



Sustainability Report 2025



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Antonis Karadeloglou
Chairman of the BoD

Message from the Chairman

Dear Stakeholders,

It is with great pleasure that we present the Sustainability Report of SIDMA Steel for the year 2025. This publication marks the 4th consecutive annual disclosure of our strategy. Remaining true to our values, we continue to publish our data on a voluntary basis, acknowledging our ethical commitment to transparently share our achievements and future targets.

In an international environment marked by significant challenges, the role of businesses towards society and the environment is now more critical than ever. At SIDMA Steel, we transform these challenges into opportunities for growth, remaining committed to our vision of building a resilient and sustainable future.

Guided by our core values of integrity, quality, and innovation, we transparently and responsibly reflect, through this Sustainability Report, our commitment to generating a positive impact on the environment, society, and the economy. The past year reaffirmed,

once again, the importance of responsible business conduct, and at SIDMA Steel, we succeeded in maintaining our steadfast commitment to operating in accordance with the principles of sustainability and accountability. Sustainability, however, is not merely a strategic pillar – it is an integral part of our identity and a compass for our business decisions. For this reason, we recognise the value of establishing a robust and comprehensive framework for the effective management of material sustainability matters.

The transition to a lower carbon footprint represents not only an environmental, but also a business priority. With a clear direction towards decarbonisation and the transition to a more sustainable production model, we continuously strengthen our investments in environmentally friendly technologies. Furthermore, we place particular emphasis on the optimal management of energy and natural resources, adopting practices that contribute to the reduction of greenhouse gas emissions. We invest in a targeted

and systematic manner in the energy upgrade of our facilities, while simultaneously advancing the reduction of our carbon footprint, through the application of circular economy principles and the enhancement of recycling.

Our production activity in 2025 was accompanied by a significant reduction in location-based emission intensity of approximately 18%, thereby reinforcing our steady progress towards decarbonisation as part of SIDMA Steel's broader sustainability strategy.

At SIDMA Steel, we recognise the contribution of our employees – who constitute our most valuable human capital – as the fundamental driver in achieving our objectives. In this context, we apply international human rights principles and respect the national and local regulatory frameworks in the countries in which we operate. The Universal Declaration of Human Rights, together with the high corporate values upheld by the Company, shape a rigorous governance framework across the full spectrum of its activities. Committed to safeguarding any right that may be at risk as a result of our operations, we ensure the implementation of due

diligence mechanisms and adopt decisions free from any form of discrimination.

The continuous improvement of working conditions, the increase in training provided on Occupational Health and Safety matters, as well as our shift towards digital transformation, have significantly strengthened our prevention culture within the occupational health and safety framework. We recognise the importance of our people and always operate guided by the principles of human rights protection, the cultivation of trust, meritocracy, equal opportunities, training, and professional development. Within this context of progress, in 2025 we recorded a 42% increase in training hours compared to the previous year.

Our social footprint reflects SIDMA Steel's commitment to creating value for society. Continuing our systematic and consistent stakeholder engagement, in order to implement initiatives that deliver genuine added value, we carried out volunteering activities and support actions for vulnerable groups during 2025, thereby contributing to the strengthening of social cohesion.

The comprehensive corporate governance and operational framework at SIDMA Steel ensures that every aspect of our activities is governed by the principles of regulatory compliance, responsible business conduct, and ethical integrity. Through a coherent framework of policies, procedures, and mechanisms, alongside a robust internal control system, we safeguard business continuity and operational excellence, consistently striving towards ever higher standards of performance.

Guided by respect for people, society, and the environment, we continue to evolve with accountability, consistency, and a clear strategic orientation. With our sights set on 2030, we transform challenges into opportunities for progress and remain committed to our path of sustainable development and the creation of long-term value for all our stakeholders.

Antonis Karadeloglou

Chairman of the BoD



Company Profile



01

SIDMA Steel

SIDMA Steel S.A. is a leading company in the trading and industrial processing of steel products, while also operating in the design and manufacture of specialised construction products, investing in cutting-edge technologies and high-quality standards.

With a presence of nearly 100 years in both the Greek and international markets, the Company has established itself as a trusted partner, offering integrated solutions that combine experience, innovation, and technical expertise.

Over the course of almost a century in the business landscape, the Company has achieved a great deal. Yet there is one achievement of which it is particularly proud: having earned the respect and trust of all those who have come to know it and engaged with it in any capacity.

The Company operates modern facilities at strategic locations across Greece, covering a wide range of needs across various industrial and construction sectors, and maintains sufficient inventory to ensure prompt delivery.

Sustainable development constitutes a central pillar of SIDMA Steel's strategy, with emphasis on reducing its environmental footprint, supporting the economy, and fostering a safe and equitable working environment. Through continuous investment in innovative technologies and a highly skilled workforce, SIDMA Steel maintains its leading position in the Greek market, while simultaneously strengthening its international presence.



Vision, Mission and Business Principles

At SIDMA Steel, our vision remains steadfast and clear: **to maintain our leading position in the Greek steel market and to continuously strengthen our presence in South-Eastern Europe**, securing a prominent standing in the Balkan markets.

Our mission is founded on building relationships of trust with our customers. We strive to be their first choice, by gaining an in-depth understanding of their needs and responding promptly and reliably.

We offer **innovative solutions** and products and services of high quality, at competitive prices, while consistently honouring our commitments.

The achievement of our objectives is underpinned by **teamwork** and our human capital. We invest in our people, providing a safe and supportive working environment, offering opportunities for career advancement, skills development, and enhancement of **technical expertise**. We believe

that the Company's progress is inextricably linked to the progress of its people.

At the same time, we strive to serve as a **benchmark for responsible business conduct**. We combine tradition and integrity with continuous growth and innovation. We place people at the centre of our operations, support our communities, and actively contribute to improving our social and environmental footprint.

Our Business Principles

Since our founding, we have operated with the firm conviction that a company can be simultaneously competitive, profitable, and socially responsible. This philosophy shapes our strategic choices and defines

our relationships with all stakeholders affected by our operations.

The Group's Management considers it a duty to continuously inform and raise awareness among

employees, associates, and suppliers regarding the principles that govern our conduct. These principles constitute the foundation of our corporate culture and guide our behaviour at every level.



Towards Our Shareholders:

We are committed to safeguarding their investment and ensuring a satisfactory return on capital, under conditions of full transparency.



Towards Our Customers:

We provide high-quality products and services, on competitive terms, that genuinely respond to their needs.



Towards Our Employees:

We recognise that our people are our greatest strength. Respecting their rights, ensuring safe and decent working conditions free from discrimination, and supporting their development are essential prerequisites for achieving our corporate objectives.



Towards Our Business Partners:

We believe in mutually beneficial relationships with suppliers of goods and services, as well as with contractors who collaborate with us, and we are committed to upholding our Code of Ethics in all such relationships. Our business partners undertake the same commitment in return.

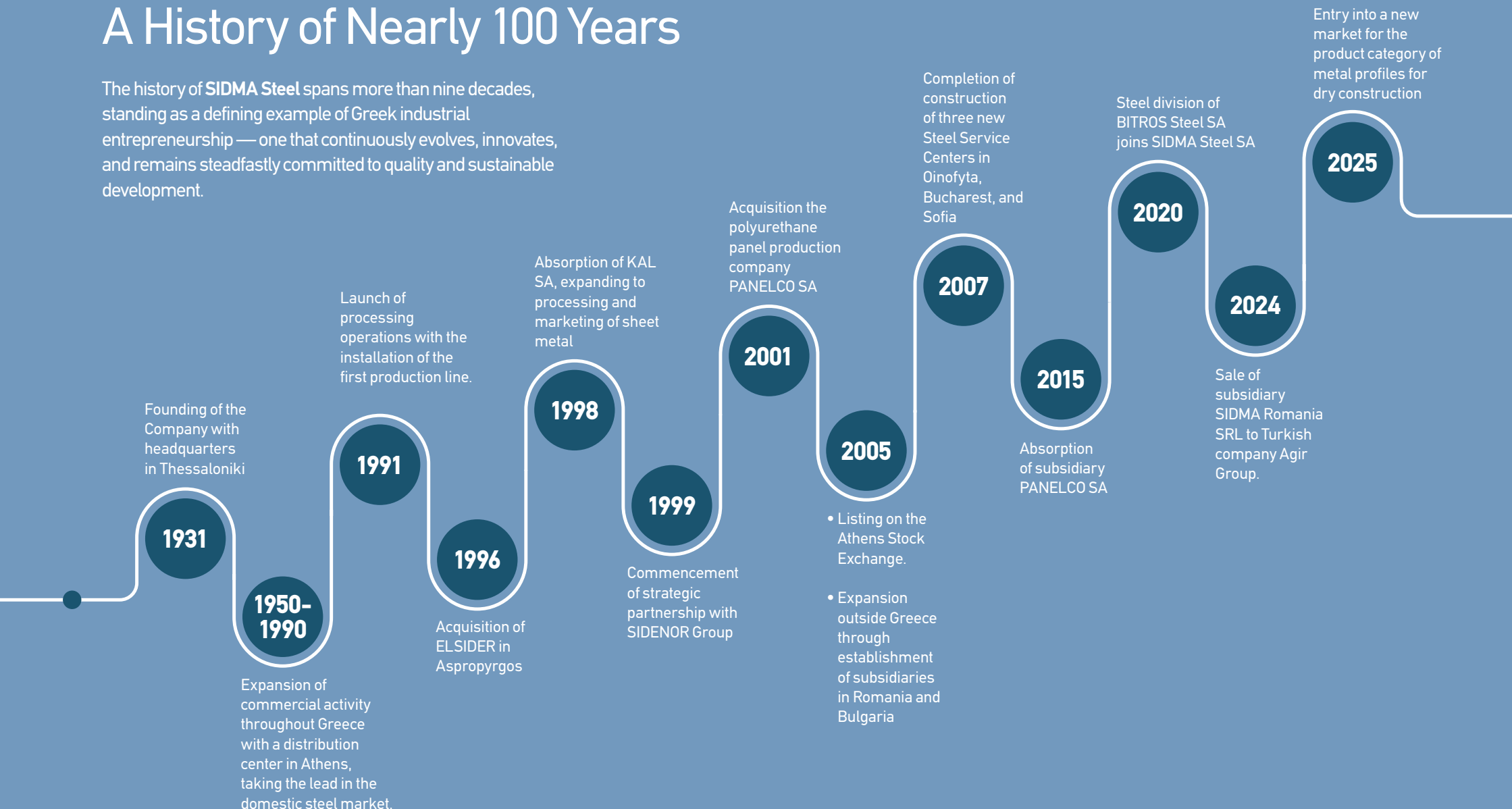


Towards Society:

We operate as a responsible corporate citizen, contributing to the progress and well-being of the society.

A History of Nearly 100 Years

The history of **SIDMA Steel** spans more than nine decades, standing as a defining example of Greek industrial entrepreneurship — one that continuously evolves, innovates, and remains steadfastly committed to quality and sustainable development.



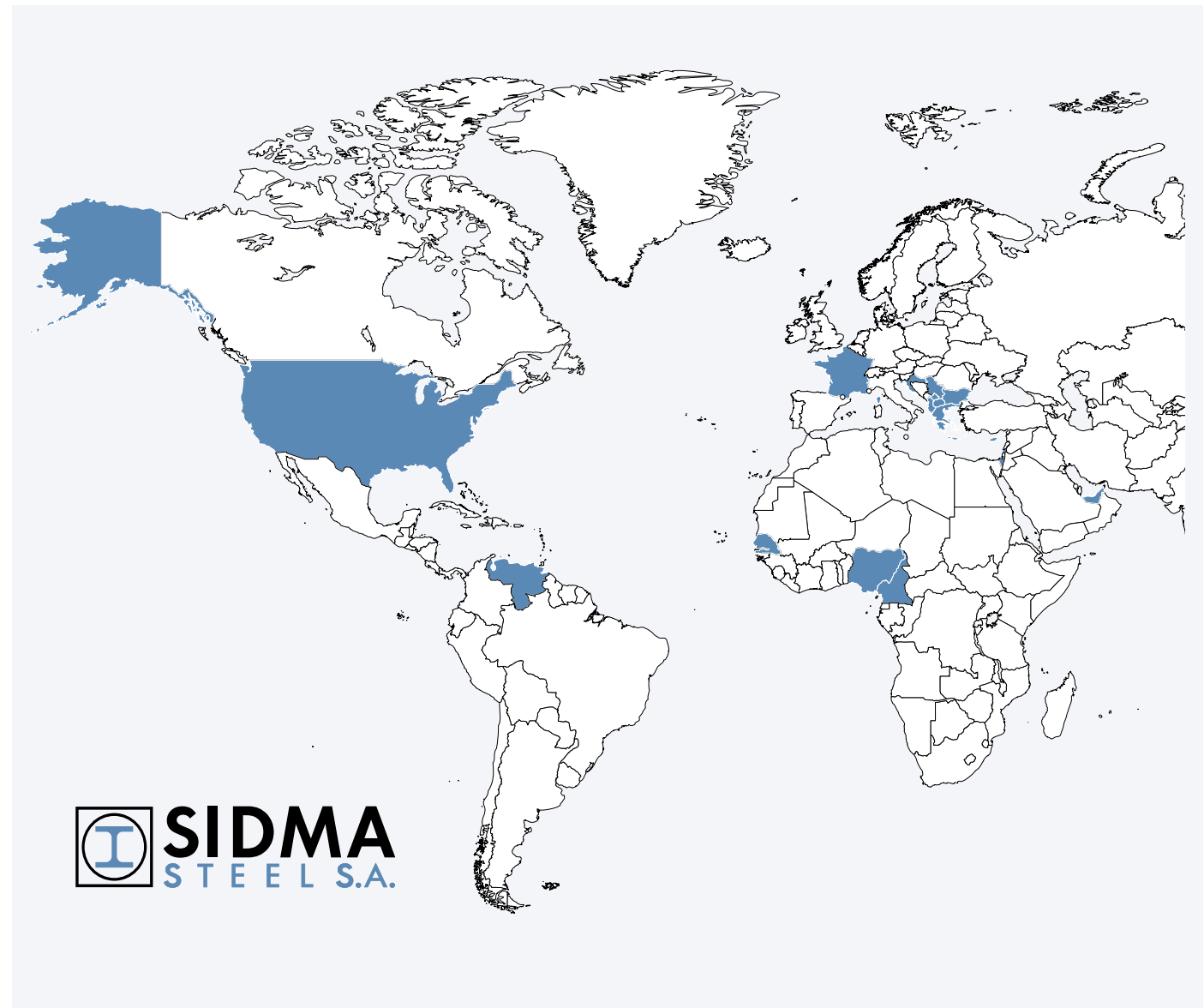
International Presence

Beyond Greece, SIDMA Steel maintains a dynamic presence in international markets, continuously strengthening its footprint abroad.

The Group operates in Albania, Bulgaria, Serbia, North Macedonia, and Cyprus, while having further extended its international reach through exports to countries including France, Croatia, Kosovo, the United Arab Emirates, Israel, Cameroon, Nigeria, Senegal, the United States, and Venezuela.

The Company delivers high-quality products across its entire distribution network, consolidating its leadership position in the market for steel products, construction materials, and cladding solutions, while reinforcing its reputation as a trusted and reliable partner at the international level.

This outward-looking strategy enables the Company to closely monitor regional market developments, respond promptly to the needs of its customers, and advance sustainable development in every country in which it operates.



Business Model

SIDMA Steel has developed an integrated business model that responds to the demands of a constantly evolving economic and technological environment. At the core of this model lies customer satisfaction, the provision of high-quality products, and the creation of long-term value for all stakeholders.

The Company's business model is built upon four key pillars:

Customer-Centric Approach

SIDMA Steel systematically monitors market developments and customer needs, offering tailored solutions, technical support, and products that meet the highest quality standards. Continuous service improvement and prompt responsiveness are fundamental elements of its operations.

Competitive Advantages and Expertise

With over 90 years of experience, state-of-the-art facilities, and a highly specialised workforce, the Company sustains and strengthens its competitive advantages.

Investment in new technologies, automation, and innovative production processes further consolidates its position in both domestic and international markets.

Effective Resource Management

The business model clearly defines the resources required to support the Company's sustainable development:

- Modern production infrastructure
- A robust supplier network
- A highly skilled human capital base
- Responsible management of materials and energy

The efficient utilisation of resources contributes to improved operational performance and a reduced environmental footprint.

Sustainable Development and Responsible Business Conduct

SIDMA Steel integrates sustainability principles at every stage of its operations. Its business model supports:

- Responsible sourcing practices
- Safe and fair working conditions
- Reduction of environmental impacts
- Transparency and high-standard corporate governance

In this way, the Company ensures its long-term resilience and its capacity to generate value for both the economy and society.

SIDMA Steel – Business Model



KEY PARTNERSHIPS

- High-quality raw material suppliers
- Quality assurance bodies
- Research centres and organisations



COST STRUCTURE

- Raw materials
- Maintenance of infrastructure and equipment at production facilities
- Product and facility certifications
- Employee remuneration



MAIN ACTIVITIES

- SIDMA Steel is a leading company in the trading and industrial processing of steel products. The main product categories on which our manufacturing and commercial activities are focused, based on the final form of the products, are: flat products, long products, tubular products, and wire products (representation). The Company is also active in the production and trading of construction and cladding products.



KEY RESOURCES

- Production facilities
- High-grade mechanical and processing equipment
- Highly qualified personnel



VALUE CREATION AND UTILITY

The Company has been present since 1931, holding a leading position in its sector, and operates fully integrated Steel Service Centers in Athens and Thessaloniki. Furthermore, the Company continuously leverages new technologies, maintaining a modern and dynamic production structure, while being distinguished by strong specialisation and technical expertise, operational efficiency, and comprehensive knowledge of the business environment.



COMPETITIVE ADVANTAGES

- Innovation and technological excellence
- High-quality products and best-in-class customer service
- Customer-centric philosophy
- Over 90 years of experience and expertise in steel
- Quality Management System certified in accordance with the requirements of ELOT EN ISO 9001:2015



CUSTOMER RELATIONS

- Customer-centric philosophy and continuous stakeholder engagement
- Systematic customer satisfaction assessment



COMMUNICATION CHANNELS

- Extensive sales network across the entire Greek territory
- International trade fairs
- Customer satisfaction surveys
- Press releases
- Mass media



CUSTOMER CATEGORIES

- Trading companies
- Small and medium-sized manufacturing enterprises
- Construction and engineering companies



REVENUE STRUCTURE

- Product sales
- Provision of services
- Sales primarily on credit terms



ENVIRONMENTAL AND SOCIAL COSTS

- Greenhouse gas emissions arising from energy consumption
- Waste generation
- Ongoing need for upgrading production units and systems

Sustainable Business Model Canvas by Alexander Osterwalder and Yves Pigneur



ENVIRONMENTAL AND SOCIAL BENEFITS

- Alignment of business activities with SIDMA Steel's sustainable development strategy
- Focus on innovation and the responsible use of resources
- Value creation for all stakeholders, with particular emphasis on local communities

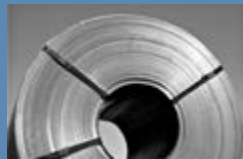
Our Products

SIDMA Steel holds a comprehensive portfolio of steel products, covering the needs of industry, construction, and manufacturing. The main product categories on which the Company's manufacturing and commercial activities are focused, based on the final form of the products, are as follows:

Flat Products



Hot Rolled Coils & Sheets (Black)



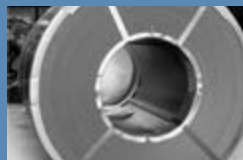
Hot Rolled Coils & Sheets Pickled & Oiled



Hot Rolled Coils & Sheets with Surface Pattern



Cold Rolled Coils & Sheets



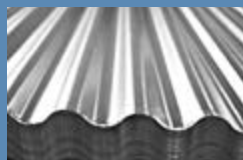
Galvanized Coils & Sheets



Prepainted Coils & Sheets



Plastified Coils & Sheets

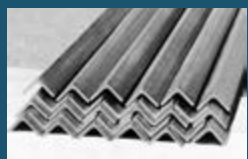


Galvanized Sheets Corrugated & Trapezoidal

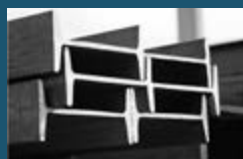


Quarto & Shipbuilding Plates

Long Products



Merchant Bars



Beams



Crane Rails – Steel Rails

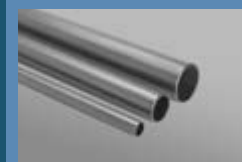
Tube products



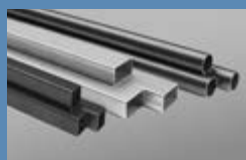
Hollow Structural
Sections as Rolled &
Galvanized



ERW Construction &
Scaffolding Steel Tubes



ERW Construction
Galvanized Steel Tubes



Thin Wall Tubes

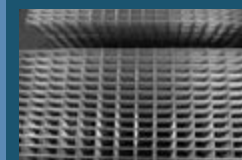
Wire products



Galvanized Wire



Black Wire



Galvanized Fencing
Mesh

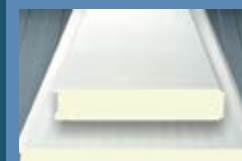
Panelco construction and cladding products



Polyurethane Panels
Roof (PUR)



Polyisocyanurate
Panels (PIR)



Frigo Panels



Mineral Wood Panels



Trapezoidal Profiles



Purlins/
Flashins

Our Facilities

SIDMA Steel operates an extensive network of processing, production, and commercial facilities in Greece and abroad, ensuring high production capacity, prompt service delivery, and operational flexibility across all markets in which it operates. These facilities form the core of the Company's operational infrastructure and play a decisive role in maintaining its leadership position in the steel sector.

The Company maintains three processing and production facilities in Greece and abroad, as well as Sales Offices:



In Aspropyrgos, Attica, where the Company's registered headquarters, Central Offices, Commercial Department, and distribution and processing centre are located.

