Creating value for society and the environment

SUSTAINABLE DEVELOPMENT REPORT 2020







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PAGE 20 PRODUCT

- Provision of innovative and sustainable products in the context of the circular economy
- Reduction of waste and maximization of reprocessing and recycling opportunities
- Reduction of greenhouse gas emissions
- IN THE LOOP platform

PEOPLE

- Creating and securing of employment
- Defending of human rights at work
- Ensuring the health, safety and well-being of employees
- Ensuring the quality, health and safety of customers
- Management of supply chain
- Support of local communities and maintenance of active participation and collaboration

PROCESS

- Creation of financial value and financial performance of the Group
- Responsible corporate governance and assurance of business ethics and compliance
- Assurance of business continuity and preparedness for emergency response
- What's next

INFORMATION AND INDEX TABLES

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Turning challenges into opportunities



INTRODUCTION

Message from the Chairman Message from the CEO About this Report How to read this Report 2020 in numbers



INTRODUCTION Message from the Chairman [GRI: 102-10. 102-14]



Constantinos Halioris

While striving towards a sustainable future, we set ambitious goals that are always in line with our business model.



e are pleased to present the 3rd Sustainable V Development Report of Thrace Group. In 2020, the Group managed to meet to its commitments and create significant value for all its stakeholders, despite the unprecedented challenges related to the global pandemic. Our vision, mission and values, along with the determination and exceptional dedication of our employees and customers have been the driving forces behind our achievements.

The health, safety and wellbeing of our people is our main priority. At the same time, we have adapted our practices and working methods to safeguard our business continuity and thus keep responding to the needs of our clients in a reliable way.

One of our non-negotiable values is the enhancement of the circular economy model that we are applying. In this context, we continued implementing practices based on the principles of reduction, reuse and recycling, so as to constantly limit our environmental footprint by

minimizing the use of natural resources throughout our production process, by promoting the use of recyclable materials and by improving the ecological design of our products.

In our attempt to adapt to the impact of climate change and achieve positive results for the Group, society and the environment, we aimed at developing our business strategy in a way that addresses the economic impacts of climate change. Meanwhile, we are planning to impliment specific actions that will help us further reduce our environmental footprint.

While striving towards a sustainable future, we set ambitious goals that are always in line with our business model. We are sure that we will fulfil them, as throughout this challenging course, we have all of you - our people, our partners, our customers - by our side.







INTRODUCTION Message from the CEO



Dimitris Malamos

 The pandemic served as a trend accelerator, demonstrating that the swift adaptation to external conditions is critical for our business success.



t is a great pleasure for us, at Thrace Group, to share with you our sustainable development initiatives and the results we achieved in 2020, which stem from the strategy and culture that we have been building over several years. 2020 has been an important year for the Group, characterized by a particularly positive financial performance and a high capitalization rate of our production capacity in all of our facilities. The pandemic served as a trend accelerator, demonstrating that the swift adaptation to external conditions is critical for our business success.

The transition from a linear to a circular economy model, the sustainable utilization of raw materials and climate change are the main challenges that all the companies of the Group are being faced with. We are always a step ahead of the ever-changing needs and developments. In this context and in line with our critical role in the production of plastic products, we support the updated strategy of the European Union regarding industrial policies and we adopt its action plan for the transition to the circular economy and the reduction of the carbon footprint. Planning the sustainable future of our Group, we put our people first. The continuous investment in human resources is an integral part of our culture and philosophy. The health, safety and quality of life of our employees also constitute a basic prerequisite for the sustainable development of the Group. In this unprecedented social crisis affecting the globe, we seek to assist and support vulnerable groups, thus serving as a strong link of social contribution. We are proud of having proceeded with a remarkable donation of 2,000,000 certified disposable surgical masks to help vulnerable groups across the country, as well as undertaking social initiatives through the Social Centre "Stravros Halioris".

At Thrace Group, we remain consistent and focused on our goals, we are strengthening our position in the market and we continue to invest in sustainable development and in our continuous growth. As the pandemic evolves, we feel stronger and more prepared to maneuver in a business environment that presents big challenges, but also great opportunities.



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

Through our Sustainable **Development Strategy**, we aim at creating value for society and the environment.

The present Report refers to the year 2020 and is the 3rd Sustainable Development Report of Thrace Group. It illustrates our approach and performance on important sustainability issues that affect the future of the Group and mainly aims to inform stakeholders on our financial, social and environmental impact. The Report follows the internationally approved standard GRI (Global Reporting Initiative): Core Selection*, the UN Sustainable Development Goals, and the ESG 2019 Reporting Guide of the Athens Stock Exchange, in compliance with selected basic, advanced, and sector-specific metrics. It was prepared in collaboration with the Climate Change and Sustainable Development Services department of EY Greece and has not received external verification. The term "Group" refers to Thrace Group, while the term "subsidiaries" and/or "companies" refers to the companies described on the table on page 14.

Sustainability for us is a polymer collaboration

The goal of our Sustainable Strategy is to create value for society and the environment. To achieve this, we all need to cooperate. Our executives, our employees in the factories where our products are being designed and manufactured, our suppliers and customers all understand the meaning and importance of Sustainable Development for our lives and for the future of the planet. Moreover, this concept is now woven directly into in our corporate culture. Driven by a strong corporate governance and a mindset focused on sustainability, we can ensure the business continuity of our Group and our shared future.



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

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as specified in collaboration with the stakeholders of the Group.













age **8**













-1-1-1 A Greek group with international presence



THE GROUP

Our vision, mission and values Our local and international presence Our history Our business sectors Participations and awards





Our vision, mission and values

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

Vision

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



Mission

- Closely adhere to the core values of the Group: integrity, effectiveness, innovation, flexibility, responsiveness, collaboration, leadership.
- Invest in our people, by encouraging lifelong learning, individuality, initiatives and personal achievement.
- Set new business standards through innovation and pioneer-style thinking, thus helping our customers become the leaders in their markets.
- Provide not just single products, but complete and innovative solutions that can adapt to the specific requirements and needs of our customers.
- Operate on both a local and global level, thus serving thousands of companies worldwide through our strategic geographic dispersion.
- Pursue profitability through organic growth and strategic acquisitions.
- Achieve competitive prices through economies of scale, vertical integration and internal synergies.
- Combine diverse high-end technologies with our extensive know-how and experience in the markets where we are operating.
- Respect the environment and the societies where we are working and living.
- Adapt to the ever-changing market conditions and promptly adjust our practices so that we can successfully respond to the global trends shaping the future of business, economy and society.





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







THE GROUP Our local and international presence

[GRI: 102-1, 102-2, 102-3, 102-4, 102-5]







Thrace Plastics S.A. was founded in 1977 in Magiko, in the municipality of Avdera, Xanthi to become, shortly after its establishment, one of the biggest producers of technical fabrics and packaging solutions in the world.

Following the internal restructuring of the Group at the end of 2017, the parent company Thrace Plastics S.A. has been operating as a holding company under the name Thrace Plastics Co S.A. Thrace Group is a multinational group of companies specialising in the production and distribution of polypropylene products, featuring production facilities in six countries, namely Greece, UK, Ireland, Bulgaria, Romania and USA. The Group has distribution and trading companies in three countries: Norway, Sweden and Serbia. The sales network of the Groups covers 80 countries.





[GRI: 102-1, 102-2, 102-3, 102-4, 102-5, 102-7, 102-45]



Production facilities in 6 countries



Distribution and trading companies in 3 countries



Sales network in 80 countries



Thrace Group consists of the following companies:

Companies*	Headquarters
Thrace Plastics Co S.A.	Xanthi, Greece
Thrace Nonwovens & Geosynthetics S.A.	Xanthi, Greece
Thrace Polyfilms S.A.	Xanthi, Greece
Thrace Eurobent S.A.	Xanthi, Greece
Thrace Plastics Pack S.A.	Ioannina (branch in Xanthi), Greece
Thrace Greenhouses S.A.	Xanthi, Greece
Thrace Synthetic Packaging Ltd.	Clara, Ireland
Thrace Ipoma A.D.	Sofia, Bulgaria
Thrace Polybulk AS	Brevik, Norway
Thrace Polybulk AB	Köping, Sweden
Thrace Greiner Packaging S.R.L.	Sibiu, Romania
Lumite Inc.	Georgia, USA
Don & Low Ltd	Forfar, Scotland
Thrace Plastics Packaging DOO	Nova Pazova, Serbia

*The companies Thrace Eurobent S.A., Thrace Greenhouses S.A., Thrace Greiner Packaging S.R.L. and Lumite Inc. are joint ventures of Thrace Group; however, all four are included in the Report in their entirety (100%) as they are applying the Sustainable Development principles and values of the Group. The above table includes companies of an active trading or production status.



THE GROUP **Our history**

[GRI: 102-10]



1977

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

1980

1st factory for woven polypropylene bags, ropes & twines in Greece and abroad.

1986

2nd factory for the production of PP technical fabrics in Xanthi.

1992

3rd factory for the production of industrial yarns and carpet yarns in Xanthi.

1995

Enlistment in the Athens Stock Exchange.

1997

4th factory for rigid packaging in Ioannina

1999

Acquisition of **Don & Low Ltd** (Scotland) and involvement in the nonwovens industry.

2000

Acquisition of **Thrace Polybulk** (Norway) and entry into the FIBC/Big Bag industry.



66

2000-2006

Acquisition of Thrace Ipoma (Bulgaria) and foundation of Thrace Greiner (joint venture by 50% in Romania) & Thrace Plastics Pack Doo (Serbia). Two new production lines are added in Xanthi, for spunbond and needle-punched nonwoven fabrics respectively.

2007

Thrace Group expands its activities to North America through the acquisition of **Thrace LINQ Inc.** by 100% & Lumite Inc. by 50%.

2009

Investment in a **new production line** for nonwoven needle-punched fabrics in North America (Thrace LINQ).

2010-2012

Q

Remodelling of operations & new organizational structure to enhance the growth of the Group within the framework of the global financial recession. The companies of the Group expand their sales network over 80 countries.

2012

the Asian market.

2013

Establishment of the company Thrace Greenhouses S.A., operating greenhouses for tomato production with the method of hydroponic cultivation and the use of geothermal energy.



A new trading company is established in China in order to penetrate



) B

2014

The Group enters the market of waterproofing products with Geosynthetic Clay Liners (GCL) through the establishment of Thrace Eurobent S.A. in Xanthi (joint venture by 51%).

2016

Two new production lines of needle-punched nonwoven and spunbond fabrics in Greece (Thrace NG). Initiation of thermoforming production in Bulgaria (Thrace Ipoma).

2017

Initiation of injection production in Ireland (Thrace Synthetic).

2018

New production line of needle-punched nonwoven fabrics in North America (Thrace LINQ). Expansion of Thrace Greenhouses by 11 acres, reaching a total of 46 acres.

2019

Continuation of the internal restructuring to limit operations in low profit margin markets and focus on the development of new innovative products.

2020

The Group invests €3 mil. in the incorporation of surgical mask production lines in the production facilities in Greece, Scotland and Ireland & €5 mil. in mechanical equipment to produce meltblown material used in all types of face masks (surgical, FFP2 and FFP3 masks).







THE GROUP **Our business sectors**

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

Technical Fabrics















Packaging Solutions



Hydroponic Greenhouses





THE GROUP **Technical Fabric sector**

of sales take place 97% in the international market

The technical fabric sector involves the **production and trading of synthetic fabrics** for industrial and technical uses. It operates through 7 Group subsidiaries and has an international focus, with 97% of its sales taking place in the international market.

The main products in this sector are:

- 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
- ARNO Webbings / Ropes
- Industrial Yarns and Fibres









The packaging sector involves **the production and trading of industrial products** and focuses on the European market, with an emphasis on Ireland and Southeast Europe. This sector is supported by **6 subsidiaries** of the Group, with 58% of its sales taking place in the domestic market.

The main products in this sector are:

- FIBC / Filling Solutions
- Bags / FFS Films
- 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 | / THRACE IPOMA | / THRACE POLYFILMS | / THRACE SYNTHETIC | / THRACE, greiner greiner

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THE GROUP

Hydroponic greenhouses with the use of geothermal energy



The largest hydroponic greenhouses in SE Europe and the only ones worldwide heated exclusively by geothermal energy.

Operating since 2013 with full respect for the environment and the consumer, we have been cultivating pure and delicious hydroponic vegetables on 46 acres of land, with the use of geothermal energy (renewable source of energy) and with almost zero carbon footprint.











