ANNUAL FINANCIAL REPORT

FOR FISCAL YEAR FROM JANUARY 1st TO DECEMBER 31st, 2021

(According to article 4 of Law 3556/2007)

APRIL 2022

SIDMA STEEL S.A.

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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:

A. the attached financial statements of SIDMA STEEL S.A. for the annual period 01.01-31.12.2021, 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

B. 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 08, 2022

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 TRADINGSIDMA S.A. (the Company), which comprise the separate and consolidated statement of financial position as at December 31, 2021, 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 TRADINGSIDMA S.A. and its subsidiaries (the Group) as at December 31, 2021, 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 Matters	How our audit addressed the key audit matter
Recoverability of trade receivables (separate and consolidated financial statements)	
As of December 31, 2021, the trade receivables of the Group and the Company amounted to € 58.2 million and € 48.8 million respectively, while the related accumulated impairment amounted to € 1.6 million and € 0.9 million respectively, as described in Note 8.7 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 8.7 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 Matters	How our audit addressed the key audit matter
Assessment of impairment of investments in subsidiaries (separate financial statements)	
As of 31 December 2021, 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) is determined as be 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 31/12/2021.

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 TRADINGSIDMA 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, 2021 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 9 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 TRADINGSIDMA 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, 2021, in XHTML format ("21380093P5MN4CJUHL68-2021-12-31-el.xhtml"), as well as the provided XBRL file ("21380093P5MN4CJUHL68-2021-12-31-el.zip") with the appropriate mark-up, on the aforementioned consolidated 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 shall be marked-up with XBRL tags, 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, 2021, 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, 2021, in XHTML format ("21380093P5MN4CJUHL68-2021-12-31-el.xhtml"), as well as the provided XBRL file ("21380093P5MN4CJUHL68-2021-12-31-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.

Athens, 08 April 2022
The Certified Accountant

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

Grant Thornton
Chartered Accountants Management Consultants
56, Zefirou str., 175 64 Palaio Faliro, 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 2021

C.1 Introduction

This Annual Report of the Board of Directors (hereinafter referred to as the "Report") refers to the financial year 2021 (1.1.2021-31.12.2021). The Report has been drafted and is in line with the relevant provisions of Articles 150-154 of Law 4548/2018, Article 4 of Law 3556/2007 (Government Gazette 91A / 30.4.2007) as well as the executive decisions of the Board of Directors of the Hellenic Capital Market Commission.

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 2021.

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

In 2021, the world economy showed signs of recovery as a result of fiscal and monetary strengthening of economies by governments and central banks. Although the spread of the COVID-19 pandemic was not fully controlled, the economic impact was not as strong as in 2020. In 2021, developed economies recovered, albeit to varying degrees, while the global GDP change is estimated at + 5.5% and its Eurozone counterpart at 5.2%. In Greece, the GDP growth rate stood at + 8.3% as a result of the gradual lifting the restrictive measures in the second half of the year.

Similarly, in 2021, the Economic Climate Index strengthened, reaching pre-pandemic levels in the 4th quarter of the year. However, in 2021, adverse events include the rapid increase in inflation from the third quarter of the year, mainly due to the large increase in energy, reduction in supply of raw materials as well as the expansive fiscal policy of Governments worldwide. This trend worsened in 2022, following the recent geopolitical crisis in Ukraine. In its Global Macro Outlook 2022-23 (March 2022 Update) report, Moody's revised its inflation estimates from its previous report in February 2022, upwards for a large number of both - developed and emerging economies.

In the aforementioned context, taking advantage of the increase in raw material prices, SIDMA Steel recorded a high increase in turnover and profitability both - at parent company and group level.

Specifically, in 2021, SIDMA's consolidated turnover amounted to € 226.4 million, compared to € 133.3 million in 2020, increased by 70.0%, reflecting the increase in the average selling price of steel products in 2021 by 64.5% compared to 2020. Consolidated with the agent's sales, turnover stood at € 274.2 million compared to € 162.8 million in the previous year, increased by 68.5%. In addition, earnings before interest, tax, depreciation, and amortization (EBITDA) amounted to € 27.1 million versus € 6.4 million in 2020, recording an increase of 327% mainly due to the increase in turnover and the increase of 50% in gross profit margin. Finally, earnings before tax, after many years of loss-making, presented high profitability as they increased to € 31.7 million, versus € 0.8 million losses in 2020.

At the company level, in 2021, SIDMA's turnover amounted to € 150.1 million versus € 93.9 million, recording an increase of 60%, while consolidated with the agent's sales amounted to € 197.9 million versus € 123,4 million in 2020, increased by 60.4%. Earnings before tax, interest, depreciation and amortization (EBITDA) amounted to € 20.2 million, from € 5.6 million in 2020 mainly due to the increase in turnover and gross profit margin by 44%, while results before tax recorded profits of € 26.4 million from € 0.4 million in 2020. The accounting treatment of the Company's loan liabilities refinancing, completed during the year, also contributed to the improvement in earnings before tax. Specifically, on February 5, 2021, the Company's existing loan liabilities were refinanced, thus, loan liabilities amounting to € 72.6 million were reclassified to long-term liabilities of the Company and the Group, resulting in the improvement of the Group's and the Company's working capital. In accordance with the provisions of IFRS 9, the new loan liabilities were recorded at fair value resulting in their decrease of € 12.4 million with the corresponding improvement of the Group's and the Company's results.

Regarding the Balkan subsidiaries, SIDMA Bulgaria recorded 67% increase in its turnover amounting to € 44.6 million compared to € 26.7 million with an average sale price increased by 64.6% compared to 2020, increase in operating EBITDA amounting to € 3,505 thousand from € 733 thousand in 2020 (increase 378%), and increase in earnings before tax amounting to € 2,970 thousand in 2021 from € 130 thousand in the previous year. The improvement in the results arises from both- the increase in turnover and the increase in gross profit percentage by 51% in relation to the previous year.

Moreover, SIDMA Romania recorded an increase in its turnover of 146%, amounting to € 32.7 million compared to € 13.3 million in 2020 (with the average sale price increased by 77.8% compared to 2020). The increase in turnover arises from both - the increase in sales prices and mainly, from the fact that liquidity problems, addressed by the subsidiary in the previous years, were solved as the restructuring of its debt by the participating banks was completed. In addition, the parent company increased its share capital by €7.7 million. In this context, the operating EBITDA increased by € 3,475 thousand from zero profits in 2020, while earnings before tax, after many years of loss-making results, recorded profits of € 2,411 thousand in 2021 versus losses of € 1,280 thousand in the previous year. The subsidiary's equity turned positive again amounting to € 2,404 thousand from negative € 7,807 thousand in 2020.

Finally, it is to be noted, that the combination of equity strengthening, positive results of the year and refinancing the Company's borrowings have drastically improved the capital structure financial ratios and the Company's ability to service its borrowings as at 31.12.2021:

- Net Debt Ratio to Equity = 2.3
- Interest Coverage Ratio (EBITDA / Net Interest) = 6.3.

with the Group's liquidity amounting to € 12.7 million from € 16.7 million at the end of 2020, and its net loan liabilities decreasing by 26% or € 25.5 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.

The main APMs for the Group and the Company for the year 1.1 - 31.12.2021 are as follows:

Group	01.01 - 31.12.2021	01.01 - 31.12.2020 REVISED	Δ (%)
Turnover	226.409.561	133.254.677	69,9%
Consignment Sales	47.848.764	29.495.904	62,2%
Total Sales	**274.258.325**	**162.750.581**	**68,5%**
Gross Profit Margin	34.663.680	13.618.885	154,5%
Earnings before taxes	31.717.903	(792.333)	-4103,1%
EBITDA	27.118.699	6.352.789	326,9%

Company	01.01 - 31.12.2021	01.01 - 31.12.2020 REVISED	Δ (%)
Turnover	150.068.051	93.884.791	59,8%
Consignment Sales	47.848.764	29.495.904	62,2%
Total Sales	**197.916.815**	**123.380.695**	**60,4%**
Gross Profit Margin	26.113.903	11.363.473	129,8%
Earnings before taxes	26.361.346	368.571	7052,3%
EBITDA	20.164.507	5.628.895	258,2%

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

Group	01.01 - 31.12.2021	01.01 - 31.12.2020 REVISED	Δ (%)
Gross Margin			
(Gross Profit/ Turnover)	15,31%	10,22%	5,1%
EBITDA Margin:			
(EBITDA/ Turnover)	11,98%	4,77%	7,2%
Net Profit Margin			
(Profit before Tax / Turnover)	14,01%	-0,59%	14,6%
Liquidity Ratio			
Current Assets/Current Liabilities (1)	1,6	1,0	67,8%
Interest cover ratio			
EBITDA / Net Interest	6,5	1,3	406,2%

Company	01.01 - 31.12.2021	01.01 - 31.12.2020 REVISED	Δ (%)
Gross Margin (Gross Profit/ Turnover)	17,40%	12,10%	5,3%
EBITDA Margin: (EBITDA/ Turnover)	13,44%	6,00%	7,4%
Net Profit Margin (Profit before Tax / Turnover)	17,57%	0,39%	17,2%
Liquidity Ratio Current Assets/Current Liabilities	1,6	1,1	46,8%
Interest cover ratio EBITDA / Net Interest (1)	6,3	1,6	299,0%

(1) Net Interest includes Debit Interest as shown in Note 8.24 Financial Costs.

C.4 Significant Events During 2021

The important events that took place in the year from 1 January to 31 December 2021 as well as their effect on the financial statements are as follows:

A. Refinancing the Company's Loan Liabilities

On February 5, 2021, common bond loans were disbursed to refinance the Company's existing loan liabilities as follows:

- secured CBL amounting to forty-four million six hundred thirty five thousand Euro (€ 44,635,000), was covered by "NATIONAL BANK OF GREECE SA", "EUROBANK SA» and "PIRAEUS BANK SA", as initial bondholders,
- secured CBL amounting to seven million one hundred seventy-seven thousand Euro (€ 7,177,000), covered by "NATIONAL BANK OF GREECE SA" and "EUROBANK SA", as initial bondholders,
- secured CBL amounting to twenty-four million nine hundred eighty thousand Euro (€ 24,980,000), covered by "NATIONAL BANK OF GREECE SA", "EUROBANK SA" and "ATTICA BANK SA" as initial bondholders,

as provided for in the contractual documents on the issuance of the aforementioned CBLs, signed on 16 October 2020.

B. Regular General Meeting

The Regular General Meeting of the company's shareholders, held in Athens on June 10, 2021, was attended by representatives of 82.59% of the Share Capital and voting rights and the following decisions were unanimously approved:

- Annual Financial Statements of FY 2020, 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 2020, as well exempting the Certified Public Accountants from any liability for compensation for the operations of FY 2020 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 2020, as well as pre-approval of the payment of remuneration and compensation of the members of the Board of Directors for 2021 according to Article 109 of Law 4548/2018.
- The Company's Remuneration Report for the period 01/01/2020 to 31/12/2020, according to Article 112 of Law 4548/2018.
- Appointment of Certified Public Accountants and approval of their remuneration for 2021.

- 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.
- Definition of the type, members and term of the Audit Committee.
- The Eligibility Policy of the members of the Board of Directors in accordance with Article 3 of Law 4706/2020 and Circular 60/2020 of the Hellenic Capital Market Commission ("Guidelines for the Eligibility Policy of Article 3 of Law 4706/2020"), as prepared and approved by the Board of Directors at its Meeting held on 14/05/2021.
- Issuance of a secured CBL in accordance with the provisions of Law 4548/2018 and Article 14 of Law 3156/2003, amounting to € 5,307,000, to be covered by the National Bank of Greece SA in the context of covering the share capital increase of the subsidiary SIDMA ROMANIA SRL in order to restructure the loans of the latter.
- Amendment to Article 2 of the Articles of Association which concerns the registered office of the Company, as follows:

"Article 2

1. The registered office of the Company is the Municipality of Aspropyrgos, Attica.
2. The Company may establish branches or offices in other cities of Greece or abroad by decision of its Board of Directors, which at the same time will define their responsibilities. "

Finally, during the General Meeting, the Company Shareholders were informed about:

- The annual report of the activities of the Audit Committee by the Chairman of the Audit Committee.
- The statement of equity by the Board of Directors.

C. Signing contractual documents on the issuance of bond loans

On October 20, 2021, contractual documents were signed regarding the Company's issuing a secured CBL in accordance with the provisions of Law 4548/2018 and article 14 of Law 3156/2003, amounting to € 5,307,000, in the context of the coverage of the share capital increase of the subsidiary SIDMA ROMANIA SRL to restructure the loans of the latter. The loan of € 5,237,400 was issued on 2/12/2021 and was covered by the National Bank of Greece SA. On the same day, the share capital increase of the subsidiary in Romania, SIDMA ROMANIA SRL, was equally covered.

D. Signing contractual documents on refinancing SIDMA Romania subsidiary's loan

On October 25, 2021, and November 18, 2021, the contractual documents on refinancing the loans of the subsidiary in Romania were signed, SIDMA Romania with Eurobank / doValue and ALPHA Bank / CEPAL respectively. The amount of refinanced loans stood at € 5.9 million, and they will mature in 10 years with repayment of 50% of their amount during this period.

E. Sale of real estate to an associate.

In December 2021, the company's Real Estate in Oinofyta was sold to ELVALHALCOR (associate) against a consideration of € 11,500 thousand. As of September 3, minutes of the Board of Directors had been published in the GENERAL COMMERCIAL REGISTER (G.E.MI.) on approving the special license under Article 99 par. 2 and Article 101 par. 1 of Law 4548/2018 for the aforementioned transaction.

C.5 Risk Management

The Company and the Group face certain risks and uncertainties that may adversely affect their operation, financial performance, and future prospects. Therefore, they developed a risk management and evaluation strategy program. The corporate governance system adopted by the Company includes adequate and effective risk management activities, continuously applied by the parent company and its subsidiaries, in all their directorates, departments and facilities, through the existing procedures and policies.

Taking into account the effects of COVID-19, fluctuation of steel prices in the stock markets and provisions of Law 4706/2020 on Corporate Governance of public limited companies, the Company's risk management program was further improved through establishing separate Risk Management Regulatory Compliance units, governed by their own Operating Regulations and their own Policies. In addition, the Chief Risk Officer, and the Chief Compliance Officer, appointed by the Company's CEO based on the Company's Recruitment Policies and Procedures, have the appropriate knowledge and relevant professional experience, as well as free access to any organizational unit of the Company, and are aware of any information required to perform their duties.
At the operational level, a recording, analytical description and evaluation of the most significant risks that the Company may have to address was carried out, while at the same time the degree of compliance of the Company with the current legislative and regulatory framework was reviewed. The main risks and uncertainties that the Company and the Group may be exposed to in 2022 are summarized in the table below, while the corrective measures - either already implemented or to be implemented - are also recorded.

Risks categories	Description of significant risks	Potential impact	Main ways to address them	Risks related to key issues
Reputation and Clientele Risk	Inability to innovate and meet customer needs	Decrease in sales, loss of market share and financial loss	• Implementation of quality policy, sustainable development policy • Improving the capabilities of our key customers aiming at cooperation and development with top customers • Development of our partners in distribution networks	Financial effects
Reputation and Clientele Risk	Environmental pollution	Financial sanctions, damage to our license, and increased business costs	• Strict compliance controls in accordance with the effective Environmental Legislation	Packaging, recycling and waste management
Reputation and Clientele Risk	Corruption and bribery	Financial sanctions, damage to our corporate reputation, dedication of management time to resolving legal issues and	• Establishment of whistleblowing plan for incidents that do not comply with the code of ethics and business ethics of our company • Establishment of evaluation questionnaires of our suppliers and partners	Corporate governance, business ethics and fight against corruption

Risks categories	Description of significant risks	Potential impact	Main ways to address them	Risks related to key issues
		financial loss		
Operational Risk	Inability to attract, retain and employ a sufficient number of trained and experienced staff	Inability to implement the company's development plans	• Development of executives and improvement of employees' skills • Promoting an inclusive work environment and creating shared value among employees	Employee well-being, development, and participation
Operational Risk	Serious labour accidents	Death or injury of an employee	• Establish strict controls for hygiene and safety at the company's facilities • Ongoing education and training of employees	Human resources, Health and Safety, employee well-being
Operational Risk	Leakage, loss, theft of personal passwords in the company's computer system	Violation of corporate and personal privacy, information leakage and loss of the company's competitive advantage	• Implementation of proper use and security checks of PC • Apply political passwords • Staff education and training	Information systems security
Financial Risk	Risks to the macroeconomic environment (including the effects of COVID-19)	Decrease in sales, trading activity, impact on liquidity and financial loss	• Strict customer credit control • Satisfactory dispersion of clientele • Maintaining sufficient liquidity of the company	Economic consequences
Financial Risk	Credit risk, interest rate risk, liquidity risk, raw material price fluctuation risk, foreign exchange risk	Effect on liquidity and financial loss	• Strict customer credit control • Satisfactory dispersion of clientele • Maintaining sufficient liquidity of the company • Our company is constantly considering actions, such as restructuring of structures, reduction of support costs and use of its assets to improve its financial position.	Economic consequences

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

(a) Macroeconomic Environment

The COVID-19 pandemic, despite the positive prospects that seem to be fading, continues to have an adverse impact on economic conditions around the globe. The parent company and its subsidiaries responded immediately, prioritizing the health and safety of human resources, their suppliers and partners, taking measures to ensure the going concern with the least possible effects.