- 35 acres
- 13.500 m²
- Shotblasting Machine/CNC Lased & Bed for Metal Cutting/Saw
- 60% of total sales

In Oreokastro, Thessaloniki, where the Local Administrative Services, Commercial Department, and distribution and processing centre are located.

- 53 acres
- 20.000 m²
- Slitting and Cut-to-length lines
- 30% of total sales



In the Industrial Area of Lamia (VIPE Lamia), where the production facilities for construction and cladding products, operating under the commercial brand name Panelco, are located.

- 43 acres
- 10.500 m²
- Production Facilities of Polyurethane Panels
- 10% of total sales

In Bulgaria, where the distribution and processing centre is located.

- 35 acres
- 9.000 m²
- Slitting and Cut-to-length lines



Product Quality as Our Priority

SIDMA Steel remains steadfastly committed to the production, trading, and processing of high-quality products and services. The Company's objective is to achieve full customer satisfaction and build long-term relationships of trust, through reliable solutions that meet the evolving demands of the market.

To this end, the Company has adopted a holistic approach to quality assurance, encompassing all of its activities - from the procurement of

raw materials and production processes, through to product management, quality control, and distribution.

The Company applies advanced manufacturing methods and quality control procedures, leveraging technologically sophisticated equipment and processes that ensure consistent quality, high precision, and operational efficiency. At the same time, it places emphasis on cost optimisation, in order to deliver high added-value products that meet the needs and expectations of its customers.

In this context, the Company invests in key areas that enhance its overall performance, including:



The foundation for achieving the quality strategy is the continuous monitoring of the Integrated Quality Management and Occupational Health & Safety Management System. Management is briefed at regular meetings by the Integrated

System Manager and Facility Managers on the Company's performance against the relevant key performance indicators (KPIs), ensuring that quality objectives remain central to its operations.

In this way, the Company reinforces its position as one of the most reliable and quality-driven providers of steel products in Greece and South-Eastern Europe.

Customer Satisfaction

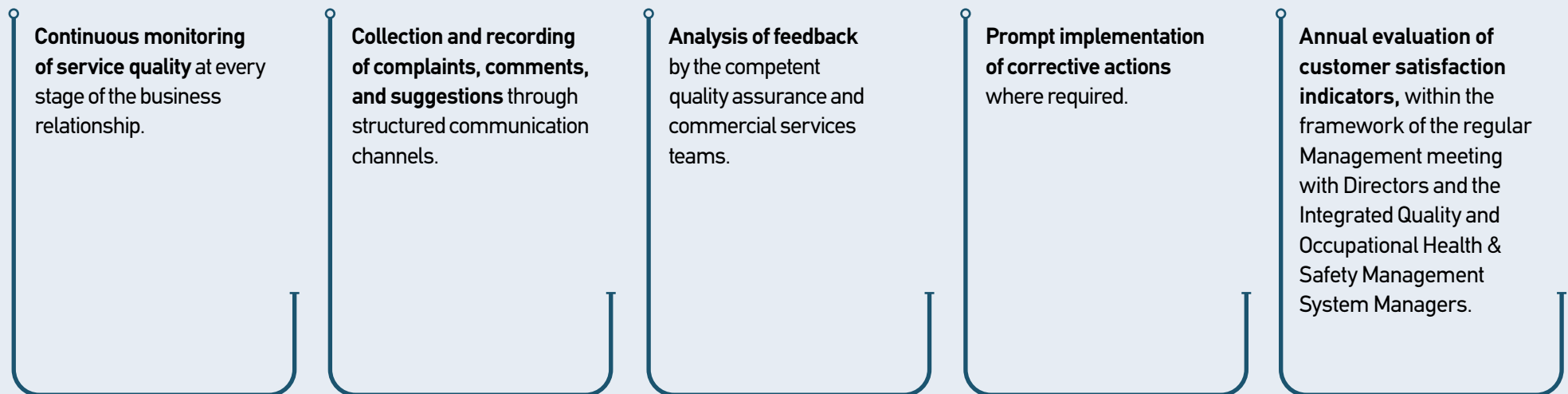
SIDMA Steel places the provision of high-quality products and services at the forefront of its strategic priorities, thereby strengthening customer trust and satisfaction. The Company systematically invests in understanding customer needs and in delivering prompt, effective responses, reinforcing its long-standing customer-centric culture.

To achieve this objective, the Company has developed and implements a structured process for managing and evaluating customer experience, which enables:

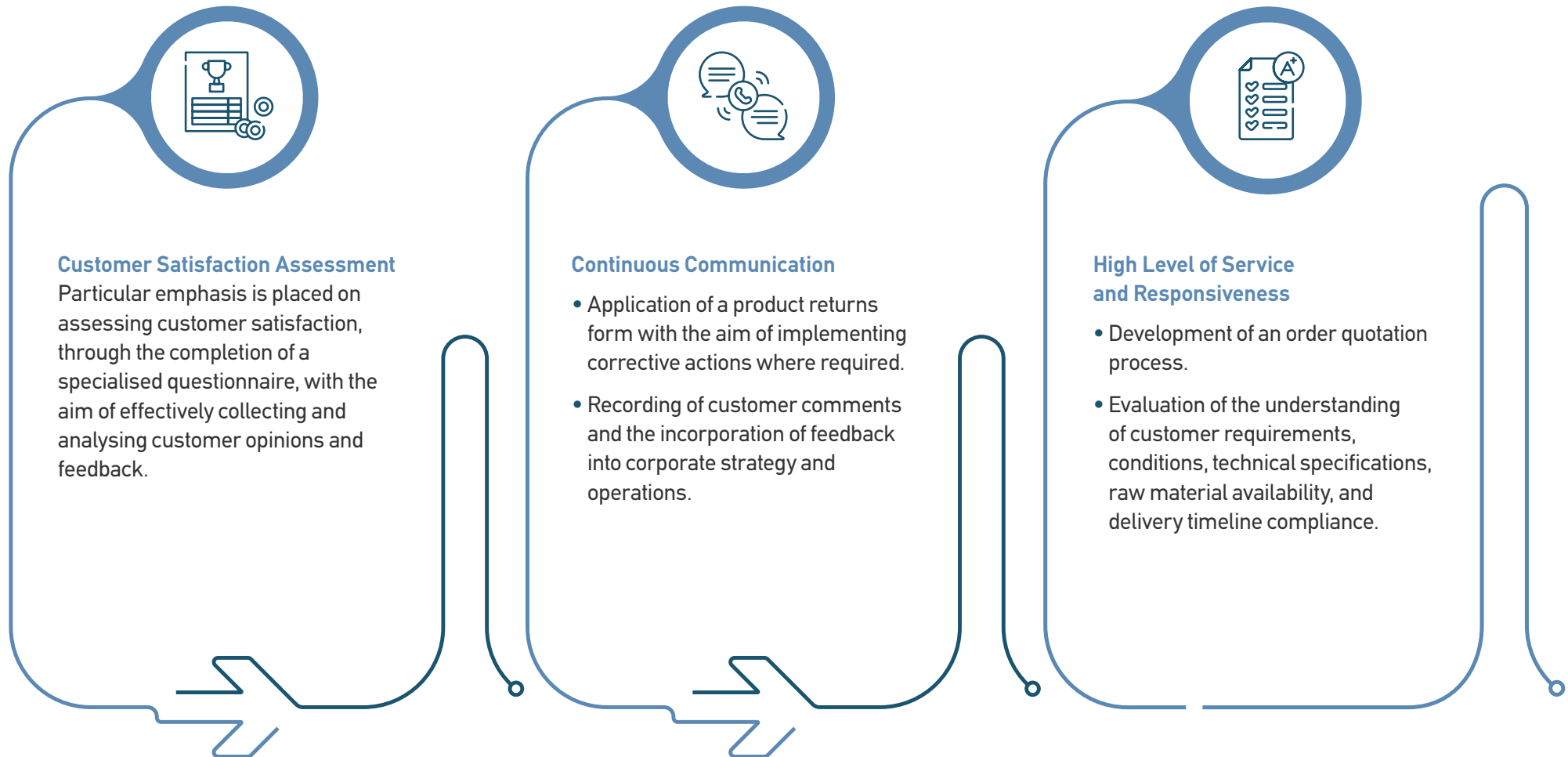


This process is based on multiple communication channels, through which customers can express their needs, observations, and expectations. Feedback is systematically assessed and utilised to inform decisions that enhance the quality of products and services.

The key elements of the process applied by SIDMA Steel to ensure customer satisfaction include:



This systematic approach enables the Company to maintain high levels of satisfaction, strengthen customer trust, and continuously improve its products and services, thereby contributing to its long-term sustainable development.



Supply Chain

SIDMA Steel has built its growth on fostering relationships of trust with both its customers and its suppliers. Recognising that the supply chain is a critical factor for its operational effectiveness and sustainable development, the Company has adopted a responsible and strategically structured approach to procurement.

In this context, the Company implements specific practices aimed at maintaining sustainable, transparent, and mutually beneficial partnerships with its suppliers. Continuous and open communication is a key element of this approach, conducted on a daily basis through all available channels and direct personal contact.

Given the nature of its operations, the Company works primarily with international suppliers for the procurement of raw and auxiliary materials, ensuring high quality, reliability, and consistency. At the same time, in support of the local economy and community, the Company chooses to engage

with local suppliers wherever this is feasible and compatible with its operational requirements.

Responsible supply chain management encompasses:

- Evaluation and selection of suppliers based on quality, technical, and environmental criteria.
- Continuous monitoring of performance and compliance with the Company's requirements.
- Strengthening of transparency at every stage of the business relationship.
- Promotion of responsible practices in the areas of quality, safety, and sustainability.
- Long-term partnerships, with the objective of ensuring stability and mutual growth.

In this way, SIDMA Steel ensures that its supply chain operates with consistency, accountability, and high-quality standards, contributing to the overall resilience and competitiveness of the Company.



SIDMA Steel – Supply Chain

Suppliers

- International suppliers of raw and auxiliary materials
- Local suppliers where possible

Quality Control & Evaluation

- Specification review
- Supplier performance evaluation
- Compliance with quality and sustainability standards

Production & Processing

- Steel Processing Centers (Athens, Thessaloniki, Balkans)
- Production of building and cladding materials (Lamia Industrial Area)

Logistics & Distribution

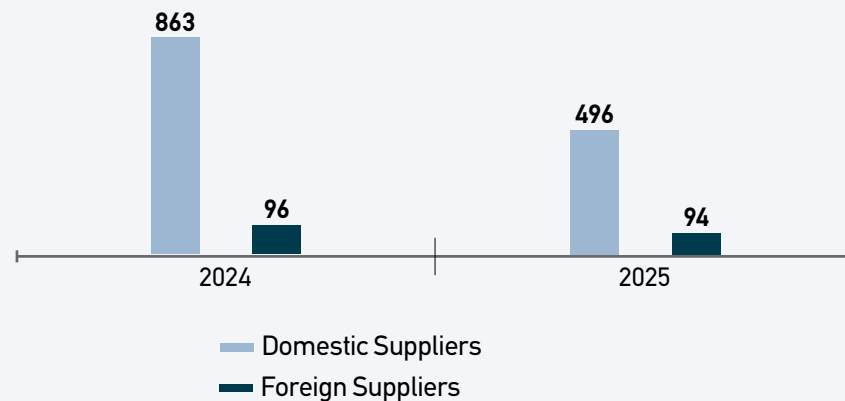
- Daily coordination & communication
- Deliveries via international & local transport partners

Customers & Support

- Customer service & technical support
- Feedback collection & improvement initiatives

Geographical Distribution of Suppliers

Distribution of Suppliers

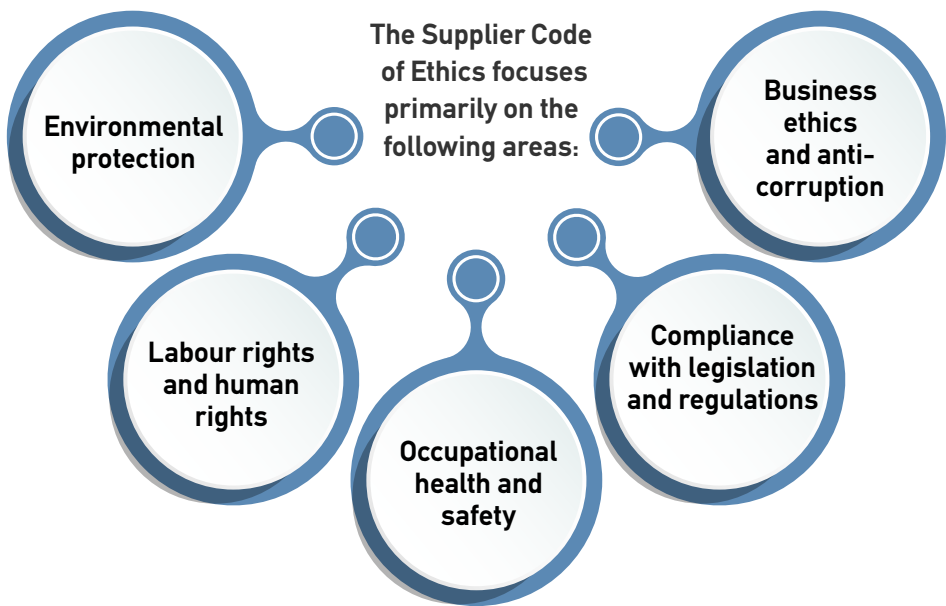


Acquisition Share by Supplier

	2024	2025
Domestic Supplier Procurement	52%	48%
Foreign Supplier Procurement	55%	45%

Supplier and Partner Code of Ethics

The Supplier Code of Ethics has been developed to apply to all of the Company's business partners. This Code aims to ensure that SIDMA Steel's suppliers, consultants, and partners share the same values and principles of responsible business conduct as the Company, while also promoting these values throughout their own supply chains.



Supplier and Partner Evaluation

As part of the continuous improvement of its supply chain, the Company has implemented and follows a structured evaluation process with respect to its suppliers. Specifically, it has established criteria that assess both product quality and delivery reliability, as well as the commercial terms of the business relationship.

Number of evaluated suppliers*	2024	2025
Number of suppliers evaluated during the reporting year	216	615
Number of suppliers evaluated against environmental criteria	15	17
Number of suppliers evaluated against labour and social criteria	15	17

**out of the total active suppliers of the Company for the respective reporting year*

Membership in Organisations and Associations

In the context of strengthening communication with key stakeholders that contribute significantly to the development of its activities, SIDMA Steel holds membership in the following organisations and associations:



Hellenic Federation of Enterprises (SEV)

SIDMA Steel is an active member of the Hellenic Federation of Enterprises (SEV), whose purpose is to represent Greek business and industries and to defend their interests, primarily at the 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 - Gemeinschaft Emissionskontrollierte Verlegewerkstoffe, Klebstoffe und Bauprodukte e.V.

Since 2023, SIDMA Steel has been a member of the internationally recognized organization GEV, which promotes the protection of customers, workers, and the environment in the field of chemical construction products. In this context, its products are evaluated and certified in accordance with the VOC emission of EMICODE® classification system.

Sustainability at the Core

02

Our Contribution to the UN Sustainable Development Goals (SDGs)



Our Approach

With a strategic commitment to sustainability, SIDMA Steel reinforces its Corporate Governance framework, achieving a dynamic balance between economic performance, social responsibility, and environmental stewardship. Through an integrated ESG management system, the Company ensures that the principles of sustainable development integrate across all of its business activities.

Operating with agility and vision, the Company transforms contemporary challenges into growth opportunities, while effectively mitigating emerging risks. Its strategy is fully aligned with the United Nations' 17 Sustainable Development Goals (SDGs). By focusing on the three ESG pillars - Environment, Social, and Governance - it sets ambitious and measurable targets, implementing initiatives that create long-term value for all stakeholders.



E

Environment

SIDMA Steel adopts a responsible environmental approach aimed at reducing its environmental footprint. The Company implements policies and procedures covering energy efficiency and emissions reduction, sustainable water use and waste management, resource efficiency, and the promotion of the circular economy. Through targeted initiatives and actions, the Company seeks to actively contribute to environmental protection and climate change mitigation.



S

Society

SIDMA Steel recognises the significance of its social footprint and is committed to operating responsibly towards its employees, investing in a work environment that promotes safety, inclusion, and respect for human rights. Through continuous training programmes and fair career advancement practices, the Company ensures equal opportunities for all.

At the same time, the Company demonstrates genuine and substantive commitment to its customers and the wider community, implementing corporate social responsibility initiatives that strengthen social cohesion and contribute to social well-being and development.



G

Governance

SIDMA Steel adopts and applies high corporate governance standards, which form the foundation of its responsible business conduct. With an unwavering commitment to the principles of transparency, integrity, and business ethics, the Company ensures full compliance with the applicable regulatory framework, while strengthening the trust of investors and social partners. Through a robust governance system, clearly defined management structures, and a comprehensive policy framework, the Company optimises its decision-making processes, ensures effective risk management, and fosters a culture of accountability that runs through every level of its organisational structure. This institutional foundation enables the Company to successfully navigate contemporary challenges, ensuring its sustainable trajectory into the future.



Sustainable Development at the Core

SIDMA Steel consistently integrates sustainability principles into its strategy, with the aim of effectively addressing contemporary challenges and creating a positive impact on the environment and the communities in which it operates. Within this framework, the following sustainable development pillars have been established:



SIDMA Steel operates on the foundation of accountability, transparency, and business ethics, ensuring full compliance with the applicable legislative and regulatory framework. The Company's commitment to these values is non-negotiable and runs through its entire business ecosystem.

In this context, the Company:

- **Promotes Integrity:** It expects its suppliers and business partners to uphold equally high ethical standards.
- **Applies Zero Tolerance:** It unequivocally condemns any form of corruption, bribery, or unethical conduct that could compromise its corporate reputation and credibility.
- **Makes Responsible Choices:** It encourages collaboration with organisations that share its vision of a fair and sustainable marketplace.



SIDMA Steel recognises that its people are its most valuable asset and a determining factor in its successful journey towards sustainable development. The Company creates the conditions for a safe, equitable, inclusive, and fair working environment, where employees can grow both professionally and personally. At the same time, it supports local communities through targeted initiatives, seeking to continuously strengthen its positive social impact.



SIDMA Steel assesses the environmental impact of its operations and takes all necessary measures to mitigate its negative footprint. The Company implements initiatives and actions aimed at reducing energy consumption and emissions, as well as ensuring the responsible management of waste.



At SIDMA Steel, quality and innovation constitute integral elements of its business excellence. The Company consistently pursues the delivery of products and services that add value, investing in cutting-edge technologies and adopting international best practices.

The Company's approach focuses on the following pillars:

- **Quality Assurance & Certifications:** It continuously strengthens its operational framework with internationally recognised certifications (such as ISO), ensuring reliability and safety across the entire production process.
- **Investment in Innovation:** It seeks and adopts innovative solutions that improve efficiency and reduce the environmental footprint of its products, offering a competitive advantage to its customers.
- **Stakeholder Satisfaction:** It builds relationships of trust with its customers and business partners, responding with consistency and agility to the evolving demands of the market.



Sustainability Unit

SIDMA Steel has established and operates a dedicated Sustainability Unit, which serves as the central hub for the design, coordination, and oversight of ESG initiatives. The Sustainability Unit acts as the connecting link between the Company's strategy and its day-to-day operations, ensuring that environmental responsibility and social contribution are organically integrated into the Company's operations. The Unit's core responsibilities include the coordination and implementation of targeted initiatives that strengthen the Company's sustainability footprint, as well as the dissemination of a sustainability culture, acting as a bridge between Management and the organisational units and ensuring that sustainability principles are fully understood and embraced by all employees. Through the operation of this Unit, the Company reinforces a responsible and resilient business model, capable of generating long-term value for all its stakeholders.

Sustainability Working Group

The Sustainability Working Group constitutes the central decision-making and coordination body for SIDMA Steel's ESG priorities. With the active participation of senior executives from across different departments, the Group ensures the cross-functional collaboration required to achieve its objectives. The key operational pillars of the Working Group are to define priorities and approve action programmes aligned with the Company's sustainable development pillars, to act as a catalyst in the implementation of initiatives, monitoring their progress and effectiveness across the full breadth of the Company's operations; and to lead the dissemination and communication of a responsible corporate culture, reinforcing the commitment of all employees to sustainability values. Through the establishment of this Working Group, the Company ensures that its strategic priorities are translated into measurable outcomes, enhancing transparency and accountability.

