

**GROWING WITH RESPECT**  
TO SOCIETY AND THE ENVIRONMENT

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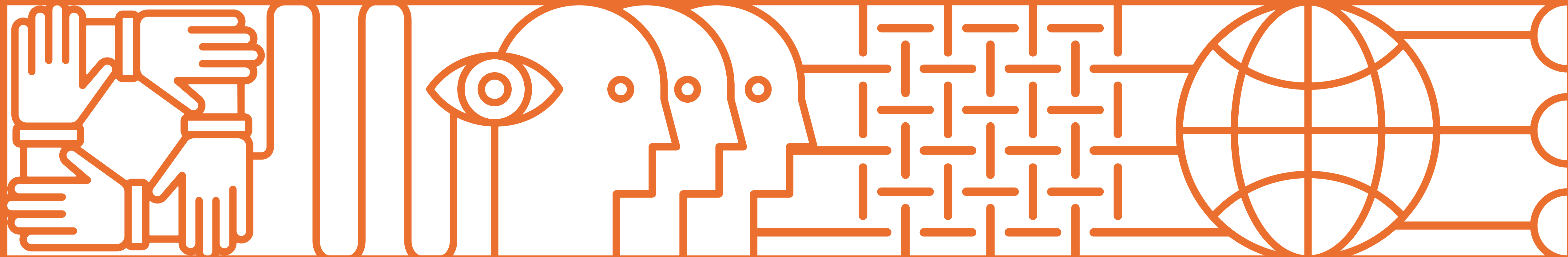
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# INTRODUCTION

- Foreword by the President
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- About the Report





# Foreword by the President

[GRI: 102-10, 102-14]



In an era of multiple crises, in the economy as well as in health, energy and geopolitical stability, businesses are called upon to strengthen their environmental and social footprint.

The main principles of our group philosophy are to manage natural resources properly and responsibly, to respect our people, and to protect the environment.

Our commitment is to remain a responsible partner who respects the needs and expectations of our stakeholders. 2021 delivered a strong financial performance, since the Group managed to increase its profitability.

**In our quest for a sustainable future, we set ambitious goals that are always related to our business model. Sharing this journey with our partners and customers, we are confident that our goals will be achieved.**

Sustainable Development lies at the core of all our business practices.

Konstantinos Halioris





# Foreword by the CEO

[GRI: 102-10, 102-14]



We are prepared for a future business environment filled with challenges, but also great opportunities.

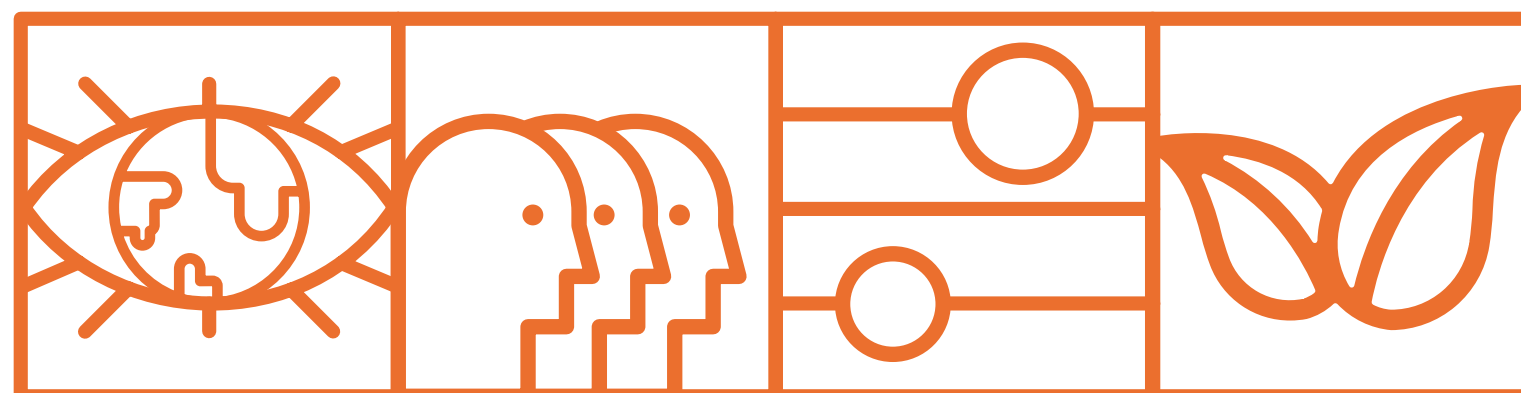
Dimitris Malamos

The year 2021 was a milestone for the Group, as we achieved a high financial performance and a reinforced financial status, while advancing our investment plan.

The strong financial performance of the past two years grants us an opportunity to continuously implement an extensive investment program, exceeding €100 million for the period 2020-2022, while keeping our focus on environmental and social contribution issues.

We are convinced that the Group performance to date has laid the foundations for a significantly higher profitability than the pre-pandemic levels and ensures a trajectory of growth and evolution.

**We remain consistent and committed to our goals, we reinforce our position in the market and we continue to invest in sustainable growth and uninterrupted progress.**





## About the Report

[GRI: 102-45, 102-48, 102-49, 102-50, 102-51, 102-52, 102-53, 102-54, 102-56, ATHEX ESG: A-G5]

The present Report represents the 4th Sustainable Development Report of Thrace Group and refers to the financial year 2021 2021 (01/01/2021-31/12/2021). The Report, which is available on the Group website, describes at length the approach and performance on the material sustainability issues, it is only available in digital form, and it is recommended not to print it. The Report has been composed by the Sustainable Development Division of the Group, with the consultive support of the EY Greece Department of Climate Change and Sustainable Development Services and has not received external ratification. Thrace Group is entirely responsible for the accuracy and inclusiveness of the quantitative and qualitative information included in the Report. Any deviation at the last digit of the quantitative information is due to rounding numbers. By the term "Group" we refer to Thrace Group, and by the term "companies" we refer to the companies of the Group mentioned in the chapter "Domestic and international presence".

The report has been composed in accordance with the GRI Standards: Core option. To provide consistent, thorough, and comparative information, it also includes the respective data from the two previous years. The former Report regarding the financial year 2020 was issued on 13/12/2021. Legitimate standards, disclosure indicators, tools and recommendations of internationally recognized initiatives have been considered, such as SASB, TCFD, CDP, Nasdaq's ESG Reporting Guide. Accordingly, the report takes into account the principles of the United Nations Global Compact (UNGC), the ESG Reporting Guide of the Athens Stock Exchange (2022), as well as the impact on the UN Sustainable Development Goals (SDGs). Moreover, the Group is included in the ESG ATHEX index of the Athens Stock Exchange. Full information on the indicators used can be found in Appendix 5: ESG data tables, while all abbreviations are explained in Appendix 6: Abbreviation list.

\*This report has been prepared in accordance with the GRI Standards: Core option.

## Sustainable Development is a "polymer" collaboration for the Group, residing at the core of its strategy and culture.

Through its sustainable development strategy the Group aims to create value for society and the environment. This can only be achieved through collective cooperation.

All executives, factory employees overseeing products' design and manufacture, suppliers and customers of the Group recognize the essence and importance of Sustainable Development for both their everyday life and for the economy, environment and society overall.

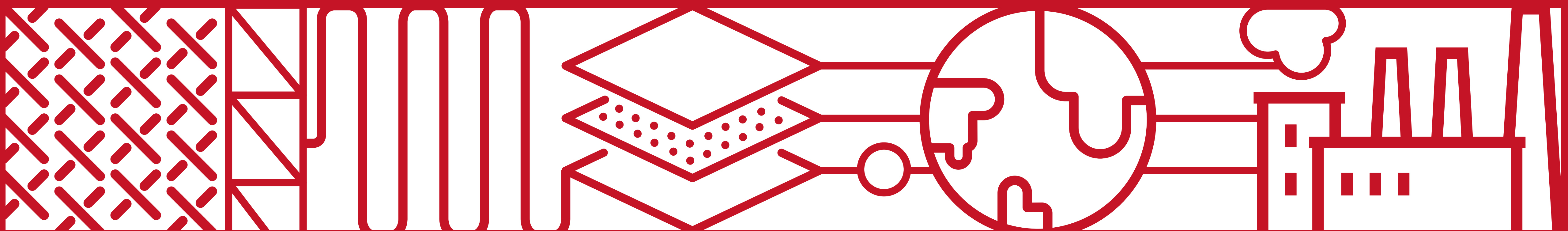
This concept is woven directly in the corporate culture and mindset of the Group and ensures its business continuity.



For more information, please contact the Sustainable Development Department of Thrace Group.

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# THE GROUP

2021 in numbers

Vision, mission and values

Domestic and international presence

History

Business sectors

Participations in initiatives, awards and certifications





## 2021 in numbers

[GRI: 102-6, 102-7]



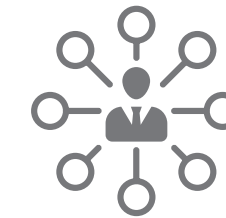
Activity in  
**3 sectors**  
Technical Fabrics  
Packaging Solutions  
Hydroponic Agriculture



Meeting the demands of  
**25 market segments**  
with products and solutions



Group human resources  
**2200 employees**  
Including joint ventures



Sales network in  
**80 countries**  
worldwide



Production capacity for  
**28 different technologies**



Operations in  
**9 countries**  
with production, trading  
and distribution companies



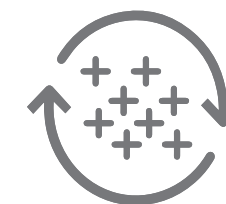
The Group comprises of  
**14 companies**  
worldwide



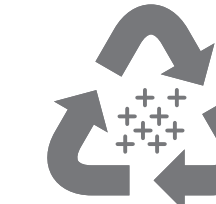
Group net sales  
**€ 428 mil.**



Processing more than  
**110,000 MT**  
PP/PE per year



Pledge to replace  
**8,500 MT**  
of virgin raw material  
with recycled plastic  
by 2025



Use of recycled polypropylene  
**11,443 MT**  
from production process  
residues and external  
sources

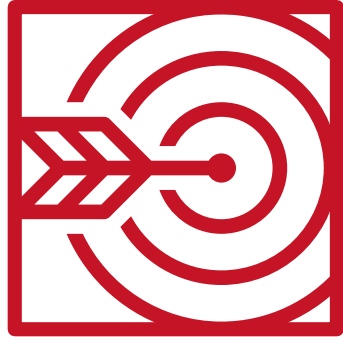


Application for  
**120 product groups**  
supporting circular  
economy



Member of  
Circular Plastic  
Alliance





# Vision, mission and values

[GRI: 102-16, ATHEX ESG: A-G1]

## VISION

**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.**



## MISSION

Adhering closely to our Group core values

Investing in our people, by encouraging **lifelong learning, individuality, personal initiatives, and self-achievement.**

Creating new business standards **through innovation and smart thinking**, aiding our customers' leadership in their markets.

Providing not just products but **complete & innovative solutions**, tailor-made upon our customers' specific requirements and needs.

Acting **local – being global**, serving thousands of companies worldwide through strategic geographic dispersion.

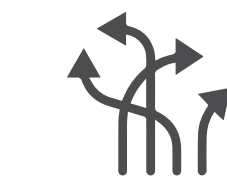
Pursuing profitability through **organic growth and strategic acquisitions.**

Achieving competitive prices through **economies of scale, vertical integration, and internal synergies.**

Combining diverse high-end technologies **with a long know-how and an extensive experience** in the markets we operate.

**Respecting our global environment and the societies** where we work and live.

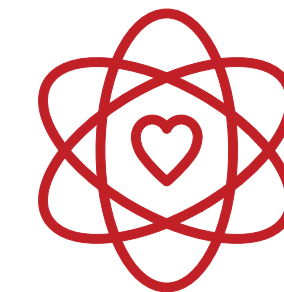
**Adapting** to the ever-changing market environment and promptly adjusting our practices to successfully meet the global trends that will shape **the future of business, economy, and society.**



Flexibility



Responsiveness



**Our Values**



Integrity



Innovation



Collaboration



Leadership



Effectiveness



## Domestic and international presence

[GRI: 102-1, 102-3, 102-4, 102-5, 102-7, 102-45]



Thrace Group consists of the following companies, which have an active trading or production status\*:

<b>Thrace Plastics Co S.A.</b>	Xanthi, Greece
<b>Thrace Nonwovens &amp; Geosynthetics S.A.</b>	Xanthi, Greece
<b>Thrace Polyfilms S.A.</b>	Xanthi, Greece
<b>Thrace Eurobent S.A.</b>	Xanthi, Greece
<b>Thrace Plastics Pack S.A.</b>	Ioannina/Xanthi, Greece
<b>Thrace Greenhouses S.A.</b>	Xanthi, Greece
<b>Don &amp; Low Ltd</b>	Forfar, Scotland
<b>Thrace Synthetic Packaging Ltd</b>	Clara, Ireland
<b>Thrace Ipoma SA</b>	Sofia, Bulgaria
<b>Thrace Greiner Packaging SRL</b>	Sibiu, Romania
<b>Lumite Inc</b>	Georgia, USA
<b>Thrace Polybulk AB</b>	Köping, Sweden
<b>Thrace Polybulk AS</b>	Brevik, Norway
<b>Thrace Plastics Packaging DOO</b>	Nova Pazova, Serbia

\*The companies Thrace Eurobent S.A., Thrace Greenhouses S.A., Thrace Greiner Packaging SRL and Lumite Inc. are joint ventures of Thrace Group; however, all four are included in their entirety (100%) in this Report, as they are applying the Sustainable Development principles and values of the Group.



# History

[GRI: 102-2, 102-4, 102-5, 102-6, 102-10]



**1977**

Stavros Halioris establishes **Thrace Plastics S.A.** in Xanthi.



**1980**

New production lines for woven sacks, ropes and twines in Xanthi.



**1986**

New production line for technical fabrics in Xanthi.



**1992**

New production line for industrial and carpet yarns in Xanthi.



**1995**

Enlistment in the Athens Stock Exchange.



**1997**

Establishment of **Thrace Pack S.A.** (Ioannina, Greece) with a new production line for rigid packaging.



**2000**

Acquisition of **Don & Low Ltd** (Scotland) and operation of a nonwovens production line.



**2001**

Acquisition of **Thrace Polybulk AB & AS** (Norway, Sweden) and operation of a production line for flexible big bags.



**2002 - 2004**

Acquisition of **Thrace Greiner** (joint venture by 50%, Romania) and **Thrace Ipoma** (Bulgaria).



**2005**

Establishment of **Thrace Plastics Pack DOO** (Serbia).



**2006 - 2007**

Acquisition of **Lumite Inc.** (joint venture by 50%, USA) and **Thrace Linq Inc.** (USA).



**2008**

Two new production lines for spunbond and needle-punched nonwoven fabrics in Xanthi.



**2009**

New production line for nonwoven needle-punched fabrics in the US.



**2010**

Establishment of **Thrace Nonwovens & Geosynthetics S.A.** (Xanthi, Greece) which assumes all the activities of Thrace Plastics related to technical fabrics. Establishment of **Thrace Polyfilms S.A.** (Xanthi, Greece).



**2012**

Establishment of a new trading company in China to penetrate the Asian market.



**2013**

Establishment of **Thrace Greenhouses S.A.**, specialising in hydroponic cultivation with the use of geothermal energy.



**2014**

Establishment of **Thrace Eurobent S.A.** (joint venture by 51%, Xanthi, Greece) and operation of a production line for waterproofing products with Geosynthetic Clay Liners (GCL).



**2016**

Two new production lines for spunbond and needle-punched nonwoven fabrics established in Xanthi, and one new production line established in Bulgaria.



**2017**

As a result of internal restructuring, Thrace Plastics SA becomes Thrace Plastics Co SA. Establishment of **Thrace Synthetic Packaging Ltd** (Ireland) and of a new injection production line.



**2018**

New production line for needle-punched nonwoven fabrics established in the US. Thrace Greenhouses expands by 11 acres, reaching a total of 46 acres.



**2019**

Internal restructuring of the Group to focus on the development of new innovative and sustainable products while limiting operations in low profit margin markets and products.



**2020**

New production lines for needle-punched nonwoven fabrics, meltblown fabrics and surgical masks in Greece, Scotland and Ireland.



**2021**

First phase of solar panel installation (net metering) is completed.



# Business Units

[GRI: 102-2, 102-4, 102-6, ATHEX ESG: A-G1]

## TECHNICAL FABRICS



## PACKAGING SOLUTIONS



## HYDROPONIC GREENHOUSES



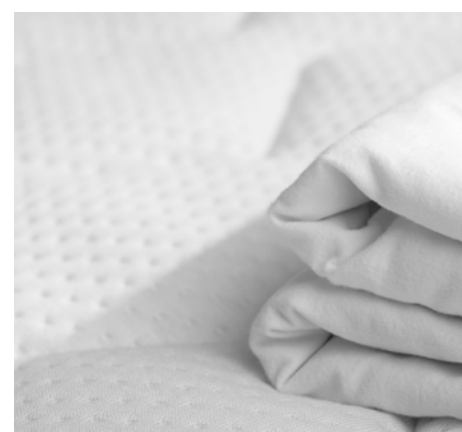


## Technical Fabrics Business Unit

**The technical fabrics' business unit involves the production and trading of synthetic fabrics for industrial and technical uses. It focuses on the international market and operates through 6 Group companies.**

### Product Categories:

- Geotextiles
- Construction materials
- Agri / Horticulture / Aquaculture products
- Landscape / Gardening products
- Sport & Leisure products
- Medical / Hygiene products
- Filtration materials
- Furniture & Bedding materials
- Automotive industry materials
- Packaging fabrics
- Advanced fabrics / Composites
- Floor covering materials
- Industrial fabrics
- Webbing / Ropes
- Industrial Yarns & Fibres



**THRACE NG**

GREECE

**THRACE eurobent**

**Don & Low**  
MEMBER OF THRACE GROUP

SCOTLAND

**THRACE SYNTHETIC**

IRELAND

**THRACE POLYBULK**

NORWAY & SWEDEN

**Lumite**

USA

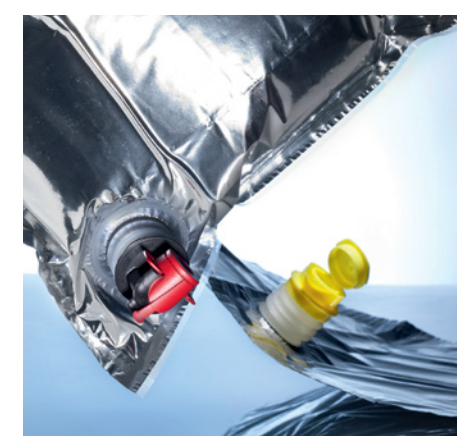


## Packaging Solutions Business Unit

The packaging business unit involves the production and trading of food packaging and industrial products, it primarily targets the European market and operates through 6 Group companies.

### Product Categories:

- FIBC / Filling Solutions
- Bags / FFS Films (Form, Fill, Seal)
- Pallet Covering / Packaging Film
- Container Liners / Cargo Protection
- Packaging Fabrics
- Injection Buckets /Pails /Containers
- Thermoforming Cups
- Crates
- Bag in Box
- Garbage Bags
- Ropes & Twines



**THRACE PACK**

GREECE & SERBIA

**THRACE POLYFILMS**

GREECE

**THRACE IPOMA**

BULGARIA

**THRACE greiner packaging**

ROMANIA

**THRACE SYNTHETIC**

IRELAND



# Hydroponic Greenhouses using Geothermal Energy

**Operating since 2013 with full respect to the environment and the consumer, Thrace Greenhouses is cultivating pure and delicious hydroponic vegetables on 46 acres of land in Xanthi, using geothermal energy, solar power and minimum to zero plant protection products.**

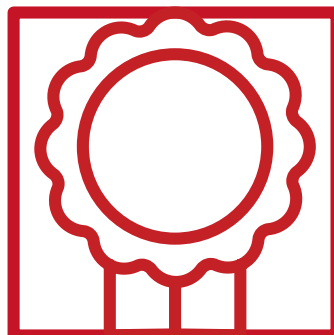
The vision of Thrace Greenhouses is to ensure “a systematic and organized business activity in the primary sector, aiming at an optimal production with minimum environmental footprint”.



Thrace Greenhouses



FRESH HYDROPONIC VEGETABLES



## Participation in initiatives, awards and certifications

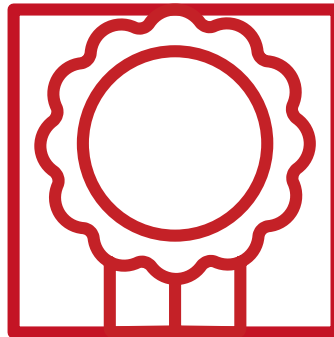
[GRI: 102-12, 102-13]

### PARTICIPATIONS

	<p><b>EDANA</b>, the international link for nonwovens and related industries.</p>		<p>The Association of Hellenic Plastic Industries (<b>ΑΗΡΙ – ΣΒΠΕ</b>) operating in the field of plastic applications.</p>		<p>The Synthetic Turf Council (<b>STC</b>), a non-profitable commercial union that promotes, develops and supports the industry of synthetic turf.</p>
	<p>The European Man-Made Fibres Association (<b>CIRFS</b>) which is the representative body for the man-made fibre industry in Europe.</p>		<p>The Polyolefin Circular Economy Platform (<b>PCEP</b>) organization, which aims at redesigning and recycling packaging products and materials.</p>		<p>The <b>Circular Plastics Alliance</b> initiative which commits to use 10 million tons of recycled plastic for the creation of new products, in the EU by 2025.</p>
	<p>The Association of Greek Manufacturers of Packaging &amp; Materials (<b>AGMPM – ΣΥΒΙΠΥΣ</b>), active in the packaging production industry.</p>		<p>The European Association of Geosynthetic product Manufacturers (<b>EAGM</b>), which aims at promoting the knowledge and usage of European synthetic products.</p>		<p>The international organization <b>CDP</b> which supports and evaluates companies on their environmental impacts.</p>











## Participation in initiatives, awards and certifications

[GRI: 102-12, 102-13]

### AWARDS

	<p>The Group was honored with the Openness Award in the Growth Awards ceremony organized by Eurobank and Grant Thornton.</p>
	<p>Thrace Pack received a bronze award for "Innovation and New Technologies" in the "Smart Factory" category of the Manufacturing Excellence Awards.</p>
	<p>Thrace Pack was distinguished for its good practices in health and safety matters at the Health &amp; Safety Awards held at the Stavros Niarchos Foundation.</p>
	<p>The companies Thrace Pack and Thrace Greiner Packaging received a silver distinction by EcoVadis during their evaluation, while Thrace Polybulk earned the Eco-Lighthouse certification for its sustainable environmental practices.</p>

### CERTIFICATIONS

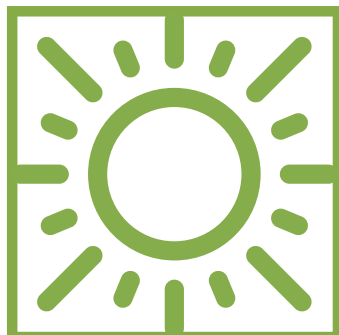
<p><b>ISO 14001:2015</b></p>	<p>Environmental management system</p>
<p><b>ISO 45001:2018</b></p>	<p>Occupational health and safety system</p>
<p><b>ISO 50001:2018</b></p>	<p>Energy management system</p>
<p><b>ISO 9001:2015</b></p>	<p>Quality management system</p>
<p><b>ISO 13485:2016</b></p>	<p>Quality management system for medical devices</p>
<p><b>ISO 22000:2018</b></p>	<p>Food safety management system</p>
<p><b>BRC, IFS, FDA, HALAL</b></p>	<p>Certification for food quality and safety</p>
<p><b>Global GAP</b></p>	<p>Certification for the implementation of good agricultural practices</p>
<p><b>EuCertPlass</b></p>	<p>Certification for the recycling of secondary raw material</p>
<p><b>Recyclclass</b></p>	<p>Certification for recycled raw material content</p>
<p><b>OK Recycled</b></p>	<p>Certification for the calculation of recycled content</p>
<p><b>CoVid Shield</b></p>	<p>Certification for health and safety</p>
<p><b>Oeko-Tex® Standard 100</b></p>	<p>Certification for textile products</p>



# SUSTAINABLE DEVELOPMENT

Approach  
 Strategy  
 Material Topics





## Approach

[ATHEX ESG: C-G4]

Through sustainable development the Group aims at creating value for society and the environment.