THE GROUP **Participations and awards**

[GRI: 102-12, 102-13]

Participations

• EDANA



Since 1971, EDANA has been the international link for nonwovens and other industries, providing a comprehensive range of services to over 320 members. (https://www.edana.org/)



• CIRFS

The European Man-Made Fibres Association (CIRFS) is the representative body for the European man-made fibre industry. CIRFS members now account for over 80% of European man-made fibre production. (<u>https://www.cirfs.org/</u>)

AGMPM

The Association of the Greek Manufacturers of Packaging & Materials (AGMPM) ••**●**ΣΥΒΙΠΥΣ was founded in 1999, bringing together the producers of packaging materials. (https://www.pac.gr/)



AHPI

The Association of Hellenic Plastic Industries was founded in 1958 and is active in the field of plastic applications. (https://www.ahpi.gr)



• PCEP

The organization Polyolefin Circular Economy Platform (PCEP) aims at redesigning and recycling packaging products and materials. (https://pcep.eu/)

• EAGM

EA(M

The European Association of Geosynthetic product Manufacturers was founded in order to promote the knowledge and use of European geosynthetic products. (https://www.eagm.eu/)

• STC

Synthetic Turf Council (STC) is a non-profitable commercial union for the promotion, development and support of the industry of synthetic turf. (https://www.syntheticturfcouncil.org)



Initiatives

Circular Plastics Alliance

We participate in the Circular Plastics Alliance envisioning to implement the circular economy model for plastics and to increase the use of recycled plastics in new products.

The Alliance covers the entire plastic value chain and has more than 210 member organizations from the industry, academic community and public authorities.



THE GROUP Participations and awards

Awards



• Packaging Awards 2020

Distinction with 2 Silver Awards in the category of Packaging Raw Materials for Skinny Lid. for the installation of the Building Management System (BMS) along with the automated firefighting systems and the upgrading of equipment in the sectors of management of goods and in the category of activities for the creation of the internal health and safety culture "Building Health & Safety Culture".



• Health & Safety Awards 2020: "Upgrade and Modernization of Facilities" Distinction as one of the honourable recipients of health and safety awards, held at the Cultural Centre of the Stavros Niarchos Foundation.



• Fire & Emergency Awards 2020

Distinction and 3 awards (Gold, Silver and Bronze) for Thrace Group and its factory in Ioannina. Driven by the motto "Safety First", the aim of the Awards was to highlight and reward the best practices of the year for safety measures in factories.



• EcoVadis Awards

Distinctions for the companies Thrace Polyfilms (Silver Medal), Thrace Greiner (Silver Medal) and Thrace Ipoma (Bronze Medal) by EcoVadis, which is a reliable international assessment system for sustainable development practices.









FIRE & EMERGENCY EXCELLENCE AWARDS '20

RECOGNIZING BEST RESPONSE PRACTICES

ecovadis

Business Sustainability Ratings







Ensuring the future with sustainable development as a guide



SUSTAINABLE DEVELOPMENT

Our policy

Our approach

Materiality analysis





SUSTAINABLE DEVELOPMENT **Our policy**

Our priority is to plan actions that will help us further reduce our environmental footprint, as well as provide innovative and sustainable products within the framework of the circular economy, making the most of our know-how, experience, flexibility, and resilience under adverse circumstances. We put particular emphasis on the effective management of business continuity and the establishment of trust among all our stakeholders and, of course, on the protection of the environment. as our utmost concern.

The Group sets, maintains and applies some basic principles regarding the pillars of society, the environment and the economy. At the same time, it has developed a specific policy concerning sustainable development and the management of environmental, social, and corporate governance issues. The recently established Department of Sustainable Development aims at implementing actions and initiatives that promote sustainable development and create value for our stakeholders, the market and society as a whole, in accordance with the Sustainable Development policy of the Group.

In its approach to sustainable development, the Group uses indices, tools and recommendations by internationally accredited initiatives and organizations (GRI, TCFD, SASB, CDSB, CDP), the UN Sustainable Development Goals (SDGs), the principles of the United Nations Global Compact (UNGC), the Athens Stock Exchange ESG Reporting Guide and the ISO 14064-3 standard for the validation and verification of greenhouse gas emissions.

Regarding corporate governance, the Group has adopted and follows a comprehensive framework of principles, procedures and policies that ensure its transparency and responsible operation. In relation to social responsibility, Thrace Group seeks to achieve high performance through its business activities, to produce and distribute economic value, directly or indirectly, to the communities where it is operating. Moreover, the Group has an Environmental Policy in place which focuses on mitigating the environmental impact deriving from its operations, by committing to the application of the principles of the circular economy, responsible waste management and reduction of both energy consumption and greenhouse gas emissions that are related to its activities.



" Sustainable development is at the core of our corporate strategy and culture.



SUSTAINABLE DEVELOPMENT Our approach

Thrace Group seeks to implement practices that are promoting sustainable development and, through its policies, is committed to respecting humanity, society and the environment, in order to remain a reliable social partner. Our approach to sustainable development is based on six pillars:









Value creation

At Thrace Group, we focus on creating financial, social and environmental benefits throughout our value chain and towards all our stakeholders. In this context, we identified anew the economic, social and environmental aspects of our activities and we then proceeded with the prioritization of the material topics of sustainable development that are related to our business model, based on the methodology of the internationally recognized GRI standard.

Stage 1: Identification of the sustainable development topics

Based on the Principle of Stakeholder Engagement and the Sustainability Framework of the GRI Standards, we identified topics related to the activities and stakeholders of the Group, which came up by reviewing the following, among others:

- Internal documents on policies, procedures, strategy and results of ongoing stakeholder engagement.
- Publications for 2020 related to our industry and the Group.
- Sustainable Development Reports of peer companies.
- UN Sustainable Development Goals.
- GRI publications on packaging.
- International standards, such as SASB and BRC.
- The material topics that came up through the previous materiality analysis, mentioned in the 2019 Sustainable Development Report.



Stage 2: Specification of the hierarchy criteria

Based on the principles of materiality and stakeholder engagement by the GRI Standards, we proceeded with the specification of the criteria for the prioritization of the topics identified, which were:

1. The degree to which these topics significantly impact the assessments and decisions of the stakeholders in relation to the Group.

2. The degree to which these topics reflect the broader impacts (both positive and negative) of the operation of the Group on the economy, society and the environment.

Stage 3: Hierarchy of the sustainable development topics

The above criteria were incorporated into respective questionnaires, which were completed by the Group executives who represented internal and external stakeholders.



Stage 4: Validation of the results

The results were validated by the Sustainability Committee and the top management of the Group, based on the principle of completeness and stakeholder participation by the GRI Standards. Through this analysis, we identified 10 material topics which are presented in 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 in the context of the circular economy				
5	Reduction of waste and maximization of reprocessing and recycling opportunities				
6	Reduction of water consumption				
7	Protection and conservation of biodiversity				
8	Creation of financial value and financial performance of the Group				
9	Ensuring the quality, health and safety of customers				
10	Promoting transparency of product information and customer information				
11	Creating and securing employment				
12	Continuous training and development of employees				
13	Ensuring the health, safety and well-being of employees				
14	Defending human rights at work				
15	Support the local community and maintain active participation and cooperation				
16	Responsible corporate governance and assurance of business ethics and compliance				
17	Assurance of business continuity and preparedness for emergency response				
18	Evaluation of suppliers in terms of their social and environmental performance				





Materiality Map

Significance of economic, environmental and social impacts



In relation to the previous Report that was published, 4 new material topics emerged:

- Assurance of business continuity and preparedness for emergency response.
- Defence of human rights at work.
- Creation and safeguarding of employment.
- Reduction of greenhouse gas emissions.

Although the topics below, which were considered as material in 2019, did not arise again, the Group monitors its performance in these, as it ought to monitor and address them responsibly:

- Evaluation of suppliers in terms of their social and environmental performance.
- Continuous employee training and development.
- Adaption to the effects of climate change.
- Reduction in the consumption of (non-renewable sources of) energy and improvement in energy efficiency.
- Support of the local community and maintenance of active participation and collaboration.

More information regarding the "Stakeholder Engagement" and the "Material Topic Boundaries Table" of the material topics is available in the section of Tables of Information and Indices.





Innovation and respect for the environment



PRODUCT:

in the

ie

HISVIN 3135

Provision of innovative and sustainable products in the context of the circular economy

Reduction of waste and maximization of reprocessing and recycling opportunities

Reduction of greenhouse gas emissions

IN THE LOOP platform



PRODUCT Provision of innovative and sustainable products in the context of the circular economy

15 LIFE ON LAND

[Material topic]





[GRI: 103-2, A-G3]

Circular economy

The EU Strategy for plastics in the context of the circular economy lays the foundations for a new plastics economy, within which the design and production of plastic products fully respect the utilization of more sustainable resources and the needs for the prioritization of waste management (reduction, reuse and recycling). This way, innovation is further promoted, while contamination by plastic waste is limited. The strategy also contributes to the fulfilment of the goal for a contemporary economy characterized by low carbon emissions and efficient use of resources and energy. At Thrace Group, we fully meet this strategy by turning the challenges of modern times into opportunities for growth, aspiring to foster a sustainable competitive advantage. Within this framework, we have adopted the principles of the circular economy throughout the life cycle of our products.





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- Assurance of quality, safety and sustainability regarding the use of natural resources upon the stage of selection and supply of their raw materials.
- Evaluation of raw materials based on criteria beyond cost, in order to establish and maintain long-term relationships of trust with our suppliers, and to incorporate terms in our contracts for the management and prevention of risks that are related to product safety, as well as the required environmental standards.







	Reduction in the use of plastic by lowering the product weight.
	Environmentally-friendly and reusable solutions.
	Replacement of raw materials with recycled ones.
	Production of monomaterial products.
	Product Life Cycle Assessment (LCA) and development of Environmental Product Declarations (EPD) in accordance with international standards.
۲ ۲ ۲	Research and development for reusable products.





[A-G3]



Saving on raw materials through the reuse of internal waste.



In accordance with the European Strategy, which requires that all plastic packaging circulating in the EU should be recyclable by 2030, we are already producing and distributing products worldwide that meet this requirement.



Drop of the ratio energy consumption / kilo of manufactured product, by scheduling, monitoring, increasing efficiency and upgrading equipment (estimated reduction of approximately 7% in 3 years).



Investment in production machinery that is more energy efficient.



- Synergies among the companies of the Group in order 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, preferably if possible.



Reuse

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



Collection

Proper separation, collection in special bins and storage of our production residues in special temporary storage stations, aiming at their optimum utilization.



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Recycling

Actively responding to the call of the European Commission for a voluntary pledge to increase the use of recycled plastic, we have already committed to replace 8,500 tons of primary raw material with recycled plastic by 2025.



Separation and recycling of non-reusable raw materials through licenced partners.



Disposal

Completing the life cycle of plastics.



Closing the life cycle of plastics









Circular economy

We actively enhance the model of the circular economy through specific actions. By applying practices that are based on the principles of reduce, reuse and recycle, we manage to steadily reduce our environmental footprint by focusing on the reduction of waste of resources in the production process and by putting emphasis on the utilization of recyclable resources and the extension of the life cycle of products.





- Design and manufacturing of products with reduced weight, e.g. yoghurt container with reduced weight by 25% lower, drinking cup with reduced weight by 15%.
- Collaboration with customers for the development of packaging solutions that reduce secondary packaging needs, such as the replacement of wooden pallets with reusable plastic ones and the replacement of carton boxes with reusable plastic pallet boxes.
- Design and manufacturing of multiple-use products and replacement of single-use products, e.g. reusable cup Re-Cup 2.
- Design and manufacturing of 100% recyclable products; as a result, nearly all the products of Thrace Group are made of single material (Monomaterial), either polypropylene or polyethylene.
- Focus on manufacturing new products through upcycling closed systems, such as containers made by recycled raw material from disposable plastic cups or FFS bag film for raw material packaging made by recycled bags of the same type.
- Utilization of 50% or 100% recycled material to produce industrial packaging shrink film, used mainly as outer covering for many types of packaging.
- Recycled heavy-duty bags, specially made for the transport of products weighing from 25 to 50 kg, made of recycled material from fertilizer packaging by 30%.
- Garbage bags from 100% recycled material.
- Paint containers made of recycled material.
- Cups with a lower energy footprint, thanks to the addition of natural materials (calcium carbonate and others) by 30% to partially replace polypropylene.
- Black coloured products containing up to 50% recycled polypropylene.



[GRI: 301-1]

The purpose of the monitoring framework is to measure our progress towards the circular economy regarding the supply of raw materials in relation to recyclable raw materials.

Raw materials (in tons)*

	2020	2019	2018*	Change (2020 vs 2019)
Polypropylene	86,671	91,679	92,420*	-5%
Polyethylene	12,875	10,151	9,001	27%
Dyes and additives (Masterbatch)	3,052	3,413	3,224	-11%
Packaging materials	6,692	6,864	7,729	-3%
Polyester fibre	0	643.1	494.5	-
Total	109,290.0	112,750.1	112,868.5	-3%

* Any difference between the data on the table above regarding year 2018 and the data mentioned in the Report published in 2018 is due to the fact that the present Report does not include the company Thrace-LINQ Inc.

[GRI: 301-2]

Recycled raw materials that are introduced into the production process, acquired from residue from our production process and external sources (in tons)

	2020	2019	2018	Change (2020 vs 2019)
Recycled raw material	6,961	6,256	4,741	11%
Percentage of recycled raw material	6%	6%	4%	







Reduction of waste and maximization of reprocessing and recycling opportunities

[Material topic]



Approach

[GRI: 103-2]

Solid waste and effluents

The Group complies with the legal requirements for the management, storage, transportation, recycling and disposal of waste. Within this framework, we have conducted an environmental impact study that mainly concerns potential waste and its management, while we have received the approval for the environmental conditions with the simultaneous compliance with contractual obligations, such as registering in the electronic waste registry and paying the recycling fee.

