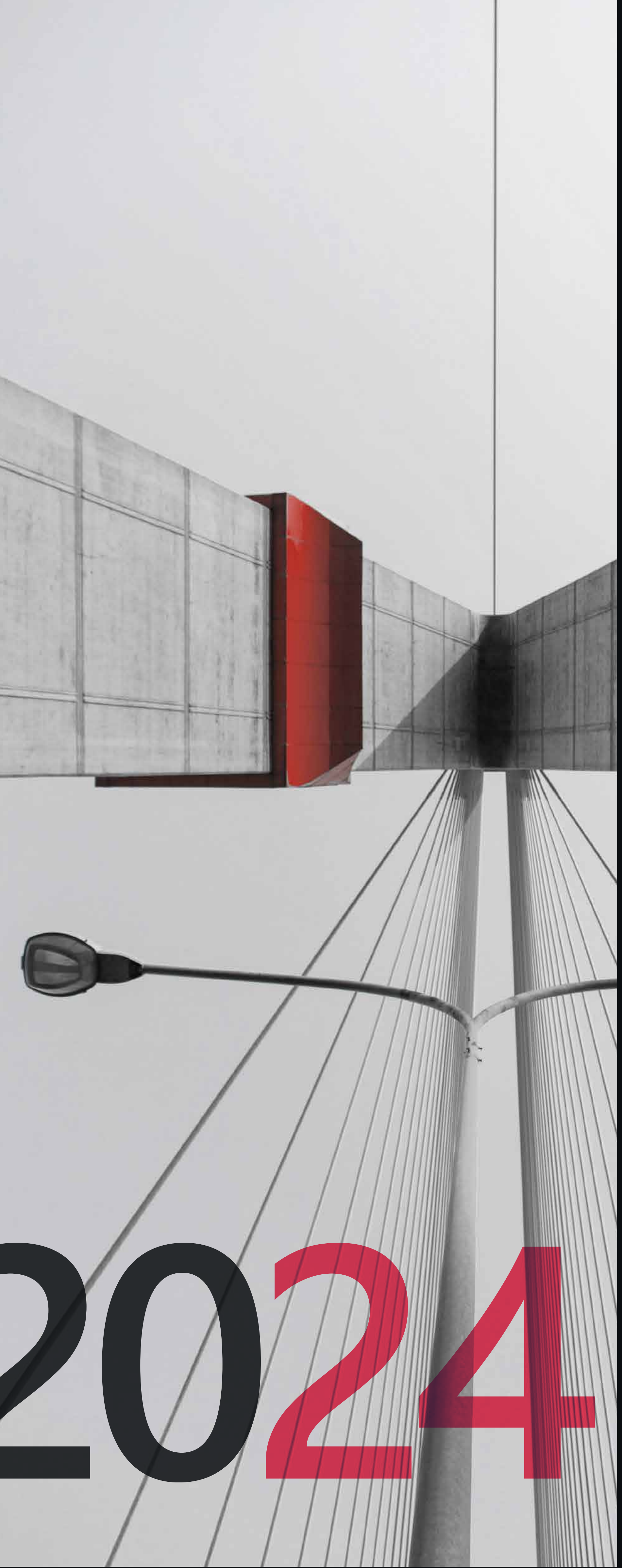
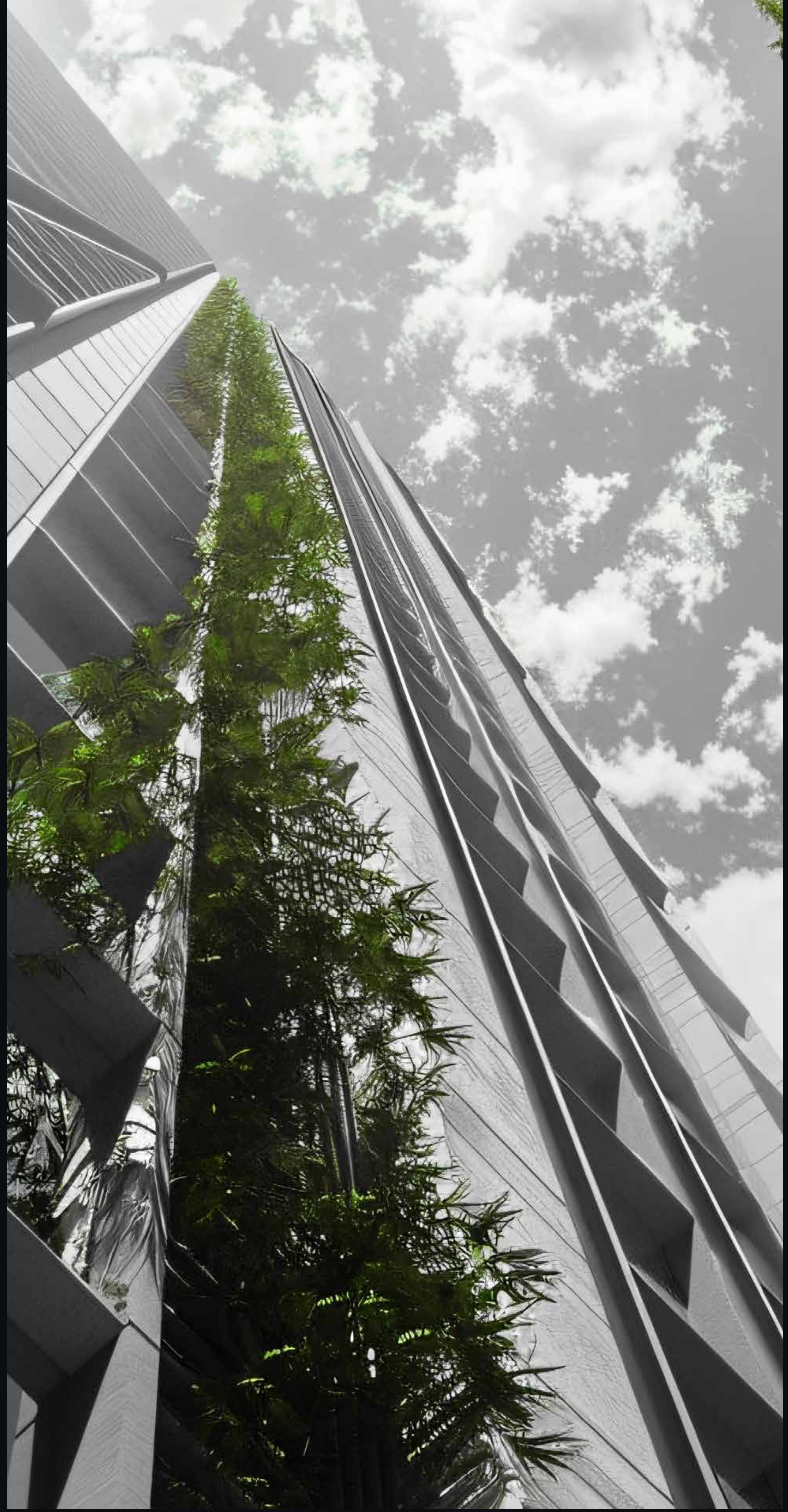
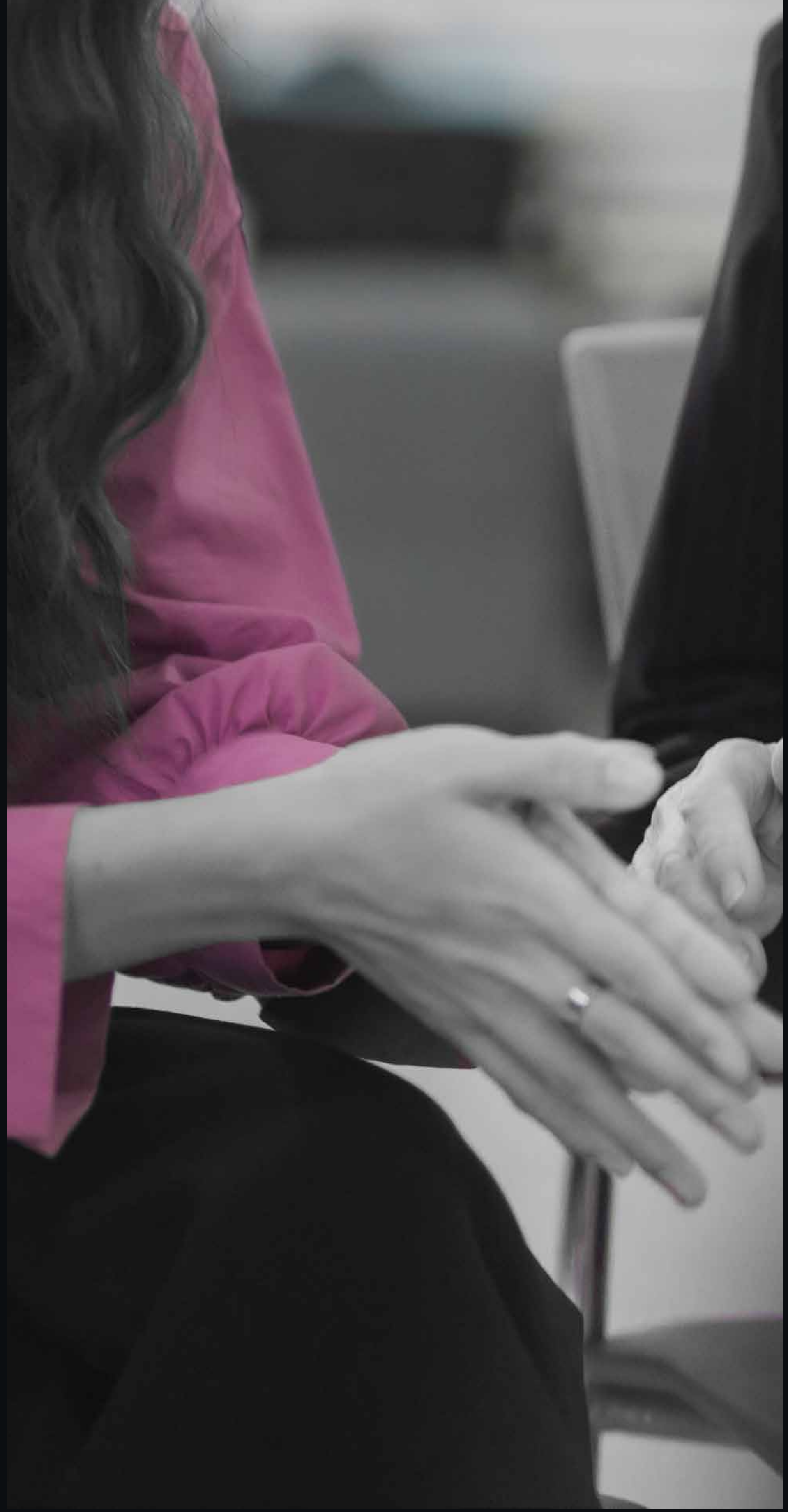





2024

Sustainable Development Report

ELLAKTOR GROUP

Contents

Message from the Management

2024 marked a pivotal year that further underscored the importance of sustainability, responsibility and transparency in corporate operations. In an environment shaped by ongoing geopolitical developments, escalating climate-related challenges, increasingly stringent regulatory requirements and evolving stakeholder expectations, ESG performance has become a strategic and fundamental pillar guiding decision-making across all sectors of the economy.

The challenges facing businesses are becoming increasingly complex and dynamic, requiring greater agility, resilience and preparedness. The transition to a low-carbon economy calls for accelerated investment in green technologies and sustainable infrastructure, supported by transparent and resilient supply chains. At the same time, social cohesion and inclusion have emerged as critical priorities for strengthening trust among stakeholders and employees alike. Furthermore, the evolving regulatory landscape in Europe, including the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), together with global developments, reinforces the need for robust, high-quality and measurable ESG reporting.

Against this backdrop, the challenge—and at the same time the opportunity—for businesses is to embed sustainable development practices not as an external obligation, but as a key driver of long-term value creation. Continuously strengthening ESG performance requires strategic consistency, transparent processes, active leadership engagement and, above all, the empowerment and continuous development of the organisation's people.

At ELLAKTOR Group, sustainability has been at the core of the Group's business strategy over the past four years.

George Mylonogiannis
Chairman of the Board of Directors

Efthymios Bouloutas
CEO

Guided by internationally recognised standards and best practices, the Group has integrated ESG considerations into its corporate strategy, combining strong financial performance with positive environmental and social outcomes.

This Report provides a clear and comprehensive overview of the Group's sustainability progress and initiatives during 2024—a year marked by significant developments, strategic transformation and the further strengthening of the values that define ELLAKTOR Group.

Throughout 2024, the Group implemented a wide range of sustainability initiatives that resulted in a significant improvement in its ESG performance. In particular, ELLAKTOR Group achieved an ESG Transparency Score of **98% in the ATHEX ESG Index**, representing an increase of **3 percentage points** compared with the previous year and reaffirming its strong commitment to transparency across all areas of its operations. In addition, the Group ranked **1st** in Bloomberg's ESG assessment among companies with a primary listing on the Athens Stock Exchange, achieving an outstanding **ESG Score of 98.3**.

The Group was included for the first time in the **QualityNet Foundation's "The 50 Most Sustainable Companies in Greece"** list for 2024 and achieved an **Overall A Score** on the **Synesgy** platform following an assessment based on internationally recognised ESG standards. In addition, for the second consecutive year, the Group submitted its **Climate Change Questionnaire** to the **CDP** and received a **B rating**, demonstrating its continued commitment to transparent climate-related disclosure and the effective management of climate-related risks and opportunities.

The strategic transformation that continued throughout 2024 enabled the Group to further unlock and demonstrate its underlying value. The Group reported **net profit of more than €57 million and net sales of €353.8 million**, while **€174 million** was returned to shareholders during the year. Furthermore, in the **first quarter of 2025**, the Group completed an **additional €296 million capital return**, bringing the total amount returned to shareholders to €470 million—more than double the Company's market capitalisation at the beginning of 2021.

Environment

The Group's environmental performance in 2024 reflects its consistent and targeted commitment to addressing climate change and advancing towards climate neutrality. In this context, the Group completed the development of its **Net Zero Roadmap, setting out a clear pathway and strategic priorities for achieving net zero greenhouse gas emissions by 2050** and supporting the transition to a more sustainable energy and operating model.

In parallel, the Group conducted an assessment of climate-related risks and their potential financial impacts in line with the recommendations of **the Task Force on Climate-related Financial Disclosures (TCFD)**, further strengthening the resilience and transparency of its business decision-making processes. The Group also committed to the **Science Based Targets initiative (SBTi)** to set science-based near-term greenhouse gas emissions reduction targets, reinforcing its commitment to climate action and the transition to a low-carbon economy.

The impact of these strategic initiatives is reflected in the Group's measurable environmental performance:

- **19% reduction** in Scope 1 and Scope 2 greenhouse gas emissions compared with 2023.
- **221 GWh** of renewable energy generated.
- **1.076 million tonnes** of third-party CO_2 eq.
- **862 thousand tonnes** of third-party solid waste processed at the Group's treatment facilities.
- **99% diversion** of waste generated from the Group's operations from disposal.
- **€1,085,218** invested in environmental protection projects.

These achievements reaffirm the Group's long-standing commitment to a growth strategy that goes hand in hand with environmental protection and the responsible use of natural resources.

Society

The social dimension remains a strategic priority for ELLAKTOR Group, which continues to contribute to social well-being both through its business activities and through targeted corporate social responsibility (CSR) initiatives that address the evolving needs of society. In 2024, the Group further strengthened its CSR programme, placing particular emphasis on supporting the younger generation, empowering its people and fostering a safe, healthy and inclusive working environment free from discrimination.

As part of its efforts to strengthen a corporate culture founded on Diversity, Equity and Inclusion (DEI), the Group delivered training programmes on topics including Unconscious Bias and the Prevention of Violence and Harassment in the Workplace. At the same time, it designed and implemented initiatives aimed at raising awareness and continuously engaging employees on sustainability and corporate social responsibility issues.

Among the Group's most significant initiatives in 2024 were:

- **The implementation of a Human Rights Due Diligence process,** ensuring responsible business conduct across the Group's value chain.
- The **continuation of long-standing partnerships with organisations** supporting vulnerable social groups, reinforcing the Group's long-term commitment to creating positive social impact.

The Group also delivered strong performance in fostering an inclusive workplace and creating positive social impact:

- **Women represented 49%** of the workforce at **ELLAKTOR S.A.** and **71% at REDS S.A.**
- **86% of employees and 87% of management personnel were recruited from local communities,** contributing to social cohesion and sustainable local development.
- A total of **873 Health and Safety toolbox talks were conducted, together with 2,156 hours** of Health and Safety training.

- Finally, the Group's **total investment in local communities amounted to €1.3 million.**

As part of its corporate social responsibility initiatives with an environmental impact aimed at mitigating the effects of climate change, ELLAKTOR Group supported the **"GREEN FUTURE"** environmental education programme of the non-profit environmental and humanitarian organisation **We4All**, which focuses on delivering environmental education in schools, with particular emphasis on the areas where the Group operates. More specifically, during 2024, **40 environmental educational activities were carried out in primary and secondary schools across Greece, with the participation of 1,466 children.**

At the beginning of 2024, the Group launched the **"SDGs Coffee Breaks"** programme, an employee awareness and engagement initiative on the **17 United Nations Sustainable Development Goals (SDGs)**, in collaboration with the non-profit initiative **Wise Greece**. The programme was completed during 2025.

Governance

With regard to the Governance pillar, 2024 was marked by targeted initiatives that strengthened transparency and compliance with the principles of good corporate governance. Throughout the year, ELLAKTOR Group **further enhanced its corporate governance framework through focused actions and the reinforcement of its governance mechanisms.**

As part of these efforts:

- A **new ESG-based business partner assessment platform** was adopted to strengthen the evaluation of business partners against ESG criteria.
- A risk-based **compliance audit and internal inspection programme** was designed and implemented.
- The **Anti-Corruption Policy** was updated, further strengthening the Group's culture of integrity.
- **Five specialised Board Committees** operated throughout the year, enhancing transparency and governance effectiveness.
- Certification to **ISO 22301:2019** for the Business Continuity Management System (BCMS) was maintained, demonstrating the Group's commitment to organisational resilience and preparedness in responding to crises and unforeseen events.

The Group's governance performance is reflected in the following achievements:

- **0 confirmed incidents** of corruption, bribery or conflicts of interest.
- **Participation in 3 research projects.**
- **€619 thousand** invested in digital transformation during the previous year.
- **96%** of the Group's **procurement expenditure** was sourced from domestic suppliers, supporting the local economy and enhancing transparency across the supply chain.

These initiatives reaffirm the **Group's commitment to a strong, transparent and responsible governance framework,** providing the foundation for its long-term sustainable development.

2024 marked a year of meaningful progress for ELLAKTOR Group in the field of sustainability. Through targeted initiatives, strengthened governance mechanisms, investments in digital transformation and a clear commitment to social well-being and environmental responsibility, the Group consistently maintained its ESG strategy at the core of its operations.

Our performance in 2024 confirms that sustainable development is not merely an objective, but a way of thinking and acting. Reducing our environmental footprint, promoting equality and respect for diversity in the workplace, and further strengthening our governance framework through transparency and integrity demonstrate our commitment to remaining actively engaged and accountable in addressing the challenges of today and tomorrow.

In an international environment that is constantly evolving and continuously presenting new requirements and expectations, we remain committed to adapting with agility, foresight and responsibility. We continue to focus on creating long-term value for our people, our shareholders and society at large, placing people, the planet and the principles of good governance at the centre of everything we do. Confident in our capabilities and steadfast in our commitment to sustainable development, we move forward, further strengthening our positive impact.

George Mylonogiannis	Efthymios Bouloutas
Chairman of the Board of Directors	**CEO**

At a Glance **2024**

ELLAKTOR Group

Ranked
1st
by Bloomberg among companies with a primary listing on the Athens Stock Exchange, achieving a score of 98.3

Achieved a
98% ESG Transparency Score in the ATHEX ESG Index

Recognised
among "The 50 Most Sustainable Companies in Greece" for 2024 by the QualityNet Foundation

87%
of the Group's activities were classified as Taxonomy-eligible under the EU Taxonomy Regulation

Environment

Climate Change & Circular Economy

221 GWh
of renewable energy generated

1,076 thousand tonnes
of third-party CO_2 eq emissions avoided

19%
reduction in Scope 1 and Scope 2 greenhouse gas emissions compared to 2023

89%
of total energy consumption from renewable energy sources

More than
€1 million
invested in environmental protection projects

Society

Health, Safety and Employee Development

71%
women employees at REDS S.A.

592 training hours
delivered to **248** employees on the 17 Sustainable Development Goals through the "SDGs Coffee Breaks" programme

2,156 hours
of Occupational Health and Safety training delivered

Social Responsibility

€1.3 million
invested in local communities

1,096 volunteer hours

Educational programme delivered in
40 schools across Greece through the "GREEN FUTURE" initiative

Governance

Integrity and Business Ethics

5
Board Committees supporting the effective governance of the Group

96%
of the Group's procurement expenditure was sourced from local suppliers

0
confirmed incidents of corruption, bribery and conflicts of interest across the ELLAKTOR Group

Innovation & Digital Transformation

Participation in
3 research projects

€619 thousand
invested in digital transformation

Launch
of a new platform for the collection of ESG data

Key Segments

Real Estate Development & Services

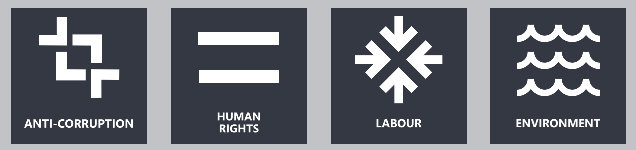
Concessions

Environment

ELLAKTOR Group

Alignment with the Sustainable Development Goals

Alignment with the Principles of the United Nations Global Compact



MAIN ACHIEVEMENTS

Achievement of a 98% score on the ATHEX ESG Index

Distinction in 'The 50 Most Sustainable Companies in Greece' for 2024 by the QualityNet Foundation

1st place on Bloomberg among companies with a primary listing on the Athens Stock Exchange, achieving a score of 98.3

OUR PERFORMANCE

€353.8*
million in net sales

87%*
of the Group's activities are classified as eligible, in accordance with the EU Taxonomy Regulation

*Continuing and discontinued operations

The Group returned
€470 million**
in value to shareholders (€1.35 per share)

**Total capital return in July 2024 and March 2025

ELLAKTOR Group's 2024 Sustainability Report has been prepared in a consolidated form, with the same scope of consolidation as that of the financial statements for all the Group's subsidiaries.[1] This Report is based on the GRI Standards, the ATHEX ESG Guide 2024, as well as other frameworks referenced in detail in the Appendix. It presents indicators derived from the double materiality analysis, as well as those deemed significant by the Group to ensure comparability with the previous year's report.

[1]The group of companies managed by HESTIA, which was acquired on 5 December 2024 and operates in real estate management, has not been included in the ESG performance assessment. This group has no available workforce and a negligible environmental footprint and has been classified as a non-material participation in the consolidation.

Presentation of the Group

ELLAKTOR Group is one of the leading infrastructure groups in Greece, with a portfolio of activities in the sectors of Concessions, Real Estate Development and Management, and Hospitality. Leveraging the long-standing experience and expertise of its people, the Group operates in full alignment with its values and vision, aiming for growth based on the principles of sustainability.

The Group was also active in the Environmental sector through its subsidiary company HELECTOR until January 2025, when its sale was completed. This segment is presented in this Report as a discontinued operation.

Historical Overview

1949-1980
Establishment of three construction companies: Techniki Etairia Volou (TEV), Helleniki Technodomiki, and AKTOR

1996
Signing of the first concession contracts (ATTIKI ODOS and Rio–Antirrio Bridge)

1999
Merger of AKTOR, TEV, and HELLENIKI TECHNODOMIKI

2001
Entry into the Renewable Energy Sources (RES) market

2002
Establishment of the new subsidiary REDS in the real estate development and management segment

2003
Entry into the waste management segment with the establishment of HELECTOR

2008
Change of corporate name to ELLAKTOR

Signing of the concession contracts for MOREAS, OLYMPIA ODOS, and Aegean Motorways

2017
Completion of the OLYMPIA ODOS and Maliakos–Kleidi motorways

2016
Completion and operation of the MOREAS motorway

2007
Establishment of AKTOR CONCESSIONS

2020
Signing of the concession project for Alimos Marina for 40+10 years

2022
Sale of 75% of the RES segment

2023
Sale of the Construction segment and the Smart Park of the Real Estate Development and Management segment

2024
Sale of the remaining 25% of the RES segment

Signing of a 25-year hotel property lease agreement between REDS (in a joint venture with SWOT Hospitality) and the Hellenic Olympic Committee (EOC)

Acquisition of Athens Properties BV by the subsidiary company REDS

2025
Completion of the sale of the Environment segment

Group Structure – Countries of Operation

The Group, consisting of 64 subsidiary companies, more than 14 associates, 2 joint ventures, and 35 joint operations, recorded a turnover of €353,818 thousand for the fiscal year 2024 and operates in 4 countries, as illustrated in the following chart.

All the Group's companies, as well as the joint ventures, are presented in the [2024 Annual Financial Report.]

[1]Athens Properties BV, a company incorporated in the Netherlands, has not been included among the countries of operation, as its revenue is derived exclusively from its activities in Greece. Furthermore, ELLAKTOR VALUE PLC (United Kingdom), Levashovo Waste Management Project LLC (Russia), and the joint venture Consortium AKTOR SA – HELECTOR SA (Bulgaria) are not presented under the countries of operation, as they generated no revenue in 2024.

4 countries **Germany, Greece, Cyprus, Romania**

Shareholding Structure

ELLAKTOR S.A. has been incorporated and is based in Greece. Its registered office and headquarters are located at 25 Ermou Street, 145 64, Kifissia, Attica.

The shareholding structure of ELLAKTOR S.A., according to the latest notifications of obligated persons (Law 3556/2007) as of 31.12.2024, is presented in the following chart.

Total
348,192,005

- REGGEBORGH INVEST B.V.
  167,672,350 - 48.15%
- MOTOR OIL (HELLAS) CORINTH REFINERIES S.A
  93,600,000 - 26.88%
- Institutional and Private Investors
  52.009,795 - 14.94%
- Atlas NV
  34,114,860 - 9.80%
- Treasury shares
  795,000 - 0.23%

Further information regarding the Company's shareholding structure is provided in the 2024 Annual Financial Report.

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 people, we deliver high-quality infrastructure and tourism development projects, creating value for our shareholders, our employees, and the Greek economy and society.

VALUES

Meritocracy and Equal Opportunities
We promote integrity, meritocracy, and equal opportunities in the workplace, with respect for diversity.

Collaboration and Excellence
We encourage teamwork, cooperation, and the pursuit of excellence at both the individual and collective level.

Progress and Competitiveness
We are committed to the quality of our work, the transparency and flexibility of our operations, and the continuous improvement of our competitiveness.

Innovation and Best Practices
We invest in innovation, cutting-edge technologies, and best practices, aiming for our continuous advancement.

Integrity and Respect
We operate with transparency and with environmental and social awareness, encouraging the treatment of all people with respect and dignity.

Encouragement and Development
We believe in the expertise and experience of our people and support continuous learning to further their professional growth.

Health and Safety
We operate with the health and safety of our people as a top priority.

Key Segments

Following the sale of the Environment segment, the Group operates through its subsidiary companies in the segments of Real Estate Development and Management, Concessions, and Hospitality.

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 and primarily concern the segments of Real Estate Development and Management, Concessions, and Hospitality. The company's shares have been listed on the Athens Stock Exchange since April 1994.

REAL ESTATE DEVELOPMENT & SERVICES

REDS S.A., a company of the ELLAKTOR Group, is one of the leading real estate management and development companies in Greece. REDS S.A., a member of the ELLAKTOR Group, operates in the sectors of Real Estate Development & Services, as well as Hospitality Services. The company's investment focus lies in the acquisition of properties for tourism development and accommodation/hospitality facilities. REDS holds in its portfolio the Concession Agreement for the right to use, operate, manage, and exploit Alimos Marina. The concession of Alimos Marina provides, among other things, the opportunity to develop the land area of a total surface of 210,000 sq.m. for a wide range of tourism, cultural, and leisure uses. This enables the implementation of an integrated tourism investment along the rapidly developing coastal front of the Greek capital, creating substantial added value both locally and nationally.

Important events

The Real Estate Development segment recorded revenues of €3.7 million in 2024, compared to €10.4 million in 2023, marking a decrease of 64.3% or -€6.7 million. Earnings before interest, depreciation, and taxes (EBITDA) for 2024 amounted to a loss of €1.4 million, compared to a profit of €61.7 million in 2023.

In September 2024, REDS, through an intra-group transaction, acquired all the shares of the company Development of the New Alimos Marina from AKTOR Concessions, thereby strengthening its portfolio not only with the design and construction contract of the project but also with the concession contract.

In July 2024, REDS, participating in a joint venture with SWOT Hospitality (70%-30%), signed a lease agreement with the Hellenic Olympic Committee (EOC) for the hotel property owned by the EOC, located on Kifisias Avenue in Marousi. REDS's plan includes the renovation of the hotel with the aim of creating a fully modernized hospitality unit.

Finally, in December 2024, as part of its broader strategy, REDS completed the acquisition of Athens Properties BV, a company that, through its subsidiaries, owns 10 operational, standalone, mixed-use properties located in the center of Athens.

It is worth noting that on 22 May 2024, the Extraordinary General Meeting of REDS shareholders decided on the delisting of all the company's shares from the Athens Stock Exchange.

2024 Review

€3.7 million

turnover

Transfer from AKTOR Concessions to REDS of its participation in Alimos Marina, for a consideration of with a total value of

€31 million

Signing of a Sale and Purchase Agreement (SPA) for the sale of the Cambas and Gournes properties, with a total value of

€85.6 million

Acquisition of Athens Properties BV for

€80 million

Further information regarding the outlook, risks, and uncertainties of the Real Estate Development & Management segment is presented in the [2024 Annual Financial Report.]

Main Companies:

REDS REAL ESTATE DEVELOPMENT S.A., DEVELOPMENT OF THE NEW ALIMOS MARINA S.M.S.A., Athens Properties BV, Hestia Single-Member P.C., PMS PROPERTY MANAGEMENT SERVICES S.A.

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 paved the way for major Concession Projects in the country as early as 1990, the portfolio of AKTOR CONCESSIONS today includes participations in the largest and most modern motorways in Greece.

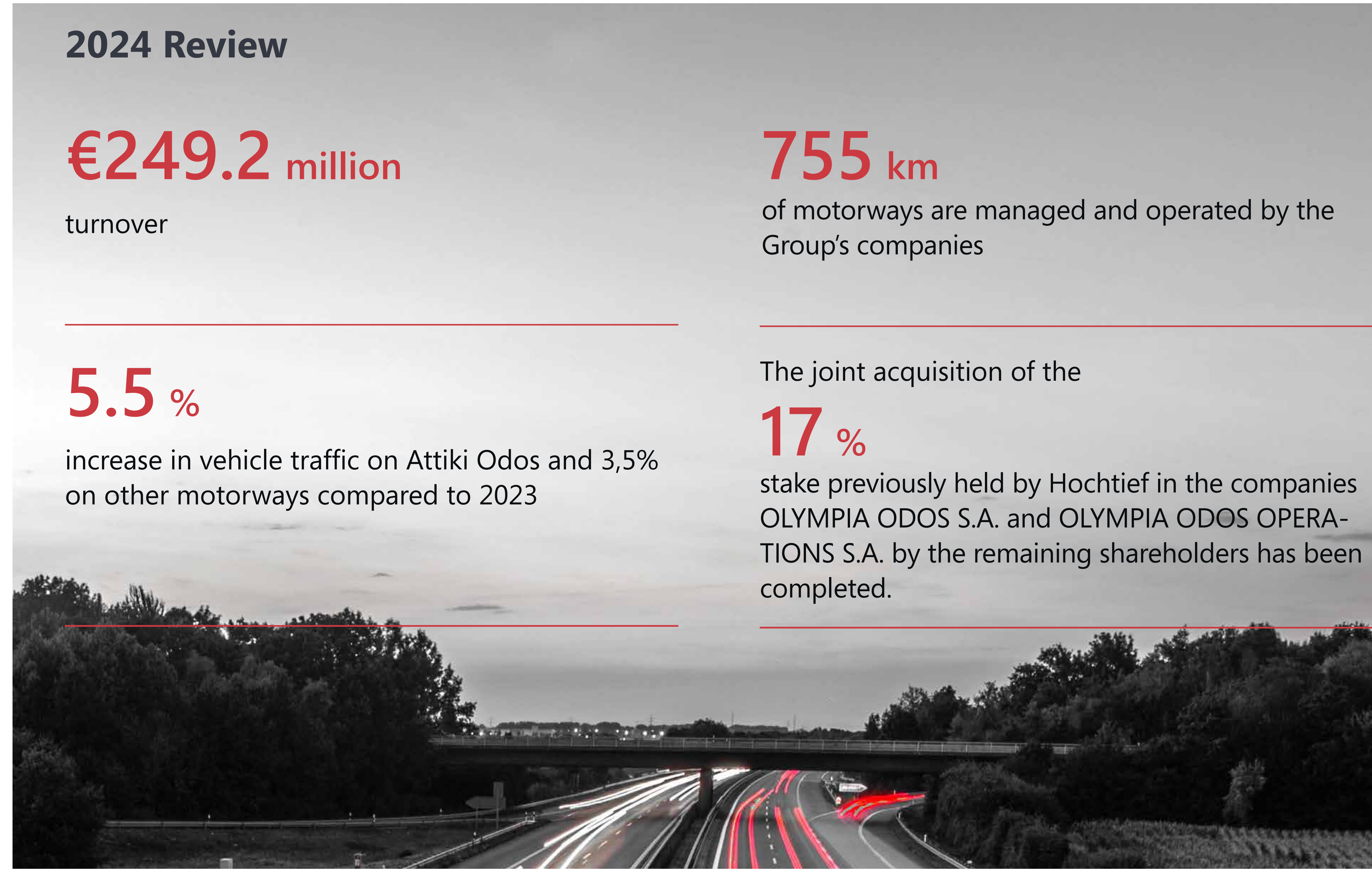
Important events

During the financial year 2024, revenues of the Concessions segment amounted to €249.2 million, compared to €283.0 million in 2023, reflecting a decrease of 11.9% or €33.8 million. This decrease is attributable to the non-consolidation of Attiki Odos for the full year 2024, following the expiration of the Attiki Odos concession agreement on 5 October 2024 and its subsequent return to the Greek State.

EBITDA of the Concessions segment in 2024 amounted to €166.8 million, compared to €180.2 million in the previous year, recording a decrease of 7.4% or €13.4 million, mainly affected by the expiration of the Attiki Odos concession agreement, as mentioned above. The EBITDA margin stood at 67% in 2024, compared to 64% in the prior year.

Accordingly, operating profit (EBIT) amounted to €108.8 million, compared to €111.8 million in 2023, representing a decrease of 2.7%. Profit before tax stood at €85.8 million versus €89.8 million (a decrease of 4.5%), while profit after tax amounted to €63.7 million, compared to €68.6 million in 2023 (a decrease of 7.0%).

On 30 April 2025, the Company entered into a Share Purchase Agreement (SPA) for the sale to AKTOR S.A. Holdings, Technical and Energy Projects of the entirety (100%) of its equity participation in AKTOR CONCESSIONS S.A. The transaction is subject to approval by the Hellenic Competition Commission, all other approvals and permits required by law, as well as the approval of the General Meeting of the Company's shareholders.



2024 Review

€249.2 million

turnover

755 km

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

5.5 %

increase in vehicle traffic on Attiki Odos and 3,5% on other motorways compared to 2023

The joint acquisition of the

17 %

stake previously held by Hochtief in the companies OLYMPIA ODOS S.A. and OLYMPIA ODOS OPERATIONS S.A. by the remaining shareholders has been completed.

Further information regarding the outlook, risks, and uncertainties of the Concessions segment is presented in the 2024 Annual Financial Report.

Main Companies:

AKTOR CONCESSIONS SINGLE-MEMBER S.A., ATTIKI ODOS S.A., ATTIKES DIADROMES S.A., MOREAS S.A., PYLIA ODOS S.A., ROAD TELECOMMUNICATIONS S.A., P&P PARKING S.A., STATHMOI PANTECHNIKI S.A.

ENVIRONMENT
(Discontinued Operation))

The Group was also active in the Environmental sector through its subsidiary company HELECTOR until January 2025, when its sale was completed. This segment is presented in the present Report as a discontinued operation. In January 2025, the transaction for the sale of HELECTOR S.A. was completed, following Decision No. 874/2025 of the Hellenic Competition Commission.

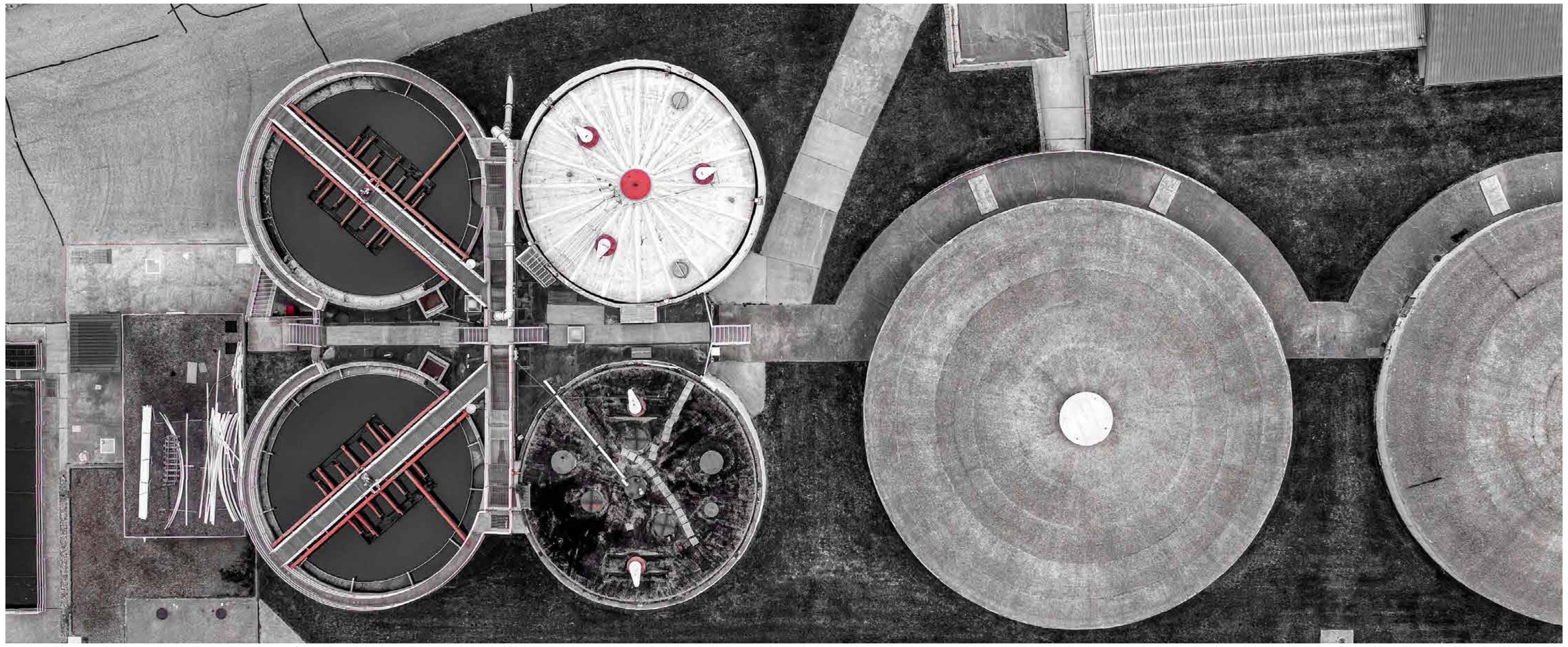
The Environment segment through its subsidiary, HELECTOR, in the provision of integrated waste management solutions, which include the study, construction, and operation of modern waste treatment facilities, as well as projects for the production of alternative fuels and the energy recovery of biogas and biomass.

Important events

The turnover of the Environmental segment for 2024 amounted to €100.2 million, at approximately the same level as in the previous year (€100.1 million), marginally increased by 0.1%. The EBITDA of the Environmental sector for 2024 amounted to €20.4 million, compared to €14.2 million in 2023, recording an increase of 43.7% or €6.2 million.

The EBITDA margin amounted to 20.4% for 2024, compared to 14.2% in the corresponding period of 2023. Operating results amounted to profits of €18.4 million, compared to €10.9 million in the corresponding period of the previous year (an increase of 68.4%). Profit before tax amounted to €19.7 million, compared to €12.9 million (an increase of 52.2%), while profit after tax amounted to €13.4 million, compared to €8.6 million in the corresponding period of 2023 (an increase of 56.1%).

Further information regarding the outlook, risks, and uncertainties of the Environment segment is presented in the 2024 Annual Financial Report.



2024 Review

€100 million
turnover

9 RES projects
with a total installed capacity of 44.8 MW

862,031 tonnes
of incoming waste for management

218,205 MWh
of net electricity generated from (RES)

Main Companies:

HELECTOR S.A., STEILISATION 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.

Value Chain and Business Relationships

ELLAKTOR Group carried out a mapping and assessment of its value chain to identify the Sustainable Development issues related to the activities of its Business Partners across all segments, in which the Group operates

UPSTREAM

- Consulting & audit services
- Financial Institutions
- Operation & Maintenance services for projects
- Communication & advertising media

- Consulting & audit services
- Financial Institutions
- Energy Supply
- Operation & Maintenance services for projects
- Fuel trading

- Energy Supply
- Water Supply
- Supply of electromechanical (E/M) equipment
- Financial Institutions

ELLAKTOR GROUP SEGMENTS

Real Estate Development and Services

Acquisition and ownership of buildings; floating transport infrastructure

Concessions

Construction, operation, and maintenance of road transport and public transport systems

Environment

Waste management (hazardous & non-hazardous)
Electricity generation from wind energy
Collection and utilization of biogas from landfill sites

DOWNSTREAM

- Clients (Private or/and Public)
- Tourist marina service users
- Waste Management Services

- Customers (Private individuals and/or the Public Sector, e.g. motorway users, service area tenants)
- Waste Management Services

- Clients (Private or/and Public)
- Materials & Waste Management Services
- Regional Associations of Waste Management Authorities, Local Government Authorities, Municipalities

For more information regarding the countries in which the Group operates and any potential risks in the value chain, please refer to the 2024 Annual Financial Report, the Sustainability Statement, in the section "Value chain and business relationships".

Business Model

Economic Value Generated and Distributed

Through the creation and distribution of economic value, ELLAKTOR Group ensures its business continuity, enhances its positive impact on society, and returns value to its stakeholders. The Group contributes to social well-being through its business activities, responding to the expectations of the local as well as the wider community.

Group Financial Results for 2024

The Group's consolidated revenue from all its activities in Greece and abroad for the 2024 financial year amounted to €353.8 million, of which €253.6 million related to the Group's continuing operations, compared to €287.4 million in 2023, representing a decrease of approximately 11.7%.

The consolidated financial data of the Group for the 2024 fiscal year reflects the following key indicator:

Assets:
€1,503,248 th.

Liabilities:
€726,452 th.

Equity:
€776,796 th.

Economic Value 2024 (th. €)	ELLAKTOR Group (Total)	Continuing Operations
Net Sales	353,818	253,643
Financial income, other income and profits	58,780	55,410
Economic value generated	**412,597**	**309,053**
Operating cost[1]	197,925	149,205
Employees' salaries and benefits	**76,290**	**44,902**
Salaries and wages	54,194	28,332
Social insurance expenses	10,804	6,182
Costs of defined benefit programs	1,987	1,644
Other benefits to employees	9,304	8,744
Payments to capital providers	62,161	60,150
Payments to Government Entities	**17,497**	**9,557**
Greece	9,463	9,463
Cyprus	0	0
Germany	0	0
Romania	94	94
Discontinued Operations	7,941	0
Contribution to Society[2]	1,324	1,274
Economic value distributed	**355,198**	**265,087**
Economic value retained	**57,400**	**43,966**

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

[2]The €50,4 th. is the compensatory fee of 3% on the turnover (sales before VAT) of the wind farms that isretained and paid to the local community and the Green Fund (Discontinued Operations).

The 2024 Annual Financial Report, which includes the Board of Directors' Report and the Annual Financial Statements, is available on the Group's website.

ELLAKTOR Group Business Model

INPUTS

Financial capital

€776.8 million
Net Equity of the Group

€111.1 million
Net borrowing

Productive capital

€141.9 million
Tangible Fixed Assets

€152.3 million
Intangible Assets and Concessions Rights

Intellectual capital

€619 th.
Investments in Digital Transformation

Human capital

1,585
Own workforce

4,709
Training hours for Employees

Natural capital

648,194 MWh
Energy Consumption

1,134 ML
Water Withdrawal

Social capital

96%
Supplies from local suppliers

86%
Employees from local communities

VALUE CREATION

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 and tourism development projects, creating value for our shareholders and employees, as well as for the overall Greek Economy and Society.

VALUES

- Meritocracy & Equal Opportunities
- Collaboration & Excellence
- Achievement & Efficiency
- Innovation & Best Practices
- Integrity & Respect
- Encouragement & Advancement
- Health & Safety

KEY SUSTAINABLE DEVELOPMENT PRIORITIES

MAIN OPERATIONS

- Real Estate Development and Services
- Concessions
- Environment (Διακοπείσα Δραστηριότητα)

OUTCOMES

Financial capital

€353.8 million
Consolidated Revenue

€170 million
EBITDA

Productive capital

12
RES projects in operation

755 km
Motorways under management

Intellectual capital

Participation in **3** research projects

Human capital

€76.3 million
Employee benefits

Zero incidents of human rights violations, corruption, and bribery

Natural capital

221 GWh
Net electricity generated from Renewable Energy Sources

862,031 tonnes
of waste under management

Social capital

€34.0 million
Taxes paid

€1,324,144
investment in Society

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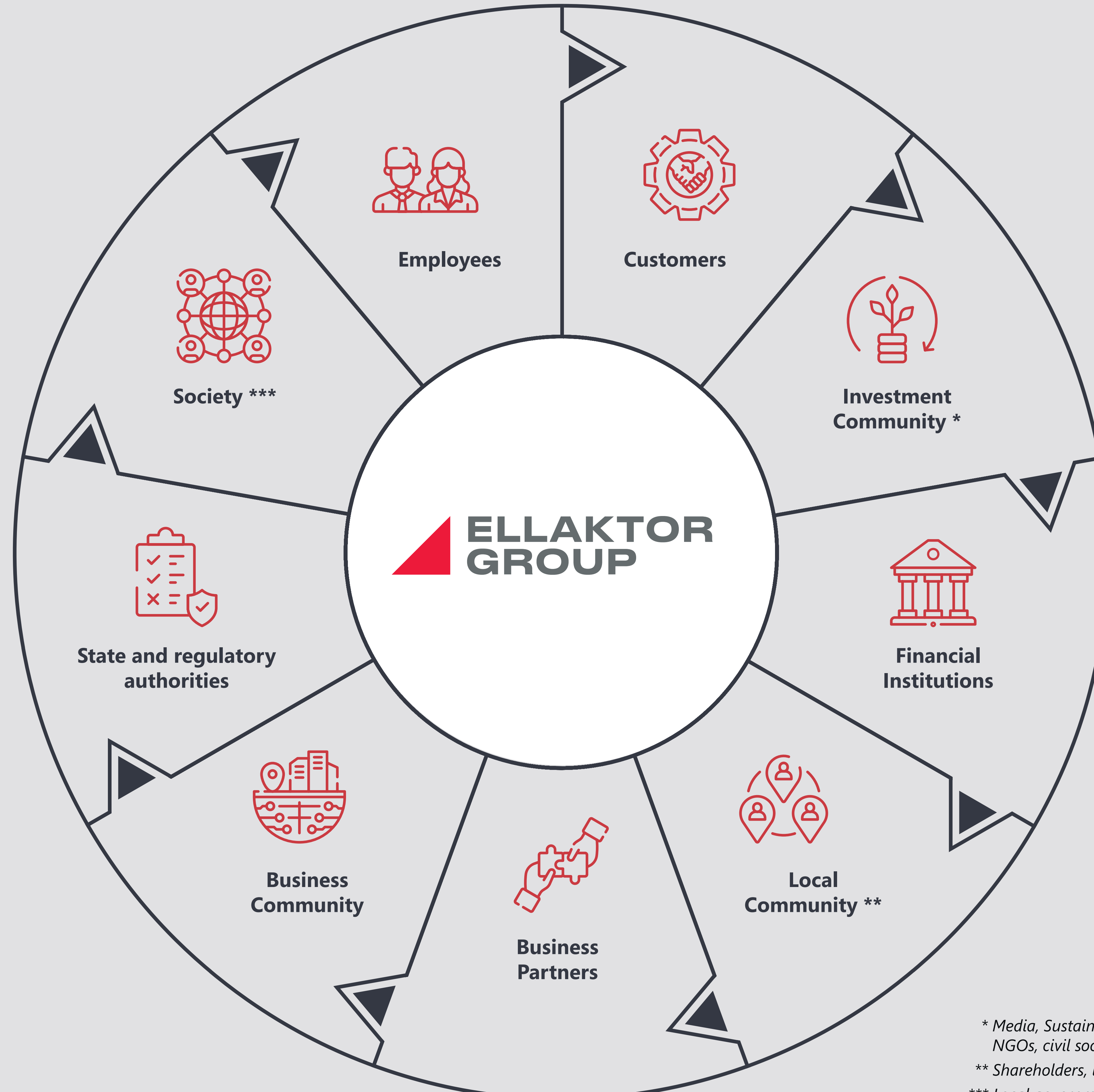
Annex

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).



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

** Shareholders, investors and ESG rating agencies

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

For more information on stakeholder engagement, please refer to the subsection "Stakeholder needs and views [SBM-2]" of section "B.4.1.3 The ELLAKTOR Group's Sustainable Development Strategy and Business Model" in the [2024 Sustainability Statement.]

Materiality Analysis

With the aim of identifying and assessing the material sustainable development topics related to its operations, ELLAKTOR Group conducted a materiality assessment, adopting the double materiality approach in accordance with the requirements of the ESRS. The concept of double materiality involves the identification of significant impacts from the inside-out perspective, as well as financial risks and opportunities from the outside-in perspective. Through the double materiality analysis, it is highlighted how the Group affects the environment, society, and governance, and how these areas, in turn, affect the Group.

Within the framework of this exercise, the impacts arising from the Group's activities that affect or may affect the environment, society, the economy, and human rights were evaluated, as well as the way in which the Group is affected or may be affected by ESG and sustainable development issues (risks and opportunities)

The impacts and risks identified through the double materiality assessment process, conducted in the context of the publication of the Sustainability Statement for the financial year 2024, are summarized in the figure below.

Results of the Double Materiality Analysis

Society

	ESRS S1		ESRS S4	
	Own workforce		**Consumers and end-users**	**Topic**
Other work-related rights	Working conditions	Personal safety of consumers and/or end-users	Impacts related to information about consumers and/or end-users	**Sub-topic**
Privacy	Health and Safety	Health and Safety	Privacy	**Sub-sub-topic**

Environment

ESRS E1

Topic	**Climate change**
Sub-topic	Climate Change Mitigation / Energy Climate Change Adaptation

Governance

ESRS G1

Topic	**Business Conduct**
Sub-topic	Protection of whistleblowers

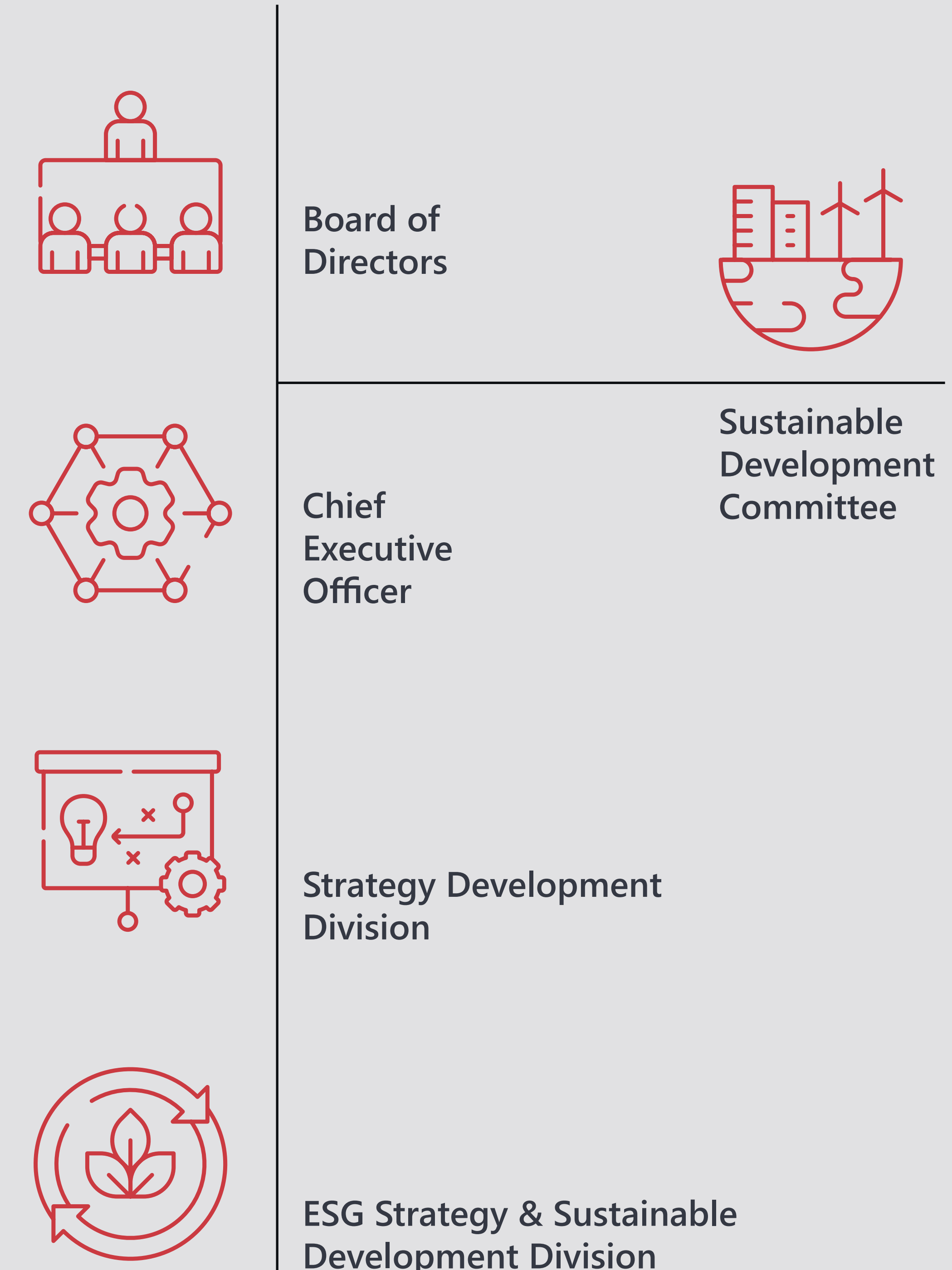
For more information regarding the process for identifying and assessing the Group's material impacts, risks, and opportunities, please refer to section "B.4.1.2 Double Materiality Analysis of the ELLAKTOR Group" in the Sustainability Statement 2024.

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.

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 Division.

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 Division serves as the central body for strategic planning and for submitting recommendations to the Sustainability Committee and the Group's Management on matters related to environmental, social, and governance issues. It implements the ESG strategy action plan in collaboration with the relevant Divisions and business units, prepares the Group's Annual Sustainability Report, and monitors sustainability performance indicators with the aim of their continuous improvement. The ESG Strategy & Sustainable Development Division operates under the Group Strategy Development Division.

With regard to the integration of sustainability-related performance into incentive schemes, at this stage no sustainability criteria have been incorporated into the remuneration of Board and Committee members, and climate-related factors have not yet been included in the incentive program. However, the Company's Remuneration Policy provides for the incorporation of relevant incentives linked to sustainability matters. For more detailed information, please refer to the section "Integration of sustainability-related performance into incentive schemes [GOV-3]" of the Annual Financial Report 2024.

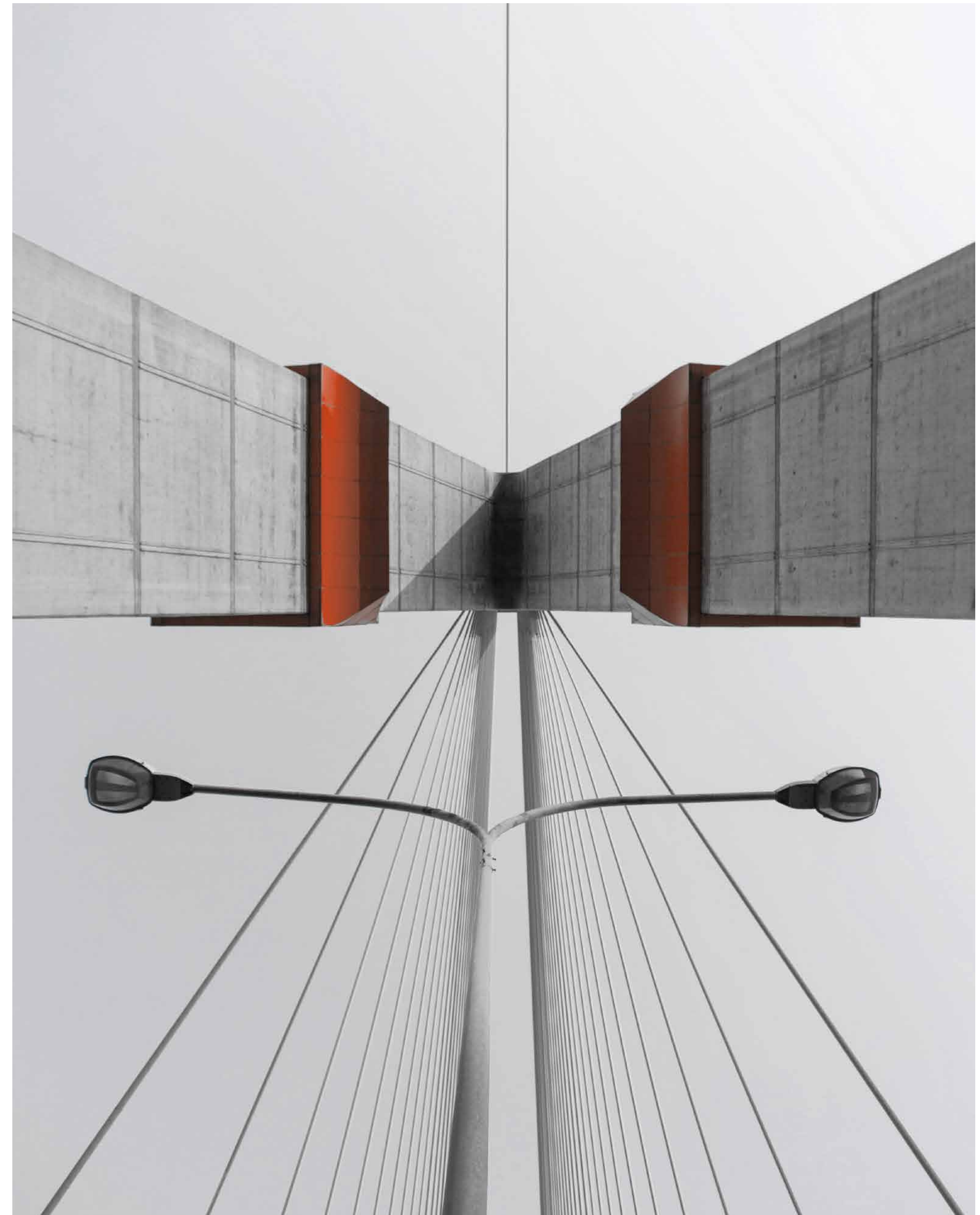
Sustainable Development Policy

The Group has adopted and implements a Sustainable Development Policy, which has been in effect since March 2022. The Policy aims to create long-term value for shareholders, employees, customers, and society at large, by integrating environmental, social, and corporate governance principles into all of its business activities. The purpose of this Policy is to establish the core principles governing the Group's sustainable development strategy, ensuring the integration of Environmental, Social and Governance (ESG) factors into the Group's business operations, particularly in relation to business ethics, climate change, and the development of its human capital, which have also been identified as material topics, with a view to creating value for stakeholders. The Policy applies to all Group companies, including those based abroad, and covers all employees as well as all of the Group's business partners, who are required to contribute, to the extent applicable to them, to its implementation.

Sustainable Development Strategy and Key Priorities

The business strategy of ELLAKTOR Group focuses on strengthening its footprint in Concessions, Real Estate Development & Management, and Hospitality segments. Placing the use of innovative practices and modern technologies at the core of every activity, the Group aims to develop sustainable, green, and safe infrastructure for both people and the environment, as well as to generate alternative energy sources, in order to address the need for resilience against climate change.

At Group level, the ESG Strategy & Sustainable Development Division operates with the primary aim and responsibility, among others, of formulating the sustainable development, social contribution, and environmental and energy management strategy for all Group companies. Its core responsibilities also include the supervision and support of the Group companies' activities in this field, as well as in matters relating to environmental and energy management.

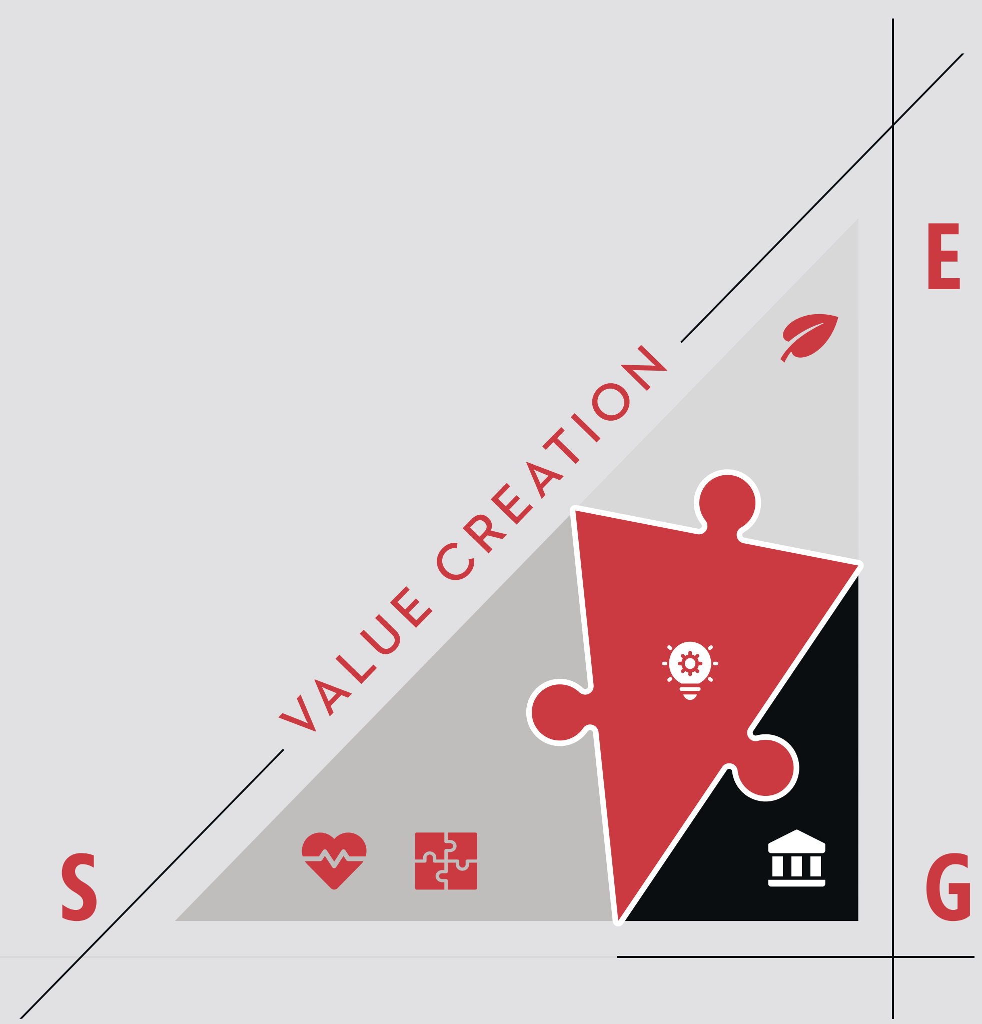


The process of comprehensively capturing the performance of the Group's companies in Sustainable Development matters for 2024 was carried out in accordance with recognized international and national standards, such as GRI, SASB, the Athens Stock Exchange ESG Reporting Guide, and the Bloomberg GEI. The process was conducted through an electronic platform, through which key quantitative data relating to sustainability issues were collected at company and project/activity level. The Group's objective is to enhance transparency and to continuously improve its performance in areas falling within the identified core strategic pillars of sustainable development.

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 are presented below:



Innovation & Digital Transformation

- ELLAKTOR Group is a modern group with diversified activities.
- Redesigns the way it operates, with a focus on transitioning to the new digital era.
- Explores opportunities for more effective utilization of technology across its activities.

Climate Change & Circular Economy

- Contributes to the collective European objective of a successful and sustainable transition to a climate-neutral economy, recognizing the risks and opportunities of climate change and seeking to adapt to its impacts.
- Integrates the principles of the circular economy across its entire range of activities, applying modern and innovative waste management methods.

Employee Health, Safety and Development

- Is committed to providing a healthy and safe working environment, with the objective of eliminating work-related injuries and occupational illnesses among its employees and business partners.
- -Invests in the well-being of its people and in fostering a healthy working environment by creating the appropriate structures and conditions that promote learning, development and recognition, while providing equal opportunities and supporting diversity and inclusion.