**Among its priorities is to manufacture sustainable products aligned with the circular economy standards, to increase the use of recycled raw materials, to invest in renewable energy sources and to plan specific actions which help further reduce the environmental footprint.**

Building trust among all interested parties is of major importance, and a comprehensive framework of principles has been adopted to ensure transparency and responsible operation. Top priorities include the health and safety of employees along with product quality. An important contribution to communities is also brought forward by the “Stavros Halioris” Social Centre. The Group implements a specific policy and strategy regarding sustainable development and is committed to respecting humans, society and the environment, to remain a reliable social partner.

## OUR PRINCIPLES



### ENVIRONMENT

Reduce direct and indirect emissions

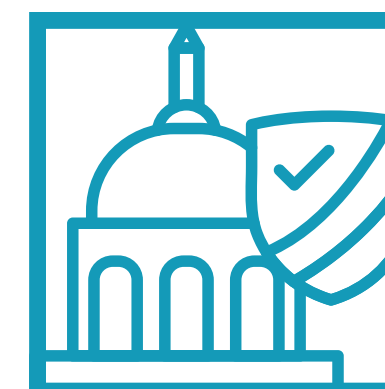
Support the circular economy model



### SOCIAL

Create value for stakeholders

Contribute to society



### GOVERNANCE

Operate with transparency and integrity

Ensure business continuity



# Strategy

[ATHEX ESG: A-G3]

Goals	Actions
<b>1. Reduce greenhouse gas emissions in all processes</b>	Our priority is to constantly increase the use of recycled raw material, reduce residues from production processes, reduce energy consumption, invest in renewable energy sources and reduce waste.
<b>2. Improve product environmental impact</b>	Our priority is to optimize product design, reduce average weight and develop new reusable solutions.
<b>3. Implement circular economy projects</b>	Our priority is to strengthen the collaboration with existing and new partners through circular economy initiatives, and to reduce the environmental impact of the supply chain.
<b>4. Improve social aspects affecting stakeholders</b>	Our priority is to establish a framework of cooperation with suppliers based on environmental and social criteria, develop an ESG manual, ensure the continuous development and training of employees and guarantee their health and safety, and to support local communities.
<b>5. Ensure a responsible corporate governance</b>	Our priority is to organize seminars on sustainable development topics, to educate on the directives of the corporate governance legislation ensuring their correct application, and to incorporate best practices.
<b>6. Create awareness and obtain certifications and disclosures</b>	Our priority is to reinforce the communication strategy on sustainability, research the life cycle and environmental footprint of each product group, obtain relevant certifications, and participate in international benchmark initiatives.

## POLICY

[ATHEX ESG: C-G2, C-G4]

The Group has adapted and abides by an integrated set of principles and policies which ensure transparency and responsible operation. In this framework, it seeks to implement practices that are promoting sustainable development and is committed to respecting the human aspect, society and the environment, in order to remain a reliable social partner. The Sustainable Development Policy implementation is monitored by the Sustainability Committee of the Board of Directors, while the administration is brought forward by the Sustainable Development Department. The Sustainable Development Policy was approved by decision of the Board of Directors in 2021, is annually reviewed and can be found on the Group website.

## MONITORING

[GRI: 102-18, ATHEX ESG: C-G2]

The Sustainability Committee is composed of executive and non-executive members of the Board of Directors and its primary goal, according to its Terms of Reference, is to research, pre-approve and present to the Board of Directors the recommended strategy, management and monitoring of environmental performance and social sustainability. The Sustainable Development Department updates the Committee on matters of sustainable development that need to be discussed, to define priorities, respective goals and time plans and monitor their implementation progress. It is responsibility of the Sustainability Committee to then inform the other members of the Board of Directors. The Sustainable Development Department is committed to implementing actions and initiatives that promote sustainable development and create value for stakeholders, the market and society, following the Sustainable Development strategy established by the Group. Its main responsibilities are described in the Internal Rules of Procedure.



## Material Topics

[GRI: 102-42, 102-43, 102-49, ATHEX ESG: C-G3]

The establishment of dialogue with stakeholders is of great importance to the Group, as it contributes to its more effective operation, the comprehension of market circumstances and the mitigation of any risks. The Group recognizes as its stakeholders all those significantly affected by its activities and vice versa. Within this framework, the Group maps the stakeholder groups, the decisions of which affect its ability to apply its strategy and achieve its goals and, on an annual basis, validates and prioritizes them, while monitoring and improving the methods of communication and consultation with them. At the same time, it records the basic needs and expectations of stakeholders, which are communicated to the Board of Directors so that decisions can be taken accordingly.

**By the end of 2020, the Group identified important topics related to the creation of financial, social and environmental benefits throughout the value chain. The Group then prioritized these topics in relation to its business model, based on the methodology of the internationally recognized GRI standards.**

Detailed information on the methodology followed will be found in Appendix 2, 3 and 4.

Furthermore, the rest of the topics that have been identified as important in relation to the Group, its activities and stakeholders, are being monitored on an ongoing basis and are also mentioned in the present Report. Namely, these topics are:

- Improvement of energy efficiency
- Identification of financial and operational risks and opportunities deriving from climate change

## ENVIRONMENTAL TOPICS & CLIMATE CHANGE

- Provision of innovative and sustainable products within the framework of circular economy
- Waste reduction and maximization of reprocessing and recycling opportunities
- Reduction of greenhouse gas emissions

## SOCIAL & WORK-RELATED TOPICS

- Creation and safeguarding of employment
- Defense of human rights at work
- Assurance of the health, safety and well-being of employees
- Assurance of product quality and customer health and safety

## CORPORATE GOVERNANCE & RESPONSIBLE ENTREPRENEURSHIP TOPICS

- Creation of economic value and economic performance of the Group
- Responsible corporate governance and assurance of business ethics and compliance
- Assurance of business continuity and preparedness for emergency response

- Reduction of water consumption
- Protection and conservation of biodiversity
- Promotion of data transparency about products and customer information
- Continuous employee training and development
- Support of the local community and maintenance of active participation and collaboration
- Assessment of suppliers in terms of their social and environmental performance



# Material Topics

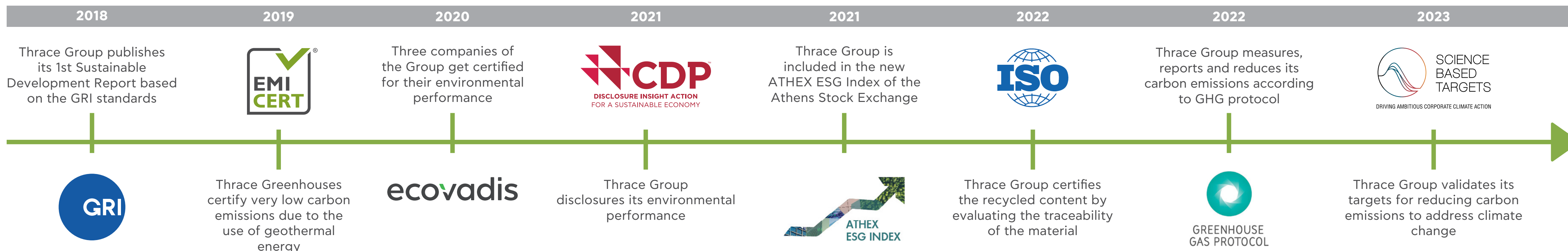
[GRI: 102-42, 102-43, 102-49, ATHEX ESG: C-G3]

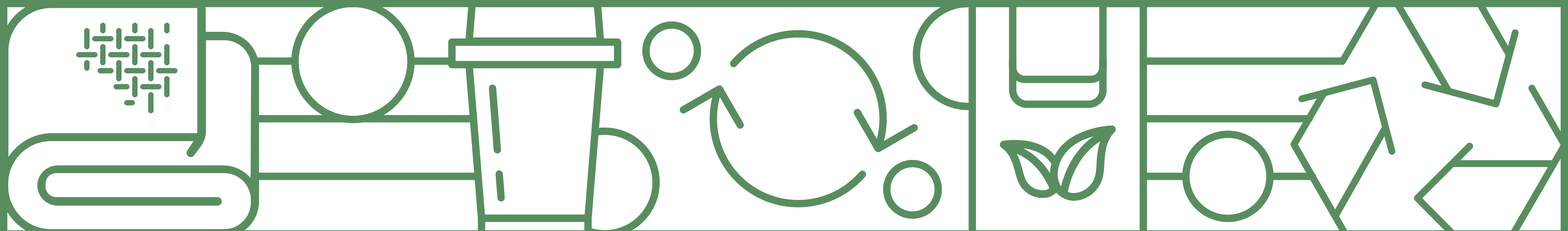
## THE GROUP FOCUSES ON 11 OF THE 17 SUSTAINABLE DEVELOPMENT GOALS

These goals are key areas in which the Group contributes positively and monitors their progress and contribution for their achievement:



## THE GROUP MAKES SURE THAT IT IS CONSTANTLY HAROMINIZED WITH THE MOST IMPORTANT INITIATIVES FOR SUSTAINABLE DEVELOPMENT





# ENVIRONMENTAL TOPICS & CLIMATE CHANGE

Provision of innovative and sustainable products within the framework of circular economy

Waste reduction and maximization of reprocessing and recycling opportunities

Circular economy platform IN THE LOOP

Reduction of greenhouse gas emissions





# Provision of innovative and sustainable products within the framework of circular economy

[Material topic]

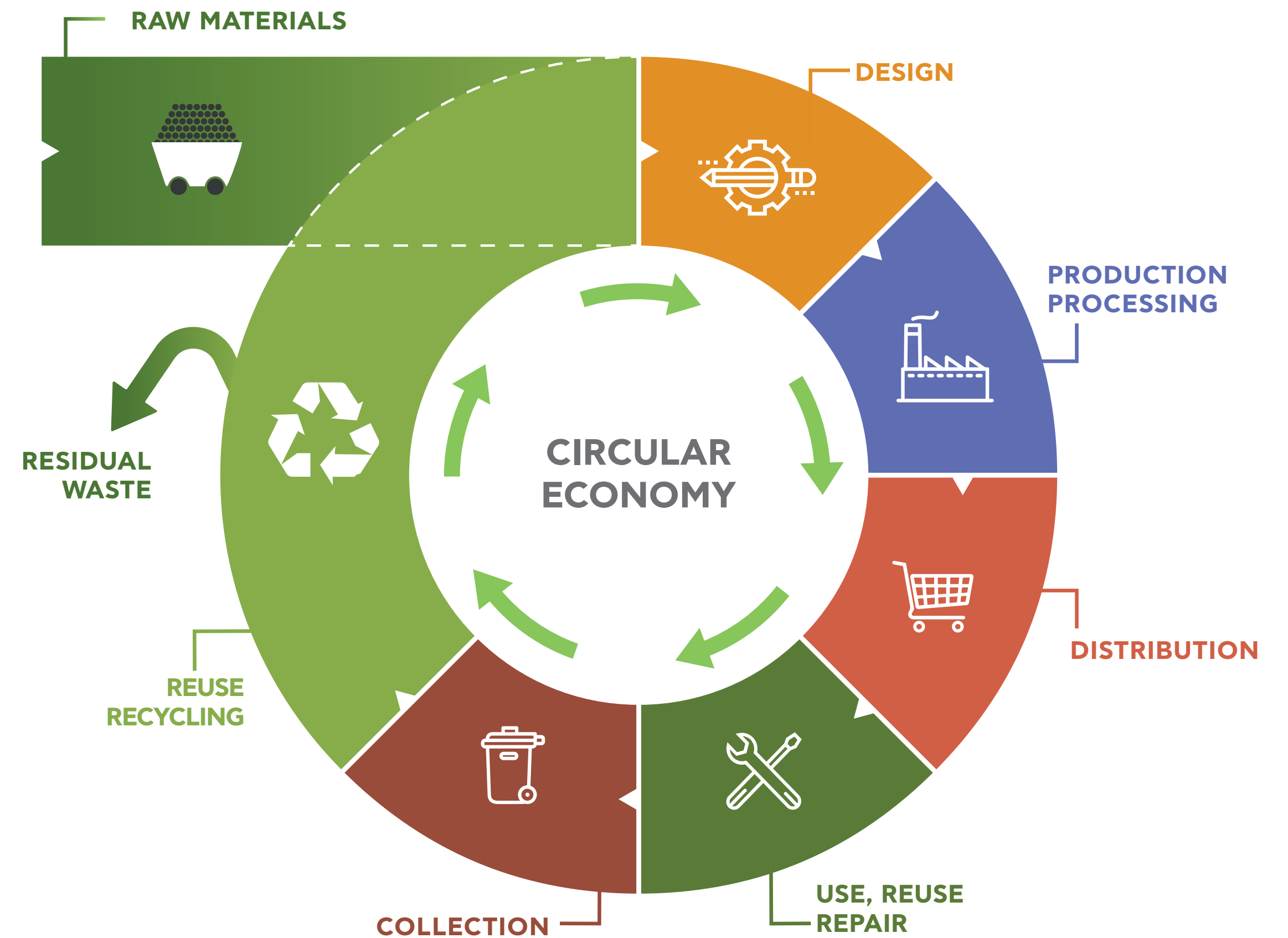


## Approach

[GRI: 103-2, SASB: RT0204-09, RT0204-12, ATHEX ESG: A-G1, SS-E5, SS-E7]

The European Green Deal lays the foundations for a new plastics economy, within which the design and production of plastic products fully respect the environment by utilizing fewer natural resources and intensifying recycling practices.

The Group is fully aligned with this strategy by turning today's challenges into opportunities for growth, aspiring to foster a sustainable competitive advantage. Within this framework, it has adopted the principles of circular economy throughout the life cycle of its products.







## Provision of innovative and sustainable products within the framework of circular economy

[Material topic]



### RAW MATERIALS

- Assurance of quality, safety and sustainability regarding the use of natural resources upon the stage of selection and supply of raw materials
- Evaluation of raw materials based on the required technical specifications
- Restraint in using 27 critical raw materials during the production process, them being identified by the EU as of high risk for future supply



### DESIGN

- Product Life Cycle Assessment (LCA) and development of Environmental Product Declarations (EPD) in accordance with international standards
- Focus on research and development for reusable products
- Design of new innovative and sustainable products with low environmental footprint



### PRODUCTION

- Saving on raw materials through the reuse of internal waste
- Investment in more energy-efficient production machines
- Continuous monitoring of energy consumption per kilogram of product output
- Combining state-of-the-art technologies from processing to finishing, and taking advantage of vertical integration to increase the use of recycled raw material in different products with different technical specifications



### DISTRIBUTION / TRANSPORTATION

- Synergies among the companies of the Group to optimize itineraries and make the most of the payload in transports.
- Supply of raw materials by industries located in the same or nearby geographic area, when possible.
- Collaboration with customers to reduce the use of secondary packaging, such as replacing wooden pallets with reusable plastic ones and cardboard boxes with reusable plastic pallet boxes



## Provision of innovative and sustainable products within the framework of circular economy

[Material topic]



### REUSE

- Design and manufacturing of products with the longest possible life cycle, so that they can be reused and reprocessed over a long period of time



### COLLECTION

- Proper separation at source and storage of production residues in special temporary storage stations, aiming at their optimum utilization



### RECYCLING

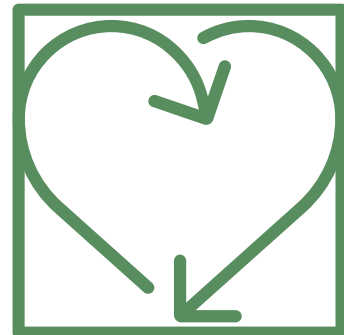
- Commitment to replace 8,500 tons of primary raw material with recycled plastic by 2025, taking EU voluntary pledge to increase the use of recycled plastic
- Reliable information on traceability and content of recycled raw material through the RecyClass, EuCertPlus and TUV OK Recycled certifications
- Recycling of non-reusable raw materials through licensed partners



### DISPOSAL

- Continuous decrease in the disposal of non-hazardous waste in landfills, by separating at source





## Provision of innovative and sustainable products within the framework of circular economy

[Material topic]

The Group continuously invests in Research and Innovation with a focus on the design phase, aiming to develop sustainable products which are fully in line with the European strategy for plastics in a circular economy, to have a positive environmental impact and to help mitigate climate change.

**The priorities at the design stage include a low environmental footprint, lowest possible weight ensuring same durability, potential for reusability, 100% recyclability, production from a single material, a maximum of 30% natural materials in products, and the use of recycled material to ideally reaching 100%.**

Plenty Group products replace raw material with recycled one while maintaining their technical properties, and are being certified by RecyClass, an international initiative that promotes the recyclability of plastic packaging and ensures the traceability and transparency of recycled plastic.

The Group has carried out EPD® (Environmental Product Declaration) environmental assessments for representative types of products in all three areas of its business activity. Both the assessments and the corresponding Life Cycle Assessments (LCA) followed an internationally established methodology for the product categories in question (e.g. ISO 14025 & ISO 14040). Their validity was further certified by an independent auditor, and they are available in the International EPD System database of EPD International AB (based in Sweden).



## Performance

[GRI 103-3, 301-1]

Raw materials in 2021

**109,925 tn**

111,804 tn in 2020

Change 2020/2021

**-1.7%**

0.9% 2019/2020

Detailed information included in Table 1 (Appendix 1: Info tables)

[GRI 103-3, 301-2]

Recycled raw material\* in 2021

**11,443 tn**

6,783 tn in 2020

Change 2020/2021

**68.7%**

8.4% 2019/2020

\*deriving from residues of internal production processes and from external sources

Detailed information is included in Table 2 (Appendix 1: Info tables)



## Protection of biodiversity

### PROTECTION AND CONSERVATION OF BIODIVERSITY

[ATHEX ESG: A-E5]

The Group seeks to increase the use of recycled raw material, to drastically reduce waste and greenhouse gas emissions from production processes, thereby reducing pressures on biodiversity. Following a circular economy strategy, its goal is to engage materials in the economy cycle as much as possible, through reuse or recycling, and keep them away from environment, landfills and oceans, thus mitigating negative impacts on biodiversity throughout the value chain.

The biodiversity approach works alongside the new European “Farm to Fork” strategy supporting the transition to a fully sustainable agriculture. The Group, through Thrace Greenhouses, strongly endorses this strategy for healthier, fresher and more sustainable food.

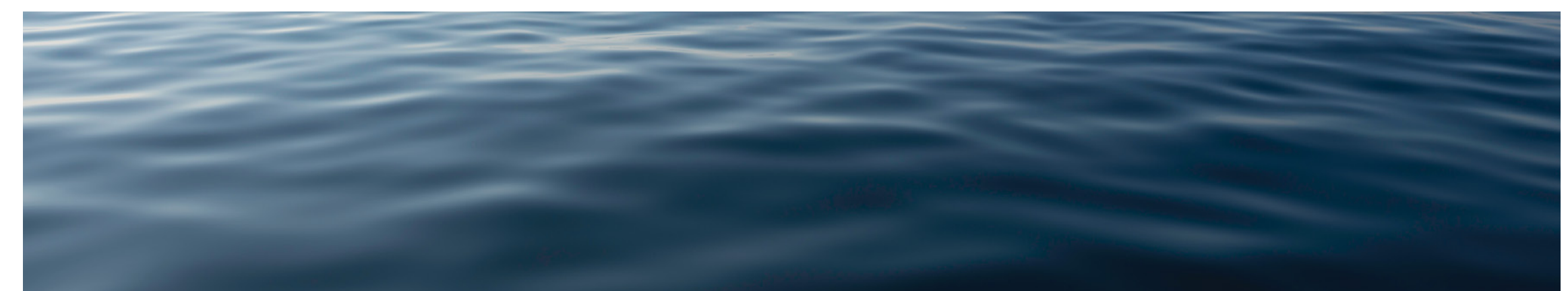
Hydroponics allows the minimal use of plant protection products, with the ultimate goal to eliminate them and increase water savings, while geothermal energy contributes to energy savings and almost zero greenhouse gas emissions.

