

## **SPECIAL ANNUAL REPORT PURSUANT TO ARTICLE 3C OF LAW 4706/2020**

### **1. Introduction**

This special annual report of the société anonyme under the name “ELVALHALCOR HELLENIC COPPER AND ALUMINIUM INDUSTRY S.A.” with G.C.R. Nr. 303401000 and T.I.N. 094061318 (hereinafter the “**Company**”), of 2025, is prepared in accordance with the provisions of article 3C of Law 4706/2020 (as added by article 7 of Law 5178/2025), taking into account the letter with protocol number 12678/08.09.2025 of the General Secretariat for Equality and Human Rights of the Ministry of Social Cohesion and Family, given that the Company, based on its financial statements of the financial year 2024, exceeds the quantitative thresholds of the criteria (number of employees, annual turnover / annual balance sheet total) set out in paragraph 3 of article 3A of Law 4706/2020 (as added by article 5 of Law 5178/2025), as specifically set forth below under 2 c).

The composition of the current Board of Directors of the Company (elected by the Ordinary General Meeting of the Company’s shareholders on 22.05.2025 and constituted into a body pursuant to the decision of the Board of Directors of 22.05.2025) is as follows:

- 1) **Michail Stassinopoulos** of Nikolaos, T.I.N. 037173270, **Chairman of the Board – Non-Executive Member**,
- 2) **Konstantinos Katsaros** of Georgios, T.I.N. 013430584, **Vice-Chairman of the Board – Executive Member**,
- 3) **Nikolaos Carabateas** of Efstratios, T.I.N. 076145475, **Executive Member**,
- 4) **Panagiotis Lolos** of Charalambos, T.I.N. 047852654, **Executive Member**,
- 5) **Dimitrios Kyriakopoulos** of Georgios, T.I.N. 007070674, **Non-Executive Member**,
- 6) **Elias Stassinopoulos** of Nikolaos, T.I.N. 027228448, **Non-Executive Member**,
- 7) **Aikaterini Nafsika Kantzia** of Adamantios, T.I.N. 040315145, **Non-Executive Member**,
- 8) **Athanasia Kleniati-Papaioannou** of Konstantinos, T.I.N. 053911190, **Non-Executive Member**,
- 9) **Vasileios Loumiotis** of Ioannis, T.I.N. 020214816, Senior **Independent Non-Executive Member**,
- 10) **Ploutarchos Sakellaris** of Konstantinos, T.I.N. 114472620, **Independent Non-Executive Member**,
- 11) **Ourania Aikaterinari** of Nikolaos Parmenion, T.I.N. 052593197, **Independent Non-Executive Member**,
- 12) **Georgios Lakkotrypis** of Antonios, T.I.N. 111370161, **Independent Non-Executive Member**.

The above twelve-member Board of Directors of the Company consists of:

- i) three (3) executive members and nine (9) non-executive members, of which four (4) are independent non-executive members, and
- ii) nine (9) men and three (3) women.

## **2. Information pursuant to paragraph 1 of article 3C of Law 4706/2020**

- a) Information on the application of the percentages of paragraph 3 of article 3A of Law 4706/2020 (as added by article 5 of Law 5178/2025), with reference to the number of executive and non-executive members of the Board of Directors who are persons of the underrepresented gender (article 3C par. 1(a) of Law 4706/2020, as added by article 7 of Law 5178/2025).**

The aforementioned three (3) members of the Company's Board of Directors who are women are all non-executive members, one (1) of whom is an independent non-executive member.

The participation of the underrepresented – female – gender (with three members) in the twelve-member Board of Directors of the Company amounts to 25%. This percentage meets the requirements of paragraph 2 of article 3A of Law 4706/2020 and article 17 par. 2(b) of Law 5178/2025 [percentage of twenty-five percent (25%) of the total members of the Board of Directors] as of the date of this report, since the provision of paragraph 3 of article 3A of Law 4706/2020, which stipulates a corresponding percentage of 33%, enters into force on 30.06.2026, pursuant to article 42 par. 2 of Law 5178/2025.

- b) Information on compliance with the obligation of paragraph 4 of article 3A of Law 4706/2020 (as added by article 5 of Law 5178/2025), where applicable (article 3C par. 1(b) of Law 4706/2020, as added by article 7 of Law 5178/2025).**

At present, among the three (3) female members of the Board of Directors, no executive member is included.

It should be noted that the provision of paragraph 4 of article 3A of Law 4706/2020, which stipulates that in the Board of Directors of a company falling within the scope of paragraph 3 of article 3A of Law 4706/2020, where three (3) or more executive members participate, at least one (1) executive member must be of the underrepresented gender, has not yet entered into force as of the date of this report, but will enter into force on 30.06.2026, pursuant to article 42 par. 2 of Law 5178/2025. The Company will take the necessary actions to comply with the above obligation within the statutory deadline (article 17 par. 3 of Law 5178/2025), provided that the Board of Directors continues to include three (3) or more executive members.