Social responsibility

- Operates responsibly in relation to the society in which it conducts business and contributes to social well-being through its business activities and social initiatives, consistently responding with responsibility and transparency to the needs and expectations of both the local and the wider community.

Integrity and Business Ethics

- Adopts best practices in business ethics, corporate governance, and risk management.
- Encourages its partners to implement responsible business practices.

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

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). In 2024, new targets were established based on the material topics identified through the double materiality analysis. The ESG Strategy is systematically monitored by the Group Strategy Development Division and the ESG Strategy & Sustainable Development Division, in collaboration with the Heads of the relevant Divisions, while the Sustainable Development Committee is kept informed of the progress made.

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.

Climate Change and Circular Economy

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress		Sustainable Development Goals
					Base Year	2024	
Climate change	Climate change	Climate Change Mitigation / Energy	▪ Reduce energy consumption from non-renewable sources by 10% by 2030		2023		7 Affordable and clean energy, 13 Climate action
			▪ Reduce Scope 1 and 2 emissions by 42% by 2030		2023		
			▪ 2050 zero greenhouse gas emissions*		2023		
			▪ Reduce indirect emissions (Scope 3) by 25% by 2030 *location based		2023		
Addressing Climate Risks		Climate Change Adaptation	▪ Identification and mitigation of climate risks with the aim of strengthening resilience and adaptive capacity		2021		11 Sustainable cities and communities, 13 Climate action

Short-term Targets: aligned with the reporting period used by the Company for its financial statements

Medium-term Targets: up to five years

Long-term Targets: more than five years.

Climate Change and Circular Economy

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress: Base Year	Progress: 2024	Sustainable Development Goals
Contribution to the circular economy	Circular economy Water and marine resources	Waste	▪ 80% waste diverted* from landfill		Ongoing target		6 CLEAN WATER AND SANITATION, 11 SUSTAINABLE CITIES AND COMMUNITIES, 12 RESPONSIBLE CONSUMPTION AND PRODUCTION, 14 LIFE BELOW WATER, 15 LIFE ON LAND
			▪ 90% waste diverted* from landfill		2021		
			▪ 100% diversion of waste* from landfill from the Group's projects by 2028 *Waste generated from the operation of the Group's projects*		2021		
		Water Marine resources	▪ 15% reduction in water withdrawal by 2030		2023		6 CLEAN WATER AND SANITATION, 12 RESPONSIBLE CONSUMPTION AND PRODUCTION, 14 LIFE BELOW WATER
Protection and conservation of biodiversity	Biodiversity and ecosystems	Impacts on the extent and condition of ecosystems Impacts on the condition of species	▪ Implementation of biodiversity protection management plans in 100% of projects located within or near environmentally sensitive areas		2022		13 CLIMATE ACTION, 14 LIFE BELOW WATER, 15 LIFE ON LAND

Health, Safety and Employee Development

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress: Base Year	Progress: 2024	Sustainable Development Goals
Strengthening the Health & Safety culture to achieve zero accidents	Own workforce	Working conditions / Health and safety Equal treatment and equal opportunities for all / Training and skills development	▪ 10 hours of training on average per employee on Health & Safety and wellbeing topics		2021	No progress	3 GOOD HEALTH AND WELL-BEING, 8 DECENT WORK AND ECONOMIC GROWTH
			▪ Training on Health & Safety and wellbeing topics for the Group's critical business partners		2023	No progress	
			▪ Zero fatal and high-consequence accidents		Ongoing target	1 high-consequence accident	
Employee privacy	Own workforce	Other labour rights / Privacy	▪ Zero incidents of personal data breaches		Ongoing target		8 DECENT WORK AND ECONOMIC GROWTH, 16 PEACE, JUSTICE AND STRONG INSTITUTIONS
			▪ 100% of employees will be trained on data privacy topics		2024	New target	

Short-term Targets: aligned with the reporting period used by the Company for its financial statements

Medium-term Targets: up to five years

Long-term Targets: more than five years.

Health, Safety and Employee Development

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress – Base Year	Progress – 2024	Sustainable Development Goals
Well-being	Own workforce	Working conditions / Social dialogue, Work-life balance, Adequate wages	■ Increase employee engagement rate		2019	No new employee satisfaction survey has been conducted	
			■ Participation of 100% of employees in well-being programmes		2022		
		Equal treatment and equal opportunities for all / Gender equality and equal pay for work of equal valueς	■ 100% of employees are paid a living wage by 2030		2023	100% of the Group's employees are paid at or above the statutory minimum wage of the respective country	
Strengthening diversity	Own workforce	Working conditions / Adequate wages	■ Equal representation, participation and leadership at all management levels by 2030		2023	No progress	
		Equal treatment and equal opportunities for all / Gender equality and equal pay for work of equal value, Diversity	■ Equal pay for work of equal value by 2030		2023		
Training & Evaluation	Own workforce	Equal treatment and equal opportunities for all / Training and skills development	■ Training of all employees on core thematic areas		2021		
			■ Maintain more than 25 hours of training on average per employee		2021	No progress	
			■ Annual evaluation of 100% of employees* *based on eligibility criteria		2023	No progress	
Promotion of Volunteering	Own workforce	Working conditions	■ 100% participation of employees* in the Group's volunteering initiatives * The indicator refers to employees who expressed their willingness to participate in volunteering activities through a relevant survey		2022		

Short-term Targets: aligned with the reporting period used by the Company for its financial statements

Medium-term Targets: up to five years

Long-term Targets: more than five years.

Social Responsibility

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress: Base Year	Progress: 2024	Sustainable Development Goals
Enhancing social contribution and responsiveness to community needs and expectations	Affected Communities	Civil and Political Rights / Freedom of Expression	▪ Consultation with local communities in 100% of new projects and responsiveness to their needs		Ongoing target		11, 16
Constructive engagement with stakeholders	Affected Communities	Civil and Political Rights / Freedom of Expression	▪ Strengthening engagement with stakeholders		2021		16, 17
Ensuring the quality and safety of services	Consumers and End-users	Impacts related to information for consumers and/or end-users / Freedom of Expression	▪ Conducting customer satisfaction surveys covering 100% of customers		2023	No progress	3, 11, 12, 13
		Personal Safety of Consumers and/or End-users / Health and Safety	▪ Zero non-compliance incidents related to quality		Ongoing target		
Consumer and end-user privacy	Consumers and End-users	Impacts related to information for consumers and/or end-users / Privacy	▪ Zero data breaches		Ongoing target		16

Integrity and Business Ethics

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress: Base Year	Progress: 2024	Sustainable Development Goals
Improving the ESG performance of business partners across the value chain	Value Chain	Value Chain Assessment	▪ Assessment of business partners against the ESG criteria established by the Group		2022		8, 10, 12, 13, 17

Short-term Targets: aligned with the reporting period used by the Company for its financial statements

Medium-term Targets: up to five years

Long-term Targets: more than five years.

Integrity and Business Ethics

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress: Base Year	Progress: 2024	Sustainable Development Goals
Strengthening the Anti-Bribery Framework	Business Conduct	Corruption and Bribery Incidents	▪ Zero confirmed bribery incidents		Ongoing target		16 Peace, Justice and Strong Institutions
Strengthening the Integrity Framework and reinforcing processes to maintain zero confirmed corruption incidents	Business Conduct	Corruption and Bribery Incidents	▪ Μηδενικά επιβεβαιωμένα περιστατικά διαφθοράς		Ongoing target		16 Peace, Justice and Strong Institutions
Effective Corporate Governance	Business Conduct	Corporate Culture Whistleblower Protection	▪ Certification and maintenance of the Anti-Bribery Management System in accordance with ISO 37001:2021		Ongoing target		16 Peace, Justice and Strong Institutions
			▪ Certification and maintenance of the Whistleblowing Management System in accordance with ISO 22301:2019		Ongoing target		
			▪ Certification and Maintenance of the Whistleblowing Management System in accordance with ISO 37002:2021		Ongoing target		

Innovation and Digital Transformation

Strategic priority	Link to Topic	Link to Sub-topic / Sub-sub-topic	Targets	Time Frame	Progress: Base Year	Progress: 2024	Sustainable Development Goals
Digital Transformation	Innovation, Research and Digital Transformation	Training and Skills Development of the Workforce	▪ 100% of employees to possess basic digital skills by 2030		2023	At least 42% of employees possess basic digital skills*	4 Quality Education; 8 Decent Work and Economic Growth; 9 Industry, Innovation and Infrastructure
			▪ Adoption of digital transformation tools, including cloud computing services and Artificial Intelligence (AI) *continuing operations		2022		
Optimization of Operations and Development of Innovative Products and Services	Innovation, Research and Digital Transformation	Fostering Innovation	▪ Exploration of strategic partnerships/investments for projects that promote innovation		Ongoing target		8 Decent Work and Economic Growth; 9 Industry, Innovation and Infrastructure

Short-term Targets: aligned with the reporting period used by the Company for its financial statements

Medium-term Targets: up to five years

Long-term Targets: more than five years.

Contribution of ELLAKTOR Group to the Sustainable Development Goals

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

The United Nations Sustainable Development Goals provide a holistic and integrated framework for addressing the most significant global sustainability challenges and creating a better future for all. While governments are primarily responsible for setting priorities and implementing actions that contribute to the achievement of the SDGs, their successful implementation also requires the active participation of businesses and civil society.

The Group is committed to contributing to the achievement of the Goals that are directly linked to its activities, the challenges arising from its operations, and the material sustainability matters identified through its business activities. In this context, in 2024, in collaboration with Wise Greece, the Group launched the "SDG Coffee Break" awareness programme on the 17 Sustainable Development Goals. Through this initiative, 592 hours of training were delivered to employees, with the participation of 248 employees across the Group.

Furthermore, the Group participated during 2023–2024 in a number of United Nations programmes, including the Business & Human Rights Accelerator, Peer Learning Groups on Gender Equality, Target Gender Equality, Climate Ambition Accelerator and SDG Ambition Accelerator. Through these initiatives, the Group further strengthened the knowledge and capabilities of its executives, supporting the development of appropriate tools and practices to enhance its contribution to the achievement of the Sustainable Development Goals.

The following section presents the Group's contribution to the Sustainable Development Goals and their associated targets.

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
1 NO POVERTY	TARGET 1·2 REDUCE POVERTY BY AT LEAST 50% TARGET 1·5 BUILD RESILIENCE TO ENVIRONMENTAL, ECONOMIC AND SOCIAL DISASTERS	▪ Creation of **decent jobs and working conditions.** ▪ Enhancing access to the labour market through education, offering young graduates **career development opportunities** and contributing to the strengthening and retention of human capital within the organisation. ▪ **Supporting vulnerable groups** by providing equal employment opportunities without discrimination. ▪ **Supporting and economically empowering vulnerable individuals and groups**.	▪ We provided direct employment to **1,585 people**. ▪ We provided access to the labour market for **10 young engineers** through vocational training and internship programmes, of whom 5**0% remained employed by the Group.** ▪ In 2024, **4 persons with disabilities** (PwDs) were employed by the Group. ▪ **760 kg of clothing** were collected and donated through Fabric Republic for distribution to charitable organisations.
2 ZERO HUNGER	TARGET 2·1 UNIVERSAL ACCESS TO SAFE AND NUTRITIOUS FOOD TARGET 2·2 END ALL FORMS OF MALNUTRITION	▪ **Supporting small-scale food producers**, aiming to increase their income and support vulnerable social groups. ▪ **Reducing food waste** through employee awareness and training initiatives, contributing to the reduction of hunger and malnutrition.	▪ We supported the **Hope Boxes** programme for three consecutive years through the non-profit initiative **Wise Greece**. In 2024, approximately **6 tonnes of food with high nutritional value** were distributed, benefiting **655 children**. ▪ We provided training to **113 employees** on food waste reduction in collaboration with **We4All**.

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
3 GOOD HEALTH AND WELL-BEING	TARGET 3.2 END ALL PREVENTABLE DEATHS UNDER 5 YEARS OF AGE TARGET 3.6 REDUCE ROAD INJURIES AND DEATHS TARGET 3.9 REDUCE ILLNESSES AND DEATH FROM HAZARDOUS CHEMICALS AND POLLUTION	▪ Contributing to the creation of safe and healthy conditions for employees as well as local communities. ▪ Supporting charitable and non-profit organisations, promoting solidarity and providing practical support to children and vulnerable social groups across Greece. ▪ The Group's companies implement certified Health and Safety Management Systems. ▪ Development of **awareness and educational programmes** for children and adults on **road safety issues.** ▪ Taking **preventive measures** in cases where potential risks are identified, aiming to eliminate accidents and health-related incidents. ▪ Contributing to the enhancement of **Health and Safety** through the proper use of chemicals and the continuous training of employees and contractors. ▪ Responding to the needs of the **National Health System (NHS)**, with the aim of supporting public healthcare services.	▪ We supported a number of organisations, including the **ELPIDA Association of Friends of Children with Cancer, Make-A-Wish Greece, the Annex for the Rehabilitation and Restoration of Children with Disabilities (former PIKPA) in Voula, the Hatzikyriakio Child Care Institution, The Children's Shelter**, and others. ▪ ATTIKI ODOS continued to implement **seven road safety and traffic awareness educational programmes.** More than **14,500 students** and over **4,700 adults** attended these programmes. ▪ We provided **130 employees** at the Group's headquarters with **First Aid training** (CPR and choking response techniques). ▪ We delivered **2,156 hours of Occupational Health and Safety training** to the Group's employees and contractors. ▪ We collected **422 units of blood**.
4 QUALITY EDUCATION ◢	TARGET 4.1 FREE PRIMARY AND SECONDARY EDUCATION TARGET 4.4 INCREASE THE NUMBER OF PEOPLE WITH RELEVANT SKILLS FOR FINANCIAL SUCCESS TARGET 4.7 EDUCATION FOR SUSTAINABLE DEVELOPMENT AND GLOBAL CITIZENSHIP	▪ Continuous enhancement of **employee training and development programmes**, either through internal training initiatives or in collaboration with external partners, aiming at continuous professional development. ▪ Participation in initiatives supporting **primary, secondary and tertiary education**, while promoting the inclusion of vulnerable groups. ▪ Internal communication and awareness-raising activities on sustainable development, encouraging employees' active participation and fostering a culture of responsibility and environmental awareness in the workplace. ▪ Delivery of **sustainability-related training programmes** for the Group's employees and the local communities in which it operates.	▪ **853 employees (54%)** of the Group received training. ▪ Employees participated in the **"ExcellenSeas"** programme, aimed at raising awareness of the need to preserve marine biodiversity. ▪ **11 courses** were developed and made available through the Group's e-learning platform. ▪ We implement a **monthly awareness tool** on sustainability topics to further enhance employee awareness. ▪ Continuous employee training on ESG and sustainability topics, with **639 hours of training** completed during 2024. ▪ We delivered **environmental awareness programmes in 40 schools** located in the areas where the Group operates, inW collaboration with the NGO **We4All.**

◢ It concerns priority goals for the Group

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
5 GENDER EQUALITY ◢	TARGET 5.1 END DISCRIMINATION AGAINST WOMEN AND GIRLS TARGET 5.2 END ALL VIOLENCE AGAINST AND EXPLOITATION OF WOMEN AND GIRLS TARGET 5.5 ENSURE FULL PARTICIPATION IN LEADERSHIP AND DECISION-MAKING TARGET 5.C ADOPT AND STRENGTHEN POLICIES AND ENFORCEABLE LEGISLATION FOR GENDER EQUALITY	▪ Implementation of **policies** aimed at creating a safe, inclusive and respectful working environment, free from discrimination and exclusion. ▪ Recognition of the **economic and social value of gender equality** and implementation of policies and practices that prevent gender-based discrimination in the workplace, the market and society. ▪ Supporting women's employment and promoting gender equality across all levels of the organisation and throughout the value chain.	▪ We implement a **Diversity, Equity and Inclusion Policy.** ▪ We implement a **Policy for the Prevention and Combating of Harassment and Violence at Work.** ▪ The Group has committed to the **Women's Empowerment Principles (WEPs)** of the United Nations. ▪ ELLAKTOR Group has signed the **Diversity Charter for Greek Companies**, integrating the principles of diversity and inclusion into its daily operations. ▪ **35% women** in the Group's workforce. ▪ **1st female CEO** within the Group, at REDS subsidiary. ▪ **56% women in C-level positions .**
6 CLEAN WATER AND SANITATION	TARGET 6.1 SAFE AND AFFORDABLE DRINKING WATER TARGET 6.3 IMPROVE WATER QUALITY, WASTEWATER TREATMENT AND SAFE REUSE TARGET 6.4 INCREASE WATER-USE EFFICIENCY AND ENSURE FRESHWATER SUPPLIES	▪ **Implementation of treated water reuse practices,** combined with the regular conduct of analyses to assess the quality of liquid waste generated by waste management facilities. ▪ **Monitoring and assessment of water use** and its impacts on water resources, as well as the implementation of procedures to improve local watershed conditions, mitigating impacts and supporting the **responsible management and use of water resources.**	▪ Through its leachate treatment facilities, **HELECTOR treated 453 thousand m³ of leachate** generated by its operations, **40% of which was reused.** ▪ Across the Group, **7% of the water withdrawn was directed to recycling or reuse.** ▪ In **100% of the Group's projects/activities**, we ensure **equitable access to sanitation facilities.** ▪ In **100% of the Group's projects/activities,** we ensure **access to safe and potable drinking water.**

◢ It concerns priority goals for the Group

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
7 AFFORDABLE AND CLEAN ENERGY ◢	TARGET 7.2 INCREASE GLOBAL PERCENTAGE OF RENEWABLE ENERGY	▪ **Contributing to climate change mitigation and promoting affordable and clean energy for all** through the generation of clean electricity from renewable energy sources.	▪ **221 GWh of clean electricity generated** from renewable energy sources (RES).
8 DECENT WORK AND ECONOMIC GROWTH ◢	TARGET 8.2 DIVERSIFY, INNOVATE AND UPGRADE FOR ECONOMIC PRODUCTIVITY TARGET 8.5 FULL EMPLOYMENT AND DECENT WORK WITH EQUAL PAY TARGET 8.6 PROMOTE YOUTH EMPLOYMENT, EDUCATION AND TRAINING TARGET 8.7 END MODERN SLAVERY, TRAFFICKING AND CHILD LABOUR TARGET 8.8 PROTECT LABOUR RIGHTS AND PROMOTE SAFE WORKING ENVIRONMENTS	▪ **Supporting the Greek economy and creating value,** part of which is distributed to society. ▪ **Creating local employment opportunities** for both low- and high-skilled workers, promoting full employment with competitive remuneration and equal opportunities for all employees, regardless of gender, age, nationality, beliefs or physical characteristics. ▪ Leveraging **student employment programmes,** providing training opportunities to participants and creating prospects for permanent employment for young graduates. ▪ Implementation of **Health and Safety Management Systems** across the Group's offices and project sites. ▪ **Reducing the gender pay gap**, reflecting the Group's commitment to equality and fair treatment and strengthening progress towards a more inclusive working environment.	▪ **€76 million in employee salaries and benefits.** ▪ We implement a **Human Rights Policy**, which prohibits all forms of forced labour and the employment of children below the minimum legal working age in the countries where we operate. ▪ We participate in **three research projects.** ▪ We delivered **2,107 hours of Occupational Health and Safety training** to the Group's employees and contractors. ▪ **10 students** participated in employment programmes. ▪ **In 100% of the Group's projects**, Health and Safety Management Systems were implemented. ▪ The **gender pay gap** at ELLAKTOR S.A. amounted to 7% in favour of men.

◢ It concerns priority goals for the Group

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
9 INDUSTRY, INNOVAT AND INFRASTRUCTURE	TARGET 9·1 DEVELOP SUSTAINABLE, RESILIENT AND INCLUSIVE INFRASTRUCTURES TARGET 9·5 ENHANCE RESEARCH AND UPGRADE INDUSTRIAL TECHNOLOGIES	▪ Developing infrastructure that contributes to sustainable development and the **empowerment of local communities.** ▪ Investing in the development of **modern technologies**, leveraging telecommunications, internet services, digital media and emerging technologies.	▪ We participate in **three research projects,** aimed both at optimising the Group's operations and modernising its projects. ▪ In **100% of the Group's concession projects**, infrastructure is **high-quality, reliable, sustainable and resilient,** focusing on affordable and equitable access.
10 REDUCED INEQUALITIES	TARGET 10·2 PROMOTE UNIVERSAL SOCIAL, ECONOMIC AND POLITICAL INCLUSION TARGET 10·3 ENSURE EQUAL OPPORTUNITIES AND END DISCRIMINATION	▪ Implementation of policies and adoption of international initiatives that promote **diversity, equity and inclusion**, embedding these values into the Group's day-to-day operations and fostering respect for diversity. ▪ Delivery of **training and awareness-raising initiatives** aimed at promoting awareness and responsible behaviour in the workplace. ▪ Participation of employees of nationalities other than that of their country of employment, fostering **intercultural collaboration and the exchange of experiences**, and contributing to a more open and diverse working environment	▪ Implementation of a **Diversity, Equity and Inclusion Policy.** ▪ The Group has committed to the **Women's Empowerment Principles (WEPs)** of the United Nations. ▪ ELLAKTOR Group has signed the **Diversity Charter for Greek Companies,** integrating the principles of diversity and inclusion into its daily operations and promoting the meaningful integration of people from diverse backgrounds within the workplace. ▪ Training on Unconscious Bias was delivered to **16 Group executives.** ▪ A training programme on the **prevention of violence and harassment in the workplace** was launched, with the participation of **91 employees.** ▪ **13%** of the Group's employees are of a **nationality different from that of the country** in which they are employed.

SUSTAINABLE DEVELOPMENT GOALS

11 SUSTAINABLE CITIES AND COMMUNITIES

SDG Targets Directly or Indirectly Related to the Group's Activities

- TARGET 11.2 — AFFORDABLE AND SUSTAINABLE TRANSPORT SYSTEMS
- TARGET 11.4 — PROTECT THE WORLD'S CULTURAL AND NATURAL HERITAGE
- TARGET 11.5 — REDUCE THE ADVERSE EFFECTS OF NATURAL DISASTERS
- TARGET 11.6 — REDUCE THE ENVIRONMENTAL IMPACT OF CITIES
- TARGET 11.7 — PROVIDE ACCESS TO SAFE AND INCLUSIVE GREEN AND PUBLIC SPACES

ELLAKTOR Group Contribution

- Contributing to the implementation and operation of projects that support the enhancement of citizens' well-being and the creation of a **more friendly and sustainable urban environment.**
- **Recognising the importance of historical and cultural heritage** and the opportunities provided by projects for the discovery of archaeological findings, and implementing procedures and measures, in accordance with applicable legislation, under the supervision of archaeologists and the competent archaeological authorities in cases where archaeological findings are identified.
- Leveraging the Group's expertise and resources to **strengthen cultural activities** (restoration/redevelopment and preservation of buildings of cultural and archaeological significance).
- **Analysis and assessment of potential risks** to the Group's operations and projects, and implementation of measures to limit risks, address emergency situations and ensure the smooth operation of cities.
- Promoting the development of **safe and resilient projects,** taking into account the impacts of climate change and potential natural disasters.

Results

- The assessment of climate-related risks and opportunities was completed in accordance with the TCFD framework, **contributing to enhancing the resilience of the Group, its activities and projects against the impacts of climate change.**
- In all Group projects involving excavations, and where archaeological findings are encountered, **the relevant national legislation and the approved Environmental Terms Approval Decisions (AEPOS) are applied.**
- At HELECTOR's waste-to-energy facilities, the production of biogas from landfill gas was used to generate **1,825,736 MMBtu** of energy, avoiding the release of methane into the atmosphere and significantly improving air quality.
- **862 thousand tonnes** of incoming waste were treated at HELECTOR's recovery facilities.
- **755 km** of motorways.
- At Alimos Marina, citizens have **free and unrestricted access** to recreational and hospitality areas.

◢ It concerns priority goals for the Group

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
12 RESPONSIBLE CONSUMPTION AND PRODUCTION ◢	TARGET 12·2 SUSTAINABLE MANAGEMENT AND USE OF NATURAL RESOURCES TARGET 12·4 RESPONSIBLE MANAGEMENT OF CHEMICALS AND WASTE TARGET 12·5 SUBSTANTIALLY REDUCE WASTE GENERATION TARGET 12·6 ENCOURAGE COMPANIES TO ADOPT SUSTAINABLE PRACTICES AND SUSTAINABILITY REPORTING	▪ Implementation of policies and **Environmental Management Systems** to ensure compliance with the legislative framework governing the management of chemicals, in accordance with Safety Data Sheets, as well as the management of waste in line with applicable environmental legislation. ▪ **Strengthening circular economy practices** through the Group's activities in the Environment sector, including waste valorisation, source separation and recycling of materials, the production of alternative fuels and the energy recovery of biogas. ▪ Publication of the **Sustainable Development Report** on an annual basis. ▪ Production of **compost products** through the Environment sector.	▪ We contributed to the avoidance of **1.076 thousand tonnes of CO_2 emissions** (third party). ▪ Production of **897 tonnes of compost products** through HELECTOR's operations. ▪ We managed **862 thousand tonnes of solid and 3.914 thousand m³ of liquid waste**, representing the total waste treated by the Group, thereby contributing to the circular economy and the protection of biodiversity.
13 CLIMATE ACTION ◢	TARGET 13·1 STRENGTHEN RESILIENCE AND ADAPTIVE CAPACITY TO CLIMATE RELATED DISASTERS TARGET 13·3 BUILD KNOWLEDGE AND CAPACITY TO MEET CLIMATE CHANGE	▪ Implementation of procedures to **reduce energy consumption from non-renewable sources** for the Group's operations. ▪ Ensuring the Group's **resilience to risks arising from climate change** through the establishment of strategy, taking into account **five different climate scenarios.** ▪ Commitment to **setting targets in line with the SBTi** and contributing to the reduction of greenhouse gas emissions and the mitigation of climate change. ▪ Implementation of **certified business continuity management systems**, strengthening the Group's preparedness and resilience to crises, while ensuring operational stability and the protection of stakeholders.	▪ **We reduced** Scope 1 and Scope 2 greenhouse gas emissions by 19% compared to 2023. ▪ **We completed the design of the Group's Roadmap towards Net Zero greenhouse gas emissions by 2050.** ▪ We **identified and assessed climate-related risks and opportunities,** as part of aligning with the recommendations of the **Task Force on Climate-related Financial Disclosures** (TCFD). ▪ We implement a certified Business Continuity Management System in accordance with **ISO 22301:2019**.

◢ It concerns priority goals for the Group

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
14 LIFE BELOW WATER	TARGET 14·1 REDUCE MARINE POLLUTION TARGET 14·2 PROTECT AND RESTORE ECOSYSTEMS	■ Taking all necessary **preventive and mitigation measures** across all projects to address any form of marine pollution. ■ Collaboration with NGOs and other organisations, supporting environmental initiatives aimed at cleaning the seabed and coastal areas, thereby contributing to the **protection of marine and coastal ecosystems.** ■ Conducting training and awareness-raising activities for the Group's employees aimed at **reducing plastic marine pollution.**	■ At Alimos Marina, **water quality within the tourist port was systematically monitored** throughout 2024 **by an independent body.** ■ ELLAKTOR Group, in collaboration with We4All and the Municipality of Alimos, carried out a **beach clean-up initiative** adjacent to Alimos Marina.
15 LIFE ON LAND	TARGET 15·1 CONSERVE AND RESTORE TERRESTRIAL AND FRESHWATER ECOSYSTEMS TARGET 15·2 END DEFORESTATION AND RESTORE DEGRADED FORESTS TARGET 15·4 ENSURE CONSERVATION OF MOUNTAIN ECOSYSTEMS TARGET 15·5 PROTECT BIODIVERSITY AND NATURAL HABITATS	■ Undertaking initiatives aimed at the **protection of biodiversity**, in compliance with legislation and environmental requirements, as well as implementing environmental management procedures in projects located in areas of high environmental value. ■ Taking into consideration the specific environmental requirements of projects neighbouring sensitive areas and **monitoring protected species** of flora and fauna.	■ We are a member of the **"Environmental Alliance"**, established by the non-profit environmental organisation **We4All.** ■ In the Group's concession projects, particular attention is given to the **protection of flora and fauna** along motorways.

SUSTAINABLE DEVELOPMENT GOALS	SDG Targets Directly or Indirectly Related to the Group's Activities	ELLAKTOR Group Contribution	Results
16 PEACE, JUSTICE AND STRONG INSTITUTIONS ◢	TARGET 16.1 REDUCE VIOLENCE EVERYWHERE TARGET 16.2 PROTECT CHILDREN FROM ABUSE, EXPLOITATION, TRAFFICKING AND VIOLENCE TARGET 16.5 SUBSTANTIALLY REDUCE CORRUPTION AND BRIBERY TARGET 16.7 ENSURE RESPONSIVE, INCLUSIVE AND REPRESENTATIVE DECISION-MAKING	▪ dentifying and taking action against **violence and corruption** across the Group's operations and value chain. ▪ Taking action against corruption and violence through the implementation of **whistleblowing and reporting policies**, as well as **anti-bribery and anti-corruption policies**, across the Group and its value chain.	▪ We implement an **Integrity Compliance Programme.** ▪ We implement a **Diversity, Equity and Inclusion Policy.** ▪ We implement a **Policy for the Prevention and Combating of Violence and Harassment at Work.** ▪ **Zero** confirmed incidents related to corruption and anti-competitive behaviour. ▪ **Zero** confirmed incidents of corruption. ▪ **Zero** confirmed incidents of bribery. ▪ **Zero** confirmed incidents of conflicts of interest.
17 PARTNERSHIPS FOR THE GOALS	TARGET 17.16 ENHANCE THE GLOBAL PARTNERSHIP FOR SUSTAINABLE DEVELOPMENT TARGET 17.17 ENCOURAGE EFFECTIVE PARTNERSHIPS	▪ Participation in strong global partnerships aimed at developing and promoting new and existing technologies, knowledge and business models for sustainable development	▪ We are an active member of **several organisations and networks** (SEV Council for Sustainable Development, CSR Hellas, UN Global Compact), with which we collaborate to support initiatives that promote the achievement of the Sustainable Development Goals.

◢ It concerns priority goals for the Group

Participation in Associations and Organisations

The Group and/or its companies participate in the following national and international associations, organisations and institutions, with the aim of supporting the development of the sectors in which they operate, continuously improving the services they provide, promoting the exchange of knowledge and best practices, and effectively managing the impacts arising from their operations. Further information on the organisations and associations in which the Group participates is provided in the Appendix.

- Hellenic Federation of Enterprises (SEV)
- SEV Council for Sustainable Development
- CSR Hellas
- United Nations Global Compact
- Global Compact Network Greece
- HELLASTRON – Hellenic Toll Road Network
- SEPAN – Hellenic Association of Recycling and Energy Recovery Industries
- ASEPPE – Panhellenic Association of Environmental Protection Enterprises
- American-Hellenic Chamber of Commerce

ESG Performance Assessed by External Rating Agencies

ELLAKTOR Group responds to sustainability analysts' questionnaires, and its ESG performance is assessed by independent organisations, including ISS ESG, Bloomberg, S&P Global, LSEG, Sustainable Fitch, FTSE Russell and Sustainalytics.

ESG PERFORMANCE

Rating Agency	ESG Rating 2024	ESG Rating 2023	Rating Scale (Low–High)
ISS Corporate Solutions	Environment: **1** Social: **1** Governance: **7**	Environment: **2** Social: **1** Governance: **6**	10 - 1
Bloomberg	**98.3**	**73.1**	0 - 100
LSEG Data & Analytics	**77**	**79**	0 - 100
Sustainalytics	**30.8**	**29.3**	100 - 0
S&P Global	**50**	**45**	0 - 100
FTSE Russell	**3.9**	**3.7**	0 - 5

The ratings presented in the table demonstrate an overall improvement and a positive trend in ELLAKTOR Group's ESG performance between 2023 and 2024.

Specifically, according to the assessment by ISS Corporate Solutions, the Group's Environmental rating improved from 2 in 2023 to 1 in 2024, indicating stronger environmental performance, while the Social rating remained stable at 1 for both years, reflecting the Group's consistently strong performance in social matters.

The Group also recorded a significant improvement in its Bloomberg ESG Score, which increased from 73.1 in 2023 to 98.3 in 2024 (on a scale of 0–100), demonstrating substantial progress in its ESG performance.

Similarly, the S&P Global ESG Score improved from 45 in 2023 to 50 in 2024 (on a scale of 0–100), reflecting the Group's continued efforts to strengthen its sustainability performance.

Overall, these results highlight the Group's commitment to the continuous enhancement of its ESG performance, transparency and responsible business practices.

Awards and Certifications

The Company is included in the ATHEX ESG Index of the Athens Stock Exchange. The index tracks the stock market performance of listed companies that adopt and publicly disclose their environmental, social and governance (ESG) practices. In 2024, the Group achieved an ESG Transparency Score of 98%, one of the highest scores among companies included in the ATHEX ESG Index, demonstrating its strong commitment to transparency and high-quality ESG disclosure.

The Group remained a constituent of the Financial Times Stock Exchange (FTSE4Good) Index Series.

For the second consecutive year, the Group submitted its Climate Change Questionnaire to the Carbon Disclosure Project (CDP) for assessment, covering 13 climate change disclosure areas, and achieved a B rating, outperforming the global average of C. This result reflects the Group's continued commitment to transparent climate-related disclosure and the effective management of climate-related risks and opportunities.

ELLAKTOR Group was ranked among the Top 100 companies in Greece and received the Platinum Distinction in the Forbes ESG Transparency Index. The rating reflects the level of ESG transparency demonstrated by the 100 largest companies in Greece, based on their 2021 reported turnover, assessing the extent and quality of their disclosures on environmental, social and governance (ESG) matters.

For the first time, ELLAKTOR Group was included in the national list of the "The 50 Most Sustainable Companies in Greece" for 2024, compiled by the QualityNet Foundation.

The Group achieved an Overall A Score on the Synesgy platform for 2024, following an assessment based on internationally recognised Environmental, Social and Governance (ESG) standards. This distinction places the Group among the leading companies in ESG performance, reaffirming its long-standing commitment to sustainable development and responsible business conduct.

To ensure transparency across all its activities and enhance operational effectiveness, ELLAKTOR Group has developed and implemented management systems certified in accordance with internationally recognised standards. These systems support compliance with applicable legislation while promoting the Group's continuous improvement, operational reliability and long-term sustainability. They also contribute to safer working conditions, environmental protection, improved productivity and responsible business practices.

The Group's companies have developed and maintain certified management systems, including:

- ISO 9001 - Quality Management Systems
- ISO 45001 - Occupational Health and Safety Management Systems
- ISO 14001 - Environmental Management Systems
- ISO 50001 - Energy Management Systems
- ISO 39001 - Road Traffic Safety Management Systems
- ISO 37000 - Guidance for the 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 - Information Technology Service Management Systems

Disclosures under the EU Taxonomy Regulation

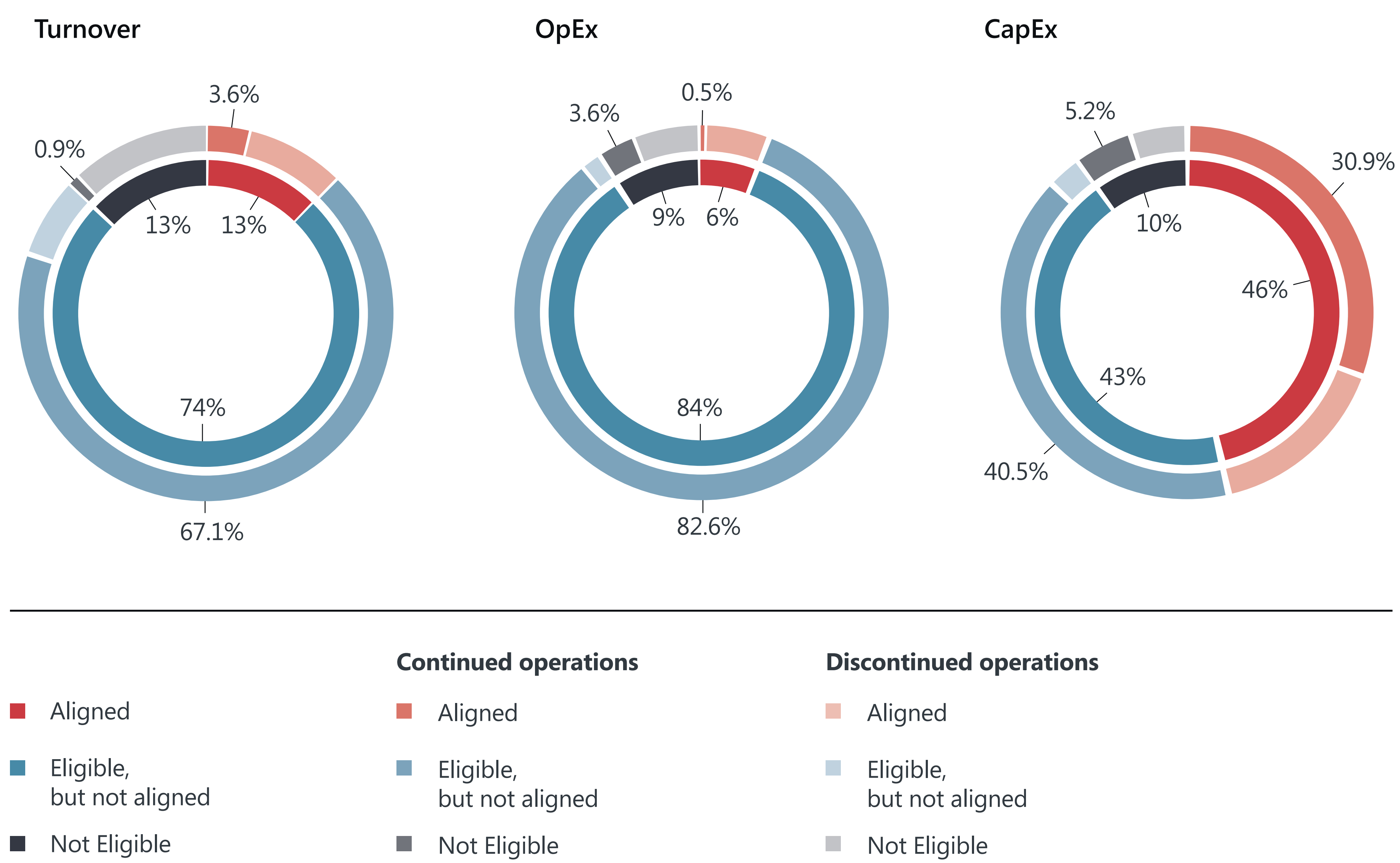
The European Union established the EU Taxonomy Regulation (Regulation (EU) 2020/852) to create a common classification system for environmentally sustainable economic activities. The Regulation provides a framework for assessing a broad range of economic activities based on their environmental performance, with the objective of mobilising sustainable investment and supporting the transition to a climate-neutral economy in the European Union by 2050, in line with the European Green Deal.

For the fourth consecutive year, ELLAKTOR Group carried out an assessment in accordance with the EU Taxonomy Regulation to identify its environmentally sustainable economic activities and evaluate the related financial performance against the Regulation's technical screening criteria. As part of this assessment, available technical information, estimates and existing evaluations covering the full life cycle of the products and services provided across the Group's subsidiaries and business activities were taken into consideration.

The 33 economic activities assessed were evaluated against the Technical Screening Criteria and the Do No Significant Harm (DNSH) criteria. Of these, 16 activities were determined to be Taxonomy-aligned, falling within seven (7) economic activities defined under the EU Taxonomy.

For further information on the results of the EU Taxonomy assessment for the 2024 financial year, please refer to Section B.4.2.1 "Disclosures Required under the EU Taxonomy Regulation" of the 2024 Sustainability Statement.

EU Taxonomy Eligibility and Alignment Assessment Results – 2024



Environment

Alignment with the Sustainable Development Goals

Alignment with the Principles of the United Nations Global Compact

MAIN ACHIEVEMENTS

Completion of a Roadmap towards zero greenhouse gas emissions by 2050

Achieving a high B score for the second year, by the independent certification body (CDP) on climate change

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

OUR PERFORMANCE

221 GWh
energy production from RES

1,076 tonnes
of third parties CO_2 eq. emissions prevented

19%
reduction in Scope 1&2 emissions compared to 2023

862 th. tonnes
of solid waste input from third parties to be managed in the treatment plants

99%
waste diverted from disposal from Group's operations

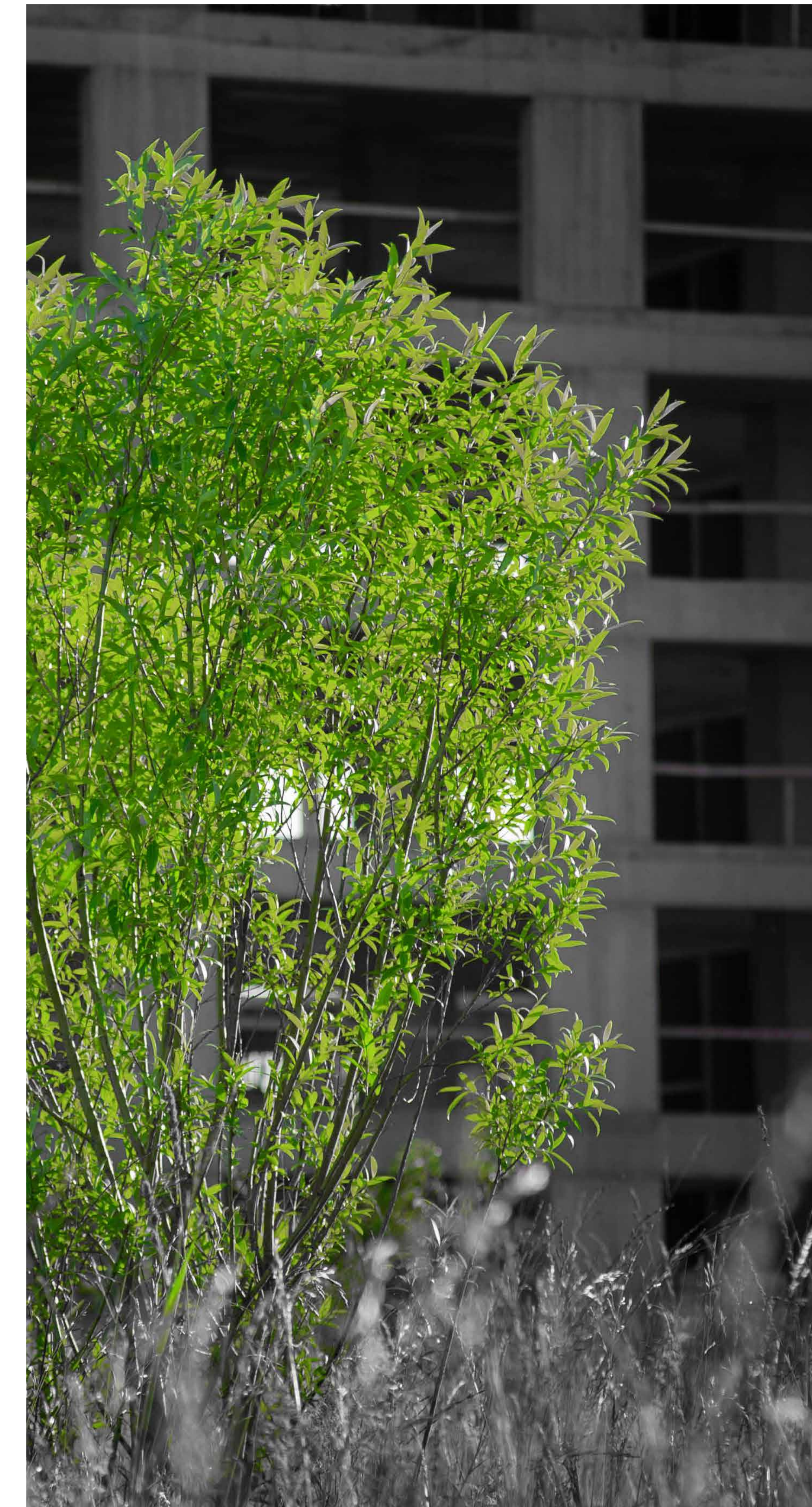
€1,085,218
expenditure on environmental protection

Environmental Management

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

With the aim of not only mitigating its environmental impact, but also enhancing the Group's positive impact on the environment, its main commitments and priorities in all its activities are:

- environmental protection
- pollution prevention
- achievement of zero greenhouse gas emission
- promotion of the circular economy
- climate change mitigation and adaptation
- conservation and protection of biodiversity and ecosystems
- responsible management of waste and raw materials



Environment & Energy Policy

The Group has adopted and implements [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 climate change and the circular economy as the main strategic pillars. The main commitments of the Group's Management are the protection of the environment, including the prevention of pollution, ensuring the provision of the required information and resources to achieve the objectives of the implemented Environmental & Energy Management Systems, the consultation and open dialogue with stakeholders on environmental and energy issues and the continuous improvement of the Group's environmental and energy performance.

The Group is committed to reduce the environmental impact of its activity and mitigating environmental risks through its policy on various issues. To this end, it develops action plans and incorporates relevant objectives into its strategy. More information on these commitments can be found at [Annual Financial Report 2024](), under 'B.4.2 Environmental Information'.

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

Action plan

- Total Scope 1, 2 and 3 emissions capture
- Implementation of energy consumption monitoring system
- Preparation of a study and start of implementation of a roadmap to zero greenhouse gas emissions by 2050
- Design of a Roadmap and Climate Risk Response Plan (TCFD)
- Adoption and implementation of vehicle fleet renewal and replacement policy (in progress)
- Investigation and utilization of RES projects to cover the Group's electricity consumption, such as installation and operation of PVs in existing and new projects with net metering or in Virtual Net Billing (VNB) regime, depending on the project
- Replacement of conventional lighting fixtures with LED lighting across project sites and office facilities
- Evaluation of business partners with environmental criteria
- Support and training of local suppliers to reduce their emissions (under planning)
- Exploration of the supply of green energy through Bilateral Power Purchase Agreements (PPAs)
- Design and development of an efficient water use management system in accordance with the requirements of ISO 46001:2019
- Training and Information to the Local Community on biodiversity issues

Under planning
In progress
Completed

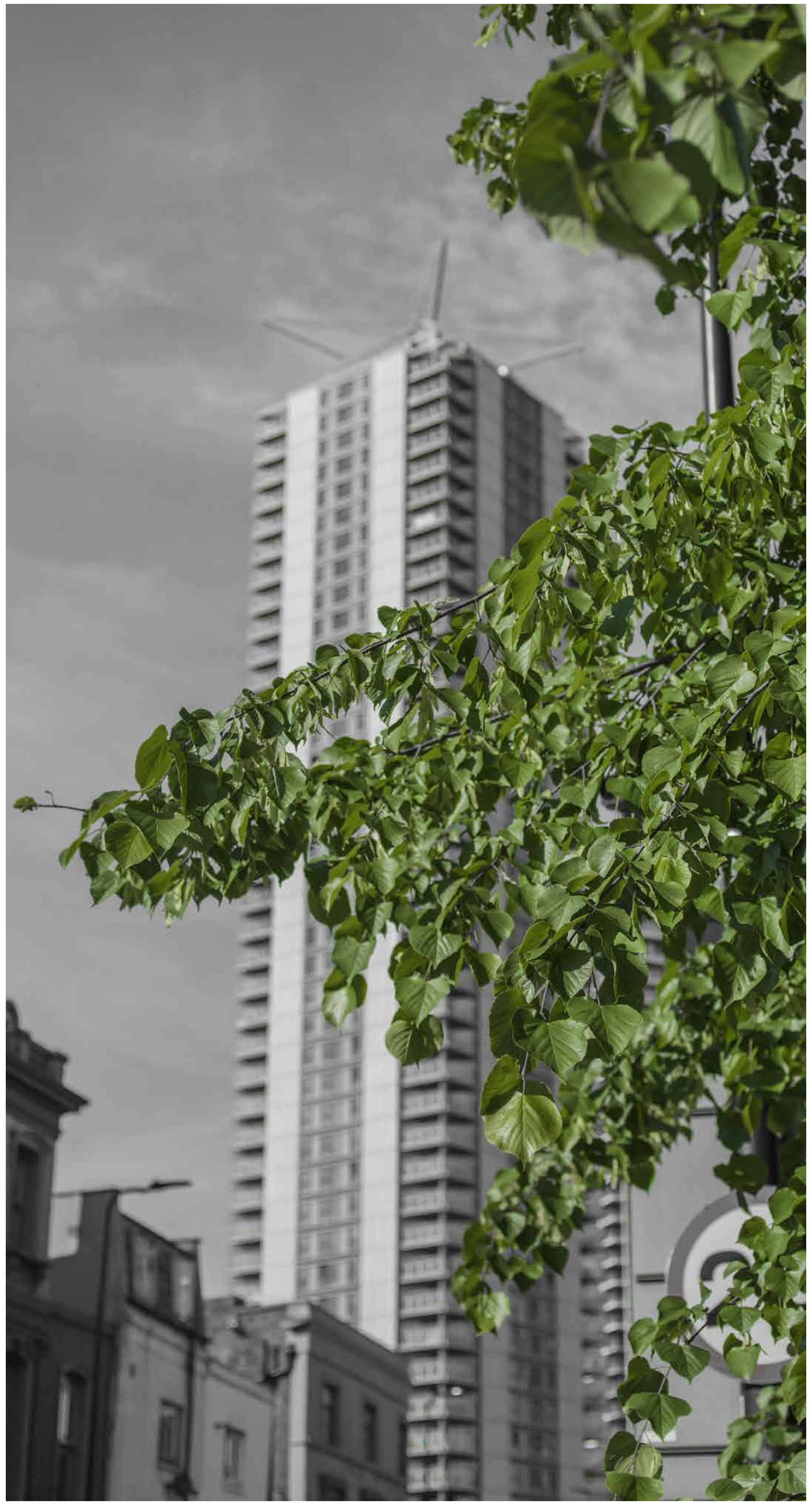
Environmental and Energy Management System

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 sectors of activity implement certified Environmental Management Systems according to ISO 14001: 2015 (83% of projects based on turnover), through which the reduction of the impact of their activity on the environment is achieved and they 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 certified Environmental Management Systems, environmental and energy performance indicators are systematically recorded and monitored in order to assess performance and identify opportunities for improvement, while also capturing and integrating the needs and expectations of stakeholders. At the same time, employee awareness of environmental and energy issues is promoted, ensuring the harmonious integration of business activities within the wider natural and built environment.

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



Organizational Structure

The Sustainable Development Committee oversees all action plans on ESG issues, in particular on environmental and energy issues, and monitors the Group's environmental performance with the aim of continuous improvement.

The Group's ESG Strategy & Sustainability Division, reports to the Group's Strategic Development Division, makes recommendations to the Sustainable Development Committee on environmental issues and 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 strengthening of the environmental awareness of its employees Group and its business partners.

The Group's main companies have an Environmental & Energy Management Department, which functionally reports to the Group's ESG Strategy & Sustainability Division and is responsible for ensuring the proper observance 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 respective project manager and is guided and supported by the Environmental & Energy Management Department of each subsidiary.

Compliance with legal and other requirement

The Group's projects, where required by legislation, have an approved Environmental Impact Study and approved environmental terms or standard environmental commitments. In addition, depending on the project, additional conditions are set by the Developer 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 Awareness

The Group is committed to providing the necessary resources so that all its employees can participate in training activities on environmental and energy issues. All Group employees receive induction environmental and energy 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, on issues such as climate change, biodiversity protection and conservation, food waste, microplastics, with the aim of developing an environmentally responsible corporate culture. It is worth mentioning that on World Environment Day 2024, a special training action was organized as part of the «SDGs Coffee Breaks» program, to inform and raise awareness amo -profit movement Wise Greece. In addition, environmental educational activities are organized for the Group's business partners.

Communication and consultation

The ESG Strategy & Sustainability 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, systematically hold meetings with the Environment & Energy Managers 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 stakeholder. 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 and assessment of environmental aspects and impacts

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 of dealing with them, stakeholders). This process identifies relevant risks and opportunities for improvement and plans actions to mitigate environmental impacts.

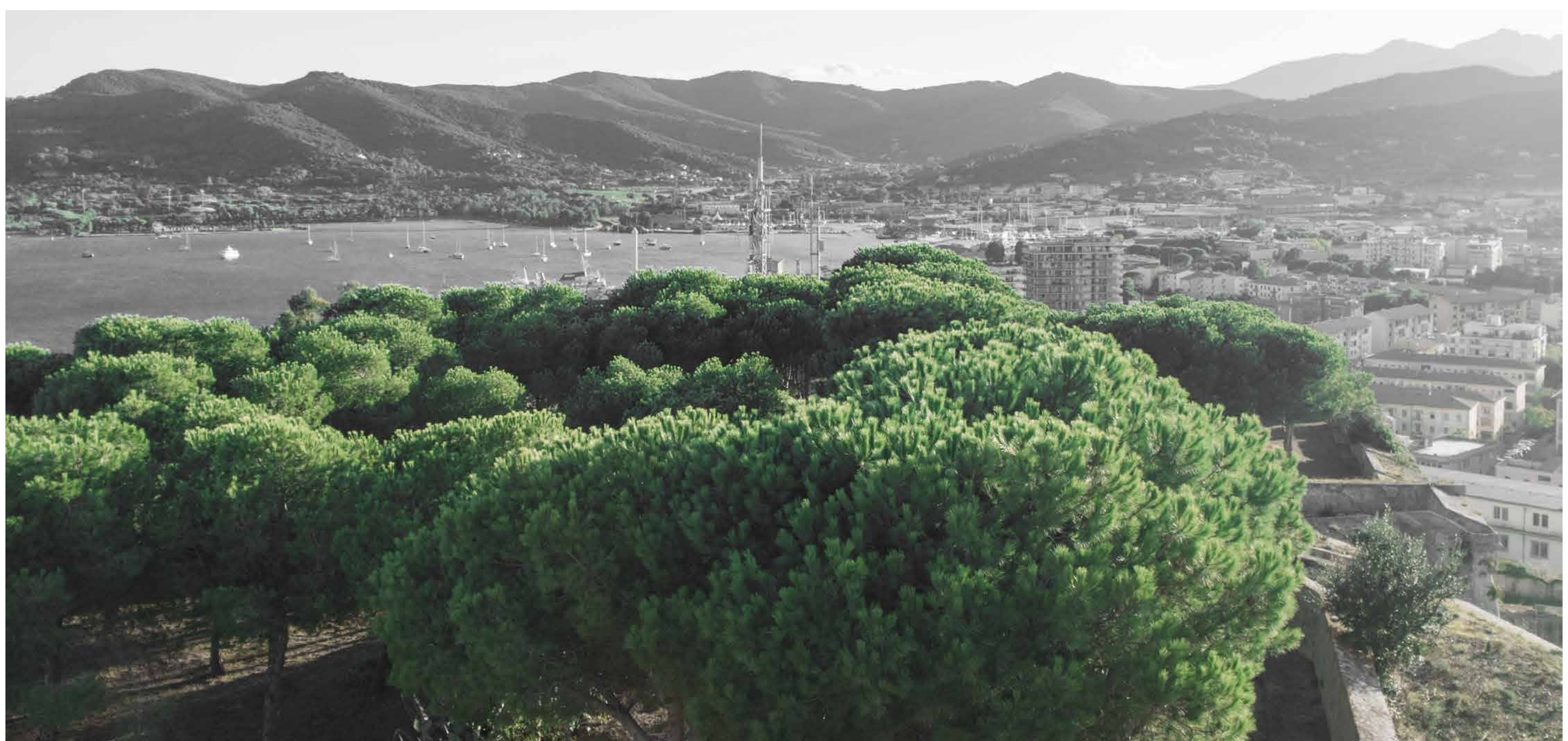
Indicatively, the Group's projects have been identified as having direct environmental aspects related to its operation, such as the consumption of resources (energy, water and materials/materials), greenhouse gas emissions, the production of solid non-hazardous and hazardous waste, the losses of refrigerants from the use of air conditioning, the production of wastewater, the possible impact on land and water recipients, the possible impact on biodiversity and ecosystems in the areas of activity and the environmental nuisance to the local community. At the same time, indirect environmental aspects are recognized, such as, indicatively, the selection of suppliers, the supply of raw materials and the environmental performance of its business partners.

Recording and assessment of environmental risks

The Group identifies and assesses the main risks and threats to the environment. Indicatively, the most important risks that have been identified are those related to climate change, the possibility of non-timely compliance with environmental legislation or with the environmental licensing of a project, any pollution incidents in a water recipient, air emissions or dust beyond 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 nuisance to the local community, such as noise and vibrations above the limits, the possible reduction of the green balance, the possible disruption of biodiversity, any complaints from stakeholders, the risks related to ensuring business continuity and preparedness to deal with 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 performance in environmental matters, not only directly when they are active in the Group's projects, but also indirectly by affecting issues such as other indirect emissions (Scope 3).

In particular, for the identification of the risks of climate change you can refer to the section "Climate Risks and Potential Financial Impacts Identification and Assessment (TCFD)".



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 and deter 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 generated by the Group's activities is managed with specific procedures from the collection, storage, possible processing, transport to final disposal to a licensed and registered in the Electronic Waste Register (EWC) receiver.

Waste management is carried out according to the waste hierarchy, prioritizing prevention, reuse, recycling, and sorting at source. Special care is given to the storage of hazardous waste where all legal requirements for the protection of the soil and subsoil from any leaks are met.

Waste management contractors are assessed with regard to the validity of their permits and all supporting documentation evidencing their legal compliance is collected and maintained. In addition, the Group's projects maintain cooperation with specialized bodies and alternative management systems for the separate collection of hazardous waste of special streams (indicatively: waste oils, used accumulators, batteries and light bulbs) and their environmentally sound 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 wastewater that may be generated is treated and, where possible, reused and disposed of to licensed recipients.

Environmental Management Plan

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

Contingency 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 to incidents, 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

Group 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 2024, 22 external audits were carried out by external bodies (competent authorities, certification bodies) on the Group's projects. In addition, for compliance with environmental legislation, environmental conditions and internal procedures, an internal environmental audit program was implemented in 2024, with 64 internal audits carried out by the team of internal auditors and 71% of active projects were inspected compared to 53% in 2023. A total of 41 deviations were identified and recorded through internal and external audits, and corresponding corrective actions were planned for their resolution, achieving a closure rate of 50%.

Monitoring and evaluation of environmental and energy indicators

The Group records and monitors environmental performance indicators which are listed below and sets targets for their continuous improvement. For the monitoring of the indicators, a specific procedure is followed for the collection, processing and control of the data which are completed at project level by the respective Environment & Energy Officer. In 2024, a new electronic platform for the collection and control of environmental data was designed and implemented. In the projects and depending on the requirements of the environmental terms, measurements are carried out to check compliance with any limits on environmental parameters that have been established.

Review by the Management

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

€1,085,218

expenditure on environmental protection projects (infrastructure for waste management, environmental impact studies and measurements of environmental parameters).

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.

ELLAKTOR Group is committed to a sustainable future and actively works to recognize the risks and opportunities of climate change and adapt to its impacts and reduce its carbon footprint. In this context, it has adopted a climate transition plan in line with the goal of the Paris Agreement to limit global warming to 1.5°C. However, the transition away from fossil fuels is a complex process that requires careful planning and significant investment.

It is worth mentioning that the Group proceeded for the second time to submit a report for evaluation to the independent certification body (CDP) on climate change and scored a high score of B.

Climate Risk and Potential Financial Impacts Identification and Assessement (TCFD)

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 has designed a climate change mitigation and adaptation action plan which is presented in the [Annual Financial Report 2024] under 'Actions and resources related to climate change policies [E1-3]'.

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

For more information on the results of the TCFD report, please refer to the section "Material impacts, risks and opportunities and their interaction with the strategy and business model [SBM-3]" and for climate change adaptation actions in the section "Actions and resources in relation to climate change policies [E1-3]" of [Annual Financial Report 2024].

Energy Production From Renewable Sources

The Group has in its portfolio projects that produce energy only from Renewable Energy Sources, making this electricity available in the country's grid, contributing to the improvement of the energy mix. A small part of this energy produced is self-consumed within these projects. These projects include biogas recovery plants, photovoltaic parks, wind farms and a biomass recovery plant. In total, the Group's companies operate 12 RES projects with a total capacity of 47.3 MW.

More specifically, through the design, development and operation of biogas recovery plants, ELLAKTOR Group contributes to climate change mitigation by utilizing the methane released from landfills, which is the gas with the second largest potential to contribute to climate change. In this way, electricity is produced, which is delivered to the grid by improving the country's energy mix, resulting in an improvement in the quality of the atmosphere near the projects and overall the positive impact of these projects is much greater compared to their carbon footprint.

The portfolio of the Environment Segment includes the energy utilization of the biogas produced from landfills, with the aim of converting it into electricity. In 2024, the energy produced amounted to 197 GWh, which was provided to the grid.

HELECTOR, utilizing its extensive know-how in this field, operates four biogas power plants at the landfills of Ano Liosia, Tagarades, Mavrorachi and Kozani, with a total installed capacity of 32.8 MW. It is worth mentioning that the Power Plant at the Fyli landfill in Ano Liosia, with a capacity of 24.2 MW, which was designed, built and operated by the Group, ranks among the largest in the world.

In addition, the portfolio of the Environment Segment also includes a biomass plant, with an installed capacity of 1.2 MW, which was not put into operation in 2024.

Through the net production of 221 GWh of electricity from RES in 2024, it is estimated that the Group contributed to the prevention of emissions of 1,076 thousand tonnes of CO_2 eq.* into the atmosphere. It is noted that the energy consumption within the organization for the operation of the Group was 639 GWh.

Group RES Projects 2024

3
wind farms

7.8 MW
installed power

18.8 GWh
net energy produced

4
utilization units biogas

32.8 MW
installed power

197 GWh
energy produced

4
photovoltaic parks

5.5 MW
installed power

5.2 GWh
energy produced

Energy Production from RES

221 GWh net generated energy

Contribution to the prevention of emissions **of 1,076 th. tonnes** CO_2 eq. (third parties)*

Λειτουργία Ομίλου ΕΛΛΑΚΤΩΡ

639 GWh energy consumption

37,873 tonnes of CO_2 eq. emissions into the atmosphere

*For the calculation, the CO_2 factor included in the Report of the Energy Mix of Production of the Country for 2023 (ENERGY MIX 2023, DAPEEP) has been used. For the calculation of CH4 emissions, the relevant factors from the DAPEEP Report for the year 2023, the National Greenhouse Gas Emissions Inventory Report 2023 and the CRF tables, 2023 have been used. The amount of methane that is driven for combustion in biogas plants and is not released into the atmosphere has also been calculated.
** Scope 1&2 Greenhouse Gas Emissions (GHGs) are included. Scope 1 direct emissions do not include biogenic CO_2 emissions, which, according to the GHG Protocol, are reported separately. The value is reported using the location-based method.

In addition to biogas recovery 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 at the composting facilities (EMAK Ano Liosia and the Kozani Mechanical Biological Treatment Plant (MBT)) provides a sustainable soil amendment solution, improving soil health and helping mitigate the impacts of climate change. Compost enhances soil structure, increases its water retention capacity, and improves its organic matter content. At the Ano Liosia Mechanical Recycling Plant (EMAK), 897 tonnes of high-quality compost derived from bio-organic waste were produced.

HELECTOR facilities also produce alternative fuel (RDF/SRF) from waste, which has a calorific value, provides an energy benefit and contributes positively to the reduction of the amount of waste that ends up in landfills. In 2024, 843 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 3,137 tonnes.

The percentage of the Group's activity related to the production of low-carbon products amounts to 6% of the total turnover for 2024, recording an increase compared to 2023, where the percentage was 5%.

Energy Consumption

In all the Group's activities, a single energy management is applied 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 at the headquarters. For more efficient energy management, companies in Group projects* apply certified Energy Management Systems, in accordance with the ISO 50001:2018 standard (82% of projects based on turnover).

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.

For more details you can refer to the Annex

In 2024, the Group's total energy consumption amounted to 639,474 MWh (2,302 TJ) and is analyzed in the following graph.

The largest percentage of energy consumed came from the combustion of biogas from landfills for electricity production (82.8%), while the remaining amount came from electricity consumption from the grid (11.4%), from fuel consumption (5.4%), and from self-consumption of energy within projects from RES (0.4%).

Energy Consumption (MWh)

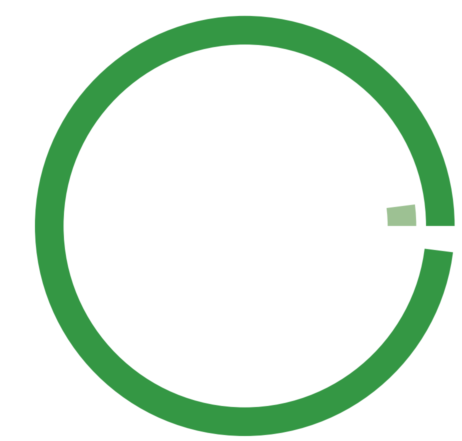
Total
639,474 MWh

- Renewable fuel consumption* **529,463** - 82.8%
- Electricity consumption, purchased or obtained from renewable sources** **37,193** - 5.8%
- Consumption of electricity, purchased or obtained from fossil sources** **35,964** - 5.6%
- Fuel consumption from crude oil and petroleum products **26,078** - 4.1%
- Natural Gas fuel consumption **8,194** - 1.3%
- Consumption of self-generated energy from renewable sources other than fuel **2,582** - 0.4%

**It is noted that self-consumption in biogas exploitation projects has been accounted for in fuel consumption and not in self-generated energy consumption*
***Electricity from the grid*

The percentage of energy consumed and derived from renewable sources was 83%, mainly from self-consumption of electricity in Greece (99.9%) and a minimal amount of wood pellets abroad (<0.005%).

