

## Sustainability Policy

**ElvalHalcor** has incorporated the principles of Sustainability in its business operations, thus recognizing that its long-term growth can only be achieved through Sustainable Development. Concern for employee health and safety, respect and protection of the environment, comprehensive coverage of customer needs and harmonious coexistence with the local communities in which it operates are the main issues of Sustainability of ElvalHalcor.

Sustainability Policy of ElvalHalcor is in accordance with the Company's values of responsibility, integrity, transparency, effectiveness and innovation and is determined by the Top Management, which is committed to the:

- implementation of the Sustainability Policy at all levels and in all the Company's operating entities.
- strict compliance with the legislation in force and full implementation of standards, policies, internal guidelines and procedures applied by the Company as well as other commitments, arising from voluntary agreements, countersigned and accepted by ElvalHalcor.
- two-way and open communication with all stakeholders in order to identify and record their needs and expectations.
- provision of a safe and healthy working environment for our people, partners and any third party involved.
- protection of human rights and provision of a work environment of equal opportunities, free from any discrimination.
- continuing efforts to reduce the environmental footprint, though implementing responsible actions and preventive measures in accordance with Best Available Techniques,
- cooperation and support of local society aiming to contribute to the sustainable development of the local communities in which we operate.
- continual pursuit of creating added value for the stakeholders.

In order to realize the aforementioned commitments, ElvalHalcor voluntarily and responsibly has been planning and implementing the relative programs, while, at the same time, setting strategic priorities, which focus on the following areas of Sustainability of the Company:

- 1. Economic Growth and Corporate Governance** : The Company aims to achieve positive financial results, implements a system of sound Corporate Governance, assesses and manages business risks in order to safeguard the interests of the stakeholders. It develops procedures and takes measures both to enhance transparency and integrity and to prevent and combat corruption.
  
- 2. Marketplace** : The Company focuses on achieving best and complete customer satisfaction and invests in research and development in order to provide new products and solutions of high quality and added value, thereby improving its position in an ever-evolving business environment. Additionally, the Company expects responsible business conduct by its suppliers and partners.
  
- 3. Human Resources – Occupational Health and Safety** : The Company respects and supports internationally - recognized human rights and implements fair reward, meritocracy and equal opportunities in respect of all its employees, free from any discrimination and with respect to its personnel diversity. It also provides opportunities for human resources development through ongoing training and continuous appraisal.  
A healthy and safe working environment is a matter of primary importance to the Company.
  
- 4. Environment** : Concerning environmental management, ElvalHalcor applies the principle of prevention and takes systematic steps to minimize its environmental footprint. The Company follows the principles of Circular Economy ensuring the optimal management of natural resources, the promotion of metal recycling and the utilization of secondary materials as well as giving priority to waste management based on the degree of the “circularity” of the treatment method.
  
- 5. Local Community** : The Company stands by the side of its local community and responds with sensitivity to matters of its concern building up a close relationship based on dialogue and cooperation. The Company designs and implements actions to meet the fundamental needs of society in terms of employment, development, education, health, environment and culture. It encourages volunteerism and supports initiatives, in order to develop the local community.

In respect of all the above key issues concerning ElvalHalcor and its subsidiaries, we set targets of Sustainability, which are annually assessed for their effectiveness and revised when deemed necessary.

The relevant policy, the results of ElvalHalcor's performance as regards Sustainability issues, as well as the implementation of programs and achieving the objectives set, are monitored by the Company's Sustainability team and are disclosed, on an annual basis, in order to keep all stakeholders informed.

The opinions and view of the stakeholders are taken into account under an annually-held Management Review of all the above issues.