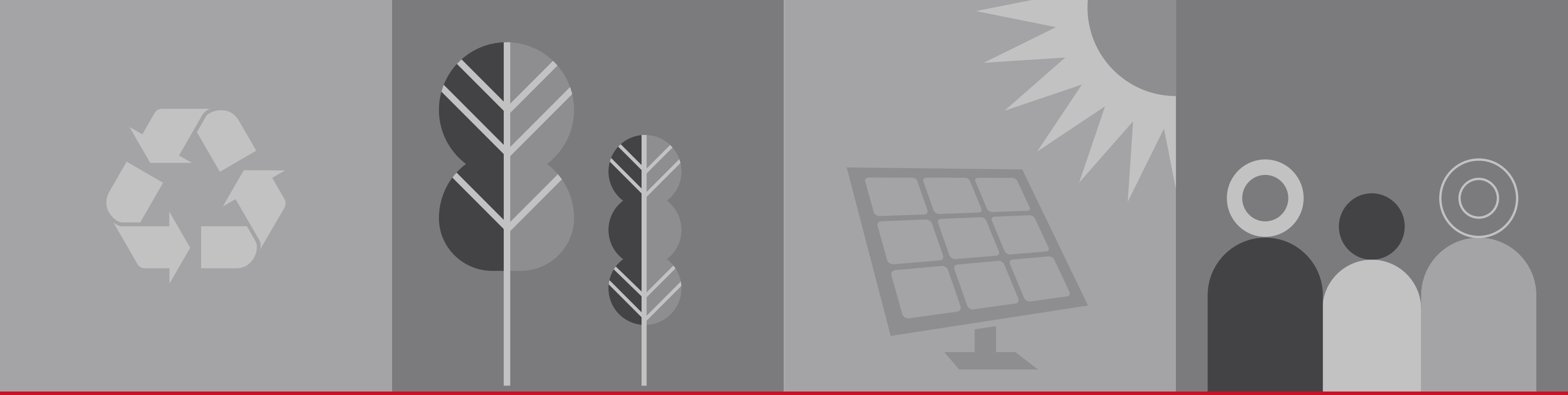


THRACE PLASTICS CO S.A.

23

ANNUAL FINANCIAL REPORT

01.01-31.12.2023

www.thracegroup.gr

General Commerce Reg. No. 12512246000
Domicile: Magiko, Municipality of Avdira, Xanthi Greece
Offices: 20 Marinou Antypa Str., 174 55 Alimos, Attica Greece

THRACE GROUP

The Group

Comprises of
14 companies
worldwide engaged in active operations

Engages in
3 business units
Technical Fabrics
Packaging Solutions
Hydroponic agriculture

Covers
25 market segments
with products and solutions

Employs
2,091 employees
including joint ventures

Develops a sales network in
80 countries

Implements
28 technologies
in production processes

Operates in
9 countries
with production, marketing, and distribution companies

Group's net sales amount to
€345 mil.

Supports circular economy principles with
120 product groups

Operates
10.8 MW
photovoltaic net metering systems

Processes over
110,000 MT
of raw materials from polypropylene and polyethylene

Committed in 2018 to replace
8,500 MT
of virgin raw material with recycled by 2025

Utilizes
12,976 MT
of recycled material from production residues and external sources

Reuses
100%
of internally generated production waste

Produces
100%
recyclable products

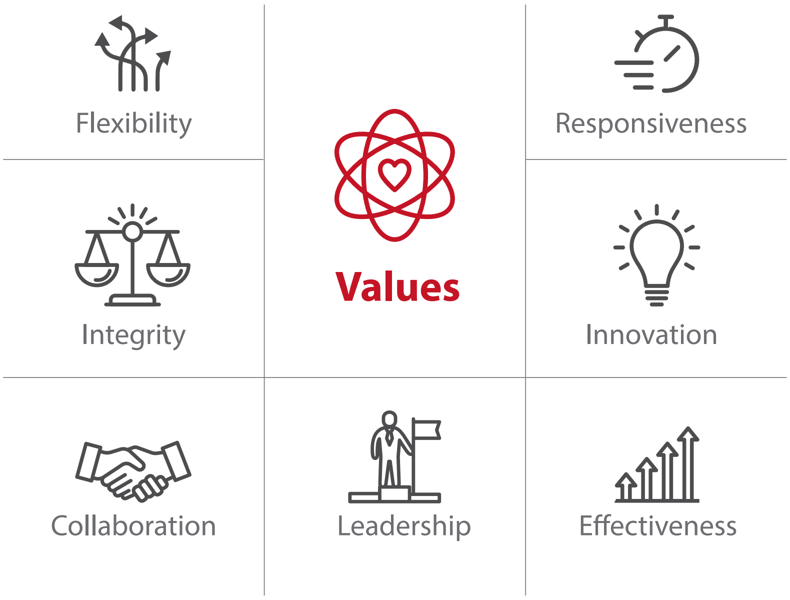
Vision

[ATHEX ESG: A-G1]

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

Mission

- Adhering closely to our Group core values: integrity, focus on results, innovation, flexibility, responsiveness, cooperation, leadership.
- Investing in our people, by encouraging lifelong learning, individuality, personal initiatives and self-achievement.
- Creating new business standards through innovation and smart thinking, aiding our customers' leadership in their markets.
- Providing not just products but complete & innovative solutions, tailor-made upon our customers' specific requirements and needs.
- Acting local – being global, serving thousands of companies worldwide through strategic geographic dispersion.
- Pursuing profitability through organic growth and strategic acquisitions.
- Achieving competitive prices through economies of scale, vertical integration and internal synergies.
- Combining diverse high-end technologies with a long know-how and an extensive experience in the markets we operate.
- Respecting our global environment and the societies where we work and live.
- Adapting to the ever-changing market environment and promptly adjusting our practices to successfully meet the global trends that will shape the future of business, economy and society.



History

1977

In 1977, Stavros Halioris founded the company Thrace Plastics SA in Xanthi

1995

In 1995, the company was listed on the Athens Stock Exchange

1997 - 2014

From 1997 to 2014, companies that now constitute the Thrace Group were established or acquired, with active commercial and/or production activities in the technical fabrics and packaging sectors: Thrace Nonwovens & Geosynthetics SA, Thrace Polyfilms SA, Thrace Eurobent SA (as a joint venture), Thrace Pack SA, Don & Low Ltd (Scotland), Thrace Synthetic Packaging Ltd (Ireland), Thrace Ipoma SA (Bulgaria), Thrace Greiner Packaging SRL (as a joint venture, Romania), Thrace Polybulk AB (Sweden), Thrace Polybulk AS (Norway), Thrace Plastics Packaging DOO (Serbia), Lumite Inc (as a joint venture, USA)

2013

In 2013, in collaboration with Elastron SA, Thrace Greenhouses were founded, utilizing the geothermal fields of Xanthi

2017

From 2017, following internal restructuring, the company Thrace Plastics SA continued to operate as Thrace Plastics Holding SA

2021

From 2021, commencement of an investment plan in photovoltaic systems

2022

From 2022, a central recycling line has been in operation

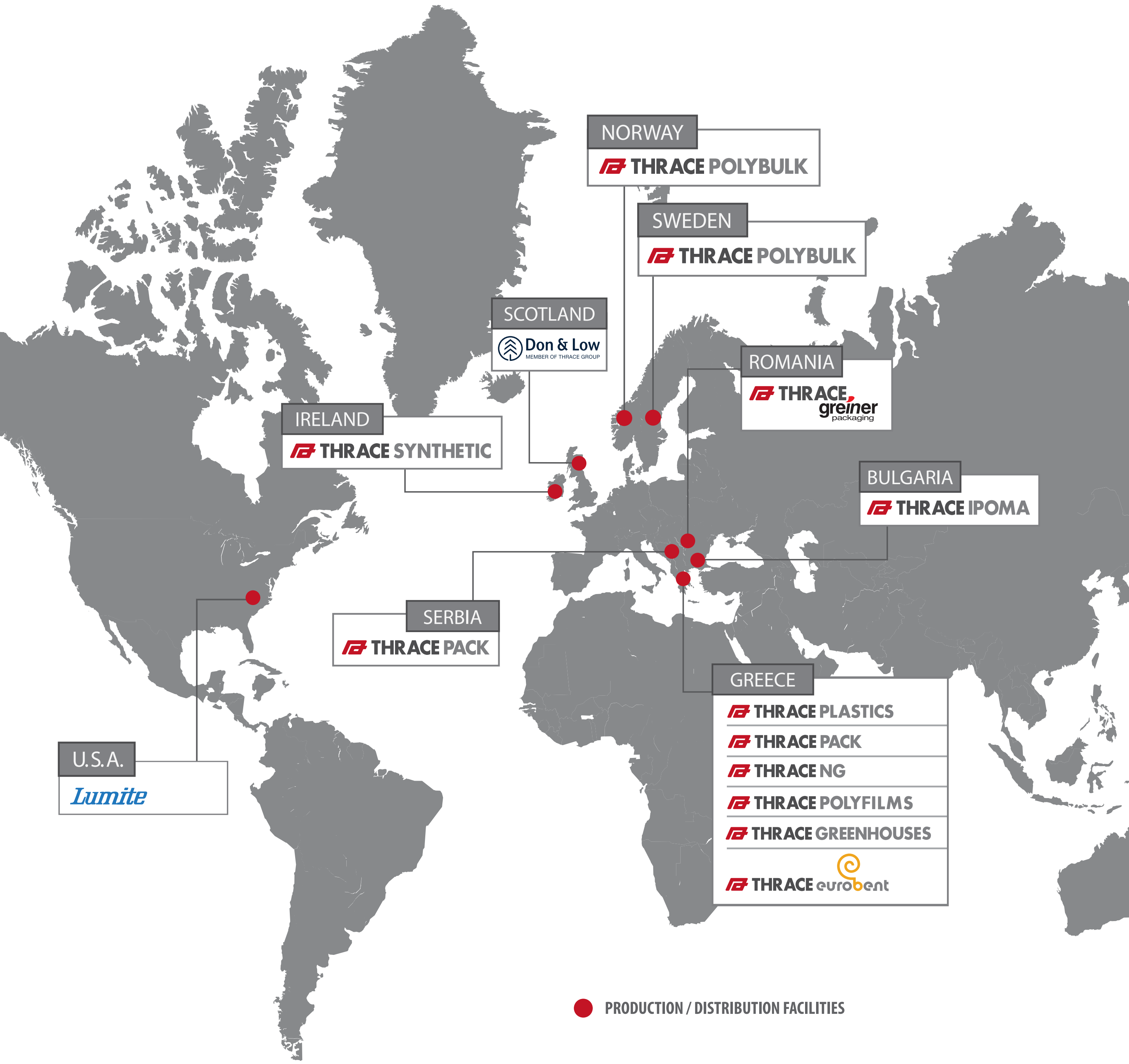
Domestic and international presence

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

The Group consists of 14 companies engaged in commercial and/or manufacturing activities.

Companies	Headquarters
Thrace Plastics Company SA	Xanthi, Greece
Thrace Nonwovens & Geosynthetics SA	Xanthi, Greece
Thrace Polyfilms SA	Xanthi, Greece
Thrace Eurobent SA	Xanthi, Greece
Thrace Pack SA	Ioannina/Xanthi, Greece
Thrace Greenhouses SA	Xanthi, Greece
Don & Low Ltd	Forfar, Scotland
Thrace Synthetic Packaging Ltd	Clara, Ireland
Thrace Ipoma SA	Sofia, Bulgaria
Thrace Greiner Packaging SRL	Sibiu, Romania
Lumite Inc	Georgia, USA
Thrace Polybulk AB	Köping, Sweden
Thrace Polybulk AS	Brevik, Norway
Thrace Plastics Packaging DOO	Nova Pazova, Serbia

Thrace Eurobent SA, Thrace Greenhouses SA, Thrace Greiner Packaging SRL, and Lumite Inc are joint ventures of the Group; however, the overall data concerning non-financial performance indicators are included, as they apply common principles of sustainable development with the Group.

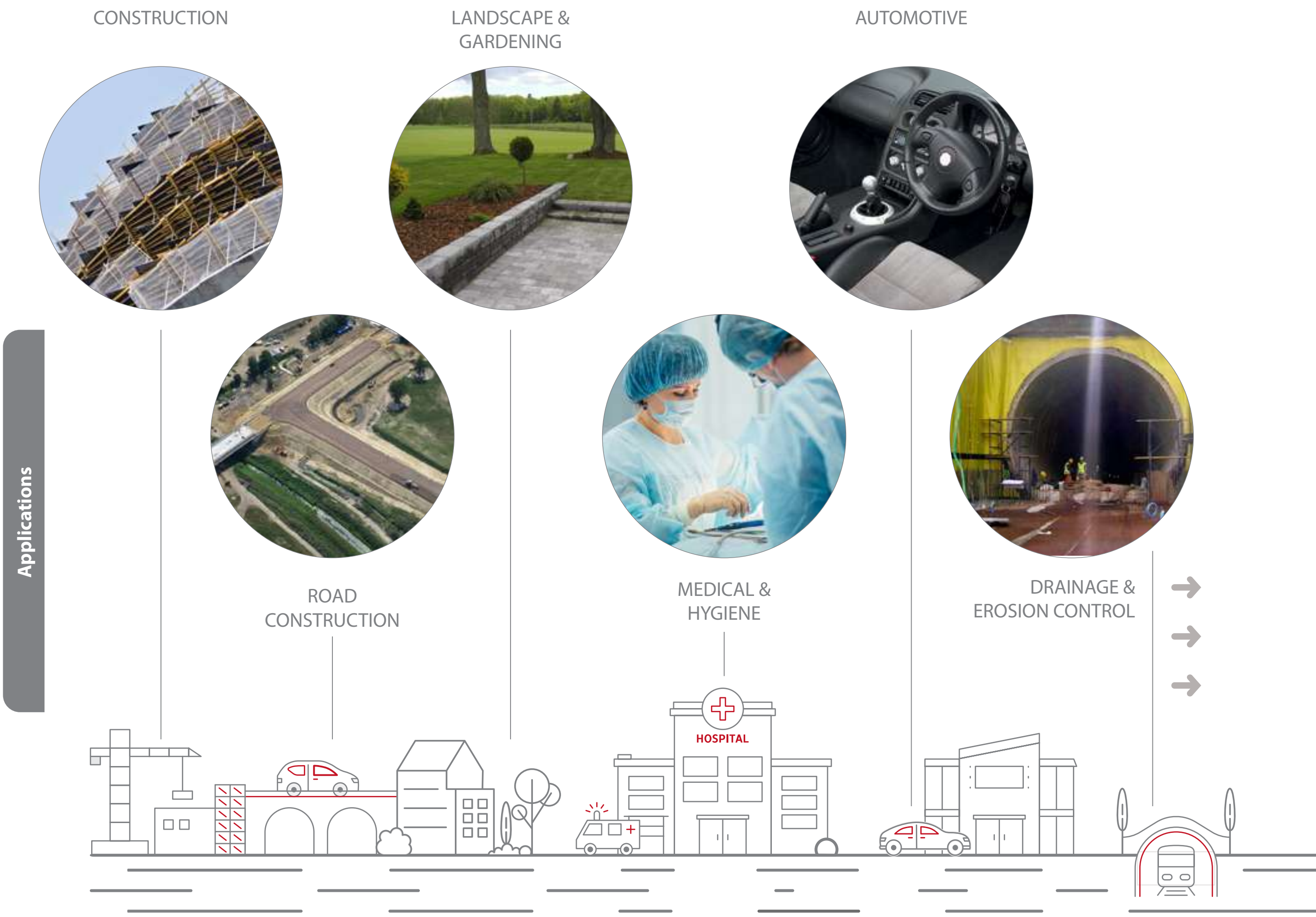

NORWAY
THRACE POLYBULK
SWEDEN
THRACE POLYBULK
SCOTLAND
Don & Low
MEMBER OF THRACE GROUP
ROMANIA
THRACE greiner packaging
IRELAND
THRACE SYNTHETIC
BULGARIA
THRACE IPOMA
SERBIA
THRACE PACK
GREECE
THRACE PLASTICS
THRACE PACK
THRACE NG
THRACE POLYFILMS
THRACE GREENHOUSES
THRACE eurobent
U.S.A.
Lumite
PRODUCTION / DISTRIBUTION FACILITIES

Business sectors of activity

TECHNICAL FABRICS SECTOR

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

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



THRACE NG | THRACE eurobent | Don & Low MEMBER OF THRACE GROUP

GREECE | SCOTLAND

Product Families

- Geotextiles (woven, nonwoven)
- Geogrids
- Geocomposites
- Fabrics
- Membranes
- Film
- Nets
- Strapes
- Ropes
- Yarns
- Fibres

THRACE SYNTHETIC
IRELAND

THRACE POLYBULK
NORWAY & SWEDEN

Lumite
USA

Business sectors of activity

PACKAGING SECTOR

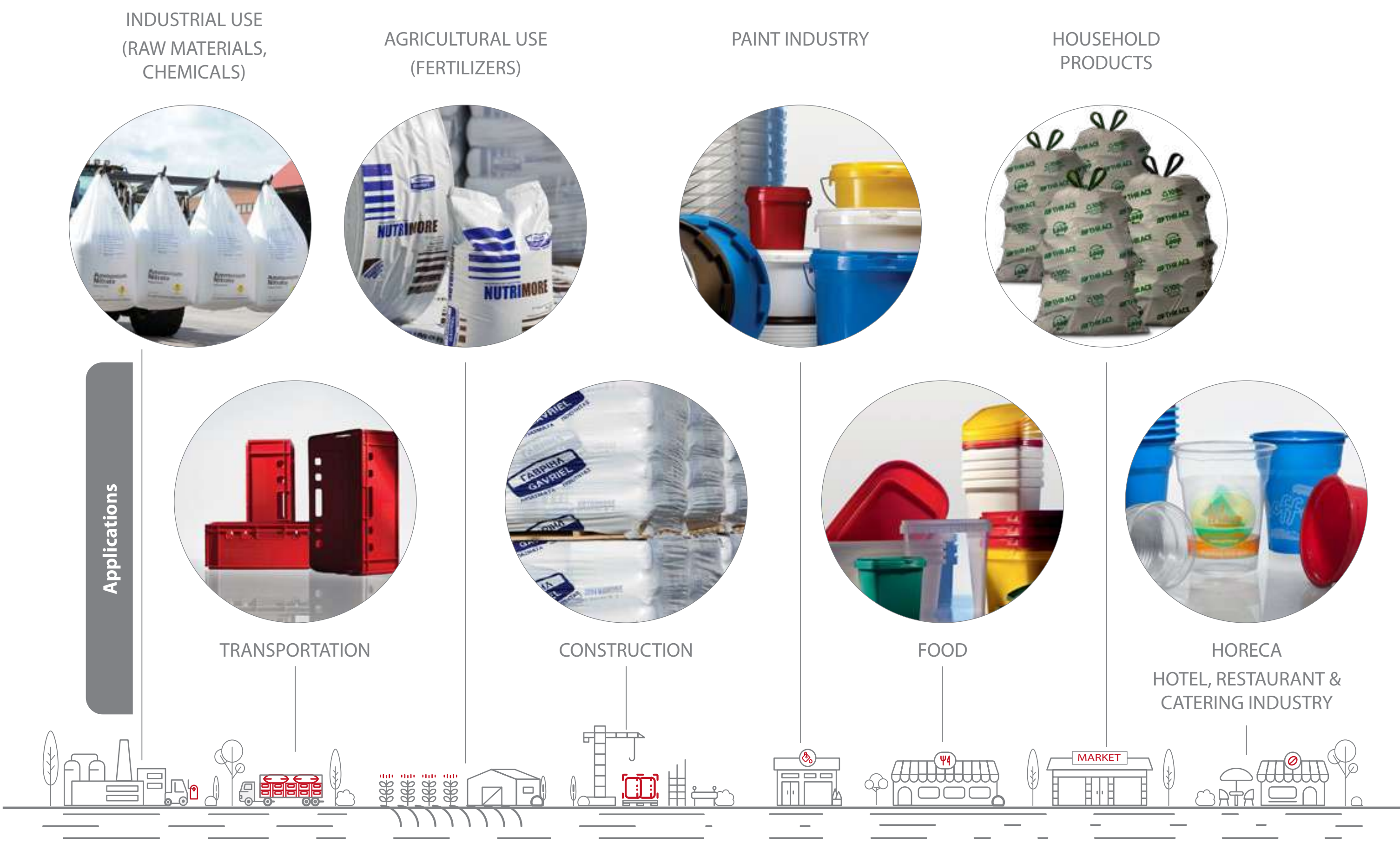
[GRI: 2-6, ATHEX ESG: A-G1]

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

Product Families

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

Applications



THRACE PACK — GREECE & SERBIA

THRACE POLYFILMS — GREECE

THRACE IPOMA — BULGARIA

THRACE greiner packaging — ROMANIA

THRACE SYNTHETIC — IRELAND

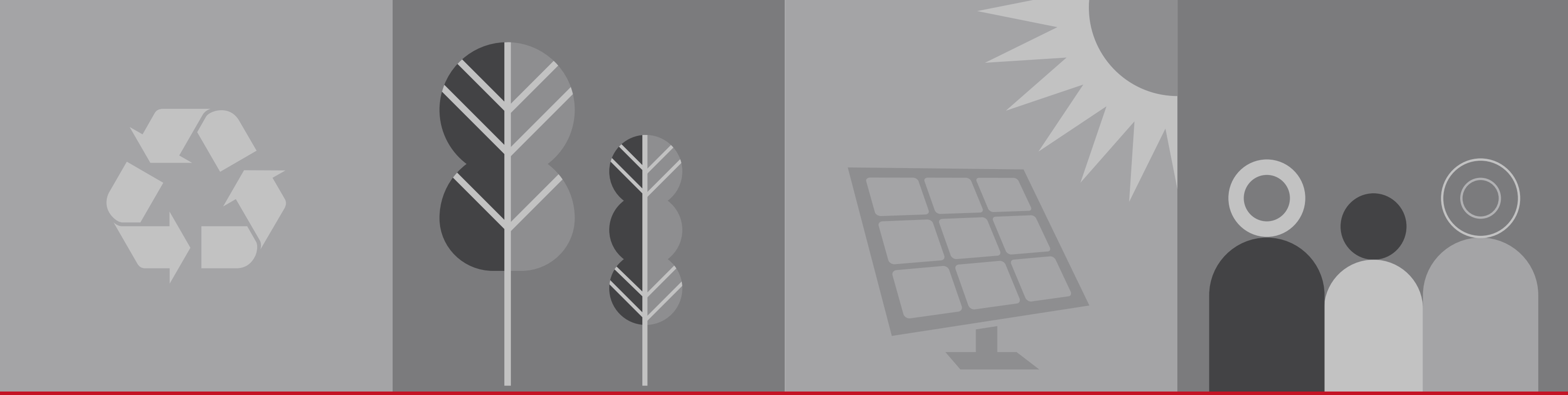
Business sectors of activity

AGRICULTURAL SECTOR

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

- The largest hydroponic greenhouses in South East Europe.
- The only greenhouses in the world heated exclusively by geothermal energy.
- Greek vegetables with almost zero CO_2 footprint.
- Cultivation based on the highest standards.

Thrace Greenhouses
FRESH HYDROPONIC VEGETABLES



THRACE GROUP

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THRACE PLASTICS CO S.A.

ANNUAL FINANCIAL REPORT

1st January - 31st December 2023

www.thracegroup.gr

THRACE GROUP

Information regarding the preparation of the Annual Financial Report for the period from January 1st to December 31st 2023

The present Report was approved unanimously by the Board of Directors of "THRACE PLASTICS CO SA". The present Financial Report, which refers to the period from 1.1.2023 to 31.12.2023, was prepared in accordance with the provisions of article 4 of L.3556/2007 (Gov. Gaz. 91A'/30-04-2017), of Law 4548/2018 and the relevant decisions issued by the Board of Directors of the Hellenic Capital Market Commission under Reg. No. 8/754/14-4-2016 and 1/434/03-07-2007 as well as with the protocol no. 62784/06-06-2017 Circular of the Division of Enterprises and GEMI of the Ministry of Finance, Development and Tourism. The present Report was approved unanimously by the Board of Directors of "THRACE PLASTICS CO S.A." ("Company") on April 22nd, 2024, has been posted on the Company's website www.thracegroup.gr where such will remain available to investors for a period of at least (10) ten years from the publication date and includes:

CONTENTS

I. STATEMENTS BY REPRESENTATIVES OF THE BOARD OF DIRECTORS

(according to article 4 par. 2 of L 3556/2007)

We, the representatives of the Board of Directors, hereby state and confirm that to our knowledge:

(a) The Annual Financial Statements (Stand-alone and Consolidated) of the Company, which concern the period from January 1st 2023 to December 31st 2023, were prepared in accordance with the accounting standards in effect, accurately present the Assets and Liabilities, Equity and Financial Results of the Company, as well as those of the consolidated companies and considered aggregately as a whole, and

(b) The Annual Report by the Company's Board of Directors accurately presents the significant events of the year 2023 and their effect on the annual financial statements, the material transactions between the Company and its related parties, the developments, performance and position of the Company, as well as of the consolidated companies and considered aggregately as a whole, including the description of the basic risks and uncertainties they are facing.

Xanthi, 22 April 2024

THE UNDERSIGNED:

The Chairman of the Board of Directors	The Chief Executive Officer & Executive Member of the Board of Directors	The Non-Executive Member of the Board of Directors
Konstantinos St. Chalioris	**Dimitris P. Malamos**	**Vasileios S. Zairopoulos**

II. ANNUAL REPORT BY THE BOARD OF DIRECTORS OF THRACE PLASTICS CO S.A. ON THE FINANCIAL STATEMENTS OF THE YEAR FROM 01.01.2023 TO 31.12.2023

INTRODUCTION

The present Annual Report by the Board of Directors (hereinafter called as "Report") refers to the fiscal year 2023 (01.01.2023 – 31.12.2023). The Report was prepared in accordance with the relevant provisions of Law 4548/2018 (GOV. GAZ. 104A΄/13.06.2018) as currently in force and of Law 3556/2007 as in effect following its amendment from Law 4374/2016 and the relevant executive decisions issued by the Board of Directors of the Hellenic Capital Market Commission, and especially the decisions with number 1/434/3.7.2007 and 8/754/14.4.2016, as the latter is valid after its amendment by the decision with number 12A / 889 / 31.08.2020 of the Board of Directors of Hellenic Capital Market Commission.

The Report includes the total required by law information (financial and non-financial information) with a concise as well as comprehensive, objective and adequate manner and with the principle of providing the complete and substantial information with regards to the issues included in such.

Given the fact that the Company prepares consolidated and non-consolidated (stand-alone) financial statements, the present Report constitutes a single report referring mainly to the consolidated financial data of the Company and its subsidiaries or affiliates. Any reference to non-consolidated financial data takes place in certain areas which have been deemed as necessary by the Board of Directors of the Company for the better understanding of the contents of the report and towards providing investors with the most complete information.

It is noted that the present Report includes, along with the 2023 financial statements, the required by law data and statements in the Annual Financial Report, which concern the financial year ended on 31 December 2023.

The sections of the present Report and the contents of such are in particularly as follows:

SECTION 1: Significant events that took place during the financial year 2023

Below, the most significant events that took place during the fiscal year 2023 are presented:

Macroeconomic Environment, Performance and Prospects of the Group, Climate Issues and Expected Credit Losses

2023 was another year affected by a series of unfavorable macroeconomic and geopolitical factors. On the one hand, hostilities in the Middle East created and keep creating, further uncertainty in the European as well as the global economy, combined with the ongoing war conflict between Russia and Ukraine. On the other hand, the weak performance of Europe's major economies created conditions of stagnation and uncertainty in the market. At the same time, the inflationary pressures continued to exist, however at clearly lower levels, while interest rates have remained at higher levels.

In contrast to the above backdrop, the energy costs moved to lower levels compared to the levels of 2022, while costs of raw and auxiliary materials moved also to lower levels in comparison with the previous year.

With regard to the Group's areas of activity, 2023 was a year of low demand in the Technical Fabrics sector mainly affected by the weak demand in the construction and agricultural sector, while a stronger demand was seen in the Packaging sector.

I. Group's performance during the fourth quarter of 2023

In particular, during the fourth quarter of 2023, the following were observed:

- Reduced demand for products in the construction sector.
- Steady demand for products related to the infrastructure sector and to the large-scale construction projects.
- Reduced demand for the products of the agricultural sector.
- Increased demand for products related to the packaging sector (food and paints).
- Almost zero demand for products related to COVID-19.
- Stabilization of the cost of raw materials at lower levels, compared to the previous year.
- Further pressures for decreases on sales prices, in all product categories as a result of reduced raw material prices and due to lower demand.
- Steady energy costs during the current year, reduced however compared to 2022.
- Steady transport costs with satisfactory availability of transportation means.
- Limited reduction in the cost of raw materials and packaging materials.
- Constantly increased interest rates.

From a financial perspective, Turnover amounted to €345.4 million in 2023, settling lower due to the significant drop in average sale prices, versus the previous year's sales of €394.4 million. It is noted that in the first months of 2022, the prices of raw materials had fluctuated at historically high levels and therefore sale prices also moved upward during the same year. The volumes sold in 2023 stayed almost the same with the ones in 2022 despite the lower demand in key sectors of the economy (construction, agricultural sector) primarily in the European Union, United Kingdom and USA.

For the year 2023, Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) amounted to €44.0 million. In the year 2022, Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) had reached €48.2 million, however following the deduction of the one-off profits from the COVID-19 products of approximately €5.3 million, in comparable terms, the Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) of year 2022 had settled at €42.9 million. As a result, on comparable basis, the operating profitability (EBITDA) posted an increase of 2.4% in 2023 versus 2022.

In view of the difficult conditions prevailing in the markets and economies in general, particularly the ones of the Central Europe and the United Kingdom, the improvement of Group's profitability performance in 2023 versus 2022 clearly demonstrates the ability of the Group to achieve stable and recurring profitability. At the same time, the retention of volumes sold is also a strong indication of the Group's potential to further enhance its financial performance in the future.

Regarding the liquidity levels of the Group and the trading cycle of subsidiaries, there was no negative effect due to the difficult conditions observed during the year under consideration. The Group's Net Debt amounted to €29.6 million, however it should be noted that the calculation of Net Debt does not include time deposits of €13.3 million. Therefore in the event that this amount had been included, the Group's net debt would have amounted to €16.3 million. The low level of Net Debt demonstrates the Group's strong financial position as well as the quality of its customer portfolio, its ability to make investments while keeping its Net Debt relatively low, and also its ability to distribute significantly higher dividends compared to pre-pandemic levels.

At the same time, the implementation of the Group's investment plan, amounting to €30 million on a cash basis, was implemented smoothly via investments made mainly in the Group's production facilities in Greece and abroad with regard to both business segments.

II. Prospects of the Group

In the first months of year 2024, both markets and economies have been characterized by trends and conditions which are relatively comparable to the ones of the year 2023. Inflation remains relatively stable, whereas prices of raw and auxiliary materials have followed an upward trend which is expected to continue at least for the first half of 2024. Finally, the recent shipping crisis in Red Sea is causing difficulties in maritime trade but also creates upward pressures in transport costs, while the new tension in the Middle East makes the geopolitical conditions even more difficult and increases the uncertainty about the economies.

For the first quarter of 2024, the Management estimates that Group's operating profitability (EBITDA), in absolute terms, will edge 5%-10% higher than in the first quarter of the previous year. This is due to specific actions taken on the Group level and specifically by the sales teams as well as the subsidiaries' management teams, but is also due to profits generated from new product categories and partnerships. Furthermore, there is stable demand in the sectors of infrastructure and packaging, an increase in demand in the agricultural sector, whereas there is still weak demand in the construction sector.

With regard to the Group's annual profitability, the Management estimates that, despite the high uncertainty about the course of the global economy and of Europe in particular, the Group's EBITDA profitability for the year 2024 is expected to fluctuate at higher levels than the ones of 2023. However, even if the Company does not revise its initial annual target, the recent crisis in the Middle East creates new conditions of uncertainty, the effects of which are impossible to determine at the given time, therefore any estimate of annual profitability is highly uncertain, while the Management of the Group monitors the market developments so to be able to implement the necessary actions, in order not to deviate from its plan.

III. Climate issues

The Group recognizes the risks and impacts that may arise in its business activity due to the climate crisis and the energy transition, which may affect its production process and activities, while at the same time has identified great opportunities that are emerging through the adoption of the principles of circular economy, the use of recycled raw material and the investment in renewable energy sources.

In order to mitigate the risks arising from climate change, but also to take advantage of the opportunities that arise in order to achieve positive financial results for itself and the environment in which it operates, the Group is constantly adjusting its business model, in order to constantly reduce its environmental footprint. It achieves this through (a) recording direct and indirect greenhouse gas emissions along with the constant improvement of the respective indicators, (b) reducing energy consumption in production processes, (c) self-production and use of energy from renewable sources (solar, geothermal and hydroelectric), (d) reducing the use of natural resources through the use of recycled raw material and (e) proper waste management.

In addition, the Group focuses on the development of innovative and sustainable products and services, applying the principles of the circular economy. With the aim of further strengthening the achievement of this goal, the Group has created the circular economy platform IN THE LOOP, which networks companies, brands, public entities and consumers, facilitates the continuous reduction of environmental footprint throughout the value chain, and also designs specialized closed / controlled cycle systems of upgraded recycling purposes.

Therefore, the Company has established and communicated relevant principles and policies, while it has formulated a strategic plan for sustainable development with specific actions, which are being implemented with measurable positive results thus ensuring the Group's business continuity. At the same time, through a specialized team, appropriate actions are already being taken in order to implement the requirements of the new CSRD (Corporate Sustainability Reporting Directive). The Group's excellent performance is also reflected in the respective evaluations performed from recognized international organizations. The Group has ranked in the highest "Platinum" scale in "Forbes

ESG Transparency Index", which reflects the level of transparency and has been also awarded the "B" rating from the international organization CDP (Carbon Disclosure Project), exceeding the global average for the manner by which it manages the impact of its activities on climate change.

Further details are set out in the Non-Financial Information Report (Section 12) of the Annual Financial Report.

IV. Expected Credit Losses

There are no expected credit losses as a result of the current conditions and circumstances. In any case, according to the established policy, a big part of the companies' sales insured, while additional measures have been taken to ensure the Group carries out transactions with reliable customers (credit risk assessment, credit scoring, advances, etc.). More information on credit risk can be found in note 3.31 of financial statements.

Direct Impact from Geopolitical Conditions

The new middle east crisis has created geopolitical instability anew and a broader uncertainty about the potential macro-economic consequences that will likely emerge, especially in the event of a long-lasting conflict. It is noted that the Group does not directly carry out any significant business activities in the involved parties, i.e. in the areas directly affected by the conflict. At the same time, the recent conflicts of Israil and Iran create additional instability and uncertainty in the wider region and globally. More specifically, the overall exposure to the markets of Israel, Iran and Palestine is limited, as based on the volume data of 2023, sales in above countries amounted to 0.26% of the Group's total turnover.

The war outbreak after the Russian military invasion of Ukraine continues and creates geopolitical instability with adverse macroeconomic consequences which the company faces on a day-to-day basis and are mainly related to increase in a series of raw materials and products. The above conditions create an environment of great uncertainty affecting the level of demand especially in Europe. The Group does not have significant direct business activities in Ukraine and in Russia, i.e. in the areas directly affected by the war. Furthermore, the overall exposure to Ukraine and Russia is minimal. Based on the financial results of 2023, sales in these two countries stood at 0.55% of the Group's total turnover (for 2022, corresponding sales had stood at 0.2% of total Group sales).

Therefore, given the non-existence of any significant business activity in the specific region when it comes to customer sales, the Group does not expect to have any immediate and significant impact on its financial performance. However, the negative and long-lasting evolution of the conflict along with the wider and unfavorable macro-economic repercussions might potentially have a negative effect on the activities of all businesses and companies activating in Europe and therefore on the business activities of the Group. The Group's Management closely monitors the relevant developments and if needed will undertake a series of actions to weather any negative consequences, should they arise.

Interim Dividend fiscal year 2022

The interim dividend for fiscal year 2022 was paid in fiscal year 2023. With more details, the Board of Directors of the Company, during its meeting of November 22nd, 2022 approved the distribution (payment) of interim dividend for fiscal year 2022 to the shareholders of the Company, of a total amount of 3,000,000.00 Euros (gross amount), corresponding to 0.0685848289 Euros per share (gross amount), which with the increase corresponding to the 751,396 treasury shares, which were held by the Company and in accordance with the law are excluded from the interim dividend distribution, amounted to 0.0697835797 Euros per share.

The above amount of the interim dividend is subject to 5% withholding tax, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force after its amendment by Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

Therefore, the final payable amount of the interim dividend for the fiscal year 2022 was 0.0662944007 Euro per share.

The cut-off (ex-dividend) date of the interim dividend, as it had been already announced, was Monday, January 30, 2023.

Beneficiaries of the interim dividend for fiscal year 2022 were the shareholders registered in the Company's records in the Dematerialized Securities System on Tuesday, January 31, 2023 (Record Date).

The payment (distribution) of the interim dividend commenced on Friday, February 3, 2023, and was paid through the paying Bank "PIRAEUS BANK S.A.", according to the procedure that had been described in the relevant Company's announcement dated December 8th, 2022.

Announcement of Regulated Information in accordance with Law 3556/2007

The Company following the relevant notification, Company received from below shareholders from March 10th, 2023, announced the following amendments / developments on March 9, 2023:

1. Mr. Konstantinos Chalioris, shareholder and Chairman of the Board of Directors of the Company, transferred from his individual Investment Account, to two "Joint Investor Shares" (KEM), the first one jointly created with his son Alexandros Chalioris and the second one jointly created with his son Stavros Chalioris (himself being the first beneficiary in both "Joint Investor Shares"), a total of 18,000,983 common registered shares with voting rights, i.e. a percentage of 41.153% of a total of 43,741,452 common registered shares with voting rights of the Company.

   However, following the above, there was absolutely no change in the number and percentage of shares and voting rights controlled by Mr. Konstantinos Chalioris, who holds a total of 18,936,558 common registered shares with voting rights of the Company (and the same number of voting rights) a percentage of 43.292%. More specifically, he holds 18,000,983 common registered shares through the aforementioned "Joint Investor Share" and 935,575 common registered shares with voting rights (percentage 2.139%) through his Personal Investment Account.

2. Mr. Stavros Chalioris, son of Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,491 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage 0.484%) in his Personal Investment Account and,
3. Mr. Alexandros Chalioris, son of Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,492 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage of 0.484%) in his Personal Investment Account.

Replacement of a resigning member of the Audit Committee – Formation of the Audit Committee into a Body

The Company announced that as a result of the resignation of the member of the Company's Audit Committee, Mr. Konstantinos Gianniris (third person - Non-Member of the Board of Directors), which is effective from 28.4.2023, the Board of Directors of the Company, by its Decision on 2.5.2023, appointed Mrs. Sofia Manesi (third person - Non-Member of the Board of Directors) as a temporary replacement of the above resigned member in the Audit Committee of the Company until 24 May 2023, when the Annual General Meeting of the Company's shareholders was convened.

The Board of Directors, following a relevant recommendation of the Remuneration and Nominations Committee, found in the person of Mrs. Sofia Manesi sufficient knowledge of the Company's subject matter, a guarantee of ethics and reputation, reliability and solvency, and that she has sufficient time to perform her duties as a member of the Audit Committee as well as experience and knowledge in auditing and accounting matters. The Board of Directors appointed Mrs. Sofia Manesi to replace the resigned member after having considered the Audit Committee's Rules of Procedure and after finding that she fulfils the requirements of independence of Article 9 of Law 4706/2020 and therefore has no dependency relationship with the Company or with persons connected to it, nor is she in any potential or actual situation that leads to a conflict of interest with the Company.

The Audit Committee decided on 2 May 2023 to elect Mr. Georgios Samothrakis, Independent Non-Executive Member of the Board of Directors of the Company, as Chairman of the Audit Committee, in accordance with the provisions of article 44 par. 1 case e) of Law 4449/2017, as in force.

Following the above, the Audit Committee of the Company is constituted as follows:

- Georgios Samothrakis, Independent Non-Executive Member of the Board of Directors of the Company, as Chairman of the Audit Committee
- Konstantinos Kotsilinis, Non-Member of the Board of Directors, - third person, member of the Audit Committee
- Sofia Manesi, Non-Member of the Board of Directors, - third person, member of the Audit Committee, temporary Member of the Audit Committee until the Annual General Meeting of the Company's shareholders to be held on 24.5.2023, in accordance

with article 44 par. 1 case f) of Law 4449/2017.

Finally, it was noted that all members of the Audit Committee meet the requirements and independence criteria under the current regulatory framework (article 44 par. 1 of Law 4449/2017 as in force and article 9 par. 1 and 2 of Law 4706/2020).

Annual Ordinary General Meeting of the Company's Shareholders

The Annual Ordinary General Meeting of the Company's shareholders, which took place on May 24, 2023 remotely in real time via videoconference, approved the following among others:

A) the shareholders approved unanimously the allocation (distribution) of the earnings for the fiscal year 2022 (01.01.2022-31.12.2022), and specifically they approved the distribution (payment) of total dividend amounting to 11.300.000,00 Euro (gross amount) to the shareholders of the Company from the profits of the fiscal year ended December 31, 2022, but also from profits of previous years.

Given that the Company, pursuant to the relevant decision of its Board of Directors dated 22.11.2022, has already made the allocation (distribution) to the shareholders of an interim dividend for the fiscal year 2022 of a total amount of 3,000,000.00 Euros (gross amount), i.e. 0.0697835797 Euros per share (gross amount increased by the amount corresponding to the treasury shares that the Company held at the cut-off date of interim dividend), the Annual Ordinary General Meeting of shareholders approved unanimously the distribution of the remaining amount of the dividend, and in particular of the amount of 8,300,000.00 Euros (gross amount), i.e. 0.1897513599 Euros per share (gross amount), which amount will be increased by the amount corresponding to the treasury shares that the Company will hold at the dividend cut-off date and which (treasury shares) are excluded from the distribution, according to the provisions of article 50 of Law 4548/2018, as in force.

The above final (gross) amount of the dividend is subject to 5% tax withholding, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force.

B) the shareholders voted by majority positively the Remuneration Report of the fiscal year 2022, which was prepared in accordance with the provisions of article 112 of L. 4548/2018, containing a comprehensive overview of the total remuneration of the members of the Board of Directors (executive and non-executive), and explaining how the Remuneration Policy of the Company was implemented for the immediately preceding fiscal year.

C) the shareholders approved by majority the amendment of the article 15 of the Company's Articles of Association referring to the compensation (remuneration) of the members of the Board of Directors.

D) the shareholders approved by majority the final decision on the appointment of a new member of the Company's Audit Committee, in accordance with the provisions of article 44, par. 1 of Law 4449/2017, as applicable, Mrs.

Sofia Manesi, who is also a third person and non-member of the Board of Directors, in replacement of a resigned member-third person who is not a member of the Board of Directors Mr. Konstantinos Gianniris. The new member fulfil all the conditions of independence of Law 4706/2020, as in force and the conditions of article 44 of Law 4449/2017, as in force.

The decisions of the General Meeting of Shareholders are posted on the Company's website at the link *https://www.thracegroup.com/gr/en/general-meetings/*

Announcement of ex- dividend date / Payment of remaining dividend for the Year 2022

The Company announced, pursuant to the article 4.1.3.4 of the Athens Exchange Rulebook, that the Annual Ordinary General Meeting of Shareholders, that took place on May 24th 2023, approved unanimously the distribution (payment) of dividend to Company's Shareholders, from the profits of the fiscal year 2022 (01.01.2022-31.12.2022) and from prior years' profits, and in particular, approved the payment of the total amount of 11.300.000 Euro (gross amount), i.e. 0.2583361887 Euros per share (gross amount).

It is noted that the Company had already made the allocation (distribution) to the shareholders of an interim dividend for the fiscal year 2022, on February 3th, 2023, of a total amount of 3,000,000 Euros (gross amount), i.e. 0.0685848289 Euros per share (gross amount), which with the corresponding increase of the 751,396 treasury shares, which were held by the Company and were excluded by law from the interim dividend distribution, amounted to 0.0697835797 Euros per share (gross amount).

After that, the remaining amount of the dividend was 8,300,000 Euros (gross amount), from the profits of the fiscal year 2022 (01.01.2022-31.12.2022), i.e. 0.1897513599 Euros per share (gross amount), which after the increase corresponding to 751,396 treasury (own) shares, which were held by the Company and were excluded from the dividend payment, amounted to 0.1930679039 Euro per share (gross amount).

The above amount of the dividend was subject to 5% tax withholding, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force after its amendment of par. 24 of Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

Therefore, the final payable amount of dividend settled at 0.1834145087 Euro per share (net amount). The cut-off (ex-dividend) date of the dividend was set for Wednesday, 31st May 2023.

Beneficiaries of the remaining dividend for fiscal year 2022 were shareholders registered in the Company's records in the Dematerialized Securities System on Thursday, 1st June 2023 (Record Date).

The distribution (payment) of the above remaining dividend commenced on Wednesday, 7th June 2023 and was paid through the paying Bank "PIRAEUS BANK S.A."

Re-constitution of the Audit Committee into Body - Appointment of New Member

The Company notified the investor community, in accordance with the provisions of article 17 paragraph 1 of Regulation (EU) under no. 596/2014 of the European Parliament and of the Council of April 16, 2014, that the Annual Ordinary General Meeting of the Company's Shareholders of May 24, 2023 approved by majority in accordance with the provisions of article 44 of Law 4449/2017, as applicable after the amendment by the article 74 of Law 4706/2020, the election-appointment of a new member of the Audit Committee (a third person, not a member of the Board of Directors) namely Ms. Sofia Manesi superseding a resigned member (a third person also not member of the Board of Directors) and namely Mr. Konstantinos Gianniris.

It should be noted that the Audit Committee under its new composition:

(a) constitutes an Independent Joint Committee;

(b) consists of three (3) members in total and in particular of one (1) Independent Non-Executive Member of the Board of Directors and two (2) third persons - Non-Members of the Board, independent of the Company. All persons fulfil the independence criteria of article 9, paragraph 1 and 2 of Law 4706/2020, as applicable, and

(c) the term of the Committee coincides with the term of the Board of Directors, i.e. it will be five years, ending on February 11, 2026, extending until the end of the period within which the next Ordinary General Meeting of Shareholders must be convened and until the relevant decision is taken. In no case, however, may the term of Committee exceed six years.

In particular, following its aforementioned decision, the composition of the Company's Audit Committee is as follows:

1) Georgios Samothrakis of Panagiotis, independent non-executive member of the Board of Directors,

2) Konstantinos Kotsilinis of Eleftherios, third person - non-member of the Board of Directors.

3) Sofia Manesi of Nikolaos, third person – non-member of the Board of Directors,

while at the same time the following were established and reconfirmed for each of the above members of the Committee:

(a) the fulfilment of the individual and collective suitability criteria, in accordance with the provisions of article 3 of Law 4706/2020 and the Circular under number 60/18.09.2020 of the Hellenic Capital Market Commission, as well as the provisions of the applicable and approved Suitability Policy of company,

(b) the fulfilment -by all members of the Audit Committee, of the conditions of independence in accordance with the provisions of article 9, paragraph 1 and 2 of Law 4706/2020, as applicable, namely that:

(i) the above members did not hold directly or indirectly a percentage of voting rights greater than 0.5% of the Company's share capital, and

(ii) the above members were not associated with any financial, business, family or other dependent relationships, which may influence their decisions as well as their independent and objective judgment;

(c) the non-existence of obstacles and conditions that are being described in provisions of article 3, paragraph 4 of Law 4706/2020, as applicable, i.e. the non-issuance within one (1) year, before or after the election of the member respectively, of a final court decision that acknowledges the member's guiltiness for loss-making transactions with related parties on behalf of a company or a non-listed company as provided by Law 4548/2018,

(d) the absence of obstacles/incompatibilities posed by the provisions of the current legislative framework on corporate governance, including the Greek Corporate Governance Code applied by the Company, the Operating Regulations and the Company's Suitability Policy.

(e) the sufficient knowledge of the sector in which the Company operates, and finally

(f) the persons of the entire Audit Committee possessed sufficient knowledge and experience in auditing and accounting (including knowledge and complete understanding of International Auditing Standards), conditions that were imposed by the provision of article 44, paragraph 1, section g' of Law 4449/2017.

The Members of the Company's Audit Committee during the meeting of May 25, 2023 unanimously elected Mr. Georgios Samothrakis of Panagiotis as Chairman of the Committee, since it was previously established but also verified that the above person:

(a) is independent from the audited entity within the meaning of article 9, paragraph 1 and 2 of Law 4706/2020, as applicable,

(b) is the most suitable for the position of Chairman based on professional training, knowledge and experience.

Following the above, the Audit Committee under its new final composition was reconstituted into a body as follows:

1) Georgios Samothrakis of Panagiotis, independent non-executive member of the Board of Directors, Chairman of the Committee.

2) Konstantinos Kotsilinis of Eleftherios, third person - non-member of the Board of Directors. Member of the Committee.

3) Sofia Manesi of Nikolaos, third person – non-member of the Board of Directors, Member of the Committee.

Commencement of Share Buyback Program

The Company announced in compliance with the Regulation No. 596/2014/EU and the Athens Exchange Rulebook, that the Board of Directors approved the commencement of the implementation of the Company's Shares Buy-back Program, as approved by the Annual General Meeting of the Shareholders dated May 24th, 2023.

It was noted that the approved Shares Buy-back program includes the purchase of Company's shares through the Athens Exchange (ATHEX), in accordance with the provisions of articles 49 & 50 of L.4548/2018, until May 24th,2025, at a maximum number of 4,341,876 common registered shares (including and aggregating the treasury shares already purchased by the Company within the context of the previous Share Buy-back programs), with a purchase price range between fifty cents of Euro (0.50€) (minimum) per share and ten Euro (10 €) (maximum) per share.

Share purchases are carried out in accordance with the current regulatory framework.

Announcement of the Decision to Distribute an Interim Dividend the 2023

The Company informed the investor community, that the Board of Directors of the Company, during its meeting on 25th September 2023, approved the distribution (payment) to the Company's shareholders of an interim dividend from the earnings of the current financial year 2023 amounting in total to 3,000,000 Euros (gross amount), i.e. 0.0685848289 Euro per share of the Company (gross amount).

The final amount per share of the interim dividend, which was paid, was increased by the amount corresponding to the treasury shares held by the Company on the cut-off date of the interim dividend.

The above amount of interim dividend is subject to a withholding tax of 5% in accordance with the provisions of article 40 paragraph 1 and of article 64 paragraph 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013) as applicable after its amendment by Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

The distribution of the interim dividend takes place two (2) months after the registration in G.E.MI. of the relevant announcement regarding the release of the interim financial statements for the period 01.01.2023-30.06.2023 (First half of the current financial year 2023).

Announcement of ex- dividend date / Payment date of interim dividend for the Year 2023

The Company announced to the investor community, pursuant to the article 4.1.3.4 of the Athens Exchange Rulebook, (called as "Regulation" hereafter), as in force, that the Board of Directors of the Company, during its meeting of September 25th, 2023, approved the distribution (payment) of interim dividend for year 2023 to the shareholders of the Company, of a total amount of 3,000,000.00 Euros (gross amount), corresponding to 0.0685848289 Euros per share (gross amount), as already informed the investors' community at September 28th, 2023, with a relevant corporate announcement. (Note 3.25)

The Board of Directors of the Company, during its meeting of October 6th, 2023 set the following dates:

Thursday, November 30th, 2023 was set as the interim dividend cut-off (ex-dividend) date.

Beneficiaries of the interim dividend for fiscal year 2023 are the shareholders registered in the Company's records in the Dematerialized Securities System on Friday, December 1st, 2023 (Record Date).

The payment (distribution) of the interim dividend would commence on Wednesday, December 6th, 2023, and would be paid through the paying Bank "PIRAEUS BANK S.A." as follows:

1. Through the participants in the Dematerialized Securities System (DSS) i.e. Banks and Brokerage/Securities Companies, according to the provi-

sions of the DSS Operation Regulation of the Hellenic Central Securities Depository (ATHEXCSD) and the relevant decisions of ATHEXCSD.

2. Especially in cases of payment of the interim dividend to the legal heirs of deceased entitled shareholders, whose securities are kept in the Special Account of their S.A.T. ID in the DSS under ATHEXCSD custody, the disbursement process will be facilitated, following completion of the inheritance procedural steps, through any branch of "PIRAEUS BANK" network.

It was clarified that according to the current applicable legislation, the right for the collection of the interim dividend amount expires after the completion of a five year period (article 250 of the Civil Code, section 15) from the end of the fiscal year in which this right was created and following such time period the uncollected amounts will irrevocably be reimbursed to the Hellenic State, in accordance with article 1 of legislative decree 1195/1942.

Write-off of Dividend for the Financial Year 2017

THRACE PLASTICS CO S.A. announced to the investor community, that the five-year period for the collection of the dividend for the financial year 2017, expired on December 31st, 2023. Following that date, dividends not collected from entitled parties would be written off, in favor of the Greek State in accordance with the applicable legislation.

Thrace Group's New Investment Plan of a total amount of € 10 million in Packaging Business in Greece

THRACE PLASTICS CO S.A. announced the immediate implementation of a new extended unplanned investment program of €10 million, for the Packaging Business Unit, which will take place in Greece, through its subsidiary Thrace Plastics Pack SA.

The new investment program is oriented towards the Sustainable Development, focusing on the further increase of the production capacity in the specific subsidiary of the Group, as well as in the Packaging Business Unit in general, targeting to support the Greek clientele in a more efficient, direct and complete manner, with an even more complete product portfolio, as well as to further develop the Group's export activities and subsequently enhance its business extroversion.

The specific categories of the new investment plan with immediate implementation by the specific subsidiary, are summarized as follows:

- Investment in Injection Molding Production, which is the main technology for production of plastic containers, targeting the food sector, the hotels / restaurants industries and the paints industry,
- Investment in Thermoforming technology, for the production of small plastic containers, targeting the food sector and in specific the dairy market,
- Investment in Paper Packaging Production Machinery, to produce paper packaging products, supplementary to the existing product portfolio for the catering sector.

The new investment plan, which will reach an amount of €10 million approximately, is in accordance with the sustainable development practices and will contribute to an environmental footprint reduction, while the new machines are expected to be fully operational within the first half of 2024. Based on this time plan, it is estimated that the new investments will increase the production capacity of the subsidiary by 4,000 tons approximately, on an annual basis. The new investment plan will be financed both with own funds and external financing.

Announcement of the exact payable amount of the interim dividend for the fiscal year 2023

THRACE PLASTICS CO S.A. with reference to its earlier announcement dated October 10th, 2023, announced to the investor community, pursuant to the article 4.1.3.4 of the Athens Exchange Rulebook, that the Board of Directors of the Company, during its meeting of September 25th, 2023 approved the distribution (payment) of interim dividend for fiscal year 2023 to the shareholders of the Company, of a total amount of 3,000,000.00 Euros (gross amount), corresponding to 0.0685848289 Euros per share (gross amount), which with the increase corresponding to the 798,549 treasury shares, which were held by the Company and in accordance with the law are excluded from the interim dividend distribution, would amount to 0.0698602048 Euros per share.

The above amount of the interim dividend is subject to 5% withholding tax, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force after its amendment by Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

Therefore, the final payable amount of the interim dividend for the fiscal year 2023 were 0,0663671946 Euro per share.

Issuance of Tax Certificates for the Fiscal Year 2022

THRACE PLASTICS CO. S.A. in compliance with the provisions of paragraph 4.1.3.1 section 12 of the Athens Exchange Rulebook and article 17 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014, announced to the investors that following the completion of the tax audits for the financial year 2022 (fiscal year 2022), which were carried out by the Chartered Auditor-Accountants of the Group, in accordance with the provisions of article 65A law 4174/2013, both for the Company and its subsidiaries 'Thrace Nonwovens & Geosynthetics S.A.', 'Thrace Polyfilms S.A.', 'Thrace Plastics Pack S.A.', 'Thrace Eurobent S.A.' and 'Thrace Greenhouses S.A.', the relevant tax certificates were issued with an "unqualified opinion".

SECTION 2: Main Risks and Uncertainties

Financial Risk Management

The financial assets used by the Group, mainly consist of bank deposits, bank overdrafts, receivable accounts, payable accounts and loans.

The Group's activities, in general, create several financial risks. Such risks include market risk (foreign exchange risk and risk from changes of raw materials prices), credit risk, liquidity risk and interest rate risk.

Risk from fluctuation of prices of raw materials

The Group is exposed to fluctuations in the price of polypropylene (represents 45% approximately of the cost of sales), which are mainly faced by a similar change in the selling price of the final product. The possibility that the increase in the price of polypropylene cannot be fully passed on to the selling price, causes unavoidably the compression of margins. For this reason, the Company accordingly adjusts, to the extent it is feasible, its inventory policy as well as its commercial policy in general. Hence, in any case, the particular risk is deemed as relatively controlled.

Credit Risk

The credit risk to which the Group and the Company are exposed is the likelihood that a counterparty will cause financial loss to the Group and the Company as a result of the breach of its contractual liabilities.

The maximum credit risk to which the Group and the Company are exposed at the date of preparation of the financial statements is the book value of their financial assets. In order to address credit risk, the Group consistently applies a clear credit policy, which is monitored and evaluated on an ongoing basis so that the credit granted does not exceed the credit limit per customer. Client sales insurance policies are also concluded per customer and no tangible guarantees on the assets of clients are required.

In order to monitor credit risk, customers are grouped according to the category they belong to, their credit risk characteristics, the maturity of their receivables and any previous receivables that they have caused, taking into account future factors as well as the economic environment.

Impairment

The Group and the Company, in the financial assets that are subject to the model of expected credit losses, include receivables from customers and other financial assets.

The Group and the Company recognize provisions for impairment with regard to the expected credit losses of all financial assets. The expected credit losses are based on the difference between the contractual cash flows and the entire cash flows which the Group (or the Company) anticipates to receive. The difference is discounted by using an estimate concerning the initial effective interest rate of the financial asset. For the trade receivables, the Group and the Company applied the simplified approach of the accounting standard and calculated the expected credit losses based on the expected credit losses for the entire lifetime of these items. Regarding the remaining financial assets, the expected credit losses are being calculated according to the losses of the next 12 months. The expected credit losses of the following 12 months is part of the anticipated credit losses for the entire life of the financial assets, which emanates from the probability of a default in the payment of the contractual obligations within the next 12-month period starting from the reporting date. In case of a significant increase in credit risk since the initial recognition, the provision for impairment will be based on the expected credit losses of the entire life of the asset.

At the date of the preparation of the financial statements, impairment of receivables from customers and other financial assets was made on the basis of the above.

The following table presents an analysis of the maturity of Trade Receivables' balances at 31.12.2023.

Maturity of Trade Receivables' balances at 31.12.2023	Group
01 – 30 days	18,385
31 – 90 days	35,046
91 – 180 days	8,876
180 days and over	7,324
Subtotal	**69,631**
Provisions for doubtful receivables	(7,452)
Total	**62,179**

The analysis of provision in below table:

Analysis of provisions	Expected Credit Losses	Expected Credit Losses %
01 – 30 days	3	0.02 %
31 – 90 days	78	0.22 %
91 – 180 days	377	4.25 %
180 days and over	6,994	95.51 %
Total	**7,452**	**100.00 %**

The above amounts are expressed in terms of due days in the table below:

Analysis of not past due/overdue	Group
Trade receivables at 31.12.2023	Group
Receivables current	46,545
Overdue receivables 1 – 30 days	11,856
Overdue receivables 31 – 90 days	3,765
Overdue receivables above 91 days	**7,465**
Subtotal	69,631
Provisions for doubtful receivables	**(7,452)**
Total	**62,179**

With regard to uninsured receivables overdue more than 90 days, which the Group has classified as doubtful, relevant provisions have been made which are deemed as sufficient.