### REDUCTION IN WATER CONSUMPTION

[ATHEX ESG: SS-E4]

To save in water, ensure its rational use and limit leaks, several measures are being taken:

- **Water consumption monitoring**
- **Integrated proactive maintenance system to deal with possible leaks (cooling/heating)**
- **Water collection and recycling systems**
- **Automatic switches at drinking water points**
- **Special marking for thoughtful use of drinking water**





# Reduction of waste and maximization of reprocessing and recycling opportunities

[Material topic]

## Approach

[GRI: 103-2, 306-1, 306-2]



### SOLID WASTE

The Group fully complies with the legal requirements on waste management, while adhering to contractual obligations such as registering in the Electronic Waste Registry (HMA) and listing its annual waste report, registering in the National Registry of Waste Producers (EMPA) and paying the respective packaging recycling fee. In addition to following specific internal procedures, such as reporting on the type and quantity of generated waste, the Group constantly seeks to reduce waste through separation in individual flows. It is also ensured that the companies which treat the Group's waste have valid legal operating documents, and issue respective recycling certificates. Furthermore, the Group systematically monitors the produced non-hazardous liquid waste (sewage) and ensures its safe management.

### USE OF CHEMICALS

[ATHEX ESG: SS-E8, SASB: RT0204-09]

Use of chemicals is imposed by the type of industry, so the management of potential environmental risks becomes an important priority. The Group fully complies with the legal requirements for the temporary storage and use of chemicals, it educates and trains employees on the safe handling of these substances and does not use chemicals or other hazardous substances that are subject to national or international constraints. Moreover, all chemicals to be used are placed on metal stands with liquid collectors to prevent any leakage of small amounts of these substances. All chemicals are stored in appropriate and clearly signalled areas, to be accessed only by individuals with special permission, who know the safety regulations in detail.

### PROJECTS AIMED AT IMPROVING EFFICIENCY DURING THE PRODUCTION PROCESS

The Group corporate culture focuses on the efficiency of resources and processes. All facilities with the support of all employees host special projects to help in this direction and their progress is systematically recorded and assessed.

- **zero pellet loss**
- **zero waste**





## Reduction of waste and maximization of reprocessing and recycling opportunities

[Material topic]

### Performance

#### WASTE MANAGEMENT

[GRI: 103-3, 306-3, SASB: RT-CH-150a.1, RT0204-07, ATHEX ESG: A-E3]

##### Hazardous waste in 2021

**213 tn**

224 tn in 2020

##### Change 2020/2021

**-4.9%**

2.4% 2019/2020

##### Non-hazardous waste in 2021

**4,359 tn**

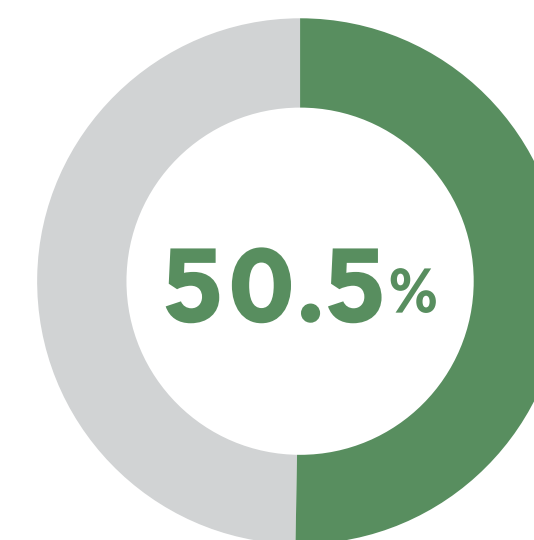
6,128 tn in 2020

##### Change 2020/2021

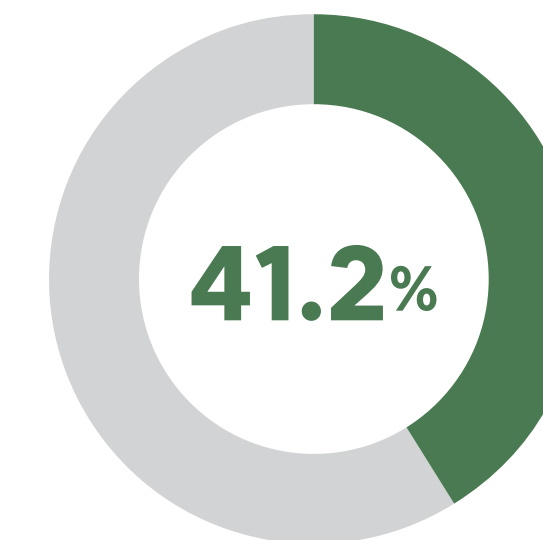
**-28.9%**

13.5% 2019/2020

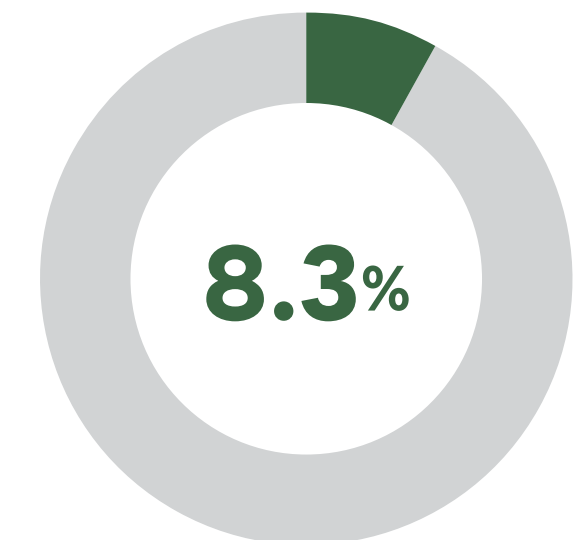
#### NON-HAZARDOUS WASTE MANAGEMENT



RECYCLING



LANDFILL DISPOSAL



ENERGY RECOVERY

Detailed information included in Tables 3 a, b, c (Appendix 1: Info tables)



# Circular Economy Platform

## Approach



The environmentally targeted platform of the Thrace Plastics Group is based on the 3 axes of the circular economy REDUCE | REUSE | RECYCLE and networks companies, brands, public bodies and consumers with the aim of reducing the environmental footprint throughout the value chain.



### CONTRIBUTES:

- in the creation of lighter products with the aim of reducing the use of plastic while maintaining the same technical characteristics
- in the creation of multi-use products that replace their single-use counterparts
- in the creation of products from recycled raw material



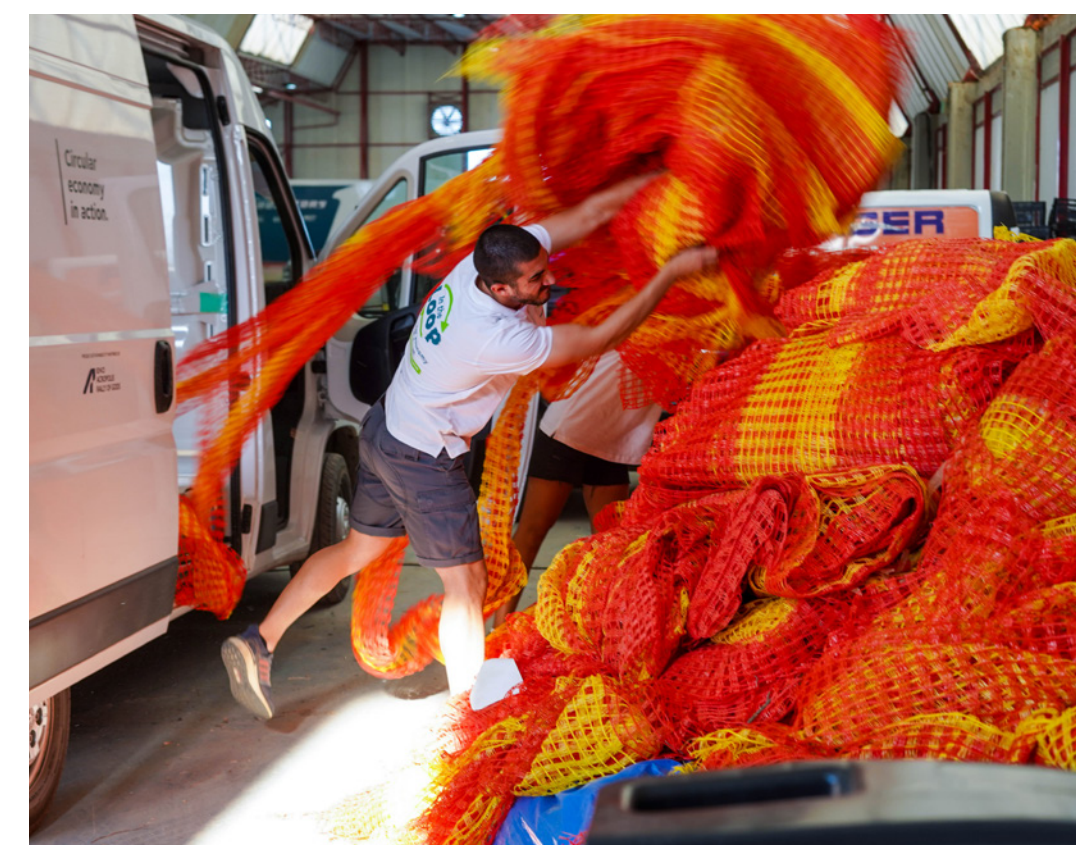
### DESIGNS:

- specialized reuse systems that allow recording and certification of the number of uses
- specialized closed/controlled cycle recycling systems



### INFORMS:

- for the circular economy in plastic products
- for upcycling





## Circular Economy Platform

### BENEFITS

- The transition from the linear to the circular economy is taking place
- The environmental footprint of the products is reduced
- Natural resources are preserved
- Plastic waste is reduced
- Reuse is made possible
- More products are produced from recycled raw material

### Performance

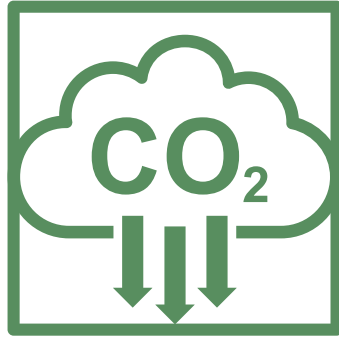
[THR: Partner participation in the platform IN THE LOOP]

Active members in 2021

**50**







## Reduction of greenhouse gas emissions

[Material topic]

### Approach

[GRI: 103-2, 102-11, 201-2, SASB: RT-CH-110a.2, RT0204-02, ATHEX ESG: A-E2, SS-E1]



The improvement of data collection for the accurate calculation and measurement of emissions was integrated in the Group strategic plan during 2021. It is now in the process of establishing relevant reduction targets and updating them through the international Science Based Targets Initiative (SBTi). The Group also took actions to save energy, optimally manage waste recycling and increase the use of recycled raw material. These actions set the stage for defining specific objectives.

To maximize business opportunities and mitigate climate change risks, the Group is basing its business model on an integrated process for risk assessment, having first identified its strengths and weaknesses, the opportunities arising but also the threats towards the environment through a SWOT analysis. Meanwhile, the Group participates in the international organization CDP, to evaluate the way of managing its effects on the environment and climate change.

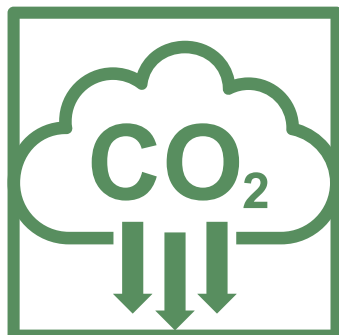
**To respond immediately to the risks and opportunities from climate change, all Group companies follow the same Environmental Policy, while environmental management officers have been appointed to monitor companies' performance through an Environmental Management System.**

### SPECIALIZED PLATFORM FOR CALCULATING GREENHOUSE GAS EMISSIONS

Recognizing the importance of recording and reducing direct and indirect greenhouse gas emissions, the Group in 2021 employed a specialized platform to record and monitor them for all companies, while in 2020 recorded only for the companies with the greatest impact. The key pillars of action to reduce emissions are to reduce energy consumption during production, increase the use of renewable energy sources, increase the content of recycled material, and reduce waste.

### ENERGY EFFICIENCY IMPROVEMENT

The Group is constantly taking measurable actions for energy saving, such as replacing energy-consuming equipment with alternatives requiring less energy, continuously monitoring energy consumption, and taking measures to reduce it, raising awareness and informing employees.



## Reduction of greenhouse gas emissions

[Material topic]

### INVESTMENT IN RENEWABLE ENERGY SOURCES

The use of renewable energy sources and the improvement of energy efficiency are key pillars for the fulfilment of the climate objectives and the long-term strategy of the European Union. After all, the European Green Deal also focuses on the transition to clean energy, the promotion of energy efficiency and the development of an energy production sector that will be largely based on renewable energy sources. Actions that will contribute to the reduction of greenhouse gas emissions and the upgrading of the quality of life.

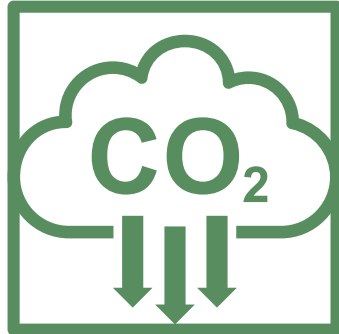
In this context, the Group constantly invests in the use of energy from renewable sources. During 2021, it invested in a photovoltaic park with a capacity of 1.5 MW, while by the end of 2022, 6 MW will be operating with a clear plan for further expansion.

Photovoltaic panel expansion to reach

**6 MW**

by the end of 2022





## Reduction of greenhouse gas emissions

[Material topic]

### Performance

[GRI: 103-3, 302-1, SASB: RT-CH-130a.1, RT0204-04, ATHEX ESG: C-E3]

Energy consumption  
in 2021

**210,229 MWh**

184,985 MWh in 2020

Change 2020/2021

**13.7%**

-4.5% 2019/2020

Energy consumption  
from renewable sources in 2021

**7,736 MWh**

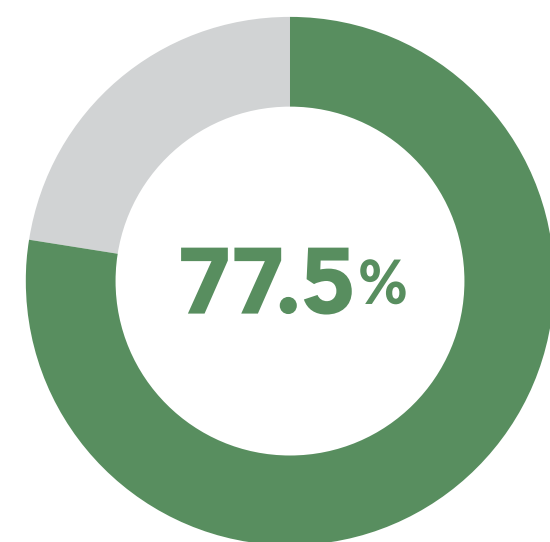
6,602 MWh in 2020

Change 2020/2021

**17.2%**

0.3% 2019/2020

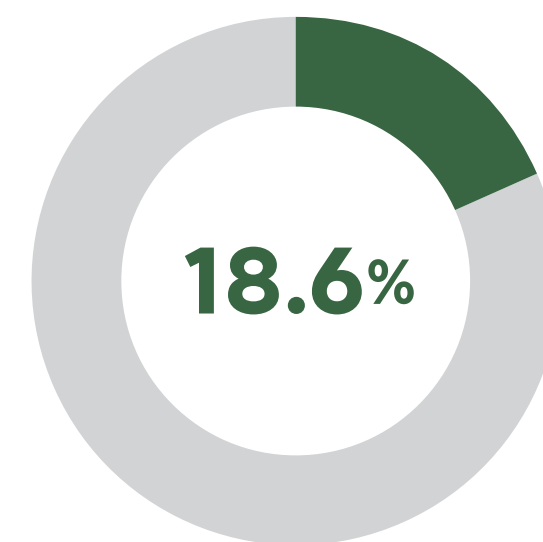
### ENERGY CONSUMPTION



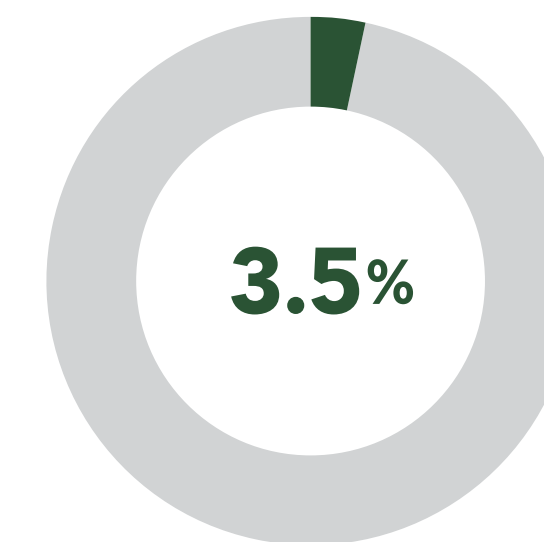
ELECTRICAL ENERGY



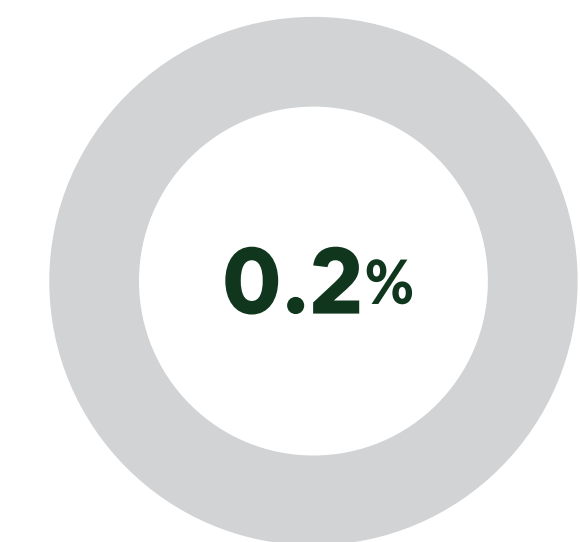
THERMAL ENERGY



FUEL

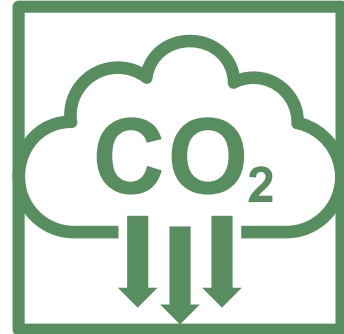


GEOTHERMAL ENERGY



ENERGY FROM  
PHOTOVOLTAIC

Detailed information included in Tables 4 a, b, c (Appendix 1: Info tables)



## Reduction of greenhouse gas emissions

[Material topic]

### ENERGY INTENSITY

[GRI: 103-3, 302-3]

The Group monitors the energy consumption during production with the goal to optimize efficiency through energy saving actions and investments in machinery.

Group energy intensity 2021

**466.9 MWh/revenue (€ mil.)**

542.6 MWh/revenue (€ mil.) in 2020

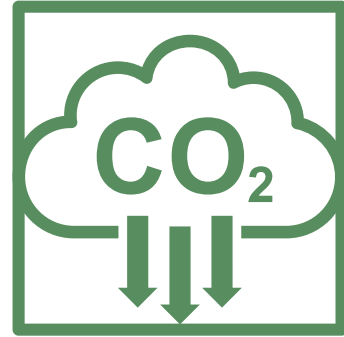
Μεταβολή 2020/2021

**-14%**

-7.7% 2019/2020

Detailed information included in Table 5 (Appendix 1: Info tables)





## Reduction of greenhouse gas emissions

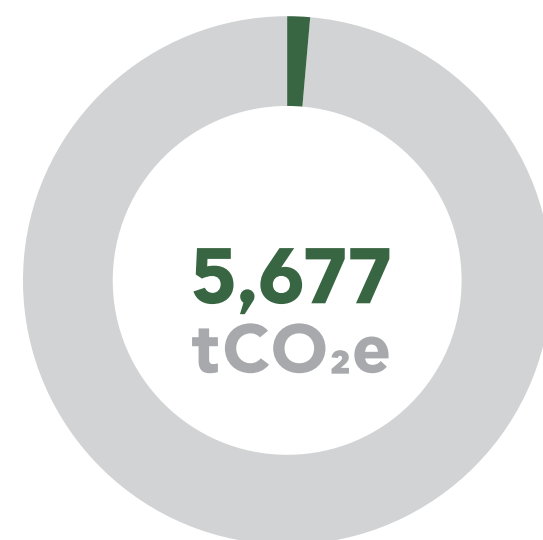
[Material topic]

### DIRECT AND INDIRECT EMISSIONS

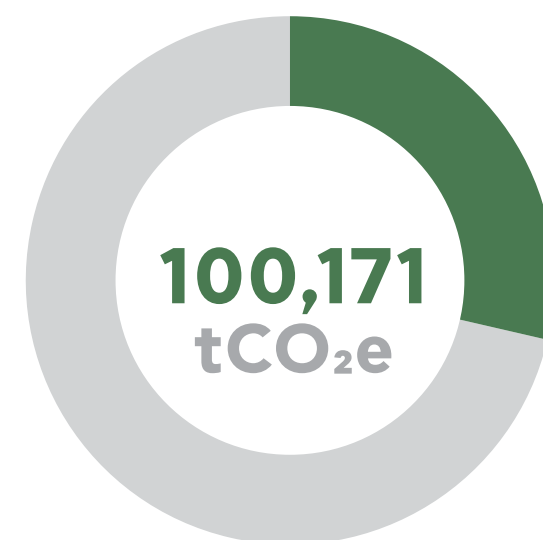
[GRI: 305-1, 305-2, 305-3, 305-4, SASB: RT-CH-110a.1, RT0204-01, ATHEX ESG: C-E1, C-E2, A-E1, SS-E1]

For the calculation of greenhouse gas emissions, the Group employs a specialized platform which is aligned with the internationally established GHG Protocol methodology as well as with ISO 14064-3, where tCO<sub>2</sub>e refers to total greenhouse gas emissions in tons of carbon dioxide equivalent.