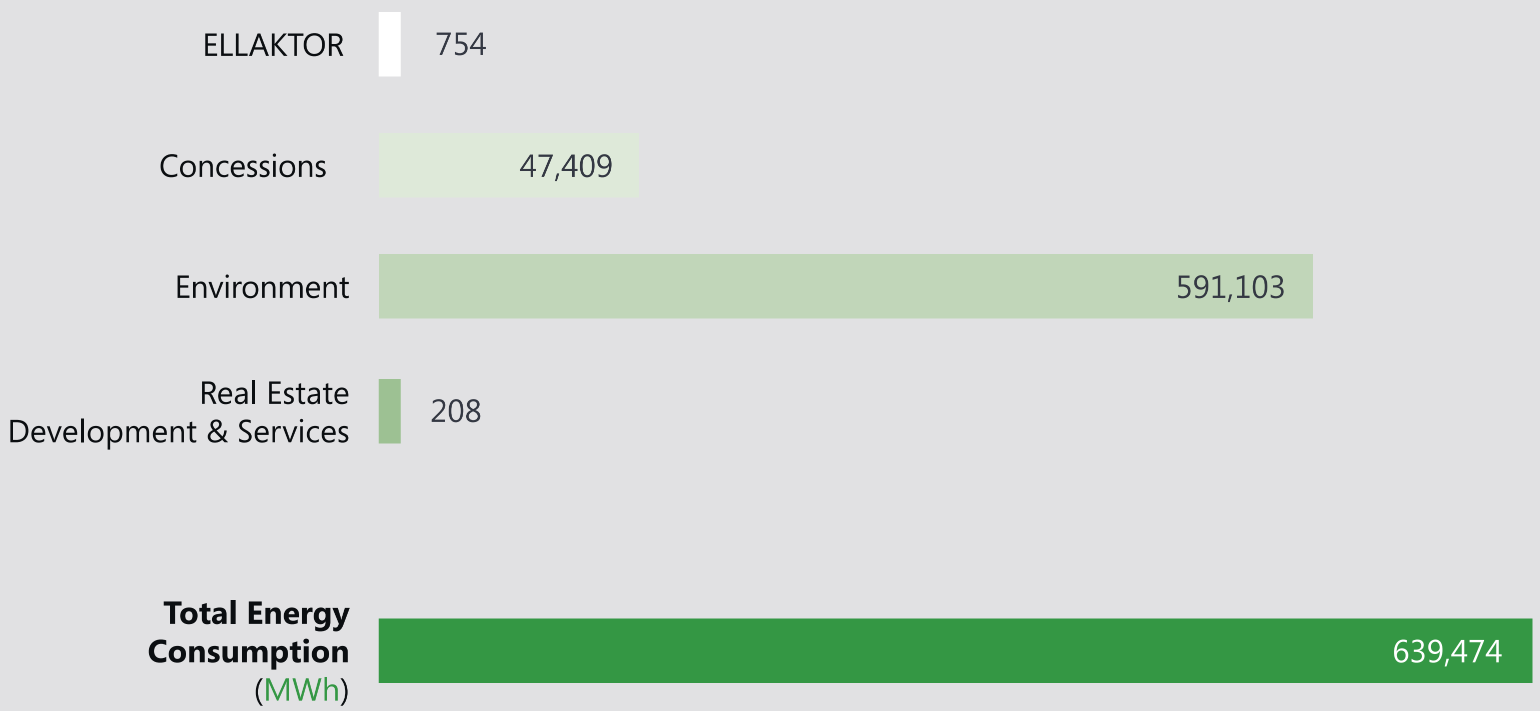
Total Energy Consumption by Country (MWh)



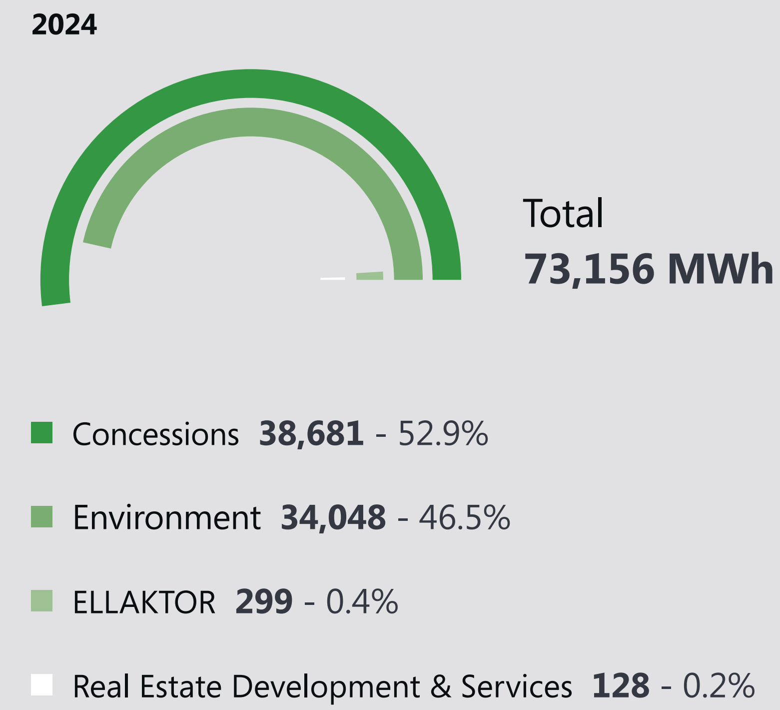
Total
639,474 MWh

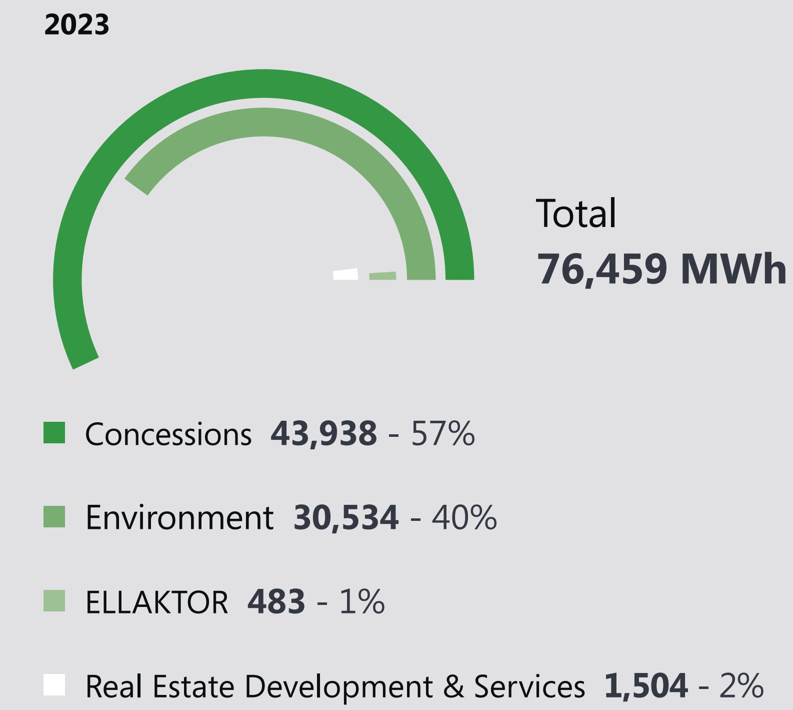
- Greece **624,207** - 98%
- Abroad **15,267** - 2%

Energy consumption by segment 2024 (MWh)

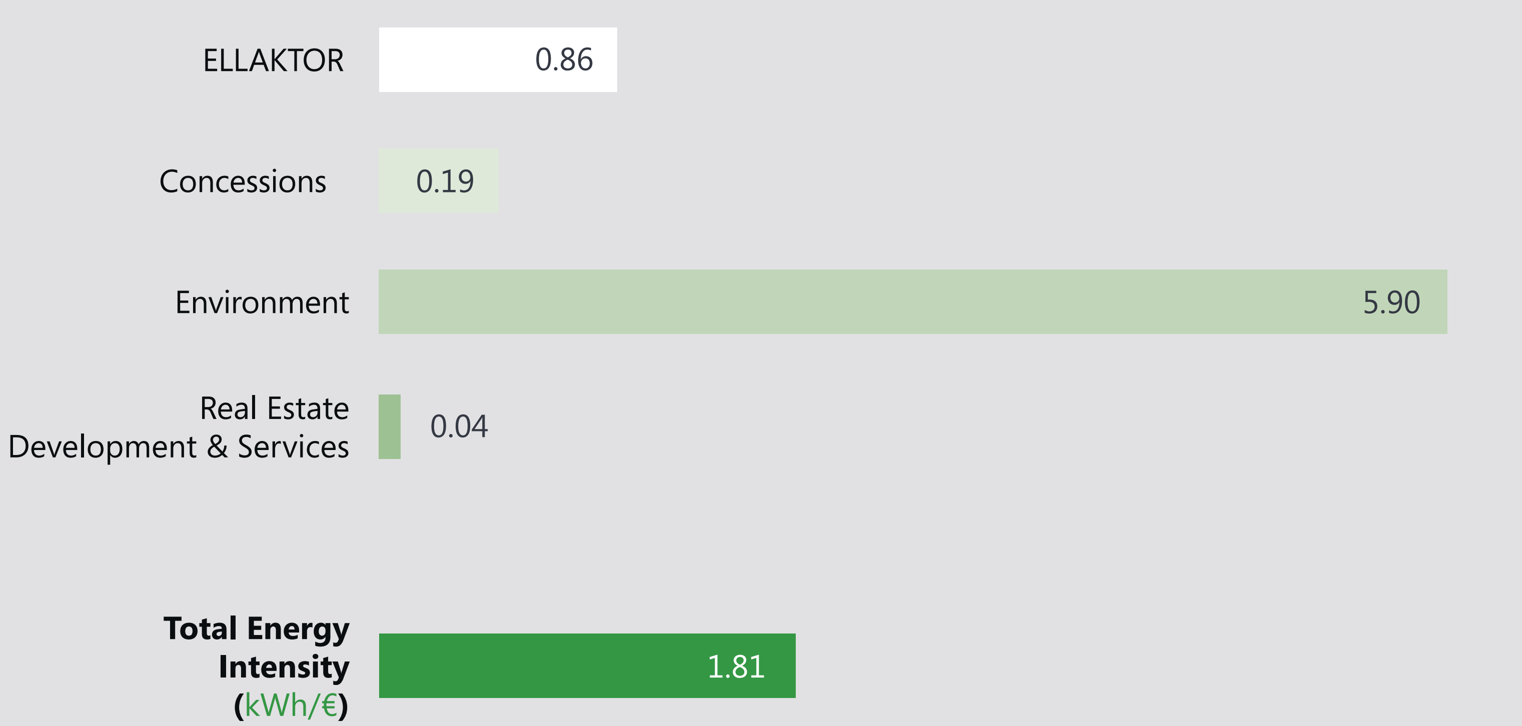


Electricity consumption from the grid by segment (MWh)

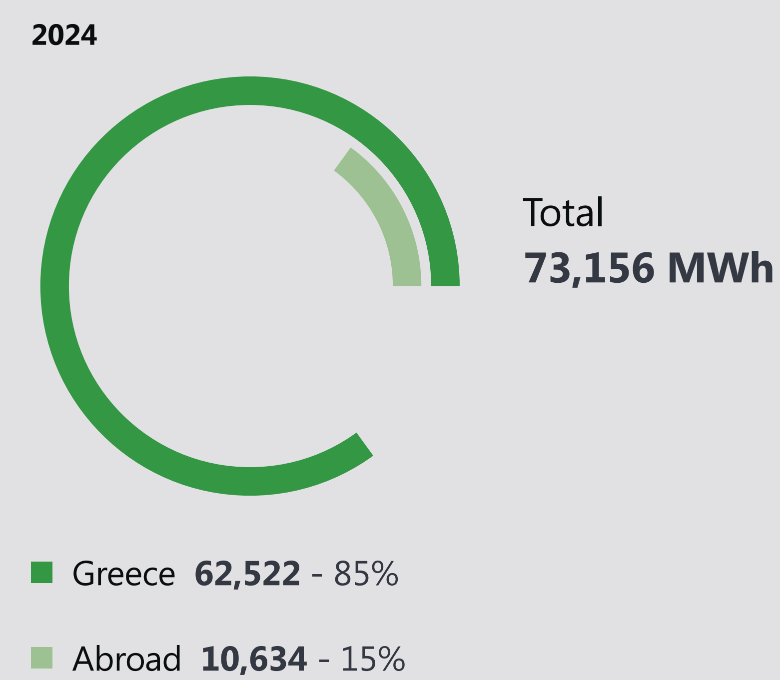


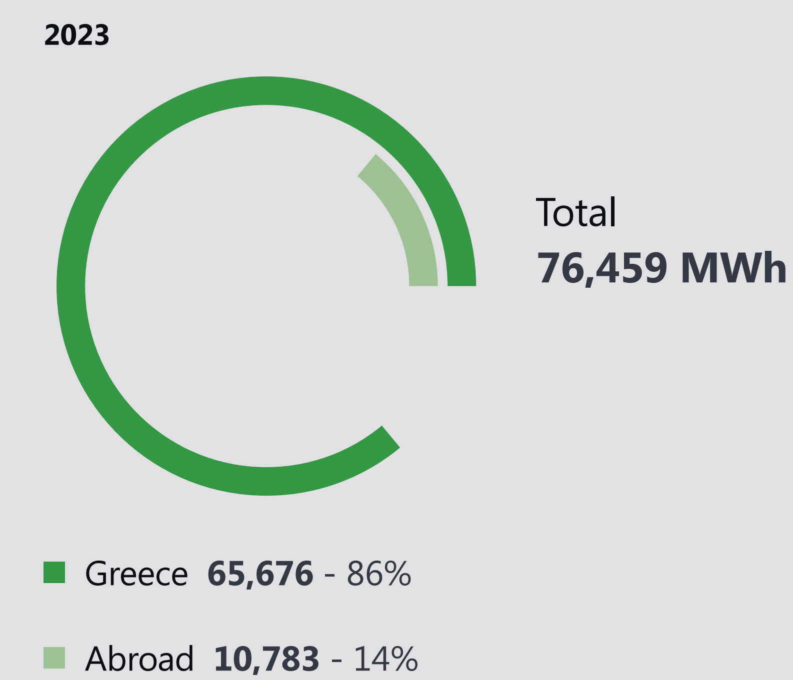


Energy consumption intensity by segment 2024 (kWh/€)

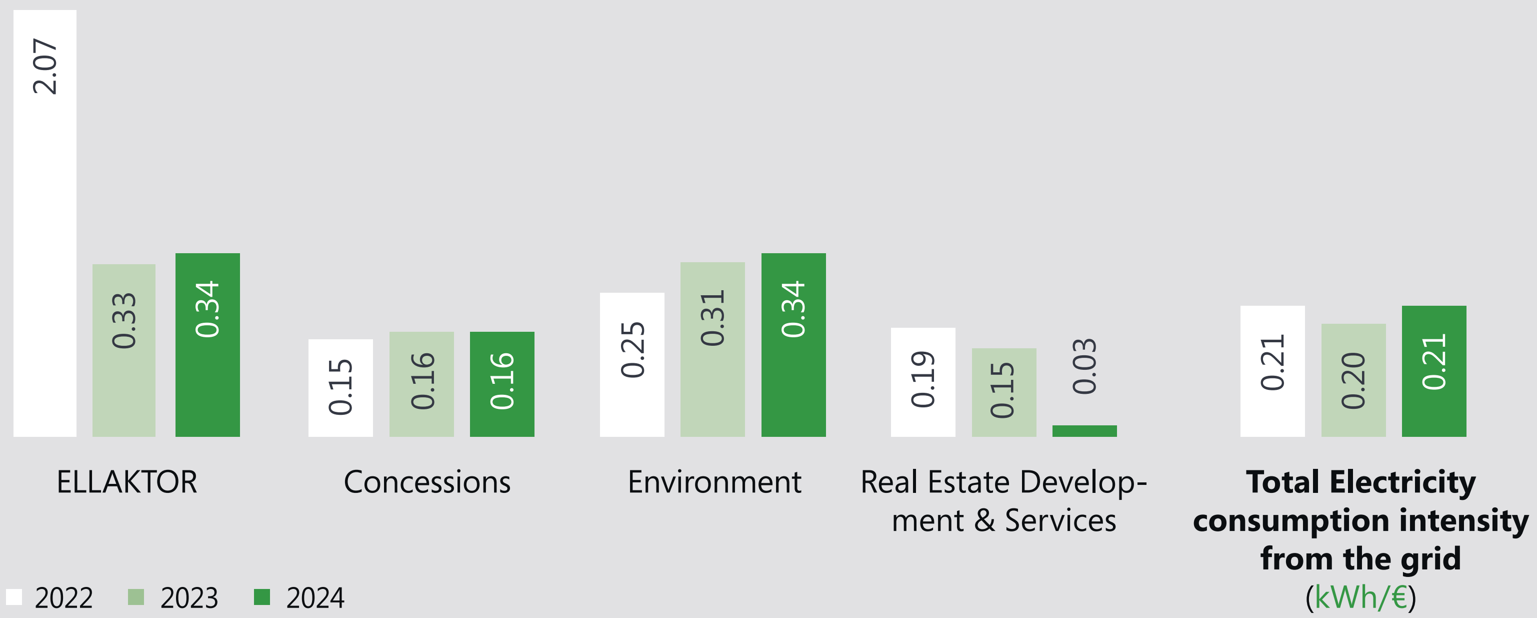


Electricity consumption from the grid by country (MWh)





Electricity consumption intensity from the grid (kWh/€)



Having set the targetl of reducing greenhouse gas emissions and energy consumption and taking into account the Group's Environment & Energy Policy for climate change mitigation, the Group's projects are implementing a series of actions in this direction from 2022 and with a time horizon of 2030 to achieve the first level of the targets set.

More specifically, for 2024, the Group's projects and activities implemented climate change mitigation initiatives with an estimated energy savings of 2,163 MWh, compared to 3,678 MWh in 2023 and cost savings of €27,411 per year, for which €1,701,711 was spent. These actions led to the avoidance of 548 tonnes of CO_2 eq. In addition, the actions planned in the Group's projects and activities to reduce electricity are estimated at energy savings of 84.5 MWh, and cost savings of €21,100 per year, for which it is estimated that €248,825 will be spent. These actions are estimated to lead to the prevention of 21 tonnes of CO_2 eq.

In more detail, the actions implemented by segment of activity to mitigate climate change and reduce energy consumption from non-renewable sources are analyzed in the section « Actions and resources in relation to climate change policies [E1-3]» of Annual Financial Report 2024.

Greenhouse Gas Emissions (GHGs)

ELLAKTOR Group is committed to a sustainable future and is actively working to reduce its carbon footprint by adopting a climate transition plan in line with the goal of the Paris Agreement to limit global warming to 1.5°C. However, the transition away from fossil fuels is a complex process that requires careful planning and significant investments.

The Group, in the context of the transition to a climate-neutral future, has set, with a base year of 2023, for all its activities, a target of reducing Scope 1&2 emissions by 42% by 2030 and indirect Scope 3 emissions by 25% by 2030. The progress achieved for GHG scope 1&2 emissions is 44% while for Scope 3 emissions it is 70%. These targets have been set using the Absolute Contraction Approach (ACA), SBTi's 'Corporate Near-Term Target setting tool'. According to the SBTi criteria (SBTi CORPORATE NEAR-TERM CRITERIA Version 5.2 March 2024), the target of 42% of Scope 1&2 emissions by 2030 is in line with the 1.5ºC scenario while the target of 25% of Scope 3 indirect emissions by 2030 is in line with the WB2C (Well-below 2°C) scenario.

To achieve the above targets, the Group has developed a Climate Transition Plan, which focuses on integrating climate risk management into its operations and investing in sustainable practices and technologies. Further information is provided in the section "Transition plan for climate change mitigation [E1-1]"of the Annual Financial Report 2024.

Direct and indirect greenhouse gas emissions (GHG Scope 1&2)

In 2024, Scope 1 direct emissions (GHG) amount to 15,818 t CO_2 eq.*, account for 42% of Scope 1&2 emissions and relate to (i) emissions from fuel combustion in stationary equipment (18%**) and mobile combustion (39%**), (ii) fugitive emissions from refrigeration / air conditioning equipment in office buildings and facilities (3%**) and (iii) emissions from the release of GHG from physicochemical processes, and specifically from waste management within projects (40%**). The Group's Scope 2 indirect emissions (GHG) constitute 58% of Scope 1&2 emissions and amount to 22,055 t CO_2 eq. (according to the location-based method) and derives from the consumption of electricity from the grid. With the market-based methodology, emissions amount to 29,057 t CO_2eq. according to the emission factors of each provider.

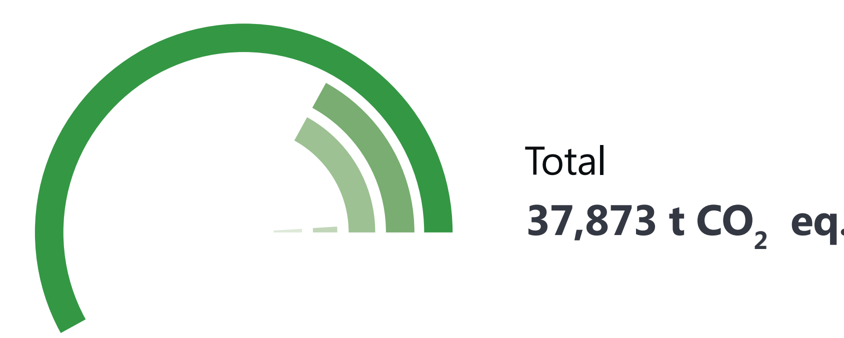
The Group's biogenic**** CO_2 emissions for 2024 were estimated at 105,194 t CO_2. Specifically, these emissions derive from the processes of the biogas utilization plants and a minimal amount from the combustion of wood pellets. It is worth mentioning, however, that the CO_2 eq. emissions from the biogas utilization activity of the landfills would be many times higher than the non-existence of these units, as a large amount of CH_4 would be released into the atmosphere, with the result that overall the positive impact from these plants would be much greater than their carbon footprint. In addition, for 2024, in the biogas recovery plants of HELECTOR, the amount of biogas used for energy production was 1,825,736 MMBtu.

In 2024, the Group's greenhouse gas (GHG) emissions are estimated at 37,873 tonnes of CO_2 eq.**** (Scope 1&2), reduced by 19% compared to 2023. Indirect emissions from electricity consumption from the grid (Scope 2) decreased by 25%, while direct emissions (Scope 1) decreased by 9% compared to 2023, due to actions to reduce the energy footprint and due to the improvement of the country's energy mix.

The methodology for calculating Scope 1&2 emissions for the reference year 2024 is based on both the widely recognized GHG Protocol and the International Standard ISO 14064-1:2018.

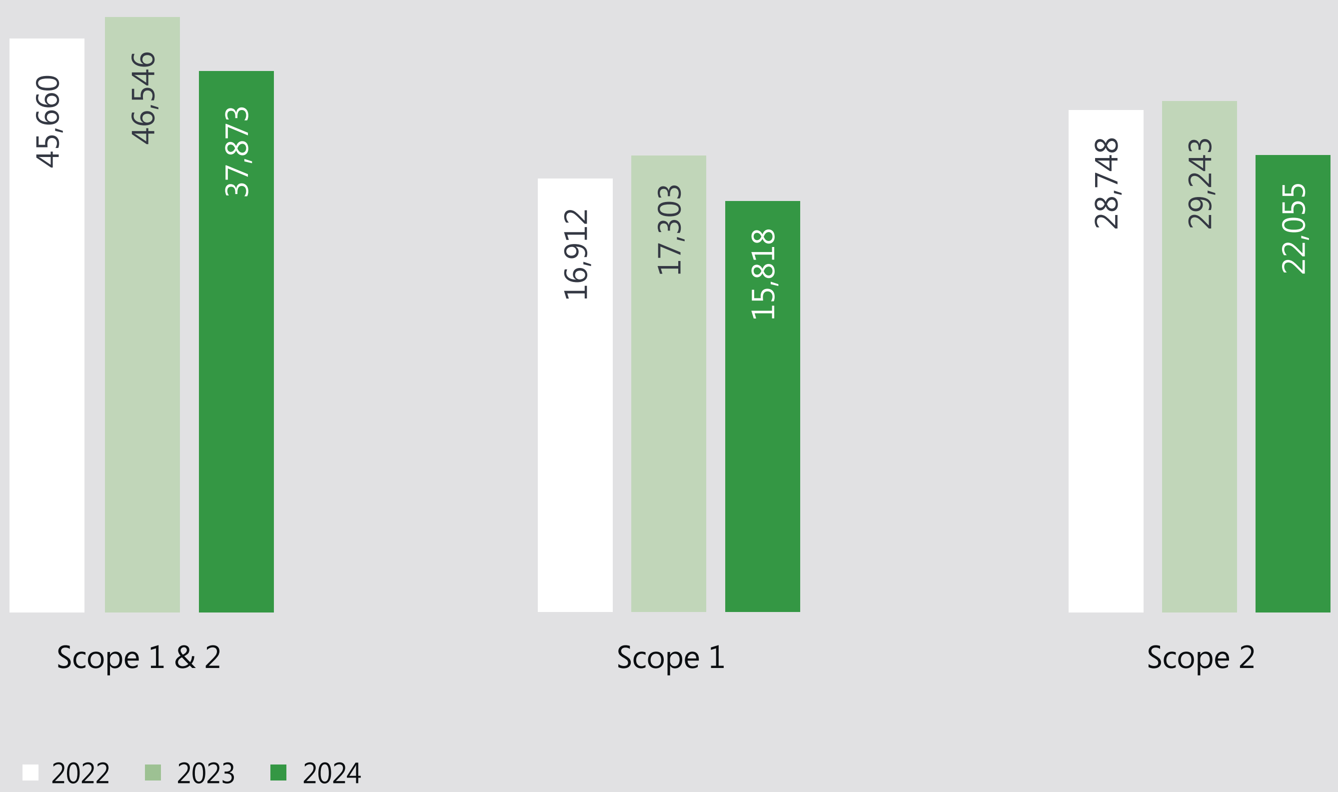
** CH_4 and N_2O emissions from the biogas utilization process and from the combustion of wood pellets at CO_2 equivalent have also been calculated. For the calculation of Scope 1 emissions for the reference year 2024, the emission factors from the following documents were used: Greece National Inventory Submissions 2024, Germany National Inventory Submissions/NID/CRF 2024, Cyprus National Inventory NIR/CRF/CRT 2024, DEFRA 2024, EPA 2024, IPCC – AR5.*
*** a percentage of all Scope 1 emissions.*
**** for the calculation of Scope 2 emissions for the reference year 2024, the emission factors from the following documents were used: DAPEEP 2023 (2024 Edition), IPCC - AR5, IEA 2022, AIB 2023.*
***** in direct Scope 1 emissions, biogenic CO_2 emissions have not been included, which, according to the GHG Protocol, ISO, ESRS-E1_AR43c, are reported separately. For the calculation of biogenic emissions for the reference year 2024, the emission factors from the following documents: Greece were used. National Inventory Submissions 2024, Germany. National Inventory Submissions 2024.*

GHG Scope 1&2 emissions (t CO_2 eq.)

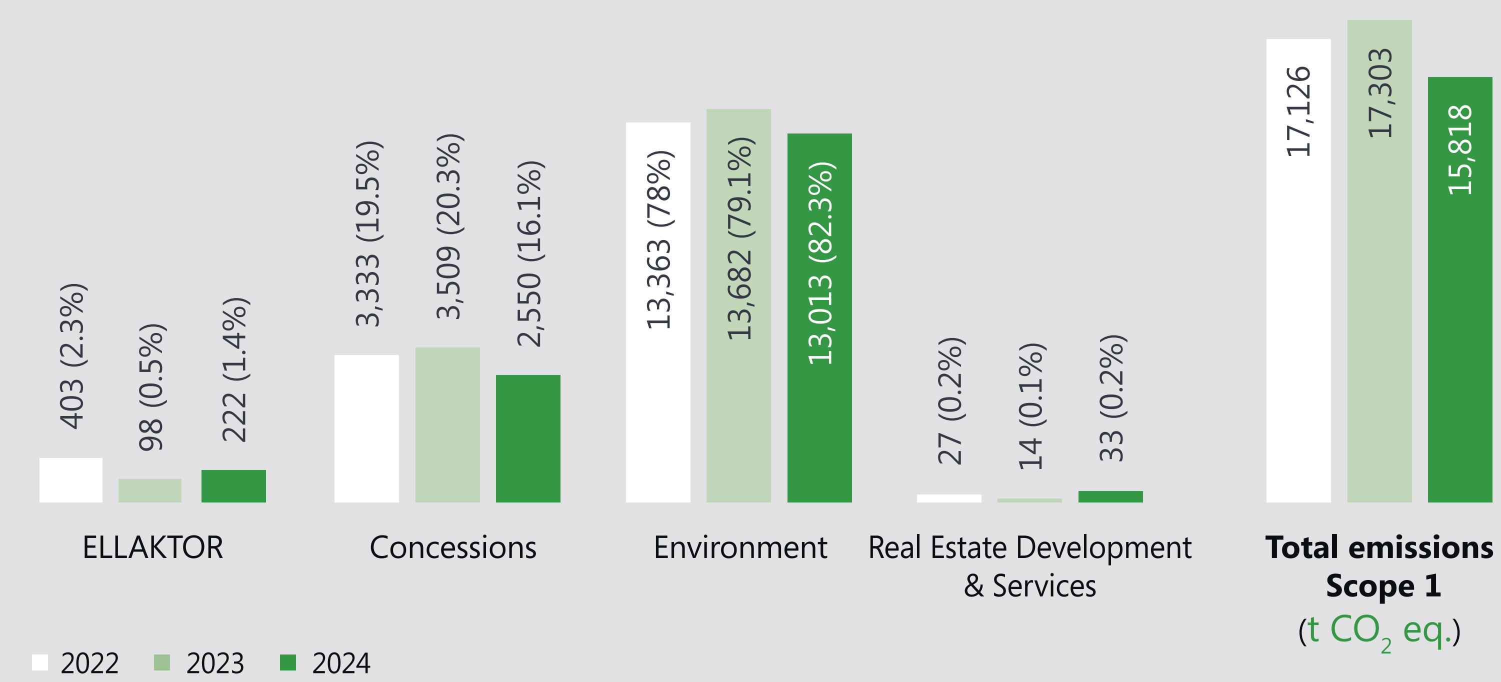


- Electricity from the grid **22,055** - 58%
- Chemical or physical treatment (waste incineration and waste treatment) **6,252** - 17%
- Fuel in mobile equipment **6,222** - 17%
- Fuel in stationary equipment* **2,795** - 7%
- Fugitive emissions from refrigeration/air-conditioning equipment **549** - 1%

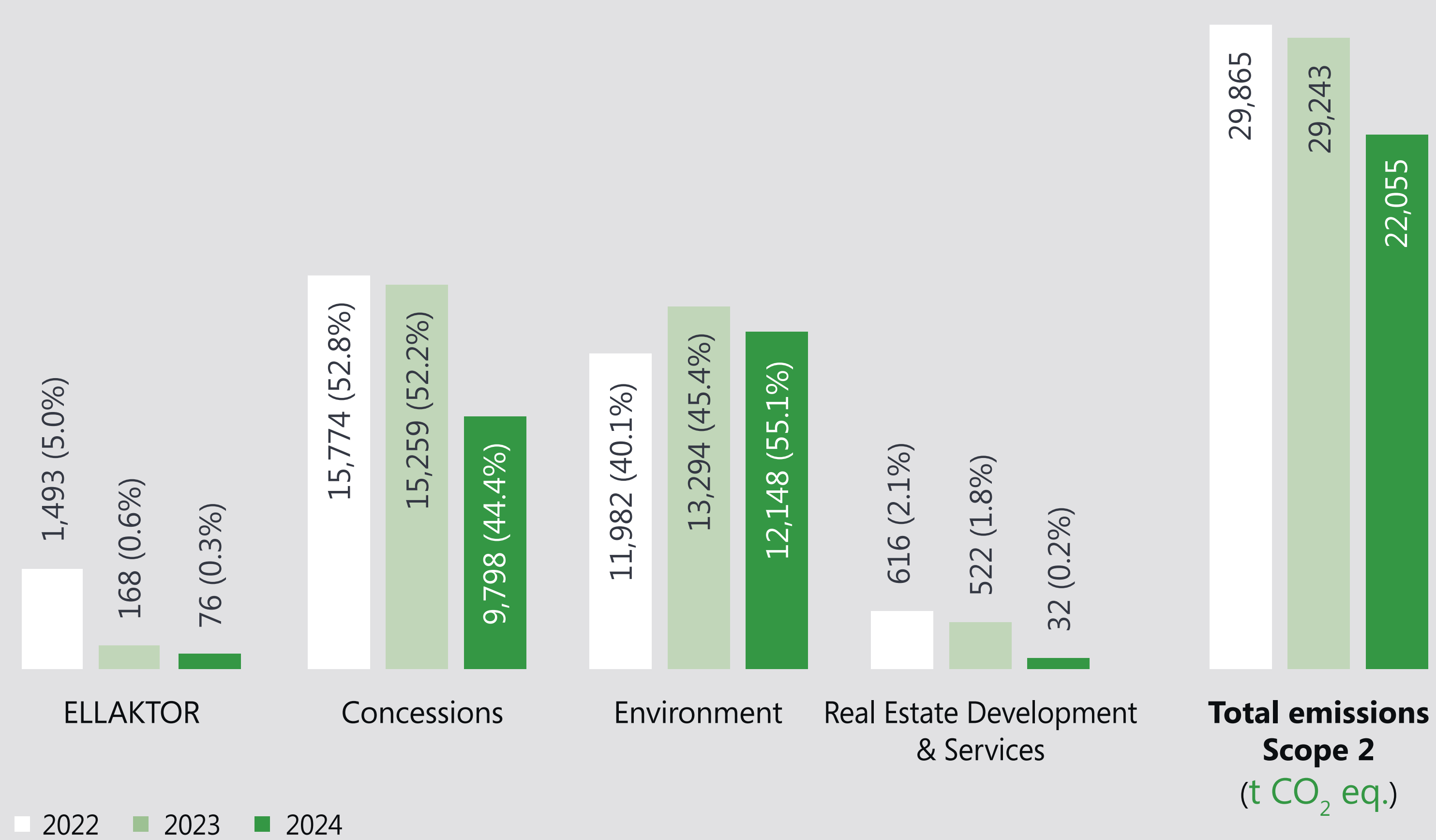
GHG emissions (t CO_2 eq.)



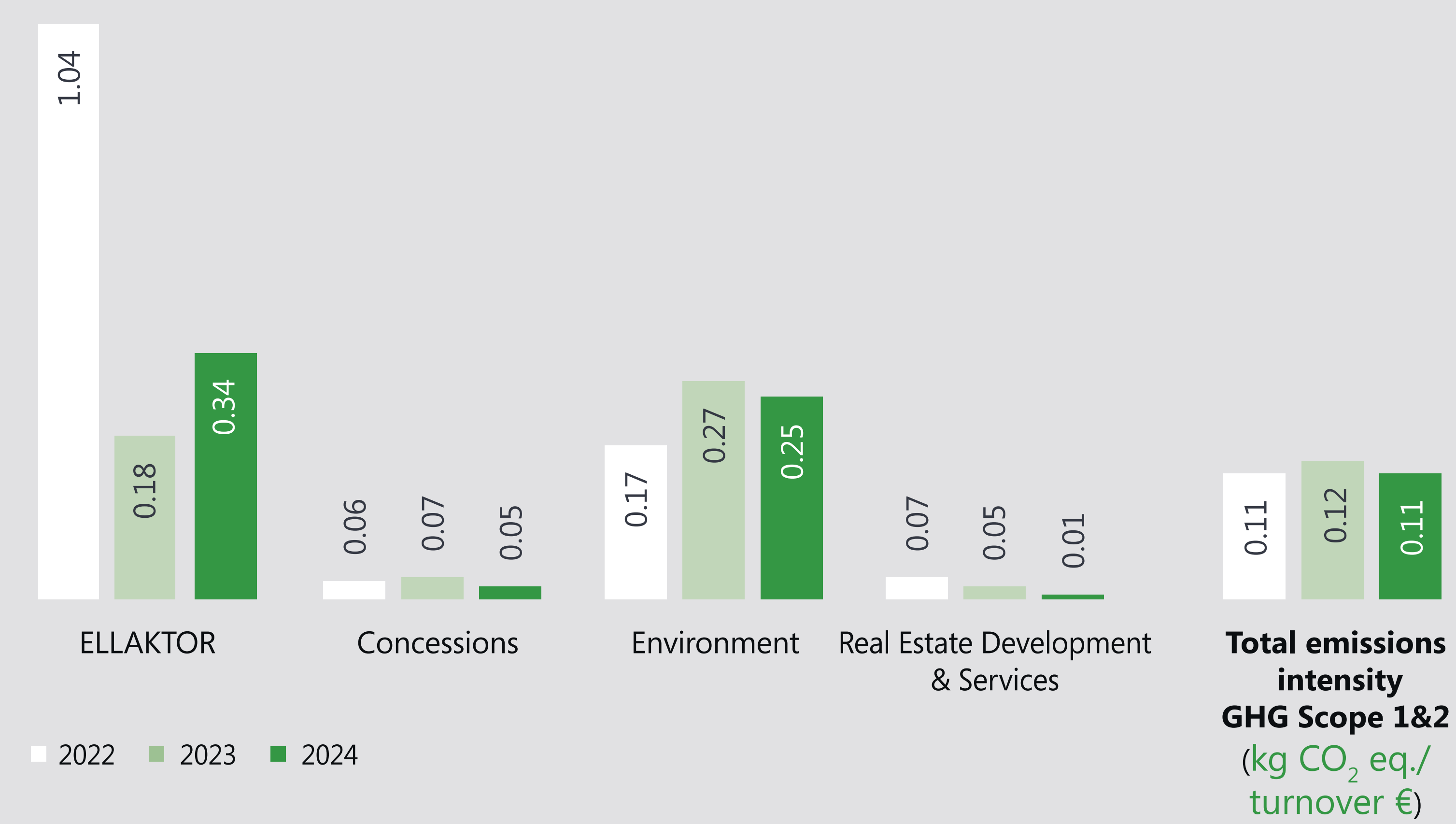
GHG Scope 1 emissions by segment (t CO_2 eq.)



GHG Scope 2 emissions by segment (t CO_2 eq.)



Scope 1 and 2 GHG Emissions Intensity by Segment (kg CO_2 eq./turnover €)



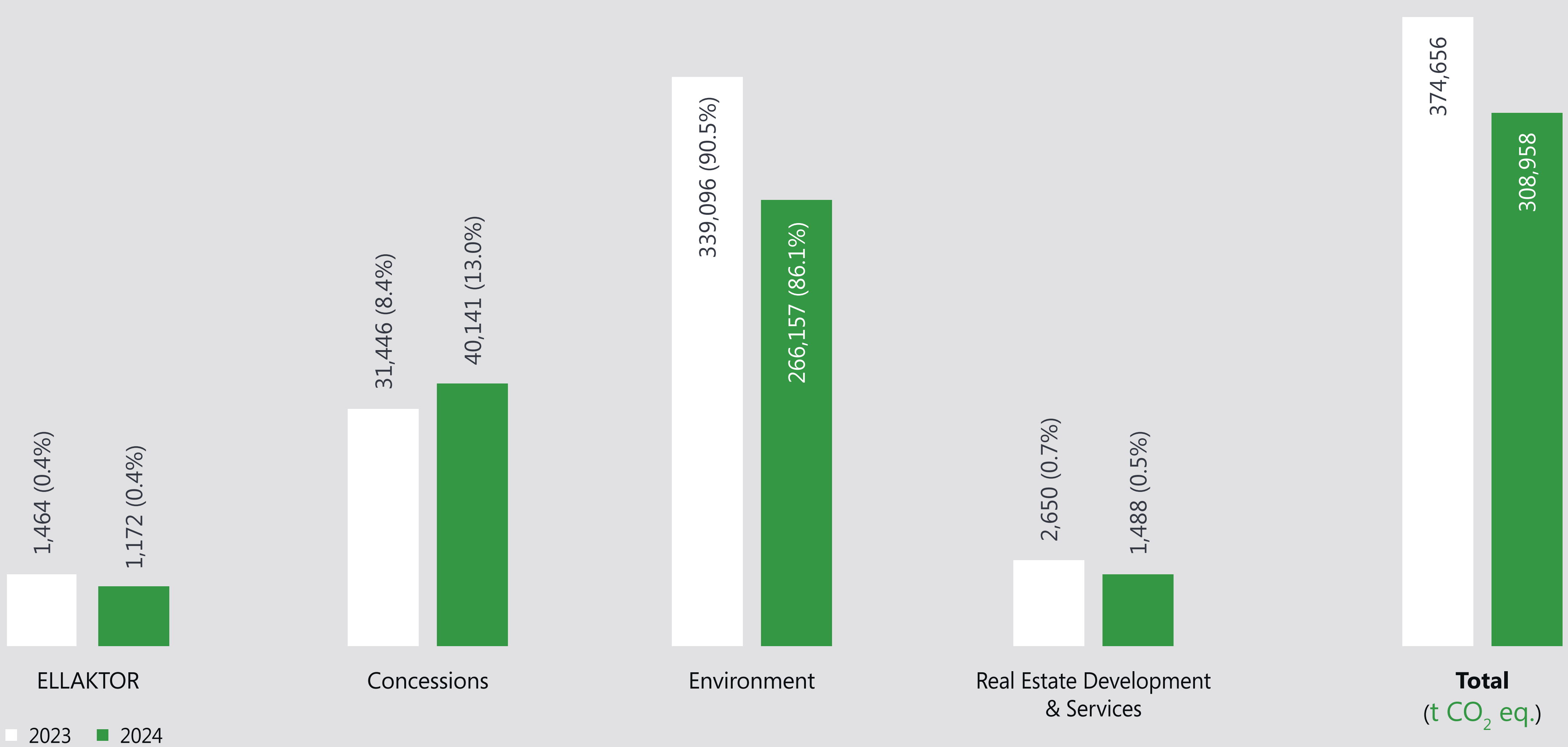
Other indirect greenhouse gas emissions (GHG Scope 3)

The Group's methodology for calculating other indirect Scope 3 greenhouse gas (GHG) emissions is based on both the widely recognized GHG Protocol and ISO 14064-1:2018. The Group's indirect Scope 3 emissions amounted to 308,958 tCO_2 eq., representing an 18% reduction compared to 2023, as illustrated in the following chart by category. This decrease was primarily attributable to lower emissions from Category 5 – Waste generated in operations, relating to waste treatment and disposal by third parties. Approximately 80.9% of the reported Scope 3 emissions were calculated using primary data obtained from business partners, including fuel invoices, delivery notes, and waste weighbridge records.

Scope 3 categories 8, 9, 10, 11, 12 and 14 were not calculated as they are not applicable to the Group's activity.

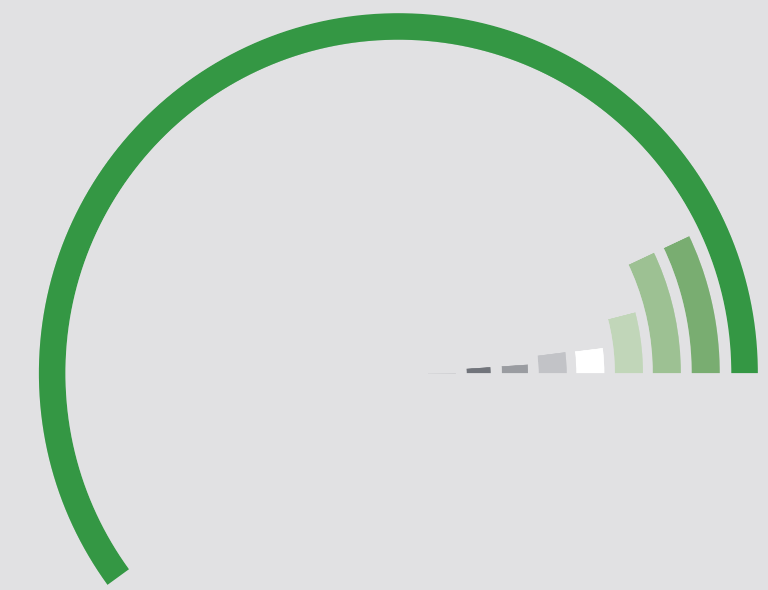
For the calculation of Scope 3 emissions, the emission factors from the following documents were used: BEIS 2021, EPA 2022, EXIOBASE 2019 – GR, EPA 2018, EXIOBASE 2019 – CY, DAPEEP 2024, DAPEEP Report 2022 and NIR 2022, Greece. National Inventory Submissions 2024, DEFRA 2024, Editorial deadline: 29 November 2023, Sheet «Scope 3_Scope 2 Upstream CO2eq», Cyprus. National Inventory Report (NIR) 2024, EPA 2024, Ecoinvent 3.11.

Other indirect emissions of GHG Scope 3 (t CO_2 eq.) by segment



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

Other indirect emissions of GHG Scope 3 (t CO_2 eq.) by category



- Waste generated in operations (Category 5)
  235,614 - 76%
- Purchased goods and services (Category 1)
  22,508 - 7%
- Capital Goods (Category 2)
  20,629 - 7%
- Investments (Category 15)
  11,512 - 4%
- Fuel- and energy-related activities (not included in Scope 1 or Scope 2) (Category 3)
  7,619 - 2%
- Upstream transport and distribution (Category 4)
  6,476 - 2%
- Employee commuting (Category 7)
  1,621 - 1%
- Upstream leased assets (Category 13)
  2,903 - 1%
- Business travel (Category 6)
  76 - <0.02%

Circular Economy

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, to decouple economic growth from the use of natural resources and to 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 development and prosperity by creating long-term value for the economy, society and the environment.

Recognizing the importance of the circular economy, but also the significant challenges in the transition process, the Group adopts practices 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.

Solid Waste Treatment Plants

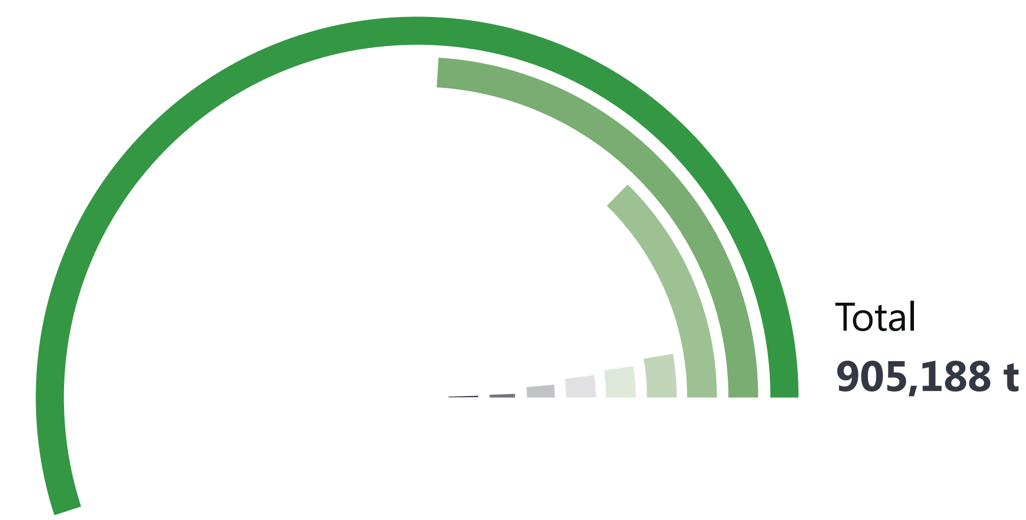
ENVIRONMENT

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 Southeastern Europe, while it is active in the entire range of design, construction and operation of modern waste treatment plants, biological waste treatment and biogas energy utilization 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 the residue disposed to landfill, diverting the biodegradable fraction from landfill and ultimately making a significant contribution to the transition to the circular economy.

More specifically, in 2024, waste treatment plants, in which companies in the Environment segment participate, managed 862,031 tonnes of waste compared to 816,199 tonnes in 2023, of which 853,512 tonnes of non-hazardous waste (municipal waste) and 8,519 tonnes of hazardous waste (hospital/infectious waste). The method of managing the waste output of these plants is presented below.

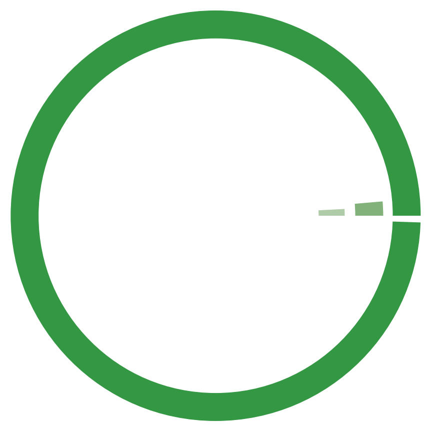
Management Method for Output Non-Hazardous Waste (t)



- Landfill **496,398** - 54.8%
- Other disposal method **212,173*** - 23.4%
- Recycling **113,927** - 12.6%
- Reuse **24,572** - 2.7%
- On-site temporary storage **20,723** - 2.3%
- Combustion with energy recovery **17,768** - 2.0%
- Other method of recovery **13,162** - 1.5%
- Compost **5,407** - 0.6%
- Combustion **1,058** - 0.1%

**use as a ground cover material in landfills*

Management Method for Output Hazardous Waste (t)



- Combustion **4,683** - 99%
- Recycling **38** - 0.8%
- On -site temporary storage **9** - 0.2%

Note: *The difference in the amount of input and output waste (hazardous and non-hazardous) is due to the treatment method, the loss of moisture by the waste, as well as quantities of previous year's stored waste that were processed in 2024 and quantities of new input waste that were temporarily stored at the end of the year pending its management.*

The Group's portfolio in Greece and abroad in the Environment segment includes the following main projects:

- The only Hazardous Healthcare Waste Incineration Facility in Greece (EPALTHEA S.A.), which simultaneously recovers the thermal energy generated (Waste-to-Energy), thereby meeting the needs of all healthcare facilities across the country and contributing to the protection of public health and the effective and environmentally sound management of hazardous waste.
- The Sterilisation Unit for Infectious Hazardous Healthcare Waste (IHHW), employing advanced sterilisation methods and technologies, as well as the Storage Facility for Mixed Hazardous Waste (MHW) and Other Hazardous Waste (OHW) generated by healthcare facilities.
- The Integrated Waste Management System (IWMS), the first Public-Private Partnership (PPP) project for waste management in Greece.
- The operation and maintenance of the Mechanical Recycling and Composting Plant (Green EMA), which manages approximately one-sixth of the municipal waste generated in the Attica Region.
- The Mechanical Biological Treatment (MBT) Plant in Larnaca, Cyprus, for the recovery of recyclable materials from mixed municipal waste.
- Two Materials Recovery Facilities (MRFs).

It is worth mentioning that the subsidiaries of the Environment segmant, such as ASA RECYCLE, enter into co-operation relationships with subsidiaries of other segments of the Group, for the receipt and management of waste such as mixed packaging resulting from the latter in order to extend their lifespan, in the context of strengthening industrial symbiosis.

Wastewater Treatment Plants

Waste Management of Wastewater Treatment Plants

Within the Environmental segment, the leachate treatment plants associated with landfill operations represent projects of significant importance due to their contribution to the protection of soil, subsoil, groundwater, and biodiversity. The two main facilities—the Mavrorachi Leachate Treatment Plant (LTP) and the Liosia–Fyli Leachate Treatment Plant (LTP)—are designed to ensure that the entire leachate treatment infrastructure adequately meets the operational needs of the landfills while achieving the required effluent quality standards. The treated effluent complies with the quality requirements specified in the environmental permits governing the operation of these facilities.

These Leachate Treatment Plants (LTPs) are critical infrastructure within an Integrated Waste Management Facility, as their operation ensures that a landfill meets environmental requirements for the management of leachate. By effectively treating leachate, they help prevent groundwater contamination while also contributing to water conservation through the reuse of treated water.

More specifically, at the Mavrorachi Leachate Treatment Plant (LTP), state-of-the-art equipment will be installed to further enhance leachate management by combining Ultrafiltration (UF) and Reverse Osmosis (RO) technologies. At the Liosia–Fyli Leachate Treatment Plant (LTP), leachate is treated using an advanced system that incorporates reverse osmosis, biological treatment with ultrafiltration membrane technology, and a brine treatment unit. In addition, the facility recovers treated water suitable for irrigation, while evaporation units are operated to further increase water recovery and significantly reduce the volume of concentrated leachate.

453,299 m^3

Total amount of waste water entering the LTP for treatment

178,111 m^3

Total amount of treated water from the LTP reused

Solid Waste Management

The Group implements a comprehensive hazardous and non-hazardous waste management program aimed at reducing both the quantity of waste generated and its level of hazardousness, while minimizing waste disposal to landfill. Through these initiatives, the Group contributes to improving its overall environmental performance indicators.

Management is based on prioritizing prevention, preparation for reuse, and recycling, prioritizing recovery methods (R) over disposal (D). This is achieved through sorting at the source, which includes: training and awareness of employees, infrastructure development, cooperation with licensed units and monitoring of overall performance, thus contributing to the circular economy and the protection of ecosystems.

The management follows the requirements of national and European legislation, the environmental licensing of the projects, internal procedures, customer requirements and the specifics of each project. The collection, transport and final disposal is carried out exclusively by licensed bodies registered in the Electronic Waste Register (EW), with documentation of all documents and identification forms for hazardous waste, as provided by law. Waste streams subject to extended producer responsibility (EPR), such as Waste Electrical and Electronic Equipment (WEEE), batteries and accumulators, waste lubricating oils, end-of-life tyres, and similar materials, are managed through approved alternative waste management schemes. In particular, hazardous waste is temporarily stored in specially designed and covered areas with a perimeter parapet within the projects, until it is disposed of for recovery or disposal through collectors registered with the HMA to the final licensed recipients. At the headquarters, recycling programs of at least four streams (paper, glass, aluminum, plastic) and management of hazardous and alternative waste such as electronic equipment, computers, monitors, batteries, accumulators and lubricating oils are implemented.

Companies in the Concessions segment recycle all waste resulting from the operation of motorways (lubricants, accumulators, scrap iron, green waste, etc.). On ATTIKI ODOS, the road surface replacement program and the management of excavation, construction and demolition waste (ECDW) continue.

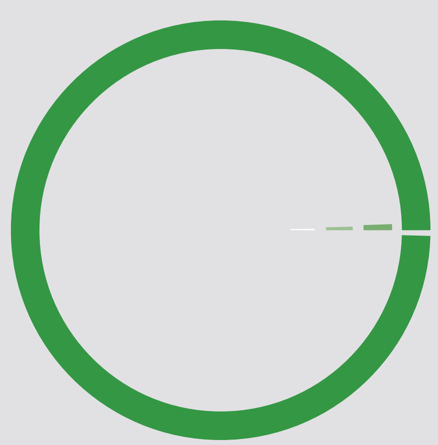
To ensure comprehensive and systematic waste tracking, the Group has developed an electronic platform through which, on an annual basis, the quantity and management method of each waste stream are recorded for every project by the project's Environment & Energy Manager. The submitted data are subsequently reviewed and approved by the Environmental Manager of each subsidiary.

Management of Solid Waste generated by the Group's operation

The Group diverted 99% of the hazardous and non-hazardous waste generated from its operations at facilities and projects under its direct management to recovery operations (R), an increase of 2 percentage points compared to 2023. This performance enabled the Group to achieve its medium-term target of diverting at least 80% of waste from landfill ahead of schedule.

More specifically, 85,697 tonnes of non-hazardous waste and 1,278 tonnes of hazardous waste were managed through recovery operations (R) rather than landfill disposal. The waste management methods applied to the total waste generated by the Group's operations are presented in the following charts, while a detailed breakdown by waste stream is provided in the tables included in the Annex.

Non-Hazardous Waste Management Methods (t)



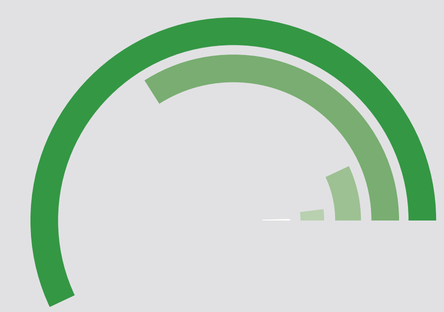
Total
85,905 t

- Recycling **85,686** - 99.7%
- Landfill **131** - 0.2%
- Other disposal method **75** - 0.1%
- Other recovery method **11** - 0.01%

Reuse: 0.3 - 0.0003%
Combustion: 1.7 - 0.0021%

***Note**: the significant quantity of non-hazardous waste is mainly attributable to the construction and demolition waste (CDW) generated through the pavement replacement programme undertaken for the ATTIKI ODOS project.*

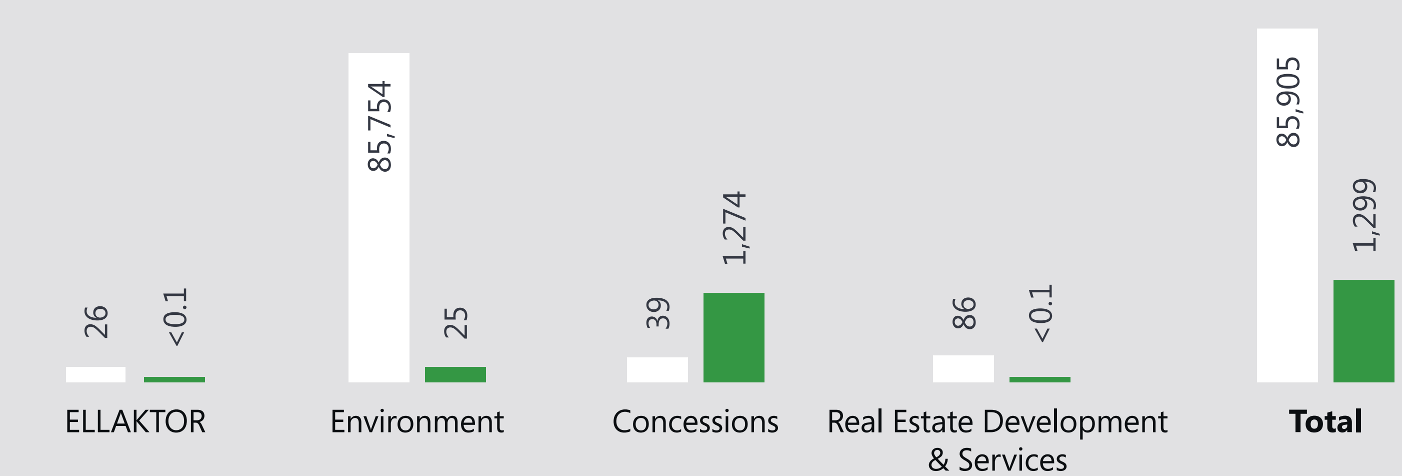
Hazardous Waste Management Methods (t)



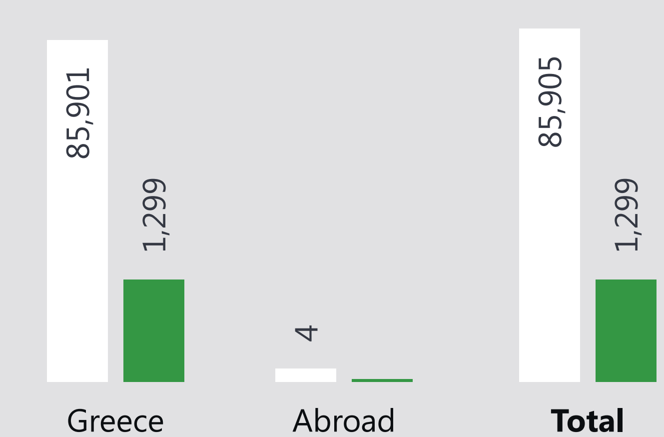
Total
1,299 t

- Reuse **740** - 57%
- Other recovery method **446** - 34%
- Recycling **92** - 7%
- On-site temporary storage **21** - 2%
- Combustion **0.2** - <0,1%

Production of hazardous and non-hazardous waste by segment



Waste by country



Tonnes of non-hazardous waste (t) Tonnes of hazardous waste (t)

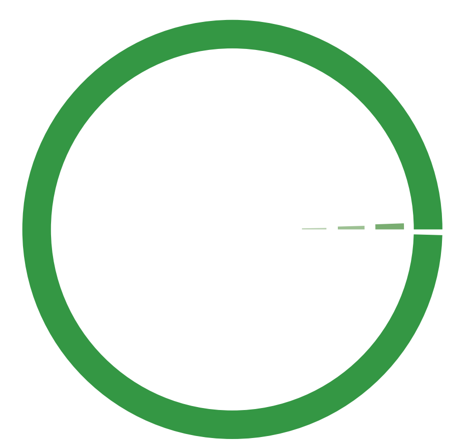
Third-Party Solid Waste Management

Waste managed by the Group's companies and subcontractors

In addition to the waste generated from its own operations, the Group also manages waste generated during the construction, operation, and maintenance of projects carried out on behalf of third parties. During the reporting year, 99% of the hazardous and non-hazardous waste managed by the Group or its subcontractors on behalf of third parties was managed through recovery operations (R).

The waste management methods applied to the total waste managed by the Group's companies and subcontractors are presented in the following charts, while a detailed breakdown by waste stream is provided in the tables included in the Annex.

Non-Hazardous Waste Management Methods (t)



Total
81,101 t

- Reuse **80,410** - 99.1%
- Recycling **574** - 0.7%
- Other recovery method **98** - 0.1%
- Landfill **19** - <0.1%

Hazardous Waste Management Methods (t)

Total
89 t

- Other recovery method **32** - 36%
- Recycling **26** - 29%
- Reuse **24** - 27%
- Other disposal method **4** - 5%
- Combustion **2** - 2%
- On-site temporary storage **1** - 1%

Natural Resources and Raw Materials Management

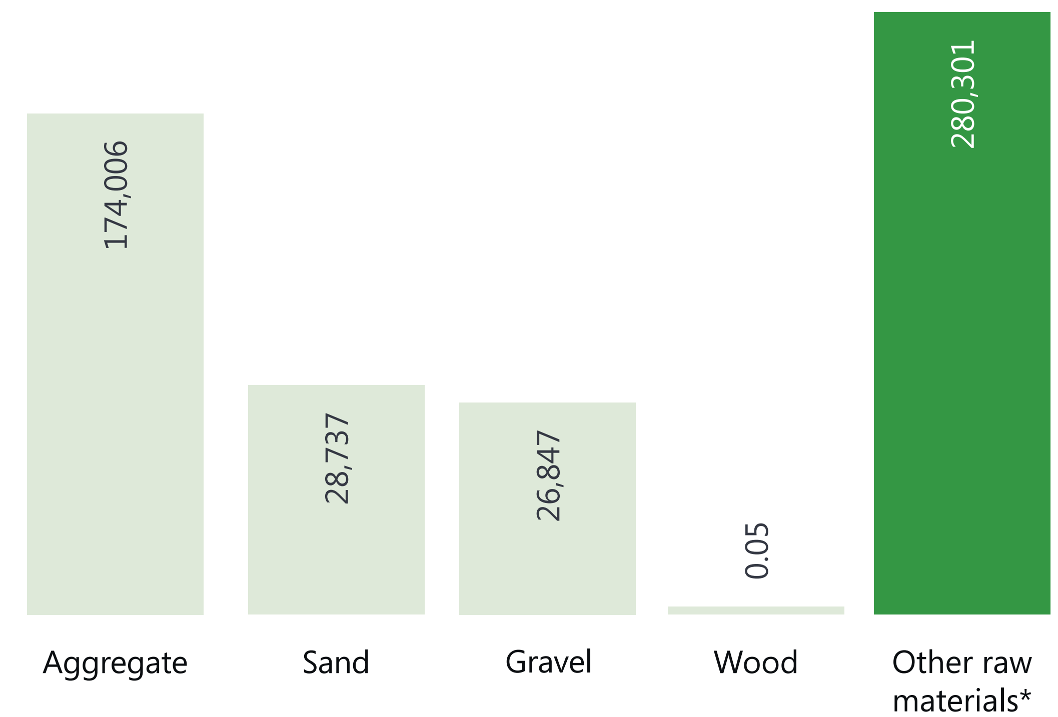
ELLAKTOR Group is committed, through its Environment & Energy Policy, to the effective management and saving of raw materials and natural resources and plans actions to achieve sustainable management and adequate use of these by implementing relevant procedures through the Environmental Management Systems.

Through its Environmental segment, the Group implements circular economy practices, promoting the sound management of waste, the separation and recovery of recyclable materials, the production of alternative fuels, and the energy recovery of landfill gas generated at landfill sites. These practices reduce waste generation, enhance recycling and reuse, and contribute to the conservation of natural resources and raw materials.

The Group's goal is to incorporate criteria into the projects to enhance the choice of products with a higher percentage of renewable and recyclable materials. It is worth mentioning that in 2024, 3,516 tonsne of products were eco-label certified in the Group's projects.