Regarding the effects of recent developments in Ukraine and Russia on the Group's and the Company's operations, we would like to report that in 2021:

- The turnover percentage related to sales of imported products from the above countries was approximately 6.5% of the total.
- The product acquisition percentage from the above countries concerned approximately 6.8% of the Company's total imports.
- The Company's assets do not have any exposure regarding the above countries.

The Company and the Group have a broad dispersion of suppliers from various countries, thus ensuring smooth operation of the supply chain. Many steel producers, however, depend to a considerable degree on raw material supplies from some regions of Ukraine and Russia. Currently, it is impossible to measure the impact of the recent developments in Ukraine and Russia on the operations of our suppliers and - consequently - on the respective operations of the Company and the Group. However, increases in energy and inflation could have indirect effects by increasing their operating costs as steel mills are energy consuming. Eurofer, the European association of steelmakers, is sounding the alarm, stressing that key industries, such as steelmakers, will not be able to sustain the energy costs they are experiencing today.

Regarding the effects of the energy crisis on the indirect costs of the company and the Group, given that they are steel service centres and not steel manufacturers, even at current energy prices, energy costs as a percentage of total expenses would rise, for 2021, from 3.1% to 5.4%.

(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 2021, no customer participated in the turnover by more than 2.0%, while there was dispersion to many customers. Retail sales are made in cash. On 31.12.2021, 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	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Cash and cash equivalents	12.724.447	16.742.221	11.430.821	15.748.471
Trade and other receivables	66.295.886	52.263.379	55.336.089	46.643.957
Total	**79.020.333**	**69.005.600**	**66.766.911**	**62.392.428**

(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 2021	(1.109.994)	1.109.994	(1.109.994)	1.109.994	(937.545)	937.545	(937.545)	937.545
31st December 2020	(1.145.939)	1.145.939	(1.145.939)	1.145.939	(940.414)	940.414	(940.414)	940.414

(d) Liquidity Risk

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

As at 31.12.2021 the Group maintained cash available of € 12.7 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. In 2021, the Company signed a series of new financing agreements through factoring without recourse (zero risk), the limit of which now amounts to approximately € 16 million, as it was considered by the creditor banks that following the completion of the disbursement of the bond loans in February 2021 the Company and the Group Equity have been consolidated and the provisions of par. 4 of Article 119 of Law 4548/2018 no longer exist. The same applies to the working capital of both the Group and the Company which is now positive and on 31/12/2021 amounts to € 51 million and € 38 million respectively.

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

	Group							
	31.12.2021				31.12.2020			
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	16.006.775	3.936.678	24.696.357	37.730.174	52.867.017	53.877.343	8.407.186	-
Trade Payables	49.642.947	-	-	-	31.875.442	-	-	-
Other Payables	5.529.628	-	-	-	4.582.984	-	-	-
Total	**71.179.350**	**3.936.678**	**24.696.357**	**37.730.174**	**89.325.443**	**53.877.343**	**8.407.186**	**0**

	Company							
	31.12.2021				31.12.2020			
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	14.420.889	1.919.722	15.765.513	36.114.631	39.959.358	53.167.720	1.263.191	-
Trade Payables	38.136.132	-	-	-	24.454.017	-	-	-
Other Payables	4.911.450	-	-	-	4.326.660	-	-	-
Total	**57.468.470**	**1.919.722**	**15.765.513**	**36.114.631**	**68.740.034**	**53.167.720**	**1.263.191**	**0**

(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 2017 to December 2021, 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	558	701	675
Standard Deviation	144	180	153

Correspondingly, the gross profit margin had fluctuations of the order of 800 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 2021 and 2020 earnings would be approximately:

GROUP	2019		2020	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	1.132	-1.132	666	-666
Equity	1.132	-1.132	666	-666

COMPANY	2019		2020	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	750	-750	469	-469
Equity	750	-750	469	-469

(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:

	Group			
	31.12.2021		31.12.2020	
amounts in €	**USD**	**RON**	**USD**	**RON**
Financial Current Assets	836.646	10.743.824	1.442	3.562.346
Financial Liabilities	-	-	-	- 15.982.575
Short-term elements	**836.646**	**10.743.824**	**1.442**	**-12.420.230**
Financial Current Assets	-	-	-	-
Financial Liabilities	-	-	-	- 1.086.580
Long-term elements	-	-	-	- 1.086.580

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:

	31.12.2021			
	+ 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

	31.12.2020			
	+ 10%	- 10%	+ 10%	- 10%
amounts in €	**USD**		**RON**	
Profits (losses) before taxes	-131	160	116.352	-142.207
Equity	-131	160	727.318	-888.945

C.6 Objectives and Prospects for 2022

For the last five years the company has been on a growth trajectory, increasing year by year its sales volume, while the completion of the refinancing of its loans and the highest profitability of the previous year have strengthened its capital structure and its liquidity and have significantly increased its capability to finance its working capital. Thus, the company has full capacity to take advantage of favorable conditions but also enhanced resilience to any turbulence. The above facts are considered critical taking into consideration the opportunities but also the threats of the economic and business environment.

2022 started with positive prospects, with the Greek economy continuing to recover, despite the continuing exogenous inflationary pressures from the middle of last year.

Russia's invasion to Ukraine, however, sparking a boom in energy, metals and food prices, but also exacerbating global geopolitical instability and uncertainty, puts continued growth in doubt, despite the expected start of disbursements from the new NSRF and the European Recovery and Resilience Mechanism (RRF). Assuming that the general geopolitical situation will not be further aggravated, and its economic consequences will not intensify, SIDMA Steel is expected, in 2022, to continue its development course.

C.7 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.

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Sales of goods				
Subsidiares	0	22.827	0	5.978
Other companies of the group	7.645.122	4.865.812	3.852.074	3.188.612
Total	**7.645.122**	**4.888.639**	**3.852.074**	**3.194.589**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Sales from services rendering				
Subsidiares	0	0	0	12.516
Other companies of the group	5.603.852	4.597.855	2.971.678	2.388.905
Total	**5.603.852**	**4.597.855**	**2.971.678**	**2.401.421**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Sales of fixed assets				
Subsidiares	0	0	0	0
Other companies of the group	11.500.000	11.500.000	11.713	11.713
Total	**11.500.000**	**11.500.000**	**11.713**	**11.713**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Receivalbes				
Subsidiares	0	2	0	2
Other companies of the group	3.405.001	2.969.168	2.346.503	2.198.330
Total	**3.405.001**	**2.969.170**	**2.346.503**	**2.198.331**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Purchases of goods				
Subsidiares	0	24.297	0	34.968
Other companies of the group	38.966.780	11.488.941	20.876.682	5.939.347
Total	**38.966.780**	**11.513.238**	**20.876.682**	**5.974.315**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Receiving of services				
Subsidiares	0	0	0	155
Other companies of the group	1.155.699	1.120.945	915.236	888.625
Total	**1.155.699**	**1.120.945**	**915.236**	**888.780**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Purchases of fixed assets				
Subsidiares	0	0	0	0
Other companies of the group	99.491	99.491	41.595	41.595
Total	**99.491**	**99.491**	**41.595**	**41.595**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Payables				
Subsidiares	0	141	0	141
Other companies of the group	33.356.026	21.761.194	23.869.569	16.671.049
Total	**33.356.026**	**21.761.335**	**23.869.569**	**16.671.190**

Sales

	01/01-31/12/2021		01/01-31/12/2020	
Company	**Group**	**Company**	**Group**	**Company**
SIDENOR STEEL INDUSTRY SA	62.980	62.980	24.276	24.276
SOVEL S.A.	144.479	144.479	93.116	93.116
STOMANA S.A	2.338.992	-	511.598	-
STOMANA ENGINEERING AD	47.509	-	-	-
ETIL S.A.	98.005	98.005	239.767	239.767
ERLIKON WIRE PROCESSING S.A.	65.912	65.912	30.210	30.210
AEIFOROS SA	75.649	6.514	7.149	7.149
SIDMA Bulgaria S.A.	-	-	-	-
ELVALHALCOR S.A.	1.211.352	1.211.352	183.208	183.208
CORINTH PIPEWORKS S.A.	69.598	69.598	153.779	153.779
ATTICA METALIC WORKS S.A.	676.898	676.898	369.883	369.883
TEKA SYSTEMS S.A.	50.317	50.317	2.146	2.146
ANTIMET S.A.	883.811	883.811	821.368	821.368
HELLENIC CABLES S.A.	38.274	38.274	21.985	21.985
ETEM SA	4.535	4.535	158	158
VIOMAL S.A.	311.083	311.083	151.749	151.749
SIDMA ROMANIA SRL	-	22.827		5.978
ANAMET SA	21.461	21.461	17.087	17.087
FITCO SA	14.514	14.514	9.069	9.069
SIGMA AD	-	-	-	-
ANOXAL S.A.	40.823	40.823	-	-
DIA.VI.PE.THI.V. SA	301	301	720	720
VIANATT SA	-	-	615	615
SYMETAL S.A.	161.562	161.562	365	365
SIDERAL SHPK	-	-	6.708	6.708
DOJRAN STEEL DOO	63.153	63.153	-	-
FULGOR SA	607.904	607.904	601.789	601.789
ECORESET SA	15.413	15.413	18.442	18.442
ERGOSTEEL	154.056	154.056	8.222	8.222
VEPAL SA	-	-	492	492
EPIRUS METALWORKS SA	162.868	162.868	423.743	423.743
ICME ECAB SA	205.811	-	71.561	-
ETEM BULGARIA SA	-	-	-	-
AEIFOROS BULGARIA S.A.	-	-	23.446	-
THERMOLITH S.A.	-	-	-	-
SOFIA MED AD	117.862	-	59.423	2.565
Σύνολο	**7.645.122**	**4.888.639**	**3.852.074**	**3.194.589**

Fixed Assets Sales

	01/01-31/12/2021		01/01-31/12/2020	
Company	**Group**	**Company**	**Group**	**Company**
VIOMAL S.A.	-	-	-	-
ELVALHALCOR S.A.	11.500.000	11.500.000	11.713	11.713
Σύνολο	**11.500.000**	**11.500.000**	**11.713**	**11.713**

Other Income

Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company	01/01-31/12/2020 Group	01/01-31/12/2020 Company
SIDENOR STEEL INDUSTRY SA	1.806.124	1.806.124	1.416.046	1.416.046
SOVEL S.A.	1.150	1.150	1.064	1.064
STOMANA S.A	622.466	-	464.983	-
ETIL S.A.	300	300	55	55
ERLIKON WIRE PROCESSING S.A.	307.245	307.245	254.201	254.201
SIDMA Bulgaria S.A.	-	-		6.409
ELVALHALCOR S.A.	1.749.950	1.749.950	351.902	351.902
CORINTH PIPEWORKS S.A.	718.552	718.552	351.371	351.371
TEKA SYSTEMS S.A.	188	188	2	2
HELLENIC CABLES S.A.	-	-	210	210
ETEM SA	220	220	50	50
SIDMA ROMANIA SRL	-	-		6.107
ANAMET SA	24	24	68	68
VIANATT SA	-	-	843	843
FULGOR SA	9.839	9.839	11.700	11.700
ECORESET SA	1.772	1.772	1.124	1.124
ERGOSTEEL S.A.	1.200	1.200	230	230
VEPAL SA	-	-	40	40
SIDEROM STEEL SRL	383.530	-	117.790	-
ANTIMET S.A.	140	140	-	-
ANOXAL S.A.	1.151	1.151	-	-
THERMOLITH S.A.	-	-	-	-
SYMETAL S.A.	-	-	-	-
VIOMAL S.A.	-	-	-	-
Σύνολο	**5.603.852**	**4.597.855**	**2.971.678**	**2.401.421**

Purchases

Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company	01/01-31/12/2020 Group	01/01-31/12/2020 Company
SIDENOR STEEL INDUSTRY SA	500.891	500.891	403.717	403.717
STOMANA S.A	27.764.478	10.500.214	16.449.951	4.466.295
ERLIKON WIRE PROCESSING S.A.	17.722	17.722	17.053	17.053
SIDMA Bulgaria S.A.	-	-		34.968
CORINTH PIPEWORKS S.A.	111.180	111.180	888.426	875.148
SIDMA Romania S.R.L.	-	24.297		-
ELVALHALCOR S.A.	339.658	339.658	165.102	165.102
LESCO LTD	19.276	19.276	12.031	12.031
METALCO BULGARIA S.A.	-	-	-	-
PROSAL TUBES S.A.	-	-	-	-
SIDEROM STEEL SRL	10.213.575	-	2.940.402	-
Σύνολο	**38.966.780**	**11.513.238**	**20.876.682**	**5.974.315**

SIDMA STEEL S.A.

Other Expenses

Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company	01/01-31/12/2020 Group	01/01-31/12/2020 Company
ETIL S.A.	-	-	300	300
SIDMA BULGARIA SA	-	-		155
ELVALHALCOR S.A.	6.538	6.538	7.090	7.090
TEKA SYSTEMS S.A.	83.314	65.279	76.112	60.815
ANTIMET S.A.	95.341	95.341	100.650	100.650
VIEXAL S.A.	1.897	1.897	1.055	1.055
Steelmet Property Services S.A.	6.297	6.297	6.297	6.297
SIDENOR STEEL INDUSTRY SA	268	268	-	-
SIDERAL SHPK	-	-	10.528	10.528
METALCO BULGARIA S.A.	13.721	-	9.744	-
METALIGN	299.641	299.641	298.390	298.390
VIENER SA	645.684	645.684	403.501	403.501
ETEM BULGARIA SA	-	-	-	-
ICME ECAB SA	2.998	-	1.570	-
STEELMET S.A.	-	-	-	-
Σύνολο	**1.155.699**	**1.120.945**	**915.236**	**888.780**

Fixed Assets Purchases

Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company	01/01-31/12/2020 Group	01/01-31/12/2020 Company
TEKA SYSTEMS S.A.	50.057	50.057	34.847	34.847
VITROUVIT SA	2.665	2.665	5.430	5.430
STEELMET S.A.	-	-	1.318	1.318
ETIL S.A.	26.705	26.705	-	-
HELLENIC CABLES S.A.	20.065	20.065	-	-
Σύνολο	**99.491**	**99.491**	**41.595**	**41.595**

Payables

Company	01/01-31/12/2021 Group	01/01-31/12/2021 Company	01/01-31/12/2020 Group	01/01-31/12/2020 Company
SIDENOR STEEL INDUSTRY SA	10.826.574	10.826.574	9.988.060	9.988.060
STOMANA S.A	9.154.593	3.337.918	5.046.828	984.634
ETIL S.A.	32.373	32.373	363	363
ERLIKON WIRE PROCESSING S.A.	1.231.501	1.231.501	1.605.755	1.605.755
SIDMA BULGARIA SA	-	141		141
ELVALHALCOR S.A.	20.365	20.365	19.976	19.976
CORINTH PIPEWORKS S.A.	6.107.221	6.107.221	3.926.705	3.918.364
TEKA SYSTEMS S.A.	41.522	38.039	48.996	42.008
ANTIMET S.A.	49.758	49.758	63.110	63.110
VITROUVIT SA	(78)	(78)	2.954	2.954
Etem Gestamp Aluminium Extrusions	1.876	1.876	1.876	1.876
METALIGN	-	-	(8.118)	(8.118)
VIENER SA	90.474	90.474	40.036	40.036
LESCO LTD	-	-	12.031	12.031
ICME ECAB SA	255	-	166	-
SIDERAL SHPK	-	-	-	-
SIDEROM STEEL SRL	5.774.420	-	3.120.829	-
HELLENIC CABLES S.A.	24.880	24.880	-	-
STEELMET S.A.	-	-	-	-
VIEXAL S.A.	291	291	-	-
Σύνολο	**33.356.026**	**21.761.335**	**23.869.569**	**16.671.190**