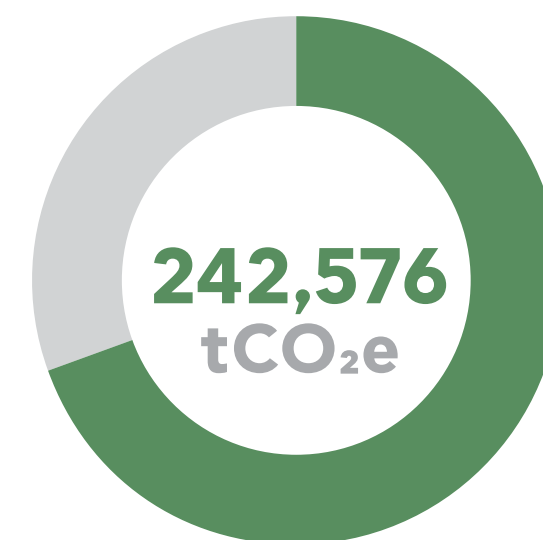
### CARBON FOOTPRINT (tCO<sub>2</sub>e)



**SCOPE 1**  
DIRECT EMISSIONS



**SCOPE 2**  
INDIRECT EMISSIONS



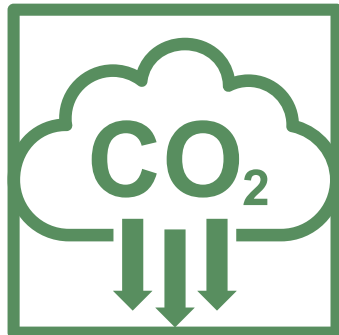
**SCOPE 3**  
INDIRECT EMISSIONS

Detailed information included in Table 6 (Appendix 1: Info tables)

### ANALYSIS OF THE INDIRECT EMISSIONS RELATED TO THE VALUE CHAIN (SCOPE 3)

Purchase of goods and services	71.2%
Upstream transport and distribution	16.3%
End-of-life treatment of sold products	5.0%
Capital goods	3.0%
Downstream transport and distribution	2.1%
Fuel and energy related activities	1.3%
Employee commuting	0.4%
Waste generated in operations	0.4%
Business travel	0.2%
Leased assets	0.1%

\*In cases where analytical data is not available, modeling methods have been used.



## Reduction of greenhouse gas emissions

[Material topic]

### GREENHOUSE GAS EMISSIONS INTENSITY

Group emission intensity (Scope 1) for 2021

**13.2 tCO<sub>2</sub>e/revenue (€ mil.)**

Group emission intensity (Scope 2 Location based)\* for 2021

**232.9 tCO<sub>2</sub>e/revenue (€ mil.)**

Group emission intensity (Scope 2 Market based)\* for 2021

**153.4 tCO<sub>2</sub>e/revenue (€ mil.)**

Group emission intensity (Scope 3) related to the value chain for 2021

**564.1 tCO<sub>2</sub>e/revenue (€ mil.)**

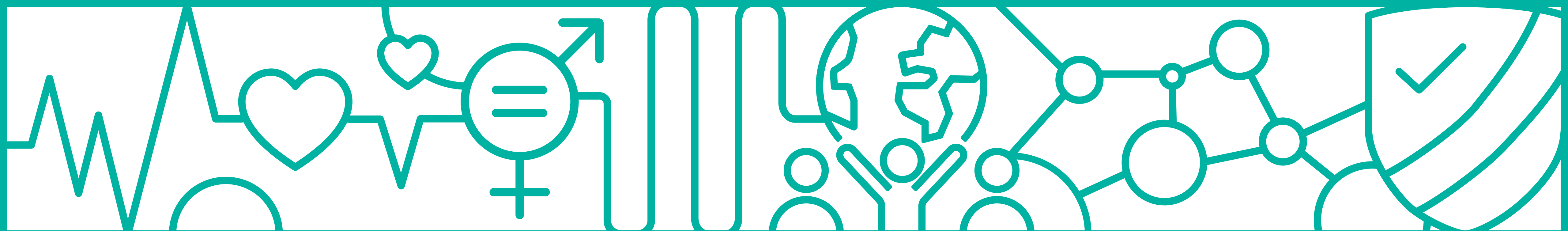
*\*In the location-based method, the calculation is based on the average emission intensity of a local electricity network, while in the market-based method, it is based on a special purchase contract or agreement for energy.*



In 2017, 1080 cypress trees were planted at the premises in Xanthi as part of the Group's contribution to sequestering CO<sub>2</sub> from the atmosphere.

Estimated CO<sub>2</sub> sequestration for the years 2018 - 2021

**62 tn**



# SOCIAL & WORK-RELATED TOPICS

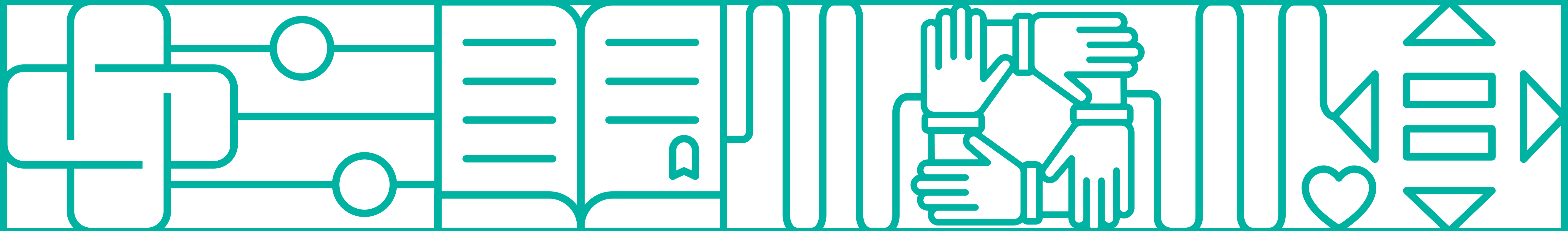
Creation and safeguarding of employment

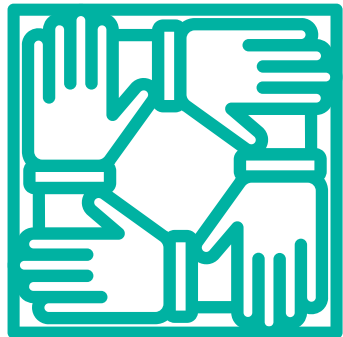
Defense of human rights at work

Assurance of the health, safety and well-being of employees

Assurance of product quality and customer health and safety

Support of local community, maintaining active participation and cooperation





# Creation and safeguarding of employment

[Material topic]

## Approach

[GRI: 103-2]



The Group focuses strongly on labour topics, such as workers' rights, health and safety in the workplace, training and education of employees. It also acknowledges the influence and opportunities created by the Group activities in local communities.

Regarding its products, it recognizes and seeks to eliminate any risk of harming human life and health, taking measures to eradicate dangerous components or defects during products' manufacture, offering and use.

**Part of the recruitment strategy is to support local communities by hiring people from the local communities where the companies of the Group are operating, as well as graduates of local educational institutions and universities.**

## RECRUITMENT PROCESS

To select new employees, the Group relies on objective criteria that exclude any possibility of discrimination due to race, religion, gender, nationality, beliefs, age, disability etc. When new job positions arise, the Group employees have a priority in expressing their interest through the internal mobility processes, before the positions become open to the general public.

The Group follows two different recruitment procedures and appoints a special committee for the assessment of candidates to ensure transparency:

- employee in production (blue collar worker)
- employee in administrative position (white collar worker).

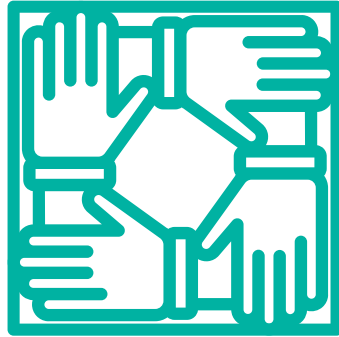
## POLICY FOR FAIR PAY AND EQUAL OPPORTUNITIES

[ATHEX ESG: A-G4]

The Group has an Suitability Policy and a Remuneration Policy for the members of the Board of Directors. These define on one hand the existing rights of the Board of Directors' members and the obligations of the Group towards them, and on the other the terms under which a wage will be provided to them. The policies are published on the Group's Website.

The Group has a Human Resources and Payroll Policy for employees. The level of fixed remuneration is determined in accordance with the principle of paying reasonable and fair remuneration to the most suitable person, considering the level of responsibilities, knowledge and experience required for each role, while variable pays do not apply. At the same time, the Group ensures that its long-term goals are being served and seeks to associate career advancement and remuneration to personal performance and goal achievement.





## Creation and safeguarding of employment

[Material topic]

### CONTINUOUS EMPLOYEE TRAINING AND DEVELOPMENT

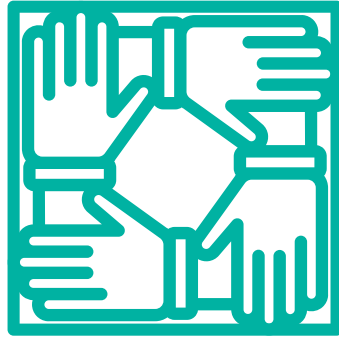
The Group provides an extensive vocational training and education, aiming at the development of employees along with the update of production methods that demand continuous training. Therefore, it actively upgrades its human resources' value for the sake of Group performance and society as a whole. The training of employees is conducted either internally or by external highly knowledgeable consultants. To encourage the continuous development of employees in respect to sustainable development, the Group has created a special sustainable development manual (Sustainability Handbook) which is adapted to the specificity of each Group company using relevant examples, and is available to all employees on the internal online platform. Moreover, in order to empower the members of the Board of Directors regarding the management of Sustainable Development issues related to corporate strategy, the Group organized a two-day educational seminar (ESG Executive Seminar).



### FREEDOM TO JOIN LABOR UNIONS AND THE RIGHT TO COLLECTIVE BARGAINING

The Group respects the right of employees to participate in trade unions and associations. It closely follows the Internal Rules of Procedure, which have been drawn up in collaboration with representatives of the employees and have been submitted to the labor inspectorate. The Rules of Procedure enhance the smooth communication between Administration and representatives of employees on a regular basis, aiming at the presentation of employees' requests as officially recorded by the unions, as well as at an overall discussion on issues related to the workplace and health and safety at work.





## Creation and safeguarding of employment

[Material topic]

### Performance

#### PERCENTAGE OF EMPLOYEES COVERED BY COLLECTIVE BARGAINING AGREEMENTS

[GRI: 102-41, ATHEX ESG: C-S7]

Thrace Plastics Co S.A.	<b>100%</b>
Thrace Nonwovens & Geosynthetics S.A.	
Thrace Polyfilms S.A.	
Thrace Eurobent S.A.	
Thrace Plastics Pack S.A.	
Thrace Greenhouses S.A.	

Thrace Greiner Packaging SRL

**99%**

Don & Low Ltd

**80%**

Thrace Synthetic Packaging Ltd

**10%**

Thrace Ipoma

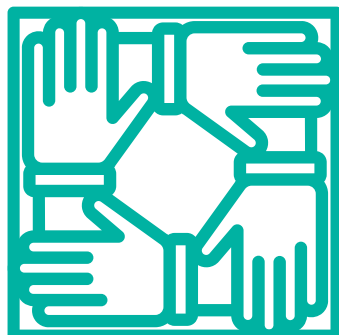
Lumite Inc

Thrace Polybulk AB

**0%**

Thrace Polybulk AS

Thrace Plastics Packaging DOO



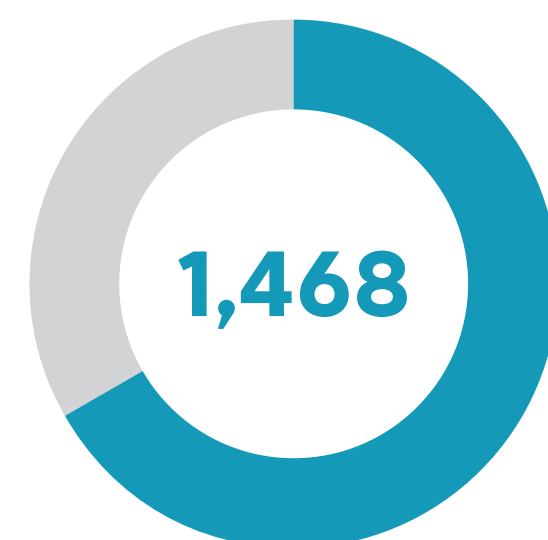
## Creation and safeguarding of employment

[Material topic]

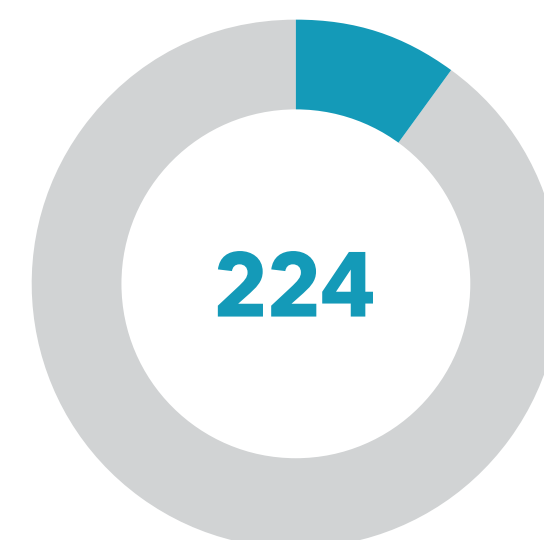
### INFORMATION REGARDING HUMAN RESOURCES

[GRI: 103-3, 102-7, 102-8]

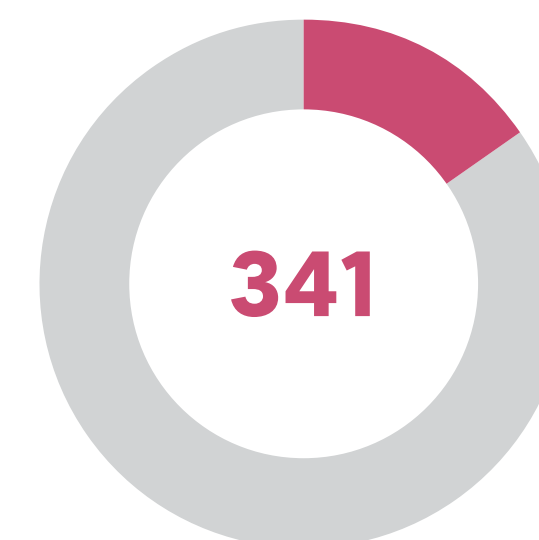
#### TOTAL NUMBER OF EMPLOYEES BY TYPE OF EMPLOYMENT CONTRACT



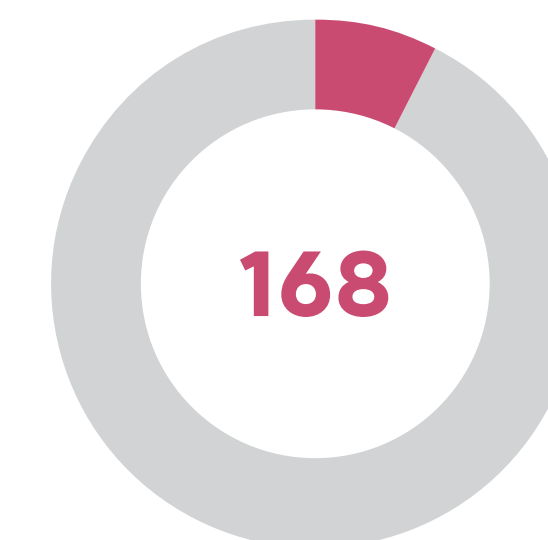
**MEN  
PERMANENT**



**MEN  
FIXED-TERM**

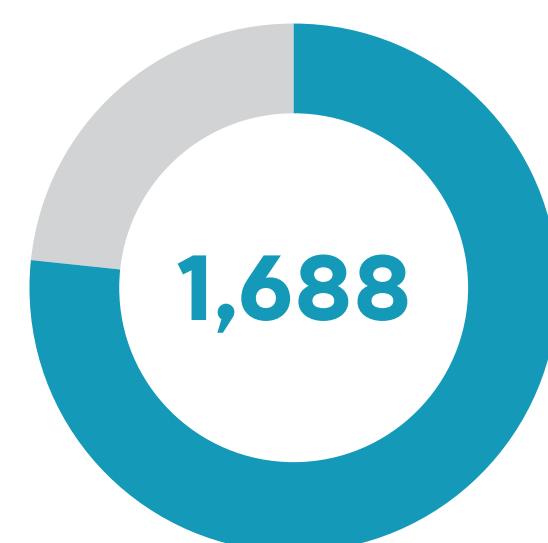


**WOMEN  
PERMANENT**



**WOMEN  
FIXED-TERM**

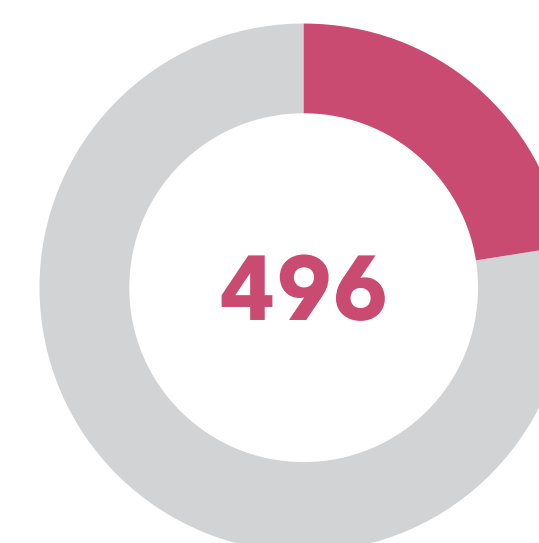
#### TOTAL NUMBER OF EMPLOYEES BY TYPE OF EMPLOYMENT



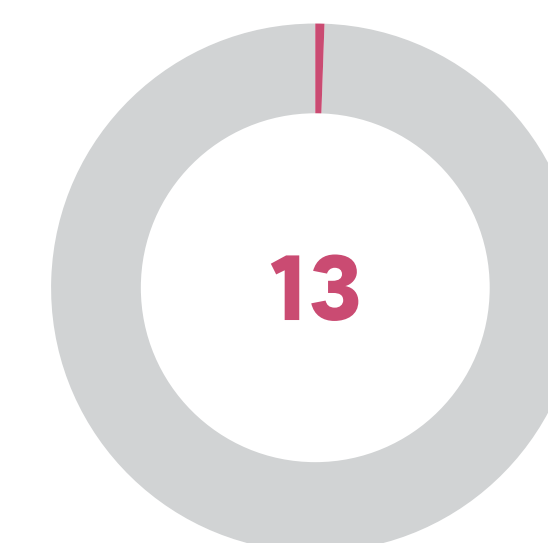
**MEN  
FULL-TIME**



**MEN  
PART-TIME**

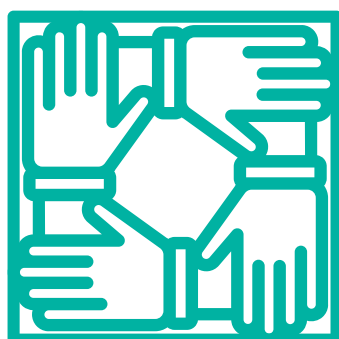


**WOMEN  
FULL-TIME**



**WOMEN  
PART-TIME**

Detailed information included in Table 7 (Appendix 1: Info tables)



## Creation and safeguarding of employment

[Material topic]

### TURNOVER RATES

[ATHEX ESG: C-S4]

Voluntary turnover rate

**11.0%**

Involuntary turnover rate

**10.0%**

Detailed information included in Table 8 (Appendix 1: Info tables)

### FEMALE EMPLOYEES

[ATHEX ESG: C-S2, C-S3]

Female employees rate

**23.1%**

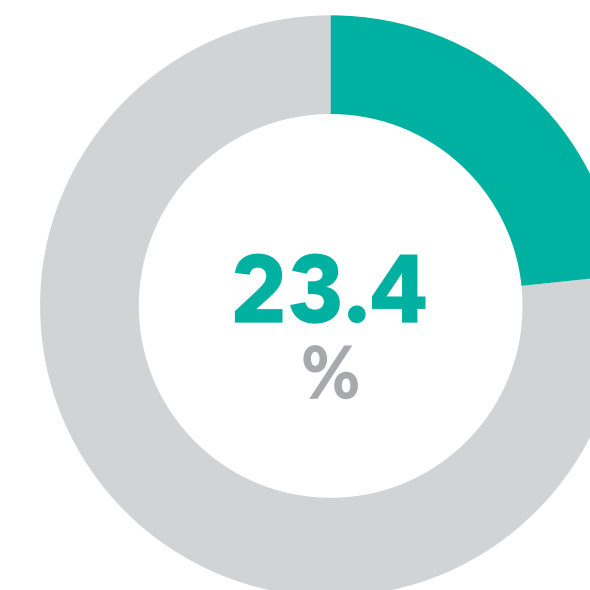
Female employees in management positions rate

**18.0%**

Detailed information included in Table 9 (Appendix 1: Info tables)

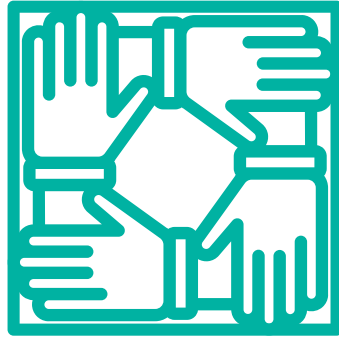
### GENDER PAY GAP

[ATHEX ESG: A-S3]



**SALARY RATIO  
MEN / WOMEN**

Detailed information included in Table 10 (Appendix 1: Info tables)



## Creation and safeguarding of employment

[Material topic]

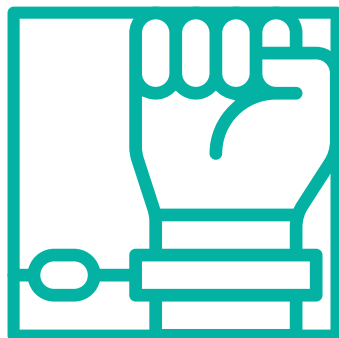
### AVERAGE TRAINING HOURS BY GENDER, FUNCTION, GRADE AND LEVEL

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

	Men	Women
Offices	<b>20.8</b>	<b>10.4</b>
Production	<b>2.7</b>	<b>2.9</b>
Maintenance	<b>9.5</b>	<b>0.1</b>
Logistics	<b>3.3</b>	<b>8.0</b>

	Men	Women
Senior management	<b>7.1</b>	<b>5.4</b>
Middle management	<b>12.1</b>	<b>11.2</b>
Other Employees	<b>5.4</b>	<b>3.5</b>
Average hours of training (10% of higher paid employees)	<b>5.2</b>	<b>4.1</b>
Average hours of training (90% of lower paid employees)	<b>5.8</b>	<b>4.1</b>

Detailed information included in Table 11a, b and 12 (Appendix 1: Info tables)



## Defense of human rights at work

[Material topic]

### Approach

[GRI: 103-2]

The Group recognizes the risks associated with human rights, both within the workplace and throughout the supply chain, such as possible discrimination against employees due to race, religion, gender, nationality, beliefs, age, disability etc., violation of the privacy of employees, and forced child labour.

