SIDMA STEEL S.A.

ANNUAL FINANCIAL REPORT

FOR FISCAL YEAR

FROM JANUARY 1st TO DECEMBER 31st, 2022

APRIL 2023

www.sidma.gr

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A. Statements of Members of the Board in accordance with article 4 of Law 3556/2007

The members of the Board of Directors of SIDMA STEEL S.A.:

1. PANAGIOTIS I. BITROS
2. ANTONIOS P. KARADELOGLOU
3. MICHAEL C. SAMONAS

in our above-mentioned capacity declare that as far as we know:

- the attached financial statements of SIDMA STEEL S.A. for the annual period 01.01-31.12.2022, prepared according to the applicable accounting standards, present truly and fairly the assets and liabilities, the equity, and the financial results of SIDMA STEEL S.A. as well as of the companies included in the consolidation in aggregate,
  and
- the attached BoD Report provides a true view of SIDMA STEEL S.A. and the companies, included in the consolidation in aggregate, performance and results including a description of the main risks and uncertainties to which they are exposed to.

Aspropyrgos, April 20, 2023

The Members of the Board

CHAIRMAN OF THE BOARD OF DIRECTORS	**C.E.O.**	**MEMBER OF THE BOARD OF DIRECTORS**
PANAGIOTIS I. BITROS	ANTONIOS P. KARADELOGLOU	MICHAEL C. SAMONAS

B. Independent Auditor's Report
To the Shareholders of "MACEDONIAN STEEL PRODUCTS TRADING SIDMA S.A."

Report on Separate and Consolidated Financial Statements

Opinion

We have audited the accompanying separate and consolidated financial statements of MACEDONIAN STEEL PRODUCTS TRADING SIDMA S.A. (the Company), which comprise the separate and consolidated statement of financial position as at December 31st, 2022, separate and consolidated statements of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended and a summary of significant accounting policies and other explanatory information.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the financial position of the company MACEDONIAN STEEL PRODUCTS TRADING SIDMA S.A. and its subsidiaries (the Group) as at December 31st, 2022, the financial performance and cash flows for the year then ended, in accordance with the International Financial Reporting Standards (IFRSs) as adopted by the European Union.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs), as incorporated into the Greek Law. Our responsibilities, under those standards are further described in the "Auditor's Responsibilities for the Audit of the Financial Statements" section of our report. We are independent of the Company and its subsidiaries, during the whole period of our audit, in accordance with the International Ethics Standards Board for Accountants "Code of Ethics for Professional Accountants as incorporated into the Greek Law and we have fulfilled our ethical responsibilities in accordance with current legislation requirements and the aforementioned Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the separate and consolidated financial statements of the current year. These matters and the related risks of material misstatement were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not express a separate opinion on these matters.

Key Audit Matter	How our audit addressed the key audit matter
Recoverability of trade receivables (separate and consolidated financial statements)	
As of December 31st, 2022, the trade receivables of the Group and the Company amounted to € 56.3 million and € 48 million respectively, while the related accumulated impairment amounted to € 1.5 million and € 0.9 million respectively, as described in Note 8.6 to the financial statements. In order to estimate the amount of impairment of trade receivables of the Company and the Group, the Management assesses the recoverability of the trade receivables, taking into account the information provided by the Legal Department of the Group, arising from processing historical data and recent developments in the legal cases it manages, and reviews the maturity of the customers' balances as well as the settlement of the amounts collectible subsequently to the reporting period. Given the significance of the matter and the level of judgment and estimates required from the Management, we believe that the matter in question constitutes one of the key audit matters. The disclosures of the Company and the Group regarding the nature of the above receivables and estimates used in the assessment of their recoverability are included in Notes 4.6 and 8.6 to the accompanying financial statements.	The audit procedures we carried out in respect of evaluating recoverability of trade receivables included, among others: • Understanding and reviewing the credit control procedures of the Group as well as examining the key drivers of providing credit to customers • Assessment of the assumptions and methodology used by the Management to determine the recoverability of trade receivables or their classification as doubtful receivables. • Review of the legal consultant letters of representation regarding doubtful receivables treated during the year, and identification of any issues that present balances from trade receivables that are not recoverable in the future. • Review of maturity of outstanding trade receivables at year end and identification of any debtors in financial difficulty. • Recalculating impairment of trade receivables, taking into account specific parameters for debtors such as maturity of balances and reviewing data arising from discussions with the management. • Assessment of recoverability of balances by comparing the year closing amounts with subsequent collection of the amounts/ settlements. • Assessment of adequacy of the Group's and the Company's disclosures included in the notes to financial statement regarding this matter.

Key Audit Matter	How our audit addressed the key audit matter
Assessment of impairment of investments in subsidiaries (separate financial statements)	
As of 31 December 2022, the Company has recognized investments in subsidiaries of € 18.9 million, which are measured at cost less any accumulated impairment losses. According to IFRS, an entity is required to assess whether there is evidence of impairment regarding the value of assets. Assessing whether there is an indication that may lead to impairment loss on an asset requires a significant degree of judgment. The recoverable amount of every Cash Generation Unit (CGU/ investment in subsidiary) is determined as the highest amount between the fair value less costs to sell and value in use. This requires management's judgment regarding future cash flows of those CGUs and the discount rates applied to projections of future cash flows. With regard to future cash flows, the management judgments relate to variables such as revenue growth, gross profit margins and operating costs. Given the degree of subjectivity regarding the assumptions that are used as the basis for impairment analysis and significant judgments and estimates required from the management, we consider that impairment of investment in subsidiaries is one of the key audit matters. The Company's disclosures regarding the accounting policy and the assumptions and estimates used while assessing investments in subsidiaries are included in Notes 4.1, 5.7 and 8.3 to the financial statements.	The audit procedures we carried out in respect of assessing impairment in subsidiaries included, among others: • Review of the management's assessment of whether there is any indication of impairment of investments in subsidiaries. • Regarding investments in subsidiaries for which there were indications of impairment, we reviewed, with the assistance of our valuation specialists: (i) the reasonableness of the assumptions used in determining projected future cash flows; (ii) application of generally accepted valuation methods (iii) the reasonableness of the discount rates used, evaluating the assumptions and comparing them with externally available business segment and financial data; and (iv) confirming the mathematical precision of s models calculations. • Assessment of the reliability of the management's projections through comparing the actual performance against previous projections. • Assessment of adequacy of the disclosures included in the notes to financial statement regarding this matter.

Other Information

Management is responsible for the other information. The other information is included in the Board of Director's Report, the reference to which is made in the "Report on Other Legal and Regulatory Requirements" section of our Report, Statements of the Members of the Board of Directors, but does not include the financial statements and our auditor's report thereon.

Our opinion on the separate and consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the separate and consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the separate and consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on our audit, we conclude that there is a material misstatement therein, we are required to communicate that matter. No such issue has arisen.

Responsibilities of Management and Those Charged with Governance for the separate and consolidated Financial Statements

Management is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with the IFRSs as adopted by the European Union and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, management is responsible for assessing the Company's and Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless there is an intention to liquidate the Company or the Group or to cease operations, or there is no realistic alternative but to do so.

The Audit Committee (artic. 44 Law 4449/2017) of the Company is responsible for overseeing the Company's and the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the separate and consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs, as incorporated into the Greek Law, will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with ISAs, as incorporated into the Greek Law, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's and Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's or Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company of the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the separate and consolidated financial statements, including the disclosures, and whether the separate and consolidated

financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Company and the Group to express audit opinions on the separate and consolidated financial statements. We are responsible for the direction, supervision and performance of the Group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate and consolidated financial statements of the current period and are therefore the key audit matters.

Report on Other Legal and Regulatory Requirements

1. Management Report of the Board of Directors

Taking into consideration that Management is responsible for the preparation of the Management Report of the Board of Directors and the Corporate Governance Statement included in this report, according to the provisions of paragraph 5 of article 2 of Law 4336/2015 (part B) we note the following:

a. The Management Report of the Board of Directors includes the Corporate Governance Statement that provides the data and information defined under article 152, of Law 4548/218.

b. In our opinion, the Management Report of the Board of Directors has been prepared in compliance with the effective legal requirements of Articles 150 and 153 and Paragraph 1 (cases c' and d'), Article 152 of Law 4548/2018, and its content corresponds to the accompanying separate and consolidated financial statements for the year ended as at 31.12.2022.

c. Based on the knowledge we acquired during our audit, we have not identified any material misstatements in the Board of Directors' Report in relation to the Company MACEDONIAN STEEL PRODUCTS TRADING SIDMA S.A. and its environment.

2. Additional Report to the Audit Committee

Our opinion on the accompanying separate and consolidated financial statements is consistent with our Additional Report to the Company Audit Committee, prepared in compliance with Article 11, Regulation (EU) No 537/2014.

3. Provision of Non-Audit Services

We have not provided the prohibited non-audit services referred to in Article 5 of Regulation (EU) No 537/2014 to the Company and its subsidiaries.

Authorized non-audit services provided by us to the Company and its subsidiaries during the year ended as at December 31, 2022 are disclosed in Note 8.21 to the accompanying separate and consolidated financial statements.

4. Auditor's Appointment

We were first appointed statutory auditors by the Annual General Meeting of the Company on 13/06/2013. Since then, we have been appointed as the statutory auditors for a total period of 10 years based on the decisions of the General Meeting of Shareholders.

5. Bylaws (Internal Regulation Code)

The Company has in effect Bylaws (Internal Regulation Code) in conformance with the provisions of article 14 of Law 4706/2020.

6. Assurance Report on European Single Electronic Format

We examined the digital records of the Company "MACEDONIAN STEEL PRODUCTS TRADING SIDMA S.A." (the Company or/and the Group), prepared in accordance with the European Single Electronic Format (ESEF) as defined by the European Commission Delegated Regulation 2019/815, amended by the Regulation (EU) 2020/1989 (ESEF Regulation), which comprise the separate and consolidated financial statements of the Company and the Group for the year ended December 31, 2022, in XHTML format, as well as the provided XBRL file («21380093P5MN4CJUHL68-2022-12-31-el.zip») with the appropriate mark-up, on the aforementioned consolidated financial statements, including the other explanatory information (Notes to Financial Statements).

Regulatory Framework

The digital records of the ESEF are prepared in accordance with the ESEF Regulation and the Commission Interpretative Communication 2020/C379/01 of November 10, 2020, in conformance with Law 3556/2007 and the relevant announcements of the Hellenic Capital Market Commission and the Athens Stock Exchange (ESEF Regulatory Framework). In summary, this framework includes, inter alia, the following requirements:

- All annual financial reports shall be prepared in XHTML format.
- For the consolidated financial statements in accordance with IFRS, financial information included in the Statements of Comprehensive Income, Financial Position, Changes in Equity and Cash Flows as well as the financial reporting included in the other explanatory information shall be marked-up with XBRL tags XBRL (XBRL 'tags' and "'block tag'"), in accordance with the effective ESEF Taxonomy. ESEF technical specifications, including the relevant taxonomy, are set out in the ESEF Regulatory Technical Standards.

The requirements set out in the current ESEF Regulatory Framework constitute the appropriate criteria for expressing a conclusion of reasonable assurance.

Responsibilities of Management and Those Charged with Governance

Management is responsible for the preparation and submission of the separate and consolidated financial statements of the Company and the Group for the year ended December 31, 2022, in accordance with the requirements of ESEF Regulatory Framework, and for such internal control as management determines is necessary to enable the preparation of digital records that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibilities

Our responsibility is to design and conduct this assurance engagement in accordance with No. 214/4/11-02-2022 Decision of the Board of Directors of the Hellenic Accounting and Auditing Standards Oversight Board (HAASOB) and the "Guidelines on the auditors' engagement and reasonable assurance report on European Single Electronic Format (ESEF) for issuers whose securities are admitted to trading on a regulated market in Greece" as issued by the Institute of Certified Public Accountants of Greece on 14/02/2022 (hereinafter "ESEF Guidelines"), in order to obtain reasonable assurance that the separate and the consolidated financial statements of the Company, prepared by the management in accordance with ESEF are in compliance, in all material respects, with the effective ESEF Regulatory Framework.

We conducted our work in accordance with the Code of Ethics for Professional Accountants (IESBA Code) issued by the International Ethics Standards Board for Accountants, as incorporated in Greek legislation and we have complied with the ethical requirements of independence, in accordance with Law 4449/2017 and EU Regulation 537/2014.

We conducted our work in accordance with the International Standard on Assurance Engagements (ISAE) 3000 "Assurance Engagements other than Audits or Reviews of Historical Financial Information" and our procedures are limited to the requirements of ESEF Guidelines. Reasonable assurance is a high level of assurance but is not a guarantee that this work will always detect a material misstatement of non-compliance with the requirements of ESEF Regulation.

Conclusion

Based on the procedures performed and the evidence obtained, the separate and consolidated financial statements of the Company and the Group for the year ended December 31, 2022, in XHTML format as well as the provided XBRL file («21380093P5MN4CJUHL68-2022-12-31-el.zip») with the appropriate mark-up on the above consolidated financial statements, have been prepared, in all material respects, in accordance with the requirements of the ESEF Regulatory Framework.

April, 20 April 2023
The Certified Accountant

Elpida Leonidou
I.C.P.A Reg.: 19801

Grant Thornton
Chartered Accountants Management Consultants
58, Katehaki Av., 115 25 Athens, Greece
Registry Number SOEL 127

C. Annual Board of Directors' Management Report

ANNUAL BOARD OF DIRECTORS' MANAGEMENT REPORT
OF THE COMPANY SIDMA STEEL S.A.
on the Financial Statements for the period from 1 January to 31 December 2022

C.1 Introduction

This Annual Report of the Board of Directors (hereinafter referred to as the "Report") refers to the financial year 2022 (1.1.2022-31.12.2022). The Report was drawn up and is harmonized with the relevant provisions of Law 4548/2018, and the provisions of Law 3556/2007 (Government Gazette 91A/30.4.2007), as amended, and the executive decisions issued thereon by the Capital Market Commission and in particular Decisions No. 8/754/14.4.2016 (Official Gazette 1345B/13.5.2016) and 1/434/3.7.2007 (Official Gazette 1222B/17.07.2007) of the Administrative Council of the Capital Market Commission. This Report contains, in a succinct, but understandable and substantial manner, the important individual thematic sections that are necessary, based on the above legislative framework, and truthfully depicts all the relevant information required by law, in order to derive a substantial and thorough information regarding the development and performance of the activities during the said period of time of the Company "SIDIREMPORIKI OF MACEDONIA SIDMA METALLURGIKI SA" (hereinafter referred to for brevity as "Company" or "SIDMA STEEL") its position, and the main risks and uncertainties it faces, as well as its subsidiaries included in the consolidation (the "Subsidiaries").

SIDMA STEEL is active in the processing and trade of Iron (Steel) and has the form of Société Anonyme with headquarters in the Aspropyrgos Branch (Mavri Giora), its internet address is www.sidma.gr and is listed on the Athens Stock Exchange (branch Base Metals). It also has branches in the following areas:
• Oreokastro (zip code 57013)
• Lamia (Industrial Park of Lamia, OT 4B, zip code 35100).

The present report contains in a brief, but substantive manner, all the important units, which are deemed necessary, based on the legal framework, and depicts in a truthful way all the relevant legally indispensable information, in order to provide substantive data regarding the operations performed by the Company "**SIDMA STEEL S.A.**" (hereinafter referred to as the "Company" or "SIDMA") as well as its subsidiaries within the aforementioned relevant time period.

The present report has been prepared according to the terms and conditions of the above-described legal framework, accompanies the financial statements of this period, and is included in its entirety in the Annual Financial Report for FY 2022.

Given that the Company also prepares consolidated financial statements, the present report is unified, while the main point of reference pertains to consolidated financial figures of the Company and its associates. As far as separate (non-consolidated) data of the parent company is concerned, reference is made only when it is considered necessary to better understand its content.

The units of the Report and their content are as follows.

C.2 Company Performance and Financial Position

2022 was a year marked by the energy crisis and soaring inflation, developments that forced governments and international monetary authorities to intervene. The former taking support measures, the latter increasing interest rates. Just recently, the European Central Bank proceeded to the first 0.5% interest rate increase (exceeding the 0.25% predictions) of the last ten years. In this environment, business conditions changed unfavorably, whereas money markets also suffered losses. Furthermore, during the last quarter of 2022, the Economic Climate Index in our country was also decreased by 1.2 points compared to the previous quarter. The outlook for the Industry and Construction sectors has consistently deteriorated during 2022, due to the increase of energy and other raw material prices, as well as due to challenges in the operation of international supply chains.[1]

In the above macro-economic context, **SIDMA Steel** registered an increase in turnover both at the parent and at the group level.

In particular, the consolidated turnover of **SIDMA Steel Group** recorded a 17.2% increase during 2022, amounting to €265.3 million, compared to €226.4 million in 2021. Taking into consideration dealer sales, it amounted to €314.0 million compared to €274.2 million in the previous year, registering a 14.5% increase. The increase in turnover is attributable to both the increased of the average sale price and sales volume and reflects the strong presence of the Group's companies in the markets in which they operate.
The earnings before interest, taxes, depreciation, and amortization (EBITDA) amounted to €17.8 million, compared to €27.1 million in 2021, recording a 34.5% decrease mainly due to a 36.7% decrease of the gross profit margin (from 15.3% in 2021 to 9.7% in 2022) and the subsequent decrease of the gross profits by €8.9 million (from €34.7 million in 2021 to €25.7 million in 2022) or by 25,8%. Regarding the decrease of the gross profit margin, it should be noted that whereas in 2021, due to the particular conditions created by the abrupt return of economies to rapid growth rates after the pandemic recession, the profit margins reached unusually high levels, during 2022, due to a slowing growth, they were limited within a "normality" range. Furthermore, the de-escalation of the prices of steel products, flat-steel products in particular, after their explosive rise during the first quarter of 2022 due to the Russian invasion in Ukraine, led to a further compression of the profit margins until the realignment of the sale prices with the average cost of stocks. Lastly, the profits before tax amounted to €9.8 million, compared to €31.7 million in 2021. However, these figures include the impact of the accounting treatment of the refinancing of the Company's loan liabilities, consisting of the reporting of the loan liabilities at fair value. Subtracting the impact of said accounting treatment, the profits before tax amounted to €11.4 million in 2022 and €19.3 million in 2021, recording a 40.9% decrease (for more details see note 8.24). It should be noted that whereas gross profits were decreased by €8.9 million, the decrease in net profit before tax was limited to €7.9 million.

At the **company level**, the turnover of SIDMA Steel in 2022 increased to €173.0 million from €150.1 million, registering a 15.3% increase, whereas, taking into consideration dealer sales, it amounted to €221.7 million compared to €197.9 million in 2021, presenting a 12.1% increase. The earnings before interest, taxes, depreciation, and amortization (EBITDA) amounted to €12.7 million, compared to €20.2 million in 2021, mainly due to a 37% decrease of the gross profit margin, whereas the profits before tax amounted to €5.8 million, compared to €26.4 million in 2021. Without taking into consideration the impact of the aforementioned accounting treatment of the refinancing of the Company's loan liabilities, the profits before tax in 2022 amounted to €7.4 million, whereas the comparable figure of 2021 amounted to €13.9 million.

Regarding Balkan subsidiaries, the exceptional performance of **SIDMA Bulgaria** is worthy of note, achieving a 25% increase in turnover, from €44.6 million to €55.7 million, with an average sale price increased by 14.4% compared to 2021. The company's EBITDA amounted to €3,184 thousand,

[1] GREEK ECONOMY, ISSUE 4/22 Foundation for Economic & Industrial Research (IOBE)

compared to €3,505 thousand in 2021, recording a 9.1% decrease, whereas the profit before tax amounted to €2,604 thousand compared to €2,970 thousand during the previous fiscal year.

SIDMA Romania also recorded a 16% increase in turnover, amounting to €37.8 million compared to €32.7 million in 2021, mostly due to an increase of the volume of sales, given the fact that the average sale price increased by only 3.7%. Its EBITDA amounted to €1,911 thousand compared to €3,478 thousand in 2021, whereas the profit before tax amounted to €1,405 thousand compared to €2,411 thousand during the previous fiscal year. As in the previous case, the decreased performance is attributable to the decrease of the profit margin by 31% compared to the previous fiscal year (from 14.3% to 8.6%), which led to a €1,437 thousand decrease of the gross profit.

Lastly, regarding the **Group's financial position**, it is noted that the Company's equity amounted to €29.8 million, whereas the capital structure and debt service indicators, as of 31.12.2022, were as follows:

- Net Debt to Equity Ratio = 2.2
- Interest Coverage Ratio (EBITDA/Net Interest) = 4.0

At the end of 2022, the Group's liquidity amounted to €8.5 million, whereas its loan liabilities were reduced by 4% or €3.3 million.

C.3 Alternative Performance Measures

The Company uses Alternative Performance Measures (APMs) in decision-making about its financial, operational, and strategic planning, as well as when evaluating and publishing its performance. These APMs serve to understand the financial and operating results of the company, its financial position, and cash flow in a better way. Alternative measures (APMs) should always be considered in conjunction with the financial results prepared under IFRS and under no circumstances replace them.

To evaluate the performance of the Group and the Company, figures such as Total Turnover, Gross Profit, Profits before taxes and EBITDA (Operating Profits before taxes, interest, investment results and depreciation) are used as well as indicators such as the Gross Profit Margin, the EBITDA Margin, the Net Profit Margin, the General Liquidity Ratio, the Net Debt to Equity Ratio and the Interest Coverage Ratio.

The Total Turnover, which in addition to sales of own products also includes agency (consignment) sales, is monitored as an indication of the company's market share in the market in which it operates.

Profitability ratios, as a percentage of profit on sales revenue remaining after subtracting a. the cost of goods sold (Gross Profit Margin) and b. operating expenses (EBITDA Margin), respectively, are monitored to assess the coverage of operating expenses on the one hand and interest, depreciation, taxes, and other financial expenses on the other.

The General Liquidity and Interest Coverage Ratios are monitored as they are part of the obligations arising from the company's bond loan programs, following the issuance of Joint Bond Loans of € 76.8 million from 5.02.2021, and are calculated from the ratio of current assets to short-term liabilities and the ratio of operating profitability - EBITDA - to net financial expenses respectively. Net Financial Expenses refers to financial expenses minus Financial income.

The Net Debt-to-Equity Ratio tracks the shareholders' ability to meet their debt obligations and is calculated as the company's total borrowings minus the company's cash-to-equity ratio.

SIDMA STEEL S.A.

All the above numbers, used in the Alternative Performance Measurement Indicators appear in the company's Financial Statements.

The main APMs for the Group and the Company for the year 1.1 - 31.12.2022 are as follows:

Group	01.01 - 31.12.2022	01.01 - 31.12.2021	Δ (%)
Turnover	265.304.207	226.409.561	17,2%
Consignment Sales	48.744.515	47.848.764	1,9%
Total Sales	**314.048.722**	**274.258.325**	**14,5%**
Gross Profit Margin	25.737.100	34.663.680	-25,8%
Earnings before taxes	9.797.595	31.717.903	-69,1%
EBITDA	17.750.391	27.118.699	-34,5%

Company	01.01 - 31.12.2022	01.01 - 31.12.2021	Δ (%)
Turnover	173.022.520	150.068.051	15,3%
Consignment Sales	48.744.515	47.848.764	1,9%
Total Sales	**221.767.035**	**197.916.815**	**12,1%**
Gross Profit Margin	19.040.752	26.113.903	-27,1%
Earnings before taxes	5.811.383	26.361.346	-78,0%
EBITDA	12.677.348	20.164.507	-37,1%

The calculations for the Alternative Performance Indicators of the Company and the Group are analysed as follows:

Group	01.01 - 31.12.2022	01.01 - 31.12.2021	Δ (%)
Gross Margin			
(Gross Profit/ Turnover)	9,70%	15,31%	-5,6%
EBITDA Margin:			
(EBITDA/ Turnover)	6,69%	11,98%	-5,3%
Net Profit Margin			
(Profit before Tax / Turnover)	3,69%	14,01%	-10,3%
Net Debt-to-Equity Ratio			
(Net Debt / Equity)	3,2	5,4	-219,3%
Liquidity Ratio			
(Current Assets/Current Liabilities) (1)	1,6	1,6	-1,0%
Interest cover ratio			
(EBITDA / Net Interest) (2)	4,5	6,5	-31,2%

Company	01.01 - 31.12.2022	01.01 - 31.12.2021	Δ (%)
Gross Margin			
(Gross Profit/ Turnover)	11,00%	17,40%	-6,4%
EBITDA Margin:			
(EBITDA/ Turnover)	7,33%	13,44%	-6,1%
Net Profit Margin			
(Profit before Tax / Turnover)	3,36%	17,57%	-14,2%
Net Debt-to-Equity Ratio			
(Net Debt / Equity)	2,2	2,3	-16,8%
Liquidity Ratio			
(Current Assets/Current Liabilities) (1)	1,7	1,6	7,6%
Interest cover ratio			
(EBITDA / Net Interest) (2)	3,7	6,3	-40,8%

(1) For the calculation of Liquidity Ratio, Short-term Liabilities do not include Long-term liabilities payable in the next financial year.

(2) Net Interest includes interest expense as analysed in note 8.24 Financial cost.

C.4 Significant Events During 2022

The important events that took place in the year from 1 January to 31 December 2022 as well as their effect on the financial statements are as follows:

A. Regular General Meeting

The Regular General Meeting of the company's shareholders, held in Athens on June 2, 2022, was attended by representatives of 82.69% of the Share Capital and voting rights and the following decisions were unanimously approved:

- Annual Financial Statements of FY 2021, with the relevant Reports of the Board of Directors and the Certified Public Accountants, as well as the non-payment of dividend due to the absence of profits for distribution, according to Article 160 par. 2 of Law 4548/2018.
- overall management applied by the Board of Directors during the year 2021, as well exempting the Certified Public Accountants from any liability for compensation for the operations of FY 2021 in accordance with article 117 par. 1 (c) of Law 4548 / 2018.
- Payment of remuneration and compensation of the members of the Board of Directors for 2021, as well as pre-approval of the payment of remuneration and compensation of the members of the Board of Directors for 2022 according to Article 109 of Law 4548/2018.
- The Company's Remuneration Report for the period 01/01/2021 to 31/12/2021, according to Article 112 of Law 4548/2018.
- Appointment of Certified Public Accountants and approval of their remuneration for 2022.
- Granting permission to members of the Company's Board of Directors and the General Management to participate in the Boards of Directors or in the Management of affiliates.
- Appointment of the new Board of Directors.

Finally, during the General Meeting, the Company Shareholders were informed by Dr Michael Samonas, Group CFO and member of the board about:

- The annual report of the activities of the Audit Committee for the FY 2021.
- The report of the Independent Non-Executive Members of the Board of Directors for the FY 2021.

C.5 Risk Management

Following is the description of the most significant financial risks and uncertainties that the Group could address:

(a) Macroeconomic Environment

The risk of the Macroeconomic environment is linked to the possible inability to correctly predict the fluctuations of the macroeconomic factors that affect the operation of the Group such as inflation, GDP, economic development, etc., and could potentially lead to financial loss.

For example, a slow deceleration of inflation may lead the European Central Bank to further interest rate increases with negative effects on the financial stability of the Group. Investment plans may be delayed, and the economic activity of the country could slow down.

However, referring to Greece's finances, the rating agency Moody's restated its forecast that the GDP will grow by 1.8% in 2023 and 1.7% in 2024. At the same time, it estimates that the main axis of support for the Greek economy will remain tourism and the strong performances he will record again this year. It underlines, in fact, that the operating environment will be favorable in 2023-24, with economic and credit growth in Greece remaining higher than other EU countries thanks to the funds from the Recovery Fund.

In any case, the Group's management constantly monitors developments in the macroeconomic environment through presentations by credit rating agencies, such as S&P and Moody's, as well as financial analysis and investment strategy departments of banks in Greece and abroad. It also monitors, through monthly meetings with the heads of the subsidiaries/Business Units, the developments in the market and the macroeconomic risks of each state in which it operates, which could negatively affect the demand for the products and, by extension, its turnover.

(b) Credit Risk

The Parent company as well as its subsidiaries have a policy to insure their credit sales through insurance companies and, therefore, no significant concentrations of credit risk are generated. Wholesale sales are mainly made to customers with an appropriate credit history. In 2022, no customer participated in the turnover by more than 2.5%, while there was dispersion to many customers. Retail sales are made in cash. On 31.12.2022, the Management believes that there is no material credit risk exposure that has not already been covered by provisions for bad debts. It has also organized a credit control department, charged with assessing the creditworthiness of its customers as well as determining their credit limits. The Group's exposure to credit risk is limited to financial assets, which are as follows:

	Group		Company	
Financial Assets	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Cash and cash equivalents	8.481.728	12.724.447	1.757.487	11.430.821
Trade and other receivables	67.155.342	66.295.886	57.984.549	55.336.089
Derivatives	1.428.312	-	1.428.312	-
Total	**77.065.382**	**79.020.333**	**61.170.348**	**66.766.911**

(c) Interest Rate Risk

The interest rate risk mainly arises from long-term and short-term loans. Loans with variable interest rates expose the Group to cash flow risk. The Group does not consider a rapid increase in Euribor interest rates being possible given the economic situation and development prospects of the Eurozone countries and therefore it has not carried out any interest rate risk management transactions.

The table shows the sensitivity to the Period Results and the Stockholders' Equity in case of a possible change in the Group's interest rates by +/- 1%.

	Group				Company			
	Effect to P & L		Effect to Equity		Effect to P & L		Effect to Equity	
amounts in thousand €	**+1%**	**-1%**	**+1%**	**-1%**	**+1%**	**-1%**	**+1%**	**-1%**
31st December 2022	(1.058.387)	1.058.387	(1.058.387)	1.058.387	(924.798)	924.798	(924.798)	924.798
31st December 2021	(1.109.994)	1.109.994	(1.109.994)	1.109.994	(937.545)	937.545	(937.545)	937.545

(d) Liquidity Risk

The Company’s financial statements have been prepared based on the going concern principle.

As at 31.12.2022 the Group maintained cash available of € 8.5 million as it regularly ensures that its net borrowings do not exceed 90% of its loan liabilities. In addition, liquidity management is achieved by combining approved borrowing through factoring with or without recourse. During 2022, the Company used, on average, factoring financing of approximately € 30 million, while on 31.12.2022 it had available lines of € 21 million. In addition, the working capital of both the Group and the company amounts as of to 31.12.2022 to € 52 million and € 46 million respectively.

The maturity of the Group's financial liabilities is as follows:

	Group							
	31.12.2022				31.12.2021			
Group	Up to 6 months	6-12 months	1-5 years	More than 5 years	Up to 6 months	6-12 months	1-5 years	More than 5 years
Long-term borrowings	15.454.734	9.514.128	15.406.264	50.108.475	16.794.082	4.729.420	30.681.667	43.147.899
Trade Payables	49.067.150	-	-	-	49.642.947	-	-	-
Other Payables	3.174.845	-	-	-	5.529.628	-	-	-
Total	**67.696.729**	**9.514.128**	**15.406.264**	**50.108.475**	**71.966.657**	**4.729.420**	**30.681.667**	**43.147.899**
Discounting of loan obligations under IFRS 9	(772.428)	(777.191)	(5.825.064)	(4.028.701)	(787.307)	(792.742)	(5.985.310)	(5.417.725)
Total	**66.924.301**	**8.736.937**	**9.581.200**	**46.079.774**	**71.179.350**	**3.936.678**	**24.696.357**	**37.730.174**

	Company							
	31.12.2022				31.12.2021			
Group	Up to 6 months	6-12 months	1-5 years	More than 5 years	Up to 6 months	6-12 months	1-5 years	More than 5 years
Long-term borrowings	15.154.734	2.879.191	13.698.439	45.607.975	15.208.196	2.712.464	21.750.823	41.532.356
Trade Payables	35.071.059	-	-	-	38.136.132	-	-	-
Other Payables	2.496.953	-	-	-	4.911.450	-	-	-
Total	**52.722.745**	**2.879.191**	**13.698.439**	**45.607.975**	**58.255.778**	**2.712.464**	**21.750.823**	**41.532.356**
Discounting of loan obligations under IFRS 9	(772.428)	(777.191)	(5.825.064)	(4.028.701)	(787.307)	(792.742)	(5.985.310)	(5.417.725)
Total	**51.950.317**	**2.102.000**	**7.873.375**	**41.579.274**	**57.468.470**	**1.919.722**	**15.765.513**	**36.114.631**

(e) Risk of Fluctuation of Raw Material Prices

The sale prices of the manufactured products are largely dictated by the prices of the raw material. The fluctuations in the international prices of steel products affect (positively or negatively) the Group's profit margin, since the fluctuation of the sale prices of the products cannot be entirely synchronized with the prices of our not yet received orders and the prices of our inventory. The Group's gross profit margin is positively affected in case of increasing prices of the raw materials and negatively otherwise. The fluctuation of the prices of the products marketed by the Group cannot be covered by hedging, therefore its earnings are affected accordingly due to devaluation or overvaluation of the inventory.

Indicatively we report that during a four-year period, from January 2018 to December 2022, the difference between the maximum and minimum CIF price of three of the most important products of the Group, as well as the standard deviation, are as follows:

€ / MT	Hot Rolled Materials	Cold Rolled Materials	Galvanized Materials
Minimum to Maximum Value Difference	781	844	788
Standard Deviation	200	235	230

Correspondingly, the gross profit margin had fluctuations of the order of 787 base points between maximum and minimum prices. An increase of the prices corresponds to an increase of the gross profit %, without being able to quantify the exact ratio between them. For every 50 base points of fluctuation of the gross profit %, the effect on the 2022 and 2021 earnings would be approximately:

GROUP	2022		2021	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	1.326	-1.326	1.132	-1.132
Equity	1.326	-1.326	1.132	-1.132

COMPANY	2022		2021	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	865	-865	750	-750
Equity	865	-865	750	-750

(f) Currency Risk

The Group operates in Europe and therefore the bulk of its transactions is carried out in Euros. However, for the small part of the Group's goods purchases made in US Dollars, the Group carries currency forward contracts.

In addition, the Group is exposed to currency risks from investments in foreign countries. Specifically, for the subsidiary in Romania, as a natural hedge the Group's policy is to use borrowings in the respective currency - whenever this is possible - to reduce exposure to risk in case of devaluation of local currency against the Euro. The foreign exchange risk problem does not apply to the Bulgarian subsidiary because its currency is locked against the euro.

The tables with the remaining receivables and liabilities in Foreign Currency for the Group are as follows:

The change in the results and the Stockholders' Equity of the Group from a possible change +/-(10%) in the foreign currency exchange rate is as follows:

	Group			
	31.12.2022		31.12.2021	
amounts in €	**USD**	**RON**	**USD**	**RON**
Financial Current Assets	-	1.015.494	836.646	10.743.824
Financial Liabilities	(18.872)	-	-	-
Short-term elements	**(18.872)**	**1.015.494**	**836.646**	**10.743.824**
Financial Current Assets	-	-	-	-
Financial Liabilities	-	-	-	-
Long-term elements	-	-	-	-

	31.12.2022			
	+ 10%	- 10%	+ 10%	- 10%
amounts in €	**USD**		**RON**	
Profits (losses) before taxes	3.791	440	(128.148)	155.616
Equity	3.791	440	(345.881)	422.744

	31.12.2021			
	+ 10%	- 10%	+ 10%	- 10%
amounts in €	**USD**		**RON**	
Profits (losses) before taxes	(76.059)	92.961	(221.761)	271.041
Equity	(76.059)	92.961	(218.485)	267.037

C.6 Objectives and Prospects for 2023

Even though the international financial environment remains particularly volatile and full of uncertainties, the Greek economy will continue to grow in 2023, even if at slower rates.

Tourism figures give rise to realistic expectations for new arrival and revenue records, consumption remains strong, despite the decline in real income due to inflation, and the construction sector maintains the momentum of the previous two years unabated.

However, soon it is expected that investments and exports, with the financial support of the Recovery and Resilience Facility and the Partnership Agreement for the Development Framework (ESPA) will be the driving force behind the growth rates of economic activity.

Furthermore, the expected, within the year, upgrade of the country's credit rating to "investment grade", for the first time since the financial crisis, is also expected to play an important role that could lead to a significant increase in foreign investment inflows.

In view of the foregoing, and assuming that no unforeseen disruptive events occur, and the rate hike cycle ends soon, SIDMA METAL is expected to continue its growth in 2023.

C.7 Significant Transactions between the Company and Related Parties

The most significant transactions of the Company with its related parties wihtin the meaning of IAS 24 are pressented below.