Correspondingly, the amounts of maturity and past due for the financial year 2022 are presented in the following tables:

Amounts in thousand Euro, unless stated otherwise

Maturity of Trade Receivables' balances at 31.12.2022	Group
01 – 30 days	19,708
31 – 90 days	37,429
91 – 180 days	8,196
180 days and over	7,126
Subtotal	**72,459**
Provisions for doubtful receivables	(7,690)
Total	**64,769**

Analysis of not past due/overdue	Group
Trade receivables at 31.12.2022	Group
Receivables current	52,008
Overdue receivables 1 – 30 days	9,838
Overdue receivables 31 – 90 days	3,015
Overdue receivables above 91 days	**7,598**
Subtotal	72,459
Provisions for doubtful receivables	**(7,690)**
Total	**64,769**

Liquidity Risk

Liquidity risk monitoring focuses on the management of cash inflows and outflows on a consistent basis, so that the Group has the ability to meet its cash liabilities and retain the cash reserves required for its operations. Liquidity is managed by maintaining cash and approved bank credit lines. At the date of preparation of the financial statements, unused approved bank credits were available to the Group, which are considered sufficient to handle any possible shortage of cash in the future.

Short-term bank liabilities are renewed at maturity, as they are part of the approved bank credit lines.

The following table presents the liabilities – disbursements according to their maturity dates.

Group 31.12.2023	Up to 1 month	1-6 months	6-12 months	1-5 Years	Over 5 years	Total
Suppliers	17,088	21,284	90	-	-	**38,462**
Other short-term liabilities	11,611	9,695	72	-	-	**21,378**
Short-term debt	4,881	16,776	4,898	-	-	**26,555**
Liabilities from leasing (short-term portion)	85	444	611		-	**1,140**
Long-term debt	-	-	-	26,713	1,077	**27,790**
Liabilities from leasing (long-term portion)	-	-	-	1,885	-	**1,885**
Other long-term liabilities	-	-	-	518	-	**518**
Total 31.12.2023	**33,665**	**48,199**	**5,671**	**29,116**	**1,077**	**117,728**

Amounts in thousand Euro, unless stated otherwise

Group 31.12.2022	Up to 1 month	1-6 months	6-12 months	1-5 Years	Over 5 years	Total
Suppliers	21,357	19,051	222	-	-	**40,630**
Other short-term liabilities	11,324	10,367	1,279	-	-	**22,970**
Short-term debt	3,658	8,735	14,596	-	-	**26,989**
Liabilities from leasing (short-term portion)	86	383	498	-	-	**967**
Long-term debt	-	-	-	30,993	648	**31,641**
Liabilities from leasing (long-term portion)	-	-	-	1,446	24	**1,470**
Other long-term liabilities	-	-	-	174	-	**174**
Total 31.12.2022	**36,425**	**38,536**	**16,595**	**32,613**	**672**	**124,841**

Foreign Exchange Risk

The Group is exposed to foreign exchange risks arising from existing or expected cash flows in foreign currency and investments that have been made in countries outside Greece. The management uses hedge instruments, mainly foreign currency forward contracts, to hedge the risks arising from changes in foreign exchange rates.

Sensitivity analysis of the effect of exchange rate changes is depicted in the table below.

Foreign Currency	2023			2022		
Change of foreign currency against Euro * **Profit before tax**	USD	GBP	Other	USD	GBP	Other
+5%	(155)	(53)	-	(333)	65	(18)
-5%	172	58	-	368	(72)	21
Equity						
+5%	(58)	(438)	(319)	(56)	(881)	(302)
-5%	64	484	352	62	974	334

Note

- *Profits before Taxes are converted at the average exchange rates.*
- *Equity is converted at the exchange rate at the closing date of each fiscal year.*

Amounts in thousand Euro, unless stated otherwise

Interest Rate Risk

The long-term loans of the Group have been granted by Greek and foreign banks and are mainly in Euro. Their repayment time varies, depending on the loan agreement and they are usually linked to Euribor plus spread. The Group's short-term loans have been granted by various banks, with Euribor interest rate plus spread as well as Libor interest rate plus spread.

The Group Management monitors the evolution of the interest rates level and initiate actions, to the extent possible, to retain or decrease the spreads. At the same time, effort is being placed on liquidity management, with a target to maintain a rational debt balance, compared with Group's sales volume, profitability level and its investment plans.

It is estimated that a change in the average annual interest rate by 1% will result in a (charge) / improvement of Earnings before Tax as follows:

Possible interest rate change	Effect on Earnings before Tax Group	
	2023	**2022**
Interest rate increase 1%	**(573)**	(610)
Interest rate decrease 1%	**573**	610

Capital Adequacy Risk

The Group monitors capital adequacy using the Net Debt to Equity ratio and the Net Debt to EBITDA ratio. The Group's objective in relation to capital management is to ensure the ability for its smooth operation in the future, while providing rational returns to shareholders and benefits to other parties, as well as to maintain an adequate capital structure so as to ensure a low cost of capital. For this purpose, it systematically monitors working capital in order to maintain the normal level of external financing.

Capital Adequacy Risk	Group	
	2023	**2022**
Long-term debt	27,790	31,641
Long-term debt from leases	1,885	1,470
Short-term debt	26,555	26,989
Short-term debt from leases	1,140	967
Total Debt	**57,370**	**61,067**
Minus cash & cash equivalents	27,801	39,610
Net Debt**	**29,569**	**21,457**
EBITDA*	**44,017**	**48,243**
NET DEBT / EBITDA	**0.67**	**0.44**
EQUITY	**277,054**	**267,861**
NET DEBT / EQUITY	**0.11**	**0.08**

Amounts in thousand Euro, unless stated otherwise

* *Concerns Total Operations*

** ***An amount of € 13,269 regarding time bank deposits is not included in Cash balance and therefore in Net Debt.These Time Bank Deposits which have been concluded during the current fiscal year, have a duration of more than three months, and have been transferred to other receivables. Therefore, adding the Group's time deposits, the Group's Net Debt amounts to € 16.300 (compared to €21.457 in 2022), while the value of the Net Debt / EBITDA ratio is 0.37 (0.44 for 2022), and the value of the Net Debt/Equity ratio is 0.06 (0.08 for 2022).***

Climate Change Risk

The categorization of climate-related risks includes four main groups of risks, with risks related with water, temperature, wind and solid matirial according to Annex A of the Climate Delegated Act. In this context, an assessment of climate risks and of sensitivity of Group's activities will be carried out. It is pointed out that the Group has and implements an Emergency Response Plan (EPR)at the facilities. At EPR, it is recorded all the preventive measures taken to minimize the risk of fire, of heat, of heavy snowfall / frost, of gale force winds, of storms and of floods. At the same time, repair and maintenance costs are incurred every year for all the facilities related to the prevention and treatment of the effects of climate change, as well as fixed investments that also protect, as far as possible, the Group's facilities from natural disasters. Finally, it should be noted that according to the Group's standard policy, the facilities are insured against all risks, in order to further ensure the smooth operation and recovery of operations in the event of natural disasters.

SECTION 3: Significant Transactions with Related Parties

The most significant transactions between the Company and its related parties, as defined by International Accounting Standard 24, are described below.

It should be noted that the reference to the particular transactions includes the following data:

a) The amount of the most significant transactions for the year 2023

b) Their unpaid balance at the end of the year (31.12.2023)

c) The nature of relation between the related party and the Company, as well as

d) Any information concerning the transactions, which is necessary for the understanding of the Company's financial position, only to the extent that these transactions are material.

Company's Revenues from Related Parties

The following table includes the Company's most material revenue (includes Turnover and other income) streams from Related parties, i.e. from company's subsidiaries:

	Income
Thrace Nonwovens & Geosynthetics Single Person SA	1,564
Don & Low LTD	1,537
Thrace Plastics Pack SA	916
Thrace Polyfilms Single Person SA	364
Thrace Ipoma A.D.	280
Synthetic Holdings LTD	280
Thrace Polybulk AB	255
Thrace Synthetic Packaging LTD	208
Thrace Polybulk AS	207
Thrace Linq Inc	200
Total	**5.811**

Short-term Liabilities of the Company to Related Parties

There is no material short-term liabilities from Related parties for 2023.

Remuneration to the members of the Board of Directors

The remuneration granted to the members of the Company's Board of Directors amounted to € 1,571 in 2023 against € 1,664 in 2022. The remuneration of the members of the Board of Directors for the Group amounted to € 4,436 in 2023 versus € 4,797 in 2022 and relate to the Boards of Directors of 19 companies and to 31 people that participate in these BoDs, including salaries of the executive members of the Boards, other remuneration and benefits of both the executive and the non-executive members.

Bank guarantees and grants in favor of its subsidiaries

Bank guarantees issued by banks on behalf of the Company against third parties (State owned companies, Suppliers, Customers) amount to € 834.

The Company has granted guarantees to banks against long-term loans of its subsidiaries. On 31st December 2023, the outstanding amount for which the Company had provided guarantee settled at € 42,187 and is analyzed as follows:

Guarantees for Subsidiaries	2023
Thrace Nonwovens & Geosynthetics Single Person S.A.	19,262
Thrace Plastics Pack S.A.	18,425
Thrace Polyfilms Single Person SA	4,500
Total	**42,187**

Statutory external auditors fees

During the financial year 2023, the total fees paid to Chartered Auditors-Accountant, for audit and non-audit services, amounted to € 657 for the Group and to € 98 for the Company.

Amounts in thousand Euro, unless stated otherwise

To sum up, there were no changes in transactions between the Company and its related parties that could have had material effect on the financial position and performance of the Company during the financial year 2023.

All transactions described above have taken place on an arms length basis and contain no special or extraordinary features which in opposite case would have made compulsory the further analysis of the above per related party.

SECTION 4: Analytical Information according to Article 4 par. 7 and 8 of Law 3556/2007, as currently in effect

The Company, according to article 4 par. 7 and 8 of L. 3556/2007 is required to include in the present Report, analytical information regarding a series of issues, as follows:

4.1. Structure of Company's share capital

The Company's share capital on 31.12.2023 amounted to twenty eight million eight hundred sixty nine thousand, three hundred fifty eight Euros and thirty two cents (€28,869,358.32) and was divided into forty three million seven hundred forty one thousand, four hundred fifty two (43,741,452) common registered shares, with a nominal value of sixty six cents (€ 0.66) each. All Company shares are common, registered, with voting rights (with the exception of any treasury shares held by the Company), and are listed on the organized Market of the Athens Stock Exchange and specifically in the Main Market under the Chemicals – Specialized Chemicals sector. The structure and the formation of the Company's share capital are presented in detail in article 5 of the Company's Articles of Association. The Company's shares were listed on the Athens Exchange on 26 June 1995 and are being traded on this market up until today, without any interruption. From each share, all rights and obligations stipulated by the law and the Company's Articles of Association emanate. The possession of each share results automatically into the full and with no reservations acceptance of the Company's Articles of Association and the decisions that have been made by the pertinent bodies of the Company in accordance with the law and the Articles of Association. Each share provides for one (1) voting right.

4.2. Limitations to the transfer of Company shares

The transfer of Company shares takes place as stipulated by the Law and there are no limitations regarding such transfers in relation to its Articles of Association or other special agreements or other regulatory provisions.

4.3. Significant direct or indirect shareholdings according to the definition of Law 3556/2007

With regards to significant shareholdings in the share capital and voting rights of the Company, according to the definition of provisions of articles 9 to 11 of L. 3556/2007, the Company's shareholders, with equity stake above 5%, as of 31.12.2023 were the following:

LAST NAME	NAME	SHARES IN "JOINT INVESTMENT SHARES"	SHARES NOT IN "JOINT INVESTMENT SHARES"*	TOTAL SHARES	VOTING RIGHTS
Chalioris	Konstantinos	41.15%	2.13%	43.29%	43.29%
Chaliori	Effimia	-	20.85%	20.85%	20.85%
Chalioris	Alexandros	20.58%	0.48%	21.06%	0.48%
Chalioris	Stavros	20.58%	0.48%	21.06%	0.48%

**For additional information please see the corporate announcement 10/3/2023, which is summarized as follows:*

Mr. Konstantinos Chalioris, shareholder and Chairman of the Board of Directors of the Company, transferred from his individual share, to two "Joint Investor Shares" (KEM), the first one jointly created with his son Alexandros Chalioris and the second one jointly created with his son Stavros Chalioris (himself being the first beneficiary in both "Joint Investor Shares"), a total of 18,000,983 common registered shares with voting rights, i.e. a percentage of 41.153% of a total of 43,741,452 common registered shares with voting rights of the Company.

However, following the above, there was absolutely no change in the number and percentage of shares and voting rights controlled by Mr. Konstantinos Chalioris, who holds a total of 18,936,558 common registered shares with voting rights of the Company (and the same number of voting rights) a percentage of 43.292%. More specifically, he holds 18,000,983 common registered shares through the aforementioned "Joint Investor Share" and 935,575 common registered shares with voting rights (percentage 2.139%) through his individual share. Mr. Stavros Chalioris, son of Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,491 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage 0.484%) in his individual share and, Mr. Alexandros Chalioris, son of Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,492 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage of 0.484%) in his individual share.

No other person or legal entity owned a percentage over 5% of the share capital.

Amounts in thousand Euro, unless stated otherwise

The data regarding the number of shares and voting rights held by individuals with a significant shareholdings have been derived from the Shareholder Registry kept by the Company and from disclosures by the shareholders provided to the Company according to Law (and MAR).

4. 4. Shares incorporating special control rights

There are no Company shares that provide special control rights to owners.

4.5. Limitations on voting rights

According to the Company's Articles of Association, there are no limitations on voting rights.

4.6. Agreements of Company shareholders

To the knowledge of the Company there are no shareholder agreements, which result in limitations on the transfer of shares or limitations on the exercise of voting rights that emanate from its shares.

4.7. Rules for appointment and replacement of Board members and the amendment of the Articles of Association, which deviate from the provisions of C.L. 4548/2018

The rules stated by the Company's Articles of Association regarding the appointment and replacement of its Board of Directors' members and the amendment of the provisions of its Articles of Association, do not differ from those stipulated by C.L. 4548/2018 as it is in effect.

4.8. Responsibility of the Board of Directors or specific Board members for the issuance of new shares or the purchase of treasury shares.

There is no special and permanent competence of the Board of Directors or some of its members for the issuance of new shares or the purchase of treasury shares according to article 49 of law 4548/2018.The relevant power and responsibility is given to the Company's Board of Directors by virtue of a relevant decision of the General Meeting of its shareholders.

4.9. Significant agreements made by the Company and put into effect, amended or terminated in case of a change in the Company's control following a tender offer.

There are no such agreements, which are put into effect, amended or terminated, in case of a change in the Company's control following a tender offer.

4.10. Significant agreements made by the Company with Board members or the Company's personnel

There are no agreements of the Company with the members of its Board of Directors or its personnel, which provide for the payment of indemnity specifically in case of resignation or termination of employment without reasonable cause, or of the termination of their term or employment, due to a public offering.

SECTION 5: Treasury Shares

The Extraordinary General Meeting of the Company's shareholders on February 2, 2017 decided, inter alia, to approve the purchase of own shares through the Athens Stock Exchange under the provisions of the pre-existing article 16 of Codified Law 2190/1920, which expired on 02-02-2019. Under the aforementioned plan, and until its expiration, the Company acquired 4,324 own shares.

The Extraordinary General Meeting of the Company's shareholders on March 19, 2019 decided, inter alia, to approve the acquisition of own shares through the Athens Stock Exchange in accordance with the provisions of article 49 of law 4548/2018 as currently in force, which expired on 19.03.2022. Under the above plan and until its completion, the Company acquired 318,364 treasury shares, with an average purchase price of 2.4373 Euros per share, which correspond to a percentage of 0.728% of the share capital.

The Annual General Meeting of the Company's shareholders of May 21, 2021 decided, inter alia, to approve the acquisition of own shares through the Athens Stock Exchange in accordance with the provisions of article 49 of law 4548/2018 as currently in force, which expired on 19.03.2022. Under the above plan and until its completion, the Company acquired 428,708 treasury shares, with an average purchase price of 5.89 Euros per share, which correspond to a percentage of 0.98% of the share capital.

The Annual General Meeting of the Company's shareholders of May 25, 2023 decided to approve by unanimously approval the Company's treasury shares buy-back plan in accordance with the provisions of article 49 of Law 4548/2018, as in force, and in particular the purchase within a period of twenty-four (24) months from the date of this decision, i.e. until 24.05.2025, of a maximum number of 4,341,876 common registered shares (with the total treasury shares already owned by the Company, from a previous share buyback program, included and aggregated in relation to the above limit), with a purchase price range between fifty cents of Euro (0.50€) (minimum) per share and ten Euro (10 €) (maximum) per share.

During the execution of the above share buyback program and in execution-implementation of the above decision of the General Meeting of Shareholders, the Company proceeded, in accordance with the provisions of Regulation (EU) 596/2014 of the European Parliament and of the Council as of 16 April 2014 and of the Commission's Delegated Regulation (EU) 2016/1052 as of 8 March 2016, with the purchase of a total of 50,653 common registered shares carrying voting rights, based on an average price of EUR 4.69 per share, corresponding to 0.12% of the equity.

The Company held on 31.12.2023 a total of 802.049 treasury shares which correspond to a percentage of 1.83% of the share capital.

SECTION 6: Review of material financial figures of 2023

1. Group Financial Results

Continuing Operations

The following table depicts the Group's financial results (from continuing operations) for the year 2023 compared to the year 2022:

Financial Results of Year 2023

(Continuing Operations)

(amounts in thousand Euro)	*Year 2023*	*Year 2022*	*Change %*
Turnover	**345,373**	**394,382**	***-12.4%***
Gross Profit	**77,069**	**84,263**	***-8.5%***
Gross Profit Margin	***22.3%***	***21.4%***	
EBIT	**20,663**	**27,407**	***-24.6%***
EBIT Margin	***6.0%***	***6.9%***	
EBITDA*	**44,017**	**48,259**	***-8.8%***
EBITDA Margin	***12.7%***	***12.2%***	
Adjusted EBITDA	**44,017**	**48.850**	***-9.9%***
Adjusted EBITDA Margin	***12.7%***	***12,4%***	
Earnings before Taxes (EBT)	**21,336**	**32,068**	***-33.5%***
EBT Margin	***6.2%***	***8.1%***	
Earnings after Taxes (EAT)	**18,326**	**26,270**	***-30.2%***
EAT Margin	***5.3%***	***6.7%***	
Total EATAM	***17,767***	***25,777***	***-31.1%***
EATAM Margin	***5.1%***	***6.5%***	
Earnings per Share (in euro)	***0.4134***	***0.5985***	**-30.9%**

Note: The alternative performance measures are presented and described analytically in the section 7 of the present Report.

Below, an analysis of the changes observed in key financial figures of the financial results compared to the previous year is included. **It is noted that EBITDA*, Adjusted EBITDA, EBIT and Earnings before Taxes for the year 2022 also include profits from sales of COVID-19 related products amounting to €5.3 mil. Also, EBT of both years include accounting profits from the reversal of provision related to OAED receivable, previously written off (for further details, please refer to section 3.16), of an amount of €1.088 for 2023 and €4.563 for 2022 respectively.**

* EBITDA is defined as operating earnings before taxes, interest, depreciation, financing and investing activities. EBITDA is calculated as follows:

"Operating profit / (loss) before taxes, cash and investment results - continuing operations" plus "Depreciation", where:

- Operating profit / (loss) before taxes, finance and investment results – continuing operations (see "Information by Sector, Statement of Results for the Period", point 3.2): €20,663.
- Depreciation (see "Information by Sector, Statement of Results for the Period", point 3.2): €23,354.

In addition, Adjusted EBITDA is calculated as EBITDA, minus extraordinary, non-recurring profits or expenses, where for the period 01/01/2023 – 31/12/2023, there were no extraordinary, non-recurring profits or expenses.

Turnover

€ 345,373 ***(-12.4%)***

Decrease in consolidated turnover by 12.4%, compared to the previous year, while the volume of consolidated sales is almost at the same level, with an increase of 0.5%. As volume did not change, compared to the previous year, the decrease in Turnover was solely due to the decrease in average selling prices, due to the decrease in the average prices of primary and secondary raw materials as well as the cost of energy during the year. Consequently, this reduction transferred in average selling prices. This is a standard practice of all suppliers in the specific industry, while correspondingly any increases in the average purchase prices of the basic cost elements are passed on to the customers through the average sales prices partly or in total.

In particular and in terms of sales volume, the Packaging sector posted an increase of 4.3% and the Technical Fabrics sector recorded a decrease of 1.1%, compared to the year 2022.

Gross Profit

€77,069 ***(-8.5%)***

Gross profit amounted to €77,069, posting a drop by 8,5% compared to the previous year. However it should be noted that Group also recorded profits due to sales related to Covid-19 products, mainly during the first quarter of 2022, amounted to €5.3 mil. at the level of EBT, EBIT and EBITDA. It is also noted that the machinery related to the COVID-19 products were depreciated using the diminishing balance method, therefore the depreciation of fiscal years 2022 and 2023 related to this specific category of products was immaterial.

The gross profit margin settled at 22.3% compared to 21.4% in 2022.

(EBIT)

€ 20,663 ***(-24.6%)***

Earnings before financial and investing activities and taxes amounted to €20,663, posting a decrease of 24.6%, compared to the previous year, however, the comparison between the two years becomes difficult as on 2022 the Group additionally recorded profits from the sales of personal protective equipment from COVID-19, amounted to €5.3 mil. Therefore, recurring EBIT 2022 from traditional portfolio amounted to € 22,107,after deducting the extraordinary profits due to COVID-19 products. The deviation shown, compared to 2023, is mainly due to the increased depreciation of 2023 (annual depreciation increase of € 2,501). It is also noted that the machines related to the COVID-19 products were depreciated using the diminishing balance method, therefore the depreciation of fiscal years 2022 and 2023 related to this specific category of products was immaterial.

Accordingly, the EBIT margin stood at 6.0% compared to 6.9% in FY2022 and as it has already mentioned the comparison is difficult due to COVID-19 products.

EBITDA

€ 44,017 ***(-8.8%)***

Earnings before financial and investing activities, depreciation, amortization, impairments and taxes amounted to €44,017, recording a drop by 8.8% compared to the previous year, however, the comparison between the two years becomes difficult as on 2022 the Group recorded also profits from the sales of personal protective equipment from COVID-19. The recurring EBITDA of 2022 from traditional portfolio amounted to € 42,959 (excluding profits of €5.3 mil. in EBITDA level from sales of products related to COVID-19). Therefore, in directly comparable terms, the **EBITDA for 2023 recorded an increase of 2.4%, comparing with the previous year.**

Accordingly, the EBITDA margin settled at 12.7% compared to 12.2% during the previous year and as it has already mentioned the comparison is difficult due to COVID-19 products.

Earnings before Taxes (EBT)

€21,336 ***(-33.5%)***

In 2023, EBT amounted to € 21,336, compared to EBT of 2022 of € 32,068. However, these amounts include non-recurring profits, which are summarized as follows:

- Extraordinary profits related to COVID-19 products: In 2022, the Group recorded extraordinary profits of €5.3 mil.
- Extraordinary Profits due to the reversal of provisions, related to claims in relation to OAED (see Note 3.16): For 2023, the extraordinary profits from the reversal of provisions amounted to € 1,088, while for 2022, the amount of the corresponding profits was € 4,563. It is noted that this specific category of profits is included in Financial Income.

Therefore, in comparable terms, excluding the extraordinary profits, EBT 2023 amounted to €20,248 (€21,336 deducting €1,088 due to reversal of provisions), while the corresponding amount for 2022 amounted to €22,205 (EBT €32,068, deducting profits due to COVID-19 of €5,277 and deducting profit due to reversal of provisions of €4,563). The relative decrease is mainly due to increased depreciation and finance costs, as the increased operating profitability (EBITDA) of 2023 partly offset the additional costs.

Accordingly, EBT margin stood at 6.2% compared to 8.1% and as it has already mentioned the comparison is difficult due to COVID-19 products.

Earnings after Taxes (EAT)

€18,326 ***(-30.2%)***

Earnings after taxes amounted to €18,326, posting a reduction of 30.2% compared to the previous year.

Respectively, the profit margin after taxes settled at 5.3% compared to 6.7% in the previous year.
It is noted that, as has been extensively mentioned above, for comparability purposes, the extraordinary profits from COVID-19 products and reversal of provisions should be deducted from EAT

Earnings after Taxes and Non Controlling Interests (EATAM)

€ 17,767 ***(-31.1%)***

Earnings after Taxes and Non-Controlling Interests amounted to € 17,767, posting a decrease of 31.1% compared to the previous year.

Respectively, the profit margin after taxes and non-controlling interests stood 5.1% in 2023 compared to 6.5% in 2022.

It is noted that, as has been extensively mentioned above, for comparability purposes, the extraordinary profits from COVID-19 products and reversal of provisions should be deducted from EATAM as well.

Total Operations

Due to the decision to permanently discontinue the production of Thrace Linq INC, which was decided in order for the Group to focus on more profitable activities, this particular activity is reported in the income statement and other comprehensive income as discontinued operations.

For the completeness of information provided, the following table presents the Group's financial results in total (from Continuing and Discontinued Operations) in 2023, in comparison with the year of 2022:

Financial Results of Year 2023

(CONTINUING & DISCONTINUED OPERATIONS)

(amounts in thousand Euro)	*Year 2023*	*Year 2022*	*Change %*
Turnover	**345,373**	**394,382**	***-12.4%***
Gross Profit	**77,069**	**84,263**	***-8.5%***
Gross Profit Margin	***22.3%***	***21.4%***	
EBIT	**20,663**	**27,391**	***-24.6%***
EBIT Margin	***6.0%***	***6.9%***	
EBITDA	**44,017**	**48,243**	***-8.8%***
EBITDA Margin	***12.7%***	***12.2%***	
Adjusted EBITDA	**44,017**	**48,850**	***-9.9%***
Adjusted EBITDA Margin	***12.7%***	***12.4%***	
Earnings before Taxes (EBT)	**21,336**	**32,052**	***-33.4%***
EBT Margin	***6.2%***	***8.1%***	
Earnings after Taxes (EAT)	**18,326**	**26,235**	**-30.1%**
EAT Margin	***5.3%***	***6.7%***	
Total EATAM	***17,767***	***25,742***	**-31.0%**
EATAM Margin	***5.1%***	***6.5%***	
Earnings per Share (in euro)	***0.4134***	***0.5977***	**-30.8%**

Note: The alternative performance measures are presented and described analytically in the section 7 of the present Report

2. Parent Company's Financial Results

The Company's business purpose, apart from being a holding company, relates also to the provision of support services to its subsidiaries. Specifically the Company's income is generated from the provision of administrative, operating and organizational support services, financial and tax services, IT and consulting services in the areas of marketing and sales, the preparation of financial feasibility studies, and the general provision of consulting services which ensure the proper operation of subsidiaries at all levels.

Specifically for the year 2023, the Turnover of the Company concerning the provision of the above services amounted to € 5,600 against € 5,658 in 2022, therefore remaining essentially at the same levels. The Losses before Taxes, Financial and Investment Results amounted to € 515 in 2023 compared to a loss of € 648 in 2022. Earnings before taxes for the year 2023 amounted to 12,364 compared to € € 12,775 in 2022, posting a decrease of 3.2%. Finally, Earnings after taxes in 2023 amounted to € 11,070 compared to € 11,171 in 2022, recording a decrease of 0.9%.

3. Financial Results of the Group per Business Segment

The operating segments are based on the different product category, the structure of the Group's management and the internal reporting system. Using the criteria, as defined in the accounting standards and based on the different activities of the Group, the business activity of the Group is divided into two business segments, namely "Technical Fabrics" and "Packaging". The information about the sectors of activity which are not reported as separate ones has been collected and presented in the category "Other", which includes the agricultural sector as well as the activities of the Parent Company.

The description and financial results of the Group's operating segments are presented as follows:

Technical Fabrics	Packaging	Other
		
Production and trade of technical fabrics for industrial and technical use.	Production and trade of packaging products, plastic bags, plastic boxes for packaging of food and paints and other packaging materials for agricultural use.	It includes the Agricultural sector and the business activity of the Parent company which apart from the investing activities provides also Administrative – Financial – IT services to its subsidiaries.

During the year 2020, which was characterized by the spread of the coronavirus Covid 19 pandemic, the Group faced significantly increased demand for specific products in its existing product portfolio and particularly in the area of technical fabrics used in personal protection and health applications (Personal Protective Equipment). This high demand continued and peaked in 2021.

Amounts in thousand Euro, unless stated otherwise

During the year 2022, a sharp reduction in demand for products related to the COVID-19 pandemic was observed, resulting into significantly lower sales and profitability for the Group compared to the previous year. The first quarter of 2022 was an exception to the above, as due to the spread of "Omicron" variant but mainly due to the execution of the last part of a contractual agreement signed with a local health system, the Group posted strong profitability which was however much lower than the level of the corresponding period of 2021.

From the year 2023 onwards, having entered into the post-pandemic era, personal protection and health products are not presented separately, following the same pre-pandemic disclosure practice. Instead, they will comprise another product category within the context of the Group's normal business activity.

More specifically, Earnings before Taxes from Continuing Operations at the Group level for 2022 amounted to €32.1 million, of which, according to Management's estimates, €5.3 million were related to COVID-19 products. More specifically, €3.0 million were allocated in the Sector of "Technical Fabrics", and €2.3 million were allocated in the Sector of "Packaging".

The following table summarizes the course of financial results from continuing operations of the individual sectors in which the Group activated during the year 2023. Annual operating and pre-tax profitability (EBITDA and EBT) should be compared to the corresponding profitability of the previous year, without including the extraordinary gains profits from sales of COVID-19 products in the Group and segment results:

FINANCIAL RESULTS PER SEGMENT
(CONTINUING OPERATIONS)

Sector	Technical Fabrics			Packaging			Other		Intra-Segment Eliminations		Group	
	12M 2023	12M 2022	% Ch.	12M 2023	12M 2022	% Ch.	12M 2023	12M 2022	12M 2023	12M 2022	12M 2023	12M 2022
Turnover	**230,755**	274,488	-15.9%	**125,202**	132,672	-5.6%	**5,600**	5,658	**-16,184**	-18,436	**345,373**	394,382
Gross Profit	**47,555**	56,478	-15.8%	**28,875**	27,239	6.0%	**266**	282	**373**	264	**77,069**	84,263
Gross Profit Margin	**20.6%**	20.6%		**23.1%**	20.5%		**4.8%**	5.0%	-	-	**22.3%**	21.4%
EBITDA	**24,635**	29,688	-17.0%	**19,655**	18,892	4.0%	**-263**	-339	**-10**	19	**44,017**	48,259
EBITDA Margin	**10.7%**	10.8%		**15.7%**	14.2%		**-4.7%**	-6.0%	**-**	-	**12.7%**	12.2%

Amounts in thousand Euro, unless stated otherwise

GROUP
Turnover 345,373
12M 2023
GROSS PROFIT 77,069
EBITDA 44,017

PACKAGING
Turnover 125,202
12M 2023
GROSS PROFIT 28,875
EBITDA 19,655

TECHNICAL TEXTILES
Turnover 230,755
12M 2023
GROSS PROFIT 47,555
EBITDA 24,635

OTHER
Turnover 5,600
12M 2023
GROSS PROFIT 266
EBITDA -263

4. Group Consolidated Statement of Financial Position

The following table summarizes the basic financial figures of the Group's financial position as of 31.12.2023:

(amounts in thousand Euro)	31.12.2023	31.12.2022	Change %
Property, Plant & Equipment	**177,670**	**169,218**	***5.0%***
Rights-of-use assets	**3,154**	2,521	*25.1%*
Investment Property	**113**	113	*0.0%*
Intangible Assets	**10,316**	10,357	*-0.4%*
Investments in Joint Ventures	**20,475**	19,921	*2.8%*
Net benefit from funded defined benefit plans	**9,533**	7,169	*33.0%*
Other Long-term Receivables	**138**	132	*4.5%*
Deferred Tax Assets	**326**	357	*-8.7%*
Total Fixed Assets	**221,725**	209,788	*5.7%*
Inventories	**72,003**	**76,415**	***-5.8%***
Income Tax Prepaid	**956**	1,984	*-51.8%*
Trade Receivables	**62,179**	64,769	*-4.0%*
Other Receivables	**21,523**	11,945	*80.2%*
Fixed Assets Held for Sale	**77**	284	*-72.9%*
Cash & Cash Equivalents	**27,801**	39,610	*-29.8%*

(amounts in thousand Euro)	31.12.2023	31.12.2022	Change %
Total Current Assets	**184,539**	195,007	*-5.4%*
TOTAL ASSETS	**406,264**	**404,795**	***0.4%***
TOTAL EQUITY	**277,054**	**267,861**	***3.4%***
Long-term Debt	**27,790**	**31,641**	***-12.2%***
Liabilities from Leases	**1,885**	1,470	*28.2%*
Provisions for Employee Benefits	**1,658**	1,385	*19.7%*
Deferred Tax Liabilities	**7,910**	9,660	-18.1%
Other Long-term Liabilities	**518**	174	197.7%
Total Long-term Liabilities	**39,761**	44,330	*-10.3%*
Short-term Debt	**26,555**	**26,989**	***-1.6%***
Liabilities from Leases	**1,140**	967	*17.9%*
Income Tax	**1,914**	1,048	*82.6%*
Suppliers	**38,462**	40,630	*-5.3%*
Other Short-term Liabilities	**21,378**	22,970	*-6.9%*
Total Short-term Liabilities	**89,449**	92,604	*-3.4%*
Total Liabilities	**129,210**	**136,934**	***-5.6%***
TOTAL EQUITY & LIABILITIES	**406,264**	**404.795**	***0.4%***

Fixed Assets

€ 221,725 ***(+5.7%)***

The increase is mainly a result of the implementation of new investments (asset's additions) during the year, which are significantly greater compared to depreciation for the year.

Current Assets

€ 184,539 ***(-5.4%)***

The decrease in current assets by 5.4% is mainly due to the relative decrease in inventories and receivables, compared to the previous year, as a result of the decrease in the average cost of primary and auxiliary materials, but also of the cost of energy and the consequent reduction of average selling prices. The reduction of these parameters led to the reduction of the average prices of inventories and balance of receivables.

> **Inventories: € 72,003** ***(-5.8%)***

The decrease in Inventories is mainly due to the relatively reduced purchase prices of primary and secondary materials, as mentioned above.

The Average Inventory Turnover Days however stood at 101 days compared to 87 days in 2022.

The Average Trade Receivables Turnover Days stood at 67 days compared to 60 days in 2022.

Equity

€ 277,054 *(+3.4%)*

Equity amounted to € 277,054, posting an increase of 3.4% compared to 31.12.2022.

Provisions for Employee Benefits (Net Asset)

€ 7,875

This asset is mainly due to the valuations of the assets using the updated discount rates. The largest share in the actuarial surplus of the Group comes from Don & Low LTD and the details of its plan are analyzed below.

	31.12.2023	31.12.2022
Present Value of Liabilities	(102,405)	(101,252)
Present Value of Fixed Assets	111,840	108,355
Net Asset Recognized in Balance Sheet	**9,435**	**7,103**

The asset allocation of the plan is as follows:

Asset allocation	31.12.2023	31.12.2022
Mutual Funds (Stock Market)	78,793	13,418
Mutual Funds (Bond Market)	13,971	63,480
Mutual Funds (Diversified Growth Funds)	13,997	22,438
Other	5,079	9,020
Total	**111,840**	**108,355**

The assets of the plan are measured at fair value and consist of Mutual Funds of Baillie Gifford, Legal & General Investment Management as well as Ninety One plc.

Net Debt

€ 29,569

Net debt settled at €29,569, while on 31.12.2022 amounted to €21,457. The Net Debt / Equity ratio stood at 0.11x on 31.12.2023 versus 0.08x on 31.12.2022. The Group's Net Debt / EBITDA ratio for the period under consideration settled at 0.67x. It is noted that on 31.12.2022 the above ratio stood at 0.44x.

An amount of € 13,269 regarding time bank deposits is not included in Cash balance and therefore in Net Debt. These Time Bank Deposits which have been concluded during the current fiscal year, have a duration of more than three months, and the relative amount have been transferred to other receivables. Therefore, adding the Group's time deposits, the Group's Net Debt amounts to € 16.300 (compared to €21.457 in 2022), while the value of the Net Debt / EBITDA ratio is 0.37 (0.44 for 2022), and the value of the Net Debt/ Equity ratio is 0.06 (0.08 for 2022).

Amounts in thousand Euro, unless stated otherwise

Short-term Liabilities
€89,449 *(-3.4%)*

Short-term liabilities amounted to €89,449, compared to €92,604 on 31.12.2022, posting a decrease of 3.4%, which is due to the decrease in Suppliers and Other Current Liabilities.

> **Suppliers:** **€ 38,462** *(-5.3%)*

The decrease in Suppliers is mainly due to the gradually lower purchase prices of primary and secondary raw materials and therefore to the reduction of the relevant liabilities.

The average Suppliers Turnover Ratio settled at 54 days versus 57 days in 2022.

5. Financial Ratios

Following the above analysis, some basic Financial Ratios of the Group based on the Total Operations are presented below:

Ratios	Calculation 2023	2023	2022	Calculation 2022	Explanation
Capital Structure Ratios					
Total Liabilities/Equity	Total Liabilities: 129,210/ Equity: 277,054	0.5	0.5	Total Liabilities: 136,934/ Equity: 267,861	Relation between Liabilities and Equity
Net Debt/ Equity	Net Debt: 29,569/ Equity: 277,054	0.11	0.08	Net Debt: 21,457/ Equity: 267,861	Relation between Debt and Equity
Net Debt/ EBITDA	Net Debt: 29,569/ EBITDA: 44,017	0.67	0.44	Net Debt: 21,457/ EBITDA: 48,243	Relation between Debt and Earnings before Interest, Taxes, Depreciation and Amortization
Fixed Assets/ Total Assets	Fixed Assets: 221,725/ Total Assets: 406,264	0.5	0.5	Fixed Assets: 209,788/ Total Assets: 404,795	Asset Allocation between Current and Non-current Assets
Current Assets/ Total Assets	Current Assets: 184,539/ Total Assets: 406,264	0.5	0.5	Current Assets: 195,007/ Total Assets: 404,795	
Equity/Net Fixed Assets	Equity: 277,054 / Property, Plant & Equipment: 177,670 + Right-of-use Assets: 3,154	1.5	1.6	Equity: 267,861 / Property, Plant & Equipment: 169,218 + Right-of-use Assets: 2,521	The level of financing of the Tangible Assets from the Equity
Leverage Ratios					
Equity/Total Assets	Equity: 277,054/ Total Assets: 406,264	0.7	0.7	Equity: 267,861/ Total Assets: 404,795	Relation between Equity and Total Assets

Amounts in thousand Euro, unless stated otherwise

Ratios	Calculation 2023	2023	2022	Calculation 2022	Explanation
Interest Coverage	EBIT TOTAL: 20,663/ Interest & related (Expense)/Income: 2,550	8.1	14.4	EBIT TOTAL: 27,391/ Interest & related (Expense)/Income): 1,901	Interest Income –Interest Expense Coverage from Operating Earnings (EBIT)
Liquidity Ratios					
Current Ratio	Total Current Assets: 184,539/ Total Short-term Liabilities: 89,449	2.1	2.1	Total Current Assets: 195,007/ Total Short-term Liabilities: 92,604	Total Current Assets/Total Short-term Liabilities
Acid Test Ratio	Total Current Assets: 184,539- Inventories: 72,003/ Total Short-term Liabilities: 89,449	1.3	1.3	Total Current Assets 195,007 - Inventories: 76,415/ Total Short-term Liabilities: 92,604	(Total Current Assets - Inventories)/Total Short-term Liabilities
Profit Margins (%)					
Gross Profit	Gross Profit: 77,069/ Total Turnover : 345,373	22.3%	21.4%	Gross Profit: 84,263/ Total Turnover: 394,382	Gross Profit/ Total Turnover
EBITDA	EBITDA: 44,017/ Total Turnover: 345,373	12.7%	12.2%	EBITDA: 48,243/ Total Turnover: 394,382	EBITDA/ Total Turnover
Adjusted EBITDA	Adjusted EBITDA: 44,017/ Total Turnover: 345,373	12.7%	12.4%	Adjusted EBITDA: 48,850/ Total Turnover: 394,382	Adjusted EBITDA/ Total Turnover
Earnings before Taxes	Earnings before Taxes: 21,336/ Total Turnover: 345,373	6.2%	8.1%	Earnings before Taxes: 32,052/ Total Turnover: 394,382	Earnings before Taxes/ Total Turnover
Earnings after Taxes and Non Controlling Interest (NCI)	Earnings after Taxes and NCI: 17,767/ Total Turnover: 345,373	5.1%	6.5%	Earnings after Taxes and NCI: 25,742/ Total Turnover :394,382	Earnings after Taxes and NCI/ Total Turnover
Receivables and Payables (in days) total					
Average Receivable Days	[(Receivables 2023: 62,179+ Receivables 2022: 64,769)/2] / Turnover 2023: 345,373*365 days	67	60	[(Receivables 2022: 64,769 + Receivables 2021: 64,547)/2] / Turnover 2022: 394,382 *365 days	[(Receivables 2023+ Receivables 2022)/2]/ Turnover 2022*365 days

Amounts in thousand Euro, unless stated otherwise

Ratios	Calculation 2023	2023	2022	Calculation 2022	Explanation
Average Inventory Days	[(Inventories 2023: 72,003 +Inventories 2022: 76,415)/2] / Cost of Sales 2023: 268,304 *365 days	101	87	[(Inventories 2022: 76,415 +Inventories 2021: 71,835)/2] / Cost of Sales 2022: 310,119 *365 days	[(Inventories 2023+ Inventories 2022)/2] /Cost of Sales 2022*365 days
Average Suppliers Days	[(Suppliers 2023: 38,462+ Suppliers 2022: 40,630)/2] /Cost of Sales 2023: 268,304 *365 days	54	57	[(Suppliers 2022: 40,630+ Suppliers 2021: 55,441)/2] /Cost of Sales 2022: 310,119 *365 days	[(Suppliers 2023 +Suppliers 2022)/2] /Cost of Sales 2022*365 days

Consolidated Statement of Cash Flows

In terms of consolidated cash flows, the Group recorded cash and cash equivalents of €27,801 on 31.12.2023 compared to €39,610 on 31.12.2022.

CASH FLOWS	31.12.2023	31.12.2022
EBITDA*	44,017	48,243
Non cash and non-operating movements	(752)	(2,083)
Change in working capital	7,759	(26,379)
Cash Flows from Operating Activities	**51,024**	**19,781**
Interest, Income Taxes & other financial expenses paid	(4,426)	(6,758)
Total inflows/outflows from operating activities	**46,598**	**13,023**
Investing activities	(26,670)	(36,502)
Financing activities	(32,190)	1,003
Net increase/(decrease) in cash and cash equivalents	**(12,262)**	**(22,476)**
Cash and cash equivalents at beginning of period	39,610	63,240
Effect from changes in foreign exchange rates on cash reserves	453	(1,154)
Cash and cash equivalents at end of period	**27,801**	**39,610**

** Refers to Total Operations*

It is noted that Cash and cash equivalents do not include an amount of € 13,269 that concerns time deposits, which have been concluded during the current fiscal year, with a duration of more than three months and the amount have been transferred to other receivables.

Amounts in thousand Euro, unless stated otherwise

SECTION 7: Definition and Reconciliation of Alternative Performance Measures (APM)

In the context of its decision making concerning the financial, operating and strategic planning as well as the evaluation of its performance, the Group utilizes Alternative Performance Measures (APM). These indicators mainly serve the better understanding of the financial and operating results of the Group, its financial position as well as its cash flow statement. The Alternative Performance Measures (APM) should be always taken into account in line with the financial statements which have been prepared according to the International Financial Reporting Standards and in no case the APM replace the above.

Alternative Performance Measures

In the analysis of the developments and the performance of the Group, ratios such as the EBIT and the EBITDA are utilized.

EBIT *(The indicator of earnings before financial and investing activities as well as taxes)*	The EBIT serves the better analysis of the Group's operating results and is calculated as follows: Turnover minus Cost of Sales plus other operating income minus the total operating expenses, before the financial and investing activities and taxes. The EBIT margin (%) is calculated by dividing the EBIT by the total turnover
EBITDA *(The indicator of operating earnings before financial and investing activities as well as depreciation, amortization, impairment and taxes)*	The EBITDA serves the better analysis of the Group's operating results and is calculated as follows: Turnover minus Cost of Sales plus other operating income minus the total operating expenses before the depreciation of tangible assets, the amortization of grants and the impairments, as well as before the financial and investing activities and taxes. The EBITDA margin (%) is calculated by dividing the EBITDA by the Turnover.
Adjusted EBITDA *(The adjusted indicator of operating earnings before financial and investing activities as well as depreciation, amortization, impairment and taxes)*	The Adjusted EBITDA is the EBITDA less any restructuring, acquisition, merger, and other non-recurring expenses that may be realized within the period / year, as well as any non-recurring gains (e.g. gain from the sale of property, plant and equipment).
Net Debt	It is calculated as the sum of long-term loans plus long-term lease liabilities plus short-term loans plus short-term lease liabilities minus the balance of cash & cash equivalents.

Net Debt / Equity	It is calculated as the ratio of Net Debt (see above) to Total Equity.
Net Debt / EBITDA	It is calculated as the ratio of Net Debt (see above) to EBITDA.

SECTION 8: Sustainable Development

The goal of the Group through its principles, policies, and strategies for sustainable development is to grow with respect for society and the environment, developing solutions for a sustainable future. Priorities include providing sustainable products within the framework of the circular economy, increasing the use of recycled raw materials, continuously reducing waste to landfill, investing in renewable energy sources, and designing actions that will further reduce the environmental footprint throughout the value chain. The approach to sustainable development is based on the following six principles: (1) Support circular economy, (2) Deal with climate change, (3) Empower human capital, (4) Contribute to society, (5) Operating with integrity, (6) Ensure business continuity. The Group has implemented and enforces a sustainable development policy and has developed a specific strategic plan. The main risks and their management, performance, and commitments within the framework of the UN Sustainable Development Goals are described in detail in the annual Sustainable Development and Non-Financial Information Reports.

SECTION 9: Prospects and Outlook of the Group for the Financial Year 2024

It is included in Section 1: «Significant events that took place during the financial year 2023» of this Annual Report by the Bord of Directors, subparagraph II. «Prospects of the Group».

SECTION 10: Events after the Reporting Period

The following paragraphs present the significant event that took place after the end of the financial year 2023 and up to the date of issuance of this Report:

Proposed Dividend for the Year 2023

The Board of Directors of the Company, with its meeting of April 22nd, 2024, unanimously decided to propose to the Annual Ordinary General Meeting of shareholders the approval of the distribution (payment) of the profits of the fiscal year that ended on 31.12.2023 and in particular to propose the distribution (payment) to the shareholders of a dividend of a total amount of 10,250,000.00 Euros (gross amount), i.e. 0.2343314986 Euros per share (gross amount) from the profits of the fiscal year 2023 (01.01.2023-31.12.2023), but also from profits of previous years.

Given that the Company, pursuant to the relevant decision of the Board of Directors dated September 25th, 2023, has already distributed to the shareholders the interim dividend for the fiscal year 2023 of a total amount of 3,000,000.00 Euros (gross amount), i.e. 0.0685848289 Euros per share (gross amount), the Board of Directors will subsequently propose to the Annual Ordinary General Meeting of shareholders the distribution of the remaining amount of the dividend, and in particular the amount of 7,250,000.00 Euros (gross amount), i.e. 0.1657466698 Euros per share (gross amount), which gross amount per share will be increased by the amount corresponding to the treasury shares that the Company will hold on the dividend cut-off date (and which treasury shares are not entitled to the payment of the dividend, by the provisions of article 50 of Law 4548/2018, as applicable.)

The Annual Ordinary General Meeting of shareholders will take the final decision concerning the approval of the above proposal.

There are no other events after the reporting period that have a significant impact on the financial statements of the Group.

Corporate Governance Statement

SECTION 11: Corporate Governance Statement

The current Corporate Governance Statement is compiled according to the provisions of a. 152 of L. 4548/2018, and a.18 of L.4706/2020, as applicable at the time of drafting of this Report, Hellenic Corporate Governance Code, which was adopted and applied by the Company, and the executive decisions of the Hellenic Capital Market Commission issued by authorization of law 4706/2020, constitutes special and separate section of the Annual Management Report of the Board of Directors and contains the entire information required by the law.

Specifically, the **structure of the present Corporate Governance Statement** (hereinafter called as "**Statement**" or "**CGS**") is as follows:

I. Compliance Statement with the Corporate Governance Code
II. Deviations from the Corporate Governance Code
III. Corporate Governance Practices applied by the Company apart from those stated by regulatory framework.
IV. Description of the internal control and risk management system as regards to the process for preparing financial statements
V. Information regarding the Company's audit process (information stipulated by items (c), (d), (f), (h) and (i) of paragraph 1 of article 10 of Directive 2004/25/EC)
VI. Board of Directors and Committees
VII. General Meeting and Shareholders' Rights
VIII. Sustainable Development Report

I. COMPLIANCE STATEMENT WITH THE CORPORATE GOVERNANCE CODE

The Company applies the principles of corporate governance, as they are defined in the current legislative and regulatory framework in general. In full and effective compliance with the provisions of article 17 of law 4706/2020 and article 4 of Decision No. 2/905/03.03.2021 of the Board of Directors of the Hellenic Capital Market Commission, the Company proceeded based on the relevant decision of the Board of Directors dated 16.07.2021 to the adoption and implementation of the Hellenic Corporate Governance Code (hereinafter called as the "**Code**"), which was drafted by the Hellenic Corporate Governance Council in June 2021 and is available at: http://www.esed.org.gr/code-listed, to which (Code) the Company states that it complies without any deviations. The Company, by taking and applying the appropriate, necessary and proper decisions and measures, proceeded to its full, effective, substantial and timely compliance and harmonization with the provisions of Law 4706/2020 (Government Gazette A136/17.07.2020), as it applies today and under which laws substantially reformed and updated the regulatory framework for corporate governance, by upgrading the required organizational structures and corporate governance processes, increasing the principle of transparency and strengthening the confidence of shareholders and the investors community in general, in order for societe anonyms whose shares are listed on the regulated market to meet the increased demands of the modern capital markets.

II. DEVIATIONS FROM THE CORPORATE GOVERNANCE CODE

The Company, as mentioned above, taking into account in each case the particularities of its organizational structure and operation, decided voluntarily to adopt and implement the Hellenic Code of Corporate Governance. The Code is applied on the basis of the principle "Comply or explain", which requires companies that comply with the Code to either comply with all of its provisions, or to explain substantively the reasons for their non-compliance with its specific practices, while the explanation of non-compliance reasons should not be limited to a simple reference to the practice with which the Company does not comply, but should be justified in a specific, definite, comprehensible, meaningful, complete and convincing manner.

The Company fully complies with all provisions, specific practices and principles defined by the Hellenic Code of Corporate Governance. At the same time, the Company assesses on a regular basis its compliance with all provisions and specific practices of the Corporate Governance Code and proceeds with the implementation of any appropriate, necessary mitigating actions, if this is required, in order to ensure the full, substantial and timely compliance and harmonization with the provisions of the Code.

III. CORPORATE GOVERNANCE PRACTICES APPLIED BY THE COMPANY APART FROM THOSE STATED BY REGULATORY FRAMEWORK

As regards to corporate governance issues, the Company applies faithfully and without any deviations the provisions of laws 4548/2018, 4706/2020 and 4449/2017 as currently in force, as well as the Hellenic Corporate Governance Code, the provisions and regulations of which it has as much as possible, incorporated in its Articles of Association, its Internal Operation Rulebook, in the Rules of Procedure of the Committees, in the Manual of Internal Control and in all the individual procedures and policies it has established and implements.

At the present time and when the Corporate Governance Statement was drafted, there are no applicable practices in addition to the provisions of the law. Moreover, the Company applies the above provisions and the Hellenic Corporate Governance Code to the rules of procedure of its committees, in other regulations, codes, procedures and policies. Finally, it is noted that the Company is fully harmonized with the provisions of the law 4706/2020 on corporate governance.

IV. DESCRIPTION OF THE INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM OF THE COMPANY AND THE GROUP AS REGARDS TO THE PROCEDURE OF PREPARING FINANCIAL STATEMENTS AND ASSESSMENT RESULTS

The Internal Control System consists of the functions established by the Group, i.e. both the parent Company and all other companies included in the consolidation, in order to ensure the protection of its assets, to identify and address the most important risks it faces or may face in the future, to ensure that the financial data on the basis of which the financial statements are prepared (separate and consolidated) are correct, true and accurate, and also to ensure that the laws and the applicable regulatory framework are applied, as well as the principles the procedures and the policies adopted by the Management.

For the development of this System, the Management of the Group, has reviewed and implemented various Policies, Procedures and Rules, which have been included in its Internal Operation Rulebook.

Its implementation covers the Management of Potential Risks in relation to the process of drafting Financial Statements (separate and consolidated) in the following three (3) areas:

1. Entity level controls applied by the Company and each of the other companies included in the consolidation at a parent level,
2. Financial reporting process controls implemented by both the Company and all other companies included in the consolidation during the process of drafting financial statements, separate and consolidated,
3. IT controls embedded into the information systems applied by the Company as well as all other companies included in the IT systems framework.

Specifically:

1) Entity level controls

Role and Responsibilities of the Board of Directors: The Board of Directors decides on any action that concerns management of the Company, management of its assets and in general on anything that relates to the achievement of its objective and the promotion of its business activities.

Additionally, the Board of Directors:

- Determines the main responsibilities and the objective of each Division, so that the CEO can then assign to each Director the responsibility of allocating the above to his/her subordinates.
- Proposes to the General Meeting of Shareholders the appointment of the Company's External Auditors, following a proposal by the Audit Committee, and the determination of their remuneration.
- Is responsible to prepare a report with detailed transactions of the Company with its related parties, which is disclosed to the regulatory authorities.
- Is responsible for the preparation of the Remuneration Report according with article 112 of Law 4548/2018.

Preparation of Budget and Monitoring its Implementation at the Board of Directors level: The Annual Budget, which is also a guide for the Group's financial development, is prepared on an annual basis (consolidated and also per segment/subsidiary) and is presented to the Company's Board of Directors for approval. The reports with the actual financial results are issued periodically, accompanied by the condensed reports including the explanations of deviations and are discussed at the Board level.

Internal Operation Rules: The Company's Internal Operation Rulebook is also the manual for its Internal Control System, which among others includes the following:

- Description and guidance on managing the different operations
- Control points in stand-alone procedures
- Delegation of responsibilities

- Authorizations and limits of expense approvals
- Instructions for Controls on the main sections of the Internal Control System.

The adequacy of the Internal Control System is monitored on a systematic basis by the Audit Committee through regular meetings that take place with the Internal Audit and the Risk and Compliance Management Department in the context of monitoring the Annual Audit Program for the Company and the Group, which is prepared based on the relevant risk assessment.

2) Financial reporting process controls

In order to ensure fully and adequately that the financial data, based on which the financial statements of both the Company and the Group (annual and quarterly financial statements) are correct, true and accurate, the Company applies specific control procedures that include the following:

- The postings from the Company's accounting department are performed based on a specific process that ensures the authenticity and genuineness of the documents (electronic and paper) and requires all documents to carry the respective signed approvals.
- The Company maintains a Fixed Asset Register in the Fixed Assets sub-system and applies depreciation rules according to the International Financial Reporting Standards and Tax Rules in effect.
- The Accounting Department carries out periodic reconciliation of balances of payroll, customers, suppliers' accounts, VAT, etc.
- The Group prepares the consolidated budget on an annual basis. Each subsidiary prepares its corporate budget in alignment with the objectives of the Group. These budgets shall be submitted to the Board of Directors of the Company for approval.
- Each month a detailed financial results presentation is prepared per segment/subsidiary and on a consolidated Group level. This presentation is submitted to the Company's Management.
- Companies that constitute the Group follow common accounting standards and procedures in line with the International Financial Reporting Standards (IFRS).
- At the end of each period, the accounting standards of the parent and subsidiary companies prepare their financial statements according to the International Financial Reporting Standards (IFRS).
- The Statutory departments of the Group collect all the necessary data from subsidiaries, consolidation entries are applied, and the financial statements of the Group are prepared according to the International Financial Reporting Standards (IFRS).
- There are specific financial statements closing processes, which include deadlines for submission, responsibilities and update on the required actions.
- The financial statements are audited by Chartered Auditors-Accountants whose work is monitored by the Audit Committee, which then proposes their approval to the Company's Board of Directors.

- The Departments of Internal Audit and Risk & Compliance periodically perform audits to confirm the accuracy, completeness, and correctness of financial statements.

3) IT controls

The Group IT Department is responsible for supporting the Group's and the Company's IT applications. This Department has established robust IT controls framework, which ensures the support of the short-term and also the long-term objectives of the Company and the Group.

All applicable procedures are described in detail by the Company's Internal Operation Rulebook. It is noted that all the companies of the Group follow the Group Policies Manual and fully comply with its basic principles, rules, and procedures, in order to ensure the reliable and adequate implementation of the control of information systems of all companies within the Group. The most important of these procedures are listed below:

- Back Up process (in Hardware): According to the Operation Rulebook, the IT Service is required to develop the appropriate infrastructure and maintain an alternative information system to replace the system/applications in use, in case of damage in the Company's and the Group's central IT system.
- Safekeeping (Confidential) of the Company's and the Group's Electronic Files: The IT Department applies the appropriate systems that ensure the "non" leakage of the Company's and the Group's IT data.
- Files of the Central System: Particular emphasis is given to the access of the data room where the Central System is hosted, which is provided only to IT authorized employees by the Administrator. The access is controlled adequately and at regular basis.
- In addition to the main systems/platforms of the Company and the Group (e.g., ERP-SAP, Consolidation Platform, etc.), cloud infrastructures (Microsoft Azure) are leased, after ensuring that they adhere to the strictest security protocols.
- Files –Software of the Peripheral Systems: Access to files and system software is granted to specific individuals with the use of personal passwords.
- Processes for Security of the Central and Peripheral Systems: In the context of protecting the Group's IT system, and taking advantage of the latest technology available, the IT Department applies advanced security practices, such as antivirus security software, e-mail security, firewalls etc.

The Audit Committee of the Company monitors continuously and systematically the adequacy of the Company's Internal Control System, given that:

- It has approved the Company's Internal Operation Rulebook which has incorporated the appropriate Policies, Processes and Rules that comprise the Internal Control System applied by the Company, including Group's Policies Manual, which concerns the common policies and procedures applied by the subsidiaries.
- The members of the Company's Audit Committee as well as the Members of the Board of Directors are recipients of the reports prepared by the Company's Internal Audit Unit and the Regu-

latory Compliance & Risk Management Department of the Company. In these reports, the Company and the Group's operations are assessed as well as the adequacy of Internal Control Systems applied.

Assessment of the Internal Control System

According to article 14 par. 3 case j of Law 4706/2020 and nr. 1/891/ 30.9.2020 decision of the Board of Directors of the Hellenic Capital Market Commission, as amended by nr. 2/917/17.6.2021 decision of the Board of Directors of the Hellenic Capital Market Commission as in force, a periodic assessment of the Internal Control System of the Company took place with a reporting date of 31.12.2022 and a reporting period from the commencement of the effectiveness of article 14 of Law 4706/2020 (17.07.2021), particular as to the adequacy and effectiveness of the financial information, on an individual and consolidated basis, in terms of risk management and regulatory compliance, in accordance with recognized compliance and internal control standards, as well as the implementation of the provisions on corporate governance of Law 4706/2020.

This assessment was carried out by an independent auditor who meets the provisions of Law 4706/2020 and the abovementioned decision of the Hellenic Capital Market Commission's Board of Directors, in accordance with the relevant policy / procedure, for the periodic assessment of the Company's Internal Control System. In specific, the registered in Public Registry of article 14 of Law 4449/2017 auditing Company PRICEWATERHOUSECOOPERS Auditing Company SA (AM SOEL 113) was appointed pursuant to the decision of the Board of Directors of the Company of 11.03.2022, following the relevant proposal of the Audit Committee of the Company of 08.03.2022, together with the Board of Directors' decision dated 16.07.2021, which determined the significant subsidiaries included in the scope of the assessment (namely, Thrace Nonwovens & Geosynthetics S.A, Thrace Plastics Pack S.A. and Don & Low Ltd Scotland).

