

# Sustainability Report 2024





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# Message from the Chairman



Antonis Karadeloglou  
Chairman of the BoD

**Dear shareholders,**

We are pleased to present SIDMA Steel third Sustainability Report, a significant milestone demonstrating our dedication to creating value for our people, partners, society, and the environment. Our priority is a responsible and sustainable business approach that strengthens the confidence of all stakeholders. Through our initiatives, we support the national economy, foster social cohesion, and reduce our environmental footprint. This report is also a valuable tool for assessing our progress and identifying areas for growth, shaping our future strategies. Built on a foundation of responsibility, transparency, and innovation, we continue our journey toward a sustainable future.

We operate with environmental responsibility, continuously seeking to reduce our environmental footprint and improve our energy efficiency in full compliance with current environmental legislation. Our commitment to environmental sustainability

is demonstrated through targeted investments in environmentally friendly technologies and energy efficiency practices, enhancing the sustainable use of natural resources and driving the transition to clean energy. Notably, our electricity consumption from renewable energy sources increased significantly by 23.4% in 2024 compared to 2023, reaching 53% of our total consumption. Furthermore, we place strong emphasis on waste management, prioritizing reduction, reuse, and recycling to minimize our environmental footprint.

The dedication and skills of our people are fundamental to our operation and development, driving the achievement of our objectives. We are dedicated to maintaining a modern, supportive, and meritocratic working environment that empowers everyone to develop their skills and advance both professionally and personally. We actively foster a culture of trust, cooperation, and mutual respect, encouraging active participation, creativity and continuous learning. At the same time, we ensure

that our working environment is characterized by equal opportunities for all, rejecting any form of discrimination and maintaining intact our commitment to the protection of human and labor rights.

A commitment to volunteering and social contribution is deeply embedded in our culture. By encouraging our employees to participate in diverse initiatives, we aim to strengthen solidarity and actively support local institutions and the communities where we operate. These initiatives, spanning a wide spectrum, reinforce team spirit and our sense of social responsibility, ultimately allowing us to offer meaningful support to those in need and contribute to a more cohesive and prosperous society.

Occupational Health and Safety is fundamental to our daily operations and is a cornerstone of our corporate culture. We employ an organized and responsible approach encompassing systematic prevention and control measures, aiming to create a working environment where the likelihood of

**“These initiatives, spanning a wide spectrum, reinforce team spirit and our sense of social responsibility, ultimately allowing us to offer meaningful support to those in need and contribute to a more cohesive and prosperous society”.**

incidents or near misses is significantly reduced. Continuous information and awareness among our people are a key priority, evidenced by the 20.8% increase in Health & Safety training participants in 2024 compared to 2023. This approach enhances knowledge, responsibility, and prevention, driving us toward a safer working environment.

SIDMA Steel operates with a modern and responsible corporate governance framework as the core of our daily operations. Guided by the

principles of transparency, accountability, and credibility, we ensure that every decision we make reflects our commitment to responsibility and compliance. Recognizing the critical significance of ethical conduct, we have a zero-tolerance policy for corruption and bribery. To continuously strengthen our foundation, we invest in policies and mechanisms that enhance corporate governance, internal control, and risk management, fostering trust-based relationships with all our stakeholders.

Guided by our respect for people, society, and the environment, continuous improvement is integral to our pursuit of responsible development. Our actions are focused on actively shaping a sustainable future, a future ensuring equality, prosperity, and stability for generations ahead.

**Antonis Karadeloglou**  
Chairman of the BoD





# Company Profile

# 01





# The Company

SIDMA Steel S.A. stands as a leading force in Greece for the trading and industrial processing of steel products. Furthermore, the Company is also operating in the design and production of metal composite panels and construction elements. Established in 1931, SIDMA Steel has been publicly traded on the Athens Stock Exchange since 2005.

Having maintained a strong presence in the market for many years, the Company has become a reliable partner, renowned for its integrated solutions that seamlessly combine experience, innovation, and specialized know-how.

Operating modern facilities in key locations in Greece, the Company efficiently processes and distributes a wide array of steel products to meet the demands of various industrial and construction sectors. Moreover, it is dedicated to producing specialized building products, leveraging cutting-

edge technologies and adhering to high quality standards.

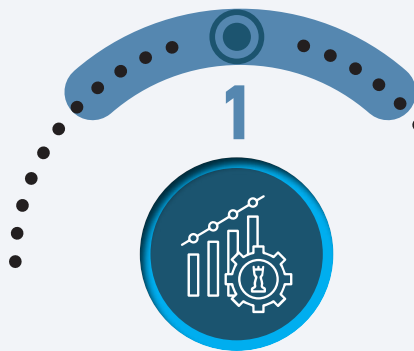
Sustainable development is a fundamental aspect of SIDMA Steel strategy, integrating environmental footprint reduction, economic contribution, and the establishment of a safe and equitable working environment. By continuously investing in innovative technologies and the expertise of its people, SIDMA Steel not only sustains its leadership in the Greek market but also strategically enhances its international presence.





SIDMA Steel remains committed to aligning its strategic priorities with the principles of sustainability, as presented below:

## Strategic Priorities



We strive to remain leaders in the Greek steel market and gain a leading position in the international market.

We strive to achieve our goals through teamwork, while maintaining our safe and merit-based work environment that offers all employees opportunities for professional growth and the development of their knowledge and skills.



We strive to build long-term partnerships with our customers, understanding their needs and responding promptly to them, honouring our commitments, offering innovative solutions through high-quality products and services.

We strive to be an exemplary Company for society as a whole - one that is constantly evolving through a strong sense of responsibility, distinguished by our sensitivity towards our people and the efforts we make to protect the natural environment and support vulnerable social groups.



# The Group

For the Group, sustainable development is not merely a commitment, but an integral part of our operations.

Respecting both the environment and people, we continuously invest in new technologies to reduce our energy footprint and promote renewable energy sources. Simultaneously, we prioritize creating a safe and fair working environment, emphasizing the development and support of our people. Our aim is responsible growth, combining business success with social contribution to shape a better future for all.





# Vision, Mission and **Values**



## Vision

SIDMA Steel envisions a future where it not only remains a leading player in the Greek steel market but also dynamically expands its presence across the wider Balkan region. Its aim is ongoing development, providing quality products and innovative solutions creating significant value for its customers. Fueled by its experience and inherent dynamism, it seeks to build a robust and sustainable future for the Company, its employees, and society.



## Mission

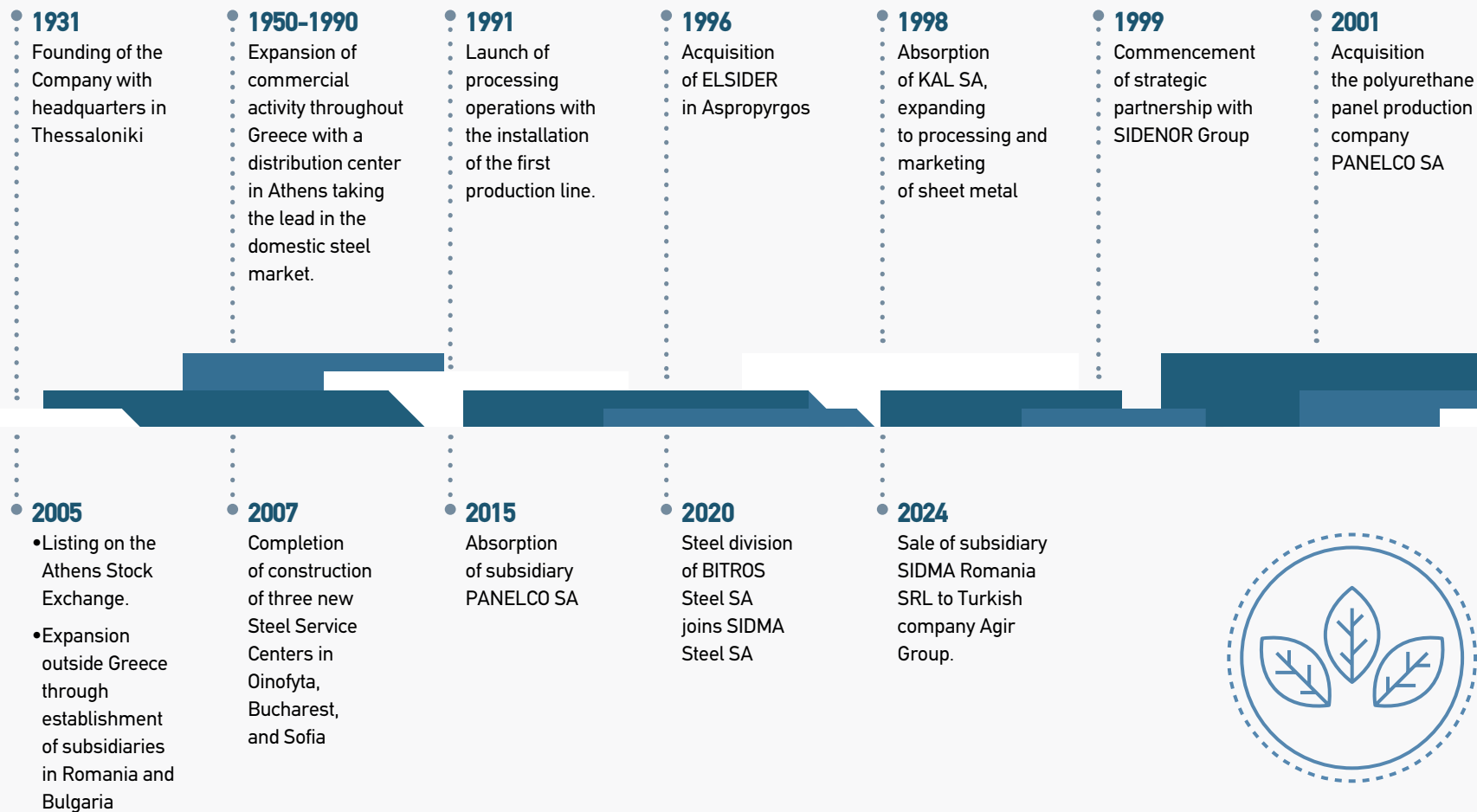
SIDMA Steel mission is to provide reliable, high-quality solutions that directly address customer needs. We continuously invest in innovation and technology to deliver superior products and services at competitive prices. We believe that our success is defined not only by financial performance, but also by the lasting trust we cultivate with our partners every day.



## Values

SIDMA Steel operates on fundamental values including cooperation, integrity, and a strong commitment to quality. The Company trusts its human resources, cultivating a working environment that promotes development, knowledge acquisition, and innovation. Actively demonstrating responsibility towards the environment and society, it blends tradition with ongoing progress. For SIDMA Steel, true success is achieved through sustainable growth that generates added value for both its customers and the wider community.

# 93 years of history

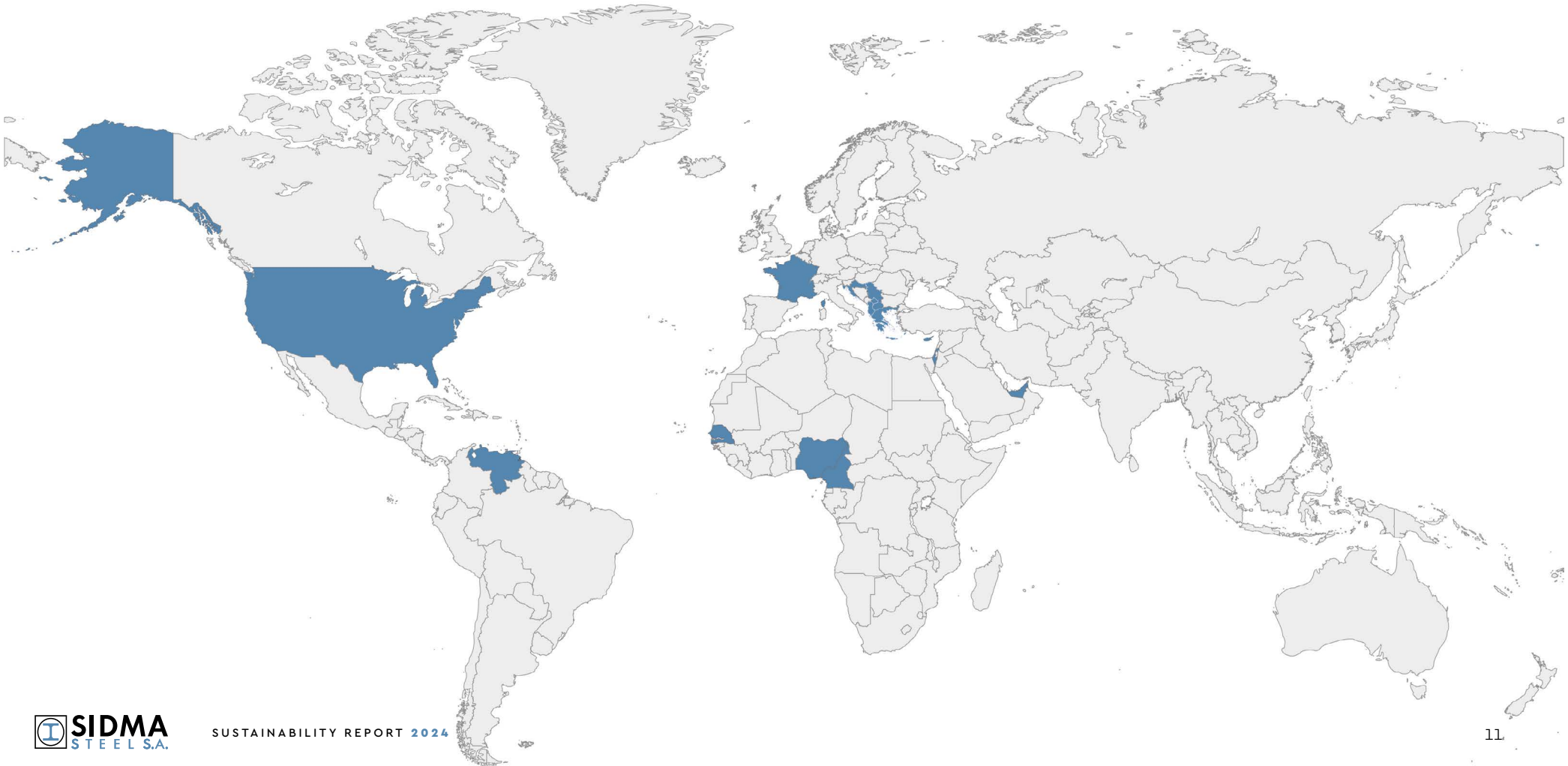




# International Presence

Beyond Greece, SIDMA Steel maintains a dynamic presence in international markets, consistently strengthening its footprint abroad. The Group actively operates in **Albania, Bulgaria, Serbia, North Macedonia, and Cyprus**. Simultaneously, it has expanded its global reach through exports to countries including **France, Croatia, Kosovo,**

**the United Arab Emirates, the United States, Israel, Cameroon, Nigeria, Senegal, and Venezuela**. Throughout this extensive network, the Company offers high-quality steel products, as well as building and coating products, reinforcing its leading position and solidifying its reputation as a reliable international partner.



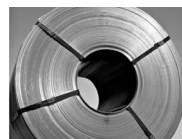
# Our products

The main product categories, on which our manufacturing and commercial activity is focused on, depending on the final form of the products, are: flat products, long products, tube products, wire products (representation), and Prefabricated building elements.

## Flat Products



**Hot Rolled Coils and Sheets (Black)**



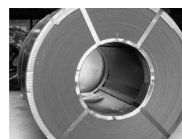
**Hot Rolled Pickled Coils and Sheets**



**Hot Rolled Coils and Sheets with Surface Pattern**



**Cold Rolled Coils and Sheets**



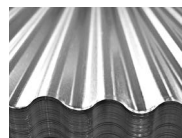
**Galvanized Coils and Sheets**



**Pre-painted Coils and Sheets**



**Plastified Coils and Sheets**

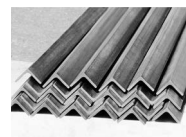


**Galvanized Sheets Corrugated and Trapezoidal**



**Quarto & Shipbuilding Plates**

## Long products



**Commercial Iron**



**Wide Flange**



**Crane Rails - Steel Rails**



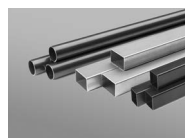
## Tube Products



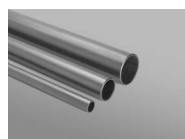
**Hollow Structural  
Section as Rolled  
& Galvanized**



**ERW Construction  
& Scaffolding  
Steel Tubes**



**Thin Wall Tubes**



**ERW Construction  
Galvanized Steel  
Tubes**

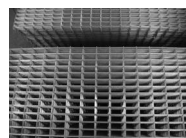
## Wire Products



**Galvanized  
Wire**

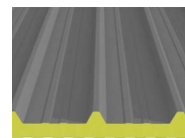


**Black Wire**

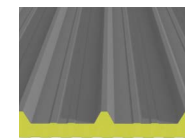


**Galvanized  
Fencing Mesh**

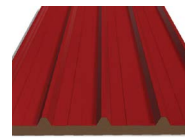
## Metal Composite Panels and Construction Elements



**Polyurethane  
Panels Roof**



**Polyisocyanurate  
Panels (PIR)**



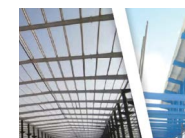
**Mineral  
Wood Panels**



**Trapezoidal  
Profiles**



**Frigo Panels**



**Purlins/  
Flashins**

# Our facilities

The Company has four manufacturing and production facilities in Greece and abroad, as well as sales offices:

- ▶ The Company's headquarters, the Commercial Department, and the distribution and processing center are in **Aspropyrgos, Attica**
- ▶ Administrative Services for the region, the Commercial Department, and the Distribution and Processing Center are in **Oraiokastros, Thessaloniki**
- ▶ Production facilities of metal building materials and insulation panels are in the **Lamia Industrial Area**.
- ▶ **Bulgaria**, has a Distribution and Processing Center



## Aspropyrgos

35 acres

13.500 m<sup>2</sup>

Shotblasting Machine/CNC Lased & Bed for Metal Cutting/Saw

35.000 M.T.

60% of total sales



## Thessaloniki

53 acres

20.000 m<sup>2</sup>

Slitting and Cut-to-length lines

100.000 M.T.

30% of total sales



## Lamia

43 acres

10.500 m<sup>2</sup>

Production Facilities of Polyurethane Panels

2.000.000 m<sup>2</sup>

10% of total sales



## Bulgaria

35 acres










9.000 m<sup>2</sup>

Slitting and Cut-to-length lines

100.000 M.T.

# Creating added value

Through its operations, SIDMA Steel aims to create added value for all stakeholders, enhancing its positive impact on society and the economy. It generates employment and implements social initiatives, contributing to both the strengthening of the national economy and the support of local communities.