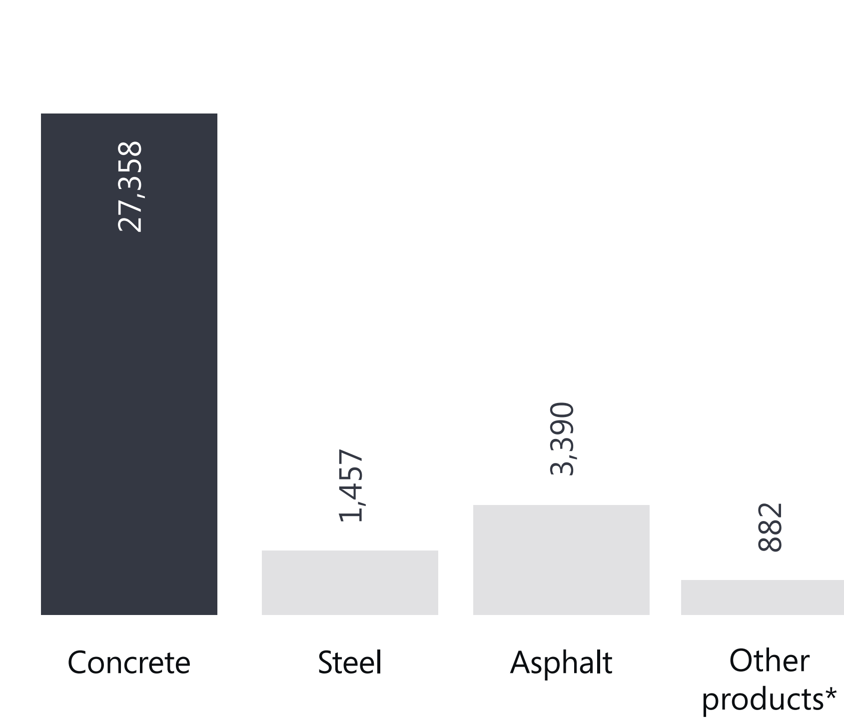
The following charts show the consumption of basic raw materials and products for the year 2024.

Total quantity of basic raw materials: 509,891 t

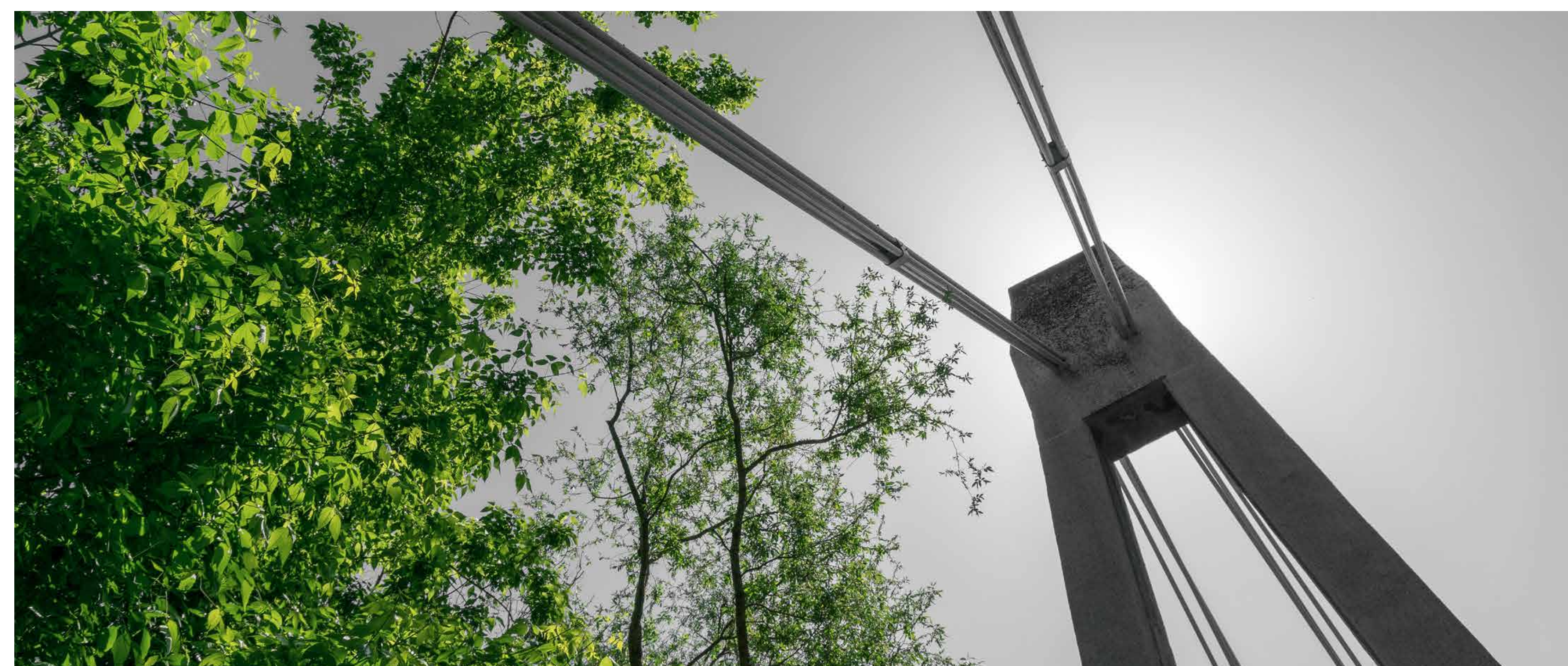


*soil

Total quantity of basic products: 33,087 t



*indicative chemical additives, pipes, paints, cement



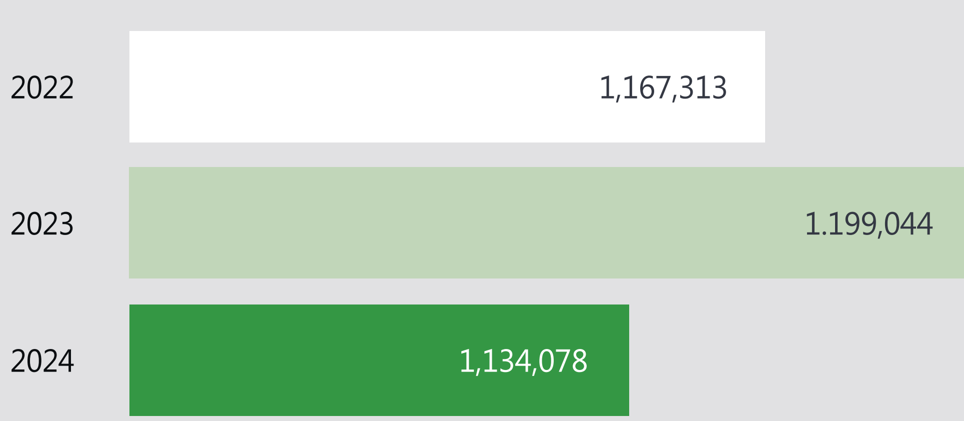
Water Management

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

By implementing Environmental Management Systems in accordance with the requirements of 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 the greatest possible savings. Indicatively, practices applied to 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 wastewater from biological treatment, the periodic control of quality, chemical and microbiological parameters of water quality.

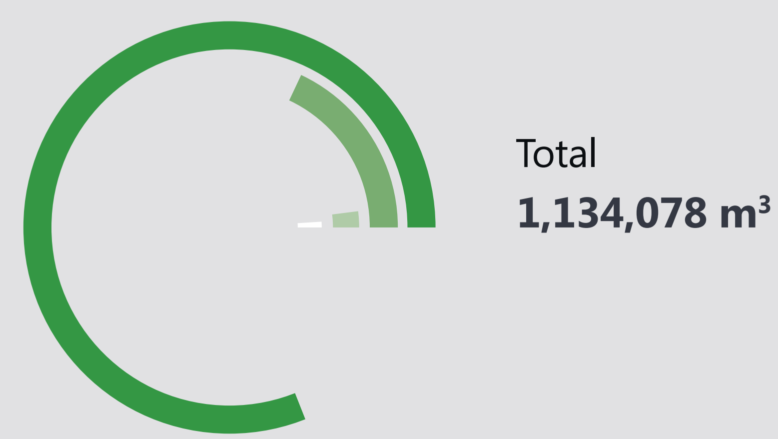
Total water withdrawal in 2024 at Group level amounted to 1,134 ML, of which 7% was water that was recycled or reused.

Total amount of water withdrawal (m^3)



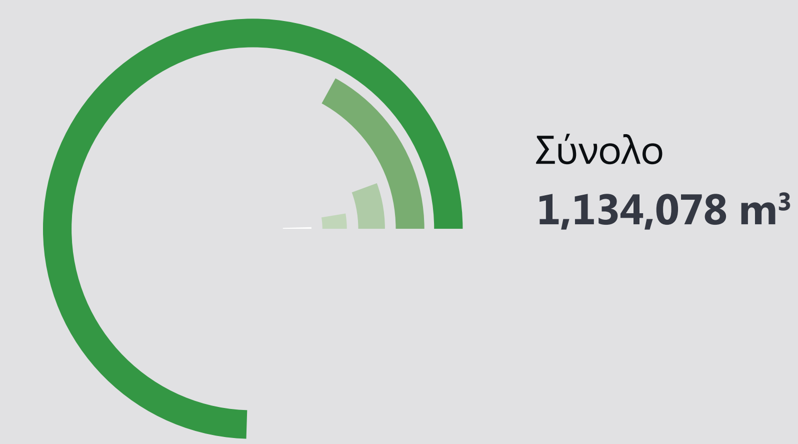
More specifically, the Group's water withdrawal is presented in the following charts by segment and water source, showing that the primary use of water relates to the Concessions segment and is sourced predominantly from groundwater:

Water withdrawal by segment (m^3)



- Concessions **915,953** - 80.8%
- Environment **201,528** - 17.8%
- Real Estate Development & Services **14,735** - 1.2%
- ELLAKTOR **1,862** - 0.2%

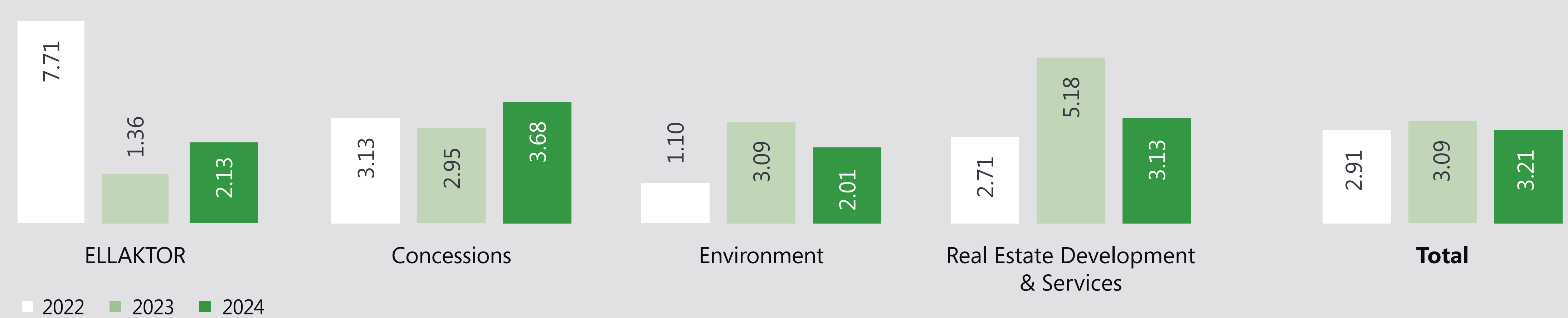
Water withdrawal per source (m^3)



- Groundwater **847,644** - 74.7%
- Third Party (Public or Private Water Supply Networks) **192,902** - 17.0%
- Wastewater from sources within the project **63,353** - 5.6%
- Other sources **29,047** - 2.6%
- Rainwater **1,132** - 0.1%

In 2024 there was a decrease in water withdrawal per turnover (m^3/thousand €) in the Environment and Real Estate Development and Management segment.

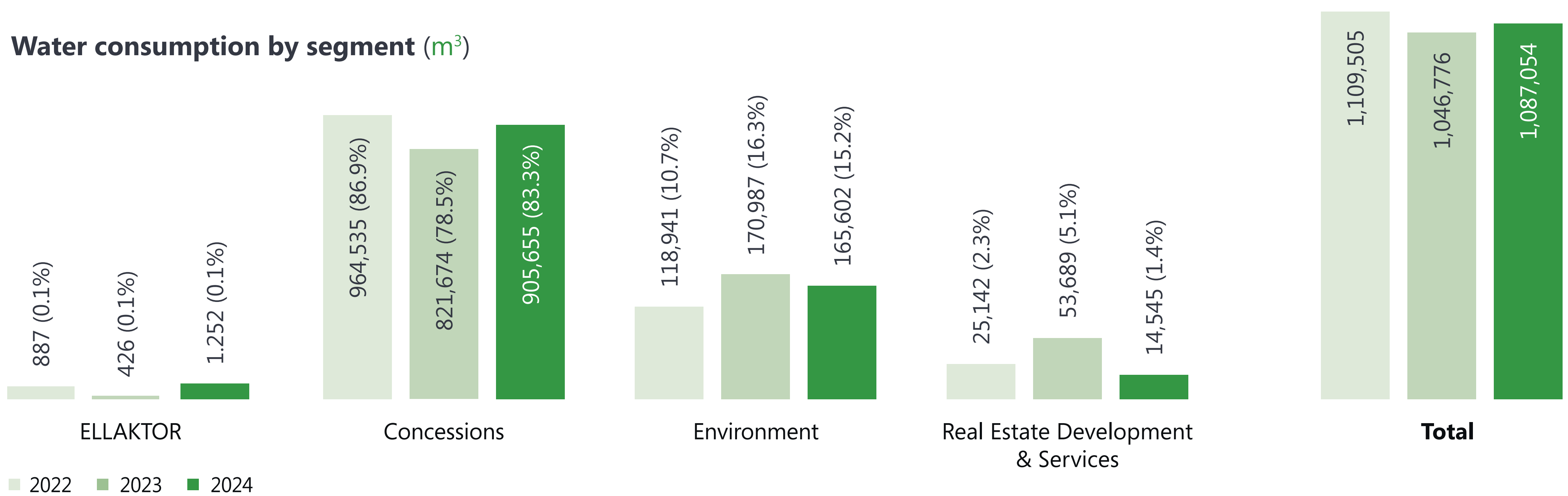
Specific Water Withdrawal by Segment (m^3)



The analysis of water withdrawal by water source and by type of water quality, depending on the concentration of Total Dissolved Solids (TDS) is shown in the Annex.

The total water consumption from the Group's activities for 2024 amounted to 1,087,054 m³ and is broken down by segment in the chart below:

Water consumption by segment (m³)



The total water discharges from the Group's activities for 2024 amounted to 47,024 m³ and the discharge per recipient is analyzed in the Annex.

In the **Concessions segment**, water saving practices are applied, such as irrigation scheduling for maximum efficiency (watering at night), immediate repair of faults - leaks, systematic network maintenance, reuse of water from biological treatment plants for limited irrigation at Motorist Service Areas.

In particular, in MOREAS, the use of water mainly concerns the coverage of the needs in irrigation, firefighting and water supply. The main use of water concerns the irrigation needs of the planting of the islet, the supports and the junctions of the Motorway which change depending on the weather conditions, growth and the type of plants. 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 uses in order to identify any unexpected changes. The monthly monitoring of consumption, combined with regular visual inspection and maintenance of the irrigation network, ensure the minimization of losses, consistency of leaks.

Furthermore, in the pumping stations from which the single water supply network of the motorway is supplied, there are installed pressure gauges, which provide in real time, to the Control and Maintenance Center, information about 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 degradation trends. Finally, the reuse of the treated effluent of the Wastewater Treatment Plants for irrigation of fenced and inaccessible to the public green spaces, contributes to water saving.

Accordingly, ATTIKI ODOS complies with all the obligations arising from the licensing of the water wells (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 permits concerning the project's wastewater treatment plants are complied with.

In the **Environment segment**, HELECTOR consistently implements measures for the 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 areas facilities. The liquid waste produced by the various processes of the companies in the sector is divided into industrial waste and urban wastewater.

Due to the different pollutant loads of industrial wastewater and municipal wastewater, different treatment technologies are applied prior to their discharge to the receiving environment, in accordance with the environmental permit conditions applicable to each facility. In addition, the quality of wastewater generated from the operation of waste management facilities (e.g. landfills, Material Recovery Facilities (MRFs), Mechanical Biological Treatment (MBT) plants) is monitored through regular analytical testing.

In the **Real Estate Development & Services segment** and specifically in the Alimos Marina there is continuous training, information and awareness of the employees, as well as the users of the marina regarding water saving. Also, the rational management of water and the recording of pumping per source is promoted, while its reuse is implemented where possible, in accordance with the environmental terms.

Air & Soil Quality

Air Pollutants and Air Quality

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

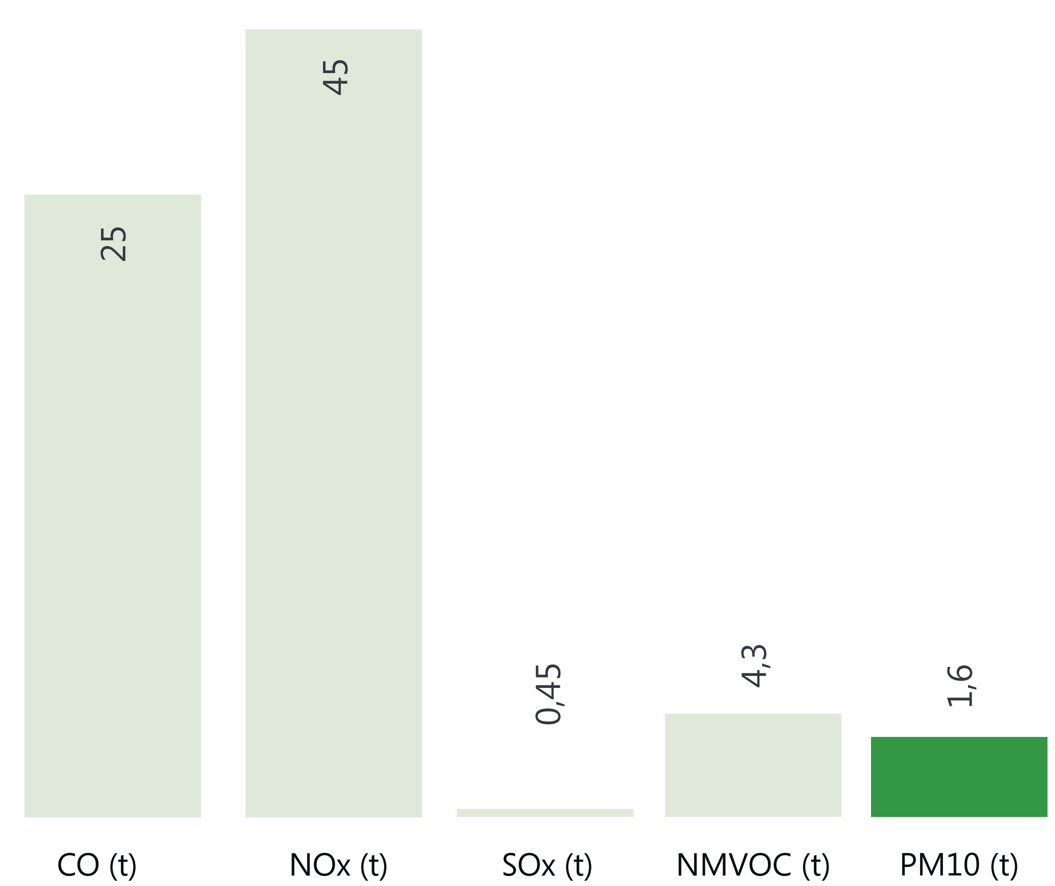
In the Group's projects, procedures are applied to prevent air pollution during their construction and operation. Indicatively, the measures taken in the projects in order to comply with the legislation and the environmental conditions regarding the limits of air emissions, are the application of Best Available Techniques (BAT) at source to reduce air emissions, the installation and operation of appropriate anti-pollution equipment and techniques where required.

Indicatively, some techniques are filters (bag filters, electrostatics, biofilters), the implementation of fuel saving practices, the reduction of electricity consumption, the covering of material conveyor belts, the covering of outdoor material storage areas, the wetting of traffic routes and piles of material or waste deposits, the covering of trucks transporting materials, reducing the storage time of materials and the height of piles to avoid dust dispersion, systematic maintenance of equipment, machinery and vehicles, prudent use of equipment and avoiding unnecessary movements.

In particular, the biogas energy recovery plants of the Environment segment are projects of strategic importance for the energy and environmental improvement of regional landfills. With the biogas produced by the landfills that feeds the plants, renewable electricity is produced, while avoiding the release of greenhouse gases (specifically, methane CH_4), 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, gasoline for mechanical equipment, motor gasoline, LPG and CNG) were recorded and calculated. For the calculations, the emission factors from the EMEP/EEA Air Pollutant Emission Inventory Guidebook 2023 were used.

Other air emissions



ENVIRONMENT SEGMENT

In particular, in the Group's Environment segment, the best available techniques for combustion are applied and continuous inspections are carried out in order to minimize air emissions. HELECTOR implements a plan for monitoring the air emissions of the Ano Liosia hospital waste incineration unit, in accordance with the requirements of the relevant legislation. The aim is to technically evaluate the performance of the combustion parameters, as well as the continuous and lawful operation of the incineration plant. The plan concerns the online analytical systems for monitoring parameters and air pollutants and the periodic monitoring of air pollutant concentrations by externally certified laboratories.

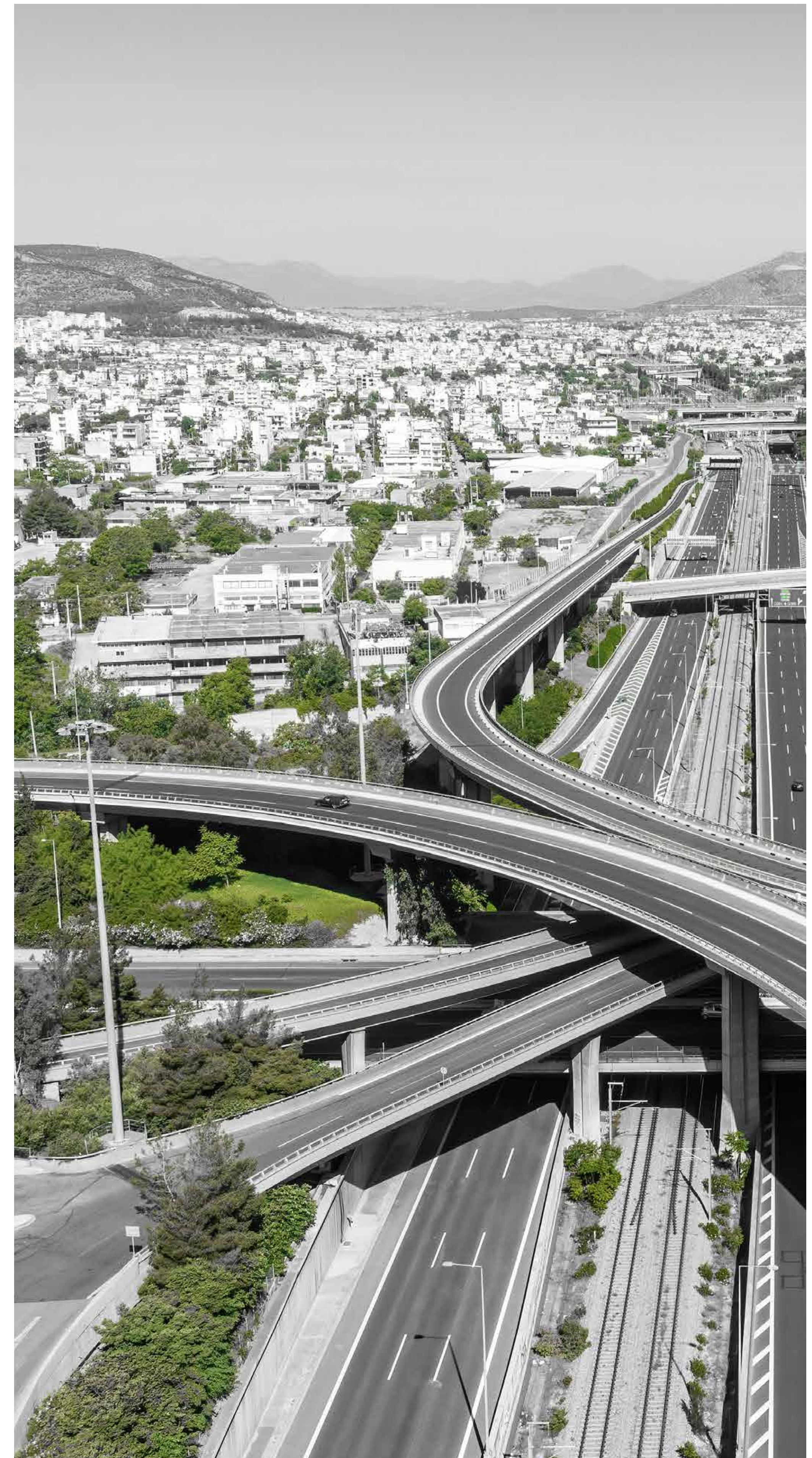
The control of air emissions is carried out using modern measurement equipment. The measurement program covers both spot and diffuse emissions on a continuous and periodic basis. The analyzers are connected to the control system (DCS) of the factory, which provides the possibility of complete control of the operation of the units with the aim of minimizing air pollution.

CONCESSIONS SEGMENT

On ATTIKI ODOS, air pollution levels are monitored by 8 stations, installed along the motorway, which measure all air pollutants defined by the relevant European Legislation (NO_2, CO, benzene and suspended particles PM10 and PM2.5) 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 Road Axis in locations near or within the boundaries of settlements, through which continuous and uninterrupted measurement and recording of CO, NOx, SO_2 pollutants is carried out, BTX and suspended particles. The results of the measurements are sent on a quarterly basis to the competent Services of the Ministry of Environment and Energy.

In Alimos Marina, in order to ensure the protection of the atmosphere, an air emissions monitoring program is implemented and air pollutant controls and measurements are carried out in accordance with the environmental terms Approval Decision. In 2024, 4 measurements were carried out by the operating body of the New Alimos Marina with an external partner. The results of the sample analyses for 2024 showed that the general assessment of the air quality in the project is considered to be environmentally good.



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 preventing soil, subsoil and water pollution in the areas where it operates. The result of the implementation of these procedures is the fact that in 2024 no fine was imposed for environmental management issues.

More specifically, as previously described, the Group implements a waste management programme that includes the proper storage of waste through source segregation, in accordance with applicable legal requirements, and its regular transfer to licensed final recipients for further treatment and management. In particular, hazardous waste is stored in appropriate containers within designated and specially designed storage areas that are protected from weather conditions and equipped with impermeable secondary containment systems. The minimum required separation distances from areas vulnerable to groundwater contamination are also maintained. In addition, equipment and machinery maintenance is carried out in specially designated maintenance areas designed to protect the soil from potential leaks and spills.

To further strengthen environmental protection, dedicated Emergency Response Plans have been developed for the Group's projects and are activated in the event of an incident (e.g. a waste spill). The projects are also equipped with appropriate spill response equipment, including absorbent materials, to minimise or prevent any potential pollution of the surrounding environment and nearby receiving bodies. Regular emergency preparedness drills are conducted to verify the effectiveness of these plans.

In the Concessions segment of the MOREA project, the following additionally apply:

Wastewater Management

Treatment of municipal wastewater in Wastewater Treatment Plants (WWTPs) and reuse of treated effluent for irrigation of designated fenced green areas, in accordance with the requirements of the environmental terms.

Quality Monitoring

Implementation of a sampling and analysis program, in addition to those provided by law, by contracted and appropriately certified laboratories to monitor the quality of the effluent of treated wastewater, as well as monitoring the quality characteristics of irrigated areas through soil analyses.

Waste Management from Tunnels

A system for collecting wastewater that may occur within the tunnels in pollutant retention tanks.

Solid Waste Management

Collection of municipal waste on a regular basis along the Road Axis and its management in accordance with the applicable legislation.

In the Alimos Marina project, a program of measurements of sea water quality is implemented, with a frequency of 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 in accordance with the environmental terms of the project.

In the Environment segment, the construction of watertight reception and landfill areas (landfills) and the collection of leachate, the application of recycling and composting methods of municipal waste, the composting of bio-waste and the production of secondary fuels from municipal waste, the operation of systems for the collection of liquid waste/leachate of facilities and biological/chemical cleaning and reverse osmosis units.

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 the protection of biodiversity, compliance with legislation and environmental requirements, as well as the environmental management procedures applied to projects related to areas of high environmental value.

Biodiversity indicators

4

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

995,561 m^2

Total area of protected habitats (for animals, plants and other organisms)

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 referred to in the approved environmental terms.

The projects that have been recorded as belonging to or adjacent to protected and/or high-value biodiversity are MOREAS, MOREAS SEA, ATTIKI ODOS and the Arnaia landfill.

Indicative measures taken are:

- Siting projects at an adequate distance from habitats such as shrub and tree clusters, broadleaf or coniferous forests, streams, lakes, and buildings (occupied or abandoned) where these may serve as wildlife refuges.
- Recording and mapping land use in the wider project area and identifying areas containing protected flora and fauna species, including threatened species.
- Conducting pre-construction inspections to identify the presence of wildlife in flooded ditches and at river crossings before works commence.
- Avoiding interventions in river channels and river regulation works.
- Installing appropriate fencing to protect local flora and fauna, including dedicated wildlife fencing to prevent wild and stray animals from entering motorways.
- Minimising vegetation disturbance and limiting landscape alteration to the extent strictly necessary.
- Implementing reforestation programmes in areas equivalent to those affected by project activities following the completion of construction works.
- Collecting and storing excavated material and topsoil containing fertile soil for reuse in environmental restoration and site rehabilitation activities.
- Avoiding construction activities during environmentally sensitive periods, particularly during bird nesting and breeding seasons.
- Ensuring the immediate transfer of injured wildlife to a local wildlife rescue and rehabilitation centre when encountered.

According to the Red List of Threatened Species of the International Union for Conservation of Nature / IUCN (IUCN), the species listed in the Group's activities for 2024 are illustrated in the table below:

IUCN Red List of Threatened Species	2024
Critically Endangered (CR)	0
Endangered (EN)	3
Vulnerable (VU)	6
Near Threatened (NT)	5
Least Concern (LC)	71

CONCESSIONS SEGMENT

According to the revised national list of sites included in the Natura 2000 Network, a small section of the Moreas Motorway Concession is located within or adjacent to the Natura 2000 site «Mount Artemisio and Mount Lyrkeio» (GR2510004), which has been designated as a Special Protection Area (SPA). However, the majority of the motorway section crossing the SPA consists of the Artemisio Tunnel, comprising twin one-way tunnels approximately 1.4 km in length in each direction, allowing traffic to pass underground and thereby minimising surface disturbance.

An Appropriate Assessment has been carried out for the SPA in accordance with Article 6 of the Habitats Directive (92/43/EEC) and the applicable national legislation. Based on the assessment (2016), which evaluated the potential impacts of the project on the conservation objectives of SPA GR2510004, no significant adverse effects were identified on the qualifying species of the site, other protected species listed under Annex I of the Birds Directive (2009/147/EC), or their habitats. Taking into account the location, scale and topographical characteristics of the project, any potential impacts were assessed as either unlikely or negligible. The assessment further concluded that operation of the concession project does not adversely affect the integrity, conservation objectives or ecological coherence of SPA GR2510004 or of the Natura 2000 Network as a whole.

Apart from SPA GR2510004, the concession project lies outside the boundaries of Greece's national protected areas network. Nevertheless, environmentally sensitive features are present both adjacent to and within the wider corridor of the motorway, including urbanised areas and riparian zones. Appropriate environmental requirements are implemented and mitigation measures are applied during the operation and maintenance of the concession, including traffic noise monitoring, ecological monitoring, air quality monitoring, and other environmental monitoring activities, as required.

The Environmental Department, in cooperation with the relevant Operation and Maintenance Departments of MOREAS, continuously monitors and records any observations relating to the presence of protected wildlife species within the concession area. Potential wildlife crossing structures (culverts and other technical structures) are regularly inspected, visual inspections for nests are carried out, particularly in environmentally sensitive areas, and environmental parameters within the project boundaries are routinely monitored.

To date, no incidents involving protected species have been recorded during the operation of the project. This is largely attributable to the underground alignment of the motorway through the Artemisio Tunnel within SPA GR2510004, which preserves the natural topography of the area and allows the uninterrupted movement of wildlife, including protected species.

With regard to flora, vegetation management and the maintenance of planted areas remain an ongoing priority for MOREAS. Existing vegetation along the motorway contributes to enhancing the area's green infrastructure, while the selected plant species are compatible with native vegetation and do not inhibit its natural regeneration or compete with indigenous species.

During the reporting period, maintenance, planting and irrigation works were carried out along the motorway's 200 km central reservation, as well as on verges and at grade-separated interchanges covering approximately 770 km.

At ATTIKI ODOS, landscape management aims to ensure the harmonious integration of the motorway into both the natural and urban environment. As part of the project's environmental permitting requirements, measures have been implemented to safeguard the surrounding environment, with particular attention given to environmentally sensitive ecosystems and protected areas. These include residential zones crossed by the motorway, the Mavri Ora area, the Mornos aqueduct, the Mesogeia area, the Chalandri Stream, and other watercourses within the wider project area.

During 2024, maintenance activities were carried out for approximately 800,000 trees and shrubs and 78,000 m² of turf. To support healthy vegetation growth, 20,600 kg of inorganic fertilisers were applied, while the use of plant protection products was kept to a minimum, with preference given to mechanical vegetation control (cutting and removal).

Furthermore, pruning residues and other green waste were processed using dedicated wood chippers to produce organic material, which was subsequently used as organic mulch and as feedstock for compost production.

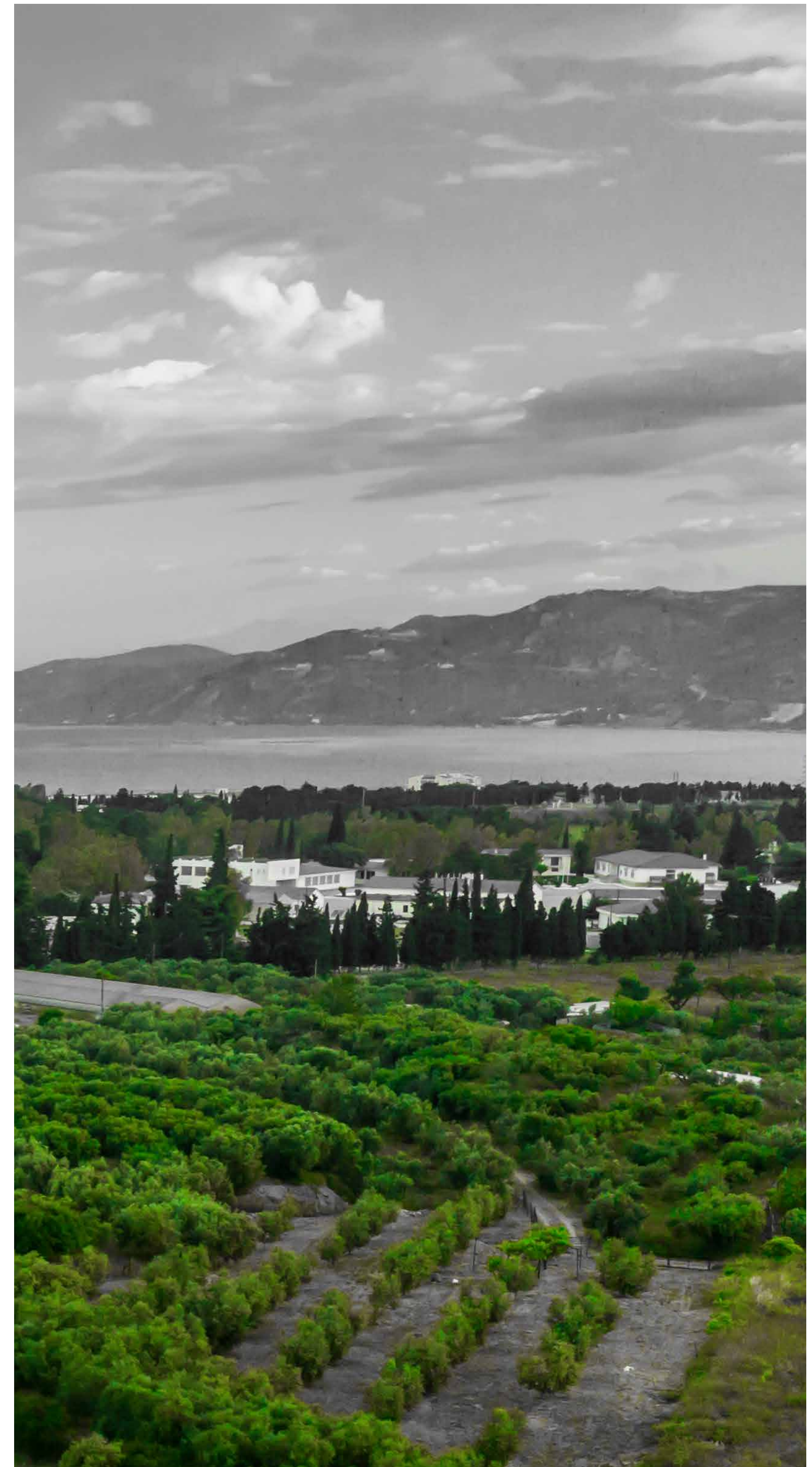
To protect local wildlife, special wildlife fencing has been installed along the motorway to prevent wild and stray animals from entering the carriageway. In addition, bird collision markers have been installed on transparent noise barriers in accordance with international standards to reduce the risk of bird strikes.

ATTIKI ODOS and ATTIKES DIADROMES also collaborate with the ANIMA Wildlife Protection and Care Association for the rescue and rehabilitation of wild animals and birds that may enter the motorway, as well as with specialised service providers for the care and management of stray animals.

ENVIRONMENT SEGMENT

The projects undertaken by the Environmental segment are aimed at protecting and conserving biodiversity and natural habitats through the strict implementation of environmental permit conditions and compliance with the requirements established by the competent authorities.

In particular, through its landfill restoration projects, HELECTOR actively contributes to the reintegration of former landfill sites into the natural environment and to the conservation of local biodiversity. One of the key stages in the lifecycle of a landfill is its environmental restoration once it reaches its permitted waste disposal capacity.



During the restoration phase, the site is rehabilitated through the planting of native forest species adapted to the area's natural and ecological conditions, thereby supporting environmental regeneration and the restoration of ecological balance.

The Arnaia Landfill is located within a Natura 2000 site designated as the Special Protection Area (SPA) "Koroneia–Volvi Lakes, Rentina Pass and the Wider Area" (GR1220009). The central part of this SPA overlaps with the Special Area of Conservation (SAC) "Volvi and Lagadas Lakes and the Wider Area" (GR1220001), which covers an area of 26,966.7 hectares.

To the east of SAC GR1220001 lies the Special Area of Conservation (SAC) "Rentina Pass and the Wider Area" (GR1220003), covering 2,905.16 hectares, part of which overlaps with SPA GR1220009. Furthermore, the SPA borders SAC GR1270005 "Mount Stratoniko and Skamni Peak" to the east and SAC GR1270001 "Mount Cholomontas" to the south.

An environmental study has been approved for the project, confirming that its implementation complies with the applicable requirements for the protection of the natural environment and biodiversity.

Society

Alignment with the Sustainable Development Goals

Alignment with the Principles of the United Nations Global Compact

MAIN ACHIEVEMENTS

SDGs Coffee Breaks

Launch of the "SDGs Coffee Breaks" programme to raise employee awareness of the 17 United Nations Sustainable Development Goals (SDGs)

Implementation of a Human Rights Due Diligence process

Ongoing long-term partnerships with organisations supporting local communities

Support for the "GREEN FUTURE" environmental education programme in schools

OUR PERFORMANCE

49% at ELLAKTOR S.A. & **71%** at REDS S.A.
women employees

86% of employees & **87%** of management personnel
recruited from local communities

873
H&S toolbox talks

2,156
of Occupational Health and Safety training

€1.3 million
invested in local communities

Health, Safety & Employee Development

One of the Group's strategic priorities is the Health, Safety and Development of its employees and business partners. Recognising the well-being and development of its people as a key priority, the Group designs and implements a range of initiatives and actions aimed at the continuous enhancement of employees' knowledge and skills, while ensuring a healthy and safe working environment and strengthening its Health and Safety culture, with the objective of achieving zero accidents.

Action Plan

To achieve its strategic objectives relating to the Health, Safety and Development of its employees, the Group has developed the following action plan:

Action	Status
Design and implementation of a holistic employee well-being programme	In progress
Diversity, Equity & Inclusion Policy	Completed
Programme to enhance the inclusion of vulnerable groups through recruitment	In progress
Design and implementation of Human Rights Due Diligence actions	Completed
Monitoring and evaluation of key performance indicators (KPIs) to identify and track pay gaps	In progress
Assessment of employee remuneration based on relevant studies to ensure the provision of an adequate living wage	In progress
Women's empowerment programme	In progress
Implementation of the 360 Feedback evaluation process	In progress
Extension of ISO 45001:2018 Occupational Health and Safety Management System certification to 100% of the Group's projects	In progress
100% internal Health and Safety audits across the Group's projects	In progress
Health and Safety audits of critical business partners	In progress
Annual privacy training programme	In progress

In progress
Completed

Workforce

For ELLAKTOR Group, its people are its most important competitive advantage. The Group invests in fostering a safe, fair and inclusive working environment, promoting the well-being of all its employees. It establishes the appropriate structures and conditions to support their learning, development and recognition, while providing equal opportunities and promoting diversity and equity.

At the same time, the Group further enhanced its processes in line with the principles of its Human Resources Policy, with the aim of ensuring equal access to opportunities and improving internal communication across all countries in which the Group operates, using languages understood by its employees.

In 2024, the Group employed 1,585 people from a wide range of academic and professional backgrounds. The Group is committed to continuously improving its people management practices through the adoption of international best practices and modern monitoring systems applied across all levels of the organisation.

The geographical distribution of the Group's own workforce is presented in the chart below.

Own Workforce (31.12.2024)

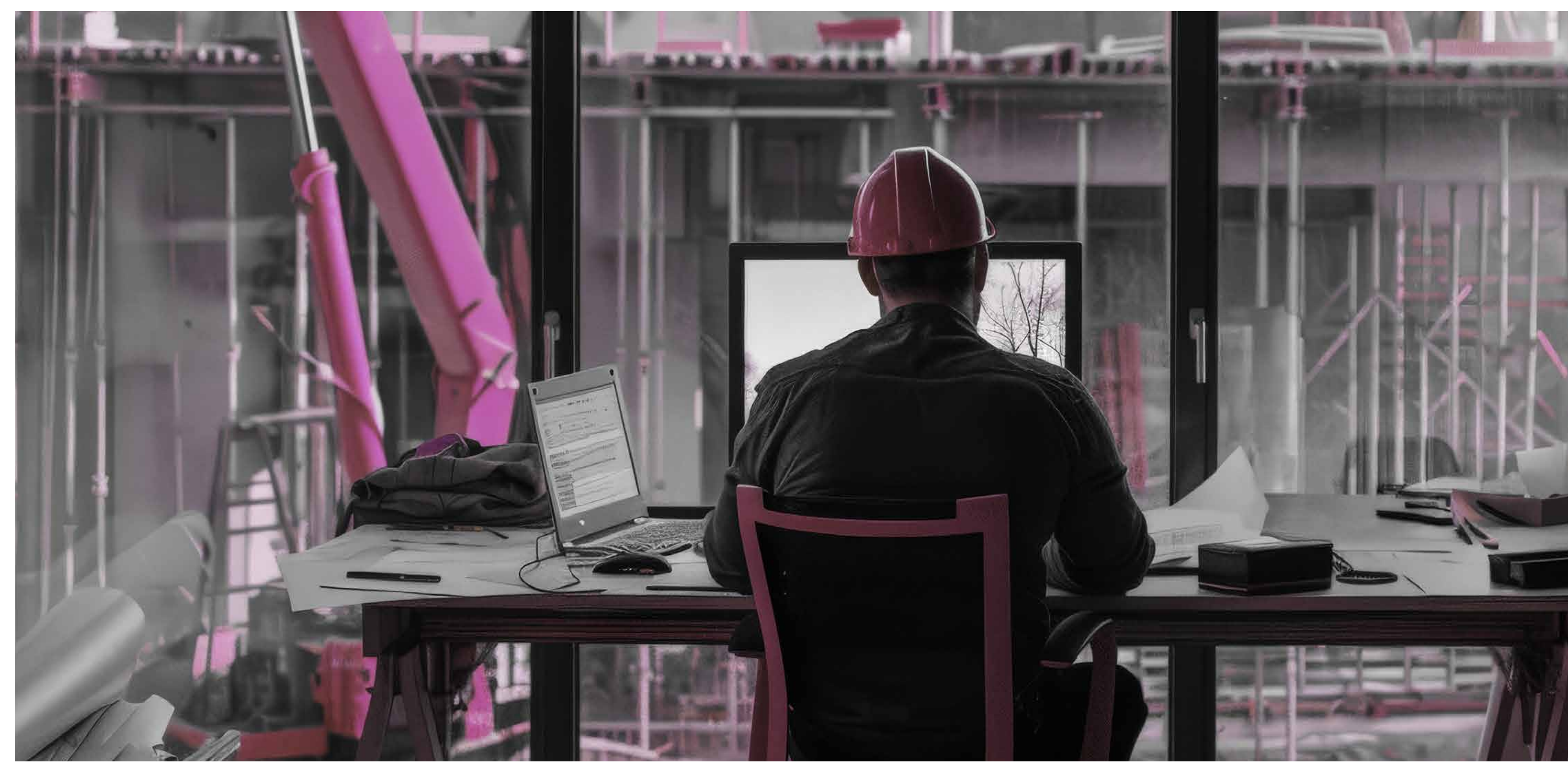
Employment

As of 31 December 2024, the total number of the Group's own workforce amounted to 1,585 individuals, comprising 1,194 men (75%) and 391 women (25%). More specifically, as of 31 December 2024, the total number of the Group's employees amounted to 1,422, comprising 1,057 men (74%) and 365 women (26%). In addition, the total number of non-employee workers within the Group's own workforce amounted to 163, comprising 137 men (84%) and 26 women (16%). All non-employee workers within the Group's own workforce were self-employed workers.

As of 31 December 2024, the Group employed 1,561 permanent employees (1,186 men and 375 women) and 24 temporary employees (8 men and 16 women). "Permanent employees" are employees engaged under indefinite-term employment contracts with the Group, while "temporary employees" are employees engaged under fixed-term employment contracts for a predetermined period.

The Group's policy is to employ its workforce primarily under indefinite-term employment contracts. However, fixed-term employees are recruited when necessary to meet temporary business needs and support the execution of the Group's projects.

It should be noted that the Group's companies give priority to recruiting employees from the local communities in the wider regions where their projects are carried out. Indicatively, 86% of the Group's employees and 87% of its managers originate from the local communities in which the Group operates.



ELLAKTOR Group Workforce Data

1,585
Total workforce

Men
1,194
75%

Women
391
25%

1,561
Permanent employees
1,186 (76%) | 375 (24%)

331
Employees at Headquarters
182 (55%) | 149 (45%)

24
Temporary employees
8 (33%) | 16 (67%)

1,254
Field-based employees (projects and operations)
1,012 (81%) | 242 (19%)

1,558
Full-time employees
1,181 (76%) | 377 (24%)

1,442
Employees in Greece
1,065 (74%) | 377 (26%)

27
Part-time employees
13 (48%) | 14 (52%)

143
Employees abroad
129 (90%) | 14 (10%)

Employees by Age Group

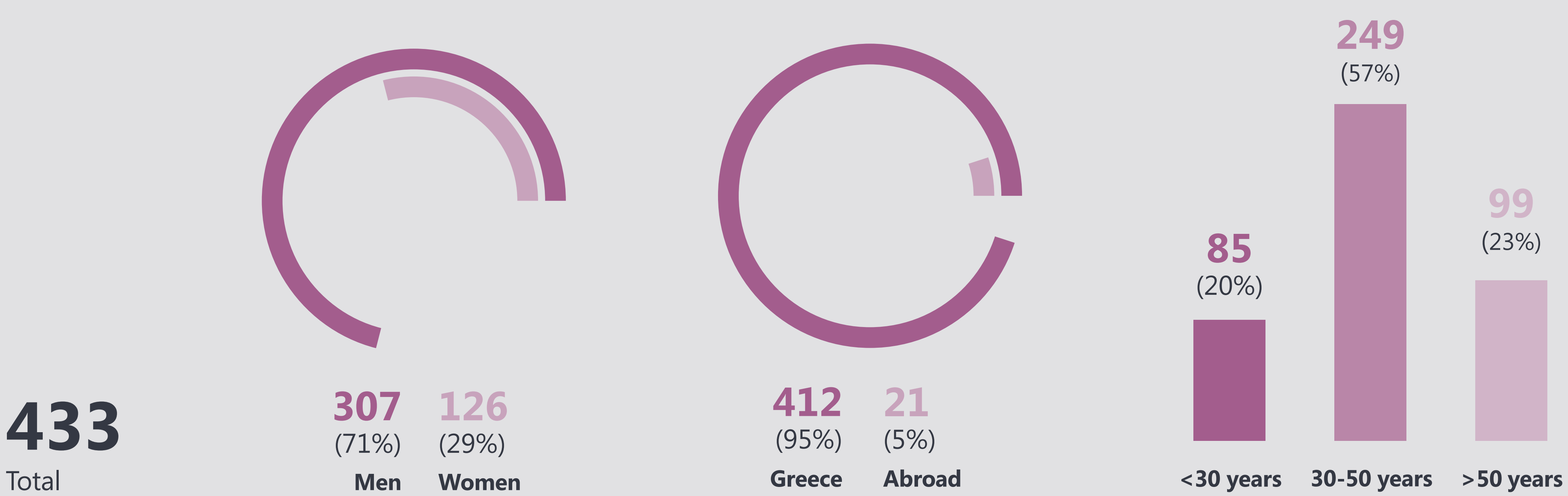
94 — 6% — <30 years

909 — 57% — 30-50 years

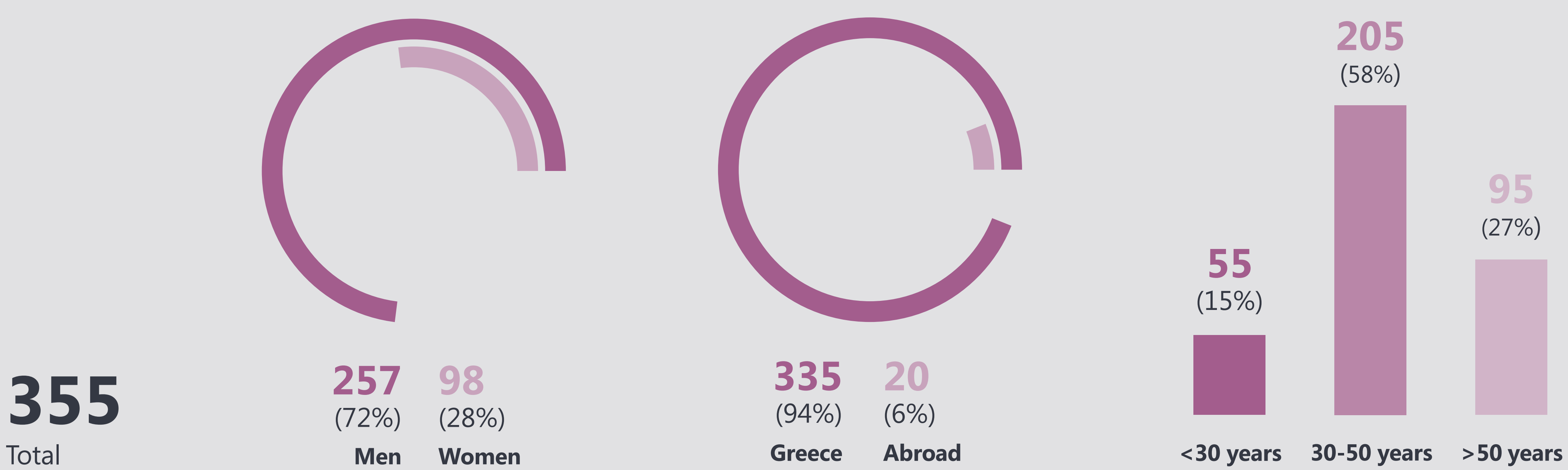
582 — 37% — >50 years

	Total	<30 years	30-50 years	>50 years
Full-time, permanent employees	**1,535**	90 (6%)	878 (57%)	567 (37%)
Part-time, permanent employees	**26**	1 (4%)	11 (42%)	14 (54%)
Full-time, temporary employees	**23**	3 (13%)	19 (83%)	1 (4%)
Part-time, temporary employees	**1**	0 (0%)	1 (100%)	0 (0%)
Employees in Greece	**1,442**	74 (5%)	837 (58%)	531 (37%)
Employees abroad	**143**	20 (14%)	72 (50%)	51 (36%)

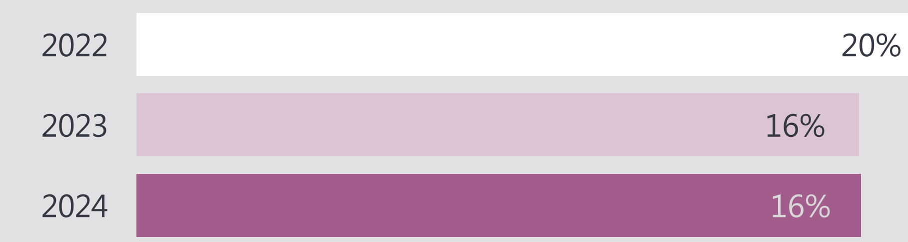
Employee Hires



Αποχωρήσεις Εργαζομένων



Employee Turnover



Voluntary turnover rate

Involuntary turnover rate

Note: The turnover rates have been calculated using the total number of workers who left the Group during the reporting period (employees and non-employee workers) divided by the average number of workers during the year. The voluntary turnover rate includes voluntary resignations and retirements, while the involuntary turnover rate includes dismissals and departures due to the expiry of fixed-term employment contracts.

The total number of employee departures includes employees of ATTIKES DIADROMES, as well as non-employee workers.

Compared to 2023, the proportion of women employees at ELLAKTOR S.A. remained stable at 49%, while at REDS the corresponding proportion increased to 71%, representing an increase of 14 percentage points. With regard to employee hiring, it is worth noting that the employee hiring rate increased by 20% in 2024 compared with 2023. Finally, employee turnover remained broadly in line with 2023 levels, with a slight decrease in the voluntary turnover rate.

Employee Attraction and Retention

The Human Resources Division designs and implements targeted initiatives to retain employees and attract new talent, thereby making a significant contribution to enhancing the Group's overall performance and long-term sustainability.

ELLAKTOR Group recognises the risks associated with the failure to provide equal career advancement opportunities and competitive remuneration and benefits, which may lead to the loss of experienced and skilled employees or to reduced workforce performance.

The Group aims to mitigate these risks through policies and procedures designed to retain existing employees and attract new talent and management personnel. These include performance evaluation processes and a unified remuneration and benefits framework, which ensures compliance with applicable legal requirements while maintaining remuneration at competitive levels in the labour market of each country in which the Group operates. In many cases, the Group also provides remuneration and benefits that exceed statutory requirements.

Employee Performance Evaluation

The Group applies a performance evaluation system tailored to the requirements and specific characteristics of each role. Designed by the Human Resources Division, the system focuses on assessing the specific competencies and behaviours required for employees to perform their day-to-day responsibilities effectively.

The performance evaluation process enables the identification and effective utilisation of employees' competencies, supporting their personal and professional development. At the same time, it promotes open, two-way communication between employees and their line managers.

The employee training plan is developed based on the results of the performance evaluation process. Employees are informed of the commencement of the evaluation process by their line managers, who receive the relevant training from the Human Resources Division.

In 2024, the annual performance evaluation was carried out at REDS and MOREAS SEA. At REDS, 22% of the company's employees participated in the evaluation process (25% of men and 21% of women). At MOREAS SEA, 33% of employees participated (25% of men and 50% of women). The performance evaluation process included employees with at least one year of service with the company.

Employee Remuneration and Benefits

Group Remuneration and Benefits Framework

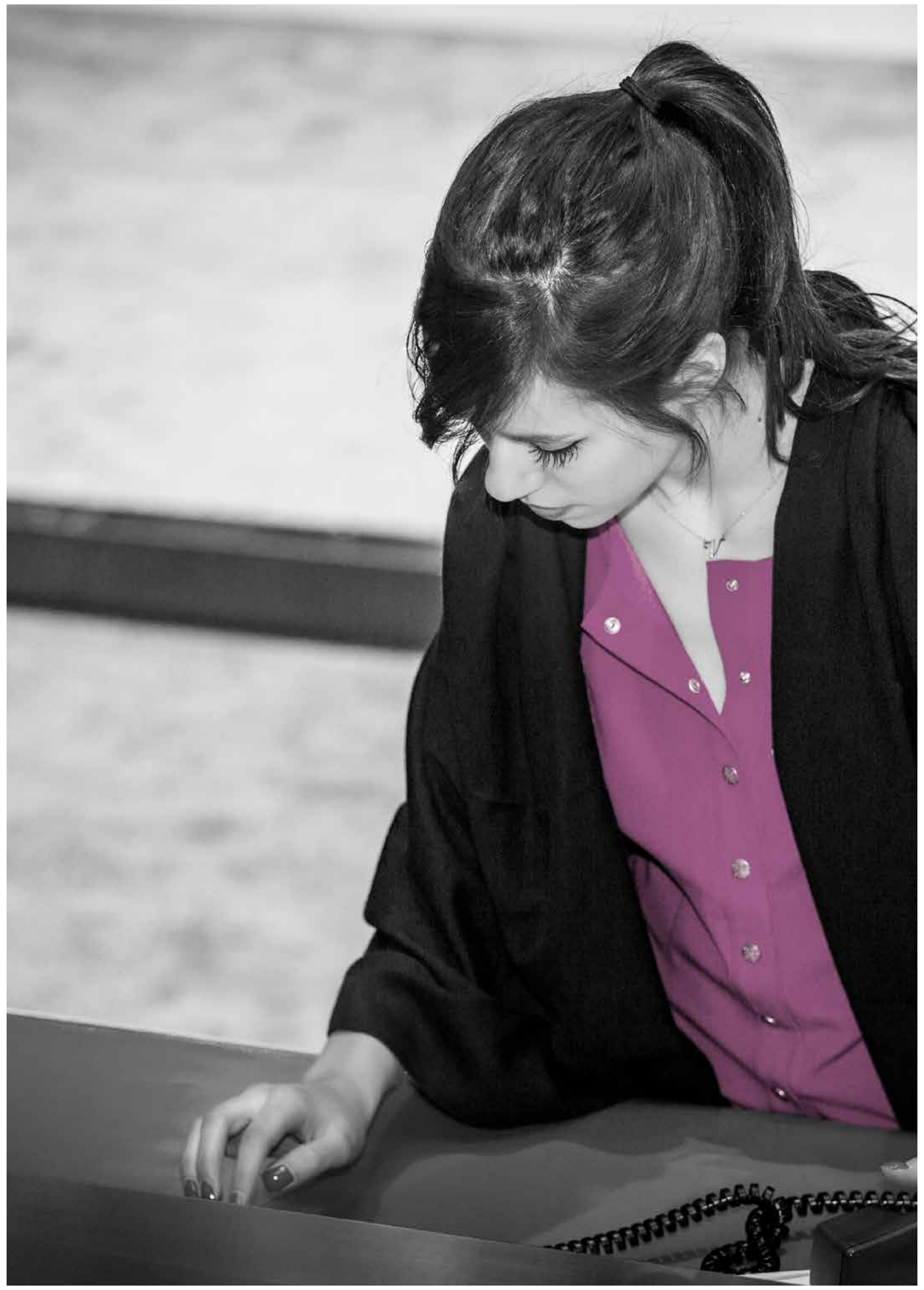
The Group has established a unified remuneration and benefits framework that ensures compliance with applicable legal remuneration requirements while supporting the attraction and retention of qualified personnel through competitive remuneration. Guided by the principles of its Human Resources Policy and Human Rights Policy, the Group ensures equal pay for equivalent qualifications and work of equal value, irrespective of race, sex, colour, nationality, ethnic origin, social background, religion, age, disability, marital status, sexual orientation, gender identity, political beliefs or any other form of discrimination. The Group's remuneration practices are approved by the Chief Executive Officer (CEO) and communicated to all employees.

Remuneration Competitiveness Assessment

The Group participates in remuneration and benefits surveys to assess its market positioning. This process supports the implementation of corrective actions aimed at improving employee retention and enhancing the competitiveness of the Group's remuneration and benefits. In 2024, the Group reviewed its remuneration and benefits levels to address any identified discrepancies and further strengthen their market competitiveness.

Minimum Remuneration

All employees of ELLAKTOR Group are paid at least the applicable statutory minimum wage, or above, in the country in which they are employed.



Benefits Framework

Employee benefits are determined based on the requirements of each role and the corresponding job grade assigned through the Group's job grading system.

The Group provides its employees with group life and health insurance, including medical and pharmaceutical coverage. In addition to employees, their eligible dependants are also entitled to participate in the programme.

It is worth noting that the Group fully complies with applicable labour legislation and, beyond its statutory obligations, voluntarily provides additional benefits as well as other facilities to support employees in the performance of their duties. All employee benefits are governed by dedicated policies.

Within the same framework, the Group's companies voluntarily provide a range of additional benefits, including:

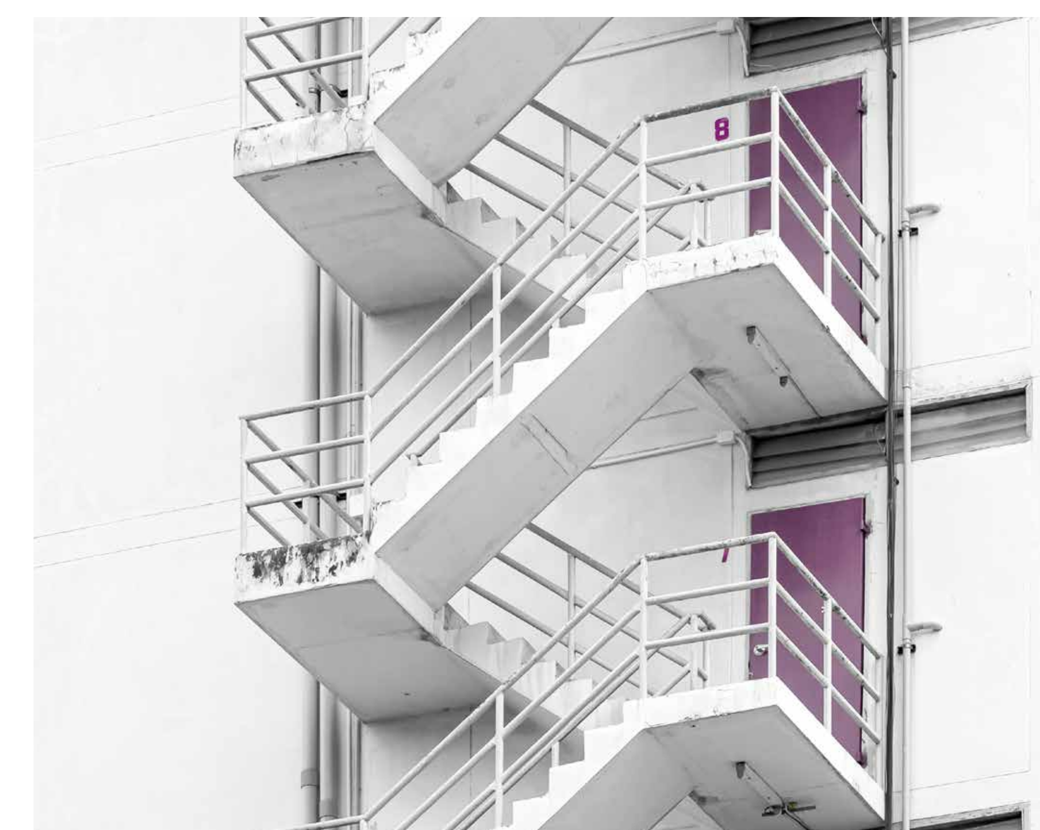
- Company car, fuel card, electronic toll transponder (e.g. e-pass) and mobile phone, depending on the requirements of the position.
- Monthly nursery allowance for employees with pre-school children working in the Group's companies.
- Free transportation by company shuttle bus during arrival and departure hours to and from the Group's corporate offices and selected project sites, facilitating employees' daily commute.
- Employees' children are offered the opportunity to attend summer camps during the summer period, providing additional support to working parents.

Recognising the vital importance of education for future generations, ATTIKI ODOS has established the annual "Dimitris Papamichail" Scholarship. Since 2008, the scholarship has been awarded each year to the son or daughter of an employee of the companies involved in the operation of the motorway who achieves the highest score in the national university entrance examinations for admission to a Higher Education Institution in Greece. In addition, all other eligible candidates receive a laptop to support their academic studies. Through this initiative, ATTIKI ODOS promotes the value of education and supports younger generations in pursuing their educational aspirations, while contributing to sustainable development through education.

Recruitment and Talent Attraction

The Group applies established recruitment procedures to fill vacant positions, seeking to cover vacancies first through internal mobility and subsequently through the recruitment of external candidates. It also continues to participate in student internship and work placement programmes, providing training opportunities to students and creating pathways to permanent employment for young professionals.

As part of its human resources strategy, the Group places particular emphasis on employee development, career progression and continuous learning, as reflected in its internal mobility figures. More specifically, in 2024, 393 employees (309 men and 84 women) moved to other positions within the same business segment, while 66 employees (65 men and 1 woman) transferred to a different business segment. Finally, 121 new positions were created during the year, 12% of which were filled through internal recruitment.



