



Sustainability Statement

2024 Summary

1. Introduction

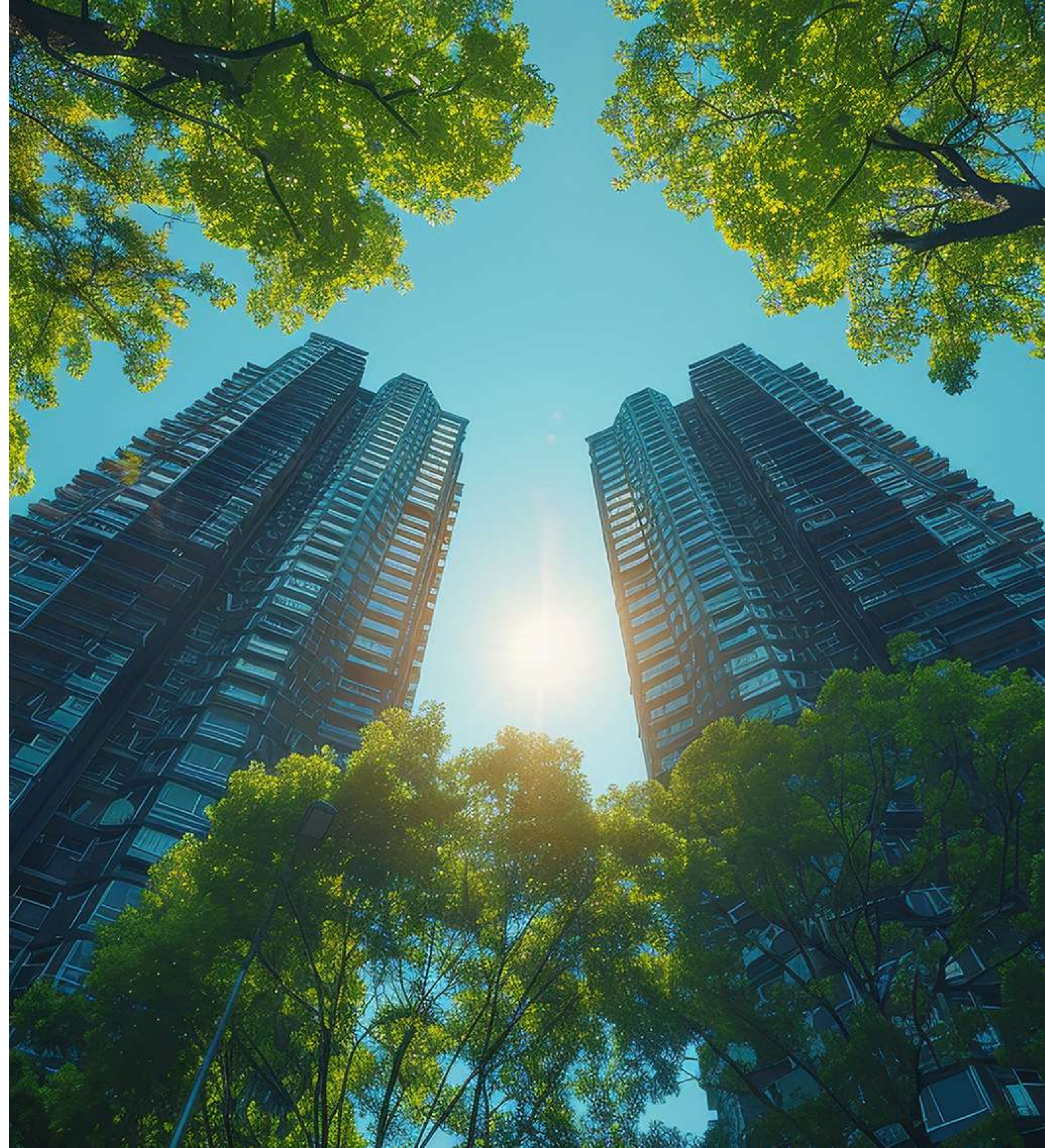
ALUMIL Group, one of the leading global players in the design and production of architectural aluminium systems, continues its dynamic growth, maintaining a leading position in the Greek market and a strong presence in over 60 countries worldwide.

The year 2024 marked a pivotal milestone in the Group's sustainable transition, as it signaled the adoption of the European Sustainability Reporting Standards (ESRS) and the publication of its first Sustainability Statement in line with the Corporate Sustainability Reporting Directive (CSRD).

The Sustainability Report is included in the Group's Annual Financial Report for the fiscal year 2024. It is based on a double materiality assessment, and reflects the Group's core priorities, actions, and performance in the areas of Environmental, Social and Governance (ESG).

This summary incorporates indicators and information aligned with the Athens Stock Exchange ESG Reporting Guide, aiming to inform all stakeholders meaningfully, while strengthening transparency and effective monitoring of sustainability targets.

The scope of the report covers the parent company as well as all subsidiaries with production units, in addition to any other subsidiaries that have a significant societal impact or substantial economic activity.





2. ALUMIL Group at a Glance

ENVIRONMENT	SOCIETY	GOVERNANCE
		
16.5% Contribution of RES to the Group's energy consumption	564 female employees	12.9 % Increase in Group turnover
10% Reduction of Scope 1 and 2 emissions compared to 2023 (parent company ALUMIL S.A.)	0 Fatal accidents	40% Women on the Board of Directors
15.3% Reduction of Scope 1 and 2 emission intensity of the parent company (tn CO ₂ eq / € million)	14 Average training hours per employee	58.1 % Increase in Group EBITDA
44% Water reuse within the Group	11 Big CSR actions	60 Countries of operation

2.1 Awards / Distinctions

Awards



For the 4th consecutive year, ALUMIL has been listed among “The Most Sustainable Companies in Greece 2024”, the highest sustainability distinction in the country. The Group is recognized as one of the 50 leading Greek companies setting standards for Sustainable Development in Greece.



TÜV Austria Certification: 74% recycled content
We exceeded our initial goal of using at least 60% recycled content in all architectural aluminium profiles for the year 2024.



ALUMIL received 1st prize in the category "Best Company in the ATHEX ESG Index – 2024" at the "HRIMA Business Awards 2024".

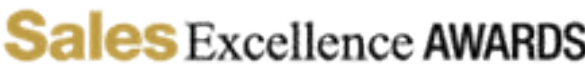
Distinctions



Official launch of Loop 80, the first certified recycled aluminium in Greece for architectural systems, consisting of 80% recycled material.



With a score of 100 out of 100, ALUMIL earned the highest rating in the ESG evaluation conducted by the global platform Synesgy, achieving Score A – Excellent for 2024.



Sales Excellence Awards 2024: Honorary distinction awarded to the President & CEO of ALUMIL.



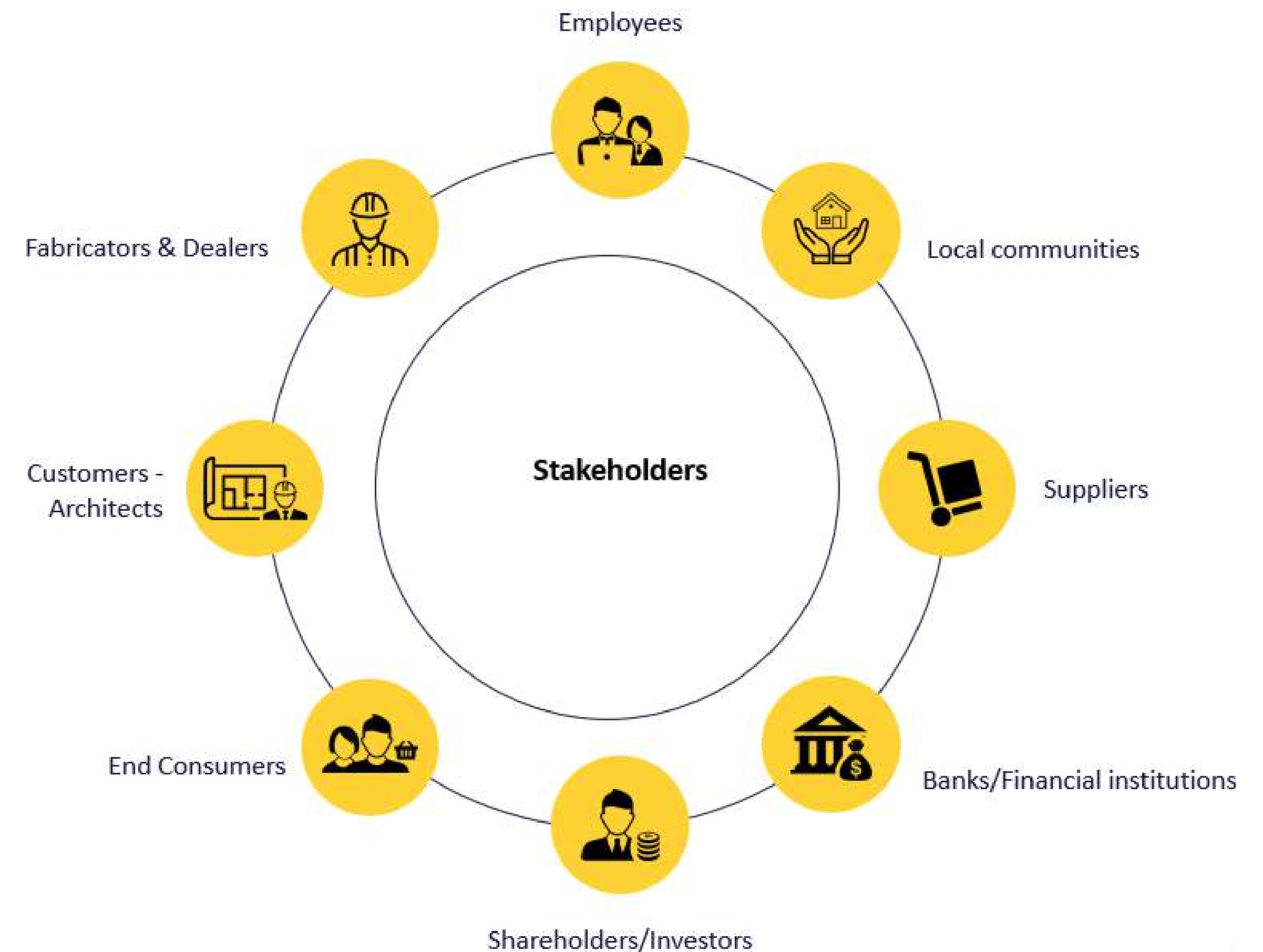
3. Sustainability Strategy

3.1 Stakeholders & Material Topics

As part of its responsible business strategy, in 2024 ALUMIL Group implemented a comprehensive methodology to identify material topics, considering their impact on both stakeholders and the Group itself.

