policy" means Environmental & Energy Policy.

Policy Development

The Group's Management, having placed the protection of the environment at the core of its strategy, is committed to:

- Uninterrupted compliance with the current legislation in force, and with any other requirements related to environmental protection and energy efficiency, use and consumption.
- Protect the environment including pollution prevention.
- Ensuring the provision of the required information and resources to achieve the objectives of the implemented Environmental & Energy Management Systems.
- The continuous improvement of Environmental and Energy Management Systems and in general of environmental and energy performance, contributing to Sustainable Development and the mitigation of worsening climatic conditions.
- Consultation and open dialogue with stakeholders on environmental and energy issues.

In particular, the Group is committed to the following, for which it develops action plans and incorporates relevant objectives into its strategy:

- implementation, operation and continuous improvement of Energy and Environmental Management Systems certified according to ISO 50001 and ISO 14001
- implementation of an internal audit program on projects by certified internal auditors
- application of best available techniques for environmental protection
- unified energy management aiming at the rational use and saving of energy through actions and control of energy consumption.
- reducing greenhouse gas and other air emissions
- minimisation of hazardous and non-hazardous waste, through the reduction of waste produced, reuse to the maximum extent, recycling and the adoption of waste sorting practices at source, contributing to the promotion of the circular economy and industrial symbiosis
- rational water management and implementation of 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
- conservation and protection of 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, traffic, public utility networks, protected areas
- protection of antiquities and monuments of our 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 environmental and energy issues, including employees of subcontractors
- 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 case 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 trainings of its employees
- working with suppliers to achieve its environmental goals

Strategic pillars

- **Climate Change Mitigation**

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

- **Circular Economy**

ELLAKTOR Group has placed the circular economy at the core of its strategy, among other sustainable practices, as the transition to the circular model is a prerequisite for entering a path of sustainable development and prosperity. By adopting the circular economy model, the Group aims to preserve products and materials as much as possible, through extending their lifespan and increasing recycling and reuse rates, increasing their added value. The transition to the circular economy makes it imperative to promote and implement modern and innovative waste management methods, with the aim of maximizing their utilization.

Employee obligations

The environmental responsibility of all employees is a basic prerequisite for the successful implementation of this Policy. All employees at every hierarchical level must:

- Adhere to the Group's Environmental & Energy Policy.
- Strictly adhere to the 18 Basic Environmental and Energy Rules of the Group.
- Apply waste sorting at source and dispose in the appropriate container.
- Adopt energy-saving practices and behavior.
- Manage water and raw materials wisely.
- Protect and preserve biodiversity.
- Intervene and inform in case they detect anything that is contrary to the rules and principles of this Policy.
- Participate in training seminars on environmental and energy issues organized by the Group and its subsidiaries.

Employees in positions of responsibility where their decision-making may affect the environmental performance of the Group, have additional responsibilities and responsibilities which are described in detail in the internal procedures of the Environmental and Energy Management Systems of the subsidiaries.

Business Partners

The acceptance and compliance of all the Group's business partners, such as suppliers, partners and subcontractors, with the principles and requirements of this Policy, is their contractual obligation.

Report Violations

ELLAKTOR Group has developed a specific [Whistleblowing Policy](#), which can be used by the Group's employees, suppliers, partners, and subcontractors, as well as the local community, in good faith, to report any violations of the Environmental & Energy Policy.

In cases where non-compliance with the principles of this policy is detected, the Group undertakes to take immediate corrective actions and withdraw any consequences due to non-compliance.

Training

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

At the same time, the Group uses tools to inform and raise awareness among employees on environmental and energy protection issues, such as awareness campaigns and the transmission of systematic environmental & energy flashes, with the aim of developing an environmentally responsible corporate culture.

Monitoring and evaluation

The implementation of the Environmental & Energy Policy is monitored by the ESG Strategy & Sustainable Development Division, under the supervision of the Sustainable Development Committee and the Group's Board of Directors.

The ESG Strategy & Sustainable Development Division was established at Group level and is supervised by the Sustainable Development Committee, with the primary objective and responsibility, among other things, the design and implementation of a sustainable development strategy, social contribution and environmental – energy management for all its companies. Its main responsibilities are also the supervision and support of the activities of the Group's companies, in collaboration with Environmental & Energy Managers of its subsidiaries, on issues related to sustainable development and social contribution, as well as environmental and energy management issues.

The Group uses the due diligence process as a means of identifying, evaluating and preventing situations that could place at risk the compliance with this Policy.

The Group evaluates and monitors compliance with the Environmental & Energy Policy in its activities, as well as its effectiveness, through the process of internal environmental audits and the annual review by the Management of each subsidiary, in order to identify situations that may place at risk the compliance with this Policy.

On an annual basis, the Group monitors environmental and energy indicators on its environmental performance with the aim of its continuous improvement and is committed to publishing them through the annual Sustainable Development Report.

Approval and Review of the Policy

Under the responsibility of the ESG Strategy & Sustainable Development Division, the Environmental & Energy Policy is communicated to all employees and is posted updated on the Group's internal intranet.

The Group's Environmental & Energy Policy is approved by the Group's CEO, reviewed on an annual basis and revised whenever necessary. The Group's ESG Strategy & Sustainable Development Division is responsible for the preparation and recommendation of the Policy revisions.