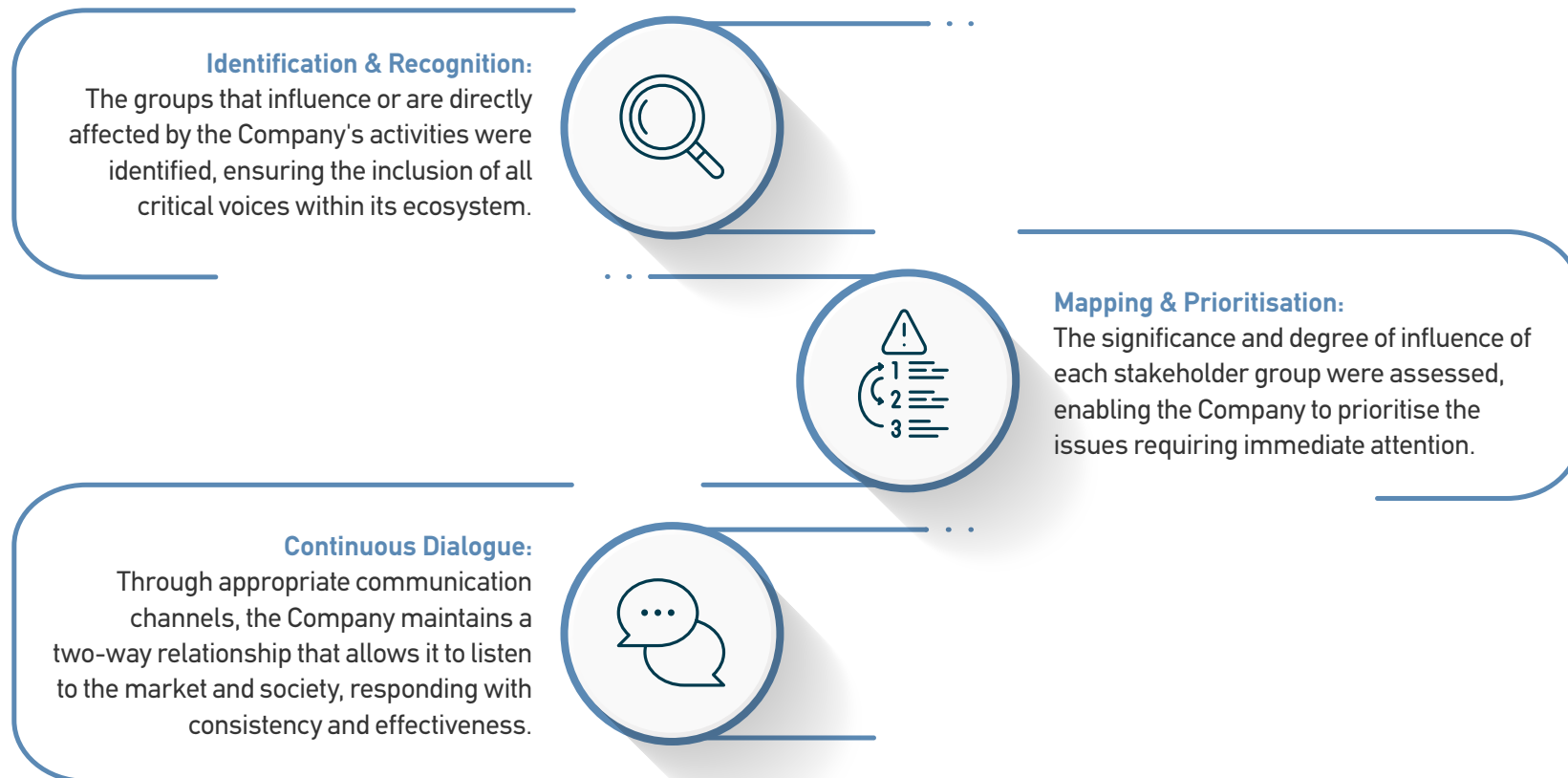
Sustainability Policy

SIDMA Steel treats sustainability as a core pillar of its operations, integrating environmental, social, and corporate governance criteria across all of its activities and decision-making processes. This approach is directly linked to its long-term growth, with emphasis placed on value creation, ensuring safe working conditions, reducing its environmental footprint, delivering reliable solutions to customers, and maintaining relationships of trust with society. In this context, the Sustainability Policy is defined at the highest governance level and guides the Company's overall operations, ensuring continuous performance improvement, compliance with the regulatory framework, and the meaningful embedding of responsible practices across the entire organisation. The Sustainability Policy is fully aligned with the values of accountability, integrity, transparency, efficiency, and innovation.

Stakeholder Engagement

SIDMA Steel recognises that sustainable development requires continuous and meaningful engagement with its stakeholders. A thorough understanding of their needs, expectations, and concerns is a fundamental factor in creating long-term value and securing the Company's Social License to Operate.

The Company's approach is based on a structured three-stage process:



This process strengthens transparency and mutual trust, ensuring that the Company's strategy remains aligned with contemporary social and business imperatives.

The following table provides a detailed overview of the stakeholder groups, the communication channels used to engage with them, the key topics of interest, and the manner in which the Company responds to these:

Stakeholders	Communication Channels	Key Topics of Interest	Company's Response
 Shareholders Communication frequency: <i>Regular</i>	• General Shareholders' Meeting • Press releases • Corporate presentations	• Growth, profitability, and reputation • Transparency and business ethics • Legislative compliance • Effective risk management	• Transparency in results disclosure • Sound corporate governance • Risk management • Continuous updates
 Investors Communication frequency: <i>Regular</i>	• General Meetings • Press releases • Corporate presentations	• Growth and profitability • Transparency • Return on investment • Value creation • Risk management	• Transparency in results disclosure • Strategic investments
 Employees Communication frequency: <i>Daily</i>	• Intranet • Internal meetings • Electronic communication • Human Resources Department • Corporate newsletter (The SIDMA Times) • Training programmes • Performance appraisals • Employee satisfaction surveys	• Fair remuneration • Occupational health and safety • Training and development • Career advancement • Equal opportunities and respect for diversity • Meritocracy • Performance appraisal • Work-life balance	• Competitive compensation packages • Training seminars • Performance reward system • Appraisal and feedback • Additional employee benefits
 Customers Communication frequency: <i>Daily</i>	• Telephone communication • Electronic communication • In-person meetings • SIDMA corporate website • Sales network • Complaints management system	• Competitive pricing • Product and service quality, safety, and reliability • Product and service innovation • Complaints management • Environmental and social responsibility	• High product and service quality standards • Certifications with environmental footprint recognition • Transparency in raw material sourcing • Customer-centric philosophy • Excellence in service and issue resolution

Stakeholders	Communication Channels	Key Topics of Interest	Company's Response
 Suppliers Communication frequency: <i>Daily</i>	• Procurement department • Telephone communication • Electronic communication • Presentations • Industry trade fairs • Supplier site visits	• Terms of cooperation (payment terms) • Competitive pricing • Stable, mutually beneficial partnerships • Training and information sharing • Transparency and open communication	• Fair payment terms • Transparency and meritocracy in supplier selection • Responsible procurement • Exchange of best practices and expertise
 Government & Regulatory Authorities Communication frequency: <i>As required</i>	• Official correspondence • Press releases • Communication with regulatory bodies	• Compliance with the applicable regulatory framework • Accountability and transparency • Sound corporate governance • Payment of taxes and social contributions	• Transparency in reporting (Reports/ Disclosures) • Regulatory compliance • Promotion of innovation • Collaboration with authorities and regulatory bodies
 Local Communities Communication frequency: <i>As required</i>	• Press releases • SIDMA corporate website • Social media • Awareness campaigns • Corporate social responsibility initiatives • Local events	• Sponsorships and donations • Support for local suppliers • Job creation • Implementation of CSR initiatives • Respect for the environment	• Sponsorships and donations • Employee volunteering • Job creation • Collaboration with local suppliers • Contribution to local entrepreneurship • Responsible waste management
 Financial Institutions Communication frequency: <i>As required</i>	• Electronic communication • Press releases • Financial statements	• Financial performance • Reliability, integrity, and transparency • Regulatory compliance • ESG standards alignment • Risk management	• Transparency in disclosures • Audits and inspections • Performance improvement • Risk management

Materiality Assessment

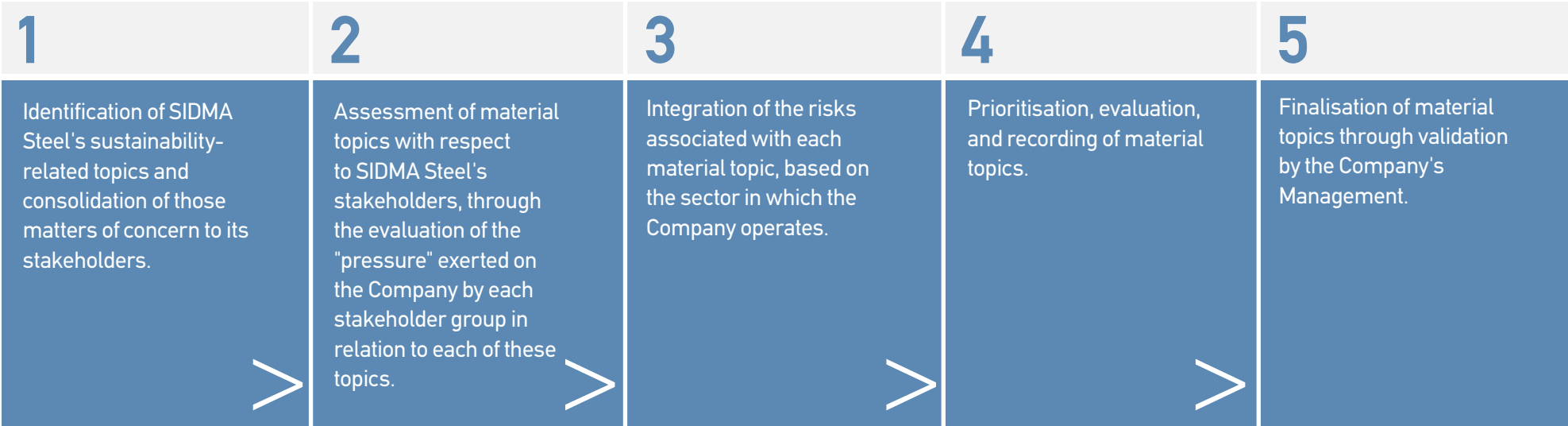
SIDMA Steel has proceeded with the update of its material topics, in accordance with the materiality assessment process. Through this process, topics related to sustainable development that are of particular significance from an environmental, social, and governance (ESG) perspective - both for the Company itself and for its stakeholders- are identified, evaluated, and prioritised. The objective

of this process is the continuous improvement of the Company's strategy towards a more responsible and sustainable mode of operation.

The materiality assessment process (evaluation and prioritisation of material topics) was based on the guidelines of the Global Reporting Initiative (GRI Standards) and the sector-specific categorisation

and assessment framework of the Sustainability Accounting Standards Board (SASB). Through this process, the Company is able to monitor its performance on sustainable development matters, aligning its strategy and setting interim targets, thereby contributing to both the mitigation of emerging risks and the capitalisation of arising opportunities.

The process comprises the following five stages, and was subject to evaluation and formal approval by the Company's Management:



Materiality Matrix



Commitment to the Sustainable Development Goals

SIDMA Steel seeks to make a meaningful contribution, through its active role, to the achievement of the United Nations Sustainable Development Goals (SDGs), promoting, among other things, social well-being, eradication of poverty, and equitable and inclusive development. The following table presents the alignment between the Company's material topics and the Sustainable Development Goals:

Material Topics	Sustainable Development Goals
Environment (E) • Climate change adaptation • Responsible energy management	   
Society (S) • Occupational health and safety • Equal opportunities and human rights • Employee training and development • Community engagement and support	    
Governance (G) • Sound governance and business ethics • Risk management • Value creation for all stakeholders • Responsible procurement	 

SIDMA Steel, guided by its commitment to promoting sustainable development, sets specific targets relating to the Environmental (E), Social (S), and Governance (G) pillars, thereby articulating its commitments to environmental protection, social responsibility, and sound corporate governance. The Materiality

Assessment process yielded specific strategically significant targets, which the Company monitors on an annual basis and updates accordingly. A key consideration is that these targets are aligned with the principles of Sustainable Development, the United Nations Sustainable Development Goals (SDGs), as well as the needs

and expectations of its internal and external stakeholders. Through this approach, the foundations are established for the targeted design of actions and initiatives that are characterised by a positive social and environmental impact, while simultaneously ensuring the Company's long-term sustainability.

Target Setting

The establishment of clear and ambitious targets constitutes the cornerstone of SIDMA Steel's strategy. Through target-setting, the Company defines its strategic direction, ensuring effective planning and the implementation of actions that generate measurable outcomes. Its approach to target-setting focuses on alignment with ESG Standards, measurability & transparency, and continuous improvement.

Material Topics	Target	Year
Environment (E)		
Climate change adaptation	Full implementation of a physical risk resilience plan across all facilities until 2030	2030
Responsible energy management	20% reduction in total energy consumption	2030
Society (S)		
Occupational health and safety	Maintenance of a zero serious work-related injury rate on an annual basis (LTIR < 1)	2026
Equal opportunities and human rights	Achievement of balanced gender representation in leadership positions (at least 20% women)	2027
Governance (G)		
Good governance and business ethics	100% compliance with the Code of Conduct across all organizational levels. Implementation of a digital platform	2026
ESG training for the board of directors	Training of the Board of Directors on ESG matters and regulatory compliance	2027
Risk management	Integration of ESG risks into all Enterprise Risk Management (ERM) systems. Development of an ESG Risk Score indicator and BoD monitoring	2030
Value creation for all stakeholders	Establishment of an Equal Opportunities Policy and a 10% increase in women's representation in leadership positions	2030
Responsible supply chain management	100% of key suppliers assessed against ESG criteria	2028

Putting People First

03

Our Contribution to the UN Sustainable Development Goals (SDGs)



Our Approach

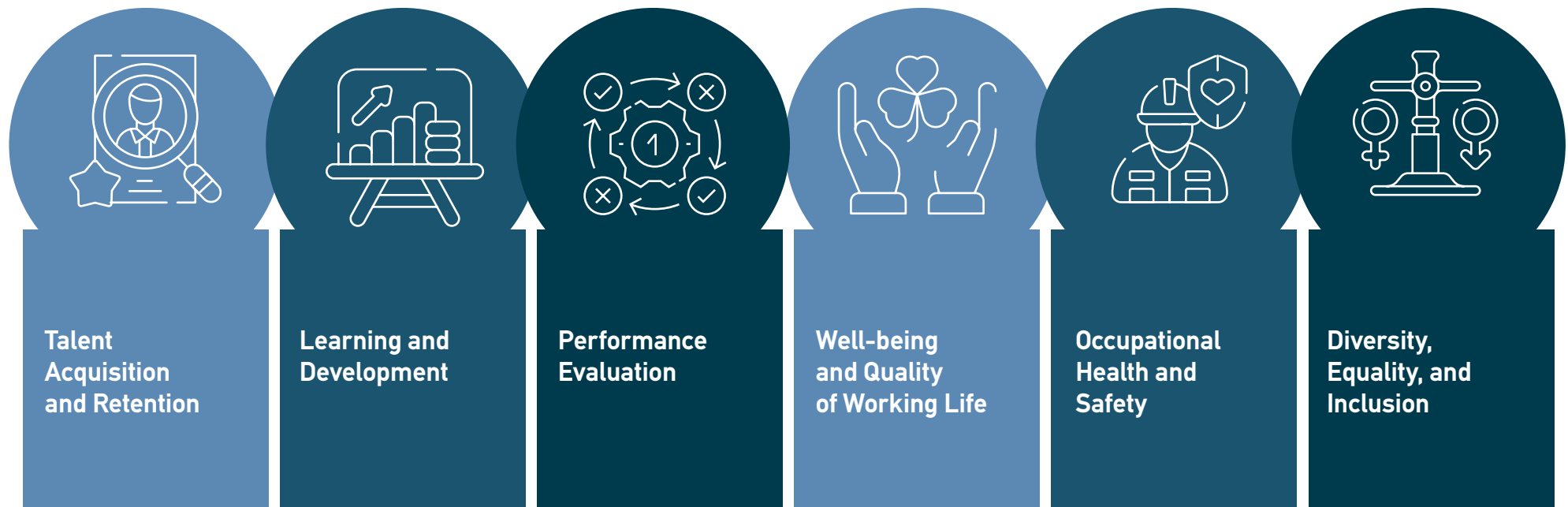
For SIDMA Steel, its people represent the core of its business operations and the compass guiding its sustainable transition. The Company systematically invests in fostering an environment that promotes equity, inclusion and well-being, ensuring a healthy work-life balance for its workforce. With a firm commitment to occupational safety and continuous training and upskilling, the Company cultivates a resilient workforce capable of responding to contemporary challenges and generating lasting shared value for both the Company and society.

SIDMA Steel is committed to ensuring safe and fair working conditions, underpinned by a culture of collaboration and open communication. Through targeted initiatives, the Company provides continuous learning and development opportunities, enhancing the competencies of its employees and laying the foundations for their professional growth at all levels. Developing a strong and resilient workforce, adapted to continuously evolving conditions, the Company succeeds in meeting present-day challenges and rising stakeholder expectations, creating value both within the organisation and in the broader society in which it operates.



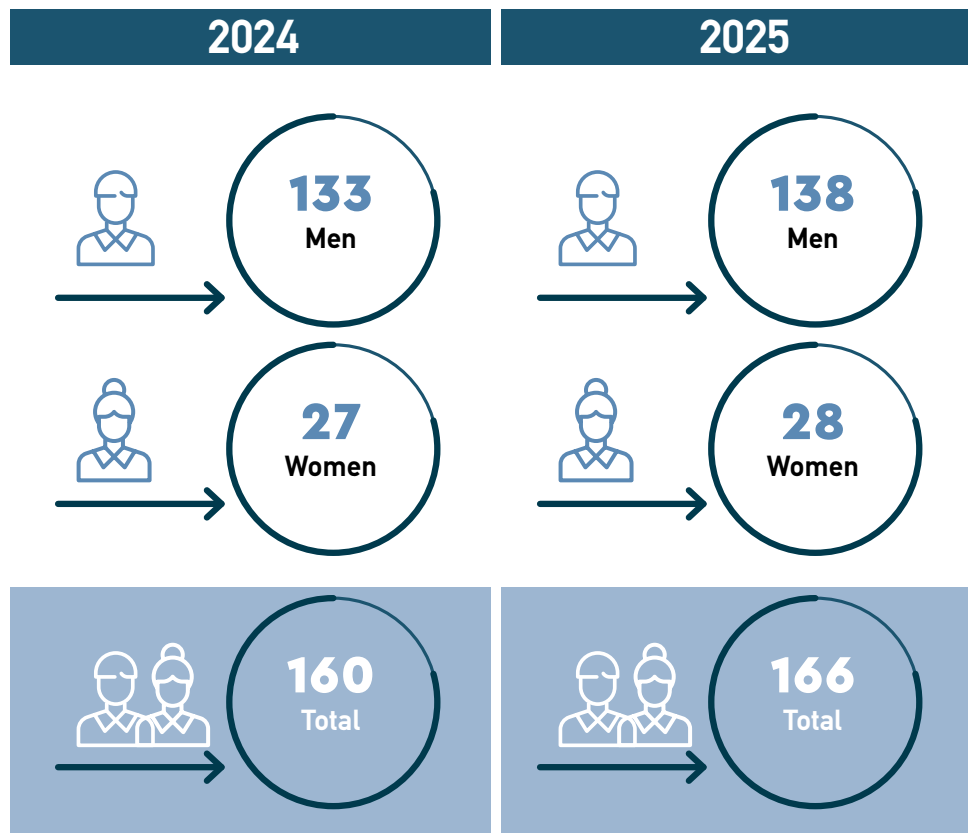
Key Pillars of Human Capital Management

The Company strategically focuses on shaping a modern working environment that empowers its people, placing emphasis on three core pillars: learning and skills development, attraction and retention of talented professionals, and enhancement of employee engagement and well-being.

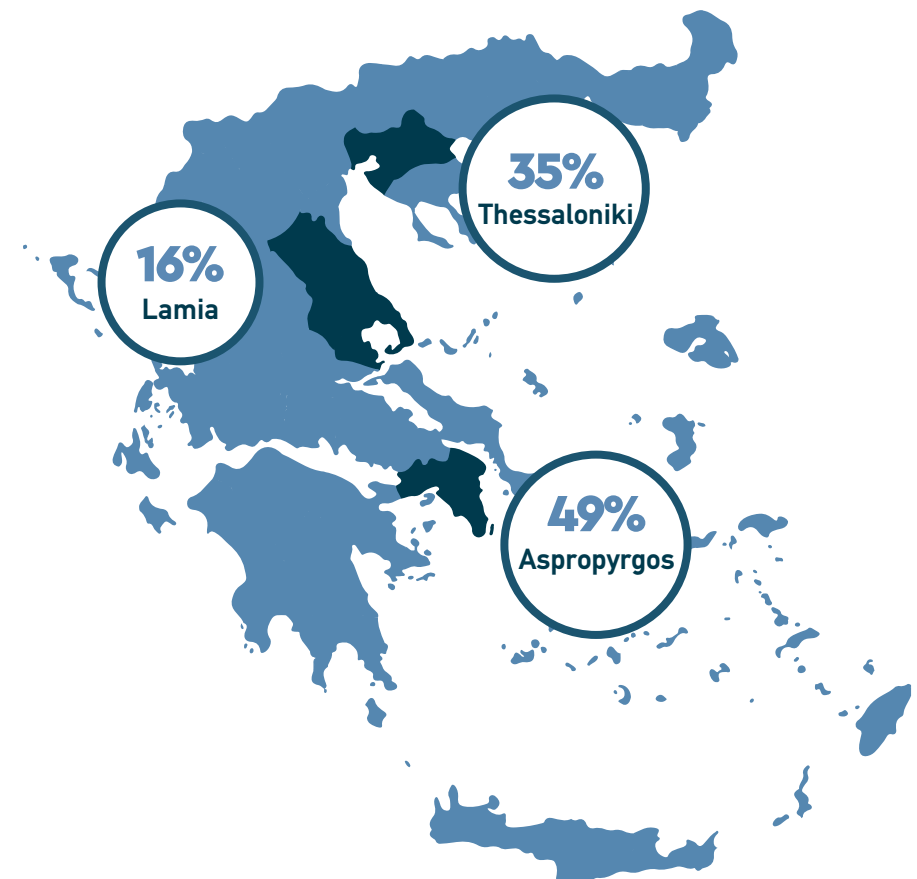


The Company in Numbers

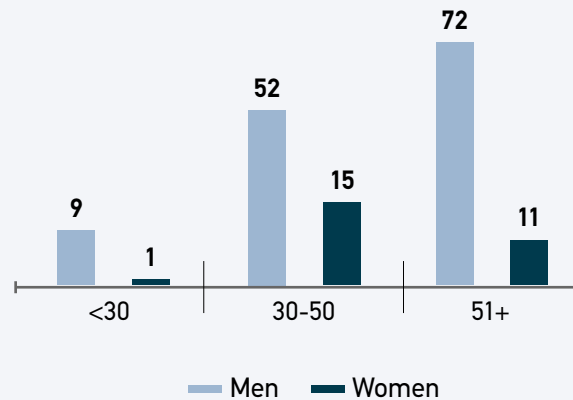
In 2025, **SIDMA Steel's** total workforce stood at **166 employees**, maintaining a strategic presence at key locations across Greece. The Company strengthens local employment in the communities where it operates, with the geographical distribution of personnel as follows: **49%** in Athens (Aspropyrgos), **35%** in Thessaloniki and **16%** in Lamia.