Inflows	Business Activities and Values	Products and Services	Outflows: The value we create		Sustainable Development Goals (SDGs)
<b>FINANCIAL CAPITAL</b> <ul style="list-style-type: none"> <li>Equity</li> </ul>	<b>OUR VISION</b> SIDMA Steel envisions a future where it not only remains a leading player in the Greek steel market but also dynamically expands its presence across the wider Balkan region. Its aim is ongoing development, providing quality products and innovative solutions creating significant value for its customers. Fueled by its experience and inherent dynamism, it seeks to build a robust and sustainable future for the Company, its employees, and society.	<b>OUR OPERATIONS:</b> SIDMA Steel is a leading company in the trading and industrial processing of steel products. The main product categories, on which our manufacturing and trading activity is focused on, based on the final form of the products, are: flat products, long products, tube products, wire products (representation), and prefabricated building elements.	<b>FINANCIAL CAPITAL</b> <ul style="list-style-type: none"> <li>Turnover € 141,709,487</li> </ul>	<b>GOVERNANCE</b> <ul style="list-style-type: none"> <li>Ensuring regulatory compliance and business ethics</li> <li>Emergency Situations - Business Continuity</li> </ul>	        
<b>HUMAN CAPITAL</b> <ul style="list-style-type: none"> <li>160 employees</li> <li>Knowledge, skills and competences</li> <li>Ethical values</li> </ul>			<b>HUMAN CAPITAL</b> <ul style="list-style-type: none"> <li>2128 training hours (in Greece and abroad)</li> <li>20% women senior executives</li> </ul>	<b>PEOPLE</b> <ul style="list-style-type: none"> <li>Creating and distributing direct and indirect economic value</li> <li>Promoting health, safety and well-being</li> <li>Contributing to training and development of employees</li> <li>Protecting and promoting human rights</li> </ul>	
<b>NATURAL CAPITAL</b> <ul style="list-style-type: none"> <li>Air</li> <li>Water</li> <li>Raw materials and materials</li> <li>Energy</li> </ul>			<b>NATURAL CAPITAL</b> <ul style="list-style-type: none"> <li>1,222.74 MWh RES production</li> <li>1,578.9t CO2e total emissions</li> </ul>	<b>ENVIRONMENT</b> <ul style="list-style-type: none"> <li>Mitigation and adaptation to climate change</li> <li>Conservation of natural reserves of raw materials and materials</li> </ul>	
<b>PRODUCTIVE CAPITAL</b> <ul style="list-style-type: none"> <li>Business units</li> <li>Production plant</li> </ul>			<b>PRODUCTIVE CAPITAL</b> <ul style="list-style-type: none"> <li>514,785.36 MWh energy consumed in total (electrical and thermal)</li> </ul>		
<b>INTELLECTUAL CAPITAL</b> <ul style="list-style-type: none"> <li>Patents</li> <li>Royalties</li> <li>Protocols, Procedures</li> </ul>			<b>INTELLECTUAL CAPITAL</b> <ul style="list-style-type: none"> <li>Adoption of Sustainable Development Policy</li> </ul>		
<b>SOCIAL CAPITAL</b> <ul style="list-style-type: none"> <li>Domestic suppliers</li> <li>Foreign suppliers</li> </ul>	<b>OUR VALUES</b> SIDMA Steel operates on fundamental values including cooperation, integrity, and a strong commitment to quality. The Company trusts its human resources, cultivating a working environment that promotes development, knowledge acquisition, and innovation. Actively demonstrating responsibility towards the environment and society, it blends tradition with ongoing progress. For SIDMA Steel, true success is achieved through sustainable growth that generates added value for both its customers and the wider community.		<b>SOCIAL CAPITAL</b> <ul style="list-style-type: none"> <li>€ 179,021,824 in suppliers (domestic and foreign)</li> </ul>		



# Sustainable development lies at the core of our operations

Recognizing the importance of sustainable development for long-term success and effective response to challenges, the Company firmly integrates its principles into its strategy and implements actions to reduce its environmental impact and create a positive social footprint. Simultaneously, it establishes solid corporate governance structures, promoting transparency, integrity, and accountability throughout its operations. The following sustainable development pillars have been established:

## Good corporate governance and responsible operation

The Company operates responsibly and transparently, in full compliance with applicable legislation, and seeks cooperation and responsible business conduct of its suppliers and partners, aligning with principles of responsible business conduct.

## Caring for people and the society

Acknowledging the pivotal role of its people in its success and growth, the Company cultivates an inclusive and equitable work environment, offering opportunities for both personal and professional development. Moreover, the Company actively engages with local communities where it operates, contributing to a positive social footprint.

## High-quality products and services

The Company is committed to maintaining high quality in its products and services and ensuring stakeholder satisfaction through investments in innovative solutions and international practices.

## Environmental responsibility

The Company assesses the environmental impact of its activities and takes necessary measures to minimize its footprint by implementing initiatives to reduce energy consumption, emissions, and improve waste management.

At SIDMA Steel we recognize the value of creating a framework to properly and effectively manage issues of sustainable development. To this end, we have established and implemented Sustainable Development Policy and we have also appointed a Sustainable Development Unit.

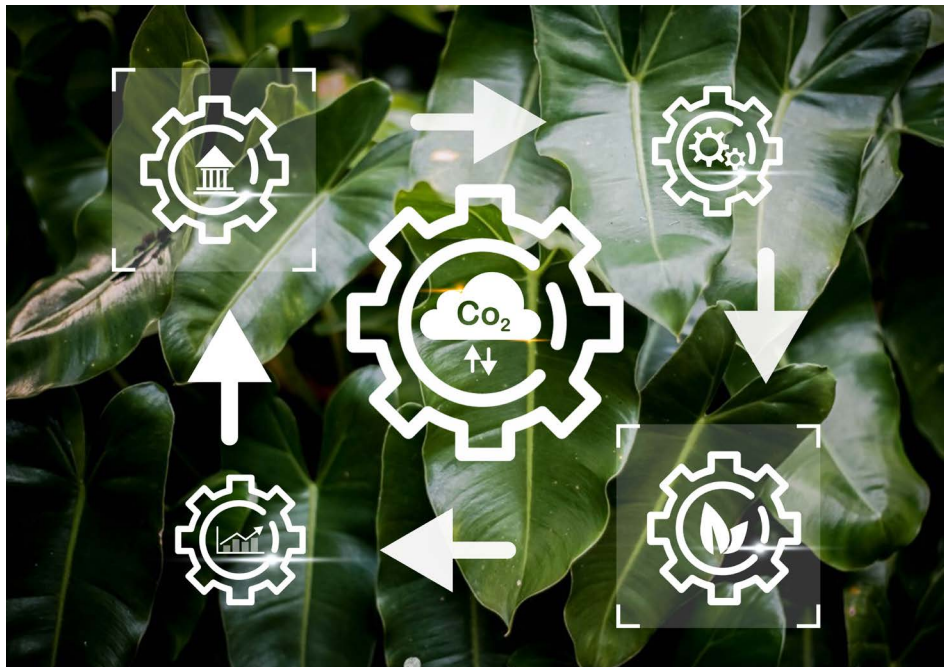
## Sustainable Development Policy

Our Sustainable Development Policy dovetails with our principles and values (responsibility, transparency, effectiveness, innovation) and underlines our commitment to responsible business operation. The Policy is determined by Senior Management, who are tasked

with effectively managing the various issues associated with our efforts towards sustainable development. Specifically, Senior Management is responsible for implementing the Policy vertically throughout all Company activities, while ensuring compliance with

the applicable legislation and full implementation of standards, policies, and directives. Under the policy, Senior Management is responsible for issues associated with effective communication and creation of added value for stakeholders, upholding all

internationally recognized human and labor rights, ensuring a healthy and safe work environment. Beyond these matters, Senior Management is also tasked with taking action to reduce our environmental footprint and substantially support the local community.



## Sustainable Development Unit

The Board of Directors established the Sustainable Development Unit by formal decision. As per the provisions of its Operational Regulation, the Unit is responsible for monitoring and evaluating the Company's performance and formulating proposals regarding social contribution and collective objectives particularly in sustainable

development, environmental, social, and governance issues (ESG). Furthermore, the Unit monitors the integration of non-financial factors into the business strategy and decision-making, aiming to ensure the Company's resilience and effective management in its operating environment.



# Stakeholders

Open and two-way communication with its stakeholders is vital to the Company, as they are directly affected by its operations and play a role in shaping its decision-making and the achievement of its objectives.

The Company has identified the following groups as its key stakeholders:

Shareholders → Investors → Employees → Customers → Suppliers → State/Authorities → Local Communities → Financial Institutions

A detailed table with the stakeholder groups, the applicable channels of communication, their main issues of interest, as well as how the Company responds to them, can be found in the Annex, on p. 95.



# Materiality Analysis

In 2023, recognizing the significance of a meaningful approach to sustainability issues, SIDMA Steel implemented a structured materiality analysis procedure, which was updated in 2024. This procedure involved mapping and assessing

issues of importance to the Company and its stakeholders, aiming to optimize its strategy towards a more responsible and sustainable business operation. At the same time, the evaluation and prioritization process was based on the guidelines

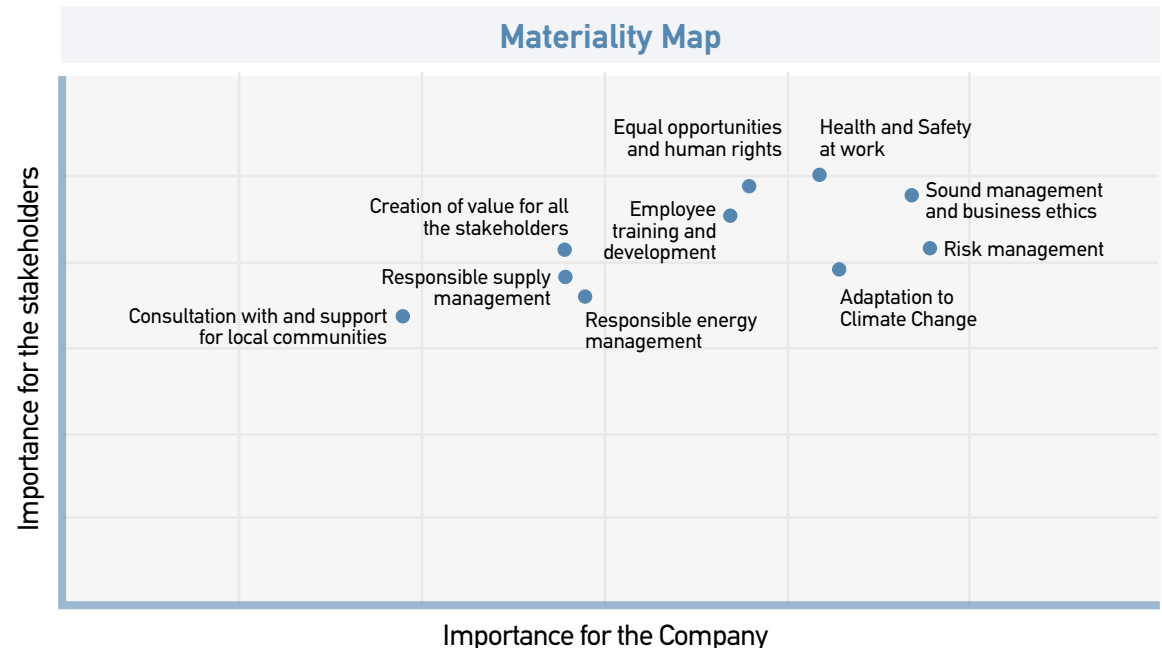
of GRI Standards, as well as the Sustainability Accounting Standards Board (SASB) industry categorization and assessment.

Through the identification of material issues, the Company can monitor

its performance on sustainable development issues and establish specific targets aligned with its long-term strategy. Simultaneously, it helps identify opportunities, weaknesses, strengths, and risks across its areas of operations.

The materiality analysis is carried out through the following steps:

- STEP 1<sup>st</sup>** Identifying sustainability issues that concern the Company, through analysis of the Group's international, national and sector-specific environment, as well as collecting recorded issues of concern to the Company's stakeholder groups.
- STEP 2<sup>nd</sup>** Assessment of issues deemed important for stakeholder groups, through assessment of the pressure exerted on the Company regarding each material issue by each stakeholder group.
- STEP 3<sup>rd</sup>** Elntegration of the risks associated with each issue, based on the sectors the Company operates in.
- STEP 4<sup>th</sup>** Prioritization, aggregate assessment and recording of material issues. Finalization of these through approval by the Company's management.





# Our contribution to the Sustainable Development Goals (SDGs)

Through our operations, we strive to contribute to the achievement of the 17 UN Sustainable Development Goals, which are aimed at balanced economic, environmental, and social development. At SIDMA Steel, we have adopted the UN's 2030 Agenda, as expressed in the Sustainable Development Goals, with particular focus on those goals connected to our operations. The following table reflects the Company linking its material issues to the Sustainable Development Goals:

Material Issues	
<b>Environment</b> <ul style="list-style-type: none"> <li>• Adaptation to the Climate Change</li> <li>• Responsible energy management</li> </ul>	   
<b>Society</b> <ul style="list-style-type: none"> <li>• Health and Safety at work</li> <li>• Equal opportunities and human rights</li> <li>• Employee training and development</li> <li>• Consultation with and support for the local communities</li> </ul>	    
<b>Governance</b> <ul style="list-style-type: none"> <li>• Sound management and business ethics</li> <li>• Risk management</li> <li>• Creation of value for all the stakeholders</li> <li>• Responsible supply management</li> </ul>	 

Subsequent to the materiality analysis, the Company formulated specific goals that are aligned with the principles of sustainable development, the UN Sustainable Development Goals (SDGs), and the needs and expectations of its internal and external partners.

This approach is the foundation for the development of actions with a positive social and environmental footprint, while ensuring the long-term sustainability of the Company.

## Sustainable Development Goals

Material Issue	Goal	Year	Sustainable Development Goal
Adaptation to the Climate Change	Full implementation of a natural hazard resilience plan in all facilities by 2030.	2030	 
Responsible energy management	Decrease in total energy consumption by 20%	2030	 
Health and Safety at work	Achieve zero serious occupational accidents per year (LTIR < 1).	2025	 
Equal opportunities and human rights	Maintain gender balance in positions of responsibility (at least 20% women).	2027	
Employee training and development	2000+ training hours	2025	
Sound management and business ethics	100% compliance with the Code of Conduct at all levels. Implementation of a digital platform	2026	
Risk management	Inclusion of ESG risks in all ERM schemes. Development of an "ESG Risk Score" indicator and monitoring by the Board.	2030	
Creation of value for all the stakeholders	Adopt an equal opportunities policy and increase the representation of women in decision-making positions by 10%	2030	 
Responsible supply management	100% of key suppliers to have been assessed against ESG criteria.	2028	

# Prioritizing Quality

SIDMA Steel steadfastly adheres to its commitment to the production, marketing, and processing of high-quality products and services, with the goal of satisfying customers and fostering a relationship of trust with them.

The primary objective of the Company's Quality Management System is to establish a foundation for the continuous improvement of its processes, ultimately ensuring the full satisfaction of its customers' needs and expectations. The Company is committed to offering the best possible results, fostering long-term relationships built on trust.

The key principles governing the Company's Quality Management System are as follows:

- 1** Strict adherence to all applicable laws and regulations. 
- 2** Ongoing after-sales support for its customers and close cooperation with its suppliers. 
- 3** Ongoing training and briefing of its employees. 
- 4** Analyzing and understanding the reasons for any irregularities or complaints and implementing appropriate corrective actions. 
- 5** Operating in an environmentally conscious manner, always following the legal requirements related to climate change. 

SIDMA Steel applies an Integrated Quality Health & Safety Management System in accordance with the requirements of the EL0T EN ISO 9001:2015 and ISO 45001:2018 standards.





As part of this commitment, Management supports and continuously enacts the basic principles and rules of the Quality Management System, defining clear objectives and reinforcing cooperation with employees and partners. Subsequently, it has invested in the following pillars:

**Modern management  
procedures**

**Continuous  
improvement  
of mechanical  
equipment**

**Specialized human  
resources**

**Information and training  
of employees at all levels  
on quality and health and  
safety issues**

**Implementation of  
appropriate processes  
to respond effectively to  
customer requests**

**Timely identification of risks  
and opportunities across the  
entire range of operations**






The Company's strategy and commitment are based on the regular monitoring of the System and objectives related to all its activities and operations. This includes internal audits conducted at all facilities at least quarterly, in collaboration with an external partner. Additionally, Management receives regular performance updates through at least three annual meetings with Managers and the Quality and Health & Safety Management System (SQMS) Officer.

# Ongoing development and innovation

Demonstrating its commitment to environmental protection and sustainable development, SIDMA Steel proactively certifies products with potential environmental impact against international controls, requirements, and standards. Being a member of the German emission control body GEV enables the Company to offer products that qualify for LEED, BREEAM, and HQM building sustainability certifications. Furthermore, all panel categories boast EMICODE EC1PLUS certification (the highest rating for very low gas emissions), ensuring their safe application for both people and the environment.

Furthermore, the Company holds SRM (Sourcing of Raw Materials) and VOC Emissions (Volatile Organic Compounds Emissions) certifications, demonstrating its commitment to raw material traceability and the control of VOC emissions for health and environmental protection.

Additionally, the Company has acquired LCA (Life Cycle Assessment) certification, leading to the issuance of an Environmental Performance Certificate (Environmental Product Declaration - EPD) and a Health Product Declaration (HPD). These tools enable the Company to monitor and evaluate potential environmental impacts across the entire product life cycle, thereby contributing to environmental protection and strengthening its positive footprint.

Product Certifications with Positive Environmental Footprint	
	<b>EMICODE GEV - EC 1PLUS:</b> PIR PANEL 80MM ROOF (PBR80 1000) SIDE WALL (PBCW801000)
	<b>ROOF &amp; WALL COVERING POLYURETHANE PANELS</b> <b>ROOF &amp; WALL COVERING POLYISOCYANURATE PANELS</b>
	<b>EPD for PUR panels:</b> Roof & Wall Covering Polyurethane Panels
	<b>EPD for PIR panels:</b> Roof & Wall Covering Polyisocyanurate Panels
	<b>EPDs / PANEL POLYURETHANE (PUR) - ROOF PSR1000, Factory</b> (30mm, 40mm, 50mm, 60mm, 80mm, 100mm)
	<b>EPDs / PANEL POLYURETHANE (PUR) - WALL PSCW1000 &amp; PSW1000</b> (30mm, 40mm, 50mm, 60mm, 80mm, 100mm, 120mm, 140mm, 150mm, 160mm, 180mm, 200mm)
	<b>PANEL POLYISOCYANURATE (PIR) - ROOF PBR1000</b> (30mm, 40mm, 50mm, 60mm, 80mm, 100mm)
	<b>PANEL POLYISOCYANURATE (PIR) - WALL PBCW1000 &amp; PBW1000</b> (30mm, 40mm, 50mm, 60mm, 80mm, 100mm, 120mm, 140mm, 150mm, 160mm, 180mm, 200mm)

# Customer-centered approach

SIDMA Steel aims to provide innovative, high-quality products and services that meet its customers' requirements and expectations, fostering trust. To ensure it understands and responds effectively to customer needs, the Company utilizes continuous communication, high-quality service and satisfaction surveys. This specific process reinforces the Company's customer-centric culture and aims to support customers in the best possible way:



## Continuous Communication

The Company has established communication channels with its customers to receive and record feedback and comments, which inform its strategic and operational decisions, as well as any additional actions taken. Furthermore, through the product returns form, it implements necessary corrective actions where required.

## Service and responsiveness

To ensure excellent customer service, the Company has implemented an order quotation process that comprehensively evaluates its understanding of customer requirements, conditions, technical specifications, the adequacy of raw materials, and its capacity to meet delivery schedules.

## Customer Satisfaction Assessment

The evaluation of customer satisfaction is particularly important, which is why the Company collects

and analyzes customer opinions and feedback through a specialized questionnaire, both per facility and overall. In 2024, customer satisfaction reached 91% based on these questionnaires, exceeding the Company's target by 14% (80%).

# 91%

## Customer satisfaction in total

A key aspect of this approach is the training of customer personnel by the Company's sales staff, which includes appropriately trained engineers with in-depth product and application knowledge. This training reflects the Company's understanding that customer support extends beyond the sale to the optimal utilization of products.



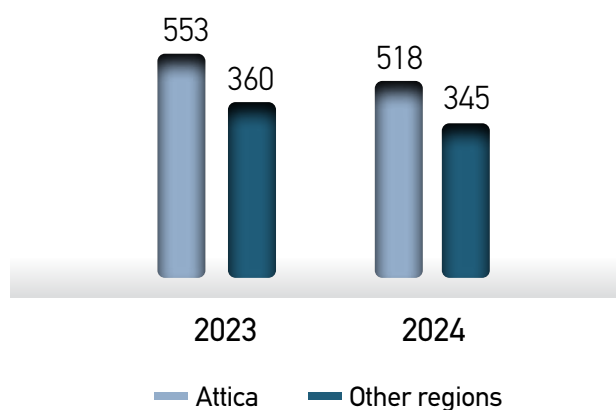
# Responsible **supply chain**

SIDMA Steel growth is built upon the cultivation of trusting relationships with both customers and its suppliers. This involves a proactive approach to ensuring a responsible supply chain, with practices that enhance sustainability and create mutually beneficial relationships with suppliers. To maintain close ties, the Company prioritizes daily communication through its various channels and direct personal interaction.

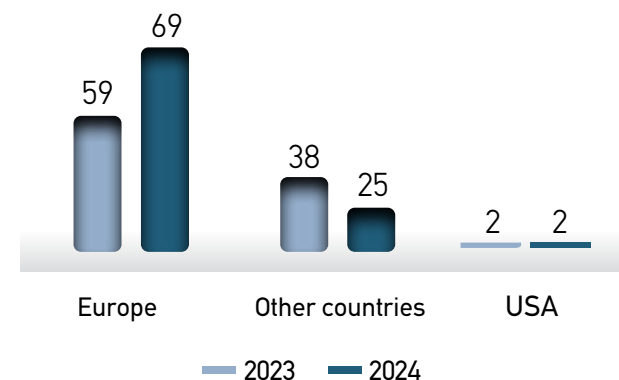
The Company mainly collaborates with foreign suppliers for raw materials while it chooses to work with local suppliers, where possible, in order to support the local community.

## Suppliers' geographical analysis

### Domestic Suppliers geographical analysis



### Foreign Suppliers geographical analysis



Acquisition rates from suppliers	2023	2024
Acquisitions from domestic suppliers	53%	49%
Acquisitions from foreign suppliers	47%	51%

The Company evaluates potential suppliers based on objective criteria, including price and the quality of their offerings, thereby ensuring a fair and equal opportunity for all. New suppliers are required to commit to the Company's Code of Conduct & Business Ethics for Suppliers and Partners. The Code promotes integrity, transparency, and good professional conduct, defining how the Company conducts its business with customers, suppliers, and other partners. To ensure reliable and uninterrupted supply, the Company seeks to collaborate with environmentally aware and socially responsible suppliers. These suppliers are required to submit their applicable codes, policies, and procedures, as well as complete a questionnaire on ESG issues.