### RESPECT OF HUMAN RIGHTS

[ATHEX ESG: C-S6, SS-G1]

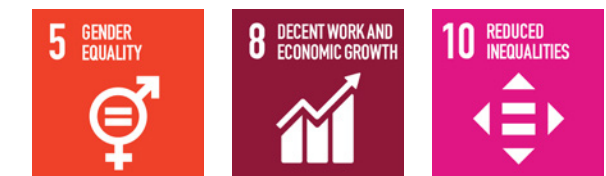
Following the Code of Ethics and Conduct as expressed in a special chapter regarding human rights, the Group is committed to zero tolerance for acts of harassment in the workplace, forced child labor and any other type of discrimination.

**It also commits to resolving complaints and treating employees in a fair and impartial way, it has established guidelines and internal rules and informs employees through the Internal Work Regulations.**

### WHISTLEBLOWER PLATFORM

[ATHEX ESG: SS-G1]

The Group has developed a platform for anonymous or signed reporting (whistleblowing mechanism platform) which will be fully operating in 2022. Through this platform, employees have the possibility to report offending behaviors and situations, which are then investigated by the Group.



### PROTECTION OF PERSONAL DATA

[ATHEX ESG: C-G6]

The Group respects the privacy of stakeholders and treats their personal data as strictly confidential, in compliance with the relevant legislation. It strictly adheres to the General Data Protection Regulation (GDPR) EE 2016/679, as well as the national legislation Law 4624/2019 concerning the protection of individuals against the processing of personal data. Since 2018, the Group is applying measures to comply with the requirements of the Regulation, along with implementation audits and periodic staff training.

**An employee responsible for Data Protection has been appointed at a Group level to ensure that data are being protected, while an insurance contract has been established in case of loss personal data.**

The Privacy Statement is available on the Group's Website.

### Performance

[GRI: 103-3, 406-1]

There have been no confirmed incidents of discrimination due to race, religion, gender, nationality, beliefs, age, disability, etc., including incidents of harassment or human rights violations, nor confirmed incidents of personal data violations.

Confirmed incidents related to discrimination, harassment or violation of human rights in the Group

0



# Assurance of employee health, safety and wellbeing

[Material topic]

## Approach

[GRI: 103-2, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, SASB: RT-CH-320a.2]



The health and well-being of employees are emerging as important issues for the Group, as the priority remains to ensure an environment that respects the daily struggle of all employees to remain creative and productive while also being healthy and safe.

Assuring the health of employees is one of the basic practices of the Group, setting as a primary strategic goal to minimize the possibilities for the occurrence of a workplace accident, as well as for the manifestation of occupational diseases.

**At the end of 2021, the Group also formulated a life and health insurance program for its employees, which was activated at the beginning of 2022.**

## HEALTH, SAFETY AND ENVIRONMENTAL POLICY

The Group has established certification systems (mentioned in page 17) and a Health, Safety and Environment Policy aiming at:

- Training employees in the workplace
- Assessing and prioritizing hazards in the workplace
- Operating in compliance with the health and safety legislation in force and all the related legislative requirements and standards
- Applying measures to prevent health and safety accidents and incidents





# Assurance of employee health, safety and wellbeing

[Material topic]

## HEALTH AND SAFETY PROCEDURES

Workplace hazards have been identified and evaluated. To eliminate hazards and minimize the chances for an accident, corrective or preventive actions have been determined, such as:

- Employee training and updating in the Group premises on matters of health and safety in the workplace, focusing strongly on introductory training, which introduces the main guidelines for safety at work.
- Risk assessment for all facilities.
- Application of a safety project, which involves project teams in all facilities who meet on a monthly basis, list the risks they identified and handled, exchange information on safety related matters, discuss and take respective action.
- Raising awareness among employees on matters of health and safety, by placing safety messages and rules on central spots of the facilities, providing apparel with safety related messages etc.
- Recording and investigating cases related to accidents/incidents or almost incidents; employees are encouraged to confidentially report any dangerous work practices or hazards they identify at work.
- Setting responsibilities for health and safety tasks by the Director of the facility in collaboration with the Safety Engineer and Occupational Physician.
- Systematic monitoring of production processes, machinery and equipment, to ensure they are safe and in good condition.
- First aid boxes and fire extinguishers who are readily available, escape exits that are clearly marked and unobstructed.
- Maintenance and cleaning of the workplace to ensure clean and comfortable working conditions, such as a right temperature, adequate ventilation and lighting.
- Use of a special software to assess the quality, environment, health and safety and to record incidents of non-compliance with these matters.

## PROPER USE OF SAFETY EQUIPMENT

The Group ensures that all employees are provided with the equipment necessary to realize their tasks safely and that they are well informed about the proper use of the equipment and the risks involved in their work. It is a top priority to provide employees with all the necessary Personal Protective Equipment, such as:



## PREVENTION AND AVOIDANCE OF ANY TYPE OF INJURY

The Group continuously monitors and records incidents at its facilities. The main types of confirmed injuries are:

- Limb cutting by a sharp surface
- Limb injury on a moving cylinder
- Shoulder injury
- Fractured limbs

### GROUP GOAL

To prevent and avoid any kind of injury





# Assurance of employee health, safety and wellbeing

[Material topic]

## FACILITY SAFETY

The Group applies safety measures in its facilities by conducting risk assessments on a regular basis. These are submitted, upon request, to labour inspectors and certification bodies in order to certify that the measures applied are in line with the safety risk and in accordance with the legislation in force. The Group complies with all legal requirements for levels of noise, odour, light and vibration, as well as for emergency and evacuation plans, providing relevant training to employees. These issues are monitored on a regular basis and preventive or even corrective measures are being taken.

**Additionally, parameters which can be harmful factors for the environment and health (noise, suspended particles, etc.) are monitored at regular intervals.**

## COMMUNICATION AND INFORMATION MEDIA FOR THE EMPLOYEES

All Group facilities are equipped with screens displaying informative presentations on several topics regarding the environment, health and safety, sustainable development, and anti-corruption. The communication is empowered with several tools for networking, formal and informal communication, teleconferences, file exchanges, internal information, etc. (Yammer, Teams, One drive).

## Performance

### WORK-RELATED INJURIES

[GRI: 103-3, 403-9, 403-10, SASB: RT-CH-320a.1, ATHEX ESG: SS-S6]

Number of deaths as a result of injury

0

Number of accidents with significant injuries

0

Total number of confirmed injuries

49

Total number of days lost due to injuries

708

*Detailed information included in Table 13 (Appendix 1: Info tables)*

### WORK-RELATED DISEASES

[GRI: 403-10]

Number of confirmed diseases/deaths of employees or partners as a result of a disease related with work

0

*Detailed information included in Table 14 (Appendix 1: Info tables)*



# Assurance of product quality, customer health and safety

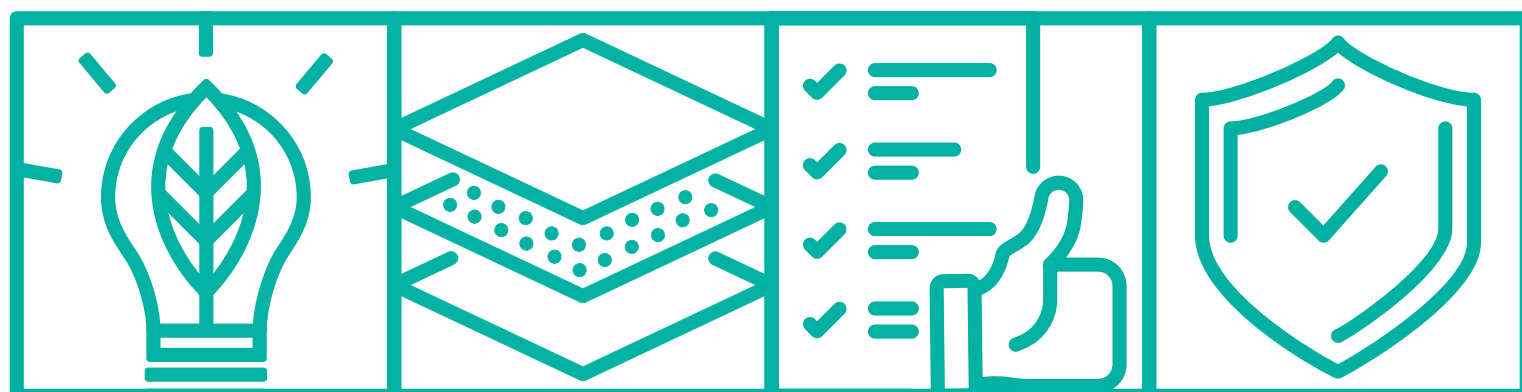
[Material topic]

## Approach

[GRI: 102-11, 103-2, ATHEX ESG: SS-S1, SS-E5]

**It is a main priority of the Group to offer innovative products and integrated solutions that can be adapted to customers' needs and requirements, and that capture the vision for high quality and customer safety.**

The Group complies with the relevant national legislation and adopts international guidelines, safety rules, best practices and industry standards for the production and design of its products. Moreover, it follows best practices such as propagating a culture on quality, consolidating partnerships with suppliers and customers to optimize the added value of the supply chain, and establishing quality management processes.



## FOOD PACKAGING

Special attention is being paid on the production of food packaging. The Group has adopted Quality Management Systems based on food safety international standards, such as ISO 22000, ISO 9001, IFS, BRC; FDA, HALAL, and applies the relevant procedures which include:

- Setting goals and indicators (KPIs) to monitor and review at regular intervals.
- Selecting suppliers based on specific criteria and evaluating them.
- Training staff on Good Manufacturing Practices (GMP) through internal and external trainings.
- Implementing a preventative maintenance program for mechanical equipment.
- Calibrating and maintaining laboratory equipment.
- Cooperating with external labs, which have relevant accreditation / certification.
- Performing quality controls that ensure the safety of packaging materials, such as total and specific migration controls, microbiological control of finished products, microbiological control of water, microbiological control of air in production and storage areas.
- Having prepared a HACCP study and a Risk Assessment at all stages of the production process.
- Having a quality control plan for raw materials, semi-finished and finished products.
- Establishing technical specifications for all manufactured products.
- Carrying out internal inspections, monthly hygiene inspections, regular inspections by Certification Bodies and customers, and non-routine inspections by Public Bodies.
- Implementing PEST CONTROL in collaboration with a licensed external crew.
- Implementing cleaning programs in all facility areas.
- Applying processes for Product Implementation (Flow Chart), Customer Complaint Management, Product Recall and Supplier Complaint Management.
- Cooperating with carriers who have vehicles with specific standards, to ensure the integrity of transported products.





# Assurance of product quality, customer health and safety

[Material topic]

## MASKS

Respectively, in regard to mask production, the Group focuses on safeguarding the health and safety of end users, and implements practices such as:

- Accreditation for medical products using a Quality Management System certified by **ISO 13485:2016**.
- Registration in the Registry of the National Organization of Medication (Greece) and official license for the production of medical devices.
- **CE** marking in compliance with Regulation **(EU) 2016/425** and Regulation **(EU) 2017/745**.
- Certification for **STANDARD 100, OEKO-TEX®, Class I** masks, as well as all textile products.
- **CoVid-Shield** certification

## QUALITY MANAGEMENT PROCEDURES

**Raw material control:** Evaluation of raw materials through trial production and juxtaposition with corresponding products in the laboratory.

**Product control:** Control of products at all phases of production, i.e., control of dimensions, of mechanical properties based on international standards, product compliance with specifications and customer requirements.

**Control of transport packaging:** Use of packaging suitable for products' technical specifications to ensure a smooth and safe transport. Running visual quality checks during loading to ensure suitability and implementing scanning systems to guarantee that only approved products are being loaded.

**Customer satisfaction control:** Regular communication with customers, by phone or in person, to optimize the services provided.

## TRANSPERANCY ON PRODUCT INFORMATION AND CUSTOMER UPDATING

The Group prioritizes product quality and customer safety and has established a Product Liability Policy which describes the establishment and maintenance of a Quality Management System. This System ensures that the products received by the customer are suitable for their use and of consistent quality, in accordance with the recognized ISO standards where appropriate.

## Performance

[GRI: 103-3, 416-2, SASB: RT0204-08, ATHEX ESG: SS-S1]

During 2021 there were no reported cases about non-compliance with existing legislation and applicable regulations regarding the effects of the products on consumer health and safety. Equally, there has been no product recall due to malfunctions by any of the Group companies, and consequently no need to pay relevant monetary compensation.





## Support of local communities, and maintaining an active presence and collaboration

### Approach



Through its business activities and high-performance levels, the Group seeks to produce and distribute, either directly or indirectly, economic value to the communities in which it operates, placing special emphasis on:

- **Strengthening the economies of the countries it operates in, through the cash flows it generates to stakeholders, namely tax payments, payments to suppliers, salary payments to employees, dividends to shareholders and investments in local communities.**
- **Meeting the needs of citizens and societies that surround the Group and are affected by its activities.**
- **Creating employment opportunities through the direct and indirect creation and maintenance of job positions throughout the value chain.**

### SOCIAL CONTRIBUTION POLICY

The Group has established one Social Contribution Policy for all Group companies to identify their responsibility towards the society in which they operate, ensuring that they remain aware of local needs and maintain trust.





## Support of local communities, and maintaining an active presence and collaboration

### SOCIAL CENTRE STAVROS HALIORIS

The STAVROS HALIORIS Social Centre is a civil non-profit company situated in the local community of Magiko in the municipality of Avdera in Xanthi region, operating since 2010. It is named after the late Stavros Halioris, founder and president of Thrace Group, who envisioned its creation.

**The purpose of the Social Centre is to actively contribute to the local community through educational, cultural, recreational and social activities, addressed to both children and adults, with a regular training program accommodating approximately 250 people per training period each year.**

It also organizes events, feasts and excursions of educational and recreational profile for its members; movie screenings for children; cultural, social and educational day-seminars in collaboration with local bodies and scientific partners. The actions of the Social Center include the support of actions of the Workers Union of Thrace Group, the granting of scholarships and financial aid to young people

living in the wider area, who wish to study but are unable to cover their study expenses, as well as the financial support or coverage of the cost of treatment/hospitalization for patients in need in the wider area. Moreover, a medical centre is operating in the premises of the Social Centre, offering primary healthcare services to the inhabitants of the wider area. The Centre also hosts the meetings of the Open Care Centre for the Elderly of Magiko.

Recognizing the necessity of taking effective actions to support both the health system and the vulnerable social groups, the Social Centre collaborated directly with institutions and organizations, including the General Hospital of Chios, the Xanthi Hospital and the non-profit association DESMOS, and carried out donations of personal protective and medical equipment.

Considering the impact of global climate change, the Social Centre will launch activities from 2022 onwards, with the goal to raise awareness among the local communities and children on issues related with the ecology, the use of renewable energy sources and the conservation of biodiversity.





## Support of local communities, and maintaining an active presence and collaboration

### DONATIONS

Thrace Greenhouses has embraced the motto “Nothing goes to waste” and develops initiatives to reduce food waste. Through the Stavros Halioris Social Center, it has contributed to the wider local community where it operates, supplying free products to non-profit organizations.

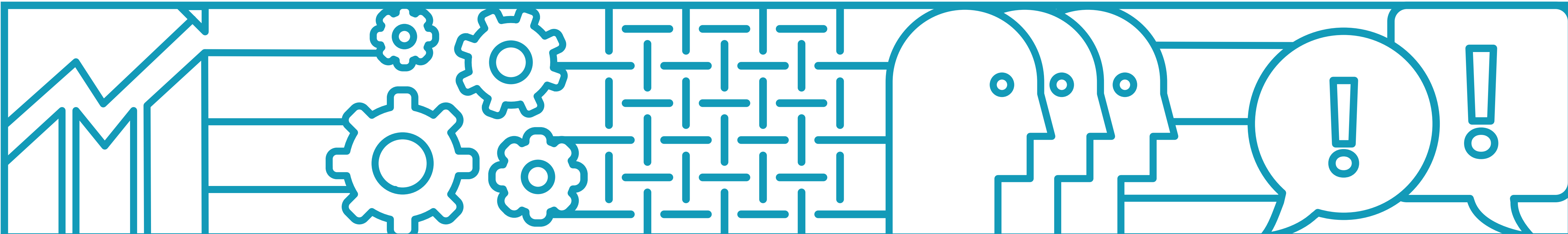
**In 2021, it participated in the “Food Rescue and Donation” network of the non-profit organization “Borume” offering more than 15,000 portions of food, supporting charitable organizations with food in all of Greece.**

At the same time, it supplies with its products on a regular basis the workers in the greenhouses, but also the employees of the Group who work in Xanthi.

### Performance

	2021	2020	2019
Social Centre total spending (€)	<b>380,017</b>	<b>328,623</b>	<b>273,435</b>





# CORPORATE GOVERNANCE AND RESPONSIBLE BUSINESS ACTIVITY

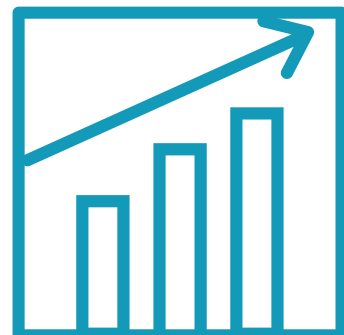
Creation of economic value and economic performance of the Group

Responsible corporate governance and assurance of business ethics and compliance

Assurance of business continuity and preparedness in cases of emergency

Supply chain management





## Creation of economic value and economic performance of the Group

[Material topic]

### Approach

[GRI: 103-2]

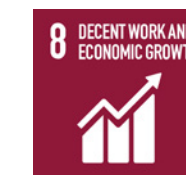
The Group managed to respond successfully to the unprecedented economic and social challenges mainly due to the global health crisis. Driven by financial discipline, it implemented important investments, counterbalancing any negative effects and ensuring the seamless and uninterrupted operation and the creation of value for all stakeholders.

**Within this context, the Group is continuing to create and distribute economic value, both directly and indirectly; directly through the cash flows it generates and specifically through tax payment, supplier payments, payroll payments, dividends to shareholders and investments in local communities; and indirectly, through its operation.**

The uncertainty prevailing in the macroeconomic and financial framework and the unstable economic environment constitute a risk factor that is constantly being assessed.



### Performance



#### DIRECT ECONOMIC VALUE PRODUCED AND DISTRIBUTED

[GRI: 103-3, 102-7, 201-1]

#### DIRECT ECONOMIC VALUE (€ MIL.)



DIRECT DISTRIBUTABLE  
ECONOMIC VALUE



NON-DISTRIBUTABLE  
ECONOMIC VALUE

Οι συνολικές πληροφορίες περιλαμβάνονται στον Πίνακα 15 (Παράρτημα 1: Πίνακες πληροφοριών)





## Creation of economic value and economic performance of the Group

[Material topic]

### BALANCE SHEET COMPONENTS

Source: Annual financial reports of the Group

Assets in 2021

**405.2 € mil.**

341.9 in 2020

Change 2020/2021

**18.5%**

5.8% 2019/2020

Total liabilities in 2021

**152.9 € mil.**

165.8 in 2020

Change 2020/2021

**-7.7%**

-6.3% 2019/2020

Owners' Equity in 2021

**252.3 € mil.**

176.1 in 2020

Change 2020/2021

**43.2%**

20.4% 2019/2020

Sales in 2021

**428.4 € mil.**

339.7 in 2020

Change 2020/2021

**26.1%**

13.9% 2019/2020

Detailed information included in Table 16 (Appendix 1: Info tables)



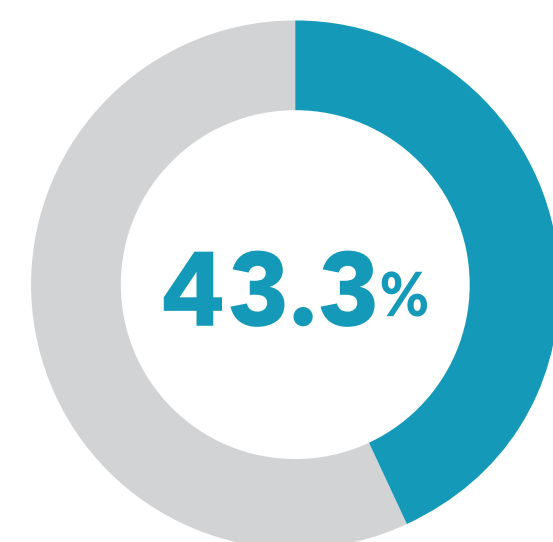
## Creation of economic value and economic performance of the Group

[Material topic]

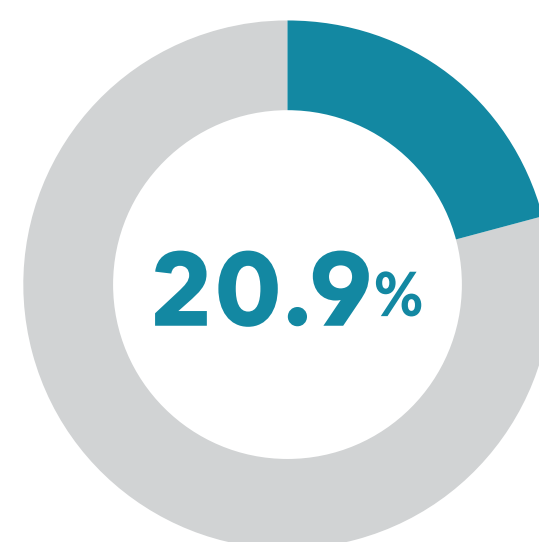
### SHAREHOLDERS

[GRI 102-7]

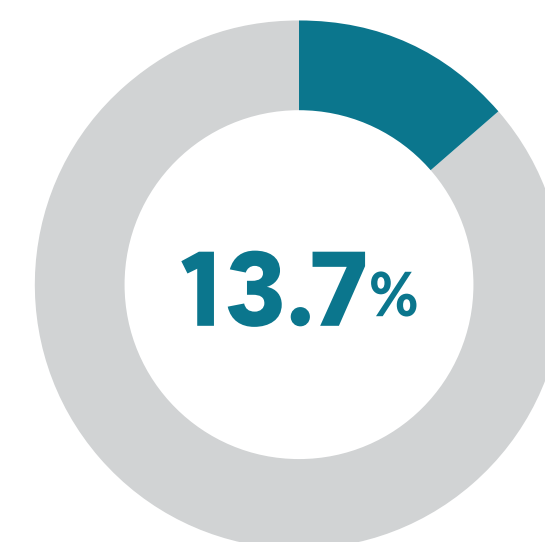
#### SHAREHOLDER HOLDING PERCENTAGE (31/12/2021)



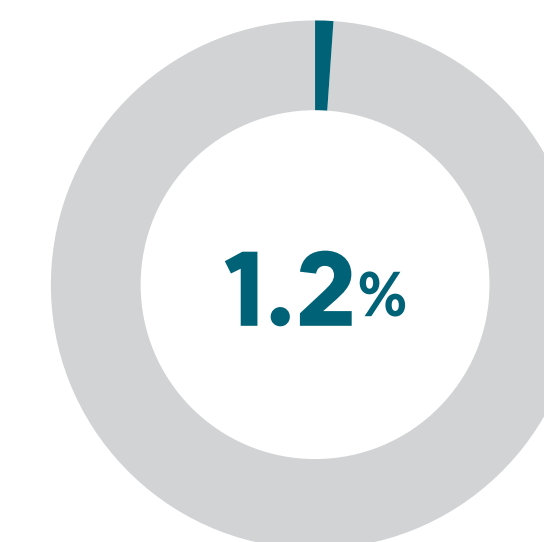
KONSTANTINOS HALIORIS



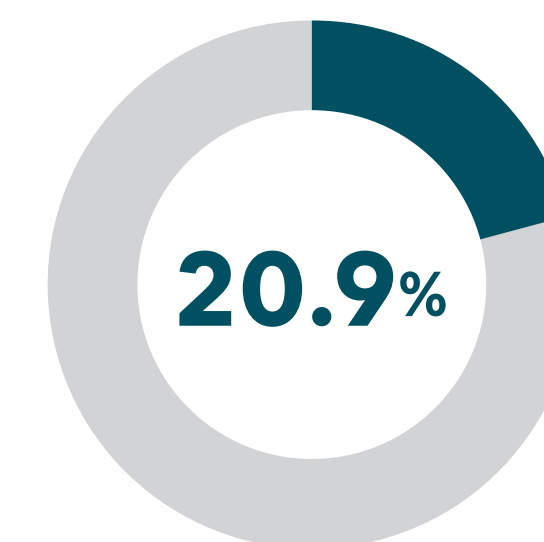
EFFIMIA HALIORI



INSTITUTIONAL INVESTORS



THRACE PLASTICS CO S.A.