This methodology was aligned with the principles of Double Materiality as defined by the European Sustainability Reporting Standards (ESRS). Its purpose was to identify topics with significant impact materiality (on society and the environment) as well as financial materiality (on company performance).

Using tailor-made questionnaires, ALUMIL gathered stakeholder feedback on the importance of various sustainability issues. The process also included active engagement with Senior Management to ensure internal alignment of strategic priorities.



Material issues, ALUMIL 2024		
E	ESRS E1	Climate change adaptation
		Energy management & GHG emissions
	ESRS E3	Water resources management
	S	ESRS S1
Occupational health & safety		
ESRS S2		Responsible supply chain management
ESRS S4		Product and service quality
	User/customer safety	
G	ESRS G1	Transparency & Compliance with laws and regulations

The materiality analysis for 2024 reflected stakeholder perceptions and priorities, highlighting the need for a more targeted and tailored approach to sustainability. Through this process, nine key material topics were identified, which will serve as the foundation for the Group’s future action planning and the continued strengthening of its sustainability strategy.

The Group also recognizes as permanently material the topics of climate change adaptation and energy/emissions management (under ESRS E1) and water management (under ESRS E3). These have a critical impact not only on operational performance but also on society and the environment — and are directly linked to the adaptation to climate change (ESRS E1) and to the need for resilience against physical and transition risks.

Occupational Health and Safety, as well as Employee Training and Development, are also recognized as critical matters in accordance with the ESRS S1 standard. This is reflected through the implementation of strict protocols and investments in skills development. Under ESRS S2, Responsible Supply Chain Management was highlighted as a key focus area.

Furthermore, ESRS S4 places particular emphasis on Product and Service Quality and User and Customer Safety, elements that strengthen the trust and satisfaction of end recipients.

At the same time, through ESRS G1, Transparency and Compliance with applicable laws and regulations are recognized as fundamental pillars of responsible business conduct.



3.2 Sustainability Goals

ALUMIL Group has established a comprehensive sustainability strategy, articulated through clearly defined and time-bound goals, spanning the short and long term. These goals are fully embedded into the company's operations and serve as a core implementation tool for its ESG commitments.

Short-Term Goals

- ◆ Integration of digital tools for ESG indicator tracking and evaluation, enhancing transparency and reporting efficiency.
- ◆ Company-wide implementation of preventive Health & Safety measures, aiming for the elimination of workplace accidents.
- ◆ Expansion of employee training programs in areas such as sustainability, safety, and emerging technologies.
- ◆ Incorporation of ESG criteria in supplier evaluation and selection, to foster a more sustainable supply chain.
- ◆ Strengthening of the Corporate Social Responsibility (CSR) program, with emphasis on supporting vulnerable groups and promoting social inclusion.
- ◆ Development of collaborations with research institutions and universities to foster innovation in low-carbon products and processes.

- ◆ Operation of photovoltaic systems in the Group's facilities in Albania and Serbia from 2025, enhancing the share of renewable energy sources.
- ◆ Increase in the percentage of recycled aluminium used in architectural profiles, with the aim of consistently exceeding the Loop 60 level.
- ◆ Fleet electrification, with at least 25% of new vehicles being electric or plug-in hybrid, accompanied by the installation of charging stations.
- ◆ Enhancement of equality and inclusion policies, promoting a fair and inclusive work environment with equal opportunities for all.
- ◆ Promotion of compliance with international health & safety standards in the workplace.

Long-Term Goals

- ◆ Reduction of CO₂ emissions by 55% for the parent company (base year: 2022) and 30% for the rest of the Group (base year: 2024) by 2030.
- ◆ Achieve net-zero carbon emissions by 2050, through intermediate targets for 2030 and 2040.
- ◆ Cover at least 30% of total energy consumption with Renewable Energy Sources by 2030.
- ◆ Adopt and implement smart energy systems to optimize energy management across operations.
- ◆ Foster innovation partnerships with research centers and universities, focusing on low-carbon technologies and circular economy practices.



4. Environment

- 6

CLEAN WATER
AND SANITATION


- 7

AFFORDABLE AND
CLEAN ENERGY


- 9

INDUSTRY, INNOVATION
AND INFRASTRUCTURE


- 12

RESPONSIBLE
CONSUMPTION
AND PRODUCTION


- 13

CLIMATE
ACTION


- 15

LIFE
ON LAND





100%

Of the parent company’s production
waste is recycled



162,976 MWh

Total Group energy
consumption



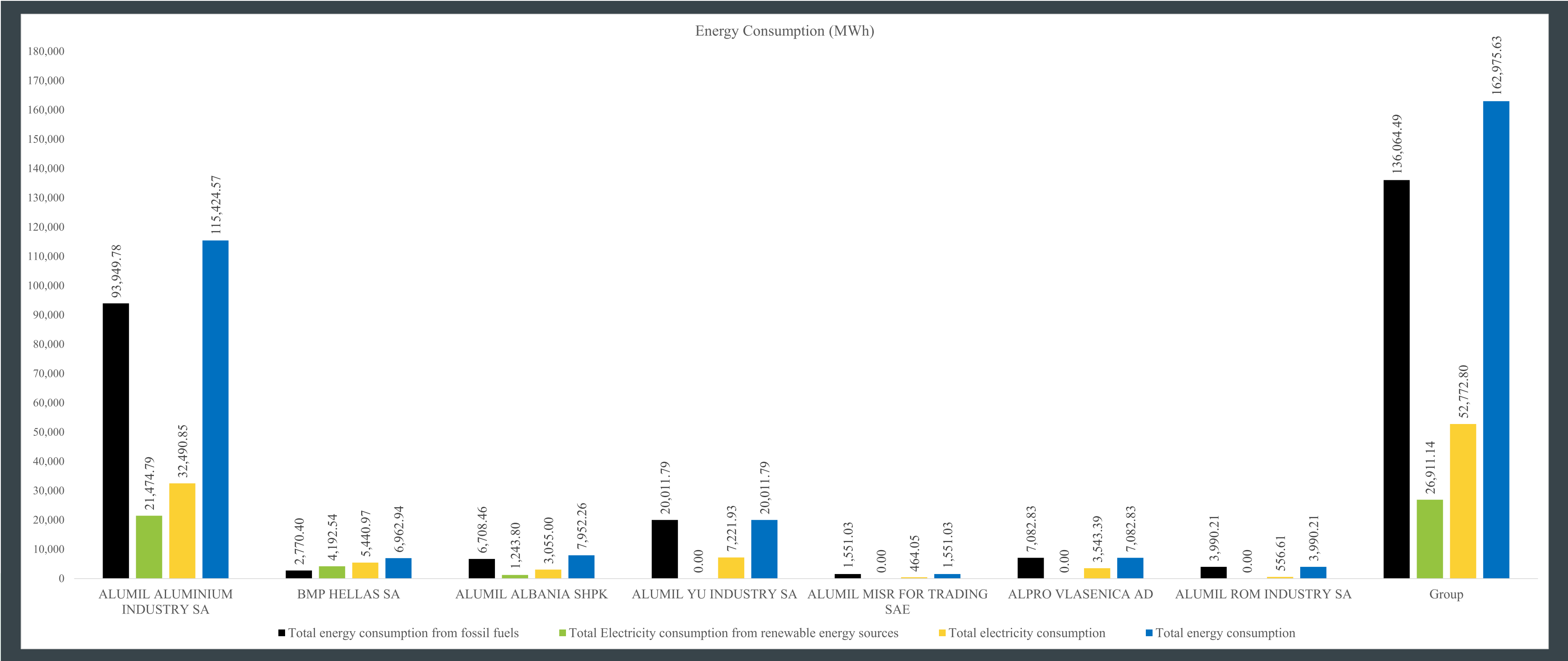
669,803 tn CO₂ eq
Total Group GHG emissions
(Scope 1 + 2 + 3, market-based)



1,078 m³/€ million
Water consumption intensity

4.1 Energy Management

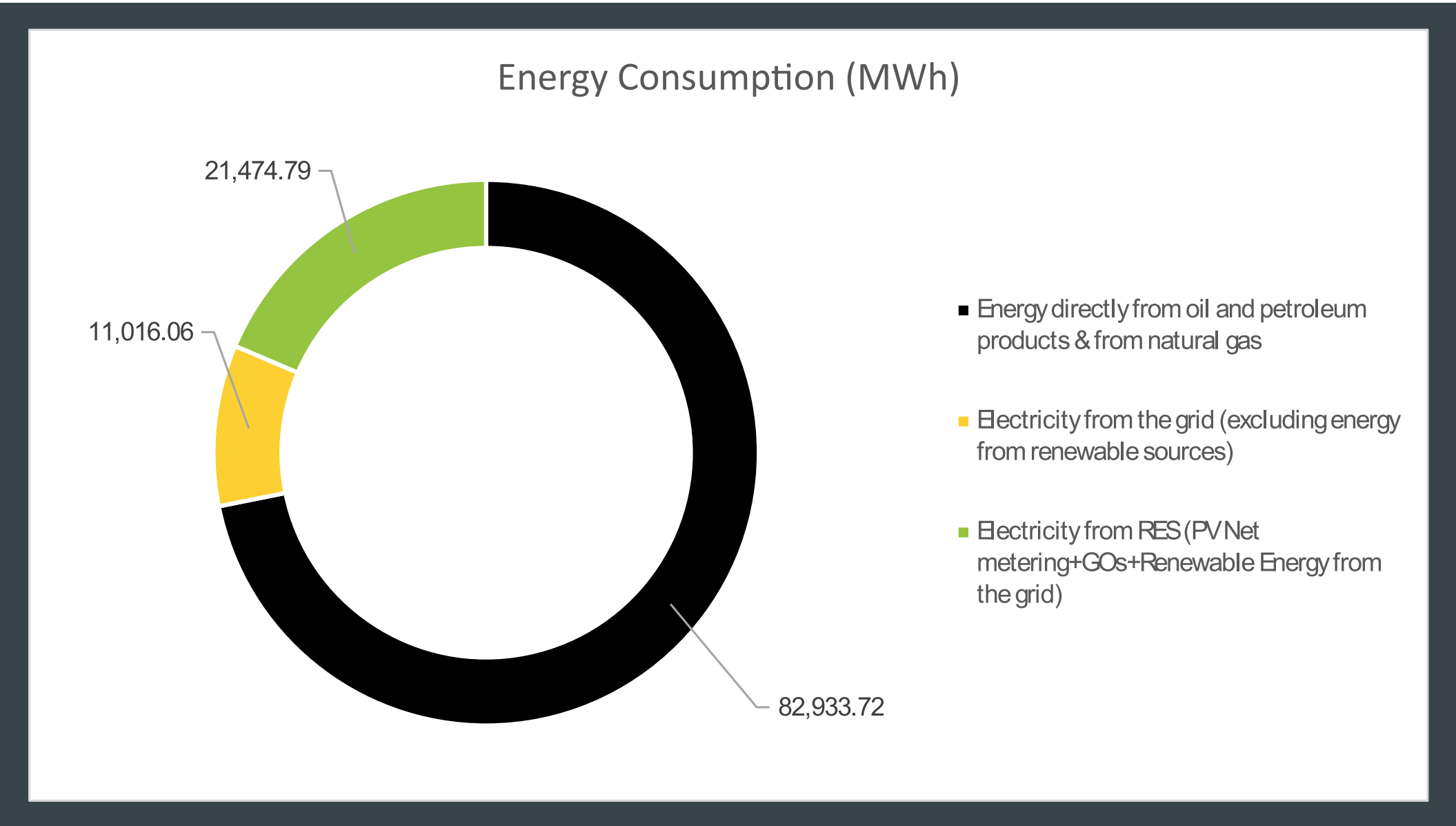
ALUMIL Group recognizes the critical importance of efficient energy management across its facilities and adopts practices to optimize energy use in line with financial performance and profitability. Parent Company is certified under the Energy Management System EN ISO 50001:2018. Investments have been made in Power Quality Optimization Systems (PQOS) to enhance energy efficiency in the foundry and anodizing units. In addition Photovoltaic systems with capacity of 100kW have been installed on the foundry rooftop, and an additional 50kW on the headquarters in Efkarpia. In 2025, the Group plans to sign Power Purchase Agreements (PPAs) for sourcing electricity exclusively from Renewable Energy Sources, aiming to increase the share of renewable energy sources beyond the current 16.5% of the Group's total energy mix. This performance is aligned with the Group's carbon reduction roadmap, targeting a 30% emissions reduction by 2030 and decreased dependency on fossil fuels.