Receivables				
	01/01-31/12/2021		01/01-31/12/2020	
Company	Group	Company	Group	Company
SIDENOR STEEL INDUSTRY SA	64.128	64.128	39.991	39.991
SOVEL S.A.	61.403	61.403	87.036	87.036
STOMANA ENGINEERING AD	7.156	-	85.379	-
ETIL S.A.	34.084	34.084	43.524	43.524
ERLIKON WIRE PROCESSING S.A.	14.920	14.920	(41.119)	(41.119)
EPIRUS METALWORKS SA	(82)	(82)	(6.750)	(6.750)
AEIFOROS SA	2.540	-	2.608	2.608
ELVALHALCOR S.A.	737.181	737.181	134.064	134.064
CORINTH PIPEWORKS S.A.	34.999	34.999	70.729	70.729
ANTIMET S.A.	1.280.311	1.280.311	1.344.589	1.344.589
HELLENIC CABLES S.A.	3.919	3.919	4.927	4.927
VIOMAL S.A.	63.124	63.124	64.046	64.046
SIDMA Romania S.R.L.	-	0	0	0
ANAMET SA	6.036	6.036	8.783	8.783
FITCO SA	-	-	6.164	6.164
SIDMA WORLDWIDE (CYPRUS) LIMITED	-	2	837	2
ETEM COMMERCIAL S.A.	5.031	5.031	-	-
SYMETAL S.A.	106.291	106.291	345	345
PROSAL TUBES SA	30	30	30	30
DOJRAN STEEL LTD	-	-	127	127
FULGOR SA	276.604	276.604	422.845	422.845
ECORESET SA	2.975	2.975	14.583	14.583
ERGOSTEEL S.A.	(276)	(276)	2.214	2.214
VEPAL SA	-	-	660	660
ETEM BULGARIA SA	(1)	(1)	(1)	(1)
SOFIA MED AD	44.906	-	2.282	-
ETEM SH.P.K.	(1.066)	(1.066)	(1.066)	(1.066)
ICME ECAB SA	53.156	-	19.962	-
SIDEROM STEEL SRL	328.075	-	39.716	-
SIGMA AD	-	-	-	-
DIA.VI.PE.THI.V. SA	-	-	-	-
ANOXAL S.A.	6.039	6.039	-	-
ATTICA METALIC WORKS S.A.	272.300	272.300	-	-
TEKA SYSTEMS S.A.	1.218	1.218	-	-
Σύνολο	**3.405.000**	**2.969.170**	**2.346.505**	**2.198.331**

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

	Group		Company	
	1.1-31.12.2021	1.1-31.12.2020	1.1-31.12.2021	1.1-31.12.2020
Management Fees (short-term)	807.617	561.961	547.865	406.259
Board of Directors fees (short-term)	63.617	151.081	45.800	134.400
Total	**871.234**	**713.042**	**593.665**	**540.659**

C.8 Post Balance Sheet Events

There are no other events after 31.12.2021 that significantly affect the financial situation and the results of the Group and the Company except the following:

- **Conflict between Ukraine and Russia**

Regarding the effects of recent developments in Ukraine and Russia on the Group's and the Company's operations, we would like to report that in 2021:

- The turnover percentage related to sales of imported products from the above countries was approximately 6.5% of the total.
- The product acquisition percentage from the above countries concerned approximately 6.8% of the Company's total imports.
- The Company's assets do not have any exposure regarding the above countries.

The Company and the Group have a broad dispersion of suppliers from various countries, thus ensuring smooth operation of the supply chain. Many steel producers, however, depend to a considerable degree on raw material supplies from some regions of Ukraine and Russia. Currently, it is impossible to measure the impact of the recent developments in Ukraine and Russia on the operations of our suppliers and - consequently - on the respective operations of the Company and the Group. However, increases in energy and inflation could have indirect effects, increasing their operating costs.

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.

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 2021.

Internal Operation Regulation - Code of Corporate Governance

On 17th July 2020, Law 4706/2020 was published at Government Gazette A' 136/17-07-2020 ("Corporate governance of societies anonymes, modern capital market, incorporation into Greek legislation of Directive (EU) 2017/828 of the European Parliament and of the Council, measures in implementation of the Regulation (EU) 2017/1131 and other provisions), the provisions of articles 1 – 24 of which law entered into force twelve (12) months upon its publication at the Government Gazette, and in particular on 17.07.2021, pursuant to article 92(3) of such law, unless otherwise specified in the other provisions. By this law, changes were applied in the applicable legal framework for corporate governance and new provisions were introduced.

The Company, in compliance with the new legal framework, complying in parallel with the existing framework as set out in Law 4449/2017 and Law 4548/2018, proceeded by virtue of its Board of Directors' Decision dated 24.05.2021 to the revision, amendment and replacement of its internal Operation Regulation for its adaptation to the provisions of Law 4706/2020. In the said Regulation, mainly the organizational structure of the Company, its Units and the Committees, their subject, the policies and procedures which are applied by the Company, the characteristics of the Internal Control System of the Company (ICS) etc. are included, while the regulation has been uploaded to 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 passage b of Law 4706/2020.

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 recognised by the Board of Directors of the Hellenic Capital Market Commission at its 916th/7.6.2021 meeting as National Recognised 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/2021/11/ΕΛΛΗΝΙΚΟΣ_ΚΩΔΙΚΑΣ_ΕΤΑΙΡΙΚΗΣ_ΔΙΑΚΥΒΕΡΝΗΣΗΣ_ΕΣΕΔ_2021.pdf).

1.2 Deviations from the Greek Corporate Governance Code and justification thereof. Special provisions-practices of the Code applicable to listed companies-that the Company does not apply and explanation of the reasons of non-application

The Company firstly certifies by this statement that it applies faithfully and strictly the provisions of Greek legislation which formulate the minimum requirements that must be met by any corporate governance code in accordance with article 17 of Law 4706/2020 and Decision no. No. 2/905/3.3.2021 of the Board of Directors of the Hellenic Capital Market Commission, implemented by the Company, the shares in which are traded only in organized market in Greece.

The said minimum requirements are incorporated on the date of the present statement in the above Code, which the Company has adopted and applies. However, apart from the minimum requirements, the Code includes a series of special practices from which any deviation or non-application is permitted on a case-by-case basis.

The Company deviates or does not apply certain provisions of the Code in full regarding "Special practices for listed companies", to the extent permitted under the applicable legislation. Below the said deviations are referred in detail with reference to the numbering of the Code for the relevant special practices at the end of each paragraph.

(1) Role and required capacities of the Chair of the Board of Directors
The Board of Directors does not appoint an independent Vice Chair from its independent members, but a non-executive Vice Chair, as the Chair of the Board of Directors is, on the one hand non-executive member, and on the other hand a person different from the Chief Executive Officer (Part A, 2.2.21 and 2.2.22).

(2) Succession of the Chief Executive Officer
The Company does not have a succession plan of the Chief Executive Officer as it does not have adequate number of experienced executive members of the Board of Directors, who could replace the existing Chief Executive Officer at any time (Part A, 2.3.4).

(3) Operation Regulation of the Board of Directors
The Board of Directors has not adopted a separate Operation Regulation, describing at least the way that it meets and decides, and the procedures that it follows, as well as the way that it meets and decides and the procedures that it follows are regulated in detail in the Internal Operation Regulation of the Company and Law 4548/2018 in a way that does not deviate from the principles of the Code (Part A, 1.15 and 1.16).

(4) Suitability Criteria of the members of the Board of Directors

- The regulations of the Company do not provide that the diversity criteria concern, in addition to the members of the Board of Directors, the senior and/or senior executives with specific representation goals by gender, as well as timeframes for achieving such goals. Under the Suitability Policy of the Company, the Company applies a diversity policy aiming at promoting an appropriate level of differentiation at the Board of Directors and a diverse group of members. Through the accumulation of a wide range of qualifications and skills at 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 Suitability Policy is included/referred at the diversity policy, in order to be ensured that it has been taken into consideration at the appointment of the members of the Board of Directors. The adequate representation per gender at 25% of the total number of the members of the Board of Directors is explicitly provided for, based on the current ten-members Board of Directors the minimum number of men or women is two (2) and no exclusion due to gender, race, color, ethnic or social origin, religion or belief, property, birth, disability, age or sexual orientation is applied at all. The Company processes and investigates the terms and conditions of further specialization and extension of the scope of application of these diversity criteria to Company's executives as well as the relevant objectives and timeframe for the implementation of any relevant changes in the Suitability and Reliability Policy, although it is considered that no risk due to such deviation exists, for the time period that it is in place (Part A, 2.2.15).

- The selection criteria for the members of the Board of Directors do not require that the Board of Directors, collectively, understands and manages issues related to the environment, the social responsibility and governance (ESG19), within the framework of the strategy that it creates, as the company has no relevant legal obligation (Part A, 2.2.16).
- Although the suitability policy includes explicit reference to the obligations of the members of the Board of Directors to devote sufficient time to the performance of their duties, there are no restrictions on the total number of positions that the members of the Board of Directors may hold in other companies. It is noted that to date there has been no inability of the members of the Board of Directors to devote the necessary time required by their position, as each candidate member of the Board of Directors is required to notify the Company prior to its election, the number of its positions as member of the Board of Directors in other companies, the resulting capacities that it holds at the same time as well as other professional or personal commitments and conditions, which are thoroughly evaluated before its nomination and election (Part A, 2.2.17).

(5) Operation of the Board of Directors

(i) There is currently no provision for the support of the Board of Directors in the exercise of its works by a competent, specialized and experienced company secretary, as its basic duties are replenished by other services of the Company (Part A, 3.2).

(ii) There is no need for the meetings to be carried out on a regular basis between the Chair of the Board of Directors and its non-executive members to discuss the performance and remuneration of the latter, as all relevant issues are discussed with the presence of all members of the Board of Directors (Part A, 1.13).

(iii) There is no provision for the existence of a program for the continuous information and training of the members on issues concerning the company, as persons with competent and proven experience and organizational/administrative skills are nominated for election as members of the Board of Directors. However, the new members of the Board of Directors receive introductory information on matters concerning the Company and often come in contact with the Company's executives (Part A, 3.3.13).

(6) Level and structure of remuneration

(i) The general remuneration of the Chair of the Board of Directors, the Chief Executive Officer and the members of the Board of Directors, executive or not, is approved by the ordinary General Meeting of the shareholders and is sufficiently disclosed at the financial statements under IAS 24. No publication of remuneration report is made in the corporate governance statement (Part E).

(ii) There is no provision that the options mature within a period of not less than three (3) years from the date of their granting to the executive members of the Board of Directors, as the Company has not established a relevant program (Part A, 2.4.13).

(iii) The contracts of the executive members of the Board of Directors do not contain any provision that the Board of Directors may demand the return of all or part of the bonus awarded, due to breach of contract terms or inaccurate financial statements of previous years or generally based on incorrect financial data used for the calculation of such bonus, because no bonuses are provided for in the Company's contracts with the executive members of the Board of Directors (Part A, 2.4.14).

(iv) The additional remuneration of the members of the Board of Directors who participate in committees for reasons of transparency and information are not displayed separately in the remuneration report and also in their approval by the general meeting, because the members of the Board of Directors, to the extent remunerated, receive a fixed salary remuneration regardless of their participation or not in committees of the Board of Directors (Part A, 2.4.4).

C.9.2 Corporate governance practices implemented by the Company in addition to the legal provisions

The Company implements faithfully and strictly the provisions of the legal framework on corporate governance. There are currently no practices applied in addition to the above provisions.

C.9.3. Main characteristics of the Internal Control and Risk Management Systems in relation to the Procedure of Preparation of Financial Statements and Financial Reports.

The Internal Control and Risk Management System of the Company in relation to the procedure of preparation of the financial statements and financial reports includes safeguards and control mechanisms at various levels within the Organization as described below:

(a) Adequacy of Internal Control System

The Management has designed and performs continuous supervisory activities, which are integrated in the operation of the Company, and which ensure that the Internal Control System maintains its effectiveness over time.

The Board of Directors ensures the adequate and efficient operation of the Company's internal control system, as well as that the functions that constitute the internal control system are independent of the business sectors they control, and that they have the appropriate financial and human resources, as well as the powers for their effective operation. The Company also conducts periodic individual evaluations regarding the suitability of the Internal Control System, which are implemented mainly through the Internal Audit Unit.

The Company has in place an Internal Audit Unit in accordance with article 16 of Law 4706/2020, which is an independent organizational unit within the Company, to monitor and improve the operations and policies of the Company regarding its internal control system. The Internal Audit Unit mainly monitors, controls, and evaluates the implementation of the operating regulations and the Internal Control System, especially in terms of adequacy and correctness of the provided financial and non-financial information, risk management, regulatory compliance and the Corporate Governance Code adopted by the Company.

The Internal Audit Unit informs in writing at least once every three months the Audit Committee on the results of its work on the identification and treatment of the most important risks and the effectiveness of the Internal Control System, which in turn submits a relevant report to the Company's Board of Directors. The Head of the Internal Audit Unit is appointed by the Board of Directors of the Company, is full-time and exclusively employed, hierarchically subject to the Chief Executive Officer directly and is supervised by the Audit Committee.

In performing its duties, the Head of the Internal Audit Unit is entitled to become aware of any book, archive or document of the Company and to have full and unhindered access to any Department/Service of the Company and, as the case may be, of its subsidiaries. The members of the Board of Directors and the executives of the Company must cooperate and provide information to the Head of the Internal Audit Unit and generally to facilitate its works by any means.

The adequacy of the Internal Control System is monitored on a systematic basis by the Audit Committee, which has been established in accordance with article 44 of Law 4449/2017, through two-way communication with the Internal Audit Unit and the Company's Management. In particular:

(i) The Head of the Internal Audit Unit meets at least quarterly with the Audit Committee to discuss matters within its competence, as well as problems that may arise from the internal audits, and submits to the Audit Committee reports, including the most important issues and its proposals regarding the findings and evaluations which it carries out in application of article 16 par. 1 items (a) and (b) of Law 4706/2020.

(ii) The Audit Committee presents and submits together with its observations to the Board of Directors the reports of the Head of Internal Audit as well as its annual report, which concern, among others, the adequacy of the Internal Control System.

(iii) The Management has designed and carries out continuous supervisory activities, which ensure that the Internal Control System maintains its effectiveness over time. In this context, the Company also conducts periodic individual evaluations regarding the suitability of the Internal Control System, which are implemented mainly through the Internal Audit Department. In addition, the quality of the audit work is ensured through "external review" by recognized audit companies at least every three years.

Operation Regulation of the Audit Committee: The Company has in place an Rules of Operation of the Audit Committee in accordance with article 10 par. 4 of Law 4706/2020, article 44 of Law 4449/2017, letter no. 1302/28.04.2017 of the Hellenic Capital Market Commission and covers the composition, the role, the responsibilities and the way of operation and evaluation of the Audit Committee as defined in the said letter as well as the Code.

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

Identification, evaluation, measurement and management of risks: 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.

Planning and monitoring/Budget: 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.

Safeguards for the process of preparing financial statements and financial reports: 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:

Organization - Allocation of Responsibilities: (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.

Procedures for accounting monitoring and preparation of financial statements: (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.

C.9.4. Board of Directors

(a) Composition of the Board of Directors

The current Board of Directors of the Company has ten members (10 members), as elected by the Ordinary General Meeting of 10 June 2021, and consists of the following members:

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.

Gerasimos Vardaramatos - Member of the Board of Directors (Independent Non - Executive Member):

Graduate of the Department of Economic Science 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 (IESOEL). He practiced the profession of chartered accountant from 2012 to 2018 in the company SOL SA. From 2018 until today he works in a multinational consulting company as a person responsible for preparing financial statements based on the International Financial Reporting Standards. He is an Independent Non-Executive Member of the Board of Directors of the Company since June 2021.

Based on the above composition, the Board of Directors consists of three (3) executive and seven (7) non-executive members, of which three (3) are independent members, which the Board of Directors considers maintaining their independence, based on the definitions of the Code.