OTHERS

Detailed information included in Table 17 (Appendix 1: Info tables)

### ELIGIBLE ECONOMIC ACTIVITIES

[ATHEX ESG: A-S1]

The eligible economic activities of the Group that are contributing significantly to the environmental goals of moderation and adaptation to climate change in accordance with the Taxonomy Regulation 2020/852/EE are the following:

- Production of low-carbon technical fabrics by the Group
- Installation and operation of a photovoltaic power station for co-production of installed power of 1.5 MW via net metering

	Revenues (Turnover)	Capital Expenditures (CapEx)	Operating Expenses (OpEx)
Eligible economic activities	35.9%	43.9%	47.2%
Non-eligible economic activities	64.1%	56.1%	52.8%

The methodology applied is described in detail in the Annual Financial Report of 2021, which is available in the Group website.



# Responsible corporate governance and assurance of business ethics and compliance

[Material topic]

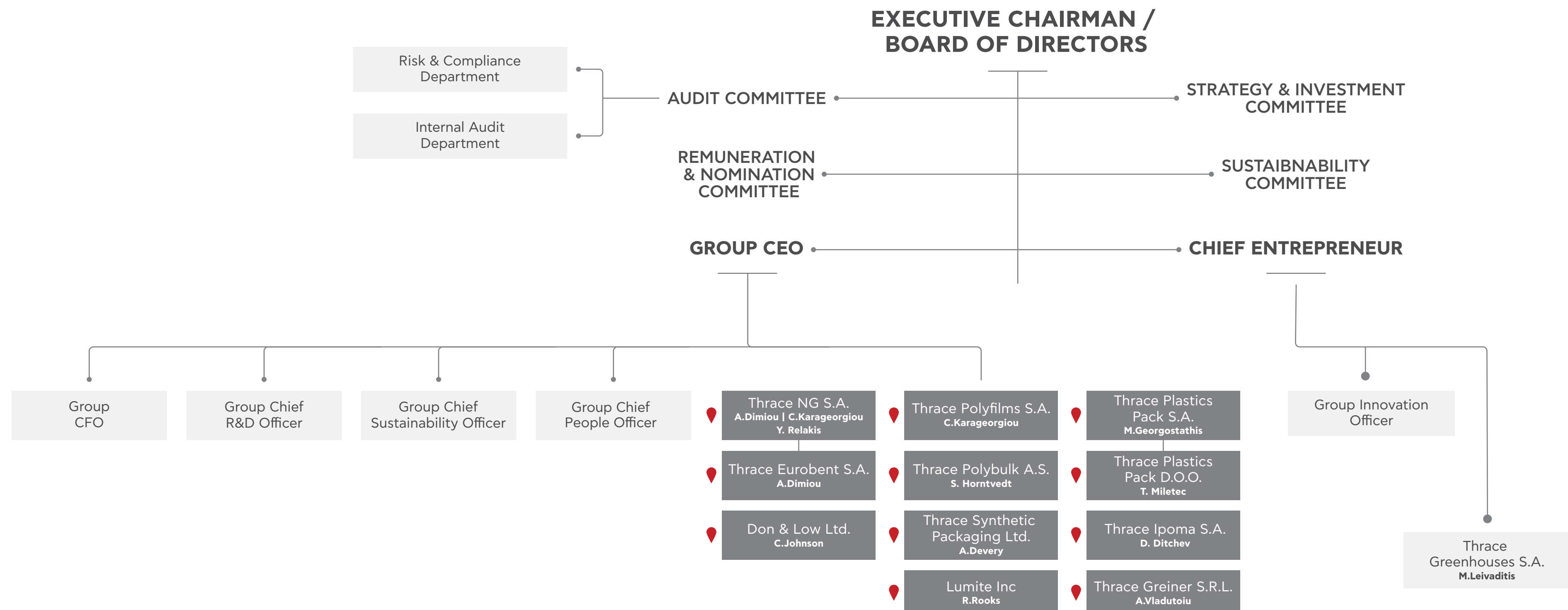
## Approach

[GRI: 103-2]



The Group has adapted and follows an integrated framework of policies, principles and procedures ensuring its transparency and responsible operation. To achieve its business goals, the Group is applying an integrated approach of corporate governance, through which it manages administrative and control issues and also monitors its compliance with the legislation and the legislative framework in force.

## ORGANIZATIONAL CHART





# Responsible corporate governance and assurance of business ethics and compliance

[Material topic]

## GOVERNANCE STRUCTURE

[GRI: 102-18]

The Board of Directors of the Group, consisting of 11 members with a 5-year term, is responsible for the development and monitoring of the effectiveness of the social governance principles, as well as for the assurance of business ethics and compliance.

## BOARD OF DIRECTORS

[ATHEX ESG: C-G1]

<b>Konstantinos Halioris</b>	President of the Board of Directors
<b>Theodoros Kitsos</b>	Vice-president of the Board of Directors, Independent Non-Executive Member
<b>Dimitrios Malamos</b>	Chief Executive Officer, Executive Member
<b>Vasileios Zairopoulos</b>	Non-Executive Member
<b>Christos Schiatis</b>	Non-Executive Member
<b>Christos-Alexis Komninou</b>	Non-Executive Member
<b>Athanasios Dimiou</b>	Non-Executive Member
<b>Georgios Samothrakis</b>	Independent Non-Executive Member
<b>Myrto Papathanou</b>	Independent Non-Executive Member
<b>Spyridoula Maltezo</b>	Independent Non-Executive Member
<b>Nikitas Glykas</b>	Independent Non-Executive Member

Percentage of executive members

**18.2%**

Percentage of non-executive members

**36.4%**

Percentage of independent non-executive members

**45.4%**

Percentage of women in the Board of Directors\*

**18.2%**

\* fulfilling, though, the criteria of adequate gender representation in the Board of Directors, as stipulated in Article 3 of Law 4706/2020



# Responsible corporate governance and assurance of business ethics and compliance

[Material topic]

## COMMITTEES

All committees operate in accordance with Rules of Procedure approved by the Board of Directors.

### AUDIT COMMITTEE

<b>Georgios Samothrakis</b>	Independent Non-Executive Member of the Board of Directors, President of the Committee
<b>Konstantinos Kotsilinis</b>	Non-member of the Board of Directors – third party, Member of the Committee
<b>Konstantinos Gianniris</b>	Non-member of the Board of Directors – third party, Member of the Committee

### NOMINATION AND REMUNERATION COMMITTEE

<b>Theodoros Kitsos</b>	Independent Non-Executive Member of the Board of Directors, President of the Committee
<b>Nikitas Glykas</b>	Independent Non-Executive Member of the Board of Directors, Member of the Committee
<b>Vasileios Zairopoulos</b>	Non-Executive Member of the Board of Directors, Member of the Committee

### STRATEGY AND INVESTMENT COMMITTEE

<b>Konstantinos Halioris</b>	President of the Board of Directors, President of the Committee
<b>Dimitrios Malamos</b>	Executive Member of the Board of Directors, Member of the Committee
<b>Vasileios Zairopoulos</b>	Non-Executive Member of the Board of Directors, Member of the Committee

### SUSTAINABILITY COMMITTEE

<b>Theodoros Kitsos</b>	Independent Non-Executive Member of the Board of Directors, President of the Committee
<b>Konstantinos Halioris</b>	President of the Board of Directors, Member of the Committee
<b>Dimitrios Malamos</b>	Executive Member of the Board of Directors, Member of the Committee
<b>Spyridoula Maltezos</b>	Independent Non-Executive Member of the Board of Directors, Member of the Committee



## Responsible corporate governance and assurance of business ethics and compliance

[Material topic]

### COMBATING OF CORRUPTION

The Group is aware of the risk of incidents of corruption and bribery throughout its value chain. Possible risks are being assessed both within its internal activities and in relation to the activities and transactions with its main stakeholders, such as its customers and suppliers. The Group is committed to zero tolerance towards matters of corruption and bribery, by conducting its business activity with integrity in accordance with the highest standards of ethics and the laws in effect. Within this framework, it has enacted and communicated related principles and policies, while setting up control mechanisms.

### CONTROL MECHANISMS

In order to avoid incidents of corruption and bribery, the Group is taking preventive action by realizing related updates and controls on an annual basis through the **Internal Audit Department**. To discourage any cases of participation in incidents of this sort, disciplinary measures have been specified. In support of these internal procedures, the **Audit Committee** has been established with its duties being the selection and supervision of external auditors, the communication of the result of the obligatory control to the Board of the Directors, the monitoring of the process of financial reporting, as well as of the systems of internal control and risk management and the supervision of the units of internal control and regulatory compliance and risk management.

### CODE OF BUSINESS ETHICS AND CONDUCT

[ATHEX ESG: CG5]

The Group is firmly committed to conducting its business activity with integrity, in accordance with the highest standards of ethics and the laws in effect. The Code of Ethics and Conducts specifies the standards of behaviour required by the employees of the companies of the Group in every country where the Group is operating. The basic principles of the Code are as follows:

- Business ethics
- Respect of human rights
- Diversity and equal representation
- Compliance with the laws and social norms
- Product quality
- Promotion of fair and free competition
- Avoidance of conflict of interest
- Accuracy and completeness of financial information
- Protection of corporate tangible assets
- Transparent and legitimate collaboration with the public authorities
- Realization of all transactions with integrity and protection against corruption
- Data protection and confidentiality
- Good labour relations
- Safety, health and protection of the environment
- Circular economy and climate change
- Social contribution



## Responsible corporate governance and assurance of business ethics and compliance

[Material topic]

### CODE OF CORPORATE GOVERNANCE

The Group, following the related approval by the Board of Directors and in compliance with article 17 of Law 4706/20, applies and adopts the Hellenic Corporate Governance Code (published in June 2021) by the Hellenic Corporate Governance Council (HCGC).

### INTERNAL RULES OF OPERATION

The Rules of Operation contain provisions on the functions, tasks and obligations, as well as on the operating principles, policies, procedures and rules of conduct.

### MANUAL OF GROUP POLICIES

The Manual forms the basis of the policies and procedures of the Group. It aims at establishing a single way of response through a common framework, while specifying the control processes that should be applied at the least.



## Performance

[GRI: 103-3, 205-3, ATHEX ESG: A-G2]

There was no demonstrated incident of corruption or bribery during 2021 and thus no financial loss accrued as a result. Accordingly, no related intention or behaviour of corruption or bribery came to the attention of the Group.

Corruption or bribery incidents in the Group

0

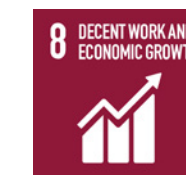


## Assurance of business continuity and preparedness in cases of emergency

[Material topic]

### Approach

[GRI: 103-2]



**In an ever-changing external environment, the Group is called to manage and evaluate a range of business and operational risks that might affect its reputation, resilience and broader growth potential.**

Based on an organized plan, it is identifying the risks and their impact, while enhancing its ability for effective emergency response. Within this framework, the Group has realized a risk analysis and has been examining the risks it might be faced with. To effectively handle these risks, it constantly monitors and determines actions for their limitation.

## IDENTIFICATION OF THE FINANCIAL AND OPERATIONAL RISKS AND OPPORTUNITIES RELATED TO THE CLIMATE CHANGE

[ATHEX ESG: A-E2]

In order to identify the opportunities as well as the natural and transition risks related to the climate change, the Group has started its alignment with the recommendations by the Task Force on Climate-related Financial Disclosures (TCFD) of the Financial Stability Board. The climate change and energy transition are affecting the activities of the Group, while simultaneously creating big opportunities via the principles of circular economy, the use of recycled raw material and the investment in renewable sources of energy. At the same time, the Group is aware of the risks and impact of the climate change on its business activity, such as extreme weather events or temperature increase, which might affect the production process in the short-run, medium-run and long-run. To moderate risks and avoid the negative socioeconomic and environmental effects, the Group is constantly being informed and adapts its business model accordingly.





## Assurance of business continuity and preparedness in cases of emergency

[Material topic]

The Group has identified the following categories of risks related to climate change, but also the opportunities to transition to a low-carbon business model with an emphasis on innovation based on the recommendations for climate-related financial disclosure (TCFD). Risks and opportunities have been taken into account when formulating the sustainable development strategy and defining objectives and actions:

Type:	Risks Related:	The Group:
Policy and Legal	with the future requirements created by the changes in the European and national regulatory framework.	monitors the national and international regulatory framework regarding the environment and in particular packaging and recycling, with the aim of leading new markets for innovative, ecologically designed products.
Technology	with the fact that the transition to a low-carbon economy presents demanding adaption to the production process.	monitors potential risks in its internal processes, such as requirements in the production of sustainable products or requirements in new equipment investments.
Market	with changes in industry structure in a carbon sensitive economy.	assesses environmental risk in terms of carbon emissions, monitors and records direct and indirect emissions from all its operations.
Reputation	with differences in consumer preferences.	recognizes the transitional risks associated with changes in consumer preferences by providing solutions for sustainable products with a positive environmental footprint.



## Assurance of business continuity and preparedness in cases of emergency

[Material topic]

Type:	Opportunities that arise:	The Group:
Energy Source	from the increase in the use of renewable 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 RES, and continuously takes measurable actions to save energy.
Markets	from the shift of existing markets to new sustainable products and processes, where the use of recycled or reuse will add value to the customer.	has developed specialized upcycling systems that enables the recording and certification of the percentage of recycled raw material or systems that enable recording and certification of the number of reuses.
Products and Services	from the development of products and solutions based on the circular economy that add value to the customer.	applies the circular economy model in practice, through specific actions, such as the development of closed recycling systems for the production of new products or the design and production of reusable products.
Resilience	from the execution of projects aimed at improving efficiency during the production process.	carries out targeted projects, such as zero pellet loss, energy efficiency during the production process, waste reduction, reuse of production scrap.
Resource Efficiency	from increasing the use of recycled raw material.	has set as a priority, through its voluntary commitment to the European Union, to replace 8,500 tons of plastic material with recycled by 2025.



## Assurance of business continuity and preparedness in cases of emergency

[Material topic]

### COPE WITH THE EFFECTS OF THE PANDEMIC

**The Group follows closely and responsibly the developments around the pandemic and continues applying in full a plan for the assurance of the health and safety of its employees, as well for its uninterrupted operation so that it would not suffer from any consequence that could negatively affect its business continuity.**

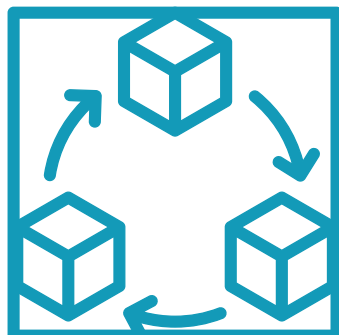
More specifically, in accordance with the guidelines and recommendations of the World Health Organization (WHO) and the Local Public Health & Civil Protection organizations, from the very beginning of the outbreak of the pandemic, the Group has put into effect the following measures, which are being assessed on a regular basis:

- Formation of crisis management teams with the participation of the administrations of the Group and Group subsidiaries, Human Resources departments, Occupational Physicians and Safety Technicians, which are meeting on a weekly basis in order to maintain and enrich the measures of protection and monitor the cases.
- Provision of information regarding the way of transmission of the virus, the measures of prevention, as well as recommendations and instructions of personal hygiene, according to the instructions of the competent authorities.
- Provision of personal protective equipment.
- Realization of COVID-19 testing.
- Realization of disinfections on a regular basis.
- Application of remote working for office workers, as far as reasonably possible.
- Protection of employees who belong to vulnerable groups, by directly removing them from the facilities without any negative impact on their remuneration.
- Establishment of particular procedures and protocols for all visitors.
- Realization of meetings, Board meetings and General Meetings via teleconference, in accordance with the stipulations of the related legislative framework in force.
- Application of the obligatory medical protocols in case of infection of an employee or contact with a case.

## Performance

[GRI: 103-3]

Despite the difficulties due to the pandemic at a socio-economic level, the Group, through the organized business continuity plan, demonstrated resilience at every level of its operation, managing to maintain the availability and distribution of all its products, while at the same time expanding the investment plan with the installation of new production lines and equipment.



## Supply chain management

### Approach

[GRI: 102-9]

Apart from financial risks related to the supply chain, the Group is also aware of non-financial risks mainly related to the safeguarding of human rights and the combatting of corruption.

### EVALUATION OF SUPPLIERS IN RELATION TO THEIR SOCIAL AND ENVIRONMENTAL PERFORMANCE

[ATHEX ESG: C-S8]

**The Group recognizes that the evaluation and selection of suppliers is an essential business operation in order to achieve a responsible supply chain and, thus, applies practices to determine if a supplier complies with the requirements and prerequisites set for the collaboration between them.**

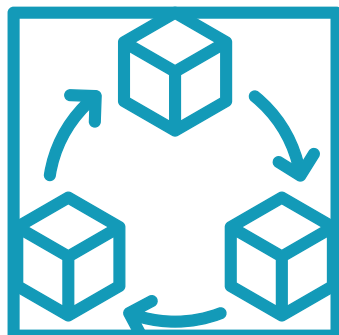
The major categories of suppliers include suppliers of raw materials, marketable goods, electrical power, equipment, packaging, spare parts as well as providers of logistical support services, transport services, consulting, communication and IT services. Several companies of the Group are using special forms through which they collect information from their suppliers related to their collaboration, as well as about matters of social, environmental and social governance context. The Group has identified the importance of this process and has initiated actions towards the finalization of a Group policy for the evaluation of key suppliers, implemented by the Sustainability Committee.



### COMBATting OF CORRUPTION IN THE SUPPLY CHAIN

The Group is aware of the risk of a business partner or supplier getting involved in incidents of corruption and, thus, undertakes all necessary actions, through the due diligence process, to ensure the maximum transparency upon the initiation of every new collaboration. More specifically, the Group is collaborating mostly with major multinational companies that give particular emphasis on matters of transparency and combating of corruption through rules and policies.





## Supply chain management

### HUMAN RIGHTS IN THE SUPPLY CHAIN

[ATHEX ESG: C-S6]

The Group has adopted principles preventing it from any collaboration with suppliers running a high risk of human right violation and commits to promoting the continuous improvement of the standards of international human rights. The fact that most of the suppliers of the Group are operating in countries in the European Union and the U.S., where labour legislation is being kept and matters of human rights are at the centre of attention, safeguards to an extent the minimization of the risk of violating human rights, although it is not possible to take actions to track down cases of violation throughout the supply chain. The employees in the Group have the right and obligation to make use of the platform for reports by name or anonymously (whistleblowing mechanism platform) in order to report any violations, which include cases that might lead to an increased risk of incidents or practices of modern slavery in the supply chain.

### UK MODERN SLAVERY ACT 2015

The Group shows zero tolerance in relation to the breach of the UK Modern Slavery Act 2015. This statement is made in accordance with article 54(1) of the UK Modern Slavery Act 2015 and defines the steps for the prevention of incidents of modern slavery and human trafficking in the supply chain.