The majority of the Group’s total energy consumption—specifically 70.8%—is attributable to the parent company. For the year 2024, the total energy consumption of the parent company, ALUMIL ALUMINIUM INDUSTRY SA, amounted to 115,424.57 MWh, of which 32,490.85 MWh related to electricity consumption.

Out of this amount of electricity, 21,474.79 MWh originated from renewable energy sources, while 11,016.06 MWh came from fossil fuels.

As a result, the share of renewable energy in the total energy consumption of the parent company in 2024 stood at 18.6%, in alignment with the Group’s Transition Plan to reduce emissions by 30% by 2030 and to lower its dependency on non-renewable energy sources.



The chart above presents the breakdown of the energy consumption of the parent company, ALUMIL ALUMINIUM INDUSTRY SA, by energy source.

To monitor the efficient use of energy consumption of the parent company, an indicator is applied that links its economic performance with energy consumption, specifically expressed as MWh per million euros of turnover.

In 2024, energy use was more efficient compared to 2023, as reflected in the 3.07% reduction in the total energy consumption intensity indicator. A corresponding decrease in consumption intensity for 2024 was also observed for both electricity and thermal energy, by 1.87% and 3.53% respectively.

Year	2023	2024	Decrease / Increase
Total energy consumption (MWh)	112,121.63	115,424.57	+2.95 %
Electricity consumption (MWh)	31,176.59	32,490.85	+4.22 %
Thermal energy consumption (MWh)	80,945.04	82,933.72	+2.46 %
Turnover (€ millions)	238.90	253.72	+6.20 %
Total energy consumption intensity (MWh/€ million)	469.32	454.93	-3.07 %
Electricity consumption intensity (MWh/€ million)	130.50	128.06	-1.87 %
Thermal energy consumption intensity (MWh/€ million)	338.82	326.87	-3.53 %



Recycled Aluminium – Loop 60 & Loop 80

Loop 60 is the first certified recycled aluminium in Greece for architectural profiles, composed of 60% recycled material. Building on its success, ALUMIL introduced Loop 80, made from 80% recycled content, further strengthening its commitment to sustainability and the development of low-carbon products. Loop 80 achieves 87% reduction in CO₂ emissions compared to the European average for primary aluminium production. Both Loop 60 and Loop 80 are certified by TÜV Austria. All ALUMIL architectural aluminium systems are now produced under the Loop 60 certification standard.

Important benefits of Loop 60 and Loop 80



Reduction in raw material extraction and waste generation

Reuse of existing aluminium, eliminating the need for bauxite mining, while also reducing the amount of waste generated



–95% energy consumption

Secondary aluminium production from recycled material is significantly less energy-intensive compared to primary production



–76% CO₂ emissions
Loop 60

Compared to the global average of primary aluminium production



–87% CO₂ emissions
Loop 80

Compared to the global average of primary aluminium production

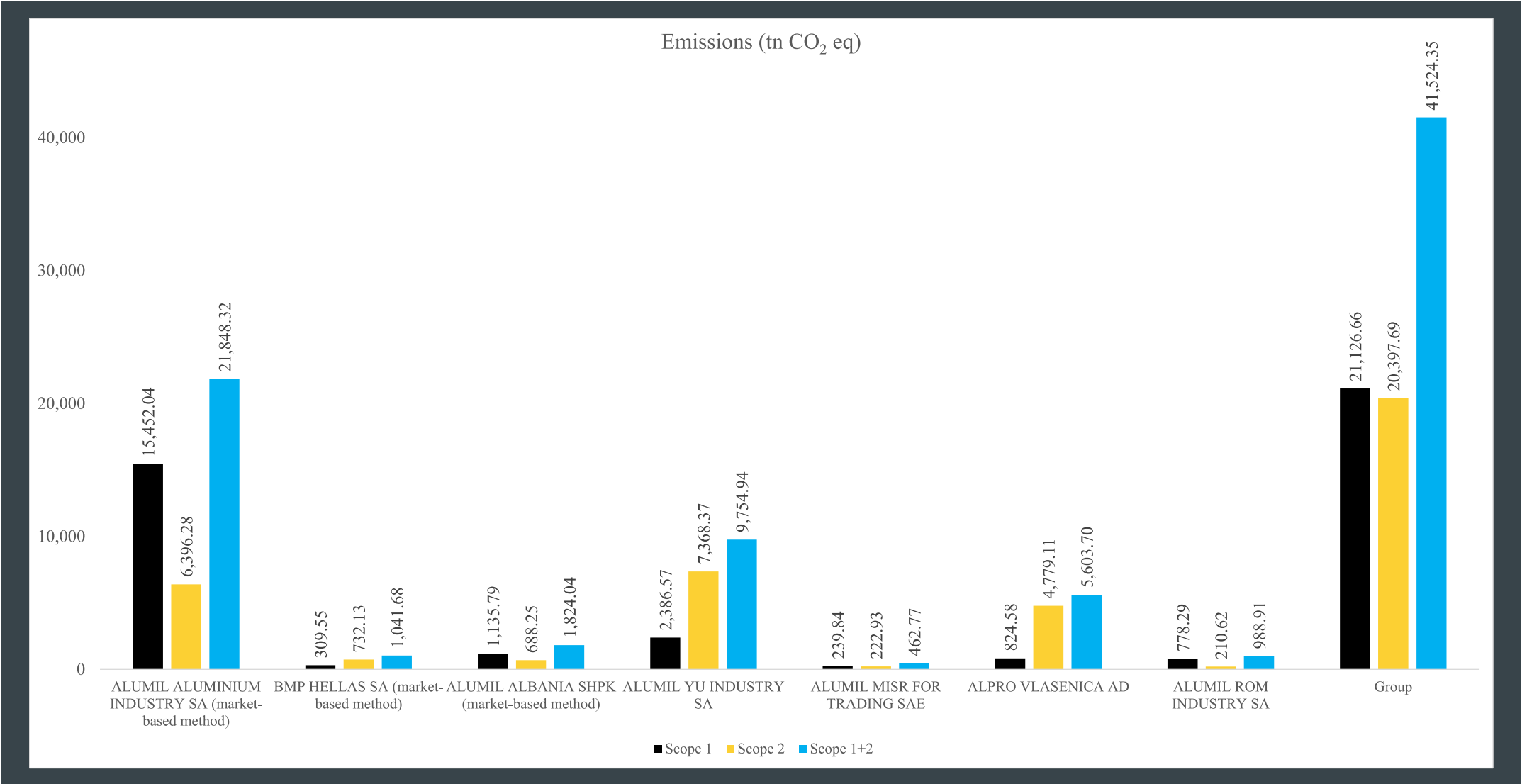
4.2 Greenhouse Gas (GHG) Emissions

ALUMIL Group, in alignment with the European commitments toward achieving climate neutrality by 2050 and reducing greenhouse gas emissions, has published emission reduction targets aiming for net-zero emissions by 2050. To achieve this target, intermediate reduction goals have been set: 55% emissions reduction for the parent company and 30% for the Group by 2030, using 2022 and 2024 as base years respectively.

Within this context, the Group has implemented key monitoring and emissions management measures for Scope 1 & 2 using the GHG Protocol, the guidelines of the Greek National Climate Law (Law 4936/2022), and ISO 14064-1:2018, ensuring transparency and accuracy in emissions management.