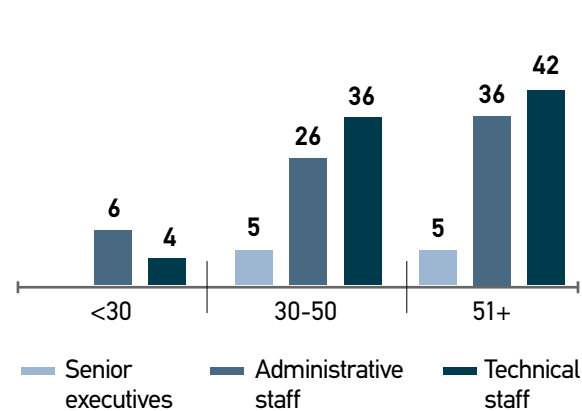
2025 Geographical Distribution of Employees



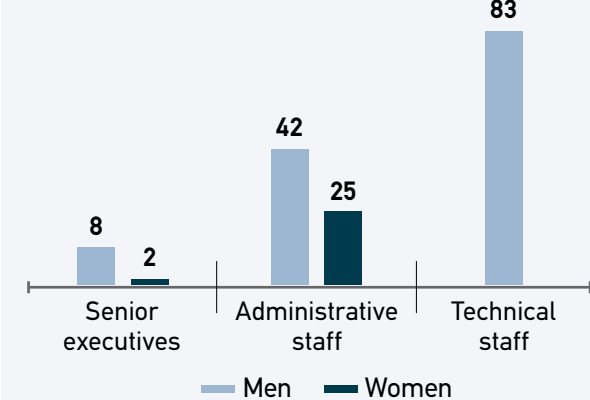
**Employee Analysis
per gender and age 2024**



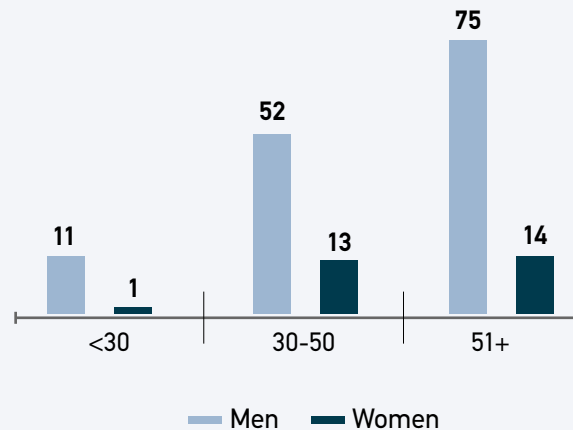
**Employee Distribution
per age 2024**



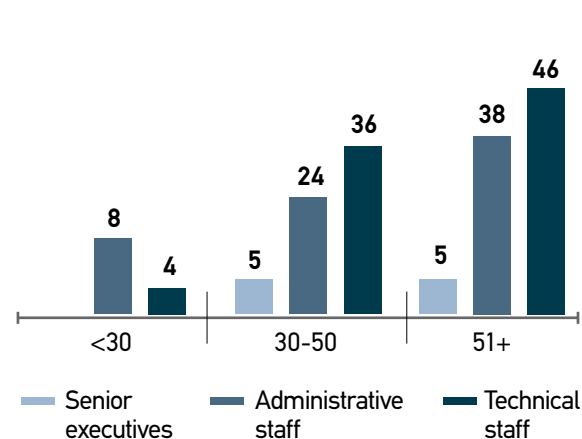
**Employee Distribution
per gender 2024**



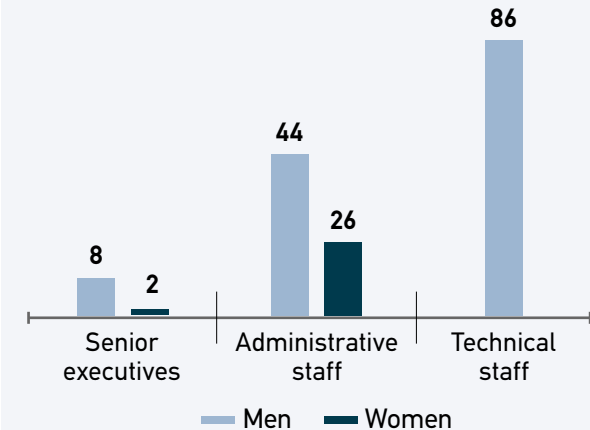
**Employee Analysis
per gender and age 2025**



**Employee Distribution
per age 2025**



**Employee Distribution
per gender 2025**



SIDMA Steel is committed to workforce stability and employment security, with 100% of its employees engaged under full-time and open-ended contracts.

Safeguarding Human Rights

The Management of SIDMA Steel is unequivocally committed to the protection of human rights, as defined by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organization (ILO). With full respect for diversity, the Company demonstrates zero tolerance for any form of discrimination, forced labour or child labour.

All labour activities are based on voluntary engagement and are fully aligned with internationally recognised standards. Through its established Human Rights Policy, SIDMA Steel promotes respect for and protection of individual freedoms both within the organisation and across its entire value chain, aiming to raise awareness among its employees, suppliers and business partners.

Inclusion and Respect for Diversity

SIDMA Steel fosters a working environment grounded in diversity, equity and inclusion.

The Company recognises that the diversity of its people is one of the key drivers contributing to value creation, enhanced productivity and performance, as well as

strengthened corporate reputation and credibility. Through the policies, procedures and practices it develops and implements, as well as the initiatives it undertakes, the Company seeks to establish the appropriate framework and conditions for a supportive environment that advances inclusion, equity and diversity.



Equal Opportunities and Fair Treatment

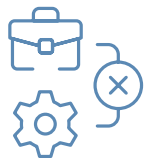
SIDMA Steel is committed to ensuring equal opportunities, implementing practices that promote fair and merit-based treatment at all stages: from talent attraction and selection, through to training, performance appraisal and professional development. The Company ensures that all criteria are transparent and objective, excluding any form of discrimination on the grounds of gender, age, nationality or any other protected characteristic.

At the same time, through its "open-door" policy, employees are encouraged to express themselves freely, actively contributing to fostering a working

environment built on acceptance and mutual trust. Through the clearly defined framework of its Code of Business Ethics and Conduct, Management guarantees that all members of the Company's workforce are assessed exclusively on the basis of their qualifications, competencies and achievements.

In this context, SIDMA Steel has developed a Diversity Policy aimed at strengthening inclusion across all levels of the organisation.

Specifically, its strategy focuses on three core pillars:



Raising awareness and ensuring the commitment of employees and business partners to the respect and protection of human rights, across all areas of business activity



Promoting and strengthening the principles of Diversity, Equity and Inclusion



Recognising the importance of promoting and implementing best practices relating to the adoption and embedding of the principles of Diversity, Equity and Inclusion at all organisational levels

Zero Tolerance for Violence and Harassment

At SIDMA Steel, ensuring a working environment free from all forms of violence and harassment is a fundamental prerequisite for the safety and well-being of its workforce. In this context, fostering a culture that promotes trust and dignity contributes to creating an environment where all individuals feel safe and protected.

The Company's Anti-Violence and Anti-Harassment Policy is designed to prevent and address such incidents, with Management committed to maintaining a working environment in which the dignity of every individual is protected and respect for their personal integrity is guaranteed.

Talent Attraction and Retention

SIDMA Steel systematically invests in its human capital. Strengthening the Company with capable and skilled professionals is a standing priority and a continuous objective. Through carefully designed, targeted and transparent selection processes, the Company aims to recruit professionals who share its vision and values. A sound talent attraction and selection process is ultimately what builds relationships of trust and lays strong foundations for the long-term integration of new employees into the organisation.

The recruitment process is underpinned by transparent, merit-based and evidence-based criteria, with the objective of identifying and selecting the most qualified candidates to join the Company. SIDMA Steel approaches talent attraction and selection as a strategically significant process, designed to ensure the alignment of business needs with the right human capital, while enhancing long-term organisational value. More specifically, the following are taken into consideration:

Systematic assessment of workforce needs

Clear definition of roles, responsibilities and required qualifications and skills

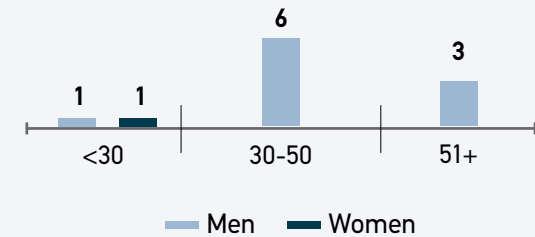
Labour market research and analysis

Development of competitive and attractive total remuneration packages

**Staff recruitment
per gender and age 2024**



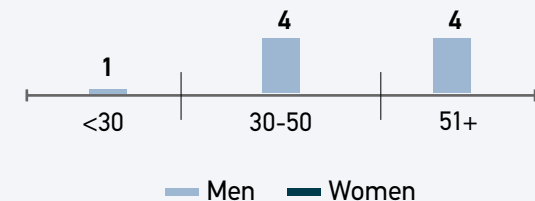
**Staff departures
per gender and age 2024**



**Staff recruitment
per gender and age 2025**



**Staff departures
per gender and age 2025**



In 2025, the total staff departure rate stood at **5.4%**, while the voluntary departure rate stood at **4.8%**.

Education and Development

SIDMA Steel recognises that in a continuously evolving environment, continuous learning is an essential prerequisite for maintaining its competitive advantage. Enhancing the knowledge and competencies of its people ensures optimal responsiveness to present-day business

requirements, while fostering a culture of lifelong learning.

In this context, the Company invests in modern and flexible learning programmes - both short-term and long-term - covering a broad

spectrum of technical and managerial subjects. Its objective is the continuous empowerment of its workforce, enabling the organisation to evolve organically alongside its people, while strengthening their readiness to meet the challenges of the industry.

Learning and Development Strategy Pillars

SIDMA Steel's training and development programmes are structured around three core pillars



Structured Onboarding and Learning Framework:

Implementation of a unified learning and integration framework for the entire workforce, ensuring the smooth onboarding of new members and their immersion in corporate culture and values.



Leadership and Governance Development:

Continuous empowerment of executives and members of the Board of Directors through specialised seminars, with emphasis on current market trends and corporate governance best practices.



Flexible Skills Development Initiatives:

Design of targeted upskilling and reskilling actions that accompany employees at every stage of their career, focusing on the enhancement of both their technical and soft skills.

Induction Training

SIDMA Steel implements a comprehensive Onboarding and Induction Programme, providing new employees with the necessary tools and continuous support for their smooth integration into the organisation. The objective of the programme is to facilitate their rapid familiarisation with processes, responsibilities and corporate culture.

The induction training programme comprehensively covers the following areas:

Corporate Identity: The Company's structure, organisation, products, services and markets in which it operates.

Vision and Values: An overview of the philosophy and principles that underpin the Company's operations.

Specialised Training: Provision of the required technical knowledge and tools specific to each role.

Regulatory and Compliance Framework: Briefing on Internal Regulations, Policies and Codes of Business Conduct.

Labour Rights, Obligations and Occupational Safety: Briefing on employee rights, obligations and occupational health and safety protocols in the workplace.

3,018.5
Training hours

98
Training seminars

+42%
Increase
in training hours
compared to 2024

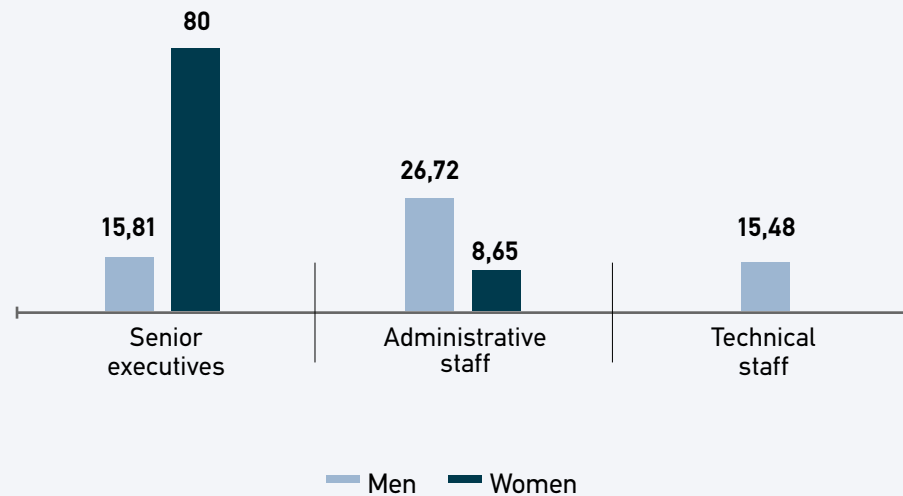
18.1
Average number
of training hours
for employees

13.7
Average number
of training hours
for women

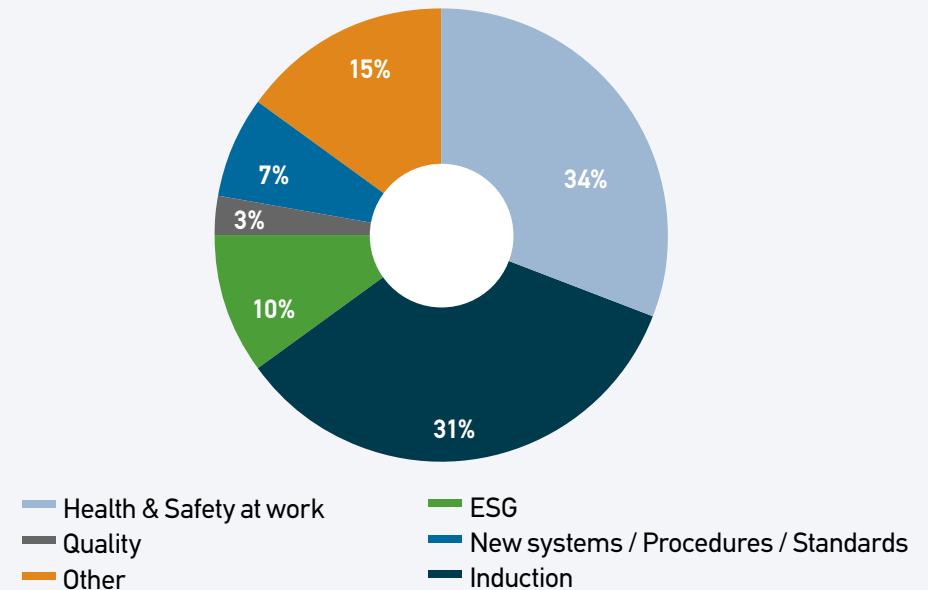
19
Average number
of training hours
for men

As part of its new employee communication and integration efforts, SIDMA Steel has developed a dedicated New Employee Handbook — a practical reference guide that provides essential information and addresses frequently asked questions from new members of the workforce, while helping them familiarise themselves with the organisation.

Average number of training hours
per hierarchical level 2025



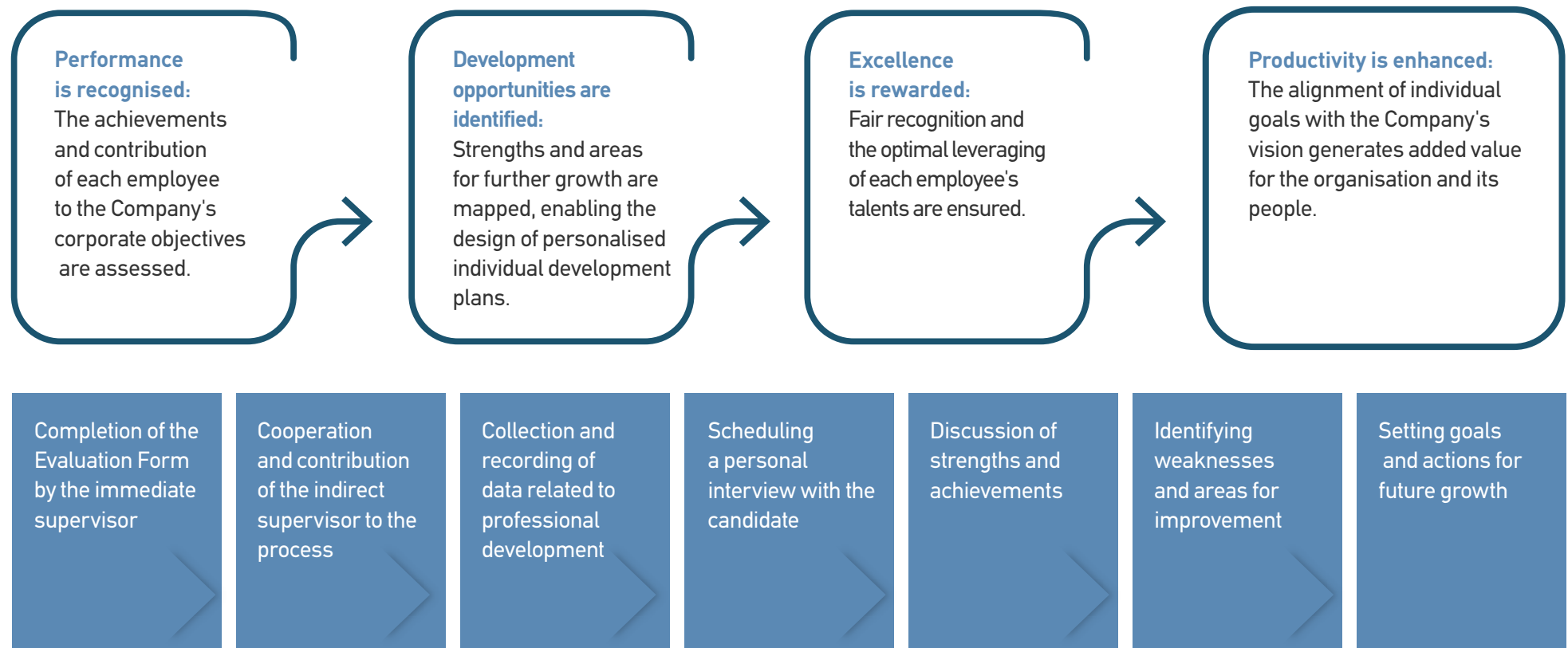
Training topics (%)



Performance Appraisal

The continuous development and professional growth of its people is a primary commitment for SIDMA Steel. The workforce performance appraisal process is conducted systematically on an annual basis, functioning as a meaningful feedback and empowerment mechanism.

Through the appraisal process, which is grounded in transparent and merit-based criteria:



Employee Benefits and Recognition

SIDMA Steel recognises that the provision of supplementary benefits represents a meaningful investment in its people. These benefits contribute to enhancing employee satisfaction, sense of security and engagement, fostering a supportive working environment that promotes productivity and well-being. More specifically, the Company consistently offers a comprehensive total benefits package, which includes:



Private health insurance,
fully funded by the Company



Coverage of inpatient
and outpatient care for
employees' family members



Psychological support
helpline for employees and
their family members



Provision of meal
vouchers



Gifts for employees' children
upon admission to Higher
Education Institutions



Christmas events and gifts



Monetary gift upon marriage



Monetary gift upon
the birth of a child

Promoting Physical and Mental Health

SIDMA Steel actively promotes the health, work-life balance and emotional resilience of its people. Recognising that employee well-being is inextricably linked to their personal and professional development, the Company systematically invests in psychological support and empowerment initiatives. In this context, through its partnership with Ergo Well-being, the Company provides its employees and their families with a 24-hour Psychological and Counselling Support Helpline. This service ensures immediate, confidential and meaningful support for any need that may arise, creating a safety net that strengthens mental health and emotional stability across the entire organisation.

Commitment to Two-Way Communication

At SIDMA Steel, communication is not merely an operational function, but the "pulse" that sets the pace and drives the energy of the organisation's development. The Company seeks to create the conditions for open, direct and authentic communication, in which trust is cultivated and the sense of belonging is strengthened. Through its "open-door" policy and regular information updates,

the Company ensures that information flows transparently and that every employee's voice is heard.

In addition, the Company operates a grievance mechanism aimed at the prompt identification and effective resolution of issues that may arise, while employee satisfaction surveys are conducted regularly.

"Open-door" policy

Email

Corporate events

Company newsletter

Complaint Submission Process

Complaint Reporting Portal

Employee Satisfaction Survey

Intranet



Occupational Health and Safety

04

Our Contribution to the UN Sustainable Development Goals (SDGs)



Our Approach

At SIDMA Steel, the occupational health and safety of its people, business partners and all visitors to its facilities, is a non-negotiable priority and an integral element of its operational culture. The protection of human life and physical integrity is embedded in the design of every activity, with the overarching objective of creating a working environment free from hazards and work-related incidents



Safety as a Daily Responsibility and Commitment

The Company's approach is grounded in the prevention and systematic management of occupational hazards, particularly across its production facilities. This commitment is operationalised through the implementation of a comprehensive Occupational Health and Safety Management System, certified to the international standard ISO 45001:2018.

The Company's occupational safety strategy focuses on the following pillars:

- **Fostering a Prevention Culture:** Through continuous training and awareness-raising, the Company empowers its workforce so that safety becomes a personal responsibility for every individual.
- **Systematic Performance Monitoring:** Key Performance Indicators (KPIs) are rigorously tracked, enabling the prompt identification of areas for improvement and the implementation of corrective actions.
- **Documented Procedures:** Strict work protocols and regular inspections are implemented, ensuring the continuous improvement of safety standards across all operational levels.



Occupational Health and Safety Policy

SIDMA Steel is committed to providing a safe working environment and to promoting the health and safety of its employees and all those who work with it, including customers, suppliers, contractors, subcontractors, business partners and visitors.

