

Sustainable actions with measurable impact



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About the Report

[GRI: 2-3, 2-4, 2-5, 2-6, ATHEX ESG: A-G5, C-G7, C-G8]

This Group Report, was issued in July 2024 and pertains to the period from January 1, 2023, to December 31, 2023, and was prepared by the Sustainable Development Department.

It has been compiled in accordance with the GRI standards. For reasons of consistency and completeness of the provided information, as well as comparability of the data, the corresponding data for the previous two years are also presented. At the same time, other valid standards, tools, and recommendations from internationally recognized initiatives have been taken into account to ensure compliance with the most comprehensive framework possible, such as the SASB standards for the chemical sector, the recommendations of the international TCFD initiative, CDP and EcoVadis evaluations, the ESG Information Disclosure Guide of the Athens Stock Exchange, where the Group participates in the ATHEX ESG index, as well as the impact on the UN Sustainable Development Goals (SDGs).

For clarifications regarding the terminologies included in this report, an Abbreviation Index is provided. Any discrepancy at the last digit level of the quantitative information in this Report is due to rounding of amounts. Minor differences that may have occurred in previous years are due to the detailed recalculation of data and conversion factors.

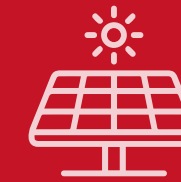
Corresponding information has also been included and extensively analyzed in the Annual Financial Report, **Section 12: Non-Financial Information Report.**

Business Model



We believe in our ability as a Group to inspire change and drive innovation, creating a value system that addresses the need for a transition to a more sustainable world.

Our performance in 2023



10.8 MW

Capacity of photovoltaic systems



7.8%

Use of energy from renewable sources



22.3%

Increase in the use of energy from renewable sources*



12.9 thousand tons

Use of recycled raw materials



-12.6%

Reduction of total waste*



-21.7%

Reduction of solid waste sent to landfill*



-12.8%

Reduction in the number of recorded injuries*

*compared to 2022

Message from the Chairman

Despite the objective difficulties of a constantly changing environment, the Group has continued its dynamic course of sustainable development, with an enhanced international footprint and long-term significant value creation for all its stakeholders. This is the result of a well-thought-out strategy, based on significant investments, innovative circular economy models, and strategic partnerships. Characteristics such as rapid reflexes, high expertise, innovation, and foresight have established us as a reference point in the international markets for packaging solutions and technical fabrics, as well as a key supporter of the Greek economy and society. The Group has practically demonstrated its desire and ability to contribute to the achievement of the green transition while remaining flexible, resilient, and effective in the face of any challenges.

Konstantinos Halioris

Message from the CEO

At Thrace Group, we are driven by a constant focus on innovation and the creation of both direct and indirect value for society and the environment. In this context, we evolve, innovate, and effectively adapt to the imperative call of modern times for sustainable development. At the core of our business model are the provision of innovative and sustainable products and solutions, as well as a pioneering, effective, and collaborative circular economy framework. This ensures that our business growth is highly beneficial. We will continue with the same dedication, determination, and speed to grow and create significant and long-term value across our entire ecosystem, including our employees, customers, suppliers, and partners, the investment and consumer community, and the broader society.

Dimitris Malamos

Our priorities for 2024/2025



Climate Change

Reduction of energy consumption and optimization of renewable energy use



Circular Economy

Optimization of solid waste management and use of recycled raw materials



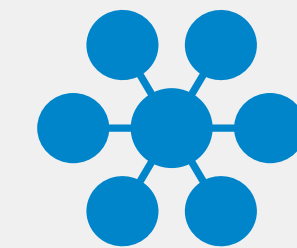
Biodiversity

Optimization of pellet/microplastic management (zero pellet loss)



Health & Safety

Ongoing corrective actions as measures to reduce accidents



Training

Strengthening of the training plan

Our 2025 targets

[ATHEX ESG: A-G3]

40% Reduction of solid waste to landfill compared to 2021

30% Increase in the use of recycled raw materials compared to 2021

10% Energy consumption from renewable sources with self-generation according to current productivity levels

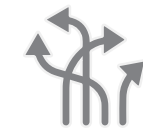


Vision

[ATHEX ESG: A-G1]

To be the most valuable partner for our customers and suppliers and to consistently increase shareholders' value while ensuring a prosperous future for all individuals working in Thrace Group.

Our values



Flexibility



Responsiveness



Integrity



Innovation



Collaboration



Effectiveness



Leadership

Thrace Group at a glance

[GRI: 2-6, 2-7, ATHEX ESG: A-G1]



14

companies worldwide engaged in active operations



3

sectors: technical textiles, packaging solutions, hydroponic greenhouses



25

market segments with products and solutions



2,089

employees, including joint ventures



80

countries sales network



28

technologies in production processes



9

countries with production, marketing, and distribution companies



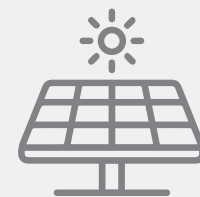
345.4

group's net sales (millions €)



120

product groups that support circular economy principles



10.8

MW photovoltaic net metering systems



110,000

MT of raw materials from polypropylene and polyethylene, processed



8,500

MT of primary raw materials to be replaced with recyclable plastic by 2025



12,976

MT of recycled material from production residues and external sources, utilized

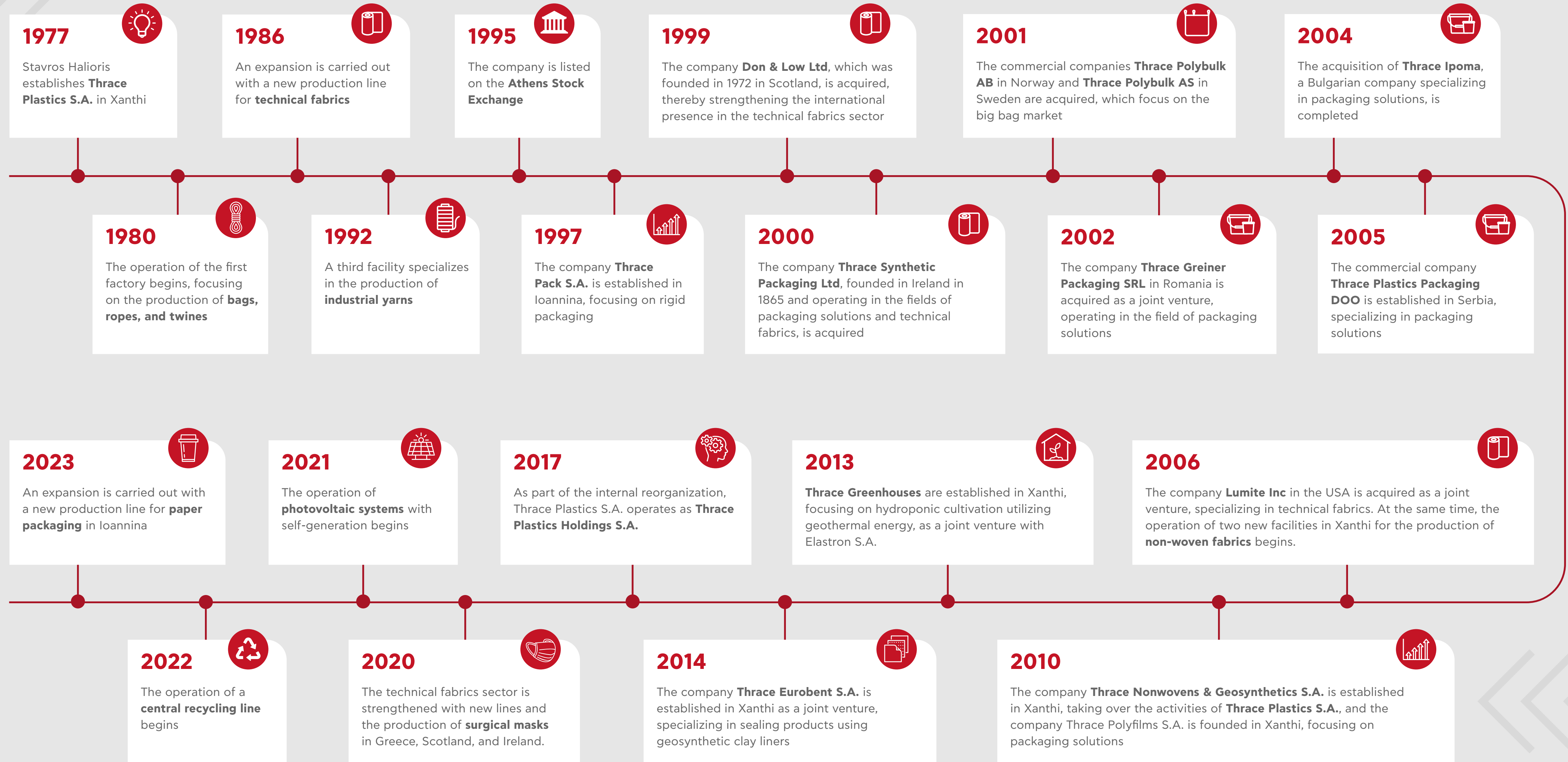


410,131

social support expenses through the Stavros Haliouris Social Centre (in €)



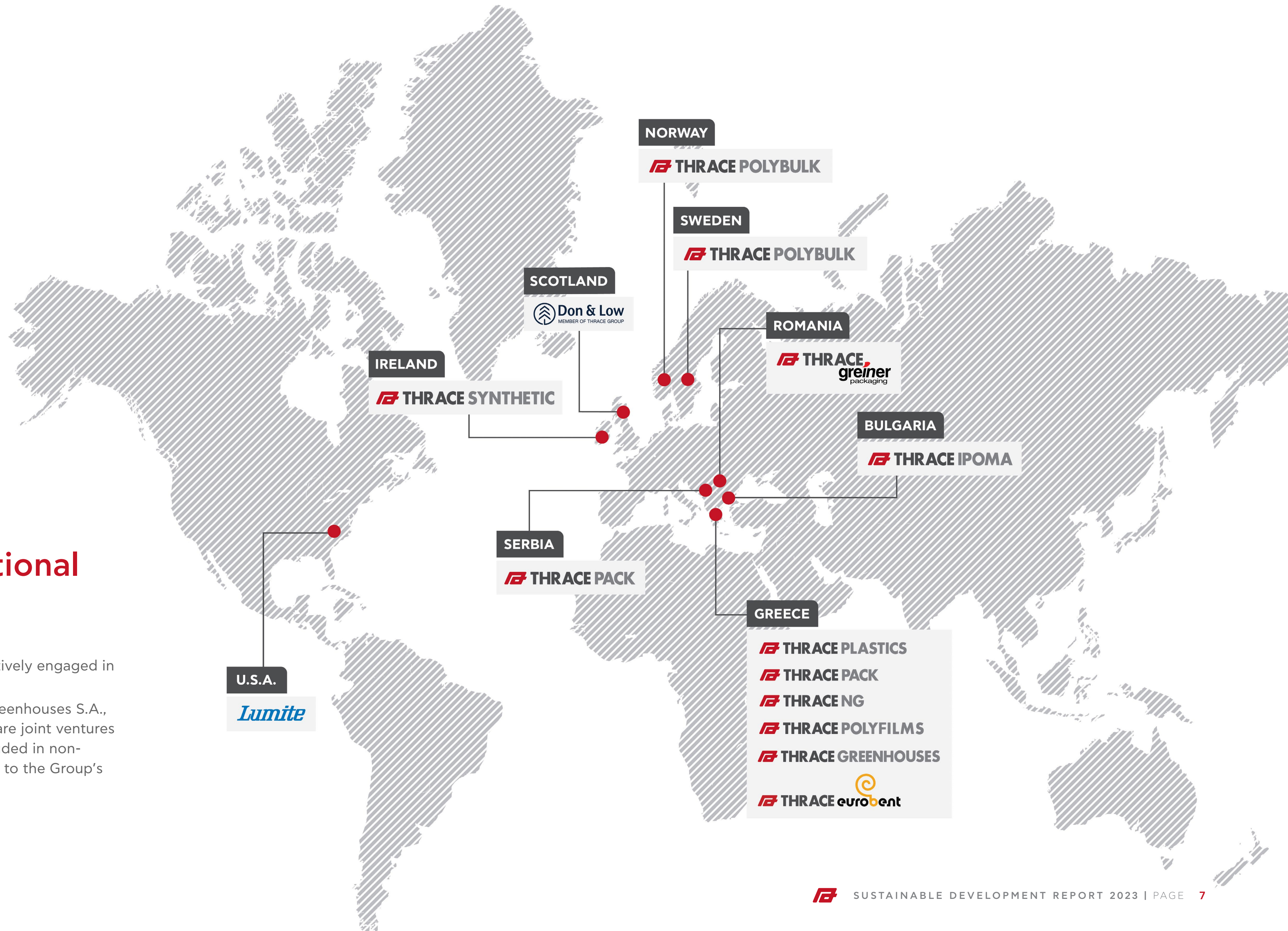
History



Domestic and international presence

[GRI: 2-1, 2-2, ATHEX ESG: A-G1]

- The Group consists of 14 companies that are actively engaged in commercial and/or production activities.
- The companies Thrace Eurobent S.A., Thrace Greenhouses S.A., Thrace Greiner Packaging SRL, and Lumite Inc. are joint ventures of the Group. However, their overall data is included in non-financial performance indicators, as they adhere to the Group's common sustainable development principles.




Business sectors of activity

Technical Fabrics Sector

[GRI: 2-6, ATHEX ESG: A-G1]

- Production and trade of synthetic fabrics for industrial and technical uses.
- Broad and diversified product portfolio.
- Europe-based production with a global footprint.
- Extensive sales network, mainly in Europe and America.

Product Families


 Geotextiles (woven, nonwoven)

 Fabrics


 Nets

 Yarns

 Geogrids

 Membranes

 Strapes

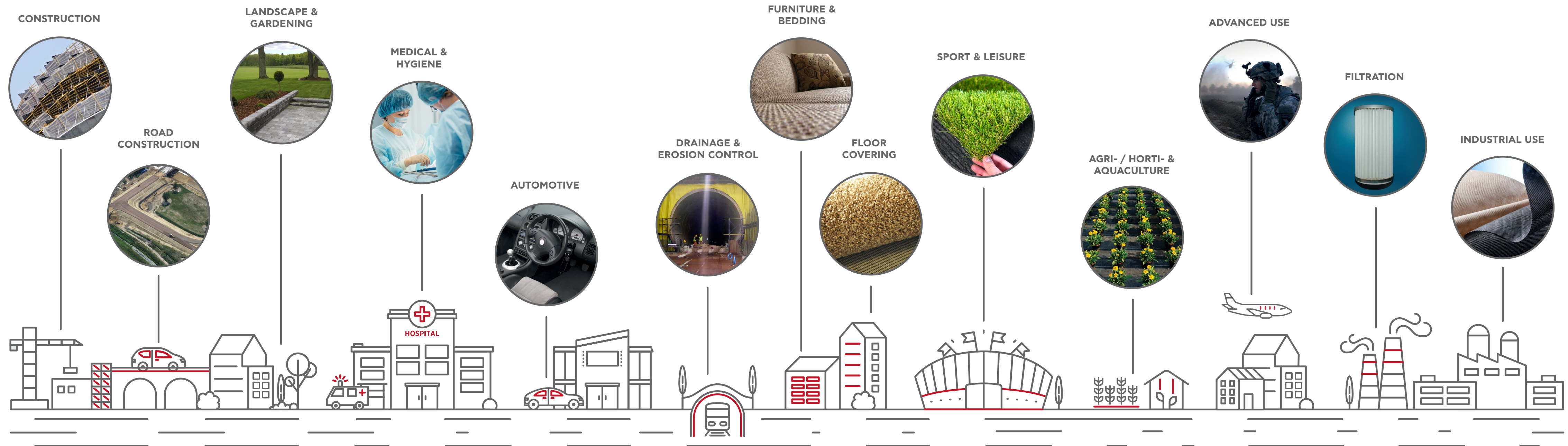
 Fibres

 Geocomposites

 Film

 Ropes

Applications



GREECE



SCOTLAND



IRELAND



NORWAY & SWEDEN



USA

Business sectors of activity

Packaging Sector

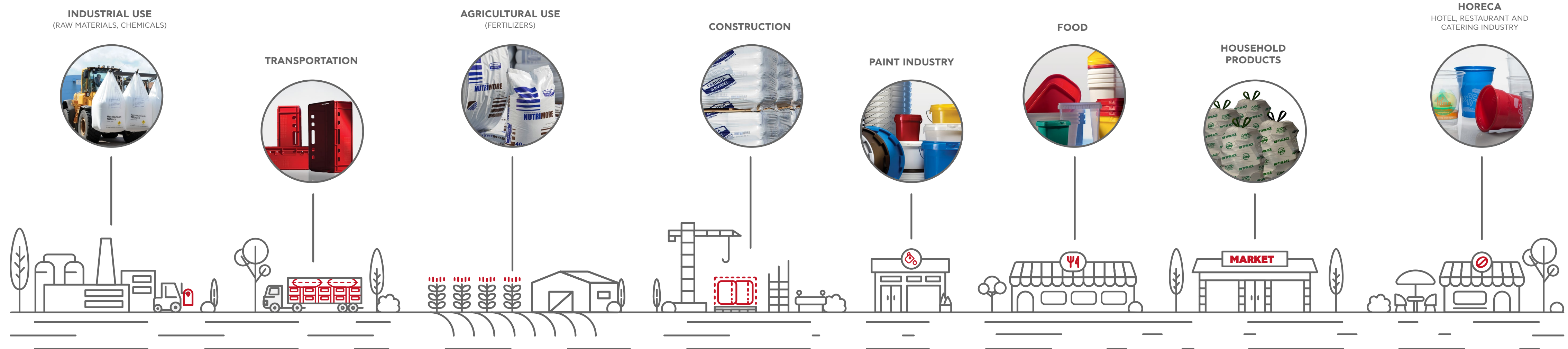
[GRI: 2-6, ATHEX ESG: A-G1]

- Production and trade of food and industrial product packaging.
- Pioneer in the Northern European market.
- Europe-based production.
- Extensive sales network with continuous volume growth on an annual basis.

