



SUSTAINABLE DEVELOPMENT POLICY

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1. Purpose

Thrace Plastics Co S.A. (hereinafter "Company") has implemented specific policy regarding social, environmental and corporate governance issues (hereinafter referred to as "Sustainable Development Policy"). At the core of the Sustainable Development Policy, the Company has a vision to be the most valuable partner for its customers and suppliers and at the same time to increase its share value, always taking care of the well-being of all its people. In this context, the Company seeks the implementation of practices to promote Sustainable Development and is committed through its policies to show respect for the human factor, society and the environment, in order to remain a reliable social partner. Our approach to Sustainable Development is based on six pillars: (1) We operate with respect for the environment, (2) We contribute to the Circular Economy and the Economy of New Plastics, (3) We create value for our people, (4) We contribute in the local community, (5) We operate with transparency and integrity, (6) We ensure business continuity and optimal financial performance. The main risks and their management, the Company's performance and its commitments under the 17 Sustainable Development Goals are described in detail in the annual Sustainable Development Reports and the Non-Financial Information Reports. The recording and communication of all the above issues to the interested parties is in line with international and national standards and indicators, aiming at reliable and transparent information.



2. Implementation and Monitoring

This policy is in line with the requirements of the existing legislative and regulatory framework.

In addition, the Company in the context of preparation and implementation of this policy, has taken into account and has voluntarily adopted international standards and principles, with emphasis on:

- the "Agenda 2030" of the United Nations (UN) with the 17 Sustainable Development Goals adopted in September 2015 by the 193 UN Member States,
- the ESG 2019 Information Disclosure Guide of the Athens Stock Exchange,
- the United Kingdom Modern Slavery Act 2015.

The monitoring of the implementation of the Sustainable Development Policy is the responsibility of the Sustainability Committee at the Board of Directors level, while at the administrative level, of the Sustainable Development Team. In this context, the Internal Audit Service can assist through periodic audits. The Sustainable Development Policy was approved by a decision of the Board of Directors, is reviewed on an annual basis and is available on the corporate website. The Board of Directors and / or the Internal Audit Service may suggest the revision of the Sustainable Development Policy and any amendment thereto shall be adequately documented and accompanied by the approval of the Board of Directors. The rules, commitments and principles contained in the Corporate Governance Code, the Code of Ethics and Conduct, the Internal Rules of Operation, the Safety, Health, Environment Policy, Social Contribution Policy and Product Quality Policy in each relevant policy or code adopted and implemented by the Company, remain in force, and are applied in parallel with this policy. Everything mentioned in this policy is applied and monitored in the same way for the Company and for all its subsidiaries.



3. Scope

This Sustainable Development Policy:

- Binds the Company and all its subsidiaries and covers all the activities of the Company in Greece and abroad, including all operations carried out by the Company or its subsidiaries.
- Applies to all members of the Board of Directors, senior executives, employees of the Company and its subsidiaries, and in general all persons employed in the Company or its subsidiaries either through an employment contract or through another contractual relationship.
- Is disclosed to third parties providing services to the Company (supply chain) or acting on its behalf or in cooperation with it (value chain), including partners and suppliers and any other persons with whom the Company cooperates under outsourcing contracts or other agreements.



4. Stakeholders

Stakeholders are the environment (direct and indirect), which interacts with the Company and is interested in its activities. Interested parties are defined as those

entities that either have a direct or indirect impact on the Company and its activities or respectively are recipients of the direct or indirect impact arising from the Company and its activity. The Company maps the groups of stakeholders that influence with their decisions its ability to implement its strategy and achieve its goals. On an annual basis, it validates the stakeholder groups, improves the methods of communication and consultation with them and records their basic needs and expectations as they arise from its operation. For the Company, the establishment of the dialogue with the interested parties is very important, as it contributes to its effective operation through the understanding of the market conditions and the mitigation of potential risks.



5. Corporate Governance and Business Ethics

The Company has adopted and follows a comprehensive framework of principles, procedures and policies that ensure its transparency and responsible operation.

Corporate Governance

Through the established corporate governance system, the Company administers the management and control issues, monitors the compliance with the current legislation and the legal framework and controls the management methods related to shareholder issues. This system is framed by the Corporate Governance Code applied by the Company. Regarding corporate governance, the Company has set up a Sustainability Committee, where members of the Board of Directors are part of. The Committee is accountable to the Board of Directors for the supervision and the proper process of implementation of the Company's sustainable development strategy, which concerns policies, goals, actions and results in environmental, social and ethical issues related, both internally and with the external environment of the Company. At the administrative level, a Sustainable Development Team has been appointed, which includes executives from various departments of the Company as well as representatives of the Subsidiaries and which supports the Company's Management in the implementation of its strategy for sustainable development. The Team is coordinated by the Chief Sustainability Officer.

Fight against Corruption and Bribery

The Company is committed to zero tolerance in matters of corruption, bribery and extortion and aims to prevent such phenomena in all aspects of its activity,

conducting its business with integrity, in accordance with the highest standards of ethics and applying applicable laws.