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Sale of goods/ services				
Subsidiaries	-	95.444	-	22.827
Other related parties	9.273.532	4.497.732	7.645.122	4.865.812
Total	**9.273.532**	**4.593.176**	**7.645.122**	**4.888.639**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Other income				
Subsidiaries	-	112.845	-	-
Other related parties	4.351.480	3.741.528	5.603.852	4.597.855
Total	**4.351.480**	**3.854.373**	**5.603.852**	**4.597.855**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Receivables				
Subsidiaries	-	58.548	-	2
Other related parties	2.505.965	1.818.962	3.405.001	2.969.168
Total	**2.505.965**	**1.877.510**	**3.405.001**	**2.969.170**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Purchase of goods / services				
Subsidiaries	-	-	-	24.297
Other related parties	54.209.114	15.474.301	38.966.780	11.488.941
Total	**54.209.114**	**15.474.301**	**38.966.780**	**11.513.238**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Other expenses				
Subsidiaries	-	-	-	-
Other related parties	1.208.766	1.178.616	1.155.700	1.120.945
Total	**1.208.766**	**1.178.616**	**1.155.700**	**1.120.945**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Trade and other payables				
Subsidiaries	-	-	-	141
Other related parties	28.501.172	17.238.589	33.356.026	21.761.194
Total	**28.501.172**	**17.238.589**	**33.356.026**	**21.761.335**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Purchase of fixed assets				
Subsidiaries	-	-	-	-
Other related parties	88.745	60.081	99.491	99.491
Total	**88.745**	**60.081**	**99.491**	**99.491**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Sale of fixed assets				
Subsidiaries	-	-	-	-
Other related parties	500.000	500.000	11.500.000	11.500.000
Total	**500.000**	**500.000**	**11.500.000**	**11.500.000**

Sales

	01/01-31/12/2022		01/01-31/12/2021	
Company	**Group**	**Company**	**Group**	**Company**
SIDENOR STEEL INDUSTRY SA	124.165	124.165	62.980	62.980
SOVEL AE	125.087	125.087	144.479	144.479
STOMANA ENGINEERING AD	53.197	-	47.509	-
ETIL SA	108.217	108.217	98.005	98.005
ERLIKON WIRE PROCESSING S.A.	56.427	56.427	65.912	65.912
AEIFOROS SA	7.343	7.343	75.649	6.514
SIDMA BULGARIA	-	71.885	-	-
ELVALHALCOR S.A	923.477	923.477	1.211.352	1.211.352
CORINTH PIPEWORKS S.A.	427.827	427.827	69.598	69.598
ATTICA METALIC WORKS S.A.	785.215	785.215	676.898	676.898
TEKA SYSTEMS AE	13.853	13.853	50.317	50.317
ANTIMET S.A.	678.186	678.186	883.811	883.811
HELLENIC CABLES S.A.	78.823	78.823	38.274	38.274
ETEM S.A	-	-	4.535	4.535
VIOMAL S.A.	177.069	177.069	311.083	311.083
SIDMA Romania S.R.L.	-	23.559	-	22.827
ANAMET S.A.	19.307	19.307	21.461	21.461
FITCO AE	-	-	14.514	14.514
STOMANA	4.392.151	-	2.338.992	-
DIA.VI.PE.THI.V. SA	-	-	301	301
SYMETAL S.A	362.101	362.101	161.562	161.562
SIDERAL SHPK	-	-	-	-
DOJRAN STEEL LTD	243.775	243.775	63.153	63.153
FULGOR AE	348.626	348.626	607.904	607.904
ECORESET A.E.	11.183	11.183	15.413	15.413
ERGOSTEEL	1.605	1.605	154.056	154.056
EPIRUS METALWORKS SA	-	-	162.868	162.868
ICME ECAB SA	154.463	-	205.811	-
AEIFOROS BULGARIA S.A.	55.002	-	-	-
ANOXAL S.A.	5.191	5.191	40.823	40.823
SOFIA MED AD	120.988	-	117.862	-
CABLEL WIRES SA	253	253	-	-
Σύνολο	**9.273.532**	**4.593.176**	**7.645.122**	**4.888.639**

Sale of fixed assets

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
ELVALHALCOR S.A.	500.000	500.000	11.500.000	11.500.000
Σύνολο	**500.000**	**500.000**	**11.500.000**	**11.500.000**

Other Incomes

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
SIDENOR STEEL INDUSTRY SA	2.226.919	2.226.919	1.806.124	1.806.124
SOVEL AE	-	-	1.150	1.150
STOMANA	-	-	622.466	-
ETIL S.A.	-	-	300	300
ERLIKON WIRE PROCESSING S.A.	194.263	194.263	307.245	307.245
SIDMA BULGARIA	-	54.405	-	-
ELVALHALCOR S.A.	526.359	526.359	1.749.950	1.749.950
CORINTH PIPEWORKS S.A.	788.259	788.259	718.552	718.552
TEKA SYSTEMS AE	106	106	188	188
HELLENIC CABLES S.A.	500	500	-	-
ETEM AE	-	-	220	220
SIDMA Romania S.R.L.	-	58.440	-	-
ANAMET S.A.	13.142	62	24	24
FULGOR S.A.	4.570	4.570	9.839	9.839
ECORESET S.A.	369	369	1.772	1.772
ERGOSTEEL S.A.	70	70	1.200	1.200
SIDEROM STEEL SRL	596.871	-	383.530	-
ANTIMET S.A	-	-	140	140
ANOXAL S.A.	50	50	1.151	1.151
SYMETAL S.A.	3	3	-	-
Σύνολο	**4.351.480**	**3.854.373**	**5.603.852**	**4.597.855**

Other expenses

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
ELVALHALCOR S.A.	21.751	21.751	6.538	6.538
TEKA SYSTEMS S.A.	90.225	67.711	83.314	65.279
ANTIMET S.A.	102.713	102.713	95.341	95.341
VIEXAL S.A.	3.677	3.478	1.897	1.897
Steelmet Property Services S.A.	5.929	5.929	6.297	6.297
METALCO BULGARIA S.A.	4.145	-	13.721	-
METALIGN	289.828	289.828	299.641	299.641
VIENER S.A.	667.705	667.705	645.684	645.684
SIDENOR STEEL INDUSTRY SA	-	-	268	268
ICME ECAB SA	3.292	-	2.998	-
STEELMET SERVICES	19.501	19.501	-	-
Σύνολο	**1.208.766**	**1.178.616**	**1.155.699**	**1.120.945**

Purchases

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
SIDENOR STEEL INDUSTRY SA	804.888	804.888	500.891	500.891
STOMANA	37.350.888	13.546.711	27.764.478	10.500.214
ERLIKON WIRE PROCESSING S.A.	21.980	21.980	17.722	17.722
CORINTH PIPEWORKS S.A.	675.122	675.122	111.180	111.180
SIDMA Romania S.R.L.	-	-	-	24.297
ELVALHALCOR S.A.	414.155	414.155	339.658	339.658
LESCO LTD	11.444	11.444	19.276	19.276
SIDEROM STEEL SRL	14.930.636	-	10.213.575	-
Σύνολο	**54.209.114**	**15.474.301**	**38.966.780**	**11.513.238**

Purchase of fixed assets

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
TEKA SYSTEMS S.A.	48.464	19.800	50.057	50.057
VITROUVIT SA	-	-	2.665	2.665
ETIL S.A.	38.435	38.435	26.705	26.705
HELLENIC CABLES S.A.	-	-	20.065	20.065
STEELMET SERVICES	1.846	1.846	-	-
Σύνολο	**88.745**	**60.081**	**99.491**	**99.491**

Payables

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
SIDENOR STEEL INDUSTRY SA	10.014.192	9.978.058	10.826.574	10.826.574
STOMANA S.A.	8.415.403	2.043.127	9.154.593	3.337.918
ETIL S.A.	3.025	3.025	32.373	32.373
ERLIKON WIRE PROCESSING S.A.	618.759	618.759	1.231.501	1.231.501
SIDMA BULGARIA S.A.	-	-	-	141
ELVALHALCOR S.A.	52.720	52.720	20.365	20.365
CORINTH PIPEWORKS S.A.	4.444.831	4.377.215	6.107.221	6.107.221
TEKA SYSTEMS S.A.	28.074	26.462	41.522	38.039
ANTIMET S.A.	47.285	47.285	49.758	49.758
VITROUVIT SA	-	-	(78)	(78)
Etem Gestamp Aluminium Extrusions	1.876	1.876	1.876	1.876
VIENER S.A.	82.733	82.733	90.474	90.474
LESCO LTD	11.444	11.444	-	-
ICME ECAB SA	167	-	255	-
SIDEROM STEEL SRL	4.784.578	-	5.774.420	-
HELLENIC CABLES S.A.	-	-	24.880	24.880
VIEXAL S.A.	1.086	888	291	291
STEELMET SERVICES	(5.001)	(5.001)	-	-
Σύνολο	**28.501.172**	**17.238.589**	**33.356.026**	**21.761.335**

Receivables

Company	01/01-31/12/2022 Group	01/01-31/12/2022 Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company
SIDENOR STEEL INDUSTRY SA	115.658	115.658	64.128	64.128
SOVEL S.A.	49.286	49.286	61.403	61.403
STOMANA ENGINEERING AD	13.819	-	7.156	-
ETIL S.A.	60.726	60.726	34.084	34.084
ERLIKON WIRE PROCESSING S.A.	3.051	3.051	14.920	14.920
EPIRUS METALWORKS SA	-	-	(82)	(82)
AEIFOROS SA	2.490	2.490	2.540	-
ELVALHALCOR S.A.	87.849	87.849	737.181	737.181
CORINTH PIPEWORKS S.A.	171.027	171.027	34.999	34.999
ANTIMET S.A.	1.015.996	1.015.996	1.280.311	1.280.311
HELLENIC CABLES S.A.	9.597	9.597	3.919	3.919
VIOMAL S.A.	37.994	37.994	63.124	63.124
SIDMA BULGARIA	-	26.059	-	-
SIDMA Romania S.R.L.	-	32.487	-	-
ANAMET S.A.	16.132	16.132	6.036	6.036
SIDMA WORLDWIDE (CYPRUS) LIMITED	-	2	-	2
SYMETAL S.A.	71.603	71.603	106.291	106.291
PROSAL TUBES SA	30	30	30	30
FULGOR S.A.	80.257	80.257	276.604	276.604
ECORESET S.A.	4.275	4.275	2.975	2.975
ERGOSTEEL S.A.	1	1	(276)	(276)
ETEM BULGARIA SA	-	-	(1)	(1)
SOFIA MED AD	19.202	-	44.906	-
ETEM SH.P.K.	-	-	(1.066)	(1.066)
ICME ECAB SA	9.830	-	53.156	-
SIDEROM STEEL SRL	641.742	-	328.075	-
TEKA SYSTEMS S.A.	-	-	1.218	1.218
ETEM S.A	-	-	5.031	5.031
ANOXAL S.A.	1.175	1.175	6.039	6.039
ATTICA METALIC WORKS S.A.	90.281	90.281	272.300	272.300
METALCO BULGARIA S.A.	2.410	-	-	-
CABLEL WIRES SA	1.535	1.535	-	-
Σύνολο	**2.505.965**	**1.877.510**	**3.405.000**	**2.969.170**

Apart from the following, there are no receivables or liabilities with members of the Board of the company or its management.

	Group 1.1-31.12.2022	Group 1.1-31.12.2021	Company 1.1-31.12.2022	Company 1.1-31.12.2021
Management Fees (short-term)	821.698	807.617	580.743	547.865
Board of Directors fees (short-term)	56.142	63.617	36.620	45.800
Total	**877.840**	**871.234**	**617.363**	**593.665**

C.8 Post Balance Sheet Events

There are no other events after 31.12.2022 that significantly affect the financial situation and the results of the Group and the Company except the following:

The Company sold in February 2023 the interest rate swap it had contracted with the National Bank of Greece and Piraeus Bank. The Company had bought, last year, two interest rate risk hedging products until the maturity of the long-term loans of a total amount of € 10 million. From the am sale (closing of the position) the company collected approximately € 1.3 million.

C.9 Corporate Governance Statement

This Corporate Governance Statement is prepared in accordance with article 152 of Law 4548/2018 and articles 14 and 18 of Law 4706/2020, as in force and the Part E "Structure of the Corporate Governance Code" of the Hellenic Corporate Governance Code which was published on June 2021 by the Hellenic Corporate Governance Council (ESED).

The Corporate Governance Statement is part of the Annual Management Report of the Company's Board of Directors. Reference date of the Corporate Governance Statement is 31st December 2022.

C.9.1. Corporate Governance Code

The Company, by virtue of its Board of Directors' decision dated 01.07.2021, decided the adoption and implementation of the Corporate Governance Code issued in July 2021 by the Hellenic Corporate Governance Council (HCGC), as recognized by the Board of Directors of the Hellenic Capital Market Commission at its 916th/7.6.2021 meeting as National Recognized Body for the issue of Corporate Governance Code, pursuant to the provisions of Law 4706/2020 and the Decision nr. 2/905/3.3.2021 of the Hellenic Capital Market Commission's Board of Directors (which is available at the company's website https://sidma.gr/wp-content/uploads/2023/01/CodeofConduct_gr_v7.pdf

Deviations from the Hellenic Corporate Governance Code and justification thereof. Special provisions – practices of the Code for listed companies not applied by the Company and explanation for the non-application thereof.

Firstly, the Company hereby attests that it complies, strictly and without exception, with all requirements of Greek law that constitute compelling law corporate governance regulations (laws and regulatory decisions of the Capital Market Commission) that apply to the Company as a company limited by shares traded only in an organized market in Greece.

Said minimum requirements are incorporated, as of the date hereof, in the aforementioned Hellenic Corporate Governance Code issued on June 2021 by the Hellenic Corporate Governance Council (HCGC), which the Company has adopted and applies. However, in addition to the minimum requirements, the Code also includes a series of special practices governed by the principle "Comply or Explain", which requires companies applying the Hellenic Corporate Governance Code, issued on June 2021 by the Hellenic Corporate Governance Council (HCGC), to either comply with all its provisions, or to explain the reasons for their non-compliance with its specific special practices.

The Company deviates from or does not apply in their entirety certain provisions of the Code on "Special Practices for listed companies", to the extent it is allowed by applicable law, taking into consideration the size, scope and complexity of the activities and the shareholding structure of the company. Said deviations, with a reference to the number of the relevant special practice of the Code at the end of each paragraph, are listed in detail below:

Part A – First Section: Role and Responsibilities of the Board of Directors

a) There is no need for regular meetings between the Chairman of the Board of Directors and the non-executive members thereof, without the presence of executive members to discuss the performance and remuneration of the latter, given the fact that all relevant matters are discussed in the presence of all members of the Board of Directors (Part A, 1.13).
b) The Board of Directors has not established an independent Internal Regulation, describing at least the manner in which it meets and takes decisions and the procedures it follows, given the fact that the manner in which it meets and takes decisions and the procedures it follows is regulated in detail by the Company's Internal Regulation and Law 4548/2018 in a manner that does not deviate from the Code's principles (Part A, 1.15 and 1.16).
c) The Board of Directors has not adopted an annual action plan for the year 2022 because the members of the Board of Directors communicate regularly regarding the Company's management matters. The Company will review the relevant practice and will adopt an annual action plan for 2023, if deemed necessary for an optimal organization of the Board of Directors' duties (Part A, 1.17).

Part A – Second Section: Size and Composition of the Board of Directors

a) The Company's regulations do not provide for the application of the diversity criteria to senior managers and staff in addition to the members of the Board of Directors, with specific representation objectives per gender and timetables for achieving them. According to the Company's suitability policy, the Company implements a diversity policy aiming to promote an appropriate diversity level in the Board of Directors and a diverse group of members. The diversity of views and experiences in order take correct decision is ensured by selecting a wide range of skills and qualifications during the selection of the members of the Board of Directors. The Suitability Policy is included/cited in the diversity policy, to ensure that it has been taken into consideration during the appointment of new members of the Board of Directors. The sufficient representation per gender, amounting to 25% of the Board of Directors members, is expressly provided and based on the current ten-member Board of Directors the minimum number of men or women is two (2) and absolutely no exclusions based on gender, race, color, ethnic or social origin, religion or belief, wealth, birth, disability, age or sexual orientation are applied. The Company reviews and examines the terms and conditions for further specialization and extension of the scope of said diversity criteria to the Company's managers, as well as the relevant objectives and timetables for implementing any relevant changes of the Suitability and Reliability Policy, despite estimating that said deviation does not pose any risk, for the period it remains applicable (Part A, 2.2.15).
b) The selection criteria of the Board of Directors do not require that the Board of Directors, collectively, can understand and manage issues related to the environment, social responsibility and governance (ESG19), within the framework of the strategy it adopts, because the Company has no such legal obligation (Part A, 2.2.16).
c) Even though the suitability policy includes an explicit reference to the obligation of the members of the Board of Directors to devote sufficient time to the performance of their duties, it does not place any restrictions on the total number of positions that the members of the Board of Directors may hold in other companies. It should be noted that to date there has been no failure of the members of the Board of Directors to devote the time required by their position, given the fact that every prospective member of the Board of Directors is obligated to disclose to the Company, prior to their appointment, the number of positions they hold as members of the Board of Directors in other companies, the relevant capacities they hold concurrently as well as any other professional or

personal commitments and circumstances, which are thoroughly assessed before the selection of a candidate and their appointment (Part A, 2.2.17).

d) The Chair is not elected by the independent non-executive members. The Board of Directors does not appoint an independent Vice-Chair from its independent members, but a non-executive Vice-Chair, given the fact that the Chair of the Board of Directors is a non-executive member and a different person from the Managing Director (Part A, 2.2.21 and 2.2.22).
e) The company does not have a framework for the succession of the members of the Board of Directors and managers, because the Company could promptly cover the relevant positions with persons from other companies of the Group with activities like the Company's activities, as evidenced by its relevant practice in the past. Specifically, regarding the Managing Directors, the Company has not adopted a succession plan because it has enough experienced executive members of the Board of Directors that could replace the current Managing Director at any time (Part A, 2.3.1, 2.3.2, 2.3.3 and 2.3.4).
f) The term of office of the members of the remuneration and nomination committee shall coincide with the term of office of the Board of Directors, with the possibility of its renewal. In any case, their term of office in the Committee shall not exceed nine (9) years in total (Part A, 2.3.12 and 2.4.11).
g) There is no provision regarding the maturity of the preemptive rights in a period not less than three (3) years from the date of their granting to the executive members of the Board of Directors because the Company has not adopted a relevant scheme (Part A, 2.4.13).
h) The contracts of the executive members of the Board of Directors do not provide that the Board of Directors may require the refund of all or part of the bonus awarded, due to breach of contractual terms or incorrect financial statements of previous years or generally based on incorrect financial data, used for the calculation of this bonus, because the Company's contracts with the executive members of the Board of Directors do not provided for bonuses (Part A, 2.4.14).
i) The additional remuneration of members of the Board of Directors participating in committees for reasons of transparency and information are not clearly visible in the remuneration report, or in their approval by the general meeting, because the members of the Board of Directors, to the extent they are remunerated, received fixed remuneration regardless of their participation in committees of the Board of Directors (Part A, 2.4.4).

Part A – Third Section: Functioning of the Board of Directors

a) Currently there is no provision for the support of the Board of Directors during the exercise of its duties by a capable, specialized, and experienced corporate secretary, because their main duties are performed by other departments of the Company (Part A. 3.2).
b) Given the fact that the Board of Directors collectively and the Chair, Vice Chair and the other members of the Board of Directors are evaluated annually with regard to the effective fulfillment of their duties in accordance with the provisions of the Company's Internal Regulation, their external evaluation is currently deemed unnecessary, because the Board of Directors has experienced and capable members with long experience in the sector in which the Company operates (Part A, 3.3.4).
c) There is no provision for the adoption of a continuous information and training program for the members on issues concerning the company because the persons recommended for appointment as members of the Board of Directors are persons that have sufficient and proven experience and/or organizational/management skills. However, the new members of the Board of Directors receive introductory information on issues concerning the Company and communicated regularly with the Company's management (Part A, 3.3.13).

Part B – Fifth Section: Sustainability

The Company does not apply any of the special practices of the fifth section "Sustainability". However, section 7.1 of the Internal Regulation specify that the Company has incorporated the Sustainable Development principles in its business activities and the way it operates, recognizing that said principles constitute a necessary condition for its long-term development (Part B, Fifth Section).

Part E – Guidelines for preparing the Corporate Governance Statement

The total remuneration of the Chair of the Board of Directors, the Managing Director and the members of the Board of Directors, executive or not, is approved by the General Meeting of the shareholders and sufficiently reported in the financial statements, in accordance with IAS 24. The remuneration report is not published in its entirety in the corporate governance statement (Part E).

C.9.2. Corporate governance practices adopted by the Company in addition to those provided by Law.

The Company complies, strictly and without exception, with the provisions of the legal framework on corporate governance and the Hellenic Corporate Governance Code issued on June 2021 by the Hellenic Corporate Governance Council (HCGC), with the deviations listed above. Currently no other practices are adopted, other than those specified in the aforementioned provisions.

C.9.3. Internal Control System

C.9.3.1 Key Elements of the Internal Control and Risk Management Systems

Internal Control System (ICS) is defined as the set of internal control mechanisms and processes, including risk management, internal control, and regulatory compliance, that covers every activity of the Company on a permanent basis and contributes to its safe and efficient operation. The Company's Internal Control System is not limited to the evaluation of the Company's activities but extends to the control of the activities of its important subsidiaries SIDMA Bulgaria and SIDMA Romania.

The Board of Directors ensures the adequate and efficient operation of the Company's Internal Control System, that the functions that constitute the Internal Control System are independent from the business sectors they control and that they have sufficient financial and human resources and the powers required to operate effectively. Furthermore, it ensures that the reporting lines and the division of responsibilities are clear, enforceable and documented in the Company's organization chart, included in the Company's Internal Regulation (article 3.2).

The Board of Directors, during its meeting conducted an annual review of the corporate strategy, main business risks and internal control systems and, taking into consideration the size, scope and complexity of the activities of the Company, found that (a) the Company's strategy is consistent with its corporate objectives and therefore does not require changes, (b) the processes for detecting and addressing the main business risks are adequate and (c) the internal control systems are adequate.

The key elements of the ICS implemented by the Company include the following:

(a) Control Environment

Includes all structures, policies and processes that provide the basis for the development of an efficient ICS, as it provides the framework and the structure to achieve the objectives of the ICS. The key elements of the Company's Control Environment include the following:

- Organizational Structure: The Company's organizational structure provides the framework for the design, performance, control and supervision of all corporate functions through an organization chart for all business units and operational activities, which delineates the main responsibility areas within the Company and establishes the appropriate reporting lines, in line with the Company's size and the nature of its operations. In this context, the Company has adopted, inter alia:
  i. complete and updated articles of association defining and clearly expressing the corporate object, works and main objectives.
  ii. an updated Internal Regulation with the minimum contents of article 14 of Law 4706/2020 describing the duties of the separate divisions of the Company, establishing the organization chart in full detail for all hierarchy levers, with a division of functions in main and secondary and defining the staff hiring and performance evaluation processes. The Company's Internal Regulation has been posted in the Company's website https://sidma.gr/wp-content/uploads/2021/11/CodeofConduct_gr_v5.pdf, in accordance with the provisions of article 14 par 2(b') of Law 4706/2020.
  iii. Audit Committee and Remuneration and Nomination Committee Bylaws.
  iv. Internal Control Unit Bylaws, defining the organizational structure and operation of Internal Control.
- Board of Directors: The Company's Board of Directors operates in accordance with the provisions of Law 4548/2018 and the Hellenic Corporate Governance Code, with any deviations listed herein. The Audit Committee and Remuneration and Nomination Committee adopt Bylaws as specified in Law 4706/2020.
- Corporate Responsibility: The Company's Internal Regulation includes the appropriate structures and clear reporting lines, areas of responsibility and competencies for the achievement of the Company's objectives.
- Human Resources: The Company's Operating Regulations and individual procedures provide for appropriate procedures for the recruitment and performance evaluation of the Company's managers and other personnel.

(b) Risk Management

The Company has a Risk Management Function, which is independent, and the Risk Manager reports to the Audit Committee.

The Risk Management Function is responsible for the prompt and appropriate detection of the risks that could potentially affect the achievement of the Company's strategic and operational objectives and the assessment and monitoring thereof. In this context:

- It monitors the appropriate implementation of the Risk Management Policy and the separate detailed policies regarding risks across the Company.
- Develops and implements appropriate methodologies for all risks related to the Company's activities, including models for the determination, assessment, monitoring, control, reporting and prediction of said risks.

- Determines the limits for every type of risk, monitors said limits and assesses the contribution of the Company's lines in the Risk Management process.
- Determines the criteria for the timely determination of the risks, at the separate and summary report level, and suggests appropriate processes and monitoring rules to address them.
- Suggests to the Board of Directors appropriate techniques for the containment of risks within acceptable levels.
- Regularly evaluates the adequateness of the processes for the detection, assessment and monitoring of risks and suggests corrective actions, when required.
- Performs stress tests, at least on an annual basis, based on specific scenarios, analyzes and reports the results and makes suggestions, when required.
- Participates in business decisions and relevant approval processes, where the Company assumes significant risks (e.g. new products, investments, participations) regarding matters and exposure that do not fall under the scope of predefined or general parameters;
- Monitors the overall composition and performance and suggests corrective actions, when necessary and
- Prepares reports to inform the Management on issues related to the Risk Management Policy, in collaboration with the Internal Control Unit.

(c) Risk Management in Relation to the Procedure of the Preparation of Financial Statement and Financial Reports

<u>Identification, evaluation, measurement and management of risks</u>: The identification and evaluation of risks is done mainly at the stage of preparation of the strategic planning and the annual business plan. The issues examined vary depending on the conditions of the market and the company and include indicatively developments and trends in the industry in which the company operates. The Board of Directors conducts annual review of the corporate strategy, the main business risks, and the Internal Control System.

<u>Planning and monitoring/Budget:</u> The progress of the company is monitored through detailed budget. The evolution of the financial figures of the company depends to a great extent on external factors that are the prices of raw materials and the market demand. For this reason, the course of the budget is regularly monitored and adjusted only in case of need, to take into account any significant changes of the above-mentioned factors. The Management monitors the evolution of the financial figures of the company through regular reports, comparisons with the budget as well as meetings of the management team.

<u>Safeguards for the process of preparing financial statements and financial reports</u>: The Company has established appropriate policies and procedures to manage all risks that may arise during the process of preparing financial statements and financial reports. As part of the procedures for preparing the Company's financial statements, specific safeguards exist and operate, which include the use of tools and methodologies commonly accepted in accordance with international practices. The main areas in which safeguards relating to the preparation of financial statements and financial statements of the Company operate are the following:

<u>Organization - Allocation of Responsibilities</u>: (i) The separation of responsibilities and powers related to the control, review and preparation of financial statements and financial reports is performed in such a way as to ensure the involvement of both the Company's senior Management and the middle and lower executives, and the enhancement of the effectiveness of safeguards, while safeguarding the required separation of responsibilities.(ii) The financial services are properly staffed with individuals possessing the necessary technical knowledge and experience for the responsibilities assigned to them.

<u>Procedures for accounting monitoring and preparation of financial statements</u>: (i) The Company trains and informs the staff in charge of the preparation of the Financial Statements. (ii) Automatic checks and

verifications are performed in relation various information systems. (iii) Management's judgments and estimates required for the preparation of the financial statements are reviewed at each financial reporting period, in relation to the risks identified.

Internal control procedures of the financial statements: The internal audit of the preparation of the financial statements is designed so that the statements of the management towards third parties and external auditors on the separate items of the financial statements are confirmed through specific procedures, which [separate items] are: For the Balance Sheet: the existence and ownership of the data, the completeness, the measurement and classification in accordance with the accounting framework.

For the Results: The existence of the transaction, the independence of the use, the completeness, the accuracy, and the classification based on the accounting framework.

Asset safekeeping procedures: The Company has established safeguards for the fixed assets, stocks, cash, cheques and other assets of the company, such as indicatively the physical cash and warehouse insurance, the inventory and comparison of measured quantities with those of the accounting books, the adequate asset security and other.

Policy for the Prevention and Management of Conflict of Interest

The Company's Internal Regulation establishes sufficient and effective procedures for the prevention, detection, and elimination of conflict-of-interest situations. The persons covered are obligated to inform the Internal Control Unit in the event they discover a situation of conflict of interest which conflicts with obligations arising from the policy for the prevention management and elimination of conflict of interest as well as any situation that could potentially cause a conflict of interest.

The Company implements appropriate mechanisms and procedures for the timely identification of conflicts of interest of the Board Members. and the Employees, either when assuming their duties or during the performance of their duties.
In the event of a conflict of interest, it is reported in a timely manner to the Regulatory Compliance Officer, who is notified of:

- Existing conflict of interest situations,
- Any relationship or significant financial interest that exists with persons or companies with which the Group cooperates and could lead to a conflict of interest,
- Other situations that may cause a conflict of interest, including:
  - any situation where a close relative of an employee, supplier or related third party works for or provides services or has a significant financial interest in a competitor, supplier, customer, or other business with which the Company has significant dealings.
  - all cases where any business or professional activities, agreements or collaborations may lead to conflicts between the interests of employees, suppliers and/or related third parties, and the interests of the Company.

(d) Information and Communication System

The Company's organizational structures ensures the effectiveness of the Company's internal and external communications, e.g. the communication with members of the Board of Directors, shareholders and investors, current Committees of the Company, Supervisory Authorities, etc.
In this context, the Company has established a Shareholders Services and Corporate Announcements Unit, which is mainly responsible for providing prompt, correct and equal information to the Company's shareholders, supporting them about the exercise of their rights in accordance with the Law and the Company's articles of association and ensuring the Company's compliance with the obligations specified

in articles 16 et. seq. of Regulation (EU) 596/2014, Regulation (EU) 2016/347 and relevant national laws, issuing the announcements that regard regulated information in accordance with the provisions of Law 3356/2007 and corporate events, and is also responsible for the Company's communication with the competent authorities, mass media and any other competent body.

Furthermore, the Company, in the context of proper corporate governance and regulatory compliance, has adopted the Report & Complaints Management Policy and has appointed the Regulatory Compliance Manager as the Report Receipt and Monitoring Officer.

(e) Monitoring of the adequacy of the Internal Control System

The Management has designed and performs continuously monitoring activities, which are incorporated in the Company's operation and ensure that the Internal Control System always maintains its efficiency.

The Company also periodically conducts separate assessments of the Internal Control System's adequacy, which are conducted mainly by the Internal Control Unit and the Audit Committee.

Internal Control Unit

The Company has established an Internal Control Unit in accordance with Article 16 of Law 4706/2020, which constitutes and independent organizational unit within the Company, to monitor and improve the Company's functions and policies that concern its Internal Control System.

Specifically, the Internal Control Unit monitors, audits and evaluates: a) the implementation of the internal regulation and the Internal Control Unit, especially with regard to the adequacy and correctness of the provided financial and non-financial reporting, risk management, regulatory compliance and the corporate governance code adopted by the Company, b) the quality assurance mechanisms, c) the corporate governance mechanisms, and d) the fulfillment of commitments announced in the Company's prospectuses and business plans with regard to the use of funds raised from a regulated market. Furthermore, the Internal Control Unit prepares reports for the controlled units with findings regarding the foregoing, the risks arising therefrom and suggestions for improvement, if any. The Internal Control Unit's reports, following the incorporation of relevant opinions of the controlled units, the agreed actions, if any, the acceptance of the risk of not taking any action by the latter, the restrictions in the scope of control, if any, the final internal control suggestions and the results of the response of the Company's controlled units to the suggestions, are submitted, every quarter, to the Audit Committee.

The Internal Control Unit informs the Audit Committee in writing, at least once every quarter, about the results of its activities regarding the detection and management of the most significant risks and the efficiency of the Internal Control Unit, which in turn submits a relevant report to the Company's Board of Directors.

The Head of the Internal Control Unit is appointed by the Company's Board of Directors, is a full time employee assigned this duty exclusively, hierarchically reports directly to the Managing Director and is supervised by the Audit Committee. During the performance of their duties, the Head of the Internal Control Unit is entitled to take cognizance of any book, record or document of the Company and to have full and unimpeded access to any Division/Unit of the Company and any Subsidiaries thereof, as appropriate. The members of the Board of Directors and the Company's employees are obligated to collaborate and provide information to the Head of the Internal Control Unit and in general to facilitate their work in any manner whatsoever.

The Head of the Internal Control Unit attends the general meetings of shareholders, provides any information required by the Capital Market Commission in writing, collaborates with it and facilitates in every possible way its monitoring, control, and supervision work.

Regulatory Compliance Function

The Company has established a Regulatory Compliance Function, which operates independently from all the other organizational units of the Company and reports to the Company's Board of Directors. The main mission of the Regulatory Compliance Unit includes the following:

- Remains up to date with the legal and regulatory developments regarding the Company's regulatory compliance matters.
- Ensures, with appropriate processes, that the deadlines for the fulfillment of the obligations specified in the applicable regulatory framework are met and to this end it provides relevant written assurance to the Board of Directors through regular reports.
- Designs and supervises the regulatory compliance program, reviews it periodically and at least once a year, depending on the needs.
- Audits the keeping of the required books and records (in print form and electronically) per Department, based on its operational functions.
- Updates the Company's employees on the amendments to the applicable regulatory framework and the adoption of a more efficient performance of their duties, by establishing appropriate processes, newsletters, and training programs.
- Collaborates closely with the other Departments of the Company (e.g. Risk Management, Internal Control, Commercial) and the relevant committees, in order to resolve any problems related to the compliance with applicable regulations.
- Requests the aid of the Company's legal advisors for the establishment of the guidelines that the Company will follow in order to comply more efficiently with applicable provisions.
- Detects the points that pose risks for the Company arising from its non-compliance with regulations and suggests corrective actions in order to resolve problematic situations.
- Provides advice to the B.o.D. on a regular basis (at least once a year) but also on extraordinary basis, in order to inform its members about the implementation and progress of the compliance actions, reporting in particular if appropriate corrective measures were taken in the cases where insufficiencies were detected.
- Prepares and submits to the Authorities reports on Regulatory Compliance matters, as, if and when required.
- Acts as the primary point of contact between Regulatory Authorities and the Company, with regard to Regulatory Compliance Function matters.
- Promotes an overall Regulatory Compliance culture to the Company's employees and senior managers.

Audit Committee

The adequacy of the Internal Control System is monitored systematically by the Audit Committee, established in accordance with article 44 of Law 4449/2017, through two-way communication with the Internal Control Unit, and the Company's Management. Specifically:

i. The Head of the Internal Control Unit meets at least once every quarter with the Audit Committee to discuss matters of their competence and any problems that may arise from internal controls and submits to the Audit Committee reports that include the main issues and suggestions regarding the findings and evaluations, they conduct in accordance with article 16 par. 1(a) and (b) of Law 4706/2020.

ii. The Audit Committee presents and submits to the Board of Directors the reports of the Head of the Internal Control Unit with its own remarks and annual report, which concerns, inter alia, the adequacy of the Internal Control System.

iii. The Management has designed and conducts continuous supervisory activities which ensure that the Internal Control System always remains effective. In this context, the Company periodically conducts separate evaluations of the adequacy of the Internal Control System, conducted mainly by the Internal Control Department. Furthermore, the quality of the control activities is ensured through "external review" by reputable audit companies, at least once every three years.

Audit Committee Bylaws: The Company has established Bylaws for the Audit Committee, in accordance with article 10 par. 4 of Law 4706/2020, article 44 of Law 4449/2017 and the letter of the Capital Market Commission with prot. no. 1302/28.04.2017, which cover the Audit Committee's composition, role, duties and operation and evaluation processes, as defined in said letter and the Code.

C.9.3.2 External review of the Internal Control System

According to article 14 par. 3(ι) and 14 par. 4 of Law 4706/2020 combined with decision no. 1/891/30.09.2020 of the Board of Directors of the Capital Market Commission (Greece) as amended by decision no. 2/917/17.06.2021 of the Board of Directors of the Capital Market Commission, the Company conducts a periodic review of the ICS, especially with regard to the adequacy and efficiency of financial reporting, risk management and regulatory compliance and the implementation of the provisions on corporate governance of Law 4706/2020. Said review is conducted periodically, at least once every three (3) years by an independent auditor (not included in the corporate organization of the Company), with the date of the last review as reference date.

The Company's Internal Regulation, to comply with the framework, establishes relevant policies and procedures for the review if the ICS and the selection of the reviewers of the ICS. Specifically, the procedure for the selection of reviewers is supervised by the Company's Audit Committee and the reviewer is selected by the Board of Directors, following proposal of the Audit Committee.

During the selection process of the Internal Control System reviewer, it is ensured that the reviewer and the members of the review team are independent, in accordance with the provisions of articles 9 par. 1 and 2 of Law 4706/2020 and therefore the following persons are excluded and cannot be selected as reviewers: (a) the statutory auditor (natural person) either as a person or personal company and relatives up to the second degree by blood or marriage, or their spouse, if they have conducted a statutory audit of the Company or affiliated company during the previous three (3) fiscal years before their appointment and (b) persons closely associated with the statutory auditor and the aforementioned persons, as defined in point 26 of par. 1 of article 3 of Regulation (EU) 596/2014 of the European Parliament and of the Council, pursuant to article 2(14) of Law 4706/2020. When the review is conducted by a natural person in the context of an employment or collaboration agreement with a legal entity, the dependence association regards the natural person themselves and not necessarily the legal entity with which they have an employment or collaboration agreement. Furthermore, the reviewers must have documented relevant professional experience, i.e. they usually have to be Certified Public Accountants.

The first review of the ICS pursuant to article 14 par. 3(i) and 14 par. 4 of Law 4706/2020, combined with decision no. 1/891/30.09.2020 of the Board of Directors of the Capital Market Commission (Greece) as amended by decision no. 2/917/17.06.2021 of the Board of Directors of the Capital Market Commission, was conducted within the deadline (no later than March 31, 2023) specified in decision no. /917/17.06.2021 of the Board of Directors of the Capital Market Commission, with reference date December 31, 2022 and report period 17/07/2021 – 31/12/2022.