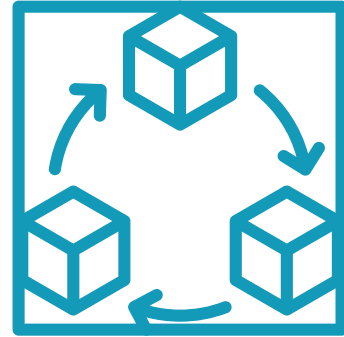
**The Group recognizes the importance of combating this sort of incidents and applies an approach of zero tolerance to all forms of modern slavery throughout its supply chain, to the extent that these can be demonstrated, and is committed to acting with integrity and transparency in relation to this matter.**

### Performance

[THR: Περιστατικά παραβίασης του UK Modern Slavery Act 2015]

Incidents of breach of the UK Modern Slavery Act 2015 in the Group

0



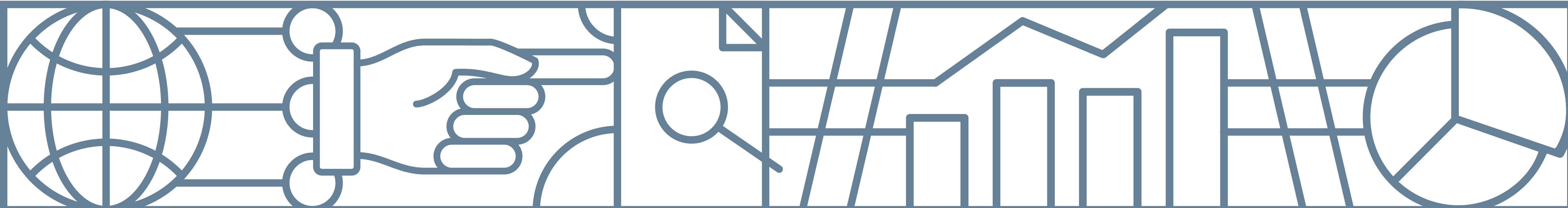
## Supply chain management

### THE SUPPLY CHAIN IN NUMBERS

[GRI: 102-9, 204-1]

	Number of suppliers	Payments to suppliers (€ mil.)
Thrace Plastics Co S.A.	<b>175</b>	<b>3.9</b>
Thrace Nonwovens & Geosynthetics S.A.	<b>999</b>	<b>113.5</b>
Thrace Polyfilms S.A.	<b>525</b>	<b>30.4</b>
Thrace Eurobent S.A.	<b>120</b>	<b>6.8</b>
Thrace Pack S.A.	<b>992</b>	<b>63.5</b>
Thrace Greenhouses S.A.	<b>294</b>	<b>4.9</b>
Don & Low Ltd	<b>534</b>	<b>61.9</b>
Thrace Synthetic Packaging Ltd	<b>319</b>	<b>14.2</b>
Thrace Ipoma	<b>549</b>	<b>24.8</b>
Thrace Greiner Packaging SRL	<b>380</b>	<b>17.3</b>
Lumite Inc	<b>436</b>	<b>24.8</b>
Thrace Polybulk AB & AS	<b>20</b>	<b>19.0</b>
Thrace Plastics Packaging DOO	<b>105</b>	<b>4.7</b>

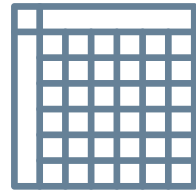
*Detailed information included in Tables 18 a, b, c (Appendix 1: Info tables)*



# APPENDICES OF DETAILED INFORMATION

1. Info tables
2. Consultation with stakeholders
3. Materiality analysis
4. Boundaries table
5. Disclosure data tables
6. Abbreviation list





# 1. Info tables

TABLE 1: RAW MATERIALS (TN)

	2021	2020	2019	Change 2021/2020
Polypropylene	90,365	89,060	89,760	1.5%
Polyethylene	10,830	12,898	10,151	-16.0%
Masterbatch (MB)	2,040	3,154	3,413	-35.3%
Packaging materials	6,690	6,692	6,864	0%
Polyester fibre	0	0	643.1	0%
<b>Total</b>	<b>109,925</b>	<b>111,804*</b>	<b>110,831*</b>	<b>-1.7%</b>

\*Data has been updated based on the latest information available

TABLE 2: RECYCLED RAW MATERIALS (TN)

	2021	2020	2019	Change 2021/2020
Recycled raw material**	11,443	6,783*	6,256	<b>68.7%</b>
Percentage of recycled raw material	10%	6%	6%	

\*Data has been updated based on the latest information available

\*\*Deriving from residue accruing from internal production processes and external sources

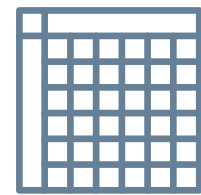
TABLE 3A: MANAGEMENT OF HAZARDOUS WASTE (TN)

Waste management method	Total weight of hazardous waste			Percentage		
	2021	2020	2019	2021	2020	2019
Recycling	196.63	209.98	205.93	92.4%	93.8%	94.3%
Incineration	16.13	13.78	12.49	7.6%	6.2%	5.7%
<b>Total</b>	<b>212.76</b>	<b>223.76</b>	<b>218.42</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

TABLE 3B: MANAGEMENT OF NON-HAZARDOUS WASTE (TN)

Waste management method	Total weight of non-hazardous waste			Percentage		
	2021	2020	2019	2021	2020	2019
Recycling	2,201.77	3,205.35	3,350.59	50.5%	52.3%	62.0%
Energy recovery	362.39	326.91	225.08	8.3%	5.3%	4.2%
Landfill disposal	1,794.97	2,595.89	1,824.22	41.2%	42.4%	33.8%
<b>Total</b>	<b>4,359.13</b>	<b>6,128.15</b>	<b>5,399.89</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>





# 1. Info tables

TABLE 3C: QUANTITIES OF WASTE PER TYPE AND COMPANY (TN)

Company	2021		2020		2019	
	Haz.	Non-haz.	Haz.	Non-haz.	Haz.	Non-haz.
Thrace Plastics Co S.A.*	0.00	0.00	0.00	0.00	0.00	0.00
Thrace Nonwovens & Geosynthetics S.A. & Thrace Polyfilms S.A.	22.42	1,105.56	22.86	2,260.48	26.54	1,035.00
Thrace Eurobent S.A.	0.00	178.19	0.00	258.51	0.00	386.55
Thrace Pack S.A.	40.64	629.14	49.36	524.69	39.30	407.91
Thrace Greenhouses S.A.	0.00	75.00	0.00	70.00	0.00	65.00
Don & Low Ltd	0.00	1,031.00	0.00	1,872.00	0.00	2,292.00
Thrace Synthetic Packaging Ltd	0.00	91.23	0.00	68.10	0.00	80.31
Thrace Ipoma S.A.	10.36	180.00	0.00	145.00	2.65	150.00
Thrace Greiner Packaging SRL	18.73	107.67	22.72	107.76	32.36	108.81
Lumite Inc.	120.61	961.34	128.82	821.61**	117.57	874.31
Thrace Polybulk AB & AS *	0.00	0.00	0.00	0.00	0.00	0.00
Thrace Plastics Packaging DOO*	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTAL</b>	<b>212.76</b>	<b>4,359.13</b>	<b>223.76</b>	<b>6,128.15</b>	<b>218.42</b>	<b>5,399.89</b>

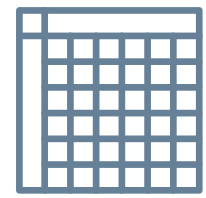
\*These companies have offices only and the collection of municipal solid waste is realized through the municipal waste management system

\*\* Data has been updated based on the latest information available

TABLE 4A: ENERGY CONSUMPTION PER TYPE AND SOURCE (MWH)\*

MWh	2021	2020	2019	2021/2020
<b>Electric energy</b>	162,981.91	153,123.17*	158,934.45	6.4%
<b>Thermal energy – District heating</b>	452.32	465.37	430.34	-2.8%
<b>Fuel</b>	39,058.68	24,793.47	27,924.73	57.5%
<b>Gasoline</b>	0.26	0.21	0.01	
<b>Natural gas</b>	37,334.46	22,612.02	26,073.81	
<b>Methane</b>	67.38	15.63	24.72	
<b>Liquid gas</b>	1,110.66	1,027.74	1,023.31	
<b>Petrol</b>	0.20	0.29	0.48	
<b>Heating pellets</b>	545.72	1,137.58	802.40	
<b>Total of non-renewable sources</b>	<b>202,492.91</b>	<b>178,382.01</b>	<b>187,289.52</b>	<b>13.5%</b>
<b>Geothermal energy</b>	7,353.82**	6,602.03**	6,583.04	11.4%
<b>Energy from photovoltaic use</b>	382.36	0	0	
<b>Total of renewable sources</b>	<b>7,736.18</b>	<b>6,602.03</b>	<b>6,583.04</b>	<b>17.2%</b>
<b>Total</b>	<b>210,229.09</b>	<b>184,984.04</b>	<b>193,872.56</b>	<b>13.7%</b>

\*For the calculation of electricity and fuel consumption, unit conversion factors (MJ, kWh, lt) from the DEFRA (Department for Environment, Food & Rural Affairs) methodology guide were used.



# 1. Info tables

TABLE 4B: ENERGY CONSUMPTION PER TYPE AND SOURCE (MJ)\*

	2021	2020	2019	2021/2020
<b>Electric energy</b>	586,734,876	551,243,412*	572,164,020	6.4%
<b>Thermal energy – District heating</b>	1,628,352	1,675,332	1,549,224	-2.8%
<b>Fuel</b>	140,611,248	89,256,492	100,529,028	57.5%
<b>Gasoline</b>	936	756	36	
<b>Natural gas</b>	134,404,056	81,403,272	93,865,716	
<b>Methane</b>	242,568	56,268	88,992	
<b>Liquid gas</b>	3,998,376	3,699,864	3,683,916	
<b>Petrol</b>	720	1,044	1,728	
<b>Heating pellets</b>	1,964,592	4,095,288	2,888,640	
<b>Total of non-renewable sources</b>	<b>728,974,476</b>	<b>642,175,236</b>	<b>674,242,272</b>	<b>13.5%</b>
<b>Geothermal energy</b>	26,473,752**	23,767,308**	23,698,944	11.4%
<b>Energy from photovoltaic use</b>	1,376,496	0	0	
<b>Total of renewable sources</b>	<b>27,850,248</b>	<b>23,767,308</b>	<b>23,698,944</b>	<b>17.2%</b>
<b>Total</b>	<b>756,824,724</b>	<b>665,942,544</b>	<b>697,941,216</b>	<b>13.7%</b>

\*For the calculation of electricity and fuel consumption, unit conversion factors (MJ, kWh, lt) from the DEFRA (Department for Environment, Food & Rural Affairs) methodology guide were used.

TABLE 4C: ENERGY CONSUMPTION PER TYPE AND SOURCE (%)

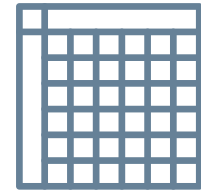
	2021	2020	2019
<b>Electric energy</b>	77.5%	82.8%	82.0%
<b>Thermal energy – District heating</b>	0.2%	0.3%	0.2%
<b>Fuel</b>	18.6%	13.4%	14.4%
<b>Total of non-renewable sources</b>	<b>96.3%</b>	<b>96.4%</b>	<b>96.6%</b>
<b>Geothermal energy</b>	3.5%	3.6%	3.4%
<b>Energy from photovoltaic use</b>	0.2%	0	0
<b>Total of renewable sources</b>	<b>3.7%</b>	<b>3.6%</b>	<b>3.4%</b>

\*In 2020, there was a revision on the way of calculating electric energy consumption.

\*\*Upon publication of the Annual Financial Report for 2021, the final data for the production of energy by Thrace Greenhouses in 2020-2021 was not available.

TABLE 5: ENERGY INTENSITY OF THE GROUP IN MWH/REVENUE (€ MIL.)

	2021	2020	2019
	466.9	542.6	587.9



# 1. Info tables

TABLE 6: DIRECT AND INDIRECT EMISSIONS (TCO<sub>2</sub>E)

Categories	tCO <sub>2</sub> e
<b>Direct emissions (Scope 1)</b>	5,676
<b>Indirect emissions (Scope 2)</b>	
<b>Location based</b>	100,169
<b>Market based</b>	65,963
<b>Indirect emissions related to the value chain (Scope 3)</b>	242,576
Business travel	564
Capital goods	7,423
Downstream transportation & distribution	5,127
Employee commuting	932
End-of-life processing	12,069
Fuel & energy related services	3,243
Purchased goods and services	172,656
Leased assets	133
Upstream transportation & distribution	39,552
Waste generated	877
<b>Total emissions (Market based)</b>	<b>348,421</b>
<b>Total emissions (Location based)</b>	<b>314,215</b>

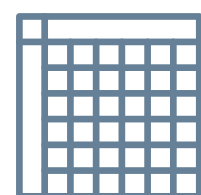
TABLE 7: INFORMATION ABOUT HUMAN RESOURCES

Total number of employees by type of employment contract

	2021			2020			2019			Change 2021/2020
	Men	Women	Total	Men	Women	Total	Men	Women	Total	
<b>Open-ended contract</b>	1,468	341	1,809	1,394	394	1,788	1,461	371	1,832	1%
<b>Fixed-term contract</b>	224	168	392	272	142	414	150	120	270	-5%
<b>Total</b>	<b>1,692</b>	<b>509</b>	<b>2,201</b>	<b>1,666</b>	<b>536</b>	<b>2,202</b>	<b>1,611</b>	<b>491</b>	<b>2,102</b>	<b>0%</b>

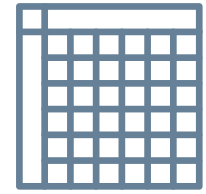
Total number of employees by job category

	2021			2020			2019			Change 2021/2020
	Men	Women	Total	Men	Women	Total	Men	Women	Total	
<b>Full-time</b>	1,688	496	2,184	1,661	509	2,170	1,607	474	2,081	1%
<b>Part-time</b>	4	13	17	5	27	32	4	17	21	-47%
<b>Total</b>	<b>1,692</b>	<b>509</b>	<b>2,201</b>	<b>1,666</b>	<b>536</b>	<b>2,202</b>	<b>1,611</b>	<b>491</b>	<b>2,102</b>	<b>0%</b>



# 1. Info tables

		2021			2020			2019		
Total number of employees by geographical area		Men	Women	Total	Men	Women	Total	Men	Women	Total
Greece	Open-ended	853	112	965	759	129	888	797	116	913
	Fixed-term	219	160	379	242	132	374	148	118	266
	<b>Total</b>	<b>1,072</b>	<b>272</b>	<b>1,344</b>	<b>1,001</b>	<b>261</b>	<b>1,262</b>	<b>945</b>	<b>234</b>	<b>1,179</b>
U.S.A.	Open-ended	108	49	157	105	46	151	113	48	161
	Fixed-term	2	5	7	5	2	7	2	1	3
	<b>Total</b>	<b>110</b>	<b>54</b>	<b>164</b>	<b>110</b>	<b>48</b>	<b>158</b>	<b>115</b>	<b>49</b>	<b>164</b>
Rumania	Open-ended	63	33	96	68	35	103	72	31	103
	Fixed-term	0	0	0	0	0	0	0	0	0
	<b>Total</b>	<b>63</b>	<b>33</b>	<b>96</b>	<b>68</b>	<b>35</b>	<b>103</b>	<b>72</b>	<b>31</b>	<b>103</b>
Norway	Open-ended	6	7	13	8	6	14	8	6	14
	Fixed-term	0	1	1	0	1	1	0	0	0
	<b>Total</b>	<b>6</b>	<b>8</b>	<b>14</b>	<b>8</b>	<b>7</b>	<b>15</b>	<b>8</b>	<b>6</b>	<b>14</b>
Scotland	Open-ended	294	69	363	298	72	370	339	102	441
	Fixed-term	2	1	3	25	5	30	0	0	0
	<b>Total</b>	<b>296</b>	<b>70</b>	<b>366</b>	<b>323</b>	<b>77</b>	<b>400</b>	<b>339</b>	<b>102</b>	<b>441</b>
Ireland	Open-ended	33	14	47	52	54	106	30	7	37
	Fixed-term	1	1	2	0	1	1	0	1	1
	<b>Total</b>	<b>34</b>	<b>15</b>	<b>49</b>	<b>52</b>	<b>55</b>	<b>107</b>	<b>30</b>	<b>8</b>	<b>38</b>
Serbia	Open-ended	5	3	8	4	3	7	4	4	8
	Fixed-term	0	0	0	0	0	0	0	0	0
	<b>Total</b>	<b>5</b>	<b>3</b>	<b>8</b>	<b>4</b>	<b>3</b>	<b>7</b>	<b>4</b>	<b>4</b>	<b>8</b>
Bulgaria	Open-ended	106	54	160	100	49	149	98	57	155
	Fixed-term	0	0	0	0	1	1	0	0	0
	<b>Total</b>	<b>106</b>	<b>54</b>	<b>160</b>	<b>100</b>	<b>50</b>	<b>150</b>	<b>98</b>	<b>57</b>	<b>155</b>
Total	Open-ended	1,468	341	1,809	1,394	394	1,788	1,461	371	1,832
	Fixed-term	224	168	392	272	142	414	150	120	270
	<b>Total</b>	<b>1,692</b>	<b>509</b>	<b>2,201</b>	<b>1,666</b>	<b>536</b>	<b>2,202</b>	<b>1,611</b>	<b>491</b>	<b>2,102</b>



# 1. Info tables

TABLE 8: PERSONNEL MOBILITY

	2021	2020	2019
<b>Voluntary mobility index*</b>	11%	11%	16%
<b>Involuntary mobility index*</b>	10%	10%	7%

\*The indices refer to the turnover rate of employees

TABLE 9: WOMEN WORKING IN THE GROUP

	2021	2020	2019
<b>Percentage of women</b>	23.1%	25.1%	22.7%
<b>Percentage of women in managerial positions</b>	18.0%	20.0%	22.0%
<b>Percentage of women in the Board of Directors</b>	18.2%*	-	-

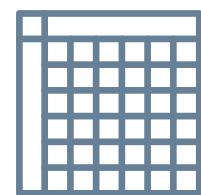
\*Fulfilling, though, the criteria of adequate gender representation in the board of directors, as stipulated in article 3 of law 4706/2020

TABLE 10: PROPORTION INDEX OF BASIC SALARY

	2021	2020	2019
<b>Average salary of men</b>	25.164	23.867	25.508
<b>Average salary of women</b>	19.285	19.643	19.514
<b>Total salary proportion</b>	<b>23,4%</b>	<b>17,7%</b>	<b>23,5%</b>

TABLE 11A: AVERAGE TRAINING HOURS BY LEVEL

Level	2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
<b>Senior management</b>	7.1	5.4	6.7	4.2	1.3	3.3	3.9	7.1	4.6
<b>Middle management</b>	12.1	11.2	11.8	7.9	7.9	7.9	4.7	4.3	4.6
<b>Other employees</b>	5.4	3.5	5.0	1.2	1.0	1.2	2.6	2.1	2.5
<b>Total</b>	<b>5.7</b>	<b>4.0</b>	<b>5.3</b>	<b>1.4</b>	<b>1.6</b>	<b>1.5</b>	<b>2.8</b>	<b>2.4</b>	<b>2.7</b>



# 1. Info tables

TABLE 11B: AVERAGE TRAINING HOURS BY GENDER AND FUNCTION

	2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Offices	20.8	10.4	17.0	4.8	6.1	5.3	3.5	6.2	4.4
Production	2.7	2.9	2.7	1.2	0.4	1.1	2.4	1.1	2.1
Other category 1**	9.5	0.1	4.7	0.7	0.1	0.4	10.7	6.1	9.8
Other category 2**	3.3	8.0	3.7	1.6	0.0	1.3	4.4	0.0	3.8
<b>Total</b>	<b>5.7</b>	<b>4.0</b>	<b>5.3</b>	<b>1.4</b>	<b>1.6</b>	<b>1.5</b>	<b>2.8</b>	<b>2.3</b>	<b>2.7</b>

\*Data has been updated based on the latest information available

\*\*Category 1 refers to Maintenance Department and category 2 to Logistics Department

TABLE 12: AVERAGE TRAINING HOURS BY GRADE

	2021			2020			2019		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Average hours of training (10% of higher paid employees)	5.2	4.1	5.1	3.7	8.0	4.2	2.1	3.2	2.3
Average hours of training (90% of lower paid employees)	5.8	4.1	5.4	1.4	1.5	1.4	3.0	2.3	2.9

\*Data has been updated based on the latest information available

TABLE 13: OCCUPATIONAL INJURIES

Occupational injuries	Employees			Collaborators		
	2021	2020*	2019*	2021	2020	2019
Number of fatalities due to injury	0	0	0	0	0	0
Fatality rate due to injury	0	0	0	0	0	0
Number of accidents with severe consequences	0	0	1	0	0	0
Rate of accidents with severe consequences	0	0	0.05	0	0	0
Number of confirmed injuries	49	33	45	4	0	2
Frequency rate of confirmed injuries**	2.7	1.8	2.3	10.5	0	7.8
Injury severity rate***	38.6	21.3	19.2	0	0	0
Number of days lost due to injury	708	398	369	0	0	0
Number of man-hours	3,662,962	3,719,228	3,841,537	76,161	67,323	51,527

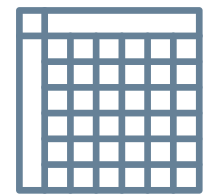
\*Data has been updated based on the latest information available

\*\*The rate equals the number of recorded injuries\*200,000 divided by the number of man-hours of all employees during a calendar year

\*\*\*The rate equals the number of working days lost due to occupational injuries\*200,000 divided by the number of man-hours of all employees during a calendar year

TABLE 14: OCCUPATIONAL DISEASES

Occupational diseases	Employees			Collaborators		
	2021	2020	2019	2021	2020	2019
Number of fatalities due to disease	0	0	0	0	0	0
Number of confirmed diseases	0	0	0	0	0	0



# 1. Info tables

TABLE 15: DIRECT ECONOMIC VALUE PRODUCED & DISTRIBUTED (€ MIL.)

	2021	2020	2019*
<b>Revenues</b>	<b>430.042</b>	<b>340.891</b>	<b>329.776</b>
<b>Operating Costs</b>	284.191	227.245	256.794
<b>Employee Salaries &amp; Allowances</b>	58.544	53.900	57.381
<b>Payments to Funding Bodies</b>	8.996	7.725	6.004
<b>Payments/Contributions to the State</b>	15.826	10.316	3.966
<b>Investments in Society</b>	0.380	0.329	0.273
<b>Directly distributable economic value</b>	<b>367.937</b>	<b>299.515</b>	<b>324.418</b>
<b>Non-distributable economic value**</b>	<b>62.105</b>	<b>41.376**</b>	<b>5.358</b>

\*The financial data for 2019 has been readjusted due to the sale of Thrace Linq; however, the present report does not illustrate the related readjustment (more information available in the financial statements of Thrace Group).

\*\*The difference in the non-distributable economic value that accrued in 2020 in comparison with the previous years is mainly due to the increased profitability of the Group

TABLE 16: BALANCE SHEET COMPONENTS (€ MIL.)