In addition, when the total value of the contract exceeds €100,000 per project, the Company applies a due diligence procedure, which is described in the Third-Party Due Diligence Policy. The Company's due diligence process for responsible supply chains adheres to the OECD's main guidelines for Conflict and Other Risk Areas, with a focus on evaluating risks associated with responsible sourcing, respect for human rights, anti-corruption

policies, and the journey of metal from potentially high-risk regions. As part of this process, prior to any agreement, a member of the Procurement Department, working with the Compliance Officer, verifies the appropriateness and satisfactoriness of the supplier/contractor's operations and past performance. It also confirms that the supplier has received and signed the Suppliers Code of Conduct and has been assessed through a specific questionnaire regarding the fight against corruption and bribery.

### Evaluation of suppliers and partners

The Company employs a specific supplier evaluation process, guided by the criteria of its Supplier Code of Conduct, with the aim of continuously improving its supply chain.

This evaluation extends beyond traditional factors like product quality, reliability, and economic conditions to encompass environmental, labor, and social criteria established by SIDMA Steel.

Number of evaluated suppliers*	2023	2024
Number of suppliers evaluated during the year	330	216
Number of suppliers evaluated against environmental criteria	39	15
Number of suppliers evaluated against labour and social criteria	39	15

*\*The Company's total active suppliers for the respective year.*

# Participation in Organizations and awards

As part of our efforts to enhance communication with key Company stakeholders who make major contributions to the development of our activities, SIDMA Steel participates in the following organizations:



The Hellenic Federation of Enterprises (SEV) is an association based in Athens, the primary purpose of which is the representation of Greek enterprises and industries and the furthering of their interests, primarily on a national level.

## Association of Greek Importers-Exporters of Steel Products

SIDMA Steel is an active member of the Association of Greek Importers-Exporters of Steel Products



GEV's main objective is to promote consumer protection, workplace safety, and environmental protection within the construction chemicals and adhesives sector.

Recognising their impactful efforts in sustainable development throughout 2024, SIDMA Steels received the following prestigious awards:



SIDMA Steel received certification from Synesgy for its business strategy, which is guided by the principles of social responsibility, circular economy and sustainable development and is based on ethical and honest relationships with its partners.



In 2024, for the third consecutive year, SIDMA BULGARIA EAD received the Bronze award for its business best practices and commitment to sustainable development according to the ECOVADIS Sustainability Rating system.



# With respect to the environment



# Our environmental approach

SIDMA Steel recognizes the essential role of environmental protection in sustainable development and adopts an integrated environmental approach aimed at the ongoing improvement of the environmental performance reducing its ecological footprint.

The Company adopts the principles of the circular economy and applies the best practices of the sector, systematically investing in environmentally friendly technologies and the efficient management of natural resources, with a particular emphasis on renewable energy sources, water, and waste.

In addition, the Company places particular emphasis on informing and training staff on energy and environmental issues, fostering ecological awareness on a daily basis throughout all operations.

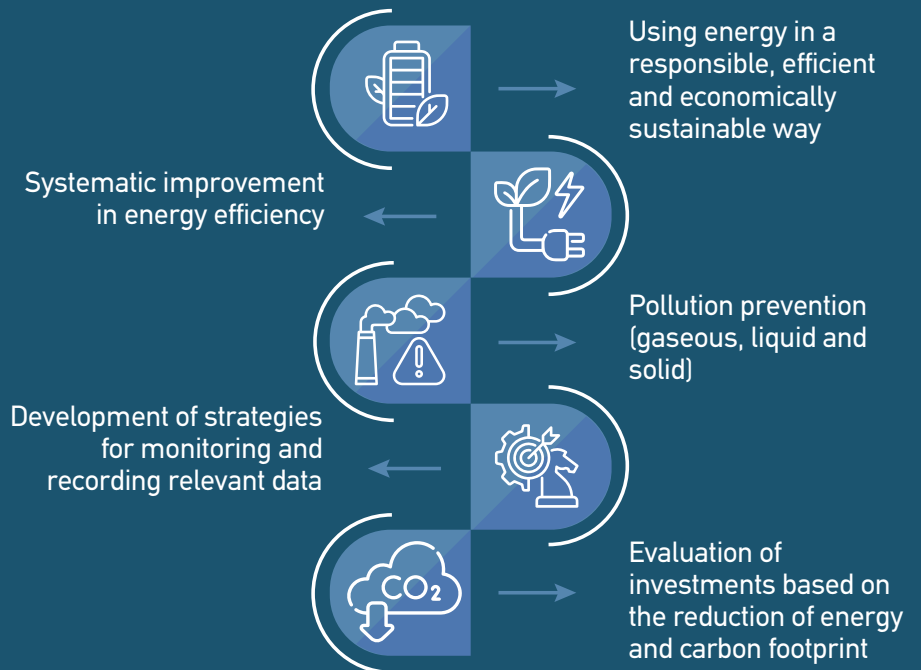
## Environmental Policy

The Environmental Policy corroborates the Company's strategy to actively participate in the global effort to tackle Climate Change. As a consumer of both renewable and non-renewable energy, SIDMA is committed to the responsible, efficient, and cost-effective purchase and use of energy, aiming to reduce its carbon footprint.

"Recognizing the significance of climate change and stakeholder demands, SIDMA Steel assesses the compliance of its operations with applicable requirements and analyses the impact of its products and services on the environment."

*\*Extract from the Company's Policy*

SIDMA Group applies responsible energy management practices aiming at sustainability and environmental protection:



# Energy efficiency

SIDMA Steel recognizes energy as a paramount environmental aspect of its operations and aims for continuous improvement in its energy performance. The Energy and Climate Change Policy includes specific commitments regarding the reduction of its carbon footprint through monitoring of energy consumption and investments in efficient technologies.



## 3968MWh

Total energy consumption

## 1222.74MWh

Production from R.E.S.



## Investing in sustainable energy

Demonstrating a steady investment in green energy, SIDMA Steel is increasing its electricity production from Renewable Energy Sources with photovoltaic stations in Athens and Thessaloniki.

Furthering this commitment in 2024, SIDMA Bulgaria commissioned an impressive 450 kWp photovoltaic

power plant entirely on its rooftop. This large-scale installation not only highlights the Company's dedication to sustainable development but also significantly enhances its energy independence. The system is projected to generate 494,235 kWh of electricity each year, covering 80% of the Company's total annual energy consumption



The annual consumption of electricity produced by RES amounted to 991.3 MWh in 2023 and 1222.74 MWh in 2024, corresponding to 53% of the total electricity consumption.

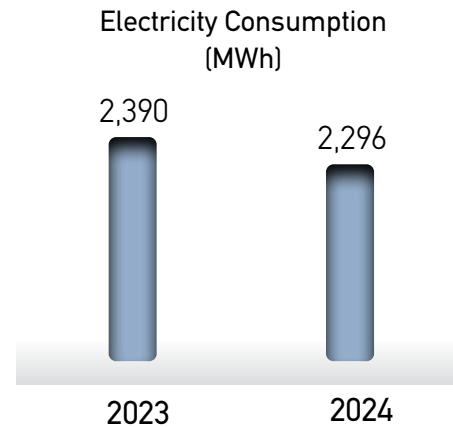




## Electricity consumption

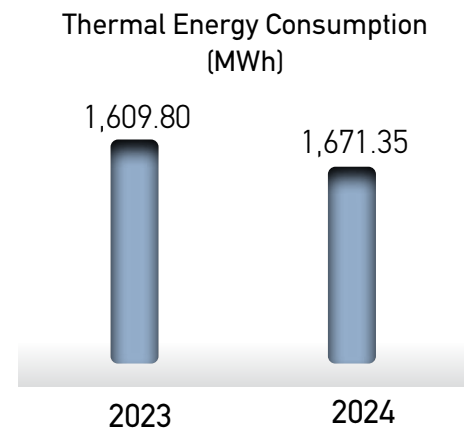
Electricity is mainly used for part of the production facilities and the operation of offices, including lighting and equipment.

In 2024, a 4% reduction in electricity consumption was achieved as a result of targeted energy efficiency interventions.



## Thermal energy consumption

For the smooth operation of its facilities and to fuel its fleet, the Company relies on natural gas and oil for thermal energy. The launch of a new production line at Industrial Area of Lamia in 2024 drove a 23% increase in natural gas use, contributing to an overall 4% rise in the Company's thermal energy consumption.





# GHG Emissions

As part of its commitment to sustainable development, SIDMA Steel monitors and evaluates annually the greenhouse gas (GHG) emissions associated with its operations, in accordance with the GHG Protocol and the GRI Guidelines.

The strategic objective, as defined in the Energy and Climate Change Policy, is to reduce its footprint, both through improving energy efficiency and through the responsible choice and use of fuels and raw materials. The Company classifies

its greenhouse gas (GHG) emissions into two primary categories: Direct emissions (Scope 1) and Indirect emissions (Scope 2). Scope 1 emissions encompass those directly resulting from the Company's controlled operations, including fuel

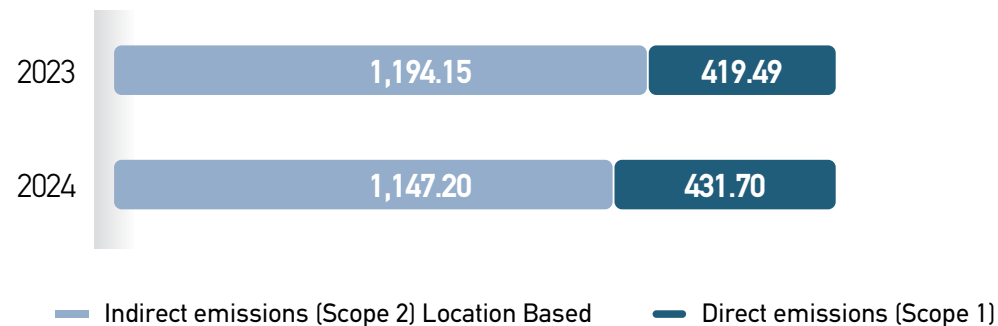
combustion in facilities and vehicles, and the use of refrigerants. Indirect emissions (Scope 2) are linked to the consumption of purchased electricity. In 2024, the Company experienced a 3% rise in Scope 1 emissions and a 4% decline in Scope 2 emissions.



## 1578.9t

Total emissions CO<sub>2</sub>e  
in 2024

The Company's total emissions  
(t CO<sub>2</sub>e)



*In this Sustainability Report, the energy and fuel consumption factors have been derived directly from data and methodologies provided by the Hellenic Ministry of Environment and Energy and DAPEEP. Specifically, the conversion of fuel quantities to energy units and the calculation of Scope 1 GHG emissions utilized the coefficients provided in the National Climate Law (4936/2022) by the Hellenic Ministry of Environment and Energy. For Scope 2 emissions, the conversion of electricity consumption into emissions factors was based on both the residual energy mix of Greece and the residual energy mix of the electricity provider, as published annually by DAPEEP.*

## Energy and emissions aggregated table

	2023	2024
Thermal Energy (MWh)	1,609.80	1,671.35
Electric Energy (MWh)	2,390.20	2,296.23
Total Energy Use (MWh)	4,000	3,967.58
Percentage of energy from renewable sources consumed	22.07%	21.38%
Energy Intensity (MWh / mil €)	21.47	28
Energy produced by RES (MWh)	991.30	1,222.74
Emissions Scope 1 (t CO <sub>2</sub> e)	419.49	431.70
Emissions Scope 2 based on the location (t CO <sub>2</sub> e)	1,194.15	1,147.20
Emissions Scope 2 based on the market (t CO <sub>2</sub> e)	870.03	835.82
Total Emissions based on the location (t CO <sub>2</sub> e)	1,613.64	1,578.90
Total Emissions based on the market (t CO <sub>2</sub> e)	1,289.51	1,267.52
Emission intensity Scope 1 (t CO <sub>2</sub> e/ mil €)	2.25	3.05
Emission intensity Scope 2 based on the location (t CO <sub>2</sub> e/ mil €)	6.41	8.10
Emission intensity Scope 2 based on the market (t CO <sub>2</sub> e/ mil €)	4.67	5.90
Total emissions intensity based on the location (t CO <sub>2</sub> e/ mil €)	8.66	11.14
Total emissions intensity based on the market (t CO <sub>2</sub> e/ mil €)	6.92	8.94

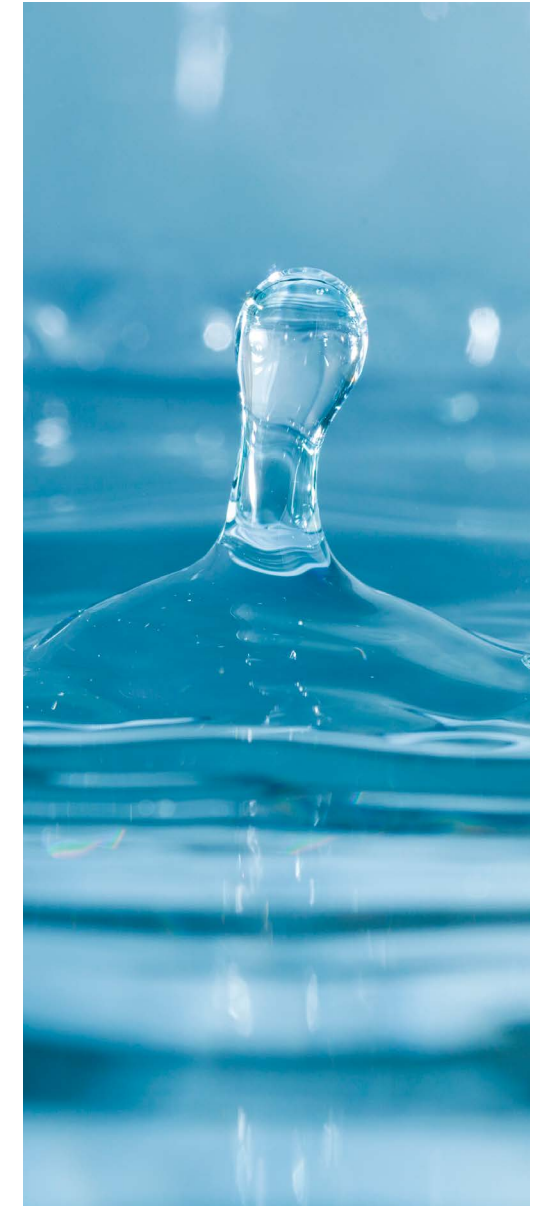
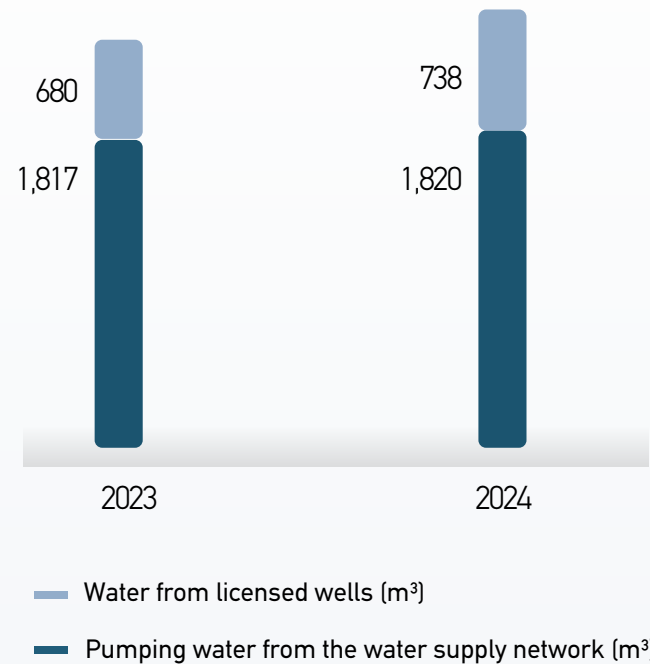
## Water consumption

Despite the fact that metallurgical activity does not necessitate intensive water use, the Company maintains a commitment to responsible water management, operating in full compliance with prevailing legislation.

**2558m<sup>3</sup>**

Water consumption

Water Consumption per Source (m<sup>3</sup>)



## Waste management

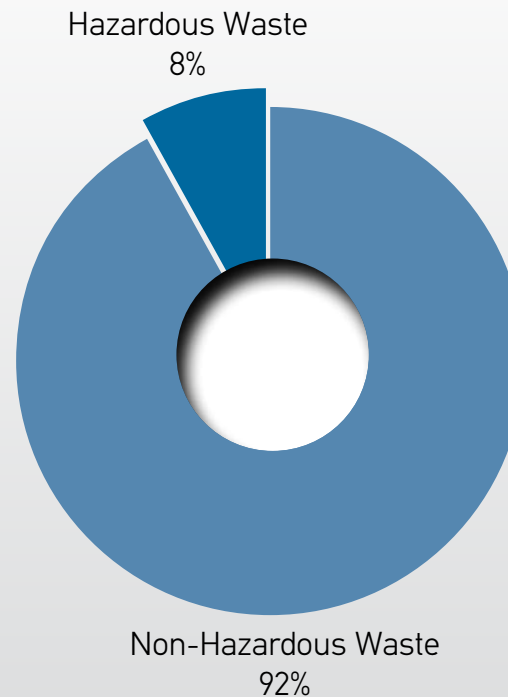
For SIDMA Steel, effective waste management is a critical aspect of environmental responsibility. We are committed to minimizing waste generation, maximizing recovery, and ensuring appropriate disposal. Our waste management policy adheres to all environmental legal requirements and is guided by the principles of prevention and reuse. The solid waste produced by our operations is carefully separated into hazardous streams (e.g., waste from paints and varnishes containing organic solvents, machine oils) and non-hazardous streams (e.g., paper, plastic, metal, and wood).



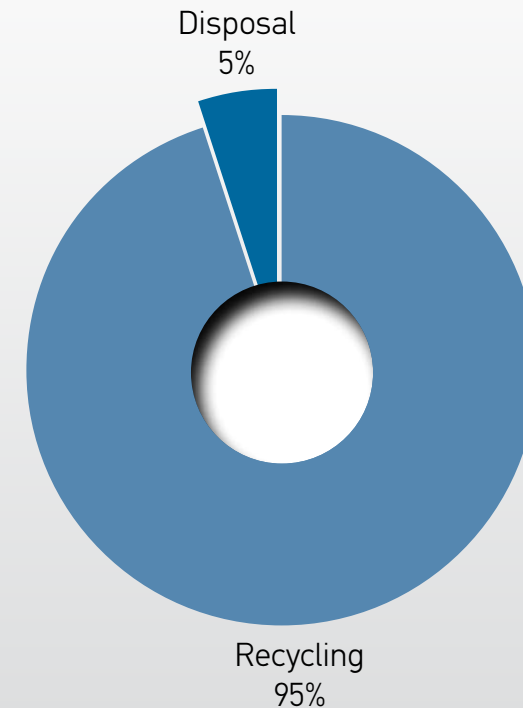
**95%**  
Waste recycling



Waste generated 2024 (tonnes)



Waste management method 2024



In 2024 the waste generated was 103 tonnes of hazardous waste and 1228 tonnes of non-hazardous waste



Management (tonnes)		2023	2024
Hazardous waste	Combustion	-	-
	Landfill	-	-
	Other Disposal Operations	12.51	15.50
	Total Quantity of Hazardous Waste Destined for Disposal	12.51	15.50
	Preparing for Reuse	-	0.27
	Recycling	13.85	87.24
	Other Recovery Operations	-	-
	Total Quantity of Hazardous Waste Diverted from Disposal	13.85	87.51
	Total Hazardous Waste	26.36	103.01
Non-hazardous waste	Combustion	-	-
	Landfill	-	-
	Other Disposal Operations	56.83	55.35
	Total Quantity of Non-Hazardous Waste Destined for Disposal	56.83	55.35
	Preparing for Reuse	-	-
	Recycling	950.48	1,172.98
	Other Recovery Operations	-	-
	Total Quantity of Non-Hazardous Waste Diverted from Disposal	950.48	1,172.98
	Total Non-Hazardous Waste	1,007.31	1,228.33
Total Waste Generated		1,033.67	1,331.34
Percentage of Waste Not Recycled		6.7%	5.3%

# Eco-friendly product design

Proper waste management is a key consideration from the initial design and production stages of products. In recognition of the significance of climate change and the demands of its stakeholders, the Company systematically assesses the conformity of its operations with applicable requirements and undertakes a thorough analysis of the environmental impact associated with its products and services.