In order to conduct said first ICS review of Company and its significant subsidiaries SIDMA Bulgaria and SIDMA Romania, the Company's Board of Directors, with its decision dated 10/10/2022 and following relevant proposal of the Audit Committee, determined the scope of the ICS review and decided to assign the ICS review to the Audit Firm "Grant Thornton, Certified Public Accountants Business Consultants S.A." (SOEL Reg. No. 127). Following the relevant decision of the Board of Directors, the Company assigned to Mrs. Athina Moustaki, Certified Public Accountant – Independent Reviewer of the Internal Control System (SOEL Reg. No. 28871) of the Audit Firm "Grant Thornton, Certified Public Accountants Business Consultants S.A.". The scope of the review covers the performance of the relevant assurance procedures specified in the Assurance Engagements Program issued on 29/11/2022 by the Accounting Standardization and Audit Committee (no. 040/2022) that analyze the five (5) pillars of the guidelines of Decision 1/891/30.09.2020 of the Board of Directors of the Capital Market Commission as amended by decision no. 2/917/17.06.2021 of the Board of Directors of the Capital Market Commission.

Said review of the Internal Control System covered the following topics: Control Environment, Risk Management, Control and Failsafe Mechanisms, Information and Communication System and Monitoring of the Company's Internal Control System.

Following the completion of the ICS review, that was conducted from October 2022 until March 2023, the Reviewer Mrs. Athina Moustaki on 24/03/2023 submitted to the Company's Board of Directors and Audit Committee an "Assessment Report of the Adequacy and Efficiency of the Internal Control System" in accordance with par. 3(i) and par. 4 of article 14 of Law 4706/2020 and decision 1/891/30.09.2020 of the Board of Directors of the Capital Market Commission ("Assessment Report").

The Conclusion of the Independent Reviewer Mrs. Athina Moustaki, included in the final Assessment Report of the Adequacy and Efficiency of the ICS dated 24/03/2023 is that following the works conducted and the evidence collected with regard to the assessment of the adequacy and efficiency of the ICS of the Company and its significant subsidiaries SIDMA Bulgaria and SIDMA Romania, was that no failures, that could be considered material failures of the ICS of the Company and its significant subsidiaries SIDMA Bulgaria and SIDMA Romania pursuant to the Regulatory Framework, were detected.

The Company's Audit Committee, during its meeting of 27/03/2023 reviewed the Assessment Report and found that currently no immediate corrective action is required. Thereafter, the Audit Committee decided to notify the results of the aforementioned review to the Board of Directors, accompanied by relevant proposal to submit a summary of the review to the Capital Market Commission, or the entire Assessment Report, if required. Following the meeting of the Board of Directors of 27/03/2023, which approved the aforementioned proposal of the Audit Committee, it was found that currently no immediate corrective action is required, and it was decided to proceed to the aforementioned submission to the Capital Market Commission. The summary of the assessment report was submitted to the Capital Market Commission on 29/03/2023.

C.9.4. Board of Directors

(a) Composition of the Board of Directors
The current Board of Directors of the Company consists of ten (10) members and was appointed by the Ordinary General Meeting of 02.06.2022. Specifically, the Company's Board of Directors consists of three (3) executive and seven (7) non-executive members, of which three (3) are independent non-executive members that meet the independence criteria of Law 4706/2020 and the criteria specified in the Internal Regulation, the Company's Suitability and Reliability Policy for the Members of the Board of Directors, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code adopted by the Company.

The capacity of the members of the Board of Directors as executive or non-executive was determined in the meeting of the Company's Board of Directors on 02.06.2022 when the Board of Directors was established as a body, whereas the independent members were appointed by the Company's General Meeting on 02.06.2022.

The executive members are responsible for the representation of the Company and manage the daily administration affairs of the Company and are responsible for continuously monitoring the Company's activities. Specifically, the executive members of the Company:

- actively participate in the Company's business affairs, taking decisions with a view to the corporate interests and after receiving sufficient information, for the specific circumstances,
- are responsible for implementing the decisions of the Board of Directors,
- are responsible for the implementation of the strategies determined by the Board of Directors and regularly discuss the implementation and adequacy of said strategies with the non-executive members of the Board of Directors, and,
- inform the Board of Directors in writing, at any time when they deem it necessary and without undue delay when required for the assessment of a situation, about the risks and developments that affect or could potentially affect the Company significantly, e.g. about important decisions that regard business activities and the risks assumed, about the Company's liquidity and capital base, as well as about the assessment of significant risks that were or will be assumed.

The non-executive members are tasked with duties arising from the need to ensure appropriate corporate governance. Specifically:

- they monitor and critically and constructively review the Company's strategy and the implementation thereof, as well as the achievement of the Company's objectives,
- they ensure the efficient supervision of the executive members, including the monitoring and evaluation of their performance,
- • they critically and constructively examine the proposals and the information provided by the executive members, and,
- they exercise with due diligence and responsibly any duties assigned by the Board of Directors, e.g. the duties related to their participation in committees of the Board of Directors. Without prejudice to the competences of the Audit Committee, they monitor the efficiency of the Company's Internal Control System, quality assurance and risk management system, they express their concerns about any failures they detect and inform the Board of Directors accordingly.

The independent non-executive members of the Board of Directors meet all the independence criteria that must be met by every independent non-executive member of a Board of Directors according to article 9 of Law 4706/2020 and the provisions of the Internal Regulation, the Company's Suitability and

Reliability Policy for the Members of the Board of Directors, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code adopted by the Company, since they do not hold shares of the Company exceeding 0.5% of its share capital and are free of financial, business, family or other dependence relations, including but not limited to those listed in article 9 of Law 4706/2020, that could influence their decisions and their independent and objective judgment. Specifically, the members of the Board of Directors may not:

- hold more than 0.5% of the Company's share capital,
- receive any significant remuneration or benefit from the Company or affiliated companies or participate in a share option scheme for the purchase of shares or in any other performance-related pay or benefit system, other than the remuneration for their participation in the Board of Directors or committees thereof, and the collection of fixed benefits in the context of a pension scheme, including deferred benefits, for prior services to the Company. The criteria that define the concept of significant remuneration or benefit are determined in the Company's remuneration policy,
- either themselves or persons closely associated with them, currently or during the previous three (3) fiscal years prior to their appointment, have a business relation with the Company or a person affiliated with the Company or shareholder that either directly or indirectly held a share equal to or greater than ten percent (10%) of the Company's share capital during the previous three (3) fiscal years prior to their appointment, or with an affiliated company, if said relation affects or could potentially affect the business activity of the Company or of the person of par. 1 or the closely associated person. Such a relation exists especially when the person is a significant supplier or significant client of the Company,
- either themselves or persons closely associated with them, have served as members of the Company's or an affiliate's Board of Directors for more than nine (9) fiscal years cumulatively, as of the date of their appointment,
- either themselves or persons closely associated with them, have served as managers or have had an employment or project or services or retainer agreement with the Company or any affiliated company, during the previous three (3) fiscal years prior to their appointment,
- either themselves or persons closely associated with them, be relatives up to the second degree by blood or marriage, or spouses or partners equivalent to spouses, of a member of the Board of Directors or senior manager or shareholder holding a share equal to or greater than ten percent (10%) of the Company's or an affiliate's share capital,
- either themselves or persons closely associated with them, be appointed by a specific shareholder of the Company, according to the articles of association,
- either themselves or persons closely associated with them, represent shareholders that directly or indirectly hold a percentage equal to or greater than five percent (5%) of the voting rights in the Company's general meeting during their term of office, without written instructions,
- either themselves or persons closely associated with them, have been involved in the performance of a statutory audit of the Company or any affiliated company, either personally or through a firm or relatives up to the second degree by blood or marriage, or spouses, during the previous three (3) fiscal years prior to their appointment,
- either themselves or persons closely associated with them, be executive members in another company in the Board of Directors of which participates an executive member of the Company as a non-executive member.

Specifically, the Company's Board of Directors, during is meeting of 04.04.2023 in the context of the annual review of the fulfillment of the independence criteria of independent non-executive members pursuant to article 9 par. 3 of Law 706/2020, reviewed the documentation collected by the Remuneration and Nomination Committee, which took the following actions:

(i) Received a solemn statement from each independent non-executive member regarding the fulfillment of the independence criteria pursuant to article 9 par. 3 of Law 706/2020 and the provisions of the Internal Regulation, the Company's Suitability and Reliability Policy for the Members of the Board of Directors, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code adopted by the Company.

(ii) Investigated and audit of the Company's shareholders register and determined that the aforementioned non-executive members of the Board of Directors do not hold shares of the Company and none of the conditions of article 9 par. 2(a) of Law 4706/2020, as in force, apply.

(iii) Investigated and audit of the Company's accounting records and agreements, whereby it was determined that the aforementioned independent non-executive members of the Board of Directors are not significant suppliers or clients of the Company and none of the conditions of article 9 par. 2(b) of Law 4706/2020, as in force, apply.

(iv) Conducted (a) an investigation and audit of the Company's Articles of Association, the Minutes of the Board of Directors and General meetings of the Company and its subsidiaries for the past ten years, (b) an investigation and audit of the Company's Financial Department, Accounting Department and Human Resources Department that keep records on persons that provided services pursuant to a salaried employment, project, independent services or any other agreement, during the previous three years, and of the financial statements of the Company and its subsidiaries, for the previous three years, with regard to persons that conducted statutory audits of the Company and its subsidiaries and (c) personal interviews with persons, managers, employees and shareholders of the Company with long-term knowledge of the Company's corporate affairs and in view of the foregoing (a) to (c) it determined that none of the conditions of points γα), γβ, γγ), γδ), γδ),γε), γστ), and γζ) of par. 2 of article 9 of Law 4706/2020, as in force, apply.

In view of the foregoing, the Board of Directors during its aforementioned meeting confirmed that the independent non-executive members of the Board of Directors continue to meet the independence criteria of Law 4706/2020, i.e. they do not hold shares of the Company exceeding 0.5% of the share capital thereof and are free of financial, business, family or other dependence relations, including but not limited to those listed in article 9 of Law 4706/2020 (as specified in circular no. 60 of the Capital Market Commission and the suitability criteria specified in the Internal Regulation, the Company's Suitability and Reliability Policy for the Members of the Board of Directors and the Hellenic Corporate Governance Code), that could influence their decisions and their independent and objective judgment.

The independent non-executive members of the Board of Directors, in the context of the exercise of their duties, mandatorily submit to the ordinary or extraordinary General Meeting, either individually or jointly, reports and reviews separate from those of the Board of Directors. The contents of the aforementioned reports must include, at minimum, a reference to their obligations as non-executive members, as described in article 7 of Law 4706/2020, including the following: (a) they monitor and review the Company's strategy and the implementation thereof, as well as the achievement of the Company's objectives, (b) they ensure the efficient supervision of the executive members, including the monitoring and evaluation of their performance and (c) they examine and express their opinion on the proposals submitted by the executive members, based on existing information. During 2022, the independent non-executive members of the Board of Directors held a meeting on 05.05.2022 and jointly submitted a report to the General Meeting, as documented in the minutes thereof dated 02.06.2022. The report of the independent non-executive members of the Board of Directors is available at the Company's website.

Each member of the Board of Directors meets the individual suitability criteria specified by Law 4706/2020, the Company's Suitability and Reliability Policy for the Members of the Board of Directors, the

Company's Internal Regulation, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code. The composition of the Board of Directors meets the collective suitability criteria specified by the Company's Suitability and Reliability Policy for the Members of the Board of Directors, the Company's Internal Regulation, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code and is in line with the Company's business model and strategy. Specifically, the members of the Board of Directors have extensive knowledge of the industry in which the Company operates and the Board of Directors includes members that hold or have held leadership positions in the metallurgical industry, have experience in administration, accounting and control, risk and capital management subjects, as well as an understanding of the legal and regulatory requirements of the industry, significant experience in the business and professional world and society in general and fully understand the structure and potential of the Company's clientele and the main markets in which the Company operates today, whereas they also have significant international experience and are able to contribute to the Company's growth prospects.

In particular, the brief CVs of the members of the Board of Directors are presented below:

Panagiotis Bitros - Chair of the Board of Directors (Non-Executive Member): He has been managing the family business of trading in steel products since 1960, which developed into the Group of businesses of MPITROS HOLDINGS SA. He has been a member of the Board of Directors of PIRAEUS Bank and ETBA. In parallel with his business activity, he developed a remarkable activity in the field of employers' trade unionism, being for several years a Member of the Board of Directors of S.E.B. and President of the Piraeus Chamber of Commerce and the Union of Hellenic Chambers of Commerce. Today he holds the positions of Chairman of the Board of MPITROS HOLDINGS and Chairman of the Association of Importers / Exporters of Steel Products. He has been non-executive Chair of the Board of Directors of the Company since December 2020.

Victor Pisante - Vice Chair (Non-Executive Member): Mr. Pisante holds a degree in Economics and International Relations from Brown University and a postgraduate degree in Business Administration in Finance from the School of Business Administration of the New York University. Mr. Pisante, co-founder of Bluehouse in 2004, is responsible for Bluehouse's investment strategy, financing and operations. Prior to founding Bluehouse, Mr. Pisante was the co-founder and co-chief executive officer of Telesis group of companies, an independent investment banking group in Greece. Prior to the founding of Telesis, Mr. Pisante worked in the M&A and corporate finance department of Bear Stearns in New York. He has been a non-executive member of the Board of Directors of the Company since December 2020.

Antonis Karadeloglou - Chief Executive Officer and Member of the Board of Directors (Executive Member): Chemist, graduate of the University of Patras. Prior to joining SIDMA SA, he worked in positions of responsibility in various companies of the VIOCHALCO Group. He has been working for the Company since 2010, assuming the position of Commercial Director of the Group. In January 2013 he took over the position of General Manager and from May 2020 he holds the position of Chief Executive Officer of SIDMA SA. He is an executive member of the Board of Directors of the Company since May 2017.

Nikolaos Mariou - Member of the Board of Directors (Executive Member): Chemist, graduate of the University of Athens and holds a master's degree in Biochemical Engineering from University College London and in Business Administration (MBA) from Imperial College London. Prior to joining SIDENOR SA, he was Area Sales Manager at BIORYL SA, Category Marketing Manager at COLGATE PALMOLIVE HELLAS, Marketing & Export Manager at P.D. PAPOUTSANIS SA and Deputy General Manager at APIVITA SA. Mr. Mariou was the Commercial Director of SIDENOR SA from 2004 to 2007 and currently holds the position of General Manager. He has been a member of the Board of Directors of the Company since June 2009.

Stavros Gatopoulos - Member of the Board of Directors (Non-Executive Member): Studied at the Law School of the University of Athens. He was an Advisor to the Mayor of Agia Paraskevi and of the General Secretary of new Generation as well as Director of the Union of Hellenic Commercial Chambers. Since 1992 he holds senior management positions in the companies of the MPITROS HOLDINGS Group. He has a Member of the Board of Directors of the Company since December 2020.

Michael Samonas - Board Member (Executive Member): Graduate of Applied Accounting from the University of Oxford Brooks and of Physics from the Aristotle University of Thessaloniki and holds a Master of Business Administration (MBA) from the University of La Verne and a Ph.D. from the Department of Electrical and Electronics Engineering at the University of Surrey (United Kingdom). He is certified by the professional association of chartered accountants of England (ACCA). He has been working for the Company since 2004. He has been working for the Company since 2004, holding the position of Group CFO. He is an executive member of the Board of Directors of the Company since May 2020.

Panagiotis Konstantinou - Member of the Board of Directors (Non-Executive Member): Graduate Mechanical Engineer of NTUA and holder of postgraduate degrees (MSc) in Automation Systems (NTUA) and in Applied Economics from the University of Economics of Athens as well as studies in Industrial Marketing at INSEAD in France. He belongs to the executive staff of SIDENOR SA since 2014 and today holds the position of Commercial Manager.

Efstathia Salaka - Member of the Board of Directors (Independent Non-Executive Member): Graduate of the Law School of the University of Athens and holder of a Master Degree, LL.M., from the University of Southampton, Great Britain. Since 1993 he has been an executive of the Legal Department of PPC SA and since 2005 head of the Tenders and Contracts Department as well as a special executive (expert) on issues of industrial customers. She has handled numerous cases before the Greek administrative authorities and courts, before arbitral tribunals (ICC, RAE, Civil Procedure Code), the European Commission and the European Court of Justice, in the fields of commercial law, European competition law, energy law and financial law. In the context of her involvement, she has provided consulting services to the Management and the senior executives of PPC SA on issues of strategic importance. She is an Independent Non-Executive Member of the Board of Directors of the Company since June 2021.

Vassilia Manoli - Member of the Board of Directors (Independent Non - Executive Member): Graduate (B.Sc) in Accounting and Finance from the American College of Greece and holder of a Master Degree in Business Administration (MBA) in Financial Services from Alba Graduate Business School. Has 27 years of prior experience in the private sector in positions of responsibility. She was a Financial Advisor - in the Strategy / Business Development Department of ING Hellas from 1998 until 2005. From 2005 until today he belongs to the executive staff of Eurobank SA. She is an Independent Non-Executive Member of the Board of Directors of the Company since June 2021.

Sotirios Vardaramatos – Member of the Board of Directors (Independent Non-Executive Member): Graduate of the Department of Economics of the Aristotle University of Thessaloniki. He has been practicing the auditing profession since 1984 and particularly, as a member of the Board of Chartered Accountants (SOL) from 1984 to 1992 and of the Board of Chartered Accountants (SOEL) from 1993 until today. Since 1996, with the rank of Certified Public Accountant, he has been active professionally in the Auditing Company "SOL SA", in which he is also a shareholder. During his long career as Certified Public

Accountant, he was appointed, as a statutory auditor, by a significant number of companies, listed and unlisted, to audit their annual financial statements and to issue tax compliance audit reports. He also dealt with special audits for the listing of companies in the Athens Stock Exchange, business appraisals and special management audits. Furthermore, he has in depth knowledge about mergers and acquisitions. He is an independent non-executive member of the Company's Board of Directors since June 2022.

It should be noted Mr. Gerasimos Vardaramatos served as member of the Company's Board of Directors and Chairman of the Audit Committee from June 2021 until 02.06.2022 (date of the Company's ordinary General Meeting of 2022). Mr. Gerasimos Vardaramatos is a Graduate of the Department of Economics of the National and Kapodistrian University of Athens. Holder of the Postgraduate Professional Qualification of Accountants (METKEL) of the Training Institute of the Body of Certified Public Accountants (IESOL). He practiced the profession of certified public accountant from 2012 to 2018 in the company SOL SA. From 2018 to date he works in a multinational consulting company, responsible for the preparation of financial statements according to the International Financial Reporting Standards.

The term of the new Board of Directors of the Company commences from the day following their election, ie from 02.06.2022 until 01.06.2023, which is extended, pursuant to article 85, par. 1, passage c of Law 4548/2018, as in force, until the expiration of the deadline within which the next Ordinary General Meeting of the Company's Shareholders must meet in 2023 and until the relevant decision is made.

The members of the Board of Directors, apart from their activities relating to their capacity and position in the Company, do not carry out any other professional activities that are significant for the Company, with the following exceptions:

MEMBER'S NAME	NAME OF LEGAL PERSON	COUNTRY	MEMBERSHIP
BITROS PANAGIOTIS	BITROS HOLDING S.A.	Greece	Chairman of the BoD
	BITROS METALLOYRGIKI S.A.	Greece	Chairman and Chief
	BITROS KATASKEVASTIKI ANONIMI EI	Greece	Chairman of the BoD
	BITROS KATASKEVASTIKI ANONIMI EI	Greece	Chairman of the BoD
	D.G. VAKONTIOS S.A.	Greece	Vice- Chairman of BoD
	FOREAS VIOMIHANIKOY PARKOY (VIF	Greece	CEO
VICTOR ANDREA PISANTE	Bluehouse Capital Hellas	Greece	Chairman of the BoD & CEO
	Bluehouse Property Management	Greece	Chairman of the BoD
	Castello Bibelli SA	Greece	Member
	KTHMA Mibelli SA	Greece	Member
	Larissa Development of Shopping Ce	Greece	Member
	Athens Hotel S.A.	Greece	Vice- Chairman of BoD
	Amalia Hotel & Tourist S.A.	Greece	Member
	Bluehouse Capital Holdings Limited	Cyprus	Member
	Bluehouse Capital Advisors Limited	Cyprus	Member
	Bluehouse Investments Advisors Lim	Cyprus	Member
	ECM Bluehouse Capital Ltd	Cyprus	Member

	T2 Bluehouse Capital GP Limited	Cyprus	Member
	T2 Bluehouse Capital GP II Limited	Cyprus	Member
	Bluehouse Capital Holdings I Limited	Cyprus	Member
	Bluehouse Accession Property Holdi	Cyprus	Member
	Bluehouse Capital Advisors S.à r.l.	Luxembourg	Member
	Bluehouse Accession Property Holdi	Luxembourg	Member
	Bluehouse Property Fund IV GP, S.à r	Luxembourg	Member
	Bluehouse Property Holdings IV Sarl	Luxembourg	Member
	MGE Hellenic Investment Sarl	Luxembourg	Member
	Bluehouse Asset Management Sp. Zc	Poland	Member
	Fanning Investments Sp zoo	Poland	Member
	Medton Investments Sp zoo	Poland	Member
	Maywood Investments Sp zoo	Poland	Member
	Sandres Investments Sp zoo	Poland	Member
	PDC Industrial Center 148 Sp zoo	Poland	Member
KARADELOGLOU ANTONIOS	SIDMA BULGARIA S.A.	Bulgaria	Member
	SIDMA ROMANIA SRL.	Romania	Member
	SIDMA Worldwide Cyprus	Cyprus	Member
MARIOU NIKOLAOS	SOVEL A.E	Greece	Vice-Chairman of BoD
	SIDMA ROMANIA SRL.	Romania	Member
	ERLIKON S.A.	Greece	Member
	AEIFOROS S.A.	Greece	Member
	PRAKSYS S.A.	Greece	Member
	STOMANA ENGINEERING (ex SIGMA IC. S.A.)	Bulgaria	Member
	DOJRAN STEEL DOOEL	Dojran	Member
	VI.ENER S.A. ENERGY ENTERPRISES	Greece	Member
	JOSTDEX LIMITED	Cyprus	Member
	SIDEROM STEEL SRL	Romania	Member
	SIDEBALK STEEL DOO	Serbia	Member
	SIDENOR STEEL INDUSTRY S.A.	Greece	Member
	PRAKSYS BG S.A., UIC	Bulgaria	Member
	CPW SOLAR S.A.	Greece	Member
	ALMYROS BUSINESS PARK DEVELOPMENT COMPANY SINGLE MEMBER S.A.	Greece	Chairman of BoD
	OINOFYTA BUSINESS PARK DEVELOPMENT S.A.	Greece	Vice-Chairman of BoD
GATOPOULOS STAVROS	BIG SOLAR S.A	Greece	Vice-Chairman of BoD and CEO
	BITROS METALLOYRGIKI S.A.	Greece	Executive Member of BoD
	BITROS OPLISMOS SKYRODEMATOS ANONYMI VIOMIHANIKI EMPORIKI KAI TEHNIKI ETAIRIA	Greece	CEO
	D.G. VAKONTIOS S.A.	Greece	Executive Member of BoD
	T.H. ENERGEIAKI ANONIMI ETAIRIA	Greece	CEO
	VIOAERIO PELLAS ANONIMI ETAIRIA	Greece	Vice-Chairman of BoD
SAMONAS MICHALIS	SIDMA BULGARIA S.A.	Bulgaria	Member
	SIDMA ROMANIA SRL.	Romania	Member
	SIDMA Worldwide Cyprus	Cyprus	Member
	HARIMA - Hellenic Association of Risk Managers	Greece	Member

The Board of Directors is not supported by a company secretary.

The CVs of Senior executives who are not members of the Board of Directors are shown below:

Elias Naar
Procurement Manager
Graduate of the Department of Physics of the University of Athens and holder of Master postgraduate degrees and Ph.D. in Theoretical Nuclear Physics from the University of Manchester (United Kingdom). He has been working for the Company since 1995.

Dimitrios Karabetsos
Commercial Manager
Certified Chemical Engineer from AUTH and holder of a master's degree in business administration (from E.E.D.E). He has previous service in ERLIKON SA of the SIDENOR Group from 2001. He has been working for the company since 2007.

Paris Papageorgiou
Chief Accountant
Graduate of the Higher Industrial School of Piraeus. He has been working for the Company since 1993.

Christos Maglaras
Thessaloniki Branch Manager
Graduated Mechanical Engineer of the National Technical University of Athens. He has served as the production manager and sales manager of steel products companies and the director of production groups of companies with international presence. Has more than 30 years of professional experience. He has been working for the company since 2016.

Alexis Kapitsalas
Director of Informatics
Graduate (BA) in Economics from the University of Stirling and holder of a Masters (M.Sc.) in Computing Science from the University of Newcastle upon Tyne. He has been working for the company since 2003.

Matina Tsili
Human Resources Director / Chief Compliance Officer
For 20 years she has served the Human Resources Manager of the Group of BITROS HOLDINGS SA. and CHIPITA INTERNATIONAL S.A., while she has held executive positions in the field of Human Resources Management and Labor Relations of multinational companies (CARREFOUR, MAKRO). She was a member of the BoD of the Manpower Employment Organisation (OAED) as a representative of the Hellenic Federation of Enterprises (S.E.V.), and participated in committees of the Association, such as the committee of article 15 of Law 1264/82 and the working group for Work issues. She has been working for the Company since September 2020.

Panteleimon Economidis
Technical Director of Steel Sector
Certified Mechanical Engineer with the Technical University of Darmstadt, Germany. He has served as director of production and maintenance in steel companies with an international presence. Also in design, manufacturing, and installation of machines. Has more than 30 years of professional experience. He has been working for the company since 2019.

Vassilis Emmanouilidis
BU Panel Technical Director
Graduate Chemical Engineer of the Technical University of Patras. He has been a factory manager in an artificial silk production company, a factory manager and later a general manager in a polyurethane panel production company with international presence. Has more than 30 years of professional experience. He has been working for the company since 2015.

(b) Responsibilities - Liability
The role, responsibilities and relevant liability of the Board of Directors are described in the articles of association and additionally in the Internal Operation Regulation of the Company.
The Board of Directors represents the Company out of court and before court and is responsible for deciding on any act concerning the management of the Company, the management of its assets and the general pursuit of its purpose, without any restrictions or reservations, for any case which pursuant to the provisions of the law or the Articles of Association does not fall within the competence of the General Meeting.

In particular, the Board of Directors is responsible for the following issues, while the list is only indicative and not restrictive, and does not affect the general principle:

A) Convenes the General Meetings of shareholders on its own initiative or compulsorily, at the request of shareholders or auditors in accordance with the Law, arranges their agenda, keeps the Books of such Minutes, prepares the annual financial statements to be submitted to the General Meeting of the shareholders and in particular the annual financial statements of the Company, prepares all kinds of reports on corporate affairs to the General Meeting and proposes the dividends to be distributed.

B) Determines the regulations of the services, offices and other facilities of the Company, the general management expenses, appoints and terminates the directors and the other staff of the Company of all types, determines the duties and its general remuneration, if they are not members of it, appoints the attorneys of the Company, lawyers or not, determines the type and terms of securities of any nature issued by the Company, and especially the number of shares or bonds incorporated in each security, and determines the manner of placement of available reserves.

C) Decides, on any terms it deems to the interest of the Company, purchases and sales of real estate assets, leases [as lessor or lessee] of movable and immovable property, work and project, establishment of horizontal ownership and horizontal ownership regulations, taking out loans (apart from issue of bond loans), receipt and granting of credits and guarantees to any third parties (State, Banks, Organizations and other natural or legal persons), in favor of natural or legal persons, with which the Company transacts and if this is deemed appropriate for the success of the corporate purpose, always subject to the provisions of article 19 and 99 et seq. of Law 4548/2018, as in force, establishment of encumbrances on real estate assets, as well as pledges on the Company's movable property, exchanges, deposits, deposits of the Company's assets in Banks, or in other natural or legal persons and withdrawals of such deposits, orders, assignments, guarantees, seizures, pledges, supplies, auctions orders, insurances, relocations, charters, issues and receipts and endorsements of bills of exchange and bills, cheques and credit titles and orders, current accounts, deregistration and lifting of mortgages, prenotations of mortgage and seizures, filings, rebuttals and revocations of trials, filings and resignations from ordinary and extraordinary legal remedies, inductions, counterclaims of vows, objections and notifications, denunciations and any judicial and extrajudicial act that lies in the nature and purpose of the Company, and that concerns the administration or management of this property, as well as its participation in existing or affiliate companies of any type.

The Board of Directors may, by its decision, assign, in accordance with article 87 of Law 4548/2018, the exercise of all or some of its rights and powers, related to the administration, management and representation of the Company, except for those requiring collective action, to one or more persons, irrespective of whether they are members of it or not. These persons may, if provided for by the relevant decisions of the Board of Directors, further delegate the exercise of the powers assigned to them or part of those powers to other parties or third parties. The title and responsibility of each of these persons is always determined by the decision of the Board of Directors on their appointment.

The Chair of the Board of Directors chairs the Board of Directors, directs the work of the Board of Directors, chairs the meetings, accepts the requests of the shareholders provided for by law and acts any other action within its competence and the authorization given to it by the Board of Directors. In case of its incapacity or absence, the Chair is replaced by its Deputy or the Chief Executive Officer.

(c) Liability of the members of the Board of Directors

Each member of the Board of Directors is liable towards the Company during the management of the corporate cases for the damage that the Company incurred due to the actions or omissions which constitute breach of corporate duties. It is liable particularly if the balance sheet includes omissions or false statements that conceal the real standing of the Company. No liability applies in case that it proves that it showed the care of the prudent businessman. Such care is judged also based on the capacity of each member and the duties assigned to it. Also, no such liability applies in relation to acts and omissions which are based on legal decisions of the General Meeting, or which relate to a reasonable business decision which has been made in good faith, based on adequate information and for the purpose of serving exclusively the shareholders’ interest.

(d) Meetings of the Board of Directors

The Board of Directors meets at the seat of the Company when the law, the articles of association or the Company’s needs require so and is convened by the Chair or its deputy on a date and time determined by it, by invitation which is notified to its members at least two (2) business days prior to the meeting and five (5) business days if the meeting should take place in a place other than its Seat. The invitation must necessarily and clearly refer to the items of the agenda, otherwise the decision making is permitted only if all the members of the Board of Directors are present or represented and do not object to the decision making. Apart from the Chair of the Board of Directors and its deputy, the meeting may be requested by two (2) of its members by applying to the Chair or its deputy, who are obliged to convene the Board of Directors, for it to meet within a seven (7) days deadline upon submission of the application. The application must also refer clearly to the items that will be addressed by the Board of Directors. If the Board of Directors is not convened by the Chair or its deputy within the above deadline, the members who requested the convening are allowed to convene the Board of Directors within five (5) days from the expiration of the above deadline of seven (7) days, by notifying the relevant invitation to the other members of the Board of Directors.

The Board of Directors may meet by teleconference with respect to some or all its members, in accordance with the provisions of paragraph 4 of article 90 of Law 4548/2018. In this case, the invitation to the members of the Board of Directors includes the necessary information for their participation in the meeting. The technical details and security specifications for the teleconference meetings are approved by a decision of the Board of Directors.

Participation of members of the Board of Directors to its meetings.

In 2022, a total of 34 meetings of the Board of Directors were held. The frequency of participation of the members of the Board of Directors in its meetings during the year 2022 is as follows:

FULL NAME	CAPACITY	PERIOD	NUMBER OF MEETINGS IN WHICH HE/SHE WAS MEMBER OF THE BoD	Member Participation	Participation Percentage in Sessions
BITROS PANAGIOTIS	Chair of BoD/ Non Executive Member	01/01/2022- 31/12/2022	34	34	100%
VICTOR ANDREA PISANTE	Vice Chair of BoD / Non Executive Member	01/01/2022- 31/12/2022	34	34	100%
KARADELOGLOU ANTONIOS	Chief Executive Officer/ Executive Member	01/01/2022- 31/12/2022	34	32	94%
MARIOU NIKOLAOS	Executive Member	01/01/2022- 31/12/2022	34	34	100%
GATOPOULOS STAVROS	Non Executive Member	01/01/2022- 31/12/2022	34	34	100%
SAMONAS MICHAEL	General Manager/ Executive Member	01/01/2022- 31/12/2022	34	32	94%
KONSTANTINOU PANAGIOTIS	Non Executive Member	01/01/2022- 31/12/2022	34	34	100%
BARDAMARATOS GERASIMOS	Independent/ Non Executive Member	01/01/2022 - 01/06/2022	16	11	69%
BARDAMARATOS SOTIRIOS	Independent/ Non Executive Member	02/06/2022- 31/12/2022	18	12	67%
MANOLI VASILEIA	Independent/ Non Executive Member	10/06/2022- 31/12/2022	34	25	74%
SALAKA EUSTATHIA	Independent/ Non Executive Member	10/06/2022- 31/12/2022	34	25	74%

(e) Number of shares in the company held by BoD members and Main Executives

Board of Directors Member / Major Executive	Number of Shares	Participation Percentage
Victor Pisante	700.277	5,16%

(f) Evaluation of Members of the Board of Directors

Evaluation by the Remuneration and Nomination Committee

In accordance with the Suitability and Reliability of the Members of the Board of Directors Policy, the Remuneration and Nomination Committee conducts every year an evaluation (a) of the overall performance of the Board of Directors and its Committees and (b) on an individual basis concerning the assessment of each member's contribution to the successful operation of the Board of Directors which are not nominal but numerical (eg for x number of members it was reported that they were not well prepared for the meetings of the Board of Directors, etc.).

The evaluation is carried out in the first quarter of the year following the term of office, unless there are changes during the year affecting the eligibility or reliability requirements or changes in the status of its own or the members related with it, which may give rise to a conflict of its interest its interests with the interests of the Company.

In particular, the evaluation Report includes a reference to the areas/points it covered, the key strengths identified and the areas that need improvement. Following the discussion of the evaluation, the Board of Directors determines with its decision any further actions that it is deemed appropriate to launch, based on which the relevant action plan is prepared. Also, on an annual basis, their continuing monitoring of the conditions of non-Conflict of Interest is confirmed.

The Remuneration and Nomination Committee, during its meeting on 05.07.2022 conducted its evaluation of the members of the Board of Directors for 2022, including the evaluation of the Chairman and the Managing Director, both at the individual and collective level and concluded that the members of the Board of Directors fulfill the individual and collective suitability criteria of Law 4706/2020 and the provisions of the Internal Regulation, the Company's Suitability and Reliability Policy for the Members of the Board of Directors, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code adopted by the Company. In this context, it examined the renewal needs of the Board of Directors and prepared the Annual Report on the Individual and Collective Suitability of the Members of the Board of Directors and the Committees thereof during its meeting of 05.07.2022. Furthermore, during its meeting of 31.03.2023 it conducted the evaluation of the members of the Board of Directors for 2022, including the evaluation of the Chairman and the Managing Director, and concluded that the composition and operation of the Board of Director is collectively satisfactory, whereas at the individual level the members of the Board of Directors meet the criteria of the Suitability and Reliability Policy for the Members of the Board of Directors and performed their duties effectively.

Self-evaluation of the Board of Directors

Furthermore, the Board of Directors conducts annual a self-evaluation of its performance. For the year 2022, it conducted a self-evaluation in accordance with the provisions of the Hellenic Corporate Governance Code and an evaluation of its committees and concluded that its operation and the operation of its committees is sufficiently effective and does not require improvements.

Evaluation of the executive members of the Board of Directors.

The non-executive members of the Board of Directors, including the independent non-executive members, have, inter alia, the obligation to ensure an effective supervision of the executive members, including the monitoring and evaluation of their performance. The non-executive members of the Board of Directors, fulfilling said obligation, during their meeting of 31.03.2023 determined, based on the information received on the course of corporate affairs, that the executive members of the Company's Board of Directors implement, faithfully and efficiently, the strategy determined by the Board of Directors and exercise their duties effectively.

C.9.5. Audit Committee

(a) Composition and term of Audit Committee

The Company, in compliance with the provisions and the requirements of Law 4449/2017 and article 10 Law 4706/2020 has set up an Audit Committee to support the Board of Directors with its duties relating to financial reporting, internal audit and the supervision of the statutory audit.