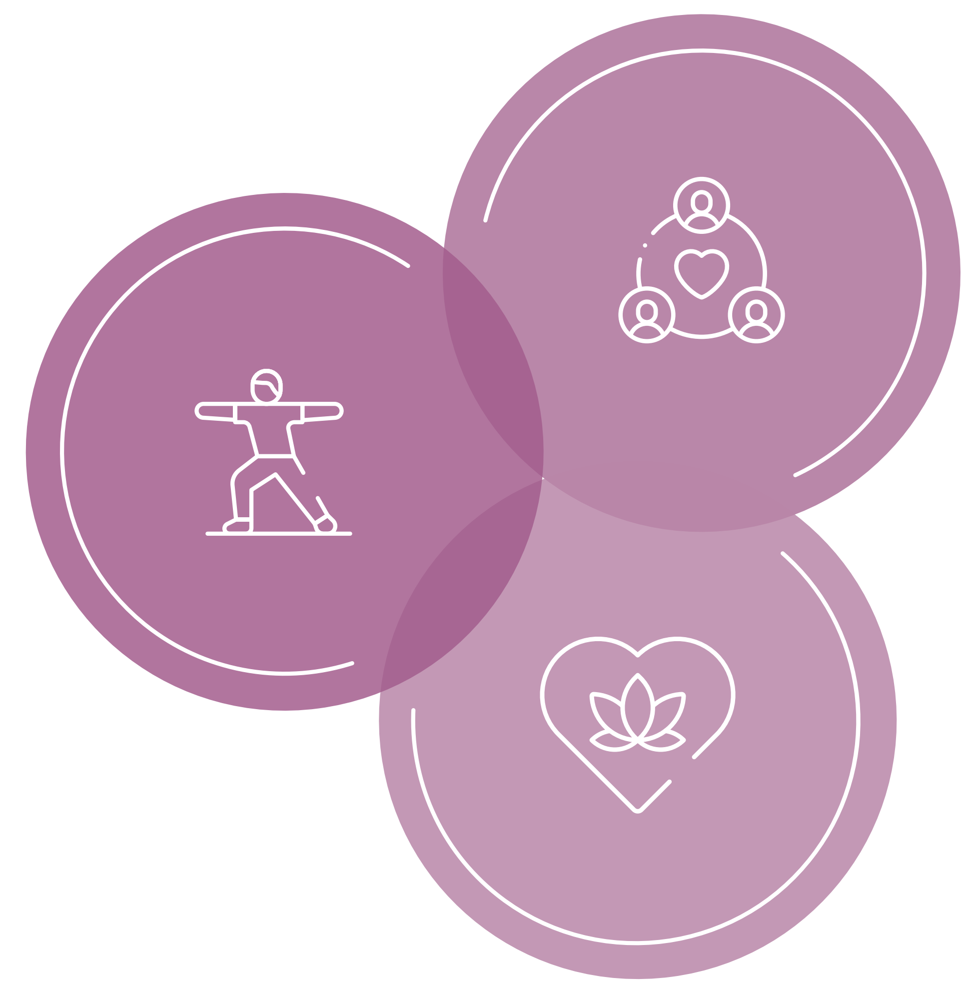
Work-Life Balance and Employee Well-being

ELLAKTOR Group has established the "Living Well" programme as a strategic priority, focusing on the health and well-being of its employees. To develop and implement the programme, the Group has established a dedicated Working Group comprising representatives from various Group divisions, including Human Resources, Strategic Development, Health & Safety, Corporate Communications, and ESG Strategy & Sustainable Development. The programme's initiatives focus on employees' physical, mental and social well-being, promoting a healthy and supportive working environment.

Indicative initiatives already implemented under each of the programme's pillars are presented below:

PHYSICAL WELL-BEING

- In November 2024, the Group participated in the 41st Athens Authentic Marathon, with 34 employees taking part in the 5 km, 10 km, and Marathon races, promoting the importance of physical activity and healthy living.
- An awareness session was held at the Group's headquarters in collaboration with the Hellenic Association of Women with Breast Cancer "Alma Zois". The event was attended by 69 employees, both in person and online.
- For the second consecutive year, employees of ELLAKTOR Group, together with their families, participated in Greece Race for the Cure® 2024, supporting breast cancer awareness and promoting early detection.
- Employees of ELLAKTOR Group were offered preventive cardiac screening (echocardiography) performed by a cardiologist, with 149 employees participating. In addition, the initiative was repeated by the ATTIKES DIADROMES Occupational Health Clinic, with the participation of 310 employees.
- Forty-nine employees at the Group's headquarters participated in a blood pressure screening initiative, which also included awareness activities highlighting the importance of prevention and effective blood pressure management.
- The Group's employee basketball team continued its activities for the second consecutive year, participating in a corporate basketball league. In addition, since 2003, ATTIKES DIADROMES has maintained an employee football team that competes in organised 11-a-side corporate tournaments. The team brings together experienced and younger players and has achieved numerous distinctions and tournament victories over the years.



SOCIAL WELL-BEING

- To mark World Children's Day, a day dedicated to promoting children's rights and well-being worldwide, the Group offered employees and their children up to the age of 13 tickets to theatre performances addressing school bullying and harassment, with the aim of raising awareness and promoting understanding of these issues.
- Volunteer initiatives focusing on environmental protection, inclusion and diversity were organised throughout the year.
- Employees who are parents participated in a conference on promoting healthy screen habits for children, aimed at supporting families in fostering a balanced relationship between children and digital technologies.

MENTAL WELL-BEING

- Since 2022, ATTIKI ODOS has provided a voluntary 24-hour Employee Assistance Programme (EAP) helpline, delivered in collaboration with mental health professionals. The service is available to employees and their families and aims to promote mental well-being by offering confidential counselling and support.

Employee Training and Development

Employee training and development is a key pillar in achieving the Group's strategic objectives. Group-wide training processes have been established to enhance professional knowledge and skills, support continuous learning, and foster a unified corporate culture aligned with the Group's values and principles. Training programmes focus on topics that have been identified as critical to the Group's sustainable growth and long-term success.

The Human Resources Division, in collaboration with the Group's business and functional units, closely monitors employees' training and development needs, ensuring that they are equipped to meet the requirements of their roles and keep pace with developments in their respective fields. The Group also encourages employees to participate in conferences and makes extensive use of its e-learning platform to facilitate broad participation in remote training programmes.

The Group's training initiatives include programmes designed for all employees, with the aim of transferring knowledge and enhancing skills. Training is delivered through general and specialised programmes, tailored to employees' roles and career development plans, as determined through the annual performance evaluation process. The effectiveness of training is assessed through employee feedback questionnaires, supporting the continuous improvement of the Group's training programmes.

For the members of the Board of Directors, the Human Resources Division designs and implements an annual training programme in collaboration with the Nomination and Suitability Committee.

In 2024, the Group delivered a total of 4,709 training hours, corresponding to an average of 3 hours per employee (5 hours per woman employee and 1.7 hours per man employee), representing a 55% decrease compared with 2023. Of the total training hours, 21% were provided to employees in management positions and 79% to non-management employees.

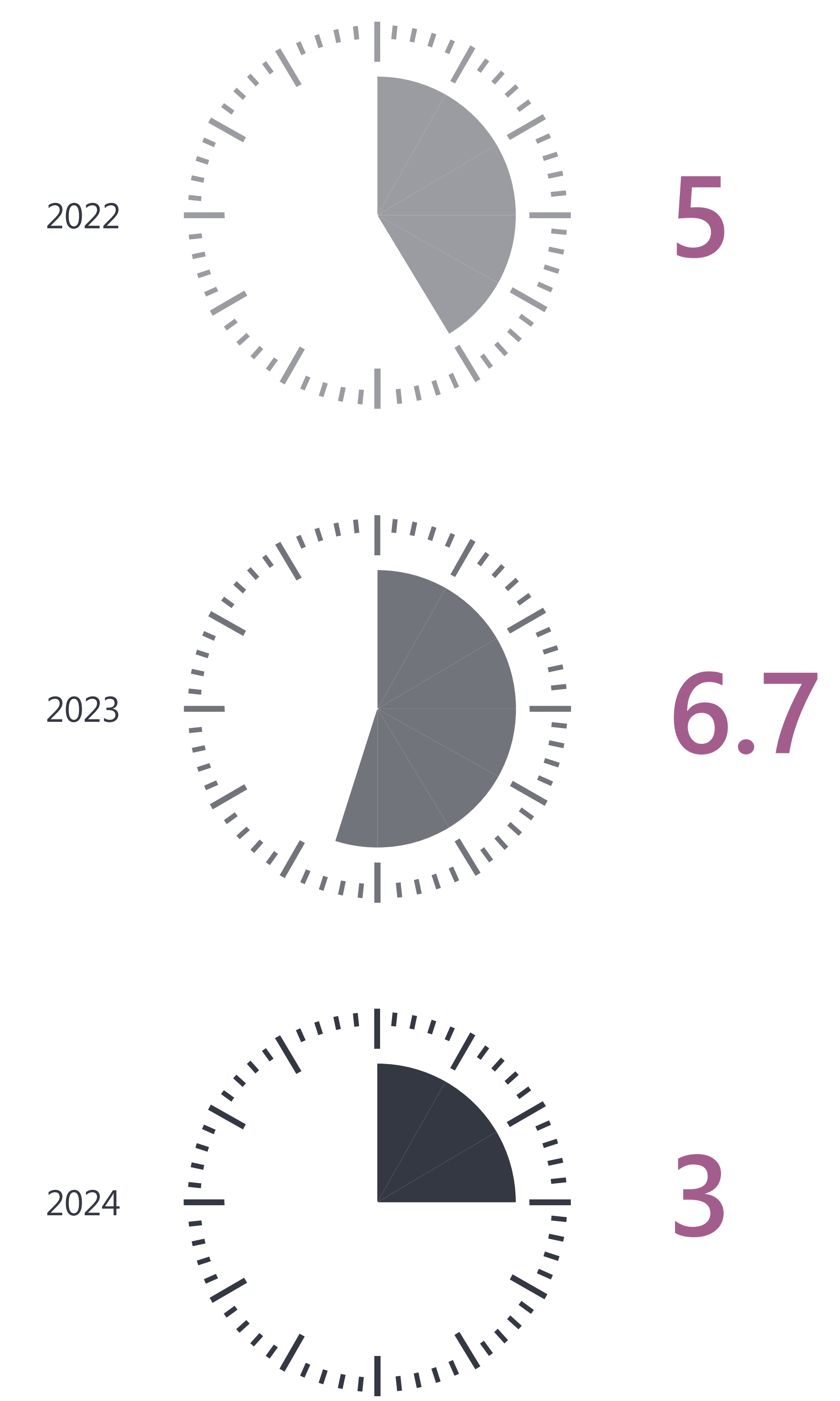
Employees of ELLAKTOR S.A. participated in a wide range of training initiatives, with an average of 18 training hours per employee, representing an increase of one percentage point compared with 2023. Total expenditure on employee training amounted to €52,147.

Training on ESG and Sustainable Development

In 2024, the ESG Strategy & Sustainable Development Division, in collaboration with the Human Resources Division, continued its employee training and awareness programme on Sustainable Development, delivering a total of 639 training hours with the participation of 212 employees. At the beginning of 2024, the "SDGs Coffee Breaks" initiative was launched as part of the Group's new "Whole Living" Corporate Social Responsibility (CSR) programme, in collaboration with Wise Greece, to raise employees' awareness of the 17 United Nations Sustainable Development Goals (SDGs). The ESG Strategy & Sustainable Development Division also leverages international and global observance days to share awareness messages with employees, promoting greater understanding and engagement with Sustainable Development issues.

The training programmes aimed to strengthen the Group's contribution to environmental and social sustainability, while enhancing the Board of Directors' understanding of its role in addressing climate change and advancing the Sustainable Development Agenda.

Average training hours



Training by Topic

Number of Employees	Training Hours 2024	Percentage	Training Topic
19	29	0.6%	Leadership / Management
83	185.2	3.9%	Information Technology / Digital Skills
102	92.68	2%	Compliance
542	2,156.43	45.8%	Health & Safety
317	608.48	12.9%	Environment & Energy
47	197	4.2%	Operational / Technical Topics
1	1	0%	Quality
16	64.5	1.4%	Diversity, Equity & Inclusion (DE&I)
212	638.5	13.6%	Sustainable Development / ESG
44	22.5	0.5%	Risk Management
105	180.5	3.8%	Human Rights
120	533.29	11.3%	Other Topics*
Σύνολο	**4,709.08**		

**Other topics include Corporate Governance, Logistics and Entrepreneurship.*

Safeguarding Human Rights

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

Given its international presence, the Group employs a significant number of workers across its projects and operations, both directly through its own workforce and indirectly through its business partners. Although legal and labour frameworks may vary considerably from one country to another, ELLAKTOR Group recognises its responsibility to safeguard the rights of individuals and local communities that may be affected by its projects and operations. To ensure this, the Group is committed to implementing a common set of human rights principles and guidelines across all its companies and in every country in which it operates.

Taking into account the nature of its activities and its value chain, ELLAKTOR Group has identified a number of human rights-related issues that may give rise to significant adverse impacts on its operations, business relationships and stakeholders. The issues presented below have been identified by ELLAKTOR Group as particularly significant from a human rights perspective. In addition, the Group continues to assess other relevant human rights issues that may emerge.

Material Human Rights Issue	Potentially Affected Stakeholders	Actions to Address Impacts
Health, Safety and Well-being	▸ Group employees ▸ Suppliers and other business partners ▸ Local communities	Occupational Health & Safety Work-Life Balance and Employee Well-being Social Responsibility
Discrimination (gender, nationality, sexual orientation, disability, age, etc.)	▸ Group employees ▸ Suppliers and other business partners ▸ Local communities	Employment Diversity, Equity & Inclusion (DE&I) Safeguarding Human Rights Compliance
Harassment and Bullying	▸ Group employees ▸ Suppliers and other business partners	Diversity, Equity & Inclusion (DE&I) Safeguarding Human Rights Compliance
Remuneration	▸ Εργαζόμενοι του Ομίλου ▸ Προμηθευτές και Επιχειρηματικοί Συνεργάτες	Απασχόληση Προάσπιση των Ανθρωπίνων Δικαιωμάτων Διαφορετικότητα, Ισοτιμία & Συμπερίληψη Κανονιστική Συμμόρφωση
Working Hours	▸ Group employees ▸ Suppliers and other business partners	Safeguarding Human Rights Employment Compliance
Human Rights Affected by Climate Change	▸ Group employees ▸ Suppliers and other business partners ▸ Local communities and society at large	Safeguarding Human Rights Social Responsibility Climate Change Adaptation

ELLAKTOR Group implements a human rights due diligence process in accordance with the guidance provided in the Final Report on Minimum Safeguards published by the Platform on Sustainable Finance.

Step 1

Embed Responsible Business Conduct into Policies and Management Systems

With regard to safeguarding human rights, the Group has adopted and implements the following policies:

- Human Resources Policy
- Policy on the Prevention and Combating of Harassment in the Workplace
- Diversity, Equity and Inclusion (DE&I) Policy
- Health & Safety Policy

These policies set out the Group's commitment to the principles of the Universal Declaration of Human Rights, 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 (ILO) Declaration on Fundamental Principles and Rights at Work, including ILO Convention No. 87 (Freedom of Association and Protection of the Right to Organise) and ILO Convention No. 98 (Right to Organise and Collective Bargaining). In accordance with the Group's Human Rights Policy, the provision of equal opportunities constitutes a mandatory principle throughout the Group's operations.

In addition, both the Group and its employees are protected by the provisions of the Group's Code of Conduct, which employees acknowledge and sign upon recruitment. The Code of Conduct is also contractually binding on the Group's business partners through the agreements entered into with them. The Group provides remuneration in full compliance with all applicable legislation and industry standards, without discrimination on the grounds of race, sex, colour, nationality, ethnic origin, social background, religion, age, disability, marital status, sexual orientation, gender identity, political beliefs or cultural beliefs. Furthermore, the Group complies with all applicable labour legislation governing working hours, work schedules and the payment of all statutory bonuses and allowances.

Further information on the Group's policies, human rights due diligence process, and the monitoring and assessment of policy implementation is available in the Group's 2024 Annual Financial Report, under the section "Policies Related to the Group's Own Workforce [S1-1]", as well as on the Group's website, where these documents are publicly available to all stakeholders. Upon recruitment, every employee is required to acknowledge that they have read, understood and agree to comply with the Group's Code of Conduct and integrity-related policies.

Finally, it is worth noting that the Group is a participant in the United Nations Global Compact and submits its annual Communication on Progress (CoP).

Step 2

Identify and Assess Adverse Impacts

As part of its risk management process, the Group has identified, assessed, rated and classified risks related to human rights. Appropriate controls and mitigation measures have subsequently been established and documented, their effectiveness is regularly evaluated, and the residual risk is assessed. The results are reported on a semi-annual basis to the Strategic Development Division, the Chief Financial Officer (CFO), the Internal Audit Division and the Chief Executive Officer (CEO), and on an annual basis to the Board of Directors.

As part of the Double Materiality Assessment, potential impacts on human rights were also taken into consideration. Where a potential adverse human rights impact was identified, the severity of the impact took precedence over its likelihood, in line with the Group's impact assessment methodology. It is worth noting that Occupational Health & Safety, which constitutes a fundamental human right, was identified as a material topic.

In addition, through the implementation of its Third-Party Due Diligence Policy, the Group monitors integrity risks arising from third parties and assesses their compliance with applicable laws, regulations, standards, corporate values, ESG objectives and other relevant requirements. Further information is available in the section "Value Chain Due Diligence Systems and Procedures" under the Governance chapter.

Step 3

Cease, Prevent or Mitigate Adverse Impacts

- Detailed mitigation measures for these risks are documented in the Group's Risk Register.
- Integrity training is delivered through both in-person sessions and the Group's e-learning platform.
- Internal audits on Occupational Health & Safety (OH&S) are conducted, together with risk identification, assessment and evaluation through Written Occupational Risk Assessments and the implementation of ISO 45001 Occupational Health & Safety Management Systems.
- Due diligence reviews of third parties are performed using a dedicated risk assessment tool.
- A Whistleblowing Policy and Whistleblowing Management Procedure are implemented.
- The Group provides multiple reporting channels, including telephone, e-mail, the Talk2Ellaktor electronic platform and postal mail, through which concerns and reports may be submitted.

The management of these matters follows a cross-functional approach, involving the Human Resources Division, ESG Strategy & Sustainable Development Division, Compliance Division, Risk Management Division, Legal Services and the Internal Audit Division.

Step 4

Track Implementation and Results

- All third parties enter into contractual agreements that include integrity-related provisions.
- The Group monitors relevant key performance indicators (KPIs), including the number of reports received, the number of reports resolved, the number of third parties that have signed agreements containing integrity provisions, and the categorisation of reported cases.
- Third-party monitoring through the dedicated due diligence tool is performed on an ongoing basis. Depending on the nature of any findings or reports, the relevant Group functions—including Human Resources, Compliance, Legal Services, and Health, Safety, Environment & Quality (HSEQ)—are informed and involved, as appropriate.
- The Group implements a Whistleblowing Policy and related reporting procedures, under which the investigation and management of reports constitute an essential process for addressing reported concerns, incidents or allegations, including cases of misconduct, security breaches or any other relevant matters.

Step 5

Communicate How Impacts Are Addressed

The Group implements a range of employee engagement and communication mechanisms aimed at promoting transparency, building trust and encouraging the active involvement of employees in matters relating to human rights and working conditions. These include:

- Regular consultations with employees.
- Training programmes focusing on human rights, diversity, the prevention of discrimination, and the promotion of an inclusive workplace.
- Toolbox talks, incident investigation meetings, and regular meetings between Health & Safety Officers and the Group's central functions.
- Alternative reporting channels (whistleblowing mechanisms), through which employees can safely and confidentially report alleged human rights violations or inappropriate conduct.
- An internal risk assessment system, which includes the identification and assessment of potential violations of labour and human rights.

In this context, through its Human Rights Policy, the Group is committed to safeguarding the rights to freedom of association and collective bargaining. It ensures that employees who are members of trade unions are not subject to any form of intimidation, discrimination or harassment and promotes constructive dialogue with lawfully elected employee representatives based on mutual respect and good faith.

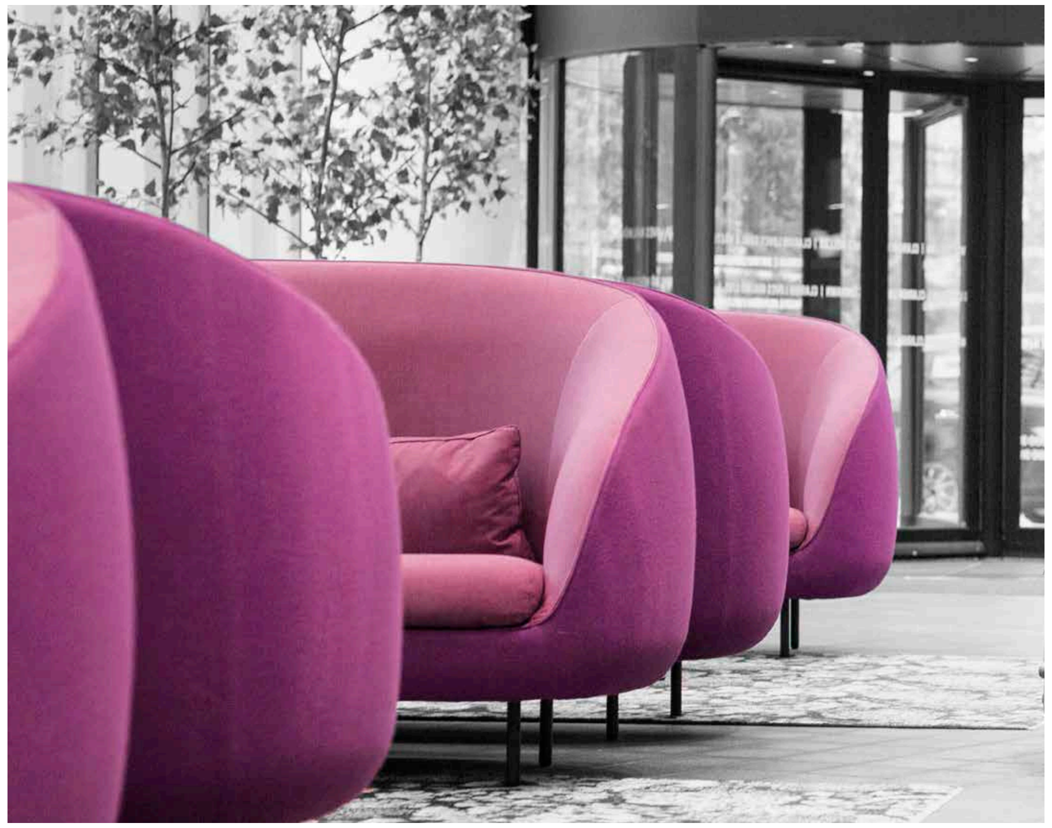
It is worth noting that 88% of the Group's employees are covered by the national collective bargaining agreements applicable in the countries in which the Group operates. In addition, all individuals employed by the Group are at least 18 years of age.

Further information is available in the Group's 2024 Annual Financial Report, under the section "Processes for Engaging with the Group's Own Workforce and Workers' Representatives on Impacts [S1-2]".

Step 6

Provide for or Cooperate in Remediation

To enable the reporting of potential violations of the Code of Conduct, the Group's policies and applicable legislation, the Group has implemented a Whistleblowing Policy and a Whistleblowing Management Procedure. Further information is available in the Group's 2024 Annual Financial Report, under the section "Processes for Engaging with the Group's Own Workforce and Workers' Representatives on Impacts [S1-2]".



Policy on the Prevention and Combating of Harassment in the Workplace

The Group has adopted a Policy on the Prevention and Combating of Harassment in the Workplace, demonstrating its commitment to zero tolerance for all forms of violence and harassment in the workplace. The purpose of the Policy is to establish and maintain a working environment that respects, promotes and safeguards human dignity, while ensuring every individual's right to a workplace free from all forms of violence and harassment. To support the implementation of the Policy, the Group has developed a dedicated e-learning course through which employees are trained on the concepts of workplace violence and harassment, as well as on the available reporting and complaint mechanisms. Of the employees who have completed the course, 39% are management employees, who receive additional guidance on effectively addressing incidents of bullying or harassment.

In 2024, the Group delivered a three-hour training programme on the prevention of violence and harassment in the workplace for all employees, which continued into 2025. During 2024, a total of 91 training hours were delivered on these topics. In addition, to mark the International Day for the Elimination of Violence against Women on 25 November 2024, ELLAKTOR Group organised an introductory women's self-defence workshop.

Work-Life Balance

With regard to family-related leave, the Group fully complies with the provisions of applicable labour legislation. Among other measures, employees with caregiving responsibilities may request flexible working arrangements, including remote working, flexible working hours or part-time employment, as well as additional leave for reasons such as caring for children with serious medical conditions, undergoing medically assisted reproduction procedures, or attending prenatal medical examinations.

In 2024, 36 employees (22 men and 14 women) across ELLAKTOR Group were entitled to maternity or paternity leave, and all eligible employees made use of their entitlement. One hundred per cent (100%) of employees who were expected to return from parental leave returned to work as planned. In addition, the 12-month retention rate for employees returning from parental leave was 100%. Employees who did not remain with the Group after returning from parental leave left voluntarily, either due to the expiry of a fixed-term contract or resignation.

As a result of the above policies and practices, no confirmed incidents involving the infringement or violation of human rights were reported to either the Human Resources Division or the Compliance Division during 202.

Diversity, Equity & Inclusion

Ensuring equal opportunities, as one of the Group's core values, lies at the heart of its corporate culture. It reflects the Group's belief that a sustainable future can only be achieved by fostering an environment in which diversity is encouraged and valued, and where dignity, equity and inclusion are promoted both in the workplace and in the wider community. At ELLAKTOR Group, fostering a workplace that embraces and promotes diversity, equity and inclusion enables the Group to respond effectively to evolving challenges, strengthen employee engagement, stimulate creativity and innovation, and ultimately support sustainable growth and long-term value creation.

Diversity, Equity & Inclusion (DE&I) Policy

To achieve these objectives, the Group has adopted and implements a Diversity, Equity & Inclusion (DE&I) Policy, which sets out the Group's core principles relating to diversity, equity and inclusion. The Policy also describes the relevant governance documents and outlines the Group's commitments to fostering and maintaining a diverse, equitable and inclusive workplace. Oversight of the implementation of the Policy, as well as the monitoring of the related Group-wide performance indicators, is the responsibility of the Group Sustainability Committee. In addition, the Group encourages initiatives that promote respect, equal opportunities and an inclusive workplace, ensuring a fair and equitable working environment.

Embedding the Policy into the Group's Strategy and Training

To further strengthen its corporate culture in these areas, the ESG Strategy & Sustainable Development Division, in collaboration with the Human Resources Division and the Corporate Communications Division, designed a comprehensive training programme on Diversity, Equity & Inclusion (DE&I). The programme, which was approved by the competent Committee, is intended both for management employees and team leaders, as well as for all employees across the Group.

Since 2023, ELLAKTOR Group has been a signatory of the Diversity Charter Greece, supporting the European Commission's initiative to promote diversity and equal opportunities in the workplace.

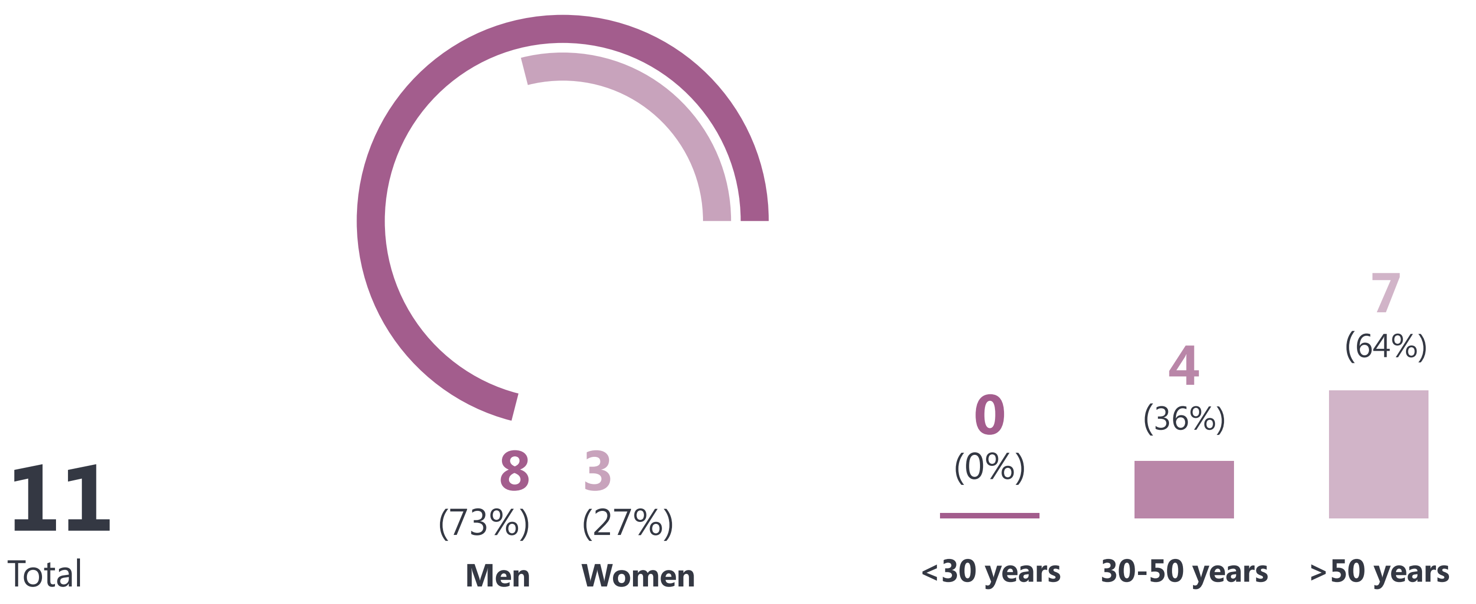
Furthermore, during 2024, as part of the approved programme to strengthen the Group's corporate culture on Diversity, Equity & Inclusion, management employees participated in Unconscious Bias training. The programme aimed to increase awareness of unconscious bias and support its identification and mitigation, both in the workplace and in everyday life.

ELLAKTOR Group is committed to promoting the principles of Diversity, Equity & Inclusion and to further embedding these principles across its corporate governance framework through its Code of Conduct, Business Partners Code of Conduct, Human Rights Policy, and Human Resources Policy. The Group also seeks to extend these principles throughout its value chain through the Business Partners Code of Conduct, which forms the foundation of its relationships with business partners. Further information on the Group's policies and codes is available on the Group's website.

Women's Empowerment

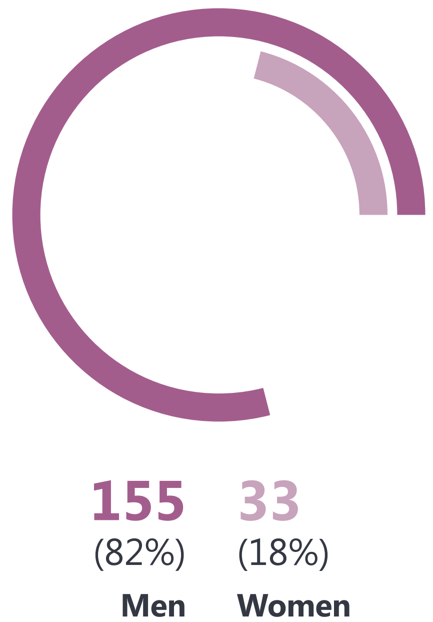
ELLAKTOR Group has also signed the Women's Empowerment Principles (WEPs), a global initiative established by UN Women and the United Nations Global Compact to advance gender equality and women's empowerment in the workplace, the marketplace and the wider community. At ELLAKTOR Group, gender equality is recognised as a fundamental and non-negotiable human right. By becoming a signatory to the Women's Empowerment Principles, the Group reaffirms its commitment to fostering an inclusive workplace free from discrimination and inequality. Through training programmes delivered by UN Women and the United Nations Global Compact, ELLAKTOR Group's executives and employees enhance their knowledge of emerging developments and best practices relating to gender equality in the workplace.

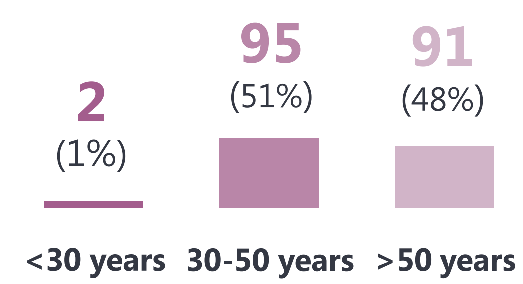
Diversity of Governance Bodies (Board of Directors as at 31 December 2024)



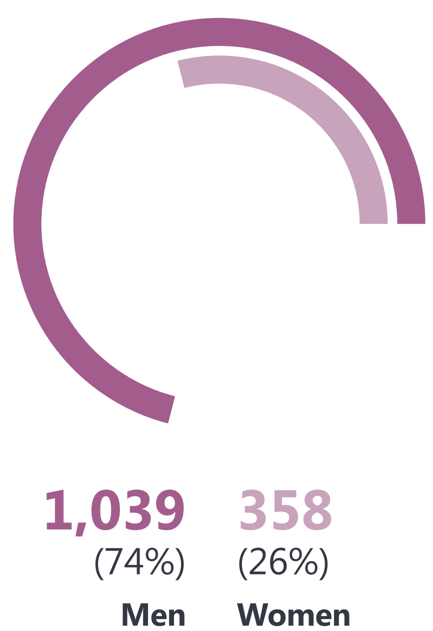
Workforce Diversity

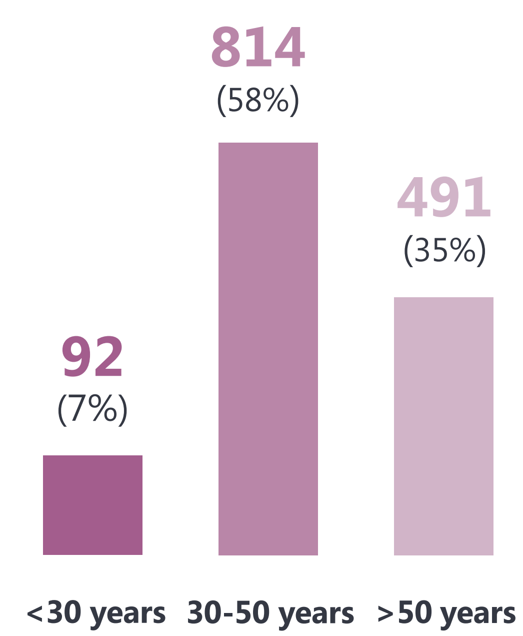
188
Employees in management positions





1,397
Employees in non-management positions



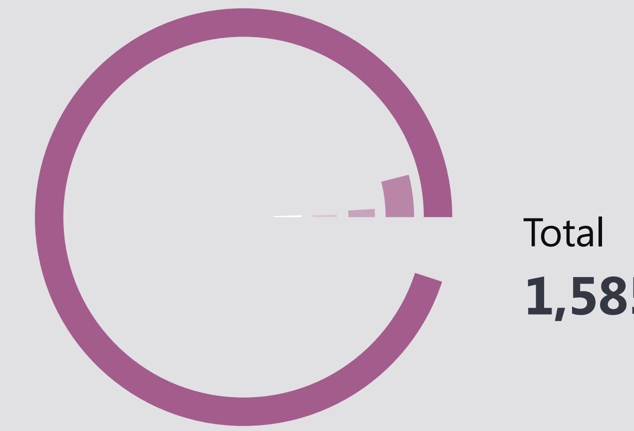


It is worth noting that women represent 56% of the Group's senior executive (C-level) positions.

In 2024, at ELLAKTOR S.A., the ratio of the basic salary of women to men was 1.09. The corresponding ratio was 0.98 for employees in management positions and 1.46 for employees in non-management positions.

In 2024, the Group employed four persons with disabilities (PwDs), representing 0.25% of its workforce, while 13% of the Group's employees had a nationality different from that of the country in which they were employed.

Employees by Race



- White **1,465** - 92%
- Asian **88** - 6%
- Black or African American **32** - 2%
- American Indian or Alaska Native **0** - 0%
- Native Hawaiian or Other Pacific Islander **0** - 0%

In 2024, no incidents of discrimination were reported to the Human Resources Division or the Compliance Division of the Group.

Occupational Health and Safety

Occupational Health & Safety Policy

Safeguarding the health and safety of the Group's entire workforce is an integral part of ELLAKTOR Group's overall business philosophy and strategy, and one of the key factors supporting its sustainable growth and long-term success.

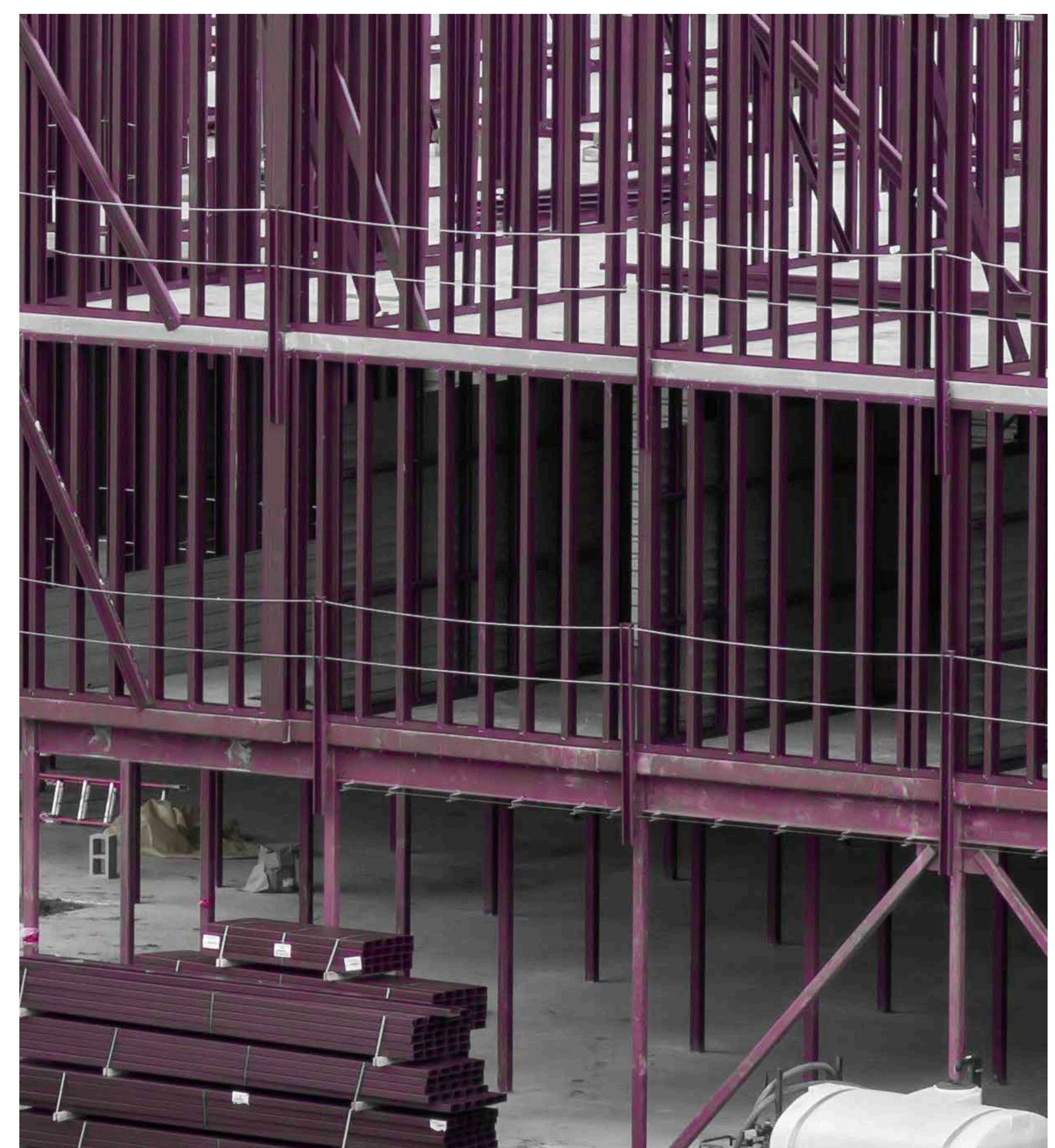
In this context, and in line with the Group's broader philosophy, Management, through the Occupational Health & Safety Policy, is committed to complying with applicable national and European legislation, as well as all other relevant requirements; providing safe and healthy working conditions across all workplaces; and maintaining and continually improving the Occupational Health & Safety Management System to eliminate hazards and reduce occupational health and safety risks. Further information on the Policy is available in the section "Policies Related to the Group's Own Workforce [S1-1]" of the 2024 Annual Financial Report.

The Group aims to minimise and ultimately eliminate workplace accidents across all its operations through the identification and assessment of occupational risks, the implementation of appropriate preventive measures, and the continuous deployment of advanced occupational health and safety tools and practices.

Occupational Health & Safety Management

As part of its commitment to providing a stable, healthy and safe working environment, the Group implements certified Occupational Health & Safety Management Systems in accordance with the international ISO 45001:2018 standard, covering 66% of its projects based on revenue. Further details are provided in the Appendix. All Group companies have developed and implement Occupational Health & Safety Management Systems aligned with this standard, the requirements and procedures of which apply to the Group's entire workforce.

As part of its operations and due diligence processes, the Group identifies and assesses a broad range of occupational health and safety risks, including workplace injuries, occupational diseases, emergency situations (such as fire, earthquakes, floods and hazardous chemical releases), failure to comply in a timely manner with legal and other applicable requirements, failure to identify workplace hazards (including unsafe work practices, inadequate training or non-compliance with the Group's 15 Inviolable H&S Rules), inadequate health and safety performance by third parties (including contractors, suppliers and subcontractors), complaints raised by employees or external business partners, potential regulatory sanctions or reputational impacts, and the potential exclusion of the Group from public or private sector prequalification processes.



To effectively manage and minimise these risks, the Group has implemented a comprehensive range of preventive and mitigation measures, which are described below.

Occupational Health & Safety Governance Structure

For each project, depending on its size and nature, an Occupational Health & Safety Manager is appointed. The OH&S Manager is supported by the central Health & Safety function of the respective subsidiary and is overseen and guided by the Group's Occupational Health & Safety Division. In addition, in accordance with applicable legislation, each project appoints a Safety Technician and/or a Health & Safety Coordinator, depending on the nature of the project.

Across the Group's projects and operations, an Occupational Physician is appointed, where required by law, to monitor employees' health and oversee workplace hygiene and occupational health conditions. In addition, first aid teams are established according to the size and requirements of each project. Where required, an Occupational Physician is also appointed for subcontractors' employees.

Communication and Consultation

Communication and consultation on Occupational Health & Safety (OH&S) matters are carried out through a range of engagement mechanisms, including 15-minute safety meetings (toolbox talks), incident investigation meetings, regular meetings between Occupational Health & Safety Managers and the Group's central functions, monthly meetings between the Health & Safety Managers of the Group companies and the Group's Occupational Health & Safety Division, as well as project-level health and safety meetings. In 2024, a total of 873 pre-work 15-minute OH&S meetings were held. During these meetings, employees discuss the occupational health and safety issues associated with the day's planned activities, with the objective of maintaining a high level of awareness and preventing incidents. This practice also applies to the employees of the Group's subcontractors. Particular emphasis is placed on the 15th of the Group's 15 Inviolable H&S Rules, which states that no employee shall perform any work unless all Occupational Health & Safety requirements and rules are fully met. It should also be noted that the monthly meetings between the Group's Occupational Health & Safety Division and the Health & Safety Managers of the Group companies include the review and investigation of workplace accidents, verification of compliance with internal procedures, and the exchange of Occupational Health & Safety best practices.

Employees across the Group are also provided with the opportunity to participate in Occupational Health & Safety Committees. Among their responsibilities are identifying workplace hazards, submitting recommendations to the appropriate management for their elimination or mitigation, cooperating with and supporting the employer in maintaining a safe working environment, and participating in training and awareness initiatives relating to occupational health and safety. In 2024, five Occupational Health & Safety Committees operated across the Group's projects.

Occupational Health & Safety Management Plans and Written Occupational Risk Assessments

For each project, an Occupational Health & Safety Management Plan and a Written Occupational Risk Assessment (WORA) are prepared, taking into account the nature of the project, the scope and intensity of the activities, and the associated occupational risks. The purpose of the Written Occupational Risk Assessment (WORA) is to identify, recognise and assess all potential occupational hazards, regardless of their type, nature or cause, and to recommend the necessary measures to eliminate or minimise these risks.

Examples of occupational health and safety hazards that have been identified, documented and assessed, depending on the nature of each project's activities, include electric shock, falls from height, moving equipment, moving vehicles and construction machinery, handling of hazardous chemicals, falling objects, use of tools, hot surfaces, manual and mechanical materials handling, and slips, trips and falls.

The Written Occupational Risk Assessment (WORA) is prepared for the Group's projects and operations to ensure that its implementation reduces the likelihood of workplace accidents and occupational diseases across the Group's workplaces. The assessment is based on the hierarchy of controls principle.

Specifically, the Written Occupational Risk Assessment (WORA) includes:

- Identification of workplace hazards and assessment of the risks associated with those hazards using a structured risk assessment methodology. The objective is to identify and document the measures required to protect the health and safety of employees, taking into account the requirements of applicable legislation.
- Risk assessment to determine the most appropriate solutions regarding equipment, workplace organisation and workplace design.
- Training of all employees on the identified occupational health and safety risks.

- Monitoring and evaluation of the effectiveness of the implemented control measures.
- Prioritisation of corrective actions where the assessment indicates that additional control measures are required.
- Ensuring that the preventive measures and working methods implemented following the completion of the Written Occupational Risk Assessment (WORA) contribute to the continuous improvement of the level of occupational health and safety protection provided to employees.

The Written Occupational Risk Assessment (WORA) covers all reasonably foreseeable occupational hazards arising from work activities and from the locations where the Group's projects are carried out, including permanent facilities, changing workplaces, mobile workplaces and temporary worksites. To facilitate the reporting of occupational health and safety concerns, the Group operates the Talk2ELLAKTOR reporting mechanism, which is also accessible through the Group's intranet. Through this platform, employees may report, either anonymously or by name, any occupational health and safety hazards or concerns they identify in the workplace, among other matters. Further information on the reporting process, the management of reports, and the protection of both reporting persons and persons concerned is available in the Group's Whistleblowing Policy.

Occupational Health & Safety Training

To ensure that employees are well informed on Occupational Health & Safety (OH&S) matters and to enhance the effectiveness of the Group's OH&S processes, continuous training is provided to both the Group's employees and its subcontractors. The training places particular emphasis on the consequences of non-compliance with Occupational Health & Safety requirements, the prevention of workplace accidents, and the importance of individual responsibility, engagement and compliance in maintaining a safe working environment.

In addition, the Group issues monthly and ad hoc Health & Safety Flash communications for its projects and facilities. Each communication addresses a different topic, reflecting emerging needs and priorities. In 2024, the Group's Occupational Health & Safety Division issued and communicated a total of 15 Health & Safety Flash communications, with the aim of educating, informing and raising awareness among all employees.

During 2024, the Group delivered 2,156 hours of Occupational Health & Safety training, with the participation of 582 employees.

During their inspections, Occupational Health & Safety Inspectors, in cooperation with the relevant line managers, identify Occupational Health & Safety training needs for employees across the Group's various operations. In addition, each business unit or project manager, in collaboration with the responsible Occupational Health & Safety Manager, assesses the training needs of employees and may submit recommendations for training to the Group's Occupational Health & Safety Division. Training needs are also identified during the regular meetings of the Occupational Health & Safety Managers responsible for the Group's projects and facilities.

Across all the Group's projects and operations, every newly recruited employee receives Occupational Health & Safety induction training, including training on the Group's 15 Inviolable H&S Rules. Employees are also informed about the Group's Occupational Health & Safety Policy, the Occupational Health & Safety Management System, the personnel responsible for health and safety (including the Safety Technician, Health & Safety Coordinator, and Occupational Physician), as well as the occupational hazards associated with the work they will perform. All employees working at the Group's headquarters have access, through the corporate portal, to the "Health & Safety Guide for Employees at the Group Headquarters". Employees working on projects also receive training on the "Health & Safety Guide for Employees at the Group's Projects and Facilities", as well as on Safe Work Instructions relevant to the activities they are required to perform.

These initiatives form part of the Group's broader strategy to foster a strong Occupational Health & Safety culture, with the ultimate objective of promoting a safe and healthy working environment for all employees.

A detailed breakdown of the Group's Occupational Health & Safety training hours by business segment is presented in the following chart.

Occupational Health & Safety Training Hours

Total
2,156 ώρες

- Environment **1,502** - 70%
- ELLAKTOR S.A. **400** - 18%
- Real Estate Development & Services **176** - 8%
- Concessions **78** - 4%

Finally, as part of the Group's efforts to further strengthen the systematic recording of training activities attended by subcontractors' employees, training certificates are issued upon successful completion of the respective Occupational Health & Safety training programmes. According to the available data, in 2024, the Group's subcontractors' employees completed a total of 29 hours of Occupational Health & Safety training.

Internal Audits

The central Occupational Health & Safety (OH&S) functions of the Group companies conduct internal OH&S audits across the Group's projects and operations, including subcontractors, in accordance with the annual audit programme. These audits are carried out by IRCA-certified internal auditors as part of the implementation of the Occupational Health & Safety Management Systems (OH&S Management Systems).

Through these audits:

- non-conformities with applicable legislation, the Occupational Health & Safety Management Systems, and internal procedures are identified, while the necessary corrective actions are planned and implemented to address them;
- it is verified that the Occupational Health & Safety Management Systems are operating effectively and that there are no occupational health and safety risks that have not been identified and/or adequately addressed.

In 2024, the Group carried out 22 internal Occupational Health & Safety audits across 21 projects. Across all Group companies, these audits covered the requirements of the Occupational Health & Safety Management Systems and 28% of the Group's active projects, reaffirming the Group's commitment to continuous internal assurance, regulatory compliance, and adherence to its internal Occupational Health & Safety procedures. During internal project audits, the Group's subcontractors are also sampled and assessed for compliance with Occupational Health & Safety requirements. The findings of both internal and external audits are evaluated during the annual Management Review of each project's Occupational Health & Safety Management System. In addition, during 2024, the Group's projects underwent 32 external Occupational Health & Safety audits conducted by the competent authorities and certification bodies.

Incident Management

In the event of a work-related accident involving a Group employee or an employee of a subcontractor or supplier within an area under the Group's responsibility, the Emergency Response Plan, established in accordance with the Occupational Health & Safety Management System, is activated. A series of actions is then undertaken to:

- provide immediate first aid;
- notify the competent authorities, where required;
- inform the project or operational management, the Human Resources Division, the Occupational Health & Safety Managers, the Occupational Health & Safety Division, and the Project Owner (Employer), as applicable; and
- investigate the root causes of the incident and implement the necessary corrective actions to prevent similar incidents from occurring in the future.

For every work-related accident, an analysis and classification is carried out based on the type of injury and the nature of the incident. This process is undertaken by the Occupational Health & Safety Manager in collaboration with the Occupational Physician responsible for the respective project or operation. All workplace accidents are reported through the online platform of the Ministry of Labour in accordance with applicable legal requirements.

Following notification to the competent authorities, every work-related accident is investigated by the project's or operation's incident investigation team, in accordance with the Group's internal procedures and the requirements of applicable legislation.

More specifically, following each work-related accident, the Group companies investigate the root causes through an incident investigation team comprising the Project Director, the Occupational Health & Safety Manager, the Safety Engineer, the injured employee, and any other persons involved in or relevant to the incident. The investigation team analyses the root causes and determines the appropriate preventive and corrective actions required to prevent similar incidents from recurring. Based on the findings of the investigation, and where considered necessary, a dedicated Health & Safety Flash communication is issued addressing the relevant topic. Where appropriate, the Written Occupational Risk Assessment (WORA) is also reviewed and updated.

In accordance with the requirements of the Group companies' Occupational Health & Safety Management Systems, not only work-related accidents but also near misses are recorded. A near miss is defined as an unplanned workplace event that does not result in injury, ill health or damage. The recording, reporting and analysis of such events are essential for the continual improvement of the Occupational Health & Safety Management Systems and the effectiveness of the Group's preventive measures. In 2024, two unsafe acts requiring immediate corrective action and three near misses were recorded, resulting in a Near Miss Frequency Rate (NMFR) of 0.19.

All work-related accidents involving the Group's employees and subcontractors are managed in accordance with the same procedures and methodology established under the Occupational Health & Safety Management System. Depending on their severity and potential impact, all accidents are managed through a structured incident response and investigation process, with actions proportionate to their level of severity.

Occupational Health & Safety Performance Evaluation

The Group monitors and tracks a range of Occupational Health & Safety (OH&S) performance indicators, presented below, and establishes targets to drive their continual improvement. A structured process is in place for the collection, processing and verification of the relevant data, which are compiled at project level by the responsible Occupational Health & Safety Manager.

Each project also maintains a Monthly Occupational Health & Safety Report, which is used to monitor compliance with the Group's key Occupational Health & Safety performance requirements across its projects and facilities.

In addition, during internal project audits, the Group's subcontractors are also subject to sample-based Occupational Health & Safety assessments. More specifically, subcontractors' work-related accidents are recorded and investigated in cooperation with their Safety Technician assigned to the project. Furthermore, subcontractors' employees are required to comply with the Group's internal procedures, apply the 15 Inviolable H&S Rules, follow the Occupational Health & Safety instructions issued for each project or facility, and work in accordance with the project's Written Occupational Risk Assessment (WORA).

Occupational Health & Safety Initiatives

In addition to the systematic Occupational Health & Safety activities implemented annually by the Group's Occupational Health & Safety Division, in collaboration with the Health & Safety Managers of each subsidiary, the Occupational Health & Safety Managers of the Group's projects, and the Medical Unit at the Group's headquarters, the following initiatives were carried out during 2024 to further strengthen and continuously improve the Group's Occupational Health & Safety performance.

Building a Preventive Health Culture

The Group's Medical Unit also plays a key role in fostering a strong Occupational Health & Safety culture. Throughout 2024, it implemented a range of awareness initiatives to mark international health awareness days, including World No Tobacco Day and World Blood Donor Day. These initiatives included employee awareness campaigns, educational materials, Health & Safety Flash communications, direct engagement with employees, and practical emergency response exercises designed to strengthen employees' awareness and preparedness in relation to occupational health and safety.

- **Breast Cancer Awareness Seminar**
  An awareness seminar was held at the Group's headquarters in collaboration with the Hellenic Association of Women with Breast Cancer "Alma Zois". A total of 69 employees participated, both in person and online.
- **Preventive Cardiac Screening**
  Employees of ELLAKTOR Group were offered preventive cardiac screening, including echocardiography, conducted by a cardiologist, with 149 employees participating. The initiative was also repeated by the Attikes Diadromes Medical Unit, with the participation of 310 employees.
- **First Aid Training and Distribution of First Aid Kits**
  First aid training sessions were delivered to employees, accompanied by the distribution of first aid kits.
- **Blood Pressure Screening (World Hypertension Day)**
  A total of 49 employees at the Group's headquarters participated in a blood pressure screening initiative. The programme also included awareness sessions highlighting the importance of prevention and effective blood pressure management.
- **Automated External Defibrillator (AED) and Cardiopulmonary Resuscitation (CPR)**
  An Automated External Defibrillator (AED) was installed at Alimos Marina to provide first aid support to employees and visitors. In addition, the emergency response team received refresher training on the use of the AED, together with hands-on Cardiopulmonary Resuscitation (CPR) training.
- **Blood Donation Drives**
  The Group's Medical Unit, in collaboration with the Blood Donation Centre of Elpis General Hospital, organised its 5th and 6th voluntary blood donation drives. Employees responded positively, and both initiatives were considered successful.

Emergency Preparedness

- **Fire Safety and Fire Protection Trainingς**

  Recognising the importance of preparedness for emergency situations, the Group delivered Fire Safety and Fire Protection training to strengthen employees' emergency response capabilities. At the Group's headquarters, 25 employees and two external contractors participated in the training programme, which included both theoretical instruction and practical exercises involving the use of fire hoses and a live fire simulator.

- **Emergency Response Drill: "Man Overboard"**

  At Alimos Marina, an Emergency Response Drill was conducted based on a scenario involving a fire on board a vessel and the rescue of a crew member who had fallen into the sea. The drill, which formed part of the annual Occupational Health & Safety (OH&S) training programme, involved the participation of all relevant marina departments, together with the Emergency Response Team, to enhance preparedness and coordination in responding to emergency situations.

- **Building Evacuation Drill**

  A building evacuation drill was conducted at the Traffic Management Centre (TMC) building, with the participation of 103 employees from Attikes Diadromes and Attiki Odos.

- **Headquarters Building Evacuation Drill**

  A building evacuation drill was conducted at the Group's headquarters, involving 103 employees and occupants from the companies located within the headquarters complex.

€1,376,421

Total investment in initiatives aimed at safeguarding Occupational Health & Safety in 2024, including, among others, Occupational Health & Safety equipment, personal protective equipment (PPE), workplace measurements and inspections, and the implementation of Occupational Health & Safety initiatives and preventive measures.

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Occupational Health & Safety Performance Indicators

The Group records and monitors performance indicators and sets Occupational Health & Safety targets to support the continual improvement of its Occupational Health & Safety Management System.

In 2024, 16 employee accidents were recorded across ELLAKTOR Group companies, excluding pathological incidents, fatalities, commuting accidents, and accidents resulting in zero days of absence from work. Of these, 11 were minor accidents. The total number of lost days resulting from the 16 accidents was 600*. Of the 16 accidents, one was a road traffic accident that occurred during working hours. In addition to the 16 accidents, four accidents resulting in zero days of absence from work and six commuting accidents were also recorded.

The total number of lost days includes days of absence resulting from work-related accidents that occurred in 2024 and extended into 2025.

Work-Related Injuries – Group Employees

Note: Excluding fatalities, illness-related incidents, accidents resulting in zero days of absence from work, and commuting accidents (i.e. accidents occurring while travelling to or from work).

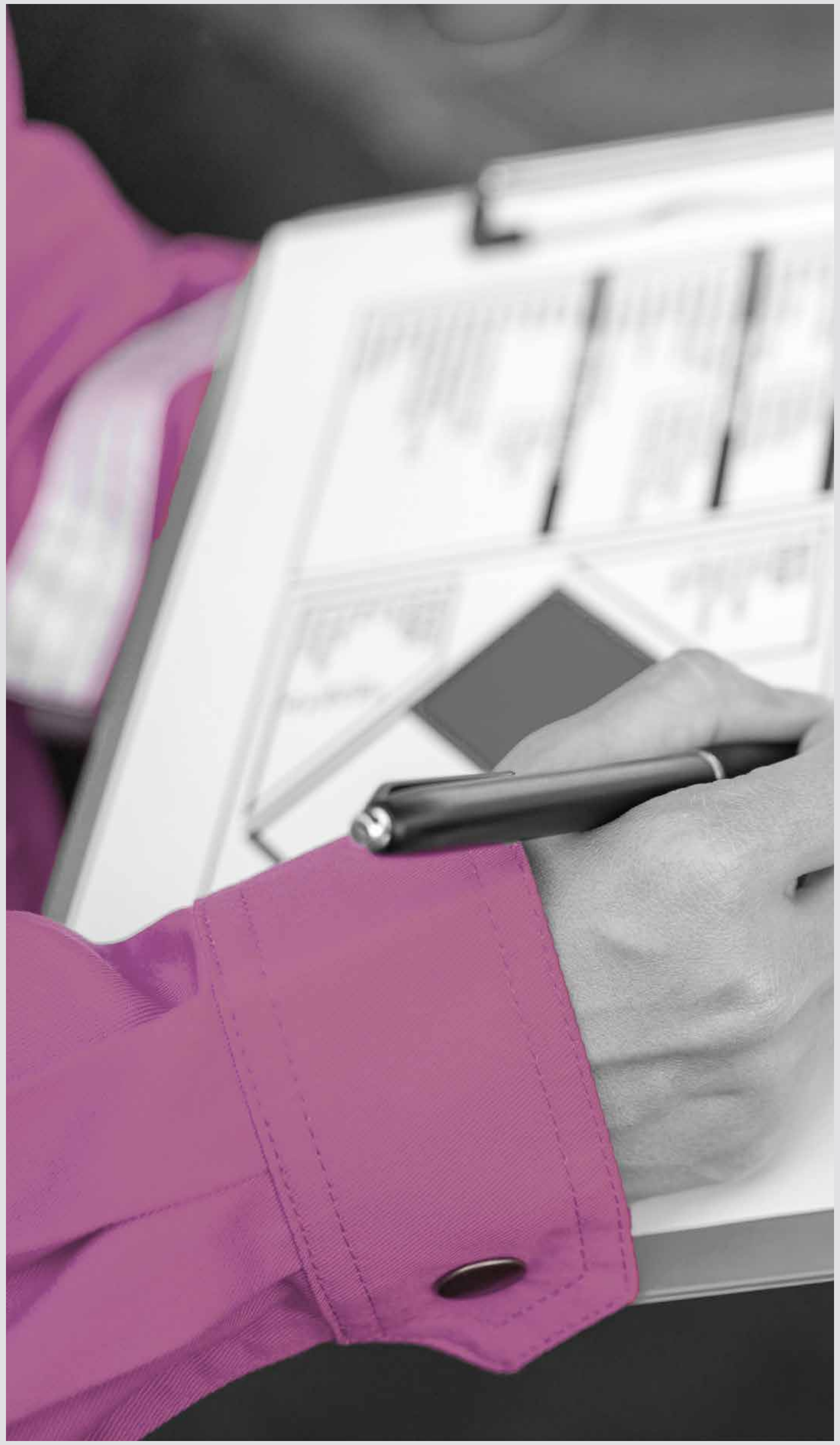
Of the occupational health and safety hazards identified through the Group's risk assessment process, the table below presents those that resulted in work-related accidents during 2024.

Causes / Nature of Work-Related Accidents – Group Employees

- Slips, Trips and Falls **6** - 37%
- Falling Objects **3** - 19%
- Falls from Height **3** - 19%
- Other Causes (Equipment) **3** - 19%
- Tool Handling **1** - 6%

No work-related injuries involving subcontractors' employees were recorded in 2024.

In 2024, the Group recorded no work-related fatalities, no cases of occupational disease, and no deaths resulting from occupational diseases.



Health and Safety Performance Indicators for Group Employees

Accident–Incident Frequency Rate

Year	Men	Women	Total
2022	3.34	2.51	3.01
2023	6.16	2.55	4.90
2024	3,37	10.26	5.08

Accident–Incident Frequency Rate (AIFR) = (Total number of accidents / Total hours worked) × 1,000,000. The indicator represents the number of work-related accidents per one million hours worked.

Accident–Incident Frequency Rate (AIFR)

Year	Men	Women	Total
2022	0.07	0.03	0.05
2023	0.12	0.01	0.08
2024	0.06	0.44	0.15

Accident–Incident Severity Rate (AISR) = (Total hours lost / Total hours worked) × 100. The indicator represents the number of working hours lost due to work-related accidents per 100 hours worked.

Accident–Incident Rate

Year	Men	Women	Total
2022	766	500	650
2023	1,214	515	973
2024	670	2,046	1,009

Accident–Incident Rate (AIR) = (Total number of accidents / Total number of employees) × 100,000. The indicator represents the number of work-related accidents per 100,000 employees.

Note: *These indicators exclude work-related fatalities, incidents resulting from illness-related causes, minor injuries requiring first aid only, accidents resulting in zero lost workdays, and commuting accidents (i.e. accidents occurring while travelling to or from work).*

Social Responsibility

A key objective and strategic priority of ELLAKTOR Group is to operate responsibly in the communities in which it operates. The Group contributes to social well-being through its business activities and social initiatives, while consistently responding, with responsibility and transparency, to the needs and expectations of local communities and society at large. At the same time, it operates with environmental responsibility, delivering high-quality infrastructure, energy and environmental projects, with the aim of improving people's quality of life and promoting sustainability.

Action Plan

To achieve its strategic objectives, the Group has developed the following action plan:

- Annual Donations and Sponsorship Plan (Completed)
- Increase employee volunteering activities compared with 2020 (Completed)
- Establish long-term partnerships with organisations and foundations (Completed)
- Conduct a stakeholder opinion survey every two years (Completed)
- Develop new channels for direct communication with stakeholders (Completed)
- Conduct quality inspections across 100% of projects (In progress)
- Increase training for quality engineers (In progress)

In progress
Completed

Contributing to Sustainable Cities and Communities

ELLAKTOR Group develops, implements and operates projects and infrastructure that contribute to enhancing the well-being of urban communities and creating a more inclusive, people-friendly and sustainable urban environment. The Group analyses and assesses the risks associated with the operation of its projects and implements measures to mitigate those risks, respond effectively to emergency situations, and ensure the uninterrupted operation of the areas in which it operates.

Infrastructure Safety and User Experience

ELLAKTOR Group is committed to providing high-quality products and services that comply with applicable requirements and meet the needs and expectations of its customers, while pursuing continuous improvement and adapting to the evolving needs of the market. The safety of the Group's operations is ensured through systematic compliance with requirements established by contractual obligations and national and international inspection standards.

To fulfil this commitment in the Group's projects where customers and end users have been identified, ELLAKTOR Group implements a certified Quality Management System, in accordance with the requirements of the ISO 9001:2015 international standard.