The term of the new Board of Directors of the Company commences from the day following their election, ie from 11-6-2021 until 10-6-2022, 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 2022 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	MEMBERSHIP
PANAGIOTIS BITROS	BITROS HOLDING S.A. BITROS METALLOYRGIKI S.A. BITROS KATASKEVASTIKI ANONYMI EMPORIKI KAI VIOMIHANIKI ETAIREIA BITROS OPLISMOS SKYRODEMATOS ANONYMI VIOMIHANIKI EMPORIKI KAI TEHNIKI ETAIRIA D.G. VAKONTIOS FOREAS VIOMIHANIKOY PARKOY (VIPA) ASPROPYRGOY NOTIOS TOMEAS ANONYMI ETAIREIA SA	Chairman of the BoD Chairman and Chief Executive Officer Chairman of BoD Chairman of BoD Vice- Chairman of BoD Chief Executive Officer
ANTONIS KARADELOGLOU	SIDMA BULGARIA S.A. SIDMA ROMANIA SRL.	Member Member
MICHAEL SAMONAS	HELLENIC ASSOCIATION OF RISK MANAGERS SIDMA ROMANIA SRL. SIDMA BULGARIA S.A.	Member Member Member
STAVROS GATOPOULOS	BIG SOLAR S.A BITROS METALLOYRGIKI S.A BITROS OPLISMOS SKYRODEMATOS ANONYMI VIOMIHANIKI EMPORIKI KAI TEHNIKI ETAIRIA D.G. VAKONTIOS T.H. ENERGEIAKI ANONYMI ETAIRIA VIOAERIO PELLAS ANONIMI ETAIRIA	Vice-Chairman of BoD and Chief Executive Officer Executive Member of BoD Managing Director Executive Member of BoD Chief Executive Officer Vice- Chairman of BoD

PANAGIOTIS MARIOU	SOVEL S.A. SIDMA STEEL S.A. SIDMA ROMANIA SRL. AEIFOROS EPEXERGASIA METALLON S.A. PR.A.K.SY.S S.A STOMANA ENGINEERING (ex SIGMA IC. S.A.) DOJRAN STEEL DOOEL ΩVI.ENER S.A. ENERGIAKES EPICHERISEIS SOCIETE ANONYME SIDEROM STEEL SRL PORT SVISHTOV WEST S.A. (EX PORT VIDIN NORTH S.A.) JOSTDEX LIMITED (CYPRUS) SIDEBALK STEEL DOO (SERBIA) AEIFOROS BULGARIA S.A. SIDENOR VIOMICHANIKI CHALYVA SOCIETE ANONYME PRAKSYS BG S.A., UIC CPW SOLAR S.A. ALMYROS BUSINESS PARK DEVELOPMENT COMPANY SINGLE MEMBER S.A.	Vice-Chairman of BoD Member Member Vice-Chairman of BoD Member Member Member Member Member Member Member Member Member Member Member Member Member

Senior executives who are not members of the Board of Directors

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 aforementioned 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 also 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, in order 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 of 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 2021, a total of 45 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 2021 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	01/01/2021 - 31/12/2021	45	45	100%
BERNARDOUT DANIIL	Vice Chair of BoD/ Non-Executive Member	01/01/2021 - 10/06/2021	20	13	65%
VICTOR ANDREA PISANTE	Non-Executive Member	01/01/2021 - 10/06/2021	45	43	96%
	Vice Chair of BoD / Non-Executive Member	10/06/2021 - 31/12/2021			
KARADELOGLOU ANTONIOS	Chief Executive Officer/ Executive Member	01/01/2021 - 31/12/2021	45	45	100%
MARIOU NIKOLAOS	Executive Member	01/01/2021 - 31/12/2021	45	45	100%
GATOPOULOS STAVROS	Non-Executive Member	01/01/2021 - 31/12/2021	45	45	100%
SAMONAS MICHAEL	Chief Financial Officer/ Executive Member	01/01/2021 - 31/12/2021	45	45	100%
KONSTANTINOU PANAGIOTIS	Non-Executive Member	10/06/2021 - 31/12/2021	25		0%
MOISES ABRAAM	Independent/Non Executive Member	01/01/2021 - 10/06/2021	20	11	55%
KATSAROS GEORGIOS	Independent/ Non-Executive Member	01/01/2021 - 10/06/2021	20	6	30%
BARDAMARATOS ΓΕΡΑΣΙΜΟΣ	Independent/ Non Executive Member	10/06/2021 - 31/12/2021	25	23	92%
MANOLI VASILEIA	Independent/ Non Executive Member	10/06/2021 - 31/12/2021	25	23	92%
SALAKA EUSTATHIA	Independent/ Non Executive Member	10/06/2021 - 31/12/2021	25	23	92%

(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	5,15%

(f) Evaluation of Members of the Board of Directors

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, on the basis of 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.

For the year 2021, the Company has carried out an informal evaluation of the members of the Board of Directors and its Committees and will apply the above evaluation procedure provided for in the Suitability and Reliability of Members of the Board of Directors Policy for the year 2022.

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 in order to support the Board of Directors with its duties relating to financial reporting, internal audit and the supervision of the statutory audit.

The Audit Committee of the Company was elected by the Extraordinary General Meeting of the Company's Shareholders of 10th June 2021, in accordance with the provisions of article 44 of Law 4449/2017, as in force, 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 and its composition is 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

In August 2017 the Operation Regulation of the Audit Committee was established by which the role, the election procedure and the convening and meetings procedure were (among others) set out.

All the elected members of the Audit Committee possess sufficient knowledge in the various areas of the activity of the Company. In addition, the majority of the elected members meet the criteria of independence of article 9 of Law 4706/2020, while at least one member, Mr. Gerasimos Vardaramatos, has sufficient knowledge in auditing or accounting in compliance with by article 44 of Law 4449/2017. The Audit Committee is referred to the Board of Directors

The term of the Audit Committee coincides with the term of the Board of Directors of the Company, ie it is one (1) year, and is automatically extended until the first Ordinary General Meeting following expiration of the term of its members.

(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 2021, 11 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
MOISES ABRAAM	Chair	01/01/2021-10/06/2021	6	6	100%
KATSAROS GEORGIOS	Member	01/01/2021-10/06/2021	6	5	83%
KONSTANTINOU PANAGIOTIS	Member	01/01/2021-10/06/2021	6	6	100%

BARDARAMATOS GERASIMOS	Chair	10/06/2021-31/12/2021	5	5	100%
MANOLI VASILEIA	Member	10/06/2021-31/12/2021	5	5	100%
KONSTANTINOU PANAGIOTIS	Member	10/06/2021-31/12/2021	5	4	80%

In particular, the Audit Committee during the time period from 01.01.2021 to 31.12.2021:

- Was informed by the Certified Auditors about the audit planning, the schedules, audit approach, audit scope, the method of determining the substantial size and the most important audit issues for the annual financial statements of 2020 and the semi-annual financial statements of 2021 (corporate and consolidated).
- Audited the financial statements for the year 2020 and the first half of 2021 before their publication (corporate and consolidated).
- Examined the Supplementary Report of the Certified Auditors for the annual financial statements of 2020 (corporate and consolidated).
- Audited the independence of the Certified Auditors and the nature of the non-audit services provided to the Company in relation to level of their remuneration.
- Approved the audit plan of the Internal Audit unit for the year 2021 and for the year 2022.
- Cooperated with the Company's Internal Auditor, discussed the findings and conclusions from its audit reports.
- Presented together with its observations to the Board of Directors of the Company the most important issues from the audits of the Internal Audit unit.
- Monitored the implementation of the annual audit plan for 2021, through the relevant reports of the Internal Auditor of the Company.
- Approved the updated Operation Regulation.

(d) Self-assessment of the Audit Committee

In accordance with the Regulation, the Audit Committee proceeds to self-assessment on an annual basis and takes measures that considers required, for the improvement of its effectiveness. For the year 2021, the self-assessment took place on 28 March 2022.

Report on the activities of the Audit Committee for the financial year 2021

Aspropyrgos, 8 April 2022

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"), 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.

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 shall consider 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. The majority 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.
The composition of this Audit Committee is 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 were appointed by the new Board of Directors, at the meeting held on 10 June 2021, as authorized by the Regular General Meeting of Shareholders held on the aforementioned date.

The following members have resigned from the Committee:

- Abraham Moses, Chairman
- Abraham Moses, Member

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 11 times during the financial year 2021 (01.01.2021 - 31.12.2021). 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
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 in order 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 2021 annual statutory audit plan prior to its implementation	We assessed the statutory audit plan and ensured that it covered the most significant audit areas, taking into account 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.
- 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 have an effect on the Company's financial statements and significant judgements and estimates made by the management in their preparation.	In particular, 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 reviewed and assessed the accounting treatment of the restructuring of the Company's debt obligations under IFRS 9, 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 in order 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 on the basis of the accounting principles followed.

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) Evaluating 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) Evaluating 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) Evaluating the existence or non-existence of constraints on the operations of the Internal Audit Unit, as well as the independence it should have in order to carry out its operations without obstacles,
4) Reviewing any disclosed information with respect to internal control system and the Company's principal risks and uncertainties with respect to financial reporting,
5) Evaluating 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,
6) conducting 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) monitoring the effectiveness of the internal control systems through the work of the Internal Audit Unit and the operations of the Statutory Auditor,
8) reviewing the management of the Company's main risks and uncertainties and periodically reviewing them, evaluating the methods used by the Company to identify and monitor risks, addressing the main risks and uncertainties through the internal control system and the Internal Control Unit, and disclosing them in the published financial information in a proper manner. The main risks for 2022, taking into account the impact and risks of the COVID-19 coronavirus pandemic, are as follows:
- Macroeconomic environment
- Credit risk
- Interest rate risk
- Liquidity risk
- Risk of fluctuating prices of raw materials and
- Foreign exchange risk

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

Statutory Auditors evaluation and selection procedure

The Audit Committee appointed the same Auditing Firm for FY 2021 and submitted the proposal to the Annual General Meeting of Shareholders. About the auditors, the Audit Committee conducted:

a) monitoring their operations in the context of the statutory audit of the financial statements for the FY 2021,
b) evaluating their performance and independence, in accordance with paragraph (a), (b) evaluating their performance and independence, in accordance with paragraph (c), (d) evaluating their performance and independence, in accordance with paragraph (e), (e) evaluating their performance and independence, in accordance with paragraph (f). 3e of Article 44 of Law 4449/2017, Law 4706/2020 and paragraph 3e of Article 44 of Law 4449/2017, as well as paragraph 3e of Law 4706/2020. 6 of Article 26 and Articles 5, 6, 21, 22, 23, 23, 26 and 27 of Regulation (EU) No 537/2014.
c) confirming 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 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.

Market

The Company aims to achieve the optimal and complete customer satisfaction and invests in research and development, in order 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

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 2021, the Remuneration and Nomination Committee held one (1) meeting with the presence of all of its members.

SIDMA STEEL S.A.

Participation of RNC members to the meetings of the Committee.
Within 2021 totally 1 meeting 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	10/06/2021-31/12/2021	1	1	100%
MANOLI VASILEIA	Member	10/06/2021-31/12/2021	1	1	100%
KONSTANTINOU PANAGIOTIS	Member	10/06/2021-31/12/2021	1	1	100%

In particular, the Remuneration and Nomination Committee during the period from 10.06.2021 to 31.12.2021:

- was formed into a body and approved its operating regulation, which was posted on the Company's website.
- Made proposals to the Board of Directors regarding the remuneration of persons who fall within the scope of the remuneration policy, in accordance with article 110 of Law 4548/2018.

Actions Report of the Remuneration and Nomination Committee to the shareholders of the G.M. and the members of the BoD of the Company SIDMA SA for the year 2021

"Actions Report of the Remuneration and Nomination Committee 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 2021 (10.6.2021-31.12.2021).

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:
a) 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

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

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 Member or by the Board of Directors and is convened in a meeting by its Chair.

During the year 2021, the Remuneration and Nomination Committee held one (1) meeting with the presence of all of its members.

5. Actions of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee during the time period from 10.06.2021 to 31.12.2021:

- *Was incorporated and approved its operating regulation, which was posted and is posted on the Company's website.*
- *Reviewed the remuneration policy as well as the suitability and reliability policy of the Members of the Board of Directors and ascertained that they are in compliance with the provisions of Law and no amendment is required to be proposed to the next General Meeting.*

For the meetings of the Committee minutes were kept, which were approved and signed by all of its members.

Aspropyrgos, Attiki, 06/04/2022

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 aforementioned 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 claims;
- 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, in particular 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. Until the publication of the annual financial statements and the corporate governance declaration, the evaluation report of the Internal Control System has not been completed, as pursuant to the decision no. 1/891/30.09.2020, as amended with the no. 2/917/17.06.2021 of the Board of Directors of the Hellenic Capital Market Commission, the first evaluation must be completed by 31 March 2023 with a reference date of 31 December 2022 and a reference period from the entry into force of article 14 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. In order 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:

<u>Economic Development and Corporate Governance</u>: 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.

<u>Market</u>: 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.

<u>Human Resources - Health and Safety at Work</u>: 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.

<u>Environment</u>: 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.

<u>Local Community</u>: 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 31.12.2021, 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 2021, the Company's shareholding structure was the following:

SHAREHOLDERS	Shareholder's book No. of shares	31/12/2021 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%
ΣΥΝΟΛΟ	**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 2021, 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.

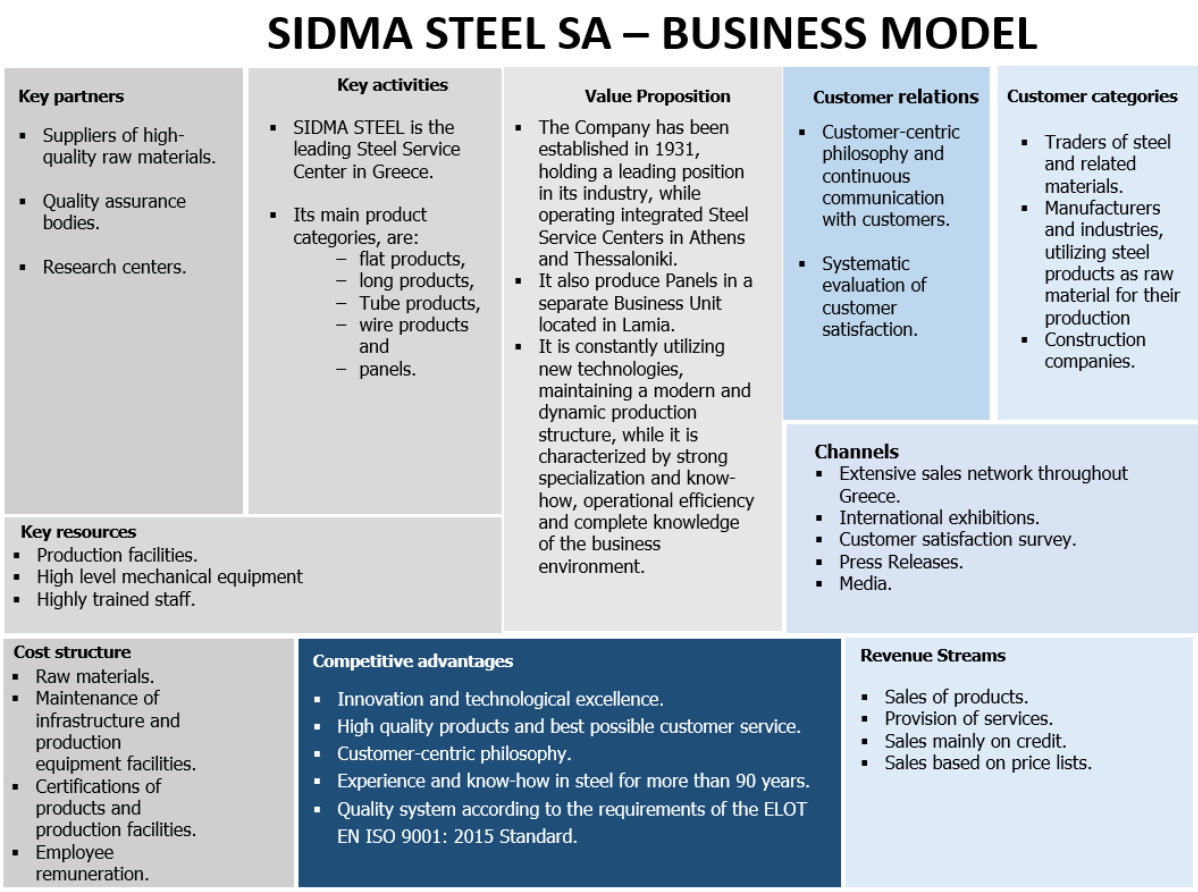
(j) Agreements regarding compensation of members of the Board of Directors or personnel in case of resignation, termination of their employment agreement without an essential cause or expiration of their term/ agreement due to public tender offer

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 centers 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 in order 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 aforementioned context, has established specific policies and implements appropriate management systems and relevant procedures that determine the manner in which 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

Identification of material issues
The Company has assessed and prioritized the most important issues that are associated with its activity and are directly related to the stakeholder groups. The aforementioned procedure was based on the Global Reporting Initiative (GRI Standards) guidelines, the Sustainability Accounting Standards Board (SASB) conceptual framework and the Athens Stock Exchange ESG Reporting Guide (2019 edition). Through this procedure the Company develops and updates its action plan, and it also determines the contents of the annual Sustainable Development Report. As a next step, the Company has set specific goals and monitors relevant key performance indicators (KPIs). In the context of achieving said indicators and therefore the goals, the Company develops and implements relevant responsible operation actions.

SIDMA STEEL S.A.'s 2021 Sustainable Development Report includes a detailed presentation of material issues, relevant key performance indicators and their correlation to the United Nations Sustainable Development Goals (Agenda 2030). The Sustainable Development Report is available at the Company's website: https://sidma.gr/el/

Labor and Social issues

The Company constantly ensures a safe and meritocratic work environment and puts human resources in the center 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.