Since 01.01.2022 and till the Extraordinary General Meeting of the Company's Shareholders of 2nd June 2022, the composition of the Committee was as follows:

1. Gerasimos Vardaramatos, President of the Audit Committee – Independent non-executive member of the Board of Directors

2. Panayotis Konstantinou, Member of the Audit Committee – Non-executive member of the Board of Directors

3. Vasileia Manoli, Member of the Audit Committee – Independent non-executive member of the Board of Directors

The aforementioned persons have been appointed as members of the Audit Committee by the Company's Board of Directors during the meeting of 10.06.2021, following the reclassification of the Audit Committee as a Committee of the Board of Directors by the Company's General Meeting on 10/06/2021, with a term of office equal to that of the Board of Directors, i.e. one year, extendable, in accordance with article 85 par. 1(c') of Law 4548/2018, as in force, until the elapse of the deadline for convening the next Ordinary General Meeting of the Company's Shareholders and until the relevant decision is taken. During the period from 01.01.2022 and until the Company's General Meeting of 02.06.2022, Mr. Gerasimos Vardaramatos, Independent Non-Executive Member of the Board of Directors, served as Chairman of the Audit Committee, appointed by the members of the Audit Committee during its meeting of 10.06.2021 as Chairman of the Committee as a person with accounting or audit knowledge, pursuant to the requirements of article 44 of Law 4449/2017.
Following the elapse of the term of the Company's Audit Committee, the Company's General Meeting of 02.06.2022, in accordance with the provisions of article 44 of Law 4449/2017, as in force, reclassified the Audit Committee as a committee of the Board of Directors consisting of three (3) non-executive members of the Board of Directors, two (2) of which are independent, in accordance with the provisions of article 9 of LAW 4706/2020 and the provisions of the Internal Regulation, the Company's Suitability and Reliability Policy for the Members of the Board of Directors, circular no. 60 of the Capital Market Commission and the Hellenic Corporate Governance Code adopted by the Company. Thereafter, the Company's Board of Directors appointed the persons below as members of the Audit Committee, and the Audit Committee was established as a body on 02/06/2022 and appointed as its Chair Mr. Sotirios Vardaramatos, Independent Non-Executive Member of the Board of Directors:

1. Sotirios Vardaramatos, Chairman, Independent Non-Executive Member of the Board of Directors

2. Panagiotis Konstantinou, Member, Non-Executive Member of the Board of Directors

3. Vasileia Manoli, Member, Independent Non-Executive Member of the Board of Directors

The members of the Audit Committee meet the criteria of article 44 of Law 4449/2017 and article 9 of Law 4706/2020, as in force. Specifically:

- the members of the Audit Committee collectively have sufficient knowledge of the industry in which the Company operates,
- the majority of the appointed members of the Audit Committee meets the independence criteria of article 9 of Law 4706/2020,
- at least one member, Mr. Sotirios Vardaramatos has the required sufficient knowledge on accounting or auditing pursuant to article 44 of Law 4449/2017 and mandatorily attends the meetings of the Audit Committee regarding the approval of the financial statements.

The Audit Committee reports to the Board of Directors.

The term of office of the Audit Committee is equal to that of the Board of Directors, i.e. one (1) year, extendable until the elapse of the deadline for convening the next Ordinary General Meeting of the Company's Shareholders in 2023 and until the relevant decision is taken.

The Audit Committee has Bylaws, in accordance with article 10 par. 2 of Law 4706/2020 and article 44 par. 1(h) of LAW 4449/2017, as in force, that specify, inter alia, the competencies of the Audit Committee, the procedure for the appointment of its members pursuant to the provisions of Law 4706/2020 and Law 4449/2017, as in force, as well as the procedure for convening and holding its meetings. The Bylaws of the Audit Committee are available at the Company's website: https://sidma.gr/wp-content/uploads/2021/11/Audit_Committee_Regulation_v3.pdf.

(b) Responsibilities of the Audit Committee

The responsibilities of the Audit Committee include, inter alia:

a. Informing the Board of Directors for the outcome of the statutory audit,
b. Monitoring the financial reporting procedure,
c. Monitoring the effective operation of the internal control system and risk management systems, ensuring quality, as well as supervising the good functioning of the Company's internal audit unit;
d. Monitoring the progress of the statutory audit for the individual and consolidated financial statements,
e. Reviewing and monitoring issues relevant to the existence and maintenance of objectivity and independence of the statutory auditor or audit firm, particularly with regard to the provision of other services to the Company by the statutory auditor or audit firm,
f. the selection procedure of the statutory auditors and proposing to the Board of Directors their appointment.

In order for the Audit Committee to carry out its work, it has unhindered and full access to the information that it needs during the exercise of its duties and it provided with the required resources for the satisfaction of its purposes, including services by external counsels.

(c) Meetings of the Audit Committee

In 2022, 12 meetings of the Audit Committee took place.

Participation of AC members to the meetings of the Committee:

FULL NAME	CAPACITY	PERIOD	NUMBER OF MEETINGS IN WHICH HE/SHE WERE A MEMBER OF COMMITEE	MEMBER PARTICIPATION	PARTICIPATION PERCENTAGE IN MEETINGS
BARDARAMATOS SOTIRIOS	Chair	01/01/2022 -01/06/2022	7	7	100%
MANOLI VASILEIA	Member	01/01/2022 -01/06/2022	7	7	100%
KONSTANTINOU PANAGIOTIS	Member	01/01/2022 -01/06/2022	7	4	57%

FULL NAME	CAPACITY	PERIOD	NUMBER OF MEETINGS IN WHICH HE/SHE WERE A MEMBER OF COMMITEE	MEMBER PARTICIPATION	PARTICIPATION PERCENTAGE IN MEETINGS
BARDARAMATOS SOTIRIOS	Chair	02/06/2022 -31/12/2022	5	5	100%
MANOLI VASILEIA	Member	02/06/2022 -31/12/2022	5	5	100%
KONSTANTINOU PANAGIOTIS	Member	02/06/2022 -31/12/2022	5	3	60%

Report on the activities of the Audit Committee for the financial year 2022

(Reference Period 1.1.2022-1.6.2022)

Aspropyrgos, 14 April 2023

To: The shareholders of the Regular General Meeting of SIDMA STEEL S.A.
Dear Shareholders,

In our capacity as Members of the Audit Committee of the Company under the title "**SIDMA STEEL S.A.**" (hereinafter referred to as the "Company"), for the reference period from 1.1.2022 to 1.6.2022, and in accordance with the provisions of Article 44 of Law 4449 /2017 (hereinafter referred to as the "Law") on the one hand, and the analytical information included in the Disclosures No. 1302/28-4-2017 and 1508/17.7.2020 of the Department of Listed Companies of the Hellenic Capital Market Commission (hereinafter referred to as the "Disclosures") on the other hand, we are presenting below our present Report and disclosing to you, within the scope of the Audit Committee's responsibilities, the findings regarding the subjects regulated by the Law and the aforementioned Disclosures regarding the 2022 fiscal year.

OBJECTIVE OF THE COMMITTEE AND MAIN RESPONSIBILITIES

The objective of the Audit Committee is to support the Board of Directors in fulfilling its responsibilities for supervising the audit procedures to monitor compliance with the legal and regulatory framework relating to:

a) financial reporting,
b) the Internal Control System; and
c) supervising the (external) statutory audit of the Company's separate and consolidated financial statements.

More specifically, the Audit Committee's responsibilities include monitoring:

- **the procedure of the statutory audit** of the company's financial statements and informing the Board of Directors on its contribution to accuracy, correctness, and completeness of the financial information. The AC took into consideration the **supplementary report** submitted by the Statutory Auditor, which shall include the results of the external audit and anything else worth reporting to the BoD.

- **the procedure of preparation of financial reporting** by the company's organizational units and sound disclosure of this information to the investors (announcements to the stock exchange, press releases).

- **adequacy and effectiveness** of all the company's **policies, procedures and controls**, **sound operating, independence and non-restricted activities of the internal audit unit.**

- **independence of the statutory auditors** (period of cooperation, any incompatible non-audit services, level of remuneration). The Statutory Auditor shall annually submit **an independence statement** and discusses with the members of the AC any threat to his/her independence and assurance.

- **Statutory Auditors selection procedure,** which shall be based on a relevant market research with at least two alternative proposals and conducted in a fully justified manner regarding the final selection of the statutory auditor.

COMPOSITION – RULES OF PROCEDURE

The Audit Committee is a committee of the Board of Directors, consisting of three (3) non-executive members of the Board of Directors. Many of the members of the Audit Committee are independent non-executive members of the Board of Directors in accordance with the provisions of Law 4449/2017 and were appointed by the respective Board of Directors of the Company.

The composition of the Audit Committee during the period 1.1.2022-1.6.2022 was as follows:

- Gerasimos Vardaramatos, Chairman of the Audit Committee, Independent non-executive member of the Board of Directors.
- Vassilia Manoli, Independent non-executive member of the Board of Directors.
- Panagiotis Konstantinou, Non-executive member of the Board.

The members of the Audit Committee fully meet the criteria and independence requirements set out in paragraph 1 of the present Article. All members of the Audit Committee, in accordance with the provisions of paragraph g. 1 of Article 44 of Law 4449/2017, have proven sufficient knowledge of the Company's operating segment and one member has sufficient knowledge in accounting and auditing matters.

MEETINGS

The Audit Committee convenes at the Company's headquarters or via teleconference, in accordance with Article 90 of Law 4548/2018, as effective. The Audit Committee shall convene as often as necessary to effectively perform its duties.

The Committee convened 7 times during the period 01.01.2022 - 01.06.2022. Of these meetings, two (2) took place with the Certified Public Accountant and the audit team during the planning stage of the audit and during the preparation stage of the Audit Reports for the fiscal year2021. The meetings of the Committee were attended by the Company's Internal Auditor, and depending on the agenda of the meeting, the Statutory Auditor and the external audit team, the Chief Executive Officer, the Chief Financial Officer, and senior management of the Company.

ACTIVITIES OF THE COMMITTEE

The responsibilities of the Committee are defined in **paragraph 3 of Article 44 of Law 4449/2017**. In addition, the Audit Committee has its own separate and updated Rules of Procedure, posted on the Company's website: www.sidma.gr/Investor Relations/Corporate Governance/Audit Committee. The actions of the Committee in contrast to the responsibilities set out in the above provisions are analytically described below.

RESPONSIBILITIES	ACTIONS
External audit	
This Audit Committee did not take any action regarding the financial statements of the FY 2022 as it was not within its competence since its term of office ended on 1.6.2022.	
Financial reporting procedure	
In accordance with the provisions of Article 44 of Law 4449/2017 and specifically paragraph 3 (b), the Committee dealt with:	
- The Committee monitored, evaluated and examined the process of drafting the financial information, i.e. the mechanisms and systems for the production, flow and dissemination of the financial information as well as the other publicized information in any way (e.g. stock announcements, press releases).	As mentioned above, this Committee did not take any action regarding the financial statements for the year 2022. About the other published information, no weakness was found in their preparation.
Internal control and risk management system procedures and internal audit unit	
In accordance with the provisions of Article 44 of Law 4449/2017 and specifically paragraph 3 (c), the Committee was responsible for:	
- Monitoring, reviewing, and evaluating adequacy and effectiveness of the	The Commission has taken the following actions:

company's policies, procedures and controls regarding the internal control system and the assessment and management of risks related to financial reporting.

1) The Audit Committee in March 2022 carried out an evaluation, selection, and recommendation to the Board of Directors for the appointment of a new head of the Company's Internal Audit Unit. The new head of the Company's Internal Audit Unit, in accordance with article 15 of Law 4706/2020, is a full-time and exclusive employee of the Company, personally and functionally independent and objective in the exercise of her duties. She has the appropriate knowledge and relevant professional experience. She is not a member of the Board of Directors or a member with the right to vote in committees of a permanent nature of the Company and does not have close ties with anyone who holds one of the above qualities in the Company.
2) Evaluated the sound operation of the Internal Audit Unit in accordance with professional standards and the applicable legal and regulatory framework and assessing the operations performed by the Internal Audit Unit, its adequacy and effectiveness, without affecting its independence.
3) Evaluated the staffing and organizational structure of the Internal Audit Unit and its potential weaknesses, i.e. whether it lacks the necessary resources, whether it is inadequately staffed with personnel with insufficient knowledge, experience and training.
4) Evaluated the existence or non-existence of constraints on the operations of the Internal Audit Unit, as well as the independence it should have to carry out its operations without obstacles.
5) Reviewed any disclosed information with respect to internal control system and the Company's principal risks and uncertainties with respect to financial reporting.
6) Evaluated the Internal Audit Unit's annual audit plan prior to its implementation, considering the main areas of business financial risk and the results of previous audits. Ensuring that the annual audit plan covers the most significant areas of control and systems related to financial

reporting.

7) Conducted regular meetings with the Head of the Internal Audit Unit on matters within his/her remit and obtaining knowledge of its work and its regular and extraordinary reports, as well as informing the Board of Directors accordingly.
8) Monitored the effectiveness of the internal control systems through the work of the Internal Audit Unit and the operations of the Statutory Auditor.
9) Reviewed Company's main risks and uncertainties and their periodical assessment, evaluated the methods used by the Company's Internal control system and Internal Control Unit to identify and monitor risks, and assessed their disclosure in the published financial information in a proper manner.

Statutory Auditors evaluation and selection process

Regarding the auditors, the Audit Committee conducted:

- Since the term of this Audit Committee ended on 1.6.2022, it proceeded to the selection of the same External Audit Company for the year 2022 and submitted a relevant proposal to the annual Ordinary General Meeting of shareholders. It also confirmed their independence, impartiality, objectivity, and integrity.

SUSTAINABLE DEVELOPMENT POLICY FOLLOWED BY SIDMA STEEL S.A.

In accordance with the provisions of Article 44 par. 1 of Law 4449/2017, as replaced by the provisions of article 74 par. 4 para. 9 of Law 4706/2020, the Audit Committee is required to include in the annual report to the Annual General Meeting a description of the sustainable development policy followed by the Company.

SIDMA STEEL has incorporated the principles of Sustainable Development into its business activities and the way it operates, recognizing that these principles are a prerequisite for its long-term development. Care for the health and safety of employees, respect for and protection of the environment, comprehensive coverage of customer needs and harmonious coexistence with the local communities in which it operates are the main themes of the Company's Sustainable Development.
The Sustainable Development Policy follows the Company's values of responsibility, integrity, transparency, efficiency and innovation. The Policy is determined by the Senior Management, which commits to:

- implement the Sustainable Development Policy at all levels and sectors of the Company's activities.
- strict compliance with the applicable legislation and full implementation of the standards, policies, internal guidelines and relevant procedures applied by the Company, as well as other requirements arising from voluntary agreements, which the Company endorses and accepts.

- open, two-way communication with stakeholders in order to identify and record their needs and expectations.
- provide a healthy and safe working environment for its employees, associates and all visitors.
- protect human rights and provide a working environment of equal opportunities, without discrimination.
- continuous effort to reduce its environmental footprint through the implementation of responsible actions and prevention measures in accordance with Best Available Techniques.
- cooperate and support of the local community, for the Company to contribute to the sustainable development of the local areas where it operates.
- constant pursuit of creating added value for its stakeholders

To fulfill the above commitments, the Company, on a voluntary basis, designs and implements the relevant programs, while at the same time setting strategic priorities that focus on the following Sustainable Development axes:

Economic Development and Corporate Governance

The Company strives to achieve positive financial results, applies a system of sound corporate governance, evaluates, and manages business risks in order to safeguard the interests of shareholders.
It develops procedures and takes measures both - to enhance transparency and prevent and combat corruption.
To strengthen corporate transparency and control mechanisms, effective management and optimal operational performance, the Company implements Operating Regulations and has adopted the Greek Corporate Governance Code issued by the Hellenic Corporate Governance Council (ESED), dated June 2021.

Market

The Company aims to achieve the optimal and complete customer satisfaction and invests in research and development, to provide new products and solutions of high quality and added value, thus improving its position in the constantly evolving business environment. In addition, the Company expects responsible business conduct from its suppliers and partners.

Human Resources - Health and Safety at Work

The Company respects and supports internationally recognized human rights and applies policies of fair remuneration, meritocracy, and equal opportunities for all its human resources, without discrimination and with respect to diversity. At the same time, it offers opportunities for development through on-going training and systematic evaluation of its human resources.
Care to provide a healthy and safe working environment is an issue of high importance to the Company.

Environment

In the domain of environmental management, the Company applies the precautionary principle and takes systematic actions to minimize its environmental footprint. The Company operates respecting the principles of the circular economy by ensuring the optimal management of natural resources, promoting recycling of metals, use of secondary raw materials and following practices applied for disposal of discarded materials, considering the "circularity" of the management work.

Local Community

The Company has built up a close relationship based on dialogue and cooperation with the local community – it fully supports the local community and responds sensitively to the issues of its concern. The Company designs and implements actions that respond to the basic needs of the society, in the areas of employment, development, education, health, environment and culture. It encourages volunteering and supports initiatives aimed at sustainable development of the local community.
We remain at your disposal for any additional information or clarification.

Yours sincerely,

The Chairman of the Audit Committee The members

Gerasimos Vardaramatos Vassilia Manolis Panagiotis Konstantinou

Report on the activities of the Audit Committee for the financial year 2022

Aspropyrgos, 14 April 2023

To: The shareholders of the Regular General Meeting of SIDMA STEEL S.A.
Dear Shareholders,

In our capacity as Members of the Audit Committee of the Company under the title "**SIDMA STEEL S.A.**" (hereinafter referred to as the "Company"), for the reference period from 2.6.2022 to 31.12.2022, and in accordance with the provisions of Article 44 of Law 4449 /2017 (hereinafter referred to as the "Law") on the one hand, and the analytical information included in the Disclosures No. 1302/28-4-2017 and 1508/17.7.2020 of the Department of Listed Companies of the Hellenic Capital Market Commission (hereinafter referred to as the "Disclosures") on the other hand, we are presenting below our present Report and disclosing to you, within the scope of the Audit Committee's responsibilities, the findings regarding the subjects regulated by the Law and the aforementioned Disclosures regarding the 2022 fiscal year.

OBJECTIVE OF THE COMMITTEE AND MAIN RESPONSIBILITIES

The objective of the Audit Committee is to support the Board of Directors in fulfilling its responsibilities for supervising the audit procedures to monitor compliance with the legal and regulatory framework relating to:

a) financial reporting,
b) the Internal Control System; and
c) supervising the (external) statutory audit of the Company's separate and consolidated financial statements.

More specifically, the Audit Committee's responsibilities include monitoring:

- **the procedure of the statutory audit** of the company's financial statements and informing the Board of Directors on its contribution to accuracy, correctness, and completeness of the financial information. The AC took into consideration the **supplementary report** submitted by the Statutory Auditor, which shall include the results of the external audit and anything else worth reporting to the BoD.

- **the procedure of preparation of financial reporting** by the company's organizational units and sound disclosure of this information to the investors (announcements to the stock exchange, press releases).

- **adequacy and effectiveness** of all the company's **policies, procedures and controls, sound operating, independence and non-restricted activities of the internal audit unit.**

- **independence of the statutory auditors** (period of cooperation, any incompatible non-audit services, level of remuneration). The Statutory Auditor shall annually submit **an independence statement** and discusses with the members of the AC any threat to his/her independence and assurance.

- **Statutory Auditors selection procedure,** which shall be based on a relevant market research with at least two alternative proposals and conducted in a fully justified manner regarding the final selection of the statutory auditor.

COMPOSITION – RULES OF PROCEDURE

The Audit Committee is a committee of the Board of Directors, consisting of three (3) non-executive members of the Board of Directors. Many of the members of the Audit Committee are independent non-executive members of the Board of Directors in accordance with the provisions of Law 4449/2017 and were appointed by the existing Board of Directors of the Company, at the meeting of June 2, 2022, by authorization of the Ordinary General Meeting of shareholders on the same date.
The composition of this Audit Committee is as follows:

- Sotiris Vardaramatos, Chairman of the Audit Committee, Independent non-executive member of the Board of Directors.
- Vassilia Manoli, Independent non-executive member of the Board of Directors.
- Panagiotis Konstantinou, Non-executive member of the Board.

The members of the Audit Committee fully meet the criteria and independence requirements set out in paragraph 1 of the present Article. All members of the Audit Committee, in accordance with the provisions of paragraph g. 1 of Article 44 of Law 4449/2017, have proven sufficient knowledge of the Company's operating segment and one member has sufficient knowledge in accounting and auditing matters.

MEETINGS

The Audit Committee convenes at the Company's headquarters or via teleconference, in accordance with Article 90 of Law 4548/2018, as effective. The Audit Committee shall convene as often as necessary to effectively perform its duties.
The Committee convened 5 times during the period 02.06.2022 - 31.12.2022. The meetings of the Committee were attended by the Company's Internal Auditor, and depending on the agenda of the meeting, the Statutory Auditor and the external audit team, the Chief Executive Officer, the Chief Financial Officer, and senior management of the Company. While for the period from 1.1.2023 until the writing of this report, (7) meetings were convened, including meetings with the Certified Auditors Accountants to be informed about the progress of the audit and about their audit report and the supplementary report regarding the financial statements of year 2022. A meeting was also held with the evaluation team of the Internal Control System to be informed of their possible findings.

ACTIVITIES OF THE COMMITTEE

The responsibilities of the Committee are defined in **paragraph 3 of Article 44 of Law 4449/2017**. In addition, the Audit Committee has its own separate and updated Rules of Procedure, posted on the Company's website: www.sidma.gr/Investor Relations/Corporate Governance/Audit Committee. The actions of the Committee in contrast to the responsibilities set out in the above provisions are analytically described below.

RESPONSIBILITIES	ACTIONS
Financial reporting procedure and statutory external audit	
According to the provisions of Article 44 of Law 4449/2017 and specifically paragraph 3 (a) and (b), the Committee was responsible for:	
- The procedure and timing of the preparation of financial reporting by the Management.	The Committee held meetings with the Company's management and with the relevant executives to be informed about the financial reporting procedure and the issues that had an impact on the financial statements.
- Briefed by the Statutory Auditor on the 2022 annual statutory audit plan prior to its implementation	We assessed the statutory audit plan and ensured that it covered the most significant audit areas, considering the Company's key areas of business and financial risk. In this context, meetings were held with the

	Statutory Auditor and the audit team both - during the planning stage of the audit and during its conduct and the preparation of the Auditor's Reports for the FY 2022.
- The Commission has monitored, evaluated and reviewed the financial reporting procedure, i.e. the mechanisms and systems applied for preparation, flow and dissemination of financial information and other disclosed information by any means (e.g. stock exchange announcements, press releases).	We established that the financial statements were in accordance with the legally required content and framework for their preparation. Moreover, no weaknesses were found in the preparation of the other disclosed information.
- We have considered and reviewed the most significant matters and risks that could influence the Company's financial statements and significant judgements and estimates made by the management in their preparation.	We have thoroughly examined and evaluated the following issues with reference to specific actions on these issues: 1) We determined that the significant judgments, assumptions, and estimates made in the preparation of the financial statements are reasonable, 2) We evaluated the recoverability of assets, specifically of the trade receivables, 3) We assessed the recoverability of investments in subsidiaries and the adequacy of impairment losses for them, 4) We assessed the recoverability of investments in subsidiaries and the adequacy of impairment losses for them, 5) We have reviewed the disclosures of the main risks addressed by the company and consider them to be adequate as well as the disclosures required by IFRS regarding the above matters, 6) We have reviewed the transactions with related parties and no unusual transactions were identified.
- We were informed about the procedure of the statutory audit of the Company's financial statements, as well as the contents of the auditor's report and the supplementary report submitted by the Statutory Auditor.	We are informed of the contents of the Auditor's Report and the Supplementary Report, with a view to their preparation, by the Statutory Auditor. We informed the Board of Directors about the result of the statutory audit and its contribution to accuracy, completeness, and correctness of the financial information.
- We reviewed the financial reports prior to their approval by the Board of Directors to assess their completeness and consistency with the information brought to our attention and with the accounting principles applied by the Company.	We confirmed completeness and consistency of the financial reports in relation to the information brought to our attention and the accounting principles applied by the company and a recommendation was made to the Board of Directors to approve the Financial Statements prior to publication based on

the accounting principles followed.

Financial reporting procedure

In accordance with the provisions of Article 44 of Law 4449/2017 and specifically paragraph 3 (b), the Committee dealt with:

- The Committee monitored, evaluated and examined the process of drafting the financial information, i.e. the mechanisms and systems for the production, flow and dissemination of the financial information as well as the other publicized information in any way (e.g. stock announcements, press releases).

As we found out, the financial statements were in accordance with the legally required content and framework of their preparation. Also, no weakness was found in the compilation of the other publicized information.

Internal control and risk management system procedures and internal audit unit

In accordance with the provisions of Article 44 of Law 4449/2017 and specifically paragraph 3 (c), the Committee was responsible for:

- Monitoring, reviewing, and evaluating adequacy and effectiveness of the company's policies, procedures and controls regarding the internal control system and the assessment and management of risks related to financial reporting.

The Commission has taken the following actions:

1) Evaluatede the sound operation of the Internal Audit Unit in accordance with professional standards and the applicable legal and regulatory framework and assessing the operations performed by the Internal Audit Unit, its adequacy and effectiveness, without affecting its independence.
2) Evaluated the staffing and organizational structure of the Internal Audit Unit and its potential weaknesses, i.e. whether it lacks the necessary resources, whether it is inadequately staffed with personnel with insufficient knowledge, experience and training.
3) Evaluated the existence or non-existence of constraints on the operations of the Internal Audit Unit, as well as the independence it should have to carry out its operations without obstacles.
4) Reviewed any disclosed information with respect to internal control system and the Company's principal risks and uncertainties with respect to financial reporting.
5) Evaluated the Internal Audit Unit's annual audit plan prior to its implementation, considering the main areas of business financial risk and the results of previous audits. Ensured that the annual audit plan covers the most significant areas of control and systems related to financial reporting. During FY

2022, the Audit Committee approved the revision of the annual audit program to better meet the Group's requirements.

6) Conducted regular meetings with the Head of the Internal Audit Unit on matters within his/her remit and obtaining knowledge of its work and its regular and extraordinary reports, as well as informing the Board of Directors accordingly.
7) Monitored the effectiveness of the internal control systems through the work of the Internal Audit Unit and the operations of the Statutory Auditor,
8) Reviewed the Company's main risks and uncertainties and their periodical assessment, evaluated the methods used by the Company to identify and monitor risks by its Internal control system and Internal Control Unit, and that they are disclosed in the published financial information in a proper manner. The main risks for 2023 are as follows:
   - Macroeconomic environment
   - Credit risk
   - Interest rate risk
   - Liquidity risk
   - Risk of fluctuating prices of raw materials and
   - Foreign exchange risk
   - Information Systems risk

Based on the above assessments and actions, we have concluded that there are no weaknesses requiring improvement.

Statutory Auditors evaluation

Regarding the auditors, the Audit Committee conducted:

- monitored their operations in the context of the statutory audit of the financial statements for the FY 2022,
- evaluated their performance and independence, in accordance with paragraph 3e of Article 44 of Law 4449/2017, Law 4706/2020, as well as paragraph 6 of Article 26 and Articles 5, 6, 21, 22, 23, 23, 26 and 27 of EU Regulation No 537/2014.
- confirmed their independence, impartiality, objectivity, and

integrity as well as the effectiveness of the audit procedure, based on relevant professional standards and regulatory requirements.

SUSTAINABLE DEVELOPMENT POLICY FOLLOWED BY SIDMA STEEL S.A.

In accordance with the provisions of Article 44 par. 1 of Law 4449/2017, as replaced by the provisions of article 74 par. 4 para. 9 of Law 4706/2020, the Audit Committee is required to include in the annual report to the Annual General Meeting a description of the sustainable development policy followed by the Company.

SIDMA STEEL has incorporated the principles of Sustainable Development into its business activities and the way it operates, recognizing that these principles are a prerequisite for its long-term development. Care for the health and safety of employees, respect for and protection of the environment, comprehensive coverage of customer needs and harmonious coexistence with the local communities in which it operates are the main themes of the Company's Sustainable Development.

The Sustainable Development Policy follows the Company's values of responsibility, integrity, transparency, efficiency, and innovation. The Policy is determined by the Senior Management, which commits to:

- implement the Sustainable Development Policy at all levels and sectors of the Company's activities.
- strict compliance with the applicable legislation and full implementation of the standards, policies, internal guidelines, and relevant procedures applied by the Company, as well as other requirements arising from voluntary agreements, which the Company endorses and accepts.
- open, two-way communication with stakeholders to identify and record their needs and expectations.
- provide a healthy and safe working environment for its employees, associates, and all visitors.
- protect human rights and provide a working environment of equal opportunities, without discrimination.
- continuous effort to reduce its environmental footprint through the implementation of responsible actions and prevention measures in accordance with Best Available Techniques.
- cooperate and support of the local community, for the Company to contribute to the sustainable development of the local areas where it operates.
- constant pursuit of creating added value for its stakeholders

To fulfill the above commitments, the Company, on a voluntary basis, designs and implements the relevant programs, while at the same time setting strategic priorities that focus on the following Sustainable Development axes:

Economic Development and Corporate Governance

The Company strives to achieve positive financial results, applies a system of sound corporate governance, evaluates, and manages business risks to safeguard the interests of shareholders.
It develops procedures and takes measures both - to enhance transparency and prevent and combat corruption.
To strengthen corporate transparency and control mechanisms, effective management and optimal operational performance, the Company implements Operating Regulations and has adopted the Greek Corporate Governance Code issued by the Hellenic Corporate Governance Council (ESED), dated June 2021.

Market

The Company aims to achieve the optimal and complete customer satisfaction and invests in research and development, to provide new products and solutions of high quality and added value, thus improving its position in the constantly evolving business environment. In addition, the Company expects responsible business conduct from its suppliers and partners.

Human Resources - Health and Safety at Work
The Company respects and supports internationally recognized human rights and applies policies of fair remuneration, meritocracy, and equal opportunities for all its human resources, without discrimination and with respect to diversity. At the same time, it offers opportunities for development through on-going training and systematic evaluation of its human resources.
Care to provide a healthy and safe working environment is an issue of high importance to the Company.

Environment
In the domain of environmental management, the Company applies the precautionary principle and takes systematic actions to minimize its environmental footprint. The Company operates respecting the principles of the circular economy by ensuring the optimal management of natural resources, promoting recycling of metals, use of secondary raw materials and following practices applied for disposal of discarded materials, considering the "circularity" of the management work.

Local Community
The Company has built up a close relationship based on dialogue and cooperation with the local community – it fully supports the local community and responds sensitively to the issues of its concern. The Company designs and implements actions that respond to the basic needs of the society, in the areas of employment, development, education, health, environment and culture. It encourages volunteering and supports initiatives aimed at sustainable development of the local community.
We remain at your disposal for any additional information or clarification.

Yours sincerely,

The Chairman of the Audit Committee — The members

Sotiris Vardaramatos — Vassilia Manolis — Panagiotis Konstantinou

C.9.6. Other management, supervisory bodies, or committees of the company

Remuneration and Nomination Committee

(a) Composition and term of the Remuneration and Nomination Committee

The Company has established a Remuneration and Nomination Committee in accordance with article 10 of Law 4706/2020, which consists of at least three non-executive members of the Board of Directors, of which at least two (2) are independent non-executive members. The independent non-executive members constitute most of the committee members.

The composition of the existing Remuneration and Nomination Committee is as follows:

1) Efstathia Salaka - Independent Non-Executive Member of the Board of Directors, Chair of the Committee

2) Vassilia Manolis - Independent Non-Executive Member of the Board of Directors, Member of the Committee

3) Panagiotis Konstantinou - Non-Executive Member of the Board of Directors, Member of the Committee

The term of the committee coincides with their term as members of the Board of Directors. In case a member of the Committee leaves, it will be replaced by a decision of the Board of Directors of the Company.

(b) Responsibilities of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee:

a) makes proposals to the Board of Directors regarding the remuneration policy submitted for approval to the general meeting, in accordance with paragraph 2 of article 110 of Law 4548/2018.

b) makes proposals to the Board of Directors regarding the remuneration of persons falling within the scope of the remuneration policy, in accordance with article 110 of Law 4548/2018, and in relation to the remuneration of the Company's executives, especially of the head of internal audit unit.

c) examines the information included in the final draft of the annual remuneration report, providing its opinion to the Board of Directors, before submitting the report to the general meeting, in accordance with article 112 of Law 4548/2018.

d) identifies and proposes to the Board of Directors persons suitable to acquire the capacity of a member of the Board of Directors, based on a procedure provided for under its operating regulation.

(c) Meetings of the Remuneration and Nomination Committee

The Committee meets at least once a year but also whenever it is deemed required by a member or by the Board of Directors and is convened in a meeting by its Chair. During the year 2022, the Remuneration and Nomination Committee held six (6) meetings with the presence of all of its members.

Participation of RNC members to the meetings of the Committee.
Within 2022, 6 meetings of the Committee took place.

FULL NAME	CAPACITY	PERIOD	NUMBER OF MEETINGS IN WHICH HE/SHE WERE A MEMBER OF COMMITEE	MEMBER PARTICIPATION	PARTICIPATION PERCENTAGE IN MEETINGS
SALAKA EUSTATHIA	Chair	01.01.2022-31.12.2022	6	6	100%
MANOLI VASILEIA	Member	01.01.2022-31.12.2022	6	6	100%
KONSTANTINOU PANAGIOTIS	Member	01.01.2022-31.12.2022	6	6	100%

***"Report of the Remuneration and Nomination Committee for FY 2022
of the societe anonyme with the name
SIDMA STEEL S.A.
(the "Company")
GECR Nr. 000361801000***

1. Introduction

The Company has in place a Remuneration and Nomination Committee in accordance with article 10 of Law 4706/2020, which was established by virtue of the decision of the Company's Board of Directors dated 10.6.2021.

The purpose of the present Report is to present a brief short but overall picture of the work of the Remuneration and Nomination Committee for the year 2022 (01.01.2022-31.12.2022). Special mention is made of the activities of the Remuneration and Nomination Committee during the period from 01.01.2023 to 04.03.2023.

The present Report is submitted to the Board of Directors pursuant to the Operation Regulation of the Committee.

2. Duties of the Remuneration and Nomination Committee

Briefly, the duties of the Remuneration and Nomination Committee include, among others:
- *α) making proposals to the Board of Directors regarding the remuneration policy submitted for approval to the general meeting for approval, in accordance with par. 2 of article 110 of Law 4548/2018.*
- *b) making recommendations to the Board of Directors regarding the remuneration of persons falling within the scope of the remuneration policy, in accordance with article 110 of Law 4548/2018, and in relation to the remuneration of the Company's executives, especially of the head of internal audit unit;*
- *c) examination the information included in the final draft of the annual remuneration report, providing its opinion to the Board of Directors, before submitting the report to the general meeting, in accordance with article 112 of Law 4548/2018.*
- *d) identification of persons suitable for acquiring the capacity of the member of the Board of Directors and submission of relevant recommendation to the Board of Directors, based on a procedure provided for under its operating regulation.*
- *e) evaluation of the collective and individual suitability of the members of the Board of Directors and the candidate members of the Board of Directors.*

3. Composition

The Remuneration and Nomination Committee consists of at least three (3) non-executive members of the Board of Directors, of which at least two (2) are independent non-executive members. The independent non-executive members constitute the majority of the committee's members.

The composition of the existing Remuneration and Nomination Committee is as follows:

1. *Efstathia Salaka - Independent Non-Executive Member of the Board of Directors, Chair of the Committee*

2. *Vassilia Manolis - Independent Non-Executive Member of the Board of Directors, Member of the Committee*

3. Panagiotis Konstantinou - Non-Executive Member of the Board of Directors, Member of the Committee

The above persons were members of the Remuneration and Nomination Committee throughout 2022, i.e. during the period from 01.01.2022 to 01.06.2022 following their appointment as members of the Remuneration and Nomination Committee with the decision of the Company's Board of Directors dated 10.06.2021.

4. Meetings of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee meets at least once a year but also whenever it is deemed required by one of its members or by the Board of Directors and is convened in a meeting by its Chair.

During the year 2022, the Remuneration and Nomination Committee met six (6) times, with the presence of all its members. During the period from 01.01.2023 to 03.04.2023, the Committee met three (3) times.

5. Actions of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee during the period from 01.01.2022 to 31.12.2022:

- It carried out an evaluation of its work on an annual basis during its meeting on 08.04.2022 and submitted its Annual Activity Report for the year 2021 to the Board of Directors on 10.04.2022.
- Following the departure of the Company's Internal Auditor and the appointment of a new Internal Auditor by the Board of Directors and considering the recommendation by the Audit Committee regarding the most suitable person to fill the position of Internal Auditor, the committee made a recommendation to the Board of Directors on 25.02.2022 regarding the level of remuneration of the new Internal Auditor.
- Examined all the information included in the final draft of the annual remuneration report for the year 2021 and, after considering the report of the certified public accountants on it, provided during its meeting of 03.05.2022 to the Board of Directors its consent, before the submission of the remuneration report to the Regular General Meeting of the Company, in accordance with article 112 of Law 4548/2018.
- In view of the expiration of the term of office of the members of the Board of Directors, the committee searched for, identified and evaluated candidate members of the Board of Directors and proposed to the Board of Directors at its meeting of 05.03.2022 persons suitable for the acquisition of the status of a member of the Board of Directors in accordance with the procedure provided for in the Regulation of the Remuneration & Nomination Committee and the Suitability and Reliability Policy of the Company's Board Members, taking into account the criteria and incompatibilities provided for in article 3 of Law 4706/2020, in its circular no. 60 Capital Market Commission, in the Suitability and Reliability Policy of Board Members of the Company as well as in the Corporate Governance Code adopted by the Company.
- Formed in a body on 06.02.2022 following the appointment by the Company's Board of Directors as members of the Remuneration & Nomination Committee of Ms. Efstathia Salakas, Ms. Vasileias Manolis and Mr. Panagiotis Constantinou, members of the Board of Directors who were elected by the General Assembly of the Company on 02.06.2022.
- Created forms for the evaluation of the members of the Board of Directors and its Committees in accordance with the Suitability and Reliability Policy of Board Members of the Company.