The primary objective of SIDMA Steel is "Zero incidents and zero occupational diseases". To achieve this objective, the Company requires all employees and business partners to:

- Foster a culture in which all work-related injuries and illnesses can and must be prevented,
- Strictly comply with applicable legislation and fully implement all Company standards, guidelines and procedures relating to occupational health and safety,
- Systematically identify, assess and regularly update potential health and safety hazards across the full scope of their business activities, and implement preventive measures to mitigate them,
- Report and thoroughly investigate all incidents (accidents, near-misses and unsafe conditions), and implement appropriate corrective and preventive actions to avoid recurrence,

- Communicate all occupational health and safety matters openly and transparently to all relevant parties and stakeholders,
- Recognise the significance of the human factor in occupational health and safety matters, and provide continuous training to support the development of occupational health and safety knowledge and competencies among employees and business partners, while encouraging their consultation and active participation in all occupational health and safety matters,
- Provide safe working conditions for the prevention of occupational injuries and diseases,
- Continuously improve occupational health and safety performance by engaging all relevant stakeholders in this effort, and embed health and safety as a key element across the full spectrum of their activities and corporate culture.

Employees and business partners shall be committed to protecting Health and Safety "everywhere and at all times" as a prerequisite for continued employment and collaboration.

As part of its continuous improvement efforts and digital transformation agenda, SIDMA Steel has developed and operates an internal digital Occupational Health and Safety platform, known as the H&S Portal.

Through the H&S Portal, all relevant reports are recorded and monitored - including inspections, employee observations and incident notifications - while the platform supports the assignment and tracking of corrective actions for their timely resolution. In addition, the document upload functionality enhances the effective implementation of required actions.

The digitalisation of processes contributes to improved monitoring and oversight, comprehensively upgrading the Company's overall Occupational Health and Safety management performance.

Occupational Health and Safety Management System

The management of Occupational Health and Safety at SIDMA Steel is grounded in a comprehensive Management System, which supports the systematic identification of hazards, assessment of risks and investigation of incidents. Particular emphasis is placed on root cause analysis of every incident and on the implementation of corrective and preventive actions. Through a continuous feedback and review

process, the Company consistently improves its practices and enhances safety standards across all workplaces.

Within the framework of the Management System, specific procedures and actions are implemented, through which the Company ensures, among other things, the following:

Ensuring that all employees are provided with appropriate Personal Protective Equipment (PPE)



Conducting regular and systematic inspections by specially trained and authorized personnel



Installation of clear and appropriate signage throughout the facility



Continuous updating and compliance with applicable laws, international standards, and industry best practices



Development and implementation of a targeted action plan for the effective management of emergencies



Occupational Health and Safety Risk Management and Prevention

Occupational Health and Safety Officers

Prevention is a fundamental principle of the Company's approach to Occupational Health and Safety. In this context, the Company's Safety Technicians and Occupational Physicians play a pivotal role across its facilities, actively contributing to the establishment and maintenance of a safe and healthy working environment.

Occupational Health and Safety Risk Assessment

SIDMA Steel places particular emphasis on the prevention and early identification of occupational hazards, implementing systematic risk assessment procedures across the full scope of its activities and processes. Through these assessments, potential hazards are identified and appropriate prevention and control measures are determined, while corrective actions are taken promptly where required to ensure a safe working environment.

The risk assessment process is based on a combination of qualitative and quantitative data, including historical accident records, near-miss reports, incident analyses and findings from internal and external inspections and audits.

Particular importance is placed on the active participation of employees in the hazard identification and risk assessment process, reinforcing consultation and leveraging experiential knowledge from day-to-day operations, with the objective of implementing more effective and targeted control measures.

The risk categories identified by the Company are divided into:

Indirect or direct accident hazards
that create the conditions leading to an accident

Non-accident-related risks
that involve organizational, psychological, and ergonomic factors, which do not lead to accidents but affect the mental and physical health of workers in the short or long term

The Written Occupational Risk Assessment (WORA) is a core tool for the systematic identification, monitoring and evaluation of hazards that may arise in the working environment. The assessment is conducted for each workstation and facility in accordance with prescribed procedures, ensuring full compliance with applicable regulatory requirements.

The WORA is updated whenever changes occur in equipment, processes or working conditions, and is reviewed as part of the annual Occupational Health and Safety Management System review. This ensures its continuous adaptation to actual operating conditions and the effective prevention of occupational hazards.

Incident Management

SIDMA Steel implements an incident management procedure that is activated for every incident, regardless of severity. Upon occurrence of an incident, the Safety Technician and Occupational Physician are immediately notified in order to initiate the investigation process.

A detailed examination of the circumstances under which the incident occurred is then conducted, with the objective of identifying the root causes and contributing factors. The findings are recorded in the relevant Incident Analysis and Investigation Form and communicated to Management and the Company's Human Resources Department. Based on the findings, targeted corrective and preventive actions (CAPA) are designed and implemented, with the aim of strengthening prevention and avoiding the recurrence of similar incidents in the future. This process contributes to the continual improvement of the OHS Management System and to the reinforcement of a safety culture within the organisation.



Safety Month

In recent years, SIDMA Steel has been organizing "Safety Month" across all its facilities, giving its employees the opportunity to participate in awareness and training programs on specific health and safety topics

Workforce Training and Awareness

Fostering a strong prevention culture is the cornerstone of SIDMA Steel's day-to-day operations. The Company systematically invests in raising awareness among its people, promoting open dialogue that encourages the sharing of experiences and the active participation of all.

Its approach is grounded in the principle that safety is the result of collaboration and continuous learning.

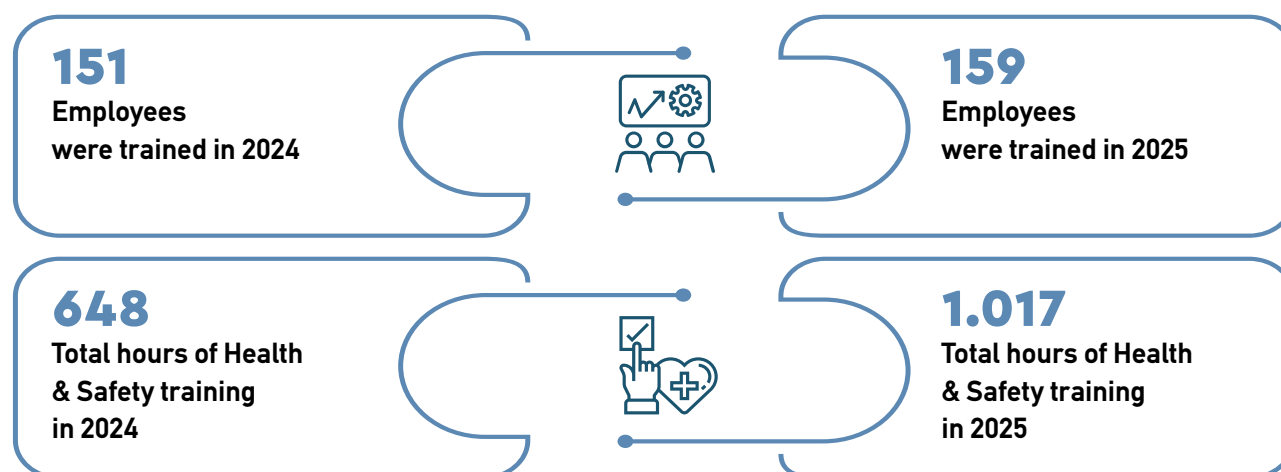
In this context, the Company:

- Implements **structured training programmes** covering every hierarchical level of the organisation.

- Tailors training content to the **specific requirements** of each role and workstation.
- Strengthens employees' **readiness** to promptly identify and effectively manage any potential hazard.

In this way, the Company ensures that knowledge is translated into safe daily practice, safeguarding the health of its entire workforce.

In 2025, a total of 34 seminars were conducted on Occupational Health and Safety topics, attended by the Company's entire workforce.



Health and Safety Good Practices

Photography Competition: "Occupational Health and Safety – Zero Accidents"

With the objective of further raising awareness and fostering the active participation of its people, SIDMA Steel organised an innovative Photography Competition. Under the central theme "Good Practices – Zero Accidents", employees were invited to capture, through their own lens, the importance of prevention in everyday working life.

This initiative aimed to highlight positive safety behaviours and best practices that safeguard employee health, conveying the powerful message that a world free from work-related accidents is achievable.

The competition served as a creative communication channel, reinforcing the collective commitment to fostering a prevention culture and the continuous pursuit of the Zero Accidents target.

Target-Setting and Ongoing Improvement

The continuous enhancement of Health and Safety performance is a fundamental commitment. Beyond the strategic objective of zero accidents, SIDMA Steel sets specific quantitative and qualitative targets that enable the systematic monitoring of progress and the planning of targeted interventions.

These targets are fully aligned with applicable

legislation and the guidelines of international standards, ensuring a holistic and proactive approach to risk management.

Inspection and Audit System

A core pillar of the Company's strategy is its structured programme of routine and unannounced inspections. Through this programme:

Through them:

Working conditions and compliance with safe behaviour protocols are assessed.

Potential hazards are identified at an early stage and fire safety systems are inspected.

The correct implementation of internal policies and procedures is verified.

Inspections are carried out by competent personnel in collaboration with Safety Technicians and Occupational Physicians, as well as by external auditors. Findings are recorded in detail and

translated into Action Plans, ensuring that every identified issue is addressed promptly and effectively within the framework of the Management System.

Fire Safety Training

SIDMA Steel systematically invests in strengthening its safety culture by implementing training initiatives designed to enhance employee readiness for emergency situations.

In this context, fire safety and safe evacuation training was conducted across all facilities, with the objective of refreshing the competencies of the Fire Safety Team and providing induction training for new employees. Participants were familiarised with the fundamental principles of fire prevention and response, the correct use of firefighting equipment and evacuation procedures, thereby strengthening operational readiness and workplace safety.

Digital Transformation and Prevention Culture

SIDMA Steel places Occupational Health and Safety at the forefront of its priorities, continuously strengthening its practices through modern digital tools. The deployment of specialised applications enhances the recording and management of safety matters, while the digitalisation of inspections and incident reports enables effective data analysis and the implementation of targeted control measures. In parallel, the Company invests in raising employee awareness through the thorough investigation of accidents and near-misses, reinforcing its prevention culture and promoting the adoption of safe behaviours across the organisation.

Occupational Health and Safety Performance Indicators

SIDMA Steel systematically monitors and records its Occupational Health and Safety performance. The table below presents the Company's OHS performance data for 2024 and 2025.

	2024	2025
Frequency Rate		
LTIFR (Lost Time Injury Frequency Rate) of employees	5.8	3
LTIFR (Lost Time Injury Frequency Rate) of subcontractors	0	0
Incident Severity Rate		
LTISR (Lost Time Incidents Severity Rate) of employees	425.1	0
Absenteeism Rate		
AR (Absenteeism Rate) of employees	1.84%	3.11%
AR (Absenteeism Rate) of subcontractors	0.3%	1.93%
Incidents		
Number of work-related accidents	2	1
Occupational Sickness		
Number of occupational sickness	0	0

* LTIR (Lost Time Injury Rate): $(\text{Number of lost-time incidents} / \text{Total hours worked}) \times 10^6$

LTISR (Lost Time Injury Severity Rate): $(\text{Number of workdays lost due to work-related accidents} / \text{Total hours worked}) \times 10^6$

AR (Absenteeism Rate): $(\text{Number of days absent from work due to any incapacity} / \text{Total working person-days}) \%$

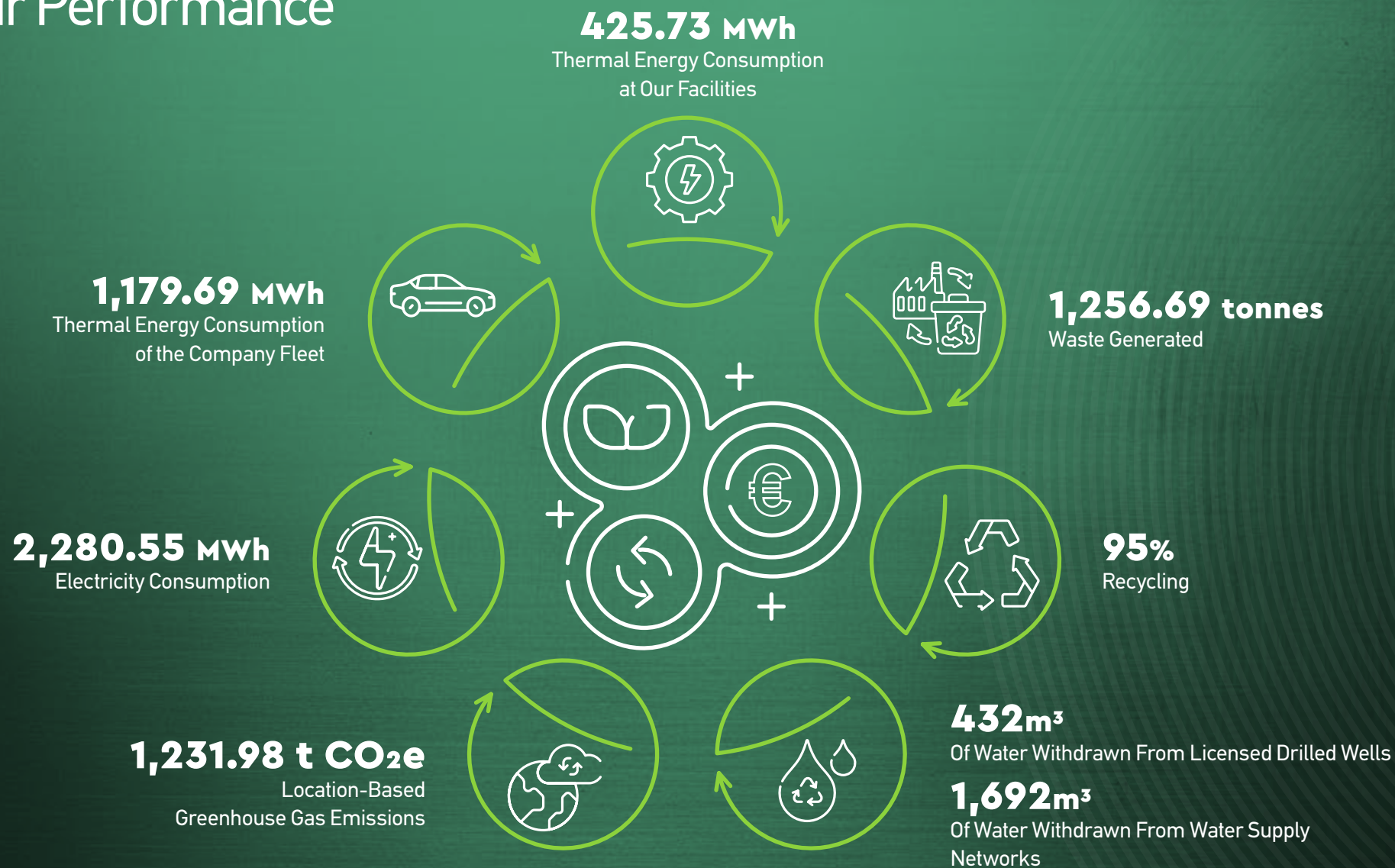
Environmental Responsibility and Climate Action

05

Our Contribution to the UN Sustainable Development Goals (SDGs)



Our Performance



Sustainable Development and Environmental Protection

SIDMA Steel has integrated the principles of Sustainable Development into its operational framework and business activities, recognising them as a fundamental prerequisite for its long-term growth and resilience. Within this context, environmental protection constitutes a core pillar of its corporate strategy.

The Company's Sustainable Development Policy is aligned with its core values, namely responsibility, integrity, transparency, efficiency, and innovation. It is

overseen by the Board of Directors and implemented by Senior Management, which is committed to ensuring its application across all levels of operations.

In particular, in the environmental sector, the Company applies the precautionary principle and adopts circular economy practices, promoting the optimal management of natural resources, metal recycling, and the utilisation of secondary raw materials.

Within this context, SIDMA Steel:

Ensures compliance with the applicable regulatory framework and relevant standards and procedures

Promotes open and two-way communication with stakeholders

Provides a safe and healthy work environment

Seeks to reduce its environmental footprint through responsible practices

Strengthens collaboration with local communities

Creates long-term value for stakeholders

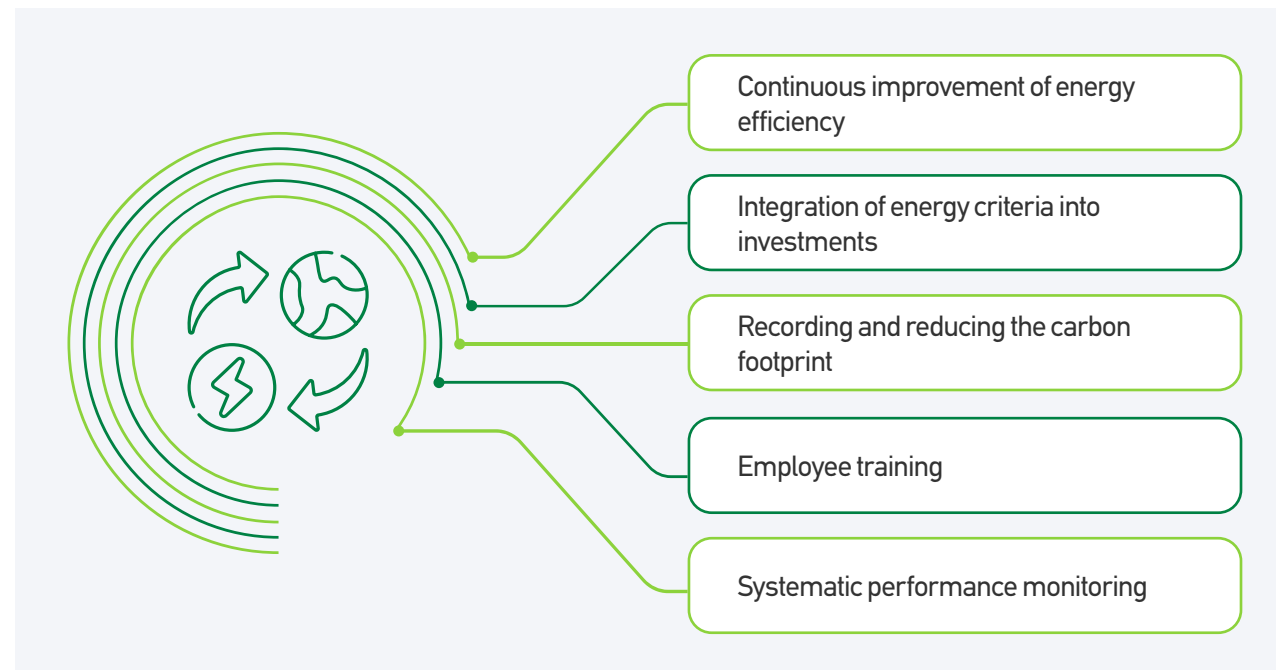
Energy Management and Energy Efficiency

The Energy and Climate Change Policy of SIDMA Steel constitutes a key pillar of its environmental strategy and establishes the framework for the management of energy and related greenhouse gas emissions. The Policy is aligned with the applicable regulatory framework and international guidelines, incorporating the principles of prevention, responsible resource consumption, and

continuous improvement.

The Company systematically monitors its energy performance and related emissions, setting targets and implementing initiatives that contribute to the gradual transition towards a more sustainable energy model, while simultaneously enhancing resilience and long-term value creation.

Through its Energy and Climate Change Policy, the Company is committed to:



Investing in Sustainable Energy

SIDMA Steel consistently invests in green energy, strengthening electricity generation from Renewable Energy Sources through the installation of photovoltaic systems in Athens and Thessaloniki.



Annual electricity consumption from renewable energy sources in 2024 was 1,222.74 MWh, while the corresponding consumption for 2025 was 1,105.32 MWh.

In 2024, SIDMA Bulgaria also commissioned a large-scale photovoltaic plant, installed entirely on the Company's rooftop. The impressive 450 kWp system highlights the Company's commitment to sustainable

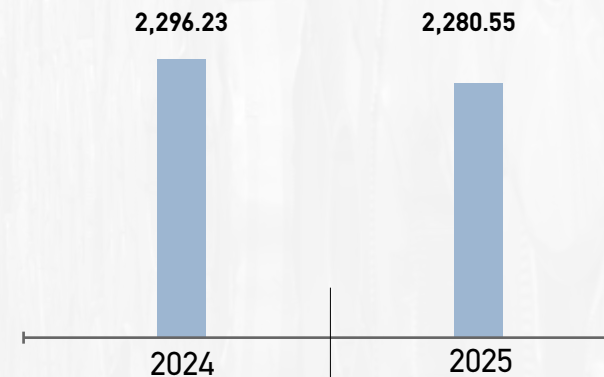
development, while significantly enhancing its energy independence. The system generated 455.349 kWh in 2025, accounting for 75% of the Company's total annual energy consumption.

Electricity Consumption

The Company's electricity consumption relates to part of its production facilities, as well as its administrative and support activities. SIDMA Steel systematically monitors consumption at facility level, with the aim of optimising energy performance and promptly identifying energy-saving opportunities.

In 2025, a slight reduction in electricity consumption was recorded, as a result of the continuous implementation of targeted energy efficiency initiatives and the optimisation of production processes. At the same time, the Company is proceeding with the gradual upgrade of equipment and technologies, aiming to reduce energy consumption and the associated emissions.

Electricity Consumption (MWh)



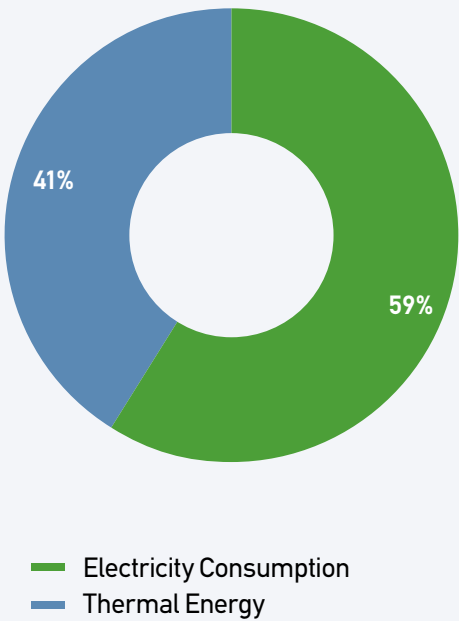
Thermal Energy Consumption

Thermal energy consumption is associated with the use of natural gas, heating oil, and transport fuels for the corporate fleet and the operation of production lines. The Company systematically monitors these consumption metrics, aiming to improve energy efficiency and mitigate its environmental impacts.