Key human resources figures

Personnel by geographical region of origin	2020	2021
Total Employees	**163**	**159**
Athens	*80*	*78*
Lamia	*27*	*27*
Thessaloniki	*56*	*54*
Percentage of full-time employees	**100%**	**100%**
Hires	**6**	**12**

Personnel by gender and age category 2021	<30	30-50	51+
Men	5	68	60
Women	1	16	9
Total	**6**	**84**	**69**

Personnel by gender and hierarchical rank 2021	Men	Women	Total
Board of Directors	8	2	**10**
Senior Executives	10	1	**11**
Administrative Employees	79	25	**104**
Workers	44	0	**44**
Total	**133**	**26**	**159**

Management of the Covid-19 pandemic

From the beginning of the pandemic the Company responded immediately, prioritizing the protection of the health and safety of its employees and partners and developing initiatives and new regulations, in full compliance with the government's instructions. The framework of actions for the limiting the spread of the pandemic implemented by the Company applies to all employees and external partners and is implemented in all facilities. Specifically, the Company implemented the following actions:

- Performance of preventive PCR tests by specialized unit for all employees.

- Establishment of permanent communication channels, by email and personal contact, for receiving updates regarding the course and development of the pandemic and the measures for the prevention and management of the spread of the virus taken by the Company.
- Changes in the workplace, such as maximization of the distance between desks and installation of special partitions and distribution of the required sanitary material (antiseptics, surgical masks) to all employees in all facilities.
- Provision of the necessary resources (hardware and internet communication upgrade) to enable remote work.
- Establishment of a pandemic protocol for the management of a case on the premises with a process of tracking contacts and other measures.

Lastly, the Company promptly adopted and implemented all the necessary measures in order to prevent the spread of the coronavirus (mandatory use of mask, staff temperature measurements, disinfection at headquarters and production facilities, etc.).

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.

Average training hours per gender and rank 2021			
	Men	**Women**	**Total**
Board of Directors	8	10	**8**
Senior Executives	3	15	**4**
Administrative Employees	7	14	**9**
Workers	11	0	**11**
Total	**8**	**14**	**9**

During 2021, the Company conducted 1,465 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 Management Officers, who are all evaluated on an annual basis.

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 labor rights, in order 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 in order 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	2020	2021
Lost Time Incident Rate (LTIR) (1)	6,4	0
Lost Time Incidents Severity Rate (LTISR) (2)	205	0
Absenteeism Rate (AR) (3)	0.75%	0.78%
Incidents (Number of employee incidents)	2	0
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.

Electricity consumption

SIDMA STEEL S.A.'s energy needs are covered with electricity from the national network and the renewable energy systems (photovoltaic) installed on the roof of the production facilities in Thessaloniki and Aspropyrgos, Attica.

	2020	2021
Electricity consumption (MWh)	**2,548**	**2,591**

SIDMA STEEL S.A.

Thermal energy consumption

The thermal energy consumed in the Company's facilities originates from natural gas, oil and LPG, and is directly related to the operation of the equipment of its production facilities. The consumption of thermal energy in 2021 amounted to 1,488 MWh.

Atmospheric emissions

The Company, aiming to reduce carbon dioxide emissions and mitigate climate change, makes a substantial effort to reduce the atmospheric emissions caused by its operation. In this context, it records both direct and indirect CO2 emissions and monitors its performance closely in order to implement appropriate measures for their reduction.

	2020	2021
Total Carbon Emissions (tn CO_2/tn product)	**1,353**	**1,422**

Note: The calculation of indirect CO_2 emissions for 2020, 2021, used the 2020 rates of the European Residual Mixes 2020, AIB.

Waste management

The Company implements a dedicated waste management procedure in order to reduce its volume. It is worth noting that most of the waste is recycled or forwarded for recovery (energy or other use), whereas the Company collaborates exclusively with appropriately licensed partners for the management of every type of waste.

	2020	2021
Total quantity of waste (tn)	**1,569.9**	**1,136.83**
Recycling (%)		
Hazardous waste	49%	62%
Non-hazardous waste	93%	96%

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
- Labor 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.

Number of evaluated vendors*	**2020**	**2021**
Number of vendors evaluated during the year	320	720
Number of vendors evaluated with environmental criteria	320	593
Number of vendors evaluated with labor and social criteria	50	55

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, in order to continuously monitor safety parameters and potential occupational hazards. Moreover, the Company ensures the provision of continuous training and updates in order 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 ultimate 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 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.

NOTE

The 2021 non-financial indicators presented in this report follow the Sustainability Reporting Guidelines of the Global Reporting Initiative (GRI Standards). Said indicators were selected based on their relevance to SIDMA's activities (pursuant to the materiality analysis conducted by the Company). Detailed information regarding the performance in sustainable development matters and the Company's responsible operation actions and activities will be presented in the annual Sustainable Development Report 2021, which will be made available at the Company's website (https://sidma.gr/el/).

Aspropyrgos, Attiki, 08 April 2022

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 2021

Amounts in EURO		Group		Company	
			REVISED		REVISED
Assets	Notes	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Non Current Assets					
Tangible Assets	8.1	42.728.083	43.004.055	31.825.585	31.747.592
Intangible assets	8.2	523.102	503.520	103.164	79.603
Investments in subsidiaries	8.3	0	0	18.943.116	11.175.716
Investments in associates	8.4	0	12.530.000	0	12.530.000
Other non current assets	8.5	74.953	80.655	70.108	76.531
		43.326.137	**56.118.230**	**50.941.973**	**55.609.442**
Current Assets					
Inventories	8.6	42.095.202	18.471.851	28.439.472	13.730.821
Trade receivables	8.7	54.937.180	48.311.383	47.826.597	43.093.143
Other receivables	8.8	8.018.234	3.871.341	7.439.384	3.474.284
Cash and cash equivalents	8.9	12.724.447	16.742.221	11.430.821	15.748.471
		117.775.064	**87.396.796**	**95.136.275**	**76.046.719**
Total Assets		**161.101.201**	**143.515.026**	**146.078.248**	**131.656.161**
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	27.820.123	27.475.282	23.322.637	23.060.222
Other Reserves		-46.606.341	-72.200.775	-30.489.630	-51.021.603
Total Shareholders Equity of the mother company		12.845.782	-13.093.492	24.465.007	3.670.619
Non-controlling interests		0	0	0	0
Total Shareholders Equity		**12.845.782**	**-13.093.492**	**24.465.007**	**3.670.619**
Liabilities					
Non Current Liabilities					
Long-term loans	8.12	64.012.416	8.407.186	51.880.144	1.263.191
Grants for investments in fixed assets	8.13	26.242	68.166	26.242	68.166
Deferred Tax Liabilities	8.14	6.902.949	4.299.253	6.663.230	4.151.268
Provision for Retirement benefit obligation	8.15	638.502	631.128	632.866	595.162
Total Non-Current Liabilities		**71.580.110**	**13.405.733**	**59.202.482**	**6.077.788**
Current Liabilities					
Trade Payables	8.16	49.642.947	31.875.442	38.136.132	24.454.017
Short-term loans	8.12	13.408.286	52.867.015	12.517.778	39.959.357
Current installments of long-term loans	8.12	4.949.281	53.877.343	3.822.833	53.167.720
Other Payables	8.17	5.529.628	4.582.984	4.911.450	4.326.660
Income tax and duties	8.26	3.145.167	0	3.022.567	0
Total Current Liabilities		**76.675.309**	**143.202.785**	**62.410.759**	**121.907.754**
Total Liabilities		**148.255.419**	**156.608.518**	**121.613.240**	**127.985.541**
Total Equity and Liabilities		**161.101.201**	**143.515.026**	**146.078.248**	**131.656.161**

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

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 2021

Amounts in EURO	Notes	Group		Company	
		1.1 - 31.12.2021	**REVISED 1.1-31.12.2020**	**1.1 - 31.12.2020**	**REVISED 1.1-31.12.2020**
Turnover (sales)	**0,00**	226.409.561	133.254.677	150.068.051	93.884.791
Cost of Sales	**8.18**	-191.745.882	-119.635.792	-123.954.147	-82.521.318
Gross Profit		**34.663.680**	**13.618.885**	**26.113.903**	**11.363.473**
Other income	**0,00**	6.340.761	5.122.012	4.887.851	4.068.649
Administrative Expenses	**8.20**	-4.178.091	-4.317.845	-2.957.014	-3.335.066
Distribution/Selling Expenses	**8.21**	-10.961.386	-10.128.320	-8.713.069	-8.060.724
Other expenses	**8.22**	-320.560	-177.193	-308.594	-138.316
Operating Profit (EBIT)		**25.544.405**	**4.117.539**	**19.023.077**	**3.898.015**
Finance Costs (net)	**0,00**	7.135.870	-4.929.942	8.300.641	-3.549.513
Income from investing operations	**8.24**	-962.372	-33.161	-962.372	-33.161
Profit/(Losses) from the revaluation of assets in fair values	**8.25**	0	53.231	0	53.230
Profit before taxation		**31.717.903**	**-792.333**	**26.361.346**	**368.571**
Less: Income Tax Expense	**0,00**	-6.097.772	34.410	-5.804.079	124.785
Profit/(loss) after taxation for continued operations (a)		**25.620.131**	**-757.923**	**20.557.266**	**493.356**
Attributable to:					
Shareholders of the mother Company		25.620.131	-757.923		
Non-controlling interests		0	0		
		25.620.131	**-757.923**		
Basic earnings (losses) after tax per share	**0,00**	***1,8863***	***-0,0558***	***1,5135***	***0,0363***
Revaluation of assets in fair values	**0,00**	0	6.516.238	0	4.876.339
Actuarial gain/losses	**0,00**	-32.924	-19.224	-32.429	-20.343
Deferred Taxation	**8.15**	269.642	-1.358.463	269.593	-1.165.439
Amounts reclassified to the Income Statement at a later date					
Exchange differences		82.426	155.132	0	0
Other Comprehensive Income after taxes	**8.13**	319.144	5.293.683	237.164	3.690.557
Total Comprehensive Income after taxes		**25.939.274**	**4.535.760**	**20.794.430**	**4.183.913**
Attributable to:					
Shareholders of the mother Company		25.939.274	4.535.760		
Non-controlling interests		0	0		
		25.939.274	**4.535.760**		

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

D.3 Statements of Changes in Group's Equity

SIDMA STEEL S.A.
Consolidated Statement of changes in net equity for the period from 1st January to 31st December 2021

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 01.01.2020	**13.752.000**	**9.875.000**	**12.688.604**	**9.094.714**	**-54.694**	**-71.262.075**	**-25.906.452**	**0**	**-25.906.452**
IFRS 9 adjustments	0	0	0	0	0	272.198	272.198	0	272.198
Net Equity Balance 0n 01.01.2020 after adjustments	**13.752.000**	**9.875.000**	**12.688.604**	**9.094.714**	**-54.694**	**-70.989.876**	**-25.634.253**	**0**	**-25.634.253**
Share Capital Increase due to merge	**4.584.000**	**3.421.000**	**0**	**0**	**0**	**0**	**8.005.000**	**0**	**8.005.000**
Revised Profit	**0**	**0**	**0**	**0**	**0**	**-757.922**	**-757.922**	**0**	**-757.922**
Other Comprehensive Income									
Revaluation of assets in fair values	0	0	0	6.516.238	0	0	**6.516.238**	0	**6.516.238**
Actuarial gain/losses	0	0	0	0	0	-19.224	-19.224	0	-19.224
F.X. Differences	0	0	0	438.524	155.132	-438.524	155.132	0	155.132
Deferred Taxation	0	0	0	-1.363.234	0	4.771	-1.358.463	0	-1.358.463
Other Comprehensive Income after taxes	**0**	**0**	**0**	**5.591.528**	**155.132**	**-452.977**	**5.293.683**	**0**	**5.293.683**
Total Comprehensive Income after taxes	**0**	**0**	**0**	**5.591.528**	**155.132**	**-1.210.899**	**4.535.760**	**0**	**4.535.760**
Net Equity Balance on 31.12.2020	**18.336.000**	**13.296.000**	**12.688.604**	**14.686.241**	**100.438**	**-72.200.775**	**-13.093.492**	**0**	**-13.093.492**
Net Equity Balance on 01.01.2021	**18.336.000**	**13.296.000**	**12.688.604**	**14.686.241**	**100.438**	**-72.200.775**	**-13.093.492**	**0**	**-13.093.492**
Period result	**0**	**0**	**0**	**0**	**0**	**25.620.131**	**25.620.131**	**0**	**25.620.131**
Other Comprehensive Income									
Actuarial gain/losses	0	0	0	0	0	-32.924	-32.924	0	-32.924
Exchange differences and other adjustments other than results	0	0	0	-43	82.426	43	82.426	0	82.426
Income taxes related to items of other comprehensive income	0	0	0	262.458	0	7.184	269.642	0	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	**0**	**0**	**0**	**262.415**	**82.426**	**25.594.434**	**25.939.274**	**0**	**25.939.274**
Net Equity Balance on 31.12.2021	**18.336.000**	**13.296.000**	**12.688.604**	**14.948.656**	**182.863**	**-46.606.341**	**12.845.782**	**0**	**12.845.782**

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

D.4 Statements of Changes in Company's Equity

SIDMA STEEL S.A.
Statement of changes in net equity for the period from
1st January to 31st December 2021

Amounts in EURO	Company				
	Share Capital	**Share Premium**	**Reserves**	**Retained Earnings**	**Total Equity**
Net Equity Balance on 01.01.2020	**13.752.000**	**9.875.000**	**18.915.680**	**-51.333.173**	**-8.790.493**
IFRS 9 adjustments	0	0	0	272.198	272.198
Net Equity Balance 0n 01.01.2020 after adjustments	**13.752.000**	**9.875.000**	**18.915.680**	**-51.060.974**	**-8.518.294**
Share Capital Increase due to Merge	**4.584.000**	**3.421.000**	**0**	**0**	**8.005.000**
Revised Period result	**0**	**0**	**0**	**493.356**	**493.356**
Other Comprehensive Income					
Revaluation of assets in fair values	0	0	4.876.339	0	4.876.339
Actuarial gain/losses	0	0	0	-20.343	-20.343
Exchange differences and other adjustments other than results	0	0	438.524	-438.524	0
Income taxes related to items of other comprehensive income	0	0	-1.170.321	4.882	**-1.165.439**
Other Comprehensive Income after taxes	**0**	**0**	**4.144.542**	**-453.984**	**3.690.557**
Total Comprehensive Income after taxes	**0**	**0**	**4.144.542**	**39.371**	**4.183.913**
Net Equity Balance on 31.12.2020	**18.336.000**	**13.296.000**	**23.060.222**	**-51.021.603**	**3.670.619**
	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
Period results	**0**	**0**	**0**	**20.557.266**	**20.557.266**
Other Comprehensive Income					
Actuarial gain/losses	0	0	0	-32.429	-32.429
Exchange differences and other adjustments other than results	0	0	-43	0	-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**

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

D.5 Cash Flows Statements

SIDMA STEEL S.A. Cash Flow Statement for the period from 1st January to 31st December 2021				
Amounts in EURO	Group		Company	
		REVISED		REVISED
	1.1 - 31.12.2021	1.1-31.12.2020	1.1 - 31.12.2021	1.1-31.12.2020
Operating Activities				
Profit before taxation	31.717.903	-792.333	26.361.346	368.571
Adjustments for:				
Depreciation & amortization	1.616.218	2.276.180	1.183.354	1.771.810
Depreciation of granted assets	-41.924	-40.930	-41.924	-40.930
Provisions	622.913	82.626	618.543	42.325
Exchange Differences	-83.364	-136.986	0	0
Income and expenses from investing activities	962.187	-25.068	962.381	-24.846
Profit recognition income at fair value	-12.984.455	0	-12.984.455	0
Other non cash income/expenses	87.894	275.980	42	0
Finance Costs	7.488.170	4.807.957	6.501.033	3.552.026
Adjustments for changes in working capital				
Decrease/(increase) in inventories	-23.823.350	8.998.037	-14.908.651	7.104.446
Decrease/(increase) in receivables	-26.851.070	-1.119.652	-21.510.695	-2.652.021
(Decrease)/increase in payables(except bank loans and overdrafts)	17.908.136	-7.893.107	13.461.613	-5.652.146
Less:				
Financial Costs paid	-4.508.955	-4.765.401	-3.522.020	-3.509.918
Taxes paid	-79.288	-90.207	0	0
Total inflows / (outflows) from operating activities (a)	**-7.968.985**	**1.577.095**	**-3.879.433**	**959.317**
Investing activities				
Acquisition of subsidiaries	0	0	-7.765.900	0
Purchase of tangible and intangible assets	-1.389.572	-1.036.718	-1.229.270	-895.880
Proceeds on disposal of tangible and intangible assets	11.499.993	56.713	11.499.993	56.713
Interest received	198	2.358	4	2.136
Total inflows / (outflows) from investing activities (b)	**10.110.619**	**-977.647**	**2.504.827**	**-837.032**
Financing Activities				
New bank loans raised	106.752.089	4.212.381	79.579.345	4.401.739
Repayments of loans	-112.911.497	-493.591	-82.522.390	-318.224
Cash from share capital increase from contribution in kind	0	6.184.865	0	6.184.865
Total inflows / (outflows) from financing activities (c)	**-6.159.408**	**9.903.655**	**-2.943.045**	**10.268.381**
Net Increase/(Decrease) in cash and cash equivalents (a) + (b) + (c)	**-4.017.774**	**10.503.103**	**-4.317.650**	**10.390.666**
Cash and cash equivalents at the beginning of the period	16.742.221	6.239.118	15.748.471	5.357.806
Cash and cash equivalents at the end of the period	**12.724.447**	**16.742.221**	**11.430.821**	**15.748.471**

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 (Mavri Giora), ATHENS, 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 (VI PE 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, 2021, covering the period from January 1, 2021, to December 31, 2021. 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

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 01/01/2021.