Product Families

 FIBC / filling solutions	 Container liners / cargo protection	 Thermoforming cups	 Garbage bags
 Bags / FFS film	 Packaging fabrics	 Crates	 Twines
 Packaging / pallet covering film	 Buckets / pails / containers	 Bag in box	

Applications



THRACE PACK

GREECE & SERBIA

THRACE POLYFILMS

GREECE

THRACE IPOMA

BULGARIA

THRACE greiner packaging

ROMANIA

THRACE SYNTHETIC

IRELAND

Business sectors of activity

Agricultural Sector

[GRI: 2-6, ATHEX ESG: A-G1]

- The largest hydroponic greenhouses in Northern Europe.
- The only greenhouses in the world heated exclusively by geothermal energy.
- Greek vegetables with almost zero CO₂ footprint.
- Cultivation based on the highest standards.

Product Families



Cluster Tomato



Beef Tomato



Eggplant



Mini Cucumber 600gr



Mini Cucumber



Cucumber

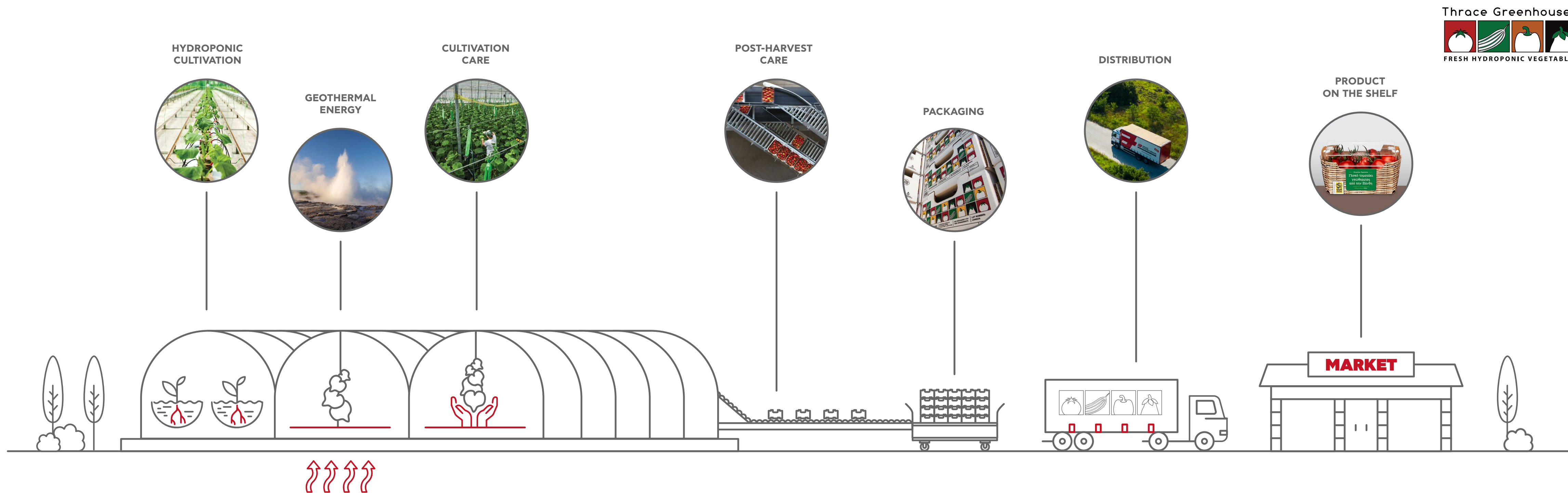


Mini Tomato 500gr



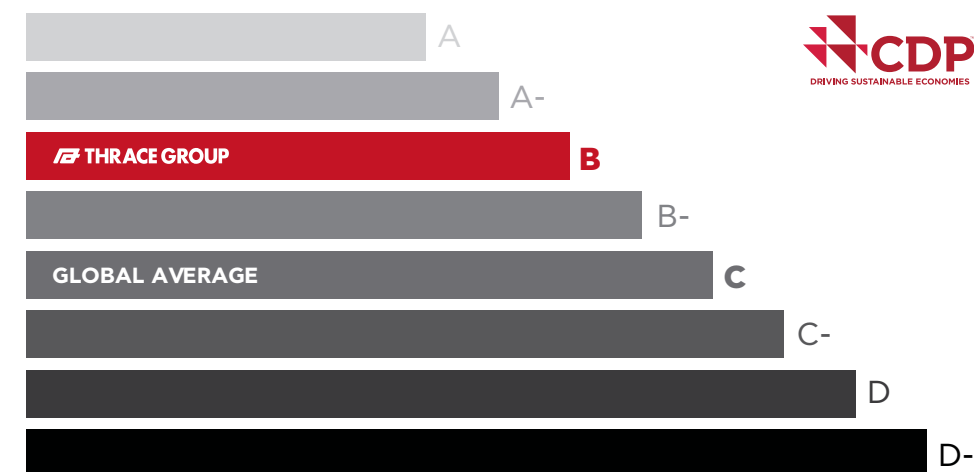
Mini Cucumber 750gr

Practices



Distinctions and evaluations

Participation in the international organization CDP, which evaluates organizations on their environmental impacts, environmental risk management, and demonstration of best practices. In 2023, the Group solidified its position by receiving a 'B' rating for its performance on climate change, confirming that it is on par with the industry average while surpassing the global average.



Participation in the international initiative SBTi (Science Based Targets Initiative), which validates emission reduction targets based on the most credible scientific data on climate change. The Group is committed to establishing and validating scientific targets for reducing its carbon footprint and has already started this process.

Participation in the European organization EcoVadis, which assesses organizations based on their business practices and commitment to sustainable development. In 2023, the Group received 5 silver awards through the companies Pack, Nonwovens & Geosynthetics, Polyfilms, Greiner, and Ipoma.

Ranked in the highest tier (Platinum) in the Forbes ESG Transparency Index, which reflects the level of transparency on ESG issues among the 100 largest companies in Greece.

Participations in initiatives

[GRI: 2-28]

	Global association of nonwovens and related industries (EDANA)
	Polyolefin Circular Economy Platform (PCEP) organization
	Circular Plastics Alliance (CPA) initiative
	Non-profit trade association Synthetic Turf Council (STC)
	European Man-Made Fibres Association (CIRFS)
	European Association of Geosynthetic Manufacturers (EAGM)
	Association of Plastics Industries of Greece (SVPE)
	Association of the Greek Manufacturers of Packaging and Materials (AGMPM)
	Federation of Industries and Enterprises (SEV)

Certifications

ISO 14001:2015	Environmental Management
ISO 45001:2018	Health and Safety Management
ISO 50001:2018	Energy Management
ISO 9001:2015	Quality Management
ISO 13485:2016	Quality Management for Medical Devices
ISO 22000:2018	Food Safety
ISCC PLUS	Certification of Sustainable Sourcing of Raw Materials
BRC, IFS, FDA, HALAL	Food Safety and Quality
Global GAP	Implementation of Good Agricultural Practices
EuCertPlass	Recycling of Secondary Raw Materials
Recyclass	Content of Recycled Material
OK Recycled	Calculation of Recycled Content
CoVid Shield	Health and Safety
Oeko-Tex® Standard 100	Content of Harmful Substances

Approach to Sustainable Development

For us, sustainable development is achieved through **measurable results** and implemented via innovative practices. By focusing on all the goals of sustainable development, we delve into those where we have the greatest impact and promote collaboration with our partners as the most effective way to achieve them.

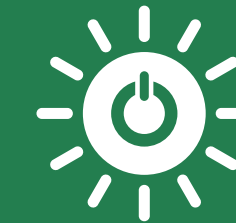


The Group focuses on the following Sustainable Development Goals

3 GOOD HEALTH AND WELL-BEING



7 AFFORDABLE AND CLEAN ENERGY



8 DECENT WORK AND ECONOMIC GROWTH



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



The adoption of sustainable practices is a key pillar of our strategy

Thrace Group, responding to modern challenges, remains committed to its enduring dedication to ESG goals and the meaningful contribution of its business activities to a sustainable future. This commitment is upheld by the Sustainable Development Department along with all the Group’s executives, aiming for continuous improvement in each of these areas.

Ioannis Sideris
Chief Sustainability Officer

Ioannis Nathnanail
Sustainability Manager

Framework

At the heart of all the Group’s business practices is the creation of value for society and the environment, as well as the operation within a strong framework of corporate governance.



The Group consistently aligns with the leading sustainable development initiatives

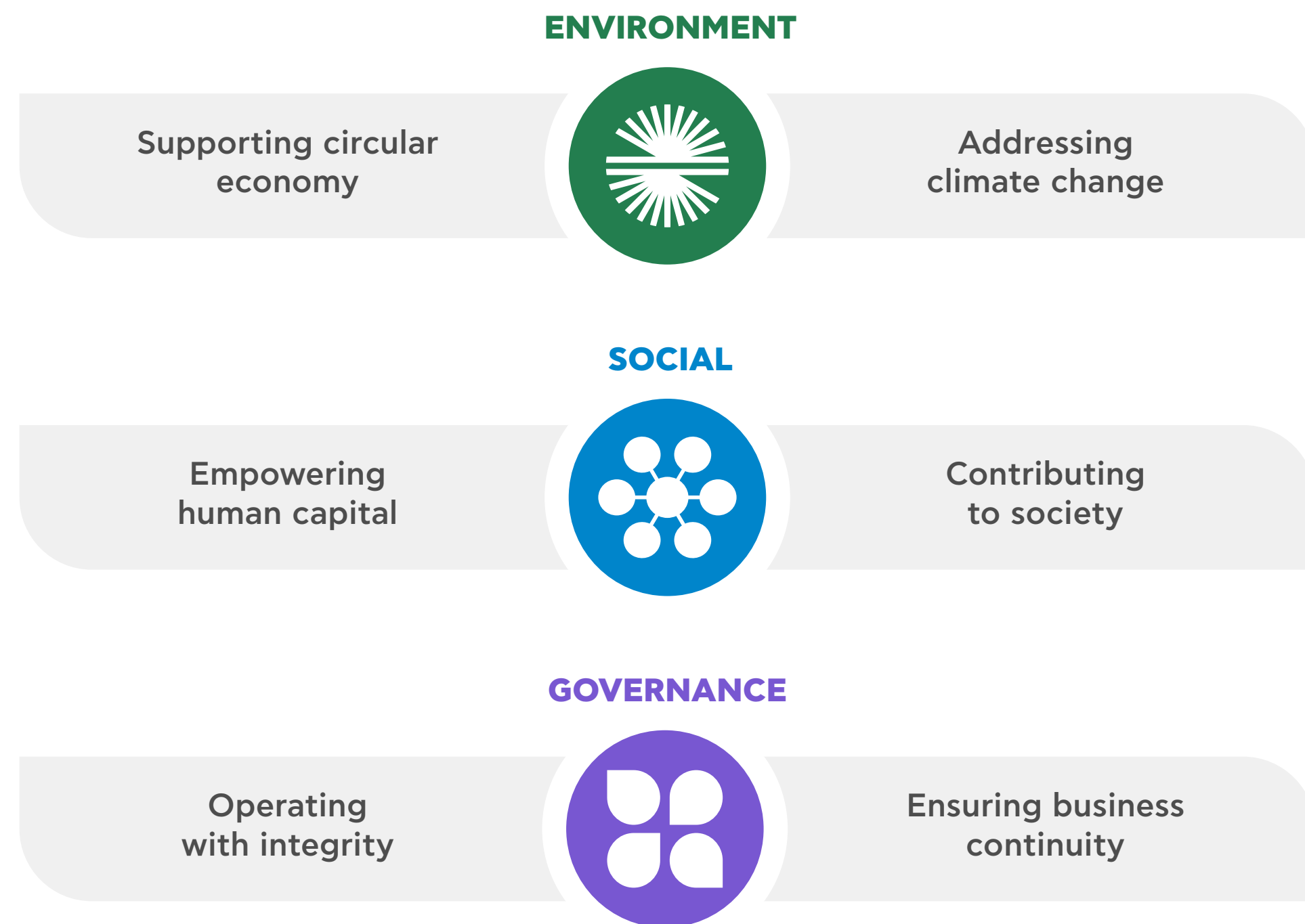
2018	Disclosure of the approach and annual performance based on GRI standards	
2019	Networking through the circular economy platform In the Loop with the goal of reducing the environmental footprint	
2020	Evaluation of business practices and commitment to sustainable development	
2021	Evaluation and disclosure of the environmental performance of product groups	
2021	Assessment of environmental impacts, risk management, and demonstration of best practices	
2021	Participation in the ATHEX ESG Index of the Athens Stock Exchange and disclosure according to the relevant standards	
2021	Disclosure of the approach and annual performance based on SASB standards	
2022	Certification of the recycled content of specific products by evaluating its traceability	
2022	Measurement, disclosure, and reduction actions for carbon emissions indicators (scope 1, 2, 3)	
2023	Classification of economic activities as environmentally sustainable based on technical criteria	
2024	Validation of carbon reduction targets to address climate change	
2025	Disclosure of the approach and annual performance based on the ESRS criteria of the CSRD directive	

Policy

[GRI: 2-23, ATHEX ESG: C-G4]

At the core of the Sustainable Development Policy is the Group’s commitment to grow with respect for society and the environment, creating solutions for a sustainable future, thus remaining a reliable social partner. Its approach to sustainable development is based on six principles:

Principles



Strategy

[GRI: 2-22, SASB: RT-CH-110a.2, ATHEX ESG: SS-E1]

The Sustainable Development Department has developed the 2022-2026 Strategic Plan for Sustainable Development, which has been approved by the Sustainability Committee and the Group’s Board of Directors. The Strategic Plan is based on the following strategic pillars, in line with the relevant Policy, each of which is detailed with specific actions, initiatives, and goals.



Supervision

[GRI: 2-13, 2-14, ATHEX ESG: C-G2]

According to the Internal Rules of Operation, the supervision of the implementation of the Sustainable Development Policy is the responsibility of the Sustainability Committee (Environment-Society) and the Audit Committee (Corporate Governance) at the Board of Directors level, as well as the Sustainable Development Department at the administrative level.

Risk management

[GRI: 2-25, ATHEX ESG: SS-G3]

The Group has adopted a Risk Management Framework designed to effectively manage risks, integrating the Risk Management Policy and Procedures.

Stakeholder engagement

[GRI: 2-6, 2-29, ATHEX ESG: C-S1]

The Group has implemented a Corporate Communication Policy and actively engages with stakeholder groups affected by its activities, as well as those that influence its strategy, thereby enhancing its operational effectiveness.

Materiality analysis

[GRI: 3 1, 3-1, 3-2, ATHEX ESG: C-G3]

At the end of 2022, the Group redefined significant issues related to creating economic, social, and environmental benefits across the entire value chain and prioritized them in relation to its business model based on the methodology of the internationally recognized GRI reporting standards. For data comparability, the Group utilizes the results of the materiality analysis for two consecutive annual reports.

Steps	Implementation Coordinator
1 st : Understanding and updating the business model of the Group	Sustainable Development Department
2 nd : Identifying significant topics	Sustainable Development Department
3 rd : Validating significant topics	Sustainability Committee, Audit Committee
4 th : Prioritizing & validating of material topics	Sustainable Development Department, Sustainability Committee, Audit Committee

The prioritization was carried out through consultations with representatives from key stakeholder groups, including Shareholders & the Investment Community, the Board of Directors, Management, Employees, Suppliers, Customers, Government, Non-Governmental Organizations & Civil Society, and Business Associations.

The material issues identified and validated by the **Sustainability Committee and the Audit Committee** are as follows:

Environment	
Product innovation & lifecycle	 
Virgin & recycled raw materials	
Direct & indirect greenhouse gas emissions	
Energy efficiency & renewable sources	
Social	
Employee health, safety & well-being	
Product quality, safety & information	
Customer health, safety & satisfaction	
Governance	
Business ethics & anti-corruption	
Regulatory compliance & policies	
Economic value created & distributed	

Circular Economy

We advocate for the principles of the circular economy, ensuring that all our products adhere to a shared philosophy that promotes sustainability.

Committed to producing sustainable products, we continuously develop solutions that minimize their environmental footprint and highlight our **immediate response** to the demands of sustainable development.



12.9
thousand tons

Use of recycled raw materials in 2023



30%

Target to increase recycled raw material usage by 2025 compared to 2021



-21.7%

Reduction in solid waste sent to landfill compared to 2022



-40%

Target to increase recycled raw material usage by 2025 compared to 2021

Product innovation & lifecycle

Material Topic
[GRI: 3-3]

COMMITMENT

The Group puts the principles of the circular economy into practice throughout the entire lifecycle of its products, with targeted actions across all business activities.