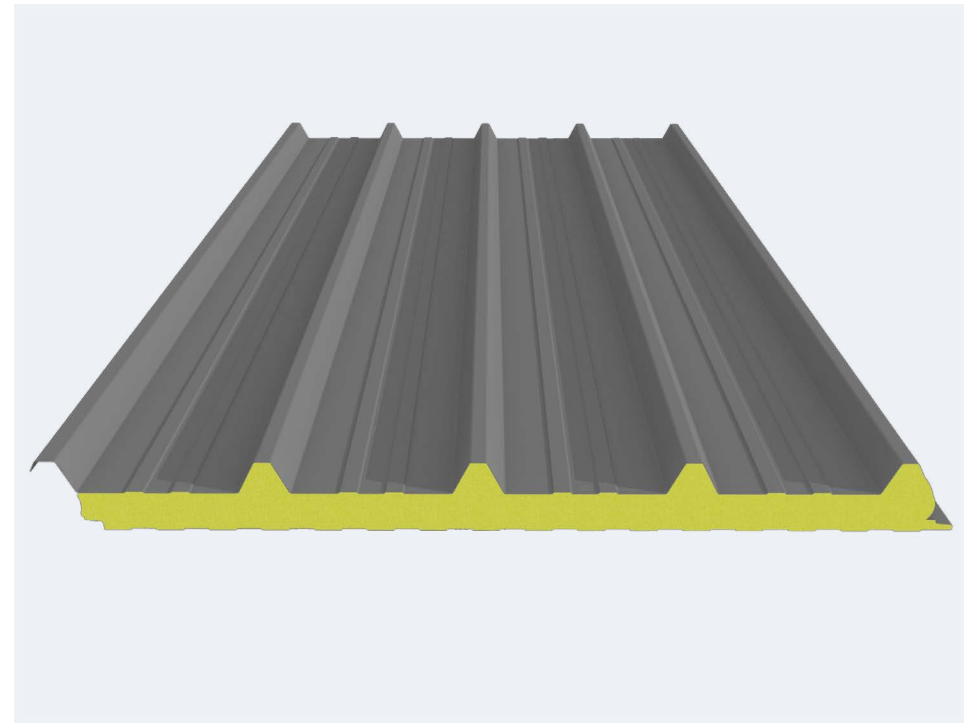
Through the establishment of quality management systems and the acquisition of international certifications, SIDMA Steel operational methods and procedures integrate environmental respect, employee safety, and the fostering of environmental awareness. This approach drives the development of products and services that not only enhance productivity but also actively support environmental protection. In the pursuit of sustainable

development and environmental responsibility, the Company has undertaken the certification of its products against international audit protocols and environmental compliance standards. Reinforcing its environmental position over the preceding two years, the Company has successfully certified its entire range of products with potential environmental implications, adhering to relevant international requirements and standards.

Since November 2023, the Company's membership in the German emission control body GEV enables its products to contribute to LEED, BREEAM, and HQM certified buildings. A significant achievement is the Company's attainment of the highest EMICODE EC1PLUS certification for all its panel types, verifying the lowest possible volatile organic compound emissions and the safe use of its products for both people and

the environment. In addition, the Company has improved its positive footprint by obtaining LCAs and HPDs (they are optionally third party verified HPDs), evaluating

potential environmental impacts throughout the life cycle of the product, from the production of raw materials to its final disposal to the customer.



# Fostering relations of trust with our people **and society**

# 03

# Our approach

At SIDMA Steel, we recognize that our people are the cornerstone of our operations and sustainable development. To this end, we have developed a modern human resources management framework that prioritizes both the professional and personal growth of our employees. We consistently support our team through targeted training and additional benefits, while also expanding our community engagement. We strive to operate responsibly and create value for society by generating employment in our local communities and encouraging the voluntary participation of our employees in awareness-raising initiatives, as well as supporting organizations and institutions that have a vital social impact.



# Our people

Guided by the principles of Respect, Equality, Integrity, and Cooperation, SIDMA Steel prioritizes creating a supportive and inclusive workplace where every employee can develop their skills and grow professionally and personally.

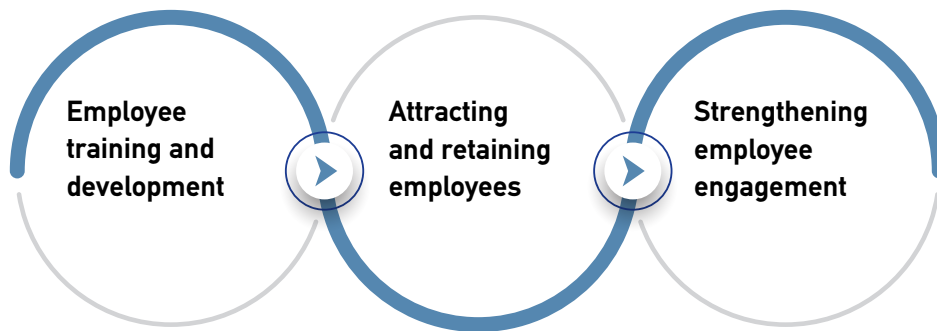
We foster a climate of trust and respect, encouraging collaboration and initiative.







Our aim is to cultivate a culture of trust and confidence that inspires cooperation and mutual support, ultimately attracting and retaining highly skilled and responsible individuals who align with our values and significantly contribute to building a sustainable future.



## Key management pillars

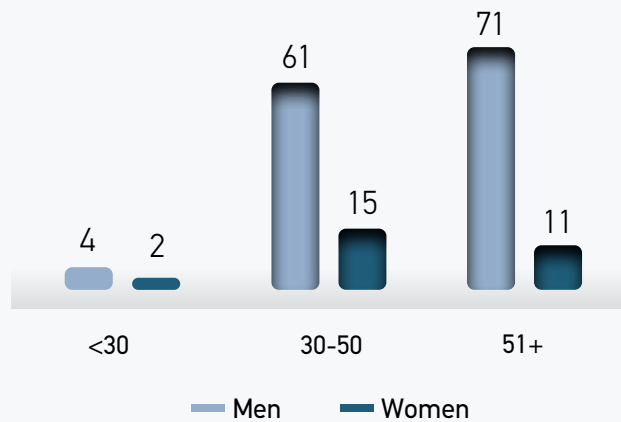
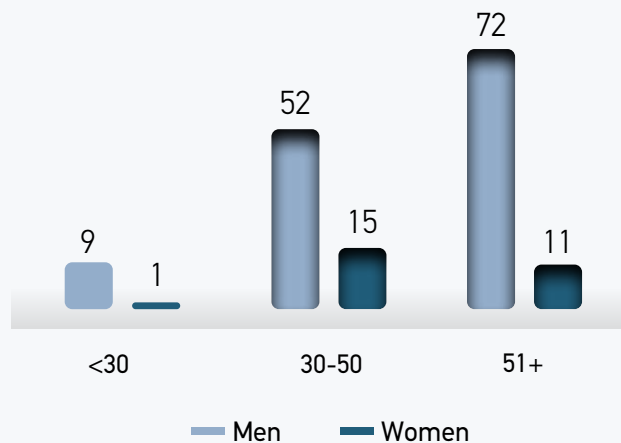
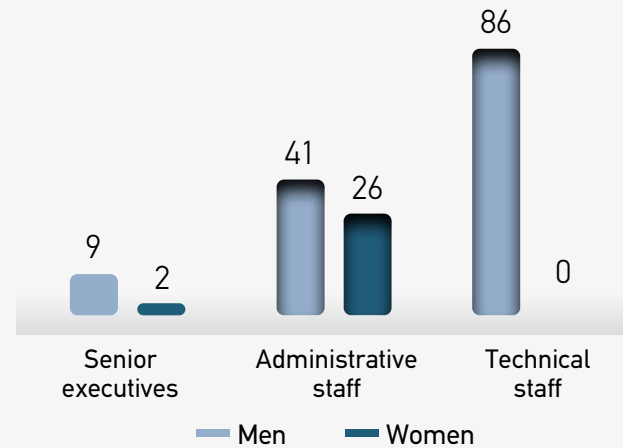
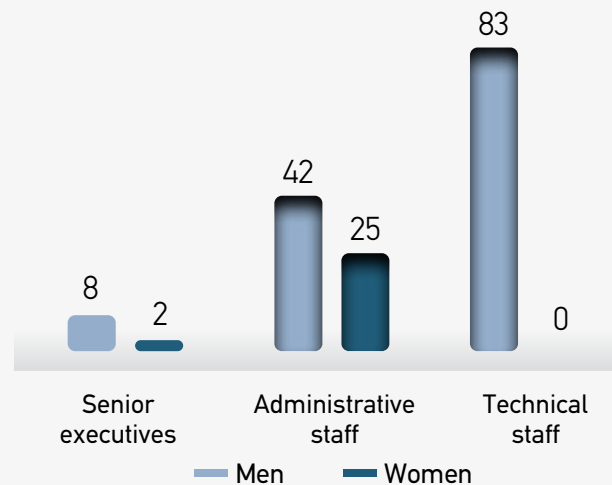
Our approach to managing our human resources is based on the following pillars:



2023	2024
 <b>Men</b> <b>136</b>	 <b>Men</b> <b>133</b>
 <b>Women</b> <b>28</b>	 <b>Women</b> <b>27</b>
 <b>Total</b> <b>164</b>	 <b>Total</b> <b>160</b>

In 2024, the geographical distribution of employees is as follows:



**Employee analysis per gender  
and age 2023****Employee analysis per gender  
and age 2024****Employee analysis per hierarchical level  
and gender 2023****Employee analysis per hierarchical level  
and gender 2024**

To 100% of the  
of our employees  
are employed under  
full-time employment  
contract.



100% of the  
employees are  
covered by  
collective labor  
agreements.

## Cultivating culture of equality and respect

SIDMA Steel is committed to fostering a workplace where fairness, acceptance, and respect are paramount for all employees. We ensure equal opportunities throughout the entire employee lifecycle, encompassing hiring, evaluation, and career development. Discrimination of any kind,

including based on gender, age, ethnicity, religion, or other personal characteristics, is strictly prohibited. We actively promote a work environment free from harassment and unacceptable conduct, and we champion gender equality through equal opportunities and equal pay for every individual.



# Promoting Human Rights



Respecting and defending human rights are fundamental pillars of our operations. We are fully aligned with internationally recognized frameworks, including the United Nations Universal Declaration of Human Rights, the Core Conventions of the International Labor Organization (ILO), the Principles of the UN Global Compact, and the Sustainable Development Goals (SDGs).

In line with the above, we have adopted specific policies, including our Human Rights Policy and our Diversity, Equity, and Inclusion (DE&I) Policy, to ensure these important matters are managed responsibly and with fairness.

Moreover, SIDMA Steel operates in full compliance with child labor prohibition laws, respecting the minimum permissible working age defined by legislation in each country and region where we have a presence.

Our policy explicitly prohibits the employment of anyone under 18 years of age. We maintain

a strong commitment to preventing child labor globally and systematically strive to ensure a responsible, safe, and ethical working environment for all our employees.

In addition to our stance on child labor, SIDMA Steel applies rigorous policies and practices to eradicate all forms of forced or compulsory labor and the phenomenon of human trafficking. We underpin these commitments with proactive preventive measures and comprehensive control procedures, both internally and across our supply chain, ensuring that every facet of our business operations aligns with these ethical principles.

No incidents were recorded  
of human rights violations in 2024.





## Human Rights Policy

SIDMA Steel demonstrates a strong commitment to respecting and defending Human Rights, recognizing their critical importance as a pillar of Sustainable Development for both our company and all our stakeholders.

Our Human Rights Policy establishes a clear and consistent framework aimed at cultivating a culture of respect throughout our Group and across all areas we directly or indirectly influence through our business activities.

Our Policy explicitly expresses our zero tolerance towards all

forms of human rights violations. We commit to refraining from any direct or indirect participation in these violations and to actively avoid cooperating or transacting with third parties who have a demonstrated history or significant indicators of involvement in such practices.

We also aim to foster awareness and active engagement among all our employees, suppliers, and partners to ensure the full respect and safeguarding of human rights throughout our entire business ecosystem, encompassing our subsidiaries.



# A Culture of Diversity and Inclusion

SIDMA Steel recognizes diversity as a vital element in creating a healthy, productive, and collaborative workplace. We are committed to ensuring an environment where all individuals are treated with equal respect, fairness, and dignity, irrespective of gender, age, ethnicity, religion, sexual orientation, or any other characteristic. We cultivate a working environment free from all forms of discrimination and all forms of harassment, offering everyone

equal opportunities for development. We recognize that a diverse workforce and board composition, especially within the Board of Directors, provide invaluable perspectives and enhance our decision-making capabilities. Our aim is to go beyond simply institutionalizing diversity; we are committed to fostering a culture of equality and inclusion by actively raising awareness among all our employees.

## Diversity Policy

This Diversity Policy applies to Management, the Board of Directors, and all Company staff. Its aim is to cultivate awareness and commitment to equality and inclusion, and to underscore the significance of promoting and implementing best

practices regarding diversity, equality, and inclusion at all hierarchical levels. The Policy is communicated to all employees in Greece and abroad via internal channels and to stakeholders through the Company's website.



## Addressing violence and harassment

SIDMA Steel maintains a zero-tolerance stance on bullying, violence, and harassment. We recognize that such behaviors impede workplace equality and are unacceptable in any work environment. These actions violate both legal and ethical standards, as well as the fundamental principles and values of our Company.

Our Company is committed to handling any unacceptable behavior with the utmost seriousness and with unwavering respect for the rights of our employees and stakeholders. Our procedures are specifically designed to prevent and deter such conduct and adhere fully to all applicable labor legislation.

In the event of reported incidents,

we address them transparently and implement appropriate measures in line with our Code of Practice against Violence and Harassment. We ensure that all employees and stakeholders are given the opportunity to be informed of the allegations made against them, to articulate their views, and to appeal any disciplinary decisions without experiencing adverse consequences.

In this context, we have established and rigorously follow our Code of Practice against Violence and Harassment. This Code aims to

› Clearly inform employees about the concepts of "violence" and "harassment", the legal protections available against such behavior, their rights if they experience

it, and the actions to take if they consider themselves victims.

- › Promote the information and education of employees regarding the importance of:
  - the principle of equal treatment between men and women,
  - the prohibition of discrimination on grounds of sex or sexual orientation; and
  - preventing, combating and responding to violence and harassment.
- › Encourage employees to participate and contribute to prevention and response to violence and harassment in the workplace and in the development of a friendly working environment for all employees regardless of

gender or sexual orientation.

- › To promote cooperation between all competent authorities and employees in order to maintain a healthy and safe working environment with particular and constant characteristics of mutual respect, courtesy, respect for each other, and honesty, understanding and mutual support.
- › Provide immediate protection to any employee who believes they are or have been subjected to violence or harassment, and safeguard them from any retaliation for resisting such behavior or reporting it.

The Code is communicated to all relevant parties and is accessible on the corporate website and intranet.

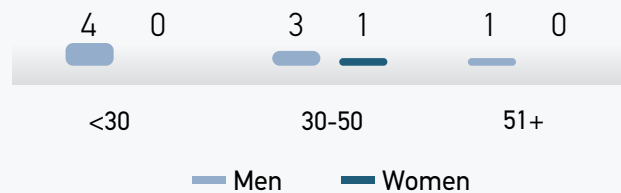
# Attraction and retention

SIDMA Steel prioritizes the attraction of candidates who demonstrate not only the requisite knowledge but also the interpersonal skills necessary for effective integration within our working environment.

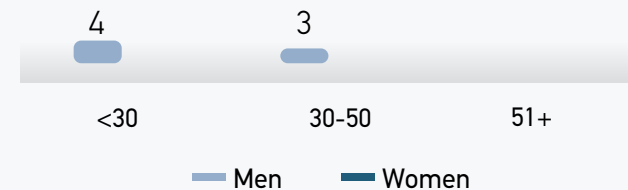
The recruitment process is underpinned by transparency, meritocracy, and the absolute avoidance of discrimination. We are committed to fostering a culture of acceptance wherein diversity enhances creativity and overall performance.

## Recruitment of employees per gender and age

### Recruitment of employees per gender and age 2023

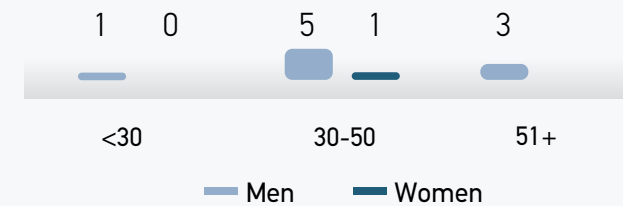


### Recruitment of employees per gender and age 2024

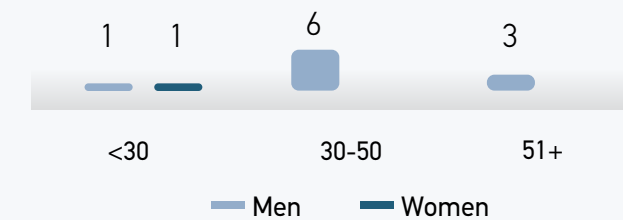


## Departures of employees per gender and age

### Departures of employees per gender and age 2023



### Departures of employees per gender and age 2024



In 2024, the departure rate stood at 6.9%, with voluntary departure rate at 5.6%.



# Strengthening employee engagement

Strengthening employee engagement is crucial for our growth and resilience. To this end, we have established robust communication channels and are implementing a tailored training program focused on seamless integration, comprehensive skill development, and the enhancement of both professional and personal capabilities.

Communication with our employees is considered a critical element in fostering relationships built on mutual trust and respect. To this end, we have established internal communication channels that reinforce commitment and promote meaningful and reciprocal engagement. Through strategic and transparent communication, we seek

to cultivate a cohesive corporate culture and ensure the timely dissemination of information to our employees. Moreover, our open-door policy and grievance mechanism are

designed for the prompt identification and effective resolution of any issues that may arise, and we also conduct regular employee satisfaction surveys.

## Add Value" reward program

Our "Add Value" program encourages employees, individually or in small teams, to submit improvement suggestions for areas such as production, health and safety, and quality, fostering active participation and innovation. Proposals, whether submitted in a sealed envelope or electronically to the Human Resources Department, are evaluated by an Evaluation Committee that includes Management Representatives. Approved suggestions are implemented, and the employee or team that proposed them is recognized with an award.



## Additional benefits

In an effort to reward employees for their contribution, the Company has adopted a benefits framework in addition to those benefits provided for by law, covering a wide range of the needs of both employees and their families. Specifically, we provide:



**Private insurance fully covered by the Company**



**Hospital and outpatient care coverage for our employees' family members**



**Psychological support line for employees and their family members**



**Vouchers**



**Gifts for employees' children upon their enrolment in Higher Education Institutions**



**Christmas events and gifts**



## Enhancing physical and mental health

At SIDMA Steel, the physical and mental health of our people is a substantial investment and a key priority. Working with Ergo well-being, we continuously strengthen the psychological support and emotional empowerment of our employees. Complementing this, our 24-hour Psychological and Counseling Support Line offers a vital resource to all employees and their families. This comprehensive network of care fosters a supportive environment that promotes balance, resilience, and overall well-being.

# Employee training and development

SIDMA Steel makes ongoing investments in the support, development, and comprehensive onboarding of our employees, alongside their individual growth. We firmly believe that creating opportunities for our people to expand their skills, enrich their knowledge, and feel valued directly contributes to the Company's success. Specifically:

- › We have established a unified and structured training program that applies to all personnel, from new recruits to senior management. This program provides the requisite tools and support to facilitate smooth integration and a comprehensive understanding of our organizational culture.
- › We implement targeted training for executives and Board members to keep them up to date on current trends, requirements and best practices in corporate governance.
- › We create flexible, modern learning programs that support development at every stage of a career and enhance both professional and personal skills.