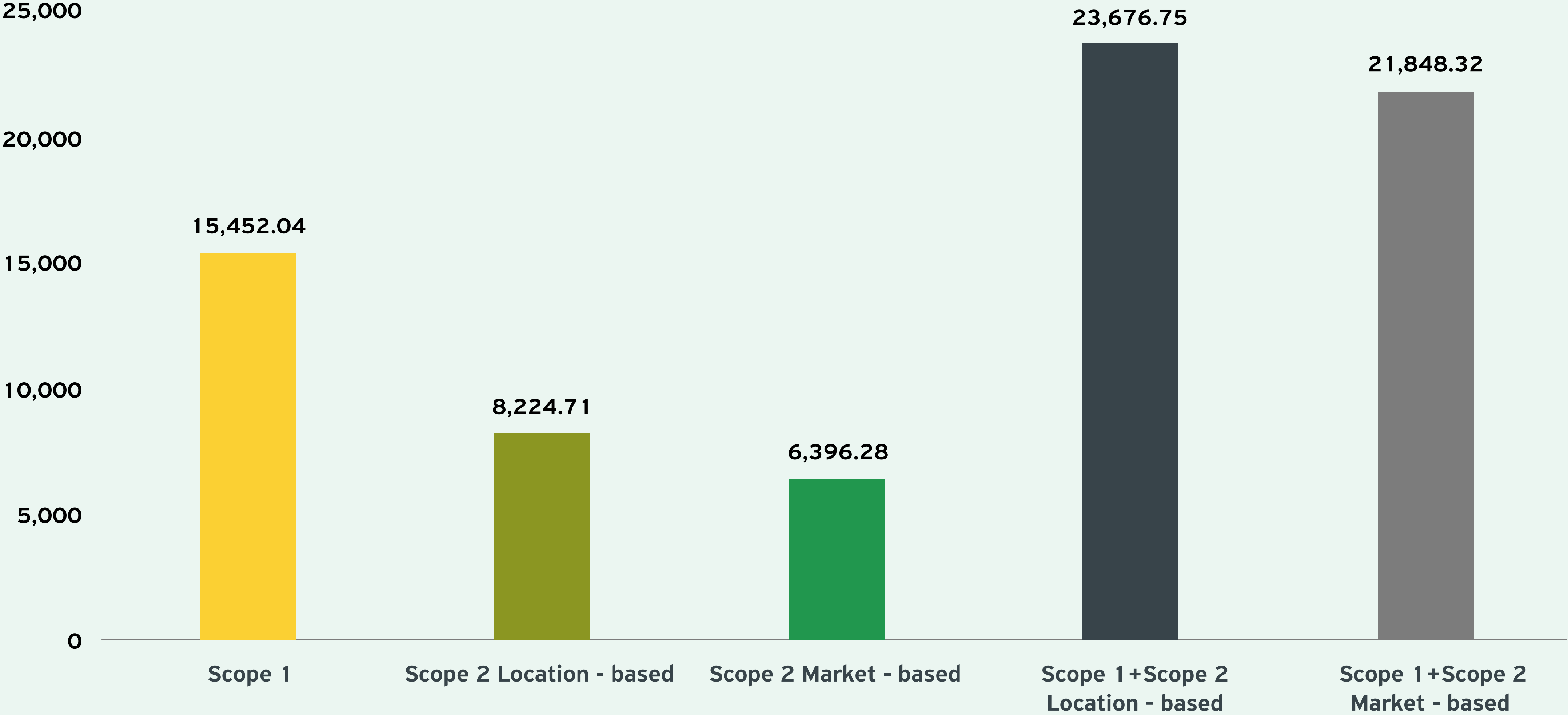
Scope 1 emissions for the Group in 2024 amounted to 21,126.66 tn CO₂ eq (metric tons of carbon dioxide equivalent). Scope 2 emissions amounted to 20,397.69 tn CO₂ eq (market-based approach) and 21,312.24 tn CO₂ eq (location-based approach). Total greenhouse gas emissions for the Group in 2024 amounted to 41,524.35 tn CO₂ eq (market-based) or 42,438.90 tn CO₂ eq (location-based).

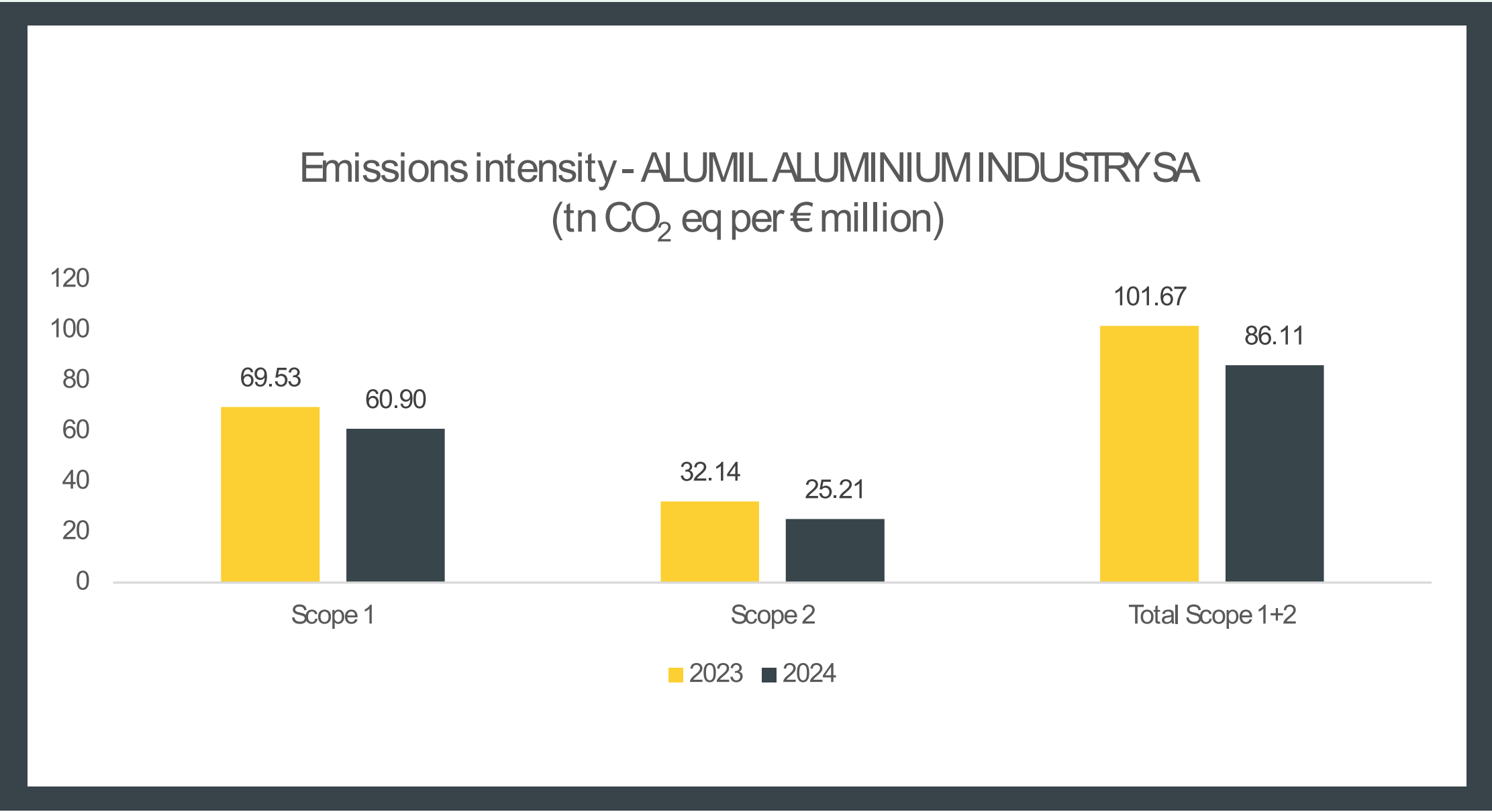
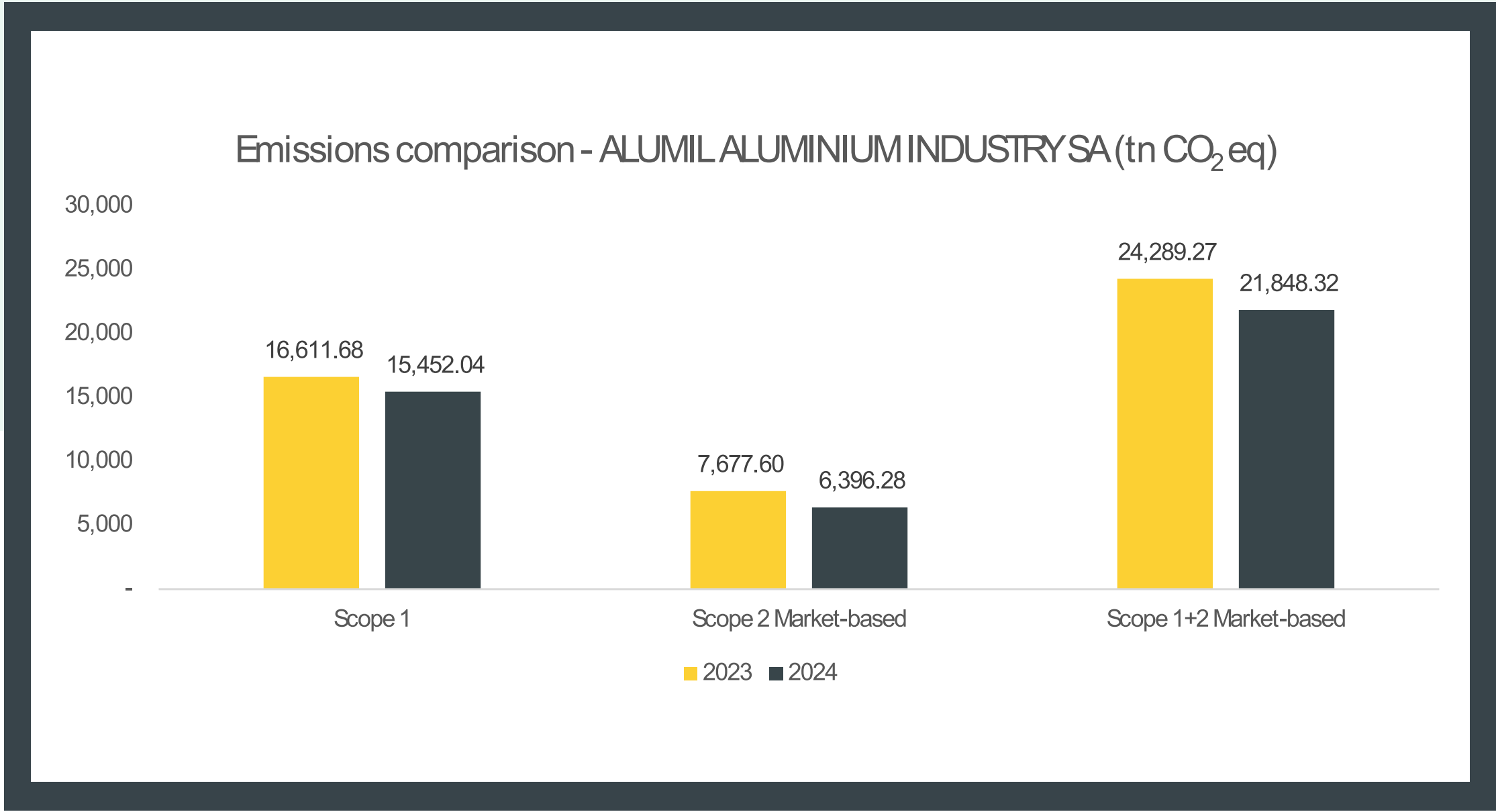
Regarding Scope 3 emissions for the Group in 2024, these amounted to 628,278.55 tn CO₂ eq and concern the entire value chain as defined by operational control. It is worth noting that 95% of Scope 3 emissions relate to the purchase of goods and services.