The scope of the assessment, which was decided by the Board of Directors of the Company, includes all the topics of the assessment as described in chapter ii.b of the decision 1/891/30.09.2020 of the Board of Directors of the Hellenic Capital Market Commission. More specifically, the scope of the assessment included the Control Environment, the Risk Management framework, the Control Activities, the Information and Communication framework and the Internal Controls System Monitoring.

The assessment of the Internal Control System was conducted by Mr. Evangelos Venizelos, Chartered Auditor-Accountant (SOEL Reg.Nr.39891), in PRICEWATERHOUSECOOPERS Auditing Company SA, with a reference date of 31.12.2022.

According to the "Internal Control System Adequacy and Effectiveness Assessment Report" dated 20.03.2023 of the aforementioned Auditing Company, which was submitted to the Company after the completion of the assessment of the Company's Internal Control System, based on the work carried out, as well as the evidence obtained, regarding the assessment of the adequacy and effectiveness of the Internal Control System of the Company and its significant subsidiaries with a reference date of 31.12.2022, **nothing that could be considered a material weakness of the Company's Internal Control System and its significant subsidiaries has come to the auditing Company attention, in**

accordance with the Regulatory Framework (article 14 par. 3 par. j' and par. 4 of Law 4706/2020, Decision of the Board of Directors of the Capital Market Commission nr. 1/891/30.09.2020, as amended by the decision of the Board of Directors of the Capital Market Commission nr. 2/917/17.06.2021 as in force).

Therefore, due to the absence of any material findings, there is no need to apply the provisions of section ii. c of the Decision No 1/891/30.9.2020 of the Board of Directors of the Hellenic Capital Market Commission, as amended by the decision No 2/917/17.6.2021 of the Board of Directors of the Hellenic Capital Market Commission as in force, and paragraph A of the letter No 425/21.02.2022 of the LISTED COMPANIES DIVISION, (Listed Companies Supervision Department) of the Hellenic Capital Market Commission with subject: "Highlights, clarifications and recommendations regarding the actions of listed companies in view of the publication of the Annual Financial Reports and the implementation of Law 4706/2020 "Corporate governance of joint-stock companies, modern capital market, incorporation into Greek legislation of Directive (EU) 2017/828 of European Parliament and of the Council, measures to implement Regulation (EU) 2017/1131 and other provisions" do not apply. Those regulations and guidelines require that the Corporate Governance Statement must include a response by the Company's Management for the significant deficiencies, including a brief reference to the action plans and the relevant timetable in place to resolve them, as well as a brief reference to the actions taken by the Company during the reporting year to resolve the deficiencies in question, based on the aforementioned action plan.

Assessment of the Corporate Governance System

In accordance with article 4 par. 1 of Law 4706/2020 as currently in force, and in compliance with the above regulatory framework, an assessment of the Company's Corporate Governance System was carried out, with a reference date of 31.12.2023 and a reference period from the entry into force of article 4 of Law 4706/2020 (17.07.2021).

According to the detailed definition of article 13 of Law 4706/2020, the Corporate Governance System includes the internal control system, the prevention, identification and suppression of conflict of interest cases, mechanisms to facilitate the exercise of shareholders' rights and finally the remuneration policy

The following areas were examined/assessed within the content of the assessment of the Corporate Governance System:

a) The adequacy and effectiveness of the Internal Control System[1] (of Holding Company and its significant subsidiaries), in particular with regard to the adequacy and effectiveness of financial reporting, on an stand-alone and consolidated basis, in terms of risk management and regulatory compliance, in accordance with well-established assessment and internal control

1 *This subject area is partially covered by the assessment that took place during the previous year by Mr. Evangelos Venizelos, Chartered Auditor-Accountant (SOEL Reg.Nr.39891), in «PRICEWATERHOUSECOOPERS Auditing Company SA» (SOEL Reg.Nr.113) with a reference date of December 31, 2022 and includes the significant subsidiaries of the Company.*

standards, as well as the application of the corporate governance provisions of Law 4706/2020.

The scope of the assessment, as decided by the Board of Directors of the Company, included all the areas of the assessment, as described in chapter ii.b of the decision 1/891/30.09.2020 of the Board of Directors of the Capital Market Commission. More specifically, the scope of the assessment included the Control Environment, the Risk Management framework, the Control Activities, the Information and Communication framework and the Internal Control System Monitoring.

b) The adequacy and effectiveness of the procedures for the prevention, detection and suppression of situations of conflict of interest.

c) The adequacy and effectiveness of the communication mechanisms with the shareholders, in order to facilitate the exercise of their rights and the active – constructive dialogue.

d) The remuneration policy, in order to ascertain whether it actually serves the business strategy, the long-term interests of the Company and its sustainability.

e) The adequacy of the Company's Operating Regulations in accordance with article 14 of Law 4706/2020 .

f) Any deviations from the use of funds raised in accordance with article 22 of Law 4706/2020 (if applicable)2.

g) The disposal of any assets of the Company in accordance with article 23 of Law 4706/20202, and finally

h) The degree of compliance of the Company with the Hellenic Corporate Governance Code (HCGC) of the Hellenic Corporate Governance Council adopted and applied by the Company[2].

This assessment was carried out by the Secretary of the Board of Directors with the assistance of the Regulatory Compliance & Risk Management Unit and the Audit Committee, as defined by virtue of the decision of the Board of Directors of the Company dated 03.11.2023, following the relevant recommendation of the Audit Committee of the Company to the Board of Directors dated 25.10.2023.

According to the "Report on the Assessment of the Adequacy and Effectiveness of the Corporate Governance System" dated 26.03.2024, which was disclosed to the Board of Directors of the Company regarding the work carried out: "The Company has adopted and implements a complete, adequate and effective Corporate Governance System taking into account the size, nature, scope and complexity of its activities and which includes everything provided for by the current legislation." The above results are another confirmation that the Company is in continuous compliance with the current legislative and regulatory framework that governs its Internal Control System and Corporate Governance System for the purpose of their lawful and smooth operation.

Following the above, and after the end of the Company's fiscal year 2023 (01.01.2023-31.12.2023), the Board of Directors conducted an annual review of the corporate strategy, the main business risks facing the Company in the industry in which

2 *The above items e) to h) are specific subject areas, not included in the narrow core of the CGS, however they are assessed as necessary in view of the formulation of a. 4 par. 1 (referring to the CGS, provisions 1-24 of Law 4706).*

it operates and the internal control systems it applies, and its findings were the following:

- the Company's strategy and the business plan are implemented properly and according to the planning of the individual Divisions, in order for the Company to continue to stand out for the promotion of innovative products that meet the constantly evolving and most demanding needs of its customers, creating value for its people, contributing to the local community and building relationships of trust,
- The main business and financial risk areas of the Company as well as the issues that may have a significant impact on the financial statements of the Company and Group, have been reported in detail in the relevant Section of the Board of Directors Report,
- The internal audit is carried out in accordance with the current legislative and regulatory framework and the principles of the Code of Ethics and covers the main activities of the Company, in order to assess in time any deficiencies, errors, weaknesses and possible fraud that may result in a misappropriation and/or loss of assets and verify the credibility of the entity's financial figures.

Non-audit services provided by the external auditor

The Auditing Company, which is in charge of carrying out the mandatory audit (or review where applicable) of the annual and semi-annual financial statements (stand-alone and consolidated), as well as the issuance of the tax certificate, provided to the Company the following non-audit services during the closing year 2023 (01.01.2023-31.12.2023):

(a) Report on the determination of Research and Development (R&D) expenses and their amount carried out by the Company for the period 01/01/2022 to 31/12/2022, based on the provisions of article 22a and of the joint ministerial decision 100335/2019.

(b) Report on agreed upon procedures regarding "Certificate of Conformity" of "Thrace NonWovens & Geosynthetics S.A." to "EUROBANK SA" and "ALPHA BANK" and "NATIONAL BANK OF GREECE SA" on 31.12.2022.

(c) Report on agreed upon procedures regarding the "Certificate of Conformity of "Thrace Polyfilms SA" to "National Bank of Greece SA" on 31.12.2022.

(d) Technical support on the compliance of Thrace Polybulk A.S. with the Norwegian tax and accounting framework.

(e) Participation in a seminar on the basic financial figures used by modern HR Departments to monitor the organization and make their decisions (HR Metrics & Analysis).

However, the fact that the Auditing Company provided the above (non-audit) services had no effect, direct or indirect, on the independence, objectivity, integrity, reliability and effectiveness of the statutory audit, as the provision of the specific services took place from a completely different team of the said Auditing Company and from other persons, who have no involvement and participation (direct or indirect) in the process of conducting the statutory audit of the financial statements (annual and semi-annual, stand-alone and consolidated) where appropriate, or were performed under adequate safeguards and rules and by nature these services cannot jeopardize their independence, which is additionally ensured by the strict internal procedures and protocols applied by the Auditing Company itself.

All the above non-audit services were approved by the Audit Committee.

V. INFORMATION REGARDING THE COMPANY'S CONTROL FRAMEWORK (INFORMATION OF ITEMS (C), (D), (F), (H) AND (I) OF PARAGRAPH 1 OF ARTICLE 10 OF DIRECTIVE 2004/25/EC OF THE EUROPEAN PARLIAMENT AND THE COUNCIL, OF 21ST APRIL 2004.)

Significant direct or indirect shareholdings (including indirect shareholdings through pyramid structures or cross-participation) according to the definition of article 85 of Directive 2001/34/EC

As regards to significant shareholdings in the share capital and voting rights of the Company, according to the definition of article 85 of Directive 2001/34/EC and the provisions of articles 9 up to 11 of Law 3556/2007, the shareholders of the Company with percentages above 5%, as of 31.12.2023, are:

LAST NAME	NAME	SHARES IN J.I.A.*	SHARES OUT OF J.I.A.*	TOTAL SHARES	VOTING RIGHTS
Chalioris	Konstantinos	41.15%	2.14%	43.29%	43.29%
Chaliori	Effimia	-	20.85%	20.85%	20.85%
Chalioris	Alexandros	20.58%	0.48%	21.06%	0.48%
Chalioris	Stavros	20.58%	0.48%	21.06%	0.48%

* *the relevant announcement was posted on the Company's website on March 10, 2023 and it mentions:*

Mr. Konstantinos Chalioris, shareholder and Chairman of the Board of Directors of the Company, transferred from his individual share, to two "Joint Investor Shares" (KEM), the first one jointly created with his son Alexandros Chalioris and the second one jointly created with his son Stavros Chalioris (himself being the first beneficiary in both "Joint Investor Shares"), a total of 18,000,983 common registered shares with voting rights, i.e. a percentage of 41.153% of a total of 43,741,452 common registered shares with voting rights of the Company.

However, following the above, there was absolutely no change in the number and percentage of shares and voting rights controlled by Mr. Konstantinos Chalioris, who holds a total of 18,936,558 common registered shares with voting rights of the Company (and the same number of voting rights) a percentage of 43.292%. More specifically, he holds 18,000,983 common registered shares through the aforementioned "Joint Investor Share" and 935,575 common registered shares with voting rights (percentage 2.139%) through his individual share.

2. *Mr. Stavros Chalioris, son of Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,491 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage 0.484%) in his individual share and,*
3. *Mr. Alexandros Chalioris, son of*

Amounts in thousand Euro, unless stated otherwise

Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,492 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage of 0.484%) in his individual share.

No other individual or legal entity has a shareholding of more than 5.00% of the Company's share capital and voting rights. Data regarding the number of shares and voting rights of individuals owning significant shareholdings, has been derived by the Shareholders' registry kept by the Company and the notifications made to the Company by the shareholders according to Law (and MAR).

Owners of any type of titles that provide special control rights and description of such rights.

There are no securities, including the Company's shares that provide owners with special control rights.

Any kind of limitations on voting rights, such as limitations on voting rights of owners that hold a specific percentage or number of votes, the exercise deadlines for voting rights, or systems through which, with the cooperation of the Company, financial entitlements that derive from the titles are distinguished from the ownership of the titles.

The Company's Articles of Association provides no limitations to voting rights deriving from its shares.

Rules governing the appointment and replacement of the Board members as well as the amendments of the Articles of Association.

The rules included in the Company's Articles of Association, both as regards to the appointment and the replacement of Board Members and as regards to its amendments, do not differ from those stated by the L. 4548/2018 as it is in effect.

The authorities of Board members, specifically as regards to the ability to issue or buy-back shares.

There is no specific statutory authority granted to the Board of Directors or some of its members for the issuance of new shares or the purchase of treasury shares according to article 49 of law 4548/2018.

The relevant power and responsibility are given to the Company's Board of Directors by virtue of a relevant decision of the Shareholders General Meeting.

In accordance with this framework, the Annual Ordinary General Meeting of the shareholders of 24 May 2023 decided by majority the approval of Company's shares buy-back program in accordance with the provisions of article 49 of L. 4548/2018, as in force, and in particular approved the purchase within a period of twenty-four (24) months from the date of adoption of this resolution, namely no later than 24.05.2025, of a maximum of 4.341.876 common, registered shares, (including and specifically aggregated in relation to the above limit of the total of the Company's own shares already held within the framework of previous share buy-back programs) with a purchase price range from fifty eurocents (€ 0.50) per share (minimum price) to ten Euro (€ 10,00) per share (maximum price).

VI. BOARD OF DIRECTORS AND COMMITTEES

1) Composition of the Board of Directors

According to article 7, paragraph 1 of its Articles of Association, as in force after its amendment by the Extraordinary General Meeting of Shareholders on 19 March 2019, for the purpose of harmonization with the provisions of Law 4548/2018 and as amended by the Ordinary General Meeting of May 24, 2023, the Company is managed by a Board of Directors (hereafter called as "the Board of Directors") which consists of seven to fifteen (7-15) members. The members of the Board of Directors are elected by the General Meeting of shareholders, may be shareholders or not and have a five-year term, which is extended until the expiration of the term within which the next Ordinary General Meeting must convene and until a relevant decision is taken, but in any case, should not exceed a six-year term.

- In case of resignation, death or in any other way loss of the capacity of the membership of one or many members of the Board of Directors, the remaining members may either elect members of such in replacement of the above or may continue the management and representation of the Company without any replacement, with the condition that the number of the remaining members is not less than half of the number of members during the time such events occurred. In no case, the Board members are allowed to be less than three (3).
- Without prejudice to the provisions of Corporate Governance law 4706/2020 in case of electing a replacement, the decision for the election is subject to the disclosure requirements of article 13 of L. 4548/2018, as currently in effect, and is announced by the Board of Directors at the next General Meeting, which can even replace those elected, even if the relevant issue had not been included in the General Meeting agenda.
- The actions of the elected temporary replacement are valid even if the General Meeting does not validate his/her election or even if it has elected or not another permanent member of the Board.
- The term of the new Board member is terminated when and whenever the term of the replaced member would have been terminated.

The Extraordinary General Meeting of Shareholders of 11 February 2021 elected a new 11-member Board of Directors for a 5-year term, i.e. until 11/02/2026, extended until the date of the next Ordinary General Meeting and until a relevant decision is being made, consisting of the following members:

1. Konstantinos Chalioris of Stavros,
2. Theodoros Kitsos of Konstantinos,
3. Dimitrios Malamos of Petros,
4. Vassilios Zairopoulos of Stylianos,
5. Christos Shiatis of Panagiotis,
6. Christos-Alexis Komninos of Konstantinos,
7. Petros Fronistas of Christos,
8. Georgios Samothrakis of Panagiotis,
9. Myrto Papathanou of Christos,
10. Spyridoula Maltezou of Andreas and
11. Nikitas Glykas of Ioannis.

Furthermore, during the Annual Ordinary

General Meeting of shareholders of May, 25, 2022, (Topic 12th) the election of Mr. Athanasios Dimiou of Georgios, as the new non-executive member of the Board of Directors in the position and for the remaining of the term (i.e. until 11.02.2026) of the resigned non-executive member Mr. Petros Fronistas of Christos was announced to the body of shareholders in accordance with the provisions of article 82 par. 1 of law 4548/2018, as in force.

The abovementioned election took place during the meeting of the Board of Directors of the Company on July 28, 2021 and following the relevant nomination of the Remuneration and Nominations Committee of the Company and in full compliance and alignment with the suitability (individual and collective) and diversity principles and criteria adopted and implemented by the Company. Following the above, the Board of Directors of the Company was reconstituted into a body for the remainder of its term, namely until 11.02.2026.

The minutes of the Board of Directors meeting held on 28.07.2021 with subject the replacement of the resigned, were registered in the General Commercial Register (G.E.M.I.) on 03.08.2021 with Registration Code 2596045, issued with protocol number 2415279/03.08.2021 following the relevant announcement of the Ministry of Development and Investment (General Secretariat of Commerce & Consumer Protection, General Directorate of Market, Directorate of Companies, Department of Supervision of Listed SAs & Sports SA).

It should be underlined that at the time of drafting this Report there are not any changes regarding the independent non-executive members of the Company's Board of Directors, who were appointed in the Extraordinary General Meeting of Shareholders on February 11, 2021. The non-executive members of the Board of Directors are: 1) Theodoros Kitsos of Konstantinos, 2) Georgios Samothrakis of Panagiotis, 3) Myrto Papathanou of Christos, 4) Spyridoula Maltezou of Andreas and 5) Nikitas Glykas of Ioannis, who all meet in their entirety the independence requirements and criteria set forth by the current legislative framework (article 9, par.1 and 2 of Law 4706/2020), namely:

(a) They do not hold directly or indirectly a percentage of voting rights greater than 0.5% of the Company's share capital and

(b) They are free from any dependent relationship with the Company or persons affiliated with it and do not maintain any financial, business, family, or other relationship, which may affect their decisions and their independent, objective and fair judgment.

The Company has adopted and implements the Procedure for Ensuring Independence and Disclosure of Dependent Relationships of the Independent Non-Executive Members of the Board of Directors in accordance with the current legal framework. The purpose of this Procedure is to ensure that the Independent Non-Executive Members of the Board of Directors meet throughout their term the criteria of independence and any dependent relationships of themselves or persons who have close relations with these persons are duly and timely notified to the Company.

The Board of Directors take all the necessary measures to ensure compliance with the above Independence Criteria. The Board of Directors with the support of the Remuneration and Nominations Committee and the Regulatory Compliance Department reviews the fulfilment of the Independence Criteria of the Independent Non-Executive Members at least annually per financial year and before the publication of the annual Financial Report, which includes the relevant verification. In the event that during the audit of the fulfilment of the independence criteria or in case at any time it is ascertained that the independence criteria have ceased to exist in the person of any Independent Non-Executive Member or this Member makes a relevant statement to the Company, the Board of Directors takes the appropriate steps to replace him/her without delay, following a nomination by the Remuneration and Nominations Committee.

Each Independent Non-Executive Board of Directors Member submits to the Remuneration and Nominations Committee annually, an affirmation statement regarding the fulfilment of the criteria of independence by him/her, without however the Company being satisfied exclusively with the submission of the declaration according to the above.

The Board of Directors of the Company, after a thorough examination with the assistance of the Remuneration and Nominations Committee for the fulfilment by the independent non-executive members of the independence conditions defined by article 9 par. 1 and 2, declares and confirms that both during the fiscal year 2023 (01.01.2023-31.12.2023) and on the approval date of the present, the independent non-executive members, and in particular Messrs. Theodoros Kitsos, Georgios Samothrakis, Myrto Papathanou, Spyridoula Maltezou and Nikitas Glykas, fully meet the criteria of independence set by the current legislative and regulatory framework in general.

The following table presents the members of the eleven-member (11-member) Board of Directors in effect:

Member	Position in the board	Date of election/ appointment	Expiry of tenure
Konstantinos Chalioris	Chairman, Executive Member	11.02.2021	11.02.2026
Theodoros Kitsos	Vice Chairman, Independent non-executive member	11.02.2021	11.02.2026
Dimitrios Malamos	Chief Executive Officer, Executive member	11.02.2021	11.02.2026
Vassilios Zairopoulos	Non-executive member	11.02.2021	11.02.2026
Christos Shiatis	Non-executive member	11.02.2021	11.02.2026
Christos-Alexis Komninos	Non-executive member	11.02.2021	11.02.2026
Athanasios Dimiou	Non-executive member	28.07.2021	11.02.2026
Georgios Samothrakis	Independent non-executive member	11.02.2021	11.02.2026
Myrto Papathanou	Independent non-executive member	11.02.2021	11.02.2026
Spyridoula Maltezou	Independent non-executive member	11.02.2021	11.02.2026
Nikitas Glykas	Independent non-executive member	11.02.2021	11.02.2026

All members of the Board of Directors are Greek nationals besides Mr. Christos Shiatis and

Amounts in thousand Euro, unless stated otherwise

Mr. Christos-Alexis Komninos who hold a Cypriot citizenship.

Particularly and in accordance with the above, the Board of Directors of the Company consists of:

- 2/11 (18.18%) executive members
- 4/11 (36.36%) non-executive members
- 5/11 (45.45%) independent, non-executive members
- 2/11 (18.18%) women (fulfilling however the requirements of Article 3, of L.4706/2020, for adequate representation per gender in the Board of Directors).

It is pointed out that the current composition of the Board of Directors is fully harmonized with the requirements, criteria and regulations of the new law 4706/2020 on corporate governance.

Furthermore, the composition of the Board of Directors of the Company fully covers the proper and effective exercise of its duties and responsibilities, reflects the size, organization and type of operation of the Company, achieves adequate staffing of both existing and new Committees instituted to strengthen the supervisory role of the Board of Directors, and is distinguished for the diversity of knowledge, skills, qualifications and experience, elements which can contribute decisively to the promotion and achievement of business goals, plans and the implementation of the Company's business strategy.

Description of the suitability and diversity policy with regard to the administrative bodies of the Company

Given the fact that the Board of Directors is the highest administrative body of the Company, which is responsible for the safeguarding of the general corporate interest, the policy making and the growth strategy of the Company as well as for the strengthening of the long-term economic value of the Company, it is very essential for the particular body to possess, with regard to its composition, a diversity of skills, views and abilities which at the same time respond to the need to effectively attain corporate goals.

The Company has a Suitability Policy for the members of the Board of Directors, which is approved by its Board of Directors and includes at least the provision of diversity criteria for the selection of the members of the Board of Directors. The diversity policy applies both to the members of the Board of Directors as well as to the Executive Directors.

The Suitability Policy, which was approved by the Annual Ordinary General Meeting of Shareholders on May 24, 2023, is posted on the Company's website www.thracegroup.gr, while its scope includes the members of the Board of Directors (executive, non-executive, independent non-executive) as well as the members of the Board Committees.

The Suitability Policy aims to support the Company's interests, ensuring quality staffing, efficient operation, and fulfillment of the role of the Board of Directors, as a collective body.

I. <u>Individual Suitability</u>

Specifically, individual suitability is assessed based on the following criteria:

Guarantees of Ethics and Reputation

- Good Reputation (Reliability and Integrity, Consistency, Personal Weight)

Conflicts of Interest

- Financial interests / incentives
- Personal or professional relationships with members of the Company
- Personal or professional relationships with related external stakeholders (e.g. connection with important suppliers, consultants, etc.)

Availability of sufficient time

- Systematic participation in the Board of Directors and Committees
- Limitation on the number of positions held as members of the Board of Directors of listed companies, with a limit of four (4) outside the Group
- Flexibility and adaptability to attending special meetings
- Preparation and in-depth analysis of topics
- Preparation of propositions and writing presentations on Board of Directors topics

In addition to the above requirements, the criteria for individual suitability also include the following:

Adequacy of knowledge and skills/ abilities

- Teamwork and Collaboration: The ability to collaborate harmoniously, complementary, actively communicating in order to contribute to the Group's goals achievement.

Adequacy of knowledge and skills/ abilities

- Entrepreneurial thinking: Perception of business risks and growth opportunities that could create a competitive advantage for the Group.
- Strategic thinking: Active participation in the formulation of the Group's strategy and monitoring of its implementation as well as the possibility of evaluation and active participation in the approval of strategic plans
- Specialized know-how in specific areas (e.g. Auditing or Accounting for the Audit Committee members, environmental issues, venture capital, and generally pre-selected areas that need to be reviewed on a regular basis).
- Contribution to the sustainability improvement.
- Adoption of the corporate culture and values of the Company.
- Understanding the legal framework and corporate governance issues.
- Ability to recognize and focus on the important factors that lead to the Company's sustainability and prosperity.
- Innovation: The ability to think and see things from a new and innovative perspective, identify and inform about new technologies and market trends oriented to the Group's benefit.
- Flexibility and adaptability: The ability to adapt and work effectively in a changing environment.

Impartiality of judgment

- Objectivity, Courage, courage of dissent, avoidance of "groupthink"

II. <u>Collective Suitability</u>

Regarding the collective suitability, the composition of the active BoD must ensure the effective management and balanced decision-making, with members who have complementary abilities and skills and remain in full compliance with the Company's strategies. There are specific prerequisites, which are diversity, multi-collectivity (representation from different fields of activity and accumulation of a wide range of knowledge and skills), adequate representation by gender as stipulated by respective legislation, representation without exclusion due to any kind of discrimination (e.g. gender, race, religion or belief, etc.), while at the same time, all necessary actions are taken in order Board of Directors members to be able to actively and efficiently participate in strategic planning, identify and manage risks and understand clearly and sufficiently Corporate Governance issues and related legislation, financial reports and technology activities.

From the time of the Company's establishment and until today, the entire members of the Board of Directors fulfill all necessary conditions and have set the foundations in order to be granted with the capacity of the member of the Board of Directors. At the same time, they are distinguished for their high professional skills, outstanding educational level, diverse knowledge, capabilities, extensive experiences, and their organizational and administrative skills, and at the same time they stand out for their integrity and ethical character.

The members of the board of Directors cover a broad range in terms of age effectively combining their dynamics and experience (indicatively between 43 and 81 years old). The members, in their majority, are holders of graduate and postgraduate degrees of domestic as well as of international universities, have worked in high ranked positions of major companies domestically and abroad, meaning companies activating in a variety of business sectors and they have served as Senior Executives of large organizations and as a result they possess significant international experience in the corporate as well as the broader social fields and are in position to actively contribute to the growth prospects of the Group in the geographical areas in which it activates. They finally fulfill the requirements of suitability as well as the criteria with regard to the Group's effective staffing and operation.

The current composition of the Board of Directors aims undoubtedly at the best possible facilitation of corporate goals, as it increases the pool of skills, experience, and vision that the Company has for its highest-ranking personnel, and consequently its competitiveness, productivity and innovation.

The current 11-member Board of Directors of the Company consists of 9 men and 2 women and was elected in the framework of the decision of the Company's Management for immediate, substantial and effective compliance and harmonization with the provisions of the new law 4706/2020 on corporate governance and in particular its provisions which define suitability, diversity and, above all, adequate representation by gender on the Board of Directors. The presence of two women among the members of the Board of Directors covers the statutory percentage (25%) of adequate representation by gender (with rounding to the previous whole number, in case of a fraction, as defined in Article 3, of Law 4706/20).

The Board of Directors

Members	Gender/Age		Education	Nationality		Independence
11 members	9 men	2 women	Specialization	9 Greek	2 Other nationality	45,45% Independent non-executive members
	43 - 81 years					

The Company, in the context of the adoption of the corporate governance best practices provided by the new CCG, ensures the application of the diversity criteria included in the current and approved by the annual Ordinary General Meeting of shareholders on May 24th, 2023, Suitability Policy not only among the members of its Board of Directors, but also to its senior executives.

In particular, the Human Resources Department, which aims to attract and retain the appropriate human resources and continuously increase its efficiency and effectiveness through the implementation of modern procedures, policies and practices of evaluation, recruitment, training and remuneration, ensures faithful and strict application of the diversity criteria to senior management, in order to ensure:

(a) the avoidance of outdated and anachronistic social stereotypes in the process of assessing the specific qualifications and suitability of senior management in general and

(b) the integration of innovative approaches and ideas into the selection process of such executives.

The fundamental criteria of the intended diversity regarding the selection and evaluation of senior executives are as follows:

- adequate gender representation of at least 25%, to the extent, timing and degree to which this criterion is applicable and
- the prohibition of exclusion of a candidate for senior management, due to different gender, race, color, ethnic or social origin, religion or belief, property, birth, disability, age or sexual orientation.

The main criteria for selecting the top executives employed in the Company are the adequacy of knowledge and skills, namely the satisfactory background of theoretical education and training, the appropriate professional experience, the guarantees of ethics and reputation, the integrity and objectivity and the general skills and abilities of the candidate as well as the knowledge of the business model, culture and more specific principles of the Company, in order to form a diverse team of senior executives with a sufficient degree of differentiation, which will be able to take full advantage of market opportunities and effectively manage the risks encountered or potentially faced by the Company during the development of its activities.

The condensed CVs of the Company's Board members are as follows:

Konstantinos Chalioris,
Chairman of the Board of Directors,
Executive Member

He possesses a professional experience of 40 years during which he has developed a strong understanding of the industry and the international market. Since 2009, he holds the position of the Chairman of the Board of Directors. Following the decision of the Board of Directors as of July 28, 2021, the date on which the Board of Directors of the Company was reconstituted, Mr. Chalioris remained Chairman of the Board of Directors of the Company, while by a previous decision of the Board of Directors as of October 14, 2020 he assumed the position of Chief Entrepreneur. The specific position, which was added to the organizational chart of the Group aims to ensure the continuation of the profitable growth of the Group in areas that fall both in the existing activities of the Group and in new beneficial activities in the future. The creation of this position and its assumption by Mr. Chalioris, who has a significant career and valuable experience in "entrepreneurship", will ensure the future development of the Group.

Theodoros Kitsos,
Vice-Chairman of Board of Directors, Independent Non-Executive Board Member

He holds a BSc degree from the Economics Department of the National and Kapodistrian University of Athens and an MBA degree in finance from the Wagner College of USA. He started his career in Unilever Hellas and worked successfully in other companies of the Group located abroad and especially in the United Arab Emirates, Saudi Arabia and the Netherlands. He returned to Greece in 2005 where he worked as General Manager of Human Resources and Organization at PPC (DEI) SA. In a later stage he held the position of Deputy General Manager of Human Resources at Eurobank Group. By the end of the year 2007, he returned to Unilever Group based in London undertaking the duties with regard to the global organizational planning of the Company, whereas in year 2010 he moved to Unilever Russia, Ukraine and Belarus based in Moscow where he held the position of Vice President responsible for issues of human resources and organization, implementing successfully the acquisitions and mergers of three companies active in the production and trading of consumer products. Since the summer of 2015, he worked at the headquarters of Unilever in London having assumed a multitude of responsibilities in the areas of Finance, Law, Technology and Support Services on global level, up until 2020, when he completed his collaboration. Since 2016, he has been a member of the Boards of Directors of various companies in Greece.

Dimitrios Malamos,
Chief Executive Officer, Executive Member

He graduated from the Athens College in 1993. He studied in Great Britain from 1993 to 1998. He holds a BA (Hons) in Business and Financial Economics from Staffordshire University and a postgraduate MBA degree from University of Kent in Canterbury. From 2000 to 2007 he worked in PricewaterhouseCoopers in the area of Management Consulting servicing companies of the private and public sector where he gained significant experience in the fields of budgeting and reporting, financial analysis and internal restructuring. During the period 2007-2009 he worked in National Bank of Greece in the Accounting & Finance division and he returned to PricewaterhouseCoopers in the area of Management Consulting. From June 2010 to March 2020, he worked at Thrace Group as Group CFO. From March 2020, Mr. Malamos assumed the role of Deputy Group CEO, while from October of the same year he holds the position of CEO of the Company and the Group (Group CEO).

Vasileios Zairopoulos,
Non-Executive Member

He began his career in 1983 in the apparel and footwear sector. Soon he assumed the position of Director of Design and Collection for a leading Company in the kids apparel market. His responsibilities were further expanded to include planning and coordinating production. Subsequently, he moved into business development, specifically focusing on expanding a large retail store chain. In addition to these duties, he assumed overall supervision of retail activities, including store planning, ordering and replenishment, management of the internal marketing and sales team, budgeting, and forecasting. Before departing to establish his own consulting firm, he engaged in a wide range of activities, such as strategy, negotiations, marketing management, corporate budgeting, and financial planning. Over the past decade, Mr. Zairopoulos has operated his own consulting firm, providing consultancy services in areas such as strategy, start-up ventures, business planning, investment evaluation and financing, international negotiations, pricing and communication. In addition to domestic companies, Mr. Zairopoulos has collaborated with two American multinational companies, Columbia Sportswear and New Balance. He received an IB Diploma in 1979 from UWC Atlantic College and a BSc in Management from Bath University in 1983.

Christos Shiatis,
Non-Executive Member

He is an Associate Member of the Fellows of Chartered Accountants of England and Wales, a Chartered Public Accountant by the Cyprus Institute of Chartered Accountants and Member of the Hellenic Association of Chartered Accountants (SOEL). He began his professional career in 1981 at the auditing firm Kostouris - Michailidis (Grant Thornton) in Athens. In 1993 he became Managing Partner of the Greek Company and in 1997 he assumed the position of Territory Senior Partner at the Company that resulted from the merger of Kostouris-Michailidis and Coopers & Lybrand. In 1998 he was elected Chairman and Chief Executive Officer of the Company PricewaterhouseCoopers in Greece. Alongside his management duties in the above audit firms, Mr. Shiatis has been active in the field of consulting, providing services to the senior management of large firms.

Athanasios Dimiou,
Non-Executive Member

He graduated from the School of Chemical Engineering of the Aristotle University of Thessaloniki in 1986. From 1989 to 1996 he worked at the companies PLASTIKA MAKEDONIAS SA and AG.PETZETAKIS, initially in the field of Quality Control and the development of new products and then his duties expanded by moving in the position of Technical Director and Director of Technical Services. From 1996 to 1998 he assumed the position of Plant Manager in the shoe manufacturer trading Company MOURIADIS SA, a Company listed on the Athens Exchange and since 1998 he worked as Plant Manager of THRAPLAST SA which mainly produces flexible packaging products made of polyethylene (current Thrace Polyfilms).

In 2000 he started in PLASTIKA THRAKIS SA as a Production Manager at the group’s facilities in Xanthi and in 2004 he took over the duties of Plant Manager in the facilities of Magiko complex in Xanthi, a position he held until 2010. Since then, he has been the Managing Director THRACE NONOWOVENS & GEOSYNTHETICS SA. At the same time, he remains an active member of the Technical Chamber of Greece (TCG), while in the past he was a member of the Hellenic Company of Business Administration and the Institute of Production Management.

Christos-Alexis Komninos,
Non-Executive Member

He was born in Constantinople. In 1971 he graduated from the Polytechnic University of Constantinople (I.T.U.) with a degree in Chemical Engineering (MSc). In 1972 he moved to Greece and was recruited to Coca-Cola TRIA EPSILON, where until 1987 he held several positions. From 1987 to 1990 he served as Chief Executive Officer of Coca-Cola Bottlers Ireland (a subsidiary of TRIA EPSILON). In 1990 he returned to Greece and in 1995 he was appointed Chief Executive Officer, a position he held until 2000. From 2000 to 2004 he was Chairman and Managing Director of PAPASTRATOS SA. After the acquisition of Papastratos by PHILIP MORRIS S.A. he participated voluntarily at the ATHENS 2004 Organizing Committee of the Olympic Games as the Head of the Organization of the Opening and Closing Ceremonies of the 28th Olympiad. From 2005 to February 2010, he held the position of Executive Vice President of SHELMAN S.A. and ELMAR S.A.. From December 2011 until February 2014 Mr. Komninos held the position of Chairman of the Board of Directors of Hellenic Petroleum SA (ELPE). Mr. Komninos also served as Vice President of the Board of Directors and member of the Executive Committee of the Association of Enterprises and Industries (SEV), member of the Board of Directors of Elval Halcor SA of the VIOHALCO Group and a member of the Board of Directors of FINANSBANK (Turkey) and of ANADOLU EFES (Turkey). He speaks English, French, Italian and Turkish.

Georgios Samothrakis,
Independent Non-Executive Board Member

He is a graduate of the Athens University of Economics and Business (ASOEE) and a former Chartered Public Accountant. He specializes in tax issues and tax strategy of Greek and multinational companies, while has been extensively involved in regular and extraordinary audits of commercial and industrial enterprises. He began his career in 1965 at the National Bank of Greece and in 1972 moved to Coopers & Lybrand (now PwC) to set up the Tax Services department where he remained head until 2006. For a number of years, he was also Chairman of the Board of PwC. From 2007 to 2019 he was shareholder and chairman of AS Network, an audit, accounting and tax services group. He has been a consultant of the Supervisory Board of the Body of Chartered Public Accountants (SOEL), where he was a member from 1993 until 2022. He has been actively involved in the formation of the audit - accounting institutional framework in Greece. He has been President of the Fédération des Experts Comptables Méditerranéens, President of the Hellenic Institute of Economic Management (IOD), Member of Committees of the Ministry of Economy and Finance for the implementation of IFRS in Greece, the simplification of the Greek Code of Accounting Books and Records as well as the integration of the new 8th Directive and also a Member of the Corporate Governance Committee of the Hellenic-American

Chamber of Commerce. During the last years he has also been the Chairman of the Company's Audit Committee.

Myrto Papathanou,
Independent Non-Executive Member

She studied Economics at the City University of London and holds a Master's Degree in Economics from the Imperial College Management School in London and an MBA from the INSEAD Business School.

She began her financial career in London, where she worked as a Fixed Income Strategist for Bank of America / Merrill Lynch and as a credit risk analyst for Dresdner Kleinwort Wasserstein.

She was a member of the Board of Directors of Think Silicon SA, while today she is member of the Board of Directors of Ferryhopper SA, Advantis Medical Imaging BV, Better Origin Ltd and Gommyr Power Networks Ltd, which are active in the fields of transport, sports technology, health technologies and renewable energy sources.

Since 2007 she has been working as a business development manager at CPI and since 2011 she has been developing her own business activity in technology as a consultant and investor in other companies. She is the founder of Metavallon VC and has served as Chief Financial Officer and Head of Corporate Development at the EFA Group, which is active in Aerospace & Defense and other high-tech sectors.

She is the first investor from Greece to emerge as Kauffman Fellow (Silicon Valley), a network that selects the best investors in the world. She is on Fortune Greece's list of the 40 entrepreneurs who innovated and excelled for 2020. She received the Leader of the Year award from Linkage Greece in 2016 in recognition of its outstanding leadership ability and contribution to business and society development.

She has also worked in the non-profit space, co-founding Ethelon and seeking funding for the microcredit organization Action Finance Initiative, while as board member of the organization Women-on-top she has developed Microfinance programs in Kenya and Nicaragua for women's empowerment.

Spyridoula Maltezou,
Independent Non-Executive Member

She holds a degree in Chemical Engineering from the Aristotle University of Thessaloniki and a PhD in Environmental Economics from the University of the Aegean.

She is the owner and General Manager of JUSTAIM EE, a Consulting Company in Sustainable Development and Environmental Management. At the same time, she is a Certified Senior Chief Inspector of the International Certification Organization LRQA and an accredited Chief Verifier of CO_2 & GHG emissions data from shipping, a partner of the Lloyd's Register Company, which is a Recognized Shipping Surveyor of International prestige.

She started her professional career in 1999 in the Region of Achaia as head of the department and special advisor on environmental issues. Then, in 2003, she worked at the Ministry of Environment as a Special Environmental Engineer, while she was a founding member of the "Unit for Alternative Management of Packaging Waste and Other Products", acquiring a specialty in Alternative Waste Management. During this period, she was the representative of Greece in EU Legislative Committees on waste management and recycling and member of European and International

Committees on the environment and sustainable development. From 2010 to 2013 she worked as an Environmental Inspector at the Ministry of Infrastructure, Transport and Networks, where she supervised major public road projects throughout Greece in terms of implementing the environmental legal framework. Since February 2016, she has been a Senior Chief Inspector, servicing as auditor of the implementation of management systems, according to the International ISO Certification Organization standards. Since February 2019, she has been working as the Chief Verifier of Shipping CO2 & GHG Emissions Data, in application of the Regulation for the monitoring, reporting and verification of Carbon Dioxide Emissions (MRV Regulation) and the IMO DCS Technical Code, while she is a member of the Professional Accreditation program of the International Water Resources Management Alliance (AWP) of Scotland.

She has extensive experience in sustainability strategy development, establishing objectives, monitoring and continuous improvement, as well as training and raising people's awareness of sustainability principles. She also has in-depth knowledge of environmental policies and regulations, as well as legislation and regulations related to environmental protection.

Her professional dedication and adaptability have contributed to a continuous journey in designing, managing, inspecting, and improving systems of Sustainable Development, Environmental Management, Quality Management, and Health & Safety Management at work, in accordance with international regulations and the strictest standards.

Nikitas Glykas,
Independent Non-Executive Member

He holds a BSc degree in Physics from the University of Athens and postgraduate degrees from the Lancaster University and Harvard University. He started his professional career at MOBIL OIL (1992-1999) and served as Regional Manager for Eastern Europe at MAILLIS SA (1999-2005). From 2006 to 2009, as CEO Member of the Board of Directors of SHELMAN SA, he promoted the restructuring and the broader redesign of the Group's operating procedure, achieving especially positive results amid recession conditions in the timber sector. Since the year 2009 he has held various positions in HTC Group, whereas from October 2015, and assuming higher duties, he holds the position of the Head for the region of Middle East and Africa based in Dubai.

Having held senior management positions in conglomerates, he has extensive international experience and deep knowledge of the European markets as well as the Middle East market. During his career, he led multi-national teams from a variety of countries, achieving outstanding results both in times of economic growth and during economic downturns by redefining the Company's strategy and objectives and leading the companies he worked for to impressive business performance.

Since 2019, he has been serving a Vice Chairman of XR SPACE Co LTD based in Taiwan. In March 2023 he assumed the position of non-executive member of the Audit Committee of PPC (DEI) SA.

The condensed CVs of the top executives of the Company are as follows:

Dimitris Fragkou,
Group Chief Financial Officer (CFO) & Secretary of the Board of Directors of the Company

He studied Business Administration at the Athens University of Economics and Business (AUEB), from which he graduated in 2002. From 2006 to 2008, he studied Accounting and Finance (specializing in Finance), obtaining a Master's Degree from the Athens University of Economics and Business (AUEB). He is also a Certified Public Accountant, as he became a member in 2012 of the Association of Chartered Certified Accountants - ACCA. He started his professional career, for a short period of time from shipping banking, while at the end of 2003 he joined PwC. At PwC, he worked in the Consulting Division, gaining significant experience in the areas of budgeting, financial information, financial analysis, process optimization, transition to new integrated information systems and treasury operations. In 2014, he joined the Department of Business Process Outsourcing, gaining experience in accounting procedures, tax compliance and financial reporting to the Authorities (statutory reporting). He has worked for a number of listed and private companies in the construction, energy, shipping and industrial sectors. From March 2020, he joined Thrace Group as Chief Financial Officer.

Christina Diamanti,
Group Chief People Officer

She studied Business Administration at the Athens University of Economics and Business (AUEB), from which she graduated in 2001 and in 2005 she obtained a Master's degree specializing in Human Resource Management from the Athens University of Economics and Business (AUEB). Since 2000, she worked in the Human Resources departments of a multinational food Company in Greece and the Middle East, and also in commercial offices and production units as well as in the regional offices of Switzerland, where she gained significant experience in the management of human resources practices, organizational structure planning and change management. In her last position, she was responsible for the management of foreign markets, such as the Nordic countries, Spain and Eastern Europe. She has long experience in team building and leadership coaching. As of September 2022 she has joined Thrace Group as Group HR Director.

Ioannis Sideris,
Chief Sustainability Officer

Ioannis Sideris currently holds the position of Group Sustainability Officer at Thrace Group. He has significant experience and active involvement in the fields of sustainable development, climate change, and circular economy since he has served as the CEO of the Hellenic Recycling Agency (EOAN) and the Deputy Mayor of the Environment in the Municipality of Agia Paraskevi. Additionally, he worked as an IT Consultant at the multinational corporation PwC. Throughout his career, he undertook several responsibilities, including serving as the Chairman of the Expert Committee of the General Secretariat of Commerce, a member of the BoD of the Public Real Estate Company and the Association of Sustainable Urban Development. He has also contributed as a researcher at the ELTRUN research center and has extensive experience as a publisher. He is a graduate of the Athens University of Economics and Business with a specialization in Business Administration and holds a master's degree in Information Systems

Development from the London School of Economics.

Lambros Apostolopoulos,
Head of Internal Audit Unit

He is a graduate of Varvakeio High School, a graduate of the Department of Business Administration and Management of the Athens University of Economics and Business (BSc) and holds a Master's Degree in Finance & Business Economics from the University of Portsmouth (MSc). He has worked in large corporate groups in Greece and abroad, while he has many years of experience in internal audit and is a certified Internal Auditor (CIA).

Michail Psarros,
Risk and Compliance Manager

He is a graduate of the Department of Mathematics of the University of Patras and holds a Master's Degree in Finance from the University of Leicester. He also holds professional certifications as Compliance Officer from TUV Austria and Risk Management certification from the National and Kapodistrian University of Athens. He started his professional career, for a short period of time as an Internal Auditor in a Company in the financial sector, while from May 2000 he worked in the Internal Audit Department of the K. Philippou Group of Companies. Then, in November 2005 he moved to the group Lafarge Cement / AGET IRAKLIS, where he worked in the Internal Audit Department until December 2010, when he joined Thrace Group as Group Internal Auditor. During the 21 years of his employment in the Internal Audit Departments in the above industrial groups, he has gained extensive experience in the fields of Internal Audit, internal control systems, risk & compliance management.

From February 2022, Mr. Psarros took over duties as Risk and Compliance Manager.

The following table shows the number of shares held by those who were members of the Board of Directors and seniors executives of the Company during 2023, at 31/12/2023:

BoD members	Number of shares held directly	Percentage of shareholding
Konstantinos Chalioris	18,936,558	43.3%
Theodoros Kitsos	-	0%
Christos-Alexis Komninos	25,000	0.1%
Dimitris Malamos	-	0%
Nikitas Glykas	-	0%
Athanasios Dimiou	-	0%
Vasileios Zairopoulos	164,223	0.4%
Spyridoula Maltezou	-	0%
Myrto Papathanou	-	0%
Georgios Samothrakis	27,000	0.1%
Christos Shiatis	60,000	0.1%

Amounts in thousand Euro, unless stated otherwise

Senior Management & Members of Audit Committee	Number of shares held directly	Percentage of shareholding
Dimitrios Fragkou	-	0%
Christina Diamanti	-	0%
Ioannis Sideris	40,000	0.1%
Lambros Apostolopoulos	-	0%
Michail Psarros	-	0%
Konstantinos Kotsilinis, Member of the Audit Committee	-	0%
Konstantinos Gianniris, Member of the Audit Committee	15,000	0.0%
Sophia Manesi, Member of the Audit Committee	-	0%

In the following table, the professional commitments of the Board of Directors members are presented:

BoD members	Companies in which the BoD members participate	Group Companies in which the BoD members participate	Equity shareholding	Position
Konstantinos Chalioris	Civil non-Profit Company Stavros Chalioris		50%	Vice-Chairman of BoD
	Xanthi Photovoltaic Park S.A.		50%	Chairman & Chief Executive Officer
	EYTERPI S.A.		-	Chairman & Chief Executive Officer
	ERATO S.A		50%	Chairman & Chief Executive Officer
	THALEIA S.A.		50%	Chairman & Chief Executive Officer
	KLEIO TECHNICAL TOURISM COMMERCIA S.A.		-	Chairman & Chief Executive Officer
	EVNIKI MCPY		99%	Legal Representative
	AVDIRA MCPY		99%	Chairman of BoD
	THRACE YAGHTING SMPC		66%	Partner & Administrator
	THRACE LABEA SMPC		50%	Partner
		THRACE NONWOVENS & GEOSYNTHETICS SA		Chairman of BoD
		DON & LOW LTD		Member of BoD
		ARNO LTD		Chairman of BoD
		THRACE PLASTICS PACK SA	4,71%	Chairman of BoD
		SYNTHETIC HOLDINGS LTD		Chairman of BoD
		THRACE SYNTHETIC PACKAGING LTD		Member of BoD
		THRACE GREENHOUSES SA		Chairman of BoD & Managing Director
		TRIERINA TRADING LTD		Director

Amounts in thousand Euro, unless stated otherwise

BoD members	Companies in which the BoD members participate	Group Companies in which the BoD members participate	Equity shareholding	Position
Konstantinos Chalioris		THRACE IPOMA AD		Chairman of BoD
		THRACE POLYBULK AB		Chairman of BoD
		THRACE POLYBULK AS		Chairman of BoD
		LUMITE INC		Member of BoD
		SYNTHETIC TEXTILES LTD		Director
		THRACE POLYFILMS SA		Chairman of BoD
Theodoros Kitsos	AMALTHEA SMPC		35%	Partner
	COLLEGE LINK PRIVATE COMPANY		1%	
	PROVIL S.A.			Member of BoD
	Hellenic Tech Investor Club (THETI CLUB)			Member of BoD
Christos Alexis Komninos	T.K.K. CONSULTANTS LTD		100%	Director
	ELVAL – HALCOR S.A.			Member of BoD
Dimitrios Malamos	DYNAMIC CONSTRUCTIONS – V. ZARIFOPOULOS S.A.		-	Chairman of BoD
	IOANNIS FILIPPAIOS S.A.		-	Member of BoD
	ZITA MCPY		1%	Vice Chairman of BoD
		THRACE GREENHOUSES SA		Member of BoD
		THRACE POLYBULK AS		Member of BoD
		THRACE SYNTHETIC PACKAGING LTD		Member of BoD
		THRACE IPOMA AD		Member of BoD
		THRACE NONWOVENS & GEOSYNTHETICS SA		Vice-Chairman of BoD
		DON & LOW LTD		MEMBER OF BOD
		THRACE PLASTICS PACK SA		Vice-Chairman of BoD
		LUMITE INC		Member of BoD
		THRACE POLYBULK AB		Member of BoD
		THRACE LINQ INC		Chairman of BoD
		THRACE POLYFILMS SA		Vice-Chairman of BoD
		THRACE EUROBENT SA		Member of BoD
		SAEPE LTD		Director
		ADFIRMATE LTD		Director
		PAREEN LTD		Director
Nikitas Glykas	PPC S.A.		-	Member of the Audit Committee
	XRSPACE Co LTD		-	Vice-Chairman of BoD
	LUXURY HOUSES IN ATHENS MARIETTA SMPC		50%	Partner

BoD members	Companies in which the BoD members participate	Group Companies in which the BoD members participate	Equity shareholding	Position
Athanasios Dimiou	AVDIRA MCPY		-	Vice-Chairman of BoD
		THRACE POLYFILMS SA		Member of BoD
		THRACE NONWOVENS & GEOSYNTHETICS SA		Managing Director & Member of BoD
		THRACE EUROBENT SA		Vice-Chairman of BoD
Vasileios Zairopoulos	V. ZAIROPOULOS& SIA LP		90%	Partner & Administrator
	ZITA MCPY		99%	Chairman of BoD
		DON & LOW LTD		Chairman of BoD
		SYNTHETIC HOLDINGS LTD		Director
		SYNTHETIC TEXTILES LTD		Director
		THRACE EUROBENT SA		Member of BoD
Spyridoula Maltezou	JUSTAIM LP		95%	Partner & Administrator
Myrto Papathanou	GOMMYR POWER NETWORKS LTD		30%	Member of BoD
	GOMMYR POWER SMPC		30%	Partner
	BANSARA TRADING LTD		30%	-
	METAFOUNDER UNIT HOLDER SMPC		25%	Partner
	KARYON AGRICULTURE SMPC		22%	Partner
	ENTOMICS BIOSYSTEMS LTD		-	Member of BoD
	FERRYHOPPER SA		-	Member of BoD
	ADVANTIS HOLDING BV		-	Member of BoD
	METAVALLON PARTNERS AEDAKES		25%	Member of BoD
	ACTIVE FINANCE INITIATIVE			Member of BoD
Georgios Samothrakis	FRIGOGLASS SA		-	Chairman of the Audit Committee
Christos Shiatis	AVAX INTERNATIONAL LTD		-	Director
	C.E.T. RIVERS CYPRUS LTD		-	Director
	J&P AVAX SA		-	Member of BoD
	C.P.S. FINANCIAL SOLUTIONS LTD		99%	Director
	TROLID HOLDINGS LTD			Director
	EOTATI REAL ESTATES LTD			Director
		TRIERINA TRADING LTD		Director

It is noted that none of the members of the Board of Directors of the Company participates in the Boards of Directors of more than five (5) listed companies.

Amounts in thousand Euro, unless stated otherwise

Framework for the Management of the Company's Transactions with Related Parties

The Company has adopted and implements a Framework for the Management of its Transactions with Related Parties, which includes the overall policy governing and the process regulating the transactions with Related Parties and which has been approved by a decision of the Board of Directors in compliance with the obligations arising from the applicable legislative and regulatory framework. In addition to the Framework for the Management of its Related Party Transactions, the Company has also adopted a Conflict-of-Interest Management Framework, which is additionally implemented.

The policies that ensure that the Board of Directors has sufficient information to base its decisions regarding transactions between related parties including the transactions of its subsidiaries with related parties are:

A. To define the responsibilities of the Company and the roles of its Divisions in the Management of Transactions with Related Parties

In order to ensure the transparency and proper management of the Company's Transactions with its related parties, the Framework for the Management of the transactions with Related Parties describes the responsibilities of the Company and provides for a clear allocation of roles between its divisions.

Specifically, the Company has undertaken a series of actions related to the management of transactions with Related Parties, as follows:

- submits the Framework for the Management of its Transactions with Related Parties for approval by the Board of Directors,
- ensures the revision of the content of the Framework for the Management of its transactions with Related Party, where required,
- ensures in cooperation with the legal advisors the legality of the individual procedures, applies the criteria mentioned in the Framework for the Management of its transactions with Related Parties and evaluates the affiliation of the transactions with Related Parties for approval by the Board of Directors, taking into account the respective legal framework governing these Transactions,
- takes into account the exceptions mentioned as well as those defined by the respective legislative framework,
- presents the information related to the transactions with Related Parties, pointing out the Company's interest for the financial advantage and the correct application of the conditions for the completion of the transaction, taking into account the respective legal and regulatory framework.

B. Define the Related Parties

As "Related Parties" are defined the related parties listed in IAS 24, as well as the legal entities controlled by those persons in accordance with IAS 27.

C. Locate the Related Parties

For the correct fulfillment of the legal and regulatory obligations of the Company and the effective implementation of the Framework for the Management of its

Transactions with Related Parties, the tracing and identification of the Related Parties with the Company is carried out in the following ways:

- taking into account the organizational chart of the Company and the corporate hierarchy of the Group, as well as the list of investments in other entities, as they apply each time,
- receiving information from the Corporate Secretary of the Board of Directors regarding changes of members of the Board and / or its Committees,
- requesting from the Company's executives, when assigning and performing their duties, to complete and sign a declaration form listing their immediate family members and third parties not affiliated with the Company, in which they hold or in which they exercise control or joint control, as defined in IAS 24. In this context, it is noted that it is the responsibility of each manager to immediately notify the Investor Relations & Corporate Announcements Department in the event of changes to the details of its original statement. The Investor Relations & Corporate Announcements Department updates the declaration forms at a regular basis.

D. *To define the Transactions with Related Parties*

As "Transaction with Related Parties" is defined any transfer of resources, services or liabilities between Related Parties, in which the Company is the one party and its Related Party is the other, regardless of the possible price agreed, and includes any financial transaction, settlement or contract.

Indicatively, and not restrictively, such Transactions may include:

- the transfer of human resources, including their detachment,
- the signing of service contracts,
- signing receivables / debt management contracts,
- the provision of guarantees or insurances.

2) Responsibilities of the Board of Directors

The Board of Directors is the administrative body that decides on any action that concerns the Company's management, the management of its assets and in general anything that refers to promoting and achieving its objective.

According to the Company's Articles of Association:

- The Board of Directors is responsible for the representation, administration and unlimited management of corporate affairs. It decides on any issue that concerns the Company's management, the achievement of the Company objective and the management of Company assets, including the issue of ordinary and convertible bonds. The only exceptions are the decisions which, according to the provisions of Law or the Articles of Association, as in force from the Annual General Meeting of May 24, 2023, are subject explicitly to the responsibility of the General Meeting of shareholders.
- The Board of Directors may appoint, for any time period and under any conditions it deems necessary each time, to exercise its representation and duties in general, fully or partially to one

or more of its members or Managers or Executives or other employees of the Company or third parties or committees, defining however each time their authority and the signatories that bind the Company.

Specifically, the main responsibilities of the Board of Directors (in the sense that the relevant decision making requires the prior approval of the Board of Directors or, if necessary, ex post ratification by the Board of Directors), should include:

- The representation, administration and unlimited management of corporate affairs.
- The decision making for each decision relating to the Company's management.
- The achievement of the corporate objective and management of corporate assets including the issuance of ordinary and convertible bonds. The only exceptions are the decisions which, according to the provisions of the Law or the Articles of Association or any other valid, binding and firm agreement, are explicitly subject to the exclusive responsibility of the General Meeting of Shareholders.
- The approval of the long-term strategy and the operational objectives of the Company and the Group
- The approval of the annual budget and business plan, as well as the decision making on major capital expenditures, acquisitions and divestments.
- The selection and, when necessary, the replacement of the executive management of the Company, as well as the supervision of the plan of the succession.
- The performance testing of the Senior Management and the harmonization of the remuneration of the executives with the long-term interests of the Company and its shareholders.
- Ensuring the reliability of the financial statements and data of the Company, the financial information systems and the data and information disclosed to public, as well as ensuring the sufficient and effective operation of internal control system of the Company.
- The vigilance regarding existing and potential conflicts of interest of the Company, on one side, and the Management, the members of the Board of Directors or the major shareholders on the other side, as well as the appropriate treatment of such conflicts. For this purpose, the Board of Directors has adopted a transactions monitoring process.
- Ensuring the existence of an effective process of regulatory compliance of the Company.
- The responsibility for decision making and monitoring the effectiveness of the Company's Corporate Governance system, including the decision-making processes and the delegation of authorities and duties to other employees.
- The formulation, dissemination and application of the basic values and principles governing the Company's relations with all parties, whose interests are linked to those of the Company.
- The observance of the law, the statute and the legal decisions of the General Assembly. They have to manage the corporate affairs in order to promote the corporate interest, to supervise the execution of the decisions of the

Board of Directors and the General Assembly and to inform the other members of the Board of Directors about the corporate affairs.

- The definition and supervision of the implementation of the corporate governance system of provisions 1 to 24 of Law 4706/2020, the monitoring and evaluation periodically every three (3) financial years for its implementation and effectiveness, taking the appropriate actions for addressing deficiencies.

3) Operation of the Board of Directors

As regards to the operation of the Board of Directors, the Company's Articles of Association and the Internal Operation Rulebook state the following:

Formation of the Board of Directors as a body

- The Board of Directors, as soon as it is elected and specifically during its first meeting, elects from its members and for the entire period of its term, a Vice-Chairman and a Chairman, whereas if the Chairman is absent or unable the Vice-Chairman substitutes such, and if the latter is absent or unable then the Director that is appointed by means of a decision by the Board of Directors substitutes such.
- The Chairman of the Board of Directors presides over the Board meetings, manages its activities and informs the Board of Directors on the Company's operation.
- The Board of Directors may elect one of its members as Chief Executive Officer or Executive Director, it may appoint responsibilities of the CEO to the Chairman or Vice-Chairman of the Board and it may elect the deputy CEO or Executive Director from its members.
- The responsibilities of the CEO are defined by means of a decision by the Board.

Decision Making

- The Board of Directors is considered to be in quorum and meets validly, given that half (1/2) plus one (1) member are present or represented at the meeting. However, the number of members participating in person or represented cannot be less than three (3) in any case. To calculate quorum, possible fractions are omitted.
- The decisions of the Board of Directors are taken by an absolute majority of the present and represented members.

Representation of Board of Directors

A Board member that is absent may be represented by another member. Each Board member may represent only one absent member, with a written authorization.

Minutes of the Board of Directors

- Copies or excerpts of the Board of Directors' Minutes are certified by the Chairman or his/her legal representative or by a member of the Board of Directors that has specifically been authorized by a decision of the Board of Directors.
- The preparation and signing of minutes by all Board members or their representative constitutes a decision by the Board of Directors, even

if a meeting has not previously taken place. This arrangement applies if all the members or their representatives agree to make a majority decision in minutes without a meeting. The relevant minutes are signed by all the members.