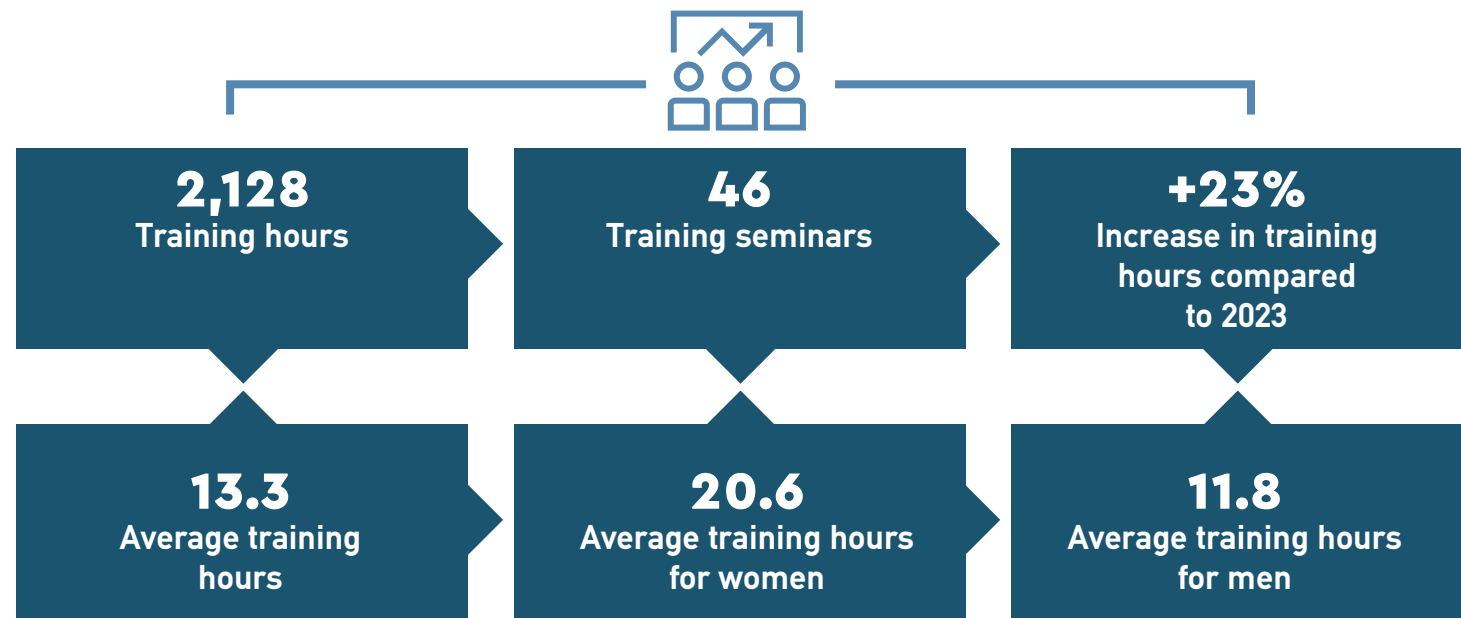
## Induction Training

To ensure a smooth and rapid integration into our working environment, new employees participate in induction training. This comprehensive program informs them about Company operations, prepares them for successful job performance, and facilitates

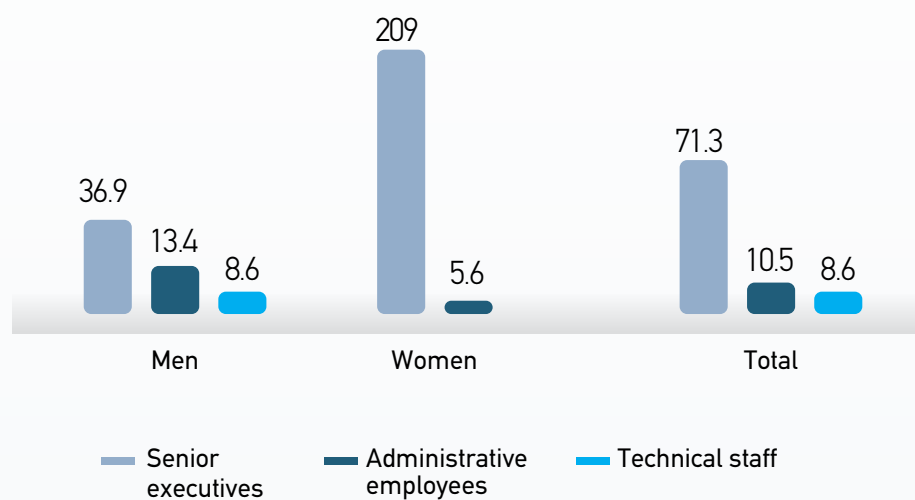
introductions to their future colleagues. In particular, induction training includes

- › Information about the Company, its structure, organization, products, markets served, as well as communication channels between management and employees

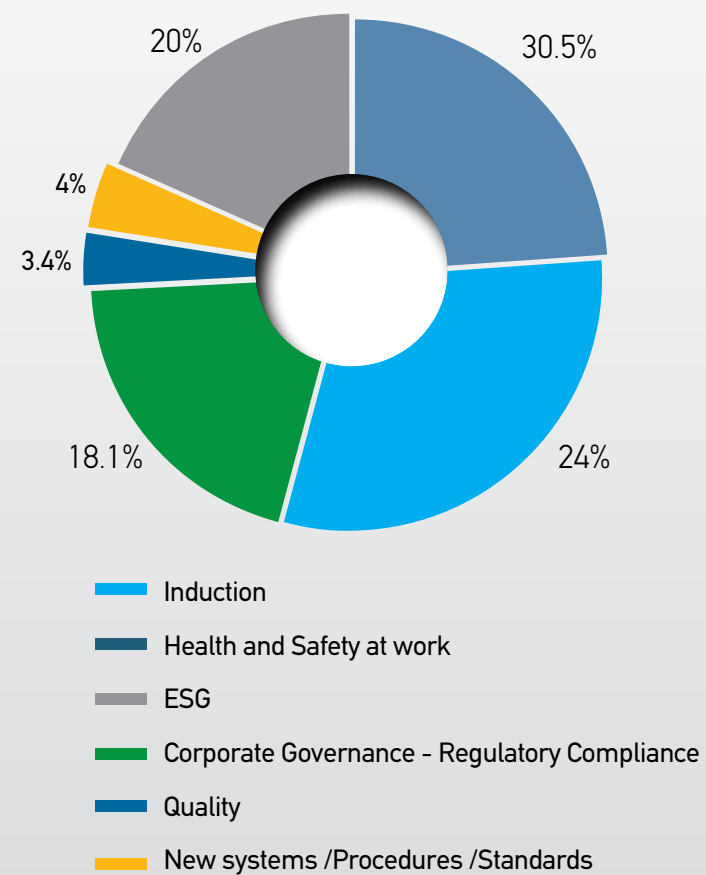
- › Briefing on the values and vision of the Company
- › Training on the requirements of the job and the necessary protective equipment
- › Presentation of Company regulations and policies



Average training hours per gender and hierarchical level 2024



Training topics (%)







## Employee Satisfaction Survey

The Employee Satisfaction Survey is conducted to assess the level of employee satisfaction, reinforce employee commitment, and identify issues requiring attention to improve communication and decision-making processes.

Through the survey, employees were given the opportunity to express their views and concerns. In 2024, 98 employees participated in the survey, with a satisfaction rate of 89%, which highlighted areas for improvement.

## Employee Evaluation

Recognizing the significance of evaluation for the continuous development and professional advancement of our employees, we implemented a performance evaluation system in 2024. This system was presented and discussed with the designated evaluators, and an informative briefing was conducted for all staff members. The Performance Evaluation form is completed jointly by the employee's direct supervisor and the indirect supervisor. Subsequent to completion, a face-to-face meeting is

held with each appraisee to facilitate a discussion, where the strengths of each appraisee are discussed as well as the points that need improvement and action/improvement plans are agreed.

The annual performance evaluation, held at the end of each year, focuses on providing employees with relevant feedback on their contribution to the Company, pinpointing their strengths, and identifying areas for growth. In 2024, we achieved 100% employee evaluation.

# Cultivating a health and safety culture

At SIDMA Steel, Occupational Health and Safety of our people - employees and partners - is not just an obligation, but an integral part of our daily operation and strategy. The Company recognizes its own responsibility and is committed to ensuring the right to a healthy and safe workplace both for its employees and for the employees of independent contractors operating on its premises, while at the same time it seeks to continuously improve the Health and Safety conditions in its facilities. In order to achieve its goal of "No incidents or near-misses at work", SIDMA Steel has adopted and implements a Health and Safety System, constantly assessing potential risks.

At the same time, SIDMA Steel regularly organizes information and training actions for its employees.

It organizes special workshops and seminars in order to raise awareness on health and safety issues, so that every employee is able to recognize potential risks and operate responsibly. Simultaneously, it has set specific monitoring indicators to help assess progress and identify areas for improvement at an early stage.

The Company's approach is based on the regular identification and management of risks in order to eliminate occupational risks. In this context, SIDMA Steel has adopted an Occupational Health and Safety Policy, which is part of the integrated Quality, Occupational Health & Safety Management System that responds to its needs and priorities and is aligned with the requirements of ISO 45001:2018.

Our framework for managing workplace health and safety aims to:

**Identify in a timely manner and assess any risks to workplace Health and Safety**

**Adopt new procedures - as applicable - and implement targeted actions to strengthen our Company's safety culture, utilizing the inspections we carry out.**

**Properly inform and educate our employees on issues of safe workplace conduct.**



## Occupational Health and Safety Policy

The Occupational Health and Safety Policy aims to provide a safe working environment for the Company's employees and to promote a culture of safety in the workplace. This approach aims to manage safety as a collective and primary responsibility of all employees and partners and is integrated into every aspect of the Company's operations and business activities. Occupational Health and Safety being a key priority, SIDMA Steel, through its H&S Policy, is committed to the timely identification, assessment and implementation of preventive and corrective measures

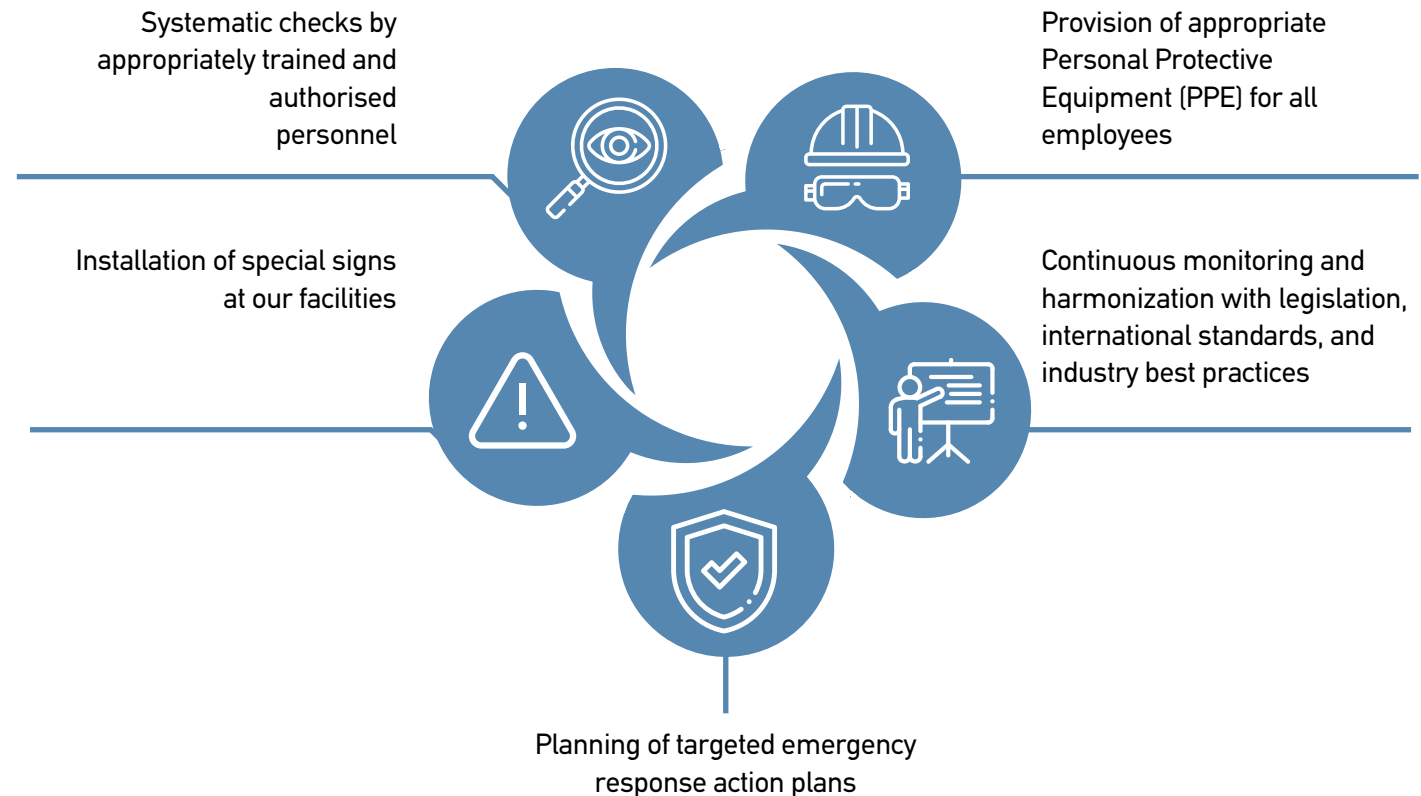
regarding potential hazards, in full compliance with applicable legislation and other requirements. In addition, it is committed to promptly reporting and investigating any incident - whether it is an incident or near miss or unsafe practice. Continuous training is considered equally important so that everyone is informed and trained to respond safely to any incident. We encourage active participation and open communication to enhance transparency and cooperation around occupational health and safety issues.

## Health and Safety System

At SIDMA Steel, prevention and safety are a common concern for everyone. Based on an integrated System, the Company has developed an organized plan for risk identification and management, risk assessment, and the investigation of any incident, whether it is an incident or a near-miss, with the participation of employees and Management.

The System focuses on timely handling when an incident occurs, but also on analyzing the causes and planning corrective actions and preventive measures. Through this continuous feedback process, SIDMA is constantly evolving its practices and enhancing the feeling of safety in its workplaces.

Our System features a number of procedures among others:





## Health and Safety Risk Assessment

At SIDMA Steel, we place particular emphasis on the prevention and early identification of occupational risks. In order to identify potential risks and determine the appropriate control measures, we carry out regular risk assessments for the various processes and activities. Corrective actions are taken immediately where necessary, ensuring a safe and healthy working environment.

To reliably assess risks, data from past incidents, near-miss reports, incident analyses and the findings of internal and external inspections are used.

At the same time, the Company fully complies with the relevant Greek and European legislation and enhances the process through consultation with its employees, so that decisions are made on the basis of experience and real needs.

The Written Occupational Risk Assessment (WORA) is a key tool in the Company's effort to regularly monitor and assess the risks that may arise in the workplace. This assessment is carried out for each workplace and facility, following the prescribed procedures to cover all relevant requirements.

Each WORA shall be updated whenever changes or modifications to the equipment occur and reviewed as part of the annual review of the Health and Safety Management System, ensuring continued compliance and effective risk prevention.

The risk categories we have identified are divided into:

**Direct or indirect accident-related risks** that could potentially cause an accident.

**Non-accident risks** which are associated with organizational, psychological, and ergonomic factors. While these factors do not necessarily have the potential to cause an accident, they nevertheless affect the short- or long-term mental and physical health of employees.

€88,536

Investments in Health and  
Safety for 2024



## Incident management

The Safety Technician and Occupational Physician are informed of any incident, regardless of severity. This is followed by an investigation into the incident and the conditions under

which it occurred to identify the causes and possible contributing factors. The results of the investigation are recorded in an Emergency Analysis Form, for the purpose of informing

Management and our Human Resources Department and planning any required corrective measures to prevent similar incidents going forward.

The basic stages of the incident management process are described below:



## Health and Safety Officers

Prevention is a key principle of the Company's Health and Safety philosophy. The Safety Technician of each facility is responsible for preventing accidents and enhancing safety in the workplace through inspections, audits and compliance with the necessary measures. On the other hand, the Occupational Physician is responsible for protecting and monitoring the health of employees, focusing on preventing occupational diseases, providing advice on health issues and raising awareness among employees. Through their role, both are instrumental in creating a safe and healthy working environment.

# Employee information and awareness-raising

Fostering a culture of safety is an ongoing priority and a key element of the Company's daily operations, which consistently invests in raising awareness among all employees, encouraging their participation through dialogue and exchange of views and experiences.

For this reason, regular training is carried out, both internally and in cooperation with external providers, so that all employees are fully informed and properly prepared to identify and effectively manage any potential risks or situations that may arise in the workplace. We place particular emphasis on informing new employees to ensure that they are aware of the basic principles of occupational health and safety from day one.

In particular, employees in the production, maintenance and logistics departments receive training from their line manager and the Safety Technician in the safe use of equipment and machinery, as well as in the correct application of personal protective equipment. Before they start work, the head of each department shall ensure that they are informed in detail of the specific risks of their position, in accordance with the provisions of the relevant Occupational Risk Assessment Study.

In 2024, 15 seminars on Health and Safety issues were held, which were attended by all the Company's employees.

## Safety Month

In recent years, SIDMA Steel has organized a "Safety Month" for all our units, enabling our employees to participate in training programs and informational seminars on targeted health and safety issues.

**125**  
employees trained  
in 2023



**151**  
employees trained  
in 2024

**648**  
Total Health & Safety training  
hours in 2024



## First aid training

On the occasion of World Restart a Heart Day and this year's message "Two hands can save a life", SIDMA Steel highlighted the importance of training all employees in Cardiopulmonary

Resuscitation (CPR) and First Aid. The Company used this symbolic day to reinforce the culture of prevention, as well as to raise awareness on health and safety issues.



## Good health and safety practices

SIDMA Steel is organizing a Photo Contest on "Health and Safety at Work, Good Practices - Zero Accidents", in order to highlight the importance of prevention and awareness of safety issues in the workplace. The objective is to portray through the participants' cameras good practices and

everyday moments that contribute to the creation of a healthy and safe working environment, promoting the message that a world without accidents at work is possible. The competition reinforces the collective effort to foster a culture of prevention and the continuous pursuit of the "Zero Accidents" objective.



## Setting Targets for Improvement

Continuous improvement in Health and Safety is a daily commitment for the Company. In addition to the long-term goal of zero accidents, it sets specific Progress Targets that helps with monitoring performance and planning targeted actions. These targets are formulated based on the Company's needs, the requirements of legislation and the provisions of international standards, thus ensuring an integrated approach to prevention and protection.

Part of this strategy is the implementation of an organized program of internal and external inspections, both on a regular and extraordinary basis. Through these inspections, risks in the

workplace are identified and assessed, compliance with safety rules by employees and partners is examined, orderliness is ensured, fire safety measures are checked, and the implementation of internal policies, procedures and instructions is confirmed.

Inspections are carried out either by the Directors of the Company's departments in cooperation with the Safety Technician or the Occupational Physician, or by external partners. All findings are recorded in reports, which are incorporated into the Health and Safety Management System and are accompanied by specific action plans to correct or improve identified issues.



# Health and safety **performance indicators**

The Company monitors and records its Health and Safety performance in a consistent and continuous manner in order to achieve continuous improvement and zero accidents and incidents. The table below shows the performance for 2023 and 2024.

	2023	2024
<b>FREQUENCY RATE</b>		
LTIFR (Lost Time Injury Frequency Rate) of employees	2.9	5.8
LTIFR (Lost Time Injury Frequency Rate) of subcontractors	0	0
<b>INCIDENT SEVERITY RATE</b>		
LTISR (Lost Time Incidents Severity Rate) of employees	0	425.1
<b>ABSENTEEISM RATE</b>		
Employee Absenteeism Rate (AR)	1.09%	1.84%
<b>INCIDENTS</b>		
Number of employee-involved accidents	1	2
<b>NUMBER OF OCCUPATIONAL ILLNESSES</b>		
Number of occupational illnesses among employees	0	0

\* *Lost Time Incident Rate (LTIR): (Number of incidents with absence from full-time work / man-hours worked) x10<sup>6</sup>*

*LTISR (Lost Time Incidents Severity Rate) (Number of days of absence from work due to an accident / man-hours worked) x10<sup>6</sup>*

*Absenteeism Rate (AR): (Number of days of absence from work due to any inability / man-days of work) %*

Responsibility and commitment to society is a key part of the Company's approach to Sustainability. The Company's social contribution aims to support the communities where it operates, with an emphasis on supporting vulnerable social groups through initiatives and volunteering.

Key contributors to the social engagement and aid effort are the Company's employees, who participate and support any action, while at the same time fostering teamwork and cooperation among themselves.

## Our social contribution

Our social contribution is based on 3 key strategic pillars, while we seek to continuously expand our contribution to meet the conditions and needs of today's world.



**Employee  
volunteering**



**Supporting  
vulnerable social  
groups**



**Supporting  
innovation**



# Employee **volunteering**



We achieve positive social impact through responsible partnerships with local institutions and NGOs, as well as through the participation of our employee volunteers in social projects.

Through volunteering, we strengthen sustainability and relationships with the local communities in which we operate, increasing social well-being and reducing inequalities.

## Painting a school

SIDMA Steel in collaboration with the 3rd Primary School of Aspropyrgos was selected together with the UrbanAct Team to renovate the walls of the school,

sending out positive messages. This project was accomplished with the help of artists, creating a pleasant learning space full of imagination and creativity.



**BEFORE**  
**8.5.2024**



**AFTER**  
**11.5.2024**



## SIDMA Running Team

In 2024, the dynamic Sidma Running Team of SIDMA Steel was present in many races and in the Athens Marathon and Half Marathon. The goal of the Company's employees' participation was not only the benefits of sport, but also the awareness-raising and support of vulnerable social groups.



In particular, the Company participated:

- › in the 10th Charity Mountain Race "Elpida Autism" in Thessaloniki
- › in the mountain running races "12th Hortiatis Trail Run" 12 km and 23 km in the forest of Hortiatis, where the proceeds of the event (registrations) were donated to support the "Hellenic Children's Village" in Filiro, which is home to abused children
- › in the 10 km Alexandrio race
- › in the 16 km and 10 km races in the suburban forest of Thessaloniki, Sheih Sou
- › in the 22nd Half Marathon "Aktios Dromos", held in Vonitsa and
- › in the Lamia Night Run 2024.