	2021	2020*	2019
<b>Assets</b>	405.2	341.9	323.3
<b>Owners' Equity</b>	252.3	176.1	146.3
<b>Total Liabilities</b>	152.9	165.8	177.0
<b>Sales</b>	428.4	339.7	298.3

\*Data has been updated based on the latest information available

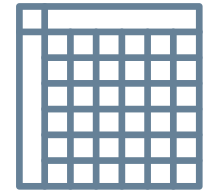
TABLE 17: SHAREHOLDERS

Shareholders	Number of shares	Holding percentage
<b>Konstantinos Halioris</b>	18,936,558	43.3%
<b>Efimia Haliori</b>	9,120,690	20.9%
<b>Institutional investors</b>	5,996,483	13.7%
<b>Thrace Plastics Co S.A.</b>	538,518	1.2%
<b>Others</b>	9,149,203	20.9%
<b>Total</b>	<b>43,741,452</b>	<b>100%</b>

TABLE 18A: TOTAL NUMBER OF SUPPLIERS\*

	2021	2020	2019
<b>Thrace Plastics Co S.A.</b>	175	131	137
<b>Thrace Nonwovens &amp; Geosynthetics S.A.</b>	999	874	882
<b>Thrace Polyfilms S.A.</b>	525	518	452
<b>Thrace Eurobent S.A.</b>	120	136	115
<b>Thrace Pack S.A.</b>	992	913	889
<b>Thrace Greenhouses S.A.</b>	294	322	321
<b>Don &amp; Low Ltd</b>	534	526	826
<b>Thrace Synthetic Packaging Ltd</b>	319	272	300
<b>Thrace Ipoma S.A.</b>	549	586	716
<b>Thrace Greiner Packaging SRL</b>	380	409	409
<b>Lumite Inc</b>	436	413	394
<b>Thrace Polybulk AB &amp; AS</b>	20	20	20
<b>Thrace Plastics Packaging DOO</b>	<b>105</b>	<b>95</b>	<b>101</b>

\*Some companies of the Group use other companies of the Group as suppliers, which have been included in the above figures



## 1. Info tables

TABLE 18B: ESTIMATED MONETARY VALUE OF TOTAL PAYMENTS TO SUPPLIERS (€ MIL.)

	2021	2020	2019
Thrace Plastics Co S.A.	3.9	2.9	2.6
Thrace Nonwovens & Geosynthetics S.A.	113.5	86.0	87.0
Thrace Polyfilms S.A.	30.4	26.0	20.0
Thrace Eurobent S.A.	6.8	5.0	5.4
Thrace Pack S.A.	63.5	51.5	45.9
Thrace Greenhouses S.A.	4.9	5.1	5.3
Don & Low Ltd	61.9	58.0	57.0
Thrace Synthetic Packaging Ltd	14.2	13.3	9.0
Thrace Ipoma S.A.	24.8	16.5	21.0
Thrace Greiner Packaging SRL	17.3	12.8	14.9
Lumite Inc	24.8	15.8	16.7
Thrace Polybulk AB & AS	19.0	21.4	23.2
Thrace Plastics Packaging DOO	4.7	4.2	3.1

TABLE 18C: PERCENTAGE OF EXPENDITURE ON LOCAL SUPPLIERS

	2021	2020	2019
Thrace Plastics Co S.A.	94%	93%	87%
Thrace Nonwovens & Geosynthetics S.A.	78%	77%	78%
Thrace Polyfilms S.A.	66%	67%	61%
Thrace Eurobent S.A.	49%	59%	67%
Thrace Pack S.A.	81%	79%	72%
Thrace Greenhouses S.A.	99%	98%	99%
Don & Low Ltd	64%	77%	84%
Thrace Synthetic Packaging Ltd	The main suppliers are other companies of the Group		
Thrace Ipoma S.A.	55%	58%	53%
Thrace Greiner Packaging SRL	25%	26%	22%
Lumite Inc	65%	66%	73%
Thrace Polybulk AB & AS	3%	1%	5%
Thrace Plastics Packaging DOO	<b>23%</b>	<b>22%</b>	<b>24%</b>

\*The information has been updated based on the latest available data





## 2. Consultation with stakeholders

[GRI: 102-40, 102-42, 102-43, 102-44, ATHEX ESG: C-S1]

Main groups of stakeholders	Type of communication & consultation	Frequency of communication	Main topics of interest
Shareholders	Via email, over the phone, in person	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Creation of economic value and financial performance of the Group</li> <li>• Assurance of employee health, safety and wellbeing</li> <li>• Defence of human rights at work</li> <li>• Responsible corporate governance and assurance of business ethics and compliance</li> <li>• Assurance of business continuity and preparedness for emergency response</li> </ul>
Board of Directors	Via email, over the phone, in person	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Creation of economic value and financial performance of the Group</li> <li>• Assurance of employee health, safety and wellbeing</li> <li>• Defence of human rights at work</li> <li>• Responsible corporate governance and assurance of business ethics and compliance</li> <li>• Assurance of business continuity and preparedness for emergency response</li> <li>• Reduction of greenhouse gas emissions</li> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Assurance of product quality and customer health and safety</li> </ul>
Employees	Via email, over the phone, in person	On a daily basis	<ul style="list-style-type: none"> <li>• Creation and safeguarding of employment</li> <li>• Assurance of employee health, safety and wellbeing</li> <li>• Defence of human rights at work</li> </ul>
Clients (B2B)	Via email, over the phone, in person	On a daily basis	<ul style="list-style-type: none"> <li>• Reduction of greenhouse gas emissions</li> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Assurance of product quality and customer health and safety</li> <li>• Assurance of business continuity and preparedness for emergency response</li> </ul>
Suppliers / Partners	Via email, over the phone, in person	On a daily basis	<ul style="list-style-type: none"> <li>• Creation of economic value and financial performance of the Group</li> <li>• Assurance of employee health, safety and wellbeing</li> </ul>
State & Local Authorities	Via email, over the phone, in person	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Minimization of waste and maximization of reprocessing and recycling opportunities</li> </ul>
NGOs	Events	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Reduction of greenhouse gas emissions</li> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Minimization of waste and maximization of reprocessing and recycling opportunities</li> <li>• Reduction in water consumption</li> <li>• Protection and maintenance of biodiversity</li> </ul>
Media	Via email, over the phone	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Assurance of product quality</li> <li>• Creation and safeguarding of employment</li> <li>• Support of the local community and maintenance of active participation and collaboration</li> </ul>
Business associations	Via email, over the phone, in person	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Assurance of product quality and customer health and safety</li> <li>• Assurance of employee health, safety and wellbeing</li> </ul>
Investment community	Via email, over the phone, in person	On an ad hoc basis	<ul style="list-style-type: none"> <li>• Provision of innovative and sustainable products within the framework of circular economy</li> <li>• Creation of economic value and financial performance of the Group</li> <li>• Responsible corporate governance and assurance of business ethics and compliance</li> </ul>



## 3. Materiality analysis [GRI: 102-49, ATHEX ESG: C-G3]

### Stage 1: Identification of sustainable development topics

Topics related to the activities and stakeholders of the Group were identified, which came up by reviewing the following among other things:

- Policies, regulations and procedures of the Group
- Publications related to the industry and the Group
- UN Sustainable Development Goals
- GRI publications
- International standards

### Stage 2: Specification of the prioritization criteria

The criteria for the prioritization of the topics identified were specified, which were:

- The degree to which these topics significantly affect the assessments and decisions of the stakeholders in relation to the Group.
- The degree to which these topics reflect the broader impact (both positive and negative) of the operation of the Group on the economy, society and the environment.

### Stage 3: Prioritization of the topics of sustainable development

The above criteria were incorporated into respective questionnaires, which were completed by Group executives and external stakeholders in order to prioritize the topics identified.

### Stage 4: Validation of the results

The results were validated by the Sustainability Committee of the Group and, thus, the following material topics were identified, which are also illustrated on the materiality map below:

1. Improvement of energy efficiency
- 2. Reduction of greenhouse gas emissions**
3. Identification of financial and operational risks and opportunities deriving from the climate change
- 4. Provision of innovative and sustainable products within the framework of circular economy**
- 5. Minimization of waste and maximization of reprocessing and recycling opportunities**
6. Reduction of water consumption
7. Protection and conservation of biodiversity
- 8. Creation of economic value and economic performance of the Group**
- 9. Assurance of product quality and customer health and safety**
10. Promotion of data transparency about products and customer information
- 11. Creation and safeguarding of employment**
12. Continuous employee training and development
- 13. Assurance of employee health, safety and wellbeing**

### Stage 4: Validation of the results

#### 14. Defence of human rights at work

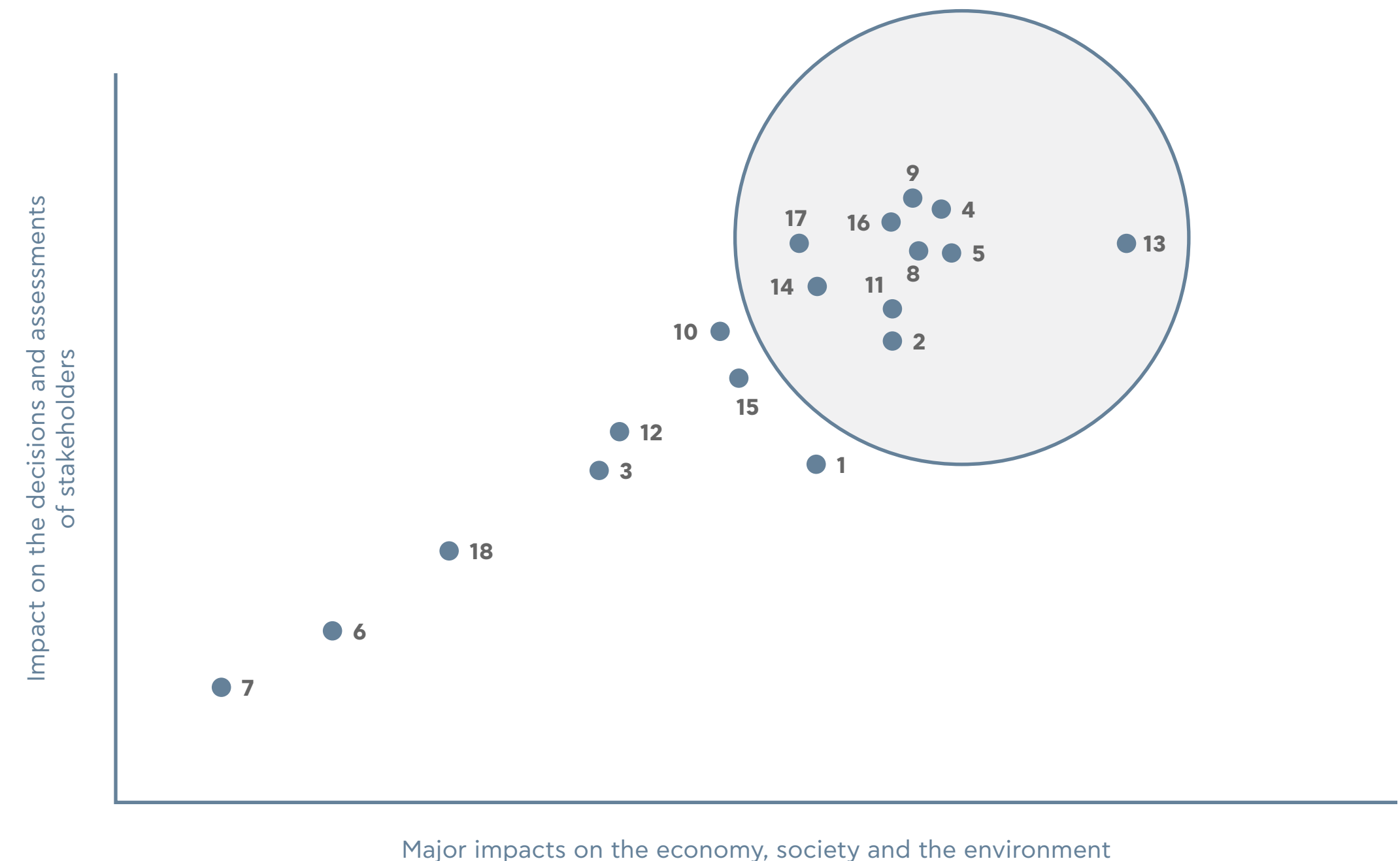
15. Support of the local community and maintenance of active participation and collaboration

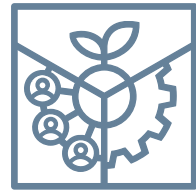
#### 16. Responsible corporate governance and assurance of business ethics and compliance

#### 17. Assurance of business continuity and preparedness for emergency response

18. Assessment of suppliers in terms of their social and environmental performance














## MATERIALITY MAP





## 4. Boundaries table

[GRI: 102-42, 102-43, 102-44, 102-46, 102-47, 103-1]

Material topic	1. Why is this topic considered as material		2. Limits of influence	
	Broader economic, social and environmental impact caused by this topic	Stakeholders directly affected by this topic	Influence by the Group	Stakeholders outside the Group that might cause or be associated with the impact of this topic
Provision of innovative & sustainable products within the framework of circular economy	 	<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> <li>State &amp; Local Authorities</li> <li>Local &amp; Wider Society</li> <li>Business associations</li> <li>Investment Community</li> </ul>
Minimization of waste and maximization of reprocessing and recycling opportunities		<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> <li>State &amp; Local Authorities</li> <li>Local &amp; Wider Society</li> <li>Business associations</li> <li>Investment Community</li> </ul>
Reduction of greenhouse gas emissions	 	<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> <li>State &amp; Local Authorities</li> <li>Business associations</li> <li>Investment Community</li> </ul>
Creation and safeguarding of employment	  	<ul style="list-style-type: none"> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> </ul>
Defence of human rights at work	  	<ul style="list-style-type: none"> <li>Employees</li> <li>Suppliers/Partners</li> <li>Business associations</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> </ul>
Assurance of employee health, safety & wellbeing		<ul style="list-style-type: none"> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> </ul>
Assurance of product quality and customer health & safety		<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Clients</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> </ul>
Creation of economic value and financial performance of the Group		<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> </ul>
Responsible corporate governance and assurance of business ethics & compliance		<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> <li>State &amp; Local Authorities</li> <li>Business associations</li> <li>Investment Community</li> </ul>
Assurance of business continuity and preparedness for emergency response		<ul style="list-style-type: none"> <li>Shareholders</li> <li>Employees</li> <li>Clients</li> <li>Suppliers/Partners</li> </ul>	✓	<ul style="list-style-type: none"> <li>Customers</li> <li>Suppliers/Partners</li> </ul>



## 5. Disclosure data tables

### 5.1 GRI CONTENT INDEX

[GRI: 102-55]

GRI Standard	Disclosure	Page / Citation	Omission
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	102-2 Activities, brands, products and services	11-15	
	102-3 Location of headquarters	10	
	102-4 Location of operations	10-15	
	102-5 Ownership and legal form	11	
	102-6 Markets served	8, 10-15	
	102-7 Scale of the organization	8, 10, 43, 56, 58, 76-78	
	102-8 Information on employees and other workers	43, 76-77	
<b>GRI 102: General Standard Disclosures 2016</b>	102-9 Supply chain	68, 70, 79-80	
	102-10 Significant changes in the organization and its supply chain	11	
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<b>GRI 102: General Standard Disclosures 2016</b>	102-48 Restatements of information		Wherever there are restatements of information in comparison to the report published the previous year, related footnotes appear.
	102-49 Changes in reporting	6, 21-22	
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	102-51 Date of most recent report	6	
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## 5. Disclosure data tables

<b>GRI 102: General Standard Disclosures 2016</b>	102-56 External assurance	6
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### MATERIAL TOPICS

#### Provision of innovative and sustainable products within the framework of circular economy

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	24-27
	103-3 Evaluation of the management approach	27, 72
<b>GRI 301: Materials 2016</b>	301-1 Materials used by weight or volume	27, 72
	301-2 Recycled input materials used	27, 72

#### Minimization of waste and maximization of reprocessing and recycling opportunities

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	29
	103-3 Evaluation of the management approach	30, 72-73
<b>GRI 306: Waste 2020</b>	306-1 Waste generation and significant waste-related impacts	29
	306-2 Management of significant waste-related impacts	29
	306-3 Waste generated	30, 72-73

<b>THR: Internal index</b>	Participation of collaborators in the platform IN THE LOOP	31-32
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#### Reduction of greenhouse gas emissions

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	33-34
	103-3 Evaluation of the management approach	35-38, 74-75
<b>GRI 302: Energy 2016</b>	302-1: Energy consumption within the organization	35, 73-74
	302-3 Energy intensity	36, 74
<b>GRI 305: Emissions 2016</b>	305-1 Direct (Scope 1) GHG emissions	37, 75
	305-2 Energy indirect (Scope 2) GHG emissions	37, 75
	305-3 Other indirect (Scope 3) GHG emissions	37, 75
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#### Creation and safeguarding of employment

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	40-41
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<b>GRI 404: Training and Education 2016</b>	404-1 Average hours of training per year per employee	45, 48

#### Defence of human rights at work

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	46



## 5. Disclosure data tables

<b>GRI 103: Management Approach 2016</b>	103-3 Evaluation of the management approach	46
<b>GRI 406: Non-discrimination 2016</b>	406-1 Incidents of discrimination and corrective actions taken	46
<b>Assurance of employee health, safety and wellbeing</b>		
<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	47-49
	103-3 Evaluation of the management approach	49, 78
<b>GRI 403: Occupational Health and Safety 2018</b>	403-1 Occupational health and safety management system	47-48
	403-2 Hazard identification, risk assessment and incident investigation	47-48
	403-3 Occupational health services	47-48
	403-4 Worker participation, consultation and communication on occupational health and safety	47-48
	403-5 Worker training on occupational health and safety	47-48
	403-6 Promotion of worker health	47-48
	403-7 Prevention and mitigation of occupational health and safety impacts	47-48
<b>GRI 403: Occupational Health and Safety Topic-specific Disclosures 2018</b>	403-9 Work-related injuries	49, 78
	403-10 Work-related ill health	49, 78

### Assurance of product quality and customer health & safety

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	50-51
	103-3 Evaluation of the management approach	51
<b>GRI 416: Customer Health and Safety 2016</b>	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	51

### Creation of economic value and economic performance of the Group

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	56
	103-3 Evaluation of the management approach	56, 78
<b>GRI 201: Economic Performance 2016</b>	205-3 Confirmed incidents of corruption and action taken	56, 78

### Responsible corporate governance and assurance of business ethics and compliance

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	59-63
	103-3 Evaluation of the management approach	63
<b>GRI 205: Anti-Corruption 2016</b>	205-3 Confirmed incidents of corruption and action taken	63



## 5. Disclosure data tables

### Assurance of business continuity and preparedness for emergency response

<b>GRI 103: Management Approach 2016</b>	103-1 Explanation of the material topic and its boundaries	83
	103-2 The management approach and its components	64-67
	103-3 Evaluation of the management approach	67
<b>THR: Internal index</b>	Incidents of breach of the UK Modern Slavery Act 2015	69

### 5.2 SASB INDEX TABLE

Topic	Code	Index	Page/Citation	Comments
<b>Chemicals</b>				
<b>Greenhouse gas emissions</b>	RT-CH-110a.1	Gross global Scope 1 emissions, percentage covered under emissions-limiting regulations	37, 75	
	RT-CH-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emission reduction targets and an analysis of performance against those targets	33-34	
<b>Energy Management</b>	RT-CH-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable, (4) total self-generated energy	35, 73-74	
<b>Hazardous waste management</b>	RT-CH-150a.1	Amount of hazardous waste generated, percentage recycled	30, 72	

<b>Workforce health and safety</b>	RT-CH-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for (a) direct employees (b) contract employees	49, 78
	RT-CH-320a.2	Description of efforts to assess, monitor and reduce exposure of employees and contract workers to long-term (chronic) health risks	47-49

### Containers & Packaging

<b>Greenhouse gas emissions</b>	RT0204-01	Total global Scope 1 emissions, percentage covered under emissions-limiting regulations	37, 75
	RT0204-02	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emission reduction targets and an analysis of performance against those targets	33-34
<b>Energy management</b>	RT0204-04	Total energy consumed, percentage grid electricity, percentage renewable	35, 73-74
<b>Waste management</b>	RT0204-07	Amount of waste generated through production, percentage hazardous, percentage recycled	30, 72
<b>Product safety</b>	RT0204-08	Number of recalls issued, total units recalled	51
	RT0204-09	Discussion for the procedure of identification and management of hazardous materials and chemical substances	24-26
<b>Product lifecycle management</b>	RT0204-12	Description of the strategies for the reduction of the environmental impact of packaging throughout the lifecycle of products	24-26



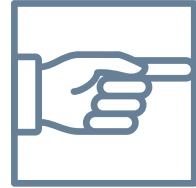
## 5. Disclosure data tables

### 5.3 ESG METRIC TABLE BY THE ATHENS STOCK EXCHANGE (2022)

ESG classification	ID	Metric title	Page / Citation	Omission
<b>Core metrics</b>				
<b>Environment</b>	C-E1	Scope 1 emissions	37-38, 75	
	C-E2	Scope 2 emissions	37-38, 75	
	C-E3	Energy consumption and production	35, 73-74	
<b>Society</b>	C-S1	Stakeholder engagement	81	
	C-S2	Female employees	44, 77	
	C-S3	Female employees in management positions	44, 77	
	C-S4	Employee turnover	44, 77	
	C-S5	Employee training	45, 78	
	C-S6	Human rights policy	46, 69	
	C-S7	Collective bargaining agreements	42, 75	
	C-S8	Supplier assessment	68	
<b>Corporate governance</b>	C-G1	Board composition	60-61	
	C-G2	Sustainability oversight	20	
	C-G3	Materiality	21-22	
	C-G4	Sustainability policy	19-20	
	C-G5	Business ethics policy	62	
		Data security policy	46	
<b>Advanced metrics</b>				
<b>Environment</b>	A-E1	Scope 3 emissions	37-38, 75	

<b>Environment</b>	A-E2	Climate change risks and opportunities	64-66
	A-E3	Waste management	30, 72
	A-E5	Biodiversity sensitive areas	28
<b>Society</b>	A-S1	Sustainable economic activity	58
	A-S3	Gender pay gap	44, 77
<b>Corporate governance</b>	A-G1	Business model	9, 11-15, 24-26
	A-G2	Business ethics violations	63
	A-G3	ESG targets	20
	A-G4	Variable pay	40
	A-G5	External assurance	6
<b>Sector-specific metrics</b>			
<b>Environment</b>	SS-E1	Emission strategy	33, 37
	SS-E4	Water management	28
	SS-E5	Environmental impact of packaging	24, 50-51
	SS-E7	Critical materials	24-25
<b>Society</b>	SS-E8	Chemicals in products	29
	SS-S1	Product quality and safety	50-51
<b>Corporate governance</b>	SS-S6	Health and safety performance	49, 78
	SS-G1	Whistleblower policy	46





## 6. Abbreviation list

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

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