- The signatures of the members or their representatives can be exchanged by e-mail or other electronic means.

Remuneration of Board of Directors

- The members of the Board of Directors may receive remuneration for each participation at Board meetings in person or through teleconference, only if such is approved with a special decision by the Ordinary General Meeting.
- The members of the Board of Directors receive the fixed and variable remuneration as well as the other benefits, fees and indemnities specified in the Company's current Remuneration Policy. The fees of the members of the Board of Directors may also consist of a share in the profits of the year, in accordance with the provisions of Law 4548/2018. It is pointed out that by virtue of the decision of the Ordinary General Meeting of the Company's shareholders of May 24, 2023, paragraph 2 of article 15 of the Company's Articles of Association was amended, pursuant to which it was stipulated that the fees of the members of the Board of Directors, senior executives, as they are defined and specified in detail in the approved and applicable Remuneration Policy, general managers and their deputies, as well as administrative executives, in accordance with their definition in International Accounting Standard 24 par. 9, may also consist of a share in the profits, in accordance with the current provisions of Law 4548/2018.
- A fee or benefit granted to a member of the Board of Directors that is not regulated by law or the Statute in effect, shall be borne by the Company only if approved by a special decision of the General Meeting.

Remuneration Report

The Company has established and implements a Remuneration Policy, the purpose of which is to ensure that the members of the Board of Directors and its Committees are remunerated based on its short-term and long-term business plan, in order to achieve profitable organic growth through capacity increase, geographic expansion and value capture as per the Company's strategic plan.

The current Remuneration Policy of the Company was approved by the Annual Ordinary General Meeting of shareholders of May 24, 2023, and its validity period is four (4) years and is available on the Company's website *www.thracegroup.gr*.

The Remuneration Report has been prepared in accordance with the provisions of article 112 of Law 4548/2018, in line with the Guidelines of March 1, 2019, of the European Commission regarding the presentation of the Remuneration Report in accordance with Directive 2007/36/EC, as has been amended by Directive (EU) 2017/828 on Shareholders' rights. It provides an overview of the remuneration model of THRACE PLASTICS CO SA, as it reflects the total remuneration of the members of the Board of Directors, explaining the way in which the Remuneration Policy of the Company was implemented for the financial year 2023.

The total remuneration paid to the members of the Board and Committees during fiscal year 2023 (01.01.2023-31.12.2023) is included in the Remuneration Report, which is available on the Company's website *www.thracegroup.gr* just before the Annual Ordinary General Meeting of shareholders.

4) Board of Directors' Meetings

- The Board of Directors meets at the Company's headquarters whenever the Law or the Company's Articles of Association or its needs require so, convened by the Chairman or his / her deputy with an invitation to be communicated to members at least two (2) working days prior to the meeting. The Board of Directors may also meet outside the Company's registered office, but in this particular case such notice must be communicated to its members at least five (5) working days prior to the meeting.
- The Board of Directors may convene through teleconference for certain of its members or for all of them. In this case, the invitation towards Board members includes all necessary information and technical instructions for their participation in the meeting.
- The Board meetings are presided by the Chairman or upon absence or any other hindrance by his/her substitute according to the Articles of Association.

During the closing financial year 2023 (01.01.2023-31.12.2023), 25 meetings of the Board of Directors took place.

The frequency of participation of the members of the Board of Directors at its meetings in 2023 is as follows:

MEMBER NAME	MEMBER TYPE	FINANCIAL YEAR		PARTICIPATION IN THE BOD MEETINGS	PARTICIPATION PERCENTAGE
		FROM	TO		
Konstantinos Chalioris	Chairman, Executive Member	01/01/2023	31/12/2023	25/25	100%
Theodoros Kitsos	Vice Chairman, Independent non-executive member	01/01/2023	31/12/2023	25/25	100%
Dimitrios Malamos	Chief Executive Officer, Executive member	01/01/2023	31/12/2023	25/25	100%
Vassilios Zairopoulos	Non-executive member	01/01/2023	31/12/2023	25/25	100%
Christos Shiatis	Non-executive member	01/01/2023	31/12/2023	24/25	96%
Christos-Alexis Komninos	Non-executive member	01/01/2023	31/12/2023	25/25	100%
Athanasios Dimiou	Non-executive member	01/01/2023	31/12/2023	25/25	100%
Georgios Samothrakis	Independent non-executive member	01/01/2023	31/12/2023	25/25	100%
Myrto Papathanou	Independent non-executive member	01/01/2023	31/12/2023	25/25	100%
Spyridoula Maltezou	Independent non-executive member	01/01/2023	31/12/2023	25/25	100%
Nikitas Glykas	Independent non-executive member	01/01/2023	31/12/2023	25/25	100%

Amounts in thousand Euro, unless stated otherwise

The topics mainly discussed during the year included:

- Briefing by the Chief Executive Officer on issues related to the external environment of the operating segments, as well as on other important issues related to the Group's activity (such as price increases and price management, impact of energy costs, volume of recycled raw material, existing conflicts that have significantly affected the global economy etc.)
- Presentation of period Financial Results for the Group and its subsidiaries
- Health and safety issues and discussion in order to enhance relevant measures and policies
- Update on current developments in subsidiaries
- Updates to the Board of Directors Committees, Audit Committee and their relevant recommendations.
- Evaluations of Board of Directors / Committees
- Update on important projects of the Company and its subsidiaries
- Evaluation of previous years investments
- Other issues

5) Audit Committee

Fully in compliance with the provisions and stipulations of the effective legislation and in particular with the article 44, effective at the time, of L. 4449/2017, during the Extraordinary General Meeting of shareholders that took place on 11.02.2021, the Company elected a new Audit Committee. Subsequently, the elected Audit Committee was redefined (type, composition, number, status of members and term of office) by the Annual Ordinary General Meeting of May 24, 2023. The Company's Audit Committee under its current composition aims to support the Board of Directors in performing its duties as regards to the procedure of financial information, supervise the operation of the Internal Audit and Risk and Compliance Units, the procedures of internal control systems, the supervision of the mandatory audit of the annual and consolidated financial statements, as well as to inform the Board of Directors regarding the review of the financial reports prior to their approval.

Under the regime of article 44 of law 4449/2017, as in force after its amendment by article 74 of law 4706/2020), and in accordance with the notifications, clarifications and recommendations of the circular with protocol number 1508/17.07.2020 and 427/21.02.2022 documents of the Listed Companies Directorate of the Hellenic Capital Market Commission, the Company is obliged, as a public interest entity, to have an Audit Committee which consists of at least three (3) members and which may comprise:

(a) A Board of Directors Committee consisting of its non-executive members, or

(b) An Independent Committee, consisting of:

   (i) either by non-executive members of the Board of Directors and third parties, or

   (ii) only by third parties.

Third party means any person who is not a member of the Board of Directors.

The members of the Audit Committee are appointed by the Board of Directors, when it is a Committee of the Board or by the

General Meeting of Shareholders, when it is an Independent Committee and must be in their majority independent of the audited entity. This means that in a three-member Audit Committee, at least two of its members (and in any case its Chairman) must either be independent non-executive members of the Board of Directors or, in the case they are third parties, they should meet the requirements of article 9, par. 1 and 2 conditions of independence.

The minimum required number of the present members in order to render a meeting of the Audit Committee as a valid one must be three (3), meaning that in case of a three-member Audit Committee, the presence of all members at each meeting is required.

However, even if the Audit Committee consists of more than three (3) members, it is required, according to the clarifications granted pursuant to the no. 1302/28.04.2017 document of the Listed Companies Division of the Hellenic Capital Market Commission, the participation of the entire number of its members, in person, in the Committee's meetings.

At least one (1) member of the Audit Committee must possess sufficient knowledge and experience in auditing and accounting.

In any case, it is to the discretion of the Audit Committee to invite whenever it is deemed necessary key directors of the Company who are involved in the latter's corporate governance (for example Managing Director, Finance Director, head of the Internal Audit and Risk & Compliance Manager) to attend certain meetings or certain subjects of the daily agenda in order to provide any necessary clarifications.

The Audit Committee, which now operates in accordance with the provisions of Law 4449/2017, as in force after its amendment by Law 4706/2020 has the following duties, while the Board of Directors maintains full responsibility and particularly:

i) External Audit (sect. a' of par. 3) article 44 of Law 4449/2017 (Government Gazette A' 7/24.01.2017)

The Audit Committee monitors the procedure and performance of the mandatory audit on the separate and consolidated financial statements of the Company and the Group. In this context the Committee informs the Board of Directors by submitting a relevant report for issues deriving from the mandatory audit and by explaining analytically the following:

a) the contribution of the mandatory audit to the quality and integrity of the financial information, meaning in the accuracy, completeness and correctness of the publicized financial information including the relevant disclosures which are approved by the Board of Directors,

b) the role of the Audit Committee in the under (a) above mentioned procedure, meaning the recording of the actions taken by the Audit Committee during the performance of the mandatory audit.

In the context of the above information that is being granted to the Board of Directors, the Audit Committee takes into consideration the contents of the supplementary report which the Chartered Auditor-Accountant prepares and submits, and which contains the results of the mandatory audit that was performed fulfilling at least the requirements of article 11 of the Regulation (EU) no. 537/2014 of the European Parliament and the Council of April 16th, 2014.

The Committee:

- Is responsible for the selection and recall process of the Chartered Auditors-Accountants or the Audit Firm and proposes through the Board of Directors to the General Meeting of Shareholders, the Chartered Auditors-Accountants or the Audit Firm to be appointed, the terms of collaboration, as well as their remuneration (according to article 16 of Regulation (EU) No 537/2014, unless par. 8 of article 16 of Regulation (EU) No 537/2014 is being applied).
- Regarding the selection of Chartered Auditors-Accountants or the Audit Firm, it is examined and analyzed:
  - o the scope of work
  - o the audit standard on the basis of which this work will be performed
  - o the form of the deliverable
  - o the responsibilities of the management and the auditor respectively
- It is responsible for monitoring any non-audit service to be provided by the Chartered Auditors-Accountants or the Audit Firm to the Company. Taking into account articles 21, 22, 23, 26 and 27, as well as Article 6 of Regulation (EU) No 537/2014) and in particular the adequacy of the provision of non-audit services to the Company (according to article 5 of Regulation (EU) no. 537/2014) will approve or not the non-audit service.
- Monitors the process and the performance of the mandatory audit of the separate and consolidated financial statements of the Company and especially the performance of the audit, taking into account any findings and conclusions of the competent authority (according to paragraph 6 of article 26 of Regulation (EU) no. 537/2014). In this context, it informs the Board of Directors by submitting a relevant report on the issues that arose from the mandatory audit explaining in detail:
  - (a) the contribution of the statutory audit to the quality and integrity of the financial information, i.e. to the accuracy, completeness and correctness of the financial information, including the relevant disclosures which are approved by the Board of Directors and made public,
  - (b) the role of the Committee in the (a) procedure above, i.e. reporting the actions taken by the Committee during the statutory audit process.
- It is also being informed by the Chartered Auditors-Accountants or the Audit Firm on the annual statutory audit plan before its implementation, evaluates the specific plan and ensures that the annual statutory audit will cover the most important areas of audit, taking into account the main business and financial risk areas of the Company.
- Furthermore, the Committee submits proposals on other important issues, when it deems it appropriate or imposed.

ii) Procedure of financial information (sect. b' of par. 3) article 44 of Law 4449/2017 (Government Gazette A' 7/24.01.2017)

Within this context the Committee:

- Is informed about the process and

schedule of preparation of financial information by the Management and monitors, examines and evaluates the process of preparation of financial information, i.e. the mechanisms and production systems, the flow and dissemination of financial information produced by the involved units of the Company.

- The above actions include other disclosed information in any way (e.g. stock market announcements, press releases, etc.) in relation to financial information.
- Informs the Board of Directors for its findings on essential issues in its areas of responsibility, submits proposals to improve the process, if deemed appropriate, and monitors the response of the Company's Management to these findings.
- Takes into account and examines the most important issues and risks that may have an impact on the Company's financial statements as well as the significant judgments and estimates of Management during their preparation.

Below are indicative issues that are examined and evaluated in detail by the Audit Committee to the extent that they are important for the Company, mentioning specific actions on them during its reporting and briefing to the Board of Directors:

- Evaluate the use of the assumption of ongoing activity.
- Significant judgments, assumptions and estimates in the preparation of the financial statements.
- Evaluation of assets at fair value.
- Evaluation of asset recoverable value.
- Accounting treatment of acquisitions.
- Adequacy of disclosures for the significant risks faced by the Company.
- Significant transactions with related parties.
- Significant extraordinary transactions.

The Committee's communication with the Chartered Auditors-Accountants in view of the preparation of the audit report and the latter's supplementary report to the Committee must be substantial.

In addition, the Committee reviews the financial reports (Annual, Semi-Annual and Quarterly) before their approval by the Board of Directors, in order to assess their completeness and consistency in relation to the information taken into account as well as the accounting principles implemented by the Company and informs the Board of Directors accordingly.

iii) Procedures of internal control and risk management systems and audit control unit (sect. c' of par. 3) article 44 of Law 4449/2017 (Government Gazette A' 7/24.01.2017)

The Committee:

- Monitors, examines and assesses the adequacy and effectiveness of the entire policies, procedures and controls of the Company with regard to the internal control system as well as the quality assurance and the estimation and management of risks in relation to the financial information.
- Monitors the effectiveness of internal control systems mainly through the work of the internal audit and Risk & Compliance Department and the work of the External Auditor.

- Examines the conflicts of interest during the Company's transactions with related parties and submits to the Board of Directors the relevant reports.
- Examines the existence and content of those procedures, according to which the Company's personnel will be able, in confidentiality, to express their concerns about possible illegalities and irregularities in matters of financial information or other issues related to the operation of the Company. The Commission must ensure that procedures are in place to effectively and independently investigate such issues, as well as to address them properly.

Regarding the operation of internal audit unit, the Committee:

- Evaluates the staffing and organizational structure of the Internal Audit Unit and identifies any weaknesses or deficiencies. It also monitors and inspects the proper operation of the Internal Audit Unit in accordance with professional standards as well as the current legal and regulatory framework and evaluates its work, adequacy and effectiveness, without however affecting its independence. If deemed appropriate, the Committee submits proposals to the Board of Directors, so that the Internal Audit Unit has the necessary means, is adequately staffed with personnel with sufficient knowledge, experience and training, there are no restrictions on its work and has the envisaged independence. Therefore, the appointment and dismissal of the head of the Internal Audit Unit is a proposal of the Audit Committee to the Board of Directors. In the same context, the Committee determines and examines the operating regulations of the Company's Internal Audit Unit.
- It is being informed on the annual or periodic audit plan of the Internal Audit Unit before its implementation and evaluates it, accordingly, taking into consideration the main areas of business and financial risks as well as the results of previous audits. The Committee may decide to configure the annual or periodic internal audit plan, as well as to carry out extraordinary audits by the internal audit unit.
- As part of this briefing, the Committee reviews if the annual or periodic audit plan (in conjunction with any corresponding medium-term plans) covers the most important areas of control and systems related to financial information.
- Holds regular meetings with the Internal Auditors to discuss issues of their responsibility, as well as problems arising from the performance of internal audits.
- Takes knowledge of the work of the Internal Audit Unit and its reports (regular and extraordinary) and monitors the briefing of the Board of Directors about their content, in relation to the financial information of the Company.
- Reviews the disclosed information regarding the internal control and the main risks and uncertainties of the Company, in relation to the financial information.

(iv) Regulatory Compliance and Risk Management Unit (articles 13 & 14 of Law 4706/2020 - Government Gazette A' 136/17.07.2020)

The Committee:

- Supervises the management of the main risks and uncertainties of the Company and their periodic revision. In this context, it evaluates the methods used by the Company for the identification and monitoring of risks, the treatment of the main ones through the internal control system and the internal audit unit as well as their proper disclosure in the published financial information.
- Monitor the effectiveness of the regulatory compliance system, including adopting and implementing appropriate and up-to-date procedures, to ensure that the Company fully and constantly complies with the legal and regulatory framework in force in a timely manner and that there is, at all times, a complete picture available of the degree to which this objective is attained.
- Supervise compliance with specific governance practices such as personal data protection, cybersecurity and information security.
- Review the findings from the audits conducted by Regulatory Authorities, external and internal auditors, and the regulatory compliance and risk management unit and monitor the degree to which the Company complies with the applicable requirements.
- Follow up on cases of non-compliance and review the corrective action taken by the Management.
- Informs and is informed from management work together with the Company's legal consultants on compliance issues.
- Examines conflicts of interest during the Company's transactions with related parties and it submits relevant reports to the Board of Directors.
- Look into the existence and content of the procedures followed to allow Company staff to express their concerns confidentially about any potential illegal and irregular practices with regard to financial reporting or other issues which are associated with the Company's operation. The Committee must ensure that the procedures are in place for investigating such issues effectively and independently, as well as addressing them adequately.
- Evaluate regulatory compliance and risk management reports at Company and group level, informs the Board of Directors of its findings and submits proposals where required.

The oversight of the management of key risks and uncertainties, as well as the monitoring of the effectiveness of the Company's regulatory compliance system, is carried out through the supervision of the Risk Management and Regulatory Compliance Unit, for which the Committee:

- Evaluates the staffing and organizational structure of the Unit and detect any weaknesses therein. Moreover, monitors and inspects the proper functioning of the Risk and Compliance Unit according to the professional standards and the legal and regulatory framework in force and assesses its work, adequacy and effectiveness. Where appropriate, makes proposals to the Board of Directors for the Unit to have the necessary means and be adequately staffed with employees who have sufficient knowledge, experience and training etc.
- Evaluates the annual work plan of the Unit before it is implemented taking

into account the key areas of business and financial risk, proposes any additions or changes and finally approves it.

- Receives and evaluates the result of the unit's annual work plan, which is the Annual Compliance Report and then informs the Board of Directors and Committees, about any instances of non-compliance that have been recorded, if any, and the measures being implemented to address potential deficiencies.
- Holds regular meetings with the Risk & Compliance Manager to discuss issues of his/her responsibility.

For the results of all the above actions, the Committee informs the Board of Directors about its findings and submits proposals for the implementation of corrective actions, if deemed appropriate.

The Committee shall have unhindered and full access to the information, records and data required in the exercise of its powers and shall have the necessary resources to carry out its work in a proper and effective manner, including the use of external consultants.

The Audit Committee archives all the necessary information, including the minutes of its meetings, in which its actions and their results are recorded, regarding the implementation of its work.

The Audit Committee submits reports to the Board of Directors on its areas of responsibility and also in the areas which, after the completion of its work, it considers that there are essential issues in relation to the provided financial information and monitors the Management's response to them.

The Chairman of the Committee provides information to the shareholders during the annual General Meeting about the Committee's activities on the basis of the above-mentioned responsibilities, through the submission of a relevant Report.

For the implementation of all the above, the Audit Committee is expected to hold meetings with the Management and the competent executives during the preparation of the financial reports, as well as with the Chartered Auditors-Accountants or the Auditing Company during the planning phase of the audit, during the execution and also during the phase of preparation of audit reports

The existing Audit Committee, which was elected by the Extraordinary General Meeting of Shareholders on 11 February 2021, as it was redefined following the resignation of the member of the Audit Committee, Mr. Konstantinos Gianniris, and his replacement by Ms. Sophia Manesi, is an Independent Committee and is consisted of the following one (1) Independent Non-Executive Member of the Company's Board of Directors and two (2) non-members-third parties, namely:

Georgios Samothrakis	Independent Non-Executive Board Member
Konstantinos Kotsilinis	Non-Board Member – third party
Konstantinos Gianniris	Non-Board Member – third party
Sophia Manesi[1]	Non-Board Member – third party

1: Commencement of term: May 24, 2023

Following the replacement of the aforementioned resigned member of the Audit Committee by the Extraordinary General Meeting of shareholders of 24 May 2023 and the appointment of Ms. Sophia Manesi as his replacement for the remainder of the term, the Audit Committee, during its meeting on May 25, 2023, was constituted, with the term ending on February 11, 2026, as follows:

Georgios Samothrakis	Chairman of Audit Committee
Konstantinos Kotsilinis	Member of Audit Committee
Sophia Manesi	Member of Audit Committee

For reasons of completeness, CVs of the members of the current Audit Committee are presented as follows:

- **Georgios Samothrakis**

The CV of Mr. Georgios Samothrakis, Member of the Board of Directors, is presented in detail in Section VI.1 “Composition of the Board of Directors” of the current Report.

- **Konstantinos Kotsilinis**

Mr. Konstantinos Kotsilinis was born in New Zealand, studied at Victoria University of Wellington and earned a Bachelor of Commerce and Administration degree. He began his professional career in 1968 at Coopers & Lybrand in Wellington, then transferred to the London office in 1972 and later that year to the Greek office. From 1978 to 2003 he was head of the audit department of Coopers & Lybrand / PwC Greece. In his last years of service in the Company, he served as the Chairman of the Board of Directors of the Company. He has also served on various Committees, including the Supervisory Board of the European Financial Reporting Advisory Group (2002-2004) and the Accounting Harmonization Committee of UNICE (2002-2005). From 2009 to 2014, he was Vice Chairman of the Accounting Standardization and Auditing Committee of Greece (ELTE) and Chairman of the Quality Control Council (SPE). During this period he represented Greece in the relevant committees in the European Union and during the Greek Presidency he was the Chairman of the committee responsible for audit issues. He is a former Chartered Auditor-Accountant as well as a former Member of the Institute of Chartered Accountants of New Zealand. He is the Chairman (since 2006) of the Board of Directors and a member of the Audit Committee of the insurance Company Interasco A.E.G.A. From 2006 until today he is an External Advisor of the Audit Committee of the National Bank of Greece, while since 2017 until 2021 was a Member of the Audit Committee of Mytilineos SA. From 2023 he is a member of the Audit Committee of FRIGOGLASS SAIC. Since 2004 he is a Member of the Board of Directors of “Child’s Smile” and today Vice President of the Organization. From 1991 to 2020 he was the Honorary Consul General of New Zealand in Greece, while he has been appointed Member (MNZM) and Officer (ONZM) of the Order of Merit of New Zealand by the Queen of England.

- **Sophia Manesi**

Amounts in thousand Euro, unless stated otherwise

Mrs. Manesi has twenty years of experience in Internal Audit having held senior positions at PwC, the former bank Geniki, BNP Paribas Greece and the Hellenic Financial Stability Fund. Her main areas of expertise are the establishment and smooth operation of Internal Control Unit in accordance with the International Standards for the Professional Implementation of Internal Control of the IIA, the risk assessment, the evaluation of the Internal Control System and the implementation of the best practices of Corporate Governance.

At BNP Paribas Greece and the Hellenic Financial Stability Fund, as Director of Internal Audit, she was responsible for the development and implementation of operational internal audit procedures and risk assessment, which contributed to increasing the efficiency of the units' operation and the achievement of specific objectives that had been set by the respective Administration.

Since 2020, she has been a regular lecturer in the Integrated Basic Training Program for Internal Auditors of the IIA and also participates as a speaker in events that promote knowledge and awareness in matters related to Corporate Governance and the Internal Audit System.

She has a bachelor's and master's degree in Business Administration as well as a degree in Psychology. She holds the Certified Internal Auditor (CIA), Certified Fraud Examiner (CFE), COSO Internal Control Certificate and is a certified evaluator of internal control units. She knows English and German.

From the above it is inferred that the members of the Audit Committee have proven in their entirety that they possess sufficient knowledge in the field in which the Company operates, given that:

(a) Mr. George Samothrakis was already a member of the Audit Committee of the Company, elected by the Extraordinary General Meeting of Shareholders as of March 19, 2019,

(b) Mrs. Sofia Manesi, although she has never participated in the Board of Directors of the Company, has many years of professional experience, academic and technical training, factors that make her the most suitable replacement for the resigned member.

(c) Mr. Konstantinos Kotsilinis, who has never participated in the Board of Directors of the Company, knows very well and due to his wider professional activity the environment and the conditions in which the Company develops its business activities.

The criterion of sufficient knowledge and experience in auditing or accounting is proven to be met in the capacities of both Mr. Georgios Samothrakis and Mr. Konstantinos Kotsilinis, who are both former Chartered Auditors-Accountants with extensive knowledge and rich professional experience. This is turn will contribute decisively and substantially in further strengthening the efficiency of the Audit Committee and in the implementation of its responsibilities in the best possible way, in order to strengthen the dynamics and the value of the Company. Furthermore, Ms. Sophia Manesi, possessing many years of experience in Internal Auditing, can make a substantial contribution to the Audit Committee so that the latter can carry out its work in the most effective manner and be able to provide substantial solutions and guidance facilitating at the same time the economic growth of the Company and the fulfilment of its legal obligations.

Finally, those conditions and criteria of independence which are covered by the current regulatory framework and in particular by article 9 par. 1 and 2 of law 4706/2020, are met for all members of the Audit Committee, given that the following persons:

(a) do not hold shares greater than 0.5% of the Company's share capital; and

(b) do not have any dependency relationship with the Company or persons related to the Company, according to the manner by which this dependency relationship is specified in particular in the provisions of the above legislation.

Frequency of Meetings and Main Topics of Meetings' Agenda

The Committee convenes at least four (4) times a year. The Chairman of the Committee decides on the frequency and time schedule of the meetings. The external auditors are entitled to request a meeting by the Committee if they deem appropriate or necessary.

During 2023, the Committee convened sixteen (16) times and all members were presented during the meetings, whereas all issues mentioned in the Internal Operation Rulebook as well as in the Operations Rulebook of the Audit Committee were discussed and handled, the major of which are as follows:

1. Supervision and approval of the Internal Audit and Risk & Compliance Unit's activities and briefing of the Board of Directors about the issues arising from both Units activities.
2. Confirmation of the exclusive employment, personal and functional independence and objectivity in the exercise of the duties of the head of the Internal Audit Unit, as well as the possession of the appropriate knowledge, professional experience and the absence of any non-comformity.
3. Monitoring the process and conducting the assessment of the Company's Internal Control System audit including its significant subsidiaries and informing the Board of Directors about the issues arising from the conduct of this specific audit.
4. Monitoring the process and the performance of the Company's Corporate Governance System and drafting up a relevant proposal to the Board of Directors for its implementation by the Secretary of the Board of Directors with the assistance of the Regulatory Compliance & Risk Management Unit and the Audit Committee.
5. Monitoring of the process and the performance of the Enterprise Risk Assessment Project of the Company and its subsidiaries and informing the Board of Directors about the issues arising from this risk assessment.
6. Providing an opinion on the selection of the Auditing Company for the performance of the mandatory audit on the separate and consolidated financial statements of the Company for the fiscal year 2023.
7. Monitoring of the financial information process, overview of the annual Financial Report, the annual Financial Statements and the semi-annual and quarterly (interim) Financial Statements (stand-alone and consolidated) and drafting up a relevant proposal to the Board of Directors for their approval.
8. Monitoring of the process and the performance of the mandatory audit on the separate and consolidated financial statements and informing of the Board of Directors about the issues related to the mandatory audit.
9. Ensuring the independence, integrity, impartiality and objectivity of the Chartered Auditors-Accountants.
10. Examination of all the services provided by the Auditing Company, evaluation of their performance and confirmation that no non-permissible services have been provided, except

those required in the context of accounting and tax audits.

11. Implementation of an RFI process for the selection of a new audit Company, as requested by the article 42 of Law 4449/2017 due to the mandatory rotation of the current External Auditors in 2024 and drafting a proposal to the Board of Directors for the selection of these.
12. Approval of the content of the information provided to the Company's shareholders during the Annual Regular General Meeting regarding the activities of the year 2022.

6) Remuneration and Nominations Committee of Board of Directors Members, Committees and Senior Management

The Board of Directors of the Company for the purpose of substantial, effective and appropriate compliance and harmonization of the Company with the regulations of articles 11 and 12 of Law 4706/2020 (Government Gazette A136/17.07.20201) and with the parallel adoption of the corporate governance best practices, during its meeting of 22.03.2021 decided the abolition of the existing Committee for Benefits and Promotion of Nominations (CBPN) and its replacement by the Remuneration and Nominations Committee.

The Committee consists of three (3) Non-Executive Board of Directors Members, while the majority of its members are Independent, in order to ensure the objectivity, independence and integrity of their judgment. The Board of Directors is responsible for the appointment and replacement of all members of the Committee. The Committee elects its Chairman, who is an Independent Non-Executive Member and is supported by the Secretary of the Committee. The term of office of the members of the Committee is directly related to that of the Board of Directors. In addition, the Committee submits an annual progress report regarding the actions took place to the Board of Directors.

The Committee consists of the following Non-Executive Members of the Board, namely:

Theodoros Kitsos	Independent Non-Executive Member of the BoD, Chairman of the Committee
Nikitas Glykas	Independent Non-Executive Member of the BoD, Member of the Committee
Vasileios Zairopoulos	Non-Executive Member of the BoD, Member of the Committee

The term of the above Committee expires on February 11th, 2026.

Amounts in thousand Euro, unless stated otherwise

The purpose of this Committee includes at a minimum the development and formation of all types of remuneration of executives falling within the scope of application of the Remuneration Policy provided by Article 110 of Law 4548/2018, the identification and retain of the necessary executives within the headcount of the Company, who will support the Company's long-term success, manage the process of nominating and succession planning for the Board of Directors, Committees, and senior management, in line with business objectives, competitive practices, and all applicable rules and regulations of the Company and current legislation. They will also formulate and submit relevant proposals and recommendations on these matters to the Board of Directors.

The operation of this Committee ensures that both the remuneration of the Executive and Non-Executive members of the Board of Directors and the members of its Committees as well as the nominations for Board of Directors members will be in line with the corporate objectives and market practices and, in any case, will be in full compliance with the current legal and regulatory framework.

In terms of setting remuneration policy, the Committee's responsibilities includes the following:

- The Committee examines, pre-approves and makes recommendations to the Board of Directors annually regarding labor issues included in the employment contracts of Executive Board of Directors members and the compliance with the internal Rule of Procedure.
- The Committee is responsible to determine the remuneration scheme of the Board of Directors, it's Committee members and Top Management Executives and makes recommendations on the subject to the Board of Directors which decides or makes a suggestion to the General Meeting, as required.
- The Committee reviews, pre-approves and proposes annually (or whenever deemed necessary) to the Board of Directors, the base salary, the variable remuneration and benefits provided (where available) for the Board of Directors Executive and Non-Executive members, the Board of Directors Committees members, and the Top Management Executives of the Company, including the Head of Internal Audit and the Head of Risk & Compliance, taking into consideration the macroeconomic conditions and the remuneration level of respective companies.
- Specifically for the Executive members of the Board of Directors and based on the approved (from the Board of Directors) Strategic Plan, the Committee ensures the existence of approved annual significant objectives (maximum of 3) and ensures their proper reflection. After the end of the relevant period, it examines, pre-approves, and recommends to the Board of Directors the amount of variable remuneration, based on the achievement of corporate goals.
- The Committee reviews, when required, the Remuneration Policy, including the submission of proposals for improvement or differentiation, and examines the data included in the final draft of the annual remuneration report, providing its opinion to the Board of Directors, before submitting the report to the General Meeting, in accordance with the law.
- The Committee undertakes and cooperates with the other committees of the Board of Directors, in order to review the non-salary contractual obligations for Executive and Non-Executive Board of Directors members/ Committee members.
- If the Committee becomes aware of a review of the financial statements of previous years or finds incorrect, inaccurate or incomplete information that has an impact on the variable remuneration, it is obliged to inform the Management in order to require the readjustment and/or return of all or part of the variable remuneration that has been granted.

- The Committee conducts or authorizes third parties to conduct research or studies on matters falling within its remit.

In the responsibilities of the Committee regarding the promotion of the nominees for the Board of Directors and Committees members, includes the following:

- The Committee defines and proposes to the Board of Directors the criteria for the election of members of the Board of Directors and its Committees, in accordance with the requirements of the law and the respective strategy / Suitability Policy of the Company.
- The Committee is responsible for the preparation of the Nomination process for members of the Board of Directors / Committees, based on predefined criteria and in accordance with the eligibility and corporate governance policies.
- The Commission evaluates candidates of the Board of Directors and Board of Directors Committees through interviews and references.
- The Committee proposes the selected candidates for approval to the Board of Directors and General Meeting as required.
- The Committee determines the evaluation criteria of Board of Directors and its Committees on matters such as size, composition, existing balance of qualifications, gender, knowledge, experience, skills, and overall effectiveness of the Board of Directors. The Committee is also responsible for the annual performance evaluation of the members of the Board of Directors/ Committees according to the criteria of the Suitability Policy. Based on evaluation results, the Committee prepares and recommends to the Board of Directors the annual Board Adequacy Report which is submitted to the General Meeting.
- The Committee determine the parameters of the succession planning of the Board of Directors and its Committees and supervise it.
- The Committee determines the evaluation criteria, supervises the annual individual evaluations of the Executive Board of Directors members, and suggests to the Board of Directors proposals for their personal and professional development, to ensure that the Company remains competent and competitive in the long term.
- The committee advises the Chief Executive Officer in the process of nominating candidates for senior executive positions of the Company, as well as in creating their succession plan. The final decision to fill the above positions belongs exclusively to the Chief Executive Officer.
- The Committee conducts or authorizes third parties to conduct investigations or studies on matters falling within its area of responsibility.

The Committee for Remuneration and Nominations for Board of Directors Members , Committees and Senior Management convened nine (9) times during the year 2023 (01-01.2023-31.12.2023) <u>in the presence of all its members.</u> The topics that were mainly discussed were:

- The evaluation of the management's proposal for the 2023 remuneration of the Top Executives and the approval for 2022 bonus,
- The approval of the allocation of the 2023 Bonus through Profit Distribution,

- The term of Board of Directors Members and Committees,
- The confirmation regarding the non-issuance of a final court decision for loss-making transactions (article 3, paragraph 4) of Law 4706/2020 for all the members of the Board of Directors and compliance with the Independence criteria of the Independent non-Executive members of the Board of Directors,
- The examination of the individual suitability criteria and independence criteria of the new member of the Audit Committee, Ms. Sophia Manesi, and fulfillment of suitability and independence criteria requirements of the existing members of the Audit Committee (AC) elected by the General Meeting of Shareholders on May 24, 2023,
- The confirmation regarding the non-existence of cases of conflict of interests of the members of the Board of Directors,
- The determination of specific performance criteria for the short-term incentive program for the year 2023 for the Executive Board of Directors Members & Executive Management involved,
- The verification of the participation of Board of Directors Members in Boards/Committees outside the Group,
- The definition of a succession plan for the members of the Board of Directors and Committees,
- The drafting of the Succession Policy,
- The drafting the Competency Report for the Board of Directors,
- The revision of the Remuneration and the Suitability Policy of the members of the Board of Directors and Committees,
- The preparation of the Remuneration Report,
- The finalization of the evaluation of the Board of Directors Members and Committees suitability, the remuneration review of the of the Board of Directors Members and Committees, a task performed after its issuance by a reputable consulting firm,
- The examination of the fulfillment of the individual suitability and independence criteria in the person of the candidate for the new member of the Audit Committee, Mr. Sophia Manesi,
- The annual review of the Committee's Operating Regulations,
- The update and receipt of feedback regarding the skills model and
- The insurance of the existence of induction programs for new members of the Board of Directors.

7) Other Committees

Furthermore, the Board of Directors of the Company at its meeting of March 22, 2021, in order to optimally organize and operate the most efficient framework of corporate governance, decided the establishment of new Committees as follows:

- Strategy and Investment Committee,
- Environmental, Social and Corporate Governance [ESG] Committee and
- Human Resources Committee.

Following its decision of 22.3.2021, the Company's Board of Directors new meeting that took place on 24.03.2022 decided:

- The modification in the responsibilities of the Environmental, Social and Corporate Governance (ESG) Committee, as the responsibilities related to regulatory compliance were assigned to the Audit Committee and consequently it was decided to rename the Committee to Sustainability Committee.
- To change the organizational position of the Human Resources Committee and put it to report directly to the Group CEO, in order to ensure the most effective support and its contribution to its daily work.

As a result of the above decisions and changes, the other Committees of the Company's Board of Directors have been formed as follows:

Strategy and Investment Committee

The purpose of this specific Committee primarily consists of providing assistance to the Board of Directors with regard to the development of the operational strategy, the formulation of the investment plan of the Company and of the Group in general, as well as supervising and providing guidance to the Board of Directors during the implementation of the business strategy that has been formulated, as well as the provision of support in the formulation of revised / updated plans and in the monitoring and control of the implementation and performance of the strategic investments of the Company and the Group.

The framework of responsibilities of the Committee includes:

- Develops and proposes to the Board of Directors the long-term strategy of the Group and suggests the necessary adjustments in the short and medium term.
- Studies and pre-approves the strategic plans of the companies, ensures that they are in line with the Group's strategy and makes recommendations to the Board of Directors.
- Reviews and suggests to the Board of Directors for the investment plans and the individual investments of the companies.
- Reviews possible acquisitions, mergers, divestments and Joint Ventures and makes proposals to the Board of Directors respectively.
- Monitors the progress and results of all actions related to the implementation of the strategy and the progress of investment plans and informs the Board of Directors accordingly.
- Monitors closely international trends, best practices, and market data, in order to adapt the strategy of the Group and the Companies and informs the respectively the Board of Directors.
- Recognizes timely risks and opportunities and prepares proposals to the Board of Directors for the necessary actions, including the framework that ensures their funding.
- Discusses the communication of the Management to third parties and the investor community, in terms of the strategy and the investment plan of the Group.

The Strategy and Investment Committee consists of three (3) members of the Board of Directors, as follows:

Konstantinos Chalioris	Executive Member of the BoD, Chairman of the Committee
Dimitrios Malamos	Executive Member of the BoD, Member of the Committee
Vasileios Zairopoulos	Non-Executive Member of the BoD, Member of the Committee

The Committee convened 21 times during the fiscal year 2023 in the presence of all its members.

The topics that were mainly discussed concern the strategies of the subsidiaries, the budgets of subsidiaries and the Group and the study of new investments.

Sustainability Committee

Purpose

The purpose of this Committee is to review, pre-approve and recommend to the Board of Directors environmental and social sustainability issues through strategy development, issue management and performance monitoring.

The framework of responsibilities of the Committee includes:

- Examines that Sustainable Development policies, strategies and objectives are fully aligned with both the Company's vision and values, as well as laws and the general regulatory framework, to ensure full compliance, thus ensuring long-term sustainable performance.
- Monitors closely the development and implementation of the Sustainable Development goals that have been set, based on the materiality analysis, which includes the important, relevant and critical areas that the Company highlights as priorities and proposes improvements to the Management and then to the Board of Directors, where necessary.
- Monitors the progress and results of all Sustainable Development issues with the aim of regularly informing the Board of Directors.
- Closely monitors international trends and best practices in order to regularly update the Board.
- Recognizes timely risks and opportunities and prepares proposals to the Board of Directors for the necessary actions, including the framework that ensures the financing of the Company.
- Studies and pre-approves the annual statements and Sustainability reports, including Non-Financial Reporting as well as other disclosures, submitting relevant proposals to the Board of Directors.
- Acts on behalf of the Board of Directors and cooperates with the Management of the Company ensuring the prestige and reputation of the Company in relation to all issues of Sustainable Development and its Public Image.

Operational Framework

Environment: The impact of the Company's footprint to land, air, water, climate through the use of raw materials, end products design, technology, manufacturing units, transport etc.

Society: the impacts of the Company's policies and strategy in relation to: (1) Lifelong learning and development of employees, (2) Improvement of employee well-being including health and safety,

(3) Ensuring employee living standards, (4) Corporate culture, philosophy, and related commitments regarding diversity, inclusion criteria, (5) Child/forced labor, (6) the respect for human rights, (7) Support for local communities, (8) Workplace environmental conditions, (9) Product safety during production and use, etc.

The Sustainability Committee consists of four (4) members of the Board of Directors, as follows:

Theodoros Kitsos	Independent Non-Executive Member of the BoD, Chairman of the Committee
Konstantinos Chalioris	Executive Member of the BoD, Member of the Committee
Dimitrios Malamos	Executive Member of the BoD, Member of the Committee
Spyridoula Maltezou	Independent Non-Executive Member of the BoD, Member of the Committee

The Committee convened 4 times during the fiscal year 2023 in the presence of the majority of its members.

The topics that were mainly discussed concern:

- Discussion and information about the external environment in matters of sustainable development.
- Update on the project to support sustainable development issues.
- Discussion and comments on the draft Non-Financial Information Report.
- Update on the European Taxonomy.
- Discussion on defining indicators.
- Update on materiality analysis.
- Discussion and comments on the draft Supplier Assessment Process.
- Discussion and comments on the draft Sustainability Report.
- Discussion on Directive (EU) 2022/2464 Corporate Sustainability Reporting Directive.
- Discussion and comments on the draft questionnaire for CDP assessment.
- Discussion and comments on the draft Environmental Policy.

It is pointed out that all the above Committees of the Board of Directors have drafted - composed their Rulebooks.

8) Evaluation of Board of Directors and Committees

The Company implements an Evaluation Policy of the Board of Directors and Committees. The scope of the Policy includes the executive, non-executive, independent non-executive members of the Board of Directors of the Company, as well as the non-members of the Board of Directors (third parties) who are members of its Committees.

The criteria of suitability and reliability of the Board of Directors members are defined in law 4706/2020, the decisions issued under its authority, as well as the Suitability Policy of the Company, which has been approved and implemented by the Company. The Company Suitability Policy is posted on the Company's website www.thracegroup.gr.

Procedure for Periodic Evaluation of Board of Directors Members

Individuals falling within the scope of the Suitability Policy are continuously evaluated based on their ability to effectively, consistently, and efficiently fulfill their duties and ensure the interests of the Company and other stakeholders, in order to achieve prudent and sound management of the Company by fit and proper individuals.

The members of the Board of Directors and its Committees are evaluated:

- On a collective basis, which takes into account the overall operation of the Board of Directors and its Committees and
- On an individual basis regarding the assessment of each member contribution to the successful operation of the Board of Directors.

The periodic evaluation of the Board of Directors members and its Committees is held on an annual basis within the first quarter of each year, unless otherwise decided by the Remuneration & Nomination Committee and concerns the period of 12 months of the previous year.

Self-evaluation of the overall performance of the Board of Directors and its Committees

The self-evaluation of the overall performance of the Board of Directors and its Committees is carried out taking into account the purposes, responsibilities, their operation based on the Articles of Association, the Regulations and the legislative and regulatory framework. Also, during the overall evaluation, the composition, the diversity, and the effective cooperation of the members of the Board of Directors for the fulfillment of their duties are taken into account. It is conducted on the basis of questionnaires which are approved by the Remuneration & Nomination Committee and are completed by the members of the Board of Directors and the Committees. Members should answer all the questions on the questionnaires.

The Remuneration & Nomination Committee decides on the initiation of the self-evaluation process and decides whether it is deemed appropriate for the annual evaluation to be carried out internally or with the assistance of an independent external consultant.

Individual Evaluation of Board of Directors Members and its Committees

The individual evaluation of the members of the Board of Directors concerns the performance of each member on an individual basis and the assessment of his/her contribution to the effective operation and overall performance of the Board of Directors.

Each member of the Board of Directors is evaluated by the Chairman or the Vice-Chairman and all the other members of the Board of Directors, regarding the fulfillment of the role and the more specific tasks assigned to him/her, as defined in the Rulebook of the Board of Directors and its Committees, in the Internal Regulations of the Company, in the Corporate Governance Code as well as in law 4706/2020.

During the individual evaluation, the status of the member is taken into account (executive, non-executive, independent non-executive), the participation in special Committees, the assumption of special responsibilities / projects, the time dedicated during the fulfillment of his / her duties, the behavior as well as the utilization of theoretical knowledge and professional experience possessed.

The evaluation is carried out on the basis of questionnaires that are completed for each member, while in addition, in the context of the individual evaluation, the Chairman or Vice-Chairman may meet individually with the members, if this is deemed appropriate or necessary.

In case a low score is identified or there are suggestions for improvement for specific members, the Chairman and/or the Vice Chairman of the Board of Directors are informed so as to consider the possibility of an individual meeting of the Chairman and / or the Vice-Chairman with the member of the Board of Directors for their update, the discussion of the individual points that have been recorded and the definition of the actions that are deemed appropriate to follow. Regarding the evaluation of the Chairman, a corresponding update is made, if necessary, to the Chairman of the Remuneration & Nomination Committee. During the relevant briefing of the Chairman of the Board of Directors, the anonymity of the members who made the evaluation is ensured and in no case are their details disclosed to the Chairman of the Board or to the Remuneration & Nomination Committee.

Based on the evaluation of the Board of Directors members and its Committees, as described above, with reference period the closing fiscal year 2023 (01.01.2023-31.12.2023), no significant weaknesses were identified. Therefore, the Board of Directors decided not to prescribe any corrective actions.

VII. General Meeting and Shareholders' Rights

1. Authorities of General Meeting

- The General Meeting of the Company's shareholders is the highest corporate body and is entitled to decide on any issue that concerns the Company, while its decisions also bind shareholders that are not present or who disagree.
- Issues regarding invitation, convening and conducting General Meetings of shareholders, that are not particularly defined by the Company's current Articles of Association are governed by the relevant provisions of articles 116-140 of Law 4548/2018, as currently in effect.

2. Convening the General Meeting

The General Meeting convenes at the Company's registered offices or in a district of another municipality within the prefecture of its domicile or another municipality near the domicile. The General Meeting may also convene in the district of the municipality, where the domicile of the relevant organized market is located.

Remote participation in the voting at the General Meeting of shareholders is allowed, using audiovisual/electronic or other means, by postal vote, with the shareholder's prior dispatch of the agenda items of the General Meeting and relevant ballot papers or postal voting forms at least five (5) days prior to the General Meeting. The agenda items, ballot papers, and postal voting forms may also be made available, and their completion may also be done electronically via the internet. Shareholders voting in this manner are counted towards the quorum and majority, provided that the relevant ballot papers and postal voting forms have been received by the Company at least one (1) full day before the day of the General Meeting.

In this case, the Company shall take adequate measures to:

(a) be able to ensure the identity of the participant, the participation of persons who are entitled to participate in or attend the General Meeting and the security of the electronic connection,

(b) enable the participant to monitor the proceedings of the Meeting by electronic or audiovisual means and to address the Meeting, verbally or in writing during the meeting, and to vote on the items on the agenda and

(c) ensure the ability to record accurately the participant's remote voting.

The members of the Board of Directors, the Chairman of Audit Committee, as well as the Chartered Auditors-Accountants of the Company are entitled to attend the General Meeting. The head of the Internal Audit Unit must attend the General Meetings of shareholders. The Chairman of the General Meeting may, under his/her responsibility, allow the presence of other persons who do not have shareholder status or are not shareholders' representatives, to the extent this is not contrary to the Company's interest. These persons are not considered to be members of the General Meeting for the sole reason that they have spoken on behalf of a present shareholder or upon the invitation of the Chairman.

3. Representation of shareholders at the General Meeting

Shareholders that have the right to participate in the General Meeting may be represented in such by legally authorized proxies.

4. Chairman of the General Meeting

The Chairman of the Board of Directors temporarily presides over the General Meeting. In case the Chairman is unable to attend, the Deputy Chairman, as specified in Article 9 of the Articles of Association, or if both are unable to attend, the oldest attending director assumes the role. The duties of the Secretary are temporarily performed by those appointed by the Chairman.

Following the reading of the final list of shareholders that have voting rights, the Meeting proceeds with electing a Chairman and a Secretary who also serves as a vote teller.

5. Minutes

Copies or extracts from the minutes of the General Meeting shall be ratified by the Chairman or by his / her legal substitute or by his / her replacement or by any person appointed by the Board of Directors.

6. Shareholders' Rights before the General Meeting

- From the day of publication of the invitation to convene the General Meeting until the day of the meeting itself, the Company posts on its website the following information:

(a) the invitation to convene the General Meeting,

(b) the total number of shares and voting rights that the shares incorporate at the date of the invitation, indicating also separate totals per share class,

(c) the forms to be used for voting by a representative or delegate, and, where provided for, by ballot paper or mail vote and by electronic means, and

(d) the documents to be submitted to the General Meeting,

(e) a draft decision on each item of the proposed agenda and the draft resolutions proposed by the shareholders pursuant to paragraph 3 of article 141 of Law 4548/2018.

- The Company publishes the results of voting on its website, under the responsibility of the Board of Directors, within five (5) days at the latest from the date of the General Meeting, specifying for each decision at least the number of shares for which valid votes were cast, the proportion of capital represented by these votes, the total number of valid votes, as well as the number of votes in favor and against each decision and the number of abstentions.

7. Right of Participation and Voting

Each share is entitled to one (1) vote. Any individual appearing as a shareholder in the records of the Dematerialized Securities System (DSS) managed by the Hellenic Central Securities Depository (ATHEXCSD) or identified as such based on the relevant date through registered intermediaries or other intermediaries complying with the provisions of the law (Law 4548/2018, Law 4569/2018, Law 4706/2020, and Regulation (EU) 2018/1212), as well as the Operating Regulation of the Hellenic Central Securities Depository (Gov. Gaz. B΄ 1007/16.03.2021), is entitled to participate in the General Meeting.

The status of the shareholder must exist at the beginning of the fifth (5th) day before the initial session of the General Meeting. Proof of shareholder status can be provided by any legal means, and, in any case, based on information received by the Company from the CSD, under the condition it provides registry services or through the participants and registered intermediaries in the CSD in any other case.

For the Repeated General Meeting the status of shareholder must exist at the beginning of the fifth (5th) day prior to the day of the General Meeting in accordance with the provisions of article 124 par. 6 of law 4548/2018, as in force today, provided that the adjourned or repeated meeting is not more than thirty (30) days from the record date. If this is not the case or if a new invitation is published in the case of the repeated General Meeting, the General Meeting is attended by the person who has the shareholder status at the beginning of the third (3rd) day before the postponed or the repeated General Meeting.

Only those that have the shareholder capacity during the respective record date is considered by the Company to have the right of participation and voting at the General Meeting (initial and / or any repeated meeting).

It is noted that the exercise of the above rights (participation and voting) does not require the blockage of the beneficiary's shares or any other relevant process, which limits the ability to sell or transfer shares during the time period between the record date and the date of the General Meeting.

8. Minority Rights of Shareholders

Pursuant to article 141 of Law 4548/2018, the shareholders have, inter alia, the following rights:

(a) At the request of shareholders, representing one twentieth (1/20) of the paid-up share capital, the Board of Directors is obliged to convene an Extraordinary General Meeting of Shareholders, appointing a meeting date, which shall not be more than forty five (45) days from the date of submission of the application to the Chairman of the Board of Directors. The application contains the subject of the agenda. If no General Meeting is convened by the Board of Directors within twenty (20) days from service of the relevant application, the convocation shall be carried out by the applicant shareholders at the expense of the Company, by a court order issued during the injunctive measures procedure. This decision defines the place and time of the meeting as well as the agenda. The decision is not challenged by legal means.

(b) With the request of shareholders that represent one twentieth (1/20) of the paid-up share capital, the Board of Directors of the Company is obliged to list additional issues on the General Meeting's agenda, if the relevant request is received by the Board at least fifteen (15) days prior to the General Meeting. The request for the listing of additional issues on the daily agenda is accompanied by a justification or by a draft resolution for approval by the General Meeting and the revised agenda is published in the same manner as the previous agenda, at least thirteen (13) days prior to the General Meeting date and at the same time is disclosed to shareholders on the Company's website together with the justification or draft resolution submitted by the shareholders according to those stipulated by article 123, paragraph 4 of Law 4548/2018. If these issues are not published, the requesting shareholders are entitled to request the postponement of the General Meeting and to make the publication themselves.

(c) Shareholders representing one twentieth (1/20) of the paid-up share capital shall have the right to submit draft decisions on issues included in the original or any revised agenda. The relevant application must reach the Board of Directors seven (7) days prior to the date of the General Meeting and the draft decisions are made available to the shareholders according to the provisions of article 123 par. 3 of law 4548/2018 six (6) at least days prior to the date of the General Meeting.

The Board of Directors is not obliged to enroll issues on the agenda or to publish or disclose them together with justifications and draft decisions submitted by the shareholders according to the above paragraphs b and c respectively, if their content comes obviously contrary to law or ethics.

(d) At the request of a shareholder or shareholders representing one twentieth (1/20) of the paid-up share capital, the Chairman of the Meeting is obliged to postpone the decision of the General Meeting, either ordinary or extraordinary, for all or certain items, setting a day for the continuation of the meeting to conclude with these matters, the one specified in the shareholders' application, but this cannot be more than twenty (20) days from the date of the postponement. The postponement of the General Meeting is a continuation of the previous one and no repetition of the publication formalities of the shareholders' invitation is required. New shareholders cannot participate in it, subject to the relevant participation formalities.

(e) Following a request of any shareholder that is submitted to the Company at least five (5) full days prior to the General Meeting, the Board of Directors is obliged to provide to the General Meeting the specifically required information on the Company's affairs, to the extent that such are useful for the real assessment of the agenda issues.

No obligation to provide information exists when the relevant information is already available on the Company's website, especially in the form of questions and answers. Also, at the request of shareholders representing one twentieth (1/20) of the paid-up capital, the Board of Directors is obliged to announce to the General Meeting, if ordinary, the sums paid over the last two years to each member of the Board of Directors or the directors of the Company, as well as any benefit to such persons from any cause or contract between the Company and the members. In all the above cases, the Board of Directors may refuse to provide the information for substantive reason, which is recorded in the minutes. Such a reason may be, under the circumstances, the representation of the requesting shareholders in the Board of Directors in accordance with Articles 79 or 80 of Law 4548/2018. In the cases of this paragraph, the Board of Directors may respond in unison to shareholder requests with the same content.

(f) Following a request by shareholders that represent one tenth (1/10) of the paid-up share capital, which is submitted to the Company at least five (5) full days prior to the General Meeting, the Board of Directors is obliged to provide to the General Meeting information on the development of corporate affairs and the financial position of the Company. The Board of Directors may decline the provision of such information for reasonable cause, which is stated in the minutes. Such a reason may be, according to the circumstances, the representation of the requesting shareholders in the Board of Directors in accordance with Articles 79 or 80 of Law 4548/2018 or if the relevant members of the Board of Directors have received the relevant information in a sufficient manner.

(g) At the request of shareholders representing one twentieth (1/20) of the paid-up share capital, the voting on a subject or issues on the agenda shall be made by open vote.

In all the cases of Article 141 of Law 4548/2018, the requesting shareholders are required to prove their shareholder status and, except in the cases of the first subparagraph of paragraph 6 and paragraph 10, the number of shares they hold in exercising their rights. Demonstration of shareholder status can be done by any legal means, based on information received by the Company from the CSD, under the condition it provides registry services or through the participants and registered intermediaries in the CSD in any other case.

(h) Shareholders of the Company, representing at least one twentieth (1/20) of the paid-up share capital, are entitled to request extraordinary audit of the Company by court which has jurisdiction in the procedure of voluntary jurisdiction. Control shall be ordered if acts that violate provisions of the Company's law or the Articles of Association or decisions of the General Meeting are suspected.

(i) Shareholders of the Company representing one fifth (1/5) of the paid-up share capital are entitled to request the court to audit the Company, since from the course of the Company and on the basis of certain indications it is believed that the management of corporate affairs is not exercised as required by sound and prudent management. The court may consider that the representation of the requesting shareholders in the Board of Directors in accordance with Articles 79 or 80 does not justify the shareholders' request.

(j) Shareholders representing one twentieth (1/20) of the paid-up share capital have the right to submit a written application to the Board of Directors with the object of exercising the Company's claim pursuant to article 103 of Law 4548/2018.

(k) Shareholder holding shares representing 2 percent (2/100) of the share capital may request the annulment of a decision of the General Meeting that took place in a manner not consistent with the law or the Articles of Association, if he/she did not attend the General Meeting or opposed the decision.

(l) At the request of a shareholder or shareholders representing at least one third (1/3) of the paid-up capital, the Company may be dissolved by a court order if there is an important reason for doing so, which in a clear and permanent manner proves that its continuance is impossible.

9. Process for exercising voting rights through a proxy

The shareholder participates in the Extraordinary General Meeting and votes either in person or through a proxy. Each shareholder may appoint up to three (3) proxies. Legal entities participate in the General Meeting by appointing up to three (3) persons as representatives. However, if a shareholder owns Company shares, which appear in more than one security accounts, this limitation does not obstruct the said shareholder from appointing different proxies for the shares that appear in each security account in relation to the General Meeting. A proxy that acts on behalf of more than one shareholder can vote separately for each shareholder.

Specifically for shareholder participation by proxy at the Annual Ordinary General Meeting or any Repeated Meeting, remotely in real-time by teleconference, the shareholder or the Participant of the Securities Account in the DSS or another intermediary acting as custodian of the shareholder and holding his/her shares may appoint up to one (1) proxy.

A shareholder proxy must disclose to the Company, prior to the beginning of the Extraordinary General Meeting, any specific event that may be useful to shareholders in assessing the risk of the proxy serving other interests than those of the represented shareholder. There might be conflict of interests specifically when the proxy:

(a) is a shareholder that exercises control on the Company or is another legal entity controlled by the shareholder,

(b) is a member of the Board of Directors or generally the management of the Company or of a shareholder that exercising control on the Company, or another legal entity that is controlled by a shareholder who exercising control of the Company,

(c) is an employee or Chartered Auditor-Accountant of the Company or shareholder that exercising control of the Company, or another legal entity controlled by the shareholder who exercising control of the Company,

(d) is a spouse or first degree relative with one of the persons mentioned above in cases (a) through (c).

The appointment and revocation or replacement of the representative or proxy is applied in written or electronically and submitted to the Company in the same form, at least forty eight (48) hours prior to the defined date of the General Meeting.

The Company makes available the form it uses to appoint proxies on its website. This form is submitted completed and signed by the shareholder to the Company's Investor Relations Department or is sent by fax to the latter at least forty eight (48) hours prior to the date of the General Meeting.

The beneficiary shareholder is requested to confirm the successful dispatch and receipt of the proxy form by the Company by contacting the Company during working days and hours.

10. Procedure for remotely participating in the vote by Mail vote.

In addition, shareholders have the option to participate remotely, in person or by proxy, at the vote on the item of the Annual Ordinary General Meeting that will take place before the General Meeting, under the terms of article 126 of law 4548/2018 and under what it is mentioned below. Specifically, shareholders that wish to participate and vote remotely on the item of the Annual General Meeting that will take place before the General Meeting, can complete, and submit the "Mail vote form" which has been uploaded at the site of the Company, signed with a dully verified signature form or be sent digitally signed by using a recognized digital signature (qualified certificate) by the proxy or shareholder through email.

11. Other Shareholders' Rights & Method of Exercise

The Company has issued common registered shares listed on the Athens Exchange and registered in immaterial form in the records of the Dematerialized Securities System. There are no special rights in favor of specific shareholders.

The acquisition of Company shares implies the full and without any reservation acceptance of its Articles of Association and of the legal decisions made by its relevant bodies.

Each share provides rights corresponding to the respective percentage of share capital such represents. The responsibility of shareholders is limited respectively to the nominal value of shares owned. In case of co-ownership of a share, the rights of the co-beneficiaries are exercised only by a joint representative of such. The co-beneficiaries are responsible with solidarity and entirely for fulfilling the obligations that emanate from the common share.

Each Company share incorporates all the rights and obligations defined by Law 4548/2018, as its Articles of Association apply, and specifically:

- The right to participate and vote in the General Meeting.
- The right to receive dividend from the Company's earnings.
- The right on the product of liquidation, or respectively the capital depreciation that corresponds to the share, given that such is decided by the General Meeting. The General Meeting of the Company's shareholders maintains all its rights during liquidation.
- The pre-emptive right in any increase of the Company's share capital that

takes place by cash and through the issue of new shares, as well as the pre-emptive right in any issue of convertible bonds, given that the General Meeting that approves the increase does not decide differently.

- The right to receive a copy of the annual financial statements and reports by the Chartered Auditors-Accountants and Board of Directors of the Company.
- The rights of minority shareholders described below.

VIII. Report of the Audit Committee

1. SUMMARY FOR THE MANAGEMENT

In my capacity as Chairman of the Audit Committee of the Company, I hereby present the summary Report of the Committee for the financial year 2023 (01.01.2023 - 31.12.2023), in order to demonstrate the relevant actions and Committee's essential contribution toward the Company's compliance with the provisions of current legislative and regulatory framework in an environment characterized by intense and multilevel challenges as well as uncertainties.