In the companies of the Group, we monitor the types and quantities of waste generated, including the location and the method of their recycling. In this context, we follow specific internal procedures for waste management, such as the evaluation of waste management companies, the preparation of daily, weekly and monthly reports on the type and quantity of waste generated, while striving to reduce waste in our plants. The Group makes sure that the companies where its waste (hazardous or non-hazardous) ends up, either for final treatment of for disposal, have their legal documents of operation in effect, explicitly proving their right to transfer and manage the waste they receive. We also receive the respective recycling certificates.





Use of chemicals

Our field of activities imposes the use of chemicals. The management of potential environmental risks that may arise from the use and storage of chemicals is an important priority for the Group. To manage these risks effectively, we fully comply with the legal requirements for the management, use and storage of chemicals and other hazardous substances. We do not produce, trade or use chemicals or other hazardous substances that are subject to national or international constraints. We also educate and train our employees on the safe handling and use of these substances, necessary for our production and maintenance of facilities. We have taken all necessary measures to ensure that, in all the companies of the Group, chemicals used in their processes are placed on metal stands to avoid environmental pollution and are stored in appropriate storage spaces. Moreover, at the bottom of the stands, there are liquid collectors to prevent any leakage of small amounts of chemicals to the environment. All chemicals that enter the premises of the Group are stored in appropriate and clearly signalled areas, to be accessed only by individuals with special permission from approved suppliers, who know the safety regulations in detail.




Performance

[GRI: 103-3, 306-2, ESG: SS-E5]

Solid waste and effluents

The companies of the Group have systems to monitor the non-hazardous liquid waste they produce (effluents). In particular, regarding the production process of the greenhouses in Xanthi, although the irrigation area expanded, the effluents were reduced as a result of geothermal water recycling and the retention of the irrigation water. In relation to solid waste management, the table below contains data about the quantities of waste generated by the Group, according to the method of their management. It must be noted that the quantities of residue accruing in the production units are fully recycled in the production process.

		Total weight of hazardous waste (t)			e %		Total weig of non-haz	ht ardous waste	e (t)	Percentage %			
Waste management method	2020	2019	2018*	2020	2019	2018*	2020	2019	2018*	2020	2019	2018	
Recycling	197.98	203.28**	259.79	88%	93%	93%	2,817.38	3,350.59	2,733.84	78%	62%	70%	
Incineration (including energy recovery)	13.77	12.49	17.17	6%	6%	6%	8.86	225.08	44.88	0%	4%	1%	
Landfill disposal	12.00	-	-	5%	0%	0%	798.38	1,824.22	1,133.53	22%	34%	29%	
Other waste management methods	-	2.65	3.30	0%	1%	1%	-	-	-	0%	0%	0%	
Total	223.75	218.42	280.26	100%	100%	100%	3,624.62	5,399.89***	3,912.25	100%	100%	100%	

* Including Lumite Inc. Any differences in data in relation to that mentioned in the Report for 2018 are due to the fact that the current Report does not include the company Thrace-LINQ Inc. ****** The company Lumite Inc. reduced waste deriving from oils.

*** The increase in the weight of non-hazardous waste is due to the increase in production.







[Material topic]



Approach

[GRI: 103-2, 102-11, 201-2, ESG: A-E2, SS-E1, A-G3]

To maximize business opportunities and mitigate climate change risks, we adapt our business model that is based on the principles of the circular economy, in order to reduce the carbon footprint and energy consumption resulting from our operations, and we identify future opportunities through an integrated process of risk assessment. We are developing our business strategy in line with the recommendations of the international initiative "Task Force on Climate-Related Financial Disclosures (TCFD)" so as to address the economic impact of climate change.

The companies of the Group follow specific procedures, according to which they categorize their environmental impacts and they have appointed environmental management executives to monitor their performance through the Environmental Management System. Moreover, they apply certified systems, in accordance with international standards, which include actions and measures for the protection of the environment and the safeguarding of the proper use of the energy consumed.





saving.

Over the past few years, the companies of the Group have proceeded with actions aiming at saving energy, such as:

ones, demanding less

energy.



of measures for its

reduction.



Certifications

In addition, the companies apply certified systems in accordance with international standards. These systems include actions and measures for the protection of the environment and the safeguarding of the proper use of the energy consumed.

Certification

ISO 14001:2015 Environmental Management System

Global GAP for the implementation of proper agricultural practices

ISO 50001:2018 Energy Management System

ISO 9001: 2015 Quality Management System









[GRI: 103-3, ESG: SS-E1]

In the Group, we recognize the importance of recording greenhouse gas emissions and thus we have begun to do so (starting with the companies with the greatest impact) in order to then take action towards their reduction. The modernization of the equipment, the deployment of renewable sources of energy, the continuous effort to increase the percentage of the recycled material and the proper management of waste constitute the basic pillars of our approach.

Low carbon footprint by our greenhouses



Emissions from tomato production 0.113 kg CO₂ eq/product kg

Emissions from cucumber production 0.112 kg CO₂ eq/product kg

[ESG: A-S5]

The products of Thrace Greenhouses, and thus the revenue deriving from them, are characterised as sustainable given their related environmental benefit resulting from their low carbon footprint.

More information at: http://www.thracegreenhouses.com/media/uploads_file/2020/11/23/p1enqam2v61epa1ol61pel1g1ofg04.pdf



Our products have nearly zero CO2 emissions to display

ISO 14064-1:2018

In 2019, we were certified by EMI CERT, the accredited Greek GHG verification body, for our full compliance with the requirements of ISO 14064-1:2018 standard regarding the quantification of greenhouse gas emissions (GHG) of the product.





The main reason behind our low carbon footprint is the utilization of geothermal energy, which, apart from offering a comparative advantage in the cost of production, also reflects the way of managing our environmental impact. It must be noted that the heating of the greenhouses is the most important energy factor in horticulture. This significant factor, that in the northern countries of Europe may reach up to 90% of the needs in energy needs (British Standards Institution, 2012), in Thrace Greenhouses it is covered in full by the utilization of geothermal energy. Within this framework, over the past few years, we have obtained respective Guarantees of Origin from Renewable Energy Sources for Thrace Greenhouses, covering 3,495 MWh of electricity consumption for 2020. The Guarantees of Origin RES / CHP were used to verify the origin of electric power that is generated in its entirety by renewable energy sources and without any direct carbon dioxide emissions.



Direct and indirect emissions

[GRI: 305-1, 305-2, 305-3, ESG: C-E1, C-E2, A-E1, SS-E1]

In 2020, we decided to proceed with the recording of our direct and indirect emissions through internationally recognized initiatives and standards, such as the EPD (Environmental Product Declaration), the CDP (Carbon Disclosure Project) and the TCFD (Task Force on Climate-Related Financial Disclosures). The Group is now a member of the international organization CDP (Carbon Disclosure Project) and is evaluated on the way it manages the impact of its activities on the environment and on climate change. Following this initiative, it proceeded with recording the carbon footprint of its three major subsidiaries. The tables below contain the data collected and certified by ISO 14064-3, with tCO₂e referring to the total greenhouse gas emissions in tons of CO₂ equivalent.





Don & Low

	2020	2019	2018
Direct emissions (Scope 1) tCO ₂ e			
Natural gas	914	1,358	2,011
Liquid gas for production	150	156	142
Liquid gas for vehicles	-	-	-
Diesel for production	-	-	-
Diesel for vehicles	16	57	65
Total	1,080	1,571	2,218
Indirect emissions (Scope 2) tCO2e			
Electric power	7,813	10,051	10,583
Total	7,813	10,051	10,583
Indirect emissions (Scope 3) tCO2e			
Waste	37	46	28
Raw material	58,046	66,251	67,099
Water	10	28	34
Total	58,094	66,325	67,161



Thrace Nonwovens & Geosynthetics

	2020	2019	2018
Direct emissions (Scope 1) tCO ₂ e			
Natural gas	3,398	3,421	3,698
Liquid gas for production	116	131	252
Liquid gas for vehicles	-	_	_
Diesel for production	357	278	236
Diesel for vehicles	33	26	55
Total	3,904	3,856	4,241
Indirect emissions (Scope 2) tCO ₂ e			
Indirect emissions (Scope 2) tCO2e Electric power	33,106	29,635	32,716
	33,106 33,106	29,635 29,635	32,716 32,716
Electric power			
Electric power Total			
Electric power Total Indirect emissions (Scope 3) tCO2e	33,106	29,635	32,716
Electric power Total Indirect emissions (Scope 3) tCO ₂ e Waste	33,106 20	29,635 14	32,716 17



Thrace Pack

	2020	2019	2018
Direct emissions (Scope 1) tCO2e			
Natural gas	-	_	_
Liquid gas for production	150	113	74
Liquid gas for vehicles	34	25	24
Diesel for production	-	_	_
Diesel for vehicles	1	1	1
Total	185	139	99
Indirect emissions (Scope 2) tCO2e			
Electric power	16,658	14,735	15,835
Total	16,658	14,735	15,835
Indirect emissions (Scope 3) tCO2e			
Waste	11	8	5
Raw material	53,639	47,630	41,970
Water	7	9	10
Total	53,657	47,647	41,985



Categories of monitoring

The categories of monitoring used to calculate our total Carbon Footprint in accordance with the Greenhouse Gas Protocol are:

Scope 1:	Direct emissions that are produced straight from the production syste
Scope 2:	Indirect emissions associated with the use of electric power.
Scope 3:	Other indirect emissions deriving from activities that cannot be contr or purchase of products and raw materials, water consumption, the g

As a protocol of the calculation of the carbon footprint, we are using internationally accredited measurement methodologies, such as the Greenhouse Gas Protocol and ISO 14064.





tem and directly associated with processes and products.

trolled directly by the company and that may be associated with the transport generation and management of waste and others.



[GRI: 302-1, ESG: C-E3]

Energy consumption within the Group per type and source of energy (MJ-Megajoule)

	2020	2019	2018
Non-renewable sources			
Electric energy			
Electric energy (total)	550,802,783	571,706,671	551,742,505
Thermal energy			
District heating (total)	1,674,000	1,548,000	2,041,200
Fuel			
Petrol	22	27	19
Natural gas	81,338,215	93,790,669	110,945,310
Methane	56,221	88,920	108,000
Liquid gas	3,696,909	3,680,961	2,718,521
Diesel	1,047	1,739	770
Wood pellets for heating	4,092,002	2,886,332	-
Total	89,184,416	100,448,648	113,772,620
Renewable sources			
Geothermal energy (total)	22,722,870	23,680,000	20,575,000
Total (MJ)	664,384,069	697,383,319	688,131,325
Total (MWh)	184,551	193,718	191,148



Energy consumption within the Group per type and source of energy (%)

	2020	2019	2018*
Total amount of energy consumed within the Group from non-renewable sources (%)	96.6%	96.6%	97.0%
Total amount of energy consumed within the Group from renewable sources (%)	3.4%	3.4%	3.0%
Total	100%	100%	100%
Electric power consumption (%)	82.9%	82.0%	80.2%
Thermal energy consumption (%)	0.3%	0.2%	0.3%
Fuel consumption (%)	13.4%	14.4%	16.5%
Geothermal energy consumption (%)	3.4%	3.4%	3.0%
Total	100%	100%	100%

[GRI: 302-3]

Energy intensity of the Group (kWh/kg of production)

Companies / Country of operation	2020	2019	2018*
Total of operations in Greece (Thrace Nonwovens & Geosynthetics S.A., Thrace Polyfilms S.A. & Thrace Plastics Pack S.A.)	1.16	1.21	1.23
Don & Low Ltd	1.66	1.54	1.57
Thrace Ipoma A.D.	1.58	1.50	1.26
Thrace Greiner Packaging S.R.L.	1.36	1.40	1.45

* Any differences with the data published in the respective Report of 2018 are due to the fact that some data has been restated after demonstrating that there was an error in the calculation method used. Moreover, any differences between the data of electric power and thermal energy and that published in the 2018 Report are due to a recalculation (regarding electric power), as well as to the fact that the present Report does not include the company Thrace-LINQ Inc.



PRODUCT **IN THE LOOP platform** [A-G3]

Having incorporated the opportunities that the circular economy presents in our business strategy, we have created the IN THE LOOP platform, which aims at upcycling used plastic for the creation of new sustainable products.



GIVING VALUE TO PLASTIC WASTE

What it is:

• An environmentally-driven platform, which aims at creating value by upcycling plastic waste.

• This platform is available to all possible stakeholders, brands & consumers.

What it does:

- Designs closed/controlled loop recycling systems.
- Enhances collaboration between value chain stakeholders.
- Proves that recycling is feasible, desirable & profitable.
- Matches used products with potential new recycled products.
- Raises awareness about plastic waste upcycling.
- Promotes and certifies stakeholders' sustainable profile.

The result:

- Reduces plastic waste.
- Reduces carbon footprint.
- Preserves natural resources.
- Secures the efficient transition to a circular economy model.