- **Amendments to IFRS 4 "Insurance Contracts" – deferral of IFRS 9 (effective for annual periods starting on or after 01/01/2021)**

In June 2020, the IASB issued amendments that declare deferral of the date of initial application of IFRS 17 by two years, to annual periods beginning on or after January 1, 2023. Therefore, the IASB also extended the fixed expiry date for the temporary exemption from applying IFRS 9 "Financial Instruments" in IFRS 4 "Insurance Contracts", so that the entities are required to apply IFRS 9 for annual periods beginning on or after January 1, 2023. The amendments do not affect the consolidated Financial Statements.

- **Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16:" Interest Rate Benchmark Reform – Phase 2" (effective for annual periods starting on or after 01/01/2021)**

In August 2020, the IASB has finalized its response to the ongoing reform of IBOR and other interest benchmarks by issuing a package of amendments to IFRS Standards. The amendments complement those issued in 2019 and focus on the effects on financial statements when a company replaces the old interest rate benchmark with an alternative benchmark rate because of the reform. More specifically, the amendments relate to how a company will account for changes in the contractual cash flows of financial instruments, how it will account for a change in its hedging relationships because of the reform, as well as relevant information required to be disclosed. The amendments do not affect the consolidated Financial Statements.

- **Amendments to IFRS 16 "Leases": Covid-19 – Related Rent Concessions beyond 30 June 2021 (effective for annual periods starting on or after 01/04/2021)**

In March 2021, the IASB issued amendments to the practical expedient of IFRS 16, that extend the application period by one year to cover Covid-19-related rent concessions that reduce only lease payments due on or before 30 June 2022. The amendments do not affect the consolidated Financial Statements. 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 01/01/2020.

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.

- **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 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 01/01/2022.

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

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 "Classification of Liabilities as Current or Non-current" (effective for annual periods starting on or after 01/01/2023)**

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. 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 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 not been adopted by the European Union.

- **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 not been adopted by the European Union.

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3.3 Change in accounting policy regarding Attributing Benefits to Periods of Service in accordance with IAS 19 "Employee Benefits"

The International Financial Reporting Interpretations Committee issued the final agenda decision in May 2021, under the title "Attributing Benefits to Periods of Service" (IAS 19), which includes explanatory material regarding the way of distribution of benefits in periods of service following a specific defined benefit plan proportionate to that defined in Article 8 of Law 3198/1955 regarding provision of compensation due to retirement (the "Labor Law Defined Benefit Plan").

This decision differentiates the way in which the basic principles and regulations of IAS 19 have been applied in Greece in the previous years, and therefore, according to what is defined in the "IASB Due Process Handbook (par 8.6)", entities that prepare their financial statements in accordance with IFRS are required to amend their Accounting Policy accordingly.

Prior to the issuance of the agenda decision, the Group applied IAS 19 attributing the benefits defined under Article 8, Law 3198/1955, Law 2112/1920, and its amendment by Law 4093/2012 in the period from hiring until the employee retirement date.

The application of this final agendas decision in the accompanying consolidated financial statements has led to attributing benefits in the last 16 years until the date of employee retirement following the scale recorded in Law 4093/2012.

Based on the above, the aforementioned final decision of the Committee's agenda has been treated as a Change in Accounting Policy, applying the change retroactively from the beginning of the first comparative period, in accordance with paragraphs 19 - 22 of IAS 8.

The following tables present the effect of implementing the final agenda decision regarding every affected specific item of the financial statements. The table does not include the items non-affected by the change in accounting policy:

The Company (Amounts in thousand €)	**Revised Financial Statements**	**Published Financial Statements**	**Effect on Equity**
Statement of Comprehensive Income			
(Profit)/ loss before tax	(369)	(356)	(13)
Income Tax	(125)	(128)	3
Other Comprehensive (profit)/loss	20	(143)	163
Deferred tax attributed to other comprehensive income	(5)	34	(39)
Statement of Financial Position			
Provisions for employee benefits as at 01/01/2020	403	761	(358)
Provisions for employee benefits as at 31/12/2020	595	803	(208)
Deferred tax obligations as at 01/01/2020	3.111	3.025	86
Deferred tax obligations as at 31/12/2021	4.151	4.101	50

The Group (Amounts in thousand €)	**Revised Financial Statements**	**Published Financial Statements**	**Effect on Equity**
Statement of Comprehensive Income			
(Profit)/ loss before tax	792	805	(13)
Income Tax	(34)	(37)	3
Other Comprehensive (profit)/loss	19	(144)	163
Deferred tax attributed to other comprehensive income	(5)	35	(39)
Statement of Financial Position			
Provisions for employee benefits as at 01/01/2020	433	791	(358)
Provisions for employee benefits as at 31/12/2020	631	839	(208)
Deferred tax obligations as at 01/01/2020	3.065	2.979	86
Deferred tax obligations as at 31/12/2021	4.299	4.249	50

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 in order 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.

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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.

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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 a number of 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:
(a) the group or the company has a present obligation (legal or constructive) as a result of a past event;
(b) it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation; and
(c) 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 in particular, 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 so as 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:

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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.

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. In order 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 particular 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 2021, 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 01/01/2021 – 31/12/2021 is calculated at 25.32%.

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 - 31.12.2021				1.1-31.12.2020			
Amounts in Euros	Steel	Other	Intergroup	Total	Steel	Other	Intergroup	Total
Sales to other companies	226.066.434	343.127		226.409.561	132.888.493	366.183	0	133.254.677
Total Sales	**226.066.434**	**343.127**	**0**	**226.409.561**	**132.888.493**	**366.183**	**-**	**133.254.677**
Operational Profits	**25.372.249**	**172.156**	**0**	**25.544.405**	**3.893.858**	**223.681**	**0**	**4.117.539**
Finance cost	7.135.870	0	-	7.135.870	-4.929.942	0	-	-4.929.942
Result from investing activities	-962.372	0	-	-962.372	20.070	0	-	20.070
Profit before taxation	31.545.746	172.156	-	31.717.903	-1.016.014	223.681	-	-792.333
Profit after taxation	25.449.124	171.006	-	25.620.131	-976.786	218.863	-	-757.923
			-				-	
Depreciation	1.419.379	154.915	-	1.574.294	2.108.607	126.643	-	2.235.250
EBITDA	**26.791.628**	**327.072**	**0**	**27.118.699**	**6.002.465**	**350.324**	**0**	**6.352.789**
Assets to companies of group	**158.679.124**	**2.422.077**	**0**	**161.101.201**	**140.808.625**	**2.706.401**		**143.515.026**
Long-term & Short-term Liabilities	148.100.746	154.674	0	148.255.419	156.482.774	125.744	0	156.608.518

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

Amounts in Euro	1.1 - 31.12.2021			1.1-31.12.2020		
Company	Greece	Abroad	Total	Greece	Abroad	Total
SIDMA S.A.	135.378.798	14.666.426	**150.045.224**	83.253.995	10.624.819	**93.878.814**
SIDMA BULGARIA	0	43.732.511	**43.732.511**	0	25.939.776	**25.939.776**
SIDMA ROMANIA	0	32.631.827	**32.631.827**	0	13.436.087	**13.436.087**
Total	**135.378.798**	**91.030.764**	**226.409.561**	**83.253.995**	**50.000.682**	**133.254.677**

8 Financial Data Analysis

8.1 Property Plant and Equipment

Property, plant and equipment for the Group and the company as of December 31, 2021, are shown in the following tables:

Tangible Assets	Land	Buildings	Machinery	Transportation	Other equipment	Assets under construction	Grand Total
	Group						
Acquisition cost							
Acquisition cost or deemed cost 1.1.2020	**17.854.926**	**27.631.817**	**12.364.122**	**2.193.157**	**2.159.923**	**394.825**	**62.598.770**
Additions	0	3.427	84.389	394.396	27.466	488.698	**998.375**
Sales or Deletions	0	0	-422.939	-7.653	-245.134	0	**-675.726**
Revaluation of fair value	949.754	1.714.086	3.833.810	71.818	0	0	**6.569.467**
Depreciation due to revaluation of fair value	0	-3.656.933	-6.189.841	-130.180	0	0	**-9.976.954**
Transfers	0	744.253	97.925	0	8.252	-853.495	**-3.065**
Transfer of fixed assets to investment properties	-6.110.000	-6.420.000	0	0	0	**0**	**-12.530.000**
Exchange differences	-33.858	-42.744	-20.728	-593	-164	0	**-98.088**
Acquisition cost or deemed cost 31.12.2020	**12.660.822**	**19.973.906**	**9.746.738**	**2.520.945**	**1.950.342**	**30.028**	**46.882.781**
Depreciation							
Accumulated Depreciation 01.01.2020	**0**	**-2.863.385**	**-5.452.639**	**-1.850.071**	**-2.029.633**	**0**	**-12.195.727**
Depreciation of the year	0	-897.912	-1.071.140	-218.034	-51.644	0	**-2.238.729**
Depreciation due to revaluation of fair value	0	3.656.933	6.189.840	130.180	0	0	**9.976.953**
Depreciation of sold or deleted assets	0	0	333.939	0	245.131	0	**579.071**
Accumulated Depreciation 31.12.2020	**0**	**-104.364**	**0**	**-1.937.925**	**-1.836.145**	**0**	**-3.878.433**
Net Book value in 31.12.2020	**12.660.822**	**19.869.542**	**9.746.738**	**583.020**	**114.197**	**30.028**	**43.004.348**
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	0	0	-66.924	-6.872	-75.551	0	**-149.347**
Revaluation in fair values	0	0	0	0	0	0	**0**
Transfer of depreciation due to revaluation in fair values	0	0	0	0	0	0	**0**
Transfers	0	62.993	90.632	0	187	-160.192	**-6.380**
Transfer to Investment Property	0	0	0	0	0	0	**0**
Exchange differences	-31.993	-38.123	-14.087	-884	-84	0	**-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	**0**	**-104.364**	**0**	**-1.937.925**	**-1.836.145**	**0**	**-3.878.433**
Depreciation of the year	0	-796.944	-492.722	-239.553	-40.424	0	**-1.569.644**
Depreciation of sold or deleted assets	0	0	52.668	0	74.305	0	**126.973**
Accumulated Depreciation 31.12.2021	**0**	**-901.307**	**-440.054**	**-2.177.478**	**-1.802.265**	**0**	**-5.321.104**
Net Book value in 31.12.2021	**12.646.207**	**19.106.738**	**9.495.346**	**583.730**	**101.583**	**794.480**	**42.728.083**

Tangible Assets	Land	Buildings	Machinery	Transportation	Other equipment	Assets under construction	Grand Total
	Company						
Acquisition cost							
Acquisition cost or deemed cost 1.1.2020	**13.662.000**	**22.436.741**	**10.091.248**	**1.818.649**	**1.935.685**	**394.825**	**50.339.149**
Additions	0	3.427	52.152	290.003	23.257	488.698	**857.538**
Sales or Deletions	0	0	-403.473	-7.653	-244.736	0	**-655.861**
Revaluation of fair value	370.000	979.560	3.580.009	0	0	0	**4.929.569**
Depreciation due to revaluation of fair value	0	-2.705.562	-5.143.393	0	0	0	**-7.848.955**
Transfers	0	744.253	97.925	0	8.252	-853.495	**-3.065**
Transfer of fixed assets to investment properties	-6.110.000	-6.420.000	0	0	0	0	**-12.530.000**
Acquisition cost or deemed cost 31.12.2020	**7.922.000**	**15.038.420**	**8.274.469**	**2.100.999**	**1.722.459**	**30.028**	**35.088.374**
Depreciation							
Accumulated Depreciation 01.01.2020	**0**	**-2.025.583**	**-4.593.895**	**-1.565.205**	**-1.825.127**	**0**	**-10.009.810**
Depreciation of the year	0	-679.979	-863.970	-150.219	-44.670	0	**-1.738.838**
Transfer of depreciation held for sale	0	0	0	0	0	0	**0**
Depreciation due to revaluation of fair value	0	2.705.562	5.143.392	0	0	0	**7.848.954**
Depreciation of sold or deleted assets	0	0	314.473	0	244.733	0	**559.206**
Accumulated Depreciation 31.12.2020	0	0	0	-1.715.424	-1.625.064	0	**-3.340.487**
Net Book value in 31.12.2020	**7.922.000**	**15.038.420**	**8.274.469**	**385.575**	**97.395**	**30.028**	**31.747.887**
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	0	9.270	167.335	126.870	18.095	924.643	**1.246.213**
Sales or Deletions	0	0	-66.060	-6.872	-74.583	0	**-147.516**
Transfers	0	62.993	90.632	0	187	-160.192	**-6.380**
Acquisition cost or deemed cost 31.12.2021	**7.922.000,13**	**15.110.682,15**	**8.466.375,33**	**2.220.996,94**	**1.666.157,23**	**794.479,79**	**36.180.691,57**
Depreciation							
Accumulated Depreciation 01.01.2021	**0**	**0**	**0**	**-1.715.424**	**-1.625.064**	**-**	**-3.340.487**
Depreciation of the year	0	-592.106	-345.949	-168.568	-34.112	0	**-1.140.735**
Depreciation of sold or deleted assets	0	0	51.838	0	74.278	0	**126.116**
Accumulated Depreciation 31.12.2021	**0**	**-592.106**	**-294.110**	**-1.883.992**	**-1.584.898**	**-**	**-4.355.106**
Book value in 31.12.2021	**7.922.000**	**14.518.576**	**8.172.265**	**337.005**	**81.259**	**794.480**	**31.825.585**

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 1.1.2020	**419.115**	**1.597.497**	**2.016.612**	**1.440.375**
Additions	0	50.397	50.397	50.397
Transfers	0	3.064	3.064	3.064
Exchange differences	0	(67)	(67)	0
Acquisition cost or deemed cost 31.12.2020	**419.115**	**1.650.892**	**2.070.007**	**1.493.837**
Depreciation				
Accumulated Depreciation 01.01.2020	**0**	**(1.529.037)**	**(1.529.037)**	**(1.381.261)**
Depreciation of the year	0	(37.451)	(37.451)	(32.972)
Accumulated Depreciation 31.12.2020	**0**	**-1.566.488**	**-1.566.488**	**-1.414.233**
Net Book value in 31.12.2020	**419.115**	**84.403**	**503.518**	**79.603**
Acquisition cost				
Acquisition cost or deemed cost 1.1.2021	**419.115**	**1.650.892**	**2.070.007**	**1.493.837**
Additions	0	61.662	61.662	61.662
Exchange differences	0	(23)	(23)	0
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	**0**	**(1.566.488)**	**(1.566.488)**	**(1.414.233)**
Depreciation of the year	0	(42.057)	(42.057)	(38.101)
Depreciation of sold or deleted assets	0	0	0	0
Transfers	0	0	0	0
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**

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 31.12.2021, Group management performed an impairment test for the goodwill and no indicator for impairment arose. The recoverable amount 31.12.2021 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 7.1%, while the growth rate in perpetuity (after five years) used is 3.0% and EBITDA margin of 4.4% - 5.4%. 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) Market share during the budget period
d) 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.

Market share during the budget period – Management anticipates a slight upward trend in the market where the segment operates, during the budgeting period, in line with the GDP growth estimates of the Romanian economy according to IMF. The average rate of growth is 6.34% per annum. Also expecting its market share to increase from 1.1 % today to 1.3 % at the end of the budgeting period.