Thermal Energy (MWh)	2024	2025
Petrol	127.50	195.82
Diesel	1,160.68	1,097.64
Natural Gas	383.17	311.96
Total Thermal Energy Consumption (MWh)	1,671.35	1,605.42

In 2025, natural gas consumption decreased by 18.6% compared to 2024. As a result, total thermal energy consumption decreased by 4%, reflecting the strengthening of production activity. At the same time, the Company is evaluating alternative technologies and practices with the aim of reducing fuel consumption and related emissions.

Total Energy Consumption in 2025 (MWh)



Greenhouse Gas Emissions

SIDMA Steel applies a systematic approach to the recording and monitoring of Greenhouse Gas emissions, in accordance with the GHG Protocol and the GRI Standards.

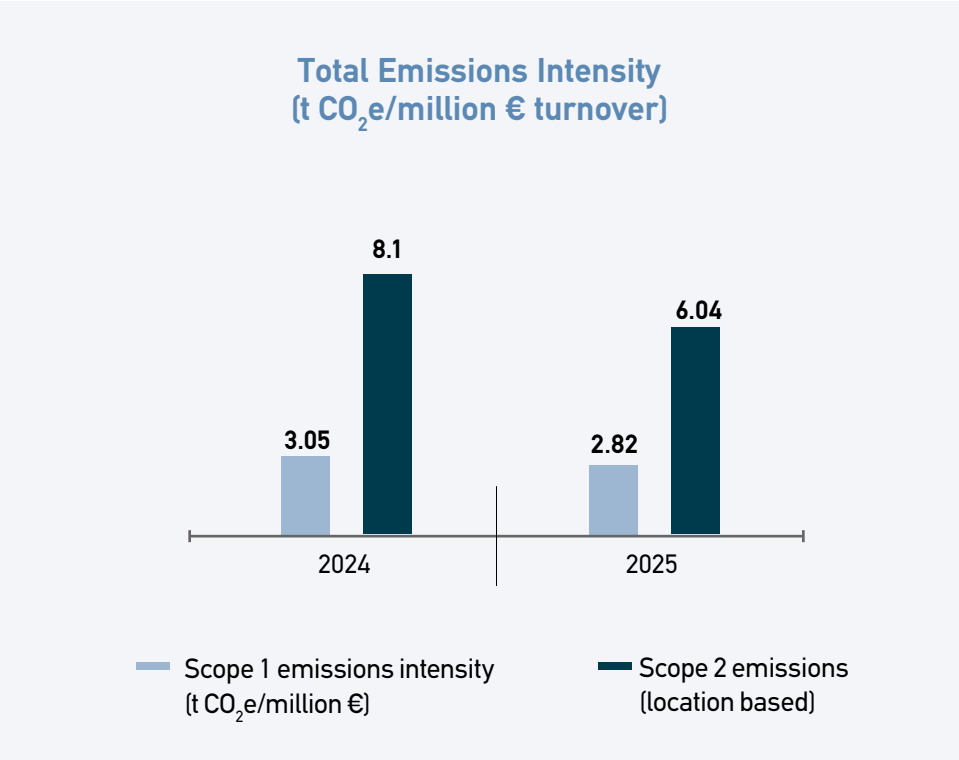
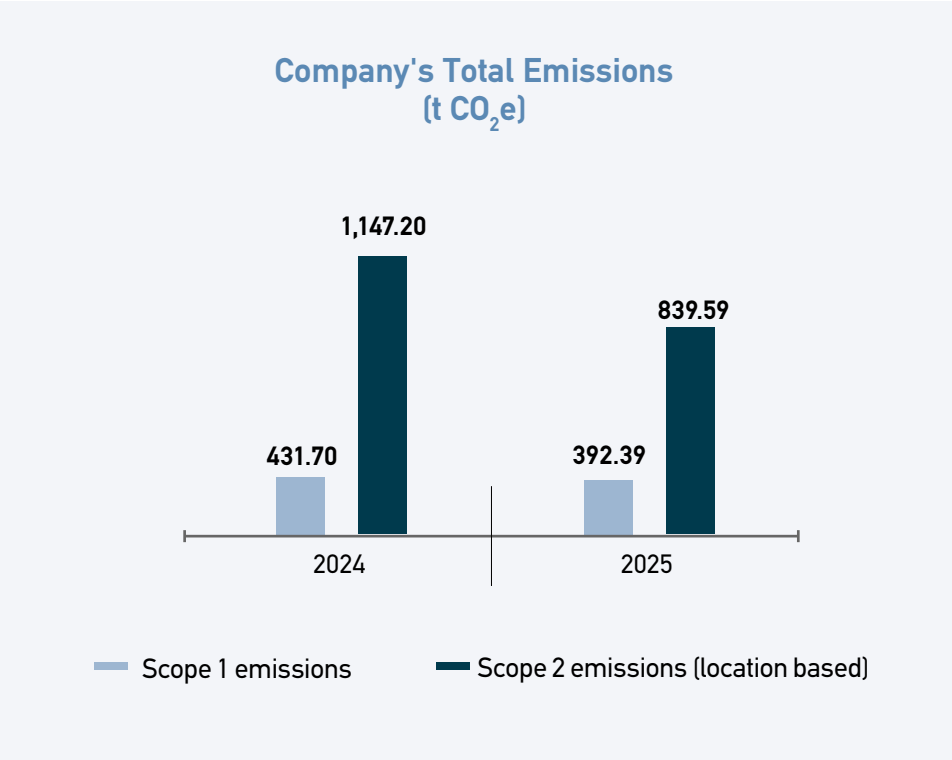
Emissions are classified into Scope 1 and Scope 2 categories.

- Scope 1 emissions (Direct emissions), relate to emissions generated from sources owned or controlled by the Company, such as fuel combustion in facilities and vehicles, as well as potential refrigerant leakages.
- Scope 2 emissions (Indirect emissions), relate to emissions associated with the generation of the electricity consumed by the Company and supplied through the grid.

In 2025, Scope 1 emissions decreased by 9%, due to reduced fuel consumption. Similarly, location-based Scope 2 emissions decreased by 22%, while market-based Scope 2 emissions decreased by 20%.

The table below presents the total consumption and emissions of SIDMA Steel.

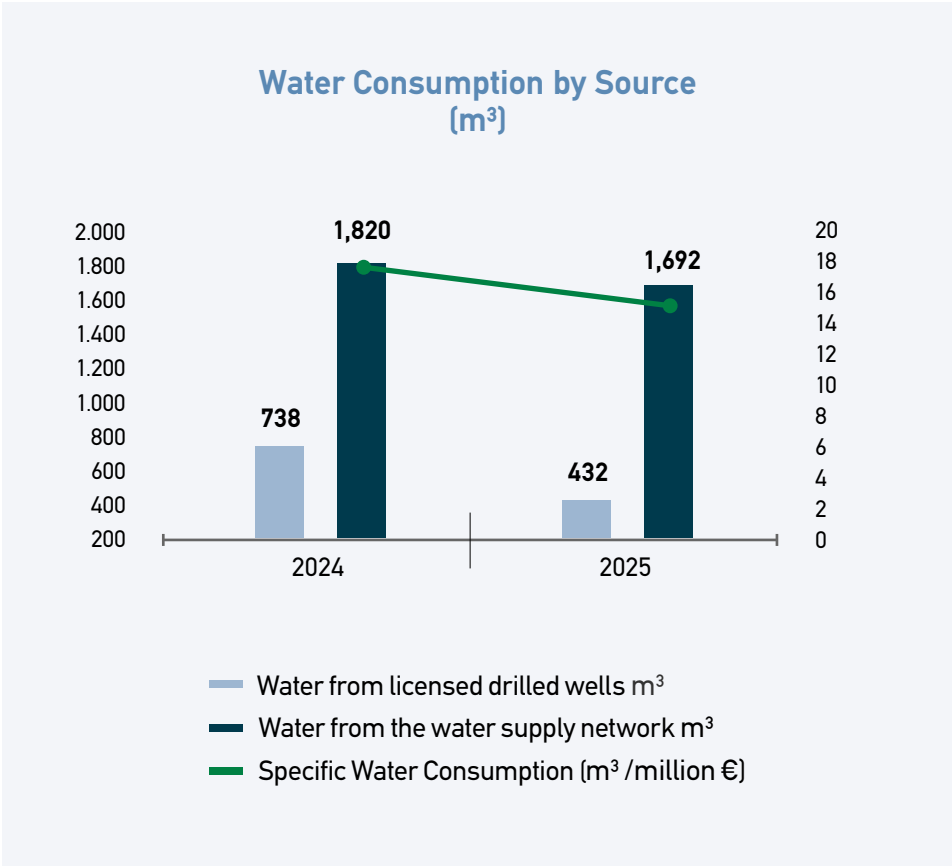
	2024	2025
Thermal Energy (MWh)	1,671.35	1,605.42
Electricity (MWh)	2,296.23	2,280.55
Total Energy Consumption (MWh)	3,967.58	3,885.97
Percentage of Energy from renewable sources consumed	21.38%	25.68%
Energy Intensity (MWh /million € turnover)	28	27.94
Energy generated from RES (MWh)	1,222.74	1,105.32
Scope 1 emissions (t CO ₂ e)	431.70	392.39
Location-based Scope 2 emissions (t CO ₂ e)	1,147.20	839.59
Market-based Scope 2 emissions (t CO ₂ e)	835.82	620.90
Total location-based emissions (t CO₂e)	1,578.90	1,231.98
Total market-based emissions (t CO₂e)	1,267.52	1,013.29
Scope 1 emissions Intensity (t CO ₂ e/million €)	3.05	2.82
Location-based Scope 2 emissions intensity (t CO ₂ e/million € turnover)	8.10	6.04
Market-based Scope 2 emissions intensity (t CO ₂ e/million € turnover)	5.90	4.46
Total location-based emissions intensity (t CO ₂ e/million € turnover)	11.14	8.89
Total market-based emissions intensity (t CO ₂ e/million € turnover)	8.94	7.29



Within the framework of this Sustainability Report, the emission and conversion factors related to energy and fuel consumption were sourced from the Greek Ministry of Environment and Energy and the Renewable Energy Sources Operator & Guarantees of Origin (DAPEEP). More specifically, for the conversion of fuel quantities into energy units and Scope 1 greenhouse gas emissions, the factors specified by the Greek Ministry of Environment and Energy for the National Climate Law (4936/2022) were utilised. For the conversion of electricity into emissions, the factors regarding Greece's residual energy mix, as well as the residual energy mix of the electricity supplier, were applied, as published annually by DAPEEP.

Water Resources Management

SIDMA Steel S.A. implements responsible water management practices, aimed at efficient use and reduction of losses. The approach includes monitoring consumption, maintaining infrastructure, and raising employee awareness, thereby ensuring compliance and performance improvement.



Waste Management and Recovery

SIDMA Steel implements circular economy practices, prioritising prevention, recycling, and reuse. In 2025, the total amount of waste generated remained stable, while hazardous waste decreased by 30.6%. In addition, recycling activities continued to be strengthened, with the share of non-recyclable waste amounting to only 5.01%.

Waste Management (tonnes)		2024	2025
 Hazardous Waste	Incineration	0.00	0.00
	Landfill	0.00	0.00
	Other Disposal Operations	15.50	17.34
	Total Hazardous Waste Directed to Disposal	15.50	17.34
	Preparation for Reuse	0.27	0.00
	Recycling	87.24	54.18
	Other Recovery Operations	0.00	0.00
	Total Hazardous Waste Diverted from Disposal	87.51	54.18
	Total Hazardous Waste	103.01	71.52
 Non-Hazardous Waste	Incineration	0.00	0.00
	Landfill	0.00	0.00
	Other Disposal Operations	55.35	45.66
	Total Non-Hazardous Waste Directed to Disposal	55.35	45.66
	Preparation for Reuse	0.00	0.00
	Recycling	1,172.98	1,139.51
	Other Recovery Operations	0.00	0.00
	Total Non-Hazardous Waste Diverted from Disposal	1,172.98	1,139.51
	Total Non-Hazardous Waste	1,228.33	1,185.17
Total Waste Generated		1,331.34	1,256.69
Percentage of Non-Recyclable Waste		5.32%	5.01%

Environmentally Responsible Product Design

Waste management is a key parameter already at the stage of product design and development within SIDMA Steel. Taking into account the importance of climate change and the increasing demands of stakeholders, the Company systematically assesses the compliance of its activities with the applicable regulatory framework and analyses the environmental impacts of its products and services.

Through the implementation of quality management systems and the adoption of international standards and certifications, the Company ensures that its processes and production methods are characterised by high levels of environmental responsibility, employee safety, and enhanced environmental awareness. At the same time, it promotes the development of products and services that improve efficiency and productivity, while also contributing to the reduction of environmental impacts.

As part of its sustainable development strategy, the Company has proceeded with the certification of its products in accordance with international environmental compliance standards. In recent years, it has further strengthened its environmental



performance by expanding certifications across the full range of products that may have an environmental footprint.

Since November 2023, SIDMA Steel has been a member of the German GEV organisation, offering products suitable for sustainable building certifications such as LEED, BREEAM, and HQM.

In addition, for all panel categories, the Company holds the EMICODE EC1PLUS certification, which

confirms extremely low emissions of volatile organic compounds (VOCs) and the safe use of products for both humans and the environment.

Furthermore, the Company enhances transparency and understanding of the environmental impacts of its products through the application of tools such as Life Cycle Assessment (LCA) and Health Product Declarations (HPD), assessing the life cycle of products from raw material sourcing through to their final disposal.

Our Social Contribution

06

Our Contribution to the UN Sustainable Development Goals (SDGs)



Our Contribution to Society

In an environment where social challenges are intensifying, SIDMA Steel recognises the value of social cohesion and solidarity as fundamental elements of sustainable development. Within this context, the Company systematically integrates the social dimension into its activities, encouraging the active participation of employees in initiatives with a positive social impact, such as volunteering actions and support for local communities and organisations. Through such initiatives, the Company strengthens its connection with society, fosters a culture of giving, and further enhances employee engagement. In this way, SIDMA Steel seeks to create long-term and meaningful value for society, responding dynamically to evolving needs.



The social responsibility of SIDMA Steel is structured around three main pillars:



Initiatives with Social Impact

Donation Drive for “the Solidarity Basket”

SIDMA Steel organised a collection of essential items to support the organisation “The Smile of the Child”, aiming to assist children and families in need. The initiative took place ahead of the Christmas holiday period, encouraging employee participation in the collection of basic goods such as baby care and personal care products, as well as school and creative materials. The response was particularly positive, highlighting the sense of solidarity and social awareness that characterizes the Company's people and contributing to the strengthening of the social fabric.



Young Creators and their Unique Inspirations

Building on the warm response to a similar initiative three years ago, SIDMA Steel repeated the action, giving employees' children the opportunity to express their creativity and present new artistic perspectives.

At the same time, it once again provided a platform for those who had participated in the past to share their new creations. All contributions were featured in the corporate newspaper “The SIDMA Times”, while each child received a symbolic gift.



World Mental Health Day

In the modern business environment, the success of a company is not measured solely by numbers, balance sheets, and market shares. SIDMA Steel S.A. recognises that employee well-being is a cornerstone of its sustainability and growth. At the same time, it acknowledges that daily challenges may lead to pressure, fatigue, or emotional strain. Within this context, the Company fosters a supportive working environment where mental health is approached with respect and is an integral part of the overall well-being of its people. It consistently highlights the importance of mental well-being as a key pillar of overall health, continuously communicating relevant initiatives and messages to employees with the aim of raising awareness and promoting education on mental health.

Tree Planting in Collaboration with “We4all”

SIDMA Steel actively contributes to the enhancement of the natural environment by implementing tree-planting initiatives in areas with increased needs. Through these initiatives, the Company addresses climate change while also empowering local communities.

In this context, it once again collaborated with We4all to promote a shared vision for a harmonious planet. Through this partnership, it contributes to actions with a meaningful and lasting environmental and social impact. With a consistent focus on the future, SIDMA Steel promotes a world where humans coexist harmoniously with nature, strengthening initiatives that support sustainability and the protection of the planet for future generations.

Activities of the SIDMA Running Team

The SIDMA Steel Running Team actively participates in a wide range of sports events, combining athletic activity with social contribution. Beyond its sporting performance, the team contributes to initiatives of social and charitable character, supporting initiatives that have a meaningful impact on society.

Among the significant participations undertaken by the team are the following:

- The Run in the Memory of Alkis Kampanos, where the team honoured the memory of the tragically lost Alkis.
- The 13th Chortiatis Trail Run (10 & 25 km), where registration fees contributed to supporting the “Greek Children’s Village” in Filyro, Thessaloniki, aiding children in need.
- The 11th “Autism - Hope” Charity Mountain Race in Thessaloniki, which supports the work of the respective organisation.
- The Alexandria Road Race (April 6, 2025, 10 km), which showcased the team’s dynamic

participation in one of the region’s most prominent sporting events.

- The races in the peri-urban forest of Seih Sou (May 11, 2025, 16 & 10 km), where team members participated in a demanding route, successfully completing their race in a unique natural environment.

This competitive season continued with intense activity, due to scheduled participations on Mount Olympus in June and July, confirming the team’s ongoing commitment both to sport and to social contribution.



Fostering and Developing Innovation



Collaboration with the Prom Racing Navios NTUA FSAE Team

SIDMA Steel actively supports the student team Prom Racing Navios NTUA FSAE Team, contributing to the development of innovative applications in the field of mechanical engineering and motorsport. Through this collaboration, the Company supplies high-quality steel, which is used in the construction of critical structural components. The reliability of the materials plays a decisive role in meeting the demanding safety and performance specifications of the Formula Student framework.

This initiative reflects the Company's commitment to supporting the next generation of engineers, strengthening the link between education and industry, and promoting innovation, know-how, and excellence. In this way, the Company contributes substantially to talent development and to the formation of a dynamic ecosystem of knowledge and technology.



"Information Security" Training Seminar for Strengthening Cybersecurity

With strong participation from employees across all facilities, a training seminar on "Information Security" was held on Wednesday, 19/11/2025. The seminar was organised in collaboration with executives from the Group's Information Security Directorate. The training was delivered by specialised professionals in the field of cybersecurity. As part of the initiative, participants had the opportunity to receive detailed information on cybersecurity matters, the modern threats and risks faced by SIDMA Steel S.A., as well as the most common cyberattack techniques, with particular emphasis on the role of the human factor and effective protection methods. In addition, the Company's Information Security strategy was presented and discussed, along with the critical contribution of every employee in strengthening the overall security level within the Company.

Responsible Leadership and Business Conduct

07

Our Contribution to the UN Sustainable Development Goals (SDGs)

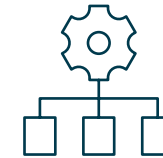




Our Strategic Approach

At **SIDMA Steel**, Corporate Governance goes beyond a formal set of rules and procedures and forms the foundation upon which the Company builds its relationships with shareholders, the Board of Directors, and all stakeholders.

At the same time, governance functions as the strategic pillar that defines the Company's direction and priorities. Through a framework of transparency and accountability, it ensures sound decision-making, safeguarding the interests of its shareholders while strengthening its international reputation and market trust.



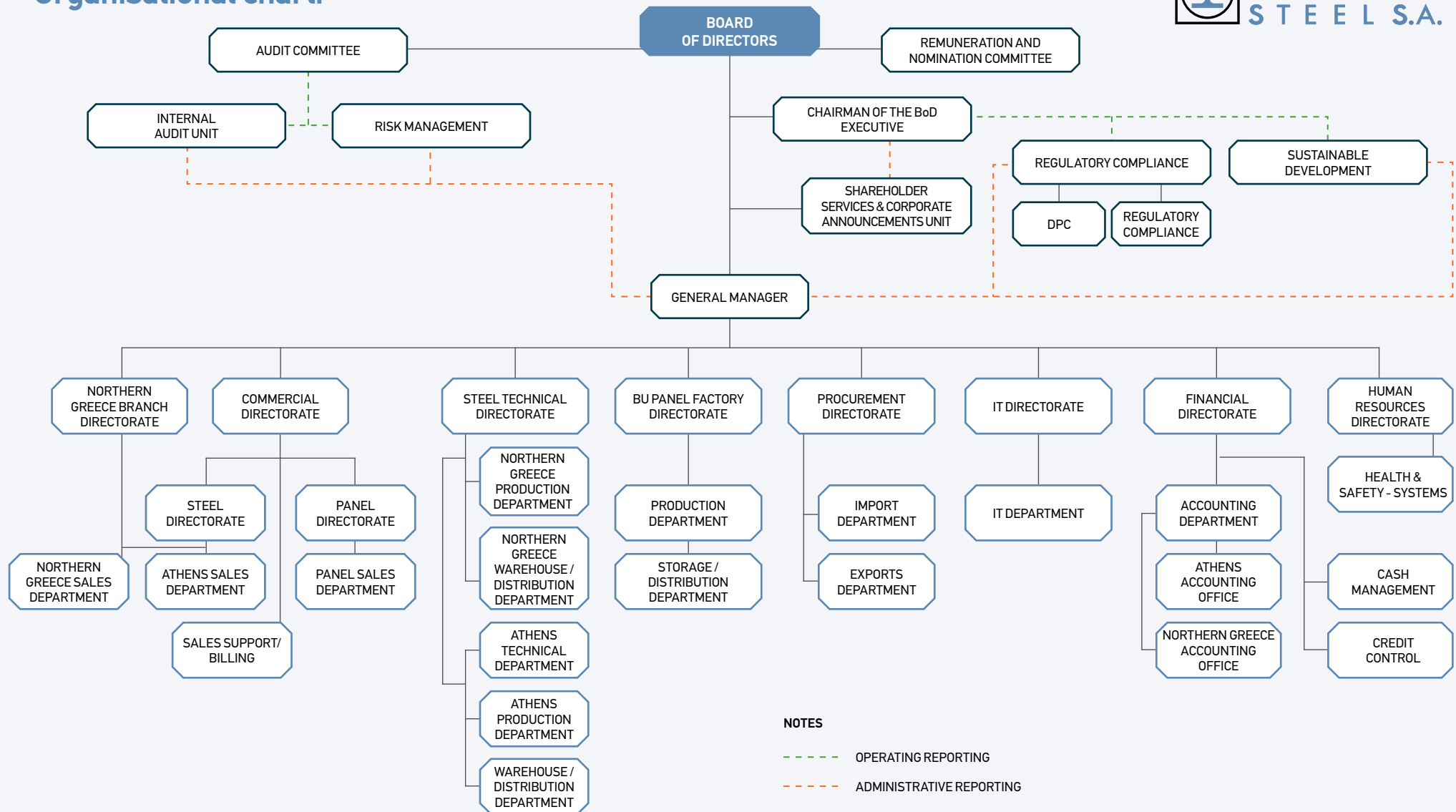
Organisational Structure & Operational Excellence

The organisational chart of **SIDMA Steel** clearly illustrates the roles, responsibilities, and hierarchical relationships that govern its operations. This structure is not merely a diagram, but a mechanism that:

- Facilitates internal collaboration and the uninterrupted flow of information.
- Ensures that reporting lines are clearly understood at all levels of the organisation.
- Strengthens organisational flexibility and the Company's overall efficiency.