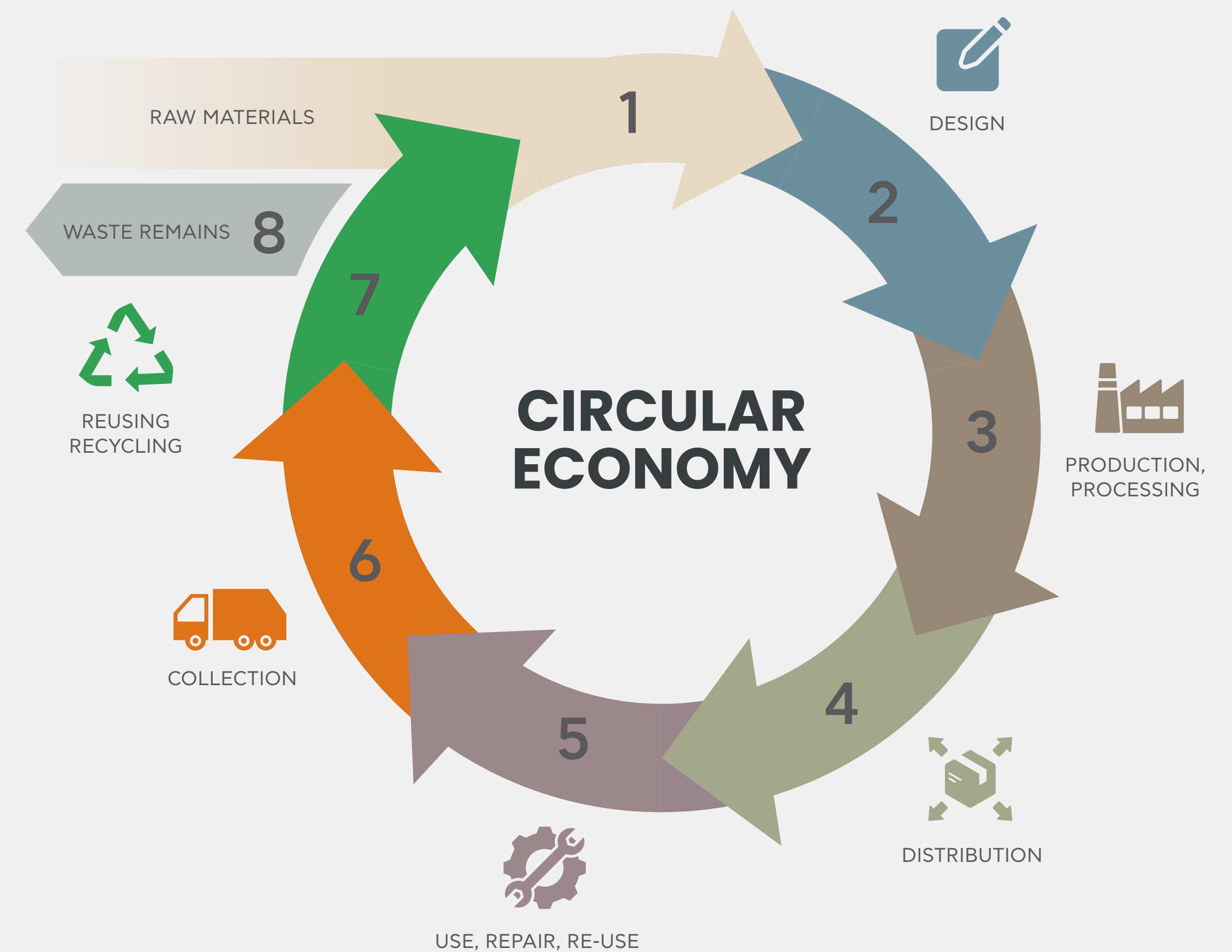
Through close collaborations, it develops innovative products with added value that incorporate effective practices, enhancing their sustainability and making a significant contribution to environmental protection. For this reason, the Group emphasizes the management of waste directed to landfill and sets diversion goals.



Circular economy in practice

Sustainable actions at every stage of the circular economy

1. Sourcing raw materials with a low environmental footprint
2. Designing innovative and sustainable products with a focus on using recycled materials according to technical specifications
3. Optimizing production processes and reducing energy consumption
4. Selecting means and routes based on environmental impact
5. Producing reusable products to maximize their lifecycle
6. Collecting recyclable materials through closed-loop systems for upgraded recycling
7. Reliable traceability and recyclability information through recognized certifications
8. Maximizing waste utilization to continuously reduce landfill disposal



Products and solutions that make a difference for a sustainable future

Technical Fabrics



Geogrids

- **Enhance Resilience:** Significantly contribute to the durability and longevity of civil engineering projects
- **Resource Efficiency:** Save substantial quantities of natural raw materials
- **Carbon Footprint Reduction:** Lower the overall carbon footprint
- **Minimize Microplastic Release:** Reduce the emission of microplastics



Helios Reflect System

- **Weed and Erosion Control:** Eliminates weed growth and soil erosion
- **Enhanced Solar Efficiency:** Increases solar light reflection and boosts energy output of double-sided solar panels by 5-15%
- **End-of-Life Recycling:** Fully recyclable at the end of its lifecycle



Flame Retardant Groundcover

- **European Patent:** Secured with a European patent
- **Healthy Growing Environment:** Promotes a healthy cultivation environment
- **Increased Productivity:** Enhances agricultural productivity
- **Solar Reflectivity:** Increases solar light reflection
- **Proven Durability:** Demonstrates durability with the potential for reuse
- **Fire Risk Reduction:** Reduces the risk of fire spread



Insulation membranes

- **Zero Leakage:** Ensures no leaks
- **Maximum Thermal Performance:** Delivers superior thermal insulation
- **Extreme Weather Protection:** Shields against harsh weather conditions
- **High Durability:** Offers long-lasting resilience
- **Low Carbon Footprint:** Features the option for recycled raw materials
- **BBA Certification:** Certified by the British Board of Agrément

Packaging Solutions



Thermoforming IML Dairy Cups

- **Lightweight:** Uses up to 40% less plastic
- **IML Decoration:** Features in-mold labeling for enhanced design
- **Sustainable Materials:** Made from 30% certified bioplastic.
- **Recyclable:** Fully recyclable at the end of its life cycle.



Reusable Cup with Lid

- **Lightweight:** Designed for easy handling and transport
- **Reusable:** Durable and suitable for multiple uses.
- **Recyclable:** Fully recyclable at the end of its life cycle.



Paper Cups

- **Single or Double Wall:** Available in both single and double-wall constructions for insulation
- **For Hot or Cold Beverages:** Versatile design suitable for both hot and cold drinks
- **With Paper Lid (Patent Pending) or Reusable Plastic Lid:** Choice of a sustainable paper lid or a durable, reusable plastic lid.



Bag in box

- **Extended Product Lifespan:** Designed for enhanced durability and longevity
- **Recyclability:** Fully recyclable materials to support sustainability
- **Maximum Protection:** Provides superior protection for contents



Paint Containers

- **Recycled Content:** Made from up to 96% recycled material
- **Certification:** Verified through RecyClass
- **Low Carbon Footprint:** Designed to minimize environmental impact



Garbage Bags

- **Recycled Material:** Made entirely from recycled content
- **Certification:** Meets RecyClass standards for recyclability
- **High Strength and Flexibility:** Designed for durability and elasticity
- **Low Carbon Footprint:** Engineered to reduce environmental impact.



Big Bags

- **Enhanced Recycling Process:** Utilizes a closed-loop system for advanced recycling
- **Low Carbon Footprint:** Designed to minimize environmental impact.

Critical raw materials

[ATHEX ESG: SS-E7]

- Deliberate avoidance of the 27 Critical Raw Materials as Identified by the European Commission

Research and innovation focused on developing sustainable products

[SASB: RT-CH-410a.1, ATHEX ESG: SS-E5]

- With minimal weight while maintaining the same durability
- Reusable
- 100% recyclable
- Made from a single material
- With up to 30% natural materials
- With up to 100% recycled materials

Product certifications

- Product certifications by RecyClass or TUV OK, ensuring the traceability of recycled plastics
- Environmental Product Declarations (EPD®) for representative products types, based on Life Cycle Assessments (LCA).

Solid waste management

[GRI: 306-1, 306-2, ATHEX ESG: A-E3]

- Reduction of the percentage sent to landfill
- Waste separation by stream for reuse or recycling
- Collaboration with external licensed waste managers for optimal processing
- Employee awareness and training
- Data recording and evaluation



Use and management of chemicals

[SASB: RT-CH-410b.2, ATHEX ESG: SS-E8]

- Full compliance with legal requirements for the use of chemicals
- Employee training and education on the safe use of chemicals
- No use of chemicals or other hazardous substances subject to national or international bans
- Temporary storage with all necessary safety measures
- Collaboration with an external licensed partner for the safe disposal of hazardous waste.

IMPACT

Solid waste

[GRI: 306-3, 306-4, 306-5, SASB: RT-CH-150a.1, ATHEX ESG: A-E3]



Hazardous Waste in 2023

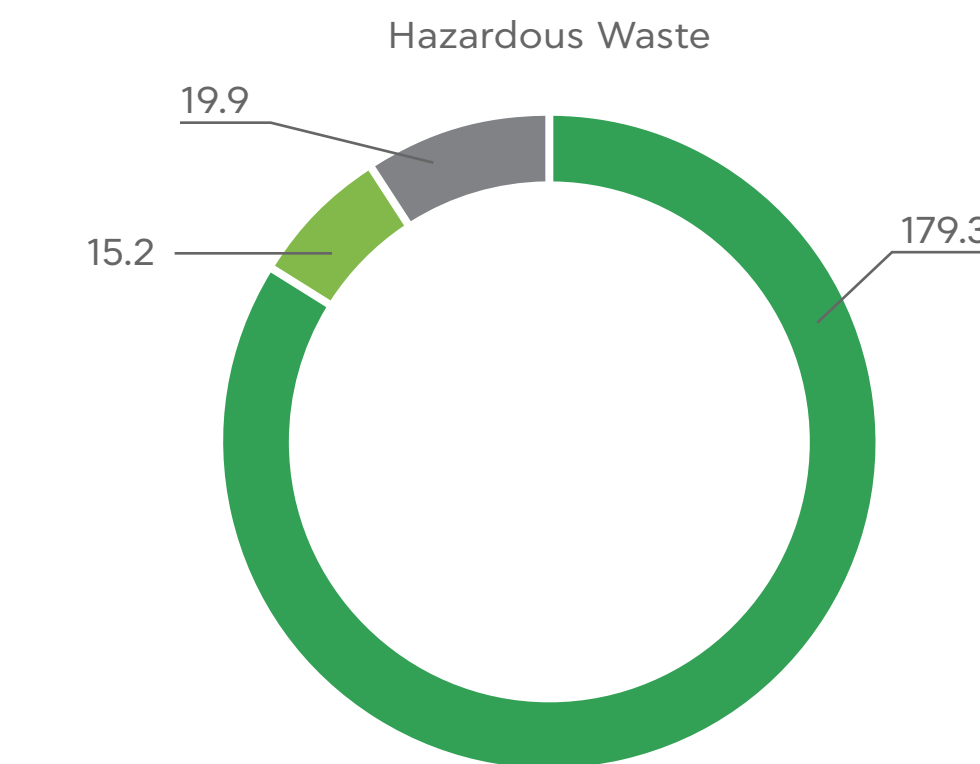
214.4 t

223.9 t in 2022

Change 2023/2022

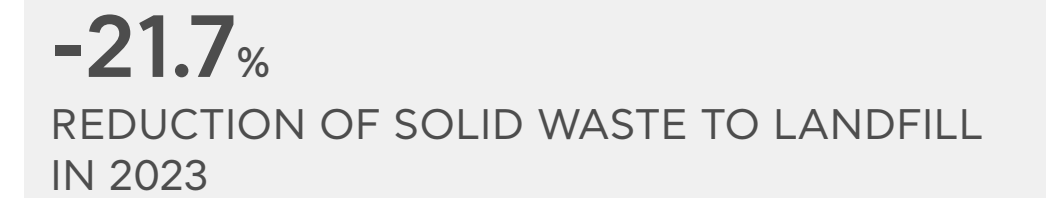
-4.2%

2.8% 2022/2021



- Recycling
- Energy Recovery
- Incineration

The complete information is included in Table 1 (Appendix)



Non-Hazardous Waste in 2023

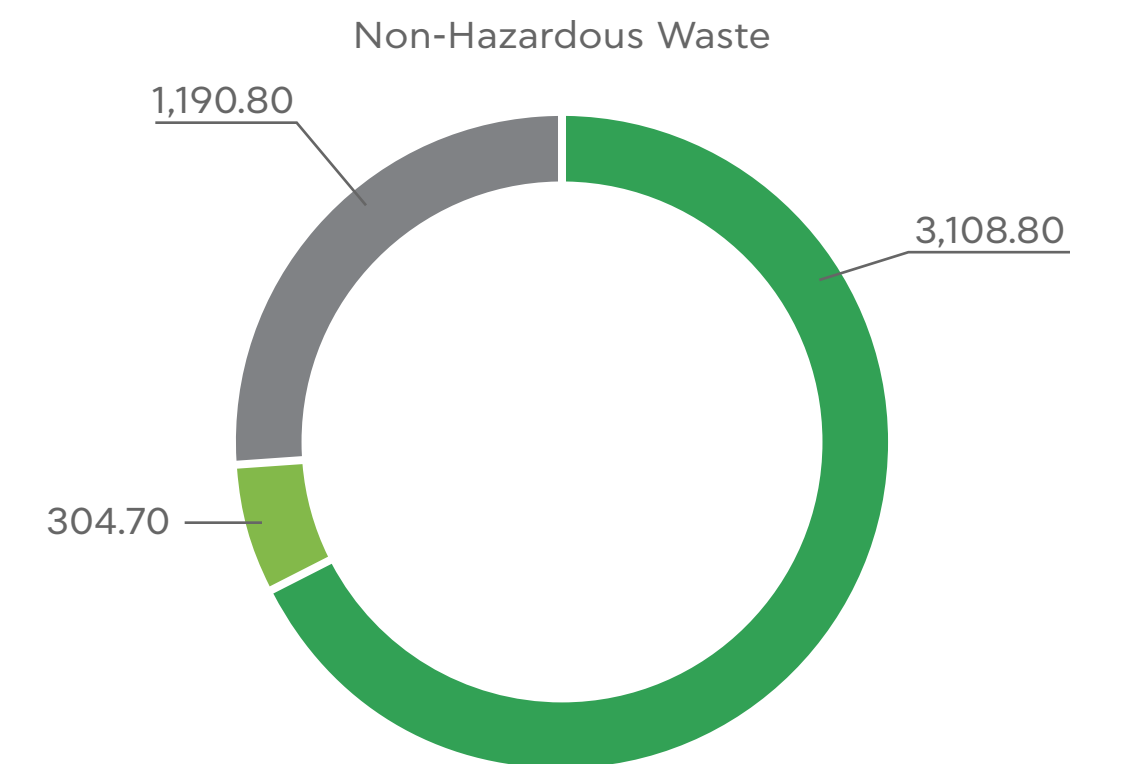
4,604.3 t

5,291.2 t in 2022

Change 2023/2022

-13.0%

21.4% 2022/2021



- Recycling
- Energy Recovery
- Landfill Disposal

Networking through the “In the Loop” circular economy platform

- Networking among companies, brands, public institutions, and consumers
- Contribution to reducing the environmental footprint across the entire value chain
- Design of specialized reuse systems with tracking and certification of usage counts
- Design of specialized systems for advanced closed-loop/controlled recycling



200+ PARTNERING ORGANIZATIONS



Virgin & recycled raw materials

Material Topic

[GRI: 3-3]

IMPACT

Total raw materials (in t)

[GRI: 301-1]

Raw materials in 2023

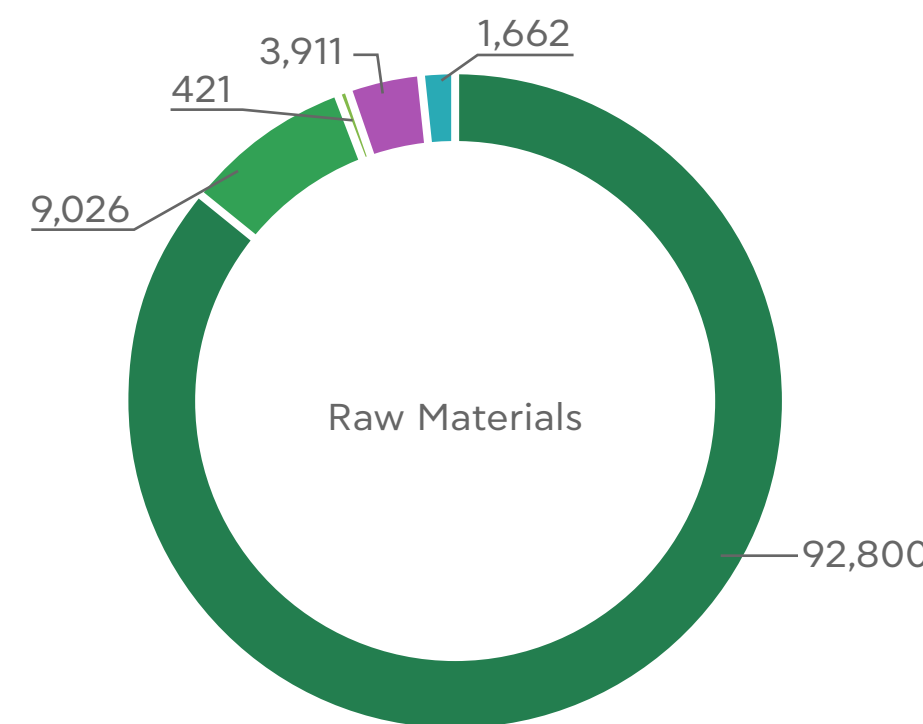
107,829 t

99,470 t in 2022

Change 2023/2022

8.4%

-3.7% 2022/2021



- Polypropylene
- Polyethylene
- PET/Polystyrene
- Masterbatch
- Paper

The complete information is included in Table 2 (Appendix)

Total weight of recycled raw materials(in t)

[GRI: 301-2]

Recycled raw materials in 2023

12,976 t

13,407 t in 2022

Change 2023/2022

-3.2%

17.2% 2022/2021

The complete information is included in Table 3 (Appendix)

Total weight of packaging materials (in t)

Packaging materials in 2023

7,109 t

6,938 t in 2022

Change 2023/2022

2.5%

-1.7% 2022/2021

The complete information is included in Table 4 (Appendix)



COMMITMENT

A priority for the Group is the conservation of natural resources through the use of recycled raw materials. Through continuous investments in advanced recycling machines and close collaborations with specialized entities, the Group achieves optimal utilization of available resources and reduces its environmental footprint.