Collaboration and support of our people





PEOPLE

Creating and securing of employment

Defending human rights at work

Ensuring the health, safety and well-being of employees.

Ensuring the quality, health and safety of customers.

Management of supply chain

Support of local communities and maintenance of active participation and collaboration







[Material topic]



[GRI: 103-2]

At Thrace Group we are proud of our people. We make sure that the working environment encourages human relationships, is dynamic and is constantly improving, by offering opportunities for development and self-growth. One of our top priorities is to search for and attract new talent that will inspire and strengthen the dynamics of our Group.





Our people are our strength: this has been the fundamental value of our Group since 1977, serving as our guide in every step we take. For over 40 years, our goal has been to always be at the forefront. Each one of us individually and all of us together, give our best in order to be among the leading producers of technical fabrics and packaging solutions in the world, while remaining a big family with strong bonds.

Recruitment process

For the selection of new employees, we rely on objective criteria that exclude any possibility of discrimination due to gender, age, marital status, nationality, religion, sexual orientation, political beliefs etc. When new job positions arise, we give priority to our employees and encourage them to express their interest through our internal mobility processes. If the vacancy is not covered internally, we then address the general public. More specifically, we follow two different recruitment processes depending on the category of employees we are intending to hire, which engage a special committee for the assessment of candidates in order to ensure the transparency of the procedure. The two categories are: a) production worker (blue collar worker) and b)

employee in administrative position (white collar worker).

It is worth noting that part of the recruitment strategy of the Group involves the support of 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, thus encouraging young people to remain in the various regions.

Continuous employee training and development [A-G3]

We provide introductory educational programmes and extensive vocational training, aiming at the development of our employees as we are using the latest production methods that demand continuous employee training. Therefore, we actively contribute to the creation of value for our human resources, while offering a benefit to society as a whole. The training sessions are conducted either by our staff or by external highly knowledgeable consultants, who are collaborating with our companies on a regular basis. Through this training process, the employees of each company acquire extensive experience that allows them to meet the requirements of their job.

The selection process for the training sessions includes the following stages:

The Directors of the various departments evaluate and identify the needs of the employees on an annual basis.

The HR department prioritizes these needs in collaboration with the Directors of the various departments.







The CEO collaborates with the HR department in order to approve the training programmes based on the prioritized needs.



The training programmes are implemented.



Performance

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

Total number of employees by type of employment contract

		Men			Women		Total					
	2020 2019 2018*		2018* 2020 2019		2018*	2020	2019	2018*	Change (2020 vs 2019)			
Permanent contract	1,377	1,461	1,579	411	371	443	1,788	1,832	2,022	-2.4%***		
Fixed-term contract	272	150	107	142	120	98	414	270	205	53.3%**		
Total	1,649	1,611	1,686	553	491	541	2,202	2,102	2,227	4.8%		

* Any differences between the above table data and the ones published in the financial report of 2018 are due to the fact that the present Report includes the data of the company Lumite Inc.
 ** The large increase in part-time workers is mainly due to the increase in the production capacity in the new surgical mask production lines in Greece, Scotland and Ireland.
 ** The number of fixed-term contracts decreased during 2020. This comes as a result of better management and a slightly reduced production for 2020, even though the production capacity of the group remained equal to 2019.

Total number of employees by type of employment

		Men			Women		Total					
	2020 2019 2018*			2020 2019 2018			2020	2019	2018*	Change (2020 vs 2019)		
Full-time	1,644	1,607	1,680	526	474	524	2,170	2,081	2,204	4.2%		
Part-time	5	4	6	27	17	17	32	21	23	52%**		
Total	1,649	1,611	1,686	553	491	541	2,202	2,102	2,227	4.8%		

* Any differences between the above table data and the ones published in the financial report of 2018 are due to the fact that the present Report includes the data for 2018 has been restated, due to the previous inadvertent misrepresentation of data concerning Thrace Greenhouses S.A.

** The big increase in part-time workers is mainly due to the increased production capacity related with the new surgical mask production lines in Greece, Scotland and Ireland.





Total number of employees by geographical area

	Greece		United States of America		Romania			Norway		United Kingdom			Ireland			Serbia		Bulgaria						
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
2020																								
Permanent contract	759	129	888	105	46	151	68	35	103	8	6	14	298	72	370	52	54	106	4	3	7	83	66	149
Fixed-term contract	242	132	374	5	2	7	0	0	0	0	1	1	25	5	30	0	1	1	0	0	0	0	1	1
Total	1,001	261	1,262	110	48	158	68	35	103	8	7	15	323	77	400	52	55	107	4	3	7	83	67	150
2019																								
Permanent contract	797	116	913	113	48	161	72	31	103	8	6	14	339	102	441	30	7	37	4	4	8	98	57	155
Fixed-term contract	148	118	266	2	1	3	0	0	0	0	0	0	0	0	0	0	1	1	0	0	0	0	0	0
Total	945	234	1,179	115	49	164	72	31	103	8	6	14	339	102	441	30	8	38	4	4	8	98	57	155
2018																								
Permanent contract	805	100	905	127	56	183	71	27	98	7	6	13	378	115	493	31	7	38	4	4	8	156	128	284
Fixed-term contract	88	86	174	18	10	28	0	0	0	0	0	0	0	1	1	0	1	1	0	0	0	1	0	1
Total	893	186	1,079	145	66	211	71	27	98	7	6	13	378	116	494	31	8	39	4	4	8	157	128	285

* The change in the data of the United States of America as compared to 2018 is due to staff cutdowns imposed by the adverse market conditions in 2019.





[GRI: 102-41, ESG: C-S6]

Percentage of employees covered by collective bargaining agreements

Companies	
Thrace Plastics Co S.A.	100%
Thrace Nonwovens & Geosynthetics S.A.	100%
Thrace Polyfilms S.A.	100%
Thrace Eurobent S.A.	100%
Thrace Plastics Pack S.A.	100%
Thrace Greenhouses S.A.	100%
Thrace Synthetic Packaging Ltd.	10%
Thrace Ipoma A.D.	0%
Thrace Polybulk AS	0%
Thrace Polybulk AB	0%
Thrace Greiner Packaging S.R.L	99%
Lumite Inc	0%
Don & Low Ltd	80%
Thrace Plastics Packaging DOO	0%

[GRI: 404-1]

Average training hours by gender and job category

Offices

Producti

Other ca

Other ca

[ESG: C-S4]

Average (10% of

Average (90% of



	2020		20)19	2018		
	Men	Women	Men	Women	Men	Women	
	1.65	3.13	3.48	6.17	6.87	7.10	
tion	4.01	0.44	2.41	1.07	2.93	1.40	
category 1*	3.91	1.33	10.66	6.09	14.20	0.00	
category 2**	1.60	-	4.42	0.00	17.50	5.00	

* Other category 1: Refers to the Maintenance department

****** Other category 2: Refers to the Transportation department

Average training hours by employee level*

	Men		Women		Total				
	2020	2019	2018	2020	2019	2018	2020	2019	2018
je hours of training f higher paid employees)	4.0	3.3	7.0	8.0	3.2	3.5	4.5	3.2	6.3
e hours of training f lower paid employees)	1.6	4.3	7.2	2.1	3.1	3.5	1.7**	4.0	6.4

* The year 2018 does not include Lumite Inc.

** This reduction is due to the COVID-19 pandemic.







[ESG: A-S2]

Employee training expenditure (€)

2020	187,173
2019	175,879
2018	204,578

[ESG: C-S3]

Turnover rates*

	2020	2019	2018
Voluntary turnover rate	11%	16%	12%
Involuntary turnover rate	10%	7%	4%

* Data for the companies of the Group in Greece, USA, Romania, Norway, United Kingdom, Ireland, Serbia, Bulgaria.





Our people, our strength











[GRI: 103-2, ESG: C-S5]

In the Group, we recognize the risks associated with human rights, both within the workplace of our companies and throughout the supply chain, such as possible discrimination against employees due to race, religion, gender, nationality, age etc., violation of the privacy of employees and other stakeholders, as well as forced and child labour. These risks can have an impact on both the financial and human and social capital of the Group, through possible consequences on its reputation and social license to operate (SLO), while they might lead to legal sanctions. The issues of risk management concerning human rights, which are related to our supply chain are described below.

Respect of human rights

Everyone working in the Group, as well as our suppliers, ought to abide by the principles of ethical conduct of the Group regarding human rights. We are committed to zero tolerance for acts of harassment in the workplace, any form of discrimination, as well as for forced and child labour, both within the companies of the Group and throughout the supply chain. For each one of our companies, we are gathering information regarding human rights in the country of its activation; in the same respect, we make sure each company is informed about any possible changes in the related legislation that might affect its operation.

We commit to the resolution of complaints and the treatment of our employees in a fair and impartial way, recognizing the risk of violation of their rights and the consequences this might bring upon the wellbeing of our employees and the Group.





In the Group, we apply a series of policies and specific activities in order to minimize the risk of harassment and discrimination incidents. Indicatively:

- We inform the Administrations of the companies about the policies, which in their turn inform their employees accordingly.
- We inform employees through the Internal Work Regulation.
- We have established a Code of Professional Conduct, various corporate directives and internal regulations regarding human rights.
- We train our people so that they can identify and confront incidents of harassment and discrimination in the workplace and urge them to report to their supervisor or to the Human Resources department any case they might become aware of and that is contrary to the Code of Professional Conduct and the rest of our policies.
- We investigate all complaints for harassment or discrimination incidents in the workplace submitted via the reporting lines to the local administrations and then to the Administration of the Group and take the appropriate preventive or/and disciplinary measures, under the supervision of the heads of the departments in collaboration with the department of human resources of each company.



Fair remuneration and equal opportunities

[ESG: A-G4]

We are applying a Remuneration Policy for the members of the Board of Directors, which is posted on our webpage and defines, on the one hand, the established rights of the members of the Board of Directors and the obligations of the Group towards them and, on the other hand, the terms according to which remuneration will be attributed to the members during the period of its validity.

In the Group, the level of fixed remuneration is defined according to the rule of reasonable and fair remuneration to the most appropriate person, taking into consideration the level of tasks, knowledge and experience required for each role. At the same time, we ensure that we are not paying more than what we should and that, in any case, the long-term interests and sustainable development of the Group are served, based on the following principles:

- Provision of a fixed and appropriate level of fixed remuneration, avoiding variable remuneration and unnecessary risk taking, encouraging the continuous creation of value.
- Balance of long-term and short-term incentives in order to ensure the focus on both long-term and short-term goals that will create value in the long run.
- Association of remuneration with the achievement of short-term goals, which lead to the creation of value for the company over time.

In the same respect, we are applying a Payroll and Personnel Management Policy to determine a single framework for the management of human resources and all its parameters for the companies of the Group, through the establishment and fulfilment of common principles and rules, in compliance with the overall strategy and culture of the Group.



More specifically, our intention is:

- The harmonization of the remuneration with the annual budget of the company, as approved by the Senior Management of the Group.
- The optimum management and deployment of human resources of the company and all its parameters, such as the control of recruitments and internal movements, the scheduling of the annual leaves etc.
- The personal development of everyone, supported by an effective system of professional training and assessment of the employees of the Group companies.
- The connection of the professional development and the remuneration of employees with their personal performance.

Safety of facilities and protection of human rights

In the Group, we are applying safety measures for our companies, so that they can comply with the international principles for human rights and the implementation of the law. For instance, the companies are realizing regular safety risk assessments, which are submitted - upon request - to the labour inspectors and certification bodies, in order to confirm that the measures applied are proportional to the safety risk and in accordance with the applicable laws.



Freedom of association and right to collective bargaining

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

Commitment against forced labour and child labour

Recognizing the importance of voluntary work, we are implementing a series of procedures that ensure the full and timely information of employees regarding the conditions and requirements of the workplace. Moreover, we safeguard the possibility to leave, if the employee wishes so, by specifying notification deadlines of a reasonable timeframe, as stipulated by law, and by issuing immediately the related release documents. A necessary condition for any employee to be recruited in any position is to be over 18 years old. In the same respect, we are applying reliable procedures for the verification of the age of candidates by checking birth certificates issued by the competent authorities before the recruitment procedure.



Human rights in the supply chain

In the Group, we have adapted principles to avoid entering into cooperation with suppliers/ partners of high risk in terms of human rights violations. We are committed to promoting the continuous improvement of the international standards for human rights in our interaction with suppliers and associates. All the companies of the Group comply with the principles of the Group regarding human rights.

Actions to track down cases of human rights violations throughout the supply chain have not been taken yet; however, the fact that most of our suppliers are operating in countries in the European Union and the U.S., where typically the labour legislation is followed and the states are particularly sensitive to matters of human rights, safeguards to an extent the minimization of the risk of violating human rights in the supply chain of the Group.

The employees in the companies of the Group have the right and obligation to report any violations, which include cases that might lead to an increased risk of incidents or practices of modern slavery in their supply chain, by contacting the representatives of the human resources department or legal department of the respective company. These reports can be submitted - by name or anonymously - in person, over the phone or via email.