These practices ensure the effectiveness and reliability of the Group's processes and inspection results. Inspection procedures are reviewed periodically by Quality Engineers and the Central Quality Management Department to verify compliance with the applicable requirements.

Further information on the Quality Management System, the relevant policies and procedures, and the methods of communication and consultation with end users is available in Section B.4.3.2 "Consumers and End Users [S4]" of the 2024 Annual Financial Report.

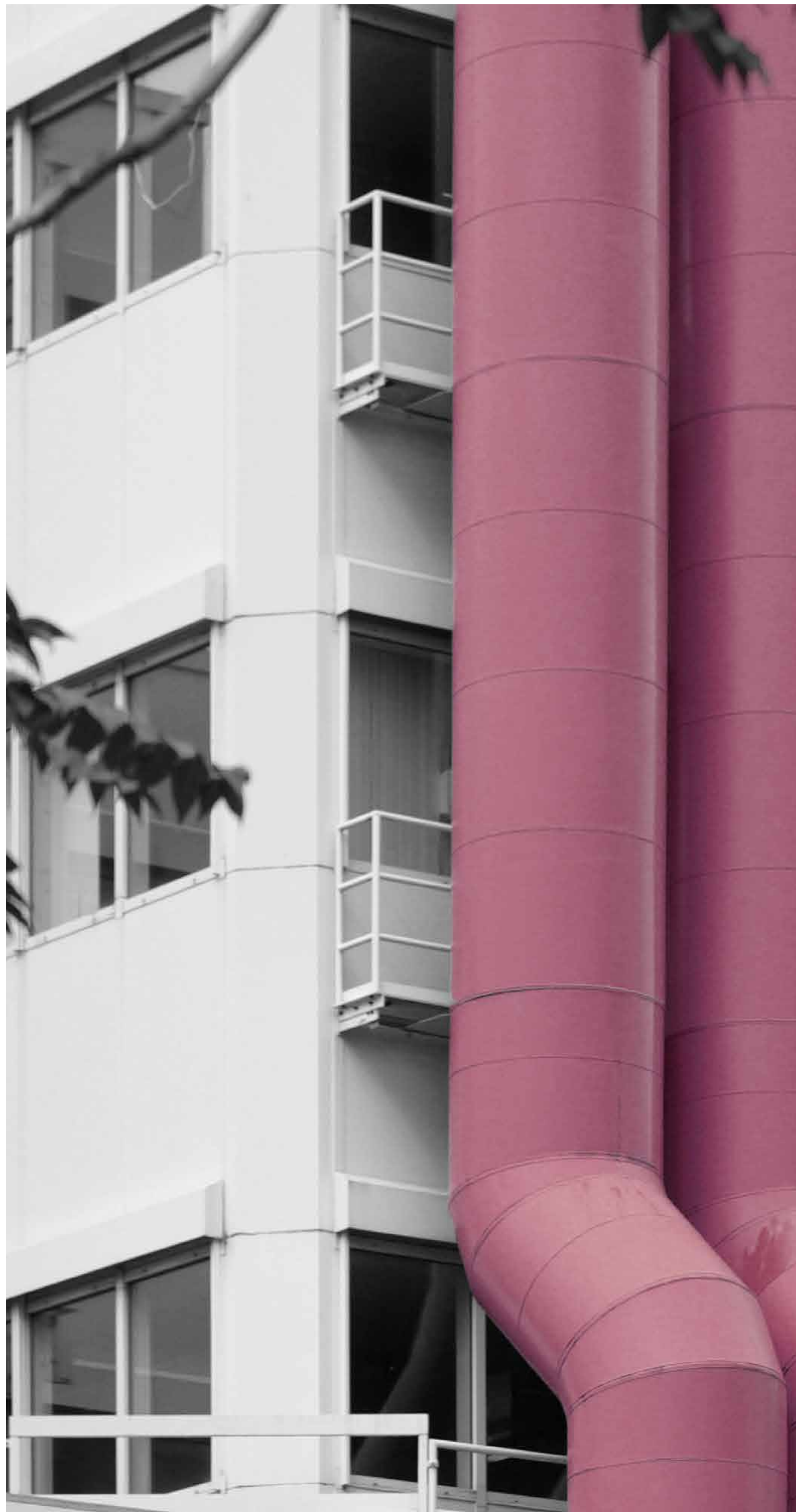
CONCESSIONS SEGMENT

The safety and service provided to motorway users are ongoing priorities for the Group companies responsible for the operation and maintenance of these motorways. The companies ensure that users benefit from properly maintained and safe road infrastructure, as well as the smooth operation of the motorways, enabling safer and more sustainable travel. On Attiki Odos, the average incident response time is 6.2 minutes.

Attikes Diadromes S.A. implements a Road Traffic Safety Management System in accordance with the requirements of ISO 39001:2012, having received numerous awards and recognitions in this field from the European Commission, the International Road Federation (IRF) and the International Bridge, Tunnel and Turnpike Association (IBTTA). In addition, Attikes Diadromes S.A. carries out regular inspections and assessments of the technical assets of Attiki Odos in accordance with the Inspection and Maintenance Manual approved by the Hellenic Republic. It also submits proposals to Attiki Odos S.A. regarding major maintenance works and/or infrastructure improvements, while Attiki Odos S.A. prepares the corresponding implementation programme.

ENVIRONMENT SEGMENT

The Group companies operating in the Environment Segment, through the practices they implement in mixed waste management projects, contribute to achieving high rates of reuse and recycling, preserving the value of natural resources, raw materials and products, and strengthening their contribution to the circular economy. At the same time, through the projects they manage, they play a leading role in the green transition towards a sustainable future by safeguarding ecosystems and biodiversity and improving public health and quality of life. Furthermore, in 2023, the companies of the Environment Segment implemented initiatives and programmes focused on strengthening infrastructure in the areas where they operate, as well as on educating and raising public awareness of environmental protection, with particular emphasis on recycling and reuse. The Mavrorachi Landfill Gas-to-Energy Plant is a project of strategic importance for improving the energy and environmental performance of regional landfills. The Mavrorachi Plant, unique both in its technical design and operation, generates renewable electricity while simultaneously preventing greenhouse gas emissions. These features, together with the energy recovery of the landfill gas produced and the resulting improvement in air quality, played a decisive role in the recognition and award received by the facility.



Enhancing the Urban and Built Environment

ELLAKTOR Group contributes significantly to the development and upgrading of infrastructure at both national and local level through its Concessions Segment, while in its Real Estate Development & Services Segment it places particular emphasis on upgrading the urban fabric, protecting open spaces, and creating and redeveloping recreational areas.

Building on its long-standing track record, the Group has delivered landmark, high-quality projects and continues to invest in new developments, such as the development, operation and commercial exploitation of Alimos Marina.

All projects are constructed in accordance with the latest technical specifications, applicable environmental legislation, and the approved environmental terms and conditions.

Within the Concessions Segment, and specifically in relation to the Attiki Odos project, covered sections of the motorway were developed during the construction phase, where feasible (e.g. in Vrilissia and along the Western Ymittos Ring Road), with the aim of better integrating the project into the surrounding environment and urban landscape. In addition, extensive flood protection works were implemented to reduce adverse impacts arising from extreme weather events, while continuous tree planting is carried out along the motorway embankments.

The activities of the Environment Segment deliver multiple benefits for ecosystems and the economy, enhancing people's quality of life and contributing to addressing the shortage of green spaces by reducing the need for landfill sites.

Management of Nuisances

The impacts of the Group's projects on local communities may include noise, vibrations, airborne particulate matter, visual disturbance, and traffic congestion.

CONCESSIONS SEGMENT

The companies operating in the Concessions Segment monitor noise levels along the entire length of the motorways they manage through permanent and mobile noise monitoring stations, in accordance with applicable legislation and their contractual obligations. Employees of the companies in the Concessions Segment operate company vehicles and construction machinery on the motorways under their responsibility in accordance with the Operation and Maintenance Manuals, while applying the principles of eco-driving to reduce air emissions and noise.

Attikes Diadromes S.A. monitors noise levels through dedicated monitoring devices installed at eight locations along the Attiki Odos motorway. Where noise limits are exceeded, Attiki Odos S.A., subject to the approval of the Hellenic Republic, proceeds with the installation of additional noise barriers. Furthermore, as in previous years, Attiki Odos S.A. continued in 2024 to carry out 24-hour noise monitoring using mobile noise monitoring units. Overall, during the 24 years of operation of the motorway, 21 km of noise barriers have been installed, together with acoustic buffer zones comprising landscaped berms and specially designed vegetation.

Similarly, Moreas S.A. monitors road traffic noise indicators on an annual basis. Any requests submitted by owners of properties located near the motorway are reviewed and assessed by the competent public authorities. Moreas S.A. updates its monitoring programme in accordance with the recommendations and instructions issued by the competent public authorities. In 2024, 19 measurements of road traffic noise indicators were carried out at 19 approved monitoring locations along the motorway. From the commencement of operation of the concession project in 2008 through to 2024, no exceedances of the statutory noise limits have been recorded.

ΚΛΑΔΟΣ ΠΕΡΙΒΑΛΛΟΝΤΟΣ

HELECTOR S.A. aims to reduce environmental noise levels and ensure compliance with the applicable Environmental Terms Approval Decisions during its waste collection and transportation activities. To achieve these objectives, the company implements a range of practices, including:

- Monitoring noise levels on a regular basis by carrying out measurements at multiple locations around the perimeter of its facilities.
- Ensuring the regular maintenance of vehicles and their inspection through the Roadworthiness Testing Centres (KTEO).
- Isolating noisy equipment within separate structures or units, either during the design of new facilities or whenever noise levels exceeding the statutory limits are identified at the perimeter of the facilities.

Engagement with Local Communities

ELLAKTOR Group places particular emphasis on building relationships of trust and mutual respect with the local communities in which it operates.

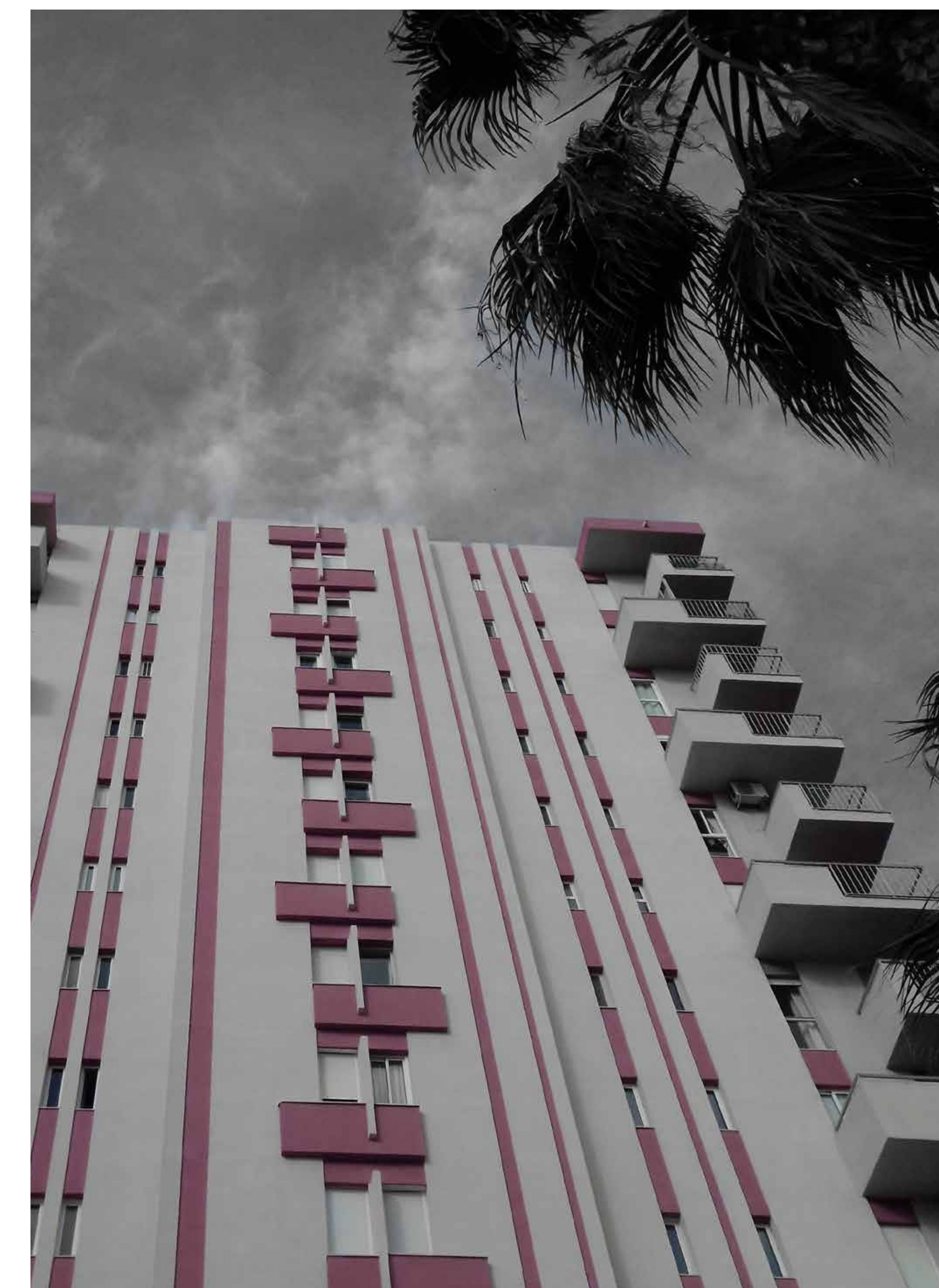
The Group fosters engagement with local communities through continuous dialogue and collaboration, responding to their needs. Within the Real Estate Development & Services Segment, projects are planned and implemented based on the expectations of local communities, following stakeholder consultation.

The Group also aims to strengthen communication with its stakeholders by developing new communication channels through its website.

It is worth noting that, in the context of the Gournes, Heraklion, Crete project, a qualitative and quantitative public opinion survey was conducted to explore and capture the views of local residents, local institutional stakeholders and other interested parties regarding REDS' investment plan for the area.

The survey aimed to assess the level of awareness of the project, including an analysis and evaluation of the sources through which participants had been informed, as well as their preferences regarding future communication. In addition, it captured participants' perceptions and views of the project. Particular emphasis was placed on identifying the perceived positive and negative aspects of the project, the changes it is expected to bring to the wider area, the local community and local residents, as well as on identifying the groups expected to benefit from, or be adversely affected by, the investment. Finally, the survey recorded participants' feelings and expectations regarding the investment plan.

This comprehensive survey contributed to a better understanding of the trends, perceptions and needs of the local community, providing valuable insights to support the future management and communication of the project.



Social Responsibility Initiatives

In response to the needs of society, ELLAKTOR Group undertakes initiatives to support society and vulnerable social groups.

Group Donations and Sponsorship Policy

Since 2022, the Group has implemented a Donations and Sponsorship Policy, the purpose of which is to define the fundamental principles governing the Group's donations and sponsorships, the key characteristics of the initiatives and organisations eligible for support, and the procedures to be followed in the evaluation and implementation of donations and sponsorships. In accordance with the Group's Policy, monetary or in-kind donations to political parties, coalitions of political parties, or politicians are prohibited.

The Group Donations and Sponsorship Committee was established to ensure the Group's commitment to always stand alongside society, listen to its needs and expectations, and respond to them with sensitivity, professionalism, integrity and respect, while building relationships of trust and supporting the local communities in which it operates. Among its responsibilities, the Committee is responsible for the approval, monitoring and implementation of the Group's Donations and Sponsorship Strategy and the Annual Donations and Sponsorship Plan. In 2024, the Donations and Sponsorship Committee held 12 meetings.

€1,324,144

ELLAKTOR Group's contribution to society through donations and sponsorships in 2024.

ELLAKTOR Group recognises the importance of Corporate Social Responsibility as a means of providing meaningful support to society and the environment. Its initiatives aim to improve everyday life, support social and environmental initiatives, and contribute to ensuring a sustainable future.

These initiatives are not merely isolated actions, but form part of a systematic and collective effort that demonstrates the power of collaboration in creating a better quality of life. The Group's social responsibility extends beyond individual initiatives, promoting a culture of volunteering, health, harmonious coexistence and innovation.

With a focus on environmental stewardship and personal and professional development, the Group seeks to contribute to the creation of a modern and sustainable world for future generations. Within this framework, ELLAKTOR launched the new identity of its Corporate Social Responsibility programme, "Whole Living", in September 2023.

Whole Living

The "Whole Living" identity embodies all of the above values through four key pillars, which are presented below.

Living Green

We aim to protect our planet and address the climate crisis in order to ensure sustainability for future generations through the implementation of **"Living Green"** initiatives.

Living Smart

We promote a modern way of living through innovation and technology, through our **"Living Smart"** initiatives.

Living Well

We encourage good physical and mental health, with the aim of improving well-being through our **"Living Well"** initiatives.

Living Together

We promote a life free from discrimination by fostering equal opportunities, accessibility, inclusion and acceptance, personal and professional development, and collective initiatives in support of vulnerable groups through our **"Living Together"** initiatives.

Although this strategy serves as the primary framework guiding the Group's social support initiatives, ELLAKTOR Group also responds promptly to emergency situations and natural disasters, above and beyond its established strategy.

ELLAKTOR Group Social Contribution Initiatives

The Group companies design their social contribution initiatives based on:

- **Their business sector.**
- **The needs of the local communities and society at large.**

The main initiatives include:

- **Financial support for:**
  - Non-profit organisations.
  - Social welfare organisations and institutions.
  - Local associations (sports clubs, choirs and cultural centres).
- **Support for educational events:**
  - Emphasis on knowledge transfer.

Partnerships with Recognised Organisations:

- Association of Children with Special Needs "ELPIDA".
- Make-A-Wish Greece, a non-governmental organisation (supported by the Group since 2016).
- DIAZOMA, a non-profit association.
- SOS Children's Villages Greece.

Indicative Programmes and Initiatives Implemented in 2024:

- Social contribution initiatives addressing the needs of local communities.
- Initiatives promoting the values of sport.
- Initiatives contributing to the achievement of the United Nations Sustainable Development Goals (SDGs).
- Initiatives promoting culture.
- Initiatives supporting innovation and the next generation.

Gold Sponsor of the Hellenic Swimming Federation

Sponsorship Period: 2022-2024

Objectives of the Sponsorship:

- To create better conditions for athletes and sports clubs throughout Greece.
- To promote the value of sport among the younger generation.
- To support professionals involved in aquatic sports.
- To strengthen the national teams in preparation for the 2024 Olympic Games.

Values Promoted:

- Commitment
- Integrity
- Development
- Excellence

Through this sponsorship, ELLAKTOR Group demonstrates its commitment to supporting young people and promoting the values of sport, reinforcing the role of sport as a driver of development and progress.

Supporting a Student from the Island of Fournoi

"ExcellenSeas" Programme:

- **Programme Objective:** To provide financial support and mentoring to high-achieving students from Greece's remote border islands.
- **Duration of Support:** 4 years

Programme Focus:

- Academic mentoring.
- Professional development.

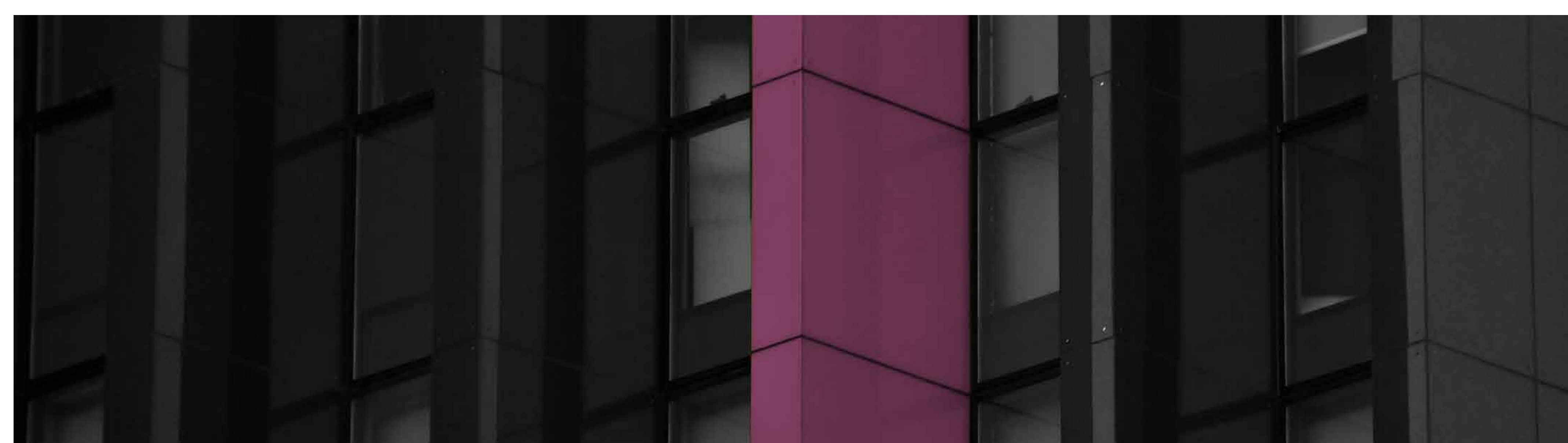
Student Support:

- Example: Support for a student from the island of Fournoi.

Values Promoted:

- Strengthening local communities.
- Supporting the younger generation.
- Recognising and rewarding excellence.

Through the "ExcellenSeas" programme, ELLAKTOR Group demonstrates its commitment to these values by contributing to the development and success of talented young people from Greece's remote border islands.



Sponsorship of the Educational Field Study of the National Technical University of Athens School of Civil Engineering

- **Purpose:** To enhance the educational experience of Civil Engineering students.
- **Organised by:** The School of Civil Engineering of the National Technical University of Athens (NTUA) as part of an educational field study in Europe.

Educational Benefits for Students:

- Observation of the geotechnical development of major engineering projects.
- Study of projects such as:
- Roads
- Tunnels
- Dams
- Railway infrastructure
- Special foundations
- Bridges
- Examination of major engineering failures resulting from geological and geotechnical causes.
- Use of internationally recognised case studies in Civil Engineering education.

Through this sponsorship, ELLAKTOR Group supports the education and development of the next generation of engineers by providing valuable opportunities for practical learning and a deeper understanding of engineering challenges.

Supporting the Hope Boxes Initiative for Vulnerable Social Groups in Collaboration with Wise Greece

Collaboration with Wise Greece:

- Third consecutive year of collaboration.
- **Objective:** To provide food assistance to people in need.

About Wise Greece:

- An award-winning non-profit initiative.
- Promotes the benefits of the Greek diet and products from small Greek producers.
- Proceeds from product sales are used to purchase and distribute food free of charge to vulnerable social groups.

ELLAKTOR Group's contribution through its companies:

- **Donation:** 1,200 Hope Boxes.
- **Equivalent:** 36 tonnes of essential food supplies.

Contents of each Hope Box:

- 5 kg of essential food supplies.
- **High nutritional value products:** honey, olive oil, pulses, and other food items.

Distribution of the Hope Boxes:

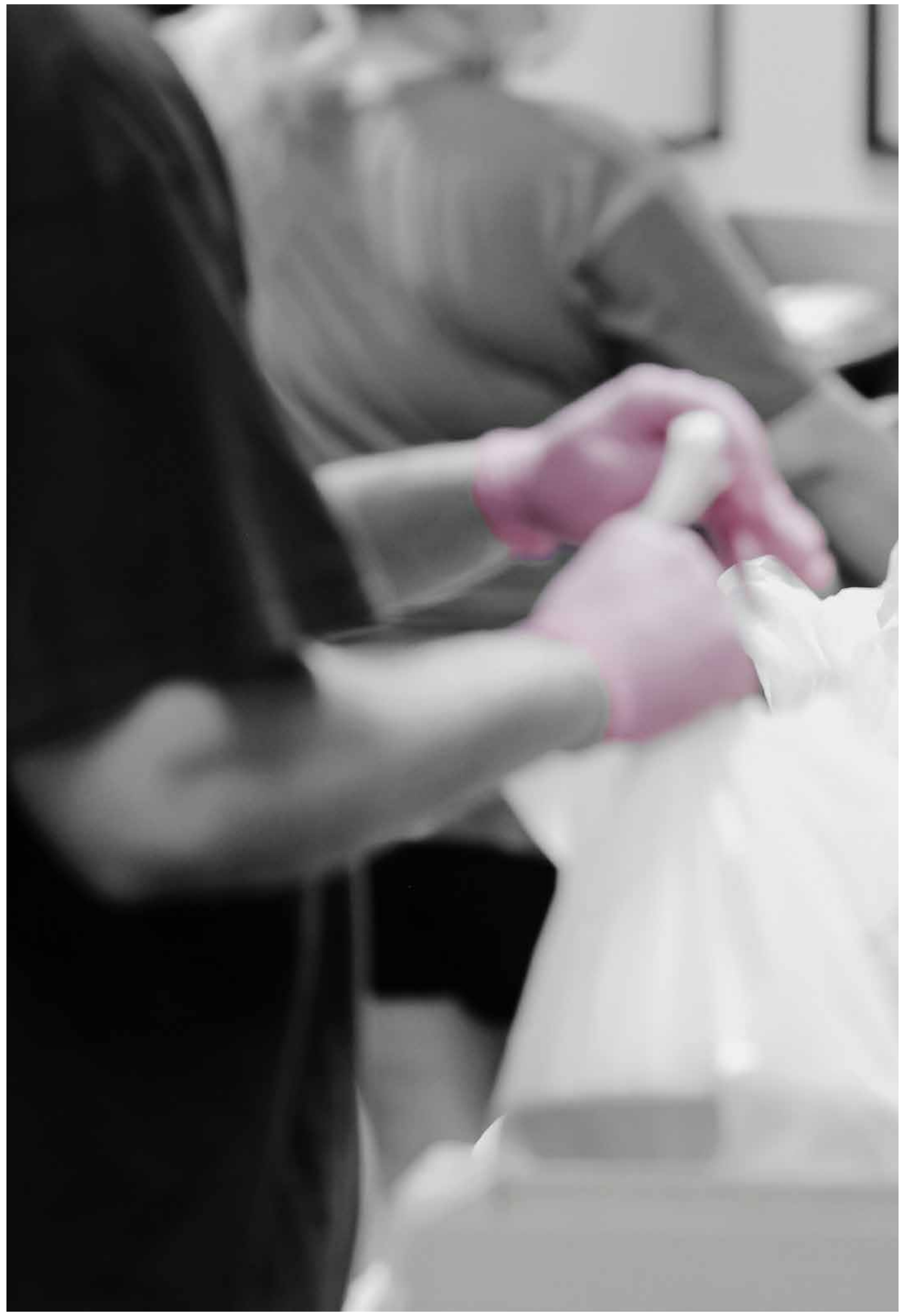
- Rehabilitation and Recovery Centre for Children with Disabilities (formerly PIKPA)
- "Filiki Folia" Centre of Love
- Hatzikyriakio Child Care Institution
- "The Children's Home" Foundation

Beneficiaries:

- 655 children

Supporting High-Quality Public Healthcare Services

At the beginning of 2024, ELLAKTOR Group donated a state-of-the-art digital colour ultrasound system to support the educational, research and operational needs of the Third Department of Paediatrics of the National and Kapodistrian University of Athens.



Participation in the We4All Environmental Alliance

Collaboration with We4All (2022–2024):

- Participation in the We4All Environmental Alliance.
- Awarded Guardian status in recognition of the donation of 1,000 tree saplings.
- Upgraded to EARTH PROTECTOR, with a commitment to plant up to 5,000 trees.
- Donation of 500 fruit-bearing tree saplings to fire-affected areas:
  - 80 in Limni, Northern Evia
  - 260 olive trees in Skepasti, Northern Evia
  - 100 olive trees in Gytheio, Eastern Mani
  - 0 in Kalyvia, Attica

"GREEN FUTURE" Educational Programme:

- Delivery of 45 interactive environmental education sessions (2023–2024) in schools located in areas where the Group operates.
- Focus on environmental issues, good practices and volunteering.
- Participation of more than 1,700 students.

"GREEN HOPE" Programme:

- Promoting the inclusion of vulnerable social groups through educational initiatives.
- Delivery of educational activities in Special Education Schools.

Employee Training:

- 2 hybrid seminars attended by more than 300 employees.
- **Topics:** Climate change, fast fashion and food waste.
- **Objective:** To enhance understanding of sustainability-related risks and promote sustainable practices.

Through these initiatives, ELLAKTOR Group promotes environmental awareness and actively contributes to addressing the impacts of climate change.

Wise House

ELLAKTOR Group supported the establishment of Wise House, a space dedicated to social contribution, culture and solidarity. Wise House is the new home of Wise Greece, where its diverse activities will be brought together. These include educational programmes for vulnerable groups, "Cooking for a Good Cause" initiatives, through which meals are prepared and distributed to homeless people, food tasting events and opportunities to meet small Greek producers, educational workshops on the United Nations Sustainable Development Goals (SDGs), and upcycling workshops.

The Group's sponsorship covered the construction of the kitchen and the provision of the necessary equipment to enable "Cooking for a Good Cause" to be carried out by Wise Greece volunteers, through which portions of cooked meals are provided to people in need.

1st International Meeting of the United Nations Academic Hubs

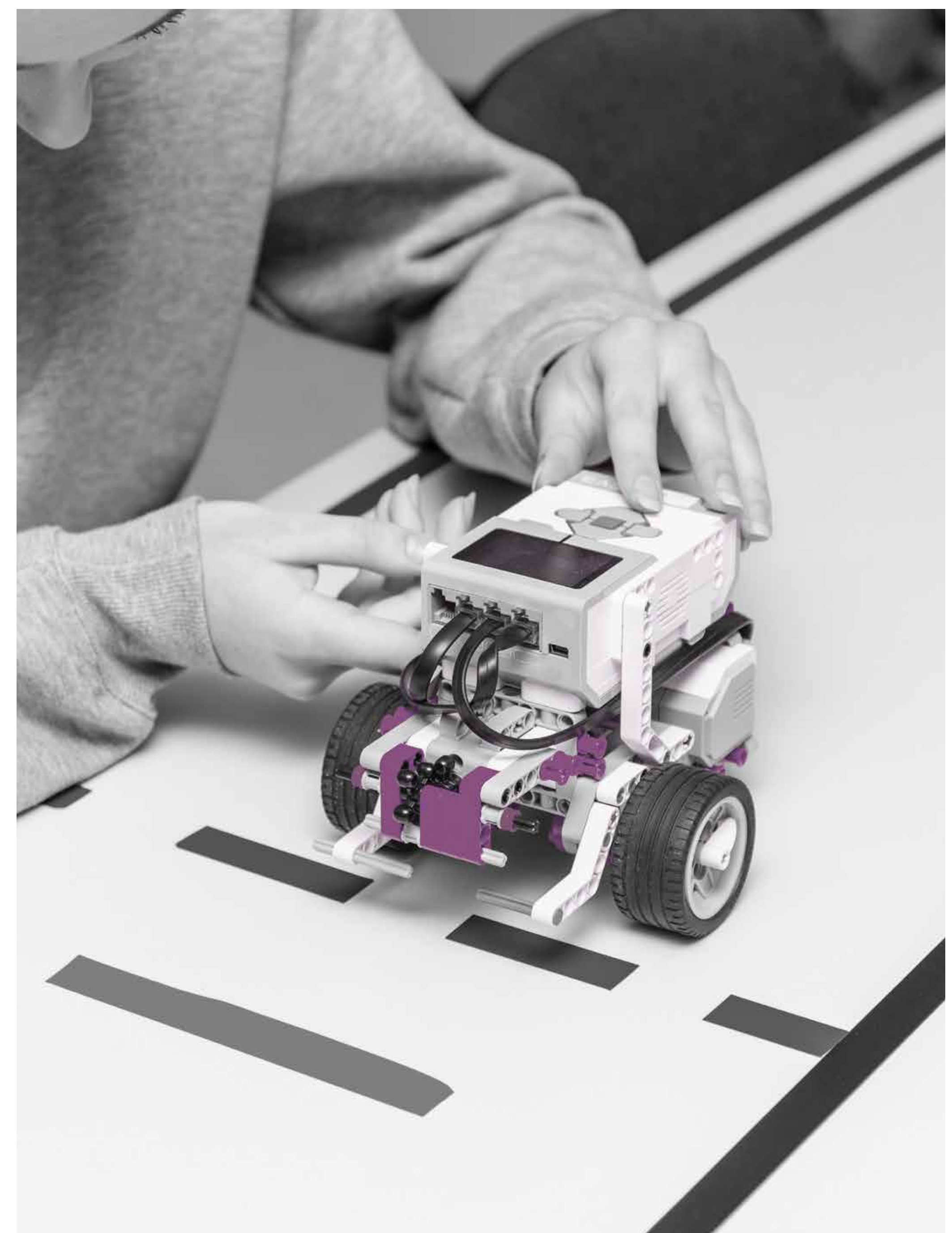
ELLAKTOR Group had the honour of sponsoring the 1st International Meeting of the 17 United Nations Academic Impact Hubs for the Sustainable Development Goals (UNAI Hubs for the SDGs), which was held with the participation of leading academic institutions from around the world.

The United Nations Academic Impact (UNAI), a network comprising more than 1,600 universities and research institutions worldwide, promotes the engagement of the academic community with the 2030 Agenda for Sustainable Development and the implementation of the 17 Sustainable Development Goals (SDGs).

ELLAKTOR Group's support for this initiative reflects its commitment to strengthening collaboration among businesses, the academic community and international institutions, with the aim of promoting sustainable progress and social cohesion.

Initiatives Promoting Culture

ELLAKTOR Group contributed to the efforts of the Capodistrias Museum in Corfu to operate as a centre of culture, research and learning for the benefit of society through its sponsorship. More specifically, this sponsorship funded the works required at the Capodistrias Research Centre of the Museum to create a modern venue that will host, among other activities, exhibitions and educational programmes.



In 2024, ELLAKTOR Group once again supported the events organised by the Florina Prespes Cultural Events Organisation, known as "Prespeia". This long-established cultural institution aims to promote Greek culture, the arts and the rich cultural heritage of the region.

Finally, the Group was a sponsor of the 13th International Summer Piano Academy and Festival "Anastasios Leimonis", which was held on the island of Poros.

ELLAKTOR Group Strengthens Social Cohesion Through Targeted Initiatives in 2024

In 2024, ELLAKTOR Group remained firmly committed to supporting society by implementing and strengthening a wide range of initiatives with a positive social impact, placing particular emphasis on supporting vulnerable groups and the younger generation.

For the eighth consecutive year, the Group supported the work of the NGO Make-A-Wish Greece, granting the wishes of five children with serious illnesses, offering them strength, joy and hope.

At the same time, the Group supported the RobotExperts team from Trikala by sponsoring its participation in the World Robotics Championship in Houston, thereby promoting innovation and empowering the younger generation.

In the same spirit, the Group sponsored the Prom Racing student team of the National Technical University of Athens (NTUA) for the construction of P24, the team's fourth electric and second autonomous formula-style racing car.

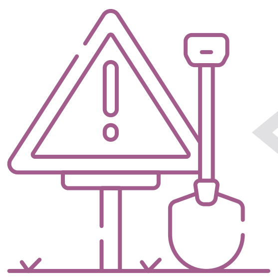
The Group also supported the "Solidarity Subscription" initiative of Shedia, contributing to the relief of people living in conditions of extreme poverty.

Finally, as part of the disposal of its fixed assets, the Group donated furniture to eight schools and one municipality, helping to address their immediate operational needs.

CONCESSIONS SEGMENT

Over the years, Attiki Odos S.A. and Attikes Diadromes S.A. have chosen to focus on the next generation of drivers and have succeeded in delivering the road safety message to more than 206,898 children and adolescents.

In 2024, with the support of the two companies, seven educational road safety and traffic education programmes continued to be implemented. These programmes have been designed with the assistance of specialised professionals.



"Eyes Open on the Road" Programme (e-Learning):

- **Objective:** To raise awareness among students in the second and third grades of lower secondary school and upper secondary school.
- **Approach:** Online learning environment.
- **Number of students:** 1,690 students from 15 schools.

"Digital Road Safety Activity Pack"

- **Objective:** An educational tool for primary school teachers.
- **Distribution:** 551 teachers from 486 schools.

Interactive Exhibition "Driving and Walking Safely":

- **Location:** Athens Conservatoire.
- **Target age group:** Children aged 3–12 years.
- **Visitors::** 3,023 children and 3,141 accompanying adults.

Experiential Performance "Attikoulis":

- **New production:** "Attikoulis in the Kingdom of Clumsiness".
- **Number of children:** 1,165 children and 430 adults, bringing the cumulative audience to 65,600.

"Holidays and Road Safety" Voluntary Initiative:

- **Συμμετοχή:** Children of employees of Attiki Odos S.A. and Attikes Diadromes S.A.
- **Εκθεσιακός Χώρος:** Hellenic Children's Museum.

"The Troubadours of the Asphalt" with Burger Project:

- **Objective:** To educate kindergarten and primary school children.
- **Number of children:** 3,040 children from 18 schools.

"Travel Safely" Programme:

- **Implemented in cooperation with:** Road Safety Institute (R.S.I.) "Panos Mylonas".
- **Participants:** 5,346 students and 562 teachers, bringing the cumulative number of participants to more than 92,000.

Through these initiatives, ELLAKTOR Group and ATTIKI ODOS S.A. make a meaningful contribution to the education and safety of the younger generation by promoting road safety awareness and responsible road user behaviour.

With regard to adult road safety education, the two companies once again supported the Emergency Medical Services (EKAB) rapid response motorcycle unit by covering the costs of their safe riding training through a specialised programme led by road safety expert Thanasis Chountras. Specifically, 26 rider-paramedics participated in a specialised programme comprising both theoretical and practical training.

In addition, the companies donated 6 tonnes of food to four charitable institutions in collaboration with the non-profit organisation Wise Greece. The beneficiary organisations were PIKPA Voula, the "Filiki Folia" Centre of Love in Elefsina, the Hatzikyriakio Child Care Institution in Piraeus, and the "Paidiki Stegi" Foundation.

Within the Environment pillar, with the support of Attiki Odos S.A., the reforestation of 50 hectares of forest that had been completely destroyed by wildfire in Penteli, Attica, in July 2022, was carried out. Specifically, 3,500 trees were planted in the Drafi area. The initiative was implemented in cooperation with the non-profit civil company "Alliance for Greece" and Maxima Insurance S.A., which has been appointed by the Ministry of Environment and Energy as the contractor responsible for the restoration of large forest areas in Penteli and Agios Stefanos, under the "Our Forest" programme.

It should also be noted that, among others, the companies supported the DIAZOMA Association, the Department of Engineering Geology of the National Technical University of Athens (NTUA), and the Association for the Protection and Development of Mount Hymettus (SPAY).

Initiative Category	Description of Initiative	Details
Financial Support for Culture	▸ Support for the DIAZOMA Association ▸ Sponsorship of the 30th Kalamata International Dance Festival ▸ Sponsorship of the 8th Revival of the Nemean Games	Provision of financial support for cultural initiatives
Promoting Innovation	▸ Sponsorship of the 3rd Robotics and Intelligent Systems Festival	Organised by the Municipality of Kalamata, with the objective of promoting innovation and digital transformation
Support for Sport	▸ Support for the Ancient Messene Open International Wheelchair Tennis Tournament ▸ Support for RUN GREECE Nafplio 2024	Support for sporting events
Engagement with Local Communities	▸ Donation for the purchase of equipment for the Corinth Forest Fire Protection Association ▸ Donation of pet food to the Tripoli Cultural and Animal Welfare Association for feeding stray animals ▸ Sponsorship of equipment for the Messinia 4x4 Disaster Response Team	Support for local initiatives and community actions.

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REAL ESTATE DEVELOPMENT & SERVICES SEGMENT

«R.E.D.S TROPHY 2024»

R.E.D.S., a subsidiary of ELLAKTOR Group, supported the "R.E.D.S TROPHY 2024" Interclub Sailing Regatta, organised by the Kalamaki Nautical Club. R.E.D.S. and the New Alimos Marina consistently support the events organised by the Kalamaki Nautical Club, which has demonstrated extensive expertise in organising major sporting events.

ENVIRONMENT SEGMENT

The initiatives and programmes implemented by the Group companies operating in the Environment Segment focus on supporting the communities in which they operate.

As part of its long-standing support for sport and local communities, HELECTOR was a sponsor of the Aligenis Milos Combined Events Meeting 2024, held on the island of Milos.

The event is one of Greece's leading international combinted events competitions and, this year, brought together world-class athletes from 13 countries, establishing Milos as a reference point in the international athletics community.

HELECTOR's support for this event forms part of its strategy to strengthen initiatives that promote participation, excellence and international outreach, while at the same time creating added value for local communities.

Employee Volunteering

As part of its social contribution programme and in conjunction with the Company's Volunteering Month, which has been established as an annual initiative since 2021, ELLAKTOR Group once again implemented initiatives in 2024 aimed at supporting people in need, as well as environmental initiatives intended to protect the environment and mitigate the impacts of climate change. In 2024, employees and their family members who participated in volunteer initiatives organised by the Group contributed a total of 1,096 volunteering hours.

Initiative Category	Description of Initiative	Details
Support for Vulnerable Groups	▸ Make-A-Wish Greece Walk for Wishes 2024 ▸ Support for the work of Fabric Republic through the collection of clothing and bedding ▸ Employee participation in Race for the Cure®	More than 40 employees participated in the annual Walk for Wishes 2024. Through their participation, they honoured the wish children who have overcome a serious illness, those who continue to fight, and the memory of those who illuminated our path. The Group's employees donated more than 760 kg of clothing to people in need, demonstrating their commitment both to supporting vulnerable groups and to protecting the environment through recycling practices For the second consecutive year, ELLAKTOR Group supported the work of the Hellenic Association of Women with Breast Cancer "Alma Zois" as a supporter of Greece Race for the Cure® 2024. Employees of ELLAKTOR Group, together with their families, participated in the 5 km race and the 2 km walk. They also took part in awareness-raising and prevention activities, demonstrating their social awareness and commitment to volunteering.
Events	▸ Christmas and Easter Bazaar	In cooperation with the other companies co-located at the Group's headquarters, ELLAKTOR Group hosted the Make-A-Wish Greece Easter and Christmas Bazaars, with the aim of raising funds to grant the wishes of the Organisation's children.
Environmental Initiatives	▸ Environmental protection and climate change mitigation	The Group's employees participated in the 1st voluntary beach clean-up

Voluntary Beach Clean-up Initiative

For ELLAKTOR Group, protecting the environment and properly informing local communities on environmental issues are a priority and a commitment. As part of the Group's "Whole Living" Corporate Social Responsibility programme, Nea Marina Alimou Development, a subsidiary of the Group, organised a clean-up of Bikini Beach in Alimos on Sunday, 10 March, with the participation of volunteers, employees and residents of the wider area.

The initiative, which was implemented in cooperation with the Municipality of Alimos and the non-profit organisation We4All, aimed to raise awareness and provide environmental education, particularly among the younger generation, about plastic pollution and the microplastics it leaves behind, which are considered an increasing threat to the health of people and the planet. With the support of the environmental organisation We4All, the participating volunteers were informed about the importance of preserving coastal and marine ecosystems, as well as how everyone can contribute towards this goal.

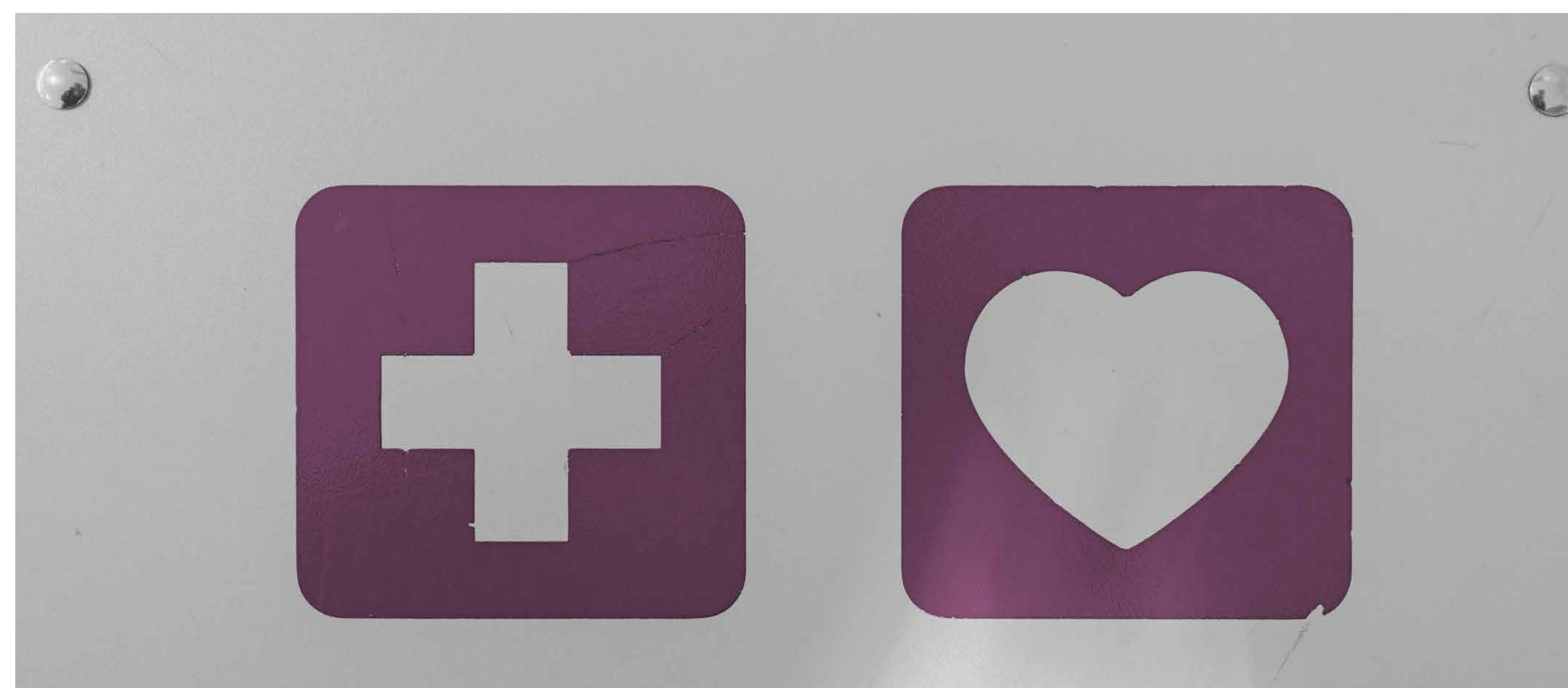
Children and adults alike, equipped with the necessary equipment and great enthusiasm, covered most of the beach, removing more than 2,500 litres of waste from the shoreline, including cigarette butts, microplastics and other litter, thereby demonstrating that through collective effort and the power of collaboration we can achieve a better and more sustainable future.

Voluntary Blood Donation

ELLAKTOR Group actively promotes voluntary blood donation among its employees through various initiatives. Attiki Odos S.A. and Attikes Diadromes S.A. have maintained a Blood Bank since 2004, providing employees and their family members with access to blood in cases of need, with consistently high participation each year. At HELECTOR, an employee blood donor association organises blood donation drives twice a year at the recycling plant, in cooperation with Evangelismos Hospital. In addition, the Group's Occupational Health Clinic, together with the Blood Donation Centre of ELPIS Hospital, organised two Blood Donation Days in 2024, with significant employee participation. These initiatives aim to maintain the Blood Bank in order to meet blood supply needs. The companies reward blood donors with one additional day of leave for each blood donation.

Group Companies' Blood Donation Data for 2024

280	9	422	175
Voluntary blood donors	Voluntary blood donation drives	Blood units collected	Blood units provided to employees



Governance

Alignment with the Sustainable Development Goals

8 DECENT WORK AND ECONOMIC GROWTH
11 SUSTAINABLE CITIES AND COMMUNITIES
16 PEACE, JUSTICE AND STRONG INSTITUTIONS
17 PARTNERSHIPS FOR THE GOALS

Alignment with the Principles of the United Nations Global Compact

ANTI-CORRUPTION

MAIN ACHIEVEMENTS

- Adoption of a new ESG-based business partner assessment platform
- Design and implementation of a risk-based compliance audit and internal inspection programme
- Update of the Anti-Corruption Policy
- 5 specialised Committees supporting the effective governance of the Group
- Maintenance of a certified Business Continuity Management System (BCMS) in accordance with the requirements of ISO 22301:2019

OUR PERFORMANCE

3
research projects

€619
thousand invested in digital transformation

96%
of the Group companies' procurement expenditure was sourced from local suppliers

0
confirmed incidents of corruption, bribery or conflicts of interest across ELLAKTOR Group

ELLAKTOR Group is committed to conducting its business in accordance with responsible and ethical practices, in full alignment with the values it has adopted.

To achieve its strategic objectives under the pillars of Integrity and Business Ethics and Innovation and Digital Transformation, the Group has developed a series of initiatives for the coming years, which are presented in detail in the respective sections of this chapter.

Action Plan

Action	Status
ESG assessment and scoring of critical business partners	In progress
Development of action plans to improve the ESG performance of critical business partners	In progress
Expansion of ESG assessment and scoring to business partners	Completed
Development of an e-learning course on anti-corruption, covering bribery-related topics, and training of employees with relevant access	Completed
Development and implementation of a Business Partner Due Diligence framework on Business Ethics and Integrity	Completed
Inclusion of an Integrity Clause in all contracts with business partners	Completed
Training of critical business partners on the Business Partner Code of Conduct	In progress
Integration of more stringent ESG criteria into the Group's risk register	Completed
Identification, management and development of mitigation action plans for identified risks	Completed
Certification and maintenance of ELLAKTOR S.A.'s Corporate Governance Management System in accordance with ISO/IEC 37000:2021	Completed
Deployment and implementation of Artificial Intelligence (AI)-enabled smart reporting and automation of routine and repetitive processes	In progress
Development of an e-learning course to enhance employees' core digital skills	In progress
Gradual migration of 70% of the Group's systems to cloud servers	Completed

In progress
Completed

Corporate Governance

The continuously evolving environment in which ELLAKTOR Group operates requires the adoption of an effective corporate governance framework that responds to current challenges and adapts to changing business, economic and social conditions, while recognising emerging risks and opportunities.

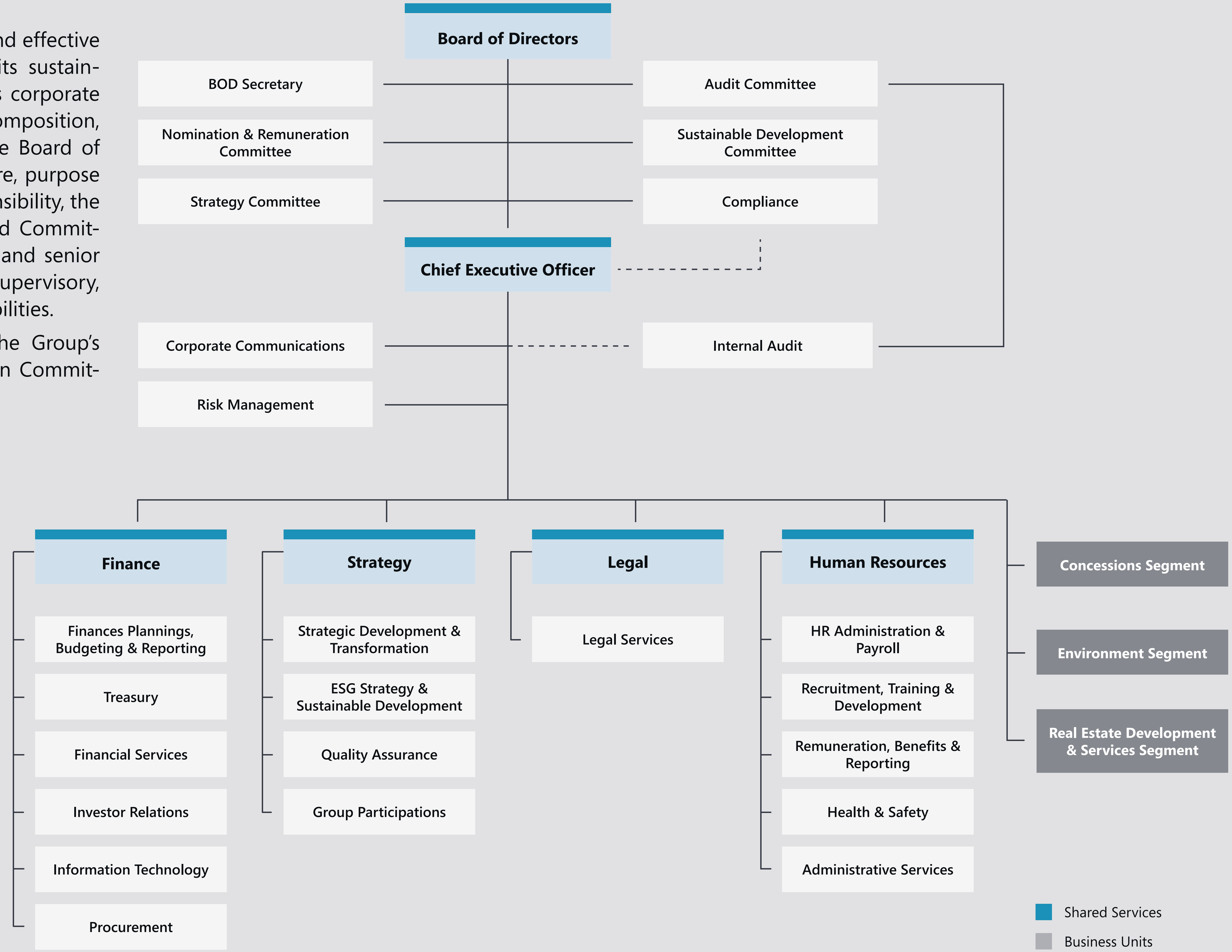
The Group's Management has established a robust and effective Corporate Governance System, enabling the implementation of its strategy in a manner that ensures both the efficient operation of the Group and the protection of shareholders' interests, while safeguarding the legitimate interests of all stakeholders. At the same time, the Group applies sound corporate governance practices to ensure its responsible organisation, operation, management and oversight.

ELLAKTOR Group has obtained ISO 37000:2021 certification for the Governance of Organizations, becoming one of the first companies in Greece to receive this certification. ISO 37000:2021 is the global benchmark for good governance, incorporating internationally recognised best practices.

Organisational Structure

ELLAKTOR Group operates under a modern and effective organisational model designed to support its sustainable and responsible development. It applies corporate governance practices relating to the size, composition, responsibilities and overall functioning of the Board of Directors and its Committees. Given the nature, purpose and complexity of the matters under its responsibility, the Company's Board of Directors has established Committees comprising designated Board members and senior executives to support Management through supervisory, approval, coordination and advisory responsibilities.

The organisational chart below illustrates the Group's principal organisational structure and its main Committees, as in effect on 31.12.2024.



Further information on the Group's governance structure is available on the Group's website.

Corporate Governance Code

ELLAKTOR applies the principles of corporate governance in accordance with the applicable legal and regulatory framework. These principles have been incorporated into the Hellenic Corporate Governance Code issued by the Hellenic Corporate Governance Council, with which ELLAKTOR complies. The Code, which is based on the Corporate Governance Principles of the Organisation for Economic Co-operation and Development (OECD), is available on the Company's website.

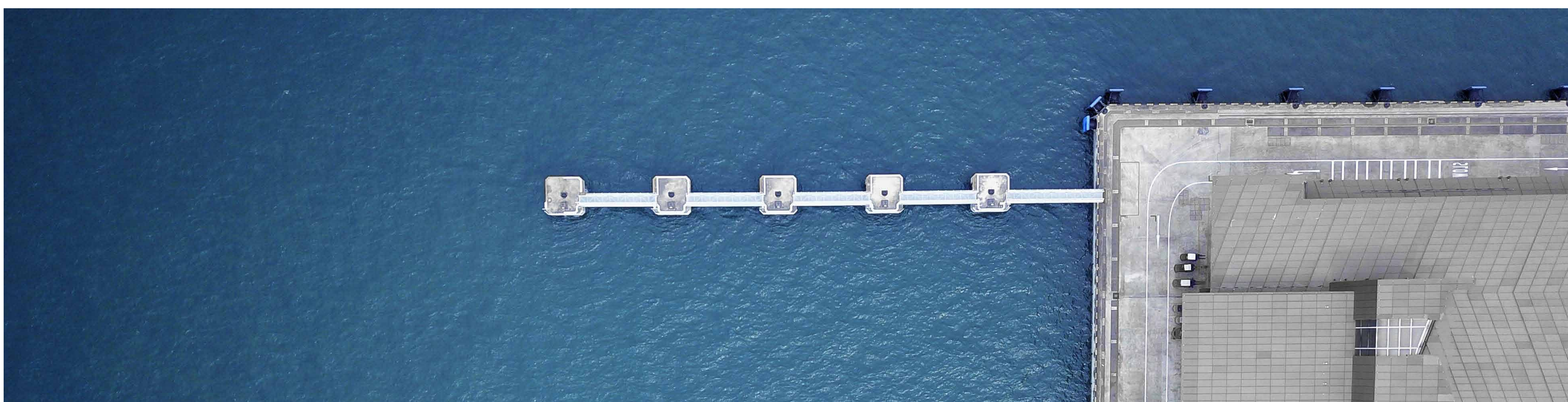
The ELLAKTOR Corporate Governance Code supports the continuity and effective operation of the Group by safeguarding the interests of all stakeholders and promoting transparency, ethical business conduct, and the responsible management of resources.

It is noted that the Corporate Governance System (CGS) is monitored and assessed periodically, at least every three (3) financial years, with respect to its implementation and effectiveness, by an independent external assessor with certified professional qualifications, in accordance with the CGS Assessment Policy approved by the Management and the relevant Procedure. Furthermore, the Corporate Governance System may also be assessed annually by the assurance functions of ELLAKTOR's Internal Control System. In compliance with the applicable legislation, the Company conducted an assessment of the adequacy and effectiveness of the Corporate Governance System of ELLAKTOR S.A. by independent statutory auditors for the period from 17 July 2021 to 31 December 2023. The assessment was completed without any «material» findings, and no corrective actions were required. It is noted that the frequency of the assessment of the Corporate Governance System is set at every three years, commencing from the reference date of the most recent assessment.

For further information regarding Corporate Governance, please refer to the 2024 Annual Financial Report, Section «B.3. Corporate Governance Statement».

Corporate Governance Policies

The Company's Board of Directors places particular emphasis on Corporate Governance matters, aiming to adopt and operate systems and processes that optimise the Corporate Governance System. Within this context, it has adopted a number of Policies, such as the Suitability Policy for members of the Board of Directors, the Conflict of Interest Policy, the Remuneration Policy, the Corporate Governance System (CGS) Assessment Policy, the Rules of Operation of the Board of Directors, etc. These Policies are further specified through procedures and forms for their practical implementation.



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 Meeting of Shareholders. The Board of Directors is responsible for defining the Group's business strategy, overseeing its financial management, legally representing the Group, and managing and administering all corporate affairs, in accordance with applicable legislation and the Company's Articles of Association. It decides on all matters relating to the Group, except those falling within the exclusive competence of the General Meeting of Shareholders. As the Group's highest governing body, the Board of Directors sets the Company's strategic direction and supervises and oversees the management of its assets.

The roles and responsibilities of the members of the Board of Directors are clearly defined and documented in the Company's Articles of Association, the Corporate Governance Code, the Rules of Operation, the Rules of Operation of the BoD, and other official corporate documents, all of which are available on the Company's website.

The members of the Board of Directors are appointed for a five-year term, commencing on the date of the election of the initial Board of Directors (27 January 2021) and expiring on 27 January 2026. Their term concludes upon the election of a new Board of Directors by the General Meeting of Shareholders held in the year in which their term expires and may not be extended beyond six years.

In accordance with the Company's Articles of Association, the Board of Directors consists of five to eleven members, comprising both executive and non-executive members. As of 31 December 2024, the Board of Directors comprised eleven members, including one executive member and ten non-executive members, of whom four were independent non-executive members, in accordance with Article 9 of Law 4706/2020, as amended and in force.

The composition of the Company's Board of Directors as at 31 December 2024 is presented in the following diagram:

Georgios Mylonogiannis
CHAIRMAN
Non-Executive Member

Aristeidis (Aris) Xenofos
VICE CHAIRMAN
Independent
Non-Executive Member

Efthymios Bouloutas
CHIEF EXECUTIVE OFFICER
Executive Member

Konstantinos Toumpouros
Non-Executive Member

Panagiotis Kyriakopoulos
Non-Executive Member

Georgios Triantafyllou
Non-Executive Member

Georgios Prousanidis
Non-Executive Member

Ioanna Dretta
Non-Executive Member

Athina Chatzipetrou
Independent
Non-Executive Member

Dr. Evgenia (Jenny) Leivadarou
Independent
Non-Executive Member

Odysseas Christoforou
Independent
Non-Executive Member

In accordance with the ELLAKTOR S.A. Board of Directors Suitability Policy, the Company adopts and implements a diversity policy in the appointment of new members to the Board of Directors, with the aim of promoting an appropriate level of diversity within the Board and establishing a Board composed of members with diverse backgrounds. This approach seeks to bring together a broad range of qualifications, skills and experience, ensuring diversity of perspectives and expertise, while fostering constructive dialogue and informed decision-making.

As at 31 December 2024, the Board of Directors comprised eleven members, all of Greek nationality, including eight men and three women. Four members were between 30 and 50 years of age, while seven were over the age of 50. The members ranged in age from 42 to 64 years, with an average age of 55 years.

The standard deviation of the Board members' tenure was 0.64 years.

Independent members represented 36% of the Board of Directors, while non-executive members accounted for 91% of its composition. Women represented 27% of the Board. In addition, the roles of Chairman and Chief Executive Officer were held by separate individuals.

With regard to sustainability-related expertise, eight of the eleven Board members possess relevant knowledge, skills and experience in sustainability matters.

Board of Directors

11
members of Greek nationality

8 3

36 %
independent

91 %
non-executive

27%
women

Evaluation of the Board of Directors and its Committees

ELLAKTOR continuously monitors the individual and collective suitability of the members of the Board of Directors, particularly to identify cases where a reassessment of their suitability is considered necessary.

In particular, a reassessment of suitability is conducted in the following cases:

When concerns arise regarding the individual suitability of one or more Board members or the suitability of the Board's overall composition.

Where a significant event affecting the reputation of a Board member could have a material adverse impact on the Company.

Upon the occurrence of any event that may materially affect the suitability of a Board member, including cases where Board members fail to comply with the Company's Conflict of Interest Policy.

From time to time, and at least once every three (3) years, the Board of Directors may engage external advisors to facilitate a comprehensive assessment of its effectiveness.

In line with the practices set out in the Corporate Governance Code, the Nomination and Remuneration Committee conducted a market review and subsequently engaged an external consultant to assess the performance and effectiveness of the Company's Board of Directors. The assessment is currently in progress.

Board of Directors & Board Committee Meetings in 2024

36
Board of Directors

11
Audit Committee

6
Nomination and Remuneration Committee

2
Strategic Planning Committee

3
Sustainable Development Committee

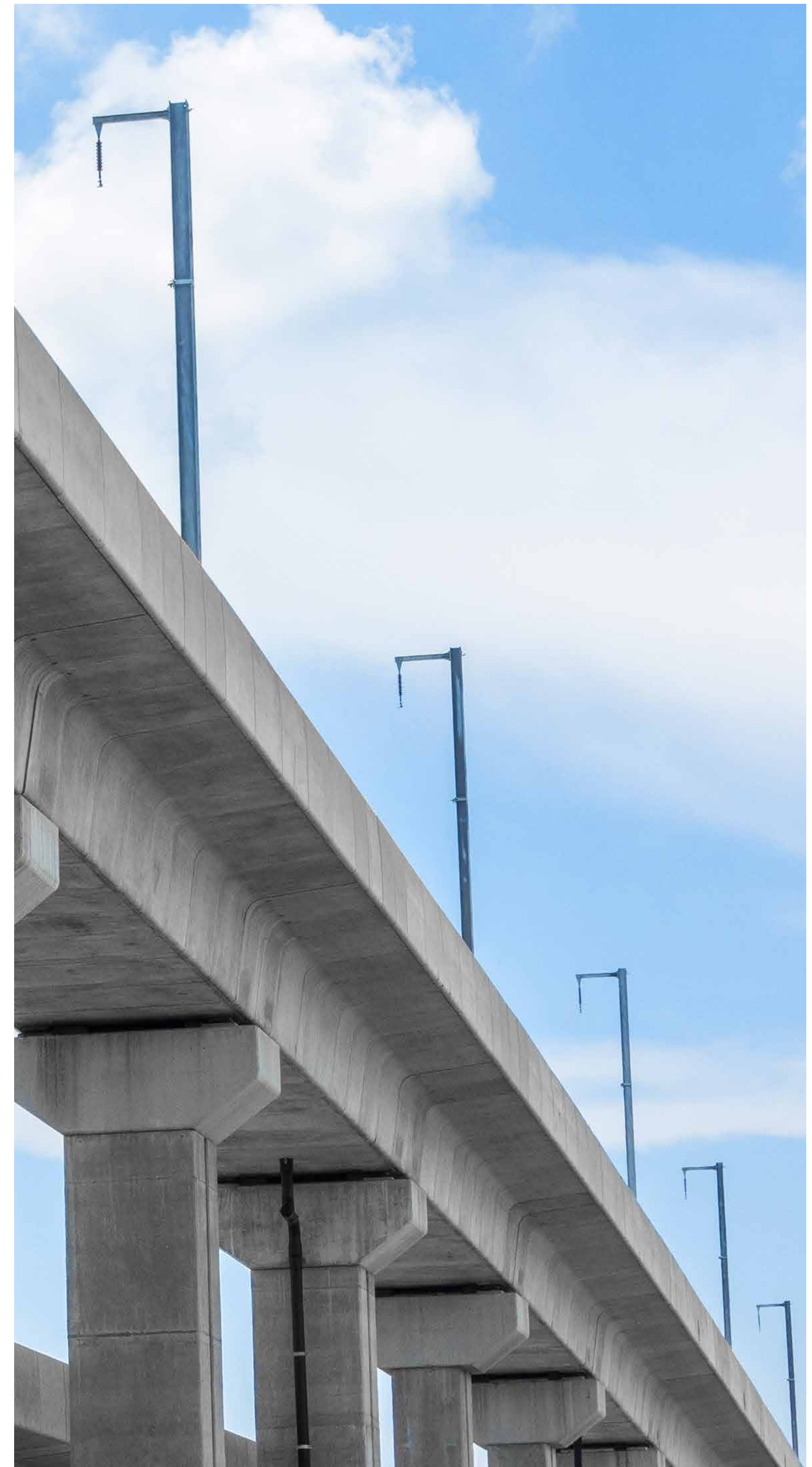
Audit Committee

The purpose of the Audit Committee is to assist the Board of Directors in relation to the monitoring and oversight of: (a) financial reporting, (b) internal control systems, (c) the Internal Audit, Risk Management and Regulatory Compliance functions and, in general, the effective governance of the Company and its subsidiaries under its control, in accordance with the provisions of the applicable legislation, and (d) the statutory auditors.