- Conducted an annual evaluation of the members of the Board of Directors, evaluated the performance of the Chairman of the Board of Directors and the CEO, examined the needs of renewal of the Board of Directors and prepared the Annual Report on the Individual and Collective Suitability of the Members of the Board of Directors and its Committees according to its meeting of 05.07.2022.
- The Board of Directors formulated proposals regarding the remuneration of persons falling within the scope of the Remuneration Policy, in accordance with article 110 of Law 4548/2018 during its meeting of 12.22.2022.
- Examined the Remuneration Policy as well as the Suitability and Reliability Policy of the Board of Directors Members, found that the remuneration policy needs some improvements and recommended to the Board of Directors the submission of a proposal for their review at the next Regular General Meeting.

During the period from 01.01.2023 to 03.04.2023, the Committee met on the following issues:

- Conducted an overview of the Remuneration Policy and its revision for a proposal to be discussed at the company's Board of Directors on 02.24.2023.
- Conducted an annual evaluation of the members of the Board of Directors, evaluated the performance of the Chairman of the Board of Directors and the CEO, examined the needs of renewal of the Board of Directors and prepared the Annual Report on the Individual and Collective Suitability of the Members of the Board of Directors and its Committees as well and reassessed the independence of the independent members of the Board of Directors during its 31.03.2023 meeting.
- It carried out an evaluation of its operations on an annual basis during its meeting on 03.04.2023 and submitted its Annual Activity Report for the year 2022 to the Board of Directors on 03.04.2023.
- Minutes were kept for the meetings of the Remuneration and Nomination Committee, which were approved and signed by its members.

Aspropyrgos, April 03, 2023

C.9.7. Diversity Policy in the composition of the administrative, management and supervisory bodies of the Company

The Company has adopted a Suitability Policy pursuant to Law 4706/2020, which includes, among others, a provision of diversity criteria for the selection of the Members of the Board of Directors. The Company has in place and implements a diversity policy to promote an appropriate level of differentiation in the Board of Directors and a diverse group of members. Through the accumulation of a wide range of qualifications and skills in the selection of the members of the Board of Directors, the variety of views and experiences is ensured so that the right decisions are made. The Policy is included/referred to in the diversity policy to ensure that it has been considered when appointing new members of the Board of Directors. The adequate gender representation of 25% of all members of the Board of Directors is expressly provided for and no exclusion is applied on the grounds of sex, race, color, ethnic or social origin, religion or belief, property, birth, disability, age, or sexual orientation.

C.9.8 Procedure for the compliance with the obligations deriving from articles 99 to 101 of Law 4548/2018

The Company for the purpose of compliance with the obligations deriving from articles 99 to 101 of Law 4548/2018, has in place policies that ensure that the Board of Directors has adequate information to make its decisions relating to related party transactions.

(a) General principles

Related party transactions are based on specific rules for ensuring equal treatment in relation other companies. These rules refer to the various corporate policies (pricing, credit, etc.) that apply to the selection procedures of related companies towards other companies as well as to the preference and exclusivity relationships that the Company develops with the above companies.

The basic principle for the Company's related party transactions is that such transactions are carried out at current market terms (they do not deviate from those of a normal commercial transaction) or if possible, on more favorable terms for the Company. Preference and/or exclusivity relationships exist for the supply of goods or services by affiliated companies, as long as their pricing and supply terms are competitive with those offered by third parties. Respectively, the application of the Company's credit policy to affiliated companies is examined separately and on a case-by-case basis.
Furthermore, for individual transactions developed between the companies and arise from other activities that are not related to the main object of their commercial activity, it is required to draw up an agreement on a case-by-case basis, which sets the limits the rights and obligations of the parties. The final approval of the agreements is the responsibility of the Board of Directors or of its duly authorized body. In addition, the shareholding transactions are carried out in accordance with the provisions of the Company's Articles of Association and are harmonized with the applicable legislation.

(b) Related party transactions monitoring procedure

The Financial Services Department assisted by the Accounting Office is responsible for monitoring and controlling the transactions of affiliated companies. A responsible executive of the Accounting Office reviews, during the execution of its daily work, the accounts in which the transactions with the affiliated companies are registered (General Accounting cards, commercial management, other income-expense cards, etc.), checks whether the transactions are in accordance with the rules governing the Company's relations with its affiliates and points out any exceptions found during the review. Any deviations from the applicable policies are notified by electronic correspondence to the Head of Accounting, for further investigation and to the knowledge of the Director of Financial Services and Human Resources and the General Manager if they continue to apply.

Every quarter, the responsible executive of the Accounting Office, carries out by telephone (or optionally by sending confirmation letters) agreement of the balances of the claims and liabilities between the Company and the affiliated companies and prepares the "List of Intracompany Transactions". The Accounting Manager reviews the agreement and the "List of Intracompany Transactions" for its correctness and completeness and co-signs it as an indication of control and approval. It notifies the list with any exceptions and/or differences to the Director of Financial Services. The competent executive of the Accounting Office files the approved quarterly agreements and lists in chronological order.

During the period of preparation of the semi-annual Financial Statements, a form is sent by the Head of Accounting, to all related companies, which is requested to be returned, completed with the following information of the transactions among them:

- balances of receivables.
- balances of liabilities.
- revenue analysis (e.g., provision of services, sale of products, interest income, leasing income).
- cost analysis (e.g., interest, rent, procurements).
- analysis of purchases and sales of fixed assets.
- reference to the value of the inventories purchased and sold within the company.

- analysis of the share capital increases that took place; and
- any other transaction between them and between the Company.

Under the responsibility of the Director of Financial Services, the Head of Accounting prepares a "Consolidated List of Intracompany Transactions" for the semester and submits it to the Board of Directors of the Company for its information. On an annual basis and during the preparation of the Company's Financial Statements, the Head of Accounting reviews the agreement of the balances of claims and liabilities between all related companies and prepares the "Intracompany Transactions List", which is approved by the Chief Financial Officer and submitted to the Board of Directors, so that the transactions and accounting balances among all affiliated companies are disclosed.

Based on the "List of Intracompany Transactions", the Board of Directors of the Company prepares an annual report, in which the intracompany relations, transactions and intracompany balances between the Company and its subsidiaries are referred.

C.9.9 Suitability Policy of the members of the Board of Directors

The Suitability and Reliability Policy was prepared by the Board of Directors of the Company and was approved by the General Meeting dated 10.06.2021 and concerns the members of the Board of Directors. The Suitability Policy includes the principles concerning the selection or replacement of the members of the Board of Directors or the renewal of the term of the existing members, as well as the criteria for assessing the suitability of the members of the Board of Directors and the provision of diversity criteria.

C.9.10 Internal Control System evaluation report

Pursuant to article 3 item g of Law 4706/2020 and decision 1/891/30.09.2020 of the Hellenic Capital Market Commission, the Company conducts periodic evaluations of the Internal Control System, as to the adequacy and effectiveness of the financial information, the risk management and regulatory compliance, as well as the implementation of the provisions on corporate governance of Law 4706/2020.

C.9.11 Sustainable Development Policy (ESG)

The Company is not obliged to draft and adopt a sustainable development policy of article 151 of Law 4548/2018, as the provisions of the latter article (non-financial statements) are addressed to large companies that are public interest entities, within the meaning of Annex A of Law 4308/2014 and which, at the closing date of their balance sheet, exceed the average number of five hundred (500) employees during the financial year, given that the Company does not employ more than five hundred employees.

Nevertheless, the Company has prepared a Sustainable Development Policy recognizing that the care for the health and safety of employees, the respect and protection of the environment, the complete coverage of the needs of the customers and the harmonious coexistence with the local communities in which it operates are prerequisite for its development. To fulfill the above commitments, the Company on a voluntary basis plan and implements relevant programs, while at the same time sets strategic priorities which focus on the following axes of Sustainable Development:

Economic Development and Corporate Governance: The Company aims to achieve positive financial results, implements a system of good corporate governance, evaluates, and manages business risks to safeguard the interests of shareholders. Develops procedures and takes measures to enhance transparency as well as to prevent and combat corruption.

Market: The Company aims at the optimal and complete customer satisfaction and invests in research and development, to provide new products and solutions of high quality and added value, thus improving its position in the constantly evolving business environment. In addition, the Company expects responsible business behavior from its suppliers and partners.

Human Resources - Health and Safety at Work: The Company respects and supports internationally recognized human rights and implements policies of fair reward, meritocracy and equal opportunities for all its human resources, without any discrimination and with respect for diversity. At the same time, it offers opportunities for development through continuous training and systematic evaluation of its human resources. It is of great importance for the Company to provide a healthy and safe working environment.

Environment: The Company in the field of environmental management applies the principle of prevention and carries out systematic actions to minimize its environmental footprint. The Company operates with respect to the principles of the circular economy, ensuring the optimal management of natural resources, promotion the recycling of metals, the utilization of secondary raw materials and following practices of disposal of discarded materials considering the "circularity" of management work.

Local Community: The Company is on the side of the local community and responds sensitively to issues that concern it, having developed a close relationship based on dialogue and cooperation. The Company plans and implements actions that meet the basic needs of society, in matters of work, development, education, health, environment, and culture. It encourages volunteering and supports initiatives for the sustainable development of the local community.

C.9.12 Information data required under article 10 par.1 of Directive 2004/25/EU, with respect to take over bids

The above information data are referred in detail in the Explanatory Report of the Board of Directors to the general meeting of the shareholders (par. C. 10)

The present Corporate Governance Statement constitutes integral and special part of the annual Management Report of the Company's Board of Directors.

C.10 Explanatory Report of article 4, par. 7 of Law 3556/2007

(a) Share capital structure

On 31.12.2022, the Company's share capital amounted to €18,336,001,05 (eighteen million three hundred thirty-six thousand one euro and five cents) and is divided into 13.582.223 common registered shares with nominal value of €1.35 each.

Pursuant to the Shareholders' Register of the 31 December 2022, the Company's shareholding structure was the following:

SHAREHOLDERS	Shareholder's book No. of shares	31/12/2022 Stake %
BITROS STEEL S.A.	3.395.556	25,00%
SOVEL S.A.	2.842.500	20,93%
SIDACIER HOLDING S.A.R.L.	1.580.230	11,63%
SIDENOR STEEL INDUSTRY S.A.	797.918	5,87%
VICTOR PIZANTE, son of ANDREA	700.277	5,16%
RAPALLO INVEST HOLDING S.A.	692.602	5,10%
NELLY AMARIGLIO, daughter of DANIIL ANDREA	300.889	2,22%
DAVID AMARIGLIO, son of DANIIL ANDREA	300.889	2,22%
SANTY AMARIGLIO, daughter of ANDREA	173.882	1,28%
NATALY PIZANTE, daughter of ANDREA	88.093	0,65%
MARCEL AMARIGLIO, son of LEON	25.190	0,19%
PUBLIC INVESTORS	2.684.197	19,76%
Total	**13.582.223**	**100,00%**

All (100%) of the Company's shares are dematerialized common, registered, with voting right, indivisible and traded on the main market of Athens Exchange. There are no special share types. Rights and obligations accompanying the shares are the usual ones and are set out in the relevant articles of the Articles of Association (articles 7, 8, 9, 10 and 24).

The main rights and obligations arising from the Company's shares, pursuant to the Company's Articles of Association and Law 4548/2018 read as follows:

- right to participate and vote in the Company's General Meeting.
- pre-emption right in case of a capital increase other than by contributions in kind, or issue of bonds convertible into shares.
- the right to participate in the distribution of any annually distributable dividend, in proportion to the said shareholder's participation in the share capital.
- right to participate in the liquidation proceeds of the company's assets, in case of dissolution of the Company.

The shareholders' liability is limited to the amount of the nominal value of each share.

(b) Restrictions to the transfer of the Company's shares

The Company's Articles of Association does not provide for any restrictions to the transfer of the Company's shares (see however below under item f on the provisions of the Shareholders Agreement). Therefore, the Company's shares are freely transferable and are transferred in accordance with law 4548/2018 and the relevant rules of the Athens Exchange.

(c) Important direct or indirect participations according to Law 3556/2007

As of 31 December 2022, and of which the Company is not aware of any shareholders, other than those referred in the table under item a above, with a direct or indirect percentage exceeding 5% of the total number of shares in the Company and the respective voting rights in the Company.

(d) Holders of shares that grant special control rights
There are no shares in the Company that grant special control rights.

(e) Restrictions on voting rights – Deadlines in exercising relevant rights
There are no statutory limitations to the voting right. The common deadlines for the proof of shareholder status in accordance with the registration date provided for in article 124 par. 6 of Law 4548/2018 apply, as a condition for the participation to the General meeting. Pursuant to the Company's Articles of Association, ownership of one share gives the right to one vote and the votes are always increased by the ratio of one vote per share.

Each shareholder that has and proves its capacity as shareholder in accordance with the provisions of article 124 of Law 4548/2018 can participate to the General Meeting. Any person registered on the Registration Date at the Dematerialized Securities System (DSS) of the societe anonyme "HELLENIC CENTRAL SECURITIES DEPOSITORY SOCIETE ANONYME" (ATHEXCSD) or the person identified as such based on the relevant date through registered intermediaries or other intermediaries in compliance with the provisions of legislation (Law 4548/2018, Law 4569/2019, Law 4706/2020 and Regulation (EU) 2018/1212) as well as the Hellenic Central Securities Depository Rulebook (Government Gazette B' /1007 /16.03.2021) is considered by the Company to be a shareholder who has the right to participate in the General Meeting and to exercise the voting right.

As the shares in the Company are listed on the ATHEX, each person having the shareholder status at the beginning of the fifth day prior to date of the initial meeting of the General Meeting (record date) has the right to participate in the General Meeting (initial or reconvened). The above record date is also valid in case of postponed or reconvened General Meeting, provided that the postponed or reconvened General Meeting takes place no later than thirty (30) days from the record date. If this is not the case or if a new invitation is published for the reconvened meeting, pursuant to the provisions of article 130 of Law 4548/2018, each person appearing as shareholder at the beginning of the third day prior to the postponed or reconvened meeting is entitled to participate in the General Meeting. The shareholder status can be proven by any legal means and in any case on the basis of the information that the Company receives by the société anonyme ATHEXCSD if ATHEXCSD provides register services or through the participants and registered intermediaries with ATHEXCSD in any other case. A shareholder may participate in the General Meeting based on confirmations or notifications of articles 5 and 6 of Regulation (EU) 2018/1212 provided by the intermediaries unless the meeting refuses this participation for a significant reason that justifies its refusal in accordance with the applicable provisions (article 19 par. 1 Law 4569/2018, article 124 par. 5 Law 4548/2018).

The Shareholder has as many votes as the shares it holds. Shareholders can participate in the General Meeting through a representative. The appointment, revocation or replacement of the representative is done in writing (including by simple letter) or by electronic correspondence message (e-mail) and is submitted to the Company no later than forty-eight (48) hours before the scheduled date of the meeting of the General Meeting. Minors and detainees, as well as legal entities, are represented by their legal representatives.

The shareholders can participate in the General Meeting remotely by audio-visual or other electronic means, without physical presence at the venue. Subject to any relevant decisions and provisions, shareholders may participate in the voting at the General Meeting of shareholders remotely, by mail or by electronic means, prior to the General Meeting, which is enabled by sending in advance to the shareholders the items of the agenda of the General Meeting and the ballot papers relevant to such items. The items of the agenda as well as the ballot can be made available and filed in electronically via the internet. Shareholders voting by such means are counted for quorum and majority purposes, provided that the relevant votes have been received by the Company no later than twenty-four (24) hours prior to the beginning of the meeting.

A natural person participating in the share capital of the Company and being member of its Board of Directors may not have the right to vote in the General Meeting of shareholders for the assignment of audit of the financial statements to a statutory auditor or audit firm.

The shareholders or representatives of shareholders who do not comply with the above may participate in the General Meeting only after its permission.

(f) Shareholder agreements providing for restrictions on the transfer of shares or the exercise of voting rights

There are no shareholder agreements regarding restrictions in the exercising of voting rights that are known to the Company.

The shareholders of SIDMA, SOVEL S.A., SIDACIER HOLDING SA, SIDENOR STEEL INDUSTRY S.A., RAPALLO INVEST HOLDING S.A. and PROSINTER S.A. (the "SIDMA's Main Shareholders") and BITROS STEEL S.A. as well BITROS HOLDINGS S.A., shareholder of BITROS STEEL S.A., have signed a shareholders' agreement dated 08.05.2019 ("Shareholders' Agreement"), which governs the rights between these shareholders in SIDMA and provides for (a) the prohibition to transfer, as well as pledge or in any other way earmark or encumber SIDMA's shares held by BITROS for a five-year period from the completion of the Share Capital Increase without the prior written consent of the majority of SIDMA's Main Shareholders, as well as the prohibition, following the expiration of the above five-year period, to pledge or earmark or encumber in any other way the shares held by BITROS in favour of any person competing with SIDMA, without the prior written consent of the other shareholders; and (b) the right of first refusal of SIDMA's Main Shareholders, following the expiration of the above five-year period, in case of intention to transfer the shares in SIDMA held by BITROS, under specific conditions and exceptions.

The Shareholders' Agreement is binding solely on the parties to the Shareholders' Agreement and does not bind persons that are not parties thereto.

(g) Rules of appointment / replacement of the members of the Board of Directors and amendment of the Company's Articles of Association in derogation from the provisions of Law 4548/2018.

The Articles of Association do not provide for any rules for the appointment / replacement of Board of Directors members or for the amendment of the Articles of Association in derogation from the provisions of Law 4548/2018.

However, the Shareholders' Agreement (see above under f) provides for the right of BITROS STEEL S.A. to nominate for election by the SIDMA General Meeting of shareholders, two (2) of the members of the Board of Directors for as long as it holds at least 20% of the Company's share capital, and one (1) member in case BITROS holds less than 20% but at least 10% of the Company's share capital.

The Shareholders' Agreement is binding solely on the parties to the Shareholders' Agreement and does not bind persons that are not parties thereto.

(h) Power of the Board of Directors to issue new shares or acquire own shares according to article 49 of Law 4548/2018

h.1. Pursuant to article 6 of the Company's articles of association only the General Meeting has the right to increase its share capital by taking a decision by an increased quorum and majority.
The General Meeting may, however, in the context of the regular share capital increase, authorize the Board of Directors to decide on the sale price of the new shares within a time period set by the General Meeting and which may not exceed one (1) year.

h.4. It is forbidden that the Company and the members of the Board of Directors acquire shares in the Company, except in the cases and under the conditions imposed by the legislation in force from time to time.

There is no decision of the General Meeting for the acquisition of own shares pursuant to article 49 of Law 4548/2018, as in force.

There is no decision of the General Meeting in force for the allocation of options on shares of the Company pursuant to articles 49, 113 and 114 of Law 4548/2018, as in force.

(i) Significant agreements of the Company that enter into force / are amended / expire in case of a change in the Company's control following a take-over bid.

No such agreements exist.

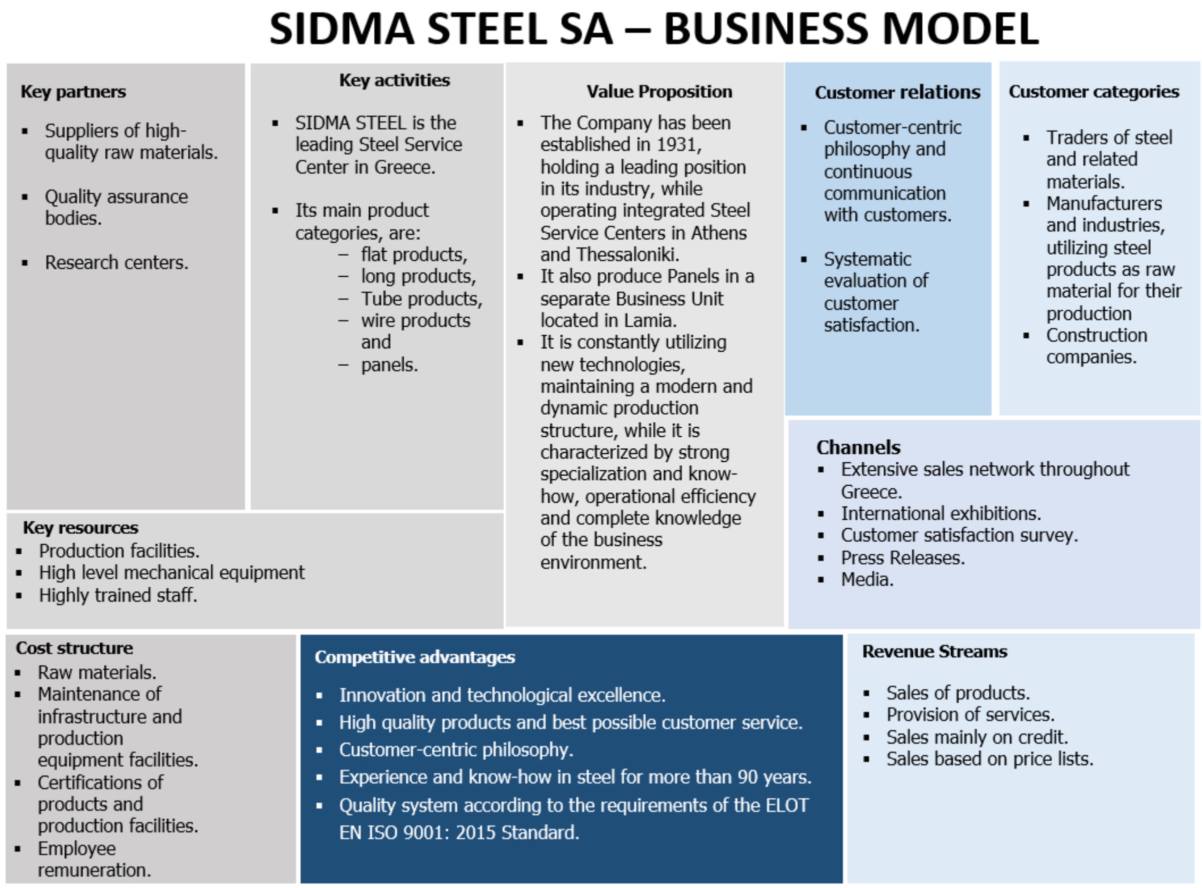
(j) Agreements regarding compensation of members of the Board of Directors or personnel in case of resignation, termination of their employment agreement without an essential cause or expiration of their term/ agreement due to public tender offer

No such agreements exist.

C.11 Non-financial Reporting

SIDMA STEEL S.A. (hereinafter the "Company") is a leader in the field of trade and industrial processing of steel products and in the production of metal construction materials and thermal insulation panels. It operates two integrated steel service centres in Athens and Thessaloniki and production facilities in the Industrial area of Lamia for the design and production of thermal insulation panels.
Corporate responsibility and the incorporation of sustainable development principles are at the core of the Company's operations, whereas one of its key priorities is not only to maintain its leading position in the Greek market but also to create value for all stakeholder groups. Furthermore, it is important for the Company to be a model company, constantly growing with a focus on social responsibility. Moreover, the Company is also distinguished for its appreciation of its people and the efforts it makes to protect the natural environment and support vulnerable social groups.

Our business model is shown below:



Management of Sustainable Development Issues

The Company, acknowledging that the principles of sustainable development constitute a necessary condition for its long-term development and the effective management of non-financial risks, operates based on said principles and incorporates them in its daily operations. The preservation of the high quality of the products, the constant satisfaction of the customer, the promotion of occupational health and safety in all activities, the protection of the natural environment and the support to local communities where it operates, constitute important aspects of its responsible business.

The team that has been established, consisting of executives of all departments and directorates, holds an important role in the effective management of Sustainable Development issues. The Sustainable Development team is responsible for the development and implementation of the annual action plan per axis, as well as for the monitoring and recording of material issues of the Company in relation to stakeholders.

Furthermore, recognizing the importance of developing actions to contribute to the achievement of the United Nations Sustainable Development Goals (SDGs), the Company has proceeded to link its material issues with the Goals.

Policies and Systems

The Company, in the context, has established specific policies and implements appropriate management systems and relevant procedures that determine the way the business objectives are achieved, simultaneously enhancing the framework of its responsible operation, e.g.:

- Confidentiality Policy
- Sustainable Development Policy
- Vendor and Partner Code of Conduct
- Quality Policy
- Occupational Health & Safety Policy
- Environmental Policy
- Personal Data Protection Policy
- Internal Control Unit Code of Conduct
- Remuneration Policy
- Code of Ethics and Business Conduct
- Regulatory Compliance Policy
- Anti-Bribery & Anti-Corruption Policy
- Reports & Complaints Management Policy
- Suitability & Reliability Policy

The Company manages Sustainable Development issues in all its activities and facilities through the development and implementation of certified management systems, e.g.:

- **Quality Management System**, according to the ISO 9001:2015 standard
- **Occupational Health & Safety System**, according to the ISO 45001:2018 standard

Key human resources figures

Personnel by geographical region of origin	2021	2022
Total Employees	**159**	**165**
Athens	*78*	*80*
Lamia	*27*	*27*
Thessaloniki	*54*	*58*
Percentage of full-time employees	**100%**	**100%**
Joined	**12**	**14**
Employees left	**16**	**8**

Personnel by gender and age category 2022	<30	30-50	51+
Men	10	68	59
Women	2	17	9
Total	**12**	**85**	**68**

Labour and Social issues

The Company constantly ensures a safe and meritocratic work environment and puts human resources in the centre of its activities, supporting all employees for the entire duration of their professional career and development.

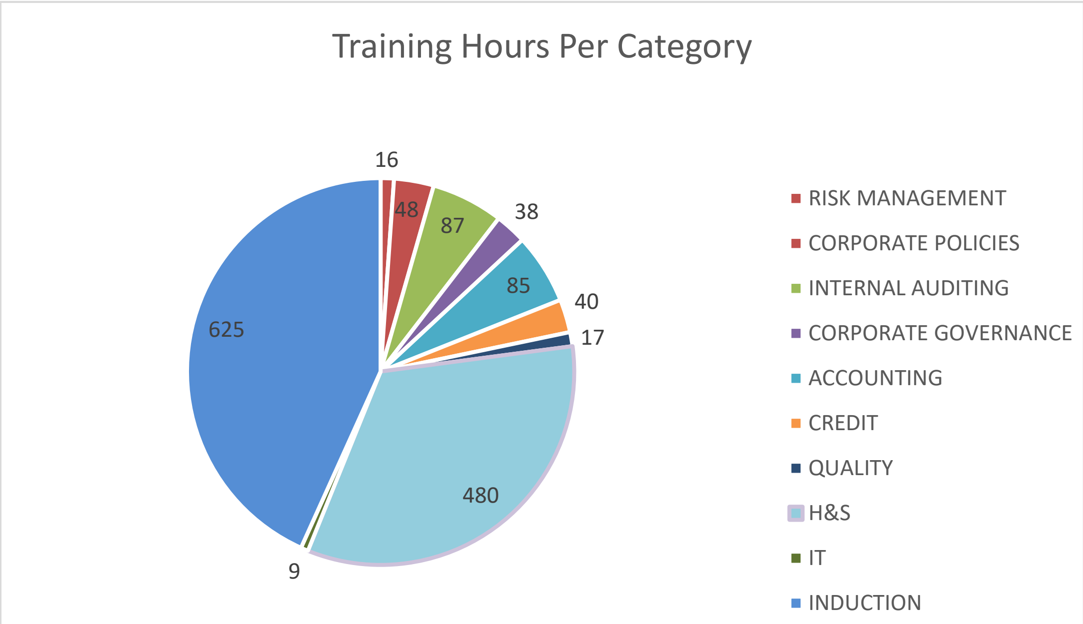
The Company focuses on the following main axes regarding human resources:

- Promotion and maintenance of a safe work environment in its facilities
- Retention and attraction of new talent
- Continuous training for the professional and personal development of its people
- Attraction of employees from the local community
- Provision of equal opportunities and zero tolerance to discrimination
- Open communication

The Company implements Internal Operating Regulations and has adopted a Code of Ethics and Business Conduct, which includes the fundamental principles and values that shape the framework of its business activities. The Code is based on the ten principles of the United Nations Global Compact with regard to human rights and working conditions, and it applies to all Directors, shareholders, employees as well as to all customers and business partners.

Employee training and continuous development

The Company places particular emphasis on the continuous development of its employees, contributing in the expansion of their skills and the achievement of their personal goals. The Company provides training programs on new technologies and systems, methods, and processes, as well as on Health, Safety and Environmental matters. Said programs are available to all employees, regardless of rank. The training program includes orientation to new employees, to provide all the information required for their smooth integration in the Company.



During 2022, the Company conducted 1,445 hours of training.

Performance evaluation

Performance evaluation is a key element for the continuous improvement of the Company's people, and for their personal and professional development. The implemented procedure recognizes the positive contribution of all employees, whereas it offers additional incentives for further improvement by goal setting. The Company currently implements an integrated evaluation system only for the Board of Directors, who are all evaluated at 100% of their performance, on an annual basis and at the end of the year, an evaluation system will be totally implemented and has already been applied to all personnel at SIDMA ROMANIA.

Equal opportunities and respect for human rights

The Company, respecting human rights and with responsibility to its people, recognizes and respects the internationally established and inalienable human rights as well as the statutory labour rights, to provide equal opportunities without discriminations based on gender, nationality, religion, age and educational level. The Company demonstrates zero tolerance to incidents of violence and harassment in the workplace.

Occupational Health and Safety

The Company, aiming to protect the health and safety of its employees and partners, ensures the best working conditions in its facilities, and implements all the required updates to the equipment of its production plants to minimize the possibility of an accident or incident.

The Company has developed an integrated Quality and Occupational Health and Safety System according to ISO 9001:2018 and ISO 45001:2018, which applies to all facilities and covers all activities, whereas it places particular emphasis on the prevention and prompt management of hazards and the continuous awareness and training of employees. The Company, in the context of implementation of the Management System, has set as a priority the prompt management of accidents and incidents, and improvement actions and additional preventive measures are implemented immediately in the event of an incident. Furthermore, it is worth mentioning that the Company ensures:

- The performance of regular inspections by appropriately training and authorized personnel.
- The provision of appropriate Personal Protective Equipment.
- Continuous monitoring and compliance with legislation, international standards, and good practices.
- The development of a targeted action plan for the management of emergencies.

The Company uses internationally applied and measurable indicators to monitor and evaluate performance in occupational health and safety matters.

Health and Safety Indicators	2021	2022
Lost Time Incident Rate (LTIR) (1)	0	2,9
Lost Time Incidents Severity Rate (LTISR) (2)	0	197
Absenteeism Rate (AR) (3)	0.78%	1,93%
Incidents (Number of employee incidents)	0	1
Number of occupational diseases	0	0

1) *Lost Time Incident Rate (LTIR): (number of incidents with absence from full-time work / man-hours of work) x10^6*
(2) *LTISR (Lost Time Incidents Severity Rate) (Number of days of absence from work due to an accident / man-hours of work) x10^6*
(3) *Absenteeism Rate (AR): (Number of days of absence from work due to any impediment / man-hours of work) %*

Social Contribution

The Company supports local communities and covers a significant part of its human resources needs from their workforce. Furthermore, it supports in every possible way social activities conducted in local communities and it collaborates with NGOs in order to address the needs of vulnerable social groups. The Company's social contribution axes regard the following:

- Support of local employment
- Support of local economy by supporting local suppliers
- Development of social activities
- Volunteering

Environmental matters

The Company complies with the strictest rules and specifications on the respect and protection of the environment, taking into consideration every scientific development, and it continuously monitors and evaluates all the environmental aspects of its activities. Enhancing its efforts, it implements an Environmental Policy, and, in the context of the prevention principle, it implements actions based on said policy. Furthermore, it gives special importance to the responsible management of energy and the reduction of its carbon footprint, aiming to an efficient use of the energy used for its activities and highly adopting energy efficient technologies.

Supply chain

The Company has developed and implements a Vendor and Partner Code of Conduct which aims to ensure that all its vendors, consultants and partners share the same fundamental responsible business values and principles. All partners are expected to operate in compliance with said principles and the Company's Code and to promote them in the context of their own supply chain. The Vendor and Partner Code of Conduct emphasized the following aspects:

- Business ethics and anti-corruption
- Labour and human rights
- Occupation health and safety
- Protection of the environment
- Compliance with laws and regulations

The Company has adopted and implements specific procedures for the evaluation of every vendor and partner, pursuing collaboration with vendors that adopt responsible practices. The vendors collaborating with the Company are evaluated, inter alia, based on key aspects of the collaboration and the services/products provided, e.g. the quality of the products, the level of competitiveness on which the partner of vendor operates, the price, the payment methods and the consistency of the delivery of the final product or service.

Non-Financial Risks

The Company operates in a financial and social environment characterized by various financial and non-financial risks. In this context, the Company has established procedures for their monitoring and effective management. The main categories of non-financial risks for the Company are environmental and occupational health and safety risks.

1. Climate Change

Climate change is now considered one of the most important global issues with a significant negative impact not only on the Company's operations but also to the climate, the wider natural environment, and the society. In this context, companies face transition and natural risks. The mitigation measures for said risk applied by the Company include:

- monitoring of the relevant trends of National and European policy.

- the development of action plans and specific long-term goals for investments in energy efficient equipment and carbon emission reduction measures.
- the procurement of electricity from clean, renewable energy producers.

2. Occupational health and safety

One of the most significant risks associated with labor and social issues is the health and safety of personnel at the workplace as well as other related labor issues, such as accidents and injuries. The Company implements a certified occupational health and safety management system, to continuously monitor safety parameters and potential occupational hazards. Moreover, the Company ensures the provision of continuous training and updates to further enhance a safety culture.

3. Anti-Bribery & Anti-Corruption

The risks associated with the prevention of bribery and corruption consist in the failure to conduct business operations in an ethical manner and in compliance with applicable laws and regulations. In order to prevent such incidents, the Company implements a Code of Ethics and Business Conduct, a Regulatory Compliance Policy, an Anti-Bribery & Anti-Corruption Policy and a Reports & Complaints Management Policy and instructs all personnel accordingly.

Risk Management

The Company implements a comprehensive framework for a correct and effective risk management, and a related Risk Management Policy. A Risk Manager is appointed for this purpose, whose main duty is to monitor and improve the Company's Risk Management operations and policies, adopting a systematic approach for their detection, recording, assessment and management. The Risk Manager reports to the Company's Managing Director and their activity is monitored by the Audit Committee. Risk management is monitored using the dedicated Risk Management Action Plan, the implementation of which is reviewed on a regular basis and the progress of the implementation is monitored based on the documentation of the actions implemented by each manager.

Transparency and anti-corruption issues

Transparency and anti-corruption issues management

The lawful and ethical business conduct, with respect to society and the environment, constitutes one of the non-negotiable principles of the Company. The concepts of bribery and corruption described in the Company's Internal Operating Regulations not only constitute serious criminal and civil offences but are also contrary to the values and principles of the organization. The Anti-Bribery & Anti-Corruption Policy implemented by the Company gives particular importance to the prevention of bribery and other corruption practices, and for this purpose financial records and files are prepared, reported, and retained with completeness and accuracy. Furthermore, the Company implements appropriate internal audits and safeguards that document the business justification for payments to third parties. Lastly, and based on the provisions of the Code of Ethics and Business Conduct, the Company prioritizes the provision of correct information to all the Company's executives, employees, workers, and partners regarding said issues.

Report management procedure

The Company ensures the adoption of safe communication channels for internal reports, in the context of the Reports & Complaints Management Policy. SIDMA STEEL S.A.'s goal is to enhance confidentiality by effectively managing reports and complaints, simultaneously guaranteeing that reports and complaints are taken into serious consideration and remain confidential, to the extent that they do not conflict with applicable legislation. All employees have been informed about the Policy, and the Company encourages them to express their concerns through the procedure for the submission and management of reports and complaints that is already implemented.

Internal Control Unit

The Internal Control Unit ensures the efficiency and effectiveness of corporate operations, the reliability of financial reporting, the compliance with applicable laws and regulations and the efficiency and effectiveness of risk management, whereas it operates in accordance with the Internal Control Unit Code of Conduct implemented by the Company. The head of the internal control unit is appointed by the Company's Board of Directors, following decision of the Audit Committee, is a dedicated full-time employee, personally and operationally in depended on and objective during the performance of their duties and has the appropriate knowledge and relevant professional experience.

Information and data security

IT systems security

The Company protects privacy and all confidential information originating from business transactions and exclusive collaborations as a matter of corporate governance. Personal and corporate data is protected from unauthorized access, loss, or manipulation, using every available organizational, procedural, and technological measure.

Personal data protection

The Company, respecting the protection of personal data, takes all the appropriate measures pursuant to the provisions of the Regulation (EU) 2016/679 (General Data Protection Regulation) and other applicable laws. To comply with international standards and best practices, the Company adopts specific procedures and mechanisms with the ultimate goals of continuous vigilance and the protection of personal data in its operations.