UK Modern Slavery Act 2015

The Group states that is has zero tolerance in relation to the breach of the UK Modern Slavery Act 2015, as well as of the terms of the individual agreements with each supplier. This statement is realized in accordance with article 54(1) of the UK Modern Slavery Act 2015 and defines the steps that the Group has already taken and continues to take for the prevention of incidents of modern slavery and human trafficking within the organization and throughout its supply chain. The Group recognizes the importance of combating slavery, forced labour and human trafficking ("modern slavery"), a set of matters of consistently increased interest that affect communities and people throughout the world. The Group implements the zero tolerance approach on all forms of modern slavery within the framework of its activities and its supply chain and recognizes that no sector of activity of the Group can be excluded. The Group is committed to act with integrity and transparency in this matter and recognizes its responsibility to be kept up to date with any possible risk within the organization and throughout its supply chain.

STATEMENT OF THRACE GROUP REGARDING THE MODERN SLAVERY ACT











[GRI: 103-3, 406-1]

In 2020, there were no reports in the Group or/and its companies of any incident of violation and/or infringement of human rights, discrimination due to race, religion, gender, age, disability, nationality, political beliefs etc., including incidents of harassment or breach of the UK Modern Slavery Act 2015.

[ESG C-S1]

Percentage of women (Group total)

2020	2019	2018
25.1%	22.7%	24.3%

[ESG: C-S2]

Percentage of women in managerial positions

2020	2019	2018
20%	22%	19%

Percentage of women in the Board of Directors

2	2020 - 2019	
	0%	

The Board of Directors decided to replace the independent members Ms. I. Apostolakou and Ms. K. Gianniri who quit with Ms. S. Maltezou and Ms. M. Papathanou, as announced in the Extraordinary General Assembly of the shareholders on February, 11 of 2021.

[ESG: A-S3]

Gender pay gap

2020	2019	2018
0.78	0.77	0.86





PEOPLE Ensuring the health, safety and well-being of employees.

[Material topic]



Approach

[GRI: 103-2, 403-1, 403-2, 403-3, 403-4, 403-5, 403-6, 403-7, 403-8, A-G3]

One of our basic business practices is the assurance of the health of our employees, setting as our primary strategic goal, the minimization of the possibilities for the occurrence of a workplace accident, as well as for the manifestation of occupational diseases among our people.

Adoption of Health, Safety and Environmental Policy

In the Group, we are applying a Health, Safety and Environment practice within the framework of the ISO 45001:2018 standard regarding health and safety in the workplace, covering all the employees of the Group and its subsidiaries. Its goals are the following:

- Training of all the employees in all countries of operations on matters of health and safety in the workplace.
- Assessment and prioritization of workplace hazards and specification of the related corrective and preventive actions aiming at the elimination of recognized hazards and the minimization of the possibilities of occurrence of an accident or incident.
- Operation in compliance with the health and safety legislation in force and all the related legislative requirements and standards.
- Application of measures for the prevention of health and safety accidents and incidents.
- Training and updates of employees on matters of health and safety in the workplace, as well as participation in related actions.











Health and Safety procedures

In order to achieve the goals we have set, the following actions are applied:

- Training on health and safety issues taking place both internally in the Group and in collaboration with external partners. More specifically, in 2020, due to the restrictive measures and prohibitions as a consequence of the pandemic, a limited number of trainings was realized and, thus, the original budget that was approved was not used in its entirety. In 2021, given that the circumstances related to the pandemic allow it, the health and safety training sessions will continue as planned.
- Engagement of health and safety managers in the facilities per factory or department.
- Investment in equipment, machinery and risk assessment in our facilities, in order to safeguard an absolutely safe environment. We are collaborating with specialized partners with long and demonstrated experience on matters of safety in order to be able to identify and manage risks.
- Application of a safety project since 2017, which involves the organization of meetings with the project teams of the various facilities in order to identify and manage risks. Within the framework of the specific project, project teams have been formed per facility, which, on a monthly basis, list the risks they identified and managed, are informed on matters related to safety, discuss and take related action.
- Communication campaign for further awareness among employees on matters of safety, by placing safety messages and rules on central spots of the facilities, by providing apparel with the related messages etc.



• Recording and investigation of the cases related to accidents/incidents or almost incidents; employees are encouraged to report any dangerous work practices or safety hazards they are being faced with at work. The procedure of receiving and handling health and safety complaints by employees is treated as confidential. Risks in the workplace have been identified, assessed and prioritized and the related corrective/preventive actions have been specified, aiming at the elimination of the recognized risks and the minimization of the possibilities for the occurrence of an accident or incident.





Through special Occupational Risk Assessment Studies, possible risks are identified for every job position. Some of the practices applied are the following:

- The health and safety information and procedures are at the disposal of employees in a fully comprehensible way in all the languages of the countries where the Group is operating.
- The responsibilities for the health and safety obligations are specified for every company by the Director of the factory, in collaboration with the Safety Technician and the Occupational Physician.
- The incidents related to health and safety (accidents/incidents, regardless of their severity) are recorded and investigated accordingly.
- Employees are encouraged to report any possible dangerous work practices or safety hazards they are being faced with at work. The procedure of receiving and handling health and safety complaints by employees is treated as confidential.
- The production processes, machinery and equipment of the Group are systematically monitored, in order to ensure that they are safe and in good condition for use during work.
- First aid kits and fire extinguishers are readily available and emergency exits are clearly marked and kept clear from obstruction.
- The workplace is maintained in a good condition consistently and continuously, in order to safeguard clean and comfortable working conditions, including the proper temperature, ventilation and lighting.



Proper use of safety equipment

In the Group, we ensure that all our employees are provided with the equipment necessary to perform their tasks safely and that they are well informed about the proper use of the equipment and the risks involved in their work. Our primary concern is to provide our employees with all the necessary Personal Protective Equipment. Indicative of the Personal Protective Equipment, provided by Thrace Plastics S.A., are the following:













Performance

[GRI: 103-3, 403-8, 403-9, 403-10, ESG SS-S6]

	2020	2019	2018
Work-related injuries			
Employees			
Number of hours worked	3,719,228	3,841,537	3,999,499
Number of fatalities as a result of work-related injury	-	-	-
Rate of fatalities as a result of work-related injury	-	-	-
Number of high-consequence work-related injuries (excluding fatalities)	-	1	-
Rate of high-consequence work-related injuries (IR) (excluding fatalities)	-	0.05	-
Number of recordable work-related injury	33	45	54
Degree of confirmed injuries	1.77	2.34	2.70
Number of days lost due to injury	1,106	1,061	673
Accident severity rate (SR)	59.5	55.2	33.7



	2020	2019	2018
Work-related injuries			
All workers who are not employees but whose who by the organization	work and/or wo	rkplace is controlle	d
Number of hours worked	67,323	51,527	100,470
Number of fatalities as a result of work-related injury	-	-	-
Rate of fatalities as a result of work-related injury	-	-	-
Number of high-consequence work-related injuries (excluding fatalities)	-	-	-
Rate of high-consequence work-related injuries (IR) (excluding fatalities)	-	-	-
Number of recordable work-related injury	-	2	1
Degree of confirmed injuries	-	7.8	2.0
Number of days lost due to injury	-	-	-
Accident severity rate (SR)	-	-	-



	2020	2019	2018
Work-related ill health			
Employees			
Number of fatalities as a result of work-related ill health	-	-	-
The number of cases of recordable work-related ill health	-	-	-
All workers who are not employees but whose work and/or workplace is controlled by the organization	-	-	-
Number of fatalities as a result of work-related ill health	-	-	-
The number of cases of recordable work-related ill health	-	-	-

The most common types of injuries are:

- Upper limb cut by a sharp surface.
- Limb injury by a moving cylinder.
- Shoulder injury.
- Limb fracture.



	2020	2019	2018
Health and Safety Management System			
Number of employees and workers who are not employees but whose work is controlled by the organization (external partners / contract workers)	1,325	1,239	1,393
Number and percentage of all employees and w and/or workplace is controlled by the organizat			
Number of such employees who are covered by a H&S management system	1,322	1,237	1,391
Percentage of such employees who are covered by a H&S management system	99.8%	99.8%	99.9%
Number and percentage of all employees and w and/or workplace is controlled by the organizat system that has been internally audited			
Number of such employees who are covered by a H&S management system that has been internally audited	1,279	1,237	1,391
Percentage of such employees who are covered by a H&S management system that has been internally audited	96.5%	99.8%	99.8%
Number and percentage of all employees and w or workplace is controlled by the organization, that has been audited or certified by an externa	who are cove		
Number of such employees who are covered by a H&S management system that has been externally audited	67	21	26
Percentage of such employees who are cov- ered by a H&S management system that has been externally audited	5.1%	1.7%	1.9%



Employee training on matters of Health & Safety in 2020*

The internal training sessions completed in 2020 by the safety technician and the COVID-Shield officer of each production unit in relation to Employee Health & Safety covered the following topics:

- Fire safety and use of fire extinguishing equipment
- Emergency situations building evacuation
- Proper use of face masks keeping of safe distances
- Instructions by the Group regarding COVID-19
- Treatment of the mental health of employees in relation to COVID-19

Employee training on matters of Health & Safety apply to the following Group companies: Thrace Plastics Pack S.A., Thrace Polyfilms S.A., Thrace Nonwovens & Geosynthetics S.A. and Thrace Eurobent S.A. and Thrace Plastics Co. S.A. The difference between the two years is due to the fact that some of the aforementioned training modules are repeated every two or three years.



Total number of employees who participated in internal training sessions on Health & Safety

2020	2019	2018
374	929	1,080

Employee Seminars on Health & Safety for 2020

Торісѕ	Number of participants	Hours of training per employee
Newcomers	45	2
Health & Safety in the workplace	153	2
Fire safety	168	2
Forklift trucks	81	2
Security	12	2
Emergency situations – building evacuation	112	2
First aid	8	1.5
Total	579	



Safety of facilities

In the Group, we apply safety measures in our companies so that they can comply with the international principles for the protection of the health and safety of our employees and partners. For instance, the companies conduct safety risk assessments on a regular basis, which are submitted, upon request, to labour inspectors and certification bodies in order to certify that the measures applied are in line with the safety risks and in accordance with the legislation in force.





Measures for protection against the COVID-19 pandemic

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 put into effect the following measures, which are being assessed on a regular basis. More specifically:

- Formation of crisis management teams, with the participation of the administrations of the Group subsidiaries and the Group, the Human Resources departments, the Occupational Physicians and the Safety Technicians.
- Provision of information to employees regarding COVID-19, the method of its transmission, the measures of prevention and protection, as well as recommendations and instructions of personal hygiene, according to the instructions of the competent authorities.
- Provision of personal protective equipment to the personnel (masks, antiseptic products, gloves).
- Performance of disinfections in the premises of the companies on a regular basis.
- Implementation of COVID-19 testing on all the employees (free of charge) and repeat testing, where necessary.
- Application of remote working for office workers, as far as reasonably possible.
- Provision of additional protection for employees who belong to vulnerable groups.
- Establishment of particular procedures and protocols for all visitors in the facilities of the companies (transporters, contractors, technicians etc.)
- Performance of personnel and administration meetings in all the companies of the Group, as well as Board meetings without physical presence, but instead via electronic and audiovisual means (e.g. teleconferences).
- Performance of General Meetings via teleconference, in accordance with the stipulations of the related legislative framework in force.
- Restriction of movement throughout the facilities of all the companies and restriction on business.



PEOPLE Ensuring the quality, health and safety of customers.

[Material topic]



Approach

[GRI: 102-11, 103-2]

The products of Thrace Group illustrate our vision in relation to the quality and safety of customers. To achieve this, we comply with the related national legislation and adapt international guidelines, safety regulations, best practices and industrial standards regarding the production and design of products in all of our facilities, while taking into consideration any possible impact of our products on the health and safety of customers, consumers and end users.

Food packaging

We are paying particular attention to the production of packaging coming into contact with food, due to the increased risk for the health and safety of consumers. The Group companies that are operating in the production and trade of packaging products (less than 10% of the annual product volume) are the following:

- Thrace Plastics Pack S.A., Ioannina / Xanthi, Greece
- Thrace Ipoma A.D., Bulgaria
- Thrace Greiner Packaging S.R.L., Romania
- Thrace Synthetic Packaging Ltd., Ireland
- Thrace Plastics Packaging DOO, Serbia









In relation to the handling and management of this critical issue for public health, all the companies of the Group are applying procedures that correspond to the commitment of the Group, which is:

- Not to manufacture or sell products that cannot be used safely.
- Follow appropriate work and facility maintenance practices.

More specifically, we have adopted management systems based on international standards (BRC, ISO 22000, FDA and IFS) and we are applying procedures in order to maintain a Quality Management System, including:

- Annual analysis of the proportion of plastic migrating to the food product.
- Microbiological analysis.
- Water analysis.
- Risk analysis.
- Product contamination control.
- Internal inspections.
- Product recall procedures.
- External and internal facility conditions.
- Application of safety measures.
- Specification of process area and product flow and implementation of cleaning standards and procedures.
- Regular equipment maintenance.
- Monitored product transport and distribution.
- Systematic employee training.