The Audit Committee constitutes an Independent Committee and is consisted of one (1) Independent Non-executive Member of the Board of Directors of the Company and two (2) non-members - third parties.

The current Audit Committee was elected by the Extraordinary General Meeting of Shareholders on February 11th, 2021, as the Committee was reconstituted into a body following the resignation of the member Mr. Konstantinos Gianniris and his replacement by the new member Ms. Sophia Manesi. Following the replacement of Mr. Konstantinos Gianniris by the Annual Ordinary General Meeting of the Company's Shareholders on May 24th, 2023 and the appointment of Ms. Sophia Manesi as new member for the remainder of the term, the Audit Committee during its meeting on May 25th, 2023 was constituted in a body as follows:

Georgios Samothrakis	Independent Non-Executive Member of the Board – Chairman
Konstantinos Kotsilinis	Third party – non Board Member – Member
Sofia Manesi	Third party – non Board Member – Member

The members of the Audit Committee have in their entirety sufficient knowledge of the sector which the Company activates in, while the total members of the Audit Committee are independent of the Company, as the following apply:

(a) They do not hold shares representing an equity stake greater than 0.5% of the Company's share capital; and

(b) They do not have any dependency relationship with the Company itself or persons related to the Company. The dependency relationship is specified in particular in the provisions of article 9 par. 1 and 2 of Law 4706/2020.

Amounts in thousand Euro, unless stated otherwise

Furthermore, the criterion of sufficient knowledge and experience in the fields of auditing or accounting is demonstrably fulfilled both in the person of Mr. Georgios Samothrakis and in the person of Mr. Konstantinos Kotsilinis, both of whom are former Chartered Auditors - Accountants with a very broad background in terms of scientific knowledge and with rich professional experience as well as prior professional service. The above decisively and substantially contribute to the greater efficiency of the Audit Committee and assist in the implementation of its duties in the most appropriate manner with the aim of strengthening the dynamics as well as the value of the Company. Finally Ms. Sophia Manesi, possessing many years of experience in Internal Auditing, can make a substantial contribution to the Audit Committee so that the latter can carry out its work in the most effective manner and be able to provide substantial solutions and guidance facilitating at the same time the economic growth of the Company, while fulfilling all of its legal obligations.

The term of office of the Audit Committee as five years, beginning on February 11, 2021 and ending on February 11, 2026.

Furthermore, with regard to the Committee's actions during the previous year there is respective analysis in the following paragraphs:

2. MEETINGS - FREQUENCY OF ATTENDANCE OF EACH MEMBER PER YEAR IN THE MEETINGS

The Committee convenes at least four (4) times a year. The Chairman of the Committee decides on the frequency and schedule of meetings. Chartered Auditors- Accountants are entitled to request a meeting with the Committee if they deem it necessary.

During the year 2023, the Audit Committee convened sixteen (16) times with all its members present at all meetings and with the internal auditors, the independent Chartered Auditors - Accountants and the Head of the Regulatory Compliance and Risk Management Unit informing the Committee on matters related to their duties. In the majority of meetings, and following a relevant invitation made by the Committee, key executives in charge of the administration and management of the various corporate affairs and activities were also present.

The relevant minutes were kept for all meetings of the Committee that took place in year 2023, while during these meetings the Committee mainly examined the following issues according to the analysis presented in the next paragraphs:

3. EXTERNAL AUDIT / FINANCIAL INFORMATION PROCEDURE

The Audit Committee was mainly concerned with the following:

- The preparation process of financial information and the assessment of the financial statements of the Company in terms of their accuracy, completeness and consistency. In particular, it was found that the financial statements were in accordance with their legally binding content and framework of preparation. At the same time, the compliance with the respective publicity rules was verified, as well as the ability of investors and other users to have immediate, smooth and uninterrupted access to the financial information.
- The announcements concerning the financial performance of the Company and the careful examination of the main parts of financial statements that contain significant judgments and estimates by the Management.
- The provision of additional non-audit services to the Company by the audit firm to which the Chartered Auditor-

Accountant belongs. The selection and determination of the terms of collaboration and the remuneration of the Chartered Auditor- Accountant, through a relevant proposal presented at the Ordinary General Meeting of the Company as well as the selection criteria that should be applied and ultimately be fulfilled (provision of high quality services, fair, reasonable and competitive remuneration, etc.).

- The assurance of the state of independence of the Chartered Auditor-Accountant, of the objectivity and efficiency of the audit process, based on the relevant professional and regulatory requirements. In the above context, the Chartered Auditor- Accountant was summoned by the Audit Committee and joined its meetings four (4) times and more specifically on January 10th, April 11th, September 15th and December 11th, 2023. During the above meetings, the Chartered Auditor- Accountant confirmed the independence and absence of any external direction or directive or recommendation in the performance of duties. Furthermore, monitoring and ensuring the completeness, objectivity and effectiveness of the audit by the Chartered Auditor- Accountant constitutes a key priority of the Committee.

- The process of carrying out the mandatory audit of the separate and consolidated financial statements of the Group and the Company for the year 2022, as well as the content of the main and the supplementary report submitted by the regular auditor.

- The review of the separate and consolidated financial statements of the Group and the Company for the first half of 2023, the first quarter of 2023 and the 9-month period of 2023, as well as the Company's key operating and financial figures, which were publicly released for the respective periods.

- The performance of a procedure for the selection of a new Audit Firm, in application of article 42 of Law 4449/2017, i.e. the mandatory change of the existing Chartered Auditors- Accountants starting from the financial year 2024 and the drafting of a relevant proposal to the Board of Directors for their appointment.

The important audit issues (Risks and areas of emphasis of audit), which according to the judgment of the Audit Committee were adequately covered by the ordinary audit process, are the following:

Risk: Violation of Controls and Rules by the Management

Description of risk: The Management is theoretically capable of committing fraud due to its ability to manipulate accounting records and prepare misleading financial statements by violating controls and rules that otherwise appear to be applied effectively. Although the level of risk referring to any breach of controls and rules on behalf of the management will vary from entity to entity, the risk is nevertheless present in all entities. Due to the unpredictable manner in which such a breach could occur, the above is a risk of material error due to fraud and therefore constitutes a serious risk (IAS 240.31). The Management has implemented certain audit procedures at the entity level in order to prevent / detect possible violations of the controls and rules by the administration.

During the execution of audit procedures for the risk of fraud, no cases of realized or suspected fraud were identified.

Risk: Revenue Recognition (in € 000)

Group – Consolidated Financial Statements	2023	2022
Turnover – continued activities	€ 345,373	€ 394,382

Income recognition

The Group recognizes income from the sale of goods when the control of the goods is transferred to the customer, usually upon delivery, and there is no outstanding obligation that could affect the customer's acceptance of the goods. The main product categories are technical fabrics (Geosynthetics and fabrics for construction, garden projects, hospital and hygiene products, filter industry, automotive industry, industrial use, sports and leisure, carpets, yarns and belts) and packaging products (mega bags, sacks , packaging film, packaging fabrics, containers, buckets, cups, glasses, containers and trays, plastic boxes, bottles, various bags, waste bags, ropes and strings.) The Group accepts return of products only in case of a defective or generally non-standard product.

Significant risks

- **risk of error in income due to fraud.**
- **risk that the income from sales is not recognized based on the requirements of IFRS 15 as well as the risk that the time at which the risks and rewards are transferred has not been correctly depicted in the financial statements.**

Audit approach

- **Substantial audit procedures to detect material errors or verification at the end of the period to ensure that the risks and rewards of the transaction related to income from sales to third parties have been properly recognized and in the appropriate financial year.**

Audit results / conclusion

- **Based on the procedures carried out, no issues were identified in relation to the timing of income / revenue recognition.**

Other areas of audit emphasis

Risk	Significant / increased / standard risk	Risk identification factor	Audit approach
Impairment of participations in subsidiaries	Increased	The Management initially examines whether there are indications of impairment in order to proceed with an impairment test of its equity holdings. This particular process is complex, requires judgment and is based on a number of significant assumptions and estimates by Management. The procedures include a review of the assumptions used, the calculations made and an examination of the reasonableness of Management's estimates.	Examination of any evidence for impairment identified by the Management and substantive procedures to confirm the value of equity holdings in subsidiaries and related companies in the Financial Statements of 31.12.2023. No material errors were found during the audit.
Impairment of non-financial assets (Don & Low)	Increased	The Management initially examines whether there are indications of impairment in relation to non-financial assets in order to proceed with an impairment test. This particular process is complex, requires judgment and is based on a number of significant assumptions and estimates by Management. The procedures include a review of the assumptions used, the calculations made and an examination of the rationality of Management's estimates.	Examination of any evidence for impairment identified by the Management and substantive procedures to confirm the value of the tangible fixed assets in the Financial Statements of 31.12.2023. No significant errors were identified during the audit.
Provisions for employee benefits (Don & Low)	Increased	The provisions for employee benefits may be overstated or understated – since it is an area where significant judgment is required.	Substantive audit procedures to examine the rationality of estimates and assumptions used by Management. No material errors were found during the audit.
Goodwill Impairment	Increased	The Management initially examines whether there are indications of impairment in order to proceed with a goodwill impairment test. This particular process is complex, requires judgment and is based on a number of significant assumptions and estimates by Management. The procedures include a review of the assumptions used, the calculations made and an examination of the reasonableness of Management's estimates.	Examination of any evidence for impairment identified by the Management and substantive procedures to confirm the balance of the Goodwill item of the Financial Statements as of 31.12.2023. No material errors were found during the audit.

Conclusion: No significant deviations were detected in the above-mentioned areas of audit emphasis.

4. INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM / INTERNAL AUDIT UNIT

The Audit Committee also dealt with the following:

- The supervision of the Company's internal audits and monitoring the effectiveness of the Company's internal control and risk management systems to ensure that the main risks (such as risk of fluctuations in raw material prices, credit risk, liquidity risk, foreign exchange risk, interest rate risk, capital adequacy risk, etc.) are properly identified, addressed and disclosed.
- Ensuring the independence of the Internal Audit Unit, monitoring its smooth operation in accordance with international standards for the professional implementation of internal control procedures, but also in line with the current legal and regulatory framework (indicatively Law 4706/2020, as currently in force).
- Informing the Audit Committee, regarding the work of the Internal Audit Unit and its audit reports, the evaluation of the work, the adequacy as well as the efficiency of the unit as well as of the Head of Internal Audit.
- The submission of the audit reports from the Internal Audit Unit to the Board of Directors.
- The information provided to the Board of Directors of the Company regarding the areas that the Audit Committee, during the exercise of its duties, considers that there are essential issues and the monitoring of the response of the Management on the above issues.
- Defining and reviewing the operating regulation of the Internal Audit Unit of the Company.
- The identification of possible cases of conflict of interest during the Company's transactions with related parties or any unusual transactions that have not taken place under normal market practices and the submission of the relevant reports to the Board of Directors.
- Ensuring the existence of the required procedures, according to which the Company's personnel will be able, in confidentiality, to express their concerns about possible illegalities and irregularities in matters of financial information or other issues related to the operation of the Company, which they should then be properly investigated and addressed.

It is noted that the Audit Committee fully complying with the key points, clarifications and recommendations as well as the Questions and Answers (Q&As) of the documents with protocol number 784/20.03.2023 of the Department of Listed Companies of the Hellenic Capital Markets Commission underlines that both the main and the supplementary report submitted by the regular Chartered Auditor-Accountant does not include any of the following:

- o Important issues regarding financial information and reporting, and
- o Weaknesses on the level of the internal control system with regard to the auditor's supplementary report to the Audit Committee.

  Additionally, as already mentioned in the above paragraphs, the Audit Committee during the fiscal year of 2023:

- o Was informed of all the findings resulting from the reports compiled by the Internal Audit Unit,
- o Submitted specific proposals in relation to the above reports and findings either to the Internal Audit Unit or to the Company's Board of Directors, and in all cases there was a corresponding response to all issues that emerged.

5. REGULATORY COMPLIANCE AND RISK MANAGEMENT / REGULATORY COMPLIANCE AND RISK MANAGEMENT UNIT

In the context of implementation of Law 4706/2020, the supervision of the Regulatory Compliance and Risk Management Unit was included in the responsibilities of the Audit Committee, and therefore the Audit Committee mainly dealt with the following:

- Monitoring the level of compliance with corporate governance and specific governance practices such as data protection, cyber security and information security.
- Ensuring that there were no cases of conflict of interest in the Company's transactions with related parties. Provision of an update to the Board of Directors about the specific issue.
- Monitoring the process and the implementation of the risk assessment exercise on the level of the Company and its subsidiaries. The respective exercise was submitted to the Audit Committee.
- The completion of the assessment process of the Internal Audit System of the Company and its significant subsidiaries by an independent evaluator with a reporting date as of 31.12.2022 and with a reporting period from the entry into force of article 14 of Law 4706/2020 (17/7/21), as well as the content of the main and supplementary report submitted by the independent evaluator.
- The monitoring of the process and the implementation of assessment of the Company's Corporate Governance System with a reporting date as of 31.12.2023 and with a reporting period from the entry into force of article 14 of Law 4706/2020 (17/7/21), as conducted by the Secretary of the Board of Directors along with the assistance of the Regulatory Compliance & Risk Management Unit.
- Ensuring that there are structures and procedures, according to which the Company's personnel will be able, in confidence, to express concerns about potential illegalities and irregularities in matters of financial information or about other issues related to the operation of the business (Whistleblowing). Also ensuring the performance of effective and independent investigation of such matters and their appropriate handling.
- Informing the Board of Directors about the issues arising from the work carried out on the above areas.

6. SUSTAINABLE DEVELOPMENT POLICY

Thrace Plastics Group has put into effect from the year 2021 an official Sustainable Development Policy, while, at the same time, it has adopted and is following a 5-year Strategic Plan for Sustainable Development based on the following axes, each of which is broken down into specific actions and goals:

- Reduction of greenhouse gas emissions in all production processes;
- Improving the environmental impact of products;
- Implementation of circular economy related projects;
- Improving social aspects concerning the stakeholders;
- Ensuring responsible corporate governance;
- Awareness and certification of activities.

These axes correspond to the pillars of society, environment and corporate governance and include the principles of sustainable development upon which the Group's approach is based.

The focus areas of the above strategy have emerged through the recognition and prioritization -by the Management of the Group- of the essential issues of sustainable development (according to the international standards of Sustainable Development, GRI – Global Reporting Initiative), aiming at their timely, lawful and effective management of those issues and the delivery of tangible results for the creation of a greater value in the economy, the environment and the society where the Group operates.

Especially in recent years, the transition from the model of linear economy to the one of circular economy has been a great challenge for the Group, as it creates opportunities for further growth and development. Fully in line with the European strategy on plastics, the Group has taken initiatives to enter into the era of circular economy with the aim of reducing its environmental footprint. In this context, the Group constantly adapts its business model in order to reduce its carbon footprint and focus on the development of innovative products and services, applying the principles of the circular economy.

The strategy, the plans, the results and the relevant commitments are analyzed in the Sustainable Development Report of the Group which is posted on its Website.

7. SUMMARY OF ITEMS AND PERFORMANCE OF MISSION

A summary of the items of the agenda of the Audit Committee per meeting is being attached to the current document.

Finally, it is noted that during the exercise of our Audit Committee's duties, we had and continue to have unhindered and full access to all the information we need each time, while our Company provides the necessary infrastructure and space in order to effectively perform all our duties.

Georgios Samothrakis

Chairman of the Audit Committee of Thrace Plastics Co S.A.

8. APPENDIX - SUMMARY OF THE ITEMS OF THE AGENDA OF THE AUDIT COMMITTEE PER MEETING

Summary of the Audit Committee Meetings of Thrace Plastics Group for the Financial Year 2023		
Date of Meeting	**Items of the Meeting's Agenda**	**Participation**
10/1/2023	1. Validation of minutes of previous meeting. 2. Update from PWC on the course of the external audit of the Group's companies	Quorum
13/1/2023	1. Validation of the minutes of the previous meeting. 2. Update from DELOITTE on the evaluation of the Group's Internal Audit Unit	Quorum
18/1/2023	1. Validation of the minutes of the previous meeting. 2. Approval of a Memorandum submitted to the Board of Directors for the selection of new external auditors	Quorum
24/2/2023	1. Validation of minutes of previous meeting. 2. Overview of the compliance audit report in the areas indicated by the provisions of Law 4706/2020 and the Capital Market Commission's decision 1/891 «Evaluation of the Internal Control System». 3. Overview of the annual update on the company's Risk Management. 4. Review of the Report of the Regulatory Compliance and Risk Management, and Internal Audit Units by the Audit Committee. 5. Presentation of the proposed Annual Program of the Regulatory Compliance and Risk Management Unit. 6. Quarterly report of the Audit Committee to the BOD	Quorum
13/3/2023	1. Validation of minutes of the previous meeting. 2. Presentation by PWC of «Thrace Group L4706 Status Update» - 2nd deliverable of the project «Evaluation of the Internal Control System - Law 4706/2020». 3. Approval of the Internal Audit Unit's work plan for the audit year 2023.	Quorum
24/3/2023	1. Validation of minutes of the previous meeting. 2. Presentation by PWC of «Thrace Group L4706 Readiness assessment» - Final deliverable of the project «Assessment of Internal Control System - Law 4706/2020».	Quorum
11/4/2023	1. Validation of Minutes of the Previous Meeting. 2. Presentation by PwC about the regular audit and conclusions. 3. Discussion on the drafts of the Financial Statements and the Reports of the Chartered Auditors- Accountants. 4. Quarterly report of the Audit Committee to the BOD	Quorum

Amounts in thousand Euro, unless stated otherwise

Summary of the Audit Committee Meetings of Thrace Plastics Group for the Financial Year 2023		
21/4/2023	1. Validation of Minutes of Previous Meeting. 2. Approval of Annual Financial Report 1.1.2022 – 31.12.2022 and Validation of Audit Committee Memorandum to the Board of Directors. 3. Approval of the management report of the Board of Directors and discharge of the Regular Auditor with regard to any liability for the closing financial year 2022 (01.01.2022-31.12.2022). 4. Proposal for the Election of an Auditing Company from the Public Registry for the mandatory audit of the annual and semi-annual Financial Statements of the current financial year 2023 (01.01.2023-31.12.2023) and determination of its remuneration. 5. Validation of the Audit Committee's Activity Report for the financial year 2022. 6. Validation of the Memorandum of the Audit Committee submitted to the Board of Directors	Quorum
2/5/2023	Re-constitution of the Audit Committee as a body and election of its Chairman in accordance with the provisions of article 44 of Law 4449/2017, as applicable after its amendment by Law 4706/2020, following the replacement of a member of this Committee.	Quorum
16/5/2023	1. Validation of minutes of previous meeting. 2. Approval of the financial statements for the period ending on 31 March 2023 and of the relevant memorandum of the Audit Committee submitted to the Board of Directors. 3. Providing information to a new Member of the Committee about the basic characteristics of the Group's business operations and the departments supervised by the Audit Committee.	Quorum
20/6/2023	1. Validation of minutes of previous meeting. 2. Review of the Whistleblowing Policy and Procedure. 3. Quarterly report of the Audit Committee to the BOD	Quorum
15/9/2023	1. Validation of minutes of previous meeting. 2. Provision of an update to external auditors for the 2023 semi-annual financial statements. 3. Approval of the semi-annual financial statements of the year 2023 and the relevant memorandum of the Audit Committee submitted to the Board of Directors.	Quorum

Amounts in thousand Euro, unless stated otherwise

Summary of the Audit Committee Meetings of Thrace Plastics Group for the Financial Year 2023		
24/10/2023	1. Validation of minutes of previous meeting. 2. Providing information to the Audit Committee regarding the subject of the evaluation of Corporate Governance System. 3. Quarterly report of the Audit Committee to the BOD	Quorum
15/11/2023	1. Validation of minutes of previous meeting. 2. Approval of the financial statements for the period ending on 30 September 2023 and of the relevant memorandum of the Audit Committee submitted to the Board of Directors.	Quorum
29/11/2023	1. Validation of minutes of previous meeting. 2. Progress of the work of the Internal Audit Unit based on the annual plan and the extraordinary projects. 3. Presentation of internal audits that have been recently assigned and have not been presented to the Audit Committee. 4. Presentation of the progress of corrective actions with regard to the audit findings relating to past audit reports. 5. Update on the completion by the Internal Audit Unit of the project titled "General Group Policies Renewal". 6. Update on the completion by the Internal Audit Unit of the project of Renewal of the Customized Analytical Procedures of the Greek Companies: i. Thrace NG & Thrace Polyfilms & Thrace Eurobent, ii. Thrace Plastics Pack, iii. Thrace Holding. 7. Instruction in English for approval of travel expenses of the MDs/GMs of subsidiary companies. 8. Progress of corrective actions resulting from Deloitte's Extended External Quality Assessment completed in January 2023. 9. Discussion about the existing audit areas of the Internal Control Unit and the need for identifying new areas of audit in the future (including information on how and to what extent the issues related to: a. quality control, b. fire safety, c. safety/health/environment are being dealt with, up until today). 10. Work progress of the Regulatory Compliance & Risk Management Unit. 11. Discussion about the upcoming Evaluation of the Corporate Governance System. 12. Other Matters.	Quorum
11/12/2023	1. Validation of minutes of previous meeting. 2. Update from PWC on the course of the external audit in relation to the Financial Statements of the Group's companies.	Quorum

Amounts in thousand Euro, unless stated otherwise

Non Financial Report

SECTION 12: Non-Financial Report

INTRODUCTION

Contents

The current Non-Financial Report (Statement) constitutes part of the Annual Financial Report of Thrace Plastics Group (hereinafter «Group»), it concerns the fiscal year January 1, 2023 to December 31, 2023 and it was prepared in accordance with the Group's ***Non-Financial Information Development Process***, as it was approved on 16/07/2021 by the Board of Directors. The Group's business model is described in detail at the beginning of the Annual Financial Report. This section includes information on the following:

1. Approach to Sustainable Development

In addition, it contains a detailed description of the Group's actions for the following thematic areas, as defined in section 7 «Report (Statement) of Non-Financial Information» of circular 62784/2017 in accordance with the provisions of Law 4403/2016:

2. Anti-corruption and issues related to bribery
3. Respect for human rights
4. Supply chain issues
5. Social and labor issues
6. Environmental issues and climate change

Each of the above areas is analyzed in three axes: (1) Main risks and their management, (2) Due diligence policies and other policies, (3) Results of said policies and non-financial key performance indicators. In addition to the above, the following thematic sections are also included:

7. Impact of the COVID-19 pandemic on non-financial issues
8. Taxonomy Report, in accordance with Taxonomy Regulation 2020/852/EU

Frame of reference

This Report (Statement) of non-financial information was prepared by the Group's Sustainable Development Department. The responsibility for the accuracy and completeness of the quantitative and qualitative information included in the Report (Statement) belongs exclusively to the Group. It has been compiled according to **GRI** standards. For reasons of consistency and completeness of the information provided, as well as comparability of the data, the corresponding data of the two previous years are also displayed. At the same time, other valid standards, tools and recommendations from internationally recognized initiatives have been taken into account in order to ensure compliance with a complete as possible framework of disclosure indicators, such as the **SASB** standards for the chemicals sector, the recommendations for the disclosure of financial information related to climate of the international initiative **TCFD**, the **CDP** and **EcoVadis** assessments on environmental impacts and business practices, the ESG Information Disclosure Guide of the Athens Stock Exchange, where the Group participates in the **ATHEX ESG** index, as well as the impact on the UN Sustainable Development Goals (**SDG**). For clarification on the terminologies included in this report, an Index of Abbreviations is listed at the end of the section.

Disclaimer

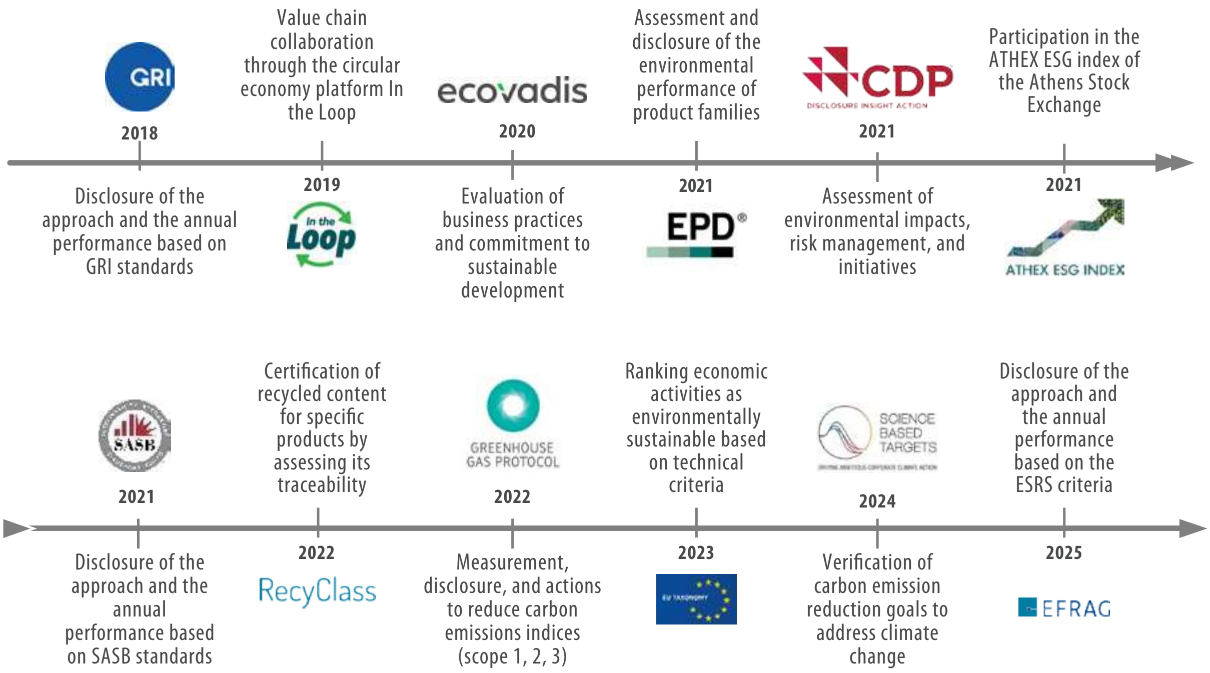
Any deviation at last-digit-level of the quantitative information in this Report (Statement) is due to rounding of the amounts. Prices listed are subject to change. The values mentioned may be subject to change in relation to the final quantitative information after their verification by a certified body and detailed data to fully cover the indicators that will be published in the 6th Sustainable Development Report for the year 2023. Insignificant differences that may have arisen in previous years are due to the detailed recalculation of the data and the conversion rates. It should be noted that the quantitative information included in the Non-Financial Information Report constitutes a horizontal sum of the individual companies, whether subsidiaries or associates, for the purpose of presenting the quantitative dimensions in full, which represents a different approach compared to the consolidation basis of financial dimensions, as reflected in the Financial Report.

12.1 Approach to Sustainable Development

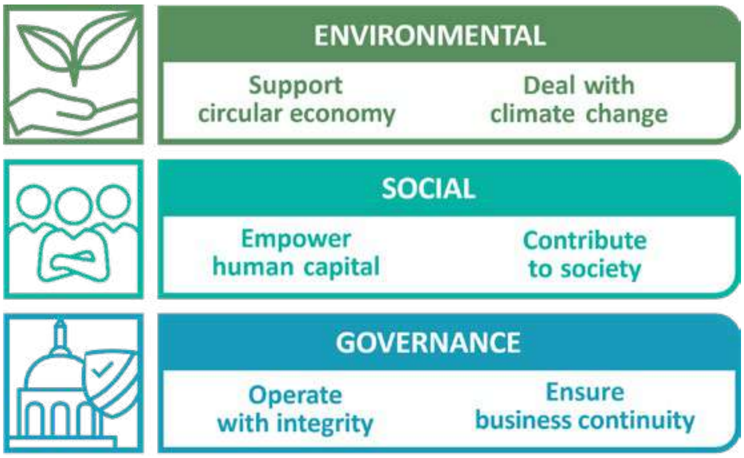
OBJECTIVE

The goal of the Group through its principles, policies, and strategy for sustainable development is the growth with respect to society and the environment, in order to remain a reliable social partner and create solutions for a sustainable future.

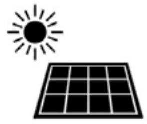
The Group consistently aligns with the most significant initiatives for sustainable development



PRINCIPLE

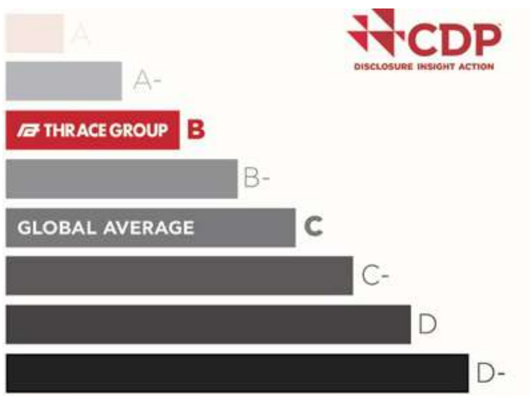


PERFORMANCE 2023

10.8 MW	Power of Photovoltaic Systems [6.7 MW in 2022]	
7.8%	Energy Consumption from Renewable Sources	
12.9 thousand tons	Use of Recycled Raw Materials	
-12.6%	Reduction of total Waste	
-21.7%	Reduction of Waste to Landfill	

DISTINCTIONS AND ASSESSMENTS

- The Group participates in the international organization CDP, which evaluates organizations regarding their environmental impacts, management of environmental risks, and demonstration of best practices. In 2023, it solidified its position by receiving a "B" distinction for its performance in relation to climate change, confirming that it is on par with the industry average while exceeding the global average.



- The Group participates in the international initiative SBTi (Science Based Targets Initiative), which validates emission reduction targets based on the most credible scientific data for climate change. It has committed to establishing science-based targets for carbon footprint reduction, and the validation process has already commenced.
- The Group engages with the European organization EcoVadis, which evaluates organizations regarding their business practices and commitment to sustainable development. In 2023, it received 5 silver distinctions through its subsidiaries: Pack, Nonwovens & Geosynthetics, Polyfilms, Greiner, and Ipoma.
- The Group was ranked on the highest scale (Platinum) in the ESG Transparency Index by Forbes, reflecting the level of transparency on ESG matters among the top 100 companies in Greece.

PARTICIPATION IN INITIATIVES

- In **EDANA** which consists of a global association of non-woven and related industries.
- In the organization Polyolefin Circular Economy Platform (**PCEP**) which aims to redesign and recycle packaging products and materials.
- In Circular Plastics Alliance (**CPA**) initiative which aims to use 10 million tonnes of recycled plastic by 2025 within the EU.
- In Synthetic Turf Council (**STC**) which is a non-profit trade association for the promotion, development and support of the synthetic turf industry.
- In the European Man-made Fibers Association (**CIRFS**) which is active in the European technical fiber industry.
- In the European Association of Geosynthetics Manufacturers (**EAGM**) which aims to promote the knowledge and use of European synthetic products.
- In the Association of Hellenic Plastic Industries (**AHPI**) which is active in the field of plastic applications.
- In the Association of the Greek Manufacturers of Packaging & Materials (**AGMPM**) which is active in the packaging material production industry.
- In the Association of Businesses and Industries (**SEV**) which aims to represent Greek businesses and industries and defend their interests.

Certifications
ISO 14001:2015 *Environmental management*
ISO 45001:2018 *Health and Safety Management*
ISO 50001:2018 *Energy management*
ISO 9001:2015 *Quality management*
ISO 13485:2016 *Quality management of medical technology products*
ISO 22000:2018 *Food safety*
BRC, IFS, FDA, HALAL *Food safety and quality*
Global GAP *Implementation of good agricultural practices*
EuCertPlass *Recycling of secondary raw material*
Recyclass *Content in recycled raw material*
OK Recycled *Calculation of recycled content*

Certifications
CoVid Shield *Health and safety*
Oeko-Tex® Standard 100 *Content of harmful substances*

POLICY

[ATHEX ESG: C-G4]

The Group establishes, maintains, and implements fundamental principles related to the pillars of society, the environment, and the economy. It has formulated and implemented a specific policy regarding sustainable development and the management of social, environmental, and corporate governance issues. At the core of the ***Sustainable Development Policy*** is the Group's commitment to growing with respect for society and the environment, creating solutions for a sustainable future. Monitoring the implementation of the Sustainable Development Policy is the responsibility of the Sustainability Committee (Environment-Society) and the Audit Committee (Corporate Governance) at the level of the Board of Directors, along with the Sustainable Development Department at the administrative level. The Sustainable Development Policy was approved in 2021 by decision of the Board of Directors, is reviewed annually, and is available on the Group's website.

SUPERVISION

[ATHEX ESG: C-G2]

Supervision of Sustainable Development is carried out as follows according to the ***Internal Rules of Operations***:

Sustainability Committee

Comprised of executive and non-executive members of the Board of Directors, its primary purpose is, according to the ***Terms of Reference of the Sustainability Committee***, the study, pre-approval, and recommendation to the Board of Directors of the strategy, management, and monitoring of environmental and social sustainability issues. Sustainable Development issues are discussed in the Sustainability Committee based on the information received from the Director of Sustainable Development acting as Secretary, in order to determine priorities, corresponding objectives, relevant timelines, as well as monitoring the progress of their implementation. The Sustainability Committee is responsible for informing the other members of the Board of Directors.

Audit Committee

According to the ***Terms of Reference of the Audit Committee***, it is responsible for managing and monitoring corporate governance issues, in addition to supporting the Board of Directors in its duties regarding the financial reporting process, internal control system procedures, risk management, and regulatory compliance. It is also responsible for supervising the internal audit department and the mandatory audit of the annual and consolidated financial statements.

Sustainable Development Department

Its purpose is to implement actions and initiatives that promote sustainable development and create value for stakeholders, society, and the environment, in accordance with the Group's policy and strategic Sustainable Development plan. The ***Internal Rules of Operations*** describe its core responsibilities.

STRATEGY

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

The Sustainable Development Directorate has developed the Sustainable Development Strategic Plan 2022-2026 which has been approved by the Sustainability Committee. The Strategic Plan is based on the following strategic objectives, in accordance with the relevant Policy, each of which is broken down into specific actions and targets.

1. *Reduce greenhouse gas emissions in all processes*

The actions include continuously increasing the use of recycled raw material, reducing residues from production processes, reducing energy consumption, investing in renewable energy sources and reducing waste.

2. *Improve product environmental impact*

The actions include designing sustainable products, reducing average weight and developing new reusable solutions.

3. *Implement circular economy projects*

The actions include strengthening cooperation with existing and new partners on the basis of circular economy initiatives and reducing the environmental impact of the supply chain.

4. *Improve the social aspects affecting all stakeholders*

The actions include establishing a cooperation framework with suppliers based on environmental and social criteria, developing and training employees towards improving skills, health and safety issues, as well as technical characteristics of products and applications, ensuring employee health and safety, and supporting local communities.

5. *Ensure a responsible corporate governance*

The actions include informing about sustainable development issues, informing about the directives of the corporate governance legislation, ensuring their correct implementation and incorporating best practices.

6. *Build awareness and obtain appropriate certificates*

The actions include strengthening the sustainability communication strategy, life cycle analysis and environmental footprint studies for each product group, obtaining appropriate certificates and participating in international assessment initiatives.

ESTABLISH DIALOGUE WITH INTERESTED PARTIES

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

As interested parties, entities are defined as those that either have direct or indirect influence on the Group and its activities, or are recipients of the direct or indirect impact arising from its activities. The Group maps the stakeholder groups that affect its ability to implement its strategy and achieve its goals with their decisions. On an annual basis, it validates stakeholder groups, improves communication and consultation methods, and records their key needs and expectations. For the Group, establishing dialogue is crucial, as it contributes to its effective operation by understanding market conditions and mitigating potential risks. The Group, mainly through the materiality analysis, identifies the stakeholder groups that are affected by its activities, but also influence the strategy and mitigation of potential risks and thus contribute to its more efficient operation. In this context, the Group maps the groups of interested parties and annually validates them.

The Group has established a ***Corporate Communication Policy*** in order to define a single framework for the management of corporate communication through the observance of common principles and rules harmonized with its strategy. At the same time, it has established an internal and external communication process, which also covers communication with external stakeholders. At the same time, it has established a ***Process of Internal and External Communication***, which covers communication with stakeholders as well. The process includes adequate and effective communication mechanisms with both stakeholders and active dialogue (shareholder engagement), as well as with employees, aiming for a systematic and two-way communication through appropriate channels of internal and external communication. Procedures have been defined to cover internal communication with Management, the Board of Directors, and staff, as well as communication with external stakeholders (shareholders, customers, investors, suppliers and partners, government and local authorities, local and broader society).

MATERIALITY ANALYSIS

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

The Group proceeded at the end of 2022 to the reevaluation of important issues related to the creation of economic, social and environmental benefit throughout the value chain and proceeded to the prioritization of them in relation to its business model based on the methodology of the internationally valid GRI reporting standards. For the sake of data comparability, the Group utilizes the outcome of materiality analysis for two consecutive annual reports.

Stage 1: Understanding and updating the Group's business model

Responsible for implementation: Directorate of Sustainable Development

Development of an information base for a better understanding of topics and trends in Sustainable Development based on the strategic development plan of the Group, the policies and processes of the Group, the United Nations Sustainable Development Goals, the international valid reporting standards followed by the Group, and the risk analysis of the Group.

Stage 2: Recording of important issues

Responsible for implementation: Directorate of Sustainable Development

Identification of actual and potential positive and negative impacts of the Group on the economy, the environment and society and recording of important issues that represent and group the most significant impacts.

Stage 3: Validation of important issues

Responsible for implementation: Sustainability Committee and Audit Committee

Validation by the Sustainability Committee and the Audit Committee of the important issues that represent and group the Group's most significant impacts on the economy, the environment and society.

The important issues for the Group in relation to the values and the Sustainable Development Goals are the following:

ENVIRONMENT

Support circular economy	Deal with climate change
1. Product innovation & life-cycle	5. Direct & indirect GHG emissions
2. Virgin & recycled raw materials	6. Climate risks & opportunities
3. Waste & scrap management	7. Energy efficiency & renewable energy
4. Water & effluents management	8. Biodiversity & conservation

SOCIETY

Empower human capital	Contribute to society
9. Employee health, safety & well-being	13. Product quality, safety & information
10. Human rights, diversity & inclusion	14. Customer health, safety & satisfaction
11. Employment creation & safeguarding	15. Responsible supply chain & local suppliers
12. Employee training & talent retention	16. Social contribution & engagement

GOVERNANCE

Operate with integrity	Ensure business continuity
17. Business ethics & anti-corruption	21. Emergency preparedness & response
18. Governance structure & mechanisms	22. Economic value generated & distributed
19. Regulatory compliance & policies	23. Investment in infrastructure & processes
20. Privacy protection & information security	24. Risks & potential impact analysis

Amounts in thousand Euro, unless stated otherwise

Stage 4: Prioritization & validation of essential issues

Responsible for implementation: Sustainable Development Directorate, Sustainability Committee and Audit Committee

Consultation with stakeholders for the prioritization of important issues. The consultation was carried out with representation by Group executives of the following main groups of interested parties, with whom they maintain relationship and communication.

- Shareholders & Investment Community
- Board of directors
- Management
- Employees
- Customers
- Suppliers
- State
- Non-Governmental Organizations & Civil Society
- Business Associations

The issues that emerged from the prioritization as material were validated by the Sustainability Committee and the Audit Committee are the following:

Material topics	SDGs
Environment	
1. Product innovation & life-cycle	9, 12
2. Virgin & recycled raw materials	12
5. Direct & indirect GHG emissions	13
7. Energy efficiency & renewable energy	7
Society	
9. Employee health, safety & well-being	3
13. Product quality, safety & information	3
14. Customer health, safety & satisfaction	3
Governance	
17. Business ethics & anti-corruption	16
19. Regulatory compliance & policies	16
22. Economic value generated & distributed	8

The Group, through the material topics, focuses on 7 of the 17 Sustainable Development Goals in which monitors its progress:

3 GOOD HEALTH AND WELL-BEING | 7 AFFORDABLE AND CLEAN ENERGY | 8 DECENT WORK AND ECONOMIC GROWTH | 9 INDUSTRY, INNOVATION AND INFRASTRUCTURE | 12 RESPONSIBLE CONSUMPTION AND PRODUCTION | 13 CLIMATE ACTION | 16 PEACE, JUSTICE AND STRONG INSTITUTIONS

RISK MANAGEMENT

[ATHEX ESG: SS-G3]

The Group has adopted a ***Risk Management Framework***, which aims at effective management of risks and integrates the Risk Management Policy and Procedures. This framework, which is regularly assessed and revised, assists Management to identify new opportunities and challenges, provides consistency and maturity in risk management and aligns risk-taking with willingness to undertake, enforces a culture of integrity, transparency, accountability and continuous development, improves the decision-making process and supports the responsible autonomy, strengthens the Group's control environment in order to be able to respond quickly to changing environments, reduces performance variability, improves resource development and strengthens the Group's resilience.

Amounts in thousand Euro, unless stated otherwise

12.2 Anti-corruption and bribery-related issues

12.2.1 Main risks and their management

The Group recognizes the occurrence risks of corruption, extortion and bribery incidents throughout its value chain. Potential risks are examined both within its internal operations and in relation to its activities and transactions with its key stakeholders, such as customers and suppliers. The Group is committed to conducting its activities in accordance with the highest ethical standards and demonstrating zero tolerance for any form of corruption and bribery. For this reason, it has implemented the ***Anti-Fraud Policy*** and, with responsibility and business integrity, is committed to making every possible effort to ensure transparency and legality.

12.2.2 Due Diligence and Other Policies

The Group has adopted and follows an integrated framework of principles and policies that ensure its transparency and responsible operation. In order to ensure the avoidance of corruption and bribery incidents, it operates proactively, conducting relevant updates and audits on an annual basis through the Internal Control Department. To discourage participation in such an incident, disciplinary measures have been established. In the context of supporting the internal procedures, the Audit Committee has been set up, tasked with the selection process, as well as the supervision of the external auditors and informing the Board of Directors of the result of the mandatory audit, the monitoring of the financial information process, the internal control and risk management systems and the supervision of the internal control and regulatory compliance and risk management units. Furthermore, the Group has implemented the ***Regulatory Compliance Policy***, which covers all current regulatory requirements regarding compliance, aiming to ensure the management of regulatory compliance risks through the implementation and oversight of the Regulatory Compliance System.

Code of Ethics and Conduct

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

The Group's firm commitment is to conduct its business with integrity, in accordance with the highest ethical standards and by applying current laws. The ***Code of Ethics and Conduct*** defines the standards of behavior required by employees and apply in every country where the Group operates.

The basic Principles of the Code are as follow:

- Business ethics
- Respect for human rights
- Diversity and equal representation
- Compliance with laws and social norms
- Product quality
- Promotion of fair and free competition
- Avoiding conflict of interest
- Accuracy and completeness of financial information
- Protection of corporate assets
- Cooperation with public authorities legally and transparently
- Conducting all transactions with integrity and combating corruption

- Protection and confidentiality of information
- Good working relations
- Safety, health and environmental protection
- Circular economy and climate change
- Social contribution

Corporate Governance Code

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

Internal Rules of Operation

The ***Internal Rules of Operation*** is harmonized with the requirements of law 4706/2020 and it was approved by the relevant decision of the Board of Directors. A summary of the Regulation is listed on the Group's Website in the Corporate Governance section.

Group Policies' Manual

The ***Group Policies' Manual*** is complementary to the other policies of the Group but in any case precedes them, as it forms the basis of the policies and procedures of the Group. Its purpose is to establish a uniform approach through a common framework, specifying the control functions that should be followed as a minimum.

Reporting Platform

[ATHEX ESG: SS-G1]

The Group has developed a ***Whistleblowing and Anonymous Reporting Policy***, as well as a ***Whistleblowing Management Procedure***, and utilizes the "EthicsPoint" Reporting Platform. Through this platform, individuals have the opportunity to report violations related to corruption and bribery, non-compliance, human rights violations, or personal data breaches in full compliance with Law No. 4990/2022. Each report is evaluated based on the relevant whistleblowing management procedure, and the appropriate subsequent course of action is determined. The Group ensures regular updates on platform operation and is committed to maintaining confidentiality regarding personal data, timely and proper management of reports, and taking necessary measures for addressing issues.

12.2.3 Outcomes of the aforementioned policies and non-financial performance indices

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

There have been no reports of incidents of corruption or bribery arising from the communication channels maintained by the Group (reporting platform, email, telephone, mail, verbal). The Group has not become aware of any relevant intention or behavior. As a result, no financial damage has occurred.

12.3 Respect for human rights

12.3.1 Main risks and their management

The Group recognizes the risks associated with human rights violations, both within the working environment and in the supply chain, such as the possible discrimination of employees due to race, religion, gender, nationality, beliefs, age, disability, etc., the violation of privacy, forced and child labor. It advocates the elimination of all forms of forced and compulsory labor, the effective abolition of child labor and the elimination of discrimination in terms of employment and work. The Group is committed to zero tolerance in matters related to human rights and it has established and it has communicated relevant principles and policies.

12.3.2 Due Diligence and Other Policies

The Group has established a ***Human Rights Policy***, demonstrating zero tolerance for workplace harassment, discrimination based on race, gender, religion, nationality, age, disability, orientation, etc., as well as instances of forced and child labor, both within the Group's companies and throughout the supply chain. The Group applies selection and evaluation criteria to avoid engaging in work with partners at high risk of human rights violations and is committed to continuous improvement of actions and controls regarding human rights in its interactions with suppliers and collaborators.

The Group is committed to recognizing, evaluating, preventing, and eliminating the risks of human rights violations, exercising due diligence and taking immediate corrective actions to address any incidents. Specifically, the commitment includes:

- Sensitizing employees through information and education,
- Promoting respect and protection of Human Rights across all activities,
- Promptly addressing incidents through the violation reporting mechanism, allowing employees to express their concerns and report incidents of human rights violations, investigating and addressing employee concerns and resolving complaints through corrective actions.

Additionally, the Group commits to strengthening mechanisms and procedures to prevent and address violence and harassment, implementing the ***Policy for Preventing and Combating Violence and Harassment at Work.*** The purpose of this policy is to develop and promote a work environment where:

- mutual respect is encouraged, and employees have the right to work without experiencing harassment and oppression,
- behaviors and incidents of violence and harassment are prevented,
- zero tolerance for such behaviors and incidents is demonstrating.

The specific objectives of the policy are:

- to identify violence and harassment, recognize potential risks and consequences,
- to inform about the measures applied by the Group for preventing and combating incidents of violence and harassment,
- to define the rights and obligations of employees and employers,
- to emphasize the Group's support for victims of domestic violence.

Furthermore, through the ***Code of Ethics***

and Conduct, the Group has established principles for respecting human rights and protecting the confidentiality of information. The Group commits to zero tolerance for workplace harassment, discrimination, and instances of forced or child labor across its value chain. It also commits to resolving complaints and treating employees fairly and impartially, keeping employees informed through the ***Internal Work Regulations.*** Additionally, a responsible party for receiving and monitoring reports (RPMM) has been appointed for each company.

Evaluation criteria for entering into cooperation

The Group, through its ***Code of Ethics and Business Conduct*** and the ***Procurement and Accounts Payable Procedure***, applies selection and evaluation criteria to avoid entering into partnerships with collaborators who pose a high risk of violating human rights. The Group is committed to the continuous improvement of processes and evaluations concerning human rights in its interactions with suppliers and partners.

Personal data protection

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

The Group respects the privacy of its stakeholders and keeps their personal information confidential in compliance with the relevant legislation. It strictly applies the General Data Protection Regulation (GDPR) EU 2016/679, as well as the national legislation l. 4624/2019 concerning the protection of natural persons against the processing of personal data. Measures are implemented in order to comply with the requirements of the Regulation, implementation controls and periodic staff training. At Group level, a Data Protection Officer has been appointed and an insurance contract has been activated, in order to ensure any loss of personal data.

Additionally, the Group has implemented the ***Data Protection Policy***, which outlines how personal data is processed and is available on the Group's website. At the Group level, a Data Protection Officer has been appointed, and an insurance contract has been activated to ensure any loss of personal data.

Simultaneously, the ***Information Systems Policy*** has been enforced, where information security plays a crucial role, primarily encompassing the concepts of confidentiality, availability, and integrity of information.

12.3.3 Outcomes of the aforementioned policies and non-financial performance indices

[GRI: 406-1]

There have been no complaints of incidents of discrimination based on race, religion, gender, nationality, beliefs, age, disability, etc., harassment, violation of human rights, or breach of personal data arising from the communication channels maintained by the Group (reporting platform, email, telephone, mail, verbal). The Group has not become aware of any relevant intention or behavior. As a result, no financial damage has been incurred.

12.4 Supply chain issues

12.4.1 Main risks and their management

In the Group, apart from the financial risks, there are also recognized non-financial risks that are related to the supply chain and mainly concerns the safeguarding of human rights and the fight against corruption. The Group is committed to zero tolerance in these matters and it has established and communicated relevant principles and policies.

12.4.2 Due Diligence and Other Policies

The Group recognizes that the evaluation and selection of suppliers constitutes a necessary business function in order to achieve a responsible supply chain and it applies practices so as to determine whether a supplier meets the requirements and conditions set in the cooperation among them.

Monitor of suppliers' performance

[GRI: 308-1, 414-1, ATHEX ESG: C-S8]

Major categories of suppliers include suppliers of raw materials, trading goods, electricity, equipment, packaging, spare parts, logistics partners, transport industry services, consulting services, telecommunications and IT services.

According to the ***Procurement and Accounts Payable Policy*** and Procedure, the evaluation of suppliers' selection constitutes a distinct and documented process taking into account objective and fixed criteria of cost, reliability, quality of provided materials/services, terms of payment, speed of delivery, possible synergies with other companies of the Group or with the quality control departments (if feasible) and is based on written evaluations (supplier evaluation questionnaire, evaluation table with criteria, etc.).

The supplier evaluation questionnaire is applied by all the production companies of the Group, where each supplier is asked to describe:

- its compliance with the current regulatory framework of the countries in which it operates, where it should also have the necessary insurance coverage for cases of defective product.
- the quality of its activities through certification and quality assurance systems and in matters related to environmental protection and health and safety at work, where required.
- dealing with issues of corruption and bribery, conducting business with integrity.
- the observance of moral and ethical principles regarding human rights, phenomena of harassment in the workplace, any form of discrimination due to race, religion, gender, nationality, beliefs, age, disability, etc., or with phenomena of forced and child labor.
- ensuring a safe working environment and in accordance with applicable safety standards.
- the adoption of practices for the protection of the environment, where it is encouraged to contribute to the reduction of greenhouse gas emissions and to promote environmental protection actions.

Fighting corruption in the supply chain

The Group takes into account the risk of involvement of any partner or supplier in corruption incidents and seeks to ensure maximum possible transparency through appropriate due diligence procedures during or at the beginning of any collaboration. More specifically, the Group mainly cooperates with multinational companies, which place particular emphasis on issues of transparency and the fight against corruption through rules and policies.

Human rights in the supply chain

[ATHEX ESG: C-S6]

The Group has adopted principles in order to avoid entering into cooperation with suppliers at high risk of human rights violations and it is committed to promote the continuous improvement of international human rights standards. The fact that the majority of the Group's suppliers operate in countries in the European Union and America, where labor laws are respected and there is awareness of human rights issues, as well as the high percentage of local suppliers, ensure to a significant extent that the risk of infringement of human rights is minimized, even though it is not possible to take action to identify cases of abuse throughout the supply chain. Employees of the Group have the option to utilize the reporting platform to report any violations. This includes cases that may lead to an increased risk of modern slavery or labor practices within the supply chain.

12.4.3 Outcomes of the aforementioned policies and non-financial performance indices

There have been no complaints of incidents of human rights violations in the supply chain that have emerged through the communication channels maintained by the Group (reporting platform, email, phone, mail, verbal). Additionally, the Group has not become aware of any related intent or behavior.

The following tables include information on the Group's supply chain, as well as on its companies' spending on local suppliers, based on the supplier's country of origin.

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

* *Companies within the Group act as suppliers to other companies within the Group and have been included in the above numerical data.Companies of the Group have as suppliers companies of the Group respectively and they have been included in the above figures.*

Amounts in thousand Euro, unless stated otherwise

Spending on local suppliers

[GRI: 204-1]

The following table displays the estimated monetary value of total payments to suppliers (€ million) and the percentage of spending on local suppliers:

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

12.5 Social and labor issues

12.5.1 Main risks and their management

The Group recognizes the risks related to labor issues in general and places great emphasis on them. It recognizes health and safety issues as one of the strategic risks it faces and implements measures to mitigate the risk of workplace accidents. It is committed to zero tolerance in health and safety matters and it has established and communicated relevant principles and policies. In relation to its products, it recognizes and seeks to eliminate the risk of harm to human life and health, taking measures to eliminate components or defects during their manufacture, disposal and use. Also, the Group recognizes the special situations and difficulties that exist in the local communities in which it operates, which may affect its social capital, while it recognizes its influence and places emphasis on the opportunities created for local communities by its activities.

12.5.2 Due Diligence and Other Policies

The Group places great emphasis on labor issues, such as workers' rights, ensuring health and safety in the workplace, training and education of employees. It also recognizes its influence and the opportunities created for local communities by its activities. The Group, through the ***Code of Ethics and Business Conduct***, recognizes that its human resources have a decisive role in its development and the achievement of its strategic goals. In this context, it encourages professional training, cooperation, initiative and well-being of its employees and provides a working environment of equal opportunities for all.

Hiring process

According to the ***Compensation and Personnel Management Procedure***, as well as the ***Procedure for Hiring Senior Executives,*** for the selection of new employees, the Group relies on objective criteria, excluding any possibility of discrimination due to race, religion, gender, nationality, beliefs, age, disability, etc. All hirings correspond to the real needs of the Group and are matched to specific 'job roles.' The completion of the hiring process involves collaboration between the respective Director/Supervisor and the Human Resources Department. At the same time, there is the opportunity for internal mobility of personnel in conjunction with the Group's needs. To fill new job positions, it is initially examined whether the specific position can be covered through the internal relocation process. Supporting local communities is part of the hiring culture, achieved by employing individuals from the local communities where the Group operates, as well as graduates from local educational institutions and universities.

Fair compensation and equal opportunities Framework

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

The Group has an ***Eligibility Policy for its Board Members*** and a R***emuneration Policy*** for the members of the Board of Directors and the Committees, as well as the top management, which define, on the one hand, the existing rights of the members of the Board of Directors and the Group's obligations towards them, and on the other hand, the conditions under which remuneration will be provided. These policies are published on the Group's Website. At the same time, the Group has a ***Payroll and Personnel Management Policy*** for employees. The level of fixed remuneration is determined in accordance with the principle of paying the most suitable and fair remuneration to the most suitable person, taking into account the level of competence, knowledge and experience required for the role, while there is no variable remuneration. At the same time, it is ensured that the long-term goals of the Group are served and it is sought the connection of professional development and remuneration with personal performance and goals' achievement.

Furthermore, the Group is committed through its ***Human Rights Policy*** to providing equal opportunities and prohibits discrimination of any kind. Employee recruitment and hiring procedures, access to training and development, performance evaluation, compensation, and all aspects of employees' professional lives are safeguarded against discrimination based on race, gender, color, national or social origin, religion, age, disability, sexual orientation, and political beliefs.

Training and development of employees

[ATHEX ESG: C-S5]

The Group has established ***Employee Evaluation*** and ***Employee Training Procedure***. It offers extensive professional training and education, aiming at the development of its employees, as the production methods used as well as the ever-changing technological environment require continuous training. Therefore, it actually contributes to the creation of value for human capital for its own benefit, but also for the benefit of society at large. The training of employees is carried out either internally or with the contribution of external consultants with high technical knowledge. In the context of the continuous development of employees and in matters of sustainable development, a special manual of sustainable development was created, which is adapted to each company of the Group with specific examples and is available to all employees through an internal online platform. In addition, in the context of strengthening the capability of the members of the Board of Directors in terms of managing Sustainable Development issues related to the corporate strategy, a two-day training seminar was organized.

The analysis of training needs constitutes an ongoing process and includes, among other things, the collection of data related to personnel development and evolving needs to meet the Group's functions, such as the following:

- Operational objectives and implementation needs of the strategy
- Needs based on the guiding principles of Senior Management
- Skill development in new technologies
- General market trends requiring training
- New regulatory and legislative frameworks requiring implementation
- New requirements from regulatory authorities
- Areas for improvement/development according to the personnel training plan and related needs

Training Platform

As part of the ongoing development of our employees, the ***"Thrace Academy" training platform*** has been created and is operational. This platform includes courses organized into sections such as policies and procedures, health, safety and environment, sustainable development, products and applications, and skill improvement.

Human resource platform

The ***human resource platform "HR Hub"*** is an online employee interaction system through which processes are automated and digitized, access to important workplace information is created, process waiting and processing time is reduced, and the possibility of error or omission is minimized.

Freedom to join labor unions and the right to collective negotiation

[GRI: 2-30, 407-1, ATHEX ESG: C-S7]

The Group respects the right of employees to participate in labor associations and unions. It consistently follows the ***Internal Rules of Operation***, which have been drawn up in collaboration with employee representatives and it has been submitted to the Labor Inspection office. The Regulation strengthens the smooth communication between the Management and the representatives of the employees, at regular intervals, with the aim of presenting the requests of the employees that are officially recorded, but also the more general discussion of issues related to the workplace and the health and safety of the employees.

Health, safety and environment protection

[GRI:403-1]

The safety and health of employees are pointed out as important issues for the Group, as the priority remains to ensure an environment that respects the daily struggle of all employees to remain creative and productive while also being healthy and safe. The basic practice of the Group is to ensure the health and safety of its employees, setting as a key strategic goal the minimization of the possibility of occupational accidents, as well as the occurrence of work-related illnesses. Also, the Group proceeded to the formation of a life and health safety program for employees. Protecting the health and safety of employees, consumers, customers and communities in all the areas in which it operates is a top priority for the Group. Under the ***Health-Safety-Environment (HSE) Policy*** of the Group, the functioning of facilities and the conduct of operations should comply with the legislation in force in each country in which they are based, as well as with the regulations and authorizations on safety, health and environment, including those relating to the control, transportation, storage and disposal of controlled or non-controlled materials.

Health, safety, environment Policy

The aim of Thrace Group's ***Health-Safety-Environment (HSE) Policy*** includes the following:

- Provision of guidance and establishment of a unified way for the administration of the Group's Safety-Health-Environment issues with reference to the general principles and the basic rules set by the Group's management.
- Assurance of safety and health in the working places for all Group personnel, collaborators and visitors.
- Avoidance of any possible damage in Thrace Group's property and personnel.
- Increase of the Group's personnel awareness in environmental aspects, environmentally friendly production processes and environmental protection.
- Improvement of the Group's culture with reference to Safety-Health-Environment topics

Measures related to safety and health

[GRI:403-2, 403-5]

Within the Group, the risks at work have been identified and assessed and the relevant corrective or preventive actions have been defined with the aim of eliminating them and minimizing the chances of causing an accident. The following actions and practices are indicative:

- Training and awareness of workers in the facilities on matters of health and safety at work, with a special emphasis on induction training, which includes the guidelines for safe work.
- Elaboration of risk studies in all facilities.
- Implementation of a security project, within the framework of which work groups have been set up per facility, which on a monthly basis list the risks they have identified and have faced,

are updated on issues related to security and take relevant actions.

- Raising employee awareness on health and safety issues, by placing messages and safety rules in central points of the facilities, providing clothing with the corresponding messages, etc.
- Recording and investigating cases involving accidents or incidents, where employees are encouraged to confidentially report any unsafe practices or hazards they encounter at work.
- Determination of responsibilities for health and safety tasks by the Director of each facility in collaboration with the Safety Technician and Occupational Physician.
- Systematic monitoring of production processes, machinery and equipment to ensure they are safe and in good condition.
- First aid boxes, defibrillators and fire extinguishers are readily available, escape exits are clearly marked and clear of obstructions.
- Maintain and cleaning of work area in order to ensure clean and comfortable conditions, including appropriate temperature, ventilation and lighting.
- Use of quality, environmental, health and safety management software to record incidents of non-compliance with these matters.
- Voluntary training and certification of employees in first aid.