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

8.3 Investments in Subsidiaries

The Company participates 100% in the subsidiary SIDMA WORLDWIDE LIMITED. The value of the company SIDMA WORLDWIDE LIMITED on 31/12/2021 was as follows:

	Balance at the beginning of the year	Cumulative Impairment	Additions	Balance on 31.12.2021
SIDMA WORLWIDE LIMITED	17.002.387	-5.826.671	7.767.400	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	**11.175.716**	**11.175.716**
Profit/Loss from Impermeant test	7.767.400	0
Balance at the end of the year	**18.943.116**	**11.175.716**

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 31.12.2021, 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 6.6% for SIDMA BULGARIA S.A. and 7.1% for SIDMA ROMANIA SRL, while the growth rate on perpetuity (following the lapse of 5 years) was 2.0% 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.

8.4 Investment Property

Investment Property is analysed in the table below:

	Group	Company
Investment property	31.12.2021	31.12.2021
Opening Balance	**12.530.000**	**12.530.000**
Sales of investment property	(12.530.000)	(12.530.000)
Closing Balance	**0**	**0**

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. The property was burdened with mortgage for the same loan.

8.5 Other non-current assets

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

	Group		Company	
Amounts in Euros	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Non-current assets (guarantees)	73.953	79.655	69.108	75.531
Other	1.000	1.000	1.000	1.000
Total	**74.953**	**80.655**	**70.108**	**76.531**

8.6 Inventories

	Group		Company	
Amounts in Euros	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Merchandise	8.392.648	6.023.541	7.238.117	5.440.048
Finished and semi-finished products	5.755.807	3.961.802	4.317.250	3.309.021
Raw, auxiliary materials and spare parts	20.639.200	6.157.635	16.884.105	4.981.752
Payments in advances to suppliers	7.307.547	2.328.873	0	0
Total	**42.095.202**	**18.471.851**	**28.439.472**	**13.730.821**

Steel accounts for 88% of the parent Company's inventory and over 95% 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 62% compared to that of 2020 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.

8.7 Trade Receivables

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Customers	30.695.585	33.843.596	24.277.353	28.377.782
Notes receivable	1.164.622	327.425	0	0
Cheques receivable	24.629.528	15.453.772	24.473.955	15.390.072
Less: Allowances for doubtful trade receivables	-1.552.554	-1.313.410	-924.711	-674.711
Total	**54.937.180**	**48.311.383**	**47.826.597**	**43.093.143**

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Balance at the beginning of the year	1.313.410	2.145.772	674.710	1.461.066
Deletion of doubtful clients/debtors	0	-786.356	0	-786.356
IFRS 9 Adjustments	0	0	0	0
Provisions for doubtful receivables	250.000	29.998	250.000	0
Income from prior years' provisions	0	-63.335	0	0
FX differences	-10.856	-12.669	0	0
Balance at the end of the year	**1.552.554**	**1.313.410**	**924.710**	**674.710**

The increase in the turnover of both the Company and the Group contributed to the significant increase of its trade receivables.

The Company has established criteria for providing credit to customers which are generally based on the size of the customer's activities, the financial position as well as the assessment of relevant financial information. In addition, liquidity management is achieved by combining approved borrowing through factoring with and without recourse. In 2021, the Company signed a series of new financing agreements through factoring without recourse, the limit of which now amounts to approximately € 16 million, as it was taken into account by the creditor banks that following the completion of disbursement of the new bond loans as at 05 February and the profitable period results, the Company's and the Group's Equity has been consolidated while the same applies to the working capital of both the Group and the Company which is now positive.

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	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Non-due trade receivables	46.417.584	40.668.165	39.498.253	35.552.428
Overdue and non-impaired receivables				
<90 days	7.362.670	5.711.444	7.305.692	5.652.141
<91 - 180 days	812.137	1.127.435	776.284	1.127.435
<181 - 360 days	167.260	321.869	68.840	278.669
> 360 days	415.486	720.427	415.486	720.427
Estimated credit losses	-237.957	-237.957	-237.957	-237.957
Total	**54.937.180**	**48.311.383**	**47.826.598**	**43.093.143**

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

8.8 Other Receivables

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Sundry debtors	1.519.168	1.369.749	1.028.047	1.051.093
Receivables from the State (taxes, etc)	44.193	35.167	10.804	10.804
Purchases in transit	6.334.153	2.147.208	6.334.153	2.147.208
Blocked deposits	31.684	31.684	0	0
Short-term receivables against associated companies	0	0	0	0
Prepaid expenses	89.037	190.278	66.380	167.923
Accrued Income	0	97.255	0	97.255
Total	**8.018.234**	**3.871.341**	**7.439.384**	**3.474.284**

The increase in Purchases in transit, reflects on one hand the growing demand and on the other the increase in the average price of raw materials because of the increase in the price of steel worldwide.

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	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Cash on hand	37.806	12.017	2.454	2.732
Short-term deposits	12.686.642	16.730.204	11.428.367	15.745.739
Total	**12.724.447**	**16.742.221**	**11.430.821**	**15.748.471**

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.

Restricted deposits arise from liquidated securities/short-term hedging financing recycled in a short period of 3 months amounting to € 2 million as at 31.12.2021.

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 1.1.2020	**2.518.248**	**239.720**	**866.370**	**9.064.267**	**9.094.714**	**(54.699)**	**21.728.620**
Changes during the current year	-	-	-	-	5.591.530	155.132	5.746.661,91
Balance in 31.12.2020	**2.518.248**	**239.720**	**866.370**	**9.064.267**	**14.686.244**	**100.434**	**27.475.282**
Changes during the current year	0	0	0	0	262.416	82.426	**344.842**
Balance in 31.12.2021	**2.518.248**	**239.720**	**866.370**	**9.064.267**	**14.948.660**	**182.859**	**27.820.123**

	Company					
	Legal Reserve	Extraordinary Reserves	Special Reserves	Tax-free reserves under special laws	Difference from the revaluation of assets	Total
Balance in 1.1.2020	**2.518.248**	**239.720**	**866.379**	**9.064.267**	**6.227.065**	**18.915.678**
Changes during the current year	-	-	-	-	4.144.544	**4.144.544**
Balance in 31.12.2020	**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**

8.12 Loans

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Long-term loan liabilities				
Bond loans	68.997.368	52.967.719	67.870.920	52.967.719
Long-term bank loans	12.667.230	9.006.234	649.998	1.249.998
Leasing liabilities (long-term)	280.185	310.576	165.144	213.193
Less: Current installments of long-term loans	-4.949.281	-53.877.343	-3.822.833	-53.167.720
Less: Difference in the initial recognition of the fair value of new loans due to restructuring	-12.983.085	0	-12.983.085	0
Total long-term liabilities (a)	**64.012.417**	**8.407.186 0**	**51.880.144**	**1.263.191**
Short-term loan liabilities				
Short-term bank loans	793.793	36.004.643	0	23.793.239
Leasing liabilities (short-term)	236.294	245.737	139.579	134.290
Financing through factoring	12.378.199	16.616.636	12.378.199	16.031.828
Total short-term liabilities (b)	**13.408.286**	**52.867.016**	**12.517.778**	**39.959.358**
Plus: Current installments of long-term loans (c)	4.949.281	53.877.343	3.822.833	53.167.720
Grand Total (a)+(b)+(c)	**82.369.984**	**115.151.545**	**68.220.755**	**94.390.268**

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.

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 31.12.2021 and 31.12.2020.

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Up to 1 year	19.943.453	106.744.359	16.340.611	93.127.077
Between 1 and 5 years	24.696.357	8.407.186	15.765.513	1.263.191
More than 5 years	37.730.174	0	36.114.631	0
Total	**82.369.984**	**115.151.545**	**68.220.756**	**94.390.268**

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 31/12/2021 the Group had no foreign currency loans.

The average borrowing cost for the Company and the Group amounted to 3.4% and 3.8% respectively based on the contractual interest rate and at a rate of 7.0% and 6.7% respectively based on the effective borrowing rate.

The Group has a regular policy not to use all its available credit lines in order 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:

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	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Grants	26.242	68.166	26.242	68.166
Total	**26.242**	**68.166**	**26.242**	**68.166**

Depreciated Government Grants amounted to € 41,924 in 2021 and € 40,930 in 2020.

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 31.12.2021 is 22%.

	Group						
	Fixed Assets	Investments	Retirement Benefits to personnel	Provision for doubtful debtors	Loans	other provisions	Total
01.01.2020	**- 4.739.387**	**95.303**	**286.766**	**1.291.197**	**-**	**672**	**- 3.065.449**
(Credit)/Debit of profit - loss statement	83.020	39.922	- 131.614	133.290	-	-	**124.617**
(Credit)/Debit of Comprehensive Income	- 1.363.233	4.812	-	-	-	-	**- 1.358.421**
31.12.2020	**- 6.019.601**	**140.037**	**155.151**	**1.424.488**	**-**	**672**	**- 4.299.253**
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 Statement	262.458	-	-	-	-	-	**262.458**
31.12.2021	**- 4.955.112**	**136.429**	**174.489**	**490.131**	**- 2.793.557**	**44.672**	**- 6.902.949**

	Company						
	Fixed Assets	Investments	Retirement Benefits to personnel	Provision for doubtful debtors	Loans	other provisions	Total
01.01.2020	**- 4.416.375**	**93.551**	**293.545**	**915.586**	**-**	**-**	**- 3.113.693**
Adjustments due to absorption of subsidiary company	83.459	41.325	- 131.614	131.614	-	-	**124.784**
Effect from the change of tax rate in the P&L	- 1.170.322	7.963	-	-	-	-	**- 1.162.359**
31.12.2020	**- 5.503.237**	**142.839**	**161.930**	**1.047.200**	**-**	**-**	**- 4.151.268**
01.01.2021	**- 5.503.237**	**142.839**	**161.930**	**1.047.200**	**-**	**-**	**- 4.151.268**
(Credit)/Debit of profit - loss statement	508.481	1.160	32.832	- 657.952	- 2.793.557	44.000	**- 2.865.035**
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 Statement	262.458	-	-	-	-	-	262.458
31.12.2021	**-4.536.153**	**139.230**	**181.268**	**301.982**	**-2.793.557**	**44.000**	**-6.663.230**

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	31.12.2021	31.12.2020	31.12.2021	31.12.2020
DBO at start of period	**631.129**	**428.416**	**595.162**	**402.632**
Service Cost	28.198	58.828	59.055	47.975
Interest Cost	5.390	6.487	5.359	6.039
Settlement/Termination loss/(gain)	99.098	30.639	99.098	30.639
Past service cost arising over the period	10.720	21.252	10.720	21.252
Benefits paid directly by the companies	-168.957	-37.541	-168.957	-37.541
Actuarial (gain)/loss- financial assumptions	5.057	15.836	4.562	16.955
Actuarial (gain)/loss - other assumptions	27.868	3.388	27.868	3.388
Transfer of Personnel from BITROS STEEL	0	103.822	0	103.822
DBO at end of period	**638.503**	**631.129**	**632.866**	**595.162**

The amounts recognized in the Income Statement are:

	Group		Company	
Amounts recognized in P & L Statement	31.12.2020	31.12.2019	31.12.2020	31.12.2019
Service Cost	28.198	58.828	59.055	47.975
Interest Cost	5.390	6.487	5.359	6.039
Settlement/Termination loss/(gain)	99.098	30.639	99.098	30.639
Past service cost arising over the period	10.720	21.252	10.720	21.252
Total P & L Charge	**143.407**	**117.207**	**174.232**	**105.906**

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

	Group		Company	
Amounts recognized in OCI	31.12.2021	31.12.2020	31.12.2021	31.12.2020
DBO adjustment through OCI	0	0	0	0
Actuarial (gain)/loss- financial assumptions	-5.057	-15.836	-4.562	-16.955
Actuarial (gain)/loss - other assumptions	-27.868	-3.388	-27.868	-3.388
Total amount recognized in OCI	**-32.924**	**-19.224**	**-32.429**	**-20.343**

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

	Group		Company	
Assumptions	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Discount Rate	0,75%	0,90%	0,75%	0,90%
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:

31.12.2021	Group		Company	
Discount Rate	+ 1%	- 1%	+ 1%	- 1%
Benefit Obligation	635.614	641.415	630.004	635.753

31.12.2021	Group		Company	
Future price inflation	+ 1%	- 1%	+ 1%	- 1%
Benefit Obligation	641.484	635.539	635.822	629.929

8.16 Trade payables

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Trade Suppliers	49.642.947	31.875.442	38.136.132	24.454.017
Total	**49.642.947**	**31.875.442**	**38.136.132**	**24.454.017**

The significant increase in the Company's and the Group's trade payables arises from both the increase in purchases (mainly due to the increase in the average price of raw materials) and the provision of higher credit by key suppliers to the Company and the Group because of the improvement in equity and working capital respectively.

Specifically, the weighted average repayment days of the suppliers amounted to 69 days from 43 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	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Advances from trade debtors	881.515	512.520	876.335	506.309
Social Security	247.324	260.902	247.324	260.902
Sundry debtors	2.246.703	2.023.190	2.244.301	1.909.758
Accrued Expenses	1.353.923	352.671	1.316.774	352.671
Other short-term liabilities	551.802	1.328.225	158.625	1.191.544
Other (accruals or deffered income)	248.361	105.475	68.091	105.475
Total	**5.529.628**	**4.582.984**	**4.911.450**	**4.326.660**

8.18 Turnover (Sales)

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

	1.1 - 31.12.2021		1.1-31.12.2020	
	Group	Company	Group	Company
Manufacture of basic iron, steel and ferro-alloys	109.074.372	71.443.154	58.214.618	39.567.884
Wholesale of metals and metal ores	82.820.274	44.109.982	48.585.342	27.862.190
Manufacture of metal structures and parts of structures	18.379.853	18.379.853	14.404.124	14.404.124
Treatment and coating of metals	11.567.350	11.567.350	7.585.076	7.585.076
Produstion of Electricity	343.127	343.127	366.183	366.183
Manufacture of steel tubes	4.224.585	4.224.585	4.099.333	4.099.333
Σύνολο	**226.409.561**	**150.068.051**	**133.254.677**	**93.884.791**

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 € 47,448,764. The respective amount of the previous year 2020 was € 29,495,904. The above amounts should be considered for the calculation of any ratios based on the turnover of the Group and the Company.

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8.19 Cost of Sales

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Cost of Goods	186.566.258	114.383.516	119.385.184	77.779.216
Devaluation of stock	200.000	0	200.000	0
Payroll & Related Expenses	1.510.009	1.352.409	1.308.690	1.175.960
Third Party Fees & Related Expenses	1.700.803	1.955.575	1.628.360	1.899.362
Utilities - Services	755.352	546.484	678.865	499.671
Taxes - Stamp Duties	19.371	28.088	6.339	16.919
Various Expenses	301.762	225.768	202.230	156.109
Depreciation	692.326	1.143.952	544.479	994.082
Total	**191.745.882**	**119.635.792**	**123.954.147**	**82.521.318**

The increase in inventory acquisition costs of both - the Company and the Group - was primarily due to the increase in the average market price caused by the increase in metal prices worldwide. Quantities increased by approximately 10%.

8.20 Other Income

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Income from rendering services to third parties	769.584	741.690	769.584	741.690
Agency Fees	2.823.580	1.817.362	2.207.362	1.391.076
Rentals	283.751	295.887	283.751	295.887
Invoiced expenses for dispatching goods	1.820.384	1.464.618	1.202.606	1.140.179
Incidental activity income	214.378	62.146	0	0
Prior year's income	27.331	142.490	22.794	57.348
Income from the depreciation of granted assets	41.924	40.930	41.924	40.930
Other non-operating income	359.829	509.890	359.829	401.538
Income from prior years' provisions	0	46.999	0	0
Total	**6.340.761**	**5.122.012**	**4.887.851**	**4.068.649**

8.21 Administrative expenses

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Payroll & Related Expenses	1.924.089	1.892.817	1.282.015	1.374.666
Third Party Fees & Related Expenses	924.507	1.220.869	700.619	1.026.796
Utilities - Services	222.990	185.801	123.274	110.099
Taxes - Stamp Duties	347.203	349.466	313.361	313.545
Various Expenses	282.987	255.876	99.375	129.398
Depreciation	312.520	371.977	269.498	339.525
Provisions	163.795	41.039	168.872	41.039
Total	**4.178.091**	**4.317.845**	**2.957.014**	**3.335.066**

8.22 Selling/Distribution expenses

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Payroll & Related Expenses	4.141.813	3.628.175	2.965.862	2.553.962
Third Party Fees & Related Expenses	1.220.520	1.020.688	614.367	597.342
Utilities - Services	1.069.727	1.032.878	1.034.627	942.030
Taxes - Stamp Duties	96.438	120.521	89.203	62.803
Various Expenses	3.821.847	3.549.051	3.639.965	3.466.400
Depreciation	611.040	746.462	369.045	438.188
Provisions	0	30.545	0	0
Total	**10.961.386**	**10.128.320**	**8.713.069**	**8.060.724**

8.23 Other expenses

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Prior years expenses	52.823	135.684	52.823	135.684
Other non-operating expenses	17.737	41.508	5.771	2.631
Provisions for doubtful receivables	250.000	0	250.000	0
Total	**320.560**	**177.193**	**308.594**	**138.316**

8.24 Finance expenses (net)

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Credit interest	5.910	2.731	192	2.512
Other related income	14.801.482	0	14.801.482	0
Financial Income	**14.807.392**	**2.731**	**14.801.674**	**2.512**
Interest Expense	-4.166.002	-4.089.880	-3.193.924	-2.891.410
Other bank expenses	-898.305	-679.713	-847.245	-638.943
Revenue / Expenses from repayment of bond loans at fair value (IFRS 9)	-2.433.270	0	-2.433.270	0
Interest (IAS 19)	-5.359	-11.412	-5.359	-11.412
Financial Leasing (IFRS 16)	-45.130	-25.661	-21.235	-10.261
FX Differences	-123.457	-126.007	0	0
Financial Expenses	**-7.671.522**	**-4.932.673**	**-6.501.033**	**-3.552.026**
Total	**7.135.870**	**-4.929.943**	**8.300.641**	**-3.549.514**

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%, 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, while the issuance expenses are included in the financial expenses.