Masks

Similarly, upon the production of masks, in particular by Thrace Polyfilms, our main priority is to safeguard the health and safety of the end users. To that end, we are implementing the following practices:

- Accreditation of the company with a Quality Management System certified by ISO 13485:2016 for medical devices.
- Registration of the company and its products in the Registry of the National Organization of Medicines (Greece) and, then, licensing for the production of medical devices.
- CE marking on the surgical masks, in compliance with Regulation (EU) 2016/425 and Regulation (EU) 2017/745 for medical devices.
- Certification of the mask and the technical fabrics by STANDARD 100 of OEKO-TEX®, Class I.
- Accreditation of the company with the COVID-Shield certification.
- Implementation of a Quality Policy and a COVID-Shield Policy.





Focusing on assuring the users health







Product Responsibility

The products of Thrace Group illustrate our vision in relation to quality, which is safeguarded through a series of procedures and best practices, such as:

- Dissemination of a culture of quality throughout the Group, engaging all the personnel.
- Establishment and maintenance of collaborations with suppliers and clients aiming at an optimized added value for the supply chain.
- Establishment and maintenance of a Quality Management System, confirming to customers that the products and services received are characterized by their proper use and standard quality (in accordance with ISO standards).
- Investment in the latest technologies related to the sector of operations of the Group.
- Use of statistical techniques to monitor processes and track trends.





Basic stages of the Quality Assurance Process

Based on the Quality Management Plan, there are levels of control throughout all the stages of the production process, from receipt to loading.

Supplier and Raw Material Evaluation:

- Evaluation of suppliers (based on cost, availability, certifications). At this stage, the criteria used are, for instance, the ownership of environmental management system and energy management certifications (ISO 14001, ISO 50001) and the supply of recyclable raw material (film, palettes etc.) The companies of the Group also require their suppliers to demonstrate Safety Data Sheets for all raw materials, in order to have guarantees for the supply, use and storage.
- Supply of raw materials only by suppliers approved on the basis of the above criteria.
- Evaluation of raw materials through trial product production and laboratory comparison with products produced using different raw materials.

This procedure, as well as the evaluation and selection criteria, are subject to differentiation based on the sector of operations of the companies. For instance, in the case of supply of packaging for products that come in direct contact with food, food grade raw material is selected, which suggests that the material used (colour) is suitable for contact with food.

Product Evaluation:

Control of products throughout all production phases (dimensional inspection, inspection of mechanical attributes based on international standards, compliance of product with the specifications and requirements set by the client).



Transport Packaging Evaluation:

- Packaging based on the technical specifications of the products, including a specific number and arrangement of items, as well as a specific type of carton box to ensure smooth and safe delivery to the customer.
- Realization, upon loading, of visual quality inspection to check the suitability of the products to be loaded.
- Application of bar code systems, which ensure the loading of approved products only.

Customer Satisfaction Evaluation:

Regular phone or face-to-face communication between executives of the sales department and customers in order to listen to their needs and optimize the services we are providing.



Performance

[GRI: 103-3, 416-2, ESG: SS-S1]

In 2020, there were no cases of non-compliance with the legislation and the regulations in force regarding the impact of the products on the health and safety of consumers. In the same respect, none of the companies of the Group were faced with a product recall due to malfunctions or defects and thus there was no need for compensation to be provided.

PEOPLE Management of supply chain P [GRI: 102-9, ESG: C-S7]

The evaluation and selection of suppliers is an essential business operation in order to achieve a responsible supply chain.

Having recognized this need, we are applying practices to determine if a supplier complies with the requirements and prerequisites set for the collaboration between us.

The evaluation process for suppliers is realized using a special evaluation form, which has been developed by several companies of the Group. According to this procedure, suppliers are called to fill in the special evaluation form, which includes a series of topics against which they are evaluated.

Indicatively:

- The managements systems they possess (ISO certifications etc.).
- The **production processes** (product availability, environmental compliance etc.).
- **Quality management** (information regarding quality controls etc.).
- **Customer satisfaction** (quality specifications, product traceability etc.).
- **Research & Development** (information regarding the research & development departments, the security of personal data etc.).







The Group is in the process of creating a single Policy for the evaluation of suppliers, which will be based on ESG (Environmental, Social, Governance) criteria and will be applied by all the companies. It is estimated that this single Policy will be put into effect as of the beginning of 2021. The categories of suppliers of the Group vary according to the company.

The major categories include:

- Suppliers of raw material and marketable goods.
- Suppliers of electrical power.
- Suppliers of equipment, packaging, spare parts.
- Providers of logistical support, logistics and outsourcing services.
- Providers of consulting, communication and IT services.


Information about our supply chain

[GRI: 102-9]

	Don & Low Ltd	Thrace Nonwoens & Geosynthetics A.B.E.E.	Thrace Ipoma A.D.	Thrace Greiner Packaging S.R.L.	Thrace Greenhouses S.A.	Thrace Polyfilms S.A.	Lumite Inc.	Thrace Synthetic Packaging Ltd.	Thrace Polybulk AS & AB	Thrace Plastics Pack S.A.	Thrace Eurobent S.A.	Thrace Plastics Co S.A.*	Thrace Plastics Packaging DOO
	Total number of suppliers												
2020	526	874	586	409	322	518	413	272	20	913	136	131	95
2019	826	882	716	409	321	452	394	300	20	889	115	137	101
2018	840	1,014	653	431	227	519	371	315	20	866	97	163	103*

Estimated monetary value of total payments to suppliers (€ mil.)													
2020	58.0	86.0	16.5	12.8	5.1	26.0	15.8	13.3	21.4	51.5	5.0	2.9	4.2
2019	57.0	87.0	21.0	14.9	5.3	20.0	16.7	9.0	23.2	45.9	5.4	2.6	3.1
2018	67.0	93.0	24.0	14.4	2.9*	19.5	21.4	9.5	29.4	40.4	2.8	2.0	1.6

	Percentage of expenditure on local suppliers**												
2020	77%	77%	58%	26%	98%	67%	66%	Insignificant percentage of	1%	79%	59%	93%	86%
2019	84%	78%	53%	22%	99%	61%	73%	expenditure on local suppliers. The main suppliers	5%	72%	67%	87%	89%
2018	83%	83%	50%	28%	98.3%	72%	75%	are the subsidiaries of the Group.	5%	75%	62%	88%	93%

* The differentiation in the total number, in comparison to the one mentioned in the financial report issued in 2018, is due to the fact that there was a restatement of the data. ** Changes in the percentages of expenditure on local producers, in comparison to those mentioned in the financial report issued in 2018, are due to a modification in the calculation process.





PEOPLE



Support of local communities and maintenance of active participation and collaboration

[GRI: 413-1]

In the Group, we seek to be informed about the needs of the citizens and the communities where we are operating, through statutory channels of communication and consultation. Through these channels, we receive related requests for the support of social programmes. We assess and prioritize them and we then proceed with the design and implementation of programmes and actions in order to address the real and essential needs of each community, as well as of those which are more aligned with the Sustainable Development strategy of our Group, the number of those who will be benefiting from these actions and the nature of our activities.

Applying a single approach, all of our companies recognize their responsibility towards man and society as a whole. The goal of the Group companies is to:

- Stand out as the most valuable corporate entities for the communities where they are operating and growing, while maintaining the trust they have built over all those years of their coexistence.
- Remain sensitive to the local needs and enhance the quality of life by funding social programmes and institutions.
- Collaborate with important educational institutions to promote innovation and the development of knowledge.
- Bring out and handle significant social issues related to the business practices of the Group.









Social Centre "Stavros Halioris"

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

The purpose of the operation 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.

At the same time, the Social Centre organizes:

- Events, celebrations and excursions of educational and recreational character 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 Centre include:

- 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.
- 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. At the same time, the Centre hosts the meetings of the Open Care Centre for the Elderly of Magiko.

Due to the special circumstances that prevailed due to the pandemic, the Social Centre focused on the support of health units (health centres and the hospital of Xanthi) and social institutions by providing them with equipment and by donating face masks and protective uniforms.

Finally, the current impact of climate change globally demands for actions that the Social Centre will launch in 2022, aiming at raising awareness among the local communities and children regarding ecology and the use of renewable sources of energy.





Total expenditure

2020	2019	2018
€328,623	€273,435	€250,249

For more information you can visit the Center's website: www.kksxalioris.gr





Donations

Moreover, our subsidiary Thrace Greenhouses, driven by the motto "Nothing goes to waste", is developing initiatives to reduce food waste. Since 2020, the company has been collaborating with the non-profit organization Boroume, thus actively supporting food charities throughout Greece. Based on the estimations of the network "Saving & Offering Food", the foodstuffs offered in total, up to now, correspond to 12,596 food portions. Moreover, the company supports the employees of the companies of Thrace Group through the distribution of foodstuffs (www.thracegreenhouses.com/gr/en/aeiforos-anaptiksi/).





We stand together to support vulnerable groups of people!





Thrace Group donates 2,200,000 certified, disposable surgical masks. Desmos records all needs & coordinates the proceedings to the public services. ACS couriers distributes the masks, free of charge, throughout the country.

We stay united in order to provide valable support to vulnerable, high risk groups from the COVID-19 panndemic.

To this day, we have delivered more than 1,000,000 masks to 139 organizations, in 13 regions:



62 Elderly homes & care units



4 Support & hospitality organizations for people with special needs & severe disabilities



15 Child protection institutions



10 Administrative services to the municipality of Xanthi



10 Support organizations for the homeless & underprivileged



,885 People benefitted throughout Greece



38 Health care organizations for the chronically ill





X





Welfare and growth guided by transparency



PROCESS

Creation of financial value and financial performance of the Group Responsible corporate governance and assurance of business ethics and compliance

Assurance of business continuity and preparedness for emergency response





PROCESS

Creation of financial value and financial performance of the Group

[Material topic]



Approach

[GRI: 103-2, A-G3]

In the midst of the global pandemic, we managed to respond successfully to the unprecedented financial and social challenges. Driven by financial discipline, we executed important investments, thus counterbalancing any negative effects, ensuring seamless and continuous operations and creating value for our clients, suppliers and shareholders.





The existing uncertainty in the macroeconomic and financial framework and the volatile business environment constitute a risk factor that we are constantly assessing. Within the framework of smooth operations, the companies of the Group, through their activities in the sectors of packaging, technical fabrics and agriculture, continue to produce and distribute economic value directly or indirectly.

The direct economic value derives from the cash flow that we are creating for our stakeholders and more specifically through the payment of taxes, the payment to suppliers, the payment of salaries to the employees, the shares to the shareholders and the investments in the local communities. At the same time, we are generating indirect economic value by creating, through our operations, indirect work positions, as well as subsequent positions in the wider society.

In total, our positive contribution to the economies of the countries where we are operating is the element that safeguards the further sustainable development of our companies. To this end, we are monitoring our performance on a regular basis and we are aiming at the maximization of our profits in order to continue producing value in a direct and indirect level. To achieve this goal, the strategy of the Group involves an increase in the productive capacity of its companies, a decrease in the production cost, the application of innovative solutions and a turn towards products of increased added value.











[GRI: 103-3, 201-1]

Direct economic value produced & distributed*

	2020	2019	2018
Revenues (€ thousands)	340,891	329,776	325,123
Direct economic value distributed (€ thousand	s)		
Operating Costs	227,245	256,794	249,858
Employee Salaries & Allowances	53,900	57,381	59,918
Payments to Funding Bodies	7,725	6,004	4,366
Payments/Contributions to the State	10,316	3,966	2,926
Investments in Society	329	273	250
Total	299,515	324,418	317,318
Non-distributable economic value (€ thousand	s)		
	41,376	5,358	7,805

* The financial data mentioned above refer to the company Thrace Plastics Co S.A. Moreover, the financial data of the Group for 2019 has been readjusted due to the sale of the company Thrace Ling; however, the present report does not illustrate the related readjustment (more information available in the financial statements of Thrace Group). The difference in the retained economic value that accrued in 2020 in comparison with the previous years is mainly due to the increased profitability of the Group in 2020.



[GRI 102-7]

Shareholders	Number of shares	Holding percentage
Constantinos Halioris	18,936,558	43.29%
Efimia Haliori	9,120,690	20.85%
Institutional investors	6,197,662	14.17%
Others	9,486,542	21.69%
Total	43,741,452	100%

	2020 (€ mil.)	2019 (€ mil.)	2018 (€ mil.)
Liabilities	342.2	323.3	320.2
Total liabilities	167.6	177.0	178.6
Equity	174.5	146.3	141.6
Assets	342.2	323.3	320.2



PROCESS



Responsible corporate governance and assurance of business ethics and compliance

[Material topic]



Approach

[GRI: 103-2, 102-16, 102-11, ESG: A-G1]

In the Group, we have adapted and follow an integrated framework of principles, procedures and policies, which ensure our transparency and responsible operation. To achieve our business goals, we are applying a specific system of corporate governance, through which we are managing administrative and control issues. We are monitoring the compliance of the Group with the legislation and the legislative framework in force and we are also checking the management methods related to the matters of shares of the Group, through the corporate governance system.