The organisational structure of **SIDMA Steel** is presented on the next page.

Organisational chart:



Governance Structure

SIDMA Steel applies a comprehensive corporate governance system with clearly defined roles and responsibilities for all governing bodies. The Company's multi-level regulatory framework - comprising specialised Regulations, Policies, and Procedures - operates in an integrated manner to ensure transparency, consistency, and accountability. This structure serves as a guarantor for the achievement of its strategic objectives, with the Company centrally governed by the General Meeting of Shareholders and the Board of Directors.

General Meeting of Shareholders

The General Meeting of Shareholders of SIDMA Steel S.A. is the supreme governing body of the Company and is responsible for deciding on all corporate matters. Its legally adopted resolutions are binding for all shareholders, including those who are absent or dissenting.

Board of Directors

The Company's Board of Directors (BoD) holds a central role in shaping and defining its long-

term strategy, ensuring absolute alignment with business objectives. Through a structured process of risk monitoring and the identification of new opportunities, the BoD guarantees sound decision-making, promoting the values of accountability and transparency.

Regarding the Company's corporate governance, the Board of Directors has the following responsibilities:

- It defines and oversees the implementation of the corporate governance system in accordance with Articles 1 to 24 of Law 4706/2020, and monitors and periodically evaluates at least every three (3) financial years its application and effectiveness, taking appropriate actions to address any deficiencies.
- It ensures the adequate and effective operation of the Company's Internal Control System (ICS), which is designed, in particular, to achieve the following objectives:
 - a) the consistent implementation of the business strategy through the efficient use of available resources,
 - b) the identification and management of material

risks associated with its business activity and operation,

- c) the effective operation of the Company's Internal Audit Unit,
- d) ensuring the completeness and reliability of the data and information required for the accurate and timely determination of the Company's financial position and the preparation of reliable financial statements, as well as its non-financial statement, in accordance with article 151 of Law 4548/2018,
- e) compliance with the regulatory and legislative framework, as well as the internal regulations governing the Company's operation.
- It ensures that the operations comprising the Internal Control System are independent from the business segments they audit and that they are provided with adequate financial and human resources, as well as the authority necessary for the effective performance of their duties, in line with their role. It also ensures that reporting lines and allocation of responsibilities are clear, enforceable, and properly documented.

The composition of the Board is characterised by diversity and expertise, including executive, non-executive, and independent non-executive members, whose roles are defined in accordance with the applicable regulatory framework. The Board retains full authority for decision-making concerning the management of the Company, the management of its assets, and the overall achievement of its corporate purpose. It also acts without restrictions, except for those expressly reserved to the General Meeting of Shareholders by law or the Articles of Association.

The current Board of Directors consists of ten (10) members and was elected in June 2024 for a three-year term.



SIDMA Steel consistently applies the applicable corporate governance legislative framework (Law 4706/2020), ensuring diversity of perspectives and objectivity in decision-making. Within this framework, the Company strictly adheres to its approved Suitability Policy, placing particular emphasis on inclusion and equal gender representation, as well as on the strict independence criteria applicable to Board members.

The Board of Directors of SIDMA Steel is composed of professionals with extensive experience and proven expertise in managing strategic matters. The diversity of skills and breadth of professional backgrounds among its members ensure a comprehensive and multidimensional approach

to addressing challenges. This collective expertise contributes to enhanced oversight, prudent resource management, and the effective implementation of the Company's objectives, thereby strengthening its long-term sustainability and growth trajectory.

Remuneration and Nomination Committee

The Remuneration and Nomination Committee operates as a unified institutional body, playing a central role in safeguarding management continuity and aligning remuneration with the strategy of SIDMA Steel. The Core Operational Pillars of the Remuneration and Nomination Committee are:

- **Staffing & Nomination:** The Committee identifies,

evaluates, and proposes the most suitable individuals for the Board of Directors, establishing rigorous selection and appointment criteria.

- **Remuneration Policy:** The Committee designs and updates a remuneration framework that ensures long-term sustainability and meets the expectations of shareholders, employees, and society as a whole.
- **Strategic Evaluation:** The Committee periodically reviews the structure and composition of the BoD, analysing the level of knowledge and skills of its members. In the event that specific needs are identified, it clearly defines the prerequisites for filling new positions, thereby ensuring that the BoD always possesses the necessary assets for the effective governance of the Company.

Cybersecurity Framework Oversight

The Board of Directors oversees and monitors the cybersecurity framework, ensuring that the Company possesses the necessary resources and appropriate policies to address digital threats. The Board receives

regular briefings on cyber threat assessments and the effectiveness of defense systems, integrating digital risks into the overarching Enterprise Risk Management framework. Furthermore, it ensures

the implementation of rigorous security protocols and acceptable use policies for systems, in full alignment with international standards and regulatory requirements (GDPR).



Sustainability Oversight

The Board of Directors of SIDMA Steel closely monitors the design and implementation of an effective Internal Control System (ICS), systematically evaluating the Company's progress against established sustainable development goals. Recognising that sustainability is

inextricably linked to social acceptance to operate, the BoD ensures the existence of mechanisms that allow for a substantive understanding of stakeholder needs.

SIDMA Steel promotes a timely and open dialogue,

by leveraging dedicated communication channels for each stakeholder group. The objective is to align their collective interests with the corporate strategy, ensuring that decision-making takes into account the value created for all of the Company's social and economic partners.



Regulatory Compliance

For SIDMA Steel, Regulatory Compliance does not constitute a mere formal obligation, but rather the central axis of the Governance pillar within the framework of its ESG strategy.

The primary mission of regulatory compliance is the establishment and implementation of appropriate and updated Policies and Procedures, aiming to achieve full and continuous compliance of the Company with the applicable regulatory framework in a timely manner, and to always maintain a comprehensive view of the degree of achievement of this objective. When establishing the relevant Policies and Procedures, the complexity and nature of the Company's operations are thoroughly evaluated, including the development and promotion of new products and business practices.

Cohesive Framework of Policies and Procedures

SIDMA Steel applies a model Corporate Governance system that goes beyond mere compliance with the law. This framework integrates Regulations and Policies ensuring that corporate principles are translated into daily practice for every BoD member, executive, or employee.

- **Integrated Operations:** Through systematic monitoring, full alignment across management levels is achieved.
- **Culture of Accountability:** Transparency and accountability are strengthened, safeguarding the Company against operational and regulatory risks.

Suitability and 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. At the same time, its implementation ensures that the Board is composed of individuals who possess the necessary capabilities, knowledge, skills, and experience, as well as independence of judgement, integrity, and good reputation, thereby contributing to good corporate governance and effective

management for the benefit of the Company, its shareholders, and its other stakeholders.

Remuneration Policy

The Remuneration Policy of SIDMA Steel is designed to act as an incentive for development and a tool for alignment with the Company's interests.

- **Alignment with Strategy:** The remuneration of members of the BoD and senior executives is closely linked to the Company's long-term sustainability and the achievement of corporate objectives.
- **Risk Management:** Practices that could lead to excessive risk-taking are prevented, thereby safeguarding the Company's corporate interests.



Regulatory Compliance Policy

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. The Policy aims to create a framework within which the Company adequately manages, monitors, and ensures all its obligations and its compliance with the legal and regulatory framework. The key pillars of Regulatory Compliance, based on the legislative and regulatory framework and best practices, are as follows:

Health and Safety	Labour Legislation	Privacy Policy	Environment and Carbon Footprint	Unfair competition
Corporate Governance Legislation	Company Rules of Procedure	Code of Ethics and Conflict of Interest	Company Internal Policies and Procedures	Quality System

Code of Ethics and Business Conduct

The Code of Ethics and Business Conduct adopted by SIDMA Steel encompasses the fundamental principles, rules and values that constitute the framework for corporate activities and determines the day-to-day conduct and practice. This set of rules and principles outlines the conduct expected of its people, as well as the manner in which business operations are conducted with its customers, suppliers, and other partners. The Company always operates in accordance with the applicable framework of laws, regulations,

and internal policies. Nevertheless, recognising that the legislative framework cannot anticipate every business behaviour, it considers it vital for all customers, suppliers, its people, and other stakeholders, to fully understand what the Company stands for and the way it operates.

The Code of Ethics and Business Conduct of SIDMA Steel is based on the ten principles of the UN Global Compact, which aims to align businesses with ten universally accepted principles in the areas of

human rights, working conditions, environmental protection and combating corruption. At the same time, SIDMA Steel takes into account the OECD Guidelines the Company's Code of Ethics for multinational enterprises.

The combination of the Code with the Company's principles and values forms the foundation for building trust, which plays a pivotal role in its sustainable business success.



Anti-Bribery Policy

Zero-Tolerance Commitment: For SIDMA Steel, integrity and transparency are not merely regulatory obligations, but fundamental corporate values. The Company recognises that bribery undermines fair competition, increases operational costs, and irreparably damages corporate reputation. Consequently, it applies a strict Zero-Tolerance Policy towards any form of corruption, adopting a specialised framework for prevention and enforcement.

The Anti-Bribery Policy focuses on the following areas:

- **Guidance Framework:** Providing clear instructions to all personnel and partners to recognise and avoid situations that carry a risk of corruption.
- **Response Mechanisms:** Establishing rigorous internal rules and safeguards across all commercial and administrative transactions.
- **Protection of Integrity:** Ensuring that no business objective is ever prioritised over the Company's Code of Ethics.

Reporting & Transparency Culture

The Company actively encourages responsible behaviour and fosters a secure environment for reporting suspicious incidents:

- **Communication Channels:** Operation of protected Whistleblowing Channels that guarantee confidentiality and the protection of whistleblowers.

- **Continuous Training** Promoting a culture of integrity across all levels of the hierarchy, ensuring that every team member acts as a custodian of the Company's values.



Zero

complaints and fines related to corruption and bribery in 2025



Zero

breaches of business conduct in 2025



Zero

legal action regarding anti-competitive conduct, anti-monopoly, and monopoly practices in 2025



Zero

instances of non-compliance with the regulatory framework in 2025



Zero

cases of legal action or financial penalties related to corruption or bribery in 2025

Whistleblowing and Complaints Management Policy

SIDMA Steel has established a robust whistleblowing and complaints management mechanism, which serves as an essential safeguard for upholding corporate integrity. This Policy defines the investigation procedures for incidents regarding:

- Irregularities or omissions.
- Criminal acts or violations of the Code of Ethics.
- Any behaviour that may jeopardise the Company's reputation and operations.

The right to submit a complaint extends to all personnel, as well as to customers, suppliers, or third parties who interact with the Company.



Fundamental Principles and Protection

The effectiveness of the system relies on building an environment of trust. For this reason, the Policy guarantees:

- **Protection against Retaliation:** We are committed to the full protection of whistleblowers against any form of adverse treatment, discrimination or retaliation.
- **Confidentiality & Personal Data:** Complaints are handled with absolute confidentiality, strictly adhering to the requirements of the General Data Protection Regulation (GDPR).
- **Objective Investigation:** Every report is examined with impartiality and transparency by the competent bodies.

Submission & Management Mechanism (Whistleblowing Channels)

SIDMA Steel encourages the submission of complaints made in good faith. The whistleblower should have reasonable grounds to believe that the information

provided is true and relates to actual non-compliance incidents, thereby contributing to the continuous improvement of internal processes. For this purpose,

the Company has established a strictly defined procedure for the receipt, processing, and investigation of complaints, ensuring integrity at every stage.

0

confirmed whistleblowing cases through
the whistleblowing mechanism in 2025

0

complaints/ reports through
the whistleblowing mechanism in 2025

Digital Whistleblowing Platform

SIDMA Steel provides a dedicated electronic whistleblowing platform to facilitate communication and ensure the highest possible level of protection. Through this platform, the following are achieved:

- **Ensuring Anonymity:** It provides the option for confidential (named) or anonymous reports, utilizing technology that prevents the disclosure of the user's identity.
- **Two-Way Communication:** It allows the administrator to communicate with the whistleblower for clarifications, while maintaining their anonymity throughout the entire process.
- **Multi-Level Access:** It is accessible to both Company personnel and external partners (customers, suppliers, third parties).

The Compliance Officer holds central responsibility for the proper operation of the mechanism:

- **Confidential Assessment:** Each piece of information is evaluated under strict confidentiality criteria.
- **Record Keeping:** A complete and secure record is maintained for each complaint, including the stages of investigation and final outcomes.
- **Accountability:** All actions and corrective measures implemented are recorded in detail, ensuring that no complaint is left unaddressed.
- **Commitment:** SIDMA Steel guarantees that data management is conducted with absolute respect for privacy, in compliance with the highest international security standards.

Conflict of Interest Policy

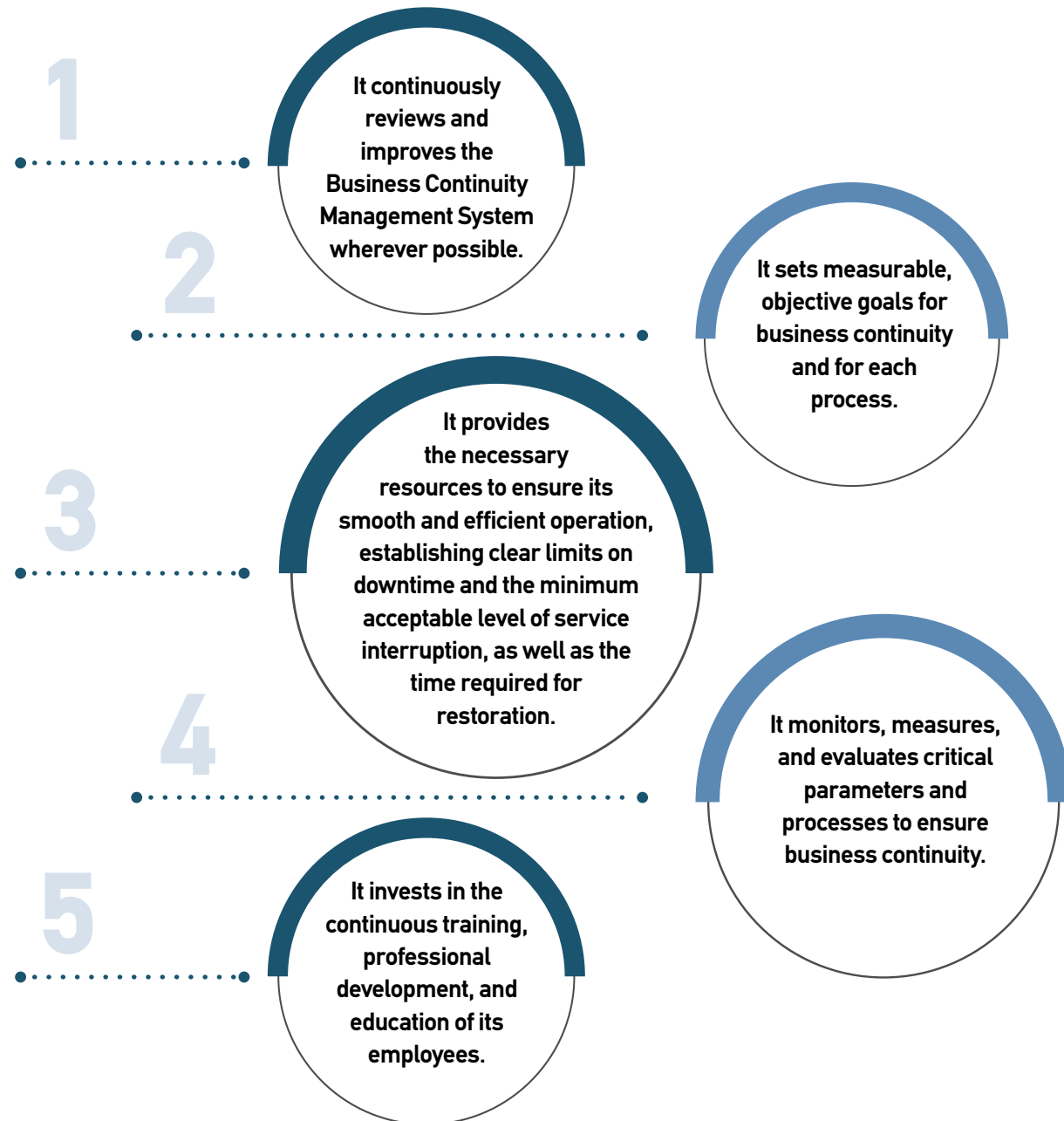
SIDMA Steel places particular emphasis to ensuring impartiality and objectivity at all stages of decision-making. Recognising that shareholder and investor trust is built on transparent management, the Company implements a rigorous framework for preventing and managing conflict of interest situations. The Company has adopted a Conflict of Interest Policy that covers any form of potential involvement, whether it is actual (an existing conflict during decision-making), perceived (a situation that could be viewed by third parties as a conflict, thereby damaging the Company's reputation), or potential (a situation that may develop into a conflict in the future).

The Policy provides clear guidance to members of Management, as well as to all employees and executives whose roles influence the Company's business activities. In addition, it ensures that all business decisions are based exclusively on objective criteria and the Company's interests, eliminating personal interests or external influences. It also defines the disclosure procedures and mitigation measures to be applied whenever any conflict arises.



Business Continuity Policy

A core principle and commitment of the Company, as well as the philosophy of every executive, is to ensure the uninterrupted provision of services and products, the full satisfaction of its customers' contractual requirements, and absolute compliance with the applicable legislative framework. The Company views business continuity as a fundamental prerequisite for its stable and seamless operation, continuously enhancing its resilience against potential risks. Within this framework, it has developed a business continuity plan regarding the Company's resilience against disruptions to its operations or parts thereof, as well as its operational integrity and efficiency. At the same time, it has established a Business Continuity Policy, ensuring a timely response and the rapid restoration of its operations.



Internal Control System

SIDMA Steel has established a comprehensive Internal Control System (ICS), fully aligned with the modern regulatory framework. The ICS consists of institutionalized mechanisms and safeguards that cover the entire scope of the Company's activities, ensuring operational integrity and the protection of corporate assets.

Through the systematic implementation of the Internal Control System, the Company achieves:

- **Strategic Alignment:** Ensuring the consistent execution of business strategy across all levels of the organization.
- **Holistic Risk Management:** Timely identification, assessment, and mitigation of potential risks (Enterprise Risk Management).
- **Reliability of Information:** Guaranteeing the completeness and accuracy of financial and

non-financial data, ensuring transparent reporting of the Company's performance.

- **Regulatory Compliance:** Full alignment with the applicable legal and regulatory framework, internal policies, and the Code of Ethics.
- **Digital Security:** Effective operation of information systems for the secure processing and protection of operational data.

With a strong commitment to continuous improvement and maximum transparency, the Company's Internal Control System is periodically evaluated (every three years) by an independent external body. This process aims to certify the adequacy and effectiveness of the system, providing additional assurance to shareholders and stakeholders regarding the high standards of corporate governance.



Audit Committee

The Audit Committee operates as an autonomous and independent body. Its primary mission is to monitor and evaluate the effectiveness of audit procedures / practices, as well as the operation of both internal and external audit. Within the scope of its role, it actively and substantially assists the Board of Directors, enhancing its capacity to oversee the reliability of financial information, the adequacy of accounting systems, and the overall quality of financial reporting. At the same time, it ensures that control mechanisms and risk management systems are in place and operating effectively. Additionally, it monitors the Company's compliance with the corporate governance framework.





Internal Audit Unit

The Internal Audit Unit of SIDMA Steel operates as an independent and objective assurance and consulting body, designed to add value and continuously improve the Company's operations. It serves as a critical control mechanism and reports hierarchically to the Audit Committee, thereby ensuring its full autonomy from executive functions.

The Internal Audit Unit contributes to the achievement of the Company's strategic objectives by adopting a systematic and disciplined approach to evaluating and improving the effectiveness of the following processes:

- **Evaluation of Internal Controls:** It conducts regular audits to verify the adequacy and effectiveness of internal control systems across all business units.
- **Risk Management:** Assists in the identification and

prioritisation of operational risks, recommending corrective actions to mitigate them.

- **Compliance Audits:** Verifies adherence to internal regulations, Company policies, and the applicable legal and regulatory framework.
- **Fraud Prevention:** Reviews the integrity of procedures aimed at preventing and detecting irregularities, fraud, or cases of mismanagement.