8.25 Investing Activities

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

	Group		Company	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Extraordinary Profits\Losses	-962.372	-33.161	-962.372	-33.161
Total	**-962.372**	**-33.161**	**-962.372**	**-33.161**

From the impairment test carried out on 31.12.2021 (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	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Income Tax	-3.145.167	-8.928	-3.022.567	0
Deferred Tax	-2.870.902	124.617	-2.781.513	124.784
Tax audit differences	-81.703	-81.279	0	0
Total	**-6.097.772**	**34.410**	**-5.804.079**	**124.784**

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	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Income tax of the year	-3.145.167	-8.928	-3.022.567	-
Deffered tax	-2.870.902	124.617	-2.781.513	124.784
Other taxes	-81.703	-81.279	-	-
Total	**-6.097.772**	**34.410**	**-5.804.079**	**124.784**
Profit before taxation	31.717.903	-792.333	26.361.346	368.571
Tax rate	22%	24%	22%	24%
Expected Tax Cost	**-6.977.939**	**190.160**	**-5.799.496**	**-88.457**
Additional taxes & surcharges for previous years	-81.703	-	-	-
Tax effect of non-taxed income	692.828	-	692.828	-
Impact from fiscal losses for which no deferred tax was recognized / Use of transfer. tax losses	679.720	220.808	-	423.057
Derecognition of deferred taxes	-847.090	134.652	-657.952	134.653
Effect from non-deductable expenses	-64.088	-344.469	-122.940	-344.469
Effect from the change of the tax rates	83.481	-	83.481	-
Taxes of previous years	-81.703	-81.279	-	-
Effects from differences in the tax rates of foreign subs	498.723	-85.462	-	-
Total	**-6.097.772**	**34.410**	**-5.804.079**	**124.785**

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	
	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Profit to the Shareholders of the mother company	25.620.131	-757.923	20.557.266	493.356
Weighted number of shares	13.582.223	13.582.223	13.582.223	13.582.223
Basic Earnings Per Share (EURO/share)	1,8863	-0,0558	1,5135	0,0363

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 2019 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 2020, 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 2020. 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.

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 2020 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 € 1.3 million for the Group and the Company.

Guarantees for liabilities.

- Issuance of letter of guarantees as assurance for payables, amounting to € 16 thousand for the Group and the Company.
- Guarantees (cheques receivable and ceded receivables-invoice factoring) amounting to € 2.1 million, for the assurance of bank financing of the subsidiaries in Romania and Bulgaria.
- Issuance of guarantees amounting to € 10.5 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 (excluding the property of Inofyta), 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 € 0.7 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 € 5 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 € 0.5 million, which have been registered on the mechanical equipment of the subsidiary SIDMA Romania SRL, for loans with a nominal value of € 16.2 million.

8.30.3 Legal Affairs

There are no legal or arbitration decisions by judicial or arbitration bodies that may have an impact on the financial position or operating results of the Group companies.

8.31 Risk management

The Company and the Group face certain risks and uncertainties that may adversely affect their operation, financial performance, and future prospects. Therefore, they developed a risk management and evaluation strategy program. The corporate governance system adopted by the Company includes adequate and effective risk management activities, continuously applied by the parent company and its subsidiaries, in all their directorates, departments and facilities, through the existing procedures and policies.

Taking into account the effects of COVID-19, fluctuation of steel prices in the stock markets and provisions of Law 4706/2020 on Corporate Governance of public limited companies, the Company's risk management program was further improved through establishing separate Risk Management Regulatory Compliance units, governed by their own Operating Regulations and their own Policies. In addition, the Chief Risk Officer, and the Chief Compliance Officer, appointed by the Company's CEO based on the Company's Recruitment Policies and Procedures, have the appropriate knowledge and relevant professional experience, as well as free access to any organizational unit of the Company, and are aware of any information required to perform their duties.
At the operational level, a recording, analytical description and evaluation of the most significant risks that the Company may have to address was carried out, while at the same time the degree of compliance of the Company with the current legislative and regulatory framework was reviewed. The main risks and uncertainties that the Company and the Group may be exposed to in 2022 are summarized in the table below, while the corrective measures - either already implemented or to be implemented - are also recorded.

Risks categories	Description of significant risks	Potential impact	Main ways to address them	Risks related to key issues
Reputation and Clientele Risk	Inability to innovate and meet customer needs	Decrease in sales, loss of market share and financial loss	• Implementation of quality policy, sustainable development policy • Improving the capabilities of our key customers aiming at cooperation and development with top customers • Development of our partners in distribution networks	Financial effects
Reputation and Clientele Risk	Environmental pollution	Financial sanctions, damage to our license, and increased business costs	• Strict compliance controls in accordance with the effective Environmental Legislation	Packaging, recycling and waste management
Reputation and Clientele Risk	Corruption and bribery	Financial sanctions, damage to our corporate reputation, dedication of management time to resolving legal issues and financial loss	• Establishment of whistleblowing plan for incidents that do not comply with the code of ethics and business ethics of our company • Establishment of evaluation questionnaires of our suppliers and partners	Corporate governance, business ethics and fight against corruption
Operational Risk	Inability to attract, retain and employ a sufficient number of trained and experienced staff	Inability to implement the company's development plans	• Development of executives and improvement of employees' skills • Promoting an inclusive work environment and creating shared value among employees	Employee well-being, development, and participation
Operational Risk	Serious labour accidents	Death or injury of an employee	• Establish strict controls for hygiene and safety at the company's facilities • Ongoing education and training of employees	Human resources, Health and Safety, employee well-being
Operational Risk	Leakage, loss, theft of personal passwords in the company's computer system	Violation of corporate and personal privacy, information leakage and loss of the company's competitive advantage	• Implementation of proper use and security checks of PC • Apply political passwords • Staff education and training	Information systems security
Financial Risk	Risks to the macroeconomic environment (including the	Decrease in sales, trading activity, impact on liquidity and	• Strict customer credit control • Satisfactory dispersion of clientele	Economic consequences

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Risks categories	Description of significant risks	Potential impact	Main ways to address them	Risks related to key issues
	effects of COVID-19)	financial loss	• Maintaining sufficient liquidity of the company	
Financial Risk	Credit risk, interest rate risk, liquidity risk, raw material price fluctuation risk, foreign exchange risk	Effect on liquidity and financial loss	• Strict customer credit control • Satisfactory dispersion of clientele • Maintaining sufficient liquidity of the company • Our company is constantly considering actions, such as restructuring of structures, reduction of support costs and use of its assets to improve its financial position.	Economic consequences

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 COVID-19 pandemic, despite the positive prospects that seem to be fading, continues to have an adverse impact on economic conditions around the globe. The parent company and its subsidiaries responded immediately, prioritizing the health and safety of human resources, their suppliers and partners, taking measures to ensure the going concern with the least possible effects.
Regarding the effects of recent developments in Ukraine and Russia on the Group's and the Company's operations, we would like to report that in 2021:

- The turnover percentage related to sales of imported products from the above countries was approximately 6.5% of the total.
- The product acquisition percentage from the above countries concerned approximately 6.8% of the Company's total imports.
- The Company's assets do not have any exposure regarding the above countries.

The Company and the Group have a broad dispersion of suppliers from various countries, thus ensuring smooth operation of the supply chain. Many steel producers, however, depend to a considerable degree on raw material supplies from some regions of Ukraine and Russia. Currently, it is impossible to measure the impact of the recent developments in Ukraine and Russia on the operations of our suppliers and - consequently - on the respective operations of the Company and the Group. However, increases in energy and inflation could have indirect effects by increasing their operating costs as steel mills are energy consuming. Eurofer, the European association of steelmakers, is sounding the alarm, stressing that key industries, such as steelmakers, will not be able to sustain the energy costs they are experiencing today.

Regarding the effects of the energy crisis on the indirect costs of the company and the Group, given that they are steel service centres and not steel manufacturers, even at current energy prices, energy costs as a percentage of total expenses would rise, for 2021, from 3.1% to 5.4%.

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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 2021, no customer participated in the turnover by more than 2.0%, while there was dispersion to many customers. Retail sales are made in cash. On 31.12.2021, 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	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Cash and cash equivalents	12.724.447	16.742.221	11.430.821	15.748.471
Trade and other receivables	66.295.886	52.263.379	55.336.089	46.643.957
Total	**79.020.333**	**69.005.600**	**66.766.911**	**62.392.428**

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 2021	(1.109.994)	1.109.994	(1.109.994)	1.109.994	(937.545)	937.545	(937.545)	937.545
31st December 2020	(1.145.939)	1.145.939	(1.145.939)	1.145.939	(940.414)	940.414	(940.414)	940.414

8.31.4 Liquidity Risk

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

As at 31.12.2021 the Group maintained cash available of € 12.7 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. In 2021, the Company signed a series of new financing agreements through factoring without recourse (zero risk), the limit of which now amounts to approximately € 16 million, as it was considered by the creditor banks that following the completion of the disbursement of the bond loans in February 2021 the Company and the Group Equity have been consolidated and the provisions of par. 4 of Article 119 of Law 4548/2018 no longer exist. The same applies to the working capital of both the Group and the Company which is now positive and on 31/12/2021 amounts to € 51 million and € 38 million respectively.

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

	Group							
	31.12.2021				31.12.2020			
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	16.006.775	3.936.678	24.696.357	37.730.174	52.867.017	53.877.343	8.407.186	-
Trade Payables	49.642.947	-	-	-	31.875.442	-	-	-
Other Payables	5.529.628	-	-	-	4.582.984	-	-	-
Total	**71.179.350**	**3.936.678**	**24.696.357**	**37.730.174**	**89.325.443**	**53.877.343**	**8.407.186**	**0**

	Company							
	31.12.2021				31.12.2020			
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	14.420.889	1.919.722	15.765.513	36.114.631	39.959.358	53.167.720	1.263.191	-
Trade Payables	38.136.132	-	-	-	24.454.017	-	-	-
Other Payables	4.911.450	-	-	-	4.326.660	-	-	-
Total	**57.468.470**	**1.919.722**	**15.765.513**	**36.114.631**	**68.740.034**	**53.167.720**	**1.263.191**	**0**

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 2017 to December 2021, 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	558	701	675
Standard Deviation	144	180	153

Correspondingly, the gross profit margin had fluctuations of the order of 800 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 2021 and 2020 earnings would be approximately:

GROUP	2019		2020	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	1.132	-1.132	666	-666
Equity	1.132	-1.132	666	-666

COMPANY	2019		2020	
THOUSANDS €	50 b.p.	-50 b.p.	+50 b.p.	-50 b.p.
Net Earnings	750	-750	469	-469
Equity	750	-750	469	-469

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.

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			
	31.12.2021		31.12.2020	
amounts in €	**USD**	**RON**	**USD**	**RON**
Financial Current Assets	836.646	10.743.824	1.442	3.562.346
Financial Liabilities	-	-	-	- 15.982.575
Short-term elements	**836.646**	**10.743.824**	**1.442**	**-12.420.230**
Financial Current Assets	-	-	-	-
Financial Liabilities	-	-	-	- 1.086.580
Long-term elements	-	-	-	- 1.086.580

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:

	31.12.2021			
	+ 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

	31.12.2020			
	+ 10%	- 10%	+ 10%	- 10%
amounts in €	USD		RON	
Profits (losses) before taxes	-131	160	116.352	-142.207
Equity	-131	160	727.318	-888.945

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 fiscal year.

On December 31, 2021, the Company's and the Group's Equity are negative. However, Management is considering immediate measures to address the Company's and the Group's negative equity.

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:

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

8.33.2 Non financials assets

Regarding the non-financial assets (land, buildings, and machinery), their fair values (level 3) on 31.12.2021 and 31.12.2020 were for the Group and the company as follows:

	Group		Company	
Level 3	31.12.2021	31.12.2020	31.12.2021	31.12.2020
Own Land, Buildings, Machinery	41.248.291	42.277.103	30.612.841	31.234.890
Investment Property	0	12.530.000	0	12.530.000
	41.248.291	**54.807.103**	**30.612.841**	**43.764.890**

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 fair value of the Company's and the Group's properties was calculated by an independent appraisal firm, which determined the fair value of the properties following the internationally recognized valuation methods.

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	1.1-31.12.2021	1.1-31.12.2020	1.1-31.12.2021	1.1-31.12.2020
Average no. of personnel	241	230	163	154

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.

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Sales of goods				
Subsidiares	0	22.827	0	5.978
Other companies of the group	7.645.122	4.865.812	3.852.074	3.188.612
Total	**7.645.122**	**4.888.639**	**3.852.074**	**3.194.589**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Sales from services rendering				
Subsidiares	0	0	0	12.516
Other companies of the group	5.603.852	4.597.855	2.971.678	2.388.905
Total	**5.603.852**	**4.597.855**	**2.971.678**	**2.401.421**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Sales of fixed assets				
Subsidiares	0	0	0	0
Other companies of the group	11.500.000	11.500.000	11.713	11.713
Total	**11.500.000**	**11.500.000**	**11.713**	**11.713**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Receivalbes				
Subsidiares	0	2	0	2
Other companies of the group	3.405.001	2.969.168	2.346.503	2.198.330
Total	**3.405.001**	**2.969.170**	**2.346.503**	**2.198.331**

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	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Purchases of goods				
Subsidiares	0	24.297	0	34.968
Other companies of the group	38.966.780	11.488.941	20.876.682	5.939.347
Total	**38.966.780**	**11.513.238**	**20.876.682**	**5.974.315**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Receiving of services				
Subsidiares	0	0	0	155
Other companies of the group	1.155.699	1.120.945	915.236	888.625
Total	**1.155.699**	**1.120.945**	**915.236**	**888.780**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Purchases of fixed assets				
Subsidiares	0	0	0	0
Other companies of the group	99.491	99.491	41.595	41.595
Total	**99.491**	**99.491**	**41.595**	**41.595**

	1.1-31.12.2021		1.1-31.12.2020	
Amounts in euros	**Group**	**Company**	**Group**	**Company**
Payables				
Subsidiares	0	141	0	141
Other companies of the group	33.356.026	21.761.194	23.869.569	16.671.049
Total	**33.356.026**	**21.761.335**	**23.869.569**	**16.671.190**

8.36 Management and Board of Directors' fees

	Group		Company	
	1.1-31.12.2021	1.1-31.12.2020	1.1-31.12.2021	1.1-31.12.2020
Management Fees (short-term)	807.617	561.961	547.865	406.259
Board of Directors fees (short-term)	63.617	151.081	45.800	134.400
Total	**871.234**	**713.042**	**593.665**	**540.659**

8.37 Post Balance Sheet Events

There are no other events after 31.12.2021 that significantly affect the financial situation and the results of the Group and the Company except the following:

➢ **Conflict between Ukraine and Russia**

Regarding the effects of recent developments in Ukraine and Russia on the Group's and the Company's operations, we would like to report that in 2021:

- The turnover percentage related to sales of imported products from the above countries was approximately 6.5% of the total.
- The product acquisition percentage from the above countries concerned approximately 6.8% of the Company's total imports.
- The Company's assets do not have any exposure regarding the above countries.

The Company and the Group have a broad dispersion of suppliers from various countries, thus ensuring smooth operation of the supply chain. Many steel producers, however, depend to a considerable degree on raw material supplies from some regions of Ukraine and Russia. Currently, it is impossible to measure the impact of the recent developments in Ukraine and Russia on the operations of our suppliers and -

consequently - on the respective operations of the Company and the Group. However, increases in energy and inflation could have indirect effects, increasing their operating costs.

8.38 Approval of Financial Statements

The Annual Financial Report for the year 2021 (1.1.2021 to 31.12.2021) was approved by the Company's Board of Directors on April 08, 2022 and has been posted on the Company's website www.sidma.gr.

Aspropyrgos, Attiki, – April 08, 2022

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