The composition of the Audit Committee as at the date of publication of this Report is presented in the following table:

Panagiotis Alamanos	Chair of the Committee (Independent Third Party)
Athina Chatzipetrou	Member of the Committee (Independent Non-Executive Member of the Board of Directors)
Dr. Evgenia (Jenny) Leivadarou	Member of the Committee (Independent Non-Executive Member of the Board of Directors)

Further information on the composition and operation of the Audit Committee is available on the Group's website and in the 2024 Annual Financial Report.



Nomination and Remuneration Committee

The purpose of the Nomination and Remuneration Committee is to assist the Board of Directors, on the one hand, in the implementation of the Company's Remuneration Policy, in accordance with prevailing market practices regarding remuneration levels and human resources management and, on the other hand, where necessary, to recommend to the Board of Directors persons suitable for appointment as members of the Board of Directors.

The composition of the Nomination and Remuneration Committee as at the date of publication of this Report is presented in the following table:

Athina Chatzipetrou	Chair of the Committee (Independent Non-Executive Member of the Board of Directors)
Aristeidis (Aris) Xenofos	Member of the Committee (Independent Non-Executive Member of the Board of Directors)
Odysseas Christoforou	Member of the Committee (Independent Non-Executive Member of the Board of Directors)
Dr. Evgenia (Jenny) Leivadarou	Member of the Committee (Independent Non-Executive Member of the Board of Directors)

Further information on the composition and operation of the Nomination and Remuneration Committee is available on the Group's website and in the 2024 Annual Financial Report.

Strategic Planning Committee

The Strategic Planning Committee is responsible for evaluating and monitoring the implementation of the Group's budget and business plan, reviewing proposals for new business activities and investments, as well as exploring potential new areas for growth.

The composition of the Strategic Planning Committee as at the date of publication of this Report is set out below:

Efthymios Bouloutas	Chair of the Committee (Chief Executive Officer – 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)

Further information on the composition and operation of the Strategic Planning Committee is available on the Group's website and in the 2024 Annual Financial Report.

Sustainable Development Committee

The Sustainable Development Committee consists of the Chairman of the Board of Directors, the Chief Executive Officer, an Independent Non-Executive Member of the Board of Directors with expertise in natural resources management and the energy transition, and the Head of Group Strategy.

Georgios Mylonogiannis	Chair of the Committee (Non-Executive Member of the Board of Directors)
Efthymios Bouloutas	Member of the Committee (Chief Executive Officer – Executive Member of the Board of Directors)
Dr. Evgenia (Jenny) Leivadarou	Member of the Committee (Independent Non-Executive Member of the Board of Directors)
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, while 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 Sustainable Development Roadmap, assessing the effectiveness of the Sustainable Development Policy approved by the Board of Directors, and ensuring the availability of the resources required for its implementation.

In addition, the Committee oversees the Group's sustainable development initiatives and the alignment of environmental and social practices with both the Group's Sustainable Development Strategy and the policies approved by the Board of Directors.

At a relevant meeting, the Board of Directors assigned to the Sustainable Development Committee the responsibilities set out in paragraphs 3(a) and 3(b) of Article 43 of Law 5164/12.12.2024. These responsibilities include, among others, monitoring and overseeing matters relating to the Group's sustainable development, reviewing and making recommendations to the Board of Directors on the Sustainability Statement, and, in general, taking any further action and performing any act related to the preparation and submission of sustainability reports and ensuring their submission.

The Sustainable Development Committee was informed of the latest developments regarding sustainability reporting, in accordance with the European Union's Corporate Sustainability Reporting Directive (CSRD) and its transposition into Greek legislation through Law 5164/2024. The legislation introduces the obligation to publish sustainability reports as part of the (consolidated) management report in a separate dedicated section, including detailed disclosures on how sustainability matters affect the Company's business activities, as well as the impacts of the Company's activities on people and the environment (the Double Materiality Assessment).

Further information on the composition and operation of the Sustainable Development Committee is available on the Group's website and in the 2024 Annual Financial Report.

Compliance

Compliance is an independent function within the Group that contributes to the promotion of sound corporate governance practices and standards of integrity. Its primary mission is to establish and implement appropriate and up-to-date policies and procedures to ensure the Group's full and continuous compliance with the applicable regulatory and legislative framework, as well as with the internal regulations governing the Group's operations.

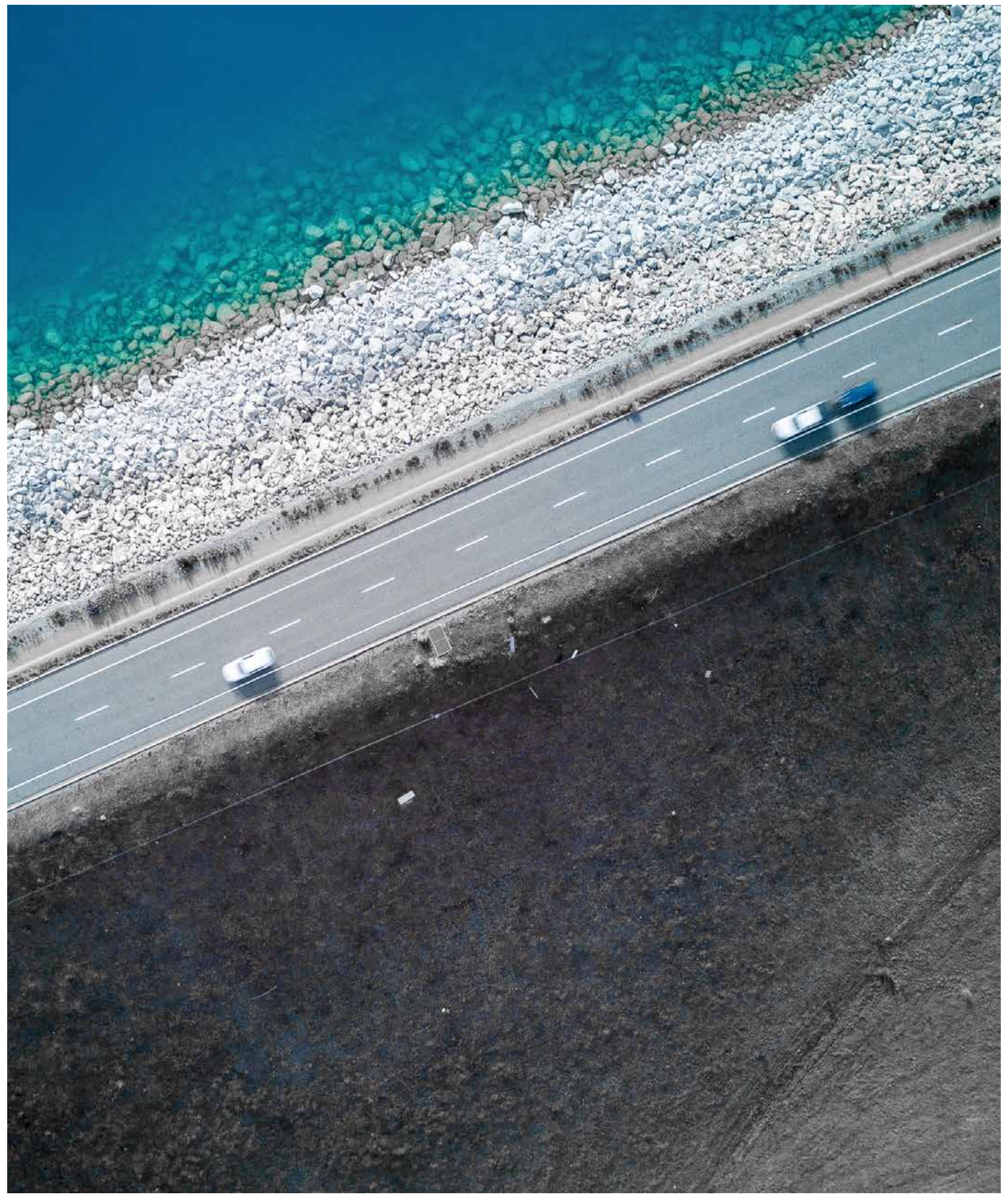
The Compliance function, which is responsible for the design and implementation of the Compliance Management System, reports to the Group's Board of Directors through the Vice Chairman, demonstrating the Group's clear commitment to integrity and transparency. Management ensures that the Group's business activities comply with the applicable regulatory framework and fosters a climate of trust with all stakeholders by maintaining a zero-tolerance approach to instances of non-compliance.

The principal risks identified relate to legal or regulatory sanctions, human rights violations, environmental or social issues, as well as the ineffective management of reports. These risks are addressed through policies, procedures, training programmes and scheduled audits.

The Group has developed a Compliance Management System with the aim of strengthening its corporate culture and focusing on its future priorities. To this end, it has established specific priorities and objectives relating to integrity and compliance, which are incorporated into the annual Compliance Action Plan and are fully aligned with the Group's corporate values.

The Compliance Management System is certified in accordance with ISO 37301:2021 and incorporates the ISO 37001:2016 Anti-Bribery Management System and the ISO 37002:2021 Whistleblowing Management System, both of which are also certified.

For further information on Compliance within the ELLAKTOR Group, please refer to Section B.4.4 "Governance" of the 2024 Annual Financial Report.



Compliance Programme for Integrity

To ensure the effective implementation of its Compliance Management System, the ELLAKTOR Group has developed a Compliance Programme for Integrity, which includes compliance measures and control mechanisms designed to ensure full compliance with the applicable legislation and regulatory framework.

Recognising the importance of knowledge sharing and the exchange of best practices, the Group has implemented a range of related initiatives, including:

- design and implementation of the annual employee training programme,
- design and implementation of a risk-based compliance audit/internal inspection programme,
- development and implementation of the Anti-Corruption Policy,
- development and implementation of the Third-Party Due Diligence Policy.

ELLAKTOR Group openly demonstrates its commitment to conducting business with transparency and integrity by adopting specific corporate governance policies and practices and maintaining its participation in the Association of Certified Fraud Examiners (ACFE) Corporate Alliance Programme to combat fraud.

Codes & Policies

To support the implementation of the Compliance Management System, the Group has developed and implemented a set of governance documents (e.g. codes, policies, procedures and manuals) governing all of the Group's operations. More specifically, the Compliance function is implemented through the Compliance Policies, training programmes and the oversight of the documents by which the Group is contractually bound.

Integrity and Compliance are ensured through the parallel and complementary implementation, as well as the thorough and effective monitoring, of the following governance documents, which are available on the Group's website and/or the Group's intranet to ensure access by all relevant stakeholders:

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

Further information on the Compliance Programme for Integrity, as well as the above Policies and Procedures, is available in Section B.4.4.1 "Business Conduct [G1]" of the 2024 Annual Financial Report.

Anti-Corruption & Anti-Bribery

ELLAKTOR Group complies with all applicable anti-corruption laws and conducts its business activities with transparency. It should be noted that all Group companies implement an Anti-Bribery Management System certified in accordance with ISO 37001:2016. The fundamental principles relating to the prevention of corruption and bribery are set out in the Code of Ethics. Furthermore, demonstrating its commitment to a zero-tolerance approach to corruption, bribery, all forms of unethical practices and unlawful activities, the Group has adopted a dedicated Anti-Corruption Policy.

The completeness, adequacy and effectiveness of the above Management System are evidenced by the fact that, during 2024, no reports relating to corruption, bribery or anti-competitive behaviour were submitted against the Group or its employees. Furthermore, the Group did not terminate its cooperation with any employees or business partners due to such matters. In addition, no confirmed incidents relating to insider information leaks were recorded during 2024.

Conflict of Interest Policy & Procedure

The Conflict of Interest Policy aims to ensure compliance with the applicable legal and regulatory framework governing conflicts of interest, as well as with 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 business partners in identifying situations that may give rise to conflicts of interest.

In addition, the Group implements a Conflict of Interest Management Procedure, which aims to establish and apply a framework of processes, mechanisms and systems for the effective management of conflict of interest situations.

Based on the compliance review conducted during 2024, no incidents of conflict of interest were recorded.

Whistleblowing Policy & Procedure

To enable the reporting of potential violations of the Code of Ethics, the Group's Policies and applicable legislation, ELLAKTOR Group updated its Whistleblowing Policy, which establishes the principles and operating framework for receiving, handling and investigating concerns, complaints, and identified and/or anonymous reports of irregularities, omissions or unlawful acts brought to the attention of employees, customers, suppliers or other third parties.

The stages of the submission, handling, investigation, assessment, resolution and follow-up of reports are set out in the Whistleblowing Procedure.

ELLAKTOR Group provides multiple reporting channels (telephone, e-mail, the Talk2Ellaktor electronic platform, postal mail, etc.), through which reports may be submitted securely and conveniently, either on an identified or completely anonymous basis. The Talk2Ellaktor platform is administered by an independent third party.

During 2024, three (3) reports were submitted relating to verbal disputes, altercations and workplace harassment within the Group's subsidiaries.

Third-Party Due Diligence Policy

ELLAKTOR Group is committed to applying high standards of integrity across all its business operations and activities. It has established a control framework and criteria governing the establishment, continuation and monitoring of relationships with third parties, with the aim of ensuring that they comply with the Group's integrity standards and ESG (Environmental, Social and Governance) principles. The Third-Party Due Diligence Policy enables the monitoring of integrity risks arising from third parties and the assessment of their compliance with applicable laws, regulations, standards, the Group's values, ESG objectives and other applicable requirements.

In particular, prior to entering into any business relationship with business partners, due diligence procedures are carried out to identify and assess business partners involved in, among other things, incidents or cases of corruption, fraud, money laundering or similar integrity risks. In addition, for the purpose of assessing integrity risks relating to third parties and conducting relevant integrity checks, the Group also uses an electronic platform. It should also be noted that, during 2024, the Group acquired an additional platform for assessing its business partners against ESG criteria.

During 2024, no information or incidents relating to integrity, environmental matters or human rights violations involving the Group's critical business partners were identified.

Personal Data Protection

ELLAKTOR Group processes personal data in full compliance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and Law 4624/2019, with the aim of safeguarding the rights and freedoms of natural persons.

The Group's 2024 Annual Financial Report, together with the Record of Processing Activities maintained by the Group companies, sets out the principles governing all personal data processing activities carried out by the Group, the relevant obligations, the rights of data subjects and the required security measures. In addition, the Data Protection Policy includes the procedures for the Exercise of Data Subject Rights, Data Retention and Destruction, and Personal Data Breach Management.

During 2024, no incidents involving personal data breaches or non-compliance with the General Data Protection Regulation (GDPR) were recorded.

Training

ELLAKTOR Group provides the necessary resources to ensure that all employees, as well as the employees of business partners engaged in the Group's projects and activities, participate in training programmes relating to Compliance. Training is delivered on a regular basis through dedicated training programmes throughout the duration of each employment or other business relationship, both via the Group's e-learning platform, which is available to all employees, and through instructor-led training seminars.

During 2024, the Compliance Directorate designed and implemented an Integrity training programme, which was made available through the Group's e-learning platform. During the same period, two additional e-learning courses, «Whistleblowing» and «Personal Data Protection – GDPR Compliance», were also available to the Group's workforce.

In particular, during 2024, 93 hours of Compliance training were delivered to 105 employees (70 men and 35 women). Of the participants, 29% held management positions, comprising 25 men (81%) and 6 women (19%).

93
training hours on Compliance topics

105
employees

70

35

Risk Management

The Board of Directors establishes and oversees the implementation of the Corporate Governance System (CGS), which includes the Internal Control System (ICS). The latter comprises all internal control mechanisms and procedures, namely Risk Management, Internal Audit and Compliance. The Board of Directors ensures the adequate and effective operation of the Internal Control System, which primarily aims to:

- ensure the consistent implementation of the business strategy through the effective use of available resources,
- identify and manage the material risks associated with the Group's business activities and operations,
- ensure the effective operation of the Internal Audit function,
- ensure the completeness and reliability of the data and information required for the accurate and timely determination of the Company's financial position and the preparation of reliable financial statements, as well as its non-financial reporting; and
- ensure compliance with the applicable regulatory and legislative framework, as well as with the internal regulations governing the Company's operations.

In accordance with the applicable legal and regulatory requirements and the Group's organisational structure, the Group Risk Management Division reports to the Chief Executive Officer and, through the Chief Executive Officer, to the Board of Directors. It provides the Board with independent reports and updates on risk-related matters, including the level of compliance with the Risk Management Policy, the results of the review of the risk identification and assessment process (risk assessment), the effectiveness of ELLAKTOR Group's risk management and response processes (risk response), and the results of risk monitoring activities (risk monitoring), thereby providing comprehensive information on the Group's risk profile

The scope, scale and complexity of the Group's activities require a comprehensive approach to risk management. The prevention and effective management of risks constitute a key element of the Group's strategy.

To ensure the transparent, secure and reliable operation of its companies with regard to the management of business risks, Greek legislation has incorporated the provisions of Directives (EU) 2017/828 and (EU) 2017/1131. ELLAKTOR Group is fully aligned with the applicable legal and regulatory framework (Laws 4548/2018 and 4706/2020, and Hellenic Capital Market Commission Decision No. 1/891/30.9.2020) and applies the relevant requirements. In addition, its risk management procedures incorporate the principles of ISO 31000:2018, ISO 31010, ISO/IEC Guide 73, the COSO Internal Control – Integrated Framework (2013), as well as internationally recognised best practices.

Within this framework, ELLAKTOR Group has adopted an Enterprise Risk Assessment (ERA) methodology tailored to the Group's needs and business profile, promoting a common risk culture that integrates risk management into processes, operations and decision-making at all levels of the organisation. This methodology is applied across all business segments, corporate functions and operational units and comprises the following steps:

1 IDENTIFICATION

Recording of events/incidents
Identification of risks and opportunities
Risk identification

2 ANALYSIS

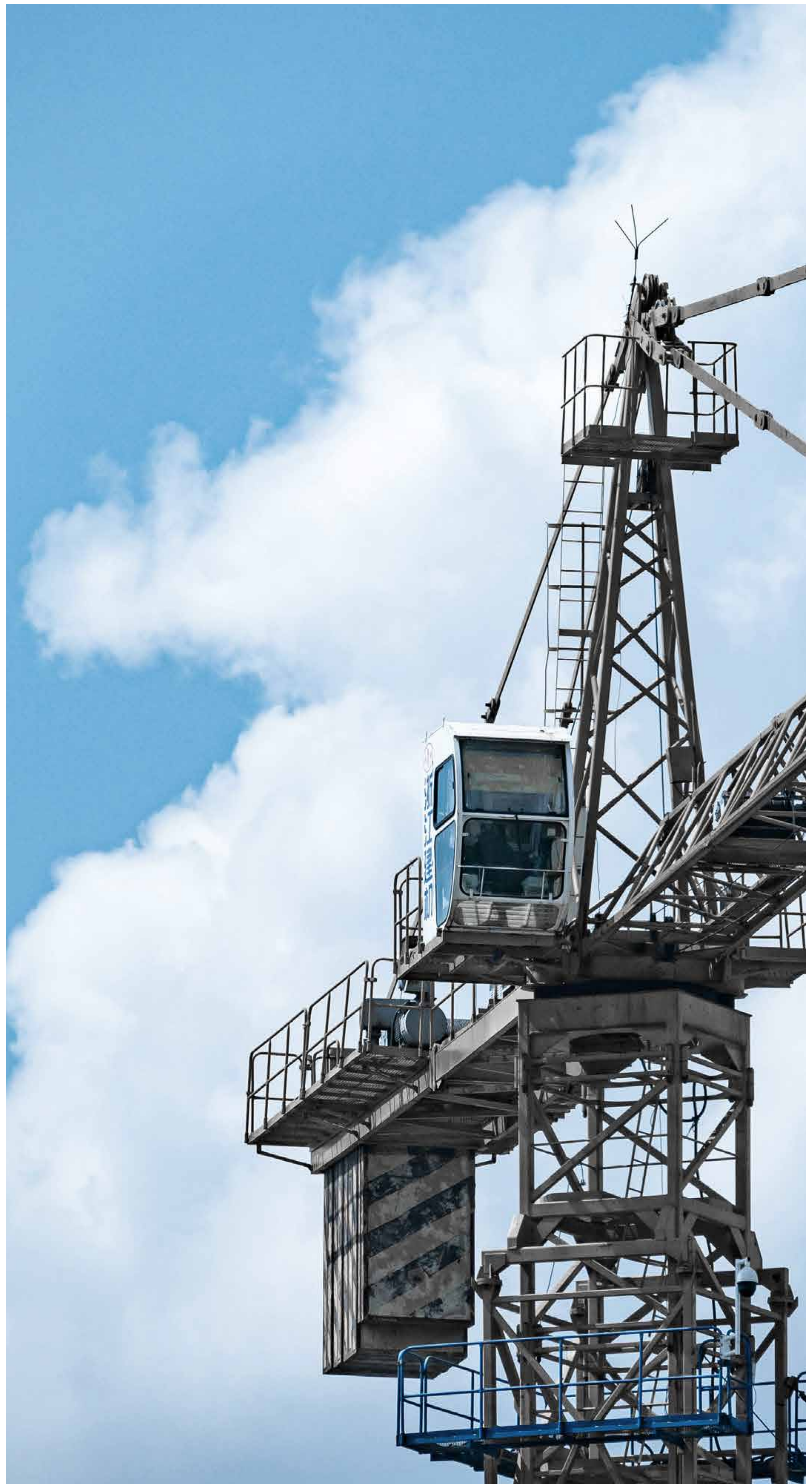
Nature and source of the risk
Consequences and opportunities
Inherent and residual risk
Qualitative and quantitative assessment

3 EVALUATION

Likelihood / frequency
Impact / consequence
Risk rating
Risk tolerance thresholds
Response options
Residual risk

4 TREATMENT

Management actions
Risk avoidance
Likelihood and/or impact mitigation
Risk transfer
Risk retention / acceptance
Monitoring and review



Risk management encompasses all processes, methodologies and procedures for the identification, recognition, analysis, evaluation and treatment of risks relating to the Group's overall activities. It is a dynamic and continuous process carried out in a coordinated manner by all personnel, irrespective of organisational level, to ensure the effective management of corporate risks. It covers all identified and assessed risks recorded in the Risk Register, while potential new risks are continuously identified within the framework of the Risk Appetite approved by the Board of Directors. The overall objective of effective risk management is to minimise, to the greatest extent possible, unexpected deviations from the Group's strategic objectives.

The Board of Directors leverages the Internal Control System (ICS) to safeguard the Group's assets, ensure that operations are conducted in accordance with the Code of Ethics, with particular emphasis on integrity through the Compliance function, assess emerging risks across all business activities, and provide shareholders with accurate and comprehensive information on the Group's actual position and future prospects. In this context, the Board oversees the identification and reporting of the Group's risk profile, as well as the measures implemented to address the risks identified. Internal Audit provides independent assurance regarding the adequacy and effectiveness of both the Compliance and Risk Management functions.

Management oversees the systematic identification and assessment of risks affecting the Group's business activities. It also approves the development and timely implementation of risk treatment plans following a detailed cost-benefit analysis. Furthermore, Management regularly evaluates the effectiveness of, and the need to update, the risk treatment plans to ensure optimal risk management.

Group companies that have implemented ISO management systems, which incorporate a risk-based thinking approach by identifying potential threats as well as opportunities associated with their activities, take these into consideration when defining their strategic objectives. The principal risk treatment strategies include risk avoidance, risk mitigation (reducing the likelihood of occurrence and/or the impact) and risk transfer, with the objective of reducing the residual risk to an acceptable level. The risks identified are primarily classified into the following main categories: geopolitical/market risks, financial risks, social, occupational health and safety (OH&S), human resources, reputation and customer-related risks, technological risks, legal and compliance risks, and environmental risks.

Strategic risk relates to the Group's business decisions, which are influenced by broader external factors considered in the decision-making process. These include the political and economic systems of the countries in which the Group operates, changes in governments and public policies that may lead to instability or population displacement, changes in legislative and regulatory frameworks, the imposition of sanctions, military conflicts, and other factors that create a continuously evolving external environment. Such developments may adversely affect the Group's activities through disruptions to the supply chain, impacts on operational and financial performance, and risks to the health and safety of employees and business partners.

ELLAKTOR Group mitigates this risk by ensuring the regular provision of timely, reliable and well-substantiated information to Management, together with continuous reporting on the progress of significant projects and the implementation of key decisions. Recognising that the quality of the information and data supporting decision-making is directly reflected in the quality of decisions, Management assesses the risks associated with its strategic choices with the support of experts and external advisors, assuming a prudent level of risk within the Group's approved Risk Appetite. Furthermore, the ongoing acceleration of broader initiatives aimed at establishing information technology-enabled processes for the monitoring and control of operations significantly enhances the internal operating environment in which management and employees are required to make decisions within their respective areas of responsibility.

Operational risk is inherent in all of the Group's activities and may arise from inadequate or ineffective processes and insufficient internal controls. It is mitigated through the establishment of documented procedures covering all Group activities and functions, incorporating the required principles of dual control and segregation of duties. In particular, these procedures are developed with the involvement of the Information Technology Division to ensure that appropriate control mechanisms and safeguards are embedded in the Group's systems and processes, preventing or mitigating risks through lean and digital processes. At the same time, targeted employee training on these procedures strengthens their effective implementation and consistent application, thereby preventing and mitigating the associated operational risks.

Financial risk generally relates to any factor that may have a direct impact on the Group's financial statements and financial performance. It is managed through the development and implementation of dedicated procedures covering all functions of the Finance Division, with particular emphasis on the collection of verified information for the preparation of the financial statements (including, in addition to the statement of profit or loss and the statement of cash flows), the recording and management of assets, the processing and payment of all types of expenditures, compliance with tax legislation, cash and liquidity management, the coordinated management of the Group's overall banking relationships (including the renegotiation of pricing and other terms and conditions to optimise benefits for the Group), as well as the monitoring of cash flows by business activity.

More specifically, the following targeted mitigation measures are implemented:

- **Liquidity risk:** managed through weekly cash flow planning based on a rolling 30-day forecast, as well as monthly liquidity planning covering a six-month period, in accordance with the Accounting Department's established procedures,
- **Interest rate risk:** mitigated through hedging covering almost the entire long-term debt portfolio,
- **Foreign exchange risk:** minimised by matching receivables and liabilities denominated in the same currency (e.g. matching receivables with the repayment of a loan in the same currency),
- **Credit risk:** remains limited, as the Group's counterparties primarily comprise public sector entities and a limited number of private counterparties with verified creditworthiness.

Compliance risk relates to the failure to maintain compliance with applicable legal and regulatory requirements across business, contractual, employment, social, environmental, and product- and service-related activities. A detailed description of the Group's approach to managing and responding to this risk is provided in the «Compliance» section.

Further information on the Group's approach to managing and responding to climate change risks is provided in the «Environment» section.

Further information on risks related to sustainability reporting is available in Section B.4.1.4 «ELLAKTOR Group Sustainable Development Governance» of the 2024 Annual Financial Report.

Risk Profile

The risk profile is aligned with the nature of the Group's activities and supports the achievement of the Company's/Group's business objectives, while remaining within the established Risk Appetite. The Risk Appetite is reviewed periodically, or whenever necessary, to reflect new business activities and changes in the internal and external environment. The Risk Register is reviewed at least annually to reflect new incidents, events and changes, both in terms of the risks it includes and the assessment of the risk likelihood and risk impact parameters that determine the significance of each risk.

In addition, the Group's Risk Register incorporates any risks identified through the Double Materiality Assessment that have not already been recorded. Such risks are included in the Register during its next review, in accordance with the Group's internal risk management procedures.

Risk Appetite

The Group's Management has defined the organisation's Risk Appetite across the principal risk categories. These categories are set out in the Risk Taxonomy, which has been developed as part of a systematic approach to identifying and categorising circumstances or events that could adversely affect the Group's strategy and objectives or impair its ability to achieve them.

Risk responses may be of three types: preventive, through the implementation of control points designed to prevent issues before they arise; corrective, whereby corrective mechanisms are activated once an issue has occurred; or combined, incorporating both preventive and corrective measures. The Group's attitude towards a particular risk may range from risk aversion, risk avoidance, risk tolerance, risk neutrality, ad hoc management, or risk seeking, depending on the Group's business strategy and objectives. Risk response comprises the management actions selected for implementation in relation to a specific risk, with the objective of either preventing its occurrence or mitigating, to the greatest extent possible, both its likelihood and potential impact. As a result of these actions, the Group's risk profile is maintained within the Risk Appetite defined by Management for residual risks, while also taking into consideration the organisation's risk-bearing capacity

Risk Taxonomy			Risk response type (Preventive / Corrective / Combined)	Risk attitude (Risk Aversion / Risk Avoidance / Risk Tolerance / Risk Neutrality / Ad hoc / Risk Seeking)	Risk appetite	Risk response (Management Actions)
Level 1	Level 2	Level 3				
Strategic	Business Strategy	Geopolitical / Country / Market / Sector, etc.	combined	risk tolerance, ad hoc & opportunity seeking		preparation, risk identification and analysis, risk tolerance setting, risk management and opportunity seeking
	Sustainability & Climate Resilience	Sustainability Disclosures and Sustainable Development	combined	avoidance		policies, procedures, actions, reporting systems, communication and training, corporate culture
	Reputation & Customers	-	combined	avoidance		
Operational	Human Resources / Operational Capability / Supply Chain / Project Management / Business Systems / BCP / Business Transformation & Organisation	-	combined	avoidance & ad hoc		policies and procedures, monitoring of compliance therewith, continuous communication and training, addressing new circumstances, vigilance for the prompt management of individual risks
	Information Systems	Cybersecurity / Ethical Hacking / IT Risk Management / Data Security / Digital Transformation / DRP, etc.	combined	avoidance & ad hoc		

Risk Taxonomy			Risk response type (Preventive / Corrective / Combined)	Risk attitude (Risk Aversion / Risk Avoidance / Risk Tolerance / Risk Neutrality / Ad hoc / Risk Seeking)	Risk appetite	Risk response (Management Actions)
Level 1	**Level 2**	**Level 3**				
Financial	Credit / Liquidity / Interest Rate / Foreign Exchange / Cost Control	-	combined	risk avoidance & ad hoc		policies and procedures, monitoring of their implementation, continuous communication, vigilance for the prompt management of challenges arising from the high volatility of the broader economic environment
Compliance	Regulatory	Privacy-– GDPR / Corporate Governance / Anti-corruption (Integrity & Transparency)	combined	risk aversion & risk avoidance		policies and procedures, monitoring of their implementation, continuous communication and training, corporate culture, initiatives, leveraging technology to improve compliance, Sustainable Development Committee, strategic structure and organisation
	Legal	Interpretation of legislation / Contracts / Litigation / etc.	corrective	risk neutrality & ad hoc		proper operation of the organisation through its Legal Department, timely participation of the Legal Department in issues, preparation of contractual terms
	Human Resources (Health & Safety)	Health & Safety, Individual and collective protection	combined	risk aversion		policies and procedures, development of the H&S Plan, ongoing training, emergency preparedness exercises, inspections for verifying standards, corporate culture

NOTE: *For the purposes of assessing the graded significance of risks, a heat map has been designed and implemented. The heat map is tailored to the Group's business profile and interprets the colours in the RISK APPETITE column as follows:*

Very Low · Low · Medium · High · Very High

In defining the Group's Risk Appetite, consideration was also given to the findings of studies assessing the most likely emerging risks, both in Greece and globally. In particular, the following were identified: (a) the five risks most likely to trigger a global crisis in 2025 are interstate armed conflicts, extreme weather events, geoeconomic confrontation, misinformation and disinformation, and societal and political polarisation; (b) the ten risks expected to have the most severe impact over the next two years are misinformation and disinformation, extreme weather events, societal polarisation, interstate armed conflicts, cyber insecurity, pollution, lack of economic opportunity, involuntary migration and geoeconomic confrontation. Over the next decade, the focus is expected to shift primarily towards environmental risks (extreme weather events, ecosystem change, biodiversity loss, natural resource shortages and pollution), followed by technology-related risks (adverse outcomes of artificial intelligence, misinformation and disinformation, and cyber insecurity) and societal risks (involuntary migration and societal polarisation).

More generally, risk management constitutes a fundamental function for ELLAKTOR Group and its subsidiaries, supporting the Group's long-term sustainability and the uninterrupted achievement of its business objectives by continuously investing in the effectiveness of its risk management framework, including the implementation of business risk management training programmes for all employees. Furthermore, the Group's and its subsidiaries' familiarity with risk management enhances their resilience and equips them with the appropriate experience and expertise to effectively respond to unforeseen circumstances.

Business Continuity

ELLAKTOR Group, through its principal companies, maintains a Business Continuity Management System (BCMS) certified by an independent certification body in accordance with the requirements of ISO 22301:2019. This certification confirms ELLAKTOR Group's ability to ensure the uninterrupted continuity of its operations and its engagement across all its projects, as well as its capability to prevent operational disruptions and protect itself against the consequences of potential emergency events.

The Group develops and maintains Business Continuity Plans (BCPs) to ensure the uninterrupted operation of all critical information systems and, consequently, its critical business functions following a potential disaster. The Business Continuity Plans are approved by Management and are reviewed regularly to ensure that they reflect, to the greatest extent possible, the Group's actual operating environment from both a technical and an organisational perspective.

The methodology used for the design and implementation of Business Continuity is based on the following principles:

The methodology used for the design and implementation of Business Continuity is based on the following principles:

The strategy is aligned with the Group's objectives and priorities

The Group's critical business functions are identified and categorised according to their priority for the Group's business activities

the information assets supporting the Group's critical business functions are identified, and the maximum recovery time together with the required technical procedures (Disaster Recovery Plan – DRP) are determined

the risks affecting the above information assets, as well as the business impacts arising from the materialisation of the relevant threats, are identified and used in the development of the Business Continuity Plans (BCPs)

In particular, ATTIKES DIADROMES S.A., within the framework of ISO 22301:2019 (Business Continuity Management System certification), monitors and reviews the planning and assessment model for Business Continuity requirements applicable to its certified activities through the protection and systematic control of its infrastructure and information systems, as well as the documentation of policies, strategy and plans. In this way, the company aims to ensure the continuous operation of the motorway and toll collection services, while fully complying with recognised engineering standards and industry best practices.

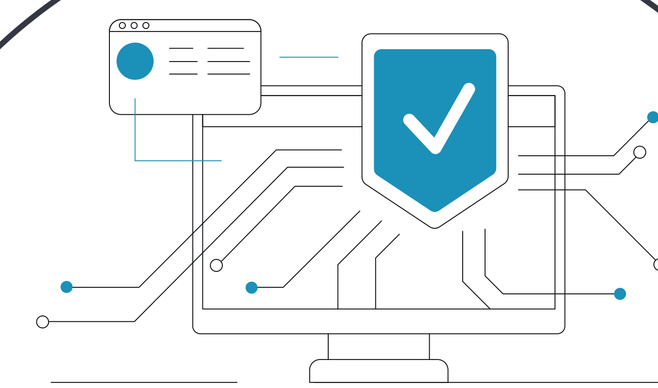
Information Systems

ELLAKTOR Group implements an Information Security Management System (ISMS) aimed at protecting the confidentiality, integrity and availability of information. The role of the Group Information Security Officer (GISO) is critical to the governance of information security, technological infrastructure and, in particular, to informing the Group's Management and employees.

The Information Security Management System, consisting of policies, procedures and systems, manages the level of operational risk arising from the Group's reliance on information systems and ensures, to the greatest extent possible, the accuracy and reliability of the financial information provided.

The individual Policies and Procedures ensure critical functions, including:

- User and Access Rights Management
- Password Management
- Backup and Recovery Management
- Information Security Incident Management
- Remote Working
- Regular vulnerability assessments and penetration testing
- Physical security of information systems infrastructure
- End-user training



In addition, the Group's information technology infrastructure incorporates specialised security systems and technical mechanisms, including:

- Next-Generation Firewall (NGFW)
- Intrusion Prevention System (IPS)
- Web Security Gateway
- Advanced Endpoint Protection System
- Email Security System
- Network Access Control (NAC)
- Vulnerability Assessment System
- Security Information and Event Management (SIEM) System
- Ransomware Protection Mechanism (File Encryption Protection)

In the event of information security incidents, the approved incident management procedures are followed. Where deemed necessary, the Business Continuity Plans (BCPs) and Emergency Response Plans may be activated. These plans are reviewed regularly, and their effectiveness is tested at regular intervals. In addition, both internal and external assessments are conducted to identify vulnerabilities, and appropriate technical measures are implemented to reduce the risks arising from such vulnerabilities.

Employee training and awareness in relation to cybersecurity are a top priority for ELLAKTOR Group. To achieve this objective, training sessions and preparedness exercises are conducted through a dedicated learning platform covering external and internal threats and risks, as well as the identification and reporting of information security incidents.

The technical security systems and mechanisms are monitored on a continuous basis (24/7) through a specialised cybersecurity service, with the objective of minimising the time required to detect and respond to information security incidents.

During 2024, no confirmed information security or cybersecurity breaches were recorded.

Emergency Response Management

In the event of an emergency, the Group's responsible Divisions coordinate their actions in cooperation with the relevant personnel of the Group's subsidiaries, as appropriate to the circumstances. The Group's objective is to achieve zero accidents, eliminate incidents and emergency situations, and ensure the continuity of project and business operations following any incident, while minimising any adverse impacts on people, the environment and local communities.

ELLAKTOR Group places particular emphasis on organisational resilience through coordinated organisational actions, namely its ability to prevent or promptly remedy operational disruptions and protect itself against the consequences of potential disasters, thereby ensuring the uninterrupted delivery of its products and services.

As part of its commitment to providing a safe working environment, Health and Safety Management Plans (HSMPs) are developed prior to the commencement of works for each project and activity of the Group, in accordance with applicable national legislation and international standards.

The Health and Safety Management Plans (HSMPs) for the Group's projects and activities include:

- Written Occupational Risk Assessment (WORA).
- Emergency Response Plan (ERP).
- Emergency Response Team (ERT).
- Group Health and Safety Instructions and Procedures.

The Emergency Response Plan (ERP), which forms part of the Health and Safety Management Plan (HSMP), is developed by identifying all potential emergency risks together with the corresponding response procedures, with the objective of ensuring the prompt and orderly restoration of normal operations. The purpose of the Emergency Response Plan is to define the actions and responsibilities within the organisational framework of each project or activity, in order to facilitate, to the greatest extent possible, the effective management of emergency incidents and to minimise the impacts arising from them.

Emergency incidents may include:

Physical injury (incident)	Fire	Severe weather conditions
Earthquake	Hazardous substance spill	Pandemic

In addition, the Group maintains an Emergency Response Plan, which is activated in the event of an emergency incident, including environmental incidents. Emergency Response Teams are established at the Group's project sites and operations to respond to and manage emergency situations. The Emergency Response Plans include actions for responding to marine incidents, floods, spills of oil, grease, fuel, liquids or hazardous waste, as well as severe weather conditions.

The Emergency Response Plan, which sets out the procedures for managing emergency situations or potential environmental accidents, specifies the required materials and resources, the designated contact persons for each type of incident, and the internal and external communication procedures

Contractual Incident Response Time (minutes)

Actual Incident Response Time (2024 average) (minutes)

Concessions Segment

An emergency incident shall be assessed and addressed immediately by the Emergency Response Team, according to its level of severity and always in accordance with the Emergency Response Plan (ERP). Following each emergency incident, the Emergency Response Plan is reviewed and, where necessary, updated and revised.

The Emergency Response Team for each project or activity is appropriately trained to respond to potential risks (such as fire, accidents and earthquakes), conducts emergency preparedness drills and, in the event of an incident, recommends the involvement of external authorities or emergency services, where required, depending on the scale and severity of the situation, such as the National Centre for Emergency Care (EKAB), the Fire Service, the Police and other competent authorities.

The details of the Emergency Response Team for each project or activity of the Group, together with the emergency response procedures, evacuation plans and designated employee assembly point, are documented in the Emergency Response Plan (ERP), as they also form part of the induction training provided to the Group's employees and subcontractors prior to the commencement of their work.

For traffic management on the MOREAS and ATTIKI ODOS motorways and for incident response, the companies cooperate, as appropriate, with all competent authorities, including the Hellenic Police, the Fire Service, the National Centre for Emergency Care (EKAB), Civil Protection, as well as with the public authorities responsible for supervising each concession project and its operation, the Regional Authorities and the Municipalities through which the motorways pass. It should be noted that all actions undertaken by the two companies are carried out in accordance with the duly approved Operation Manuals applicable to each concession project. Within this framework, large-scale tunnel emergency exercises are conducted on the MOREAS and ATTIKI ODOS motorways to assess response times and the effectiveness of the authorities involved, while identifying any issues and proposing corrective actions.

The headquarters of ATTIKI ODOS and ATTIKES DIADROMES, located in Paiania, Attica, and of MOREAS, located in Nestani, Arcadia, are designated as Independent Civil Defence Establishments approved by the Ministry of Interior. Since 2019, MOREAS has maintained an approved Internal Operating Regulation for Civil Defence and is subject to annual inspections for this purpose by the competent services of the Hellenic Police.

Value Chain

ELLAKTOR Group, through its collaboration with its business partners, aims to fully meet its operational needs while ensuring the highest quality of its projects, products and services. At the same time, the Group seeks to support local suppliers, where possible, thereby contributing to the strengthening of local markets. In 2024, 96% of the Group's procurement was sourced from local suppliers. Local suppliers are defined as suppliers whose registered office is located in the country where the respective Group activity takes place, while significant locations of operation are defined as the countries in which the Group operates and which fall within the reporting boundary of this Report.

Procurement Management

In accordance with the Group's established procurement procedures and practices, procurement activities are carried out at the company and/or project level, based on technical specifications and market research, while taking into consideration the specific local procurement requirements.

Within this framework, the Procurement Departments of the Group's companies and projects oversee procurement management activities, monitor developments and trends in the materials market, and pursue cost optimisation through economies of scale.

Percentage of purchases from local suppliers

99.9%	**Greece**
95.8%	**Abroad**
100%	**Germany**
100%	**Cyprus**
97.3%	**Romania**

Value Chain Risk Management

The Group monitors, assesses and reviews the level of impact of, among other things, the various risks associated with the value chain.

The Group's individual Procurement Departments have identified the existence of risks related to the supply chain and their potential adverse impacts and have initiated actions to manage these risks. Among the events that may significantly affect the achievement of the Group's strategic objectives and have a material impact on its operations, potentially its reputation, as well as the continuity of its business activities, the following have been identified in relation to supply continuity:

- Disruption of the flow of goods due to unavailability (interrupted continuity).
- Failure of approved suppliers to fulfil supply contracts.
- Absence of framework agreements for certain significant goods.

The Group remains prepared to address and mitigate these risks effectively by strengthening the planning and coordination of its business units, as well as through the assessment of its business partners.

Value Chain Due Diligence Systems and Procedures

The selection of suppliers/subcontractors is carried out through an open market survey and requests for product specifications and quotations from at least three different suppliers/subcontractors. Among the quotations received, the one representing the best combination of quality, price and delivery/response time is selected.

As part of the continuous enhancement and further development of the systems and operational requirements related to the supply chain, project teams have been established to drive the continuous improvement of supply chain-related matters.

ELLAKTOR Group has adopted a Business Partners Code of Conduct, which sets out its minimum requirements and expectations for the Third Parties with which it conducts business, including those within its value chain, in matters relating to responsible business conduct and sustainable development. Compliance with the Code constitutes a fundamental prerequisite for the commercial relationship between the two parties. The Code is aligned with the United Nations Sustainable Development Goals (SDGs). More specifically, under the Code, Third Parties are required to apply the highest standards of integrity, embracing the following principles:

- Ethical business practices (maintaining accurate financial records, refraining from improper influence, operating with transparency, avoiding conflicts of interest, promoting fair competition, and protecting information and personal data).
- Promoting a healthy and safe working environment.
- Respecting human and labour rights.
- Protecting the environment.
- Demonstrating social responsibility.

It is worth noting that ELLAKTOR Group has acquired an internationally recognised tool to strengthen the Third-Party Due Diligence process across all its business segments. The tool incorporates a risk-based assessment process for business partners, as well as their continuous monitoring throughout the business relationship, and focuses, among other things, on anti-bribery and corruption, adverse media, sanctions, cybersecurity, environmental and social matters. In addition, the Group has focused on incorporating ESG-related clauses into its supplier contracts.

Business Partner Assessment

Through the implementation of the Third-Party Due Diligence Policy, the Group monitors integrity risks arising from Third Parties and assesses their compliance with applicable laws, regulations, standards, values, ESG objectives and other applicable requirements.

More specifically, prior to entering into any business relationship with customers, subcontractors, suppliers, consultants and other business partners, integrity due diligence procedures are applied to identify and assess business partners involved, among other things, in incidents and cases of corruption, fraud, international trade sanctions, as well as risks related to Environmental, Social and Governance (ESG) matters. The risk-based assessment of Third Parties is also carried out through the use of an electronic platform providing access to information including identification data, geographic risk information, financial data, business sectors, politically exposed persons (PEPs), sanctions and other watchlists, as well as legal and regulatory violations. At the same time, the platform enables the continuous monitoring of Third Parties throughout the duration of the business relationship. It is worth noting that, in 2024, the Group additionally acquired a platform for assessing its business partners against ESG criteria.

During 2024, no information or incidents relating to integrity, environmental matters or human rights violations involving the Group's critical business partners were identified.

Innovation & Digital Transformation

Innovation

For ELLAKTOR Group, fostering innovation is an integral part of its strategy, accelerating the transformation of the business segments in which it operates. To develop innovative solutions and scale them appropriately in order to achieve the expected benefits, the Group works closely with all its business segments, focusing on research programmes and collaborations that are relevant to its areas of activity.

To this end, the Group participates in research programmes and seeks new collaborations with technology companies and universities in order to transfer know-how from the research stage to operational implementation under real-life conditions. The main areas of interest include energy management in buildings and concession projects, adaptation and resilience to the impacts of climate change, the promotion of the circular economy, and the application of robotic technologies both for emergency response in critical infrastructure and for routine maintenance and repair activities.

In 2024, ELLAKTOR Group participated in three research projects.

Research Projects

The research programmes in which the Group's companies participate, seeking innovative solutions to improve their operations while simultaneously developing new products and services, are presented below.

ELLAKTOR S.A.

«Wood2Wood» (W2W) Research Project – Transitioning to a Circular Economy

ELLAKTOR Group, in collaboration with the Institute of Communication and Computer Systems (ICCS) and other recognised organisations, participates in the «Wood2Wood» (W2W) project, a 48-month research initiative launched in 2024. The objective of the project is to develop an integrated framework for the utilisation of wood originating either from demolition and deconstruction activities associated with construction works or from discarded furniture, as this material represents a significant proportion of the annual waste generated across the countries of the European Union. Through advanced wood separation and sorting technologies, appropriate recycling processes and the use of digital tools, W2W aims to reduce the demand for virgin materials, minimise the amount of waste disposed of in landfills, create value-added secondary products and support the transition towards a circular economy. All project activities are progressing steadily and remain on schedule, while also enabling project partners to participate in exhibitions and webinars aimed at raising awareness among the public and specific sectors of the economy about the research and its outcomes.

CONCESSIONS SEGMENT

The Concessions Segment participates in three research projects through ATTIKES DIADROMES and MOREAS. More specifically, ATTIKES DIADROMES participates in one research project under European research programmes, while MOREAS participates in one long-term research programme in collaboration with the National Technical University of Athens (NTUA).

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 through a federated network of platforms for multimodal passenger and freight transport. The network is designed to enable the seamless and secure cross-sectoral sharing of multimodal passenger and freight transport data, as well as traffic management system information. In addition, DELPHI will employ innovative and highly efficient traffic monitoring methodologies and leverage different transport modes to support hybrid passenger and freight transport across various types of ecosystems. The project's digital framework and cross-cutting tools will be validated through four pilot demonstrations, one of which will be implemented in Athens, each with complementary requirements and characteristics. The project involves the participation of 16 companies and organisations, including ATTIKES DIADROMES, STASY (Urban Rail Transport S.A.), and the Institute of Communication and Computer Systems (ICCS). The research project commenced 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 entitled «Monitoring and Evaluation of the Functional and Structural Condition of the MOREAS Motorway Pavements», carried out by members of the research team of the Laboratory of Highway Engineering of the National Technical University of Athens (NTUA). The objective of the research project is twofold: to support MOREAS in preventive maintenance planning and decision-making for the management of motorway pavements, and to advance research on pavement performance and behaviour. It should be noted that this project is a continuation of the earlier research project entitled «Development of a Monitoring and Evaluation Framework for the Structural and Functional Condition of Motorway Pavements», during which the monitoring and evaluation platform for the motorway pavements was developed. The annual research report constitutes the project's main deliverable and presents the results of the analysis and evaluation of the data collected through field measurements of the structural and functional characteristics of the motorway pavements during each year. Field measurements and research activities are carried out using the Pavement Monitoring System (PMS) of the NTUA Laboratory of Highway Engineering, which comprises advanced high-technology equipment based on Non-Destructive Testing (NDT) systems.

Innovative Solutions and Services

Since November 2020, ATTIKI ODOS subscribers, as well as all electronic toll users holding an electronic transponder, have been able to use their transponder across the entire Greek motorway network through the Greek Interoperable Tolling System (GRITS). This has contributed to increasing the use of electronic toll collection across all motorways in Greece by enabling faster toll transactions and reducing delays, thereby enhancing the level of service provided to motorway users. Specifically, on ATTIKI ODOS, nearly 60% of all vehicle passages are made using electronic transponders, while on the MOREAS motorway the corresponding percentage reaches 45.4%.

Digital Transformation

Digital transformation is a key pillar of ELLAKTOR Group's strategy, aiming to deliver user-friendly digital services tailored to the needs of the business. It seeks to enhance productivity by improving the way the organisation operates, while increasing the quality and speed of information collection. Through the use of technology, processes are automated and become more efficient, enabling employees to focus on more value-added and advanced tasks. In 2024, the Group invested €619 thousand in digital transformation initiatives.

To achieve this, the Group's Information Technology Division applies agile approaches to the design and implementation of new digital solutions, integrating innovative methodologies and cutting-edge technologies across multiple areas of the business.

The Group's digital transformation encompasses the following areas:

- Access to corporate information through mobile devices and tablets.
- Cloud technologies to enhance flexibility, reliability, security and reduce operating costs.
- Data analytics and reporting to support decision-making.
- Internet of Things (IoT) in operations.
- Robotics and process automation.
- Artificial Intelligence (AI).
- Cybersecurity.

ELLAKTOR Group aims to fully leverage the opportunities offered by digital transformation and to develop the relevant knowledge and skills across all levels of the organisation, fostering a working environment that is well equipped to embrace the digital era and the opportunities it presents.

The Group's strategy for the adoption and implementation of digital transformation across its operations is based on a **«Cloud First»** approach. Under this approach, the Information Technology Division gives priority to cloud technologies when implementing new business requirements, thereby avoiding investments in on-premises infrastructure and the development of costly data centres.

In particular, for business segments such as the operation of production facilities, where the level of activity is not constant but depends directly on the number of projects being executed at any given time, cloud technology makes a significant contribution by enabling the scalable allocation and deallocation of computing resources as required, thereby avoiding the commitment of capital to infrastructure that may remain underutilised for extended periods.

To support this strategy, the Group has established a strategic partnership with Microsoft, as well as with other providers of advanced technology solutions, leveraging their services to implement its digital transformation initiatives and accelerate its transition to the cloud.

To date, the Group has implemented a range of cloud-based solutions, including electronic mail, user file storage, collaboration workspaces (SharePoint), secure internet access, and a variety of business applications, such as the corporate portal.

The Group's digital transformation is an ongoing journey that places strong emphasis on change, not only in terms of technology but, more importantly, in the way people work. It requires a shift in mindset, enabling employees to adopt new approaches and ways of thinking in relation to existing processes and business practices. It is evident that the key enabler is not the technology itself, but the human factor and the way people interact with new technologies, with the aim of improving efficiency by allowing them to focus on higher-value activities rather than routine and repetitive tasks.

Indicative examples include the following:

Cloud computing

The Group's use of **cloud computing** infrastructure offers several advantages, including:

- **Flexibility:** Cloud infrastructure enables users to adapt their computing requirements and scale resources according to their needs. This allows the business to respond quickly to changing market conditions and operational requirements.
- **Security:** The Group's selected cloud service providers offer secure data storage and processing services, supported by continuous updates and enhanced security measures, enabling users to store and process their data securely.
- **Accessibility:** Users can securely access cloud services from anywhere with an internet connection, enabling employees to work remotely and access business services from any internet-connected device.
- **Cost efficiency:** Through the economies of scale achieved by cloud service providers, cloud services offer a more cost-effective solution.

The use of modern cloud technologies, such as Infrastructure as a Service (IaaS), Platform as a Service (PaaS) and Software as a Service (SaaS), provides a cost-effective, secure and flexible digital infrastructure for computing and data storage. These technologies enable companies to scale their computing resources up or down according to the number of projects under execution and the size of their workforce at any given time.

Secondary Data Centre

The operation of a **secondary data centre** in the cloud, using Microsoft technologies, enables the Group to maintain business continuity by restoring critical IT services within a short period of time in the event of the complete loss of its primary physical data centre.

Security Information and Event Management (SIEM)

The use of **advanced Security Information and Event Management (SIEM) technologies** enables the Group to detect potential attempts to compromise its information, including data breaches and phishing attacks targeting employees. SIEM is a security solution that combines the collection, correlation, analysis and response to security data and security-related events across the corporate environment, thereby strengthening the Group's information security capabilities.

SIEM continuously collects security data from a wide range of network and system sources, as well as user behaviour information. The collected data are then analysed and correlated with external threat intelligence sources and threat patterns to identify anomalies, potential threats and security risks. Based on this analysis, the SIEM platform triggers alerts or automated response actions, such as notifying security personnel, isolating affected systems or blocking access from suspicious IP addresses. By leveraging SIEM capabilities, the Group is able to continuously assess its security posture and promptly identify potential risks, as well as internal and external threats.

Backup and Recovery

The enhancement of the Group's **backup process** through cloud technologies has eliminated the need for tape-based backups, making backup creation and recovery faster, more cost-effective and more reliable.

Virtualisation Technologies

The transition to **virtual machine (VM)** technologies enhances the availability, reliability and security of the Group's IT infrastructure. The use of virtualisation enables more efficient and cost-effective management of the technology resources required to support business services. In addition, it provides scalability, high availability and the rapid provisioning of new virtual machines.

Electronic Document Management, Workflow and Retrieval.

ELLAKTOR Group's Electronic **Document Management System (EDMS)** comprises a set of processes and technological solutions used to manage the Group's documents and records. Its objective is to support efficient document management while addressing increasing challenges related to regulatory compliance, information security, time and cost efficiency, and data availability. Through this dedicated application, documents are securely routed to authorised users through electronic workflows and are systematically organised using metadata, enabling their efficient retrieval and search.

E-learning platform

A **platform for the electronic training** of employees. The Group's Information Technology Division, in collaboration with the Human Resources Division, has developed a dedicated e-learning platform to support employee training by providing role-based learning programmes, together with the necessary supporting

ESG monitoring platform

The operation of an **ESG platform** for the collection, management and analysis of sustainability performance data from the Group's companies.

New Human Resources Management Platform

Based on the needs of the Group and its companies, the implementation of a new **Human Resources Management Platform (HRMS)** has commenced and is currently well underway. The platform is intended to serve as the Group's single source of truth for employee information while supporting the automation of a wide range of HR processes, including performance evaluations, leave management and other human resources functions.

Other Digital Applications

- **Data analytics**, using advanced analytical techniques on raw data, provides an accurate and timely view of project progress, enabling each Group company to take corrective actions whenever necessary.
- The use of **electronic signatures** for contractual documents enhances flexibility and accelerates related business processes.
- **Cloud-based services** are used to manage new employee onboarding through a dedicated platform.
- **Mobile technologies**, combined with secure access to data from any location, provide greater flexibility and enable faster decision-making.

Annex

Report Methodology

The purpose of the Sustainable Development Report is to fully and comprehensively capture and inform the stakeholders of ELLAKTOR Group, regarding the Group's performance in ESG and sustainable development issues in 2024, as well as its strategy on these issues and the relevant objectives that have been set.

The responsibility for collecting the data of the Report lies with the Group's ESG Strategy & Sustainable Development Division.

The 2024 Sustainability Report covers the reporting period from 1 January 2024 to 31 December 2024 and includes all Group companies operating in Greece and abroad (Germany, Cyprus, and Romania), subject to the clarifications provided below. The companies included in the 2024 Sustainability Report represent 99.8% of the Group's total revenue from its business activities (Real Estate Development and Management, Concessions, and Environment). The financial results presented refer to the Group's overall operations, both within Greece and internationally.

In more detail, the following are noted for the perimeter of the Exhibition:

- The parent company and all direct and indirect subsidiaries and joint ventures have been included at 100%.
- All Joint Ventures and Associates, as listed in the Financial Report, were not incorporated because there is no operational control over these entities. Category 15 of Scope 3 includes Associates Companies.
- For ATTIKI ODOS it is noted that the data mentioned refer to the period 01.01.2024 to 05.10.2024, as on this date the Concession Period / Operation Period of the Attiki Odos motorway expired.
- On 5 December 2024, the Group's subsidiary REDS completed the acquisition of the Dutch holding company ATHENS PROPERTIES B.V., which owns 100% of the shares of ten special purpose entities (SPVs), each holding ownership of a standalone property, as well as HESTIA M.I.K.E., the property management company. The performance indicators relating to these companies have not been included in this Report.
- HELECTOR S.A. and its subsidiaries are included in the perimeter of the Report for 2024, as the Environment segment was part of the Group in 2024. HELECTOR S.A., its subsidiaries, joint ventures and joint ventures (Environment segment) will be referred to as discontinued activity.
- The differences in total energy consumption between the financial statements and this sustainability report are due to differences in the way they aggregate and calculate between the standards.
- The other companies that are not included concern inactive projects within 2024.

In addition, for the Sustainable Development data, it is clarified that:

- Where ELLAKTOR for 2024 means: ELLAKTOR S.A. and the subsidiaries belonging to the category OTHER as mentioned in the Annual Financial Report, while for 2023 and 2022 where ELLAKTOR S.A. means ELLAKTOR S.A. (chapter Environment).
- The data concerning the Group's employees in this report include the total own workforce (employees and non- employees).
- Where a comparison is possible, 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 standards of the Global Reporting Initiative (GRI Standards). In addition, the Group has implemented the eight basic principles of the GRI Standards (Accuracy, Balance, Clarity, Comparability, Completeness, Sustainability Framework, Timeliness, Verifiability). For the preparation of the Report, the 10 Principles of the UN Global Compact, the Non-Financial Disclosure Guide of the Athens Stock Exchange (ESG Disclosure Guide 2024) and the guidelines of the Sustainability Accounting Standards Board (SASB) for the «Waste Management» sector have also been taken into account. In addition, indicators mentioned in the Sustainability Statement of the 2024 Annual Financial Report have been taken into account in accordance with the ESRS standard.

In order to identify the most material issues for the Group's sustainable development, the results of the process of identifying material issues (double materiality assessment) carried out in 2024 were used.

The Report was subject to limited external assurance (see Independent Limited Scope of Assurance Report).

For any questions or further information regarding the 2024 Sustainability Report, please contact:

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Ermou 25, 14564 Nea Kifissiaά

GRI Content Index

Statement of Use	ELLAKTOR Group has prepared this Report in accordance with the GRI standards for the period 1 January 2024 - 31 December 2024
GRI 1 used	GRI 1: Foundation 2021
Sectoral GRI standards(s) applied	N/A

GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
GENERAL DISCLOSURES			
	THE ORGANISATION AND ITS REPORTING PRACTICES		
GRI 2: General Disclosures 2021	2-1 Organizational details	a. ELLAKTOR S.A. is the parent company of ELLAKTOR Group b. ELLAKTOR Public Limited Company Engineering, Holding and Services Société Anonyme c. Ermou 25, 145 64, Nea Kifissia, Greece d. **ELLAKTOR Group** / Shareholder Structure	
	2-2 Entities included in the organization's sustainability reporting	**ELLAKTOR Group** / Shareholding Structure Annual Financial Report 2024 (p.383-388)	
	2-3 Reporting period, frequency and contact point	a. Reporting Period 01/01/2024 – 31/12/2024 Annual reporting frequency b. Financial Reporting Period 01/01/2024 – 31/12/2024 c. September 2025 d. **Annex** / Report Methodology	
	2-4 Restatements of information	Any restatements (where they exist) are explained by in-text comments and/or footnotes.	
	2-5 External Assurance	**Annex** / Independent Limited Assurance Report	

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GRI Standard	Δημοσιοποίηση	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
GENERAL DISCLOSURES			
GRI 2: General Disclosures 2021	ACTIVITIES AND EMPLOYEES		
	2-6 Activities, value chain and other business relationships	**ELLAKTOR Group** / Key Segments, Value Chain and Business Relationships, ELLAKTOR Group Business Model **Governance** / Value Chain	
	2-7 Employees	**Society** / Workforce, Employment	
	2-8 Workers Who Are Not Employees	31.12.2024 were employed through subcontractors, 9 employees in the Group's activities	
	GOVERNANCE		
	2-9 Governance structure and composition	Five-year term of office of the members of the Board of Directors (27.01.2021 – 27.01.2026) **Governance** / Board of Directors & Key Committees	
	2-10 Nomination and selection of the highest governance body	**Governance** / Board of Directors & Key Committees / Nomination and Remuneration Committee Annual Financial Report 2024 (pp. 84-86)	
	2-11 Chair of the highest governance body	**Governance** / Board of Directors & Main Committees Annual Financial Report 2024 (p. 61)	
	2-12 Role of the highest governance body in overseeing the management of impacts	**Governance** / Board of Directors & Key Committees / Sustainable Development Committee	
	2-13 Delegation of responsibility for managing impacts	**Governance** / Board of Directors & Key Committees / Sustainable Development Committee	
	2-14 Role of the highest governance body in sustainability reporting	**Governance** / Board of Directors & Key Committees / Sustainable Development Committee	
	2-15 Conflicts of interest	**Governance** / Compliance / Conflict of Interest Policy & Procedure	
	2-16 Communication of critical concerns	a. In accordance with the Group's Reporting and Investigation Procedure, the Head of Regulatory Compliance promptly informs the Chief Executive Officer and the Vice Chair of the Board of Directors, during the investigation stage, of any serious reports received and provides updates on their progress. In addition, the Board of Directors is informed, through the Chief Executive Officer and the Vice Chair, on an annual basis and in anonymised form, of the number, nature/subject matter, and severity of the reports through the Group's Annual Regulatory Compliance Report. Furthermore, the reporting platform is supported by an automated notification system, managed by an independent third-party provider, which notifies the Vice Chair of the Board of Directors, the Head of Legal Services (also acting as the Data Protection Officer), and the Head of Regulatory Compliance of every report submitted, regardless of its severity. b. No critical concerns were identified through the reporting procedure during the reporting period. **Governance** / Compliance / Whistleblowing Policy & Procedure	

GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
GENERAL DISCLOSURES			
GRI 2: General Disclosures 2021	2-17 Collective knowledge of the highest governance body	**Governance** / Board of Directors & Key Committees	
	2-18 Evaluation of the performance of the highest governance body	**Governance** / Board of Directors & Key Committees / Evaluation of the Board of Directors and its Committees	
	2-19 Remuneration Policies	**Governance /** Board of Directors & Key Committees / Nomination and Remuneration Committee Annual Financial Report 2024 (pp. 84-86)	
	2-20 Process to determine remuneration	**Governance /** Board of Directors & Key Committees / Nomination and Remuneration Committee Annual Financial Report 2024 (pp. 84-86)	
	2-21 Annual total compensation ratio	a/c. Annual total compensation ratio: 79.41 Annual total compensation of the Chief Executive Officer (highest-paid employee)* (€2,919,113) / Median annual total compensation of all employees** (€36,757) *Total compensation paid by ELLAKTOR S.A. ** Median gross annual compensation of ELLAKTOR S.A. employees. b/c. Percentage increase in the Chief Executive Officer's annual total compensation: 61.7% Percentage increase in the median annual total compensation of all employees: 22.4% Change in the annual total compensation ratio: 2.8	
	STRATEGY, POLICIES AND PRACTICES		
	2-22 Statement on sustainable development strategy	**ELLAKTOR Group** / Sustainable Development in ELLAKTOR Group	
	2-23 Policy commitments	**ELLAKTOR Group** / Group ESG Strategy / Contribution of ELLAKTOR Group to the Sustainable Development Goals	
	2-24 Embedding policy commitments	**ELLAKTOR Group** / Group ESG Strategy / Contribution of ELLAKTOR Group to the Sustainable Development Goals	
	2-25 Processes to remediate negative impacts	**Environment** / Environmental Management / Climate Change **Society** / Health, Safety & Employee Development **Governance** / Business Continuity	

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GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
GENERAL DISCLOSURES			
GRI 2: General Disclosures 2021	2-26 Mechanisms for seeking advice and raising concerns	**Governance** / Compliance	
	2-27 Compliance with laws and regulations	**Governance** / Compliance	
	2-28 Membership associations	**ELLAKTOR Group** / Participation in Associations and Organisations, **Annex /** Participation in Associations and Organisations	
	COMMUNICATION WITH STAKEHOLDERS		
	2-29 Approach to stakeholder engagement	**ELLAKTOR Group** / Communication with Stakeholders	
	2-30 Collective bargaining agreements	**Society** / Safeguarding Human Rights	
MATERIAL ISSUES			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	**ELLAKTOR Group** / Materiality Analysis	
	3-2 List of material topics	**ELLAKTOR Group** / Materiality Analysis	
CLIMATE CHANGE			
GRI 3: Material Topics 2021	3-3 Management of material topics	**Environment** / Climate change	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	448,216 MWh	
	302-2 Energy consumption outside the organization	25,212 MWh **Environment** / Climate Change / *Energy Consumption*	
	302-3 Energy Intensity	**Environment** / Climate Change / *Energy Consumption*	
	302-4 Reduction of energy consumption	**Environment** / Climate Change / *Energy Consumption*	

GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
MATERIAL ISSUES			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	**Environment** / Climate change / *Greenhouse gas emissions (GHGs)*	
	305-2 Energy indirect (Scope 2) GHG emissions	**Environment** / Climate change / *Greenhouse gas emissions (GHGs)*	
	305-3 Other indirect (Scope 3) GHG emissions	**Environment** / Climate change / *Greenhouse gas emissions (GHGs)*	
	305-4 GHG emissions intensity	**Environment** / Climate change / *Greenhouse gas emissions (GHGs)*	
	305-5 Reduction of GHG emissions	**Environment** / Climate change / *Energy Consumption*	
	305-6 Emissions of ozone-depleting substances (ODS)	**Environment** / Air & Soil Quality / *Air Pollutants and Air Quality*	
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	**Environment** / Air & Soil Quality / *Air Pollutants and Air Quality*	
GRI 201: Financial performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	**Environment** / Climate change	
OWN WORKFORCE			
GRI 3: Material Topics 2021	3-3 Management of material topics	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
GRI 403: Health and Safety at Work 2018	403-1 Occupational health and safety management system	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
	403-2 Hazard identification, risk assessment, and incident investigation	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
	403-3 Occupational health services	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
	403-4 Worker participation, consultation, and communication on occupational health and safety	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	

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GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
MATERIAL ISSUES			
GRI 403: Health and Safety at Work 2018	403-5 Worker training on occupational health and safety	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
	403-6 Promotion of worker health	**Society /** Health, Safety & Employee Development / *Employee Attraction and Retention*	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
	403-8 Workers covered by an occupational health and safety management system	For the Group companies where an ISO 45001 management system is implemented, all workers are covered by the system.	
	403-9 Work-related injuries	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety* **Annex** / Tables	
	403-10 Work-related ill health	**Society /** Health, Safety & Employee Development / *Occupational Health and Safety*	
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	**Society /** Health, Safety & Employee Development / *Diversity, Equity & Inclusion*	
	405-2 Ratio of basic salary and remuneration of women to men	**Basic salary ratio** Total employees: 0.84 Employees in managerial positions: 0.98 Employees in non-managerial positions: 0.86 Employees in Greece: 0.84 Employees abroad: 0.64 **Remuneration ratio** Total employees: 0.83 Employees in managerial positions: 1.04 Employees in non-managerial positions: 0.84 Employees in Greece: 0.84 Employees abroad: 0.65 **Society /** Health, Safety & Employee Development / *Diversity, Equity & Inclusion*	
GRI 410: Security Practices 2016	406-1 Incidents of discrimination and corrective actions taken	**Society /** Health, Safety & Employee Development / *Diversity, Equity & Inclusion*	
GRI 410-1: Anti-Discrimination 2016	410-1 Security personnel trained in human rights policies or procedures	100% of security personnel have been trained in human rights policies and procedures.	

GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
MATERIAL ISSUES			
BUSINESS CONDUCT			
GRI 3: Material Topics 2021	3-3 Management of material topics	**Governance** / Compliance	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	92% of the Group's operations were assessed for risks related to corruption.	
	205-2 Communication and training about anti-corruption policies and procedures	All employees with access to the Group's Portal have been informed of the relevant Group policies and procedures and have access to the relevant e-learning course. All the Group's Business Partners acknowledge the Group's Compliance Programme (Code of Ethics, Business Partners Code of Conduct, etc.) upon entering into a contract with the Group. **Society** / Health, Safety & Employee Development / *Safeguarding Human Rights* **Governance** / Compliance	
	205-3 Confirmed incidents of corruption and actions taken	**Governance** / Compliance / *Compliance Programme for Integrity*	
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	**Governance** / Compliance / *Compliance Programme for Integrity*	
GRI 415: Public Policy 2016	415-1 Political contributions	**Society** / Social Responsibility / *Social Responsibility Initiatives* No monetary or in-kind contributions were made to political parties in 2024.	
GRI 417: Marketing and Labeling 2016	417-3 Incidents of non-compliance concerning marketing communications	No incidents of non-compliance concerning marketing communications were recorded for the Group's companies in 2024.	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	**Governance** / Compliance / *Compliance Programme for Integrity*	
CONSUMERS AND END USERS			
GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	No incidents of non-compliance concerning the health and safety impacts of products and services were recorded in 2024.	

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GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
NON-MATERIAL TOPICS			
CIRCULAR ECONOMY AND WASTE MANAGEMENT			
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	**Environment** / Circular Economy and Waste Management	
	306-2 Management of significant waste-related impacts	**Environment** / Circular Economy and Waste Management	
	306-3 Waste generated	**Environment** / Circular Economy and Waste Management	
	306-4 Waste diverted from disposal	**Environment** / Circular Economy and Waste Management	
	306-5 Waste directed to disposal	**Environment** / Circular Economy and Waste Management	
COMMUNITY WELL-BEING			
GRI 3: Material Topics 2021	3-3 Management of material topics	**Society** / Social Responsibility	
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community	**Society** / Health, Safety & Employee Development / *Workforce, Employment* **Governance** / Value Chain / *Procurement Management* b. Employees managing a team and holding a position of responsibility	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	**Governance** / Value Chain / *Procurement Management*	
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Stakeholder engagement was conducted for 100% of projects subject to environmental permitting. **Society** / Social Responsibility */ Engagement with local communities*	
GRI 411: Rights of Indigenous Peoples 2016	411-1 Incidents of violations involving rights of indigenous peoples	No such incidents were reported. **Society** / Health, Safety & Employee Development */ Safeguarding Human Rights*	

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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		**Governance** / Business Continuity	
ΕΡΓΑΣΙΑΚΕΣ ΠΡΑΚΤΙΚΕΣ, ΕΚΠΑΙΔΕΥΣΗ ΚΑΙ ΑΝΑΠΤΥΞΗ			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	**Society** / Health, Safety & Employee Development / *Employment*	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	**Society** / Health, Safety & Employee Development / *Employee Attraction and Retention*	
	401-3 Parental leave	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	Average annual training hours: Employees in managerial positions: 5.25 Employees in non-managerial positions: 2.66 Employees in Greece: 3.21 Employees abroad: 0.59 **Society** / Health, Safety & Employee Development / *Employee Training and Development*	
	404-2 Programs for upgrading employee skills and transition assistance programs	**Society** / Health, Safety & Employee Development / *Employee Training and Development*	
	404-3 Percentage of employees receiving regular performance and career development reviews	**Society** / Health, Safety & Employee Development / *Employee Attraction and Retention*	
GRI 402: Labor / Management Relations 2016	402-1 Minimum notice periods regarding operational changes	3 weeks	
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	*Suppliers are covered by the Business Partner's Code of Conduct.* **Society** / Health, Safety & Employee Development / *Safeguarding Human Rights* **Governance** / Value Chain / *Value Chain Due Diligence Systems and Procedures*	

GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
NON-MATERIAL TOPICS			
USE OF NATURAL RESOURCES AND RAW MATERIALS			
GRI 301: Materials 2016	301-1 Materials used by weight or volume	**Environment** / Circular Economy / *Management of natural resources and raw materials*	
WATER AND EFFLUENT MANAGEMENT			
GRI 303: Water and Effluents 2018	303-1 Interactions with water as a shared resource	**Environment** / Water Management **Annex**/ Tables	
	303-2 Management of water discharge-related impacts	**Environment** / Water Management	
	303-3 Water withdrawal	**Environment** / Water Management **Annex** / Tables b. Although, according to the World Resources Institute Aqueduct, Greece is classified as a region experiencing high water stress, all Group projects where water is withdrawn from the environment operate under the required permits issued by the competent authorities. These permits set limits on the annual volum of water withdrawal to ensure the sustainability of the aquifer.	
	303-4 Water Discharge	**Environment** / Water Management **Annex**/ Tables	
	303-5 Water Consumption	**Environment** / Water Management	
PROMOTING SUSTAINABILITY IN THE VALUE CHAIN			
GRI 308: Supplier Environmental Assessment 2016	308-2 Negative environmental impacts in the supply chain and actions taken	In 2024, 100% of eligible business partners (third parties with annual turnover exceeding €30,000) were assessed. **Governance** / Value Chain / *Value Chain Due Diligence Systems and Procedures*	
GRI 414: Supplier Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	In 2024, 100% of eligible business partners (third parties with annual turnover exceeding €30,000) were assessed. **Governance** / Value Chain / *Business Partner Assessment*	

GRI Standard	Disclosure	Report Sections/References	Omissions (Requirements omitted, Reason, Explanation)
NON-MATERIAL TOPICS			
FOSTERING INNOVATION, RESEARCH AND DIGITAL TRANSFORMATION			
Investments in innovation, research and digital transformation		**Governance** / Our Performance / *Innovation, Digital Transformation*	
ECONOMIC VALUE CREATION AND DISTRIBUTION			
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	**ELLAKTOR Group** / Business Model / *Economic Value Generated and Distributed*	
	201-4 Financial assistance received from government	€21,941,495	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	**Society** / Social Responsibility / *Contributing to Sustainable Cities and Communities*	
PROTECTION AND CONSERVATION OF BIODIVERSITY AND ECOSYSTEM			
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	**Environment** / Biodiversity & Ecosystem Protection	
	304-3 Habitats protected or restored	**Environment** / Biodiversity & Ecosystem Protection	
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	**Environment** / Biodiversity & Ecosystem Protection	

ATHEX ESG Reporting Guide Disclosure Table

The table below presents the correspondence between the content of this Report and the indicators included in the ATHEX ESG Reporting Guide.

NON-FINANCIAL ESG RATIOS OF THE ATHENS STOCK EXCHANGE			
ATHEX Indicator	**Description**	**Additional information**	**Report Reference**
CORE METRICS			
ENVIRONMENTAL			
C-E1	Scope 1 emissions	GHG intensity of Scope 1 emissions (metric tCO_2e/m€): 44.7 Normalization factor: €353,817,793	**Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
C-E2	Scope 2 emissions	GHG intensity of Scope 2 emissions (location-based) (metric tCO_2e/m€): 62.3 GHG intensity of Scope 2 emissions (market-based) (metric tCO_2e/m€): 82.12 Normalization factor: €353,817,793	**Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
C-E3	Energy consumption and production	Total energy consumption within the organisation: 648,194 MWh Proportion of electricity consumed: 16% Proportion of energy consumed from renewable sources: 83% Total energy production: 221,405 MWh Proportion of energy produced from renewable sources: 100%	**Environment** / Climate Change / *Energy Consumption*
SOCIAL			
C-S1	Stakeholder engagement	Stakeholder engagement – Identification of the Company’s key stakeholders and analysis of the main practices implemented to ensure their engagement.	**ELLAKTOR Group** / ELLAKTOR Group Business Model / *Communication with Stakeholders*
C-S2	Female employees	25% of employees are female.	**Society /** Health, Safety & Employee Development / *Employment*

NON-FINANCIAL ESG RATIOS OF THE ATHENS STOCK EXCHANGE

ATHEX Indicator	Description	Additional information	Report Reference
CORE METRICS			
SOCIAL			
C-S3	Female employees in management positions	Female employees represent 22% of the top 10% highest-paid employees.	**Society** / Health, Safety & Employee Development / *Diversity, Equity & Inclusion*
C-S4	Employee turnover	Voluntary employee turnover: 9% Involuntary employee turnover: 7% Total employee turnover: 16%	**Society** / Health, Safety & Employee Development / *Employment*
C-S5	Employee training	Average training hours (top 10% highest-paid employees): 3.51 Average training hours (bottom 90% of employees): 2.93 Average training hours – women: 2.3 Average training hours – men: 5.1	
C-S6	Human rights policy	Human rights policy - Description of human rights policy and fundamental principles	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*
C-S7	Collective bargaining agreements	88% of employees are covered by collective bargaining agreements	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*
C-S8	Value chain	Policies related to the value chain regarding supplier assessment based on ESG criteria	**Governance /** Action Plan, Value Chain

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NON-FINANCIAL ESG RATIOS OF THE ATHENS STOCK EXCHANGE			
ATHEX Indicator	**Description**	**Additional information**	**Report Reference**
CORE METRICS			
GOVERNANCE			
C-G1	Board composition	8 out of 11 Board members possess ESG-related qualifications. The Chair of the Board is a non-executive member. Female Board members: 27% Non-executive Board members: 91% Independent non-executive Board members: 36% Total Board members: 11 Average age of Board members: 55 years Average tenure of Board members: 3.2 years	**Governance /** Corporate Governance / *Board of Directors & Key Committees* **Annual Financial Report 2024 /** Corporate Governance Statement / *Participation of the members of the Board of Directors in its Committees*
C-G2	Sustainability oversight	The ESG Strategy & Sustainable Development Division reports to the Group Strategy Division, while overall oversight of sustainability matters is exercised by the Sustainability Committee.	**ELLAKTOR Group** / Sustainable Development in ELLAKTOR Group / *Governance of Sustainable Development*
C-G3	Materiality	Description of the material topics, the materiality assessment process, changes compared to the previous reporting year, and the policies, processes and/or actions implemented to manage the material topics.	**ELLAKTOR Group /** Materiality Analysis
C-G4	Sustainability policy	Description of the Sustainability Policy and its fundamental principles.	**ELLAKTOR Group /** Sustainable Development in ELLAKTOR Group
C-G5	Business Ethics Policy	Code of Ethics and Business Partners Code of Conduct	**Society /** Health, Safety & Employee Development / *Safeguarding Human Rights* **Governance /** Compliance, Value Chain
C-G6	Data Security Policy	Data Protection Policy	Data Protection Policy
C-G7	Sustainability reporting	General basis for the preparation of the Sustainability Statement. List of entities included in the Sustainability Statement and differences compared to the entities included in the financial statements.	**Annex** / Report Methodology **Annual Financial Report 2024** / General Information / *Basis for preparation of the Sustainability Statement*
C-G8	Annual Financial reporting	Publication Date	25.04.2025

NON-FINANCIAL ESG RATIOS OF THE ATHENS STOCK EXCHANGE

ATHEX Indicator	Description	Additional information	Report Reference
ADVANCED METRICS			
ENVIRONMENTAL			
A-E1	Scope 3 emissions	GHG intensity of Scope 3 emissions (metric tCO_2e/m€): 873 Normalization factor: €353,817,793	**Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
A-E2	Climate change risks and opportunities	Description of the climate change-related risks and opportunities that may affect the Company's business activities.	**Environment** / Climate Change / *Climate Risks and Potential Financial Impacts Identification and Assessment (TCFD)*
A-E3	Waste management	Total amount of radioactive waste: 0	
A-E4	Effluent discharge	47,024 m^3	**Environment** / Water Management
A-E5	Biodiversity sensitive areas	Description of the impacts of the Company's business activities on biodiversity sensitive areas	**Environment** / Biodiversity & Ecosystem Protection
A-E6	Climate change policy	Climate change is addressed through the following policies: Environment & Energy Policy Sustainable Development Policy	**Environment** / Environmental Management / *Environment & Energy Policy* **ELLAKTOR Group** / Sustainable Development in ELLAKTOR Group / *Sustainable Development Policy*
A-E7	Removals and carbon credits	Removals: 0 Carbon credits: 0	
A-E8	Total GHG emissions	Total GHG emissions (location-based): 346,831 metric tCO_2e Total GHG emissions (market-based): 353,833 metric tCO_2e	**Annual Financial Report 2024** / Sustainability Statement / *Environmental Information / B.4.2.2 Climate Change [E1-1] / Gross Scopes 1, 2, 3 and Total GHG emissions -[E1-6]*

NON-FINANCIAL ESG RATIOS OF THE ATHENS STOCK EXCHANGE

ATHEX Indicator	Description	Additional information	Report Reference
ADVANCED METRICS			
SOCIAL			
A-S1	Sustainable economic activity	Taxonomy-aligned turnover: 12.5% Taxonomy-aligned CapEx: 46.4% Taxonomy-aligned OpEx: 6.3% Taxonomy-eligible turnover: 86.7% Taxonomy-eligible CapEx: 89.9% Taxonomy-eligible OpEx: 90.5%	**Annual Financial Report 2024** / Sustainability Statement / *Annex I: EU TAXONOMY TABLES*
A-S2	Employee training expenditure	Total employee training expenditure: €52,147	**Society** / Health, Safety & Employee Development / *Employee Training and Development*
A-S3	Gender pay gap	The gender pay gap for ELLAKTOR S.A. is 7% in favour of male	
A-S4	CEO pay ratio	CEO total annual remuneration: €2,919,113 CEO-to-employee pay ratio: 79.41 Calculation: CEO total annual remuneration (€2,919,113) / Median total annual remuneration of all employees (€36,757) Remuneration Report 2024 *Total remuneration from the company ELLAKTOR S.A. **Average gross earnings of ELLAKTOR S.A. employee	
GOVERNANCE			
A-G1	Strategy, business model and value chain	Description of the strategy, business model and value chain. The ELLAKTOR Group is not involved in the fossil fuels sector, the production of chemicals, controversial weapons, or the cultivation and production of tobacco.	**ELLAKTOR Group** / Value Chain and Business Relationships
A-G2	Business Ethics Violations	Total amount of monetary losses as a result of business ethics violations: €0 Number of business ethics violations: 0	**Governance** / Compliance
A-G3	ESG targets	Short-term Medium-term Long-term	**ELLAKTOR Group** / Group ESG Strategy
A-G4	Variable pay	Variable remuneration rate = 93% (€2,714,600/€2,919,113) Remuneration Report 2024 (p.9)	

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NON-FINANCIAL ESG RATIOS OF THE ATHENS STOCK EXCHANGE

ATHEX Indicator	Description	Additional information	Report Reference
ADVANCED METRICS			
GOVERNANCE			
A-G5	External assurance	Description of the external assurance of the disclosed ESG information, including the scope and level of assurance.	**Annex** / Independent Limited Assurance Report
A-G6	ESG bonds	€0 in ESG bonds	
A-G7	Integration of ESG-related performance in incentive schemes	Incentive schemes and remuneration policies related to sustainability issues	**ELLAKTOR Group** / Sustainable Development in ELLAKTOR Group / *Governance of Sustainable Development*
SECTOR-SPECIFIC METRICS			
ENVIRONMENTAL			
SS-E1	Transition Plan	Transition Plan for Climate Change Mitigation	**Annual Financial Report 2024** / Sustainability Statement / *Environmental Information / B.4.2.2 Climate Change [E1-1] / Transition Plan for Climate Change Mitigation [E1-1]*
SS-E4	Water Management	Water management – Description of water-related risks and the corresponding mitigation measures implemented.	**Environment** / Water Management
SOCIAL			
SS-S6	Health and safety performance	Number of injuries: 16 Number of fatalities: 0 Accident frequency rate: 1.02 Accident frequency rate = (Total number of injuries / Total hours worked) × 200,000. Accident severity rate: 38.1 Accident severity rate = (Total number of lost days / Total hours worked) × 200,000.	**Society** / Health, Safety & Employee Development / *Occupational Health and Safety* **Annex** / Tables / *Occupational Health and Safety Performance*
GOVERNANCE			
SS-G1	Whistleblower policy	Description of the whistleblowing policies and procedures	**Governance** / Compliance

UN Global Compact Index

ELLAKTOR Group has been committed to the Ten Principles of the United Nations Global Compact (UN Global Compact) since 2019 and submits its annual Communication on Progress (CoP) describing its ongoing efforts to implement and uphold these principles.

Description	Alignment with the 10 principles of the UN Global Compact	Reference to Report Sections / GRI Standards
G1 - Board/Highest Governance Body Commitment	1st, 7th	**GRI 2-12, 2-14, 2-22 - Management Message** **ELLAKTOR Group /** Sustainable Development in ELLAKTOR Group
G2 - Code of Conduct on Sustainability	1st, 7th, 10th	**GRI 2-23 - Governance** / Compliance / *Compliance Programme for Integrity*
G2A - Code of Conduct on Sustainability (Additional Information)	1st, 7th, 10th	**GRI 2-9, GRI 2-23 - Governance /** Compliance / *Compliance Programme for Integrity*
G3 - Code of Conduct on Sustainability (Additional Information)	1st, 7th, 10th	**GRI 2-13 - Governance** / Board of Directors & Key Committees / *Sustainable Development Committee*
G3.1 - Formal Governance Structure for Sustainability Oversight	1st, 7th, 10th	**GRI 2-9, 2-13 - Governance** / Board of Directors & Key Committees / *Sustainable Development Committee*
G4 - Risk Assessment Process	1st, 7th, 10th	**GRI 205-1 - Governance** / Risk Management
G4.1 - Risk Assessment Process Related to Suppliers and Other Business Partners	1th, 3rd, 7th, 10th	**Governance** / Value Chain / *Value Chain Risk Management*
G5 - Due Diligence Process for Actual and Potential Negative Sustainability Impacts	1st, 7th, 10th	**GRI 2-12, 2-23-a-ii, 3-1 - ELLAKTOR Group** / Materiality Analysis
G5.1 - Due Diligence Process Related to Suppliers and Other Business Partners	1th, 3rd, 7th, 10th	**GRI 2-23-e, 3-1 - Governance** / Value Chain / *Business Partner Assessment*
G6 - Process for Employees to Raise Concerns About the Company's Sustainability Conduct	1th, 3rd, 7th, 10th	**GRI 2-26 - Governance** / Compliance / *Compliance Programme for Integrity*
G6.1 - Additional Information on Employee Grievance Mechanisms	1th, 3rd, 7th, 10th	**GRI 2-26 - Governance** / Compliance / *Compliance Programme for Integrity*
G7 - Monitoring the Effectiveness of Sustainability Actions and Impacts	1n, 7n, 10n	**GRI 2-25 - Governance** / Compliance / *Compliance Programme for Integrity*
G8 - Executive Remuneration Linked to Sustainability Performance	1st, 7th, 10th	**GRI 2-19 - ELLAKTOR Group** / Sustainable Development in ELLAKTOR Group / *Governance of Sustainable Development*

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Description	Alignment with the 10 principles of the UN Global Compact	Reference to Report Sections / GRI Standards
G9 - Board Composition by Category	1st, 6th	**GRI 2-9, 405-1 - Governance** / Corporate Governance / *Board of Directors & Key Committees*
G9A - Board Composition by Category (Additional Information)	1st, 6th	**GRI 2-9, 405-1 - Governance** / Corporate Governance / *Board of Directors & Key Committees*
G10 - Percentage of Women in Management Positions During the Reporting Period	1st, 6th	**Governance** / Compliance / *Compliance Programme for Integrity*
G10A - Percentage of Women in Management Positions During the Reporting Period (Additional Information)	1st, 6th	**Governance** / Compliance / *Compliance Programme for Integrity*
G11 - Gender Representation in Governance Bodies	1st, 6th	**Governance** / Corporate Governance / *Board of Directors & Key Committees*
G11A - Gender Representation in Governance Bodies (Additional Information**)**	1st, 6th	**Governance** / Corporate Governance / *Board of Directors & Key Committees*
G12 - Reporting Frameworks Used in Preparing the Sustainability Statement	1η, 7η, 10η	**Annex** / Reporting Methodology, Tables / *GRI Content Index, ATHEX ESG Reporting Guide Disclosure Table, UN Global Compact Index, SASB Index*
G12A - Reporting Frameworks Used in Preparing the Sustainability Statement (Additional Information)	1st, 7th, 10th	**Annex** / Reporting Methodology, Tables / *GRI Content Index, ATHEX ESG Reporting Guide Disclosure Table, UN Global Compact Index, SASB Index*
G13 - External Assurance	10th	**GRI 2-5 - Annex** / Independent Limited Assurance Report
G13A - External Assurance (Additional Information)	10th	**GRI 2-5 - Annex** / Independent Limited Assurance Report
HR/L1 - Material Human Rights and Labour Rights Issues Related to the Company's Activities and/or Value Chain	1st, 2nd	**GRI 3-2 - ELLAKTOR Group** / Materiality Analysis / *Results of the Double Materiality Analysis*
HR/L1.1 - Selection of Material Issues Related to the Company's Activities and/or Value Chai	1st, 2nd	**GRI 3-2 - ELLAKTOR Group** / Materiality Analysis / *Results of the Double Materiality Analysis*

Description	Alignment with the 10 principles of the UN Global Compact	Reference to Report Sections / GRI Standards
HR/L2 - Policy Commitment on Human and Labour Rights	1st, 2nd, 3rd, 4th, 5th, 6th	**GRI 2-23-a-iv, 2-23-b, 3-3-c, / GRI 3-3-c, 403 -** **Society /** Health, Safety & Employee Development / *Safeguarding Human Rights, Workforce, Diversity, Equity and Inclusion, Occupational Health and Safety* **Governance** / Compliance / *Compliance Programme for Integrity*
HR/L2. A - Policy commitment on human and labour rights (Additional information)	1st, 2nd, 3rd, 4th, 5th, 6th	**GRI 2-23-c, 2-23-d, 2-23-e, / GRI 2-23-c, 2-23-d, 2-23-e -** **Society /** Health, Safety & Employee Development / *Safeguarding Human Rights, Workforce, Diversity, Equity and Inclusion, Occupational Health and Safety* **Governance** / Compliance / *Compliance Programme for Integrity*
HR/L2.1 - Characteristics of policy commitments on human and labour rights	1st, 2nd, 3rd, 4th, 5th, 6th	**GRI 2-23-c, 2-23-d, 2-23-e, / GRI 2-23-c, 2-23-d, 2-23-e -** **Society /** Health, Safety & Employee Development / *Safeguarding Human Rights, Workforce, Diversity, Equity and Inclusion, Occupational Health and Safety* **Governance** / Compliance / *Compliance Programme for Integrity*
HR/L2.2 - Company's Policy on Freedom of Association and Collective Bargaining	3rd	**GRI 2-30 - Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*
HR/L2.3 - Provision of More Favourable Terms through Collective Bargaining Agreements than those Required by Legislation	3rd	**N/A**

Description	Alignment with the 10 principles of the UN Global Compact	Reference to Report Sections / GRI Standards
HR/L3 - Stakeholder Engagement on Human and Labour Rights	1st, 2nd, 3rd, 4th, 5th, 6th	**GRI 3-1-b, 3-3-f, / GRI 3-1-b, 3-3-f, 403 - ELLAKTOR Group** / Communication with Stakeholders
HR/L4 - Measures to Mitigate Risks Related to Human and Labour Rights	1st, 2nd, 3rd, 4th, 5th, 6th	**GRI 2-23, 3-3-d, , 225 / GRI 3-3-d, 403 -** **Society /** Health, Safety & Employee Development/ *Safeguarding Human Rights, Occupational Health and Safety* **Governance** / Value Chain / *Value Chain Risk Management*
HR/L4.1 - Assessment of Progress in Preventing and Addressing Human and Labour Rights Issues	1st, 2nd, 3rd, 4th, 5th, 6th	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*
HR/L4.1.1 - Time-bound Targets on Human and Labour Rights	1st, 2nd, 3rd, 4th, 5th, 6th	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*
HR/L5 - Contribution to the Remediation of Human and Labour Rights Impacts	1st, 2nd	**GRI 3-3-d-ii - Society** / Health, Safety & Employee Development / *Diversity, Equity & Inclusion*
H HR/L6 - Average Gender Pay Gap (for Equivalent Positions)	6th	**GRI 405-2 - Society** / Health, Safety & Employee Development / *Diversity, Equity & Inclusion* **Παράρτημα** / Πίνακες */ Πίνακας GRI standards*
HR/L6A - Average Gender Pay Gap (for Equivalent Positions) (Additional Information)	6th	**GRI 405-2 - Society** / Health, Safety & Employee Development / Diversity, Equity & Inclusion **Annex /** Tables / *GRI Content Index*
HR/L7 - Injury Frequency Rate	3rd, 4th, 5th, 6th	**GRI 403-9 - Society** / Health, Safety & Employee Development / *Occupational Health and Safety* **Annex** / Tables / *Occupational Health and Safety Performance*
E1 - Policy Commitment on Environmental Matters	7η, 8η	**GRI 3-3-c, 302, 303, 304, 305, 306 - Environment /** Environmental Management
E1A - Policy Commitment on Environmental Matters (Additional Information)	7th, 8th	**GRI 3-3-c, 302, 303, 304, 305, 306 - Environment /** Environmental Management
E1.1 - Characteristics of Environmental Policy Commitments	7th, 8th	**GRI 2-23-c, 2-23-d, 2-23-e - Environment /** Environmental Management

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Description	Alignment with the 10 principles of the UN Global Compact	Reference to Report Sections / GRI Standards
E2 - Stakeholder Engagement on Environmental Matters	7th, 8th	**GRI 3-1-b, 3-3-f, 201-2-a-iv, 302, 303, 304, 305, 306 -** **Environment** / Climate Change, Environmental Management / *Environmental and Energy Management System, Biodiversity & Ecosystem Protection*
E3 - Actions to Mitigate Risks Related to Environmental Matters	7th, 8th	**GRI 3-1-b, 3-3-f, 201-2-a-iv, 302, 303, 304, 305, 306 -** **Environment /** Environmental Management
E3.1 - Monitoring Progress in Mitigating Risks Related to Environmental Matters	7th, 8th	**GRI 201-2-a-iv, 302, 303, 304, 305, 306 -** **ELLAKTOR Group** / Group ESG Strategy / *Climate Change & Circular Economy*
E3.1.1 - Targets Set for Each Environmental Matter	7th, 8th	**GRI 3-3-e, 201-2-a-iv, 302, 303, 304, 305, 306 -** **ELLAKTOR Group** / Group ESG Strategy
E3.1.2 - Monitoring Progress Against Environmental Targets	7th, 8th	**GRI 3-3-e, 201-2-a-iv, 302, 303, 304, 305, 306 -** **ELLAKTOR Group** / Group ESG Strategy
E4 - Contribution to the Remediation of Environmental Impacts	7th, 8th	**GRI 3-3-d-ii, 201-2-a-iv, 302, 303, 304, 305, 306 -** **ELLAKTOR Group** / Group ESG Strategy **Environment /** Environmental Management, Climate Change, Circular Economy, Water Management, Biodiversity & Ecosystem Protection
E5 - Greenhouse Gas Emissions Reduction Targets Validated by an Independent Third Party	7th, 8th	**ELLAKTOR Group** / Group ESG Strategy / *Climate Change* **Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
E5.1 - Greenhouse Gas (GHG) Emissions (Scope 1 and Scope 2)	7th, 8th	**GRI 305-1, 305-2 - Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
E6 - Scope 3 Greenhouse Gas (GHG) Emissions	7th, 8th	**GRI 305-3 - Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
E6.1 - Scope 3 Categories Included in the Greenhouse Gas Emissions Inventory	7th, 8th	**GRI 305-3 - Environment** / Climate Change / *Greenhouse Gas Emissions (GHG)*
E7 - Climate Change Adaptation Actions	7th, 8th, 9th	**GRI 201-2-a-iv - Environment** / Climate Change / *Climate Risks and Potential Financial Impacts Identification and Assessment (TCFD)*
E8 - Actions to Reduce Fossil Fuel Consumption	7th, 8th, 9th	**Environment /** Climate Change / *Energy Consumption*

Description	Alignment with the 10 principles of the UN Global Compact	Reference to Report Sections / GRI Standards
E8A - Actions to Reduce Fossil Fuel Consumption (Additional Information)	7th, 8th, 9th	**Environment /** Climate Change / *Energy Consumption*
E9 - Increased Direct and Indirect Investments in Low-Carbon Technologies	7th, 8th, 9th	**Environment /** Climate Change / *Energy Consumption*
E10 - Environmental Matters Identified as Material and Linked to the Organization's Operations and/or Value Chain	7th, 8th, 9th	**GRI 3-2 - ELLAKTOR Group** / Materiality Analysis
AC1 - Anti-Corruption Compliance Programme	10th	**GRI 3-3-c, 205 - Governance** / Compliance / *Compliance Programme for Integrity*
AC1.2 - Monitoring of the Anti-Corruption Compliance Programme	10th	**GRI 3-3-e - Governance** / Compliance / *Compliance Programme for Integrity*
AC2 - Policies on Conflicts of Interest	10th	**Governance** / Compliance / *Compliance Programme for Integrity*
AC3 - Collective Action Against Corruption	10th	**GRI 3-3-c, 3-3-d, 205 - Governance** / Compliance / *Compliance Programme for Integrity*
AC3A - Collective Action Against Corruption (Additional Information)	10th	**GRI 3-3-c, 3-3-d, 205 - Governance** / Compliance / *Compliance Programme for Integrity*
AC4 - Anti-Corruption and Integrity Training	10th	**GRI 205-2 - Governance** / Compliance / *Compliance Programme for Integrity* **Society** / Health, Safety & Employee Development / *Employee Training and Development*
AC4.1 - Training Frequency	10th	On an annual basis
AC5 - Total Number and Nature of Corruption Incidents	10th	**GRI 205-3 - Governance** / Our Performance, Compliance / *Compliance Programme for Integrity*

SASB Index

The table below presents the alignment of the contents of this Report with the metrics of the Sustainability Accounting Standards Board (SASB).

Metrics applicable to waste management operations, identified by the letters “WM” in their code, include data relating to HELECTOR S.A. and its subsidiaries, representing the Group’s Environment segment.

SASB Code	Description	Additional Information
ENVIRONMENT		
GREENHOUSE GAS EMISSIONS		
IF-WM 110a.1	(1) Gross global Scope 1 greenhouse gas (GHG) emissions, (2) percentage covered under emissions-limiting regulations, and (3) percentage covered under emissions-reporting regulations	(1) 13,013metric t CO_2 eq.
IF-WM-110a.2	(1) Total landfill gas generated, (2) percentage flared, and (3) percentage used for energy generation	(1) 1,825,927MMBtu (2) 0.01% (3) 99.99%
FLEET FUEL MANAGEMENT		
IF-WM-110b.1	(1) Vehicle fuel consumed, (2) percentage natural gas, and (3) percentage renewable energy	(1) 25,056 MWh (2) 32 % (3) 93 %
AIR QUALITY		
IF-WM-120a.1	Air emissions of the following pollutants: (1) NOx (excluding N_2O), (2) SOx, (3) volatile organic compounds (VOCs), and (4) hazardous air pollutants (HAPs)	(1) 35.21 (2) 0.28 (3) 2.52
IF-WM-120a.2	Number of facilities located in or near densely populated areas	None, based on the official data of ELSTAT for the population census (2021)

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SASB Code	Description	Additional Information
HUMAN CAPITAL		
EMPLOYEE HEALTH AND SAFETY		
IF-WM-320a.1	(1) Total Recordable Incident Rate (TRIR), (2) fatality rate, and (3) near miss frequency rate for (a) direct employees and (b) contract employees	(1α) 0.71 , (1β) 0 (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 by collective bargaining agreements	88%
IF-WM-310a.2	(1) Number of work stoppages and (2) total days idle	No work stoppages were recorded.
BUSINESS MODEL AND INNOVATION		
RESOURCE RECOVERY AND RECYCLING		
IF-WM-420a.1	(1) Amount of waste incinerated, (2) percentage of hazardous waste incinerated, and (3) percentage of waste used for energy recovery	(1) 4,593 tons (2) 100% (3) 0
IF-WM-420a.3	Amount of material (1) recycled, (2) composted, and (3) used for energy generation	(7) 831,888 tons (8) 5.407 τόνοι (9) 0
IF-WM-420a.4	Amount of electronic waste collected and percentage recovered through recycling	160 tonnes of waste electrical and electronic equipment (WEEE) were sent for recycling by the Group's Waste Treatment Facilities (100%). The Group's operations do not include the separate collection of waste electrical and electronic equipment.

AA1000 Accountability Principles (2018)

Principle	Approach	Reference to Report Sections
Inclusivity	Identification of key stakeholders and engagement to understand their key interests and concerns	**ELLAKTOR Group** / Communication with Stakeholders
Materiality	Identification and prioritization of the topics that are most significant to the organization and its stakeholders	**ELLAKTOR Group** / Materiality Analysis
Responsiveness	Responding to material topics and ensuring transparency regarding the organization's performance	**ELLAKTOR Group** / Group ESG Strategy **Environment /** Environmental Management, Climate Change, Circular Economy and Waste Management, Water Management, Air and Soil Quality, Biodiversity & Ecosystem Protection **Society** / Health, Safety & Employee Development / *Action Plan, Employee Remuneration and Benefits , Work-Life Balance and Employee Well-being, Recruitment and Talent Attraction, Employee Training and Development, Safeguarding Human Rights, Diversity, Equity & Inclusion, Occupational Health and Safety, Social Responsibility* **Governance** / Compliance, Value Chain **Annex** / Tables
Impact	Reporting the direct and indirect impacts of the organization's activities	**ELLAKTOR Group** / Materiality Analysis, Group ESG Strategy **Environment** / Environmental Management, Climate Change, Circular Economy **Society** / Health, Safety & Employee Development / *Action Plan, Employee Attraction & Retention, Employee Training & Development, Safeguarding Human Rights, Diversity, Equity & Inclusion, Occupational Health and Safety, Social Responsibility / Contributing to Sustainable Cities and Communities, Engagement with local communities* **Governance /** Compliance, Value Chain **Annex** / Tables

Greek Sustainability Code – Declaration of Compliance

ELLAKTOR Group complies with all 20 criteria of the Greek Sustainability Code, as presented below.

Topic	Reference to the Report
STRATEGY	
1. Strategic Analysis and Action	**ELLAKTOR Group** / Sustainable Development in ELLAKTOR Group, Group ESG Strategy
2. Materiality	**ELLAKTOR Group** / Materiality Analysis
3. Objectives	**ELLAKTOR Group** / Group ESG Strategy
4. Value Chain Management	**Governance** / Value Chain
PROCESS MANAGEMENT	
5. Responsibility	**ELLAKTOR Group** / Materiality Analysis, Sustainable Development in ELLAKTOR Group **Governance** / Board of Directors & Key Committees / *Sustainable Development Committee*
6. Rules & Processes	**ELLAKTOR Group** / Awards and Certifications **Environment** / Environmental Management **Society** / Health, Safety & Employee Development / *Action Plan, Occupational Health & Safety / Occupational Health and Safety Policy , Occupational Health and Safety Management System, Occupational Health and Safety Governance Structure, Communication and Consultation, Occupational Health and Safety Management Plans and Written Occupational Risk Assessment, Occupational Health and Safety Training, Internal Audits, Incident Management, Occupational Health & Safety Performance Evaluation, Actions Occupational Health and Safety* **Governance** / Compliance
7. Monitoring	**ELLAKTOR Group** / Group ESG Strategy **Environment** / Our Performance, Environmental Management, Climate Change, Circular Economy, Water Management, Air and Soil Quality, Biodiversity & Ecosystem Protection **Society /** Our Performance, Health, Safety & Employee Development / *Workforce, Employment, Employee Training and Development, Diversity, Equity & Inclusion, Occupational Health and Safety / Occupational Health and Safety Training, Occupational Health and Safety Performance Indicators, Social Responsibility / Contributing to Sustainable Cities and Communities, Employee Volunteering* **Governance /** Our Performance, Action Plan, Corporate Governance / Board of Directors & Key Committees, Value Chain, Innovation & Digital Transformation **Annex /** Tables

Topic	Reference to the Report
PROCESS MANAGEMENT	
8. Incentive and reward systems for Sustainable Development	**ELLAKTOR Group** / Group ESG Strategy, Sustainable Development in ELLAKTOR Group / *Governance of Sustainable Development* **Environment** / Environmental Management, Circular Economy, Water Management, Air and Soil Quality, Biodiversity & Ecosystem Protection **Society** / Our Performance, Health, Safety & Employee Development / *Workforce, Employment, Employee Training and Development, Diversity, Equity & Inclusion, Occupational Health and Safety / Occupational Health and Safety Training, Occupational Health and Safety Performance Indicators, Social Responsibility / Contributing to Sustainable Cities and Communities, Employee Volunteering* **Governance** / Our Performance, Action Plan, Corporate Governance / *Board of Directors & Key Committees, Value Chain*
9. Stakeholder Engagement	**ELLAKTOR Group** / Business Model / *Communication with Stakeholders*
10. Product Responsibility and Innovation	**Governance** / Innovation & Digital Transformation
ENVIRONMENT	
11. Usage of Natural Resources	**Environment** / Climate Change / *Energy Consumption, Circular Economy, Water Management, Air and Soil Quality, Biodiversity & Ecosystem Protection*
12. Resource Management	**Environment** / Action Plan, Environmental Management / *Environmental and Energy Management System, Circular Economy / Management of Natural Resources and Raw Materials*
13. Climate-relevant emissions	**Environment** / Action Plan, Climate Change
SOCIETY	
14. Employment Rights	**ELLAKTOR Group** / Business Model / *Communication with Stakeholders* **Society** / Action Plan
15. Equal Opportunities	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights, Diversity, Equity & Inclusion*
16. Qualifications	**Society** / Action Plan, Safeguarding Human Rights / *Workforce/ Employment, Employee Attraction and Retention*
17. Human Rights in the Supply Chain	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights* **Governance** / Value Chain
18. Corporate Citizenship	**Society** / Social Responsibility
19. Initiatives and Political Influence	**ELLAKTOR Group** / Group ESG Strategy / *Participation in Associations and Organisations* **Annex** / Table GRI / *GRI 415-1*
20. Corruption prevention and alleviation	**ELLAKTOR Group** / Group ESG Strategy **Governance** / Compliance **Annex** / Tables / *Certified Management Systems*

ISO 26000:2010

ISO 26000:2010 Article	Description	Comment / Reference to the Report
4. PRINCIPLES OF SOCIAL RESPONSIBILITY		
4.2	Accountability	The Group publishes an annual Sustainability Report presenting its ESG and sustainability performance, as well as the Group's strategy and related future objectives. **ELLAKTOR Group** / Group ESG Strategy **Environment** / Environment & Energy Management, Action Plan **Society** / Action Plan for Health, Safety & Employee Development **Governance** / Action Plan **Annex** / Report Methodology
4.3	Transparency	
4.4	Ethical behavior	**Governance** / Corporate Governance Code, Board of Directors & Key Committees, Compliance **Annex** / Certified Management Systems
4.5	Respect for Stakeholder Interests	**ELLAKTOR Group** / Communication with Stakeholders
4.6	Respect for the rule of law	**ELLAKTOR Group** / Communication with Stakeholders
4.7	Respect for international norms of bahaviour	**ELLAKTOR Group** / Contribution of ELLAKTOR Group to the Sustainable Development Goals **Society** / Safeguarding Human Rights **Governance** / Compliance
4.8	Respect for human rights	**Society** / Health, Safety & Employee Development / *Safeguarding Human Rights*

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Participation in Associations and Organisations

Hellenic Federation of Enterprises (SEV)

The Hellenic Federation of Enterprises (SEV) represents Greek enterprises and industries and safeguards their interests both at national and European level through its corresponding European representative body, BusinessEurope.

SEV Council for Sustainable Development

The SEV Council for Sustainable Development was established to serve as a strong and dynamic platform for companies seeking to play a leading role in advancing sustainable development within the Greek business community. Companies participating in the Council commit to actively contributing to its work and to endorsing and implementing a common Code of Principles for Sustainable Development through continuous improvement and adaptation.

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

Hellenic Network for Corporate Social Responsibility – CSR Hellas

CSR Hellas is a non-profit business network established to promote the concept of Corporate Social Responsibility (CSR) and raise awareness of its importance within the business and wider social environment. ELLAKTOR Group is a member of CSR Hellas.

United Nations Global Compact

The United Nations Global Compact (UN Global Compact) promotes the adoption of ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. ATTIKI ODOS S.A. has been a signatory to the UN Global Compact since 2008. In 2019, ELLAKTOR Group committed to integrating the Ten Principles of the UN Global Compact into its business operations and its relationships with stakeholders. As a subsidiary of the ELLAKTOR Group, ATTIKI ODOS S.A. is represented by the Group within the international initiative and is also a member of Global Compact Network Greece.

Global Compact Network Hellas

Global Compact Network Greece promotes the United Nations Global Compact initiative in Greece. It is an independent, self-governed entity that works closely with the UN Global Compact Office in New York and serves as the official country contact point for its participants. The ELLAKTOR Group is one of the founding members of Global Compact Network Greece. Since 2019, ATTIKI ODOS S.A. has also been a member.

Greek Infrastructure and Toll Roads – HELLASTRON

ATTIKI ODOS S.A., ATTIKES DIADROMES S.A. and MOREAS S.A. are members of HELLASTRON – Hellenic Infrastructure and Toll Road Network, an association comprising all modern toll motorway operators and infrastructure companies operating in Greece. Its mission is to promote professional, scientific, research, social and educational initiatives related to road transport in Greece. HELLASTRON is a member of ASECAP (European Association of Operators of Toll Road Infrastructures), which brings together the national associations of toll motorway operators across Europe. Its objective is to promote and develop motorway and road infrastructure throughout Europe, supporting user charging (tolls) as a means of financing the construction, operation and maintenance of road infrastructure. HELLASTRON is also a member of the International Bridge, Tunnel and Turnpike Association (IBTTA), the international association representing toll road and concession operators worldwide. In addition, HELLASTRON is a member of the International Road Federation (IRF), headquartered in Geneva, whose mission is to promote the development of safe and sustainable 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 established to promote the benefits of adopting the circular economy production model through initiatives related to recycling and energy recovery from waste, thereby contributing to the sustainable development of the country.

Greek Association of Environmental Protection Companies (PASEPPE)

HELECTOR participates in the Greek Association of Environmental Protection Companies (PASEPPE), whose purpose is to foster cooperation among companies active across the full spectrum of environmental protection and waste management. Through collaboration among its members, the Association promotes issues relating to the regulatory framework governing waste management, environmental protection and the implementation of national legislation.

American-Hellenic Chamber of Commerce

The American-Hellenic Chamber of Commerce is an independent, non-profit organization established in 1932 to promote economic and business relations between Greece and the United States. With approximately 1,000 members, the Chamber continues to promote and facilitate trade, investment and business cooperation between the two countries. It is an accredited member of the U.S. Chamber of Commerce in Washington, D.C., and a member of the European Council of American Chambers of Commerce, making it one of the most active business organizations in Europe. ELLAKTOR Group is a member of the American-Hellenic Chamber of Commerce.

In addition, HELECTOR participates in the Hellenic Association of Renewable Energy Electricity Producers (ESIAPE), the Hellenic Biogas Producers Association (ESPAV) through its Mavrorachi facility, the Hellenic Solid Waste Management Association (HSWMA), the European Geothermal Energy Council (EGEC), the American-Hellenic Chamber of Commerce (AmCham) and the German-Hellenic Chamber of Industry and Commerce.

More specifically, APOSTEIROSI S.A. and APOTEFROTIRAS S.A., subsidiaries of HELECTOR, are members of the Association of Healthcare Waste Management Companies (SEDYA), which represents organizations involved in the management of healthcare waste and supports the implementation of the relevant legislative framework.

Furthermore, ATTIKI ODOS S.A. and ATTIKES DIADROMES S.A. participate in the Association of Societes Anonymes and Limited Liability Companies (SAE), the Athens Chamber of Commerce and Industry (ACCI), the International Bridge, Tunnel and Turnpike Association (IBTTA) and the International Road Federation (IRF). 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 major international organizations, including the Transportation Research Board (TRB) of the National Academies (USA) and ERTICO – ITS Europe, while also cooperating with Greek organizations such as the Panos Mylonas Institute of Road Safety, the Hellenic Institute of Transportation Engineers (SES), the Research Academic Computer Technology Institute (EPISEY), ITS Hellas, and others.

The company is also a member of the Hellenic Institute of Customer Service (ELIPE), where the Director of Tolling, Commercial Management and Call Centre Operations of ATTIKES DIADROMES S.A. serves as Chairman.

Tables

Table of Non-Hazardous Waste from the Group's operation

2024	Management Methods			
Type of waste	**Total Quantity (kg)**	**Recovery (R) *(kg)**	**Disposal (D)**(kg)**	**Temporary on-site storage (kg)**
Paper, Mixed Paper, Cardboard	**40,250**	40,250		
Scrap Metal	**117,160**	117,160		
Glass	**190**	190		
Plastics and plastic packaging	**10,030**	10,030		
Tyres	**2,970**	2,970		
Cables	**903**	903		
Waste Electrical and Electronic Equipment (WEEE)	**7,062**	7,062		
Demolitions	**278,280**	278,280		
Excavations	**85,067,860**	85,067,860		
Mixed packaging	**70,910**	70,910		
Wooden Packing	**5,980**	5,980		
Mixed non-hazardous waste	**76,419**	73,763	2,656	
Municipal waste	**134,480**	6,295	128,185	
Green waste	**75,250**	250	75,000	
End-of-Life Vehicles (ELVs)	**410**		410	
Other non-hazardous waste***	**16,955**	15,280	1,675	
Total	**85,905,109**	**85,697,183**	**207,926**	

** **Recycling (off-site)**: 85,685,934kg, Reuse (off-site): 250kg, Other recovery method: 10,999kg*

*** **Incineration:** 1,675kg, Landfill: 130,841kg, Other disposal method: 75,410kg*

******Indicatively:** animal by-products, bulky waste, street cleaning waste*

Table of Hazardous Waste from the Group's operation

2024	Management Methods			
Type of waste	**Total Quantity (kg)**	**Recovery (R) (kg) ***	**Disposal (D)(kg)****	**Temporary on-site storage (kg)**
Waste lubricating oils	**59,402**	59,402		
Lead (Pb-acid) accumulators	**7,323**	7,323		
Waste Electrical and Electronic Equipment (WEEE)	**17,402**	17,402		
Fluorescent tubes	**194**	194		
Batteries	**43**	43		
Contaminated packaging	**34**	34		
Toner	**104**	104		
Contaminated Absorbent Materials	**1,394**	1,394		
Oil filters	**2,850**	2,850		
Fly ash	**448,180**	437,150		11,030
Bottom Ash	**749,370**	739,130		10,240
Bag Filters	**210**		210	
Other hazardous waste***	**12,800**	12,800		
Total	**1,299,306**	**1,277,826**	**210**	**21,270**

****Recycling (off-site):** 91,596kg, Reuse (off-site): 739,680kg, Other recovery method: 446,550kg,*
*** **Incineration:** 210kg,*
**** antifreeze liquids, refractory bricks*

Table of Non-Hazardous Waste Managed by the Group's Companies and Subcontractors

2024	Management methods			
Type of waste	**Total Quantity (kg)**	**Recovery (R) (kg)***	**Disposal (D)(kg)****	**Temporary on-site storage (kg)**
Paper, Mixed Paper, Cardboard	**35,470**	35,470		
Scrap Metal	**18,890**	18,890		
Plastics and plastic packaging, pallet tanks	**460**	460		
Waste Electrical and Electronic Equipment (WEEE)	**274**	274		
Demolitions	**653,580**	653,580		
Excavations	**80,082,195**	80,082,195		
Wooden Packing	**4,050**	4,050		
Mixed non-hazardous waste	**283,910**	280,082	3,828	
Mixed packaging	**4,245**	4,245		
Municipal waste	**14,721**		14,721	
Other non-hazardous waste***	**3,289**	3,289		
Total	**81,101,084**	**81,092,535**	**8,549**	

** **ecycling (on-site):** 3,500kg **Recycling (off-site):** 570,454 kg, **Reuse (on-site):** 80,082,195kg, **Reuse (off-site):** 328,250kg, **Other recovery method:** 98,136kg*

*** **Landfill:** 18.549kg*

**** **Indicatively:** used cooking oils*

Table of Hazardous Waste Managed by Group Companies and Subcontractors

2024	Management Methods			
Type of waste	**Total Quantity (kg)**	**Recovery (R) (kg) ***	**Disposal (D) (kg)**	**Temporary on-site storage (kg)**
Waste lubricating oils	**53,189**	50,654	2,175	360
Fluorescent tubes	**208**	208		
Batteries	**43**	43		
Contaminated packaging	**1,131**	1,120		11
Contaminated absorbent materials	**2,851**	2,847		4
Oil filters	**850**	610	240	
Discarded Inorganic Chemical Materials	**40**			40
Laboratory chemicals	**174**		91	83
Medical waste	**3,615**		3,615	
Lead (Pb-acid) accumulators	**357**	357		
Other hazardous waste**	**26,229**	26,217	12	
Total	**88,687**	**82,056**	**6,133**	**498**

****Recycling (off-site):** 25,892 kg, **Reuse (off-site):** 24,163kg, **Other recovery method:** 32,001kg*

***** Other disposal method:** 4,294kg, **Incineration:** 1,839kg*

***Waste containing oil, gases in pressure vessels*

Water Withdrawal by Source

Water Withdrawal Source	Quantity of fresh water with quality ≤1,000 mg/L TDS (m³)	Quantity of water with quality >1,000 mg/L TDS (m³)
Groundwater	818,880	28,764
Third Party (Public or Private Water Supply Networks)	192,902	
Wastewater from on-site sources	28,665	34,688
Rainwater	1,132	
Other sources (Water Treatment Plants, Desalination Plants)	29,047	
Total	**1,070,626**	**63,452**

Water Discharge by Destination

Water Discharge Destination	Fresh water discharge quantity with quality ≤1,000 mg/L TDS (m³)	Water discharge quantity with quality >1,000 mg/L TDS (m³)
Surface water	0	0
Groundwater	29	0
Sea	0	0
Third-party water recipients (e.g. public or private entities)	14,087	32,907
Total	**14,116**	**32,907**

Occupational Health and Safety Performance

WORK-RELATED INJURIES (GRI 403-9)

Occupational Health and Safety Performance Indicators	2022			2023			2024		
	Men	Women	**Total**	Men	Women	**Total**	Men	Women	**Total**
HUMAN CAPITAL									
Number of fatalities as a result of work-related injuries	0	0	**0**	0	0	**0**	0	0	**0**
Fatality rate	0	0	**0**	0	0	**0**	0	0	**0**
Number of high-consequence work-related injuries (excluding fatalities)	0	0	**0**	0	0	**0**	0	1	**1**
High-consequence injury rate*	0	0	**0**	0	0	**0**	0	0.26	**0.06**
Number of recordable work-related injuries	14	7	**21**	18	4	**22**	8	8	**16**
Recordable injury rate**	3.92	2.24	**3.53**	6.16	2.55	**4.90**	3.37	10.26	**5.08**
Days lost due to work-related injuries (calendar days)	372	94	**466**	449	26	**475**	172	428	**600**
Total hours worked	4,189,242	2,785,972	**6,975,214**	2,919,728	1,570,937	**4,490,665**	2,370,888	779,364	**3,150,253**

Note:
** The high-consequence injury rate represents the number of high-consequence work-related injuries per 200,000 hours worked.*
*** The recordable injury rate represents the number of recordable work-related injuries per 1,000,000 hours worked.*
For the purposes of this Report, a work-related injury is defined as any work-related incident resulting in an employee injury and leading to lost workdays (excluding the day on which the incident occurred). The figures exclude fatalities, incidents resulting from medical conditions or natural causes, incidents with zero lost workdays, and commuting accidents occurring while travelling to or from work. No corresponding table is presented for non-employees, as no work-related injuries were recorded during the reporting period.ός.

Certified Management Systems

Certified Management Systems	Group / Companies
ISO 9001:2015	AKTOR CONCESSIONS S.A., ATTIKES DIADROMES S.A., MOREAS S.A., HELECTOR S.A., APOSTEIROSI S.A., APOTEFROTIRAS S.A., ASA RECYCLE (Aspropyrgos), ASA RECYCLE (Lamia), EDADYM S.A., EPALTHEA S.A., DEVELOPMENT OF THE NEW ALIMOS MARINA S.A.
ISO 45001:2018	AKTOR CONCESSIONS S.A., ATTIKES DIADROMES S.A., ATTIKI ODOS S.A., HELECTOR S.A., APOSTEIROSI S.A., APOTEFROTIRAS S.A., ASA RECYCLE (Aspropyrgos), ASA RECYCLE (Lamia), EDADYM S.A., EPALTHEA S.A., DEVELOPMENT OF THE NEW ALIMOS MARINA S.A.
ISO 14001:2015	AKTOR CONCESSIONS S.A., ATTIKES DIADROMES S.A., ATTIKI ODOS S.A., MOREAS S.A., HELECTOR S.A., APOSTEIROSI S.A., APOTEFROTIRAS S.A., ASA RECYCLE (Aspropyrgos), ASA RECYCLE (Lamia), EDADYM S.A., EPALTHEA S.A., VEAL S.A., DEVELOPMENT OF THE NEW ALIMOS MARINA S.A.
ISO 50001:2018	ATTIKES DIADROMES S.A., ATTIKI ODOS S.A., MOREAS S.A., HELECTOR S.A., APOSTEIROSI S.A., APOTEFROTIRAS S.A., ASA RECYCLE (Aspropyrgos), EDADYM S.A., EPALTHEA S.A., VEAL S.A., DEVELOPMENT OF THE NEW ALIMOS MARINA S.A.
ISO 39001:2012	ATTIKES DIADROMES S.A., HELECTOR S.A., ASA RECYCLE (Aspropyrgos)
ISO 37000:2021	ELLAKTOR S.A., APOTEFROTIRAS S.A.
ISO 37001:2016	ELLAKTOR S.A., AKTOR CONCESSIONS S.A., HELECTOR S.A., APOSTEIROSI S.A., EPALTHEA S.A., REDS REAL ESTATE DEVELOPMENT S.A.
ISO 37301:2021	ELLAKTOR Group
ISO 37002:2021	ELLAKTOR Group
ISO 41001:2018	HELECTOR S.A.
ISO 27001:2013*	ELLAKTOR S.A., AKTOR CONCESSIONS S.A., HELECTOR S.A., REDS REAL ESTATE DEVELOPMENT S.A.
ISO 22301:2019	ELLAKTOR S.A., AKTOR CONCESSIONS S.A., HELECTOR S.A., ASA RECYCLE (Aspropyrgos)
ISO/IEC 20000-1:2018	HELECTOR S.A.
ISO 26000:2010	HELECTOR S.A.
SA 8000:2018	HELECTOR S.A.
EMAS 1221:2009	HELECTOR S.A.
ISO 19650-2:2018	HELECTOR S.A.

APOSTEIROSI S.A., a subsidiary of HELECTOR S.A., is certified in accordance with ELOT EN 12740:2000, with the scope of certification covering the Sterilization of Infectious Healthcare Waste (IHW).

The ELLAKTOR Group's headquarters are located in a building certified in accordance with ELOT 1439:2013, «Organization Friendly to Persons with Disabilities», covering accessible parking spaces, an accessible entrance, accessible horizontal and vertical circulation routes, accessible facilities, accessible fixed equipment, accessible emergency egress, and staff education and training.

** Valid until November 2024.*

Independent Limited Assurance Report

Introduction

The Board of Directors of "ELLAKTOR S.A." (hereinafter "the Company") engaged "GRANT THORNTON S.A. CHARTERED ACCOUNTANTS AND MANAGEMENT CONSULTANTS" (hereinafter "Grant Thornton") to review the non-financial data included in Group's 2024 Sustainability Report (hereinafter the "Report") for the fiscal year ended on December 31st, 2024 (hereinafter "the selected data"), with the objective of providing limited assurance in relation to the criteria described below under "Scope of Work".

Scope of Work

The assurance engagement was designed and performed in accordance with the provisions of International Standard on Assurance Engagements 3000, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000, Revised), in order to provide limited assurance conclusions regarding the following:

- The accuracy and completeness of the quantitative data and the plausibility of the qualitative information relating to:
  - The criteria set out in the "GRI 1: Foundation 2021 Standard" for reporting "in accordance".
  - The General Disclosures of the "GRI 2: General Disclosures 2021 Standard".
  - The Topic-Specific Disclosures of the "GRI Topic Standards" and the Company-specific indicators for the Material Topics, in accordance with the results of the materiality analysis performed.
  - The sector-specific disclosures of the Sustainability Accounting Standards Board (SASB) – Waste Management Standard.
  - The indicators of the Athens Stock Exchange ESG Reporting Guide 2024 (ESG Athex Index).
  - Compliance with the AccountAbility Principles of Inclusivity, Materiality, Responsiveness and Impact against the relevant criteria of AA1000AP.
  - Compliance with the 10 Principles of the UN Global Compact.

Except for the matters described in the preceding paragraph, which defines the scope of the Engagement, we did not perform assurance procedures on the remaining information included in the Report and, accordingly, we do not express a conclusion on such information.

Management Responsibility

ELLAKTOR S.A. is responsible for the preparation, completeness, accuracy and presentation of the selected data provided to us, as incorporated in the Report. This responsibility also includes the selection and application of appropriate methods for preparing the Report, as well as the use of reasonable assumptions and estimates, given the circumstances, for the individual sustainability information. In addition, Management is responsible for maintaining records and adequate safeguards designed to support the reporting process. Specifically, Management is responsible for the design and implementation of internal controls to prevent material misstatements in the Report.

Grant Thornton Responsibility

Our responsibility is to carry out a limited assurance engagement and to express our conclusions based on the procedures carried out for the selected data, as described in the "Introduction" and "Scope of Work" sections. The procedures we carried out were designed to provide limited assurance, as defined by ISAE 3000, "Assurance Engagements Other than Audits or Reviews of Historical Financial Information", issued by the International Auditing and Assurance Standards Board. This standard requires us to comply with the ethical requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants (IESBA) and to plan and perform the independent limited assurance engagement in a manner that enables us to express a limited assurance conclusion.

The limited assurance engagement primarily involves inquiries and analytical procedures. These procedures vary in nature and timing and are less extensive than those performed as part of a reasonable assurance engagement. To the extent it is permitted by the legislation in force, we neither accept nor assume any responsibility for our engagement or this report towards anyone other than the Company and the ELLAKTOR Group, unless the terms have been agreed explicitly in writing with our prior consent.

Our audit firm applies International Standard on Quality Management (ISQM) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements, and therefore maintains an integrated audit quality management system that includes documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Audit Work conducted

We designed and performed our audit work in order to collect all data, relevant documentation, information and explanations we considered necessary as to the selected data described in the "Scope of Work" section. The procedures followed with regard to the selected data included:

- Conducting interviews with personnel of the Company responsible for managing, collecting and processing data in order to obtain an understanding of key structures, systems, policies and relevant procedures applied.
- Performing verification audit procedures, on a sample basis, in order to collect and review audit evidence.

Limitations

- To conduct our work, we relied solely on the information provided to us by the Company's executives, which we accepted in good faith as being complete, accurate, real, and not misleading.
- Accordingly, we did not subject such information to verification procedures, apart from the procedures explicitly stated in our Report and which arise from our mutually agreed methodology.
- Our engagement was limited to the Greek version of the 2024 Sustainability Report. Therefore, in the event of any inconsistency in translation between the Greek and English versions of the Report, as far as our conclusions are concerned, the Greek version of the Report shall prevail.
- No work has been conducted on data for previous reporting periods, as well as on data related to future forecasts and targets.
- No work has been conducted on anything other than the agreed scope and consequently, our opinion is limited to that scope of work

Independence

Grant Thornton implements the requirements of International Standard on Quality Control 1. Based on this, it maintains an integrated quality control system that includes policies and procedures for compliance with moral principles, professional standards and relevant legal and regulatory requirements. We comply with the independence requirements and other ethical standards of the Code of Ethics for Professional Accountants of the International Federation of Accountants issued by the International Ethics Standards Board for Accountants (IESBA), which is based on the fundamental principles of integrity, impartiality, professional adequacy, confidentiality and professional conduct. In this context, the assurance team is independent from the Company and has not participated in the preparation of the Company's 2024 Sustainability Report.

Conclusion

As per the scope and the limitations of our engagement, the procedures performed and the supporting documentation obtained, we state that nothing has come to our attention that causes us to believe that there are errors or inaccuracies that would materially affect the non-financial information, including explanatory notes and related references, as presented in the Sustainability Report for the fiscal year ended December 31st, 2024, or that the non-financial data presented has not been prepared, in all material respects, in accordance with the criteria as described in the "Scope of Work" section.

Athens, 10/9/2025

The Chartered Accountant

Athina Moustaki

CPA (GR) Reg. No.28871

ELLAKTOR
GROUP

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