Aspropyrgos, Attiki, 20 April 2023

President
PANAGIOTIS BITROS

Vice president
VICTOR PISANTE

C.E.O
ANTONIOS KARADELOGLOU

Members

NIKOLAOS MARIOU **STAVROS GATOPOULOS** **MICHAIL SAMONAS**

PANAGIOTIS KONSTANTINOU **GERASIMOS VARDARAMATOS** **VASILEIA MANOLI**

EYSTATHIA SALAKA

D. Annual Financial Statements

D.1 Statement of Financial Position

S I D M A S T E E L S.A.
Statement of Financial Position
for the period from 1st January to 31st December 2022

Amounts in EURO		Group		Company	
		31.12.2022	**31.12.2021**	**31.12.2022**	**31.12.2021**
Assets	Notes				
Non Current Assets					
Tangible Assets	**8.1**	41.923.133	42.728.083	31.116.442	31.825.585
Intangible assets	**8.2**	530.196	523.102	82.523	103.164
Investments in subsidiaries	**8.3**	-	-	18.943.116	18.943.116
Other non current assets	**8.4**	170.470	74.953	161.640	70.108
		42.623.799	**43.326.137**	**50.303.721**	**50.941.973**
Current Assets					
Inventories	**8.5**	44.612.742	42.095.202	32.626.018	28.439.472
Trade and other receivables	**8.6**	56.342.122	54.937.180	47.950.920	47.826.597
Other receivables	**8.7**	10.642.749	8.018.234	9.871.989	7.439.384
Derivatives	**8.8**	1.428.312	-	1.428.312	-
Cash and cash equivalents	**8.9**	8.481.728	12.724.447	1.757.487	11.430.821
		121.507.654	**117.775.064**	**93.634.725**	**95.136.275**
Total Assets		**164.131.454**	**161.101.201**	**143.938.447**	**146.078.248**
EQUITY					
Shareholders of the mother company:					
Share Capital	**8.10**	18.336.000	18.336.000	18.336.000	18.336.000
Share Premium	**8.10**	13.296.000	13.296.000	13.296.000	13.296.000
Reserves	**8.11**	29.085.237	27.820.123	24.402.050	23.322.637
Retained Earnings		(38.850.906)	(46.606.341)	(26.233.048)	(30.489.630)
Total Shareholders Equity of the mother company		**21.866.332**	**12.845.782**	**29.801.002**	**24.465.007**
Non-controlling interests		-	-	-	-
Total Shareholders Equity		**21.866.332**	**12.845.782**	**29.801.002**	**24.465.007**
Liabilities					
Non Current Liabilities					
Long-term loans	**8.12**	55.660.973	64.012.416	49.452.649	51.880.144
Grants for investments in fixed assets	**8.13**	12.462	26.242	12.462	26.242
Deferred Tax Liabilities	**8.14**	7.031.986	6.902.949	6.792.288	6.663.230
Provision for Retirement benefit obligation	**8.15**	677.100	638.502	669.406	632.866
Total Non-Current Liabilities		**63.382.522**	**71.580.110**	**56.926.805**	**59.202.482**
Current Liabilities					
Trade Payables	**8.16**	49.067.150	49.642.947	35.071.059	38.136.132
Short-term loans	**8.12**	19.290.740	13.408.286	12.880.305	12.517.778
Current installments of long-term loans	**8.12**	4.128.504	4.949.281	3.604.002	3.822.833
Other Payables	**8.17**	3.174.845	5.529.628	2.496.953	4.911.450
Income tax and duties	**8.26**	3.221.361	3.145.167	3.158.321	3.022.567
Total Current Liabilities		**78.882.600**	**76.675.309**	**57.210.640**	**62.410.759**
Total Liabilities		**142.265.122**	**148.255.419**	**114.137.445**	**121.613.240**
Total Equity and Liabilities		**164.131.454**	**161.101.201**	**143.938.447**	**146.078.248**

The accompanying notes form an integral part of these Annual Separate and Consolidated Financial Statements

SIDMA STEEL S.A.

D.2 Statement of Comprehensive Income

S I D M A STEEL S.A.
Statement of Comprehensive Income
for the period from 1st January to 31st December 2022

Amounts in EURO	Notes	Group		Company	
		1.1 - 31.12.2022	**1.1-31.12.2021**	**1.1 - 31.12.2022**	**1.1-31.12.2021**
Turnover (sales)	**8.18**	265.304.207	226.409.561	173.022.520	150.068.051
Cost of Sales	**8.19**	(239.567.107)	(191.745.882)	(153.981.768)	(123.954.147)
Gross Profit		**25.737.100**	**34.663.680**	**19.040.752**	**26.113.903**
Other income	**8.20**	7.159.905	6.340.761	5.232.376	4.887.851
Administrative Expenses	**8.21**	(4.002.095)	(4.178.091)	(2.800.753)	(2.957.014)
Distribution/Selling Expenses	**8.22**	(12.612.255)	(10.961.386)	(9.850.138)	(8.713.069)
Other expenses	**8.23**	(112.170)	(320.560)	(90.927)	(308.594)
Operating Profit (EBIT)		**16.170.484**	**25.544.405**	**11.531.310**	**19.023.077**
Finance Costs (net)	**8.24**	(6.598.933)	7.135.870	(5.945.971)	8.300.641
Income from investing operations	**8.25**	226.044	(962.372)	226.044	(962.372)
Profit before taxation		**9.797.595**	**31.717.903**	**5.811.383**	**26.361.346**
Less: Income Tax Expense	**8.26**	(1.869.919)	(6.097.772)	(1.605.276)	(5.804.079)
Profit/(loss) after taxation for continued operations (a)		**7.927.676**	**25.620.131**	**4.206.107**	**20.557.266**
Attributable to:					
Shareholders of the mother Company		7.927.676	25.620.131		
Non-controlling interests		-	-		
		7.927.676	**25.620.131**		
Basic earnings (losses) after tax per share	**8.27**	***0,5837***	***1,8863***	***0,3097***	***1,5135***
Depreciation & Amortization Expense		1.579.907	1.574.294	1.146.038	1.141.430
EBITDA		**17.750.391**	**27.118.699**	**12.677.348**	**20.164.507**
Other comprehensive income					
Items that will never be reclassified to profit or loss:					
Revaluation of defined benefit employment plans	**8.15**	27.922	(32.924)	28.293	(32.429)
Deferred Taxation	**8.14**	22.218	269.642	22.181	269.593
Items that are or may be reclassified to profit or loss					
Interest Rate Swap	**8.8**	1.420.280	-		
Exchange differences	**8.11**	(4.165)	82.426	-	-
Related Tax	**8.14**	(340.867)	-	(340.867)	-
Other Comprehensive Income after taxes	**8.14**	**1.125.388**	**319.144**	**1.129.887**	**237.164**
Total Comprehensive Income after taxes		**9.053.064**	**25.939.274**	**5.335.994**	**20.794.430**
Attributable to:					
Shareholders of the mother Company		9.053.064	25.939.274		
Non-controlling interests		-	-		
		9.053.064	**25.939.274**		

The accompanying notes form an integral part of these Annual Separate and Consolidated Financial Statements

D.3 Statements of Changes in Group's Equity

Amounts in EURO	Group SHAREHOLDER'S EQUITY								
	Share Capital	**Share Premium**	**Reserves**	**Reserves from the revaluation of fixed assets in fair value**	**F.X. Differences**	**Retained Earnings**	**Equity of the shareholders**	**Non-controlling interests**	**Total Equity**
Net Equity Balance on 01.01.2021	**18.336.000**	**13.296.000**	**12.688.604**	**14.686.242**	**100.438**	**(72.200.775)**	**(13.093.492)**	**0**	**(13.093.492)**
Profit/loss (-)	**0**	**0**	**0**	**0**	**0**	**25.620.131**	**25.620.131**	**0**	**25.620.131**
Other Comprehensive Income									
Revaluation of (losses)/gains from defined benefit plans	-	-	-	-	-	(32.924)	**(32.924)**	-	(32.924)
F.X. Differences	-	-	-	(43)	82.426	43	**82.426**	-	82.426
Related tax to Other Comprehensive Income	-	-	-	262.458	-	7.184	**269.642**	-	269.642
Other Comprehensive Income after taxes	**0**	**0**	**0**	**262.415**	**82.426**	**(25.697)**	**319.144**	0	**319.144**
Total Comprehensive Income after taxes	**-**	**-**	**-**	**262.415**	**82.426**	**25.594.434**	**25.939.274**	**-**	**25.939.274**
Net Equity Balance on 31.12.2021	**18.336.000**	**13.296.000**	**12.688.604**	**14.948.657**	**182.863**	**(46.606.342)**	**12.845.783**	**0**	**12.845.782**
Net Equity Balance on 01.01.2022	**18.336.000**	**13.296.000**	**12.688.604**	**14.948.657**	**182.863**	**(46.606.342)**	**12.845.783**	**0**	**12.845.782**
Share Capital Increase due to Merge	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Transactions with the owners	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Profit/loss (-)	**-**	**-**	**-**	**-**	**-**	**7.927.676**	**7.927.676**	**-**	**7.927.676**
Other Comprehensive Income									
Revaluation of assets in fair values	-	-	-	-	-	-	-	-	-
Interest Hedging (swap)	-	-	1.420.280	-	-	-	**1.420.280**	-	1.420.280
Revaluation of (losses)/gains from defined benefit plans	-	-	-	-	-	27.922	**27.922**	-	27.922
F.X. Differences	-	-	-	-	(4.165)	-	**(4.165)**	-	(4.165)
Related tax to Other Comprehensive Income	-	-	(340.867)	-	-	22.218	**(318.649)**	-	(318.649)
Other Comprehensive Income after taxes	**-**	**-**	**1.079.413**	**-**	**(4.165)**	**50.140**	**1.125.388**	**-**	**1.125.388**
Total Comprehensive Income after taxes	**0**	**0**	**1.079.413**	**0**	**(4.165)**	**7.977.816**	**9.053.064**	**0**	**9.053.064**
Capitalization of reserves	0	0	189.866	0	0	(189.866)	0	0	0
Tax reserves	0	0	0	0	0	(32.515)	**(32.515)**	0	(32.515)
Net Equity Balance on 31.12.2022	**18.336.000**	**13.296.000**	**13.957.882**	**14.948.657**	**178.699**	**(38.850.907)**	**21.866.332**	**0**	**21.866.332**

The accompanying notes form an integral part of these Annual Separate and Consolidated Financial Statements

SIDMA STEEL S.A.

D.4 Statements of Changes in Company's Equity

Amounts in EURO	Company				
	Share Capital	**Share Premium**	**Reserves**	**Retained Earnings**	**Total Equity**
Net Equity Balance on 01.01.2021	**18.336.000**	**13.296.000**	**23.060.222**	**(51.021.603)**	**3.670.619**
Profit/loss (-)	**-**	**-**	**-**	**20.557.266**	**20.557.266**
Other Comprehensive Income					
Revaluation of liabilities to Employees	-	-	-	(32.429)	(32.429)
F.X. Differences	-	-	(43)	-	(43)
Income taxes related to items of other comprehensive income	0	0	262.458	7.134	**269.593**
Other Comprehensive Income after taxes	**0**	**0**	**262.416**	**(25.294)**	**237.122**
Total Comprehensive Income after taxes	**0**	**0**	**262.416**	**20.531.972**	**20.794.388**
Net Equity Balance on 31.12.2021	**18.336.000**	**13.296.000**	**23.322.637**	**(30.489.630)**	**24.465.007**
	Share Capital	**Share Premium**	**Reserves**	**Retained Earnings**	**Total Equity**
Net Equity Balance on 01.01.2022	18.336.000	13.296.000	23.322.637	(30.489.630)	24.465.007
Transactions with the owners	**0**	**0**	**0**	**0**	**0**
Profit/loss (-)	**-**	**-**	**-**	**4.206.107**	**4.206.107**
Other Comprehensive Income					
Interest Hedging (swap)	-	-	1.420.280	-	1.420.280
Revaluation of liabilities to Employees	-	-	-	28.293	28.293
Income taxes related to items of other comprehensive income	-	-	(340.867)	22.181	(318.686)
Other Comprehensive Income after taxes	**-**	**-**	**1.079.413**	**50.474**	**1.129.887**
Total Comprehensive Income after taxes	**-**	**-**	**1.079.413**	**4.256.582**	**5.335.994**
Net Equity Balance on 31.12.2022	**18.336.000**	**13.296.000**	**24.402.050**	**(26.233.048)**	**29.801.002**

The accompanying notes form an integral part of these Annual Separate and Consolidated Financial Statements

SIDMA STEEL S.A.

D.5 Cash Flows Statements

SIDMA STEEL S.A.
Cash Flow Statement
for the period from 1st January to 31st December 2022

Amounts in EURO	Group		Company	
	1.1 - 31.12.2022	**1.1-31.12.2021**	**1.1 - 31.12.2022**	**1.1-31.12.2021**
Operating Activities				
Profit before taxation	9.797.595	31.717.903	5.811.383	26.361.346
Adjustments for:				
Depreciation & amortization	1.593.687	1.616.218	1.159.818	1.183.354
Depreciation of granted assets	(13.780)	(41.924)	(13.780)	-41.924
Provisions	64.391	622.913	36.540	618.543
Exchange Differences	(55.751)	(83.364)	-	-
Income and expenses from investing activities	(173.260)	962.187	(173.260)	962.381
Profit recognition income at fair value	-	(12.984.455)	-	(12.984.455)
Other non cash income/expenses	58.067	87.894	28.293	42
Finance Costs	6.671.331	7.488.170	5.958.957	6.501.033
Adjustments for changes in working capital				
Decrease/(increase) in inventories	(2.517.541)	(23.823.350)	(4.186.545)	(14.908.651)
Decrease/(increase) in receivables	(4.091.010)	(26.851.070)	(2.556.928)	(21.510.695)
(Decrease)/increase in payables(except bank loans and overdrafts)	(789.758)	17.908.136	(3.081.202)	13.461.613
Less:				
Financial Costs paid	(4.620.675)	(4.508.955)	(3.977.281)	(3.522.020)
Taxes paid	(4.484.543)	(79.288)	(4.226.006)	-
Total inflows / (outflows) from operating activities (a)	**1.438.752**	**(7.968.985)**	**(5.220.012)**	**(3.879.433)**
Investing activities				
Acquisition of subsidiaries	-	0	-	(7.765.900)
Purchase of tangible and intangible assets	(1.079.081)	(1.389.572)	(977.793)	(1.229.270)
Proceeds on disposal of tangible and intangible assets	700.000	11.499.993	700.000	11.499.993
Interest received	12.986	198	12.986	4
Total inflows / (outflows) from investing activities (b)	**(366.094)**	**10.110.619**	**(264.806)**	**2.504.827**
Financing Activities				
New bank loans raised	19.623	106.752.089	-	79.579.345
Repayments of loans	(4.993.554)	(112.705.410)	(4.033.419)	(82.344.622)
Repayments of financial leasing agreements	(341.446)	(206.086)	(155.097)	(177.768)
Total inflows / (outflows) from financing activities (c)	**(5.315.377)**	**(6.159.408)**	**(4.188.517)**	**(2.943.045)**
Net Increase/(Decrease) in cash and cash equivalents (a) + (b) + (c)	**(4.242.719)**	**(4.017.774)**	**(9.673.335)**	**(4.317.650)**
Cash and cash equivalents at the beginning of the period	12.724.447	16.742.221	11.430.821	15.748.471
Cash and cash equivalents at the end of the period	**8.481.728**	**12.724.447**	**1.757.486**	**11.430.821**

The accompanying notes form an integral part of these Annual Separate and Consolidated Financial Statements

1 General Information about the Company and the Group

The parent company, SIDMA STEEL S.A., is a Société Anonyme, which operates in processing and trading steel products in Greece. The company's headquarters are located at Aspropyrgos Branch (188 Megaridos str, Zip Code 19300), and its website is www.sidma.gr. The company is listed on the Athens Stock Exchange under the category of Basic Metals.

It also has branches in the following areas:
- Oreokastro (Oreokastro 57013)
- Lamia (VIPE Λαμίας ΟΤ 4Β, 35100)

Apart from the Company SIDMA STEEL S.A., the Consolidated Financial Statements for 2021 include the following companies:
- "SIDMA WORLDWIDE LIMITED" (100% subsidiary), a holding company domiciled in Cyprus, established in
- 100% subsidiaries "SIDMA Romania SRL" domiciled in Romania and "SIDMA Bulgaria S.A.», domiciled in Bulgaria, with the same objective purpose as that of the parent company through the Cyprian holding company "SIDMA WORLDWIDE LIMITED».

The financial statements of our subsidiary companies domiciled abroad, for the fiscal year 2021, have been uploaded in the following link: https://sidma.gr/el/oikonomikes-katastaseis-thygatrikon/

2 Framework for Preparing the Financial Statements

These financial statements include the Company's individual financial statements and the consolidated financial statements of the Group dated December 31, 2022, covering the period from January 1, 2022, to December 31, 2022. The financial statements have been prepared in accordance with the historical cost convention as modified by the revaluation of specific assets at fair value and under the going concern principle.

The financial statements have been prepared in accordance with the International Financial Reporting Standards (IFRS) as issued by the International Accounting Standards Board (IASB) and the Interpretations, as the Interpretations Committee (I.F.R.I.C.) of the IASB published these and approved by the European Union.

The preparation of the financial statements in accordance with the IFRS requires the use of certain significant accounting estimates. It also requires from the Management to exercise judgement on the process of applying the accounting principles. Areas that require a higher degree of judgement or are extremely complex, or areas where assumptions and estimates are important for the financial statements, are mentioned in the significant accounting estimates and judgements under note 5.

The presentation currency is the Euro (the currency of the country of the head office of the Group's parent company).

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3 Changes in Accounting Policies

Certain new standards, amendments to standards and interpretations have been issued, which are mandatory for accounting periods beginning during the current fiscal year or later. The Group's assessment of the impact of applying these new standards, amendments and interpretations is set out below.

3.1 New Standards, Interpretations, Revisions and Amendments to existing Standards that are effective and have been adopted by the European Union

The following new Standards, Interpretations, and amendments of IFRSs have been issued by the International Accounting Standards Board (IASB), are adopted by the European Union, and their application is mandatory from or after 01/01/2022.

- **Amendments to IFRS 3 "Business Combinations", IAS 16 "Property, Plant and Equipment", IAS 37 "Provisions, Contingent Liabilities and Contingent Assets" and "Annual Improvements 2018-2020" (effective for annual periods starting on or after 01/01/2022)**

In May 2020, the IASB issued a package of amendments which includes narrow-scope amendments to three Standards as well as the Board's Annual Improvements, which are changes that clarify the wording or correct minor consequences, oversights or conflicts between requirements in the Standards. More specifically:

- **Amendments to IFRS 3 Business Combinations** update a reference in IFRS 3 to the Conceptual Framework for Financial Reporting without changing the accounting requirements for business combinations.
- **Amendments to IAS 16 Property, Plant and Equipment** prohibit a company from deducting from the cost of property, plant and equipment amounts received from selling items produced while the company is preparing the asset for its intended use. Instead, a company will recognize such sales proceeds and related cost in profit or loss.
- **Amendments to IAS 37 Provisions, Contingent Liabilities and Contingent Assets** specify which costs a company includes when assessing whether a contract will be loss-making.
- **Annual Improvements 2018-2020** make minor amendments to IFRS 1 First-time Adoption of International Financial Reporting Standards, IFRS 9 Financial Instruments, IAS 41 Agriculture and the Illustrative Examples accompanying IFRS 16 Leases.

The amendments affect/ do not affect the consolidated/ separate Financial Statements.

3.2 New Standards, Interpretations, Revisions and Amendments to existing Standards that have not been applied yet or have not been adopted by the European Union

The following new Standards, Interpretations and amendments of IFRSs have been issued by the International Accounting Standards Board (IASB), but their application has not started yet or they have not been adopted by the European Union.

- **IFRS 17 "Insurance Contracts" (effective for annual periods starting on or after 01/01/2023)**

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In May 2017, the IASB issued a new Standard, IFRS 17, which replaces an interim Standard, IFRS 4. The aim of the project was to provide a single principle-based standard to account for all types of insurance contracts, including reinsurance contracts that an insurer holds. A single principle-based standard would enhance comparability of financial reporting among entities, jurisdictions and capital markets. IFRS 17 sets out the requirements that an entity should apply in reporting information about insurance contracts it issues and reinsurance contracts it holds. Furthermore, in June 2020, the IASB issued amendments, which do not affect the fundamental principles introduced when IFRS 17 has first been issued. The amendments are designed to reduce costs by simplifying some requirements in the Standard, make financial performance easier to explain, as well as ease transition by deferring the effective date of the Standard to 2023 and by providing additional relief to reduce the effort required when applying the Standard for the first time. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01.01.2023.

- **Amendments to IAS 1 "Presentation of Financial Statements" (effective for annual periods starting on or after 01/01/2023)**

In February 2021, the IASB issued narrow-scope amendments that pertain to accounting policy disclosures. The objective of these amendments is to improve accounting policy disclosures so that they provide more useful information to investors and other primary users of the financial statements. More specifically, companies are required to disclose their material accounting policy information rather than their significant accounting policies. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

- **Amendments to IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates" (effective for annual periods starting on or after 01/01/2023)**

In February 2021, the IASB issued narrow-scope amendments that they clarify how companies should distinguish changes in accounting policies from changes in accounting estimates. That distinction is important because changes in accounting estimates are applied prospectively only to future transactions and other future events, but changes in accounting policies are generally also applied retrospectively to past transactions and other past events. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

- **Amendments to IAS 12 "Income Taxes: Deferred Tax related to Assets and Liabilities arising from a Single Transaction" (effective for annual periods starting on or after 01/01/2023)**

In May 2021, the IASB issued targeted amendments to IAS 12 to specify how companies should account for deferred tax on transactions such as leases and decommissioning obligations – transactions for which companies recognize both an asset and a liability. In specified circumstances, companies are exempt from recognizing deferred tax when they recognize assets or liabilities for the first time. The amendments clarify that the exemption does not apply and that companies are required to recognize deferred tax on such transactions. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

- **Amendments to IFRS 17 "Insurance contracts: Initial Application of IFRS 17 and IFRS 9 – Comparative Information" (effective for annual periods starting on or after 01/01/2023)**

In December 2021, the IASB issued a narrow-scope amendment to the transition requirements in IFRS 17 to address an important issue related to temporary accounting mismatches between insurance contract liabilities and financial assets in the comparative information presented when applying IFRS 17 "Insurance Contracts" and IFRS 9 "Financial Instruments" for the first time. The amendment aims to improve the usefulness of comparative information for the users of the financial statements. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have been adopted by the European Union with effective date of 01/01/2023.

- **Amendments to IAS 1 "Classification of Liabilities as Current or Non-current" (effective for annual periods starting on or after 01/01/2024)**

In January 2020, the IASB issued amendments to IAS 1 that affect requirements for the presentation of liabilities. Specifically, they clarify one of the criteria for classifying a liability as non-current, the requirement for an entity to have the right to defer settlement of the liability for at least 12 months after the reporting period. The amendments include: (a) specifying that an entity's right to defer settlement must exist at the end of the reporting period; (b) clarifying that classification is unaffected by management's intentions or expectations about whether the entity will exercise its right to defer settlement; (c) clarifying how lending conditions affect classification; and (d) clarifying requirements for classifying liabilities an entity will or may settle by issuing its own equity instruments. Furthermore, in July 2020, the IASB issued an amendment to defer by one year the effective date of the initially issued amendment to IAS 1, in response to the Covid-19 pandemic. However, in October 2022, the IASB issued an additional amendment that aim to improve the information companies provide about long-term debt with covenants. IAS 1 requires a company to classify debt as non-current only if the company can avoid settling the debt in the 12 months after the reporting date. However, a company's ability to do so is often subject to complying with covenants. The amendments to IAS 1 specify that covenants to be complied with after the reporting date do not affect the classification of debt as current or non-current at the reporting date. Instead, the amendments require a company to disclose information about these covenants in the notes to the financial statements. The amendments are effective for annual reporting periods beginning on or after 1 January 2024, with early adoption permitted. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have not been adopted by the European Union.

- **Amendments to IFRS 16 "Leases: Lease Liability in a Sale and Leaseback" (effective for annual periods starting on or after 01/01/2024)**

In September 2022, the IASB issued narrow-scope amendments to IFRS 16 "Leases" which add to requirements explaining how a company accounts for a sale and leaseback after the date of the transaction. A sale and leaseback is a transaction for which a company sells an asset and leases that same asset back for a period of time from the new owner. IFRS 16 includes requirements on how to account for a sale and leaseback at the date the transaction takes place. However, IFRS 16 had not specified how to measure the transaction when reporting after that date. The issued amendments add to the sale and leaseback requirements in IFRS 16, thereby supporting the consistent application of the Accounting Standard. These amendments will not change the accounting for leases other than those arising in a sale and leaseback transaction. The Group will examine the impact of the above on its Financial Statements, though it is not expected to have any. The above have not been adopted by the European Union.

4 Summary of Accounting Policies

4.1 Consolidation of Subsidiaries

Subsidiaries are the companies in which SIDMA STEEL S.A. has power to exercise control over their operations. The subsidiaries are consolidated in full, starting from the date on which effective control is transferred to the Company and cease to be consolidated from the date on which control is transferred out of the Company. The purchase method of accounting is used to account for the acquisition of subsidiaries. The cost of an acquisition is measured as the sum of the fair values, at the date of exchange, of the assets given, liabilities incurred or assumed, and equity instruments issued by the Group, in exchange for control of the acquired plus any costs directly attributable to the acquisition. The acquired identifiable assets, liabilities and contingent liabilities are measured initially at their fair values at the acquisition date, irrespective of the extent of any non-controlling interests.

The difference between acquisition cost and fair value of liabilities and contingent liabilities of the subsidiary's acquired assets is recorded as goodwill. When acquisition cost is less than the fair value of the acquired assets, liabilities and contingent liabilities of the subsidiary acquired, the difference is directly posted to period results. SIDMA revalue its participation in subsidiaries in acquisition cost less any impairment that might take place.

Non-controlling interest reflects the portion of profit or loss and net assets attributable to equity interests that are not owned by the Group. Non-controlling interest is reported separately in the consolidated income statement as well as in the consolidated balance sheet separately from the Share capital and reserves. In case of purchase of non-controlling interest, the difference between the value of acquisition and the book value of the share of net assets acquired is recognized as goodwill.

As regards the purchases made by non-controlling shareholders, the difference between the price paid and the acquired relevant stake of the book value of the subsidiary’s owner’s equity is posted to owner's equity. Any gains or losses arising from the sale to non-controlling shareholders are also posted to owner’s equity. As regards the sales made to non-controlling shareholders, the difference between the amounts received and the relevant stake of non-controlling shareholders is also posted to owners’ equity.

All significant inter-company balances and transactions have been eliminated. Where necessary, accounting policies for subsidiaries have been revised to ensure consistency with the policies adopted by the Company.

The financial statements of the subsidiaries are prepared for the same reporting date with the parent company.

4.2 Conversion into Foreign Currency

The consolidated financial statements are presented in Euro, which is the functional currency and the Group’s reporting currency.

4.2.1 Transactions in Foreign Currency

Foreign currency transactions are converted into the functional currency by using the exchange rates applicable on the date when the said transactions were performed. The monetary assets and liabilities, which are denominated in foreign currency, are converted into the Group’s functional currency on the Statement of Financial Position reporting date using the prevailing exchange rate on that day. Any gains or losses due to translation differences that result from the settlement of such transactions during the period, as well as from the conversion of monetary assets denominated in foreign currency based on the prevailing exchange rates on the Statement of Financial Position reporting date, are recognized in the Income Statement.

4.2.2 Foreign Operations

The assets and liabilities in the financial statements, are converted into Euro by using the exchange rates applicable on the Statement of Financial Position reporting date. Revenues and expenses have been converted into the Group's reporting currency by using the average exchange rates prevailing during the financial year. Any differences arising from the said procedure have been debited / (credited) to the "FX translation reserve" account of the subsidiaries' while it's recognized in other income in the Statement of Comprehensive Income. Upon selling, elimination or derecognition of a foreign subsidiary the above FX translation reserve is transferred to the income statement of the period.

4.3 Property, plant, and equipment

Group's and Company's Land, Buildings and Machinery which are held for use in the production process or for administrative purposes are presented in their revalued amounts in the Consolidated and Separate Financial Statements respectively, which are their fair values at the date of the valuation less accumulated depreciation and any impairment losses. Revaluations are performed with sufficient regularity to ensure that the carrying amount does not differ materially from that, which would be determined using fair value at the end of each reporting period date. If an asset's carrying amount is increased because of a revaluation, the increase is recognized in Other Comprehensive Income and accumulated in equity as revaluation reserve. However, the increase is recognized in profit or loss to the extent that it reverses a revaluation decrease of the same asset previously recognized in profit or loss. If an asset's carrying amount is decreased because of a revaluation, the decrease is recognized in in profit or loss. However, the decease shall be recognized in Other Comprehensive Income to the extent of any credit balance existing in the revaluation surplus in respect of that asset. The decrease recognized in Other Comprehensive Income reduces the amount accumulated in equity as revaluation reserve.
Transportation and other vehicle are recognized in the financial statements at cost, less accumulated depreciation. The acquisition cost includes all direct costs stemming from the acquisition of the assets. Gain or losses from the sale of tangible assets are recognized in line" Profit/(Losses) from investing operations". Where the carrying amount of an asset is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount.
Depreciation is calculated on the straight-line method to write off the assets to their residual values over their estimated useful lives as follows:

Buildings (Offices & Warehouses)	26 - 45 years
Plants	5 - 14 years
Transportation means - vehicles	6 - 9 years
Other equipment	4 - 10 years

The assets' residual values and useful lives are reviewed, and adjusted if appropriate, at each balance sheet date.

4.4 Investment property

Investment property includes investments in all types of property, owned (through purchase or development) by the Group, either to earn rentals or for capital appreciation or both, rather than for: (a) use in the production or supply of goods or services or for administrative purposes; or (b) sale in the ordinary course of business.
An investment property is initially measured at its cost. Transaction costs are included in the initial measurement. An investment property is subsequently recognized at fair value. Fair value is determined

by independent appraisers, who possess sufficient experience in the issues regarding investment property location and nature.
The carrying amount recognized in the Group's Financial Statements reflects the market conditions as at the Statement of Financial Position reporting date. Gains or losses arising from changes in fair value of investment property constitute a result and are recognized in the income statement for the period when incurred. Repairs and maintenance expenses are recognized in the expense for the period when performed. Significant subsequent costs are capitalized when they increase the useful life of the property and its production capacity or when they reduce its operating costs.
Property is transferred from investment property category only when there is a change in its use, evidenced by the fact that the Group starts using it as owner-occupied property or by commencement of its development with a view to sale.
An investment property is derecognized (eliminated from the Statement of Financial Position) on disposal or when the investment property is permanently withdrawn from use and no future economic benefits are expected from its disposal.
Gains or losses arising from the retirement or disposal of investment are determined as the difference between the net disposal proceeds and the carrying amount of the asset and are recognized in the income statement in the period of the retirement or disposal.
Investment property, which is constructed or developed, as well as the completed investment property, is monitored at fair value.

4.5 Intangible assets

4.5.1 Goodwill

Goodwill represents the excess of the cost of an acquisition over the fair value of the Group's share of the net assets of the acquired subsidiary, joint venture and associate at the date of acquisition. Goodwill on acquisitions of subsidiaries and joint ventures are included in intangible assets. Goodwill on acquisitions of associates occurring is included in investments in associates. Goodwill is tested annually for impairment and carried at cost less accumulated impairment losses. Gains and losses on the disposal of an entity include the carrying amount of goodwill relating to the entity sold.
Goodwill is allocated to cash-generating units for the purpose of impairment testing. Each of those cash-generating units represents a separate Group's investment.

4.5.2 Computer software

Software licenses are stated at historical cost less subsequent depreciation. Depreciation is calculated on the straight-line method over their estimated useful lives which are 4-5 years.

4.6 Financial Instruments

A financial instrument is any contract that creates a financial asset in an enterprise and a financial liability or equity instrument in another enterprise.

4.6.1 Initial Recognition

A financial asset or a financial liability is recognized in the Balance Sheet of the Group when it arises or when the Group becomes part of the contractual terms of the instrument.
Financial assets are classified at initial recognition and subsequently measured at amortized cost, at fair value through other comprehensive income and at fair value through results.
The Group initially assesses financial assets at their fair value. Trade receivables (which do not contain a significant financial asset) are valued at transaction price.

For a financial asset to be classified and measured at amortized cost or at fair value through comprehensive income, cash flows should be derived which are exclusively capital and interest payments on the initial capital. The Group's business model for managing financial assets refers to the way in which it manages its financial capabilities to generate cash flows. The business model determines whether cash flows arise from the collection of contractual cash flows, the sale of financial assets or both. The purchase or sale of financial assets that require the delivery of assets within a time frame specified by a regulation or a contract is recognized on the trade date, i.e. on the date on which the Group commits to purchase or sell the asset.

4.6.2 Classification and Subsequent Measurement

For subsequent measurement, financial assets are classified in the following categories:

i. *Financial assets measured at fair value through results.*
Financial assets measured at fair value through results include financial assets held for trading purposes, financial assets designated at initial recognition at fair value through results or financial assets that are required to be measured at fair value. Financial assets are classified as held for trading if they are acquired to be sold or repurchased in the near future. Derivatives, including embedded derivatives, are also classified as held for trading, unless defined as effective hedging instruments. Financial assets with cash flows that are not only capital and interest payments are classified and measured at fair value through results, irrespective of the business model.

ii. *Financial assets at amortized cost*
The Group measures financial assets at amortized cost if both of the following conditions are met: (1) The financial asset is retained to hold financial assets for the collection of contractual cash flows; and (2) the contractual terms of the financial asset create cash flows on specified dates that constitute only capital and interest payments on the balance of the initial capital. Financial assets at amortized cost are then measured using the EIR method and are subject to impairment. Profits and losses are recognized in results when the asset is derecognized, modified, or impaired.

iii. *Financial assets classified at fair value through comprehensive income.*
Upon initial recognition, the Group may elect to irrevocably classify its equity investments as equity instruments that are designated at fair value through comprehensive income when they meet the definition of net position and are not held for trading. Classification is determined by financial instrument. Profits and losses from these financial assets are never recycled to profits or losses. Equity instruments designated at fair value through comprehensive income are not subject to an impairment test.

4.6.3 Derecognition

A financial asset is derecognized primarily when:

- The rights to receive cash flows from the asset have expired, or
- The Group has transferred its rights to receive cash flows from the asset or has undertaken to fully pay the cash flows received without significant delay to a third party under an agreement and either (a) it has substantially transferred all risks and rewards of the asset; or (b) it has not substantially transferred or held all the risks and estimates of the asset but has transferred the control of the asset.

4.6.4 Impairment

The Group recognizes a provision for loss against expected credit losses for all financial assets that are not measured at fair value through results. Expected credit losses are based on the difference between

all contractual cash flows that are payable and all discounted cash flows that the Group expects to receive.
For client and contractual assets, the Group applies the simplified approach for calculating the expected credit losses. Therefore, on each reporting date, a loss provision for a financial instrument is measured at an amount equal to the expected credit losses over the lifetime without monitoring the changes in credit risk.

4.7 Inventories

Inventories are stated at the lower of cost and net realizable value. Cost is determined using the weighted average method. The cost of finished goods and work in progress comprises raw materials, direct labor, other direct costs and related production overheads (based on normal operating capacity). It excludes borrowing costs. Net realizable value is the estimated selling price in the ordinary course of business, less applicable variable selling expenses.

4.8 Cash and cash equivalents

Cash, cash equivalents include cash in hand, sight deposits, time deposits, overdraft bank accounts, and other high liquidity investments that are directly convertible to specified amounts of cash that are subject to a material risk of change in value.
To prepare the consolidated statements of cash flows, cash is made up of cash and balances with banks as well as cash as stated above.

4.9 Share capital

Ordinary shares and non-redeemable non-voting preferred shares with minimum statutory nondiscretionary dividend features are classified as equity.
Incremental external costs directly attributable to the issue of new shares are shown in equity as a deduction, net of tax, from the proceeds.
Where the Company or its subsidiaries purchases the Company’s own equity share capital, the consideration paid including any attributable incremental external costs net of income taxes is deducted from total shareholders’ equity as treasury shares until they are cancelled. Where such shares are subsequently sold or reissued, any consideration received is included in shareholders’ equity.

4.10 Borrowings

Borrowings are recognized initially at fair value, net of transaction costs incurred. Borrowings are subsequently stated at amortized cost; any difference between the proceeds (net of transaction costs) and the redemption value is recognized in the income statement over the period of the borrowings using the effective interest method.

Borrowings are classified as current liabilities unless the Group has an unconditional right to defer settlement of the liability for at least 12 months after the balance sheet date. Long term borrowings that fall due within the next fiscal year are classified as short term.

4.11 Government grants

Government grants related to grants for assets are recognized at fair value when there is reasonable assurance that the grand will be received and that all the relevant conditions attached will be met.

These grants are recognized as deferred income, which is recognized in the profits or loss of each reporting period in equal instalments based on the useful life of the asset after deducting all related depreciation expenses.
Grants relating to expenses are recognized after deducting all the relevant expenses during the period required for their systematic correlation with subsidized expenses.

4.12 Taxation

Income tax includes the statutory tax, deferred taxation as well as provisions for any tax differences that may arise from a tax audit. Income tax is recognized in the P&L statement except the part of deferred tax of transactions carried directly to equity.
During the current year, no income tax has been calculated due to the losses registered by the companies of the Group.
Deferred tax assets are recognized to the extent it is probable that they will be offset against future income taxes. Deferred tax assets are reviewed on each balance sheet date and reduced to the extent it is no longer probable that adequate taxable profit will be available against which all or part of such deferred tax asset can be utilized.
Deferred tax liabilities are recognized for all taxable temporary differences. Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realized, or the liability is settled based on tax rates that have been enacted or substantively enacted by the balance sheet date.
Most changes in deferred tax assets or liabilities are recognized as tax expense in profit or loss. Only changes in deferred tax assets or liabilities relating to a change in the value of asset or liability directly debited to equity shall be debited or credited directly to equity.
The Group recognizes a previously unrecognized deferred tax asset to the extent it is probable that a future taxable profit will enable the recovery of the deferred tax asset.