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	
Constantinos Halioris	Chairman
Theodoros Kitsos	Vice-chairman, Independent Non-Executive Member
Dimitrios Malamos	Chief Executive Officer, Executive Member
Vasileios Zairopoulos	Non-Executive Member
Christos Schiatis	Non-Executive Member
Athanasios Dimiou	Non-Executive Member
Christos-Alexis Komninos	Non-Executive Member
Georgios Samothrakis	Independent Non-Executive Member
Myrto Papathanou	Independent Non-Executive Member
Spyridoula Maltezou	Independent Non-Executive Member
Nikitas Glykas	Independent Non-Executive Member

*The above reflects the status in 2021.







Committees

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

Georgios Samothrakis	Independent, Non-Executive Member of the Board of Direct
Konstantinos Kotsilinis	Non-Member of the Board of Directors – third party, Membe
Konstantinos Gianniris	Non-Member of the Board of Directors – third party, Membe

SUSTAINABILITY COMMITTEE

Theodoros Kitsos	Vice-chairman, Independent Non-Executive Member of the
Konstantinos Halioris	Chairman of the Board of Directors, Member of the Sustaina
Dimitrios Malamos	Chief Executive Officer, Executive Member of the Board of D
Spyridoula Maltezou	Independent, Non-Executive Member of the Board of Direct

PROVISION AND NOMINATION COMMITTEE

Theodoros Kitsos	Chairman of the Provision and Nomination Committee, Vice
Nikitas Glykas	Member of the Provision and Nomination Committee, Indep
Vasileios Zairopoulos	Member of the Provision and Nomination Committee, Non-E



ctors, Chairman of the Audit Committee

per of the Audit Committee

per of the Audit Committee

e Board of Directors, Chairman of the Sustainability Committee

nability Committee

Directors, Member of the Sustainability Committee

ctors, Member of the Sustainability Committee

e Chairman of the Board of Directors, Independent Non-Executive Member of the Board of Directors

ependent Non-Executive Member of the Board of Directors

-Executive Member of the Board of Directors



Monitoring of Sustainable Development

[GRI: 102-18, ESG: C-G1]

monitoring of their progress towards their implementation.

Code of Conduct

[ESG: C-G2]

We are firmly committed to conducting our business activity with integrity, in accordance with the highest standards of ethics and the laws in effect. The Professional Code of Conduct specifies the standards of behaviour required by the employees of the companies of the Group in every country where Thrace Group is operating. The main theme of the Professional Code of Conduct is summed up as follows: All the employees, as representatives of the Group, shall act with honesty, respect and integrity in all matters at any time. The basic principles of the Code are as follows:



Code of Corporate Governance and Internal Code of Conduct

The Code of Corporate Governance illustrates the optimum practices of social governance that Thrace Group must follow and which govern the main sectors of its operations. It aims at the continuous improvement of the corporate institutional framework and the wider business environment, as well as to the enhancement of the competitiveness of the Group. At the same time, the Internal Code of Conduct serves as the basis for the activity and organization of the Group, in accordance with the legislation in force and the optimum practices.



The primary goal of the Sustainability Committee is the study, pre-approval and recommendation to the Board of Directors of topics related to environmental, social and business sustainability through the development of strategy, management and efficiency, the drawing up of proposals regarding social governance and in general the monitoring of the operations of the Board of Directors, the committees and the administration of the Company. The matters of sustainable development are discussed once per month by the Sustainability Committee, which then conveys them to the rest of the members of the Board of Directors, so that, according to the results of the materiality analysis, priorities can be specified and the related goals and time plans can be set, along with the



Combating corruption [A-G3]

"The Administration of the Group is committed to zero tolerance towards matters of corruption, bribery and extortion and aims at the prevention of such phenomena in all aspects of its activity, by conducting its business activity with integrity in accordance with the highest standards of ethics and the laws in effect."



Within this framework, the Group has enacted policies and principles, while creating mechanisms of control and compliance with the specific policies. Our goal is to enhance and improve the corruption risk management procedures, the compliance with the legislation and the intensification of controls.

More specifically, these procedures are included in:

- The Professional Code of Conduct.
- The Corporate Policy Handbook, which is available electronically or has been distributed as a hard copy to the upper and middle level of administration, while the employees have been trained on it.

In order to avoid incidents of corruption, the Group is taking preventive action, by actualizion related updates and controls, on an annual basis, through the internal audit department. The administrations of the companies are informed of the results of these audits. To discourage any cases of participation in incidents of corruption or/and bribery, the Administration applies disciplinary measures, in order to safeguard the operations of the Group in accordance with the internal regulations.

If any incidents are discovered subsequently, then the Administration of the Group is informed, which decides on any necessary disciplinary actions.



Combating corruption in the supply chain

In the Group, we are aware of the risk of a business partner or supplier getting involved in incidents of corruption and, thus, we undertake all necessary actions, through the due diligence process, to ensure maximum transparency upon the initiation of every new collaboration. Furthermore, we are committed to fighting corruption in our transactions with already existing suppliers and business partners. More specifically, we are mostly collaborating with major multinational companies – about 80% of our collaborations – that give particular emphasis on matters of transparency and combating of corruption and, thus, the collaboration is safeguarded by the rules and policies of the specific suppliers.

Protection of personal data

[ESG: C-G3]

In the Group, we recognize that personal data protection is of crucial importance and thus we respect the privacy of our stakeholders and treat their personal data as strictly confidential, in compliance with the relevant legislation. This way, we seek to restrict the risk of abuse and illegal use of personal data, recognizing that such incidents can cause damage to the operation of the Group and its people. We strictly adhere to the General Data Protection Regulation (GDRP) EU 2016/679, as well as the national legislation Law 4624/2019 concerning the protection of individuals against the processing of personal data and the free movement of such data. Through the compliance programme, since 2018, we have been applying technical and organizational measures to comply with the requirements of the Regulation, along with periodic staff training and implementation audits by the subsidiaries. At Group level, we have designated a Data Protection Officer, who is responsible for the application of best practices concerning secure data processing, transfer and storage, in order to ensure data protection and individual privacy. Moreover, an insurance contract has been established in case of loss personal data.

The Personal Data Protection Statement is available in the website of the Group at <u>www.thracegroup.com/gr/en/privacy-policy/</u>.



[GRI: 103-3, 205-3, ESG: SS-G1]



PROCESS

Assurance of business continuity and preparedness for emergency response

[Material topic]



[GRI: 103-2]

In an ever-changing world of unpredictable circumstances, we are called to manage and assess a range of business and operational risks that might affect our reputation, resilience and broader growth potential. Based on an organized plan of business continuity, we are identifying the risks and their impact, while enhancing our ability for effective emergency response. In order to handle these risks effectively, we are constantly monitoring, specifying and coordinating actions for the limitation of any future risks to safeguard our business continuity, including the strategic planning of our business activities, the protection of our employees, suppliers and clients.

Within this framework, we examined the business risks that the Group might be faced with and created a 5-year business plan. The purpose of the plan, which is inextricably linked with the pillar of the Sustainable Development policy. "Ensuring business continuity and the best financial performance" is about handling risks effectively and preparing for emergency situations, improving recovery times and maintaining our critical productive operations throughout a major crisis.





Handling of environmental issues

We adhere to the legal requirements for the levels of noise, odour, light pollution and vibrations, while providing training programmes to the employees for the proper handling of these parameters. These matters are monitored on a regular basis and preventive or even corrective measures are taken in case it is demonstrated that these parameters are exceeding the permissible limits. In particular, in the facilities of the Group, measurements of these environmental parameters (noise, floating particles etc.) are realized on regular intervals, as these can prove to be harmful factors for the environment and health and safety.

Protection of employees in relation to health and safety

To avoid any accidents that might have a serious impact on human health and the environment, we have detailed instructions, plans, equipment and training programmes in place for the prevention and treatment of work accidents and emergency situations. In all the companies of the Group, emergency drills are performed at least once per year, thus ensuring a high level of preparedness on behalf of the employees. Moreover, within the framework of the protection of the employees from the COVID-19 pandemic, in accordance with the guidelines and recommendations of the World Health Organization and the various national Public Health and Civil Protection organizations, substantial measures were put into effect from the very beginning of the manifestation of the pandemic, which are being assessed on a regular basis in terms of their implementation.





Assurance of the provision and quality of products and services

The maintenance of high product quality is of utmost importance to the Group. The continuous monitoring of risks in the sector of the production process ensures the effective management of the quality of the tasks performed and the products produced, thus keeping intact our response towards the requirements and safety of our customers. Moreover, despite the changing circumstances in the global market, we commit to fulfilling the requirements of our customers regarding the constantly rising demand.

Information safety

The continuous deployment of technology for the support of the business procedures of the Group makes the safeguarding of information confidentiality, integrity and availability essential, along with the need for effective planning for information safety based on risk assessment. Within this framework, through the risk assessment, we identify threats and vulnerable points of our information systems and assess their impact on our business transactions with clients and suppliers, as well as deviations in matters of compliance.



[GRI: 103-3]

Despite the negative effects of the COVID-19 pandemic on a socioeconomic level, the Group, through an organized plan of business continuity, proved to be resilient at all levels of its operations, by achieving to maintain the availability and distribution of all of its products intact, while managing to expand its investment plan through the installation of new production lines and equipment.







What's next

At Thrace Plastics, we are working on a daily basis towards a sustainable future through the transition to a circular economy model, the increase of recycled raw material and the production of sustainable products, as well as through the decrease of energy consumption and the improvement of our environmental footprint via a reduction in the greenhouse gas emissions.











<u>Our pronty</u> the accuracy and completeness of information



INFORMATION AND INDEX TABLES

Stakeholder engagement

Material topic boundaries table

GRI Content Index

ESG metrics table – Athens Stock Exchange 2019

Abbreviation list







INFORMATION AND INDEX TABLES Stakeholder engagement

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

In Thrace Group, we consider the establishment of a dialogue with our stakeholders as being of great importance, as it helps us operate more effectively, comprehend the market circumstances and mitigate any risks. We recognize stakeholders of our Group as anyone significantly affected by our activities and vice versa. Within this framework, we are mapping the stakeholder groups, the decisions of which affect the ability of the Group to apply its strategy and achieve its goals and, on an annual basis, we validate and prioritize them, while at the same time we monitor and improve the methods of consultation with them. Finally, we record the basic needs and expectations of our stakeholders, as these come up through our daily business operations, via the existing channels of communication and consultation with them.

Main groups of stakeholders	Type of communication & engagement	Frequency of communication
Shareholders	Via email, over the phone, in person	Ocassionally
Board of Directors	Via email, over the phone, in person	Ocassionally



Main topics of interest

- Creation of economic value & financial performance of the Group
- Assurance of employee health, safety & wellbeing
- Defence of human rights at work
- Responsible corporate governance & assurance of business ethics & compliance
- Assurance of business continuity & preparedness for emergency response
- Creation of economic value & financial performance of the Group
- Assurance of employee health, safety & wellbeing
- Defence of human rights at work
- Responsible corporate governance & assurance of business ethics & compliance
- Assurance of business continuity & preparedness for emergency response
- Reduction of greenhouse gas emissions
- Provision of innovative & sustainable products within the framework of the circular economy
- Assurance of customer quality, health & safety



Employees	Via email, over the phone, in person	On a daily basis
Clients (B2B)	Via email, over the phone, in person	On a daily basis
Suppliers / Partners	Via email, over the phone, in person	On a daily basis
State & Local Authorities	Via email, over the phone, in person	Ocassionally
NGOs	Events	Ocassionally
Media	Via email, over the phone	Ocassionally
Business associations	Via email, over the phone, in person	Ocassionally
Investment community	Via email, over the phone, in person	Ocassionally



- Creation & safeguarding of employment
- Assurance of employee health, safety & wellbeing
- Defence of human rights at work
- Reduction of greenhouse gas emissions
- Provision of innovative & sustainable products within the framework of the circular economy
- Assurance of customer quality, health & safety
- Assurance of business continuity & preparedness for emergency response
- Creation of economic value & financial performance of the Group
- Assurance of employee health, safety & wellbeing
- Provision of innovative & sustainable products within the framework of the circular economy
- Minimization of waste & maximization of reprocessing and recycling opportunities
- Reduction of greenhouse gas emissions
- Provision of innovative & sustainable products within the framework of the circular economy
- Minimization of waste & maximization of reprocessing and recycling opportunities
- Reduction in water consumption
- Protection & maintenance of biodiversity
- Provision of innovative & sustainable products within the framework of the circular economy
- Assurance of customer quality, health & safety
- Creation & safeguarding of employment
- Support of the local community & maintenance of active participation and collaboration
- Provision of innovative & sustainable products within the framework of the circular economy
- Assurance of customer quality, health & safety
- Assurance of employee health, safety & wellbeing
- Provision of innovative & sustainable products within the framework of the circular economy
- Creation of economic value & financial performance of the Group
- Responsible corporate governance & assurance of business ethics & compliance