The total CO₂ emissions for the Group in 2024 amounted to 669,802.90 tn CO₂ eq (market-based) for Scopes 1, 2 and 3. 52.6% of the total Scope 1 & 2 emissions (market-based) produced by the Group originated from the parent company ALUMIL ALUMINIUM INDUSTRY SA. Total greenhouse gas emissions of the parent company for 2024 were reduced compared to 2023 by 10% and amounted to 21,848.32 tn CO₂ eq, of which 15,452.04 tn CO₂ eq correspond to Scope 1 and 6,396.28 tn CO₂ eq to Scope 2. Respectively, for the year 2024, Scope 1 & 2 emissions decreased by approximately 7% and 17% respectively compared to 2023. The reduction in Scope 1 & 2 as well as total emissions is also reflected through the emissions intensity indicator, expressed in tn CO₂ eq / € million turnover, which shows a reduction of 12.4% and 21.5% respectively for Scope 1 & 2, and a total reduction of 15.3% for Scope 1 & 2, always using the market-based method.

Total emissions (tn CO₂ eq) - ALUMIL ALUMINIUM INDUSTRY SA





Year	2023	2024	% Decrease / Increase
Turnover (€ million)	238.9	253.72	+6.20 %
Scope 1 (tn CO ₂ eq)	16,611.68	15,452.04	-6.98 %
Scope 2 (market-based) (tn CO ₂ eq)	7,677.60	6,396.28	-16.69 %
TOTAL (tn CO ₂ eq)	24,289.27	21,848.32	-10.05 %
Scope 1 (tn CO ₂ eq / € million)	69.53	60.90	-12.41 %
Scope 2 (market-based) (tn CO ₂ eq / € million)	32.14	25.21	-21.56 %
TOTAL (tn CO ₂ eq / € million)	101.67	86.11	-15.30 %

4.3 Water Resources Management

In the context of water resources management, the company is committed to adopting an official Water Resources Policy (ESRS E3) by 2025, implementing technologies for water reuse and consumption optimization, with the aim of conserving and protecting water.

Within this framework, recirculation and reuse technologies are already being applied at the Group's facilities, reducing the required volumes of water consumption.

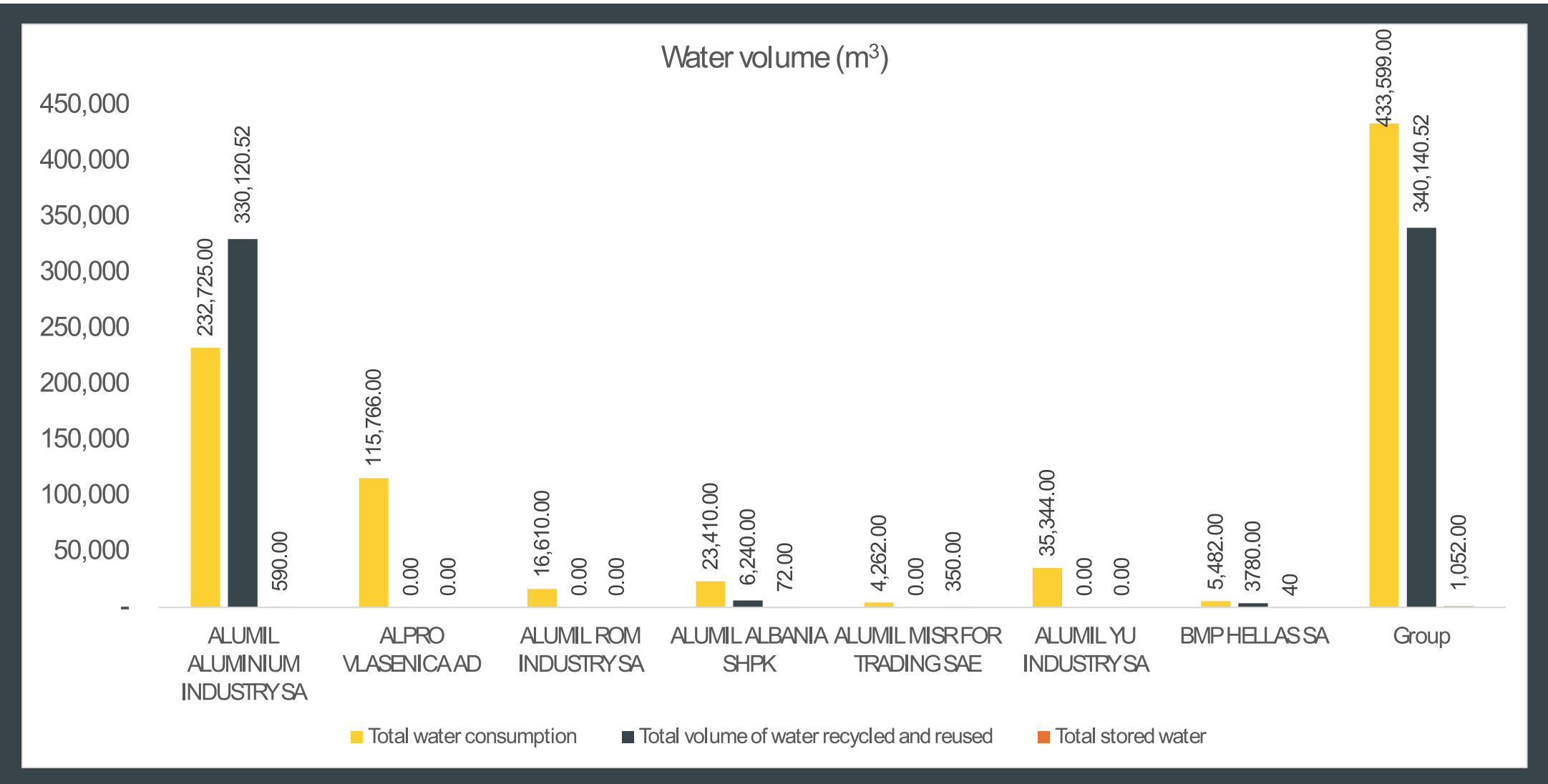
At the same time, all liquid waste resulting from the production processes of the parent company is treated and its final disposal is carried out exclusively through the biological treatment plant of the Kilkis Industrial Area, ensuring complete avoidance of environmental discharge.

The water needs of the parent company are mainly covered by the water supply network of the Kilkis Industrial Area (VI.PE.), where its main production complex is located. This industrial zone has been developed in an area not classified as an environmental protection zone or a biodiversity-sensitive area, according to the Natura 2000 database.

For the parent company, the total volume of recycled and reused water in 2024 amounted to 330,120.52 m³.

At the same time, the Group applies water recycling and reuse practices in its industrial operations beyond the parent company as well. As a result, in 2024 the total recycled and reused volume of water reached 340,140.52 m³, corresponding to 44% of the total water used (773,739.52 m³) during the reporting year.

For the 2024 reporting year, the parent company ALUMIL ALUMINIUM INDUSTRY SA achieved the highest percentage of recycled and reused water volume within the Group, with almost 59% of the total managed water volume of the company being recycled or reused. The total water volume managed by the company during 2024 amounted to 562,845.52 m³. During 2024, a total of 1,052 m³ of water was stored across the Group.