4.13 Employee benefits

4.13.1 Short-term Benefits

Short-term benefits to personnel (except for termination of employment benefits) in cash and in kind are recognized as an expense when considered accrued.

4.13.2 Retirement Benefits

Benefits following termination of employment include lump-sum severance grants, pensions and other benefits paid to employees after termination of employment in exchange for their service.

Defined Benefit Plan (non- funded)
Under Laws 2112/20 and 4093/2012, the Company must pay compensation upon retirement or termination to its employees. The amount of compensation paid depends on the years of service, the level of wages and the way of leaving service (dismissal or retirement). The entitlement to participate in these plans is usually based on years of service of the employee until retirement.
The liability recognized in the Statement of financial Position for defined benefit plans is the present value of the liability for the defined benefit less the plan assets' fair value (reserve from payments to an insurance company), the changes deriving from any actuarial profit or loss and the service cost. The defined benefit commitment is calculated on an annual basis by an independent actuary through the use of the projected unit credit method.
A defined benefit plan establishes, based on various parameters, such as age, years of service, salary, the specific obligations for payable benefits. Provisions for the period are included in the relative staff

costs in the accompanying separate and consolidated Income Statements and comprise of the current and past service cost, the relative financial cost, the actuarial gains or losses and any possible additional charges. Regarding unrecognized actuarial gains or losses, the revised IAS 19 is applied, which includes several changes to accounting for defined benefit plans, including:

- recognition of actuarial gains / losses in other comprehensive income and their permanent exclusion from the income statement,
- non-recognition of the expected returns on the plan investment in the income statement but recognition of the relative interest on net liability / (asset) of the benefits calculated based on the discount rate used to measure the defined benefit obligation,
- recognition of past service cost in the income statement at the earliest between the plan modification date or when the relative restructuring or terminal provision,
- other changes include new disclosures, such as quantitative sensitivity analysis.

4.14 Provisions, Contingent Liabilities and Contingent Assets

The Group forms provisions when:

i. the group or the company has a present obligation (legal or constructive) as a result of a past event;
ii. it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation; and
iii. a reliable estimate can be made of the amount of the obligation.

If these conditions are not met, no provision shall be recognized.
Contingent liabilities and contingent assets are not recognized in the financial statements. Contingent assets are disclosed, where an inflow of economic benefits is probable while contingent liabilities are disclosed when the possibility of an outflow of resources embodying economic benefits, is high.

4.15 Revenue and Expenses recognition

Revenue and expenses are recognized in accordance with the principle of accrual basis.
Revenue comprises the fair value of the sale of goods and services, net of value-added tax, rebates and discounts and after eliminating sales within the Group. Revenue is recognized as follows.

4.15.1 Sales of goods – wholesale

Sales of goods are recognized when a Group entity has delivered products to the customer; the customer has accepted the products; and collectability of the related receivables is reasonably assured.

4.15.2 Services

Revenue from provision of services is accounted for in the period, in which the services are rendered, based on the stage of completion of the service provided in relation to all the services provided.

4.15.3 Revenue from electricity generation

Electricity sales are recognized on the date that the relevant risks are transferred to the buyer, and, according to the monthly electricity production provided to the Greek network and confirmed by the LAGHE (the operator of the Greek electricity market) and ADMHE (the independent power transmission operator). Revenue also includes the ancillary services received from ADMHE.

4.15.4 Interest income

Interest income is recognized on a time-proportion basis using the effective interest method.

4.15.5 Dividend income

Dividend income is recognized when the right to receive payment is established, that means when dividends are approved by the General Assembly of the Shareholders.

4.15.6 Expenses

Expenses are recognized in profit or loss on an accrual basis. Payments made for operating leases are transferred to the income statement as expenses when the lease is used. Interest expense is recognized on an accrual basis.

4.16 Leases

Leases where a significant portion of the risks and rewards of ownership are retained by the lessor are classified as operating leases. Payments made under operating leases (net of any incentives received from the lessor) are charged to the income statement on a straight-line basis over the Lease period. Where the Group has substantially all the risks and rewards of ownership, the leases are classified as finance leases. Finance leases are capitalized at the inception of the lease at the lower of the fair value of the leased property or the present value of the minimum lease payments. Each lease payment is allocated between the liability and finance charges to achieve a constant rate on the finance balance outstanding. The corresponding rental obligations, net of finance charges, are included in liabilities. The interest element of the finance cost is charged to the income statement over the lease period to produce a constant periodic rate of interest on the remaining balance of the liability for each period. Property, plant and equipment acquired under finance leases are depreciated over the shorter of the useful life of the asset or the lease term.

4.17 Dividends

The allotment of dividends and management fees (from the profits of each year) is recognized as a liability in the financial statements, only when the allotment is being approved by the General Assembly of the Shareholders.

5 Important accounting estimates and judgements of Management

The preparation of Financial Statements in accordance with the International Financial Reporting Standards (IFRS) requires the Management to make judgements, estimates and assumptions that affect the assets and liabilities, the notifications of contingent assets and liabilities, as well as income and expenses during the periods presented. Actual results may differ from those estimates. Estimates and judgements are based on historical experience and other factors, including expectations of future events that are considered reasonable under specific circumstances, while they are reassessed continuously based on all available information.
During the preparation of the financial statements, the significant accounting estimates and judgements adopted by the Management for the implementation of the Group's accounting principles are consistent with those applied in the annual financial statements of December 31, 2021, and mainly related to the following:

5.1 Provision for Income Tax

The provision for income tax based on IAS 12 is calculated by estimating the taxes payable to the tax authorities and includes the current income tax for each fiscal year and a provision for any additional taxes that may arise in tax audits.

The companies of the Group are subject to income taxes in different jurisdictions. For the overall evaluation of the provision for income taxes as shown in the Balance Sheet, significant assumptions are required. For specific transactions and calculations, the final tax determination is uncertain. The Group recognizes liabilities for anticipated tax audit issues based on estimates of whether additional taxes will come up. Where the final tax outcome of these issues is different from the amount that was originally recognized, the differences affect the provision for income tax and deferred tax in the period in which these were determined.

5.2 Deferred Tax Assets on Tax Losses

Deferred tax assets are recognized for all unused tax losses to the extent that it is possible to have sufficient taxable profits that will offset these tax losses. For determining the amount of deferred tax assets that can be recognized, the Group's Management must make significant judgements and estimates, based on future taxable profits together with future tax planning strategies that will be followed.

5.3 Provisions for Doubtful Debts

The Group makes provisions for doubtful debts in relation to specific customers, when there are data or evidence showing that the recovery of the relevant claim is not possible in whole or in part. The Group's Management periodically reassess the adequacy of the provision for doubtful debts in connection with its credit policy and considers data from the Legal Department of the Group, which arise from processing past data and recent developments in the cases handled.

5.4 Contingencies

The Group is involved in litigations and claims in the normal course of its operations. The Management reckons that any resulting settlements would not materially affect the financial position of the Group on December 31, 2021. However, the determination of contingent liabilities relating to litigations and claims is a complex process that involves judgements regarding the outcomes and the interpretation of laws and regulations. Changes in the judgements or interpretations may result in an increase or a decrease in the Group's contingent liabilities in the future.

5.5 Useful Life of Depreciable Assets

The Management examines the useful lives of depreciable assets at each annual reporting period. On December 31, 2021, the Management estimates that the useful lives represent the expected utility of the assets.

5.6 Goodwill Impairment tests

The Group carries out the relevant goodwill impairment testing arisen from a subsidiary at least on an annual basis and/or whenever there is indication of impairment, in accordance with the provisions of IAS 36. To determine whether there are reasons for impairment, the calculation of the value in present use and of the fair value less costs to sell the business unit is required. Usually, the methods of the present value of cash flows, the valuation based on indices of similar transactions or businesses traded in an active market and the stock price are used. For the application of these methods, the Management is required to use elements such as estimated future profitability of the subsidiary, business plans as well as market factors, such as interest rates etc.

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5.7 Subsidiary Impairment test

The Group conducts a related impairment test of investments in subsidiaries whenever there is evidence of impairment in accordance with IAS 36. To determine whether there are any reasons for impairment, it is necessary to calculate the use value and the fair value less costs to sell of each Cash Generation Unit (CGU). Recoverable amounts of CGUs have been determined for impairment testing purposes based on the calculation of their value in use, which requires estimates. To calculate the value in use, the estimated cash flows are discounted at their present value using a discount rate that reflects the risks associated with that CGU. The calculation uses cash forecasts based on business-approved business plans. These business plans and cash flow projections usually cover a five-year period. Cash flows, beyond the period in which provisions are available, projected at the estimated growth rates. The key assumptions used to determine the recoverable amount of the different CGUs are reported in note 8.3 of the financial statements.

5.8 Fair values and loan's interest rates

Under the loan restructuring agreement of the parent company described in Note 8.12, the resulting new loans were recognized at fair value at the date of initial recognition and are subsequently carried at amortized cost.
The fair value was calculated based on the assessment of the purchase interest rate for respective loans. The estimate was in the range between 7% and 8% and for reasons of conservatism the lower limit of 7% was used.
Two methodologies were used for the assessment, namely:

1) The risk-free interest rate (10-year German Bond), plus risk-risk premium - adjusted to the company's creditworthiness as it resulted from the use of tools of reputable rating agencies (S&P Capital Q).
2) The yield of negotiable corporate bonds with similar characteristics (duration, collateral and guarantees, financial position of the issuer, etc.)

6 Group's structure

The parent company and the subsidiaries included in the Consolidated Financial Statements, with the percentage of participation and the country located as of 31st December 2022, are presented in the following table:

Company	Direct % of participation	Indirect % of participation	Total percentage	Country	Consolidation Method	Activity Sectors
SIDMA STEEL S.A.	Mother	-	Mother	Greece	Full	
SIDMA WORLDWIDE LIMITED	100%	0%	100%	Cyprus	Full	HOLDING
SIDMA ROMANIA SRL.	0%	100%	100%	Romania	Full	STEEL SERVICE CENTER
SIDMA BULGARIA S.A	0%	100%	100%	Bulgaria	Full	STEEL SERVICE CENTER

The Consolidated Financial Statements of SIDMA STEEL S.A. Group are included under Equity Method, in the Consolidated Financial Statements of VIOHALCO S.A. group of companies, domiciled in Brussels. The percentage applied for the consolidation of the period 01/01/2022 – 31/12/2022 is calculated at 25.32%.

Also, the financial statements of the SIDMA STEEL S.A. Group are included, using the equity method, in the consolidated financial statements of "BITROS METALLURGIKI A.E.V.E." group based in Athens. The percentage with which the above financial statements are consolidated for the period 01.01.2022-31.12.2022 amounts to 25.00%.

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7 Operating Segments

In accordance with IFRS 8, reportable operating segments are identified based on the "management approach". This approach stipulates external segment reporting based on the Group's internal organizational and management structure and on key figures of internal financial reporting to the chief operating decision maker who, in the case of SIDMA Group, is the Chief Executive Officer that is responsible for measuring the business performance of the segments.
For management purposes, the Group is organized in into business units based on the nature of the product and services provided. SIDMA STEEL had identified two reportable profit generating segments, "Steel segment" and "Other".

	1.1 - 31.12.2022			1.1-31.12.2021		
Amounts in Euros	Steel	Other	Total	Steel	Other	Total
Sales to other companies	264.964.593	339.614	265.304.207	226.066.434	343.127	226.409.561
Total Sales	**264.964.593**	**339.614**	**265.304.207**	**226.066.434**	**343.127**	**226.409.561**
Operational Profits	**16.002.411**	**168.073**	**16.170.484**	**25.372.249**	**172.156**	**25.544.405**
Finance cost	9.023.972	0	9.023.972	7.135.870	0	7.135.870
Result from investing activities	0	0	0	(962.372)	0	(962.372)
Profit before taxation	9.629.522	168.073	9.797.595	31.545.746	172.156	31.717.903
Profit after taxation	7.749.922	177.754	7.927.676	25.449.124	171.006	25.620.131
Depreciation	1.438.771	154.915	1.593.687	1.419.379	154.915	1.574.294
EBITDA	**(322.988)**	**322.988**	**0**	**26.791.628**	**327.072**	**27.118.699**
Assets	161.847.032	2.284.422	164.131.454	158.679.124	2.422.077	161.101.201
Long-term & Short-term Liabilities	142.081.425	183.697	142.265.122	148.100.745	154.674	148.255.419

The analysis of the turnover in respect of domestic and foreign geographical operations is presented below:

Amounts in Euro	1.1 - 31.12.2022			1.1-31.12.2021		
Company	Greece	Abroad	Total	Greece	Abroad	Total
SIDMA S.A.	156.085.828	16.841.248	**172.927.076**	135.378.798	14.666.426	**150.045.224**
SIDMA BULGARIA	0	54.614.227	**54.614.227**	0	43.732.511	**43.732.511**
SIDMA ROMANIA	0	37.762.905	**37.762.905**	0	32.631.827	**32.631.827**
Total	**156.085.828**	**109.218.379**	**265.304.207**	**135.378.798**	**91.030.764**	**226.409.562**

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8 Financial Data Analysis

8.1 Property Plant and Equipment

Property, plant and equipment for the Group and the company as of December 31, 2022, are shown in the following tables:

	Group						
Tangible Assets	**Land**	**Buildings**	**Machinery**	**Transportation**	**Other equipment**	**Assets under construction**	**Grand Total**
Acquisition cost							
Acquisition cost or deemed cost 1.1.2021	**12.660.822**	**19.973.906**	**9.746.738**	**2.520.945**	**1.950.342**	**30.028**	**46.882.781**
Additions	17.378	9.270	179.041	248.019	28.953	924.643	**1.407.304**
Sales or Deletions	-	-	(66.924)	(6.872)	(75.551)	-	**(149.347)**
Transfers	-	62.993	90.632	-	187	(160.192)	**(6.380)**
Exchange differences	(31.993)	(38.123)	(14.087)	(884)	(84)	-	**(85.171)**
Acquisition cost or deemed cost 31.12.2021	**12.646.207**	**20.008.045**	**9.935.400**	**2.761.208**	**1.903.847**	**794.480**	**48.049.186**
Depreciation							
Accumulated Depreciation 01.01.2021	**-**	**(104.364)**	**-**	**(1.937.925)**	**(1.836.145)**	**-**	**(3.878.434)**
Depreciation of the year	-	(796.944)	(492.722)	(239.553)	(40.424)	-	**(1.569.644)**
Depreciation of sold or deleted assets	-	-	52.668	-	74.305	-	**126.973**
Accumulated Depreciation 31.12.2021	**0**	**(901.307)**	**(440.055)**	**(2.177.478)**	**(1.802.265)**	**0**	**(5.321.105)**
Net Book value in 31.12.2021	**12.646.207**	**19.106.738**	**9.495.345**	**583.730**	**101.583**	**794.480**	**42.728.082**
Acquisition cost							
Acquisition cost or deemed cost 1.1.2022	**12.646.207**	**20.008.045**	**9.935.400**	**2.761.208**	**1.903.847**	**794.480**	**48.049.186**
Additions	-	Κτίρια	Μηχ/γικός εξοπλισμός	Μεταφορικά μέσα	Λοιπός εξοπλισμός	Ακινητοποιήσεις υπό εκτέλεση	**0**
Sales or Deletions	-	-	-	-	-	-	**-**
Transfers	-	0	-499.280	-118.079	-68.417	-	**(685.775)**
Exchange differences	0	0	0	0	0	-	**0**
Acquisition cost or deemed cost 31.12.2022	**12.646.207**	**20.008.045**	**9.436.120**	**2.643.129**	**1.835.431**	**794.480**	**47.363.411**
Depreciation							
Accumulated Depreciation 01.01.2022	**-**	**(901.307)**	**(440.055)**	**(2.177.478)**	**(1.802.265)**	**-**	**(5.321.105)**
Depreciation of the year	-	-	-	-	-	-	**-**
Depreciation of sold or deleted assets	-	-810.892	-544.140	-219.356	-34.171	-	**-1.608.559**
Accumulated Depreciation 31.12.2022	**0**	**(1.712.199)**	**(984.195)**	**(2.396.834)**	**(1.836.436)**	**0**	**(6.929.664)**
Net Book value in 31.12.2022	**12.646.207**	**18.295.846**	**8.451.924**	**246.295**	**-1.005**	**794.480**	**40.433.747**

	Company						
Tangible Assets	**Land**	**Buildings**	**Machinery**	**Transportation**	**Other equipment**	**Assets under construction**	**Grand Total**
Acquisition cost							
Acquisition cost or deemed cost 1.1.2021	**7.922.000**	**15.038.420**	**8.274.469**	**2.100.999**	**1.722.459**	**30.028**	**35.088.374**
Additions	-	9.270	167.335	126.870	18.095	924.643	1.246.213
Sales or Deletions	-	-	(66.060)	(6.872)	(74.583)	-	(147.516)
Transfers	-	62.993	90.632	-	187	(160.192)	(6.380)
Acquisition cost or deemed cost 31.12.2021	**7.922.000**	**15.110.682**	**8.466.375**	**2.220.997**	**1.666.157**	**794.480**	**36.180.692**
Depreciation							
Accumulated Depreciation 01.01.2021	**-**	**0**	**0**	**(1.715.424)**	**(1.625.064)**	**-**	**(3.340.487)**
Depreciation of the year	-	(592.106)	(345.949)	(168.568)	(34.112)	-	**(1.140.735)**
Depreciation of sold or deleted assets	-	-	51.839	-	74.278	-	**126.117**
Accumulated Depreciation 31.12.2021	**-**	**(592.106)**	**(294.110)**	**(1.883.992)**	**(1.584.898)**	**-**	**(4.355.106)**
Net Book value in 31.12.2021	**7.922.000**	**14.518.576**	**8.172.265**	**337.005**	**81.259**	**794.480**	**31.825.586**
Acquisition cost							
Acquisition cost or deemed cost 1.1.2022	**7.922.000**	**15.110.682**	**8.466.375**	**2.220.997**	**1.666.157**	**794.480**	**36.180.692**
Additions	-	24.017	91.253	104.888	31.519	714.264	**965.940**
Sales or Deletions	-	-	(499.280)	(100.662)	(68.417)	-	**(668.359)**
Transfers	-	290.892	483.248	-	5.808	(782.549)	**(2.601)**
Acquisition cost or deemed cost 31.12.2022	**7.922.000**	**15.425.591**	**8.541.597**	**2.225.222**	**1.635.068**	**726.195**	**36.475.672**
Depreciation							
Accumulated Depreciation 01.01.2022	**-**	**(592.106)**	**(294.110)**	**(1.883.992)**	**(1.584.898)**	**-**	**(4.355.106)**
Depreciation of the year	-	(599.984)	(398.354)	(148.365)	(28.730)	-	**(1.175.432)**
Depreciation of sold or deleted assets	-	-	16.940	85.951	68.417	-	**171.308**
Accumulated Depreciation 31.12.2022	**0**	**(1.192.090)**	**(675.523)**	**(1.946.406)**	**(1.545.211)**	-	**(5.359.230)**
Book value in 31.12.2022	**7.922.000**	**14.233.501**	**7.866.073**	**278.817**	**89.856**	**726.195**	**31.116.442**

Land, buildings, and machinery are measured at their revalued value (revaluation method). Means of transport, other equipment and fixed assets under construction are stated at cost less accumulated depreciation. To secure the Group's and the Company's loans, there are mortgage foreclosures listed in note 8.30.2 below.

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8.2 Intangible Assets

The intangible assets for the Group and the Company are shown in the following tables:

	Group			Company
Amounts in €	**Goodwill**	**Software**	**Total**	**Software**
Acquisition cost				
Acquisition cost or deemed cost 1.1.2021	**419.115**	**1.650.892**	**2.070.007**	**1.493.837**
Additions	-	61.662	61.662	61.662
Exchange differences	-	(23)	(23)	-
Acquisition cost or deemed cost 31.12.2021	**419.115**	**1.712.530**	**2.131.645**	**1.555.498**
Depreciation				
Accumulated Depreciation 01.01.2021	**-**	**(1.566.488)**	**(1.566.488)**	**(1.414.233)**
Depreciation of the year	-	(42.057)	(42.057)	(38.101)
Accumulated Depreciation 31.12.2021	**0**	**(1.608.545)**	**(1.608.545)**	**(1.452.334)**
Net Book value in 31.12.2021	**419.115**	**103.985**	**523.100**	**103.164**
Acquisition cost				
Acquisition cost or deemed cost 1.1.2022	**419.115**	**1.712.530**	**2.131.645**	**1.555.498**
Additions	0	46.458	46.458	18.018
Exchange differences	0	1	1	0
Acquisition cost or deemed cost 31.12.2022	**419.115**	**1.758.989**	**2.178.104**	**1.573.516**
Depreciation				
Accumulated Depreciation 01.01.2022	**0**	**(1.608.545)**	**(1.608.545)**	**(1.452.334)**
Depreciation of the year	0	(39.365)	(39.365)	(38.658)
Accumulated Depreciation 31.12.2022	**0**	**(1.647.910)**	**(1.647.910)**	**(1.490.992)**
Net Book value in 31.12.2022	**419.115**	**111.080**	**530.195**	**82.524**

The goodwill arose from the acquisition of the subsidiary in Romania, which is considered as a cash-generating unit and consists of one operating sector (steel). The recoverable amount of the above cash-generating unit was defined according to the method of value in use.

Goodwill impairment test is conducted annually and when indicators of impairment appear. Under those circumstances the corresponding forecasts are taken into consideration.

At 31.12.2022, Group management performed an impairment test for the goodwill and no indicator for impairment arose. The recoverable amount 31.12.2022 was determined by the value in use calculated based on projected cash flows of the Group financial budgets approved by management covering a period of five years. The projected cash flows were calculated to reflect the operating segment's demand conditions. The provision for future income over the next five years was based on the ratio between the sector's expected sales and the company’s respective sales (this ratio determines the company’s market share).

The pre-tax rate used to discount projected cash flows is 9.9%, while the growth rate in perpetuity (after five years) used is 3.0% and EBITDA margin of 4.0% - 4.2%. The above percentages are based on estimates of the Group’s and are consistent with independent external information sources.

The calculation of the Value in Use is more sensitive to the assumptions below:
a) Gross profit margin before depreciation
b) Discount rate
c) Growth rate on perpetuity.

Gross profit margin before depreciation – The gross profit margins before depreciation are based on estimates during the budget 5-year period and converge to the gross margins achieved in the past before the outbreak of the crisis.

Discount rate – Discount rates reflect the assessment of risk current situation with respect to each cash flow generating unit. The discount rate was calculated based on the average percentage of the sector's weighted average cost of capital. This percentage was further adjusted to reflect the market assumptions about each risk of cash flow generating units for which the estimates of future cash flows have not been adjusted. The discount rate used in the impairment test incorporates the creditworthiness of Romania and Eurozone as a whole.

Growth rate on perpetuity – The growth rate is based on the Group's long-term prospects about the segment under review.

Sensitivity Analysis
Management is not currently aware of any other event or condition that would reasonably be expected to change any of the key assumptions on which the determination of the recoverable amount of the cash-generating units was based. Nevertheless, on 31.12.2022, the Group analysed the sensitivity of the recoverable amounts per cash-generating unit in relation to a change in the basic assumptions presented: (i) half a percentage point in the gross profit margin before depreciation (ii) a percentage point in the discount rate, (iii) half a percentage point in the growth rate in perpetuity. From the relevant analyses, no impairment emerged.

8.3 Investments in Subsidiaries

The Company participates 100% in the subsidiary SIDMA WORLDWIDE LIMITED. The value of the company SIDMA WORLDWIDE LIMITED on 31.12.2022 was as follows:

	Balance at the beginning of the year	Cumulative Impairment	Additions	Balance on 31.12.2022
SIDMA WORLWIDE LIMITED	24.769.787	(5.826.671)	-	18.943.116

The value of the participation in the subsidiary SIDMA WORLDWIDE LIMITED in the individual financial statements was as follows:

	Company	
	31.12.2021	31.12.2020
Balance at the beginning of the year	**18.943.116**	**11.175.716**
Profit/Loss from Impermeant test	0	7.767.400
Balance at the end of the year	**18.943.116**	**18.943.116**

The subsidiary SIDMA WORLDWIDE LIMITED in turn participates 100% in SIDMA BULGARIA and SIDMA ROMANIA.

The parent company in 2021, made a share capital increase, amounting to € 7.8m, to its subsidiary SIDMA WORLDWIDE LIMITED which in turn proceeded with an equal SCI to its subsidiary in Romania. Part of this increase, amounting to € 5.2 m, funded by a 10-year bond loan covered by National Bank of Greece.

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On 31.12.2022, impairment testing of subsidiaries was carried out and no amount to be impaired arose. For impairment testing, the recoverable amount was determined based on the Valuation performed according to the business plans of the Group approved by the Management, covering a period of five years. The discount rate used to discount the expected cash flows is 9.6% for SIDMA BULGARIA S.A. and 9.9% for SIDMA ROMANIA SRL, while the growth rate on perpetuity (following the lapse of 5 years) was 3.0% for SIDMA BULGARIA S.A. and 3.0% for SIDMA ROMANIA SRL, considering the Group's long-term prospects and the economies of the countries in which the above companies operate. Regarding EBITDA margin, 3.5%-4.3% for SIDMA BULGARIA S.A and 4.0%-4.2% for SIDMA ROMANIA SRL was used respectively.

The calculation of the Value in Use is more sensitive to the assumptions below:
a) Gross profit margin before depreciation
b) Discount rate
c) Growth rate on perpetuity.

Gross profit margin before depreciation – The gross profit margins before depreciation are based on estimates during the budget 5-year period and converge to the gross margins achieved in the past before the outbreak of the crisis.

Discount rate – Discount rates reflect the assessment of risk current situation with respect to each cash flow generating unit. The discount rate was calculated based on the average percentage of the sector's weighted average cost of capital. This percentage was further adjusted to reflect the market assumptions about each risk of cash flow generating units for which the estimates of future cash flows have not been adjusted. The discount rate used in the impairment test incorporates the creditworthiness of Romania and Eurozone as a whole.

Growth rate on perpetuity – The growth rate is based on the Group's long-term prospects about the segment under review.

Sensitivity Analysis
Management is not currently aware of any other event or condition that would reasonably be expected to change any of the key assumptions on which the determination of the recoverable amount of the cash-generating units was based. Nevertheless, on 31.12.2022, the Group analysed the sensitivity of the recoverable amounts per cash-generating unit in relation to a change in the basic assumptions presented: (i) half a percentage point in the gross profit margin before depreciation (ii) a percentage point in the discount rate, (iii) half a percentage point in the growth rate in perpetuity. From the relevant analyses, no impairment emerged.

8.4 Other non-current assets

The other non-current assets are analysed in the table below:

	Group		Company	
Amounts in Euros	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Non-current assets (guarantees)	169.470	73.953	160.640	69.108
Other	1.000	1.000	1.000	1.000
Total	**170.470**	**74.953**	**161.640**	**70.108**

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8.5 Inventories

	Group		Company	
Amounts in Euros	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Merchandise	13.067.476	8.392.648	11.555.847	7.238.117
Finished and semi-finished products	8.158.729	5.755.807	6.251.573	4.317.250
Raw, auxiliary materials and spare parts	21.371.459	20.639.200	13.594.969	16.884.105
Payments in advances to suppliers	2.015.079	7.307.547	1.223.628	0
Total	**44.612.742**	**42.095.202**	**32.626.018**	**28.439.472**

Steel accounts for 85% of the parent Company's inventory and over 90% of its subsidiaries' inventory. The increase in the inventory of both - the Company and the Group - arose primarily from the increase in the average price of the end inventory by 21% compared to that of 2021 due to the increase in the price of steel worldwide.

To secure the Group's and Company's loans, there is a floating collateral on stocks as mentioned in paragraph 8.30.2 below.

8.6 Trade and Other Receivables

The Group's and Company's receivables and other trade receivables are analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Customers	32.177.136	30.695.585	24.558.032	24.277.353
Notes receivable	1.211.965	1.164.622	22.397	0
Cheques receivable	24.412.041	24.629.528	24.286.288	24.473.955
Less: Allowances for doubtful trade receivables	-1.459.020	-1.552.554	-915.797	-924.711
Total	**56.342.123**	**54.937.180**	**47.950.920**	**47.826.597**

The claims of the Company and the Group reflect the sales of the last three months of the year during which the sales prices were approximately 10% lower than the corresponding ones of 2021.

The account "Allowances for doubtful trade receivables" is analysed below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Balance at the beginning of the year	1.552.554	1.313.410	924.710	674.710
Deletion of doubtful clients/debtors	(8.914)	0	(8.914)	0
Provisions for doubtful receivables	(84.620)	250.000	0	250.000
FX differences	0	(10.856)	0	0
Balance at the end of the year	**1.459.020**	**1.552.555**	**915.796**	**924.710**

The Company has established criteria for providing credit to customers which are generally based on the size of the customer's activities, the financial situation as well as the assessment of relevant financial information. In addition, liquidity management is achieved by combining approved factoring with and without recourse. It is worth noting that on 31.12.2022 the Company makes use of a series of financing contracts through factoring without recourse, the limit of which amounts to approximately € 32 million.

In every Statement of Financial Position date, all overdue or doubtful receivables are assessed to determine whether provision for doubtful receivables is required. Any customers balance write-off burdens the existing provision for doubtful receivables.

Fair values of receivables approximately coincide with the book values.
Time presentation of the Group's and the Company's trade receivables is as follows:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Non-due trade receivables	43.729.749	46.417.584	35.675.729	39.498.253
Overdue and non-impaired receivables				
<90 days	10.898.869	7.362.670	10.743.171	7.305.692
<91 - 180 days	1.196.999	812.137	1.123.040	776.284
<181 - 360 days	397.079	167.260	289.554	68.840
> 360 days	357.384	415.486	357.384	415.486
Estimated credit losses	(237.957)	(237.957)	(237.957)	(237.957)
Total	**56.342.123**	**54.937.180**	**47.950.921**	**47.826.598**

Balances up to 120 days from the invoice date are considered as non-matured.

8.7 Other Receivables

The Other receivables of the Group and the Company are analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Sundry debtors	916.590	1.519.168	642.128	1.028.047
Receivables from the State (taxes, etc)	2.897.727	44.193	2.424.264	10.804
Purchases in transit	6.715.829	6.334.153	6.715.829	6.334.153
Blocked deposits	-	31.684	-	-
Deferred expenses	112.603	89.037	89.768	66.380
Total	**10.642.749**	**8.018.234**	**9.871.989**	**7.439.384**

The change in receivables from the Greek State represents the advance payment of income tax for the year 2021 which the Company formed in the year 2022 after a series of loss-making years.

8.8 Derivatives

The derivative financial instruments of the Company and the Group are measured at their fair value and concern "Hedging of Interest Rate Risk (swap)".

Specifically, given the gradual increase in inflationary pressures since the middle of the previous year, the Group proceeded with two interest rate risk management transactions amounting to €10 million with the National Bank of Greece and Piraeus Bank respectively. Specifically, it bought two interest rate swaps (Interest Rate CAPs) amounting to €5 million each at a maximum protection rate 0.5%. As a result, 10% of Group's Debt 12.5% of company's debt is "locked" at an interest rate of max 0.5%.

8.9 Cash and Cash Equivalents

The cash and cash equivalents of the Group and the Company are analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Cash on hand	20.384	37.806	6.798	2.454
Short-term deposits	8.461.344	12.686.642	1.750.689	11.428.367
Total	**8.481.728**	**12.724.447**	**1.757.487**	**11.430.821**

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Short-term bank deposits consist of cash and restricted deposits with initial maturity of 3 months or less. The carrying amount of cash and cash equivalents approximate their fair value. The Group uses these accounts to cover its short-term liabilities.

The significant decrease in the Company's and the Group's cash balances came primarily from the repayment of approximately € 4 million loan obligations of the parent Company and from the negative operating cash flows of the parent Company amounting to € 5.2 million. However, the working capital of the Company and the Group on 31.12.2022, excluding short term debt, reached the same levels as on 31.12.2021 and this decrease in reserves represents the repayment of commercial liabilities of the parent Company due to available liquidity throughout the year and an effort to enter more favorable terms commercial contracts.

8.10 Share Capital and Share Premium

The Share Capital of the Company amounts to the total amount of € 18,336,000 divided into 13,582,223 registered common shares, with a nominal value of € 1.35 each. There was no change during the fiscal year.

8.11 Reserves

The breakdown of the capital reserves is as follows:

	Group						
	Legal Reserve	Extraordinary Reserves	Special Reserves	Tax-free reserves under special laws	Difference from the revaluation of assets in fair values	FX differences from the consolidation of associates	Total
Balance in 1.1.2021	**2.518.248**	**239.720**	**866.370**	**9.064.267**	**14.686.244**	**100.434**	**27.475.282**
Changes during the current year	-	-	-	-	262.416	82.426	344.841,59
Balance in 31.12.2021	**2.518.248**	**239.720**	**866.370**	**9.064.267**	**14.948.660**	**182.859**	**27.820.123**
Changes during the current year	189.866	0	1.079.413	0	0	(4.165)	**1.265.114**
Balance in 31.12.2022	**2.708.114**	**239.720**	**1.945.782**	**9.064.267**	**14.948.660**	**178.695**	**29.085.238**

	Company					
	Legal Reserve	Extraordinary Reserves	Special Reserves	Tax-free reserves under special laws	Difference from the revaluation of assets	Total
Balance in 1.1.2021	**2.518.248**	**239.720**	**866.379**	**9.064.267**	**10.371.609**	**23.060.222**
Changes during the current year	-	-	-	-	262.416	**262.416**
Balance in 31.12.2021	**2.518.248**	**239.720**	**866.379**	**9.064.267**	**10.634.024**	**23.322.638**
Changes during the current year	-	-	1.079.413	-	-	**1.079.413**
Balance in 31.12.2022	**2.518.248**	**239.720**	**1.945.792**	**9.064.267**	**10.634.024**	**24.402.050**

8.12 Loans

The borrowings of the Group and of the Company are as follows:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Long-term loan liabilities				
Bond loans	64.791.479	68.997.368	64.266.977	67.870.920
Long-term bank loans	5.981.957	12.667.230	0	649.998
Leasing liabilities (long-term)	419.426	280.185	193.058	165.144
Less: Current installments of long-term loans	(4.128.504)	(4.949.281)	(3.604.002)	(3.822.833)
Less: Difference in the initial recognition of the fair value of new loans due to restructuring	(11.403.384)	(12.983.085)	(11.403.384)	(12.983.085)
Total long-term liabilities (a)	**55.660.973**	**64.012.417**	**49.452.649**	**51.880.144**
Short-term loan liabilities				
Short-term bank loans	4.840.594	793.793	425.000	-
Leasing liabilities (short-term)	260.508	236.294	123.837	139.579
Financing through factoring	14.189.639	12.378.199	12.331.469	12.378.199
Total short-term liabilities (b)	**19.290.741**	**13.408.286**	**12.880.305**	**12.517.778**
Plus: Current installments of long-term loans (c)	4.128.504	4.949.281	3.604.002	3.822.833
Grand Total (a)+(b)+(c)	**79.080.218**	**82.369.984**	**65.936.956**	**68.220.755**

The Company's bond loans as at 31.12.2021 amount to € 67.9 million of an initial contractual value of € 82 million and are analyzed as follows:

i. Secured CBL according to the provisions of Law 4548/2018 amounting amounting to € 44,635,000 (TRANCHE A'), covered by "National Bank of Greece SA", "EUROBANK SA", "ALPHA BANK SOCIETE ANONYME" and" Piraeus Bank SA " as initial bondholders, while the "National Bank of Greece SA" was appointed as representative of the bondholders.
ii. Secured CBL, according to the provisions of Law 4548/2018, amounting to € 7,177,000 (TRANCHE B'), covered by banks "National Bank of Greece SA" and "EUROBANK SA" as initial bondholders while the "National Bank of Greece SA" was appointed as representative of the bondholders.
iii. Secured CBL, according to the provisions of Law 4548/2018, amounting to € 24,980,000 (SERIES C'), covered by banks "National Bank of Greece SA", "EUROBANK SA"," ALPHA BANK SOCIETE ANONYME "and" ATTICA BANK SA " as initial bondholders while the "National Bank of Greece SA" was appointed as representative of the bondholders.

On February 5, 2021, the aforementioned common bond loans (CBL) were disbursed to refinance the existing loan obligations of the Company. The loans mature in 10 years, during which 50% of their nominal value will be repaid every year in two semi-annual installments.

The common bond loans were recognized at fair value, estimated by the Management, using the market interest rate of 7%, as described in Note 5.8.

The balance between the nominal amount at the initial recognition of the new loans and their fair value is included in the financial income (Note 8.24).

iv. Secured CBL, according to the provisions of Law 4548/2018 and Article 14 of Law 3156/2003, amounting to € 5,237,400, covered by the National Bank of Greece SA in the context of covering the share capital increase of the subsidiary SIDMA ROMANIA SRL to restructure the loans of the latter.