TABLES AND INDICATORS Material topic boundaries table

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

	1. Why is the topic material		2. Boundaries of the material topic	
Material topic	Broader economic, social or/and environmental impact caused by this topic	Stakeholders directly affected (financially, socially or/and environmentally) 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 the circular economy	3 BOOLSELTS AND WILLERSE Market LEESE Market L	 Shareholders Employees Clients Suppliers / Partners 		 Customers Suppliers / Partners State & Local Authorities Local & Wider Society Business Associations Investment Community
Minimization of waste & maximization of reprocessing & recycling opportunities	3 ACCOUNSELTS 6 ALLAN KOTER 8 ECCOUNCE SOURCE AND -///- 6 ALLAN KOTER 8 ECCOUNCE SOURCE FOR AND 9 MEDITOR MACHINE 11 MEDITARAMEETERS 12 ECCOUNCE SOURCE FOR AND 13 CLIMPER 14 UELSWINKER 15 UELSKINKER I ISCOUNSELTS 15 UELSKINKER	 Shareholders Employees Clients Suppliers / Partners 		 Customers Suppliers / Partners State & Local Authorities Local & Wider Society Business Associations Investment Community
Reduction of greenhouse gas emissions	13 CLARE CONSTRUCTION CONSTRUCTION	 Shareholders Employees Suppliers / Partners 		 Customers Suppliers / Partners State & Local Authorities Business Associations Investment Community





Creation and safeguarding of employment	8 BEEEN WORK AND ECONOMIC CREWYR	 Employees Customers Suppliers / Partners 	~	• Customers
Defence of human rights at work	5 EBALLY	 Employees Suppliers / Partners Business Associations 	~	 Customers Suppliers / Partners
Assurance of employee health, safety & wellbeing	3 GOOD MERITY AND WILL READS 	 Employees Customers Suppliers / Partners 	~	 Customers Suppliers / Partners
Assurance of client quality, health & safety	3 GOOD SEALTS AND WILL BEING 	ShareholdersEmployeesCustomers	~	 Customers Suppliers / Partners
Creation of economic value and financial performance of Group	8 IEEENI WORK AND IEEENING CRAWTHE IEEENING CRAWTHE IEEEN	 Shareholders Employees Suppliers / Partners 	~	 Customers Suppliers / Partners
Responsible corporate governance & assurance of business ethics & compliance	8 EESEM WORK AND ECONOMIC SERVITE IIII 16 ARG STRONG INSTITUTIONS IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	 Shareholders Employees Customers Suppliers / Partners 	•	 Customers Suppliers / Partners State & Local Authorities Investment Community Business Associations
Assurance of business continuity & preparedness for emergency response	9 MECHANANANAN Kabanananan Kabanananan	 Shareholders Employees Customers Suppliers / Partners 	~	 Customers Suppliers / Partners





TABLES GRI Content Index

[GRI: 102-55]

GRI Standard	Disclosure	Page / Citation	Omission
GENERAL STANDARD DISC	LOSURES ("Core")		
	102-1 Name of the organization	13, 14	
	102-2 Activities, brands, products and services	13, 14, 17-20	
	102-3 Location of headquarters	13, 14	
	102-4 Location of operations	13, 14, 17-20	
	102-5 Ownership and legal form	13, 14	
	102-6 Markets served	8, 13, 17-20	
GRI 102: General Standard	102-7 Scale of the organization	8, 14, 49, 79	
Disclosures 2016	102-8 Information on employees and other workers	49	
	102-9 Supply chain	72-73	
	102-10 Significant changes to the organization and its supply chain	4, 5, 15	
	102-11 Precautionary Principle or approach	38, 67, 80	
	102-12 External initiatives	21, 22	
	102-13 Membership of associations	21, 22	
	102-14 Statement from senior decision-maker	4, 5	





GENERAL STANDARD DISCLOSURES ("Core")

	102-16 Values, principles, standards and norms of behaviour
	102-18 Governance structure
	102-40 List of stakeholder groups
	102-41 Collective bargaining agreements
	102-42 Identification and selection of stakeholders
	102-43 Approach to stakeholder engagement
	102-44 Key topics and concerns raised
GRI 102: General Standard Disclosures 2016	102-45 Entities included in the consolidated financial statements
	102-46 Definition of report content and topic boundaries
	102-47 List of material topics
	102-48 Restatements of information
	102-49 Changes in reporting
	102-50 Reporting period
	102-51 Date of most recent report



Page / Citation

Omission

11, 12, 80
81-83
90-91
51
90
90-93
92
6, 14
92
92
In case of restatements of information in relation to the previous report issued, these are pointed out in the text through corresponding footnotes.
There were no changes in the reporting process.
6, 7
01/01/2019-31/12/2019



GRI Standard	Disclosure	Page / Citation	Omission
GENERAL STANDARD DISCLOSURES ("Core")			
	102-52 Reporting cycle	6	
	102-53 Contact point for questions regarding the report	6	
GRI 102: General Standard Disclosures 2016	102-54 Claims of reporting in accordance with the GRI Standards	6	
	102-55 GRI Content index	94	
	102-56 External assurance	6	
MATERIAL TOPICS			
Provision of innovative and sustainable pro	oducts within the framework of the circular economy		
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	30	
	103-3 Evaluation of the management approach	34-35	
GRI 301: Materials 2016	301-1 Materials used by weight or volume	35	
	301-2 Recycled input materials used	35	
Minimization of waste and maximization o	f reprocessing and recycling opportunities		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	92	

GRI Standard	Disclosure	Page / Citation	Omission
GENERAL STANDARD DISCLOSURES ("Core")			
	102-52 Reporting cycle	6	
	102-53 Contact point for questions regarding the report	6	
GRI 102: General Standard Disclosures 2016	102-54 Claims of reporting in accordance with the GRI Standards	6	
	102-55 GRI Content index	94	
	102-56 External assurance	6	
MATERIAL TOPICS			
Provision of innovative and sustainable provision of innovative and sustainable provision of the provision o	oducts within the framework of the circular economy		
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	30	
	103-3 Evaluation of the management approach	34-35	
CPI 201, Materials 2016	301-1 Materials used by weight or volume	35	
GRI 301: Materials 2016	301-2 Recycled input materials used	35	
Minimization of waste and maximization o	f reprocessing and recycling opportunities		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	92	





GRI 103: Management Approach 2016	103-2 The management approach and its components	36	
OKI 103. Management Approach 2010	103-3 Evaluation of the management approach	37	
GRI 306: Effluents and Waste 2016	306-2 Management of significant waste-related impacts	37	
Reduction of greenhouse gas emissions			
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	38	
	103-3 Evaluation of the management approach	40-44	
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	38	
	305-1 Direct (Scope 1) GHG emissions		
GRI 305: Emissions 2016	305-2 Energy indirect (Scope 2) GHG emissions	41-42	The information for the specific disclosure refers to the three major subsidiaries of the Group
	305-3 Other indirect (Scope 3) GHG emissions		subsidiaries of the Group
	302-1 Energy consumption within the organization	44	
GRI 302: Energy 2016	302-3 Energy intensity	44	The information for the specific disclosure refers to the three major subsidiaries of the Group
Creation and safeguarding of employme	ent		
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	47-48	
	103-3 Evaluation of the management approach	49-52	
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	51	





Defence of human rights at work			
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	54-57	
	103-3 Evaluation of the management approach	58	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	58	
Assurance of employee health, safety and v	vellbeing		
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	59-61	
	103-3 Evaluation of the management approach	63-65	
	403-1 Occupational health and safety management system	59-61	
	403-2 Hazard identification, risk assessment and incident investigation	59-61	
CDI 402. Occupational Health and Safety 2019	403-3 Occupational health services	59-61	
GRI 403: Occupational Health and Safety 2018	403-4 Worker participation, consultation and communication on occupational health and safety	59-61	
	403-5 Worker training on occupational health and safety	59-61	
	403-6 Promotion of worker health	59-61	





	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	59-61
GRI 403: Occupational Health and Safety 2018	403-8 Workers covered by an occupational health and safety management system	59
	403-9 Work-related injuries	63
	403-10 Work-related ill health	63
Assurance of customer quality, health and	safety	
	103-1 Explanation of the material topic and its boundaries	92
GRI 103: Management Approach 2016	103-2 The management approach and its components	67-71
	103-3 Evaluation of the management approach	71
GRI 416: Customer Health and Safety 2016	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	71
Creation of economic value and economic	performance of the Group	
	103-1 Explanation of the material topic and its boundaries	92
GRI 103: Management Approach 2016	103-2 The management approach and its components	78
	103-3 Evaluation of the management approach	79
	201-1 Direct economic value generated and distributed	79
GRI 201: Economic Performance 2016	201-2: Financial implications and other risks and opportunities due to climate change	38





Responsible corporate governance and assurance of busing	ness ethics and compliance		
GRI 103: Management Approach 2016	103-1 Explanation of the material topic and its boundaries	92	
	103-2 The management approach and its components	80-85	
	103-3 Evaluation of the management approach	85	
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and action taken	85	
Assurance of business continuity and preparedness for emergency response			
Assurance of business continuity and preparedness for e	mergency response		
Assurance of business continuity and preparedness for e	mergency response 103-1 Explanation of the material topic and its boundaries	92	
Assurance of business continuity and preparedness for e GRI 103: Management Approach 2016		92 86	
	103-1 Explanation of the material topic and its boundaries		

Responsible corporate governance and assurance of business ethics and compliance			
	103-1 Explanation of the material topic and its boundaries	92	
GRI 103: Management Approach 2016	103-2 The management approach and its components	80-85	
	103-3 Evaluation of the management approach	85	
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and action taken	85	
Assurance of business continuity and preparedness for emergency response			
Assurance of business continuity and preparedness for er	nergency response		
Assurance of business continuity and preparedness for en	nergency response 103-1 Explanation of the material topic and its boundaries	92	
Assurance of business continuity and preparedness for er GRI 103: Management Approach 2016		92 86	
	103-1 Explanation of the material topic and its boundaries		



TABLES ESG metrics table – Athens Stock Exchange 2019

ESG classification	ID	Metric title	Page / Citation	Omission
Core metrics				
	C-E1	Scope 1 emissions	41-42	The information for the specific disclosure refers to the three major subsidiaries of
Environment	C-E2	Scope 2 emissions	41-42	the Group
	C-E3	Energy consumption within the organization	44	
	C-S1	Female employees	58	
	C-S2	Female employees in management positions	58	
	C-S3	Turnover rates	52	
	C-S4	Employee training	51	
Society	C-S5	Human rights policy	54	
	C-S6	Collective bargaining agreements	51	
	C-S7	Supplier assessment	72	Refers to ThracePolybulk, while the Group is in the process of creating a single Policy for the evaluation of the suppliers that will taken into consideration ESG criteria
	C-G1	Sustainability oversight	83	
Corporate governance	C-G2	Business ethics policy	83	
	C-G3	Data security policy	85	





Advanced metrics

Environment	A-E1	Scope 3 emissions
	A-E2	Climate change risks and opportunities
	A-S1	Stakeholder engagement
	A-S2	Employee training expenditure
Society	A-S3	Gender pay gap
	A-S5	Sustainable product revenue
	A-G1	Business model
	A-G2	Materiality
Corporate governance	A-G3	ESG targets
	A-G4	Variable pay

Sector-specific metrics

	SS-E1	Emission strategy
Environment	SS-E5	Waste management
	SS-E6	Environmental impact of packaging
	SS-E8	Critical materials
	SS-S1	Product recalls
Society	SS-S6	Health and safety performance
Corporate governance	SS-G1	Business ethics violations



41	This information refers to the three major subsidiaries of the Group.
38	
90-91	
52	
58	
40	The information published refers exclusively to the subsidiary Thrace Greenhouses
11, 12, 80	
26	
30, 32, 34, 38, 45, 48, 59, 60, 78, 84	Short-term and long-term targets are included in this Report and in specific sections
55	

38, 40-41	
37	
31	
31	
71	
63	
85	



TABLES **Abbreviation list**

GRI (Global Reporting Initiative)	International reporting standard of
BRC (Brand Reputation Compliance)	International standard for food safe
CDP (Carbon Disclosure Project)	International non-profit organization
EcoVadis	Ratings of the quality of the Corpor
EPD (Environmental Product Declaration)	Quantifies environmental informatio
In the Loop	A platform for the upcycling of plas
LCA (Life Cycle Assessment)	Methodology for assessing environr
SASB (Sustainability Accounting Standards Board)	International reporting standard of
SBTi (Science Based Targets initiative)	International initiative that provides to the goals set in the Paris Agreem
SDGs (Sustainable Development Goals)	A collection of 17 interlinked global
TCFD (Task Force on Climate-Related Financial Disclosures)	International initiative that develops
tCO₂e	It refers to the total greenhouse gas
Film FFS	Conversion of film sheet in sack pac



f sustainable development

fety

on that helps companies publish their environmental impact

orate Social Responsibility management system

ion on the life cycle of a product

astic waste

nmental impacts associated with all the stages of the product life cycle

f sustainable development

es companies with a clear methodology for the reduction of emissions according ment.

al goals designed to be a "blueprint to achieve a better and more sustainable future for all

ps recommendations for more effective disclosures related to the climate change

as emissions in tons of CO₂ equivalent

ackaging







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