The Company has established the Code of Ethics and Conduct, which defines the standards of conduct required of all employees and includes basic principles, the observance of which aims to prevent and/or eliminate corruption. The Code of Ethics and Conduct is available to all employees through the corporate website. In addition, the internal audit department, in the context of its various audits, includes targeted audits in this regard to avoid any incidents of corruption.

Respect for Human Rights

The Company and all those who represent, cooperate and/or are employed in it must comply with the Code of Ethics and Conduct applied by the Company and everything mentioned in it regarding the respect of human rights. The Company is committed to zero tolerance, in terms of harassment in the workplace, in any form of discrimination based on race, religion, gender, nationality, age, disability, sexual orientation, etc., in cases of forced and child labor in both the Company itself, as well as to its subsidiaries.

Suppliers' Ethics and Conduct

The Company recognizes the necessity of applying the principles of ethics and conduct, to which it is committed, in its supply chain. In this context, there is a continuous effort to evaluate its suppliers and partners in accordance with their social and environmental commitments and performance, thus ensuring the risk of deviation from good social and environmental standards, which include issues of work practices and human rights. as well as the fight against corruption. At the same time, the Company has fully implemented the Modern Slavery Act of the United Kingdom of 2015 and has zero tolerance in relation to its violation.



6. Social Responsibility

The Company seeks, through its business activities, to achieve high performance, to produce and distribute directly or indirectly economic value to the society in which it operates, with particular emphasis:

- On strengthen the economies of the countries in which it operates, through the cash flows it creates to stakeholders and in particular tax payments,

payments to suppliers, payroll payments to employees, dividends to shareholders and investments in local communities.

- On the needs of the citizens and the societies that frame the Company and are influenced by its activities.
- On the employment, through the direct and indirect creation and / or maintenance of jobs throughout the value chain of the Company.

Quality, Safety and Customer Service

The Company prioritizes the quality of its products and the safety of its customers and has established a Product Quality Policy. The Company complies with the respective national laws and adopts international norms, safety rules, best practices and standards, regarding the design and production of products in all its facilities, monitoring and eliminating any unfortunate effects on the health and safety of customers and end users. The products are controlled in all phases of the production process and the Company has adopted management systems and quality assurance procedures in accordance with international standards.

Labor Issues

The Company recognizes the value created by human capital and considers it crucial for the good quality of its products, the high productivity and the achievement of its competitive advantage. Investing in its people is a priority, by encouraging lifelong learning, collaboration, initiative and personal achievement.

In order to ensure a responsible working environment of well-being, the Company has established the Code of Ethics and Conduct, various company directives, internal regulations and policies related to human and labor rights, health, safety and well-being of human resources, evolution and development of its potential and zero tolerance of harassment, all forms of discrimination, forced and child labor. The Company also respects the privacy of its employees by keeping all their personal information confidential and the Top Management promotes in various ways the assurance and enhancement of employee benefits, providing a working environment of equal opportunities for all. The priority is to minimize the possibility of causing an accident at work or illness and that is why the implementation of the Safety, Health, Environment Policy has been systematically

developed and monitored.

Social contribution

The Company has established a unified Social Contribution Policy, through which all subsidiaries recognize their responsibility to the society. The Sustainable Development Team is in constant collaboration with executives of the subsidiaries, in order to plan, coordinate and implement, jointly, social actions and initiatives for public benefit purposes. In order to make a practical contribution to the local community, the "Stavros Halioris Social Center" has been established, which constitutes a prominent example for the Company, with actions and activities of educational, cultural, recreational and social content.



7. Environmental Liability

The Company has an Safety, Health, Environmental Policy always guided by the improvement of the environmental impacts resulting from its operation, with commitment to the application of the principles of circular economy, responsible waste management, reduction of energy consumption and reduction of greenhouse gas emissions.

Circular Economy

The plastics industry faces a variety of challenges and opportunities. For this reason, the Company has adopted the principles of the circular economy from the supply of raw materials and product design, incorporating practices based on the principles of reduction, reuse and recycling, up to the entire life cycle of its products. The adoption of a new, innovative, circular economy model is a very important initiative by the Company, recognizing its contribution to the efficient use of resources, as an important link in the global plastic value chain. In this context, the Company is committed, in terms of responsible supply of raw materials and saving of natural resources, to replace 8,500 tons of raw material with recycled plastic by 2025. At the same time, the Company monitors with relevant measurement indicators and improves where possible its environmental performance. Furthermore, it fully complies with the legal requirements for waste management, storage, transport, recycling and disposal, ensuring their proper management through partnerships with certified bodies and organizations, while, at the same time, it participates in global alliances.

Climate Change

The Company recognizes the risks and impacts that may arise in its business activity due to climate change, such as the occurrence of extreme weather events or rising temperatures, which may affect the production process and bring about significant changes in its activities and abrupt changes in its income and expenses in the short, medium and long term. To mitigate the risks arising from climate change, but also to achieve positive financial results for itself and its operating environment, the Company adapts its business model to reduce its carbon footprint (direct emissions, energy consumption, use of recycled material, waste management) and focus on the development of innovative products and services, applying the principles of the circular economy.