Emphasis is placed on the percentage of raw material replaced with recycled content, as well as on the quality of the recycled raw material produced to meet high-quality standards.

Use of recycled raw materials

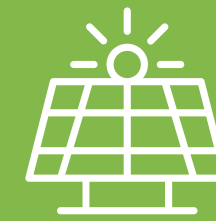
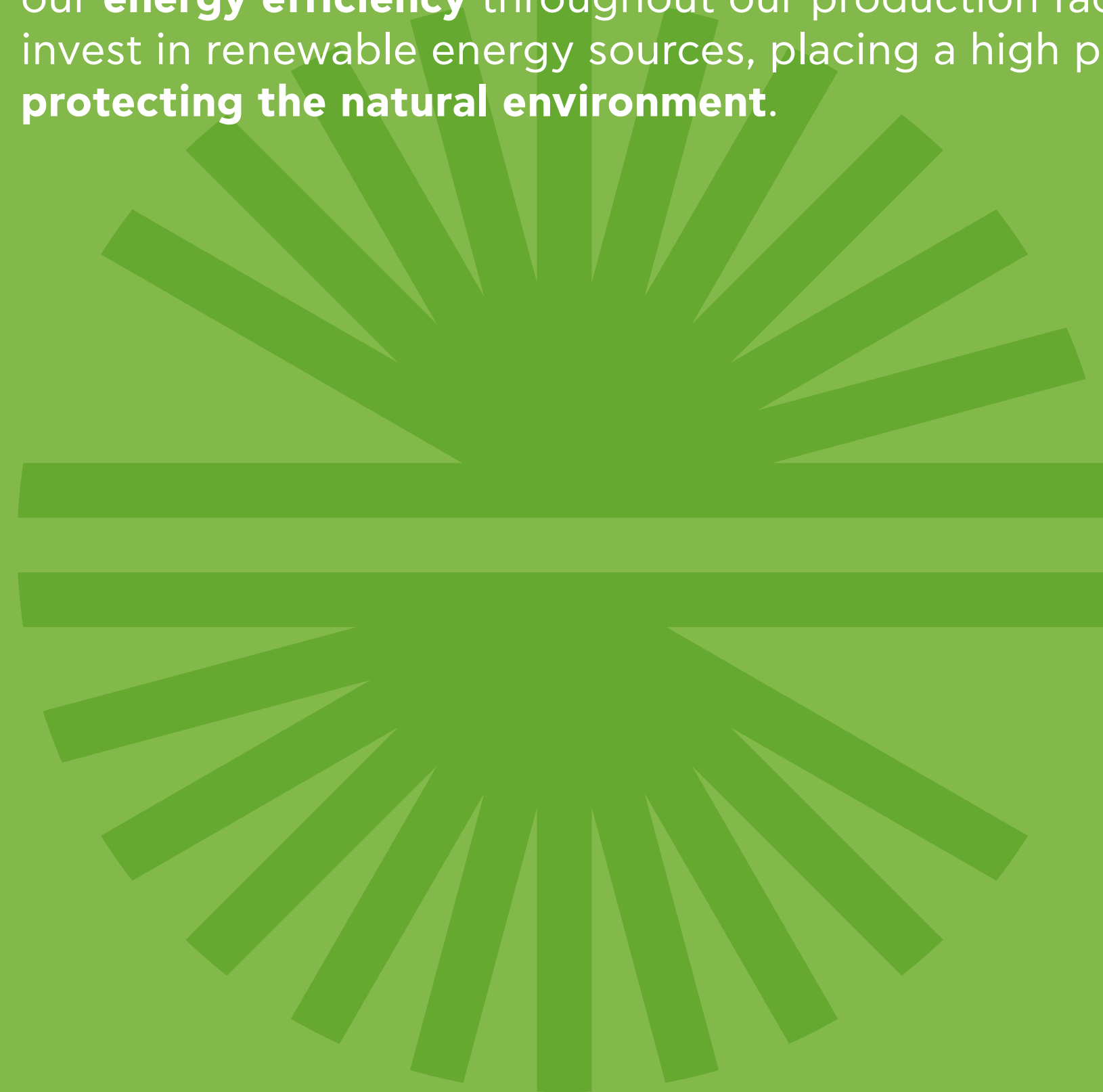
- Operation of a central unit specialized in recycling and investment in state-of-the-art equipment
- 100% recycling of production scrap
- Securing external sources of recycled raw materials
- Staff training and awareness



Climate Change



By **adapting flexibly** across all sectors, we consistently improve our **energy efficiency** throughout our production facilities and invest in renewable energy sources, placing a high priority on **protecting the natural environment**.



10.8 MW

Capacity of photovoltaic systems in 2023



22.3%

Increase in the use of energy from renewable sources compared to 2022



7.8%

Use of energy from renewable sources compared to 2023



10%

Target for renewable energy use by 2025 based on current productivity levels

Energy efficiency & renewable energy sources

Material Topic

[GRI: 3-3]

IMPACT

Energy consumption by type and source

[GRI: 302-1, SASB: RT-CH-130a.1, ATHEX ESG: C-E3]

Energy Consumption in 2023

195,802 MWh

190,150 MWh in 2022

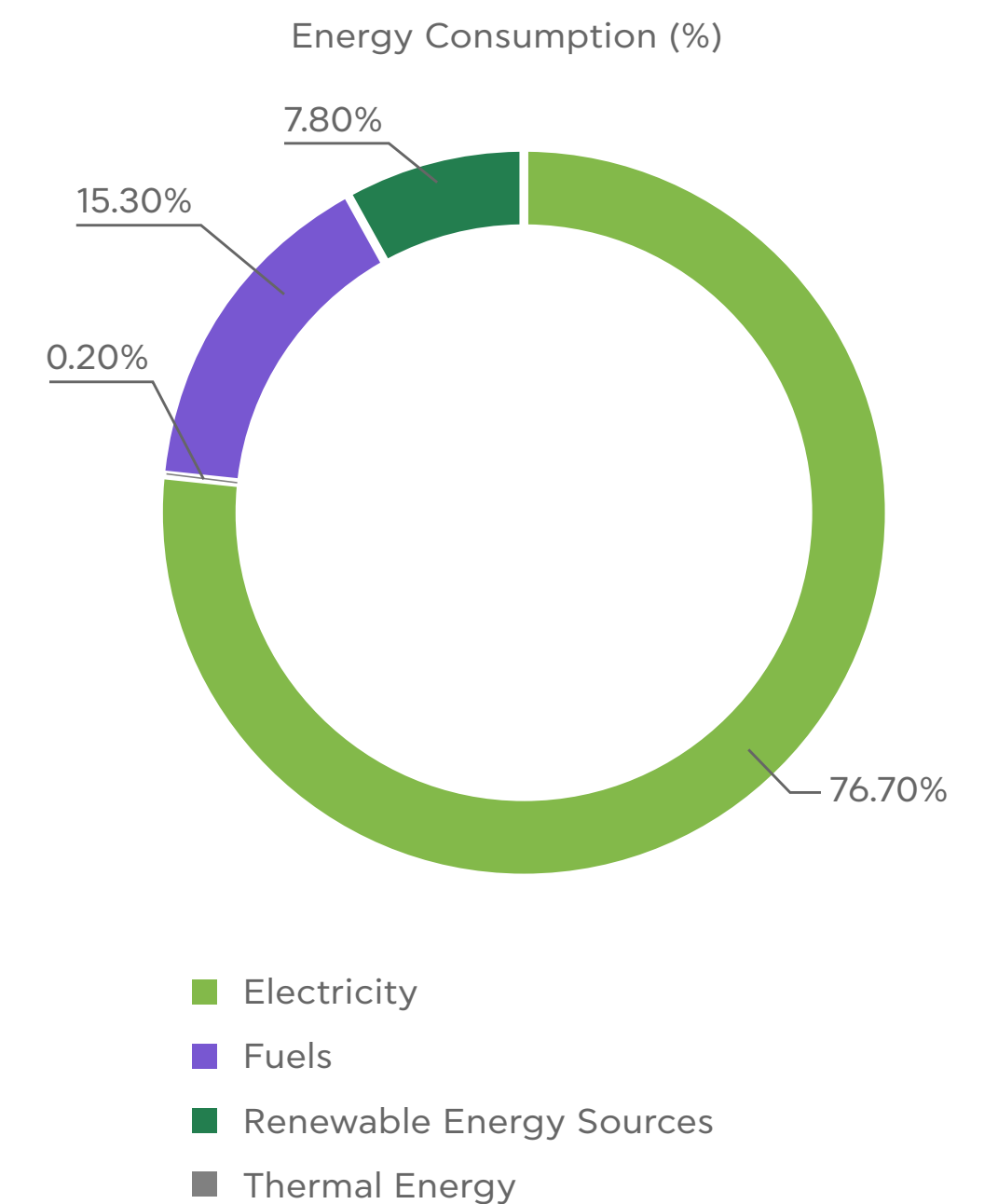
Change 2023/2022

3.0%

-6.5% 2022/2021

Non-Renewable Sources	
Electricity	540,574,273
Thermal Energy	1,317,776
Fuel	107,800,160
Renewable Sources	
Solar Energy (photovoltaics)	42,507,401
Geothermal Energy	11,427,874
Hydroelectric	1,258,380
Total (MJ)	704,885,865
Total (MWh)	195,802

Energy consumption by type and source (%)



The complete information is included in Table 5 (Appendix).



COMMITMENT

Improving energy efficiency in production processes and increasing the use of energy from renewable sources are the two main pillars on which the Group's production model is built. To this end, a goal has been set for using energy from renewable sources.

In this context, the Group implements advanced technologies and processes to reduce energy consumption and invests in high-performance, environmentally friendly equipment.




2025 TARGET

10% ENERGY CONSUMPTION FROM RENEWABLE SOURCES WITH SELF-GENERATION according to current productivity levels

Investment in renewable energy sources

[GRI: 302-3]

- The Group invests in the use of energy from renewable sources.
- It harnesses solar, geothermal, and hydroelectric energy to meet a portion of its energy needs.



ANNUAL PERFORMANCE

10.8 MW CAPACITY OF PHOTOVOLTAIC SYSTEMS
6.7 MW in 2022

7.8% USE OF RENEWABLE ENERGY SOURCES IN 2023
22.3% INCREASE COMPARED TO 2022

Energy efficiency

[GRI: 302-3, 302-4]

- Recording of energy consumption through modern monitoring systems
- Reduction of energy consumption through the Energy Efficiency Project aimed at achieving optimal efficiency by implementing specific measures and actions
- Upgrade of electromechanical equipment
- Training of employees

Direct & indirect greenhouse gas emissions

Material Topic

[GRI: 3-3]



COMMITMENT

The Group is committed to implementing ongoing and targeted actions to reduce direct emissions in its production processes and indirect emissions from energy consumption. Additionally, by closely collaborating with suppliers and partners, it aims to reduce indirect emissions throughout all stages of the value chain.

This includes continuously assessing and improving sustainability practices across all its activities, thereby enhancing its resilience and competitiveness in the global market. Moreover, through its products, the Group supports its partners in achieving their sustainability goals.

Recording of direct and indirect greenhouse gas emissions

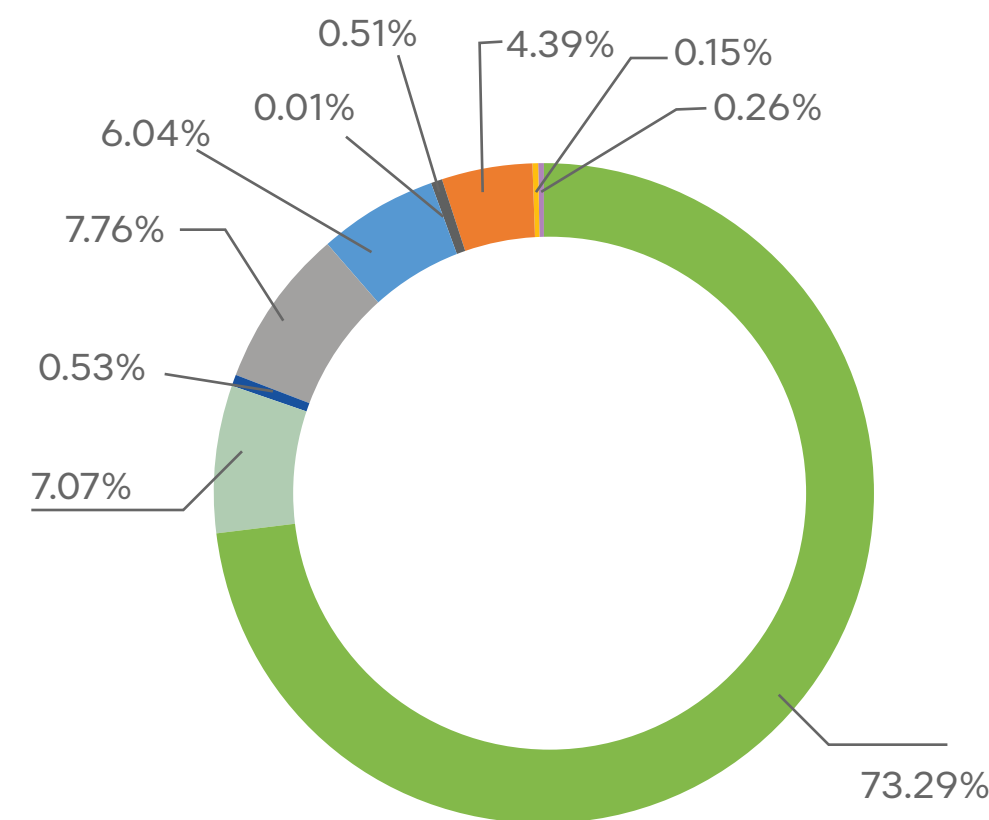
[GRI: 305-1, 305-2, 305-3, SASB: RT-CH-110a.1, ATHEX ESG: C-E1, C-E2, A-E1]

- Utilization of a specialized platform aligned with the GHG Protocol methodology and ISO 14064-3.
- Collection of required data for each category (Scope 1, 2, 3)
- Conversion of data into CO₂ emissions

- Identification of key areas for improvement
- Implementation of measures to reduce emissions
- Monitoring progress in relation to set targets

Indirect emissions (Scope 3) in tCO₂e

[ATHEX ESG: A-E1]



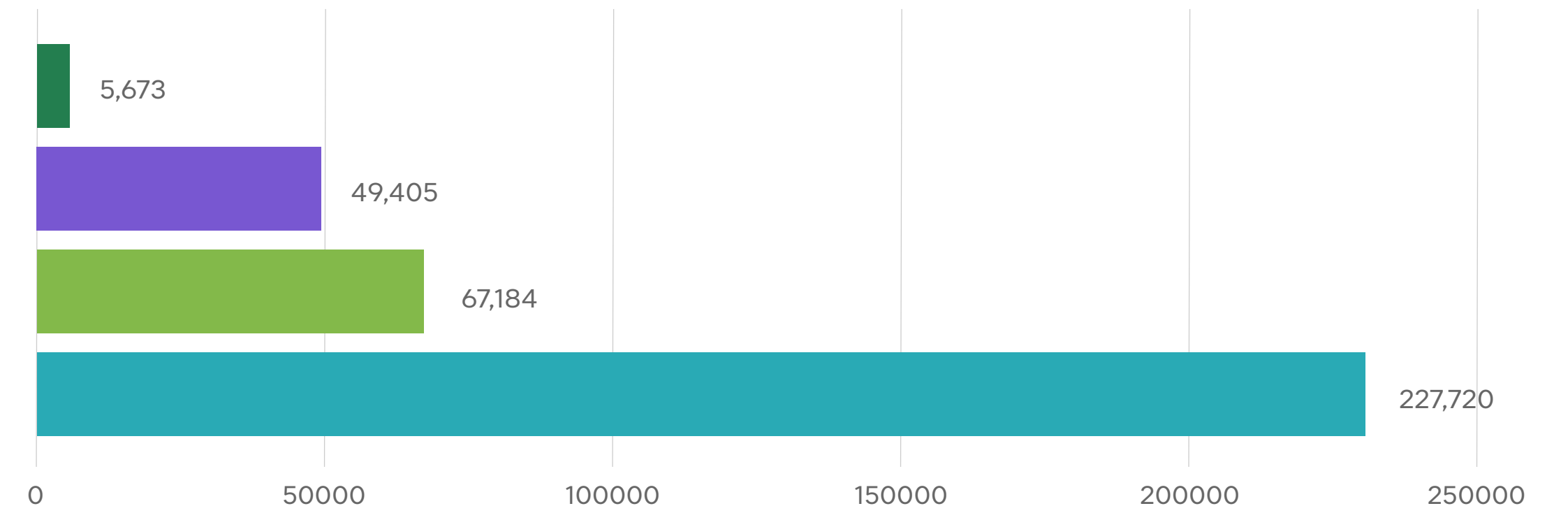
- Purchased goods and services
- Upstream transportation and distribution
- Business travel
- Downstream transportation and distribution
- Fuel- and energy-related activities
- Leased assets
- Waste generated
- Capital goods
- Product end-of-life treatment
- Employee commuting

IMPACT

Direct and indirect carbon emissions

[GRI: 305-1, 305-2, 305-3, 305-5, SASB: RT-CH-110a.1, ATHEX ESG: A-E1, A-E8, C-E1, C-E2]

Following are the data collected in accordance with ISO 14064-3 for the year 2023, including a comprehensive analysis of Scope 1, 2, and 3 emissions, which are currently undergoing external verification.