5. Society



22.2 %
Women employees



11
Big CSR actions



0
fatalities

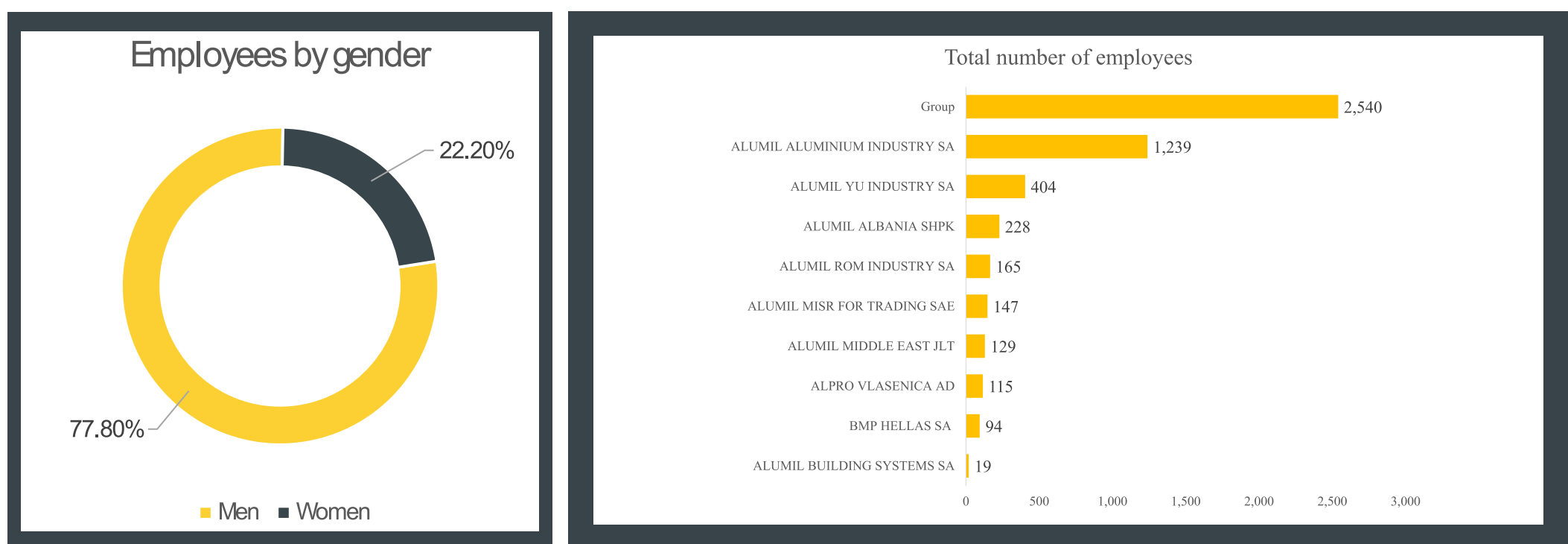


14
Average training hours
per employee

5.1 Workforce & Employee Benefits

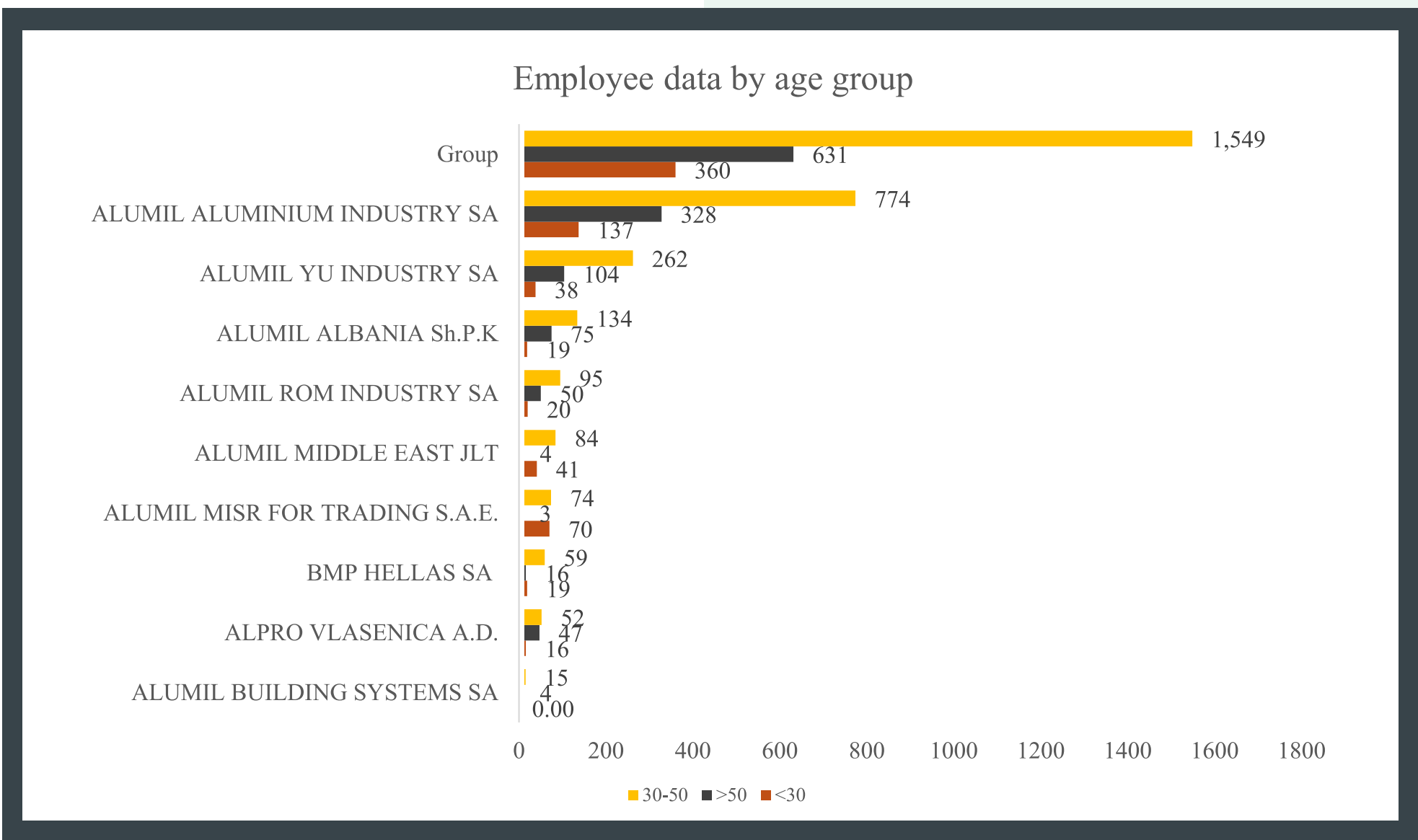
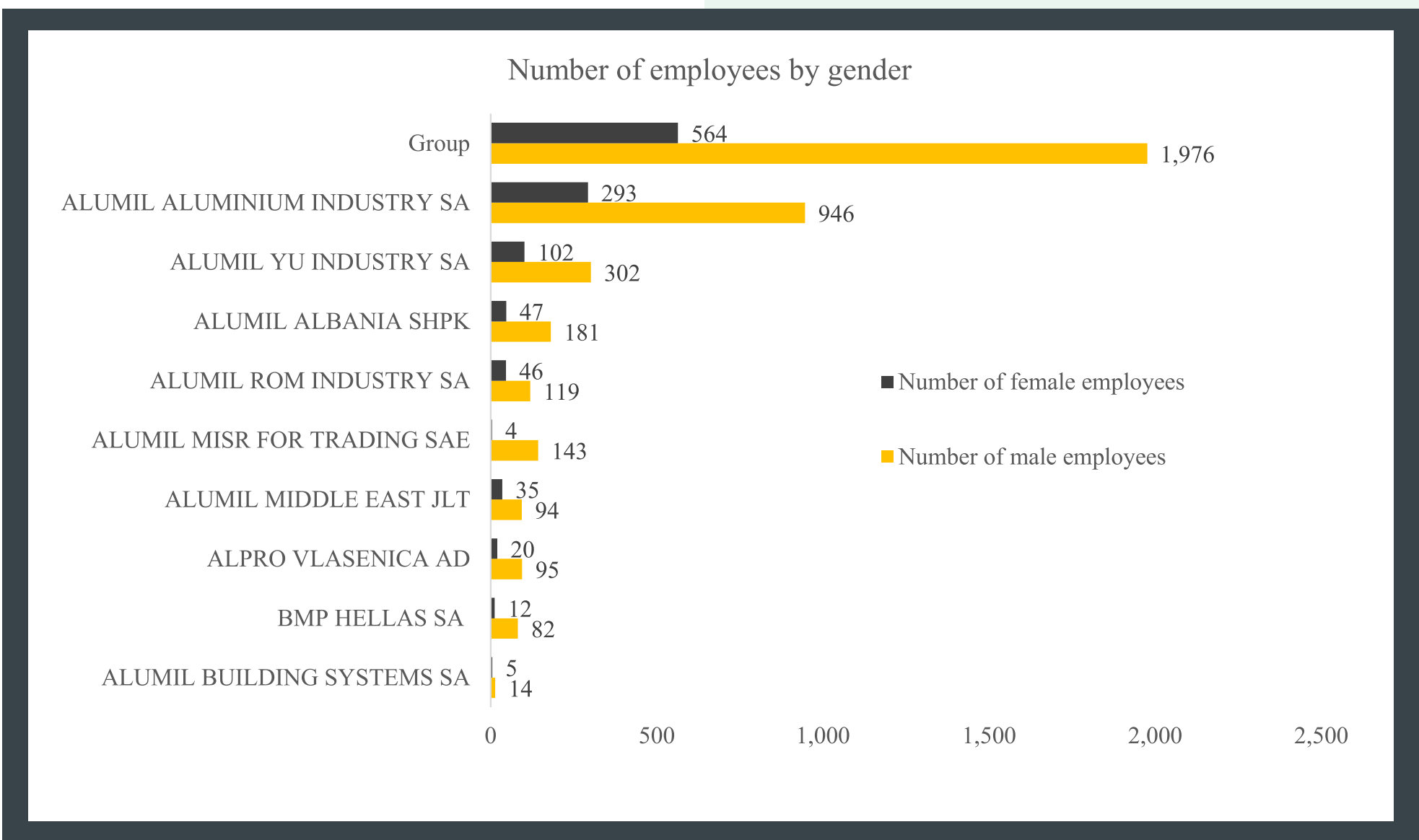
ALUMIL Group recognizes its human capital as a key driver of growth and a source of competitive advantage. Within the context of a rapidly evolving market, the Group is committed to creating a supportive, safe, and fair working environment, consistently investing in the empowerment of its people.

In 2024, the total number of employees across the Group reached 2,540*, of which 77.8% were men (1,976) and 22.2% women (564), while the average headcount for the year was 2,520 employees.



The age distribution of employees shows that most belong to the 30–50 age group, with 1,549 employees (61%), followed by those over 50 with 631 employees (25%), and finally, employees under 30 numbered 360, slightly more than 14%.

*The scope includes the parent company and all subsidiaries with production facilities, as well as all other subsidiaries with significant societal impact or substantial economic activity.



Regardless of contract type, all employees are covered by collective labor agreements. 94.6% of employees are employed under permanent contracts, affirming the Group’s commitment to long-term employment relationships.

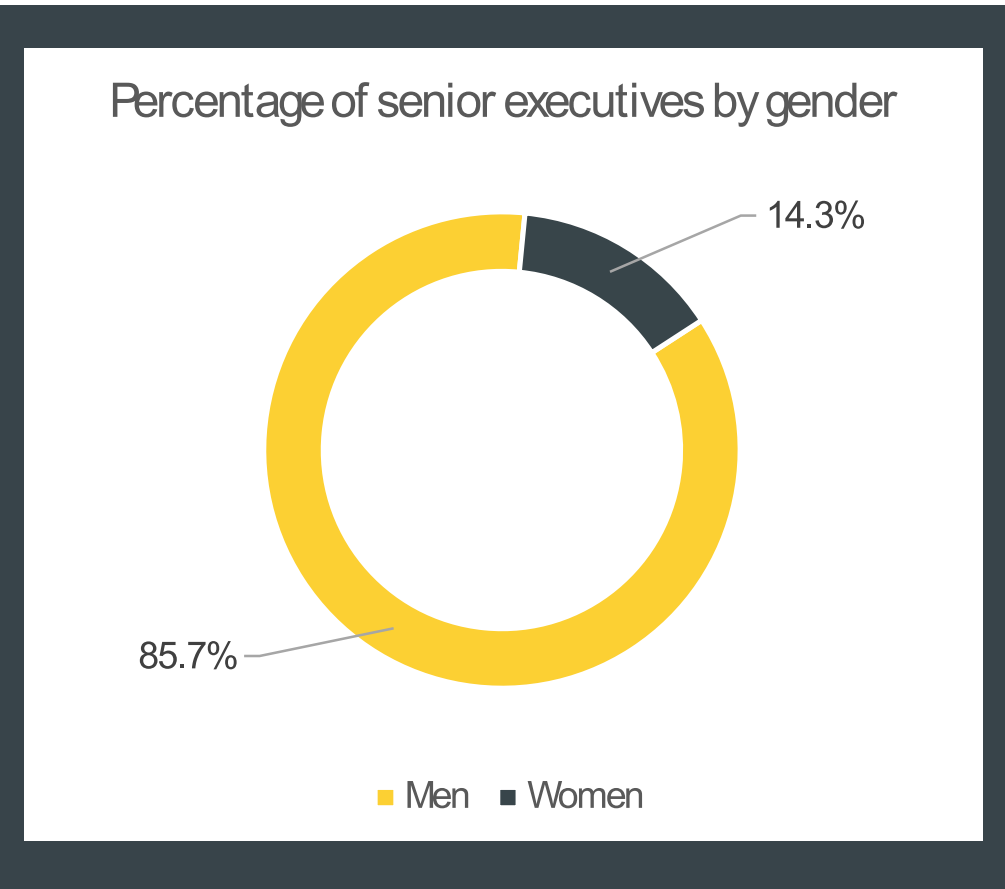
The number of male employees with permanent contracts is 1,865, and female employees with permanent contracts number 538. Respectively, male employees with fixed-term contracts are 111, and female employees are 26.