The movement of loan obligations for the Group and the Company, as of 12.31.2022 and 12.31.2021, is provided on the following table:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Opening Balance	82.369.984	115.151.545	68.220.755	94.930.268
Loans taken	19.623	106.752.089	-	79.579.345
Loans paid	(4.993.554)	(112.911.497)	(4.033.419)	(82.522.390)
Effect of Initial recognition of restructured loans at fair value	1.579.701	(12.983.085)	1.579.701	(12.983.085)
Non-cash Movements	104.464	(13.639.068)	169.919	(10.783.383)
Total	**79.080.218**	**82.369.984**	**65.936.956**	**68.220.755**

In respect of the total borrowing (long-term and short-term loans), the table below presents the future repayments for the Group and the Company as at 31.12.2022 and 31.12.2021:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Up to 1 year	24.968.864	21.523.503	18.033.926	17.920.661
Between 1 and 5 years	15.406.264	30.681.668	13.698.439	21.750.824
More than 5 years	50.108.475	43.147.899	45.607.975	41.532.356
Total	**90.483.603**	**95.353.069**	**77.340.341**	**81.203.841**
Discounting of loan obligations under IFRS 9	-11.403.384	-12.983.085	-11.403.384	-12.983.085
Total	**79.080.218**	**82.369.984**	**65.936.956**	**68.220.756**

At the meeting of the Company's Board of Directors held on 14 September 2021, it was decided to provide a special approval of Articles 99 & 101 of Law 4548/2018 for the sale of the investment property of Oinofyta to the associate ELVALHALCOR SA. The transfer was completed on 13 December 2021 and the consideration amounting to € 11,500.00 was paid to the bondholders of CBL amounting to € 44,635.00, as a prepayment against the last installment (€ 18,371,000) of Tranche A Bonds.

As at 31.12.2022 the Group had no foreign currency loans.

The average borrowing cost for both the Company and the Group amounted to 3.5% based on the contractual interest rate and at a rate of 7.5% and 7.0% for the Company and the Group respectively based on the effective borrowing rate.

The Group has a regular policy not to use all its available credit lines to have available credit lines or cash available any time at least 7.5% of the total. The Company's financial statements have been prepared under the going concern principle.

Real estate mortgage, floating insurance on a group of inventories and guarantees (postdated checks and customer invoices) mentioned in notes 8.30.1 and 8.30.2 below are held to secure the Group's and the Company's loans.

8.13 Government Grants

Government Grants relate to grants received from the parent Company and are analyzed below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Grants	12.462	26.242	12.462	26.242
Total	**12.462**	**26.242**	**12.462**	**26.242**

Depreciated Government Grants amounted to € 13,780 in 2022 and € 41,924 in 2021.

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8.14 Deferred Tax

The Group has chosen to set off the deferred tax assets against the deferred tax liability of the same taxable entity if, and only if, they relate to income taxes levied by the same taxation authority and the entity has a legally enforceable right to do so.

Deferred taxes of the Group and the Company are reviewed in each financial year so that the balance set out in the balance sheet is reflected at the applicable tax rates.

The tax rate of public limited companies in Greece for the fiscal year ended 31.12.2022 is 22%.

	Group						
	Fixed Assets	Investments	Retirement Benefits to personnel	Provision for doubtful debtors	Loans	other provisions	Total
01.01.2021	**(6.019.601)**	**140.037**	**155.151**	**1.424.488**	**-**	**672**	**(4.299.253)**
(Credit)/Debit of profit - loss statement	605.886	1.160	32.832	(847.090)	(2.793.557)	44.000	**(2.956.769)**
Effect from the change of tax rate in the P&L	196.145	(11.903)	(13.494)	(87.267)	-	-	**83.481**
(Credit)/Debit of Comprehensive Income	-	7.134	-	-	-	-	**7.134**
Effect from the change of tax rate in the O.C.I	262.458	-	-	-	-	-	**262.458**
31.12.2021	**(4.955.112)**	**136.429**	**174.489**	**490.131**	**(2.793.557)**	**44.672**	**(6.902.949)**
01.01.2022	**(4.955.112)**	**136.429**	**174.489**	**490.131**	**(2.793.557)**	**44.672**	**(6.902.949)**
(Credit)/Debit of profit - loss statement	191.244	8.039	-	(301.950)	(32.595)	-	**(135.261)**
(Credit)/Debit of Comprehensive Income	-	6.224	-	-	-	-	**6.224**
31.12.2022	**(4.763.869)**	**150.692**	**174.489**	**188.181**	**(2.826.152)**	**44.672**	**(7.031.986)**

	Company						
	Fixed Assets	Investments	Retirement Benefits to personnel	Provision for doubtful debtors	Loans	other provisions	Total
01.01.2021	**(5.503.237)**	**142.839**	**161.930**	**1.047.200**	**-**	**-**	**(4.151.268)**
Adjustments due to absorption of subsidiary company	508.481	1.160	32.832	(657.952)	(2.793.557)	44.000	**(2.865.035)**
(Credit)/Debit of profit - loss statement	196.145	(11.903)	(13.494)	(87.267)	-	-	**83.481**
Effect from the change of tax rate in the P&L	-	7.134	-	-	-	-	**7.134**
(Credit)/Debit of Comprehensive Income	262.458	-	-	-	-	-	**262.458**
31.12.2021	**(4.536.153)**	**139.230**	**181.268**	**301.982**	**(2.793.557)**	**44.000**	**(6.663.230)**
01.01.2022	**(4.536.153)**	**139.230**	**181.268**	**301.982**	**(2.793.557)**	**44.000**	**(6.663.230)**
(Credit)/Debit of profit - loss statement	191.255	8.039	- -	301.982	- 32.595	-	**(135.282)**
(Credit)/Debit of Comprehensive Income	-	6.224	-	-	-	-	**6.224**
31.12.2022	**(4.344.898)**	**153.494**	**181.268**	**0**	**(2.826.152)**	**44.000**	**(6.792.288)**

8.15 Pension's obligations

The change in the present value of the liability for defined benefit plans is as follows:

	Group		Company	
Defined Benefit	31.12.2022	31.12.2021	31.12.2022	31.12.2021
DBO at start of period	**638.503**	**631.129**	**632.866**	**595.162**
Service Cost	69.239	28.198	67.594	59.055
Interest Cost	4.788	5.390	4.746	5.359
Settlement/Termination loss/(gain)	16.683	99.098	16.683	99.098
Past service cost arising over the period	178	10.720	178	10.720
Benefits paid directly by the companies	(24.369)	(168.957)	(24.369)	(168.957)
Actuarial (gain)/loss- financial assumptions	(70.485)	5.057	(70.856)	4.562
Actuarial (gain)/loss - other assumptions	42.564	27.868	42.564	27.868
DBO at end of period	**677.101**	**638.503**	**669.407**	**632.866**

The amounts recognized in the Income Statement are:

	Group		Company	
Amounts recognized in P & L Statement	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Service Cost	69.239	28.198	67.594	59.055
Interest Cost	4.788	5.390	4.746	5.359
Settlement/Termination loss/(gain)	16.683	99.098	16.683	99.098
Past service cost arising over the period	178	10.720	178	10.720
Total P & L Charge	**90.888**	**143.407**	**89.201**	**174.232**

The amounts recognized in other comprehensive income in the Statement of Other Comprehensive Income are:

	Group		Company	
Amounts recognized in OCI	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Actuarial (gain)/loss- financial assumptions	70.485	(5.057)	70.856	(4.562)
Actuarial (gain)/loss - other assumptions	(42.564)	(27.868)	(42.564)	(27.868)
Total amount recognized in OCI	**27.921**	**(32.924)**	**28.292**	**(32.429)**

For determination of the pension liability, the following actual assumptions were used:

	Group		Company	
Assumptions	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Discount Rate	3,53%	0,75%	3,53%	0,75%
Rate of compensation increase	1,0%	1,0%	1,0%	1,0%

The amount of the obligation is particularly sensitive to the assumptions used, and especially in cases of compensation increase and the discount rate. A sensitivity analysis of such changes is shown below:

31.12.2022	Group		Company	
Discount Rate	+ 1%	- 1%	+ 1%	- 1%
Benefit Obligation	674.830	679.389	667.162	671.669

31.12.2022	Group		Company	
Future price inflation	+ 1%	- 1%	+ 1%	- 1%
Benefit Obligation	679.618	674.598	671.895	666.932

8.16 Trade and other payables

Trade suppliers and other liabilities of the Group and the Company are as follows:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Trade Suppliers	49.067.150	49.642.947	35.071.059	38.136.132
Total	**49.067.150**	**49.642.947**	**35.071.059**	**38.136.132**

The company's trade payables to its suppliers reflect imports of the last two months of the year, a period during which the import prices of raw materials were 10% lower than the corresponding ones in 2021.

Specifically, the weighted average repayment days of the suppliers amounted to 63 days from 69 days in the corresponding period of last year.

8.17 Other Current Liabilities

Other liabilities of the Group and the Company are as follows:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Advances from trade debtors	43.159	881.515	0	876.335
Social Security	256.051	247.324	256.051	247.324
Dividends payable	0	0	0	0
Sundry debtors	1.139.838	2.246.703	1.137.436	2.244.301
Accrued Expenses	1.146.019	1.353.923	1.093.945	1.316.774
Other short-term liabilities	147.630	551.802	0	158.625
Other (accruals or deffered income)	442.149	248.361	9.521	68.091
Total	**3.174.845**	**5.529.628**	**2.496.953**	**4.911.450**

8.18 Turnover (Sales)

Sales are analysed by category of products and services as follows:

	1.1 - 31.12.2022		1.1-31.12.2021	
	Group	Company	Group	Company
Manufacture of basic iron, steel and ferro-alloys	124.033.526	84.457.805	109.074.372	71.443.154
Wholesale of metals and metal ores	103.801.990	51.096.025	82.820.274	44.109.982
Manufacture of metal structures and parts of structures	17.426.896	17.426.896	18.379.853	18.379.853
Treatment and coating of metals	13.297.344	13.297.344	11.567.350	11.567.350
Prodution of Electricity	339.614	339.614	343.127	343.127
Manufacture of steel tubes	6.404.837	6.404.837	4.224.585	4.224.585
Σύνολο	**265.304.207**	**173.022.520**	**226.409.561**	**150.068.051**

The increase in the turnover of the parent company as well as the biggest part of the increase in the turnover of the subsidiaries is mainly due to the increase in metal prices.

The turnover amounts as appeared in the Statement of Comprehensive Income, do not include the sales made by the parent company on behalf of third parties (consignment) amounting to € 48,744,515. The respective amount of the previous year 2021 was € 47,448,764. The above amounts should be considered for the calculation of any ratios based on the turnover of the Group and the Company.

8.19 Cost of Sales

The Group's and Company's Cost of Sales is analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Cost of Goods	234.162.033	186.566.258	149.273.305	119.385.184
Devaluation of stock	0	200.000	0	200.000
Payroll & Related Expenses	1.670.211	1.510.009	1.419.619	1.308.690
Third Party Fees & Related Expenses	1.802.770	1.700.803	1.728.749	1.628.360
Utilities - Services	891.460	755.352	799.558	678.865
Taxes - Stamp Duties	20.082	19.371	5.192	6.339
Various Expenses	337.782	301.762	218.869	202.230
Depreciation	682.771	692.326	536.477	544.479
Total	**239.567.107**	**191.745.882**	**153.981.768**	**123.954.147**

The increase in both the Company's and the Group's inventory acquisition costs was primarily due to the increase in the average purchase price of metal prices worldwide. Quantities decreased marginally.

8.20 Other Income

The Other Income for the Group and the Company is analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Income from rendering services to third parties	1.003.408	769.584	1.003.408	769.584
Agency Fees	3.116.418	2.823.580	2.251.136	2.207.362
Rentals	8.160	283.751	8.160	283.751
Invoiced expenses for dispatching goods	1.482.766	1.820.384	1.222.574	1.202.606
Incidental activity income	220.403	214.378	0	0
Prior year's income	130.423	27.331	107.479	22.794
Depreciation of granted assets	13.780	41.924	13.780	41.924
Other extraordinary income	1.184.548	359.829	625.839	359.829
Total	**7.159.905**	**6.340.761**	**5.232.376**	**4.887.851**

8.21 Administrative expenses

The administrative expenses of the Group and the Company are analysed in the following table:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Payroll & Related Expenses	2.071.489	1.924.089	1.418.409	1.282.015
Third Party Fees & Related Expenses	703.264	924.507	630.038	700.619
Utilities - Services	307.257	222.990	140.154	123.274
Taxes - Stamp Duties	237.696	347.203	204.183	313.361
Various Expenses	352.519	282.987	118.467	99.375
Depreciation	245.414	312.520	205.047	269.498
Provisions	84.456	163.795	84.456	168.872
Total	**4.002.095**	**4.178.091**	**2.800.753**	**2.957.014**

8.22 Selling/Distribution expenses

The Selling and Distribution expenses of the Group and the Company are analysed in the following table:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Payroll & Related Expenses	4.533.669	4.141.813	3.034.753	2.965.862
Third Party Fees & Related Expenses	1.393.084	1.220.520	668.023	614.367
Utilities - Services	1.221.944	1.069.727	1.174.060	1.034.627
Taxes - Stamp Duties	45.253	96.438	37.552	89.203
Various Expenses	4.752.803	3.821.847	4.517.456	3.639.965
Depreciation	665.502	611.040	418.294	369.045
Total	**12.612.255**	**10.961.386**	**9.850.138**	**8.713.069**

8.23 Other expenses

The other expenses of the Group and the Company are analysed in the following table:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Prior years expenses	40.123	52.823	40.123	52.823
Other non-operating expenses	72.047	17.737	50.804	5.771
Provisions for doubtful receivables	-	250.000	-	250.000
Total	**112.170**	**320.560**	**90.927**	**308.594**

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8.24 Finance expenses (net)

The Group's and Company's net financial expenses are analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Credit interest	77.575	5.910	12.986	192
Income from recognition of bond loans at fair value	-	14.801.482	-	14.801.482
FX Differences	55.831	-	-	-
Total Financial Income	**133.405**	**14.807.392**	**12.986**	**14.801.674**
Interest Expense	(3.968.344)	(4.166.002)	(3.399.132)	(3.193.924)
Other bank expenses	(1.126.593)	(898.305)	(956.200)	(847.245)
Expense from recognition of bond loans at fair value (incl. issue costs)	(1.584.053)	(2.433.270)	(1.584.053)	(2.433.270)
Interest on Defined benefit obligation	(4.789)	(5.359)	(4.747)	(5.359)
Financial Leasing (IFRS 16)	(48.560)	(45.130)	(14.826)	(21.235)
FX Differences	-	(123.457)	-	-
Financial Expenses	(6.732.339)	(7.671.522)	(5.958.957)	(6.501.033)
Total	**(6.598.933)**	**7.135.870**	**(5.945.971)**	**8.300.641**

On February 5, 2021, new common bond loans were disbursed to refinance the Company's existing loan obligations.
CBLs were recognized at fair value, which the Management measured using the market interest rate of 7.0%, as described in Note 5.8.

The difference between the nominal amount and fair value at initial recognition is included in the financial income of the year 2021. The financial expenses of 2021 included bold loan issuance costs. The financial expenses of 2022 concern the yearly depreciation of the income from the recognition of bond loans at fair value in 2021.

8.25 Investing Activities

The Group's and Company's Investment Activities are analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Extraordinary Profits\Losses	226.044	(962.372)	226.044	(962.372)
Total	**226.044**	**(962.372)**	**226.044**	**(962.372)**

The investment results concern the profits/losses from the sale of fixed assets and show a large change due to the sale of the investment property of the parent Company in Viotia Wines during the 2021 financial year.

From the impairment test carried out on 31.12.2022 (see note 8.3) no relevant amounts emerged.

8.26 Taxation

The Group's and Company's taxes are analysed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Income Tax	(2.059.547)	(3.145.167)	(1.794.904)	(3.022.567)
Deferred Tax	189.628	(2.870.902)	189.628	(2.781.513)
Tax audit differences	0	(81.703)	0	0
Total	**(1.869.919)**	**(6.097.772)**	**(1.605.276)**	**(5.804.079)**

The tax of the Group and the Company differs from the theoretical amount that would arise using the basic tax rate as follows:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Income tax of the year	(2.059.547)	(3.145.167)	(1.794.904)	(3.022.567)
Deffered tax	189.628	(2.870.902)	189.628	(2.781.513)
Other taxes	-	(81.703)	-	-
Total	**(1.869.919)**	**(6.097.772)**	**(1.605.276)**	**(5.804.079)**
Profit before taxation	9.797.595	31.717.903	5.811.383	26.361.346
Tax rate	22%	22%	22%	22%
Expected Tax Cost	**(2.155.471)**	**(6.977.939)**	**(1.278.504)**	**(5.799.496)**
Additional taxes & surcharges for previous years	0	(81.703)	0	0
Tax effect of non-taxed income	535.387	692.828	535.387	692.828
Impact from fiscal losses for which no deferred tax was recognized / Use of transfer. tax losses	274.767	679.720	-	0
Derecognition of deferred taxes	(301.982)	(847.090)	(301.982)	(657.952)
Effect from non-deductable expenses	(610.130)	(64.088)	(610.130)	(122.940)
Effect from the change of the tax rates	0	83.481	0	83.481
Effects from differences in the tax rates of foreign subs	387.510	417.019	-	-
Total	**(1.869.919)**	**(6.097.772)**	**(1.655.229)**	**(5.804.079)**

The current tax liabilities of the Group and the Company are analyzed in the table below:

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Tax liabilities	3.221.361	3.145.167	3.158.321	3.022.567
Total	**3.221.361**	**3.145.167**	**3.158.321**	**3.022.567**

8.27 Basic Earnings per Share

The basic earnings per share have been calculated using the net results attributable to shareholders of SIDMA STEEL S.A. as numerator. The weighted average number of outstanding shares used as denominator.

	Group		Company	
	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Profit to the Shareholders of the mother company	7.927.676	25.620.131	4.206.107	20.557.266
Weighted number of shares	13.582.223	13.582.223	13.582.223	13.582.223
Basic Earnings Per Share (EURO/share)	0,5837	1,8863	0,3097	1,5135

8.28 Dividends per share

Due to accumulated losses no distribution of dividends is possible.

8.29 Non-Audited Fiscal Years

The Company has been audited by the tax authorities up to and including 2010. For the fiscal years 2011 to 2021 included, the Company received a Tax Compliance Report, according to par. 5 of article 82 of L. 2238/1994 and article 65A par.1 of L. 4174/2013, without any substantial differences. According to circular POL. 1006/2016, the companies which have been subject to the above special tax audit are not exempted from the regular audit carried out by the competent tax authorities. The Company's Management reckons that in any future re-audits by the tax authorities, if conducted, additional tax differences with significant effect on the Financial Statements will not incur.

For the fiscal year 2022, the special audit to obtain a Tax Compliance Report is in progress and the related tax certificates are expected to be granted upon publication of the Financial Statements for the fiscal year 2022. If, until the completion of the tax audit, additional tax liabilities arise, the Company believes that these will not have a significant effect on the Interim Condensed Financial Statements. It

should be noted that, in accordance with the recent legislation, the audit and the issuance of the Tax Compliance Report apply for the fiscal years 2016 onwards on a voluntary basis.
Also, on 20.01.2022 the Company received from K.E.M.E.P. regular tax audit order for the years 2018 & 2019 with the possibility of completion by 31.12.2025. Up to the date of approval of the financial statements, no other development/obstacles have been received by the tax authorities regarding the relevant audit.

For the other companies of the Group, the following applies: "SIDMA WORLDWIDE CYPRUS" has been tax audited until the fiscal year 2011 included, "SIDMA Romania S.R.L." until September 2008 included. Due to accumulated tax losses, no additional taxes are foreseen. "SIDMA Bulgaria S.A." has not been tax audited for the years 2005 to 2022 but tax audit could trace back only for the last 5 years. We do not expect substantial tax differences in Bulgaria in the event of a future tax audit.

8.30 Contingent liabilities

8.30.1 Guarantees

On 31 December 2021, the Group and the Company had the following contingent assets & liabilities:
Guarantees for assets.

- Issuance of letter of guarantees as assurance for receivables, amounting to € 1.2 million for the Group and the Company.

Guarantees for liabilities.

- Issuance of letter of guarantees as assurance for payables, amounting to € 9.9 million for the Group and the Company.
- Guarantees (cheques receivable and ceded receivables-invoice factoring) amounting to € 1.3 million, for the assurance of bank financing of the subsidiaries in Romania and Bulgaria.
- Issuance of guarantees amounting to € 11.6 million and letters of guarantees amounting to € 0.7 million for the assurance of bank financing of the subsidiaries in Romania and Bulgaria.

8.30.2 Encumbrances

There are prenotations of property mortgages on the assets of the Group and the Company and floating security right on inventory and receivables amounting to a total of € 81.5 million as detailed below:

a) an amount of € 46.5 million, which have been registered on company's real estate (except of the warehouse of the absorbed subsidiary PANELCO in Lamia), for the Common Bond Loan of € 46.5 million of the Parent Company (Facility 1).
b) an amount of € 7.2 million registered on the property (warehouse) of the absorbed subsidiary PANELCO in Lamia for the Common Bond Loan of € 7.2 million of the Parent Company (Facility 2).
c) an amount of € 25 million, registered on the company's real estate for the Common Bond Loan of € 25 million of the Parent Company (Facility 3).
d) an amount of € 7 million (establishment of a floating security right) in accordance with Law 2844/2000, on a group of stocks for the Common Bond Loan of € 44.6 million (Facility 1).
e) an amount of € 2 million (establishment of a floating security right) in accordance with Law 2844/2000, on a group of stocks for the Common Bond Loan of € 7.2 million (Facility 2).
f) an amount of € 3 million (establishment of a floating security right) in accordance with Law 2844/2000, on a group of stocks for the Common Bond Loan of € 25.0 million (Facility 3).
g) an amount of € 0.25 million (establishment of a floating security right) in accordance with Law 2844/2000, on a group of mechanical equipment at the warehouse of Inofyta for the Common Bond Loan of € 25.0 million (Facility 3).

h) an amount of € 7.3 million (mortgage establishment in the facilities and equipment of the Subsidiary in Bulgaria, SIDMA Bulgaria, as well as establishment of a floating lien on its stocks and receivables) for loans with a nominal value of € 6.2 million.
i) an amount of € 7.9 million, which have been registered on the real estate, an amount of € 1.2 million, which have been registered on the stocks and an amount of € 4 million, which have been registered on the mechanical equipment of the subsidiary SIDMA Romania SRL, for loans with a nominal value of € 6.6 million.

8.30.3 Court cases

There are no disputed or arbitrated disputes as well as decisions of judicial or arbitral bodies that have an impact on the financial position or the operating results of the Group's companies.

8.31 Risk management

Analytical description of the most significant financial risks and uncertainties that the Group can have to address is as follows:

8.31.1 Macroeconomic Environment

The risk of the Macroeconomic environment is linked to the possible inability to correctly predict the fluctuations of the macroeconomic factors that affect the operation of the Group such as inflation, GDP, economic development, etc., and could potentially lead to financial loss.

For example, a slow deceleration of inflation may lead the European Central Bank to further interest rate increases with negative effects on the financial stability of the Group. Investment plans may be delayed, and the economic activity of the country could slow down.

However, referring to Greece's finances, the rating agency Moody's restated its forecast that the GDP will grow by 1.8% in 2023 and 1.7% in 2024. At the same time, it estimates that the main axis of support for the Greek economy will remain tourism and the strong performances he will record again this year. It underlines, in fact, that the operating environment will be favorable in 2023-24, with economic and credit growth in Greece remaining higher than other EU countries thanks to the funds from the Recovery Fund.

In any case, the Group's management constantly monitors developments in the macroeconomic environment through presentations by credit rating agencies, such as S&P and Moody's, as well as financial analysis and investment strategy departments of banks in Greece and abroad. It also monitors, through monthly meetings with the heads of the subsidiaries/Business Units, the developments in the market and the macroeconomic risks of each state in which it operates, which could negatively affect the demand for the products and, by extension, its turnover.

8.31.2 Credit Risk

The Parent company as well as its subsidiaries have a policy to insure their credit sales through insurance companies and, therefore, no significant concentrations of credit risk are generated. Wholesale sales are mainly made to customers with an appropriate credit history. In 2022, no customer participated in the turnover by more than 2.5%, while there was dispersion to many customers. Retail sales are made in cash. On 31.12.2022, the Management believes that there is no material credit risk exposure that has not already been covered by provisions for bad debts. It has also organized a credit control department, charged with assessing the creditworthiness of its customers as well as determining their credit limits. The Group's exposure to credit risk is limited to financial assets, which are as follows:

	Group		Company	
Financial Assets	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Cash and cash equivalents	8.481.728	12.724.447	1.757.487	11.430.821
Trade and other receivables	67.155.342	66.295.886	57.984.549	55.336.089
Derivatives	1.428.312	-	1.428.312	-
Total	**77.065.382**	**79.020.333**	**61.170.348**	**66.766.911**

8.31.3 Interest Rate Risk

The interest rate risk mainly arises from long-term and short-term loans. Loans with variable interest rates expose the Group to cash flow risk. The Group does not consider a rapid increase in Euribor interest rates being possible given the economic situation and development prospects of the Eurozone countries and therefore it has not carried out any interest rate risk management transactions.
The table shows the sensitivity to the Period Results and the Stockholders' Equity in case of a possible change in the Group's interest rates by +/- 1%.

	Group				Company			
	Effect to P & L		Effect to Equity		Effect to P & L		Effect to Equity	
amounts in thousand €	+1%	-1%	+1%	-1%	+1%	-1%	+1%	-1%
31st December 2022	(1.058.387)	1.058.387	(1.058.387)	1.058.387	(924.798)	924.798	(924.798)	924.798
31st December 2021	(1.109.994)	1.109.994	(1.109.994)	1.109.994	(937.545)	937.545	(937.545)	937.545

8.31.4 Liquidity Risk

The Company's financial statements have been prepared based on the going concern principle.

As at 31.12.2022 the Group maintained cash available of € 8.5 million as it regularly ensures that its net borrowings do not exceed 90% of its loan liabilities. In addition, liquidity management is achieved by combining approved borrowing through factoring with or without recourse. During 2022, the Company used, on average, factoring financing of approximately € 30 million, while on 31.12.2022 it had available lines of € 21 million. In addition, the working capital of both the Group and the company amounts as of to 31.12.2022 to € 52 million and € 46 million respectively.

The maturity of the Group's financial liabilities is as follows:

	Group							
	31.12.2022				31.12.2021			
Group	Up to 6 months	6-12 months	1-5 years	More than 5 years	Up to 6 months	6-12 months	1-5 years	More than 5 years
Long-term borrowings	15.454.734	9.514.128	15.406.264	50.108.475	16.794.082	4.729.420	30.681.667	43.147.899
Trade Payables	49.067.150	-	-	-	49.642.947	-	-	-
Other Payables	3.174.845	-	-	-	5.529.628	-	-	-
Total	**67.696.729**	**9.514.128**	**15.406.264**	**50.108.475**	**71.966.657**	**4.729.420**	**30.681.667**	**43.147.899**
Discounting of loan obligations under IFRS 9	(772.428)	(777.191)	(5.825.064)	(4.028.701)	(787.307)	(792.742)	(5.985.310)	(5.417.725)
Total	**66.924.301**	**8.736.937**	**9.581.200**	**46.079.774**	**71.179.350**	**3.936.678**	**24.696.357**	**37.730.174**

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Group	Company							
	31.12.2022				31.12.2021			
	Up to 6 months	6-12 months	1-5 years	More than 5 years	Up to 6 months	6-12 months	1-5 years	More than 5 years
Long-term borrowings	15.154.734	2.879.191	13.698.439	45.607.975	15.208.196	2.712.464	21.750.823	41.532.356
Trade Payables	35.071.059	-	-	-	38.136.132	-	-	-
Other Payables	2.496.953	-	-	-	4.911.450	-	-	-
Total	**52.722.745**	**2.879.191**	**13.698.439**	**45.607.975**	**58.255.778**	**2.712.464**	**21.750.823**	**41.532.356**
Discounting of loan obligations under IFRS 9	(772.428)	(777.191)	(5.825.064)	(4.028.701)	(787.307)	(792.742)	(5.985.310)	(5.417.725)
Total	**51.950.317**	**2.102.000**	**7.873.375**	**41.579.274**	**57.468.470**	**1.919.722**	**15.765.513**	**36.114.631**

8.31.5 Risk of Fluctuation of Raw Material Prices

The sale prices of the manufactured products are largely dictated by the prices of the raw material. The fluctuations in the international prices of steel products affect (positively or negatively) the Group's profit margin, since the fluctuation of the sale prices of the products cannot be entirely synchronized with the prices of our not yet received orders and the prices of our inventory. The Group's gross profit margin is positively affected in case of increasing prices of the raw materials and negatively otherwise. The fluctuation of the prices of the products marketed by the Group cannot be covered by hedging, therefore its earnings are affected accordingly due to devaluation or overvaluation of the inventory.
Indicatively we report that during a four-year period, from January 2018 to December 2022, the difference between the maximum and minimum CIF price of three of the most important products of the Group, as well as the standard deviation, are as follows:

€ / MT	Hot Rolled Materials	Cold Rolled Materials	Galvanized Materials
Minimum to Maximum Value Difference	781	844	788
Standard Deviation	200	235	230

Correspondingly, the gross profit margin had fluctuations of the order of 787 base points between maximum and minimum prices. An increase of the prices corresponds to an increase of the gross profit %, without being able to quantify the exact ratio between them. For every 50 base points of fluctuation of the gross profit %, the effect on the 2022 and 2021 earnings would be approximately:

GROUP	2022		2021	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	1.326	-1.326	1.132	-1.132
Equity	1.326	-1.326	1.132	-1.132

COMPANY	2022		2021	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	865	-865	750	-750
Equity	865	-865	750	-750

8.31.6 Currency Risk

The Group operates in Europe and therefore the bulk of its transactions is carried out in Euros. However, for the small part of the Group's goods purchases made in US Dollars, the Group carries currency forward contracts.

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In addition, the Group is exposed to currency risks from investments in foreign countries. Specifically, for the subsidiary in Romania, as a natural hedge the Group's policy is to use borrowings in the respective currency - whenever this is possible - to reduce exposure to risk in case of devaluation of local currency against the Euro. The foreign exchange risk problem does not apply to the Bulgarian subsidiary because its currency is locked against the euro.

The tables with the remaining receivables and liabilities in Foreign Currency for the Group are as follows:

	Group			
	31.12.2022		31.12.2021	
amounts in €	**USD**	**RON**	**USD**	**RON**
Financial Current Assets	-	1.015.494	836.646	10.743.824
Financial Liabilities	(18.872)	-	-	-
Short-term elements	**(18.872)**	**1.015.494**	**836.646**	**10.743.824**
Financial Current Assets	-	-	-	-
Financial Liabilities	-	-	-	-
Long-term elements	-	-	-	-

The change in the results and the Stockholders' Equity of the Group from a possible change +/-(10%) in the foreign currency exchange rate is as follows:

	31.12.2022			
	+ 10%	- 10%	+ 10%	- 10%
amounts in €	**USD**		**RON**	
Profits (losses) before taxes	3.791	440	(128.148)	155.616
Equity	3.791	440	(345.881)	422.744

	31.12.2021			
	+ 10%	- 10%	+ 10%	- 10%
amounts in €	**USD**		**RON**	
Profits (losses) before taxes	(76.059)	92.961	(221.761)	271.041
Equity	(76.059)	92.961	(218.485)	267.037

8.32 Capital Management

The policy of the Group consists in maintaining a strong capital base to preserve the trust of investors, creditors and the market and enable the future development of Group activities. The Group monitors capital performance which is defined as net results divided by total equity, excluding the non-controlling interests. In addition, the Group monitors the level of dividends distributed to shareholders.

The Group tries to maintain the equilibrium between higher returns that could be attained through higher borrowing levels and the advantages and security provided by a robust and sound capital structure. The Group does not have a specific plan for own shares acquisition. There were no changes in the approach adopted by the Group in relation to capital management during the FY 2022.

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8.33 Fair value measurement

8.33.1 Financial assets and liabilities

Financial assets and liabilities measured at fair values in the Balance Sheet were classified into three hierarchical levels. The classification table of financial data is defined by the quality of the data used to determine the fair value, as follows:

- Level 1: financial instruments measured at fair value using quoted prices in active markets.
- Level 2: financial instruments measured at fair value using other indisputable objective prices outside active markets.
- Level 3: financial instruments measured based on the Company's estimates, as there are no observable market data.

The fair value of the following financial assets and liabilities of the Group and the company approximate their carrying amount:

- Other current assets
- Trade and other receivables
- Other receivables
- Cash and cash equivalents
- Trade and other payables
- Other current liabilities

8.33.2 Non financials assets

Regarding the non-financial assets (land, buildings, and machinery), their fair values (level 3) on 31.12.2022 and 31.12.2021 were for the Group and the company as follows:

	Group		Company	
Level 3	31.12.2022	31.12.2021	31.12.2022	31.12.2021
Own Land, Buildings, Machinery	40.547.628	41.248.291	30.021.574	30.612.841
	40.547.628	**41.248.291**	**30.021.574**	**30.612.841**

Company's and Group's own properties (land, buildings & mechanical equipment) are shown on their adjusted value, which is the fair value at the date of revaluation less subsequent accumulated depreciation and impairment. Investment property is shown on their fair value.

Revaluations of assets are made periodically so that carrying amounts do not differ materially from those would have been calculated using the fair value at the end of each reporting period. Any goodwill arising from revaluations of such land, buildings, and production equipment is being recognized in other comprehensive income and transferred directly to equity in the revaluation reserve, except for the amount reversing a previous impairment loss for the same asset that had been recognized in the results.
The decrease in fair value arising from the revaluation of land, buildings and production equipment is recognized in the income statement, except for the amount that reverses a previous goodwill on the same asset, which had been recognized in the revaluation reserve.
The last time, the fair value of the Company's and the Group's fixed assets was calculated by an independent appraisal firm, was on 31.12.2020.

8.34 Number of personnel

The average number of employees at the end of the reporting and the previous year for the group and the company is presented in the following table:

	Group		Company	
No. of persons	1.1-31.12.2022	1.1-31.12.2021	1.1-31.12.2022	1.1-31.12.2021
Average no. of personnel	240	241	163	163

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8.35 Significant Transactions between the Company and Related Parties

The most singificant transactions of the Company with its related parties wihtin the meaning of IAS 24 are pressented below:

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Sale of goods/ services				
Subsidiaries	-	95.444	-	22.827
Other related parties	9.273.532	4.497.732	7.645.122	4.865.812
Total	**9.273.532**	**4.593.176**	**7.645.122**	**4.888.639**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Other income				
Subsidiaries	-	112.845	-	-
Other related parties	4.351.480	3.741.528	5.603.852	4.597.855
Total	**4.351.480**	**3.854.373**	**5.603.852**	**4.597.855**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Receivables				
Subsidiaries	-	58.548	-	2
Other related parties	2.505.965	1.818.962	3.405.001	2.969.168
Total	**2.505.965**	**1.877.510**	**3.405.001**	**2.969.170**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Purchase of goods / services				
Subsidiaries	-	-	-	24.297
Other related parties	54.209.114	15.474.301	38.966.780	11.488.941
Total	**54.209.114**	**15.474.301**	**38.966.780**	**11.513.238**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Other expenses				
Subsidiaries	-	-	-	-
Other related parties	1.208.766	1.178.616	1.155.700	1.120.945
Total	**1.208.766**	**1.178.616**	**1.155.700**	**1.120.945**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Trade and other payables				
Subsidiaries	-	-	-	141
Other related parties	28.501.172	17.238.589	33.356.026	21.761.194
Total	**28.501.172**	**17.238.589**	**33.356.026**	**21.761.335**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Purchase of fixed assets				
Subsidiaries	-	-	-	-
Other related parties	88.745	60.081	99.491	99.491
Total	**88.745**	**60.081**	**99.491**	**99.491**

	1.1-31.12.2022		1.1-31.12.2021	
Amounts in €	**Group**	**Company**	**Group**	**Company**
Sale of fixed assets				
Subsidiaries	-	-	-	-
Other related parties	500.000	500.000	11.500.000	11.500.000
Total	**500.000**	**500.000**	**11.500.000**	**11.500.000**

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8.36 Management and Board of Directors' fees

	Group		Company	
	1.1-31.12.2022	1.1-31.12.2021	1.1-31.12.2022	1.1-31.12.2021
Management Fees (short-term)	821.698	807.617	580.743	547.865
Board of Directors fees (short-term)	56.142	63.617	36.620	45.800
Total	**877.840**	**871.234**	**617.363**	**593.665**

8.37 Post Balance Sheet Events

There are no other events after 31.12.2022 that significantly affect the financial situation and the results of the Group and the Company except the following:

- The Company sold in February 2023 the interest rate swap it had contracted with the National Bank of Greece and Piraeus Bank. The Company had bought, last year, two interest rate risk hedging products until the maturity of the long-term loans of a total amount of € 10 million. From the am sale (closing of the position) the company collected approximately € 1.3 million.

8.38 Approval of Financial Statements

The Annual Financial Report for the year 2022 (1.1.2022 to 31.12.2022) was approved by the Company's Board of Directors on April 20, 2023, has been posted on the Company's website www.sidma.gr, and is under approval of the General Meeting of Shareholders which is expected to be held in June 2023.

Aspropyrgos, Attiki, – April 20, 2023

PRESIDENT OF THE BOARD OF DIRECTORS	CHIEF EXECUTIVE OFFICER
PANAGIOTIS P. BITROS	ANTONIOS P. KARADELOGLOU
THE CHIEF FINANCIAL OFFICER	ACCOUNTING DEP. HEAD
MICHAEL C. SAMONAS	PARIS G. PAPAGEORGIOU