Appropriate use of safety equipment

The Group ensures that all employees are provided with the equipment required for the safe performance of their duties, as well as that they receive the necessary information on the proper use of the equipment and the risks associated with their work. The Group's primary concern is to provide all the prescribed Personal Protective Equipment to its employees.

Facility safety

The Group implements facility safety measures by conducting regular risk assessments, which are submitted when requested to labor inspectors and certification bodies in order to confirm that the measures applied are proportionate to the security risk and in accordance with current legislation. Additionally, Emergency Response Plans have developed which are regularly monitored and proactive or corrective measures are taken. At the same time, responsible individuals have been appointed to contribute to the safety of the facilities, such as a safety technician, maintenance supervisor, health and safety officer, environmental officer, while appropriate training is provided to all employees.

Prevention and avoidance of any kind of injury

The Group monitors and records incidents related to safety in its facilities, identifies potential hazards, assesses emerging risks, and implements corrective actions as measures to reduce accidents. Additionally, it conducts an assessment of the effectiveness of corrective actions and the recurrence of incidents.

Ensuring product quality, customer health and safety

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

The Group's main priority is to offer innovative-sustainable products and integrated solutions that adapt to the needs and requirements of customers and reflect its vision in relation to product quality and customer safety. In this context, as reflected in the ***Code of Ethics and Business Conduct,*** the Group complies with the respective national legislations and adopts international standards, safety rules, and best practices regarding the design and production of products in all its facilities. It monitors compliance with all specifications through regular quality controls, including those related to the health and safety of customers and end-users. Products are inspected at all stages of the production process, and management systems and procedures have been adopted according to various international standards to ensure quality assurance. The Group has adopted Quality Management Systems based on international food safety standards such as ISO 22000, ISO 9001, IFS, BRC; FDA, HALAL, and implements relevant procedures regarding the production of packages that come into direct contact with food. Similarly, in the production of masks, the Group focuses particularly on ensuring the health and safety of end users and implements required procedures.

Quality management procedures

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

- Control of raw materials: Evaluation of raw materials with trial production of a product and comparison in the laboratory with corresponding products.
- Product control: Control of products in all phases of production, such as dimensional control, control of mechanical properties based on international standards, product harmonization with its specifications and customer requirements.
- Control of transport packaging: Using packaging based on the technical specifications of the products to ensure smooth and safe transport and carrying out during loading visual quality checks for suitability and implementing scanning systems that ensure that only approved products are loaded.
- Customer satisfaction assessment: Direct (through sales departments) or indirect (through surveys) communication with customers aimed at optimizing the services provided.

Promote transparency of product details and information of customers

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

Product quality and customer safety are top priorities for the Group. In this context, the Group conforms to the national laws in force from time to time and adopts standards, safety rules and best practices regarding the design and manufacture of products in all its facilities and uses regular quality controls to verify that all specifications are complied with, including those relating to the health and safety of customers and end users. The products are subject to control across all stages of the production process, and the Group has adopted management systems and procedures according to various international standards (BRC, ISO 22000 and 9001, FDA and IFS, etc.) to ensure quality and customer service. Furthermore, through specific labeling, information on the label or technical documents, the end-user is informed about the technical characteristics and performance of the products according to their type.

Local communities and social contribution

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

The Group seeks, through its business activities, to achieve high performance, in order to produce and distribute direct or indirect economic value to the society in which it operates, with particular emphasis:

- on strengthening the economies of the countries in which it operates, through the cash flows it generates towards its stakeholders, namely tax payments, payments to suppliers, payment of employer contributions, payroll payments to employees, dividends to shareholders and investments in local communities,
- on the employment, through the direct and indirect creation and maintenance of jobs throughout the value chain.

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

- Contributes to the work of organizations with recognized action in addressing social issues by supporting programs of social solidarity and education.
- Makes donations to support vulnerable social groups.
- Has been supporting the ActionAid Adoption Program since 2016, assisting 16 children in need.
- Develops initiatives to reduce food waste by participating in the "Saving and Offering Food" network through the non-profit organization "Boroume", supporting social organizations throughout Greece. According to official data, the total food offered by Thrace Greenhouses in 2023 corresponds to 11,835 servings of food.
- Supports the operation of the Stavros Chaliotis Social Center.

Stavros Chalioris Social Center

The Social Center STAVROS CHALIORIS is an Urban Non-Profit Company located in the Local Community of Magico Municipality of Abdera, Xanthi Regional Unit and it has been operating since 2010. It is named after the late Stavros Chalioris, founder and President of Thrace Group who envisioned its creation.

The aim of the Social Center operation is its practical contribution to society with educational, cultural, recreational and social activities, which are addressed at both children and adults with a regular training program which accommodates approximately 250 people per training period each year. The contemporary influences of climate change at the global level impose the choice of actions that concern the awareness of local communities and children in matters of ecology, renewable energy sources and biodiversity conservation.

At the same time the Social Center organizes events, celebrations and excursions for its members with educational and entertainment content, children's cinema screenings, conferences on medical issues, social and educational workshops in collaboration with local agencies and scientific collaborators. In the actions of the Social Center are included the support of actions of the Group's Employees Union, granting of scholarships and financial aid to children in the area who wish to study and are unable to afford their studies, financial support and coverage of treatment / hospitalization expenses for needy patients in the area as well as donations of personal protective equipment and medical equipment. In addition, in the area of the Social Center there is a doctor's office for the provision of primary health care to the residents of the wider area and the meetings of KAPI Magiko take place.

12.5.3 *Outcomes of the aforementioned policies and non-financial performance indices*

PERCENTAGE OF EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS

Thrace Plastics Co S.A.	100%
Thrace Nonwovens & Geosynthetics SA	
Thrace Polyfilms SA	
Thrace Eurobent SA	
Thrace Pack SA	
Thrace Greenhouse S.A.	
Thrace Greiner Packaging SRL	99%
Don & Low Ltd	80%
Thrace Synthetic Packaging Ltd	10%
Thrace Ipoma SA	0%
Lumite Inc	
Thrace Polybulk AB	
Thrace Polybulk AS	
Thrace Plastics Packaging DOO	

TOTAL NUMBER OF EMPLOYEES BY TYPE OF EMPLOYMENT CONTRACT

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

Amounts in thousand Euro, unless stated otherwise

TOTAL NUMBER OF EMPLOYEES BY TYPE OF EMPLOYMENT

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

EMPLOYEE TURNOVER

[ATHEX ESG: C-S4]

The indicators refer to the percentage of redundancies from the Group

	2023	2022	2021
Voluntary turnover rate	12%	11%	11%
Non-voluntary turnover rate	9%	8%	10%

FEMALE EMPLOYEES

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

	2023	2022	2021
Percentage of women	22%	21%	23%
Female employees in managerial positions	17%	16%	18%

	2023	2022	2021
Percentage of women in the Board of Directors*	18%	18%	18%

** Meeting the criteria for adequate representation as defined in Article 3 of L.4706/2020*

INJURIES AT WORK

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

	Employees		
	2023	2022	2021
Number of work-related fatalities	0	0	0
Number of recordable injuries	41	47***	35
Accident frequency rate*	2.17	2.45	1.89
Accident severity rate**	34.15	30.97	33.53

* *Equals to the number of recordable injuries*200.000/hours worked*

** *Equals to the number of workdays lost*200.000/hours worked*

*** *The information has been updated*

Amounts in thousand Euro, unless stated otherwise

ILLNESS AT WORK

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

	Employees			Partners		
	2023	2022	2021	2023	2022	2021
Number of deaths due to illness	0	0	0	0	0	0
Number of confirmed illnesses	0	0	0	0	0	0

PRODUCT SAFETY AND HEALTH AND SAFETY OF CONSUMERS AND END USERS

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

In 2023, there were no cases of non-compliance with the applicable legislation and regulations regarding the impacts of products on the health and safety of end users, necessitating a product recall for which financial compensation was required

SOCIAL SUPPORT THROUGH STAVROS CHALIORIS SOCIAL CENTER

	2023	2022	2021
Expenditures (€)	410,131	412,621	380,017

12.6 Environmental issues and climate change

12.6.1 Main risks and their management

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

For the identification of opportunities, as well as natural and transitional risks associated with climate change, the Group takes also into account the recommendations of the Financial Stability Board's Task Force on Climate-Related Financial Disclosures (TCFD). The climate crisis and the energy transition affect the Group's activities while simultaneously creating great opportunities through the principles of the circular economy, the use of recycled raw materials, and investment in renewable energy sources.

Additionally, the Group recognizes the risks and impacts that may arise in its business activities due to climate change, such as extreme weather events or temperature increases, which could affect production in the short, medium, and long term. To mitigate risks and avoid negative socio-economic and environmental impacts, the Group stays informed, monitors international developments, and adjusts its business model accordingly. It has identified categories of risks related to climate change, as well as transition opportunities to a low-carbon emissions business model with an emphasis on innovation. These risks and opportunities have been considered in formulating the sustainable development strategy and defining objectives and actions.

Amounts in thousand Euro, unless stated otherwise

Type:	Risks associated with:	The Group:
Institutional framework	the continuous changes in the European and national regulatory framework that create future requirements.	monitors the national and international regulatory framework concerning the environment, particularly in the technical textiles and packaging sectors, regarding waste management, recycling, the use of secondary raw materials, and the sustainable characteristics of products.
Technology	the fact that the transition to a low-carbon economy entails requirements for adapting production processes.	monitors technological advancements that can enhance innovation and optimize production processes. It also identifies potential risks in its internal processes, such as the need to modernize production equipment, in order to make timely investments.
Market	changes in industry structure in a carbon sensitive economy model.	Assesses the environmental risk related to inadequate and non-transparent carbon emission reporting and records direct and indirect emissions associated with its operations and value chain.
Reputation	the variations in consumer preferences	acknowledges the transitional risks associated with changes in consumer preferences by providing sustainable solutions with confirmed positive environmental impact through life cycle assessments (LCAs)

Type:	Opportunities arising:	The Group:
Energy sources	from the increase in the use of renewable sources and the effort to gradually reduce energy consumption.	invests in photovoltaic systems and geothermal energy so as to reduce greenhouse gas emissions through the use of RES, and continuously takes measurable actions to save energy.
Markets	from the conversion of existing markets to new sustainable products and processes, where the use of recycled or re-use will add value to the customer.	has developed specialized upgrading recycling systems that also enable the recording and certification of the percentage of recycled raw material or reuse systems that enable the recording and certification of the number of uses.
Products and services	from the development of products and solutions based on the circular economy that add value to the customer.	applies the circular economy model in practice, through specific actions, such as the organization of closed recycling systems for the production of new products or the design and production of reusable products aimed at leading in new markets for innovative, environmentally designed products

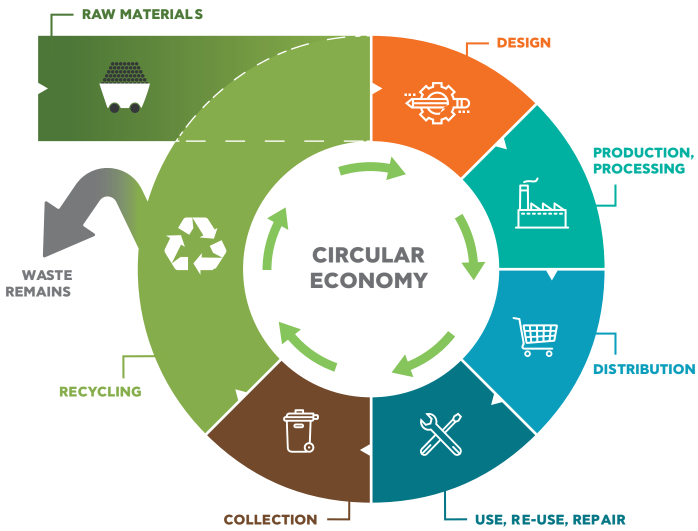
Type:	Opportunities arising:	The Group:
Elasticity	from the execution of projects aimed at improving efficiency during the production process.	carries out targeted projects such as zero pellet loss, energy efficiency in the production process, waste minimization, re-use of production process waste (scrap).
Resource efficiency	from increasing the use of recycled raw material.	has set as a priority the replacement of primary raw material with recycled, the synergies with suppliers/customers in the context of creating a sustainable supply chain, the reduction of product packaging where possible, and the continuous monitoring of the efficiency of production lines.

12.6.2 Due Diligence and Other Policies

The Group has a Health-Safety-Environment Policy with the aim of a consistent approach, raising awareness and improving the culture in relation to the general principles and basic rules included in the Code of Ethical Behavior and Ethics and concerning safety and health, the protection of environment, circular economy and climate change. The priority is to improve the environmental impacts resulting from the operation of the Group, with particular attention to the application of circular economy principles, responsible waste management, increasing the use of recycled raw materials, reducing energy consumption, investing in renewable energy sources and limiting greenhouse gas emissions related to its activities.

Actions according to the principles of the circular economy

The European Green Deal lays the foundations for a new plastics economy, in which the design and production of plastic products are done with full respect for the environment through the use of fewer natural resources and increased recycling. The Group fully responds to this strategy, turning today's challenges into growth opportunities with the aim of strengthening a sustainable competitive advantage. In this context, it has adopted the principles of the circular economy throughout the life cycle of its products, incorporating practices based on the principles of reduction, reuse and recycling.



Raw materials

[ATHEX ESG: SS-E7]

- Ensuring efficient use of natural resources and evaluation of raw materials based on the required technical specifications

- Deliberate non-use during the production process of the 27 critical raw materials for which there is a high risk of supply problems as recognized by the European Commission

Design

- Reducing the average weight of the products while maintaining the same technical characteristics
- Designing new innovative and sustainable products with a low environmental footprint

Production

- Investment in more energy efficient production machines and continuous monitoring and reduction of energy consumption
- Use of recycled raw material in a very high percentage depending on the application

Distribution / Transportation

- Synergies between Group companies for the optimization of routes and procurement of raw materials from industries located in the same geographical area on a priority basis
- Collaboration with customers aiming to reduce the use of secondary packaging

Reuse

- Saving of raw materials through the reuse of internal waste
- Production of reusable products with the aim of extending their life cycle as much as possible

Collection

- Storage of production residues in appropriate temporary storage stations with the aim of their optimal utilization
- Collection of recyclable materials through closed systems with the aim of upgrading recycling

Recycling

- Voluntary commitment to the Circular Plastics Alliance (CPA) initiative to replace virgin raw materials with recycled materials by 2025
- Reliable information on traceability and content of recycled raw material through RecyClass, EuCertPlus and TUV OK Recycled certifications

Waste

- Recycling of non-reusable raw materials through licensed partners
- Continued reduction of non-hazardous waste disposal in landfills through source separation actions

Research and innovation for the development of sustainable products

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

The Group constantly invests in research and innovation mainly during the design phase with the aim of developing sustainable products fully in line with the European strategy for plastics in a circular economy, with a positive environmental impact and contribution to mitigating climate change. Priority in the design and the production is the low environmental footprint, the lowest possible weight while achieving the same strength, high recyclability, mono-material usage, incorporation of natural materials, and the use of recycled material up to 100%.

Many of the Group's products replace the raw material with recycled, while at the same time maintaining their properties and being certified by RecyClass, an international initiative that promotes the recyclability of plastic packaging and ensures the traceability and transparency of recycled plastic. The Group has carried out EPD® (Environmental Product Declaration) environmental assessments for specific, representative types of products in all three segments of its activity. Both the assessments, and the corresponding Life Cycle Assessments (LCA for short) carried out within the above context, were prepared based on an internationally established and accepted methodology for the product categories in question (ISO 14025 and ISO 14040), certified by independent auditing body for their validity and are available in the prescribed database (The International EPD System) of the organization EPD International AB (based in Sweden).

2025 TARGET

30%

INCREASE IN THE USE OF RECYCLED RAW MATERIALS COMPARED TO 2021

Circular economy platform "In the Loop"

[GRI: 306-2, ATHEX ESG: SS-E5]

The environmentally targeted ***Circular Economy platform "In the Loop"*** of the Thrace Group is based on the 3 axes of the circular economy REDUCE | REUSE | RECYCLE and networks companies, brands, public bodies and consumers with the aim of reducing the environmental footprint throughout the whole value chain. It enumerates over 200 collaborating members and reflects the Group's approach regarding the environmental impact of packaging materials and the avoidance of their disposal in the environment. The platform contributes to the creation of lighter products with the aim of reducing the use of plastic while maintaining the same technical characteristics, multi-use products that replace their single-use counterparts and products from recycled raw material. It also designs specialized reuse systems that enable recording and certification of the number of uses and specialized closed/controlled cycle recycling systems. In addition, it informs about the circular economy in plastic products and the upgrading recycling.

The benefits of using the platform are as follows:

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

Protection and preservation of biodiversity

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

The Group continuously seeks to increase the use of recycled raw material, drastically reduce waste and reduce greenhouse gas emissions through production processes, thereby reducing pressures on biodiversity. The circular economy-oriented strategy that it applies, aims to keep materials as much as possible in the economy cycle through reuse or recycling and certainly away from the environment, landfills and oceans, thus mitigating negative impacts on biodiversity throughout the value chain. The Biodiversity Strategy also works alongside the new European Strategy from "the farm to the plate" for the support and transition to fully sustainable agriculture. The Group, through Thrace Greenhouse fully supports this strategy for healthier, fresher and more sustainable food. Hydroponics allows the minimization of the use of plant protection products with the ultimate goal of their zero application and great water savings, while geothermal energy contributes to energy savings and almost zero greenhouse gas emissions.

Water consumption management

[ATHEX ESG: SS-E3, SS-E4]

Measures that can be implemented in facilities for the conservation and rational use of water, as well as the limitation of leaks.

- Water consumption monitoring
- Preventive maintenance on cooling/heating systems to address any potential leaks that may arise
- Water collection and recycling systems
- Automatic switches at the points of use of drinking water
- Special marking for rational use of drinking water
- Personnel awareness to reduce consumption

Liquid waste management

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

The Group fully complies with the legal requirements for the management of liquid waste. In this context, there are contracts with specialized management companies for their optimal management.

Solid waste management

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

The Group fully complies with the legal requirements for waste management. In this context, an environmental impact study has been prepared which mainly concerns the optimal way of managing them, while meeting contractual obligations, such as registration in the Electronic Waste Register (EWR) and registration of the waste producer's annual report, and registration in the National Register of Waste Producers (NRWP) and payment of the relevant packaging recycling fee. The Group implements internal procedures, such as the preparation of reports on the types and quantities of waste produced, while an effort is made to reduce this in the factories by the method of separation at the source. It is also ensured that the companies to which the waste ends up for final treatment or disposal have valid legal operating documents, while the relevant recycling certificates are obtained.

2025 TARGET

40%
REDUCTION OF SOLID WASTE TO LANDFILL COMPARED TO 2021

Use and management of chemicals

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

Due to its field of activity, the Group uses a range of chemical substances and constitutes a very important priority the effective management of the potential risks that may arise for the environment. The Group fully complies with legal requirements for the temporary storage and use of chemicals, informs and trains employees about their safe use and does not use chemicals or other hazardous substances subject to national or international bans. In addition, all the chemicals used are placed on metal bases, while any leaks of small quantities end up in special collectors. All chemicals are stored in appropriate areas with special markings, while access is only allowed to persons with special permission and extensive knowledge of safety regulations.

Improving resource efficiency during the production process

The efficiency of resources and processes is embedded in the Group's corporate culture. There are actively related projects in the facilities being implemented with the contribution of employees, while their progress is recorded and evaluated on a systematic basis, such as zero pellet loss and zero waste to landfill.

Improving energy efficiency during the production process

[GRI: 302-3]

The Group constantly monitors the energy consumption in the production processes with the aim of the best possible efficiency through taking energy saving measures and raising awareness and informing the employees. At the same time, it makes mechanical modernization investments aimed at saving energy, such as the replacement of energy-consuming equipment with equipment with lower energy requirements.

2025 TARGET

10%

OF THE ENERGY CONSUMPTION WILL BE SELF-GENERATED FROM RENEWABLE SOURCES in accordance with the levels of current productivity

Investment in renewable energy sources

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

ANNUAL PERFORMANCE

10.8 MW

POWER OF PHOTOVOLTAIC SYSTEMS

6.7 MW in 2022

Actions related to climate-related issues

[ATHEX ESG: SS-E1]

The Group has incorporated into its strategic plan the improvement of the data collection process for the accurate calculation and measurement of emissions and has committed to establishing science-based reduction targets and validating them through the international Science Based Targets Initiative (SBTi). Concurrently, it implements actions for energy conservation, optimal waste management, and increased use of recycled raw materials. These actions formed the basis for setting specific targets. To maximize business opportunities and mitigate risks arising from climate change, the Group bases its business model on a comprehensive risk assessment process, examining strengths and weaknesses, as well as opportunities and threats from the environment through SWOT analysis. Additionally, the Group participates in the international organization CDP to assess how it manages the environmental impacts and climate change effects of its activities. In order to promptly respond to climate change risks and opportunities, all Group companies follow a common approach, while environmental management responsibilities have been assigned to monitor the companies' performance.

The Group recognizes the importance of recording and reducing direct and indirect greenhouse gas emissions. For this reason, it utilizes a specialized ***Carbon Footprint Calculation Platform***, aligned with internationally recognized GHG Protocol methodology and ISO 14064-3. In 2021, the Group proceeded with the recording of direct and indirect emissions (Scope 1 and 2) for the previous year and identified the carbon footprint of its three major subsidiaries. Since 2022, the Group has been capturing full records of direct and indirect emissions (Scope 1, 2, and 3) and identifying the carbon footprint of all subsidiary companies.

As mentioned in the "Approach to Sustainable Development > Strategy" section, the Group has outlined specific actions in the Strategic Sustainable Development Plan 2022-2026 aimed at reducing greenhouse gas emissions in all processes, improving the environmental impact of products, and implementing circular economy projects. Prioritizing remains the reduction of energy consumption in production processes, the use of energy from renewable sources, maintaining the use of recycled raw materials at stable levels, and reducing waste destined for landfill.

12.6.3 Outcomes of the aforementioned policies and non-financial performance indices

Raw materials

The purpose of the monitoring framework is to measure progress towards the transition to a circular economy regarding the procurement of raw materials in relation to recyclable raw materials. In 2023, the Group stabilized the use of recycled raw materials at high levels while continuously upgrading its quality to enable its use in productions with demanding technical specifications.

ANNUAL PERFORMANCE

12.9

THOUSAND TONS

USE OF RECYCLED RAW MATERIAL IN 2023

Total weight of raw materials (in t)

[GRI: 301-1]

	2023	2022	2021
Polypropylene	92,800	85,610	90,366
Polyethylene	9,026	10,568	10,856
PET/ Polystyrene	421	384	0
Masterbatch	3,911	2,908	2,040
Paper	1,662	0	0
Total	**107,820**	**99,470**	**103,262**

Total weight of recycled raw materials (in t)

[GRI: 301-2]

	2023	2022	2021
Recycled raw material*	**12,976**	**13,407**	**11,443**
Percentage of recycled raw material**	10.7%	11.9%	9.4%

* *The recycled raw materials included into the production process stem from residues of the production processes and from external sources.*

** *Packaging materials are not included in the calculation.*

Total weight of packaging materials (in t)

	2023	2022	2021
Packaging materials	**7,109**	**6,938**	**7,059**

Solid waste

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

Regarding the management of solid waste, the following table includes data for the quantities of waste generated in the Group, by treatment method. It must be noted that that the quantities of plastic production residues generated within the production units are recycled in full through in the production process.

Waste treatment method	Total weight of hazardous waste (t)			Percentage		
	2023	2022	2021	2023	2022	2021
Recycling	179.3	205.7	177.8	83.6%	91.9%	81.6%
Energy recovery	15.2	4.8	18.9	7.1%	2.1%	8.7%
Incineration	19.9	13.4	21.1	9.3%	6.0%	9.7%
Total	**214.4**	**223.9**	**217.8**	**100%**	**100%**	**100%**

Amounts in thousand Euro, unless stated otherwise

Waste treatment method	Total weight of non-hazardous waste (t)			Percentage		
	2023	2022	2021	2023	2022	2021
Recycling	3,108.8	3,456.7	2,201.8	67.5%	65.3%	50.5%
Energy recovery	304.7	314.6	362.4	6.6%	5.9%	8.3%
Disposal in landfills	1,190.8	1,519.9	1,794.9	25.9%	28.7%	41.2%
Total	**4,604.3**	**5,291.2**	**4,359.1**	**100%**	**100%**	**100%**

**The information has been updated.*

ANNUAL PERFORMANCE

-12.6%
REDUCION OF TOTAL WASTE IN 2023

-21.7%
REDUCTION OF WASTE TO LANDFILL IN 2023

Energy consumption by type and source (MJ)*

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

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

* *To calculate electricity, district heating and fuel consumption, unit conversion factors from the DEFRA (Department for Environment, Food & Rural Affairs) methodology guide were used. The previous years' data were updated to reflect more accurate information.*

** *There was less need for heating, and therefore, consumption decreased.*

Amounts in thousand Euro, unless stated otherwise

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

	2023	2022	2021
Electric energy (%)	76.7%	78.0%	80.2%
Thermal energy (%)	0.2%	0.2%	0.2%
Fuel (%)	15.3%	15.2%	15.8%
Renewable energy sources (%)	7.8%	6.6%	3.8%
Total	**100%**	**100%**	**100%**

ANNUAL PERFORMANCE

7.8%

USE OF ENERGY FROM RENEWABLE SOURCES IN 2023

Direct and indirect emissions

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

The data collected based on ISO 14064-3 for the year 2022, encompassing a full analysis of scopes 1, 2, and 3, is as follows.

Through a specialized platform, which aligns with the GHG Protocol methodology and ISO 14064-3, the collection of required data for each category (scope 1, 2, 3) is achieved, data conversion into CO_2 emissions, identification of significant improvement points, taking measures to reduce emissions, and monitoring progress.

In the Sustainable Development Report to be published for the year 2023, there will be a detailed report on direct and indirect emissions with external verification.

Total emissions (tCO_2e)

	2022	2021
Direct emissions (Scope 1)	5,253	5,676
Indirect emissions (Scope 2)	52,884	54,966
Indirect emissions related to value chain (Scope 3)	294,376	303,261
Total	**352,513**	**363,903**

12.7 Impact of the COVID-19 pandemic on non-financial issues

The impact of the pandemic on the operation of the Group and business continuity

Amounts in thousand Euro, unless stated otherwise

In 2022, the Group managed to achieve stable, sustainable, but also significantly higher recurring profitability compared to pre-pandemic levels, despite the particularly difficult conditions that prevailed in the global economy. The foundations were laid for long-term improvement and development, within conditions of intense uncertainty and inflationary pressures, while the implementation of both the planned and the extraordinary investment plan progressed consistently. The dynamic growth path of the Group continues, aiming at the further increase of production volume, the continuous improvement of the product mix and profitability, as well as the strengthening of the dynamics at the level of recycling within the framework of sustainable development.

Measures taken for the minimization of the impact of the pandemic

The Group responsibly monitors developments related to the pandemic crisis, prioritizing the safeguarding of the health and safety of employees and the uninterrupted operation thereof, so as not to suffer any consequence that would negatively affect its business continuity. In accordance with the guidelines and recommendations of the World Health Organization and local Public Health and Civil Protection Organizations, all prescribed measures have been implemented from the outset and, if required, all envisaged measures will be activated.

12.8 Taxonomy Report

[ATHEX ESG: A-S1]

12.8.1 Environment

EU Commission aims to provide the economic and financial system in the EU with a structure that is more sustainable. For this reason, EU adopted the recommendations of the high-level expert group on sustainable finance that formed the basis of the "Action Plan on sustainable finance". Moreover, climate neutrality by 2050 is a priority of the European Green Deal. By this term, the volume of CO_2 emissions emitted should be equal to the volume avoided or removed. EU Taxonomy Regulation is the basic tool in the aforementioned Action Plan. It is a system that classifies environmentally sustainable economic activities. All environmental objectives are examined:

1. Climate Change Mitigation
2. Climate Change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

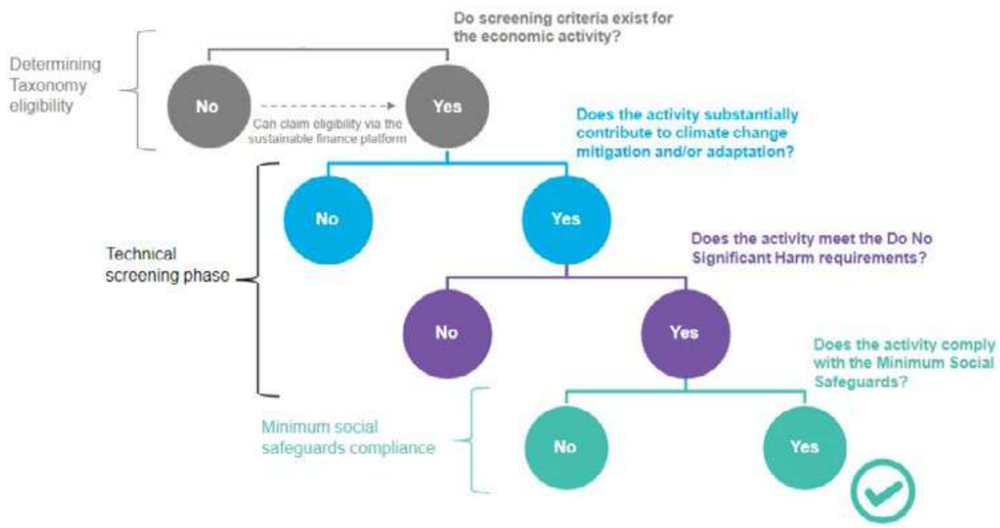
EU Taxonomy Regulation classifies economic activities as "environmentally sustainable" under the following conditions:

- Make a substantial contribution to at least one of the environmental objectives.
- Do no significant harm (DNSH) any of the rest five environmental objectives.
- Comply with the minimum social safeguards.

Technical Screening Criteria (TSC) are used for the assessment of an economic activity to the extent of the substantial contribution to one of the objectives and does no significant harm to the five other objectives.

The following figure presents the necessary steps for the alignment of an economic activity.

A 4-step process to determine a taxonomy aligned activity (Source: BNEF)



Delegated Regulation (EU) 2023/2486 for the environment was issued in June 2023 and Delegated Regulation (EU) 2021/2139 for the climate was amended from Reg. (EU) 2023/2486. Technical Screening Criteria have now been issued for all environmental objectives in order to evaluate the economic activities for the fiscal year 2023. The Group's economic activities were evaluated for the above-mentioned Technical Screening Criteria.

- "**Taxonomy eligible** economic activity" is described in the delegated acts supplementing Taxonomy Regulation, irrespective of whether the economic activity meets any or all the TSC laid down in those delegated acts.
- "**Taxonomy aligned** economic activity" complies with the TSC as defined in the Climate and Environment Delegated Acts and it is carried out in compliance with the minimum safeguards, re: human and consumer rights, anti-corruption and bribery, taxation and fair competition.

Turnover Key Performance Indicator (KPI), Capital Expenditure (CapEx) KPI and Operating Expenditure (OpEx) KPI will be reported for Thrace Group's economic activities in fiscal year 2023.

The Group's economic activities **3.6 "Production of other low carbon technologies"** and **1.1 "Manufacture of plastic packaging goods"** considered eligible. For the environmental objective of Climate Change Adaptation, the description of 3.6 includes the construction of technologies aimed at significant savings in Greenhouse Gas (GHG) emissions in other sectors of the economy (not covered in points 3.1 to 3.5 of Annex II, of the Delegated Act for Climate). Correspondingly, for the environmental objective of transitioning to a Circular Economy, the description of 1.1 includes the manufacture of plastic packaging goods.

Taxonomy Eligibility – Taxonomy Alignment

The EU Taxonomy Regulation does not stipulate a minimum value for the KPI levels. Building on technological advances rather than on efficiency enhancements within the existing system could be the purpose and objective of the "EU Action Plan on Financing Sustainable Growth".

Thrace Group aims in manufacturing sustainable products, aligned with Circular Economy standards, to further reduce the environmental footprint. Considering how they contribute to or support the environmental objectives, economic activities are categorized as:

- *Primary Activities*, which directly contribute substantially to one of the six environmental objectives.
- *Transitional activities*, which support the transition to a climate-neutral economy[1] .
- *Enabling activities*, which facilitate the primary activities indirectly[2] .

Economic activities

Thrace Group consists of 14 companies, operates in 9 countries, with production, trading and distribution companies and develops activity in 3 sectors: Technical fabrics, Packaging solutions and Geothermal Hydroponic Greenhouses. Moreover, it develops sales networks in 80 countries, applies 28 technologies in production procedure and covers 25 market segments with products and solutions.

The Group's economic activities were assessed in order to determine which are eligible and which aligned according to Delegated Regulations for the Climate and the Environment. For this assessment, the relevant Technical Screening Criteria were taken into account.

The following table presents economic activities of the Group that are EU Taxonomy eligible the environmental objective for which the activities qualify as eligible.

Taxonomy eligible economic activity			
Economic Activity according to EU Taxonomy	**Description**	**NACE-code**	**Environmental objective**
3.6 Manufacture of other low carbon technologies	Manufacture (and sale) of technical fabrics (textiles, woven, non-woven) that aim at enabling a substantial reduction of GHG emissions in other sectors of the economy	13.20 13.95	Climate Change Adaptation
1.1 Manufacture of plastic packaging goods	Manufacture of plastic packaging goods	22.22	Transition to a Circular Economy

Eligibility verification of Thrace Group economic activities

According to the Delegated Regulation EU 2021/ 2139, the economic activity: **3.6. Manufacture of other low carbon technologies** can be associated with Thrace Group's economic activity: Production of Technical Fabrics. The aforementioned economic activity is categorized eligible, since a series of products that are being produced have Environmental Product Declaration (EPD), which essentially

1 *as referred to in Article 10(2) of Regulation (EU) 2020/852)*

2 *as referred to in Article 10(1), point (i), of https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32020R0852)*

Amounts in thousand Euro, unless stated otherwise

presents the reduction of greenhouse gas emissions over their life cycle, while simultaneously allows the comparison of products in order to select the most sustainable option.

According to the Delegated Regulation EU 2023/ 2486, the economic activity: **1.1 Manufacture of plastic packaging goods** can be directly associated with Thrace Group's NACE code 22.22: Manufacture of plastic packaging goods. The aforementioned NACE code is clearly included in the Del. Reg. EU 2023/ 2486 and therefore is categorized eligible.

The rest of Group's economic activities are not classified as eligible, as they are not currently included in the Delegated act for climate or in its amendment, and in the Delegated act for the environment. Economic Activities of Hydroponic Greenhouses Geothermal are in this category.

Economic activity 3.6 is defined as Enabling Activity, as it meets the Technical Screening Criteria defined in the corresponding section of the Delegated Regulation for Climate, as applicable. Activity 1.1 is defined as Main Activity as the manufacturing of plastic packaging goods substantially contributes to the transition to a circular economy.

<u>Alignment verification of the Group's eligible economic activities</u>

Subsequently, the alignment of the eligible activities of the group identified in the previous stage is evaluated.

3.6. Manufacture of other low carbon technologies

The Group's economic activity in the field of Technical Fabrics production s**ubstantially contributes** to the environmental objective of **Climate Change Adaptation,** as the Technical Fabrics have been designed and are mainly used for the prevention of soil erosion and thermal stress by improving the energy efficiency of buildings. Moreover, they provide adaptation solutions that substantially contribute to the prevention or reduction of the risk of negative impact of existing and expected future climate conditions on people, nature, or assets, without increasing the risk of negative effects on other people, nature, or assets.

The economic activity was examined for its contribution to Climate Change Adaptation based on the criteria defined in Article 11 of the Taxonomy Regulation and the Technical Screening Criteria (TSC) of the Delegated Act for Climate. For the determination of the risks of climate change, Thrace Plastics Group has initiated its alignment with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). The TCFD Report divides climate-related risks into two major categories:

- Risks related to the physical impacts of climate change and (Climate Change Physical Risk).
- Risks related to the transition to a lower-carbon economy (Climate Change Transition Risk).

The classification of Climate-related hazards comprises four major hazard groups, with hazards related to water, temperature, wind, and solid mass according to Appendix A of the Climate Delegated Act. In this context, the assessment of climate risks and the vulnerability of the Group's activities is ongoing. However, it is noted that the Group has and implements an Emergency Response Plan (ERP) which records all the preventive measures that have been taken to minimize the risk from Fire, Heatwave, intense snowfall/frost, stormy winds, thunderstorms, and floods.

Compliance with *"do not significant harm, DNSH"* criteria for economic activity **3.6** is being evaluated in the following paragraphs.

The criteria for the EU environmental objective for the use and protection of **Water and Marine resources** are associated with environmental degradation risks related to preserving water quality and avoiding water stress. Their identification and management are achieved by attaining good water status and good ecological potential, in accordance with Directive 2000/ 60/EC.

The Group has adopted several procedures to this direction and a series of measures are in place, such as i) water consumption monitoring, ii) integrated proactive maintenance system to deal with possible leaks, iii) water collection and recycling systems, iv) automatic switches at drinking water points, etc.

DNSH criteria for **Circular Economy** examine the assessment of the activity and, where feasible, the adaptation of techniques that support:

i) Reuse and use of secondary raw material.

ii) Design for high durability and recyclability.

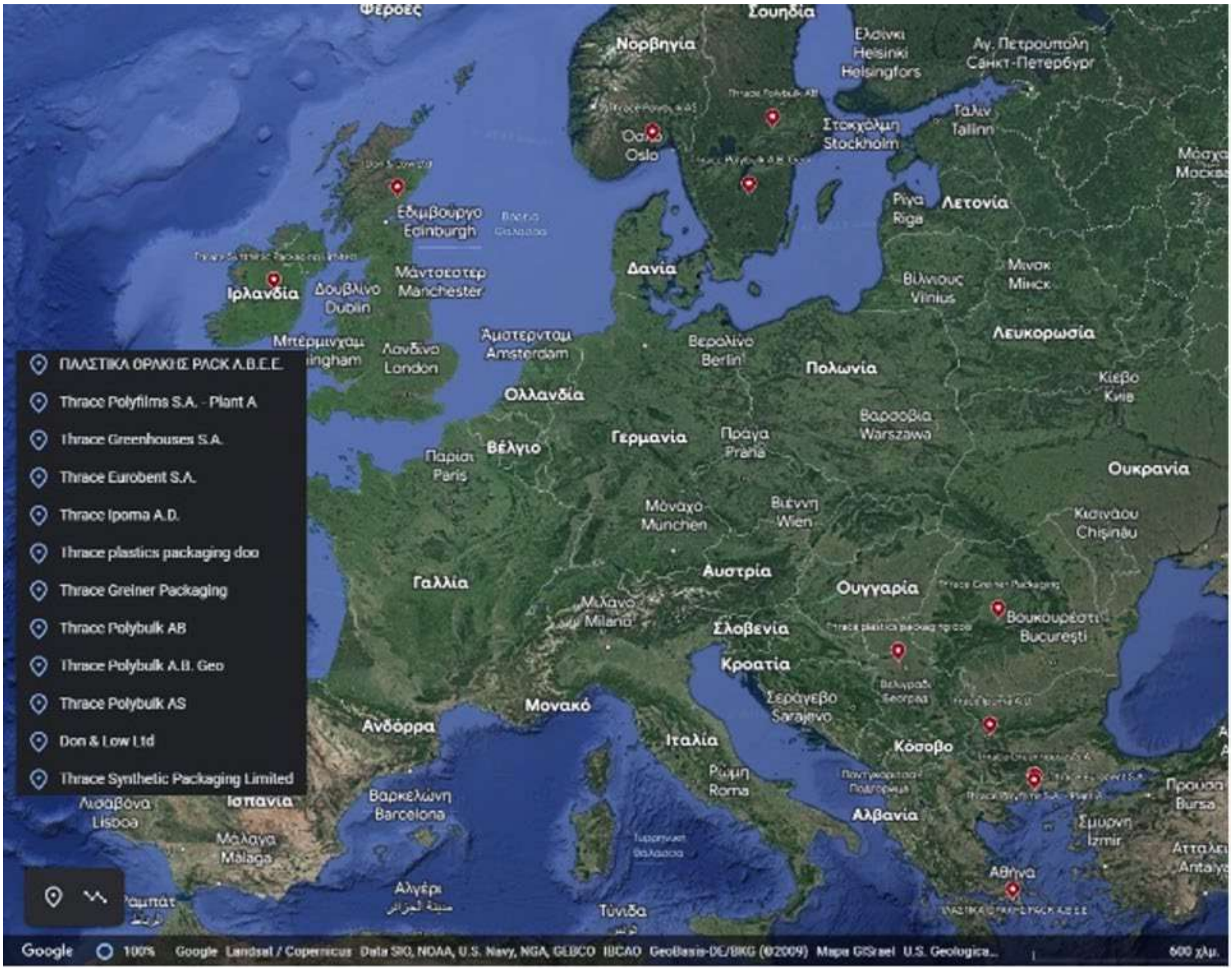
iii) Waste management that prioritizes recycling over disposal in the manufacturing process.

iv) Information on the content and traceability of it throughout the life cycle of the products.

The production of Technical Fabrics in the Group's companies aims, on the one hand, at maximum reuse and the use of secondary raw materials where possible, as well as at the maximum percentage of recycling of the generated waste.

Compliance with the criteria for the **Protection and restoration of biodiversity and ecosystems** is achieved in the Group's facilities, by having all the required environmental permits for their operation in place. The locations of the European facilities of the Group are not in or near biodiversity-sensitive areas (including the Natura 2000 network as well as other protected areas), as presented in Figure 2.

DNSH criteria for the **Pollution prevention** include the avoidance of manufacture and placing on the market of several hazardous substances. The Group does not use chemicals or other hazardous substances that are subject to national or international constraints.



The Group's facilities in Europe

1.1 *Manufacture of plastic packaging goods*

The manufacture of Plastic Packaging Goods (NACE 22.22) is an eligible activity for which, although there was no obligation during the reference period, its alignment was also assessed, without the quantitative reporting of the relevant indicators.

The economic activity of the Group in the field of plastic packaging production substantially contributes to the environmental objective of transitioning to a circular economy. These products include quantities of recycled plastic during production, they are designed to be practically recyclable on a large scale and do not incorporate substances with hazardous properties during their manufacturing.

Compliance with "***do not significant harm, DNSH***" criteria for economic activity 1.1 is being evaluated in the following paragraphs.

The "do not significant harm, DNSH" technical Criteria for **Climate Change Mitigation** include the assessment of greenhouse gas emissions during the life cycle of manufactured plastics, for plastics made from sustainable raw materials. These emissions are lower than the greenhouse gas emissions from equivalent plastics produced from fossil fuel raw materials, as evidenced through available Environmental Product Declarations (EPD).

The criteria for the environmental objective of **Climate Change Adaptation** include the assessment of the economic activity's exposure to natural climate risks, the evaluation of the impacts, and the adoption of necessary mitigation measures. The risks of flooding, heatwaves, intense snowfall/frost, stormy winds, thunderstorms, and fires have been assessed within the framework of the Emergency Response Plans of the plastic packaging production units, and the necessary mitigation measures have been adopted.

The criteria for the environmental objective of **Sustainable Use and Protection of Water and Marine Resources** are linked to risks of environmental degradation concerning water quality maintenance and the avoidance of water resource depletion. Their identification and management are achieved by attaining good water status and good ecological potential, in accordance with Directive 2000/60/EC. Within the framework of the current licensing of production facilities, potential risks in this category have been identified and monitored.

DNSH criteria for **Pollution Prevention and Control** include avoiding the production and market release or use of a range of hazardous substances. The Group does not use chemicals or other hazardous substances that fall under national or international restrictions. Additionally, for products produced from plastic materials in their primary form, emissions from the manufacturing of these plastic materials remain within or below the emission levels associated with the ranges of Best Available Techniques (BAT-AEL) determined in relevant Best Available Techniques (BAT) conclusions, on a case-by-case basis (common wastewater and exhaust gas treatment systems, regarding emissions to water, in relation to emissions to the atmosphere from new installations, etc.).

Compliance with the criteria of **Protection and Restoration of Biodiversity and Ecosystems**, is established since the Group's facilities have in force all the environmental permits for their operation, where applicable. Both economic activity 3.6 and economic activity 1.1 are taxonomy eligible and aligned, as they match the following criteria:

- **Substantial contribution** to the Adaptation to Climate Change (activity 3.6) and the Transition to a Circular Economy (activity 1.1), based on the Technical Screening Criteria.
- They **do not cause significant harm (DNSH)** to the other five environmental objectives.
- They fulfill the **Minimum Safeguards (MS)**, as referred to in the Taxonomy Regulation.

Definitions of Turnover KPI, CapEx KPI and OpEx KPI

Turnover as referred to in the EU Taxonomy Regulation is defined as net revenues pursuant to IFRS as stated in the consolidated income statement and only referring to fully consolidated subsidiaries.

Taking into account that the Group does not perform any of the activities related to natural gas and nuclear energy (activities 4.26-4.31), the specific standards introduced by the Supplementary Delegated Act regarding activities in certain energy sectors are not used. Based on point 1.2.3 of Annex 1 of the Delegated Regulation

(EU) 2021/2178, Key Performance Indicator of the joint ventures will not be presented in the context of this report.

The proportion of Taxonomy-aligned economic activities in our total turnover has been calculated as the part of net turnover derived from products and services associated with Taxonomy-aligned economic activities (numerator) divided by the net turnover (denominator) for the financial year from 1 January to 31 December 2023. The denominator of the turnover KPI is based on the consolidated net turnover in accordance with paragraph 82(a) of IAS 1.

For further details on the accounting policies regarding the consolidated net turnover, please refer to the relevant section of the Annual Financial Report 2023.

The numerator of the turnover KPI is defined as the net turnover derived from products and services associated with Taxonomy-aligned economic activities, that is:

- Activity 3.6 “Manufacture of other low carbon technologies” generates net turnover from the sale of technical fibers.

CapEx as referred to in the EU Taxonomy Regulation is calculated on a gross basis, i.e. without accounting for remeasurements, depreciation and amortization, or impairment losses. CapEx comprises investments in non-current intangible assets and in property, plant and equipment as presented in the consolidated statement of financial position. The CapEx KPI is defined as Taxonomy-aligned CapEx (numerator) divided by the total CapEx (denominator).

Total CapEx consists of additions to tangible and intangible fixed assets during the financial year, before depreciation, amortization, and any remeasurements, including those resulting from revaluations and impairments, as well as excluding changes in fair value. It includes acquisitions of tangible fixed assets (IAS 16), intangible fixed assets (IAS 38), right-of-use assets (IFRS 16) and investment properties (IAS 40). Additions resulting from business combinations are also included. Goodwill is not included in CapEx, because it is not defined as an intangible asset in accordance with IAS 38.

For further details on the accounting policies regarding CapEx, please refer to the relevant section of the Annual Financial Report 2023.

The numerator consists of the following categories of Taxonomy-eligible CapEx:

a) CapEx related to assets or processes that are associated with Taxonomy-aligned economic activities (“category a”):

- CapEx invested into the following areas is considered in the numerator of the CapEx KPI: Buildings, Equipment, Machinery, intangible assets.

b) CapEx that is part of a plan to upgrade a Taxonomy-eligible economic activity to become Taxonomy-aligned or to expand a Taxonomy-aligned economic activity (“category b”):

- Thrace Group does not have CapEx for FY 2023, under this category.

c) CapEx related to the purchase of output from Taxonomy-aligned economic activities and individual measures enabling certain target activities to become low-carbon or to lead to GHG reductions (“category c”):

- The Group does not have CapEx for FY 2023, under this category.

The Group’s CapEx can be reconciled to our consolidated financial statements. They are the total of the movement types (acquisition and production costs):

- additions
- additions from business combinations

for intangible assets, right-of-use assets, property, plant and equipment, and investment properties.

For both CapEx and OpEx KPI calculations associated with Taxonomy-aligned economic activities, double counting was avoided. To achieve this, only CapEx (and the corresponding OpEx) related to market outflows and individual measures associated with assets or processes concerning the Taxonomy-aligned economic activities were measured once. These include the production buildings and offices of the Group, the mechanical equipment, and the vehicles. Whenever an individual investment is considered aligned with the Taxonomy, the relevant percentage of CapEx is not recorded also in a (partially) Taxonomy-aligned economic activity, to avoid double counting.

OpEx as referred to in the EU Taxonomy Regulation includes expenses not eligible for capitalization that are presented in the consolidated income statement, such as expenses for research and development, building refurbishment measures, short term leases, maintenance and repairs, and all other direct expenses resulting from the maintenance of property, plant and equipment in order to safeguard the operating capability of taxonomy-eligible assets. OpEx KPI is defined as Taxonomy-aligned OpEx (numerator) divided by the total OpEx (denominator). Total OpEx consists of direct non-capitalized costs that relate to research and development, building renovation measures, short-term leases as well as all forms of maintenance and repair. This includes:

- Research and development expenditure recognized as an expense during the reporting period in our income statement.
- Maintenance and repair expenses that were carried out at the facilities of the Group
- The volume of non-capitalized leases was determined in accordance with IFRS 16 and includes expenses for short-term leases and low-value leases, as presented in the Annual Financial Report.

Key Performance Indicators[3]	**Turnover**		**CapEx**		**OpEx**	
	2022	**2023**	**2022**	**2023**	**2022**	**2023**
Total (in mil. €)	394.38	345.37	37.97	31.36	9.44	15.77
taxonomy **- aligned** (in mil. €)	154.20	135.61	21.72	10.03	3.89	7.02
%	**39.1**	**39.3**	**57.2**	**32.0**	**41.1**	**44.5**
taxonomy **- eligible** (in mil. €)	154.20	135.61	21.72	10.03	3.89	7.02
%	**39.1**	**39.3**	**57.2**	**32.0**	**41.1**	**44.5**
not taxonomy **- eligible** (in mil. €)	240.18	209.76	16.25	21.33	5.56	8.75
%	**60.9**	**60.7**	**42.8**	**68.0**	**58.9**	**55.5**

3 *Values for the Taxonomy aligned activities: **CCA 3.6** Manufacture of other low carbon Technologies and **CE 1.1** Manufacture of packaging plastic goods*

Amounts in thousand Euro, unless stated otherwise

Contextual Information

Turnover KPI - Quantitative breakdown of the numerator

A quantitative breakdown of the numerator for the turnover KPI is presented in the following table.

Quantitative breakdown of turnover numerator

	Turnover (in mil. €)
Customer contracts	135.61
Other revenue	0
Total	135.61

CapEx KPI – Quantitative breakdown at the economic activity aggregated level

For FY 2023, Taxonomy-aligned CapEx is associated with activities CCA 3.6 and CE 1.1. The following table presents breakdown of the amounts included in the numerator.

Quantitative breakdown of the CapEx numerator

Activity	CapEx (in mil. €)
Tangible additions	9.66
Intangibles additions	0.04
Right of use additions	0.33
Sum	**10.03**

Upgrade and expansion plan

The Group's facilities are constantly upgraded so that they remain safe and functional, while also meeting the Group's needs due to the ongoing investments in mechanical equipment and photovoltaic panels.

OpEx KPI – Quantitative breakdown of the numerator

The following table shows the breakdown of the OpEx numerator into its components based on the definition of OpEx in the Disclosures Delegated Act. It is noted that in relation to 2022, the cost of maintenance and repair wages is also included:

Quantitative breakdown of OpEx numerator

	OpEx (in mil. €)
R&D costs	1.07
Maintenance and repair	2.99
Maintenance and repair wages	2.78
Short term lease	0.18
Total	**7.02**

Amounts in thousand Euro, unless stated otherwise

12.8.2 Minimum Safeguards

The Group focuses strongly on labor topics, such as workers' rights, health and safety in the workplace, training, and education of employees. It also acknowledges the influence and opportunities created by the Group activities in local communities. The taxonomy-alignment evaluates the compliance with the Minimum Safeguards (MS).

The economic activities of Group are carried out in alignment with:

- the OECD Guidelines for Multinational Enterprises (OECD MNE Guidelines)
- the UN Guiding Principles on Business and Human Rights (UNGPs), including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work
- the International Bill of Human Rights.

The scope of the MS covers the following four topics:

- human rights (including labor and consumer rights)
- corruption and bribery
- taxation
- fair competition

The Group's approach, to assess compliance with MS, consists of two (2) stages. The implementation of adequate processes for the prevention of negative impacts is the 1st stage and the monitoring of the outcomes is the 2nd one.

Human Rights (Including labor and consumer rights)

The Group is committed to full compliance with the current regulatory framework, the Internal Operating Regulation, and the Group Policies. Furthermore, it is committed to zero tolerance on issues concerning human rights. The Group, through its Code of Ethical Conduct and Deontology, has established principles for respecting human rights, where it commits to zero tolerance for harassment in the workplace, any form of discrimination, and phenomena of forced and child labor across the entire value chain. It also commits to resolving complaints and treating employees in a fair and impartial manner and has established guidelines and internal regulations that refer to human rights and informs employees through the Internal Labor Regulation.

Taxation

The Group aims in producing and distributing, through its business activities and high-performance levels both directly and indirectly, economic value to the communities in which it operates, placing special emphasis on:

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

Corruption and bribery

The Group is committed to zero tolerance on issues of corruption and bribery. To achieve this, a comprehensive framework of principles and policies have been adopted, that ensure transparency and responsible operation, conducts relevant updates and checks on an annual basis through the Internal Audit Department, has determined disciplinary measures, and has constituted the Audit Committee.

The Group has adopted and follows a comprehensive framework of principles and policies that ensure its transparency and responsible operation. To ensure the avoidance of incidents of corruption and bribery, it operates preventively, conducting relevant updates and checks on an annual basis through the Internal Audit Department. Disciplinary measures have been determined to discourage participation in a similar incident.

Fair Competition

The Group is firmly committed to conducting its business activity with integrity, always taking into account the highest standards of ethics and the laws in effect. The Code of Ethics and Conduct specifies the standards of behavior required by the employees of the companies of the Group in every country where the Group is operating. The basic principles of the Code are listed:

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

Annexes

Proportion of **Turnover** from products or services associated with Taxonomy-aligned economic activities - disclosure covering year 2023

Financial Year 2023	Year			Substantial contribution criteria						DNSH criteria ("Does Not Significantly Harm")									
Economic Activities (1)	Code (2)	Turnover, mil. € (3)	Proportion of Turnover, year 2023 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy- aligned (A.1.) or -eligible (A.2.) turnover, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of other low carbon technologies	CCA 3.6	135.61	39.3	N	Y	N	N	N	N	Y	N/A	Y	Y	Y	Y	Y	39.1	E	
Manufacture of plastic packaging goods	CE 1.1	–	–	N	N	N	N	Y	N	Y	Y	Y	Y	N/A	Y	Y	N/A	E	
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		135.61	39.3		39.3					Y	N/A	Y	Y	Y	Y	Y	39.1		
Of which enabling		135.61	39.3		39.3					Y	N/A	Y	Y	Y	Y	Y	39.1	E	
Of which transitional																			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Activity																			
Turnover of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. Turnover of Taxonomy-eligible activities (A.1 + A.2)		135.61	39.3																
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy- non-eligible activities		209.76	60.7																
TOTAL		**345.37**	**100**																

Amounts in thousand Euro, unless stated otherwise

Proportion of **CapEx** from products or services associated with Taxonomy-aligned economic activities - disclosure covering year 2023

Financial Year 2023	**Year**			**Substantial contribution criteria**						**DNSH criteria ("Does Not Significantly Harm")**									
Economic Activities (1)	Code (2)	CapEx, mil. € (3)	Proportion of Turnover, year 2023 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy- aligned (A.1.) or -eligible (A.2.) turnover, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of other low carbon technologies	CCA 3.6	10.03	32.0	N	Y	N	N	N	N	Y	N/A	Y	Y	Y	Y	Y	57.2	E	
Manufacture of plastic packaging goods	CE 1.1	–	–	N	N	N	N	Y	N	Y	Y	Y	Y	N/A	Y	Y	A/A	E	
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		10.03	32.0		32.0					Y	N/A	Y	Y	Y	Y	Y	57.2		
Of which enabling		10.03	32.0		32.0					Y	N/A	Y	Y	Y	Y	Y	57.2	E	
Of which transitional																			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Activity																			
CapEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. CapEx of Taxonomy-eligible activities (A.1 + A.2)		10.03	32.0																
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy- non-eligible activities		21.33	68.0																
TOTAL		**31.36**	**100**																

Amounts in thousand Euro, unless stated otherwise

Proportion of **OpEx** from products or services associated with Taxonomy-aligned economic activities - disclosure covering year 2023

Financial Year 2023	**Year**			**Substantial contribution criteria**						**DNSH criteria ("Does Not Significantly Harm")**									
Economic Activities (1)	Code (2)	OpEx, mil € (3)	Proportion of Turnover, year 2023 (4)	Climate Change Mitigation (5)	Climate Change Adaptation (6)	Water (7)	Pollution (8)	Circular Economy (9)	Biodiversity (10)	Climate Change Mitigation (11)	Climate Change Adaptation (12)	Water (13)	Pollution (14)	Circular Economy (15)	Biodiversity (16)	Minimum Safeguards (17)	Proportion of Taxonomy- aligned (A.1.) or -eligible (A.2.) turnover, year 2022 (18)	Category enabling activity (19)	Category transitional activity (20)
Text		Currency	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmentally sustainable activities (Taxonomy-aligned)																			
Manufacture of other low carbon technologies	CCA 3.6	7.02	44.5	N	Y	N	N	N	N	Y	N/A	Y	Y	Y	Y	Y	41.1	E	
Manufacture of plastic packaging goods	CE 1.1	–	–	N	N	N	N	Y	N	Y	Y	Y	Y	N/A	Y	Y	N/A	E	
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		7.02	44.5		44.5					Y	Y	Y	Y	Y	Y	Y	41.1		
Of which enabling		7.02	44.5		44.5						N/A	Y	Y	Y	Y	Y	41.1	E	
Of which transitional																			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
Activity																			
OpEx of Taxonomy- eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. OpEx of Taxonomy-eligible activities (A.1 + A.2)		7.02	44.5																
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy- non-eligible activities		8.75	55.5																
TOTAL		**15.77**	**100**																

Amounts in thousand Euro, unless stated otherwise

Index of Abbreviations

ATHEX ESG	Athens Stock Exchange Environmental, Social, and Governance Guide
BRC (Brand Reputation Compliance)	Global Standard for Food Safety
CDP	International non-profit organization assisting companies in disclosing their environmental impacts
EcoVadis	Company assessment organization for non-financial information and responsible business conduct
EPD (Environmental Product Declaration)	Declaration disclosing environmental information about a product
ESG	Environmental, social, and corporate governance
EuCertPlus	Certification focusing on traceability of plastic materials and recycled content quality in final products
FDA (Food and Drug Administration)	International organization responsible for protecting and promoting public health
GRI (Global Reporting Initiative)	International standard for sustainability reporting. Core option is followed in this report.
IFS (International Food Standard)	International standard for food safety and quality certification
In the Loop	Platform for upgrading plastic waste recycling
ISO (International Standardization Organization)	International standards organization
LCA (Life Cycle Assessment)	Method of analyzing the life cycle of a product
Nasdaq ESG	Global reference guide for environmental, social, and governance (ESG) for public and private companies
RecyClass	Certification for traceability of recycled content in plastic products
SASB (Sustainability Accounting Standards Board)	International standards for sustainability information disclosure
SBTi (Science Based Targets initiative)	International initiative providing clearly defined methodology for emission reduction in line with the Paris Agreement goals
SDGs (Sustainable Development Goals)	United Nations Sustainable Development Goals
TCFD (Task Force on Climate-Related Financial Disclosures)	International initiative developing recommendations for more effective disclosures related to climate change
tCO_2e	Greenhouse gas emissions in tons of carbon dioxide equivalent
TUV OK Recycled	Certification scheme defining requirements for calculating recycled content of plastic products

Xanthi, 22 April 2024

The Chairman of the Board of Directors	The Chief Executive Officer & Executive Member of the Board of Directors	The Non-Executive Member of the Board of Directors
Konstantinos St. Chalioris	**Dimitris P. Malamos**	**Vasileios S. Zairopoulos**

Audit Report by Certified Auditor

Independent auditor's report

To the Shareholders of "Thrace Plastics Co S.A."