Company	Permanent Contracts	Fixed-term Contracts
ALUMIL ALUMINIUM INDUSTRY SA	1,234	5
ALUMIL YU INDUSTRY SA	334	70
ALUMIL ALBANIA SHPK	228	0
ALUMIL ROM INDUSTRY SA	164	1
ALUMIL MISR FOR TRADING S.A.E.	95	52
ALUMIL MIDDLE EAST JLT	129	0
ALPRO VLASENICA A.D.	106	9
BMP HELLAS SA	94	0
ALUMIL BUILDING SYSTEMS SA	19	0
GROUP	2,403	137

As regards senior executives, the total number of men in executive positions is 12, while women in such positions are 2. Therefore, the proportion of senior management roles is 85.7% male and 14.3% female.

ALUMIL Group actively promotes work-life balance, offering 100% of its employees the opportunity to take leave for family-related reasons. During the reporting period 31

women took maternity leave (5.5% of the female workforce), 40 men took paternity leave (2.0% of the male workforce), 76 men and 85 women took parental leave and 19 men and 17 women used caregiver leave to support family members (1.0% of male staff and 3.0% of female staff respectively). Full compliance with labor legislation, combined with additional benefits beyond legal obligations, reflects the company’s respect for maintaining a healthy work-life balance.



5.2 Human Rights and Non-Discrimination

At ALUMIL Group, the protection of human rights and the active prevention of discrimination are non-negotiable values and fundamental pillars of a fair, responsible, and sustainable business path.

The Group aims to offer all employees a working environment characterized by safety, dignity, equal opportunities and respect for diversity — regardless of gender, race, age, disability, religion, sexual orientation or socio-economic background.

The Group implements a clear non-discrimination policy framework, which governs all internal processes — from recruitment and evaluation to career advancement and compensation.

Specifically, the company ensures objective, merit-based, and transparent selection and evaluation criteria, and applies an equal opportunities policy.

5.3 Employee Training and Development

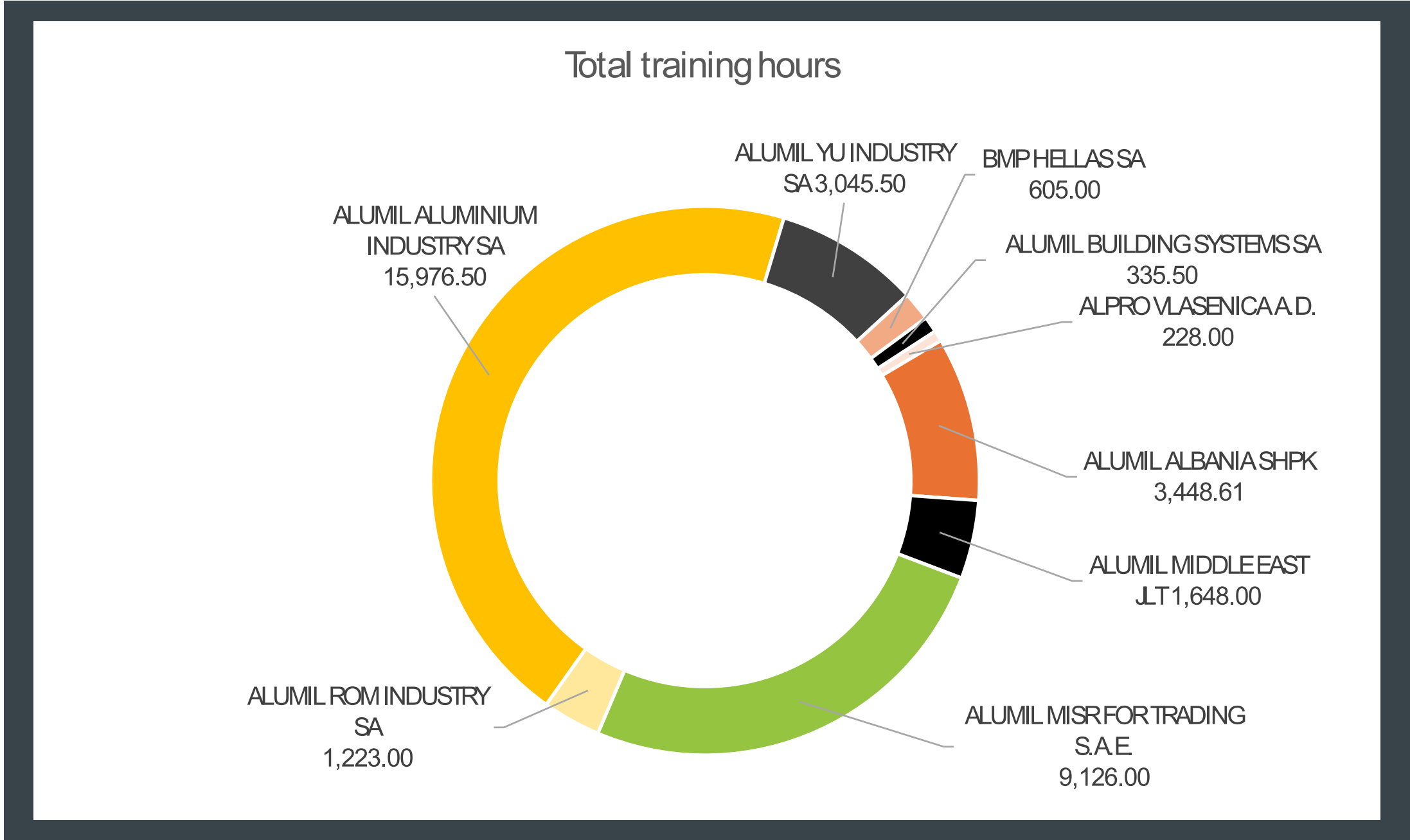
In 2024, a total of 35,636.11 training hours were recorded across ALUMIL Group companies, with an average of 14.03 hours per employee.

The parent company, ALUMIL ALUMINIUM INDUSTRY SA, accounted for the highest total number of hours (15,976.5 hours), while the subsidiary ALUMIL MISR FOR TRADING SAE recorded the highest average training hours per employee.

For senior management, the average training duration was 35.2 hours, while for all other employee categories it was 13.91 hours.

The total funding allocated to training initiatives amounted to €178,073, confirming the Group’s ongoing commitment to empowering its people through targeted learning and development opportunities.

Additionally, the average training hours per employee stood at 16 hours for women and 13.40 hours for men.



- The training programs covered a broad range of skills, structured into three main pillars:
- Soft skills: leadership, collaboration, accountability, time and project management, problem-solving, communication.
 - Technical skills: Microsoft Advanced Excel, ISO 50001:2018 compliance, façade design, evacuation drills, crane operation, defensive driving.
 - Strategic focus areas: digital transformation, health & safety awareness, inclusive culture and zero-tolerance approach to discrimination.

5.4 Health and Safety of Employees and Consumers

The Group has invested in Health & Safety matters to safeguard the resilience of its business model and has developed a comprehensive Health & Safety Policy, aimed at preventing workplace accidents and occupational illnesses. This policy is supported by a certified Management System in accordance with ISO 45001:2018, implemented at the Group's largest production facility in Kilgis.

In 2024, a total of 34 workplace accidents were recorded across the Group, corresponding to 1,223 lost working days.

The frequency and severity of accidents are reflected through the Accident Frequency Rate (AFR) and Accident Severity Rate (ASR) indicators, which are internationally used to depict the frequency of workplace accidents in relation to working time, and to measure the severity of accidents based on the number of lost workdays due to injuries, respectively.

The use of these indicators complies with the regulatory requirements of the international ESRS S1 standard (Own Workforce), which defines the mandatory disclosure of data related to workplace accidents. In 2024, the AFR for the parent company was 2.21, while the ASR was 10.25.

Product Quality and Safety

ALUMIL Group also makes substantial investments in ensuring the quality and safety of its products throughout their entire lifecycle — from design to final use by the consumer.

Recognizing the importance of product quality, safety, and consumer trust, the Group has embedded responsibility toward consumers and the market as a core commitment. Through in-house testing laboratories, products are checked across every stage of the production process, and strict quality controls are also conducted on products not manufactured directly by the Group.

In addition, the Group has a materials management system, monitoring every step of the production process and applying improvements wherever necessary. At the same time, the Group maintains a Complaint Form, through which consumers and end users can directly submit their concerns.

In 2024, no product recalls were recorded — a fact that confirms the Group's dedication to delivering reliable, safe, and high-quality aluminium solutions for architectural and industrial applications.

This commitment to end-user safety enhances the Group's reputation and constitutes a key factor in maintaining trust-based relationships with customers and partners.

5.5 Social Impact & CSR Actions

The Group remains firmly committed to creating value for society through the implementation of projects that leave a positive social and environmental footprint.

Environment



ALUMIL signed a two-year Memorandum of Understanding with the American Farm School, aiming at the joint implementation and promotion of environmental and social initiatives of mutual interest.



The ALUMIL Green Ambassadors team, established to promote environmentally friendly practices, carried out voluntary cleanup and reforestation actions.



ALUMIL also participates in RecAL, a Horizon Europe project that marks a breakthrough in aluminium recycling.

Society



Donation of all architectural systems used in the construction of the new polyclinic of Medecins du Monde.



Driven by a shared goal — to improve people’s quality of life — we initiated a partnership with the Galilee Palliative Care Centre, aiming to support and raise awareness for its humanitarian mission.



Support was also provided to the newly established “New Life” (Nea Zoi) association, active in the Kilikis region, which offers vital assistance to abused women and single-parent families.

Full renovation of the Childcare center at the Thessaloniki Port area



6. Governance

12 RESPONSIBLE CONSUMPTION AND PRODUCTION

16 PEACE, JUSTICE AND STRONG INSTITUTIONS

17 PARTNERSHIPS FOR THE GOALS



40%

Women at the Management Board



5

Members at the Management Board



0 €

Total amount of fines for violations of anti-corruption and anti-bribery laws

6.1 Organization and Management of ALUMIL Group

Ensuring proper operation, safeguarding the interests of stakeholders, and maintaining the good corporate reputation of the ALUMIL Group are based on strong corporate governance structures. The Group operates on the basis of the principles of transparency, accountability, and diversity in decision-making, shaping a modern and functional governance framework. The establishment of regulatory frameworks and corporate governance policies lays the groundwork for a holistic and effective governance system, in alignment with Law 4706/2020 and in accordance with global standards and leading practices.