## Tree planting initiative in partnership with "We4all"

We participated in a tree planting initiative we organized with We4all, during which 200 trees were planted. This action not only creates a sense of cooperation and teamwork among employees, but also informs and raises awareness for the protection of the environment and forests, while having a positive environmental and ecological impact.



## Supporting vulnerable groups

We actively support organisations and institutions that help vulnerable social groups, creating a positive social footprint through the provision of goods, services and financial support to people in need.

### Supporting the Smile of the Child

During the Christmas period, along with our employees, we donated essentials such as baby and personal care items, toys, and stationery, with a deep sense of solidarity and love for the children hosted by the "Smile of the Child". In addition, we covered the cost of transportation for the treatments of the children living at the House in Melissia, Attica.



# Supporting innovation

Innovation and technology are two fields that can make a major contribution to reducing social problems and finding practical solutions, especially for people in need. We partner with universities to promote innovation and technology.

## Sponsoring the HERMES Research Student Team of the University of Thessaly



The HERMES Student Research Team was created in 2018 by students of the University of Thessaly and the International University of Greece, while today it has been reconstituted and is composed entirely of students of the

University of Thessaly. We contributed to the valuable work of the Team as sponsors in creating a fully functional robotic exoskeleton to assist people with Spinal Cord Injury (SCI). This system will assist persons with paraplegia

in meeting their daily needs with a high degree of autonomy, improving both their mental and physical health. At the same time, we supported the team's participation in the international CYBATHLON competition in October 2024.



# Additional Actions

In addition, we support young people in their first stages of their academic careers and raise awareness on contemporary social issues.

## Graduates of Higher Education Institutions

Every year, SIDMA Steel rewards students who have been admitted to Higher Education Institutions by offering them a gift voucher from a well-known tech equipment chain. In 2024, we rewarded 5 girls who got admitted to various Universities in Greece.

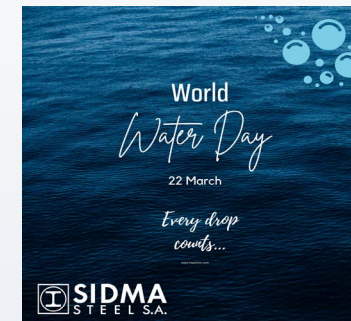


## World days

Through social media posts, newsletters and press releases, we support the World Days by informing and raising awareness about the importance of each one.

For 2024 in particular, SIDMA Steel has posted on social media for the following:

- International Day for Biological Diversity
- World Day for Safety and Health at Workplace
- International Women's Day
- World Environment Day
- Greek National Holidays of March 25th and October 28th
- Global Recycling Day
- World Cancer Day
- International Day for the Elimination of Violence Against Women
- Father's Day
- World Mental Health Day



# corporate governance

# 04







## Our approach

Corporate governance is the foundation of SIDMA Steel operation and long-term sustainability. The Group, with responsibility and commitment to the principles of accountability and transparency, is building a strong governance framework that enhances the confidence of its shareholders, employees, and all its

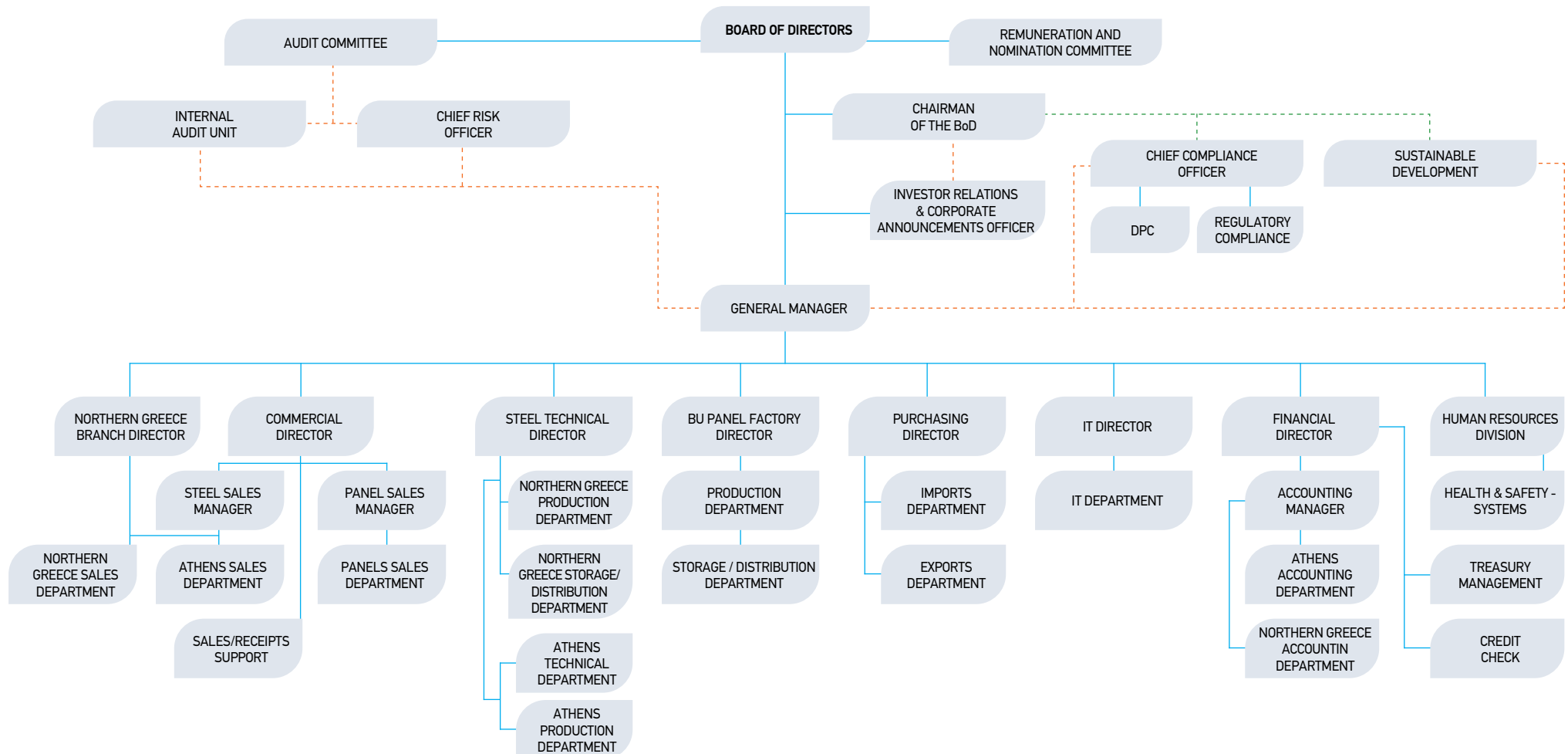
stakeholders. Through structures and processes that ensure compliance with the applicable institutional framework, as well as the adoption of best practices, SIDMA Steel invests on an ongoing basis in ethical entrepreneurship and in building a strong governance system.



# Organisational Chart

The organisational chart of SIDMA Steel depicts the management structure and the structure of the Company's key functions, contributing to effective governance. The Company's clear hierarchy and defined roles ensure the smooth and effective flow of information, accountability and alignment of the Company's actions with the broader sustainable development strategy. In addition, the organisational chart enhances accountable decision-making, promotes collaboration between individual departments and the achievement of the Sustainable Development Goals (SDGs) across the 3 pillars of the ESG. The organisational structure of SIDMA Steel is reflected as follows:

ORGANISATION CHART (WITHOUT APPOINTMENT OF CEO)





## Board of Directors

The Board of Directors plays an essential role in shaping the strategy for SIDMA Steel. As the Company's supreme management body, the Board of Directors ensures accountability, transparency and alignment of business objectives with the principles of sustainable development. At the same time, it provides guidance and makes a decisive contribution to strengthening responsible corporate behavior, effective risk assessment and the integration of ESG parameters into the decision-making process.

SIDMA Steel is governed by a 10-member Board of Directors, elected by the General Assembly of

Shareholders. The Board of Directors represents the Company and is competent to decide on any act concerning the management of the Company, the management of its assets and the overall purpose of the Company for all matters which, according to the Articles of Association, are not within the competence of the General Meeting.

The Board of Directors consists of executive, non-executive and independent non-executive members. The status of the members of the Board of Directors as executive or non-executive shall be determined by the Board of Directors.

The composition of the members of the Board of Directors is presented in the following Table:

Name and Surname	Title	Executive / Non-executive member	Independent member
ANTONIS KARADELOGLOU	Chairman of the BoD	Executive member	
PISANTE VICTOR ANDREA	Vice Chairman	Non-executive member	
NIKOLAOS MARIOU	Member	Non-executive member	
STAVROS GATOPOULOS	Member	Non-executive member	
MICHAEL SAMONAS	Member	Executive member	
PANAGIOTIS KONSTANTINOU	Member	Non-executive member	
LIDA BITROU	Member	Non-executive member	
EFSTATHIA SALAKA	Member	Non-executive member	Independent member
VASILEIA MANOLI	Member	Non-executive member	Independent member
SOTIRIOS VARDARAMATOS	Member	Non-executive member	Independent member



**30%**  
of the members  
of the Board of  
Directors are women



**80%**  
of the members  
of the Board of Directors  
are non-executive



**30%**  
of the members  
of the Board of Directors  
are independent  
non-executive

# Business Model

The business model of SIDMA Steel clearly reflects the way in which the Company creates and offers value. The illustration below helps to understand the context within which SIDMA Steel operates, to identify opportunities and to assist in the decision-making process.



# Business principles

SIDMA Steel, from the beginning of its operation, has been driven by the notion that a company can be competitive and efficient and at the same time operate in a principled and socially responsible manner.

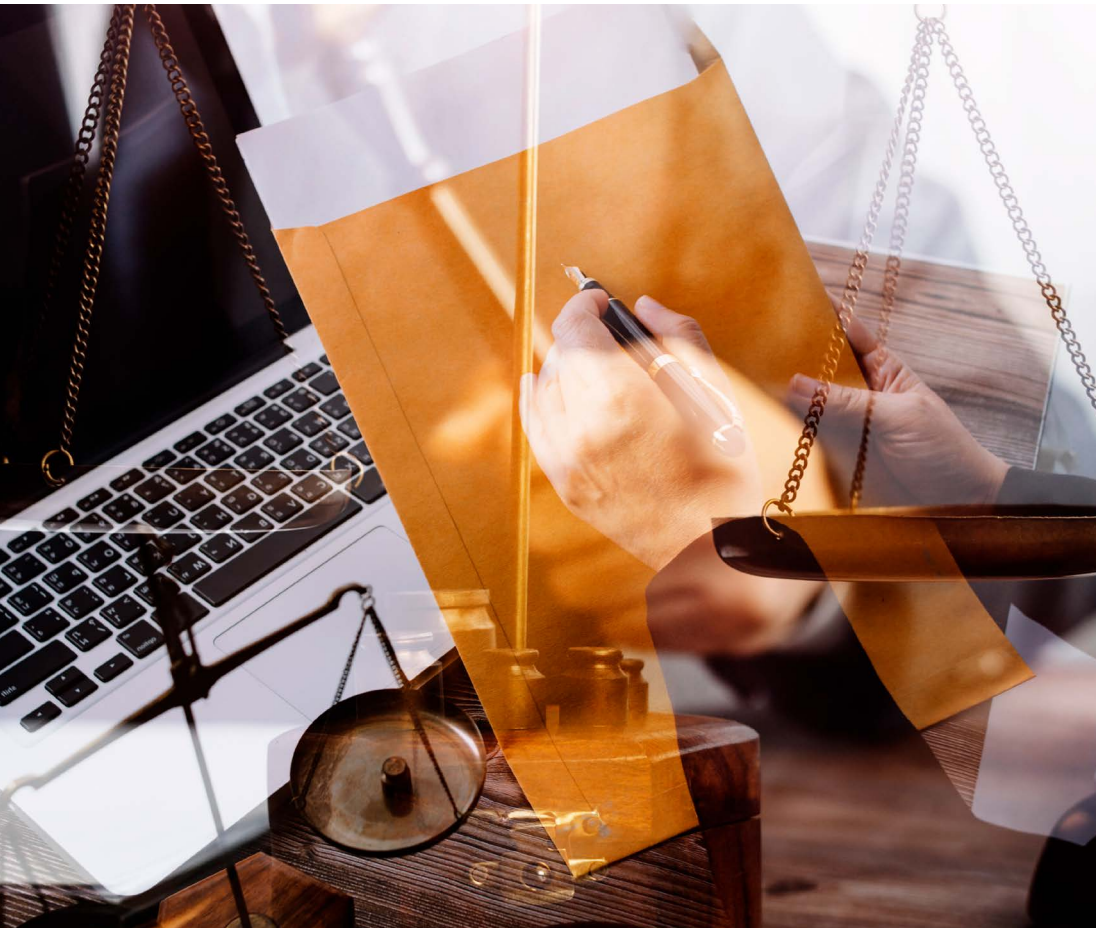
This concept defines the Company's responsibilities towards all those affected by its business activities. Its commitment to principles and social responsibility is confirmed on a daily basis through everyone's conduct

and is crucial to its continued progress. Management is committed to informing all employees, partners and suppliers of the Group about the principles governing its operations.

The Group's operations in relation to each of its associate groups fall within the following framework:

				
<p>› <b>Shareholders:</b></p> <p>The Group seeks to protect the investment of its shareholders and to ensure a satisfactory return on their capital under full transparency.</p>	<p>› <b>Customers:</b></p> <p>The Group is committed to providing quality products &amp; services, on competitive terms, that meet the needs of its customers.</p>	<p>› <b>Employees:</b></p> <p>The Group recognises that its people are its power. Respecting their rights, ensuring good and safe working conditions without discrimination and their development is a prerequisite for achieving its corporate goals.</p>	<p>› <b>Business Partners:</b></p> <p>The Group believes in mutually beneficial partnerships with its suppliers of products and services, as well as with the contractors with whom it collaborates, and is committed to adhering to the Code of Conduct that they should also adhere to.</p>	<p>› <b>Society:</b></p> <p>The Group acts as a responsible corporate citizen and contributes to the well-being and progress of society as a whole.</p>





## Code of Conduct and Business Ethics

The Code of Conduct and Business Ethics we have adopted encompasses the fundamental principles, rules and values that constitute the framework for our activities and determines the day-to-day conduct and practice of the Group. The Code of Conduct and Business Ethics of SIDMA Steel is based on the 10 principles of the United Nations Global Compact, according to which the Group's operations must at least meet its fundamental responsibilities in terms of human rights, working conditions, environmental protection and

combating corruption. At the same time, SIDMA Steel takes into account the OECD Guidelines, which are non-binding principles and standards for responsible business conduct, ensuring that its activities are in line with government policies, strengthening the basis of mutual trust between the Group and the communities in which it operates and contributing to improving the international investment climate and enhancing the Company's contribution to sustainable development.

# Anti-Corruption & Bribery

Corruption and bribery are forms of illegal and unethical conduct that can undermine institutional integrity, good governance and jeopardise the proper functioning of the

Company. SIDMA Steel approach is clear and explicit, through its zero-tolerance approach to any incident of corruption or bribery. The Company applies an Anti-Bribery Policy,

which is binding for the members of the Board of Directors, executives, employees, customers, suppliers, as well as anyone providing services to SIDMA Steel and any

third party acting on its behalf, creating a framework of obligations and guidelines for the prevention, deterrence and combating of bribery.

The Group's key priority and our ongoing concern is to maintain a culture of integrity, transparency and compliance, in full alignment with our principles and values. Adherence to the Group's Code of Conduct & Business Ethics - regardless of sector and hierarchical level - is a prerequisite for the healthy development of the Group and is the responsibility of all of us.



The amount of monetary losses as a result of business ethics violations was €0

In 2024 there were no incidents of legal action or financial sanctions for anti-competitive conduct, corruption or bribery issues

**INTERNAL CONTROL SYSTEM**  
Implementation of a comprehensive Internal Control System (ICS) in the Group, in accordance with international standards and the applicable regulatory framework.



**COMMUNICATION CHANNEL**

Establishment of a communication channel whereby employees, customers, suppliers and any third party can report anonymously or publicly possible code violations or seek advice.

**ESTABLISHMENT OF CODE OF CONDUCT & BUSINESS ETHICS**

Establishment of a Code of Conduct and Business Ethics, which will help to further promote ethical integrity, honesty, transparency and good professional conduct at all levels of the Company's hierarchy, in order to promote the standards required by modern corporate governance.

## Focusing on transparency and accountability

SIDMA Steel recognizes the importance of good corporate governance, placing particular emphasis on a system aimed at the consistent implementation of the Group's strategy, the identification of risks arising from its operation and strict compliance with laws, rules and internal policies.

The Company adopts and implements the Hellenic Corporate Governance Code (HCGC), seeking transparency in communication with shareholders, executives, employees, partners, contractors and suppliers and the seamless and continuous information of the investing public.



## Remuneration and Nomination Committee

The Remuneration and Nomination Committee is a unified committee, which is responsible for the identification of suitable candidates for Board membership and for making recommendations to the Board of Directors. The Committee is responsible for formulating and monitoring the implementation and

regular review of the Company's Remuneration Policy, taking into account the long-term interests of shareholders, investors and employees, as well as the public interest. It is also responsible for defining the selection criteria and procedures for the appointment of the members of the Board of

Directors, regularly assessing the size and composition of the Board of Directors, and submitting proposals to the Board of Directors for its consideration regarding the desired profile of the members. In addition, it shall assess the existing balance of qualifications, knowledge and experience on the

Board of Directors, and based on this assessment, a clear description of the role and competencies required to fill vacancies shall be provided. The Committee shall have the same responsibility with the necessary changes having been made, for key senior managers.

# Suitability & Reliability Policy

SIDMA Steel has established a Suitability and Reliability Policy for the members of the Board of Directors. The purpose of the Policy is to ensure the quality staffing, efficient operation and fulfilment of the role of the Board of Directors of the Company, based on the overall strategy and medium-term business objectives of the Company, in order

to promote the corporate interest. At the same time, through its implementation, it ensures the acquisition and retention of employees with competence, knowledge, skills, experience, independence of judgement, integrity and good reputation - criteria that ensure good governance and effective management for the benefit

of the Company, its shareholders and all stakeholders. The Policy includes the set of principles and criteria applied in the selection, replacement and renewal of the term of office of the members of the Board of Directors, the framework for assessing their individual and collective suitability, as well as the diversity criteria taken

into account in the selection of the members of the Board of Directors. In formulating the Policy, the General Corporate Governance Framework applied by the Company, its corporate culture, its risk appetite, the size, internal organisation, nature, scale and complexity of the Company's activities have been taken into account.

# Remuneration Policy



The Company has established a Remuneration Policy in order to enhance its long-term financial value and to protect the general corporate interest, serving the business strategy in combination with the risk taking policies. The effectiveness of the Policy, is vested in the Company's Board of Directors under the supervision of the Remuneration

and Nomination Committee. The purpose of the Policy is to maximise the value of the Company by supporting a culture of continuous improvement, development and high performance and commitment to the achievement of the objectives and interests of stakeholders and covering all Executive and Non-Executive Members of the Board of

Directors and Senior Management. The basic principles on which the Remuneration Policy is based are the range of duties, powers and responsibilities of individuals, their contribution to the improvement of the Company's efficiency, the prevention of taking increased business risks, and the avoidance of conflict of interest.



# Internal Control **System** (ICS)

In accordance with the applicable regulatory framework, we implement an Internal Control System (ICS) that consists of control mechanisms and audit procedures that cover all the Company's activities, ensuring its effective and safe operation.

The Internal Control System of SIDMA Steel ensures the following:

Consistent implementation of the business strategy with efficient use of available resources of SIDMA Steel

The identification, assessment and management of all risks that may arise from SIDMA Steel operations

Completeness and reliability of the data and information required for the accurate and timely identification of the SIDMA Steel financial condition and the preparation of reliable financial statements

Compliance with the applicable legal and regulatory framework, as well as with the internal policies, procedures and the Code of Conduct of SIDMA Steel, in order to prevent and avoid actions that may damage the reputation or interests of the Company, its shareholders and its partners

Effective operation of IT systems to support SIDMA Steel business strategy and the safe transfer, processing, and storage of vital operational data

The goal of the Internal Control System is to continuously monitor and control the activities of SIDMA Steel, together with the advisory support of the Management, in order to ensure the smooth and efficient operation and the achievement of the Company's strategic objectives.

The adequacy assessment of the ICS is carried out on the basis of best international practices, in order to ensure that the relevant requirements of the ICS are met, by an independent body within the timeframes provided for by the legislation or whenever requested

by the Board of Directors or the competent supervisory authority. The assessment procedure of the ICS, which also includes the individual stages of selection of the candidates who will perform the assessment, is supervised by the Audit Committee, which proposes and commissions

the evaluation of the ICS and monitors the implementation and compliance with the agreed project.