Report on the audit of the separate and consolidated financial statements

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We have audited the accompanying separate and consolidated financial statements of "Thrace Plastics Co S.A." (Company and Group) which comprise the separate and consolidated statement of financial position (or balance sheet) as of December 31, 2023, the separate and consolidated statements of profit or loss and other comprehensive income (or profit or loss, comprehensive income), changes in equity and cash flow statements for the year then ended, and notes to the separate and consolidated financial statements, comprising material accounting policy information.

In our opinion, the consolidated financial statements present fairly, in all material respects the separate and consolidated financial position of the Company and the Group as at December 31, 2023, their separate and consolidated financial performance and their separate and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards, as adopted by the European Union and comply with the statutory requirements of Law 4548/2018

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs), as they have been transposed into Greek Law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the separate and consolidated financial statements section of our report.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

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During our audit we remained independent of the Company and the Group in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code) that has been transposed into Greek Law, and the ethical requirements of Law 4449/2017 and of Regulation (EU) No 537/2014, that are relevant to the audit of the separate and consolidated financial statements in Greece. We have fulfilled our other ethical responsibilities in accordance with Law 4449/2017, Regulation (EU) No 537/2014 and the requirements of the IESBA Code.

We declare that the non-audit services that we have provided to the Company and its subsidiaries are in accordance with the aforementioned provisions of the applicable law and regulation and that we have not provided non-audit services that are prohibited under Article 5(1) of Regulation (EU) No 537/2014.

The non-audit services that we have provided to the Company and its subsidiaries, during the year ended as at December 31, 2023, are disclosed in the note 3.30 to the separate and consolidated financial statements.

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Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the separate and consolidated financial statements of the year under audit. These matters

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STATEMENT OF INCOME AND OTHER COMPREHENSIVE INCOME

		Group		Company	
	Note	**1/1 - 31/12/2023**	1/1 - 31/12/2022	**1/1 - 31/12/2023**	1/1 - 31/12/2022
Turnover		**345,373**	394,382	**5,600**	5,658
Cost of Sales		**(268,304)**	(310,119)	**(5,173)**	(5,376)
Gross profit/(loss) - continuing operations		**77,069**	84,263	**427**	282
Other Operating Income	3.3	**4,065**	2,766	**339**	238
Selling and Distribution Expenses	3.5	**(38,835)**	(39,693)	**-**	-
Administrative Expenses	3.5	**(17,263)**	(16,966)	**(1,223)**	(1,160)
Research and Development Expenses	3.5	**(2,506)**	(2,295)	**-**	-
Other Operating Expenses	3.7	**(1,860)**	(1,577)	**(19)**	(6)
Other gain / (losses)	3.4	**(7)**	909	**(39)**	(2)
Operating Profit /(loss) before interest and tax - continuing operations		**20,663**	27,407	**(515)**	(648)
Financial Income	3.8	**3,052**	6,553	**894**	-
Financial Expenses	3.8	**(4,710)**	(4,417)	**(44)**	(55)
Income from Dividends		**-**	-	**12,029**	13,478
Profit / (loss) from companies consolidated with the Equity Method	3.28	**2,331**	2,525	**-**	-
Profit/(loss) before Tax - continuing operations		**21,336**	32,068	**12,364**	12,775
Income Tax	3.10	**(3,010)**	(5,798)	**(1,294)**	(1,604)
Profit/(loss) after tax (A) - continuing operations		**18,326**	26,270	**11,070**	11,171
Profit/(loss) after tax (A) - discontinued operations		**-**	(35)	-	-
Profit/(loss) after tax (A)		**18,326**	26,235	11,070	11,171
Other Comprehensive Income (Loss)					
Items that may be classified in the future in the statement of income					
FX differences from SOFP balances translation		**1,041**	(4,791)	**-**	-
Items that will not be classified in the future in the statement of income					
Actuarial profit/(loss)		**1,345**	6,745	**(3)**	11
Other comprehensive income after taxes (B) - continuing operations		**2,386**	1,954	**(3)**	11
Items that may be classified in the future in the statement of income					
FX differences from SOFP balances translation		**(14)**	311	-	-
Items that will not be classified in the future in the statement of income					
Actuarial profit/(loss)		**-**	-	-	-
Other comprehensive income after taxes (B) - discontinued operations		**(14)**	311	**-**	-
Items that may be classified in the future in the statement of income					
FX differences from SOFP balances translation		**1,027**	(4,480)	-	-
Items that will not be classified in the future in the statement of income					
Actuarial profit/(loss)		**1,345**	6,745	(3)	11
Other comprehensive income after taxes (B)		**2,372**	2,265	**(3)**	11
Total comprehensive income / (loss) after taxes (A) + (B) - continuing operations		**20,712**	28,224	**11,067**	11,182
Total comprehensive income / (loss) after taxes (A) + (B) - discontinued operations		**(14)**	276	**-**	-
Total comprehensive income / (loss) after taxes (A) + (B)		**20,698**	28,500	**11,067**	11,182

The accompanying notes that are presented in pages 198-292 form an integral part of the present Financial Statements

Amounts in thousand Euro, unless stated otherwise

STATEMENT OF INCOME AND OTHER COMPREHENSIVE INCOME (continues from previous page)

		Group		Company	
Continuing operations		**1/1 - 31/12/2023**	1/1 - 31/12/2022	**1/1 - 31/12/2023**	1/1 - 31/12/2022
Profit / (loss) after tax					
Attributed to:					
Equity holders of the parent		**17,767**	**25,777**	-	-
Non controlling interest		**559**	**493**	-	-
Total comprehensive income / (loss) after taxes					
Attributed to:					
Equity holders of the parent		**20,161**	**27,720**	-	-
Non controlling interest		**551**	**504**	-	-
Discontinued operations					
Profit / (loss) after tax					
Attributed to:					
Equity holders of the parent		-	**(35)**	-	-
Non controlling interest		-	-	-	-
Total comprehensive income / (loss) after taxes					
Attributed to:					
Equity holders of the parent		**(14)**	**276**	-	-
Non controlling interest		-	-	-	-
Total Operations					
Profit / (loss) after tax					
Attributed to:					
Equity holders of the parent		**17,767**	**25,742**	-	-
Non controlling interest		**559**	**493**	-	-
Total comprehensive income / (loss) after taxes					
Attributed to:					
Equity holders of the parent		**20,147**	**27,996**	-	-
Non controlling interest		**551**	**504**	-	-
Profit/(loss) allocated to shareholders per share - continuing operations					
Number of shares		**42,974**	**43,067**		
Earnings/(loss) per share	3.9	**0.4134**	**0.5985**		
Profit/(loss) allocated to shareholders per share - discontinued operations					
Number of shares		**42,974**	**43,067**		
Earnings/(loss) per share	3.9	**0.0000**	**(0.0008)**		
Profit/(loss) allocated to shareholders per share					
Number of shares		**42,974**	**43,067**		
Earnings/(loss) per share	3.9	**0.4134**	**0.5977**		

The accompanying notes that are presented in pages 198-292 form an integral part of the present Financial Statements

Amounts in thousand Euro, unless stated otherwise

STATEMENT OF FINANCIAL POSITION

		Group		Company	
	Note	**31/12/2023**	31/12/2022	**31/12/2023**	31/12/2022
ASSETS					
Non-Current Assets					
Property Plant and Equipment	3.11	**177,670**	169,218	**230**	302
Rights-of-use assets	3.12	**3,154**	2,521	**332**	222
Investment property		**113**	113	**-**	-
Intangible Assets	3.13	**10,316**	10,357	**87**	148
Investments in subsidiaries	3.28	**-**	-	**73,858**	73,858
Investments in joint ventures	3.28	**20,475**	19,921	**3,819**	3,819
Net benefit from funded defined benefit plans	3.21	**9,533**	7,169	**-**	-
Other long term receivables	3.14	**138**	132	**42**	39
Deferred tax assets	3.2	**326**	357	**126**	119
Total non-Current Assets		**221,725**	209,788	**78,494**	78,507
Current Assets					
Inventories	3.2	**72,003**	76,415	**-**	-
Income tax prepaid		**956**	1,984	**866**	25
Trade receivables	3.2	**62,179**	64,769	**511**	55
Other debtors	3.2	**21,523**	11,945	**3,190**	4,105
Financial derivative products	3.2	**77**	284	**-**	-
Cash and Cash Equivalents	3.2	**27,801**	39,610	**242**	1,427
Total Current Assets		**184,539**	195,007	**4,809**	5,612
TOTAL ASSETS		**406,264**	404,795	**83,303**	84,119
EQUITY AND LIABILITIES					
Equity					
Share Capital	3.2	**28,869**	28,869	**28,869**	28,869
Share premium	3.19	**21,524**	21,524	**21,644**	21,644
Other reserves	3.19	**23,053**	20,992	**12,613**	12,291
Retained earnings		**199,204**	192,355	**17,232**	18,024
Total Shareholders' equity		**272,650**	263,740	**80,358**	80,828
Non controlling interest		**4,404**	4,121	**-**	-
Total Equity		**277,054**	267,861	**80,358**	80,828
Long Term Liabilities					
Long Term Debt	3.20	**27,790**	31,641	**-**	-
Liabilities from leases	3.1	**1,885**	1,470	**179**	76
Provisions for Employee Benefits	3.21	**1,658**	1,385	**99**	79
Other provisions		**-**	-	**279**	283
Deferred Tax Liabilities	3.2	**7,910**	9,660	**-**	-
Other Long Term Liabilities		**518**	174	**1**	1
Total Long Term Liabilities		**39,761**	44,330	**558**	439
Short Term Liabilities					
Short Term Debt	3.20	**26,555**	26,989	**-**	1,022
Liabilities from leases	3.1	**1,140**	967	**143**	147
Income Tax		**1,914**	1,048	**615**	56
Suppliers	3.23	**38,462**	40,630	**364**	295
Other short-term liabilities	3.23	**21,378**	22,970	**1,265**	1,332
Total Short Term Liabilities		**89,449**	92,604	**2,387**	2,852
TOTAL LIABILITIES		**129,210**	136,934	**2,945**	3,291
TOTAL EQUITY & LIABILITIES		**406,264**	404,795	**83,303**	84,119

The accompanying notes that are presented in pages 198-292 form an integral part of the present Financial Statements

Amounts in thousand Euro, unless stated otherwise

STATEMENT OF CHANGES IN EQUITY

Group

2. Basis for the Preparation of the Financial Statements and Main Accounting Principles

2.1 Basis of Preparation

The present financial statements have been prepared according to the International Financial Reporting Standards (I.F.R.S.), including the International Accounting Standards (I.A.S.) and interpretations that have been issued by the International Financial Reporting Interpretations Committee (I.F.R.I.C.), as such have been adopted by the European Union until 31 December 2023. The basic accounting principles that were applied for the preparation of the financial statements for the year ended on 31 December 2023 are the same as those applied for the preparation of the financial statements for the year ended on 31 December 2022 and are described in such.

When deemed necessary, the comparative data have been reclassified in order to conform to possible changes in the presentation of the data of the present year.

Differences that possibly appear between accounts in the financial statements and the respective accounts in the notes, are due to rounding.

The financial statements have been prepared according to the historic cost principle, as such is disclosed in the Company's accounting principles presented below.

Moreover, the Group's and Company's financial statements have been prepared under the "going concern" principle taking into account the significant profitability of the Group and the Company and all macroeconomic and microeconomic factors as well as their impact on the smooth operation of the Group and the Company.

The financial statements were approved by the Board of Directors of the Company on April 22, 2024 and are subject to approval by the next Ordinary General Meeting which will convene within the year 2024.

The financial statements of the Group THRACE PLASTICS Co. S.A. as well as of the parent company are posted on the internet, on the website *www.thracegroup.gr*.

2.2 New standards, amendments to standards and interpretations

Certain new standards, amendments to standards and interpretations have been issued that are mandatory for periods beginning on or after 1 January 2023.

STANDARDS AND INTERPRETATIONS EFFECTIVE FOR THE CURRENT FINANCIAL YEAR

IAS 1 (Amendments) 'Presentation of Financial Statements' and IFRS Practice Statement 2 'Disclosure of Accounting policies' *(effective for annual periods beginning on or after 1 January 2023)*

The amendments require companies to disclose their material accounting policy information and provide guidance on how to apply the concept of materiality to accounting policy disclosures.

IAS 8 (Amendments) 'Accounting policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates' *(effective for annual periods beginning on or after 1 January 2023)*

The amendments clarify how companies should distinguish changes in accounting policies from changes in accounting estimates.

IAS 12 (Amendments) 'Deferred tax related to Assets and Liabilities arising from a Single Transaction' *(effective for annual periods beginning on or after 1 January 2023)*

The amendments require companies to recognise deferred tax on transactions that, on initial recognition, give rise to equal amounts of taxable and deductible temporary differences. This will typically apply to transactions such as leases for the lessee and decommissioning obligations.

IFRS 17 (Amendment) 'Initial Application of IFRS 17 and IFRS 9 – Comparative Information' *(effective for annual periods beginning on or after 1 January 2023)*

The amendment is a transition option relating to comparative information about financial assets presented on initial application of IFRS 17. The amendment is aimed at helping entities to avoid temporary accounting mismatches between financial assets and insurance contract liabilities, and therefore improve the usefulness of comparative information for users of financial statements.

IAS 12 'Income taxes' (Amendments): International Tax Reform – Pillar Two Model Rules *(effective for annual periods beginning on or after 1 January 2023)*

The amendments introduce a mandatory temporary exception from accounting for deferred taxes arising from the Organization for Economic Co-operation and Development's (OECD) international tax reform. The amendments also introduce targeted disclosure requirements.

The temporary exception applies immediately and retrospectively in accordance with IAS 8, whereas the targeted disclosure requirements will be applicable for annual reporting periods beginning on or after 1 January 2023.

The aforementioned amended standards did not have any significant impact on the financial statements of the Group and the Company

STANDARDS AND INTERPRETATIONS EFFECTIVE FOR SUBSEQUENT PERIODS

IAS 1 'Presentation of Financial Statements' (Amendments) *(effective for annual periods beginning on or after 1 January 2024)*

- **2020 Amendment 'Classification of liabilities as current or non-current'**

  The amendment clarifies that liabilities are classified as either current or non-current depending on the rights that exist at the end of the reporting period. Classification is unaffected by the expectations of the entity or events after the reporting date. The amendment also clarifies what IAS 1 means when it refers to the 'settlement' of a liability.

- **2022 Amendments 'Non-current liabilities with covenants'**

  The new amendments clarify that if the right to defer settlement is subject to the entity complying with specified conditions (covenants), this amendment will only apply to conditions that exist when compliance is measured on or before the reporting date. Additionally, the amendments aim to improve the information an entity provides when its right to defer settlement of a liability is subject to compliance with covenants within twelve months after the reporting period.

  The 2022 amendments changed the effective date of the 2020 amendments. As a result, the 2020 and 2022 amendments are effective for annual reporting periods beginning on or after 1 January 2024 and should be applied retrospectively in accordance with IAS 8. As a result of aligning the effective dates, the 2022 amendments override the 2020 amendments when they both become effective in 2024.

IFRS 16 (Amendment) 'Lease Liability in a Sale and Leaseback' *(effective for annual periods beginning on or after 1 January 2024)*

The amendment clarifies how an entity accounts for a sale and leaseback after the date of the transaction. Sale and leaseback transactions where some or all the lease payments are variable lease payments that do not depend on an index or rate are most likely to be impacted. An entity applies the requirements retrospectively back to sale and leaseback transactions that were entered into after the date when the entity initially applied IFRS 16.

IAS 7 'Statement of Cash Flows' and IFRS 7 'Financial Instruments' (Amendments) - Disclosures: Supplier Finance Arrangements *(effective for annual periods beginning on or after 1 January 2024)*

The amendments require companies to disclose information about their Supplier Finance Arrangements such as terms and conditions, carrying amount of financial liabilities that are part of such arrangements, ranges of payment due dates and liquidity risk information. The amendments have not yet been endorsed by the EU.

IAS 21 'The Effects of Changes in Foreign Exchange Rates' (Amendments) - Lack of exchangeability *(effective for annual periods beginning on or after 1 January 2025)*

These amendments require companies to apply a consistent approach in assessing whether a currency can be exchanged into another currency and, when it cannot, in determining the exchange rate to use and the disclosures to provide. The amendments have not yet been endorsed by the EU.

IFRS 18 "Presentation and Disclosure in Financial Statements' *(effective for annual periods beginning on or after 1 January 2027)*

IFRS 18 was issued in April 2024. It sets out requirements on presentation and disclosures in financial statements and replaces IAS 1. Its objective is to make it easier for investors to compare the performance and future prospects of entities by changing the requirements for presenting information in the primary financial statements, particularly the statement of profit or loss. The new standard:

- requires presentation of two new defined subtotals in the statement of profit or loss—operating profit and profit before financing and income taxes.
- requires disclosure of management-defined performance measures—subtotals of income and expenses not specified by IFRS that are used in public communications to communicate management's view of an aspect of a company's financial performance. To promote transparency, a company will be required to provide a reconciliation between these measures and totals or subtotals specified by IFRS.
- enhances the requirements for aggregation and disaggregation to help a company to provide useful information.
- requires limited changes to the statement of cash flows to improve comparability by specifying a consistent starting point for the indirect method of reporting cash flows from operating activities and eliminating options for the classification of interest and dividend cash flows.

The new standard has retrospective application. It has not yet been endorsed by the EU.

2.3 Significant Accounting Estimations and Judgments of the Group's Management

The estimations and judgments of the Management of the Group are constantly assessed. They are based on historical data and expectations for future events, which are deemed as fair according to the relevant provisions in effect.

2.3.1 Significant Accounting Estimates and Assumptions

The preparation of the Financial Statements in accordance with International Financial Reporting Standards (IFRS) requires the management to make estimates and assumptions that may affect the accounting balances of assets and liabilities, the required disclosure of contingent assets and liabilities at the date of preparation of the Financial Statements, as well as the amounts of income and expenses recognized during the financial year. The use of the available information, which is based in historical data and assumptions and the implementation of subjective evaluation are necessary in order to conduct estimates. The actual future results may differ from the above estimates and these differences may affect the Financial Statements.

Estimates and relative assumptions are revised constantly. The revisions in accounting estimations are recognized in the period they occur if the revision affects only the specific period or in the revised period and the future periods if the revisions affect the current and the future periods.

The key estimates and judgments that refer to elements and data whose development could affect the items of the Financial Statements during the next twelve months are as follows:

2.3.1.1 Provisions for expected credit losses from customers and other receivables

The Group and the Company recognize impairment losses for expected credit losses for all financial assets. Expected credit losses are based on the difference between the contractual cash flows and all cash flows that the Group (or the Company) expects to receive. The difference is discounted using an estimate of the initial effective interest rate of the financial asset. For customer receivables, the Group and the Company applied the simplified approach to the standard and calculated the expected credit losses on the basis of the expected credit losses over the lifetime of those items. For other financial assets, the expected credit losses are calculated on the basis of the losses for the next 12 months. Expected credit losses over the next 12 months are part of the expected credit losses over the life of the financial assets resulting from the probability of default of an item within 12 months of the reporting date. If there is a significant increase in credit risk from the initial recognition, the provision for impairment will be based on the expected credit losses over the life of the asset (see note 3.16.3 and 3.31.2).

2.3.1.2 Impairment of Investment in Subsidiaries

Management examines on an annual basis whether there are indicators of impairment of investment in subsidiaries. If an investment has to be impaired, the Company calculates the amount of the impairment as the difference between the recoverable amount of the investment and its book value. Management determines recoverable value as the greater of the value in use and the fair value less costs to sell in accordance with the provisions of IAS 36. Value in use is determined by an independent valuer based on management's estimates and assumptions such as future cash flows, returns of each subsidiary company, and discounted rates applied to the projected cash flows. Moreover, these assumptions vary due to the different conditions prevailing in the markets of the countries in which the Group operates (see note 3.28).

2.3.1.3 Estimate on Impairment of Goodwill

The Group assesses whether there is impairment of goodwill at least on an annual basis. Management identifies the recoverable amount as the greater of its value in use and its fair value less costs to sell. The calculation of the acquisition (book) value of each cash-generating unit requires an estimate by management of the assumptions about the future results of the above cash-generating units, such as growth rate in perpetuity, forecasts for projected quantities and sales prices, gross profit margin and discount rates. These assumptions vary due to different market conditions in the countries in which the Group operates (see note 3.13)

2.3.1.4 Provision for income tax

The provision for income tax according to I.A.S. 12 is calculated by estimating taxes that will be paid to the tax authorities and includes the current income tax for each financial year and a provision for additional taxes that may arise in future tax audits. Group companies are subject to different income tax laws and therefore significant management assessment is required to determine the Group's income tax income. Income tax expense may differ from these estimates as a result of future changes in tax legislation both in the countries in which the Group operates and in Greece or unforeseen consequences from the final determination of the tax liability of each use by the tax authorities. These changes may have a significant impact on the Group's and Company's financial position in the event that the final settlement of income taxes deviates from the initial amounts that have been recorded in the Group and Company Financial Statements. These differences will affect income tax and deferred tax provisions for the year in which the final determination is made. For more information, see note 3.10

2.3.1.5 Provisions for employee benefits

The present value of the liabilities for post-employment benefits depends on a number of factors defined on actuarial basis via the use of a significant number of assumptions. The assumptions used for the determination of the net cost (income) for post-employment benefits include discount rates, rates of wage increases, mortality and disability rates, retirement ages and other factors. Any changes to these underlying assumptions may have a significant effect on the liability and the relative costs of each period.

The Group defines the appropriate discount rate in each reporting period. It is the interest rate applicable for the calculation of the present value of the estimated future payments required for the settlement of the benefit liabilities. For the estimation of the appropriate discount rate the Group takes into consideration the interest rates prevailing in high credit rating corporate bonds denominated in the currency of the benefit payments and with maturity dates similar to the ones of the respective liabilities. Due to the long-term nature of these defined benefit plans, these cases are subject to a significant degree of uncertainty. Further information is provided in note 3.21

2.3.1.6 Depreciation/amortization of tangible and intangible assets

The Group and the Company calculate depreciation/amortization on tangible and intangible assets based on estimation of the useful life of such. The residual value and useful life of such assets are reviewed and defined at the end of each reporting period, if deemed necessary.

2.3.2 Significant Accounting Judgments in the Application of Accounting Principles

There are no significant estimates to be applied in accounting policies.

2.4 Basis of Consolidation

2.4.1 Subsidiaries

Subsidiaries are all companies (including those companies of special purpose) which are controlled by the Group. The Group controls a company when the Group is exposed to or has rights in variable returns from its participation in the company and has the ability to affect these returns through the power it possesses in the company. The subsidiaries are consolidated with the full consolidation method from the date at which the control is acquired by the Group and are excluded from consolidation from the date at which such control does not exist.

The mergers of companies are accounted for, from the Group based on the purchase method. The price of the acquisition is calculated as the fair value of the transferred assets, the liabilities undertaken against the former shareholders and the shares issued by the Group. The price of the acquisition includes the fair value of any asset or liability which may derive from any potential agreement about the price. The assets acquired and the liabilities along with the contingent liabilities assumed during a corporate merger are measured initially at fair value at the date of the acquisition. Depending on the acquisition case, the Group recognizes any non-controlled interest in the subsidiary either at fair value or at the value of the stake of the non-controlled interest in the equity of the subsidiary. The acquisition cost less the fair value of the individual items acquired is recorded as goodwill. If the total cost of the acquisition is less than the fair value of the individual items acquired, the difference is immediately recognized in the results.

The expenses related to the acquisition are recorded in the financial results.

If the corporate merger is gradually achieved then the fair value of the participation held by the Group in the acquired company is revalued at fair value at the acquisition date. The profit or loss which emerges from the revaluation is recognized in the financial results.

Any potential price that is transferred from the Group is recognized at fair value at the acquisition date. Any subsequent changes in the fair value of the potential price, which is considered as an asset or a liability, are recognized according to IAS 39 in the financial results. If the potential price is recorded as item of the equity, then it is not revalued until its final settlement through the equity.

Intra-company transactions, balances and non-realized earnings from transactions among the companies of the Group are excluded. The non-realized losses are also excluded. The accounting principles that are applied by the subsidiaries have been adjusted wherever it was deemed necessary so that they are aligned with the ones adopted by the Group.

The Company records the investments in subsidiaries in the separate financial statements at acquisition cost minus any impairment. Furthermore, the acquisition cost is adjusted so that it reflects the changes in the payable price deriving from any amendments in the potential price.

2.4.2 Transactions with owners of non-controlled interests

The Group treats the transactions with the owners of non-controlled interests, which do not result into loss of control, in the same manner with the transactions with the major shareholders of the Group. The difference between the price paid and the book value of the acquired interest of the subsidiary's equity is recorded in the shareholders' funds. Earnings of losses deriving from the sale to owners of non-controlled interests are also recorded in shareholders' funds.

2.4.3 Sale of Subsidiary

When the Group ceases to possess control, the remaining percentage is measured at fair value, whereas any potential differences that derive in comparison with the current value are recorded in the financial results. Following, this asset is recognized as associate company, joint venture or financial asset at the above fair value. Additionally, any relevant amounts which were previously recorded in the other comprehensive income are accounted for, with the same manner that would be followed in the case of sale of these assets and liabilities, meaning that they can be transferred in the financial results.

2.4.4 Joint Arrangements

Based on IFRS 11, investments in joint arrangements are classified either as joint activities or as joint ventures and the classification depends on the contractual rights and the liabilities of each investor. The Group evaluated the nature of its investments in joint arrangements and decided that these constitute joint ventures. Joint ventures are consolidated according to the equity method.

According to the equity method, investments in joint ventures are initially recognized at the acquisition cost, which in a later stage increases or decreases via the recognition of the Group's share in the earnings or losses of the joint ventures and the changes in the other comprehensive income after the acquisition. In case the share of the Group in the losses of the joint ventures exceeds the amount of the investment (which also includes any long-term investment that essentially constitutes part of the net investment of the Group in the joint ventures), no additional losses should be recognized, unless there have been payments or there are commitments undertaken for the account of the joint ventures.

Non-realized profit from transactions between the Group and the joint ventures is excluded according to the percentage of the Group's participation in the joint ventures. The non-realized losses are also excluded, unless the transaction offers indications of a potential impairment of the transferred asset. The accounting principles of the joint ventures have been amended wherever it was deemed appropriate so that they are aligned with the ones adopted by the Group.

2.5 Tangible Assets

Tangible assets are recorded at book value, net of any grants received, less accumulated depreciation and any impairment in value. Expenses for replacement of part of tangible assets are included in the value of the asset if they can be estimated accurately and increase the future benefits of the Group from such. The repairs and maintenance of tangible assets charge the financial results, in the period when such are realized. The acquisition cost and the related accumulated depreciation of assets retired or sold, are removed from the accounts at the time of sale or retirement, and any gain or loss is included in the financial results.

Depreciation is charged in the financial results based on the straight-line method over the estimated useful life of tangible assets, however, in extraordinary cases of investments in machinery where the financial benefits are not estimated to be evenly distributed throughout the useful life of the asset, the diminishing balance method is used. The estimated useful life of each category of asset is presented below:

Category	Depreciation rate	Useful Life
Buildings and technical works	2.5% - 5%	20 - 40 years
Machinery and technical installations	7% - 10%	10 - 14 years
Specialized mechanical equipment	12% - 15%	7 - 8 years
Vehicles	10% - 20%	5 - 10 years
Furniture and fixture	10% - 30%	3 - 10 years

Land and plots are not depreciated, however they are reviewed for impairment. Residual values and useful life of tangible assets might be adjusted if necessary at the time the Financial Statements are prepared. Tangible assets, that have been impaired, are adjusted to reflect their recoverable value (Note 3.11). The remaining value, if not negligible, is re-estimated on an annual basis.

Tangible assets are derecognized when sold, or when no future economic benefits are expected from their use. The gains and losses arising from the sale of property, plant and equipment are determined by the difference between the sale proceeds and the net book value as shown in the books and included in the operating result.

Amounts in thousand Euro, unless stated otherwise

The analysis of expenses per operating category, is as follows:

Analysis of expenses	Group		Company	
	2023	2022	2023	2022
Production	**97,414**	98,227	**5,173**	5,376*
Administrative	**17,263**	16,966	**1,223**	1,160
Sales & Distribution	**38,835**	39,693	**-**	-
Research and Development	**2,506**	2,295	**-**	-
Total	**156,018**	**157,181**	**6,396**	**6,536**

The analysis of cost of goods sold is presented below:

Analysis of Cost of Goods Sold	Group		Company	
	2023	2022	2023	2022
Production expenses	**97,414**	98,227	**5,173**	5,376*
Cost of materials and inventory sold	**170,890**	211,892	**-**	-
Total	**268,304**	**310,119**	**5,173**	**5,376**

** The production expenses in the Company refer to services provided to subsidiaries*

3.6 Payroll Expenses

Payroll expenses analysis is as follows:

Payroll expenses	Group		Company	
	2023	2022	2023	2022
Salaries & Wages	**49,519**	47,260	**2,416**	2,428
Employer's contributions	**8,497**	8,099	**390**	376
Retirement benefits	**1,269**	1,422	**14**	14
Sub-Total	**59,285**	**56,781**	**2,820**	**2,818**
Other Expenses	**896**	585	**23**	7
Total	**60,181**	**57,366**	**2,843**	**2,825**

The number of employed staff at the Group and Company level at the end of the financial year (without including the joint ventures), was as follows:

Amounts in thousand Euro, unless stated otherwise

Number of employees	Group 2023	Group 2022	Company 2023	Company 2022
Full time employees – wage based employees	**1,684**	1,682	**25**	26

3.7 Other Operating Expenses

Other Operating Expenses	Group 2023	Group 2022	Company 2023	Company 2022
Provisions for doubtful receivables	**39**	115	**-**	-
Other taxes and duties non-incorporated in operating cost	**166**	172	**-**	-
Depreciation	**369**	180	**-**	-
Staff indemnities	**365**	3	**-**	-
Supplies / other bank expenses	**104**	132	**4**	6
Expenses for the purchase of prototype materials (maquettes)	**100**	56	**-**	-
Other operating expenses	**717**	328	**15**	-
Sub-Total	**1,860**	**986**	**19**	**6**
Extraordinary and non-recurring expenses	**-**	591	**-**	-
Total	**1,860**	**1,577**	**19**	**6**

Analysis of extraordinary and non-recurring expenses	Group 2023	Group 2022
Extraordinary personnel indemnities	**-**	591
Total	**-**	591

In 2022, as part of the completion of the re-organization of the Group's holdings, costs of €591 were incurred referring to extraordinary personnel indemnities

Amounts in thousand Euro, unless stated otherwise

3.8 Financial income/(expenses)

3.8.1 Financial income

Financial income	Group		Company	
	2023	2022	2023	2022
Interest income and other related income	**648**	36	2	-
Reversal of discounted long-term receivable in relation to OAED (see note 3.16)	**1,088**	4,563	892	-
Foreign exchange differences	**1,316**	1,954	-	-
Total	**3,052**	**6,553**	**894**	**-**
Income from dividends	-	-	**12,029**	13,478

3.8.2 Financial expenses

Financial expenses	Group		Company	
	2023	2022	2023	2022
Interest expense and other related expenses	**(3,197)**	(1,937)	(20)	(55)
Foreign exchange differences	**(1,242)**	(2,004)	(22)	-
Financial result from Pension Plans	**(271)**	(476)	(2)	-
Total	**(4,710)**	**(4,417)**	**(44)**	**(55)**

3.9 Earnings per Share (Consolidated)

Earnings after tax, per share, are calculated by dividing net earnings (after tax) allocated to shareholders, by the weighted average number of shares outstanding during the respective financial year, after the deduction of any treasury shares held.

Basic earnings per share (Consolidated, continuing operations)	2023	2022
Earnings allocated to shareholders	**17,767**	25,777
Number of shares outstanding (weighted)	**42,974**	43,067
Basic and adjusted earnings per share (Euro in absolute numbers)	**0.4134**	0.5985

Amounts in thousand Euro, unless stated otherwise

Basic earnings per share (Consolidated, discontinued operations)	2023	2022
Earnings allocated to shareholders	-	(35)
Number of shares outstanding (weighted)	-	43,067
Basic and adjusted earnings per share (Euro in absolute numbers)	-	(0.0008)

Basic earnings per share (Consolidated, total operations)	2023	2022
Earnings allocated to shareholders	**17,767**	25,742
Number of shares outstanding (weighted)	**42,974**	43,067
Basic and adjusted earnings per share (Euro in absolute numbers)	**0.4134**	0.5977

As of 31st December 2023, the Company held 802,049 treasury shares.

3.10 Income Tax

The analysis of tax charged in the year's financial results, is as follows:

Income Tax	Group		Company	
	2023	2022	2023	2022
Income tax	**(5,426)**	(4,619)	**(1,299)**	(1,613)
Deferred tax (expense)/income	**2,416**	(1,179)	**5**	9
Total	**(3,010)**	**(5,798)**	**(1,294)**	**(1,604)**

The income tax for the period is calculated based on the domestically applicable tax rates. Deferred taxes are calculated on temporary differences using the applicable tax rate in the countries where the Group's companies operate.

The effective tax rate of the Group differs significantly from the nominal tax rate, as there are tax losses in the companies of the Group for which no deferred tax asset is recognized as well as significant non-tax deductible expenses.

According to Law 4799/2021, the income tax rate of the legal entities in Greece settles at 22%.

The income tax (reconciliation of the actual tax rate) is as follows:

Amounts in thousand Euro, unless stated otherwise

Income Tax under construction	Group		Company	
	2023	2022	2023	2022
Earnings / (losses) before tax	**21,336**	32,068	**12,364**	12,775
Income tax rate	**22%**	22%	**22%**	22%
Corresponding income tax	**(4,694)**	(7,055)	**(2,720)**	(2,810)
Effect due to different tax rates of subsidiaries abroad	**817**	258	**-**	(293)
Non-tax-deductible expenses	**(1,474)**	(1,020)	**(267)**	(210)
Tax paid abroad non deductible	**(23)**	-	**-**	-
Revenues not subject to tax	**1,096**	1,190	**1,922**	1,099
Income tax differences from previous years	**(331)**	307	**(229)**	-
Effect from tax losses for which no deferred tax asset has been recognized	**(101)**	(94)	**-**	-
Effect from offsetting tax losses from previous years with taxable earnings for the year	**-**	610	**-**	610
Effect due to change of tax rate of companies	**1.700**	6	**-**	-
Income Tax	**(3,010)**	(5,798)	**(1,294)**	(1,604)

From the fiscal year 2011 and onwards, the Group's Greek companies receive an "Annual Tax Certificate". The "Annual Tax Certificate" is issued from the Legal External Certified Auditor who audits the annual financial statements. Following the completion of the tax audit, the Legal External Certified Auditor grants the company with a "Tax Compliance Report" which is later submitted electronically to the Ministry of Finance.

The tax audit for the year 2022 for the Group's Greek companies Thrace Plastics Co. SA, Thrace Nonwovens & Geosynthetics Single Person SA, Thrace Plastics Pack SA, Thrace Polyfilms Single Person SA, Thrace Eurobent SA, which was conducted in accordance with the provisions of article 65a of L. 4172/2013, was completed by the audit firm "PricewaterhouseCoopers SA" and revealed no material tax liabilities apart from those recorded and depicted in the financial statements. Tax certificates were issued, with an unqualified opinion, for each of the above companies.

For the financial year 2023, a tax audit for the above companies is performed by PricewaterhouseCoopers SA in accordance with the provisions of article 65 of L. 4172/2013. This audit is ongoing and the relevant tax certificate is expected to be issued following the release of the 2023 financial statements. If until the completion of the tax audit additional tax liabilities arise, the Management of the Group estimates that such will not have a material impact on the financial statements.

The unaudited tax fiscal years are presented in the following table. For those years, the tax liabilities have not been final, and relevant tax audits by the tax authorities may take place in the future.

Amounts in thousand Euro, unless stated otherwise

Company	Tax un-audited fiscal years
Thrace Plastics Co. Sa	2018-2023
Thrace Nonwovens & Geosynthetics Single Person SA	2018-2023
Thrace Plastics Pack SA	2018-2023
Thrace Polyfilms Single Person SA	2018-2023
Thrace Protect Single Person SMPC	2018-2023
Thrace Eurobent SA	2018-2023
Thrace Greenhouses SA	2018-2023

The following table depicts the unaudited tax fiscal years for which the tax liabilities have not been finalized for the Companies outside Greece.

Company	Tax un-audited fiscal years
Don & Low LTD	2019-2023
Synthetic Holdings LTD	2019-2023
Synthetic Textiles LTD	2017-2023
Thrace Synthetic Packaging LTD	2019-2023
Thrace Polybulk A.B	2017-2023
Thrace Polybulk A.S	2019-2023
Thrace Greiner Packaging SRL.	2017-2023
Trierina Trading LTD	2018-2023
Thrace Ipoma A.D.	2018-2023
Thrace Plastics Packaging D.O.O.	2018-2023
Lumite INC	2017-2023
Thrace Linq INC	2017-2023
Adfirmate LTD	2018-2023
Pareen LTD	2018-2023
Saepe LTD	2018-2023

Amounts in thousand Euro, unless stated otherwise

3.11 Property, Plant & Equipment (PP&E)

The Group pursues economic growth in alignment with environmental responsibility. All investments are assessed towards the Group's environmental strategy with a focus, among others, on tackling climate change and serving the principles of the circular economy. At the same time, the Group constantly upgrades its PP&E, thus improving their environmental footprint, while it evaluates on a regular basis any evidence of impairment.

Technologies utilized in the context of the investments made by the Group in mechanical equipment, comprise at the same time the leading, modern technologies of the sector on a global level. At the same time, additional investments are being implemented for modernization of buildings and mechanical equipment, wherever required, but mainly for the further automation of production processes as well as recycling facilities and photovoltaic systems. Also, at the time of preparation of the present report, there have been no laws or regulations (on either European or global level) that imply or have actually led to the limitation or cessation of any production process due to inappropriate technologies utilized, currently or in future. On the contrary, the product characteristics, the new product development, the emphasis on mono-material production processes enhance significantly the ability of the Group to recycle its products or to produce new products with recycled materials in line with the principle of Circular Economy. (More information is included in paragraph 6 of the Non-Financial Report). Therefore, on 31.12.2023, the Group has not identified any indications of possible impairments or negative effects when reviewing the useful lives of the main categories of tangible fixed assets.

The changes in the PP&E during the year are analyzed as follows:

Property, Plant & Equipment (PP&E)

Group 2023	Fields – land plots	Buildings & technical facilities	Machinery	Means of Transport	Furniture & fixtures	Tangible assets under construction or installation	**Total**
ACQUISITION COST							
Acquisition cost 01.01.2023	**4,333**	**73,339**	**354,058**	**1,399**	**10,307**	**9,682**	**453,118**
Additions	126	3,212	12,070	428	500	13,557	29,893
Disposals	-	-	(4,487)	(109)	(16)	-	(4,612)
Impairments	-	-	-	-	(178)	(28)	(206)
Transfers	35	1,601	3,615	140	61	(5,563)	(111)
Foreign exchange differences	14	399	2,134	(3)	76	33	2,653
Acquisition cost 31.12.2023	**4,508**	**78,551**	**367,390**	**1,855**	**10,750**	**17,681**	**480,735**

Amounts in thousand Euro, unless stated otherwise

Property, Plant & Equipment (PP&E)							
Group 2023	Fields – land plots	Buildings & technical facilities	Machinery	Means of Transport	Furniture & fixtures	Tangible assets under construction or installation	**Total**
DEPRECIATION							
Accumulated depreciation 01.01.2023	**-**	**(32,835)**	**(241,474)**	**(1,105)**	**(8,486)**	**-**	**(283,900)**
Depreciation for the period	-	(2,262)	(19,204)	(112)	(484)	-	(22,062)
Disposals	-	-	4,330	110	14	-	4,454
Impairments	-	-	-	-	175	-	175
Transfers	-	-	(103)	-	103	-	-
Foreign exchange differences	-	(250)	(1,411)	2	(73)	-	(1,732)
Accumulated depreciation 31.12.2023	**-**	**(35,347)**	**(257,862)**	**(1,105)**	**(8,751)**	**-**	**(303,065)**
NET BOOK VALUE							
31.12.2022	4,333	40,504	112,584	294	1,821	9,682	169,218
31.12.2023	**4,508**	**43,204**	**109,528**	**750**	**1,999**	**17,681**	**177,670**

Property, Plant & Equipment (PP&E)							
Group 2022	Fields – land plots	Buildings & technical facilities	Machinery	Means of Transport	Furniture & fixtures	Tangible assets under construction or installation	**Total**
ACQUISITION COST							
Acquisition cost 01.01.2022	**4,212**	**63,380**	**333,824**	**1,411**	**9,983**	**14,588**	**427,398**
Additions	225	7,820	16,937	80	488	11,785	37,335
Disposals	(99)	-	(4,024)	(105)	(37)	-	(4,265)
Transfers	32	3,230	13,071	28	126	(16,527)	(40)
Foreign exchange differences	(37)	(1,091)	(5,750)	(15)	(253)	(164)	(7,310)
Acquisition cost 31.12.2022	**4,333**	**73,339**	**354,058**	**1,399**	**10,307**	**9,682**	**453,118**
DEPRECIATION							
Accumulated depreciation 01.01.2022	**-**	**(31,588)**	**(232,499)**	**(1,123)**	**(8,340)**	**-**	**(273,550)**

Amounts in thousand Euro, unless stated otherwise

Property, Plant & Equipment (PP&E)							
Group 2022	Fields – land plots	Buildings & technical facilities	Machinery	Means of Transport	Furniture & fixtures	Tangible assets under construction or installation	**Total**
Depreciation for the period	-	(1,927)	(17,130)	(97)	(438)	-	(19,592)
Disposals	-	-	4,284	103	36	-	4,423
Foreign exchange differences	-	680	3,871	12	256	-	4,819
Accumulated depreciation 31.12.2022	**-**	**(32,835)**	**(241,474)**	**(1,105)**	**(8,486)**	**-**	**(283,900)**
NET BOOK VALUE							
31.12.2021	4,212	31,792	101,325	288	1,643	14,588	153,848
31.12.2022	**4,333**	**40,504**	**112,584**	**294**	**1,821**	**9,682**	**169,218**

Property, Plant & Equipment (PP&E)							
Company 2023	Fields – land plots	Buildings & technical facilities	Machinery	Means of Transport	Furniture & fixtures	Tangible assets under construction or installation	**Total**
ACQUISITION COST							
Acquisition cost 01.01.2023	**-**	**392**	**11,159**	**196**	**1,281**	**-**	**13,028**
Additions	-	-	-	-	12	-	12
Disposals / Write off	-	-	(35)	-	-	-	(35)
Acquisition cost 31.12.2023	**-**	**392**	**11,124**	**196**	**1,293**	**-**	**13,005**
DEPRECIATION							
Accumulated depreciation 01.01.2023	**-**	**(259)**	**(11,124)**	**(196)**	**(1,147)**	**-**	**(12,726)**
Depreciation for the period	-	(13)	-	-	(36)	-	(49)
Accumulated depreciation 31.12.2023	**-**	**(272)**	**(11,124)**	**(196)**	**(1,183)**	**-**	**(12,775)**
NET BOOK VALUE							
31.12.2022	-	133	35	-	134	-	302
31.12.2023	**-**	**120**	**-**	**-**	**110**	**-**	**230**

Amounts in thousand Euro, unless stated otherwise

Property, Plant & Equipment (PP&E)							
Company 2022	Fields – land plots	Buildings & technical facilities	Machinery	Means of Transport	Furniture & fixtures	Tangible assets under construction or installation	**Total**
ACQUISITION COST							
Acquisition cost 01.01.2022	**-**	**392**	**11,159**	**221**	**1,250**	**-**	**13,022**
Additions	-	-	-	-	31	-	31
Disposals	-	-	-	(25)	-	-	(25)
Acquisition cost 31.12.2022	**-**	**392**	**11,159**	**196**	**1,281**	**-**	**13,028**
DEPRECIATION							
Accumulated depreciation 01.01.2022	**-**	**(247)**	**(11,124)**	**(216)**	**(1,108)**	**-**	**(12,695)**
Depreciation for the period	-	(12)	-	(3)	(39)	-	(54)
Disposals	-	-	-	23	-	-	23
Accumulated depreciation 31.12.2022	**-**	**(259)**	**(11,124)**	**(196)**	**(1,147)**	**-**	**(12,726)**
NET BOOK VALUE							
31.12.2021	-	145	35	5	142	-	327
31.12.2022	**-**	**133**	**35**	**-**	**134**	**-**	**302**

There are no liens and guarantees on the Company's PP&E, while the liens on the Group's PP&E amount to € 2,263.

Amounts in thousand Euro, unless stated otherwise

3.12 Leases

The right-of-use assets are analyzed as follows:

Right-of-use assets					
Group 2023	Buildings and technical facilities	Machinery	Means of Transport	Furniture & fixtures	**Total**
ACQUISITION COST					
Acquisition cost 01.01.2023	**1,260**	**486**	**3,481**	**62**	**5,289**
Additions	42	-	1,297	16	1,356
Amendment of lease contracts	132	-	-	-	132
Derecognition	-	-	(175)	(15)	(190)
Foreign exchange differences	(16)	-	11	-	(5)
Acquisition cost 31.12.2023	**1,418**	**486**	**4,614**	**63**	**6,582**
DEPRECIATION					
Accumulated depreciation 01.01.2023	**(745)**	**(78)**	**(1,894)**	**(51)**	**(2,768)**
Depreciation for the period	(275)	(34)	(751)	(12)	(1,072)
Amendment of lease contracts	220	-	-	-	220
Derecognition	-	-	178	14	192
Foreign exchange differences	5	-	(4)	-	1
Accumulated depreciation 31.12.2023	**(795)**	**(112)**	**(2,471)**	**(49)**	**(3,428)**
NET BOOK VALUE					
31.12.2022	515	408	1,587	11	2,521
31.12.2023	**623**	**374**	**2,143**	**14**	**3,154**

Amounts in thousand Euro, unless stated otherwise

Right-of-use assets					
Group 2022	Buildings and technical works	Machinery	Means of Transport	Furniture and other equipment	**Total**
ACQUISITION COST					
Acquisition cost 01.01.2022	**1,266**	**486**	**3,242**	**62**	**5,056**
Additions	6	-	445	-	451
Derecognition	-	-	(175)	-	(175)
Foreign exchange differences	(12)	-	(31)	-	(43)
Acquisition cost 31.12.2022	**1,260**	**486**	**3,481**	**62**	**5,289**
DEPRECIATION					
Accumulated depreciation 01.01.2022	**(496)**	**(44)**	**(1,431)**	**(35)**	**(2,006)**
Depreciation for the period	(254)	(34)	(627)	(13)	(928)
Derecognition	-	-	145	-	145
Foreign exchange differences	5	-	19	(3)	21
Accumulated depreciation 31.12.2022	**(745)**	**(78)**	**(1,894)**	**(51)**	**(2,768)**
NET BOOK VALUE					
31.12.2021	770	442	1,811	27	3,051
31.12.2022	**515**	**408**	**1,587**	**11**	**2,521**

Amounts in thousand Euro, unless stated otherwise

Right-of-use assets			
Company 2023	**Buildings and technical works**	**Means of Transport**	**Total**
ACQUISITION COST			
Acquisition cost 01.01.2023	**622**	**137**	**759**
Additions	41	99	140
Amendment of lease contracts	(95)	-	(95)
Acquisition cost 31.12.2023	**568**	**236**	**804**
DEPRECIATION			
Accumulated depreciation 01.01.2023	**(461)**	**(76)**	**(537)**
Depreciation for the period	(97)	(45)	(142)
Amendment of lease contracts	207	-	207
Accumulated depreciation 31.12.2023	**(351)**	**(121)**	**(472)**
NET BOOK VALUE			
31.12.2022	161	61	222
31.12.2023	**217**	**115**	**332**

Right-of-use assets			
Company 2022	**Buildings and technical works**	**Means of Transport**	**Total**
ACQUISITION COST			
Acquisition cost 01.01.2022	**622**	**117**	**739**
Additions	-	20	20
Acquisition cost 31.12.2022	**622**	**137**	**759**
DEPRECIATION			
Accumulated depreciation 01.01.2022	**(346)**	**(49)**	**(395)**
Depreciation for the period	**(115)**	**(27)**	**(142)**
Accumulated depreciation 31.12.2022	**(461)**	**(76)**	**(537)**
NET BOOK VALUE			
31.12.2021	276	68	344
31.12.2022	**161**	**61**	**222**

The consolidated and stand-alone statements of financial position of year 2023, includes the following amounts related to lease liabilities:

Amounts in thousand Euro, unless stated otherwise

Lease Liabilities	Group		Company	
	2023	2022	2023	2022
Short-term liabilities	**1,140**	967	**143**	147
Long-term liabilities	**1,885**	1,470	**179**	76
Total liabilities from Leases	**3,025**	**2,437**	**322**	**223**

The interest expense related to lease liabilities of the Group and the Company amounts to € 100 (2022: € 87) and € 13 (2022: € 10) respectively.

The expenses related to short-term leases of the Group amount to € 1,222 (2022: € 1,183) and are included in the cost of goods sold and administrative and sales & distribution expenses. The expenses related to short-term leases of the Company amount to €15 (2022: €20) and are included in the administrative expenses.

The maturity of liabilities from leases is analyzed in Note 3.31.

3.13 Intangible Assets

The changes in the intangible assets during the year are analyzed as follows:

Intangible Assets	Group			Company	
	Concessions & industrial property rights	Company goodwill	Total	Concessions & industrial property rights	Total
ACQUISITION COST					
Acquisition cost 31.12.2022	**3,267**	**9,720**	**12,987**	**1,589**	**1,589**
Additions	113	-	113	-	-
Transfers	111	-	111	-	-
Impairments	(10)	-	(10)	-	-
Foreign exchange difference	14	(48)	(34)	-	-
Acquisition cost 31.12.2023	**3,495**	**9,672**	**13,168**	**1,589**	**1,589**
AMORTIZATION					
Accumulated amortization 31.12.2022	**(2,631)**	**-**	**(2,631)**	**(1,441)**	**(1,441)**
Amortization for the period	(220)	-	(220)	(61)	(61)
Transfers	-	-	-	-	-

Amounts in thousand Euro, unless stated otherwise

Intangible Assets	Group			Company	
	Concessions & industrial property rights	Company goodwill	Total	Concessions & industrial property rights	Total
Impairments	10	-	10	-	-
Foreign exchange differences	(11)	-	(11)	-	-
Accumulated amortization 31.12.2023	**(2,852)**	**-**	**(2,852)**	**(1,502)**	**(1,502)**
NET BOOK VALUE					
31.12.2022	637	9,720	10,357	148	148
31.12.2023	**643**	**9,672**	**10,316**	**87**	**87**

Intangible Assets	Group			Company	
	Concessions & industrial property rights	Company goodwill	Total	Concessions & industrial property rights	Total
ACQUISITION COST					
Acquisition cost 31.12.2021	**3,129**	**9,815**	**12,944**	**1,589**	**1,589**
Additions	185	-	185	-	-
Transfers	40	-	40	-	-
Impairments	(50)	-	(50)	-	-
Foreign exchange difference	(37)	(95)	(132)	-	-
Acquisition cost 31.12.2022	**3,267**	**9,720**	**12,987**	**1,589**	**1,589**
AMORTIZATION					
Accumulated amortization 31.12.2021	**(2,405)**	**-**	**(2,405)**	**(1,327)**	**(1,327)**
Amortization for the period	(333)	-	(333)	(114)	(114)
Impairments	50	-	50	-	-
Foreign exchange differences	57	-	57	-	-
Accumulated amortization 31.12.2022	**(2,631)**	**-**	**(2,631)**	**(1,441)**	**(1,441)**

Amounts in thousand Euro, unless stated otherwise

Intangible Assets	Group			Company	
	Concessions & industrial property rights	Company goodwill	Total	Concessions & industrial property rights	Total
NET BOOK VALUE					
31.12.2021	724	9,815	10,539	262	262
31.12.2022	**637**	**9,720**	**10,357**	**148**	**148**

The Group tests on an annual basis the goodwill for impairment according to the Group's respective accounting principle (see note 2.6).

The goodwill included in the consolidated Financial Statements, following an acquisition, has been allocated in the following cash flow generating units (CFGU) (subsidiary companies).

Goodwill per Subsidiary	2023
Don & Low LTD	**7,490**
Trierina Trading LTD	**798**
Thrace Polybulk AB	**622**
Thrace Polybulk AS	**680**
Thrace Nonwovens & Geosynthetics Single Person S.A.	**50**
Other	**32**
Total	**9,672**

Major Assumptions

The recoverable value of a cash flow generating unit is determined according to the calculation of the value in use. This calculation uses provisions of cash flows before taxes, based on 5-year financial budgets, which have been approved by the Management and then extrapolated into perpetuity.

Estimates of future sales are provided by the Management and reflect Management's best estimates. Factors taken into account are the following: historical trends, inflation, competition, increases in production costs, etc. Evolution of production cost, transport cost and raw material cost is being determined by forecasts provided by international agencies and institutions. In addition, there is consideration of actions taken in order to mitigate the interruption of the supply chain and limit the environmental footprint of the Group. As mentioned above, there is no indication of any impairment in the goodwill of the Group's subsidiaries as a result of the climate change or in the context of the relevant legislative framework, as in force.

The value in use for the cash flow generating units is being affected from basic factors such as the growth rate to perpetuity which has been set at 0.5%, the projections with regard to the forecasted quantities and sales prices according to the 5-year investment plan of the group, the gross profit margin and the discount rates.

Amounts in thousand Euro, unless stated otherwise

The discount rates reflect the current estimations of the market for the separate risks of each cash flow generating unit. The calculation of the discount rates is based on the certain conditions in which the Group operates along with its operating segments, and is being extracted from the weighted average cost of capital (WACC). The weighted average cost of capital is based on both the debt and the equity. The cost of equity derives from the expected return required by the Group's investors for their investment. The cost of debt is based on the interest rate of the Group's loans that are being repaid. The country's risk premium is incorporated with the application of individual beta sensitivity factors. Beta sensitivity factors (or beta coefficient) are being reviewed annually according to the published market data.

The above assumptions vary depending on the different market conditions prevailing in the countries which the Group operates in. The Group uses the services of an independent valuator who utilizes the Discounted Cash Flow method and values the companies based on the future cash flows in order to determine the value in use.

The basic assumptions used are consistent with independent external sources of information, and are analyzed below per cash flow generating unit (CFGU).

Assumptions – Don & Low LTD	**2023**	**2022**
Discount rate, weighted average	8.8%	8.9%
Annual revenue growth rate	14%	10.6%
Earnings before interest, taxes, depreciation and amortization (5-years)	10.5% – 13.5%	15% - 16%
Assumptions – Trierina Trading LTD / Thrace Ipoma A.D.		
Discount rate, weighted average	8.2%	7.2%
Annual revenue growth rate	9.8%	8.8%
Earnings before interest, taxes, depreciation and amortization (5-years)	21%	16.6%
Assumptions – Thrace Polybulk AS		
Discount rate, weighted average	7.6%	8.4%
Annual revenue growth rate	7%	5.9%
Earnings before interest, taxes, depreciation and amortization (5-years)	15% - 16%	10%
Assumptions – Thrace Polybulk AB		
Discount rate, weighted average	6.7%	7.3%
Annual revenue growth rate	7.7%	4.8%
Earnings before interest, taxes, depreciation and amortization (5-year)	7% - 7.6%	5.7% - 5.9%

Based on the results of the impairment testing, as of December 31, 2023, no impairment losses emerged in the book value of the goodwill of the above cash flow generating units.

Amounts in thousand Euro, unless stated otherwise

On December 31, 2023, the recoverable amount for the specific cash flow generating units compared to the corresponding book values, indicates that there is a significant headroom and any substantial change in the assumptions used would not result in an impairment in the book value of goodwill.

The Group analyzed the sensitivity of the recoverable amounts of each Cash Flow Generating Unit (CFGU) in relation to a rational and probable change in one of the major assumptions (as an indication it is noted the best case scenario which refers to 5% sales growth and 2% increase of gross profit, as well as the worst case scenario which refers to the corresponding opposite and unfavorable changes). In addition, sensitivity is calculated according to a 0.5% change in the growth rate in perpetuity and according to a 2% change in the discount rate. As a result of the sensitivity analysis, the recoverable amount for the above cash flow generating units (CFGU) compared to their respective book value, indicates a sufficient headroom.

3.14 Other Long-Term Receivables

Other Long-Term Receivables are presented in the table below:

Other Long-Term Receivables	Group		Company	
	2023	2022	2023	2022
Other accounts receivable	**138**	132	**42**	39
Total	**138**	**132**	**42**	**39**

The above long-term receivables mainly concern guarantees granted to third parties.

3.15 Inventories

Inventories	Group		Company	
	2023	2022	2023	2022
Merchandise	**8,096**	10,419	**-**	-
Finished and semi-finished products	**31,609**	33,277	**-**	-
Raw & auxiliary materials	**33,670**	32,527	**-**	-
Provision for impairment of inventory	**(2,834)**	(2,703)	**-**	-
Spare parts – other inventory	**1,463**	2,895	**-**	-
Total	**72,003**	**76,415**	**-**	-

Provision for Impairment of Inventory	Group	Company
Opening Balance 1.1.2022	**1,852**	-
Additional provisions	951	-
Foreign Exchange Differences	(100)	-
Total 31.12.2022	**2,703**	**-**
Additional provisions	338	-

Amounts in thousand Euro, unless stated otherwise

Provision for Impairment of Inventory	Group	Company
Reverse Entry of Provision	(250)	-
Foreign Exchange Differences	43	-
Total 31.12.2023	**2,834**	-

It is noted that, according to the European and national legislation in effect, there are no product categories subject to any restrictions, with regard to their usage and distribution in the market place, due to their impact on the environment, currently or in the future. As a result, no requirement for impairment has emerged.

3.16 Trade and other receivables

3.16.1 Trade Receivables

Trade Receivables	Group		Company	
	2023	**2022**	**2023**	**2022**
Customers	**69,631**	72,459	**2,818**	2,362
Provisions for doubtful debts	**(7,452)**	(7,690)	**(2,307)**	(2,307)
Total	**62,179**	**64,769**	**511**	**55**

The customers' balance at a Group level included notes and checks overdue of € 7,149 for the year 2023 and of € 7,993 for the year 2022.

Classification of Customer receivables

Receivables from customers consist of the amounts due from customers from the sale of products that occur within the normal operation of the Group. In general, credit terms range from 30 to 180 days and therefore trade receivables are classified as short-term.

Receivables from customers are initially recognized in the transaction amount if the Group has the unconditional right to receive the transaction price. The Group holds the receivables from customers in order to collect the contractual cash flows and therefore measures them at amortized cost using the effective interest rate method.

The dispersion of the Group's sales is deemed as satisfactory. There is no concentration of sales into a limited number of customers and therefore there is no increased risk of income loss or increased credit risk.

Fair value of receivables from customers

Given their short-term nature, the fair value of receivables approximates book value.

Impairment of receivables from customers

For the accounting policy on impairment of receivables from customers, see note 2.20.3.

For information on financial risk management, see note 3.31.

Amounts in thousand Euro, unless stated otherwise

3.16.2 Other receivables

Other receivables	Group		Company	
	2023	2022	2023	2022
Debtors	**1,418**	2,638	**22**	1,361
OAED (Greek Manpower Employment Organization) subsidies receivable	**-**	1,202	**-**	851
Investment Grants Receivable	**987**	2,353	**-**	-
Time Deposits at Bank	**13,269**	-	**-**	-
V.A.T and Other Taxes receivables other than Income Tax	**577**	2,838	**68**	115
Prepaid expenses	**2,272**	2,914	**100**	53
Interim dividend - Dividends	**3,000**	-	**3,000**	1,725
Total	**21,523**	11,945	**3,190**	4,105

OAED (Greek Manpower Employment Organization) subsidies receivable was formed due to a 12% grant on the payroll cost concerning the personnel employed in Xanthi and was to be collected from the above organization.