Board of Directors

The Board of Directors of ALUMIL consists of five (5) members, who are elected by the General Assembly for a five-year term (12.07.2021 – 11.07.2026). The composition of the Board includes two (2) executive and three (3) non-executive members, of whom two (2) are independent, in accordance with the provisions of Law 4706/2020. ALUMIL places particular emphasis on ensuring balanced representation and diversity in the composition of the Board of Directors. Forty percent (40%) of the members are women — a percentage that exceeds the minimum legal quota of 25%, reinforcing pluralism and representativeness in the company’s highest governing bodies.

Name	Position / Capacity	Start of Term	End of Term
Georgios Mylonas	President & CEO, Executive Member	12.07.2021	11.07.2026
Georgios Doukidis	Vice President, Non-Executive Member	12.07.2021	11.07.2026
Evangelia Mylona	Executive Member	12.07.2021	11.07.2026
Athanasios Savvakis	Independent Non-Executive Member	12.07.2021	11.07.2026
Loukia Saranti	Independent Non-Executive Member	12.07.2021	11.07.2026

6.2 Business Ethics

Business ethics and transparency are fundamental pillars of ALUMIL Group's operations, which consistently seeks to implement high standards of ethical and regulatory compliance. The Group's philosophy is based on respect for human rights, the fight against corruption and the building of trust with all stakeholders.

At the same time, a responsible payment policy is implemented, with strict adherence to agreed terms. Transactions are carried out via bank transfers or cheques, with priority given to maintaining stable partnerships.

6.3 Company Codes and Policies

ALUMIL Group has adopted a robust framework of policies and regulations, reflecting the company's values of corporate responsibility and embedded across all aspects of its governance and business operations.

- ◆ The minimum notification period regarding operational changes is defined by legislation. ALUMIL fully complies with this and adheres to the respective timelines.
- ◆ The Board of Directors decides on ESG goals following recommendations from the responsible executives.
- ◆ Alumil has set targets regarding its performance in governance, such as compliance with the corporate governance law and best practices.

This framework not only aims at legal compliance, but also at cultivating a corporate culture of integrity, transparency and sustainable development.

Each policy is accompanied by clearly defined procedures, performance indicators and monitoring mechanisms, while compliance oversight is assigned to the relevant departments and committees (Legal Department, Regulatory Compliance Division, Audit Committee).

The Group has established a comprehensive body of policies and regulatory documents, which includes, among others:

- ◆ Internal Operating Regulation
- ◆ Corporate Governance Code
- ◆ Code of Ethics and Business Conduct
- ◆ Regulatory Compliance Policy
- ◆ Whistleblowing Policy
- ◆ Sustainable Development Policy
- ◆ Health, Safety & Environment Policy
- ◆ Climate Change Policy
- ◆ Employee Training & Development Policy
- ◆ Board of Directors' Suitability Policy
- ◆ Board of Directors' Remuneration Policy
- ◆ Personal Data Protection Policy
- ◆ Supplier Code of Conduct

6.4 Anti-Corruption

ALUMIL Group applies a zero-tolerance policy toward incidents of corruption, bribery, abuse of power or conflict of interest, thereby strengthening its reputation as a responsible and transparent organization. This framework is shaped by a set of policies and procedures aligned with the principles of the United Nations Convention Against Corruption, as well as the provisions of national legislation and European directives.

At the core of this strategy lies the Code of Ethics and Business Conduct, which sets the foundations for ethical behavior and serves as a guide for all employees, members of the Board of Directors, and external partners. In parallel, the Whistleblowing Policy provides a secure, confidential, and independent channel for reporting incidents of fraud, corruption or violations of internal operating rules.

Reports are immediately reviewed by independent bodies or committees that are not part of the management chain of the subject under review. Relevant information is forwarded to the appropriate management and supervisory bodies to ensure transparency and accountability, with full protection of whistleblowers and no retaliation. The existence of such mechanisms enhances the sense of security and ethical responsibility within the organization. ALUMIL also implements preventive training programs on transparency, addressed to all levels of management, covering topics such as:

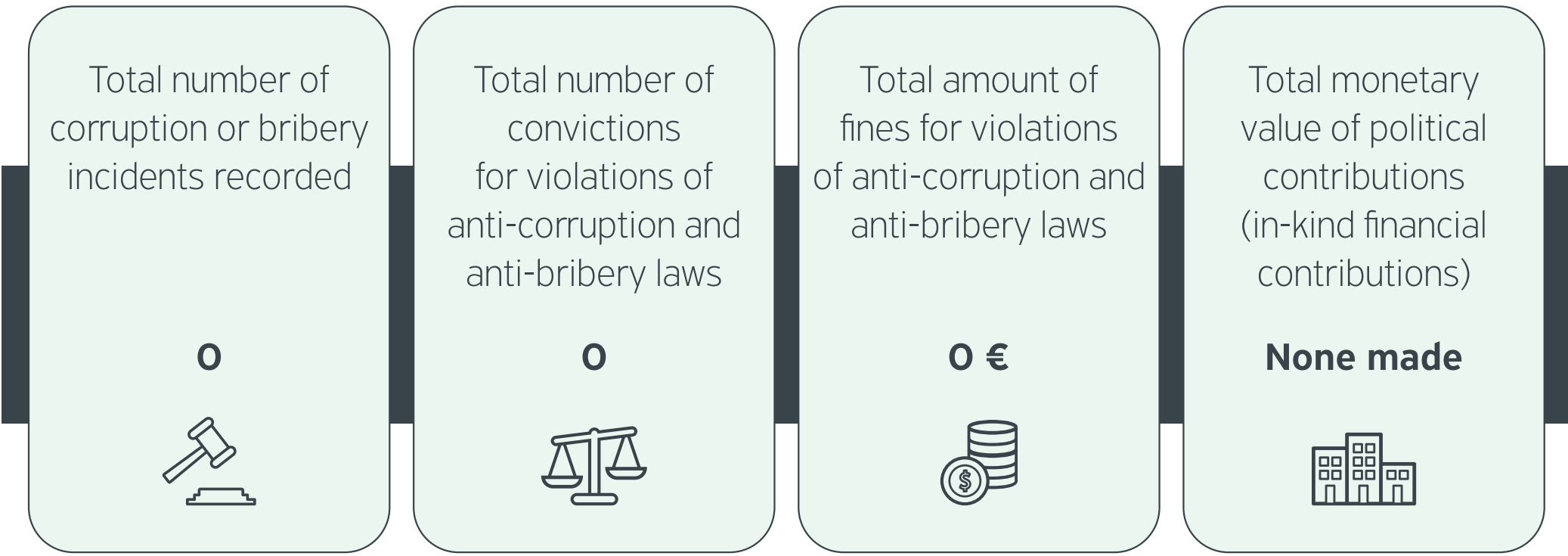
- ◆ Identifying and preventing corruption risks
- ◆ Handling complaints
- ◆ Consequences of non-compliance
- ◆ Best ethical practices in business relationships

Particular emphasis is placed on transparency practices within the supply chain. The Group evaluates its suppliers not only based on quality and cost, but also on social and environmental criteria.

It maintains fair payment practices, prioritizing the stability of its small and medium-sized partners.

The anti-corruption framework is continuously monitored and improved where necessary, through new mechanisms or revisions to existing policies.

In cases where gaps are identified, the Group is committed to drafting and implementing a new action plan, ensuring compliance with European standards. The Group’s commitment to principles of ethics and transparency is an integral part of its corporate identity and a key pillar for maintaining the trust of its shareholders, employees, customers and the local communities in which it operates.



For the ESRS indicators, please refer to the Group’s 2024 Annual Financial Report.

Alignment Indicators with the ESG Reporting Guide of the Athens Stock Exchange

ID	Indicator	Value	Unit of Measurement	Group / Parent Company
A-E3-1	Waste management – Total quantity of hazardous waste	538.04	tons	Parent Company
A-E3-2	Waste management – Total quantity of non-hazardous waste	20,696.64	tons	Parent Company
A-E3-3	Waste management - Percentage of waste by type of treatment - Recycled	100	%	Parent Company
A-E3-4	Waste management - Percentage of waste by type of treatment - Composted	0	%	Parent Company
A-E3-5	Waste management - Percentage of waste by type of treatment - Incinerated	0	%	Parent Company
A-E3-6	Waste management - Percentage of waste by type of treatment - Landfilled	0	%	Parent Company
A-E3-7	Waste management - Total ammount of radioactive waste	0	tons	Parent Company
A-E4-1	Total amount of effluent discharge containing polluting substances	0	m³	Parent Company
A-E5-1	Biodiversity sensitive areas - Description of the impact of business operations on biodiversity sensitive areas	The plant is located in the Kilkis Industrial Area (VI.PE), which was developed in a region not classified as biodiversity-sensitive	-	Parent Company
A-E7-1	Removals and carbon credits - GHG removals and storage	0	tn CO2 eq	Group
C-S4-1	Employee turnover - Percentage of full-time employee voluntary turnover	8.50	%	Group
C-S4-2	Employee turnover - Percentage of full-time employee involuntary turnover	3.30	%	Group
C-S4-3	Employee turnover - Total employee turnover	12.70	%	Group
C-S5-1	Employee training - Average training hours of employees at top management level	35.20	Hours	Group

ID	Indicator	Value	Unit of Measurement	Group / Parent Company
C-S5-2	Employee training - Average training hours of the rest employee categories	13.91	Hours	Group
C-S5-3	Employee training - Average training hours - Women	16.00	Hours	Group
C-S5-4	Employee training - Average training hours - Men	13.40	Hours	Group
A-S2-1	Total amount of monetary expenditure on employee training	178,073	€	Group
SS-S1-2	Product quality and safety - Total number of product recalls issued	0.00	-	Group
SS-S6-3	Health and safety performance - Accident frequency rate	2.21	-	Parent Company
SS-S6-4	Health and safety performance - Accident severity rate	10.25	-	Parent Company
C-G1-7	Board Composition – Average age of Board members	61	Years	Group
C-G1-8	Board Composition – Average tenure of Board members	19	Years	Group
A-G1-2	Strategy, business model and value chain - Activity in fossil fuel sector, chemical production, controversial weapons, cultivation and production of tobacco	No such activity	-	Group
A-G6-1	ESG Bonds	0	€	Group



Sustainability Statement

2024 Summary