This evaluation shall be carried out by individuals who have proven relevant professional experience and are not dependent on the Company.



## Regular evaluation of the corporate governance system

SIDMA Steel applies a Regular Evaluation System of the corporate governance system that aims to:

- Identify and describe, in a clear and precise manner, all of the provisions where the Company applies the Hellenic Corporate Governance Code (HCGC)
- Evaluate the adequacy of disclosure to all Company positions and employees involved in corporate governance activities and what is required by the HCGC in an understandable manner
- Set out and document the reasons for any exceptions
- Carefully assess the risk of deviation and the measures taken to minimise any risks arising from exceptions to the application of the HCGC
- Select compliance methods that are transparent and aimed at effective and high-quality good governance
- Evaluate the corporate governance statement prepared by the Company containing the disclosure of the Company's voluntary compliance with the Corporate Governance Code, in conjunction with the provisions of Law 4548/2018.

# Internal Audit Unit

The Internal Audit Unit is responsible for conducting Internal Audits to monitor and improve the functions and Policies regarding our Internal Audit System. More specifically, the Unit ensures the improvement of our corporate governance, risk management processes, and audit procedures by adopting a systematic, disciplined approach focused on the risks. The Internal Audit Unit is responsible for monitoring the

implementation of procedures and policies that promote good and lawful management in all Group Companies and units, including the safe and efficient operation of facilities, the accuracy and reliability of accounting and operational data, the protection of Group Companies' resources from mismanagement and illegal actions and the appropriate management of business risks.

As part of its responsibilities, the Internal Audit Unit:

## Monitors, controls and evaluates:

- the implementation of the Rules of Procedure and the Internal Control System, in particular with regard to the adequacy and accuracy of the financial and non-financial reporting provided, risk management, regulatory compliance and the Corporate Governance Code adopted by the Company
- the quality assurance mechanisms
- the corporate governance mechanisms
- the compliance with the commitments included in the Company's prospectuses and business plans regarding the use of funds raised on the regulated market

**Prepares reports to the audited entities** reporting findings on the risks arising from them and the proposals for improvement, if any.

# Audit Committee

The Audit Committee operates as an independent and objective body responsible for reviewing and evaluating the audit practices and performance of the internal and external auditors.

The Audit Committee is also responsible for providing support to the Company's Board of Directors in fulfilling its mission to ensure the effectiveness of the Company's accounting and financial systems, financial reporting, audit mechanisms and operational risk management systems, as well as the effective implementation of the Company's Governance Principles.





## Sustainability Unit

SIDMA Steel recognizes the importance of sustainable development and the benefits of having a Sustainability Unit to integrate ESG criteria into its operations, enhancing its long-term sustainability, reducing potential risks, ensuring compliance with regulations and building stronger relationships with all its stakeholders. To this end, the Company has created a Sustainability Unit in order to strategically plan and implement initiatives that enhance

its environmental and social responsibility. The Sustainability Unit acts as a hub of communication between the Company's Management and its individual Divisions, ensuring the continuous integration of sustainability principles at all levels and unhindered communication. Through the coordination of actions, monitoring of ESG indicators and enhancing transparency, it is instrumental in shaping a responsible and long-term sustainable business future.

## Sustainability Policy

SIDMA Steel has incorporated the principles of Sustainable Development into its business operations and the way it operates, recognizing that these principles are a prerequisite for its long-term growth. Providing for the health and safety of employees, respecting and protecting the environment, meeting the needs of customers in an integrated manner and harmoniously coexisting with the local communities in which it operates are the main issues of the Company's Sustainability Policy. The Company has established a Sustainability Policy, which is fully in line with the values of responsibility, integrity, transparency, efficiency and innovation. The Sustainability Policy is established by the Company's Management and focuses on the following points:

- ◆ implementation of the Sustainability Policy at all levels

- ◆ full compliance with the applicable legislation and implementation of the Company's standards, policies, internal guidelines and relevant procedures
- ◆ open, two-way communication with stakeholders
- ◆ provision of a healthy and safe working environment with equal opportunities
- ◆ protection of human rights
- ◆ continuous efforts to reduce the environmental footprint
- ◆ cooperation and support of the local community
- ◆ continuous efforts to create added value for stakeholders

In order to achieve the above, the Company designs and implements relevant programs on a voluntary basis, while setting strategic priorities.



# Risk Management

Risk Management is a critical pillar of SIDMA Steel broader strategy, as it contributes to the prevention and management of risks. The analysis and proper assessment of these risks enhances the Company's transparency, accountability and long-term resilience, because this approach enables the Company to prevent and manage potential risks that could affect its operations and reputation. As a fundamental element of SIDMA Steel ESG approach, it enhances the Company's sustainability, its compliance with the requirements of the regulatory framework, and the assurance of its long-term value to all its stakeholders.

# Regulatory Compliance

Regulatory compliance is an integral part of the internal control system and is responsible for providing objective assurance to the Group on regulatory compliance issues.

SIDMA Steel applies a Regulatory Compliance Policy and Procedure in order to establish and implement appropriate and updated principles, objectives, responsibilities and implementation guidelines to ensure the Company's full and continuous

compliance with the regulatory framework in a timely manner and to have a comprehensive and accurate view of the extent to which this objective is being achieved at all times.

Regulatory compliance supports the Company in managing all forms of compliance risk by adopting and improving compliance mechanisms at all levels and in the Company's structure.

Compliance risks include, but are not limited to, regulatory compliance, corporate governance, data protection, financial crime and sanctions management.

Compliance responsibilities cover all relevant areas of the Company (operational units, branches and subsidiaries), taking into account possible changes in the Group's current structure.

# Investor Relations & Corporate Announcements Unit

The Investor Relations & Corporate Announcements Unit, which is the main point of contact between the investors and the Company and has a dual role. The Unit is responsible both for informing investors about business developments in the

Company and for informing the Management about the views of the investment community on issues relating specifically to the Company's management and financial results, as well as on general trends in the financial markets.

It is also responsible for providing shareholders with direct and equal information and support in exercising their rights in accordance with the applicable legislation and the Company's Articles of Association.



## Conflict of Interest

SIDMA Steel has a Conflict of Interest Policy, which aims to provide instructions and guidance to the members of the Management, as well as to all employees and executives of the Company, who influence its operations in order to ensure that operational decisions are not influenced by personal interests.

It also identifies the concept, the specificities and the risks that may arise from decisions taken in the context of conflict of interest situations. At the same time, it indicates the methods applied by the Company for preventing and managing these cases in order to ensure, as far as possible, that they do not recur in the future.

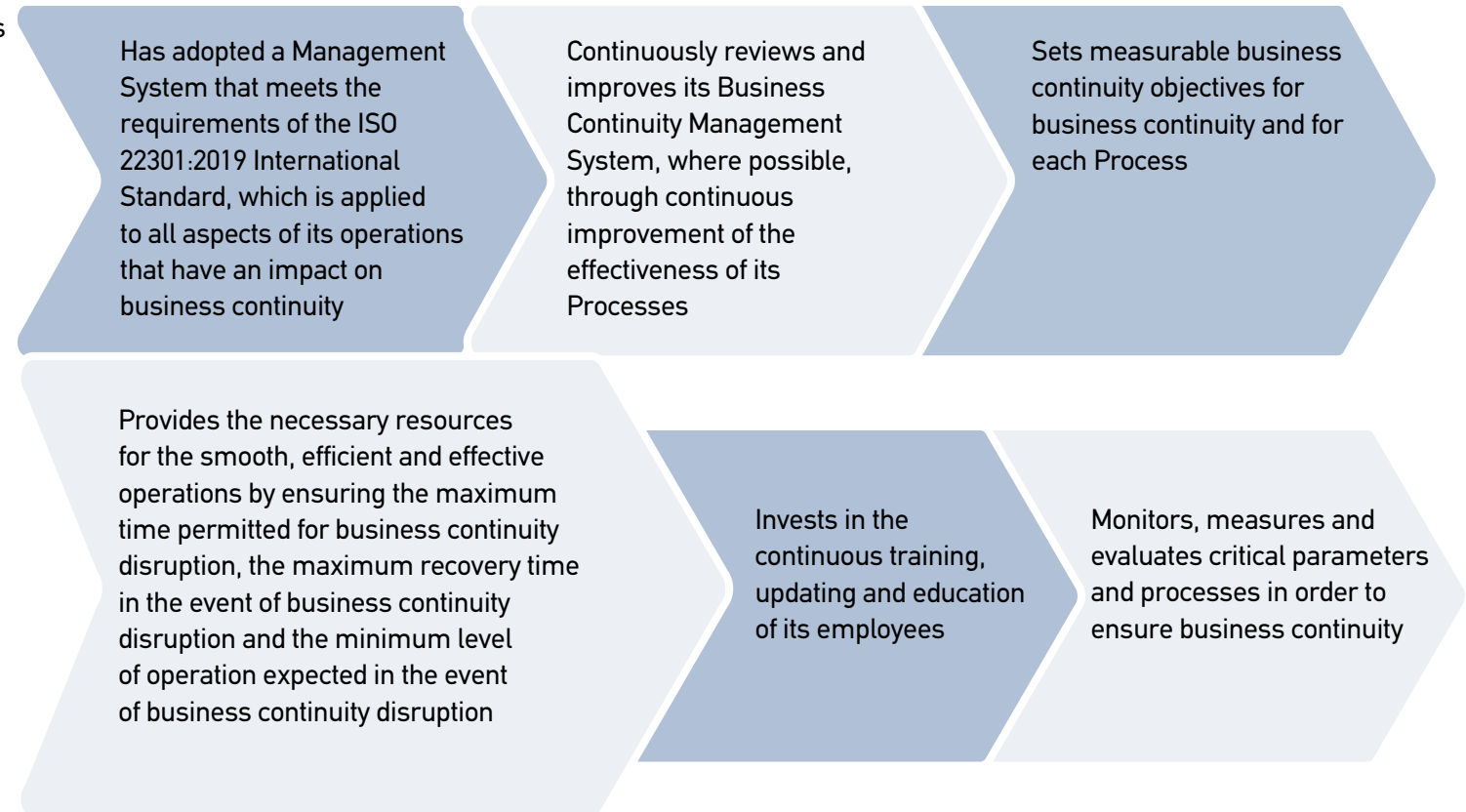
# Business Continuity

Business continuity ensures the uninterrupted operations of SIDMA Steel in the event of crises, disruptions or unforeseen events. The existence and continuous updating of a solid business continuity plan enhances the resilience of the Company and its long-term viability.

The basic principles and commitment of the Company and the philosophy of its employees are:

- to provide clients with services that fully meet their contractual requirements
- to comply with relevant legislative and regulatory requirements
- to meet the business continuity objectives set by the Company for each project it undertakes

In order to achieve the above, the Management of SIDMA Steel:



# Whistleblowing Policy

SIDMA Steel is committed to fostering a culture of transparency and accountability. Therefore, it expects the highest possible level of professional and ethical conduct from all its employees and business partners.

Effective whistleblowing mechanisms are of paramount importance to ensure the integrity and proper functioning of the Company. The ability to report misconduct, breaches of regulations or unethical practices is a cornerstone of prevention and timely response to phenomena that may jeopardize the reputation, compliance

and sustainability of SIDMA Steel. For this reason, SIDMA Steel has developed a Whistleblowing System, which allows the submission of a complaint anonymously or in an eponymous manner.

At the same time, the Company has established a Whistleblowing Policy and Procedure, which defines the framework within which the receipt, evaluation and investigation of each complaint is carried out, with absolute priority given to maintaining the anonymity of the person making the complaint.

This Policy shall be accompanied by a specific and clearly defined procedure which ensures a prompt response,

During 2024 no whistleblowing incidents were recorded through the whistleblowing mechanism

a clear allocation of responsibilities and efficient management. The Chief Compliance Officer plays a decisive

role in the supervision, management and eventual resolution of complaints.

This allows employees and third parties to safely and confidentially report incidents or signs of violations of the law, internal policies or ethical practices of the Company without having to fear reprisals. At the same time, this system contributes substantially to the early detection and response to corruption, irregularities or other forms of unacceptable conduct, reinforcing a culture of transparency and accountability.



During 2024 no incidents  
of personal data breaches  
were recorded

## Personal Data Protection

Personal data protection is a fundamental principle for ensuring the privacy of individuals and constitutes a key pillar of SIDMA Steel operation when processing personal information. In order to comply with the current legislative framework and in particular with the General Data Protection Regulation (GDPR), the Company is committed to implementing all necessary technical and organizational measures for the secure collection, processing, storage and management of data, thereby safeguarding the rights and freedoms of data subjects.

The correct and lawful management of personal data is a priority and

responsibility of the Company, while promoting the trust of all parties dealing with it. SIDMA Steel is committed to the protection of personal data processed in the context of its business processes and operations and its compliance with international and domestic legislation and best practices in the processing of personal data. At the same time, the protection of personal data is the responsibility of all the Company's employees, its external partners, associates and other third parties acting on its behalf. The Company has a Personal Data Protection Policy and a separate Policy for each stakeholder - Board of Directors, shareholders, employees and customers.



# The major **non-financial risks**

The smooth operation of SIDMA Steel may be affected by various direct and indirect risks. The main categories of non-financial risks identified by the Company relate to climate change and health and safety at work.

## Climate Change:

We recognize the impact of climate change globally and are taking measures to mitigate it. We closely monitor international trends and are constantly taking new mitigation measures, such as increasing carbon emissions by making new investments. We are already operating RE plants to reduce the use of fossil fuels and aim to further expand similar initiatives.

## Health and Safety at Work:

Aiming at continuous monitoring and continuous improvement of safety parameters related to risks to the health and safety of employees and the prevention of injuries, we implement an integrated management system and a program to reduce accidents, while investing in equipment and continuous training of employees.

# Performance and Economic Growth

Financial performance is a key pillar of sustainable development and reflects the stability and resilience of SIDMA Steel, enabling long-term investment in environmental and social initiatives and enhancing transparency and stakeholder confidence.

The following is the financial performance achieved by the Company in 2024:

		2023	2024
FINANCIAL DATA in €			
Company financial data	Total revenue (turnover)	158,296,489	141,709,487
	Operating profit	3,433,758	3,893,105
	Operating costs	160,187,527	142,722,343
	Payments to capital providers	9,999,876	10,667,378
	Profit / (losses) before tax	-3,093,412	-3,813,991
	Net profit / (losses) after tax	-2,701,004	-3,488,228
	Payments for taxes - indirect (VAT)	4,902,727	3,071,461
	Payments for taxes - direct	5,288,023	3,544,459
	Total payments to public entities (total direct and indirect taxes paid)	10,190,750	6,615,920
	Equity	25,704,948	23,151,088
	Total investments	2,368,633	702,985
	<b>Total assets</b>	<b>137,042,078</b>	<b>130,667,915</b>

		2023	2024
SOCIAL PRODUCT in €			
To employees	Payroll (gross employee compensation)	4,891,221	5,146,063
	Contributions to social security funds	1,216,406	1,284,974
	Other employee benefits	202,215	232,878
	Compensations	153,834	85,050
	<b>Total to employees</b>	<b>137,042,078</b>	<b>6,748,965</b>
To other interested parties	Payments to capital providers (banks etc.)	9,999,876	10,667,378
	Taxes paid (to the Greek State)	10,190,750	6,615,920
	Purchases from domestic suppliers (incl. VAT)	45,234,142	40,368,542
	Purchases from foreign suppliers	90,214,620	90,275,887
	<b>Total</b>	<b>155,639,388</b>	<b>147,927,728</b>

# Appendix

# 05

# Stakeholders Table

Stakeholder groups	Communication channels	Key issues	The Company's Response
<b>Shareholders</b> <b>Frequency of communication:</b> Monthly and whenever necessary	<ul style="list-style-type: none"> <li>▪ General meeting of shareholders</li> <li>▪ Press releases, announcements, presentations</li> <li>▪ Social media</li> <li>▪ Telephone/electronic communication</li> <li>▪ Annual financial report</li> <li>▪ Sustainability report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Growth, profitability, and good reputation of the Company</li> <li>▪ Good corporate governance and business ethics</li> <li>▪ Ensuring timely and reliable information</li> <li>▪ Effective Risk Management</li> <li>▪ Boosting competitiveness</li> </ul>	<ul style="list-style-type: none"> <li>▪ Publication of results and financial statements in order to continuously and fully inform investors</li> <li>▪ Sustainability Report</li> <li>▪ Continuous improvement of the economic performance and reputation of the Company</li> </ul>
<b>Investors</b> <b>Frequency of communication:</b> Whenever necessary	<ul style="list-style-type: none"> <li>▪ Press releases, announcements, presentations</li> <li>▪ Social media</li> <li>▪ Telephone/electronic communication</li> <li>▪ Annual financial report</li> <li>▪ Sustainability report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Growth, profitability, and good reputation of the Company</li> <li>▪ Good corporate governance and business ethics</li> <li>▪ Ensuring timely and reliable information</li> <li>▪ Effective Risk Management</li> <li>▪ Boosting competitiveness</li> </ul>	<ul style="list-style-type: none"> <li>▪ Publication of results and financial statements in order to continuously and fully inform investors</li> <li>▪ Sustainability Report</li> <li>▪ Improvement of performance on sustainability issues</li> </ul>
<b>Employees</b> <b>Frequency of communication:</b> Daily	<ul style="list-style-type: none"> <li>▪ Intranet</li> <li>▪ Meetings</li> <li>▪ Telephone/ electronic communication</li> <li>▪ Human resources department</li> <li>▪ Employee satisfaction survey</li> <li>▪ Employee appraisals</li> <li>▪ Open communication with management</li> <li>▪ Social media</li> <li>▪ Company Newspaper</li> <li>▪ Events and seminars</li> </ul>	<ul style="list-style-type: none"> <li>▪ Health and safety at work</li> <li>▪ Recognition and rewarding of skills</li> <li>▪ Training and development of professional and personal skills</li> <li>▪ Equal opportunities and benefits</li> <li>▪ Collaboration and open communication with management</li> <li>▪ Stable work environment</li> <li>▪ Transparency, open dialogue, and information</li> </ul>	<ul style="list-style-type: none"> <li>▪ Implementation of relevant policies and procedures</li> <li>▪ Provision of equal opportunities for training and development</li> <li>▪ Additional benefits</li> <li>▪ Open communication and dialogue</li> </ul>



Stakeholder groups	Communication channels	Key issues	The Company's Response
<b>Customers</b> <b>Frequency of communication:</b> Daily	<ul style="list-style-type: none"> <li>▪ Telephone/electronic communication</li> <li>▪ Regular meetings</li> <li>▪ Sales Department</li> <li>▪ Customer satisfaction survey</li> <li>▪ Social media</li> <li>▪ Press releases &amp; announcements</li> <li>▪ Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Quality and reliability of products &amp; services</li> <li>▪ Management and resolution of problems and complaints</li> <li>▪ Transparency, information, and open communication</li> <li>▪ Safety and labelling of products</li> <li>▪ Customer-oriented approach</li> </ul>	<ul style="list-style-type: none"> <li>▪ Ensuring high quality of products and services provided</li> <li>▪ Continuous communication with customers to respond to their needs and complaints</li> <li>▪ Continuous strengthening of customer-oriented philosophy</li> </ul>
<b>Suppliers</b> <b>Frequency of communication:</b> Daily	<ul style="list-style-type: none"> <li>▪ Procurement department</li> <li>▪ Press releases, announcements, presentations</li> <li>▪ Social media</li> <li>▪ Telephone/electronic communication</li> <li>▪ Regular meetings</li> <li>▪ Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Transparency, information, and open communication</li> <li>▪ Timely payment and favourable payment terms</li> <li>▪ Stable and mutually beneficial cooperation</li> <li>▪ Training and information</li> <li>▪ Compliance with market laws and regulations</li> </ul>	<ul style="list-style-type: none"> <li>▪ Creation of close cooperation and transparent communication</li> <li>▪ Training and information programmes for suppliers</li> </ul>
<b>State/Authorities</b> <b>Frequency of communication:</b> Whenever necessary	<ul style="list-style-type: none"> <li>▪ Telephone and electronic communication – when required</li> <li>▪ Annual financial report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Responsible and compliant Company operations</li> <li>▪ Good corporate governance and business ethics</li> <li>▪ Payment of taxes and employer contribution</li> </ul>	<ul style="list-style-type: none"> <li>▪ Full compliance with the law</li> </ul>
<b>Local communities</b> <b>Frequency of communication:</b> Whenever necessary	<ul style="list-style-type: none"> <li>▪ Press releases, announcements, presentations</li> <li>▪ Telephone and electronic communication with local authorities</li> <li>▪ Information campaigns</li> <li>▪ Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Supporting local suppliers and boosting local employment</li> <li>▪ Support for local community initiatives</li> <li>▪ Information and open communication on Company operations</li> <li>▪ Protection of the environment</li> </ul>	<ul style="list-style-type: none"> <li>▪ Support of local suppliers</li> <li>▪ Job openings for the local community</li> <li>▪ Actions for improving the Company's environmental performance</li> </ul>
<b>Financial Institutions</b> <b>Frequency of communication:</b> Monthly and whenever necessary	<ul style="list-style-type: none"> <li>▪ Telephone and electronic communication</li> <li>▪ Press releases, announcements, presentations</li> <li>▪ Annual financial report</li> <li>▪ Sustainability Report</li> </ul>	<ul style="list-style-type: none"> <li>▪ Reliability, integrity, and transparency</li> <li>▪ Effective risk management</li> <li>▪ Financial performance</li> <li>▪ Sustainable Development</li> </ul>	<ul style="list-style-type: none"> <li>▪ Publication of results and financial statements</li> <li>▪ Positive response to obligations</li> <li>▪ Improving sustainability performance</li> </ul>

# About the Report

## Scope of application

The Sustainability Report of SIDMA Steel "STEEL PRODUCTS – SIDMA STEEL S.A." referred to in this Report as "SIDMA Steel" or the "Company" is the third non-financial reporting and covers the period 1/1/2024 to 31/12/2024 and includes data for the year 2023 for comparative purposes. This Report aims to directly inform the Company's stakeholders on ESG and sustainability issues, summarizing its performance for 2024 in these areas.