The activities of the Internal Audit Unit strengthen transparency and accountability by providing the Management and the Audit Committee with objective reporting on the quality and effectiveness of operations, free from subjective interference. Through its findings and recommendations, the Company continuously optimises its processes and enhances its resilience in addressing market challenges.

SIDMA Steel has adopted and applies the Hellenic Corporate Governance Code (HCGC), aiming on the one hand to ensure a high level of transparency and communication with all stakeholders, and on the other to provide timely and reliable information to the investment community. Within this framework, the Company implements a periodic assessment system of its corporate governance framework, conducted in accordance with the applicable regulatory requirements every three years. In addition, the Company carries out an annual voluntary assessment, with the objective of early identification and timely remediation of potential deviations, thereby strengthening continuous improvement and the overall effectiveness of its corporate governance framework.

Risk Management

Risk management, as an integral part of the Company's strategy, is a continuous and evolving process that extends across all its activities and contributes to the safe and efficient operation of the Company. In this sense, effective risk management supports the timely prevention and appropriate response to risks, thereby strengthening the Company's long-term resilience, as this approach enables it to anticipate and manage potential risks that could affect its operations and reputation.

Risk management is carried out by the Risk Management Officer and its main objective is the monitoring and improvement of the Company's operations and policies regarding risk management, adopting a systematic and disciplined approach to the identification, recording, assessment, and management of risks.



Key Non-Financial Risks

The smooth operation of the Company may be affected by various direct or indirect potential risks. The main categories of non-financial risks identified within the Company are as follows:



Climate Change

SIDMA Steel recognises the significant global impact of climate change.

The Company closely monitors international trends and is constantly implementing new measures to mitigate these risks, such as rising carbon dioxide emissions, by making new investments. At the same time, it already operates renewable energy plants in order to reduce the use of fossil fuels, while it aims to further expand similar initiatives.



Physical Security of Facilities

SIDMA Steel aims to ensure the proper functioning of its facilities.

The Company takes all necessary measures to protect its production facilities, equipment, resources, assets, and personnel from damage or loss (including, for example, natural disasters or fire). In cooperation with an external partner, it conducts systematic inspections of the physical security of its facilities, and based on the findings, additional measures are implemented or existing ones are strengthened.



Occupational Health and Safety

SIDMA Steel recognises occupational health and safety as an absolute priority.

The Company aims to continuously monitor and improve safety standards regarding risks to employee health and safety and to eliminate injuries. To this end, it implements a comprehensive management system and an accident reduction programme, while simultaneously investing in newer equipment and the continuous training of its workforce.

Data Protection and Security

Personal data protection is a fundamental principle for SIDMA Steel, which is committed to ensuring the confidentiality, integrity, and security of the information it processes. The Company's Management is fully committed to protecting the

personal data processed within the scope of its business operations and functions, as well as to complying with applicable legislation and best practices in personal data processing. Within this framework, appropriate policies and measures are

implemented for data protection. At the same time, the Company ensures the awareness and training of its employees on personal data protection issues, thereby reinforcing a culture of accountability and respect for privacy.

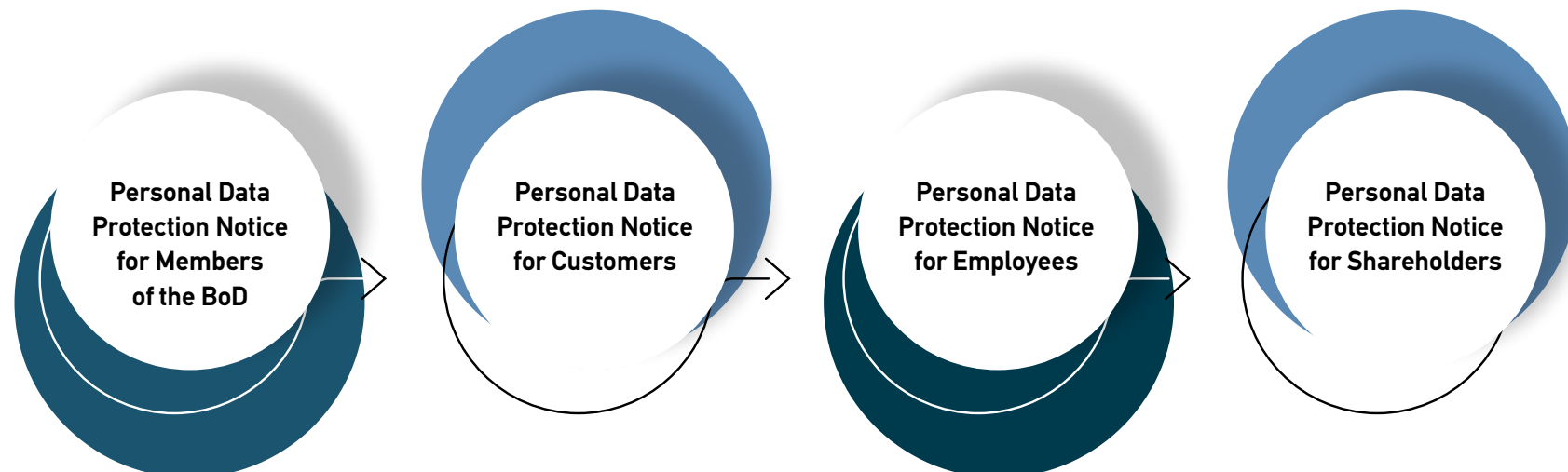
0

**incidents of personal
data breaches**

**0**

**reports of breaches of customer privacy
or loss of customer data**

SIDMA Steel implements a Privacy Policy and a dedicated Policy for each stakeholder:



Economic Growth and Performance Indicators

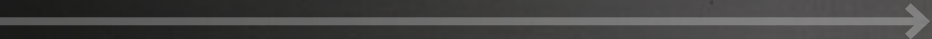
SIDMA Steel monitors its financial flows in an organised and systematic manner, with its financial performance serving as a key pillar of the Company's sustainable development. Data for the year 2025 indicate an upward trajectory in the Company's activities. More specifically, increases are recorded both in employee-related expenses of approximately 7% and in investments made - sizes that reflect the Company's broader growth and progress. Particularly significant is the 12% increase in purchases from domestic suppliers, which indicates strengthened local partnerships and a boost to the domestic market.

The following table presents the Company's financial performance for 2025, reflecting its commitment to growth, sustainability, and resilience. This progress lays the foundation for further investments and initiatives of an environmental and social nature, enhancing the Company's transparency and the trust of all stakeholders in the Company.



		2024	2025
Company Financial Data	FINANCIAL DATA (in €)		
	Total revenue (Turnover)	141,709,487	139,086,451
	Operating profit	3,893,105	6,161,767
	Operating costs	142,722,343	137,587,511
	Payments to capital providers	10,667,378	13,855,989
	Profit / (losses) before tax	-3,813,991	-335,769
	Net profit / (losses) after tax	-3,488,228	5,423
	Payments for taxes - indirect (VAT)	3,071,461	2,545,824
	Payments for taxes - direct	3,544,459	3,579,344
	Total payments to public entities (total direct and indirect taxes paid)	6,615,920	6,125,168
	Equity	23,151,088	23,166,020
	Total investments	702,985	1,539,439
	Total assets	130,667,915	129,040,377
		2024	2025
To employees	SOCIAL PRODUCT in €		
	Payroll (gross employee compensation)	5,146,063	5,480,019
	Employee insurance costs (employer contributions and private insurance)	1,284,974	1,330,067
	Other employee benefits	232,878	256,807
	Compensations (dismissals/pensions)	85,050	125,500
	Total to employees	6,748,965	7,192,393
To other stakeholders	Payments to capital providers (banks etc.)	10,667,378	13,855,989
	Taxes paid (to the Greek State)	6,615,920	6,125,168
	Purchases from domestic sup-pliers (incl. VAT)	40,368,542	45,474,753
	Purchases from foreign suppliers	90,275,887	73,609,423
Total		147,927,728	139,065,333

Appendix



08

About the Report

The Sustainability Report 2025 of SIDMA Steel is the fourth consecutive report and covers the period from 01/01/2025 to 31/12/2025. Through this publication, the Company describes how it responds holistically to contemporary economic, environmental, and social challenges, while contributing to the path toward Sustainable Development and Corporate Responsibility. The qualitative and quantitative information presented in this Report covers all of SIDMA Steel's operations in Greece.

The Sustainability Report 2025 of SIDMA Steel is available in electronic form on the Company's website under 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.

To finalize the content of this Report, material topics

were identified and prioritized, taking into account the requirements and needs of our stakeholders. The results of this process are presented in the chapter "Sustainability at the core".

Furthermore, the guidelines of the sector-specific SASB standards, specific indices of the Athens Stock Exchange's ESG Reporting Guide, as well as the United Nations 17 Sustainable Development Goals (SDGs) have been taken into account.

Project Team

The preparation of the report was supported and scientifically managed (data collection, assessment and preparation) by Grant Thornton. (<https://www.grant-thornton.gr/en/>).



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 SIDMA Steel 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

By promoting a two-way and open dialogue with our stakeholders, we welcome any comment or feedback for improvement that can help enhance our performance and initiatives toward Sustainable Development. 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: Mrs. Matina Tsili

Human Resources Director and Chief Compliance Officer

▷ info@sidma.gr ▷ www.sidma.gr

ATHEX ESG Reporting Guide 2025

Pillar	2025 ID	2024 Sub - ID	Metric Title	Reference
ENVIRONMENT	C-E1	C-E1-1	Scope 1 emissions - Total amount of direct emissions (Scope 1)	Page 66
	C-E1	C-E1-2	Scope 1 emissions - GHG intensity of Scope 1 emissions	Page 66
	C-E2	C-E2-1	Scope 2 emissions - Total amount of indirect emissions (Scope 2) - Location based approach	Page 66
	C-E2	C-E2-2	Scope 2 emissions - GHG intensity of Scope 2 emissions - Location based approach	Page 66
	C-E2	C-E2-3	Scope 2 emissions - Total amount of indirect emissions (Scope 2) - Market based approach	Page 66
	C-E2	C-E2-4	Scope 2 emissions - GHG intensity of Scope 2 emissions - Market based approach	Page 66
	C-E3	C-E3-1	Energy consumption and production - Total amount of energy consumed within the organisation	Page 66
	C-E3	C-E3-2	Energy consumption and production - Percentage of electricity consumed	59%
	C-E3	C-E3-3	Energy consumption and production - Percentage of renewable energy consumed	Page 66
	C-E3	C-E3-4	Energy consumption and production - Total amount of energy produced	Page 66
	C-E3	C-E3-5	Energy consumption and production - Percentage of renewable energy produced	25.68%
	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 62
	A-E3	A-E3-1	Waste management - Total amount of hazardous waste	Page 69
	A-E3	A-E3-2	Waste management - Total amount of non-hazardous waste	Page 69
	A-E3	A-E3-3	Waste management - Percentage of waste by type of treatment - Recycled	Page 69
	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%
	A-E3	A-E3-6	Waste management - Percentage of waste by type of treatment - Landfilled	0%

Pillar	2025 ID	2024 Sub - ID	Metric Title	Reference
ENVIRONMENT	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	Energy and Climate Change Policy
	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 66
	A-E8	A-E8-2	Total GHG emissions - Total GHG emissions market based	Page 66
	SS-E3	SS-E3-1	Water consumption - Total water withdrawn	Page 68
SOCIETY	C-S1	C-S1-1	Stakeholder engagement - Discussion of organisation's main stakeholders and analysis of key stakeholder engagement practices	Page 29-30
	C-S2	C-S2-1	Percentage of female employees	17%
	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	4.8%
	C-S4	C-S4-2	Employee turnover - Percentage of full-time employee involuntary turnover	0.6%
	C-S4	C-S4-3	Employee turnover - Total employee turnover	Page 42
	C-S5	C-S5-1	Employee training - Average training hours of employees at top management level	Page 45
	C-S5	C-S5-2	Employee training - Average training hours of the rest employee categories	Page 45
	C-S5	C-S5-3	Employee training - Average training hours - Women	Page 44
	C-S5	C-S5-4	Employee training - Average training hours - Men	Page 44
	C-S6	C-S6-1	Human rights policy - Description of human rights policy and fundamental principles	Page 40
	C-S7	C-S7-1	Percentage of employees covered by collective bargaining agreements	Page 39
	C-S8	C-S8-1	Value chain - Discussion of supplier screening using ESG criteria	Page 21
	C-S8	C-S8-2	Value chain - Policies to manage material impacts, risks and opportunities related to workers in the value chain	Pages 40-41
	A-S2	A-S2-1	Total amount of monetary expenditure on employee training	42,085.1€

Pillar	2025 ID	2024 Sub - ID	Metric Title	Reference
SOCIETY	A-S3	A-S3-1	Percentage of difference between male and female earnings	-5,19%
	SS-S6	SS-S6-1	Health and safety performance - Number of injuries	Page 58
	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 58
	SS-S6	SS-S6-4	Health and safety performance - Accident severity rate	Page 58
	SS-S8	SS-S8-1	Customer satisfaction - Disclosure of customer satisfaction survey results	Pages 17-18
	SS-S9	SS-S9-1	Customer grievance mechanism - Description of key operations and procedures of Customer Grievance Mechanism	Pages 48, 85-86
GOVERNANCE	C-G1	C-G1-1	Board composition - ESG related qualifications of the board members	The Company has no legal obligation in this regard ANNUAL FINANCIAL REPORT , page 29
	C-G1	C-G1-2	Board composition - Classification of the Chairman of the Board	ANNUAL FINANCIAL REPORT , page 47
	C-G1	C-G1-3	Board composition - Percentage of female board members	Page 80
	C-G1	C-G1-4	Board composition - Percentage of non-executive board members	Page 80
	C-G1	C-G1-5	Board composition - Percentage of independent non-executive board members	Page 80
	C-G1	C-G1-6	Board composition - Number of board members	Page 80
	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 81
	C-G3	C-G3-1	Materiality - Description of the materiality assessment process	Page 31
	C-G3	C-G3-2	Materiality - Approach	Page 32
	C-G4	C-G4-1	Sustainability Policy - Description of sustainability policy and fundamental principles	Page 27
	C-G5	C-G5-1	Business ethics policy - Description of business ethics policy and fundamental principles	Code of Ethics & Business Conduct
	C-G6	C-G6-1	Data security policy - Description of data security policy and fundamental principles	Personal Data Protection Policy
	C-G7	C-G7-1	Sustainability reporting - Basis for preparation of sustainability reporting	Page 96

Pillar	2025 ID	2024 Sub - ID	Metric Title	Reference
GOVERNANCE	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 24, 2026
	A-G1	A-G1-1	Strategy, business model and value chain - Discussion of strategy, business model and value chain	Pages 11-12, 26, 33-34
	A-G2	A-G2-1	Business ethics violations - Total amount of monetary losses as a result of business ethics violations	Page 84
	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 34
	A-G3	A-G3-2	ESG targets - Medium-term targets associated with strategic ESG objectives	Page 34
	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	Pages 85-86
	SS-G2	SS-G2-1	Critical risk management - Description of systems, processes and mechanisms to identify and mitigate critical risks	ANNUAL FINANCIAL REPORT , 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	ANNUAL FINANCIAL REPORT , pages 33-34

GRI Content Index

GRI 1: Foundation

GRI 1: Foundation statement of use	The information provided in this report reflects the activities of SIDMA Steel for the period from 1/1/2025 – 31/12/2025 presenting its economic, environmental, and social performance. The report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards 2021.
GRI 1 used	GRI 1: Foundation 2021
Applicable GRI Sector Standard(s)	No applicable GRI Sector Standard

GRI 2: General Disclosures 2021

GRI Standards	Disclosure	Page in the Report / Reference
1. THE ORGANIZATION AND ITS REPORTING PRACTICES		
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
2. ACTIVITIES AND WORKERS		
2-6	Activities, value chain and other business relationships	Pages 6-7, 10-15
2-7	Employees	Pages 36-48
2-8	Workers who are not employees	SIDMA Steel employs 21 individuals from third-party companies.
3. GOVERNANCE		
2-9	Governance structure and composition	Pages 78-80
2-10	Nomination and selection of the highest governance body	Pages 79-80
2-11	Chair of the highest governance body	ANNUAL FINANCIAL REPORT , page 47
2-12	Role of the highest governance body in overseeing the management of impacts	Pages 79-80
2-13	Delegation of responsibility for managing impacts	Pages 79-80
2-14	Role of the highest governance body in sustainability reporting	Page 31
2-15	Conflict of interest	Page 86

GRI 2: General Disclosures 2021

GRI Standards	Disclosure	Page in the Report / Reference
2-16	Communication of critical concerns	Pages 78-79
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 REMUNERATION POLICY OF THE MEMBERS OF THE BoD - SIDMA
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 3-4
2-23	Policy commitments	Pages 27, 40-41, 52, 61-62, 80, 82-87, 92
2-24	Embedding policy commitments	Pages 27, 40-41, 52, 61-62, 80, 82-87, 92
2-25	Processes to remediate negative impacts	Pages 40-41, 85-86
2-26	Mechanisms for seeking advice and raising concerns	Pages 85-86
2-27	Compliance with laws and regulations	Pages 77, 82-92
2-28	Membership associations	Page 22

5. STAKEHOLDER ENGAGEMENT

2-29	Approach to stakeholder engagement	Pages 29-30
2-30	Collective bargaining agreements	Page 39

GRI 3: Material Topics 2021

GRI Standards	Disclosure	Page in the Report / Reference
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Page 31
	3-2 List of material topics	Page 32

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 12, 31-34, 60-70
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions Page 34	Page 66
	305-2 Energy indirect (Scope 2) GHG emissions Page 34	Page 66
	305-4 GHG intensity of emissions	Page 66

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 12, 31-34, 60-70
GRI 302: Energy 2016	302-1 Energy consumption within the organization Page 34	Page 66
	302-3 Energy intensity	Page 66

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

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34, 50-58
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Page 53
	403-2 Hazard identification, risk assessment, and incident investigation	Page 54
	403-3 Occupational health services	Page 56
	403-4 Worker participation, consultation, and communication on occupational health and safety	Pages 51, 56
	403-5 Worker training on occupational health and safety	Page 56
	403-8 Workers covered by an occupational health and safety management system 100%	100%
	403-9 Work-related injuries	Page 58

GRI 3: Material Topics 2021

GRI Standards	Disclosure	Page in the Report / Reference
EQUAL OPPORTUNITIES AND HUMAN RIGHTS		
Material issue for: Employees, Suppliers, State and Authorities, Local Communities		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34, 36-48
GRI 401: Employment	401-1 New employee hires and employee turnover	Page 42
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	Page 47
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Page 39
	405-2 Ratio of basic salary and remuneration of women to men	1,04
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	No such incident occurred/was reported during the reporting year of the Report
EMPLOYEE TRAINING AND DEVELOPMENT		
Material issue for: Shareholders, Employees		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34, 36-48
GRI 401: Employment 2016	404-1 Average hours of training per year per employee	Page 44
	404-2 Programmes for upgrading employee skills and transition assistance programmes	Page 45
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 46
CONSULTATION AND SUPPORT OF LOCAL COMMUNITIES		
Material issue for: Local Communities		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34, 72-75
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	Page 73-75
SOUND ADMINISTRATION AND BUSINESS ETHICS		
Material issue for: Shareholders, Investors, Employees, Customers, Suppliers, State and Authorities, Local Communities, Financial Institutions		
GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34, 77-94

GRI 3: Material Topics 2021

GRI Standards	Disclosure	Page in the Report / Reference
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	Page 94
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and actions taken	Page 84

RISK MANAGEMENT

Material issue for: Shareholders, Investors, Employees, Customers, Suppliers, Financial Institutions

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34, 77-94
Company Index	Risk Management Framework	Pages 90, 91

VALUE CREATION FOR ALL STAKEHOLDERS

Material issue for: Shareholders, Investors, Employees, Customers, Suppliers, State and Authorities, Local Communities, Financial Institutions

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 31-34
Company Index	Value creation framework for all stakeholders	Pages 11, 12

RESPONSIBLE PROCUREMENT MANAGEMENT

Material issue for: Shareholders, Investors, Customers, Suppliers, State and Authorities, Local Communities, Financial Institutions

GRI 3: Material Topics 2021	3-3 Management of material topic	Pages 12, 19-21, 31-34
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Page 20
Company Index	Number of suppliers assessed based on environmental and social criteria	Page 21

Feedback form

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

- ☐ Shareholders
- ☐ Customers
- ☐ Local communities
- ☐ Investors
- ☐ Suppliers
- ☐ Financial Institutions
- ☐ Employees
- ☐ State and Authorities
- ☐ Other: (please describe)

How would you evaluate SIDMA Steel S.A. 2025 Annual Sustainability Report?

Sections of the Report	Excellent	Satisfactory	Needs Improvement
Company Profile	☐	☐	☐
Sustainability at the core	☐	☐	☐
Putting People First	☐	☐	☐
Occupational Health and Safety	☐	☐	☐
Environmental Responsibility and Climate Action	☐	☐	☐
Our Social Contribution	☐	☐	☐
Responsible Leadership and Business Ethics	☐	☐	☐
Overall / general impression of the Report	☐	☐	☐

How easily did you locate information regarding the topics of interest to you?

- ☐ Very easily
- ☐ Fairly easily
- ☐ Relatively easily
- ☐ Not easily at all

How would you evaluate the visual presentation of the Report?

- ☐ Excellent
- ☐ Good
- ☐ Moderate
- ☐ Poor

Did the information included in the Report, as well as its presentation, contribute to forming a comprehensive picture of the Company's operations and activities?

☐ Yes

☐ No

☐ Needs improvement

Please highlight any issues that have not been adequately addressed in this Sustainability Report:

In our commitment to continuously enhancing the annual Sustainability Report of SIDMA STEEL S.A., we invite you to share any suggestions or recommendations you may have:

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



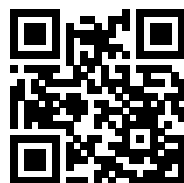
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For the attention of Mrs. Matina Tsili,
Human Resources Director/Chief Compliance Officer

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