## **c) Summary table showing gender representation on the Board of Directors**

In summary, the above points 1 and 2 a) and b), as well as all other points provided for in the with protocol number 12678/08.09.2025 of the General Secretariat for Equality and Human Rights of the Ministry of Social Cohesion and Family (under Part A and Part B, pages 2 – 3) as necessary content of this report, are included in the following table (based on the template of the relevant draft table mentioned and attached to the above letter):

PART A: Company Data				
Business name:		ELVALHALCOR HELLENIC COPPER AND ALUMINIUM INDUSTRY S.A.		
G.C.R. number:		303401000		
T.I.N:		094061318		
Company business sector:		Basic Resources – Metal Fabricating Industry		
Number of Company employees, at individual level:		1.883		
Annual turnover:		€ 2.375.920.000		
Annual balance sheet of the Company:		€ 2.445.906.000		
PART B: Gender representation on the Board of Directors data				
	Total Members	Male members	Female members	Percentage of members of the underrepresented gender
Members	12	9	3	25,00%
Executive members	3	3	0	0,00%
Non-executive members	9	6	3	33,33%
Independent non-executive members	4	3	1	25,00%
Reference of recent Minutes of the formation of the Board of Directors into body:		BoD Minutes of 22.05.2025		

**d) Measures applied or to be adopted for improving gender-balanced representation on the Board of Directors (article 3C par. 1(c) of Law 4706/2020, as added by article 7 of Law 5178/2025).**

The Company recognizes the importance of diversity, equality, and strengthening the participation of both genders in decision-making bodies, and has adopted and implements the following measures to maintain and further enhance gender-balanced representation on its Board of Directors, which is a strategic priority for the Company:

The Company adopts and applies objective selection criteria and impartial and transparent procedures, aiming to embed the principle of gender equality into its corporate culture.

**i) Selection Criteria:**

- Objectivity: Selection of members of the Board (as well as senior executives) is based on measurable and objective criteria, such as professional skills, experience, integrity, and specialized knowledge, regardless of gender or other personal characteristics.
- Equal qualifications: When two or more candidates have equivalent qualifications and experience, preference is given to a candidate of the underrepresented gender, thus contributing to balancing the composition of the Board.
- Objective evaluation: Final selection must ensure that candidates fully meet the requirements of the position, even when the principle of preference for the underrepresented gender is applied, so that unsuitable persons are not appointed.
- Prevention of discrimination: Evaluation and selection procedures are designed and implemented in a way that prevents any direct or indirect gender discrimination.

**ii) Selection Procedures:**

- Transparency: Selection procedures for Board members are transparent and documented, with predefined criteria communicated to the competent bodies.
- Accountability: The Company ensures proper documentation and sufficient justification of selection decisions, enhancing accountability and stakeholder trust.
- Monitoring and control: The process is systematically monitored to identify deviations or patterns indicating discrimination, allowing corrective measures to be taken.
- Training: Training of executives and Board members on gender equality, non-discrimination, and fair selection strengthens the effectiveness of the practice and contributes to mindset change, avoiding unconscious bias, and promoting balanced representation.
- Integration into corporate governance: The promotion of gender-balanced representation is not an isolated action but is integrated into governance policies, strategy, and internal procedures of the Company, such as the Suitability Policy and the Diversity Policy.

For even greater integration of the above principles into relevant policies, practices, and procedures, and into the Company's strategy and culture, as well as for further improvement of gender-balanced representation on the Board of Directors – which, apart from a legal obligation, also constitutes an indicator of sound corporate governance – the Company intends to adopt the following measures:

- Further strengthening the implementation of transparent, clear, merit-based, unambiguous, and gender-neutral criteria throughout the selection process.
- In case of candidates of different genders with equal qualifications, giving priority to the candidate of the underrepresented gender.
- Upon request by candidates considered for appointment or election to the Board, providing them with (a) the evaluation criteria, (b) their objective comparative

assessment based on those criteria, and (c) if applicable, the specific reasons that led to the exceptional selection of a candidate of the non-underrepresented gender.

- When cooperating with specialized recruitment consultants, instructing them to propose balanced candidate lists, including suitable people of both genders.
- Strengthening the promotion of women to positions of responsibility within the management hierarchy, aiming to expand the pool of future Board candidates.
- Organizing awareness-raising actions on the value of diversity and gender-balanced representation in governance bodies.
- Providing training for members of the Remuneration and Nomination Committee and Board members on diversity and inclusion issues.
- Annually recording and assessing the percentage representation of genders on the Board and in other managerial positions.
- Explicitly incorporating the implementation of the above measures into the Company's existing relevant policies (e.g., Suitability Policy, Diversity Policy) following their update.

In accordance with article 3C par. 2 of Law 4706/2020 (as added by article 7 of Law 5178/2025), the present report is published on the Company's website and sent to: (a) the Hellenic Capital Market Commission, (b) the Documentation, Research and Digital Support Department (Gender Equality Observatory) of the General Secretariat for Equality and Human Rights of the Ministry of Social Cohesion and Family, and (c) the Greek Ombudsman.

Athens, September 10<sup>th</sup>, 2025

The Board of Directors of the Company