Through this Report, the Company describes how it responds comprehensively to contemporary economic, environmental, and social challenges, while contributing to its Sustainable Development and corporate responsibility. The qualitative and quantitative information presented in the Report covers all of SIDMA Steel operations in Greece.

The 2024 Sustainability Report of SIDMA Steel, is available online on the SIDMA website in the "Sustainable Development" section.

## Methodology

This Report was prepared in accordance with the GRI Standards of the international organization GRI, at the basic level of agreement – Core. The principles of GRI were also applied for the definition of content regarding the completeness of the information presented, the materiality of issues, the response to stakeholders' needs, and the overall framework of the organisation's Sustainable Development performance, as well as all the principles for its quality.

The Materiality Assessment was conducted based on the internationally recognized GRI Standards and the industry standard Sustainability Accounting Standards Board (SASB), in order to identify the Company's most material issues. Stakeholder input was also taken into account through a specialized engagement exercise, as well as the 17 Sustainable Development Goals (SDGs) of the United Nations and the indices of the Athens Stock Exchange's ESG Reporting Guide.

## Project Team

A Sustainable Development Unit has been set up to prepare this report and effectively manage related issues, including the collection of relevant information and data.

The preparation of the report was supported and scientifically managed (data collection, assessment and preparation) by Grant Thornton. ([www.grant-thornton.gr](http://www.grant-thornton.gr)).



## External assurance

The data presented in this Report has not been audited by an independent third party. However, recognizing that this process can be useful and add value, the Company will consider the possibility of an external audit in a future publication.

## Sources of information

The information and data presented in this Report have been collected by Company on the basis of internal recording procedures and databases maintained as part of the implementation of the relevant

management systems. Where data is presented after processing or based on assumptions, the nature or method of calculation is indicated in accordance with the GRI Standards guidelines.

## Limitations

There is no limitation on the scope or limits of the Report that would affect the year-on-year comparison of information.

## Contact

Please submit your comments and observations on the Report or fill in the attached contact form at the end of the Report and send it to the following address:

### SIDMA Steel S.A.

188, Megaridos Ave., 19300 Aspropyrgos, Attica

### ATTN: Matina Tsili

Human Resources Director/Chief Compliance Officer

▷ [info@sidma.gr](mailto:info@sidma.gr) ▷ [www.sidma.gr](http://www.sidma.gr)

# ATHEX ESG Reporting Guide 2024

Pillar	2024 ID	2024 Sub - ID	Metric Title	Reference
ENVIRONMENT	C-E1	C-E1-1	Scope 1 emissions - Total amount of direct emissions (Scope 1)	Page 34
	C-E1	C-E1-2	Scope 1 emissions - GHG intensity of Scope 1 emissions	Page 34
	C-E2	C-E2-1	Scope 2 emissions - Total amount of indirect emissions (Scope 2) - Location based approach	Page 34
	C-E2	C-E2-2	Scope 2 emissions - GHG intensity of Scope 2 emissions - Location based approach	Page 34
	C-E2	C-E2-3	Scope 2 emissions - - Total amount of indirect emissions (Scope 2) - Market based approach	Page 34
	C-E2	C-E2-4	Scope 2 emissions - - GHG intensity of Scope 2 emissions - Market based approach	Page 34
	C-E3	C-E3-1	Energy consumption and production - Total amount of energy consumed within the organisation	Page 34
	C-E3	C-E3-2	Energy consumption and production - Percentage of electricity consumed	58%
	C-E3	C-E3-3	Energy consumption and production - Percentage of renewable energy consumed	Page 34
	C-E3	C-E3-4	Energy consumption and production - Total amount of energy produced	Page 34
	C-E3	C-E3-5	Energy consumption and production - Percentage of renewable energy produced	100%
	A-E1	A-E1-1	Scope 3 emissions - Total amount of other indirect emissions (Scope 3)	-
	A-E1	A-E1-2	Scope 3 emissions - GHG intensity of Scope 3 emissions	-
	A-E2	A-E2-1	Climate change risks and opportunities - Discussion of climate change-related risks and opportunities that can affect business operations	Page 30
	A-E3	A-E3-1	Waste management - Total amount of hazardous waste	Page 36
	A-E3	A-E3-2	Waste management - Total amount of non-hazardous waste	Page 36
	A-E3	A-E3-3	Waste management - Percentage of waste by type of treatment - Recycled	Page 36
	A-E3	A-E3-4	Waste management - Percentage of waste by type of treatment - Composted	0%
	A-E3	A-E3-5	Waste management - Percentage of waste by type of treatment - Incinerated	0%

Pillar	2024 ID	2024 Sub - ID	Metric Title	Reference
ENVIRONMENT	A-E3	A-E3-6	Waste management - Percentage of waste by type of treatment - Landfilled	0%
	A-E3	A-E3-7	Waste management - Total amount of radioactive waste	The Company does not produce radioactive waste.
	A-E4	A-E4-1	Total amount of effluent discharge containing polluting substances	There are no discharges with polluting substances.
	A-E5	A-E5-1	Biodiversity sensitive areas - Description of the impact of business operations on biodiversity sensitive areas	SIDMA Steel does not operate in areas that have been designated as areas of sensitive biodiversity
	A-E6	A-E6-1	Climate change policy	<a href="#">Energy and Climate Change Policy</a>
	A-E7	A-E7-1	Removals and carbon credits - GHG removals and storage	Not applicable to the Company's approach.
	A-E7	A-E7-2	Removals and carbon credits - Carbon credits	Not applicable to the Company's approach.
	A-E8	A-E8-1	Total GHG emissions - Total GHG emissions location based	Page 34
	A-E8	A-E8-2	Total GHG emissions - Total GHG emissions market based	Page 34
	SS-E3	SS-E3-1	Water consumption - Total water withdrawn	Page 35
SOCIETY	C-S1	C-S1-1	Stakeholder engagement - Discussion of organisation's main stakeholders and analysis of key stakeholder engagement practices	Page 95
	C-S2	C-S2-1	Percentage of female employees	16.9%
	C-S3	C-S3-1	Percentage of women at top management level	20%
	C-S4	C-S4-1	Employee turnover - Percentage of full-time employee voluntary turnover	Page 48
	C-S4	C-S4-2	Employee turnover - Percentage of full-time employee involuntary turnover	1.25%
	C-S4	C-S4-3	Employee turnover - Total employee turnover	Page 48
	C-S5	C-S5-1	Employee training - Average training hours of employees at top management level	Page 52
	C-S5	C-S5-2	Employee training - Average training hours of the rest employee categories	Page 52
	C-S5	C-S5-3	Employee training - Average training hours - Women	Page 51
	C-S5	C-S5-4	Employee training - Average training hours - Men	Page 51
	C-S6	C-S6-1	Human rights policy - Description of human rights policy and fundamental principles	Page 45

Pillar	2024 ID	2024 Sub - ID	Metric Title	Reference
SOCIETY	C-S7	C-S7-1	Percentage of employees covered by collective bargaining agreements	Page 42
	C-S8	C-S8-1	Value chain - Discussion of supplier screening using ESG criteria	Page 27
	C-S8	C-S8-2	Value chain - Policies to manage material impacts, risks and opportunities related to workers in the value chain	Pages 43-47
	A-S2	A-S2-1	Total amount of monetary expenditure on employee training	€21,378.8
	A-S3	A-S3-1	Percentage of difference between male and female earnings	0,35%
	A-S4	A-S4-1	CEO pay ratio - Total CEO pay	€110,869.00
	A-S4	A-S4-2	CEO pay ratio - Ratio of CEO to median employee earnings	390%
	SS-S6	SS-S6-1	Health and safety performance - Number of injuries	Page 62
	SS-S6	SS-S6-2	Health and safety performance - Number of fatalities	0
	SS-S6	SS-S6-3	Health and safety performance - Accident frequency rate	Page 62
	SS-S6	SS-S6-4	Health and safety performance - Accident severity rate	Page 62
	SS-S8	SS-S8-1	Customer satisfaction - Disclosure of customer satisfaction survey results	Page 25
	SS-S9	SS-S9-1	Customer grievance mechanism - Description of key operations and procedures of Customer Grievance Mechanism	Page 89
GOVERNANCE	C-G1	C-G1-1	Board composition - ESG related qualifications of the board members	The Company has no legal obligation in this regard <a href="#">ANNUAL FINANCIAL REPORT</a> , page 30
	C-G1	C-G1-2	Board composition - Classification of the Chairman of the Board	Page 73
	C-G1	C-G1-3	Board composition - Percentage of female board members	Page 73
	C-G1	C-G1-4	Board composition - Percentage of non-executive board members	Page 73
	C-G1	C-G1-5	Board composition - Percentage of independent non-executive board members	Page 73
	C-G1	C-G1-6	Board composition - Number of board members	Page 72
	C-G1	C-G1-7	Board composition - Average age of board members	55
	C-G2	C-G2-1	Sustainability oversight - Description of approach to sustainability oversight	Page 72
	C-G3	C-G3-1	Materiality - Description of the materiality assessment process	Page 19



Pillar	2024 ID	2024 Sub - ID	Metric Title	Reference
GOVERNANCE	C-G3	C-G3-2	Materiality - Approach	Page 19
	C-G4	C-G4-1	Sustainability Policy - Description of sustainability policy and fundamental principles	Pages 17, 85
	C-G5	C-G5-1	Business ethics policy - Description of business ethics policy and fundamental principles	<a href="#">Code of Ethics &amp; Business Conduct</a>
	C-G6	C-G6-1	Data security policy - Description of data security policy and fundamental principles	<a href="#">Personal Data Protection Policy</a>
	C-G7	C-G7-1	Sustainability reporting - Basis for preparation of sustainability reporting	Page 96
	C-G7	C-G7-2	Sustainability reporting - List all its entities included in the sustainability reporting	Page 96
	C-G8	C-G8-1	Financial Reporting - Date of publication	April 11, 2025
	A-G1	A-G1-1	Strategy, business model and value chain - Discussion of strategy, business model and value chain	Pages 15-16, 21, 74
	A-G2	A-G2-1	Business ethics violations - Total amount of monetary losses as a result of business ethics violations	Page 77
	A-G2	A-G2-2	Business ethics violations - Total number of business ethics violations	0
	A-G3	A-G3-1	ESG targets - Short-term targets associated with strategic ESG objectives	Page 21
	A-G3	A-G3-2	ESG targets - Medium-term targets associated with strategic ESG objectives	Page 21
	A-G4	A-G4-1	Percentage of executive's variable pay	0%
	A-G5	A-G5-1	External assurance - Discussion of external assurance on reported ESG information - Scope of information covered	Not applicable
	A-G5	A-G5-2	External assurance - Discussion of external assurance on reported ESG information - Level of assurance	Not applicable
	SS-G1	SS-G1-1	Whistleblower policy - Description of whistleblower policies and procedures	Page 89
	SS-G2	SS-G2-1	Critical risk management - Description of systems, processes and mechanisms to identify and mitigate critical risks	<a href="#">ANNUAL FINANCIAL REPORT</a> , page 33
	SS-G3	SS-G3-1	Systemic risk management - Description of systems, processes and mechanisms to reduce contributions to systemic risks and improve safeguards	<a href="#">ANNUAL FINANCIAL REPORT</a> , pages 33-34

# GRI Content Index

## GRI 1: Foundation

<b>GRI 1: Foundation statement of use</b>	The information provided in this report reflects the activities of SIDMA Steel for the period from 1/1/2024 – 31/12/2024 presenting its economic, environmental, and social performance. The report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards.
<b>GRI 1 used</b>	GRI 1: Foundation 2021
<b>Applicable GRI Sector Standard(s)</b>	No applicable GRI Sector Standard

## GRI 2: General Disclosures 2021

GRI Standards	Disclosure	Reference
<b>1. THE ORGANIZATION AND ITS REPORTING PRACTICES</b>		
2-1	Organizational details	Page 96
2-2	Entities included in the organization's sustainability reporting	Page 96
2-3	Reporting period, frequency and contact point	Page 96
2-4	Restatements of information	Page 96
2-5	External assurance	Page 96
<b>2. ACTIVITIES AND WORKERS</b>		
2-6	Activities, value chain and other business relationships	Pages 9,11-15, 26-27,74
2-7	Employees	Pages 40-53
2-8	Workers who are not employees	SIDMA Steel employs 23 individuals from third-party companies.
<b>3. GOVERNANCE</b>		
2-9	Governance structure and composition	Pages 72-73
2-10	Nomination and selection of the highest governance body	Pages 72, 79
2-11	Chair of the highest governance body	Page 73
2-12	Role of the highest governance body in overseeing the management of impacts	Page 72

**GRI 2: General Disclosures 2021**

GRI Standards	Disclosure	Reference
2-13	Delegation of responsibility for managing impacts	Page 72
2-14	Role of the highest governance body in sustainability reporting	Page 19
2-15	Conflict of interest	Page 87
2-16	Communication of critical concerns	Pages 71-72
2-17	Collective knowledge of the highest governance body	The members of the Board of Directors participate in seminars and conferences related to sustainable development and are also informed by department directors.
2-18	Evaluation of the performance of the highest governance body	The performance of the Board of Directors is evaluated annually at the Ordinary General Assembly, which assesses the outcomes of the decisions they have made regarding the operation and development of the Company
2-19	Remuneration policies	The Remuneration Policy of the members of the Board of Directors and senior executives is available on the corporate website <a href="#">(REMUNERATION POLICY OF THE MEMBERS OF THE BoD – SIDMA)</a>
2-20	Process to determine remuneration	
2-21	Annual total compensation ratio	

**4. STRATEGY, POLICIES, AND PRACTICES**

2-22	Statement on sustainable development strategy	Page 3
2-23	Policy commitments	Pages 17, 30, 31, 33, 45-47, 49, 55, 77, 80, 85-87, 89-90
2-24	Embedding policy commitments	Pages 17, 30, 31, 33, 45-47, 49, 55, 77, 80, 85-87, 89-90
2-25	Processes to remediate negative impacts	Pages 44-47, 89
2-26	Mechanisms for seeking advice and raising concerns	Page 89
2-27	Compliance with laws and regulations	Pages 70, 75-90
2-28	Membership associations	Page 28

**5. STAKEHOLDER ENGAGEMENT**

2-29	Approach to stakeholder engagement	Page 95
2-30	Collective bargaining agreements	Page 42

**GRI 3: Material Topics 2021**

GRI Standards	Disclosure	Reference
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Page 19
	3-2 List of material topics	Page 19

**ADAPTATION TO CLIMATE CHANGE****Material issue for:** Shareholders, Customers, Suppliers, State and Authorities, Local Communities

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 30-38, 74
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Page 34
	305-2 Energy indirect (Scope 2) GHG emissions	Page 34
	305-4 GHG intensity of emissions	Page 34

**RESPONSIBLE ENERGY MANAGEMENT****Material issue for:** Shareholders, Customers, Suppliers, State and Authorities, Local Communities

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 30-38, 74
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Page 34
	302-3 Energy intensity	Page 34

**OCCUPATIONAL HEALTH AND SAFETY****Material issue for:** Employees, Suppliers, State and Authorities

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 54-62, 74
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 56
	403-2 Hazard identification, risk assessment, and incident investigation	Page 57
	403-3 Occupational health services	Pages 59-60
	403-4 Worker participation, consultation, and communication on occupational health and safety	Pages 54, 59-60
	403-5 Worker training on occupational health and safety	Page 59
	403-8 Workers covered by an occupational health and safety management system	100%
	403-9 Work-related injuries	Page 62

**GRI 3: Material Topics 2021**

GRI Standards	Disclosure	Reference
<b>EQUAL OPPORTUNITIES AND HUMAN RIGHTS</b>		
<b>Material issue for:</b> Employees, Suppliers, State and Authorities, Local Communities		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	Pages 19, 21, 40-53, 74
<b>GRI 401: Employment</b>	401-1 New employee hires and employee turnover	Pages 48
	401-2 Benefits provided to full-time employees that are not provided to temporary or parttime employees	Page 50
<b>GRI 405: Diversity and Equal Opportunity 2016</b>	405-1 Diversity of governance bodies and employees	Page 42
	405-2 Ratio of basic salary and remuneration of women to men	1, 02
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	No such incident occurred/was reported during the reporting year of the Report
<b>EMPLOYEE TRAINING AND DEVELOPMENT</b>		
<b>Material issue for:</b> Shareholders, Employees		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	Pages 19, 21, 40-53, 74
<b>GRI 404 Training and Education 2016</b>	404-1 Average hours of training per year per employee	Page 51
	404-2 Programs for upgrading employee skills and transition assistance programs	Page 52
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 53
<b>CONSULTATION AND SUPPORT OF LOCAL COMMUNITIES</b>		
<b>Material issue for:</b> Local Communities		
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topic	Pages 19, 21, 63-68, 74
<b>GRI 203 Indirect Economic Impacts 2016</b>	203-1 Infrastructure investments and services supported	Pages 64-68



**GRI 3: Material Topics 2021**

GRI Standards	Disclosure	Reference
<b>SOUND ADMINISTRATION AND BUSINESS ETHICS</b>		
<b>Material issue for:</b> Shareholders, Employees		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 70-93
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Pages 92-93
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and actions taken	Page 77
<b>RISK MANAGEMENT</b>		
<b>Material issue for:</b> Shareholders, Investors, Employees, Customers, Suppliers, Financial Institutions		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 70-93
Company Index	Risk Management Framework	Pages 86, 91
<b>VALUE CREATION FOR ALL STAKEHOLDERS</b>		
<b>Material issue for:</b> Shareholders, Investors, Employees, Customers, Suppliers, State and Authorities, Local Communities, Financial Institutions		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 74
Company Index	Value creation framework for all stakeholders	Page 15
<b>RESPONSIBLE PROCUREMENT MANAGEMENT</b>		
<b>Material issue for:</b> Shareholders, Investors, Customers, Suppliers, State and Authorities, Local Communities, Financial Institutions		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 19, 21, 26-27, 74
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Page 26
Company Index	Number of suppliers assessed based on environmental and social criteria	Page 27

# Feedback form

## Which SIDMA Steel S.A. stakeholder group do you belong to?

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Shareholders      | <input type="checkbox"/> Investors              | <input type="checkbox"/> Employees                      |
| <input type="checkbox"/> Customers         | <input type="checkbox"/> Suppliers              | <input type="checkbox"/> State and Authorities          |
| <input type="checkbox"/> Local communities | <input type="checkbox"/> Financial Institutions | <input type="checkbox"/> Other: ..... (please describe) |

## How would you evaluate SIDMA Steel S.A. 2024 Annual Sustainability Report?

(1) Strongly disagree, (2) Disagree, (3) Neither agree nor disagree, (4) Agree, (5) Strongly agree

	1	2	3	4	5
1. The principles and issues that you consider necessary for the sustainable development of the Company are adequately covered					
2. There is a good balance and clarity between the different sections of the Report					
3. The Report structure has a nice flow and is easy to read					
4. The graphical representation of the information is clear					
5. The visual aspect is satisfactory and the infographics included positively enrich the Report					

## Please highlight any issues that have not been addressed and should be included in the next Report:

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## Please describe the key concerns and/or issues you identified during your work with SIDMA Steel S.A.:

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Please send this filled-in form to the following address:

### SIDMA Steel S.A.

188, Megaridos Avenue, 19300 Aspropyrgos, Attica

For the attention of: Mrs. Matina Tsili. Human Recourses Director/Chief Compliance Officer

▷ [info@sidma.gr](mailto:info@sidma.gr) ▷ [www.sidma.gr](http://www.sidma.gr)



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