- Direct emissions (Scope 1)
- Location-based indirect emissions (Scope 2)
- Market-based indirect emissions (Scope 2)
- Indirect emissions related to the value chain (Scope 3)

The complete information is included in Table 6 (Appendix)

Emission intensity indicators (tCO₂e/t production)

[GRI: 305-4]

Emission intensity in 2023	Change 2023/2022
0.501 (Scope 1-2)	-0.3%
2.074 (Scope 3)	-4%

Biodiversity conservation

Biodiversity protection and conservation

[GRI: 304-2, ATHEX ESG: A-E5]

- The Group's circular economy-oriented strategy aims to keep products in the economic cycle for as long as possible and certainly away from the environment, thereby mitigating negative impacts on biodiversity.
- Through the ZERO PELLETT LOSS project, which is active at all production facilities, the goal is to prevent the release of microplastics into the environment. The project includes defining appropriate storage and handling procedures, conducting inspections to identify risks, implementing corrective actions, and providing employee training.

Water consumption management

[GRI: 303-1, ATHEX ESG: SS-E3, SS-E4]

- Water Consumption Monitoring
- Preventive maintenance on cooling/heating systems to address potential leaks
- Water collection and recycling systems
- Automatic switches at drinking water points
- Signage for rational use of drinking water
- Staff awareness initiatives for reducing consumption

Wastewater management

[SASB: RT-CH-140a.3, ATHEX ESG: A-E4]

- Full compliance with legal requirements for wastewater management
- Active contracts with specialized management companies for optimal handling



Climate risk assessment

[GRI: 201-2, ATHEX ESG: A-E2]

- To identify opportunities and assess both physical and transition risks related to climate change, the Group considers the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) established by the Financial Stability Board.
- The climate crisis and energy transition impact the Group's activities while simultaneously creating significant opportunities, particularly through the principles of the circular economy, the use of recycled raw materials, and investment in renewable energy sources.
- The Group acknowledges the risks and impacts that climate change may pose to its business operations, such as extreme weather events or rising temperatures, which could affect production processes in the short, medium, and long term.
- To mitigate these risks and avoid negative socio-economic and environmental impacts, the Group continuously stays up-to-date and monitors international developments and adjusts its business model. It has identified the following categories of climate-related risks as well as transition opportunities towards a low-carbon business model with a focus on innovation.
- These risks and opportunities have been considered in shaping the sustainable development strategy and in setting goals and actions.

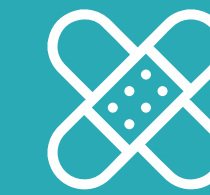
Types:	Risks related to:	The Group:
Policy & Legal	the ongoing changes in the European and national regulatory framework that create future requirements	monitors the national and international regulatory framework related to the environment, particularly in the areas of technical textiles and packaging, with regard to waste management, recycling, the use of secondary raw materials, and the sustainable attributes of products
Technology	the transition to a low-carbon economy, which involves adapting production processes to meet new requirements	monitors technological advancements that could enhance innovation and optimize production processes, and identifies potential risks in its internal processes related to the need for equipment modernization, enabling timely investments in new technologies
Market	with changes in the industry's structure towards a carbon-sensitive economy model	assesses environmental risk related to incomplete and non-transparent carbon emissions information and records both direct and indirect emissions associated with its operations and value chain
Reputation	with changes in consumer preferences	identifies transition risks related to changes in consumer preferences by providing sustainable solutions with a verified positive environmental impact through life cycle assessments (LCA)

Types:	Opportunities emerging for:	The Group:
Energy Sources	from the increased use of renewable energy sources and the effort to gradually reduce energy consumption	invests in photovoltaic systems and geothermal energy to reduce greenhouse gas emissions through the use of renewable energy sources and continuously implements measurable actions aimed at energy savings
Market	from the shift of existing markets towards new sustainable products and processes, where the use of recycled materials or reuse adds value for the customer	develops specialized advanced recycling systems that enable the tracking and certification of the percentage of recycled raw materials, as well as reuse systems that allow for the tracking and certification of the number of uses
Products and Services	from the development of products and solutions based on the circular economy that add value for the customer	implements the circular economy model in practice through specific actions, such as organizing closed-loop recycling systems for producing new products or designing and producing reusable products, with the goal of leading in new markets of innovative, eco-designed products
Resilience	from undertaking projects aimed at improving efficiency during the production process	undertakes targeted projects, such as zero pellet loss, energy efficiency in the production process, waste minimization, and the reuse of production scrap
Resource Efficiency	from the increase in the use of recycled raw materials	prioritizes replacing virgin raw materials with recycled ones, fostering collaborations with suppliers or customers to create a sustainable supply chain, reducing product packaging where feasible, and continuously monitoring the efficiency of production lines

Health & Safety

The **health and safety** of our people, as well as the quality of our products as perceived by our customers and end-users, are our **highest priorities**.

By implementing the **highest standards**, we ensure optimal working conditions and exceptional quality in the solutions we provide.



-12.8%

Reduction in the number of recorded injuries compared to 2022



-11.4%

Reduction in the accident frequency rate compared to 2022

Health, safety & employee well-being

Material Topic

[GRI: 3-3]



COMMITMENT

Guided by the philosophy of 'Safety First,' we are committed to the health and safety of all employees, partners, and visitors.

Our commitment to creating a safe and healthy work environment is realized through diligent oversight, rigorous implementation of procedures, proactive risk identification and mitigation, comprehensive training, and ongoing evaluation of practices to ensure continuous improvement in performance and safety metrics.

Prevention and avoidance of all types of injuries

[GRI: 403-8]

- Establishment and communication of relevant principles, policies, and procedures, along with implementing measures to mitigate workplace accident risks
- Provision of life insurance for employees

Health, Safety, Environment Policy

[GRI: 403-1, 403-4]

- Providing guidance and a unified approach regarding the general principles and key rules established by the Group's Management on Health, Safety and Environmental matters
- Ensuring health and safety in the workplace for all employees, partners, and visitors
- Preventing potential damage to the Group's property and personnel
- Raising awareness among staff on environmental issues, employing eco-friendly production methods, and protecting the environment
- Enhancing the Group's culture regarding Safety, Health, and Environmental matters

Health, Safety, and Environmental Procedures

[GRI: 403-2, 403-3, 403-5, 403-6, 403-7]

- Identification and continuous assessment of workplace risks
- Provision of all required Personal Protective Equipment (PPE) to employees and training on its proper use
- Establishment of corrective or preventive actions aimed at eliminating risks and minimizing the likelihood of accidents
- Designation of a responsible person to oversee compliance with procedures at each facility

- Employee information and awareness through messages displayed on screens
- Implementation of safety measures for the facilities
- Verification of the implementation of measures by labor inspectors and certification bodies
- Studies on noise, odor, light, and vibration levels, ensuring compliance with legal requirements
- Emergency response and evacuation plans
- Regular monitoring and implementation of preventive and corrective measures
- Tracking and recording of safety-related incidents at the facilities
- Identification of potential hazards, risk assessment, and execution of corrective actions to reduce accidents
- Evaluation of the effectiveness of corrective actions and the recurrence of incidents



IMPACT

Workplace injuries

[GRI: 403-9, SASB: RT-CH-320a.1, ATHEX ESG: SS-S6]

Number of recorded injuries in 2023

41

47 in 2022

Change 2023/2022

-12.8%

-34.3% 2022/2021

Accident frequency rate* in 2023

2.17

2.45 in 2022

Change 2023/2022

-11.4%

29.6% 2022/2021

Accident severity rate** in 2023

34.15

30.97 in 2022

Change 2023/2022

10.3%

-7.6% 2022/2021

*The Accident Frequency Rate is related to the number of recorded injuries

**The Accident Severity Rate is related to the number of lost working days

Workplace health

[GRI: 403-10, SASB: RT-CH-320a.1, ATHEX ESG: SS-S6]

Number of work-related fatalities

Number of deaths resulting from illness

Number of confirmed illnesses

0

The complete information is included in Table 7 (Appendix)

Product quality, safety & information

Material Topic

[GRI: 3-3]



COMMITMENT

We are committed to exceptional product quality through stringent quality processes and transparent product information. The Group is dedicated to manufacturing products that adhere to high standards of performance and reliability. This involves utilizing premium materials, state-of-the-art production technologies, and rigorous quality control procedures.

Our priority is to deliver innovative, top-quality products that not only meet but exceed customer expectations while ensuring their safety and well-being.

Quality management processes

[ATHEX ESG: SS-S1, SS-S8]

- Raw Material Inspection: Conducting assessments of raw materials through trial production and laboratory comparisons with similar products
- Product Inspection: Monitoring products throughout all stages of production, including dimensional checks, mechanical property tests based on international standards, and ensuring product alignment with specifications and customer requirements

- Packaging and Transportation Inspection: Utilizing packaging that ensures smooth and safe transport. This includes performing visual quality checks during loading and implementing scanning systems to ensure only approved products are loaded
- Customer Satisfaction Inspection: Regular direct communication (through sales departments) or indirect communication (through questionnaires) with customers to optimize the services provided

Promotion of transparency in product information and customer communication

[GRI: 417-1, ATHEX ESG: SS-S7]

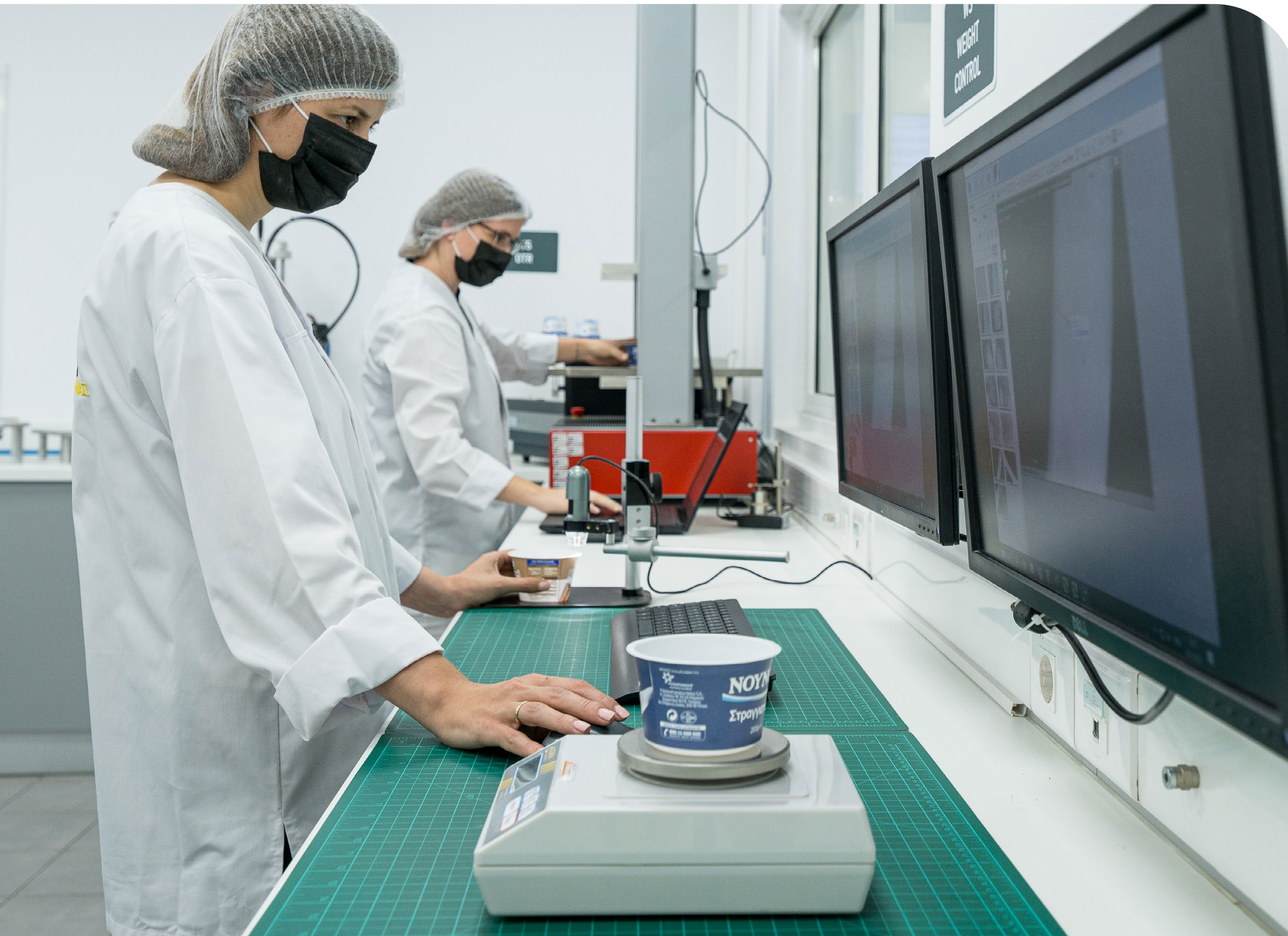
- Compliance with applicable national legislation
- Adoption of management systems and procedures in accordance with international standards, safety regulations, and best practices related to product design and lifecycle
- Monitoring adherence to all specifications through regular quality checks
- Inspection of products throughout all stages of the production process in accordance with international management systems and standards (such as BRC, ISO 22000 and 9001, FDA, and IFS)
- Providing end-users with information on product technical specifications and performance through clear labeling, informative labels, or technical documents, based on the type of product.

IMPACT

Product quality and health & safety of end users

[GRI: 416-2, ATHEX ESG: SS-S1]

In 2023, there were no instances of non-compliance with current legislation and applicable regulations concerning the impact of products on the health and safety of end users that would necessitate a product recall or require financial compensation.



Customer health, safety & satisfaction

Material Topic

[GRI: 3-3]



COMMITMENT

Ensuring the health and safety of customers, consumers, and end-users is a top priority and commitment for the Group.

This sector is intrinsically linked to the quality of the products offered, and as such, it is treated as an interconnected process with the primary goal of achieving high levels of customer satisfaction through the provision of high-quality products

- Products are monitored at all stages of the production process, and management systems and procedures have been implemented in accordance with various international standards to ensure quality.
- Quality management systems are adopted based on international food safety standards, such as ISO 22000, ISO 9001, IFS, BRC, FDA, and HALAL, with relevant procedures applied to the production of packaging that comes into direct contact with food.
- Through the sales, credit control, and accounts receivable policy, emphasis is placed on continuously improving service levels and customer satisfaction

Product manufacturing with a focus on ensuring the health and safety of customers

[GRI: 416-1, ATHEX ESG: SS-S1, SS-S9]

- Production of innovative products and comprehensive solutions tailored to customer needs and requirements, adhering to all required quality and safety standards
- Regular quality checks to monitor compliance with all specifications, including those related to customer and end-user health and safety

IMPACT

Quality of products that impact customers and end users

[GRI: 416-2, ATHEX ESG: SS-S1]

There were no instances of non-compliance with current legislation and applicable regulations that necessitated a product recall or resulted in financial compensation.

Labor & Social Issues

Our greatest asset is **our people**. We are committed to respecting human rights and practicing corporate **social responsibility** by carefully evaluating our social impact across all areas. Our goal is to create a supportive and fair work environment that encourages professional development and growth.



act:onaid

Supported

16

kids in need

 **Boroume**
saving food - saving lives

Offering food equivalent

1,835

meals



Social Center
"Stavros Halioris"

Total expenditure on social support

410,131€

Additional work-related topics



COMMITMENT

For the Group, ensuring a safe, reliable, and creative work environment is of utmost importance, with a focus on promoting professional development and maintaining a diverse workforce.

The Group places strong emphasis on critical workplace issues, including the protection of employee rights and the ongoing education and training of its staff.