The above concern "older" and mature receivables of the Group (up to the year 2015), which due to the delays that occurred in the repayment of subsidy receivables from the State, were reclassified in the previous fiscal years from the current receivables to non-current receivables. At the same time a provision for impairment of a part of those receivables was formed, with the final balance at the end of the year 2021 standing at €4,879.

On July 17, 2020, the Law 4706/2020 was voted, according to which the outstanding receivables of the beneficiaries until 31.12.2015 will be offset against existing and future receivables of the State, by the entry into force of the above law.

The liabilities of OAED (Greek Manpower Employment Organization) and the Greek State are exhausted according to the provisions of article 87, paragraph 2 of Law 4706/2020. The companies of the Group have implemented the procedures provided by Law 4706/2020, in accordance with the circulars issued by OAED, in order to certify the correctness of the claimed amounts by comparing the already submitted statements. The amount receivable for the Group was finalized at €10,530.

During the offsetting process, the Group companies initially utilized their receivables originating from OAED (Greek Manpower Employment Organization) by proceeding into a corresponding reduction of their obligations in terms of taxes or social security contributions on a per case basis. At a later stage, any amount exceeding the level of receivables recorded in each company's accounting books, was depicted as financial income (i.e. reverse entry of the previously formed provision for impairment).

During the current financial year, the offsetting process was completed, eliminating the respective receivable, while at the same time a financial income of € 1,088 for the Group and € 892 for the Company was generated.

Amounts in thousand Euro, unless stated otherwise

The table below presents the relevant accounting movements:

OAED (Greek Manpower Employment Organization) subsidies receivable	GROUP
Asset on 31.12.2021 (note 3.15 of financial statements 31.12.2022)	**4,879**
Financial Income Fiscal year 2022	**4,563**
Financial Income Fiscal year 2023	**1,088**
Amounts definitively approved to offset liabilities	**10,530**

The investment grant receivable concerns a grant receivable of Law 3299/2004 of the subsidiary Thrace Plastics Pack SA concerning an implemented investment.

An amount of € 13,269 has been included in the time deposits. The amount concerns a bank time deposit which was concluded during the current financial year, with a duration greater than 3 months and as a result is not currently included in the cash and cash equivalents.

Prepaid expenses mainly concern government grants receivable and other prepaid expenses.

3.16.3 Analysis of Provisions for Doubtful Receivables and other receivables

Analysis of Provisions for Doubtful Receivables	Group	Company
Opening balance 1.1.2022	**7,721**	**2,317**
Additional Provisions	115	-
Reverse Entry of Provision	(90)	-
Provisions utilized	(41)	(10)
Foreign Exchange Differences	(15)	-
Total 31.12.2022	**7,690**	**2,307**
Opening balance 1.1.2023	**7,690**	**2,307**
Additional Provisions	70	-
Reverse Entry of Provision	(255)	-
Provisions utilized	(52)	-
Foreign Exchange Differences	(1)	-
Total 31.12.2023	**7,452**	**2,307**

Amounts in thousand Euro, unless stated otherwise

3.17 Cash & cash equivalents

Cash & cash equivalents	Group		Company	
	2023	2022	2023	2022
Cash in hand	**17**	21	**4**	5
Current and time deposits (less than 3 months)	**27,784**	39,589	**238**	1,422
Total	**27,801**	**39,610**	**242**	**1,427**

Cash and Cash Equivalents do not include an amount of € 13,269 that concerns time deposits which have been formed during the current financial year with a duration of more than three months. The relevant amount has been reclassified to other receivables.

Credit rating of cash & cash equivalents

Approximately 21% of the Group's cash and cash equivalents are deposited in the Greek systemic banks within the Greek region. The Group's Management considers that there are no risks associated with the above deposits in the current period.

Further, cash & cash equivalents are categorized according to the credit rating of banks (conducted by Fitch) where the relevant deposits are placed.

Credit rating of cash & cash equivalents	Group		Company	
	2023	2022	2023	2022
AA-	**1,023**	1,086	**-**	-
A+	**3,487**	348	**-**	-
A	**9,632**	25,538	**-**	-
A-	**4,532**	1,254	**-**	-
B-	**-**	-	**-**	
BB-	**4,861**	4,252	**109**	53
BBB+	**2,444**	1,078	**-**	-
B	**-**	2,706	**-**	134
BB	**1,805**	3,327	**129**	1,235
Total	**27,784**	**39,589**	**238**	**1,422**

Amounts in thousand Euro, unless stated otherwise

3.18 Share Capital and Share Premium Reserve

The Company's share capital accounted for 28,869,358.32 Euro (absolute number) on 31 December 2023 divided by 43,741,452 common registered shares with nominal value of 0.66 Euro per share.

The treasury shares that Company holds are presented below:

Treasury Shares	Quantity	Value (In Th. €)
Opening Balance	**751,396**	**3,311**
Acquired during the year	50,653	237
Ending Balance	**802,049**	**3,548**

3.19 Reserves

3.19.1 Statutory Reserves

In accordance with the provisions of Greek Law, the creation of a statutory reserve – by transferring to such a reserve an amount equal to 5% of the annual after tax profits realized – is mandatory until the time when the reserve balance amount to the 1/3 of the Company's share capital. The statutory reserve can be distributed only upon the dissolution of the Company. However, it can be used to offset accumulated losses.

3.19.2 Tax-exempt and Other Reserves

These reserves were formed by the application of special provisions of tax laws for special incentive laws. In case of their distribution, they will be taxed with the tax rate prevailing at the time of their distribution.

3.19.3 Foreign exchange difference reserves

These reserves are formed as a result of the conversion into EUR of the Assets, Liabilities and net income of international subsidiaries with different operating currency for each of them, based on the exchange rate according to the accounting policies mentioned in note 2.11.3.

3.20 Bank Debt

The Group's long term loans have been granted from Greek and international banks. The repayment time varies, according to the loan contract, while most loans are linked to Euribor plus a spread.

The Group's short term loans have been granted from Greek and international banks with interest rates of Euribor or Libor plus a spread. The book value of loans approaches their fair value at 31 December 2023.

Analytically, bank debt at the end of the year was as follows:

Amounts in thousand Euro, unless stated otherwise

Debt	Group		Company	
	2023	2022	2023	2022
Long-term debt	27,790	31,641	-	-
Total long-term debt	**27,790**	**31,641**	**-**	**-**
Short term portion of long term debt	14,323	15,239	-	-
Short-term debt	12,232	11,750	-	1,022
Total short-term debt	**26,555**	**26,989**	**-**	**1,022**
Grand Total	**54,345**	**58,630**	**-**	**1,022**

The Group proceeded to sign loan agreements within the framework of the National Recovery and Resiliency Plan "Greece 2.0", in order to partially cover its capital needs for financing its CAPEX regarding the construction of "net metering" photovoltaic systems. As a loan that is under the framework of co-financing of the systemic banks with the Recovery and Resilience Fund (RAF), a total amount of approximately € 4,800 was approved and until 31.12.2023 an amount of approximately € 4,040 was granted.

The Group recognized an indirect grant, amounted to € 510, as calculated from the difference between the contractual co-financing rate and the RAF rate, while on 31.12.2023 the balance of the grant amounted to € 459.

In addition, at short-term loans include an amount of € 6,588 which relates to a Factoring arrangement of Thrace Plastics Pack SA with ABC Factors, which has been received by the aforementioned subsidiary and corresponds to receivables factored with recourse.

The maturity of the loans is as follows:

Maturity of Loans	Group		Company	
	2023	2022	2023	2022
Up to 1 year	**26,554**	26,989	-	1,022
From 1 – 3 years	**17,877**	16,587	-	-
Over 3 years	**9,914**	15,054	-	-
Total Debt	**54,345**	**58,630**	**-**	**1,022**

Interest rates are linked to Euribor or Libor on a per case basis and range from 1.70% to 2.3%. It is noted that 13% of the Group's loans carry a fixed interest rate ranging from 0.35% to 2.5%.

The majority of the Group's loans are linked to covenants which on December 31, 2023 were fully met.

Amounts in thousand Euro, unless stated otherwise

3.21 Pension Liabilities

The liabilities of the Company and the Group towards its employees in providing them with certain future benefits, depending on the length of service are calculated by an actuarial study on an annual basis. The accounting treatment is made on the basis of the accrued entitlement of each employee, as at the Balance Sheet date, that is anticipated to be paid, discounted to its present value by reference to the anticipated time of payment.

The liability for the Company and the Group, as included in the Statement of Financial Position, is analyzed as follows:

Employee Benefits	Group		Company	
	2023	2022	2023	2022
Defined benefit plans – Unfunded	1,658	1,385	**99**	**79**
Defined benefit plans – Funded	(9,533)	(7,169)	**-**	-
Total provision at the end of the year	**(7,875)**	**(5,784)**	**99**	**79**

3.21.1 Defined benefit plans – Unfunded

The Greek companies of the Group as well as the subsidiary Thrace Ipoma A.D. domiciled in Bulgaria participate in the following plan.

Defined benefit plans – Unfunded	Group		Company	
	2023	2022	2023	2022
Amounts recognized in the balance sheet				
Present value of liabilities	1,658	1,385	99	79
Net liability recognized in the balance sheet	**1,658**	**1,385**	**99**	**79**
Amounts recognized in the financial results				
Cost of current employment	193	231	14	14
Net interest on the liability / (asset)	47	8	2	-
Ordinary expense in the Statement of Comprehensive Income	**240**	**239**	**16**	**14**
Recognition of prior service cost	-	-	-	-
Cost of curtailment / settlements / service termination	307	575	-	-
Other expense / (income)	-	-	-	-
Total expense in the the Statement of Comprehensive Income	**547**	**814**	**16**	**14**

Amounts in thousand Euro, unless stated otherwise

Defined benefit plans – Unfunded	Group		Company	
	2023	2022	2023	2022
Change in the present value of the liability				
Present value of liability at the beginning of period	**1,385**	**1,599**	**79**	**79**
Cost of current employment	193	231	14	15
Interest cost	**47**	**8**	**2**	**-**
Benefits paid from the employer	(366)	(764)	-	-
Cost of curtailment / settlements / service termination	306	575	-	-
Other expense / (income)	1	-	-	-
Cost of prior service during the period	-	-	-	-
Actuarial loss / (profit) – financial assumptions	61	(236)	-	(10)
Actuarial loss / (profit) – demographic assumptions	-	(53)	-	-
Actuarial loss / (profit) – evidence from the period	31	26	4	(5)
Present value of liability at the end of period	**1,658**	**1,385**	**99**	**79**
Adjustments				
Adjustments profit / (loss) in the liabilities due to change of assumptions	(67)	289	(4)	10
Empirical adjustments profit / (loss) in liabilities	(25)	(25)	-	5
Other	-	-	-	-
Total actuarial profit / (loss) in Equity	**(92)**	**264**	**(4)**	**15**
Changes in the Net Liability recognized in the Statement of Financial Position				
Net liability / receivable at the beginning of year	1,385	1,599	79	79
Benefits paid from the employer - Other	(366)	(764)	-	-
Total expense recognized in the Statement of Comprehensive Income	**547**	**814**	**16**	**15**
Total amount recognized in Equity	92	(264)	4	(15)
Other	-	-	-	-
Net liability at the end of year	**1,658**	**1,385**	**99**	**79**
Cumulative amount in Equity (Profit / (Loss))	**78**	**(59)**	**19**	**22**
Cash flows				
Expected benefits from the plan in the following year	80	45	-	-

The actuarial assumptions are presented in the following table.

Amounts in thousand Euro, unless stated otherwise

Actuarial Assumptions	Greek Companies		Thrace Ipoma AD	
	2023	2022	2023	2022
Discount rate	3.97%	3.20%	4.5%	6.00%
Inflation	2.40%	2.60%	4.7%	16.9%
Average annual increase of personnel salaries	3.40%	2.60%	12%	2.00%
Duration of liabilities	4.9 years	5.2 years	8.9 years	7.4 years

It is noted that a change of 0.5% in the discount rate would result into a change in the present value of liabilities by 2.9%-3%, while a change of 0.5% in the average annual increase of personnel salaries would lead to a change in the present value of liabilities by 2.6%-2.7%.

3.21.2 Defined benefit plans – Funded

The subsidiaries Don & Low LTD and Thrace Polybulk AS have formed Pension Plans of defined benefits which operate as stand-alone legal entities in the form of trusts. Therefore the assets of the plans are not related to the assets of the companies.

The accounting treatment of the plans according to the revised IAS 19 is as follows:

Defined benefit plans – Funded	Group	
	2023	2022
Amounts recognized in the Statement of Financial Position		
Present value of liabilities	103,792	102,648
Fair value of the plan's assets	(113,325)	(109,817)
Net liability recognized in the Statement of Financial Position	**(9,533)**	**(7,169)**
Amounts recognized in the financial results		
Cost of current employment	90	118
Net interest on the liability / (asset)	(344)	1
Ordinary expense in the Statement of Comprehensive Income	**(254)**	**119**
Cost of recognition from previous years	-	-
Cost of curtailment / settlements / service termination	-	-
Other expense / (income)	575	469
Foreign exchange differences	-	-
Total expense in the Statement of Comprehensive Income	**321**	**588**

Amounts in thousand Euro, unless stated otherwise

Defined benefit plans – Funded	Group	
	2023	2022
Change in the present value of the liability		
Present value of liability at the beginning of period	102,648	160,955
Cost of current employment	87	115
Interest cost	5,097	2,838
Benefits paid from the plan	(5,403)	(5,863)
Cost of curtailment / settlements / service termination	-	-
Other expense / (income)	(20)	(24)
Actuarial loss / (profit) – financial assumptions	1,839	(60,038)
Actuarial loss / (profit) – demographic assumptions	(2,299)	2,932
Actuarial loss / (profit) – evidence from the period	(141)	8,193
Foreign exchange differences	1,984	(6,460)
Present value of liability at the end of period	**103,792**	**102,648**
Change in the value of assets		
Present value of the plan's assets at the beginning of period	109,817	159,055
Income from interest	5,441	2,838
Return on assets	739	(40,718)
Employer's contributions	604	1,224
Employees' contributions	-	-
Benefits paid from the plan	(5,403)	(5,863)
Foreign exchange differences	2,127	(6,719)
Present value of assets at the end of period	**113,325**	**109,817**
Adjustments		
Adjustments profit / (loss) in the liabilities due to change of assumptions	601	48,913
Empirical adjustments profit / (loss) in liabilities	-	-
Empirical adjustments profit / (loss) in assets	1,445	(40,718)
Total actuarial profit / (loss) in Equity	**2,046**	**8,195**
Cost recognition from previous years	-	-
Foreign exchange differences	-	-
Total amount recognized in Equity	**2,046**	**8,195**
Asset allocation*		
Mutual Funds (Equities)	14,046	13,490

Amounts in thousand Euro, unless stated otherwise

Defined benefit plans – Funded	Group	
	2023	2022
Mutual Funds (Bonds)	79,762	64,547
Diversified Growth Funds	13,997	22,438
Other	5,520	9,342
Total	**113,325**	**109,817**
Changes in the Net Liability recognized in Statement of Financial Position		
Net liability / (receivable) at the beginning of year	(7,169)	1,900
Contributions from the employer / Other	(495)	(1,720)
Total expense recognized in the Statement of Comprehensive Income	321	588
Total amount recognized in Equity	(2,046)	(8,195)
Foreign exchange differences	(144)	258
Net liability / (asset) at the end of year	**(9,533)**	**(7,169)**
Cumulative amount in Equity (Profit / (Loss)	**17,130**	**27,087**
Cash flows		
Expected benefits from the plan in the following year	(5,638)	(5,637)

* *The assets of the plan are measured at fair values and include mainly mutual funds of Baillie Gifford, of Legal & General Investment Management as well as of Ninety One plc.*

The category "Other" also includes the plan's cash reserves.

The actuarial assumptions are presented in the following table.

Actuarial Assumptions	Don & Low LTD		Thrace Polybulk AS	
	2023	2022	2023	2022
Discount rate	4.80%	5.02%	3.10%	3.00%
Inflation	3.02%	3.14%	2.25%	3.00%
Average annual increase of personnel salaries	3.02%	3.14%	3.50%	4.00%
Duration of liabilities	14 years	14 years	10 years	10 years

It is noted that a change of 0.50% in the discount rate would have resulted into a change in the present value of liabilities by 6.5%-7.1%.

Amounts in thousand Euro, unless stated otherwise

3.22 Deferred Taxes

Group

The following amounts are recorded in the consolidated Statement of Financial Position, after any offsetting entries wherever required:

Deferred Taxation	2023	2022
Deferred tax assets	**1,783**	1,322
Deferred tax liabilities	**(9,367)**	(10,625)
Total deferred taxation	**(7,584)**	**(9,303)**

A. Change of deferred tax in the financial results	2023	2022
As at January 1st	**(9,303)**	**(6,362)**
Change in the financial results	2,416	(1,179)
Foreign exchange differences	(162)	442
Change in the Statement of Comprehensive Income	(535)	(2,204)
As at December 31st	**(7,584)**	**(9,303)**

B. Deferred tax (liabilities)	Liabilities for employee benefits	Amortization	Other	Total
As at January 1st, 2022		**(7,924)**	**(699)**	**(8,623)**
Change in the Statement of Comprehensive Income	(42)	(1,418)	390	(1,070)
Foreign exchange differences	62	370	(16)	416
Change in Statement of Comprehensive Income	(1,374)	26	-	(1,348)
As at December 31st, 2022	**(1,354)**	**(8,946)**	**(325)**	**(10,625)**
Change in the Statement of Comprehensive Income	42	1,127	1,246	2,415
Foreign exchange differences	(64)	(144)	33	(175)
Change in other comprehensive income	(983)	1	-	(982)
As at December 31st, 2023	**(2,359)**	**(7,962)**	**954**	**(9,367)**

Amounts in thousand Euro, unless stated otherwise

credit losses based on the expected credit losses for the entire lifetime of these items. Regarding the remaining financial assets, the expected credit losses are being calculated according to the losses of the next 12 months. The expected credit losses of the following 12 months is part of the anticipated credit losses for the entire life of the financial assets, which emanates from the probability of a default in the payment of the contractual obligations within the next 12-month period starting from the reporting date. In case of a significant increase in credit risk since the initial recognition, the provision for impairment will be based on the expected credit losses of the entire life of the asset.

At the date of the preparation of the financial statements, impairment of receivables from customers and other financial assets was made on the basis of the above.

The following table presents an analysis of the maturity of customers at 31/12/2023.

Maturity of Trade Receivables' Balances 31.12.2023	Group	Company
01 – 30 days	18,385	18
31 – 90 days	35,046	488
91 – 180 days	8,876	-
180 days and over	7,324	2,312
Subtotal	**69,631**	**2,818**
Provisions for doubtful receivables	(7,452)	(2,307)
Total	**62,179**	**511**

The analysis of provisions is depicted in the following table:

Analysis of Provisions	Expected credit losses	Percentage of expected credit losses
01 – 30 days	3	0.02 %
31 – 90 days	78	0.22 %
91 – 180 days	377	4.25 %
180 days and above	6,994	95.51 %
Total	**7,452**	**100.00 %**

The above amounts are expressed in terms of due days in the table below:

Amounts in thousand Euro, unless stated otherwise

Analysis of not past due/overdue trade receivables 31.12.2023	Group	Company
Receivables to be collected on time	46,545	505
Overdue receivables 1 – 30 days	11,856	-
Overdue receivables 31 – 90 days	3,765	-
Overdue receivables above 91 days	7,465	2,313
Subtotal	**69,631**	**2,818**
Provisions for doubtful customer receivables	(7,452)	(2,307)
Total	**62,179**	**511**

With regard to uninsured receivables overdue more than 90 days, which the Group has classified as doubtful, relevant provisions have been made which are deemed as sufficient.

Correspondingly, the amounts of maturity and past due for the financial year 2022 are presented in the following tables:

Maturity of Trade Receivables' Balances 31.12.2022	Group	Company
01 – 30 days	19,708	50
31 – 90 days	37,429	-
91 – 180 days	8,196	-
180 days and over	7,126	2,312
Subtotal	**72,459**	**2,362**
Provisions for doubtful receivables	(7,690)	(2,307)
Total	**64,769**	**55**

Analysis of not past due/overdue trade receivables 31.12.2022	Group	Company
Receivables not pas due	52,008	50
Overdue receivables 1 – 30 days	9,838	-
Overdue receivables 31 – 90 days	3,015	-
Overdue receivables above 91 days	7,598	2,312
Subtotal	**72,459**	**2,362**
Provisions for doubtful customer receivables	(7,690)	(2,307)
Total	**64,769**	**55**

Amounts in thousand Euro, unless stated otherwise

3.31.3 Liquidity risk

Liquidity risk monitoring focuses on the management of cash inflows and outflows on a permanent basis, so that the Group has the ability to meet its cash liabilities and retain the cash reserves required for its operations. Liquidity is managed by maintaining cash and approved bank credit lines. At the date of preparation of the financial statements, unused approved bank credits were available to the Group, which are considered sufficient to handle any possible shortage of cash in the future.

Short-term bank liabilities are renewed at maturity, as they are part of the approved bank credit lines.

The following table presents the liabilities – disbursements according to their maturity dates.

Group 31.12.2023	Up to 1 month	1-6 months	6-12 months	1-5 Years	Over 5 years	Total
Suppliers	17,088	21,284	90	-	-	**38,462**
Other short-term liabilities	11,611	9,695	72	-	-	**21,378**
Short-term debt	4,881	16,776	4,898	-	-	**26,555**
Liabilities from Leases (short-term portion)	85	444	611	-	-	**1,140**
Long-term debt	-	-	-	26,713	1,077	**27, 790**
Liabilities from Leases (long-term portion)	-	-	-	1,885	-	**1,885**
Other long-term liabilities	-	-	-	518	-	**518**
Total 31.12.2023	**33,665**	**48,199**	**5,671**	**29,116**	**1,077**	**117,728**

Company 31.12.2023	Up to 1 month	1-6 months	6-12 months	1-5 Years	Over 5 years	Total
Suppliers	259	105	-	-	-	**364**
Other short-term liabilities	342	920	3	-	-	**1,265**
Short-term debt	-	-	-	-	-	**-**
Liabilities from Leases (short-term portion)	13	50	80	-	-	**143**
Long-term debt	-	-	-	-	-	**-**
Liabilities from Leases (long-term portion)	-	-	-	179	-	**179**
Other long-term liabilities	-	-	-	1	-	**1**
Total 31.12.2023	**614**	**1.075**	**83**	**180**	**-**	**1.952**

Amounts in thousand Euro, unless stated otherwise

Group 31.12.2022	Up to 1 month	1-6 months	6-12 months	1-5 Years	Over 5 years	Total
Suppliers	21,357	19,051	222	-	-	**40,630**
Other short-term liabilities	11,324	10,367	1,279	-	-	**22,970**
Short-term debt	3,658	8,735	14,596	-	-	**26,989**
Liabilities from Leases (short-term portion)	86	383	498	-	-	**967**
Long-term debt	-	-	-	30,993	648	**31,641**
Liabilities from Leases (long-term portion)	-	-	-	1,446	24	**1,470**
Other long-term liabilities	-	-	-	174	-	**174**
Total 31.12.2022	**36,425**	**38,536**	**16,595**	**32,613**	**672**	**124,841**

Company 31.12.2022	Up to 1 month	1-6 months	6-12 months	1-5 Years	Over 5 years	Total
Suppliers	248	47	-	-	-	**295**
Other short-term liabilities	495	721	116	-	-	**1,332**
Short-term debt	1,022	-	-	-	-	**1,022**
Liabilities from Leases (short-term portion)	12	61	74	-	-	**147**
Long-term debt	-	-	-	-	-	**-**
Liabilities from Leases (long-term portion)	-	-	-	76	-	76
Other long-term liabilities	-	-	-	1	-	1
Total 31.12.2022	**1,777**	**829**	**190**	**77**	**-**	**2,873**

3.31.4 Foreign exchange risk

The Group is exposed to foreign exchange risks arising from existing or expected cash flows in foreign currency and investments that have been made in countries outside Greece. The management uses hedge instruments, mainly foreign currency forward contracts, to hedge the risks arising from changes in foreign exchange rates. Sensitivity analysis of the effect of exchange rate changes is given in the table below.

Amounts in thousand Euro, unless stated otherwise

Foreign Currency	2023			2022		
Change of foreign currency against Euro *	USD	GBP	Other	USD	GBP	Other
Profit before tax						
+5%	(155)	(53)	-	(333)	65	(18)
-5%	172	58	-	368	(72)	21
Equity						
+5%	(58)	(438)	(319)	(56)	(881)	(302)
-5%	64	484	352	62	974	334

Note

- *Profits before Taxes are converted at the average exchange rates*
- *Equity is converted at the exchange rate at the closing date of each fiscal year.*

3.31.5 Interest rate Risk

The long-term loans of the Group have been granted by Greek and international banks and are mainly in Euro. Their repayment time varies, depending on the loan agreement and they are usually linked to Euribor plus spread. The Group's short-term loans have been granted by various banks, with Euribor interest rate plus spread as well as Libor interest rate plus spread.

The Group Management monitors the evolution of the interest rates level and initiate actions, to the extent possible, to retain or decrease the spreads. At the same time, effort is being placed on liquidity management, with a target to maintain a rational debt balance, compared with Group's sales volume, profitability level and its investment plans.

It is estimated that a change in the average annual interest rate by 1% will result in a (charge) / improvement of Earnings before Tax as follows:

Possible interest rate change	Effect on Earnings before Tax			
	Group		Company	
	2023	2022	2023	2022
Interest rate increase 1%	**(573)**	(610)	**-**	(1)
Interest rate decrease 1%	**573**	610	**-**	1

3.31.6 Capital Adequacy Risk

The Group controls capital adequacy using the Net Debt to Equity ratio and the Net Debt to EBITDA ratio. The Group's objective in relation to capital management is to ensure the ability for its smooth operation in the future, while providing rational returns to shareholders and benefits to other parties, as well as to maintain an adequate capital structure so as to ensure a low cost of capital. For this purpose, it systematically monitors working capital in order to maintain the normal level of external financing.

Amounts in thousand Euro, unless stated otherwise

Capital Adequacy Risk	Group		Company	
	2023	2022	2023	2022
Long-term debt	27,790	31,641	-	-
Long-term liabilities from leases	1,885	1,470	179	76
Short-term debt	26,555	26,989	-	1,022
Short-term liabilities from leases	1,140	967	143	147
Total debt	**57,370**	**61,067**	**322**	**1,245**
Minus cash & cash equivalents	27,801	39,610	242	1,427
Net debt * **	**29,569**	**21,457**	**80**	**(182)**
EBITDA*	**44,017**	**48,243**	**(263)**	**(338)**
NET DEBT / EBITDA**	**0.67**	**0.44**	**-**	**-**
EQUITY	**277,054**	**267,861**	**80,358**	**80,828**
NET DEBT / EQUITY	**0.11**	**0.08**	**0.00**	**0.00**

* *Concerns Total Operations*

** *Since 2018, the Company has transformed into a Holding Company and therefore the net debt to EBITDA ratio does not reflect the actual relation between the Company's debt and its earnings. For this reason, going forward the Company does not monitor the particular ratio.*

*** *The cash and cash equivalents, and therefore the net debt, do not include an amount of € 13,269 relating to time deposits, which have been concluded during the current financial year, with a duration of more than three months. The relevant amount has been transferred to the other receivables. Therefore with the addition of Group's time deposits, the Group's Net Debt accounts for € 16,300 (compared to € 21,457 in 2022). In view of the above, the Net Debt / EBITDA ratio settled at 0.37x (versus 0.44x in 2022), whereas the Net Debt / Equity ratio settled at 0.06x (versus 0.08x in 2022).*

Amounts in thousand Euro, unless stated otherwise

3.32 Significant Events

The important events that took place during the financial year 2023 are listed below.

Macroeconomic Environment, Performance and Prospects of the Group, Climate Issues and Expected Credit Losses

2023 was another year affected by a series of unfavorable macroeconomic and geopolitical factors. On the one hand, hostilities in the Middle East created and keep creating further uncertainty in the European as well as the global economy, combined with the ongoing war conflict between Russia and Ukraine. On the other hand, the weak performance of Europe's major economies created conditions of stagnation and uncertainty in the market. At the same time, the inflationary pressures continued to exist, however at clearly lower levels, while interest rates have remained at higher levels.

In contrast to the above backdrop, the energy costs moved to lower levels compared to the levels of 2022, while costs of raw and auxiliary materials moved also to lower levels in comparison with the previous year.

With regard to the Group's areas of activity, 2023 was a year of low demand in the Technical Fabrics sector mainly affected by the weak demand in the construction and agricultural sector, while a stronger demand was seen in the Packaging sector.

I. Group's performance during 2023

In particular, during the fourth quarter of 2023, the following were observed:

- Reduced demand for products in the construction sector.
- Steady demand for products related to the infrastructure sector and to the large-scale construction projects.
- Reduced demand for the products of the agricultural sector.
- Increased demand for products related to the packaging sector (food and paints).
- Almost zero demand for products related to COVID-19.
- Stabilization of the cost of raw materials at lower levels, compared to the previous year.
- Further pressures for decreases on sales prices, in all product categories as a result of reduced raw material prices and due to lower demand.
- Steady energy costs during the current year, reduced however compared to 2022.
- Steady transport costs with satisfactory availability of transportation means.
- Limited reduction in the cost of raw materials and packaging materials.
- Constantly increased interest rates.

From a financial perspective, Turnover amounted to €345.4 million in 2023, settling lower only due to the significant drop in average sale prices, versus the previous year Turnover of €394.4 million. It is noted that in the first months of 2022, the prices of raw materials had fluctuated at historically high levels and therefore sale prices also moved upward during the same year. The volumes sold in 2023 stayed almost the same with the ones in 2022 despite the lower demand in key sectors of the economy (construction, agricultural sector) primarily in the European Union, United Kingdom and USA.

For the year 2023, Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) amounted to €44.0 million. In the year 2022, Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) had reached €48.2 million, however following the deduction of the one-off profits from the COVID-19 products of approximately €5.3 million, in comparable terms, the Earnings before Interest, Taxes, Depreciation and Amortization (EBITDA) of year 2022 had settled at €42.9 million. As a result, on comparable basis, the operating profitability (EBITDA) posted an increase of 2.4% in 2023 versus 2022.

In view of the difficult conditions prevailing in the markets and economies in general, particularly the ones of the Central Europe and the United Kingdom, the improvement of Group's profitability performance in 2023 versus 2022 clearly demonstrates the ability of the Group to achieve stable and recurring profitability. At the same time, the retention of volumes sold is also a strong indication of the Group's potential to further enhance its financial performance in the future.

Regarding the liquidity levels of the Group and the trading cycle of subsidiaries, there was no negative effect due to the difficult conditions observed during the year under consideration. The Group's Net Debt amounted to €29.6 million, however it should be noted that the calculation of Net Debt does not include time deposits of €13.3 million. Therefore in the event that this amount had been included, the Group's net debt would have amounted to €16.3 million. The low level of Net Debt demonstrates the Group's strong financial position as well as the quality of its customer portfolio, its ability to make investments while keeping its Net Debt relatively low, and also its ability to distribute significantly higher dividends compared to pre-pandemic levels.

At the same time, the implementation of the Group's investment plan, amounting to €30 million on a cash basis, was implemented smoothly via investments made mainly in the Group's production facilities in Greece and abroad with regard to both business segments.

II. Prospects of the Group

In the first months of year 2024, both markets and economies have been characterized by trends and conditions which are relatively comparable to the ones of the year 2023. Inflation remains relatively stable, whereas prices of raw and auxiliary materials have followed an upward trend which is expected to continue at least for the first half of 2024. Finally, the recent shipping crisis in Red Sea is causing difficulties in maritime trade but also creates upward pressures in transport costs, while the new tension in the Middle East makes the geopolitical conditions even more difficult and increases the uncertainty about the economies.

For the first quarter of 2024, the Management estimates that Group's operating profitability (EBITDA), in absolute terms, will edge 5%-10% higher than in the first quarter of the previous year. This is due to specific actions taken on the Group level and specifically by the sales teams as well as the subsidiaries' management teams, but is also due to profits generated from new product categories and partnerships. Furthermore, there is stable demand in the sectors of infrastructure and packaging, an increase in demand in the agricultural sector, whereas there is still weak demand in the construction sector.

With regard to the Group's annual profitability, the Management estimates that, despite the high uncertainty about the course of the global economy and of Europe in particular, the Group's EBITDA profitability for the year 2024 is expected to fluctuate at higher levels than the ones of 2023. However, even if the Company does not revise its initial annual target, the recent crisis in the Middle East creates new conditions of uncertainty, the effects of which are impossible to determine at the given time, therefore any estimate of annual profitability is highly uncertain, while the Management of the Group monitors the market developments so to be able to implement the necessary actions, in order not to deviate from its plan.

of any other events that would create additional distress or abnormality in the market.

III. Climate issues

The Group recognizes the risks and impacts that may arise in its business activity due to the climate crisis and the energy transition, which may affect its production process and activities, while at the same time has identified great opportunities that are emerging through the adoption of the principles of circular economy, the use of recycled raw material and the investment in renewable energy sources.

In order to mitigate the risks arising from climate change, but also to take advantage of the opportunities that arise in order to achieve positive financial results for itself and the environment in which it operates, the Group is constantly adjusting its business model, in order to constantly reduce its environmental footprint. It achieves this through (a) recording direct and indirect greenhouse gas emissions along with the constant improvement of the respective indicators, (b) reducing energy consumption in production processes, (c) self-production and use of energy from renewable sources (solar, geothermal and hydroelectric), (d) reducing the use of natural resources through the use of recycled raw material and (e) proper waste management.

In addition, the Group focuses on the development of innovative and sustainable products and services, applying the principles of the circular economy. With the aim of further strengthening the achievement of this goal, the Group has created the circular economy platform IN THE LOOP, which networks companies, brands, public entities and consumers, facilitates the continuous reduction of environmental footprint throughout the value chain, and also designs specialized closed / controlled cycle systems of upgraded recycling purposes.

Therefore, the Company has established and communicated relevant principles and policies, while it has formulated a strategic plan of specific actions, which are being implemented with measurable positive results thus ensuring the Group's business continuity. At the same time, through a specialized team, appropriate actions are already being taken in order to implement the requirements of the new CSRD (Corporate Sustainability Reporting Directive). The Group's excellent performance is also reflected in the respective evaluations performed from recognized international organizations. The Group has ranked in the highest "Platinum" scale in "Forbes ESG Transparency Index", which reflects the level of transparency and has been also awarded the "B" rating from the international organization CDP (Carbon

Disclosure Project), exceeding the global average for the manner by which it manages the impact of its activities on climate change.

Further details are set out in the Non-Financial Information Report (Section 12) of the Annual Financial Report.

IV. Expected Credit Losses

There are no expected credit losses as a result of the current conditions and circumstances. In any case, according to the established policy, a big part of the companies' sales insured, while additional measures have been taken to ensure the Group carries out transactions with reliable customers (credit risk assessment, credit scoring, advances, etc.). More information on credit risk can be found in note 3.31.2 of financial statements.

Impact from Geopolitical Conditions

The new middle east crisis has created geopolitical instability anew and a broader uncertainty about the potential macroeconomic consequences that will likely emerge, especially in the event of a long-lasting conflict. It is noted that the Group does not directly carry out any significant business activities in the involved parties, i.e. in the areas directly affected by the conflict. At the same time, the recent conflicts of Israil and Iran create additional instability and uncertainty in the wider region and globally. More specifically, the overall exposure to the markets of Israel, Iran and Palestine is limited, as based on the volume data of 2023, sales in above countries amounted to 0.26% of the Group's total turnover.

The war outbreak after the Russian military invasion of Ukraine continues and creates geopolitical instability with adverse macroeconomic consequences which the company faces on a day-to-day basis and are mainly related to increase in a series of raw materials and products. The above conditions create an environment of great uncertainty affecting the level of demand especially in Europe. The Group does not have significant direct business activities in Ukraine and in Russia, i.e. in the areas directly affected by the war. Furthermore, the overall exposure to Ukraine and Russia is minimal. Based on the financial results of 2022, sales in these two countries stood at 0.55% of the Group's total turnover (for 2022, corresponding sales had stood at 0.2% of total Group sales).

Therefore, given the non-existence of any significant business activity in the specific regions when it comes to customer sales, the Group does not expect to have any immediate and significant impact on its financial performance. However, the negative and long-lasting evolution of the conflicts along with the wider and unfavorable macro-economic repercussions might potentially have a negative effect on the activities of all businesses and companies activating in Europe and therefore on the business activities of the Group. The Group's Management closely monitors the relevant developments and if needed will undertake a series of actions to weather any negative consequences, should they arise.

Interim Dividend fiscal year 2022

The interim dividend for fiscal year 2022 was paid in fiscal year 2023. More analytically, the Board of Directors of the Company, during its meeting of November 22nd, 2022 approved the distribution (payment) of interim dividend for fiscal year 2022 to the shareholders of the Company, of a total amount of 3,000,000.00 Euros (gross amount), corresponding to 0.0685848289 Euros per share (gross amount), which with the increase corresponding to the 751,396 treasury shares, which were held by the Company and in accordance with the law are excluded from the interim dividend distribution, amounted to 0.0697835797 Euros per share.

The above amount of the interim dividend is subject to 5% withholding tax, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force after its amendment by Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

Therefore, the final payable amount of the interim dividend for the fiscal year 2022 was 0.0662944007 Euro per share.

The cut-off (ex-dividend) date of the interim dividend, as it had been already announced, was Monday, January 30, 2023.

Beneficiaries of the interim dividend for fiscal year 2022 were the shareholders registered in the Company's records in the Dematerialized Securities System on Tuesday, January 31, 2023 (Record Date).

The payment (distribution) of the interim dividend commenced on Friday, February 3, 2023, and was paid through the paying Bank "PIRAEUS BANK S.A.", according to the procedure that had been described in the relevant Company's announcement dated December 8th, 2022.

Announcement of Regulated Information in accordance with Law 3556/2007

The Company following the relevant notification, Company received from below shareholders from March 10th, 2023, announced the following amendments / developments on March 9, 2023:

1. Mr. Konstantinos Chalioris, shareholder and Chairman of the Board of Directors of the Company, transferred from his individual Investment Account, to two "Joint Investor Shares" (KEM), the first one jointly created with his son Alexandros Chalioris and the second one jointly created with his son Stavros Chalioris (himself being the first beneficiary in both "Joint Investor Shares"), a total of 18,000,983 common registered shares with voting rights, i.e. a percentage of 41.153% of a total of 43,741,452 common registered shares with voting rights of the Company.

   However, following the above, there was absolutely no change in the number and percentage of shares and voting rights controlled by Mr. Konstantinos Chalioris, who holds a total of 18,936,558 common registered shares with voting rights of the Company (and the same number of voting rights) a percentage of 43.292%. More specifically, he holds 18,000,983 common registered shares through the aforementioned "Joint Investor Share" and 935,575 common registered shares with voting rights (percentage 2.139%) through his Personal Investment Account.

2. Mr. Stavros Chalioris, son of Konstantinos,

due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,491 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage 0.484%) in his Personal Investment Account and,

3. Mr. Alexandros Chalioris, son of Konstantinos, due to his participation in the aforementioned "Joint Investor Share" (which he holds jointly with Konstantinos Chalioris) holds 9,000,492 common registered shares of the Company (percentage 20.577%), while he already holds 212,071 common registered shares with voting rights (percentage of 0.484%) in his Personal Investment Account.

Replacement of a resigning member of the Audit Committee – Formation of the Audit Committee into a Body

The Company announced that as a result of the resignation of the member of the Company's Audit Committee, Mr. Konstantinos Gianniris (third person - Non-Member of the Board of Directors), which is effective from 28.4.2023, the Board of Directors of the Company, by its Decision on. 2/5/2023, appointed Mrs. Sofia Manesi (third person - Non-Member of the Board of Directors) as a temporary replacement of the above resigned member in the Audit Committee of the Company until 24 May 2023, when the Annual General Meeting of the Company's shareholders was convened.

The Board of Directors, following a relevant recommendation of the Remuneration and Nominations Committee, found in the person of Mrs. Sofia Manesi sufficient knowledge of the Company's subject matter, a guarantee of ethics and reputation, reliability and solvency, and that she has sufficient time to perform her duties as a member of the Audit Committee as well as experience and knowledge in auditing and accounting matters. The Board of Directors appointed Mrs. Sofia Manesi to replace the resigned member after having considered the Audit Committee's Rules of Procedure and after finding that she fulfils the requirements of independence of Article 9 of Law 4706/2020 and therefore has no dependency relationship with the Company or with persons connected to it, nor is she in any potential or actual situation that leads to a conflict of interest with the Company.

The Audit Committee decided on 2 May 2023 to elect Mr. Georgios Samothrakis, Independent Non-Executive Member of the Board of Directors of the Company, as Chairman of the Audit Committee, in accordance with the provisions of article 44 par. 1 case e) of Law 4449/2017, as in force.

Following the above, the Audit Committee of the Company is constituted as follows:

- Georgios Samothrakis, Independent Non-Executive Member of the Board of Directors of the Company, as Chairman of the Audit Committee
- Konstantinos Kotsilinis, Non-Member of the Board of Directors, - third person, member of the Audit Committee
- Sofia Manesi, Non-Member of the Board of Directors, - third person, member of the Audit Committee, temporary Member of the Audit Committee until the Annual General Meeting of the Company's shareholders to be held on 24.5.2023, in accordance with article 44 par. 1 case f) of Law 4449/2017.

Finally, it was noted that all members of the Audit Committee meet the requirements and independence criteria under the current regulatory framework (article 44 par. 1 of Law 4449/2017 as in force and article 9 par. 1 and 2 of Law 4706/2020).

Annual Ordinary General Meeting of the Company's Shareholders

The Annual Ordinary General Meeting of the Company's shareholders, which took place on May 24, 2023 remotely in real time via videoconference, approved the following among others:

A) the shareholders approved unanimously the allocation (distribution) of the earnings for the fiscal year 2022 (01.01.2022-31.12.2022), and specifically they approved the distribution (payment) of total dividend amounting to 11.300.000,00 Euro (gross amount) to the shareholders of the Company from the profits of the fiscal year ended December 31, 2022, but also from profits of previous years.

Given that the Company, pursuant to the relevant decision of its Board of Directors dated 22.11.2022, has already made the allocation (distribution) to the shareholders of an interim dividend for the fiscal year 2022 of a total amount of 3,000,000.00 Euros (gross amount), i.e. 0.0697835797 Euros per share (gross amount increased by the amount corresponding to the treasury shares that the Company held at the cut-off date of interim dividend), the Annual Ordinary General Meeting of shareholders approved unanimously the distribution of the remaining amount of the dividend, and in particular of the amount of 8,300,000.00 Euros (gross amount), i.e. 0.1897513599 Euros per share (gross amount), which amount will be increased by the amount corresponding to the treasury shares that the Company will hold at the dividend cut-off date and which (treasury shares) are excluded from the distribution, according to the provisions of article 50 of Law 4548/2018, as in force.

The above final (gross) amount of the dividend is subject to 5% tax withholding, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force.

B) the shareholders voted by majority positively the Remuneration Report of the fiscal year 2022, which was prepared in accordance with the provisions of article 112 of L. 4548/2018, containing a comprehensive overview of the total remuneration of the members of the Board of Directors (executive and non-executive), and explaining how the Remuneration Policy of the Company was implemented for the immediately preceding fiscal year.

C) the shareholders approved by majority the amendment of the article 15 of the Company's Articles of Association referring to the compensation (remuneration) of the members of the Board of Directors.

D) the shareholders approved by majority the final decision on the appointment of a new member of the Company's Audit Committee, in accordance with the provisions of article 44, par. 1 of Law 4449/2017, as applicable, Mrs. Sofia Manesi, who is also a third person and non-member of the Board of Directors, in replacement of a resigned member-third person who is not a member of the Board of Directors Mr. Konstantinos

Gianniris. The new member fulfil all the conditions of independence of Law 4706/2020, as in force and the conditions of article 44 of Law 4449/2017, as in force.

The decisions of the General Meeting of Shareholders are posted on the Company's website at the link https://www.thracegroup.com/gr/en/general-meetings/

Announcement of ex- dividend date / Payment of remaining dividend for the Year 2022

The company announced, pursuant to the article 4.1.3.4 of the Athens Exchange Rulebook, that the Annual Ordinary General Meeting of Shareholders, that took place on May 24th 2023, approved unanimously the distribution (payment) of dividend to Company's Shareholders, from the profits of the fiscal year 2022 (01.01.2022-31.12.2022) and from prior years' profits, and in particular, approved the payment of the total amount of 11.300.000 Euro (gross amount), i.e. 0.2583361887 Euros per share (gross amount).

It is noted that the Company has already made the allocation (distribution) to the shareholders of an interim dividend for the fiscal year 2022, on February 3th, 2023, of a total amount of 3,000,000 Euros (gross amount), i.e. 0.0685848289 Euros per share (gross amount), which with the corresponding increase of the 751,396 treasury shares, which were held by the Company and were excluded by law from the interim dividend distribution, amounted to 0.0697835797 Euros per share (gross amount).

After that, the remaining amount of the dividend was 8,300,000 Euros (gross amount), from the profits of the fiscal year 2022 (01.01.2022-31.12.2022), i.e. 0.1897513599 Euros per share (gross amount), which after the increase corresponding to 751,396 treasury (own) shares, which were held by the Company and were excluded from the dividend payment, amounted to 0.1930679039 Euro per share (gross amount).

The above amount of the dividend was subject to 5% tax withholding, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force after its amendment of par. 24 of Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

Therefore, the final payable amount of dividend settled at 0.1834145087 Euro per share (net amount). The cut-off (ex-dividend) date of the dividend was set for Wednesday, 31st May 2023.

Beneficiaries of the remaining dividend for fiscal year 2022 are shareholders registered in the Company's records in the Dematerialized Securities System on Thursday, 1st June 2023 (Record Date).

The distribution (payment) of the above remaining dividend commenced on Wednesday, 7th June 2023 and was paid through the paying Bank "PIRAEUS BANK S.A.".

Re-constitution of the Audit Committee into Body - Appointment of New Member

The Company notified the investor community, in accordance with the provisions of article 17 paragraph 1 of Regulation (EU) under no. 596/2014 of the European Parliament and of the Council of April 16, 2014, that the Annual Ordinary General Meeting of the Company's Shareholders of May 24, 2023 approved by majority in accordance with the provisions of article 44 of Law 4449/2017, as applicable after the amendment by the article 74 of Law 4706/2020, the election-appointment of a new member of the Audit Committee (a third person, not a member of the Board of Directors) namely Ms. Sofia Manesi superseding a resigned member (a third person also not member of the Board of Directors) and namely Mr. Konstantinos Gianniris.

It should be noted that the Audit Committee under its new composition:

(a) constitutes an Independent Joint Committee;

(b) consists of three (3) members in total and in particular of one (1) Independent Non-Executive Member of the Board of Directors and two (2) third persons - Non-Members of the Board, independent of the Company. All persons fulfil the independence criteria of article 9, paragraph 1 and 2 of Law 4706/2020, as applicable, and

(c) the term of the Committee coincides with the term of the Board of Directors, i.e. it will be five years, ending on February 11, 2026, extending until the end of the period within which the next Ordinary General Meeting of Shareholders must be convened and until the relevant decision is taken. In no case, however, may the term of Committee exceed six years.

In particular, following its aforementioned decision, the composition of the Company's Audit Committee is as follows:

1. Georgios Samothrakis of Panagiotis, independent non-executive member of the Board of Directors,
2. Konstantinos Kotsilinis of Eleftherios, third person - non-member of the Board of Directors.
3. Sofia Manesi of Nikolaos, third person – non-member of the Board of Directors,

While at the same time the following were established and reconfirmed for each of the above members of the Committee:

(a) the fulfilment of the individual and collective suitability criteria, in accordance with the provisions of article 3 of Law 4706/2020 and the Circular under number 60/18.09.2020 of the Hellenic Capital Market Commission, as well as the provisions of the applicable and approved Suitability Policy of company,

(b) the fulfilment -by all members of the Audit Committee, of the conditions of independence in accordance with the provisions of article 9, paragraph 1 and 2 of Law 4706/2020, as applicable, namely that:

(i) the above members did not hold directly or indirectly a percentage of voting rights greater than 0.5% of the Company's share capital, and

(ii) the above members were not associated with any financial, business, family or other dependent relationships, which may influence their decisions as well as their independent and objective judgment;

(c) the non-existence of obstacles and conditions that are being described in provisions of article 3, paragraph 4 of Law 4706/2020, as applicable, i.e. the non-issuance within one (1) year, before or after the election of the member respectively, of a final court decision that acknowledges the member's guiltiness for loss-making transactions with related parties on behalf of a company or a non-listed company as provided by Law 4548/2018,

(d) the absence of obstacles/incompatibilities posed by the provisions of the current legislative framework on corporate governance, including the Greek Corporate Governance Code applied by the Company, the Operating Regulations and the Company's Suitability Policy.

(e) the sufficient knowledge of the sector in which the Company operates, and finally

(f) the persons of the entire Audit Committee possessed sufficient knowledge and experience in auditing and accounting (including knowledge and complete understanding of International Auditing Standards), conditions that were imposed by the provision of article 44, paragraph 1, section g' of Law 4449/2017.

The Members of the Company's Audit Committee during the meeting of May 25, 2023 unanimously elected Mr. Georgios Samothrakis of Panagiotis as Chairman of the Committee, since it was previously established but also verified that the above person:

(a) is independent from the audited entity within the meaning of article 9, paragraph 1 and 2 of Law 4706/2020, as applicable,

(b) is the most suitable for the position of Chairman based on professional training, knowledge and experience.

Following the above, the Audit Committee under its new final composition was reconstituted into a body as follows:

1. Georgios Samothrakis of Panagiotis, independent non-executive member of the Board of Directors, Chairman of the Committee.
2. Konstantinos Kotsilinis of Eleftherios, third person - non-member of the Board of Directors. Member of the Committee.
3. Sofia Manesis of Nikolaos, third person – non-member of the Board of Directors, Member of the Committee.

Commencement of Share Buyback Program

The Company announced in compliance with the Regulation No. 596/2014/EU and the Athens Exchange Rulebook, that the Board of Directors approved the commencement of the implementation of the Company's Shares Buy-back Program, as approved by the Annual General Meeting of the Shareholders dated May 24th, 2023.

It was noted that the approved Shares Buy-back program includes the purchase of Company's shares through the Athens Exchange (ATHEX), in accordance with the provisions of articles 49 & 50 of L.4548/2018, until May 24th,2025, at a maximum number of 4,341,876 common registered shares (including and aggregating the treasury shares already purchased by the Company within the context of the previous Share Buy-back programs), with a purchase price range between fifty cents of Euro (0.50€) (minimum) per share and ten Euro (10 €) (maximum) per share.

Share purchases are carried out in accordance with the current regulatory framework.

Announcement of the Decision to Distribute an Interim Dividend the 2023

The Company informed the investor community, that the Board of Directors of the Company, during its meeting on 25th September 2023, approved the distribution (payment) to the Company's shareholders of an interim dividend from the earnings of the current financial year 2023 amounting in total to 3,000,000 Euros (gross amount), i.e. 0.0685848289 Euro per share of the Company (gross amount).

The final amount per share of the interim dividend which was paid, was increased by the amount corresponding to the treasury shares held by the Company on the cut-off date of the interim dividend.

The above amount of interim dividend is subject to a withholding tax of 5% in accordance with the provisions of article 40 paragraph 1 and of article 64 paragraph 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013) as applicable after its amendment by Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

The distribution of the interim dividend takes place two (2) months after the registration in G.E.MI. of the relevant announcement regarding the release of the interim financial statements for the period 01.01.2023-30.06.2023 (First half of the current financial year 2023).

Announcement of ex- dividend date / Payment date of interim dividend for the Year 2023

The Company announced to the investor community, pursuant to the article 4.1.3.4 of the Athens Exchange Rulebook, (called as "Regulation" hereafter), as in force, that the Board of Directors of the Company, during its meeting of September 25th, 2023, approved the distribution (payment) of interim dividend for year 2023 to the shareholders of the Company, of a total amount of 3,000,000.00 Euros (gross amount), corresponding to 0.0685848289 Euros per share (gross amount), as already informed the investors' community at September 28th, 2023, with a relevant corporate announcement. (Note 3.25)

The Board of Directors of the Company, during its meeting of October 6th, 2023 set the following dates:

Thursday, November 30th, 2023 was set as the interim dividend cut-off (ex-dividend) date.

Beneficiaries of the interim dividend for fiscal year 2023 are the shareholders registered in the Company's records in the Dematerialized Securities System on Friday, December 1st, 2023 (Record Date).

The payment (distribution) of the interim dividend will commence on Wednesday, December 6th, 2023, and will be paid through the paying Bank "PIRAEUS BANK S.A." as follows:

1. Through the participants in the Dematerialized Securities System (DSS) i.e. Banks and Brokerage/Securities Companies, according to the provisions of the DSS Operation Regulation of the Hellenic Central Securities Depository (ATHEXCSD) and the relevant decisions of ATHEXCSD.
2. Especially in cases of payment of the interim dividend to the legal heirs of deceased entitled shareholders,

whose securities are kept in the Special Account of their S.A.T. ID in the DSS under ATHEXCSD custody, the disbursement process will be facilitated, following completion of the inheritance procedural steps, through any branch of "PIRAEUS BANK" network.

It was also clarified that according to the current applicable legislation, the right for the collection of the interim dividend amount expires after the completion of a five year period (article 250 of the Civil Code, section 15) from the end of the fiscal year in which this right was created and following such time period the uncollected amounts will irrevocably be reimbursed to the Hellenic State, in accordance with article 1 of legislative decree 1195/1942.

Write-off of Dividend for the Financial Year 2017

The Société Anonyme under the name "THRACE PLASTICS HOLDING COMPANY COMMERCIAL SOCIETE ANONYME" with the distinctive title "THRACE PLASTICS CO S.A." (called as "Company" hereafter), hereby announced to the investor community, that the five-year period for the collection of the dividend for the financial year 2017, expired on December 31st, 2023. Following that date, dividends not collected from entitled parties will be written off, in favor of the Greek State in accordance with the applicable legislation.

Thrace Group's New Investment Plan of a total amount of € 10 million in Packaging Business in Greece

The Company announced the immediate implementation of a new extended unplanned investment program of €10 million, for the Packaging Business Unit, which will take place in Greece, through its subsidiary Thrace Plastics Pack SA.

The new investment program is oriented towards the Sustainable Development, focusing on the further increase of the production capacity in the specific subsidiary of the Group, as well as in the Packaging Business Unit in general, targeting to support the Greek clientele in a more efficient, direct and complete manner, with an even more complete product portfolio, as well as to further develop the Group's export activities and subsequently enhance its business extroversion.

The specific categories of the new investment plan with immediate implementation by the specific subsidiary, are summarized as follows:

- Investment in Injection Molding Production Machines for the production of plastic containers, which is the main technology for production of plastic containers, targeting the food sector, the hotels / restaurants industries and the paints industry,
- Investment in Thermoforming technology, for the production of small plastic containers, targeting the food sector and in specific the dairy market,
- Investment in Paper Packaging Production Machinery, supplementary to the existing product portfolio for the catering sector.

The new investment plan, which will reach an amount of €10 million approximately, is in accordance with the sustainable development practices and will contribute to an environmental footprint reduction, while the new machines are expected to be fully operational within the first half of 2024. Based on this time plan, it is estimated that the new investments will increase the production capacity of the subsidiary by 4,000 tons approximately, on an annual basis. The new investment plan will be financed both with own funds and external financing.

Announcement of the exact payable amount of the interim dividend for the fiscal year 2023

THRACE PLASTICS CO S.A. with reference to its earlier announcement dated October 10th, 2023, announced to the investor community, pursuant to the article 4.1.3.4 of the Athens Exchange Rulebook, that the Board of Directors of the Company, during its meeting of September 25th, 2023 approved the distribution (payment) of interim dividend for fiscal year 2023 to the shareholders of the Company, of a total amount of 3,000,000.00 Euros (gross amount), corresponding to 0.0685848289 Euros per share (gross amount), which with the increase corresponding to the 798,549 treasury shares, which were held by the Company and in accordance with the law are excluded from the interim dividend distribution, would amount to 0.0698602048 Euros per share.

The above amount of the interim dividend is subject to 5% withholding tax, in accordance with articles 40 par. 1 and 64 par. 1 of Law 4172/2013 (Government Gazette A΄ 167/23.07.2013), as in force after its amendment by Law 4646/2019 (Government Gazette A΄ 201/12.12.2019).

Therefore, the final payable amount of the interim dividend for the fiscal year 2023 was 0.0663671946 Euro per share.

Issuance of Tax Certificates for the Fiscal Year 2022

The Company under the corporate name 'THRACE PLASTICS HOLDING AND COMMERCIAL ANONYMOUS COMPANY' and the distinctive title 'THRACE PLASTICS CO. S.A.' (hereinafter referred to as the "Company") in compliance with the provisions of paragraph 4.1.3.1 section 12 of the Athens Exchange Rulebook and article 17 of Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014, announces to the investors that following the completion of the tax audits for the financial year 2022 (fiscal year 2022), which were carried out by the Chartered Auditor-Accountants of the Group, in accordance with the provisions of article 65A law 4174/2013, both for the Company and its subsidiaries 'Thrace Nonwovens & Geosynthetics S.A.', 'Thrace Polyfilms S.A.', 'Thrace Plastics Pack S.A.', 'Thrace Eurobent S.A.' and 'Thrace Greenhouses S.A.', the relevant tax certificates were issued with an "unqualified opinion".

3.33 Significant events after the Reporting Period

The following paragraphs present the significant event that took place after the end of the financial year 2023 and up to the date of issuance of this Report:

Proposed Dividend for the Year 2023

The Board of Directors of the Company, with its meeting of April 22nd, 2024, unanimously decided to propose to the Annual Ordinary General Meeting of shareholders the approval of the distribution (payment) of the profits of the fiscal year that ended on 31.12.2023 and in particular to propose the distribution (payment) to the shareholders of a dividend of a total amount of 10,250,000.00 Euros (gross amount), i.e. 0.2343314986 Euros per share (gross amount) from the profits of the fiscal year 2023 (01.01.2023-31.12.2023), but also from profits of previous years.

Given that the Company, pursuant to the relevant decision of the Board of Directors dated September 25th, 2023, has already distributed to the shareholders the interim dividend for the fiscal year 2023 of a total amount of 3,000,000.00 Euros (gross amount), i.e. 0.0685848289 Euros per share (gross amount), the Board of Directors will subsequently propose to the Annual Ordinary General Meeting of shareholders the distribution of the remaining amount of the dividend, and in particular the amount of 7,250,000.00 Euros (gross amount), i.e. 0.1657466698 Euros per share (gross amount), which gross amount per share will be increased by the amount corresponding to the treasury shares that the Company will hold on the dividend cut-off date (and which treasury shares are not entitled to the payment of the dividend, by the provisions of article 50 of Law 4548/2018, as applicable.)

The Annual Ordinary General Meeting of shareholders will take the final decision concerning the approval of the above proposal.

There are no other events after the reporting period that have a significant impact on the financial statements of the Group.

The Financial Statements have been prepared in accordance with International Financial Reporting Standards as adopted by the European Union, were approved by the Board of Directors on 22 April 2024 and are signed by the representatives of such.

The Chairman of the BoD	The Chief Executive Officer	The Chief Financial Officer	The Chief Accountant
KONSTANTINOS ST. CHALIORIS	DIMITRIOS P. MALAMOS	DIMITRIOS V. FRAGKOU	FOTINI K. KYRLIDOU
ID NO. AM 919476	ID NO. AO 000311	ID NO. AH 027548	ID NO. AK 104541 Accountant Lic. Reg. No. 34806 A' CLASS

V. ONLINE AVAILABILITY OF THE FINANCIAL REPORT

The Annual Financial Statements of the Company, the Audit Report of the Chartered Auditor-Accountant and the Management Report of the Board of Directors, as well as the Annual Financial Statements, the reports of the Chartered Auditor-Accountant and the Reports of the Board of Directors of the companies that are incorporated in the consolidated financial statements of "THRACE PLASTICS CO SA" are registered on the internet at *www.thracegroup.gr* .

www.thracegroup.gr

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THRACE GROUP