

DIVERSITY POLICY

Date of entry into force: 22/11/2023

Edition : 1st final

Compilation : Group HR Director

Review : Chief Compliance Officer

Approval : C.E.O.

Recipients of the document: The approved policy shall be posted on the Intranet

Introduction

SIDMA Steel recognises that Diversity matters are a material issue for sustainable development and a matter of fundamental importance, which is embedded in the way the company operates and promotes cooperation and productivity. The company commits to ensuring that all people are treated fairly, with dignity and respect. It undertakes to ensure, for all its employees a working environment of equal opportunities, without discrimination and harassment. The diversity of its executives and Board Members, in all its aspects, contributes substantially to improving decision-making by examining issues through different views, perspectives and approaches. On the contrary, a lack of diversity may lead to a unilateral way of thinking and addressing issues and therefore to incorrect decisions.

Policy purpose

Furthermore, its purpose is to increase the awareness of SIDMA Steel employees to promote equality among employees and to enhance the inclusion of all different groups in decisions concerning their career development.

More specifically, the purpose of this Policy is to:

- Raise awareness and ensure the commitment of its employees and partners to the respect and protection of human rights in all areas of their business operation.
- Promote and enhance the principles of diversity, equality and inclusion, in line with the company's values. Also, recognising the importance of the promotion and implementation of best practices regarding the adoption and integration of the principles of diversity, equality and inclusion at all hierarchical levels, in the Board of Directors, the senior management, as well as in all the employees of SIDMA Steel.

Scope

The Diversity Policy is addressed to the Company's Management and, by extension, to the personnel. In addition, partners, suppliers and contractors of the Company are encouraged to adopt this Policy. Diversity shall also apply to members of the Remuneration and Nomination Committee and all the Board Members of the Company.

Contact

The policy, through internal communication tools, shall be disclosed to all the Company's personnel in Greece and abroad, while through its official website, it shall be accessible to all stakeholder groups.

The policy - Diversity and Participation (Diversity, Equality & Inclusion)

SIDMA Steel recognises that in an era where flexibility and creativity are the keys to competitiveness, promoting diversity in the composition of the Boards of Directors, in senior management as well as in all the employees is important for its further business development. At the same time, it recognises that diversity in the wider workplace can multiply opportunities to access a greater variety of solutions on issues relevant to its business operation, increasing its competitive advantage.

This Policy expresses the will of the SIDMA Steel Management to support diversity at all administration levels, to respect all persons, regardless of their particularities, and to use diversity, equality and inclusion to improve the Company's work culture and results.

The aim of SIDMA Steel is to provide a working environment that facilitates the well-being of its people and enables them to achieve their goals.

It also aims to create a culture that embraces diversity, equality and inclusion for all employees. Creating a safe workplace that is governed by respect for diversity, equality and inclusion is the key foundation for the personnel to successfully contribute to achieving the company's objectives and deliver sustainable business results.

Through this Policy, the SIDMA Steel Management expresses its will to support diversity at all administration levels, to respect all persons, regardless of their particularities, and to use diversity, equality and inclusion to improve the work culture and results of the Company and of the Group Companies.

Diversity: means respect and appreciation of differences. Diversity encompasses the range of similarities and differences that each individual brings to the workplace, including, but not limited to, national origin, language, race, colour, disability, gender, age, religion, political beliefs, sexual identity, sexual orientation, socio-economic status.

Equality: describes the key attitude that states that every person should have equal opportunities and equal possibilities of access and development, regardless of their personal circumstances.

In particular, it is about creating a culture that respects, promotes and benefits from diversity and gender equality as well as ensuring equal rights and opportunities for its people, attracting and developing female talents where possible and training our leaders taking into account gender equality.

Inclusion: refers to how the company ensures that an employee with diversity is included in the workplace and that the company focuses on the needs of each individual and ensures that the right conditions are in place for each person to reach their full potential. Inclusion creates a work culture and an environment that recognises, values and effectively utilises the talents, skills and potential of each employee. Inclusion is defined as the set of behaviours (culture) that encourages employees to feel valued for their unique qualities and at the same time to feel that they belong to a larger whole.

Diversity and equality assessment and management

Through diversity and equality management, SIDMA Steel

- promotes and encourages having people taking into account the principles of diversity and inclusion, creating an environment of mutual learning, respect, dignity, openness to other cultures and appreciation of diversity and different perceptions;
- the composition of the Board of Directors of the Company reflects the implementation of these principles;
- seeks to ensure that business practices, systems and corporate Processes do not prevent people with elements of diversity from having equal opportunities within the company;
- assesses whether there are barriers to the advancement and well-being of women in the workplace.

Diversity criteria in the Board of Directors. SIDMA Steel is committed to attracting and maintaining a Board of Directors whose composition reflects - as far as possible - diversity, particularly in terms of knowledge, skills, experience and abilities.

The Board of Directors of the Company, through the Remuneration and Nomination Committee, also takes into account diversity when establishing the selection criteria and the required skills in the process of recommending to the Board of Directors candidates for election to the Board of Directors. The composition of the Board of Directors shall take into account adequate gender representation, at least 25%, in its total membership. SIDMA Steel, acknowledging the benefits of the diversity of its Board members and considering that through this, inter alia, it shall maintain and enhance its competitiveness, implement this Diversity Policy with the aim of including Board members with elements of diversity and creating a diverse group of Board members. By bringing together a wide range of qualifications and skills in the selection of

Board members, a diversity of views and experience is ensured in order to make sound decisions in the best interests of the Company.

Implementation, validity and amendment

The Human Resources Department and the Compliance Directorate of the company cooperate in the development of the policy and its further revision.

The policy is approved by the CEO.

The policy is reviewed, taking into account the national and international developments, and in this context, it may be amended as appropriate.