Implementation of recruitment processes for filling new job positions

[GRI: 401-1, ATHEX ESG: C-S4]

- Existing employees are given the opportunity to express their interest through the internal mobility process
- The selection of new employees is based on objective criteria, excluding any possibility of discrimination based on race, religion, gender, nationality, beliefs, age, disability, etc.
- Priority is given to hiring individuals from local communities, and collaboration with local educational institutions and universities is actively pursued

Fair remuneration policy and equal opportunities

[GRI: 2-19, ATHEX ESG: A-G4]

- Implementation of Competency Policy and Remuneration Policy for Board members and Committees, as well as top management positions
- Implementation of Wage and Personnel Management Policy for employees
- Linking professional development and remuneration to personal performance and goal achievement

Employee training and development process

[ATHEX ESG: C-S5]

- The goal of the process is to develop employees and enhance their effectiveness and performance
- Induction training for all new employees focusing on health and safety issues and facility operations
- Internal training is designed to further develop employees, as evolving production methods and advancements in technology necessitate continuous learning
- Targeted training with the involvement of external consultants with high expertise

Training Platform Thrace Academy

- Operational since 2024
- Includes courses organized into modules such as policies and procedures, health, safety and environment, sustainable development, products and applications, and skills enhancement

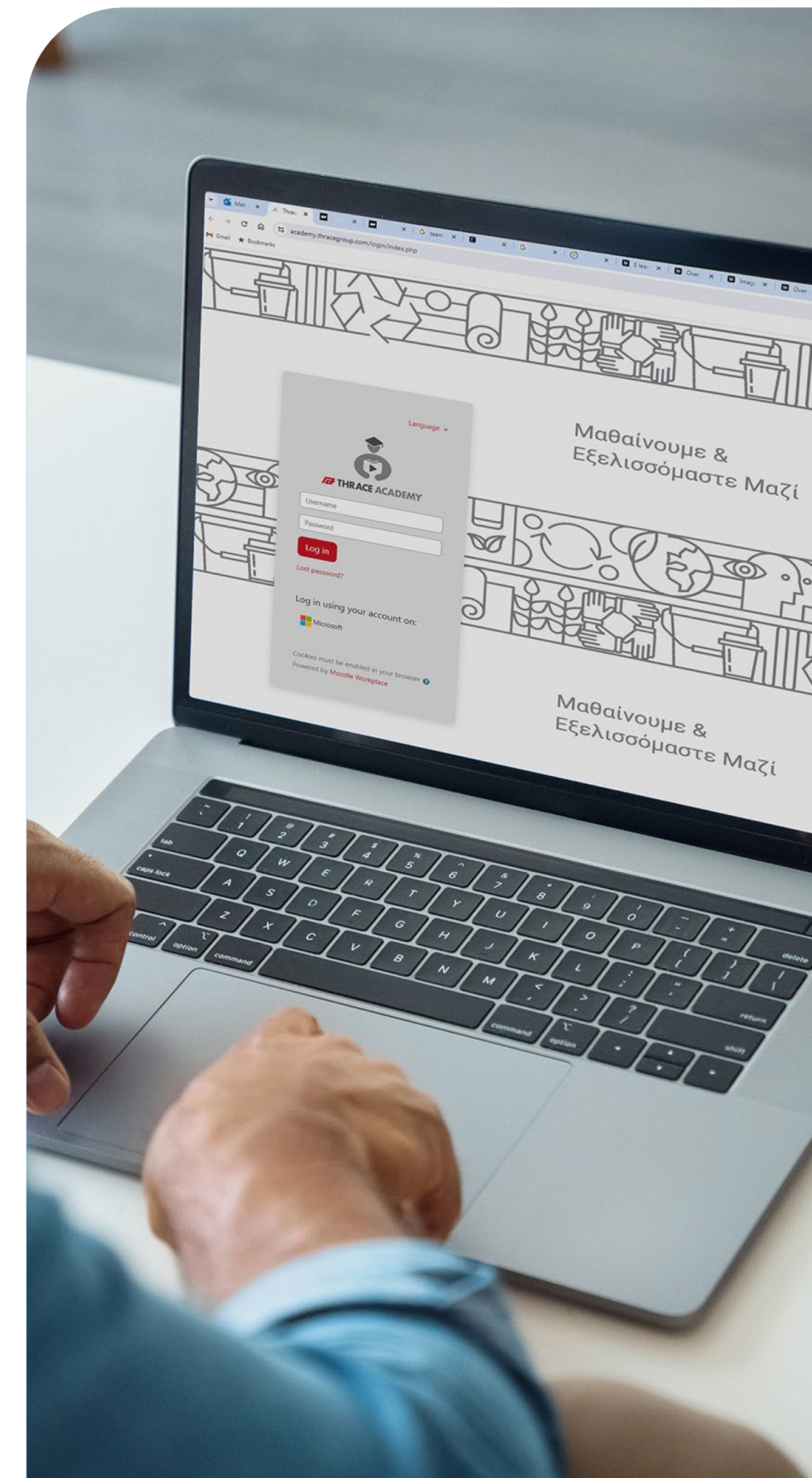
Human Resources Platform HR Hub

- Contribution to employee interaction
- Automation and digitization of processes
- Access to important information about the workplace
- Reduction of processing and waiting times

Freedom of Participation in Labor Unions and the right to collective bargaining

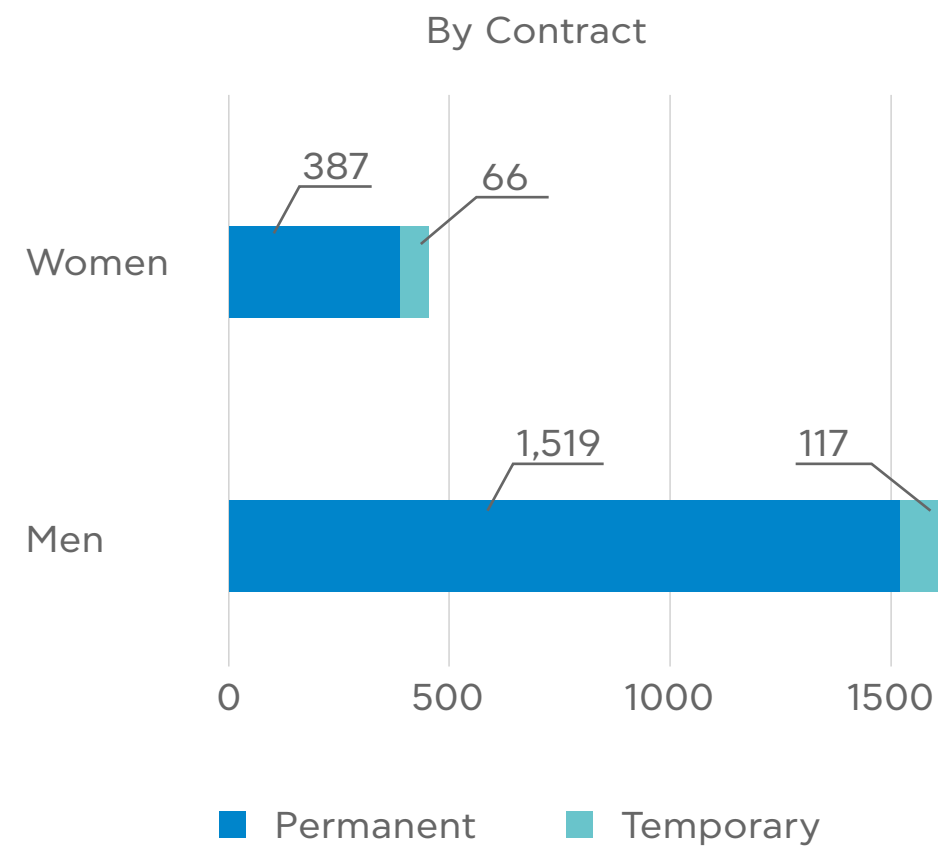
[GRI: 2-30, ATHEX ESG: C-S7]

- Respect for employees' right to join labor unions and associations
- Compliance with the Work Regulation, which has been drafted in collaboration with employee representatives and submitted to labor inspection



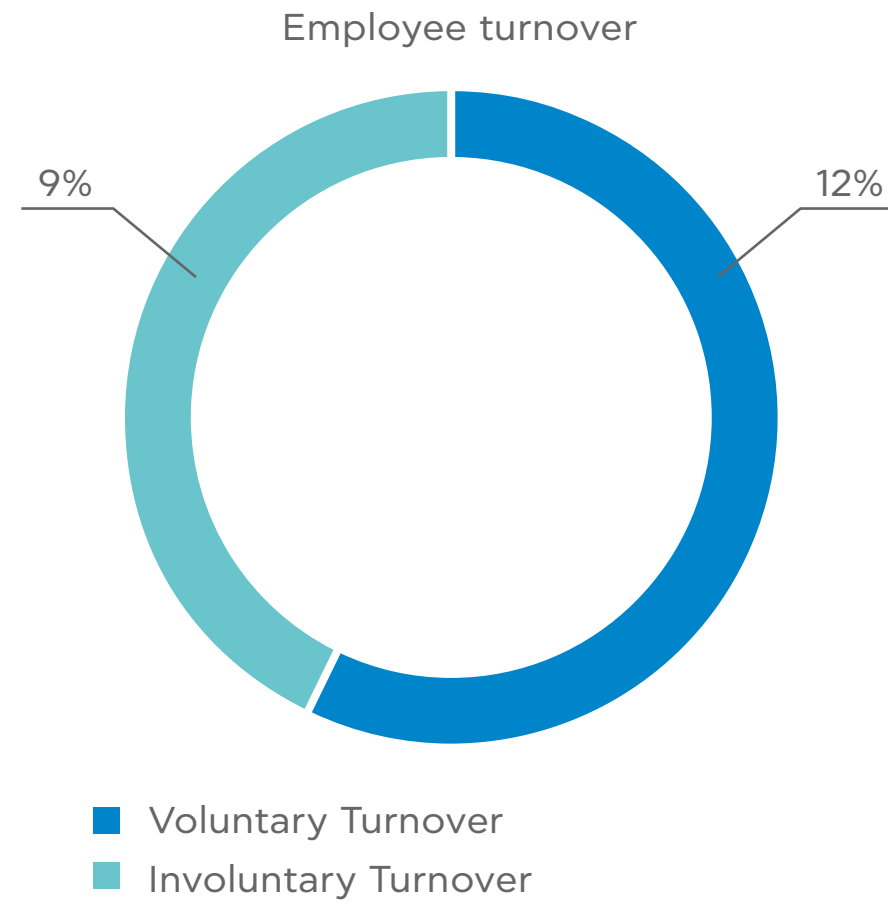
IMPACT

Total number of employees by contract and employment



The complete information is included in Table 8 (Appendix)

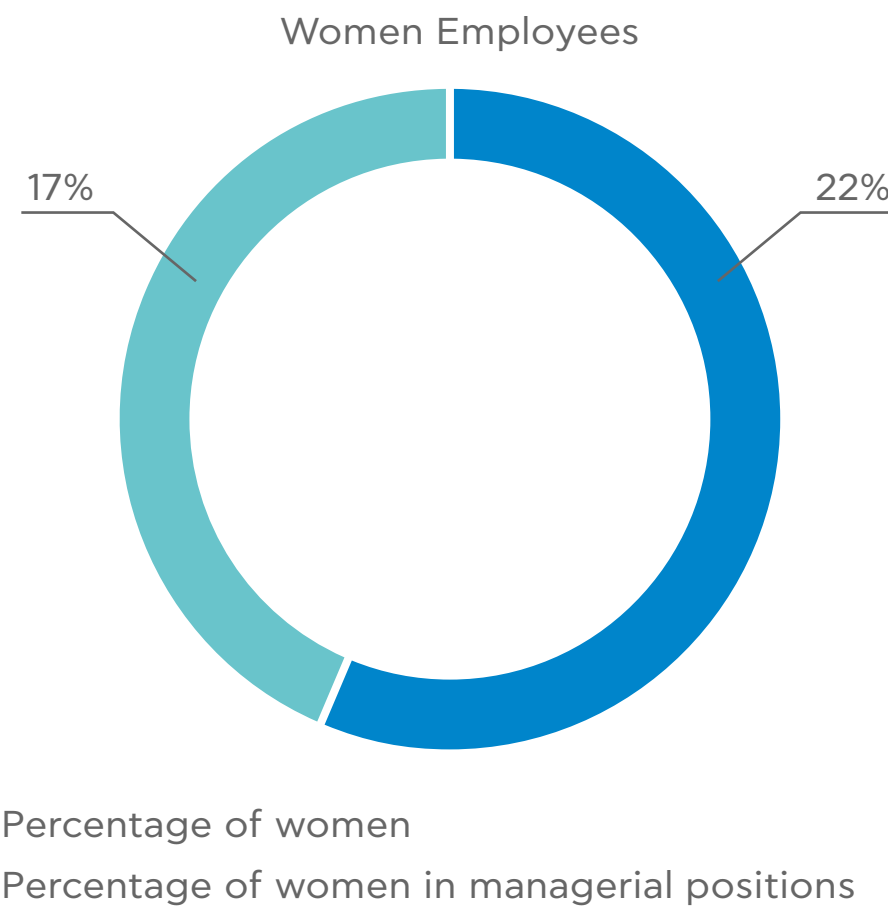
Turnover rate
[ATHEX ESG: C-S4]



The complete information is included in Table 9 (Appendix)

Women employees

[GRI: 405-1, ATHEX ESG: C-S2, C-S3]



The complete information is included in Table 10 (Appendix)

Employee training

[GRI: 404-1, ATHEX ESG: C-S5]

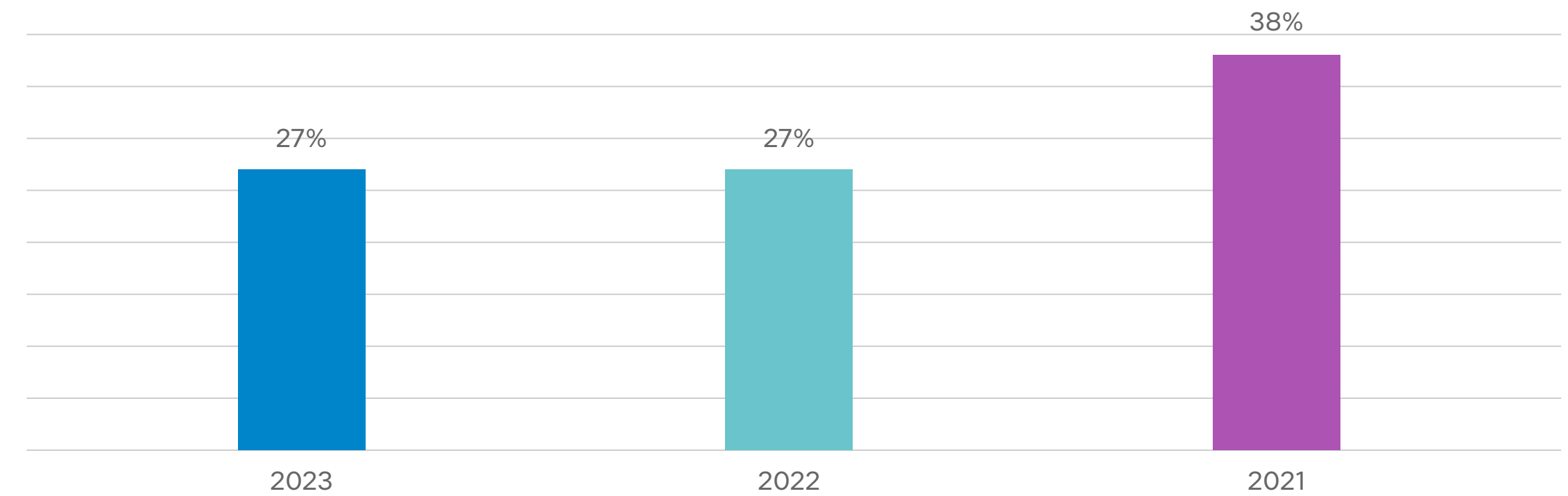
The recorded training hours refer only to training conducted by external providers. They do not include introductory training or internal training, which primarily covers technical topics (such as health & safety, handling, etc.).



Οι συνολικές πληροφορίες περιλαμβάνονται στον Πίνακα 11 (Παράρτημα)

Gender pay gap

[GRI: 405-2, ATHEX ESG: A-S3]



Supporting local communities

COMMITMENT

The Group recognizes the impact and opportunities created by its activities on local communities, committing to promote their well-being and development.

It remains constantly aware of the needs of citizens and communities where it operates and aims to effectively address their real and essential needs. Therefore, it focuses on actions that provide immediate and tangible benefits.

The Group addresses social issues with responsibility and sensitivity and supports the communities in which it operates

[GRI: 413-1, SASB: RT-CH-210a.1]

- Supports the work of organizations with recognized actions to address social issues by backing social solidarity and education programs
- Makes donations to support vulnerable social groups
- Has supported the ActionAid Foster Program since 2016, assisting 16 children in need
- Develops initiatives to reduce food waste by participating in the "Food Rescue and Donation" network through the nonprofit organization "Boroume"
- Supports food-related charitable organizations throughout Greece. According to official data,

the total food provided by Thrace Greenhouses in 2023 corresponds to 1,835 meal portions

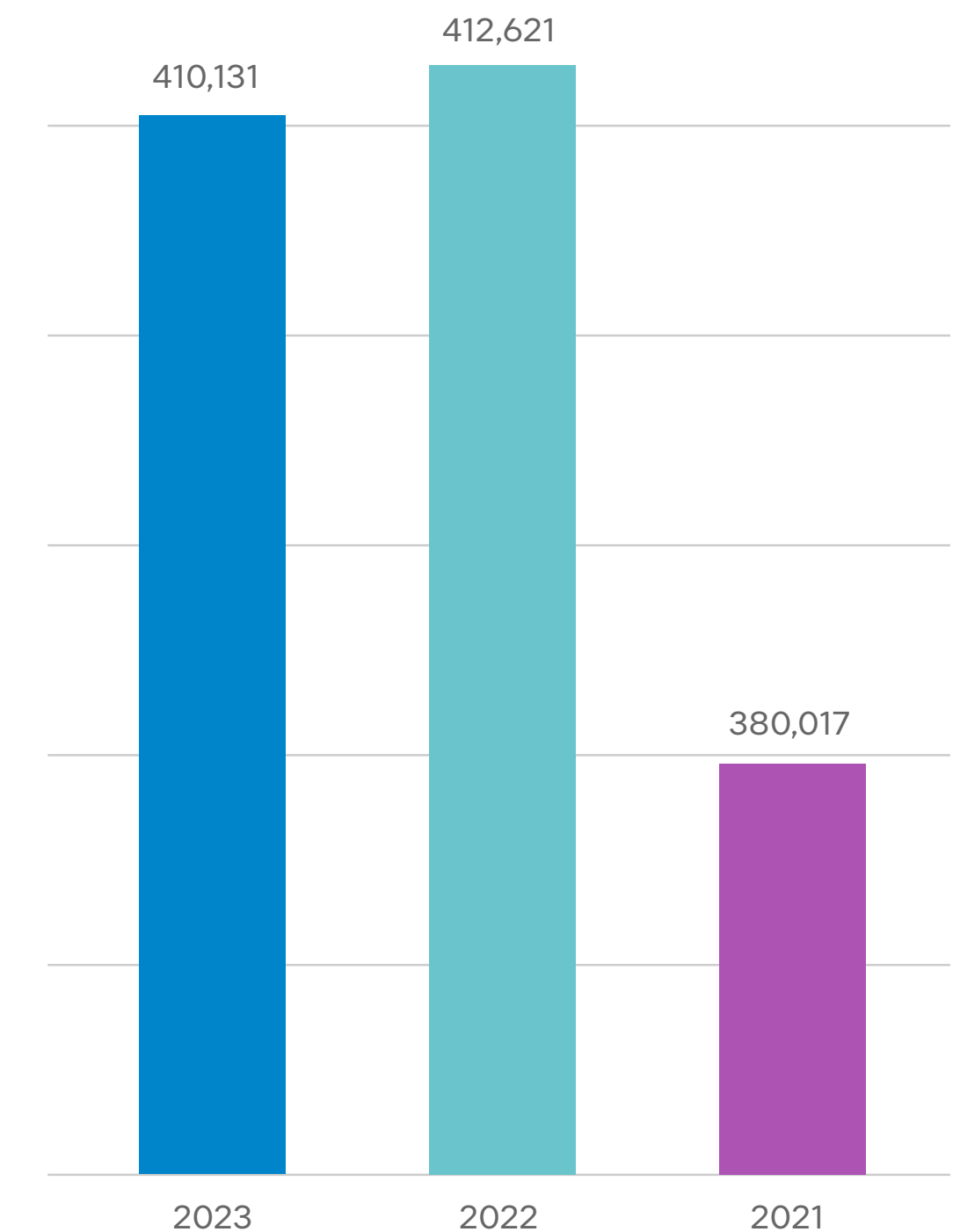
- Supports the operation of the Social Center Stavros Halioris

Social Center "Stavros Halioris"

- An Urban Non-Profit organization based in the Local Community of Magiko, Xanthi, operating since 2010, bearing the name of the late Stavros Halioris, founder and President of Thrace Group.
- The aim of its operations is to make a tangible contribution to society by engaging in activities that are educational, cultural, recreational, and social in nature
- The activities include supporting initiatives of the Employees' Association of the Plastics Thrace Group, providing scholarships and financial aid to local children who wish to pursue higher education but struggle with educational expenses, as well as offering financial support and covering medical treatment costs for impoverished patients in the area.
- The facility also operates a clinic that provides primary healthcare to residents of the broader region and hosts meetings for the KAPI (Local Senior Citizens Center) of Magiko.
- Contemporary influences of climate change have led to the adoption of actions focused on raising awareness among local communities and children about ecological issues, renewable energy sources, and biodiversity conservation

IMPACT

Social support through the Stavros Halioris Social Center (expenses in €)



Corporate Governance

We **promote transparent** and responsible practices that cultivate a culture of trust and effectiveness.

By emphasizing ethical governance, we reinforce the foundations of corporate leadership and governance, securing both sustainable development and the long-term success of the Group.



0

Confirmed Incidents

corruption & bribery

non-regulatory compliance

human rights violations

personal data breaches or violations

342.4

million €

Economic value distributed

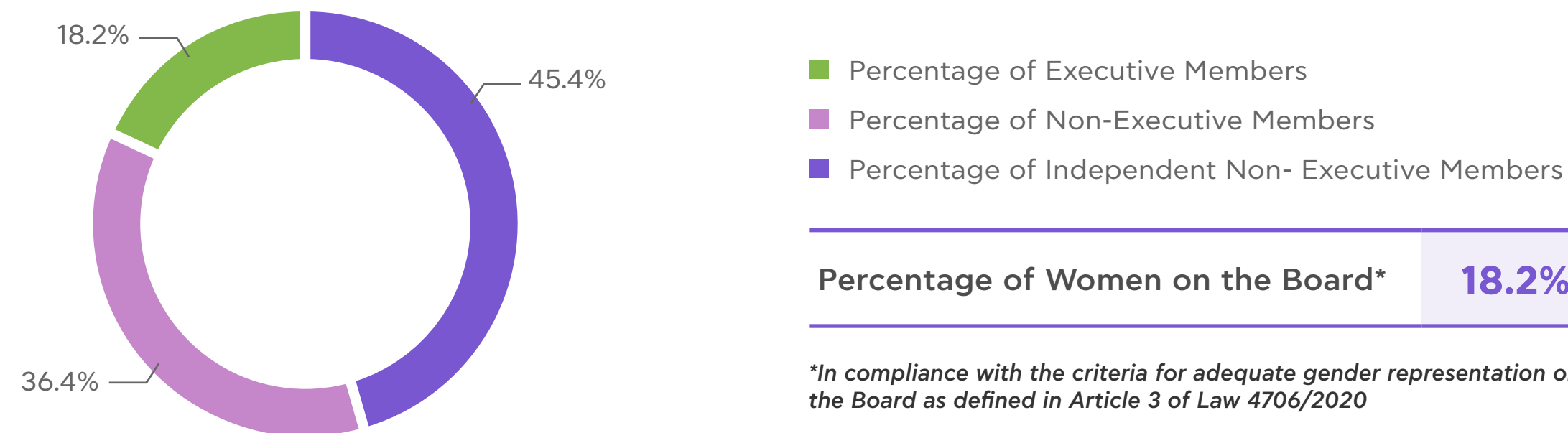
Governance structure

[GRI: 2-9, 2-10, 2-11, 2-12, ATHEX ESG: C-G1]

Board of Directors

The Group's Board of Directors consists of 11 members with a 5-year term, responsible for developing and monitoring the effectiveness of corporate governance principles and ensuring business ethics and compliance.

Konstantinos Halioris	Chairman
Theodoros Kitsos	Vice Chairman, Independent Non-Executive Member
Dimitrios Malamos	CEO, Executive Member
Vasileios Zairopoulos	Non-Executive Member
Christos Siatis	Non-Executive Member
Athanasios Dimiou	Non-Executive Member
Christos-Alexis Komninos	Non-Executive Member
Georgios Samothrakis	Independent Non-Executive Member
Myrto Papathanou	Independent Non-Executive Member
Spyridoula Maltezos	Independent Non-Executive Member
Nikitas Glykas	Independent Non-Executive Member



Committees

All Committees operate under an approved Operating Regulation by the Board.

Audit Committee

Georgios Samothrakis	President, Independent Non-Executive Board Member
Konstantinos Kotsilinis	Member, Non-Board Member-third party
Sofia Manesi	Member, Non-Board Member-third party

Compensation and Nominating Committee

Theodoros Kitsos	President, Independent Non-Executive Board Member
Nikitas Glykas	Member, Independent Non-Executive Board Member
Vasileios Zairopoulos	Member, Non-Executive Board Member

Strategy and Investment Committee

Konstantinos Halioris	President, Executive Board Member
Dimitrios Malamos	Member, Executive Board Member
Vasileios Zairopoulos	Member, Non-Executive Board Member

Sustainability Committee

Theodoros Kitsos	President, Independent Non-Executive Board Member
Konstantinos Halioris	Member, Executive Board Member
Dimitrios Malamos	Member, Executive Board Member
Spyridoula Maltezos	Member, Independent Non-Executive Board Member

Economic value created & distributed

Material Topic

[GRI: 3-3]

COMMITMENT

The Group remains consistently focused on creating value for all stakeholders and is committed to making a positive contribution, both directly and indirectly, to the communities in which it operates. This is achieved through financial discipline, significant investments that support business continuity, and identifying major opportunities, particularly through the principles of the circular economy.

Creation of direct and indirect economic value

[GRI: 203-2]

- The Group seeks to achieve high performance through its business activities, thereby generating and distributing economic value, both directly and indirectly, to the communities in which it operates
- It places special emphasis on strengthening the economies of the countries where it operates through the financial flows it creates for stakeholders
- The Group promotes employment by directly and indirectly creating and maintaining jobs throughout the value chain

Business continuity

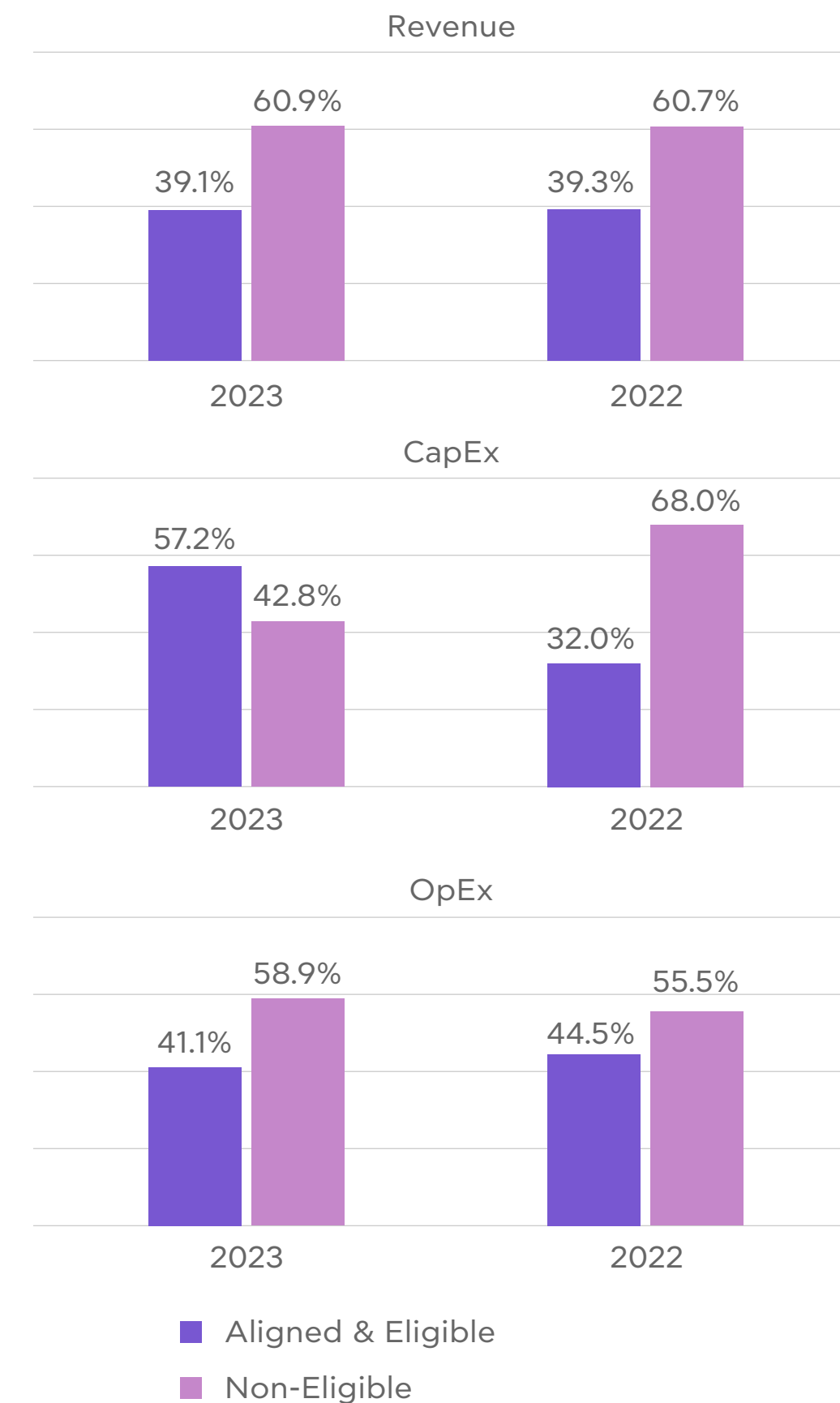
- Achieving steady, sustainable, and recurring profitability, significantly higher compared to pre-pandemic levels, despite the particularly challenging conditions in the global economy.
- Implementing both the planned and the emergency investment plans.
- Continuing the dynamic growth trajectory with the aim of further increasing production volumes, continuously improving the product mix and profitability, and strengthening the recycling capabilities within the framework of holistic sustainable development.

EU Taxonomy reporting

[ATHEX ESG: A-S1]

- In the assessment of the Group's economic activities, the activities classified as eligible under the EU Taxonomy include 3.6 «Production of Other Low-Carbon Technologies» and 1.1 «Manufacture of Plastic Packaging Products.»
- For the environmental objective of adaptation to climate change, activity 3.6 involves the development of technologies aimed at significantly reducing greenhouse gas emissions.
- For the environmental objective of transitioning to a circular economy, activity 1.1 involves the manufacture of plastic packaging products.
- An eligibility assessment of the Group's economic activities was conducted, along with an alignment check of the eligible activities with the technical criteria set out in the Taxonomy Regulation.

Key performance indicators of economic activities

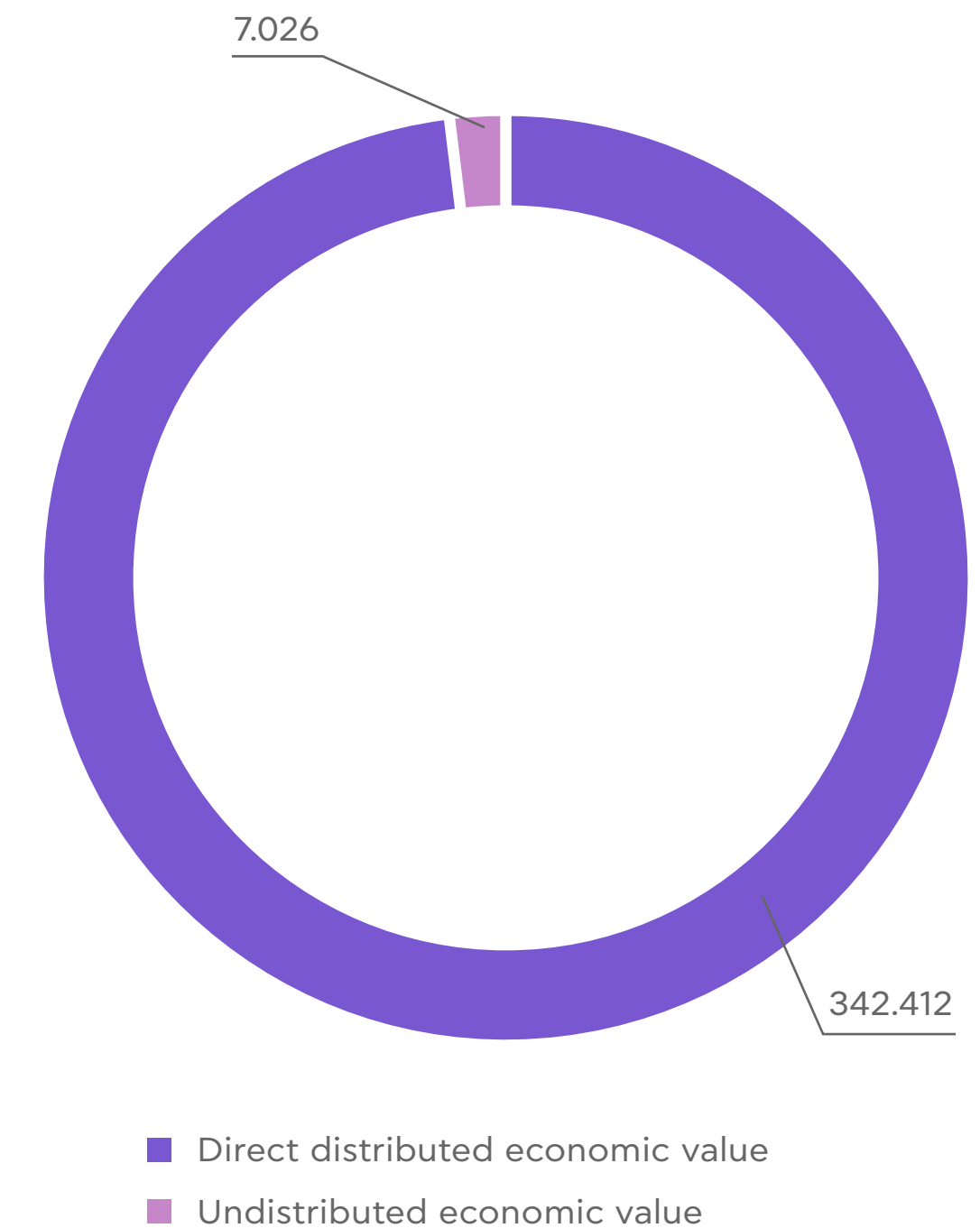


The complete information is included in Table 12 (Appendix)

IMPACT

Direct economic value generated and distributed (in million €)

[GRI: 201-1]



The complete information is included in Table 13 (Appendix)

Business ethics & anti-corruption

Material Topic

[GRI: 3-3]



COMMITMENT

The Group is committed to conducting its activities according to the highest ethical standards and demonstrates zero tolerance for any form of corruption and bribery.

It has established a comprehensive framework of principles, procedures, and policies that ensure transparency and responsible operation based on a robust corporate governance structure.

Anti-fraud policy

- Commitment to conducting all activities according to the highest ethical standards and maintaining zero tolerance for any form of corruption and bribery
- Implementation of the Anti-Fraud Policy
- Annual updates and audits conducted by the Internal Audit Department
- Establishment of disciplinary measures
- Formation of an Audit Committee.

Basic principles of the code of ethics and conduct

[GRI: 2-23, 2-24, 2-27, ATHEX ESG: C-G5]

Business ethics

Respect for human rights

Diversity and equal representation

Compliance with laws and social norms

Product quality

Promotion of fair and free competition

Avoidance of conflicts of interest

Accuracy and completeness of financial information

Protection of corporate assets

Collaboration with public authorities legally and transparently

Conducting all transactions with honesty and anti-corruption efforts

Protection and confidentiality of information

Good labor relations

Safety, health, and environmental protection

Circular economy and climate change

Social contribution

Corporate governance code

the Group, following the approval of the Board of Directors and in compliance with Article 17 of Law 4706/20, implements and adopts the Greek Corporate Governance Code (GCGC, June 2021) of the Greek Council for Corporate Governance (GCCG).

Whistleblowing management

[ATHEX ESG: SS-G1]

- Implementation of the Whistleblowing and Anonymous Reporting Policy
- Utilization of the «EthicsPoint» Reporting Platform, which allows for the reporting of misconduct related to issues of corruption and bribery, non-compliance, human rights violations, or breaches of personal data, in full compliance with Law 4990/2022
- Application of the complaints management procedure for evaluating each report and making decisions on the appropriate follow-up actions

IMPACT

[GRI: 205-3, ATHEX ESG: A-G2]

No reports of corruption or bribery incidents were received through the communication channels maintained by the Group (reporting platform, email, telephone, postal mail, verbal reports), nor was there any indication of related intent or behavior observed by the Group. As a result, no financial damage was incurred.



Regulatory compliance & policies

Material Topic

[GRI: 3-3]



COMMITMENT

The Group is committed to eliminating all forms of forced and compulsory labor, effectively abolishing child labor, and eradicating discrimination in employment and work.

To this end, it is dedicated to full compliance with regulatory frameworks, conducting all business activities with integrity, and maintaining a zero-tolerance policy on human rights issues.



Regulatory compliance policy

It covers all current regulatory requirements with the aim of ensuring effective management of regulatory compliance risks

Internal rules of operation

- Aligned with the requirements of Law 4706/2020
- Approved by a relevant decision of the Board of Directors
- A summary of it is provided on the Group's website

Group policies manual

[GRI: 2-23]

- It forms the foundation of the Group's policies and procedures.
- Its purpose is to establish a unified framework by specifying the minimum control functions that should be followed

Human rights policy

[ATHEX ESG: C-S6]

Commitment to zero tolerance regarding harassment in the workplace and any form of discrimination based on race, religion, gender, nationality, age, disability, sexual orientation, etc., as well as issues of forced and child labor

Policy for the prevention and combatting of violence and harassment in the workplace

Enhancing mechanisms and procedures to prevent and address violence and harassment in the workplace

Ensuring the security of personal data

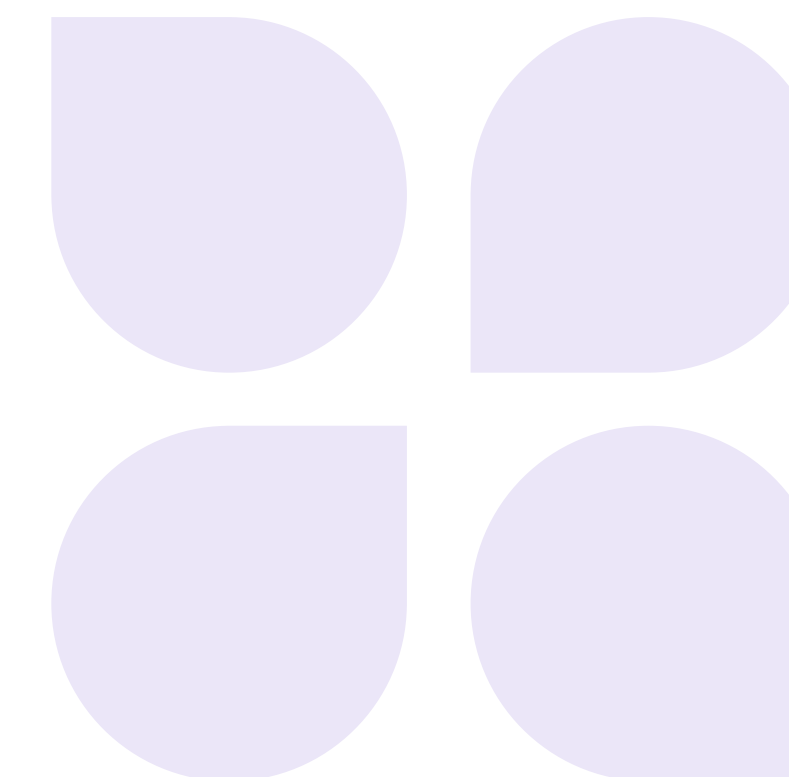
[ATHEX ESG: C-G6, SS-S2]

- Respect for the Privacy of Stakeholders and Maintenance of Confidentiality of Personal Information in Compliance with Relevant Legislation
- Implementation of the General Data Protection Regulation (GDPR) EU 2016/679, as well as Law 4624/2019, which pertain to the protection of individuals regarding the processing of personal data.
- Adherence to the Personal Data Protection Policy, which outlines how personal data is managed and is available on the Group's website.

IMPACT

[ATHEX ESG: SS-S5]

- No confirmed incidents of non-compliance with regulations occurred, and consequently, no financial losses were incurred
- There were no complaints or confirmed incidents of discrimination based on race, religion, gender, nationality, beliefs, age, disability, or other factors, including harassment or human rights violations. Additionally, there were no confirmed incidents or complaints regarding breaches of personal data.



Supply chain issues



COMMITMENT

The Group is committed to fostering a responsible supply chain through mechanisms, policies, and controls, and to mitigating risks related to safeguarding human rights and combating corruption.

Crucial to achieving this goal is meaningful collaboration with suppliers on sustainability-related issues.

Evaluation and selection of suppliers

Supplier evaluation and selection is a crucial business function for ensuring transparency and achieving a responsible supply chain. This involves safeguarding human rights, combating corruption, and meeting environmental goals related to the reduction of indirect greenhouse gas emissions.

According to the Procurement and Accounts Payable Policy and Procedure, the evaluation and selection of suppliers is a distinct and documented process. This process considers objective and consistent criteria such as cost, reliability, quality of provided materials/services, payment terms, delivery speed, potential synergies with other

Group companies or quality control departments (if feasible) and is supported by written evaluations (supplier assessment questionnaires, evaluation matrices with criteria, etc.).

Monitoring supplier performance

[ATHEX ESG: C-S8]

- Supplier selection evaluation is a distinct and documented process
- It considers objective and consistent criteria, such as cost, reliability, quality of supplied materials/services, payment terms, delivery speed, and potential synergies with other Group companies
- It is based on written evaluations, including supplier assessment questionnaires, evaluation tables with criteria, and other related documentation.

Human rights in the supply chain

[ATHEX ESG: C-S6]

- The Group has adopted principles to avoid engaging with suppliers that pose a high risk of human rights violations, even though it is not possible to take measures to identify violations across the entire supply chain.
- Employees of the Group have both the right and the obligation to utilize the platform for submitting anonymous or named reports and to report any potential violations.

IMPACT

Total number of suppliers, total expenses (€ million), and expenses with local suppliers (%)

[GRI: 204-1]

	Suppliers	Expenses	% in local suppliers
Thrace Plastics Co SA	200	3.5	81%
Thrace Nonwovens & Geosynthetics SA	1149	107.2	81%
Thrace Polyfilms SA	562	29.9	65%
Thrace Eurobent SA	133	5.0	71%
Thrace Pack SA	1110	76.2	73%
Thrace Greenhouses SA	321	5.1	97%
Don & Low Ltd	535	50.8	91%
Thrace Synthetic Packaging Ltd	482	14.8	18%
Thrace Ipoma SA	531	19.1	60%
Thrace Greiner Packaging SRL	251	16.7	65%
Lumite Inc	476	16.4	78%
Thrace Polybulk AB & AS	20	17.9	1%
Thrace Plastics Packaging DOO	126	5.4	21%

The complete information is detailed in Table 14 (Appendix).

Detailed data



- Tables of detailed information
- Tables of index publication
- Abbreviation index

Tables of detailed information

Table 1: Solid Waste

Waste Management Method	Total Weight of Hazardous Waste (t)			Percentage		
	2023	2022	2021	2023	2022	2021
Recycling	179.3	205.7	177.8	83.6%	91.9%	81.6%
Energy Recovery	15.2	4.8	18.9	7.1%	2.1%	8.7%
Incineration	19.9	13.4	21.1	9.3%	6.0%	9.7%
Total	214.4	223.9	217.8	100%	100%	100%

Waste Management Method	Total Weight of Non-Hazardous Waste (t)			Percentage		
	2023	2022*	2021	2023	2022	2021
Recycling	3,108.8	3,456.7	2,201.8	67.5%	65.3%	50.5%
Energy Recovery	304.7	314,6	362.4	6.6%	5.9%	8.3%
Landfill Disposal	1,190.8	1,519.9	1,794.9	25.9%	28.7%	41.2%
Total	4,604.3	5,291.2	4,359.1	100%	100%	100%

*Data was updated.

Table 2: Total Weight of Raw Materials (in t)

	2023	2022	2021
Polypropylene	92,800	85,610	90,366
Polyethylene	9,026	10,568	10,856
PET/Polystyrene	421	384	0
Masterbatch (solid additive for coloring or other properties)	3,911	2,908	2,040
Paper	1,662	0	0
Total	107,820	99,470	103,262

Table 3: Total Weight of Recycled Raw Materials (in t)

	2023	2022	2021
Recycled Raw Material*	12,976	13,407	11,443
Percentage of Recycled Raw Material**	10.7%	11.9%	9.4%

*Recycled raw materials are sourced from production residues and external sources.

**Packaging materials are not included in the calculation.

Table 4: Total Weight of Packaging Materials (in t)

	2023	2022	2021
Packaging Materials	7,109	6,938	7,059

Table 5: Energy Consumption by Type and Source (MJ)*

	2023	2022	2021
Non-renewable sources			
Electricity	540,574,273	533,747,676	586,720,878
District Heating	1,317,776	1,545,613	1,627,056
Fuels	107,800,160	104,107,208	115,959,447
Gasoline	1,019,334	947,372	827,330
Natural Gas	96,963,432	90,764,561	103,960,797
Methane	0	0	241,200
LPG	5,647,742	6,781,159	7,112,315
Diesel	2,061,736	1,746,726	1,997,408
Heating Pellets	2,107,916	3,867,390	1,820,397
Total Non-renewable Sources (MJ)	649,692,210	639,400,497	704,307,381
Renewable sources			
Solar Energy (Photovoltaic)	42,507,401	21,243,979	4,148,615
Geothermal Energy**	11,427,874	22,963,889	22,385,650
Hydroelectric Energy	1,258,380	932,976	994,104
Total Renewable Sources (MJ)	55,193,655	45,140,844	27,528,369
Total (MJ)	704,885,865	684,541,341	731,835,750
Total (MWh)	195,802	190,150	203,288

*Conversion factors from the DEFRA methodology guide were used for calculating energy consumption. Data was updated to reflect more accurate information.

**There was a reduced need for heating, hence the decreased consumption.

Energy Consumption by Type and Source (%)

	2023	2022	2021
Electricity (%)	76.7%	78.0%	80.2%
Thermal Energy (%)	0.2%	0.2%	0.2%
Fuels (%)	15.3%	15.2%	15.8%
Renewable Energy Sources (%)	7.8%	6.6%	3.8%
Total	100%	100%	100%

Table 6: Direct and Indirect Emissions

	2023	2022*
Direct Emissions (Scope 1)	5,673	5,265
Indirect Emissions Location-based (Scope 2)	49,405	49,687
Indirect Emissions Market-based (Scope 2)	67,184	59,593
Indirect Emissions Related to the Value Chain (Scope 3)	227,720	235,887
Total	282,798	290,839

*An update of the previous year's data and the method of their conversion was carried out in order to reflect more accurate information.

Table 7: Work Injuries and Illnesses**Work Injuries**

	Employees		
	2023	2022	2021
Number of Work-related Deaths	0	0	0
Number of Recorded Injuries	41	47***	35
Accident Frequency Rate*	2.17	2.45	1.89
Accident Severity Rate**	34.15	30.97	33.53

*Calculated as the number of recorded injuries*200,000/working hours

**Calculated as the number of lost workdays*200,000/working hours

***Data was updated

Work-related Illnesses

	Employees			Partners		
	2023	2022	2021	2023	2022	2021
Number of Deaths from Illness	0	0	0	0	0	0
Number of Confirmed Illnesses	0	0	0	0	0	0

Table 8: Total Number of Employees**Total Number of Employees by Employment Contract**

	2023			2022			2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Permanent	1,519	387	1,906	1,479	366	1,845	1,468	341	1,809
Temporary	117	66	183	132	67	199	224	168	392
Total	1,636	453	2,089	1,611	433	2,044	1,692	509	2,201

Total Number of Employees by Type of Employment

	2023			2022			2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Full-time	1,629	441	2,070	1,606	420	2,026	1,688	496	2,184
Part-time	7	12	19	5	13	18	4	13	17
Total	1,636	453	2,089	1,611	433	2,044	1,692	509	2,201

Table 9: Employee Mobility

	2023	2022	2021
Voluntary Mobility Rate	12%	11%	11%
Involuntary Mobility Rate	9%	8%	10%

Table 10: Women Employees

	2023	2022	2021
Percentage of Women	22%	21%	23%
Percentage of Women in Managerial Positions	17%	16%	18%

Table 11: Employee Training

	2023	2022	2021
Average Training Hours for Men	6.11	5.48	5.53
Average Training Hours for Women	5.82	2.78	3.76
Average Training Hours (Total)	6.04	4.80	5.11

Table 12: Key Performance Indicators

Key Performance Indicators	Turnover		CapEx		OpEx	
	2023	2022	2023	2022	2023	2022
Total (in million €)	345.37	394.38	31.36	37.97	15.77	9.44
Aligned and eligible (in million €)	135.61	154.20	10.03	21.72	7.02	3.89
%	39.3	39.1	32.0	57.2	44.5	41.1
Non-eligible (in million €)	209,76	240,18	21,33	16,25	8,75	5,56
	209.76	240.18	21.33	16.25	8.75	5.56
%	60.7	60.9	68.0	42.8	55.5	58.9

Table 13: Direct economic value generated and distributed (in million €)

	2023	2022	2021
Revenue	349.438	397.148	430.042
Operating Costs	268.594	312.375	287.585
Payroll Expenses	60.181	57.366	58.544
Payments to Financial Institutions	10.627	7.089	6.940
Payments/Contributions to the State	3.010	5.833	11.463
Directly Distributed Economic Value	342.412	382.663	364.532
Undistributed Economic Value	7.026	14.485	65.510

Table 14: Suppliers**Total number of suppliers**

	2023	2022	2021
Thrace Plastics Co SA	200	225	175
Thrace Nonwovens & Geosynthetics SA	1149	1152	999
Thrace Polyfilms SA	562	577	525
Thrace Eurobent SA	133	123	120
Thrace Pack SA	1110	1007	992
Thrace Greenhouses SA	321	288	294
Don & Low Ltd	535	517	534
Thrace Synthetic Packaging Ltd	482	473	319
Thrace Ipoma SA	531	557	549
Thrace Greiner Packaging SRL	251	382	380
Lumite Inc	476	452	436
Thrace Polybulk AB & AS	20	20	20
Thrace Plastics Packaging DOO	126	110	105

Expenses to local suppliers

	2023	2022	2021	2023	2022	2021
Thrace Plastics Co SA	3.5	4.2	3.9	81%	89%	94%
Thrace Nonwovens & Geosynthetics SA	107.2	142.3	113.5	81%	76%	78%
Thrace Polyfilms SA	29.9	35.1	30.4	65%	66%	66%
Thrace Eurobent SA	5.0	7.3	6.8	71%	54%	49%
Thrace Pack SA	76.2	71.2	63.5	73%	79%	81%
Thrace Greenhouses SA	5.1	4.9	4.9	97%	95%	99%
Don & Low Ltd	50.8	59.3	61.9	91%	66%	64%
Thrace Synthetic Packaging Ltd	14.8	14.5	14.2	18%	8%	12%
Thrace Ipoma SA	19.1	22.3	24.8	60%	59%	55%
Thrace Greiner Packaging SRL	16.7	19.0	17.3	65%	33%	25%
Lumite Inc	16.4	22.8	24.8	78%	69%	65%
Thrace Polybulk AB & AS	17.9	20.9	19.0	1%	3%	3%
Thrace Plastics Packaging DOO	5.4	4.1	4.7	21%	23%	23%

"Group companies have other Group companies as suppliers and have been included in the above figures.

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Abbreviation index

ATHEX ESG	ESG reporting guide by the Athens Stock Exchange
BRC (Brand Reputation Compliance)	International standard for food safety
CDP	International non-profitable organization that helps companies publish their environmental impact
EcoVadis	Organization for the evaluation of companies in relation to matters of non-financial updates and responsible business activity
EPD (Environmental Product Declaration)	Environmental Product Declaration
ESG (Environmental, Social and Governance)	The environment, society and corporate governance
EuCertPlus	Certification focusing on the traceability of plastic materials and the quality of the recycled content of the end product
FDA (Food and Drug Administration)	International organization responsible for the protection and promotion of public health
GRI (Global Reporting Initiative)	International reporting standard for sustainable development
IFS (International Food Standard)	International standard for the certification of food safety and quality
In the Loop	Platform for the upcycling of plastic waste
ISO (International Standardization Organization)	International Standardization Organization
LCA (Life Cycle Assessment)	Method for the analysis of life cycle
RecyClass	Certification for the traceability of recycled content in plastic products
SASB (Sustainability Accounting Standards Board)	International reporting standards of sustainable development
SBTi (Science Based Targets initiative)	International initiative that provides companies with a clear methodology for the reduction of emissions according to the goals set in the Paris Agreement
SDGs (Sustainable Development Goals)	Sustainable Development Goals set by the UN
TCFD (Task Force on Climate-Related Financial Disclosures)	International initiative that develops recommendations for more effective disclosures related to the climate change
tCO₂e	Greenhouse gas emissions in tons of CO ₂ equivalent
TUV OK Recycled	Certification scheme that specifies the requirements to calculate the recycled content of plastic products

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